

1 Kathryn A. Stebner, State Bar No. 121088
2 Brian S. Umpierre, State Bar No. 236399
3 STEBNER GERTLER & GUADAGNI
4 A Professional Law Corporation
5 870 Market St., Ste. 1285
6 San Francisco, CA 94102
7 Tel: (415) 362-9800
8 Fax: (415) 362-9801
9 Email: kathryn@sggklaw.com
10 brian@sggklaw.com

11 Guy B. Wallace, State Bar No. 176151
12 SCHNEIDER WALLACE
13 COTTRELL KONECKY LLP
14 2000 Powell Street, Suite 1400
15 Emeryville, CA 94608
16 Tel: (415) 421-7100
17 Fax: (415) 421-7105
18 Email: gwallace@schneiderwallace.com

19 Christopher J. Healey, State Bar No. 105798
20 DENTONS US LLP
21 4655 Executive Drive, Suite 700
22 San Diego, CA 92121-3128
23 Tel: (619) 236-1414
24 Fax: (619) 645-5328
25 Email: christopher.healey@dentons.com

26 Attorneys for Plaintiffs and the Class

27 UNITED STATES DISTRICT COURT
28 CENTRAL DISTRICT OF CALIFORNIA

1 Audrey Heredia as successor-in-interest
2 to the Estate of Carlos Heredia; Amy
3 Fearn as successor-in-interest to the
4 Estate of Edith Zack; and Elise Ganz,
5 as successor-in-interest to the Estate of
6 Helen Ganz; on their own behalves and
7 on behalf of others similarly situated,

8 Plaintiffs,

9 vs.

10 Sunrise Senior Living, LLC; Sunrise
11 Senior Living Management, Inc.; and
12 Does 2 - 100,

13 Defendants.

CASE NO. 8:18-cv-1974-JLS (JDEx)

**DECLARATION OF
CHRISTOPHER J. HEALEY IN
SUPPORT OF PLAINTIFFS'
REPLY BRIEF IN SUPPORT OF
MOTION FOR FINAL
SETTLEMENT APPROVAL AND
MOTION FOR ATTORNEYS'
FEES, COSTS AND SERVICE
AWARDS**

Date: November 8, 2024
Time: 10:30 a.m.
Place: Ctrm. 8A, 8th Fl.
Judge: Hon. Josephine L. Staton

1 I, Christopher J. Healey, hereby declare,

2 1. I am an attorney duly licensed to practice before all the courts of the
3 State of California and am a member in good standing of the State Bar of
4 California. I am a partner in the law firm of Dentons US LLP (“Dentons”) and am
5 one of the Class Counsel in the above captioned matter (the “Action”). I am
6 submitting this Declaration in support of Plaintiffs’ Reply Brief in Support of
7 Motion for Final Approval of Class Settlement and Plaintiffs’ Motion for
8 Attorneys’ Fees, Costs and Service Awards. Unless otherwise indicated, I have
9 personal knowledge of the facts set forth herein. If called upon to testify, I could
10 and would do so competently.

11 2. In the course of addressing questions raised by Objector Gold,
12 Plaintiffs revised the Lodestar Summary to show the Schneider Wallace entries in
13 chronologic order. That revision resulted in a decrease of roughly \$1,070 in the
14 Schneider Wallace lodestar. With that adjustment, the total lodestar for Class
15 Counsel on the Sunrise case through September 24, 2024 is \$15,068,169. In
16 addition, Plaintiffs prepared a separate spreadsheet to provide line item support the
17 Cost categories listed in the Lodestar Summary, which I refer to herein as the
18 detailed Cost Summary. The costs and expenses advanced by Class Counsel on the
19 Sunrise case through September 24, 2024 total \$1,709,196.54. As explained below,
20 Class Counsel have applied a courtesy reduction for certain cost items totaling
21 \$9,568.68, which reduces Plaintiffs’ costs reimbursement request to \$1,699,627.86.
22 The Updated Lodestar Summary and the Cost Summary are attached respectively as
23 **Exhibit 1** and **Exhibit 2** to this Declaration.

24 3. In preparing the Cost Summary, Class Counsel identified certain cost
25 items (principally meal and hotel charges) that have been written off (or written
26 down) as courtesy discounts. A list of the courtesy discounted Cost items is
27 attached as **Exhibit 3** to this Declaration.

28 4. The Settlement Administrator (CPT) reports that, as of November 1,

1 2024, it has received 19 opt-out requests, seven of which have been confirmed as
2 valid, with the balance under review by CPT. As of that date, CPT has received no
3 objections to the Settlement. (Class Counsel are aware of two objections, detailed
4 below). As of November 1, 2024, CPT reports that there are 4,183 persons in the
5 Settlement Class.

6 5. As of November 1, 2024, Class Counsel are aware of two objections
7 submitted to the Settlement. The first objector (David Levy) supports the
8 settlement but objects to Class Counsel's anticipated fee request (as disclosed in the
9 Settlement Class Notice). Dkt. 633. The second objector (Lisa Gold) supports the
10 monetary term (\$18.2 million), but raises two questions about the settlement terms
11 and opposes Class Counsel's request for fees and litigation costs.

12 6. At present, the Gold Objection does not appear on the Court's docket.
13 Class Counsel spoke by phone with Ms. Gold on October 24, 2024. Thereafter, on
14 October 26, 2024, Ms. Gold provided a courtesy copy of the objection she stated
15 had been timely mailed to the Court. Since October 24, 2024, Class Counsel have
16 exchanged multiple email with Ms. Gold concerning the Settlement.

17 7. With her objection, Ms. Gold questions the validity of Plaintiffs'
18 estimated average Move-In Fee of \$1,518. That number is based on Sunrise's
19 estimate of the aggregate Move-In Fees paid, divided by the number of Settlement
20 Class Members. Further, in deposition testimony, Sunrise witnesses testified that
21 not all residents paid a Move-In Fee. That testimony was corroborated by
22 interviews with Class Members and their families.

23 8. The total lodestar of Class Counsel in this case through September
24 2024 alone exceeds \$15 million. (As shown in the Updated Lodestar Summary, the
25 total lodestar fees through September 24, 2024 are \$15,068,169. Class Counsel
26 have incurred additional fees since that date.) In the next "closest" comparable case
27 (Aegis), the lodestar was roughly \$10.8 million. Dkt.631-10, p.31. In Oakmont, the
28 lodestar was roughly \$2.9 million. Dkt. 631-10, pp.39-41. None of the other cases

1 were litigated through class certification and Daubert motions, let alone appellate
2 proceedings on those motions. And unlike Sunrise, all of the other cases settled
3 well before trial.

4 9. Ms. Gold contends the Lodestar Summary contains different lodestar
5 entries for attorney conferences. As yet, Ms. Gold has not provided specific
6 examples to support that assertion. In any event, the fact that various counsel billed
7 different amounts of time for conferences does not necessarily make the billing
8 entry improper. On telephone conferences, some of the participants may have
9 joined (or left) the call at different times, as necessary to deal with other matters.
10 The same is true for an in-person meeting.

11 10. The one specific example that Mr. Gold references is the December
12 2023 counsel meeting to prepare for the January 2024 mediation and trial. Based
13 on prior scheduling orders, Class Counsel assumed that trial would be set for mid-
14 2024, if no settlement was reached. The class trial would have involved a
15 significant number of witnesses and required presentation of complex and
16 voluminous evidence, such as the MedModel staffing analysis.

17 11. The meeting was held in Texas to facilitate participation by David
18 Marks and his trial prep team, who are based in Houston. Specifically, the meeting
19 was held at a facility outside Austin, Texas. Due to Mr. Marks' relationship with
20 the facility, no lodging charges were incurred.

21 12. The meeting occurred over a four-day period (December 4-8, 2023),
22 with various team members attending for different durations. Mr. Marks and
23 members of his team -- attorneys Jacques Balette, Brent Moss, and Jim Thornton,
24 Harry Fleming (investigator) and Sterling Meachen (graphics expert) -- set up the
25 meeting presentations and spent the first day preparing video interviews of key
26 witnesses, preparing potential trial exhibits, identifying critical language in jury
27 instructions/jury questions, and other materials for group discussion. Three other
28 Class Counsel (myself, Michael Thamer and Megan Yarnall) arrived on December

1 5, participated in two full meeting days and left on December 8.

2 13. Over the course of the meeting, team members worked on delegated
3 tasks in addition to participation in joint sessions. For example, Mr. Marks' trial
4 team worked on the witness video interviews with Megan Yarnall, as her firm
5 headed up the initial efforts to identify potential witnesses. Also, as expected, some
6 team members excused themselves at various times to attend to other work
7 obligations.

8 14. The December 2023 meeting was necessary to prepare for the January
9 2024 mediation, which given prior unsuccessful mediation efforts represented the
10 last realistic opportunity to reach a settlement before a fast-approaching trial date.
11 At the urging of the primary trial counsel (David Marks and Michael Thamer),
12 extensive efforts were devoted to refining jury instructions and jury questionnaires,
13 summarizing key record support to meet the jury charge elements, and most
14 significantly, preparing video interviews of key family member and resident
15 witnesses.

16 15. Given an anticipated trial in mid-2024, all of that work had to be
17 undertaken. And by substantially completing those tasks prior to the January 2024
18 mediation, Class Counsel could credibly demonstrate with tangible work product
19 presented to the mediator that Plaintiffs were ready to try the lawsuit absent a
20 settlement. I believe strongly that the extensive preparation during the December
21 2023 meeting and thereafter directly impacted the mediator's case evaluation,
22 which in turn lead to her mediator's proposal (\$18.2 million plus injunctive relief)
23 upon with the settlement is based.

24 16. Ms. Gold questions the different travel time entries for three attorneys
25 who attended the Texas mediation/trial prep meeting. The travel time varied
26 because the three attorneys traveled from different home locations. I traveled from
27 San Diego, a relatively modest distance. In contrast, Megan Yarnall (Eureka) and
28 Michael Thamer (Callahan, California) traveled much greater distances, involving

1 multiple stops. Indeed, Mr. Thamer's travel from Callahan required driving to
2 Medford, Oregon, catching an early morning flight and then another connecting
3 flight to get to Texas.

4 17. In my view, the participation by Ms. Yarnall and Mr. Thamer was
5 critical. Among other contributions to Class Counsel's efforts, Ms. Yarnall's office
6 headed up the identification and initial interviews of family member and resident
7 witnesses. Her in-person participation in the follow-up witness interviewing work
8 undertaken by Mr. Marks' trial team was extremely important. The same is true for
9 Mr. Thamer. As the lead trial lawyer in several seminal California elder
10 prosecutions (including the Skilled Healthcare case tried to jury verdict), see Dkt
11 631-12, ¶12, Mr. Thamer's input on witness presentation, mediation arguments and
12 overall trial preparation was crucial.

13 18. As reflected in the lodestar reductions, travel to the December 2023
14 meeting (as with all travel time) has been discounted by 50%.

15 19. On October 23, 2024, my office emailed the Lodestar Summary (in
16 PDF format) to Ms. Gold in response to her request. Thereafter, Ms. Gold asked
17 that the Lodestar Summary be provided in Excel format, with the Schneider
18 Wallace hours sorted by chronological order. On October 25, 2024, my office
19 emailed the Lodestar Summary (in Excel format with the Schneider Wallace hours
20 sorted in chronological order).

21 20. In her objection, Ms. Gold asserts that certain tasks shown on the
22 Lodestar Summary (such as phone calls and meetings) were double or even triple
23 billed. To date, despite multiple requests from my office, Ms. Gold has not
24 provided any specific examples in the Lodestar Summary (or otherwise) to support
25 her assertion.

26 21. Regardless, the presence of a similar (or even same) description for
27 work performed does not establish double billing. Depending on the day in
28 question, an attorney may have actually participated in the multiple calls or

1 meetings, and properly recorded that time as discrete entries with the same narrative
2 description. My standard practice is to bill for only the time spent working on the
3 case. From long experience in this case and other litigation, I believe the same is
4 true for all Class Counsel.

5 22. In the detailed Cost Summary, under the Experts/Consultants category,
6 the line entries for several Class Counsel show payments made to Marks Balette as
7 reimbursement for the expert/consultant charges. That is because Marks Balette
8 advanced the initial payments to certain experts (principally MedModel and Dr.
9 Flores) and were subsequently reimbursed by other Class Counsel. The initial
10 expert payments are not included Marks Balette's request for costs/expense
11 reimbursement, given the reimbursements received from the Class Counsel.

12 23. Additionally, in the Cost Summary, the Marks Balette expenses
13 include expert consulting fees paid to Blake Peters of Superior Analytics. Mr.
14 Peters is contractor who exclusively provides data analytic services to Marks
15 Balette in support of the legal services provided by that firm. The scope of the work
16 performed by Mr. Peters/ Superior Analytics is detailed in Mr. Marks' declaration.
17 Dkt 631-11, ¶17(e).

18 24. The Marks Balette costs/expenses reimbursement request in this case
19 includes \$420,833.75 pertaining to Mr. Peters/Superior Analytics, which consists of
20 the following: (a) an SAS usage fee of \$1.623.75; and (b) a charge of \$419,210 for
21 the data analysis services provided by Mr. Peters/ Superior Analytics on the Sunrise
22 case. The \$419,210 includes an overhead markup of approximately .63 on the
23 \$256,155.52 that Marks Balette paid to Superior Analytics/Peters for work on the
24 Sunrise case.

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I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed on November 1, 2024 at San Diego, California

/s/Christopher J. Healey
Christopher J. Healey

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INDEX OF EXHIBITS TO
DECLARATION OF CHRISTOPHER J. HEALEY

<u>Exhibit No.</u>	<u>Description</u>
1	Updated Lodestar Summary
2	Cost Summary
3	Courtesy Discounted Cost Items

EXHIBIT 1

SUMMARY

Summary Tab

Lodestar Fees/Costs

<u>Firm</u>	<u>Lodestar</u>		<u>Reductions</u>		<u>Net Lodestar</u>		<u>Costs</u>
	Hours	Fees	Hours	Fees	Hours	Fees	
Dentons	5769.7	\$4,624,413	426.88	\$326,271	5342.82	\$4,298,142	\$460,624.56
Schneider Wallace	2849.7	\$2,816,323	533	\$365,548	2316.7	\$2,450,775	\$548,381.15
Marks	4505.6	\$2,956,567	471.07	\$287,194	4034.53	\$2,669,373	\$581,313.05
Stebner	4384.9	\$2,917,615	628.47	\$242,925	3756.43	\$2,674,690	\$48,045.49
Janssen	2622	\$1,140,528	278.73	\$130,533	2343.27	\$1,009,995	\$66,213.69
Thamer	336.8	\$301,436	54.45	\$48,729	282.35	\$252,707	\$4,618.60
Trails	346.2	\$225,030	41.89	\$27,463	304.31	\$197,567	\$51.00
Olivier	88.5	\$86,258	6.65	\$2,807	81.85	\$83,451	
Total	20903.4	\$15,068,169	2441.14	\$1,431,470	18462.26	\$13,636,699	\$1,709,247.54

Hourly Rates

Dentons

<u>Timekeeper</u>	<u>Position</u>	<u>Years of Experience</u>	<u>Hourly Rates</u>
Chris Healey	Partner	42	\$730-1205
Robert Cocchia	Partner	30	\$745-780
Carl Lehman	Associate	5	\$520
Alisha Lapkewych	Associate	9	\$450
Rachel Ross	Associate	6	\$405-445
Anastasiya Menshikova	Associate	8	\$300-415
Charles Hayes	Associate	9	\$380

Janssen Malloy LLP

W. Timothy Needham	Partner	44	\$895
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Megan Yarnall	Partner	13	\$550-650
William Stein	Associate	6	\$550
Frank Martin	Assocaite	2	\$400

Marks Balette

David Marks	Partner	46	\$950
Jacques Balette	Partner	27	\$750
Brent Moss	Partner	29	\$750

Olivier

Monique Olivier	Partner	27	\$1,050
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Stebner

Kathryn Stebner	Partner	39	\$795-925
Brian Umpierre	Associate	19	\$600-790
Kelly Knapp	Associate	17	\$590
Sarah Colby	Counsel	27	\$575
George Kawamoto	Associate	13	\$475

Schneider Wallace

Guy Wallace	Partner	29	\$1,188
Mark Johnson	Partner	46	\$888
Sarah Colby	Counsel	27	\$888
Jennifer Bybee	Counsel	16	\$888
Travis Close	Associate	9	\$888

Trails Law Group

Stefanie Warren	Partner	18	\$650
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Law Office of Michael Thamer

Michael Thamer	Partner	39	\$895
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DENTONS

Dentons US LLP - Lodestar Fees/Costs

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>	<u>Fees</u>	<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	5/25/2017 Menshikova, Anastasiya	Research consumer and employee complaints regarding Sunrise California facilities.	\$300	1.1	\$330.00								
	5/26/2017 Healey, Christopher J.	Correspondence regarding Laughlin representation.	\$730	0.2	\$146.00								
	5/26/2017 Menshikova, Anastasiya	Review draft Sunrise complaint.	\$300	1.7	\$510.00								
	5/30/2017 Healey, Christopher J.	Review draft complaint and comment regarding same.	\$730	2.5	\$1,825.00								
	5/30/2017 Healey, Christopher J.	Review CLRA letter and comment regarding same.	\$730	0.2	\$146.00								
	5/30/2017 Menshikova, Anastasiya	Meeting with Attorney Healey regarding Sunrise complaint.	\$300	0.1	\$30.00								
	5/31/2017 Healey, Christopher J.	Correspondence regarding draft complaint.	\$730	0.2	\$146.00								
	6/14/2017 Healey, Christopher J.	Prepare correspondence regarding complaint and SOL issue.	\$730	0.1	\$73.00								
	6/15/2017 Healey, Christopher J.	Review correspondence regarding complaint.	\$730	0.1	\$73.00								
	6/26/2017 Healey, Christopher J.	Review draft complaint.	\$730	0.3	\$219.00								
	6/26/2017 Healey, Christopher J.	Prepare correspondence regarding draft complaint.	\$730	0.2	\$146.00								
	6/26/2017 Healey, Christopher J.	Follow up correspondence regarding same.	\$730	0.6	\$438.00								
	6/26/2017 Menshikova, Anastasiya	Review and edit Sunrise complaint.	\$300	1.4	\$420.00								
	6/29/2017 Healey, Christopher J.	Review correspondence from defense counsel regarding extension. Prepare correspondence regarding correspondence from defense counsel regarding extension.	\$730	0.1	\$73.00								
	6/29/2017 Healey, Christopher J.	Review correspondence regarding case status.	\$730	0.1	\$73.00								
	7/17/2017 Healey, Christopher J.	Telephone call with team regarding settlement and tactics.	\$730	0.2	\$146.00			0.2	146.00				
	7/19/2017 Healey, Christopher J.	Prepare for Sunrise call.	\$730	0.1	\$73.00								
	7/21/2017 Healey, Christopher J.	Review defendants response to CLRA letter.	\$730	0.1	\$73.00								
	7/21/2017 Healey, Christopher J.	Correspondence regarding defendants response to CLRA letter.	\$730	0.1	\$73.00								
	7/21/2017 Healey, Christopher J.	Correspondence regarding arbitration call.	\$730	0.1	\$73.00								
	7/24/2017 Healey, Christopher J.	Review arbitration agreement.	\$730	0.2	\$146.00								
	7/24/2017 Healey, Christopher J.	Prepare for call.	\$730	0.2	\$146.00								
	7/24/2017 Healey, Christopher J.	Conference call with team re status and tactics.	\$730	0.4	\$292.00			0.4	292.00				
	7/24/2017 Healey, Christopher J.	Research regarding arbitration argument.	\$730	0.2	\$146.00								
	7/27/2017 Healey, Christopher J.	Conference call with team regarding status.	\$730	0.4	\$292.00			0.4	292.00				
	8/8/2017 Healey, Christopher J.	Correspondence regarding settlement status.	\$730	0.1	\$73.00								
	8/8/2017 Healey, Christopher J.	Response regarding settlement status.	\$730	0.1	\$73.00								
	9/21/2017 Healey, Christopher J.	Prepare for team call.	\$730	0.3	\$219.00								
	9/21/2017 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$730	0.1	\$73.00								
	9/22/2017 Healey, Christopher J.	Conference call with team re settlement.	\$730	0.2	\$146.00			0.2	146.00				
	10/9/2017 Healey, Christopher J.	Review CMC Statement.	\$730	0.1	\$73.00								
	10/9/2017 Healey, Christopher J.	Review and comment on complex designation pleading.	\$730	0.3	\$219.00								
	10/9/2017 Healey, Christopher J.	Prepare correspondence regarding same.	\$730	0.1	\$73.00								
	10/9/2017 Healey, Christopher J.	Follow up correspondence regarding same.	\$730	0.1	\$73.00								
	11/1/2017 Healey, Christopher J.	Travel to San Francisco for meeting with defense counsel.	\$730	2	\$1,460.00							2	1,460.00
	11/1/2017 Healey, Christopher J.	Pre-meeting with team regarding approach and questions.	\$730	1	\$730.00								
	11/1/2017 Healey, Christopher J.	Meet with defense counsel regarding claims and defenses.	\$730	1.5	\$1,095.00								
	11/1/2017 Healey, Christopher J.	Meet with Attorney Stebner regarding follow-up issues.	\$730	0.3	\$219.00								
	11/2/2017 Healey, Christopher J.	Return travel from San Francisco meeting.	\$730	2.5	\$1,825.00							2.5	1,825.00
	11/7/2017 Healey, Christopher J.	Review reassignment order and prepare correspondence regarding to-do issues.	\$730	0.1	\$73.00								
	11/10/2017 Healey, Christopher J.	Correspondence regarding settlement information list and schedule.	\$730	0.2	\$146.00								
	11/10/2017 Healey, Christopher J.	Revise list of information and items.	\$730	0.2	\$146.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	11/10/2017 Healey, Christopher J.	Prepare correspondence regarding same.	\$730	0.1		\$73.00									
	11/16/2017 Healey, Christopher J.	Review correspondence regarding settlement meeting.	\$730	0.1		\$73.00									
	11/16/2017 Healey, Christopher J.	Telephone call with Attorney Schwartz regarding settlement issues.	\$730	0.5		\$365.00									
	11/16/2017 Healey, Christopher J.	Prepare correspondence with team regarding suggested approach.	\$730	1		\$730.00									
	11/16/2017 Healey, Christopher J.	Follow up correspondence regarding same.	\$730	0.1		\$73.00									
	11/17/2017 Healey, Christopher J.	Prepare correspondence regarding revised approach for settlement discussions.	\$730	0.2		\$146.00									
	11/17/2017 Healey, Christopher J.	Revise letter to Attorney Schwartz.	\$730	0.4		\$292.00									
	11/27/2017 Healey, Christopher J.	Prepare correspondence regarding settlement status.	\$730	0.2		\$146.00									
	11/27/2017 Healey, Christopher J.	Review and comment on CMC Statement.	\$730	0.2		\$146.00									
	11/28/2017 Healey, Christopher J.	Prepare correspondence regarding settlement meeting.	\$730	0.2		\$146.00									
	11/28/2017 Healey, Christopher J.	Conference regarding settlement meeting.	\$730	0.1		\$73.00									
	11/28/2017 Healey, Christopher J.	Correspondence regarding same.	\$730	0.2		\$146.00									
	11/30/2017 Healey, Christopher J.	Prepare correspondence regarding settlement meeting.	\$730	0.2		\$146.00									
	12/1/2017 Healey, Christopher J.	Telephone call (message) to Attorney Schwartz.	\$730	0.1		\$73.00									
	12/1/2017 Healey, Christopher J.	Review correspondence.	\$730	0.1		\$73.00									
	12/4/2017 Healey, Christopher J.	Prepare correspondence regarding settlement meeting.	\$730	0.2		\$146.00									
	12/5/2017 Healey, Christopher J.	Prepare correspondence regarding CMC Statement and settlement meeting.	\$730	0.8		\$584.00									
	12/5/2017 Healey, Christopher J.	Telephone call with Attorney Schwartz regarding same.	\$730	0.2		\$146.00									
	12/5/2017 Healey, Christopher J.	Telephone call with team regarding settlement status.	\$730	0.3		\$219.00			0.3	219.00					
	12/5/2017 Healey, Christopher J.	Prepare correspondence to Attorney Schwartz regarding same.	\$730	0.7		\$511.00									
	12/6/2017 Healey, Christopher J.	Prepare correspondence to team regarding to do issues.	\$730	0.2		\$146.00									
	12/6/2017 Healey, Christopher J.	Prepare correspondence regarding settlement meeting.	\$730	0.1		\$73.00									
	12/6/2017 Healey, Christopher J.	Telephone call (messages) from Thamer regarding status.	\$730	0.1		\$73.00									
	12/6/2017 Healey, Christopher J.	Review arbitration agreements.	\$730	0.2		\$146.00									
	12/6/2017 Healey, Christopher J.	Outline analysis regarding same.	\$730	0.3		\$219.00									
	12/12/2017 Healey, Christopher J.	Prepare correspondence regarding case status.	\$730	0.1		\$73.00									
	12/13/2017 Healey, Christopher J.	Prepare for conference call.	\$730	0.2		\$146.00									
	12/13/2017 Healey, Christopher J.	Conference call with team regarding case status and tactics.	\$730	0.7		\$511.00			0.7	511.00					
	12/13/2017 Healey, Christopher J.	Research regarding amendment issues.	\$730	0.5		\$365.00									
	12/14/2017 Healey, Christopher J.	Prepare correspondence regarding case overview and approach.	\$730	0.1		\$73.00									
	12/14/2017 Healey, Christopher J.	Telephone call with Attorney Thamer regarding same.	\$730	0.1		\$73.00									
	12/14/2017 Healey, Christopher J.	Prepare correspondence to team regarding alternative approach.	\$730	0.2		\$146.00									
	12/15/2017 Healey, Christopher J.	Prepare correspondence regarding settlement approach.	\$730	0.7		\$511.00									
	12/15/2017 Healey, Christopher J.	Telephone call with Attorney Stebner regarding same.	\$730	0.2		\$146.00									
	12/18/2017 Healey, Christopher J.	Office conference regarding amended research.	\$730	0.1		\$73.00									
	12/18/2017 Healey, Christopher J.	Review cases.	\$730	0.1		\$73.00									
	12/18/2017 Healey, Christopher J.	Prepare correspondence to file regarding same.	\$730	0.3		\$219.00									
	12/21/2017 Healey, Christopher J.	Prepare correspondence regarding amendment issues.	\$730	0.2		\$146.00									
	1/11/2018 Healey, Christopher J.	Prepare correspondence regarding case status.	\$790	0.1		\$79.00									
	1/18/2018 Healey, Christopher J.	Telephone call with team regarding case status and tactics.	\$790	0.1		\$79.00			0.1	79.00					
	1/30/2018 Healey, Christopher J.	Review court order regarding magistrate assignment.	\$790	0.1		\$79.00									
	1/30/2018 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$790	0.1		\$79.00									
	1/30/2018 Healey, Christopher J.	Follow up correspondence regarding same.	\$790	0.1		\$79.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>	<u>Fees</u>	<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>		
	1/31/2018 Healey, Christopher J.	Review Attorney Knapp memorandum regarding arbitration.	\$790	0.2	\$158.00										
	2/5/2018 Healey, Christopher J.	Prepare correspondence regarding arbitration motion and status.	\$790	0.2	\$158.00										
	2/6/2018 Healey, Christopher J.	Telephone call with Attorney Stebner regarding status.	\$790	0.5	\$395.00										
	2/6/2018 Healey, Christopher J.	Review pleading challenge and outline response arguments.	\$790	2	\$1,580.00										
	2/6/2018 Healey, Christopher J.	Correspondence from Attorney Colby regarding same.	\$790	0.1	\$79.00										
	2/7/2018 Healey, Christopher J.	Review Attorney Knapp's correspondence regarding CLRA notice issue.	\$790	0.1	\$79.00										
	2/7/2018 Healey, Christopher J.	Analysis regarding opposition to pleading challenge.	\$790	0.5	\$395.00										
	2/8/2018 Healey, Christopher J.	Prepare correspondence regarding scheduling issues.	\$790	0.2	\$158.00										
	2/8/2018 Healey, Christopher J.	Telephone call with Attorney Schwartz regarding same.	\$790	0.3	\$237.00										
	2/8/2018 Healey, Christopher J.	Draft confirming email to Attorney Schwartz.	\$790	0.3	\$237.00										
	2/8/2018 Healey, Christopher J.	Prepare correspondence to team regarding status.	\$790	0.3	\$237.00										
	2/8/2018 Healey, Christopher J.	Review correspondence regarding scheduling issues.	\$790	0.1	\$79.00										
	2/8/2018 Healey, Christopher J.	Prepare correspondence regarding schedule for amendment.	\$790	0.2	\$158.00										
	2/12/2018 Healey, Christopher J.	Prepare correspondence regarding case scheduling stipulation.	\$790	0.1	\$79.00										
	2/12/2018 Healey, Christopher J.	Prepare stipulation regarding continuance.	\$790	0.1	\$79.00										
	2/12/2018 Healey, Christopher J.	File review and prepare to do list.	\$790	0.1	\$79.00										
	2/12/2018 Healey, Christopher J.	Office conference with Attorney Knapp regarding amended complaint.	\$790	0.2	\$158.00										
	2/13/2018 Healey, Christopher J.	Prepare correspondence regarding stipulation.	\$790	0.1	\$79.00										
	2/14/2018 Healey, Christopher J.	Prepare correspondence regarding draft stipulation.	\$790	0.1	\$79.00										
	2/14/2018 Healey, Christopher J.	Revise stipulation regarding hearing date.	\$790	0.2	\$158.00										
	2/14/2018 Healey, Christopher J.	Prepare correspondence with defense counsel regarding same.	\$790	0.1	\$79.00										
	2/15/2018 Healey, Christopher J.	Research regarding Rule 15 amendment.	\$790	0.4	\$316.00										
	2/15/2018 Healey, Christopher J.	Analysis regarding amended CLRA claim.	\$790	0.4	\$316.00										
	2/15/2018 Healey, Christopher J.	Prepare for conference call.	\$790	0.1	\$79.00										
	2/15/2018 Healey, Christopher J.	Conference call with team regarding status and tactics.	\$790	0.3	\$237.00					0.3	237.00				
	2/15/2018 Healey, Christopher J.	Review amended complaint.	\$790	0.3	\$237.00										
	2/15/2018 Healey, Christopher J.	Outline named rep specific facts.	\$790	0.2	\$158.00										
	2/15/2018 Healey, Christopher J.	Analysis regarding CLRA notice issue.	\$790	0.3	\$237.00										
	2/15/2018 Healey, Christopher J.	Prepare correspondence regarding same.	\$790	0.2	\$158.00										
	2/16/2018 Healey, Christopher J.	Follow up correspondence regarding same.	\$790	0.1	\$79.00										
	2/16/2018 Healey, Christopher J.	Prepare correspondence regarding stipulation extension.	\$790	0.1	\$79.00										
	2/16/2018 Healey, Christopher J.	Review and revise amended complaint.	\$790	1.4	\$1,106.00										
	2/16/2018 Healey, Christopher J.	Review background information and memorandum regarding witness interviews.	\$790	0.3	\$237.00										
	2/16/2018 Healey, Christopher J.	Prepare correspondence to team regarding status.	\$790	0.2	\$158.00										
	2/16/2018 Healey, Christopher J.	Review and revise amended complaint.	\$790	2.5	\$1,975.00										
	2/16/2018 Healey, Christopher J.	Research regarding Rule 15.	\$790	0.2	\$158.00										
	2/20/2018 Healey, Christopher J.	Review and respond to CLRA damages issues.	\$790	0.1	\$79.00										
	2/21/2018 Healey, Christopher J.	Prepare correspondence regarding amended complaint.	\$790	0.1	\$79.00										
	2/22/2018 Healey, Christopher J.	Prepare correspondence regarding amended complaint.	\$790	0.2	\$158.00										
	2/22/2018 Healey, Christopher J.	Review and revise amended complaint.	\$790	2.2	\$1,738.00										
	2/22/2018 Healey, Christopher J.	Conference with co-counsel regarding same.	\$790	1	\$790.00					1	790.00				
	2/22/2018 Healey, Christopher J.	Telephone call with team regarding status and tactics.	\$790	0.1	\$79.00					0.1	79.00				
	2/23/2018 Healey, Christopher J.	Correspondence regarding amended complaint.	\$790	0.3	\$237.00										
	2/23/2018 Healey, Christopher J.	Review and revise amended complaint.	\$790	1.8	\$1,422.00										

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	2/23/2018 Healey, Christopher J.	Telephone conferences with Attorney Stebner regarding case background.	\$790	0.6		\$474.00									
	2/23/2018 Healey, Christopher J.	Notice to defense counsel regarding amended complaint.	\$790	0.2		\$158.00									
	2/23/2018 Healey, Christopher J.	Further revisions to Amended Complaint.	\$790	0.4		\$316.00									
	2/23/2018 Healey, Christopher J.	Conference with Attorney Stebner regarding background facts.	\$790	0.2		\$158.00									
	2/23/2018 Healey, Christopher J.	Review GAL application and follow-up.	\$790	0.2		\$158.00									
	2/23/2018 Healey, Christopher J.	Review correspondence regarding York case status.	\$790	0.2		\$158.00									
	2/23/2018 Healey, Christopher J.	Follow-up correspondence regarding same.	\$790	0.1		\$79.00									
	2/26/2018 Healey, Christopher J.	Prepare for call with defense counsel.	\$790	0.2		\$158.00									
	2/26/2018 Healey, Christopher J.	Telephone conference with Attorney Schwartz regarding case status.	\$790	0.3		\$237.00									
	2/26/2018 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$790	0.2		\$158.00									
	2/26/2018 Healey, Christopher J.	Prepare correspondence regarding draft stipulation.	\$790	0.2		\$158.00									
	2/26/2018 Healey, Christopher J.	Prepare correspondence and follow-up instructions regarding Google searches on Sunrise, etc.	\$790	0.5		\$395.00									
	2/26/2018 Healey, Christopher J.	Prepare correspondence regarding motion to dismiss hearing date.	\$790	0.1		\$79.00									
	2/27/2018 Healey, Christopher J.	Prepare correspondence regarding hearing date.	\$790	0.1		\$79.00									
	2/27/2018 Healey, Christopher J.	Prepare correspondence regarding investigation follow up.	\$790	0.1		\$79.00									
	2/27/2018 Healey, Christopher J.	Draft stipulation.	\$790	0.2		\$158.00									
	2/27/2018 Healey, Christopher J.	Follow up regarding same.	\$790	0.1		\$79.00									
	2/27/2018 Healey, Christopher J.	Telephone call with Attorney Stebner regarding settlement approach.	\$790	0.2		\$158.00									
	2/28/2018 Healey, Christopher J.	Prepare correspondence regarding pleading stipulation.	\$790	0.2		\$158.00									
	2/28/2018 Healey, Christopher J.	Telephone call with Attorney Stebner regarding Lee call and status.	\$790	0.1		\$79.00									
	3/1/2018 Healey, Christopher J.	Conference call with team regarding status and tactics.	\$790	0.1		\$79.00				0.1	79.00				
	3/5/2018 Healey, Christopher J.	Prepare correspondence from court regarding hearing stipulation.	\$790	0.2		\$158.00									
	3/5/2018 Healey, Christopher J.	Prepare correspondence to Attorney Gibson regarding same.	\$790	0.1											
	3/5/2018 Healey, Christopher J.	Prepare correspondence to counsel and court regarding stipulation.	\$790	0.1											
	3/6/2018 Healey, Christopher J.	Draft stipulation regarding Case Management Conference.	\$790	0.2		\$158.00									
	3/6/2018 Healey, Christopher J.	Conference regarding same.	\$790	0.2											
	3/6/2018 Healey, Christopher J.	Follow up correspondence regarding same.	\$790	0.1											
	3/8/2018 Healey, Christopher J.	Telephone call regarding Yelp/Google reviews.	\$790	0.2		\$158.00									
	3/8/2018 Healey, Christopher J.	Office conference regarding same.	\$790	0.1											
	3/8/2018 Healey, Christopher J.	Telephone call to Attorney Thamer regarding status of Zelp reviews.	\$790	0.2		\$158.00									
	3/8/2018 Menshikova, Anastasiya	Conference call with Attorney Healey re Yelp reviews	\$335	1		\$335.00									
	3/15/2018 Healey, Christopher J.	Conference all with team regarding status and tactics.	\$790	0.3		\$237.00				0.3	237.00				
	3/19/2018 Healey, Christopher J.	Response to Attorney Stebner inquiry regarding key information required from Sunrise.	\$790	0.3		\$237.00									
	3/20/2018 Healey, Christopher J.	Telephone call with Attorney Stebner regarding Charlie Lee phone call.	\$790	0.2		\$158.00									
	3/21/2018 Healey, Christopher J.	Review correspondence regarding tax changes and prepare correspondence regarding same.	\$790	0.1		\$79.00									
	3/22/2018 Healey, Christopher J.	Review response regarding internet research.	\$790	0.2		\$158.00									
	3/22/2018 Healey, Christopher J.	Prepare correspondence regarding same.	\$790	0.1		\$79.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>					
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>		
							<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	3/23/2018 Healey, Christopher J.	Review background information on sunrise operation.	\$790	0.3		\$237.00						
	3/23/2018 Healey, Christopher J.	Analysis regarding resident assessment requirements and case theory.	\$790	0.8		\$632.00						
	3/23/2018 Healey, Christopher J.	Prepare correspondence to team regarding question list.	\$790	0.2		\$158.00						
	3/23/2018 Healey, Christopher J.	File review regarding case status.	\$790	0.3		\$237.00						
	3/26/2018 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding settlement meeting.	\$790	0.2		\$158.00						
	3/26/2018 Healey, Christopher J.	Follow up correspondence regarding settlement meeting.	\$790	0.1		\$79.00						
	3/27/2018 Healey, Christopher J.	Telephone call with Attorney Stebner regarding status.	\$790	0.1		\$79.00						
	3/28/2018 Healey, Christopher J.	Prepare correspondence regarding settlement meeting.	\$790	0.1		\$79.00						
	3/28/2018 Healey, Christopher J.	Office conference regarding internal disclosure requirements.	\$790	0.1		\$79.00						
	3/29/2018 Healey, Christopher J.	Review correspondence regarding CMC requirements and disclosure issues.	\$790	0.2		\$158.00						
	3/29/2018 Healey, Christopher J.	Conference call regarding discovery, status and tactics.	\$790	0.2		\$158.00						
	3/30/2018 Healey, Christopher J.	Review motion to dismiss amended complaint.	\$790	0.5		\$395.00						
	3/30/2018 Healey, Christopher J.	Prepare correspondence regarding potential RCFE expert and discussion regarding same.	\$790	0.1		\$79.00						
	3/30/2018 Healey, Christopher J.	Telephone call with Attorney Stebner regarding motion to dismiss response on arbitration issues.	\$790	0.1		\$79.00						
	3/30/2018 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$790	0.2		\$158.00						
	3/30/2018 Healey, Christopher J.	Review motion to dismiss brief and outline potential responses.	\$790	0.5		\$395.00						
	4/2/2018 Healey, Christopher J.	Office conference regarding arbitration research.	\$790	0.1		\$79.00						
	4/2/2018 Healey, Christopher J.	Outline opposition to motion to dismiss.	\$790	0.1		\$79.00						
	4/2/2018 Healey, Christopher J.	Prepare correspondence regarding April 30 meeting.	\$790	0.1		\$79.00						
	4/3/2018 Healey, Christopher J.	Prepare correspondence regarding electronic service.	\$790	0.2		\$158.00						
	4/3/2018 Healey, Christopher J.	Outline key question for April 30 meeting.	\$790	0.4		\$316.00						
	4/3/2018 Healey, Christopher J.	Outline opposition to motion to dismiss.	\$790	0.3		\$237.00						
	4/3/2018 Healey, Christopher J.	Prepare correspondence regarding declaration to oppose arbitration motion.	\$790	0.2		\$158.00						
	4/3/2018 Healey, Christopher J.	Draft opposition to motion to dismiss.	\$790	2.6		\$2,054.00						
	4/4/2018 Healey, Christopher J.	Review complaint.	\$790	0.1		\$79.00						
	4/4/2018 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding Heredia status.	\$790	0.2		\$158.00						
	4/4/2018 Healey, Christopher J.	Prepare correspondence regarding Lee meeting.	\$790	0.1		\$79.00						
	4/4/2018 Healey, Christopher J.	Work on opposition to motion to dismiss.	\$790	1.6		\$1,264.00						
	4/4/2018 Healey, Christopher J.	Conference regarding potential response to JD Pioneer survey.	\$790	0.2		\$158.00						
	4/4/2018 Healey, Christopher J.	Prepare correspondence regarding same.	\$790	0.1		\$79.00						
	4/4/2018 Menshikova, Anastasiya	Meeting with Attorney Healey regarding research related to Defendant's request for judicial notice.	\$335	0.3		\$100.50						
	4/4/2018 Menshikova, Anastasiya	E-mail Mr. Miller re research related to Defendant's request for judicial notice.	\$335	0.2		\$67.00						
	4/4/2018 Menshikova, Anastasiya	Review Defendant's Motion to Dismiss.	\$335	0.8		\$268.00						
	4/5/2018 Healey, Christopher J.	Telephone call with team regarding status and tactics.	\$790	0.2		\$158.00			0.2	158.00		
	4/5/2018 Healey, Christopher J.	Review and comment on Lee letter regarding settlement meeting.	\$790	0.2		\$158.00						
	4/6/2018 Healey, Christopher J.	Prepare correspondence regarding motion to dismiss opposition.	\$790	0.1		\$79.00						
	4/6/2018 Healey, Christopher J.	Prepare correspondence regarding JD Power Survey information.	\$790	0.1		\$79.00						

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	4/6/2018 Healey, Christopher J.	Draft motion to dismiss opposition.	\$790	2.5									
	4/6/2018 Healey, Christopher J.	Telephone call with team regarding opposition arguments.	\$790	0.2					0.2		158.00		
	4/6/2018 Healey, Christopher J.	Continue to draft opposition brief.	\$790	0.2									
	4/9/2018 Healey, Christopher J.	Prepare correspondence regarding opposition to motion to dismiss.	\$790	0.2									
	4/9/2018 Healey, Christopher J.	Draft opposition to motion to dismiss.	\$790	4.2									
	4/10/2018 Healey, Christopher J.	Draft opposition to motion to dismiss.	\$790	3.6									
	4/10/2018 Menshikova, Anastasiya	Review Defendant's brief and case law cited therein in support of the request for judicial notice and pull complaints in cited cases.	\$335	2.7									
	4/11/2018 Healey, Christopher J.	Conference regarding objection to JD Power stuff.	\$790	3									
	4/11/2018 Healey, Christopher J.	Draft opposition to motion to dismiss.	\$790	0.2									
	4/11/2018 Menshikova, Anastasiya	Review defendant's brief, cited J.D. Power award, articles regarding unreliability of J.D. Power reviews/awards, and conduct Google searches for additional articles discussing J.D. Power's unreliability.	\$335	2.2									
	4/12/2018 Healey, Christopher J.	Draft opposition to motion to dismiss.	\$790	4.7									
	4/12/2018 Menshikova, Anastasiya	Research whether courts can take judicial notice of J.D. Power awards/consumer reviews and courts' opinions regarding the reliability of J.D. Power awards	\$335	3.3									
	4/13/2018 Healey, Christopher J.	Draft opposition to motion to dismiss.	\$790	2.8									
	4/13/2018 Healey, Christopher J.	Prepare correspondence regarding follow-up on JD Power survey.	\$790	0.2									
	4/13/2018 Menshikova, Anastasiya	Review complaints on Glassdoor, Yelp, Google, and Care.com and draft summary.	\$335	1.2									
	4/16/2018 Healey, Christopher J.	Review related case notice in Emeritus.	\$790	0.1									
	4/16/2018 Healey, Christopher J.	Prepare correspondence regarding same.	\$790	0.1									
	4/18/2018 Healey, Christopher J.	Review draft insert to Attorney Stebner's declaration.	\$790	0.1									
	4/18/2018 Healey, Christopher J.	Prepare correspondence regarding same.	\$790	0.1									
	4/19/2018 Healey, Christopher J.	Prepare for call with team.	\$790	0.3									
	4/19/2018 Healey, Christopher J.	Conference call with team and follow up regarding same.	\$790	0.2					0.2		158.00		
	4/23/2018 Healey, Christopher J.	Prepare correspondence regarding opposition brief to motion to dismiss.	\$790	0.3									
	4/23/2018 Healey, Christopher J.	Office conference regarding revisions to motion to dismiss.	\$790	0.1									
	4/23/2018 Menshikova, Anastasiya	Renew and analysis re opposition to Defendant's motion to dismiss and transfer.	\$335	4.9									
	4/24/2018 Healey, Christopher J.	Prepare correspondence regarding Charlie Lee meeting.	\$790	0.2									
	4/24/2018 Healey, Christopher J.	Review and revise motion to dismiss opposition.	\$790	0.7									
	4/24/2018 Healey, Christopher J.	Telephone call with Attorneys Wallace and Colby regarding opposition brief.	\$790	0.2									
	4/24/2018 Menshikova, Anastasiya	Review and analysis re opposition to Defendant's motion to dismiss and transfer.	\$335	3.7									
	4/25/2018 Healey, Christopher J.	Revise motion to dismiss opposition brief.	\$790	0.7									
	4/25/2018 Healey, Christopher J.	Draft Attorney Stebner declaration.	\$790	0.3									
	4/25/2018 Healey, Christopher J.	Telephone call with Attorney Stebner regarding status.	\$790	0.2									
	4/26/2018 Healey, Christopher J.	Revise Attorney Stebner declaration.	\$790	1.5									
	4/26/2018 Healey, Christopher J.	Prepare correspondence to team regarding J.D. Power issue.	\$790	0.2									
	4/26/2018 Healey, Christopher J.	Revise opposition to motion to dismiss brief.	\$790	1.7									
	4/26/2018 Healey, Christopher J.	Office conference regarding same.	\$790	0.2									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	4/26/2018 Healey, Christopher J.	Conference call with team regarding status and tactics.	\$790	0.2	\$158.00								
	4/26/2018 Menshikova, Anastasiya	Review and revise opposition to Defendant's motion to dismiss/transfer.	\$335	0.4	\$134.00				0.2	158.00			
	4/27/2018 Menshikova, Anastasiya	Review and revise opposition to defendant's motion to dismiss/transfer.	\$335	1.9	\$636.50								
	4/27/2018 Pegan-Knight, Lidija	Cite-check the Opposition and Declaration.	\$350	4.4	\$1,540.00	4.4	1,540.00						
	4/30/2018 Healey, Christopher J.	Review and finalize opposition to motion to dismiss.	\$790	0.3	\$237.00								
	4/30/2018 Healey, Christopher J.	Office conference regarding opposition status.	\$790	0.1	\$79.00								
	4/30/2018 Healey, Christopher J.	Prepare correspondence regarding same.	\$790	0.1	\$79.00								
	4/30/2018 Menshikova, Anastasiya	Research case law supporting the proposition that federal courts have limited discretion to abstain from hearing cases satisfying the case or controversy requirement.	\$335	1.6	\$536.00								
	4/30/2018 Menshikova, Anastasiya	Review and finalize opposition.	\$335	2.1	\$703.50								
	5/2/2018 Healey, Christopher J.	Prepare correspondence to Attorney Colby regarding Rule 26 disclosures.	\$790	0.2	\$158.00								
	5/2/2018 Healey, Christopher J.	Prepare correspondence to Attorney Gibson regarding same.	\$790	0.1	\$79.00								
	5/2/2018 Healey, Christopher J.	Telephone call to Attorney Stebner's office regarding disclosures.	\$790	0.1	\$79.00								
	5/2/2018 Healey, Christopher J.	Analysis regarding Rule 26 disclosures.	\$790	0.3	\$237.00								
	5/2/2018 Healey, Christopher J.	Prepare correspondence to team regarding Rule 26 disclosures.	\$790	0.2	\$158.00								
	5/3/2018 Healey, Christopher J.	Office conference regarding witness interviews.	\$790	0.1	\$79.00								
	5/3/2018 Healey, Christopher J.	Prepare correspondence regarding same.	\$790	0.1	\$79.00								
	5/3/2018 Menshikova, Anastasiya	Call former Sunrise employees (Imogene and Juliana) and leave voicemails.	\$335	0.4	\$134.00								
	5/8/2018 Healey, Christopher J.	Telephone call with Attorney Stebner are regarding Rule 26 disclosure issues.	\$790	0.1	\$79.00								
	5/14/2018 Healey, Christopher J.	Prepare correspondence regarding rule 26 disclosures and meet/confer.	\$790	0.2	\$158.00								
	5/14/2018 Healey, Christopher J.	Prepare correspondence regarding settlement meeting and follow-up regarding same.	\$790	0.1	\$79.00								
	5/15/2018 Healey, Christopher J.	Prepare correspondence regarding Rule 26 disclosures issues.	\$790	0.2	\$158.00								
	5/15/2018 Healey, Christopher J.	Telephone call with Attorney Wallace regarding Rule 26 disclosures issues.	\$790	0.2	\$158.00								
	5/15/2018 Healey, Christopher J.	Prepare for call.	\$790	0.1	\$79.00								
	5/15/2018 Healey, Christopher J.	Telephone call with defense counsel regarding disclosures.	\$790	0.7	\$553.00								
	5/15/2018 Healey, Christopher J.	Prepare correspondence to team regarding same	\$790	0.5	\$395.00								
	5/15/2018 Healey, Christopher J.	Office conference regarding witness interviews.	\$790	0.2	\$158.00								
	5/15/2018 Menshikova, Anastasiya	Call with Imogene Cortez.	\$335	0.6	\$201.00								
	5/17/2018 Healey, Christopher J.	Telephone call with Attorney Stebner regarding ADR issue and status.	\$790	0.2	\$158.00								
	5/17/2018 Healey, Christopher J.	Prepare correspondence with Ms. Gibson regarding ADR option and document issues.	\$790	0.2	\$158.00								
	5/17/2018 Healey, Christopher J.	Follow-up correspondence regarding document issues.	\$790	0.1	\$79.00								
	5/17/2018 Healey, Christopher J.	Prepare correspondence regarding ADR options and document issues.	\$790	0.2	\$158.00								
	5/22/2018 Healey, Christopher J.	Review reply brief regarding motion to dismiss.	\$790	0.2	\$158.00								
	5/24/2018 Healey, Christopher J.	Review and analysis of joint case management conference statement.	\$790	0.3	\$237.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>							
				<u>Worked</u>			<u>General</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	5/24/2018 Healey, Christopher J.	Prepare correspondence regarding case management conference issues.	\$790	0.2		\$158.00								
	5/24/2018 Healey, Christopher J.	Prepare correspondence regarding case status.	\$790	0.2		\$158.00								
	5/29/2018 Healey, Christopher J.	Prepare correspondence regarding Rule 26(f) report.	\$790	0.2		\$158.00								
	5/30/2018 Healey, Christopher J.	Prepare correspondence regarding case management conference statement.	\$790	0.1		\$79.00								
	5/30/2018 Healey, Christopher J.	Review and comment on draft case management conference statement.	\$790	0.3		\$237.00								
	5/30/2018 Healey, Christopher J.	Revise case management conference statement.	\$790	0.2		\$158.00								
	5/30/2018 Healey, Christopher J.	Prepare correspondence to defense counsel regarding same.	\$790	0.1		\$79.00								
	5/31/2018 Healey, Christopher J.	Prepare for team call.	\$790	0.1		\$79.00								
	5/31/2018 Healey, Christopher J.	Review and comment on case management conference statement.	\$790	0.2		\$158.00								
	5/31/2018 Healey, Christopher J.	Prepare for team call.	\$790	0.3		\$237.00								
	6/1/2018 Healey, Christopher J.	Prepare for conference call.	\$790	0.6		\$474.00								
	6/1/2018 Healey, Christopher J.	Participate in conference call regarding strategy and tactics.	\$790	0.9		\$711.00								
	6/2/2018 Healey, Christopher J.	Prepare for hearing.	\$790	0.1		\$79.00								
	6/6/2018 Healey, Christopher J.	Prepare for hearing.	\$790	0.5		\$395.00								
	6/6/2018 Healey, Christopher J.	Telephone calls with Attorney Stebner regarding status.	\$790	0.3		\$237.00								
	6/6/2018 Healey, Christopher J.	Prepare correspondence to team regarding hearing.	\$790	0.2		\$158.00								
	6/6/2018 Healey, Christopher J.	Continue to prepare for motion hearings.	\$790	3.7		\$2,923.00								
	6/6/2018 Healey, Christopher J.	Office conferences regarding same.	\$790	0.3		\$237.00								
	6/7/2018 Healey, Christopher J.	Travel to San Francisco/Oakland for motion to dismiss hearing.	\$790	2		\$1,580.00							2	1,580.00
	6/7/2018 Healey, Christopher J.	Prepare for hearing.	\$790	2		\$1,580.00								
	6/7/2018 Healey, Christopher J.	Attend hearing.	\$790	0.8		\$632.00								
	6/7/2018 Healey, Christopher J.	Status report to team regarding same.	\$790	0.5		\$395.00								
	6/8/2018 Healey, Christopher J.	Return travel to San Diego from hearing.	\$790	2		\$1,580.00							2	1,580.00
	6/12/2018 Healey, Christopher J.	Prepare correspondence regarding Sali decision and class certification issues.	\$790	0.2		\$158.00								
	6/12/2018 Healey, Christopher J.	Review defendant's letter to court regarding additional briefing.	\$790	0.1		\$79.00								
	6/12/2018 Healey, Christopher J.	Prepare correspondence regarding same.	\$790	0.1		\$79.00								
	6/13/2018 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding defendant's supplemental brief.	\$790	0.1		\$79.00								
	6/27/2018 Healey, Christopher J.	Review Attorney Gibson email regarding status court report.	\$790	0.1		\$79.00								
	6/27/2018 Healey, Christopher J.	Prepare correspondence to Tim regarding same.	\$790	0.1		\$79.00								
	6/29/2018 Healey, Christopher J.	Prepare correspondence regarding class certification payments.	\$790	0.3		\$237.00								
	6/29/2018 Healey, Christopher J.	Follow-up correspondence regarding class.	\$790	0.2		\$158.00								
	8/20/2018 Healey, Christopher J.	Telephone call with Attorney Stebner regarding case status.	\$790	0.2		\$158.00								
	8/20/2018 Healey, Christopher J.	Research regarding time limit for court decision.	\$790	0.2		\$158.00								
	8/20/2018 Healey, Christopher J.	Prepare correspondence regarding same.	\$790	0.1		\$79.00								
	9/10/2018 Healey, Christopher J.	Prepare correspondence regarding witness interviews.	\$790	0.1		\$79.00								
	9/20/2018 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding mediation.	\$790	0.1		\$79.00								
	9/21/2018 Healey, Christopher J.	Prepare correspondence regarding settlement.	\$790	0.1		\$79.00								
	10/3/2018 Healey, Christopher J.	Research regarding injunctive relief issue as applied to Ganz.	\$790	0.5		\$395.00								
	10/3/2018 Healey, Christopher J.	Telephone call with Attorney Stebner regarding same.	\$790	0.2		\$158.00								
	10/4/2018 Healey, Christopher J.	Review correspondence regarding contact from former Sunrise employee.	\$790	0.1		\$79.00								
	10/4/2018 Healey, Christopher J.	Prepare response regarding same.	\$790	0.1		\$79.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>			
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	10/5/2018 Healey, Christopher J.	Telephone call with Pat Kennedy regarding potential expert analysis.	\$790	0.1		\$79.00								
	10/8/2018 Healey, Christopher J.	Review correspondence from Pat Kennedy's office and prepare	\$790	0.1		\$79.00								
	10/8/2018 Healey, Christopher J.	correspondence to team regarding same.	\$790	0.1		\$79.00								
	10/8/2018 Healey, Christopher J.	Outline list of background materials for Mr. Kennedy.	\$790	0.2		\$158.00								
	10/8/2018 Healey, Christopher J.	Analysis regarding damages expert testimony.	\$790	0.1		\$79.00								
	10/16/2018 Healey, Christopher J.	Prepare correspondence regarding potential witness interview.	\$790	0.1		\$79.00								
	10/16/2018 Healey, Christopher J.	Prepare correspondence regarding potential appeal and transfer	\$790	0.2		\$158.00								
	10/31/2018 Healey, Christopher J.	order.	\$790	0.2		\$158.00								
	11/1/2018 Healey, Christopher J.	Review defense counsel letter regarding transfer to Santa Ana	\$790	0.2		\$158.00								
	11/1/2018 Healey, Christopher J.	division.	\$790	0.1		\$79.00								
	11/1/2018 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$790	0.1		\$79.00								
	11/1/2018 Healey, Christopher J.	Research regarding same.	\$790	0.2		\$158.00								
	11/1/2018 Healey, Christopher J.	Conference regarding transfer assignment.	\$790	0.2		\$158.00								
	11/1/2018 Healey, Christopher J.	Review defendant's clarification letter regarding same.	\$790	0.2		\$158.00								
	11/1/2018 Healey, Christopher J.	Draft to-do list.	\$790	0.2		\$158.00								
	11/2/2018 Healey, Christopher J.	Revise response to defendant's clarification request.	\$790	0.1		\$79.00								
	11/2/2018 Healey, Christopher J.	Prepare correspondence to team regarding status.	\$790	0.1		\$79.00								
	11/2/2018 Healey, Christopher J.	Review defendant's administration motion for clarification.	\$790	0.1		\$79.00								
	11/2/2018 Healey, Christopher J.	Draft response to administrative motion.	\$790	0.3		\$237.00								
	11/5/2018 Healey, Christopher J.	Telephone calls with Attorney Stebner regarding Charlie Lee	\$790	0.3		\$237.00								
	11/5/2018 Healey, Christopher J.	meeting and follow-up.	\$790	0.2		\$158.00								
	11/5/2018 Healey, Christopher J.	Follow-up conferences regarding Sunrise issue.	\$790	0.2		\$158.00								
	11/6/2018 Healey, Christopher J.	Prepare correspondence to team regarding judicial assignment.	\$790	0.1		\$79.00								
	11/6/2018 Healey, Christopher J.	Review court assignment	\$790	0.2		\$158.00								
	11/6/2018 Healey, Christopher J.	Review case list of Judge Staton decisions.	\$790	0.1		\$79.00								
	11/6/2018 Healey, Christopher J.	Prepare correspondence regarding same.	\$790	0.1		\$79.00								
	11/6/2018 Valero, Carmen A.	Research Judge Staton's opinions re: class certification, UCL, and	\$360	0.5		\$180.00								
	11/6/2018 Valero, Carmen A.	CLRA, for C. Healey.	\$360	0.5		\$180.00								
	11/8/2018 Healey, Christopher J.	Telephone call with Attorney Stebner regarding Charlie Lee meeting.	\$790	0.1		\$79.00								
	11/9/2018 Healey, Christopher J.	Prepare for meeting and outline approach.	\$790	0.2		\$158.00								
	11/26/2018 Healey, Christopher J.	Prepare correspondence regarding Lee meeting.	\$790	0.2		\$158.00								
	11/27/2018 Healey, Christopher J.	Prepare correspondence regarding Lee meeting.	\$790	0.3		\$237.00								
	11/27/2018 Healey, Christopher J.	Prepare correspondence regarding case status.	\$790	0.1		\$79.00								
	11/30/2018 Healey, Christopher J.	Telephone call with Attorneys Stebner and Thamer regarding	\$790	0.1		\$79.00								
	11/30/2018 Healey, Christopher J.	Charlie Lee meeting and preparation.	\$790	0.1		\$79.00								
	12/3/2018 Healey, Christopher J.	Review correspondence from defense counsel regarding motion	\$790	0.2		\$158.00								
	12/3/2018 Healey, Christopher J.	practice.	\$790	0.2		\$158.00								
	12/4/2018 Healey, Christopher J.	Review file regarding arbitration issues.	\$790	0.5		\$395.00								
	12/4/2018 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$790	0.3		\$237.00								
	12/4/2018 Healey, Christopher J.	Prepare correspondence with defense counsel regarding motion to	\$790	0.3		\$237.00								
	12/4/2018 Healey, Christopher J.	dismiss hearing and potential stipulation regarding arbitration.	\$790	0.1		\$79.00								
	12/4/2018 Healey, Christopher J.	Review updated motion to dismiss.	\$790	2.2		\$1,738.00								
	12/5/2018 Healey, Christopher J.	Review file in preparation for Charlie Lee meeting.	\$790	0.3		\$237.00								
	12/5/2018 Healey, Christopher J.	Review court order regarding scheduling conference.	\$790	0.2		\$158.00								
	12/5/2018 Healey, Christopher J.	Review local rules regarding motion timing.	\$790	0.2		\$158.00								
	12/5/2018 Healey, Christopher J.	Telephone call with team regarding Charlie Lee meeting and prepare	\$790	1		\$790.00			1		790.00			

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	12/6/2018 Healey, Christopher J.	Travel to San Francisco for meeting with Charlie Lee.	\$790	2.5		\$1,975.00								
	12/6/2018 Healey, Christopher J.	Meet with Attorney Stebner to prepare for Charlie Lee meeting.	\$790	0.5		\$395.00								
	12/6/2018 Healey, Christopher J.	Meet with Attorney Lee regarding potential settlement.	\$790	2		\$1,580.00								
	12/6/2018 Healey, Christopher J.	Meeting with team regarding summary follow-up.	\$790	0.5		\$395.00								
	12/6/2018 Healey, Christopher J.	Return travel to San Diego from Attorney Lee meeting.	\$790	2.5		\$1,975.00							2.5	1,975.00
	12/6/2018 Healey, Christopher J.	Outline position regarding arbitration issues.	\$790	0.8		\$632.00								
	12/7/2018 Healey, Christopher J.	Prepare correspondence to Attorney Needham regarding arbitration research.	\$790	0.1		\$79.00								
	12/7/2018 Healey, Christopher J.	Review Judge Staton's cases regarding arbitration and class certification.	\$790	0.5		\$395.00								
	12/7/2018 Healey, Christopher J.	Outline to-do list.	\$790	0.2		\$158.00								
	12/7/2018 Healey, Christopher J.	Telephone call with Attorneys Needham and Colby regarding arbitration issues.	\$790	0.5		\$395.00								
	12/7/2018 Healey, Christopher J.	Telephone call with Attorney Schwartz regarding arbitration issues.	\$790	0.3		\$237.00								
	12/7/2018 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$790	0.2		\$158.00								
	12/8/2018 Healey, Christopher J.	Prepare correspondence to Attorney Schwartz regarding Heredia.	\$790	0.1		\$79.00								
	12/8/2018 Healey, Christopher J.	Outline proposal regarding case resolution.	\$790	0.1		\$79.00								
	12/9/2018 Healey, Christopher J.	Draft proposed letter to Charles Lee.	\$790	0.7		\$553.00								
	12/10/2018 Healey, Christopher J.	Rule review and prepare to do list.	\$790	0.1		\$79.00								
	12/14/2018 Healey, Christopher J.	Telephone call with Attorney Stebner regarding Heredia status and options.	\$790	0.1		\$79.00								
	12/14/2018 Healey, Christopher J.	Review correspondence regarding arbitration issues.	\$790	0.1		\$79.00								
	12/14/2018 Healey, Christopher J.	Prepare correspondence regarding interview.	\$790	0.2		\$158.00								
	12/18/2018 Healey, Christopher J.	Telephone calls with Attorney Stebner regarding witness interviews.	\$790	0.3		\$237.00								
	12/19/2018 Healey, Christopher J.	Telephone call to see CANHR regarding Sunrise facilities.	\$790	0.2		\$158.00								
	12/19/2020 Healey, Christopher J.	Telephone call (message) from Chicotel regarding sunrise issues.	\$790	0.1		\$79.00								
	12/20/2018 Healey, Christopher J.	Telephone call with CANHR regarding resident inquiry.	\$790	0.1		\$79.00								
	12/20/2018 Healey, Christopher J.	Telephone call with Attorney Stebner regarding status and tactics.	\$790	0.1		\$79.00								
	12/27/2018 Healey, Christopher J.	Prepare correspondence regarding settlement status.	\$790	0.1		\$79.00								
	12/27/2018 Healey, Christopher J.	Revise letter to Attorney Lee.	\$790	0.5		\$395.00								
	12/27/2002 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding same.	\$790	0.1		\$79.00								
	1/7/2019 Healey, Christopher J.	Review file and conference with Kelsey regarding research project.	\$830	0.2		\$166.00								
	1/7/2019 Healey, Christopher J.	Outline responses to Defendant's re-noticed Motion to Dismiss.	\$830	1		\$830.00								
	1/8/2019 Healey, Christopher J.	Review Defendants' response to settlement proposal.	\$830	0.1		\$83.00								
	1/9/2019 Healey, Christopher J.	Prepare correspondence regarding motion to strike.	\$830	0.2		\$166.00								
	1/9/2019 Healey, Christopher J.	Review Defendant's motion to strike class allegations.	\$830	0.3		\$249.00								
	1/9/2019 Healey, Christopher J.	Prepare correspondence regarding Heredia decision.	\$830	0.1		\$83.00								
	1/9/2019 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding status.	\$830	0.1		\$83.00								
	1/10/2019 Healey, Christopher J.	Correspondence regarding opposition to motion to strike.	\$830	0.1		\$83.00								
	1/10/2019 Healey, Christopher J.	Correspondence regarding Defendants' request to seal agreements.	\$830	0.1		\$83.00								
	1/10/2019 Healey, Christopher J.	Correspondence to Attorney Wallace regarding motion to strike response.	\$830	0.1		\$83.00								
	1/13/2019 Healey, Christopher J.	Prepare correspondence regarding motion to strike hearing.	\$830	0.1		\$83.00								
	1/14/2019 Healey, Christopher J.	Review correspondence regarding lease to amend.	\$830	0.1		\$83.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	1/4/2019 Healey, Christopher J.	Prepare correspondence to Stebner office regarding assistance on opposition brief.	\$830	0.1	\$83.00								
	1/18/2019 Healey, Christopher J.	Office conference with Attorney Ortiz regarding opposition to motion to strike.	\$830	0.3	\$249.00								
	1/18/2019 Lapkewych, Alisha N.	Confer with C. Healey regarding opposition to strike class allegations.	\$450	1.2	\$540.00								
	1/18/2019 Lapkewych, Alisha N.	Review and analysis of defendant's motion to strike class allegations.	\$450	1.1	\$495.00								
	1/22/2019 Healey, Christopher J.	Office conference with Attorney Menshikova regarding arbitration research.	\$830	0.1	\$83.00								
	1/22/2019 Healey, Christopher J.	Review Colby memorandum regarding motion to strike opposition.	\$830	0.2	\$166.00								
	1/22/2019 Healey, Christopher J.	Correspondence regarding motion to dismiss issues.	\$830	0.2	\$166.00								
	1/23/2019 Healey, Christopher J.	Review defendant's motion to strike class allegations and outline potential response.	\$830	0.5	\$415.00								
	1/23/2019 Healey, Christopher J.	Office conference regarding opposition to motion to strike and related points.	\$830	1	\$830.00								
	1/23/2019 Healey, Christopher J.	Follow-up correspondence regarding potential additional plaintiffs.	\$830	0.1	\$83.00								
	1/23/2019 Healey, Christopher J.	Outline overview section to motion to strike response.	\$830	0.3	\$249.00								
	1/23/2019 Healey, Christopher J.	Correspondence regarding potential new plaintiff.	\$830	0.2	\$166.00								
	1/23/2019 Healey, Christopher J.	Analysis regarding Ganz ability to serve as adequate representative for "subject to arbitration" group.	\$830	0.2	\$166.00								
	1/23/2019 Menshikova, Anastasiya	Meet with Attorneys Healey and Ortiz to discuss case strategy.	\$415	1	\$415.00								
	1/23/2019 Lapkewych, Alisha N.	Continue reviewing defendant's motion to strike class allegations.	\$450	0.3	\$135.00								
	1/23/2019 Lapkewych, Alisha N.	Conduct research related to same.	\$450	2.7	\$1,215.00								
	1/23/2019 Lapkewych, Alisha N.	Confer with C. Healey and A. Menshikova.	\$450	0.2	\$90.00								
	1/23/2019 Lapkewych, Alisha N.	Begin drafting opposition to motion to strike class allegations.	\$450	3	\$1,350.00								
	1/24/2019 Healey, Christopher J.	Correspondence with team regarding potential standing argument regarding plaintiff Ganz.	\$830	0.3	\$249.00								
	1/24/2019 Healey, Christopher J.	Telephone conference with Attorney Colby regarding motion to strike opposition.	\$830	0.3	\$249.00								
	1/24/2019 Healey, Christopher J.	Review Ganz agreements.	\$830	0.3	\$249.00								
	1/24/2019 Healey, Christopher J.	Prepare correspondence to team regarding options.	\$830	0.2	\$166.00								
	1/24/2019 Lapkewych, Alisha N.	Correspondence regarding potentially adding named plaintiff.	\$450	0.1	\$45.00								
	1/24/2019 Lapkewych, Alisha N.	Continue conducting research for and drafting opposition to motion to strike class allegations.	\$450	0.5	\$225.00								
	1/25/2019 Healey, Christopher J.	Review Schartz email regarding Rule 11 threat.	\$830	0.1	\$83.00								
	1/25/2019 Healey, Christopher J.	Correspondence with Attorney Stebner regarding same.	\$830	0.1	\$83.00								
	1/25/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.1	\$83.00								
	1/25/2019 Healey, Christopher J.	Analysis regarding Rule 11 threat and outline response.	\$830	0.2	\$166.00								
	1/25/2019 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Sunrise allegations.	\$830	0.2	\$166.00								
	1/25/2019 Healey, Christopher J.	Analysis regarding potential amended complaint.	\$830	1	\$830.00								
	1/25/2019 Healey, Christopher J.	Research regarding Sunrise corporate structure and loan covenant issues.	\$830	1.2	\$996.00								
	1/25/2019 Healey, Christopher J.	Prepare correspondence to Attorney Needham regarding same.	\$830	0.1	\$83.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>							
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Travel</u>	<u>Fees</u>
							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	1/25/2019 Menshikova, Anastasiya	Research whether issues regarding whether arbitration agreements on a class-wide basis can be decided at the pleading stages.	\$415	4.4		\$1,826.00								
	1/25/2019 Valero, Carmen A.	Research public records and retrieve property reports on 3 addresses, for C. Healey.	\$360	0.2		\$72.00								
	1/26/2019 Healey, Christopher J.	Draft response to Gibson probable cause letter.	\$830	0.5		\$415.00								
	1/27/2019 Healey, Christopher J.	Revise response letter to Gibson.	\$830	1.2		\$996.00								
	1/27/2019 Healey, Christopher J.	Outline response to motion to dismiss.	\$830	0.2		\$166.00								
	1/27/2019 Healey, Christopher J.	Outline introduction section to motion to strike.	\$830	0.5		\$415.00								
	1/27/2019 Menshikova, Anastasiya	Continue researching whether arbitration issues related to the class can be decided at the pleading stage and review and analyze cases cited by Sunrise writing brief summaries distinguishing cases.	\$415	7.7		\$3,195.50								
	1/27/2019 Lapkewych, Alisha N.	Continue drafting opposition to motion to strike class allegations.	\$450	0.4		\$180.00								
	1/28/2019 Healey, Christopher J.	Prepare correspondence regarding Rule 26 Conference.	\$830	0.1		\$83.00								
	1/28/2019 Lapkewych, Alisha N.	Continue drafting opposition to motion to strike class allegations.	\$450	3.2		\$1,440.00								
	1/29/2019 Lapkewych, Alisha N.	Continue drafting opposition to motion to strike.	\$450	4.7		\$2,115.00								
	1/30/2019 Lapkewych, Alisha N.	Continue drafting opposition to motion to strike class allegations.	\$450	1.4		\$630.00								
	1/31/2019 Lapkewych, Alisha N.	Continue drafting opposition to motion to strike class allegations.	\$450	5.4		\$2,430.00								
	2/1/2019 Healey, Christopher J.	Review draft opposition to motion to strike.	\$830	0.2		\$166.00								
	2/1/2019 Healey, Christopher J.	Outline opposition to motion to dismiss.	\$830	0.2		\$166.00								
	2/1/2019 Healey, Christopher J.	Review Rule 26(f) report requirements.	\$830	1		\$830.00								
	2/1/2019 Healey, Christopher J.	Correspondence regarding same.	\$830	0.2		\$166.00								
	2/1/2019 Lapkewych, Alisha N.	Continue drafting opposition to motion to strike class allegations.	\$450	3.4		\$1,530.00								
	2/2/2019 Healey, Christopher J.	Draft opposition to Defendants' supplemental motion to dismiss brief.	\$830	3.2		\$2,656.00								
	2/2/2019 Lapkewych, Alisha N.	Continue drafting opposition to motion to strike.	\$450	1.2		\$540.00								
	2/3/2019 Healey, Christopher J.	Correspondence regarding CMC meet and confer.	\$830	0.2		\$166.00								
	2/3/2019 Healey, Christopher J.	Continue drafting opposition to motion to dismiss.	\$830	5.1		\$4,233.00	1	830.00						
	2/4/2019 Healey, Christopher J.	Review motion to strike opposition.	\$830	0.1		\$83.00								
	2/4/2019 Healey, Christopher J.	Prepare correspondence regarding same.	\$830	0.1		\$83.00								
	2/4/2019 Healey, Christopher J.	Office conference regarding motion to strike opposition.	\$830	0.2		\$166.00								
	2/4/2019 Healey, Christopher J.	Draft opposition to motion to dismiss.	\$830	2.7		\$2,241.00								
	2/4/2019 Healey, Christopher J.	Draft case update.	\$830	0.6		\$498.00								
	2/4/2019 Lapkewych, Alisha N.	Continue drafting opposition to motion to strike class allegations.	\$450	1.2		\$540.00								
	2/5/2019 Healey, Christopher J.	Draft opposition to motion to dismiss.	\$830	2		\$1,660.00								
	2/5/2019 Healey, Christopher J.	Correspondence regarding case status.	\$830	0.1		\$83.00								
	2/5/2019 Healey, Christopher J.	Correspondence regarding document requests regarding management fees and conference regarding same.	\$830	0.1		\$83.00								
	2/5/2019 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding status and case strategy.	\$830	2		\$1,660.00								
	2/5/2019 Healey, Christopher J.	Revise motion to dismiss opposition.	\$830	4.5		\$3,735.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
		Telephone conference with opposing counsel regarding Rule 26(f) report.	\$830	0.3	\$249.00								
		Follow-up correspondence regarding same.	\$830	0.2	\$166.00								
		Correspondence regarding motion to strike opposition.	\$830	0.2	\$166.00								
		Further revisions to motion to strike.	\$830	0.2	\$166.00								
		Prepare correspondence to team regarding draft opposition.	\$830	0.1	\$83.00								
		Revise response to Rule 11 threat.	\$830	0.1	\$83.00								
		Prepare correspondence to team.	\$830	0.1	\$83.00								
		2/5/2019 Menshikova, Anastasiya	\$415	1	\$415.00								
		2/5/2019 Menshikova, Anastasiya	\$415	0.2	\$83.00								
		2/5/2019 Lapkewych, Alisha N.	\$450	3.9	\$1,755.00								
		2/6/2019 Healey, Christopher J.	\$830	0.1	\$83.00								
		2/6/2019 Healey, Christopher J.	\$830	1.7	\$1,411.00								
		2/6/2019 Healey, Christopher J.	\$830	0.2	\$166.00								
		2/6/2019 Healey, Christopher J.	\$830	0.1	\$83.00								
		2/6/2019 Healey, Christopher J.	\$830	1	\$830.00								
		2/6/2019 Healey, Christopher J.	\$830	0.5	\$415.00								
		2/6/2019 Healey, Christopher J.	\$830	2	\$1,660.00								
		2/6/2019 Menshikova, Anastasiya	\$415	2.2	\$913.00								
		2/7/2019 Healey, Christopher J.	\$830	0.1	\$83.00								
		2/7/2019 Healey, Christopher J.	\$830	1	\$830.00								
		2/7/2019 Healey, Christopher J.	\$830	2.2	\$1,826.00								
		2/7/2019 Healey, Christopher J.	\$830	0.3	\$249.00								
		2/7/2019 Healey, Christopher J.	\$830	1	\$830.00								
		2/7/2019 Healey, Christopher J.	\$830	1	\$830.00								
		2/7/2019 Healey, Christopher J.	\$830	0.2	\$166.00								
		2/7/2019 Lapkewych, Alisha N.	\$450	4.8	\$2,160.00								
		2/8/2019 Smith, Suzanne D.	\$340	3.5	\$1,190.00			3.5	1,190.00				
		2/8/2019 Healey, Christopher J.	\$830	0.1	\$83.00								
		2/8/2019 Healey, Christopher J.	\$830	0.2	\$166.00								
		2/8/2019 Healey, Christopher J.	\$830	2	\$1,660.00								
		2/8/2019 Healey, Christopher J.	\$830	0.5	\$415.00								
		2/8/2019 Healey, Christopher J.	\$830	1	\$830.00								
		2/8/2019 Healey, Christopher J.	\$830	0.2	\$166.00								
		2/8/2019 Healey, Christopher J.	\$830	1	\$830.00								
		2/8/2019 Healey, Christopher J.	\$830	0.1	\$83.00								
		2/8/2019 Healey, Christopher J.	\$830	0.1	\$83.00								
		2/8/2019 Lapkewych, Alisha N.	\$450	5.6	\$2,520.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	2/8/2019 Lapkewych, Alisha N.	Cite check same.	\$450	0.3									
	2/8/2019 Lapkewych, Alisha N.	Finalize same for filing.	\$450	0.2									
	2/15/2019 Lapkewych, Alisha N.	Review defendant's Reply in support of its motion to strike class allegations and motion to dismiss.	\$450	1									
	2/19/2019 Lapkewych, Alisha N.	Confer with C. Healey regarding defendant's reply to motion to strike class allegations.	\$450	0.1									
	2/20/2019 Healey, Christopher J.	Analysis regarding risk of harm issue.	\$830	0.5									
	2/20/2019 Healey, Christopher J.	Review reply to motion to dismiss.	\$830	0.2									
	2/20/2019 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding CCL records.	\$830	0.2									
	2/20/2019 Healey, Christopher J.	Review DDS website regarding Sunrise facilities.	\$830	0.4									
	2/20/2019 Healey, Christopher J.	Outline complaint review summary.	\$830	0.7									
	2/20/2019 Healey, Christopher J.	Draft conference call agenda.	\$830	0.2									
	2/21/2019 Healey, Christopher J.	Office conference regarding DDS document review.	\$830	0.8									
	2/21/2019 Healey, Christopher J.	Prepare for Wallace meeting regarding class certification issues.	\$830	0.2									
	2/21/2019 Healey, Christopher J.	Prepare for call and conference call with team.	\$830	0.3					0.2		166.00		
	2/21/2019 Healey, Christopher J.	Correspondence regarding DDS records review.	\$830	0.2									
	2/21/2019 Healey, Christopher J.	Review draft summary of DDS records.	\$830	0.1									
	2/21/2019 Sykes, Cheryl E.	Analyze and review State Records to retrieve complaints for attorney regarding assisted living facilities in preparation for upcoming hearing.	\$195	1									
	2/25/2019 Healey, Christopher J.	Prepare for hearing.	\$830	0.5									
	2/25/2019 Healey, Christopher J.	Office conference regarding complaint investigation project.	\$830	0.2									
	2/25/2019 Lapkewych, Alisha N.	Analysis of reply to motion to strike.	\$450	1.4									
	2/25/2019 Lapkewych, Alisha N.	Conduct research regarding same.	\$450	2									
	2/25/2019 Sykes, Cheryl E.	Further analysis and review of State Records to retrieve complaints for attorney regarding assisted living facilities in preparation for upcoming hearing.	\$195	1									
	2/26/2019 Healey, Christopher J.	Prepare for March 1 hearing.	\$830	0.5									
	2/26/2019 Healey, Christopher J.	Review summary of DDS records.	\$830	0.2									
	2/26/2019 Healey, Christopher J.	Prepare for motion to dismiss hearing.	\$830	5.1									
	2/26/2019 Lapkewych, Alisha N.	Begin preparing motion to strike hearing outline.	\$450	0.2									
	2/27/2019 Healey, Christopher J.	Prepare for March 1 hearing.	\$830	0.2									
	2/27/2019 Healey, Christopher J.	Prepare correspondence to team regarding case status and rates issue.	\$830	0.1									
	2/27/2019 Healey, Christopher J.	Prepare for motion to dismiss argument.	\$830	2.5									
	2/27/2019 Healey, Christopher J.	Prepare correspondence to Brian Umpierre regarding hearing preparation.	\$830	0.1									
	2/27/2019 Healey, Christopher J.	Prepare for March 1 CMC hearing.	\$830	0.4									
	2/27/2019 Healey, Christopher J.	Prepare for motion to strike hearing.	\$830	4									
	2/27/2019 Lapkewych, Alisha N.	Continue preparing motion to strike hearing outline.	\$450	4.8									
	2/28/2019 Healey, Christopher J.	Prepare for motion to strike hearing.	\$830	0.5									
	2/28/2019 Healey, Christopher J.	Further preparation for motion to strike hearing.	\$830	0.8									
	2/28/2019 Healey, Christopher J.	Telephone conference with Attorney Colby regarding oral argument.	\$830	0.2									
	2/28/2019 Healey, Christopher J.	Prepare for Stebner call and telephone conference with Attorney Stebner regarding status.	\$830	0.1									
	2/28/2019 Healey, Christopher J.	Review court order regarding hearing and case management conference.	\$830	0.1									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	2/28/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.1		\$83.00									
	2/28/2019 Healey, Christopher J.	Correspondence regarding follow-up legal issues and pleading challenges.	\$830	0.2		\$166.00									
	2/28/2019 Healey, Christopher J.	Analysis regarding putative class member discovery.	\$830	0.3		\$249.00									
	2/28/2019 Healey, Christopher J.	Follow-up correspondence regarding amended complaint.	\$830	0.2		\$166.00									
	2/28/2019 Lapkewych, Alisha N.	Confer with C. Healey regarding hearing on motion to strike.	\$450	0.3		\$135.00									
	2/28/2019 Lapkewych, Alisha N.	Conduct follow up research regarding same.	\$450	0.8		\$360.00									
	3/1/2019 Healey, Christopher J.	Review background information regarding CCL records.	\$830	0.5		\$415.00									
	3/1/2019 Healey, Christopher J.	Prepare correspondence to team regarding DDS file review.	\$830	0.1		\$83.00									
	3/1/2019 Healey, Christopher J.	Follow-up correspondence and telephone conferences regarding same.	\$830	0.1		\$83.00									
	3/1/2019 Healey, Christopher J.	Prepare correspondence regarding investigator and follow-up issues.	\$830	0.1		\$83.00									
	3/1/2019 Healey, Christopher J.	Telephone conference with Attorney Yarnell regarding amended complaint.	\$830	0.2		\$166.00									
	3/1/2019 Valero, Carmen A.	Research Sunrise as defendant in CA litigation, for C. Healey.	\$360	0.5		\$180.00									
	3/4/2019 Healey, Christopher J.	Review litigation searches.	\$830	0.3		\$249.00									
	3/4/2019 Healey, Christopher J.	Correspondence regarding same.	\$830	0.3		\$249.00									
	3/4/2019 Healey, Christopher J.	Draft to-do list.	\$830	0.3		\$249.00									
	3/4/2019 Healey, Christopher J.	Review court order denying Defendants' pleading challenges.	\$830	0.2		\$166.00									
	3/4/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.2		\$166.00									
	3/4/2019 Healey, Christopher J.	Prepare correspondence to Attorney Yarnell regarding DDS website review.	\$830	0.2		\$166.00									
	3/4/2019 Healey, Christopher J.	Outline class argument and discovery requests.	\$830	0.3		\$249.00									
	3/4/2019 Healey, Christopher J.	Review appellate procedure regarding motion to dismiss.	\$830	0.1		\$83.00									
	3/4/2019 Menshikova, Anastasiya	Review and analyze Court ruling denying MTD.	\$415	1.6		\$664.00	0.6	249.00							
	3/4/2019 Lapkewych, Alisha N.	Review order denying motion to dismiss and strike.	\$450	0.2		\$90.00									
	3/5/2019 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding document requests.	\$830	0.2		\$166.00									
	3/5/2019 Healey, Christopher J.	Office conference regarding same.	\$830	0.1		\$83.00									
	3/5/2019 Healey, Christopher J.	Prepare correspondence to team regarding discovery requests.	\$830	0.1		\$83.00									
	3/5/2019 Healey, Christopher J.	Outline written discovery requests.	\$830	1.5		\$1,245.00									
	3/6/2019 Healey, Christopher J.	Conference with Attorney Thamer regarding document requests.	\$830	0.1		\$83.00									
	3/6/2019 Healey, Christopher J.	Review documents.	\$830	0.1		\$83.00									
	3/6/2019 Healey, Christopher J.	Revise spreadsheet task list.	\$830	0.1		\$83.00									
	3/6/2019 Healey, Christopher J.	Prepare correspondence to team regarding conference call and prepare correspondence to Attorney Stebner regarding global to-do.	\$830	0.1		\$83.00									
	3/6/2019 Healey, Christopher J.	Review draft discovery requests.	\$830	0.3		\$249.00									
	3/6/2019 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding same.	\$830	0.2		\$166.00									
	3/6/2019 Healey, Christopher J.	Correspondence regarding DSS citations.	\$830	0.2		\$166.00									
	3/6/2019 Healey, Christopher J.	Revise interrogatories.	\$830	0.8		\$664.00									
	3/7/2019 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding status and tactics.	\$830	0.1		\$83.00									
	3/7/2019 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Fee Sharing Agreement.	\$830	0.1		\$83.00									
	3/7/2019 Healey, Christopher J.	Review research regarding risk of harm issues and revise to-do spreadsheet.	\$830	0.1		\$83.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>	<u>Fees</u>	<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>		
	3/7/2019 Healey, Christopher J.	Prepare for conference call and telephone conference with Attorney Stebner regarding Fee Sharing Agreement.	\$830	0.1	\$83.00										
	3/7/2019 Healey, Christopher J.	Draft initial discovery requests.	\$830	1.2	\$996.00										
	3/7/2019 Healey, Christopher J.	Office conference regarding same.	\$830	0.2	\$166.00										
	3/7/2019 Healey, Christopher J.	Conference call with team.	\$830	0.1	\$83.00						0.1	83.00			
	3/7/2019 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding hourly rates issues and follow-up correspondence regarding same.	\$830	0.1	\$83.00										
	3/7/2019 Healey, Christopher J.	Review Attorney Marks' changes to Fee Agreement.	\$830	0.1	\$83.00										
	3/7/2019 Healey, Christopher J.	Telephone conference regarding former employee call.	\$830	0.1	\$83.00										
	3/7/2019 Healey, Christopher J.	Follow-up correspondence regarding same.	\$830	0.1	\$83.00										
	3/7/2019 Healey, Christopher J.	Prepare deposition notices.	\$830	0.2	\$166.00										
	3/7/2019 Healey, Christopher J.	Prepare exhibit regarding DDS citation and correspondence regarding same.	\$830	0.3	\$249.00										
	3/7/2019 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding former employee interview.	\$830	0.2	\$166.00										
	3/7/2019 Healey, Christopher J.	Prepare correspondence to file regarding same.	\$830	0.1	\$83.00										
	3/8/2019 Healey, Christopher J.	Correspondence with Attorney Marks regarding document requests.	\$830	0.2	\$166.00										
	3/8/2019 Healey, Christopher J.	Revise draft discovery.	\$830	0.9	\$747.00										
	3/8/2019 Healey, Christopher J.	Review background documents regarding Sunrise operations.	\$830	4	\$3,320.00										
	3/9/2019 Healey, Christopher J.	Revise request for production of documents.	\$830	2.9	\$2,407.00			1	830.00						
	3/9/2019 Healey, Christopher J.	Review proposed request for production of documents from Attorney Marks.	\$830	1.5	\$1,245.00										
	3/9/2019 Healey, Christopher J.	Prepare correspondence regarding Attorney Mark's draft requests.	\$830	0.2	\$166.00										
	3/10/2019 Healey, Christopher J.	Review background materials.	\$830	0.7	\$1,411.00										
	3/10/2019 Healey, Christopher J.	Revise request for production of documents (first set).	\$830	1.7	\$1,411.00										
	3/10/2019 Healey, Christopher J.	Review Health and Safety Code statutory scheme for RCFEs.	\$830	0.5	\$415.00										
	3/11/2019 Healey, Christopher J.	Office conference with Attorney Bird regarding Defendants' offset argument.	\$830	0.1	\$83.00										
	3/11/2019 Healey, Christopher J.	Revise requests for production of documents.	\$830	2.5	\$2,075.00			1	830.00						
	3/12/2019 Healey, Christopher J.	Revise requests for production of documents.	\$830	3	\$2,490.00			1	830.00						
	3/12/2019 Healey, Christopher J.	Prepare correspondence to team regarding draft request for production of documents.	\$830	0.2	\$2,490.00										
	3/13/2019 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding discovery issues, outline issues for Attorney Marks' call, correspondence with Attorney Marks regarding discovery analysis.	\$830	0.1	\$83.00										
	3/13/2019 Healey, Christopher J.	Follow-up correspondence with Attorney Marks regarding data issues.	\$830	0.1	\$83.00										
	3/13/2019 Healey, Christopher J.	Follow-up correspondence with Attorney Umpierre regarding same.	\$830	0.1	\$83.00										
	3/13/2019 Healey, Christopher J.	Telephone conference with Attorney Marks regarding discovery/data issues.	\$830	0.1	\$83.00										
	3/13/2019 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding assessment documents.	\$830	0.2	\$166.00										
	3/13/2019 Healey, Christopher J.	Correspondence regarding witness interviews.	\$830	0.1	\$83.00										
	3/13/2019 Menshikova, Anastasiya	Review notes regarding call with Imogene Cortez.	\$415	1.1	\$456.50										
	3/14/2019 Healey, Christopher J.	Review and revise Fee Agreement.	\$830	0.1	\$83.00										
	3/14/2019 Healey, Christopher J.	Prepare correspondence to Marks firm regarding same.	\$830	0.1	\$83.00										

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	3/14/2019 Healey, Christopher J.	Review and add hourly rate to Fee Agreement.	\$830	0.1									
	3/14/2019 Healey, Christopher J.	Prepare for team call.	\$830	0.1									
	3/14/2019 Healey, Christopher J.	Conference call with team and follow-up correspondence on to-do issues.	\$830	0.3					0.3		249.00		
	3/14/2019 Healey, Christopher J.	Revise request for production of documents.	\$830	0.7									
	3/15/2019 Healey, Christopher J.	Revise Fee Sharing Agreement.	\$830	0.1									
	3/15/2019 Healey, Christopher J.	Correspondence regarding rates.	\$830	0.1									
	3/15/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.1									
	3/18/2019 Healey, Christopher J.	Review Attorney Marks' changes to request for production of documents.	\$830	0.1									
	3/18/2019 Healey, Christopher J.	Revise request for production of documents.	\$830	2									\$1,660.00
	3/18/2019 Healey, Christopher J.	Review and revise interrogatories.	\$830	0.3									\$249.00
	3/18/2019 Healey, Christopher J.	Review and revise DSS exhibit.	\$830	0.2									\$166.00
	3/19/2019 Healey, Christopher J.	Review answer and affirmative defenses.	\$830	0.2									\$166.00
	3/19/2019 Healey, Christopher J.	Prepare correspondence regarding Sunrise Management.	\$830	0.1									\$83.00
	3/19/2019 Healey, Christopher J.	Revise discovery and cover letter regarding same.	\$830	1.2									\$996.00
	3/20/2019 Healey, Christopher J.	Telephone conference with Attorney Marks regarding staffing model issues.	\$830	0.1									\$83.00
	3/20/2019 Healey, Christopher J.	Follow-up correspondence regarding same.	\$830	0.1									\$83.00
	3/20/2019 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding class certification issues.	\$830	0.1									\$83.00
	3/20/2019 Healey, Christopher J.	Review analysis regarding offset arguments.	\$830	0.2									\$166.00
	3/21/2019 Healey, Christopher J.	Analysis regarding set-off defense.	\$830	0.1									\$83.00
	3/21/2019 Lapkewych, Alisha N.	Conduct research regarding whether to amend complaint to add Management Inc. entity as a defendant.	\$450	1.5									\$675.00
	3/22/2019 Healey, Christopher J.	Review defendants' discovery letter.	\$830	0.1									\$83.00
	3/22/2019 Healey, Christopher J.	Fly to Oakland for class meeting and fly to San Diego from Oakland following class meeting.	\$830	1									\$830.00
	3/22/2019 Healey, Christopher J.	Meet with Attorney Wallace regarding class certification motions.	\$830	0.5									\$415.00
	3/22/2019 Lapkewych, Alisha N.	Continue conducting research regarding whether to add Management Inc. entity as defendant.	\$450	0.8									\$360.00
	3/22/2019 Valero, Carmen A.	Research corporate relationship between two Sunrise entities, for A. Lapkewych.	\$360	1									\$360.00
	3/25/2019 Healey, Christopher J.	Correspondence regarding discovery conference.	\$830	0.2									\$166.00
	3/25/2019 Healey, Christopher J.	Review memorandum regarding Management as defendant.	\$830	0.2									\$166.00
	3/25/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.2									\$166.00
	3/25/2019 Healey, Christopher J.	Research regarding same.	\$830	0.1									\$83.00
	3/25/2019 Lapkewych, Alisha N.	Conduct research regarding amending complaint to add Sunrise Management.	\$450	1.5									\$675.00
	3/25/2019 Lapkewych, Alisha N.	Begin drafting same.	\$450	1.5									\$675.00
	3/26/2019 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding case status.	\$830	0.1									\$83.00
	3/26/2019 Healey, Christopher J.	Telephone messages from reporter.	\$830	0.1									\$83.00
	3/26/2019 Healey, Christopher J.	Correspondence regarding discovery conference.	\$830	0.1									\$83.00
	3/26/2019 Healey, Christopher J.	Prepare for discovery conference.	\$830	1.1									\$913.00
	3/26/2019 Healey, Christopher J.	Telephone conference with Attorney Needham regarding complaint amendment.	\$830	0.1									\$83.00

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	3/26/2019 Healey, Christopher J.	Prepare correspondence regarding CCL records on management arrangement.	\$830	0.1									
	3/26/2019 Healey, Christopher J.	Office conference with Attorney Lapkewych regarding amendment issue.	\$830	0.1									
	3/26/2019 Healey, Christopher J.	Further preparation for discovery conference.	\$830	0.2									
	3/26/2019 Lapkewych, Alisha N.	Continue conducting research regarding amending complaint to add Sunrise Management.	\$450	1.1									
	3/27/2019 Healey, Christopher J.	Prepare for discovery conference.	\$830	1									
	3/27/2019 Healey, Christopher J.	Correspondence regarding potential amendment regarding Sunrise Management.	\$830	0.2									
	3/27/2019 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery conference.	\$830	0.3									
	3/27/2019 Healey, Christopher J.	Telephone conference with Attorney Gibson regarding discovery conference.	\$830	0.2									
	3/27/2019 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding amended Rule 26 Report.	\$830	0.3									
	3/27/2019 Healey, Christopher J.	Research regarding opposing counsel class certification experience.	\$830	0.2									
	3/27/2019 Healey, Christopher J.	Prepare correspondence to Ms. Valero regarding follow-up research.	\$830	0.1									
	3/27/2019 Healey, Christopher J.	Correspondence with Attorney Needham regarding prior staffing lawsuit against Sunrise.	\$830	0.1									
	3/27/2019 Lapkewych, Alisha N.	Continue conducting research and drafting amended complaint.	\$450	2.4									
	3/27/2019 Valero, Carmen A.	Research decisions by Mag. Judge Early on discovery issues, and research class cert decision by opposing counsel, for C. Healey.	\$360	0.9									
	3/28/2019 Healey, Christopher J.	Revise draft declaration for putative class member and correspondence with Attorney Wallace regarding same.	\$830	0.1									
	3/28/2019 Healey, Christopher J.	Correspondence regarding adding Management as defendant.	\$830	0.1									
	3/28/2019 Healey, Christopher J.	Telephone conference with Attorney Needham regarding same.	\$830	0.2									
	3/28/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.2									
	3/28/2019 Healey, Christopher J.	Further telephone conference with Attorney Needham regarding analysis on amendment.	\$830	0.2									
	3/28/2019 Healey, Christopher J.	Revise Rule 26(f) report.	\$830	1.9									
	3/28/2019 Healey, Christopher J.	Correspondence to team regarding same.	\$830	0.1									
	3/28/2019 Lapkewych, Alisha N.	Continue conducting research and drafting amended complaint to add Sunrise Management as a defendant.	\$450	0.9									
	3/29/2019 Healey, Christopher J.	Review background regarding Magistrate Judge Early.	\$830	0.3									
	4/2/2019 Healey, Christopher J.	Analysis regarding class certification defense arguments regarding offset and damages.	\$830	0.9									
	4/3/2019 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding open discovery and related tasks.	\$830	0.1									
	4/3/2019 Healey, Christopher J.	Outline responses to Defendant's class certification arguments.	\$830	0.7									
	4/3/2019 Healey, Christopher J.	Prepare correspondence to defense counsel regarding amended report.	\$830	0.1									
	4/4/2019 Healey, Christopher J.	Review Defendant's inserts to joint statement.	\$830	0.1									
	4/4/2019 Healey, Christopher J.	Draft revisions to joint statement.	\$830	2.3									
	4/4/2019 Healey, Christopher J.	Correspondence regarding same.	\$830	0.2									
	4/4/2019 Healey, Christopher J.	Prepare for conference call.	\$830	0.1									
	4/4/2019 Healey, Christopher J.	Conference call with team.	\$830	0.2						0.2	166.00		

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>							
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>	<u>Fees</u>		
							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	4/4/2019 Healey, Christopher J.	Follow-up correspondence regarding to-do items.	\$830	0.1		\$83.00								
	4/4/2019 Healey, Christopher J.	Review amended report and Exhibit A.	\$830	0.7		\$581.00								
	4/4/2019 Healey, Christopher J.	Prepare correspondence to defense counsel regarding same.	\$830	0.1		\$83.00								
	4/4/2019 Lapkewych, Alisha N.	Review correspondence and documents regarding amending complaint to add Sunrise Management.	\$450	0.2		\$90.00								
	4/5/2019 Healey, Christopher J.	Analysis regarding potential amendment to include new plaintiff.	\$830	0.8		\$664.00								
	4/5/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.4		\$332.00								
	4/5/2019 Healey, Christopher J.	Follow-up correspondence regarding same.	\$830	0.1		\$83.00								
	4/5/2019 Healey, Christopher J.	Review Defendant's changes to joint status report.	\$830	0.3		\$249.00								
	4/5/2019 Healey, Christopher J.	Revise joint report.	\$830	0.5		\$415.00								
	4/5/2019 Healey, Christopher J.	Correspondence with defense counsel regarding same.	\$830	0.2		\$166.00								
	4/5/2019 Healey, Christopher J.	Follow-up correspondence regarding status report.	\$830	0.2		\$166.00								
	4/6/2019 Healey, Christopher J.	Outline class certification analysis.	\$830	0.2		\$166.00								
	4/8/2019 Healey, Christopher J.	Draft analysis regarding key defense arguments affecting class certification issues.	\$830	1.1		\$913.00								
	4/8/2019 Lapkewych, Alisha N.	Review correspondence related to amending complaint to add Sunrise Management as defendant.	\$450	0.2		\$90.00								
	4/9/2019 Healey, Christopher J.	Correspondence regarding plaintiffs' initial disclosure.	\$830	0.2		\$166.00								
	4/9/2019 Healey, Christopher J.	Review initial disclosures.	\$830	0.4		\$332.00								
	4/9/2019 Healey, Christopher J.	Correspondence to Attorney Umpierre regarding same.	\$830	0.1		\$83.00								
	4/9/2019 Healey, Christopher J.	Draft analysis regarding class certification issues.	\$830	0.8		\$664.00								
	4/10/2019 Healey, Christopher J.	Correspondence regarding team call.	\$830	0.1		\$83.00								
	4/10/2019 Healey, Christopher J.	Analysis regarding class certification issues.	\$830	0.6		\$498.00								
	4/11/2019 Healey, Christopher J.	Prepare correspondence regarding team call.	\$830	0.1		\$83.00								
	4/11/2019 Healey, Christopher J.	Office conference regarding Sarah Colby arrangement.	\$830	0.1		\$83.00								
	4/11/2019 Healey, Christopher J.	Draft analysis regarding class certification issues.	\$830	0.4		\$332.00								
	4/11/2019 Healey, Christopher J.	Review correspondence regarding defendant's initial disclosures.	\$830	0.1		\$83.00								
	4/11/2019 Healey, Christopher J.	Prepare correspondence regarding follow-up document request regarding same.	\$830	0.1		\$83.00								
	4/12/2019 Healey, Christopher J.	Correspondence regarding Sunrise Living status.	\$830	0.2		\$166.00								
	4/12/2019 Healey, Christopher J.	Review Miconi complaint.	\$830	0.3		\$249.00								
	4/12/2019 Healey, Christopher J.	Correspondence with Attorney Needham regarding same.	\$830	0.2		\$166.00								
	4/12/2019 Healey, Christopher J.	Draft analysis regarding class certification issues.	\$830	0.6		\$498.00								
	4/15/2019 Healey, Christopher J.	Analysis regarding class restitution and related issues.	\$830	1.6		\$1,328.00								
	4/15/2019 Lapkewych, Alisha N.	Draft motion to amend complaint.	\$450	0.3		\$135.00								
	4/16/2019 Healey, Christopher J.	Analysis regarding class damage arguments.	\$830	0.4		\$332.00								
	4/16/2019 Healey, Christopher J.	Correspondence regarding potential amendment to name Sunrise management.	\$830	0.1		\$83.00								
	4/16/2019 Healey, Christopher J.	Telephone conference with Attorney Colby regarding amendment.	\$830	0.3		\$249.00								
	4/16/2019 Healey, Christopher J.	Research regarding oral representation/reliance issues.	\$830	0.5		\$415.00								
	4/16/2019 Healey, Christopher J.	Prepare correspondence to team regarding conference call agenda.	\$830	0.2		\$166.00								
	4/16/2019 Lapkewych, Alisha N.	Continue drafting motion to amend complaint.	\$450	0.2		\$90.00								
	4/17/2019 Healey, Christopher J.	Review court orders regarding case scheduling.	\$830	0.2		\$166.00								
	4/17/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.2		\$166.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>
							<u>Hrs</u>		<u>Hrs</u>		<u>Hrs</u>	
	4/17/2019 Healey, Christopher J.	Revise analysis memorandum regarding class certification issues.	\$830	0.1		\$83.00						
	4/17/2019 Healey, Christopher J.	Revise analysis regarding class certification and damage issues.	\$830	0.6		\$498.00						
	4/17/2019 Lapkewych, Alisha N.	Continue drafting motion to amend complaint.	\$450	0.9		\$405.00						
	4/18/2019 Healey, Christopher J.	Prepare for team call.	\$830	0.1		\$83.00						
	4/18/2019 Healey, Christopher J.	Conference call with team regarding status and tactics.	\$830	0.2		\$166.00		0.2		166.00		
	4/18/2019 Healey, Christopher J.	Follow-up correspondence and to-do lists.	\$830	0.1		\$83.00						
	4/18/2019 Healey, Christopher J.	Office conference regarding document issues.	\$830	0.1		\$83.00						
	4/19/2019 Healey, Christopher J.	Prepare correspondence regarding Fee Sharing Agreement.	\$830	0.1		\$83.00						
	4/19/2019 Healey, Christopher J.	Prepare memorandum regarding settlement response and case analysis.	\$830	0.2		\$166.00						
	4/22/2019 Healey, Christopher J.	Analysis regarding expert approach on restitution model, telephone conference to Kennedy's office regarding same.	\$830	0.1		\$83.00						
	4/22/2019 Healey, Christopher J.	Meet with Mr. Mansfield regarding damage model.	\$830	0.6		\$498.00						
	4/22/2019 Lapkewych, Alisha N.	Draft motion to amend first amended complaint.	\$450	0.8		\$360.00						
	4/23/2019 Healey, Christopher J.	Revise discovery request.	\$830	0.1		\$83.00						
	4/23/2019 Lapkewych, Alisha N.	Continue drafting motion to amend first amended complaint.	\$450	2.1		\$945.00						
	4/24/2019 Healey, Christopher J.	Research regarding reliance issues.	\$830	0.4		\$332.00						
	4/24/2019 Healey, Christopher J.	Review Lamps Plus decision.	\$830	0.2		\$166.00						
	4/24/2019 Healey, Christopher J.	Prepare correspondence to team regarding status and arbitration arguments.	\$830	0.1		\$83.00						
	4/25/2019 Healey, Christopher J.	Outline to-do items.	\$830	0.1		\$83.00						
	4/25/2019 Healey, Christopher J.	Prepare correspondence to team regarding to-do issues.	\$830	0.1		\$83.00						
	4/25/2019 Healey, Christopher J.	Prepare for meeting with Economic expert, Pat Kennedy.	\$830	0.1		\$83.00						
	4/26/2019 Healey, Christopher J.	Prepare for Pat Kennedy meeting.	\$830	0.2		\$166.00						
	4/26/2019 Healey, Christopher J.	Meet with Pat Kennedy regarding economic analysis and approach.	\$830	0.2		\$166.00						
	4/26/2019 Healey, Christopher J.	Correspondence with Attorney Wallace regarding same.	\$830	0.1		\$83.00						
	4/26/2019 Healey, Christopher J.	Review court ADR order.	\$830	0.2		\$166.00						
	4/26/2019 Healey, Christopher J.	Prepare correspondence to defense counsel regarding same.	\$830	0.2		\$166.00						
	4/26/2019 Healey, Christopher J.	Follow-up correspondence to Attorney Marks regarding staffing analysis.	\$830	0.1		\$83.00						
	4/26/2019 Lapkewych, Alisha N.	Continue drafting motion to amend first amended complaint.	\$450	1.1		\$495.00						
	4/28/2019 Healey, Christopher J.	Research regarding Reliance issues.	\$830	0.2		\$166.00						
	4/28/2019 Healey, Christopher J.	Prepare correspondence regarding potential Reliance argument.	\$830	0.1		\$83.00						
	4/29/2019 Healey, Christopher J.	Office conference regarding CCL subpoenas.	\$830	0.1		\$83.00						
	5/1/2019 Healey, Christopher J.	Office conference regarding discovery and tactics.	\$830	0.3		\$249.00						
	5/2/2019 Healey, Christopher J.	Correspondence with defense counsel regarding mediation options.	\$830	0.2		\$166.00						
	5/2/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.2		\$166.00						
	5/2/2019 Healey, Christopher J.	Prepare correspondence regarding team call.	\$830	0.1		\$83.00						
	5/2/2019 Healey, Christopher J.	Prepare to-do list.	\$830	0.1		\$83.00						
	5/2/2019 Healey, Christopher J.	Research and analysis regarding reliance issues.	\$830	0.1		\$83.00						
	5/2/2019 Healey, Christopher J.	Continue research and analysis regarding reliance issues.	\$830	1.1		\$913.00						
	5/3/2019 Healey, Christopher J.	Prepare correspondence to defense counsel regarding ADR option.	\$830	0.1		\$83.00						
	5/3/2019 Healey, Christopher J.	Correspondence with Attorney Stebner regarding ADR options.	\$830	0.1		\$83.00						
	5/3/2019 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery status.	\$830	0.1		\$83.00						

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	5/6/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding status.	\$745	0.2									
	5/6/2019 Cocchia, Robert A.	Review case materials.	\$745	1.1									
	5/6/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding case status and discovery.	\$830	0.2	\$166.00								
	5/6/2019 Healey, Christopher J.	Correspondence regarding same.	\$830	0.3	\$249.00								
	5/7/2019 Healey, Christopher J.	Review draft ADR statement.	\$830	0.1	\$83.00								
	5/7/2019 Healey, Christopher J.	Prepare correspondence regarding ADR report.	\$830	0.1	\$83.00								
	5/7/2019 Healey, Christopher J.	Correspondence with Attorney Gibson regarding same.	\$830	0.1	\$83.00								
	5/7/2019 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding status.	\$830	0.1	\$83.00								
	5/8/2019 Healey, Christopher J.	Prepare correspondence to team regarding to do issues and status.	\$830	0.2	\$166.00								
	5/8/2019 Healey, Christopher J.	Outline agenda for 5/14 meeting regarding staffing experts.	\$830	0.2	\$166.00								
	5/9/2019 Healey, Christopher J.	Correspondence regarding arbitration issues and Uber Technologies case.	\$830	0.1	\$83.00								
	5/9/2019 Healey, Christopher J.	Follow-up regarding same.	\$830	0.1	\$83.00								
	5/9/2019 Healey, Christopher J.	Research regarding potential RICO claim.	\$830	1	\$830.00								
	5/9/2019 Healey, Christopher J.	Prepare correspondence regarding arbitration issues and Uber ruling.	\$830	0.1	\$83.00								
	5/9/2019 Healey, Christopher J.	Prepare correspondence to defense counsel regarding discovery meet and confer and office conference with Attorney Cocchia regarding same.	\$830	0.1	\$83.00								
	5/9/2019 Healey, Christopher J.	Review Defendant's discovery responses.	\$830	0.3	\$249.00								
	5/9/2019 Healey, Christopher J.	Research regarding objection.	\$830	0.3	\$249.00								
	5/10/2019 Cocchia, Robert A.	Review and analyze materials forwarded by Attorney Healey regarding discovery disputes, pleading challenges and prior legal research.	\$745	3.5	\$2,607.50								
	5/10/2019 Healey, Christopher J.	Outline meet and confer letter re first request for production of documents/interrogatories.	\$830	0.2	\$166.00								
	5/10/2019 Healey, Christopher J.	Correspondence regarding discovery meet and confer.	\$830	0.2	\$166.00								
	5/10/2019 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery meet and confer letter.	\$830	0.2	\$166.00								
	5/13/2019 Cocchia, Robert A.	Review discovery documents in preparation for meet and confer conference with defendants.	\$745	1.2	\$894.00								
	5/13/2019 Healey, Christopher J.	Correspondence regarding discovery meet and confer.	\$830	0.1	\$83.00								
	5/13/2019 Healey, Christopher J.	Research and analysis regarding class discovery rules.	\$830	0.5	\$415.00								
	5/14/2019 Healey, Christopher J.	Review Defendants' discovery objections and responses.	\$830	1.5	\$1,245.00								
	5/15/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding strategy for discovery meet and confer with defendant's counsel.	\$745	0.6	\$447.00								
	5/15/2019 Cocchia, Robert A.	Analysis of HIPPA issues.	\$745	0.4	\$298.00								
	5/15/2019 Cocchia, Robert A.	Analysis of case law on class discovery issues.	\$745	0.5	\$372.50								
	5/15/2019 Healey, Christopher J.	Meet with Attorney Cocchia regarding discovery meet and confer.	\$830	0.9	\$747.00								
	5/15/2019 Healey, Christopher J.	Review draft meet and confer letter.	\$830	0.3	\$249.00								
	5/15/2019 Healey, Christopher J.	Follow-up correspondence regarding HIPPA.	\$830	0.2	\$166.00								
	5/15/2019 Healey, Christopher J.	Prepare for meet and confer call.	\$830	0.2	\$166.00								
	5/16/2019 Healey, Christopher J.	Correspondence with Attorney Needham regarding potential RICO claim.	\$830	0.1	\$83.00								
	5/16/2019 Healey, Christopher J.	Prepare for meet and confer.	\$830	0.1	\$83.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	5/16/2019 Healey, Christopher J.	Telephone conference with Attorney Friedman regarding potential RICO claim.	\$830	0.2		\$166.00								
	5/16/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.3		\$249.00								
	5/17/2019 Cocchia, Robert A.	Prepare for and attend telephonic meet and confer conference with Sunrise's counsel regarding Sunrise's responses to written discovery.	\$745	1.4		\$1,043.00								
	5/17/2019 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding potential new claims and status.	\$830	0.2		\$166.00								
	5/17/2019 Healey, Christopher J.	Prepare for discovery meet and confer call.	\$830	0.3		\$249.00								
	5/17/2019 Healey, Christopher J.	Participate in discovery meet and confer call with defense counsel.	\$830	1		\$830.00								
	5/17/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery to-do issues.	\$830	0.5		\$415.00								
	5/20/2019 Healey, Christopher J.	Outline inserts to meet and confer letter.	\$830	0.3		\$249.00								
	5/20/2019 Healey, Christopher J.	Revise meet and confer letter	\$830	2.5		\$2,075.00								
	5/20/2019 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$830	0.1		\$83.00								
	5/21/2019 Healey, Christopher J.	Correspondence regarding mediation candidates.	\$830	0.1		\$83.00								
	5/21/2019 Healey, Christopher J.	Revise meet and confer letter.	\$830	0.5		\$415.00								
	5/21/2019 Healey, Christopher J.	Correspondence with team regarding same.	\$830	0.2		\$166.00								
	5/21/2019 Healey, Christopher J.	Review and comment regarding draft Protective Order	\$830	0.6		\$498.00								
	5/21/2019 Healey, Christopher J.	Analysis regarding same.	\$830	0.2		\$166.00								
	5/22/2019 Cocchia, Robert A.	Legal research regarding privacy rights and identification of witnesses for meet and confer with Sunrise on discovery responses.	\$745	1.5		\$1,117.50								
	5/22/2019 Healey, Christopher J.	Prepare correspondence to team regarding conference call and agenda.	\$830	0.1		\$83.00								
	5/22/2019 Healey, Christopher J.	Telephone conference with Patrick Kennedy regarding damage analysis.	\$830	0.1		\$83.00								
	5/22/2019 Healey, Christopher J.	Office conference regarding discovery letter.	\$830	0.2		\$166.00								
	5/23/2019 Healey, Christopher J.	Research regarding HCP, Inc.	\$830	0.1		\$83.00								
	5/23/2019 Healey, Christopher J.	Telephone conference with Attorney Needham regarding background research into HCP public filings.	\$830	0.1		\$83.00								
	5/23/2019 Healey, Christopher J.	Prepare correspondence regarding same.	\$830	0.1		\$83.00								
	5/23/2019 Healey, Christopher J.	Correspondence regarding mediation.	\$830	0.3		\$249.00								
	5/24/2019 Cocchia, Robert A.	Revise draft meet and confer correspondence.	\$745	1.3		\$968.50								
	5/24/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding same.	\$745	0.2		\$149.00								
	5/24/2019 Healey, Christopher J.	Conference with Attorney Cocchia regarding discovery meet and confer.	\$830	0.2		\$166.00								
	5/24/2019 Healey, Christopher J.	Revise protective order	\$830	0.1		\$83.00								
	5/24/2019 Healey, Christopher J.	Prepare for conference call and conference call with team members.	\$830	0.4		\$332.00			0.4	332.00				
	5/30/2019 Cocchia, Robert A.	Research joint stipulations in Central District for discovery disputes.	\$745	1		\$745.00								
	5/30/2019 Cocchia, Robert A.	Analysis of local rules and chamber rules for Magistrate Early regarding discovery disputes.	\$745	0.4		\$298.00								
	5/30/2019 Cocchia, Robert A.	Continue drafting meet and confer correspondence regarding Defendant's response to interrogatories and request for production, set one.	\$745	2.7		\$2,011.50								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	5/30/2019 Myrick, Tracy R.	Download client production and provide caseteam with link to location.	\$195	0.5	\$97.50								
	5/31/2019 Cocchia, Robert A.	Draft meet and confer correspondence to Defendant regarding responses to Plaintiff's Request for Production and Special Interrogatories, Set 1 and legal research regarding same.	\$745	4.6	\$3,427.00								
	6/3/2019 Cocchia, Robert A.	Revise draft meet and confer letter to defendant's counsel regarding responses to written discovery.	\$745	1.7	\$1,266.50								
	6/3/2019 Cocchia, Robert A.	Review and exchange e-mail messages with Attorney Healey regarding same.	\$745	0.2	\$149.00								
	6/3/2019 Healey, Christopher J.	Telephone message for Attorney Maryott regarding mediation timing.	\$830	0.1	\$83.00								
	6/3/2019 Healey, Christopher J.	Office conferences with Attorney Cocchia regarding meet and confer letter.	\$830	0.2	\$166.00								
	6/3/2019 Healey, Christopher J.	Review draft meet and confer letter.	\$830	0.2	\$166.00								
	6/3/2019 Healey, Christopher J.	Telephone conference with Attorney Maryott regarding mediation issues.	\$830	0.3	\$249.00								
	6/3/2019 Healey, Christopher J.	Review and revise meet and confer letter.	\$830	1.3	\$1,079.00								
	6/3/2019 Healey, Christopher J.	Correspondence with mediator Kaplan's office.	\$830	0.2	\$166.00								
	6/3/2019 Healey, Christopher J.	Correspondence regarding mediation.	\$830	0.2	\$166.00								
	6/4/2019 Cocchia, Robert A.	Revise and finalize meet and confer regarding Defendant's responses to interrogatories and request for production set one.	\$745	2.1	\$1,564.50								
	6/4/2019 Cocchia, Robert A.	Legal research regarding same.	\$745	1	\$745.00								
	6/4/2019 Cocchia, Robert A.	Revise draft protective order.	\$745	1									
	6/4/2019 Healey, Christopher J.	Correspondence regarding discovery issues.	\$830	0.2	\$166.00								
	6/5/2019 Healey, Christopher J.	Draft to-do list.	\$830	0.2	\$166.00								
	6/5/2019 Healey, Christopher J.	Prepare correspondence regarding mediation issue.	\$830	0.1	\$83.00								
	6/5/2019 Healey, Christopher J.	Follow-up correspondence to Attorney Kaplan's office.	\$830	0.1	\$83.00								
	6/5/2019 Healey, Christopher J.	Prepare correspondence regarding amended complaint.	\$830	0.1	\$83.00								
	6/6/2019 Cocchia, Robert A.	Prepare and transmit redline draft protective order to defendant's counsel.	\$745	0.8	\$596.00								
	6/6/2019 Healey, Christopher J.	Correspondence regarding amended complaint.	\$830	0.1	\$83.00								
	6/7/2019 Healey, Christopher J.	Correspondence regarding amended complaint and possible prayer for injunctive relief.	\$830	0.2	\$166.00								
	6/7/2019 Healey, Christopher J.	Prepare correspondence regarding meet and confer regarding amended complaint.	\$830	0.1	\$83.00								
	6/7/2019 Healey, Christopher J.	Telephone conference with team regarding case status, discovery and tactics.	\$830	0.3	\$249.00			0.3	249.00				
	6/7/2019 Healey, Christopher J.	Follow-up correspondence regarding same.	\$830	0.1	\$83.00								
	6/7/2019 Healey, Christopher J.	Correspondence regarding employment decision.	\$830	0.3	\$249.00								
	6/7/2019 Healey, Christopher J.	Analysis regarding same.	\$830	0.3	\$249.00								
	6/7/2019 Healey, Christopher J.	Follow-up correspondence regarding same.	\$830	0.2	\$166.00								
	6/10/2019 Cocchia, Robert A.	Review and exchange e-mails regarding amended complaint and case status.	\$745	0.4	\$298.00								
	6/10/2019 Cocchia, Robert A.	Research AEO designations for protective orders and limitations for same.	\$745	2	\$1,490.00								
	6/10/2019 Cocchia, Robert A.	Review materials and docket from employment class action against Sunrise.	\$745	1.3	\$968.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	6/10/2019 Healey, Christopher J.	Correspondence regarding amended complaint and Shiferaw case.	\$830	0.5		\$415.00									
	6/10/2019 Healey, Christopher J.	Prepare correspondence regarding to-do issues.	\$830	0.3		\$249.00									
	6/10/2019 Healey, Christopher J.	Correspondence regarding state enforcement of sufficient staffing requirement.	\$830	0.2		\$166.00									
	6/10/2019 Healey, Christopher J.	Review and comment on amended complaint.	\$830	2		\$1,660.00									
	6/10/2019 Healey, Christopher J.	Review and revise CLRA demand letter.	\$830	1		\$830.00									
	6/10/2019 Healey, Christopher J.	Review and analysis regarding Shiferaw decision.	\$830	0.5		\$415.00									
	6/10/2019 Healey, Christopher J.	Prepare correspondence regarding payroll records.	\$830	0.1		\$83.00									
	6/11/2019 Healey, Christopher J.	Correspondence regarding amended complaint.	\$830	0.5		\$415.00									
	6/11/2019 Healey, Christopher J.	Revise amended complaint.	\$830	1.5		\$1,245.00									
	6/11/2019 Healey, Christopher J.	Telephone conference with team regarding amended complaint.	\$830	0.5		\$415.00				0.5	415.00				
	6/11/2019 Healey, Christopher J.	Follow-up correspondence regarding same.	\$830	0.3		\$249.00									
	6/12/2019 Cocchia, Robert A.	Review and revise draft CLRA demand letter.	\$745	0.2		\$149.00									
	6/12/2019 Cocchia, Robert A.	Review draft amended complaint.	\$745	0.3		\$223.50									
	6/12/2019 Cocchia, Robert A.	Prepare for discovery conference with defendant's counsel and legal research regarding same.	\$745	1.5		\$1,117.50									
	6/12/2019 Healey, Christopher J.	Correspondence regarding meet and confer conference.	\$830	0.1		\$83.00									
	6/12/2019 Healey, Christopher J.	Review and revise CLRA letter.	\$830	0.1		\$83.00									
	6/12/2019 Healey, Christopher J.	Prepare correspondence regarding same.	\$830	0.1		\$83.00									
	6/12/2019 Healey, Christopher J.	Review and revise amended complaint.	\$830	0.5		\$415.00									
	6/12/2019 Healey, Christopher J.	Correspondence regarding proposed amended complaint.	\$830	0.3		\$249.00									
	6/12/2019 Healey, Christopher J.	Continue revising amended complaint.	\$830	0.5		\$415.00									
	6/12/2019 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding CLRA letter.	\$830	0.2		\$166.00									
	6/12/2019 Healey, Christopher J.	Prepare for and participate in telephonic meet and confer with defendant's counsel regarding responses to written discovery.	\$745	2.4		\$1,788.00									
	6/13/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding follow up discovery and motion practice.	\$745	0.3		\$223.50									
	6/13/2019 Healey, Christopher J.	Prepare correspondence to team regarding to do issues.	\$830	0.1		\$83.00									
	6/13/2019 Healey, Christopher J.	Prepare correspondence regarding Marks firm status.	\$830	0.1		\$83.00									
	6/13/2019 Healey, Christopher J.	Draft conference call agenda and correspondence to team regarding same.	\$830	0.1		\$83.00									
	6/13/2019 Healey, Christopher J.	Prepare correspondence regarding to do items.	\$830	0.3		\$249.00									
	6/13/2019 Healey, Christopher J.	Prepare for meet and confer telephone call.	\$830	0.3		\$249.00									
	6/13/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding meet and confer discussion.	\$830	0.5		\$415.00									
	6/13/2019 Healey, Christopher J.	Participate in meet and confer call with defense counsel.	\$830	0.9		\$747.00									
	6/13/2019 Healey, Christopher J.	Draft meet and confer summary.	\$830	0.7		\$581.00									
	6/14/2019 Healey, Christopher J.	Outline to do issues.	\$830	0.3		\$249.00									
	6/14/2019 Healey, Christopher J.	Prepare for team call.	\$830	0.1		\$83.00									
	6/14/2019 Healey, Christopher J.	Conference call with team.	\$830	0.2		\$166.00				0.2	166.00				
	6/14/2019 Healey, Christopher J.	Review association of counsel.	\$830	0.1		\$83.00									
	6/14/2019 Healey, Christopher J.	Draft stipulation regarding second amended complaint.	\$830	0.5		\$415.00									
	6/14/2019 Healey, Christopher J.	Correspondence regarding Shiferaw case.	\$830	0.2		\$166.00									
	6/14/2019 Healey, Christopher J.	Draft confirmation email regarding confidential documents.	\$830	0.5		\$415.00									
	6/14/2019 Healey, Christopher J.	Prepare correspondence regarding subset proposal.	\$830	0.3		\$249.00									
	6/14/2019 Healey, Christopher J.	Draft proposed response regarding mediation position.	\$830	0.5		\$415.00									
	6/14/2019 Healey, Christopher J.	Prepare correspondence regarding draft stipulation.	\$830	0.2		\$166.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	6/17/2019 Healey, Christopher J.	Correspondence with Attorney Needham regarding mediation position.	\$830	0.2		\$166.00								
	6/17/2019 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding sample protocol.	\$830	0.3		\$249.00								
	6/17/2019 Healey, Christopher J.	Revise email to Attorney Maryott regarding mediation timing issue.	\$830	0.2		\$166.00								
	6/17/2019 Healey, Christopher J.	Review Defendant's changes to stipulation regarding Second Amended Complaint.	\$830	0.2		\$166.00								
	6/17/2019 Healey, Christopher J.	Draft proposed revisions.	\$830	0.3		\$249.00								
	6/17/2019 Healey, Christopher J.	Follow-up correspondence regarding same.	\$830	0.2		\$166.00								
	6/18/2019 Healey, Christopher J.	Correspondence regarding document production.	\$830	0.2		\$166.00								
	6/18/2019 Healey, Christopher J.	Follow-up correspondence regarding same.	\$830	0.1		\$83.00								
	6/18/2019 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location.	\$195	0.3		\$58.50								
	6/20/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding status of discovery disputes.	\$745	0.3		\$223.50								
	6/20/2019 Cocchia, Robert A.	Review and revise draft correspondence to defendant's counsel regarding mediation.	\$745	0.2		\$149.00								
	6/20/2019 Cocchia, Robert A.	Review issues regarding service of amended complaint on new party.	\$745	0.4		\$298.00								
	6/20/2019 Healey, Christopher J.	Correspondence regarding defendants' second document production.	\$830	0.1		\$83.00								
	6/20/2019 Healey, Christopher J.	Conferences with Attorney Cocchia regarding discovery status.	\$830	0.3		\$249.00								
	6/20/2019 Healey, Christopher J.	Correspondence regarding mediation issues.	\$830	0.1		\$83.00								
	6/20/2019 Healey, Christopher J.	Review and revise correspondence regarding mediation brief.	\$830	0.2		\$166.00								
	6/20/2019 Healey, Christopher J.	Analysis regarding potential use of RCFE statute regarding sufficient staffing.	\$830	0.3		\$249.00								
	6/20/2019 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding arbitration issues.	\$830	0.2		\$166.00								
	6/20/2019 Healey, Christopher J.	Correspondence regarding same.	\$830	0.1										
	6/20/2019 Healey, Christopher J.	Telephone conference with Attorneys Stebner and Thamer regarding case strategy and staffing issues.	\$830	0.1		\$83.00								
	6/20/2019 Healey, Christopher J.	Review Manor Care class certification order.	\$830	0.1		\$83.00								
	6/20/2019 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location.	\$195	0.3		\$58.50								
	6/21/2019 Cocchia, Robert A.	Review settlement offer from defendant.	\$745	0.1		\$74.50								
	6/21/2019 Cocchia, Robert A.	Attend to filing and service issues for amended complaint.	\$745	0.3		\$223.50								
	6/21/2019 Healey, Christopher J.	Review defendant's settlement proposal.	\$830	0.1		\$83.00								
	6/21/2019 Healey, Christopher J.	Correspondence regarding same.	\$830	0.2		\$166.00								
	6/22/2019 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding defendant's settlement proposal.	\$830	0.1		\$83.00								
	6/23/2019 Healey, Christopher J.	Research regarding Rule 68 settlement offer for class reps.	\$830	0.5		\$415.00								
	6/24/2019 Healey, Christopher J.	Correspondence regarding settlement offer.	\$830	0.1		\$83.00								
	6/25/2019 Cocchia, Robert A.	Outline discovery motions regarding Defendant's responses to written discovery and proposed protective order.	\$745	1.4		\$1,043.00								
	6/25/2019 Cocchia, Robert A.	Pull orders from the Magistrate Judge regarding protective orders.	\$745	0.5		\$372.50								
	6/25/2019 Healey, Christopher J.	Analysis regarding individual settlement offers.	\$830	0.5		\$415.00								
	6/25/2019 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding same.	\$830	0.2		\$166.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	6/25/2019 Healey, Christopher J.	Research regarding Rule 68 offers.	\$830	1									
	6/25/2019 Healey, Christopher J.	Correspondence to team regarding same.	\$830	0.2									
	6/26/2019 Cocchia, Robert A.	Analyze docket for Shiferaw matter, review pleadings from same and identify further pleadings, declarations and evidence to pull and review.	\$745	1.5									
	6/26/2019 Cocchia, Robert A.	Draft outline for discovery motions.	\$745	0.8									
	6/27/2019 Cocchia, Robert A.	Draft joint stipulation for discovery motion regarding identity of class members and legal research regarding same.	\$745	4.2									
	6/27/2019 Cocchia, Robert A.	Draft e-mail to defendant's counsel regarding meet and confer on discovery responses.	\$745	0.2									
	6/27/2019 Healey, Christopher J.	Review correspondence regarding discovery issues.	\$830	0.1									
	6/28/2019 Cocchia, Robert A.	Continue drafting joint stipulation in support of motion to compel further responses from Defendant and legal research regarding same.	\$745	2.5									
	6/30/2019 Healey, Christopher J.	Correspondence regarding status and settlement response.	\$830	0.1									
	7/1/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding discovery status and issues related to motion for protective order.	\$745	0.4									
	7/1/2019 Cocchia, Robert A.	Legal research regarding over-designation issue.	\$745	1.1									
	7/1/2019 Healey, Christopher J.	Analysis of Blair RAC arbitration decision and ramification regarding same.	\$830	0.3									
	7/1/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery and protective order issues.	\$830	0.5									
	7/2/2019 Cocchia, Robert A.	Legal research regarding disclosure of fact witnesses related to motion to compel further responses from defendant.	\$745	1.2									
	7/3/2019 Cocchia, Robert A.	Review correspondence from plaintiff's counsel regarding discovery issues.	\$745	0.1									
	7/3/2019 Healey, Christopher J.	Analysis regarding potential impact of Rent-A-Center public injunctive relief decision and correspondence regarding same.	\$830	0.4									
	7/3/2019 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding same.	\$830	0.2									
	7/3/2019 Healey, Christopher J.	Correspondence with Attorney Wallace regarding Rent-A-Center and arbitration issues.	\$830	0.1									
	7/6/2019 Myrick, Tracy R.	Download defendant production to network and provide caseteam with link to location.	\$195	0.3									
	7/9/2019 Healey, Christopher J.	Office conference regarding case status and discovery.	\$830	0.1									
	7/9/2019 Healey, Christopher J.	Office conference regarding defendant's document production.	\$830	0.2									
	7/10/2019 Cocchia, Robert A.	Review documents produced by Defendant.	\$745	1.4									
	7/10/2019 Cocchia, Robert A.	Exchange e-mails with co-counsel regarding same.	\$745	0.2									
	7/10/2019 Healey, Christopher J.	Correspondence regarding staffing model inquiry.	\$830	0.1									
	7/10/2019 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding same.	\$830	0.1									
	7/10/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.1									
	7/10/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding same.	\$830	0.1									
	7/10/2019 Healey, Christopher J.	Prepare correspondence to team regarding document review issues.	\$830	0.1									
	7/11/2019 Cocchia, Robert A.	Review draft document subpoenas to state agencies.	\$745	0.3									
	7/11/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding status of discovery.	\$745	0.2									
	7/11/2019 Healey, Christopher J.	Office conference regarding DDS citations and discovery.	\$830	0.1									
	7/11/2019 Healey, Christopher J.	Review CCL records subpoenas.	\$830	0.1									
	7/11/2019 Healey, Christopher J.	Prepare correspondence regarding DDS citation summary.	\$830	0.1									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/12/2019 Cocchia, Robert A.	Review and analyze pleadings, deposition transcripts and supporting documents in Shiferaw employment class action for evidence regarding staffing and time keeping practices.	\$745	6.8		\$5,066.00								
	7/12/2019 Cocchia, Robert A.	Draft e-mail to defendant regarding meet and confer on discovery responses.	\$745	0.1		\$74.50								
	7/15/2019 Cocchia, Robert A.	Review defendant's July 12, 2019 meet and confer response.	\$745	0.7		\$521.50								
	7/15/2019 Cocchia, Robert A.	Review Sunrise's notice of third party subpoenas.	\$745	0.2		\$149.00								
	7/15/2019 Cocchia, Robert A.	Legal research regarding pre-certification discovery and right to privacy related to Sunrise's objections to first set of written discovery.	\$745	3.2		\$2,384.00								
	7/15/2019 Healey, Christopher J.	Review discovery meet and confer letter.	\$830	0.3		\$249.00								
	7/16/2019 Cocchia, Robert A.	Draft motion to compel and for protective order.	\$745	2.8		\$2,086.00								
	7/16/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding discovery motions and strategy.	\$745	1.2		\$894.00								
	7/16/2019 Cocchia, Robert A.	Review answer to second amended complaint.	\$745	0.6		\$447.00								
	7/16/2019 Healey, Christopher J.	Review defendants' meet and confer letter and outline response to same.	\$830	1.5		\$1,245.00								
	7/16/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery motion.	\$830	1		\$830.00								
	7/16/2019 Healey, Christopher J.	Review CCL records subpoenas.	\$830	0.1		\$83.00								
	7/17/2019 Cocchia, Robert A.	Finalize subpoenas to Department of Social Services regarding files on Sunrise's facilities.	\$745	0.3		\$223.50								
	7/17/2019 Cocchia, Robert A.	Continue drafting motion to compel further responses to interrogatories and legal research regarding same.	\$745	4.6		\$3,427.00								
	7/18/2019 Cocchia, Robert A.	Continue drafting motion to compel responses to interrogatories and for entry of protective order and lega research regarding same.	\$745	6		\$4,470.00								
	7/19/2019 Cocchia, Robert A.	Telephone conference with Department of Social Services regarding subpoenas.	\$745	0.2		\$149.00								
	7/19/2019 Cocchia, Robert A.	Review and exchange e-mails with team regarding same.	\$745	0.1		\$74.50								
	7/19/2019 Cocchia, Robert A.	Telephone conference with attorney for Department of Social Services regarding subpoenas.	\$745	0.2		\$149.00								
	7/19/2019 Cocchia, Robert A.	Continue drafting motion to compel and legal research regarding same.	\$745	3.3		\$2,458.50								
	7/22/2019 Cocchia, Robert A.	Follow up on document subpoenas to DSS, multiple telephone conferences with DSS regarding extensions of time and scope of the subpoenas.	\$745	2		\$1,490.00								
	7/22/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding scope.	\$745											
	7/22/2019 Cocchia, Robert A.	Draft discovery motion and supporting documents.	\$745	2.5		\$1,862.50								
	7/23/2019 Cocchia, Robert A.	Multiple telephone calls with regional DSS offices regarding document subpoenas.	\$745	1.2		\$894.00								
	7/23/2019 Cocchia, Robert A.	Exchange e-mails with DSS representatives regarding same.	\$745	0.1		\$74.50								
	7/23/2019 Cocchia, Robert A.	Draft motion to compel discovery and for protective order.	\$745	3.5		\$2,607.50								
	7/23/2019 Healey, Christopher J.	Office conference regarding draft motion.	\$830	0.1		\$83.00								
	7/24/2019 Cocchia, Robert A.	Review and exchange e-mails with Attorneys Healey and Umpierre regarding ESI protocol.	\$745	0.2		\$149.00								
	7/24/2019 Cocchia, Robert A.	Legal research regarding invalid objections to written discovery for motion to compel.	\$745	0.8		\$596.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>		
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>
	7/24/2019 Cocchia, Robert A.	Finalize draft discovery motion and forward same to Attorney Healey for review.	\$745	4.5		\$3,352.50							
	7/24/2019 Cocchia, Robert A.	Telephone conference with attorney service regarding service of subpoenas on DSS and research regarding payment of witness fees.	\$745	0.7		\$521.50							
	7/24/2019 Healey, Christopher J.	Draft conference call agenda.	\$830	0.1		\$83.00							
	7/24/2019 Healey, Christopher J.	Review and revise draft discovery motion.	\$830	1		\$830.00							
	7/24/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding same.	\$830	0.4		\$332.00							
	7/25/2019 Cocchia, Robert A.	Prepare for and participate in team conference call.	\$745	1.4		\$1,043.00			1.4	1,043.00			
	7/25/2019 Cocchia, Robert A.	Analyze resident assessment records obtained from DSS in preparation for discussions with DSS and opposing counsel on DSS subpoenas.	\$745	0.5		\$372.50							
	7/25/2019 Cocchia, Robert A.	Pull exhibits for discovery and protective order motion.	\$745	0.8		\$596.00							
	7/25/2019 Cocchia, Robert A.	Review file regarding status of ESI protocol and exchange e-mails regarding same.	\$745	0.4		\$298.00							
	7/25/2019 Healey, Christopher J.	Review and revise discovery motion.	\$830	1.2		\$996.00							
	7/25/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.1		\$83.00							
	7/25/2019 Healey, Christopher J.	Conference call with team regarding case status, discovery and tactics.	\$830	0.3		\$249.00			0.3	249.00			
	7/25/2019 Healey, Christopher J.	Correspondence regarding DSS records.	\$830	0.2		\$166.00							
	7/25/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery motion.	\$830	0.1		\$83.00							
	7/25/2019 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding discovery issues.	\$830	0.1		\$83.00							
	7/26/2019 Cocchia, Robert A.	Draft motion to compel and motion for protective order, and declaration and exhibits in support of same.	\$745	1.8		\$1,341.00							
	7/26/2019 Cocchia, Robert A.	Review edits and revisions from team and follow up legal research regarding same.	\$745	1.5		\$1,117.50							
	7/29/2019 Cocchia, Robert A.	Finalize draft joint stipulation regarding discovery and protective order and draft declaration in support of same.	\$745	3.8		\$2,831.00							
	7/29/2019 Cocchia, Robert A.	Telephone conference with Attorney Lundgren from DSS regarding scope of subpoena and pull materials to forward to Attorney Lundgren regarding case background.	\$745	1		\$745.00							
	7/29/2019 Cocchia, Robert A.	Draft e-mail to defendant's counsel regarding extension of time to oppose third party subpoenas.	\$745	0.2		\$149.00							
	7/29/2019 Cocchia, Robert A.	Forward discovery motion to opposing counsel pursuant to Rule 37.	\$745	0.5		\$372.50							
	7/29/2019 Healey, Christopher J.	Review letter regarding CCL discovery.	\$830	0.1		\$83.00							
	7/29/2019 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding same.	\$830	0.1		\$83.00							
	7/29/2019 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding same.	\$830	0.1		\$83.00							
	7/30/2019 Cocchia, Robert A.	Review incoming objections and correspondence from DSS regarding subpoenas.	\$745	0.3		\$223.50							
	7/30/2019 Cocchia, Robert A.	Review correspondence from Defendants' counsel regarding third party discovery and discovery motions.	\$745	0.3		\$223.50							
	7/30/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding same.	\$745	0.2		\$149.00							
	7/30/2019 Cocchia, Robert A.	Begin preparing joint stipulation for discovery motion on request for production of documents and research regarding same.	\$745	1.5		\$1,117.50							

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/30/2019 Cocchia, Robert A.	Draft correspondence to Defendants' counsel regarding discovery issues.	\$745	0.5		\$372.50									
	7/30/2019 Healey, Christopher J.	Review Gibson email regarding discovery issues.	\$830	0.1		\$83.00									
	7/30/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding same.	\$830	0.2		\$166.00									
	7/30/2019 Healey, Christopher J.	Prepare correspondence to team regarding discovery to do issues.	\$830	0.5		\$415.00									
	7/31/2019 Cocchia, Robert A.	Draft correspondence to Defendants' counsel regarding joint stipulation and pending discovery issues.	\$745	0.7		\$521.50									
	7/31/2019 Cocchia, Robert A.	Draft summary of RFP production and meet and confer issues.	\$745	2.1		\$1,564.50									
	7/31/2019 Healey, Christopher J.	Office conference regarding discovery proposal.	\$830	0.1		\$83.00									
	8/1/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding discovery status and theory of damages.	\$745	0.5		\$372.50									
	8/1/2019 Cocchia, Robert A.	Review correspondence from Defendants' counsel regarding discovery.	\$745	0.1		\$74.50									
	8/1/2019 Cocchia, Robert A.	Begin drafting joint stipulation regarding Requests for Production of Documents (Set One).	\$745	1		\$745.00									
	8/1/2019 Healey, Christopher J.	Office conference regarding discovery issues.	\$830	0.2		\$166.00									
	8/2/2019 Cocchia, Robert A.	Review materials regarding meeting with Defendant in December 2017.	\$745	0.3		\$223.50									
	8/2/2019 Cocchia, Robert A.	Brief conference with Attorney Healey regarding Defendants' production of documents.	\$745	0.5		\$372.50									
	8/2/2019 Cocchia, Robert A.	Draft e-mail to Defendants regarding discovery motions.	\$745	0.1		\$74.50									
	8/2/2019 Healey, Christopher J.	Review discovery correspondence.	\$830	0.2		\$166.00									
	8/2/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery issues.	\$830	0.2		\$166.00									
	8/4/2019 Healey, Christopher J.	Research and analysis regarding arbitration issues.	\$830	0.5		\$415.00									
	8/5/2019 Cocchia, Robert A.	Review correspondence from DSS regarding outstanding subpoenas.	\$745	0.2		\$149.00									
	8/5/2019 Cocchia, Robert A.	Draft e-mail to Attorney Healey regarding status of DSS subpoenas.	\$745	0.4		\$298.00									
	8/5/2019 Healey, Christopher J.	Research and analysis regarding arbitration approach.	\$830	0.4		\$332.00									
	8/6/2019 Cocchia, Robert A.	Review research regarding arbitration issue.	\$745	0.5		\$372.50									
	8/6/2019 Healey, Christopher J.	Outline approach regarding arbitration issues.	\$830	0.2		\$166.00									
	8/6/2019 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$830	0.1		\$83.00									
	8/7/2019 Cocchia, Robert A.	Review and exchange e-mails with DSS regarding document subpoenas.	\$745	0.3		\$223.50									
	8/7/2019 Cocchia, Robert A.	Telephone conference with Attorney Kawamoto regarding DSS subpoenas and forward materials regarding same.	\$745	0.5		\$372.50									
	8/7/2019 Healey, Christopher J.	Prepare correspondence regarding DSS subpoenas.	\$830	0.1		\$83.00									
	8/7/2019 Healey, Christopher J.	Prepare correspondence to team regarding to do issues and status.	\$830	0.1		\$83.00									
	8/8/2019 Cocchia, Robert A.	Review correspondence from DSS regarding document subpoenas.	\$745	0.3		\$223.50									
	8/8/2019 Cocchia, Robert A.	Conference with co-counsel regarding same.	\$745	0.2		\$149.00				0.2	149.00				
	8/8/2019 Healey, Christopher J.	Review correspondence regarding meet and confer issues.	\$830	0.1		\$83.00									
	8/9/2019 Cocchia, Robert A.	Exchange e-mails with opposing counsel regarding meet and confer on responses to document requests.	\$745	0.2		\$149.00									
	8/9/2019 Cocchia, Robert A.	Telephone conference with co-counsel regarding DSS subpoenas and discovery meet and confer.	\$745	0.4		\$298.00				0.4	298.00				

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	8/9/2019 Cocchia, Robert A.	Research regarding third party subpoenas.	\$745	0.6		\$447.00								
	8/9/2019 Cocchia, Robert A.	Draft e-mail to co-counsel regarding same.	\$745	0.2		\$149.00								
	8/10/2019 Healey, Christopher J.	Research regarding Hutcheson power of attorney and related issues.	\$830	0.2		\$166.00								
	8/12/2019 Healey, Christopher J.	Research correspondence regarding Hutcheson arbitration issues.	\$830	0.5		\$415.00								
	8/13/2019 Cocchia, Robert A.	Review Sprunk decision and relevant case cites regarding waiver of arbitration.	\$745	1.2		\$894.00								
	8/13/2019 Cocchia, Robert A.	Prepare for meet and confer on request for production of documents, set one, and review documents produced by Sunrise to date.	\$745	3.5		\$2,607.50								
	8/13/2019 Healey, Christopher J.	Research regarding arbitration waiver issue.	\$830	0.3		\$249.00								
	8/14/2019 Cocchia, Robert A.	Analyze Sunrise's production of documents to date.	\$745	3.5		\$2,607.50								
	8/14/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding meet and confer on Defendants' production of documents.	\$745	0.6		\$447.00								
	8/14/2019 Cocchia, Robert A.	Pull materials regarding staffing procedures from production and circulated to team.	\$745	0.5		\$372.50								
	8/14/2019 Cocchia, Robert A.	Prepare for further meet and confer conference with defendants regarding request for production set one.	\$745	2.5		\$1,862.50								
	8/14/2019 Cocchia, Robert A.	Review and exchange e-mails regarding DSS subpoenas.	\$745	0.3		\$223.50								
	8/14/2019 Cocchia, Robert A.	Telephone conference with co-counsel regarding DSS subpoenas. Prepare correspondence to team regarding conference call, conference regarding impact of Sprunk decision and research regarding fraud in inducement issue.	\$745	0.3		\$223.50								
	8/14/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery meet and confer.	\$830	0.1		\$83.00								
	8/14/2019 Healey, Christopher J.	Prepare for and participate in meet and confer with defendants' counsel regarding responses to RFP Set 1.	\$830	0.7		\$581.00								
	8/15/2019 Cocchia, Robert A.	Draft e-mail to team regarding discovery issues.	\$745	1.5		\$1,117.50								
	8/15/2019 Cocchia, Robert A.	Draft revisions to proposed protective order and legal research regarding same.	\$745	0.5		\$372.50								
	8/15/2019 Cocchia, Robert A.	Participate in team conference call.	\$745	1.3		\$968.50								
	8/15/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding update on discovery issues and case strategy.	\$745	0.3		\$223.50			0.3	223.50				
	8/15/2019 Cocchia, Robert A.	Review correspondence regarding discovery meet and confer.	\$745	0.5		\$372.50								
	8/15/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding meet and confer position.	\$830	0.5		\$415.00								
	8/15/2019 Healey, Christopher J.	Review Sunrise documents.	\$830	0.4		\$332.00								
	8/15/2019 Healey, Christopher J.	Prepare correspondence to team regarding discovery issues.	\$830	0.3		\$249.00								
	8/15/2019 Healey, Christopher J.	Prepare for team call and conference call with team regarding status and tactics.	\$830	0.3		\$249.00								
	8/15/2019 Healey, Christopher J.	Correspondence regarding discovery issues.	\$830	0.2		\$166.00			0.3	249.00				
	8/15/2019 Healey, Christopher J.	Telephone conference with Attorney Johnson regarding discovery.	\$830	0.2		\$166.00								
	8/16/2019 Cocchia, Robert A.	Review correspondence from Defendants' counsel to DSS regarding objections to subpoena and legal research regarding same.	\$830	0.2		\$166.00								
	8/16/2019 Cocchia, Robert A.	Review correspondence from Defendants' counsel to DSS regarding objections to subpoena and legal research regarding same.	\$745	1.4		\$1,043.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	8/16/2019 Cocchia, Robert A.	Prepare for and participate in telephone conference with opposing counsel and DSS regarding subpoenas.	\$745	0.6									
	8/16/2019 Cocchia, Robert A.	Telephone conference with co-counsel regarding enforcement of DSS subpoenas and status of protective order.	\$745	0.4				0.4	298.00				
	8/16/2019 Cocchia, Robert A.	Telephone conference with co-counsel regarding discovery motions for document requests.	\$745	0.7	\$521.50			0.7	521.50				
	8/16/2019 Cocchia, Robert A.	Exchange e-mails with co-counsel regarding same.	\$745	0.1	\$74.50								
	8/16/2019 Cocchia, Robert A.	Revise draft protective order and research regarding same.	\$745	1.5	\$1,117.50								
	8/16/2019 Healey, Christopher J.	Review revised protective order.	\$830	0.1	\$83.00								
	8/16/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.1	\$83.00								
	8/16/2019 Healey, Christopher J.	Review key documents.	\$830	1.8	\$1,494.00								
	8/18/2019 Healey, Christopher J.	Analysis regarding POA cases and related arbitration issues.	\$830	1	\$830.00								
	8/19/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding class certification issues and strategy regarding arbitration agreements.	\$745	0.2	\$149.00								
	8/19/2019 Healey, Christopher J.	Research regarding POA, Probate Code and related arbitration issues.	\$830	0.4	\$332.00								
	8/20/2019 Cocchia, Robert A.	Revise draft stipulated protective order and forward same to opposing counsel for review.	\$745	1.5	\$1,117.50								
	8/20/2019 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel and team regarding status of outstanding discovery disputes.	\$745	0.4	\$298.00								
	8/20/2019 Cocchia, Robert A.	Review and exchange e-mails with team regarding revisions to protective order.	\$745	0.5	\$372.50								
	8/20/2019 Cocchia, Robert A.	Research regarding pre-certification discovery.	\$745	1.8	\$1,341.00								
	8/20/2019 Healey, Christopher J.	Analysis and outline regarding arbitration rules/approach and review Attorney Erickson notes regarding same.	\$830	0.9	\$747.00								
	8/20/2019 Healey, Christopher J.	Correspondence with Attorney Erickson and Attorney Wallace regarding arbitration issues and further analysis regarding arbitration issues.	\$830	0.4	\$332.00								
	8/21/2019 Cocchia, Robert A.	Review and exchange e-mails with team regarding discovery issues and communications from opposing counsel.	\$745	0.4	\$298.00								
	8/21/2019 Cocchia, Robert A.	Follow-up research regarding issues raised by opposing counsel in response to requests for production of documents.	\$745	2.2	\$1,639.00								
	8/21/2019 Healey, Christopher J.	Prepare correspondence to team regarding case status and analysis regarding arbitration issues and draft outline regarding same.	\$830	0.4	\$332.00								
	8/21/2019 Healey, Christopher J.	Review defendants' discovery email.	\$830	0.1	\$83.00								
	8/21/2019 Healey, Christopher J.	Research and analysis regarding arbitration defense and related issues.	\$830	1.2	\$996.00								
	8/22/2019 Healey, Christopher J.	Draft outline regarding arbitration defense and related issues.	\$830	1.2	\$996.00								
	8/23/2019 Cocchia, Robert A.	Review legal analysis of arbitration defense and review and exchange e-mails with team regarding same.	\$745	1	\$745.00								
	8/23/2019 Cocchia, Robert A.	Review correspondence regarding Sunrise's subpoenas for medical records.	\$745	0.1	\$74.50								
	8/23/2019 Healey, Christopher J.	Revise analysis regarding arbitration issues.	\$830	1.1	\$913.00								
	8/25/2019 Cocchia, Robert A.	Review and exchange e-mails with Defendants' counsel regarding further meet and confer on protective order.	\$745	0.2	\$149.00								
	8/26/2019 Cocchia, Robert A.	Review and exchange e-mails regarding DSS subpoenas and discovery to Sunrise.	\$745	0.4	\$298.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	8/26/2019 Cocchia, Robert A.	Continue draft joint stipulation regarding Sunrise's responses to request for production and legal research regarding same.	\$745	4									
	8/26/2019 Healey, Christopher J.	Review discovery correspondence.	\$830	0.1			\$83.00						
	8/27/2019 Cocchia, Robert A.	Analyze research on class arbitration issues.	\$745	1.5			\$1,117.50						
	8/28/2019 Cocchia, Robert A.	Prepare for and participate in telephone conference with opposing counsel to meet and confer over protective order and special interrogatories.	\$745	1			\$745.00						
	8/28/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding arbitration issues.	\$745	0.5			\$372.50						
	8/28/2019 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel and team regarding discovery issues and notice to class members.	\$745	0.5			\$372.50						
	8/28/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery status.	\$830	0.2			\$166.00						
	8/29/2019 Cocchia, Robert A.	Review and exchange e-mails regarding outstanding discovery issues.	\$745	0.5			\$372.50						
	8/30/2019 Healey, Christopher J.	Review cases regarding evidence to support "individual issues".	\$830	0.6			\$498.00						
	9/2/2019 Healey, Christopher J.	Review cases regarding Defendants' evidentiary burden on class certification motion and prepare correspondence to team regarding same.	\$830	0.4			\$332.00						
	9/3/2019 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel regarding discovery motions and protective order.	\$745	0.4			\$298.00						
	9/4/2019 Healey, Christopher J.	Correspondence regarding case status.	\$830	0.1			\$83.00						
	9/5/2019 Cocchia, Robert A.	Revise draft joint stipulation to compel further responses to special interrogatories, set one, and legal research regarding same.	\$745	1.5			\$1,117.50						
	9/5/2019 Healey, Christopher J.	Prepare correspondence to team regarding case status and to do issues.	\$830	0.1			\$83.00						
	9/6/2019 Cocchia, Robert A.	Finalize draft joint stipulation to compel further responses to special interrogatories set one.	\$745	1.4			\$1,043.00						
	9/6/2019 Cocchia, Robert A.	Draft e-mail to Attorney Healey regarding same.	\$745	0.1			\$74.50						
	9/6/2019 Healey, Christopher J.	Review and revise draft discovery motion.	\$830	0.2			\$166.00						
	9/6/2019 Healey, Christopher J.	Prepare correspondence regarding same.	\$830	0.1			\$83.00						
	9/6/2019 Healey, Christopher J.	Research and analysis regarding Nissan and related cases on class injury.	\$830	0.3			\$249.00						
	9/9/2019 Cocchia, Robert A.	Finalize draft joint stipulation regarding special interrogatories, set one and declaration/exhibits in support of same and legal research in support of same.	\$745	3.6			\$2,682.00						
	9/9/2019 Cocchia, Robert A.	Draft e-mail to opposing counsel regarding discovery motion.	\$745	0.1			\$74.50						
	9/9/2019 Cocchia, Robert A.	Review status of DSS subpoenas.	\$745	0.1			\$74.50						
	9/10/2019 Cocchia, Robert A.	Prepare materials for review by Attorney Hayes	\$745	0.3			\$223.50						
	9/10/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding motion to compel investor information.	\$745	0.3			\$223.50						
	9/10/2019 Cocchia, Robert A.	Conference with Attorney Hayes regarding status of discovery.	\$745	0.2			\$149.00						
	9/10/2019 Healey, Christopher J.	Prepare correspondence regarding conference call.	\$830	0.1			\$83.00						
	9/10/2019 Healey, Christopher J.	Prepare correspondence regarding pro hac applications.	\$830	0.1			\$83.00						
	9/10/2019 Hayes, Charles C.	Review and respond to emails from Bob Cocchia and assistant regarding Sunrise Senior Living case.	\$380	0.2			\$76.00						
	9/10/2019 Hayes, Charles C.	Review, organize, and begin high-level analysis of Sunrise pleadings and motions.	\$380	0.4			\$152.00						
	9/10/2019 Hayes, Charles C.	Read and analyze Sunrise First Amended Complaint.	\$380	0.1			\$38.00						

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	9/11/2019 Cocchia, Robert A.	Prepare for and attend conference with Attorney Healey and Attorney Hayes regarding analysis of Daubert issues.	\$745	0.6										
	9/11/2019 Cocchia, Robert A.	Review simulation brief and McCurley case regarding same.	\$745	0.3		\$223.50								
	9/11/2019 Healey, Christopher J.	Outline Daubert research project and meet with Dentons team regarding same.	\$830	0.4		\$332.00								
	9/11/2019 Healey, Christopher J.	Draft conference call agenda.	\$830	0.3		\$249.00								
	9/11/2019 Hayes, Charles C.	Review Sunrise First Amended Complaint regarding facts and promises made, enticements to prospective residents, consequences of poor staffing.	\$380	0.1		\$38.00								
	9/11/2019 Hayes, Charles C.	Review Sunrise motion to compel arbitration or in the alternative to transfer or dismiss, focusing on analyzing Defendant's briefing strategies and issue framing with respect to the introduction, Rule 9(b), primary jurisdiction, and abstention.	\$380	0.4		\$152.00								
	9/11/2019 Hayes, Charles C.	Review Sunrise motion to dismiss in transferred Central District of California case regarding the application of Rule 9(b) and abstention.	\$380	0.2		\$76.00								
	9/11/2019 Hayes, Charles C.	Review opposition to motion to dismiss in transferred Central District of California case regarding the application of Rule 9(b) and abstention.	\$380	0.2		\$76.00								
	9/11/2019 Hayes, Charles C.	Review reply brief to motion to dismiss in transferred Central District of California case regarding Rule 9(b) and the issue of leave to amend.	\$380	0.2		\$76.00								
	9/11/2019 Hayes, Charles C.	Review motion to strike in Sunrise Central District of California case.	\$380	0.3		\$114.00								
	9/11/2019 Hayes, Charles C.	Review and analyze opposition to motion to strike in Sunrise Central District of California case.	\$380	0.3		\$114.00								
	9/11/2019 Hayes, Charles C.	Review reply to motion to strike in Sunrise Central District of California case with an eye to the procedural posture of limiting a class definition pre-discovery via Rule 12(f).	\$380	0.1		\$38.00								
	9/11/2019 Hayes, Charles C.	Meeting with Attorneys Healey and Cocchia regarding Daubert opposition as to computer model expert in class certification setting.	\$380	0.4		\$152.00								
	9/11/2019 Hayes, Charles C.	Review existing research and conduct further research regarding expert admissibility and Daubert in class certification context.	\$380	0.4		\$152.00								
	9/11/2019 Hayes, Charles C.	Review existing brief from Marks firm, specifically focusing on the distinction between accuracy and reliability of an expert's model.	\$380	0.2		\$76.00								
	9/11/2019 Hayes, Charles C.	Review Ninth Circuit case law analyzing Daubert in the class certification context, organize brief accordingly.	\$380	0.4		\$152.00								
	9/12/2019 Cocchia, Robert A.	Conference with Attorney Hayes regarding research on Daubert and Sargon issues for computer modeling.	\$745	0.1		\$74.50								
	9/12/2019 Cocchia, Robert A.	Analysis of plaintiff's proposed protective order and list of direct competitors and legal research regarding same.	\$745	1.6		\$1,192.00								
	9/12/2019 Cocchia, Robert A.	Participate in team conference call.	\$745	0.4		\$298.00			0.4	298.00				
	9/12/2019 Cocchia, Robert A.	Telephone conference with Attorney Johnson regarding motion to compel further production of documents.	\$745	0.3		\$223.50								
	9/12/2019 Healey, Christopher J.	Telephone conference with Attorney Marks regarding analysis/status.	\$830	0.2		\$166.00								
	9/12/2019 Healey, Christopher J.	Prepare for conference call.	\$830	0.1		\$83.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>					
				<u>Worked</u>		<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>	<u>Fees</u>		
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	9/12/2019 Healey, Christopher J.	Review Defendant's protective order and list of "direct competitors".	\$830	0.1	\$83.00								
	9/12/2019 Healey, Christopher J.	Conference with Attorney Cocchia regarding same.	\$830	0.1	\$83.00								
	9/12/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.2	\$166.00								
	9/12/2019 Healey, Christopher J.	Conference call with team regarding status and tactics.	\$830	0.5	\$415.00				0.5		415.00		
	9/12/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding protective order.	\$830	0.1	\$83.00								
	9/12/2019 Healey, Christopher J.	Correspondence with Attorney Marks regarding same.	\$830	0.1	\$83.00								
	9/12/2019 Hayes, Charles C.	Brief legal standard in Daubert opposition, taking into account the class certification context in the 9th Circuit.	\$380	0.2	\$76.00								
	9/12/2019 Hayes, Charles C.	Meet with Attorney Cocchia regarding Daubert brief.	\$380	0.1	\$38.00								
	9/12/2019 Hayes, Charles C.	Compose legal standard as to the application of Daubert in the class certification context in the 9th Circuit.	\$380	0.3	\$114.00								
	9/12/2019 Hayes, Charles C.	Organize Daubert brief into legal standard and analysis sections, perform WestLaw research on calibration of computer modeling in Daubert context, focusing on the reliability prong.	\$380	0.2	\$76.00								
	9/12/2019 Hayes, Charles C.	Draft legal standard and analysis in Daubert opposition brief, focusing on distinction between Rule 702 relevance and reliability and potential counterarguments.	\$380	1	\$380.00								
	9/12/2019 Hayes, Charles C.	Review and exchange e-mails with opposing counsel regarding joint stipulation for discovery motion.	\$380	1	\$380.00								
	9/13/2019 Cocchia, Robert A.	Review status of DSS subpoenas.	\$745	0.2	\$149.00								
	9/13/2019 Cocchia, Robert A.	Conference with team regarding protective order proposal and research regarding limitations on protective order language.	\$745	1.5	\$1,117.50								
	9/13/2019 Healey, Christopher J.	Review class certification decisions and analysis regarding same.	\$830	0.2	\$166.00								
	9/13/2019 Healey, Christopher J.	Review draft correspondence to opposing counsel regarding DSS subpoenas and exchange e-mails with Attorney Kawamoto regarding same.	\$830	0.2	\$166.00								
	9/16/2019 Cocchia, Robert A.	Draft notice of motion and review opposing counsel's insert for joint stipulation on motion to compel.	\$745	0.3	\$223.50								
	9/17/2019 Cocchia, Robert A.	Prepare correspondence regarding meet and confer letter on Request for Production, Set 2.	\$745	2.5	\$1,862.50								
	9/17/2019 Healey, Christopher J.	Review Defendant's response to joint stipulation to compel further responses to interrogatories and case law cited in support of same.	\$830	0.1	\$83.00								
	9/18/2019 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel regarding finalizing joint stipulation.	\$745	3.5	\$2,607.50								
	9/18/2019 Cocchia, Robert A.	Review declarations from opposing counsel regarding joint stipulation.	\$745	0.2	\$149.00								
	9/18/2019 Cocchia, Robert A.	Finalize joint stipulation for filing.	\$745	0.4	\$298.00								
	9/18/2019 Cocchia, Robert A.	Office conference regarding motion to compel briefing.	\$745	0.7	\$166.00								
	9/18/2019 Healey, Christopher J.	Finalize joint statement and exhibits for motion to compel further responses to special interrogatories and file same with the Court.	\$830	0.2	\$1,117.50								
	9/19/2019 Cocchia, Robert A.	Analysis of case law cited by Plaintiff in joint stipulation and prepare outline for supplemental brief.	\$745	1.5	\$1,117.50								
	9/19/2019 Cocchia, Robert A.	Telephone conference with co-counsel regarding DSS subpoenas.	\$745	3.5	\$2,607.50								
	9/19/2019 Cocchia, Robert A.	Review discovery opposition and outline potential responses.	\$745	0.3	\$223.50								
	9/19/2019 Healey, Christopher J.	Review discovery opposition and outline potential responses.	\$830	0.8	\$664.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	9/19/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding same.	\$830	0.2	\$166.00								
	9/20/2019 Cocchia, Robert A.	Review and revise draft correspondence to DSS and opposing counsel regarding subpoenas.	\$745	0.2	\$149.00								
	9/20/2019 Cocchia, Robert A.	Draft e-mail to opposing counsel regarding objection to proposed protective order.	\$745	0.2	\$149.00								
	9/20/2019 Cocchia, Robert A.	Research regarding restrictive language on protective orders regarding experts.	\$745	2.5	\$1,862.50								
	9/20/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding supplemental briefing in support of discovery motion.	\$745	0.5	\$372.50								
	9/20/2019 Cocchia, Robert A.	Draft supplemental brief in support of discovery motion.	\$745	1.4	\$1,043.00								
	9/20/2019 Healey, Christopher J.	Draft inserts to reply brief regarding motion to compel.	\$830	4	\$3,320.00								
	9/20/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding reply brief.	\$830	0.3	\$249.00								
	9/20/2019 Hayes, Charles C.	Review and revise existing draft of Daubert brief, including introduction and legal standard as to admitting expert testimony in the class certification setting.	\$380	0.3	\$114.00								
	9/20/2019 Hayes, Charles C.	Research into Daubert standard as to calibration of computer models and expert admissibility in the Ninth Circuit, take notes of district courts' varying treatment of software models.	\$380	0.5	\$190.00								
	9/21/2019 Hayes, Charles C.	Review existing research on calibration of computer models in the Ninth Circuit, search for relevant case law.	\$380	0.2	\$76.00								
	9/21/2019 Hayes, Charles C.	Review and revise relevance section of Daubert brief.	\$380	0.2	\$76.00								
	9/21/2019 Hayes, Charles C.	Review Ninth Circuit case law and revise relevance section of Daubert brief.	\$380	0.1	\$38.00								
	9/21/2019 Hayes, Charles C.	Continue initial draft of relevance section of Daubert brief, anticipating counterarguments and how to approach them.	\$380	0.4	\$152.00								
	9/22/2019 Hayes, Charles C.	Review and revise relevance section of Daubert brief, incorporating previous annotations of Ninth Circuit precedent.	\$380	0.2	\$76.00								
	9/22/2019 Hayes, Charles C.	Review relevant case law and previous annotations, draft reliability section of Daubert brief.	\$380	0.6	\$228.00								
	9/22/2019 Hayes, Charles C.	Review existing factual introduction of Daubert brief and continue drafting analysis, focusing on testing and calibration of the relevant model in the Ninth Circuit.	\$380	0.4	\$152.00								
	9/22/2019 Hayes, Charles C.	Draft calibration section of the Daubert brief, anticipating "universal workers" argument and how it might relate to a reliability challenge.	\$380	0.4	\$152.00								
	9/22/2019 Hayes, Charles C.	Complete initial draft of the calibration section of the Daubert brief, focusing on the assumptions underlying the model.	\$380	0.3	\$114.00								
	9/23/2019 Cocchia, Robert A.	Draft supplemental memorandum in support of motion to compel further responses to Special Interrogatories.	\$745	7.2	\$5,364.00								
	9/23/2019 Cocchia, Robert A.	Review research regarding Daubert issues.	\$745	0.3	\$223.50								
	9/23/2019 Healey, Christopher J.	Correspondence regarding potential "subject to arb" plaintiff.	\$830	0.1	\$83.00						0.1	83.00	
	9/23/2019 Healey, Christopher J.	Review and revise motion to compel reply brief.	\$830	2.5	\$2,075.00								
	9/23/2019 Hayes, Charles C.	Read email from Attorney Healey as to Daubert research and simulation admissibility.	\$380	0.1	\$38.00								
	9/23/2019 Hayes, Charles C.	Review existing brief from the Marks firm and make a plan for harmonizing the updated version.	\$380	0.1	\$38.00								
	9/23/2019 Hayes, Charles C.	Compose email to Attorneys Healey and Cocchia summarizing progress on Daubert brief so far, outlining findings briefly, and laying out proposed deadline for brief.	\$380	0.2	\$76.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
		Draft Daubert brief, focusing on bringing facts from the previous brief into the sections dealing with non-calibration factors, updating with Ninth Circuit law as appropriate.	\$380	0.3									
	9/23/2019 Hayes, Charles C.	Draft general acceptance portion of Daubert brief.	\$380	0.2									
	9/23/2019 Hayes, Charles C.	Conference with Attorney Healey about next steps in Daubert brief.	\$380	0.1									
	9/23/2019 Hayes, Charles C.	Review and revise Introduction of Daubert brief, adding Ninth Circuit citations assessing value (and unique advantage) of computer models in context of environmental regulation.	\$380	0.4									
	9/23/2019 Hayes, Charles C.	Continue drafting introductory portion of Daubert brief, introducing methodology of staffing models.	\$380	0.1									
	9/23/2019 Hayes, Charles C.	Review and respond to email from Attorney Healey about trial brief regarding admissibility of computer simulations.	\$380	0.1									
	9/23/2019 Hayes, Charles C.	Review and revise introduction to Daubert brief regarding admissibility of computer model testimony.	\$380	0.5									
	9/23/2019 Hayes, Charles C.	Review and respond to email from Attorney Healey containing secondary sources and other research materials on use of computer models as evidence.	\$380	0.1									
	9/23/2019 Hayes, Charles C.	Complete introductory portion of Daubert brief.	\$380	0.1									
	9/23/2019 Hayes, Charles C.	Review existing draft of legal standard and Daubert analysis, revise as needed.	\$380	0.4									
	9/23/2019 Hayes, Charles C.	Review and revise draft of Daubert brief, plan questions for expert.	\$380	1									
	9/23/2019 Hayes, Charles C.	Send preliminary draft of Daubert brief to Attorneys Healey and Cocchia.	\$380	0.1									
	9/24/2019 Cocchia, Robert A.	Draft supplemental memorandum in support of motion to compel further responses to Special Interrogatories.	\$745	3.2									
	9/24/2019 Cocchia, Robert A.	Telephone conference with Attorney Johnson regarding status of RFP set 2.	\$745	0.4									
	9/24/2019 Cocchia, Robert A.	Draft e-mail to team regarding ESI protocol agreement.	\$745	0.2									
	9/24/2019 Healey, Christopher J.	Review Daubert brief and comment regarding same.	\$830	0.5									
	9/24/2019 Healey, Christopher J.	Revise reply brief.	\$830	1									
	9/24/2019 Hayes, Charles C.	Review secondary sources relating to Daubert brief and admissibility of computer model evidence.	\$380	0.2									
	9/24/2019 Hayes, Charles C.	Collect and review annotated cases on Daubert issue for submission to Attorneys Healey and Cocchia.	\$380	0.3									
	9/24/2019 Hayes, Charles C.	Conference with Attorney Healey about next steps as to Daubert issue, preparing guide for expert.	\$380	0.3									
	9/24/2019 Hayes, Charles C.	Send annotated case law and secondary sources on Daubert issue to Attorneys Healey and Cocchia.	\$380	0.1									
	9/24/2019 Hayes, Charles C.	Respond to Attorney Healey email about updated memo for expert, discuss deadline and next steps.	\$380	0.1									
	9/24/2019 Hayes, Charles C.	Draft memorandum guide for expert on calibration of computer models and establishing reliability for the court.	\$380	0.6									
	9/24/2019 Hayes, Charles C.	Revise Daubert brief, focusing on polishing language and adding additional comments for further revision.	\$380	0.2									
	9/25/2019 Cocchia, Robert A.	Draft proposed Belaire-West notice.	\$745	0.4									
	9/25/2019 Cocchia, Robert A.	Review and exchange e-mails regarding supplemental briefing on discovery motion.	\$745	0.7									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	9/25/2019 Cocchia, Robert A.	Review RFP, set 2 regarding strategy on further discovery motions.	\$745	1.2									
	9/25/2019 Cocchia, Robert A.	Draft e-mail to Attorney Johnson regarding same.	\$745	0.1									
	9/25/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding discovery strategy.	\$745	0.3									
	9/25/2019 Cocchia, Robert A.	Draft multiple correspondence to opposing counsel regarding protective order.	\$745	0.6									
	9/25/2019 Cocchia, Robert A.	Draft meet and confer correspondence on RFP, Set 1.	\$745	1									
	9/25/2019 Cocchia, Robert A.	Review proposed changes to ESI agreement.	\$745	0.3									
	9/25/2019 Healey, Christopher J.	Research and analysis regarding Daubert issues and calibration requirement.	\$830	0.4									
	9/25/2019 Healey, Christopher J.	Office conference regarding Daubert memo.	\$830	0.5									
	9/25/2019 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding same.	\$830	0.2									
	9/25/2019 Healey, Christopher J.	Review and revise Daubert memo.	\$830	0.2									
	9/25/2019 Healey, Christopher J.	Office conference regarding potential order issue.	\$830	0.1									
	9/25/2019 Healey, Christopher J.	Correspondence regarding same.	\$830	0.1									
	9/25/2019 Healey, Christopher J.	Review and revise reply brief.	\$830	0.3									
	9/25/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery.	\$830	0.2									
	9/25/2019 Hayes, Charles C.	Review existing draft of memorandum on model admissibility.	\$380	0.1									
	9/25/2019 Hayes, Charles C.	Revise memorandum guide for expert on calibration of computer models in the Ninth Circuit.	\$380	0.2									
	9/25/2019 Hayes, Charles C.	Revise and complete memorandum guide for expert on calibration of computer model in the Ninth Circuit.	\$380	0.7									
	9/25/2019 Hayes, Charles C.	Research groundwater calibration.	\$380	0.2									
	9/25/2019 Hayes, Charles C.	Send follow-up email to Attorney Healey.	\$380	0.1									
	9/25/2019 Hayes, Charles C.	Conference with Attorney Healey about final steps in calibration of computer model, discuss differences with groundwater modeling.	\$380	0.2									
	9/25/2019 Hayes, Charles C.	Review email from Attorney Healey to co-counsel containing memorandum to expert.	\$380	0.1									
	9/26/2019 Cocchia, Robert A.	Finalize supplemental memorandum in support of motion to compel further responses to special interrogatories, set one.	\$745	1.5									
	9/26/2019 Cocchia, Robert A.	Review and exchange e-mails regarding draft ESI proposal and research regarding same.	\$745	0.7									
	9/26/2019 Cocchia, Robert A.	Research regarding protective order and document requests.	\$745	2.1									
	9/26/2019 Healey, Christopher J.	Prepare correspondence to Attorney Colby regarding Prob Code Section 859.	\$830	0.1									
	9/26/2019 Healey, Christopher J.	Prepare correspondence to C. Valero regarding Lexis searches, and analysis regarding potential amendment issues.	\$830	0.1									
	9/26/2019 Healey, Christopher J.	Conference regarding follow-up research.	\$830	0.1									
	9/26/2019 Valero, Carmen A.	Research caselaw re non-environmental use of term "calibration" in relations to computer models, for C. Healey.	\$360	1									
	9/26/2019 Hayes, Charles C.	Discuss damages and amendment issue with Attorney Healey, receive new assignment.	\$380	0.1									
	9/26/2019 Hayes, Charles C.	Read email from C. Valero about calibration research outside the environmental context.	\$380	0.1									
	9/26/2019 Hayes, Charles C.	Review calibration cases sent by Research and Information Services.	\$380	0.1									
	9/26/2019 Hayes, Charles C.	Review email from Attorney Marks responding to suggestions regarding computer model calibration.	\$380	0.1									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	9/27/2019 Healey, Christopher J.	Office conference regarding revisions to staffing expert declaration.	\$830	0.2		\$166.00									
	9/27/2019 Healey, Christopher J.	Draft agenda for team call.	\$830	0.1		\$83.00									
	9/27/2019 Healey, Christopher J.	Analysis regarding calibration issue.	\$830	0.1		\$83.00									
	9/27/2019 Healey, Christopher J.	Prepare correspondence regarding same.	\$830	0.1		\$83.00									
	9/27/2019 Healey, Christopher J.	Conference call with team regarding status and tactics.	\$830	0.1		\$83.00					0.1	83.00			
	9/27/2019 Hayes, Charles C.	Review and respond to email from Attorney Healey about reviewing expert declaration and providing suggestions about bolstering admissibility.	\$380	0.1		\$38.00									
	9/27/2019 Hayes, Charles C.	Conference with Attorney Healey about new assignment as to Dale Schroyer Declaration.	\$380	0.1		\$38.00									
	9/27/2019 Hayes, Charles C.	Review Dale Schroyer declaration, take notes for revision.	\$380	0.3		\$114.00									
	9/27/2019 Hayes, Charles C.	Revise Dale Schroyer declaration, using previous work on admissibility of Plaintiffs' computer staffing model.	\$380	0.8		\$304.00									
	9/27/2019 Hayes, Charles C.	Revise Dale Schroyer declaration, using previous work on admissibility of Plaintiffs' computer staffing model.	\$380	0.7		\$266.00									
	9/27/2019 Hayes, Charles C.	Prepare summary of revisions to Schroyer declaration, send to Chris Healey via email.	\$380	0.1		\$38.00									
	9/30/2019 Hayes, Charles C.	Research issue as to whether complaint needs to be amended to assert damages pursuant to probate code 859.	\$380	0.4		\$152.00									
	9/30/2019 Hayes, Charles C.	Analyze potential amendment of complaint regarding assertion of probate code § 859 remedy, draft summary.	\$380	0.3		\$114.00									
	9/30/2019 Hayes, Charles C.	Review and compile cases on issue regarding applicability of Probate Code § 859.	\$380	0.6		\$228.00									
	9/30/2019 Hayes, Charles C.	Review forwarded email via Attorney Healey from co-counsel on Probate Code section 859 damages issue.	\$380	0.1		\$38.00									
	10/1/2019 Cocchia, Robert A.	Review and exchange e-mails regarding protective order issues and ESI.	\$745	0.6		\$447.00									
	10/1/2019 Cocchia, Robert A.	Review Defendant's supplemental brief regarding motion to compel further responses to interrogatories.	\$745	0.3		\$223.50									
	10/1/2019 Cocchia, Robert A.	Review draft meet and confer regarding request for production, set two.	\$745	1.2		\$894.00									
	10/1/2019 Cocchia, Robert A.	Legal research regarding class discovery issues prior to certification in preparation for discovery hearing.	\$745	2.4		\$1,788.00			1	745.00					
	10/1/2019 Healey, Christopher J.	Correspondence regarding Sunrise position regarding protective order.	\$830	0.1		\$83.00									
	10/1/2019 Healey, Christopher J.	Prepare correspondence regarding conference call.	\$830	0.1		\$83.00									
	10/1/2019 Healey, Christopher J.	Prepare correspondence regarding Prob Code 859 remedy.	\$830	0.1		\$83.00									
	10/1/2019 Healey, Christopher J.	Correspondence with damage expert regarding analysis.	\$830	0.1		\$83.00									
	10/2/2019 Cocchia, Robert A.	Draft e-mail to opposing counsel regarding protective order issue and research regarding similar protective orders in the Central District.	\$745	0.8		\$596.00									
	10/2/2019 Cocchia, Robert A.	Revise proposed ESI Protocol.	\$745	1.1		\$819.50									
	10/2/2019 Cocchia, Robert A.	Draft e-mail to opposing counsel regarding same.	\$745	0.1		\$74.50									
	10/2/2019 Cocchia, Robert A.	Review and revise draft meet and confer regarding request for production, set 2.	\$745	2.4		\$1,788.00									
	10/2/2019 Cocchia, Robert A.	Research and review pending litigation against Sunrise.	\$745	1		\$745.00									
	10/2/2019 Cocchia, Robert A.	Telephone conference with multiple contacts regarding potential fact witnesses.	\$745	0.9		\$670.50									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	10/3/2019 Cocchia, Robert A.	Draft e-mail to opposing counsel regarding protective order.	\$745	0.2		\$149.00									
	10/3/2019 Cocchia, Robert A.	Review and exchange e-mails with team regarding status of discovery.	\$745	0.4		\$298.00									
	10/3/2019 Cocchia, Robert A.	Finalize revisions to ESI protocol.	\$745	0.7		\$521.50									
	10/3/2019 Cocchia, Robert A.	Draft e-mail to opposing counsel forwarding same.	\$745	0.1		\$74.50									
	10/3/2019 Hayes, Charles C.	Review and respond to email from C. Valero about Probate Code 859 issue.	\$380	0.1		\$38.00									
	10/4/2019 Healey, Christopher J.	Draft agenda for team call.	\$830	0.1		\$83.00									
	10/4/2019 Healey, Christopher J.	Telephone conference with team regarding status and tactics.	\$830	0.2		\$166.00				0.2	166.00				
	10/4/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding status.	\$830	0.1		\$83.00									
	10/4/2019 Healey, Christopher J.	Review Belaire-West notice.	\$830	0.1		\$83.00									
	10/7/2019 Cocchia, Robert A.	Research cases in preparation for hearing on motion to compel further responses to special interrogatories.	\$745	1.4		\$1,043.00									
	10/7/2019 Cocchia, Robert A.	Review and exchange e-mails with team regarding DSS subpoenas.	\$745	0.2		\$149.00									
	10/8/2019 Cocchia, Robert A.	Review and revise draft pro hac vice application for Attorney Marks and review local rules regarding same.	\$745	0.7		\$521.50									
	10/9/2019 Cocchia, Robert A.	Prepare for hearing on motion to compel further responses to special interrogatories, Set 1.	\$745	4.5		\$3,352.50									
	10/9/2019 Cocchia, Robert A.	Review and exchange e-mails regarding status of document production and DSS subpoenas.	\$745	0.4		\$298.00									
	10/9/2019 Cocchia, Robert A.	Initial review of supplemental production of documents.	\$745	0.8		\$596.00									
	10/9/2019 Healey, Christopher J.	Prepare correspondence regarding discovery meet and confer letter regarding Request for Production of Documents, Set 2.	\$830	0.1		\$83.00									
	10/10/2019 Cocchia, Robert A.	Prepare for and attend hearing on motion to compel further responses to Special Interrogatories, Set One.	\$745	6.3		\$4,693.50									
	10/10/2019 Cocchia, Robert A.	Prepare for hearing on motion to compel further responses to Special Interrogatories, Set One.	\$745	2.8		\$2,086.00									
	10/10/2019 Cocchia, Robert A.	Attend hearing on motion to compel further responses to Special Interrogatories, Set One.	\$745	1.5		\$1,117.50									
	10/10/2019 Cocchia, Robert A.	Travel to and from hearing on motion to compel further responses to Special Interrogatories, Set One.	\$745	2		\$1,490.00								2	1490
	10/10/2019 Healey, Christopher J.	Correspondence regarding discovery issues.	\$830	0.1		\$83.00									
	10/10/2019 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding Flat Panel decision.	\$830	0.1		\$83.00									
	10/10/2019 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding same.	\$830	0.2		\$166.00									
	10/10/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery hearing.	\$830	0.5		\$415.00									
	10/10/2019 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location.	\$195	0.5		\$97.50									
	10/15/2019 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel regarding further meet and confer on special interrogatories, set one, as directed by the Court.	\$745	0.3		\$223.50									
	10/15/2019 Cocchia, Robert A.	Review pending document production issues and status of Sunrise's rolling production.	\$745	1.3		\$968.50									
	10/15/2019 Hayes, Charles C.	Review court's prior orders in Central District of California case.	\$380	0.4		\$152.00									
	10/16/2019 Cocchia, Robert A.	Review and exchange case-related e-mail regarding discovery and factual investigation.	\$745	0.4		\$298.00									

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				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	10/16/2019 Cocchia, Robert A.	Review and exchange e-mails regarding further meet and confer on contact information and damages discovery with opposing counsel.	\$745	0.6		\$447.00								
	10/16/2019 Cocchia, Robert A.	Analysis of resident agreements regarding fees collected.	\$745	1.1		\$819.50								
	10/16/2019 Cocchia, Robert A.	Research regarding motion to compel further responses to document production.	\$745	1.7		\$1,266.50								
	10/16/2019 Cocchia, Robert A.	Analysis of Sunrise's document production to date.	\$745	1		\$745.00								
	10/16/2019 Healey, Christopher J.	Review defendants' proposal regarding interrogatory discovery.	\$830	0.2		\$166.00								
	10/16/2019 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$830	0.1		\$83.00								
	10/17/2019 Cocchia, Robert A.	Review and exchange meet and confer correspondence with opposing counsel regarding Special Interrogatories, Set One.	\$745	0.8		\$596.00								
	10/17/2019 Cocchia, Robert A.	Prepare status report for Court regarding same.	\$745	0.4		\$298.00								
	10/17/2019 Cocchia, Robert A.	Telephone conference with opposing counsel regarding production of contact information.	\$745	0.4		\$298.00								
	10/17/2019 Cocchia, Robert A.	Review Sunrise's 10/09/19 document production and draft summary of discovery issues for team.	\$745	2.3		\$1,713.50								
	10/17/2019 Cocchia, Robert A.	Review status of DSS production and exchange e-mails with co-counsel regarding same.	\$745	0.4		\$298.00								
	10/17/2019 Cocchia, Robert A.	Review Sunrise's filing with court regarding meet and confer on 10/10 order.	\$745	0.2		\$149.00								
	10/17/2019 Healey, Christopher J.	Review defendants' portion regarding interrogatory discovery.	\$830	0.1		\$83.00								
	10/17/2019 Healey, Christopher J.	Prepare response regarding same.	\$830	0.1		\$83.00								
	10/17/2019 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding same.	\$830	0.1		\$83.00								
	10/18/2019 Cocchia, Robert A.	Review motion for summary judgment in Aegis regarding arguments concerning staffing representations.	\$745	1.1		\$819.50								
	10/18/2019 Cocchia, Robert A.	Research regarding trade secret discovery for further meet and confer regarding document productions.	\$745	2.8		\$2,086.00								
	10/18/2019 Cocchia, Robert A.	Conference with Attorney Hayes regarding research on discovery issues.	\$745	0.8		\$596.00								
	10/18/2019 Hayes, Charles C.	Research trade secret privilege as it applies in the Central District of California.	\$380	2.6		\$988.00								
	10/18/2019 Hayes, Charles C.	Draft memorandum analyzing California trade secrets privilege.	\$380	1.9		\$722.00								
	10/19/2019 Hayes, Charles C.	Research trade secret privilege in California.	\$380	1.8		\$684.00								
	10/19/2019 Hayes, Charles C.	Draft memorandum as to the definition of trade secret and its application to the Sunrise staffing formula.	\$380	1.8		\$684.00								
	10/20/2019 Hayes, Charles C.	Research trade secrets privilege in California.	\$380	0.3		\$114.00								
	10/21/2019 Cocchia, Robert A.	Review legal research regarding trade secrets issue.	\$745	1.5		\$1,117.50								
	10/21/2019 Cocchia, Robert A.	Draft meet and confer correspondence and motion to compel further production of documents, set one.	\$745	2.8		\$2,086.00								
	10/21/2019 Hayes, Charles C.	Draft memorandum on trade secrets privilege in California.	\$380	4.3		\$1,634.00								
	10/22/2019 Cocchia, Robert A.	Continue research regarding motion to compel further responses to request for production of documents and draft motion regarding same.	\$745	2.2		\$1,639.00								
	10/23/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding discovery strategy and pending issues.	\$745	0.4		\$298.00								
	10/23/2019 Cocchia, Robert A.	Draft e-mail to opposing counsel regarding Belaire-West notice and ESI protocol.	\$745	0.1		\$74.50								
	10/23/2019 Cocchia, Robert A.	Review document production to date for preparation of motion to compel further production.	\$745	2.5		\$1,862.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	10/23/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery status.	\$830	0.2		\$166.00								
	10/24/2019 Cocchia, Robert A.	Review status of DSS production.	\$745	0.4		\$298.00								
	10/24/2019 Cocchia, Robert A.	Continue drafting proposed meet and confer correspondence regarding defendant's failure to produce documents and legal research regarding same.	\$745	2.1		\$1,564.50								
	10/24/2019 Healey, Christopher J.	Prepare correspondence to team regarding call and agenda and correspondence with Attorney Stebner regarding schedule.	\$830	0.1		\$83.00								
	10/25/2019 Cocchia, Robert A.	Review opposing counsel's proposed revisions to Belaire-West notice.	\$745	0.2		\$149.00								
	10/25/2019 Cocchia, Robert A.	Draft comments regarding revisions to Belaire-West notice.	\$745	0.3		\$223.50								
	10/25/2019 Cocchia, Robert A.	Draft e-mail to Attorney Healey regarding same.	\$745	0.1		\$74.50								
	10/25/2019 Cocchia, Robert A.	Draft meet and confer letter regarding request for production, set 1.	\$745	3.1		\$2,309.50								
	10/25/2019 Cocchia, Robert A.	Draft revisions to Belaire-West notice.	\$745	0.3		\$223.50								
	10/25/2019 Cocchia, Robert A.	Draft e-mail to opposing counsel regarding same.	\$745	0.1		\$74.50								
	10/25/2019 Healey, Christopher J.	Review and comment regarding Belaire West notice and related issues.	\$830	0.2		\$166.00								
	10/28/2019 Cocchia, Robert A.	Review and exchange e-mail message regarding Defendant's production of documents and access to same.	\$745	0.3		\$223.50								
	10/28/2019 Cocchia, Robert A.	Brief review of Defendant's 10/28/19 production of documents.	\$745	0.9		\$670.50								
	10/28/2019 Healey, Christopher J.	Conference call with team regarding status.	\$830	0.3		\$249.00			0.3	249.00				
	10/28/2019 Myrick, Tracy R.	Download defendant production and provide link to caseteam.	\$195	0.4		\$78.00								
	10/29/2019 Cocchia, Robert A.	Review status of DSS subpoena production.	\$745	0.2		\$149.00								
	10/29/2019 Cocchia, Robert A.	Draft outline for motion to compel further responses to request for production of documents, set one.	\$745	1.4		\$1,043.00								
	10/29/2019 Cocchia, Robert A.	Review final draft of Belaire-West notice.	\$745	0.1		\$74.50								
	10/30/2019 Cocchia, Robert A.	Continue rough outline for motion to compel further responses to request for production of documents, set one.	\$745	0.5		\$372.50								
	10/30/2019 Cocchia, Robert A.	Conference with Attorney Hayes regarding draft of motion to compel and pull materials for preparation of same.	\$745	0.8		\$596.00								
	10/30/2019 Cocchia, Robert A.	Review Defendant's production of documents on 10/28/19 regarding training on Sunrise assessment protocol	\$745	3		\$2,235.00								
	10/30/2019 Hayes, Charles C.	Review documents in preparation for drafting motion to compel.	\$380	1.6		\$608.00								
	10/30/2019 Hayes, Charles C.	Conference with Attorney Cocchia about motion to compel.	\$380	0.9		\$342.00								
	10/30/2019 Hayes, Charles C.	Research class discovery and meet and confer requirement, and prepare to draft motion to compel production of documents.	\$380	2.9		\$1,102.00								
	10/31/2019 Cocchia, Robert A.	Conference with Attorney Hayes regarding discovery motion.	\$745	0.3		\$223.50								
	10/31/2019 Cocchia, Robert A.	Review Court's order regarding contact information for class members.	\$745	0.3		\$223.50								
	10/31/2019 Cocchia, Robert A.	Continue review of documents produced by Sunrise for purposes of streamlining motion to compel further production.	\$745	2.5		\$1,862.50								
	10/31/2019 Healey, Christopher J.	Review Magistrate's discovery order.	\$830	0.1		\$83.00								
	10/31/2019 Hayes, Charles C.	Draft motion to compel production of documents.	\$380	3.7		\$1,406.00								
	11/1/2019 Healey, Christopher J.	Review magistrate discovery order.	\$830	0.1		\$83.00								
	11/1/2019 Hayes, Charles C.	Draft motion to compel production of documents.	\$380	1.5		\$570.00								
	11/2/2019 Hayes, Charles C.	Draft motion to compel production of documents.	\$380	4.1		\$1,558.00								
	11/3/2019 Hayes, Charles C.	Draft motion for production of documents.	\$380	1.6		\$608.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	11/4/2019 Cocchia, Robert A.	Review and exchange e-mails regarding administrator for Belaire-West notice and production of documents by DSS.	\$745	0.5									
	11/4/2019 Cocchia, Robert A.	Review Sunrise document productions.	\$745	1.5	\$1,117.50								
	11/4/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding status.	\$830	0.1	\$83.00								
	11/4/2019 Healey, Christopher J.	Prepare agenda for conference call and prepare correspondence regarding fee application research.	\$830	0.1	\$83.00								
	11/5/2019 Cocchia, Robert A.	Review position on Belaire-West issues for further discussion with opposing counsel.	\$745	0.4	\$298.00								
	11/5/2019 Cocchia, Robert A.	Conference with Attorney Hayes regarding draft motion to compel further responses to production of documents, Set 1.	\$745	0.2	\$149.00								
	11/5/2019 Cocchia, Robert A.	Pull materials for exhibits for same.	\$745	1	\$745.00								
	11/5/2019 Healey, Christopher J.	Draft agenda regarding team call.	\$830	0.1	\$83.00								
	11/5/2019 Hayes, Charles C.	Draft motion to compel production of documents.	\$380	4.3	\$1,634.00								
	11/6/2019 Hayes, Charles C.	Draft motion to compel production of documents.	\$380	7	\$2,660.00								
	11/7/2019 Healey, Christopher J.	Telephone conference with team regarding status and tactics.	\$830	0.2	\$166.00			0.2	166.00				
	11/7/2019 Hayes, Charles C.	Draft motion to compel production of documents.	\$380	3.7	\$1,406.00								
	11/8/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding status of discovery disputes and protective order issues.	\$745	0.2	\$149.00								
	11/8/2019 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel regarding status of ESI protocol agreement.	\$745	0.2	\$149.00								
	11/8/2019 Cocchia, Robert A.	Review and exchange e-mails with Attorney Kawamoto regarding status of DSS production and review same.	\$745	0.4	\$298.00								
	11/8/2019 Cocchia, Robert A.	Revise draft motion to compel production of documents (RFP Set 1).	\$745	2.3	\$1,713.50								
	11/8/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding case status and discovery.	\$830	0.2	\$166.00								
	11/9/2019 Cocchia, Robert A.	Draft e-mail to Attorney Healey regarding status of discovery issues.	\$745	0.3	\$223.50								
	11/9/2019 Cocchia, Robert A.	Revise draft motion to compel production of documents, RFP (set one).	\$745	1.2	\$894.00								
	11/11/2019 Cocchia, Robert A.	Revise draft motion to compel production of documents and reviewed current production regarding same.	\$745	2.5	\$1,862.50								
	11/11/2019 Healey, Christopher J.	Outline agenda for team call.	\$830	0.1	\$83.00								
	11/13/2019 Cocchia, Robert A.	Finalize first draft of motion to compel further responses to request for production of documents, set one and forward same to Attorney Healey.	\$745	4.8	\$3,576.00								
	11/13/2019 Healey, Christopher J.	Prepare correspondence to team regarding expert cost issues.	\$830	0.1	\$83.00								
	11/14/2019 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel regarding Belaire-West notice.	\$745	0.2	\$149.00								
	11/14/2019 Cocchia, Robert A.	Began review of DSS production, set one.	\$745	1.5	\$1,117.50								
	11/14/2019 Cocchia, Robert A.	Review and exchange e-mails with Attorney Kawamoto regarding DSS production.	\$745	0.2	\$149.00								
	11/14/2019 Cocchia, Robert A.	Review and exchange e-mails with Attorney Healey regarding Belaire-West notice.	\$745	0.1	\$74.50								
	11/14/2019 Healey, Christopher J.	Prepare correspondence to team regarding conference call and follow-up correspondence regarding same.	\$830	0.2	\$166.00								
	11/14/2019 Healey, Christopher J.	Review and revise draft motion to compel regarding document requests.	\$830	5	\$4,150.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>					
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>		
						Hrs	Fees	Hrs	Fees	Hrs	Fees	
	11/15/2019 Cocchia, Robert A.	Team conference call regarding strategy and upcoming deadlines.	\$745	0.4	\$298.00				0.4	298.00		
	11/15/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding motion to compel further production of documents.	\$745	2	\$1,490.00							
	11/15/2019 Cocchia, Robert A.	Further research regarding motion to compel further production of documents.	\$745	1.6	\$1,192.00							
	11/15/2019 Cocchia, Robert A.	Review draft Belaire-West notice and e-mail to Attorney Healey regarding same.	\$745	0.2	\$149.00							
	11/15/2019 Cocchia, Robert A.	Review redaction privilege log produced by opposing counsel for DSS documents and review related documents.	\$745	0.2	\$149.00							
	11/15/2019 Healey, Christopher J.	Prepare for team call	\$830	0.2	\$166.00							
	11/15/2019 Healey, Christopher J.	Conference call with team regarding status and tactics.	\$830	0.4	\$332.00			0.4	332.00			
	11/15/2019 Healey, Christopher J.	Revise motion to compel discovery (RFP, set one).	\$830	1.8	\$1,494.00							
	11/15/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding motion to compel.	\$830	1.5	\$1,245.00							
	11/15/2019 Healey, Christopher J.	Review and exchange e-mails with Attorney Healey regarding meet and confer communications with opposing counsel regarding request for production, set one, and pulled written communications regarding same.	\$830	1.5	\$1,245.00							
	11/16/2019 Cocchia, Robert A.	Review motion to compel (RFAs, set one).	\$830	1.4	\$1,162.00							
	11/16/2019 Healey, Christopher J.	Prepare correspondence regarding sample protocol.	\$830	0.2	\$166.00							
	11/16/2019 Healey, Christopher J.	Correspondence regarding expert fees, correspondence regarding Fee Sharing issue and correspondence regarding to-do items regarding defendant's staffing expert.	\$830	0.2	\$166.00							
	11/17/2019 Healey, Christopher J.	Revise motion to compel.	\$830	4	\$3,320.00							
	11/17/2019 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location.	\$195	0.7	\$136.50							
	11/17/2019 Myrick, Tracy R.	Upload defendant supplemental production to shared drive.	\$195	0.1	\$19.50							
	11/18/2019 Cocchia, Robert A.	Conference with Attorneys Healey and Hayes regarding strategy for class certification and discovery arguments regarding same.	\$745	0.7	\$521.50							
	11/18/2019 Cocchia, Robert A.	Review and exchange e-mails with team regarding review of recently produced documents.	\$745	0.4	\$298.00							
	11/18/2019 Cocchia, Robert A.	Analysis of trade secret research.	\$745	0.7	\$521.50							
	11/18/2019 Cocchia, Robert A.	Review defendant's production for identification of staffing policy documents.	\$745	1	\$745.00							
	11/18/2019 Cocchia, Robert A.	E-mail Attorney Healey regarding same.	\$745	0.1	\$74.50							
	11/18/2019 Cocchia, Robert A.	Review team's revisions to motion to compel production of documents.	\$745	0.6	\$447.00							
	11/18/2019 Healey, Christopher J.	Prepare for team meeting.	\$830	0.2	\$166.00							
	11/18/2019 Healey, Christopher J.	Meet with Dentons' team regarding motion to compel.	\$830	1	\$830.00							
	11/18/2019 Healey, Christopher J.	Revise motion to compel.	\$830	3.6	\$2,988.00							
	11/18/2019 Healey, Christopher J.	Telephone conference with Attorney Marks regarding cost issues.	\$830	0.2	\$166.00							
	11/18/2019 Hayes, Charles C.	Conference with Attorneys Cocchia and Healey about motion to compel production of documents.	\$380	0.8	\$304.00							
	11/18/2019 Hayes, Charles C.	Research trade secret protections in California.	\$380	0.9	\$342.00							
	11/19/2019 Cocchia, Robert A.	Review edits to ESI protocol and review.	\$745	0.6	\$447.00							
	11/19/2019 Cocchia, Robert A.	Exchange e-mails with Attorney Johnson and opposing counsel regarding same.	\$745	0.1	\$74.50							

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	11/19/2019 Cocchia, Robert A.	Review joint statement to court regarding Belaire-West notice.	\$745	0.1		\$74.50									
	11/19/2019 Cocchia, Robert A.	Draft revisions to motion to compel production of documents and compile comprehensive declaration regarding meet and confer efforts.	\$745	3.6		\$2,682.00									
	11/19/2019 Healey, Christopher J.	Prepare for team call.	\$830	0.1		\$83.00									
	11/19/2019 Healey, Christopher J.	Prepare correspondence to team regarding ProModel costs.	\$830	0.1		\$83.00									
	11/19/2019 Healey, Christopher J.	Follow-up correspondence regarding expert cost issues.	\$830	0.1		\$83.00									
	11/19/2019 Healey, Christopher J.	Telephone conference with co-counsel regarding expert costs and fee share issues.	\$830	0.2		\$166.00				0.2	166.00				
	11/19/2019 Healey, Christopher J.	Follow-up correspondence regarding same.	\$830	0.1		\$83.00									
	11/19/2019 Healey, Christopher J.	Review background material on Brookdale trade secret arguments.	\$830	1		\$830.00									
	11/19/2019 Healey, Christopher J.	Prepare correspondence regarding research leads on trade secret issues.	\$830	0.2		\$166.00									
	11/19/2019 Healey, Christopher J.	Revise draft motion to compel.	\$830	2.9		\$2,407.00									
	11/19/2019 Healey, Christopher J.	Research regarding trade secret issue.	\$830	0.5		\$415.00									
	11/19/2019 Healey, Christopher J.	Correspondence regarding same.	\$830	0.2		\$166.00									
	11/19/2019 Hayes, Charles C.	Research trade secret law in California as it applies in federal court.	\$380	5.6		\$2,128.00			2	760.00					
	11/19/2019 Hayes, Charles C.	Send research request to Carmen Valero on Trade Secrets issues.	\$380	0.2		\$76.00									
	11/20/2019 Cocchia, Robert A.	Review prior correspondence regarding outstanding discovery requests.	\$745	1.1		\$819.50									
	11/20/2019 Cocchia, Robert A.	Draft e-mail to opposing counsel regarding same.	\$745	0.1		\$74.50									
	11/20/2019 Cocchia, Robert A.	Conference with Attorney Hayes regarding response to joint statement regarding protective order.	\$745	0.3		\$223.50									
	11/20/2019 Cocchia, Robert A.	Draft declaration in support of motion to compel further responses to request for production, set one.	\$745	1.3		\$968.50									
	11/20/2019 Cocchia, Robert A.	Review defendant's document production regarding incomplete information on damages and complaints.	\$745	0.8		\$596.00									
	11/20/2019 Cocchia, Robert A.	Analysis of Judge Early's protective orders and trade secret research from Attorney Hayes.	\$745	1.1		\$819.50									
	11/20/2019 Cocchia, Robert A.	Review and approve final Belaire-West notice.	\$745	0.2		\$149.00									
	11/20/2019 Cocchia, Robert A.	Exchange e-mails with third party administrator regarding same.	\$745	0.1		\$74.50									
	11/20/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery issues.	\$830	0.2		\$166.00									
	11/20/2019 Healey, Christopher J.	Revise motion to compel.	\$830	3		\$2,490.00									
	11/20/2019 Hayes, Charles C.	Prepare research memo for Attorney Healey on trade secret issue.	\$380	7.7		\$2,926.00			2	760.00					
	11/20/2019 Hayes, Charles C.	Conference with Attorney Cocchia about next steps.	\$380	0.2		\$76.00									
	11/20/2019 Hayes, Charles C.	Conference with Attorney Healey about research.	\$380	0.2		\$76.00									
	11/20/2019 Hayes, Charles C.	Review documents for Sunrise joint statement.	\$380	0.3		\$114.00									
	11/21/2019 Cocchia, Robert A.	Review and revise joint statement regarding protective order and review caselaw regarding same.	\$745	2.1		\$1,564.50									
	11/21/2019 Cocchia, Robert A.	Finalize draft omnibus declaration regarding ongoing meet and confer efforts with opposing counsel.	\$745	1.3		\$968.50									
	11/21/2019 Cocchia, Robert A.	Review and exchange e-mails with team regarding discovery status.	\$745	0.2		\$149.00									

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	11/21/2019 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding schedule and related issues.	\$830	0.2	\$166.00								
	11/21/2019 Healey, Christopher J.	Revise motion to compel discovery responses.	\$830	6.2	\$5,146.00	1	830.00						
	11/21/2019 Hayes, Charles C.	Draft joint statement regarding protective order.	\$380	6.5	\$2,470.00								
	11/21/2019 Hayes, Charles C.	Research trade secret law.	\$380	1	\$380.00								
	11/22/2019 Cocchia, Robert A.	Review and revise draft joint statement regarding protective order to be filed with the Court.	\$745	1.3	\$968.50								
	11/22/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding discovery issues.	\$745	0.3	\$223.50								
	11/22/2019 Cocchia, Robert A.	Participate in team conference call regarding strategy and issues for class certification.	\$745	0.3	\$223.50								
	11/22/2019 Cocchia, Robert A.	Review edits to motion to compel from Attorney Healey and continued revisions to same.	\$745	2.4	\$1,788.00								
	11/22/2019 Healey, Christopher J.	Revise draft brief regarding motion to compel.	\$830	3.5	\$2,905.00	1	830.00						
	11/22/2019 Healey, Christopher J.	Prepare for conference call	\$830	0.1	\$83.00								
	11/22/2019 Healey, Christopher J.	Conference call with team regarding status and tactics.	\$830	0.2	\$166.00			0.2	166.00				
	11/24/2019 Healey, Christopher J.	Correspondence regarding team staffing issues.	\$830	0.2	\$166.00								
	11/25/2019 Cocchia, Robert A.	Review comments and revisions to motion to compel from Attorney Healey and incorporate same into brief.	\$745	1.4	\$1,043.00								
	11/25/2019 Cocchia, Robert A.	Further research regarding trade secret issues for motion to compel.	\$745	2.7	\$2,011.50								
	11/25/2019 Healey, Christopher J.	Prepare to-do list for call with Attorney Warren.	\$830	0.2	\$166.00								
	11/25/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding document review.	\$830	0.2	\$166.00								
	11/25/2019 Healey, Christopher J.	Review and comment on protective order.	\$830	0.8	\$664.00								
	11/25/2019 Healey, Christopher J.	Review key documents.	\$830	0.3	\$249.00								
	11/25/2019 Healey, Christopher J.	Revise joint statement regarding motion to compel (RFPs, Set One).	\$830	0.1	\$83.00								
	11/25/2019 Healey, Christopher J.	Telephone conference with Attorney Warren regarding potential participation in case.	\$830	0.2	\$166.00								
	11/25/2019 Healey, Christopher J.	Review and revise motion to compel.	\$830	0.2	\$166.00								
	11/25/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding motion to compel brief.	\$830	0.5	\$415.00								
	11/25/2019 Healey, Christopher J.	Office conference with Dentons' team regarding same.	\$830	0.3	\$249.00								
	11/25/2019 Hayes, Charles C.	Conference with Attorneys Cocchia and Healey about motion to compel production of documents.	\$380	0.3	\$114.00								
	11/26/2019 Cocchia, Robert A.	Draft revisions to motion to compel and declaration in support of same.	\$745	4.4	\$3,278.00								
	11/26/2019 Healey, Christopher J.	Correspondence with Attorney Warren regarding engagement issues.	\$830	0.2	\$166.00								
	11/26/2019 Healey, Christopher J.	Draft Attorney Warren engagement letter.	\$830	0.2	\$166.00								
	11/26/2019 Healey, Christopher J.	Correspondence with Attorney Warren regarding background materials.	\$830	0.5	\$415.00								
	11/26/2019 Healey, Christopher J.	Prepare correspondence regarding Defendant depositions.	\$830	0.1	\$83.00								
	11/26/2019 Healey, Christopher J.	Follow-up correspondence regarding Attorney Warren engagement agreement.	\$830	0.3	\$249.00								
	11/26/2019 Healey, Christopher J.	Review and revise motion to compel.	\$830	0.5	\$415.00								
	11/26/2019 Healey, Christopher J.	Correspondence regarding Attorney Marks' changes to motion to compel.	\$830	0.3	\$249.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	11/26/2019 Myrick, Tracy R.	Download defendant production and provide location to caseteam.	\$195	0.3		\$58.50								
	11/27/2019 Cocchia, Robert A.	Revise joint statement regarding protective order and forward same to opposing counsel.	\$745	0.8		\$596.00								
	11/27/2019 Cocchia, Robert A.	Analyze defendant's production of documents regarding job codes and job descriptions and need for further production.	\$745	2.7		\$2,011.50								
	11/27/2019 Cocchia, Robert A.	Revise draft motion to compel production of documents and declarations in support.	\$745	3.5		\$2,607.50								
	11/27/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding motion to compel brief.	\$830	0.1		\$83.00								
	11/27/2019 Healey, Christopher J.	Correspondence regarding Attorney Warren engagement.	\$830	0.2		\$166.00								
	11/27/2019 Healey, Christopher J.	Correspondence with Wallace firm regarding discovery to-do items.	\$830	0.2		\$166.00								
	11/27/2019 Healey, Christopher J.	Prepare correspondence to Attorney Thamer regarding deposition outlines.	\$830	0.1		\$83.00								
	11/27/2019 Healey, Christopher J.	Revise motion to compel opposition.	\$830	0.5		\$415.00								
	11/27/2019 Healey, Christopher J.	Prepare correspondence regarding same.	\$830	0.1		\$83.00								
	11/27/2019 Healey, Christopher J.	Office conference regarding motion to dismiss opposition.	\$830	0.1		\$83.00								
	11/27/2019 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding same.	\$830	0.1		\$83.00								
	11/28/2019 Healey, Christopher J.	Prepare to-do list regarding discovery and class motion.	\$830	0.1		\$83.00								
	12/2/2019 Cocchia, Robert A.	Revise motion to compel further production of documents and declarations in support of same.	\$745	2.9		\$2,160.50								
	12/2/2019 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel regarding production of documents.	\$745	0.2		\$149.00								
	12/2/2019 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding status.	\$830	0.1		\$83.00								
	12/2/2019 Healey, Christopher J.	Prepare correspondence regarding deposition notice of executive directors.	\$830	0.1		\$83.00								
	12/2/2019 Healey, Christopher J.	Prepare correspondence regarding motion to compel brief.	\$830	0.1		\$83.00								
	12/2/2019 Healey, Christopher J.	Review documents.	\$830	3.6		\$2,988.00								
	12/2/2019 Healey, Christopher J.	Telephone conference regarding motion to compel brief.	\$830	0.2		\$166.00								
	12/2/2019 Healey, Christopher J.	Review changes to motion to compel brief.	\$830	0.2		\$166.00								
	12/2/2019 Healey, Christopher J.	Prepare correspondence regarding team call and outline to-do list.	\$830	0.1		\$83.00								
	12/2/2019 Healey, Christopher J.	Finalize joint statement for motion to compel production of documents, set one, and declarations and exhibits in support of same, and forward to opposing counsel by e-mail.	\$830	0.1		\$83.00								
	12/3/2019 Cocchia, Robert A.	Finalize and serve deposition notices for director's of plaintiffs' facilities.	\$745	5.5		\$4,097.50								
	12/3/2019 Cocchia, Robert A.	Finalize and serve deposition notices for director's of plaintiffs' facilities.	\$745	0.2		\$149.00								
	12/3/2019 Healey, Christopher J.	Revise Marks' supporting declaration to motion to compel.	\$830	0.5		\$415.00								
	12/3/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.1		\$83.00								
	12/3/2019 Healey, Christopher J.	Review and revise deposition notice regarding Executive Directors.	\$830	0.1		\$83.00								
	12/3/2019 Healey, Christopher J.	Telephone conference with Attorney Cocchia.	\$830	0.2		\$166.00								
	12/3/2019 Healey, Christopher J.	Review correspondence regarding motion to compel filing.	\$830	0.1		\$83.00								
	12/3/2019 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding motion to compel brief.	\$830	0.1		\$83.00								
	12/3/2019 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery issues.	\$830	0.1		\$83.00								
	12/3/2019 Healey, Christopher J.	Draft agenda for conference call.	\$830	0.2		\$166.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>					
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>	<u>Fees</u>
							Hrs	Fees	Hrs	Fees	Hrs	Fees
	12/3/2019 Healey, Christopher J.	Prepare for conference call	\$830	0.1		\$83.00						
	12/3/2019 Healey, Christopher J.	Conference call with team re discovery issues	\$830	0.3		\$249.00						
	12/3/2019 Hayes, Charles C.	Revise motion to compel production of documents.	\$380	1.6		\$608.00			0.3	249.00		
	12/4/2019 Cocchia, Robert A.	Review and approve joint stipulation regarding entry of protective order.	\$745	0.3		\$223.50						
	12/4/2019 Cocchia, Robert A.	Exchange e-mails with opposing counsel regarding same.	\$745	0.1		\$74.50						
	12/4/2019 Cocchia, Robert A.	Review and exchange e-mails with Attorney Johnson regarding status of discussions on ESI protocol.	\$745	0.2		\$819.50						
	12/4/2019 Cocchia, Robert A.	Review documents from defendant's production identified as relevant to staffing analysis and review Attorney Healey's notes regarding same.	\$745	1.1		\$819.50						
	12/4/2019 Cocchia, Robert A.	Review and exchange e-mails with third party administrator regarding final Belaire-West notice and circulated same to team.	\$745	0.3		\$223.50						
	12/4/2019 Cocchia, Robert A.	Telephone conference with third party counsel regarding related claims against Sunrise.	\$745	0.5		\$372.50						
	12/4/2019 Healey, Christopher J.	Correspondence regarding Sunrise production.	\$830	0.3		\$249.00						
	12/4/2019 Healey, Christopher J.	Prepare correspondence to team regarding document review.	\$830	0.2		\$166.00						
	12/4/2019 Healey, Christopher J.	Prepare correspondence to Attorney Marks and team regarding key Sunrise documents.	\$830	0.5		\$415.00						
	12/4/2019 Healey, Christopher J.	Follow-up correspondence regarding same.	\$830	0.3		\$249.00						
	12/4/2019 Healey, Christopher J.	Office conference regarding follow-up research regarding reply brief.	\$830	0.1		\$83.00						
	12/4/2019 Healey, Christopher J.	Research and analysis regarding expert challenge.	\$830	0.5		\$415.00						
	12/4/2019 Healey, Christopher J.	Prepare correspondence regarding Sunrise staffing approach.	\$830	0.5		\$415.00						
	12/4/2019 Hayes, Charles C.	Research caselaw as to trade secret protection in California.	\$380	0.8		\$304.00						
	12/5/2019 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel regarding discovery motion and depositions.	\$745	0.2		\$149.00						
	12/5/2019 Cocchia, Robert A.	Review research from Attorney Hayes regarding trade secret privilege.	\$745	0.5		\$372.50						
	12/5/2019 Cocchia, Robert A.	Review documents regarding coding Sunrise's production and review.	\$745	0.3		\$223.50						
	12/5/2019 Cocchia, Robert A.	Exchange e-mails regarding same.	\$745	0.1		\$74.50						
	12/5/2019 Healey, Christopher J.	Correspondence with Attorney Cocchia regarding Defendants' discovery position.	\$830	0.1		\$83.00						
	12/5/2019 Healey, Christopher J.	Prepare correspondence to Attorney Thamer regarding deposition schedule.	\$830	0.1		\$83.00						
	12/5/2019 Healey, Christopher J.	Correspondence regarding document coding issues.	\$830	0.1		\$83.00						
	12/5/2019 Hayes, Charles C.	Research trade secret privilege in California.	\$380	1.7		\$646.00						
	12/6/2019 Cocchia, Robert A.	Prepare for and participate in meet and confer conference with opposing counsel regarding request for production, set one.	\$745	2.5		\$1,862.50						
	12/6/2019 Cocchia, Robert A.	Draft e-mail to team regarding results of meet and confer conference and strategy regarding same.	\$745	0.6		\$447.00						
	12/6/2019 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel regarding request for additional time to respond to joint statement regarding discovery disputes.	\$745	0.4		\$298.00						
	12/6/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding ESI and document production issues.	\$745	0.4		\$298.00						
	12/6/2019 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding discovery meet and confer.	\$830	0.2		\$166.00						

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	12/6/2019 Healey, Christopher J.	Correspondence regarding discovery issues.	\$830	0.2		\$166.00								
	12/6/2019 Healey, Christopher J.	Prepare correspondence regarding email production.	\$830	0.2		\$166.00								
	12/6/2019 Healey, Christopher J.	Prepare correspondence to team regarding Defendants' requests to continue deposition and motion to compel briefing.	\$830	0.2		\$166.00								
	12/6/2019 Healey, Christopher J.	Follow-up correspondence regarding same.	\$830	0.1		\$83.00								
	12/6/2019 Healey, Christopher J.	Review Attorney Cocchia report regarding meet and confer.	\$830	0.1		\$83.00								
	12/6/2019 Healey, Christopher J.	Response regarding same.	\$830	0.1		\$83.00								
	12/6/2019 Healey, Christopher J.	Revise correspondence to Gibson regarding further extension.	\$830	0.2		\$166.00								
	12/6/2019 Healey, Christopher J.	Correspondence with Attorney Thamer regarding document review questions.	\$830	0.1		\$83.00								
	12/9/2019 Healey, Christopher J.	Prepare correspondence regarding deposition preparation call.	\$830	0.1		\$83.00								
	12/9/2019 Healey, Christopher J.	Outline points for deposition preparation.	\$830	0.2		\$166.00								
	12/9/2019 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding case status.	\$830	0.1		\$83.00								
	12/10/2019 Cocchia, Robert A.	Review invoice from third party administrator re Belaire-West notice.	\$745	0.1		\$74.50								
	12/10/2019 Cocchia, Robert A.	Review notes regarding communications with putative class members.	\$745	0.4		\$298.00								
	12/10/2019 Cocchia, Robert A.	Review documents produced by Sunrise regarding daily labor reports and budgets and review.	\$745	1.2		\$894.00								
	12/10/2019 Cocchia, Robert A.	Exchange e-mails with team regarding same.	\$745	0.1		\$74.50								
	12/10/2019 Cocchia, Robert A.	Review memorandum regarding 2017 settlement meeting with Sunrise and comments regarding staffing made during same.	\$745	0.3		\$223.50								
	12/10/2019 Cocchia, Robert A.	Analysis of job descriptions produced by Sunrise.	\$745	0.5		\$372.50								
	12/10/2019 Cocchia, Robert A.	Draft e-mail to opposing counsel regarding missing documents.	\$745	0.1		\$74.50								
	12/10/2019 Cocchia, Robert A.	Review and exchange e-mails with team regarding deposition scheduling.	\$745	0.3		\$223.50								
	12/10/2019 Healey, Christopher J.	Outline deposition objectives and questions.	\$830	0.9		\$747.00								
	12/10/2019 Healey, Christopher J.	Correspondence regarding deposition schedule.	\$830	0.1		\$83.00								
	12/10/2019 Healey, Christopher J.	Correspondence regarding expert invoices.	\$830	0.1		\$83.00								
	12/10/2019 Healey, Christopher J.	Office conference regarding same.	\$830	0.1		\$83.00								
	12/10/2019 Healey, Christopher J.	Prepare for team call regarding depositions.	\$830	1		\$830.00								
	12/10/2019 Healey, Christopher J.	Conference call with team regarding deposition preparation.	\$830	1		\$830.00			1	830.00				
	12/10/2019 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding follow-up issues.	\$830	0.1		\$83.00								
	12/10/2019 Healey, Christopher J.	File review and correspondence regarding deposition preparation issues.	\$830	0.5		\$415.00								
	12/11/2019 Cocchia, Robert A.	Review research regarding communications with former Sunrise employees.	\$745	1.2		\$894.00								
	12/11/2019 Cocchia, Robert A.	Telephone conference with S. Brooks regarding interview of former Sunrise employee.	\$745	0.3		\$223.50								
	12/12/2019 Cocchia, Robert A.	Review protective order entered by Court.	\$745	0.6		\$447.00								
	12/12/2019 Cocchia, Robert A.	Draft e-mail to team regarding changes implemented by Judge Early.	\$745	0.1		\$74.50								
	12/12/2019 Cocchia, Robert A.	Review and exchange e-mails with team regarding search term list and custodians and status of discussions with opposing counsel on same.	\$745	0.5		\$372.50								
	12/12/2019 Cocchia, Robert A.	Draft e-mail to opposing counsel regarding deposition dates and complaint documents.	\$745	0.2		\$149.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	12/12/2019 Cocchia, Robert A.	Follow up with team regarding deposition scheduling.	\$745	0.2									
	12/12/2019 Cocchia, Robert A.	Continue review and tagging documents for ED depositions.	\$745	2.5									
	12/12/2019 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding protective order.	\$830	0.1									
	12/12/2019 Healey, Christopher J.	Prepare correspondence to Attorney Kennedy regarding same.	\$830	0.1									
	12/12/2019 Healey, Christopher J.	Prepare correspondence regarding deposition scheduling.	\$830	0.1									
	12/12/2019 Healey, Christopher J.	Review court protective order and related correspondence.	\$830	0.2									
	12/12/2019 Healey, Christopher J.	Correspondence regarding executive directors' depositions.	\$830	0.1									
	12/12/2019 Healey, Christopher J.	Correspondence regarding plaintiff's deposition.	\$830	0.1									
	12/12/2019 Healey, Christopher J.	Prepare correspondence regarding protective order ruling.	\$830	0.1									
	12/13/2019 Cocchia, Robert A.	Review and exchange multiple e-mails with opposing counsel and team regarding discovery issues.	\$745	0.8									
	12/13/2019 Cocchia, Robert A.	Prepare for and attend telephone conference with Attorney Johnson and Attorney Umpierre regarding search terms and ESI protocol.	\$745	1.1									
	12/13/2019 Cocchia, Robert A.	Review documents produced by Sunrise regarding resident complaints.	\$745	1.6									
	12/13/2019 Cocchia, Robert A.	Telephone conference with Attorney Healey regarding Sunrise discovery compromise offer.	\$745	0.2									
	12/13/2019 Healey, Christopher J.	Office conference regarding deposition preparation and exhibits.	\$830	0.1									
	12/13/2019 Healey, Christopher J.	Review defense request for extension on motion to compel brief.	\$830	0.1									
	12/13/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding same.	\$830	0.2									
	12/13/2019 Healey, Christopher J.	Draft proposed response.	\$830	0.2									
	12/13/2019 Healey, Christopher J.	Outline potential deposition questions.	\$830	0.1									
	12/14/2019 Healey, Christopher J.	Correspondence regarding Defendants' discovery position.	\$830	0.1									
	12/14/2019 Healey, Christopher J.	Revise response to Defendants' extension request.	\$830	0.1									
	12/16/2019 Cocchia, Robert A.	Review Sunrise's 12/16/19 production and review and exchange e-mails with co-counsel regarding same.	\$745	8									
	12/16/2019 Cocchia, Robert A.	Analyze Sunrise's proposed discovery compromise and conference with Attorney Healey regarding response to same.	\$745	1.1									
	12/16/2019 Cocchia, Robert A.	Draft correspondence to opposing counsel regarding motion to compel further responses to document requests.	\$745	0.8									
	12/16/2019 Cocchia, Robert A.	Continue review of complaint files produced by Sunrise.	\$745	1.5									
	12/16/2019 Healey, Christopher J.	Revise deposition preparation outline.	\$830	0.3									
	12/16/2019 Healey, Christopher J.	Prepare list of key documents for depositions.	\$830	1									
	12/16/2019 Healey, Christopher J.	Review Defendants' discovery position.	\$830	0.3									
	12/16/2019 Healey, Christopher J.	Office conferences with Attorney Cocchia regarding same.	\$830	0.3									
	12/16/2019 Healey, Christopher J.	Outline proposed response.	\$830	0.2									
	12/16/2019 Healey, Christopher J.	Revise response email to Sunrise.	\$830	0.9									
	12/16/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding same.	\$830	0.1									
	12/16/2019 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location.	\$195	0.3									
	12/16/2019 Myrick, Tracy R.	Gather key documents from defendant documents for Co-Counsel review per attorney C. Healey.	\$195	1									
	12/17/2019 Cocchia, Robert A.	Revise draft joint statement for motion to compel production of documents to reflect results of additional meet and confer.	\$745	1.5									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	12/17/2019 Cocchia, Robert A.	Revise declaration and supporting documents for same and forward to opposing counsel.	\$745	1.6		\$1,192.00								
	12/17/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding revisions to joint statement and status of document review and deposition preparations.	\$745	0.4		\$298.00								
	12/17/2019 Healey, Christopher J.	Review Defendants' response on motion to compel statement.	\$830	0.1		\$83.00								
	12/17/2019 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding depositions. Prepare correspondence regarding plaintiff depositions and preparation.	\$830	0.1		\$83.00								
	12/17/2019 Healey, Christopher J.	Correspondence with Attorney Warren regarding deposition preparation.	\$830	0.1		\$83.00								
	12/17/2019 Healey, Christopher J.	Correspondence regarding Sunrise documents.	\$830	0.1		\$83.00								
	12/17/2019 Healey, Christopher J.	Review Defendants' production no. 4 and prepare correspondence regarding same.	\$830	0.4		\$332.00								
	12/17/2019 Healey, Christopher J.	Review joint statement and outline modifications based on motion to compel.	\$830	0.5		\$415.00								
	12/17/2019 Healey, Christopher J.	Review financial information.	\$830	0.2		\$166.00								
	12/17/2019 Healey, Christopher J.	Prepare correspondence to Sunrise's counsel regarding same. Gather key documents from defendant documents for Co-Counsel review per attorney C. Healey.	\$830	0.1		\$83.00								
	12/17/2019 Myrick, Tracy R.	Work on extracting key documents from defendant documents per caseteam.	\$195	0.5		\$97.50								
	12/17/2019 Myrick, Tracy R.	Review and revise draft correspondence to opposing counsel regarding production of ESI.	\$195	1		\$195.00								
	12/18/2019 Cocchia, Robert A.	Draft e-mail to opposing counsel regarding deposition dates.	\$745	3		\$2,235.00								
	12/18/2019 Cocchia, Robert A.	Review and exchange multiple e-mails regarding status of discovery, ESI and depositions with team.	\$745	0.1		\$74.50								
	12/18/2019 Cocchia, Robert A.	Prepare correspondence regarding deposition scheduling.	\$745	0.5		\$372.50								
	12/18/2019 Healey, Christopher J.	Prepare correspondence regarding email production.	\$830	0.2		\$166.00								
	12/18/2019 Healey, Christopher J.	Review subpoena request for third party production issues and prepare correspondence to team regarding same.	\$830	0.1		\$83.00								
	12/18/2019 Healey, Christopher J.	Prepare for Attorney Warren meeting.	\$830	0.6		\$498.00								
	12/18/2019 Healey, Christopher J.	Meet with Attorney Warren regarding depositions and discovery. Telephone conferences with Attorney Thamer regarding depositions.	\$830	0.7		\$581.00								
	12/18/2019 Healey, Christopher J.	Correspondence with Sunrise's counsel regarding depositions.	\$830	2		\$1,660.00	1	830.00						
	12/18/2019 Healey, Christopher J.	Office conference regarding deposition preparation materials.	\$830	0.2		\$166.00								
	12/18/2019 Healey, Christopher J.	Work on creating individual pdfs of key documents.	\$830	0.1		\$83.00								
	12/18/2019 Myrick, Tracy R.	Provide hard copy and electronic version of additional key docs to C. Healey.	\$195	1.7		\$331.50								
	12/18/2019 Myrick, Tracy R.	Provide caseteam with link to location of key documents.	\$195	0.2		\$39.00								
	12/18/2019 Myrick, Tracy R.	Correspondence from defense counsel regarding deposition schedule.	\$195	0.1		\$19.50								
	12/19/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.1		\$83.00								
	12/19/2019 Healey, Christopher J.	Review and revise deposition notice.	\$830	0.1		\$83.00								
	12/19/2019 Healey, Christopher J.	Review and revise letter regarding email meet and confer.	\$830	0.2		\$166.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	12/20/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding status of defendant's document production and issues regarding same.	\$745	0.3		\$223.50									
	12/20/2019 Cocchia, Robert A.	Review e-mail correspondence from opposing counsel regarding revenue data.	\$745	0.2		\$149.00									
	12/20/2019 Cocchia, Robert A.	Analyze revenue spreadsheets produced by defendant.	\$745	0.8		\$596.00									
	12/20/2019 Healey, Christopher J.	Correspondence regarding revenue spreadsheet.	\$830	0.1		\$83.00									
	12/20/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding same.	\$830	0.1		\$83.00									
	12/20/2019 Healey, Christopher J.	Follow-up correspondence regarding revenue numbers.	\$830	0.3		\$249.00									
	12/20/2019 Healey, Christopher J.	Review Sunrise documents regarding revenue figures and analysis regarding same.	\$830	1		\$830.00									
	12/21/2019 Cocchia, Robert A.	Draft correspondence to Sunrise regarding production of documents	\$745	0.5		\$372.50									
	12/21/2019 Cocchia, Robert A.	Review and exchange e-mails with Attorney Healey regarding discovery motion.	\$745	0.2		\$149.00									
	12/21/2019 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding Monday discovery conference.	\$830	0.1		\$83.00									
	12/22/2019 Cocchia, Robert A.	Pulled materials in preparation for meet and confer with opposing counsel regarding revenues billed/collected.	\$745	0.5		\$372.50									
	12/22/2019 Cocchia, Robert A.	Draft e-mail to Attorney Healey regarding same.	\$745	0.1		\$74.50									
	12/23/2019 Cocchia, Robert A.	Prepare for and participate in meet and confer with opposing counsel regarding production of documents and revenue spreadsheets.	\$745	0.9		\$670.50									
	12/23/2019 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel and co-counsel regarding extension of time to respond to joint stipulation on motion to compel production of documents.	\$745	0.3		\$223.50									
	12/23/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding Sunrise's production of financial information.	\$745	0.3		\$223.50									
	12/23/2019 Cocchia, Robert A.	Review files regarding prior declarations filed by Sunrise in employment litigation.	\$745	1.2		\$894.00									
	12/23/2019 Cocchia, Robert A.	Review Sunrise's 12/23 production of documents.	\$745	1.7		\$1,266.50									
	12/23/2019 Cocchia, Robert A.	Analysis of revenue spreadsheet regarding Plaintiff's move-in fees.	\$745	0.5		\$372.50									
	12/23/2019 Healey, Christopher J.	Prepare for meet and confer call regarding financial discovery.	\$830	0.5		\$415.00									
	12/23/2019 Healey, Christopher J.	Telephone conference with Attorney Allyn regarding Sunrise financial information.	\$830	0.8		\$664.00									
	12/23/2019 Healey, Christopher J.	Follow-up correspondence with Attorney Cocchia regarding move-in fee issue.	\$830	0.2		\$166.00									
	12/23/2019 Healey, Christopher J.	Prepare correspondence to team regarding meet and confer regarding financial information.	\$830	0.6		\$498.00									
	12/23/2019 Healey, Christopher J.	Draft outline regarding executive director deposition preparation and correspondence to team.	\$830	0.5		\$415.00									
	12/23/2019 Healey, Christopher J.	Review Shiferaw docket and prepare correspondence regarding same.	\$830	0.2		\$166.00									
	12/23/2019 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Defendant's arguments.	\$830	0.1		\$83.00									
	12/23/2019 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location.	\$195	1		\$195.00									
	12/26/2019 Healey, Christopher J.	Correspondence regarding expert Flores compliance with protective order.	\$830	0.2		\$166.00									

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	12/27/2019 Cocchia, Robert A.	Analyze Sunrise's portion of joint statement on motion to compel further production of documents (Set One).	\$745	1.9	\$1,415.50								
	12/27/2019 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel regarding same.	\$745	0.1	\$74.50								
	12/27/2019 Healey, Christopher J.	Review Sunrise's opposition to motion to compel.	\$830	0.3	\$249.00								
	12/27/2019 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$830	0.1	\$83.00								
	12/27/2019 Healey, Christopher J.	Review Sunrise documents.	\$830	0.6	\$498.00								
	12/27/2019 Healey, Christopher J.	Prepare correspondence to Attorney Warren regarding document review plan.	\$830	0.1	\$83.00								
	12/27/2019 Healey, Christopher J.	Review Attorney Thamer's correspondence regarding named plaintiff files.	\$830	0.1	\$83.00								
	12/29/2019 Healey, Christopher J.	Correspondence regarding assessments issue to named plaintiffs.	\$830	0.2	\$166.00								
	12/29/2019 Healey, Christopher J.	Follow-up correspondence regarding team call.	\$830	0.1	\$83.00								
	12/30/2019 Cocchia, Robert A.	Download and analyze contact list provided by third party administrator.	\$745	0.6	\$447.00								
	12/30/2019 Cocchia, Robert A.	Review and exchange e-mails with team regarding Sunrise's documents for use at upcoming depositions and conferences with Attorney Healey regarding same.	\$745	1.5	\$1,117.50								
	12/30/2019 Cocchia, Robert A.	Analysis of files produced by Sunrise for staffing issues and management agreements.	\$745	0.5	\$372.50								
	12/30/2019 Healey, Christopher J.	Office conference with Attorney Cocchia regarding motion to dismiss reply.	\$830	0.2	\$166.00								
	12/30/2019 Healey, Christopher J.	Correspondence regarding Sunrise deposition.	\$830	0.2	\$166.00								
	12/30/2019 Healey, Christopher J.	Prepare for team call.	\$830	0.6	\$498.00								
	12/30/2019 Healey, Christopher J.	Conference call with team regarding executive director depositions.	\$830	0.8	\$664.00			0.8	664.00				
	12/30/2019 Healey, Christopher J.	Prepare correspondence to Gibson regarding Zach serve plan.	\$830	0.2	\$166.00								
	12/30/2019 Healey, Christopher J.	Outline calendar and key case dates.	\$830	0.1	\$83.00								
	12/31/2019 Cocchia, Robert A.	Analyze opposition to motion to compel production and begin drafting outlining for supplemental briefing.	\$745	1.7	\$1,266.50								
	12/31/2019 Cocchia, Robert A.	Conference with Attorney Healey regarding meet and confer on Request for Production of Documents (Set 2).	\$745	0.2	\$149.00								
	12/31/2019 Cocchia, Robert A.	Review and exchange e-mails with team regarding deposition preparation, review of documents and pending discovery issues.	\$745	0.8	\$596.00								
	12/31/2019 Cocchia, Robert A.	Analysis of Sunrise production and exchange e-mails with team regarding same.	\$745	0.7	\$521.50								
	12/31/2019 Cocchia, Robert A.	Finalize draft motion to compel and draft e-mail to opposing counsel regarding same.	\$745	1	\$745.00								
	12/31/2019 Healey, Christopher J.	Prepare correspondence regarding Sunrise policies.	\$830	0.2	\$166.00								
	12/31/2019 Healey, Christopher J.	Outline deposition objectives.	\$830	0.1	\$83.00								
	12/31/2019 Healey, Christopher J.	Review documents in Production 5 from Sunrise.	\$830	3	\$2,490.00								
	12/31/2019 Healey, Christopher J.	Prepare for Executive Director depositions.	\$830	1.7	\$1,411.00								
	12/31/2019 Healey, Christopher J.	Correspondence regarding deposition preparation.	\$830	0.2	\$166.00								
	12/31/2019 Healey, Christopher J.	Office conference regarding discovery meet and confer.	\$830	0.1	\$83.00								
	12/31/2019 Healey, Christopher J.	Prepare correspondence to defendant's counsel regarding document production.	\$830	0.1	\$83.00								
	12/31/2019 Healey, Christopher J.	Correspondence with team regarding document review.	\$830	0.2	\$166.00								
	12/31/2019 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding defendant's argument regarding assessment production.	\$830	0.1	\$83.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	12/31/2019 Healey, Christopher J.	Further correspondence regarding deposition preparation.	\$830	0.2		\$166.00								
	1/2/2020 Cocchia, Robert A.	Review draft notice of motion to compel further production of document (Set One).	\$780	0.2		\$156.00								
	1/2/2020 Cocchia, Robert A.	Review and exchange multiple e-mails regarding analysis of Sunrise's production of documents related to assessments and increased service levels and daily labor reports and analyzed documents produced regarding same.	\$780	2.3		\$1,794.00								
	1/2/2020 Cocchia, Robert A.	Finalize motion to compel for filing.	\$780	1.2		\$936.00								
	1/2/2020 Cocchia, Robert A.	Draft supplemental brief in support of motion to compel and conference with Attorney Healey regarding same.	\$780	0.8		\$624.00								
	1/2/2020 Healey, Christopher J.	Review correspondence from Attorney Thamer regarding deposition preparation.	\$870	0.2		\$174.00								
	1/2/2020 Healey, Christopher J.	Review documents, prepare for executive director depositions.	\$870	2.4		\$2,088.00								
	1/2/2020 Healey, Christopher J.	Prepare correspondence to team regarding Target Staffing formula.	\$870	0.5		\$435.00								
	1/2/2020 Healey, Christopher J.	Correspondence with defense counsel regarding Plan of Operation documents.	\$870	0.1		\$87.00								
	1/2/2020 Healey, Christopher J.	Review discovery requests.	\$870	0.1		\$87.00								
	1/2/2020 Healey, Christopher J.	Review defendant's position statement and outline reply points.	\$870	1.3		\$1,131.00								
	1/2/2020 Healey, Christopher J.	Office conference with Attorney Warren regarding deposition preparation.	\$870	0.5		\$435.00								
	1/2/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding reply brief.	\$870	0.2		\$174.00								
	1/2/2020 Healey, Christopher J.	Outline reply brief regarding motion to compel.	\$870	3.5		\$3,045.00								
	1/2/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1		\$87.00								
	1/2/2020 Healey, Christopher J.	Prepare correspondence to team regarding expert engagement issues.	\$870	0.2		\$174.00								
	1/3/2020 Cocchia, Robert A.	Telephone meet and confer with opposing counsel regarding Sunrise's production of documents.	\$780	0.4		\$312.00								
	1/3/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding meet and confer discussions with opposing counsel.	\$780	0.2		\$156.00								
	1/3/2020 Cocchia, Robert A.	Analysis of documents referenced by Sunrise for staffing formula and deficiencies regarding same.	\$780	2.4		\$1,872.00								
	1/3/2020 Healey, Christopher J.	Outline key issues for class motion.	\$870	0.2		\$174.00								
	1/3/2020 Healey, Christopher J.	Office conference regarding discovery issues.	\$870	0.1		\$87.00								
	1/3/2020 Healey, Christopher J.	Correspondence with Attorney Stebner regarding expert fees, review Healthcare Partners Lease, and telephone conference with Attorney Wallace regarding case staffing and related issues.	\$870	0.2		\$174.00								
	1/3/2020 Healey, Christopher J.	Prepare for Executive Director depositions.	\$870	0.3		\$261.00								
	1/3/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding meet and confer.	\$870	0.2		\$174.00								
	1/3/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding schedule issues.	\$870	0.2		\$174.00								
	1/3/2020 Healey, Christopher J.	Prepare correspondence to team.	\$870	0.1		\$87.00								
	1/3/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding Sunrise meet and confer.	\$870	0.2		\$174.00								
	1/3/2020 Healey, Christopher J.	Review documents and continue preparing for Executive Director depositions.	\$870	2.5		\$2,175.00								
	1/3/2020 Healey, Christopher J.	Correspondence to team regarding key documents.	\$870	0.3		\$261.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/4/2020 Healey, Christopher J.	Outline inserts to discovery reply brief.	\$870	0.2		\$174.00								
	1/4/2020 Healey, Christopher J.	Continue preparing for Executive Director depositions.	\$870	1.5		\$1,305.00								
	1/4/2020 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding Executive Director depositions.	\$870	1.1		\$957.00								
	1/4/2020 Healey, Christopher J.	Follow-up correspondence regarding Executive Director depositions and preparation.	\$870	0.5		\$435.00								
	1/5/2020 Healey, Christopher J.	Draft inserts to reply brief.	\$870	1		\$870.00								
	1/5/2020 Healey, Christopher J.	Revise discovery meet and confer correspondence.	\$870	0.5		\$435.00								
	1/6/2020 Cocchia, Robert A.	Review and exchange e-mails with Attorney Healey regarding meet and confer with opposing counsel.	\$780	0.2		\$156.00								
	1/6/2020 Cocchia, Robert A.	Revised correspondence regarding same.	\$780	0.4		\$312.00								
	1/6/2020 Cocchia, Robert A.	Revise supplemental memorandum in support of motion to compel production of documents.	\$780	1.8		\$1,404.00								
	1/6/2020 Cocchia, Robert A.	Prepare for and participate in telephone conference with opposing counsel regarding production of ESI.	\$780	0.7		\$546.00								
	1/6/2020 Cocchia, Robert A.	Review Sunrise's position on ESI requirements.	\$780	0.1		\$78.00								
	1/6/2020 Cocchia, Robert A.	Assist Attorney Healey in identification of documents for deposition of Executive Directors.	\$780	0.6		\$468.00								
	1/6/2020 Healey, Christopher J.	Review Attorney Thamer's deposition questions list.	\$870	0.2		\$174.00								
	1/6/2020 Healey, Christopher J.	Prepare correspondence to Gibson regarding missing documents.	\$870	0.1		\$87.00								
	1/6/2020 Healey, Christopher J.	Correspondence regarding email discovery.	\$870	0.1		\$87.00								
	1/6/2020 Healey, Christopher J.	Office conference regarding reply brief.	\$870	0.1		\$87.00								
	1/6/2020 Healey, Christopher J.	Prepare for executive director depositions.	\$870	1.9		\$1,653.00								
	1/6/2020 Healey, Christopher J.	Analysis regarding abstention issues and SEHA scoring document.	\$870	0.4		\$348.00								
	1/6/2020 Healey, Christopher J.	Office conference regarding email discovery issues.	\$870	0.3		\$261.00								
	1/6/2020 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location.	\$195	0.5		\$97.50								
	1/7/2020 Cocchia, Robert A.	Review Sunrise's 1/6/20 production of documents.	\$780	1.9		\$1,482.00								
	1/7/2020 Cocchia, Robert A.	Continue drafting supplemental brief in support of motion to compel.	\$780	2.6		\$2,028.00								
	1/7/2020 Cocchia, Robert A.	Telephone conference with counsel for potential fact witness and draft e-mail to team regarding same.	\$780	0.6		\$468.00								
	1/7/2020 Healey, Christopher J.	Travel to Orange County for Executive Director deposition.	\$870	1.5		\$1,305.00							1.5	1,305.00
	1/7/2020 Healey, Christopher J.	Prepare with Attorneys Thamer and Warren regarding Executive Director depositions.	\$870	1.5		\$1,305.00								
	1/7/2020 Healey, Christopher J.	Attend Executive Director depositions.	\$870	7.5		\$6,525.00	1	870.00						
	1/7/2020 Healey, Christopher J.	Return travel from Orange County from Executive Director deposition.	\$870	1.5		\$1,305.00							1.5	1,305.00
	1/7/2020 Healey, Christopher J.	Follow-up correspondence regarding Executive Director deposition.	\$870	0.2		\$174.00								
	1/7/2020 Healey, Christopher J.	Correspondence regarding Motion to Compel reply brief.	\$870	0.1		\$87.00								
	1/8/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding Executive Director depositions and supplemental brief in support of motion to compel.	\$780	0.4		\$312.00								
	1/8/2020 Cocchia, Robert A.	Analysis of prior filings by Sunrise regarding staffing in employment cases in preparation for deposition of Sunrise ED.	\$780	2.2		\$1,716.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/8/2020 Cocchia, Robert A.	Multiple telephone calls to follow up on additional fact witnesses.	\$780	0.5		\$390.00								
	1/8/2020 Cocchia, Robert A.	Continue drafting supplemental brief in support of motion to compel.	\$780	2		\$1,560.00								
	1/8/2020 Healey, Christopher J.	Outline to-do list.	\$870	0.2		\$174.00								
	1/8/2020 Healey, Christopher J.	Continue preparation for Executive Director deposition.	\$870	5.5		\$4,785.00								
	1/8/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding Executive Director deposition and reply brief.	\$870	0.2		\$174.00								
	1/8/2020 Healey, Christopher J.	Correspondence regarding former EE witnesses.	\$870	0.2		\$174.00								
	1/8/2020 Healey, Christopher J.	Draft correspondence to defendants' counsel regarding discovery issues.	\$870	0.6		\$522.00								
	1/8/2020 Healey, Christopher J.	Revise supplemental brief.	\$870	2.2		\$1,914.00								
	1/8/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding same.	\$870	0.1		\$87.00								
	1/9/2020 Cocchia, Robert A.	Finalize supplemental brief in support of motion to compel and filed same under seal pursuant to Central District Rules, review rough draft of Villanueva deposition transcript for same.	\$780	6.5		\$5,070.00								
	1/9/2020 Cocchia, Robert A.	Multiple conferences with Attorney Healey regarding preparation for ED deposition on 1/10/20.	\$780	0.6		\$468.00								
	1/9/2020 Cocchia, Robert A.	Review Sunrise target/actual staffing analysis produced by Sunrise.	\$780	0.2		\$156.00								
	1/9/2020 Healey, Christopher J.	Further revision to supplemental brief on motion to compel.	\$870	1.7		\$1,479.00								
	1/9/2020 Healey, Christopher J.	Prepare correspondence to counsel regarding same.	\$870	0.1		\$87.00								
	1/9/2020 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding reply brief.	\$870	0.2		\$174.00								
	1/9/2020 Healey, Christopher J.	Continue preparation for Executive Director deposition (San Rafael).	\$870	6.8		\$5,916.00								
	1/9/2020 Healey, Christopher J.	Prepare correspondence to defense counsel regarding discovery exhibits.	\$870	0.8		\$696.00								
	1/9/2020 Myrick, Tracy R.	Download relativity search results provided by Co-Counsel and provide caseteam with link to location.	\$195	0.2		\$39.00								
	1/9/2020 Myrick, Tracy R.	Assist attorneys with gathering documents to be used as exhibits for upcoming deposition.	\$195	4		\$780.00								
	1/10/2020 Cocchia, Robert A.	Analysis of supplemental brief filed by Sunrise in opposition to motion to compel production of documents and case law cited by Sunrise.	\$780	1.5		\$1,170.00								
	1/10/2020 Cocchia, Robert A.	Analysis of Sunrise 12/23 production regarding corporate oversight documents produced.	\$780	1.4		\$1,092.00								
	1/10/2020 Healey, Christopher J.	Continue preparing for Executive Director deposition.	\$870	1.5		\$1,305.00								
	1/10/2020 Healey, Christopher J.	Travel to Orange County for Executive Director deposition.	\$870	1.5		\$1,305.00							1.5	1,305.00
	1/10/2020 Healey, Christopher J.	Take deposition of Executive Director witness Abbie Apolinario.	\$870	9		\$7,830.00								
	1/10/2020 Healey, Christopher J.	Return travel from Orange County from deposition.	\$870	1.5		\$1,305.00							1.5	1,305.00
	1/10/2020 Healey, Christopher J.	Outline the points of Executive Director deposition.	\$870	0.3		\$261.00								
	1/11/2020 Cocchia, Robert A.	Review and exchange e-mails with team regarding outstanding discovery issues.	\$780	0.4		\$312.00								
	1/11/2020 Healey, Christopher J.	Correspondence regarding expert cost allocations.	\$870	0.1		\$87.00								
	1/11/2020 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding same.	\$870	0.1		\$87.00								
	1/11/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00								
	1/11/2020 Healey, Christopher J.	Review correspondence.	\$870	0.2		\$174.00								
	1/11/2020 Healey, Christopher J.	Prepare correspondence regarding ESI search terms.	\$870	0.2		\$174.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	1/12/2020 Healey, Christopher J.	Prepare correspondence regarding draft class certification motion.	\$870	0.1									
	1/12/2020 Healey, Christopher J.	Research regarding subpoena remedial repair.	\$870	0.1									
	1/12/2020 Healey, Christopher J.	Prepare correspondence regarding discovery delay.	\$870	0.1									
	1/12/2020 Healey, Christopher J.	Outline argument regarding discovery hearing.	\$870	0.2									
	1/12/2020 Healey, Christopher J.	Review deposition exhibits.	\$870	0.2									
	1/13/2020 Cocchia, Robert A.	Follow up on potential third party fact witnesses.	\$780	0.5									
	1/13/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding documents produced by Sunrise and documents still withheld and review production regarding same.	\$780	1.4									
	1/13/2020 Cocchia, Robert A.	Review Sunrise application to seal documents pertaining to discovery motion.	\$780	0.3									
	1/13/2020 Cocchia, Robert A.	Review summary of Executive Director depositions.	\$780	0.2									
	1/13/2020 Cocchia, Robert A.	Review and exchange e-mails regarding ESI and additional written discovery requests and review file regarding same.	\$780	1.4									
	1/13/2020 Healey, Christopher J.	Draft deposition summary correspondence.	\$870	0.7									
	1/13/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding deposition highlights.	\$870	0.2									
	1/13/2020 Healey, Christopher J.	Draft discovery to-do list.	\$870	1									
	1/14/2020 Cocchia, Robert A.	Multiple telephone calls with counsel for potential fact witness.	\$780	0.4									
	1/14/2020 Cocchia, Robert A.	Draft report of outstanding discovery issues and review file regarding same.	\$780	1.9									
	1/14/2020 Cocchia, Robert A.	Review JD Power survey results and exchange e-mails with team regarding same.	\$780	0.6									
	1/14/2020 Healey, Christopher J.	Review and comment on ESI meet and confer correspondence.	\$870	0.2									
	1/14/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding case status.	\$870	0.1									
	1/14/2020 Healey, Christopher J.	Draft Rule 30(b)(6) notice.	\$870	4.3				1	870.00				
	1/15/2020 Cocchia, Robert A.	Prepare for team conference call regarding case strategy.	\$780	0.1									
	1/15/2020 Cocchia, Robert A.	Attend team conference call regarding case strategy.	\$780	0.5						0.5	390.00		
	1/15/2020 Cocchia, Robert A.	Review rough deposition transcript for Ms. Apolinario.	\$780	0.8									
	1/15/2020 Cocchia, Robert A.	Review and exchange e-mails regarding third party document production.	\$780	0.2									
	1/15/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding same.	\$780	0.5									
	1/15/2020 Healey, Christopher J.	Prepare for team call.	\$870	0.5									
	1/15/2020 Healey, Christopher J.	Telephone conference with team regarding discovery and related issues.	\$870	0.5								0.5	435.00
	1/15/2020 Healey, Christopher J.	Outline to-do list.	\$870	0.2									
	1/15/2020 Healey, Christopher J.	Prepare correspondence regarding expert engagement.	\$870	0.1									
	1/15/2020 Healey, Christopher J.	Prepare correspondence regarding class member declaration and CCL records.	\$870	0.1									
	1/15/2020 Healey, Christopher J.	Revise 30(b)(6) deposition notice.	\$870	2.1									
	1/15/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding staffing analysis and related issues.	\$870	0.2									
	1/15/2020 Healey, Christopher J.	Outline request for admissions.	\$870	0.1									
	1/16/2020 Cocchia, Robert A.	Review DSS files produced by third party State of California.	\$780	0.8									
	1/16/2020 Cocchia, Robert A.	Review current production of documents.	\$780	0.7									
	1/16/2020 Cocchia, Robert A.	Draft e-mail to opposing counsel regarding RFP Nos. 35, 43-49 and 39-41 and status of production of responsive documents.	\$780	0.4									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/16/2020 Cocchia, Robert A.	Multiple telephone calls to potential third party witnesses and conference with Attorney Healey regarding same.	\$780	1		\$780.00								
	1/16/2020 Cocchia, Robert A.	Review draft 30(b)(6) notice.	\$780	0.3		\$234.00								
	1/16/2020 Cocchia, Robert A.	Review and exchange e-mails with third party administrator and accounting regarding payment of invoices.	\$780	0.4		\$312.00								
	1/16/2020 Cocchia, Robert A.	Analysis of budget spreadsheets produced by Sunrise.	\$780	1.5		\$1,170.00								
	1/16/2020 Cocchia, Robert A.	Brief conference with Attorney Healey regarding same and impact on current motion to compel.	\$780	0.3		\$234.00								
	1/16/2020 Healey, Christopher J.	Review correspondence regarding additional Sunrise production.	\$870	0.1		\$87.00								
	1/16/2020 Healey, Christopher J.	Review 30(b)(6) deposition notice.	\$870	0.6		\$522.00								
	1/16/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00								
	1/16/2020 Healey, Christopher J.	Review defendants' supplemental reply brief regarding motion to compel.	\$870	0.1		\$87.00								
	1/16/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery hearing.	\$870	0.3		\$261.00								
	1/16/2020 Healey, Christopher J.	Pull key documents.	\$870	0.2		\$174.00								
	1/16/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding hearing preparation.	\$870	0.8		\$696.00								
	1/16/2020 Healey, Christopher J.	Review and revise meet and confer letter regarding budget documents and market.	\$870	0.5		\$435.00								
	1/16/2020 Healey, Christopher J.	Prepare correspondence to defense counsel regarding Care Action management tool.	\$870	0.2		\$174.00								
	1/16/2020 Myrick, Tracy R.	Download third party and defendant productions and provide caseteam with link to locations.	\$195	1		\$195.00								
	1/16/2020 Myrick, Tracy R.	Gather various production documents and provide to C. Healey.	\$195	0.3		\$58.50								
	1/17/2020 Cocchia, Robert A.	Review draft correspondence to opposing counsel regarding ESI search.	\$780	0.2		\$156.00								
	1/17/2020 Cocchia, Robert A.	Review proposed list of search terms and review.	\$780	0.6		\$468.00								
	1/17/2020 Cocchia, Robert A.	Exchange e-mails with team regarding same.	\$780	0.1		\$78.00								
	1/17/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding discovery status and hearing on motion to compel production of documents.	\$780	0.3		\$234.00								
	1/17/2020 Cocchia, Robert A.	Prepare for hearing on motion to compel and review documents produced to date by Sunrise regarding same.	\$780	2.8		\$2,184.00								
	1/17/2020 Healey, Christopher J.	Finalize Rule 30(b)(6) deposition notice.	\$870	1.4		\$1,218.00								
	1/17/2020 Healey, Christopher J.	Prepare correspondence to defense counsel regarding deposition notice.	\$870	0.1		\$87.00								
	1/17/2020 Healey, Christopher J.	Correspondence regarding team call regarding Sunrise staffing information.	\$870	0.1		\$87.00								
	1/17/2020 Healey, Christopher J.	Outline class motion and review factual background.	\$870	1.5		\$1,305.00								
	1/17/2020 Healey, Christopher J.	Continue class certification motion outline.	\$870	1.2		\$1,044.00								
	1/17/2020 Myrick, Tracy R.	Create document production log and send link to caseteam.	\$195	1.5		\$292.50								
	1/18/2020 Healey, Christopher J.	Outline facts for class certification motion.	\$870	0.5		\$435.00								
	1/20/2020 Cocchia, Robert A.	Prepare telephone conference with team regarding analysis of current staffing information produced by Sunrise	\$780	0.3		\$234.00								
	1/20/2020 Cocchia, Robert A.	Prepare for and participate in telephone conference with team regarding analysis of current staffing information produced by Sunrise and gaps in same.	\$780	1.2		\$936.00			1.2	936.00				

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	1/20/2020 Cocchia, Robert A.	Review meet and confer correspondence from opposing counsel regarding Sunrise's refusal to produce Care Labor Management Tool and brief conference with Attorney Healey regarding same.	\$780	0.4	\$312.00								
	1/20/2020 Cocchia, Robert A.	Review notes of interview of former Sunrise ED.	\$780	0.2	\$156.00								
	1/20/2020 Healey, Christopher J.	Review email from Attorney Gorman regarding Daily Labor reporting information.	\$870	0.1	\$87.00								
	1/20/2020 Healey, Christopher J.	Correspondence from Attorney Warren regarding discovery issues.	\$870	0.1	\$87.00								
	1/20/2020 Healey, Christopher J.	Correspondence regarding ESI protocol.	\$870	0.1	\$87.00								
	1/20/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding meeting with former Sunrise executive director.	\$870	0.4	\$348.00								
	1/20/2020 Healey, Christopher J.	Correspondence regarding meet and confer issues.	\$870	0.1	\$87.00								
	1/20/2020 Healey, Christopher J.	Memorandum to file regarding same.	\$870	0.4	\$348.00								
	1/20/2020 Healey, Christopher J.	Telephone conference with team regarding staffing discovery issues.	\$870	1.2	\$1,044.00			1.2	1,044.00				
	1/20/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding last time studies and related issues.	\$870	0.3	\$261.00								
	1/21/2020 Cocchia, Robert A.	Prepare for hearing on motion to compel further production of documents, set one.	\$780	5.5	\$4,290.00								
	1/21/2020 Cocchia, Robert A.	Telephone conference with opposing counsel regarding production of documents referred to in Executive Director depositions.	\$780	0.2	\$156.00								
	1/21/2020 Cocchia, Robert A.	Review draft Request for Production of Documents, Set 4.	\$780	0.4	\$312.00								
	1/21/2020 Healey, Christopher J.	Prepare for discovery call.	\$870	0.3	\$261.00								
	1/21/2020 Healey, Christopher J.	Review correspondence regarding deposition scheduling.	\$870	0.1	\$87.00								
	1/21/2020 Healey, Christopher J.	Review Attorney Warren correspondence regarding additional discovery issues.	\$870	0.1	\$87.00								
	1/21/2020 Healey, Christopher J.	Follow-up regarding same.	\$870	0.1	\$87.00								
	1/21/2020 Healey, Christopher J.	Meet and confer call with Attorney Gorman regarding discovery issues.	\$870	0.3	\$261.00								
	1/21/2020 Healey, Christopher J.	Office conference with Attorneys Cocchia and Warren regarding follow-up discovery.	\$870	0.2	\$174.00								
	1/21/2020 Myrick, Tracy R.	Download deposition transcript and exhibits of Joseph Villaneuva and provide caseteam with link to location.	\$195	0.5	\$97.50								
	1/22/2020 Cocchia, Robert A.	Prepare for hearing on motion to compel production of documents.	\$780	4	\$3,120.00								
	1/22/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding argument on motion to compel production of documents.	\$780	0.7	\$546.00								
	1/22/2020 Cocchia, Robert A.	Analyze Sunrise's 1/22/20 document production.	\$780	1.3	\$1,014.00								
	1/22/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding compensation structure for Sales Directors and commissions from move-in payments.	\$780	0.2	\$156.00								
	1/22/2020 Cocchia, Robert A.	Supervise filing under seal of supplemental brief per Court's order.	\$780	0.2	\$156.00								
	1/22/2020 Healey, Christopher J.	Prepare correspondence to Attorney Thamer regarding status.	\$870	0.1	\$87.00								
	1/22/2020 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding deposition review.	\$870	0.1	\$87.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>		
	1/22/2020 Healey, Christopher J.	Review Attorney Cocchia's argument outline regarding discovery dispute.	\$870	0.7	\$609.00										
	1/22/2020 Healey, Christopher J.	Prepare for meeting regarding discovery argument and prepare outline regarding same.	\$870	2	\$1,740.00										
	1/22/2020 Healey, Christopher J.	Meet with Attorney Cocchia regarding discovery hearing.	\$870	1.3	\$1,131.00	0.6	522.00								
	1/22/2020 Healey, Christopher J.	Review Sunrise document production.	\$870	0.5	\$435.00										
	1/22/2020 Healey, Christopher J.	Review background regarding Healthpeak production.	\$870	0.1	\$87.00										
	1/22/2020 Healey, Christopher J.	Prepare correspondence regarding Move-In Fee commissions.	\$870	0.2	\$174.00										
	1/22/2020 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location.	\$195	0.5	\$97.50										
	1/22/2020 Myrick, Tracy R.	Prepare and gather hard copies of select defendant documents for hearing and provide to caseteam.	\$195	0.5	\$97.50										
	1/22/2020 Myrick, Tracy R.	Create and update deposition log for caseteam.	\$195	0.3	\$58.50										
	1/23/2020 Cocchia, Robert A.	Prepare for hearing on motion to compel production of documents.	\$780	3.5	\$2,730.00										
	1/23/2020 Cocchia, Robert A.	Participate in hearing on motion to compel production of documents.	\$780	1.5	\$1,170.00										
	1/23/2020 Cocchia, Robert A.	Travel to and from discovery hearing	\$780	2	\$1,560.00									2	1560
	1/23/2020 Cocchia, Robert A.	Telephone conference with Attorney Healey regarding results of hearing.	\$780	0.4	\$312.00			0.4	312.00						
	1/23/2020 Healey, Christopher J.	Review tentative discovery ruling.	\$870	0.2	\$174.00										
	1/23/2020 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding hearing.	\$870	0.4	\$348.00										
	1/23/2020 Healey, Christopher J.	Correspondence with Attorney Warren regarding discovery follow-up.	\$870	0.2	\$174.00										
	1/23/2020 Healey, Christopher J.	Review file regarding to-do issues.	\$870	0.2	\$174.00										
	1/23/2020 Healey, Christopher J.	Analysis regarding Sunrise staffing tool	\$870	1.4	\$1,218.00										
	1/23/2020 Healey, Christopher J.	Correspondence with Attorney Cocchia re same	\$870	0.2	\$174.00										
	1/23/2020 Healey, Christopher J.	Further analysis regarding staffing tool.	\$870	0.8	\$696.00										
	1/24/2020 Cocchia, Robert A.	Draft comprehensive summary of motion to compel hearing and circulate same to team.	\$780	0.7	\$546.00										
	1/24/2020 Cocchia, Robert A.	Review minute order from court regarding motion to compel production of documents.	\$780	0.1	\$78.00										
	1/24/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding status of discovery issues.	\$780	0.4	\$312.00										
	1/24/2020 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel regarding further meet and confer on motion to compel.	\$780	0.2	\$156.00										
	1/24/2020 Cocchia, Robert A.	Analyze documents regarding staffing data produced by Sunrise in preparation for meet and confer on same.	\$780	0.8	\$624.00										
	1/24/2020 Healey, Christopher J.	Review hearing report.	\$870	0.2	\$174.00										
	1/24/2020 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding discovery ruling.	\$870	0.3	\$261.00										
	1/24/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery hearing.	\$870	0.2	\$174.00										
	1/24/2020 Healey, Christopher J.	Review correspondence regarding meet and confer.	\$870	0.1	\$87.00										
	1/24/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding meet and confer and followup conference.	\$870	0.3	\$261.00										
	1/24/2020 Myrick, Tracy R.	Download deposition transcript/exhibits of A. Apolinario and provide link to caseteam.	\$195	0.4	\$78.00										

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/24/2020 Myrick, Tracy R.	Upload J. Villanueva deposition video, transcript and exhibits to shared drive and provide caseteam with link to location.	\$195	0.5		\$97.50								
	1/24/2020 Myrick, Tracy R.	Create Casenotebook database and import J. Villanueva transcript, exhibits and video.	\$195	0.9		\$175.50								
	1/25/2020 Cocchia, Robert A.	Prepare for meet and confer conference call with opposing counsel regarding sampling methodology.	\$780	1		\$780.00								
	1/26/2020 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel regarding discovery meet and confer.	\$780	0.1		\$78.00								
	1/26/2020 Cocchia, Robert A.	Review Sunrise production regarding data produced on hours worked in preparation for meet and confer conference.	\$780	0.8		\$624.00								
	1/27/2020 Cocchia, Robert A.	Prepare for and conduct meet and confer conference with opposing counsel regarding staffing data and sampling protocol and additional protective order restrictions and draft summary of conference for co-counsel.	\$780	2.1		\$1,638.00								
	1/27/2020 Cocchia, Robert A.	Review and exchange e-mails regarding deposition scheduling and pending discovery issues.	\$780	0.3		\$234.00								
	1/27/2020 Healey, Christopher J.	Correspondence regarding Plaintiff's depositions.	\$870	0.1		\$87.00								
	1/27/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00								
	1/27/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery meet and confer.	\$870	0.2		\$174.00								
	1/27/2020 Myrick, Tracy R.	Load A. Apolinario deposition transcript and exhibits into casenotebook database.	\$195	0.5		\$97.50								
	1/28/2020 Cocchia, Robert A.	Meet and confer telephone conference with opposing counsel regarding plaintiffs' motion to compel production of documents and proposed sampling of communities.	\$780	0.5		\$390.00								
	1/28/2020 Cocchia, Robert A.	Draft joint statement regarding meet and confer efforts as directed by the Court on 1/23/20.	\$780	0.3		\$234.00								
	1/28/2020 Cocchia, Robert A.	Review and exchange e-mails with co-counsel regarding further discovery issues to be raised with opposing counsel and the Court.	\$780	0.7		\$546.00								
	1/28/2020 Cocchia, Robert A.	Research protective order issues in context of additional demands made by Sunrise regarding same.	\$780	1.8		\$1,404.00								
	1/28/2020 Healey, Christopher J.	Correspondence regarding Rule 30(b)(6) deposition.	\$870	0.1		\$87.00								
	1/28/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding meet and confer.	\$870	0.3		\$261.00								
	1/28/2020 Healey, Christopher J.	Outline agreement regarding same.	\$870	0.1		\$87.00								
	1/28/2020 Healey, Christopher J.	Prepare correspondence to Attorney Gorman regarding Rule 30(b)(6) deposition.	\$870	0.1		\$87.00								
	1/28/2020 Myrick, Tracy R.	Upload Plaintiff Ganz production to shared drive and provide caseteam with link to location.	\$195	0.4		\$78.00								
	1/29/2020 Cocchia, Robert A.	Draft summary of meet and confer efforts with Sunrise on 1/27 and 1/28 regarding sampling and trade secret issues.	\$780	0.6		\$468.00								
	1/29/2020 Cocchia, Robert A.	Draft meet and confer correspondence to Sunrise regarding staffing data.	\$780	0.6		\$468.00								
	1/29/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding strategy on further discovery issues.	\$780	0.5		\$390.00								
	1/29/2020 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel regarding modifications to protective order and research regarding support for same.	\$780	1.3		\$1,014.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	1/29/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding discovery arguments.	\$870	0.1									
	1/29/2020 Healey, Christopher J.	Review Attorney Cocchia correspondence regarding meet and confer.	\$870	0.1									
	1/29/2020 Healey, Christopher J.	Office conferences with Attorney Cocchia regarding discovery argument.	\$870	0.5									
	1/29/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding ESI issue and motion regarding same.	\$870	0.3									
	1/29/2020 Healey, Christopher J.	Prepare correspondence regarding ESI motion.	\$870	0.3									
	1/29/2020 Healey, Christopher J.	Telephone conference with Attorney Yarnell regarding class member calls.	\$870	0.1									
	1/30/2020 Cocchia, Robert A.	Meet and confer e-mails and telephone conference with opposing counsel regarding restrictions on use of time task studies, production of staffing data and joint statement to court regarding same.	\$780	2									
	1/30/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding strategy regarding discovery positions.	\$780	0.6									
	1/30/2020 Cocchia, Robert A.	Analysis of monthly data produced by Sunrise for exempt personnel.	\$780	1.4									
	1/30/2020 Cocchia, Robert A.	Finalize joint statement regarding discovery meet and confer and file same with the Court.	\$780	1									
	1/30/2020 Cocchia, Robert A.	Review and exchange e-mails with co-counsel regarding additional restrictions on task time data proposed by Sunrise.	\$780	0.2									
	1/30/2020 Cocchia, Robert A.	Pull meet and confer correspondence for Attorney Healey.	\$780	0.2									
	1/30/2020 Healey, Christopher J.	Review Defendants' proposals regarding time studies and Kronos data production.	\$870	0.3									
	1/30/2020 Healey, Christopher J.	Correspondence with Attorney Cocchia regarding same.	\$870	0.3									
	1/30/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding same.	\$870	0.2									
	1/30/2020 Healey, Christopher J.	Telephone conferences with Attorney Marks regarding Sunrise's Kronos production and protective order issues.	\$870	0.4									
	1/30/2020 Healey, Christopher J.	Office conferences with Attorney Cocchia regarding same and Defendants' proposals.	\$870	0.6									
	1/30/2020 Healey, Christopher J.	Review Sunrise spreadsheet regarding actual/target staffing data.	\$870	0.5									
	1/30/2020 Healey, Christopher J.	Review draft motion to compel regarding email.	\$870	0.5									
	1/30/2020 Healey, Christopher J.	Review prior document requests.	\$870	0.5									
	1/30/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding updated discovery.	\$870	0.3									
	1/30/2020 Healey, Christopher J.	Outline meet and confer letter.	\$870	0.4									
	1/30/2020 Myrick, Tracy R.	Download multiple defendant production and provide caseteam with link to location.	\$195	1									
	1/31/2020 Cocchia, Robert A.	Review and exchange multiple e-mails with co-counsel regarding discovery issues and production of task time studies.	\$780	0.9									
	1/31/2020 Cocchia, Robert A.	Review final order on motion to compel production of documents issued by the Court.	\$780	0.4									
	1/31/2020 Cocchia, Robert A.	Review and revise draft request for production of documents, set four.	\$780	0.8									
	1/31/2020 Cocchia, Robert A.	Draft correspondence to opposing counsel regarding agreement on sampling methodology.	\$780	0.6									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/31/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding strategy on further discovery motions.	\$780	0.4		\$312.00								
	1/31/2020 Cocchia, Robert A.	Review Sunrise's most recent production of documents.	\$780	1		\$780.00								
	1/31/2020 Healey, Christopher J.	Correspondence regarding Rule 30(b)(6) deposition and meet and confer.	\$870	0.3		\$261.00								
	1/31/2020 Healey, Christopher J.	Review and revise Request for Production of Documents, Set Four.	\$870	2.4		\$2,088.00								
	1/31/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery issues.	\$870	0.2		\$174.00								
	1/31/2020 Healey, Christopher J.	Review Gibson letter regarding class member contact.	\$870	0.2		\$174.00								
	1/31/2020 Healey, Christopher J.	Correspondence with Attorney Needham's office regarding same.	\$870	0.1		\$87.00								
	1/31/2020 Healey, Christopher J.	Review court order regarding discovery issues.	\$870	0.3		\$261.00								
	1/31/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding same.	\$870	0.2		\$174.00								
	1/31/2020 Healey, Christopher J.	Revise email confirming deal regarding sample production.	\$870	0.8		\$696.00								
	1/31/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding same.	\$870	0.2		\$174.00								
	1/31/2020 Healey, Christopher J.	Correspondence regarding sample discovery agreement	\$870	0.1		\$87.00								
	1/31/2020 Healey, Christopher J.	Correspondence regarding expert invoice issues.	\$870	0.2		\$174.00								
	2/1/2020 Healey, Christopher J.	Outline meet and confer letter regarding ESI.	\$870	0.2		\$174.00								
	2/1/2020 Healey, Christopher J.	Correspondence with Attorney Stebner regarding media interview.	\$870	0.1		\$87.00								
	2/2/2020 Healey, Christopher J.	Draft meet and confer letter regarding ESI and related issues.	\$870	3		\$2,610.00								
	2/3/2020 Cocchia, Robert A.	Review and exchange e-mails with co-counsel regarding ESI storage protocols for expert witnesses.	\$780	0.2		\$156.00								
	2/3/2020 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel regarding modifications to protective order for task time study and conference with the Court.	\$780	0.5		\$390.00								
	2/3/2020 Cocchia, Robert A.	Review deposition transcripts for Sunrise Executive Directors regarding task time study documents to be identified for production.	\$780	1.1		\$858.00								
	2/3/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding new motion to compel.	\$780	0.2		\$156.00								
	2/3/2020 Healey, Christopher J.	Prepare correspondence to team regarding REITs.	\$870	0.5		\$435.00								
	2/3/2020 Healey, Christopher J.	Revise meet and confer letter.	\$870	0.3		\$261.00								
	2/3/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding same.	\$870	0.1		\$87.00								
	2/3/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$870	0.1		\$87.00								
	2/3/2020 Healey, Christopher J.	Review Gibson letter regarding Sunrise production.	\$870	0.1		\$87.00								
	2/3/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding deposition preparation.	\$870	0.1		\$87.00								
	2/3/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding expert reimbursement and prepare correspondence to team regarding same.	\$870	0.1		\$87.00								
	2/3/2020 Healey, Christopher J.	Review and exchange multiple e-mails with opposing counsel regarding production of documents and conference with the Court												
	2/4/2020 Cocchia, Robert A.	and analyze 1/31/20 Order regarding census data.	\$780	0.9		\$702.00								
	2/4/2020 Cocchia, Robert A.	E-mail Court regarding telephonic conference with Judge Early.	\$780	0.1		\$78.00								
	2/4/2020 Cocchia, Robert A.	Draft meet and confer correspondence to opposing counsel regarding ESI and responses to requests for production of documents.	\$780	2.3		\$1,794.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	2/4/2020 Cocchia, Robert A.	Review and exchange e-mails with team regarding discovery and fact witness discovery.	\$780	0.6		\$468.00								
	2/4/2020 Cocchia, Robert A.	Review and exchange e-mails regarding sample communities for discovery.	\$780	0.3		\$234.00								
	2/4/2020 Healey, Christopher J.	Correspondence with Attorney Warren regarding Rob Loehman's interview.	\$870	0.1		\$87.00								
	2/4/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding press interview.	\$870	0.2		\$174.00								
	2/4/2020 Healey, Christopher J.	Review correspondence regarding discovery hearing.	\$870	0.1		\$87.00								
	2/4/2020 Healey, Christopher J.	Review Gibson email regarding facility data.	\$870	0.1		\$87.00								
	2/4/2020 Healey, Christopher J.	Prepare correspondence to team regarding same and selection of sample facilities.	\$870	0.1		\$87.00								
	2/4/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1		\$87.00								
	2/4/2020 Healey, Christopher J.	Correspondence regarding draft meet and confer letter.	\$870	0.1		\$87.00								
	2/4/2020 Healey, Christopher J.	Correspondence regarding sample facilities and background regarding Sunrise facilities.	\$870	0.3		\$261.00								
	2/5/2020 Cocchia, Robert A.	Research regarding 30(b)(6) protective orders and motions to compel under the federal and local rules.	\$780	1.5		\$1,170.00								
	2/5/2020 Cocchia, Robert A.	Prepare for and participate in telephonic meet and confer with opposing counsel regarding 30(b)(6) notice.	\$780	1		\$780.00								
	2/5/2020 Cocchia, Robert A.	Draft correspondence to opposing counsel regarding deposition dates for 30(b)(6) notice.	\$780	0.3		\$234.00								
	2/5/2020 Cocchia, Robert A.	Conference with Attorney Healey and Attorney Ross regarding research related to class certification.	\$780	0.3		\$234.00	0.3	234						
	2/5/2020 Cocchia, Robert A.	Review and exchange e-mails regarding additional discovery requests and meet and confer with opposing counsel.	\$780	0.5		\$390.00								
	2/5/2020 Cocchia, Robert A.	Draft meet and confer correspondence to opposing counsel regarding ESI and production of documents.	\$780	1.5		\$1,170.00								
	2/5/2020 Healey, Christopher J.	Prepare for meet and confer call regarding Rule 30(b)(6) deposition.	\$870	0.3		\$261.00								
	2/5/2020 Healey, Christopher J.	Meet and confer call with Gibson firm regarding Rule 30(b)(6) deposition.	\$870	1		\$870.00								
	2/5/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding meet and confer preparation.	\$870	0.2		\$174.00								
	2/5/2020 Healey, Christopher J.	Office conference with Attorney Ross and Cocchia regarding research to support class motion.	\$870	0.3		\$261.00								
	2/5/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.2		\$174.00								
	2/5/2020 Healey, Christopher J.	Review expert engagement proposal.	\$870	0.1		\$87.00								
	2/5/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding case status and staffing analysis.	\$870	0.1		\$87.00								
	2/5/2020 Healey, Christopher J.	Follow-up correspondence with Attorney Cocchia regarding meet and confer.	\$870	0.1		\$87.00								
	2/5/2020 Healey, Christopher J.	Prepare correspondence to Attorney Thamer regarding deposition support.	\$870	0.1		\$87.00								
	2/5/2020 Healey, Christopher J.	Revise meet and confer letter.	\$870	0.2		\$174.00								
	2/5/2020 Healey, Christopher J.	Conference with Attorney Cocchia regarding same.	\$870	0.1		\$87.00								
	2/5/2020 Healey, Christopher J.	Email to Gibson firm regarding discovery issues (Case Labor Management and Daily Labor Management Data).	\$870	0.8		\$696.00								
	2/5/2020 Healey, Christopher J.	Review and revise discovery correspondence.	\$870	0.2		\$174.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	2/5/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding costs and telephone conference regarding same and case status.	\$870	0.1		\$87.00									
	2/5/2020 Valero, Carmen A.	Research and compile all internet reviews on 5 CA Sunrise facilities, for C. Healey.	\$360	1		\$360.00									
	2/5/2020 Ross, Rachel L.	Strategy discussion with B. Cocchia and C. Healey in preparation for class certification motion to provide an overview of case and assignment to analyze Judge Staton's class certification decisions	\$405	0.3		\$121.50	0.3	121.5							
	2/6/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding sample set of communities for production of staffing information.	\$780	0.3		\$234.00									
	2/6/2020 Cocchia, Robert A.	Analysis of research into potential sample communities for production of staffing information.	\$780	0.8		\$624.00									
	2/6/2020 Cocchia, Robert A.	Draft e-mail to opposing counsel regarding sample selection of communities.	\$780	0.2		\$156.00									
	2/6/2020 Cocchia, Robert A.	Research regarding disclosure obligations under FRCP and district court opinions regarding same.	\$780	2.5		\$1,950.00	1	780.00							
	2/6/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding research into impact of undisclosed commissions.	\$780	0.2		\$156.00									
	2/6/2020 Cocchia, Robert A.	Research regarding impact of arbitration agreement on pre-agreement conduct.	\$780	1.7		\$1,326.00									
	2/6/2020 Healey, Christopher J.	Review correspondence regarding named plaintiff depositions.	\$870	0.1		\$87.00									
	2/6/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1		\$261.00									
	2/6/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding arbitration issues, discovery and sample facilities.	\$870	0.3		\$174.00									
	2/6/2020 Healey, Christopher J.	Research and correspondence regarding reliance issues and Volkswagen decision.	\$870	0.2		\$174.00									
	2/6/2020 Healey, Christopher J.	Analysis regarding PO designation issues and correspondence to Attorney Gorman regarding same.	\$870	0.2		\$174.00									
	2/6/2020 Healey, Christopher J.	Telephone conference with Attorney Yarnell regarding sample facilities.	\$870	0.2		\$174.00									
	2/6/2020 Healey, Christopher J.	Office conference regarding same.	\$870	0.1		\$87.00									
	2/6/2020 Ross, Rachel L.	Analyze Judge Early's Order re Plaintiffs' Motion to Compel Further Responses to Request for Production of Documents	\$405	0.3		\$121.50	0.3	121.5							
	2/6/2020 Ross, Rachel L.	Analyze motion for class certification draft	\$405	0.5		\$202.50	0.5	202.5							
	2/7/2020 Cocchia, Robert A.	Review and exchange e-mails regarding client's deposition.	\$780	0.2		\$156.00									
	2/7/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding discovery motions and additional written discovery requests.	\$780	0.3		\$234.00									
	2/7/2020 Cocchia, Robert A.	Research regarding 30(b)(6) depositions and objections to same.	\$780	1.4		\$1,092.00									
	2/7/2020 Cocchia, Robert A.	Analyze prior written discovery and responses to same and obligations for supplemental disclosure.	\$780	1.1		\$858.00									
	2/7/2020 Cocchia, Robert A.	Brief research regarding Rule 26 disclosure obligations and analysis of Sunrise's disclosures.	\$780	1.5		\$1,170.00									
	2/7/2020 Healey, Christopher J.	Correspondence regarding Ganz deposition.	\$870	0.3		\$261.00									
	2/7/2020 Healey, Christopher J.	Follow-up correspondence regarding adequate rep issues.	\$870	0.2		\$174.00									
	2/7/2020 Healey, Christopher J.	Prepare correspondence to Attorney Warren regarding Fearn's deposition preparation.	\$870	0.3		\$261.00									
	2/7/2020 Healey, Christopher J.	Correspondence regarding class member contacts.	\$870	0.2		\$174.00									
	2/7/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding Ganz deposition testimony.	\$870	0.2		\$174.00									
	2/7/2020 Healey, Christopher J.	Analysis regarding Ganz deposition correction issues.	\$870	1.5		\$1,305.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>	<u>Fees</u>	<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	2/7/2020 Healey, Christopher J.	Correspondence with team regarding same.	\$870	1	\$870.00								
	2/7/2020 Healey, Christopher J.	Correspondence regarding class member call.	\$870	0.2	\$174.00								
	2/7/2020 Healey, Christopher J.	Telephone conference with Attorney Warren regarding scheduling and deposition issues.	\$870	0.2	\$174.00								
	2/7/2020 Ross, Rachel L.	Analyze Judge Staton's previous orders re class certification	\$405	0.4	\$162.00	0.4		162					
	2/9/2020 Healey, Christopher J.	Outline argument/inserts to class certification brief.	\$870	3.5	\$3,045.00								
	2/9/2020 Healey, Christopher J.	Outline key facts to support class motion.	\$870	1.6	\$1,392.00								
	2/10/2020 Healey, Christopher J.	Outline key facts regarding class certification motion.	\$870	0.3	\$261.00								
	2/10/2020 Healey, Christopher J.	Review Villanueva deposition transcript confidential designations.	\$870	0.1	\$87.00								
	2/10/2020 Healey, Christopher J.	Draft outline to class certification motion.	\$870	2.3	\$2,001.00								
	2/10/2020 Ross, Rachel L.	Analyze Judge Staton's orders deciding class certification	\$405	2.3	\$931.50	2.3		931.5					
	2/11/2020 Healey, Christopher J.	Review Attorney Gorman's email regarding Rule 30(b)(6) deposition.	\$870	0.1	\$87.00								
	2/11/2020 Healey, Christopher J.	Response regarding same.	\$870	0.1	\$87.00								
	2/11/2020 Healey, Christopher J.	Draft class certification motion.	\$870	3.6	\$3,132.00								
	2/11/2020 Myrick, Tracy R.	Upload J. Villanueva Confidential Designations and Errata Sheet for 1/7/20 deposition and provide caseteam with link to location.	\$195	0.1	\$19.50								
	2/11/2020 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location.	\$195	0.5	\$97.50								
	2/11/2020 Ross, Rachel L.	Analyze Judge Staton's Orders re class certification to assist in drafting motion for class certification	\$405	2.4	\$972.00	2.4		972					
	2/12/2020 Cocchia, Robert A.	Draft summary of meet and confer regarding Sunrise's calculation of standard hours.	\$780	0.6	\$468.00								
	2/12/2020 Cocchia, Robert A.	Revise draft declaration regarding history of discovery meet and confer with opposing counsel.	\$780	0.9	\$702.00								
	2/12/2020 Cocchia, Robert A.	Review communications with opposing counsel regarding production of residency agreements and completion of production.	\$780	1.1	\$858.00								
	2/12/2020 Healey, Christopher J.	Review document production.	\$870	0.1	\$87.00								
	2/12/2020 Healey, Christopher J.	Prepare "to do" issues.	\$870	0.1	\$87.00								
	2/12/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1	\$87.00								
	2/12/2020 Healey, Christopher J.	Prepare correspondence regarding potential defense experts.	\$870	0.1	\$87.00								
	2/12/2020 Healey, Christopher J.	Outline motion for class certification.	\$870	0.7	\$609.00								
	2/12/2020 Healey, Christopher J.	Review cases regarding "lack of policy".	\$870	0.5	\$435.00								
	2/13/2020 Healey, Christopher J.	Prepare correspondence to file regarding class certification arguments.	\$870	0.2	\$174.00								
	2/13/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery status.	\$870	0.1	\$87.00								
	2/13/2020 Healey, Christopher J.	Prepare correspondence to Gibson firm regarding 30(b)(6) deposition notice and open discovery issues.	\$870	0.2	\$174.00								
	2/13/2020 Healey, Christopher J.	Review Sunrise documents.	\$870	2	\$1,740.00								
	2/14/2020 Cocchia, Robert A.	Analysis of task time spreadsheets produced by Sunrise and conference with Attorney Healey regarding same.	\$780	1.4	\$1,092.00								
	2/14/2020 Cocchia, Robert A.	Review and exchange e-mails with opposing counsel regarding document production.	\$780	0.3	\$234.00								
	2/14/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding 30(b)(6) deposition issues.	\$780	0.3	\$234.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	2/14/2020 Cocchia, Robert A.	Review e-mail from opposing counsel regarding Defendant's request for documents.	\$780	0.2									
	2/14/2020 Cocchia, Robert A.	Analyze written discovery propounded on plaintiffs.	\$780	0.3	\$234.00								
	2/14/2020 Cocchia, Robert A.	Brief legal research regarding early expert discovery.	\$780	0.8	\$624.00								
	2/14/2020 Healey, Christopher J.	Review Residency Agreement.	\$870	1	\$870.00								
	2/14/2020 Healey, Christopher J.	Prepare to-do list.	\$870	0.2	\$174.00								
	2/14/2020 Healey, Christopher J.	Outline arguments for motion.	\$870	0.5	\$435.00								
	2/14/2020 Healey, Christopher J.	Review Attorney Gorman email regarding 30(b)(6) deposition.	\$870	0.1	\$87.00								
	2/14/2020 Healey, Christopher J.	Confer with Attorney Cocchia regarding deposition and other discovery issues.	\$870	0.2	\$174.00								
	2/14/2020 Healey, Christopher J.	Review Attorney Gorman email regarding plaintiff Ganz testimony.	\$870	0.2	\$174.00								
	2/14/2020 Healey, Christopher J.	Correspondence with co-counsel regarding same.	\$870	0.2	\$174.00								
	2/14/2020 Healey, Christopher J.	Review New York article regarding lawsuit.	\$870	0.1	\$87.00								
	2/14/2020 Healey, Christopher J.	Correspondence with Attorney Gorman regarding E-service for discovery.	\$870	0.2	\$174.00								
	2/14/2020 Healey, Christopher J.	Office conference regarding Sunrise production.	\$870	0.3	\$261.00								
	2/14/2020 Healey, Christopher J.	Review correspondence regarding discovery issues.	\$870	0.7	\$609.00								
	2/14/2020 Myrick, Tracy R.	Export E-Bulletin files from Relativity database and provide to caseteam.	\$195	0.5	\$97.50								
	2/14/2020 Myrick, Tracy R.	Prepare manifest of defendant data on encrypted drive and provide to caseteam.	\$195	0.2	\$39.00								
	2/14/2020 Myrick, Tracy R.	Upload same data to shared drive and provide caseteam with link to location.	\$195	0.4	\$78.00								
	2/14/2020 Myrick, Tracy R.	Transfer defendant confidential production to Co-Counsel via Accellion secured file transfer per C. Healey and provide password in separate transmission.	\$195	0.5	\$97.50								
	2/15/2020 Healey, Christopher J.	Review task time documentation.	\$870	0.2	\$174.00								
	2/15/2020 Healey, Christopher J.	Outline class certification arguments.	\$870	0.5	\$435.00								
	2/16/2020 Healey, Christopher J.	Draft class certification brief.	\$870	2.2	\$1,914.00								
	2/16/2020 Healey, Christopher J.	Further outline and drafting of class certification brief.	\$870	2.6	\$2,262.00								
	2/17/2020 Cocchia, Robert A.	Review Villanueva's testimony regarding Sunrise Strong presentation with respect to Court's order on discovery.	\$780	0.7	\$546.00								
	2/17/2020 Healey, Christopher J.	Draft class certification brief.	\$870	4.2	\$3,654.00								
	2/17/2020 Healey, Christopher J.	Review Attorney Thamer correspondence regarding Villanueva transcript.	\$870	0.1	\$87.00								
	2/17/2020 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding deposition summary and key points.	\$870	0.2	\$174.00								
	2/18/2020 Cocchia, Robert A.	Draft additions to discovery declaration regarding meet and confer efforts with opposing counsel.	\$780	0.4	\$312.00								
	2/18/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding additional motion(s) to compel related to Sunrise's deficient discovery responses.	\$780	0.3	\$234.00								
	2/18/2020 Cocchia, Robert A.	prepare for meet and confer with opposing counsel on 30(b)(6) deposition notice and continued issues with document production.	\$780	1.1	\$858.00								
	2/18/2020 Cocchia, Robert A.	Review Sunrise's most recent document productions.	\$780	1.5	\$1,170.00								
	2/18/2020 Cocchia, Robert A.	Search production for document associated with e-bulletin produced by Sunrise.	\$780	0.8	\$624.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	2/18/2020 Cocchia, Robert A.	Review and exchange e-mails with Mr. Ahmadian regarding assistance with ESI issues.	\$780	0.2		\$156.00									
	2/18/2020 Healey, Christopher J.	Office conference with Tracy Myrick regarding Dentons' Direct.	\$870	0.1		\$87.00									
	2/18/2020 Healey, Christopher J.	Review correspondence regarding same.	\$870	0.1		\$87.00									
	2/18/2020 Healey, Christopher J.	Revise draft class certification brief and prepare correspondence to Attorney Stebner regarding injunctive relief issue.	\$870	0.2		\$174.00									
	2/18/2020 Healey, Christopher J.	Outline response to Sunrise objection regarding Care Labor management tool.	\$870	0.4		\$348.00									
	2/18/2020 Healey, Christopher J.	Office conference regarding meet and confer issues.	\$870	0.2		\$174.00									
	2/18/2020 Healey, Christopher J.	Prepare correspondence regarding assistance on E-discovery issues.	\$870	0.1		\$87.00									
	2/18/2020 Healey, Christopher J.	Review deposition preparation outline and correspondence regarding same.	\$870	0.2		\$174.00									
	2/18/2020 Myrick, Tracy R.	Download defendant production and provide link to caseteam.	\$195	0.5		\$97.50									
	2/18/2020 Myrick, Tracy R.	Update production log regarding same.	\$195												
	2/18/2020 Myrick, Tracy R.	Upload A. Apolinario errata sheet to shared drive and provide caseteam with link to location.	\$195	0.1		\$19.50									
	2/18/2020 Myrick, Tracy R.	Update deposition log regarding same.	\$195	0.1		\$19.50									
	2/18/2020 Ross, Rachel L.	Analyze and review Judge Staton's orders on class certification in preparation for drafting class certification motion.	\$405	5.3		\$2,146.50		5.3	2146.5						
	2/18/2020 Ross, Rachel L.	Draft Memo re summary of Judge Staton's orders re class certification.	\$405	1		\$405.00		1	405						
	2/19/2020 Cocchia, Robert A.	Prepare for and participate in meet and confer conference with opposing counsel regarding 30(b)(6) deposition notice and outstanding document production issues.	\$780	1.6		\$1,248.00									
	2/19/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding class certification motion and strategy for further discovery to support same.	\$780	0.5		\$390.00									
	2/19/2020 Cocchia, Robert A.	Research regarding objections and motion for protective order for 30(b)(6) witness in 9th Circuit and Central District.	\$780	3.2		\$2,496.00		1	780.00						
	2/19/2020 Cocchia, Robert A.	Draft e-mail to opposing counsel regarding Care Labor Management Tool and related staffing documents.	\$780	0.5		\$390.00									
	2/19/2020 Cocchia, Robert A.	Conference with Mr. Ahmadian regarding ESI issues in preparation for meet and confer call with opposing counsel.	\$780	0.1		\$78.00									
	2/19/2020 Healey, Christopher J.	Correspondence regarding class certification inquiries.	\$870	0.2		\$174.00									
	2/19/2020 Healey, Christopher J.	Review file regarding Gibson discovery requests regarding Plaintiff Ganz.	\$870	0.2		\$174.00									
	2/19/2020 Healey, Christopher J.	Prepare for meet and confer call regarding Rule 30(b)(6) deposition.	\$870	2.7		\$2,349.00									
	2/19/2020 Healey, Christopher J.	Draft class certification brief.	\$870	0.2		\$174.00									
	2/19/2020 Healey, Christopher J.	Outline call with Attorney Marks regarding staffing analysis.	\$870	0.6		\$522.00									
	2/19/2020 Healey, Christopher J.	Outline call with Patrick Kennedy regarding damage analysis.	\$870	0.8		\$696.00									
	2/19/2020 Healey, Christopher J.	Meet and confer with Gibson regarding Rule 30(b)(6) deposition and related discovery issues.	\$870	0.4		\$348.00									
	2/19/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery issues.	\$870	0.3		\$261.00									
	2/19/2020 Healey, Christopher J.	Draft email to Attorney Marks regarding staffing analysis and related expert issues.	\$870	0.3		\$261.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	2/19/2020 Healey, Christopher J.	Prepare correspondence to defense counsel regarding meet and confer.	\$870	0.3		\$261.00									
	2/19/2020 Myrick, Tracy R.	Download A. Apolinario deposition video and import into casenotebook.	\$195	0.5		\$97.50									
	2/19/2020 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location.	\$195	0.3		\$58.50									
	2/19/2020 Ross, Rachel L.	Finish review of Judge Staton's orders re class certification and summarize analysis and findings in memo for C. Healey and B. Cocchia	\$405	3.6		\$1,458.00	3.6	1458							
	2/20/2020 Cocchia, Robert A.	Revise draft motion for class certification.	\$780	3.6		\$2,808.00									
	2/20/2020 Cocchia, Robert A.	Review correspondence from opposing counsel regarding press.	\$780	0.2		\$156.00									
	2/20/2020 Cocchia, Robert A.	Review correspondence from opposing counsel regarding 30(b)(6) issues and status of parties' meet and confer.	\$780	0.2		\$156.00									
	2/20/2020 Cocchia, Robert A.	Update discovery declaration regarding meet and confer with opposing counsel.	\$780	0.6		\$468.00									
	2/20/2020 Healey, Christopher J.	Outline discovery to-do plan.	\$870	0.3		\$261.00									
	2/20/2020 Healey, Christopher J.	Review caselaw regarding Rule 30(b)(6) deposition notice.	\$870	0.3		\$261.00									
	2/20/2020 Healey, Christopher J.	Research regarding class certification filing requirement.	\$870	0.1		\$87.00									
	2/20/2020 Healey, Christopher J.	Correspondence regarding case status.	\$870	0.1		\$87.00									
	2/20/2020 Healey, Christopher J.	Prepare correspondence regarding class certification filing and compliance with LR 7-3.	\$870	0.2		\$174.00									
	2/20/2020 Healey, Christopher J.	Review Gibson email regarding Ganz documents and deposition issues.	\$870	0.1		\$87.00									
	2/20/2020 Healey, Christopher J.	Review Maryott letter regarding NY Times article.	\$870	0.1		\$87.00									
	2/20/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding draft brief.	\$870	0.2		\$174.00									
	2/20/2020 Healey, Christopher J.	Review Attorney Cocchia's revisions to draft brief.	\$870	0.1		\$87.00									
	2/20/2020 Healey, Christopher J.	Review memorandum regarding Judge Staton Class decisions.	\$870	0.5		\$435.00									
	2/20/2020 Healey, Christopher J.	Telephone conference with Patrick Kennedy regarding status and expert preparation.	\$870	0.5		\$435.00									
	2/20/2020 Healey, Christopher J.	Telephone conference with Attorney Warren regarding class certification brief.	\$870	0.3		\$261.00									
	2/20/2020 Healey, Christopher J.	Draft response to Attorney Gorman email.	\$870	0.8		\$696.00									
	2/20/2020 Healey, Christopher J.	Telephone conference with Attorney Arns regarding deposition approach.	\$870	0.2		\$174.00	0.2	174.00							
	2/20/2020 Healey, Christopher J.	Telephone conference with Attorneys Wallace and Umpierre regarding deposition preparation.	\$870	0.5		\$435.00									
	2/20/2020 Healey, Christopher J.	Review Attorney Warren's changes to brief.	\$870	0.1		\$87.00									
	2/20/2020 Healey, Christopher J.	Correspondence regarding Ganz deposition issues.	\$870	0.1		\$87.00									
	2/20/2020 Ross, Rachel L.	Reorganize memo analyzing Judge Staton's cases after data was unsaved.	\$405	2.1		\$850.50	2.1	850.5							
	2/21/2020 Cocchia, Robert A.	Review and exchange e-mails with team regarding discovery status, facility lists and DSS records.	\$780	0.6		\$468.00									
	2/21/2020 Cocchia, Robert A.	Review Judge Staton's prior class certification orders.	\$780	1.5		\$1,170.00									
	2/21/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding 30(b)(6) deposition.	\$780	0.2		\$156.00									
	2/21/2020 Healey, Christopher J.	Prepare to-do list.	\$870	0.1		\$87.00									
	2/21/2020 Healey, Christopher J.	Review and revise proposed response.	\$870	0.5		\$435.00									
	2/21/2020 Healey, Christopher J.	Office conference regarding class brief modifications.	\$870	0.1		\$87.00									
	2/21/2020 Healey, Christopher J.	Review summary of Judge Staton's class decisions.	\$870	0.2		\$174.00									

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	2/21/2020 Healey, Christopher J.	Telephone conference with Attorney Yarnell regarding class certification brief.	\$870	0.3	\$261.00								
	2/21/2020 Healey, Christopher J.	Prepare to-do list regarding discovery/class motion.	\$870	1	\$870.00								
	2/21/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Ganz deposition issues.	\$870	0.5	\$435.00								
	2/21/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding potential analysis.	\$870	0.8	\$696.00								
	2/21/2020 Healey, Christopher J.	Analysis regarding staffing analysis and related issues.	\$870	1.6	\$1,392.00								
	2/22/2020 Healey, Christopher J.	Prepare to-do list.	\$870	0.2	\$174.00								
	2/22/2020 Healey, Christopher J.	Prepare correspondence regarding actual target staffing categories.	\$870	0.3	\$261.00								
	2/22/2020 Healey, Christopher J.	Draft class certification motion.	\$870	2.5	\$2,175.00								
	2/22/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding expert engagement issues.	\$870	0.1	\$87.00								
	2/22/2020 Healey, Christopher J.	Revise expert engagement letter.	\$870	0.5	\$435.00								
	2/22/2020 Myrick, Tracy R.	Run search in relativity regarding Job Description and provide link to caseteam.	\$195	0.3	\$58.50								
	2/23/2020 Healey, Christopher J.	Outline to-do list and discovery issues.	\$870	0.3	\$261.00								
	2/23/2020 Healey, Christopher J.	Outline response to Sunrise discovery.	\$870	0.3	\$261.00								
	2/23/2020 Healey, Christopher J.	Revise class certification brief.	\$870	1.5	\$1,305.00								
	2/23/2020 Healey, Christopher J.	Prepare correspondence to team regarding draft brief.	\$870	0.5	\$435.00								
	2/23/2020 Healey, Christopher J.	Review actual target staffing spreadsheet.	\$870	0.8	\$696.00								
	2/23/2020 Healey, Christopher J.	Analysis regarding same.	\$870	1	\$870.00								
	2/23/2020 Ross, Rachel L.	Read email from C. Healey and co-counsel RE: Sunrise - Class Certification Motion.DOCX	\$405	0.1	\$40.50			0.1	40.5				
	2/24/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding actual/target analysis.	\$870	0.2	\$174.00								
	2/24/2020 Healey, Christopher J.	Telephone conferences regarding data analysis.	\$870	0.5	\$435.00								
	2/24/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding same.	\$870	0.5	\$435.00								
	2/24/2020 Healey, Christopher J.	Review daily/target staffing data.	\$870	1	\$870.00								
	2/24/2020 Healey, Christopher J.	Further telephone conference regarding data analysis.	\$870	0.2	\$174.00								
	2/24/2020 Healey, Christopher J.	Correspondence regarding facility census.	\$870	0.1	\$87.00								
	2/24/2020 Healey, Christopher J.	Correspondence regarding damages expert regarding background documents.	\$870	0.2	\$174.00								
	2/24/2020 Healey, Christopher J.	Correspondence regarding facility list.	\$870	0.1	\$87.00								
	2/24/2020 Healey, Christopher J.	Correspondence with Attorney Yarnell regarding census/bids issue.	\$870	0.2	\$174.00								
	2/24/2020 Myrick, Tracy R.	Transfer Census Data to Co-Counsel via Accellion per C. Healey.	\$195	0.3	\$58.50								
	2/24/2020 Myrick, Tracy R.	Gather and organize case materials to provide to L. Petite per C. Healey.	\$195	0.6	\$117.00								
	2/25/2020 Healey, Christopher J.	Prepare correspondence regarding analysis of target/actual staffing data.	\$870	0.2	\$174.00								
	2/25/2020 Myrick, Tracy R.	Provide case materials via Accellion to L. Petite per C. Healey.	\$195	0.2	\$39.00								
	2/26/2020 Cocchia, Robert A.	Review final amended deposition notice for 30(b)(6) deposition and draft e-mail to opposing counsel regarding same.	\$780	0.5	\$390.00								
	2/26/2020 Cocchia, Robert A.	Continue research regarding scope of 30(b)(6) depositions and motion for protective orders in the Central District regarding same.	\$780	3.6	\$2,808.00								
	2/26/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding discovery issues.	\$870	0.1	\$87.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	2/26/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Ganz deposition corrections.	\$870	0.5									
	2/26/2020 Healey, Christopher J.	Outline potential deposition corrections.	\$870	0.5	\$435.00								
	2/26/2020 Healey, Christopher J.	Revise 30(b)(6) deposition notice.	\$870	0.3	\$261.00								
	2/26/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding same.	\$870	0.2	\$174.00								
	2/26/2020 Healey, Christopher J.	Prepare correspondence to Carmen Valero regarding legal research requests.	\$870	0.2	\$174.00								
	2/27/2020 Cocchia, Robert A.	Telephone conference with opposing counsel regarding Sunrise's ex parte application and review and exchange messages with opposing counsel regarding same.	\$780	0.5	\$390.00								
	2/27/2020 Cocchia, Robert A.	Analyze Sunrise's proposed modifications to protective order and research issues regarding conflicts with Central District rules and ECF procedures.	\$780	0.7	\$546.00								
	2/27/2020 Cocchia, Robert A.	Analyze Sunrise's ex parte application and supporting documents.	\$780	0.4	\$312.00								
	2/27/2020 Cocchia, Robert A.	Draft opposition to Sunrise's ex parte application.	\$780	6.8	\$5,304.00								
	2/27/2020 Cocchia, Robert A.	Analysis of Sunrise's response and written objections to 30(b)(6) deposition notice.	\$780	0.4	\$312.00								
	2/27/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding Sunrise's response to 30(b)(6) notice.	\$780	0.2	\$156.00								
	2/27/2020 Healey, Christopher J.	Office conferences with Attorney Cocchia regarding defendants' ex parte request.	\$870	0.2	\$174.00								
	2/27/2020 Healey, Christopher J.	Review Sunrise's objections to Rule 30(b)(6) depositions.	\$870	0.2	\$174.00								
	2/27/2020 Healey, Christopher J.	Draft proposed response regarding ex parte request.	\$870	0.2	\$174.00								
	2/27/2020 Healey, Christopher J.	Correspondence to team regarding Sunrise ex parte request.	\$870	0.2	\$174.00								
	2/27/2020 Healey, Christopher J.	Prepare correspondence regarding Sunrise objection to Rule 30(b)(6) deposition.	\$870	0.3	\$261.00								
	2/27/2020 Healey, Christopher J.	Outline position regarding deposition letter.	\$870	0.3	\$261.00								
	2/27/2020 Healey, Christopher J.	Revise Attorney Cocchia's response regarding ex parte.	\$870	0.1	\$87.00								
	2/27/2020 Healey, Christopher J.	Prepare correspondence to team regarding to do call on class motion.	\$870	0.1	\$87.00								
	2/27/2020 Healey, Christopher J.	Review correspondence regarding Mission Power.	\$870	0.1	\$87.00								
	2/27/2020 Healey, Christopher J.	Revise letter regarding Ganz corrections.	\$870	0.1	\$87.00								
	2/27/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding discovery status.	\$870	0.2	\$174.00								
	2/27/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Ganz clarification letter.	\$870	0.2	\$174.00								
	2/27/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding opposition to ex parte.	\$870	0.2	\$174.00								
	2/27/2020 Healey, Christopher J.	Correspondence regarding discovery clarification letter.	\$870	0.2	\$174.00								
	2/27/2020 Myrick, Tracy R.	Prepare flashdrive containing deposition transcripts/exhibits/video and send to M. Johnson at Schneider Wallace.	\$195	1	\$195.00								
	2/27/2020 Ross, Rachel L.	Read emails from B. Cocchia and C. Healey re Sunrise - Defendant's notice of Ex Parte	\$405	0.2	\$81.00			0.2	81				
	2/27/2020 Ross, Rachel L.	Analyze New York Times article reporting on Sunrise lawsuit	\$405	0.2	\$81.00			0.2	81.00				
	2/28/2020 Cocchia, Robert A.	Finalize opposition to Sunrise's ex parte application and declaration in support.	\$780	3.1	\$2,418.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	2/28/2020 Cocchia, Robert A.	Review Ramirez decision from 9th Circuit regarding standing for unnamed class members.	\$780	0.7	\$546.00								
	2/28/2020 Cocchia, Robert A.	Review Court's order on Sunrise's ex parte application and conference with Attorney Healey regarding same.	\$780	0.5	\$390.00								
	2/28/2020 Cocchia, Robert A.	Draft e-mail to opposing counsel regarding late document production and related issues	\$780	0.3	\$234.00								
	2/28/2020 Healey, Christopher J.	Revise opposition to discovery ex parte.	\$870	2.5	\$2,175.00								
	2/28/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding further arguments for ex parte opposition.	\$870	0.1	\$87.00								
	2/28/2020 Healey, Christopher J.	Office conference regarding same.	\$870	0.1	\$87.00								
	2/28/2020 Healey, Christopher J.	Review and revise Excel analysis of actual/target staffing.	\$870	1.4	\$1,218.00								
	2/28/2020 Healey, Christopher J.	Prepare correspondence re Excel analysis of actual/target staffing	\$870	0.1	\$87.00								
	2/28/2020 Healey, Christopher J.	Review Ramirez decision and prepare correspondence to team regarding same and office conference regarding follow-up research.	\$870	0.3	\$261.00								
	2/28/2020 Healey, Christopher J.	Telephone conference with Saeid Ahmadian regarding staffing analysis spreadsheet.	\$870	0.2	\$174.00								
	2/28/2020 Healey, Christopher J.	Outline questions regarding Rule 30(b)(6) deposition.	\$870	1	\$870.00								
	2/28/2020 Healey, Christopher J.	Review Magistrate's ruling on ex parte.	\$870	0.2	\$174.00								
	2/28/2020 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding same.	\$870	0.1	\$87.00								
	2/28/2020 Healey, Christopher J.	Prepare correspondence to Kennedy's office regarding budgets.	\$870	0.1	\$87.00								
	2/28/2020 Valero, Carmen A.	Research case law addressing when new information can be added to a reply brief, for C. Healey.	\$360	1	\$360.00								
	2/28/2020 Ross, Rachel L.	Strategy discussion with C. Healey re researching Ninth Circuit case law on risk of harm being actionable	\$405	0.1	\$40.50			0.1	40.5				
	2/28/2020 Ross, Rachel L.	Legal research re Ninth Circuit case law addressing the risk of harm as injury in class action context	\$405	3.2	\$1,296.00			3.2	1296				
	2/29/2020 Healey, Christopher J.	Outline response to Rule 30(b)(6) meet and confer letter.	\$870	0.2	\$174.00								
	2/29/2020 Healey, Christopher J.	Prepare correspondence to Patrick Kenndy regarding defendant's statements.	\$870	0.2	\$174.00								
	2/29/2020 Healey, Christopher J.	Prepare correspondence to team regarding to-do issues and team call.	\$870	0.2	\$174.00								
	3/1/2020 Ahmadian, Saeid R.	Continue to assist attorney Healey with data received from opposing counsel.	\$330	3	\$990.00			3	990				
	3/1/2020 Ahmadian, Saeid R.	Review and analyze Excel file and prepare data summaries.	\$330	3	\$990.00			3	990				
	3/1/2020 Healey, Christopher J.	Draft response to Gibson letter regarding Rule 30(b)(6) deposition.	\$870	4.9	\$4,263.00			2.45	2,131.50				
	3/1/2020 Healey, Christopher J.	Review defendants' discovery requests.	\$870	0.1	\$87.00								
	3/2/2020 Ahmadian, Saeid R.	Assist attorney Healey with data received from opposing counsel.	\$330	3	\$990.00			1.5	495.00				
	3/2/2020 Ahmadian, Saeid R.	Review and analyze Excel file and prepare data summaries.	\$330	8	\$2,640.00			4	1,320.00				
	3/2/2020 Cocchia, Robert A.	Review Sunrise's response to request for production of documents (Set Four).	\$780	0.5	\$390.00								
	3/2/2020 Cocchia, Robert A.	Review draft response to Sunrise's February 27, 2020 correspondence regarding 30(b)(6) deposition.	\$780	0.3	\$234.00								
	3/2/2020 Healey, Christopher J.	Correspondence regarding Stebner response declaration.	\$870	0.4	\$348.00								
	3/2/2020 Healey, Christopher J.	Draft response letter regarding 30(b)(6) deposition notice.	\$870	1.2	\$1,044.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>		
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>
	3/2/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding court order.	\$870	0.2		\$174.00							
	3/2/2020 Healey, Christopher J.	Revise response to Rule 30(b)(6) deposition.	\$870	1		\$870.00							
	3/2/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding response to Maryott letter.	\$870	0.2		\$174.00							
	3/2/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.3		\$261.00							
	3/2/2020 Healey, Christopher J.	Outline to-do issues.	\$870	0.5		\$435.00							
	3/3/2020 Cocchia, Robert A.	Prepare for and participate in team conference call regarding case management and strategy.	\$780	1		\$780.00							
	3/3/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding response to opposing counsel on 30(b)(6) issues.	\$780	0.3		\$234.00							
	3/3/2020 Cocchia, Robert A.	Brief review of production SUN013 and draft e-mail to opposing counsel regarding missing documents.	\$780	0.7		\$546.00							
	3/3/2020 Cocchia, Robert A.	Review and exchange e-mails regarding sample selection to be produced by Sunrise.	\$780	0.3		\$234.00							
	3/3/2020 Healey, Christopher J.	Review and comment regarding staffing spreadsheet analysis.	\$870	0.2		\$174.00							
	3/3/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding same.	\$870	0.4		\$348.00							
	3/3/2020 Healey, Christopher J.	Draft agenda for team call.	\$870	0.3		\$261.00							
	3/3/2020 Healey, Christopher J.	Follow-up correspondence regarding staffing analysis spreadsheet.	\$870	0.2		\$174.00							
	3/3/2020 Healey, Christopher J.	Telephone conference with team regarding to do issues.	\$870	0.5		\$435.00							
	3/3/2020 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding Rule 30(b)(6) deposition response.	\$870	0.2		\$174.00							
	3/3/2020 Healey, Christopher J.	Review Sunrise documents.	\$870	0.3		\$261.00							
	3/3/2020 Healey, Christopher J.	Conference with Tracy Myrick regarding Sunrise documents.	\$870	0.2		\$174.00							
	3/3/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding discovery responses.	\$870	0.5		\$435.00							
	3/3/2020 Healey, Christopher J.	Revise letter regarding Rule 30(b)(6) deposition.	\$870	2		\$1,740.00							
	3/3/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding same.	\$870	0.2		\$174.00							
	3/3/2020 Healey, Christopher J.	Review Sunrise document production.	\$870	1.2		\$1,044.00							
	3/3/2020 Healey, Christopher J.	Revise Rule 30(b)(6) discovery letter.	\$870	1		\$870.00							
	3/3/2020 Healey, Christopher J.	Continue reviewing Sunrise documents.	\$870	2		\$1,740.00							
	3/3/2020 Myrick, Tracy R.	Download defendant production and provide caseteam link to location.	\$195	0.3		\$58.50							
	3/3/2020 Myrick, Tracy R.	Prepare zip file containing images from production SUN013 and email to C. Healey.	\$195	0.3		\$58.50							
	3/3/2020 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location.	\$195	0.3		\$58.50							
	3/3/2020 Myrick, Tracy R.	Convert images to pdfs and email to C. Healey.	\$195	0.5		\$97.50							
	3/4/2020 Healey, Christopher J.	Review and comment on response to Gibson threat letter regarding NY Times article.	\$870	0.3		\$261.00							
	3/5/2020 Cocchia, Robert A.	Review and revise draft correspondence to opposing counsel regarding 30(b)(6) deposition.	\$780	0.3		\$234.00							
	3/5/2020 Cocchia, Robert A.	Review and exchange e-mails with Attorney Healey regarding strategy for 30(b)(6) deposition.	\$780	0.4		\$312.00							
	3/5/2020 Cocchia, Robert A.	Review plaintiff's supplemental production of documents.	\$780	0.5		\$390.00							
	3/5/2020 Cocchia, Robert A.	Update declaration regarding discovery issues and meet and confer efforts and review document production regarding same.	\$780	2.4		\$1,872.00	1	780.00					

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	3/5/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding 30(b)(6) letter.	\$870	0.2	\$174.00								
	3/5/2020 Valero, Carmen A.	Research cases addressing whether expert description of methodology suffices at class cert stage, for C. Healey.	\$360	1	\$360.00								
	3/6/2020 Cocchia, Robert A.	Finalize correspondence to opposing counsel regarding 30(b)(6) deposition.	\$780	0.1	\$78.00								
	3/6/2020 Cocchia, Robert A.	Analyze Sunrise's recent document productions.	\$780	1.1	\$858.00								
	3/6/2020 Cocchia, Robert A.	Review e-mails regarding discovery issues and third party subpoenas.	\$780	0.3	\$234.00								
	3/6/2020 Myrick, Tracy R.	Download defendant production and provide caseteam link to location.	\$195	0.3	\$58.50								
	3/6/2020 Ross, Rachel L.	Legal research re risk of harm as injury	\$405	2.8	\$1,134.00	2.8	1134						
	3/9/2020 Cocchia, Robert A.	Review additional document productions from Sunrise.	\$780	3.6	\$2,808.00								
	3/9/2020 Healey, Christopher J.	Review Sunrise document production.	\$870	2.4	\$2,088.00								
	3/9/2020 Myrick, Tracy R.	Download multiple defendant productions and provide caseteam links to location.	\$195	1.5	\$292.50								
	3/10/2020 Cocchia, Robert A.	Review and exchange e-mails with team regarding discovery issues.	\$780	0.3	\$234.00								
	3/10/2020 Cocchia, Robert A.	Review correspondence from opposing counsel regarding limitations to 30(b)(6) notice.	\$780	0.3	\$234.00								
	3/10/2020 Cocchia, Robert A.	Research regarding Sunrise's efforts to restrict 30(b)(6) discovery and plaintiffs' remedies regarding same.	\$780	1.1	\$858.00								
	3/10/2020 Cocchia, Robert A.	Review draft responses to written discovery.	\$780	0.4	\$312.00								
	3/11/2020 Cocchia, Robert A.	Review correspondence from opposing counsel regarding depositions.	\$780	0.2	\$156.00								
	3/11/2020 Cocchia, Robert A.	Review multiple correspondence regarding 30(b)(6) deposition issues and exchange e-mails with team regarding same.	\$780	0.6	\$468.00								
	3/11/2020 Cocchia, Robert A.	Analysis of Sunrise document production for additional meet and confer.	\$780	2.4	\$1,872.00								
	3/11/2020 Healey, Christopher J.	Prepare memo regarding reply evidence and expert method issues.	\$870	1.4	\$1,218.00								
	3/11/2020 Healey, Christopher J.	Correspondence regarding Rule 30(b)(6) deposition.	\$870	0.1	\$87.00								
	3/11/2020 Healey, Christopher J.	Review and comment regarding discovery responses.	\$870	1.8	\$1,566.00								
	3/11/2020 Healey, Christopher J.	Correspondence regarding 30(b)(6) deposition.	\$870	0.2	\$174.00								
	3/11/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1	\$87.00								
	3/11/2020 Healey, Christopher J.	Prepare correspondence to team regarding deposition.	\$870	0.2	\$174.00								
	3/11/2020 Healey, Christopher J.	Draft response regarding Rule 30(b)(6) deposition.	\$870	0.5	\$435.00								
	3/11/2020 Healey, Christopher J.	Review Gibson letter regarding further Fearn deposition.	\$870	0.1	\$87.00								
	3/12/2020 Cocchia, Robert A.	Review communications from putative class members.	\$780	0.4	\$312.00								
	3/12/2020 Cocchia, Robert A.	Review and exchange emails with team regarding discovery status and tasks.	\$780	0.5	\$390.00								
	3/12/2020 Cocchia, Robert A.	Prepare for further motion practice regarding Sunrise's deficient document production.	\$780	1.1	\$858.00								
	3/12/2020 Cocchia, Robert A.	Analysis of multiple document productions from Sunrise.	\$780	2.5	\$1,950.00								
	3/12/2020 Cocchia, Robert A.	Conference with Ms. Myrick regarding provision of sample data to co-counsel.	\$780	0.2	\$156.00								
	3/12/2020 Cocchia, Robert A.	Telephone conference with Attorney Healey and Attorney Warren regarding discovery and 30(b)(6) issues.	\$780	0.8	\$624.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>		
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>
	3/12/2020 Healey, Christopher J.	Correspondence regarding expert compliance with protective order.	\$870	5.8		\$5,046.00							
	3/12/2020 Healey, Christopher J.	Prepare correspondence regarding document production log.	\$870	0.1		\$87.00							
	3/12/2020 Healey, Christopher J.	Prepare for team call.	\$870	0.2		\$174.00							
	3/12/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding staffing analysis.	\$870	0.2		\$174.00							
	3/12/2020 Healey, Christopher J.	Follow-up correspondence regarding document production.	\$870	0.3		\$261.00							
	3/12/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding case status and expert analysis.	\$870	0.3		\$261.00							
	3/12/2020 Healey, Christopher J.	Telephone conference with Attorneys Warren and Cocchia regarding case status, discovery and deposition preparation.	\$870	0.5		\$435.00							
	3/12/2020 Healey, Christopher J.	Review document production response.	\$870	0.1		\$87.00							
	3/12/2020 Healey, Christopher J.	Prepare correspondence regarding same.	\$870	0.2		\$174.00							
	3/12/2020 Healey, Christopher J.	Revise class certification brief.	\$870	1.2		\$1,044.00							
	3/12/2020 Healey, Christopher J.	Correspondence regarding document source log.	\$870	0.1		\$87.00							
	3/12/2020 Healey, Christopher J.	Prepare correspondence regarding sample data.	\$870	0.2		\$174.00							
	3/12/2020 Healey, Christopher J.	Review document.	\$870	1.7		\$1,479.00							
	3/12/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding to do list.	\$870	0.3		\$261.00							
	3/12/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding time studies from other sources.	\$870	0.3		\$261.00							
	3/12/2020 Myrick, Tracy R.	Work on gathering case materials to send to David Marks.	\$195	1		\$195.00							
	3/12/2020 Myrick, Tracy R.	Review and export file list from Relativity showing defendant productions.	\$195	0.2		\$39.00							
	3/12/2020 Myrick, Tracy R.	Manually add defendant productions to file list and email to caseteam.	\$195	0.8		\$156.00							
	3/12/2020 Myrick, Tracy R.	Provide natives from defendant production to Co-Counsel Brian Umpierre via Accellion for import into Relativity.	\$195	0.3		\$58.50							
	3/12/2020 Myrick, Tracy R.	Provide sample data to D. Marks via Accellion per caseteam.	\$195	0.5		\$97.50							
	3/12/2020 Myrick, Tracy R.	Download defendant production and provide caseteam link to location.	\$195	0.3		\$58.50							
	3/13/2020 Cocchia, Robert A.	Review and exchange e-mails regarding DSS production.	\$780	0.2		\$156.00							
	3/13/2020 Cocchia, Robert A.	Review partial production of documents by opposing counsel regarding DSS.	\$780	0.8		\$624.00							
	3/13/2020 Cocchia, Robert A.	Review and exchange e-mails with team regarding expert witness information.	\$780	0.5		\$390.00							
	3/13/2020 Cocchia, Robert A.	Coordinate transfer of materials to co-counsel for time studies.	\$780	0.6		\$468.00							
	3/13/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding updated class brief and key Colorado cases.	\$870	0.3		\$261.00							
	3/13/2020 Healey, Christopher J.	Correspondence with Ms. Sykes regarding document summary log.	\$870	0.2		\$174.00							
	3/13/2020 Healey, Christopher J.	Telephone conference with Ms. Sykes regarding same.	\$870	0.2		\$174.00							
	3/13/2020 Healey, Christopher J.	Review Sunrise documents.	\$870	1.3		\$1,131.00							
	3/13/2020 Healey, Christopher J.	Prepare correspondence regarding staffing analysis documents.	\$870	0.2		\$174.00							
	3/13/2020 Healey, Christopher J.	Prepare correspondence regarding Sunrise CLM approach and impact on plaintiff's staffing analysis.	\$870	0.2		\$174.00							
	3/13/2020 Healey, Christopher J.	Revise class certification motion.	\$870	0.2		\$174.00							
	3/13/2020 Healey, Christopher J.	Revise class certification motion [courtesy discount - no charge]	\$870	1		\$870.00	1	870.00					
	3/13/2020 Myrick, Tracy R.	Search relativity database and locate La Jolla Floor plans.	\$195	0.5		\$97.50							

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	3/13/2020 Myrick, Tracy R.	Provide various Floor Plans produced by defendants to D. Marks per caseteam.	\$195	0.2		\$39.00									
	3/13/2020 Myrick, Tracy R.	Download third party production and provide caseteam link to location.	\$195	0.3		\$58.50									
	3/13/2020 Sykes, Cheryl E.	Analyzed defendant's document productions revised spreadsheet to include document type and document description in preparation for attorney review.	\$195	1.5		\$292.50									
	3/13/2020 Ross, Rachel L.	Discussion with B. Cocchia re new research assignment relating to arbitration agreement application to certain claims	\$405	0.2		\$81.00		0.2		81					
	3/16/2020 Cocchia, Robert A.	Review final written discovery responses and deposition errata from Plaintiff Ganz.	\$780	0.4		\$312.00									
	3/16/2020 Cocchia, Robert A.	Review and exchange e-mails with team regarding uploading Sunrise document productions and review of same.	\$780	0.5		\$390.00									
	3/16/2020 Healey, Christopher J.	Prepare correspondence regarding Rule 30(b)(6) deposition.	\$870	0.1		\$87.00									
	3/16/2020 Healey, Christopher J.	Review Gibson letter regarding Rule 30(b)(6) deposition.	\$870	0.1		\$87.00									
	3/16/2020 Healey, Christopher J.	Review and revise responses to defendant's interrogatories and document requests.	\$870	0.8		\$696.00									
	3/16/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$870	0.2		\$174.00									
	3/16/2020 Healey, Christopher J.	Correspondence regarding document collection and production.	\$870	0.1		\$87.00									
	3/16/2020 Healey, Christopher J.	Correspondence with Kennedy's office regarding invoice.	\$870	0.1		\$87.00									
	3/16/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding discovery responses.	\$870	0.2		\$174.00									
	3/16/2020 Healey, Christopher J.	Prepare for Rule 30(b)(6) deposition.	\$870	3		\$2,610.00									
	3/16/2020 Ross, Rachel L.	Legal research re risk of harm sufficient to constitute injury in Ninth Circuit	\$405	1.9		\$769.50		1.9		769.5					
	3/17/2020 Cocchia, Robert A.	Analyze Sunrise management agreement and related documents.	\$780	0.8		\$624.00									
	3/17/2020 Cocchia, Robert A.	Review e-mails regarding same.	\$780	0.8		\$624.00									
	3/17/2020 Cocchia, Robert A.	Research in support of discovery motion on ESI.	\$780	2.1		\$1,638.00									
	3/17/2020 Healey, Christopher J.	Prepare for Rule 30(b)(6) deposition	\$870	0.3		\$261.00									
	3/17/2020 Healey, Christopher J.	Research regarding 30(b)(6) deposition rules.	\$870	0.8		\$696.00									
	3/17/2020 Healey, Christopher J.	Draft response to Gibson's 3/16 letter regarding Rule 30(b)(6) deposition.	\$870	0.6		\$522.00									
	3/17/2020 Healey, Christopher J.	Correspondence with Attorneys Marks and Wallace regarding deposition.	\$870	0.1		\$87.00									
	3/17/2020 Healey, Christopher J.	Review management agreement documents.	\$870	2.7		\$2,349.00		1		870.00					
	3/17/2020 Healey, Christopher J.	Prepare correspondence regarding same to team.	\$870	0.5		\$435.00									
	3/17/2020 Healey, Christopher J.	Review Ventas 10-K 2019.	\$870	0.5		\$435.00									
	3/17/2020 Healey, Christopher J.	Review Welltower 10-K 2019.	\$870	0.5		\$435.00									
	3/17/2020 Healey, Christopher J.	Outline document request.	\$870	0.2		\$174.00									
	3/17/2020 Healey, Christopher J.	Review HealthPeak 10-K.	\$870	0.3		\$261.00									
	3/18/2020 Cocchia, Robert A.	Research regarding remote 30(b)(6) deposition.	\$780	0.3		\$234.00									
	3/18/2020 Cocchia, Robert A.	Review Care Labor Management related documents produced by Sunrise.	\$780	0.7		\$546.00									
	3/18/2020 Cocchia, Robert A.	Review and exchange e-mails regarding discovery status.	\$780	0.3		\$234.00									
	3/18/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Rule 30(b)(6) deposition and preparation.	\$870	0.3		\$261.00									
	3/18/2020 Healey, Christopher J.	Review and comment on letter regarding deposition.	\$870	0.1		\$87.00									
	3/18/2020 Healey, Christopher J.	Research regarding videoconference depositions.	\$870	0.2		\$174.00									

	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>
<u>Fees</u>							<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	3/18/2020 Healey, Christopher J.	Prepare correspondence regarding videoconference deposition.	\$870	0.1		\$87.00						
	3/18/2020 Healey, Christopher J.	Prepare correspondence regarding Villa facilities.	\$870	0.2		\$174.00						
	3/18/2020 Healey, Christopher J.	Prepare correspondence to Gibson Firm regarding Rule 30(b)(6) deposition.	\$870	0.4		\$348.00						
	3/18/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00						
	3/18/2020 Healey, Christopher J.	Draft requests for production of documents regarding management and related agreements.	\$870	2		\$1,740.00						
	3/18/2020 Healey, Christopher J.	Prepare correspondence to team regarding status and to-do items.	\$870	0.2		\$174.00						
	3/18/2020 Healey, Christopher J.	Prepare correspondence to Pat Kennedy's office regarding Sunrise documents.	\$870	0.2		\$174.00						
	3/18/2020 Sykes, Cheryl E.	Further analysis of defendant's document productions revised spreadsheet to include document type and document description in preparation for attorney review.	\$195	4.1		\$799.50						
	3/18/2020 Ross, Rachel L.	Legal research re case law addressing issues relating to risk of harm constituting legal injury	\$405	4.2		\$1,701.00	4.2	1701				
	3/19/2020 Cocchia, Robert A.	Telephone conference with team regarding class certification motion and ESI discovery issues.	\$780	0.6		\$468.00						
	3/19/2020 Cocchia, Robert A.	Review draft discovery requests regarding third party agreement.	\$780	0.2		\$156.00						
	3/19/2020 Cocchia, Robert A.	Review and exchange emails regarding third party owner agreements and scheduling issues.	\$780	0.5		\$390.00						
	3/19/2020 Cocchia, Robert A.	Research Central District rules on class certification motions.	\$780	0.3		\$234.00						
	3/19/2020 Healey, Christopher J.	Correspondence with Attorney Cocchia regarding discovery motion to compel.	\$870	0.1		\$87.00						
	3/19/2020 Healey, Christopher J.	Prepare for team call.	\$870	0.2		\$174.00						
	3/19/2020 Healey, Christopher J.	Telephone conference with team regarding Rule 30 deposition, class motion, and status.	\$870	0.7		\$609.00			0.7	609.00		
	3/19/2020 Healey, Christopher J.	Outline key facts/chron from document review.	\$870	1.2		\$1,044.00						
	3/19/2020 Healey, Christopher J.	Prepare correspondence regarding Attorney Gorman's discovery email.	\$870	0.1		\$87.00						
	3/19/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding class certification briefing.	\$870	0.3		\$261.00						
	3/19/2020 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding Gibson discovery inquiry.	\$870	0.1		\$87.00						
	3/19/2020 Healey, Christopher J.	Revise document requests and prepare correspondence regarding same.	\$870	0.4		\$348.00						
	3/19/2020 Healey, Christopher J.	Correspondence regarding plaintiffs' supplemental production.	\$870	0.1		\$87.00						
	3/19/2020 Healey, Christopher J.	Prepare correspondence regarding meet and confer on request for production of documents (4th set).	\$870	0.1		\$87.00						
	3/19/2020 Healey, Christopher J.	Prepare correspondence regarding license requirements for beneficial owners.	\$870	0.2		\$174.00						
	3/19/2020 Myrick, Tracy R.	Upload defendant SUN010 production of text files to shared drive.	\$195	0.2		\$39.00						
	3/19/2020 Myrick, Tracy R.	Upload multiple Plaintiff productions to shared drive and provide link to caseteam, revise production log to reflect recent productions.	\$195	1		\$195.00						
	3/19/2020 Myrick, Tracy R.	Prepare zip file containing Apolinario, Abbie transcript and exhibits and provide to S. Warren.	\$195	0.2		\$39.00						

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	3/19/2020 Sykes, Cheryl E.	Continued analysis of defendant's document productions revised spreadsheet to include document type and document description in preparation for attorney review.	\$195	2.5	\$487.50								
	3/19/2020 Ross, Rachel L.	Legal research re case law expanding on definition of legal injury in class action cases	\$405	4.2	\$1,701.00	4.2	1701						
	3/20/2020 Cocchia, Robert A.	Review correspondence from opposing counsel regarding ESI.	\$780	0.1	\$78.00								
	3/20/2020 Cocchia, Robert A.	Review production of DSS documents and identify documents missing from same.	\$780	1.7	\$1,326.00								
	3/20/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding Rule 30(b)(6) deposition.	\$870	0.1	\$87.00								
	3/20/2020 Healey, Christopher J.	Outline arguments for class certification brief.	\$870	0.2	\$174.00								
	3/20/2020 Healey, Christopher J.	Review background documents to revise Request for Production of Documents, Set 5.	\$870	0.3	\$261.00								
	3/20/2020 Healey, Christopher J.	Revise Request for Production of Documents, Set 5.	\$870	0.2	\$174.00								
	3/20/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1	\$87.00								
	3/20/2020 Healey, Christopher J.	Review correspondence regarding discovery issues.	\$870	0.2	\$174.00								
	3/20/2020 Healey, Christopher J.	Review defendants' DSS production.	\$870	0.5	\$435.00								
	3/20/2020 Myrick, Tracy R.	Upload third party supplemental production with redaction log and provide caseteam link to location.	\$195	0.3	\$58.50								
	3/20/2020 Sykes, Cheryl E.	Continued analysis of defendant's document productions revised spreadsheet to include document type and document description in preparation for attorney review.	\$195	3.6	\$702.00								
	3/21/2020 Healey, Christopher J.	Prepare for Rule 30(b)(6) deposition.	\$870	0.2	\$174.00								
	3/22/2020 Healey, Christopher J.	Review email from Gibson regarding Rule 30(b)(6) deposition.	\$870	0.1	\$87.00								
	3/23/2020 Cocchia, Robert A.	Review transcripts from discovery hearings.	\$780	0.4	\$312.00								
	3/23/2020 Cocchia, Robert A.	Analyze production of DSS documents and draft e-mail to team regarding documents missing from same.	\$780	1.7	\$1,326.00								
	3/23/2020 Healey, Christopher J.	Correspondence regarding deposition scheduling.	\$870	0.2	\$174.00								
	3/23/2020 Sykes, Cheryl E.	Completed analysis of defendant's document productions revised spreadsheet to include document type and document description in preparation for attorney review.	\$195	3.5	\$682.50								
	3/24/2020 Healey, Christopher J.	Correspondence regarding Rule 30(b)(6) deposition.	\$870	0.1	\$87.00								
	3/24/2020 Healey, Christopher J.	Correspondence regarding videoconference logistics.	\$870	0.2	\$174.00								
	3/25/2020 Cocchia, Robert A.	Review e-mail and summary from co-counsel regarding Sunrise master leases and management agreements, and review examples of same for third party control issues.	\$780	0.8	\$624.00								
	3/25/2020 Cocchia, Robert A.	Review and exchange case-related e-mails.	\$780	0.3	\$234.00								
	3/25/2020 Cocchia, Robert A.	Review document production index.	\$780	0.3	\$234.00								
	3/25/2020 Healey, Christopher J.	Correspondence regarding deposition logistics.	\$870	0.1	\$87.00								
	3/25/2020 Healey, Christopher J.	Review deposition notice.	\$870	0.1	\$87.00								
	3/25/2020 Healey, Christopher J.	Prepare correspondence regarding document review issues.	\$870	0.1	\$87.00								
	3/25/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding class certification brief, expert analysis, and discovery.	\$870	0.4	\$348.00								
	3/25/2020 Ross, Rachel L.	Extensive legal research re threat or risk of harm sufficient to constitute injury under federal case law	\$405	3.6	\$1,458.00	1.8	729.00						
	3/26/2020 Cocchia, Robert A.	Review and exchange emails with team regarding discovery issues.	\$780	0.4	\$312.00								
	3/26/2020 Cocchia, Robert A.	Analysis of DSS citation summary data and review document production notes regarding incident reports.	\$780	1.1	\$858.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	3/26/2020 Healey, Christopher J.	Review and approve deposition notice.	\$870	0.1		\$87.00								
	3/26/2020 Healey, Christopher J.	Review summary of DSS citations.	\$870	0.8		\$696.00								
	3/26/2020 Healey, Christopher J.	Prepare correspondence to team regarding follow-up on DSS citations	\$870	0.6		\$522.00								
	3/26/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding discovery meet and confer status.	\$870	0.1		\$87.00								
	3/26/2020 Ross, Rachel L.	Analyze and summarize research findings for risk of injury argument for C. Healey	\$405	3.4		\$1,377.00	3.4	1377						
	3/27/2020 Cocchia, Robert A.	Review correspondence from opposing counsel regarding ESI.	\$780	0.4		\$312.00								
	3/27/2020 Cocchia, Robert A.	Conference with Attorney Healey regarding discovery issues.	\$780	0.4		\$312.00								
	3/27/2020 Cocchia, Robert A.	Draft email to opposing counsel regarding discovery issues.	\$780	0.2		\$156.00								
	3/27/2020 Cocchia, Robert A.	Analyze file regarding status of meet and confer.	\$780	0.3		\$234.00								
	3/27/2020 Cocchia, Robert A.	Analyze Sunrise's document production regarding new staffing formula and time studies.	\$780	1.3		\$1,014.00								
	3/27/2020 Cocchia, Robert A.	Telephone call to opposing counsel regarding protective order.	\$780	0.1		\$78.00								
	3/27/2020 Cocchia, Robert A.	Review draft redlines of protective order regarding Exhibit A.	\$780	0.4		\$312.00								
	3/27/2020 Healey, Christopher J.	Telephone conferences with Attorney Marks regarding protective order and expert analysis.	\$870	0.5		\$435.00								
	3/27/2020 Healey, Christopher J.	Office conference with Attorney Cocchia regarding correction to protective order acknowledgment form.	\$870	0.1		\$87.00								
	3/27/2020 Healey, Christopher J.	Correspondence regarding Sunrise data production for sample facilities.	\$870	0.4		\$348.00								
	3/27/2020 Healey, Christopher J.	Review Yarnell correspondence regarding Villa comments.	\$870	0.1		\$87.00								
	3/27/2020 Healey, Christopher J.	Prepare correspondence regarding same.	\$870	0.1		\$87.00								
	3/27/2020 Healey, Christopher J.	Draft supporting declaration to class certification motion.	\$870	0.6		\$522.00								
	3/27/2020 Myrick, Tracy R.	Gather, organize and prepare encrypted zip files containing various defendant productions and provide to D. Marks, B. Peters and J. Thornton via Accellion.	\$195	2		\$390.00								
	3/27/2020 Ross, Rachel L.	Legal research re whether arbitration clause may apply to harm that occurred prior to signing agreement	\$405	2.3		\$931.50	2.3	931.5						
	3/28/2020 Healey, Christopher J.	Prepare for Rule 30(b)(6) deposition.	\$870	0.7		\$609.00								
	3/28/2020 Healey, Christopher J.	Review Attorney Wallace's comments to draft class brief and respond regarding same.	\$870	1		\$870.00								
	3/28/2020 Healey, Christopher J.	Review summary of executive director deposition Joseph Villanueva.	\$870	0.5		\$435.00								
	3/28/2020 Healey, Christopher J.	Revise supporting Healey declaration to include Villanueva testimony.	\$870	0.7		\$609.00								
	3/29/2020 Healey, Christopher J.	Review Apolinario deposition transcript.	\$870	1		\$870.00								
	3/29/2020 Healey, Christopher J.	Insert Apolinario testimony points to Healey declaration.	\$870	1.3		\$1,131.00								
	3/29/2020 Healey, Christopher J.	Further revisions to Healey declaration.	\$870	2.2		\$1,914.00								
	3/29/2020 Healey, Christopher J.	Analysis regarding Sunrise's form admission agreements.	\$870	0.7		\$609.00								
	3/30/2020 Ahmadian, Saeid R.	Continue to assist attorney Healey with data received from opposing counsel.	\$330	0.3		\$99.00	0.3	99						
	3/30/2020 Ahmadian, Saeid R.	Review and analyze Excel file and prepare data summaries.	\$330	4		\$1,320.00	4	1320						
	3/30/2020 Cocchia, Robert A.	Draft comments in response to Sunrise's 3-27-20 correspondence regarding ESI production, analyze prior correspondence regarding same.	\$780	0.3		\$234.00								
	3/30/2020 Cocchia, Robert A.	Review documents produced since 2-5-20 letter regarding same.	\$780	2.4		\$1,872.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>			
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	3/30/2020 Cocchia, Robert A.	Telephone call to opposing counsel regarding the protective order.	\$780	0.2		\$156.00								
	3/30/2020 Cocchia, Robert A.	Draft language for proposed joint stipulation amending the protective order.	\$780	0.5		\$390.00								
	3/30/2020 Cocchia, Robert A.	Review and exchange emails with team regarding assessment information produced by Sunrise.	\$780	0.3		\$234.00								
	3/30/2020 Cocchia, Robert A.	Brief review of actual target spreadsheet.	\$780	0.4		\$312.00								
	3/30/2020 Cocchia, Robert A.	Review database and forwarded spreadsheet regarding contract labor to Attorney Healey.	\$780	0.4		\$312.00								
	3/30/2020 Healey, Christopher J.	Review Attorney Gorman letter regarding Fearn's deposition.	\$870	0.1		\$87.00								
	3/30/2020 Healey, Christopher J.	Review Gibson letter regarding ESI.	\$870	0.2		\$174.00								
	3/30/2020 Healey, Christopher J.	Outline response regarding same.	\$870	1		\$870.00								
	3/30/2020 Healey, Christopher J.	Review Sunrise document production 19.	\$870	3		\$2,610.00								
	3/30/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding class brief, staffing analysis.	\$870	0.5		\$435.00								
	3/30/2020 Healey, Christopher J.	Review analysis of Actual/Target spreadsheet.	\$870	0.7		\$609.00								
	3/30/2020 Healey, Christopher J.	Telephone conferences regarding same.	\$870	0.2		\$174.00								
	3/30/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding updated analysis of Actual/Target spreadsheet.	\$870	0.3		\$261.00								
	3/30/2020 Healey, Christopher J.	Correspondence regarding McGill/Rent-a-Center public injunction carve out for injunction relief.	\$870	0.2		\$174.00								
	3/30/2020 Healey, Christopher J.	Review defendants' intent to seek redaction.	\$870	0.1		\$87.00								
	3/30/2020 Healey, Christopher J.	Revise Actual/Target staff spreadsheet.	\$870	0.6		\$522.00								
	3/30/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.4		\$348.00								
	3/30/2020 Myrick, Tracy R.	Download defendant production and provide caseteam link to location.	\$195	0.5		\$97.50								
	3/30/2020 Myrick, Tracy R.	Update internal production log.	\$195	0.5		\$97.50								
	3/30/2020 Myrick, Tracy R.	Prepare zip file containing J. Villanueva deposition transcript and exhibits and provide to S. Warren via Accellion.	\$195	0.3		\$58.50								
	3/30/2020 Myrick, Tracy R.	Prepare encrypted zip file containing Task Time data and transfer to D. Marks, B. Peters and J. Thorton, via Accellion.	\$195	0.5		\$97.50								
	3/31/2020 Cocchia, Robert A.	Review and revise draft correspondence to Sunrise regarding production of assessment information in database form.	\$780	1.2		\$936.00								
	3/31/2020 Cocchia, Robert A.	Review and exchange e-mails with team regarding assessment information and discovery status.	\$780	0.6		\$468.00								
	3/31/2020 Cocchia, Robert A.	Review Sunrise's request for redaction of hearing transcript and review procedures from Court's March 23, 2020 order.	\$780	0.5		\$390.00								
	3/31/2020 Cocchia, Robert A.	Email Attorney Healey regarding redaction request from Sunrise.	\$780	0.2		\$156.00								
	3/31/2020 Healey, Christopher J.	Review updated class certification brief.	\$870	0.4		\$348.00								
	3/31/2020 Healey, Christopher J.	Draft to-do list regarding class brief.	\$870	0.2		\$174.00								
	3/31/2020 Healey, Christopher J.	Prepare correspondence regarding changes to class brief.	\$870	0.1		\$87.00								
	3/31/2020 Healey, Christopher J.	Review and respond to Attorney Marks' letter regarding data issues and expert analysis.	\$870	0.3		\$261.00								
	3/31/2020 Healey, Christopher J.	Correspondence regarding deposition preparation.	\$870	0.2		\$174.00								
	3/31/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding staffing data issues.	\$870	0.2		\$174.00								
	3/31/2020 Healey, Christopher J.	Prepare for Rule 30(b)(6) deposition and prepare list of deposition exhibits.	\$870	4.2		\$3,654.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	3/31/2020 Healey, Christopher J.	Telephone message from Attorney Warren regarding videoconference deposition.	\$870	0.2		\$174.00								
	3/31/2020 Healey, Christopher J.	Review and respond to Attorney Marks' questions regarding Sunrise staffing documentation.	\$870	1		\$870.00								
	3/31/2020 Myrick, Tracy R.	Upload E. Ganz deposition transcript to shared drive and provide caseteam link to location, update deposition log.	\$195	0.3		\$58.50								
	3/31/2020 Myrick, Tracy R.	Prepare zip file of deposition transcripts and provide to B. Umpierre via Accellion.	\$195	0.3		\$58.50								
	4/1/2020 Cocchia, Robert A.	Review and exchange emails with team regarding Sunrise's notice of redaction of hearing transcript.	\$780	0.4		\$312.00								
	4/1/2020 Cocchia, Robert A.	Telephone call to opposing counsel regarding request to redact hearing transcript.	\$780	0.1		\$78.00								
	4/1/2020 Cocchia, Robert A.	Review and exchange multiple emails with team regarding discovery issues and document review.	\$780	0.7		\$546.00								
	4/1/2020 Cocchia, Robert A.	Research light duty designation and Sunrise's prior testimony and documents regarding same.	\$780	1.3		\$1,014.00								
	4/1/2020 Cocchia, Robert A.	Revise omnibus declaration regarding discovery issues and communications with opposing counsel.	\$780	0.8		\$624.00								
	4/1/2020 Healey, Christopher J.	Correspondence with Attorneys Marks and Wallace regarding deposition preparation.	\$870	0.2		\$174.00								
	4/1/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding background facts for class certification brief.	\$870	0.2		\$174.00								
	4/1/2020 Healey, Christopher J.	Correspondence regarding Gibson notice to redact transcript.	\$870	0.1		\$87.00								
	4/1/2020 Healey, Christopher J.	Review defendant's documents for Rule 30(b)(6) deposition.	\$870	4.4		\$3,828.00								
	4/1/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding data analysis question for deposition.	\$870	0.3		\$261.00								
	4/1/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery responses.	\$870	0.1		\$87.00								
	4/1/2020 Healey, Christopher J.	Prepare for Rule 30(b)(6) deposition.	\$870	1		\$870.00								
	4/1/2020 Healey, Christopher J.	Correspondence regarding Rule 30(b)(6) deposition preparation.	\$870	0.1		\$87.00								
	4/1/2020 Healey, Christopher J.	Participate in videoconference deposition training.	\$870	0.5		\$435.00								
	4/1/2020 Healey, Christopher J.	Prepare correspondence to team regarding manual.	\$870	0.2		\$174.00								
	4/1/2020 Myrick, Tracy R.	Work on gathering potential exhibits for upcoming deposition.	\$195	2.8		\$546.00								
	4/1/2020 Myrick, Tracy R.	Work with office services regarding same.	\$195	0.2		\$39.00								
	4/1/2020 Myrick, Tracy R.	Attend training with C. Healey and TSG Reporting regarding upcoming remote video deposition.	\$195	0.7		\$136.50								
	4/1/2020 Myrick, Tracy R.	Work on flattening several exhibit pdf files to comply with TSG data size limit for exhibits.	\$195	0.5		\$97.50								
	4/2/2020 Cocchia, Robert A.	Telephone conference with opposing counsel regarding ESI and protective order issues.	\$780	0.3		\$234.00								
	4/2/2020 Cocchia, Robert A.	Review and exchange emails with team regarding discovery issues. Analyze correspondence from Sunrise regarding 30(b)(6) deposition and request for extension of time and internal team e-mails regarding same.	\$780	0.5		\$390.00								
	4/2/2020 Cocchia, Robert A.	Analyze draft meet and confer letter to Sunrise regarding ESI and conduct research regarding obligations under federal rules for responding party to search for ESI.	\$780	0.4		\$312.00								
	4/2/2020 Cocchia, Robert A.		\$780	2.3		\$1,794.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/2/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding key documents.	\$870	0.1		\$87.00								
	4/2/2020 Healey, Christopher J.	Correspondence regarding deposition exhibits.	\$870	0.1		\$87.00								
	4/2/2020 Healey, Christopher J.	Correspondence from Attorney Cocchia regarding discovery issues.	\$870	0.1		\$87.00								
	4/2/2020 Healey, Christopher J.	Correspondence regarding deposition preparation.	\$870	0.3		\$261.00								
	4/2/2020 Healey, Christopher J.	Outline response regarding meet and confer regarding ESI and related issues.	\$870	2.6		\$2,262.00								
	4/2/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00								
	4/2/2020 Healey, Christopher J.	Correspondence regarding census data.	\$870	0.1		\$87.00								
	4/2/2020 Myrick, Tracy R.	Transfer operation manuals to D. Marks and J. Thornton via Accellion.	\$195	0.6		\$117.00								
	4/2/2020 Myrick, Tracy R.	Transfer various deposition exhibits to L. Petite via Accellion.	\$195	0.7		\$136.50								
	4/2/2020 Myrick, Tracy R.	Continue to work on gathering exhibits for upcoming video deposition.	\$195	1		\$195.00								
	4/3/2020 Cocchia, Robert A.	Participate in multiple team telephone conferences regarding discovery and class certification briefing issues.	\$780	1.3		\$1,014.00								
	4/3/2020 Cocchia, Robert A.	Telephone conference with Attorney Healey regarding strategy on 30(b)(6) deposition and draft email to Attorney Healey regarding same.	\$780	0.7		\$546.00								
	4/3/2020 Cocchia, Robert A.	Review draft response to opposing counsel regarding ESI discovery.	\$780	0.3		\$234.00								
	4/3/2020 Cocchia, Robert A.	Review Shiferaw files regarding class certification issues.	\$780	1.2		\$936.00								
	4/3/2020 Healey, Christopher J.	Review defendant's letter withdrawing Rule 30(b)(6) deposition.	\$870	0.2		\$174.00								
	4/3/2020 Healey, Christopher J.	Correspondence with team regarding same.	\$870	0.1		\$87.00								
	4/3/2020 Healey, Christopher J.	Outline potential options.	\$870	0.5		\$435.00								
	4/3/2020 Healey, Christopher J.	Correspondence regarding deposition procedures under COVID-19 crisis.	\$870	0.2		\$174.00								
	4/3/2020 Healey, Christopher J.	Telephone conference with Lindsay Pettite regarding case background.	\$870	1		\$870.00								
	4/3/2020 Healey, Christopher J.	Review Attorney Warren's correspondence regarding negative outcome.	\$870	0.1		\$87.00								
	4/3/2020 Healey, Christopher J.	Follow-up correspondence with Lindsay Pettite.	\$870	0.1		\$87.00								
	4/3/2020 Healey, Christopher J.	Telephone conference with team regarding ESI discovery motion.	\$870	0.5		\$435.00			0.5	435.00				
	4/3/2020 Healey, Christopher J.	Telephone conference with Attorneys Wallace and Marks regarding deposition and class motion issues.	\$870	0.9		\$783.00								
	4/3/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding class filing and deposition issues.	\$870	0.5		\$435.00								
	4/3/2020 Myrick, Tracy R.	Transfer various defendant production files to D. Marks and J. Thornton via Accellion.	\$195	0.5		\$97.50								
	4/3/2020 Myrick, Tracy R.	Prepare save search in Relativity regarding same.	\$195	0.2		\$39.00								
	4/3/2020 Myrick, Tracy R.	Organization and preparation of exhibits to be used at 4/8/2020 video deposition.	\$195	1		\$195.00								
	4/5/2020 Healey, Christopher J.	Analysis memo regarding class certification brief, timing and discovery issues.	\$870	1.2		\$1,044.00								
	4/5/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$870	0.3		\$261.00								
	4/5/2020 Healey, Christopher J.	Review documents regarding per resident payment issue.	\$870	0.2		\$174.00								
	4/5/2020 Healey, Christopher J.	Telephone conferences with Attorney Wallace regarding class brief and discovery issues.	\$870	1		\$870.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/5/2020 Healey, Christopher J.	Outline support for class brief.	\$870	0.5		\$435.00								
	4/5/2020 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding status.	\$870	0.2		\$174.00								
	4/5/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding key exhibits.	\$870	0.3		\$261.00								
	4/5/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding sample data issue.	\$870	0.1		\$87.00								
	4/5/2020 Myrick, Tracy R.	Transfer Slichta May 2016 re compliance with target staffing levels via Accellion to G. Wallace.	\$195	0.2		\$39.00								
	4/6/2020 Cocchia, Robert A.	Telephone conference with Attorney Warren regarding meet and confer response on ESI issues.	\$780	0.3		\$234.00								
	4/6/2020 Cocchia, Robert A.	Review and exchange emails with Attorney Healey regarding support for class certification motion.	\$780	0.5		\$390.00								
	4/6/2020 Cocchia, Robert A.	Analysis of issue regarding labor detail reports and review past correspondence with opposing counsel regarding same.	\$780	0.8		\$624.00								
	4/6/2020 Cocchia, Robert A.	Telephone call to opposing counsel regarding production of electronic data and draft email to opposing counsel regarding same.	\$780	0.4		\$312.00								
	4/6/2020 Cocchia, Robert A.	Analysis of spreadsheet regarding billed services history and internal team emails regarding same.	\$780	0.6		\$468.00								
	4/6/2020 Healey, Christopher J.	Correspondence regarding privilege log.	\$870	0.1		\$87.00								
	4/6/2020 Healey, Christopher J.	Review letter regarding schedule extension.	\$870	0.1		\$87.00								
	4/6/2020 Healey, Christopher J.	Review Attorney Wallace comments regarding class brief and update class brief.	\$870	0.3		\$261.00								
	4/6/2020 Healey, Christopher J.	Prepare correspondence to Lindsay Petite regarding per resident billing and review evidence regarding same.	\$870	0.8		\$696.00								
	4/6/2020 Healey, Christopher J.	Revise Healey supporting declaration.	\$870	0.2		\$174.00								
	4/6/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding budget/variance and related document.	\$870	0.3		\$261.00								
	4/6/2020 Healey, Christopher J.	Review file regarding same.	\$870	0.5		\$435.00								
	4/6/2020 Healey, Christopher J.	Review file regarding timing of move-in fee.	\$870	0.5		\$435.00								
	4/6/2020 Healey, Christopher J.	Review documents regarding additional deposition exhibits.	\$870	1.2		\$1,044.00								
	4/6/2020 Healey, Christopher J.	Prepare correspondence regarding executive director business plan.	\$870	0.3		\$261.00								
	4/6/2020 Healey, Christopher J.	Review documents regarding deposition preparation.	\$870	1		\$870.00								
	4/7/2020 Healey, Christopher J.	Revise class certification motion.	\$870	1		\$870.00								
	4/7/2020 Healey, Christopher J.	Review preliminary staffing analysis.	\$870	1		\$870.00								
	4/7/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding same and follow-up analysis.	\$870	0.7		\$609.00								
	4/7/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding preliminary staffing analysis and class certification issues.	\$870	0.2		\$174.00								
	4/7/2020 Healey, Christopher J.	Review actual/target spreadsheet and outline follow-up analysis.	\$870	1		\$870.00								
	4/7/2020 Healey, Christopher J.	Correspondence regarding follow-up analysis on actual/target staffing data.	\$870	0.2		\$174.00								
	4/7/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding actual/target spreadsheet and follow-up analysis.	\$870	0.5		\$435.00								
	4/7/2020 Myrick, Tracy R.	Review document productions in Relativity and provide Co-Counsel with list of productions that are missing.	\$195	0.5		\$97.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/7/2020 Ross, Rachel L.	Legal research re claims outside the scope of an arbitration agreement when they arise before signing the underlying agreement	\$405	1.1		\$445.50		1.1	445.5						
	4/8/2020 Cocchia, Robert A.	Revise joint stipulation regarding amendments to protective order.	\$780	0.8		\$624.00									
	4/8/2020 Cocchia, Robert A.	Draft revised exhibit A to protective order and review and exchange emails regarding same.	\$780	0.7		\$546.00									
	4/8/2020 Cocchia, Robert A.	Review preliminary staffing analysis and emails regarding same.	\$780	0.8		\$624.00									
	4/8/2020 Cocchia, Robert A.	Analysis of light duty restrictions from former testimony.	\$780	0.9		\$702.00									
	4/8/2020 Cocchia, Robert A.	Review Sunrise document production for support on ESI meet and confer letter.	\$780	1.5		\$1,170.00									
	4/8/2020 Cocchia, Robert A.	Review district court procedures for ex parte applications or joint submissions in light of COVID-19 restrictions.	\$780	0.5		\$390.00									
	4/8/2020 Healey, Christopher J.	Office conference regarding court availability for ex parte request.	\$870	0.1		\$87.00									
	4/8/2020 Healey, Christopher J.	Review correspondence regarding case schedule.	\$870	0.1		\$87.00									
	4/8/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding sample data and missing information.	\$870	0.1		\$87.00									
	4/8/2020 Healey, Christopher J.	Prepare correspondence regarding class member call ins.	\$870	0.2		\$174.00									
	4/8/2020 Healey, Christopher J.	Prepare correspondence to team regarding preliminary staffing analysis.	\$870	0.5		\$435.00									
	4/8/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1		\$87.00									
	4/8/2020 Healey, Christopher J.	Prepare correspondence regarding Light Duty search.	\$870	0.1		\$87.00									
	4/8/2020 Healey, Christopher J.	Telephone conference with expert Kennedy regarding expert damage analysis.	\$870	0.5		\$435.00									
	4/8/2020 Healey, Christopher J.	Review Attorney Marks staff analysis regarding all facilities.	\$870	0.2		\$174.00									
	4/8/2020 Healey, Christopher J.	Prepare correspondence to team regarding update analysis regarding staffing issues.	\$870	1.2		\$1,044.00									
	4/8/2020 Healey, Christopher J.	Prepare correspondence regarding potential extrapolation approach with staffing results.	\$870	0.3		\$261.00									
	4/8/2020 Healey, Christopher J.	Draft summary of key information regarding facilities.	\$870	0.8		\$696.00									
	4/8/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding case schedule and extension request.	\$870	0.2		\$174.00									
	4/8/2020 Healey, Christopher J.	Draft background section regarding extension request.	\$870	0.5		\$435.00									
	4/8/2020 Healey, Christopher J.	Correspondence regarding expert expenses and correspondence to team regarding expert expenses and shares.	\$870	0.3		\$261.00									
	4/8/2020 Myrick, Tracy R.	Update production log to reflect additional Plaintiff productions.	\$195	0.3		\$58.50									
	4/9/2020 Cocchia, Robert A.	Telephone conference with Attorney Warren regarding ESI discovery issues.	\$780	0.3		\$234.00									
	4/9/2020 Cocchia, Robert A.	Revise draft meet and confer letter regarding ESI issues.	\$780	1		\$780.00									
	4/9/2020 Cocchia, Robert A.	Analysis of Shiferaw file regarding "light duty" staff and draft email to Attorney Healey regarding same.	\$780	1.3		\$1,014.00									
	4/9/2020 Cocchia, Robert A.	Review correspondence with opposing counsel, attorney notes and court filings regarding scope of documents to be produced in response to 1/31/20 order.	\$780	1.2		\$936.00									
	4/9/2020 Cocchia, Robert A.	Highlight testimony of Ms. Pacheco and forward same to Attorney Healey.	\$780	0.5		\$390.00									
	4/9/2020 Cocchia, Robert A.	Brief review of Sunrise 4/09/20 production.	\$780	0.4		\$312.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/9/2020 Cocchia, Robert A.	Finalize joint stipulation and order regarding protective order amendment and draft email to opposing counsel regarding same.	\$780	1.5		\$1,170.00								
	4/9/2020 Healey, Christopher J.	Draft correspondence to Gibson firm regarding class certification schedule and meet and confer.	\$870	0.1		\$87.00								
	4/9/2020 Healey, Christopher J.	Prepare correspondence to team regarding discovery issues.	\$870	0.1		\$87.00								
	4/9/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding meet and confer approach.	\$870	0.1		\$87.00								
	4/9/2020 Healey, Christopher J.	Correspondence regarding privilege log request,	\$870	0.2		\$174.00								
	4/9/2020 Healey, Christopher J.	Review defendant's response to class motion extension.	\$870	0.1		\$87.00								
	4/9/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding options regarding response.	\$870	0.2		\$174.00								
	4/9/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding same.	\$870	0.1		\$87.00								
	4/9/2020 Healey, Christopher J.	Prepare correspondence to Attorney Thamer regarding Sunrise staffing approach.	\$870	0.2		\$174.00								
	4/9/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Flores billing and correspondence regarding same.	\$870	0.1		\$87.00								
	4/9/2020 Healey, Christopher J.	Correspondence with Attorney Thamer regarding Sunrise staffing model issues.	\$870	0.2		\$174.00								
	4/9/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00								
	4/9/2020 Healey, Christopher J.	Prepare correspondence regarding ESI protocol to Attorney Cocchia.	\$870	0.2		\$174.00								
	4/9/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding Daily Loan Report and discovery request.	\$870	0.2		\$174.00								
	4/9/2020 Healey, Christopher J.	Revise class certification motion.	\$870	2.4		\$2,088.00								
	4/9/2020 Healey, Christopher J.	Review Sunrise production 20 and outline key documents.	\$870	0.5		\$435.00								
	4/9/2020 Healey, Christopher J.	Correspondence regarding deposition and class motion schedule.	\$870	0.1		\$87.00								
	4/9/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding stipulation regarding class schedule.	\$870	0.2		\$174.00								
	4/9/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding schedule stipulation and staffing analysis.	\$870	0.6		\$522.00								
	4/9/2020 Healey, Christopher J.	Research regarding NC staffing standard.	\$870	0.5		\$435.00								
	4/9/2020 Healey, Christopher J.	Draft to-do list regarding class motion.	\$870	0.1		\$87.00								
	4/9/2020 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location.	\$195	0.3		\$58.50								
	4/9/2020 Myrick, Tracy R.	Update production log regarding same.	\$195	0.2		\$39.00								
	4/9/2020 Myrick, Tracy R.	Upload various plaintiff productions to shared drive and update production log regarding same.	\$195	0.6		\$117.00								
	4/9/2020 Myrick, Tracy R.	Prepare search in Relativity regarding Light Duty and export list of files.	\$195	0.2		\$39.00								
	4/10/2020 Cocchia, Robert A.	Telephone conference with Attorney Warren regarding discovery issues.	\$780	0.3		\$234.00								
	4/10/2020 Cocchia, Robert A.	Draft meet and confer letter regarding ESI issues and forward same to Attorney Healey for review.	\$780	1.7		\$1,326.00								
	4/10/2020 Cocchia, Robert A.	Review and exchange emails with team regarding same.	\$780	0.4		\$312.00								
	4/10/2020 Cocchia, Robert A.	Review correspondence from opposing counsel regarding format of assessment and service plan information and review and exchange emails with team regarding same.	\$780	0.5		\$390.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/10/2020 Cocchia, Robert A.	Prepare response to Sunrise 4/10/20 correspondence.	\$780	1.3		\$1,014.00								
	4/10/2020 Healey, Christopher J.	Outline analysis regarding potential flaws in Sunrise model.	\$870	0.2		\$174.00								
	4/10/2020 Healey, Christopher J.	Review and revise draft stipulation regarding extension.	\$870	0.4		\$348.00								
	4/10/2020 Healey, Christopher J.	Prepare correspondence regarding same to team.	\$870	0.1		\$87.00								
	4/10/2020 Healey, Christopher J.	Correspondence regarding stipulation on class motion schedule.	\$870	0.2		\$174.00								
	4/10/2020 Healey, Christopher J.	Draft summary of Sunrise staffing approach.	\$870	1		\$870.00								
	4/10/2020 Healey, Christopher J.	Draft correspondence regarding potential flaws in Sunrise's approach.	\$870	1.5		\$1,305.00								
	4/10/2020 Healey, Christopher J.	Review documents regarding deposition preparation.	\$870	0.5		\$435.00								
	4/10/2020 Myrick, Tracy R.	Provide pages from Fair Oaks AHCA application to C. Healey.	\$195	0.2		\$39.00								
	4/10/2020 Sykes, Cheryl E.	Analyzed documents to assist attorney to prepare for case plan.	\$195	0.6		\$117.00								
	4/11/2020 Healey, Christopher J.	Draft inserts to supporting declarations to class motion.	\$870	3.2		\$2,784.00								
	4/11/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding DLR production.	\$870	0.1		\$87.00								
	4/11/2020 Healey, Christopher J.	Prepare correspondence to Attorney Yarnell regarding DSS citations.	\$870	0.1		\$87.00								
	4/11/2020 Healey, Christopher J.	Outline to-do items for class certification motion and discovery.	\$870	0.2		\$174.00								
	4/11/2020 Healey, Christopher J.	Prepare correspondence to Attorney Arns regarding potential deposition.	\$870	0.1		\$87.00								
	4/11/2020 Healey, Christopher J.	Outline inserts to Healey supporting declaration/brief regarding common policies.	\$870	0.2		\$174.00								
	4/11/2020 Healey, Christopher J.	Revise supporting declaration.	\$870	1.6		\$1,392.00								
	4/12/2020 Healey, Christopher J.	Revise supporting declaration.	\$870	2		\$1,740.00								
	4/12/2020 Healey, Christopher J.	Outline summary of cited deposition testimony and prepare correspondence regarding same.	\$870	0.3		\$261.00								
	4/12/2020 Healey, Christopher J.	Prepare to-do items for Rule 30(b)(6) deposition.	\$870	0.2		\$174.00								
	4/12/2020 Healey, Christopher J.	Revise deposition index.	\$870	0.2		\$174.00								
	4/13/2020 Cocchia, Robert A.	Review and exchange emails with opposing counsel regarding court filings.	\$780	0.4		\$312.00								
	4/13/2020 Cocchia, Robert A.	Review proposed redactions from 1/23/20 hearing transcript to be filed under seal and analysis of disclosure of Sunrise's task time studies in prior court filings.	\$780	1.4		\$1,092.00								
	4/13/2020 Cocchia, Robert A.	Review and exchange emails with team regarding motion for class certification, discovery and ongoing meet and confer efforts.	\$780	1		\$780.00								
	4/13/2020 Cocchia, Robert A.	Review analysis of Sunrise's claim regarding production of assessment and service plan information in pdf form and research same.	\$780	0.8		\$624.00								
	4/13/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding DLR request.	\$870	0.1		\$87.00								
	4/13/2020 Healey, Christopher J.	Review correspondence from Attorney Marks regarding DLR request.	\$870	0.1		\$87.00								
	4/13/2020 Healey, Christopher J.	Prepare correspondence to team regarding April 30 deposition and draft list of additional deposition exhibits.	\$870	0.5		\$435.00								
	4/13/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding exhibit showing residency agreements.	\$870	0.5		\$435.00								
	4/13/2020 Healey, Christopher J.	Revise Healey declaration.	\$870	0.2		\$174.00								
	4/13/2020 Healey, Christopher J.	Prepare correspondence regarding potential arguments on staffing analysis.	\$870	0.1		\$87.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/13/2020 Healey, Christopher J.	Review insert regarding DSS citations.	\$870	0.8		\$696.00								
	4/13/2020 Healey, Christopher J.	Telephone conference with Attorney Yarnell regarding DSS												
	4/13/2020 Healey, Christopher J.	ctiations.	\$870	0.5		\$435.00								
	4/13/2020 Healey, Christopher J.	Revise DSS citations insert.	\$870	1.5		\$1,305.00								
	4/13/2020 Healey, Christopher J.	Prepare correspondence to Attorney Yarnell regarding follow-up on												
	4/13/2020 Healey, Christopher J.	DSS citations.	\$870	0.3		\$261.00								
	4/13/2020 Healey, Christopher J.	Review Attorney Marks' response regarding searchable PDFs.	\$870	0.1		\$87.00								
	4/13/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding meet and												
	4/13/2020 Healey, Christopher J.	confer letter regarding same.	\$870	0.2		\$174.00								
	4/13/2020 Healey, Christopher J.	Review Gibson's refusal to stipulate to briefing schedule.	\$870	0.1		\$87.00								
	4/13/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding same.	\$870	0.2		\$174.00								
	4/13/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding staffing												
	4/13/2020 Healey, Christopher J.	analysis.	\$870	0.1		\$87.00								
	4/13/2020 Healey, Christopher J.	Prepare correspondence to team.	\$870	0.1		\$87.00								
	4/13/2020 Myrick, Tracy R.	Organization and preparation of exhibits to be used at Rule 306b												
	4/13/2020 Myrick, Tracy R.	video deposition.	\$195	0.7		\$136.50								
	4/13/2020 Sykes, Cheryl E.	Analyzed deposition testimony and revised deposition summary												
	4/13/2020 Sykes, Cheryl E.	with cites in support of our motion for class certification	\$195	0.7		\$136.50								
	4/14/2020 Cocchia, Robert A.	Telephone conference with Attorney Healey regarding class												
	4/14/2020 Cocchia, Robert A.	certification argument and discovery issues.	\$780	0.6		\$468.00								
	4/14/2020 Cocchia, Robert A.	Participate in team call regarding class certification strategies.	\$780	1.1		\$858.00								
	4/14/2020 Cocchia, Robert A.	Review Sunrise filing regarding redaction of 1/23/20 hearing												
	4/14/2020 Cocchia, Robert A.	transcript.	\$780	0.2		\$156.00								
	4/14/2020 Cocchia, Robert A.	Research legal standard, cases cited by Sunrise and issues regarding												
	4/14/2020 Cocchia, Robert A.	redaction of hearing transcript and draft opposition to redaction	\$780	2.2		\$1,716.00								
	4/14/2020 Cocchia, Robert A.	request.												
	4/14/2020 Cocchia, Robert A.	Finalize and file joint stipulation regarding amended protective												
	4/14/2020 Cocchia, Robert A.	order.	\$780	0.4		\$312.00								
	4/14/2020 Healey, Christopher J.	Outline Flores declaration.	\$870	0.1		\$87.00								
	4/14/2020 Healey, Christopher J.	Review and revise ESI meet and confer letter.	\$870	1.2		\$1,044.00								
	4/14/2020 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding discovery												
	4/14/2020 Healey, Christopher J.	issues.	\$870	0.5		\$435.00								
	4/14/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding extension												
	4/14/2020 Healey, Christopher J.	issue.	\$870	0.2		\$174.00								
	4/14/2020 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding staffing												
	4/14/2020 Healey, Christopher J.	analysis.	\$870	0.1		\$87.00								
	4/14/2020 Healey, Christopher J.	Prepare for team call regarding Sunrise staffing issues.	\$870	0.3		\$261.00								
	4/14/2020 Healey, Christopher J.	Conference call with Attorneys Marks and Thamer regarding Sunrise												
	4/14/2020 Healey, Christopher J.	staffing approach.	\$870	1		\$870.00								
	4/14/2020 Healey, Christopher J.	Follow-up call with Attorney Marks regarding same.	\$870	0.3		\$261.00								
	4/14/2020 Healey, Christopher J.	Correspondence regarding service level data.	\$870	0.2		\$174.00								
	4/14/2020 Healey, Christopher J.	Review Sunrise staffing documents.	\$870	0.2		\$174.00								
	4/14/2020 Healey, Christopher J.	Review correspondence regarding case schedule.	\$870	0.1		\$87.00								
	4/14/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding schedule												
	4/14/2020 Healey, Christopher J.	extension.	\$870	0.2		\$174.00								
	4/14/2020 Healey, Christopher J.	Review hearing transcript regarding task time staff.	\$870	0.5		\$435.00								
	4/14/2020 Healey, Christopher J.	Review key documents.	\$870	2		\$1,740.00								
	4/14/2020 Myrick, Tracy R.	Transfer SUN0017869 D. Marks, J. Thornton and G. Wallace via												
	4/14/2020 Myrick, Tracy R.	Accellion.	\$195	0.3		\$58.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>			
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/14/2020 Myrick, Tracy R.	Upload Ganz and Fearn's deposition transcript to shared drive and provide link to caseteam.	\$195	0.2		\$39.00								
	4/14/2020 Sykes, Cheryl E.	Analyzed deposition testimony and revised deposition summary with cites in support of our motion for class certification	\$195	1.4		\$273.00								
	4/15/2020 Cocchia, Robert A.	Finalize opposition to motion to redact hearing and review and exchange emails regarding same.	\$780	1.4		\$1,092.00								
	4/15/2020 Cocchia, Robert A.	Telephone conference with Attorney Warren regarding pending discovery issues.	\$780	0.3		\$234.00								
	4/15/2020 Cocchia, Robert A.	Review and exchange emails regarding Sunrise's production of documents.	\$780	0.6		\$468.00								
	4/15/2020 Cocchia, Robert A.	Prepare for and participate in telephone conference with Discovery Engineer regarding analysis of Sunrise's ESI production and issues regarding same.	\$780	1		\$780.00								
	4/15/2020 Cocchia, Robert A.	Review of Sunrise production regarding disclosure of staffing and task time studies to support meet and confer response.	\$780	2.2		\$1,716.00								
	4/15/2020 Healey, Christopher J.	Review assessment documents.	\$870	0.5		\$435.00								
	4/15/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding to-do items.	\$870	0.2		\$174.00								
	4/15/2020 Healey, Christopher J.	Prepare correspondence to Tracy Myrick regarding Ann Lacey.	\$870	0.1		\$87.00								
	4/15/2020 Healey, Christopher J.	Revise opposition to redaction request.	\$870	0.5		\$435.00								
	4/15/2020 Healey, Christopher J.	Outline arguments regarding Sunrise assessment statement.	\$870	0.6		\$522.00								
	4/15/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$870	0.1		\$87.00								
	4/15/2020 Healey, Christopher J.	Revise ESI meet and confer letter.	\$870	0.8		\$696.00								
	4/15/2020 Healey, Christopher J.	Prepare correspondence to Tracy Myrick regarding document review.	\$870	0.2		\$174.00								
	4/15/2020 Healey, Christopher J.	Review draft chart regarding residency agreement.	\$870	0.1		\$87.00								
	4/15/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$870	0.2		\$174.00								
	4/15/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding database issues.	\$870	0.1		\$87.00								
	4/15/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding data production issues.	\$870	0.1		\$87.00								
	4/15/2020 Healey, Christopher J.	Review final injunction and prepare correspondence to Attorney Thamer regarding same.	\$870	0.2		\$174.00								
	4/15/2020 Healey, Christopher J.	Review Attorney Kawamoto's correspondence regarding settlement agreement and respond to same.	\$870	0.7		\$609.00								
	4/15/2020 Healey, Christopher J.	Follow-up correspondence regarding settlement agreement.	\$870	0.2		\$174.00								
	4/15/2020 Myrick, Tracy R.	Convert defendant SUN002 production metadata file and align fields in excel and provide to caseteam.	\$195	0.3		\$58.50								
	4/15/2020 Myrick, Tracy R.	Update deposition log.	\$195	0.2		\$39.00								
	4/15/2020 Sykes, Cheryl E.	Analyzed database for Sunrise policies and procedures documents regarding light duty for attorney review in preparation for case plan.	\$195	2.5		\$487.50								
	4/16/2020 Cocchia, Robert A.	Draft and finalize correspondence to opposing counsel regarding ESI production by Sunrise and review and exchange emails with Attorney Healey regarding same.	\$780	2.5		\$1,950.00								
	4/16/2020 Cocchia, Robert A.	Draft and finalize correspondence to opposing counsel regarding assessment data and research regarding same.	\$780	1.5		\$1,170.00								
	4/16/2020 Cocchia, Robert A.	Telephone conference with Attorney Healey regarding class certification and discovery issues.	\$780	0.3		\$234.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>		
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>
	4/16/2020 Cocchia, Robert A.	Review and exchange multiple emails with team regarding data analysis issues and meet and confer issues with Sunrise.	\$780	1		\$780.00							
	4/16/2020 Cocchia, Robert A.	Analysis of DSS citation information and emails regarding same.	\$780	0.4		\$312.00							
	4/16/2020 Cocchia, Robert A.	Review Court's order regarding redaction of hearing transcripts.	\$780	0.1									
	4/16/2020 Healey, Christopher J.	Prepare correspondence regarding ESI protocol issues.	\$870	0.1		\$87.00							
	4/16/2020 Healey, Christopher J.	Correspondence regarding plaintiffs' privilege log.	\$870	0.1		\$87.00							
	4/16/2020 Healey, Christopher J.	Review Attorney Marks revisions to discovery letters.	\$870	0.2		\$174.00							
	4/16/2020 Healey, Christopher J.	Review order denying defendant's motion to redact and prepare correspondence to team regarding same.	\$870	0.1		\$87.00							
	4/16/2020 Healey, Christopher J.	Review Attorney Marks' summary of target staffing hours.	\$870	0.1		\$87.00							
	4/16/2020 Healey, Christopher J.	Prepare correspondence regarding agenda for staffing call.	\$870	0.2		\$174.00							
	4/16/2020 Healey, Christopher J.	Telephone conference with Attorney Warren regarding complaint, marketing and other document issues.	\$870	0.6		\$522.00							
	4/16/2020 Healey, Christopher J.	Correspondence to Attorney Warren regarding e-Bulletin document review.	\$870	0.1		\$87.00							
	4/16/2020 Healey, Christopher J.	Correspondence with Attorney Cocchia regarding custom reports.	\$870	0.1		\$87.00							
	4/16/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00							
	4/16/2020 Healey, Christopher J.	Review Attorney Marks' to-do list regarding document review.	\$870	0.3		\$261.00							
	4/16/2020 Healey, Christopher J.	Review summary of quarterly staffing data.	\$870	0.5		\$435.00							
	4/16/2020 Healey, Christopher J.	Review correspondence regarding assessment data issues.	\$870	0.1		\$87.00							
	4/16/2020 Healey, Christopher J.	Review and revise letter regarding ESI items.	\$870	0.1		\$87.00							
	4/16/2020 Healey, Christopher J.	Review and revise letter regarding punch detail records.	\$870	0.4		\$348.00							
	4/16/2020 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding same.	\$870	0.3		\$261.00							
	4/16/2020 Healey, Christopher J.	Review and comment on exhibit regarding residency agreement language.	\$870	0.5		\$435.00							
	4/16/2020 Healey, Christopher J.	Prepare correspondence to Attorney Warren regarding marketing statements.	\$870	0.2		\$174.00							
	4/16/2020 Healey, Christopher J.	Correspondence with Attorney Yarnell regarding DSS citations.	\$870	0.1		\$87.00							
	4/16/2020 Sykes, Cheryl E.	Continue to analyze database for Sunrise policies and procedures documents regarding light duty for attorney review in preparation for case plan.	\$195	2		\$390.00							
	4/17/2020 Cocchia, Robert A.	Participate in team conference call regarding strategy and class certification issues.	\$780	1.5		\$1,170.00							
	4/17/2020 Cocchia, Robert A.	Review analysis of assessment data from Attorney Marks.	\$780	0.4		\$312.00							
	4/17/2020 Cocchia, Robert A.	Analyze Sunrise's responses to request for production, set five.	\$780	0.2		\$156.00							
	4/17/2020 Healey, Christopher J.	Outline to-do list for class certification brief.	\$870	1		\$870.00							
	4/17/2020 Healey, Christopher J.	Review key documents.	\$870	0.2		\$174.00							
	4/17/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding background documents.	\$870	0.1		\$87.00							
	4/17/2020 Healey, Christopher J.	Outline inserts to class brief.	\$870	0.2		\$174.00							
	4/17/2020 Healey, Christopher J.	Review Attorney Marks correspondence regarding Sunrise staffing approach.	\$870	0.8		\$696.00							
	4/17/2020 Healey, Christopher J.	Telephone conference with team regarding Sunrise staffing issues.	\$870	1.7		\$1,479.00	0.7	609.00	1.7	1,479.00			
	4/17/2020 Healey, Christopher J.	Review memos regarding witness interviews.	\$870	0.2		\$174.00							
	4/17/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding Residency Agreement exhibit.	\$870	0.1		\$87.00							
	4/17/2020 Healey, Christopher J.	Review Residence Agreement exhibit.	\$870	0.1		\$87.00							

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/17/2020 Healey, Christopher J.	Prepare correspondence to Tracy Myrick regarding service level staffing.	\$870	0.1		\$87.00									
	4/17/2020 Healey, Christopher J.	prepare correspondence to Attorney Wallace regarding common flow argument.	\$870	0.7		\$609.00									
	4/17/2020 Healey, Christopher J.	Review documents regarding Sunrise Assessment.	\$870	0.6		\$522.00									
	4/17/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding budget assumption documents.	\$870	0.1		\$87.00									
	4/17/2020 Myrick, Tracy R.	Transfer various case materials to David Marks, James Thornton and Blake Peters via Accellion.	\$195	0.6		\$117.00									
	4/17/2020 Sykes, Cheryl E.	Complete analysis of database for Sunrise policies and procedures documents regarding light duty for attorney review in preparation for case plan.	\$195	2.2		\$429.00									
	4/18/2020 Healey, Christopher J.	Prepare correspondence to Torrey Partners regarding data conversions.	\$870	0.2		\$174.00									
	4/18/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00									
	4/18/2020 Healey, Christopher J.	Review assessment/service plans and prepare correspondence regarding sample review.	\$870	0.6		\$522.00									
	4/18/2020 Healey, Christopher J.	Review Attorney Marks' analysis and document review.	\$870	0.3		\$261.00									
	4/18/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks' team regarding key documents.	\$870	2		\$1,740.00									
	4/18/2020 Myrick, Tracy R.	Provide various case materials to M. Thamer via Accellion.	\$195	0.5		\$97.50									
	4/19/2020 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding staffing analysis issues.	\$870	0.5		\$435.00									
	4/19/2020 Healey, Christopher J.	Follow-up correspondence to Attorney Thamer regarding same and review Sunrise documents.	\$870	0.5		\$435.00									
	4/19/2020 Healey, Christopher J.	Review Sunrise budget documents.	\$870	2		\$1,740.00									
	4/19/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks' team regarding additional background.	\$870	0.3		\$261.00									
	4/19/2020 Healey, Christopher J.	Analysis regarding Sunrise staffing formula.	\$870	1		\$870.00									
	4/20/2020 Cocchia, Robert A.	Review and exchange case related emails with team regarding status of assessment and service plan data review.	\$780	0.5		\$390.00									
	4/20/2020 Cocchia, Robert A.	Review privilege logs exchange by both sides and review and exchange emails regarding same with team.	\$780	0.6		\$468.00									
	4/20/2020 Cocchia, Robert A.	Review draft meet and confer regarding payroll data.	\$780	0.6		\$468.00									
	4/20/2020 Cocchia, Robert A.	Continue drafting summary of meet and confer efforts.	\$780	1		\$780.00									
	4/20/2020 Healey, Christopher J.	Outline questions for Rule 30(b) deposition and review documents regarding same.	\$870	2.5		\$2,175.00									
	4/20/2020 Healey, Christopher J.	Correspondence regarding Ganz errata issue.	\$870	0.1		\$87.00									
	4/20/2020 Healey, Christopher J.	Correspondence regarding meet and confer letter regarding assessment/service plan data.	\$870	0.1		\$87.00									
	4/20/2020 Healey, Christopher J.	Review deposition exhibits and outline deposition questions.	\$870	2		\$1,740.00									
	4/20/2020 Healey, Christopher J.	Telephone conference with Lindsay Pettite regarding OCR document conversion.	\$870	0.2		\$174.00									
	4/20/2020 Healey, Christopher J.	Follow-up correspondence to Attorney Marks and Tracy Myrick regarding same.	\$870	0.2		\$174.00									
	4/20/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding potential interview.	\$870	0.2		\$174.00									
	4/20/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Flores declaration and related issues.	\$870	0.2		\$174.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/20/2020 Healey, Christopher J.	Correspondence regarding same.	\$870	0.2		\$174.00									
	4/20/2020 Healey, Christopher J.	Prepare correspondence regarding DSS citations/complaints.	\$870	0.1		\$87.00									
	4/20/2020 Healey, Christopher J.	Review and respond regarding Attorney Warren list of complaints.	\$870	0.1		\$87.00									
	4/20/2020 Myrick, Tracy R.	Transfer case materials to L. Pettite via Accellion.	\$195	0.2		\$39.00									
	4/21/2020 Cocchia, Robert A.	Review and exchange emails with team regarding discovery issues.	\$780	0.5		\$390.00									
	4/21/2020 Cocchia, Robert A.	Review and exchange emails with opposing counsel regarding same.	\$780	0.3		\$234.00									
	4/21/2020 Cocchia, Robert A.	Analysis of assessment and service plan data issues.	\$780	0.6		\$468.00									
	4/21/2020 Healey, Christopher J.	Prepare for April 30 deposition.	\$870	0.9		\$783.00									
	4/21/2020 Healey, Christopher J.	Prepare correspondence regarding deposition to-do issues.	\$870	0.2		\$174.00									
	4/21/2020 Healey, Christopher J.	Correspondence regarding unique ID numbers on assessment/service plan information.	\$870	0.2		\$174.00									
	4/21/2020 Healey, Christopher J.	Review deposition exhibits and prepare for deposition.	\$870	1.4		\$1,218.00									
	4/21/2020 Healey, Christopher J.	Review Attorney Gorman's letter regarding Ganz testimony.	\$870	0.5		\$435.00									
	4/21/2020 Healey, Christopher J.	Research cases cited regarding deposition errata.	\$870	1		\$870.00									
	4/21/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding proposed approach regarding Ganz errata.	\$870	0.6		\$522.00									
	4/21/2020 Healey, Christopher J.	Prepare correspondence to team regarding potential additional plaintiffs.	\$870	0.3		\$261.00									
	4/21/2020 Healey, Christopher J.	Correspondence with Attorney Cocchia regarding meet and confer issues.	\$870	0.1		\$87.00									
	4/21/2020 Myrick, Tracy R.	Prepare treesize report of exhibits pull for 4/30/2020 and provide to caseteam.	\$195	0.2		\$39.00									
	4/21/2020 Myrick, Tracy R.	Upload defendant and plaintiff Privilege logs to shared drive and provide caseteam link to location.	\$195	0.2		\$39.00									
	4/22/2020 Cocchia, Robert A.	Draft omnibus declaration regarding discovery process and meet and confer history.	\$780	4.5		\$3,510.00									
	4/22/2020 Cocchia, Robert A.	Review and exchange multiple emails with team regarding discovery, class certification and 30(b)(6) deposition.	\$780	1.4		\$1,092.00									
	4/22/2020 Cocchia, Robert A.	Telephone call to attorney for potential witness (former employee).	\$780	0.3		\$234.00									
	4/22/2020 Cocchia, Robert A.	Review file regarding potential witnesses.	\$780	0.5		\$390.00									
	4/22/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding former plaintiff testimony.	\$870	0.1		\$87.00									
	4/22/2020 Healey, Christopher J.	Draft deposition outline for Rule 30(b)(6) deposition and review key documents.	\$870	4.4		\$3,828.00									
	4/22/2020 Healey, Christopher J.	Prepare correspondence to Tracy Myrick regarding deposition exhibits.	\$870	0.3		\$261.00									
	4/22/2020 Healey, Christopher J.	Prepare correspondence to team regarding questions on task studies.	\$870	0.2		\$174.00									
	4/22/2020 Healey, Christopher J.	Prepare correspondence to staff regarding deposition exhibits.	\$870	0.1		\$87.00									
	4/22/2020 Healey, Christopher J.	Review Attorney Marks' email regarding Flores time studies.	\$870	0.2		\$174.00									
	4/22/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.2		\$174.00									
	4/22/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding time study information.	\$870	0.2		\$174.00									
	4/22/2020 Healey, Christopher J.	Further deposition preparation.	\$870	1		\$870.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>					
				<u>Worked</u>		<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>	<u>Fees</u>		
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	4/22/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Flores declaration.	\$870	0.3			\$261.00						
	4/22/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding key documents.	\$870	0.2			\$174.00						
	4/22/2020 Myrick, Tracy R.	Export and organize additional exhibits for upcoming deposition.	\$195	1.3			\$253.50						
	4/22/2020 Myrick, Tracy R.	Download Ganz and Fearn deposition exhibits from TSG Court Reporting repository and provide caseteam with link to location.	\$195	0.5			\$97.50						
	4/22/2020 Myrick, Tracy R.	Provide deposition exhibits to G. Wallace via Accellion.	\$195	0.2			\$39.00						
	4/23/2020 Cocchia, Robert A.	Analyze Sunrise's task time data and deficiencies with same and outline strategy to obtain additional information from Sunrise.	\$780	0.6			\$468.00						
	4/23/2020 Cocchia, Robert A.	Prepare for and participate in team strategy conference call.	\$780	1.2			\$936.00						
	4/23/2020 Cocchia, Robert A.	Review and exchange emails regarding discovery issues with team.	\$780	1.1			\$858.00						
	4/23/2020 Cocchia, Robert A.	Continue drafting meet and confer declaration regarding discovery history.	\$780	1.5			\$1,170.00						
	4/23/2020 Healey, Christopher J.	Revise deposition outline.	\$870	0.6			\$522.00						
	4/23/2020 Healey, Christopher J.	Review task time data.	\$870	0.3			\$261.00						
	4/23/2020 Healey, Christopher J.	Prepare correspondence regarding team call on class motion.	\$870	0.1			\$87.00						
	4/23/2020 Healey, Christopher J.	Review correspondence regarding class certification brief and DSS citations.	\$870	0.2			\$174.00						
	4/23/2020 Healey, Christopher J.	Prepare correspondence regarding Sunrise documents (4690).	\$870	0.1			\$87.00						
	4/23/2020 Healey, Christopher J.	Telephone conference regarding preparation of deposition exhibits.	\$870	0.2			\$174.00						
	4/23/2020 Healey, Christopher J.	Prepare for call regarding class brief.	\$870	0.2			\$174.00						
	4/23/2020 Healey, Christopher J.	Telephone conference with team regarding class motion.	\$870	0.7			\$609.00	0.7	609.00				
	4/23/2020 Healey, Christopher J.	Further drafting of Rule 30(b)(6) deposition outline.	\$870	0.5			\$435.00						
	4/23/2020 Healey, Christopher J.	Prepare correspondence to Pat Kennedy regarding deposition preparation.	\$870	0.2			\$174.00						
	4/23/2020 Healey, Christopher J.	Correspondence regarding discovery meet and confer issues.	\$870	0.2			\$174.00						
	4/23/2020 Healey, Christopher J.	Correspondence regarding deposition exhibits list and confidentiality designation.	\$870	0.2			\$174.00						
	4/23/2020 Healey, Christopher J.	Correspondence with Attorney Cocchia regarding discovery meet and confer.	\$870	0.2			\$174.00						
	4/23/2020 Healey, Christopher J.	Prepare correspondence regarding deposition logistics.	\$870	0.1			\$87.00						
	4/23/2020 Healey, Christopher J.	Correspondence with Attorney Warren regarding Gibson non-response to email regarding deposition logistics.	\$870	0.2			\$174.00						
	4/23/2020 Healey, Christopher J.	Review Attorney Marks' correspondence regarding North Carolina standards.	\$870	0.1			\$87.00						
	4/23/2020 Healey, Christopher J.	Further revisions to deposition outline.	\$870	0.7			\$609.00						
	4/23/2020 Healey, Christopher J.	Conference regarding deposition exhibits.	\$870	0.1			\$87.00						
	4/23/2020 Healey, Christopher J.	Correspondence regarding Fearn's meet and confer.	\$870	0.1			\$87.00						
	4/23/2020 Myrick, Tracy R.	Export and gather additional exhibits for upcoming deposition.	\$195	0.5			\$97.50						
	4/23/2020 Myrick, Tracy R.	Review deposition exhibits and potential exhibits to determine which ones contain confidential markings.	\$195	0.4			\$78.00						
	4/23/2020 Myrick, Tracy R.	Prepare spreadsheet regarding same in preparation of class cert filing.	\$195	0.9			\$175.50						

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
		Review and exchange multiple emails with team regarding discovery issues, meet and confer with plaintiffs' counsel and review of assessments produced.	\$780	1.5	\$1,170.00								
	4/24/2020 Cocchia, Robert A.												
	4/24/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding privilege log meet and confer.	\$870	0.1	\$87.00								
	4/24/2020 Healey, Christopher J.	Telephone conference with Attorney Warren regarding deposition preparation issues.	\$870	0.2	\$174.00								
	4/24/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding staffing analysis and data analysis.	\$870	0.7	\$609.00								
	4/24/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding Flores declaration.	\$870	0.3	\$261.00								
	4/24/2020 Healey, Christopher J.	Prepare correspondence to team regarding assessment data analysis.	\$870	0.3	\$261.00								
	4/24/2020 Healey, Christopher J.	Prepare for call with damages expert.	\$870	0.3	\$261.00								
	4/24/2020 Healey, Christopher J.	Review Pulaski history and cases citing.	\$870	0.8	\$696.00								
	4/24/2020 Healey, Christopher J.	Prepare correspondence to defense counsel regarding Rule 30(b) deposition.	\$870	0.8	\$696.00								
	4/24/2020 Healey, Christopher J.	Telephone conference with Pat Kennedy regarding damages analysis.	\$870	0.2	\$174.00								
	4/24/2020 Healey, Christopher J.	Follow-up correspondence regarding damages analysis issues.	\$870	0.2	\$174.00								
	4/24/2020 Healey, Christopher J.	Telephone conferences regarding assessment data progress.	\$870	0.2	\$174.00								
	4/24/2020 Healey, Christopher J.	Telephone conference with Tracy Myrick regarding OCR of assessment data.	\$870	0.2	\$174.00								
	4/24/2020 Healey, Christopher J.	Prepare correspondence to team regarding data extraction project.	\$870	0.2	\$174.00								
	4/24/2020 Healey, Christopher J.	Prepare for Rule 30(b) deposition.	\$870	0.2	\$174.00								
	4/24/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding assessment and staff services.	\$870	0.3	\$261.00								
	4/24/2020 Healey, Christopher J.	Correspondence regarding assessment project.	\$870	0.2	\$174.00								
	4/24/2020 Myrick, Tracy R.	Prepare email to office services containing instructions for printing exhibits for upcoming deposition.	\$195	0.3	\$58.50								
	4/24/2020 Myrick, Tracy R.	Various communication's regarding same.	\$195	0.2	\$39.00								
	4/25/2020 Healey, Christopher J.	Prepare correspondence regarding data collection project.	\$870	0.1	\$87.00								
	4/25/2020 Healey, Christopher J.	Draft deposition outline.	\$870	1.8	\$1,566.00								
	4/25/2020 Healey, Christopher J.	Prepare correspondence to Tracy Myrick and Attorney Warren regarding 365 day adjust staff document.	\$870	0.2	\$174.00								
	4/25/2020 Healey, Christopher J.	Prepare correspondence to Tracy Myrick regarding deposition exhibit list.	\$870	0.2	\$174.00								
	4/25/2020 Myrick, Tracy R.	Update production log.	\$195	0.3	\$58.50								
	4/25/2020 Myrick, Tracy R.	Organization of exhibits in preparation of upcoming deposition.	\$195	1.4	\$273.00								
	4/26/2020 Cocchia, Robert A.	Review file regarding meet and confer discussions on Sunrise complaint and draft email to Attorney Warren regarding same.	\$780	1.2	\$936.00								
	4/26/2020 Healey, Christopher J.	Correspondence with Tracy Myrick regarding deposition exhibits.	\$870	0.1	\$87.00								
	4/26/2020 Healey, Christopher J.	Correspondence with Attorney Warren regarding evidentiary foundation for Sunrise website statement.	\$870	0.1	\$87.00								
	4/26/2020 Healey, Christopher J.	Review research article regarding same.	\$870	0.1	\$87.00								
	4/26/2020 Healey, Christopher J.	Revise deposition outline.	\$870	0.3	\$261.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/27/2020 Cocchia, Robert A.	Review and exchange email regarding discovery issues with team.	\$780	0.6		\$468.00								
	4/27/2020 Cocchia, Robert A.	Review incoming correspondence and emails from opposing counsel regarding discovery issues.	\$780	0.4		\$312.00								
	4/27/2020 Healey, Christopher J.	Correspondence regarding data assessment project.	\$870	0.3		\$261.00								
	4/27/2020 Healey, Christopher J.	Correspondence regarding Rule 30(b)(6) deposition preparation.	\$870	0.2		\$174.00								
	4/27/2020 Healey, Christopher J.	Office conference regarding deposition preparation.	\$870	0.5		\$435.00								
	4/27/2020 Healey, Christopher J.	Prepare for Rule 30(b)(6) deposition.	\$870	0.7		\$609.00								
	4/27/2020 Healey, Christopher J.	Correspondence regarding update deposition exhibit list.	\$870	0.2		\$174.00								
	4/27/2020 Healey, Christopher J.	Follow-up correspondence regarding data assessment project.	\$870	0.2		\$174.00								
	4/27/2020 Healey, Christopher J.	Telephone conference with team regarding data assessment project.	\$870	0.5		\$435.00				0.5	435.00			
	4/27/2020 Healey, Christopher J.	Prepare correspondence to team regarding data confidentiality and time issues.	\$870	0.1		\$87.00								
	4/27/2020 Healey, Christopher J.	Review new deposition exhibits and revise deposition index.	\$870	1.2		\$1,044.00								
	4/27/2020 Myrick, Tracy R.	Attend Demo regarding San Mateo assessment data project.	\$195	0.5		\$97.50								
	4/27/2020 Myrick, Tracy R.	Export San Mateo Assessment data from Relativity.	\$195	0.8		\$156.00								
	4/27/2020 Myrick, Tracy R.	Conference call with J. Thornton regarding same.	\$195	0.2		\$39.00								
	4/27/2020 Myrick, Tracy R.	Provide various Denton's staff access to the San Mateo Assessment data on our shared drive.	\$195	0.3		\$58.50								
	4/27/2020 Myrick, Tracy R.	Transfer San Mateo Assessment data to various users via Accellion.	\$195	0.5		\$97.50								
	4/27/2020 Myrick, Tracy R.	Communication with B. Umpierre regarding issue with production in Relativity.	\$195	0.1		\$19.50								
	4/27/2020 Myrick, Tracy R.	Communication with TSG Reporting Service regarding link to upload deposition exhibits.	\$195	0.1		\$19.50								
	4/27/2020 Myrick, Tracy R.	Update spreadsheet and provide to office services showing exhibit numbers assigned to documents for upcoming deposition.	\$195	0.2		\$39.00								
	4/27/2020 Sykes, Cheryl E.	Analyze Sunrise data and enter pertinent information ion Sunrise Assessment Data spreadsheet for attorney review and case plan.	\$195	1.5		\$292.50								
	4/28/2020 Cocchia, Robert A.	Review discovery propounded by Sunrise, request for production of documents, Set 3.	\$780	0.1		\$78.00								
	4/28/2020 Cocchia, Robert A.	Review 4/27/20 correspondence from Sunrise regarding discovery meet and confer regarding plaintiffs' responses to written discovery regarding Attorney Marks.	\$780	0.3		\$234.00								
	4/28/2020 Cocchia, Robert A.	Review CM staffing analysis forwarded by Attorney Marks.	\$780	0.6		\$468.00								
	4/28/2020 Cocchia, Robert A.	Review and exchange emails regarding meet and confer with opposing counsel on discovery issues.	\$780	0.4		\$312.00								
	4/28/2020 Healey, Christopher J.	Review Gibson email regarding 30(b)(6) designee.	\$870	0.1		\$87.00								
	4/28/2020 Healey, Christopher J.	Prepare correspondence to team regarding Sunrise designee.	\$870	0.2		\$174.00								
	4/28/2020 Healey, Christopher J.	Review Gibson correspondence regarding discovery issues.	\$870	0.1		\$87.00								
	4/28/2020 Healey, Christopher J.	Research regarding Rule 30(b)(6) designee, Jeff Slichta.	\$870	0.2		\$174.00								
	4/28/2020 Healey, Christopher J.	Prepare correspondence regarding deposition exhibits.	\$870	0.1		\$87.00								
	4/28/2020 Healey, Christopher J.	Review Attorney Marks' correspondence regarding Sunrise Care Manager hours.	\$870	0.1		\$87.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/28/2020 Healey, Christopher J.	Correspondence regarding meet and confer with Gibson regarding assessment data.	\$870	0.1		\$87.00								
	4/28/2020 Healey, Christopher J.	Telephone conference with Attorney Warren regarding deposition exhibits and logistics.	\$870	0.1		\$87.00								
	4/28/2020 Healey, Christopher J.	Correspondence with Tracy Myrick regarding deposition exhibits. Review draft Flores declaration and correspondence regarding same.	\$870	0.1		\$87.00								
	4/28/2020 Healey, Christopher J.	Prepare for Rule 30(b)(6) deposition.	\$870	0.3		\$261.00								
	4/28/2020 Healey, Christopher J.	Review Attorney Warren's proposed questions.	\$870	0.5		\$435.00								
	4/28/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding questions on task time studies.	\$870	0.2		\$174.00								
	4/28/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding task time exhibits.	\$870	1.2		\$1,044.00								
	4/28/2020 Healey, Christopher J.	Review correspondence regarding Slichta background.	\$870	0.1		\$87.00								
	4/28/2020 Healey, Christopher J.	Further deposition preparation and correspondence to Tracy Myrick regarding exhibits.	\$870	0.1		\$87.00								
	4/28/2020 Healey, Christopher J.	Prepare Linkedin profile of deponent Jeff Slichta as an exhibit and provide to caseteam.	\$870	1.2		\$1,044.00								
	4/28/2020 Myrick, Tracy R.	Export additional documents for exhibits for upcoming deposition.	\$195	0.7		\$136.50								
	4/28/2020 Myrick, Tracy R.	Analyze Sunrise data and enter pertinent information ion Sunrise Assessment Data spreadsheet for attorney review and case plan.	\$195	0.7		\$136.50								
	4/28/2020 Sykes, Cheryl E.	Research public records, litigation, and background of Jeff Slichta, for C. Healey.	\$195	4		\$780.00								
	4/28/2020 Valero, Carmen A.	Review and exchange multiple emails with team regarding discovery status and meet and confer strategy.	\$360	1		\$360.00								
	4/29/2020 Cocchia, Robert A.	Review Sunrise's 4/29/20 document productions.	\$780	0.5		\$390.00								
	4/29/2020 Cocchia, Robert A.	Analyze 30(b)(6) documents forwarded by Attorney Healey.	\$780	0.8		\$624.00								
	4/29/2020 Cocchia, Robert A.	Research regarding scope of arbitration agreement to pre-contract representations.	\$780	0.3		\$234.00								
	4/29/2020 Cocchia, Robert A.	Telephone conference with Attorney Healey regarding Sunrise production of assessment information.	\$780	3.1		\$2,418.00	1.55	1,209.00						
	4/29/2020 Cocchia, Robert A.	Correspondence with Attorney Johnson regarding complaints.	\$780	0.2		\$156.00								
	4/29/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding task time questions.	\$870	0.1		\$87.00								
	4/29/2020 Healey, Christopher J.	Review potential additional exhibits.	\$870	0.7		\$609.00								
	4/29/2020 Healey, Christopher J.	Review and revise deposition exhibit list.	\$870	0.5		\$435.00								
	4/29/2020 Healey, Christopher J.	Correspondence regarding deposition preparation.	\$870	0.3		\$261.00								
	4/29/2020 Healey, Christopher J.	Correspondence with Attorney Thamer regarding deposition preparation.	\$870	0.2		\$174.00								
	4/29/2020 Healey, Christopher J.	Reminder correspondence to team regarding discovery meet and confer.	\$870	0.1		\$87.00								
	4/29/2020 Healey, Christopher J.	Revise deposition question outline.	\$870	1.8		\$1,566.00								
	4/29/2020 Healey, Christopher J.	Participate in mock video deposition session.	\$870	0.5		\$435.00								
	4/29/2020 Healey, Christopher J.	Prepare for Rule 30(b)(6) deposition and review deposition outline.	\$870	3		\$2,610.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
		Correspondence with Attorney Warren regarding deposition outline/objections.	\$870	0.2	\$174.00								
	4/29/2020 Healey, Christopher J.	Prepare list of deposition objections.	\$870	1	\$870.00								
	4/29/2020 Healey, Christopher J.	Review Sunrise document production.	\$870	0.5	\$435.00								
	4/29/2020 Healey, Christopher J.	Prepare correspondence to Tracy Myrick regarding deposition exhibits.	\$870	0.1	\$87.00								
	4/29/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding additional Residency Agreement.	\$870	0.1	\$87.00								
	4/29/2020 Myrick, Tracy R.	Export additional documents for exhibits for upcoming deposition.	\$195	1	\$195.00								
	4/29/2020 Myrick, Tracy R.	Review and organization of exhibits.	\$195	1	\$195.00								
	4/29/2020 Myrick, Tracy R.	Update spreadsheet showing list of exhibits.	\$195	1	\$195.00								
	4/29/2020 Myrick, Tracy R.	Provide new exhibits to office services to print.	\$195	0.3	\$58.50								
	4/29/2020 Myrick, Tracy R.	Demo with C. Healey and S. Warren on uploading/previewing/stamping exhibits.	\$195	0.5	\$97.50								
	4/29/2020 Myrick, Tracy R.	Work on uploading exhibits to TSG Reporting repository.	\$195	1.2	\$234.00								
	4/29/2020 Myrick, Tracy R.	Provide deposition exhibits to Gibson Dunn via Accellion in preparation of J. Slichta deposition.	\$195	0.5	\$97.50								
	4/29/2020 Myrick, Tracy R.	Download multiple defendant productions and provide caseteam with link to locations.	\$195	0.5	\$97.50								
	4/29/2020 Myrick, Tracy R.	Capture and transfer various information from San Mateo Assessment data to spreadsheet.	\$195	1.5	\$292.50								
	4/29/2020 Myrick, Tracy R.	Prepare search in relativity regarding San Mateo Assessment data and provide to caseteam.	\$195	0.3	\$58.50								
	4/29/2020 Sykes, Cheryl E.	Analyze Sunrise data and enter pertinent information ion Sunrise Assessment Data spreadsheet for attorney review and case plan.	\$195	4.3	\$838.50								
	4/30/2020 Cocchia, Robert A.	Review additional documents produced by Sunrise.	\$780	0.6	\$468.00								
	4/30/2020 Cocchia, Robert A.	Review and exchange emails regarding discovery disputes and status of meet and confer.	\$780	0.5	\$390.00								
	4/30/2020 Cocchia, Robert A.	Continue drafting discovery meet and confer and supporting documents including chronology.	\$780	1.6	\$1,248.00								
	4/30/2020 Healey, Christopher J.	Prepare for deposition.	\$870	1.4	\$1,218.00								
	4/30/2020 Healey, Christopher J.	Review new deposition exhibit.	\$870	0.1	\$87.00								
	4/30/2020 Healey, Christopher J.	Take deposition of Sunrise 30(b)(6) witness.	\$870	9.5	\$8,265.00								
	4/30/2020 Healey, Christopher J.	Status report to team regarding same.	\$870	0.1	\$87.00								
	4/30/2020 Healey, Christopher J.	Prepare correspondence regarding deposition exhibit (testimony summary).	\$870	0.1	\$87.00								
	4/30/2020 Myrick, Tracy R.	Remotely attend deposition of Jeff Slichta.	\$195	3.5	\$682.50								
	4/30/2020 Myrick, Tracy R.	Upload defendant production to shared drive and to TSG repository for deposition.	\$195	0.2	\$39.00								
	4/30/2020 Myrick, Tracy R.	Transfer various information from San Mateo Assessment data to spreadsheet.	\$195	1	\$195.00								
	4/30/2020 Myrick, Tracy R.	Review additional San Mateo assessment data to determine they are not duplicates.	\$195	1	\$195.00								
	4/30/2020 Sykes, Cheryl E.	Analyze Sunrise data and enter pertinent information ion Sunrise Assessment Data spreadsheet for attorney review and case plan.	\$195	4.5	\$877.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>	<u>Fees</u>	<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	5/1/2020 Cocchia, Robert A.	Review and exchange case related emails with team regarding discovery and motion for class certification.	\$780	0.6	\$468.00								
	5/1/2020 Cocchia, Robert A.	Review draft meet and confer letter regarding plaintiffs' responses to discovery.	\$780	0.4	\$312.00								
	5/1/2020 Cocchia, Robert A.	Brief review of rough deposition transcript of Sunrise 30(b)(6) witness.	\$780	0.8	\$624.00								
	5/1/2020 Healey, Christopher J.	Correspondence regarding data extraction project.	\$870	0.2	\$174.00								
	5/1/2020 Healey, Christopher J.	Correspondence regarding meet and confer.	\$870	0.1	\$87.00								
	5/1/2020 Healey, Christopher J.	Review update exhibit regarding Residency Agreement.	\$870	0.1	\$87.00								
	5/1/2020 Myrick, Tracy R.	Transfer various information from San Mateo Assessment data to spreadsheet and provide final spreadsheet to G. Vidmar.	\$195	1.6	\$312.00								
	5/1/2020 Myrick, Tracy R.	Download additional San Mateo Assessment data from Relativity.	\$195	1.5	\$292.50								
	5/1/2020 Myrick, Tracy R.	Prepare and send spreadsheet assigning new records to volunteers for San Mateo Assessment data project.	\$195	0.5	\$97.50								
	5/1/2020 Myrick, Tracy R.	Prepare zip files of additional San Mateo Assessment data and send to volunteers via Accellion.	\$195	0.7	\$136.50								
	5/1/2020 Sykes, Cheryl E.	Analyze Sunrise data and enter pertinent information ion Sunrise Assessment Data spreadsheet for attorney review and case plan.	\$195	4	\$780.00								
	5/4/2020 Cocchia, Robert A.	Prepare for discovery meet and confer conference and review documents produced by Sunrise to date regarding same.	\$780	2.5	\$1,950.00								
	5/4/2020 Cocchia, Robert A.	Review and exchange emails with team regarding strategy, class certification and discovery.	\$780	0.6	\$468.00								
	5/4/2020 Healey, Christopher J.	Correspondence with Kennedy's office regarding Slichta deposition.	\$870	0.1	\$87.00								
	5/4/2020 Healey, Christopher J.	Review Slichta transcript.	\$870	1.8	\$1,566.00								
	5/4/2020 Healey, Christopher J.	Research regarding "no policy" cases.	\$870	0.2	\$174.00								
	5/4/2020 Healey, Christopher J.	Respond to Attorney Marks' question regarding Sunrise documents.	\$870	0.2	\$174.00								
	5/4/2020 Healey, Christopher J.	Telephone conference with Attorneys Wallace and Johnson regarding Rule 30 deposition testimony and class motion.	\$870	0.6	\$522.00								
	5/4/2020 Healey, Christopher J.	Prepare correspondence regarding financial POA issue.	\$870	0.1	\$87.00								
	5/4/2020 Myrick, Tracy R.	Upload J. Slichta deposition transcript to shared drive and provide caseteam with link to location.	\$195	0.1	\$19.50								
	5/4/2020 Myrick, Tracy R.	Prepare zip file of all formats of J. Slichta transcript and provide to caseteam per C. Healey.	\$195	0.1	\$19.50								
	5/4/2020 Myrick, Tracy R.	Import Ganz and Fearn deposition transcripts into Casenotebook and work on linking exhibits.	\$195	1	\$195.00								
	5/4/2020 Sykes, Cheryl E.	Analyze Sunrise data and enter pertinent information ion Sunrise Assessment Data spreadsheet for attorney review and case plan.	\$195	4.2	\$819.00								
	5/5/2020 Cocchia, Robert A.	Review discovery and meet and confer correspondence in preparation for conference call with opposing counsel regarding ESI and assessment data.	\$780	3.3	\$2,574.00								
	5/5/2020 Cocchia, Robert A.	Telephone conference with Attorney Healey regarding same.	\$780	0.2	\$156.00								
	5/5/2020 Cocchia, Robert A.	Participate in meet and confer conference call with opposing counsel regarding ESI and assessment date.	\$780	1.6	\$1,248.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	5/5/2020 Cocchia, Robert A.	Review correspondence from opposing counsel regarding meet and confer conference.	\$780	0.2		\$156.00									
	5/5/2020 Healey, Christopher J.	Review Attorney Wallace's email regarding "no policy" policy cases.	\$870	0.2		\$174.00									
	5/5/2020 Healey, Christopher J.	Correspondence with Attorney Cocchia regarding discovery meet and confer.	\$870	0.1		\$87.00									
	5/5/2020 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding document review.	\$870	0.1		\$87.00									
	5/5/2020 Healey, Christopher J.	Revise correspondence regarding expert issues.	\$870	0.1		\$87.00									
	5/5/2020 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding discovery meet and confer.	\$870	0.2		\$174.00									
	5/5/2020 Healey, Christopher J.	Review draft Flores declaration.	\$870	0.2		\$174.00									
	5/5/2020 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding background information.	\$870	0.1		\$87.00									
	5/5/2020 Healey, Christopher J.	Draft Healey declaration in support of class motion.	\$870	5.3		\$4,611.00		2	1,740.00						
	5/5/2020 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding Sunrise assessment documents.	\$870	0.3		\$261.00									
	5/5/2020 Healey, Christopher J.	Correspondence regarding operations manual.	\$870	0.3		\$261.00									
	5/5/2020 Healey, Christopher J.	Correspondence regarding Sunrise reproduction of searchable PDFs.	\$870	0.2		\$174.00									
	5/5/2020 Healey, Christopher J.	Review cases regarding "no policy" policy.	\$870	0.9		\$783.00									
	5/5/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$870	0.1		\$87.00									
	5/5/2020 Healey, Christopher J.	Review summaries of Executive Director deposition testimony.	\$870	0.2		\$174.00									
	5/5/2020 Healey, Christopher J.	Prepare correspondence regarding draft Flores declaration.	\$870	0.2		\$174.00									
	5/5/2020 Healey, Christopher J.	Prepare correspondence regarding AL/Rem decision.	\$870	0.1		\$87.00									
	5/5/2020 Healey, Christopher J.	Review documents regarding supporting Healey declaration.	\$870	0.3		\$261.00									
	5/5/2020 Myrick, Tracy R.	Download multiple defendant productions and provide caseteam with link to locations.	\$195	0.8		\$156.00									
	5/5/2020 Myrick, Tracy R.	Update production log regarding same.	\$195	0.2		\$39.00									
	5/5/2020 Sykes, Cheryl E.	Analyze Sunrise data and enter pertinent information on Sunrise Assessment Data spreadsheet for attorney review and case plan.	\$195	4.6		\$897.00									
	5/5/2020 Valero, Carmen A.	Research CACD cases re "no-policy policy" approach, for C. Healey.	\$360	1		\$360.00									
	5/6/2020 Cocchia, Robert A.	Review and exchange emails with team regarding discovery issues.	\$780	0.4		\$312.00									
	5/6/2020 Cocchia, Robert A.	Analysis of notes from discovery meet and confer and follow up regarding same.	\$780	0.5		\$390.00									
	5/6/2020 Cocchia, Robert A.	Review spreadsheet regarding service levels forwarded by Attorney Healey and review notes regarding production of similar documents by Sunrise.	\$780	0.7		\$546.00									
	5/6/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding Flores declaration.	\$870	0.2		\$174.00									
	5/6/2020 Healey, Christopher J.	Prepare correspondence regarding DSS citations.	\$870	0.1		\$87.00									
	5/6/2020 Healey, Christopher J.	Further drafting of Healey declaration in support of Class Motion.	\$870	8.3		\$7,221.00		3	2,610.00						
	5/6/2020 Healey, Christopher J.	Review Attorney Maryott letter regarding deposition exhibits.	\$870	0.1		\$87.00									
	5/6/2020 Healey, Christopher J.	Review and analyze DLL extract data.	\$870	0.3		\$261.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	5/6/2020 Myrick, Tracy R.	Transfer various information from San Mateo Assessment data to spreadsheet.	\$195	2.5									
	5/6/2020 Sykes, Cheryl E.	Analyze Sunrise data and enter pertinent information ion Sunrise Assessment Data spreadsheet for attorney review and case plan.	\$195	2.8									
	5/7/2020 Cocchia, Robert A.	Review and exchange emails with team regarding discovery and class certification issues.	\$780	0.5									
	5/7/2020 Cocchia, Robert A.	Analyze data from assessment and service plan reports.	\$780	0.4									
	5/7/2020 Cocchia, Robert A.	Continue drafting chronology of meet and confer efforts regarding Sunrise's document productions.	\$780	1.1									
	5/7/2020 Healey, Christopher J.	Review Attorney Warren's correspondence regarding corrected exhibits and response regarding same.	\$870	0.2									
	5/7/2020 Healey, Christopher J.	Review Attorney Umpierre's correspondence regarding confidential designation.	\$870	0.1									
	5/7/2020 Healey, Christopher J.	Telephone conference with Attorney Warren regarding discovery issues.	\$870	0.2									
	5/7/2020 Healey, Christopher J.	Draft supporting declaration regarding class certification motion.	\$870	4									
	5/7/2020 Healey, Christopher J.	Correspondence with team regarding expert costs.	\$870	0.1									
	5/7/2020 Healey, Christopher J.	Telephone conference with team regarding Flores declaration and understaffing analysis.	\$870	1					1	870.00			
	5/7/2020 Healey, Christopher J.	Prepare correspondence to Flores regarding DSS citations.	\$870	0.2									
	5/7/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding class brief and supporting materials.	\$870	0.5									
	5/7/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding Flores and Schroyer declarations.	\$870	0.3									
	5/7/2020 Healey, Christopher J.	Prepare correspondence to Pat Kennedy's office regarding supporting declarations.	\$870	0.2									
	5/7/2020 Healey, Christopher J.	Draft supporting Healey declaration.	\$870	2.2									
	5/7/2020 Healey, Christopher J.	Prepare to-do list for class motion.	\$870	0.2									
	5/7/2020 Myrick, Tracy R.	Transfer various information from San Mateo Assessment data to spreadsheet.	\$195	1									
	5/7/2020 Sykes, Cheryl E.	Analyze Sunrise data and enter pertinent information ion Sunrise Assessment Data spreadsheet for attorney review and case plan.	\$195	4.5									
	5/8/2020 Cocchia, Robert A.	Review and exchange multiple emails regarding discovery issues, and draft motion for class certification.	\$780	1.5									
	5/8/2020 Cocchia, Robert A.	Review draft expert declarations regarding class certification and emails regarding same.	\$780	0.8									
	5/8/2020 Healey, Christopher J.	Respond to Attorney Marks' inquiry regarding Pacific Palisades.	\$870	0.2									
	5/8/2020 Healey, Christopher J.	Respond to Attorney Marks' inquiry regarding Terrance Club, Edna/Avon.	\$870	0.5									
	5/8/2020 Healey, Christopher J.	Correspondence regarding investigation interview.	\$870	0.1									
	5/8/2020 Healey, Christopher J.	Correspondence regarding telephone conference, Edna and Avon Place.	\$870	0.1									
	5/8/2020 Healey, Christopher J.	Prepare to-do list.	\$870	0.1									
	5/8/2020 Healey, Christopher J.	Correspondence regarding inserts to supporting declaration.	\$870	0.3									
	5/8/2020 Healey, Christopher J.	Draft supporting declaration.	\$870	1.7									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	5/8/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Attorney Marks' outline of Flores declaration.	\$870	0.2		\$174.00									
	5/8/2020 Healey, Christopher J.	Review draft outline and comment regarding same.	\$870	0.5		\$435.00									
	5/8/2020 Healey, Christopher J.	Prepare correspondence to Attorney Johnson regarding Flores analysis.	\$870	0.3		\$261.00									
	5/8/2020 Healey, Christopher J.	Telephone conference with Attorney Warren regarding deposition exhibits.	\$870	0.1		\$87.00									
	5/8/2020 Healey, Christopher J.	Revise correspondence regarding deposition corrections.	\$870	0.1		\$87.00									
	5/8/2020 Healey, Christopher J.	Telephone conference with Pat Kennedy regarding damage declaration.	\$870	0.7		\$609.00									
	5/8/2020 Healey, Christopher J.	Review correspondence regarding data extraction project.	\$870	0.1		\$87.00									
	5/8/2020 Healey, Christopher J.	Revise supporting declaration.	\$870	5.3		\$4,611.00									
	5/8/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding staffing analysis and related issues.	\$870	0.5		\$435.00									
	5/8/2020 Sykes, Cheryl E.	Analyze Sunrise data and enter pertinent information ion Sunrise Assessment Data spreadsheet for attorney review and case plan.	\$195	4.7		\$916.50									
	5/9/2020 Healey, Christopher J.	Revise supporting declaration.	\$870	4.4		\$3,828.00									
	5/9/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.4		\$348.00									
	5/9/2020 Healey, Christopher J.	Outline to-do items for class motion.	\$870	0.5		\$435.00									
	5/9/2020 Healey, Christopher J.	Review and revise Attorney Wallace's insert regarding staffing flaws.	\$870	0.5		\$435.00									
	5/9/2020 Healey, Christopher J.	Prepare correspondence regarding med management fees as part of damage analysis.	\$870	0.1		\$87.00									
	5/9/2020 Myrick, Tracy R.	Review rough draft of C. Healey declaration for class motion and begin pulling referenced exhibits.	\$195	0.8		\$156.00									
	5/9/2020 Myrick, Tracy R.	Transfer case materials to D. Marks, and B. Peters via Accellion.	\$195	0.5		\$97.50									
	5/10/2020 Healey, Christopher J.	Revise class certification motion.	\$870	7.2		\$6,264.00									
	5/10/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding witness interview.	\$870	0.1		\$87.00									
	5/10/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding to-do issues.	\$870	0.2		\$174.00									
	5/10/2020 Healey, Christopher J.	Prepare correspondence to team regarding former Sunrise employee.	\$870	0.2		\$174.00									
	5/11/2020 Cocchia, Robert A.	Prepare for and attend meet and confer conference call with opposing counsel regarding Plaintiffs' responses to discovery and Sunrise's failure to produce ESI or usable assessment data.	\$780	1.5		\$1,170.00									
	5/11/2020 Cocchia, Robert A.	Telephone conference with Attorney Umpierre regarding follow up on discovery issues.	\$780	0.3		\$234.00									
	5/11/2020 Cocchia, Robert A.	Review and exchange emails regarding discovery issues and update discovery chronology regarding same.	\$780	1.4		\$1,092.00									
	5/11/2020 Cocchia, Robert A.	Review and exchange emails regarding class certification issues.	\$780	0.5		\$390.00									
	5/11/2020 Cocchia, Robert A.	Review document production from Sunrise regarding billing history and census records.	\$780	1.2		\$936.00									
	5/11/2020 Healey, Christopher J.	Revise class certification motion.	\$870	3.2		\$2,784.00									
	5/11/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding meet and confer discovery issues.	\$870	0.2		\$174.00									
	5/11/2020 Healey, Christopher J.	Correspondence with supporting exhibits.	\$870	0.3		\$261.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	5/11/2020 Healey, Christopher J.	Review and comment on Attorney Umpierre's letter regarding exhibit issue.	\$870	0.3		\$261.00									
	5/11/2020 Healey, Christopher J.	Follow-up correspondence regarding confidentiality issue.	\$870	0.1		\$87.00									
	5/11/2020 Healey, Christopher J.	Further revisions to class brief.	\$870	2.3		\$2,001.00									
	5/11/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Flores analysis.	\$870	0.5		\$435.00									
	5/11/2020 Healey, Christopher J.	Prepare correspondence to Tracy Myrick regarding documents needed.	\$870	0.2		\$174.00									
	5/11/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding Pane Services issue.	\$870	0.2		\$174.00									
	5/11/2020 Myrick, Tracy R.	Continue to work on pulling exhibits referenced in C. Healey declaration.	\$195	4		\$780.00									
	5/11/2020 Myrick, Tracy R.	Transfer case materials to D. Marks, J. Thornton and D. Ashler via Accellion.	\$195	0.8		\$156.00									
	5/11/2020 Myrick, Tracy R.	Download DSS Citations and provide caseteam link to location.	\$195	0.3		\$58.50									
	5/11/2020 Myrick, Tracy R.	Download J. Slichta deposition video and provide caseteam with link to location.	\$195	0.3		\$58.50									
	5/12/2020 Jimenez, Yvette M.	Review and analyze motion for class certification.	\$380	2		\$760.00		2		760					
	5/12/2020 Jimenez, Yvette M.	Cite check legal cites in brief for accuracy.	\$380	4		\$1,520.00		4		1520					
	5/12/2020 Cocchia, Robert A.	Review and exchange case related email with team regarding discovery and class certification issues.	\$780	0.7		\$546.00									
	5/12/2020 Cocchia, Robert A.	Review 30(b)(6) deposition transcript regarding assessment data as it relates to pending discovery issues.	\$780	0.8		\$624.00									
	5/12/2020 Healey, Christopher J.	Prepare correspondence to team regarding document exhibits.	\$870	0.2		\$174.00									
	5/12/2020 Healey, Christopher J.	Outline analysis regarding Flores declaration.	\$870	0.4		\$348.00									
	5/12/2020 Healey, Christopher J.	Review Flores declaration in Aegis.	\$870	0.1		\$87.00									
	5/12/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$870	0.2		\$174.00									
	5/12/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding brief and supporting materials.	\$870	0.3		\$261.00									
	5/12/2020 Healey, Christopher J.	Telephone conferences with Attorney Warren regarding deposition exhibit and related issues.	\$870	0.3		\$261.00									
	5/12/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding Flores declaration language.	\$870	0.3		\$261.00									
	5/12/2020 Healey, Christopher J.	Review correspondence regarding deposition exhibits.	\$870	0.1		\$87.00									
	5/12/2020 Healey, Christopher J.	Correspondence regarding draft Ganz declaration.	\$870	0.2		\$174.00									
	5/12/2020 Healey, Christopher J.	Correspondence regarding protective order and Aegis/Oakmont documents.	\$870	0.3		\$261.00									
	5/12/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding case status.	\$870	0.1		\$87.00									
	5/12/2020 Healey, Christopher J.	Review and comment regarding document index.	\$870	0.2		\$174.00									
	5/12/2020 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding Base Services issue.	\$870	0.2		\$174.00									
	5/12/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.2		\$174.00									
	5/12/2020 Healey, Christopher J.	Revise class brief.	\$870	0.1		\$87.00									
	5/12/2020 Healey, Christopher J.	Review exhibits.	\$870	0.1		\$87.00									
	5/12/2020 Healey, Christopher J.	Prepare correspondence regarding deposition summaries.	\$870	0.1		\$87.00									
	5/12/2020 Healey, Christopher J.	Review motion exhibit list, correspondence regarding same.	\$870	0.2		\$174.00									
	5/12/2020 Healey, Christopher J.	Summarize Slichta deposition.	\$870	1		\$870.00									

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	5/12/2020 Myrick, Tracy R.	Continue to work on pulling exhibits referenced in C. Healey declaration.	\$195	3	\$585.00								
	5/12/2020 Myrick, Tracy R.	Continue to work on pulling/finalizing exhibits referenced in C. Healey declaration.	\$195	0.6	\$117.00								
	5/12/2020 Myrick, Tracy R.	Work on highlighting cited testimony in various deposition transcripts.	\$195	0.4	\$78.00								
	5/13/2020 Jimenez, Yvette M.	Review and analyze motion for class certification.	\$380	5.5	\$2,090.00	5.5	2090						
	5/13/2020 Jimenez, Yvette M.	Cite check legal cites in brief for accuracy.	\$380	0.5	\$190.00	0.5	190						
	5/13/2020 Cocchia, Robert A.	Review and exchange multiple emails regarding class certification motion and exhibits for same.	\$780	0.9	\$702.00								
	5/13/2020 Cocchia, Robert A.	Review and confirm production dates of assessment and census information.	\$780	0.3	\$234.00								
	5/13/2020 Healey, Christopher J.	Review Attorney Wallace's comments to Healey declaration.	\$870	0.2	\$174.00								
	5/13/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding Slichta deposition transcript.	\$870	0.1	\$87.00								
	5/13/2020 Healey, Christopher J.	Revise supporting declaration.	\$870	4.8	\$4,176.00	2	1,740.00						
	5/13/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding motion status.	\$870	0.1	\$87.00								
	5/13/2020 Healey, Christopher J.	Review and respond regarding letter on task time staff.	\$870	0.2	\$174.00								
	5/13/2020 Healey, Christopher J.	Review and comment on draft Fearn's declaration.	\$870	0.2	\$174.00								
	5/13/2020 Healey, Christopher J.	Correspondence regarding production dates.	\$870	0.1	\$87.00								
	5/13/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding same.	\$870	0.2	\$174.00								
	5/13/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding class definition.	\$870	0.2	\$174.00								
	5/13/2020 Healey, Christopher J.	Review and respond regarding confidential designation to exhibits.	\$870	0.1	\$87.00								
	5/13/2020 Healey, Christopher J.	Review draft Kennedy declaration.	\$870	0.4	\$348.00								
	5/13/2020 Healey, Christopher J.	Revise class brief.	\$870	1.8	\$1,566.00								
	5/13/2020 Healey, Christopher J.	Review and respond to Attorney Marks regarding Flores declaration.	\$870	0.5	\$435.00								
	5/13/2020 Healey, Christopher J.	Correspondence with Pat Kennedy's office regarding declaration.	\$870	0.1	\$87.00								
	5/13/2020 Healey, Christopher J.	Review autocite changes.	\$870	0.5	\$435.00								
	5/13/2020 Myrick, Tracy R.	Transfer Slichta deposition exhibits to D. Marks, D. Asher and B. Umpierre via Accellion.	\$195	0.5	\$97.50								
	5/13/2020 Myrick, Tracy R.	Download Slichta deposition exhibits and provide caesteam link to location.	\$195	0.3	\$58.50								
	5/13/2020 Myrick, Tracy R.	Various communication with TSG regarding same.	\$195	0.2	\$39.00								
	5/13/2020 Myrick, Tracy R.	Continue to work on pulling/finalizing exhibits for C. Healey Declaration for the class motion.	\$195	1	\$195.00								
	5/13/2020 Myrick, Tracy R.	Work on highlighting cited testimony in various deposition transcripts.	\$195	1	\$195.00								
	5/14/2020 Cocchia, Robert A.	Review and exchange case related email regarding discovery and class certification.	\$780	0.5	\$390.00								
	5/14/2020 Healey, Christopher J.	Review and respond to Attorney Marks' question regarding continence scores.	\$870	0.3	\$261.00								
	5/14/2020 Healey, Christopher J.	Review and respond to guidelines regarding Flores exhibits.	\$870	0.2	\$174.00								
	5/14/2020 Healey, Christopher J.	Prepare correspondence to Schroyer declaration.	\$870	0.2	\$174.00								
	5/14/2020 Healey, Christopher J.	Correspondence regarding deposition exhibit index.	\$870	0.3	\$261.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
	5/14/2020 Healey, Christopher J.	Correspondence regarding declaration exhibits.	\$870	0.2							
	5/14/2020 Healey, Christopher J.	Review Yarnell report regarding DSS file review.	\$870	0.3	\$174.00						
	5/14/2020 Healey, Christopher J.	Telephone conference with Attorney Yarnell regarding DSS complaint and related issues.	\$870	0.3	\$261.00						
	5/14/2020 Healey, Christopher J.	Follow-up correspondence regarding DSS citations and related issues.	\$870	0.2	\$174.00						
	5/14/2020 Healey, Christopher J.	Prepare correspondence regarding team call.	\$870	0.1	\$87.00						
	5/14/2020 Healey, Christopher J.	Review Brief section re DSS citations/complaints.	\$870	0.2	\$174.00						
	5/14/2020 Healey, Christopher J.	Prepare correspondence to Attorney Yarnell regarding same.	\$870	0.1	\$87.00						
	5/14/2020 Healey, Christopher J.	Revise Kennedy declaration.	\$870	2.6	\$2,262.00						
	5/14/2020 Healey, Christopher J.	Correspondence with Kennedy's office regarding draft declaration.	\$870	0.1	\$87.00						
	5/14/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding class filing.	\$870	0.1	\$87.00						
	5/14/2020 Healey, Christopher J.	Prepare correspondence regarding move-in fee issue.	\$870	0.2	\$174.00						
	5/14/2020 Healey, Christopher J.	Correspondence regarding Zack declaration and move-in fee.	\$870	0.8	\$696.00						
	5/14/2020 Healey, Christopher J.	Revise Healey supporting declaration.	\$870	1.5	\$1,305.00	1	870.00				
	5/14/2020 Healey, Christopher J.	Revise class certification brief.	\$870	0.5	\$435.00						
	5/14/2020 Healey, Christopher J.	Correspondence with Gibson regarding Exhibit 29.	\$870	0.1	\$87.00						
	5/14/2020 Healey, Christopher J.	Telephone conference with Attorney Maryott regarding Exhibit 29.	\$870	0.3	\$261.00						
	5/14/2020 Healey, Christopher J.	Telephone conference with Attorney Warren regarding same.	\$870	0.2	\$174.00						
	5/14/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding Fearn's status and exhibits.	\$870	0.3	\$261.00						
	5/14/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding same.	\$870	0.2	\$174.00						
	5/14/2020 Healey, Christopher J.	Review and revise Flores declaration.	\$870	2.5	\$2,175.00	1	870.00				
	5/14/2020 Healey, Christopher J.	Review Attorney Wallace changes to same.	\$870	0.5	\$435.00						
	5/14/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding Flores declaration.	\$870	0.2	\$174.00						
	5/14/2020 Myrick, Tracy R.	Continue to work on pulling/finalizing exhibits for C. Healey declaration.	\$195	1	\$195.00						
	5/14/2020 Myrick, Tracy R.	Review C. Healey declaration and compare with exported exhibits.	\$195	1	\$195.00						
	5/14/2020 Myrick, Tracy R.	Prepare list of exhibits and send to caseteam.	\$195	1	\$195.00						
	5/14/2020 Myrick, Tracy R.	Send Sunrise Complaint docs to M. Yarnall via Accellion.	\$195	0.3	\$58.50						
	5/15/2020 Cocchia, Robert A.	Review multiple correspondence from opposing counsel regarding Plaintiffs' responses to discovery.	\$780	0.4	\$312.00						
	5/15/2020 Cocchia, Robert A.	Review draft declarations in support of motion for class certification.	\$780	1							
	5/15/2020 Healey, Christopher J.	Review Attorney Wallace's changes to class certification brief.	\$870	0.1	\$87.00						
	5/15/2020 Healey, Christopher J.	Prepare correspondence to team regarding class certification brief.	\$870	0.2	\$174.00						
	5/15/2020 Healey, Christopher J.	Review Attorney Johnson's changes to Flores declaration.	\$870	0.1	\$87.00						
	5/15/2020 Healey, Christopher J.	Prepare correspondence regarding Residency Agreement chart.	\$870	0.2	\$174.00						
	5/15/2020 Healey, Christopher J.	Prepare correspondence regarding Fearn's declaration.	\$870	0.1	\$87.00						
	5/15/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Flores declaration.	\$870	0.3	\$261.00						
	5/15/2020 Healey, Christopher J.	Draft proposed insert to Flores declaration regarding named claim issue.	\$870	0.7	\$609.00						

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	5/15/2020 Healey, Christopher J.	Response to Attorney Marks' questions regarding Flores declaration.	\$870	0.2	\$174.00								
	5/15/2020 Healey, Christopher J.	Correspondence regarding class motion and exhibits.	\$870	0.1	\$87.00								
	5/15/2020 Healey, Christopher J.	Revise declaration and exhibit list.	\$870	0.3	\$261.00								
	5/15/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding Fearn's issues.	\$870	0.1	\$87.00								
	5/15/2020 Healey, Christopher J.	Telephone conference with team regarding filing issues.	\$870	0.4	\$348.00								
	5/15/2020 Healey, Christopher J.	Revise materials regarding Fearn's declaration and prepare correspondence regarding same.	\$870	0.5	\$435.00								
	5/15/2020 Healey, Christopher J.	Revise Healey declaration.	\$870	0.4	\$348.00								
	5/15/2020 Healey, Christopher J.	Correspondence regarding exhibit list.	\$870	0.1	\$87.00								
	5/15/2020 Healey, Christopher J.	Review and revise Schroyer declaration.	\$870	0.1	\$87.00								
	5/15/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding same.	\$870	0.2	\$174.00								
	5/15/2020 Healey, Christopher J.	Correspondence regarding same.	\$870	0.1	\$87.00								
	5/15/2020 Healey, Christopher J.	Review class certification brief.	\$870	0.4	\$348.00								
	5/15/2020 Healey, Christopher J.	Correspondence with Schroyer regarding declaration.	\$870	0.2	\$174.00								
	5/15/2020 Healey, Christopher J.	Correspondence regarding outstanding declaration and filing issues.	\$870	0.2	\$174.00								
	5/15/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Fearn's declaration.	\$870	0.2	\$174.00								
	5/15/2020 Healey, Christopher J.	Conference call with team regarding filing issues.	\$870	0.5	\$435.00								
	5/15/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Flores declaration.	\$870	0.2	\$174.00								
	5/15/2020 Healey, Christopher J.	Review Kennedy declaration.	\$870	0.1	\$87.00								
	5/15/2020 Healey, Christopher J.	Review Residency Agreement exhibit and revise same.	\$870	0.3	\$261.00								
	5/15/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding redaction issue.	\$870	0.2	\$174.00								
	5/15/2020 Healey, Christopher J.	Review Gibson letter regarding privilege issues.	\$870	0.1	\$87.00								
	5/15/2020 Myrick, Tracy R.	Review exhibits to C. Healey declaration and compare with final exhibit index.	\$195	1	\$195.00								
	5/16/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding Kennedy declaration.	\$870	0.2	\$174.00								
	5/16/2020 Healey, Christopher J.	Prepare correspondence regarding Residency Agreement exhibits.	\$870	0.1	\$87.00								
	5/16/2020 Healey, Christopher J.	Telephone conference with Tracy Myrick regarding Resident Agreement exhibit.	\$870	0.2	\$174.00								
	5/16/2020 Healey, Christopher J.	Review draft Flores declaration and correspondence regarding same.	\$870	0.3	\$261.00								
	5/16/2020 Healey, Christopher J.	Revise Flores exhibit list.	\$870	0.7	\$609.00								
	5/16/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding same.	\$870	0.1	\$87.00								
	5/16/2020 Healey, Christopher J.	Prepare correspondence to Pat Kennedy regarding declaration.	\$870	0.1	\$87.00								
	5/16/2020 Healey, Christopher J.	Review and comment regarding draft Flores declaration.	\$870	1.1	\$957.00								
	5/16/2020 Healey, Christopher J.	Prepare correspondence to team regarding motion caption.	\$870	0.1	\$87.00								
	5/16/2020 Healey, Christopher J.	Review Attorney Wallace's comments regarding Flores declaration.	\$870	0.2	\$174.00								
	5/16/2020 Healey, Christopher J.	Prepare correspondence to Tracy Myrick regarding assessment data.	\$870	0.1	\$87.00								
	5/16/2020 Healey, Christopher J.	Prepare correspondence to Megan Yarnell regarding DSS section of brief.	\$870	0.1	\$87.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	5/16/2020 Healey, Christopher J.	Review correspondence regarding declaration and exhibits.	\$870	0.1		\$87.00									
	5/16/2020 Healey, Christopher J.	Review Attorney Johnson's comments to Flores declaration and correspondence regarding same.	\$870	0.3		\$261.00									
	5/16/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding Flores declaration.	\$870	0.2		\$174.00									
	5/16/2020 Healey, Christopher J.	Review Flores declaration regarding document/exhibit issue.	\$870	0.2		\$174.00									
	5/16/2020 Healey, Christopher J.	Revise class certification brief.	\$870	2.5		\$2,175.00									
	5/16/2020 Healey, Christopher J.	Prepare correspondence to team regarding other resident issue.	\$870	0.2		\$174.00									
	5/16/2020 Healey, Christopher J.	Review and revise Healey declaration.	\$870	1.2		\$1,044.00									
	5/16/2020 Healey, Christopher J.	Review and comment on Flores declaration.	\$870	0.6		\$522.00									
	5/16/2020 Healey, Christopher J.	Prepare correspondence regarding Flores exhibits.	\$870	0.1		\$87.00									
	5/16/2020 Healey, Christopher J.	Correspondence regarding Flores declaration.	\$870	0.1		\$87.00									
	5/16/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding revisions to class certification brief.	\$870	0.2		\$174.00									
	5/16/2020 Myrick, Tracy R.	Transfer various case materials to D. Marks, and D. Asher via Accellion.	\$195	0.5		\$97.50									
	5/16/2020 Myrick, Tracy R.	Work on finalizing exhibits to C. Healey Declaration to match assigned exhibit number and provide caseteam link to location.	\$195	1		\$195.00									
	5/16/2020 Myrick, Tracy R.	Download exhibits to M. Yarnall declaration to shared drive and provide caseteam link to location.	\$195	0.3		\$58.50									
	5/16/2020 Myrick, Tracy R.	Gather and finalize exhibits to Dr. Flores declaration and provide same via Accellion.	\$195	0.7		\$136.50									
	5/17/2020 Healey, Christopher J.	Revise class certification brief.	\$870	2		\$1,740.00									
	5/17/2020 Healey, Christopher J.	Review and comment on Wallace's declaration regarding class counsel.	\$870	0.2		\$174.00									
	5/17/2020 Healey, Christopher J.	Revise Kennedy declaration.	\$870	1.4		\$1,218.00									
	5/17/2020 Healey, Christopher J.	Prepare correspondence regarding Marks bio for class counsel.	\$870	0.1		\$87.00									
	5/17/2020 Healey, Christopher J.	Review exhibits.	\$870	0.2		\$174.00									
	5/17/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding flow section of brief.	\$870	0.2		\$174.00									
	5/17/2020 Healey, Christopher J.	Correspondence regarding Marks bio for insert to Wallace declaration.	\$870	0.3		\$261.00									
	5/17/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding flows analysis.	\$870	0.2		\$174.00									
	5/17/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding same.	\$870	0.2		\$174.00									
	5/17/2020 Healey, Christopher J.	Prepare correspondence regarding redaction issue.	\$870	0.1		\$87.00									
	5/17/2020 Healey, Christopher J.	Prepare correspondence to Kennedy's office regarding declaration.	\$870	0.1		\$87.00									
	5/17/2020 Healey, Christopher J.	Review Wallace insert regarding flow and respond regarding same.	\$870	0.2		\$174.00									
	5/17/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Key Provisions Chart.	\$870	0.1		\$87.00									
	5/17/2020 Healey, Christopher J.	Review updated brief.	\$870	0.1		\$87.00									
	5/17/2020 Healey, Christopher J.	Correspondence regarding filing issues.	\$870	0.1		\$87.00									
	5/17/2020 Healey, Christopher J.	Correspondence with Attorney Warren regarding claw back documents.	\$870	0.1		\$87.00									
	5/17/2020 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding Kennedy exhibits.	\$870	0.1		\$87.00									
	5/17/2020 Healey, Christopher J.	Prepare to-do list regarding motion.	\$870	0.1		\$87.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	5/17/2020 Myrick, Tracy R.	Transfer C. Healey declaration exhibits to B. Umpierre via Accellion.	\$195	0.3		\$58.50									
	5/17/2020 Myrick, Tracy R.	Paginate Key Provisions Chart and add to Class Action Exhibit Folder.	\$195	0.1		\$19.50									
	5/18/2020 Cocchia, Robert A.	Review and exchange emails with team regarding discovery status and strategy for motions to compel.	\$780	0.5		\$390.00									
	5/18/2020 Cocchia, Robert A.	Research application of Rule 30(a)(2)(A)(ii) to corporate designee depositions and draft email to Attorney Healey regarding same.	\$780	1.6		\$1,248.00									
	5/18/2020 Cocchia, Robert A.	Research scope of interrogatories under federal rules.	\$780	0.1		\$78.00									
	5/18/2020 Cocchia, Robert A.	Began drafting motion to compel production of data per Court's order of January 31, 2020.	\$780	1.8		\$1,404.00									
	5/18/2020 Healey, Christopher J.	Review and revise proposed class certification order.	\$870	1		\$870.00									
	5/18/2020 Healey, Christopher J.	Prepare correspondence to Attorney Johnson regarding same.	\$870	0.2		\$174.00									
	5/18/2020 Healey, Christopher J.	Revise Healey declaration.	\$870	0.1		\$87.00									
	5/18/2020 Healey, Christopher J.	Review and revise Wallace declaration.	\$870	0.1		\$87.00									
	5/18/2020 Healey, Christopher J.	Review Attorney Marks' revisions to flows insert.	\$870	0.1		\$87.00									
	5/18/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding same.	\$870	0.1		\$87.00									
	5/18/2020 Healey, Christopher J.	Revise insert.	\$870	0.1		\$87.00									
	5/18/2020 Healey, Christopher J.	Revise class brief.	\$870	0.3		\$261.00									
	5/18/2020 Healey, Christopher J.	Revise Healey declaration.	\$870	0.1		\$87.00									
	5/18/2020 Healey, Christopher J.	Correspondence regarding Healey exhibits.	\$870	0.1		\$87.00									
	5/18/2020 Healey, Christopher J.	Correspondence with Attorney Cocchia regarding open discovery issues, including assessment data.	\$870	0.4		\$348.00									
	5/18/2020 Healey, Christopher J.	Review Attorney Marks changes to Kennedy declaration.	\$870	0.1		\$87.00									
	5/18/2020 Healey, Christopher J.	Revise Kennedy declaration.	\$870	0.4		\$348.00									
	5/18/2020 Healey, Christopher J.	Follow-up correspondence regarding Kennedy declaration.	\$870	0.1		\$87.00									
	5/18/2020 Healey, Christopher J.	Revise class certification brief.	\$870	0.5		\$435.00									
	5/18/2020 Healey, Christopher J.	Revise intro to class certification brief.	\$870	0.6		\$522.00									
	5/18/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding same.	\$870	0.1		\$87.00									
	5/18/2020 Healey, Christopher J.	Correspondence regarding redaction issues.	\$870	0.1		\$87.00									
	5/18/2020 Healey, Christopher J.	Prepare correspondence to team regarding motion filing.	\$870	0.1		\$87.00									
	5/18/2020 Healey, Christopher J.	Prepare correspondence regarding Yarnall declaration.	\$870	0.1		\$87.00									
	5/18/2020 Healey, Christopher J.	Correspondence regarding motion filing.	\$870	0.3		\$261.00									
	5/18/2020 Healey, Christopher J.	Conference call with team regarding ECF filing issues.	\$870	0.2		\$174.00				0.2	174.00				
	5/18/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1		\$87.00									
	5/18/2020 Myrick, Tracy R.	Highlight additional testimony cited in C. Healey declaration.	\$195	0.3		\$58.50									
	5/18/2020 Myrick, Tracy R.	Export C. Healey cv from Dentons website and add to declaration exhibit folder.	\$195	0.1		\$19.50									
	5/19/2020 Cocchia, Robert A.	Telephone conference with Attorney Healey regarding further discovery requests to be drafted.	\$780	0.3		\$234.00									
	5/19/2020 Cocchia, Robert A.	Draft special interrogatories regarding assessment and service plan data.	\$780	1.8		\$1,404.00									
	5/19/2020 Cocchia, Robert A.	Review and exchange multiple emails with team and opposing counsel regarding discovery issue and class certification motion.	\$780	1		\$780.00									
	5/19/2020 Healey, Christopher J.	Review Gibson correspondence regarding service issues.	\$870	0.1		\$87.00									
	5/19/2020 Healey, Christopher J.	Review Attorney Cocchia's correspondence and cases regarding Rule 30(b)(6) depositions.	\$870	0.2		\$174.00									

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	5/19/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding discovery issues.	\$870	0.2	\$174.00								
	5/19/2020 Healey, Christopher J.	Revise letter regarding privilege assertion.	\$870	0.2	\$174.00								
	5/19/2020 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding discovery issues.	\$870	0.2	\$174.00								
	5/19/2020 Healey, Christopher J.	Prepare correspondence to team regarding data extraction issue and motion to compel.	\$870	0.3	\$261.00								
	5/19/2020 Healey, Christopher J.	Review Attorney Gorman's correspondence regarding class motion issues.	\$870	0.2	\$174.00								
	5/19/2020 Healey, Christopher J.	Correspondence with team regarding same.	\$870	0.2	\$174.00								
	5/19/2020 Healey, Christopher J.	Prepare correspondence regarding Aegis/Oakmont task times.	\$870	0.1	\$87.00								
	5/19/2020 Healey, Christopher J.	Revise meet and confer correspondence regarding ESI and data issues.	\$870	0.2	\$174.00								
	5/19/2020 Healey, Christopher J.	Review Attorney Gorman's email regarding incorrect font size.	\$870	0.2	\$174.00								
	5/19/2020 Healey, Christopher J.	Revise class certification brief.	\$870	2.5	\$2,175.00								
	5/19/2020 Healey, Christopher J.	Correspondence regarding expert costs.	\$870	0.1	\$87.00								
	5/19/2020 Myrick, Tracy R.	Download revised video to Slichta deposition, and provide caseteam link to location.	\$195	0.3	\$58.50								
	5/19/2020 Myrick, Tracy R.	Removed SUN0004196-0004202 and SUN0004222-0004229 from shared drive in response to clawback request from defendant.	\$195	0.5	\$97.50								
	5/19/2020 Myrick, Tracy R.	Import Slichta deposition transcript into CaseNotebook and link exhibits and video to transcript.	\$195	1	\$195.00								
	5/20/2020 Healey, Christopher J.	Office conference regarding amended filing on class brief.	\$870	0.1	\$87.00								
	5/20/2020 Healey, Christopher J.	Prepare correspondence regarding Attorney Gorman's requests for expert discovery.	\$870	0.1	\$87.00								
	5/20/2020 Healey, Christopher J.	Review and revise amended class certification brief.	\$870	0.1	\$87.00								
	5/20/2020 Healey, Christopher J.	Review research regarding second Rule 30(b)(6) deposition.	\$870	0.1	\$87.00								
	5/20/2020 Healey, Christopher J.	Review Aegis' refusal to allow production of task time studies to Sunrise.	\$870	0.1	\$87.00								
	5/20/2020 Healey, Christopher J.	Prepare correspondence to team regarding Aegis/Oakmont time study information.	\$870	0.6	\$522.00								
	5/20/2020 Healey, Christopher J.	Follow-up correspondence with Attorney Umpierre regarding same.	\$870	0.1	\$87.00								
	5/20/2020 Healey, Christopher J.	Review Attorney Gorman's letter regarding filing issues.	\$870	0.1	\$87.00								
	5/20/2020 Healey, Christopher J.	Correspondence regarding same.	\$870	0.2	\$174.00								
	5/20/2020 Healey, Christopher J.	Office conference regarding corrected filing.	\$870	0.1	\$87.00								
	5/20/2020 Healey, Christopher J.	Telephone conference with team regarding same.	\$870	0.2	\$174.00								
	5/20/2020 Healey, Christopher J.	Review meet and confer response to Attorney Gorman regarding filing issues.	\$870	0.2	\$174.00								
	5/20/2020 Healey, Christopher J.	Correspondence regarding expert costs issues.	\$870	0.1	\$87.00								
	5/20/2020 Valero, Carmen A.	Research CACD cases addressing the issue of whether a party can take multiple Rule 30(b)(6) depositions, for C. Healey.	\$360	0.6	\$216.00								
	5/21/2020 Healey, Christopher J.	Review Attorney Gorman's correspondence regarding filing issues.	\$870	0.1	\$87.00								
	5/21/2020 Healey, Christopher J.	Draft proposed response.	\$870	0.2	\$174.00								
	5/21/2020 Healey, Christopher J.	Correspondence with team regarding same.	\$870	0.2	\$174.00								
	5/21/2020 Healey, Christopher J.	Revise class certification brief.	\$870	0.3	\$261.00								
	5/21/2020 Healey, Christopher J.	Correspondence with team regarding same.	\$870	0.2	\$174.00								
	5/21/2020 Healey, Christopher J.	Office conference regarding updated filing.	\$870	0.2	\$174.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
		Correspondence with Attorney Johnson regarding meet and confer position.	\$870	0.3		\$261.00									
	5/21/2020 Healey, Christopher J.	Revise meet and confer response to Attorney Gorman.	\$870	0.1		\$87.00									
	5/21/2020 Healey, Christopher J.	Review and comment on application to file under seal.	\$870	0.2		\$174.00									
	5/22/2020 Healey, Christopher J.	Review Attorney Gorman's email regarding expert disclosure issues.	\$870	0.1		\$87.00									
	5/22/2020 Healey, Christopher J.	Review and revise sealing application.	\$870	0.2		\$174.00									
	5/22/2020 Healey, Christopher J.	Outline to-do list for class motion.	\$870	0.1		\$87.00									
	5/22/2020 Healey, Christopher J.	Prepare correspondence to team regarding Gorman meet and confer.	\$870	0.8		\$696.00									
	5/22/2020 Healey, Christopher J.	Review correspondence regarding meet and confer.	\$870	0.1		\$87.00									
	5/22/2020 Healey, Christopher J.	Review draft meet and confer letter.	\$870	0.2		\$174.00									
	5/22/2020 Healey, Christopher J.	Prepare correspondence to Pat Kennedy's office regarding expert materials.	\$870	0.1		\$87.00									
	5/22/2020 Healey, Christopher J.	Review and revise letter regarding Aegis protective order materials.	\$870	0.2		\$174.00									
	5/22/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre and Attorney Johnson regarding meet and confer with Gibson Dunn.	\$870	0.8		\$696.00									
	5/22/2020 Healey, Christopher J.	Review and comment regarding proposed Sunrise stipulation.	\$870	0.2		\$174.00									
	5/23/2020 Healey, Christopher J.	Review revised meet and confer letter.	\$870	0.2		\$174.00									
	5/23/2020 Healey, Christopher J.	Review revised stipulation and comment regarding same.	\$870	0.1		\$87.00									
	5/23/2020 Healey, Christopher J.	Review and respond regarding summary of meet and confer on class motion.	\$870	0.3		\$261.00									
	5/23/2020 Healey, Christopher J.	Review Sunrise's request for production of documents (Set Three) and outline potential objections.	\$870	0.3		\$261.00									
	5/23/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding case status.	\$870	0.2		\$174.00									
	5/23/2020 Healey, Christopher J.	Prepare correspondence regarding supplemental witness disclosure.	\$870	0.2		\$174.00									
	5/23/2020 Healey, Christopher J.	Review Sunrise interrogatories 20, 21.	\$870	0.2		\$174.00									
	5/23/2020 Healey, Christopher J.	Outline proposed response regarding interrogatories.	\$870	0.1		\$87.00									
	5/23/2020 Healey, Christopher J.	Prepare correspondence regarding Gibson's demand for redacted declarations.	\$870	0.1		\$87.00									
	5/23/2020 Healey, Christopher J.	Prepare correspondence to team regarding Sunrise's request for production of documents (Set Three).	\$870	0.1		\$87.00									
	5/24/2020 Healey, Christopher J.	Outline response argument regarding class motion.	\$870	0.2		\$174.00									
	5/24/2020 Healey, Christopher J.	Review Ann Lacey's background information and prepare correspondence regarding same.	\$870	0.2		\$174.00									
	5/25/2020 Healey, Christopher J.	Outline to-do list.	\$870	0.5		\$435.00									
	5/25/2020 Healey, Christopher J.	Research and analysis regarding Judge Staton's decision.	\$870	0.6		\$522.00									
	5/26/2020 Cocchia, Robert A.	Review and exchange emails regarding discovery issues.	\$780	0.8		\$624.00									
	5/26/2020 Healey, Christopher J.	Correspondence regarding Sunrise census data.	\$870	0.1		\$87.00									
	5/26/2020 Healey, Christopher J.	Review updated order regarding redaction issues.	\$870	0.1		\$87.00									
	5/26/2020 Healey, Christopher J.	Response to Attorney Marks' question regarding census data.	\$870	0.2		\$174.00									
	5/26/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding case status and discovery.	\$870	0.2		\$174.00									
	5/26/2020 Healey, Christopher J.	Correspondence regarding Sunrise discovery issues.	\$870	0.2		\$174.00									
	5/26/2020 Healey, Christopher J.	Review and revise response to Sunrise RFPs (Set 3).	\$870	0.7		\$609.00									
	5/26/2020 Healey, Christopher J.	Review background information regarding Ann Lacey.	\$870	0.1		\$87.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>		
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>
	5/26/2020 Healey, Christopher J.	Prepare correspondence to team regarding update to witness disclosure.	\$870	1		\$870.00							
	5/26/2020 Healey, Christopher J.	Review and comment on stipulation regarding sealing issue.	\$870	0.2		\$174.00							
	5/26/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding discovery requests and related issues.	\$870	0.3		\$261.00							
	5/26/2020 Healey, Christopher J.	Prepare correspondence regarding discovery responses.	\$870	0.1		\$87.00							
	5/27/2020 Cocchia, Robert A.	Review and exchange emails regarding motion to compel further production of assessment and service plan information.	\$780	0.4		\$312.00							
	5/27/2020 Cocchia, Robert A.	Review multiple correspondence from opposing counsel regarding motion for class certification and issues regarding same.	\$780	0.3		\$234.00							
	5/27/2020 Cocchia, Robert A.	Telephone conference with Attorney Healey regarding discovery status.	\$780	0.5		\$390.00							
	5/27/2020 Cocchia, Robert A.	Legal research regarding production of ESI and federal rules regarding same.	\$780	2.3		\$1,794.00							
	5/27/2020 Cocchia, Robert A.	Begin draft motion to compel further production of assessment information.	\$780	3.1		\$2,418.00							
	5/27/2020 Healey, Christopher J.	Response regarding revisions to Plaintiffs' response to Sunrise's third request for production.	\$870	0.2		\$174.00							
	5/27/2020 Healey, Christopher J.	Correspondence regarding Flores production.	\$870	0.1		\$87.00							
	5/27/2020 Healey, Christopher J.	Correspondence regarding font issue for declarations.	\$870	0.2		\$174.00							
	5/27/2020 Healey, Christopher J.	Draft supplemental response to Rogs 20-21.	\$870	0.8		\$696.00							
	5/27/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1		\$87.00							
	5/27/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding discovery issues.	\$870	0.1		\$87.00							
	5/27/2020 Healey, Christopher J.	Review and revise supplemental witness disclosure.	\$870	0.5		\$435.00							
	5/27/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$870	0.1		\$87.00							
	5/27/2020 Healey, Christopher J.	Review and revise supplemental responses to Rogs 20-21.	\$870	1		\$870.00							
	5/27/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding same.	\$870	0.1		\$87.00							
	5/27/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$870	0.1		\$87.00							
	5/27/2020 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding discovery motion and related issues.	\$870	0.2		\$174.00							
	5/27/2020 Healey, Christopher J.	Review Gibson demand to delete Healey declaration.	\$870	0.2		\$174.00							
	5/27/2020 Healey, Christopher J.	Review declaration and argument raised.	\$870	0.4		\$348.00							
	5/27/2020 Healey, Christopher J.	Prepare correspondence to Carmen Valero regarding follow-up research.	\$870	0.1		\$87.00							
	5/27/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.3		\$261.00							
	5/27/2020 Healey, Christopher J.	Review cases cited in Sunrise demand to strike Healey declaration.	\$870	0.5		\$435.00							
	5/27/2020 Healey, Christopher J.	Review Sunrise demand regarding expert discovery.	\$870	0.2		\$174.00							
	5/27/2020 Healey, Christopher J.	Review documents regarding Ann Lacey.	\$870	0.3		\$261.00							
	5/27/2020 Healey, Christopher J.	Correspondence regarding assessment data issues.	\$870	0.2		\$174.00							
	5/28/2020 Cocchia, Robert A.	Draft motion to compel further production of assessment and service plan information.	\$780	6		\$4,680.00							
	5/28/2020 Cocchia, Robert A.	Participate in team call regarding discovery issues and going forward strategy.	\$780	1.7		\$1,326.00							
	5/28/2020 Healey, Christopher J.	Review court scheduling order and prepare correspondence regarding follow-up.	\$870	0.1		\$87.00							

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>		
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>
	5/28/2020 Healey, Christopher J.	Draft response regarding Sunrise threatened motion to strike Healey declaration.	\$870	1.2		\$1,044.00							
	5/28/2020 Healey, Christopher J.	Prepare correspondence regarding Sunrise's discovery responses.	\$870	0.1		\$87.00							
	5/28/2020 Healey, Christopher J.	Prepare for team call regarding discovery issues.	\$870	0.3		\$261.00							
	5/28/2020 Healey, Christopher J.	Telephone conference with team regarding Sunrise's motion to strike expert declarations	\$870	1.6		\$1,392.00			1.6	1,392.00			
	5/28/2020 Healey, Christopher J.	Prepare correspondence to Pat Kennedy's office regarding expert materials.	\$870	0.1		\$87.00							
	5/28/2020 Healey, Christopher J.	Correspondence with Attorney Thornton regarding assessment data issue.	\$870	0.3		\$261.00							
	5/28/2020 Healey, Christopher J.	Prepare correspondence to Attorney Cocchia regarding motion to compel assessment data.	\$870	0.1		\$87.00							
	5/28/2020 Healey, Christopher J.	Review Gibson letter opposing assessment data and follow-up regarding same.	\$870	0.2		\$174.00							
	5/28/2020 Healey, Christopher J.	Correspondence with Attorney Cocchia regarding data discovery motion.	\$870	0.1		\$87.00							
	5/28/2020 Healey, Christopher J.	Draft follow-up discovery requests.	\$870	1.5		\$1,305.00							
	5/28/2020 Healey, Christopher J.	Review Kennedy's document production.	\$870	0.1		\$87.00							
	5/28/2020 Healey, Christopher J.	Correspondence regarding data extraction process.	\$870	0.10		\$87.00							
	5/28/2020 Healey, Christopher J.	Review and comment on expert discovery letter.	\$870	0.2		\$174.00							
	5/28/2020 Myrick, Tracy R.	Prepare client production and provide to Co-Counsel.	\$195	0.8		\$156.00							
	5/28/2020 Myrick, Tracy R.	Download Plaintiff 3/31/2020 production provided by Co-Counsel.	\$195	0.5		\$97.50							
	5/28/2020 Myrick, Tracy R.	Various communications regarding status of San Mateo Data Assessment project.	\$195	0.2		\$39.00							
	5/28/2020 Myrick, Tracy R.	Prepare spreadsheet showing files assigned to the volunteers and provide to caseteam.	\$195	0.5		\$97.50							
	5/29/2020 Cocchia, Robert A.	Draft motion to compel further production of assessment and service plan data and research regarding same.	\$780	4.2		\$3,276.00							
	5/29/2020 Cocchia, Robert A.	Review and exchange emails regarding expert witness declaration in support of motion to compel.	\$780	0.6		\$468.00							
	5/29/2020 Cocchia, Robert A.	Telephone conference with Attorney Healey regarding motion to compel and strategy for same.	\$780	0.3		\$234.00							
	5/29/2020 Healey, Christopher J.	Correspondence with Attorneys Johnson and Erickson regarding arbitration research project.	\$870	0.2		\$174.00							
	5/29/2020 Healey, Christopher J.	Prepare correspondence to team regarding arbitration issues and review Sunrise filing regarding same.	\$870	1.5		\$1,305.00							
	5/29/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding data expert.	\$870	0.1		\$87.00							
	5/29/2020 Healey, Christopher J.	Correspondence regarding expert discovery production.	\$870	0.1		\$87.00							
	5/29/2020 Healey, Christopher J.	Review draft motion regarding assessment data.	\$870	0.3		\$261.00							
	5/29/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.2		\$174.00							
	5/29/2020 Healey, Christopher J.	Further correspondence regarding arbitration issues.	\$870	0.3		\$261.00							
	5/29/2020 Healey, Christopher J.	Prepare for call regarding arbitration issues.	\$870	0.3		\$261.00							
	5/29/2020 Healey, Christopher J.	Telephone conference with Attorneys Erickson and Warren regarding arbitration issues and arguments to support class motion.	\$870	0.6		\$522.00							
	5/29/2020 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding motion to compel data documentation.	\$870	0.3		\$261.00							

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>	<u>Fees</u>	<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	5/29/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.3	\$261.00								
	5/29/2020 Healey, Christopher J.	Review and revise supplemental response to Interrogatories 20 and 21.	\$870	0.2	\$174.00								
	5/29/2020 Healey, Christopher J.	Review and comment on Attorney Marks' proposal regarding damage analysis.	\$870	0.2	\$174.00								
	5/29/2020 Healey, Christopher J.	Review cases regarding Sunrise arbitration clause.	\$870	0.1	\$87.00								
	5/29/2020 Healey, Christopher J.	Review and respond to Attorney Mark's email regarding case schedule.	\$870	0.1	\$87.00								
	5/29/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding challenge to Healey declaration.	\$870	0.1	\$87.00								
	5/29/2020 Myrick, Tracy R.	Update production log to reflect recent Plaintiff Productions.	\$195	0.3	\$58.50								
	5/29/2020 Myrick, Tracy R.	Provide caseteam with link to location of Plaintiff production.	\$195	0.1	\$19.50								
	5/30/2020 Healey, Christopher J.	Review Attorney Marks' correspondence regarding expert support for data motion.	\$870	0.1	\$87.00								
	5/30/2020 Healey, Christopher J.	Outline reply brief issues.	\$870	0.1	\$87.00								
	5/30/2020 Healey, Christopher J.	Review and revise motion to compel assessment data.	\$870	0.8	\$696.00								
	5/31/2020 Healey, Christopher J.	Revise motion to compel assessment data.	\$870	0.4	\$348.00								
	5/31/2020 Healey, Christopher J.	Correspondence with Tracy Myrick regarding data extraction issues.	\$870	0.2	\$174.00								
	5/31/2020 Healey, Christopher J.	Prepare correspondence to team regarding insert on data extraction issue.	\$870	0.3	\$261.00								
	5/31/2020 Healey, Christopher J.	Revise motion to compel assessment data.	\$870	1.7	\$1,479.00								
	5/31/2020 Healey, Christopher J.	Prepare correspondence to team regarding follow-up issues.	\$870	0.1	\$87.00								
	5/31/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding expert costs.	\$870	0.1	\$87.00								
	5/31/2020 Myrick, Tracy R.	Run search for each facility for Assessment data in Relativity and provide results to caseteam.	\$195	1	\$195.00								
	6/1/2020 Cocchia, Robert A.	Telephone conference with Attorney Healey regarding discovery strategy.	\$780	0.4	\$312.00								
	6/1/2020 Cocchia, Robert A.	Research issues regarding database structure and PointClickCare.	\$780	0.7	\$546.00								
	6/1/2020 Cocchia, Robert A.	Review Sunrise marketing material regarding same.	\$780	1.9									
	6/1/2020 Cocchia, Robert A.	Draft email regarding expert witness declaration for motion to compel regarding database issue.	\$780	0.4	\$312.00								
	6/1/2020 Cocchia, Robert A.	Review and exchange emails with Attorney Healey regarding motion to compel assessment data.	\$780	0.3	\$234.00								
	6/1/2020 Cocchia, Robert A.	Review draft expert declaration regarding assessment data.	\$780	0.2	\$156.00								
	6/1/2020 Cocchia, Robert A.	Continue drafting omnibus discovery declaration.	\$780	1.1	\$858.00	1.1	858.00						
	6/1/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding expert invoices.	\$870	0.1	\$87.00								
	6/1/2020 Healey, Christopher J.	Review Attorney Cocchia's correspondence regarding data motion.	\$870	0.1	\$87.00								
	6/1/2020 Healey, Christopher J.	Review Attorney Johnson's correspondence regarding expert support for data motion.	\$870	0.1	\$87.00								
	6/1/2020 Healey, Christopher J.	Correspondence regarding completed assessment.	\$870	0.1	\$87.00								
	6/1/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding data motion.	\$870	0.3	\$261.00								
	6/1/2020 Healey, Christopher J.	Review correspondence from Attorney Johnson regarding data motion issue.	\$870	0.2	\$174.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>			
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	6/1/2020 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding expert support for class motion.	\$870	0.2		\$174.00								
	6/1/2020 Healey, Christopher J.	Prepare correspondence to Attorney Johnson regarding data motion and expert support.	\$870	0.2		\$174.00								
	6/1/2020 Healey, Christopher J.	Revise motion to compel assessment data.	\$870	0.3		\$261.00								
	6/1/2020 Healey, Christopher J.	Review and comment on Flores invoice format.	\$870	0.1		\$87.00								
	6/1/2020 Healey, Christopher J.	Draft outline of supporting declaration for data motion.	\$870	1		\$870.00								
	6/1/2020 Healey, Christopher J.	Review James Thornton's email regarding data extraction project.	\$870	0.1		\$87.00								
	6/1/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.2		\$174.00								
	6/1/2020 Healey, Christopher J.	Review correspondence regarding SCC training manual.	\$870	0.2		\$174.00								
	6/1/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00								
	6/1/2020 Healey, Christopher J.	Review Attorney Erickson's rate regarding unconscionability issues and responded.	\$870	0.2		\$174.00								
	6/1/2020 Healey, Christopher J.	review Attorney Marks' correspondence regarding expert costs, prepare correspondence to Attorneys Wallace and Stebner regarding same.	\$870	0.1		\$87.00								
	6/1/2020 Myrick, Tracy R.	Uploaded Plaintiff production and provided caseteam link to location.	\$195	0.1		\$19.50								
	6/1/2020 Myrick, Tracy R.	Various communications with Dentons volunteers regarding data extraction for San Mateo, conference call with J. Thornton regarding same.	\$195	0.5		\$97.50								
	6/1/2020 Myrick, Tracy R.	Update spreadsheet regarding time spent on San Mateo data extraction project.	\$195	1.2		\$234.00								
	6/2/2020 Cocchia, Robert A.	Review and exchange emails with team regarding ESI and data issues.	\$780	0.3		\$234.00								
	6/2/2020 Cocchia, Robert A.	Review Sunrise's responses to request for production, set four, and draft email to team regarding follow up for same.	\$780	0.4		\$312.00								
	6/2/2020 Cocchia, Robert A.	Review and exchange emails regarding draft meet and confer on requests for production of documents, sets 3 and 4.	\$780	0.6		\$468.00								
	6/2/2020 Cocchia, Robert A.	Continue work on omnibus declaration regarding meet and confer history with opposing counsel and review file regarding same.	\$780	2.1		\$1,638.00			2.1		1,638.00			
	6/2/2020 Healey, Christopher J.	Draft meet and confer letter regarding various discovery requests.	\$870	2.3		\$2,001.00								
	6/2/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding census data.	\$870	0.2		\$174.00								
	6/2/2020 Healey, Christopher J.	Prepare correspondence to team regarding ESI issues.	\$870	0.2		\$174.00								
	6/2/2020 Healey, Christopher J.	Telephone conference with Tracy Myrick regarding data extraction project and assessments.	\$870	0.3		\$261.00								
	6/2/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding census data issue.	\$870	0.1		\$87.00								
	6/2/2020 Healey, Christopher J.	Review Attorney Cocchia's correspondence regarding meet and confer letter.	\$870	0.2		\$174.00								
	6/2/2020 Healey, Christopher J.	Revise meet and confer letter.	\$870	1.2		\$1,044.00								
	6/2/2020 Healey, Christopher J.	Telephone conference with Lucy Valdez regarding assessment summary.	\$870	0.2		\$174.00								
	6/2/2020 Healey, Christopher J.	Review Tracy Myrick's summary.	\$870	0.1		\$87.00								
	6/2/2020 Healey, Christopher J.	Correspondence regarding arbitration decision - Harris.	\$870	0.2		\$174.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	6/2/2020 Healey, Christopher J.	Review Harris decision regarding arbitration issues and prepare correspondence regarding same.	\$870	1.5		\$1,305.00							
	6/2/2020 Healey, Christopher J.	Outline discovery issues and to-do list.	\$870	0.3		\$261.00							
	6/2/2020 Healey, Christopher J.	Review Erickson correspondence regarding Harris decision.	\$870	0.2		\$174.00							
	6/2/2020 Healey, Christopher J.	Correspondence regarding ESI discovery and custodian list.	\$870	0.2		\$174.00							
	6/2/2020 Healey, Christopher J.	Review Gibson Dunn email regarding Healey declaration.	\$870	0.1		\$87.00							
	6/2/2020 Healey, Christopher J.	Draft proposed response.	\$870	0.1		\$87.00							
	6/2/2020 Healey, Christopher J.	Analysis regarding data extraction timing.	\$870	0.3		\$261.00							
	6/2/2020 Healey, Christopher J.	Outline insert to data motion.	\$870	0.1		\$87.00							
	6/2/2020 Myrick, Tracy R.	Work on adding information to spreadsheet to show how many assessments were completed.	\$195	0.9		\$175.50							
	6/2/2020 Myrick, Tracy R.	Review pdfs that were assigned to Dentons staff to determine number of assessments in each pdf.	\$195	0.5		\$97.50							
	6/2/2020 Myrick, Tracy R.	Conference call with C. Healey regarding same.	\$195	0.1		\$19.50							
	6/2/2020 Myrick, Tracy R.	Transfer various case materials to J. Thornton via Accellion.	\$195	0.1		\$19.50							
	6/2/2020 Myrick, Tracy R.	Email San Mateo Assessment data sample to J. Thornton.	\$195	0.2		\$39.00							
	6/3/2020 Cocchia, Robert A.	Analyze draft expert declaration in support of motion to compel further production of assessment information, supporting documents and revisions to motion to compel.	\$780	0.8		\$624.00							
	6/3/2020 Cocchia, Robert A.	Telephone conference with Attorney Healey regarding further meet and confer regarding request for production of documents to Sunrise.	\$780	0.3		\$234.00							
	6/3/2020 Cocchia, Robert A.	Review materials regarding unlawful detainer actions and review and exchange emails regarding same.	\$780	1.1		\$858.00							
	6/3/2020 Cocchia, Robert A.	Review and exchange emails regarding discovery issues.	\$780	0.6		\$468.00							
	6/3/2020 Healey, Christopher J.	Review and revise meet and confer letter regarding Shiferaw and other requests.	\$870	0.5		\$435.00							
	6/3/2020 Healey, Christopher J.	Correspondence regarding ESI meet and confer letter.	\$870	0.2		\$174.00							
	6/3/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding expert analysis and budget and correspondence to Attorney Stebner regarding same.	\$870	0.2		\$174.00							
	6/3/2020 Healey, Christopher J.	Correspondence with James Thornton regarding data extraction project.	\$870	0.1		\$87.00							
	6/3/2020 Healey, Christopher J.	Prepare analysis of total assessment number for sample facilities.	\$870	0.5		\$435.00							
	6/3/2020 Healey, Christopher J.	Revise class motion.	\$870	0.2		\$174.00							
	6/3/2020 Healey, Christopher J.	Review U.S. Superior Court case regarding McGill public injunction issue.	\$870	0.2		\$174.00							
	6/3/2020 Healey, Christopher J.	Review letter regarding ESI production/comment regarding same.	\$870	0.2		\$174.00							
	6/3/2020 Healey, Christopher J.	Correspondence regarding ESI letter.	\$870	0.1		\$87.00							
	6/3/2020 Healey, Christopher J.	Revise meet and confer letter regarding RFPs, 4th set.	\$870	0.2		\$174.00							
	6/3/2020 Healey, Christopher J.	Prepare correspondence to Attorneys Umpierre and Marks regarding same.	\$870	0.1		\$87.00							
	6/3/2020 Healey, Christopher J.	Review draft Peters' declaration in support of data motion.	\$870	0.5		\$435.00							
	6/3/2020 Healey, Christopher J.	Review Attorney Johnson's correspondence regarding data production issues and caselaw.	\$870	1		\$870.00							
	6/3/2020 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding data issue motion.	\$870	0.3		\$261.00							

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	6/3/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding second meet and confer letter.	\$870	0.2		\$174.00									
	6/3/2020 Healey, Christopher J.	Revise Peters' declaration.	\$870	2.1		\$1,827.00									
	6/3/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.2		\$174.00									
	6/3/2020 Healey, Christopher J.	Revise motion to compel assessment data.	\$870	0.1		\$87.00									
	6/3/2020 Valero, Carmen A.	Research Sunrise UD/eviction and small claim litigation since 2012, for C. Healey.	\$360	1		\$360.00									
	6/4/2020 Cocchia, Robert A.	Draft declaration in support of motion to compel further production of assessments and service plan information.	\$780	1.5		\$1,170.00									
	6/4/2020 Cocchia, Robert A.	Pull exhibits for declaration in support of motion.	\$780	0.4		\$312.00									
	6/4/2020 Cocchia, Robert A.	Review and exchange emails regarding motion and simultaneous discovery disputes.	\$780	0.8		\$624.00									
	6/4/2020 Healey, Christopher J.	Correspondence regarding Peters' declaration.	\$870	0.1		\$87.00									
	6/4/2020 Healey, Christopher J.	Revise Peters' declaration.	\$870	0.2		\$174.00									
	6/4/2020 Healey, Christopher J.	Prepare correspondence to Attorney Arns regarding key depositions.	\$870	0.2		\$174.00		0.2	174.00						
	6/4/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1		\$87.00									
	6/4/2020 Healey, Christopher J.	Correspondence with Attorney Cocchia regarding motion.	\$870	0.1		\$87.00									
	6/4/2020 Healey, Christopher J.	Revise Blake Peters' declaration.	\$870	0.7		\$609.00									
	6/4/2020 Healey, Christopher J.	Correspondence regarding same.	\$870	0.2		\$174.00									
	6/4/2020 Healey, Christopher J.	Review Gibson's email regarding motion to strike Healey declaration.	\$870	0.1		\$87.00									
	6/4/2020 Healey, Christopher J.	Revise Cocchia declaration in support of data motion.	\$870	0.9		\$783.00									
	6/4/2020 Healey, Christopher J.	Revise data motion.	\$870	1.6		\$1,392.00									
	6/4/2020 Healey, Christopher J.	Correspondence with Attorney Arns regarding depositions.	\$870	0.2		\$174.00		0.2	174.00						
	6/4/2020 Healey, Christopher J.	Rurther revisions to Peters' declaration.	\$870	0.2		\$174.00									
	6/4/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding motion to strike Healey declaration.	\$870	0.3		\$261.00									
	6/4/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding case strategy and tactics.	\$870	0.2		\$174.00									
	6/4/2020 Myrick, Tracy R.	Upload J. Slichta errata sheet to shared drive and provide caseteam link to location.	\$195	0.1		\$19.50									
	6/5/2020 Cocchia, Robert A.	Review and exchange multiple emails regarding motion to compel further responses regarding assessment and service plan data.	\$780	0.4		\$312.00									
	6/5/2020 Cocchia, Robert A.	Review final motion to compel.	\$780	0.8		\$624.00									
	6/5/2020 Cocchia, Robert A.	Draft email to Sunrise regarding service of motion.	\$780	0.2		\$156.00									
	6/5/2020 Healey, Christopher J.	Revise data motion.	\$870	0.4		\$348.00									
	6/5/2020 Healey, Christopher J.	Revise Peters declaration.	\$870	0.2		\$174.00									
	6/5/2020 Healey, Christopher J.	Follow-up correspondence regarding data motion and Peters' declaration.	\$870	0.1		\$87.00									
	6/5/2020 Healey, Christopher J.	Follow-up correspondence regarding Gibson's demand to meet and confer regarding Interrogatories 20-21.	\$870	0.1		\$87.00									
	6/5/2020 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding supplemental interrogatory responses.	\$870	0.2		\$174.00									
	6/5/2020 Healey, Christopher J.	Review updated joint statement regarding data motion.	\$870	0.2		\$174.00									
	6/5/2020 Healey, Christopher J.	Revise Healey declaration to address threatened motion to strike.	\$870	0.5		\$435.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	6/5/2020 Healey, Christopher J.	Revise requests for production of documents (set 6) and prepare correspondence to team regarding same.	\$870	0.3		\$261.00									
	6/5/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding Peters declaration.	\$870	0.2		\$174.00									
	6/5/2020 Healey, Christopher J.	Revise Peters declaration.	\$870	0.2		\$174.00									
	6/5/2020 Healey, Christopher J.	Follow-up correspondence regarding Peters' declaration.	\$870	0.1		\$87.00									
	6/5/2020 Healey, Christopher J.	Review meet and confer letter regarding Interrogatories 15-19 and supplemental response.	\$870	0.3		\$261.00									
	6/5/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding supplemental responses.	\$870	0.7		\$609.00									
	6/5/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding expert costs and related issues.	\$870	0.1		\$87.00									
	6/5/2020 Healey, Christopher J.	Correspondence regarding data motion and supporting exhibits.	\$870	0.4		\$348.00									
	6/5/2020 Healey, Christopher J.	Telephone conferences with Attorney Cocchia regarding same.	\$870	0.2		\$174.00									
	6/6/2020 Healey, Christopher J.	Revise Healey declaration in response to Defendants' motion to strike threat.	\$870	3.6		\$3,132.00		3.6	3,132.00						
	6/7/2020 Healey, Christopher J.	Continue revising Healey declaration in response to Defendants' motion to strike threat.	\$870	1.5		\$1,305.00		1.5	1,305.00						
	6/7/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00									
	6/7/2020 Healey, Christopher J.	Prepare correspondence to Attorneys Warren and Erickson regarding arbitration decision.	\$870	0.1		\$87.00									
	6/7/2020 Healey, Christopher J.	Review Gibson's correspondence reading Flores subpoena.	\$870	0.1		\$87.00									
	6/8/2020 Healey, Christopher J.	Prepare correspondence regarding class certification motion errata and Slichta deposition cites.	\$870	0.1		\$87.00									
	6/8/2020 Healey, Christopher J.	Correspondence regarding discovery requests.	\$870	0.1		\$87.00									
	6/8/2020 Healey, Christopher J.	Review stipulation regarding expert deposition extension and prepare correspondence regarding same.	\$870	0.2		\$174.00									
	6/8/2020 Healey, Christopher J.	Prepare correspondence regarding expert costs.	\$870	0.1		\$87.00									
	6/8/2020 Healey, Christopher J.	Revise requests for production of documents (set six).	\$870	0.2		\$174.00									
	6/8/2020 Healey, Christopher J.	Correspondence with Attorney Johnson regarding motion to strike declaration.	\$870	0.2		\$174.00									
	6/8/2020 Healey, Christopher J.	Review and comment on joint statement regarding data issue.	\$870	0.1		\$87.00									
	6/8/2020 Healey, Christopher J.	Draft correspondence to Arns' office regarding Lacey and Ginder depositions.	\$870	1.3		\$1,131.00		1.3	1,131.00						
	6/8/2020 Healey, Christopher J.	Correspondence with Marks' office regarding assessment data project.	\$870	0.1		\$87.00									
	6/8/2020 Healey, Christopher J.	Office conference regarding response to Sunrise threat to strike Healey declaration.	\$870	0.1		\$87.00									
	6/8/2020 Healey, Christopher J.	Review Gibson's correspondence regarding discovery responses.	\$870	0.1		\$87.00									
	6/8/2020 Healey, Christopher J.	Prepare correspondence to team regarding Gibson request for further responses and Interrogatories 20-21.	\$870	0.2		\$174.00									
	6/9/2020 Cocchia, Robert A.	Review and exchange emails regarding motion to compel.	\$780	0.3		\$234.00									
	6/9/2020 Cocchia, Robert A.	Work on omnibus declaration regarding discovery.	\$780	1.1		\$858.00									
	6/9/2020 Healey, Christopher J.	Review correspondence regarding discovery issues.	\$870	0.1		\$87.00									
	6/9/2020 Healey, Christopher J.	Correspondence regarding Kennedy invoice.	\$870	0.1		\$87.00									
	6/9/2020 Healey, Christopher J.	Correspondence with Attorney Cocchia regarding data motion and delivery issue.	\$870	0.1		\$87.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	6/9/2020 Healey, Christopher J.	Prepare correspondence to team regarding Julie Erickson engagement.	\$870	0.1		\$87.00									
	6/9/2020 Healey, Christopher J.	Review and comment on Schroyer invoice summary.	\$870	0.1		\$87.00									
	6/9/2020 Healey, Christopher J.	Correspondence regarding expert document production.	\$870	0.1		\$87.00									
	6/10/2020 Healey, Christopher J.	Review correspondence regarding data extraction project.	\$870	0.2		\$174.00									
	6/10/2020 Healey, Christopher J.	Revise request for production of documents, set six.	\$870	0.6		\$522.00									
	6/10/2020 Healey, Christopher J.	Draft interrogatories regarding arbitration issues.	\$870	0.7		\$609.00									
	6/10/2020 Healey, Christopher J.	Revise interrogatories and conference regarding same.	\$870	0.2		\$174.00									
	6/10/2020 Healey, Christopher J.	Review and revise supplemental responses to interrogatories 15-19.	\$870	0.5		\$435.00									
	6/10/2020 Healey, Christopher J.	Review Gibson's letter regarding ESI and outstanding discovery.	\$870	0.2		\$174.00									
	6/10/2020 Healey, Christopher J.	Prepare correspondence to team regarding proposed response.	\$870	0.3		\$261.00									
	6/10/2020 Healey, Christopher J.	Follow-up correspondence regarding interrogatories 15-19.	\$870	0.1		\$87.00									
	6/10/2020 Sykes, Cheryl E.	Analyze Sunrise data and enter pertinent information ion Sunrise Assessment Data spreadsheet for attorney review and case plan.	\$195	4.2		\$819.00									
	6/11/2020 Cocchia, Robert A.	Work on omnibus declaration regarding history of discovery disputes with Sunrise.	\$780	3		\$2,340.00									
	6/11/2020 Cocchia, Robert A.	Review and exchange case related email.	\$780	0.5		\$390.00									
	6/11/2020 Healey, Christopher J.	Revise supplemental responses to Interrogatories 15-19.	\$870	1.8		\$1,566.00									
	6/11/2020 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding same.	\$870	0.2		\$174.00									
	6/11/2020 Healey, Christopher J.	Review correspondence regarding Gibson's discovery demands.	\$870	0.1		\$87.00									
	6/11/2020 Healey, Christopher J.	Review Attorney Johnson's response to Gibson's discovery position and comment regarding same.	\$870	0.2		\$174.00									
	6/11/2020 Healey, Christopher J.	Prepare correspondence to team regarding FRCP 33 issue.	\$870	0.2		\$174.00									
	6/11/2020 Sykes, Cheryl E.	Analyze Sunrise data and enter pertinent information ion Sunrise Assessment Data spreadsheet for attorney review and case plan.	\$195	4.5		\$877.50									
	6/12/2020 Cocchia, Robert A.	Draft omnibus declaration regarding history of discovery disputes with Sunrise.	\$780	4.7		\$3,666.00	4.7	3,666.00							
	6/12/2020 Healey, Christopher J.	Review Attorney Wallace's revisions to Healey declaration.	\$870	0.2		\$174.00									
	6/12/2020 Healey, Christopher J.	Review correspondence regarding revisions to class brief.	\$870	0.1		\$87.00									
	6/12/2020 Healey, Christopher J.	Revise Healey declaration in response to threatened motion to strike.	\$870	0.5		\$435.00	0.5	435.00							
	6/12/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding changes to Healey declaration.	\$870	0.2		\$174.00	0.2	174.00							
	6/12/2020 Healey, Christopher J.	Further revisions to Healey declaration.	\$870	0.1		\$87.00	0.1	87.00							
	6/12/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00	0.1	87.00							
	6/12/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding declaration and follow-up.	\$870	0.1		\$87.00	0.1	87.00							
	6/12/2020 Healey, Christopher J.	Review Attorney Marks' correspondence regarding expert costs and outline questions regarding same.	\$870	0.1		\$87.00									
	6/12/2020 Sykes, Cheryl E.	Analyze Sunrise data and enter pertinent information ion Sunrise Assessment Data spreadsheet for attorney review and case plan.	\$195	4.6		\$897.00									
	6/13/2020 Healey, Christopher J.	Draft agenda for conference call.	\$870	0.3		\$261.00									
	6/14/2020 Healey, Christopher J.	Prepare correspondence regarding discovery issues.	\$870	0.1		\$87.00									
	6/14/2020 Healey, Christopher J.	Prepare correspondence regarding team call and prepare summary of anticipated expert costs.	\$870	0.2		\$174.00									

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	6/15/2020 Healey, Christopher J.	Correspondence regarding Gibson's request for extension on data motion.	\$870	0.1	\$87.00								
	6/15/2020 Healey, Christopher J.	Correspondence regarding expert costs and follow-up correspondence regarding same.	\$870	0.3	\$261.00								
	6/15/2020 Healey, Christopher J.	Review court order regarding expert depositions.	\$870	0.1	\$87.00								
	6/15/2020 Healey, Christopher J.	Correspondence with Gibson regarding data motion extension.	\$870	0.2	\$174.00								
	6/15/2020 Healey, Christopher J.	Prepare for conference call and attend conference call regarding status and tactics.	\$870	0.4	\$348.00								
	6/15/2020 Healey, Christopher J.	Draft email to team regarding expert costs.	\$870	0.2	\$174.00								
	6/15/2020 Healey, Christopher J.	Prepare for conference call regarding discovery issues.	\$870	0.2	\$174.00								
	6/15/2020 Healey, Christopher J.	Telephone conference with team regarding discovery issues.	\$870	0.7	\$609.00			0.7	609.00				
	6/15/2020 Healey, Christopher J.	Research regarding Daubert opposition arguments.	\$870	0.2	\$174.00								
	6/15/2020 Myrick, Tracy R.	Download 6/9/2020 Plaintiff production to shared drive and update production log regarding same.	\$195	0.4	\$78.00								
	6/15/2020 Sykes, Cheryl E.	Analyze Sunrise data and enter pertinent information ion Sunrise Assessment Data spreadsheet for attorney review and case plan.	\$195	2.5	\$487.50								
	6/16/2020 Healey, Christopher J.	Review Gibson's correspondence regarding expert depositions.	\$870	0.1	\$87.00								
	6/16/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding same.	\$870	0.1	\$87.00								
	6/16/2020 Healey, Christopher J.	Prepare correspondence regarding amended Healey declaration.	\$870	0.1	\$87.00								
	6/16/2020 Healey, Christopher J.	Prepare correspondence to Arns' firm regarding Lacey and Ginder depositions.	\$870	0.2	\$174.00			0.2	174.00				
	6/16/2020 Healey, Christopher J.	Prepare correspondence regarding status of data extraction project.	\$870	0.1	\$87.00								
	6/16/2020 Healey, Christopher J.	Correspondence regarding case schedule.	\$870	0.1	\$87.00								
	6/16/2020 Healey, Christopher J.	Review and revise discovery meet and confer letter.	\$870	0.3	\$261.00								
	6/16/2020 Healey, Christopher J.	Follow-up correspondence regarding discovery meet and confer.	\$870	0.1	\$87.00								
	6/16/2020 Healey, Christopher J.	Office conferences regarding data extraction project.	\$870	0.2	\$174.00								
	6/16/2020 Healey, Christopher J.	Prepare correspondence to James Thornton regarding data project.	\$870	0.1	\$87.00								
	6/16/2020 Healey, Christopher J.	Review and respond to Attorney Johnson's question regarding meet and confer letter.	\$870	0.2	\$174.00								
	6/16/2020 Healey, Christopher J.	Review comment on discovery letter.	\$870	0.2	\$174.00								
	6/16/2020 Myrick, Tracy R.	Download 5/29/2020 Plaintiff Production to shared drive and update production log regarding same.	\$195	0.4	\$78.00								
	6/16/2020 Myrick, Tracy R.	Send follow-up emails to volunteers regarding the San Mateo data extraction project.	\$195	0.5	\$97.50								
	6/17/2020 Healey, Christopher J.	Review and revise interrogatories regarding arbitration issues.	\$870	0.2	\$174.00								
	6/17/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1	\$87.00								
	6/17/2020 Healey, Christopher J.	Prepare correspondence to team regarding Sunrise deposition schedule.	\$870	0.1	\$87.00								
	6/17/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding case schedule.	\$870	0.1	\$87.00								
	6/17/2020 Healey, Christopher J.	Prepare correspondence regarding Sunrise's response regarding data motion.	\$870	0.1	\$87.00								
	6/17/2020 Myrick, Tracy R.	Various email communications with volunteers regarding the San Mateo data extraction project.	\$195	0.8	\$156.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	6/18/2020 Healey, Christopher J.	Review Attorney Cocchia's correspondence regarding Sunrise's opposition to data motion.	\$870	0.1		\$87.00									
	6/18/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.2		\$174.00									
	6/18/2020 Healey, Christopher J.	Review file and outline response.	\$870	0.3		\$261.00									
	6/18/2020 Healey, Christopher J.	Review Gibson's proposed stipulation regarding expert discovery.	\$870	0.1		\$87.00									
	6/18/2020 Healey, Christopher J.	Prepare correspondence to team regarding suggested approach regarding data motion.	\$870	0.5		\$435.00									
	6/18/2020 Healey, Christopher J.	Review Maryott declaration regarding extension request.	\$870	0.1		\$87.00									
	6/18/2020 Healey, Christopher J.	Outline response regarding expert discovery stipulation.	\$870	0.2		\$174.00									
	6/18/2020 Healey, Christopher J.	Prepare correspondence to Tracy Myrick regarding data extraction project.	\$870	0.1		\$87.00									
	6/18/2020 Healey, Christopher J.	Prepare correspondence to Attorney Johnson regarding response on expert discovery stipulation.	\$870	0.1		\$87.00									
	6/18/2020 Healey, Christopher J.	Review Sunrise's opposition argument regarding data motion.	\$870	0.5		\$435.00									
	6/18/2020 Healey, Christopher J.	Outline proposed responses regarding same.	\$870	0.5		\$435.00									
	6/18/2020 Myrick, Tracy R.	Various communications with volunteers regarding San Mateo Data extraction project.	\$195	0.7		\$136.50									
	6/19/2020 Healey, Christopher J.	Review Gibson correspondence regarding discovery meet and confer.	\$870	0.1		\$87.00									
	6/19/2020 Healey, Christopher J.	Office conference regarding updated Healey declaration and Judge Early's procedures.	\$870	0.1		\$87.00									
	6/19/2020 Healey, Christopher J.	Review correspondence from defense counsel regarding stipulation and meet and confer.	\$870	0.2		\$174.00									
	6/19/2020 Healey, Christopher J.	Correspondence with Attorney Johnson regarding expert scheduling issue.	\$870	0.3		\$261.00									
	6/19/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1		\$87.00									
	6/19/2020 Healey, Christopher J.	Telephone conference with team regarding discovery and scheduling.	\$870	0.5		\$435.00				0.5	435.00				
	6/19/2020 Healey, Christopher J.	Telephone conference regarding expert costs and prepare correspondence to Attorney Stebner regarding same.	\$870	0.2		\$174.00									
	6/19/2020 Healey, Christopher J.	Telephone conference with Attorneys Johnson and Umpierre regarding discovery meet and confer preparation.	\$870	0.5		\$435.00									
	6/19/2020 Healey, Christopher J.	Review and revise Healey declaration.	\$870	0.8		\$696.00									
	6/19/2020 Healey, Christopher J.	Prepare notice of errata.	\$870	0.2		\$174.00									
	6/19/2020 Myrick, Tracy R.	Download 6/10/2020 Plaintiff production to shared drive and provide caseteam link to location, update production log regarding same.	\$195	0.6		\$117.00									
	6/19/2020 Myrick, Tracy R.	Various communications with C. Asher regarding San Mateo data extraction data.	\$195	0.2		\$39.00									
	6/20/2020 Healey, Christopher J.	Review draft adjustment to class certification schedule.	\$870	0.1		\$87.00									
	6/20/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.2		\$174.00									
	6/20/2020 Healey, Christopher J.	Revise Healey declaration.	\$870	0.1		\$87.00									
	6/20/2020 Healey, Christopher J.	Draft correspondence regarding Lacey/Ginder depositions.	\$870	0.6		\$522.00									
	6/20/2020 Healey, Christopher J.	Outline approach regarding schedule.	\$870	0.1		\$87.00									
	6/20/2020 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding expert costs issues.	\$870	0.1		\$87.00									
	6/21/2020 Healey, Christopher J.	Prepare for scheduling call, telephone conference with Attorney Marks regarding scheduling and related issues.	\$870	0.2		\$174.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	6/21/2020 Healey, Christopher J.	Prepare correspondence to team regarding deposition schedules and related issues.	\$870	0.3		\$261.00									
	6/21/2020 Healey, Christopher J.	Prepare correspondence regarding revised declaration.	\$870	0.2		\$174.00									
	6/21/2020 Healey, Christopher J.	Prepare correspondence regarding data motion meet and confer.	\$870	0.1		\$87.00									
	6/21/2020 Healey, Christopher J.	Follow-up correspondence regarding schedule issues.	\$870	0.2		\$174.00									
	6/22/2020 Healey, Christopher J.	Revise updated declaration.	\$870	0.2		\$174.00									
	6/22/2020 Healey, Christopher J.	Revise letter and deposition notices for Lacey and Ginder.	\$870	0.1		\$87.00									
	6/22/2020 Healey, Christopher J.	Office conference regarding deposition notices.	\$870	0.1		\$87.00									
	6/22/2020 Healey, Christopher J.	Review deposition notices regarding Lacey and Ginder.	\$870	0.3		\$261.00									
	6/22/2020 Healey, Christopher J.	Prepare correspondence to Attorney Arns regarding same.	\$870	0.1		\$87.00									
	6/22/2020 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding revised Healey declaration.	\$870	0.1		\$87.00									
	6/22/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding data motion and Blake Peters support.	\$870	0.2		\$174.00									
	6/22/2020 Healey, Christopher J.	Review draft arbitration opposition.	\$870	0.3		\$261.00									
	6/22/2020 Healey, Christopher J.	Prepare correspondence to Attorneys Warren and Erickson regarding same.	\$870	0.2		\$174.00									
	6/22/2020 Myrick, Tracy R.	Prepare and send follow-up email to C. Asher regarding San Mateo Data extraction project.	\$195	0.7		\$136.50									
	6/22/2020 Myrick, Tracy R.	Review San Mateo assessments to determine bates number of each assessment.	\$195	2		\$390.00									
	6/23/2020 Healey, Christopher J.	Correspondence from Gibson firm regarding expert depositions and correspondence to Pat Kennedy regarding same.	\$870	0.1		\$87.00									
	6/23/2020 Healey, Christopher J.	Correspondence from Gibson firm regarding declarant depositions.	\$870	0.1		\$87.00									
	6/23/2020 Healey, Christopher J.	Correspondence to team regarding same.	\$870	0.1		\$87.00									
	6/23/2020 Healey, Christopher J.	Review correspondence regarding data extraction project.	\$870	0.1		\$87.00									
	6/23/2020 Healey, Christopher J.	Review Attorney Marks correspondence regarding Sunrise/PointClick position on data.	\$870	0.1		\$87.00									
	6/23/2020 Healey, Christopher J.	Review updated disclosures and correspondence to team regarding same.	\$870	0.2		\$174.00									
	6/23/2020 Healey, Christopher J.	Review Sunrise motion regarding Interrogatories 20-21.	\$870	1.1		\$957.00									
	6/23/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding case status and to-do.	\$870	0.3		\$261.00									
	6/23/2020 Healey, Christopher J.	Prepare correspondence to team regarding potential response to Sunrise's motion to compel.	\$870	0.3		\$261.00									
	6/23/2020 Healey, Christopher J.	Draft supplemental responses to Interrogatories 20-21.	\$870	1		\$870.00									
	6/23/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.2		\$174.00									
	6/23/2020 Healey, Christopher J.	Prepare correspondence to team regarding additional plaintiffs.	\$870	0.2		\$174.00									
	6/23/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1		\$87.00									
	6/23/2020 Healey, Christopher J.	Outline to-do list.	\$870	0.2		\$174.00									
	6/23/2020 Healey, Christopher J.	Telephone conference with team regarding response to Sunrise's motion to compel regarding Interrogatories 20-21.	\$870	0.8		\$696.00				0.8	696.00				
	6/23/2020 Myrick, Tracy R.	Send additional follow-ups to the various volunteers working on the San Mateo Data extraction project.	\$195	0.7		\$136.50									
	6/23/2020 Myrick, Tracy R.	Review various San Mateo Assessment data to determine beginning bates number of each assessment.	\$195	3		\$585.00									
	6/24/2020 Healey, Christopher J.	Review and revise letter regarding data motion.	\$870	0.3		\$261.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	6/24/2020 Healey, Christopher J.	Correspondence with Attorney Johnson regarding same.	\$870	0.1		\$87.00								
	6/24/2020 Healey, Christopher J.	Draft correspondence regarding expert schedule.	\$870	0.1		\$87.00								
	6/24/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding Interrogatories 20-21 issues.	\$870	0.1		\$87.00								
	6/24/2020 Healey, Christopher J.	Correspondence with Pat Kennedy's office regarding deposition schedule.	\$870	0.1		\$87.00								
	6/24/2020 Healey, Christopher J.	Correspondence regarding Flores subpoena response.	\$870	0.1		\$87.00								
	6/24/2020 Healey, Christopher J.	Review correspondence regarding declarant depositions.	\$870	0.1		\$87.00								
	6/24/2020 Healey, Christopher J.	Correspondence with Tracy Myrick regarding data extraction project.	\$870	0.1		\$87.00								
	6/24/2020 Healey, Christopher J.	Review and respond regarding Gibson's position on Interrogatories 20-21 issue.	\$870	0.2		\$174.00								
	6/24/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding status.	\$870	0.1		\$87.00								
	6/24/2020 Healey, Christopher J.	Correspondence with Arns' office regarding Lacey/Ginder deposition.	\$870	0.4		\$348.00	0.4	348.00						
	6/24/2020 Healey, Christopher J.	Prepare correspondence to Arns' office regarding deposition exhibits.	\$870	0.2		\$174.00								
	6/24/2020 Healey, Christopher J.	Review deposition exhibit list.	\$870	0.1		\$87.00								
	6/24/2020 Healey, Christopher J.	Review Attorney Johnson's email regarding premature expert discovery.	\$870	0.1		\$87.00								
	6/24/2020 Healey, Christopher J.	Correspondence regarding follow-up research.	\$870	0.1		\$87.00								
	6/24/2020 Healey, Christopher J.	Prepare correspondence regarding deposition coverage.	\$870	0.1		\$87.00								
	6/24/2020 Healey, Christopher J.	Draft opposition insert to joint statement regarding Interrogatories 20-21.	\$870	2.2		\$1,914.00								
	6/24/2020 Healey, Christopher J.	Correspondence with Pat Kennedy's office regarding deposition scheduling.	\$870	0.2		\$174.00								
	6/24/2020 Healey, Christopher J.	Prepare correspondence to team regarding expert depositions.	\$870	0.2		\$174.00								
	6/24/2020 Healey, Christopher J.	Correspondence regarding premature expert discovery.	\$870	0.1		\$87.00								
	6/24/2020 Healey, Christopher J.	Correspondence regarding new potential plaintiffs.	\$870	0.1		\$87.00								
	6/24/2020 Healey, Christopher J.	Further drafting opposition to joint statement regarding Interrogatories 20-21.	\$870	0.8		\$696.00								
	6/24/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding deposition schedule.	\$870	0.1		\$87.00								
	6/24/2020 Myrick, Tracy R.	Review San Mateo data to determine bates number of each assessment and provide spreadsheet to caseteam.	\$195	2		\$390.00								
	6/24/2020 Myrick, Tracy R.	Send follow-up to various volunteers regarding status of San Mateo data extraction project.	\$195	0.7		\$136.50								
	6/24/2020 Myrick, Tracy R.	Work with data set to import into review database according to established specifications.	\$195	0.2		\$39.00								
	6/24/2020 Myrick, Tracy R.	Update search indexes as necessary and appropriate.	\$195	0.1		\$19.50								
	6/24/2020 Myrick, Tracy R.	Perform data validation steps and document all relevant details.	\$195	0.1		\$19.50								
	6/25/2020 Healey, Christopher J.	Review correspondence regarding Sunrise motion to compel regarding Interrogatories 20-21.	\$870	0.2		\$174.00								
	6/25/2020 Healey, Christopher J.	Draft opposition to motion to compel Interrogatories 20-21.	\$870	2		\$1,740.00								
	6/25/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.2		\$174.00								
	6/25/2020 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding Lacey/Ginder depositions.	\$870	0.1		\$87.00								
	6/25/2020 Healey, Christopher J.	Prepare correspondence to team regarding task time discovery.	\$870	0.2		\$174.00								
	6/25/2020 Healey, Christopher J.	Review Gibson letter regarding discovery stay.	\$870	0.1		\$87.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	6/25/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1									
	6/25/2020 Healey, Christopher J.	Prepare correspondence to team regarding expert deposition schedule.	\$870	0.1									
	6/25/2020 Healey, Christopher J.	Prepare correspondence to Attorney Yarnell regarding declarant depositions and schedule.	\$870	0.2		\$174.00							
	6/25/2020 Healey, Christopher J.	Further drafting regarding joint statement on Interrogatories 20-21.	\$870	0.1		\$87.00							
	6/25/2020 Healey, Christopher J.	Correspondence regarding expert schedule.	\$870	0.1		\$87.00							
	6/25/2020 Myrick, Tracy R.	Email communication with J. Carinio regarding status of San Mateo Data extraction project.	\$195	0.3		\$58.50							
	6/25/2020 Myrick, Tracy R.	Email communication with J. Thornton to obtain C. Sykes San Mateo shortened spreadsheet.	\$195	0.2		\$39.00							
	6/25/2020 Myrick, Tracy R.	Review spreadsheet and work on adding information for the missing assessment and provide to J. Thornton.	\$195	0.8		\$156.00							
	6/25/2020 Myrick, Tracy R.	Prepare and send update to C. Healey regarding status of San Mateo Data Extraction project.	\$195	0.2		\$39.00							
	6/26/2020 Healey, Christopher J.	Correspondence regarding data extraction project.	\$870	0.1		\$87.00							
	6/26/2020 Healey, Christopher J.	Review Sunrise document production (no. 24) and prepare correspondence to Attorney Umpierre regarding follow-up.	\$870	0.5		\$435.00							
	6/26/2020 Healey, Christopher J.	Prepare correspondence to Attorney Johnson regarding discovery stay letter from Sunrise.	\$870	0.2		\$174.00							
	6/26/2020 Healey, Christopher J.	Review Sunrise documents from Production 24.	\$870	1.3		\$1,131.00							
	6/26/2020 Healey, Christopher J.	Prepare to-do list.	\$870	0.1		\$87.00							
	6/26/2020 Healey, Christopher J.	Correspondence regarding data extraction project.	\$870	0.2		\$174.00							
	6/26/2020 Healey, Christopher J.	Continue reviewing Sunrise document production (no. 24).	\$870	0.2		\$174.00							
	6/26/2020 Healey, Christopher J.	Correspondence regarding Defendants' discovery motion.	\$870	0.1		\$87.00							
	6/26/2020 Healey, Christopher J.	Review Sunrise documents.	\$870	0.3		\$261.00							
	6/26/2020 Healey, Christopher J.	Correspondence regarding expert discovery schedule.	\$870	0.3		\$261.00							
	6/26/2020 Healey, Christopher J.	Review and revise objections to expert subpoenas.	\$870	0.5		\$435.00							
	6/26/2020 Healey, Christopher J.	Revise opposition regarding Interrogatories 20-21.	\$870	0.3		\$261.00							
	6/26/2020 Healey, Christopher J.	Telephone conference with Pat Kennedy's office regarding potential engagement.	\$870	0.1		\$87.00							
	6/26/2020 Healey, Christopher J.	Review protective order.	\$870	0.1		\$87.00							
	6/26/2020 Healey, Christopher J.	Prepare correspondence to Sunrise's counsel regarding same.	\$870	0.1		\$87.00							
	6/26/2020 Healey, Christopher J.	Review correspondence regarding Sunrise's position on data motion.	\$870	0.1		\$87.00							
	6/26/2020 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location, update production log regarding same.	\$195	0.7		\$136.50							
	6/26/2020 Myrick, Tracy R.	Capture data extraction for San Mateo files on the ADL focused template.	\$195	2		\$390.00							
	6/26/2020 Myrick, Tracy R.	Various communications with V. Newman regarding additional assessments needing data extraction performed.	\$195	0.5		\$97.50							
	6/26/2020 Myrick, Tracy R.	Work with data set to import into review database according to established specifications.	\$195	0.1		\$19.50							
	6/26/2020 Myrick, Tracy R.	Update search indexes as necessary and appropriate.	\$195	0.1		\$19.50							
	6/26/2020 Myrick, Tracy R.	Perform data validation steps and document all relevant details.	\$195	0.1		\$19.50							
	6/27/2020 Healey, Christopher J.	Outline reply brief regarding data motion.	\$870	0.3		\$261.00							
	6/27/2020 Healey, Christopher J.	Review Attorney Johnson's correspondence regarding Interrogatories 20-21 issue.	\$870	0.1		\$87.00							

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	6/27/2020 Myrick, Tracy R.	Continue to extract data from San Mateo files and transfer information to the ADL focused template.	\$195	1.8	\$351.00								
	6/28/2020 Healey, Christopher J.	Revise opposition regarding Interrogatories 20-21.	\$870	3.1	\$2,697.00	0.6	522.00						
	6/28/2020 Myrick, Tracy R.	Continue to extract data from San Mateo files and transfer information to the ADL focused template.	\$195	1	\$195.00								
	6/28/2020 Myrick, Tracy R.	Work on saving various data capture spreadsheets to iManage.	\$195	1	\$195.00								
	6/29/2020 Ryan, Teresa M.	Autocite plaintiff's cites in the joint statement re motion to compel interrogatories.	\$380	0.7	\$266.00	0.7	266						
	6/29/2020 Healey, Christopher J.	Revise opposition to Interrogatories 20-21.	\$870	1.9	\$1,653.00								
	6/29/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1	\$87.00								
	6/29/2020 Healey, Christopher J.	Review supplemental witness disclosure and prepare correspondence regarding same.	\$870	0.3	\$261.00								
	6/29/2020 Healey, Christopher J.	Review and comment on Umpierre declaration.	\$870	0.2	\$174.00								
	6/29/2020 Healey, Christopher J.	Review and comment on supplemental response to Interrogatories 20-21.	\$870	0.3	\$261.00								
	6/29/2020 Healey, Christopher J.	Correspondence regarding additional support for opposition to Interrogatories 20-21.	\$870	0.1	\$87.00								
	6/29/2020 Healey, Christopher J.	Revise brief regarding same.	\$870	0.3	\$261.00								
	6/29/2020 Healey, Christopher J.	Prepare for call regarding discovery meet and confer.	\$870	0.2	\$174.00								
	6/29/2020 Healey, Christopher J.	Outline reply regarding data motion.	\$870	0.3	\$261.00								
	6/29/2020 Healey, Christopher J.	Prepare correspondence to team regarding both.	\$870	0.2	\$174.00								
	6/29/2020 Healey, Christopher J.	Further revisions to Interrogatories 20-21 brief.	\$870	0.8	\$696.00								
	6/29/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.2	\$174.00								
	6/29/2020 Healey, Christopher J.	Telephone conference with team regarding discovery issues and meet and confer preparation.	\$870	0.7	\$609.00			0.7	609.00				
	6/29/2020 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding absent class member motion.	\$870	0.1	\$87.00								
	6/29/2020 Healey, Christopher J.	Correspondence with Attorney Stebner regarding additional plaintiffs.	\$870	0.1	\$87.00								
	6/29/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding same.	\$870	0.2	\$174.00								
	6/29/2020 Myrick, Tracy R.	Update San Mateo Data extraction spreadsheet showing volunteers assessments assigned to them and forward to caseteam.	\$195	0.5	\$97.50								
	6/30/2020 Ryan, Teresa M.	Retrieve and forward autocite case results re motion to compel to C. Healey.	\$380	0.4	\$152.00	0.4	152						
	6/30/2020 Healey, Christopher J.	Review opposition to Interrogatories 20-21 motion.	\$870	0.2	\$174.00								
	6/30/2020 Healey, Christopher J.	Prepare correspondence regarding to-do list on Interrogatories 20-21 motion.	\$870	0.1	\$87.00								
	6/30/2020 Healey, Christopher J.	Prepare correspondence regarding data motion filing.	\$870	0.1	\$87.00								
	6/30/2020 Healey, Christopher J.	Correspondence regarding Sunrise's request for additional information regarding Torrey Partners engagement.	\$870	0.1	\$87.00								
	6/30/2020 Healey, Christopher J.	Review correspondence regarding data extraction project and correspondence to Attorney Marks regarding same.	\$870	0.1	\$87.00								
	6/30/2020 Healey, Christopher J.	Review Attorney Gorman's correspondence regarding expert document production.	\$870	0.1	\$87.00								
	6/30/2020 Healey, Christopher J.	Review proposed revisions to opposition to Interrogatories 20-21 motion.	\$870	0.1	\$87.00								
	6/30/2020 Healey, Christopher J.	Review autocite report and revise opposition argument regarding Interrogatories 20-21.	\$870	0.3	\$261.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	6/30/2020 Healey, Christopher J.	Analysis regarding FRCP 26(b)(4)(B) rule and correspondence to team regarding same.	\$870	0.5		\$435.00									
	6/30/2020 Healey, Christopher J.	Final review of opposition statement regarding Interrogatories 20-	\$870	0.2		\$174.00									
	6/30/2020 Healey, Christopher J.	21 motion.	\$870	0.2		\$174.00									
	6/30/2020 Healey, Christopher J.	Review notice of motion regarding data production.	\$870	0.2		\$174.00									
	6/30/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding discovery meet and confer.	\$870	0.2		\$174.00									
	6/30/2020 Healey, Christopher J.	Follow-up call regarding same.	\$870	0.1		\$87.00									
	6/30/2020 Healey, Christopher J.	Outline reply regarding data motion.	\$870	1.8		\$1,566.00									
	6/30/2020 Healey, Christopher J.	Correspondence regarding open issues regarding same.	\$870	0.3		\$261.00									
	6/30/2020 Healey, Christopher J.	Telephone conference with Tracy Myrick regarding data assessment issues.	\$870	0.2		\$174.00									
	6/30/2020 Myrick, Tracy R.	Various Communications with L. Castro regarding spreadsheets showing San Mateo Data extraction; review L. Castro spreadsheets and save to iManage.	\$195	0.5		\$97.50									
	7/1/2020 Healey, Christopher J.	Review correspondence regarding potential new plaintiffs.	\$870	0.1		\$87.00									
	7/1/2020 Healey, Christopher J.	Response regarding same.	\$870	0.1		\$87.00									
	7/1/2020 Healey, Christopher J.	Prepare correspondence to team regarding potential approach regarding new plaintiffs.	\$870	0.3		\$261.00									
	7/1/2020 Healey, Christopher J.	Correspondence regarding potential new plaintiffs.	\$870	0.2		\$174.00									
	7/1/2020 Healey, Christopher J.	Review opposition to motion regarding above class member discovery.	\$870	0.3		\$261.00									
	7/1/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding potential additional plaintiffs and data motion.	\$870	0.2		\$174.00									
	7/1/2020 Healey, Christopher J.	Review correspondence regarding discovery issues.	\$870	0.1		\$87.00									
	7/1/2020 Healey, Christopher J.	Prepare for team call regarding new plaintiffs.	\$870	0.5		\$435.00									
	7/1/2020 Healey, Christopher J.	Telephone conference with team regarding new plaintiff issues.	\$870	1		\$870.00				1	870.00				
	7/1/2020 Healey, Christopher J.	Telephone conference with Attorney Johnson and Attorney Umpierre regarding discovery meet and confer and related issues.	\$870	0.5		\$435.00									
	7/1/2020 Healey, Christopher J.	Review draft responses to Kennedy subpoena.	\$870	0.3		\$261.00									
	7/1/2020 Healey, Christopher J.	Analysis regarding expert disclosure requirements.	\$870	1.3		\$1,131.00									
	7/1/2020 Healey, Christopher J.	Prepare correspondence regarding same.	\$870	0.5		\$435.00									
	7/1/2020 Healey, Christopher J.	Telephone conference with Lindsay Pettite (Pat Kennedy's office) regarding defendants' deposition subpoena.	\$870	0.7		\$609.00									
	7/1/2020 Healey, Christopher J.	Telephone conferences with Attorney Umpierre regarding expert disclosure issues.	\$870	0.5		\$435.00									
	7/1/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding class member discovery motion.	\$870	0.5		\$435.00									
	7/2/2020 Healey, Christopher J.	Correspondence regarding expert production and depositions.	\$870	0.1		\$87.00									
	7/2/2020 Healey, Christopher J.	Analysis regarding data motion.	\$870	0.2		\$174.00									
	7/2/2020 Healey, Christopher J.	Conference regarding research to support reply on data motion.	\$870	0.1		\$87.00									
	7/2/2020 Healey, Christopher J.	Review and revise Kennedy deposition subpoena.	\$870	0.3		\$261.00									
	7/2/2020 Healey, Christopher J.	Research and analysis regarding reply brief on data motion.	\$870	1.2		\$1,044.00									
	7/2/2020 Healey, Christopher J.	Review and revise letter regarding declarant resident file.	\$870	0.7		\$609.00									
	7/2/2020 Healey, Christopher J.	Review and revise Torrey Partners conflict disclosure.	\$870	0.3		\$261.00									
	7/2/2020 Healey, Christopher J.	Prepare correspondence to Gibson firm regarding same.	\$870	0.1		\$87.00									
	7/2/2020 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding data motion.	\$870	0.1		\$87.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/2/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding absent class member motion.	\$870	0.2		\$174.00									
	7/2/2020 Healey, Christopher J.	Review and respond to Gibson firm's request regarding Interrogatories 20-21 motion.	\$870	0.1		\$87.00									
	7/2/2020 Healey, Christopher J.	Outline response to Interrogatories 20-21 motion.	\$870	0.2		\$174.00									
	7/2/2020 Healey, Christopher J.	Review and revise supplemental response regarding Interrogatories 20-21.	\$870	0.2		\$174.00									
	7/2/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.2		\$174.00									
	7/2/2020 Healey, Christopher J.	Revise opposition to motion regarding class member documentation.	\$870	4.3		\$3,741.00									
	7/2/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$870	0.2		\$174.00									
	7/2/2020 Healey, Christopher J.	Prepare correspondence to Kennedy's office regarding potential Torrey Partners' engagement.	\$870	0.1		\$87.00									
	7/2/2020 Valero, Carmen A.	Research CA Federal cases re: (1) production of HIPPA protected info subject to a protective order; and (2) requirement for producing party to meet/confer on the form of data production for C. Healey.	\$360	2		\$720.00									
	7/3/2020 Healey, Christopher J.	Review cases regarding ESI meet and confer requirements.	\$870	2.1		\$1,827.00	1.5	1,305.00							
	7/3/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding state law privilege issue.	\$870	0.3		\$261.00									
	7/3/2020 Healey, Christopher J.	Draft reply regarding data motion.	\$870	2.3		\$2,001.00	1	870.00							
	7/4/2020 Healey, Christopher J.	Draft reply regarding data motion.	\$870	3.7		\$3,219.00	1	870.00							
	7/5/2020 Healey, Christopher J.	Further drafting reply on data motion.	\$870	2.1		\$1,827.00	1	870.00							
	7/5/2020 Healey, Christopher J.	Prepare correspondence to team regarding proposed approach on data motion.	\$870	0.3		\$261.00									
	7/6/2020 Healey, Christopher J.	Prepare correspondence to Attorneys Wallace and Warren regarding Kennedy deposition.	\$870	0.2		\$174.00									
	7/6/2020 Healey, Christopher J.	Prepare correspondence to Gibson firm regarding Torrey Partners inquiry.	\$870	0.1		\$87.00									
	7/6/2020 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding data motion.	\$870	0.2		\$174.00									
	7/6/2020 Healey, Christopher J.	Correspondence with Torrey Partners regarding Silvergate inquiry.	\$870	0.1		\$87.00									
	7/6/2020 Healey, Christopher J.	Prepare to-do list.	\$870	0.2		\$174.00									
	7/6/2020 Healey, Christopher J.	Prepare correspondence to Gibson firm regarding Silvergate inquiry.	\$870	0.3		\$261.00									
	7/6/2020 Healey, Christopher J.	Review and report to Attorney Marks' inquiry regarding ProModel deposition.	\$870	0.5		\$435.00									
	7/6/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding supplemental responses to Interrogatories 20-21.	\$870	0.2		\$174.00									
	7/6/2020 Healey, Christopher J.	Review and respond regarding opposition to class member records.	\$870	0.3		\$261.00									
	7/6/2020 Valero, Carmen A.	Research CA federal court cases addressing a request to stay discovery pending a ruling on a class certification motion, for C. Healey.	\$360	1		\$360.00									
	7/7/2020 Healey, Christopher J.	Correspondence regarding discovery issues.	\$870	0.1		\$87.00									
	7/7/2020 Healey, Christopher J.	Prepare correspondence regarding data motion.	\$870	0.1		\$87.00									
	7/7/2020 Healey, Christopher J.	Review and comment regarding proposed stipulation.	\$870	0.2		\$174.00									
	7/7/2020 Healey, Christopher J.	Prepare for Pat Kennedy deposition preparation.	\$870	0.2		\$174.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	7/7/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding same.	\$870	0.2									
	7/7/2020 Healey, Christopher J.	Prepare correspondence to Pat Kennedy regarding same.	\$870	0.1									
	7/7/2020 Healey, Christopher J.	Review correspondence regarding discovery responses.	\$870	0.2									
	7/7/2020 Healey, Christopher J.	Prepare correspondence regarding proposed extension.	\$870	0.1									
	7/7/2020 Healey, Christopher J.	Review and respond to class member document motion.	\$870	0.1									
	7/8/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding preparation call.	\$870	0.1									
	7/8/2020 Healey, Christopher J.	Review correspondence from Gibson firm regarding discovery motion.	\$870	0.1									
	7/8/2020 Healey, Christopher J.	Prepare for Kennedy meeting.	\$870	0.5									
	7/8/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Flores analysis.	\$870	0.3									
	7/8/2020 Healey, Christopher J.	Correspondence regarding data motion hearing.	\$870	0.2									
	7/8/2020 Healey, Christopher J.	Correspondence regarding Ginder/Lacey depositions.	\$870	0.2									
	7/8/2020 Healey, Christopher J.	Correspondence regarding discovery motions.	\$870	0.2									
	7/8/2020 Healey, Christopher J.	Prepare correspondence to team regarding ESI.	\$870	0.2									
	7/8/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Flores permutation analysis.	\$870	0.2									
	7/8/2020 Healey, Christopher J.	Telephone conference with Pat Kennedy regarding deposition preparation.	\$870	1									
	7/8/2020 Healey, Christopher J.	Prepare correspondence regarding Flores declaration.	\$870	0.1									
	7/8/2020 Healey, Christopher J.	Review and respond regarding Gibson declaration on briefing schedule.	\$870	0.2									
	7/8/2020 Healey, Christopher J.	Prepare correspondence regarding discovery call.	\$870	0.2									
	7/8/2020 Healey, Christopher J.	Prepare correspondence regarding declarant deposition preparation.	\$870	0.1									
	7/8/2020 Healey, Christopher J.	Telephone conference with Attorney Cocchia regarding data reply brief.	\$870	0.2									
	7/8/2020 Healey, Christopher J.	Correspondence regarding Gibson Firm's request regarding deposition exhibits.	\$870	0.1									
	7/8/2020 Healey, Christopher J.	Review correspondence regarding discovery issues.	\$870	0.1									
	7/9/2020 Healey, Christopher J.	Review correspondence regarding depositions.	\$870	0.2									
	7/9/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Dale Schroyer declaration.	\$870	0.2									
	7/9/2020 Healey, Christopher J.	Review and revise draft supplemental brief regarding Interrogatories 20-21.	\$870	0.2									
	7/9/2020 Healey, Christopher J.	Correspondence regarding Kennedy deposition preparation and mailing addresses.	\$870	0.2									
	7/9/2020 Healey, Christopher J.	Correspondence regarding protective order.	\$870	0.2									
	7/9/2020 Healey, Christopher J.	Prepare correspondence to team regarding strategy conference call and draft agenda.	\$870	0.3									
	7/9/2020 Healey, Christopher J.	Review ProModel presentation.	\$870	0.1									
	7/9/2020 Healey, Christopher J.	Prepare for Patrick Kennedy deposition.	\$870	0.2									
	7/9/2020 Healey, Christopher J.	Draft request for admission and prepare correspondence regarding same.	\$870	0.3									
	7/9/2020 Healey, Christopher J.	Review discovery stay cases.	\$870	0.2									
	7/9/2020 Healey, Christopher J.	Prepare correspondence regarding key documents from Production 24.	\$870	0.4									
	7/9/2020 Healey, Christopher J.	Revise reply brief regarding data motion.	\$870	1.2									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	7/9/2020 Healey, Christopher J.	Prepare correspondence regarding discovery motions.	\$870	0.1									
	7/9/2020 Healey, Christopher J.	Correspondence regarding data motion - form of order.	\$870	0.2									
	7/9/2020 Healey, Christopher J.	Correspondence regarding Stebner declaration.	\$870	0.1									
	7/9/2020 Healey, Christopher J.	Prepare correspondence to team regarding redaction issues on data motion.	\$870	0.5									
	7/9/2020 Myrick, Tracy R.	Export various Defendant production documents from workspace and provide to caseteam.	\$195	0.7									
	7/10/2020 Healey, Christopher J.	Correspondence regarding Pat Kennedy deposition.	\$870	0.1									
	7/10/2020 Healey, Christopher J.	Correspondence with Pat Kennedy's office regarding deposition logistics.	\$870	0.2									
	7/10/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$870	0.1									
	7/10/2020 Healey, Christopher J.	Review article regarding expert deposition.	\$870	0.2									
	7/10/2020 Healey, Christopher J.	Prepare for Pat Kennedy deposition.	\$870	0.5									
	7/10/2020 Healey, Christopher J.	Revise data motion reply brief.	\$870	1.5									
	7/10/2020 Healey, Christopher J.	Correspondence with Attorney Johnson regarding same.	\$870	0.1									
	7/10/2020 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding expert deposition.	\$870	0.2									
	7/10/2020 Healey, Christopher J.	Prepare correspondence to team regarding key documents from Sunrise production 24.	\$870	0.5									
	7/10/2020 Healey, Christopher J.	Review Judge Early's order regarding discovery referee.	\$870	0.2									
	7/10/2020 Healey, Christopher J.	Prepare correspondence to Dentons' team regarding potential referee candidates.	\$870	0.2									
	7/10/2020 Healey, Christopher J.	Correspondence with team regarding same.	\$870	0.1									
	7/10/2020 Healey, Christopher J.	Review Sunrise's objections to Request for Production, Set Six.	\$870	0.7									
	7/10/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.2									
	7/10/2020 Healey, Christopher J.	Prepare correspondence regarding Rule 53 disclosure referee issues.	\$870	0.1									
	7/10/2020 Healey, Christopher J.	Research regarding Rule 53.	\$870	0.1									
	7/10/2020 Healey, Christopher J.	Outline response regarding discovery referee issue.	\$870	0.2									
	7/10/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.2									
	7/10/2020 Healey, Christopher J.	Review Gibson firm's demand regarding Pat Kennedy production.	\$870	0.1									
	7/10/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1									
	7/10/2020 Valero, Carmen A.	Research CACD cases and filings re appointment of discovery master under FRCP 53, for C. Healey.	\$360	1									
	7/12/2020 Healey, Christopher J.	Review cases regarding discovery referee appointment.	\$870	0.2									
	7/12/2020 Healey, Christopher J.	Outline brief regarding discovery referee appointment.	\$870	0.5									
	7/13/2020 Healey, Christopher J.	Review Pat Kennedy exhibits.	\$870	0.7									
	7/13/2020 Healey, Christopher J.	Prepare correspondence to Attorney Barnes regarding discovery referee.	\$870	0.1									
	7/13/2020 Healey, Christopher J.	Prepare correspondence to Attorney Swift regarding discovery referee.	\$870	0.1									
	7/13/2020 Healey, Christopher J.	Correspondence with Pat Kennedy regarding deposition preparation.	\$870	0.1									
	7/13/2020 Healey, Christopher J.	Prepare for team call.	\$870	0.2									
	7/13/2020 Healey, Christopher J.	Telephone conference with team regarding discovery and status.	\$870	1									
	7/13/2020 Healey, Christopher J.	Prepare correspondence to Foss regarding Lacey deposition.	\$870	0.1		0.1	87.00						
	7/13/2020 Healey, Christopher J.	Prepare for Pat Kennedy deposition.	\$870	0.5									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/13/2020 Healey, Christopher J.	Telephone conference with Pat Kennedy regarding deposition preparation.	\$870	0.8		\$696.00								
	7/13/2020 Healey, Christopher J.	Prepare correspondence regarding research on adding new parties.	\$870	0.2		\$174.00								
	7/13/2020 Healey, Christopher J.	Review letter regarding declarant depositions.	\$870	0.1		\$87.00								
	7/13/2020 Healey, Christopher J.	Review and revise Attorney Johnson's declaration regarding data motion.	\$870	0.2		\$174.00								
	7/13/2020 Healey, Christopher J.	Telephone conferences regarding potential discovery referees.	\$870	0.2		\$174.00								
	7/13/2020 Healey, Christopher J.	Analyses regarding potential motion to add new plaintiffs and prepare correspondence to team regarding same.	\$870	2.2		\$1,914.00								
	7/13/2020 Healey, Christopher J.	Review Attorney Johnson's correspondence regarding representing declarants.	\$870	0.1		\$87.00								
	7/14/2020 Healey, Christopher J.	Prepare correspondence regarding Pat Kennedy deposition and document review.	\$870	0.1		\$87.00								
	7/14/2020 Healey, Christopher J.	Prepare correspondence regarding ADR scheduling.	\$870	0.1		\$87.00								
	7/14/2020 Healey, Christopher J.	Prepare correspondence regarding declarants' resident files.	\$870	0.1		\$87.00								
	7/14/2020 Healey, Christopher J.	Review Pat Kennedy deposition exhibits.	\$870	0.7		\$609.00								
	7/14/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$870	0.5		\$435.00								
	7/14/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding deposition exhibit issues.	\$870	0.2		\$174.00								
	7/14/2020 Healey, Christopher J.	Review Sunrise Resident Agreements chart.	\$870	0.1		\$87.00								
	7/14/2020 Healey, Christopher J.	Draft letter regarding proposed schedule for leave to amend motion.	\$870	0.5		\$435.00								
	7/14/2020 Healey, Christopher J.	Correspondence regarding discovery referees.	\$870	0.1		\$87.00								
	7/14/2020 Healey, Christopher J.	Review letter regarding ESI document production.	\$870	0.1		\$87.00								
	7/14/2020 Healey, Christopher J.	Correspondence regarding research on leave to amend.	\$870	0.2		\$174.00								
	7/14/2020 Healey, Christopher J.	Prepare correspondence to team regarding leave to amend issue.	\$870	0.1		\$87.00								
	7/14/2020 Healey, Christopher J.	Review discovery referee candidates.	\$870	0.6		\$522.00								
	7/14/2020 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding discovery referee candidates.	\$870	0.2		\$174.00								
	7/14/2020 Healey, Christopher J.	Telephone conference with potential discovery referee candidate.	\$870	0.1		\$87.00								
	7/14/2020 Healey, Christopher J.	Correspondence with JAMS regarding discovery referee candidates.	\$870	0.2		\$174.00								
	7/14/2020 Healey, Christopher J.	Follow-up correspondence with discovery referee candidates.	\$870	0.3		\$261.00								
	7/14/2020 Healey, Christopher J.	Draft position statement regarding discovery referee.	\$870	0.2		\$174.00								
	7/14/2020 Healey, Christopher J.	Prepare correspondence to team regarding FRCP 53 and discovery re	\$870	1.8		\$1,566.00								
	7/14/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.2		\$174.00								
	7/14/2020 Healey, Christopher J.	Correspondence regarding discovery status.	\$870	0.1		\$87.00								
	7/14/2020 Healey, Christopher J.	Review briefs regarding leave to amend issue.	\$870	0.2		\$174.00								
	7/15/2020 Healey, Christopher J.	Correspondence regarding Sunrise "discretion" defenses.	\$870	0.1		\$87.00								
	7/15/2020 Healey, Christopher J.	Correspondence regarding potential discovery referee.	\$870	0.2		\$174.00								
	7/15/2020 Healey, Christopher J.	Outline potential reply arguments for class certification motion.	\$870	0.5		\$435.00								
	7/15/2020 Healey, Christopher J.	Prepare correspondence to team regarding discovery referees.	\$870	0.2		\$174.00								
	7/15/2020 Healey, Christopher J.	Telephone conference with mediator Rob Kaplan regarding case status.	\$870	0.2		\$174.00								
	7/15/2020 Healey, Christopher J.	Draft position statement regarding discovery referees.	\$870	0.2		\$174.00								
	7/15/2020 Healey, Christopher J.	Draft letter regarding mediation.	\$870	0.3		\$261.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/15/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding staffing analysis.	\$870	0.3		\$261.00									
	7/15/2020 Healey, Christopher J.	Prepare correspondence regarding Sunrise discretion defense.	\$870	0.1		\$87.00									
	7/15/2020 Healey, Christopher J.	Review correspondence.	\$870	0.4		\$348.00									
	7/15/2020 Healey, Christopher J.	Telephone conference with team regarding discovery referee issues.	\$870	0.1		\$87.00				0.1	87.00				
	7/15/2020 Healey, Christopher J.	Correspondence regarding deposition transcript.	\$870	0.1		\$87.00									
	7/15/2020 Healey, Christopher J.	Revise letter regarding mediation date.	\$870	0.2		\$174.00									
	7/15/2020 Healey, Christopher J.	Correspondence to team regarding position statement.	\$870	0.2		\$174.00									
	7/15/2020 Healey, Christopher J.	Revise position statement.	\$870	0.2		\$174.00									
	7/15/2020 Healey, Christopher J.	Prepare correspondence regarding motion for leave to amend.	\$870	0.1		\$87.00									
	7/15/2020 Healey, Christopher J.	Review updated research regarding amendment.	\$870	0.2		\$174.00									
	7/15/2020 Healey, Christopher J.	Prepare correspondence regarding class certification schedule.	\$870	0.2		\$174.00									
	7/15/2020 Healey, Christopher J.	Review comments to discovery referee statement.	\$870	0.2		\$174.00									
	7/15/2020 Healey, Christopher J.	Prepare correspondence regarding revised brief.	\$870	0.2		\$174.00									
	7/15/2020 Valero, Carmen A.	Research and retrieve CACD cases where leave to amend was granted though deadline was a substantial time before, for C. Healey.	\$360	1		\$360.00									
	7/16/2020 Healey, Christopher J.	Review and respond to correspondence regarding ex parte to continue case schedule.	\$870	0.2		\$174.00									
	7/16/2020 Healey, Christopher J.	Review correspondence regarding discovery referee issues.	\$870	0.1		\$87.00									
	7/16/2020 Healey, Christopher J.	Revise position statement regarding discovery referee.	\$870	1.2		\$1,044.00									
	7/16/2020 Healey, Christopher J.	Correspondence regarding Flores exhibits.	\$870	0.1		\$87.00									
	7/16/2020 Healey, Christopher J.	Review defendants' ex parte application and outline response.	\$870	0.2		\$174.00									
	7/16/2020 Healey, Christopher J.	Prepare correspondence to team regarding response points on ex parte.	\$870	0.7		\$609.00									
	7/16/2020 Healey, Christopher J.	Telephone conference with Attorney Johnson regarding same.	\$870	0.2		\$174.00									
	7/16/2020 Healey, Christopher J.	Revise position statement regarding discovery referee.	\$870	0.2		\$174.00									
	7/16/2020 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding discovery subpoenas.	\$870	0.1		\$87.00									
	7/16/2020 Healey, Christopher J.	Correspondence regarding record release issue.	\$870	0.1		\$87.00									
	7/16/2020 Healey, Christopher J.	Prepare correspondence regarding leave to amend proposal.	\$870	0.1		\$87.00									
	7/17/2020 Healey, Christopher J.	Review correspondence with Gibson firm regarding statements made in Position Statement on Discovery Master.	\$870	0.2		\$174.00									
	7/17/2020 Healey, Christopher J.	Review and revise ex parte opposition.	\$870	2.2		\$1,914.00									
	7/17/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00									
	7/17/2020 Healey, Christopher J.	Correspondence with Attorney Thamer regarding mediation and case status.	\$870	0.1		\$87.00									
	7/17/2020 Healey, Christopher J.	Review court order denying ex parte application.	\$870	0.1		\$87.00									
	7/17/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00									
	7/17/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding amendment issue and document requests.	\$870	0.2		\$174.00									
	7/17/2020 Healey, Christopher J.	Review and comment regarding Wallace revisions to opposition brief.	\$870	0.1		\$87.00									
	7/17/2020 Healey, Christopher J.	Response to Attorney Johnson's expert discovery deadline issue.	\$870	0.1		\$87.00									
	7/17/2020 Healey, Christopher J.	Prepare correspondence to team regarding facility discovery issue.	\$870	0.2		\$174.00									
	7/17/2020 Healey, Christopher J.	Review and respond to letter regarding leave to amend.	\$870	0.1		\$87.00									

	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>	
<u>Fees</u>						Hrs	Fees	Hrs	Fees	Hrs	Fees
	7/17/2020 Healey, Christopher J.	Prepare correspondence regarding arbitration discovery issues.	\$870	0.2							
	7/17/2020 Healey, Christopher J.	Review and comment regarding ex parte opposition brief.	\$870	0.1	\$87.00						
	7/17/2020 Healey, Christopher J.	Draft request for admissions/interrogatories.	\$870	1.5	\$1,305.00						
	7/17/2020 Healey, Christopher J.	Review Sunrise response to arbitration document request and prepare correspondence to Attorney Warren regarding same.	\$870	0.1	\$87.00						
	7/17/2020 Healey, Christopher J.	Telephone conference with Attorney Warren regarding meet and confer approach.	\$870	0.1	\$87.00						
	7/17/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding PointClickCare subpoena.	\$870	0.1	\$87.00						
	7/17/2020 Healey, Christopher J.	Correspondence regarding discovery meet and confer.	\$870	0.1	\$87.00						
	7/18/2020 Healey, Christopher J.	Review and comment on discovery meet and confer letter as to sixth request for production of documents.	\$870	1.4	\$1,218.00						
	7/18/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding case status.	\$870	0.1	\$87.00						
	7/19/2020 Healey, Christopher J.	Review and comment on Defendants' stipulation regarding briefing extension.	\$870	0.5	\$435.00						
	7/19/2020 Healey, Christopher J.	Revise stipulation.	\$870	0.2	\$174.00						
	7/20/2020 Healey, Christopher J.	Review Gibson's request for stipulation and proposed depositions.	\$870	0.1	\$87.00						
	7/20/2020 Healey, Christopher J.	Prepare correspondence regarding declarant depositions.	\$870	0.2	\$174.00						
	7/20/2020 Healey, Christopher J.	Review order regarding Interrogatories 20-21 motion.	\$870	0.2	\$174.00						
	7/20/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.2	\$174.00						
	7/20/2020 Healey, Christopher J.	Review and comment on revised stipulation.	\$870	0.3	\$261.00						
	7/20/2020 Healey, Christopher J.	Prepare correspondence to team regarding data motion issues.	\$870	0.3	\$261.00						
	7/20/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding time study information and Flores deposition.	\$870	0.2	\$174.00						
	7/20/2020 Healey, Christopher J.	Prepare correspondence to team regarding Sunrise discovery position.	\$870	0.1	\$87.00						
	7/20/2020 Healey, Christopher J.	Analysis regarding sanctions request.	\$870	0.6	\$522.00						
	7/20/2020 Healey, Christopher J.	Correspondence regarding Flores timeline.	\$870	0.1	\$87.00						
	7/20/2020 Healey, Christopher J.	Review correspondence.	\$870	0.1	\$87.00						
	7/20/2020 Healey, Christopher J.	Telephone conference with Attorneys Marks and Thornton regarding data motion issues.	\$870	0.5	\$435.00						
	7/20/2020 Healey, Christopher J.	Correspondence regarding court reporter.	\$870	0.2	\$174.00	0.2	174.00				
	7/20/2020 Healey, Christopher J.	Correspondence regarding preparation for data call.	\$870	0.3	\$261.00						
	7/20/2020 Healey, Christopher J.	Review arbitration inserts and revise same.	\$870	0.3	\$261.00						
	7/20/2020 Healey, Christopher J.	Research regarding sanctions issues.	\$870	0.2	\$174.00						
	7/20/2020 Healey, Christopher J.	Review and revise correspondence regarding telephonic meet and confer.	\$870	0.1	\$87.00						
	7/20/2020 Healey, Christopher J.	Prepare correspondence to team regarding data motion call.	\$870	0.2	\$174.00						
	7/20/2020 Healey, Christopher J.	Review discovery master appointment.	\$870	0.2	\$174.00						
	7/20/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.3	\$261.00						
	7/20/2020 Healey, Christopher J.	Outline declaration regarding sanctions request on data motion.	\$870	0.5	\$435.00						
	7/20/2020 Healey, Christopher J.	Review and comment on meet and confer letter regarding Set Six Request for Production of Documents.	\$870	0.2	\$174.00						
	7/20/2020 Healey, Christopher J.	Review new Ninth Circuit decision regarding predominance.	\$870	0.1	\$87.00						
	7/20/2020 Myrick, Tracy R.	Upload P. Kennedy draft deposition files to share drive and provide caseteam link to location.	\$195	0.1	\$19.50						

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/21/2020 Healey, Christopher J.	Review and comment on letter regarding data motion technical meeting.	\$870	0.1		\$87.00									
	7/21/2020 Healey, Christopher J.	Draft correspondence to Gibson firm regarding case schedule stipulation.	\$870	0.4		\$348.00									
	7/21/2020 Healey, Christopher J.	Prepare correspondence to team regarding supplemental responses to Interrogatories 20-21.	\$870	0.2		\$174.00									
	7/21/2020 Healey, Christopher J.	Correspondence regarding technical call on data motion.	\$870	0.2		\$174.00									
	7/21/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1		\$87.00									
	7/21/2020 Healey, Christopher J.	Review and summarize time records to support sanctions argument.	\$870	0.2		\$174.00									
	7/21/2020 Healey, Christopher J.	Follow-up correspondence regarding data expert.	\$870	0.1		\$87.00									
	7/21/2020 Healey, Christopher J.	Prepare correspondence regarding supplemental brief on class member documents.	\$870	0.1		\$87.00									
	7/21/2020 Healey, Christopher J.	Correspondence regarding technical call regarding data motion.	\$870	0.2		\$174.00									
	7/21/2020 Healey, Christopher J.	Outline argument regarding sanctions request.	\$870	0.2		\$174.00									
	7/21/2020 Healey, Christopher J.	Correspondence regarding expert support for data motion.	\$870	0.3		\$261.00									
	7/21/2020 Healey, Christopher J.	Draft Healey declaration regarding sanctions request.	\$870	1		\$870.00									
	7/21/2020 Healey, Christopher J.	Review Sunrise's revisions to case scheduling stipulation.	\$870	0.2		\$174.00									
	7/21/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00									
	7/21/2020 Healey, Christopher J.	Telephone conference with team regarding same.	\$870	0.1		\$87.00				0.1	87.00				
	7/21/2020 Healey, Christopher J.	Telephone conference with team regarding preparation for technical call.	\$870	0.5		\$435.00				0.5	435.00				
	7/21/2020 Healey, Christopher J.	Correspondence regarding support for sanctions request.	\$870	0.8		\$696.00									
	7/21/2020 Healey, Christopher J.	Revise supplemental brief.	\$870	2.2		\$1,914.00									
	7/21/2020 Healey, Christopher J.	Prepare correspondence to team regarding draft brief and meet and confer call.	\$870	0.1		\$87.00									
	7/21/2020 Healey, Christopher J.	Draft proposed response regarding case stipulation.	\$870	0.1		\$87.00									
	7/21/2020 Healey, Christopher J.	Review and comment on question list for tech interview.	\$870	0.1		\$87.00									
	7/21/2020 Healey, Christopher J.	Prepare correspondence to team regarding case schedule stipulation/order.	\$870	0.1		\$87.00									
	7/21/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1		\$87.00									
	7/22/2020 Healey, Christopher J.	Review and comment on Attorney Johnson declaration.	\$870	0.2		\$174.00									
	7/22/2020 Healey, Christopher J.	Follow-up correspondence regarding data motion brief.	\$870	0.1		\$87.00									
	7/22/2020 Healey, Christopher J.	Prepare correspondence regarding case schedule stipulation.	\$870	0.2		\$174.00									
	7/22/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.2		\$174.00									
	7/22/2020 Healey, Christopher J.	Revise supplemental brief regarding sanctions request.	\$870	1		\$870.00									
	7/22/2020 Healey, Christopher J.	Review and comment regarding draft supplemental brief regarding class member documents.	\$870	0.2		\$174.00									
	7/22/2020 Healey, Christopher J.	Further revisions to supplemental brief.	\$870	0.2		\$174.00									
	7/22/2020 Healey, Christopher J.	Review Hollinger decision.	\$870	0.1		\$87.00									
	7/22/2020 Healey, Christopher J.	Telephone conference with team regarding technical meet and confer.	\$870	0.5		\$435.00				0.5	435.00				
	7/22/2020 Healey, Christopher J.	Telephone conference with Attorneys Johnson and Umpierre regarding data motion meet and confer.	\$870	0.5		\$435.00									
	7/22/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding class member document issues.	\$870	0.2		\$174.00									
	7/22/2020 Healey, Christopher J.	Research regarding HIPPA privacy issues.	\$870	0.5		\$435.00									
	7/22/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.5		\$435.00									
	7/22/2020 Healey, Christopher J.	Review cases regarding HIPPA privacy issues.	\$870	0.3		\$261.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	7/22/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding Edna's Place/Terrace Club staffing.	\$870	0.3									
	7/22/2020 Healey, Christopher J.	Prepare correspondence to Tracy Myrick regarding relativity search.	\$870	0.1	\$87.00								
	7/22/2020 Healey, Christopher J.	Prepare correspondence regarding supplemental brief regarding putative class member documents.	\$870	0.1	\$87.00								
	7/22/2020 Healey, Christopher J.	Correspondence regarding 2016 Budget Assumption document.	\$870	0.1	\$87.00								
	7/22/2020 Healey, Christopher J.	Review and revise supplemental brief regarding class member documents.	\$870	0.5	\$435.00								
	7/22/2020 Healey, Christopher J.	Telephone conference with Attorney Johnson regarding meet and confer regarding data production.	\$870	0.3	\$261.00								
	7/22/2020 Healey, Christopher J.	Review report regarding data production.	\$870	0.2	\$174.00								
	7/22/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.5	\$435.00								
	7/22/2020 Healey, Christopher J.	Revise supplemental brief regarding data production issues.	\$870	1.8	\$1,566.00								
	7/22/2020 Myrick, Tracy R.	Upload Meet and Confer draft transcripts to shared drive and provide caseteam with link to location.	\$195	0.1	\$19.50								
	7/22/2020 Myrick, Tracy R.	Upload L. Dale Schroyer deposition transcript to shared drive, provide link to caseteam and update deposition log.	\$195	0.4	\$78.00								
	7/22/2020 Myrick, Tracy R.	Prepare save search containing files regarding Terrace Club/Edna Place hours.	\$195	0.3	\$58.50								
	7/22/2020 Myrick, Tracy R.	Provide files relating to Terrace Club/Edna Place Hours via Accellion to D. Marks and his team.	\$195	0.5	\$97.50								
	7/22/2020 Valero, Carmen A.	Conduct CACD case research on two discovery sanctions issues under FRCP 37(a)(5) and 37(b)(2), for C. Healey.	\$360	0.5	\$180.00								
	7/23/2020 Healey, Christopher J.	Final review of supplemental brief regarding data motion.	\$870	0.3	\$261.00								
	7/23/2020 Healey, Christopher J.	Review Sunrise's proposal regarding data.	\$870	0.1	\$87.00								
	7/23/2020 Healey, Christopher J.	Review Attorneys Johnson and Umpierre's comments regarding same.	\$870	0.1	\$87.00								
	7/23/2020 Healey, Christopher J.	Review correspondence regarding California law on redaction issue.	\$870	0.1	\$87.00								
	7/23/2020 Healey, Christopher J.	Analysis regarding Sunrise's redaction position.	\$870	0.7	\$609.00								
	7/23/2020 Healey, Christopher J.	Revise response to Gibson Firm regarding assessment data proposal.	\$870	0.2	\$174.00								
	7/23/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.2	\$174.00								
	7/23/2020 Healey, Christopher J.	Revise supplemental brief.	\$870	1	\$870.00								
	7/23/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1	\$87.00								
	7/23/2020 Healey, Christopher J.	Review and follow-up messages regarding class member documents motion.	\$870	0.1	\$87.00								
	7/23/2020 Healey, Christopher J.	Telephone conference with Attorney Johnson regarding data motion negotiations.	\$870	0.2	\$174.00								
	7/23/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1	\$87.00								
	7/23/2020 Healey, Christopher J.	Revise supplemental brief regarding data motion.	\$870	3.9	\$3,393.00								
	7/23/2020 Healey, Christopher J.	Review and revise Johnson declaration.	\$870	0.3	\$261.00								
	7/23/2020 Healey, Christopher J.	Correspondence regarding same.	\$870	0.3	\$261.00								
	7/23/2020 Myrick, Tracy R.	Upload final version of Meet and Confer transcripts and send caseteam link to location.	\$195	0.1	\$19.50								
	7/23/2020 Myrick, Tracy R.	Upload exhibit to meet and confer transcript and provide caseteam with link to location.	\$195	0.2	\$39.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>			
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/23/2020 Myrick, Tracy R.	Upload exhibits to Schroyer deposition and provide caseteam with link to location.	\$195	0.5		\$97.50								
	7/23/2020 Myrick, Tracy R.	Download L. Schroyer video to deposition and provide caseteam with link to location.	\$195	0.5		\$97.50								
	7/23/2020 Myrick, Tracy R.	Import Schroyer transcript into Casenotebook and link exhibits and video.	\$195	0.5		\$97.50								
	7/23/2020 Myrick, Tracy R.	Download Defendant production and provide caseteam with link to location.	\$195	0.5		\$97.50								
	7/24/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Flores deposition.	\$870	0.3		\$261.00								
	7/24/2020 Healey, Christopher J.	Review Attorney Wallace's summary of key questions for Flores.	\$870	0.1		\$87.00								
	7/24/2020 Healey, Christopher J.	Respond to Attorney Wallace's correspondence regarding facility discretion.	\$870	0.1		\$87.00								
	7/24/2020 Healey, Christopher J.	Follow-up correspondence to Attorney Marks regarding corporate control issues.	\$870	0.1		\$87.00								
	7/24/2020 Healey, Christopher J.	Further telephone conference with Attorney Marks regarding Flores deposition.	\$870	0.2		\$174.00								
	7/24/2020 Healey, Christopher J.	Correspondence regarding discretion issue.	\$870	0.2		\$174.00								
	7/24/2020 Healey, Christopher J.	Review Sunrise's supplemental brief regarding data motion.	\$870	0.1		\$87.00								
	7/24/2020 Healey, Christopher J.	Correspondence regarding same.	\$870	0.2		\$174.00								
	7/24/2020 Healey, Christopher J.	Review Sunrise's document production 25.	\$870	0.1		\$87.00								
	7/24/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00								
	7/24/2020 Healey, Christopher J.	Prepare correspondence to Attorney Johnson regarding data export deal.	\$870	0.1		\$87.00								
	7/24/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding training documents.	\$870	0.1		\$87.00								
	7/24/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding Flores deposition questions.	\$870	0.2		\$174.00								
	7/24/2020 Healey, Christopher J.	Review Sunrise's documents regarding ADL definitions.	\$870	0.2		\$174.00								
	7/24/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding Flores deposition.	\$870	0.1		\$87.00								
	7/24/2020 Myrick, Tracy R.	Update production log.	\$195	0.3		\$58.50								
	7/24/2020 Myrick, Tracy R.	Update deposition log.	\$195	0.1		\$19.50								
	7/25/2020 Healey, Christopher J.	Review Flores draft transcript.	\$870	0.3		\$261.00								
	7/25/2020 Healey, Christopher J.	Prepare correspondence regarding Discovery Master preparation.	\$870	0.2		\$174.00								
	7/27/2020 Healey, Christopher J.	Prepare correspondence regarding Flores deposition follow-up.	\$870	0.1		\$87.00								
	7/27/2020 Healey, Christopher J.	Review Attorney Marks' correspondence regarding Flores deposition.	\$870	0.1		\$87.00								
	7/27/2020 Healey, Christopher J.	Outline reply brief regarding class certification.	\$870	0.1		\$87.00								
	7/27/2020 Healey, Christopher J.	Draft reply brief arguments and to-do list regarding same.	\$870	3.5		\$3,045.00								
	7/27/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding new plaintiff documents.	\$870	0.2		\$174.00								
	7/27/2020 Myrick, Tracy R.	Upload draft deposition transcript of Dr. Cristina Flores to shared drive and provide caseteam link to location.	\$195	0.1		\$19.50								
	7/27/2020 Myrick, Tracy R.	Download Defendant document production and provide caseteam link to location.	\$195	0.5		\$97.50								
	7/27/2020 Myrick, Tracy R.	Update deposition log.	\$195	0.1		\$19.50								
	7/28/2020 Healey, Christopher J.	Draft reply brief class certification outline.	\$870	1.2		\$1,044.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/28/2020 Healey, Christopher J.	Review Sunrise Production 26.	\$870	0.2		\$174.00								
	7/28/2020 Healey, Christopher J.	Review letter regarding resident files.	\$870	0.1		\$87.00								
	7/28/2020 Healey, Christopher J.	Review Attorney Johnson's correspondence regarding Sunrise motions.	\$870	0.1		\$87.00								
	7/28/2020 Healey, Christopher J.	Review local rules regarding meet and confer requirements.	\$870	0.1		\$87.00								
	7/28/2020 Healey, Christopher J.	Prepare correspondence regarding amended notice regarding class certification motion.	\$870	0.1		\$87.00								
	7/28/2020 Healey, Christopher J.	Further drafting of reply brief outline for class certification.	\$870	3		\$2,610.00								
	7/28/2020 Myrick, Tracy R.	Download Defendant document production and provide caseteam link to location.	\$195	0.3		\$58.50								
	7/28/2020 Myrick, Tracy R.	Update deposition and production log.	\$195	0.2		\$39.00								
	7/28/2020 Myrick, Tracy R.	Upload Final version of P. Kennedy deposition transcript and provide caseteam with link to location.	\$195	0.1		\$19.50								
	7/29/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding unconscionability challenge.	\$870	0.5		\$435.00								
	7/29/2020 Healey, Christopher J.	Conference call with team regarding staffing analysis.	\$870	1.6		\$1,392.00		1.6	1,392.00					
	7/29/2020 Healey, Christopher J.	Review Gibson letter regarding Falkenberg.	\$870	0.1		\$87.00					0.1	87.00		
	7/29/2020 Healey, Christopher J.	Review correspondence regarding discovery referee issues.	\$870	0.1		\$87.00								
	7/29/2020 Healey, Christopher J.	Prepare correspondence regarding redaction issue.	\$870	0.1		\$87.00								
	7/29/2020 Healey, Christopher J.	Telephone conference with Attorney Johnson regarding data issue and meet and confer.	\$870	0.3		\$261.00								
	7/29/2020 Healey, Christopher J.	Review and comment on amendment letter.	\$870	0.1		\$87.00					0.1	87.00		
	7/29/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding amendment issue.	\$870	0.1		\$87.00					0.1	87.00		
	7/29/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$870	0.1		\$87.00								
	7/29/2020 Myrick, Tracy R.	Download P. Kennedy deposition exhibits and provide caseteam with link to location.	\$195	0.6		\$117.00								
	7/29/2020 Myrick, Tracy R.	Import P. Kennedy transcript into CaseNotebook and link exhibits.	\$195	0.5		\$97.50								
	7/30/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding leave to amend/arbitration issue.	\$870	0.1		\$87.00					0.1	87.00		
	7/30/2020 Healey, Christopher J.	Review Gibson letter regarding threatened discovery stay.	\$870	0.1		\$87.00								
	7/30/2020 Healey, Christopher J.	Prepare correspondence regarding reply brief outline.	\$870	0.1		\$87.00								
	7/30/2020 Healey, Christopher J.	Review Gibson correspondence regarding Falkenberg and correspondence to Attorney Wallace regarding leave to amend issue.	\$870	0.2		\$174.00					0.2	174.00		
	7/30/2020 Healey, Christopher J.	Correspondence regarding data redaction issues.	\$870	0.1		\$87.00								
	7/30/2020 Healey, Christopher J.	Further drafting of reply brief outline.	\$870	1.8		\$1,566.00								
	7/30/2020 Healey, Christopher J.	Review cases regarding leave to amend issue and correspondence with Attorney Wallace regarding same.	\$870	0.5		\$435.00					0.5	435.00		
	7/30/2020 Healey, Christopher J.	Review correspondence regarding discovery meet and confer.	\$870	0.1		\$87.00								
	7/30/2020 Healey, Christopher J.	Correspondence with team regarding discovery follow-up.	\$870	0.1		\$87.00								
	7/30/2020 Healey, Christopher J.	Prepare correspondence to team regarding leave to amend meet and confer.	\$870	0.1		\$87.00					0.1	87.00		
	7/30/2020 Myrick, Tracy R.	Upload Dr. Cristina Flores FINAL deposition transcript to shared drive and provide caseteam link to location.	\$195	0.1		\$19.50								
	7/31/2020 Healey, Christopher J.	Review correspondence regarding discovery issues.	\$870	0.1		\$87.00								
	7/31/2020 Healey, Christopher J.	Prepare correspondence regarding production of assessment data.	\$870	0.2		\$174.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/31/2020 Healey, Christopher J.	Review settlement motion in Schlieser employment case.	\$870	0.2		\$174.00								
	7/31/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.2		\$174.00								
	7/31/2020 Healey, Christopher J.	Review Attorney Johnson's report regarding data production timing.	\$870	0.1		\$87.00								
	7/31/2020 Healey, Christopher J.	Response regarding same.	\$870	0.2		\$174.00								
	7/31/2020 Healey, Christopher J.	Response regarding leave to amend letter.	\$870	0.1		\$87.00					0.1	87.00		
	7/31/2020 Healey, Christopher J.	Review Sunrise production No. 27/28.	\$870	0.2		\$174.00								
	7/31/2020 Healey, Christopher J.	Review Attorney Thornton's correspondence regarding assessment data.	\$870	0.1		\$87.00								
	7/31/2020 Healey, Christopher J.	Prepare correspondence to team regarding "no use of withheld information" point.	\$870	0.2		\$174.00								
	7/31/2020 Healey, Christopher J.	Review and revise letter response of threatened discovery stay.	\$870	0.7		\$609.00								
	7/31/2020 Healey, Christopher J.	Review correspondence from Attorney Warren regarding leave to amend issue.	\$870	0.1		\$87.00								
	7/31/2020 Healey, Christopher J.	Revise outline regarding reply brief arguments.	\$870	0.4		\$348.00								
	7/31/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding leave to amend issue.	\$870	0.2		\$174.00						0.2	174.00	
	7/31/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding class certification reply and discovery.	\$870	0.5		\$435.00								
	7/31/2020 Myrick, Tracy R.	Download defendant production and provide caseteam link to location.	\$195	0.5		\$97.50								
	8/3/2020 Healey, Christopher J.	Review correspondence regarding declarant depositions.	\$870	0.2		\$174.00								
	8/3/2020 Healey, Christopher J.	Review Sunrise's response to request for production of documents (Set 7).	\$870	0.1		\$87.00								
	8/3/2020 Healey, Christopher J.	Revise reply brief outline.	\$870	2.3		\$2,001.00								
	8/3/2020 Healey, Christopher J.	Review and respond regarding discovery stay letter.	\$870	0.1		\$87.00								
	8/3/2020 Healey, Christopher J.	Further drafting of reply brief outline.	\$870	0.6		\$522.00								
	8/3/2020 Healey, Christopher J.	Review and comment on Olivera residency agreement issue.	\$870	0.2		\$174.00								
	8/3/2020 Myrick, Tracy R.	Update production log.	\$195	0.3		\$58.50								
	8/4/2020 Healey, Christopher J.	Review correspondence regarding data issues.	\$870	0.1		\$87.00								
	8/4/2020 Healey, Christopher J.	Revise reply brief outline.	\$870	5.4		\$4,698.00								
	8/4/2020 Healey, Christopher J.	Correspondence regarding team call.	\$870	0.1		\$87.00								
	8/4/2020 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location.	\$195	0.3		\$58.50								
	8/5/2020 Healey, Christopher J.	Draft agenda for team call.	\$870	0.2		\$174.00								
	8/5/2020 Healey, Christopher J.	Correspondence regarding case status.	\$870	0.1		\$87.00								
	8/5/2020 Healey, Christopher J.	Revise reply brief outline.	\$870	0.3		\$261.00								
	8/5/2020 Healey, Christopher J.	Conference call with team regarding status and tactics.	\$870	1		\$870.00			1	870.00				
	8/5/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding motion to amend.	\$870	0.2		\$174.00						0.2	174.00	
	8/5/2020 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding motion to compel.	\$870	0.1		\$87.00								
	8/5/2020 Healey, Christopher J.	Correspondence regarding new plaintiffs' documents.	\$870	0.1		\$87.00								
	8/5/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding statistician	\$870	0.1		\$87.00								
	8/5/2020 Healey, Christopher J.	Review residency agreements for new plaintiffs and follow-up correspondence regarding same.	\$870	0.2		\$174.00						0.2	174.00	
	8/5/2020 Healey, Christopher J.	Review and respond to Attorney Marks' inquiry regarding census data.	\$870	0.1		\$87.00								
	8/5/2020 Healey, Christopher J.	Analysis regarding reply brief arguments.	\$870	1.7		\$1,479.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
	8/5/2020 Healey, Christopher J.	Prepare correspondence regarding research items for reply brief.	\$870	0.2							
	8/5/2020 Healey, Christopher J.	Review correspondence/agreements for new plaintiff Falkenberg. Prepare correspondence to Attorney Wallace regarding Synder risk of future harm case.	\$870	0.2	\$174.00					0.2	174.00
	8/5/2020 Healey, Christopher J.	Review and comment on Romeo deposition report.	\$870	0.1	\$87.00						
	8/5/2020 Healey, Christopher J.	Correspondence from Gibson regarding mediation.	\$870	0.2	\$174.00						
	8/5/2020 Healey, Christopher J.	Correspondence from Gibson regarding mediation.	\$870	0.1	\$87.00						
	8/5/2020 Myrick, Tracy R.	Export files from Relativity regarding Residency Agreements and provide to C. Healey.	\$195	0.7	\$136.50						
	8/6/2020 Healey, Christopher J.	Correspondence with Gibson firm regarding mediation dates.	\$870	0.1	\$87.00						
	8/6/2020 Healey, Christopher J.	Correspondence with team regarding same.	\$870	0.2	\$174.00						
	8/6/2020 Healey, Christopher J.	Correspondence regarding Flores invoices.	\$870	0.1	\$87.00						
	8/6/2020 Healey, Christopher J.	Prepare correspondence to Stebner's office regarding mediation information request.	\$870	0.2	\$174.00						
	8/6/2020 Healey, Christopher J.	Prepare correspondence to Carmen Valero regarding research items for reply brief.	\$870	0.3	\$261.00						
	8/6/2020 Healey, Christopher J.	Follow-up correspondence regarding mediation scheduling.	\$870	0.2	\$174.00						
	8/6/2020 Healey, Christopher J.	Review Sunrise document production No. 30.	\$870	0.1	\$87.00						
	8/6/2020 Healey, Christopher J.	Prepare correspondence regarding mediation selection.	\$870	0.1	\$87.00						
	8/6/2020 Healey, Christopher J.	Research regarding class certification cases to support reply brief.	\$870	1.6	\$1,392.00						
	8/6/2020 Myrick, Tracy R.	Download C. Flores deposition exhibits and provide caseteam link to location.	\$195	0.3	\$58.50						
	8/6/2020 Myrick, Tracy R.	Import C. Flores deposition transcript and exhibits into CaseNotebook.	\$195	0.3	\$58.50						
	8/6/2020 Myrick, Tracy R.	Update deposition log.	\$195	0.2	\$39.00						
	8/6/2020 Myrick, Tracy R.	Download defendant production and provide caseteam link to location.	\$195	0.5	\$97.50						
	8/6/2020 Myrick, Tracy R.	Prepare and send email to R. Bonner regarding request to overlay bates values for unitized documents in Relativity workspace. Research CA Fed case authorities re issue: at class cert stage, trial court does not resolve a battle of experts on merits issues, for C. Healey.	\$195	0.3	\$58.50						
	8/6/2020 Valero, Carmen A.	Healey.	\$360	0.5	\$180.00						
	8/7/2020 Healey, Christopher J.	Review Gibson letter regarding expert production.	\$870	0.1	\$87.00						
	8/7/2020 Healey, Christopher J.	Prepare correspondence to team regarding RealPage task time data.	\$870	0.5	\$435.00						
	8/7/2020 Healey, Christopher J.	Prepare correspondence to Attorney Warren regarding document review on target staffing.	\$870	0.1	\$87.00						
	8/7/2020 Healey, Christopher J.	Review Attorney Umpierre's correspondence regarding RealPage data.	\$870	0.1	\$87.00						
	8/7/2020 Healey, Christopher J.	Correspondence with Gibson firm regarding mediation.	\$870	0.1	\$87.00						
	8/7/2020 Healey, Christopher J.	Correspondence with Rob Kaplan's office regarding December 9 mediation.	\$870	0.1	\$87.00						
	8/7/2020 Valero, Carmen A.	Research CA Fed case authorities re issue: whether corporate entity's failure to oversee/monitor exercise of discretion by individual stores/facilities presents a common question for class certification for C. Healey.	\$360	0.8	\$288.00						

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	8/8/2020 Healey, Christopher J.	Review cases regarding facility discretion issue.	\$870	1.4	\$1,218.00								
	8/10/2020 Healey, Christopher J.	Revise reply brief outline.	\$870	1.8	\$1,566.00								
	8/10/2020 Healey, Christopher J.	Review cases regarding failure to implement required policy.	\$870	1.5	\$1,305.00								
	8/10/2020 Healey, Christopher J.	Correspondence regarding mediation.	\$870	0.2	\$174.00								
	8/10/2020 Healey, Christopher J.	Review Flores deposition correction.	\$870	0.1	\$87.00								
	8/10/2020 Healey, Christopher J.	Correspondence regarding discovery issues.	\$870	0.1	\$87.00								
	8/10/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding Walmart test for commonality.	\$870	0.2	\$174.00								
	8/10/2020 Myrick, Tracy R.	Review unitized files containing bates values; further communication with R. Bonner regarding same.	\$195	0.5	\$97.50								
	8/10/2020 Myrick, Tracy R.	Update production log.	\$195	0.2	\$39.00								
	8/11/2020 Healey, Christopher J.	Review correspondence regarding case status.	\$870	0.1	\$87.00								
	8/11/2020 Healey, Christopher J.	Correspondence with team regarding leave to amend.	\$870	0.1	\$87.00								
	8/11/2020 Healey, Christopher J.	Review and respond to Attorney Marks' correspondence regarding incomplete assessment data.	\$870	0.2	\$174.00								
	8/11/2020 Healey, Christopher J.	Review arbitration decision.	\$870	0.1	\$87.00								
	8/11/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1	\$87.00								
	8/11/2020 Healey, Christopher J.	Prepare correspondence regarding research on "significant proof" issue.	\$870	0.2	\$174.00								
	8/11/2020 Healey, Christopher J.	Review expert invoices and prepare correspondence to Attorney Marks regarding payment of same.	\$870	0.1	\$87.00								
	8/11/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding meet and confer regarding motion to add class representatives.	\$870	0.2	\$174.00						0.2	174.00	
	8/11/2020 Healey, Christopher J.	Review summary of class member deposition.	\$870	0.1	\$87.00								
	8/11/2020 Myrick, Tracy R.	Upload L. Greenfield ROUGH draft deposition transcript to shared drive and provide caseteam with link to location	\$195	0.1	\$19.50								
	8/12/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding named plaintiff arguments/responses for reply brief.	\$870	0.1	\$87.00								
	8/12/2020 Healey, Christopher J.	Prepare correspondence regarding pre-mediation letter.	\$870	0.1	\$87.00								
	8/12/2020 Healey, Christopher J.	Draft letter regarding settlement/mediation issues.	\$870	0.9	\$783.00								
	8/12/2020 Healey, Christopher J.	Further drafting reply brief outline.	\$870	2.1	\$1,827.00								
	8/12/2020 Valero, Carmen A.	Research 9th Circuit cases re whether the "significant proof" test in Wall-Mart v Dukes applies outside employment discrimination context, for C. Healey.	\$360	1	\$360.00								
	8/13/2020 Healey, Christopher J.	Outline analysis regarding "in fact" requirement.	\$870	0.1	\$87.00								
	8/13/2020 Healey, Christopher J.	Review cases regarding Wal-Mart "in fact"/significant proof standard.	\$870	1.6	\$1,392.00								
	8/13/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace's office regarding to-do issues.	\$870	0.3	\$261.00								
	8/13/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding staffing analysis and Flores document production.	\$870	0.1	\$87.00								
	8/13/2020 Healey, Christopher J.	Telephone conference with Attorney Warren regarding document search.	\$870	0.2	\$174.00								
	8/13/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1	\$87.00								
	8/13/2020 Myrick, Tracy R.	Upload L. Dale Schroyer errata sheet to shared drive and provide caseteam with link to location.	\$195	0.1	\$19.50								
	8/13/2020 Myrick, Tracy R.	Download defendant production and provide caseteam link to location.	\$195	0.5	\$97.50								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	8/13/2020 Myrick, Tracy R.	Upload Dr. C. Flores Draft deposition transcript and provide caseteam link to location.	\$195	0.1	\$19.50								
	8/13/2020 Valero, Carmen A.	Research 9th circuit case law addressing the issue of whether Wal-Mart makes class certification more difficult in consumer class actions, for C. Healey.	\$360	1	\$360.00								
	8/14/2020 Healey, Christopher J.	Review file regarding privilege issue on Production 24.	\$870	0.1	\$87.00								
	8/14/2020 Healey, Christopher J.	Review summary of Wicht deposition.	\$870	0.1	\$87.00								
	8/14/2020 Healey, Christopher J.	Review correspondence regarding document production.	\$870	0.1	\$87.00								
	8/14/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding privilege log challenge.	\$870	0.1	\$87.00								
	8/14/2020 Healey, Christopher J.	Review and revise letter regarding mediation.	\$870	0.1	\$87.00								
	8/14/2020 Healey, Christopher J.	Review cases regarding Wal Mart interpretation by Circuit decisions.	\$870	2.9	\$2,523.00								
	8/14/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding discovery motion.	\$870	0.1	\$87.00								
	8/14/2020 Healey, Christopher J.	Review and comment on draft motion for leave to amend.	\$870	0.3	\$261.00								
	8/14/2020 Healey, Christopher J.	Further analysis regarding Wal Mart discretion defense.	\$870	0.5	\$435.00								
	8/14/2020 Myrick, Tracy R.	Upload draft versions of T. Wicht deposition transcript and provide caseteam with link to location.	\$195	0.1	\$19.50								
	8/15/2020 Healey, Christopher J.	Outline points for motion for leave to amend.	\$870	0.1	\$87.00								
	8/15/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$870	0.2	\$174.00								
	8/15/2020 Healey, Christopher J.	Review and respond to Attorney Marks' letter regarding expert discovery.	\$870	0.1	\$87.00								
	8/15/2020 Healey, Christopher J.	Review and respond to motion to compel discovery outline.	\$870	0.1	\$87.00								
	8/16/2020 Healey, Christopher J.	Draft insert to reply brief outline regarding WalMart and commonality cases.	\$870	2.7	\$2,349.00								
	8/17/2020 Healey, Christopher J.	Review and comment on motion to compel outline.	\$870	0.3	\$261.00								
	8/17/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding motion to amend.	\$870	0.2	\$174.00								
	8/17/2020 Healey, Christopher J.	Review draft motion for leave to amend and comment regarding same.	\$870	0.2	\$174.00								
	8/17/2020 Healey, Christopher J.	Follow-up correspondence regarding amended complaint.	\$870	0.2	\$174.00								
	8/17/2020 Healey, Christopher J.	Revise reply brief outline.	\$870	1.9	\$1,653.00								
	8/17/2020 Healey, Christopher J.	Prepare correspondence to Attorney Johnson regarding potential subclass.	\$870	0.1	\$87.00								
	8/17/2020 Healey, Christopher J.	Outline arguments regarding discretion defense.	\$870	0.2	\$174.00								
	8/17/2020 Myrick, Tracy R.	Download T. Wicht deposition exhibits and provide caseteam with link to location.	\$195	0.3	\$58.50								
	8/17/2020 Myrick, Tracy R.	Download L. Greenfield deposition exhibits and provide case team with link to location.	\$195	0.3	\$58.50								
	8/18/2020 Healey, Christopher J.	Correspondence with Attorney Johnson regarding motion to amend and subclass issue.	\$870	1.1	\$957.00								
	8/18/2020 Healey, Christopher J.	Review Gibson's correspondence regarding expert production.	\$870	0.1	\$87.00								
	8/18/2020 Healey, Christopher J.	Review and comment on Attorney Umpierre's declaration regarding leave to amend.	\$870	1.3	\$1,131.00								
	8/18/2020 Healey, Christopher J.	Further correspondence with Attorney Johnson regarding subclass issue.	\$870	0.1	\$87.00								
	8/18/2020 Healey, Christopher J.	Review and revise motion for leave to amend.	\$870	0.5	\$435.00					0.5	435.00		
	8/18/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1	\$87.00					0.1	87.00		

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	8/18/2020 Healey, Christopher J.	Draft reply brief outline regarding "discretion" defense.	\$870	1.5	\$1,305.00								
	8/18/2020 Healey, Christopher J.	Review cases regarding subclass issue.	\$870	0.3	\$261.00								
	8/18/2020 Healey, Christopher J.	Telephone conference with Attorney Johnson and Attorney Wallace regarding subclass issue.	\$870	0.6	\$522.00					0.6	522.00		
	8/18/2020 Healey, Christopher J.	Correspondence to Attorney Johnson regarding same.	\$870	0.1	\$87.00					0.1	87.00		
	8/18/2020 Healey, Christopher J.	Follow-up correspondence regarding subclass issue.	\$870	0.2	\$174.00					0.2	174.00		
	8/18/2020 Myrick, Tracy R.	Upload C. Romeo final deposition transcript and provide caseteam link to location.	\$195	0.2	\$39.00								
	8/18/2020 Myrick, Tracy R.	Update production log.	\$195	0.3	\$58.50								
	8/19/2020 Healey, Christopher J.	Review and comment regarding amended subclass definition.	\$870	0.1	\$87.00					0.1	87.00		
	8/19/2020 Healey, Christopher J.	Review and comment on response to Sunrise's deposition request.	\$870	0.1	\$87.00								
	8/19/2020 Healey, Christopher J.	Review objections to declarant subpoenas.	\$870	0.1	\$87.00								
	8/19/2020 Healey, Christopher J.	Review correspondence regarding discovery issues.	\$870	0.1	\$87.00								
	8/19/2020 Healey, Christopher J.	Prepare correspondence regarding arbitration discovery requests.	\$870	0.1	\$87.00								
	8/19/2020 Healey, Christopher J.	Review and comment on Umpierre declaration regarding amendment.	\$870	0.1	\$87.00								
	8/19/2020 Healey, Christopher J.	Analysis regarding impact of discovery delay on class showing.	\$870	0.7	\$609.00								
	8/19/2020 Healey, Christopher J.	Prepare correspondence to Carmen Valero regarding same.	\$870	0.2	\$174.00								
	8/19/2020 Healey, Christopher J.	Draft reply brief outline.	\$870	2.2	\$1,914.00								
	8/19/2020 Healey, Christopher J.	Prepare correspondence regarding MacRae decision regarding leave to amend.	\$870	0.1	\$87.00								
	8/19/2020 Healey, Christopher J.	Outline response on discretion issue.	\$870	0.5	\$435.00								
	8/19/2020 Healey, Christopher J.	Review correspondence regarding expert production.	\$870	0.1	\$87.00								
	8/19/2020 Healey, Christopher J.	Review updated Umpierre declaration.	\$870	0.1	\$87.00								
	8/20/2020 Healey, Christopher J.	Review correspondence regarding discovery issues.	\$870	0.1	\$87.00								
	8/20/2020 Healey, Christopher J.	Prepare correspondence to Attorney Johnson regarding discovery referee.	\$870	0.1	\$87.00								
	8/20/2020 Healey, Christopher J.	Review and comment on draft amended complaint.	\$870	0.3	\$261.00								
	8/20/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1	\$87.00								
	8/20/2020 Healey, Christopher J.	Draft reply brief outline.	\$870	1.8	\$1,566.00								
	8/20/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding amended complaint (.2) and response to discretion defense (.1).	\$870	0.3	\$261.00					0.2	174.00		
	8/20/2020 Healey, Christopher J.	Further revisions to draft amended complaint.	\$870	0.3	\$261.00					0.3	261.00		
	8/20/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.2	\$174.00					0.2	174.00		
	8/20/2020 Healey, Christopher J.	Prepare correspondence to team regarding expert costs.	\$870	0.1	\$87.00								
	8/20/2020 Healey, Christopher J.	Correspondence regarding declarant deposition.	\$870	0.2	\$174.00								
	8/20/2020 Healey, Christopher J.	Review motion to amend.	\$870	0.2	\$174.00								
	8/20/2020 Healey, Christopher J.	Further drafting of reply brief outline.	\$870	0.8	\$696.00								
	8/20/2020 Healey, Christopher J.	Review cases regarding blocked discovery.	\$870	0.3	\$261.00								
	8/21/2020 Healey, Christopher J.	Review cases regarding Defendants' efforts to bifurcate merits and class discovery.	\$870	0.2	\$174.00								
	8/21/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1	\$87.00								
	8/21/2020 Healey, Christopher J.	Correspondence regarding Third Amended Complaint and redline changes to same.	\$870	0.2	\$174.00								
	8/21/2020 Healey, Christopher J.	Correspondence regarding motion to amend.	\$870	0.2	\$174.00								
	8/21/2020 Healey, Christopher J.	Review and respond regarding Defendants' request to depose witness Ziehl.	\$870	0.1	\$87.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	8/21/2020 Healey, Christopher J.	Review redline of amended complaint.	\$870	0.1		\$87.00									
	8/21/2020 Healey, Christopher J.	Prepare correspondence regarding Ziehl deposition request.	\$870	0.3		\$261.00									
	8/21/2020 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding GAL petition.	\$870	0.1		\$87.00									
	8/21/2020 Healey, Christopher J.	Correspondence with Office regarding same.	\$870	0.1		\$87.00									
	8/21/2020 Healey, Christopher J.	Telephone conference with Lucy Valdez regarding amended complaint.	\$870	0.1		\$87.00									
	8/21/2020 Healey, Christopher J.	Conference with Attorney Cocchia regarding Sherifaw files.	\$870	0.2		\$174.00									
	8/21/2020 Healey, Christopher J.	Correspondence regarding GAL filing for Falkenberg and Arora.	\$870	0.2		\$174.00						0.2	174.00		
	8/21/2020 Healey, Christopher J.	Correspondence regarding expert reimbursement	\$870	0.3		\$261.00									
	8/21/2020 Healey, Christopher J.	Pick up Sherifaw files	\$870	0.8		\$696.00									
	8/21/2020 Myrick, Tracy R.	Upload final versions of L. Greenfield deposition transcript and provide caseteam link to location.	\$195	0.1		\$19.50									
	8/21/2020 Myrick, Tracy R.	Import L. Greenfield deposition transcript and exhibits into CaseNotebook.	\$195	0.5		\$97.50									
	8/21/2020 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location.	\$195	0.3		\$58.50									
	8/22/2020 Healey, Christopher J.	Review documents from Shiferaw docket.	\$870	2.7		\$2,349.00	2	1,740.00							
	8/23/2020 Healey, Christopher J.	Prepare correspondence regarding Ziehl deposition request.	\$870	0.1		\$87.00									
	8/23/2020 Healey, Christopher J.	Draft reply brief outline.	\$870	0.9		\$783.00									
	8/23/2020 Healey, Christopher J.	Prepare correspondence to team regarding DSS document review.	\$870	0.2		\$174.00									
	8/24/2020 Healey, Christopher J.	Review Shiferaw docket materials.	\$870	0.3		\$261.00									
	8/24/2020 Healey, Christopher J.	Conference call regarding declarant depositions and DSS discovery.	\$870	0.3		\$261.00									
	8/24/2020 Healey, Christopher J.	Prepare correspondence regarding Shiferaw documents.	\$870	0.2		\$174.00									
	8/24/2020 Healey, Christopher J.	Prepare correspondence to Attorneys Umpierre and Johnson regarding motion to compel Shiferaw materials.	\$870	0.2		\$174.00									
	8/24/2020 Healey, Christopher J.	Review Shiferaw decisions.	\$870	0.4		\$348.00									
	8/24/2020 Healey, Christopher J.	Revise reply brief outline.	\$870	0.2		\$174.00									
	8/24/2020 Healey, Christopher J.	Correspondence regarding proposed order.	\$870	0.1		\$87.00									
	8/24/2020 Healey, Christopher J.	Review Sunrise meet and confer request regarding JOP motion.	\$870	0.1		\$87.00									
	8/24/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1		\$87.00									
	8/24/2020 Healey, Christopher J.	Correspondence regarding Kennedy deposition transcript.	\$870	0.1		\$87.00									
	8/24/2020 Healey, Christopher J.	Research and analysis regarding Sunrise JOP motion.	\$870	4		\$3,480.00									
	8/24/2020 Healey, Christopher J.	Prepare correspondence to Attorney Warren regarding same.	\$870	0.2		\$174.00									
	8/24/2020 Healey, Christopher J.	Research and analysis regarding JOP motion.	\$870	0.9		\$783.00									
	8/24/2020 Healey, Christopher J.	Prepare correspondence Attorney Johnson regarding same.	\$870	0.1		\$87.00									
	8/25/2020 Healey, Christopher J.	Correspondence with Attorney Johnson regarding privilege log.	\$870	0.1		\$87.00									
	8/25/2020 Healey, Christopher J.	Telephone conference with Attorney Warren regarding JOP motion argument.	\$870	0.1		\$87.00									
	8/25/2020 Healey, Christopher J.	Review privilege log.	\$870	0.1		\$87.00									
	8/25/2020 Healey, Christopher J.	Review Sunrise document production.	\$870	0.9		\$783.00									
	8/25/2020 Healey, Christopher J.	Prepare correspondence to Gibson firm regarding privilege log.	\$870	0.1		\$87.00									
	8/25/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding JOP opposition.	\$870	0.1		\$87.00									
	8/25/2020 Healey, Christopher J.	Prepare correspondence to Arns' office regarding privilege log.	\$870	0.2		\$174.00									
	8/25/2020 Healey, Christopher J.	Review Shiferaw briefs and follow-up correspondence regarding same.	\$870	0.5		\$435.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>		
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>
	8/25/2020 Healey, Christopher J.	Review correspondence regarding deposition transcripts.	\$870	0.1		\$87.00							
	8/25/2020 Healey, Christopher J.	Correspondence regarding Sunrise SEHA v4 form.	\$870	0.1		\$87.00							
	8/25/2020 Healey, Christopher J.	Review research regarding reply arguments.	\$870	0.5		\$435.00							
	8/25/2020 Healey, Christopher J.	Outline opposition to JOP motion.	\$870	1.5		\$1,305.00							
	8/25/2020 Healey, Christopher J.	Review cases regarding standing issues.	\$870	1.4		\$1,218.00							
	8/25/2020 Healey, Christopher J.	Telephone conferences with Attorney Johnson regarding meet and confer on JOP motion.	\$870	0.3		\$261.00							
	8/25/2020 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding standing issue and potential amendment.	\$870	0.1		\$87.00							
	8/25/2020 Healey, Christopher J.	Correspondence with Attorney Mansfield.	\$870	0.3		\$261.00							
	8/25/2020 Myrick, Tracy R.	Work with data set to import into review database according to established specifications, update search indexes as necessary and appropriate, perform data validation steps and document all relevant details.	\$195	0.1		\$19.50							
	8/25/2020 Myrick, Tracy R.	Download defendant production and provide caseteam link to location; update production log regarding same.	\$195	0.5		\$97.50							
	8/25/2020 Myrick, Tracy R.	Export SEHA form from Relativity and provide to C. Healey.	\$195	0.5		\$97.50							
	8/26/2020 Healey, Christopher J.	Draft outline of opposition to JOP motion.	\$870	1.4		\$1,218.00							
	8/26/2020 Healey, Christopher J.	Telephone conference with Attorney Mansfield regarding Sonner and related issues.	\$870	0.8		\$696.00							
	8/26/2020 Healey, Christopher J.	Prepare correspondence regarding Shiferaw testimony.	\$870	0.1		\$87.00							
	8/26/2020 Healey, Christopher J.	Review correspondence regarding sample data.	\$870	0.1		\$87.00							
	8/26/2020 Healey, Christopher J.	Review and respond regarding Sunrise's motion to strike issue.	\$870	0.2		\$174.00							
	8/26/2020 Healey, Christopher J.	Draft opposition outline to JOP motion.	\$870	6.5		\$5,655.00	2	1,740.00					
	8/26/2020 Healey, Christopher J.	Review correspondence regarding Ziehl deposition.	\$870	0.1		\$87.00							
	8/26/2020 Healey, Christopher J.	Review and revise response to Gibson firm regarding Ziehl deposition.	\$870	0.1		\$87.00							
	8/26/2020 Healey, Christopher J.	Review correspondence regarding Elder abuse injunction authority.	\$870	0.1		\$87.00							
	8/26/2020 Healey, Christopher J.	Correspondence with Attorney Kawamoto regarding financial elder abuse claims.	\$870	0.1		\$87.00							
	8/26/2020 Healey, Christopher J.	Correspondence with Attorney Johnson regarding case schedule issues.	\$870	0.1		\$87.00							
	8/26/2020 Myrick, Tracy R.	Upload Privilege Log for Production Volume SUN024 and provide caseteam link to location.	\$195	0.1		\$19.50							
	8/26/2020 Myrick, Tracy R.	Download defendant production and provide link to caseteam.	\$195	0.3		\$58.50							
	8/26/2020 Valero, Carmen A.	Research recent case law elaborating on "adequate remedy" test, for C. Healey.	\$360	1		\$360.00							
	8/27/2020 Healey, Christopher J.	Draft reply outline to JOP motion.	\$870	2.6		\$2,262.00							
	8/27/2020 Healey, Christopher J.	Correspondence with Attorney Mansfield regarding Cert III standing argument.	\$870	0.1		\$87.00							
	8/27/2020 Healey, Christopher J.	Further drafting of reply brief regarding JOP motion.	\$870	3		\$2,610.00							
	8/27/2020 Healey, Christopher J.	Research and analysis regarding standing issue.	\$870	1.1		\$957.00							
	8/27/2020 Healey, Christopher J.	Correspondence regarding Ziehl deposition issues.	\$870	0.2		\$174.00							
	8/27/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding case status.	\$870	0.2		\$174.00							
	8/27/2020 Healey, Christopher J.	Prepare correspondence to team regarding current resident plaintiff.	\$870	0.2		\$174.00							

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	8/27/2020 Healey, Christopher J.	Draft opposition to JOP motion and review cases regarding same.	\$870	1.2	\$1,044.00								
	8/27/2020 Myrick, Tracy R.	Update Production log and deposition log.	\$195	0.5	\$97.50								
	8/27/2020 Myrick, Tracy R.	Upload draft versions of L. Lahman deposition transcripts to shared drive and provide caseteam link to location.	\$195	0.1	\$19.50								
	8/27/2020 Valero, Carmen A.	Research courts consideration of equitable factors in deciding to strike or dismiss equitable claims under the no adequate remedy at law test, for C. Healey.	\$360	1	\$360.00								
	8/28/2020 Healey, Christopher J.	Review correspondence regarding additional potential plaintiff, Lesley Greenfield.	\$870	0.1	\$87.00								
	8/28/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1	\$87.00								
	8/28/2020 Healey, Christopher J.	Review correspondence regarding Ziehl deposition.	\$870	0.1	\$87.00								
	8/28/2020 Healey, Christopher J.	Revise JOP opposition outline.	\$870	0.1	\$87.00								
	8/28/2020 Healey, Christopher J.	Correspondence regarding potential new plaintiff on injunction issue.	\$870	0.2	\$174.00								
	8/28/2020 Healey, Christopher J.	Further drafting of JOP opposition.	\$870	0.5	\$435.00								
	8/28/2020 Healey, Christopher J.	Research and analysis regarding standing arguments.	\$870	0.8	\$696.00								
	8/28/2020 Healey, Christopher J.	Correspondence regarding potential injunctive relief representation.	\$870	0.2	\$174.00								
	8/28/2020 Healey, Christopher J.	Revise opposition to JOP motion.	\$870	0.9	\$783.00								
	8/28/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding same.	\$870	0.1	\$87.00								
	8/28/2020 Healey, Christopher J.	Review correspondence from Gibson firm regarding arbitration motion as to Falkenberg.	\$870	0.1	\$87.00						0.1	87.00	
	8/28/2020 Healey, Christopher J.	Prepare correspondence to team regarding opposition to Falkenberg arbitration motion.	\$870	0.4	\$348.00						0.4	348.00	
	8/28/2020 Healey, Christopher J.	Prepare to-do list.	\$870	0.1	\$87.00								
	8/28/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding exception data.	\$870	0.1	\$87.00								
	8/28/2020 Healey, Christopher J.	Review Attorney Johnson's correspondence regarding Sunrise request to petition arbitration.	\$870	0.2	\$174.00						0.2	174.00	
	8/28/2020 Healey, Christopher J.	Research regarding FAA procedural rules.	\$870	0.6	\$522.00						0.6	522.00	
	8/28/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.3	\$261.00						0.3	261.00	
	8/28/2020 Healey, Christopher J.	Review Falkenberg agreement and POA.	\$870	0.6	\$522.00						0.6	522.00	
	8/28/2020 Healey, Christopher J.	Correspondence regarding same.	\$870	0.2	\$174.00						0.2	174.00	
	8/28/2020 Myrick, Tracy R.	Upload Patrick Kennedy errata sheet to his deposition and provide caseteam link to location.	\$195	0.1	\$19.50								
	8/28/2020 Myrick, Tracy R.	Upload T. Wicht errata sheet to shared drive and provide caseteam link to location.	\$195	0.1	\$19.50								
	8/29/2020 Healey, Christopher J.	Correspondence regarding potential "transitory" standing argument.	\$870	4.1	\$3,567.00								
	8/29/2020 Healey, Christopher J.	Correspondence regarding opposition to Falkenberg arbitration petition.	\$870	0.2	\$174.00						0.2	174.00	
	8/29/2020 Healey, Christopher J.	Review deposition summary for Lahman.	\$870	0.1	\$87.00								
	8/29/2020 Healey, Christopher J.	Outline opposition arguments regarding Falkenberg arbitration petition.	\$870	0.2	\$174.00						0.2	174.00	
	8/29/2020 Healey, Christopher J.	Prepare to-do list regarding class motion and discovery.	\$870	0.1	\$87.00								
	8/29/2020 Healey, Christopher J.	Research regarding opposition to arbitration petition.	\$870	1	\$870.00						1	870.00	
	8/29/2020 Healey, Christopher J.	Outline opposition to Falkenberg arbitration petition.	\$870	0.5	\$435.00						0.5	435.00	
	8/29/2020 Healey, Christopher J.	Research regarding 5-day rule under FAA.	\$870	0.5	\$435.00						0.5	435.00	

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	8/29/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.3	\$261.00								
	8/29/2020 Healey, Christopher J.	Review cases regarding "inherently transitory" exception to mootness doctrine.	\$870	0.7	\$609.00								
	8/29/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.3	\$261.00								
	8/30/2020 Healey, Christopher J.	Correspondence from Attorney Wallace regarding mootness argument.	\$870	0.1	\$87.00								
	8/30/2020 Healey, Christopher J.	Research regarding inherently transitory exception and prepare correspondence to team regarding same.	\$870	0.8	\$696.00								
	8/30/2020 Healey, Christopher J.	Review cases regarding JOP opposition and revise same.	\$870	1	\$870.00								
	8/31/2020 Healey, Christopher J.	Review Attorney Marks' correspondence regarding CSV data.	\$870	0.1	\$87.00								
	8/31/2020 Healey, Christopher J.	Review Attorney Chicohel correspondence regarding Hutchison holding.	\$870	0.2	\$174.00								
	8/31/2020 Healey, Christopher J.	Follow-up research regarding arbitration related issues.	\$870	1.6	\$1,392.00						1.6	1,392.00	
	8/31/2020 Healey, Christopher J.	Review Attorney Johnson's report regarding petition to compel arbitration.	\$870	0.1	\$87.00						0.1	87.00	
	8/31/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.2	\$174.00								
	8/31/2020 Healey, Christopher J.	Research regarding Hutchison ruling and authority to bind.	\$870	1.8	\$1,566.00								
	8/31/2020 Healey, Christopher J.	Outline arguments regarding opposition to Falkenberg arbitration.	\$870	1	\$870.00								
	8/31/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.5	\$435.00								
	8/31/2020 Healey, Christopher J.	Review Sunrise's demand to arbitrate Falkenberg claims.	\$870	0.1	\$87.00						0.1	87.00	
	8/31/2020 Healey, Christopher J.	Review Attorney Umpierre's correspondence regarding average resident duration.	\$870	0.1	\$87.00								
	8/31/2020 Myrick, Tracy R.	Prepare save search of document and provide Relativity link to caseteam.	\$195	0.1	\$19.50								
	8/31/2020 Myrick, Tracy R.	Download Third Party production and provide caseteam link to location.	\$195	0.5	\$97.50								
	9/1/2020 Healey, Christopher J.	Review and respond to Attorney Johnson's correspondence regarding Falkenberg arbitration petition.	\$870	0.2	\$174.00						0.2	174.00	
	9/1/2020 Healey, Christopher J.	Prepare correspondence to team regarding Sunrise staffing documents.	\$870	0.1	\$87.00								
	9/1/2020 Healey, Christopher J.	Prepare correspondence regarding JOP opposition arguments.	\$870	0.1	\$87.00								
	9/1/2020 Healey, Christopher J.	Review Sunrise's DSS documents for Grandview.	\$870	0.5	\$435.00								
	9/1/2020 Healey, Christopher J.	Prepare to-do list.	\$870	0.2	\$174.00								
	9/1/2020 Healey, Christopher J.	Revise JOP opposition brief.	\$870	0.9	\$783.00								
	9/1/2020 Healey, Christopher J.	Prepare correspondence regarding sample data follow-up.	\$870	0.1	\$87.00								
	9/1/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1	\$87.00								
	9/1/2020 Healey, Christopher J.	Review and comment regarding draft motion to compel further discovery responses.	\$870	0.7	\$609.00								
	9/1/2020 Healey, Christopher J.	Review and comment on Falkenberg response regarding arbitration demand.	\$870	0.3	\$261.00						0.3	261.00	
	9/1/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.2	\$174.00								
	9/1/2020 Healey, Christopher J.	Correspondence regarding expert costs issues.	\$870	0.1	\$87.00								
	9/1/2020 Healey, Christopher J.	Research regarding privilege log requirements.	\$870	0.1	\$87.00								
	9/1/2020 Healey, Christopher J.	Prepare correspondence regarding same.	\$870	0.1	\$87.00								
	9/1/2020 Healey, Christopher J.	Draft updated ADR report.	\$870	0.1	\$87.00								
	9/1/2020 Healey, Christopher J.	Prepare correspondence regarding FAA research request.	\$870	0.2	\$174.00								
	9/1/2020 Healey, Christopher J.	Review court order continuing class certification hearing.	\$870	0.1	\$87.00								
	9/1/2020 Healey, Christopher J.	Review defendants' motion for judgment on the pleadings.	\$870	0.4	\$348.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	9/1/2020 Healey, Christopher J.	Prepare correspondence regarding same.	\$870	0.1	\$87.00								
	9/1/2020 Myrick, Tracy R.	Update Production log with regard to Third Party Production.	\$195	0.2	\$39.00								
	9/2/2020 Healey, Christopher J.	Revise opposition to JOP motion.	\$870	0.5	\$435.00								
	9/2/2020 Healey, Christopher J.	Review defendant's cases regarding JOP motion.	\$870	1	\$870.00								
	9/2/2020 Healey, Christopher J.	Correspondence regarding Sunrise's request to revise briefing schedule on leave to amend motion.	\$870	0.1	\$87.00								
	9/2/2020 Healey, Christopher J.	Review objections to class certification declarations.	\$870	0.1	\$87.00								
	9/2/2020 Healey, Christopher J.	Review motion to strike Schroyer declaration.	\$870	0.1	\$87.00								
	9/2/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding Ganz duration at Sunrise.	\$870	0.1	\$87.00								
	9/2/2020 Healey, Christopher J.	Prepare for team call.	\$870	0.1	\$87.00								
	9/2/2020 Healey, Christopher J.	Team call regarding leave to amend motion.	\$870	0.6	\$522.00			0.6	522.00		0		0
	9/2/2020 Healey, Christopher J.	Review cases cited in Sunrise's JOP motion.	\$870	1.7	\$1,479.00	1	870.00						
	9/2/2020 Healey, Christopher J.	Prepare correspondence to Attorney Johnson regarding inadequate legal remedies allegation.	\$870	0.1	\$87.00								
	9/2/2020 Healey, Christopher J.	Correspondence with Attorney Johnson regarding JOP cases.	\$870	0.3	\$261.00								
	9/2/2020 Healey, Christopher J.	Review Sunrise's motion to strike Flores declaration.	\$870	0.2	\$174.00								
	9/2/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1	\$87.00								
	9/2/2020 Healey, Christopher J.	Revise opposition to JOP motion.	\$870	0.5	\$435.00								
	9/2/2020 Healey, Christopher J.	Review Sunrise's motion to strike Kennedy declaration.	\$870	0.1	\$87.00								
	9/2/2020 Healey, Christopher J.	Review Sunrise's class certification opposition.	\$870	0.1	\$87.00								
	9/3/2020 Healey, Christopher J.	Correspondence regarding Defendants' opposition briefing.	\$870	0.3	\$261.00								
	9/3/2020 Healey, Christopher J.	Prepare correspondence regarding team call.	\$870	0.2	\$174.00								
	9/3/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding status.	\$870	0.1	\$87.00								
	9/3/2020 Healey, Christopher J.	Review Sunrise opposition to class motion.	\$870	1.6	\$1,392.00								
	9/3/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding discovery sequence.	\$870	0.1	\$87.00								
	9/3/2020 Healey, Christopher J.	Review Sunrise opposition papers.	\$870	1	\$870.00								
	9/3/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding Sunrise experts on staffing issues.	\$870	0.2	\$174.00								
	9/3/2020 Healey, Christopher J.	Prepare agenda for team call.	\$870	0.1	\$87.00								
	9/3/2020 Healey, Christopher J.	Research regarding Sunrise opposition authority.	\$870	0.5	\$435.00								
	9/3/2020 Healey, Christopher J.	Prepare correspondence to Attorney Thamer regarding Musoke deposition.	\$870	0.1	\$87.00								
	9/3/2020 Healey, Christopher J.	Prepare correspondence regarding missing declarations.	\$870	0.2	\$174.00								
	9/3/2020 Healey, Christopher J.	Review cases regarding arbitration petition.	\$870	0.3	\$261.00						0.3		261.00
	9/3/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1	\$87.00						0.1		87.00
	9/4/2020 Healey, Christopher J.	Review defendant's filing regarding class certification opposition.	\$870	0.1	\$87.00								
	9/4/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1	\$87.00								
	9/4/2020 Healey, Christopher J.	Prepare correspondence to Attorney Johnson regarding response to arbitration petition for Falkenberg.	\$870	0.2	\$174.00						0.2		174.00
	9/4/2020 Healey, Christopher J.	Review Attorney Wallace's insert to JOP opposition on "inherently transitory" exception and correspondence regarding same.	\$870	0.1	\$87.00								
	9/4/2020 Healey, Christopher J.	Revise JOP opposition.	\$870	0.1	\$87.00								
	9/4/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding class certification opposition and reply arguments.	\$870	0.2	\$174.00								
	9/4/2020 Healey, Christopher J.	Draft class reply outline.	\$870	0.2	\$174.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	9/4/2020 Healey, Christopher J.	Prepare correspondence to team regarding "to do" approach on class reply.	\$870	1.2	\$1,044.00								
	9/4/2020 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding Musoke deposition and reply arguments.	\$870	0.3	\$261.00								
	9/4/2020 Healey, Christopher J.	Telephone conference regarding class reply support.	\$870	0.1	\$87.00								
	9/4/2020 Healey, Christopher J.	Correspondence regarding additional to do issues.	\$870	0.6	\$522.00								
	9/4/2020 Healey, Christopher J.	Telephone conference with team regarding class certification reply, discovery and related issues.	\$870	1	\$870.00								
	9/4/2020 Healey, Christopher J.	Follow-up correspondence regarding Sunrise witnesses and documents.	\$870	0.3	\$261.00								
	9/4/2020 Healey, Christopher J.	Follow-up correspondence regarding Watermark time study information.	\$870	0.2	\$174.00								
	9/4/2020 Healey, Christopher J.	Prepare correspondence regarding missing exhibits from Sunrise filing.	\$870	0.2	\$174.00								
	9/4/2020 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding task studies.	\$870	0.1	\$87.00								
	9/5/2020 Healey, Christopher J.	Draft class certification reply brief.	\$870	2.1	\$1,827.00								
	9/5/2020 Healey, Christopher J.	Research regarding defendants' opposition arguments to class motion.	\$870	1	\$870.00								
	9/5/2020 Healey, Christopher J.	Outline responses to Flores motion to strike.	\$870	0.1	\$87.00								
	9/5/2020 Healey, Christopher J.	Correspondence with Attorney Thamer regarding Sunrise staffing model.	\$870	0.1	\$87.00								
	9/5/2020 Healey, Christopher J.	Draft class certification reply to Sunrise's arbitration section.	\$870	1.3	\$1,131.00								
	9/6/2020 Healey, Christopher J.	Outline opposition to Sunrise's motion to strike expert testimony.	\$870	0.2	\$174.00								
	9/6/2020 Healey, Christopher J.	Research/draft opposition to arbitration argument in class opposition.	\$870	4.7	\$4,089.00	1	870.00						
	9/7/2020 Healey, Christopher J.	Continue research and drafting opposition to arbitration arguments in Sunrise's class opposition.	\$870	4.1	\$3,567.00	2	1,740.00						
	9/7/2020 Healey, Christopher J.	Draft outline of opposition to Sunrise's motion to strike experts.	\$870	1.5	\$1,305.00								
	9/7/2020 Healey, Christopher J.	Research regarding Sunrise's class certification opposition arguments.	\$870	0.5	\$435.00								
	9/8/2020 Healey, Christopher J.	Research regarding Grontzitsky decision and evidence issues.	\$870	0.6	\$522.00								
	9/8/2020 Healey, Christopher J.	Correspondence regarding Sunrise opposition filing.	\$870	0.2	\$174.00								
	9/8/2020 Healey, Christopher J.	Review Allyn declaration.	\$870	0.1	\$87.00								
	9/8/2020 Healey, Christopher J.	Revise letter regarding missing exhibits.	\$870	0.1	\$87.00								
	9/8/2020 Healey, Christopher J.	Draft reply brief regarding commonality arguments.	\$870	4.2	\$3,654.00								
	9/8/2020 Healey, Christopher J.	Correspondence with Attorney Johnson regarding discovery proceedings.	\$870	0.3	\$261.00								
	9/8/2020 Healey, Christopher J.	Further drafting reply brief regarding commonality issues.	\$870	1.2	\$1,044.00								
	9/9/2020 Healey, Christopher J.	Further drafting reply on commonality argument.	\$870	6.5	\$5,655.00	2	1,740.00						
	9/9/2020 Healey, Christopher J.	Correspondence regarding discovery master conference.	\$870	0.2	\$174.00								
	9/9/2020 Healey, Christopher J.	Review and respond to correspondence regarding Falkenberg petition.	\$870	0.1	\$87.00					0.1	87.00		
	9/9/2020 Healey, Christopher J.	Review Sunrise's petition regarding Falkenberg.	\$870	0.2	\$174.00					0.2	174.00		
	9/9/2020 Myrick, Tracy R.	Upload L. Lahman final versions of deposition transcript and provide caseteam link to location.	\$195	0.2	\$39.00								
	9/10/2020 Healey, Christopher J.	Further drafting reply arguments regarding commonality.	\$870	1.1	\$957.00								
	9/10/2020 Healey, Christopher J.	Prepare correspondence regarding Falkenberg deposition.	\$870	0.2	\$174.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	9/10/2020 Healey, Christopher J.	Research and draft regarding understaffing common issues for reply brief.	\$870	0.7	\$609.00								
	9/10/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding response on Flores/Schroyer arguments.	\$870	0.2	\$174.00								
	9/10/2020 Healey, Christopher J.	Correspondence regarding discovery master hearing.	\$870	0.1	\$87.00								
	9/10/2020 Healey, Christopher J.	Outline supplemental brief regarding data motion.	\$870	0.2	\$174.00								
	9/10/2020 Healey, Christopher J.	Follow-up correspondence regarding discovery conference.	\$870	0.2	\$174.00								
	9/10/2020 Healey, Christopher J.	Prepare case valuation summary.	\$870	0.5	\$435.00								
	9/10/2020 Healey, Christopher J.	Review and respond to Attorney Johnson's correspondence regarding arbitration petition issues.	\$870	0.2	\$174.00								
	9/11/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Flores analysis.	\$870	0.2	\$174.00								
	9/11/2020 Healey, Christopher J.	Outline opening section of reply brief.	\$870	0.2	\$174.00								
	9/11/2020 Healey, Christopher J.	Draft overview opening section of reply class brief.	\$870	2	\$1,740.00								
	9/11/2020 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding Flores issues and Sunrise expert analysis.	\$870	0.2	\$174.00								
	9/11/2020 Healey, Christopher J.	Telephone conference with team regarding discovery, arbitration and related issues.	\$870	0.8	\$696.00								
	9/11/2020 Healey, Christopher J.	Draft reply brief overview section.	\$870	0.6	\$522.00								
	9/11/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding investigation effort and arbitration petition.	\$870	0.1	\$87.00								
	9/11/2020 Healey, Christopher J.	Draft reply brief regarding class motion.	\$870	1.7	\$1,479.00								
	9/11/2020 Healey, Christopher J.	Outline response to factual background section for class reply.	\$870	0.4	\$348.00								
	9/12/2020 Healey, Christopher J.	Prepare correspondence to Attorney Johnson regarding discovery costs.	\$870	0.2	\$174.00								
	9/12/2020 Healey, Christopher J.	Prepare correspondence to Carmen Valero regarding research assignment.	\$870	0.2	\$174.00								
	9/12/2020 Healey, Christopher J.	Outline supplemental brief regarding data motion.	\$870	0.3	\$261.00								
	9/12/2020 Healey, Christopher J.	Draft supplemental brief regarding data motion.	\$870	0.5	\$435.00								
	9/12/2020 Healey, Christopher J.	Research and drafting class reply argument.	\$870	6	\$5,220.00								
	9/13/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding Pro Model schedule.	\$870	0.1	\$87.00								
	9/13/2020 Healey, Christopher J.	Research and drafting reply brief argument.	\$870	1.2	\$1,044.00								
	9/13/2020 Healey, Christopher J.	Prepare correspondence to team regarding deposition scheduling.	\$870	0.1	\$87.00								
	9/13/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding contract review.	\$870	0.1	\$87.00								
	9/14/2020 Healey, Christopher J.	Further research and drafting regarding class reply.	\$870	4	\$3,480.00								
	9/14/2020 Healey, Christopher J.	Further drafting and analysis regarding class reply brief.	\$870	3.6	\$3,132.00	1	870.00						
	9/15/2020 Healey, Christopher J.	Prepare correspondence regarding team call.	\$870	0.1	\$87.00								
	9/15/2020 Healey, Christopher J.	Review and comment on draft update discovery brief.	\$870	0.2	\$174.00								
	9/15/2020 Healey, Christopher J.	Further drafting reply brief.	\$870	6	\$5,220.00								
	9/15/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding fee sharing agreement.	\$870	0.1	\$87.00								
	9/15/2020 Healey, Christopher J.	Correspondence regarding class member documents.	\$870	0.1	\$87.00								
	9/15/2020 Healey, Christopher J.	Review Kennedy invoice.	\$870	0.1	\$87.00								
	9/15/2020 Healey, Christopher J.	Analysis regarding risk of harm issue.	\$870	0.2	\$174.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
		Research case authorities supporting issue: def not aggrieved unless request for leave to add class representative is granted, for C.											
	9/15/2020 Valero, Carmen A.	Healey.	\$360	1	\$360.00								
	9/16/2020 Healey, Christopher J.	Draft class certification reply brief.	\$870	4.6	\$4,002.00								
	9/16/2020 Healey, Christopher J.	Correspondence regarding discovery issues.	\$870	0.1	\$87.00								
	9/16/2020 Healey, Christopher J.	Review Sunrise staff and family declarations.	\$870	0.3	\$261.00								
	9/16/2020 Healey, Christopher J.	Prepare for team call.	\$870	0.3	\$261.00								
	9/16/2020 Healey, Christopher J.	Conference call with team regarding discovery and reply brief issues.	\$870	0.9	\$783.00			0.9	783.00				
	9/16/2020 Healey, Christopher J.	Review expert declarations.	\$870	0.3	\$261.00								
	9/16/2020 Healey, Christopher J.	Further drafting of reply brief.	\$870	1.2	\$1,044.00								
	9/16/2020 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location.	\$195	0.3	\$58.50								
	9/16/2020 Myrick, Tracy R.	Download Defendant Expert Witness Productions and provide caseteam with links to location.	\$195	0.8	\$156.00								
	9/17/2020 Healey, Christopher J.	Correspondence regarding discovery issues.	\$870	0.2	\$174.00								
	9/17/2020 Healey, Christopher J.	Review court filing.	\$870	0.1	\$87.00								
	9/17/2020 Healey, Christopher J.	Draft class certification reply brief.	\$870	3.8	\$3,306.00								
	9/17/2020 Healey, Christopher J.	Further drafting of class reply briefing.	\$870	1	\$870.00								
	9/17/2020 Healey, Christopher J.	Analysis regarding Sunrise's challenge to Flores testimony.	\$870	1.5	\$1,305.00								
	9/17/2020 Myrick, Tracy R.	Update Production Log to reflect Defendant productions.	\$195	0.5	\$97.50								
	9/18/2020 Healey, Christopher J.	Draft inserts to reply brief on class motion.	\$870	1.6	\$1,392.00								
	9/18/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding responses to Sunrise deposition arguments.	\$870	0.1	\$87.00								
	9/18/2020 Healey, Christopher J.	Further drafting of reply brief.	\$870	4.9	\$4,263.00								
	9/18/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1	\$87.00								
	9/18/2020 Myrick, Tracy R.	Review and update deposition log.	\$195	0.3	\$58.50								
	9/19/2020 Healey, Christopher J.	Draft opposition to motion to strike expert declaration.	\$870	0.2	\$174.00								
	9/19/2020 Healey, Christopher J.	Outline deposition plan.	\$870	0.1	\$87.00								
	9/21/2020 Healey, Christopher J.	Reply to Attorney Wallace's correspondence regarding reply brief and discovery.	\$870	0.1	\$87.00								
	9/21/2020 Healey, Christopher J.	Prepare correspondence to Attorney Needham regarding Musoke deposition.	\$870	0.2	\$174.00								
	9/21/2020 Healey, Christopher J.	Review Sunrise's correspondence regarding staffing hours.	\$870	0.2	\$174.00								
	9/21/2020 Healey, Christopher J.	Correspondence regarding Sunrise's application regarding leave to amend opposition.	\$870	0.1	\$87.00								
	9/21/2020 Healey, Christopher J.	Review Sunrise updated production.	\$870	0.5	\$435.00								
	9/21/2020 Healey, Christopher J.	Analysis regarding class reply arguments.	\$870	0.3	\$261.00								
	9/21/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding same.	\$870	0.2	\$174.00								
	9/21/2020 Healey, Christopher J.	Prepare correspondence regarding motion to strike open discovery.	\$870	0.1	\$87.00								
	9/21/2020 Healey, Christopher J.	Prepare correspondence to Attorney Warren regarding Sunrise's staffing procedure documents.	\$870	0.2	\$174.00								
	9/21/2020 Healey, Christopher J.	Prepare correspondence to team regarding class reply and team call.	\$870	0.2	\$174.00								
	9/21/2020 Healey, Christopher J.	Outline approach regarding staffing depositions.	\$870	0.1	\$87.00								
	9/21/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding CM centric issue.	\$870	0.1	\$87.00								
	9/22/2020 Healey, Christopher J.	Draft opposition to motion to strike experts.	\$870	2.1	\$1,827.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	9/22/2020 Healey, Christopher J.	Correspondence with Attorney Warren regarding deposition testimony.	\$870	0.2		\$174.00									
	9/22/2020 Healey, Christopher J.	Review Sunrise arguments regarding Flores testimony.	\$870	0.2		\$174.00									
	9/22/2020 Healey, Christopher J.	Draft opposition to Flores motion to strike.	\$870	2.2		\$1,914.00									
	9/22/2020 Healey, Christopher J.	Review Sunrise case calendar.	\$870	0.1		\$87.00									
	9/22/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding Flores testimony.	\$870	0.1		\$87.00									
	9/23/2020 Healey, Christopher J.	Outline team call to do list.	\$870	0.2		\$174.00									
	9/23/2020 Healey, Christopher J.	Outline points for Berry deposition.	\$870	0.1		\$87.00									
	9/23/2020 Healey, Christopher J.	Correspondence regarding Falkenberg petition.	\$870	0.1		\$87.00									
	9/23/2020 Healey, Christopher J.	Review Crandall declaration.	\$870	0.5		\$435.00									
	9/23/2020 Healey, Christopher J.	Prepare correspondence regarding Ward declaration.	\$870	0.1		\$87.00									
	9/23/2020 Healey, Christopher J.	Review Sunrise's motion to strike Schroyer declaration and outline response regarding same.	\$870	0.3		\$261.00									
	9/23/2020 Healey, Christopher J.	Prepare correspondence to Kennedy's office regarding motion to strike and Walker deposition.	\$870	0.2		\$174.00									
	9/23/2020 Healey, Christopher J.	Prepare correspondence to team regarding Falkenberg petition to arbitration.	\$870	0.5		\$435.00						0.5	435.00		
	9/23/2020 Healey, Christopher J.	Prepare for team call.	\$870	0.2		\$174.00									
	9/23/2020 Healey, Christopher J.	Conference call with team regarding discovery and class reply preparation.	\$870	0.7		\$609.00									
	9/23/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Flores and Sunrise's motion to strike.	\$870	0.7		\$609.00									
	9/23/2020 Healey, Christopher J.	Follow-up correspondence with Attorney Marks regarding same.	\$870	0.1		\$87.00									
	9/23/2020 Healey, Christopher J.	Review file regarding Sunrise's argument no disclosure of unconscionability challenge.	\$870	0.2		\$174.00									
	9/23/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$870	0.1		\$87.00									
	9/23/2020 Healey, Christopher J.	Follow-up correspondence with Attorney Stebner regarding Sunrise witness.	\$870	0.1		\$87.00									
	9/23/2020 Healey, Christopher J.	Prepare correspondence to team regarding discovery schedule.	\$870	0.1		\$87.00									
	9/24/2020 Healey, Christopher J.	Correspondence regarding Sunrise Staffing Procedure exhibits.	\$870	0.1		\$87.00									
	9/24/2020 Healey, Christopher J.	Draft Flores opposition to motion to strike.	\$870	4.4		\$3,828.00									
	9/25/2020 Healey, Christopher J.	Review discovery correspondence.	\$870	0.1		\$87.00									
	9/25/2020 Healey, Christopher J.	Prepare correspondence to team regarding deposition schedule.	\$870	0.2		\$174.00									
	9/25/2020 Healey, Christopher J.	Revise JOP opposition.	\$870	0.1		\$87.00									
	9/25/2020 Healey, Christopher J.	Review file regarding case dates.	\$870	0.1		\$87.00									
	9/25/2020 Healey, Christopher J.	Correspondence regarding SCC electronic case documentation.	\$870	0.1		\$87.00									
	9/25/2020 Healey, Christopher J.	Review Carmen Valero's research regarding MTS expert testimony.	\$870	0.2		\$174.00									
	9/25/2020 Healey, Christopher J.	Revise motion to strike Flores opposition.	\$870	1.1		\$957.00									
	9/25/2020 Healey, Christopher J.	Correspondence regarding case schedule.	\$870	0.2		\$174.00									
	9/25/2020 Myrick, Tracy R.	Download third party production provided by defendants and provide caseteam link to location and update production log regarding same.	\$195	0.4		\$78.00									
	9/25/2020 Valero, Carmen A.	Research Ninth Circuit authority for point found in Lapsley v XTec case, for C. Healey.	\$360	1		\$360.00									
	9/26/2020 Healey, Christopher J.	Review correspondence regarding discovery issues.	\$870	0.1		\$87.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	9/26/2020 Healey, Christopher J.	Prepare correspondence regarding class member document motion.	\$870	0.1		\$87.00									
	9/26/2020 Healey, Christopher J.	Review response to Falkenberg's petition.	\$870	0.2		\$174.00									
	9/26/2020 Healey, Christopher J.	Review Carmen Valero's research regarding motion to strike opposition.	\$870	0.4		\$348.00									
	9/26/2020 Healey, Christopher J.	Revise motion to strike Flores declaration opposition.	\$870	0.3		\$261.00									
	9/28/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding deposition schedule.	\$870	0.1		\$87.00									
	9/28/2020 Healey, Christopher J.	Correspondence regarding case schedule.	\$870	0.2		\$174.00									
	9/28/2020 Healey, Christopher J.	Review and comment regarding motion to compel draft.	\$870	0.2		\$174.00									
	9/28/2020 Healey, Christopher J.	Prepare correspondence to team regarding call agenda and scheduling.	\$870	0.3		\$261.00									
	9/28/2020 Healey, Christopher J.	Prepare correspondence to Attorney Arns regarding Berry deposition.	\$870	0.1		\$87.00									
	9/28/2020 Healey, Christopher J.	Telephone conference with team regarding case schedule and staffing analysis.	\$870	0.8		\$696.00				0.8	696.00				
	9/28/2020 Healey, Christopher J.	Prepare correspondence regarding Berry deposition.	\$870	0.2		\$174.00									
	9/28/2020 Myrick, Tracy R.	Download L. Lahman deposition exhibits and provide caseteam link to location.	\$195	0.3		\$58.50									
	9/28/2020 Myrick, Tracy R.	Upload L. Greenfield errata sheet and provide caseteam link to location.	\$195	0.3		\$58.50									
	9/28/2020 Myrick, Tracy R.	Download C. Romeo deposition exhibits and provide link to caseteam.	\$195	0.3		\$58.50									
	9/28/2020 Myrick, Tracy R.	Prepare and Import L. Lahman and C. Romeo deposition transcripts and exhibits into CaseNotebook	\$195	1		\$195.00									
	9/28/2020 Myrick, Tracy R.	Update Deposition Log.	\$195	0.1		\$19.50									
	9/28/2020 Valero, Carmen A.	Research Federal statute/case law equivalent to CACI 203, for C. Healey.	\$360	1		\$360.00									
	9/29/2020 Healey, Christopher J.	Review correspondence regarding discovery.	\$870	0.1		\$87.00									
	9/29/2020 Healey, Christopher J.	Draft opposition to motion to strike Flores declaration.	\$870	5.1		\$4,437.00									
	9/29/2020 Healey, Christopher J.	Review correspondence regarding deposition scheduling.	\$870	0.1		\$87.00			2	1,740.00					
	9/29/2020 Healey, Christopher J.	Review and respond regarding discovery compromise email.	\$870	0.2		\$174.00									
	9/29/2020 Healey, Christopher J.	Response to Attorney Marks' request to Daubert issues.	\$870	0.1		\$87.00									
	9/30/2020 Healey, Christopher J.	Review correspondence regarding deposition scheduling.	\$870	0.1		\$87.00									
	9/30/2020 Healey, Christopher J.	Prepare correspondence regarding data discrepancies.	\$870	0.2		\$174.00									
	9/30/2020 Healey, Christopher J.	Review Sunrise staffing.	\$870	0.8		\$696.00									
	9/30/2020 Healey, Christopher J.	Correspondence regarding Watermark time studies.	\$870	0.2		\$174.00									
	9/30/2020 Healey, Christopher J.	Review and comment on extension request.	\$870	0.1		\$87.00									
	9/30/2020 Healey, Christopher J.	Correspondence regarding Crandall analysis.	\$870	0.1		\$87.00									
	9/30/2020 Healey, Christopher J.	Review Ward work papers.	\$870	0.2		\$174.00									
	9/30/2020 Healey, Christopher J.	Prepare correspondence regarding research assignment.	\$870	0.1		\$87.00									
	9/30/2020 Healey, Christopher J.	Telephone conference with Attorney Ross regarding research request.	\$870	0.2		\$174.00									
	9/30/2020 Healey, Christopher J.	Correspondence regarding RealPage data.	\$870	0.1		\$87.00									
	9/30/2020 Healey, Christopher J.	Review Sunrise data.	\$870	1		\$870.00									
	9/30/2020 Healey, Christopher J.	Prepare correspondence to team regarding Sunrise staffing data.	\$870	0.1		\$87.00									

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	9/30/2020 Ross, Rachel L.	Strategy call with C. Healey re research relating to expert reliance on information subject to a protective order in a separate litigation	\$405	0.3	\$121.50	0.3	121.5						
	10/1/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding Crandall deposition.	\$870	0.2	\$174.00								
	10/1/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding expert discovery requests.	\$870	0.2	\$174.00								
	10/1/2020 Healey, Christopher J.	Revise meet and confer letter regarding staffing data.	\$870	1.4	\$1,218.00								
	10/1/2020 Healey, Christopher J.	Correspondence regarding discovery issues.	\$870	0.2	\$174.00								
	10/1/2020 Healey, Christopher J.	Review Sunrise's response to extension request.	\$870	0.1	\$87.00								
	10/1/2020 Healey, Christopher J.	Correspondence regarding Sunrise's arbitration defense.	\$870	0.1	\$87.00								
	10/1/2020 Healey, Christopher J.	Review Attorney Yarnall's information regarding staff declarants.	\$870	1	\$870.00								
	10/1/2020 Healey, Christopher J.	Prepare correspondence to team regarding staff declarant depositions.	\$870	0.2	\$174.00								
	10/1/2020 Healey, Christopher J.	Prepare correspondence regarding extension request and potential arguments.	\$870	0.3	\$261.00								
	10/1/2020 Healey, Christopher J.	Review and revise attachment to data letter.	\$870	0.2	\$174.00								
	10/1/2020 Healey, Christopher J.	Prepare correspondence regarding motion to compel.	\$870	0.1	\$87.00								
	10/1/2020 Healey, Christopher J.	Prepare correspondence regarding Watermark time studies.	\$870	0.1	\$87.00								
	10/2/2020 Healey, Christopher J.	Prepare correspondence to Mr. Chicotel regarding Watermark document.	\$870	0.1	\$87.00								
	10/2/2020 Healey, Christopher J.	Correspondence regarding expert discovery issues.	\$870	0.1	\$87.00								
	10/2/2020 Healey, Christopher J.	Correspondence regarding expert discovery materials and meet and confer letter regarding same.	\$870	0.2	\$174.00								
	10/2/2020 Healey, Christopher J.	Correspondence regarding potential statistical expert.	\$870	0.2	\$174.00								
	10/2/2020 Healey, Christopher J.	Review and revise motion to compel discovery from Sunrise.	\$870	1.3	\$1,131.00								
	10/2/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$870	0.2	\$174.00								
	10/2/2020 Healey, Christopher J.	Correspondence with Mr. Chicotel regarding Watermark issues.	\$870	0.2	\$174.00								
	10/2/2020 Healey, Christopher J.	Prepare correspondence to team regarding to do issue.	\$870	0.3	\$261.00								
	10/2/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Crandall/Ward deposition preparation.	\$870	0.2	\$174.00								
	10/2/2020 Healey, Christopher J.	Review and comment regarding expert document requests.	\$870	0.3	\$261.00								
	10/2/2020 Healey, Christopher J.	Review and revise letter regarding extension request.	\$870	0.2	\$174.00								
	10/2/2020 Healey, Christopher J.	Follow-up correspondence regarding expert document requests.	\$870	0.1	\$87.00								
	10/3/2020 Healey, Christopher J.	Further drafting of opposition to motion to strike Flores declaration.	\$870	1.5	\$1,305.00								
	10/3/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding financial pressure documents.	\$870	0.5	\$435.00								
	10/3/2020 Healey, Christopher J.	Analysis and review documents regarding care manager focus.	\$870	0.1	\$87.00								
	10/3/2020 Healey, Christopher J.	Outline defendant's arguments regarding Flores analysis.	\$870	0.5	\$435.00								
	10/4/2020 Healey, Christopher J.	Outline defendant's arguments regarding staffing analysis.	\$870	1.3	\$1,131.00								
	10/4/2020 Healey, Christopher J.	Review Musoke declaration.	\$870	0.3	\$261.00								
	10/4/2020 Healey, Christopher J.	Review Crandall declaration.	\$870	0.5	\$435.00								
	10/4/2020 Healey, Christopher J.	Review Ward declaration.	\$870	0.3	\$261.00								
	10/4/2020 Healey, Christopher J.	Outline key points for depositions of Sunrise experts.	\$870	0.8	\$696.00								
	10/4/2020 Ross, Rachel L.	Legal research regarding the ability to use documents subject to a protective order in a separate proceeding	\$405	1.1	\$445.50	1.1	445.5						

	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>							
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Travel</u>	<u>Fees</u>
<u>Fees</u>							<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	10/5/2020 Healey, Christopher J.	Outline defendant's expert argument.	\$870	1.3		\$1,131.00								
	10/5/2020 Healey, Christopher J.	Telephone conference with Attorney Warren regarding document review.	\$870	0.1		\$87.00								
	10/5/2020 Healey, Christopher J.	Review correspondence.	\$870	0.1		\$87.00								
	10/5/2020 Healey, Christopher J.	Review and comment on Judge Guilford's discovery ruling.	\$870	0.5		\$435.00								
	10/5/2020 Healey, Christopher J.	Telephone conference with Tony Chicotel (CANHR) regarding Watermark studies.	\$870	0.5		\$435.00								
	10/5/2020 Healey, Christopher J.	Telephone conference with Attorney Johnson regarding discovery hearing.	\$870	0.3		\$261.00								
	10/5/2020 Healey, Christopher J.	Draft correspondence regarding expert challenges.	\$870	1		\$870.00								
	10/5/2020 Healey, Christopher J.	Prepare correspondence regarding Watermark analysis.	\$870	0.3		\$261.00								
	10/5/2020 Healey, Christopher J.	Draft list of key deposition points.	\$870	0.2		\$174.00								
	10/5/2020 Myrick, Tracy R.	Receipt of defendant PointClickShare Production and upload to shared drive.	\$195	0.4		\$78.00								
	10/5/2020 Myrick, Tracy R.	Search in Relativity for Census Data spreadsheet and provide to C. Healey.	\$195	0.3		\$58.50								
	10/5/2020 Myrick, Tracy R.	Locate third party document in Relativity per S. Warren and provide details.	\$195	0.3		\$58.50								
	10/5/2020 Ross, Rachel L.	Legal research regarding the ability to use documents subject to a protective order in a separate proceeding	\$405	1.5		\$607.50	1.5	607.5						
	10/6/2020 Healey, Christopher J.	Correspondence regarding assessment data production.	\$870	0.1		\$87.00								
	10/6/2020 Healey, Christopher J.	Further drafting opposition to motion to strike Flores declaration.	\$870	3.1		\$2,697.00								
	10/6/2020 Myrick, Tracy R.	Provide caseteam link to location of defendant production of PointClickCare files.	\$195	0.1		\$19.50								
	10/6/2020 Myrick, Tracy R.	Upload L. Lahman's Errata sheet to shared drive and provide caseteam link to location.	\$195	0.1		\$19.50								
	10/7/2020 Healey, Christopher J.	Review correspondence regarding Discovery Master ruling.	\$870	0.1		\$87.00								
	10/7/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding witness interviews.	\$870	0.1		\$87.00								
	10/7/2020 Healey, Christopher J.	Prepare correspondence to team regarding Discovery Master ruling.	\$870	0.2		\$174.00								
	10/7/2020 Healey, Christopher J.	Review and respond to question regarding percentage of memory care residents.	\$870	0.2		\$174.00								
	10/7/2020 Healey, Christopher J.	Correspondence regarding video depositions.	\$870	0.2		\$174.00								
	10/7/2020 Healey, Christopher J.	Telephone conference with Jacques Palette regarding same.	\$870	0.1		\$87.00								
	10/7/2020 Healey, Christopher J.	Prepare correspondence to team regarding Berry deposition preparation.	\$870	0.1		\$87.00								
	10/7/2020 Healey, Christopher J.	Prepare correspondence regarding Musoke preparation.	\$870	0.2		\$174.00								
	10/7/2020 Healey, Christopher J.	Correspondence regarding Watermark time studies.	\$870	0.2		\$174.00								
	10/7/2020 Healey, Christopher J.	Revise opposition to Flores motion to strike.	\$870	2		\$1,740.00								
	10/7/2020 Healey, Christopher J.	Outline arguments regarding class reply.	\$870	0.2		\$174.00								
	10/7/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding experts.	\$870	0.7		\$609.00								
	10/7/2020 Healey, Christopher J.	Correspondence regarding witness interviews.	\$870	0.1		\$87.00								
	10/7/2020 Healey, Christopher J.	Correspondence regarding expert deposition preparation.	\$870	0.1		\$87.00								
	10/7/2020 Healey, Christopher J.	Outline analysis regarding Crandall/Lewin issues.	\$870	0.2		\$174.00								
	10/7/2020 Healey, Christopher J.	Outline key Berry questions.	\$870	0.2		\$174.00								
	10/7/2020 Ross, Rachel L.	Legal research regarding the ability to use discovery materials subject to protective order in a separate litigation	\$405	3		\$1,215.00	3	1215						

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	10/8/2020 Healey, Christopher J.	Correspondence regarding Watermark witness interview.	\$870	1		\$870.00								
	10/8/2020 Healey, Christopher J.	Prepare correspondence regarding Ward deposition.	\$870	0.1		\$87.00								
	10/8/2020 Healey, Christopher J.	Review reply brief on leave to amend motion and comment regarding same.	\$870	0.5		\$435.00								
	10/8/2020 Healey, Christopher J.	Review letter regarding remote deposition protocol.	\$870	0.1		\$87.00								
	10/8/2020 Healey, Christopher J.	Correspondence regarding deposition correspondence regarding new proposed plaintiffs.	\$870	0.1		\$87.00								
	10/8/2020 Healey, Christopher J.	Outline Berry deposition preparation.	\$870	0.8		\$696.00								
	10/8/2020 Healey, Christopher J.	Prepare for Attorney Marks' call.	\$870	0.3		\$261.00								
	10/8/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding expert deposition and staffing issues.	\$870	1.4		\$1,218.00								
	10/8/2020 Healey, Christopher J.	Correspondence regarding Berry deposition preparation.	\$870	0.2		\$174.00								
	10/8/2020 Healey, Christopher J.	Correspondence regarding reply brief extension.	\$870	0.3		\$261.00								
	10/8/2020 Healey, Christopher J.	Review updated staffing spreadsheet.	\$870	0.2		\$174.00								
	10/8/2020 Healey, Christopher J.	Correspondence regarding deposition exhibit index.	\$870	0.2		\$174.00								
	10/8/2020 Healey, Christopher J.	Prepare correspondence to team regarding financial documents.	\$870	0.2		\$174.00								
	10/8/2020 Healey, Christopher J.	Draft interrogatory on the ISP data issue and prepare correspondence to team.	\$870	0.2		\$174.00								
	10/8/2020 Myrick, Tracy R.	Search for and locate documents in preparation for Ward's deposition per J. Thornton.	\$195	1.6		\$312.00								
	10/8/2020 Ross, Rachel L.	Draft summary of research to C. Healey regarding use of materials subject to protective order in collateral litigation	\$405	1		\$405.00	1	405						
	10/9/2020 Healey, Christopher J.	Outline deposition questions regarding Berry deposition (.6);	\$870	0.6		\$522.00								
	10/9/2020 Healey, Christopher J.	prepare correspondence regarding Flores recommendation issue.	\$870	0.1		\$87.00								
	10/9/2020 Healey, Christopher J.	Prepare correspondence regarding draft interrogatory on ISP.	\$870	0.1		\$87.00								
	10/9/2020 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding Berry deposition preparation.	\$870	0.1		\$87.00								
	10/9/2020 Healey, Christopher J.	Prepare correspondence to Attorney Warren regarding same.	\$870	0.1		\$87.00								
	10/9/2020 Healey, Christopher J.	Review file regarding Berry deposition preparation.	\$870	0.2		\$174.00								
	10/9/2020 Healey, Christopher J.	Prepare for Berry deposition meeting.	\$870	0.2		\$174.00								
	10/9/2020 Healey, Christopher J.	Follow-up correspondence regarding Berry deposition.	\$870	0.3		\$261.00								
	10/9/2020 Healey, Christopher J.	Correspondence regarding potential Sunrise witness interview.	\$870	0.1		\$87.00								
	10/9/2020 Healey, Christopher J.	Prepare for Watermark call.	\$870	0.3		\$261.00								
	10/9/2020 Healey, Christopher J.	Prepare for team call regarding Berry deposition.	\$870	0.6		\$522.00								
	10/9/2020 Healey, Christopher J.	Telephone conference with Watermark witness regarding assessment guidelines.	\$870	0.9		\$783.00								
	10/9/2020 Healey, Christopher J.	Correspondence regarding reply on leave to amend.	\$870	0.1		\$87.00								
	10/9/2020 Healey, Christopher J.	Telephone conference with team regarding Berry deposition preparation.	\$870	1.6		\$1,392.00			1.6	1,392.00				
	10/9/2020 Healey, Christopher J.	Review and comment on Attorney Johnson declaration regarding extension request.	\$870	0.2		\$174.00								
	10/9/2020 Healey, Christopher J.	Review correspondence regarding Berry deposition.	\$870	0.1		\$87.00								
	10/9/2020 Myrick, Tracy R.	Pull documents referenced in S. Warren email in preparation of Berry deposition.	\$195	2		\$390.00								
	10/9/2020 Myrick, Tracy R.	Download defendant productions and provide caseteam link to location.	\$195	0.6		\$117.00								
	10/10/2020 Healey, Christopher J.	Document review regarding Berry deposition preparation.	\$870	0.6		\$522.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>		
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>
	10/10/2020 Healey, Christopher J.	Correspondence regarding same.	\$870	0.3		\$261.00							
	10/10/2020 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding questions for contact.	\$870	0.4		\$348.00							
	10/10/2020 Healey, Christopher J.	Correspondence regarding Berry deposition scheduling.	\$870	0.2		\$174.00							
	10/10/2020 Healey, Christopher J.	Prepare correspondence regarding ED bonus issue.	\$870	0.2		\$174.00							
	10/10/2020 Healey, Christopher J.	Report regarding Watermark witness interview.	\$870	0.4		\$348.00							
	10/10/2020 Healey, Christopher J.	Prepare correspondence to Attorney Thamer regarding ED turnover question.	\$870	0.2		\$174.00							
	10/10/2020 Healey, Christopher J.	Review and respond to report on discovery meet and confer.	\$870	0.5		\$435.00							
	10/10/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding Ward deposition preparation.	\$870	0.4		\$348.00							
	10/10/2020 Myrick, Tracy R.	Pull additional exhibit and provide to caseteam in preparation of Berry deposition.	\$195	0.1		\$19.50							
	10/10/2020 Myrick, Tracy R.	Prepare encrypted zip file of Berry Deposition prep and send to caseteam via Accellion	\$195	0.3		\$58.50							
	10/12/2020 Healey, Christopher J.	Review correspondence regarding Berry deposition preparation.	\$870	0.2		\$174.00							
	10/12/2020 Healey, Christopher J.	Prepare correspondence to team regarding Attorney Stebner interview and Action Plans.	\$870	0.7		\$609.00							
	10/12/2020 Healey, Christopher J.	Prepare for call regarding Musoke deposition and correspondence regarding same.	\$870	0.6		\$522.00							
	10/12/2020 Healey, Christopher J.	Telephone conference with team regarding Musoke deposition.	\$870	0.8		\$696.00		0.8	696.00				
	10/12/2020 Healey, Christopher J.	Prepare for discovery call.	\$870	0.2		\$174.00							
	10/12/2020 Healey, Christopher J.	Telephone conference with Attorneys Johnson and Umpierre regarding motion to compel discovery.	\$870	0.7		\$609.00							
	10/12/2020 Healey, Christopher J.	Correspondence regarding Berry deposition.	\$870	0.1		\$87.00							
	10/12/2020 Healey, Christopher J.	Review correspondence regarding Berry background.	\$870	0.1		\$87.00							
	10/12/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding witness interview.	\$870	0.2		\$174.00							
	10/12/2020 Myrick, Tracy R.	Download defendant expert witness Edna Musoke production and provide caseteam link to location.	\$195	0.2		\$39.00							
	10/12/2020 Myrick, Tracy R.	Forward Berry deposition prep zip file to Toni Reo per S. Warren.	\$195	0.1		\$19.50							
	10/12/2020 Valero, Carmen A.	Research public records and background on Tom Berry, for C. Healey.	\$360	0.5		\$180.00							
	10/13/2020 Healey, Christopher J.	Prepare correspondence to Kennedy's office regarding word statistic analysis.	\$870	0.2		\$174.00							
	10/13/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding word analysis.	\$870	0.1		\$87.00							
	10/13/2020 Healey, Christopher J.	Review and respond to correspondence regarding pay rates.	\$870	0.1		\$87.00							
	10/13/2020 Healey, Christopher J.	Review and revise interrogatories.	\$870	0.2		\$174.00							
	10/13/2020 Healey, Christopher J.	Prepare correspondence regarding staffing data meet and confer.	\$870	0.1		\$87.00							
	10/13/2020 Healey, Christopher J.	Prepare correspondence regarding all hands on declarations documents.	\$870	0.2		\$174.00							
	10/13/2020 Healey, Christopher J.	Review key documents.	\$870	0.1		\$87.00							
	10/13/2020 Healey, Christopher J.	Follow-up correspondence regarding interrogatories, set 3.	\$870	0.1		\$87.00							
	10/13/2020 Healey, Christopher J.	Review and respond regarding discovery meet and confer.	\$870	0.2		\$174.00							
	10/13/2020 Healey, Christopher J.	Prepare correspondence to team regarding key documents on discretion and targets.	\$870	0.9		\$783.00							

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	10/13/2020 Healey, Christopher J.	Review and respond to correspondence regarding key documents.	\$870	0.1		\$87.00									
	10/13/2020 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding meet and confer letter regarding ESI custodians.	\$870	0.2		\$174.00									
	10/13/2020 Healey, Christopher J.	Prepare correspondence to team regarding Sara Dillon discretion document.	\$870	0.2		\$174.00									
	10/13/2020 Healey, Christopher J.	Follow-up correspondence regarding Dillon discretion document.	\$870	0.1		\$87.00									
	10/13/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Ward deposition preparation.	\$870	0.5		\$435.00									
	10/13/2020 Healey, Christopher J.	Prepare summary of pay rates.	\$870	0.3		\$261.00	0.3	261.00							
	10/13/2020 Healey, Christopher J.	Prepare to-do correspondence regarding class reply brief.	\$870	0.1		\$87.00									
	10/14/2020 Healey, Christopher J.	Prepare correspondence to Pat Kennedy regarding Ward analysis.	\$870	0.1		\$87.00									
	10/14/2020 Healey, Christopher J.	Telephone conference with Pat Kennedy regarding Ward analysis.	\$870	0.5		\$435.00									
	10/14/2020 Healey, Christopher J.	Review correspondence regarding contract labor.	\$870	0.1		\$87.00									
	10/14/2020 Healey, Christopher J.	Response regarding same.	\$870	0.1		\$87.00									
	10/14/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding statistical analysis.	\$870	0.4		\$348.00									
	10/14/2020 Healey, Christopher J.	Prepare correspondence regarding deposition scheduling.	\$870	0.1		\$87.00									
	10/14/2020 Healey, Christopher J.	Prepare correspondence regarding Jonathan Walker background.	\$870	0.1		\$87.00									
	10/14/2020 Myrick, Tracy R.	Download defendant overlay production and provide link to caseteam.	\$195	0.2		\$39.00									
	10/14/2020 Myrick, Tracy R.	Update production log.	\$195	0.3		\$58.50									
	10/15/2020 Healey, Christopher J.	Review correspondence regarding discovery schedule.	\$870	0.1		\$87.00									
	10/15/2020 Healey, Christopher J.	Review deposition schedule and correspondence regarding same.	\$870	0.1		\$87.00									
	10/15/2020 Healey, Christopher J.	Prepare correspondence regarding Ward deposition objections.	\$870	0.1		\$87.00									
	10/15/2020 Healey, Christopher J.	Review schedule regarding Peter Falkenberg's notice to compel arbitration.	\$870	0.1		\$87.00						0.1	87.00		
	10/15/2020 Healey, Christopher J.	Draft opposition to Dale Schroyer's motion to strike.	\$870	1.9		\$1,653.00									
	10/15/2020 Healey, Christopher J.	Prepare correspondence to Carmen Valero regarding expert background check.	\$870	0.1		\$87.00									
	10/15/2020 Healey, Christopher J.	Further drafting opposition to Dale Schroyer's motion to strike.	\$870	1.6		\$1,392.00									
	10/15/2020 Healey, Christopher J.	Prepare correspondence to Arns' office regarding declarant depositions.	\$870	0.1		\$87.00									
	10/15/2020 Healey, Christopher J.	Correspondence regarding Ward deposition summary.	\$870	0.2		\$174.00									
	10/15/2020 Healey, Christopher J.	Prepare correspondence regarding expert deposition question regarding all opinions.	\$870	0.1		\$87.00									
	10/15/2020 Healey, Christopher J.	Correspondence regarding RealPage inquiry.	\$870	0.1		\$87.00									
	10/15/2020 Healey, Christopher J.	Follow-up correspondence regarding Ward testimony and staffing analysis.	\$870	0.2		\$174.00									
	10/15/2020 Healey, Christopher J.	Outline key facts summary.	\$870	0.1		\$87.00									
	10/15/2020 Myrick, Tracy R.	Download expert witness Robert Crandall production and provide caseteam link to location.	\$195	0.2		\$39.00									
	10/15/2020 Valero, Carmen A.	Research background and testimony experience of expert witness Jonathan Walker, for C. Healey.	\$360	1		\$360.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	10/15/2020 Valero, Carmen A.	Research background and testimony experience of expert witnesses Robert Crandall and Edna Musoke, for C. Healey.	\$360	1		\$360.00									
	10/16/2020 Healey, Christopher J.	Correspondence regarding expert depositions and expert background information.	\$870	0.1		\$87.00									
	10/16/2020 Healey, Christopher J.	Correspondence regarding RealPage data.	\$870	0.1		\$87.00									
	10/16/2020 Healey, Christopher J.	Revise Dale Schroyer's motion to strike opposition.	\$870	0.2		\$174.00									
	10/16/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding expert analysis and related issues.	\$870	0.6		\$522.00									
	10/16/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Ward deposition costs.	\$870	0.1		\$87.00									
	10/16/2020 Healey, Christopher J.	Prepare correspondence to Tony Chicotel regarding Watermark time studies.	\$870	0.1		\$87.00									
	10/16/2020 Healey, Christopher J.	Review updated staffing analysis and prepare correspondence regarding same.	\$870	0.2		\$174.00									
	10/16/2020 Healey, Christopher J.	Review Gibson Dunn's response regarding staffing data and prepare correspondence regarding same.	\$870	0.2		\$174.00									
	10/16/2020 Healey, Christopher J.	Revise correspondence regarding expert costs.	\$870	0.1		\$87.00									
	10/16/2020 Healey, Christopher J.	Prepare correspondence to Attorney Ross regarding research help on Dale Schroyer's motion to strike.	\$870	0.2		\$174.00		0.2	174						
	10/16/2020 Healey, Christopher J.	Prepare correspondence to Patrick Kennedy regarding data analysis.	\$870	0.1		\$87.00									
	10/16/2020 Healey, Christopher J.	Outline key points for Crandall deposition.	\$870	0.7		\$609.00									
	10/16/2020 Healey, Christopher J.	Prepare correspondence regarding deposition exhibit numbers.	\$870	0.1		\$87.00									
	10/16/2020 Healey, Christopher J.	Prepare correspondence regarding staff depositions.	\$870	0.1		\$87.00									
	10/17/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding staffing numbers on Sunnyvale and Beverly Hills facilities.	\$870	0.2		\$174.00									
	10/17/2020 Healey, Christopher J.	Correspondence with Attorney Arns regarding staff depositions.	\$870	0.1		\$87.00									
	10/17/2020 Healey, Christopher J.	Outline revisions to class reply brief.	\$870	0.2		\$174.00									
	10/17/2020 Healey, Christopher J.	Prepare correspondence regarding Musoke deposition preparation.	\$870	0.1		\$87.00									
	10/17/2020 Healey, Christopher J.	Prepare correspondence regarding deposition procedures.	\$870	0.1		\$87.00									
	10/17/2020 Healey, Christopher J.	Prepare correspondence regard Tom Berry deposition preparation.	\$870	0.2		\$174.00									
	10/17/2020 Healey, Christopher J.	Review correspondence regarding Crandall deposition questions.	\$870	0.1		\$87.00									
	10/18/2020 Healey, Christopher J.	Outline supplemental Healey declaration in support of class certification reply.	\$870	0.1		\$87.00									
	10/18/2020 Healey, Christopher J.	Review defendants' motion to strike Kennedy declaration.	\$870	1.1		\$957.00									
	10/18/2020 Healey, Christopher J.	Review Walker declaration and outline deposition areas.	\$870	0.5		\$435.00									
	10/18/2020 Healey, Christopher J.	Outline opposition to motion to strike Kennedy declaration.	\$870	1.2		\$1,044.00									
	10/18/2020 Healey, Christopher J.	Prepare correspondence to team regarding Berry deposition.	\$870	0.1		\$87.00									
	10/19/2020 Healey, Christopher J.	Correspondence with Patrick Kennedy regarding follow-up analysis.	\$870	0.1		\$87.00									
	10/19/2020 Healey, Christopher J.	Research and analysis regarding Sunrise's motion to strike Kennedy declaration.	\$870	0.7		\$609.00									
	10/19/2020 Healey, Christopher J.	Telephone conference with Patrick Kennedy regarding staffing data and Walker deposition.	\$870	0.5		\$435.00									
	10/19/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding staffing analysis.	\$870	0.5		\$435.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	10/19/2020 Healey, Christopher J.	Prepare correspondence regarding class reply declaration.	\$870	0.2		\$174.00									
	10/19/2020 Healey, Christopher J.	Telephone conference with Attorney Needham regarding Musoke deposition.	\$870	0.2		\$174.00									
	10/19/2020 Healey, Christopher J.	Telephone conference with Attorney Needham's office regarding same.	\$870	0.1		\$87.00									
	10/19/2020 Healey, Christopher J.	Prepare correspondence regarding coordinator depositions.	\$870	0.2		\$174.00									
	10/19/2020 Healey, Christopher J.	Review correspondence regarding discovery motion.	\$870	0.1		\$87.00									
	10/19/2020 Healey, Christopher J.	Prepare correspondence regarding Crandall connection with Aegis.	\$870	0.2		\$174.00									
	10/19/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding San Rafael cut-off timing.	\$870	0.2		\$174.00									
	10/19/2020 Healey, Christopher J.	Correspondence regarding electronic assignment sheets.	\$870	0.1		\$87.00									
	10/20/2020 Healey, Christopher J.	Correspondence regarding Watermark issue.	\$870	6.4		\$5,568.00									
	10/20/2020 Healey, Christopher J.	Prepare correspondence to Patrick Kennedy regarding Walker deposition preparation.	\$870	0.1		\$87.00									
	10/20/2020 Healey, Christopher J.	Correspondence with Attorney Yarnell regarding peace of mind documents.	\$870	0.1		\$87.00									
	10/20/2020 Healey, Christopher J.	Review Musoke deposition summary.	\$870	0.1		\$87.00									
	10/20/2020 Healey, Christopher J.	Outline response to motion to strike Kennedy declaration.	\$870	2.4		\$2,088.00									
	10/20/2020 Healey, Christopher J.	Review email regarding peace of mind documents.	\$870	0.1		\$87.00									
	10/20/2020 Healey, Christopher J.	Prepare correspondence regarding discovery briefing.	\$870	0.1		\$87.00									
	10/20/2020 Healey, Christopher J.	Correspondence regarding discovery motion.	\$870	0.1		\$87.00									
	10/20/2020 Healey, Christopher J.	Further outline response to motion to strike Kennedy declaration.	\$870	2.7		\$2,349.00									
	10/20/2020 Healey, Christopher J.	Prepare for call regarding Watermark discovery.	\$870	0.1		\$87.00									
	10/20/2020 Healey, Christopher J.	Telephone conference regarding Watermark discovery issue.	\$870	0.2		\$174.00									
	10/20/2020 Healey, Christopher J.	Prepare correspondence regarding same.	\$870	0.1		\$87.00									
	10/20/2020 Healey, Christopher J.	Correspondence regarding Crandall deposition.	\$870	0.2		\$174.00									
	10/20/2020 Healey, Christopher J.	Update production log regarding defendant expert production; edit production log regarding Defendant Productions added to Relativity.	\$870	0.2		\$174.00									
	10/20/2020 Myrick, Tracy R.		\$195	0.2		\$39.00									
	10/20/2020 Myrick, Tracy R.		\$195	0.1		\$19.50									
	10/21/2020 Healey, Christopher J.	Outline response to Patrick Kennedy motion to strike.	\$870	4.2		\$3,654.00		1	870.00						
	10/21/2020 Healey, Christopher J.	Correspondence regarding Berry deposition.	\$870	0.1		\$87.00									
	10/21/2020 Healey, Christopher J.	Correspondence with Attorney Warren regarding Walker deposition preparation.	\$870	0.6		\$522.00									
	10/21/2020 Healey, Christopher J.	Prepare for Walker deposition.	\$870	0.4		\$348.00									
	10/21/2020 Healey, Christopher J.	Correspondence regarding Crandall deposition preparation.	\$870	0.2		\$174.00									
	10/21/2020 Healey, Christopher J.	Correspondence regarding Watermark documentation.	\$870	0.1		\$87.00									
	10/21/2020 Healey, Christopher J.	Telephone conferences with Attorney Marks regarding Crandall preparation.	\$870	0.2		\$174.00									
	10/21/2020 Healey, Christopher J.	Prepare correspondence regarding Watermark subpoena.	\$870	0.1		\$87.00									
	10/21/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding Crandall deposition preparation.	\$870	0.2		\$174.00									
	10/21/2020 Healey, Christopher J.	Prepare correspondence to Attorney Arns regarding deposition coverage.	\$870	0.1		\$87.00									
	10/22/2020 Healey, Christopher J.	Outline opposition to Patrick Kennedy's motion to strike.	\$870	5		\$4,350.00									
	10/22/2020 Healey, Christopher J.	Update Pulaski analysis.	\$870	0.3		\$261.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>		
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>
		Prepare correspondence to Attorney Umpierre regarding Watermark subpoena.	\$870	0.1		\$87.00							
		Review and revise Watermark subpoena request.	\$870	0.2		\$174.00							
		Correspondence regarding Crandall deposition.	\$870	0.1		\$87.00							
		Outline Walker deposition preparation/questions.	\$870	0.3		\$261.00							
		Prepare correspondence to team regarding deposition schedule.	\$870	0.1		\$87.00							
		Revise Watermark request and correspondence regarding same.	\$870	0.4		\$348.00							
		Correspondence regarding deposition scheduling.	\$870	0.2		\$174.00							
		Follow-up regarding same.	\$870	0.1		\$87.00							
		Review Attorney Marks' analysis of coordinator hours.	\$870	0.1		\$87.00							
		Prepare for Patrick Kennedy call regarding deposition questions.	\$870	0.2		\$174.00							
		Telephone conference with Patrick Kennedy regarding deposition questions for Sunrise damages expert.	\$870	1.1		\$957.00							
		Prepare correspondence to Attorney Marks regarding potential Patrick Kennedy supplemental declaration.	\$870	0.2		\$174.00							
		Review Gibson's email regarding Watermark document.	\$870	0.1		\$87.00							
		Prepare correspondence to team regarding Gibson's objections to Watermark document.	\$870	0.3		\$261.00							
		Review and comment regarding Crandall deposition and potential motion to strike Crandall.	\$870	0.5		\$435.00							
		Correspondence regarding outstanding expert invoices and payment regarding same.	\$870	0.4		\$348.00							
		Follow-up correspondence regarding Walker deposition preparation.	\$870	0.3		\$261.00							
		Download defendant expert witness production and provide caseteam link to location.	\$195	0.3		\$58.50							
		Correspondence with Attorney Wallace regarding expert deposition preparation.	\$870	0.1		\$87.00							
		Prepare correspondence regarding Berry deposition questions.	\$870	0.2		\$174.00							
		Telephone conference with Attorney Stebner regarding settlement issues and mediation preparation.	\$870	0.2		\$174.00							
		Prepare correspondence to Attorney Stebner regarding mediation preparation.	\$870	0.3		\$261.00							
		Prepare correspondence to Attorney Kawamoto regarding mediation preparation.	\$870	0.1		\$87.00							
		Prepare correspondence to Attorney Umpierre regarding POA issue.	\$870	0.1		\$87.00							
		Prepare for Walker deposition and review Walker produced materials.	\$870	1		\$870.00							
		Research and analysis regarding defendants' risk of harm arguments.	\$870	0.5		\$435.00							
		Outline argument regarding same.	\$870	0.2		\$174.00							
		Prepare correspondence to Attorney Stebner regarding mediation status.	\$870	0.1		\$87.00							
		Conduct research to locate cases/secondary source material on the risk that a seller will not provide promised services, either of the same quality or quantity as promised in a contract, constitutes legal or economic harm. Request made by C. Healey.	\$325	1.9		\$617.50	1.9	617.5					
		Prepare for Jonathan Walker deposition.	\$870	4.9		\$4,263.00	1	870.00					

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	10/26/2020 Healey, Christopher J.	Review correspondence regarding Watermark discovery.	\$870	0.1		\$87.00								
	10/26/2020 Healey, Christopher J.	Correspondence with library staff regarding Carlton article.	\$870	0.2		\$174.00								
	10/26/2020 Healey, Christopher J.	Correspondence regarding Sunrise's request to extend discovery brief.	\$870	0.1		\$87.00								
	10/26/2020 Healey, Christopher J.	Review Attorney Marks' correspondence regarding Sunrise understaffing issues.	\$870	0.1		\$87.00								
	10/26/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding updated staffing analysis.	\$870	0.9		\$783.00								
	10/26/2020 Healey, Christopher J.	Research regarding measure of Danoff cases.	\$870	0.5		\$435.00								
	10/26/2020 Healey, Christopher J.	Correspondence regarding Jonathan Walker deposition.	\$870	0.2		\$174.00								
	10/26/2020 Valero, Carmen A.	Research and retrieve 3 economic articles, for C. Healey.	\$360	0.1		\$36.00								
	10/27/2020 Ciziunas, Mary K.	Conduct research to locate cases/secondary source material on the risk that a seller will not provide promised services, either of the same quality or quantity as promised in a contract, constitutes legal or economic harm. Request made by C. Healey.	\$325	3.3		\$1,072.50	3.3	1072.5						
	10/27/2020 Healey, Christopher J.	Prepare for Jonathan Walker deposition.	\$870	1		\$870.00								
	10/27/2020 Healey, Christopher J.	Review law review articles regarding credence.	\$870	0.5		\$435.00								
	10/27/2020 Healey, Christopher J.	Review proposed questions from Patrick Kennedy's office.	\$870	0.3		\$261.00								
	10/27/2020 Healey, Christopher J.	Further deposition preparation for Jonathan Walker deposition.	\$870	2.4		\$2,088.00								
	10/27/2020 Healey, Christopher J.	Prepare correspondence to team regarding Walker deposition exhibits.	\$870	0.2		\$174.00								
	10/27/2020 Healey, Christopher J.	Prepare correspondence regarding Walker documents reviewed.	\$870	0.1		\$87.00								
	10/27/2020 Healey, Christopher J.	Follow-up correspondence regarding Walker deposition exhibits and preparation.	\$870	0.3		\$261.00								
	10/27/2020 Healey, Christopher J.	Outline to-do list regarding Walker deposition, other discovery issues.	\$870	0.2		\$174.00								
	10/27/2020 Myrick, Tracy R.	Pull various documents and exhibits in preparation of Walker deposition per C. Healey.	\$195	1.5		\$292.50								
	10/28/2020 Healey, Christopher J.	Conference regarding Walker deposition exhibits.	\$870	0.3		\$261.00								
	10/28/2020 Healey, Christopher J.	Prepare for Walker deposition.	\$870	0.2		\$174.00								
	10/28/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Walker deposition preparation.	\$870	0.1		\$87.00								
	10/28/2020 Healey, Christopher J.	Correspondence regarding Walker deposition exhibits.	\$870	0.1		\$87.00								
	10/28/2020 Healey, Christopher J.	Further preparation for Walker deposition.	\$870	0.2		\$174.00								
	10/28/2020 Healey, Christopher J.	Review proposed deposition questions from Attorney Warren.	\$870	0.1		\$87.00								
	10/28/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding damage model.	\$870	0.3		\$261.00								
	10/28/2020 Healey, Christopher J.	Continue preparation for Walker deposition and outline questions.	\$870	1.4		\$1,218.00								
	10/28/2020 Healey, Christopher J.	Walker deposition preparation and review documents Walker relied upon.	\$870	1		\$870.00								
	10/28/2020 Healey, Christopher J.	Research regarding economics analysis and related issues.	\$870	1		\$870.00								
	10/28/2020 Myrick, Tracy R.	Send follow-up email to R. Bonner regarding overlay in Relativity.	\$195	0.1		\$19.50								
	10/28/2020 Myrick, Tracy R.	Work on re-organizing Walker potential depo exhibits and copy to office services shared drive.	\$195	0.5		\$97.50								
	10/28/2020 Myrick, Tracy R.	Download deposition video of Edna Musoke.	\$195	0.3		\$58.50								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	10/28/2020 Ross, Rachel L.	Legal research of circuit decisions holding that Rule 26(a)(2) does not apply to experts at the class certification level	\$405	0.7	\$283.50	0.7	283.5						
	10/29/2020 Healey, Christopher J.	Outline deposition questions for Jonathan Walker.	\$870	0.2	\$174.00								
	10/29/2020 Healey, Christopher J.	Review and analyze damage calculations articles.	\$870	0.2	\$174.00								
	10/29/2020 Healey, Christopher J.	Prepare for Ward deposition.	\$870	2.2	\$1,914.00								
	10/29/2020 Healey, Christopher J.	Prepare correspondence to Kennedy's office regarding econometric analysis requirement.	\$870	0.1	\$87.00								
	10/29/2020 Healey, Christopher J.	Telephone conference with Attorney Warren regarding Jonathan Walker deposition.	\$870	0.4	\$348.00								
	10/29/2020 Healey, Christopher J.	Prepare for Jonathan Walker deposition.	\$870	2.6	\$2,262.00								
	10/29/2020 Healey, Christopher J.	Prepare correspondence to Attorney Warren regarding Walker deposition questions and objections.	\$870	0.2	\$174.00								
	10/29/2020 Myrick, Tracy R.	Provide updated staff spreadsheet to S. Warren per caseteam.	\$195	0.1	\$19.50								
	10/29/2020 Myrick, Tracy R.	Gather additional materials in preparation of J. Walker deposition and provide to S. Warren per C. Healey.	\$195	0.3	\$58.50								
	10/29/2020 Myrick, Tracy R.	Prepare zip file of exhibits pulled in preparation of J. Walker deposition for Court Reporter's use per caseteam.	\$195	0.2	\$39.00								
	10/30/2020 Healey, Christopher J.	Prepare for Jonathan Walker deposition.	\$870	1.5	\$1,305.00								
	10/30/2020 Healey, Christopher J.	Take Jonathan Walker deposition.	\$870	5.2	\$4,524.00								
	10/30/2020 Healey, Christopher J.	Prepare correspondence to Patrick Kennedy's office regarding staffing call.	\$870	0.1	\$87.00								
	10/30/2020 Healey, Christopher J.	Correspondence regarding deposition coverage.	\$870	0.1	\$87.00								
	10/30/2020 Healey, Christopher J.	Outline summary of Jonathan Walker deposition.	\$870	0.1	\$87.00								
	10/30/2020 Myrick, Tracy R.	Verify E. Musoke deposition video and provide caseteam link to location.	\$195	0.3	\$58.50								
	10/30/2020 Myrick, Tracy R.	Upload multiple client productions to shared drive and provide caseteam links to location.	\$195	1.1	\$214.50								
	10/30/2020 Ross, Rachel L.	Legal research regarding the applicability of FRCP 26(a)(2) to experts at class certification stage	\$405	2.5	\$1,012.50	2.5	1012.5						
	10/31/2020 Myrick, Tracy R.	Download defendant production and provide caseteam with link to location.	\$195	0.5	\$97.50								
	11/2/2020 Healey, Christopher J.	Outline to-do list regarding class reply brief.	\$870	0.2	\$174.00								
	11/2/2020 Healey, Christopher J.	Outline preparation for Kelly deposition.	\$870	1.6	\$1,392.00								
	11/2/2020 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding task times.	\$870	0.1	\$87.00								
	11/2/2020 Healey, Christopher J.	Review Gibson correspondence regarding Lacey/Gilder depositions.	\$870	0.1	\$87.00								
	11/2/2020 Healey, Christopher J.	Review Watermark subpoena and response regarding same.	\$870	0.2	\$174.00								
	11/2/2020 Healey, Christopher J.	Review discovery referee invoice and correspondence regarding same.	\$870	0.1	\$87.00								
	11/2/2020 Healey, Christopher J.	Review Sunrise documents from Production 36.	\$870	0.5	\$435.00								
	11/2/2020 Healey, Christopher J.	Prepare to-do list regarding class reply brief.	\$870	0.5	\$435.00								
	11/2/2020 Healey, Christopher J.	Revise class reply brief.	\$870	2.2	\$1,914.00								
	11/2/2020 Healey, Christopher J.	Prepare correspondence to team regarding Sunrise staff depositions.	\$870	0.3	\$261.00								
	11/2/2020 Healey, Christopher J.	Correspondence regarding Watermark subpoena.	\$870	0.2	\$174.00								
	11/2/2020 Healey, Christopher J.	Correspondence regarding discovery motion supplemental brief.	\$870	0.1	\$87.00								
	11/2/2020 Myrick, Tracy R.	Update production log to reflect recently received Plaintiff and Defendant productions.	\$195	0.6	\$117.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	11/3/2020 Healey, Christopher J.	Correspondence regarding depositions of Sunrise staff.	\$870	0.1		\$87.00									
	11/3/2020 Healey, Christopher J.	Review and comment on supplemental brief.	\$870	1.5		\$1,305.00									
	11/3/2020 Healey, Christopher J.	Correspondence regarding same.	\$870	0.2		\$174.00									
	11/3/2020 Healey, Christopher J.	Review and comment regarding Watermark subpoena.	\$870	0.1		\$87.00									
	11/3/2020 Healey, Christopher J.	Prepare for Patrick Kennedy call.	\$870	0.5		\$435.00									
	11/3/2020 Healey, Christopher J.	Conference with Patrick Kennedy regarding new Sunrise data.	\$870	1.2		\$1,044.00									
	11/3/2020 Healey, Christopher J.	Telephone conference with Jim Thornton regarding Sunrise's response to Flores analysis.	\$870	0.5		\$435.00									
	11/3/2020 Healey, Christopher J.	Review Apolinario deposition testimony on care partners and correspondence regarding same.	\$870	0.2		\$174.00									
	11/3/2020 Healey, Christopher J.	Review correspondence regarding care partners.	\$870	0.1		\$87.00									
	11/3/2020 Healey, Christopher J.	Prepare correspondence to Jim Thornton regarding Slichta declaration and changes to assessment scoring matrix.	\$870	0.5		\$435.00									
	11/3/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding six sample facilities agreements.	\$870	0.2		\$174.00									
	11/3/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$870	0.4		\$348.00									
	11/3/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding Real Page proposal.	\$870	0.1		\$87.00									
	11/3/2020 Healey, Christopher J.	Correspondence with Attorney Needham regarding REM coordinator deposition and file review regarding same.	\$870	0.3		\$261.00									
	11/3/2020 Healey, Christopher J.	Revise supplemental discovery brief.	\$870	0.4		\$348.00									
	11/3/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00									
	11/3/2020 Myrick, Tracy R.	Circulate SUN0095532 - SUN0095561 to Timothy Needham, Megan Yarnall, Brian Umpierre, and William Stein per C. Healey.	\$195	0.2		\$39.00									
	11/4/2020 Healey, Christopher J.	Revise reply brief regarding class certification.	\$870	5.1		\$4,437.00									
	11/4/2020 Healey, Christopher J.	Prepare correspondence to team regarding deposition preparation issues.	\$870	0.8		\$696.00									
	11/4/2020 Healey, Christopher J.	Correspondence regarding discovery reply brief.	\$870	0.1		\$87.00									
	11/4/2020 Healey, Christopher J.	Correspondence with Stebner's office regarding Beverly Hills budget document.	\$870	0.1		\$87.00									
	11/4/2020 Healey, Christopher J.	Further revision to class reply brief.	\$870	0.4		\$348.00									
	11/4/2020 Healey, Christopher J.	Correspondence regarding Malone deposition.	\$870	0.1		\$87.00									
	11/5/2020 Healey, Christopher J.	Correspondence regarding mediation preparation.	\$870	0.1		\$87.00									
	11/5/2020 Healey, Christopher J.	Revise class certification reply brief.	\$870	4.2		\$3,654.00									
	11/5/2020 Healey, Christopher J.	Correspondence regarding Berry deposition.	\$870	0.1		\$87.00									
	11/5/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding reply brief and discovery issues.	\$870	0.3		\$261.00									
	11/5/2020 Healey, Christopher J.	Correspondence with Attorney Needham regarding deposition preparation.	\$870	0.1		\$87.00									
	11/6/2020 Healey, Christopher J.	Revise class reply brief.	\$870	5.1		\$4,437.00		1	870.00						
	11/6/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding data analysis and discovery issues.	\$870	0.9		\$783.00									
	11/6/2020 Healey, Christopher J.	Follow-up correspondence with Attorney Marks regarding reply brief.	\$870	0.5		\$435.00									
	11/6/2020 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding Malone deposition.	\$870	0.7		\$609.00									
	11/7/2020 Healey, Christopher J.	Prepare correspondence regarding sample data agreement.	\$870	0.1		\$87.00									
	11/7/2020 Healey, Christopher J.	Review Attorney Marks' correspondence regarding defective Sunrise assessment production.	\$870	0.1		\$87.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	11/7/2020 Healey, Christopher J.	Revise class certification reply brief.	\$870	3.6		\$3,132.00								
	11/8/2020 Healey, Christopher J.	Revise class reply brief.	\$870	3.7		\$3,219.00	1	870.00						
	11/8/2020 Healey, Christopher J.	Prepare correspondence to team regarding updated draft.	\$870	0.2		\$174.00	1	870.00						
	11/9/2020 Healey, Christopher J.	Review Discovery Master ruling and prepare correspondence to team.	\$870	0.2		\$174.00								
	11/9/2020 Healey, Christopher J.	Review and revise correspondence regarding assessment data.	\$870	0.2		\$174.00								
	11/9/2020 Healey, Christopher J.	Correspondence regarding Malone deposition.	\$870	0.2		\$174.00								
	11/9/2020 Healey, Christopher J.	Correspondence regarding mediation.	\$870	0.1		\$87.00								
	11/9/2020 Healey, Christopher J.	Review and respond regarding Key Provisions chart.	\$870	0.2		\$174.00								
	11/9/2020 Healey, Christopher J.	Correspondence regarding expert costs.	\$870	0.2		\$174.00								
	11/9/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding reply and related issues.	\$870	0.4		\$348.00								
	11/9/2020 Healey, Christopher J.	Telephone conference with Attorney Arns regarding Berry deposition.	\$870	0.2		\$174.00								
	11/9/2020 Healey, Christopher J.	Review Berry deposition outline.	\$870	0.5		\$435.00								
	11/9/2020 Healey, Christopher J.	Response to Attorney Marks regarding 2014 assessment update.	\$870	0.2		\$174.00								
	11/9/2020 Healey, Christopher J.	Prepare correspondence to Attorney Arns regarding Berry deposition.	\$870	0.1		\$87.00								
	11/9/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Berry deposition and discovery ruling.	\$870	0.2		\$174.00								
	11/9/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding 2014 assessment issue.	\$870	0.2		\$174.00								
	11/9/2020 Healey, Christopher J.	Outline Berry deposition preparation.	\$870	1.4		\$1,218.00								
	11/9/2020 Healey, Christopher J.	Prepare correspondence regarding class reply brief filing.	\$870	0.3		\$261.00								
	11/9/2020 Healey, Christopher J.	Review Attorney Marks' analysis regarding 2014 assessment issue.	\$870	0.1		\$87.00								
	11/9/2020 Healey, Christopher J.	Correspondence regarding review and deposition preparation.	\$870	0.1		\$87.00								
	11/10/2020 Healey, Christopher J.	Correspondence with Attorney Stebner regarding Malone deposition.	\$870	0.2		\$174.00								
	11/10/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding Malone deposition preparation.	\$870	0.5		\$435.00								
	11/10/2020 Healey, Christopher J.	Correspondence with Gibson firm regarding Tom Berry deposition.	\$870	0.1		\$87.00								
	11/10/2020 Healey, Christopher J.	Prepare for Tom Berry deposition.	\$870	4		\$3,480.00								
	11/10/2020 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding 2014 assessment update.	\$870	0.2		\$174.00								
	11/10/2020 Healey, Christopher J.	Telephone conference with Attorney Warren regarding Tom Berry deposition.	\$870	0.1		\$87.00								
	11/10/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding deposition preparation.	\$870	0.3		\$261.00								
	11/10/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding proportionality issue.	\$870	0.2		\$174.00								
	11/10/2020 Healey, Christopher J.	Prepare correspondence regarding Tom Berry deposition.	\$870	0.1		\$87.00								
	11/10/2020 Healey, Christopher J.	Further preparation for Tom Berry deposition.	\$870	0.5		\$435.00								
	11/10/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding discovery hearing preparation.	\$870	0.2		\$174.00								
	11/10/2020 Healey, Christopher J.	Follow-up correspondence to Attorney Umpierre regarding same.	\$870	0.1		\$87.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	11/10/2020 Healey, Christopher J.	Prepare correspondence regarding discovery hearing preparation.	\$870	0.3									
	11/11/2020 Healey, Christopher J.	Prepare for Tom Berry deposition.	\$870	3.6	\$3,132.00								
	11/11/2020 Healey, Christopher J.	Correspondence regarding deposition transcripts.	\$870	0.1	\$87.00								
	11/11/2020 Healey, Christopher J.	Correspondence regarding CLM documentation.	\$870	0.1	\$87.00								
	11/11/2020 Healey, Christopher J.	Correspondence regarding Tom Berry deposition exhibits.	\$870	0.1	\$87.00								
	11/11/2020 Healey, Christopher J.	Continue preparing for Tom Berry deposition.	\$870	2.3	\$2,001.00								
	11/11/2020 Healey, Christopher J.	Prepare correspondence regarding ACHA documents.	\$870	0.1	\$87.00								
	11/11/2020 Healey, Christopher J.	Prepare correspondence regarding class reply and supplemental declaration.	\$870	0.1	\$87.00								
	11/11/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding Malone deposition.	\$870	0.3	\$261.00								
	11/11/2020 Myrick, Tracy R.	Provide R. Bonner replacement for SUN096632 to add to Relativity, review and qc file in Relativity.	\$195	0.4	\$78.00								
	11/11/2020 Myrick, Tracy R.	Work on pulling files in preparation of T. Berry deposition per C. Healey.	\$195	4	\$780.00								
	11/12/2020 Healey, Christopher J.	Correspondence regarding Falkenberg Rule 26 conference.	\$870	0.1	\$87.00								
	11/12/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding reply brief inserts.	\$870	0.1	\$87.00								
	11/12/2020 Healey, Christopher J.	Review Attorney Marks' correspondence regarding assessment points issue.	\$870	0.1	\$87.00								
	11/12/2020 Healey, Christopher J.	Prepare for Tom Berry deposition.	\$870	0.2	\$174.00								
	11/12/2020 Healey, Christopher J.	Draft insert regarding assessment points issue.	\$870	0.2	\$174.00								
	11/12/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding assessment points analysis.	\$870	0.3	\$261.00								
	11/12/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding Rule 26 conference for Falkenberg.	\$870	0.2	\$174.00								
	11/12/2020 Healey, Christopher J.	Revise class reply brief.	\$870	3.7	\$3,219.00								
	11/12/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding status and Tom Berry deposition.	\$870	0.3	\$261.00								
	11/12/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1	\$87.00								
	11/12/2020 Healey, Christopher J.	Correspondence regarding Sunrise's argument regarding charges to points system.	\$870	0.3	\$261.00								
	11/12/2020 Myrick, Tracy R.	Provide various T. Berry deposition materials to S. Warren via Accellion.	\$195	0.3	\$58.50								
	11/12/2020 Myrick, Tracy R.	Prepare zip file of all files pulled for Berry Depo for purposes of sending to court reporter per caseteam.	\$195	0.2	\$39.00								
	11/12/2020 Myrick, Tracy R.	Download J. Mulone deposition exhibits from B. Umpierre and provide caseteam link to location.	\$195	0.3	\$58.50								
	11/13/2020 Healey, Christopher J.	Revise class reply brief.	\$870	2.8	\$2,436.00								
	11/13/2020 Healey, Christopher J.	Correspondence regarding Berry deposition preparation.	\$870	0.1	\$87.00								
	11/13/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding class reply and related issues.	\$870	1	\$870.00								
	11/13/2020 Healey, Christopher J.	Review correspondence regarding Berry deposition preparation.	\$870	0.1	\$87.00								
	11/13/2020 Healey, Christopher J.	Review documents regarding Berry facilities.	\$870	0.2	\$174.00								
	11/13/2020 Healey, Christopher J.	Prepare for Berry deposition.	\$870	0.4	\$348.00								
	11/13/2020 Healey, Christopher J.	Telephone conference with Attorneys Marks and Wallace regarding response to Flores arguments in class reply.	\$870	0.6	\$522.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	11/13/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding resident rights language.	\$870	0.5	\$435.00								
	11/13/2020 Healey, Christopher J.	Review key provisions chart and defendants' filed exhibits.	\$870	1	\$870.00								
	11/13/2020 Healey, Christopher J.	Prepare correspondence to team regarding same and revised key provisions chart.	\$870	0.3	\$261.00								
	11/13/2020 Myrick, Tracy R.	Upload Jason Mulone final deposition transcript and exhibits to shared drive and provide caseteam link to location.	\$195	0.3	\$58.50								
	11/13/2020 Myrick, Tracy R.	Upload Edna Musoke deposition transcripts to shared drive and provide caseteam with link to location.	\$195	0.1	\$19.50								
	11/13/2020 Myrick, Tracy R.	Upload deposition transcripts for Gayle Kelly and provide caseteam link to location.	\$195	0.1	\$19.50								
	11/13/2020 Myrick, Tracy R.	Download Edna Musoke deposition exhibits and provide caseteam link to location.	\$195	0.7	\$136.50								
	11/13/2020 Myrick, Tracy R.	Update deposition log.	\$195	0.2	\$39.00								
	11/13/2020 Myrick, Tracy R.	Provide Key Provisions Chart as marked in C. Healey declaration to motion for class certification.	\$195	0.3	\$58.50								
	11/14/2020 Healey, Christopher J.	Prepare for Berry deposition.	\$870	2	\$1,740.00								
	11/14/2020 Healey, Christopher J.	Correspondence regarding AHCA awards.	\$870	0.1	\$87.00								
	11/15/2020 Healey, Christopher J.	Prepare for Berry deposition.	\$870	3.8	\$3,306.00								
	11/15/2020 Healey, Christopher J.	Correspondence regarding Berry deposition exhibits.	\$870	0.2	\$174.00								
	11/15/2020 Healey, Christopher J.	Prepare correspondence to Janssen firm regarding Musoke/Kelly deposition excerpts.	\$870	0.2	\$174.00								
	11/15/2020 Healey, Christopher J.	Review actual/target staffing numbers.	\$870	0.2	\$174.00								
	11/15/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$870	0.2	\$174.00								
	11/15/2020 Myrick, Tracy R.	Download SEHA Ver 4 from Relativity and provide to S. Warren via ftp in preparation of T. Berry deposition.	\$195	0.2	\$39.00								
	11/15/2020 Myrick, Tracy R.	Locate exhibit from defendant opposition to motion for class certification and provide to S. Warren in preparation of T. Berry deposition.	\$195	0.5	\$97.50								
	11/16/2020 Healey, Christopher J.	Prepare for Tom Berry deposition.	\$870	6.5	\$5,655.00								
	11/16/2020 Healey, Christopher J.	Review and comment regarding meet and confer letter.	\$870	0.7	\$609.00								
	11/16/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding reply brief.	\$870	0.2	\$174.00								
	11/16/2020 Healey, Christopher J.	Telephone conferences with Attorney Stebner regarding Berry deposition preparation.	\$870	0.5	\$435.00								
	11/16/2020 Healey, Christopher J.	Prepare correspondence to team regarding Tom Berry questions.	\$870	0.5	\$435.00								
	11/16/2020 Healey, Christopher J.	Further deposition preparation (Tom Berry).	\$870	0.8	\$696.00								
	11/16/2020 Myrick, Tracy R.	Download exhibits from opposition to motion for class certification and provide caseteam link to location.	\$195	0.2	\$39.00								
	11/16/2020 Myrick, Tracy R.	Convert additional exhibit in preparation for T. Berry deposition and provide to caseteam.	\$195	0.2	\$39.00								
	11/16/2020 Myrick, Tracy R.	Convert additional native exhibit to pdf and provide to caseteam in preparation of Berry deposition.	\$195	0.2	\$39.00								
	11/16/2020 Myrick, Tracy R.	Link exhibits to deposition transcript of Jason Malone and Edna Musoke and import into CaseNotebook database.	\$195	1	\$195.00								
	11/17/2020 Healey, Christopher J.	Tom Berry deposition preparation.	\$870	1	\$870.00								
	11/17/2020 Healey, Christopher J.	Take Tom Berry deposition.	\$870	6.5	\$5,655.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	11/17/2020 Healey, Christopher J.	Correspondence with Attorneys Wallace and Marks regarding reply brief.	\$870	0.2		\$174.00									
	11/17/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding case status and mediation.	\$870	0.2		\$174.00									
	11/17/2020 Myrick, Tracy R.	Download G. Kelly deposition exhibits; extract exhibits and provide caseteam with link to location.	\$195	0.5		\$97.50									
	11/17/2020 Myrick, Tracy R.	Review and locate email containing final version of Key Provisions Chart in excel per B. Umpierre.	\$195	0.5		\$97.50									
	11/17/2020 Myrick, Tracy R.	Link exhibits to deposition transcript of Gayle King and import into CaseNotebook database.	\$195	0.5		\$97.50									
	11/18/2020 Healey, Christopher J.	Review Tom Berry deposition notes.	\$870	0.5		\$435.00									
	11/18/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding reply brief and Tom Berry deposition.	\$870	0.2		\$174.00									
	11/18/2020 Healey, Christopher J.	Prepare correspondence to Attorney Warren regarding privilege claim.	\$870	0.1		\$87.00									
	11/18/2020 Healey, Christopher J.	Review correspondence from Marks' office regarding assessment scoring issue.	\$870	0.2		\$174.00									
	11/18/2020 Healey, Christopher J.	Review Tom Berry deposition testimony.	\$870	0.2		\$174.00									
	11/18/2020 Healey, Christopher J.	Draft inserts to class reply from record.	\$870	1.7		\$1,479.00									
	11/18/2020 Healey, Christopher J.	Prepare correspondence to Kennedy's office regarding assessment points issue.	\$870	0.2		\$174.00									
	11/18/2020 Healey, Christopher J.	Prepare correspondence to Marks' office regarding team call.	\$870	0.1		\$87.00									
	11/18/2020 Healey, Christopher J.	Review Attorney Marks' revisions to draft reply brief.	\$870	0.2		\$174.00									
	11/18/2020 Healey, Christopher J.	Outline reply arguments.	\$870	0.6		\$522.00									
	11/18/2020 Healey, Christopher J.	Telephone conference with team regarding draft reply brief.	\$870	0.8		\$696.00				0.8	696.00				
	11/18/2020 Healey, Christopher J.	Telephone conference with Patrick Kennedy regarding supplemental declaration.	\$870	0.6		\$522.00									
	11/18/2020 Healey, Christopher J.	Analysis regarding defendants' arguments regarding points change.	\$870	1.5		\$1,305.00									
	11/18/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding Sunrise discovery stonewalling.	\$870	0.1		\$87.00									
	11/18/2020 Healey, Christopher J.	Outline inserts regarding flaws analysis.	\$870	0.2		\$174.00									
	11/18/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding flows analysis.	\$870	0.5		\$435.00									
	11/18/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding meet and confer letter.	\$870	0.1		\$87.00									
	11/18/2020 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding reply brief.	\$870	0.1		\$87.00									
	11/18/2020 Myrick, Tracy R.	Update deposition log.	\$195	0.3		\$58.50									
	11/19/2020 Healey, Christopher J.	Prepare correspondence to Attorney Warren regarding Sunrise privilege claim.	\$870	0.1		\$87.00									
	11/19/2020 Healey, Christopher J.	Review Attorney Wallace's revisions to reply brief.	\$870	0.5		\$435.00									
	11/19/2020 Healey, Christopher J.	Conference regarding reply brief revisions.	\$870	0.1		\$87.00									
	11/19/2020 Healey, Christopher J.	Review Attorney Umpierre's revisions to key provisions chart.	\$870	0.1		\$87.00									
	11/19/2020 Healey, Christopher J.	Telephone conferences with Attorney Umpierre regarding key provisions exhibit and reply filing.	\$870	0.3		\$261.00									
	11/19/2020 Healey, Christopher J.	Revise reply brief.	\$870	3.4		\$2,958.00									
	11/19/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding reply brief.	\$870	0.3		\$261.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	11/19/2020 Healey, Christopher J.	Review update key provisions chart.	\$870	0.1		\$87.00									
	11/19/2020 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding ECF filing issues.	\$870	0.2		\$174.00									
	11/19/2020 Healey, Christopher J.	Further revisions to reply brief.	\$870	1.5		\$1,305.00									
	11/20/2020 Healey, Christopher J.	Revise reply brief.	\$870	7.1		\$6,177.00	3.55	3,088.50							
	11/20/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding reply brief.	\$870	0.2		\$174.00									
	11/20/2020 Healey, Christopher J.	Correspondence regarding mediation brief.	\$870	0.2		\$174.00									
	11/20/2020 Healey, Christopher J.	Correspondence with supporting cites for brief.	\$870	0.2		\$174.00									
	11/20/2020 Healey, Christopher J.	Telephone conference with Lindsay Petite regarding Kennedy supplemental declaration.	\$870	0.2		\$174.00									
	11/20/2020 Healey, Christopher J.	Follow-up correspondence with Kennedy's office regarding same.	\$870	0.2		\$174.00									
	11/20/2020 Healey, Christopher J.	Outline to-do list for reply filing.	\$870	0.2		\$174.00									
	11/20/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding record issues.	\$870	0.2		\$174.00									
	11/20/2020 Healey, Christopher J.	Correspondence with Kennedy's office regarding declaration.	\$870	0.2		\$174.00									
	11/20/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding reply brief.	\$870	0.1		\$87.00									
	11/20/2020 Healey, Christopher J.	Review and comment regarding supplemental Flores declaration.	\$870	0.6		\$522.00									
	11/21/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding reply brief.	\$870	0.2		\$174.00									
	11/21/2020 Healey, Christopher J.	Outline mediation brief and correspondence to Stebner's office regarding same.	\$870	1.2		\$1,044.00									
	11/21/2020 Healey, Christopher J.	Review ACHA applications and correspondence to Attorney Warren regarding same.	\$870	0.3		\$261.00									
	11/21/2020 Healey, Christopher J.	Review Sunrise's documents regarding schedule attainment issue.	\$870	0.3		\$261.00									
	11/21/2020 Healey, Christopher J.	Follow-up correspondence to team regarding mediation.	\$870	0.1		\$87.00									
	11/21/2020 Healey, Christopher J.	Draft Attorney Umpierre's declaration regarding class reply.	\$870	1		\$870.00									
	11/21/2020 Healey, Christopher J.	Correspondence regarding reply brief.	\$870	0.1		\$87.00									
	11/21/2020 Healey, Christopher J.	Review Attorney Wallace's changes to reply brief.	\$870	0.2		\$174.00									
	11/21/2020 Healey, Christopher J.	Revise reply brief.	\$870	1.5		\$1,305.00									
	11/21/2020 Healey, Christopher J.	Review Kennedy's supplement declaration.	\$870	0.5		\$435.00									
	11/21/2020 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding record evidence.	\$870	0.1		\$87.00									
	11/21/2020 Healey, Christopher J.	Correspondence with team regarding reply filing.	\$870	0.2		\$174.00									
	11/21/2020 Healey, Christopher J.	Revise class reply regarding manager discretion issues.	\$870	0.5		\$435.00									
	11/21/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding Kennedy supplemental declaration.	\$870	0.1		\$87.00									
	11/21/2020 Healey, Christopher J.	Further revisions to reply brief.	\$870	1		\$870.00									
	11/21/2020 Healey, Christopher J.	Review record citations.	\$870	0.7		\$609.00									
	11/22/2020 Healey, Christopher J.	Outline inserts to reply brief.	\$870	0.5		\$435.00									
	11/22/2020 Healey, Christopher J.	Revise reply brief.	\$870	0.4		\$348.00									
	11/22/2020 Healey, Christopher J.	Correspondence with Kennedy's office regarding reply declaration.	\$870	0.2		\$174.00									
	11/22/2020 Healey, Christopher J.	Telephone conference with Lindsay Petite regarding Kennedy declaration.	\$870	0.5		\$435.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	11/22/2020 Healey, Christopher J.	Follow-up analysis and correspondence regarding Kennedy declaration.	\$870	1.5		\$1,305.00								
	11/22/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding supporting declaration and key provisions issue.	\$870	0.3		\$261.00								
	11/22/2020 Healey, Christopher J.	Review Sunrise's assessment argument.	\$870	0.2		\$174.00								
	11/22/2020 Healey, Christopher J.	Research regarding financial elder abuse cases.	\$870	0.1		\$87.00								
	11/22/2020 Healey, Christopher J.	Further revisions to reply brief.	\$870	1.2		\$1,044.00								
	11/22/2020 Healey, Christopher J.	Prepare correspondence to team regarding Sunrise's assessment changes agreement.	\$870	0.2		\$174.00								
	11/22/2020 Myrick, Tracy R.	Download T. Berry deposition and exhibits and provide caseteam link to location.	\$195	0.5		\$97.50								
	11/22/2020 Myrick, Tracy R.	Upload M. Ward Deposition transcript/exhibits and provide caseteam link to location.	\$195	0.3		\$58.50								
	11/22/2020 Myrick, Tracy R.	Pull documents to be used as exhibits to C. Healey Reply to Motion for Class Certification and provide to caesteam.	\$195	0.6		\$117.00								
	11/23/2020 Ryan, Teresa M.	Review and cite/quote check legal authorities re reply brief in support of motion for class certification.	\$380	10.4		\$3,952.00	10.4	3952						
	11/23/2020 Ryan, Teresa M.	Input and ran auto-cite for response to defendants' objections to certain plaintiff's evidence in support of motion for class certification and reply brief in support of motion for class certification.	\$380											
	11/23/2020 Mercado, Charmaine	Bluebook and cite check Response to Defendants' Objections to Certain Evidence in Support of Their Motion for Class Certification.	\$325	2.8		\$910.00	2.8	910						
	11/23/2020 Healey, Christopher J.	Review response to Sunrise's evidentiary objections.	\$870	0.2		\$174.00								
	11/23/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding CDC analysis.	\$870	0.1		\$87.00								
	11/23/2020 Healey, Christopher J.	Review case correspondence.	\$870	0.1		\$87.00								
	11/23/2020 Healey, Christopher J.	Prepare correspondence regarding Waltman/Ventas subpoena.	\$870	0.1		\$87.00								
	11/23/2020 Healey, Christopher J.	Review open issues on reply brief.	\$870	0.8		\$696.00								
	11/23/2020 Healey, Christopher J.	Prepare correspondence regarding Onshift oversight document.	\$870	0.5		\$435.00								
	11/23/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding status.	\$870	0.1		\$87.00								
	11/23/2020 Healey, Christopher J.	Review and revise reply brief class certification.	\$870	0.7		\$609.00								
	11/23/2020 Healey, Christopher J.	Review CDC inserts to Kennedy declaration.	\$870	0.1		\$87.00								
	11/23/2020 Healey, Christopher J.	Telephone conference with Lindsay Petite regarding Kennedy reply declaration.	\$870	0.1		\$87.00								
	11/23/2020 Healey, Christopher J.	Prepare correspondence regarding ADL percentage issue.	\$870	0.2		\$174.00								
	11/23/2020 Healey, Christopher J.	Outline to-do points for MTS opposition.	\$870	0.2		\$174.00								
	11/23/2020 Healey, Christopher J.	Revise reply brief.	\$870	2.7		\$2,349.00								
	11/23/2020 Healey, Christopher J.	Review documents regarding CDC issue.	\$870	0.2		\$174.00								
	11/23/2020 Healey, Christopher J.	Correspondence with Attorney Marks regarding same.	\$870	0.2		\$174.00								
	11/23/2020 Healey, Christopher J.	Prepare correspondence to Kennedy's office regarding reply declaration.	\$870	0.1		\$87.00								
	11/23/2020 Healey, Christopher J.	Telephone conference with team regarding reply brief filing.	\$870	0.3		\$261.00	0.3	261.00						
	11/23/2020 Healey, Christopher J.	Review and revise Flores declaration.	\$870	0.3		\$261.00								
	11/23/2020 Myrick, Tracy R.	Download J. Walker deposition transcript/exhibits and provide caseteam link to location.	\$195	0.5		\$97.50								
	11/23/2020 Myrick, Tracy R.	Pull documents to be used as exhibits to C. Healey Reply to Motion for Class Certification and provide to caesteam.	\$195	0.1		\$19.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	11/24/2020 Healey, Christopher J.	Review Attorney Wallace's changes to class reply and revise brief accordingly.	\$870	0.3									
	11/24/2020 Healey, Christopher J.	Review auto-cite changes to brief and revise brief accordingly.	\$870	0.7									
	11/24/2020 Healey, Christopher J.	Correspondence regarding Flores declaration.	\$870	0.2									
	11/24/2020 Healey, Christopher J.	Review and comment on Kennedy declaration.	\$870	0.2									
	11/24/2020 Healey, Christopher J.	Revise reply brief and send correspondence regarding final changes.	\$870	0.7									
	11/24/2020 Healey, Christopher J.	Follow-up correspondence regarding Kennedy declaration.	\$870	0.1									
	11/24/2020 Healey, Christopher J.	Telephone conferences with Lindsay Petite regarding Kennedy declaration.	\$870	0.5									
	11/24/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.5									
	11/24/2020 Healey, Christopher J.	Review Attorney Marks' changes to reply brief.	\$870	0.2									
	11/24/2020 Healey, Christopher J.	Further revisions to reply brief.	\$870	2.1									
	11/24/2020 Healey, Christopher J.	Draft inserts to Kennedy declaration regarding care hours.	\$870	1									
	11/24/2020 Healey, Christopher J.	Review and revise response to evidence objections.	\$870	0.3									
	11/24/2020 Healey, Christopher J.	Prepare correspondence to mediation issues.	\$870	0.1									
	11/24/2020 Healey, Christopher J.	Correspondence with team regarding Kennedy declaration.	\$870	0.2									
	11/24/2020 Healey, Christopher J.	Review and comment on Kennedy declaration.	\$870	0.5									
	11/24/2020 Healey, Christopher J.	Review final response brief to evidence objections.	\$870	0.1									
	11/24/2020 Healey, Christopher J.	Prepare correspondence regarding final reply brief.	\$870	0.1									
	11/24/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding supporting declaration.	\$870	0.1									
	11/24/2020 Healey, Christopher J.	Review Kennedy declaration exhibits and comment regarding same.	\$870	0.3									
	11/24/2020 Healey, Christopher J.	Prepare correspondence regarding Kennedy exhibits.	\$870	0.1									
	11/24/2020 Healey, Christopher J.	Revise reply brief to include references to Kennedy declaration.	\$870	1									
	11/24/2020 Healey, Christopher J.	Further revisions to reply brief.	\$870	0.3									
	11/24/2020 Myrick, Tracy R.	Link exhibits to deposition transcript of Michael Ward and Jonathan Walker and import into CaseNotebook database.	\$195	0.6									
	11/24/2020 Myrick, Tracy R.	Update deposition log.	\$195	0.3									
	11/25/2020 Healey, Christopher J.	Review Attorney Gorman's email regarding budget variance ESI.	\$870	0.1									
	11/25/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1									
	11/25/2020 Healey, Christopher J.	Review Attorney Gorman's email regarding watermark document.	\$870	0.1									
	11/25/2020 Healey, Christopher J.	Review Sunrise's responses to RFAs regarding fees.	\$870	0.1									
	11/25/2020 Healey, Christopher J.	Prepare correspondence to team regarding meet and confer efforts regarding same.	\$870	0.2									
	11/25/2020 Healey, Christopher J.	Review meet and confer letter regarding open discovery issues.	\$870	0.2									
	11/25/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$870	0.2									
	11/25/2020 Healey, Christopher J.	Prepare to-do list.	\$870	0.1									
	11/30/2020 Healey, Christopher J.	Revise mediation brief.	\$870	2.7									
	11/30/2020 Healey, Christopher J.	Review draft mediation brief.	\$870	0.3									
	11/30/2020 Healey, Christopher J.	Prepare damage summary.	\$870	0.3									
	11/30/2020 Healey, Christopher J.	Prepare correspondence regarding Falkenberg CMC.	\$870	0.1									
	11/30/2020 Healey, Christopher J.	Prepare correspondence regarding mediation insert on evasive testimony.	\$870	0.1									
	11/30/2020 Healey, Christopher J.	Further revisions to mediation brief.	\$870	2.3									
	11/30/2020 Healey, Christopher J.	Prepare correspondence to team regarding mediation presentation.	\$870	0.2									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	12/1/2020 Healey, Christopher J.	Revise mediation brief.	\$870	6.1		\$5,307.00								
	12/1/2020 Healey, Christopher J.	Correspondence regarding team call for mediation preparation.	\$870	0.1		\$87.00								
	12/1/2020 Healey, Christopher J.	Prepare correspondence to team regarding draft brief.	\$870	0.2		\$174.00								
	12/1/2020 Myrick, Tracy R.	Download T. Berry deposition exhibits and provide caseteam link to location.	\$195	0.7		\$136.50								
	12/2/2020 Healey, Christopher J.	Correspondence regarding changes to mediation brief.	\$870	0.2		\$174.00								
	12/2/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding mediation brief.	\$870	0.2		\$174.00								
	12/2/2020 Healey, Christopher J.	Revise mediation brief.	\$870	2		\$1,740.00								
	12/2/2020 Healey, Christopher J.	Correspondence with team regarding same.	\$870	0.2		\$174.00								
	12/2/2020 Healey, Christopher J.	Finalize mediation brief.	\$870	2		\$1,740.00								
	12/2/2020 Healey, Christopher J.	Prepare correspondence regarding mediation preparation.	\$870	0.1		\$87.00								
	12/2/2020 Healey, Christopher J.	Correspondence regarding Rose Lochman interview.	\$870	0.2		\$174.00								
	12/2/2020 Healey, Christopher J.	Review and revise final mediation brief.	\$870	0.2		\$174.00								
	12/2/2020 Healey, Christopher J.	Prepare correspondence to team regarding brief.	\$870	0.1		\$87.00								
	12/2/2020 Myrick, Tracy R.	Download G. Kelly deposition video and provide caseteam link to location.	\$195	0.5		\$97.50								
	12/2/2020 Myrick, Tracy R.	Prepare correspondence to Attorney Thamer regarding Ops manuals.	\$870	0.1		\$87.00								
	12/3/2020 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding Sunrise mediation.	\$870	0.1		\$87.00								
	12/3/2020 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding Malone deposition.	\$870	0.1		\$87.00								
	12/3/2020 Healey, Christopher J.	Prepare for team call regarding mediation.	\$870	0.3		\$261.00								
	12/3/2020 Healey, Christopher J.	Team call regarding mediation preparation.	\$870	1.3		\$1,131.00			1.3	1,131.00				
	12/3/2020 Healey, Christopher J.	Prepare correspondence to team regarding Lochman interview.	\$870	0.1		\$87.00								
	12/3/2020 Healey, Christopher J.	Correspondence regarding Sunrise request for Fearn deposition.	\$870	0.1		\$87.00								
	12/3/2020 Myrick, Tracy R.	Conference call with L. Valdez regarding location of case materials.	\$195	0.3		\$58.50								
	12/4/2020 Healey, Christopher J.	Review Gibson letter regarding reply brief filing.	\$870	0.1		\$87.00								
	12/4/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding mediation presentation regarding Flores task times.	\$870	0.2		\$174.00								
	12/4/2020 Healey, Christopher J.	Correspondence regarding record issues.	\$870	0.1		\$87.00								
	12/4/2020 Healey, Christopher J.	Review Malone deposition testimony and prepare correspondence regarding same.	\$870	0.2		\$174.00								
	12/4/2020 Healey, Christopher J.	Review and revise letter regarding Defendants' clawback request on SUN4023.	\$870	0.4		\$348.00								
	12/4/2020 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding trial preparation and investigation issues.	\$870	0.2		\$174.00								
	12/5/2020 Healey, Christopher J.	Mediation preparation.	\$870	2.2		\$1,914.00								
	12/5/2020 Healey, Christopher J.	Correspondence with Mediator Kaplan regarding preparation.	\$870	0.1		\$87.00								
	12/6/2020 Healey, Christopher J.	Telephone conference with Rob Kaplan regarding mediation.	\$870	1.2		\$1,044.00								
	12/6/2020 Healey, Christopher J.	Prepare response to mediator questions.	\$870	1.8		\$1,566.00								
	12/7/2020 Healey, Christopher J.	Revise supplemental mediation brief.	\$870	0.5		\$435.00								
	12/7/2020 Healey, Christopher J.	Draft summary of other settlement.	\$870	0.8		\$696.00								
	12/7/2020 Healey, Christopher J.	Prepare correspondence to team regarding status.	\$870	0.5		\$435.00								
	12/7/2020 Healey, Christopher J.	Correspondence with Attorney Kawamoto regarding other settlements.	\$870	0.2		\$174.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>		
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>
	12/7/2020 Healey, Christopher J.	Telephone conference with Attorney Kawamoto regarding same.	\$870	0.1		\$87.00							
	12/7/2020 Healey, Christopher J.	Revise pocket brief and other settlement slides.	\$870	0.8		\$696.00							
	12/7/2020 Healey, Christopher J.	Correspondence with Attorney Wallace regarding settlement.	\$870	0.2		\$174.00							
	12/7/2020 Healey, Christopher J.	Prepare spreadsheet regarding settlement issues.	\$870	0.3		\$261.00							
	12/7/2020 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding mediation preparation and status.	\$870	0.2		\$174.00							
	12/7/2020 Healey, Christopher J.	Revise summary of other settlements.	\$870	0.5		\$435.00							
	12/7/2020 Healey, Christopher J.	Prepare correspondence to Mediator Kaplan regarding class certification summary and other settlement summary.	\$870	0.2		\$174.00							
	12/7/2020 Healey, Christopher J.	Prepare correspondence to team regarding mediation preparation.	\$870	0.3		\$261.00							
	12/7/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding preliminary staffing results.	\$870	0.2		\$174.00							
	12/7/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00							
	12/8/2020 Healey, Christopher J.	Prepare for mediation.	\$870	1		\$870.00							
	12/8/2020 Healey, Christopher J.	Prepare to-do list for trial preparation.	\$870	0.6		\$522.00							
	12/8/2020 Healey, Christopher J.	Review Marks' office staffing analysis.	\$870	0.1		\$87.00							
	12/8/2020 Healey, Christopher J.	Further mediation preparation.	\$870	0.2		\$174.00							
	12/8/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding mediation slides.	\$870	0.2		\$174.00							
	12/8/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding mediation preparation.	\$870	0.3		\$261.00							
	12/8/2020 Healey, Christopher J.	Revise Powerpoint regarding staffing analysis.	\$870	0.5		\$435.00							
	12/8/2020 Healey, Christopher J.	Review Flores deposition testimony.	\$870	0.5		\$435.00							
	12/8/2020 Healey, Christopher J.	Correspondence from Attorney Stebner regarding mediation and correspondence to Ms. Valdez regarding deposition transcript.	\$870	0.1		\$87.00							
	12/8/2020 Healey, Christopher J.	Prepare correspondence regarding responses to Sunrise's challenge to Flores testimony.	\$870	0.5		\$435.00							
	12/8/2020 Healey, Christopher J.	Prepare case to-do list.	\$870	0.2		\$174.00							
	12/8/2020 Healey, Christopher J.	Correspondence with Mediator Kaplan and team regarding start time.	\$870	0.1		\$87.00							
	12/8/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Flores risk opinion.	\$870	0.2		\$174.00							
	12/9/2020 Healey, Christopher J.	Correspondence with Attorney Stebner regarding client approval for settlement.	\$870	0.2		\$174.00							
	12/9/2020 Healey, Christopher J.	Prepare correspondence to team regarding Flores supplemental declaration and risk issue.	\$870	0.4		\$348.00							
	12/9/2020 Healey, Christopher J.	Prepare correspondence to Judicate West regarding confidentiality agreement.	\$870	0.1		\$87.00							
	12/9/2020 Healey, Christopher J.	Prepare for mediation.	\$870	1		\$870.00							
	12/9/2020 Healey, Christopher J.	Attend mediation.	\$870	8		\$6,960.00							
	12/9/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Flores analysis and preparation.	\$870	0.2		\$174.00							
	12/9/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding settlement follow-up issues.	\$870	0.3		\$261.00							
	12/9/2020 Healey, Christopher J.	Report to team regarding mediation session.	\$870	0.5		\$435.00							

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	12/10/2020 Healey, Christopher J.	Prepare correspondence to Attorney Thamer regarding former Sunrise employee lawsuits.	\$870	0.3	\$261.00								
	12/10/2020 Healey, Christopher J.	Correspondence regarding team calls.	\$870	0.2	\$174.00								
	12/10/2020 Healey, Christopher J.	Respond to mediator request regarding additional materials.	\$870	0.2	\$174.00								
	12/10/2020 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding other settlement comps.	\$870	0.2	\$174.00								
	12/10/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery issues.	\$870	0.2	\$174.00								
	12/10/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding settlement status.	\$870	0.2	\$174.00								
	12/10/2020 Healey, Christopher J.	Further follow-up regarding mediation materials.	\$870	0.2	\$174.00								
	12/11/2020 Healey, Christopher J.	Review documents regarding trial proof outline.	\$870	0.1	\$87.00								
	12/11/2020 Healey, Christopher J.	Telephone conference with investigation team.	\$870	0.5	\$435.00								
	12/11/2020 Healey, Christopher J.	Follow-up correspondence regarding investigation efforts.	\$870	0.2	\$174.00								
	12/11/2020 Healey, Christopher J.	Office conference with firm regarding Sunrise costs status and risk of future harm issues.	\$870	0.2	\$174.00								
	12/11/2020 Healey, Christopher J.	Review Attorney Umpierre's memo regarding application for status conference.	\$870	0.2	\$174.00								
	12/11/2020 Healey, Christopher J.	Correspondence regarding trial proof outline.	\$870	0.2	\$174.00								
	12/11/2020 Healey, Christopher J.	Outline trial preparation to do.	\$870	0.3	\$261.00								
	12/13/2020 Healey, Christopher J.	Prepare to-do list.	\$870	0.8	\$696.00								
	12/13/2020 Healey, Christopher J.	Prepare correspondence to team regarding to-do call.	\$870	0.8	\$696.00								
	12/13/2020 Healey, Christopher J.	Review correspondence regarding discovery issues.	\$870	0.2	\$174.00								
	12/13/2020 Myrick, Tracy R.	Download defendant document productions and provide caseteam with link to location.	\$195	0.5	\$97.50								
	12/13/2020 Myrick, Tracy R.	Update production log.	\$195	0.2	\$39.00								
	12/14/2020 Healey, Christopher J.	Outline trial proof elements.	\$870	4.3	\$3,741.00								
	12/14/2020 Healey, Christopher J.	Prepare for team call.	\$870	0.2	\$174.00								
	12/14/2020 Healey, Christopher J.	Conference call regarding settlement, case status and trial preparation.	\$870	1.5	\$1,305.00								
	12/14/2020 Healey, Christopher J.	Follow-up correspondence regarding discovery issues.	\$870	0.3	\$261.00								
	12/14/2020 Healey, Christopher J.	Draft response to Gorman letter regarding Watermark subpoena.	\$870	0.3	\$261.00								
	12/14/2020 Healey, Christopher J.	Outline inserts to motion to strike opposition.	\$870	0.1	\$87.00								
	12/14/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding task time issues.	\$870	0.2	\$174.00								
	12/14/2020 Myrick, Tracy R.	Provide follow-up email to caseteam regarding missing text files from defendant production.	\$195	0.1	\$19.50								
	12/14/2020 Myrick, Tracy R.	Download R.Crandall deposition transcript and exhibits.	\$195	0.4	\$78.00								
	12/14/2020 Myrick, Tracy R.	Work on extracting exhibits and provide caseteam link to location.	\$195	0.8	\$156.00								
	12/14/2020 Myrick, Tracy R.	Update deposition log relating to receipt of R. Crandall transcript and exhibits.	\$195	0.1	\$19.50								
	12/15/2020 Healey, Christopher J.	Revise trial proof outline.	\$870	0.8	\$696.00								
	12/15/2020 Healey, Christopher J.	Prepare correspondence to team.	\$870	0.2	\$174.00								
	12/15/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Watermark response.	\$870	0.2	\$174.00								
	12/15/2020 Healey, Christopher J.	Revise opposition to Schroyer motion to strike.	\$870	2	\$1,740.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	12/15/2020 Healey, Christopher J.	Research and analysis regarding Schroyer motion to strike opposition.	\$870	0.4		\$348.00								
	12/15/2020 Healey, Christopher J.	Review correspondence regarding key documents.	\$870	0.2		\$174.00								
	12/15/2020 Healey, Christopher J.	Prepare correspondence regarding follow-up issues on key documents.	\$870	0.2		\$174.00								
	12/15/2020 Healey, Christopher J.	Review Sunrise documents.	\$870	1		\$870.00								
	12/15/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00								
	12/15/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1		\$87.00								
	12/15/2020 Myrick, Tracy R.	Prepare list showing files that did not come with text files and provide to caseteam.	\$195	0.3		\$58.50								
	12/16/2020 Healey, Christopher J.	Revise Dale Schroyer motion to strike opposition.	\$870	0.6		\$522.00								
	12/16/2020 Healey, Christopher J.	Telephone conference with Mediator Kaplan regarding settlement.	\$870	0.2		\$174.00								
	12/16/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.2		\$174.00								
	12/16/2020 Healey, Christopher J.	Draft bullet points response on arbitration defense.	\$870	1		\$870.00								
	12/16/2020 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Lacey deposition issues.	\$870	0.3		\$261.00								
	12/16/2020 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery status and Lacey deposition preparation.	\$870	0.3		\$261.00								
	12/16/2020 Healey, Christopher J.	Revise arbitration bullet points.	\$870	0.1		\$87.00								
	12/16/2020 Healey, Christopher J.	Prepare correspondence to team regarding Lacey/Ginder depositions and document review.	\$870	0.3		\$261.00								
	12/16/2020 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding trial team and schedule.	\$870	0.2		\$174.00								
	12/16/2020 Healey, Christopher J.	Review and revise arbitration response bullet points.	\$870	0.1		\$87.00								
	12/16/2020 Healey, Christopher J.	Prepare correspondence regarding trial date.	\$870	0.2		\$174.00								
	12/16/2020 Healey, Christopher J.	Correspondence regarding deposition preparation.	\$870	0.2		\$174.00								
	12/16/2020 Healey, Christopher J.	Prepare correspondence regarding Service Plan interrogatory.	\$870	0.1		\$87.00								
	12/16/2020 Healey, Christopher J.	Review Sunrise's response regarding Service Plan interrogatory.	\$870	0.1		\$87.00								
	12/16/2020 Healey, Christopher J.	Revise Dale Schroyer motion to strike opposition.	\$870	1.4		\$1,218.00								
	12/16/2020 Myrick, Tracy R.	Prepare save search in Relativity relating to Lacey or Ginder and provide link to caseteam.	\$195	0.2		\$39.00								
	12/17/2020 Healey, Christopher J.	Review report regarding Ramirez review grant.	\$870	0.1		\$87.00								
	12/17/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00								
	12/17/2020 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding Dale Schroyer motion to strike opposition.	\$870	0.1		\$87.00								
	12/17/2020 Healey, Christopher J.	Revise Dale Schroyer motion to strike opposition.	\$870	6.9		\$6,003.00								
	12/17/2020 Healey, Christopher J.	Prepare correspondence to team regarding Dale Schroyer opposition draft.	\$870	0.2		\$174.00								
	12/17/2020 Healey, Christopher J.	Review summary of Cherwin (Shiferaw) testimony.	\$870	0.1		\$87.00								
	12/17/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.2		\$174.00								
	12/17/2020 Healey, Christopher J.	Review opposition to Flores motion to strike.	\$870	0.5		\$435.00								
	12/18/2020 Healey, Christopher J.	Revise opposition to Flores motion to strike.	\$870	2.2		\$1,914.00								
	12/18/2020 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding Cherwin testimony.	\$870	0.2		\$174.00								
	12/18/2020 Healey, Christopher J.	Draft background section to Flores motion to strike opposition.	\$870	2.3										
	12/19/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding assessment data issue.	\$870	0.2		\$174.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	12/19/2020 Healey, Christopher J.	Review Attorney Marks' correspondence regarding Schroyer testimony.	\$870	0.1		\$87.00									
	12/19/2020 Healey, Christopher J.	Correspondence regarding expert costs.	\$870	0.1		\$87.00									
	12/19/2020 Healey, Christopher J.	Revise opposition to Schroyer motion to strike.	\$870	3.5		\$3,045.00									
	12/20/2020 Healey, Christopher J.	Revise Flores motion to strike opposition.	\$870	4		\$3,480.00									
	12/21/2020 Healey, Christopher J.	Revise Flores motion to strike opposition.	\$870	5.2		\$4,524.00	2	1,740.00							
	12/21/2020 Healey, Christopher J.	Outline points for Lacey deposition.	\$870	0.2		\$174.00									
	12/21/2020 Healey, Christopher J.	Prepare correspondence to team regarding draft Flores opposition. Add revised privilege log to shared drive and provide caseteam link to location.	\$870	0.3		\$261.00									
	12/21/2020 Myrick, Tracy R.		\$195	0.1		\$19.50									
	12/22/2020 Healey, Christopher J.	Outline Lacey deposition objections.	\$870	0.1		\$87.00									
	12/22/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding settlement and related issues.	\$870	0.1		\$87.00									
	12/22/2020 Healey, Christopher J.	Review Gibson's proposal regarding case scheduling issues.	\$870	0.1		\$87.00									
	12/22/2020 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$870	0.1		\$87.00									
	12/22/2020 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding assessment data.	\$870	0.1		\$87.00									
	12/22/2020 Myrick, Tracy R.	Export files from "Lacey or Ginder" search results in Relativity and provide to Co-Counsel.	\$195	0.7		\$136.50									
	12/23/2020 Healey, Christopher J.	Draft revisions to Gibson letter regarding case schedule.	\$870	0.2		\$174.00									
	12/23/2020 Healey, Christopher J.	Prepare correspondence to team regarding proposed responses/scheduling approach.	\$870	0.3		\$261.00									
	12/23/2020 Healey, Christopher J.	Review and revise JOP opposition.	\$870	0.5		\$435.00									
	12/23/2020 Healey, Christopher J.	Outline Lacey deposition issues.	\$870	0.2		\$174.00									
	12/23/2020 Healey, Christopher J.	Correspondence regarding case schedule issue.	\$870	0.1		\$87.00									
	12/23/2020 Healey, Christopher J.	Correspondence regarding potential contribution from private providers.	\$870	0.1		\$87.00									
	12/23/2020 Healey, Christopher J.	Review Attorney Wright request for information regarding opt-outs and response regarding same.	\$870	0.2		\$174.00									
	12/23/2020 Healey, Christopher J.	Further review and revisions to JOP opposition.	\$870	2.5		\$2,175.00									
	12/23/2020 Healey, Christopher J.	Correspondence regarding case scheduling issues.	\$870	0.1		\$87.00									
	12/23/2020 Myrick, Tracy R.	Update production log.	\$195	0.2		\$39.00									
	12/23/2020 Myrick, Tracy R.	Download defendant document production and provide caseteam link to location.	\$195	0.5		\$97.50									
	12/24/2020 Healey, Christopher J.	Revise opposition to JOP motion.	\$870	2.2		\$1,914.00	1	870.00							
	12/28/2020 Healey, Christopher J.	Revise JOP opposition.	\$870	3.7		\$3,219.00	1	870.00							
	12/28/2020 Healey, Christopher J.	Further revisions to JOP opposition.	\$870	1.8		\$1,566.00									
	12/28/2020 Healey, Christopher J.	Correspondence regarding Sunrise document production.	\$870	0.1		\$87.00									
	12/28/2020 Healey, Christopher J.	Prepare correspondence regarding Sunrise's correspondence to Court regarding pending motions.	\$870	0.1		\$87.00									
	12/29/2020 Healey, Christopher J.	Revise JOP opposition.	\$870	5.9		\$5,133.00									
	12/29/2020 Healey, Christopher J.	Correspondence regarding Sunrise documents regarding DES model.	\$870	0.2		\$174.00									
	12/29/2020 Healey, Christopher J.	Review correspondence regarding case filings and discovery.	\$870	0.2		\$174.00									
	12/29/2020 Healey, Christopher J.	Prepare correspondence regarding key documents and Lacey deposition.	\$870	0.1		\$87.00									
	12/29/2020 Healey, Christopher J.	Follow-up correspondence regarding same.	\$870	0.1		\$87.00									
	12/30/2020 Healey, Christopher J.	Correspondence regarding Lacey deposition.	\$870	0.1		\$87.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	12/30/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding settlement issues.	\$870	0.2		\$174.00									
	12/30/2020 Healey, Christopher J.	Review background information regarding Sunrise management.	\$870	0.1		\$87.00									
	12/30/2020 Healey, Christopher J.	Review correspondence regarding document review.	\$870	0.1		\$87.00									
	12/30/2020 Healey, Christopher J.	Revise JOP opposition brief.	\$870	1.7		\$1,479.00									
	12/30/2020 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding settlement and scheduling issues.	\$870	0.4		\$348.00									
	12/30/2020 Healey, Christopher J.	Further revisions to JOP opposition.	\$870	3.6		\$3,132.00		1	870.00						
	12/31/2020 Healey, Christopher J.	Revise JOP opposition.	\$870	3.9		\$3,393.00		1	870.00						
	12/31/2020 Healey, Christopher J.	Review key documents spreadsheet regarding Lacey/CLM.	\$870	0.2		\$174.00									
	12/31/2020 Healey, Christopher J.	Further revisions to JOP opposition.	\$870	0.7		\$609.00									
	12/31/2020 Healey, Christopher J.	Prepare correspondence to team regarding draft JOP opposition.	\$870	0.1		\$87.00									
	12/31/2020 Healey, Christopher J.	Prepare correspondence regarding reply brief errata.	\$870	0.1		\$87.00									
	1/2/2021 Healey, Christopher J.	Outline opposition to Kennedy motion to strike.	\$895	0.2		\$179.00									
	1/2/2021 Healey, Christopher J.	Correspondence regarding Malone transcript.	\$895	0.1		\$89.50									
	1/4/2021 Healey, Christopher J.	Review errata notice.	\$895	0.1		\$89.50									
	1/4/2021 Healey, Christopher J.	Correspondence from Attorney Marks regarding Lacey discovery requests.	\$895	0.1		\$89.50									
	1/4/2021 Healey, Christopher J.	Review TCB presentation.	\$895	0.1		\$89.50									
	1/4/2021 Healey, Christopher J.	Draft opposition to Kennedy motion to strike.	\$895	3.7		\$3,311.50									
	1/4/2021 Healey, Christopher J.	Telephone conference with Ms. Valdez regarding errata notice.	\$895	0.1		\$89.50									
	1/4/2021 Myrick, Tracy R.	Upload Privilege log from Defendant Production SUN036 and provide caseteam link to location.	\$195	0.1		\$19.50									
	1/4/2021 Myrick, Tracy R.	Update production log.	\$195	0.3		\$58.50									
	1/4/2021 Myrick, Tracy R.	Link exhibits to deposition transcript of Robert Crandall and import into CaseNotebook database.	\$195	0.7		\$136.50									
	1/5/2021 Healey, Christopher J.	Review and revise discovery meet and confer email.	\$895	0.1		\$89.50									
	1/5/2021 Healey, Christopher J.	Revise opposition to Kennedy motion to strike.	\$895	1.5		\$1,342.50									
	1/5/2021 Healey, Christopher J.	Correspondence regarding Lacey deposition and documents.	\$895	0.2		\$179.00									
	1/5/2021 Healey, Christopher J.	Correspondence regarding Sunrise SQL database issue.	\$895	0.2		\$179.00									
	1/5/2021 Healey, Christopher J.	Further revisions to Kennedy motion to strike opposition.	\$895	3.2		\$2,864.00									
	1/5/2021 Healey, Christopher J.	Correspondence regarding Lacey deposition.	\$895	0.2		\$179.00									
	1/5/2021 Healey, Christopher J.	Follow-up correspondence regarding Lacey deposition and document production.	\$895	0.2		\$179.00									
	1/5/2021 Healey, Christopher J.	Prepare correspondence regarding JOP/motion to strike opposition briefs.	\$895	0.1		\$89.50									
	1/6/2021 Healey, Christopher J.	Prepare correspondence regarding arbitration issues.	\$895	0.3		\$268.50									
	1/6/2021 Healey, Christopher J.	Prepare correspondence regarding research assignments.	\$895	0.1		\$89.50									
	1/6/2021 Healey, Christopher J.	Review research assignment and prepare correspondence to Attorney Ross regarding same.	\$895	0.3		\$268.50		0.3	268.50						
	1/6/2021 Healey, Christopher J.	Telephone conference with Attorney Ross regarding research assignment.	\$895	0.2		\$179.00		0.2	179						
	1/6/2021 Healey, Christopher J.	Revise Kennedy motion to strike opposition.	\$895	4.3		\$3,848.50									
	1/6/2021 Ross, Rachel L.	Strategy call with C. Healey to discuss new research assignment	\$445	0.2		\$89.00		0.2	89						
	1/6/2021 Healey, Christopher J.	Prepare correspondence to team regarding outstanding discovery issues.	\$895	0.2		\$179.00									
	1/7/2021 Healey, Christopher J.	Follow-up correspondence regarding same.	\$895	0.1		\$89.50									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
	1/7/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery issues.	\$895	0.2							
	1/7/2021 Healey, Christopher J.	Review Gibson brief regarding DoorDash arbitration.	\$895	0.2	\$179.00						
	1/7/2021 Healey, Christopher J.	Telephone conference with Attorney Warren regarding arbitration issues and trial preparation.	\$895	0.2	\$179.00						
	1/7/2021 Healey, Christopher J.	Draft ADR statement.	\$895	0.6	\$537.00						
	1/7/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.1	\$89.50						
	1/7/2021 Healey, Christopher J.	Revise opposition to Kennedy motion to strike.	\$895	1.2	\$1,074.00						
	1/7/2021 Healey, Christopher J.	Review and revise discovery letter request for informal conference.	\$895	0.6	\$537.00						
	1/7/2021 Valero, Carmen A.	Research 9th Circuit case law regarding equitable factors under the federal equitable principles test, for C. Healey.	\$360	2	\$720.00						
	1/8/2021 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding settlement approach.	\$895	0.1	\$89.50						
	1/8/2021 Healey, Christopher J.	Review correspondence regarding discovery conference.	\$895	0.2	\$179.00						
	1/8/2021 Healey, Christopher J.	Follow-up correspondence regarding same.	\$895	0.1	\$89.50						
	1/8/2021 Healey, Christopher J.	Revise discovery letter.	\$895	0.2	\$179.00						
	1/8/2021 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding potential Sunrise witness.	\$895	0.1	\$89.50						
	1/8/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery conference letter.	\$895	0.1	\$89.50						
	1/8/2021 Healey, Christopher J.	Correspondence regarding witness issues.	\$895	0.1	\$89.50						
	1/8/2021 Healey, Christopher J.	Review Falkenberg arbitration petition issues.	\$895	0.2	\$179.00					0.2	179.00
	1/8/2021 Healey, Christopher J.	Telephone conference with team regarding Falkenberg arbitration petition.	\$895	0.7	\$626.50					0.7	626.50
	1/8/2021 Healey, Christopher J.	Revise Kennedy motion to strike opposition.	\$895	0.3	\$268.50						
	1/8/2021 Healey, Christopher J.	Telephone conference with Attorneys Johnson and Wallace regarding case discovery, Daubert opposition motions and scheduling.	\$895	0.5	\$447.50						
	1/8/2021 Healey, Christopher J.	Review case schedule and outline options regarding same.	\$895	0.5	\$447.50						
	1/8/2021 Healey, Christopher J.	Prepare correspondence regarding trial preparation issues.	\$895	0.1	\$89.50						
	1/8/2021 Myrick, Tracy R.	Upload Court Reporter's certification pages regarding J. Walker deposition to shared drive and provide caseteam link to location.	\$195	0.1	\$19.50						
	1/9/2021 Healey, Christopher J.	Prepare correspondence regarding Attorney Marks' revisions to Schroyer motion to strike opposition.	\$895	0.2	\$179.00						
	1/9/2021 Healey, Christopher J.	Revise motion to strike Kennedy opposition.	\$895	2.7	\$2,416.50	1	895.00				
	1/10/2021 Healey, Christopher J.	Revise motion to strike Kennedy opposition.	\$895	1	\$895.00						
	1/11/2021 Healey, Christopher J.	Revise opposition to Kennedy motion to strike.	\$895	1.9	\$1,700.50						
	1/11/2021 Healey, Christopher J.	Further revisions to Kennedy motion to strike.	\$895	0.7	\$626.50						
	1/11/2021 Healey, Christopher J.	Review Attorney Gorman's discovery response.	\$895	0.1	\$89.50						
	1/11/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$895	0.2	\$179.00						
	1/11/2021 Healey, Christopher J.	Telephone conference with Pat Kennedy regarding class damage model.	\$895	0.2	\$179.00						
	1/11/2021 Healey, Christopher J.	Review Attorney Wallace's comments to JOP opposition and prepare correspondence regarding same.	\$895	0.3	\$268.50						
	1/11/2021 Myrick, Tracy R.	Upload Court Reporters Certification pages regarding Edna Musoke deposition and provide caseteam link to location.	\$195	0.1	\$19.50						

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/11/2021 Myrick, Tracy R.	Upload Court Reporters Certification pages for T. Berry deposition and provide caseteam link to location.	\$195	0.1		\$19.50									
	1/12/2021 Healey, Christopher J.	Revise revised JOP opposition.	\$895	0.1		\$89.50									
	1/12/2021 Healey, Christopher J.	Review Attorney Ross' research correspondence regarding jury determination issues.	\$895	0.1		\$89.50									
	1/12/2021 Healey, Christopher J.	Prepare correspondence regarding ADR statement.	\$895	0.1		\$89.50									
	1/12/2021 Healey, Christopher J.	Revise Kennedy motion to strike opposition.	\$895	0.4		\$358.00									
	1/12/2021 Howard, Kathryn M.	Reviewed and cite checked Plaintiffs' Opposition to Motion for Judgment on the Pleadings and revised same.	\$325	3.6		\$1,170.00									
	1/12/2021 Howard, Kathryn M.	Emails exchanges with L. Valdez.	\$325	0.1		\$32.50									
	1/12/2021 Howard, Kathryn M.	Further review and revision to Opposition.	\$325	0.4		\$130.00									
	1/12/2021 Howard, Kathryn M.	Finalized opposition and prepared email to C. Healey regarding same.	\$325	0.2		\$65.00									
	1/12/2021 Ross, Rachel L.	Legal research of case law to determine whether entitlement and amount of offset is a factual question to be determined by a jury	\$445	6		\$2,670.00		6	2,670.00						
	1/13/2021 Healey, Christopher J.	Prepare correspondence to Attorney Warren regarding consolidation issue with Falkenberg.	\$895	0.1		\$89.50									
	1/13/2021 Healey, Christopher J.	Review and comment on changes to ADR statement.	\$895	0.1		\$89.50						0.1	89.50		
	1/13/2021 Healey, Christopher J.	Review and comment on Attorney Wallace's changes to Schroyer motion to strike opposition.	\$895	0.2		\$179.00									
	1/13/2021 Healey, Christopher J.	Prepare correspondence regarding Schroyer opposition.	\$895	0.1		\$89.50									
	1/13/2021 Healey, Christopher J.	Revise ADR statement and correspondence to team regarding same.	\$895	0.3		\$268.50									
	1/13/2021 Healey, Christopher J.	Review and revise JOP opposition.	\$895	5.2		\$4,654.00		1	895.00						
	1/13/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Schroyer opposition and damages issue.	\$895	0.3		\$268.50									
	1/14/2021 Cahn, Kristy M.	Cite check opposition to defendant's motion for judgment on the pleadings	\$385	4.3		\$1,655.50		4.3	1655.5						
	1/14/2021 Healey, Christopher J.	Revise opposition to Schroyer motion to strike.	\$895	2.3		\$2,058.50									
	1/14/2021 Healey, Christopher J.	Prepare correspondence to team regarding updated opposition.	\$895	0.2		\$179.00									
	1/14/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$895	0.2		\$179.00									
	1/14/2021 Healey, Christopher J.	Review Attorney Umpierre's report regarding discovery meet and confer.	\$895	0.2		\$179.00									
	1/14/2021 Healey, Christopher J.	Response regarding same.	\$895	0.3		\$268.50									
	1/14/2021 Healey, Christopher J.	Prepare correspondence to team regarding case schedule, final discovery and trial preparation.	\$895	0.3		\$268.50									
	1/14/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding 9/24 Gibson discovery letter.	\$895	0.3		\$268.50									
	1/14/2021 Healey, Christopher J.	Review and revise Schroyer motion to strike opposition.	\$895	1		\$895.00									
	1/14/2021 Healey, Christopher J.	Correspondence regarding same.	\$895	0.2		\$179.00									
	1/14/2021 Healey, Christopher J.	Correspondence regarding JOP opposition and motion to seal.	\$895	0.1		\$89.50									
	1/14/2021 Healey, Christopher J.	Review Attorney Umpierre's changes to Schroyer motion to strike opposition.	\$895	0.3		\$268.50									
	1/14/2021 Healey, Christopher J.	Further revisions to Schroyer motion to strike opposition.	\$895	0.4		\$358.00									
	1/14/2021 Healey, Christopher J.	Review Sunrise's document production.	\$895	0.2		\$179.00									
	1/14/2021 Howard, Kathryn M.	Reviewed and cite checked Plaintiffs' Opposition to Schroyer's Declaration and revised same.	\$325	1.9		\$617.50									
	1/14/2021 Howard, Kathryn M.	Prepared email to C. Healey regarding same.	\$325	0.1		\$32.50									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/14/2021 Howard, Kathryn M.	Email exchanges regarding same.	\$325	0.1		\$32.50								
	1/14/2021 Myrick, Tracy R.	Download defendant production and provide caseteam with details and link to location.	\$195	0.8		\$156.00								
	1/14/2021 Myrick, Tracy R.	Update production log.	\$195	0.1		\$19.50								
	1/15/2021 Healey, Christopher J.	Review Sunrise's email regarding assessment data.	\$895	0.1		\$89.50								
	1/15/2021 Healey, Christopher J.	Outline options regarding same and prepare correspondence to team.	\$895	0.2		\$179.00								
	1/15/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$895	0.1		\$89.50								
	1/15/2021 Healey, Christopher J.	Review final JOP opposition brief.	\$895	0.5		\$447.50								
	1/15/2021 Healey, Christopher J.	Review and finalize Schroyer motion to strike opposition.	\$895	1		\$895.00								
	1/15/2021 Healey, Christopher J.	Review Sunrise's correspondence regarding assessment production.	\$895	0.1		\$89.50								
	1/15/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Schroyer opposition.	\$895	0.2		\$179.00								
	1/15/2021 Healey, Christopher J.	Follow-up correspondence regarding assessment data production.	\$895	0.2		\$179.00								
	1/15/2021 Healey, Christopher J.	Prepare to-do list.	\$895	0.2		\$179.00								
	1/15/2021 Healey, Christopher J.	Prepare correspondence regarding discovery issues.	\$895	0.1		\$89.50								
	1/15/2021 Healey, Christopher J.	Prepare correspondence regarding metadata information on time study spreadsheet.	\$895	0.2		\$179.00								
	1/15/2021 Healey, Christopher J.	Follow-up correspondence regarding Schroyer motion to strike opposition.	\$895	0.2		\$179.00								
	1/15/2021 Healey, Christopher J.	Email exchange with L. Valdez regarding cases.	\$325	0.1		\$32.50								
	1/15/2021 Myrick, Tracy R.	Download supplemental production of a text file from defendants and provide caseteam link to location.	\$195	0.1		\$19.50								
	1/15/2021 Myrick, Tracy R.	Prepare spreadsheet showing metadata provided for SUN0136914 and provide to caseteam.	\$195	0.2		\$39.00								
	1/15/2021 Myrick, Tracy R.	Gather Plaintiff and Defendant Expert production data and provide to R. Bonner so he may upload to Relativity.	\$195	0.7		\$136.50								
	1/15/2021 Myrick, Tracy R.	Update production log.	\$195	0.1		\$19.50								
	1/18/2021 Healey, Christopher J.	Review and revise Kennedy motion to strike opposition.	\$895	0.2		\$179.00								
	1/18/2021 Healey, Christopher J.	Further revisions to Kennedy motion to strike opposition.	\$895	1.4		\$1,253.00								
	1/18/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Prandel analysis and case schedule.	\$895	0.5		\$447.50								
	1/19/2021 Healey, Christopher J.	Revise motion for status conference.	\$895	1.1		\$984.50								
	1/19/2021 Healey, Christopher J.	Prepare correspondence to team regarding case status issues.	\$895	0.1		\$89.50								
	1/19/2021 Healey, Christopher J.	Review correspondence regarding investigation.	\$895	0.2		\$179.00								
	1/19/2021 Healey, Christopher J.	Analysis regarding case schedule and request for status conference.	\$895	0.2		\$179.00								
	1/19/2021 Healey, Christopher J.	Analysis regarding case schedule approach.	\$895	0.5		\$447.50								
	1/19/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Flores motion to strike.	\$895	0.3		\$268.50								
	1/19/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding case schedule.	\$895	0.3		\$268.50								
	1/19/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding status conference motion.	\$895	0.2		\$179.00								
	1/19/2021 Healey, Christopher J.	Revise ADR statement.	\$895	0.1		\$89.50								
	1/19/2021 Healey, Christopher J.	Review Attorney Gorman's email regarding discovery issues.	\$895	0.1		\$89.50								
	1/19/2021 Healey, Christopher J.	Prepare correspondence regarding expert costs.	\$895	0.1		\$89.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/19/2021 Healey, Christopher J.	Draft Intro section to status conference motion.	\$895	0.5		\$447.50									
	1/20/2021 Healey, Christopher J.	Review correspondence regarding assessment data.	\$895	0.1		\$89.50									
	1/20/2021 Healey, Christopher J.	Revise Kennedy motion to strike opposition.	\$895	2.5		\$2,237.50									
	1/20/2021 Healey, Christopher J.	Correspondence regarding status conference issues and ADR statement.	\$895	0.2		\$179.00									
	1/20/2021 Healey, Christopher J.	Further revisions to Kennedy motion to strike opposition.	\$895	1.3		\$1,163.50									
	1/20/2021 Myrick, Tracy R.	Update production log.	\$195	0.1		\$19.50									
	1/21/2021 Healey, Christopher J.	Review correspondence regarding status conference motion.	\$895	0.1		\$89.50									
	1/21/2021 Healey, Christopher J.	Revise Kennedy motion to strike opposition.	\$895	1		\$895.00									
	1/21/2021 Healey, Christopher J.	Review Attorney Needham's analysis regarding Sunrise financial status.	\$895	0.1		\$89.50									
	1/21/2021 Healey, Christopher J.	Telephone conference with Attorney Needham regarding same.	\$895	0.2		\$179.00									
	1/21/2021 Healey, Christopher J.	Outline oral argument regarding class motion.	\$895	0.1		\$89.50									
	1/21/2021 Healey, Christopher J.	Prepare for oral argument on class motion.	\$895	0.2		\$179.00									
	1/21/2021 Healey, Christopher J.	Correspondence with mediator Kaplan regarding status.	\$895	0.2		\$179.00									
	1/21/2021 Healey, Christopher J.	Follow-up correspondence regarding same.	\$895	0.1		\$89.50									
	1/21/2021 Valero, Carmen A.	Research regarding case schedule approach.	\$360	1.5		\$540.00	0.75	270.00							
	1/22/2021 Healey, Christopher J.	Prepare correspondence regarding ADR statement.	\$895	0.1		\$89.50									
	1/22/2021 Healey, Christopher J.	Prepare for class certification argument.	\$895	0.7		\$626.50									
	1/22/2021 Healey, Christopher J.	Review research regarding statutory damages offset.	\$895	0.7		\$626.50									
	1/22/2021 Healey, Christopher J.	Correspondence regarding Flores motion to strike opposition.	\$895	0.1		\$89.50									
	1/22/2021 Healey, Christopher J.	Revise Kennedy motion to strike opposition.	\$895	0.5		\$447.50									
	1/22/2021 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$895	0.1		\$89.50									
	1/22/2021 Healey, Christopher J.	Review Attorney Wallace's comments regarding Flores motion to strike opposition.	\$895	0.1		\$89.50									
	1/22/2021 Healey, Christopher J.	Review Sunrise's request for sur-reply.	\$895	0.5		\$447.50									
	1/22/2021 Healey, Christopher J.	Correspondence regarding meet and confer on Plaintiffs' motion for status conference.	\$895	0.4		\$358.00									
	1/22/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Flores opposition brief.	\$895	0.2		\$179.00									
	1/22/2021 Healey, Christopher J.	Outline revisions to Flores motion to strike opposition.	\$895	0.2		\$179.00									
	1/22/2021 Healey, Christopher J.	Correspondence regarding status conference request.	\$895	0.2		\$179.00									
	1/23/2021 Healey, Christopher J.	Review Attorney Marks' revisions to Flores motion to strike opposition.	\$895	0.5		\$447.50									
	1/23/2021 Healey, Christopher J.	Revise Flores motion to strike opposition.	\$895	5		\$4,475.00									
	1/23/2021 Healey, Christopher J.	Correspondence with team regarding Defendants' sur-reply brief and response.	\$895	0.2		\$179.00									
	1/23/2021 Healey, Christopher J.	Correspondence with Attorney Wallace regarding Kennedy motion to strike.	\$895	0.2		\$179.00									
	1/23/2021 Healey, Christopher J.	Prepare correspondence regarding sur-reply motion and opposition.	\$895	0.1		\$89.50									
	1/24/2021 Healey, Christopher J.	Revise Flores motion to strike opposition.	\$895	1.7		\$1,521.50									
	1/24/2021 Healey, Christopher J.	Review correspondence from team regarding Flores motion to strike opposition.	\$895	0.2		\$179.00									
	1/24/2021 Healey, Christopher J.	Revise Flores motion to strike opposition.	\$895	0.9		\$805.50									
	1/25/2021 Healey, Christopher J.	Review and comment on motion for status conference.	\$895	1.2		\$1,074.00									
	1/25/2021 Healey, Christopher J.	Prepare correspondence regarding Musoke arguments.	\$895	0.1		\$89.50									
	1/25/2021 Healey, Christopher J.	Review and revise Errata Notice.	\$895	0.2		\$179.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/25/2021 Healey, Christopher J.	Prepare correspondence regarding Defendant's arguments to Flores declaration.	\$895	0.2	\$179.00								
	1/25/2021 Healey, Christopher J.	Review Attorney Wallace's changes to Kennedy motion to strike opposition.	\$895	0.2	\$179.00								
	1/25/2021 Healey, Christopher J.	Revise Kennedy motion to strike opposition.	\$895	4	\$3,580.00								
	1/25/2021 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding financial elder abuse issues.	\$895	0.1	\$89.50								
	1/25/2021 Healey, Christopher J.	Prepare for class certification hearing.	\$895	0.2	\$179.00								
	1/25/2021 Healey, Christopher J.	Further revisions to Flores motion to strike opposition.	\$895	2.3	\$2,058.50	1	895.00						
	1/26/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Flores motion to strike opposition.	\$895	0.2	\$179.00								
	1/26/2021 Healey, Christopher J.	Revise Flores motion to strike opposition.	\$895	3.9	\$3,490.50	1	895.00						
	1/26/2021 Healey, Christopher J.	Prepare correspondence to Carmen Valero regarding research request.	\$895	0.1	\$89.50								
	1/26/2021 Healey, Christopher J.	Review Attorney Wallace's changes to Kennedy motion to strike opposition.	\$895	0.1	\$89.50								
	1/26/2021 Healey, Christopher J.	Correspondence regarding Flores motion to strike opposition.	\$895	0.1	\$89.50								
	1/26/2021 Healey, Christopher J.	Further revisions to Flores motion to strike opposition.	\$895	4.1	\$3,669.50	1	895.00						
	1/26/2021 Healey, Christopher J.	Prepare correspondence to team regarding Flores motion to strike opposition.	\$895	0.2	\$179.00								
	1/26/2021 Healey, Christopher J.	Review Kennedy motion to strike opposition.	\$895	0.1	\$89.50								
	1/26/2021 Howard, Kathryn M.	Email exchanges regarding plaintiffs' opposition to Kennedy Declaration.	\$325	0.1	\$32.50								
	1/26/2021 Howard, Kathryn M.	Analysis of opposition checked each citation including auto-citing each citation and reviewed negative history.	\$325	2.9	\$942.50								
	1/26/2021 Howard, Kathryn M.	Revised opposition.	\$325	0.5	\$162.50								
	1/26/2021 Howard, Kathryn M.	Prepared email to C. Healey regarding the reversal and remanding of Lambert including the Supreme Court case.	\$325	0.1	\$32.50								
	1/27/2021 Healey, Christopher J.	Review and comment on Umpierre declaration in support of Flores motion to strike opposition.	\$895	0.3	\$268.50								
	1/27/2021 Healey, Christopher J.	Further revisions to Flores motion to strike opposition.	\$895	0.5	\$447.50								
	1/27/2021 Healey, Christopher J.	Further revisions to Kennedy motion to strike opposition.	\$895	0.2	\$179.00								
	1/27/2021 Healey, Christopher J.	Correspondence regarding Errata notice.	\$895	0.1	\$89.50								
	1/27/2021 Healey, Christopher J.	Prepare for class certification hearing.	\$895	2.2	\$1,969.00								
	1/27/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Flores motion to strike opposition.	\$895	0.2	\$179.00								
	1/27/2021 Healey, Christopher J.	Correspondence regarding class certification hearing.	\$895	0.1	\$89.50								
	1/27/2021 Healey, Christopher J.	Review Sunrise supplemental authority.	\$895	0.5	\$447.50								
	1/27/2021 Healey, Christopher J.	Outline responses regarding same.	\$895	0.5	\$447.50								
	1/27/2021 Healey, Christopher J.	Correspondence with Wallace's office regarding arbitration issues.	\$895	0.3	\$268.50								
	1/27/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding class hearing.	\$895	0.7	\$626.50								
	1/27/2021 Healey, Christopher J.	Review Attorney Marks' changes to Flores motion to strike opposition and prepare correspondence regarding same.	\$895	0.3	\$268.50								
	1/27/2021 Healey, Christopher J.	Review financial abuse damage cases.	\$895	0.4	\$358.00								
	1/27/2021 Howard, Kathryn M.	Email exchanges regarding plaintiffs' opposition to Flores Declaration and telephone conference regarding same.	\$325	0.1	\$32.50								
	1/27/2021 Howard, Kathryn M.	Analysis of opposition.	\$325	0.4	\$130.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/27/2021 Howard, Kathryn M.	Checked each citation including auto-citing each citation and reviewed negative history.	\$325	1.5		\$487.50									
	1/27/2021 Howard, Kathryn M.	Revised opposition.	\$325	0.8		\$260.00									
	1/27/2021 Howard, Kathryn M.	Reviewed and finalized opposition prepared email to C. Healey plaintiffs' opposition, changes thereto and negative case history. Research CA cases discussing damages/restitution available under financial elder abuse claims, for C. Healey.	\$325	0.5		\$162.50									
	1/27/2021 Valero, Carmen A.	Prepare for class certification hearing.	\$360	0.5		\$180.00									
	1/28/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding class certification argument.	\$895	2.3		\$2,058.50									
	1/28/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding additional arguments.	\$895	0.2		\$179.00									
	1/28/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding same.	\$895	0.5		\$447.50									
	1/28/2021 Healey, Christopher J.	Prepare correspondence to Patrick Kennedy regarding sur-reply arguments.	\$895	0.1		\$89.50									
	1/28/2021 Healey, Christopher J.	Further preparation for class hearing.	\$895	0.2		\$179.00									
	1/28/2021 Healey, Christopher J.	Prepare for class certification hearing.	\$895	4.2		\$3,759.00									
	1/29/2021 Healey, Christopher J.	Attend hearing regarding class certification motion and leave to amend.	\$895	5.5		\$4,922.50	2	1,790.00							
	1/29/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding hearing and follow-up.	\$895	1.5		\$1,342.50									
	1/29/2021 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding hearing and follow-up.	\$895	0.3		\$268.50									
	1/29/2021 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding same.	\$895	0.3		\$268.50									
	1/29/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding assessment data, hearing results and damage model analysis.	\$895	0.2		\$179.00									
	1/29/2021 Healey, Christopher J.	Review JOP reply and outline response to same.	\$895	0.5		\$447.50									
	1/30/2021 Healey, Christopher J.	Outline approach regarding amended class.	\$895	2		\$1,790.00									
	1/30/2021 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding same.	\$895	0.2		\$179.00									
	1/30/2021 Healey, Christopher J.	Prepare correspondence to team regarding strategy call.	\$895	0.2		\$179.00									
	1/30/2021 Healey, Christopher J.	Review reply on Schroyer motion to strike.	\$895	0.1		\$89.50									
	1/30/2021 Healey, Christopher J.	Review defendants' cases on JOP motion.	\$895	0.1		\$89.50									
	1/30/2021 Healey, Christopher J.	Outline argument regarding JOP motion.	\$895	3		\$2,685.00									
	1/30/2021 Healey, Christopher J.	Review interview summary regarding Petaluma witness.	\$895	0.5		\$447.50									
	1/31/2021 Healey, Christopher J.	Follow-up correspondence regarding same.	\$895	0.1		\$89.50									
	1/31/2021 Healey, Christopher J.	Prepare for JOP argument.	\$895	0.1		\$89.50									
	1/31/2021 Healey, Christopher J.	Outline to-do list.	\$895	0.8		\$716.00									
	2/1/2021 Healey, Christopher J.	Correspondence regarding open discovery issues.	\$895	0.2		\$179.00									
	2/1/2021 Healey, Christopher J.	Correspondence regarding Pretrial procedures.	\$895	0.2		\$179.00									
	2/1/2021 Healey, Christopher J.	Prepare correspondence to team regarding conference call.	\$895	0.1		\$89.50									
	2/1/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding missing assessment data.	\$895	0.1		\$89.50									
	2/1/2021 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding case status and plan regarding class issues.	\$895	0.1		\$89.50									
	2/1/2021 Healey, Christopher J.	Prepare for JOP argument and correspondence regarding same.	\$895	0.4		\$358.00									
	2/1/2021 Healey, Christopher J.	Telephone conference with Attorney Warren regarding CLRA remedies issue and research regarding same.	\$895	0.5		\$447.50									
	2/1/2021 Healey, Christopher J.	Telephone conference with Attorneys Warren and Umpierre regarding discovery issues.	\$895	0.3		\$268.50									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	2/1/2021 Healey, Christopher J.	Correspondence regarding witness from Palos Verdes facility.	\$895	0.1		\$89.50								
	2/1/2021 Healey, Christopher J.	Outline additional discovery requests.	\$895	0.2		\$179.00								
	2/2/2021 Healey, Christopher J.	Prepare correspondence to Attorney Warren regarding interrogatories.	\$895	0.5		\$447.50								
	2/2/2021 Healey, Christopher J.	Prepare correspondence regarding witness list.	\$895	0.1		\$89.50								
	2/2/2021 Healey, Christopher J.	Analysis regarding other payors issue.	\$895	0.5		\$447.50								
	2/2/2021 Healey, Christopher J.	Prepare for Patrick Kennedy call.	\$895	0.2		\$179.00								
	2/2/2021 Healey, Christopher J.	Telephone conference with Patrick Kennedy and Dale Schroyer regarding damages analysis.	\$895	1.3		\$1,163.50								
	2/2/2021 Healey, Christopher J.	Telephone conference with discovery team regarding open discovery issues.	\$895	0.7		\$626.50			0.7	626.50				
	2/2/2021 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding settlement status and potential subclass.	\$895	0.3		\$268.50								
	2/2/2021 Healey, Christopher J.	Correspondence with team regarding settlement issues.	\$895	0.2		\$179.00								
	2/2/2021 Healey, Christopher J.	Prepare correspondence regarding updated service levels data.	\$895	0.2		\$179.00								
	2/2/2021 Healey, Christopher J.	Telephone conference with team regarding settlement.	\$895	0.2		\$179.00			0.2	179.00				
	2/2/2021 Healey, Christopher J.	Follow-up correspondence to team regarding settlement proposal.	\$895	0.2		\$179.00								
	2/2/2021 Healey, Christopher J.	Prepare correspondence regarding proposed amendment to class definition.	\$895	0.8		\$716.00								
	2/2/2021 Healey, Christopher J.	Review Sonner issue cases in preparation for JOP hearing.	\$895	0.2		\$179.00								
	2/2/2021 Healey, Christopher J.	Review discovery correspondence.	\$895	0.1		\$89.50								
	2/2/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding settlement status.	\$895	0.2		\$179.00								
	2/2/2021 Healey, Christopher J.	Telephone conference with Attorney Needham regarding Sunrise corporate issues.	\$895	0.2		\$179.00								
	2/2/2021 Healey, Christopher J.	Correspondence regarding jury trial status.	\$895	0.1		\$89.50								
	2/2/2021 Myrick, Tracy R.	Download defendant document production and provide caseteam link to location.	\$195	0.4		\$78.00								
	2/2/2021 Valero, Carmen A.	Research federal CA case law citing to Sonner and denying defendant's MTD or other motions, for C. Healey.	\$360	1		\$360.00								
	2/3/2021 Healey, Christopher J.	Prepare correspondence regarding amended class definition.	\$895	0.2		\$179.00								
	2/3/2021 Healey, Christopher J.	Prepare correspondence regarding final document requests.	\$895	0.2		\$179.00								
	2/3/2021 Healey, Christopher J.	Prepare correspondence to Carmen Valero regarding research of additional 30(b)(6) deposition.	\$895	0.1		\$89.50								
	2/3/2021 Healey, Christopher J.	Review operating budget and prepare correspondence regarding Sunrise facilities.	\$895	1.2		\$1,074.00								
	2/3/2021 Healey, Christopher J.	Prepare correspondence to Attorney Marks' team regarding same.	\$895	0.2		\$179.00								
	2/3/2021 Healey, Christopher J.	Review Attorney Stebner's memo regarding authority to bind.	\$895	0.1		\$89.50								
	2/3/2021 Healey, Christopher J.	Correspondence regarding updated settlement offer.	\$895	0.2		\$179.00								
	2/3/2021 Healey, Christopher J.	Outline final discovery requests.	\$895	0.2		\$179.00								
	2/3/2021 Healey, Christopher J.	Prepare for JOP hearing.	\$895	1		\$895.00								
	2/3/2021 Healey, Christopher J.	Correspondence regarding Rule 16 issue.	\$895	0.2		\$179.00								
	2/3/2021 Healey, Christopher J.	Correspondence regarding timing on discovery stay.	\$895	0.2		\$179.00								
	2/4/2021 Healey, Christopher J.	Draft discovery requests.	\$895	0.2		\$179.00								
	2/4/2021 Healey, Christopher J.	Prepare for JOP hearing and Schroyer hearing.	\$895	1		\$895.00								
	2/4/2021 Healey, Christopher J.	Correspondence regarding discovery issues.	\$895	0.2		\$179.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	2/4/2021 Healey, Christopher J.	Telephone conference with Attorney Warren regarding Falkenberg opposition.	\$895	0.3		\$268.50									
	2/4/2021 Healey, Christopher J.	Research and analysis regarding Lamp Plus and related issues.	\$895	0.7		\$626.50									
	2/4/2021 Healey, Christopher J.	Prepare correspondence to Attorney Warren regarding same.	\$895	0.3		\$268.50									
	2/4/2021 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding potential claims.	\$895	0.3		\$268.50									
	2/4/2021 Myrick, Tracy R.	Communication with B. Umpierre requesting copy of Sunward003 Production.	\$195	0.1		\$19.50									
	2/4/2021 Myrick, Tracy R.	Upload Sunward003 production to shared drive.	\$195	0.4		\$78.00									
	2/5/2021 Healey, Christopher J.	Correspondence regarding Lacey deposition.	\$895	0.1		\$89.50									
	2/5/2021 Healey, Christopher J.	Prepare correspondence regarding Falkenberg opposition.	\$895	0.5		\$447.50						0.5	447.50		
	2/5/2021 Healey, Christopher J.	Prepare correspondence regarding final requests for production.	\$895	0.1		\$89.50									
	2/6/2021 Healey, Christopher J.	Prepare correspondence to Attorney Warren regarding arbitration stay issue.	\$895	0.1		\$89.50									
	2/6/2021 Healey, Christopher J.	Review Sunrise (redacted) reply briefs to Patrick Kennedy and Cristina Flores.	\$895	0.2		\$179.00									
	2/8/2021 Healey, Christopher J.	Telephone conference with Attorneys Warren and Johnson regarding Falkenberg opposition.	\$895	0.4		\$358.00						0.4	358.00		
	2/8/2021 Healey, Christopher J.	Correspondence regarding Sunrise CEO.	\$895	0.1		\$89.50									
	2/8/2021 Healey, Christopher J.	Review and revise final document requests and interrogatories.	\$895	1		\$895.00									
	2/8/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$895	1		\$895.00									
	2/8/2021 Healey, Christopher J.	Research regarding FRCP 45 document requests and correspondence regarding same.	\$895	0.5		\$447.50									
	2/9/2021 Healey, Christopher J.	Review court order denying motion for class certification.	\$895	0.2		\$179.00									
	2/9/2021 Healey, Christopher J.	Correspondence with team regarding amended class certification motion.	\$895	0.2		\$179.00									
	2/9/2021 Healey, Christopher J.	Outline amended motion for class certification.	\$895	0.3		\$268.50									
	2/9/2021 Healey, Christopher J.	Prepare for Lieff call	\$895	0.3		\$268.50									
	2/9/2021 Healey, Christopher J.	Conference call with Lieff regarding Sunrise.	\$895	1.5		\$1,342.50									
	2/10/2021 Healey, Christopher J.	Revise exposure analysis.	\$895	0.2		\$179.00									
	2/10/2021 Healey, Christopher J.	Prepare correspondence to Mediator Kaplan regarding class certification ruling.	\$895	0.5		\$447.50									
	2/10/2021 Healey, Christopher J.	Prepare correspondence to firm management regarding Judge Staton's decision.	\$895	0.5		\$447.50		0.5	447.50						
	2/10/2021 Healey, Christopher J.	Telephone conference with Attorney Warren regarding class issues (.1) and Falkenberg status (.1).	\$895	0.2		\$179.00						0.1	89.50		
	2/10/2021 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding settlement status.	\$895	0.2		\$179.00									
	2/10/2021 Healey, Christopher J.	Review correspondence regarding investigation efforts.	\$895	0.2		\$179.00									
	2/10/2021 Healey, Christopher J.	Prepare correspondence to team regarding injunctive relief.	\$895	0.2		\$179.00									
	2/10/2021 Myrick, Tracy R.	Upload SUN038 Privilege Log from defendant and provide caseteam link to location.	\$195	0.1		\$19.50									
	2/10/2021 Myrick, Tracy R.	Update production log.	\$195	0.1		\$19.50									
	2/11/2021 Healey, Christopher J.	Review correspondence regarding Rachel Evans' correspondence.	\$895	0.1		\$89.50									
	2/11/2021 Healey, Christopher J.	Prepare correspondence regarding potential arbitration subclass.	\$895	0.2		\$179.00									
	2/11/2021 Healey, Christopher J.	Revise discovery responses.	\$895	0.8		\$716.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	2/11/2021 Healey, Christopher J.	Review and respond to Attorney Marks' email regarding missing assessment data.	\$895	0.3		\$268.50									
	2/11/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding status and assessment data.	\$895	0.2		\$179.00									
	2/11/2021 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding discovery requests.	\$895	0.2		\$179.00									
	2/11/2021 Healey, Christopher J.	Review discovery meet and confer summary.	\$895	0.1		\$89.50									
	2/11/2021 Myrick, Tracy R.	Download documents provided by J. Thornton and provide caseteam link to location.	\$195	0.3		\$58.50									
	2/12/2021 Healey, Christopher J.	Correspondence with team regarding research requests.	\$895	0.1		\$89.50									
	2/12/2021 Healey, Christopher J.	Correspondence with Attorney Wallace regarding class definition and arbitration issues.	\$895	0.2		\$179.00									
	2/12/2021 Healey, Christopher J.	Telephone conference with Attorney Winn regarding arbitration issues.	\$895	0.2		\$179.00									
	2/12/2021 Healey, Christopher J.	Review Sunrise declaration regarding "non-arbitration" group.	\$895	0.5		\$447.50									
	2/12/2021 Healey, Christopher J.	Correspondence regarding resident ID on billed service issues.	\$895	0.1		\$89.50									
	2/12/2021 Healey, Christopher J.	Prepare correspondence regarding potential impact of Garcia preparation decision.	\$895	0.1		\$89.50									
	2/12/2021 Healey, Christopher J.	Telephone conference with discovery team regarding class definition and discovery request.	\$895	0.8		\$716.00				0.8	716.00				
	2/12/2021 Healey, Christopher J.	Prepare correspondence to team regarding amended class definition.	\$895	0.3		\$268.50									
	2/12/2021 Healey, Christopher J.	Revise discovery requests.	\$895	1.4		\$1,253.00									
	2/12/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.2		\$179.00									
	2/12/2021 Healey, Christopher J.	Prepare correspondence to Pat Kennedy regarding final discovery issues.	\$895	0.2		\$179.00									
	2/12/2021 Healey, Christopher J.	Revise discovery requests.	\$895	0.1		\$89.50									
	2/12/2021 Healey, Christopher J.	Review Sunrise discovery position email.	\$895	0.1		\$89.50									
	2/12/2021 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding settlement status.	\$895	0.2		\$179.00									
	2/13/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding request for production of documents.	\$895	0.2		\$179.00									
	2/13/2021 Healey, Christopher J.	Revise request for production of documents, set nine.	\$895	0.1		\$89.50									
	2/13/2021 Healey, Christopher J.	Draft 30(b)(6) notice.	\$895	1.3		\$1,163.50									
	2/13/2021 Healey, Christopher J.	Draft amended motion for class certification.	\$895	0.1		\$89.50									
	2/15/2021 Healey, Christopher J.	Outline Lacey deposition objectives.	\$895	0.2		\$179.00									
	2/15/2021 Healey, Christopher J.	Prepare to-do list.	\$895	0.2		\$179.00									
	2/15/2021 Healey, Christopher J.	Continue drafting amended motion for class certification.	\$895	2.5		\$2,237.50									
	2/15/2021 Healey, Christopher J.	Outline legal research issues regarding motion.	\$895	0.1		\$89.50									
	2/15/2021 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding settlement call to Charlie Lee.	\$895	0.2		\$179.00									
	2/15/2021 Healey, Christopher J.	Review cases citing Spann on CLRA class certification.	\$895	0.3		\$268.50									
	2/16/2021 Healey, Christopher J.	Correspondence with Attorney Stebner regarding settlement discussions.	\$895	0.2		\$179.00									
	2/16/2021 Healey, Christopher J.	Telephone conference with Attorney Ross regarding research assignment for class brief.	\$895	0.3		\$268.50									
	2/16/2021 Healey, Christopher J.	Correspondence with Attorney Ross regarding research assignment.	\$895	0.1		\$89.50									
	2/16/2021 Healey, Christopher J.	Analysis regarding JOP ruling and Pulaski issue.	\$895	1.5		\$1,342.50									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		CC Confs	Falkenberg	Travel
				<u>Worked</u>			General	Fees			
	2/16/2021 Healey, Christopher J.	Review and revise request for production of documents.	\$895	0.3		\$268.50					
	2/16/2021 Healey, Christopher J.	Draft amended class certification motion.	\$895	1.5		\$1,342.50					
	2/16/2021 Healey, Christopher J.	Further telephone conference with Attorney Stebner regarding settlement status.	\$895	0.3		\$268.50					
	2/16/2021 Ross, Rachel L.	Strategy discussion with C. Healey regarding research assignment.	\$445	0.1		\$44.50	0.1	44.5			
	2/16/2021 Ross, Rachel L.	Review related briefs and documentation	\$445	0.3		\$133.50	0.3	133.5			
	2/17/2021 Healey, Christopher J.	Draft amended class certification motion.	\$895	2.2		\$1,969.00					
	2/17/2021 Healey, Christopher J.	Revise Rule 30(b)(6) deposition requirements.	\$895	0.2		\$179.00					
	2/17/2021 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding same.	\$895	0.1		\$89.50					
	2/17/2021 Healey, Christopher J.	Telephone conference with Attorneys Stebner and Marks regarding settlement.	\$895	0.3		\$268.50					
	2/17/2021 Healey, Christopher J.	Prepare correspondence regarding exposure analysis.	\$895	0.1		\$89.50					
	2/18/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Ginder deposition and CLM inspection.	\$895	0.1		\$89.50					
	2/18/2021 Healey, Christopher J.	Correspondence regarding CLM inspection.	\$895	0.1		\$89.50					
	2/18/2021 Healey, Christopher J.	Prepare correspondence regarding Watermark subpoena.	\$895	0.1		\$89.50					
	2/18/2021 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding amended class definition.	\$895	0.1		\$89.50					
	2/18/2021 Healey, Christopher J.	Telephone conference with Lindsay Petite regarding damage analysis.	\$895	0.2		\$179.00					
	2/18/2021 Healey, Christopher J.	Revise Rule 30(b)(6) deposition notice.	\$895	0.4		\$358.00					
	2/18/2021 Healey, Christopher J.	Prepare correspondence to team regarding Rule 30(b)(6) deposition notice.	\$895	0.1		\$89.50					
	2/18/2021 Healey, Christopher J.	Draft amended motion for class certification.	\$895	1.2		\$1,074.00					
	2/18/2021 Healey, Christopher J.	Correspondence regarding CLM inspection scheduling.	\$895	0.2		\$179.00					
	2/18/2021 Healey, Christopher J.	Further drafting of amended class certification motion.	\$895	0.8		\$716.00					
	2/18/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding settlement analysis and status.	\$895	0.2		\$179.00					
	2/18/2021 Healey, Christopher J.	Research CA fed court cases on whether a trial court can consider an amended class definition on a motion for class certification, for C. Healey.	\$360	2		\$720.00					
	2/19/2021 Healey, Christopher J.	Draft amended class certification motion.	\$895	1.4		\$1,253.00					
	2/19/2021 Healey, Christopher J.	Legal research regarding case law interpreting elder abuse standard for liability based on "wrongful use"	\$445	1.7		\$756.50	1.7	756.5			
	2/20/2021 Healey, Christopher J.	Prepare questions for Lacey deposition.	\$895	0.7		\$626.50					
	2/21/2021 Healey, Christopher J.	Prepare questions for Lacey deposition.	\$895	3.9		\$3,490.50	1.95	17,452.50			
	2/21/2021 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding key documents.	\$895	0.4		\$358.00					
	2/21/2021 Healey, Christopher J.	Prepare to-do list.	\$895	0.1		\$89.50					
	2/22/2021 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding Lacey deposition.	\$895	0.1		\$89.50					
	2/22/2021 Healey, Christopher J.	Prepare correspondence to Carmen Valero regarding Lacey background.	\$895	0.1		\$89.50					
	2/22/2021 Healey, Christopher J.	Prepare correspondence to Carmen Valero regarding cases regarding notice to putative class members of dismissal.	\$895	0.1		\$89.50					
	2/22/2021 Healey, Christopher J.	Draft Lacey deposition objectives/questions.	\$895	4.4		\$3,938.00	2.2	1,969.00			
	2/22/2021 Healey, Christopher J.	Further telephone conference with Attorney Marks regarding deposition preparation.	\$895	0.2		\$179.00					

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	2/22/2021 Healey, Christopher J.	Prepare correspondence to team regarding Lacey timeline and deposition preparation.	\$895	0.2	\$179.00								
	2/22/2021 Ross, Rachel L.	Legal research regarding case law interpreting elder abuse standard for liability based on "wrongful use"	\$445	0.8	\$356.00	0.8	356						
	2/23/2021 Healey, Christopher J.	Correspondence regarding Lacey deposition preparation.	\$895	0.2	\$179.00								
	2/23/2021 Healey, Christopher J.	Outline Lacey deposition questions.	\$895	2.5	\$2,237.50								
	2/23/2021 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding case status.	\$895	0.1	\$89.50								
	2/23/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Lacey deposition preparation.	\$895	0.1	\$89.50								
	2/23/2021 Healey, Christopher J.	Follow-up correspondence regarding deposition preparation.	\$895	0.1	\$89.50								
	2/23/2021 Healey, Christopher J.	Further correspondence regarding Lacey deposition.	\$895	0.5	\$447.50								
	2/23/2021 Healey, Christopher J.	Review Lacey deposition outline.	\$895	0.3	\$268.50								
	2/23/2021 Healey, Christopher J.	Correspondence with Attorney Ross regarding injunction issue and review McGill decision.	\$895	0.3	\$268.50								
	2/23/2021 Myrick, Tracy R.	Download Defendant Production and provide caseteam link to location; update production log regarding same.	\$195	0.3	\$58.50								
	2/23/2021 Ross, Rachel L.	Legal research regarding case law interpreting elder abuse standard for liability based on "wrongful use"	\$445	2.8	\$1,246.00	2.8	1246						
	2/23/2021 Ross, Rachel L.	Legal research regarding the standards and benefits of obtaining a UCL injunction	\$445	3	\$1,335.00	3	1335						
	2/24/2021 Healey, Christopher J.	Review Attorney Marks' correspondence regarding SEC document.	\$895	0.1	\$89.50								
	2/24/2021 Healey, Christopher J.	Prepare correspondence regarding responses to Sunrise discovery requests.	\$895	0.1	\$89.50								
	2/24/2021 Healey, Christopher J.	Prepare correspondence regarding "inconsistencies" statement in Lacey documents.	\$895	0.2	\$179.00								
	2/24/2021 Healey, Christopher J.	Review key documents regarding CLM.	\$895	0.5	\$447.50								
	2/24/2021 Healey, Christopher J.	Review Ms. Valero's research regarding amended class definition.	\$895	0.5	\$447.50								
	2/24/2021 Healey, Christopher J.	Respond to inquiry regarding house duties.	\$895	0.1	\$89.50								
	2/24/2021 Healey, Christopher J.	Prepare for Lacey deposition and correspondence regarding same.	\$895	1	\$895.00								
	2/24/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Lacey deposition.	\$895	1.2	\$1,074.00								
	2/24/2021 Healey, Christopher J.	Correspondence regarding Lacey deposition preparation.	\$895	0.8	\$716.00								
	2/24/2021 Healey, Christopher J.	Prepare correspondence regarding CLM staffing formula.	\$895	0.1	\$89.50								
	2/24/2021 Valero, Carmen A.	Research cases addressing issue of court's notice to putative class members regarding denial of class certification, for C. Healey.	\$360	2	\$720.00								
	2/24/2021 Ross, Rachel L.	Legal research regarding the benefit of litigating under the UCL on a class wide basis without class certification	\$445	2.9	\$1,290.50	2.9	1290.5						
	2/24/2021 Ross, Rachel L.	Analyze research findings and compile into memorandum for C. Healey	\$445	0.5	\$222.50	0.5	222.5						
	2/25/2021 Healey, Christopher J.	Correspondence regarding simulation analysis.	\$895	0.1	\$89.50								
	2/25/2021 Healey, Christopher J.	Prepare correspondence regarding Lacey deposition preparation and 25% percentile approach.	\$895	0.2	\$179.00								
	2/25/2021 Healey, Christopher J.	Prepare correspondence regarding priority deposition questions.	\$895	0.2	\$179.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	2/25/2021 Healey, Christopher J.	Review defendants' discovery requests.	\$895	0.1	\$89.50								
	2/25/2021 Healey, Christopher J.	Prepare correspondence regarding trial exhibit issues.	\$895	0.1	\$89.50								
	2/25/2021 Healey, Christopher J.	Prepare correspondence regarding defense counsel's trial experience.	\$895	0.1	\$89.50								
	2/25/2021 Healey, Christopher J.	Draft amended class certification brief.	\$895	0.4	\$358.00								
	2/25/2021 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$895	0.2	\$179.00								
	2/25/2021 Healey, Christopher J.	Follow-up correspondence regarding class definition issues.	\$895	0.2	\$179.00								
	2/25/2021 Ross, Rachel L.	Analyze and summarize research findings into memorandum for amended motion	\$445	0.7	\$311.50	0.7	311.5						
	2/26/2021 Healey, Christopher J.	Prepare correspondence regarding amended class definition.	\$895	0.2	\$179.00								
	2/26/2021 Healey, Christopher J.	Revise amended class motion.	\$895	0.2	\$179.00								
	2/26/2021 Healey, Christopher J.	Correspondence with expert Patrick Kennedy regarding case status.	\$895	0.1	\$89.50								
	2/26/2021 Healey, Christopher J.	Review and respond to Attorney Ross' research on financial elder abuse.	\$895	0.2	\$179.00								
	2/26/2021 Healey, Christopher J.	Research and analysis regarding potential notice regarding class denial.	\$895	1	\$895.00								
	2/26/2021 Healey, Christopher J.	Prepare for Patrick Kennedy call.	\$895	0.1	\$89.50								
	2/26/2021 Healey, Christopher J.	Telephone conference with Patrick Kennedy regarding expert report and status.	\$895	0.4	\$358.00								
	2/26/2021 Healey, Christopher J.	Telephone conference with Attorney Johnson regarding trial evidence issues.	\$895	0.2	\$179.00								
	2/26/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding Sunrise discovery requests on cost issues.	\$895	0.2	\$179.00								
	2/26/2021 Healey, Christopher J.	Revise amended class motion.	\$895	0.5	\$447.50								
	2/26/2021 Healey, Christopher J.	Follow-up correspondence to Patrick Kennedy's office.	\$895	0.1	\$89.50								
	2/26/2021 Healey, Christopher J.	Prepare correspondence regarding Lacey deposition and Rule 30(b)(6) notice.	\$895	0.2	\$179.00								
	2/26/2021 Healey, Christopher J.	Outline case schedule.	\$895	0.2	\$179.00								
	2/26/2021 Healey, Christopher J.	Prepare correspondence regarding witness discovery issues.	\$895	0.1	\$89.50								
	2/26/2021 Valero, Carmen A.	Research and compile litigation analytics reports on Gibson Dunn defense counsel, for C. Healey.	\$360	1	\$360.00								
	2/26/2021 Ross, Rachel L.	Legal research regarding cases granting class certification on elder abuse claims that also involved CLRA claims	\$445	3.3	\$1,468.50	3.3	1468.5						
	2/27/2021 Healey, Christopher J.	Correspondence with Attorney Marks regarding Lacey deposition.	\$895	0.2	\$179.00								
	2/27/2021 Healey, Christopher J.	Outline revisions to class motion.	\$895	0.2	\$179.00								
	2/28/2021 Healey, Christopher J.	Review Lacey deposition transcript.	\$895	2.7	\$2,416.50								
	2/28/2021 Healey, Christopher J.	Research regarding Med Summit Solutions and consultants.	\$895	0.3	\$268.50								
	2/28/2021 Healey, Christopher J.	Prepare correspondence to team regarding Lacey deposition follow-up.	\$895	0.5	\$447.50								
	2/28/2021 Healey, Christopher J.	Review Lacey deposition exhibits.	\$895	0.2	\$179.00								
	3/1/2021 Healey, Christopher J.	Revise 30(b)(6) deposition notice.	\$895	0.5	\$447.50								
	3/1/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.1	\$89.50								
	3/1/2021 Healey, Christopher J.	Telephone message from Attorney Sitar regarding Watermark and prepare correspondence to team regarding same.	\$895	0.2	\$179.00								
	3/1/2021 Healey, Christopher J.	Review background information regarding Med Summit.	\$895	0.1	\$89.50								
	3/1/2021 Healey, Christopher J.	Prepare correspondence regarding case status and scheduling.	\$895	0.2	\$179.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	3/1/2021 Healey, Christopher J.	Telephone conference with Attorney Sitar regarding Watermark subpoena.	\$895	0.2		\$179.00									
	3/1/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.2		\$179.00									
	3/1/2021 Healey, Christopher J.	Review Attorney Marks' revisions to Rule 30(b)(6) deposition notice.	\$895	0.2		\$179.00									
	3/1/2021 Healey, Christopher J.	Telephone conference with Patrick Kennedy regarding rent issue.	\$895	0.1		\$89.50									
	3/1/2021 Healey, Christopher J.	Further revisions to Rule 30(b)(6) deposition notice.	\$895	0.5		\$447.50									
	3/1/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Lacey deposition and to do issues.	\$895	1.3		\$1,163.50	0.3	268.50							
	3/1/2021 Healey, Christopher J.	Review and revise Watermark questions.	\$895	0.2		\$179.00									
	3/1/2021 Healey, Christopher J.	Review and revise meet and confer correspondence regarding time standards and CLM.	\$895	0.3		\$268.50									
	3/1/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Ginder deposition.	\$895	0.1		\$89.50									
	3/1/2021 Healey, Christopher J.	Further revisions to Rule 30(b)(6) deposition notice.	\$895	1.6		\$1,432.00									
	3/1/2021 Healey, Christopher J.	Correspondence with Attorney Thamer regarding deposition and trial preparation.	\$895	0.2		\$179.00									
	3/1/2021 Healey, Christopher J.	Prepare correspondence to team regarding Rule 30(b)(6) deposition notice.	\$895	0.2		\$179.00									
	3/1/2021 Valero, Carmen A.	Research background of Mark Gunlicks, Mike Belforte, and MedSummit Solutions, for potentio depo subpoenas, for C. Healey.	\$360	1		\$360.00									
	3/2/2021 Healey, Christopher J.	Prepare correspondence regarding Ginder deposition preparation.	\$895	0.1		\$89.50									
	3/2/2021 Healey, Christopher J.	Prepare correspondence to Attorneys Umpierre and Johnson regarding discovery issues.	\$895	0.4		\$358.00									
	3/2/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding status and class brief.	\$895	0.2		\$179.00									
	3/2/2021 Healey, Christopher J.	Correspondence with Attorney Sitar regarding Watermark subpoena.	\$895	0.1		\$89.50									
	3/2/2021 Healey, Christopher J.	Prepare for Watermark call.	\$895	0.1		\$89.50									
	3/2/2021 Healey, Christopher J.	Conference call with Attorneys Umpierre and Johnson regarding discovery game.	\$895	1		\$895.00									
	3/2/2021 Healey, Christopher J.	Revise 30(B)(6) deposition notice.	\$895	0.3		\$268.50									
	3/2/2021 Healey, Christopher J.	Prepare correspondence regarding meet and confer regarding class notices.	\$895	0.1		\$89.50									
	3/2/2021 Healey, Christopher J.	Telephone conference with Watermark's counsel regarding subpoena.	\$895	0.2		\$179.00									
	3/2/2021 Healey, Christopher J.	Review and revise Rule 30(B)(6) deposition notice.	\$895	0.2		\$179.00									
	3/2/2021 Healey, Christopher J.	Prepare correspondence regarding case schedule.	\$895	0.1		\$89.50									
	3/2/2021 Healey, Christopher J.	Prepare for Ginder deposition.	\$895	0.8		\$716.00									
	3/2/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding CM hours calculation.	\$895	0.2		\$179.00									
	3/2/2021 Healey, Christopher J.	Follow-up analysis regarding same.	\$895	0.2		\$179.00									
	3/2/2021 Valero, Carmen A.	Research background on Shayne Ginder, for C. Healey.	\$360	0.2		\$72.00									
	3/3/2021 Healey, Christopher J.	Review and comment regarding draft meet and confer letter.	\$895	0.3		\$268.50									
	3/3/2021 Healey, Christopher J.	Revise amended class certification motion.	\$895	2.4		\$2,148.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	3/3/2021 Healey, Christopher J.	Telephone conference with James Thornton regarding 25th percentile and related issues.	\$895	0.6		\$537.00								
	3/3/2021 Healey, Christopher J.	Prepare correspondence to group regarding same.	\$895	0.3		\$268.50								
	3/4/2021 Healey, Christopher J.	Prepare correspondence regarding meet and confer regarding amended class motion.	\$895	0.1		\$89.50								
	3/4/2021 Healey, Christopher J.	Revise amended motion for class certification.	\$895	1.5		\$1,342.50								
	3/4/2021 Healey, Christopher J.	Prepare correspondence regarding witness list.	\$895	0.1		\$89.50								
	3/4/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding follow-up deposition and staffing analysis.	\$895	0.3		\$268.50								
	3/4/2021 Healey, Christopher J.	Correspondence regarding Nobbee deposition.	\$895	0.2		\$179.00								
	3/4/2021 Healey, Christopher J.	Review Nobbee documents.	\$895	0.5		\$447.50								
	3/4/2021 Healey, Christopher J.	Revise amended class certification motion.	\$895	1.2		\$1,074.00								
	3/4/2021 Healey, Christopher J.	Telephone conference with Attorney Johnson regarding Watermark subpoena opposition.	\$895	0.2		\$179.00								
	3/4/2021 Healey, Christopher J.	Follow-up correspondence with Attorney Umpierre regarding same.	\$895	0.1		\$89.50								
	3/4/2021 Healey, Christopher J.	Review background information regarding Tiffany Nobbee.	\$895	0.3		\$268.50								
	3/4/2021 Healey, Christopher J.	Review documents regarding Nobbee work on TCB project.	\$895	1.5		\$1,342.50								
	3/4/2021 Healey, Christopher J.	Correspondence with team regarding same.	\$895	0.2		\$179.00								
	3/4/2021 Valero, Carmen A.	Research background and public records of Tiffany Nobbee, for C. Healey.	\$360	0.3		\$108.00								
	3/5/2021 Healey, Christopher J.	Correspondence with Attorney Johnson regarding Watermark subpoena.	\$895	0.2		\$179.00								
	3/5/2021 Healey, Christopher J.	Prepare correspondence regarding research on ten deposition limit.	\$895	0.1		\$89.50								
	3/5/2021 Healey, Christopher J.	Telephone conference with Attorney Johnson regarding Watermark motion to quash.	\$895	0.1		\$89.50								
	3/5/2021 Healey, Christopher J.	Review correspondence.	\$895	0.1		\$89.50								
	3/5/2021 Healey, Christopher J.	Revise amended class certification motion.	\$895	3.5		\$3,132.50	1	895.00						
	3/5/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.2		\$179.00								
	3/5/2021 Healey, Christopher J.	Review Watermark declaration.	\$895	0.1		\$89.50								
	3/5/2021 Healey, Christopher J.	Prepare correspondence to team regarding deposition.	\$895	0.1		\$89.50								
	3/5/2021 Healey, Christopher J.	Outline arguments regarding additional deposition.	\$895	0.1		\$89.50								
	3/5/2021 Valero, Carmen A.	Research federal cases authorizing more than 10 depositions, for C. Healey.	\$360	0.5		\$180.00								
	3/6/2021 Healey, Christopher J.	Review cases regarding 10+ depositions.	\$895	0.8		\$716.00								
	3/7/2021 Healey, Christopher J.	Outline meet and confer letter regarding additional depositions.	\$895	1.4		\$1,253.00								
	3/8/2021 Healey, Christopher J.	Correspondence regarding ten deposition discovery motion.	\$895	0.2		\$179.00								
	3/8/2021 Healey, Christopher J.	Outline motion regarding additional deposition.	\$895	1.7		\$1,521.50								
	3/8/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$895	0.3		\$268.50								
	3/8/2021 Healey, Christopher J.	Draft motion regarding additional depositions.	\$895	3.7		\$3,311.50	1	895.00						
	3/8/2021 Healey, Christopher J.	Review discovery correspondence.	\$895	0.3		\$268.50								
	3/8/2021 Healey, Christopher J.	Review cases regarding additional entity deposition.	\$895	0.5		\$447.50								
	3/8/2021 Healey, Christopher J.	Prepare correspondence regarding entity deposition notice.	\$895	0.5		\$447.50								
	3/8/2021 Howard, Kathryn M.	Analysis of Amended Motion for Class Certification including cite check and auto cite negative case history and revised same.	\$325	2.7		\$877.50								
	3/8/2021 Howard, Kathryn M.	Prepared email to C. Healey regarding same.	\$325	0.1		\$32.50								
	3/8/2021 Myrick, Tracy R.	Prepare searches in Relativity with regard to "peak" and provide caseteam spreadsheets showing results.	\$195	0.6		\$117.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	3/8/2021 Myrick, Tracy R.	Provide spreadsheet to caseteam containing metadata defendant produced for SUN0137586.	\$195	0.3	\$58.50								
	3/9/2021 Healey, Christopher J.	Prepare correspondence regarding Judge Staton's pre-trial procedures.	\$895	0.2	\$179.00								
	3/9/2021 Healey, Christopher J.	Review Attorney Marks' correspondence regarding discrepancy between assessments and census data.	\$895	0.1	\$89.50								
	3/9/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding same.	\$895	0.2	\$179.00								
	3/9/2021 Healey, Christopher J.	Review correspondence regarding trial preparation schedule.	\$895	0.1	\$89.50								
	3/9/2021 Healey, Christopher J.	Prepare correspondence regarding Watermark declaration.	\$895	0.1	\$89.50								
	3/9/2021 Healey, Christopher J.	Review documents/background regarding witness Mike Belfortz.	\$895	0.5	\$447.50								
	3/9/2021 Healey, Christopher J.	Review privilege logs.	\$895	0.2	\$179.00								
	3/9/2021 Healey, Christopher J.	Prepare correspondence regarding missing Sunrise documents.	\$895	0.1	\$89.50								
	3/9/2021 Healey, Christopher J.	Revise amended class motion.	\$895	0.5	\$447.50								
	3/9/2021 Healey, Christopher J.	Prepare correspondence regarding same.	\$895	0.1	\$89.50								
	3/9/2021 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding witness issues.	\$895	0.2	\$179.00								
	3/9/2021 Healey, Christopher J.	Prepare correspondence regarding Watermark subpoena.	\$895	0.1	\$89.50								
	3/9/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre and Attorney Johnson regarding discovery meet and confer.	\$895	0.5	\$447.50								
	3/9/2021 Healey, Christopher J.	Correspondence regarding 30(b)(6) entity deposition.	\$895	0.2	\$179.00								
	3/9/2021 Healey, Christopher J.	Prepare correspondence regarding amended complaint.	\$895	0.1	\$89.50								
	3/9/2021 Healey, Christopher J.	Review revisions to amended class motion.	\$895	0.2	\$179.00								
	3/9/2021 Healey, Christopher J.	Draft motion regarding ten deposition issue.	\$895	1	\$895.00								
	3/9/2021 Healey, Christopher J.	Draft meet and confer letter regarding privilege issues.	\$895	0.4	\$358.00								
	3/9/2021 Myrick, Tracy R.	Telephone conference with Jim Thornton regarding Resident ID extraction project.	\$195	0.3	\$58.50								
	3/9/2021 Myrick, Tracy R.	Work on reviewing San Mateo Assessments and extract Resident ID numbers into an excel spreadsheet.	\$195	1.2	\$234.00								
	3/9/2021 Myrick, Tracy R.	Run searches in Relativity to try to locate attachment to SUN0103932.	\$195	0.2	\$39.00								
	3/10/2021 Healey, Christopher J.	Revise amended class certification motion.	\$895	0.7	\$626.50								
	3/10/2021 Healey, Christopher J.	Review witness list and prepare correspondence regarding same.	\$895	0.8	\$716.00								
	3/10/2021 Healey, Christopher J.	Correspondence regarding amended class certification filing.	\$895	0.1	\$89.50								
	3/10/2021 Healey, Christopher J.	Prepare for Ginder/Nobbee depositions.	\$895	0.5	\$447.50								
	3/10/2021 Healey, Christopher J.	Review status update regarding shortfall analysis.	\$895	0.1	\$89.50								
	3/10/2021 Healey, Christopher J.	Draft status correspondence to team.	\$895	0.5	\$447.50								
	3/10/2021 Healey, Christopher J.	Follow-up correspondence regarding same.	\$895	0.1	\$89.50								
	3/10/2021 Healey, Christopher J.	Draft meet and confer request regarding case schedule.	\$895	0.2	\$179.00								
	3/10/2021 Healey, Christopher J.	Prepare correspondence regarding additional Sunrise witnesses.	\$895	0.2	\$179.00								
	3/10/2021 Healey, Christopher J.	Review Sunrise documents and prepare for depositions.	\$895	2	\$1,790.00								
	3/10/2021 Healey, Christopher J.	Correspondence regarding amended class motion.	\$895	0.1	\$89.50								
	3/10/2021 Healey, Christopher J.	Telephone conference with Attorneys Umpierre and Marks regarding discovery meet and confer.	\$895	0.3	\$268.50								
	3/10/2021 Healey, Christopher J.	Outline key points on case schedule stipulation.	\$895	0.1	\$89.50								
	3/10/2021 Healey, Christopher J.	Correspondence with Attorney Johnson regarding Defendants' case proposal.	\$895	0.1	\$89.50								
	3/10/2021 Myrick, Tracy R.	Download defendant production and provide caseteam link to location.	\$195	0.3	\$58.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>			
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	3/10/2021 Myrick, Tracy R.	Work on inputting Resident ID numbers into template spreadsheet for the San Mateo Assessments and provide to J. Thornton.	\$195	1.5		\$292.50								
	3/10/2021 Myrick, Tracy R.	Review Alta Loma Assessments to capture Resident ID numbers.	\$195	0.4		\$78.00								
	3/10/2021 Myrick, Tracy R.	Work on inputting Resident ID numbers into template spreadsheet regarding same.	\$195	2.1		\$409.50								
	3/10/2021 Myrick, Tracy R.	Download deposition exhibits from link provided by Court Reporter and provide caseteam link to location.	\$195	0.3		\$58.50								
	3/10/2021 Myrick, Tracy R.	Upload A. Lacey deposition exhibits to office services server per caseteam.	\$195	0.2		\$39.00								
	3/10/2021 Valero, Carmen A.	Research cases construing Judge Staton's trial order or similar orders from other courts, regarding discovery deadline issues, for C. Healey.	\$360	2		\$720.00								
	3/11/2021 Healey, Christopher J.	Telephone conference with Attorneys Johnson and Umpierre regarding discovery status and case schedule issues.	\$895	1		\$895.00								
	3/11/2021 Healey, Christopher J.	Follow-up correspondence regarding same.	\$895	0.1		\$89.50								
	3/11/2021 Healey, Christopher J.	Outline proposed stipulation.	\$895	1.4		\$1,253.00								
	3/11/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.2		\$179.00								
	3/11/2021 Healey, Christopher J.	Review revised case schedule proposal.	\$895	0.1		\$89.50								
	3/11/2021 Myrick, Tracy R.	Work on exporting Beverly Hills Assessments from Relativity database.	\$195	0.5		\$97.50								
	3/11/2021 Myrick, Tracy R.	Review Beverly Hills Assessments to capture Resident ID numbers and work on inputting same into spreadsheet.	\$195	1.5		\$292.50								
	3/12/2021 Healey, Christopher J.	Revise motion regarding deposition requests.	\$895	0.4		\$358.00								
	3/12/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery motions.	\$895	0.3		\$268.50								
	3/12/2021 Healey, Christopher J.	Further revisions to discovery motion regarding deposition.	\$895	1		\$895.00								
	3/12/2021 Myrick, Tracy R.	Review La Jolla Assessments to capture Resident ID numbers.	\$195	0.5		\$97.50								
	3/12/2021 Myrick, Tracy R.	Work on inputting La Jolla Resident ID numbers into spreadsheet regarding same.	\$195	1		\$195.00								
	3/15/2021 Healey, Christopher J.	Draft discovery motion regarding lay witness depositions.	\$895	1.8		\$1,611.00								
	3/15/2021 Healey, Christopher J.	Correspondence regarding case stipulation.	\$895	0.4		\$358.00								
	3/15/2021 Healey, Christopher J.	Prepare correspondence regarding updated witness list.	\$895	0.2		\$179.00								
	3/15/2021 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding settlement issues.	\$895	0.2		\$179.00								
	3/15/2021 Healey, Christopher J.	Further drafting of motion regarding lay witness depositions.	\$895	0.9		\$805.50								
	3/15/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.1		\$89.50								
	3/15/2021 Myrick, Tracy R.	Review Monterey and San Rafael Assessments to capture Resident ID numbers.	\$195	0.8		\$156.00								
	3/15/2021 Myrick, Tracy R.	Work on inputting Resident ID numbers into spreadsheet regarding same.	\$195	2.2		\$429.00								
	3/16/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding assessment data issues.	\$895	0.6		\$537.00								
	3/16/2021 Healey, Christopher J.	Telephone conference with Attorneys Umpierre and Yarnell regarding discovery motions.	\$895	0.5		\$447.50								
	3/16/2021 Healey, Christopher J.	Follow-up correspondence to Attorney Johnson regarding same.	\$895	0.1		\$89.50								
	3/16/2021 Healey, Christopher J.	Telephone conference with Attorney Johnson regarding same.	\$895	0.2		\$179.00								
	3/16/2021 Healey, Christopher J.	Prepare correspondence to team regarding discovery motions timeline.	\$895	0.2		\$179.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	3/16/2021 Healey, Christopher J.	Review updated witness list.	\$895	0.8									
	3/16/2021 Healey, Christopher J.	Office conference regarding same.	\$895	0.2									
	3/16/2021 Myrick, Tracy R.	Upload Privilege Log from SUN040 production and provide caseteam link to location.	\$195	0.1									
	3/16/2021 Myrick, Tracy R.	Attend Team conference call regarding capturing Resident ID Nos. in Assessments for the six facilities.	\$195	1					1	195.00			
	3/16/2021 Myrick, Tracy R.	Work on finalizing spreadsheet containing Resident ID numbers for the six facilities and provide to caseteam.	\$195	3									
	3/16/2021 Myrick, Tracy R.	Work on exporting and organizing various Assessments for the six facilities from Relativity with Resident ID nos. that were not included in the .csv Assessments and also that had the Resident ID nos. redacted throughout the file in preparation of sending to D. Marks and J. Thornton.	\$195	1									
	3/17/2021 Healey, Christopher J.	Review updated witness list.	\$895	1.1									
	3/17/2021 Healey, Christopher J.	Review privilege log.	\$895	0.1									
	3/17/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$895	0.1									
	3/17/2021 Healey, Christopher J.	Draft meet and confer request regarding Kennedy damage issues. prepare correspondence to Attorney Johnson regarding outstanding discovery issues.	\$895	0.2									
	3/17/2021 Healey, Christopher J.	Correspondence regarding Rule 30(b)(6) deposition notice.	\$895	0.1									
	3/17/2021 Healey, Christopher J.	Correspondence regarding discovery requests.	\$895	0.1									
	3/17/2021 Healey, Christopher J.	Review draft stipulation regarding case statement and comments regarding same.	\$895	0.3									
	3/17/2021 Healey, Christopher J.	Review correspondence regarding deposition notices.	\$895	0.2									
	3/17/2021 Healey, Christopher J.	Prepare correspondence regarding Watermark declaration.	\$895	0.1									
	3/17/2021 Healey, Christopher J.	Prepare correspondence regarding research request on privilege log issues.	\$895	0.1									
	3/17/2021 Healey, Christopher J.	Prepare correspondence regarding case/trial preparation schedule. Telephone conference with Attorneys Johnson and Umpierre regarding case stipulation and discovery issues.	\$895	0.1									
	3/17/2021 Healey, Christopher J.	Draft revised stipulation.	\$895	0.8									
	3/17/2021 Healey, Christopher J.	Prepare correspondence to Attorney Warren regarding in-house privilege issue.	\$895	0.1									
	3/17/2021 Myrick, Tracy R.	Prepare and send various Assessments in PDF format to D. Marks and J. Thornton via Dentons secured file share.	\$195	0.5									
	3/17/2021 Valero, Carmen A.	Research case law and judge Early's specific requirements re privilege logs, for C. Healey.	\$360	1									
	3/18/2021 Healey, Christopher J.	Review and revise discovery motion regarding pending request for production of documents.	\$895	1									
	3/18/2021 Healey, Christopher J.	Revise discovery motion regarding depositions.	\$895	0.1									
	3/18/2021 Healey, Christopher J.	Revise witness list.	\$895	0.9									
	3/18/2021 Healey, Christopher J.	Correspondence regarding case schedule stipulation.	\$895	0.1									
	3/18/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery motion regarding pending request for production of documents and case scheduling stipulation.	\$895	0.5									
	3/18/2021 Healey, Christopher J.	Prepare correspondence to Attorney Yarnell regarding deposition motion.	\$895	0.1									

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	3/18/2021 Healey, Christopher J.	Correspondence regarding case schedule stipulation.	\$895	0.1	\$89.50								
	3/19/2021 Healey, Christopher J.	Review and comment on discovery motion regarding pending request for production of documents.	\$895	0.5	\$447.50								
	3/19/2021 Healey, Christopher J.	Prepare correspondence regarding privilege log issues.	\$895	0.1	\$89.50								
	3/19/2021 Healey, Christopher J.	Prepare correspondence regarding discovery motion on final request for production of documents.	\$895	0.1	\$89.50								
	3/19/2021 Healey, Christopher J.	Review correspondence regarding open discovery issues.	\$895	0.2	\$179.00								
	3/19/2021 Healey, Christopher J.	Telephone conference with Attorney Johnson regarding missing Sunrise data.	\$895	0.5	\$447.50								
	3/19/2021 Healey, Christopher J.	Review correspondence regarding same.	\$895	0.2	\$179.00								
	3/19/2021 Healey, Christopher J.	Revise witness disclosure and prepare correspondence to team.	\$895	0.3	\$268.50								
	3/19/2021 Healey, Christopher J.	Review Sunrise's response regarding case stipulation and outline proposed response.	\$895	0.3	\$268.50								
	3/19/2021 Healey, Christopher J.	Correspondence regarding Sunrise's objections to request for production of documents.	\$895	0.1	\$89.50								
	3/19/2021 Valero, Carmen A.	Research 9th Circuit case law re attorney-client privilege and non-attorney correspondence where counsel is copied, for C. Healey.	\$360	1	\$360.00								
	3/20/2021 Healey, Christopher J.	Draft response to Attorney Gorman regarding case schedule stipulation.	\$895	1.3	\$1,163.50								
	3/20/2021 Healey, Christopher J.	Telephone conference with Attorneys Johnson and Umpierre regarding discovery position and case schedule stipulation.	\$895	0.8	\$716.00								
	3/21/2021 Healey, Christopher J.	Revise meet and confer response.	\$895	0.3	\$268.50								
	3/21/2021 Healey, Christopher J.	Follow-up correspondence regarding same.	\$895	0.2	\$179.00								
	3/22/2021 Healey, Christopher J.	Prepare correspondence regarding discovery meet and confer.	\$895	0.2	\$179.00								
	3/22/2021 Healey, Christopher J.	Revise motion regarding additional depositions.	\$895	2	\$1,790.00								
	3/22/2021 Healey, Christopher J.	Review correspondence regarding discovery meet and confer.	\$895	0.2	\$179.00								
	3/22/2021 Healey, Christopher J.	Telephone conference with team regarding discovery conference and stipulation issues.	\$895	0.5	\$447.50			0.5	447.50				
	3/22/2021 Healey, Christopher J.	Prepare correspondence regarding discovery motion.	\$895	0.1	\$89.50								
	3/22/2021 Healey, Christopher J.	Further revisions to motion regarding additional depositions.	\$895	3	\$2,685.00								
	3/23/2021 Healey, Christopher J.	Outline changes to deposition discovery motion.	\$895	0.2	\$179.00								
	3/23/2021 Healey, Christopher J.	Review and revise discovery motion regarding data/CLM issues.	\$895	0.3	\$268.50								
	3/23/2021 Healey, Christopher J.	Prepare correspondence regarding revisions to data motion.	\$895	0.1	\$89.50								
	3/23/2021 Healey, Christopher J.	Office conference regarding deposition discovery motion.	\$895	0.2	\$179.00								
	3/23/2021 Healey, Christopher J.	Prepare correspondence to Attorney Yarnall regarding same.	\$895	0.1	\$89.50								
	3/23/2021 Healey, Christopher J.	Revise deposition discovery motion.	\$895	1.8	\$1,611.00								
	3/23/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$895	0.3	\$268.50								
	3/23/2021 Healey, Christopher J.	Revise deposition discovery motion and supporting Umpierre declaration.	\$895	2	\$1,790.00								
	3/23/2021 Healey, Christopher J.	Review Gibson's meet and confer correspondence regarding data issues.	\$895	0.1	\$89.50								
	3/23/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$895	0.2	\$179.00								
	3/23/2021 Healey, Christopher J.	Prepare correspondence to team regarding proposed response.	\$895	0.2	\$179.00								
	3/23/2021 Healey, Christopher J.	Review and revise response to Sunrise regarding data issues.	\$895	0.1	\$89.50								
	3/23/2021 Howard, Kathryn M.	Analysis of Joint Stipulation Regarding Plaintiff's Motion Regarding Law Witness Depositions including cite checking and reviewing negative case history.	\$325	1.9	\$617.50								
	3/23/2021 Howard, Kathryn M.	Reviewed and revised cited cases and stipulation.	\$325	0.4	\$130.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	3/23/2021 Howard, Kathryn M.	Prepared email to C. Healey regarding same.	\$325	0.1		\$32.50								
	3/23/2021 Howard, Kathryn M.	Email exchanges regarding same.	\$325	0.1		\$32.50								
	3/24/2021 Healey, Christopher J.	Correspondence with team regarding Sunrise's supplemental production.	\$895	0.1		\$89.50								
	3/24/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding CLM inspection.	\$895	0.1		\$89.50								
	3/24/2021 Healey, Christopher J.	Revise response to Attorney Gorman regarding case stipulation and related issues.	\$895	0.6		\$537.00								
	3/24/2021 Healey, Christopher J.	Revise deposition discovery motion.	\$895	0.8		\$716.00								
	3/24/2021 Healey, Christopher J.	Office conference regarding same.	\$895	0.1		\$89.50								
	3/24/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery status.	\$895	0.1		\$89.50								
	3/24/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Gibson's response on stipulation.	\$895	0.1		\$89.50								
	3/24/2021 Healey, Christopher J.	Review and comment on draft stipulation.	\$895	0.2		\$179.00								
	3/24/2021 Healey, Christopher J.	Review deposition discovery motion and supporting declaration.	\$895	0.2		\$179.00								
	3/24/2021 Healey, Christopher J.	Review and comment regarding Plaintiffs' response to Request for Production/Interrogatories.	\$895	0.2		\$179.00								
	3/24/2021 Healey, Christopher J.	Correspondence regarding case scheduling stipulation.	\$895	0.2		\$179.00								
	3/24/2021 Healey, Christopher J.	Prepare correspondence regarding final discovery.	\$895	0.1		\$89.50								
	3/25/2021 Healey, Christopher J.	Prepare correspondence to Patrick Kennedy's office regarding case stipulation.	\$895	0.1		\$89.50								
	3/25/2021 Healey, Christopher J.	Review correspondence on discovery filings and service.	\$895	0.1		\$89.50								
	3/25/2021 Healey, Christopher J.	Prepare correspondence to defendants' counsel regarding discovery motions.	\$895	0.2		\$179.00								
	3/25/2021 Healey, Christopher J.	Review witness list.	\$895	0.1		\$89.50								
	3/25/2021 Healey, Christopher J.	Review and revise final discovery motions.	\$895	1.4		\$1,253.00								
	3/25/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding final discovery motions.	\$895	0.2		\$179.00								
	3/25/2021 Healey, Christopher J.	Further revisions and inserts to final discovery motions.	\$895	0.8		\$716.00								
	3/25/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$895	0.1		\$89.50								
	3/25/2021 Healey, Christopher J.	Review follow-up correspondence regarding same.	\$895	0.1		\$89.50								
	3/26/2021 Healey, Christopher J.	Review and revise final discovery motion.	\$895	2.5		\$2,237.50								
	3/26/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Gibson's requested extension.	\$895	0.1		\$89.50								
	3/26/2021 Healey, Christopher J.	Correspondence regarding Gibson's request for extension on discovery motion.	\$895	0.1		\$89.50								
	3/26/2021 Healey, Christopher J.	Review updated motion on final discovery requests and supporting Umpierre declaration.	\$895	0.2		\$179.00								
	3/26/2021 Healey, Christopher J.	Prepare correspondence regarding same.	\$895	0.1		\$89.50								
	3/29/2021 Healey, Christopher J.	Review Gibson's letter regarding privilege log.	\$895	0.1		\$89.50								
	3/29/2021 Healey, Christopher J.	Prepare correspondence regarding witness updated list.	\$895	0.1		\$89.50								
	3/29/2021 Healey, Christopher J.	Prepare correspondence regarding MedSummit preservation letter.	\$895	0.1		\$89.50								
	3/29/2021 Healey, Christopher J.	Review court order regarding case schedule.	\$895	0.1		\$89.50								
	3/29/2021 Healey, Christopher J.	Outline pretrial schedule.	\$895	0.5		\$447.50								
	3/29/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.3		\$268.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	3/29/2021 Myrick, Tracy R.	Work with caseteam to obtain Plaintiff 12/15/2020 production, upload Plaintiff production and provide caseteam link to location.	\$195	0.2		\$39.00									
	3/29/2021 Myrick, Tracy R.	Upload Plaintiff production and provide caseteam link to location.	\$195	0.3		\$58.50									
	3/29/2021 Myrick, Tracy R.	Download multiple defendant productions and provide caseteam links to location.	\$195	0.9		\$175.50									
	3/30/2021 Healey, Christopher J.	Review correspondence regarding case schedule.	\$895	0.1		\$89.50									
	3/30/2021 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding discovery status.	\$895	0.1		\$89.50									
	3/30/2021 Healey, Christopher J.	Outline proposal regarding case stipulation.	\$895	0.5		\$447.50									
	3/30/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding case schedule stipulation.	\$895	0.3		\$268.50									
	3/30/2021 Healey, Christopher J.	Analysis regarding case schedule.	\$895	0.3		\$268.50									
	3/30/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Sunrise's proposal.	\$895	0.2		\$179.00									
	3/30/2021 Healey, Christopher J.	Review Sunrise's proposed schedule and outline response.	\$895	0.5		\$447.50									
	3/30/2021 Healey, Christopher J.	Telephone conferences with Attorney Umpierre regarding case schedule issues.	\$895	0.5		\$447.50									
	3/30/2021 Healey, Christopher J.	Draft proposed response regarding case schedule.	\$895	0.2		\$179.00									
	3/30/2021 Myrick, Tracy R.	Update production log to reflect multiple defendant and plaintiff productions.	\$195	0.5		\$97.50									
	3/31/2021 Healey, Christopher J.	Correspondence regarding case status.	\$895	0.2		\$179.00									
	3/31/2021 Healey, Christopher J.	Outline approach regarding scheduling stipulation.	\$895	0.5		\$447.50									
	3/31/2021 Healey, Christopher J.	Telephone conference with Attorneys Umpierre and Johnson regarding case schedule.	\$895	0.7		\$626.50									
	3/31/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding expert discovery status.	\$895	0.3		\$268.50									
	3/31/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding case stipulation and negotiations.	\$895	0.3		\$268.50									
	3/31/2021 Healey, Christopher J.	Review court order regarding continued class hearing date and correspondence with team regarding same.	\$895	0.1		\$89.50									
	3/31/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding case schedule stipulation.	\$895	0.2		\$179.00									
	3/31/2021 Healey, Christopher J.	Revise correspondence to Attorney Gorman regarding case schedule.	\$895	0.6		\$537.00									
	3/31/2021 Healey, Christopher J.	Review and revise response on the case stipulation.	\$895	0.7		\$626.50									
	3/31/2021 Healey, Christopher J.	Telephone conferences with Attorney Umpierre regarding same.	\$895	0.5		\$447.50									
	3/31/2021 Healey, Christopher J.	Prepare correspondence regarding proposed call to Judge Guilford.	\$895	0.2		\$179.00									
	3/31/2021 Healey, Christopher J.	Prepare correspondence regarding potential discovery motion sequence.	\$895	0.3		\$268.50									
	3/31/2021 Myrick, Tracy R.	Link exhibits to deposition transcript of Ann Lacey and import into CaseNotebook database.	\$195	0.7		\$136.50									
	4/1/2021 Healey, Christopher J.	Telephone conference with Attorneys Umpierre and Johnson regarding stipulation negotiations.	\$895	0.6		\$537.00									
	4/1/2021 Healey, Christopher J.	Review and revise draft statement regarding proposed case schedule.	\$895	0.5		\$447.50									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	4/1/2021 Healey, Christopher J.	Telephone conference with Attorneys Umpierre and Johnson regarding case schedule.	\$895	0.5									
	4/1/2021 Healey, Christopher J.	Draft revisions to case schedule stipulation.	\$895	0.2									
	4/1/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery motions.	\$895	0.1									
	4/1/2021 Healey, Christopher J.	Review as-filed case stipulation and correspondence regarding same.	\$895	0.1									
	4/1/2021 Healey, Christopher J.	Review correspondence from Attorney Marks regarding assessment analysis.	\$895	0.1									
	4/2/2021 Healey, Christopher J.	Review correspondence from Attorney Marks regarding status of shortfall analysis.	\$895	0.1									
	4/5/2021 Healey, Christopher J.	Correspondence regarding discovery motions.	\$895	0.1									
	4/5/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$895	0.2									
	4/5/2021 Healey, Christopher J.	Outline revisions to discovery motions.	\$895	0.2									
	4/5/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$895	0.1									
	4/5/2021 Healey, Christopher J.	Office conference regarding discovery motions and filings.	\$895	0.1									
	4/5/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding case status.	\$895	0.2									
	4/5/2021 Healey, Christopher J.	Review and comment regarding joint statement.	\$895	0.1									
	4/5/2021 Healey, Christopher J.	Prepare correspondence to team regarding case schedule and motion briefing.	\$895	0.2									
	4/5/2021 Healey, Christopher J.	Review Gibson's insert to joint statement regarding discovery motion and follow-up correspondence regarding same.	\$895	0.1									
	4/5/2021 Healey, Christopher J.	Review report on SCOTUS argument in Ramirez standing case.	\$895	0.2									
	4/6/2021 Healey, Christopher J.	Review correspondence regarding discovery motions.	\$895	0.1									
	4/6/2021 Healey, Christopher J.	Review court order continuing case schedule.	\$895	0.2									
	4/7/2021 Healey, Christopher J.	Review Olean v. Bumble Bee decision regarding predominance.	\$895	0.7									
	4/7/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.5									
	4/7/2021 Healey, Christopher J.	Outline response argument regarding Olean decision.	\$895	0.1									
	4/7/2021 Healey, Christopher J.	Correspondence with Kennedy's office regarding revised case schedule.	\$895	0.1									
	4/8/2021 Healey, Christopher J.	Telephone conference with Patrick Kennedy regarding case status and expert analysis.	\$895	0.1									
	4/8/2021 Healey, Christopher J.	Review Sunrise's motion to strike declaration of Dale Schroyer.	\$895	0.1									
	4/12/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding motion to strike oppositions and Olean decision.	\$895	0.1									
	4/12/2021 Healey, Christopher J.	Telephone conference with Attorneys Umpierre and Johnson regarding discovery motions.	\$895	0.3									
	4/13/2021 Healey, Christopher J.	Review Defendants' motions to strike experts declarations.	\$895	0.5									
	4/13/2021 Healey, Christopher J.	Outline response to motions to strike.	\$895	0.1									
	4/13/2021 Healey, Christopher J.	Review draft meet and confer letter.	\$895	0.2									
	4/13/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$895	0.5									
	4/14/2021 Healey, Christopher J.	Review and revise letter regarding discovery motions.	\$895	1.7									
	4/14/2021 Healey, Christopher J.	Prepare correspondence to Attorney Johnson regarding same.	\$895	0.1									
	4/15/2021 Healey, Christopher J.	Telephone conference with Attorney Johnson regarding meet and confer letter regarding discovery motions.	\$895	0.2									
	4/15/2021 Healey, Christopher J.	Correspondence regarding discovery letter.	\$895	0.1									
	4/15/2021 Healey, Christopher J.	Revise meet and confer letter regarding discovery motions.	\$895	1.2									
	4/16/2021 Healey, Christopher J.	Prepare correspondence regarding case schedule.	\$895	0.2									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>			
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/16/2021 Healey, Christopher J.	Review and revise case schedule list.	\$895	0.1		\$89.50								
	4/16/2021 Healey, Christopher J.	Review Attorney Marks' report regarding shortfall analysis.	\$895	0.1		\$89.50								
	4/19/2021 Healey, Christopher J.	Prepare correspondence regarding shortfall analysis.	\$895	0.1		\$89.50								
	4/19/2021 Healey, Christopher J.	Outline settlement approach.	\$895	0.4		\$358.00								
	4/19/2021 Healey, Christopher J.	Review MacRae settlement.	\$895	0.3		\$268.50								
	4/20/2021 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding settlement approach.	\$895	0.5		\$447.50								
	4/20/2021 Healey, Christopher J.	Review court order regarding motion schedules.	\$895	0.1		\$89.50								
	4/20/2021 Healey, Christopher J.	Prepare correspondence to team regarding shortfall analysis.	\$895	0.1		\$89.50								
	4/21/2021 Healey, Christopher J.	Correspondence regarding case schedule.	\$895	0.1		\$89.50								
	4/21/2021 Myrick, Tracy R.	Upload various productions to FTP site for R. Bonner to import into Relativity.	\$195	0.3		\$58.50								
	4/22/2021 Healey, Christopher J.	Review case schedule.	\$895	0.2		\$179.00								
	4/22/2021 Healey, Christopher J.	Review subsequent history for Olean decision.	\$895	0.1		\$89.50								
	4/23/2021 Healey, Christopher J.	Review case calendar and prepare correspondence to team regarding same.	\$895	0.2		\$179.00								
	4/26/2021 Healey, Christopher J.	Review Olean decision and outline analysis regarding same.	\$895	1.5		\$1,342.50								
	4/27/2021 Healey, Christopher J.	Analysis regarding Olean decision and expert evidence.	\$895	0.6		\$537.00								
	4/27/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.4		\$358.00								
	4/27/2021 Healey, Christopher J.	Review Sunrise's correspondence regarding CLM inspection.	\$895	0.1		\$89.50								
	4/27/2021 Healey, Christopher J.	Correspondence regarding expert meeting.	\$895	0.1		\$89.50								
	4/27/2021 Healey, Christopher J.	Draft analysis regarding Olean decision.	\$895	0.7		\$626.50								
	4/27/2021 Healey, Christopher J.	Correspondence regarding investigator's expense and status.	\$895	0.1		\$89.50								
	4/28/2021 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding settlement approach.	\$895	0.2		\$179.00								
	4/28/2021 Healey, Christopher J.	Review defendants' response regarding discovery motions.	\$895	0.1		\$89.50								
	4/28/2021 Healey, Christopher J.	Correspondence regarding claim made research.	\$895	0.2		\$179.00								
	4/28/2021 Healey, Christopher J.	Review and respond to Attorney Marks' correspondence regarding billing history information.	\$895	0.1		\$89.50								
	4/29/2021 Healey, Christopher J.	Correspondence regarding CLM inspection.	\$895	0.1		\$89.50								
	4/29/2021 Healey, Christopher J.	Draft analysis memorandum regarding Olean decision.	\$895	1.6		\$1,432.00								
	4/29/2021 Healey, Christopher J.	Review research regarding Judge Staton's class settlement approvals.	\$895	0.5		\$447.50								
	4/29/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.5		\$447.50								
	4/29/2021 Valero, Carmen A.	Research Judge Staton's class action settlements including claims made provisions, for C. Healey.	\$360	0.3		\$108.00								
	4/30/2021 Healey, Christopher J.	Draft analysis regarding Olean decision.	\$895	1.3		\$1,163.50								
	4/30/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Olean decision, discovery and reply brief.	\$895	0.8		\$716.00								
	4/30/2021 Healey, Christopher J.	Prepare for team call.	\$895	0.1		\$89.50								
	4/30/2021 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding settlement concepts.	\$895	0.1		\$89.50								
	4/30/2021 Healey, Christopher J.	Follow-up correspondence regarding Olean analysis.	\$895	0.3		\$268.50								
	4/30/2021 Myrick, Tracy R.	Update production log and deposition log.	\$195	0.5		\$97.50								
	5/3/2021 Healey, Christopher J.	Attend GoTo meeting with Attyn Marks regarding expert shortfall analysis.	\$895	1.5		\$1,342.50								
	5/3/2021 Healey, Christopher J.	Follow-up correspondence regarding record support for analysis.	\$895	0.2		\$179.00								
	5/3/2021 Healey, Christopher J.	Review order regarding Olean decision.	\$895	0.1		\$89.50								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	5/4/2021 Healey, Christopher J.	Review draft shortfall analysis spreadsheet.	\$895	0.2	\$179.00								
	5/4/2021 Healey, Christopher J.	Review correspondence regarding CLM inspection.	\$895	0.1	\$89.50								
	5/4/2021 Healey, Christopher J.	Review documents in preparation for CLM inspection.	\$895	1	\$895.00								
	5/4/2021 Healey, Christopher J.	Prepare correspondence regarding CLM inspection.	\$895	0.5	\$447.50								
	5/4/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding to-do items.	\$895	0.1	\$89.50								
	5/4/2021 Healey, Christopher J.	Outline settlement approach position.	\$895	0.1	\$89.50								
	5/5/2021 Healey, Christopher J.	Attend CLM inspection.	\$895	1.4	\$1,253.00								
	5/5/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.3	\$268.50								
	5/5/2021 Healey, Christopher J.	Prepare correspondence regarding discovery follow-up items.	\$895	0.2	\$179.00								
	5/6/2021 Healey, Christopher J.	Prepare for team call regarding discovery issues.	\$895	0.1	\$89.50								
	5/6/2021 Healey, Christopher J.	Team call regarding CLM inspection and discovery motions.	\$895	1.2	\$1,074.00			1.2	1,074.00				
	5/7/2021 Healey, Christopher J.	Review summary of CLM inspection.	\$895	0.2	\$179.00								
	5/7/2021 Healey, Christopher J.	Prepare correspondence to team regarding follow-up points.	\$895	0.7	\$626.50								
	5/7/2021 Healey, Christopher J.	Prepare correspondence regarding Sunrise time estimates and shortfall.	\$895	0.3	\$268.50								
	5/10/2021 Healey, Christopher J.	Review correspondence regarding settlement status.	\$895	0.1	\$89.50								
	5/10/2021 Healey, Christopher J.	Draft proposed response to Sunrise's settlement position.	\$895	1	\$895.00								
	5/10/2021 Healey, Christopher J.	Review Attorney Marks' changes to CLM inspection memorandum.	\$895	0.2	\$179.00								
	5/10/2021 Healey, Christopher J.	Respond to JimThornton's email for additional discovery.	\$895	0.2	\$179.00								
	5/11/2021 Healey, Christopher J.	Correspondence regarding settlement response.	\$895	0.1	\$89.50								
	5/11/2021 Healey, Christopher J.	Correspondence regarding shortfall analysis.	\$895	0.1	\$89.50								
	5/12/2021 Healey, Christopher J.	Review Attorney Marks' list regarding evidence support for shortfall analysis.	\$895	0.3	\$268.50								
	5/12/2021 Healey, Christopher J.	Correspondence regarding case calendar.	\$895	0.1	\$89.50								
	5/12/2021 Healey, Christopher J.	Correspondence regarding discovery request.	\$895	0.1	\$89.50								
	5/13/2021 Healey, Christopher J.	Revise settlement response statement.	\$895	0.4	\$358.00								
	5/13/2021 Healey, Christopher J.	Prepare correspondence to Attorneys Stebner and Wallace regarding same.	\$895	0.1	\$89.50								
	5/13/2021 Healey, Christopher J.	Prepare correspondence to Mediator Kaplan regarding settlement.	\$895	0.1	\$89.50								
	5/13/2021 Healey, Christopher J.	Correspondence regarding shortfall evidence support.	\$895	0.1	\$89.50								
	5/13/2021 Healey, Christopher J.	Correspondence from Mediator Kaplan regarding settlement offer.	\$895	0.1	\$89.50								
	5/13/2021 Healey, Christopher J.	Response to Mediator Kaplan.	\$895	0.1	\$89.50								
	5/13/2021 Healey, Christopher J.	Revise settlement position letter.	\$895	0.1	\$89.50								
	5/13/2021 Healey, Christopher J.	Follow-up correspondence regarding same.	\$895	0.1	\$89.50								
	5/14/2021 Healey, Christopher J.	Correspondence with Mediator Kaplan regarding settlement position.	\$895	0.1	\$89.50								
	5/14/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding support for shortfall analysis.	\$895	0.8	\$716.00								
	5/20/2021 Healey, Christopher J.	Review Attorney Umpierre's summary of proof supporting shortfall analysis.	\$895	0.2	\$179.00								
	5/20/2021 Healey, Christopher J.	Correspondence with Tracy Myrick regarding same.	\$895	0.1	\$89.50								
	5/20/2021 Healey, Christopher J.	Follow-up correspondence with Attorney Umpierre regarding same.	\$895	0.1	\$89.50								
	5/21/2021 Myrick, Tracy R.	Download defendant document production and provide caseteam link to location.	\$195	0.3	\$58.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>			
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	5/21/2021 Myrick, Tracy R.	Update production log regarding same.	\$195	0.2		\$39.00								
	5/21/2021 Myrick, Tracy R.	Work on running various searches across all deposition transcripts in support of proof to support DES testing and export reports from CaseNotebook database.	\$195	2		\$390.00								
	5/24/2021 Myrick, Tracy R.	Provide search reports from CaseNotebook database to Opposing Counsel B. Umpierre via email.	\$195	0.1		\$19.50								
	5/25/2021 Healey, Christopher J.	Prepare correspondence regarding joint statement regarding ADR status.	\$895	0.1		\$89.50								
	5/25/2021 Healey, Christopher J.	Prepare correspondence to team regarding status call and proposed agenda.	\$895	0.3		\$268.50								
	5/28/2021 Healey, Christopher J.	Prepare correspondence to Mediator Kaplan regarding mediation status.	\$895	0.1		\$89.50								
	5/28/2021 Healey, Christopher J.	Follow-up correspondence with Mediator Kaplan regarding same.	\$895	0.2		\$179.00								
	6/1/2021 Healey, Christopher J.	Correspondence regarding case status.	\$895	0.1		\$89.50								
	6/1/2021 Healey, Christopher J.	Draft updated status report regarding ADR.	\$895	0.1		\$89.50								
	6/1/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.1		\$89.50								
	6/1/2021 Healey, Christopher J.	Follow-up correspondence regarding same.	\$895	0.1		\$89.50								
	6/2/2021 Healey, Christopher J.	Team call regarding status, discovery and settlement.	\$895	1.2		\$1,074.00			1.2	1,074.00				
	6/2/2021 Healey, Christopher J.	Follow-up correspondence regarding same.	\$895	0.2		\$179.00								
	6/2/2021 Healey, Christopher J.	Review correspondence regarding ADR statement.	\$895	0.1		\$89.50								
	6/8/2021 Healey, Christopher J.	Prepare correspondence regarding expert invoices.	\$895	0.2		\$179.00								
	6/9/2021 Healey, Christopher J.	Correspondence regarding expert costs.	\$895	0.1		\$89.50								
	6/9/2021 Healey, Christopher J.	Follow-up correspondence regarding costs.	\$895	0.1		\$89.50								
	6/9/2021 Healey, Christopher J.	Prepare correspondence regarding to-do items.	\$895	0.2		\$179.00								
	6/9/2021 Healey, Christopher J.	Review Attorney Marks' email regarding census discrepancies for sample data.	\$895	0.1		\$89.50								
	6/10/2021 Healey, Christopher J.	Review and comment regarding discovery letter to Judge Guilford.	\$895	0.5		\$447.50								
	6/10/2021 Healey, Christopher J.	Review and respond to correspondence regarding missing assessments/census data discrepancies.	\$895	0.2		\$179.00								
	6/11/2021 Healey, Christopher J.	Telephone conference with Attorney Marks and Jim Thornton regarding ProModel analysis.	\$895	1		\$895.00								
	6/11/2021 Healey, Christopher J.	Follow-up correspondence regarding extrapolation data issues.	\$895	0.2		\$179.00								
	6/11/2021 Healey, Christopher J.	Review and comment on discovery letter.	\$895	0.5		\$447.50								
	6/11/2021 Healey, Christopher J.	Revise discovery letter.	\$895	0.2		\$179.00								
	6/14/2021 Healey, Christopher J.	Review Olean progeny and analysis regarding same.	\$895	1		\$895.00								
	6/14/2021 Healey, Christopher J.	Prepare correspondence to team.	\$895	0.5		\$447.50								
	6/14/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding discovery meet and confer.	\$895	0.1		\$89.50								
	6/14/2021 Healey, Christopher J.	Follow-up correspondence regarding same.	\$895	0.1		\$89.50								
	6/15/2021 Healey, Christopher J.	Review Defendants' position regarding discovery conference.	\$895	0.1		\$89.50								
	6/15/2021 Healey, Christopher J.	Correspondence with team regarding same.	\$895	0.2		\$179.00								
	6/15/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding proposed response.	\$895	0.1		\$89.50								
	6/15/2021 Healey, Christopher J.	Follow-up correspondence regarding same.	\$895	0.1		\$89.50								
	6/16/2021 Healey, Christopher J.	Correspondence regarding discovery conference.	\$895	0.1		\$89.50								
	6/16/2021 Healey, Christopher J.	Correspondence regarding outstanding expert invoices.	\$895	0.9		\$805.50								
	6/16/2021 Healey, Christopher J.	Review correspondence regarding Sunrise conference call.	\$895	0.1		\$89.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	6/17/2021 Healey, Christopher J.	Telephone conference with Attorney Yarnall regarding witness declaration and Olean analysis.	\$895	0.2		\$179.00									
	6/17/2021 Healey, Christopher J.	Follow-up correspondence regarding same.	\$895	0.1		\$89.50									
	6/21/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery conference.	\$895	0.2		\$179.00									
	6/21/2021 Healey, Christopher J.	Correspondence regarding discovery conference.	\$895	0.1		\$89.50									
	6/21/2021 Healey, Christopher J.	Prepare correspondence regarding expert invoices.	\$895	0.2		\$179.00									
	6/24/2021 Healey, Christopher J.	Review Judge Guilford's order regarding discovery conference.	\$895	0.1		\$89.50									
	6/24/2021 Healey, Christopher J.	Prepare correspondence regarding same.	\$895	0.1		\$89.50									
	6/25/2021 Healey, Christopher J.	Prepare correspondence regarding class opposition brief.	\$895	0.1		\$89.50									
	6/25/2021 Healey, Christopher J.	Review Sunrise's updated disclosure and prepare correspondence to team regarding same.	\$895	0.2		\$179.00									
	6/25/2021 Healey, Christopher J.	Prepare correspondence to team regarding updated witness disclosures.	\$895	0.2		\$179.00									
	6/25/2021 Healey, Christopher J.	Review Defendants' opposition to amended class motion.	\$895	0.2		\$179.00									
	6/26/2021 Healey, Christopher J.	Outline reply arguments on class motion.	\$895	0.2		\$179.00									
	6/26/2021 Healey, Christopher J.	Review defendants' class certification filing.	\$895	0.1		\$89.50									
	6/27/2021 Healey, Christopher J.	Prepare correspondence to team regarding class reply and related issues.	\$895	0.1		\$89.50									
	6/27/2021 Healey, Christopher J.	Review defendants' arguments regarding class opposition and outline potential responses.	\$895	1.5		\$1,342.50									
	6/27/2021 Healey, Christopher J.	Correspondence regarding team call concerning class reply.	\$895	0.2		\$179.00									
	6/28/2021 Healey, Christopher J.	Review In Re Volkswagen decision regarding reliance presumption.	\$895	0.2		\$179.00									
	6/28/2021 Healey, Christopher J.	Outline reply to Sunrise's opposition to amended class motion.	\$895	3.6		\$3,222.00									
	6/29/2021 Healey, Christopher J.	Prepare correspondence to team regarding "todo" list for class reply.	\$895	0.3		\$268.50									
	6/29/2021 Healey, Christopher J.	Telephone conference with team regarding reply brief and assignments.	\$895	1.2		\$1,074.00									
	6/29/2021 Healey, Christopher J.	Correspondence with Attorney Marks regarding Schroyer reply declaration.	\$895	0.2		\$179.00				1.2	1,074.00				
	6/29/2021 Healey, Christopher J.	Correspondence with Attorney Marks regarding reply brief.	\$895	0.1		\$89.50									
	6/30/2021 Healey, Christopher J.	Follow-up correspondence to Attorney Umpierre regarding class reply papers.	\$895	0.1		\$89.50									
	6/30/2021 Healey, Christopher J.	Analyze opposition arguments regarding Flores.	\$895	1		\$895.00									
	6/30/2021 Healey, Christopher J.	Outline reply brief on class motion.	\$895	2.7		\$2,416.50									
	6/30/2021 Healey, Christopher J.	Office conference regarding record review.	\$895	0.2		\$179.00									
	7/1/2021 Healey, Christopher J.	Outline arguments for class reply brief.	\$895	0.2		\$179.00									
	7/1/2021 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding expert declarations.	\$895	0.1		\$89.50									
	7/1/2021 Healey, Christopher J.	Correspondence with expert Kennedy's office regarding reply arguments.	\$895	0.1		\$89.50									
	7/1/2021 Healey, Christopher J.	Research regarding Mazza standing issue.	\$895	0.1		\$89.50									
	7/1/2021 Healey, Christopher J.	Review correspondence regarding changes to Defendants' opposition appendix.	\$895	0.1		\$89.50									
	7/1/2021 Healey, Christopher J.	Outline reply brief and draft inserts to argument.	\$895	1		\$895.00									
	7/1/2021 Healey, Christopher J.	Correspondence with Attorney Marks regarding Schroyer reply declaration.	\$895	0.3		\$268.50									
	7/2/2021 Healey, Christopher J.	Draft reply brief.	\$895	1.8		\$1,611.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/3/2021 Healey, Christopher J.	Draft class reply brief.	\$895	4.9		\$4,385.50									
	7/4/2021 Healey, Christopher J.	Draft class reply brief.	\$895	5.2		\$4,654.00			1	895.00					
	7/5/2021 Healey, Christopher J.	Draft class reply brief.	\$895	5.9		\$5,280.50			1	895.00					
	7/6/2021 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding Schroyer reply declaration.	\$895	0.5		\$447.50									
	7/6/2021 Healey, Christopher J.	Draft class reply brief.	\$895	3.5		\$3,132.50									
	7/6/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding preparation for discovery conference and class reply.	\$895	0.3		\$268.50									
	7/7/2021 Healey, Christopher J.	Telephone conference with Pat Kennedy regarding Defendants' opposition and Ward arguments.	\$895	0.5		\$447.50									
	7/7/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding reply brief.	\$895	0.2		\$179.00									
	7/7/2021 Healey, Christopher J.	Review Attorney Umpierre's correspondence regarding discovery hearing.	\$895	0.1		\$89.50									
	7/7/2021 Healey, Christopher J.	Review Attorney Umpierre's correspondence regarding Sunrise understaffing admissions.	\$895	0.1		\$89.50									
	7/7/2021 Healey, Christopher J.	Prepare for discovery hearing.	\$895	0.2		\$179.00									
	7/8/2021 Healey, Christopher J.	Correspondence regarding class reply brief.	\$895	0.1		\$89.50									
	7/8/2021 Healey, Christopher J.	Review and respond to Attorney Marks' email regarding Schroyer declaration.	\$895	0.1		\$89.50									
	7/8/2021 Healey, Christopher J.	Prepare correspondence regarding response to Sunrise's objections to Yarnall/Ganz declarations.	\$895	0.1		\$89.50									
	7/8/2021 Healey, Christopher J.	Prepare for discovery hearing.	\$895	2.7		\$2,416.50									
	7/8/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding shortfall analysis.	\$895	0.3		\$268.50									
	7/9/2021 Healey, Christopher J.	Prepare for discovery hearing.	\$895	0.5		\$447.50									
	7/9/2021 Healey, Christopher J.	Attend discovery hearing.	\$895	0.6		\$537.00									
	7/9/2021 Healey, Christopher J.	Status report to team regarding hearing.	\$895	0.2		\$179.00									
	7/12/2021 Healey, Christopher J.	Review and comment regarding proposed objections to Sunrise evidence.	\$895	0.4		\$358.00									
	7/12/2021 Healey, Christopher J.	Prepare correspondence regarding reply brief.	\$895	0.1		\$89.50									
	7/12/2021 Healey, Christopher J.	Correspondence with Attorney Wallace regarding reply brief.	\$895	0.1		\$89.50									
	7/12/2021 Healey, Christopher J.	Outline inserts to reply brief.	\$895	2.6		\$2,327.00									
	7/12/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Schroyer analysis.	\$895	0.2		\$179.00									
	7/12/2021 Healey, Christopher J.	Follow-up correspondence regarding Attorney Marks' questions.	\$895	0.1		\$89.50									
	7/12/2021 Healey, Christopher J.	Review and comment on Umpierre declaration regarding reply.	\$895	0.2		\$179.00									
	7/13/2021 Healey, Christopher J.	Review and comment on Umpierre declaration.	\$895	1.2		\$1,074.00									
	7/13/2021 Healey, Christopher J.	Review Attorney Wallace's revisions to reply brief.	\$895	0.2		\$179.00									
	7/13/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding reply briefing.	\$895	0.2		\$179.00									
	7/13/2021 Healey, Christopher J.	Revise class reply brief.	\$895	4.4		\$3,938.00			1	895.00					
	7/14/2021 Healey, Christopher J.	Revise class reply brief.	\$895	1		\$895.00									
	7/14/2021 Healey, Christopher J.	Outline inserts to reply brief.	\$895	0.2		\$179.00									
	7/14/2021 Healey, Christopher J.	Review and comment regarding Schroyer reply declaration.	\$895	1.3		\$1,163.50									
	7/14/2021 Healey, Christopher J.	Further revisions to reply brief.	\$895	5.1		\$4,564.50			2	1,790.00					
	7/14/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Schroyer declaration.	\$895	0.2		\$179.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/14/2021 Healey, Christopher J.	Review and comment regarding evidentiary objections.	\$895	0.5		\$447.50									
	7/14/2021 Healey, Christopher J.	Analysis regarding ED staffing hours issue.	\$895	0.5		\$447.50									
	7/14/2021 Healey, Christopher J.	Office conference regarding exhibit index.	\$895	0.2		\$179.00									
	7/14/2021 Healey, Christopher J.	Outline further revisions to class reply brief.	\$895	0.2		\$179.00									
	7/15/2021 Healey, Christopher J.	Revise class reply brief.	\$895	3		\$2,685.00		1	895.00						
	7/15/2021 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding Schroyer reply declaration.	\$895	0.1		\$89.50									
	7/15/2021 Healey, Christopher J.	Revise objections to defendants evidence.	\$895	1.5		\$1,342.50									
	7/15/2021 Healey, Christopher J.	Correspondence with Attorney Marks regarding Schroyer reply declaration.	\$895	0.1		\$89.50									
	7/15/2021 Healey, Christopher J.	Review Attorney Umpierre's changes to reply and prepare correspondence regarding discovery timing.	\$895	0.2		\$179.00									
	7/15/2021 Healey, Christopher J.	Revise Umpierre declaration.	\$895	1		\$895.00									
	7/15/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding filing of class reply.	\$895	0.2		\$179.00									
	7/15/2021 Healey, Christopher J.	Further revisions to reply brief.	\$895	0.5		\$447.50									
	7/15/2021 Healey, Christopher J.	Office conference regarding class reply filing.	\$895	0.2		\$179.00									
	7/15/2021 Healey, Christopher J.	Telephone conferences with Attorney Marks regarding reply arguments.	\$895	0.4		\$358.00									
	7/15/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding new Sunrise production.	\$895	0.1		\$89.50									
	7/15/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding reply brief.	\$895	0.1		\$89.50									
	7/15/2021 Healey, Christopher J.	Revise reply brief to better DES summary.	\$895	1.4		\$1,253.00									
	7/15/2021 Healey, Christopher J.	Outline further inserts.	\$895	0.1		\$89.50									
	7/15/2021 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding Lacey deposition.	\$895	0.2		\$179.00									
	7/15/2021 Howard, Kathryn M.	Email exchanges regarding cite checking Plaintiffs' Reply to Amended Motion for Class Certification.	\$325	0.1		\$32.50									
	7/15/2021 Howard, Kathryn M.	Analysis of Reply and check all citations including revisions thereto and review case law.	\$325	4.3		\$1,397.50									
	7/15/2021 Howard, Kathryn M.	Finalize Reply.	\$325	0.1		\$32.50									
	7/15/2021 Howard, Kathryn M.	Prepare email to C. Healey regarding same.	\$325	0.1		\$32.50									
	7/15/2021 Myrick, Tracy R.	Download defendant production and provide caseteam link to location.	\$195	0.2		\$39.00									
	7/16/2021 Healey, Christopher J.	Revise class reply brief.	\$895	0.5		\$447.50									
	7/16/2021 Healey, Christopher J.	Correspondence with team regarding same.	\$895	0.2		\$179.00									
	7/16/2021 Healey, Christopher J.	Correspondence with Attorney Marks regarding Schroyer reply declaration.	\$895	0.2		\$179.00									
	7/16/2021 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding timing of Sunrise data production.	\$895	0.2		\$179.00									
	7/16/2021 Healey, Christopher J.	Further correspondence regarding reply brief and supporting materials.	\$895	0.3		\$268.50									
	7/16/2021 Healey, Christopher J.	Further revisions to reply brief.	\$895	1.8		\$1,611.00									
	7/16/2021 Healey, Christopher J.	Correspondence regarding same.	\$895	0.2		\$179.00									
	7/16/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding revisions.	\$895	0.2		\$179.00									
	7/16/2021 Healey, Christopher J.	Telephone conference with team regarding case filing.	\$895	0.1		\$89.50									
	7/16/2021 Howard, Kathryn M.	Analysis of email from L. Valdez regarding brief.	\$325	0.1		\$32.50				0.1	89.50				
	7/16/2021 Howard, Kathryn M.	Review brief regarding citations.	\$325	0.4		\$130.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>			
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/16/2021 Howard, Kathryn M.	Review followup from L. Valdez regarding same.	\$325	0.1		\$32.50								
	7/19/2021 Healey, Christopher J.	Prepare correspondence regarding reply filing and Schroyer documents.	\$895	0.1		\$89.50								
	7/19/2021 Healey, Christopher J.	Prepare correspondence regarding witness disclosure statement.	\$895	0.1		\$89.50								
	7/20/2021 Healey, Christopher J.	Outline opposition to Schroyer motion to strike.	\$895	0.5		\$447.50								
	7/20/2021 Healey, Christopher J.	Prepare correspondence regarding proposed order regarding amended motion for class certification.	\$895	0.1		\$89.50								
	7/20/2021 Healey, Christopher J.	Continue outline of opposition to Schroyer motion to strike.	\$895	0.5		\$447.50								
	7/21/2021 Healey, Christopher J.	Correspondence regarding Schroyer production.	\$895	0.1		\$89.50								
	7/21/2021 Healey, Christopher J.	Draft opposition to Schroyer motion to strike.	\$895	2.3		\$2,058.50								
	7/21/2021 Myrick, Tracy R.	Update production log regarding defendant production SUN047.	\$195	0.1		\$19.50								
	7/22/2021 Healey, Christopher J.	Revise opposition to Schroyer motion to strike.	\$895	0.8		\$716.00								
	7/22/2021 Healey, Christopher J.	Prepare correspondence regarding Schroyer expert production.	\$895	0.1		\$89.50								
	7/23/2021 Healey, Christopher J.	Revise opposition to Schroyer motion to strike.	\$895	1.1		\$984.50								
	7/23/2021 Healey, Christopher J.	Further revisions to opposition to Schroyer motion to strike.	\$895	1.5		\$1,342.50								
	7/23/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.1		\$89.50								
	7/23/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding discovery status.	\$895	0.1		\$89.50								
	7/26/2021 Healey, Christopher J.	Prepare correspondence to team regarding updated witness disclosure.	\$895	0.2		\$179.00								
	7/27/2021 Healey, Christopher J.	Revise autocite results on Schroyer motion to strike opposition and revise brief.	\$895	0.8		\$716.00								
	7/27/2021 Howard, Kathryn M.	Email exchanges regarding review and cite checking of Plaintiff's Opposition to Defendants Renewed Motion to Strike.	\$325	0.1		\$32.50								
	7/27/2021 Howard, Kathryn M.	Review Opposition to Motion to Strike and checked citations, revise same and review cases to determine if law was still good.	\$325	3.8		\$1,235.00								
	7/27/2021 Howard, Kathryn M.	Finalize opposition and prepare email regarding same.	\$325	0.1		\$32.50								
	7/27/2021 Howard, Kathryn M.	Followup emails regarding same.	\$325	0.1		\$32.50								
	7/28/2021 Healey, Christopher J.	Review changes to Schroyer motion to strike opposition.	\$895	0.2		\$179.00								
	7/28/2021 Healey, Christopher J.	Correspondence from Attorney Marks regarding Schroyer opposition.	\$895	0.1		\$89.50								
	7/28/2021 Healey, Christopher J.	Revise Schroyer motion to strike opposition.	\$895	0.5		\$447.50								
	7/28/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery issues and opposition filing.	\$895	0.2		\$179.00								
	7/28/2021 Healey, Christopher J.	Correspondence regarding opposition filing.	\$895	0.1		\$89.50								
	7/28/2021 Healey, Christopher J.	Outline opposition to Flores motion to strike opposition.	\$895	0.8		\$716.00								
	7/28/2021 Healey, Christopher J.	Prepare correspondence regarding Sunrise's request for MedModel files.	\$895	0.1		\$89.50								
	7/28/2021 Healey, Christopher J.	Prepare correspondence regarding Schroyer motion to strike opposition.	\$895	0.1		\$89.50								
	7/28/2021 Healey, Christopher J.	Review Attorney Yarnall's email regarding witness disclosure update.	\$895	0.1		\$89.50								
	7/28/2021 Healey, Christopher J.	Correspondence with Attorney Marks regarding production file issue.	\$895	0.2		\$179.00								
	7/29/2021 Healey, Christopher J.	Revise Plaintiffs' supplemental disclosures.	\$895	0.3		\$268.50								
	7/29/2021 Healey, Christopher J.	Outline Flores motion to strike opposition.	\$895	1.3		\$1,163.50								
	7/29/2021 Healey, Christopher J.	Draft opposition to Flores motion to strike.	\$895	1.5		\$1,342.50								
	7/30/2021 Healey, Christopher J.	Review Attorney Gorman's letter regarding Dale Schroyer.	\$895	0.1		\$89.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/30/2021 Healey, Christopher J.	Prepare correspondence to team regarding discovery issues.	\$895	0.1		\$89.50								
	7/30/2021 Healey, Christopher J.	Outline response to Attorney Gorman's letter.	\$895	0.1		\$89.50								
	7/31/2021 Healey, Christopher J.	Draft response to Attorney Gorman's discovery letters.	\$895	1.1		\$984.50								
	8/1/2021 Healey, Christopher J.	Draft response to Attorney Gorman's letter.	\$895	1.4		\$1,253.00								
	8/1/2021 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding same.	\$895	0.1		\$89.50								
	8/1/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$895	0.2		\$179.00								
	8/1/2021 Healey, Christopher J.	Revise draft response to Attorney Gorman.	\$895	0.3		\$268.50								
	8/8/2021 Healey, Christopher J.	Review order regarding Olean and prepare correspondence regarding same.	\$895	0.1		\$89.50								
	8/9/2021 Healey, Christopher J.	Draft Notice of Supplemental Authority regarding Olean.	\$895	0.2		\$179.00								
	8/9/2021 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$895	0.1		\$89.50								
	8/9/2021 Healey, Christopher J.	Revise opposition to Flores motion to strike.	\$895	1		\$895.00								
	8/10/2021 Healey, Christopher J.	Revise opposition to Flores motion to strike.	\$895	2.5		\$2,237.50								
	8/11/2021 Healey, Christopher J.	Revise opposition to Flores motion to strike.	\$895	3.5		\$3,132.50	1	895.00						
	8/11/2021 Healey, Christopher J.	Prepare correspondence regarding confidentiality issues.	\$895	0.3		\$268.50								
	8/11/2021 Healey, Christopher J.	Outline opposition to Kennedy motion to strike.	\$895	0.2		\$179.00								
	8/12/2021 Healey, Christopher J.	Draft opposition to Kennedy motion to strike.	\$895	4.2		\$3,759.00	1	895.00						
	8/13/2021 Healey, Christopher J.	Revise opposition to Kennedy motion to strike opposition.	\$895	1.5		\$1,342.50								
	8/13/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.1		\$89.50								
	8/16/2021 Healey, Christopher J.	Review Sunrise's updated production.	\$895	0.1		\$89.50								
	8/16/2021 Healey, Christopher J.	Review court order regarding class certification motion papers.	\$895	0.1		\$89.50								
	8/16/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding updated Sunrise production.	\$895	0.1		\$89.50								
	8/16/2021 Healey, Christopher J.	Revise opposition to Kennedy motion to strike.	\$895	0.2		\$179.00								
	8/16/2021 Healey, Christopher J.	Research regarding Pulaski applicability to CLRA claims.	\$895	0.1		\$89.50								
	8/16/2021 Healey, Christopher J.	Office conference regarding refiling of class motion.	\$895	0.1		\$89.50								
	8/16/2021 Healey, Christopher J.	Draft proposed order regarding amended class certification motion.	\$895	2.3		\$2,058.50	1	895.00						
	8/16/2021 Healey, Christopher J.	Further office conference regarding court filing.	\$895	0.2		\$179.00								
	8/16/2021 Myrick, Tracy R.	Download multiple defendant productions and provide caseteam links to location.	\$195	0.7		\$136.50								
	8/16/2021 Valero, Carmen A.	Research 9th Circuit cases citing to Pulaski outside the context of UCL claims, for C. Healey.	\$360	1		\$360.00								
	8/17/2021 Healey, Christopher J.	Correspondence with team regarding court filing.	\$895	0.2		\$179.00								
	8/17/2021 Healey, Christopher J.	Review research regarding post-Pulaski decisions.	\$895	0.5		\$447.50								
	8/17/2021 Healey, Christopher J.	Review notice of refiling.	\$895	0.1		\$89.50								
	8/17/2021 Healey, Christopher J.	Revise Kennedy motion to strike opposition.	\$895	1		\$895.00								
	8/17/2021 Healey, Christopher J.	Research regarding Rule 60 relief from non-compliance with Court order.	\$895	1		\$895.00								
	8/18/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Flores motion to strike opposition.	\$895	0.1		\$89.50								
	8/18/2021 Healey, Christopher J.	Correspondence regarding Musoke declaration.	\$895	0.1		\$89.50								
	8/18/2021 Healey, Christopher J.	Correspondence regarding proposed class certification order.	\$895	0.1		\$89.50								
	8/18/2021 Howard, Kathryn M.	Analysis of Plaintiffs' Opposition to Defendants Renewed Motion to Strike Declaration of Patrick Kennedy, check all citations and revise Opposition.	\$325	2.9		\$942.50								
	8/18/2021 Howard, Kathryn M.	Finalize opposition and prepare email to C. Healey.	\$325	0.2		\$65.00								
	8/18/2021 Myrick, Tracy R.	Update production log to reflect recently received defendant productions.	\$195	0.1		\$19.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	8/18/2021 Myrick, Tracy R.	Upload defendant productions SUN048 and SUN049 to ftp for R. Bonner.	\$195	0.2		\$39.00								
	8/18/2021 Myrick, Tracy R.	Send email regarding same.	\$195	0.1		\$19.50								
	8/19/2021 Healey, Christopher J.	Review Attorney Wallace's correspondence regarding class certification order.	\$895	0.1		\$89.50								
	8/19/2021 Healey, Christopher J.	Review cite check results regarding Kennedy motion to strike opposition.	\$895	0.1		\$89.50								
	8/19/2021 Healey, Christopher J.	Follow-up correspondence regarding opposition briefs.	\$895	0.1		\$89.50								
	8/19/2021 Healey, Christopher J.	Review changes to Flores motion to strike opposition.	\$895	0.2		\$179.00								
	8/19/2021 Healey, Christopher J.	Correspondence regarding same.	\$895	0.1		\$89.50								
	8/19/2021 Healey, Christopher J.	Revise Flores motion to strike opposition.	\$895	2		\$1,790.00								
	8/19/2021 Healey, Christopher J.	Revise Kennedy motion to strike opposition.	\$895	0.5		\$447.50								
	8/19/2021 Healey, Christopher J.	Follow-up correspondence with team regarding opposition briefs. Analysis of Plaintiffs' Opposition to Defendants Renewed Motion to Strike Declaration of Cristina Flores, check all citations and revise	\$895	0.1		\$89.50								
	8/19/2021 Howard, Kathryn M.	Opposition.	\$325	2		\$650.00								
	8/19/2021 Howard, Kathryn M.	Finalize opposition and prepare email to C. Healey.	\$325	0.2		\$65.00								
	8/19/2021 Howard, Kathryn M.	Review email from L. Valdez regarding the Torres cite.	\$325	0.1		\$32.50								
	8/19/2021 Howard, Kathryn M.	Further analysis of Torres citation.	\$325	0.2		\$65.00								
	8/19/2021 Howard, Kathryn M.	Prepare email to L. Valdez regarding same.	\$325	0.1		\$32.50								
	8/20/2021 Healey, Christopher J.	Revise Flores motion to strike opposition.	\$895	0.2		\$179.00								
	8/20/2021 Healey, Christopher J.	Correspondence regarding sur-reply brief.	\$895	0.1		\$89.50								
	8/20/2021 Healey, Christopher J.	Revise proposed order regarding amended class certification motion.	\$895	2		\$1,790.00								
	8/20/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding response to sur-reply.	\$895	0.1		\$89.50								
	8/21/2021 Healey, Christopher J.	Outline response regarding sur-reply.	\$895	0.5		\$447.50								
	8/21/2021 Healey, Christopher J.	Review Sunrise's response to Evidence.	\$895	0.2		\$179.00								
	8/21/2021 Healey, Christopher J.	Review Sunrise's sur-reply.	\$895	0.7		\$626.50								
	8/21/2021 Healey, Christopher J.	Review Sunrise's motion to strike Schroyer.	\$895	0.3		\$268.50								
	8/21/2021 Healey, Christopher J.	Correspondence with team regarding sur-reply issues.	\$895	0.2		\$179.00								
	8/21/2021 Healey, Christopher J.	Prepare correspondence to team regarding proposal regarding sur-reply.	\$895	0.5		\$447.50								
	8/22/2021 Healey, Christopher J.	Outline response to sur-reply.	\$895	0.3		\$268.50								
	8/22/2021 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$895	0.5		\$447.50								
	8/22/2021 Healey, Christopher J.	Research regarding Transumier cases and draft response insert regarding same.	\$895	1.4		\$1,253.00								
	8/23/2021 Healey, Christopher J.	Correspondence regarding sur-reply.	\$895	0.1		\$89.50								
	8/23/2021 Healey, Christopher J.	Follow-up correspondence regarding same; draft notice of errata regarding Schroyer opposition.	\$895	0.3		\$268.50								
	8/23/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding sur-reply response.	\$895	0.2		\$179.00								
	8/23/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding sur-reply response.	\$895	0.2		\$179.00								
	8/23/2021 Healey, Christopher J.	Review and revise response to sur-reply leave request.	\$895	0.5		\$447.50								
	8/23/2021 Healey, Christopher J.	Correspondence regarding preparing amended order.	\$895	0.2		\$179.00								
	8/23/2021 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding settlement status.	\$895	0.3		\$268.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	8/23/2021 Healey, Christopher J.	Review errata notice.	\$895	0.1		\$89.50									
	8/23/2021 Healey, Christopher J.	Follow-up correspondence regarding sur-reply response.	\$895	0.2		\$179.00									
	8/23/2021 Healey, Christopher J.	Prepare for class certification hearing.	\$895	1		\$895.00									
	8/23/2021 Healey, Christopher J.	Review propose class certification order and prepare correspondence regarding same.	\$895	0.2		\$179.00									
	8/23/2021 Howard, Kathryn M.	Analysis of Amended Motion for Class Certification including cite checking and revising same.	\$325	1.8		\$585.00									
	8/23/2021 Howard, Kathryn M.	Finalize Order.	\$325	0.1		\$32.50									
	8/23/2021 Howard, Kathryn M.	Prepare email to C. Healey regarding same.	\$325	0.1		\$32.50									
	8/24/2021 Healey, Christopher J.	Prepare for class certification hearing.	\$895	5		\$4,475.00									
	8/24/2021 Healey, Christopher J.	review key cases and outline same.	\$895	1		\$895.00									
	8/24/2021 Healey, Christopher J.	Review Trans Union and standing issues.	\$895	1		\$895.00									
	8/25/2021 Healey, Christopher J.	Prepare for class certification hearing.	\$895	3.8		\$3,401.00									
	8/25/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding hearing preparation.	\$895	1		\$895.00									
	8/25/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding hearing preparation.	\$895	0.2		\$179.00									
	8/25/2021 Healey, Christopher J.	Further preparation for class certification hearing.	\$895	2		\$1,790.00									
	8/26/2021 Healey, Christopher J.	Review and respond to Sunrise argument regarding Torres decision.	\$895	0.5		\$447.50									
	8/26/2021 Healey, Christopher J.	Prepare for class certification hearing.	\$895	8		\$7,160.00									
	8/26/2021 Healey, Christopher J.	Correspondence with Attorneys Wallace and Marks regarding hearing preparation.	\$895	0.3		\$268.50									
	8/27/2021 Healey, Christopher J.	Prepare for class certification hearing.	\$895	4.2		\$3,759.00	2	1,790.00							
	8/27/2021 Healey, Christopher J.	Attend class certification argument.	\$895	1.5		\$1,342.50									
	8/27/2021 Healey, Christopher J.	Telephone conference with team regarding status.	\$895	0.2		\$179.00			0.2	179.00					
	8/30/2021 Healey, Christopher J.	Prepare correspondence to team regarding class certification.	\$895	0.3		\$268.50									
	8/30/2021 Healey, Christopher J.	Review Sunrise's motion to strike Schroyer reply declaration.	\$895	0.3		\$268.50									
	8/30/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Schroyer reply declaration motion and response regarding same.	\$895	0.8		\$716.00									
	8/30/2021 Healey, Christopher J.	Follow-up correspondence regarding opposition to Schroyer reply declaration motion.	\$895	0.5		\$447.50									
	8/31/2021 Healey, Christopher J.	Review MacRae decision regarding adequate staffing right.	\$895	0.3		\$268.50									
	8/31/2021 Healey, Christopher J.	Draft insert regarding MacRae argument.	\$895	0.3		\$268.50									
	8/31/2021 Healey, Christopher J.	Analysis regarding Schroyer reply declaration motion to strike.	\$895	0.5		\$447.50									
	9/1/2021 Healey, Christopher J.	Prepare correspondence regarding research assignments.	\$895	0.2		\$179.00									
	9/2/2021 Healey, Christopher J.	Review case schedule.	\$895	0.1		\$89.50									
	9/2/2021 Healey, Christopher J.	Outline approach regarding continuance request.	\$895	0.2		\$179.00									
	9/2/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$895	0.1		\$89.50									
	9/2/2021 Healey, Christopher J.	Correspondence regarding sampling data for electronic assessment data.	\$895	0.2		\$179.00									
	9/2/2021 Healey, Christopher J.	Prepare correspondence to Patrick Kennedy regarding sampling protocol.	\$895	0.1		\$89.50									
	9/2/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding case schedule stipulation and assessment data issue.	\$895	0.3		\$268.50									
	9/2/2021 Healey, Christopher J.	Outline response to Schroyer motion to strike (reply declaration).	\$895	1.9		\$1,700.50									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	9/2/2021 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding class certification argument.	\$895	0.2		\$179.00									
	9/3/2021 Healey, Christopher J.	Draft outline of opposition to motion to strike Schroyer reply declaration.	\$895	0.5		\$447.50									
	9/6/2021 Healey, Christopher J.	Draft inserts to opposition to motion to strike Schroyer reply declaration.	\$895	3.4		\$3,043.00	1.4	1,253.00							
	9/7/2021 Healey, Christopher J.	Review Attorney Gorman's correspondence regarding case schedule.	\$895	0.1		\$89.50									
	9/7/2021 Healey, Christopher J.	Prepare correspondence regarding protective order research.	\$895	0.1		\$89.50									
	9/7/2021 Healey, Christopher J.	Telephone conference with Attorney Yarnall regarding same.	\$895	0.1		\$89.50									
	9/7/2021 Healey, Christopher J.	Respond to court reporter's inquiry regarding hearing transcript.	\$895	0.1		\$89.50									
	9/7/2021 Healey, Christopher J.	Revise opposition to Schroyer reply declaration.	\$895	0.6		\$537.00									
	9/7/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.1		\$89.50									
	9/7/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding case status and protective order issue.	\$895	0.2		\$179.00									
	9/7/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding case schedule stipulation.	\$895	0.2		\$179.00									
	9/7/2021 Myrick, Tracy R.	Send follow-up email to R. Bonner regarding status of Defendant SUN047, SUN048 AND SUN049 production import into review database.	\$195	0.1		\$19.50									
	9/7/2021 Myrick, Tracy R.	Update production log regarding same.	\$195	0.1		\$19.50									
	9/8/2021 Healey, Christopher J.	Review and comment on draft case schedule stipulation.	\$895	0.3		\$268.50									
	9/8/2021 Healey, Christopher J.	Review cases regarding protective order issue.	\$895	0.1		\$89.50									
	9/8/2021 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding potential stipulation regarding protective order issue.	\$895	0.2		\$179.00									
	9/8/2021 Healey, Christopher J.	Prepare correspondence to team regarding protective order issue.	\$895	0.2		\$179.00									
	9/8/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding protective order issue.	\$895	0.2		\$179.00									
	9/8/2021 Valero, Carmen A.	Research multiple issues re protective order violation claim by Sunrise, for C. Healey.	\$360	2		\$720.00									
	9/9/2021 Healey, Christopher J.	Review correspondence regarding case schedule stipulation.	\$895	0.1		\$89.50									
	9/9/2021 Healey, Christopher J.	Outline potential approach regarding Aegis information.	\$895	0.1		\$89.50									
	9/9/2021 Healey, Christopher J.	Review correspondence regarding expert costs.	\$895	0.1		\$89.50									
	9/9/2021 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$895	0.1		\$89.50									
	9/9/2021 Healey, Christopher J.	Research regarding protective order issues.	\$895	1		\$895.00									
	9/10/2021 Healey, Christopher J.	Prepare correspondence regarding case scheduling proposal.	\$895	0.1		\$89.50									
	9/10/2021 Healey, Christopher J.	Review research regarding protective order issues.	\$895	0.2		\$179.00									
	9/10/2021 Healey, Christopher J.	Prepare correspondence regarding same.	\$895	0.1		\$89.50									
	9/10/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding case schedule and protective order issues.	\$895	0.3		\$268.50									
	9/13/2021 Healey, Christopher J.	Revise inserts to Schroyer reply declaration motion to strike.	\$895	1.3		\$1,163.50									
	9/13/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.1		\$89.50									
	9/13/2021 Healey, Christopher J.	Correspondence regarding case scheduling stipulation.	\$895	0.2		\$179.00									
	9/13/2021 Healey, Christopher J.	Prepare correspondence to Patrick Kennedy regarding sampling protocol.	\$895	0.1		\$89.50									
	9/15/2021 Healey, Christopher J.	Prepare correspondence to Attorney Yarnall regarding motion to strike Schroyer reply declaration opposition.	\$895	0.1		\$89.50									
	9/15/2021 Healey, Christopher J.	Prepare correspondence regarding settlement status.	\$895	0.2		\$179.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	9/16/2021 Healey, Christopher J.	Review Sunrise's changes to case schedule stipulation.	\$895	0.1		\$89.50								
	9/17/2021 Healey, Christopher J.	Correspondence with Attorney Wallace regarding case theory.	\$895	0.1		\$89.50								
	9/17/2021 Healey, Christopher J.	Correspondence regarding motion to strike Schroyer reply declaration and opposition arguments.	\$895	0.1		\$89.50								
	9/17/2021 Healey, Christopher J.	Correspondence regarding assessment data and sampling protocol.	\$895	0.2		\$179.00								
	9/17/2021 Healey, Christopher J.	Prepare correspondence to team regarding response arguments regarding motion to strike Schroyer reply declaration.	\$895	0.5		\$447.50								
	9/20/2021 Healey, Christopher J.	Research regarding sampling protocol issues.	\$895	1.9		\$1,700.50								
	9/20/2021 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding billed services history.	\$895	0.1		\$89.50								
	9/20/2021 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding same.	\$895	0.1		\$89.50								
	9/20/2021 Myrick, Tracy R.	Run various searches across deposition transcripts in casenotebook regarding "Billed Services" and provide caseteam results from searches.	\$195	0.4		\$78.00								
	9/20/2021 Myrick, Tracy R.	Run various searches in Relativity concerning "Billed Services History" per caseteam.	\$195	0.2		\$39.00								
	9/21/2021 Healey, Christopher J.	Correspondence regarding expert cost issues.	\$895	0.1		\$89.50								
	9/21/2021 Healey, Christopher J.	Prepare for Patrick Kennedy call regarding sampling protocol.	\$895	0.4		\$358.00								
	9/21/2021 Healey, Christopher J.	Telephone conference with Patrick Kennedy regarding sampling protocol.	\$895	1		\$895.00								
	9/21/2021 Healey, Christopher J.	Follow-up correspondence regarding floor plans and facility size.	\$895	0.3		\$268.50								
	9/21/2021 Healey, Christopher J.	Outline to-do list for sampling protocol.	\$895	0.1		\$89.50								
	9/21/2021 Healey, Christopher J.	Prepare correspondence to team regarding expert cost allocation.	\$895	0.1		\$89.50								
	9/22/2021 Healey, Christopher J.	Correspondence regarding facility size issue.	\$895	0.1		\$89.50								
	9/22/2021 Healey, Christopher J.	Review court order regarding filing under seal.	\$895	0.1		\$89.50								
	9/22/2021 Healey, Christopher J.	Draft letter to Aegis counsel regarding protective order allegation by Sunrise.	\$895	1.3		\$1,163.50								
	9/22/2021 Healey, Christopher J.	Attend Olean en banc argument (via video link).	\$895	1		\$895.00								
	9/23/2021 Healey, Christopher J.	Review correspondence regarding facility floor plans.	\$895	0.1		\$89.50								
	9/23/2021 Healey, Christopher J.	Prepare correspondence to team regarding sampling protocol issues.	\$895	0.2		\$179.00								
	9/23/2021 Healey, Christopher J.	Follow-up correspondence regarding floor plans.	\$895	0.1		\$89.50								
	9/23/2021 Healey, Christopher J.	Revise draft letter regarding Aegis protective order.	\$895	0.4		\$358.00								
	9/23/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.2		\$179.00								
	9/23/2021 Myrick, Tracy R.	Export floor plans from review database and provide to caseteam.	\$195	0.5		\$97.50								
	9/24/2021 Healey, Christopher J.	Review Attorney Marks' correspondence regarding opposition to Schroyer motion to strike.	\$895	0.1		\$89.50								
	9/24/2021 Healey, Christopher J.	Prepare correspondence to team regarding Aegis' protective order letter.	\$895	0.1		\$89.50								
	9/24/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding opposition papers.	\$895	0.1		\$89.50								
	9/27/2021 Healey, Christopher J.	Review and respond to Attorney Wallace's correspondence regarding Schroyer motion to strike.	\$895	0.1		\$89.50								
	9/27/2021 Healey, Christopher J.	Revise outline of Schroyer declaration responding to motion to strike.	\$895	0.5		\$447.50								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	9/27/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Schroyer reply declaration opposition.	\$895	0.1	\$89.50								
	9/27/2021 Healey, Christopher J.	Review correspondence.	\$895	0.1	\$89.50								
	9/27/2021 Healey, Christopher J.	Review court order regarding case schedule.	\$895	0.1	\$89.50								
	9/27/2021 Healey, Christopher J.	Revise and comment on draft opposition to Schroyer reply motion to strike.	\$895	1.5	\$1,342.50								
	9/28/2021 Healey, Christopher J.	Review correspondence regarding Schroyer opposition.	\$895	0.1	\$89.50								
	9/28/2021 Healey, Christopher J.	Review draft Schroyer declaration regarding opposition brief.	\$895	0.3	\$268.50								
	9/28/2021 Healey, Christopher J.	Further revisions to Schroyer motion to strike opposition.	\$895	3.9	\$3,490.50								
	9/28/2021 Healey, Christopher J.	Correspondence regarding same.	\$895	0.2	\$179.00								
	9/28/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Schroyer declaration.	\$895	0.2	\$179.00								
	9/29/2021 Healey, Christopher J.	Correspondence with team regarding Schroyer motion to strike opposition.	\$895	0.3	\$268.50								
	9/29/2021 Healey, Christopher J.	Prepare correspondence regarding research request.	\$895	0.1	\$89.50								
	9/29/2021 Healey, Christopher J.	Review and comment on draft opposition brief.	\$895	0.3	\$268.50								
	9/29/2021 Healey, Christopher J.	Follow-up correspondence regarding research on expert discovery issue.	\$895	0.2	\$179.00								
	9/30/2021 Healey, Christopher J.	Review Attorney Umpierre's declaration and comments regarding same.	\$895	0.8	\$716.00								
	9/30/2021 Healey, Christopher J.	Correspondence regarding opposition insert.	\$895	0.1	\$89.50								
	9/30/2021 Healey, Christopher J.	Draft correspondence regarding opposition insert.	\$895	0.1	\$89.50								
	9/30/2021 Healey, Christopher J.	Draft correspondence regarding inserts to opposition brief.	\$895	0.5	\$447.50								
	9/30/2021 Healey, Christopher J.	Review cases regarding source code.	\$895	0.5	\$447.50								
	9/30/2021 Healey, Christopher J.	Draft insert regarding same.	\$895	0.8	\$716.00								
	9/30/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding brief.	\$895	0.2	\$179.00								
	9/30/2021 Healey, Christopher J.	Review and comment on Attorney Umpierre's declaration.	\$895	0.1	\$89.50								
	9/30/2021 Healey, Christopher J.	Telephone conferences with Attorney Marks regarding source code issue and Schroyer declaration.	\$895	0.2	\$179.00								
	9/30/2021 Healey, Christopher J.	Further review of cases regarding source code.	\$895	1	\$895.00								
	9/30/2021 Healey, Christopher J.	Correspondence to team regarding same.	\$895	0.7	\$626.50								
	9/30/2021 Healey, Christopher J.	Review and comment on updated Schroyer declaration.	\$895	0.9	\$805.50								
	10/1/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Schroyer declaration.	\$895	0.2	\$179.00								
	10/1/2021 Healey, Christopher J.	Outline to-do list regarding opposition brief.	\$895	0.1	\$89.50								
	10/1/2021 Healey, Christopher J.	Further telephone conference with Attorney Marks regarding mod file issues.	\$895	0.2	\$179.00								
	10/1/2021 Healey, Christopher J.	Review and revise opposition to Schroyer motion to strike	\$895	5.4	\$4,833.00	2	1,790.00						
	10/1/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.1	\$89.50								
	10/1/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding supporting declaration.	\$895	0.2	\$179.00								
	10/1/2021 Healey, Christopher J.	Further revisions to opposition brief.	\$895	0.3	\$268.50								
	10/1/2021 Healey, Christopher J.	Correspondence regarding mod file issue.	\$895	0.2	\$179.00								
	10/1/2021 Healey, Christopher J.	Review Attorney Umpierre's declaration.	\$895	0.5	\$447.50								
	10/1/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding opposition brief.	\$895	0.4	\$358.00								
	10/1/2021 Healey, Christopher J.	Telephone conference with team regarding opposition brief.	\$895	0.2	\$179.00			0.2	179.00				
	10/4/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Aegis correspondence.	\$895	0.1	\$89.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	10/4/2021 Healey, Christopher J.	Review and comment regarding Aegis correspondence.	\$895	0.2									
	10/4/2021 Healey, Christopher J.	Telephone conference with James Thornton regarding Flores' task time review.	\$895	0.1	\$89.50								
	10/4/2021 Healey, Christopher J.	Outline response regarding Sunrise's protective order argument.	\$895	0.6	\$537.00								
	10/4/2021 Healey, Christopher J.	Correspondence with Attorney Marks' team regarding source of task time data.	\$895	0.2	\$179.00								
	10/5/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Aegis call.	\$895	0.2	\$179.00								
	10/5/2021 Healey, Christopher J.	Prepare for Aegis call regarding protective order.	\$895	1	\$895.00								
	10/5/2021 Healey, Christopher J.	Review and revise correspondence to Aegis counsel regarding protective order argument.	\$895	0.4	\$358.00								
	10/5/2021 Healey, Christopher J.	Prepare presentation outline for Aegis call.	\$895	1	\$895.00								
	10/6/2021 Healey, Christopher J.	Prepare for Aegis call.	\$895	0.5	\$447.50								
	10/6/2021 Healey, Christopher J.	Research regarding Dual Deck decision.	\$895	1.2	\$1,074.00								
	10/6/2021 Healey, Christopher J.	Correspondence from Attorney Marks regarding Resolution Economics contact with MedModel.	\$895	0.2	\$179.00								
	10/6/2021 Valero, Carmen A.	Research federal cases supporting the proposition that not current information used by a company lacks sufficient economic value to warrant trade secret protection, for C. Healey.	\$360	2	\$720.00								
	10/7/2021 Healey, Christopher J.	Prepare for call regarding Resolution Economics' contact with MedModel.	\$895	0.5	\$447.50								
	10/7/2021 Healey, Christopher J.	Telephone conference with team regarding Resolution Economics contact.	\$895	0.7	\$626.50								
	10/7/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding preparation for Aegis call.	\$895	0.5	\$447.50				0.7	626.50			
	10/7/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Resolution Economics' response.	\$895	0.2	\$179.00								
	10/7/2021 Healey, Christopher J.	Review and comment on proposed response.	\$895	0.3	\$268.50								
	10/7/2021 Healey, Christopher J.	Review background documents regarding Aegis order.	\$895	0.3	\$268.50								
	10/8/2021 Healey, Christopher J.	Correspondence regarding Aegis call.	\$895	0.1	\$89.50								
	10/8/2021 Healey, Christopher J.	Review and comment regarding ProModel response to Resolution Economics' inquiry.	\$895	0.2	\$179.00								
	10/8/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Resolution Economics' correspondence.	\$895	0.1	\$89.50								
	10/8/2021 Healey, Christopher J.	Prepare for Aegis call.	\$895	0.8	\$716.00								
	10/8/2021 Healey, Christopher J.	Prepare correspondence to team regarding Aegis confidentiality designations.	\$895	0.5	\$447.50								
	10/8/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$895	0.2	\$179.00								
	10/8/2021 Valero, Carmen A.	Research issue of improper contact between expert consultant and opposing party's employee, for C. Healey.	\$360	2	\$720.00								
	10/11/2021 Healey, Christopher J.	Prepare for call with Aegis counsel.	\$895	0.2	\$179.00								
	10/11/2021 Healey, Christopher J.	Telephone conference with Aegis counsel regarding protective order issue.	\$895	0.5	\$447.50								
	10/11/2021 Healey, Christopher J.	Follow-up call with Attorney Umpierre regarding same.	\$895	0.1	\$89.50								
	10/11/2021 Healey, Christopher J.	Review research regarding expert contact issue.	\$895	0.3	\$268.50								
	10/11/2021 Healey, Christopher J.	Follow-up research regarding expert contact issue.	\$895	1	\$895.00								
	10/11/2021 Healey, Christopher J.	Prepare correspondence to Carmen Valero regarding follow-up research.	\$895	0.1	\$89.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	10/11/2021 Healey, Christopher J.	Prepare correspondence to team regarding proposed approach regarding expert contact.	\$895	0.2									
	10/12/2021 Healey, Christopher J.	Prepare correspondence regarding Sunrise's ex parte contact.	\$895	0.1									
	10/12/2021 Healey, Christopher J.	Review file regarding sampling protocol issue.	\$895	0.1									
	10/12/2021 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding same.	\$895	0.1									
	10/13/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding sampling protocol and simulation issues.	\$895	0.2									
	10/13/2021 Healey, Christopher J.	Review file regarding Daubert challenges to computer simulation models.	\$895	0.2									
	10/13/2021 Healey, Christopher J.	Follow-up correspondence regarding research assignment.	\$895	0.1									
	10/13/2021 Healey, Christopher J.	Telephone conference with Attorney Marks and James Thornton regarding sampling protocol issues.	\$895	0.8									
	10/13/2021 Healey, Christopher J.	Prepare correspondence to Pat Kennedy regarding same.	\$895	0.1									
	10/13/2021 Healey, Christopher J.	Outline approach regarding sampling protocol.	\$895	0.2									
	10/14/2021 Healey, Christopher J.	Review memo regarding mod file production.	\$895	0.5									
	10/14/2021 Healey, Christopher J.	Research regarding computer simulation and Daubert challenge.	\$895	0.5									
	10/14/2021 Healey, Christopher J.	Prepare for 10/29 hearing re motions to strike experts	\$895	0.3									
	10/14/2021 Healey, Christopher J.	Review and revise case schedule.	\$895	0.1									
	10/14/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.1									
	10/15/2021 Healey, Christopher J.	Review calibration/computer simulation research.	\$895	0.2									
	10/15/2021 Healey, Christopher J.	Telephone conference with Liam Reingold regarding research assistance.	\$895	0.2									
	10/15/2021 Healey, Christopher J.	Review and respond to Aegis' counsel inquiry regarding task time issue.	\$895	0.2									
	10/15/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$895	0.2									
	10/15/2021 Healey, Christopher J.	Review updated response to Aegis' inquiry.	\$895	0.1									
	10/15/2021 Healey, Christopher J.	Review and respond regarding draft response to Aegis' counsel regarding Ex. 45.	\$895	0.3									
	10/15/2021 Valero, Carmen A.	Research case law and secondary sources on issue of attorneys using intermediaries or conduits to circumvent ethical rules, for C. Healey.	\$360	1									
	10/18/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Aegis call regarding protective order.	\$895	0.3									
	10/18/2021 Healey, Christopher J.	Review correspondence from Aegis' counsel regarding same.	\$895	0.1									
	10/18/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Aegis' inquiry.	\$895	0.1									
	10/18/2021 Healey, Christopher J.	Review correspondence.	\$895	0.1									
	10/19/2021 Healey, Christopher J.	Outline suggested approach regarding Aegis protective order issue.	\$895	0.8									
	10/19/2021 Healey, Christopher J.	Review correspondence.	\$895	0.1									
	10/19/2021 Healey, Christopher J.	Review reply briefs on Sunrise's motions to strike expert declarations.	\$895	1.4									
	10/19/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding approach.	\$895	0.3									
	10/19/2021 Healey, Christopher J.	Review and revise meet and confer correspondence with Aegis counsel.	\$895	1									
	10/20/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding meet and confer letter.	\$895	0.2									

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	10/20/2021 Healey, Christopher J.	Further telephone conference with Attorney Umpierre regarding proposed approach.	\$895	0.3	\$268.50								
	10/20/2021 Healey, Christopher J.	Review correspondence.	\$895	0.1	\$89.50								
	10/20/2021 Healey, Christopher J.	Prepare for motion to strike argument.	\$895	2.2	\$1,969.00	1	895.00						
	10/20/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding protective order issue.	\$895	0.5	\$447.50								
	10/20/2021 Healey, Christopher J.	Prepare correspondence to team regarding approach on protective order.	\$895	0.3	\$268.50								
	10/20/2021 Healey, Christopher J.	Prepare correspondence regarding prep call for hearing.	\$895	0.2	\$179.00								
	10/21/2021 Healey, Christopher J.	Review and revise compromise proposal regarding Aegis task time information.	\$895	1	\$895.00								
	10/21/2021 Healey, Christopher J.	Review correspondence.	\$895	0.1	\$89.50								
	10/21/2021 Healey, Christopher J.	Prepare for motion to strike hearing.	\$895	2.3	\$2,058.50	1	895.00						
	10/21/2021 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding meeting and confer.	\$895	0.1	\$89.50								
	10/21/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$895	0.3	\$268.50								
	10/21/2021 Healey, Christopher J.	Telephone conference with Patrick Kennedy regarding sampling protocol.	\$895	0.3	\$268.50								
	10/21/2021 Healey, Christopher J.	Follow-up correspondence regarding same.	\$895	0.2	\$179.00								
	10/21/2021 Healey, Christopher J.	Prepare for motion to strike hearing.	\$895	2.3	\$2,058.50								
	10/22/2021 Healey, Christopher J.	Review Attorney Umpierre's correspondence regarding Aegis meet and confer.	\$895	0.1	\$89.50								
	10/22/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding potential Aegis stipulation.	\$895	0.3	\$268.50								
	10/25/2021 Healey, Christopher J.	Prepare for motion to strike hearing.	\$895	4.1	\$3,669.50	1	895.00						
	10/25/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding Aegis meet and confer discussions.	\$895	0.5	\$447.50								
	10/25/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Aegis meet and confer.	\$895	0.4	\$358.00								
	10/25/2021 Healey, Christopher J.	Prepare correspondence to team regarding additional response points regarding motion to strike.	\$895	0.5	\$447.50								
	10/26/2021 Healey, Christopher J.	Prepare for motion to strike hearing.	\$895	4.3	\$3,848.50	1	895.00						
	10/26/2021 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding Aegis protective order issues.	\$895	0.5	\$447.50								
	10/26/2021 Healey, Christopher J.	Follow-up correspondence regarding same.	\$895	0.2	\$179.00								
	10/27/2021 Healey, Christopher J.	Review Attorney Marks' comments regarding Sunrise reply argument.	\$895	0.2	\$179.00								
	10/27/2021 Healey, Christopher J.	Outline responses to Sunrise argument.	\$895	0.5	\$447.50								
	10/27/2021 Healey, Christopher J.	Correspondence with team regarding motion to strike hearing preparation.	\$895	0.2	\$179.00								
	10/27/2021 Healey, Christopher J.	Prepare for motion to strike hearing.	\$895	3.5	\$3,132.50								
	10/27/2021 Healey, Christopher J.	Telephone conference with team regarding motion to strike hearing preparation.	\$895	1.5	\$1,342.50			1.5	1,342.50				
	10/27/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre and review Aegis email regarding protective order.	\$895	0.2	\$179.00								
	10/27/2021 Healey, Christopher J.	Review Crandall reply declaration.	\$895	0.3	\$268.50								
	10/27/2021 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding same.	\$895	0.2	\$179.00								
	10/27/2021 Healey, Christopher J.	Further preparation for motion to strike hearing.	\$895	0.6	\$537.00								
	10/28/2021 Healey, Christopher J.	Prepare for motion to strike hearing.	\$895	2.4	\$2,148.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>			
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	10/28/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding hearing preparation.	\$895	0.2		\$179.00								
	10/28/2021 Healey, Christopher J.	Correspondence with Patrick Kennedy regarding hearing preparation.	\$895	0.1		\$89.50								
	10/28/2021 Healey, Christopher J.	Review and comment on correspondence regarding Aegis' protective order.	\$895	0.2		\$179.00								
	10/28/2021 Healey, Christopher J.	Review court order regarding motion to strike hearing and correspondence to team regarding same.	\$895	0.2		\$179.00								
	10/28/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Crandall declaration and objection to same.	\$895	0.2		\$179.00								
	10/29/2021 Healey, Christopher J.	Prepare correspondence regarding objection to Crandall declaration and errata notice.	\$895	0.1		\$89.50								
	10/29/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Crandall objection.	\$895	0.2		\$179.00								
	10/29/2021 Healey, Christopher J.	Office conference regarding record review.	\$895	0.1		\$89.50								
	10/29/2021 Healey, Christopher J.	Draft objections to Crandall reply declaration.	\$895	1.3		\$1,163.50								
	10/29/2021 Healey, Christopher J.	Draft errata notice.	\$895	0.5		\$447.50								
	10/30/2021 Healey, Christopher J.	Prepare for motion to strike hearing.	\$895	2.1		\$1,879.50								
	10/31/2021 Healey, Christopher J.	Review Attorney Marks' email regarding response to Crandall declaration.	\$895	0.1		\$89.50								
	10/31/2021 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding Wolin/Nissan.	\$895	0.1		\$89.50								
	10/31/2021 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding Sunrise's argument regarding "room and program" fee.	\$895	0.2		\$179.00								
	10/31/2021 Healey, Christopher J.	Prepare for motion to strike hearing.	\$895	2.3		\$2,058.50								
	10/31/2021 Healey, Christopher J.	Review correspondence from Attorney Wallace regarding Nissan.	\$895	0.1		\$89.50								
	11/1/2021 Healey, Christopher J.	Review and comment on ProModel declaration.	\$895	0.2		\$179.00								
	11/1/2021 Healey, Christopher J.	Prepare for motion to strike hearing.	\$895	1.6		\$1,432.00								
	11/1/2021 Healey, Christopher J.	Review and comment regarding Umpierre declaration regarding Errata.	\$895	0.1		\$89.50								
	11/1/2021 Healey, Christopher J.	Revise errata.	\$895	0.1		\$89.50								
	11/1/2021 Healey, Christopher J.	Review and revise objections to Crandall reply declaration.	\$895	1.5		\$1,342.50								
	11/1/2021 Healey, Christopher J.	Telephone conferences with Attorneys Wallace and Marks regarding objections filing.	\$895	0.3		\$268.50								
	11/1/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.2		\$179.00								
	11/2/2021 Healey, Christopher J.	Prepare for motion to strike hearing.	\$895	2		\$1,790.00								
	11/2/2021 Healey, Christopher J.	Prepare for Kennedy call.	\$895	0.3		\$268.50								
	11/2/2021 Healey, Christopher J.	Telephone conference with Kennedy regarding motion to strike hearing.	\$895	1		\$895.00								
	11/2/2021 Healey, Christopher J.	Further preparation for motion to strike hearing.	\$895	2.3		\$2,058.50								
	11/3/2021 Healey, Christopher J.	Outline to-do issues for motion to strike argument.	\$895	0.2		\$179.00								
	11/3/2021 Healey, Christopher J.	Prepare for motion to strike argument.	\$895	3.1		\$2,774.50								
	11/3/2021 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding TIFF production issue.	\$895	0.2		\$179.00								
	11/3/2021 Healey, Christopher J.	Review and revise errata regarding Schroyer declaration.	\$895	0.2		\$179.00								
	11/3/2021 Healey, Christopher J.	Review and respond regarding response on "missing 148 hrs" issue.	\$895	0.2		\$179.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	11/4/2021 Healey, Christopher J.	Revise errata notice.	\$895	0.2		\$179.00								
	11/4/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.2		\$179.00								
	11/4/2021 Healey, Christopher J.	Prepare for motion to strike hearing.	\$895	4.3		\$3,848.50	2	1,790.00						
	11/5/2021 Healey, Christopher J.	Prepare for motion to strike hearing.	\$895	3.5		\$3,132.50	1	895.00						
	11/5/2021 Healey, Christopher J.	Attend motion to strike hearing.	\$895	0.8		\$716.00								
	11/5/2021 Healey, Christopher J.	Telephone conference with co-counsel regarding hearing.	\$895	0.2		\$179.00								
	11/8/2021 Healey, Christopher J.	Review court filing regarding hearing transcript.	\$895	0.1		\$89.50								
	11/10/2021 Healey, Christopher J.	Correspondence with Attorney Wallace regarding expert cost issues.	\$895	0.1		\$89.50								
	11/10/2021 Healey, Christopher J.	Prepare correspondence to team regarding fees/costs.	\$895	0.1		\$89.50								
	11/10/2021 Healey, Christopher J.	Correspondence regarding potential settlement issues.	\$895	0.2		\$179.00								
	11/10/2021 Healey, Christopher J.	Telephone conference with team regarding potential settlement.	\$895	1		\$895.00			1	895.00				
	11/10/2021 Healey, Christopher J.	Follow-up correspondence regarding same.	\$895	0.1		\$89.50								
	11/11/2021 Healey, Christopher J.	Correspondence regarding settlement status.	\$895	0.1		\$89.50								
	11/12/2021 Healey, Christopher J.	Outline potential settlement approach.	\$895	0.1		\$89.50								
	11/15/2021 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding expert costs.	\$895	0.1		\$89.50								
	11/15/2021 Healey, Christopher J.	Prepare summary regarding expert costs.	\$895	0.1		\$89.50								
	11/15/2021 Healey, Christopher J.	Research regarding claims mode settlements.	\$895	0.5		\$447.50								
	11/16/2021 Healey, Christopher J.	Review court decision regarding class certification and motions to strike.	\$895	0.2		\$179.00								
	11/16/2021 Healey, Christopher J.	Correspondence with team regarding status and to-do.	\$895	0.3		\$268.50								
	11/16/2021 Healey, Christopher J.	Outline to-do issues.	\$895	0.5		\$447.50								
	11/16/2021 Healey, Christopher J.	Research regarding Rule 23(f) petition.	\$895	0.2		\$179.00								
	11/16/2021 Healey, Christopher J.	Correspondence with Attorney Wallace regarding Rule 23(f) opposition.	\$895	0.2		\$179.00								
	11/16/2021 Healey, Christopher J.	Prepare correspondence to team regarding discovery to-do issues.	\$895	0.5		\$447.50								
	11/17/2021 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding trial preparation.	\$895	0.1		\$89.50								
	11/17/2021 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding discovery and experts.	\$895	0.2		\$179.00								
	11/17/2021 Healey, Christopher J.	Correspondence with Attorney Marks regarding DES analysis.	\$895	0.2		\$179.00								
	11/17/2021 Healey, Christopher J.	Telephone conference with team regarding discovery motions and related issues.	\$895	0.8		\$716.00			0.8	716.00				
	11/17/2021 Healey, Christopher J.	Correspondence regarding letter to Discovery Master.	\$895	0.5		\$447.50								
	11/17/2021 Healey, Christopher J.	Review court decision regarding class certification and motion to strike.	\$895	0.5		\$447.50								
	11/17/2021 Healey, Christopher J.	Telephone conference with Tracy Myrick regarding review of admission agreements.	\$895	0.3		\$268.50								
	11/17/2021 Healey, Christopher J.	Correspondence regarding discovery motions.	\$895	0.2		\$179.00								
	11/17/2021 Healey, Christopher J.	Correspondence with Patrick Kennedy regarding sampling protocol.	\$895	0.1		\$89.50								
	11/17/2021 Healey, Christopher J.	Outline letter to Discovery Master.	\$895	0.3		\$268.50								
	11/17/2021 Healey, Christopher J.	Correspondence with Mediator Kaplan regarding class certification ruling.	\$895	0.1		\$89.50								
	11/17/2021 Healey, Christopher J.	Review research correspondence regarding confidential designation.	\$895	0.1		\$89.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	11/17/2021 Healey, Christopher J.	Review research regarding class counsel designation.	\$895	0.2		\$179.00								
	11/18/2021 Healey, Christopher J.	Draft letter to Discovery Master regarding request for discovery conference.	\$895	1.3		\$1,163.50								
	11/18/2021 Healey, Christopher J.	Review and revise meet and confer letter regarding class member issues.	\$895	1		\$895.00								
	11/18/2021 Healey, Christopher J.	Prepare correspondence regarding class notice order.	\$895	0.3		\$268.50								
	11/18/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding meet and confer letter.	\$895	0.5		\$447.50								
	11/18/2021 Healey, Christopher J.	File review regarding same.	\$895	0.5		\$447.50								
	11/18/2021 Healey, Christopher J.	Review and revise meet and confer letter.	\$895	0.2		\$179.00								
	11/18/2021 Healey, Christopher J.	Review class list.	\$895	0.2		\$179.00								
	11/18/2021 Healey, Christopher J.	Prepare correspondence regarding expert costs.	\$895	0.2		\$179.00								
	11/18/2021 Healey, Christopher J.	Revise cost spreadsheet.	\$895	0.2		\$179.00								
	11/18/2021 Healey, Christopher J.	Outline defendants' potential arguments on Rule 23(f) and summary judgment motions.	\$895	0.2		\$179.00								
	11/18/2021 Healey, Christopher J.	Outline projected costs through trial.	\$895	0.1		\$89.50								
	11/18/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding trial preparation and costs.	\$895	0.5		\$447.50								
	11/19/2021 Healey, Christopher J.	Outline to do items for trial preparation.	\$895	1		\$895.00								
	11/19/2021 Healey, Christopher J.	Correspondence to team regarding trial preparation meeting.	\$895	0.3		\$268.50								
	11/19/2021 Healey, Christopher J.	Review analysis of Sunrise class list spreadsheet.	\$895	0.2		\$179.00								
	11/19/2021 Myrick, Tracy R.	Review declarations and provide caseteam with findings regarding Defendants review of resident agreements concerning acceptance of arbitration.	\$195	0.7		\$136.50								
	11/20/2021 Healey, Christopher J.	Outline trial preparation tasks.	\$895	1		\$895.00								
	11/20/2021 Healey, Christopher J.	Review pretrial conference requirements.	\$895	0.5		\$447.50								
	11/20/2021 Healey, Christopher J.	Correspondence to Attorney Warren regarding draft class notice.	\$895	0.1		\$89.50								
	11/20/2021 Healey, Christopher J.	Correspondence regarding exemplar pretrial conference pleadings.	\$895	0.1		\$89.50								
	11/20/2021 Healey, Christopher J.	Revise draft class list and notes regarding same.	\$895	0.5		\$447.50								
	11/20/2021 Healey, Christopher J.	Review authority re sealing issue and response.	\$895	0.3		\$268.50								
	11/20/2021 Healey, Christopher J.	Correspondence regarding class notice issues.	\$895	0.2		\$179.00								
	11/20/2021 Healey, Christopher J.	Follow-up note regarding same.	\$895	0.1		\$89.50								
	11/21/2021 Healey, Christopher J.	Correspondence regarding class notice issues.	\$895	0.2		\$179.00								
	11/21/2021 Healey, Christopher J.	Outline approach regarding class notice.	\$895	0.3		\$268.50								
	11/22/2021 Healey, Christopher J.	Notes regarding class notice plan.	\$895	0.5		\$447.50								
	11/22/2021 Healey, Christopher J.	Miscellaneous trial preparation.	\$895	1		\$895.00								
	11/22/2021 Healey, Christopher J.	Correspondence regarding estimated notice costs.	\$895	0.1		\$89.50								
	11/22/2021 Healey, Christopher J.	Draft memorandum of contentions.	\$895	2.4		\$2,148.00								
	11/22/2021 Healey, Christopher J.	Review comments regarding draft class notice.	\$895	0.2		\$179.00								
	11/22/2021 Healey, Christopher J.	Review Attorney Gorman's email regarding meet and confer.	\$895	0.1		\$89.50								
	11/22/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$895	0.2		\$179.00								
	11/23/2021 Healey, Christopher J.	Correspondence to team regarding trial preparation sessions.	\$895	0.1		\$89.50								
	11/23/2021 Healey, Christopher J.	Review discovery motions.	\$895	0.4		\$358.00								
	11/23/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$895	0.5		\$447.50								
	11/23/2021 Healey, Christopher J.	Revise discovery motion.	\$895	1		\$895.00								
	11/23/2021 Healey, Christopher J.	Revise response to Attorney Gorman.	\$895	0.5		\$447.50								
	11/23/2021 Healey, Christopher J.	Prepare correspondence regarding same.	\$895	0.1		\$89.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	11/23/2021 Healey, Christopher J.	Revise omnibus discovery motion.	\$895	2.2		\$1,969.00							
	11/24/2021 Healey, Christopher J.	Review and revise long form class notice.	\$895	0.7		\$626.50							
	11/24/2021 Healey, Christopher J.	Research regarding notice distribution plan.	\$895	0.5		\$447.50							
	11/24/2021 Healey, Christopher J.	Correspondence with Attorney Johnson regarding class notice.	\$895	0.3		\$268.50							
	11/24/2021 Healey, Christopher J.	Telephone conference with Attorney Johnson regarding class notice and related issues.	\$895	0.7		\$626.50							
	11/24/2021 Healey, Christopher J.	Review memorandum of contentions.	\$895	0.3		\$268.50							
	11/24/2021 Healey, Christopher J.	Revise memorandum of contentions.	\$895	0.5		\$447.50							
	11/25/2021 Healey, Christopher J.	Review cases regarding sealing issues.	\$895	1		\$895.00							
	11/26/2021 Healey, Christopher J.	Review and comment on draft notice plan.	\$895	0.5		\$447.50							
	11/26/2021 Healey, Christopher J.	Review and comment on class notices.	\$895	0.2		\$179.00							
	11/26/2021 Healey, Christopher J.	Correspondence re Sunrise sealing declaration.	\$895	0.2		\$179.00							
	11/27/2021 Healey, Christopher J.	Correspondence with Attorney Johnson regarding notice issues.	\$895	0.1		\$89.50							
	11/27/2021 Healey, Christopher J.	Review updated draft of notice and order.	\$895	0.1		\$89.50							
	11/29/2021 Healey, Christopher J.	Review correspondence regarding class notice.	\$895	0.1		\$89.50							
	11/29/2021 Healey, Christopher J.	Correspondence regarding class counsel list.	\$895	0.2		\$179.00							
	11/29/2021 Healey, Christopher J.	Draft correspondence to Judge Guilford regarding discovery motions.	\$895	0.2		\$179.00							
	11/29/2021 Healey, Christopher J.	Draft response to Sunrise sealing request.	\$895	0.8		\$716.00							
	11/29/2021 Healey, Christopher J.	Correspondence to team regarding same.	\$895	0.2		\$179.00							
	11/29/2021 Healey, Christopher J.	Draft stipulation regarding class counsel list.	\$895	0.3		\$268.50							
	11/29/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery meet and confer.	\$895	0.2		\$179.00							
	11/29/2021 Healey, Christopher J.	Review Attorney Wallace changes to sealing response brief and revise same.	\$895	0.3		\$268.50							
	11/29/2021 Healey, Christopher J.	Review and revise note to Attorney Gorman regarding discovery schedule.	\$895	0.2		\$179.00							
	11/29/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery motions.	\$895	0.1		\$89.50							
	11/30/2021 Healey, Christopher J.	Review supporting declarations to discovery motions.	\$895	0.5		\$447.50							
	11/30/2021 Healey, Christopher J.	Legal research regarding Rule 23(f) petitions.	\$895	0.3		\$268.50							
	11/30/2021 Healey, Christopher J.	Revise discovery brief (final discovery requests).	\$895	1.4		\$1,253.00							
	11/30/2021 Healey, Christopher J.	Correspondence to Attorney Umpierre regarding discovery issues.	\$895	0.1		\$89.50							
	11/30/2021 Healey, Christopher J.	Review and finalize response regarding sealing request.	\$895	0.1		\$89.50							
	11/30/2021 Healey, Christopher J.	Revise response to Attorney Gorman regarding discovery motions schedule.	\$895	0.2		\$179.00							
	11/30/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery motions.	\$895	0.2		\$179.00							
	11/30/2021 Healey, Christopher J.	Review updated discovery motions and revise same.	\$895	0.3		\$268.50							
	12/1/2021 Healey, Christopher J.	Correspondence regarding discovery motions.	\$895	0.3		\$268.50							
	12/1/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$895	0.2		\$179.00							
	12/1/2021 Healey, Christopher J.	Review Sunrise's Rule 23(f) petition.	\$895	0.2		\$179.00							
	12/1/2021 Healey, Christopher J.	Outline responses to Rule 23 petition.	\$895	0.2		\$179.00							
	12/1/2021 Healey, Christopher J.	Prepare correspondence regarding discovery motion research.	\$895	0.2		\$179.00							
	12/1/2021 Healey, Christopher J.	Research regarding sample size.	\$895	0.2		\$179.00							
	12/1/2021 Healey, Christopher J.	Correspondence regarding trial preparation meeting.	\$895	0.1		\$89.50							
	12/1/2021 Healey, Christopher J.	Research and analysis regarding Rule 23(f) petition.	\$895	1		\$895.00							

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
		Telephone conference with Attorney Wallace regarding Rule 23 response.	\$895	0.8	\$716.00								
		Draft opposition to Rule 23(f) petition.	\$895	2.3	\$2,058.50								
		Office conference regarding discovery motion issues.	\$895	0.2	\$179.00								
		Prepare to-do list regarding Rule 23(f) response.	\$895	0.2	\$179.00								
		Draft Rule 23(f) response.	\$895	5	\$4,475.00								
		Research regarding TranUnion application in caselaw.	\$895	1.2	\$1,074.00								
		Outline inserts to Rule 23(f) petition response.	\$895	0.3	\$268.50								
		Revise stipulation regarding Attorney Warren as class counsel.	\$895	0.2	\$179.00								
		Prepare correspondence regarding Defendants' breaking point argument.	\$895	0.1	\$89.50								
		Draft opposition to Rule 23(f) petition.	\$895	4.6	\$4,117.00								
		Research and draft response to Rule 23(f) petition.	\$895	4	\$3,580.00	2	1,790.00						
		Outline arguments regarding expert evidence section.	\$895	0.3	\$268.50								
		Draft response to Rule 23(f) petition.	\$895	1.5	\$1,342.50								
		Prepare correspondence to Attorney Wallace regarding same.	\$895	0.1	\$89.50								
		Further drafting response to Rule 23(f) petition.	\$895	3.7	\$3,311.50	1	895.00						
		Correspondence with Attorney Wallace regarding draft brief.	\$895	0.2	\$179.00								
		Review and revise Attorney Wallace's inserts.	\$895	1	\$895.00								
		Research scope of permissible post-certification discovery, for C. Healey.	\$360	1	\$360.00								
		Review Chambers Amicus brief.	\$895	0.3	\$268.50								
		Research and outline responses to same.	\$895	1	\$895.00								
		Telephone conference with Attorney Wallace regarding Amicus brief and response.	\$895	0.3	\$268.50								
		Correspondence with Amicus counsel regarding consent request.	\$895	0.2	\$179.00								
		Revise and draft Rule 23(f) petition response.	\$895	3.7	\$3,311.50								
		Telephone conference with Attorney Wallace regarding 23(f) response.	\$895	0.2	\$179.00								
		Draft and revise response brief.	\$895	3	\$2,685.00								
		Review status regarding class notice meet and confer.	\$895	0.1	\$89.50								
		Prepare correspondence regarding class notice meet and confer.	\$895	0.3	\$268.50								
		Review American Pipe caselaw.	\$895	0.3	\$268.50								
		Review Attorney Wallace's edits to Rule 23(f) response.	\$895	0.3	\$268.50								
		Revise Rule 23(f) response.	\$895	2.5	\$2,237.50								
		Revise Rule 23(f) response.	\$895	3	\$2,685.00								
		Correspondence with Attorney Wallace regarding same.	\$895	0.1	\$89.50								
		Review Sunrise's changes in proposed class notice.	\$895	0.5	\$447.50								
		Telephone conference with Attorney Umpierre regarding same.	\$895	0.3	\$268.50								
		Prepare correspondence to team regarding class notice.	\$895	0.5	\$447.50								
		Research and analysis regarding class notice issues.	\$895	1	\$895.00								
		Telephone conference with Attorney Umpierre regarding class notices/notice plan.	\$895	0.5	\$447.50								
		Research and analysis regarding discretionary notice issues.	\$895	1.1	\$984.50								
		Correspondence regarding class notice/notice plan issues.	\$895	0.5	\$447.50								
		Prepare correspondence to Attorney Umpierre regarding notification letter to declarants.	\$895	0.2	\$179.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	12/9/2021 Howard, Kathryn M.	Analysis of Opposition to Petition for Permission to Appeal under Rule 23(F) including checking all legal citations and revising same.	\$325	2.1		\$682.50									
	12/9/2021 Howard, Kathryn M.	Finalize opposition and prepare email to C. Healey.	\$325	0.2											
	12/10/2021 Healey, Christopher J.	Review Attorney Wallace's revisions to Rule 23(f) brief.	\$895	0.3		\$268.50									
	12/10/2021 Healey, Christopher J.	Review Attorney Johnson's comments regarding long form notice.	\$895	0.3		\$268.50									
	12/10/2021 Healey, Christopher J.	Correspondence regarding same.	\$895	0.3		\$268.50									
	12/10/2021 Healey, Christopher J.	Telephone conference with Attorney Johnson regarding long form class notice.	\$895	0.2		\$179.00									
	12/10/2021 Healey, Christopher J.	Revise joint statement regarding notice issue.	\$895	0.8		\$716.00									
	12/10/2021 Healey, Christopher J.	Review final revisions to Rule 23(f) opposition.	\$895	0.5		\$447.50									
	12/10/2021 Healey, Christopher J.	Draft joint statement regarding class notice issues.	\$895	1.8		\$1,611.00									
	12/10/2021 Healey, Christopher J.	Telephone conferences with Attorney Umpierre regarding same.	\$895	0.5		\$447.50									
	12/10/2021 Healey, Christopher J.	Revise class notice order.	\$895	0.2		\$179.00									
	12/10/2021 Healey, Christopher J.	Review and revise short form class notice to non-class members.	\$895	0.2		\$179.00									
	12/10/2021 Howard, Kathryn M.	Follow-up communication with C. Healey regarding the brief.	\$325	0.1		\$32.50									
	12/10/2021 Howard, Kathryn M.	Follow-up communication with L. Valdez regarding the brief.	\$325	0.1		\$32.50									
	12/11/2021 Healey, Christopher J.	Prepare correspondence to team regarding proposed approach regarding notice plan.	\$895	0.8		\$716.00									
	12/11/2021 Healey, Christopher J.	Review Attorney Johnson's correspondence regarding same.	\$895	0.1		\$89.50									
	12/13/2021 Healey, Christopher J.	Review Attorney Johnson's correspondence regarding class notice.	\$895	0.1		\$89.50									
	12/13/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding request for class list.	\$895	0.2		\$179.00									
	12/13/2021 Healey, Christopher J.	Telephone conference with Lindsay Pettite regarding sampling approach.	\$895	0.2		\$179.00									
	12/13/2021 Healey, Christopher J.	Review meet and confer correspondence regarding class list.	\$895	0.1		\$89.50									
	12/13/2021 Healey, Christopher J.	Prepare to-do list.	\$895	1.2		\$1,074.00									
	12/13/2021 Healey, Christopher J.	Prepare for team meeting regarding trial preparation.	\$895	2.4		\$2,148.00		2	1,790.00						
	12/13/2021 Healey, Christopher J.	Correspondence with Attorney Stebner regarding settlement discussions.	\$895	0.3		\$268.50									
	12/14/2021 Healey, Christopher J.	Prepare for Austin trial analysis meeting.	\$895	0.2		\$179.00									
	12/14/2021 Healey, Christopher J.	Prepare correspondence to team regarding settlement status.	\$895	0.5		\$447.50									
	12/14/2021 Healey, Christopher J.	Draft memorandum of contentions.	\$895	5.2		\$4,654.00		2	1,790.00						
	12/14/2021 Healey, Christopher J.	Prepare correspondence to team.	\$895	0.5		\$447.50									
	12/15/2021 Healey, Christopher J.	Review filed discovery motions.	\$895	0.1		\$89.50									
	12/15/2021 Healey, Christopher J.	Correspondence regarding Rule 23(f) ruling.	\$895	0.1		\$89.50									
	12/15/2021 Healey, Christopher J.	Review Defendants' responses regarding discovery motions.	\$895	0.2		\$179.00									
	12/15/2021 Healey, Christopher J.	Telephone conference with Patrick Kennedy regarding sampling protocol.	\$895	0.7		\$626.50									
	12/15/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.5		\$447.50									
	12/15/2021 Healey, Christopher J.	Review Attorney Gorman's correspondence regarding class notice issue.	\$895	0.1		\$89.50									
	12/15/2021 Healey, Christopher J.	Prepare correspondence regarding response to Attorney Gorman.	\$895	0.1		\$89.50									
	12/15/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding discovery motions.	\$895	0.1		\$89.50									

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	12/16/2021 Healey, Christopher J.	Review Defendants' argument regarding discovery motions.	\$895	0.8	\$716.00								
	12/16/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$895	0.5	\$447.50								
	12/16/2021 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding discovery motions.	\$895	0.1	\$89.50								
	12/16/2021 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding sampling protocol.	\$895	0.1	\$89.50								
	12/16/2021 Healey, Christopher J.	Correspondence regarding trial prep meeting.	\$895	0.1	\$89.50								
	12/16/2021 Healey, Christopher J.	Correspondence regarding discovery motions.	\$895	0.1	\$89.50								
	12/16/2021 Healey, Christopher J.	Telephone conference with team regarding trial prep issues.	\$895	2	\$1,790.00			2	1,790.00				
	12/16/2021 Healey, Christopher J.	Prepare for team call.	\$895	0.2	\$179.00								
	12/16/2021 Healey, Christopher J.	Telephone conference with Patrick Kennedy regarding sampling issues.	\$895	0.2	\$179.00								
	12/16/2021 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$895	0.2	\$179.00								
	12/17/2021 Healey, Christopher J.	Draft supplemental brief regarding lay depositions.	\$895	5.5	\$4,922.50	1	895.00						
	12/17/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding omnibus discovery brief.	\$895	0.5	\$447.50								
	12/17/2021 Healey, Christopher J.	Telephone conference with team regarding reply approach and related issues.	\$895	0.5	\$447.50			0.5	447.50				
	12/18/2021 Healey, Christopher J.	Revise supplemental brief regarding document requests.	\$895	4.5	\$4,027.50								
	12/18/2021 Healey, Christopher J.	Telephone conferences with Attorney Umpierre regarding opposition briefs.	\$895	0.5	\$447.50								
	12/18/2021 Healey, Christopher J.	Research regarding control issue.	\$895	1	\$895.00								
	12/18/2021 Healey, Christopher J.	Revise supplemental brief regarding document requests.	\$895	1	\$895.00								
	12/19/2021 Healey, Christopher J.	Further revisions to document requests supplemental brief.	\$895	2.1	\$1,879.50	1	895.00						
	12/19/2021 Healey, Christopher J.	Review key documents to support supplemental brief.	\$895	1	\$895.00								
	12/19/2021 Healey, Christopher J.	Further revisions to briefs.	\$895	0.5	\$447.50								
	12/19/2021 Healey, Christopher J.	Draft joint statement regarding notice plan issues.	\$895	1	\$895.00								
	12/19/2021 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding same.	\$895	0.5	\$447.50								
	12/19/2021 Healey, Christopher J.	Review key documents regarding control issues.	\$895	1	\$895.00								
	12/19/2021 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding same.	\$895	0.2	\$179.00								
	12/19/2021 Healey, Christopher J.	Prepare correspondence to Tracy Myrick regarding document search.	\$895	0.1	\$89.50								
	12/20/2021 Healey, Christopher J.	Revise joint statement regarding class notice order.	\$895	2.2	\$1,969.00								
	12/20/2021 Healey, Christopher J.	Outline revisions to discovery briefs.	\$895	0.2	\$179.00								
	12/20/2021 Healey, Christopher J.	Revise discovery reply briefs.	\$895	1.5	\$1,342.50								
	12/20/2021 Healey, Christopher J.	Final revisions to discovery briefs.	\$895	2	\$1,790.00								
	12/20/2021 Healey, Christopher J.	Telephone conference with Attorney Marks regarding move-out data issue.	\$895	0.2	\$179.00								
	12/20/2021 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding briefs.	\$895	0.2	\$179.00								
	12/20/2021 Healey, Christopher J.	Review correspondence regarding briefs.	\$895	0.3	\$268.50								
	12/20/2021 Myrick, Tracy R.	Work with data set to import into review database according to established specifications.	\$195	0.1	\$19.50								
	12/20/2021 Myrick, Tracy R.	Update search indexes as necessary and appropriate.	\$195	0.1	\$19.50								
	12/20/2021 Myrick, Tracy R.	Perform data validation steps and document all relevant details.	\$195	0.1	\$19.50								
	12/20/2021 Cruz, Michael	Cite check Plaintiffs Supp. Brief in support of Motion for Lay Witness Depositions & Supp. Memo in support of Motion to Compel Further Discovery	\$265	1.1	\$291.50	1.1	291.5						
	12/21/2021 Myrick, Tracy R.	Phone call with C. Healey regarding running a search in relativity concerning helper hours.	\$195	0.1	\$19.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
		Run search in database regarding same and provide link to C. Healey.	\$195	0.2		\$39.00								
		Memorandum regarding Trial Prep session and to-do list.	\$895	1.8		\$1,611.00								
		Draft jury instructions and verdict form.	\$895	2.4		\$2,148.00	1	895.00						
		Revise jury instructions and verdict form.	\$895	3.1		\$2,774.50	1	895.00						
		Telephone conference with Attorney Erickson regarding class counsel issue.	\$895	0.2		\$179.00								
		Revise jury instruction and verdict form.	\$895	4.3		\$3,848.50	1	895.00						
		Revise jury instructions and verdict form.	\$895	4.5		\$4,027.50	1	895.00						
		Prepare correspondence to Attorney Cocchia regarding potential witness	\$895	0.1		\$89.50								
		Revise jury instructions and verdict form.	\$895	2		\$1,790.00								
		Prepare correspondence to team regarding same.	\$895	0.2		\$179.00								
		Review Defendants' supplemental discovery brief.	\$940	0.1		\$94.00								
		Prepare correspondence to team regarding trial preparation.	\$940	0.1		\$94.00								
		Telephone conference with Attorney Marks regarding trial preparation.	\$940	0.1		\$94.00								
		Prepare for discovery hearing.	\$940	0.2		\$188.00								
		Prepare for discovery hearing.	\$940	4.4		\$4,136.00								
		Review discovery tentative ruling.	\$940	0.8		\$752.00								
		Telephone conference with Attorney Umpierre regarding same.	\$940	0.4		\$376.00								
		Correspondence with Attorney Umpierre regarding discovery hearing.	\$940	0.3		\$282.00								
		Continued preparing for discovery hearing.	\$940	2		\$1,880.00								
		Prepare for discovery hearing.	\$940	1.5		\$1,410.00								
		Attend discovery hearing.	\$940	2		\$1,880.00								
		Telephone conference with Attorney Marks regarding hearing and trial preparation.	\$940	0.5		\$470.00								
		Prepare correspondence to team regarding status.	\$940	0.1		\$94.00								
		Review Attorney Umpierre's summary regarding discovery hearing.	\$940	0.1		\$94.00								
		Prepare correspondence to team regarding CLM code issue.	\$940	0.2		\$188.00								
		Prepare correspondence to Attorney Umpierre regarding discovery conference follow-up and related issues.	\$940	1		\$940.00								
		Follow-up correspondence regarding same.	\$940	0.1		\$94.00								
		Review class list.	\$940	0.1		\$94.00								
		Prepare correspondence to team regarding same.	\$940	0.2		\$188.00								
		Telephone conference with Attorney Umpierre regarding discovery front.	\$940	0.1		\$94.00								
		Prepare correspondence to team regarding trial preparation issues.	\$940	0.1		\$94.00								
		Prepare correspondence to team regarding trial exhibit list.	\$940	0.2		\$188.00								
		Telephone conference with Attorney Umpierre regarding discovery ruling and meet/confer.	\$940	1		\$940.00								
		Review unsealing order.	\$940	0.1		\$94.00								
		Research regarding potential appellate review of unsealing order and prepare correspondence to team regarding same.	\$940	0.2		\$188.00								
		Correspondence with team regarding trial preparation call.	\$940	0.1		\$94.00								
		Telephone conference with team regarding trial preparation.	\$940	1.6		\$1,504.00			1.6	1,504.00				

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/12/2022 Healey, Christopher J.	Revise damages exposure and prepare correspondence to team regarding same.	\$940	1		\$940.00									
	1/12/2022 Healey, Christopher J.	Review and respond to Attorney Umpierre regarding open discovery issues.	\$940	0.5		\$470.00									
	1/13/2022 Healey, Christopher J.	Correspondence regarding discovery meet and confer issues.	\$940	0.2		\$188.00									
	1/13/2022 Healey, Christopher J.	Review deposition transcripts and prepare correspondence regarding 10 deposition limit.	\$940	0.2		\$188.00									
	1/13/2022 Healey, Christopher J.	Revise deposition exhibit list.	\$940	0.2		\$188.00									
	1/13/2022 Healey, Christopher J.	Review court order regarding class notice.	\$940	0.2		\$188.00									
	1/13/2022 Healey, Christopher J.	Telephone conference with Tracy Myrick regarding deposition transcripts and exhibits.	\$940	0.5		\$470.00									
	1/13/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding resident files issue.	\$940	0.2		\$188.00									
	1/13/2022 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding Belaire-West language regarding class notice.	\$940	0.3		\$282.00									
	1/13/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery meet and confer.	\$940	0.3		\$282.00									
	1/13/2022 Healey, Christopher J.	Draft memorandum regarding trial preparation meeting and to-do.	\$940	0.5		\$470.00									
	1/14/2022 Healey, Christopher J.	Prepare correspondence regarding Yardi assessor issue.	\$940	0.1		\$94.00									
	1/14/2022 Healey, Christopher J.	Prepare correspondence regarding discovery meet and confer and joint statement.	\$940	0.2		\$188.00									
	1/14/2022 Healey, Christopher J.	Review and revise joint statement regarding pending discovery issues.	\$940	1.6		\$1,504.00									
	1/14/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$940	0.3		\$282.00									
	1/14/2022 Healey, Christopher J.	Further revisions to joint statement.	\$940	0.1		\$94.00									
	1/14/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding joint statement issues.	\$940	0.3		\$282.00									
	1/18/2022 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding joint statement.	\$940	0.1		\$94.00									
	1/18/2022 Healey, Christopher J.	Follow-up correspondence regarding to-do assignments.	\$940	0.1		\$94.00									
	1/18/2022 Healey, Christopher J.	Correspondence with Attorney Wallace regarding witness issues.	\$940	0.1		\$94.00									
	1/18/2022 Healey, Christopher J.	Correspondence regarding class notice issues.	\$940	0.3		\$282.00									
	1/18/2022 Healey, Christopher J.	Review court supplemental order regarding class notice.	\$940	0.1		\$94.00									
	1/18/2022 Healey, Christopher J.	Review Sunrise financial records.	\$940	0.1		\$94.00									
	1/18/2022 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding Sunrise trial exposure.	\$940	0.2		\$188.00									
	1/18/2022 Healey, Christopher J.	Telephone conference with Julie Green (CPT) regarding class notice issues.	\$940	0.1		\$94.00									
	1/18/2022 Healey, Christopher J.	Review and revise joint statement regarding discovery issues.	\$940	2		\$1,880.00									
	1/18/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$940	0.4		\$376.00									
	1/18/2022 Healey, Christopher J.	Correspondence regarding class notice and court orders regarding same.	\$940	0.2		\$188.00									
	1/18/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding joint statement.	\$940	0.1		\$94.00									
	1/19/2022 Healey, Christopher J.	Correspondence with CPT regarding class notice.	\$940	0.1		\$94.00									
	1/19/2022 Healey, Christopher J.	Telephone conference with CPT regarding class notice issues.	\$940	0.5		\$470.00									
	1/19/2022 Healey, Christopher J.	Prepare for CPT call.	\$940	0.2		\$188.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/19/2022 Healey, Christopher J.	Revise class notice to address court orders.	\$940	0.3		\$282.00								
	1/19/2022 Healey, Christopher J.	Correspondence with CPT regarding class notice issues.	\$940	0.2		\$188.00								
	1/19/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding case schedule.	\$940	0.2		\$188.00								
	1/19/2022 Healey, Christopher J.	Correspondence regarding Sunrise's proposal on case schedule.	\$940	0.2		\$188.00								
	1/19/2022 Healey, Christopher J.	Draft email regarding Slichta deposition.	\$940	0.1		\$94.00								
	1/19/2022 Healey, Christopher J.	Outline potential motion regarding Slichta deposition.	\$940	0.1		\$94.00								
	1/19/2022 Healey, Christopher J.	Prepare correspondence regarding DLS analysis and timing.	\$940	0.2		\$188.00								
	1/20/2022 Healey, Christopher J.	Review correspondence from Sunrise regarding case schedule.	\$940	0.1		\$94.00								
	1/20/2022 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding Slichta deposition issue.	\$940	0.1		\$94.00								
	1/20/2022 Healey, Christopher J.	Office conference regarding trial preparation website.	\$940	0.2		\$188.00								
	1/20/2022 Healey, Christopher J.	Prepare correspondence regarding Winkler and Slichta departures.	\$940	0.2		\$188.00								
	1/20/2022 Healey, Christopher J.	Prepare correspondence regarding motion to reopen fact discovery.	\$940	0.1		\$94.00								
	1/20/2022 Valero, Carmen A.	Research and retrieve CACD exemplars for motions amending the case schedule and reopening fact discovery, for C. Healey.	\$360	1		\$360.00								
	1/21/2022 Healey, Christopher J.	Correspondence regarding motion regarding Slichta deposition.	\$940	0.2		\$188.00								
	1/21/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery meet and confer.	\$940	0.2		\$188.00								
	1/21/2022 Healey, Christopher J.	Revise Sunrise's proposed case schedule stipulation.	\$940	0.2		\$188.00								
	1/21/2022 Healey, Christopher J.	Draft correspondence to Sunrise's counsel regarding same.	\$940	0.3		\$282.00								
	1/21/2022 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$940	0.1		\$94.00								
	1/21/2022 Healey, Christopher J.	Outline revisions to case schedule stipulation.	\$940	0.3		\$282.00								
	1/21/2022 Healey, Christopher J.	Prepare correspondence regarding same.	\$940	0.2		\$188.00								
	1/24/2022 Healey, Christopher J.	Correspondence regarding case schedule stipulation.	\$940	0.1		\$94.00								
	1/24/2022 Healey, Christopher J.	Correspondence with CPT regarding supporting declaration.	\$940	0.1		\$94.00								
	1/24/2022 Healey, Christopher J.	Review and revise CPT supporting declaration on class notice issues.	\$940	1.2		\$1,128.00								
	1/24/2022 Healey, Christopher J.	Correspondence with CPT regarding same.	\$940	0.1		\$94.00								
	1/24/2022 Healey, Christopher J.	Review Sunrise letter regarding class list.	\$940	0.2		\$188.00								
	1/24/2022 Healey, Christopher J.	Research and draft response regarding same.	\$940	1.2		\$1,128.00								
	1/24/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding case schedule stipulation and other issues.	\$940	0.3		\$282.00								
	1/24/2022 Healey, Christopher J.	Telephone conference with Attorney Marks regarding case schedule.	\$940	0.2		\$188.00								
	1/24/2022 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding case schedule.	\$940	0.2		\$188.00								
	1/24/2022 Healey, Christopher J.	Draft revisions to case schedule stipulation.	\$940	0.4		\$376.00								
	1/24/2022 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$940	0.5		\$470.00								
	1/24/2022 Healey, Christopher J.	Correspondence with CPT regarding declaration.	\$940	0.1		\$94.00								
	1/25/2022 Healey, Christopher J.	Correspondence regarding class notice issues.	\$940	0.1		\$94.00								
	1/25/2022 Healey, Christopher J.	Prepare correspondence regarding Slichta motion.	\$940	0.1		\$94.00								
	1/25/2022 Healey, Christopher J.	Correspondence with CPT regarding class notice.	\$940	0.2		\$188.00								
	1/25/2022 Healey, Christopher J.	Draft revision to case stipulation.	\$940	2		\$1,880.00								
	1/25/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding class notice and case stipulation.	\$940	0.3		\$282.00								
	1/25/2022 Healey, Christopher J.	Review and revise joint statement regarding class notice.	\$940	1.5		\$1,410.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/25/2022 Healey, Christopher J.	Review and revise proposed order regarding class notice.	\$940	0.5		\$470.00									
	1/26/2022 Healey, Christopher J.	Review Sunrise's position regarding case schedule.	\$940	0.1		\$94.00									
	1/26/2022 Healey, Christopher J.	Review file regarding prior case scheduling orders.	\$940	0.3		\$282.00									
	1/26/2022 Healey, Christopher J.	Review and revise position statement regarding class notice.	\$940	0.1		\$94.00									
	1/26/2022 Healey, Christopher J.	Prepare correspondence to team regarding case schedule issues.	\$940	0.2		\$188.00									
	1/26/2022 Healey, Christopher J.	Further file review regarding case scheduling history.	\$940	0.5		\$470.00									
	1/26/2022 Healey, Christopher J.	Outline response to Gibson's email regarding case schedule.	\$940	2		\$1,880.00		1.4	1,316.00						
	1/26/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding class notice and case schedule issues.	\$940	0.3		\$282.00									
	1/26/2022 Healey, Christopher J.	Gather CPT communications and sent to Attorney Gorman, per Sunrise's request.	\$940	0.2		\$188.00									
	1/26/2022 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding Slichta deposition motion.	\$940	0.5		\$470.00									
	1/26/2022 Healey, Christopher J.	Review and revise joint statement insert regarding class notice.	\$940	0.2		\$188.00									
	1/26/2022 Healey, Christopher J.	Correspondence with Attorney Schwartz regarding case schedule issue.	\$940	0.1		\$94.00									
	1/26/2022 Healey, Christopher J.	Telephone conferences with Attorney Umpierre regarding class notice statement.	\$940	0.3		\$282.00									
	1/26/2022 Healey, Christopher J.	Review and revise joint statement language and prepare correspondence to counsel regarding same.	\$940	0.2		\$188.00									
	1/26/2022 Healey, Christopher J.	Review Sunrise's response to joint statement language.	\$940	0.2		\$188.00									
	1/26/2022 Healey, Christopher J.	Draft response regarding same.	\$940	0.5		\$470.00									
	1/26/2022 Healey, Christopher J.	Further telephone conferences with Attorney Umpierre regarding same.	\$940	0.2		\$188.00									
	1/26/2022 Healey, Christopher J.	Follow-up correspondence regarding joint statement regarding class issues.	\$940	0.1		\$94.00									
	1/26/2022 Healey, Christopher J.	Prepare for meet and confer with Attorney Schwartz regarding case schedule.	\$940	0.2		\$188.00									
	1/27/2022 Healey, Christopher J.	Prepare for Schwartz call regarding case schedule.	\$940	0.1		\$94.00									
	1/27/2022 Healey, Christopher J.	Outline argument regarding joint statement.	\$940	0.2		\$188.00									
	1/27/2022 Healey, Christopher J.	Telephone conference with Attorney Schwartz regarding case schedule stipulation.	\$940	0.3		\$282.00									
	1/27/2022 Healey, Christopher J.	Revise stipulation.	\$940	0.6		\$564.00									
	1/27/2022 Healey, Christopher J.	Prepare correspondence to team regarding compromise on case schedule stipulation.	\$940	0.4		\$376.00									
	1/27/2022 Healey, Christopher J.	Further revisions to case schedule stipulation.	\$940	0.5		\$470.00									
	1/27/2022 Healey, Christopher J.	Follow-up correspondence regarding same.	\$940	0.5		\$470.00									
	1/27/2022 Healey, Christopher J.	Review and revise joint statement regarding disputed class list issues.	\$940	1		\$940.00									
	1/27/2022 Healey, Christopher J.	Further revisions to joint statement regarding class list.	\$940	0.2		\$188.00									
	1/27/2022 Healey, Christopher J.	Review and revise supporting Umpierre declaration regarding case schedule stipulation.	\$940	0.2		\$188.00									
	1/27/2022 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding financial data.	\$940	0.2		\$188.00									
	1/27/2022 Howard, Kathryn M.	Email exchanges regarding cite checking the Joint Statement Regarding Class.	\$325	0.1		\$32.50									
	1/27/2022 Howard, Kathryn M.	Receive and brief review of Joint Statement	\$325	0.2		\$65.00									
	1/27/2022 Howard, Kathryn M.	Review cited caselaw and cite check each.	\$325	0.3		\$97.50									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/27/2022 Howard, Kathryn M.	Review cases referencing negative treatment.	\$325	0.2		\$65.00								
	1/27/2022 Howard, Kathryn M.	Review and revise Joint Statement.	\$325	0.3		\$97.50								
	1/27/2022 Howard, Kathryn M.	Read cases with negative treatment.	\$325	0.2		\$65.00								
	1/27/2022 Howard, Kathryn M.	Finalize Joint Statement.	\$325	0.1		\$32.50								
	1/27/2022 Howard, Kathryn M.	Prepare email to C. Healey regarding same.	\$325	0.1		\$32.50								
	1/27/2022 Howard, Kathryn M.	Followup email exchanges with C. Healey regarding same.	\$325	0.1		\$32.50								
	1/31/2022 Healey, Christopher J.	Review and respond to Sunrise's proposal regarding 500 admission agreements.	\$940	0.1		\$94.00								
	1/31/2022 Healey, Christopher J.	Prepare correspondence to team regarding Slichta deposition motion.	\$940	0.1		\$94.00								
	1/31/2022 Healey, Christopher J.	Review Attorney Marks' correspondence regarding damages calculations.	\$940	0.1		\$94.00								
	2/1/2022 Healey, Christopher J.	Correspondence regarding Slichta deposition motion.	\$940	0.1		\$94.00								
	2/1/2022 Healey, Christopher J.	Revise and review Slichta deposition motion.	\$940	1.4		\$1,316.00								
	2/1/2022 Healey, Christopher J.	Review Attorney Umpierre's declaration.	\$940	0.1		\$94.00								
	2/1/2022 Healey, Christopher J.	Follow-up correspondence regarding Slichta deposition motion.	\$940	0.1		\$94.00								
	2/1/2022 Healey, Christopher J.	Telephone conference with team regarding Slichta deposition motion.	\$940	0.8		\$752.00			0.8	752.00				
	2/1/2022 Healey, Christopher J.	Draft further revisions regarding same.	\$940	0.5		\$470.00								
	2/1/2022 Healey, Christopher J.	Review and revise final draft of motion.	\$940	1		\$940.00								
	2/1/2022 Healey, Christopher J.	Telephone conferences with Attorney Johnson regarding same.	\$940	0.4		\$376.00								
	2/2/2022 Healey, Christopher J.	Outline to-do tasks.	\$940	0.1		\$94.00								
	2/2/2022 Healey, Christopher J.	Correspondence regarding Sunrise motion for summary judgment.	\$940	0.1		\$94.00								
	2/2/2022 Healey, Christopher J.	Review Sunrise's motion for summary judgment.	\$940	0.3		\$282.00								
	2/2/2022 Healey, Christopher J.	Outline key cases in motion for summary judgment.	\$940	1.5		\$1,410.00								
	2/3/2022 Healey, Christopher J.	Prepare draft correspondence to Judge Guilford regarding pending discovery motion.	\$940	0.1		\$94.00								
	2/3/2022 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$940	0.1		\$94.00								
	2/3/2022 Healey, Christopher J.	Outline motion for summary judgment opposition.	\$940	0.5		\$470.00								
	2/3/2022 Healey, Christopher J.	Prepare correspondence to team regarding case status and team call.	\$940	0.2		\$188.00								
	2/3/2022 Healey, Christopher J.	Correspondence regarding summary judgment opposition and research assignments regarding same.	\$940	0.3		\$282.00								
	2/3/2022 Healey, Christopher J.	Correspondence regarding Warren stipulation.	\$940	0.1		\$94.00								
	2/3/2022 Healey, Christopher J.	Follow-up correspondence regarding same.	\$940	0.1		\$94.00								
	2/3/2022 Healey, Christopher J.	Outline opposition to Sunrise motion for summary judgment.	\$940	0.8		\$752.00								
	2/3/2022 Valero, Carmen A.	Research and retrieve CACD CLRA exemplars of oppositions by class plaintiffs to defendants' motion for summary judgment, for C. Healey.	\$360	1		\$360.00								
	2/4/2022 Healey, Christopher J.	Correspondence regarding Warren stipulation.	\$940	0.1		\$94.00								
	2/4/2022 Healey, Christopher J.	Outline opposition to motion for summary judgment, with research and analysis re same	\$940	3.1		\$2,914.00			1	940.00				
	2/4/2022 Valero, Carmen A.	Research cases addressing evidence required to show triable issue of fact with respect to classwide injury in context of summary judgment motion, for C. Healey.	\$360	1		\$360.00								
	2/7/2022 Healey, Christopher J.	Draft motion for summary judgment opposition.	\$940	0.5		\$470.00								
	2/7/2022 Healey, Christopher J.	Review court order regarding case schedule.	\$940	0.1		\$94.00								
	2/7/2022 Healey, Christopher J.	Correspondence regarding updated calendar.	\$940	0.1		\$94.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	2/7/2022 Healey, Christopher J.	Outline to-do list.	\$940	0.5		\$470.00									
	2/7/2022 Healey, Christopher J.	Office conference regarding Dentons Direct.	\$940	0.1		\$94.00									
	2/7/2022 Healey, Christopher J.	Review and analyze cases regarding motion for summary judgment opposition.	\$940	0.3		\$282.00									
	2/7/2022 Healey, Christopher J.	Prepare agenda for team call.	\$940	0.3		\$282.00									
	2/8/2022 Healey, Christopher J.	Review Defendants' correspondence to Discovery Master.	\$940	0.1		\$94.00									
	2/8/2022 Healey, Christopher J.	Prepare correspondence regarding Dentons Direct link.	\$940	0.1		\$94.00									
	2/8/2022 Healey, Christopher J.	Office conference regarding Dentons Direct website and key materials.	\$940	0.3		\$282.00									
	2/8/2022 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding meet and confer.	\$940	0.1		\$94.00									
	2/8/2022 Healey, Christopher J.	Review correspondence.	\$940	0.1		\$94.00									
	2/8/2022 Healey, Christopher J.	Outline to-do list.	\$940	0.1		\$94.00									
	2/8/2022 Myrick, Tracy R.	Download Sunrise Senior Living LLC Sealed Declaration in Support of Application to file Document Under Seal via drop box and provide to caseteam via email per their request.	\$195	0.3		\$58.50									
	2/9/2022 Ryan, Teresa M.	Retrieve information in preparation for upload to Dentons Direct.	\$415	1.1		\$456.50		1.1	456.5						
	2/9/2022 Ryan, Teresa M.	Emails/telephone conference with C. Healey re documents upload to Dentons Direct.	\$415	0.1		\$41.50		0.1	41.5						
	2/9/2022 Healey, Christopher J.	Telephone conference with Attorney Yarnall regarding motion for summary judgment opposition and trial witnesses.	\$940	0.3		\$282.00									
	2/9/2022 Healey, Christopher J.	Review and outline motion for summary judgment response arguments.	\$940	0.2		\$188.00									
	2/9/2022 Healey, Christopher J.	Research and analysis regarding Sunrise summary judgment arguments.	\$940	2.2		\$2,068.00									
	2/9/2022 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding expert testimony.	\$940	0.1		\$94.00									
	2/9/2022 Healey, Christopher J.	Prepare correspondence to team regarding Dentons Direct.	\$940	0.2		\$188.00									
	2/10/2022 Healey, Christopher J.	Review Defendants' summary judgment cases and arguments.	\$940	1.6		\$1,504.00									
	2/10/2022 Healey, Christopher J.	Prepare for team call.	\$940	0.2		\$188.00									
	2/10/2022 Healey, Christopher J.	Telephone conference with team regarding case status, discovery and trial preparation.	\$940	0.8		\$752.00				0.8	752.00				
	2/10/2022 Healey, Christopher J.	Telephone conferences with Attorney Umpierre regarding class notice issue.	\$940	0.3		\$282.00									
	2/11/2022 Healey, Christopher J.	Draft statement to declarants regarding rights to pursue individual actions	\$940	1		\$940.00		0.5	470.00						
	2/11/2022 Healey, Christopher J.	Prepare to-do list from team call.	\$940	0.5		\$470.00									
	2/14/2022 Healey, Christopher J.	Correspondence with Attorney Marks regarding case schedule.	\$940	0.1		\$94.00									
	2/14/2022 Healey, Christopher J.	Review file regarding expert costs.	\$940	0.1		\$94.00									
	2/14/2022 Healey, Christopher J.	Draft correspondence to discovery referee regarding status.	\$940	0.5		\$470.00									
	2/14/2022 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$940	0.1		\$94.00									
	2/14/2022 Healey, Christopher J.	Outline argument regarding summary judgment motion.	\$940	1.2		\$1,128.00									
	2/14/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding case status and discovery issues.	\$940	0.3		\$282.00									
	2/14/2022 Healey, Christopher J.	Prepare correspondence to team regarding expert costs.	\$940	0.5		\$470.00									
	2/14/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Discovery Master ruling.	\$940	0.1		\$94.00									
	2/23/2022 Healey, Christopher J.	Review Discovery Master recommendation.	\$940	0.2		\$188.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	2/23/2022 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding ProModel protected files info.	\$940	0.3									
	2/23/2022 Healey, Christopher J.	Draft correspondence to team regarding Discovery Master.	\$940	0.2									
	2/23/2022 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding billed/collections documents.	\$940	0.1									
	2/24/2022 Healey, Christopher J.	Review and comment on meet and confer statement.	\$940	0.3									
	2/24/2022 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$940	0.3									
	2/24/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre rearding discovery issues.	\$940	0.3									
	2/24/2022 Healey, Christopher J.	Prepare correspondence to team regarding position on discovery ruling.	\$940	0.5									
	2/24/2022 Healey, Christopher J.	Correspondence regarding cost issues.	\$940	0.2									
	2/28/2022 Healey, Christopher J.	Correspondence regarding ProModel package files.	\$940	0.1									
	2/28/2022 Healey, Christopher J.	Review Wallace memo regarding A/C relationship with class.	\$940	0.2									
	2/28/2022 Healey, Christopher J.	Research regarding same.	\$940	0.2									
	2/28/2022 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$940	0.2									
	2/28/2022 Healey, Christopher J.	Outline responses to summary judgment arguments.	\$940	1.5									
	3/1/2022 Healey, Christopher J.	Review and revise proposal regarding MedModel files.	\$940	0.3									
	3/1/2022 Healey, Christopher J.	Review and comment regarding meet and confer email.	\$940	0.2									
	3/3/2022 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding statusand discovery.	\$940	0.2									
	3/4/2022 Healey, Christopher J.	Review and revise correspondence from Attorney Yarnall regarding class member outreach.	\$940	1									
	3/4/2022 Healey, Christopher J.	Review and comment on notice regarding tolling issue.	\$940	0.2									
	3/4/2022 Healey, Christopher J.	Review Sunrise's response regarding mod file issue.	\$940	0.1									
	3/4/2022 Healey, Christopher J.	Prepare correspondence to team regarding discovery of witness statements.	\$940	0.4									
	3/7/2022 Healey, Christopher J.	Correspondence to team regarding mod file issue.	\$940	0.2									
	3/7/2022 Healey, Christopher J.	Review Sunrise statement regarding assessment production.	\$940	0.1									
	3/7/2022 Healey, Christopher J.	Outline summary judgment opposition arguments.	\$940	0.6									
	3/7/2022 Healey, Christopher J.	Review court order regarding Judge Staton courtroom change.	\$940	0.1									
	3/7/2022 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$940	0.1									
	3/7/2022 Healey, Christopher J.	Correspondence from Attorney Marks regarding mod file production.	\$940	0.1									
	3/8/2022 Healey, Christopher J.	Review and revise correspondence regarding mod files.	\$940	0.2									
	3/9/2022 Healey, Christopher J.	Review correspondence regarding happy camper issue.	\$940	0.1									
	3/9/2022 Healey, Christopher J.	Prepare correspondence to team regarding expert opinion on risk of not receiving promised services.	\$940	0.2									
	3/10/2022 Healey, Christopher J.	Review Sunrise's email regarding MOD file issue.	\$940	0.1									
	3/10/2022 Healey, Christopher J.	Review Attorney Umpierre's correspondence regarding open discovery issues.	\$940	0.2									
	3/10/2022 Healey, Christopher J.	Analysis regarding same.	\$940	0.2									
	3/10/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery issues.	\$940	0.3									
	3/11/2022 Healey, Christopher J.	Correspondence regarding class member interviews.	\$940	0.1									
	3/11/2022 Healey, Christopher J.	Review and comment on correspondence regarding class member communications issue.	\$940	0.2									
	3/14/2022 Healey, Christopher J.	Review correspondence regarding happy camper follow-up.	\$940	0.1									
	3/14/2022 Healey, Christopher J.	Prepare correspondence to team regarding potential questions.	\$940	0.5									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>				
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	
	3/14/2022 Healey, Christopher J.	Follow-up correspondence regarding same.	\$940	0.1		\$94.00									
	3/15/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding mod file discovery.	\$940	0.2		\$188.00									
	3/15/2022 Healey, Christopher J.	Review correspondence regarding class member contacts.	\$940	0.1		\$94.00									
	3/17/2022 Healey, Christopher J.	Outline opposition arguments to motion for summary judgment. Review and revise meet and confer correspondence regarding mod files.	\$940	1.7		\$1,598.00									
	3/21/2022 Healey, Christopher J.	Review Gibson email regarding mod files.	\$940	0.3		\$282.00									
	3/21/2022 Healey, Christopher J.	Correspondence regarding mod file discovery.	\$940	0.1		\$94.00									
	3/22/2022 Healey, Christopher J.	Outline motion to summary judgment opposition.	\$940	1		\$940.00									
	3/22/2022 Healey, Christopher J.	Correspondence regarding class member interviews.	\$940	0.1		\$94.00									
	3/25/2022 Healey, Christopher J.	Review court order regarding class notice.	\$940	0.1		\$94.00									
	3/28/2022 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$940	0.1		\$94.00									
	3/28/2022 Healey, Christopher J.	Review order regarding form of class notice.	\$940	0.1		\$94.00									
	3/28/2022 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding same.	\$940	0.1		\$94.00									
	3/28/2022 Healey, Christopher J.	Review follow-up correspondence with CPT regarding class notice.	\$940	0.1		\$94.00									
	3/28/2022 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding assessment	\$940	0.10		\$94.00									
	3/28/2022 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding discovery schedu	\$940	0.20		\$188.00									
	3/28/2022 Healey, Christopher J.	Draft status report to team.	\$940	0.60		\$564.00									
	3/29/2022 Healey, Christopher J.	Review and revise correspondence to Sunrise regarding class list.	\$940	0.1		\$94.00									
	3/29/2022 Healey, Christopher J.	Review correspondence regarding class notice.	\$940	0.1		\$94.00									
	3/29/2022 Healey, Christopher J.	Correspondence with Attorney Marks regarding witness interview.	\$940	0.1		\$94.00									
	3/29/2022 Healey, Christopher J.	Prepare correspondence regarding potential questions.	\$940	0.3		\$282.00									
	3/29/2022 Healey, Christopher J.	Further questions regarding interviews.	\$940	0.2		\$188.00									
	3/29/2022 Healey, Christopher J.	Review correspondence regarding class notice issues.	\$940	0.1		\$94.00									
	3/29/2022 Healey, Christopher J.	Review Attorney Marks' report on witness interview.	\$940	0.1		\$94.00									
	3/30/2022 Healey, Christopher J.	Review and respond to Attorney Marks' question regarding personnel files.	\$940	0.2		\$188.00									
	3/30/2022 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding case schedule issues.	\$940	0.1		\$94.00									
	3/30/2022 Healey, Christopher J.	Review correspondence regarding assessment data.	\$940	0.1		\$94.00									
	3/31/2022 Healey, Christopher J.	Review Sunrise's position regarding assessment data.	\$940	0.1		\$94.00									
	3/31/2022 Healey, Christopher J.	Outline options regarding same.	\$940	0.1		\$94.00									
	3/31/2022 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$940	0.1		\$94.00									
	3/31/2022 Healey, Christopher J.	Review Attorney Marks' email regarding excluded fields from assessment data.	\$940	0.1		\$94.00									
	3/31/2022 Healey, Christopher J.	Response and proposed arguments regarding same.	\$940	0.2		\$188.00									
	3/31/2022 Healey, Christopher J.	Review and revise position on Sunrise's refusal to provide LocationBed info.	\$940	0.5		\$470.00									
	3/31/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$940	0.2		\$188.00									
	3/31/2022 Healey, Christopher J.	Follow-up correpondence regarding assessment data issues.	\$940	0.1		\$94.00									
	4/1/2022 Healey, Christopher J.	Telephone conferences with Attorney Umpierre regarding absence/move-out data and approach regarding same.	\$940	0.4		\$376.00									
	4/1/2022 Healey, Christopher J.	Telephone conference with Attorney Marks regarding discovery status and absence data approach.	\$940	0.2		\$188.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/1/2022 Healey, Christopher J.	Review and revise meet and confer correspondence regarding assessment data.	\$940	0.3		\$282.00								
	4/1/2022 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding trial preparation.	\$940	0.1		\$94.00								
	4/1/2022 Healey, Christopher J.	Review file regarding potential witnesses.	\$940	0.2		\$188.00								
	4/1/2022 Healey, Christopher J.	Review draft "key documents" list.	\$940	0.1		\$94.00								
	4/1/2022 Healey, Christopher J.	Analysis regarding key documents.	\$940	0.2		\$188.00								
	4/1/2022 Healey, Christopher J.	Prepare correspondence regarding research on personally identifying info issue.	\$940	0.3		\$282.00								
	4/1/2022 Healey, Christopher J.	Review Attorney Schwartz's email regarding stay stipulation.	\$940	0.1		\$94.00								
	4/1/2022 Healey, Christopher J.	Review Ninth Circuit order regarding Rule 23(f) petition.	\$940	0.1		\$94.00								
	4/1/2022 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$940	0.8		\$752.00								
	4/1/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Rule 23(f) order.	\$940	0.2		\$188.00								
	4/2/2022 Healey, Christopher J.	Outline position regarding stay and related issues.	\$940	0.2		\$188.00								
	4/2/2022 Healey, Christopher J.	Correspondence with Attorney Wallace regarding stay approach.	\$940	0.4		\$376.00								
	4/2/2022 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$940	0.2		\$188.00								
	4/4/2022 Healey, Christopher J.	Prepare correspondence regarding stay research.	\$940	0.2		\$188.00								
	4/4/2022 Healey, Christopher J.	Draft response to Sunrise regarding stay request.	\$940	0.3		\$282.00								
	4/4/2022 Healey, Christopher J.	Review Attorney Yarnall's correspondence regarding class member outreach.	\$940	0.1		\$94.00								
	4/4/2022 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding standing issue and Ninth Circuit ruling.	\$940	0.5		\$470.00								
	4/4/2022 Healey, Christopher J.	Prepare correspondence to file regarding standing argument.	\$940	0.2		\$188.00								
	4/4/2022 Healey, Christopher J.	Research regarding Ninth Circuit judges.	\$940	0.2		\$188.00								
	4/4/2022 Healey, Christopher J.	Correspondence with Attorney Schwartz regarding stay issue.	\$940	0.1		\$94.00								
	4/4/2022 Healey, Christopher J.	Prepare correspondence to team regarding Mod file discovery.	\$940	0.1		\$94.00								
	4/4/2022 Healey, Christopher J.	Review research regarding stay after Rule 23(f).	\$940	0.2		\$188.00								
	4/4/2022 Healey, Christopher J.	Analysis regarding stay decisions.	\$940	0.3		\$282.00								
	4/4/2022 Healey, Christopher J.	Prepare correspondence regarding follow-up research.	\$940	0.2		\$188.00								
	4/4/2022 Healey, Christopher J.	Outline response arguments on stay issue.	\$940	0.2		\$188.00								
	4/4/2022 Maddry, Mica	Conduct search for Circuit cases that address stay requests after a Rule 23(f) petition is granted for Christopher Healey.	\$350	2.5		\$875.00								
	4/5/2022 Healey, Christopher J.	Prepare correspondence regarding Mod file production.	\$940	0.2		\$188.00								
	4/5/2022 Healey, Christopher J.	Review Attorney Schwartz's email regarding stay stipulation.	\$940	0.1		\$94.00								
	4/5/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Mod file and stay proposal.	\$940	0.2		\$188.00								
	4/5/2022 Healey, Christopher J.	Respond to Attorney Schwartz regarding stay proposal.	\$940	0.2		\$188.00								
	4/5/2022 Healey, Christopher J.	Review stay cases cited by Sunrise.	\$940	0.5		\$470.00								
	4/5/2022 Healey, Christopher J.	Review Attorney Umpierre's email regarding discovery categories.	\$940	0.1		\$94.00								
	4/6/2022 Healey, Christopher J.	Review Ninth Circuit scheduling order.	\$940	0.1		\$94.00								
	4/6/2022 Healey, Christopher J.	Prepare for Gibson call regarding stay issue.	\$940	0.3		\$282.00								
	4/6/2022 Healey, Christopher J.	Telephone conference with Attorney Schwartz regarding stay issue.	\$940	0.2		\$188.00								
	4/6/2022 Healey, Christopher J.	Research regarding Rule 23(f) petitions.	\$940	0.2		\$188.00								
	4/6/2022 Healey, Christopher J.	Telephone conference with Attorney Drachler regarding appellate counsel issues.	\$940	0.2		\$188.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>	<u>Fees</u>	<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>		
	4/6/2022 Healey, Christopher J.	Research regarding status of Olean en banc petition.	\$940	0.5	\$470.00										
	4/6/2022 Healey, Christopher J.	Prepare correspondence to team regarding meet and confer regarding stay discovery.	\$940	0.2	\$188.00										
	4/6/2022 Healey, Christopher J.	Review Sunrise's proposal regarding stay issue.	\$940	0.2	\$188.00										
	4/6/2022 Healey, Christopher J.	Telephone conference with team regarding same.	\$940	0.5	\$470.00					0.5	470.00				
	4/6/2022 Healey, Christopher J.	Draft response to Sunrise's proposal.	\$940	0.3	\$282.00										
	4/6/2022 Healey, Christopher J.	Review Attorney Schwartz's email regarding ex parte application.	\$940	0.2	\$188.00										
	4/6/2022 Healey, Christopher J.	Review ex parte application.	\$940	0.3	\$282.00										
	4/6/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$940	0.2	\$188.00										
	4/6/2022 Healey, Christopher J.	Outline Attorney Umpierre declaration in support of ex parte opposition.	\$940	0.3	\$282.00										
	4/6/2022 Healey, Christopher J.	Draft opposition to ex parte application.	\$940	2.5	\$2,350.00										
	4/6/2022 Valero, Carmen A.	Research treatises, decisions or law reviews citing the Lammon article on class-action appeals, for C. Healey.	\$360	0.3	\$108.00										
	4/7/2022 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding stay opposition.	\$940	0.2	\$188.00										
	4/7/2022 Healey, Christopher J.	Outline opposition argument.	\$940	0.2	\$188.00										
	4/7/2022 Healey, Christopher J.	Draft opposition to stay ex parte.	\$940	5.8	\$5,452.00			2.9	2,726.00						
	4/7/2022 Healey, Christopher J.	Review and revise Attorney Umpierre declaration.	\$940	0.8	\$752.00										
	4/7/2022 Healey, Christopher J.	Telephone conferences with Attorney Umpierre regarding brief.	\$940	0.3	\$282.00										
	4/7/2022 Healey, Christopher J.	Review cases regarding injunctive relief point.	\$940	0.5	\$470.00										
	4/7/2022 Healey, Christopher J.	Draft insert regarding same.	\$940	0.2	\$188.00										
	4/7/2022 Howard, Kathryn M.	Review Plaintiffs' Opposition to Ex Parte Application for Order Staying Litigation; research cited cases revised Opposition.	\$325	1.5	\$487.50										
	4/7/2022 Howard, Kathryn M.	Finalize same.	\$325	0.1	\$32.50										
	4/7/2022 Howard, Kathryn M.	Prepare email to C. Healey regarding revisions to legal citations.	\$325	0.1	\$32.50										
	4/8/2022 Healey, Christopher J.	Correspondence with Attorney Wallace regarding Olean opinion.	\$940	0.2	\$188.00										
	4/8/2022 Healey, Christopher J.	Review Olean opinion.	\$940	0.5	\$470.00										
	4/8/2022 Healey, Christopher J.	Prepare correspondence to team regarding Olean en banc decision.	\$940	0.2	\$188.00										
	4/8/2022 Healey, Christopher J.	Prepare correspondence regarding class member outreach.	\$940	0.1	\$94.00										
	4/8/2022 Healey, Christopher J.	Outline to-do issues.	\$940	0.1	\$94.00										
	4/9/2022 Healey, Christopher J.	Outline analysis of Olean en banc decision.	\$940	0.3	\$282.00										
	4/11/2022 Healey, Christopher J.	Review Attorney Schwartz's email regarding class notice.	\$940	0.1	\$94.00										
	4/11/2022 Healey, Christopher J.	Review Olean decision.	\$940	0.9	\$846.00										
	4/11/2022 Healey, Christopher J.	Status report on Olean decision.	\$940	0.3	\$282.00										
	4/12/2022 Healey, Christopher J.	Analysis of Olean decision.	\$940	1.7	\$1,598.00										
	4/12/2022 Healey, Christopher J.	Outline memorandum regarding Olean and responses to same.	\$940	2	\$1,880.00										
	4/12/2022 Healey, Christopher J.	Review court order regarding stay.	\$940	0.1	\$94.00										
	4/12/2022 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$940	0.1	\$94.00										
	4/12/2022 Healey, Christopher J.	Prepare to-do list regarding class member outreach.	\$940	0.1	\$94.00										
	4/14/2022 Healey, Christopher J.	Correspondence regarding potential appellate counsel.	\$940	0.1	\$94.00										
	4/15/2022 Healey, Christopher J.	Review Torres decision regarding CLRA omission theory.	\$940	0.3	\$282.00										
	4/15/2022 Healey, Christopher J.	Prepare correspondence regarding same.	\$940	0.2	\$188.00										
	4/15/2022 Healey, Christopher J.	Further outline of appellate issues.	\$940	0.3	\$282.00										
	4/18/2022 Healey, Christopher J.	Draft analysis memorandum regarding appellate issues.	\$940	2.6	\$2,444.00			0.6	564.00						
	4/19/2022 Healey, Christopher J.	Office conference regarding appellate deadlines.	\$940	0.1	\$94.00										

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>									
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Travel</u>	<u>Fees</u>		
							Hrs		Hrs		Hrs		Hrs		Hrs	
	4/19/2022 Healey, Christopher J.	Analysis regarding appellate issues.	\$940	1.3		\$1,222.00										
	4/19/2022 Healey, Christopher J.	Review Ninth Circuit order regarding assessment conference.	\$940	0.1		\$94.00										
	4/19/2022 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$940	0.1		\$94.00										
	4/20/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding appellate conference.	\$940	0.2		\$188.00										
	4/20/2022 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding appellate conference and related issues.	\$940	0.2		\$188.00										
	4/20/2022 Healey, Christopher J.	Prepare correspondence regarding witness meeting.	\$940	0.1		\$94.00										
	4/25/2022 Healey, Christopher J.	Correspondence with Attorney Erickson regarding appellate mediation and status.	\$940	0.1		\$94.00										
	4/25/2022 Healey, Christopher J.	Prepare correspondence to team regarding Ninth Circuit mediation.	\$940	0.2		\$188.00										
	4/25/2022 Healey, Christopher J.	Review and analysis regarding Sunrise's request regarding hearing transcripts.	\$940	0.2		\$188.00										
	4/25/2022 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$940	0.1		\$94.00										
	4/25/2022 Healey, Christopher J.	Correspondence with Sunrise's counsel regarding appellate transcript and issues on appeal.	\$940	0.1		\$94.00										
	4/25/2022 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding outstanding discovery.	\$940	0.1		\$94.00										
	4/26/2022 Healey, Christopher J.	Review Ninth Circuit order regarding mediation.	\$940	0.1		\$94.00										
	4/26/2022 Healey, Christopher J.	Correspondence with Attorney Wallace regarding schedule adjustment.	\$940	0.1		\$94.00										
	4/26/2022 Healey, Christopher J.	Follow-up correspondence regarding same.	\$940	0.1		\$94.00										
	4/26/2022 Healey, Christopher J.	Correspondence with Sunrise's counsel regarding transcript designation.	\$940	0.1		\$94.00										
	4/26/2022 Healey, Christopher J.	Prepare correspondence to team regarding appellate mediation status.	\$940	0.1		\$94.00										
	4/26/2022 Healey, Christopher J.	Prepare correspondence regarding trial witness issues.	\$940	0.1		\$94.00										
	4/26/2022 Healey, Christopher J.	Prepare correspondence regarding research issues for responding to Sunrise appeal.	\$940	0.2		\$188.00										
	4/27/2022 Healey, Christopher J.	Review court notice regarding transcript designation.	\$940	0.1		\$94.00										
	4/27/2022 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding briefing schedule.	\$940	0.1		\$94.00										
	4/28/2022 Healey, Christopher J.	Correspondence with Attorney Wallace regarding appellate briefing.	\$940	0.1		\$94.00										
	4/28/2022 Healey, Christopher J.	Office conference regarding deposition exhibits.	\$940	0.1		\$94.00										
	4/29/2022 Healey, Christopher J.	Prepare correspondence to team regarding to-do items.	\$940	0.7		\$658.00										
	4/29/2022 Healey, Christopher J.	Prepare correspondence to Kennedy's office regarding case status.	\$940	0.1		\$94.00										
	5/2/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding appellate briefing and related issues.	\$940	0.2		\$188.00										
	5/2/2022 Healey, Christopher J.	Telephone conference with Gibson's office regarding appellate timing.	\$940	0.2		\$188.00										
	5/2/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding same.	\$940	0.1		\$94.00										
	5/3/2022 Healey, Christopher J.	Outline Respondent's brief.	\$940	1.5		\$1,410.00										
	5/3/2022 Healey, Christopher J.	Review and comment on Sunrise's email regarding briefing schedule.	\$940	0.1		\$94.00										
	5/4/2022 Healey, Christopher J.	Outline to do issues and arguments regarding appellate brief.	\$940	0.5		\$470.00										

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	5/4/2022 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding appellate approach.	\$940	0.1		\$94.00									
	5/4/2022 Healey, Christopher J.	Research and analysis regarding appellate brief.	\$940	1.4		\$1,316.00									
	5/5/2022 Healey, Christopher J.	Office conference regarding appellate counsel issues.	\$940	0.1		\$94.00									
	5/5/2022 Healey, Christopher J.	Review research regarding CLRA provisions.	\$940	0.6		\$564.00									
	5/5/2022 Healey, Christopher J.	Outline appellate arguments.	\$940	1.5		\$1,410.00									
	5/6/2022 Healey, Christopher J.	Organize appellate background materials.	\$940	0.7		\$658.00									
	5/6/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding appellate briefing and related issues.	\$940	0.3		\$282.00									
	5/6/2022 Healey, Christopher J.	Draft appellate brief.	\$940	1.1		\$1,034.00									
	5/6/2022 Valero, Carmen A.	Research cases addressing TransUnion v Ramirez in context of consumer protection economic loss claims, for C. Healey.	\$360	1		\$360.00									
	5/7/2022 Healey, Christopher J.	Review order regarding appellate schedule.	\$940	0.1		\$94.00									
	5/7/2022 Healey, Christopher J.	Review cases regarding Section 1770(a)(10) of CLRA.	\$940	0.2		\$188.00									
	5/9/2022 Healey, Christopher J.	Research and analysis regarding appellate brief.	\$940	2.3		\$2,162.00									
	5/9/2022 Healey, Christopher J.	Review consumer cases citing TransUnion.	\$940	0.2		\$188.00									
	5/9/2022 Healey, Christopher J.	Prepare to-do list regarding appellate brief.	\$940	0.1		\$94.00									
	5/10/2022 Healey, Christopher J.	Research regarding TransUnion decision in Ninth Circuit.	\$940	0.5		\$470.00									
	5/10/2022 Healey, Christopher J.	Review Brookdale briefing on class cert issues.	\$940	0.5		\$470.00									
	5/10/2022 Healey, Christopher J.	Review Ninth Circuit cases.	\$940	0.5		\$470.00									
	5/11/2022 Healey, Christopher J.	Analysis of Sunrise's Brookdale argument regarding strategy/class cert.	\$940	1		\$940.00									
	5/11/2022 Healey, Christopher J.	Correspondence to Attorney Wallace regarding same.	\$940	0.6		\$564.00									
	5/11/2022 Healey, Christopher J.	Revise answering brief.	\$940	0.2		\$188.00									
	5/16/2022 Healey, Christopher J.	Office conference with Ms. Valero regarding TransUnion research.	\$940	0.2		\$188.00									
	5/16/2022 Healey, Christopher J.	Review appellate treatise.	\$940	0.8		\$752.00									
	5/16/2022 Healey, Christopher J.	Research regarding TransUnion precedent in Ninth Circuit.	\$940	1.3		\$1,222.00									
	5/17/2022 Healey, Christopher J.	Review Ninth Circuit cases construing TransUnion.	\$940	1.3		\$1,222.00									
	5/17/2022 Healey, Christopher J.	Analysis regarding "risk of harm" cases.	\$940	0.5		\$470.00									
	5/18/2022 Healey, Christopher J.	Research regarding TransUnion authority.	\$940	1.2		\$1,128.00									
	5/19/2022 Healey, Christopher J.	Analysis regarding appeal issues.	\$940	1		\$940.00									
	5/19/2022 Healey, Christopher J.	Review TransUnion progeny.	\$940	2.3		\$2,162.00	1.15	1,081.00							
	5/20/2022 Healey, Christopher J.	Outline analysis regarding TransUnion issue.	\$940	0.2		\$188.00									
	5/20/2022 Healey, Christopher J.	Review TransUnion progeny.	\$940	0.5		\$470.00									
	5/20/2022 Healey, Christopher J.	Review Rocket Mortgage briefing.	\$940	2.3		\$2,162.00	1.15	1,081.00							
	5/20/2022 Healey, Christopher J.	Review Maya decision.	\$940	0.6		\$564.00									
	5/23/2022 Healey, Christopher J.	Review Brookdale class certification reply brief.	\$940	0.2		\$188.00									
	5/23/2022 Healey, Christopher J.	Review TransUnion progeny decisions.	\$940	1.6		\$1,504.00									
	5/24/2022 Healey, Christopher J.	Review Maya Line of "risk of economic injury" cases.	\$940	1.9		\$1,786.00									
	5/24/2022 Healey, Christopher J.	Review TransUnion decisions.	\$940	0.5		\$470.00									
	5/25/2022 Healey, Christopher J.	Outline record cites regarding staffing considerations.	\$940	0.1		\$94.00									
	5/25/2022 Healey, Christopher J.	Review post-TransUnion decisions regarding economic loss claims and status thereof.	\$940	0.3		\$282.00									
	5/26/2022 Healey, Christopher J.	Outline arguments for appellate brief.	\$940	1.1		\$1,034.00									
	5/26/2022 Healey, Christopher J.	Draft status correspondence to team.	\$940	0.2		\$188.00									
	6/8/2022 Healey, Christopher J.	Review correspondence regarding prospective appellate counsel.	\$940	0.1		\$94.00									
	6/13/2022 Healey, Christopher J.	Review TransUnion progeny.	\$940	0.8		\$752.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	6/13/2022 Healey, Christopher J.	Draft to-do list regarding appellate brief.	\$940	0.7		\$658.00									
	6/14/2022 Healey, Christopher J.	Draft appellate to-do list.	\$940	0.7		\$658.00									
	6/14/2022 Healey, Christopher J.	Prepare correspondence to Attorney Yarnell regarding class member outreach.	\$940	0.3		\$282.00									
	6/14/2022 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding appellate briefing.	\$940	0.1		\$94.00									
	6/14/2022 Healey, Christopher J.	Review analysis of Olean and TransUnion decisions.	\$940	0.7		\$658.00									
	6/15/2022 Healey, Christopher J.	Research regarding failure to prosecute and California 5 year rule.	\$940	0.8		\$752.00									
	Healey, Christopher J.	Prepare correspondence to Ms. Valero regarding same.	\$940	0.2		\$188.00									
	6/15/2022 Healey, Christopher J.	Research regarding FRCP 41(b).	\$940	0.2		\$188.00									
	6/16/2022 Healey, Christopher J.	Correspondence regarding potential tolling issue.	\$940	0.2		\$188.00									
	6/16/2022 Healey, Christopher J.	Review cases regarding five year dismissal rule.	\$940	0.7		\$658.00									
	6/16/2022 Healey, Christopher J.	Prepare correspondence regarding trial team.	\$940	0.1		\$94.00									
	6/16/2022 Valero, Carmen A.	Research applicability of the 5-year rule after a remand, for C. Healey.	\$360	2		\$720.00									
	6/17/2022 Healey, Christopher J.	Review cases regarding five year dismissal rule.	\$940	0.5		\$470.00									
	6/17/2022 Healey, Christopher J.	Draft correspondence to team regarding same.	\$940	1		\$940.00		0.50		470					
	6/21/2022 Healey, Christopher J.	Prepare for call with Attorney Wallace regarding appellate issues.	\$940	0.2		\$188.00									
	6/21/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding appellate issues.	\$940	0.6		\$564.00									
	6/21/2022 Healey, Christopher J.	Correspondence regarding appellate to-do.	\$940	0.2		\$188.00									
	6/27/2022 Healey, Christopher J.	Review case file.	\$940	0.2		\$188.00									
	6/28/2022 Healey, Christopher J.	Draft standard of review section of Respondent's brief.	\$940	1.6		\$1,504.00									
	6/29/2022 Healey, Christopher J.	Research and analysis regarding DiCarlo public injunctive relief case.	\$940	0.2		\$188.00									
	6/29/2022 Healey, Christopher J.	Review Sunrise's removal petition.	\$940	0.2		\$188.00									
	6/29/2022 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$940	0.2		\$188.00									
	6/29/2022 Healey, Christopher J.	Further drafting regarding Respondent's brief.	\$940	0.2		\$188.00									
	6/30/2022 Healey, Christopher J.	Outline thoughts regarding Brookdale argument.	\$940	0.5		\$470.00									
	7/1/2022 Healey, Christopher J.	Prepare for call with Attorney Wallace regarding Brookdale class argument.	\$940	0.5		\$470.00									
	7/1/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Brookdale argument.	\$940	0.8		\$752.00									
	7/5/2022 Healey, Christopher J.	Analysis correspondence regarding Sunrise's argument that CLRA liability test not applicable to standing question.	\$940	2.4		\$2,256.00									
	7/5/2022 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$940	1		\$940.00									
	7/6/2022 Healey, Christopher J.	Review and analyze new Ninth Circuit class cert decision (Bowerman).	\$940	0.3		\$282.00									
	7/6/2022 Healey, Christopher J.	Correspondence regarding same.	\$940	0.2		\$188.00									
	7/12/2022 Healey, Christopher J.	Correspondence regarding appellate counsel.	\$940	0.1		\$94.00									
	7/12/2022 Healey, Christopher J.	Outline respondents' brief.	\$940	0.4		\$376.00									
	7/12/2022 Healey, Christopher J.	Research regarding TransUnion and Olean progeny.	\$940	1.1		\$1,034.00									
	7/12/2022 Healey, Christopher J.	Research regarding Bates standing issue.	\$940	0.2		\$188.00									
	7/13/2022 Healey, Christopher J.	Correspondence regarding appellate counsel call.	\$940	0.1		\$94.00									
	7/13/2022 Healey, Christopher J.	Research and analysis regarding appellate brief.	\$940	2.7		\$2,538.00									
	7/13/2022 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding to-do issues.	\$940	0.3		\$282.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/14/2022 Healey, Christopher J.	Analysis regarding Tailford decision.	\$940	0.2		\$188.00								
	7/14/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding TransUnion arguments and appellate brief.	\$940	0.7		\$658.00								
	7/14/2022 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding research assignment.	\$940	0.7		\$658.00								
	7/14/2022 Healey, Christopher J.	Analysis of Spokeo III test.	\$940	1.3		\$1,222.00								
	7/14/2022 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$940	0.7		\$658.00								
	7/15/2022 Healey, Christopher J.	Correspondence regarding CLRA legislative history.	\$940	0.1		\$94.00								
	7/15/2022 Healey, Christopher J.	Outline appellate to-do assignments.	\$940	0.1		\$94.00								
	7/15/2022 Healey, Christopher J.	Outline appellate arguments.	\$940	3.6		\$3,384.00								
	7/18/2022 Healey, Christopher J.	Analysis regarding TransUnion standing issues and promissory fraud argument.	\$940	1		\$940.00								
	7/18/2022 Healey, Christopher J.	Research regarding of lack of capacity to perform.	\$940	0.8		\$752.00								
	7/18/2022 Healey, Christopher J.	Outline to-do items.	\$940	0.2		\$188.00								
	7/18/2022 Healey, Christopher J.	Outline appellate arguments.	\$940	0.5		\$470.00								
	7/18/2022 Healey, Christopher J.	Review Birdsong decision.	\$940	0.2		\$188.00								
	7/18/2022 Healey, Christopher J.	Research and analysis regarding standing issues.	\$940	3.4		\$3,196.00								
	7/19/2022 Healey, Christopher J.	Outline appellate arguments.	\$940	1.9		\$1,786.00								
	7/19/2022 Healey, Christopher J.	Prepare correspondence to Attorney Drachler regarding TransUnion briefing.	\$940	0.2		\$188.00								
	7/19/2022 Healey, Christopher J.	Prepare correspondence to Carmen Valero regarding Lexis searches.	\$940	0.2		\$188.00								
	7/20/2022 Healey, Christopher J.	Outline appellate argument.	\$940	2.5		\$2,350.00								
	7/21/2022 Healey, Christopher J.	Correspondence regarding conference call with Attorneys Wallace and Oliver regarding appellate issues.	\$940	0.1		\$94.00								
	7/22/2022 Healey, Christopher J.	Research regarding promissory estoppel and related consumer law issues.	\$940	1.2		\$1,128.00								
	7/22/2022 Healey, Christopher J.	Telephone conference with Carmen Valero regarding follow-up research on risk of harm cases.	\$940	0.3		\$282.00								
	7/22/2022 Healey, Christopher J.	Review cases collected by Carmen Valero on future risk issue.	\$940	2		\$1,880.00								
	7/24/2022 Healey, Christopher J.	Review Restatement of Torts (2d).	\$940	1.2		\$1,128.00								
	7/24/2022 Healey, Christopher J.	Prepare correspondence to file regarding same.	\$940	0.5		\$470.00								
	7/25/2022 Healey, Christopher J.	Outline appellate arguments.	\$940	2.3		\$2,162.00								
	7/25/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding appellate counsel issues.	\$940	0.2		\$188.00								
	7/25/2022 Healey, Christopher J.	Telephone conference with Attorneys Wallace and Oliver regarding appellate briefing.	\$940	0.4		\$376.00								
	7/26/2022 Healey, Christopher J.	Outline appellate briefing.	\$940	1		\$940.00								
	7/26/2022 Healey, Christopher J.	Review CRLA/Elder abuse statutes.	\$940	1		\$940.00								
	7/26/2022 Healey, Christopher J.	Review complaint allegation regarding "risk of harm" issue.	\$940	0.3		\$282.00								
	7/27/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding team costs.	\$940	0.1		\$94.00								
	7/27/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding appellate research issues.	\$940	0.2		\$188.00								
	7/27/2022 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding appellate research tasks.	\$940	0.2		\$188.00								
	7/27/2022 Healey, Christopher J.	Outline appellate arguments.	\$940	2		\$1,880.00								
	7/28/2022 Healey, Christopher J.	Office conference regarding appellate research memorandum.	\$940	0.1		\$94.00								
	7/28/2022 Healey, Christopher J.	Outline key questions regarding appellate argument.	\$940	0.2		\$188.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>	<u>Fees</u>	
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	7/28/2022 Healey, Christopher J.	Review privacy "injury in fact" cases.	\$940	1.3									
		Review cases City TransUnion/Maya and review Rocket Mortgage briefing.	\$940	1.8	\$1,692.00								
	7/29/2022 Healey, Christopher J.	Draft memorandum regarding appellate arguments.	\$940	2.2	\$2,068.00								
	8/1/2022 Healey, Christopher J.	Draft outline of appellate arguments.	\$940	2.4	\$2,256.00								
	8/2/2022 Healey, Christopher J.	Draft outline of appellate arguments.	\$940	3.5	\$3,290.00								
		Prepare correspondence to Attorney Wallace regarding proposed engagement with appellate counsel.	\$940	0.2	\$188.00								
	8/3/2022 Healey, Christopher J.	Draft outline of appellate argument.	\$940	3	\$2,820.00								
	8/3/2022 Healey, Christopher J.	Review Sunrise's request for extension.	\$940	0.1	\$94.00								
	8/3/2022 Healey, Christopher J.	Correspondence with Attorney Wallace regarding same.	\$940	0.1	\$94.00								
	8/4/2022 Healey, Christopher J.	Draft outline of appellate argument.	\$940	1.3	\$1,222.00								
	8/4/2022 Healey, Christopher J.	Further drafting of argument outline.	\$940	2.8	\$2,632.00								
	8/5/2022 Healey, Christopher J.	Outline response argument regarding appeal.	\$940	0.2	\$188.00								
	8/5/2022 Healey, Christopher J.	Draft outline of appellate arguments.	\$940	1.8	\$1,692.00								
	8/8/2022 Healey, Christopher J.	Draft outline of appellate arguments.	\$940	4.5	\$4,230.00								
	8/9/2022 Healey, Christopher J.	Review Olean cert petition.	\$940	0.3	\$282.00								
	8/9/2022 Healey, Christopher J.	Draft outline of appellate arguments.	\$940	3	\$2,820.00								
	8/10/2022 Healey, Christopher J.	Draft outline of appellate arguments.	\$940	2.7	\$2,538.00								
	8/11/2022 Healey, Christopher J.	Draft memorandum regarding appellate arguments.	\$940	3.2	\$3,008.00								
		Outline correspondence to Attorney Wallace regarding to do/discussion points.	\$940	0.2	\$188.00								
	8/11/2022 Healey, Christopher J.	Draft memorandum regarding appellate arguments.	\$940	1	\$940.00								
		Research cases citing to HN12 on monetary harm in Transunion v Ramirez, for C. Healey.	\$360	1	\$360.00								
	8/12/2022 Valero, Carmen A.												
	8/13/2022 Healey, Christopher J.	Draft memorandum regarding appellate arguments.	\$940	3.3	\$3,102.00								
	8/14/2022 Healey, Christopher J.	Draft memorandum regarding appellate arguments.	\$940	2.5	\$2,350.00								
	8/15/2022 Healey, Christopher J.	Draft memorandum regarding appellate arguments.	\$940	4	\$3,760.00								
		Prepare correspondence to Attorney Wallace regarding appellate argument and related issues.	\$940	0.5	\$470.00								
		Prepare correspondence to Attorney Wallace regarding appellate issues and research.	\$940	0.2	\$188.00								
	8/18/2022 Healey, Christopher J.	Update case search regarding TransUnion.	\$940	0.7	\$658.00								
		Follow-up correspondence regarding Attorney Wallace regarding same.	\$940	0.1	\$94.00								
	8/18/2022 Healey, Christopher J.	Review Carmen Valero's research regarding TransUnion.	\$940	0.1	\$94.00								
	8/22/2022 Healey, Christopher J.	Review Negrete decision regarding fed subject matter jurisdiction.	\$940	0.2	\$188.00								
	8/22/2022 Healey, Christopher J.	Review cases citing TransUnion and involving economic injury.	\$940	2	\$1,880.00								
	8/22/2022 Healey, Christopher J.	Office conference with Carmen Valero regarding same.	\$940	0.1	\$94.00								
	8/22/2022 Healey, Christopher J.	Correspondence with Carmen Valero regarding same.	\$940	0.1	\$94.00								
		Correspondence with Attorney Wallace regarding post-TransUnion decisions.	\$940	0.2	\$188.00								
	8/22/2022 Healey, Christopher J.		\$940	0.2	\$188.00								
	8/23/2022 Healey, Christopher J.	Analyze Fleming case and TransUnion discussion.	\$940	0.5	\$470.00								
		Telephone conference with Attorney Wallace regarding appellate issues.	\$940	0.8	\$752.00								
	8/23/2022 Healey, Christopher J.	Draft to-do list.	\$940	0.2	\$188.00								
	9/6/2022 Healey, Christopher J.	Review draft consulting agreement regarding appellate counsel.	\$940	0.2	\$188.00								
	9/6/2022 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$940	0.2	\$188.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	9/7/2022 Healey, Christopher J.	Review Gibson's request regarding motion to seal.	\$940	0.1		\$94.00								
	9/7/2022 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$940	0.1		\$94.00								
	9/7/2022 Healey, Christopher J.	Follow-up correspondence regarding sealing request.	\$940	0.2		\$188.00								
	9/7/2022 Healey, Christopher J.	Review and respond regarding Defendants' Amicus request.	\$940	0.1		\$94.00								
	9/10/2022 Healey, Christopher J.	Correspondence with Attorney Wallace regarding Defendants' appellate brief.	\$940	0.1		\$94.00								
	9/10/2022 Healey, Christopher J.	Review Defendants' appellate brief.	\$940	1		\$940.00								
	9/11/2022 Healey, Christopher J.	Outline to do issues regarding appeal.	\$940	0.1		\$94.00								
	9/12/2022 Healey, Christopher J.	Correspondence regarding appellate record.	\$940	0.1		\$94.00								
	9/12/2022 Healey, Christopher J.	Review and analyze Sunrise's motion to seal.	\$940	1.2		\$1,128.00								
	9/12/2022 Healey, Christopher J.	Draft opposition to motion to seal.	\$940	2		\$1,880.00								
	9/12/2022 Healey, Christopher J.	Revise opposition to motion to seal.	\$940	0.2		\$188.00								
	9/12/2022 Healey, Christopher J.	Prepare correspondence regarding appellate consulting agreement.	\$940	0.1		\$94.00								
	9/12/2022 Healey, Christopher J.	Prepare correspondence regarding conference call agenda and to do issues.	\$940	0.1		\$94.00								
	9/13/2022 Healey, Christopher J.	Revise opposition to Defendants' motion to seal.	\$940	1.7		\$1,598.00								
	9/13/2022 Healey, Christopher J.	Prepare correspondence regarding appellate research.	\$940	0.1		\$94.00								
	9/13/2022 Healey, Christopher J.	Prepare correspondence to team regarding draft opposition to motion to seal.	\$940	0.1		\$94.00								
	9/13/2022 Healey, Christopher J.	Review Attorney Umpierre's correspondence regarding motion to seal.	\$940	0.2		\$188.00								
	9/13/2022 Healey, Christopher J.	Prepare for conference call.	\$940	0.5		\$470.00								
	9/13/2022 Healey, Christopher J.	Telephone conference with team regarding appellate briefing.	\$940	1		\$940.00			1	940.00				
	9/13/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding potential Amicus briefing.	\$940	0.2		\$188.00								
	9/13/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding opposition to motion to seal.	\$940	0.2		\$188.00								
	9/13/2022 Howard, Kathryn M.	Analysis of opposition to appellant's motion to maintain documents under seal.	\$325	1.4		\$455.00								
	9/13/2022 Howard, Kathryn M.	Check legal citations.	\$325	0.3		\$97.50								
	9/13/2022 Howard, Kathryn M.	Revise same.	\$325	0.2		\$65.00								
	9/13/2022 Howard, Kathryn M.	Finalize opposition.	\$325	0.2		\$65.00								
	9/13/2022 Howard, Kathryn M.	Prepare email to C. Healey regarding same.	\$325	0.1		\$32.50								
	9/14/2022 Healey, Christopher J.	Research TransUnion decisions.	\$940	0.7		\$658.00								
	9/14/2022 Healey, Christopher J.	Review Umpierre declaration to motion to seal opposition.	\$940	0.2		\$188.00								
	9/14/2022 Healey, Christopher J.	Revise opposition to motion to seal.	\$940	1.5		\$1,410.00			1	940.00				
	9/14/2022 Howard, Kathryn M.	Revise opposition to motion to seal.	\$325	0.1		\$32.50								
	9/15/2022 Healey, Christopher J.	Correspondence with team regarding potential appellate arguments.	\$940	0.5		\$470.00								
	9/15/2022 Healey, Christopher J.	Review and revise opposition to Defendants' sealing request.	\$940	0.5		\$470.00								
	9/15/2022 Healey, Christopher J.	Outline key points from Sunrise opening brief.	\$940	2.3		\$2,162.00								
	9/16/2022 Healey, Christopher J.	Outline response to Defendants' opening brief.	\$940	3.2		\$3,008.00								
	9/19/2022 Healey, Christopher J.	Draft response to Defendants' opening appellate brief.	\$940	3.6		\$3,384.00								
	9/19/2022 Healey, Christopher J.	Correspondence regarding index of record.	\$940	0.1		\$94.00								
	9/20/2022 Healey, Christopher J.	Draft response to Defendants' opening appellate brief.	\$940	3.2		\$3,008.00								
	9/21/2022 Healey, Christopher J.	Draft response to Defendants' opening appellate brief.	\$940	3		\$2,820.00								
	9/22/2022 Healey, Christopher J.	Draft response to Defendants' opening appellate brief.	\$940	4.2		\$3,948.00								
	9/23/2022 Healey, Christopher J.	Draft response to Defendant's opening appellate brief.	\$940	3.2		\$3,008.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	9/24/2022 Healey, Christopher J.	Draft response to Defendant's appellant's opening brief.	\$940	2.3		\$2,162.00								
	9/25/2022 Healey, Christopher J.	Draft response to appellant's opening brief.	\$940	1.5		\$1,410.00								
	9/26/2022 Healey, Christopher J.	Draft response to appellant's opening brief.	\$940	3.5		\$3,290.00								
	9/26/2022 Healey, Christopher J.	Review Attorney Wallace's inserts regarding same.	\$940	0.2		\$188.00								
	9/27/2022 Healey, Christopher J.	Draft response to appellant's opening brief.	\$940	2.5		\$2,350.00								
	9/28/2022 Healey, Christopher J.	Draft response to appellant's opening brief.	\$940	3.5		\$3,290.00								
	9/28/2022 Healey, Christopher J.	Review Schneider Wallace research memorandum	\$940	0.2		\$188.00								
	9/28/2022 Healey, Christopher J.	Follow-up correspondence regarding same.	\$940	0.3		\$282.00								
	9/29/2022 Healey, Christopher J.	Draft response to appellant's opening brief.	\$940	4.7		\$4,418.00		2	1,880.00					
	9/29/2022 Healey, Christopher J.	Review Attorney Byber's correspondence regarding promissory fraud cases.	\$940	0.1		\$94.00								
	9/30/2022 Healey, Christopher J.	Draft response to appellant's opening brief.	\$940	6.2		\$5,828.00		2	1,880.00					
	10/1/2022 Healey, Christopher J.	Draft response to appellant's opening brief.	\$940	1.2		\$1,128.00								
	10/3/2022 Healey, Christopher J.	Draft response to appellant's opening brief.	\$940	3.9		\$3,666.00								
	10/3/2022 Healey, Christopher J.	Prepare correspondence to team regarding draft brief.	\$940	0.1		\$94.00								
	10/4/2022 Healey, Christopher J.	Draft response to appellant's opening brief.	\$940	1.3		\$1,222.00								
	10/4/2022 Healey, Christopher J.	Review Johnson's email regarding record review.	\$940	0.1		\$94.00								
	10/5/2022 Healey, Christopher J.	Draft response to appellant's opening brief.	\$940	1.3		\$1,222.00								
	10/5/2022 Healey, Christopher J.	Prepare correspondence regarding draft brief.	\$940	0.1		\$94.00								
	10/6/2022 Healey, Christopher J.	Draft response to appellant's opening brief.	\$940	3.5		\$3,290.00								
	10/7/2022 Healey, Christopher J.	Draft opposition to appellant's opening brief.	\$940	0.6		\$564.00								
	10/7/2022 Healey, Christopher J.	Office conference regarding same.	\$940	0.1		\$94.00								
	10/7/2022 Healey, Christopher J.	Prepare response to team regarding draft brief.	\$940	0.2		\$188.00								
	10/10/2022 Healey, Christopher J.	Prepare correspondence to team regarding appellate briefing.	\$940	0.2		\$188.00								
	10/10/2022 Healey, Christopher J.	Review Attorney Johnson's memorandum regarding record cites.	\$940	0.1		\$94.00								
	10/10/2022 Healey, Christopher J.	Review summary of amicus briefs.	\$940	0.2		\$188.00								
	10/10/2022 Healey, Christopher J.	Review cases cites by amicus briefs.	\$940	0.2		\$188.00								
	10/10/2022 Healey, Christopher J.	Prepare for team call.	\$940	0.1		\$94.00								
	10/11/2022 Healey, Christopher J.	Correspondence regarding team call.	\$940	0.2		\$188.00								
	10/11/2022 Healey, Christopher J.	Outline to-do items regarding response briefing.	\$940	1.5		\$1,410.00								
	10/11/2022 Healey, Christopher J.	Prepare for team call.	\$940	0.7		\$658.00								
	10/11/2022 Healey, Christopher J.	Conference call with team regarding appellate brief.	\$940	1.5		\$1,410.00			1.5	1,410.00				
	10/12/2022 Healey, Christopher J.	Correspondence to team regarding "risk of harm" arguments.	\$940	0.6		\$564.00								
	10/12/2022 Healey, Christopher J.	Correspondence with Attorney Bybee regarding research assignment.	\$940	0.1		\$94.00								
	10/12/2022 Healey, Christopher J.	Research and analysis regarding reliance presumption.	\$940	0.5		\$470.00								
	10/12/2022 Healey, Christopher J.	Prepare to-do list regarding response brief.	\$940	0.9		\$846.00								
	10/12/2022 Healey, Christopher J.	Telephone conference with Attorney Bybee regarding research issue.	\$940	0.3		\$282.00								
	10/12/2022 Healey, Christopher J.	Research regarding Sunrise airline hypo.	\$940	0.2		\$188.00								
	10/12/2022 Healey, Christopher J.	Prepare correspondence to Carmen Valero regarding follow-up research regarding same.	\$940	0.1		\$94.00								
	10/12/2022 Healey, Christopher J.	Outline revisions to appellant's opening brief response.	\$940	1.6		\$1,504.00								
	10/12/2022 Valero, Carmen A.	Research federal regulations regarding airline overbooking/oversales, and disclosure requirements, for C. Healey.	\$360	0.1		\$36.00								
	10/13/2022 Healey, Christopher J.	Draft opposition to appellant's opening brief.	\$940	0.2		\$188.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	10/13/2022 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding failed services risk issue.	\$940	0.3	\$282.00								
	10/13/2022 Healey, Christopher J.	Follow-up correspondence regarding same.	\$940	0.1	\$94.00								
	10/13/2022 Healey, Christopher J.	Research and analysis regarding benefit of bargain issue.	\$940	1									
	10/14/2022 Healey, Christopher J.	Draft opposition to appellant's opening brief.	\$940	0.5	\$470.00								
	10/14/2022 Healey, Christopher J.	Research and analysis regarding lost benefit argument.	\$940	1.5	\$1,410.00								
	10/15/2022 Healey, Christopher J.	Outline appellate arguments.	\$940	0.5	\$470.00								
	10/17/2022 Healey, Christopher J.	Prepare for team call.	\$940	0.3	\$282.00								
	10/17/2022 Healey, Christopher J.	Telephone conference with team regarding risk of failed services issue.	\$940	0.5	\$470.00				0.5	470.00			
	10/17/2022 Healey, Christopher J.	Analysis regarding Clapper injunctive relief standing test.	\$940	0.8	\$752.00								
	10/17/2022 Healey, Christopher J.	Analysis regarding reliance argument.	\$940	0.7	\$658.00								
	10/18/2022 Healey, Christopher J.	Outline inserts to answering brief.	\$940	0.2	\$188.00								
	10/18/2022 Healey, Christopher J.	Draft response to appellant's opening brief.	\$940	3.5	\$3,290.00								
	10/18/2022 Healey, Christopher J.	Prepare correspondence to Kennedy's office regarding damage question.	\$940	0.2	\$188.00								
	10/19/2022 Healey, Christopher J.	Outline inserts to answering brief.	\$940	0.4	\$376.00								
	10/19/2022 Healey, Christopher J.	Draft response to appellant's opening brief.	\$940	2.7	\$2,538.00								
	10/19/2022 Healey, Christopher J.	Correspondence with Attorney Wallace regarding expert arguments.	\$940	0.2	\$188.00								
	10/20/2022 Healey, Christopher J.	Revise answering brief.	\$940	2.5	\$2,350.00								
	10/20/2022 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding 23 (f) petition.	\$940	0.1	\$94.00								
	10/21/2022 Healey, Christopher J.	Outline inserts to answering brief.	\$940	0.2	\$188.00								
	10/21/2022 Healey, Christopher J.	Revise answering brief.	\$940	3.5	\$3,290.00								
	10/21/2022 Healey, Christopher J.	Prepare correspondence regarding Flores testimony (Table 3) issue.	\$940	0.2	\$188.00								
	10/24/2022 Healey, Christopher J.	Revise answering brief.	\$940	4	\$3,760.00								
	10/24/2022 Healey, Christopher J.	Review Attorney Wallace's insert on motion to strike rulings.	\$940	0.1	\$94.00								
	10/24/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding same.	\$940	0.1	\$94.00								
	10/25/2022 Healey, Christopher J.	Revise answering brief.	\$940	3.5	\$3,290.00			1	940.00				
	10/26/2022 Healey, Christopher J.	Revise answering brief.	\$940	5.5	\$5,170.00			1	940.00				
	10/27/2022 Healey, Christopher J.	Revise answering brief.	\$940	4.8	\$4,512.00			2	1,880.00				
	10/27/2022 Healey, Christopher J.	Prepare correspondence to Attorney Yarnell regarding Appellant's opening brief.	\$940	0.1	\$94.00								
	10/28/2022 Healey, Christopher J.	Review Wilson, Hodson cases.	\$940	0.2	\$188.00								
	10/28/2022 Healey, Christopher J.	Revise answering brief.	\$940	4	\$3,760.00								
	10/28/2022 Healey, Christopher J.	Correspondence with team regarding reliance arguments.	\$940	0.2	\$188.00								
	10/30/2022 Healey, Christopher J.	Outline arguments in response to Sunrise's expert appellate arguments.	\$940	0.7	\$658.00								
	10/31/2022 Healey, Christopher J.	Revise answering brief.	\$940	4.7	\$4,418.00			1	940.00				
	11/1/2022 Healey, Christopher J.	Revise answering brief.	\$940	4	\$3,760.00								
	11/1/2022 Healey, Christopher J.	Correspondence regarding Kennedy call.	\$940	0.1	\$94.00								
	11/2/2022 Healey, Christopher J.	Revise answering brief.	\$940	3	\$2,820.00								
	11/2/2022 Healey, Christopher J.	Telephone conference with Expert Kennedy regarding damage model arguments.	\$940	0.7	\$658.00								
	11/2/2022 Healey, Christopher J.	Prepare correspondence to Kennedy's office regarding same.	\$940	0.1	\$94.00								
	11/2/2022 Healey, Christopher J.	Telephone conference with Attorneys Umpierre and Wallace regarding briefing issue.	\$940	0.3	\$282.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>	<u>Fees</u>	<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	11/3/2022 Healey, Christopher J.	Revise answering brief.	\$940	2.2	\$2,068.00								
	11/4/2022 Healey, Christopher J.	Revise answering brief.	\$940	3.7	\$3,478.00	1	940.00						
	11/4/2022 Healey, Christopher J.	Correspondence regarding team calls.	\$940	0.2	\$188.00								
	11/5/2022 Healey, Christopher J.	Outline preparation for Amicus call.	\$940	0.1	\$94.00								
	11/5/2022 Healey, Christopher J.	Revise answering brief.	\$940	1	\$940.00								
	11/7/2022 Healey, Christopher J.	Revise answering brief.	\$940	5.6	\$5,264.00	2	1,880.00						
	11/7/2022 Healey, Christopher J.	Telephone conference with Attorney Marks.	\$940	0.3	\$282.00								
	11/8/2022 Healey, Christopher J.	Revise answering brief.	\$940	3.8	\$3,572.00	1	940.00						
	11/8/2022 Healey, Christopher J.	Prepare correspondence to team regarding draft brief and team call.	\$940	0.2	\$188.00								
	11/9/2022 Healey, Christopher J.	Research and correspondence regarding reliance prescription issue.	\$940	0.3	\$282.00								
	11/9/2022 Healey, Christopher J.	Review appellate procedure rules.	\$940	0.2	\$188.00								
	11/9/2022 Healey, Christopher J.	Prepare for team call.	\$940	0.3	\$282.00								
	11/9/2022 Healey, Christopher J.	Telephone conference with team regarding appellate issues.	\$940	0.9	\$846.00			0.9	846.00				
	11/9/2022 Healey, Christopher J.	Draft to-do list regarding appeal issues.	\$940	0.3	\$282.00								
	11/9/2022 Healey, Christopher J.	Prepare correspondence to team regarding record.	\$940	0.1	\$94.00								
	11/10/2022 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding redacted brief and amicus call.	\$940	0.2	\$188.00								
	11/10/2022 Healey, Christopher J.	Correspondence with Attorney Olivier regarding appeal.	\$940	0.1	\$94.00								
	11/10/2022 Healey, Christopher J.	Draft to-do list regarding appellate briefing.	\$940	0.1	\$94.00								
	11/10/2022 Healey, Christopher J.	Prepare for amicus call.	\$940	0.5	\$470.00								
	11/10/2022 Healey, Christopher J.	Research regarding standard of review/appellate role.	\$940	0.7	\$658.00								
	11/11/2022 Healey, Christopher J.	Telephone conference with Attorneys Wallace and Umpierre regarding appellate issues.	\$940	0.3	\$282.00								
	11/11/2022 Healey, Christopher J.	Prepare for conference call regarding amici.	\$940	0.2	\$188.00								
	11/11/2022 Healey, Christopher J.	Telephone conference with amici and counsel regarding appellate issues.	\$940	1	\$940.00								
	11/11/2022 Healey, Christopher J.	Prepare correspondence to Attorney Chicotel regarding potential amicus packing.	\$940	0.2	\$188.00								
	11/14/2022 Healey, Christopher J.	Telephone conference with Attorney Chicotel regarding CANHR amicus participation.	\$940	0.5	\$470.00								
	11/14/2022 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$940	0.2	\$188.00								
	11/14/2022 Healey, Christopher J.	Correspondence with Attorney Wallace regarding appellate issues.	\$940	0.2	\$188.00								
	11/14/2022 Healey, Christopher J.	Review TransUnion progeny.	\$940	0.1	\$94.00								
	11/14/2022 Healey, Christopher J.	Prepare correspondence to team regarding recent Art III standing decision.	\$940	0.2	\$188.00								
	11/15/2022 Healey, Christopher J.	Review Attorney Olivier's comments regarding draft brief.	\$940	0.2	\$188.00								
	11/15/2022 Healey, Christopher J.	Review Attorney Johnson's comments regarding brief.	\$940	0.2	\$188.00								
	11/15/2022 Healey, Christopher J.	Prepare for team call.	\$940	0.1	\$94.00								
	11/15/2022 Healey, Christopher J.	Telephone conference with Attorneys Olivier and Wallace regarding draft brief.	\$940	0.6	\$564.00								
	11/15/2022 Healey, Christopher J.	Draft to-do list regarding brief.	\$940	0.5	\$470.00								
	11/16/2022 Healey, Christopher J.	Revise answering brief.	\$940	3.5	\$3,290.00	1	940.00						
	11/17/2022 Healey, Christopher J.	Prepare correspondence to Attorney Chicotel regarding potential CANHR amicus brief.	\$940	0.3	\$282.00								
	11/17/2022 Healey, Christopher J.	Revise answering brief.	\$940	3	\$2,820.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	11/17/2022 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding reliance presumption.	\$940	0.2		\$188.00									
	11/18/2022 Healey, Christopher J.	Review correspondence regarding amicus counsel (AARP).	\$940	0.1		\$94.00									
	11/18/2022 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$940	0.1		\$94.00									
	11/18/2022 Healey, Christopher J.	Research and analysis regarding reliance cases.	\$940	2.5		\$2,350.00		1	940.00						
	11/18/2022 Healey, Christopher J.	Review Ms. Valero's memorandum regarding reliance cases.	\$940	0.5		\$470.00									
	11/21/2022 Healey, Christopher J.	Review research results regarding reliance issue.	\$940	0.5		\$470.00									
	11/21/2022 Healey, Christopher J.	Research and analysis regarding reliance issue.	\$940	0.3		\$282.00									
	11/21/2022 Healey, Christopher J.	Review answering brief.	\$940	2.6		\$2,444.00									
	11/21/2022 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding draft brief.	\$940	0.3		\$282.00									
	11/21/2022 Healey, Christopher J.	Prepare correspondence to Kennedy's office regarding timing issue.	\$940	0.1		\$94.00									
	11/29/2022 Healey, Christopher J.	Review correspondence regarding appellate briefing schedule.	\$940	0.1		\$94.00									
	11/30/2022 Healey, Christopher J.	Research and analysis regarding reliance inference.	\$940	2		\$1,880.00		1	940.00						
	12/1/2022 Healey, Christopher J.	Outline insert on reliance inference.	\$940	0.3		\$282.00									
	12/1/2022 Healey, Christopher J.	Research and analysis regarding reliance issues.	\$940	1		\$940.00									
	12/1/2022 Healey, Christopher J.	Prepare for Kennedy call.	\$940	0.1		\$94.00									
	12/1/2022 Healey, Christopher J.	Call with Kennedy regarding timing issue on shortfall.	\$940	0.6		\$564.00									
	12/1/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding status and appellate brief.	\$940	0.2		\$188.00									
	12/2/2022 Healey, Christopher J.	Review correspondence from Attorney Umpierre regarding Kennedy testimony.	\$940	0.1		\$94.00									
	12/2/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding settlement issues.	\$940	0.2		\$188.00									
	12/2/2022 Healey, Christopher J.	Outline inserts to appellate brief.	\$940	0.2		\$188.00									
	12/5/2022 Healey, Christopher J.	Draft inserts to answering brief.	\$940	3		\$2,820.00									
	12/6/2022 Healey, Christopher J.	Research and analysis regarding Mass Mutual and reliance cases.	\$940	3.3		\$3,102.00		2	1,880.00						
	12/7/2022 Healey, Christopher J.	Revise answering brief.	\$940	2.5		\$2,350.00									
	12/7/2022 Healey, Christopher J.	Research and analysis regarding reliance cases.	\$940	1		\$940.00									
	12/7/2022 Healey, Christopher J.	Outline inserts to answering brief.	\$940	0.5		\$470.00									
	12/7/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding brief and related issues.	\$940	0.2		\$188.00									
	12/8/2022 Healey, Christopher J.	Revise answering brief.	\$940	4.3		\$4,042.00									
	12/9/2022 Healey, Christopher J.	Revise answering brief.	\$940	4		\$3,760.00									
	12/10/2022 Healey, Christopher J.	Revise answering brief.	\$940	2.5		\$2,350.00									
	12/11/2022 Healey, Christopher J.	Revise answering brief.	\$940	1		\$940.00									
	12/12/2022 Healey, Christopher J.	Telephone conference with Attorney Marks regarding settlement inquiry and witness investigation.	\$940	0.3		\$282.00									
	12/12/2022 Healey, Christopher J.	Prepare correspondence to team regarding settlement inquiry.	\$940	0.2		\$188.00									
	12/12/2022 Healey, Christopher J.	Revise answering brief.	\$940	3.4		\$3,196.00		1	940.00						
	12/12/2022 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$940	0.1		\$94.00									
	12/13/2022 Healey, Christopher J.	Review TransUnion cases.	\$940	0.8		\$752.00									
	12/13/2022 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$940	0.2		\$188.00									
	12/14/2022 Healey, Christopher J.	Correspondence regarding draft brief.	\$940	0.1		\$94.00									
	12/14/2022 Healey, Christopher J.	To-do correspondence regarding same.	\$940	0.1		\$94.00									
	12/14/2022 Healey, Christopher J.	Review Attorney Wallace's comments to answering brief.	\$940	1		\$940.00									
	12/14/2022 Healey, Christopher J.	Revise answering brief.	\$940	1.2		\$1,128.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>	<u>Fees</u>	<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>		
	12/17/2022 Healey, Christopher J.	Revise answering brief.	\$940	1.5	\$1,410.00										
	12/19/2022 Healey, Christopher J.	Telephone conference with potential amici regarding case background.	\$940	1	\$940.00										
	12/19/2022 Healey, Christopher J.	Prepare correspondence regarding same.	\$940	0.1	\$94.00										
	12/19/2022 Healey, Christopher J.	Revise answering brief.	\$940	2.2	\$2,068.00										
	12/20/2022 Healey, Christopher J.	Prepare for Attorney Wallace call.	\$940	0.2	\$188.00										
	12/20/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding revisions to answering brief.	\$940	0.5	\$470.00										
	12/20/2022 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding agreement.	\$940	0.2	\$188.00										
	12/20/2022 Healey, Christopher J.	Revise answering brief.	\$940	4.5	\$4,230.00										
	12/21/2022 Healey, Christopher J.	Revise answering brief.	\$940	4.4	\$4,136.00	1	940.00								
	12/22/2022 Healey, Christopher J.	Revise answering brief.	\$940	1	\$940.00										
	12/22/2022 Healey, Christopher J.	Prepare correspondence to team regarding schedule.	\$940	0.2	\$188.00										
	12/22/2022 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding record and relating issues.	\$940	0.2	\$188.00										
	12/22/2022 Healey, Christopher J.	Correspondence regarding legal cite check.	\$940	0.1	\$94.00										
	12/22/2022 Healey, Christopher J.	Review Attorney Umpierre's correspondence regarding revisions to brief.	\$940	0.2	\$188.00										
	12/22/2022 Healey, Christopher J.	Revise answering brief.	\$940	0.5	\$470.00										
	12/22/2022 Healey, Christopher J.	Correspondence with Attorney Wallace regarding proposed damages to brief.	\$940	0.3	\$282.00										
	12/22/2022 Howard, Kathryn M.	Analysis of Plaintiffs' 9th Circuit Answering Brief and check all legal citations.	\$325	2.8	\$910.00										
	12/22/2022 Howard, Kathryn M.	Revise Answering Brief.	\$325	0.4	\$130.00										
	12/22/2022 Howard, Kathryn M.	Email exchanges with C. Healey regarding same.	\$325	0.1	\$32.50										
	12/28/2022 Healey, Christopher J.	Research regarding TransUnion cases.	\$940	0.3	\$282.00										
	12/28/2022 Healey, Christopher J.	Correspondence regarding oral argument schedule.	\$940	0.2	\$188.00										
	12/28/2022 Healey, Christopher J.	Correspondence with Attorney Oliver regarding revisions to answering brief.	\$940	0.2	\$188.00										
	12/29/2022 Healey, Christopher J.	Review comments from Attorney Oliver regarding answering brief.	\$940	0.5	\$470.00										
	12/29/2022 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding same.	\$940	0.2	\$188.00										
	12/30/2022 Healey, Christopher J.	Revise answering brief to incorporate Attorney Oliver's comments.	\$940	3.7	\$3,478.00	1	940.00								
	12/31/2022 Healey, Christopher J.	Revise answering brief.	\$940	2.3	\$2,162.00										
	1/1/2023 Healey, Christopher J.	Revise answering brief.	\$1,010	0.5	\$505.00										
	1/2/2023 Healey, Christopher J.	Revise answering brief.	\$1,010	4.7	\$4,747.00	2	2,020.00								
	1/3/2023 Healey, Christopher J.	Correspondence regarding team call on appellate issues.	\$1,010	0.2	\$202.00										
	1/3/2023 Healey, Christopher J.	Correspondence regarding revisions to answering brief.	\$1,010	0.2	\$202.00										
	1/3/2023 Healey, Christopher J.	Revise answering brief.	\$1,010	3.2	\$3,232.00	1	1,010.00								
	1/3/2023 Healey, Christopher J.	Telephone conference with Attorney Oliver regarding appellate brief and key argument.	\$1,010	0.6	\$606.00										
	1/3/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding status and briefing.	\$1,010	0.1	\$101.00										
	1/4/2023 Healey, Christopher J.	Revise answering brief.	\$1,010	1.1	\$1,111.00										
	1/4/2023 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.1	\$101.00										
	1/4/2023 Healey, Christopher J.	Prepare agenda for team call.	\$1,010	0.6	\$606.00										
	1/4/2023 Healey, Christopher J.	Prepare for team call.	\$1,010	0.2	\$202.00										

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>					
				<u>Worked</u>		<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>	<u>Fees</u>		
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	1/4/2023 Healey, Christopher J.	Telephone conference with team regarding answering brief.	\$1,010	1									
	1/4/2023 Healey, Christopher J.	Follow-up correspondence regarding same.	\$1,010	0.3									
	1/4/2023 Healey, Christopher J.	Revise brief.	\$1,010	0.2									
	1/5/2023 Healey, Christopher J.	Correspondence regarding revisions to answering brief.	\$1,010	0.3									
	1/5/2023 Healey, Christopher J.	Revise answering brief.	\$1,010	1.6									
	1/5/2023 Healey, Christopher J.	Telephone conferences with Attorneys Umpierre and Wallace regarding evidentiary foundation for DSS citations.	\$1,010	0.8									
	1/5/2023 Healey, Christopher J.	Research regarding admissibility issues.	\$1,010	0.2									
	1/6/2023 Healey, Christopher J.	Review Attorney Wallace's insert regarding Happy Resident declarations.	\$1,010	0.2									
	1/6/2023 Healey, Christopher J.	Revise answer brief.	\$1,010	3.7				2	2,020.00				
	1/7/2023 Healey, Christopher J.	Revise answering brief.	\$1,010	1.9									
	1/8/2023 Healey, Christopher J.	Revise answering brief.	\$1,010	2.5									
	1/9/2023 Healey, Christopher J.	Review Attorney Umpierre's research correspondence regarding DSS records and admissibility issues.	\$1,010	0.1									
	1/9/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$1,010	0.2									
	1/9/2023 Healey, Christopher J.	Revise answering brief.	\$1,010	2.4									
	1/10/2023 Healey, Christopher J.	Update autocite on TransUnion and other key cases.	\$1,010	1				1	1,010.00				
	1/10/2023 Healey, Christopher J.	Revise answering brief.	\$1,010	0.5									
	1/10/2023 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding evidence issue.	\$1,010	0.1									
	1/10/2023 Healey, Christopher J.	Draft to-do list for remaining issues.	\$1,010	0.5									
	1/10/2023 Healey, Christopher J.	Prepare correspondence regarding Ganz status.	\$1,010	0.1									
	1/11/2023 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding potential insert.	\$1,010	0.1									
	1/11/2023 Healey, Christopher J.	Draft revisions to Answering Brief.	\$1,010	2.3									
	1/12/2023 Healey, Christopher J.	Review Attorney Oliver's changes to brief.	\$1,010	1									
	1/12/2023 Healey, Christopher J.	Revise answering brief.	\$1,010	3.3				3.3	3,333.00				
	1/12/2023 Healey, Christopher J.	Correspondence with team regarding same.	\$1,010	0.2									
	1/12/2023 Howard, Kathryn M.	Email exchanges regarding cite checking the updated answering brief.	\$325	0.1									
	1/12/2023 Howard, Kathryn M.	Brief review of answering brief.	\$325	0.4									
	1/13/2023 Healey, Christopher J.	Review proposed insert to answering brief.	\$1,010	0.5									
	1/13/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding answering brief.	\$1,010	0.2									
	1/13/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding record issues and brief.	\$1,010	0.3									
	1/13/2023 Healey, Christopher J.	Correspondence regarding potential consumer amici.	\$1,010	0.5									
	1/13/2023 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding brief.	\$1,010	0.2									
	1/13/2023 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding brief.	\$1,010	0.2									
	1/13/2023 Healey, Christopher J.	Analysis regarding payment issue.	\$1,010	0.30									
	1/13/2023 Howard, Kathryn M.	Review Appellee's Answering Brief and research all legal citations.	\$325	3.2									
	1/13/2023 Howard, Kathryn M.	Review cited case law to determine if cases are still good law.	\$325	0.3									
	1/13/2023 Howard, Kathryn M.	Revise citations in Answering Brief.	\$325	0.4									
	1/13/2023 Howard, Kathryn M.	Finalize Answering Brief.	\$325	0.3									
	1/13/2023 Howard, Kathryn M.	Prepare email to C. Healey regarding findings.	\$325	0.1									
	1/15/2023 Healey, Christopher J.	Review Attorney Oliver's revisions to summary of argument.	\$1,010	0.5									
	1/15/2023 Healey, Christopher J.	Revise answering brief.	\$1,010	1.7									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/16/2023 Healey, Christopher J.	Review record cites and revise answering brief.	\$1,010	5.4		\$5,454.00								
	1/17/2023 Healey, Christopher J.	Review record cites.	\$1,010	0.3		\$303.00								
	1/17/2023 Healey, Christopher J.	Revise answering brief.	\$1,010	0.3		\$303.00								
	1/17/2023 Healey, Christopher J.	Prepare correspondence to Attorney Umpiere and Ms. Valdez regarding record issues.	\$1,010	0.2		\$202.00								
	1/17/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding record and revisions to brief.	\$1,010	0.4		\$404.00								
	1/17/2023 Healey, Christopher J.	Review SER materials.	\$1,010	1		\$1,010.00								
	1/17/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$1,010	0.5		\$505.00								
	1/17/2023 Healey, Christopher J.	Draft revisions to answering brief.	\$1,010	1.5		\$1,515.00								
	1/18/2023 Healey, Christopher J.	Revise answering brief.	\$1,010	2.5		\$2,525.00								
	1/18/2023 Healey, Christopher J.	Telephone conference with counsel for potential consumer amicus.	\$1,010	0.8		\$808.00								
	1/18/2023 Healey, Christopher J.	Review Attorney Umpierre's revisions to updated cites.	\$1,010	0.5		\$505.00								
	1/18/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding brief.	\$1,010	0.2		\$202.00								
	1/20/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding record issue.	\$1,010	0.3		\$303.00								
	1/20/2023 Healey, Christopher J.	Prepare correspondence to team regarding brief.	\$1,010	0.1		\$101.00								
	1/20/2023 Healey, Christopher J.	Review and comment on AARP amicus brief.	\$1,010	0.8		\$808.00								
	1/20/2023 Healey, Christopher J.	Prepare correspondence to Attorneys Wallace and Oliver regarding same.	\$1,010	0.2		\$202.00								
	1/20/2023 Healey, Christopher J.	Follow-up correspondence regarding amicus brief.	\$1,010	0.4		\$404.00								
	1/23/2023 Healey, Christopher J.	Status correspondence to team regarding answering brief.	\$1,010	0.2		\$202.00								
	1/23/2023 Healey, Christopher J.	Review Defendant's amicus briefs.	\$1,010	1		\$1,010.00								
	1/23/2023 Healey, Christopher J.	Prepare correspondence to team regarding additional changes to brief.	\$1,010	0.3		\$303.00								
	1/23/2023 Healey, Christopher J.	Prepare for team call regarding filing.	\$1,010	0.1		\$101.00								
	1/24/2023 Healey, Christopher J.	Prepare for team call.	\$1,010	0.1		\$101.00								
	1/24/2023 Healey, Christopher J.	Attend team call regarding filing and related issues.	\$1,010	0.5		\$505.00								
	1/24/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding amicus comments.	\$1,010	0.2		\$202.00								
	1/24/2023 Healey, Christopher J.	Prepare correspondence to team regarding abstention issues.	\$1,010	1		\$1,010.00								
	1/24/2023 Healey, Christopher J.	Outline comments regarding AARP amicus brief.	\$1,010	1.2		\$1,212.00								
	1/25/2023 Healey, Christopher J.	Correspondence with AARP counsel regarding amicus brief.	\$1,010	0.1		\$101.00								
	1/25/2023 Healey, Christopher J.	Prepare for call re AARP amicus brief	\$1,010	0.2		\$202.00								
	1/25/2023 Healey, Christopher J.	Review Supplemental Record (SER) cites in answering brief.	\$1,010	0.5		\$505.00								
	1/25/2023 Healey, Christopher J.	Telephone conference with AARP counsel regarding amicus brief.	\$1,010	0.5		\$505.00								
	1/25/2023 Healey, Christopher J.	Review court approval orders from prior settlements.	\$1,010	0.2		\$202.00								
	1/25/2023 Healey, Christopher J.	Follow-up correspondence with AARP.	\$1,010	0.1		\$101.00								
	1/25/2023 Healey, Christopher J.	Office conference regarding injunction orders.	\$1,010	0.2		\$202.00								
	1/25/2023 Healey, Christopher J.	Review TransUnion progeny decisions.	\$1,010	0.4		\$404.00								
	1/25/2023 Healey, Christopher J.	Review Supplement Record (SER) cites and correspondence to team regarding same.	\$1,010	2.5		\$2,525.00	2	2,020.00						
	1/25/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$1,010	0.3		\$303.00								
	1/25/2023 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding potential revisions to brief.	\$1,010	0.2		\$202.00								
	1/25/2023 Healey, Christopher J.	Review Schneider Wallace changes to brief.	\$1,010	0.5		\$505.00								
	1/25/2023 Healey, Christopher J.	Outline additional changes.	\$1,010	0.7		\$707.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>					
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>		
							<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/25/2023 Healey, Christopher J.	Research regarding Daubert.	\$1,010	0.3		\$303.00						
	1/26/2023 Healey, Christopher J.	Revise answering brief.	\$1,010	1		\$1,010.00						
	1/26/2023 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.2		\$202.00						
	1/26/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding same.	\$1,010	0.2		\$202.00						
	1/26/2023 Healey, Christopher J.	Correspondence regarding answering brief.	\$1,010	0.5		\$505.00						
	1/26/2023 Healey, Christopher J.	Review Ninth Circuit decision (Win) and prepare correspondence regarding same.	\$1,010	0.5		\$505.00						
	1/27/2023 Healey, Christopher J.	Review AARP amicus brief.	\$1,010	0.3		\$303.00						
	1/27/2023 Healey, Christopher J.	Correspondence regarding consumer amicus.	\$1,010	0.2		\$202.00						
	1/27/2023 Healey, Christopher J.	Review final draft of answering brief.	\$1,010	0.3		\$303.00						
	1/27/2023 Healey, Christopher J.	Telephone conference with amicus counsel (AARP) regarding briefing.	\$1,010	0.5		\$505.00						
	2/1/2023 Healey, Christopher J.	Review draft brief from amicus NCLC.	\$1,010	0.6		\$606.00						
		Prepare correspondence to Attorneys Oliver and Wallace regarding same.	\$1,010	0.1		\$101.00						
		Review Attorney Wallace's comments on NCLC amicus and prepare correspondence regarding same.	\$1,010	0.2		\$202.00						
	2/2/2023 Healey, Christopher J.	Review court order regarding briefing schedule.	\$1,010	0.1		\$101.00						
	2/6/2023 Healey, Christopher J.	Review correspondence.	\$1,010	0.1		\$101.00						
	2/6/2023 Healey, Christopher J.	Review as-filed briefs.	\$1	0.1		\$0.05						
	2/6/2023 Healey, Christopher J.	Prepare status correspondence to team.	\$1,010	0.2		\$202.00						
	2/15/2023 Healey, Christopher J.	Review Defendants' request to seal SER documents.	\$1,010	0.1		\$101.00						
	2/15/2023 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$1,010	0.1		\$101.00						
	2/15/2023 Healey, Christopher J.	Follow-up correspondence regarding same.	\$1,010	0.2		\$202.00						
	2/15/2023 Healey, Christopher J.	Review court order regarding prior request.	\$1,010	0.1		\$101.00						
	2/15/2023 Healey, Christopher J.	Draft proposed response regarding sealing issue.	\$1,010	0.5		\$505.00						
	2/16/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Defendants' sealing request.	\$1,010	0.2		\$202.00						
	2/20/2023 Healey, Christopher J.	Draft opposition to Defendants' motion to seal SER.	\$1,010	0.5		\$505.00						
	2/20/2023 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.2		\$202.00						
	2/28/2023 Healey, Christopher J.	Draft response regarding appellate schedule.	\$1,010	0.3		\$303.00						
	2/28/2023 Healey, Christopher J.	Follow-up correspondence regarding same.	\$1,010	0.2		\$202.00						
	3/8/2023 Healey, Christopher J.	Outline settlement proposal.	\$1,010	1		\$1,010.00						
	3/8/2023 Healey, Christopher J.	Prepare correspondence to team regarding settlement call.	\$1,010	0.1		\$101.00						
	3/9/2023 Healey, Christopher J.	Draft correspondence regarding settlement analysis.	\$1,010	1.5		\$1,515.00						
	3/10/2023 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding settlement issues.	\$1,010	0.1		\$101.00						
	3/10/2023 Healey, Christopher J.	Review TransUnion progeny.	\$1,010	0.6		\$606.00						
	3/13/2023 Healey, Christopher J.	Prepare correspondence regarding HSC 1569.70 (levels of care).	\$1,010	0.2		\$202.00						
	3/13/2023 Healey, Christopher J.	Prepare for appellate argument.	\$1,010	1		\$1,010.00						
	3/14/2023 Healey, Christopher J.	Telephone conference with team regarding settlement approach.	\$1,010	0.5		\$505.00		0.5		505.00		
	3/14/2023 Healey, Christopher J.	Follow-up correspondence regarding revised proposal.	\$1,010	0.2		\$202.00						
	3/14/2023 Healey, Christopher J.	Review court notification.	\$1,010	0.1		\$101.00						
	3/15/2023 Healey, Christopher J.	Office conference regarding record.	\$1,010	0.1		\$101.00						
	3/15/2023 Healey, Christopher J.	Review Ninth Circuit in Katie Van.	\$1,010	0.2		\$202.00						
	3/15/2023 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.2		\$202.00						
	3/16/2023 Healey, Christopher J.	Correspondence regarding Katie Van decision.	\$1,010	0.1		\$101.00						
	3/17/2023 Healey, Christopher J.	Review appellate record.	\$1,010	0.1		\$101.00						

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>			
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	3/21/2023 Healey, Christopher J.	Prepare correspondence to team regarding reply brief.	\$1,010	0.1		\$101.00								
	3/21/2023 Healey, Christopher J.	Review Defendants' reply brief and outline responses.	\$1,010	3										
	3/22/2023 Healey, Christopher J.	Correspondence with team regarding Defendants' "no injury" hypos.	\$1,010	0.3		\$303.00								
	3/22/2023 Healey, Christopher J.	Outline responses to Defendants' reply arguments.	\$1,010	0.1		\$101.00								
	3/22/2023 Healey, Christopher J.	Draft responses to Defendants' reply brief.	\$1,010	3		\$3,030.00								
	3/22/2023 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding overpayment theory.	\$1,010	0.2		\$202.00								
	3/23/2023 Healey, Christopher J.	Correspondence regarding reply brief.	\$1,010	0.1		\$101.00								
	3/23/2023 Healey, Christopher J.	Draft responses to Defendants' reply brief.	\$1,010	3.8		\$3,838.00	2	2,020.00						
	3/24/2023 Healey, Christopher J.	Outline responses to Defendants' reply brief.	\$1,010	0.6		\$606.00								
	3/27/2023 Healey, Christopher J.	Outline potential responses to Defendants' reply brief.	\$1,010	0.2		\$202.00								
	3/27/2023 Healey, Christopher J.	Prepare for team call.	\$1,010	0.2		\$202.00								
	3/27/2023 Healey, Christopher J.	Further work on response outline.	\$1,010	0.7		\$707.00								
	3/27/2023 Healey, Christopher J.	Telephone conference with team regarding Defendants' reply brief and oral argument preparation.	\$1,010	1		\$1,010.00			1	1,010.00				
	3/27/2023 Healey, Christopher J.	Correspondence with Attorney Stebner regarding settlement issues.	\$1,010	0.1		\$101.00								
	3/27/2023 Healey, Christopher J.	Draft updated settlement communications.	\$1,010	0.3		\$303.00								
	3/27/2023 Healey, Christopher J.	Draft agenda for team call.	\$1,010	0.2		\$202.00								
	3/27/2023 Healey, Christopher J.	Correspondence with Attorney Wallace regarding standing arguments.	\$1,010	0.2		\$202.00								
	3/27/2023 Healey, Christopher J.	Outline response on "risk of harm" issue.	\$1,010	0.5		\$505.00								
	3/28/2023 Healey, Christopher J.	Review Attorney Wallace's correspondence regarding appellate argument.	\$1,010	0.2		\$202.00								
	3/28/2023 Healey, Christopher J.	Response regarding same.	\$1,010	0.4		\$404.00								
	3/28/2023 Healey, Christopher J.	Research and analysis regarding Defendants' reply arguments.	\$1,010	1.8		\$1,818.00								
	3/28/2023 Healey, Christopher J.	Draft response outline.	\$1,010	2		\$2,020.00								
	3/29/2023 Healey, Christopher J.	Draft response to reply arguments	\$1,010	2.5		\$2,525.00								
	3/30/2023 Healey, Christopher J.	Review Brookdale decision.	\$1,010	0.5		\$505.00								
	3/30/2023 Healey, Christopher J.	Outline to-do/argument regarding same.	\$1,010	0.3		\$303.00								
	3/30/2023 Healey, Christopher J.	Correspondence with Attorney Stebner regarding same.	\$1,010	0.2		\$202.00								
	3/30/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Brookdale order and responses.	\$1,010	0.4		\$404.00								
	3/30/2023 Healey, Christopher J.	Prepare correspondence to Carmen Valero regarding materiality research.	\$1,010	0.2		\$202.00								
	3/30/2023 Healey, Christopher J.	Analysis regarding Brookdale decision and outline responses to same.	\$1,010	2.5		\$2,525.00	1	1,010.00						
	3/31/2023 Healey, Christopher J.	Telephone conference with Attorney Marks regarding Brookdale order and ramification for Sunrise arguments.	\$1,010	0.6		\$606.00								
	3/31/2023 Healey, Christopher J.	Review Ninth Circuit order regarding schedule.	\$1,010	0.1		\$101.00								
	3/31/2023 Healey, Christopher J.	Prepare correspondence regarding Form 32 response.	\$1,010	0.1		\$101.00								
	3/31/2023 Healey, Christopher J.	Analysis and outline regarding response to Brookdale order.	\$1,010	2		\$2,020.00								
	3/31/2023 Valero, Carmen A.	Research 9th Cir/Dist cases discussing reliance/materiality in the context of Article III standing, for C. Healey.	\$360	0.5		\$180.00								
	4/2/2023 Healey, Christopher J.	Review cases regarding Article III standing issues.	\$1,010	2.2		\$2,222.00								
	4/2/2023 Healey, Christopher J.	Review Flynn briefing.	\$1,010	0.5		\$505.00								
	4/3/2023 Healey, Christopher J.	Review Form 32.	\$1,010	0.1		\$101.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/3/2023 Healey, Christopher J.	Research and drafting regarding responses to Sunrise's reply arguments.	\$1,010	3		\$3,030.00									
	4/3/2023 Healey, Christopher J.	Review Defendants' notice regarding Brookdale order.	\$1,010	0.2		\$202.00									
	4/3/2023 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.1		\$101.00									
	4/3/2023 Healey, Christopher J.	Review Attorney Umpierre's spreadsheet regarding evidence.	\$1,010	0.1		\$101.00									
	4/4/2023 Healey, Christopher J.	Outline Rule 28 response.	\$1,010	1.5		\$1,515.00									
	4/4/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Rule 28 response.	\$1,010	0.5		\$505.00									
	4/4/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$1,010	0.3		\$303.00									
	4/4/2023 Healey, Christopher J.	Research and analysis regarding Rule 28 response.	\$1,010	1		\$1,010.00									
	4/4/2023 Healey, Christopher J.	Draft correspondence to Amici counsel regarding Brookdale decision and Rule 28 response.	\$1,010	0.2		\$202.00									
	4/4/2023 Healey, Christopher J.	Review record regarding lack of Article III's injury issues.	\$1,010	0.5		\$505.00									
	4/5/2023 Healey, Christopher J.	Outline and draft response to Stiner decision.	\$1,010	4		\$4,040.00									
	4/6/2023 Healey, Christopher J.	Draft response to Stiner decision.	\$1,010	2.3		\$2,323.00	1	1,010.00							
	4/6/2023 Healey, Christopher J.	Further revisions to response.	\$1,010	0.8		\$808.00									
	4/6/2023 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.1		\$101.00									
	4/7/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding evidence review issues.	\$1,010	0.2		\$202.00									
	4/7/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Sunrise argument and Brookdale response.	\$1,010	0.5		\$505.00									
	4/7/2023 Healey, Christopher J.	Draft email summary of key argument points.	\$1,010	1.5		\$1,515.00									
	4/7/2023 Healey, Christopher J.	Revise Rule 26 response letter.	\$1,010	0.2		\$202.00									
	4/10/2023 Healey, Christopher J.	Review and finalize Rule 26 response letter.	\$1,010	0.2		\$202.00									
	4/10/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Brookdale decision.	\$1,010	0.2		\$202.00									
	4/10/2023 Healey, Christopher J.	Revise Rule 28 response.	\$1,010	0.1		\$101.00									
	4/10/2023 Healey, Christopher J.	Telephone conference with potential witness (Beverly Hills facility).	\$1,010	0.6		\$606.00									
	4/10/2023 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$1,010	0.2		\$202.00									
	4/11/2023 Healey, Christopher J.	Draft argument outline - response to Defendants' reply.	\$1,010	0.6		\$606.00									
	4/11/2023 Healey, Christopher J.	Review TransUnion cases.	\$1,010	0.8		\$808.00									
	4/12/2023 Healey, Christopher J.	Draft argument outline.	\$1,010	1		\$1,010.00									
	4/12/2023 Healey, Christopher J.	Analysis regarding Brookdale decision.	\$1,010	0.8		\$808.00									
	4/12/2023 Healey, Christopher J.	Review Brookdale Rule 23(f) petition.	\$1,010	0.5		\$505.00									
	4/13/2023 Healey, Christopher J.	Draft oral argument outline.	\$1,010	2.4		\$2,424.00									
	4/14/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Watermark subpoena.	\$1,010	0.1		\$101.00									
	4/14/2023 Healey, Christopher J.	Draft oral argument outline.	\$1,010	4.1		\$4,141.00									
	4/15/2023 Healey, Christopher J.	Research regarding consumer survey evidence and related issues.	\$1,010	1.2		\$1,212.00									
	4/17/2023 Healey, Christopher J.	Prepare correspondence regarding consumer survey and related issues.	\$1,010	0.5		\$505.00									
	4/17/2023 Healey, Christopher J.	Analysis regarding consumer survey and related issues.	\$1,010	2		\$2,020.00									
	4/17/2023 Healey, Christopher J.	Draft oral argument outline.	\$1,010	0.5		\$505.00									
	4/17/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding consumer survey case.	\$1,010	0.3		\$303.00									
	4/18/2023 Healey, Christopher J.	Analysis regarding consumer survey and related issues.	\$1,010	2.5		\$2,525.00									
	4/18/2023 Healey, Christopher J.	Draft argument section of survey and related points.	\$1,010	1		\$1,010.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/19/2023 Healey, Christopher J.	Draft argument section regarding survey evidence and related issues.	\$1,010	1.2		\$1,212.00									
	4/20/2023 Healey, Christopher J.	Analysis regarding expert qualification evidence and related issues.	\$1,010	2.7		\$2,727.00									
	4/20/2023 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$1,010	0.5		\$505.00									
	4/21/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding appellant's argument issues.	\$1,010	0.2		\$202.00									
	4/21/2023 Healey, Christopher J.	Analysis regarding expert value quantification issues.	\$1,010	2		\$2,020.00									
	4/24/2023 Healey, Christopher J.	Analysis regarding expert quantification issue.	\$1,010	3.2		\$3,232.00	1	1,010.00							
	4/25/2023 Healey, Christopher J.	Draft response to Defendants' arguments on expert value quantification issue.	\$1,010	2.6		\$2,626.00	1	1,010.00							
	4/25/2023 Healey, Christopher J.	Research regarding appellate waiver issue.	\$1,010	0.5		\$505.00									
	4/26/2023 Healey, Christopher J.	Review Stiner Rule 23(f) opposition.	\$1,010	0.2		\$202.00									
	4/26/2023 Healey, Christopher J.	Draft outline responding to Defendants' appellate argument.	\$1,010	3.5		\$3,535.00									
	4/27/2023 Healey, Christopher J.	Prepare correspondence to team regarding defense arguments regarding Hinojos.	\$1,010	1.5		\$1,515.00									
	4/27/2023 Healey, Christopher J.	Update TransUnion case check.	\$1,010	0.5		\$505.00									
	4/27/2023 Healey, Christopher J.	Analysis regarding Hinojos arguments.	\$1,010	1		\$1,010.00									
	4/27/2023 Valero, Carmen A.	Research 9th Circuit authorities discussing whether plaintiff must provide expert or other proof to quantify claimed economic harm to satisfy Article III, for C. Healey.	\$360	2		\$720.00									
	4/28/2023 Healey, Christopher J.	Review Carmen Valero's research regarding Article III/consumer surveys.	\$1,010	0.3		\$303.00									
	4/28/2023 Healey, Christopher J.	File correspondence regarding appellate review issue.	\$1,010	0.2		\$202.00									
	4/30/2023 Healey, Christopher J.	Review Ninth Circuit caselaw regarding consumer survey, expert quantification issues.	\$1,010	2		\$2,020.00									
	5/1/2023 Healey, Christopher J.	Review consumer survey caselaw.	\$1,010	2.4		\$2,424.00									
	5/1/2023 Healey, Christopher J.	Draft correspondence regarding same.	\$1,010	0.5		\$505.00									
	5/1/2023 Healey, Christopher J.	Review Court's notice regarding hearing date and related court information.	\$1,010	0.2		\$202.00									
	5/1/2023 Healey, Christopher J.	Office conference regarding hearing logistics.	\$1,010	0.1		\$101.00									
	5/1/2023 Healey, Christopher J.	Review Bowerman decisions.	\$1,010	0.5		\$505.00									
	5/2/2023 Healey, Christopher J.	Draft correspondence regarding consumer survey/expert quantification evidence.	\$1,010	5		\$5,050.00									
	5/3/2023 Healey, Christopher J.	Revise memorandum regarding expert value quantification issues.	\$1,010	3.5		\$3,535.00	1	1,010.00							
	5/3/2023 Healey, Christopher J.	Prepare correspondence to team regarding case schedule.	\$1,010	0.2		\$202.00									
	5/3/2023 Healey, Christopher J.	Prepare correspondence regarding expert evidence memorandum.	\$1,010	0.2		\$202.00									
	5/3/2023 Healey, Christopher J.	Correspondence with Attorney Wallace regarding Sunrise's waiver issues.	\$1,010	0.5		\$505.00									
	5/4/2023 Healey, Christopher J.	Draft argument outline.	\$1,010	3.5		\$3,535.00									
	5/6/2023 Healey, Christopher J.	Prepare correspondence to team regarding potential Sunrise waiver.	\$1,010	0.7		\$707.00									
	5/6/2023 Healey, Christopher J.	Draft argument outline.	\$1,010	1.8		\$1,818.00									
	5/11/2023 Healey, Christopher J.	Prepare correspondence regarding moot court argument.	\$1,010	0.1		\$101.00									
	5/11/2023 Healey, Christopher J.	Draft response to Sunrise's reply arguments.	\$1,010	2.5		\$2,525.00									
	5/12/2023 Healey, Christopher J.	Draft response to Sunrise's reply arguments.	\$1,010	3		\$3,030.00									

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	5/12/2023 Valero, Carmen A.	Research and retrieve PDFs of multiple Williston and Restatement sections, for C. Healey.	\$360	0.3	\$108.00								
	5/14/2023 Healey, Christopher J.	Review Williston/restatement excerpts regarding reliance.	\$1,010	0.5	\$505.00								
	5/15/2023 Healey, Christopher J.	Draft response to Sunrise's reply arguments.	\$1,010	2.8	\$2,828.00								
	5/16/2023 Healey, Christopher J.	Draft responses to Sunrise reply.	\$1,010	5	\$5,050.00								
	5/17/2023 Healey, Christopher J.	Draft responses to Sunrise reply.	\$1,010	3.7	\$3,737.00	1	1,010.00						
	5/18/2023 Healey, Christopher J.	Draft responses to Sunrise reply.	\$1,010	3.2	\$3,232.00								
	5/18/2023 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding record support.	\$1,010	0.2	\$202.00								
	5/19/2023 Healey, Christopher J.	Draft response to Sunrise reply.	\$1,010	2	\$2,020.00								
	5/20/2023 Healey, Christopher J.	Draft response to Sunrise reply.	\$1,010	2	\$2,020.00								
	5/21/2023 Healey, Christopher J.	Draft response to Defendants' reply.	\$1,010	3.5	\$3,535.00	1	1,010.00						
	5/21/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding argument.	\$1,010	0.5	\$505.00								
	5/22/2023 Healey, Christopher J.	Draft response to Defendants' reply brief.	\$1,010	3.5	\$3,535.00								
	5/23/2023 Healey, Christopher J.	Draft response to Defendants' reply brief.	\$1,010	4	\$4,040.00								
	5/23/2023 Healey, Christopher J.	Review and respond to Attorney Wallace's analysis regarding consumer survey evidence.	\$1,010	0.2	\$202.00								
	5/24/2023 Healey, Christopher J.	Revise response to Defendants' reply.	\$1,010	3.5	\$3,535.00								
	5/24/2023 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.1	\$101.00								
	5/24/2023 Healey, Christopher J.	Prepare correspondence regarding opening outline.	\$1,010	0.1	\$101.00								
	5/25/2023 Healey, Christopher J.	Draft opening affirmative argument points.	\$1,010	6.5	\$6,565.00								
	5/25/2023 Healey, Christopher J.	Prepare correspondence to team regarding argument summary.	\$1,010	0.1	\$101.00								
	5/25/2023 Healey, Christopher J.	Telephone conference with Attorney Warren regarding same.	\$1,010	0.2	\$202.00								
	5/26/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding affirmative argument and revision.	\$1,010	1.6	\$1,616.00								
	5/26/2023 Healey, Christopher J.	Outline revisions to affirmative argument.	\$1,010	0.4	\$404.00								
	5/27/2023 Healey, Christopher J.	Revise affirmative argument.	\$1,010	3.2	\$3,232.00	1	1,010.00						
	5/28/2023 Healey, Christopher J.	Prepare for moot court presentation.	\$1,010	1.4	\$1,414.00								
	5/29/2023 Healey, Christopher J.	Prepare for moot court presentation.	\$1,010	4.7	\$4,747.00	1	1,010.00						
	5/30/2023 Healey, Christopher J.	Prepare for oral argument.	\$1,010	2	\$2,020.00								
	5/30/2023 Healey, Christopher J.	Telephone conference with team regarding moot court for appellate argument.	\$1,010	1.2	\$1,212.00								
	5/30/2023 Healey, Christopher J.	Revise affirmative argument statement.	\$1,010	1.2	\$1,212.00					1.2	1,212.00		
	5/30/2023 Healey, Christopher J.	Review Attorney Oliver comments re draft brief, proposed questions/answers.	\$1,010	0.2	\$202.00								
	5/30/2023 Healey, Christopher J.	Follow-up calls regarding oral argument preparation.	\$1,010	0.4	\$404.00								
	5/30/2023 Healey, Christopher J.	Review Kwikset decisions and prepare correspondence regarding same.	\$1,010	0.5	\$505.00								
	5/31/2023 Healey, Christopher J.	Review and analysis regarding Kwikset and progeny.	\$1,010	1	\$1,010.00								
	5/31/2023 Healey, Christopher J.	Prepare for oral argument.	\$1,010	3.4	\$3,434.00								
	6/1/2023 Healey, Christopher J.	Outline revisions to affirmative argument.	\$1,010	1	\$1,010.00								
	6/1/2023 Healey, Christopher J.	Prepare correspondence to team regarding Nguyen performance/systemic defect issue.	\$1,010	0.2	\$202.00								
	6/1/2023 Healey, Christopher J.	Continue review of affirmative argument.	\$1,010	1	\$1,010.00								
	6/1/2023 Healey, Christopher J.	Prepare for oral argument.	\$1,010	0.5	\$505.00								
	6/1/2023 Healey, Christopher J.	Review Wolin and progeny.	\$1,010	0.5	\$505.00								
	6/2/2023 Healey, Christopher J.	Prepare for second moot court session.	\$1,010	2	\$2,020.00								
	6/2/2023 Healey, Christopher J.	Analysis regarding Article III injury tests.	\$1,010	1	\$1,010.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>	<u>Fees</u>	<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>		
	6/2/2023 Healey, Christopher J.	Review TransUnion citation.	\$1,010	0.5	\$505.00										
	6/2/2023 Healey, Christopher J.	Review Olean district court order.	\$1,010	0.1	\$101.00										
	6/3/2023 Healey, Christopher J.	Prepare for second moot court session.	\$1,010	2.5	\$2,525.00										
	6/3/2023 Healey, Christopher J.	Outline response arguments.	\$1,010	2	\$2,020.00										
	6/4/2023 Healey, Christopher J.	Revise opening appellate argument.	\$1,010	1.3	\$1,313.00										
	6/5/2023 Healey, Christopher J.	Prepare for second moot court session.	\$1,010	2.5	\$2,525.00										
	6/5/2023 Healey, Christopher J.	Revise affirmative argument.	\$1,010	2	\$2,020.00										
	6/6/2023 Healey, Christopher J.	Prepare for second moot court session.	\$1,010	1	\$1,010.00										
	6/6/2023 Healey, Christopher J.	Revise opening argument.	\$1,010	1	\$1,010.00										
	6/6/2023 Healey, Christopher J.	Telephone moot court session with team.	\$1,010	1	\$1,010.00						1	1,010.00			
	6/6/2023 Healey, Christopher J.	Outline follow-up points.	\$1,010	0.3	\$303.00										
	6/7/2023 Healey, Christopher J.	Revise/tighten affirmative argument.	\$1,010	3.5	\$3,535.00			1	1,010.00						
	6/7/2023 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding same.	\$1,010	0.1	\$101.00										
	6/7/2023 Healey, Christopher J.	Correspondence with Attorney Wallace regarding quantification issue.	\$1,010	0.1	\$101.00										
	6/12/2023 Healey, Christopher J.	Prepare for moot court session.	\$1,010	1.3	\$1,313.00										
	6/12/2023 Healey, Christopher J.	Revise affirmative argument.	\$1,010	1	\$1,010.00										
	6/12/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding oral argument preparation.	\$1,010	0.3	\$303.00										
	6/12/2023 Healey, Christopher J.	Telephone message to Attorney Umpierre regarding shortfall evidence.	\$1,010	0.1	\$101.00										
	6/13/2023 Healey, Christopher J.	Prepare for moot court session.	\$1,010	2	\$2,020.00										
	6/13/2023 Healey, Christopher J.	Revise argument outline.	\$1,010	2	\$2,020.00										
	6/14/2023 Healey, Christopher J.	Prepare for moot court session.	\$1,010	2.3	\$2,323.00										
	6/14/2023 Healey, Christopher J.	Attend moot court session.	\$1,010	1.5	\$1,515.00										
	6/14/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding argument preparation.	\$1,010	0.5	\$505.00										
	6/14/2023 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding Sunrise seal motion.	\$1,010	0.1	\$101.00										
	6/14/2023 Healey, Christopher J.	Prepare correspondence to Attorneys Wallace and Oliver regarding Clevenger test.	\$1,010	0.2	\$202.00										
	6/14/2023 Healey, Christopher J.	Outline to-do points for argument.	\$1,010	0.3	\$303.00										
	6/14/2023 Healey, Christopher J.	Revise questions/answers.	\$1,010	0.5	\$505.00										
	6/15/2023 Healey, Christopher J.	Organize appellate argument materials.	\$1,010	0.5	\$505.00										
	6/15/2023 Healey, Christopher J.	Prepare for 6/20 moot session.	\$1,010	3	\$3,030.00										
	6/15/2023 Healey, Christopher J.	Prepare correspondence regarding Hinojos follow-up.	\$1,010	0.2	\$202.00										
	6/16/2023 Healey, Christopher J.	Record review.	\$1,010	3	\$3,030.00										
	6/16/2023 Healey, Christopher J.	Prepare for 6/20 moot session.	\$1,010	0.4	\$404.00										
	6/16/2023 Valero, Carmen A.	Research enactment date of 22 CCR 87411(a), for C. Healey.	\$360	0.5	\$180.00										
	6/17/2023 Healey, Christopher J.	Review record.	\$1,010	3.5	\$3,535.00			1	1,010.00						
	6/17/2023 Healey, Christopher J.	Prepare for moot court session.	\$1,010	1	\$1,010.00										
	6/17/2023 Healey, Christopher J.	Correspondence with Attorney Wallace regarding argument.	\$1,010	0.2	\$202.00										
	6/18/2023 Healey, Christopher J.	Review record.	\$1,010	2.5	\$2,525.00										
	6/18/2023 Healey, Christopher J.	Prepare for moot court session.	\$1,010	0.5	\$2,525.00										
	6/19/2023 Healey, Christopher J.	Prepare for moot court session.	\$1,010	2.8	\$2,828.00			1	1,010.00						
	6/20/2023 Healey, Christopher J.	Travel to Oakland to moot session.	\$1,010	1	\$1,010.00									1	1,010.00
	6/20/2023 Healey, Christopher J.	Prepare for moot session.	\$1,010	1	\$1,010.00										
	6/20/2023 Healey, Christopher J.	Attend moot session.	\$1,010	2	\$2,020.00										
	6/20/2023 Healey, Christopher J.	Prepare to-do list.	\$1,010	0.5	\$505.00										

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	6/20/2023 Healey, Christopher J.	Return travel from moot session.	\$1,010	2		\$2,020.00								
	6/21/2023 Healey, Christopher J.	Review correspondence regarding oral argument preparation.	\$1,010	0.5		\$505.00								
	6/21/2023 Healey, Christopher J.	Revise affirmative argument.	\$1,010	1		\$1,010.00								
	6/22/2023 Healey, Christopher J.	Revise argument outline.	\$1,010	1.5		\$1,515.00								
	6/22/2023 Healey, Christopher J.	Prepare for oral argument.	\$1,010	1		\$1,010.00								
	6/22/2023 Healey, Christopher J.	Review and analysis regarding CLRA damage requirements.	\$1,010	0.5		\$505.00								
	6/23/2023 Healey, Christopher J.	Revise argument outline.	\$1,010	2		\$2,020.00								
	6/23/2023 Healey, Christopher J.	Prepare for oral argument.	\$1,010	0.7		\$707.00								
	6/23/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding oral argument.	\$1,010	0.2		\$202.00								
	6/25/2023 Healey, Christopher J.	Revise argument outline.	\$1,010	1		\$1,010.00								
	6/25/2023 Healey, Christopher J.	Review record.	\$1,010	2.4		\$2,424.00								
	6/26/2023 Healey, Christopher J.	Draft key question/answer points; revise same.	\$1,010	2.5		\$2,525.00								
	6/26/2023 Healey, Christopher J.	Prepare for oral argument.	\$1,010	2		\$2,020.00								
	6/27/2023 Healey, Christopher J.	Revise key questions/answers.	\$1,010	3.2		\$3,232.00	1	1,010.00						
	6/27/2023 Healey, Christopher J.	Prepare for oral argument.	\$1,010	1.5		\$1,515.00								
	6/27/2023 Healey, Christopher J.	Review record.	\$1,010	1.5		\$1,515.00								
	6/28/2023 Healey, Christopher J.	Record review.	\$1,010	1		\$1,010.00								
	6/28/2023 Healey, Christopher J.	Update TransUnion citations.	\$1,010	0.5		\$505.00								
	6/28/2023 Healey, Christopher J.	Further record review and further question/answer responses.	\$1,010	2		\$2,020.00								
	6/29/2023 Healey, Christopher J.	Record review.	\$1,010	1.5		\$1,515.00								
	6/29/2023 Healey, Christopher J.	Further question/answer on key issues.	\$1,010	1		\$1,010.00								
	6/29/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding record issues.	\$1,010	0.1		\$101.00								
	6/30/2023 Healey, Christopher J.	Review record.	\$1,010	0.5		\$505.00								
	6/30/2023 Healey, Christopher J.	Review and outline record.	\$1,010	3.7		\$3,737.00								
	6/30/2023 Healey, Christopher J.	Prepare for oral argument.	\$1,010	1.2		\$1,212.00								
	7/1/2023 Healey, Christopher J.	Review Happy Resident declarations.	\$1,010	1.8		\$1,818.00								
	7/1/2023 Healey, Christopher J.	Revise questions/answers on Happy Residents.	\$1,010	0.3		\$303.00								
	7/1/2023 Healey, Christopher J.	Review record.	\$1,010	3		\$3,030.00								
	7/2/2023 Healey, Christopher J.	Analyses regarding other payor and related issues.	\$1,010	3		\$3,030.00								
	7/2/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$1,010	0.3		\$303.00								
	7/2/2023 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.2		\$202.00								
	7/3/2023 Healey, Christopher J.	Prepare for oral argument.	\$1,010	1.7		\$1,717.00								
	7/3/2023 Healey, Christopher J.	Review panel assignment.	\$1,010	0.1		\$101.00								
	7/3/2023 Healey, Christopher J.	Research regarding panel members and review prior decisions.	\$1,010	2		\$2,020.00								
	7/3/2023 Healey, Christopher J.	Correspondence with team regarding panel.	\$1,010	0.2		\$202.00								
	7/3/2023 Healey, Christopher J.	Correspondence regarding other payor issue.	\$1,010	0.2		\$202.00								
	7/3/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding other payor issue.	\$1,010	0.2		\$202.00								
	7/3/2023 Healey, Christopher J.	Conduct legal research to obtain case law on various topics issued by Ninth Circuit judges James Donato, Salvador Mendoza and Gabriel Sanchez, at the request of Christopher Healey.	\$400	1		\$400.00	1	400						
	7/4/2023 Healey, Christopher J.	Review correspondence regarding panel.	\$1,010	0.2		\$202.00								
	7/4/2023 Healey, Christopher J.	Prepare for oral argument.	\$1,010	0.5		\$505.00								
	7/4/2023 Healey, Christopher J.	Review Attorney Wallace's comments regarding argument outline.	\$1,010	0.2		\$202.00								
	7/4/2023 Healey, Christopher J.	Revise argument outline.	\$1,010	1.3		\$1,313.00								
	7/4/2023 Healey, Christopher J.	Review prior decision by panel.	\$1,010	0.5		\$505.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	7/5/2023 Healey, Christopher J.	Correspondence with team regarding panel decisions.	\$1,010	0.2	\$202.00								
	7/5/2023 Healey, Christopher J.	Review prior decisions by panel.	\$1,010	1.2	\$1,212.00								
	7/5/2023 Healey, Christopher J.	Revise questions/answers for hearing.	\$1,010	2.2	\$2,222.00								
	7/5/2023 Healey, Christopher J.	Conference regarding hearing preparation.	\$1,010	0.1	\$101.00								
	7/5/2023 Valero, Carmen A.	Research primary/secondary sources re: if a contract specifies one party as the obligor, payments received are presumed to have been paid by the obligor for C. Healey.	\$360	1	\$360.00								
	7/6/2023 Healey, Christopher J.	Revise argument outline.	\$1,010	1.5	\$1,515.00								
	7/6/2023 Healey, Christopher J.	Review panelist decisions.	\$1,010	2.8	\$2,828.00	1	1,010.00						
	7/6/2023 Healey, Christopher J.	Correspondence regarding hearing preparation.	\$1,010	0.3	\$303.00								
	7/6/2023 Healey, Christopher J.	Review Attorney Wallace's revisions to questions/answers.	\$1,010	0.2	\$202.00								
	7/6/2023 Healey, Christopher J.	Review cases from panelists.	\$1,010	0.5	\$505.00								
	7/7/2023 Healey, Christopher J.	Review panelist decisions.	\$1,010	0.9	\$909.00								
	7/7/2023 Healey, Christopher J.	Correspondence regarding hearing preparation.	\$1,010	0.1	\$101.00								
	7/7/2023 Healey, Christopher J.	Telephone conference with team regarding hearing preparation.	\$1,010	0.5	\$505.00			0.5	505.00				
	7/7/2023 Healey, Christopher J.	Prepare for oral argument.	\$1,010	3.7	\$3,737.00								
	7/8/2023 Healey, Christopher J.	Prepare for oral argument.	\$1,010	3.5	\$3,535.00								
	7/9/2023 Healey, Christopher J.	Prepare for oral argument.	\$1,010	3.5	\$3,535.00								
	7/10/2023 Healey, Christopher J.	Prepare for oral argument.	\$1,010	5	\$5,050.00	4	4,040.00						
	7/10/2023 Healey, Christopher J.	Travel to Pasadena for argument.	\$1,010	3	\$3,030.00							3	3,030.00
	7/10/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding argument.	\$1,010	0.8	\$808.00								
	7/11/2023 Healey, Christopher J.	Prepare for oral argument.	\$1,010	2	\$2,020.00								
	7/11/2023 Healey, Christopher J.	Attend oral argument.	\$1,010	3	\$3,030.00								
	7/11/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding argument and status.	\$1,010	0.5	\$505.00								
	7/11/2023 Healey, Christopher J.	Return travel from Pasadena.	\$1,010	2.5	\$2,525.00							2.5	2,525.00
	7/12/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding unsealing issues.	\$1,010	0.2	\$202.00								
	7/12/2023 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.2	\$202.00								
	7/14/2023 Healey, Christopher J.	Review and analyze Sunrise Rule 28(j) letter regarding Dinerstein case.	\$1,010	1.5	\$1,515.00								
	7/16/2023 Healey, Christopher J.	Draft response to Sunrise's Rule 28(j) [Dinerstein] letter.	\$1,010	1	\$1,010.00								
	7/17/2023 Healey, Christopher J.	Draft response to Sunrise's Rule 28(j) letter on Dinerstein decision.	\$1,010	2.3	\$2,323.00								
	7/17/2023 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.2	\$202.00								
	7/18/2023 Healey, Christopher J.	Revise Rule 28(j) response letter.	\$1,010	1	\$1,010.00								
	7/18/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding same.	\$1,010	0.1	\$101.00								
	7/18/2023 Healey, Christopher J.	Review Cal Medical Association decision regarding Kwikset rule.	\$1,010	0.2	\$202.00								
	7/20/2023 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding outstanding discovery issues.	\$1,010	0.2	\$202.00								
	7/21/2023 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding settlement issues.	\$1,010	0.3	\$303.00								
	7/21/2023 Healey, Christopher J.	Correspondence with team regarding settlement call and Sunrise's financial status.	\$1,010	0.3	\$303.00								
	7/24/2023 Valero, Carmen A.	Research Sunrise and related entities' financial status, for C. Healey.	\$360	0.4	\$144.00								
	7/25/2023 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding settlement/damage issues.	\$1,010	0.1	\$101.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/27/2023 Healey, Christopher J.	Status report to contingency committee.	\$1,010	0.2		\$202.00									
	7/31/2023 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding Lee settlement call.	\$1,010	0.2		\$202.00									
	7/31/2023 Healey, Christopher J.	Prepare correspondence to team regarding settlement status and options.	\$1,010	0.5		\$505.00									
	8/1/2023 Healey, Christopher J.	Correspondence regarding settlement issues.	\$1,010	0.1		\$101.00									
	8/2/2023 Healey, Christopher J.	Review Ninth Circuit decision affirming class certification order.	\$1,010	0.3		\$303.00									
	8/2/2023 Healey, Christopher J.	Status correspondence to team.	\$1,010	0.3		\$303.00									
	8/2/2023 Healey, Christopher J.	Status correspondence to firm contingency committee.	\$1,010	0.2		\$202.00	0.2	202.00							
	8/2/2023 Healey, Christopher J.	Prepare correspondence to mediator Kaplan regarding status.	\$1,010	0.2		\$202.00									
	8/2/2023 Healey, Christopher J.	Correspondence regarding media inquiry regarding appellate decision.	\$1,010	0.2		\$202.00									
	8/2/2023 Healey, Christopher J.	Analysis and document review regarding Pre-Move In monthly fee damages.	\$1,010	0.5		\$505.00									
	8/2/2023 Healey, Christopher J.	Draft correspondence regarding same.	\$1,010	0.5		\$505.00									
	8/3/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding monthly fee claim.	\$1,010	0.2		\$202.00									
	8/3/2023 Healey, Christopher J.	Outline to-do list.	\$1,010	0.2		\$202.00									
	8/3/2023 Healey, Christopher J.	Review AARP inquiry regarding publication request.	\$1,010	0.1		\$101.00									
	8/3/2023 Healey, Christopher J.	Correspondence with team regarding same.	\$1,010	0.2		\$202.00									
	8/3/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding same.	\$1,010	0.1		\$101.00									
	8/3/2023 Healey, Christopher J.	Draft response to AARP regarding publication request.	\$1,010	0.3		\$303.00									
	8/3/2023 Healey, Christopher J.	Revise AARP response.	\$1,010	0.1		\$101.00									
	8/4/2023 Healey, Christopher J.	Correspondence regarding Brookdale arguments.	\$1,010	0.2		\$202.00									
	8/4/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding same.	\$1,010	0.2		\$202.00									
	8/7/2023 Healey, Christopher J.	Review Attorney Umpierre's correspondence regarding monthly fee claim.	\$1,010	0.1		\$101.00									
	8/7/2023 Healey, Christopher J.	Response regarding potential offset issue.	\$1,010	0.3		\$303.00									
	8/9/2023 Healey, Christopher J.	Review Attorney Umpierre's correspondence regarding monthly fee claim.	\$1,010	0.1		\$101.00									
	8/9/2023 Healey, Christopher J.	Follow-up analysis regarding same.	\$1,010	0.1		\$101.00									
	8/14/2023 Healey, Christopher J.	Prepare to-do correspondence.	\$1,010	0.1		\$101.00									
	8/15/2023 Healey, Christopher J.	Telephone message exchanges with mediator Kaplan.	\$1,010	0.2		\$202.00									
	8/17/2023 Healey, Christopher J.	Correspondence regarding case status and to-do issues.	\$1,010	0.2		\$202.00									
	8/17/2023 Healey, Christopher J.	Review FRAP rules regarding mandate timing, etc.	\$1,010	0.2		\$202.00									
	8/17/2023 Healey, Christopher J.	Prepare correspondence to expert Kennedy regarding case status.	\$1,010	0.2		\$202.00									
	8/18/2023 Healey, Christopher J.	Correspondence with expert Kennedy's office regarding preparation meeting.	\$1,010	0.1		\$101.00									
	8/18/2023 Healey, Christopher J.	Outline to-do list.	\$1,010	0.1		\$101.00									
	8/21/2023 Healey, Christopher J.	Review prior case scheduling order, meet and confer correspondence.	\$1,010	1		\$1,010.00									
	8/21/2023 Healey, Christopher J.	Outline to-do list.	\$1,010	0.8		\$808.00									
	8/21/2023 Healey, Christopher J.	Outline proposed case schedule.	\$1,010	1		\$1,010.00									
	8/21/2023 Healey, Christopher J.	Correspondence with Kennedy's office regarding prep call.	\$1,010	0.1		\$101.00									
	8/21/2023 Healey, Christopher J.	Prepare correspondence to Attorneys Wallace and Umpierre regarding draft case schedule.	\$1,010	0.2		\$202.00									
	8/22/2023 Healey, Christopher J.	Correspondence regarding Kennedy preparation.	\$1,010	0.1		\$101.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
		Correspondence regarding research assistance on other payors issue.	\$1,010	0.1		\$101.00									
	8/22/2023 Healey, Christopher J.	Review files regarding trial preparation notes.	\$1,010	0.1		\$101.00									
	8/22/2023 Healey, Christopher J.	Review and analysis regarding draft discovery/schedule letter.	\$1,010	0.3		\$303.00									
	8/22/2023 Healey, Christopher J.	Prepare for meeting regarding other payor issue.	\$1,010	0.4		\$404.00									
	8/22/2023 Healey, Christopher J.	Meet with Attorney Lehman regarding other payor issue.	\$1,010	0.5		\$505.00									
	8/22/2023 Healey, Christopher J.	Follow-up correspondence regarding other payors analysis.	\$1,010	0.3		\$303.00									
	8/22/2023 Healey, Christopher J.	Prepare for call regarding case schedule/discovery issues.	\$1,010	0.8		\$808.00									
	8/22/2023 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding settlement.	\$1,010	0.1		\$101.00									
	8/22/2023 Healey, Christopher J.	Follow-up correspondence regarding same.	\$1,010	0.2		\$202.00									
	8/22/2023 Lehman, Carl J.	Conference with C. Healey regarding research project relating to Article III standing and class certification issues.	\$520	0.1		\$52.00									
	8/22/2023 Lehman, Carl J.	Begin review of case documents.	\$520	0.6		\$312.00									
	8/23/2023 Healey, Christopher J.	Correspondence regarding mediation and related issues.	\$1,010	0.3		\$303.00									
	8/23/2023 Healey, Christopher J.	Revise meet and confer letter regarding discovery, class notice.	\$1,010	2		\$2,020.00									
	8/23/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$1,010	0.2		\$202.00									
	8/23/2023 Healey, Christopher J.	Office conference regarding financial elder abuse statute.	\$1,010	0.1		\$101.00									
	8/23/2023 Healey, Christopher J.	Prepare for call with expert Kennedy.	\$1,010	1		\$1,010.00									
	8/23/2023 Healey, Christopher J.	Correspondence to Attorney Umpierre regarding same.	\$1,010	0.2		\$202.00									
	8/23/2023 Lehman, Carl J.	Review and sign stipulated protective order.	\$520	0.2		\$104.00									
	8/23/2023 Lehman, Carl J.	Continue review of relevant case documents and cases identified by C. Valero.	\$520	0.9		\$468.00									
	8/24/2023 Healey, Christopher J.	Telephone conference with Attorney Yarnell regarding status and discovery.	\$1,010	0.2		\$202.00									
	8/24/2023 Healey, Christopher J.	Prepare for Kennedy call.	\$1,010	0.2		\$202.00									
	8/24/2023 Healey, Christopher J.	Telephone conference with Kennedy regarding case status and damages analysis.	\$1,010	0.5		\$505.00									
	8/24/2023 Healey, Christopher J.	Prepare correspondence to team regarding case status, to-do issues and mandate status.	\$1,010	0.8		\$808.00									
	8/24/2023 Healey, Christopher J.	Prepare correspondence regarding Kennedy call.	\$1,010	0.3		\$303.00									
	8/24/2023 Healey, Christopher J.	Status report to team.	\$1,010	0.2		\$202.00									
	8/24/2023 Healey, Christopher J.	Revise case schedule and to-do list.	\$1,010	0.4		\$404.00									
	8/24/2023 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding settlement status.	\$1,010	0.1		\$101.00									
	8/25/2023 Healey, Christopher J.	Outline trial proof matrix.	\$1,010	1.7		\$1,717.00									
	8/25/2023 Lehman, Carl J.	Continue review of relevant case documents and cases identified by C. Valero.	\$520	0.7		\$364.00									
	8/25/2023 Lehman, Carl J.	Begin research regarding Article III and class certification issues.	\$520	0.8		\$416.00									
	8/28/2023 Healey, Christopher J.	Prepare for Attorney Mark's' call.	\$1,010	0.3		\$303.00									
	8/28/2023 Healey, Christopher J.	Telephone conference with Attorney Marks regarding discovery and trial preparation.	\$1,010	0.6		\$606.00									
	8/28/2023 Healey, Christopher J.	Review Kirkland decision regarding trial subpoena issue.	\$1,010	0.3		\$303.00									
	8/28/2023 Healey, Christopher J.	Prepare correspondence regarding same.	\$1,010	0.2		\$202.00									
	8/28/2023 Healey, Christopher J.	Prepare correspondence to team regarding staffing data issues.	\$1,010	0.3		\$303.00									
	8/28/2023 Healey, Christopher J.	Revise trial proof outline.	\$1,010	2.2		\$2,222.00									
	8/28/2023 Valero, Carmen A.	Research public records to confirm current residential address of Jeff Slichta, for C. Healey.	\$360	0.1		\$36.00									

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	8/29/2023 Healey, Christopher J.	Correspondence with Attorneys Thamer and Martin regarding trial preparation meeting.	\$1,010	0.1	\$101.00								
	8/29/2023 Healey, Christopher J.	Draft trial proof matrix.	\$1,010	2.5	\$2,525.00	1.25	1262.5						
	8/29/2023 Healey, Christopher J.	Analysis regarding judicial admissions.	\$1,010	1	\$1,010.00								
	8/29/2023 Lehman, Carl J.	Continue to review relevant case documents and research issues regarding Article III standing and class certification issues.	\$520	1.4	\$728.00								
	8/30/2023 Healey, Christopher J.	Prepare correspondence to C. Valero regarding declaration evidence issue.	\$1,010	0.2	\$202.00								
	8/30/2023 Healey, Christopher J.	Research and analysis regarding FRT 804.	\$1,010	0.8	\$808.00								
	8/30/2023 Maddry, Mica	Conduct retrieval of two filings from a Stiner v. Brookdale Senior Living case for Carl Lehman.	\$375	0.3	\$112.50	0.3	112.5						
	8/30/2023 Lehman, Carl J.	Continue research and analysis regarding Article III issues and issues with respect to class certification.	\$520	1.3	\$676.00								
	8/31/2023 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding trial preparation planning.	\$1,010	0.2	\$202.00								
	8/31/2023 Healey, Christopher J.	Draft trial proof matrix.	\$1,010	2.4	\$2,424.00								
	9/1/2023 Healey, Christopher J.	Revise trial proof matrix.	\$1,010	2.5	\$2,525.00	1	1,010.00						
	9/4/2023 Healey, Christopher J.	Correspondence to Attorney Thamer regarding trial prep.	\$1,010	0.1	\$101.00								
	9/4/2023 Healey, Christopher J.	Correspondence to team regarding to do items.	\$1,010	0.2	\$202.00								
	9/4/2023 Healey, Christopher J.	File correspondence regarding trial prep.	\$1,010	0.1	\$101.00								
	9/5/2023 Healey, Christopher J.	Correspondence regarding trial prep meeting.	\$1,010	0.3	\$303.00								
	9/5/2023 Healey, Christopher J.	Review Attorney Umpierre correspondence regarding class notice and discovery.	\$1,010	0.1	\$101.00								
	9/5/2023 Healey, Christopher J.	Revise trial proof matrix.	\$1,010	2	\$2,020.00								
	9/5/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding case status.	\$1,010	0.3	\$303.00								
	9/5/2023 Healey, Christopher J.	Analysis regarding trial custodian issue.	\$1,010	0.5	\$505.00								
	9/5/2023 Healey, Christopher J.	Review leg history re Elder Financial Abuse statute.	\$1,010	0.2	\$202.00								
	9/6/2023 Healey, Christopher J.	Correspondence with team regarding class notice issues.	\$1,010	0.3	\$303.00								
	9/6/2023 Healey, Christopher J.	Outline revisions to trial proof matrix.	\$1,010	0.3	\$303.00								
	9/6/2023 Healey, Christopher J.	Office conference with Attorney Lehman regarding other payors research issue.	\$1,010	0.5	\$505.00								
	9/6/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Other Payors issue.	\$1,010	0.3	\$303.00								
	9/6/2023 Healey, Christopher J.	Review file regarding refund and related documentation to support other payor position.	\$1,010	1.4	\$1,414.00								
	9/6/2023 Healey, Christopher J.	Correspondence to Attorney Chicotel (CANHR) regarding other payor issue.	\$1,010	0.2	\$202.00								
	9/6/2023 Lehman, Carl J.	Further research and analysis regarding class certification issues.	\$520	1.5	\$780.00								
	9/6/2023 Lehman, Carl J.	Conference with C. Healey regarding research findings.	\$520	0.5	\$260.00								
	9/7/2023 Healey, Christopher J.	Telephone conference with Attorney Chicotel regarding other payors research issue.	\$1,010	0.3	\$303.00								
	9/7/2023 Healey, Christopher J.	Prepare for Chicotel call.	\$1,010	0.2	\$202.00								
	9/7/2023 Healey, Christopher J.	Correspondence to team regarding Chicotel call and other payors issue.	\$1,010	0.2	\$202.00								
	9/7/2023 Healey, Christopher J.	Outline response to other payors defense and analysis re same.	\$1,010	1.5	\$1,515.00								
	9/8/2023 Healey, Christopher J.	Correspondence regarding other payors research issue.	\$1,010	0.1	\$101.00								
	9/8/2023 Healey, Christopher J.	Correspondence to librarian Valero regarding research projects.	\$1,010	0.2	\$202.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Lodestar Reductions</u>							
				<u>Worked</u>	<u>Fees</u>	<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Travel</u>	<u>Fees</u>
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	9/8/2023 Healey, Christopher J.	Research/analysis regarding other payors issue.	\$1,010	2	\$2,020.00								
	9/8/2023 Healey, Christopher J.	Correspondence to team regarding to do issues and other payors issue.	\$1,010	0.4	\$404.00								
	9/8/2023 Healey, Christopher J.	Conference call with team regarding shortfall discovery, other payor arguments.	\$1,010	1	\$1,010.00								
	9/11/2023 Healey, Christopher J.	Further revisions to trial proof matrix.	\$1,010	1.8	\$1,818.00								
	9/11/2023 Healey, Christopher J.	Outline prep for discovery meet/confer.	\$1,010	0.1	\$101.00								
	9/11/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding other payor documentation.	\$1,010	0.1	\$101.00								
	9/11/2023 Healey, Christopher J.	Correspondence to Attorney Wallace re class period issue.	\$1,010	0.1	\$101.00								
	9/12/2023 Healey, Christopher J.	Telephone conference with mediator Kaplan re status.	\$1,010	0.4	\$404.00								
		Revise trial proof matrix.	\$1,010	1.5	\$1,515.00			1.5	1515				
	9/13/2023 Healey, Christopher J.	Correspondence to Attorney Wallace motion to extend class period.	\$1,010	0.6	\$606.00								
	9/13/2023 Healey, Christopher J.	Correspondence to Attorney Umpierre regarding discovery meet/confer.	\$1,010	0.5	\$505.00								
	9/13/2023 Healey, Christopher J.	Correspondence to C. Valero regarding research issues concerning other payor defense.	\$1,010	0.2	\$202.00								
	9/13/2023 Healey, Christopher J.	Revise trial proof matrix.	\$1,010	0.7	\$707.00								
	9/14/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding discovery meet/confer prep.	\$1,010	0.5	\$505.00								
	9/14/2023 Healey, Christopher J.	Review file regarding prior discovery rulings.	\$1,010	0.3	\$303.00								
	9/14/2023 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding same.	\$1,010	0.2	\$202.00								
	9/14/2023 Healey, Christopher J.	Revise trial proof matrix.	\$1,010	0.8	\$808.00								
	9/14/2023 Healey, Christopher J.	Further telephone calls with Attorney Umpierre regarding meet/confer issues.	\$1,010	0.2	\$202.00								
	9/15/2023 Healey, Christopher J.	Correspondence regarding case deadlines.	\$1,010	0.1	\$101.00								
	9/15/2023 Healey, Christopher J.	Correspondence regarding motion to tax costs.	\$1,010	0.1	\$101.00								
	9/15/2023 Healey, Christopher J.	Review Attorney Umpierre correspondence regarding other payor declarants.	\$1,010	0.1	\$101.00								
	9/15/2023 Healey, Christopher J.	Revise trial proof matrix.	\$1,010	2.2	\$2,222.00								
	9/15/2023 Healey, Christopher J.	Correspond with Attorney Umpierre regarding meet/confer issues.	\$1,010	0.2	\$202.00								
	9/15/2023 Valero, Carmen A.	Research case authorities for "gift as property" and related Rest. Contracts 2d Sect 318, for C. Healey.	\$360	2	\$720.00								
	9/18/2023 Healey, Christopher J.	Review Attorney Umpierre summary of Gibson meet/confer.	\$1,010	0.2	\$202.00								
	9/18/2023 Healey, Christopher J.	Response correspondence regarding same.	\$1,010	0.2	\$202.00								
	9/18/2023 Healey, Christopher J.	Correspondence to Kennedy's office regarding damages discovery issues.	\$1,010	0.2	\$202.00								
	9/18/2023 Healey, Christopher J.	Review research analyst Valero research regarding Other Payor issues.	\$1,010	0.5	\$505.00								
	9/18/2023 Healey, Christopher J.	Research regarding gift as property argument.	\$1,010	0.5	\$505.00								
	9/19/2023 Healey, Christopher J.	Draft trial proof matrix and file review regarding same.	\$1,010	1.6	\$1,616.00								
	9/19/2023 Lehman, Carl J.	Continue to research and draft legal memorandum regarding class certification and standing issues.	\$520	1.8	\$936.00								
	9/20/2023 Healey, Christopher J.	Draft trial proof matrix and file review regarding same.	\$1,010	1.8	\$1,818.00								
	9/20/2023 Healey, Christopher J.	Correspondence with co-counsel regarding class member outreach.	\$1,010	0.1	\$101.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	9/20/2023 Healey, Christopher J.	Review research analyst Valero's research regarding admissibility of Sunrise briefs.	\$1,010	0.5	\$505.00								
	9/20/2023 Lehman, Carl J.	Continue to research and draft legal memorandum regarding class certification and standing issues.	\$520	2.6	\$1,352.00	1.3		676					
	9/21/2023 Healey, Christopher J.	Draft trial proof matrix.	\$1,010	0.5	\$505.00								
	9/21/2023 Healey, Christopher J.	Correspondence with co-counsel regarding class member outreach. Draft to do correspondence regarding class member outreach issues.	\$1,010	0.1	\$101.00								
	9/21/2023 Healey, Christopher J.	Telephone conference with co-counsel re class member outreach. Continue researching and drafting memorandum regarding standing and class certification issues.	\$1,010	0.4	\$404.00								
	9/21/2023 Healey, Christopher J.	Telephone conference with co-counsel re class member outreach. Continue researching and drafting memorandum regarding standing and class certification issues.	\$1,010	0.5	\$505.00								
	9/25/2023 Lehman, Carl J.	Continue to research and draft research memorandum regarding standing and class certification issues.	\$520	0.2	\$104.00								
	9/26/2023 Lehman, Carl J.	Research 9th Circ. cases for Article III standing and third party beneficiaries, for C. Lehman and C. Healey.	\$520	3.5	\$1,820.00	1.75		910					
	9/28/2023 Valero, Carmen A.	Revise response to Discovery Referee regarding status.	\$360	1	\$360.00								
	9/29/2023 Healey, Christopher J.	Correspondence regarding Sunrise mediation proposal.	\$1,010	0.2	\$202.00								
	9/29/2023 Healey, Christopher J.	Research Judge Welch background as proposed mediator.	\$1,010	0.5	\$505.00								
	9/29/2023 Healey, Christopher J.	Research Judge Welch background as proposed mediator. Telephone conferences with team members regarding proposed mediation and approach.	\$1,010	1	\$1,010.00				1	1,010.00			
	9/29/2023 Healey, Christopher J.	Research/analysis regarding claims made terms in proposed settlement.	\$1,010	0.7	\$707.00								
	9/29/2023 Healey, Christopher J.	Continue research and drafting of memorandum regarding standing and class certification issues.	\$520	3.4	\$1,768.00								
	9/29/2023 Lehman, Carl J.	Telephone conference with Attorney Umpierre regarding Sunrise discovery questions.	\$1,010	0.3	\$303.00								
	9/30/2023 Healey, Christopher J.	Research/analysis regarding Class Period issue.	\$1,010	1.5	\$1,515.00								
	9/30/2023 Healey, Christopher J.	Review and revised proposed response to Sunrise on discovery issues.	\$1,010	1.5	\$1,515.00								
	9/30/2023 Healey, Christopher J.	Continue to research and revise memorandum regarding standing and class certification.	\$1,010	1.5	\$1,515.00								
	9/30/2023 Lehman, Carl J.	Continue to research and revise memorandum regarding standing and class certification.	\$520	1.4	\$728.00								
	10/2/2023 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding trial prep session.	\$1,010	0.1	\$101.00								
	10/2/2023 Healey, Christopher J.	Correspondence to team regarding claims made settlement issue. Review and revised proposed response to Sunrise on discovery issues.	\$1,010	0.3	\$303.00								
	10/2/2023 Healey, Christopher J.	Review and revised proposed response to Sunrise on discovery issues.	\$1,010	0.4	\$404.00								
	10/2/2023 Healey, Christopher J.	Correspondence to Attorney Thamer regarding Slichta testimony and trial proof matrix.	\$1,010	0.4	\$404.00								
	10/2/2023 Healey, Christopher J.	Correspondence to Attorney Thamer regarding Slichta testimony and trial proof matrix.	\$1,010	0.3	\$303.00								
	10/2/2023 Lehman, Carl J.	Continue to research and draft memorandum regarding standing and class certification issues.	\$520	2.7	\$1,404.00	1.35		702					
	10/2/2023 Lehman, Carl J.	Review prior mediation briefing and outline updated mediation brief.	\$1,010	0.1	\$101.00								
	10/3/2023 Healey, Christopher J.	Correspondence to team regarding injunctive relief and potential settlement subclass issue.	\$1,010	0.1	\$101.00								
	10/3/2023 Healey, Christopher J.	Correspondence to team regarding injunctive relief and potential settlement subclass issue.	\$1,010	0.4	\$404.00								
	10/3/2023 Healey, Christopher J.	Correspondence with Attorney Stebner regarding mediation scheduling.	\$1,010	0.2	\$202.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	10/3/2023 Lehman, Carl J.	Continue to research and draft memorandum regarding standing and class certification issues.	\$520	1		\$520.00									
	10/4/2023 Healey, Christopher J.	Review research memorandum regarding other payors issue.	\$1,010	0.5		\$505.00									
	10/4/2023 Healey, Christopher J.	Preparation for call regarding class member outreach.	\$1,010	0.2		\$202.00									
	10/4/2023 Healey, Christopher J.	Telephone conference with team regarding class member outreach.	\$1,010	0.5		\$505.00					0.5	505.00			
	10/4/2023 Healey, Christopher J.	Follow up correspondence regarding same.	\$1,010	0.3		\$303.00									
	10/4/2023 Healey, Christopher J.	Research and analysis regarding Sunrise admission contracts and legal obligations regarding other payor issues.	\$1,010	1.5		\$1,515.00		0.75	757.5						
	10/5/2023 Healey, Christopher J.	Correspondence regarding potential mediation.	\$1,010	0.2		\$202.00									
	10/6/2023 Valero, Carmen A.	Research trial admissibility of declaration and 9th Circ. FRE 804 case authorities, for C. Healey.	\$360	1		\$360.00									
	10/9/2023 Healey, Christopher J.	Correspondence with Attorney Wallace regarding other payor issue.	\$1,010	0.3		\$303.00									
	10/9/2023 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding Sunrise document production.	\$1,010	0.2		\$202.00									
	10/9/2023 Healey, Christopher J.	Review and analysis regarding trial admissibility issues, including admissibility of Slichta declaration.	\$1,010	2		\$2,020.00									
	10/9/2023 Myrick, Tracy R.	Work with defendant vendor KLD to acquire access to Defendant Production SUN051 on their ftp site.	\$195	0.2		\$39.00									
	10/9/2023 Myrick, Tracy R.	Download defendant production SUN051 and provide caseteam with details and link to location.	\$195	0.4		\$78.00									
	10/9/2023 Myrick, Tracy R.	Update production log with defendant production SUN051 details.	\$195	0.1		\$19.50									
	10/10/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding other payor issue.	\$1,010	0.2		\$202.00									
	10/10/2023 Healey, Christopher J.	Office conference with Attorney Lehman regarding other payor research project.	\$1,010	0.5		\$505.00									
	10/10/2023 Healey, Christopher J.	Review Sunrise document production.	\$1,010	2		\$2,020.00									
	10/10/2023 Lehman, Carl J.	Conference with C. Healey regarding research results and further issues to research.	\$520	0.5		\$260.00									
	10/11/2023 Healey, Christopher J.	Correspondence regarding potential cert petition.	\$1,010	0.2		\$202.00									
	10/11/2023 Healey, Christopher J.	Correspondence to Attorney Lehman regarding follow-up research on other payor issue.	\$1,010	0.7		\$707.00									
	10/11/2023 Healey, Christopher J.	Correspondence to team regarding family member interviews.	\$1,010	0.3		\$303.00									
	10/11/2023 Healey, Christopher J.	Correspondence to Attyn MacAllister regarding potential cert petition.	\$1,010	0.4		\$404.00									
	10/11/2023 Healey, Christopher J.	Correspondence to Attorney Umpierre regarding case schedule.	\$1,010	0.2		\$202.00									
	10/11/2023 Healey, Christopher J.	Review correspondence regarding other payor evidence and note regarding same.	\$1,010	0.5		\$505.00									
	10/11/2023 Healey, Christopher J.	Review Sunrise docs from Production # 50.	\$1,010	0.7		\$707.00									
	10/12/2023 Healey, Christopher J.	Correspondence regarding potential cert petition.	\$1,010	0.1		\$101.00									
	10/12/2023 Healey, Christopher J.	Review Ms. Valero's research on gift issues (pertinent to other payor issue) and analysis regarding same.	\$1,010	1.8		\$1,818.00									
	10/12/2023 Healey, Christopher J.	Correspondence with Attorney Stebner regarding mediation schedule.	\$1,010	0.1		\$101.00									
	10/12/2023 Healey, Christopher J.	Correspondence to team regarding same.	\$1,010	0.2		\$202.00									
	10/12/2023 Healey, Christopher J.	Review Sunrise docs from Production # 50.	\$1,010	0.5		\$505.00									

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
		Telephone conference with Attorney McAllister regarding potential cert petition.	\$1,010	0.2	\$202.00								
	10/13/2023 Healey, Christopher J.	Correspondence to team regarding McAllister call/insights.	\$1,010	0.2	\$202.00								
	10/13/2023 Healey, Christopher J.	Review Sunrise documents from Production # 50.	\$1,010	0.5	\$505.00								
	10/16/2023 Healey, Christopher J.	Review Sunrise documents from Production # 51 (1.5). Continue to research and draft analysis regarding third-party beneficiary and standing issues.	\$1,010	1.5	\$1,515.00								
	10/16/2023 Lehman, Carl J.	Review Sunrise documents from Production # 51.	\$520	1	\$520.00								
	10/17/2023 Healey, Christopher J.	Revise mediation case summary.	\$1,010	0.1	\$101.00								
	10/17/2023 Healey, Christopher J.	Correspondence regarding mediation scheduling.	\$1,010	0.2	\$202.00								
	10/17/2023 Healey, Christopher J.	Review JAMS rules.	\$1,010	0.1	\$101.00								
	10/17/2023 Healey, Christopher J.	Correspondence to team regarding new Art III decision. Telephone conference with Attorney Wallace regarding CLRA proof and related issues.	\$1,010	0.2	\$202.00								
	10/17/2023 Healey, Christopher J.	Review Sunrise documents from Production No. 51.	\$1,010	1.5	\$1,515.00								
	10/18/2023 Healey, Christopher J.	Prepare timeline regarding CLM and related Sunrise projects.	\$1,010	0.5	\$505.00								
	10/19/2023 Healey, Christopher J.	Prepare timelines regarding key Sunrise background. Research and investigation regarding Sunrise operations and witnesses.	\$1,010	0.5	\$505.00								
	10/19/2023 Healey, Christopher J.	Review and comment on Brookdale motion for leave to file class motion.	\$1,010	2	\$2,020.00								
	10/19/2023 Healey, Christopher J.	Continue to research and draft analysis regarding third-party beneficiary and standing issues.	\$1,010	0.5	\$505.00								
	10/19/2023 Lehman, Carl J.	Telephone conference with Attorney Wallace regarding mediation preparation and Sunrise documents.	\$520	0.4	\$208.00								
	10/20/2023 Healey, Christopher J.	Prepare correspondence to team regarding Sunrise business update and mediation.	\$1,010	0.2	\$202.00								
	10/20/2023 Healey, Christopher J.	Review Sunrise documents.	\$1,010	0.5	\$505.00								
	10/20/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding case schedule and Sunrise document production.	\$1,010	0.3	\$303.00								
	10/23/2023 Lehman, Carl J.	Perform additional research and analysis regarding legal issues including whether a payment of an obligation to a third party constitutes a gift and Article III standing for third-party beneficiaries. Telephone conference with Attorney Umpierre regarding Sunrise's non-response on discovery/case scheduling issues and options regarding same.	\$520	3	\$1,560.00								
	10/24/2023 Healey, Christopher J.	Review and revise meet and confer letter regarding schedule/discovery.	\$1,010	0.3	\$303.00								
	10/25/2023 Healey, Christopher J.	Continue research and analysis regarding Article III and Class Certification issues.	\$1,010	0.5	\$505.00								
	10/27/2023 Lehman, Carl J.	Correspondence regarding meet and confer status.	\$520	0.5	\$260.00								
	10/31/2023 Healey, Christopher J.	Correspondence with Attorney Marks regarding trial preparation meeting.	\$1,010	0.1	\$101.00								
	10/31/2023 Healey, Christopher J.	Review Sunrise letter regarding class list.	\$1,010	0.2	\$202.00								
	11/1/2023 Healey, Christopher J.	Prepare correspondence to team regarding same. Prepare correspondence to Attorney Stebner regarding mediation preparation.	\$1,010	0.2	\$202.00								
	11/1/2023 Healey, Christopher J.	Correspondence regarding mediation.	\$1,010	0.2	\$202.00								
	11/1/2023 Healey, Christopher J.		\$1,010	0.1	\$101.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	11/1/2023 Healey, Christopher J.	Outline damages calculation.	\$1,010	0.2		\$202.00									
	11/1/2023 Healey, Christopher J.	Research regarding pre-judgment interest.	\$1,010	0.5		\$505.00									
	11/1/2023 Healey, Christopher J.	Prepare correspondence regarding team call.	\$1,010	0.1		\$101.00									
	11/2/2023 Healey, Christopher J.	Review correspondence regarding Sunrise position on class period and follow-up regarding same.	\$1,010	0.1		\$101.00									
	11/2/2023 Healey, Christopher J.	Research regarding pre-judgment interest.	\$1,010	0.2		\$202.00									
	11/2/2023 Healey, Christopher J.	Correspondence regarding team call.	\$1,010	0.2		\$202.00									
	11/3/2023 Healey, Christopher J.	Prepare for team call regarding mediation, case schedule, discovery.	\$1,010	0.3		\$303.00									
	11/3/2023 Healey, Christopher J.	Attend team call re same	\$1,010	1.2		\$1,212.00				1.2	1,212.00				
	11/3/2023 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding same.	\$1,010	0.2		\$202.00									
	11/3/2023 Healey, Christopher J.	Telephone conference with Attorney Marks regarding class member outreach.	\$1,010	0.2		\$202.00									
	11/3/2023 Healey, Christopher J.	Telephone conference with Attorney Warren regarding investigation.	\$1,010	0.1		\$101.00									
	11/3/2023 Healey, Christopher J.	Draft special verdict form.	\$1,010	0.5		\$505.00									
	11/3/2023 Healey, Christopher J.	Revise damages exposure.	\$1,010	0.3		\$303.00									
	11/3/2023 Healey, Christopher J.	Draft to-do correspondence to team.	\$1,010	0.2		\$202.00									
	11/3/2023 Healey, Christopher J.	Review updated memorandum regarding other payors issue.	\$1,010	0.1		\$101.00									
	11/3/2023 Healey, Christopher J.	Prepare correspondence to team regarding fees/costs for mediation preparation.	\$1,010	0.2		\$202.00									
	11/3/2023 Lehman, Carl J.	Finish research and analysis regarding Article III standing and third party beneficiaries.	\$520	1		\$520.00									
	11/6/2023 Healey, Christopher J.	Review file regarding prior mediation efforts.	\$1,010	0.5		\$505.00									
	11/6/2023 Healey, Christopher J.	Correspondence regarding mediation brief.	\$1,010	0.2		\$202.00									
	11/6/2023 Healey, Christopher J.	Draft timeline of key documents.	\$1,010	1.5		\$1,515.00									
	11/6/2023 Healey, Christopher J.	Correspondence regarding mediation logistics.	\$1,010	0.2		\$202.00									
	11/7/2023 Healey, Christopher J.	Correspondence regarding mediation preparation.	\$1,010	0.2		\$202.00									
	11/7/2023 Healey, Christopher J.	Further drafting of timeline regarding key documents.	\$1,010	1.5		\$1,515.00			1.5	1515					
	11/7/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding status conference request.	\$1,010	0.1		\$101.00									
	11/7/2023 Healey, Christopher J.	Outline draft request for status conference/motion to clarify class period.	\$1,010	1		\$1,010.00									
	11/7/2023 Myrick, Tracy R.	Download multiple Defendant productions from vendor KLD FTP site.	\$195	0.6		\$117.00									
	11/7/2023 Myrick, Tracy R.	Update production log to reflect SUN050, SUN052, SUN053, AND SUN054 defendant productions.	\$195	0.3		\$58.50									
	11/8/2023 Healey, Christopher J.	Correspondence regarding Sunrise document production.	\$1,010	0.1		\$101.00									
	11/8/2023 Healey, Christopher J.	Draft trial brief inserts.	\$1,010	2.4		\$2,424.00									
	11/8/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding overpayment evidence issues.	\$1,010	0.2		\$202.00									
	11/8/2023 Healey, Christopher J.	Prepare correspondence regarding same.	\$1,010	0.2		\$202.00									
	11/8/2023 Healey, Christopher J.	Review Lytle decision and appellate status.	\$1,010	0.2		\$202.00									
	11/8/2023 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding mediation preparation and settlement.	\$1,010	0.5		\$505.00									
	11/8/2023 Healey, Christopher J.	Review draft deal sheet and correspondence regarding same.	\$1,010	0.2		\$202.00									
	11/8/2023 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding overpayment valuation issues.	\$1,010	0.2		\$202.00									
	11/9/2023 Healey, Christopher J.	Revise settlement deal sheet.	\$1,010	0.8		\$808.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>			
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	11/9/2023 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.2		\$202.00								
	11/9/2023 Healey, Christopher J.	Telephone conference with Attorney Marks regarding class member outreach and mediation presentation.	\$1,010	0.3		\$303.00								
	11/9/2023 Healey, Christopher J.	Telephone conference with Attorney Marks regarding medical files for potential witnesses.	\$1,010	0.2		\$202.00								
	11/9/2023 Healey, Christopher J.	Review and revise Marks lodestar summary.	\$1,010	0.3		\$303.00								
	11/9/2023 Healey, Christopher J.	Update lodestar summary.	\$1,010	0.2		\$202.00								
	11/9/2023 Healey, Christopher J.	Correspondence regarding Sunrise production.	\$1,010	0.2		\$202.00								
	11/9/2023 Healey, Christopher J.	Review Sunrise production #54 and prepare notes regarding same.	\$1,010	1.4		\$1,414.00								
	11/9/2023 Healey, Christopher J.	Review file regarding potential trial witnesses and prepare correspondence regarding same.	\$1,010	0.4		\$404.00								
	11/9/2023 Myrick, Tracy R.	Extract Defendant Production SUN053 and provide caseteam with link to location.	\$195	0.2		\$39.00								
	11/9/2023 Myrick, Tracy R.	Pull complaint letter (dated 4/28/20) that references a death at the Sunrise Sacramento facility and circulated in PDF format to caseteam per C. Healey request.	\$195	0.1		\$19.50								
	11/10/2023 Healey, Christopher J.	Correspondence regarding exposure analysis updates.	\$1,010	0.2		\$202.00								
	11/10/2023 Healey, Christopher J.	Revise same.	\$1,010	0.2		\$202.00								
	11/10/2023 Healey, Christopher J.	Prepare correspondence to team regarding exposure analysis and lodestar calculations.	\$1,010	0.3		\$303.00								
	11/10/2023 Healey, Christopher J.	Correspondence regarding Sunrise document productions.	\$1,010	0.1		\$101.00								
	11/10/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding status conference request and related issues.	\$1,010	0.2		\$202.00								
	11/10/2023 Healey, Christopher J.	Review settlement communications to Sunrise settlement counsel, Attorney Lee.	\$1,010	0.1		\$101.00								
	11/10/2023 Healey, Christopher J.	Prepare correspondence to C. Valero regarding research issues.	\$1,010	0.3		\$303.00								
	11/10/2023 Healey, Christopher J.	Draft trial brief.	\$1,010	0.5		\$505.00								
	11/10/2023 Myrick, Tracy R.	Re-download, extract and assess Defendant Production SUN050 and provide caseteam with details and link to location.	\$195	0.4		\$78.00								
	11/10/2023 Myrick, Tracy R.	Download, extract and assess Defendant Production SUN052 and provide caseteam with details and link to location.	\$195	0.2		\$39.00								
	11/10/2023 Myrick, Tracy R.	Download, extract and assess Defendant Production SUN053 and provide caseteam with details and link to location.	\$195	0.2		\$39.00								
	11/10/2023 Myrick, Tracy R.	Prepare and send Defendant SUN054 production details to caseteam.	\$195	0.1		\$19.50								
	11/12/2023 Healey, Christopher J.	Review and revise Plaintiffs' request for status conference.	\$1,010	0.5		\$505.00								
	11/12/2023 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding same.	\$1,010	0.2		\$202.00								
	11/13/2023 Healey, Christopher J.	Correspondence regarding mediation preparation.	\$1,010	0.2		\$202.00								
	11/13/2023 Healey, Christopher J.	Review interview summary of former Sunrise employee.	\$1,010	0.2		\$202.00								
	11/13/2023 Healey, Christopher J.	Prepare correspondence regarding witness search.	\$1,010	0.2		\$202.00								
	11/13/2023 Healey, Christopher J.	Correspondence regarding Status Conference request.	\$1,010	0.1		\$101.00								
	11/13/2023 Healey, Christopher J.	Draft trial brief.	\$1,010	2.5		\$2,525.00								
	11/13/2023 Healey, Christopher J.	Review C. Valero research regarding class period issue.	\$1,010	0.1		\$101.00								
	11/13/2023 Valero, Carmen A.	Research 9th Circ. cases discussing appropriate time period for a certified or proposed class action, for C. Healey.	\$360	1		\$360.00								
	11/14/2023 Healey, Christopher J.	Review Gibson letter regarding discovery issues.	\$1,010	0.1		\$101.00								
	11/14/2023 Healey, Christopher J.	Correspondence regarding status conference statement.	\$1,010	0.2		\$202.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	11/14/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding status conference statement and discovery meet/confer.	\$1,010	0.2	\$202.00								
	11/14/2023 Healey, Christopher J.	Draft trial brief.	\$1,010	2	\$2,020.00								
	11/14/2023 Healey, Christopher J.	Response to correspondence regarding class period issue.	\$1,010	0.2	\$202.00								
	11/14/2023 Myrick, Tracy R.	Export and assess various defendant production files from Relativity per C. Healey's request.	\$195	0.7	\$136.50								
	11/15/2023 Healey, Christopher J.	Office conferences regarding review of Sunrise document production.	\$1,010	0.2	\$202.00								
	11/15/2023 Healey, Christopher J.	Review Sunrise documents.	\$1,010	1.5	\$1,515.00								
	11/15/2023 Healey, Christopher J.	Draft trial brief.	\$1,010	2	\$2,020.00								
	11/16/2023 Healey, Christopher J.	Review draft motion to clarify class period.	\$1,010	0.5	\$505.00								
	11/16/2023 Healey, Christopher J.	Revise draft class period brief.	\$1,010	1.5	\$1,515.00								
	11/17/2023 Healey, Christopher J.	Revise motion to clarify class period.	\$1,010	2.5	\$2,525.00								
	11/17/2023 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.3	\$303.00								
	11/19/2023 Healey, Christopher J.	Telephone conference with Attorney Marks regarding trial preparation.	\$1,010	0.2	\$202.00								
	11/19/2023 Healey, Christopher J.	Review Sunrise proposal regarding status conference request.	\$1,010	0.1	\$101.00								
	11/19/2023 Healey, Christopher J.	Revise status conference proposal.	\$1,010	0.4	\$404.00								
	11/19/2023 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$1,010	0.1	\$101.00								
	11/20/2023 Healey, Christopher J.	Prepare correspondence regarding move-in fees.	\$1,010	0.1	\$101.00								
	11/20/2023 Healey, Christopher J.	Draft trial brief.	\$1,010	1.5	\$1,515.00								
	11/21/2023 Healey, Christopher J.	Draft trial brief.	\$1,010	1.2	\$1,212.00								
	11/22/2023 Healey, Christopher J.	Draft trial brief.	\$1,010	2	\$2,020.00								
	11/22/2023 Valero, Carmen A.	Research and retrieve: Cases re CLRA and damages under CC 1780(b), cases re treble damages under CC 3345, and judicial analytics on Hon. Diane Welsh's handling of class action, elder abuse, or consumer protection claims for C. Healey.	\$360	1	\$360.00								
	11/27/2023 Healey, Christopher J.	Draft trial brief.	\$1,010	4.6	\$4,646.00	2.3	2323						
	11/27/2023 Healey, Christopher J.	Correspondence regarding trial preparation meeting.	\$1,010	0.1	\$101.00								
	11/28/2023 Healey, Christopher J.	Draft trial brief.	\$1,010	2.5	\$2,525.00								
	11/28/2023 Healey, Christopher J.	Correspondence regarding trial preparation meeting.	\$1,010	0.1	\$101.00								
	11/29/2023 Healey, Christopher J.	Draft trial brief.	\$1,010	2.5	\$2,525.00								
	11/29/2023 Myrick, Tracy R.	Provide metadata defendants provided for SUN0110524.PPTX to C. Healey.	\$195	0.2	\$39.00								
	11/30/2023 Healey, Christopher J.	Draft trial brief.	\$1,010	3.5	\$3,535.00								
	12/1/2023 Healey, Christopher J.	Draft trial brief.	\$1,010	1.5	\$1,515.00								
	12/1/2023 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding trial brief.	\$1,010	0.2	\$202.00								
	12/1/2023 Healey, Christopher J.	Prepare correspondence to team regarding trial preparation materials.	\$1,010	0.5	\$505.00								
	12/1/2023 Healey, Christopher J.	Revise jury verdict form.	\$1,010	0.3	\$303.00								
	12/3/2023 Healey, Christopher J.	Correspondence with Attorney Stebner regarding mediation and related issues.	\$1,010	0.2	\$202.00								
	12/3/2023 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.1	\$101.00								
	12/4/2023 Healey, Christopher J.	Draft proposed order of trial witnesses.	\$1,010	2	\$2,020.00								
	12/4/2023 Healey, Christopher J.	Telephone conference with Attorney Marks regarding trial preparation meeting.	\$1,010	0.3	\$303.00								
	12/4/2023 Healey, Christopher J.	Prepare correspondence to team regarding meeting agenda.	\$1,010	0.2	\$202.00								
	12/4/2023 Healey, Christopher J.	Review correspondence regarding trial preparation meeting.	\$1,010	0.2	\$202.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	12/5/2023 Healey, Christopher J.	Travel to Austin to attend trial preparation meeting.	\$1,010	5	\$5,050.00								
	12/5/2023 Healey, Christopher J.	Meet with co-counsel regarding trial and mediation issues.	\$1,010	1	\$1,010.00								
	12/6/2023 Healey, Christopher J.	Meet with co-counsel regarding trial preparation and mediation issues.	\$1,010	6.5	\$6,565.00								
	12/7/2023 Healey, Christopher J.	Meet with co-counsel regarding trial preparation and mediation issues.	\$1,010	6	\$6,060.00								
	12/7/2023 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding Sunrise counsel and mediation.	\$1,010	0.3	\$303.00								
	12/7/2023 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding same.	\$1,010	0.2	\$202.00								
	12/8/2023 Healey, Christopher J.	Return travel from Austin to attend trial preparation meeting.	\$1,010	5	\$5,050.00							5	5,050.00
	12/8/2023 Healey, Christopher J.	Meet with co-counsel regarding trial and mediation issues.	\$1,010	1	\$1,010.00								
	12/8/2023 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding mediation status.	\$1,010	0.1	\$101.00								
	12/8/2023 Healey, Christopher J.	Follow-up correspondence regarding mediation preparation.	\$1,010	0.2	\$202.00								
	12/10/2023 Healey, Christopher J.	Research regarding "reasonable person" test under CLRA.	\$1,010	1.5	\$1,515.00								
	12/10/2023 Healey, Christopher J.	Draft mediation brief.	\$1,010	1.5	\$1,515.00								
	12/11/2023 Healey, Christopher J.	Draft mediation brief.	\$1,010	2.5	\$2,525.00								
	12/11/2023 Healey, Christopher J.	Review correspondence regarding Sunrise counter.	\$1,010	0.1	\$101.00								
	12/11/2023 Healey, Christopher J.	Telephone conferences with Attorney Stebner regarding same.	\$1,010	0.2	\$202.00								
	12/11/2023 Healey, Christopher J.	Correspondence regarding mediation preparation.	\$1,010	0.3	\$303.00								
	12/11/2023 Healey, Christopher J.	Draft summary on reasonable person test.	\$1,010	0.5	\$505.00								
	12/12/2023 Healey, Christopher J.	Draft mediation brief.	\$1,010	1.5	\$1,515.00								
	12/12/2023 Healey, Christopher J.	Telephone conference with Attorney Marks regarding mediation issues and approach.	\$1,010	0.2	\$202.00								
	12/12/2023 Healey, Christopher J.	Review JAMS correspondence regarding mediation.	\$1,010	0.2	\$202.00								
	12/12/2023 Healey, Christopher J.	Revise key jury instructions and key proof elements.	\$1,010	0.5	\$505.00								
	12/13/2023 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding discovery.	\$1,010	0.1	\$101.00								
	12/13/2023 Healey, Christopher J.	Draft mediation brief.	\$1,010	5	\$5,050.00								
	12/14/2023 Healey, Christopher J.	Draft mediation brief.	\$1,010	0.1	\$101.00								
	12/14/2023 Healey, Christopher J.	Correspondence to mediator Kaplan.	\$1,010	3.5	\$3,535.00								
	12/15/2023 Healey, Christopher J.	Draft mediation brief.	\$1,010	1.5	\$1,515.00								
	12/15/2023 Healey, Christopher J.	Correspondence to team regarding same.	\$1,010	0.2	\$202.00								
	12/18/2023 Healey, Christopher J.	Correspond regarding neglect to Sunrise resident.	\$1,010	0.2	\$202.00								
	12/18/2023 Healey, Christopher J.	Draft stipulated injunction.	\$1,010	2.5	\$2,525.00								
	12/18/2023 Healey, Christopher J.	Correspondence regarding document review.	\$1,010	0.1	\$101.00								
	12/19/2023 Healey, Christopher J.	Review Attorney Warren changes to mediation brief.	\$1,010	0.3	\$303.00								
	12/19/2023 Healey, Christopher J.	Revise draft mediation brief.	\$1,010	1	\$1,010.00								
	12/19/2023 Healey, Christopher J.	Update selected jury instructions.	\$1,010	0.7	\$707.00								
	12/19/2023 Healey, Christopher J.	Correspondence regarding same.	\$1,010	0.2	\$202.00								
	12/19/2023 Myrick, Tracy R.	Provide to C. Healey, Brian Umpierre, James Thornton, and David Marks list of metadata defendants produced for the requested Power Point records.	\$195	0.4	\$78.00								
	12/20/2023 Healey, Christopher J.	Review Attyn Marks revisions to mediation brief.	\$1,010	0.5	\$505.00								
	12/20/2023 Healey, Christopher J.	Revise draft mediation brief.	\$1,010	1	\$1,010.00								
	12/20/2023 Healey, Christopher J.	Correspondence with Attyn Yarnall regarding class member outreach.	\$1,010	0.3	\$303.00								
	12/20/2023 Healey, Christopher J.	Review JAM correspondence regarding mediation prep and note to team regarding same.	\$1,010	0.1	\$101.00								
	12/21/2023 Healey, Christopher J.	Revise draft mediation brief.	\$1,010	3.2	\$3,232.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	12/22/2023 Healey, Christopher J.	Telephone conference with Attorney Marks regarding mediation brief and presentation.	\$1,010	0.2	\$202.00								
	12/22/2023 Healey, Christopher J.	Analysis regarding Sunrise confidentiality provisions and note regarding same.	\$1,010	0.3	\$303.00								
	12/22/2023 Healey, Christopher J.	Correspondence regarding wait time issue.	\$1,010	0.2	\$202.00								
	12/22/2023 Healey, Christopher J.	Correspondence regarding witness privacy issue.	\$1,010	0.2	\$202.00								
	12/26/2023 Healey, Christopher J.	Review Yarnall email regarding DSS complaints and insert regarding same to mediation brief.	\$1,010	0.1	\$101.00								
	12/26/2023 Healey, Christopher J.	Revise mediation brief.	\$1,010	1.5	\$1,515.00								
	12/26/2023 Healey, Christopher J.	Draft exhibit index to mediation brief.	\$1,010	0.5	\$505.00								
	12/27/2023 Healey, Christopher J.	Revise mediation brief.	\$1,010	3.5	\$3,535.00								
	12/27/2023 Howard, Kathryn M.	Email exchange with C. Healey regarding checking the cases cited in Plaintiff's Mediation Brief.	\$325	0.1	\$32.50								
	12/27/2023 Howard, Kathryn M.	Brief review of Mediation Brief.	\$325	0.2	\$65.00								
	12/28/2023 Healey, Christopher J.	Revise mediation brief.	\$1,010	2.3	\$2,323.00								
	12/28/2023 Healey, Christopher J.	Correspondence to team regarding same.	\$1,010	0.2	\$202.00								
	12/28/2023 Healey, Christopher J.	Prepare mediation brief attachments.	\$1,010	1	\$1,010.00								
	12/28/2023 Howard, Kathryn M.	Analysis of Mediation Brief including checking legal citations and revisions thereto.	\$325	2.1	\$682.50								
	12/28/2023 Howard, Kathryn M.	Review negative treatment of cited cases.	\$325	0.4	\$130.00								
	12/28/2023 Howard, Kathryn M.	Review and finalize Mediation Brief.	\$325	0.2	\$65.00								
	12/28/2023 Howard, Kathryn M.	Prepare email to C. Healey regarding same.	\$325	0.1	\$32.50								
	12/28/2023 Myrick, Tracy R.	Prepare save search in Relativity of documents to export to be used as attachments to mediation brief per caseteam.	\$195	0.2	\$39.00								
	12/28/2023 Myrick, Tracy R.	Export and qc documents.	\$195	0.7	\$136.50								
	12/28/2023 Myrick, Tracy R.	Send caseteam link to location.	\$195	0.1	\$19.50								
	12/29/2023 Healey, Christopher J.	Revise mediation brief.	\$1,010	1.5	\$1,515.00								
	12/29/2023 Healey, Christopher J.	Correspondence to team regarding updated brief.	\$1,010	0.1	\$101.00								
	12/29/2023 Healey, Christopher J.	Review Attorney Umpierre correspondence regarding mediation brief.	\$1,010	0.1	\$101.00								
	12/29/2023 Howard, Kathryn M.	Review email from C. Healey regarding the cite-checked mediation brief and prepare response thereto.	\$325	0.1	\$32.50								
	12/30/2023 Healey, Christopher J.	Prepare correspondence to JAMS regarding record submission.	\$1,010	0.1	\$101.00								
	12/30/2023 Healey, Christopher J.	Review and revise mediation submission.	\$1,010	1	\$1,010.00								
	12/30/2023 Healey, Christopher J.	Revise mediation brief and exhibits.	\$1,010	1.2	\$1,212.00								
	12/30/2023 Myrick, Tracy R.	Download and provide selective pages from Operations Manual to caseteam for attachment to Mediation Brief.	\$195	0.2	\$39.00								
	1/2/2024 Healey, Christopher J.	Review and revise mediation submission.	\$1,010	2.2	\$2,222.00								
	1/2/2024 Healey, Christopher J.	Office conferences regarding same.	\$1,010	0.2	\$202.00								
	1/2/2024 Healey, Christopher J.	Prepare correspondence to JAMS regarding record submission.	\$1,010	0.1	\$101.00								
	1/2/2024 Healey, Christopher J.	Prepare for mediation.	\$1,010	1.5	\$1,515.00								
	1/2/2024 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.3	\$303.00								
	1/2/2024 Myrick, Tracy R.	Finalize and organization of attachments to Mediation Brief per caseteam.	\$195	0.9	\$175.50								
	1/3/2024 Healey, Christopher J.	Review Sunrise mediation brief.	\$1,010	1	\$1,010.00								
	1/3/2024 Healey, Christopher J.	Outline responses to Sunrise mediation brief.	\$1,010	2	\$2,020.00								
	1/4/2024 Healey, Christopher J.	Outline responses to Sunrise mediation brief.	\$1,010	4.2	\$4,242.00								
	1/4/2024 Healey, Christopher J.	Revise letter to Sunrise regarding missing discovery.	\$1,010	0.4	\$404.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	1/4/2024 Valero, Carmen A.	Research and retrieve legislative history of Stats 1988 ch. 823 SB 1157, adding CC 3345 and amending CC 1750 (CLRA), for C. Healey.	\$360	0.2	\$72.00								
	1/5/2024 Healey, Christopher J.	Telephone conference with Attorney Marks regarding mediation preparation.	\$1,010	0.3	\$303.00								
	1/5/2024 Healey, Christopher J.	Outline responses to Sunrise mediation brief.	\$1,010	3.8	\$3,838.00								
	1/5/2024 Healey, Christopher J.	Telephone conference with team regarding mediation preparation. Follow up correspondence to team regarding mediation preparation.	\$1,010	0.7	\$707.00			0.7	707.00				
	1/5/2024 Healey, Christopher J.	Outline responses to Sunrise mediation brief.	\$1,010	0.3	\$303.00								
	1/6/2024 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding expert costs issue.	\$1,010	3.5	\$3,535.00								
	1/7/2024 Healey, Christopher J.	Correspondence regarding same.	\$1,010	0.2	\$202.00								
	1/7/2024 Healey, Christopher J.	Outline responses to Sunrise mediation brief.	\$1,010	1.5	\$1,515.00								
	1/8/2024 Healey, Christopher J.	Correspondence regarding Revera status.	\$1,010	0.1	\$101.00								
	1/8/2024 Healey, Christopher J.	Preparation for mediation.	\$1,010	3.5	\$3,535.00								
	1/8/2024 Valero, Carmen A.	Research 9th Circ case authorities construing language of CA Civ Code sect 1780(a)(1) as applicable to a class award, for C. Healey.	\$360	1	\$360.00								
	1/9/2024 Healey, Christopher J.	Travel to Philadelphia for mediation.	\$1,010	6	\$6,060.00							6	6,060.00
	1/9/2024 Healey, Christopher J.	Meet with co-counsel to prepare for mediation.	\$1,010	1	\$1,010.00								
	1/10/2024 Healey, Christopher J.	Prepare for mediation.	\$1,010	1.2	\$1,212.00								
	1/10/2024 Healey, Christopher J.	Attend mediation.	\$1,010	7	\$7,070.00								
	1/10/2024 Healey, Christopher J.	Meeting with co-counsel to prepare for Day 2 mediation.	\$1,010	0.3	\$303.00								
	1/11/2024 Healey, Christopher J.	Prepare for mediation.	\$1,010	0.5	\$505.00								
	1/11/2024 Healey, Christopher J.	Revise draft deal sheet.	\$1,010	0.5	\$505.00								
	1/11/2024 Healey, Christopher J.	Attend mediation.	\$1,010	5	\$5,050.00								
	1/11/2024 Healey, Christopher J.	Prepare analysis of mediator's proposal (during travel).	\$1,010	3	\$3,030.00								
	1/11/2024 Healey, Christopher J.	Return travel to San Diego from mediation.	\$1,010	3	\$3,030.00							3	3,030.00
	1/12/2024 Healey, Christopher J.	Revise spreadsheet analysis of mediator's proposal.	\$1,010	2.5	\$2,525.00								
	1/12/2024 Healey, Christopher J.	Draft correspondence to team regarding same.	\$1,010	0.5	\$505.00								
	1/12/2024 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding mediator's proposal and related issues.	\$1,010	0.3	\$303.00								
	1/12/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$1,010	0.2	\$202.00								
	1/13/2024 Healey, Christopher J.	Further analysis regarding mediation proposal.	\$1,010	1	\$1,010.00								
	1/13/2024 Healey, Christopher J.	Correspondence regarding same.	\$1,010	0.2	\$202.00								
	1/14/2024 Healey, Christopher J.	Research regarding attorneys' fees and related issues.	\$1,010	1	\$1,010.00								
	1/15/2024 Healey, Christopher J.	Research regarding attorneys' fees and related issues.	\$1,010	3	\$3,030.00								
	1/16/2024 Healey, Christopher J.	Research regarding attorneys' fees and related issues.	\$1,010	1.5	\$1,515.00								
	1/16/2024 Healey, Christopher J.	Review correspondence from Gibson regarding case deadlines.	\$1,010	0.1	\$101.00								
	1/17/2024 Healey, Christopher J.	Telephone conference with team regarding analysis of mediator's proposal and settlement options.	\$1,010	0.6	\$606.00			0.6	606.00				
	1/17/2024 Healey, Christopher J.	Telephone conference with Attorney Warren regarding same.	\$1,010	0.1	\$101.00								
	1/17/2024 Healey, Christopher J.	Review and revise position statement regarding Class Period termination date.	\$1,010	1	\$1,010.00								
	1/18/2024 Healey, Christopher J.	Revise position statement regarding class period issue.	\$1,010	1.5	\$1,515.00								
	1/19/2024 Healey, Christopher J.	Revise position statement.	\$1,010	1	\$1,010.00								
	1/19/2024 Healey, Christopher J.	Analysis regarding settlement issues.	\$1,010	0.7	\$707.00								

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	1/19/2024 Howard, Kathryn M.	Email exchange with L. Valdez regarding class period position statement.	\$325	0.1	\$32.50								
	1/19/2024 Howard, Kathryn M.	Brief review of position statement in conjunction with checking the legal citations.	\$325	0.4	\$130.00								
	1/22/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding Sunrise position regarding injunction.	\$1,010	0.4	\$404.00								
	1/22/2024 Healey, Christopher J.	Prepare correspondence regarding settlement data required.	\$1,010	0.1	\$101.00								
	1/22/2024 Healey, Christopher J.	Review comments to draft Position Statement regarding Class Period.	\$1,010	0.3	\$303.00								
	1/22/2024 Healey, Christopher J.	Prepare correspondence to team regarding settlement status.	\$1,010	0.2	\$202.00								
	1/22/2024 Howard, Kathryn M.	Review Class Action Position Statement including checking the legal citations and revising same.	\$325	0.7	\$227.50								
	1/22/2024 Howard, Kathryn M.	Finalize revisions.	\$325	0.2	\$65.00								
	1/22/2024 Howard, Kathryn M.	Prepare email to L. Valdez and C. Healey regarding the cite checked position statement.	\$325	0.1	\$32.50								
	1/24/2024 Healey, Christopher J.	Prepare correspondence regarding Position Statement regarding Class Period.	\$1,010	0.2	\$202.00								
	1/25/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding Sunrise settlement position.	\$1,010	0.3	\$303.00								
	1/25/2024 Healey, Christopher J.	Telephone conference with Attorney Marks regarding settlement status.	\$1,010	0.2	\$202.00								
	1/25/2024 Healey, Christopher J.	Prepare correspondence to team regarding settlement status.	\$1,010	0.5	\$505.00								
	1/25/2024 Healey, Christopher J.	Review and revise Umpierre Declaration in support of Position Statement.	\$1,010	0.5	\$505.00								
	1/25/2024 Healey, Christopher J.	Prepare correspondence regarding Position Statement regarding Class Period.	\$1,010	0.5	\$505.00								
	1/26/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Position Statement filing.	\$1,010	0.2	\$202.00								
	1/26/2024 Healey, Christopher J.	Review filing.	\$1,010	0.1	\$101.00								
	1/29/2024 Healey, Christopher J.	Telephone conference with Attorney Marks regarding settlement negotiations.	\$1,010	0.2	\$202.00								
	1/29/2024 Healey, Christopher J.	Review Sunrise injunction counter.	\$1,010	0.2	\$202.00								
	1/29/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding same.	\$1,010	0.1	\$101.00								
	1/29/2024 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding same.	\$1,010	0.2	\$202.00								
	1/29/2024 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding meet and confer letter.	\$1,010	0.1	\$101.00								
	1/30/2024 Healey, Christopher J.	Review Sunrise redline of injunction.	\$1,010	0.2	\$202.00								
	1/30/2024 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding team call.	\$1,010	0.1	\$101.00								
	1/30/2024 Healey, Christopher J.	Outline approach regarding Sunrise injunction counter.	\$1,010	0.2	\$202.00								
	1/30/2024 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.2	\$202.00								
	1/30/2024 Healey, Christopher J.	Revise injunction.	\$1,010	2.2	\$2,222.00								
	1/30/2024 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding same.	\$1,010	0.3	\$303.00								
	1/30/2024 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding draft injunction.	\$1,010	0.2	\$202.00								
	1/30/2024 Myrick, Tracy R.	Export portion of Operations Manual and provide to C. Healey.	\$195	0.1	\$19.50								
	1/31/2024 Healey, Christopher J.	Review Sunrise briefing regarding pendant data.	\$1,010	0.5	\$505.00								
	1/31/2024 Healey, Christopher J.	Revise injunction.	\$1,010	0.3	\$303.00								
	1/31/2024 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding same.	\$1,010	0.2	\$202.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	2/1/2024 Healey, Christopher J.	Review Attorney Marks' changes to injunction.	\$1,010	0.3									
	2/1/2024 Healey, Christopher J.	Correspondence regarding team call.	\$1,010	0.2									
	2/1/2024 Healey, Christopher J.	Revise injunction.	\$1,010	0.3									
	2/1/2024 Healey, Christopher J.	Correspondence with Attorney Stebner regarding team meeting.	\$1,010	0.1									
	2/1/2024 Healey, Christopher J.	Prepare correspondence to team explaining revisions to injunction.	\$1,010	1	\$1,010.00								
	2/2/2024 Healey, Christopher J.	Prepare for team call.	\$1,010	0.1	\$101.00								
	2/2/2024 Healey, Christopher J.	Team call regarding injunction and settlement.	\$1,010	0.5	\$505.00			0.5	505.00				
	2/2/2024 Healey, Christopher J.	Review injunction.	\$1,010	0.1	\$101.00								
	2/2/2024 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.1	\$101.00								
	2/5/2024 Healey, Christopher J.	Correspondence regarding draft injunction.	\$1,010	0.2	\$202.00								
	2/5/2024 Healey, Christopher J.	Review Court order regarding Defendants' sealing motion.	\$1,010	0.1	\$101.00								
	2/6/2024 Healey, Christopher J.	Correspondence with mediator regarding settlement status.	\$1,010	0.1	\$101.00								
	2/6/2024 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding same.	\$1,010	0.1	\$101.00								
	2/6/2024 Healey, Christopher J.	Follow-up correspondence regarding same.	\$1,010	0.1	\$101.00								
	2/7/2024 Healey, Christopher J.	Correspondence regarding class period settlement filing.	\$1,010	0.2	\$202.00								
	2/7/2024 Healey, Christopher J.	Review Sunrise's redline changes to injunction.	\$1,010	0.2	\$202.00								
	2/7/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding same.	\$1,010	0.2	\$202.00								
	2/7/2024 Healey, Christopher J.	Revise injunction.	\$1,010	0.5	\$505.00								
	2/8/2024 Healey, Christopher J.	Follow-up correspondence with Attorney Stebner regarding settlement issues and review Emeritus agreement.	\$1,010	0.3	\$303.00								
	2/8/2024 Healey, Christopher J.	Telephone conferences with Attorney Stebner regarding updated injunction.	\$1,010	0.6	\$606.00								
	2/8/2024 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.2	\$202.00								
	2/8/2024 Healey, Christopher J.	Revise injunction.	\$1,010	0.2	\$202.00								
	2/8/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding Charlie Lee update on injunction.	\$1,010	0.2	\$202.00								
	2/8/2024 Healey, Christopher J.	Draft list of information items required.	\$1,010	0.2	\$202.00								
	2/8/2024 Healey, Christopher J.	Prepare redline version of injunction.	\$1,010	0.2	\$202.00								
	2/8/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding injunction negotiation issues.	\$1,010	0.2	\$202.00								
	2/9/2024 Healey, Christopher J.	Follow-up call with Attorney Stebner regarding settlement status.	\$1,010	0.2	\$202.00								
	2/9/2024 Healey, Christopher J.	Telephone conference with Attorney Marks regarding pendant data issue.	\$1,010	0.1	\$101.00								
	2/9/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$1,010	0.1	\$101.00								
	2/9/2024 Healey, Christopher J.	Draft updated settlement status statement.	\$1,010	0.1	\$101.00								
	2/12/2024 Healey, Christopher J.	Review court order regarding class period issue.	\$1,010	0.1	\$101.00								
	2/12/2024 Healey, Christopher J.	Prepare correspondence regarding settlement position statement.	\$1,010	0.1	\$101.00								
	2/12/2024 Healey, Christopher J.	Review Sunrise counter regarding injunction.	\$1,010	1	\$1,010.00								
	2/12/2024 Healey, Christopher J.	Telephone conferences with Attorney Stebner regarding same.	\$1,010	0.3	\$303.00								
	2/12/2024 Healey, Christopher J.	Telephone conference with Attorneys Marks and Thornton regarding same.	\$1,010	0.5	\$505.00								
	2/12/2024 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding pendant data term.	\$1,010	0.5	\$505.00								
	2/12/2024 Healey, Christopher J.	Prepare correspondence to team regarding status.	\$1,010	0.2	\$202.00								
	2/13/2024 Healey, Christopher J.	Revise injunction.	\$1,010	0.2	\$202.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	2/13/2024 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding revised injunction.	\$1,010	0.3		\$303.00									
	2/13/2024 Healey, Christopher J.	Prepare correspondence to team regarding revised injunction and status.	\$1,010	0.2		\$202.00									
	2/13/2024 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding case scheduling statement.	\$1,010	0.2		\$202.00									
	2/13/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding Sunrise portion of pendant data.	\$1,010	0.2		\$202.00									
	2/13/2024 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding same.	\$1,010	0.2		\$202.00									
	2/13/2024 Healey, Christopher J.	Follow-up correspondence regarding same.	\$1,010	0.1		\$101.00									
	2/13/2024 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding follow-up questions regarding pendant data.	\$1,010	0.1		\$101.00									
	2/14/2024 Healey, Christopher J.	Correspondence regarding Sunrise call regarding pendent data.	\$1,010	0.1		\$101.00									
	2/14/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding status.	\$1,010	0.2		\$202.00									
	2/14/2024 Healey, Christopher J.	Revise injunction.	\$1,010	0.5		\$505.00									
	2/14/2024 Healey, Christopher J.	Correspondence with Attorney Stebner regarding same.	\$1,010	0.1		\$101.00									
	2/15/2024 Healey, Christopher J.	Correspondence with Attorney Marks' office regarding injunction.	\$1,010	0.2		\$202.00									
	2/15/2024 Healey, Christopher J.	Outline settlement agreement terms.	\$1,010	0.5		\$505.00									
	2/15/2024 Healey, Christopher J.	Review and revise letter regarding case scheduling issues.	\$1,010	0.3		\$303.00									
	2/15/2024 Healey, Christopher J.	Telephone conference with Attorney Marks regarding pendant data provision.	\$1,010	0.3		\$303.00									
	2/15/2024 Healey, Christopher J.	Revise injunction.	\$1,010	1		\$1,010.00									
	2/15/2024 Healey, Christopher J.	Telephone conferences with Attorney Stebner regarding injunction terms.	\$1,010	0.6		\$606.00									
	2/15/2024 Healey, Christopher J.	Telephone conference with Attorney Marks regarding same.	\$1,010	0.5		\$505.00									
	2/16/2024 Healey, Christopher J.	Correspondence with Attorney Stebner regarding Sunrise questions on injunction.	\$1,010	0.2		\$202.00									
	2/16/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding requested changes by Sunrise.	\$1,010	0.1		\$101.00									
	2/16/2024 Healey, Christopher J.	Revise injunction.	\$1,010	0.1		\$101.00									
	2/16/2024 Healey, Christopher J.	Correspondence with Attorney Marks regarding same.	\$1,010	0.2		\$202.00									
	2/16/2024 Healey, Christopher J.	Prepare correspondence to team regarding settlement status.	\$1,010	0.1		\$101.00									
	2/16/2024 Healey, Christopher J.	Outline settlement class notice.	\$1,010	0.1		\$101.00									
	2/16/2024 Healey, Christopher J.	Outline settlement agreement.	\$1,010	0.1		\$101.00									
	2/16/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding injunction changes and revise injunction.	\$1,010	0.1		\$101.00									
	2/16/2024 Healey, Christopher J.	Draft settlement agreement.	\$1,010	2		\$2,020.00									
	2/17/2024 Healey, Christopher J.	Research Judge Staton's cases regarding class approval motions/fee petitions.	\$1,010	1.2		\$1,212.00									
	2/18/2024 Healey, Christopher J.	Revise settlement agreement.	\$1,010	0.8		\$808.00									
	2/19/2024 Healey, Christopher J.	Outline class notice.	\$1,010	0.2		\$202.00									
	2/19/2024 Healey, Christopher J.	Revise settlement agreement.	\$1,010	2.5		\$2,525.00									
	2/19/2024 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding same.	\$1,010	0.3		\$303.00									
	2/20/2024 Healey, Christopher J.	Revise settlement agreement.	\$1,010	0.1		\$101.00									
	2/20/2024 Healey, Christopher J.	Prepare correspondence to Expert Kennedy regarding settlement.	\$1,010	0.1		\$101.00									
	2/20/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding case status report and settlement.	\$1,010	0.2		\$202.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>	
						<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	2/20/2024 Healey, Christopher J.	Draft settlement class notice.	\$1,010	3.2							
	2/21/2024 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding client approval on settlement agreement.	\$1,010	0.3	\$303.00						
	2/21/2024 Healey, Christopher J.	Prepare correspondence to team regarding status of settlement documentation.	\$1,010	0.2	\$202.00						
	2/21/2024 Healey, Christopher J.	Research regarding fee awards.	\$1,010	0.3	\$303.00						
	2/21/2024 Healey, Christopher J.	Correspondence with expert Kennedy's office.	\$1,010	0.1	\$101.00						
	2/21/2024 Healey, Christopher J.	Review revised class notice.	\$1,010	0.1	\$101.00						
	2/21/2024 Healey, Christopher J.	Further revisions to settlement documents.	\$1,010	0.3	\$303.00						
	2/21/2024 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.1	\$101.00						
	2/21/2024 Healey, Christopher J.	Correspondence with Attorney Warren regarding settlement documents.	\$1,010	0.1	\$101.00						
	2/21/2024 Healey, Christopher J.	Review and revise stat form of settlement notice.	\$1,010	1	\$1,010.00						
	2/22/2024 Healey, Christopher J.	Review and respond to Defendants' proposed status report.	\$1,010	0.2	\$202.00						
	2/22/2024 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$1,010	0.1	\$101.00						
	2/22/2024 Healey, Christopher J.	Prepare for call with Expert Kennedy regarding injunction valuation.	\$1,010	0.3	\$303.00						
	2/22/2024 Healey, Christopher J.	Telephone conference with Expert Kennedy regarding implementation valuation.	\$1,010	1	\$1,010.00						
	2/22/2024 Healey, Christopher J.	Prepare correspondence to Attorney Marks regarding support for expert valuation.	\$1,010	0.2	\$202.00						
	2/22/2024 Healey, Christopher J.	Telephone conference with Mr. Thornton regarding staffing shortfall analysis and injunction valuation.	\$1,010	0.2	\$202.00						
	2/22/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding case status stipulation.	\$1,010	0.1	\$101.00						
	2/23/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding case status report and Ganz stipulation.	\$1,010	0.2	\$202.00						
	2/23/2024 Healey, Christopher J.	Revise settlement agreement.	\$1,010	0.1	\$101.00						
	2/23/2024 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$1,010	0.1	\$101.00						
	2/23/2024 Healey, Christopher J.	Follow-up call with Attorney Umpierre regarding status report issue.	\$1,010	0.2	\$202.00						
	2/23/2024 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding client approval.	\$1,010	0.1	\$101.00						
	2/23/2024 Healey, Christopher J.	Prepare correspondence regarding preliminary approval motion.	\$1,010	0.1	\$101.00						
	2/26/2024 Healey, Christopher J.	Telephone conference with CPT (Julie Green) regarding settlement administration bid and related issues.	\$1,010	0.3	\$303.00						
	2/26/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding settlement documentation.	\$1,010	0.1	\$101.00						
	2/26/2024 Healey, Christopher J.	Research regarding Albraeep fee award.	\$1,010	1.5	\$1,515.00						
	2/27/2024 Healey, Christopher J.	Correspondence with Attorney Marks regarding supporting declaration for approval motion.	\$1,010	0.1	\$101.00						
	2/27/2024 Healey, Christopher J.	Prepare correspondence to team regarding settlement documentation.	\$1,010	0.1	\$101.00						
	2/27/2024 Healey, Christopher J.	Prepare correspondence regarding Sunrise response to settlement information request.	\$1,010	0.1	\$101.00						
	2/27/2024 Healey, Christopher J.	Research regarding class action fee awards.	\$1,010	1	\$1,010.00						
	2/27/2024 Healey, Christopher J.	Draft status report to family member witnesses.	\$1,010	0.2	\$202.00						
	2/27/2024 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.1	\$101.00						

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	2/27/2024 Healey, Christopher J.	Correspondence to Attorney Umpierre regarding Sunrise's position on settlement information.	\$1,010	0.1	\$101.00								
	2/28/2024 Healey, Christopher J.	Office conference regarding case scheduling order.	\$1,010	0.1	\$101.00								
	2/28/2024 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding Sunrise documentation to support injunction value.	\$1,010	0.2	\$202.00								
	2/28/2024 Healey, Christopher J.	Review court order regarding status conference and scheduling.	\$1,010	0.1	\$101.00								
	2/29/2024 Healey, Christopher J.	Revise correspondence to Sunrise's counsel regarding data requests.	\$1,010	0.1	\$101.00								
	2/29/2024 Healey, Christopher J.	Review L. Palette correspondence regarding data requests.	\$1,010	0.1	\$101.00								
	2/29/2024 Healey, Christopher J.	Telephone conference with P. Kennedy regarding same.	\$1,010	0.3	\$303.00								
	2/29/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Sunrise discovery position.	\$1,010	0.2	\$202.00								
	2/29/2024 Healey, Christopher J.	Review Aegis arbitration decision and analysis regarding impact on settlement comps.	\$1,010	0.2	\$202.00								
	2/29/2024 Healey, Christopher J.	Draft response to Sunrise on data requests.	\$1,010	0.7	\$707.00								
	2/29/2024 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.2	\$202.00								
	2/29/2024 Healey, Christopher J.	Prepare correspondence to L. Palette (Kennedy's office) regarding injunction valuation issues.	\$1,010	0.2	\$202.00								
	2/29/2024 Healey, Christopher J.	Research regarding fee awards.	\$1,010	1	\$1,010.00								
	3/1/2024 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding M/I fee data request.	\$1,010	0.1	\$101.00								
	3/1/2024 Healey, Christopher J.	Draft request to Sunrise regarding same.	\$1,010	0.1	\$101.00								
	3/1/2024 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding case status and fee application.	\$1,010	0.2	\$202.00								
	3/1/2024 Healey, Christopher J.	Research regarding fee awards.	\$1,010	1	\$1,010.00								
	3/2/2024 Healey, Christopher J.	Research regarding partial success rules on fee applications.	\$1,010	0.7	\$707.00								
	3/2/2024 Healey, Christopher J.	Outline approach regarding same.	\$1,010	0.3	\$303.00								
	3/4/2024 Healey, Christopher J.	Research regarding award decisions.	\$1,010	0.5	\$505.00								
	3/4/2024 Healey, Christopher J.	Outline arguments regarding fee application.	\$1,010	0.5	\$505.00								
	3/4/2024 Healey, Christopher J.	Review Sunrise's email regarding data request.	\$1,010	0.1	\$101.00								
	3/4/2024 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding same.	\$1,010	0.1	\$101.00								
	3/5/2024 Healey, Christopher J.	Review and comment regarding Flores declaration in support of settlement approval.	\$1,010	0.7	\$707.00								
	3/5/2024 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.2	\$202.00								
	3/6/2024 Healey, Christopher J.	Research regarding Judge Staton's class approval and fee award decisions.	\$1,010	1	\$1,010.00								
	3/6/2024 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding Grady rulings.	\$1,010	0.2	\$202.00								
	3/6/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Sunrise's data and follow-up.	\$1,010	0.2	\$202.00								
	3/6/2024 Healey, Christopher J.	Further research of Judge Staton's fee cases.	\$1,010	0.1	\$101.00								
	3/7/2024 Healey, Christopher J.	Review Attorney Gorman's email regarding settlement documentation.	\$1,010	0.1	\$101.00								
	3/7/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding response.	\$1,010	0.2	\$202.00								
	3/7/2024 Healey, Christopher J.	Draft response to Sunrise on data items.	\$1,010	0.2	\$202.00								
	3/7/2024 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding settlement documentation.	\$1,010	0.1	\$101.00								
	3/11/2024 Healey, Christopher J.	Review court rules regarding settlement approval.	\$1,010	0.2	\$202.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>			
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	3/11/2024 Healey, Christopher J.	Outline schedule.	\$1,010	0.3		\$303.00								
	3/11/2024 Healey, Christopher J.	Draft insert regarding fee request.	\$1,010	1.2		\$1,212.00								
	3/11/2024 Healey, Christopher J.	Prepare correspondence to team regarding status and fee application requirements.	\$1,010	0.3		\$303.00								
	3/12/2024 Healey, Christopher J.	Follow-up correspondence regarding injunction valuation analysis.	\$1,010	0.2		\$202.00								
	3/12/2024 Healey, Christopher J.	Review draft regression report regarding staffing analysis.	\$1,010	0.2		\$202.00								
	3/12/2024 Healey, Christopher J.	Telephone conference with Attorney Marks regarding same.	\$1,010	0.3		\$303.00								
	3/12/2024 Healey, Christopher J.	Prepare correspondence to P. Kennedy regarding regression analysis.	\$1,010	0.2		\$202.00								
	3/12/2024 Healey, Christopher J.	Prepare for Attorneys Marks' call.	\$1,010	0.2		\$202.00								
	3/12/2024 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding Sunrise facilities.	\$1,010	0.1		\$101.00								
	3/12/2024 Healey, Christopher J.	Draft inserts to fee application.	\$1,010	0.6		\$606.00								
	3/13/2024 Healey, Christopher J.	Correspondence regarding Sunrise's response to data requests.	\$1,010	0.1		\$101.00								
	3/13/2024 Healey, Christopher J.	Prepare correspondence regarding potential schedule for preliminary approval motion.	\$1,010	0.1		\$101.00								
	3/13/2024 Healey, Christopher J.	Draft fee application motion.	\$1,010	1		\$1,010.00								
	3/14/2024 Healey, Christopher J.	Outline inserts to fee application brief.	\$1,010	1		\$1,010.00								
	3/15/2024 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding status of Sunrise's comments to settlement agreement.	\$1,010	0.1		\$101.00								
	3/15/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$1,010	0.2		\$202.00								
	3/15/2024 Healey, Christopher J.	Review attorney fee award decisions.	\$1,010	1		\$1,010.00								
	3/18/2024 Healey, Christopher J.	Correspondence regarding Sunrise response to settlement agreement draft.	\$1,010	0.1		\$101.00								
	3/18/2024 Healey, Christopher J.	Draft inserts to fee application.	\$1,010	2.2		\$2,222.00								
	3/18/2024 Healey, Christopher J.	Correspondence to Attorney Stebner regarding settlement agreement status and negotiations.	\$1,010	0.5		\$505.00								
	3/18/2024 Healey, Christopher J.	Review Sunrise comments on settlement agreement.	\$1,010	1		\$1,010.00								
	3/19/2024 Healey, Christopher J.	Outline response to Sunrise on general information items.	\$1,010	0.1		\$101.00								
	3/19/2024 Healey, Christopher J.	Review correspondence from team regarding Sunrise edits to settlement agreement.	\$1,010	0.1		\$101.00								
	3/19/2024 Healey, Christopher J.	Revise settlement agreement.	\$1,010	1.8		\$1,818.00								
	3/19/2024 Healey, Christopher J.	Draft response to Sunrise on general information items.	\$1,010	0.7		\$707.00								
	3/19/2024 Healey, Christopher J.	Correspondence to team regarding status of settlement agreement negotiations.	\$1,010	0.3		\$303.00								
	3/19/2024 Healey, Christopher J.	Follow up correspondence with team regarding settlement terms.	\$1,010	0.1		\$101.00								
	3/20/2024 Healey, Christopher J.	Correspondence with Attorney Stebner regarding settlement status.	\$1,010	0.1		\$101.00								
	3/20/2024 Healey, Christopher J.	Correspondence with expert Kennedy's office regarding valuation analysis.	\$1,010	0.2		\$202.00								
	3/20/2024 Healey, Christopher J.	Outline preliminary approval motion.	\$1,010	1.2		\$1,212.00								
	3/21/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding settlement agreement and changes.	\$1,010	0.3		\$303.00								
	3/21/2024 Healey, Christopher J.	Follow up correspondence with Attorney Stebner regarding same.	\$1,010	0.1		\$101.00								
	3/21/2024 Healey, Christopher J.	Draft response to Sunrise position statement on data requests.	\$1,010	0.3		\$303.00								
	3/21/2024 Healey, Christopher J.	Revise settlement agreement.	\$1,010	0.8		\$808.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	3/21/2024 Healey, Christopher J.	Draft cover note to Sunrise regarding same.	\$1,010	0.7		\$707.00								
	3/21/2024 Healey, Christopher J.	Correspondence to team regarding response approved by Attorney Gibb on data issues.	\$1,010	0.3		\$303.00								
	3/22/2024 Healey, Christopher J.	Telephone conference with expert Kennedy regarding valuation analysis.	\$1,010	0.5		\$505.00								
	3/22/2024 Healey, Christopher J.	Follow up correspondence regarding same with expert Kennedy.	\$1,010	0.3		\$303.00								
	3/22/2024 Healey, Christopher J.	Follow up correspondence with Attorney Thornton regarding same.	\$1,010	0.1		\$101.00								
	3/22/2024 Healey, Christopher J.	Correspondence to team regarding settlement status.	\$1,010	0.2		\$202.00								
	3/22/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding Sunrise's question on settlement documents.	\$1,010	0.1		\$101.00								
	3/22/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre re Sunrise position on settlement documents.	\$1,010	0.2		\$202.00								
	3/22/2024 Healey, Christopher J.	Correspondence with Attorney Stebner regarding release language issue.	\$1,010	0.1		\$101.00								
	3/22/2024 Healey, Christopher J.	Follow up correspondence with Attorney Stebner regarding Sunrise's position on release terms.	\$1,010	0.3		\$303.00								
	3/22/2024 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding settlement status.	\$1,010	0.2		\$202.00								
	3/22/2024 Healey, Christopher J.	Correspondence to Attorney Umpierre regarding successor motion.	\$1,010	0.1		\$101.00								
	3/22/2024 Healey, Christopher J.	draft response to Sunrise counsel on open settlement provisions.	\$1,010	0.8		\$808.00								
	3/23/2024 Healey, Christopher J.	Draft preliminary approval motion.	\$1,010	2.8		\$2,828.00								
	3/23/2024 Healey, Christopher J.	Prepare correspondence to Attorney Stebner regarding settlement status.	\$1,010	0.1		\$101.00								
	3/24/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding settlement status.	\$1,010	0.1		\$101.00								
	3/24/2024 Healey, Christopher J.	Revise settlement agreement.	\$1,010	0.9		\$909.00								
	3/24/2024 Healey, Christopher J.	Draft cover letter to Sunrise's counsel regarding same.	\$1,010	0.5		\$505.00								
	3/24/2024 Healey, Christopher J.	Correspondence with Attorney Wallace regarding potential SOL reservation language.	\$1,010	0.2		\$202.00								
	3/24/2024 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding preliminary approval motion.	\$1,010	0.2		\$202.00								
	3/25/2024 Healey, Christopher J.	Prepare correspondence regarding research on approval standard.	\$1,010	0.2		\$202.00								
	3/25/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding quick pay provision.	\$1,010	0.1		\$101.00								
	3/25/2024 Healey, Christopher J.	Prepare correspondence to CPT regarding bid.	\$1,010	0.1		\$101.00								
	3/25/2024 Healey, Christopher J.	Review correspondence regarding settlement status.	\$1,010	0.1		\$101.00								
	3/25/2024 Healey, Christopher J.	Review and comment regarding Ganz successor motion.	\$1,010	0.2		\$202.00								
	3/25/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding release provision.	\$1,010	0.2		\$202.00								
	3/25/2024 Healey, Christopher J.	Revise release provision.	\$1,010	0.3		\$303.00								
	3/25/2024 Healey, Christopher J.	Outline settlement schedule.	\$1,010	0.3		\$303.00								
	3/25/2024 Healey, Christopher J.	Prepare correspondence to CPT regarding bid for claims administration/notice.	\$1,010	0.1		\$101.00								
	3/26/2024 Healey, Christopher J.	Prepare correspondence to Lindsay Pettite regarding DLR formula.	\$1,010	0.1		\$101.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	3/26/2024 Healey, Christopher J.	Correspondence with Attorneys Stebner and Umpierre regarding quick pay provision.	\$1,010	0.2		\$202.00									
	3/26/2024 Healey, Christopher J.	Research regarding quick pay provision.	\$1,010	0.3		\$303.00									
	3/26/2024 Healey, Christopher J.	Prepare correspondence to Sunrise's counsel regarding same.	\$1,010	0.2		\$202.00									
	3/26/2024 Healey, Christopher J.	Telephone conference with L. Petitte regarding injunction valuation analysis.	\$1,010	0.5		\$505.00									
	3/26/2024 Healey, Christopher J.	Review Sunrise's documents regarding base fee charges.	\$1,010	0.5		\$505.00									
	3/26/2024 Healey, Christopher J.	Draft correspondence regarding potential valuation argument as to base fees.	\$1,010	0.5		\$505.00									
	3/27/2024 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding case schedule.	\$1,010	0.2		\$202.00									
	3/27/2024 Healey, Christopher J.	Draft letter to Sunrise regarding case schedule.	\$1,010	0.7		\$707.00									
	3/27/2024 Healey, Christopher J.	Telephone conferences with Kennedy's office regarding valuation analysis.	\$1,010	0.8		\$808.00									
	3/27/2024 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Sunrise's proposed revisions to settlement agreement.	\$1,010	0.2		\$202.00									
	3/27/2024 Healey, Christopher J.	Review Sunrise's changes.	\$1,010	0.2		\$202.00									
	3/27/2024 Healey, Christopher J.	Revise settlement agreement.	\$1,010	0.6		\$606.00									
	3/27/2024 Healey, Christopher J.	Prepare correspondence to Sunrise's counsel regarding updated settlement agreement.	\$1,010	0.3		\$303.00									
	3/27/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding settlement agreement.	\$1,010	0.1		\$101.00									
	3/27/2024 Healey, Christopher J.	Further revisions to agreement.	\$1,010	0.1		\$101.00									
	3/27/2024 Healey, Christopher J.	Prepare correspondence to Sunrise's counsel regarding same.	\$1,010	0.1		\$101.00									
	3/28/2024 Healey, Christopher J.	Correspondence with CPT regarding class notice bid.	\$1,010	0.2		\$202.00									
	3/28/2024 Healey, Christopher J.	Draft status report.	\$1,010	0.2		\$202.00									
	3/28/2024 Healey, Christopher J.	Prepare correspondence to Sunrise's counsel regarding same.	\$1,010	0.1		\$101.00									
	3/28/2024 Healey, Christopher J.	Correspondence with CPT and Sunrise's counsel regarding CPT bid.	\$1,010	0.5		\$505.00									
	3/28/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding class member information list.	\$1,010	0.1		\$101.00									
	3/28/2024 Healey, Christopher J.	Revise settlement stipulation.	\$1,010	0.3		\$303.00									
	3/28/2024 Healey, Christopher J.	Prepare correspondence to Sunrise's counsel regarding final settlement agreement.	\$1,010	0.2		\$202.00									
	3/28/2024 Healey, Christopher J.	Review CPT bid.	\$1,010	0.1		\$101.00									
	3/30/2024 Healey, Christopher J.	Draft preliminary approval motion.	\$1,010	1.5		\$1,515.00									
	3/30/2024 Healey, Christopher J.	Prepare correspondence regarding final settlement documents.	\$1,010	0.2		\$202.00									
	4/1/2024 Healey, Christopher J.	Draft preliminary approval motion.	\$1,010	2.5		\$2,525.00									
	4/1/2024 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding settlement stipulation execution.	\$1,010	0.1		\$101.00									
	4/1/2024 Myrick, Tracy R.	Pull production records in relation to Injunction Analysis and provide to caseteam per C. Healey.	\$195	0.3		\$58.50									
	4/1/2024 Myrick, Tracy R.	Pull production records in relation to Base Fee Valuation Concept and provide to caseteam per C. Healey.	\$195	0.3		\$58.50									
	4/2/2024 Healey, Christopher J.	Draft preliminary approval motion.	\$1,010	3.2		\$3,232.00									
	4/3/2024 Healey, Christopher J.	Review correspondence regarding Gibson comments on class notice.	\$1,010	0.1		\$101.00									
	4/3/2024 Healey, Christopher J.	Draft response regarding same.	\$1,010	0.2		\$202.00									
	4/3/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$1,010	0.1		\$101.00									

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	4/3/2024 Healey, Christopher J.	Prepare correspondence to Attorney Yarnall regarding declaration in support of preliminary approval motion.	\$1,010	0.1	\$101.00								
	4/3/2024 Healey, Christopher J.	Draft preliminary approval motion.	\$1,010	2.9	\$2,929.00								
	4/4/2024 Healey, Christopher J.	Telephone conference with team members (Umpierre/Yarnall/Ellis) regarding preliminary approval and support.	\$1,010	0.3	\$303.00								
	4/4/2024 Healey, Christopher J.	Correspondence with Attorney Wallace regarding preliminary approval motion.	\$1,010	0.1	\$101.00								
	4/4/2024 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding preliminary approval motion and support.	\$1,010	0.1	\$101.00								
	4/4/2024 Healey, Christopher J.	Draft preliminary approval motion.	\$1,010	3.5	\$3,535.00								
	4/5/2024 Healey, Christopher J.	Continue drafting preliminary approval motion.	\$1,010	3.2	\$3,232.00								
	4/5/2024 Healey, Christopher J.	Review Attorney Umpierre's correspondence regarding inserts to preliminary approval motion.	\$1,010	0.1	\$101.00								
	4/5/2024 Healey, Christopher J.	Review caselaw regarding consideration of statutory damages and treble damages.	\$1,010	0.5	\$505.00								
	4/5/2024 Valero, Carmen A.	Research 9th circuit cases re consideration of potential recovery of statutory or punitive damages when assessing the value of claims in a class action settlement, for C. Healey.	\$360	2	\$720.00								
	4/6/2024 Healey, Christopher J.	Draft preliminary approval motion.	\$1,010	2.5	\$2,525.00								
	4/7/2024 Healey, Christopher J.	Review Attorney Umpierre's email regarding proposed inserts to preliminary approval motion.	\$1,010	0.2	\$202.00								
	4/7/2024 Healey, Christopher J.	Draft preliminary approval motion.	\$1,010	2.2	\$2,222.00								
	4/8/2024 Healey, Christopher J.	Draft preliminary approval motion.	\$1,010	4.6	\$4,646.00	2.3	2323						
	4/8/2024 Healey, Christopher J.	Revise case exposure analysis.	\$1,010	1	\$1,010.00								
	4/8/2024 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding draft preliminary approval motion.	\$1,010	0.2	\$202.00								
	4/9/2024 Healey, Christopher J.	Review correspondence regarding Sunrise's responses to information requests.	\$1,010	0.2	\$202.00								
	4/9/2024 Healey, Christopher J.	Draft preliminary approval motion.	\$1,010	3	\$3,030.00								
	4/9/2024 Healey, Christopher J.	Review correspondence from Attorney Umpierre regarding same.	\$1,010	0.2	\$202.00								
	4/9/2024 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding draft preliminary approval motion.	\$1,010	0.3	\$303.00								
	4/10/2024 Healey, Christopher J.	Draft preliminary approval motion.	\$1,010	1.5	\$1,515.00								
	4/10/2024 Healey, Christopher J.	Revise preliminary approval motion.	\$1,010	4.2	\$4,242.00	2.1	2121						
	4/10/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding same.	\$1,010	0.2	\$202.00								
	4/10/2024 Healey, Christopher J.	Draft Healey declaration in support of preliminary approval motion.	\$1,010	1.5	\$1,515.00								
	4/10/2024 Healey, Christopher J.	Prepare correspondence to Attorney Gorman regarding move-in fee estimate.	\$1,010	0.2	\$202.00								
	4/10/2024 Healey, Christopher J.	Review comparable settlement and prepare summary chart.	\$1,010	1	\$1,010.00								
	4/10/2024 Howard, Kathryn M.	Review email from L. Valdez regarding the Motion for Preliminary Approval.	\$325	0.1	\$32.50								
	4/10/2024 Howard, Kathryn M.	Prepare responsive email to L. Valdez regarding same.	\$325	0.1	\$32.50								
	4/10/2024 Howard, Kathryn M.	Analysis of Memorandum of Points and Authorities in support of Motion for Preliminary Approval of Class Settlement including checking the cited cases, quotations and shepardizing cited cases for good case law.	\$325	2.9	\$942.50								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/10/2024 Howard, Kathryn M.	Revise Memorandum of Points and Authorities in support of Motion for Preliminary Approval of Class Settlement.	\$325	0.4		\$130.00									
	4/10/2024 Howard, Kathryn M.	Finalize pleading.	\$325	0.3		\$97.50									
	4/10/2024 Howard, Kathryn M.	Prepare email to C. Healy regarding same.	\$325	0.1		\$32.50									
	4/10/2024 Myrick, Tracy R.	Gather and provide Plaintiff, Defendant Expert Witnesses, and Third Party Production details to C. Healey.	\$195	0.5		\$97.50									
	4/11/2024 Healey, Christopher J.	Review Flores declaration and prepare correspondence to Attorney Umpierre regarding class notice language.	\$1,010	0.2		\$202.00									
	4/11/2024 Healey, Christopher J.	Prepare correspondence to Kennedy's office regarding damage analysis.	\$1,010	0.2		\$202.00									
	4/11/2024 Healey, Christopher J.	Analysis of comparative settlements.	\$1,010	0.5		\$505.00									
	4/11/2024 Healey, Christopher J.	Prepare chart regarding same.	\$1,010	1		\$1,010.00									
	4/11/2024 Healey, Christopher J.	Draft Healey declaration ISO motion for preliminary approval	\$1,010	6.5		\$6,565.00									
	4/12/2024 Healey, Christopher J.	Revise supporting declarations.	\$1,010	2.5		\$2,525.00									
	4/12/2024 Healey, Christopher J.	Revise notice of motion.	\$1,010	0.1		\$101.00									
	4/12/2024 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding settlement status and approval hearing.	\$1,010	0.1		\$101.00									
	4/12/2024 Healey, Christopher J.	Revise settlement documentation.	\$1,010	0.5		\$505.00									
	4/12/2024 Healey, Christopher J.	Revise preliminary approval motion.	\$1,010	2.5		\$2,525.00									
	4/12/2024 Healey, Christopher J.	Correspondence with Attorney Gorman regarding settlement documents and preliminary approval hearing date.	\$1,010	0.5		\$505.00									
	4/12/2024 Healey, Christopher J.	Telephone conference with L. Petitte regarding Kennedy declaration.	\$1,010	0.3		\$303.00									
	4/14/2024 Healey, Christopher J.	Revise settlement stipulation.	\$1,010	0.3		\$303.00									
	4/14/2024 Healey, Christopher J.	Revise class notice.	\$1,010	0.3		\$303.00									
	4/14/2024 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding same.	\$1,010	0.2		\$202.00									
	4/14/2024 Healey, Christopher J.	Follow-up correspondence regarding same.	\$1,010	0.2		\$202.00									
	4/15/2024 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding settlement documentation.	\$1,010	0.1		\$101.00									
	4/15/2024 Healey, Christopher J.	Revise preliminary approval motion.	\$1,010	1.5		\$1,515.00	1	1,010.00							
	4/15/2024 Healey, Christopher J.	Revise Healey declaration.	\$1,010	1.2		\$1,212.00									
	4/15/2024 Healey, Christopher J.	Prepare correspondence to Kennedy's office regarding supporting declaration.	\$1,010	0.2		\$202.00									
	4/15/2024 Healey, Christopher J.	Review correspondence from Attorney Gorman regarding Cupertino/Orange.	\$1,010	0.1		\$101.00									
	4/15/2024 Healey, Christopher J.	Review Sunrise's comments regarding preliminary approval motion.	\$1,010	0.2		\$202.00									
	4/15/2024 Healey, Christopher J.	Telephone conference with Attorney Marks regarding fee application.	\$1,010	0.1		\$101.00									
	4/16/2024 Healey, Christopher J.	Correspondence with Attorney Wallace regarding preliminary approval hearing.	\$1,010	0.1		\$101.00									
	4/16/2024 Healey, Christopher J.	Correspondence with Attorney Umpierre regarding settlement stipulation.	\$1,010	0.2		\$202.00									
	4/16/2024 Healey, Christopher J.	Telephone conference with L. Petitte regarding Kennedy declaration.	\$1,010	0.3		\$303.00									
	4/16/2024 Healey, Christopher J.	Review and comment on draft Kennedy declaration.	\$1,010	1		\$1,010.00									
	4/16/2024 Healey, Christopher J.	Telephone conference with Attorney Thornton regarding base fee issue.	\$1,010	0.2		\$202.00									
	4/16/2024 Healey, Christopher J.	Review correspondence regarding settlement stipulation.	\$1,010	0.2		\$202.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	4/17/2024 Healey, Christopher J.	Prepare correspondence to team regarding preliminary approval motion and status.	\$1,010	0.1		\$101.00								
	4/17/2024 Healey, Christopher J.	Correspondence with L. Petite regarding Kennedy declaration.	\$1,010	0.2		\$202.00								
	4/17/2024 Healey, Christopher J.	Telephone conference with Attorney Umpierre regarding preliminary approval motion.	\$1,010	0.5		\$505.00								
	4/17/2024 Healey, Christopher J.	Review court calendar and prepare correspondence regarding hearing date.	\$1,010	0.1		\$101.00								
	4/17/2024 Healey, Christopher J.	Review and revise Healey declaration.	\$1,010	0.2		\$202.00								
	4/17/2024 Healey, Christopher J.	Review and revise preliminary approval motion.	\$1,010	0.3		\$303.00								
	4/17/2024 Healey, Christopher J.	Prepare correspondence regarding preliminary approval filing.	\$1,010	0.1		\$101.00								
	4/17/2024 Healey, Christopher J.	Further revisions to preliminary approval motion and Healey declaration.	\$1,010	0.5		\$505.00								
	4/22/2024 Healey, Christopher J.	Review and comment regarding draft family member declaration in support of settlement approval.	\$1,010	0.7		\$707.00								
	4/22/2024 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.3		\$303.00								
	4/23/2024 Healey, Christopher J.	Telephone conference with Attorney Wallace.	\$1,010	0.3		\$303.00								
	4/24/2024 Healey, Christopher J.	Review timing on final approval motion.	\$1,010	0.1		\$101.00								
	4/24/2024 Healey, Christopher J.	Review cases regarding real estate report and application.	\$1,010	0.9		\$909.00								
	4/25/2024 Healey, Christopher J.	Prepare correspondence to C. Valero regarding follow-up research on real rate report.	\$1,010	0.3		\$303.00								
	4/25/2024 Healey, Christopher J.	Prepare correspondence to team regarding fee application and lodestar.	\$1,010	0.3		\$303.00								
	4/25/2024 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding fee application issues.	\$1,010	0.2		\$202.00								
	4/25/2024 Healey, Christopher J.	Telephone conference with Attorney Marks regarding fee application issues.	\$1,010	0.1		\$101.00								
	4/26/2024 Healey, Christopher J.	Outline fee application.	\$1,010	1		\$1,010.00								
	4/29/2024 Healey, Christopher J.	Correspondence with team regarding fee application preparation.	\$1,010	0.1		\$101.00								
	4/29/2024 Healey, Christopher J.	Telephone conference with Attorney Thamer regarding fee application.	\$1,010	0.1		\$101.00								
	4/30/2024 Healey, Christopher J.	Prepare correspondence regarding fee application preparation.	\$1,010	0.1		\$101.00								
	5/1/2024 Healey, Christopher J.	Review Gibson email regarding Sunrise's initial class list.	\$1,010	0.1		\$101.00								
	5/1/2024 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding Sunrise initial class list.	\$1,010	0.1		\$101.00								
	5/1/2024 Healey, Christopher J.	Prepare correspondence to team regarding preliminary approval motion.	\$1,010	0.2		\$202.00								
	5/1/2024 Healey, Christopher J.	Review correspondence regarding firm lodestar.	\$1,010	0.2		\$202.00								
	5/1/2024 Healey, Christopher J.	Prepare summary of firm lodestar.	\$1,010	0.2		\$202.00								
	5/2/2024 Healey, Christopher J.	Review Dentons' lodestar and revise.	\$1,010	0.5		\$505.00								
	5/2/2024 Healey, Christopher J.	Outline fee application support.	\$1,010	0.5		\$505.00								
	5/2/2024 Healey, Christopher J.	Follow-up correspondence regarding fee application support.	\$1,010	0.1		\$101.00								
	5/3/2024 Healey, Christopher J.	Review correspondence regarding CAFA notice.	\$1,010	0.1		\$101.00								
	5/3/2024 Healey, Christopher J.	Review CAFA statute and telephone conference with Attorney Umpierre regarding same.	\$1,010	0.1		\$101.00								
	5/3/2024 Healey, Christopher J.	Prepare correspondence to CPT regarding CAFA notice costs.	\$1,010	0.1		\$101.00								
	5/7/2024 Healey, Christopher J.	Review draft CAFA notice.	\$1,010	0.1		\$101.00								
	5/7/2024 Healey, Christopher J.	Draft correspondence regarding proposed changes to notice.	\$1,010	0.1		\$101.00								
	5/7/2024 Healey, Christopher J.	Prepare correspondence to Attorney Thamer regarding same.	\$1,010	0.1		\$101.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>	<u>Fees</u>	<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	5/8/2024 Healey, Christopher J.	Review correspondence regarding CAFA notice.	\$1,010	0.1	\$101.00								
	5/8/2024 Healey, Christopher J.	Review updated CPT bid.	\$1,010	0.1	\$101.00								
	5/9/2024 Healey, Christopher J.	Review Stebner's Lodestar summary.	\$1,010	0.1	\$101.00								
	5/9/2024 Healey, Christopher J.	Revise Lodestar summary.	\$1,010	0.1	\$101.00								
	5/9/2024 Healey, Christopher J.	Prepare correspondence regarding Lodestar summary.	\$1,010	0.1	\$101.00								
	5/10/2024 Healey, Christopher J.	Review Real Rate Report.	\$1,010	0.2	\$202.00								
	5/10/2024 Healey, Christopher J.	Correspondence with Attorney Wallace regarding Real Rate Report.	\$1,010	0.3	\$303.00								
	5/10/2024 Healey, Christopher J.	Correspondence regarding Sunrise inquiry on Preliminary Approval hearing.	\$1,010	0.1	\$101.00								
	5/10/2024 Healey, Christopher J.	Office conference regarding fee application exhibits.	\$1,010	0.2	\$202.00								
	5/10/2024 Healey, Christopher J.	Correspondence to team regarding preliminary approval motion.	\$1,010	0.1	\$101.00								
	5/10/2024 Healey, Christopher J.	Prepare correspondence regarding lodestar review.	\$1,010	0.2	\$202.00								
	5/10/2024 Healey, Christopher J.	Draft reply brief on preliminary approval motion.	\$1,010	0.5	\$505.00								
	5/29/2024 Healey, Christopher J.	Prepare for preliminary approval hearing.	\$1,010	0.9	\$909.00								
	5/29/2024 Healey, Christopher J.	Correspondence with Attorney Wallace regarding same.	\$1,010	0.2	\$202.00								
	5/30/2024 Healey, Christopher J.	Office conference regarding preliminary approval hearing.	\$1,010	0.1	\$101.00								
	5/30/2024 Healey, Christopher J.	Correspondence regarding same.	\$1,010	0.1	\$101.00								
	5/30/2024 Healey, Christopher J.	Prepare for preliminary approval hearing.	\$1,010	2	\$2,020.00								
	5/30/2024 Healey, Christopher J.	Travel to Los Angeles for preliminary approval hearing (and prepare during travel).	\$1,010	2	\$2,020.00							2	2,020.00
	5/31/2024 Healey, Christopher J.	Prepare for preliminary approval hearing.	\$1,010	1.5	\$1,515.00								
	5/31/2024 Healey, Christopher J.	Attended preliminary approval hearing.	\$1,010	1.2	\$1,212.00								
	5/31/2024 Healey, Christopher J.	Return travel to San Diego.	\$1,010	1.5	\$1,515.00							1.5	1,515.00
	5/31/2024 Healey, Christopher J.	Status report to team regarding preliminary approval hearing.	\$1,010	0.2	\$202.00								
	5/31/2024 Healey, Christopher J.	Draft outline of settlement payment allocation.	\$1,010	0.8	\$808.00								
	6/3/2024 Healey, Christopher J.	Outline Settlement Agreement Addendum regarding allocation of settlement payments.	\$1,010	0.5	\$505.00								
	6/3/2024 Healey, Christopher J.	Correspondence with team regarding same.	\$1,010	0.2	\$202.00								
	6/3/2024 Healey, Christopher J.	Correspondence with CPT regarding status.	\$1,010	0.1	\$101.00								
	6/3/2024 Healey, Christopher J.	Correspondence with Attorney Gorman regarding same.	\$1,010	0.1	\$101.00								
	6/3/2024 Healey, Christopher J.	Draft settlement addendum.	\$1,010	1.3	\$1,313.00								
	6/4/2024 Healey, Christopher J.	Further revisions to settlement agreement addendum.	\$1,010	0.2	\$202.00								
	6/4/2024 Healey, Christopher J.	Prepare correspondence to Attorney Gorman regarding same.	\$1,010	0.2	\$202.00								
	6/4/2024 Healey, Christopher J.	Outline revisions to class notice.	\$1,010	0.2	\$202.00								
	6/4/2024 Healey, Christopher J.	Outline supplemental brief in support of preliminary approval.	\$1,010	0.2	\$202.00								
	6/4/2024 Healey, Christopher J.	Revise addendum to settlement stipulation.	\$1,010	0.5	\$505.00								
	6/4/2024 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.1	\$101.00								
	6/6/2024 Healey, Christopher J.	Prepare correspondence to Attorney Gorman regarding draft Addendum.	\$1,010	0.1	\$101.00								
	6/6/2024 Healey, Christopher J.	Review Attorney Gorman's correspondence regarding same.	\$1,010	0.1	\$101.00								
	6/7/2024 Healey, Christopher J.	Correspondence with Attorney Gorman regarding Settlement Stipulation Addendum.	\$1,010	0.1	\$101.00								
	6/7/2024 Healey, Christopher J.	Correspondence to CPT regarding Addendum.	\$1,010	0.2	\$202.00								
	6/7/2024 Healey, Christopher J.	Outline supplemental brief in support of preliminary approval.	\$1,010	0.1	\$101.00								
	6/7/2024 Healey, Christopher J.	Draft supplemental brief.	\$1,010	0.5	\$505.00								
	6/9/2024 Healey, Christopher J.	Revise class notice forms to conform to Addendum changes.	\$1,010	0.1	\$101.00								
	6/9/2024 Healey, Christopher J.	Review Sunrise's class list.	\$1,010	0.4	\$404.00								

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	6/10/2024 Healey, Christopher J.	Draft supplemental brief in support of preliminary approval motion.	\$1,010	1		\$1,010.00									
	6/10/2024 Healey, Christopher J.	Revise class notice to conform with Addendum.	\$1,010	0.5		\$505.00									
	6/10/2024 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.1		\$101.00									
	6/10/2024 Healey, Christopher J.	Prepare correspondence to Attorney Gorman regarding revised class notice.	\$1,010	0.1		\$101.00									
	6/10/2024 Healey, Christopher J.	Correspondence regarding Addendum.	\$1,010	0.1		\$101.00									
	6/11/2024 Healey, Christopher J.	Correspondence with Attorney Gorman regarding Addendum.	\$1,010	0.1		\$101.00									
	6/12/2024 Healey, Christopher J.	Correspondence with CPT regarding revised bid to reflect Addendum change.	\$1,010	0.1		\$101.00									
	6/12/2024 Healey, Christopher J.	Revise supplemental brief.	\$1,010	1.8		\$1,818.00									
	6/13/2024 Healey, Christopher J.	Review Attorney Umpierre's comments regarding supplemental brief regarding preliminary approval.	\$1,010	0.1		\$101.00									
	6/13/2024 Healey, Christopher J.	Revise supplemental brief.	\$1,010	0.1		\$101.00									
	6/13/2024 Healey, Christopher J.	Correspondence to Attorney Gorman regarding revised supplemental brief.	\$1,010	0.1		\$101.00									
	6/14/2024 Healey, Christopher J.	Review Sunrise's changes to supplemental brief.	\$1,010	0.2		\$202.00									
	6/14/2024 Healey, Christopher J.	Revise supplemental brief in support of preliminary approval.	\$1,010	0.7		\$707.00									
	6/14/2024 Healey, Christopher J.	Prepare correspondence to Attorney Gorman regarding same.	\$1,010	0.2		\$202.00									
	6/14/2024 Healey, Christopher J.	Further revisions to supplemental brief.	\$1,010	0.2		\$202.00									
	6/27/2024 Healey, Christopher J.	Review Court order regarding preliminary approval motion.	\$1,010	0.1		\$101.00									
	6/27/2024 Healey, Christopher J.	Prepare correspondence to team regarding same.	\$1,010	0.1		\$101.00									
	7/1/2024 Healey, Christopher J.	Prepare correspondence to Judicate West regarding case status.	\$1,010	0.1		\$101.00									
	7/1/2024 Healey, Christopher J.	Prepare correspondence to CPT regarding case status.	\$1,010	0.1		\$101.00									
	7/1/2024 Healey, Christopher J.	Prepare correspondence to Attorney Umpierre regarding settlement status call.	\$1,010	0.1		\$101.00									
	7/2/2024 Healey, Christopher J.	Prepare for team call regarding settlement status.	\$1,010	0.2		\$202.00									
	7/2/2024 Healey, Christopher J.	Prepare to-do list regarding settlement issues.	\$1,010	0.2		\$202.00									
	7/2/2024 Healey, Christopher J.	Telephone conference with team regarding settlement status and to-do issues.	\$1,010	0.2		\$202.00				0.2		202			
	7/17/2024 Healey, Christopher J.	Correspondence with CPT regarding settlement status.	\$1,010	0.1		\$101.00									
	7/17/2024 Healey, Christopher J.	Correspondence regarding fee application.	\$1,010	0.1		\$101.00									
	7/23/2024 Healey, Christopher J.	Draft status request to Court regarding pending preliminary approval motion.	\$1,010	0.1		\$101.00									
	7/23/2024 Healey, Christopher J.	Office conference regarding same.	\$1,010	0.1		\$101.00									
	7/24/2024 Healey, Christopher J.	Correspondence regarding status inquiry request to Court.	\$1,010	0.1		\$101.00									
	7/24/2024 Healey, Christopher J.	Review Court statement regarding motion status.	\$1,010	0.1		\$101.00									
	7/25/2024 Healey, Christopher J.	Review Hearden arbitration decision and analysis regarding same.	\$1,010	0.3		\$303.00									
	7/26/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding status.	\$1,010	0.1		\$101.00									
	7/26/2024 Healey, Christopher J.	Review AG request for CAFA information regarding settlement.	\$1,010	0.1		\$101.00									
	7/26/2024 Healey, Christopher J.	Correspondence to team regarding same.	\$1,010	0.1		\$101.00									
	7/26/2024 Healey, Christopher J.	Review court order granting preliminary settlement approval.	\$1,010	0.2		\$202.00									
	7/26/2024 Healey, Christopher J.	Status correspondence to team regarding same.	\$1,010	0.2		\$202.00									
	7/26/2024 Healey, Christopher J.	Prepare correspondence to AG regarding call to discuss settlement.	\$1,010	0.2		\$202.00									
	7/29/2024 Healey, Christopher J.	Correspondence with AG and other counsel regarding CAFA call.	\$1,010	0.2		\$202.00									
	7/29/2024 Healey, Christopher J.	Correspondence with CPT regarding preliminary approval order and electronic opt-out issue.	\$1,010	0.2		\$202.00									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>						
				<u>Worked</u>			<u>General</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	7/29/2024 Healey, Christopher J.	Review court deadlines and revise settlement timeline.	\$1,010	0.2									
	7/29/2024 Healey, Christopher J.	Revise class notice to address court order.	\$1,010	0.2									
	7/29/2024 Healey, Christopher J.	Draft correspondence to opposing counsel regarding same.	\$1,010	0.2									
	7/29/2024 Healey, Christopher J.	Outline presentation to AG office regarding settlement.	\$1,010	1.5									
	7/30/2024 Healey, Christopher J.	Correspondence with Attorney Gorman regarding case schedule.	\$1,010	0.1									
	7/30/2024 Healey, Christopher J.	Prepare for call with Attorney Gorman regarding schedule.	\$1,010	0.4									
	7/30/2024 Healey, Christopher J.	Telephone conference with Attorney Gorman regarding same.	\$1,010	0.4									
	7/30/2024 Healey, Christopher J.	Correspondence to CPT regarding opt-out provision issue.	\$1,010	0.1									
	7/30/2024 Healey, Christopher J.	Telephone call with CPT regarding same.	\$1,010	0.1									
	7/30/2024 Healey, Christopher J.	Correspondence to Attorney Gorman regarding class list information.	\$1,010	0.1									
	7/30/2024 Healey, Christopher J.	Correspondence with CPT regarding electronic opt-out feature.	\$1,010	0.2									
	7/30/2024 Healey, Christopher J.	Telephone conference with CPT representative regarding electronic opt-out and updated procedures.	\$1,010	0.2									
	7/30/2024 Healey, Christopher J.	Telephone conference with CPT regarding email alternative for opt-out.	\$1,010	0.2									
	7/30/2024 Healey, Christopher J.	Correspondence to Attorney Gorman regarding same.	\$1,010	0.1									
	7/31/2024 Healey, Christopher J.	Correspondence to Sunrise counsel regarding revised class notice forms.	\$1,010	0.1									
	7/31/2024 Healey, Christopher J.	Revise long/short form class notices to address electronic opt-out for exclusion request.	\$1,010	0.8									
	7/31/2024 Healey, Christopher J.	Telephone call with CPT regarding class notice and settlement.	\$1,010	0.2									
	7/31/2024 Healey, Christopher J.	Correspondence to CANHR regarding California Attorney General's office.	\$1,010	0.1									
	7/31/2024 Healey, Christopher J.	Correspondence with Attorney Gorman regarding class notice revisions.	\$1,010	0.2									
	7/31/2024 Healey, Christopher J.	Draft Plaintiffs' statement of compliance regarding class notice changes.	\$1,010	0.5									
	8/1/2024 Healey, Christopher J.	Revise Plaintiffs' compliance statement.	\$1,010	0.2									
	8/1/2024 Healey, Christopher J.	Revise updated class notice.	\$1,010	0.1									
	8/1/2024 Healey, Christopher J.	Prepare for Attorney General call.	\$1,010	0.1									
	8/1/2024 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Attorney General meeting.	\$1,010	0.1									
	8/1/2024 Healey, Christopher J.	Correspondence with Attorney Gorman regarding updated class notice.	\$1,010	0.1									
	8/2/2024 Healey, Christopher J.	Prepare for Attorney General call.	\$1,010	0.5									
	8/2/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding Attorney General call.	\$1,010	0.1									
	8/2/2024 Healey, Christopher J.	Attend Attorney General call regarding settlement approval.	\$1,010	1									
	8/2/2024 Healey, Christopher J.	Correspondence regarding compliance statement.	\$1,010	0.1									
	8/2/2024 Healey, Christopher J.	Prepare correspondence to team regarding Attorney General call.	\$1,010	0.1									
	8/2/2024 Healey, Christopher J.	Telephone conference with Attorney Wallace regarding Attorney General call.	\$1,010	0.1									
	8/2/2024 Healey, Christopher J.	Telephone conference with Attorney Stebner regarding Attorney General call and follow-up.	\$1,010	0.1									
	8/2/2024 Healey, Christopher J.	Correspondence with Attorney General regarding notice update.	\$1,010	0.1									

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>				<u>Travel</u>		
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Fees</u>	<u>Falkenberg</u>	<u>Fees</u>	<u>Hrs</u>
		Telephone conference with Attorney Wallace regarding fee application issues.	\$1,010	0.1		\$101.00							
		Correspondence regarding updated research on fee application.	\$1,010	0.3		\$303.00							
		Review CPT email regarding settlement administration.	\$1,010	0.1		\$101.00							
		Respond with Plaintiffs' position regarding open issues.	\$1,010	0.3		\$303.00							
		Correspondence with Sunrise regarding class list information.	\$1,010	0.1		\$101.00							
		Prepare for final approval hearing.	\$1,010	0.2		\$202.00							
		Revise fee application.	\$1,010	1		\$1,010.00							
		Revise fee application.	\$1,010	1.6		\$1,616.00							
		Outline fee options.	\$1,010	0.3		\$303.00							
		Review CPT correspondence regarding class notice and schedule.	\$1,010	0.2		\$202.00							
		Review Attorney Gorman's correspondence regarding class notice.	\$1,010	0.3		\$303.00							
		Prepare correspondence to CPT regarding Plaintiffs' position on updated class notice.	\$1,010	1.2		\$1,212.00							
		Correspondence with CPT regarding class notice.	\$1,010	0.2		\$202.00							
		Review CPT changes to notice.	\$1,010	0.1		\$101.00							
		Review redline changes to class notice.	\$1,010	0.1		\$101.00							
		Office conference regarding class notice.	\$1,010	0.1		\$101.00							
		Prepare correspondence to CPT regarding redline changes to notice.	\$1,010	0.1		\$101.00							
		Telephone conference with Attorney Wallace regarding settlement status and fee application.	\$1,010	0.1		\$101.00							
		Outline case schedule.	\$1,010	0.1		\$101.00							
		Review Attorney Gorman's email regarding class notice update.	\$1,010	0.1		\$101.00							
		Review preliminary approval order regarding notice requirements.	\$1,010	0.1		\$101.00							
		Response to Attorney Gorman regarding class notice update.	\$1,010	0.2		\$202.00							
		Review Settlement Stipulation regarding class notice timing.	\$1,010	0.2		\$202.00							
		Telephone conference with CPT regarding notice timing.	\$1,010	0.2		\$202.00							
		Review Gorman's email regarding class list information.	\$1,010	0.1		\$101.00							
		Telephone conference with Attorney Gorman regarding class list and timing.	\$1,010	0.2		\$202.00							
		Review correspondence from CPT regarding class notice.	\$1,010	0.1		\$101.00							
		Correspondence with Attorney Gorman regarding class notice issues.	\$1,010	0.2		\$202.00							
		Telephone conference with CPT (Irvin) regarding open class notice issues.	\$1,010	0.2		\$202.00							
		Correspondence to Sunrise counsel regarding same.	\$1,010	0.2		\$202.00							
		Draft fee application.	\$1,010	1.6		\$1,616.00							
		Outline inserts regarding fee application.	\$1,010	0.2		\$202.00							
		Follow-up correspondence regarding class notice issues.	\$1,010	0.2		\$202.00							
		Telephone conference with Attorney Umpierre regarding class notice issues.	\$1,010	0.1		\$101.00							
		Review correspondence from Attorney Gorman regarding current residents notice.	\$1,010	0.1		\$101.00							
		Correspondence to Attorney Gorman regarding class notice issues.	\$1,010	0.4		\$404.00							

<u>Fees</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>				<u>General</u>		<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	8/20/2024 Healey, Christopher J.	Follow-up correspondence with Attorney Gorman regarding class notice issues.	\$1,010	0.1		\$101.00									
	8/20/2024 Healey, Christopher J.	Draft fee application.	\$1,010	2.5		\$2,525.00									
	8/20/2024 Healey, Christopher J.	Telephone conference with CPT regarding class notice status.	\$1,010	0.1		\$101.00									
	8/20/2024 Healey, Christopher J.	Office conference regarding fee application and preparation regarding same.	\$1,010	0.1		\$101.00									
	8/21/2024 Healey, Christopher J.	Correspondence regarding class notice.	\$1,010	0.1		\$101.00									
	8/21/2024 Healey, Christopher J.	Draft fee application.	\$1,010	2.5		\$2,525.00									
	8/22/2024 Healey, Christopher J.	Review Oceanside facility issue.	\$1,010	0.1		\$101.00									
	8/22/2024 Healey, Christopher J.	Correspondence with Attorney Gorman regarding Oceanside facility.	\$1,010	0.1		\$101.00									
	8/22/2024 Healey, Christopher J.	Correspondence with CPT regarding same.	\$1,010	0.1		\$101.00									
	8/22/2024 Healey, Christopher J.	Draft fee application.	\$1,010	3.5		\$3,535.00		1	1,010.00						
	8/22/2024 Healey, Christopher J.	Correspondence regarding insert on fee application in prior cases.	\$1,010	0.2		\$202.00									
	8/23/2024 Healey, Christopher J.	Draft fee application.	\$1,010	2.3		\$2,323.00									
	8/23/2024 Healey, Christopher J.	Telephone conference with CPT regarding status fo class notice.	\$1,010	0.2		\$202.00									
	8/23/2024 Healey, Christopher J.	Telephone conference to Julie Green (CPT) regarding class notice issue.	\$1,010	0.1		\$101.00									
	8/23/2024 Healey, Christopher J.	Review correspondence from CPT.	\$1,010	0.1		\$101.00									
	8/23/2024 Healey, Christopher J.	Draft report to Court regarding class notice.	\$1,010	0.4		\$404.00									
	8/23/2024 Healey, Christopher J.	Correspondence with Attorney Gorman regarding same.	\$1,010	0.2		\$202.00									
	8/23/2024 Healey, Christopher J.	Further telephone conference with CPT (Julie Green) regarding class notice.	\$1,010	0.1		\$101.00									
	8/23/2024 Healey, Christopher J.	Follow-up correspondence regarding same.	\$1,010	0.1		\$101.00									
	8/24/2024 Healey, Christopher J.	Draft fee application.	\$1,010	2		\$2,020.00									
	8/25/2024 Healey, Christopher J.	Draft fee application.	\$1,010	1.5		\$1,515.00									
	8/26/2024 Healey, Christopher J.	Correspondence regarding class notice.	\$1,010	0.1		\$101.00									
	8/26/2024 Healey, Christopher J.	Draft fee application.	\$1,010	2		\$2,020.00									
	8/26/2024 Healey, Christopher J.	Outline lodestar deduction categories.	\$1,010	0.3		\$303.00									
	8/27/2024 Healey, Christopher J.	Draft fee application.	\$1,010	3.8		\$3,838.00									
	8/27/2024 Healey, Christopher J.	Correspondence with Attorney Gorman regarding class period.	\$1,010	0.1		\$101.00									
	8/28/2024 Healey, Christopher J.	Draft fee application.	\$1,010	2.5		\$2,525.00									
	8/28/2024 Healey, Christopher J.	Research regarding fee application issues.	\$1,010	1		\$1,010.00									
	8/29/2024 Healey, Christopher J.	Correspondence regarding class notice.	\$1,010	0.1		\$101.00									
	8/29/2024 Healey, Christopher J.	Draft fee application.	\$1,010	2		\$2,020.00									
	8/29/2024 Healey, Christopher J.	Outline supporting Healey declaration.	\$1,010	0.5		\$505.00									
	8/30/2024 Healey, Christopher J.	Draft status report regarding class notice.	\$1,010	0.2		\$202.00									
	8/30/2024 Healey, Christopher J.	Correspondence with Attorney Gorman regarding status report regarding class notice.	\$1,010	0.1		\$101.00									
	8/30/2024 Healey, Christopher J.	Draft fee application.	\$1,010	3.2		\$3,232.00									
	8/31/2024 Healey, Christopher J.	Continue drafting fee application.	\$1,010	3.2		\$3,232.00		3.2	3232						
	8/31/2024 Healey, Christopher J.	Review cases regarding lack of success.	\$1,010	1.2		\$1,212.00									
	8/31/2024 Healey, Christopher J.	Analysis re impact on fee request.	\$1,010	1		\$1,010.00		1	1,010.00						
	9/1/2024 Healey, Christopher J.	Continue drafting fee application.	\$1,010	3.6		\$3,636.00		1	1,010.00						
	9/1/2024 Healey, Christopher J.	Draft supporting Healey declaration.	\$1,010	1		\$1,010.00									
	9/2/2024 Healey, Christopher J.	Revise fee application.	\$1,010	1		\$1,010.00									
	9/2/2024 Healey, Christopher J.	Continue drafting supporting Healey declaration.	\$1,010	1.3		\$1,313.00									
	9/2/2024 Healey, Christopher J.	Prepare correspondence regarding fee research.	\$1,010	0.1		\$101.00									

Fees	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel		
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
	9/2/2024 Healey, Christopher J.	Prepare correspondence to Attorney Wallace regarding fee application.	\$1,010	0.3	\$303.00									
	9/3/2024 Healey, Christopher J.	Correspondence with CPT regarding publication notice.	\$1,010	0.2	\$202.00									
	9/3/2024 Healey, Christopher J.	Correspondence with Attorney Gorman regarding publication notice.	\$1,010	0.2	\$202.00									
	9/3/2024 Healey, Christopher J.	Correspondence with CPT regarding current resident class members.	\$1,010	0.2	\$202.00									
	9/3/2024 Healey, Christopher J.	Telephone conference with Pat Kennedy's office regarding valuation calculations.	\$1,010	0.3	\$303.00									
	9/3/2024 Healey, Christopher J.	Draft Healey declaration in support of final approval/fee application.	\$1,010	3	\$3,030.00									
	9/3/2024 Healey, Christopher J.	Research CA federal case authorities to support three Fee Application issues, for C. Healey.	\$1,010	2	\$2,020.00									
	9/4/2024 Healey, Christopher J.	Prepare correspondence regarding case schedule.	\$1,010	0.1	\$101.00									
	9/4/2024 Healey, Christopher J.	Correspondence with CPT regarding public notice.	\$1,010	0.2	\$202.00									
	9/5/2024 Healey, Christopher J.	Correspondence with Attorney Gorman regarding Injunction Communities census.	\$1,010	0.2	\$202.00									
	9/5/2024 Healey, Christopher J.	Prepare correspondence to team regarding fee application and final approval motion.	\$1,010	0.2	\$202.00									
	9/5/2024 Healey, Christopher J.	Correspondence with team regarding fee application and final approval motion.	\$1,010	0.2	\$202.00									
	9/5/2024 Healey, Christopher J.	Office conference regarding fee application preparation.	\$1,010	0.2	\$202.00									
	9/5/2024 Healey, Christopher J.	Prepare correspondence to Janssen firm regarding supplemental declarations to support final approval motion.	\$1,010	0.5	\$505.00									
	9/6/2024 Healey, Christopher J.	Prepare correspondence to Attorney Gorman regarding injunction facilities.	\$1,010	0.1	\$101.00									
	9/6/2024 Healey, Christopher J.	Review Attorney Marks support for fee application.	\$1,010	0.5	\$505.00									
	9/6/2024 Healey, Christopher J.	Prepare to-do list regarding final approval/fee application.	\$1,010	0.3	\$303.00									
	9/6/2024 Healey, Christopher J.	Correspondence with Attorney Wallace regarding fee application and related issues.	\$1,010	0.3	\$303.00									
	9/7/2024 Healey, Christopher J.	Correspondence with Attorney Gorman regarding current settlement class members issue.	\$1,010	0.2	\$202.00									
	9/7/2024 Healey, Christopher J.	Correspondence with Attorney Wallace regarding fee application.	\$1,010	0.3	\$303.00									
		Total Lodestar		5769.7	\$4,624,412.55									
		Lodestar Reductions				Perct	361.45	\$268,034	74.6	\$64,859	15.8	\$13,792	54.5	\$49,975
						Subt	100%	100%	30.00%	30.00%	100.00%	100.00%	50.00%	50.00%
							361.45	\$268,034	22.38	\$19,458	15.8	\$13,792	27.25	\$24,988
							Hours	Dollars						
						General	361.45	\$268,034						
						CC Confs	22.38	\$19,458						
						Falkenberg	15.8	\$13,792						
						Travel	27.25	\$24,988						
						Less Reduct	426.88	\$326,271						

	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>												
				<u>Worked</u>			General	CC Confs	Falkenberg	Travel	Hrs	Fees	Hrs	Fees					
Fees																			
			Net Lodestar			\$4,298,141.35													

<u>Costs</u>	<u>Category</u>	<u>Amount</u>
	Experts Witness/Consultants	\$306,200.36
	Depositions	\$37,815.75
	Westlaw/Lexis	\$48,230.42
	Mediation Fees	\$25,250.00
	Airfare and Related	\$3,734.60
	Lodging andRelated	\$1,461.13
	Attorney Services	\$641.92
	Court/Filing Fees	\$531.00
	Ground Transportation	\$1,165.87
	Litigation Support Costs	\$18,637.02
	Pacer	\$1,704.40
	Copies	\$6,309.29
	Courier Services	\$946.10
	Publications	\$7,996.70
	Total	\$460,624.56

JANSSEN

Janssen Malloy - Lodestar Fees/Costs

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions				Travel Hrs	Fees
						General		CC Confs	Falkenberg		
						Hrs	Fees	Hrs	Fees		
3/21/2017	W. Timothy Needham	Telephone conference regarding new class case	\$895.00	1.9	\$1,700.50						
6/27/2017	Karen Ellis	E-mails from/to Ms. Knapp	\$275.00	0.2	\$55.00						
6/27/2017	Karen Ellis	Review facility list	\$275.00	0.2	\$55.00						
6/27/2017	Karen Ellis	Telephone conference with Ms. Knapp regarding placing ads	\$275.00	0.2	\$55.00						
6/28/2017	Karen Ellis	Review list of facilities and locations and Search geographical locations to match up with newspapers	\$275.00	2	\$550.00						
6/28/2017	Karen Ellis	Review prior ad placements regarding newspapers	\$275.00	0.7	\$192.50						
6/28/2017	Karen Ellis	Search available newspapers and assign to facilities	\$275.00	0.7	\$192.50						
6/29/2017	Karen Ellis	E-mails to/from to Ms. Stebner and Ms. Knapp regarding newspaper ads	\$275.00	0.4	\$110.00						
6/29/2017	Karen Ellis	Format ad and e-mail to Ms. Stebner and Ms. Knapp for approval	\$275.00	0.8	\$220.00						
6/29/2017	Karen Ellis	Preparation of chart of facilities and newspapers to run ads	\$275.00	1	\$275.00						
6/29/2017	Karen Ellis	Re-format ad and format additional ads	\$275.00	1	\$275.00						
6/30/2017	Karen Ellis	Calls and e-mails to/from newspaper representatives to place ads	\$275.00	3	\$825.00						
6/30/2017	Karen Ellis	Locate phone numbers for various newspapers	\$275.00	0.8	\$220.00						
6/30/2017	Karen Ellis	Preparation of ad recap	\$275.00	1.6	\$440.00						
7/3/2017	Karen Ellis	Arrange for payment of ads	\$275.00	0.8	\$220.00						
7/3/2017	Karen Ellis	E-mails to/from newspaper reps regarding ads	\$275.00	0.3	\$82.50						
7/3/2017	Karen Ellis	Forward ad proof to Ms. Knapp for approval	\$275.00	0.3	\$82.50						
7/3/2017	Karen Ellis	Review and proof ads	\$275.00	1.2	\$330.00						
7/5/2017	Karen Ellis	Arrangement payment for ads	\$275.00	0.4	\$110.00						
7/5/2017	Karen Ellis	E-mails from/to Mr. Barry at Sacramento Bee regarding case number, etc., forward to Ms. Stebner and Ms. Knapp	\$275.00	0.3	\$82.50						
7/5/2017	Karen Ellis	E-mails to/from Ms. Karen at Bay Area News Group regarding credit card issues	\$275.00	0.6	\$165.00						
7/5/2017	Karen Ellis	Proof ads	\$275.00	0.9	\$247.50						
7/6/2017	Karen Ellis	Download pleadings from Ms. Knapp to computer	\$275.00	0.2	\$55.00	0.2	\$	55.00			
7/6/2017	Karen Ellis	E-mail Mr. Dingman at Sacramento Bee regarding case caption	\$275.00	0.2	\$55.00						
7/6/2017	Karen Ellis	Forward Complaint to Ms. Yasukawa	\$275.00	0.2	\$55.00						
7/6/2017	Karen Ellis	Proof and approve ads	\$275.00	0.2	\$55.00						
7/6/2017	Karen Ellis	Respond to ad calls	\$275.00	0.5	\$137.50						
7/6/2017	Karen Ellis	Review Complaint regarding class period, etc.	\$275.00	0.2	\$55.00						
7/6/2017	Karen Ellis	Telephone conference with Ms. Knapp regarding telephone call	\$275.00	0.2	\$55.00						
7/7/2017	Karen Ellis	E-mails from/to Mr. Dingman at Sacramento Bee regarding ad proof	\$275.00	0.2	\$55.00						
7/7/2017	Karen Ellis	E-mails to/from Mr. Healey	\$275.00	0.2	\$55.00						
7/7/2017	Karen Ellis	E-mails to/from Ms. Stebner and Ms. Knapp regarding same	\$275.00	0.2	\$55.00						
7/7/2017	Karen Ellis	Review and approve ad proof	\$275.00	0.2	\$55.00						
7/10/2017	Karen Ellis	E-mail Ms. Stebner and Ms. Knapp regarding status of ads	\$275.00	0.4	\$110.00						
7/10/2017	Karen Ellis	Respond to ad calls	\$275.00	3.5	\$962.50						
7/11/2017	Karen Ellis	Respond to ad calls; format ad recap spreadsheet	\$275.00	0.7	\$192.50						
7/12/2017	Karen Ellis	E-mail Complaint to Ms. Ganz	\$275.00	0.2	\$55.00						
7/12/2017	Karen Ellis	E-mail Complaint to Ms. Johnson	\$275.00	0.2	\$55.00						
7/12/2017	Karen Ellis	E-mail Ms. Stebner and Ms. Knapp regarding status	\$275.00	0.2	\$55.00						
7/12/2017	Karen Ellis	E-mail Ms. Stebner and Ms. Knapp regarding telephone conference with Ms. Ganz	\$275.00	0.2	\$55.00						
7/12/2017	Karen Ellis	E-mail Ms. Stebner and Ms. Knapp regarding telephone conference with Ms. Johnson	\$275.00	0.2	\$55.00						
7/12/2017	Karen Ellis	Respond to ad calls	\$275.00	0.2	\$55.00						
7/13/2017	Karen Ellis	E-mail Ms. Yarnall regarding ads	\$275.00	0.2	\$55.00						
7/13/2017	Karen Ellis	Forward Complaint to Ms. Pietrowski via e-mail	\$275.00	0.2	\$55.00						
7/13/2017	Karen Ellis	Preparation of ad response recap	\$275.00	0.8	\$220.00						
7/13/2017	Karen Ellis	Respond to ad calls	\$275.00	2.4	\$660.00						

Fees

Date	Time Keeper	Task Description	Hourly	Hours	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
			Rate	worked		General Hrs	Fees						
7/14/2017	Karen Ellis	E-mail ad response recap to Ms. Stebner and Ms. Knapp	\$275.00	0.2	\$55.00								
7/14/2017	Karen Ellis	Respond to add calls and e-mail	\$275.00	0.8	\$220.00								
7/14/2017	Karen Ellis	Review and scan e-mail from Ms. Memoles	\$275.00	0.2	\$55.00								
7/17/2017	Megan Yarnall	Review complaint and filings	\$550.00	0.6	\$330.00								
7/18/2017	Megan Yarnall	Respond to ad calls	\$550.00	0.7	\$385.00								
7/19/2017	Megan Yarnall	Conference call	\$550.00	0.5	\$275.00			0.5	\$	275.00			
7/19/2017	Megan Yarnall	Respond to ad calls	\$550.00	1.4	\$770.00								
7/20/2017	Megan Yarnall	Respond to ad calls	\$550.00	1.1	\$605.00								
7/21/2017	Megan Yarnall	Reply to ad calls	\$550.00	2.3	\$1,265.00								
7/25/2017	Karen Ellis	Conference with Ms. Yarnall regarding status	\$275.00	0.2	\$55.00								
7/25/2017	Karen Ellis	E-mails from/to Mr. Dingman at Sacramento Bee regarding digital ads	\$275.00	0.2	\$55.00								
7/25/2017	Megan Yarnall	Ad calls	\$550.00	1.2	\$660.00								
7/26/2017	Karen Ellis	Conference with Ms. Yarnall regarding ad calls	\$275.00	0.2	\$55.00								
7/26/2017	Karen Ellis	Review and respond to ad response calls and e-mails	\$275.00	0.7	\$192.50								
7/26/2017	Megan Yarnall	Ad calls	\$550.00	1.1	\$605.00								
7/27/2017	Karen Ellis	Respond to ad calls	\$275.00	0.8	\$220.00								
7/28/2017	Karen Ellis	Forward to Ms. Stebner and Ms. Knapp	\$275.00	0.2	\$55.00								
7/28/2017	Karen Ellis	Respond to ad calls	\$275.00	0.2	\$55.00								
7/28/2017	Karen Ellis	Review correspondence received from Mr. Wiekamp	\$275.00	0.5	\$137.50								
7/28/2017	Megan Yarnall	Ad calls	\$550.00	1.1	\$605.00								
7/28/2017	Megan Yarnall	Review correspondence and resident survey	\$550.00	0.3	\$165.00								
7/31/2017	Megan Yarnall	Ad calls	\$550.00	0.6	\$330.00								
8/1/2017	Karen Ellis	Respond to ad calls	\$275.00	0.6	\$165.00								
8/1/2017	Karen Ellis	Review notes regarding prior calls	\$275.00	0.2	\$55.00								
8/4/2017	Karen Ellis	E-mail Ms. Knapp regarding potential class rep call	\$275.00	0.2	\$55.00								
8/4/2017	Karen Ellis	E-mails from/to Ms. Knapp regarding status of ad responses	\$275.00	0.2	\$55.00								
8/4/2017	Karen Ellis	Respond to ad calls	\$275.00	2.8	\$770.00								
8/4/2017	Megan Yarnall	Ad call	\$550.00	0.4	\$220.00								
8/7/2017	Megan Yarnall	Ad call	\$550.00	0.5	\$275.00								
8/10/2017	Karen Ellis	Review regarding status of ad calls	\$275.00	0.3	\$82.50								
8/11/2017	Karen Ellis	Telephone conference with Ms. Knapp regarding status of ad calls	\$275.00	0.4	\$110.00								
8/11/2017	Megan Yarnall	Review and reply to correspondence from US Postal Inspector Cissy McCune	\$550.00	0.3	\$165.00								
8/15/2017	Karen Ellis	Conference with Ms. Yarnall regarding telephone call with US Postal Inspector	\$275.00	0.2	\$55.00								
8/15/2017	Megan Yarnall	Ad call	\$550.00	0.6	\$330.00								
8/15/2017	Megan Yarnall	Discuss Ms. McCune with Ms. Ellis	\$550.00	0.2	\$110.00								
8/15/2017	Megan Yarnall	Draft ad call summaries	\$550.00	0.4	\$220.00								
8/15/2017	Megan Yarnall	Email Ms. McCune copy of complaint	\$550.00	0.2	\$110.00								
8/15/2017	Megan Yarnall	Email Ms. Stebner and Ms. Knapp regarding Ms. McCune	\$550.00	0.2	\$110.00								
8/15/2017	Megan Yarnall	Phone conference with US Postal Inspector Cissy McCune regarding: class action litigation	\$550.00	0.4	\$220.00								
8/30/2017	Karen Ellis	Forward e-mail from Ms. LaPatra to Ms. Knapp and Ms. Stebner	\$275.00	0.2	\$55.00								
9/8/2017	Karen Ellis	Respond to ad call	\$275.00	0.7	\$192.50								
9/14/2017	W. Timothy Needham	Telephone conference regarding status	\$895.00	0.3	\$268.50								
9/22/2017	Megan Yarnall	Telephone conference call regarding case status	\$550.00	0.2	\$110.00			0.2	\$	110.00			
12/6/2017	W. Timothy Needham	Review and reply to emails re arbitration	\$895.00	0.3	\$268.50								
12/6/2017	W. Timothy Needham	Review arbitration agreement	\$895.00	0.3	\$268.50								
12/6/2017	W. Timothy Needham	Review documents re arbitration	\$895.00	0.3	\$268.50								
12/13/2017	W. Timothy Needham	Attend telephone conference	\$895.00	0.7	\$626.50								
1/5/2018	Karen Ellis	Respond to ad call, not a resident during class period	\$275.00	0.4	\$110.00								
1/18/2018	W. Timothy Needham	Attend telephone conference regarding Motion to Dismiss	\$895.00	0.3	\$268.50								
2/6/2018	W. Timothy Needham	Draft to-do memo	\$895.00	0.2	\$179.00								
2/6/2018	W. Timothy Needham	Review Motion to Compel Arbitration, Dismiss	\$895.00	1.7	\$1,521.50								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions				Travel Hrs	Fees
						General Hrs	Fees	CC Confs Hrs	Fees		
2/7/2018	W. Timothy Needham	Attend telephone conference	\$895.00	0.5	\$447.50						
2/15/2018	W. Timothy Needham	Telephone conference regarding assignments	\$895.00	0.4	\$358.00						
2/19/2018	W. Timothy Needham	Prepare amendments	\$895.00	0.3	\$268.50						
2/19/2018	W. Timothy Needham	Review emails and documents	\$895.00	0.2	\$179.00						
2/22/2018	W. Timothy Needham	Telephone conference with team regarding next steps	\$895.00	0.3	\$268.50			0.3	\$	268.50	
3/1/2018	Megan Yarnall	Telephone conference with co counsel regarding case status	\$550.00	0.2	\$110.00			0.2	\$	110.00	
3/15/2018	W. Timothy Needham	Attend phone conference	\$895.00	0.4	\$358.00						
4/19/2018	Megan Yarnall	Phone conference with co-counsel regarding case status	\$550.00	0.3	\$165.00			0.3	\$	165.00	
4/19/2018	W. Timothy Needham	Telephone conference regarding to-do list	\$895.00	0.4	\$358.00			0.4	\$	358.00	
4/26/2018	Megan Yarnall	Phone conference with co-counsel to discuss case status	\$550.00	0.3	\$165.00			0.3	\$	165.00	
4/26/2018	W. Timothy Needham	Attend phone conference	\$895.00	0.3	\$268.50			0.3	\$	268.50	
5/24/2018	Megan Yarnall	Review correspondence regarding case status from co-counsel	\$550.00	0.2	\$110.00						
6/1/2018	Megan Yarnall	Phone conference with co-counsel	\$550.00	0.3	\$165.00			0.3	\$	165.00	
7/5/2018	Megan Yarnall	Review correspondence and attached documents	\$550.00	0.4	\$220.00						
7/9/2018	W. Timothy Needham	Review status report	\$895.00	0.2	\$179.00						
7/19/2018	Karen Ellis	Attend Class Case conference call	\$275.00	0.2	\$55.00			0.2	\$	55.00	
7/20/2018	Karen Ellis	Email to Ms Yarnall	\$275.00	0.1	\$27.50						
7/20/2018	Karen Ellis	Type up notes regarding weekly nursing home conference call	\$275.00	0.1	\$27.50						
12/6/2018	W. Timothy Needham	Email Chris and Sarah and reply to email re arbitration	\$895.00	0.2	\$179.00						
12/6/2018	W. Timothy Needham	Review recent arbitration cases	\$895.00	2.7	\$2,416.50						
12/11/2018	W. Timothy Needham	Review multiple cases on arbitration	\$895.00	4.9	\$4,385.50						
12/12/2018	W. Timothy Needham	Continue review of arbitration cases	\$895.00	3.5	\$3,132.50						
12/12/2018	W. Timothy Needham	Work on memo to Attorney Healy	\$895.00	0.4	\$358.00						
12/13/2018	W. Timothy Needham	Finish memo and sent final to Chris Healy	\$895.00	1.9	\$1,700.50						
1/23/2019	W. Timothy Needham	Review Colby memo	\$895.00	0.6	\$537.00						
1/23/2019	W. Timothy Needham	Review multiple emails	\$895.00	0.2	\$179.00						
1/25/2019	W. Timothy Needham	Begin research on Sunrise	\$895.00	1.7	\$1,521.50						
1/25/2019	W. Timothy Needham	Review email from Chris	\$895.00	0.2	\$179.00						
1/28/2019	W. Timothy Needham	Email Chris re Welltower, Riviera and Sunrise	\$895.00	0.3	\$268.50						
1/28/2019	W. Timothy Needham	Research connection between Welltower, Riviera and Sunrise	\$895.00	3	\$2,685.00						
1/28/2019	W. Timothy Needham	Review 10k's of Welltower	\$895.00	0.6	\$537.00						
1/29/2019	W. Timothy Needham	Review and respond to emails	\$895.00	0.2	\$179.00						
1/29/2019	W. Timothy Needham	Telephone call to Canadian Firm regarding class case	\$895.00	0.5	\$447.50						
1/30/2019	W. Timothy Needham	Email Chris re Oakley	\$895.00	0.3	\$268.50						
1/30/2019	W. Timothy Needham	Receive call from Attorney Oakley	\$895.00	0.3	\$268.50						
1/30/2019	W. Timothy Needham	Review and research re Oakley	\$895.00	2.3	\$2,058.50						
2/7/2019	W. Timothy Needham	Attend conference call	\$895.00	0.4	\$358.00			0.4	\$	358.00	
2/21/2019	Karen Ellis	Conference with Mr. Needham regarding summarizing DSS records	\$275.00	0.2	\$55.00						
2/21/2019	W. Timothy Needham	Attend Telephone conference	\$895.00	0.3	\$268.50			0.3	\$	268.50	
2/22/2019	Karen Ellis	Conference with Mr. Needham re dss records	\$275.00	0.2	\$55.00						
2/22/2019	Karen Ellis	Review e-mail from Chris Healey and Lucy Valdez regarding document summaries	\$275.00	0.2	\$55.00						
2/25/2019	Megan Yarnall	Discuss case status with Mr. Needham	\$550.00	0.2	\$110.00						
2/26/2019	Karen Ellis	Conference with Ms. Yarnall regarding DSS	\$275.00	0.2	\$55.00						
2/26/2019	Karen Ellis	Review sample facility DSS documents and	\$275.00	0.2	\$55.00						
2/26/2019	Megan Yarnall	Discuss DSS records with Ms. Ellis	\$550.00	0.2	\$110.00						
2/26/2019	Megan Yarnall	Review and summarize DSS records	\$550.00	2.9	\$1,595.00						
2/26/2019	Megan Yarnall	Review correspondence regarding DSS records	\$550.00	0.2	\$110.00						
2/27/2019	Megan Yarnall	Review and summarize DSS records	\$550.00	5	\$2,750.00						
2/28/2019	Karen Ellis	Conference with Ms. Yarnall regarding ALF deficiencies language	\$275.00	0.2	\$55.00						
2/28/2019	Karen Ellis	Search DSS website regarding ALF deficiencies language	\$275.00	0.2	\$55.00						
2/28/2019	Megan Yarnall	Discuss DSS records with Ms. Ellis and Mr. Needham	\$550.00	0.2	\$110.00						
2/28/2019	Megan Yarnall	Review and summarize DSS records	\$550.00	4.9	\$2,695.00						
3/1/2019	Megan Yarnall	Discuss DSS records with Ms. Ellis and Mr. Needham and Mr. Healey	\$550.00	0.2	\$110.00						

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
3/1/2019	Megan Yarnall	Review and summarize DSS records	\$550.00	0.8	\$440.00								
3/1/2019	W. Timothy Needham	Review multiple emails	\$895.00	0.3	\$268.50								
3/4/2019	Megan Yarnall	Draft portion of amended complaint	\$550.00	1	\$550.00								
3/4/2019	Megan Yarnall	Review and summarize DSS records	\$550.00	3.1	\$1,705.00								
3/4/2019	Megan Yarnall	Review court's ruling regarding motion to dismiss	\$550.00	0.2	\$110.00								
3/5/2019	Megan Yarnall	Discuss DSS records with Mr. Needham and Michael Thamer	\$550.00	0.3	\$165.00								
3/5/2019	Megan Yarnall	Review and summarize DSS records	\$550.00	5	\$2,750.00								
3/6/2019	Megan Yarnall	Review and summarize DSS records	\$550.00	3.7	\$2,035.00								
3/7/2019	Karen Ellis	Locate and forward list of facilities to Ms. Yarnall	\$275.00	0.2	\$55.00								
3/7/2019	Megan Yarnall	Phone conference with co-counsel regarding case status	\$550.00	0.3	\$165.00			0.3	\$		165.00		
3/7/2019	Megan Yarnall	Review and summarize DSS records	\$550.00	5.2	\$2,860.00								
3/7/2019	W. Timothy Needham	Attend telephone conference regarding getting final	\$895.00	0.4	\$358.00								
3/8/2019	Megan Yarnall	Email Mr. Healey regarding DSS records	\$550.00	0.2	\$110.00								
3/8/2019	Megan Yarnall	Summarize, review, revise DSS records	\$550.00	4.6	\$2,530.00								
3/11/2019	Megan Yarnall	Review DSS data for Sunrise facilities	\$550.00	0.4	\$220.00								
3/12/2019	Megan Yarnall	Review DSS data	\$550.00	2.2	\$1,210.00								
3/14/2019	Megan Yarnall	Read court order regarding motion to dismiss	\$550.00	0.2	\$110.00								
3/14/2019	Megan Yarnall	Telephone conference with co counsel	\$550.00	0.2	\$110.00			0.2	\$		110.00		
3/14/2019	W. Timothy Needham	Attend weekly telephone conference regarding status	\$895.00	0.3	\$268.50			0.3	\$		268.50		
3/20/2019	Megan Yarnall	Review DSS records	\$550.00	3	\$1,650.00								
3/26/2019	Megan Yarnall	Discuss with Mr. Needham	\$550.00	0.1	\$55.00								
		Review and reply to correspondence regarding amending complaint to add											
3/26/2019	Megan Yarnall	Sunrise Management as defendant	\$550.00	0.1	\$55.00								
3/27/2019	W. Timothy Needham	Research corporate structure	\$895.00	2.9	\$2,595.50								
3/28/2019	Karen Ellis	Conference with Mr. Needham re licensee information	\$275.00	0.2	\$55.00								
3/28/2019	Karen Ellis	Locate licensee information for Sunrise facilities	\$275.00	1	\$275.00								
3/28/2019	Megan Yarnall	Discuss with Mr. Needham	\$550.00	0.1	\$55.00								
3/28/2019	Megan Yarnall	Review correspondence regarding adding corporate defendants	\$550.00	0.1	\$55.00								
3/28/2019	W. Timothy Needham	Meet with Mr. Stein	\$895.00	0.02	\$17.90								
3/28/2019	W. Timothy Needham	Review additional West Law correspondence re: relation back	\$895.00	1.1	\$984.50								
3/28/2019	W. Timothy Needham	Review and respond to email re relation back	\$895.00	0.2	\$179.00								
3/28/2019	William Stein	Relation back memorandum	\$550.00	1.1	\$605.00			1.1	\$		605.00		
		Research on relation back/discussion with Tim on corporate ownership											
3/28/2019	William Stein	project	\$550.00	2.2	\$1,210.00			2.2	\$		1,210.00		
3/29/2019	Karen Ellis	Complete locating licensee information for Sunrise facilities	\$275.00	0.8	\$220.00								
3/29/2019	Karen Ellis	Preparation of chart for Mr. Needham	\$275.00	0.5	\$137.50								
3/29/2019	William Stein	Relation back memo	\$550.00	1.1	\$605.00			1.1	\$		605.00		
3/29/2019	William Stein	Research on corporate form	\$550.00	2.3	\$1,265.00			2.3	\$		1,265.00		
3/29/2019	William Stein	Research on corporate form of Welltower/Revera/Sunrise	\$550.00	2.6	\$1,430.00			2.6	\$		1,430.00		
4/1/2019	Karen Ellis	Conference with Mr. Stein regarding corporate information	\$275.00	0.2	\$55.00								
4/1/2019	William Stein	Review of sec filings for ownership of SSL and SSLMI	\$550.00	2.1	\$1,155.00			2.1	\$		1,155.00		
4/1/2019	William Stein	Review of sec filings for ownership of SSL and SSLMI	\$550.00	3.3	\$1,815.00			3.3	\$		1,815.00		
4/2/2019	William Stein	Agency/direct liability memo	\$550.00	1.5	\$825.00			1.5	\$		825.00		
4/2/2019	William Stein	Corporate ownership memo	\$550.00	3.1	\$1,705.00			3.1	\$		1,705.00		
4/2/2019	William Stein	Research on direct liability through corporate agency	\$550.00	0.4	\$220.00			0.4	\$		220.00		
4/3/2019	W. Timothy Needham	Work on serving on organization	\$895.00	1.9	\$1,700.50								
4/3/2019	William Stein	Creation of corporate charts, memo on agency liability of sunrise	\$550.00	2.1	\$1,155.00			2.1	\$		1,155.00		
4/3/2019	William Stein	Memo on agency liability of LLC and management	\$550.00	1.6	\$880.00			1.6	\$		880.00		
4/4/2019	Megan Yarnall	Discuss with Mr. Needham re corporate structure	\$550.00	0.5	\$275.00								
4/4/2019	Megan Yarnall	Review trademark fillings at USPTO regarding corporate structure	\$550.00	0.4	\$220.00								
4/4/2019	Megan Yarnall	Telephone conference with co-counsel regarding case status	\$550.00	0.2	\$110.00								
4/4/2019	W. Timothy Needham	Email to Chris re relation back	\$895.00	0.2	\$179.00								
4/4/2019	W. Timothy Needham	Review Willie's memos and redraft re relation back	\$895.00	0.8	\$716.00								
4/4/2019	W. Timothy Needham	Telephone conference with regarding going forward	\$895.00	0.4	\$358.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions				Travel Hrs	Fees
						General Hrs	Fees	CC Confs Hrs	Fees		
4/4/2019	William Stein	Edits to memos on relation back and corporate ownership of Sunrise	\$550.00	0.5	\$275.00						
4/5/2019	William Stein	Edits to corporate structure diagrams	\$550.00	0.3	\$165.00		0.3 \$		165.00		
4/8/2019	Megan Yarnall	Discuss with Ms. Ellis	\$550.00	0.1	\$55.00						
4/8/2019	Megan Yarnall	Email Ms. Ellis list of facilities	\$550.00	0.1	\$55.00						
4/10/2019	W. Timothy Needham	Respond to Chris Healey's email re corp structure	\$895.00	0.2	\$179.00						
4/10/2019	W. Timothy Needham	Review multiple websites re corporate structure investigation	\$895.00	1.9	\$1,700.50						
4/11/2019	W. Timothy Needham	Research Lexis cases regarding Sunrise LLC	\$895.00	2	\$1,790.00						
4/12/2019	W. Timothy Needham	Redraft memo re corp structure	\$895.00	1.6	\$1,432.00						
4/12/2019	W. Timothy Needham	Telephone call to Attorney for plaintiff of other sunrise case	\$895.00	0.3	\$268.50						
4/12/2019	William Stein	Incorporate defendant's disclosure into corporate ownership memo and chart	\$550.00	0.5	\$275.00		0.5 \$		275.00		
4/15/2019	Megan Yarnall	Review CCL citation update emails from DSS	\$550.00	0.5	\$275.00						
4/15/2019	W. Timothy Needham	Continue research on Sunrise organization	\$895.00	2.6	\$2,327.00						
4/15/2019	W. Timothy Needham	Meet with Willie	\$895.00	0.3	\$268.50						
4/15/2019	William Stein	Research on SSL public facing representations about LLC/INC	\$550.00	3.4	\$1,870.00		3.4 \$		1,870.00		
4/16/2019	W. Timothy Needham	Email Chris and Sarah re corporate structure	\$895.00	0.6	\$537.00						
4/16/2019	W. Timothy Needham	Review email on corporate	\$895.00	0.2	\$179.00						
4/18/2019	Megan Yarnall	Conference call with co-counsel regarding case status	\$550.00	0.3	\$165.00			0.3 \$	165.00		
4/18/2019	W. Timothy Needham	Attend telephone conference regarding Sunrise to do list	\$895.00	0.3	\$268.50			0.3 \$	268.50		
5/14/2019	W. Timothy Needham	Research issue and distinctiveness for Rico	\$895.00	1.9	\$1,700.50						
5/15/2019	W. Timothy Needham	Draft memo to Chris re pilcro	\$895.00	0.6	\$537.00						
5/15/2019	W. Timothy Needham	Research computer distinctiveness for Pilco purposes	\$895.00	2.3	\$2,058.50						
5/23/2019	William Stein	Review of Healthcare Partnership INC, SEC filing	\$550.00	1	\$550.00		1 \$		550.00		
5/24/2019	Karen Ellis	E-mails from/to Brian Umpierre regarding Sunrise ads	\$275.00	0.2	\$55.00						
5/24/2019	Karen Ellis	Locate ad recap and ad responses and forward to Mr. Umpierre	\$275.00	0.2	\$55.00						
5/24/2019	Megan Yarnall	Phone conference with co counsel regarding case status	\$550.00	0.4	\$220.00			0.4 \$	220.00		
5/24/2019	W. Timothy Needham	Attend phone conference regarding going forward	\$895.00	0.4	\$358.00			0.4 \$	358.00		
5/24/2019	William Stein	Review of HCP SEC filing, background on Ridea Structuring	\$550.00	1.2	\$660.00		1.2 \$		660.00		
5/28/2019	William Stein	Research on HCP no pass-through provisions in Master lease	\$550.00	2.1	\$1,155.00		2.1 \$		1,155.00		
5/29/2019	Karen Ellis	E-mails from/to Brian Umpierre regarding sample ad	\$275.00	0.2	\$55.00						
6/4/2019	Megan Yarnall	Review correspondence regarding discovery	\$550.00	0.3	\$165.00						
6/7/2019	Megan Yarnall	Telephone conference with co counsel regarding case status	\$550.00	0.2	\$110.00			0.2 \$	110.00		
6/10/2019	Megan Yarnall	Email Ms. Colby regarding citations at Sunrise facilities	\$550.00	0.3	\$165.00						
6/10/2019	Megan Yarnall	Review pleadings in separate employment class action matter	\$550.00	2.2	\$1,210.00						
6/13/2019	Megan Yarnall	Review correspondence regarding Shieferaw case	\$550.00	0.2	\$110.00						
6/14/2019	Megan Yarnall	Telephone conference with Co-Counsel	\$550.00	0.2	\$110.00			0.2 \$	110.00		
6/20/2019	Megan Yarnall	Review correspondence	\$550.00	0.2	\$110.00						
7/17/2019	Megan Yarnall	Review correspondence	\$550.00	0.2	\$110.00						
7/25/2019	Megan Yarnall	Conference call with co-counsel	\$550.00	0.2	\$110.00			0.2 \$	110.00		
7/26/2019	Megan Yarnall	Review correspondence and discovery documents	\$550.00	0.2	\$110.00						
8/15/2019	Megan Yarnall	Conference call with co-counsel	\$550.00	0.2	\$110.00			0.2 \$	110.00		
10/4/2019	Megan Yarnall	Conference call with co counsel	\$550.00	0.2	\$110.00			0.2 \$	110.00		
10/28/2019	Megan Yarnall	Telephone conference with co-counsel regarding case status	\$550.00	0.2	\$110.00			0.2 \$	110.00		
11/7/2019	Megan Yarnall	Conference with co-counsel	\$550.00	0.2	\$110.00			0.2 \$	110.00		
11/15/2019	Megan Yarnall	Phone conference with co-counsel re case status	\$550.00	0.3	\$165.00			0.3 \$	165.00		
11/22/2019	Megan Yarnall	Conference call with co-counsel regarding case status	\$550.00	0.2	\$110.00			0.2 \$	110.00		
12/3/2019	Karen Ellis	Conference with MAY regarding Belaire notice	\$275.00	0.2	\$55.00						
12/3/2019	Karen Ellis	Phone call with John Kozub regarding Belaire notice	\$275.00	0.4	\$110.00						
12/3/2019	Megan Yarnall	Conference call with co-counsel regarding: case status	\$550.00	0.2	\$110.00			0.2 \$	110.00		
12/4/2019	Karen Ellis	Review e-mails regarding contacts regarding Belaire notice and request for copy of notice	\$275.00	0.3	\$82.50						
12/4/2019	Megan Yarnall	Email Mr. Healey regarding: Belaire West Notice	\$550.00	0.2	\$110.00						
12/4/2019	Megan Yarnall	Review notice and discuss with Ms. Ellis	\$550.00	0.2	\$110.00						
12/6/2019	Megan Yarnall	Review correspondence	\$550.00	0.2	\$110.00						

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
12/9/2019	Karen Ellis	Phone call with John Kozub	\$275.00	1.1	\$302.50								
12/9/2019	Karen Ellis	E-mail from Ms. Yarnall regarding additional contact	\$275.00	0.3	\$82.50								
12/9/2019	Karen Ellis	E-mails from/to Julie Erickson regarding additional contacts	\$275.00	0.4	\$110.00								
12/9/2019	Megan Yarnall	Review correspondence from class members, discuss with Ms. Ellis	\$550.00	0.2	\$110.00								
12/10/2019	Karen Ellis	Conference with Ms. Yarnall regarding status of contacts	\$275.00	0.2	\$55.00								
12/10/2019	Karen Ellis	E-mail contacts without phone numbers	\$275.00	0.9	\$247.50								
12/10/2019	Karen Ellis	Left messages for additional contacts	\$275.00	0.4	\$110.00								
12/10/2019	Karen Ellis	Phone call with Cathy Ziehl, Mx. LB, and Mx. LR	\$275.00	1.4	\$385.00								
12/10/2019	Karen Ellis	Review e-mails regarding additional contacts	\$275.00	1	\$275.00								
12/10/2019	Megan Yarnall	Phone call with co-counsel regarding : discovery issues and upcoming depositions	\$550.00	0.4	\$220.00								
12/10/2019	Megan Yarnall	Review correspondence, review SEC filings of owner welltower	\$550.00	1.9	\$1,045.00								
12/11/2019	Karen Ellis	E-mails from/to contacts	\$275.00	0.3	\$82.50								
12/11/2019	Karen Ellis	Phone call with Donna LaBelle	\$275.00	1	\$275.00								
12/11/2019	Karen Ellis	Return calls to additional contacts	\$275.00	0.6	\$165.00								
12/11/2019	Karen Ellis	Review e-mails regarding additional contact	\$275.00	0.2	\$55.00								
12/11/2019	Megan Yarnall	Review correspondence from potential class members and discuss same with Ms. Ellis	\$550.00	0.3	\$165.00								
12/11/2019	Megan Yarnall	Review correspondence regarding: discovery plan	\$550.00	0.2	\$110.00								
12/12/2019	Karen Ellis	Conference with Ms. Yarnall regarding same	\$275.00	0.2	\$55.00								
12/12/2019	Karen Ellis	Phone call with Gail Melon (2)	\$275.00	1.4	\$385.00								
12/12/2019	Megan Yarnall	Discuss class member calls with Ms. Ellis	\$550.00	0.2	\$110.00								
12/12/2019	Megan Yarnall	Discuss Welltower SEC filings with Mr. Needham and Email Mr. Needham regarding: same	\$550.00	0.2	\$110.00								
12/13/2019	Karen Ellis	Attempt to contact other contacts	\$275.00	0.5	\$137.50								
12/13/2019	Karen Ellis	E-mails to/from contacts	\$275.00	0.6	\$165.00								
12/13/2019	Karen Ellis	Phone call with Mx. AB	\$275.00	1.3	\$357.50								
12/13/2019	Karen Ellis	Phone call with Gail Melom	\$275.00	1	\$275.00								
12/17/2019	Karen Ellis	E-mails from/to Kathy Hartoch	\$275.00	0.4	\$110.00								
12/17/2019	Karen Ellis	Review regarding status of calls	\$275.00	0.2	\$55.00								
12/18/2019	Karen Ellis	E-mail George Kawamoto and Brian Umpierre regarding potential individual claim	\$275.00	0.2	\$55.00								
12/18/2019	Karen Ellis	E-mails from/to Julie Erickson regarding status of contacting Gail Melom	\$275.00	0.4	\$110.00								
12/18/2019	Karen Ellis	Phone call with Mx. DE	\$275.00	1	\$275.00								
12/18/2019	Karen Ellis	Phone call with Kathy Hartoch	\$275.00	0.8	\$220.00								
12/18/2019	Megan Yarnall	Review correspondence, discuss with Ms. Ellis	\$550.00	0.2	\$110.00								
12/23/2019	Megan Yarnall	Research regarding: Sunrise SEC filings and any information regarding Welltower REIT	\$550.00	2.4	\$1,320.00								
12/24/2019	Megan Yarnall	Research regarding management agreement with Welltower	\$550.00	1	\$550.00								
12/26/2019	Karen Ellis	Review fax from Ms. Melom	\$275.00	0.2	\$55.00								
12/30/2019	Megan Yarnall	Email Ms. Ellis regarding: contacts with class reps and potential witnesses	\$550.00	0.2	\$110.00								
12/30/2019	W. Timothy Needham	E-mail Healey re welltower	\$895.00	0.3	\$268.50								
12/30/2019	W. Timothy Needham	Review federal filings regarding Welltower	\$895.00	0.9	\$805.50								
12/31/2019	Karen Ellis	Review contact notes regarding Ms. Yarnall inquiry regarding San Mateo and San Rafael facilities and e-mail Michael Thamer regarding same	\$275.00	0.7	\$192.50								
1/2/2020	Karen Ellis	Attempt to contact Mx. AH by phone and e-mail	\$275.00	0.2	\$55.00								
1/2/2020	Karen Ellis	E-mail Michael Thamer regarding Mx. AH contact	\$275.00	0.2	\$55.00								
1/2/2020	Karen Ellis	E-mails from/to Ms. Yarnall regarding san mateo and San Rafael facilities	\$275.00	0.4	\$110.00								
1/2/2020	Karen Ellis	Prepare list of contacts to date regarding title guarantee	\$275.00	0.4	\$110.00								
1/2/2020	Karen Ellis	Review contact notes regarding San Mateo and San Rafael facilities	\$275.00	0.8	\$220.00								
1/2/2020	Karen Ellis	Review documents from Gail Melom	\$275.00	0.4	\$110.00								
1/2/2020	Megan Yarnall	Review CCL records for information regarding: management agreements	\$550.00	3.1	\$1,705.00								
1/3/2020	Karen Ellis	E-mail Ms. Yarnall and Mr. Thamer regarding San Mateo contact	\$275.00	0.4	\$110.00								

Fees

Date	Time Keeper	Task Description	Hourly	Hours	Fee (Rate x Hours)	Lodestar Reductions		CC Confs	Fees	Falkenberg	Fees	Travel	Fees
			Rate	worked		General	Hrs						
1/3/2020	Karen Ellis	E-mails from/to Mx. AH	\$275.00	0.3	\$82.50								
1/3/2020	Karen Ellis	Review e-mails from contacts	\$275.00	0.4	\$110.00								
1/3/2020	Karen Ellis	ShareFile Master Lease to Chris Healey	\$275.00	0.3	\$82.50								
1/3/2020	Megan Yarnall	Discuss CCL and management agreements with Mr. Needham	\$550.00	0.2	\$110.00								
1/3/2020	Megan Yarnall	Email Mr. Healey regarding: CCL and management agreements	\$550.00	0.2	\$110.00								
1/3/2020	Megan Yarnall	Review CCL Documents and management agreements	\$550.00	1.8	\$990.00								
1/7/2020	Karen Ellis	Conference with Ms. Yarnall regarding Mx. AH	\$275.00	0.2	\$55.00								
1/7/2020	Karen Ellis	Phone call with Mx. AH	\$275.00	0.7	\$192.50								
1/7/2020	Karen Ellis	Review e-mail from Mx. AH	\$275.00	0.3	\$82.50								
1/8/2020	Karen Ellis	Briefly review documents from Kathy Hartoch	\$275.00	0.2	\$55.00								
1/9/2020	Karen Ellis	Review email from Mx. AH regarding documents	\$275.00	0.2	\$55.00								
1/10/2020	Karen Ellis	E-mails from/to Julie Erickson regarding additional contacts	\$275.00	0.2	\$55.00								
1/10/2020	Karen Ellis	E-mails from/to Kathy Hartoch regarding documents	\$275.00	0.2	\$55.00								
1/10/2020	Karen Ellis	Phone call and Emails from/to Mx. AH regarding documents	\$275.00	0.4	\$110.00								
1/15/2020	Karen Ellis	Conference with Ms. Yarnall regarding contacts	\$275.00	0.2	\$55.00								
1/15/2020	Karen Ellis	Prepare recap of contacts	\$275.00	1.1	\$302.50								
1/15/2020	Megan Yarnall	Discuss status of calls with class members with Ms. Ellis	\$550.00	0.2	\$110.00								
1/15/2020	Megan Yarnall	Email Mr. Healey regarding: status of calls from class members and upcoming email to class members	\$550.00	0.3	\$165.00								
1/16/2020	Megan Yarnall	Review DSS CCL records and correspondence	\$550.00	1.5	\$825.00								
1/20/2020	Karen Ellis	Emails from/to Gail Melon regarding phone conference to discuss matter	\$275.00	0.2	\$55.00								
1/20/2020	Karen Ellis	Review emails provided by Ms. Melon regarding charges & care	\$275.00	1.1	\$302.50								
1/20/2020	Karen Ellis	Review regarding other contacts and documents	\$275.00	1.5	\$412.50								
1/21/2020	Karen Ellis	Conference with Ms. Yarnall regarding global emails and forward sample email	\$275.00	0.2	\$55.00								
1/21/2020	Karen Ellis	Email to Kathy Hartoch regarding phone conference and status	\$275.00	0.8	\$220.00								
1/21/2020	Karen Ellis	Emails from/to Mx. AH regarding phone conference and status	\$275.00	0.7	\$192.50								
1/21/2020	Karen Ellis	Phone call with Gail Melon	\$275.00	1.1	\$302.50								
1/21/2020	Megan Yarnall	Discuss batch email to class members with Ms. Ellis	\$550.00	0.2	\$110.00								
1/22/2020	Karen Ellis	Conference with Ms. Yarnall regarding class member calls	\$275.00	0.2	\$55.00								
1/22/2020	Karen Ellis	Emails to/from Ms. Ziehl regarding scheduling phone conference	\$275.00	0.3	\$82.50								
1/22/2020	Karen Ellis	Phone call with Mx. CE regarding whether or not she is interested in signing declaration (she decided not at this time because mother a current resident)	\$275.00	0.5	\$137.50								
1/22/2020	Karen Ellis	Phone call with Mx. LR regarding whether or not she is able to sign declaration (she is checking with her father to see if he is interested)	\$275.00	0.6	\$165.00								
1/22/2020	Karen Ellis	Phone call with Ms. Hartoch to obtain information for declaration	\$275.00	0.5	\$137.50								
1/22/2020	Karen Ellis	Phone call with Mx. AH to schedule time to discuss information for declaration	\$275.00	0.4	\$110.00								
1/22/2020	Karen Ellis	Review spreadsheet of resident contact information	\$275.00	0.6	\$165.00								
1/22/2020	Karen Ellis	Scan and review documents received from Cathy Ziehl	\$275.00	0.3	\$82.50								
1/22/2020	Karen Ellis	Scan and review documents received from Mx. AH	\$275.00	0.3	\$82.50								
1/22/2020	Karen Ellis	Scan and review documents received from Kathy Hartoch	\$275.00	0.2	\$55.00								
1/22/2020	Megan Yarnall	Discuss class member calls with Ms. Ellis	\$550.00	0.2	\$110.00								
1/23/2020	Karen Ellis	Attempt to contact Melinda Redding and Carol Loffredi	\$275.00	0.5	\$137.50								
1/23/2020	Karen Ellis	Conference with Ms. Yarnall regarding emailing residents	\$275.00	0.6	\$165.00								
1/23/2020	Karen Ellis	Email from Cathy Ziehl regarding phone conference on Friday	\$275.00	0.2	\$55.00								
1/23/2020	Karen Ellis	Email Stebner & Associates regarding Mx. AH	\$275.00	0.6	\$165.00								
1/23/2020	Karen Ellis	Emails from/to Mx. AH	\$275.00	0.5	\$137.50								
1/23/2020	Megan Yarnall	Call MS. Erickson regarding: class list for contacting	\$550.00	0.3	\$165.00								
1/23/2020	Megan Yarnall	Discuss class list with Ms. Ellis	\$550.00	0.6	\$330.00								
1/23/2020	Megan Yarnall	Edit and prepare class member list for contacting	\$550.00	1.7	\$935.00								
1/23/2020	Megan Yarnall	Conference with Ms. Yarnall regarding splitting contacts regarding facilities geographically	\$550.00	1.7	\$935.00								
1/24/2020	Karen Ellis	Conference with Ms. Yarnall regarding splitting contacts regarding facilities geographically	\$275.00	0.6	\$165.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
1/24/2020	Karen Ellis	Prepare for phone conference with Mx. AH and phone call with Mx. AH	\$275.00	0.4	\$110.00								
1/24/2020	Karen Ellis	Prepare for phone conference with Cathy Ziehl and phone call with Ms. Ziehl	\$275.00	0.4	\$110.00								
1/24/2020	Karen Ellis	Update status recap	\$275.00	1.8	\$495.00								
1/24/2020	Megan Yarnall	Discuss with Ms. Ellis re class outreach	\$550.00	0.6	\$330.00								
1/24/2020	Megan Yarnall	Edit contact list to prepare for paper mailing	\$550.00	1.5	\$825.00								
1/24/2020	Megan Yarnall	Email Mr. Needham regarding class outreach	\$550.00	0.2	\$110.00								
1/24/2020	Megan Yarnall	Email Ms. Erickson regarding: emailing class members	\$550.00	0.2	\$110.00								
1/27/2020	Karen Ellis	Respond to calls regarding emails sent	\$275.00	1.7	\$467.50								
1/27/2020	Karen Ellis	Review, respond to and organize emails received from potential class members	\$275.00	1.7	\$467.50								
1/27/2020	Karen Ellis	Work with Ms. Yarnall on mass email to potential class members	\$275.00	0.7	\$192.50								
1/27/2020	Megan Yarnall	Discuss responses and how to handle calls with Ms. Ellis	\$550.00	0.4	\$220.00								
1/27/2020	Megan Yarnall	Discuss with Ms. Ellis	\$550.00	0.3	\$165.00								
1/27/2020	Megan Yarnall	Draft and revise email to class members	\$550.00	0.8	\$440.00								
1/27/2020	Megan Yarnall	Email class members	\$550.00	0.8	\$440.00								
1/27/2020	Megan Yarnall	Email Ms. Erickson regarding: same	\$550.00	0.2	\$110.00								
1/27/2020	Megan Yarnall	Review and revise class member contact list	\$550.00	2	\$1,100.00								
1/27/2020	Megan Yarnall	Review correspondence	\$550.00	0.2	\$110.00								
1/28/2020	Karen Ellis	Respond to calls in response to emails	\$275.00	4.2	\$1,155.00								
1/28/2020	Karen Ellis	Review emails regarding additional contacts from Belaire notice	\$275.00	0.9	\$247.50								
1/28/2020	Karen Ellis	Review, respond to and organize emails received from potential class members	\$275.00	2.1	\$577.50								
1/28/2020	Megan Yarnall	Discuss class contacts with Ms. Ellis	\$550.00	0.3	\$165.00								
1/28/2020	Megan Yarnall	Email Ms. Erickson regarding: class contacts	\$550.00	0.2	\$110.00								
1/28/2020	Megan Yarnall	Review and revise mailing list	\$550.00	3.5	\$1,925.00								
1/29/2020	Karen Ellis	Respond to calls in response to emails	\$275.00	6.1	\$1,677.50								
1/29/2020	Karen Ellis	Review, respond to and organize emails received from potential class members	\$275.00	2	\$550.00								
1/29/2020	Megan Yarnall	Discuss class member contacts with Ms. Ellis	\$550.00	0.3	\$165.00								
1/29/2020	Megan Yarnall	Discuss mailing with Chris Healey	\$550.00	0.4	\$220.00								
1/29/2020	Megan Yarnall	Discuss with Ms. Juarez	\$550.00	0.2	\$110.00								
1/29/2020	Megan Yarnall	Draft letter to class members	\$550.00	1.1	\$605.00								
1/29/2020	Megan Yarnall	Review contacts for mass mailing	\$550.00	1	\$550.00								
1/29/2020	Megan Yarnall	Review DSS files and management agreements and email Mr. Needham regarding: same	\$550.00	2	\$1,100.00								
1/30/2020	Karen Ellis	Respond to calls in response to emails	\$275.00	5.1	\$1,402.50								
1/30/2020	Karen Ellis	Review, respond to and organize emails received from potential class members	\$275.00	1.7	\$467.50								
1/30/2020	Megan Yarnall	Discuss with Mr. Needham	\$550.00	0.2	\$110.00								
1/31/2020	Karen Ellis	Conference with Mr. Needham and Ms. Yarnall regarding correspondence from defense counsel regarding e-mails	\$275.00	0.4	\$110.00								
1/31/2020	Karen Ellis	Forward example of e-mail to Ms. Yarnall	\$275.00	0.2	\$55.00								
1/31/2020	Karen Ellis	Forward inquires from NY Times	\$275.00	0.2	\$55.00								
1/31/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	4.9	\$1,347.50								
1/31/2020	Karen Ellis	Review revised letter	\$275.00	0.4	\$110.00								
1/31/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members	\$275.00	0.9	\$247.50								
1/31/2020	Karen Ellis	Work with Ms. Yarnall on sending e-mails to putative class members	\$275.00	0.5	\$137.50								
1/31/2020	Megan Yarnall	Discuss email from defense counsel re class outreach with Ms. Ellis and Mr. Needham	\$550.00	0.2	\$110.00								
1/31/2020	Megan Yarnall	Draft letter to class members regarding correction to previous correspondence	\$550.00	0.7	\$385.00								
1/31/2020	Megan Yarnall	Draft letter to defense counsel	\$550.00	0.4	\$220.00								

Fees

Date	Time Keeper	Task Description	Hourly	Hours	Fee (Rate x Hours)	Lodestar Reductions		CC Confs	Fees	Falkenberg	Fees	Travel	Fees
			Rate	worked		General	Hrs						
1/31/2020	Megan Yarnall	Email class members regarding: correction to previous correspondence	\$550.00	0.5	\$275.00								
1/31/2020	Megan Yarnall	Email Mr. Healey regarding email from defense counsel re class outreach	\$550.00	0.2	\$110.00								
1/31/2020	Megan Yarnall	Review correspondence from defense counsel	\$550.00	0.2	\$110.00								
2/2/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	4.1	\$1,127.50								
2/2/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members	\$275.00	0.4	\$110.00								
2/3/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	3.7	\$1,017.50								
2/3/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members	\$275.00	0.5	\$137.50								
2/3/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.3	\$82.50								
2/3/2020	Megan Yarnall	Discuss with Ms. Ellis and Ms. Juarez	\$550.00	0.2	\$110.00								
2/3/2020	Megan Yarnall	Email Ms. Erickson regarding: contacts with class members	\$550.00	0.2	\$110.00								
2/3/2020	Megan Yarnall	Prepare letters to class members	\$550.00	0.9	\$495.00								
2/4/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	5.9	\$1,622.50								
2/4/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members	\$275.00	0.8	\$220.00								
2/4/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.3	\$82.50								
2/4/2020	Megan Yarnall	Discuss class member calls with Ms. Ellis	\$550.00	0.2	\$110.00								
2/4/2020	Megan Yarnall	Review correspondence regarding: which facilities to sample data	\$550.00	0.2	\$110.00								
2/5/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	5.6	\$1,540.00								
2/5/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members	\$275.00	1.1	\$302.50								
2/5/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.3	\$82.50								
2/5/2020	Megan Yarnall	Review feedback from class members and DSS citation and complaint data to choose facilities to sample data and email Mr. Healey regarding: same	\$550.00	1.3	\$715.00								
2/6/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	5.7	\$1,567.50								
2/6/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members	\$275.00	0.8	\$220.00								
2/6/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.5	\$137.50								
2/6/2020	Megan Yarnall	Discuss data on citations with Mr. Healey	\$550.00	0.2	\$110.00								
2/6/2020	Megan Yarnall	Review data on citations for Sunrise facilities	\$550.00	0.6	\$330.00								
2/7/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	5.9	\$1,622.50								
2/7/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members	\$275.00	1.2	\$330.00								
2/7/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.7	\$192.50								
2/7/2020	Megan Yarnall	Discuss class member calls with Ms. Ellis	\$550.00	0.3	\$165.00								
2/7/2020	Megan Yarnall	Draft memo to Mr. Healey regarding class member calls	\$550.00	0.2	\$110.00								
2/7/2020	Megan Yarnall	Review log of class member calls	\$550.00	0.4	\$220.00								
2/10/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	4.3	\$1,182.50								
2/10/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members	\$275.00	2	\$550.00								
2/10/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.3	\$82.50								
2/10/2020	Megan Yarnall	Discuss calls with class members with Ms. Ellis	\$550.00	0.2	\$110.00								
2/11/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	5.8	\$1,595.00								
2/11/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members	\$275.00	0.8	\$220.00								
2/11/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00								
2/11/2020	Megan Yarnall	Discuss class contacts with Brian Umpierre	\$550.00	0.3	\$165.00								
2/12/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	6.4	\$1,760.00								
2/12/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members	\$275.00	0.6	\$165.00								
2/12/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.6	\$165.00								
2/12/2020	Megan Yarnall	Discuss class member calls with Ms. Ellis	\$550.00	0.2	\$110.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
2/13/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	4.9	\$1,347.50								
2/13/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members	\$275.00	0.9	\$247.50								
2/13/2020	Karen Ellis	Scan and copy documents received from putative class members to computer	\$275.00	0.2	\$55.00								
2/13/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.3	\$82.50								
2/14/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	4.2	\$1,155.00								
2/14/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members	\$275.00	1	\$275.00								
2/14/2020	Karen Ellis	Scan and copy documents received from putative class members to computer	\$275.00	0.2	\$55.00								
2/14/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.3	\$82.50								
2/19/2020	Karen Ellis	Conference with Ms. Yarnall regarding Ms. Fearn	\$275.00	0.2	\$55.00								
2/19/2020	Karen Ellis	Locate information from 2017 ad responses	\$275.00	0.2	\$55.00								
2/19/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	1.1	\$302.50								
2/19/2020	Karen Ellis	Review e-mail from Brian Umpierre regarding contact by Helen Ganz in 2017	\$275.00	0.2	\$55.00								
2/19/2020	Karen Ellis	review information regarding Amy Fearn	\$275.00	0.4	\$110.00								
2/19/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members;	\$275.00	2.7	\$742.50								
2/19/2020	Karen Ellis	Scan and copy documents received from putative class members to computer	\$275.00	0.2	\$55.00								
2/19/2020	Karen Ellis	Scan and e-mail notes and e-mails to Mr. Umpierre	\$275.00	0.3	\$82.50								
2/19/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.3	\$82.50								
2/19/2020	Megan Yarnall	Discuss class contracts with Ms. Ellis	\$550.00	0.2	\$110.00								
2/20/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	5.7	\$1,567.50								
2/20/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members	\$275.00	1.2	\$330.00								
2/20/2020	Karen Ellis	Scan and copy documents received from putative class members to computer	\$275.00	0.2	\$55.00								
2/20/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00								
2/21/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	5.5	\$1,512.50								
2/21/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members	\$275.00	0.6	\$165.00								
2/21/2020	Karen Ellis	Scan and copy documents received from putative class members to computer	\$275.00	0.2	\$55.00								
2/21/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.3	\$82.50								
2/21/2020	Megan Yarnall	Phone conference with Mr. Healey regarding: declarations from class members and class cert motion status	\$550.00	0.3	\$165.00								
2/23/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	0.8	\$220.00								
2/24/2020	Megan Yarnall	Email Mr. Healey regarding: Review of DSS records	\$550.00	0.2	\$110.00								
2/24/2020	Megan Yarnall	Review DSS records	\$550.00	0.5	\$275.00								
2/24/2020	Megan Yarnall	Update list of Sunrise facilities and capacities of each	\$550.00	0.3	\$165.00								
2/25/2020	Megan Yarnall	Review and summarize DSS citations	\$550.00	0.4	\$220.00								
2/26/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	1.9	\$522.50								
2/26/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members	\$275.00	0.3	\$82.50								
2/26/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00								
2/27/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	1.6	\$440.00								
2/27/2020	Karen Ellis	Review, respond to and organize e-mails received from putative class members	\$275.00	0.3	\$82.50								
2/27/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00								
2/27/2020	Megan Yarnall	Discuss case status with Mr. Healey	\$550.00	0.2	\$110.00								
2/28/2020	Megan Yarnall	Review correspondence re: proposed modifications to protective order	\$550.00	0.2	\$110.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
3/2/2020	Megan Yarnall	Review correspondence	\$550.00	0.2	\$110.00								
3/3/2020	Karen Ellis	Conference with Ms. Yarnall regarding Declarations	\$275.00	0.2	\$55.00								
3/3/2020	Megan Yarnall	Conference call with co-counsel to discuss case status and to dos	\$550.00	0.6	\$330.00			0.6	\$		330.00		
3/3/2020	Megan Yarnall	Review correspondence, look up DSS citations and details for Alta Loma, Beverly Hills and other sample data facilities and email Mr Healey and Mr Kawamoto regarding: same	\$550.00	1.1	\$605.00								
3/4/2020	Megan Yarnall	Email Mr. Umpierre regarding: contacts with Sunrise class members and opposing counsel	\$550.00	0.2	\$110.00								
3/4/2020	Megan Yarnall	Review and summarize DSS citations for sunrise facilities	\$550.00	3.4	\$1,870.00								
3/5/2020	Karen Ellis	Phone call with Vivian Huddleston	\$275.00	0.7	\$192.50								
3/5/2020	Megan Yarnall	Review and summarize DSS citations for sunrise facilities	\$550.00	1.7	\$935.00								
3/6/2020	Megan Yarnall	Review and summarize DSS citations for sunrise facilities	\$550.00	0.4	\$220.00								
3/9/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	1.1	\$302.50								
3/9/2020	Karen Ellis	Review, respond to and organize voice mail messages and e-mails received from putative class members	\$275.00	0.3	\$82.50								
3/9/2020	Megan Yarnall	Review and summarize DSS records and Email Mr. Umpierre regarding: same	\$550.00	1.5	\$825.00								
3/10/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	0.3	\$82.50								
3/10/2020	Karen Ellis	Review, respond to and organize voice mail messages and e-mails received from putative class members	\$275.00	0.2	\$55.00								
3/10/2020	Megan Yarnall	Discuss class member phone calls with Ms. Ellis	\$550.00	0.1	\$55.00								
3/10/2020	Megan Yarnall	Review correspondence regarding: document production and DSS records	\$550.00	0.2	\$110.00								
3/11/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	0.3	\$82.50								
3/11/2020	Megan Yarnall	Review correspondence, review and summarize DSS records	\$550.00	2.9	\$1,595.00								
3/12/2020	Karen Ellis	Review, respond to and organize voice mail messages and e-mails received from putative class members	\$275.00	0.3	\$82.50								
3/12/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	0.5	\$137.50								
3/12/2020	Megan Yarnall	Review and reply to correspondence regarding: discovery production status and from "happy camper", discuss same with Ms. Ellis	\$550.00	0.3	\$165.00								
3/13/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	0.7	\$192.50								
3/13/2020	Karen Ellis	Review and organize notes and documents received to date	\$275.00	0.2	\$55.00								
3/13/2020	Karen Ellis	Review, respond to and organize voice mail messages and e-mails received from putative class members	\$275.00	0.3	\$82.50								
3/13/2020	Megan Yarnall	Discuss declarations with Ms. Ellis	\$550.00	0.4	\$220.00								
3/13/2020	Megan Yarnall	Review correspondence regarding: declarations and template from Mr. Foss	\$550.00	0.2	\$110.00								
3/13/2020	Megan Yarnall	Review correspondence regarding: document production	\$550.00	0.2	\$110.00								
3/16/2020	Megan Yarnall	Email Mr. Foss regarding: class member declarations	\$550.00	0.1	\$55.00								
3/16/2020	Megan Yarnall	Email Mr. Umpierre regarding: document production	\$550.00	0.1	\$55.00								
3/16/2020	Megan Yarnall	Review correspondence	\$550.00	0.1	\$55.00								
3/16/2020	Megan Yarnall	Review management and lease agreements from DSS files and email Mr. Healey regarding: same	\$550.00	0.7	\$385.00								
3/17/2020	Megan Yarnall	Review and summarize DSS data	\$550.00	3.9	\$2,145.00								
3/18/2020	Megan Yarnall	Phone call with Ms. Warren regarding: status of class cert briefing and related tasks	\$550.00	0.5	\$275.00								
3/18/2020	Megan Yarnall	Review and summarize DSS Data and email Mr. Healey regarding: same	\$550.00	4.6	\$2,530.00								
3/19/2020	Megan Yarnall	Phone call with co-counsel	\$550.00	0.4	\$220.00								
3/19/2020	Megan Yarnall	Update DSS data summary	\$550.00	0.9	\$495.00								
3/23/2020	Megan Yarnall	Discuss status with Ms. Ellis	\$550.00	0.2	\$110.00								
3/24/2020	Megan Yarnall	Review correspondence	\$550.00	0.2	\$110.00								
3/25/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	1.2	\$330.00								
3/25/2020	Karen Ellis	Review, respond to and organize voice mail messages and e-mails received from putative class members	\$275.00	0.6	\$165.00								

Fees

Date	Time Keeper	Task Description	Hourly	Hours	Fee (Rate x Hours)	Lodestar Reductions		CC Confs	Fees	Falkenberg	Fees	Travel	Fees
			Rate	worked		General	Hrs						
3/25/2020	Megan Yarnall	Review and summarize citations issued by DSS for class certification brief	\$550.00	3.8	\$2,090.00								
3/26/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	1.9	\$522.50								
3/26/2020	Karen Ellis	Review, respond to and organize voice mail messages and e-mails received from putative class members	\$275.00	0.4	\$110.00								
3/26/2020	Megan Yarnall	Discuss class member calls with Ms. Ellis	\$550.00	0.2	\$110.00								
3/26/2020	Megan Yarnall	Email Mr. Healey regarding class cert motion	\$550.00	0.2	\$110.00								
3/26/2020	Megan Yarnall	Review and reply to correspondence regarding: DSS citations	\$550.00	0.3	\$165.00								
3/26/2020	Megan Yarnall	Review and revise class certification motion	\$550.00	4	\$2,200.00								
3/27/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	1.5	\$412.50								
3/27/2020	Karen Ellis	Review, respond to and organize voice mail messages and e-mails received from putative class members	\$275.00	0.3	\$82.50								
3/30/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	2.1	\$577.50								
3/30/2020	Karen Ellis	Review, respond to and organize voice mail messages and e-mails received from putative class members	\$275.00	0.2	\$55.00								
3/30/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00								
3/31/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	1.3	\$357.50								
3/31/2020	Karen Ellis	Review, respond to and organize voice mail messages and e-mails received from putative class members	\$275.00	0.3	\$82.50								
3/31/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00								
3/31/2020	Megan Yarnall	Review correspondence re class outreach, discuss same with Mr. Needham	\$550.00	0.3	\$165.00								
4/1/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	0.8	\$220.00								
4/1/2020	Megan Yarnall	Review correspondence	\$550.00	0.2	\$110.00								
4/2/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	0.3	\$82.50								
4/2/2020	Karen Ellis	Review and respond to voice mail messages	\$275.00	0.3	\$82.50								
4/3/2020	Karen Ellis	Emails to/from MAY re calls with class members	\$275.00	0.2	\$55.00								
4/3/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	0.7	\$192.50								
4/3/2020	Karen Ellis	Review and respond to voice mail messages	\$275.00	0.3	\$82.50								
4/3/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00								
4/3/2020	Megan Yarnall	Phone conference with co-counsel regarding: case status, scheduling, and discovery issues	\$550.00	0.4	\$220.00								
4/3/2020	Megan Yarnall	Review correspondence with Ms. Ellis re class members	\$550.00	0.2	\$110.00								
4/7/2020	Karen Ellis	Compute numbers and highlight facilities covered and email to MAY	\$275.00	0.4	\$110.00								
4/7/2020	Karen Ellis	Review email from MAY re number of calls and facilities covered	\$275.00	0.2	\$55.00								
4/7/2020	Megan Yarnall	Email Ms. Ellis regarding: potential class member declarations	\$550.00	0.1	\$55.00								
4/7/2020	Megan Yarnall	Review correspondence regarding: same	\$550.00	0.1	\$55.00								
4/8/2020	Karen Ellis	Email Ms. Yarnall regarding same	\$275.00	0.2	\$55.00								
4/8/2020	Karen Ellis	Review regarding facilities covered in complaints	\$275.00	0.6	\$165.00								
4/8/2020	Karen Ellis	Review status spreadsheet re number of calls from putative class members involved complaints	\$275.00	0.7	\$192.50								
4/8/2020	Megan Yarnall	Email co-counsel regarding: DSS citations	\$550.00	0.2	\$110.00								
4/8/2020	Megan Yarnall	Email Mr. Healey regarding: cash contribution and draft letter	\$550.00	0.1	\$55.00								
4/8/2020	Megan Yarnall	Email Mr. Healey regarding: same	\$550.00	0.1	\$55.00								
4/8/2020	Megan Yarnall	Email Ms. Thompson regarding: same	\$550.00	0.1	\$55.00								
4/8/2020	Megan Yarnall	Review report regarding: staffing analysis	\$550.00	0.3	\$165.00								
4/8/2020	Megan Yarnall	Review status of calls with potential class members	\$550.00	0.1	\$55.00								
4/8/2020	Megan Yarnall	Revise brief insert regarding: DSS citations	\$550.00	0.7	\$385.00								
4/8/2020	Megan Yarnall	Revise summary exhibit regarding: DSS citations	\$550.00	0.5	\$275.00								
4/9/2020	Karen Ellis	P/C with MAY re status	\$275.00	0.2	\$55.00								
4/9/2020	Karen Ellis	Review notes re calls in response to e-mails and Belaire notice, review same re status	\$275.00	4.8	\$1,320.00								
4/9/2020	Megan Yarnall	Discuss case status with Ms. Ellis	\$550.00	0.2	\$110.00								
4/9/2020	Megan Yarnall	Prepare template declaration for potential class members	\$550.00	1.1	\$605.00								
4/9/2020	Megan Yarnall	Review correspondence regarding: document production	\$550.00	0.2	\$110.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
4/9/2020	Megan Yarnall	Review DSS citations, summarize same	\$550.00	1.3	\$715.00								
4/10/2020	Karen Ellis	P/C with MAY re status	\$275.00	0.2	\$55.00								
4/10/2020	Karen Ellis	Review and organize notes re calls in response to e-mails and Belaire notice, review same re status	\$275.00	3	\$825.00								
4/13/2020	Megan Yarnall	Phone conference with Mr. Healey regarding: DSS citation portion of class cert brief	\$550.00	0.4	\$220.00								
4/13/2020	Megan Yarnall	Pull DSS citations and organize as exhibits	\$550.00	1.4	\$770.00								
4/13/2020	Megan Yarnall	Review correspondence regarding DSS citation and brief	\$550.00	0.2	\$110.00								
4/14/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	0.9	\$247.50								
4/14/2020	Karen Ellis	Review, respond to and organize voice mail messages and e-mails received from putative class members	\$275.00	0.4	\$110.00								
4/14/2020	Megan Yarnall	Email Mr. Healey regarding: DSS portion of brief	\$550.00	0.2	\$110.00								
4/14/2020	Megan Yarnall	Pull, organize, and review DSS documents for exhibits for class certification brief	\$550.00	1.3	\$715.00								
4/14/2020	Megan Yarnall	revise class certification brief language regarding: DSS citations	\$550.00	0.8	\$440.00								
4/15/2020	Karen Ellis	Respond to calls in response to e-mails	\$275.00	5.5	\$1,512.50								
4/15/2020	Karen Ellis	Review, respond to and organize voice mail messages and e-mails received from putative class members	\$275.00	0.4	\$110.00								
4/15/2020	Megan Yarnall	Pull and organize DSS exhibits to class certification brief	\$550.00	3.3	\$1,815.00								
4/16/2020	Karen Ellis	Respond to calls from putative class members in response to e-mails	\$275.00	5.8	\$1,595.00								
4/16/2020	Karen Ellis	Review and organize responses to Belaire Notices	\$275.00	0.5	\$137.50								
4/16/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00								
4/16/2020	Megan Yarnall	Pull DSS citation documents, review and summarize	\$550.00	5.2	\$2,860.00								
4/17/2020	Karen Ellis	E-mails from/to MAY re class certification motion deadlines and declarations	\$275.00	0.3	\$82.50								
4/17/2020	Karen Ellis	Organize and draft memo re notes from potential declarant conversations	\$275.00	3.5	\$962.50								
4/17/2020	Megan Yarnall	Email Ms. Ellis regarding: status of class certification motion	\$550.00	0.2	\$110.00								
4/17/2020	Megan Yarnall	Review and revise brief insert regarding: DSS citations and prepare exhibits regarding: same	\$550.00	1.6	\$880.00								
4/17/2020	Megan Yarnall	Review correspondence re motion drafts	\$550.00	0.2	\$110.00								
4/20/2020	Karen Ellis	Preparation of contact status spreadsheet	\$275.00	3.1	\$852.50								
4/20/2020	Karen Ellis	Review notes and documents from Belaire notice	\$275.00	0.3	\$82.50								
4/20/2020	Karen Ellis	Scan additional documents received from putative class members	\$275.00	0.2	\$55.00								
4/21/2020	Karen Ellis	Attempt to contact putative class members	\$275.00	1.3	\$357.50								
4/21/2020	Megan Yarnall	Revise draft declaration for potential class members and email Ms. Ellis regarding: same	\$550.00	1.6	\$880.00								
4/22/2020	Karen Ellis	p/c with putative class members	\$275.00	2.4	\$660.00								
4/22/2020	Karen Ellis	Review and scan notes	\$275.00	0.2	\$55.00								
4/23/2020	Karen Ellis	Review and scan additional notes	\$275.00	0.2	\$55.00								
4/23/2020	Karen Ellis	Telephone conference with putative class members	\$275.00	4.6	\$1,265.00								
4/23/2020	Karen Ellis	Telephone conference with MAY re status of declarations	\$275.00	0.2	\$55.00								
4/23/2020	Megan Yarnall	Conference call with co-counsel	\$550.00	0.6	\$330.00			0.6	\$	330.00			
4/23/2020	Megan Yarnall	Discuss declarations with Ms. Ellis	\$550.00	0.2	\$110.00								
4/23/2020	Megan Yarnall	Discuss with Ms. Ellis	\$550.00	0.6	\$330.00								
4/23/2020	Megan Yarnall	Draft and revise potential class member declarations	\$550.00	1.6	\$880.00								
4/24/2020	Karen Ellis	Emails to putative class members regarding locating documents	\$275.00	0.8	\$220.00								
4/24/2020	Karen Ellis	Preparation of declaration status spreadsheet	\$275.00	0.5	\$137.50								
4/24/2020	Karen Ellis	Review declaration template	\$275.00	0.3	\$82.50								
4/24/2020	Karen Ellis	Review notes re status of potential declarants	\$275.00	0.2	\$55.00								
4/24/2020	Karen Ellis	Telephone conference with with MAY re declarations	\$275.00	0.2	\$55.00								
4/24/2020	Karen Ellis	Telephone conference with with putative class members regarding same;	\$275.00	4.6	\$1,265.00								
4/24/2020	Megan Yarnall	Discuss declarations with Karen	\$550.00	0.2	\$110.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
4/24/2020	Megan Yarnall	Draft declarations of putative class members	\$550.00	3.8	\$2,090.00								
4/24/2020	Megan Yarnall	Email Mr. Umpierre and Mr. Wallace regarding declarations	\$550.00	0.2	\$110.00								
4/27/2020	Karen Ellis	E-mails from/to MAY re declarations	\$275.00	0.3	\$82.50								
4/27/2020	Karen Ellis	Prepare interview intakes	\$275.00	0.2	\$55.00								
4/27/2020	Karen Ellis	Review declaration list and e-mail putative class members re providing documents	\$275.00	0.5	\$137.50								
4/27/2020	Karen Ellis	Review documents from declarants	\$275.00	0.4	\$110.00								
4/27/2020	Karen Ellis	Review list of contacts to be provided to the Wallace Firm	\$275.00	0.3	\$82.50								
4/27/2020	Karen Ellis	Revise draft declarations and email to declarants	\$275.00	1.5	\$412.50								
4/27/2020	Karen Ellis	Telephone conference with putative class members re declarations	\$275.00	4.2	\$1,155.00								
4/27/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00								
4/27/2020	Megan Yarnall	Discuss declarations with Ms. Ellis	\$550.00	0.3	\$165.00								
4/27/2020	Megan Yarnall	Draft class member declarations	\$550.00	4.6	\$2,530.00								
4/27/2020	Megan Yarnall	Email Mr. Wallace regarding declarations	\$550.00	0.2	\$110.00								
4/28/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00								
4/28/2020	Karen Ellis	E-mail additional putative class members regarding providing documents	\$275.00	1.5	\$412.50								
4/28/2020	Karen Ellis	Revise draft declarations and email to declarants	\$275.00	1.4	\$385.00								
4/28/2020	Karen Ellis	Telephone conference with putative class members regarding declarations	\$275.00	4.5	\$1,237.50								
4/28/2020	Megan Yarnall	Draft and revise declarations for potential class members and email Ms. Ellis and Mr. Wallace regarding: same	\$550.00	4.2	\$2,310.00								
4/29/2020	Karen Ellis	E-mail additional putative class members regarding providing documents	\$275.00	0.3	\$82.50								
4/29/2020	Karen Ellis	Revise draft declarations and email to declarants	\$275.00	2	\$550.00								
4/29/2020	Karen Ellis	Telephone conference with putative class members regarding declarations	\$275.00	4.7	\$1,292.50								
4/29/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00								
4/29/2020	Megan Yarnall	Draft and revise declarations for potential class members and email Ms. Ellis regarding: same	\$550.00	3.5	\$1,925.00								
4/30/2020	Karen Ellis	E-mail additional putative class members regarding providing documents	\$275.00	0.9	\$247.50								
4/30/2020	Karen Ellis	Revise draft declarations and email to declarants	\$275.00	1.1	\$302.50								
4/30/2020	Karen Ellis	Telephone conference with putative class members re declarations	\$275.00	5.1	\$1,402.50								
4/30/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00								
4/30/2020	Megan Yarnall	Draft declarations for potential class members	\$550.00	3.8	\$2,090.00								
4/30/2020	Megan Yarnall	Email Ms. Ellis regarding: same	\$550.00	0.2	\$110.00								
4/30/2020	Megan Yarnall	Review documents regarding: same	\$550.00	0.8	\$440.00								
5/1/2020	Karen Ellis	E-mail additional putative class members regarding providing documents	\$275.00	0.5	\$137.50								
5/1/2020	Karen Ellis	Phone call with Ms. Yarnall regarding status	\$275.00	0.2	\$55.00								
5/1/2020	Karen Ellis	Phone call with putative class members regarding declarations	\$275.00	5.1	\$1,402.50								
5/1/2020	Karen Ellis	Revise draft declarations and email to declarants	\$275.00	2.2	\$605.00								
5/1/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00								
5/1/2020	Megan Yarnall	Discuss with Ms. Ellis	\$550.00	0.2	\$110.00								
5/1/2020	Megan Yarnall	Draft potential class member declarations	\$550.00	2.3	\$1,265.00								
5/1/2020	Megan Yarnall	Phone call with Ms. Erickson regarding: case status	\$550.00	0.2	\$110.00								
5/1/2020	Megan Yarnall	Review potential class member documents	\$550.00	0.9	\$495.00								
5/4/2020	Karen Ellis	E-mail additional putative class members regarding providing documents	\$275.00	0.4	\$110.00								
5/4/2020	Karen Ellis	Phone call with putative class members regarding declarations	\$275.00	4.8	\$1,320.00								
5/4/2020	Karen Ellis	Revise draft declarations and email to declarants	\$275.00	2.2	\$605.00								
5/4/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00								
5/4/2020	Megan Yarnall	Draft declarations for potential class members, email Ms. Ellis regarding: same	\$550.00	4.5	\$2,475.00								
5/5/2020	Karen Ellis	E-mail additional putative class members regarding providing documents	\$275.00	0.7	\$192.50								
5/5/2020	Karen Ellis	Phone call with putative class members regarding declarations	\$275.00	4.1	\$1,127.50								
5/5/2020	Karen Ellis	Revise draft declarations and email to declarants	\$275.00	2.2	\$605.00								
5/5/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00								

Fees

Date	Time Keeper	Task Description	Hourly	Hours	Fee (Rate x Hours)	Lodestar Reductions		CC Confs	Falkenberg	Travel	
			Rate	worked		General	Fees				
						Hrs	Fees	Hrs	Fees	Hrs	Fees
		Draft declarations for potential class members, email Ms. Ellis regarding:									
5/5/2020	Megan Yarnall	same	\$550.00	3.9	\$2,145.00						
5/6/2020	Karen Ellis	E-mail additional putative class members regarding providing documents	\$275.00	0.2	\$55.00						
5/6/2020	Karen Ellis	Phone call with putative class members regarding declarations	\$275.00	5.3	\$1,457.50						
5/6/2020	Karen Ellis	Revise draft declarations and email to declarants	\$275.00	1.2	\$330.00						
5/6/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00						
5/6/2020	Megan Yarnall	Draft declarations for potential class members	\$550.00	4.8	\$2,640.00						
5/6/2020	Megan Yarnall	Email Mr. Healey regarding: dss complaint documents and gather same	\$550.00	0.2	\$110.00						
5/6/2020	Megan Yarnall	Email Ms. Ellis regarding: declarations	\$550.00	0	\$0.00						
5/7/2020	Karen Ellis	E-mail additional putative class members regarding providing documents	\$275.00	0.3	\$82.50						
5/7/2020	Karen Ellis	Follow up with potential declarants regarding status of draft declarations	\$275.00	0.6	\$165.00						
5/7/2020	Karen Ellis	Phone call with putative class members regarding declarations	\$275.00	4.1	\$1,127.50						
5/7/2020	Karen Ellis	Revise draft declarations and email to declarants	\$275.00	2.1	\$577.50						
5/7/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00						
		Review correspondence regarding: Sunrise operations manual for executive									
5/7/2020	Megan Yarnall	directors	\$550.00	0.2	\$110.00						
5/8/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00						
5/8/2020	Karen Ellis	E-mail additional putative class members regarding providing documents	\$275.00	0.6	\$165.00						
5/8/2020	Karen Ellis	Follow up with potential declarants regarding status of draft declarations	\$275.00	0.4	\$110.00						
5/8/2020	Karen Ellis	Phone call with putative class members regarding declarations	\$275.00	3.9	\$1,072.50						
5/8/2020	Karen Ellis	Revise draft declarations and email to declarants	\$275.00	1.5	\$412.50						
		Draft declarations for potential class members and email Ms. Ellis and Mr.									
5/8/2020	Megan Yarnall	Umpierre regarding: same	\$550.00	4.1	\$2,255.00						
5/8/2020	Megan Yarnall	Email Mr. Healey regarding: which facilities offer Terrace club option	\$550.00	0.2	\$110.00						
5/11/2020	Karen Ellis	E-mail additional putative class members regarding providing documents	\$275.00	0.4	\$110.00						
5/11/2020	Karen Ellis	Follow up with potential declarants regarding status of draft declarations	\$275.00	0.5	\$137.50						
5/11/2020	Karen Ellis	Phone call with putative class members regarding declarations	\$275.00	3.6	\$990.00						
5/11/2020	Karen Ellis	Revise draft declarations and email to declarants	\$275.00	2	\$550.00						
5/11/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00						
5/11/2020	Megan Yarnall	Draft and revise declarations and email Ms. Ellis regarding: same	\$550.00	3.3	\$1,815.00						
		Email Mr. Umpierre regarding: documents obtained from declarant putative									
5/11/2020	Megan Yarnall	class members	\$550.00	0.2	\$110.00						
		Review correspondence regarding: declarations of putative class members;									
5/11/2020	Megan Yarnall		\$550.00	0.2	\$110.00						
5/12/2020	Karen Ellis	Conference with Ms. Yarnall regarding adding paragraph to all declarations	\$275.00	0.3	\$82.50						
5/12/2020	Karen Ellis	Follow up with potential declarants regarding status of draft declarations	\$275.00	0.5	\$137.50						
5/12/2020	Karen Ellis	Phone call with putative class members regarding declarations	\$275.00	3	\$825.00						
5/12/2020	Karen Ellis	Revise draft declarations and email to declarants	\$275.00	4.1	\$1,127.50						
5/12/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00						
5/12/2020	Megan Yarnall	Discuss same with Ms. Ellis	\$550.00	0.3	\$165.00						
5/12/2020	Megan Yarnall	Draft class member declarations	\$550.00	4	\$2,200.00						
5/12/2020	Megan Yarnall	Email Ms. Ellis regarding: same	\$550.00	0.2	\$110.00						
5/12/2020	Megan Yarnall	Review correspondence regarding: class member declarations	\$550.00	0.2	\$110.00						
5/13/2020	Karen Ellis	Follow up with potential declarants re status of draft declarations	\$275.00	1	\$275.00						
5/13/2020	Karen Ellis	Phone call with putative class members re declarations	\$275.00	3.2	\$880.00						
5/13/2020	Karen Ellis	Revise draft declarations and email to declarants	\$275.00	4	\$1,100.00						
5/13/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00						
5/13/2020	Megan Yarnall	Discuss class member declarations with Ms. Ellis	\$550.00	0.2	\$110.00						
5/13/2020	Megan Yarnall	Edit class cert brief regarding: DSS citations and complaints	\$550.00	2.6	\$1,430.00						
5/13/2020	Megan Yarnall	Email Mr. Healey regarding: status of DSS citations	\$550.00	0.2	\$110.00						
5/13/2020	Megan Yarnall	Email Mr. Kawamoto re: class member declarations	\$550.00	0.2	\$110.00						
5/13/2020	Megan Yarnall	Review declarations collected to date	\$550.00	0.8	\$440.00						
5/14/2020	Karen Ellis	Follow up with potential declarants re status of draft declarations	\$275.00	0.5	\$137.50						

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
5/14/2020	Karen Ellis	Phone call with putative class members re declarations	\$275.00	2.5	\$687.50								
5/14/2020	Karen Ellis	Revise draft declarations and email to declarants	\$275.00	5	\$1,375.00								
5/14/2020	Karen Ellis	Update status spreadsheet	\$275.00	0.2	\$55.00								
5/14/2020	Megan Yarnall	Check DSS website regarding: additional complaints and citations	\$550.00	1.1	\$605.00								
5/14/2020	Megan Yarnall	Draft declaration iso class certification motion	\$550.00	1.6	\$880.00								
5/14/2020	Megan Yarnall	Email Mr. Healey regarding draft motion for class cert	\$550.00	0.2	\$110.00								
5/14/2020	Megan Yarnall	Review and revise draft motion for class certification	\$550.00	0.9	\$495.00								
5/14/2020	Megan Yarnall	Review and revise supporting exhibits	\$550.00	1.1	\$605.00								
5/15/2020	Karen Ellis	E-mail putative class members regarding receipt of declarations	\$275.00	0.5	\$137.50								
5/15/2020	Karen Ellis	E-mails to/from putative class members regarding declarations	\$275.00	1.8	\$495.00								
5/15/2020	Karen Ellis	Final review of declarations	\$275.00	5	\$1,375.00								
5/15/2020	Megan Yarnall	Discuss all re motion with co-counsel	\$550.00	0.5	\$275.00								
5/15/2020	Megan Yarnall	Draft Yarnall declaration in support of motion for class certification,	\$550.00	4	\$2,200.00								
5/15/2020	Megan Yarnall	Prepare, review and revise exhibits for same	\$550.00	4	\$2,200.00								
5/15/2020	Megan Yarnall	Review and finalize putative class member declarations and discuss with Ms. Ellis,	\$550.00	0.6	\$330.00								
5/15/2020	Megan Yarnall	Review and revise motion for class certification	\$550.00	1.2	\$660.00								
5/16/2020	Megan Yarnall	Revise and review class certification brief, Yarnall declaration, revise exhibits and email co-counsel regarding: same	\$550.00	2.4	\$1,320.00								
5/18/2020	Megan Yarnall	Email Mr. Johnson regarding: declarations	\$550.00	0.2	\$110.00								
5/18/2020	Megan Yarnall	Review and revise my declaration in support of motion for class certification	\$550.00	1.2	\$660.00								
5/18/2020	Megan Yarnall	Review revised declarations in support of motion for class certification and motion for class certification	\$550.00	1	\$550.00								
5/19/2020	Karen Ellis	Preparation of recap to track receipt of originals	\$275.00	3	\$825.00								
5/19/2020	Karen Ellis	Review and save scanned original declarations received from declarants into folder	\$275.00	0.8	\$220.00								
5/19/2020	Megan Yarnall	Check for possession of clawed back discovery documents and email Mr. Healey regarding: same	\$550.00	0.3	\$165.00								
5/19/2020	Megan Yarnall	Email Ms. Ellis regarding claw back	\$550.00	0.2	\$110.00								
5/20/2020	Karen Ellis	Review notes re additional class reps and those who did not sign arbitration agreement	\$275.00	1.4	\$385.00						1.4	\$	385.00
5/20/2020	Megan Yarnall	Review correspondence regarding: discovery status	\$550.00	0.2	\$110.00								
5/21/2020	Karen Ellis	E-mails to/from declarants regarding status of mailing original declarations	\$275.00	0.4	\$110.00								
5/21/2020	Karen Ellis	E-mail Ms. Yarnall regarding class reps	\$275.00	0.2	\$55.00						0.2	\$	55.00
5/21/2020	Karen Ellis	Review additional notes regarding additional class representatives and those who did not sign arbitration agreement	\$275.00	1.2	\$330.00						1.2	\$	330.00
5/21/2020	Megan Yarnall	Review correspondence from Ms. Ellis regarding: potential class rep	\$550.00	0.2	\$110.00						0.2	\$	110.00
5/21/2020	Megan Yarnall	Review potential representatives declaration	\$550.00	0.2	\$110.00						0.2	\$	110.00
5/22/2020	Karen Ellis	Phone call with Ms. Yarnall regarding status and potential additional class reps	\$275.00	0.3	\$82.50						0.3	\$	82.50
5/22/2020	Karen Ellis	Review e-mails regarding class reps and witnesses	\$275.00	0.2	\$55.00						0.2	\$	55.00
5/22/2020	Megan Yarnall	Discuss case status with Ms. Ellis	\$550.00	0.2	\$110.00								
5/22/2020	Megan Yarnall	Discuss case status with Ms. Ellis	\$550.00	0.2	\$110.00								
5/22/2020	Megan Yarnall	Email Mr. Healey regarding: potential class representatives	\$550.00	0.2	\$110.00						0.2	\$	110.00
5/22/2020	Megan Yarnall	Review class member individual declarations	\$550.00	0.3	\$165.00								
5/26/2020	Megan Yarnall	Review correspondence regarding: witness disclosures and Dr. Flores	\$550.00	0.3	\$165.00								
5/27/2020	Karen Ellis	Scan and save additional original declarations	\$275.00	0.2	\$55.00								
5/27/2020	Karen Ellis	Update recap of all declarations	\$275.00	0.6	\$165.00								
5/27/2020	Megan Yarnall	Discuss potential class representatives with Ms. Ellis	\$550.00	0.2	\$110.00						0.2	\$	110.00
5/28/2020	Karen Ellis	E-mails from/to Mx. MB	\$275.00	0.3	\$82.50								
5/28/2020	Karen Ellis	Phone call with Ms. Yarnall regarding contacting declarants regarding potential class reps	\$275.00	0.2	\$55.00						0.2	\$	55.00

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
5/28/2020	Karen Ellis	Review regarding status of receipt of original declarations	\$275.00	0.4	\$110.00								
5/29/2020	Karen Ellis	Contact declarants regarding status of mailing original declarations	\$275.00	2.2	\$605.00								
5/29/2020	Karen Ellis	E-mail Mx. DG regarding same	\$275.00	0.2	\$55.00								
5/29/2020	Karen Ellis	Phone call with Peter Falkenberg regarding potential of becoming a class representative	\$275.00	0.5	\$137.50						0.5	\$	137.50
5/29/2020	Karen Ellis	Review notes and files regarding documents produced by non-declarants and scan same	\$275.00	0.3	\$82.50								
5/29/2020	Megan Yarnall	Draft privilege log	\$550.00	1	\$550.00								
5/29/2020	Megan Yarnall	Review and reply to correspondence from Mr. Umpierre regarding: privilege log and producing documents from declarants	\$550.00	0.2	\$110.00								
6/1/2020	Karen Ellis	Scan additional original declarations; update status spreadsheet	\$275.00	0.8	\$220.00								
6/2/2020	Megan Yarnall	Review correspondence and analysis regarding: arbitration agreements	\$550.00	0.4	\$220.00								
6/3/2020	Karen Ellis	E-mails to/from Ms. Yarnall regarding status of providing declarant documents	\$275.00	0.2	\$55.00								
6/3/2020	Karen Ellis	Review regarding status of receipt of original declarations	\$275.00	0.2	\$55.00								
6/3/2020	Megan Yarnall	Email Ms. Ellis regarding: documents produced by declarants	\$550.00	0.2	\$110.00								
6/3/2020	Megan Yarnall	Review documents produced by declarants to respond to discovery requests	\$550.00	0.7	\$385.00								
6/4/2020	Karen Ellis	Phone call with Ms. Yarnall regarding status of original declarations, potential class reps, privilege log information regarding documents and documents to be produced for declarants	\$275.00	0.6	\$165.00						0.6	\$	165.00
6/4/2020	Megan Yarnall	Review and catalogue documents received from potential declarants	\$550.00	0.5	\$275.00								
6/8/2020	Megan Yarnall	Draft privilege log	\$550.00	3.2	\$1,760.00								
6/8/2020	Megan Yarnall	Email Ms. Ellis and Mr. Umpierre regarding docs from declarants	\$550.00	0.2	\$110.00								
6/8/2020	Megan Yarnall	Review all documents provided by non-declarant putative class members	\$550.00	0.9	\$495.00								
6/9/2020	Karen Ellis	Compile information for privilege log	\$275.00	7.9	\$2,172.50								
6/9/2020	Karen Ellis	E-mails from/to Brian Umpierre	\$275.00	0.2	\$55.00								
6/9/2020	Karen Ellis	E-mails from/to Ms. Yarnall regarding privilege logs and documents	\$275.00	0.2	\$55.00								
6/9/2020	Karen Ellis	Phone call with MAY (2)	\$275.00	0.2	\$55.00								
6/9/2020	Karen Ellis	Review emails regarding privilege log	\$275.00	0.2	\$55.00								
6/9/2020	Megan Yarnall	Discuss with Mr. Umpierre and Ms. Ellis	\$550.00	0.4	\$220.00								
6/9/2020	Megan Yarnall	Draft and revise privilege log	\$550.00	5	\$2,750.00								
6/9/2020	Megan Yarnall	Prepare documents for production	\$550.00	1.6	\$880.00								
6/10/2020	Karen Ellis	E-mails from/to Brian Umpierre	\$275.00	0.2	\$55.00								
6/10/2020	Karen Ellis	Complete compilation of information for privilege log	\$275.00	5.5	\$1,512.50								
6/10/2020	Karen Ellis	E-mails from/to Ms. Yarnall regarding privilege logs and documents	\$275.00	0.2	\$55.00								
6/10/2020	Karen Ellis	Phone call with Ms. Yarnall (2)	\$275.00	0.2	\$55.00								
6/10/2020	Megan Yarnall	Draft and revise privilege log	\$550.00	2.2	\$1,210.00								
6/10/2020	Megan Yarnall	Email Ms. Ellis and Mr. Umpierre regarding: priv log	\$550.00	0.2	\$110.00								
6/10/2020	Megan Yarnall	Phone conference with Ms. Ellis regarding: priv log	\$550.00	0.2	\$110.00								
6/10/2020	Megan Yarnall	Review contacts with putative class members	\$550.00	1.6	\$880.00								
6/11/2020	Karen Ellis	E-mail Dr. Kurtzman forwarding declaration	\$275.00	0.3	\$82.50								
6/11/2020	Karen Ellis	E-mails from/to Ms. Yarnall regarding same	\$275.00	0.2	\$55.00								
6/11/2020	Karen Ellis	Organize files/notes following work on privilege log	\$275.00	0.2	\$55.00								
6/11/2020	Karen Ellis	Phone call with declarants regarding returning original declarations (3)	\$275.00	2.7	\$742.50								
6/11/2020	Karen Ellis	Review e-mails forwarding privilege log	\$275.00	0.2	\$55.00								
6/12/2020	Karen Ellis	Review e-mails regarding additional class representatives	\$275.00	0.2	\$55.00						0.2	\$	55.00
6/12/2020	Megan Yarnall	Discuss class member declarations and potential class reps with Ms. Ellis	\$550.00	0.2	\$110.00						0.2	\$	110.00
6/12/2020	Megan Yarnall	Email Mr. Healey regarding declarations	\$550.00	0.2	\$110.00								
6/12/2020	Megan Yarnall	Review class member declarations	\$550.00	0.6	\$330.00								
6/15/2020	Karen Ellis	E-mails to/from Ms. Yarnall regarding potential new class representatives	\$275.00	0.2	\$55.00						0.2	\$	55.00
6/15/2020	Karen Ellis	Review regarding status of originals	\$275.00	0.2	\$55.00								

Fees

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						General Hrs	Fees						
6/15/2020	Karen Ellis	Scan and save original declarations to folder	\$275.00	0.2	\$55.00								
6/15/2020	Megan Yarnall	Discuss case status with co-counsel	\$550.00	0.2	\$110.00								
6/19/2020	Karen Ellis	Phone call with Ms. Yarnall regarding status	\$275.00	0.2	\$55.00								
6/19/2020	Megan Yarnall	Discuss case status and schedule with co-counsel	\$550.00	0.5	\$275.00								
6/19/2020	Megan Yarnall	Email Kathryn Stebner regarding: potential new class reps	\$550.00	0.2	\$110.00						0.2	\$	110.00
6/22/2020	Karen Ellis	E-mail from/to Mx. AL regarding scheduling phone conference	\$275.00	0.2	\$55.00								
6/23/2020	Karen Ellis	E-mails from/to Guy Jara regarding original declaration	\$275.00	0.5	\$137.50								
6/23/2020	Karen Ellis	Phone call with Ms. Yarnall regarding contacting declarants regarding depositions	\$275.00	0.3	\$82.50								
6/23/2020	Megan Yarnall	Discuss depositions and declarants with Ms. Ellis	\$550.00	0.3	\$165.00								
6/23/2020	Megan Yarnall	Review and reply to correspondence regarding depositions	\$550.00	0.2	\$110.00								
6/23/2020	Megan Yarnall	Review documents produced by defendants	\$550.00	2.5	\$1,375.00								
6/24/2020	Karen Ellis	E-mail Ms. Yarnall regarding depositions	\$275.00	0.2	\$55.00								
6/24/2020	Karen Ellis	E-mails to witnesses forwarding copies of declaration and confirming Zoom phone conference	\$275.00	0.6	\$165.00								
6/24/2020	Karen Ellis	Phone calls with witnesses regarding availability for deposition and phone conference	\$275.00	1.3	\$357.50								
6/24/2020	Megan Yarnall	Discuss depositions with Mr. Needham	\$550.00	0.2	\$110.00								
6/24/2020	Megan Yarnall	Discuss depositions with Ms. Ellis	\$550.00	0.2	\$110.00								
6/24/2020	Megan Yarnall	Email Mr. Umpierre regarding: potential class reps	\$550.00	0.2	\$110.00						0.2	\$	110.00
6/24/2020	Megan Yarnall	Review and reply to correspondence regarding: declarant depositions	\$550.00	0.4	\$220.00								
6/24/2020	Megan Yarnall	Review documents produced by defendants regarding: declarants	\$550.00	0.4	\$220.00								
6/25/2020	Karen Ellis	Contact Peter Falkenberg	\$275.00	0.2	\$55.00						0.2	\$	55.00
6/25/2020	Karen Ellis	E-mails from/to Ms. Yarnall regarding contacting potential witnesses to schedule phone conference	\$275.00	0.2	\$55.00								
6/25/2020	Karen Ellis	Phone call with Alan Arora and Temma Roby regarding depositions	\$275.00	0.4	\$110.00								
6/25/2020	Karen Ellis	Review and summarize notes regarding depositions and additional original declaration	\$275.00	1.3	\$357.50								
6/25/2020	Megan Yarnall	Email Mr. Foss regarding: deposition availability	\$550.00	0.3	\$165.00								
6/25/2020	Megan Yarnall	Email Mr. Umpierre and Ms. Stebner regarding potential class reps	\$550.00	0.2	\$110.00						0.2	\$	110.00
6/25/2020	Megan Yarnall	Phone conference with Mr. Umpierre and Ms. Stebner regarding: potential class reps	\$550.00	0.5	\$275.00						0.5	\$	275.00
6/25/2020	Megan Yarnall	Preparation for deponent declarations	\$550.00	0.7	\$385.00								
6/25/2020	Megan Yarnall	Review documents and correspondence regarding: potential class reps	\$550.00	1.3	\$715.00						1.3	\$	715.00
6/26/2020	Karen Ellis	E-mail Ms. Yarnall regarding updated schedule	\$275.00	0.2	\$55.00								
6/26/2020	Karen Ellis	Phone call with Pete Falkenberg regarding phone conference re class rep	\$275.00	1.2	\$330.00						1.2	\$	330.00
6/26/2020	Karen Ellis	Phone call with Witness X regarding parents' stay at Sunrise Riverside	\$275.00	1.2	\$330.00								
6/26/2020	Karen Ellis	Review emails regarding phone conferences	\$275.00	0.2	\$55.00								
6/26/2020	Megan Yarnall	Review correspondence regarding: class rep phone calls and depositions and email Mr. Umpierre and Ms. Ellis regarding: same	\$550.00	0.4	\$220.00						0.4	\$	220.00
6/29/2020	Karen Ellis	E-mails from/to Kathryn Stebner and Brian Umpierre regarding status of former resident	\$275.00	0.4	\$110.00						0.4	\$	110.00
6/29/2020	Karen Ellis	Phone call with Ms. Yarnall regarding status of phone conferences with potential class representatives	\$275.00	0.8	\$220.00						0.8	\$	220.00
6/29/2020	Megan Yarnall	Discuss same with Ms. Ellis	\$550.00	0.8	\$440.00						0.8	\$	440.00
6/29/2020	Megan Yarnall	Google potential class representatives regarding: personal information available online.	\$550.00	2.3	\$1,265.00						2.3	\$	1,265.00
6/29/2020	Megan Yarnall	Phone conference with potential class representatives, Ms. Stebner, and Mr. Umpierre	\$550.00	0.5	\$275.00						0.5	\$	275.00
6/29/2020	Megan Yarnall	Review notes regarding: same	\$550.00	0.4	\$220.00						0.4	\$	220.00
6/30/2020	Karen Ellis	Review e-mails regarding potential class representatives	\$275.00	0.6	\$165.00						0.6	\$	165.00
6/30/2020	Megan Yarnall	Phone conference with Mr. Falkenberg regarding: becoming class representative	\$550.00	0.3	\$165.00						0.3	\$	165.00

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
6/30/2020	Megan Yarnall	Draft language for meet and confer and email Mr. Umpierre and Mr. Foss regarding: same	\$550.00	0.7	\$385.00								
6/30/2020	Megan Yarnall	Email Mr. Falkenberg, Mr. Arora, and Ms. Roby regarding: class representative agreement	\$550.00	0.3	\$165.00					0.3	\$	165.00	
6/30/2020	Megan Yarnall	Email Mr. Healey regarding: potential class representatives	\$550.00	1.1	\$605.00					1.1	\$	605.00	
6/30/2020	Megan Yarnall	Phone conference with Ms. Ellis regarding: potential class representatives	\$550.00	0.2	\$110.00					0.2	\$	110.00	
6/30/2020	Megan Yarnall	Review and revise class representative agreement and discuss same with Ms. Ellis	\$550.00	0.4	\$220.00					0.4	\$	220.00	
6/30/2020	Megan Yarnall	Review correspondence from defense counsel regarding: contacts with putative class members	\$550.00	0.2	\$110.00								
6/30/2020	Megan Yarnall	Review discovery dispute meet and confer draft and email from Mr. Umpierre regarding: same	\$550.00	0.3	\$165.00								
7/1/2020	Karen Ellis	Review emails regarding new class representatives and phone conference and e-mails to/from Ms. Yarnall regarding same	\$275.00	0.9	\$247.50					0.9	\$	247.50	
7/1/2020	Karen Ellis	Review proposed deposition schedule	\$275.00	0.4	\$110.00								
7/1/2020	Megan Yarnall	Discuss releases with Ms. Ellis	\$550.00	0.2	\$110.00								
7/1/2020	Megan Yarnall	Discuss witnesses with Ms. Ellis	\$550.00	0.2	\$110.00								
7/1/2020	Megan Yarnall	Draft letter to opposing counsel regarding: resident files of declarants and review correspondence regarding: same	\$550.00	0.5	\$275.00								
7/1/2020	Megan Yarnall	Email Mr. Umpierre regarding: same	\$550.00	0.2	\$110.00								
7/1/2020	Megan Yarnall	Phone call with co-counsel regarding: potential class reps and other issues re: declarant depositions	\$550.00	0.7	\$385.00					0.7	\$	385.00	
7/1/2020	Megan Yarnall	Review declarations and prepare summary spreadsheet of all declarations	\$550.00	3	\$1,650.00								
7/1/2020	Megan Yarnall	Review documents regarding: declarants	\$550.00	0.4	\$220.00								
7/2/2020	Karen Ellis	E-mails to Ms. Yarnall regarding same	\$275.00	0.2	\$55.00					0.2	\$	55.00	
7/2/2020	Karen Ellis	E-mails to/from Ms. Yarnall regarding facility records	\$275.00	0.2	\$55.00								
7/2/2020	Karen Ellis	Prepare requests and authorizations for potential class representatives and declarants	\$275.00	1	\$275.00					1	\$	275.00	
7/2/2020	Karen Ellis	Review court docket regarding status of pleadings, download 2nd amended complaint	\$275.00	0.2	\$55.00								
7/2/2020	Karen Ellis	Review emails regarding obtaining records for potential class reps	\$275.00	0.2	\$55.00					0.2	\$	55.00	
7/2/2020	Karen Ellis	Review Regs	\$275.00	1	\$275.00								
7/2/2020	Karen Ellis	Revise facility records request	\$275.00	0.8	\$220.00								
7/2/2020	Megan Yarnall	Draft deposition prep outline for Ms. Romeo	\$550.00	2	\$1,100.00								
7/2/2020	Megan Yarnall	Draft memo regarding Ms. Romero	\$550.00	0.6	\$330.00								
7/2/2020	Megan Yarnall	Phone conference with Ms. Romeo regarding: upcoming deposition	\$550.00	1	\$550.00								
7/2/2020	Megan Yarnall	Review documents and correspondence with Ms. Romeo	\$550.00	0.4	\$220.00								
7/2/2020	Megan Yarnall	Review transcripts of declarant depositions in Aegis case	\$550.00	1.1	\$605.00								
7/6/2020	Megan Yarnall	Review correspondence regarding: upcoming deponent depositions, read deposition transcripts from previous deponent depositions	\$550.00	3.2	\$1,760.00								
7/7/2020	Karen Ellis	Email Ms. Yarnall regarding same	\$275.00	0.2	\$55.00					0.2	\$	55.00	
7/7/2020	Karen Ellis	E-mails from/to Caroline Romeo regarding vacation schedule and forward to MAY	\$275.00	0.3	\$82.50								
7/7/2020	Karen Ellis	E-mails from/to declarants and potential class representatives regarding additional documents	\$275.00	1.7	\$467.50					1.7	\$	467.50	
7/7/2020	Karen Ellis	Review e-mails regarding deposition schedules	\$275.00	0.2	\$55.00								
7/7/2020	Megan Yarnall	Review correspondence regarding: discovery and upcoming depositions, read deposition transcripts from past depositions and prepare outline for deposition preparation	\$550.00	3.1	\$1,705.00								
7/8/2020	Karen Ellis	Proof and finalize authorizations and releases for facility records	\$275.00	0.9	\$247.50								
7/8/2020	Karen Ellis	Review emails re deposition schedule	\$275.00	0.3	\$82.50								
7/8/2020	Megan Yarnall	Email Mr. Umpierre regarding motion to compel	\$550.00	0.2	\$110.00								

Fees

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						General Hrs	Fees						
7/8/2020	Megan Yarnall	Review and revise draft joint statement regarding: motion to compel class member documents	\$550.00	0.8	\$440.00								
7/8/2020	Megan Yarnall	Review correspondence regarding motion to compel	\$550.00	0.2	\$110.00								
7/9/2020	Karen Ellis	Call Peter Falkenberg	\$275.00	0.2	\$55.00					0.2	\$	55.00	
7/9/2020	Karen Ellis	E-mails from/to Ms. Yarnall regarding contacting declarants regarding available dates	\$275.00	0.2	\$55.00								
7/9/2020	Karen Ellis	Phone call with Temma Roby and Caroline Romeo	\$275.00	1.8	\$495.00								
7/9/2020	Megan Yarnall	Email Ms. Ellis regarding: deponent availability for upcoming deposition dates	\$550.00	0.1	\$55.00								
7/9/2020	Megan Yarnall	Review correspondence regarding: same	\$550.00	0.1	\$55.00								
7/10/2020	Karen Ellis	Attempt to contact Pete Falkenberg regarding phone	\$275.00	0.2	\$55.00					0.2	\$	55.00	
7/10/2020	Karen Ellis	E-mail Mr. Falkenberg	\$275.00	0.3	\$82.50					0.3	\$	82.50	
7/10/2020	Karen Ellis	E-mail Ms. Yarnall regarding deposition availability	\$275.00	0.2	\$55.00								
7/10/2020	Karen Ellis	E-mail Ms. Yarnall regarding location of facility requests and authorizations	\$275.00	0.2	\$55.00								
7/10/2020	Karen Ellis	Phone call with Temma Roby	\$275.00	0.5	\$137.50								
7/10/2020	Megan Yarnall	Email Mr. Umpierre regarding: deponent deposition date availability	\$550.00	0.1	\$55.00								
7/10/2020	Megan Yarnall	Review Judge Early discovery order and requirement for discovery referee	\$550.00	0.1	\$55.00								
7/13/2020	Megan Yarnall	Email Mr. Umpierre regarding Falkenberg and review correspondence regarding: same	\$550.00	0.2	\$110.00					0.2	\$	110.00	
7/13/2020	Megan Yarnall	Call Mr. Falkenberg regarding: deposition availability date	\$550.00	0.3	\$165.00					0.3	\$	165.00	
7/13/2020	Megan Yarnall	Conference call with co-counsel regarding: case status	\$550.00	0.9	\$495.00			0.9	\$	495.00			
7/13/2020	Megan Yarnall	Email co-counsel regarding: class rep deposition preparation outline, review outline regarding: same	\$550.00	0.7	\$385.00					0.7	\$	385.00	
7/14/2020	Megan Yarnall	Review correspondence regarding: discovery, referee, additional class representatives, and mediation	\$550.00	0.3	\$165.00					0.3	\$	165.00	
7/15/2020	Megan Yarnall	Email 4 deponents regarding: records requests and release	\$550.00	0.4	\$220.00								
7/15/2020	Megan Yarnall	Phone conference with Mr. Arora re: deposition availability, email co-counsel regarding: same	\$550.00	0.2	\$110.00								
7/15/2020	Megan Yarnall	Review and respond to correspondence from co-counsel regarding release agreements	\$550.00	0.2	\$110.00								
7/15/2020	Megan Yarnall	Review and revise release agreements for all 6 deponents	\$550.00	0.7	\$385.00								
7/16/2020	Megan Yarnall	Phone conference with Mr. Arora regarding: record request and releases	\$550.00	1	\$550.00								
7/16/2020	Megan Yarnall	Review and reply to correspondence with co-counsel regarding: record releases for all deponents	\$550.00	0.3	\$165.00								
7/16/2020	Megan Yarnall	Review correspondence regarding: discovery dispute	\$550.00	0.2	\$110.00								
7/16/2020	Megan Yarnall	Revise Ms. Roby's release and email her regarding: same	\$550.00	0.4	\$220.00								
7/17/2020	Megan Yarnall	Draft Deposition preparation outline for Temma Roby	\$550.00	1.8	\$990.00								
7/17/2020	Megan Yarnall	Email Mr. Umpierre regarding: record request and releases	\$550.00	0.2	\$110.00								
7/17/2020	Megan Yarnall	Phone conference with Mr. Falkenberg	\$550.00	0.2	\$110.00					0.2	\$	110.00	
7/17/2020	Megan Yarnall	Review and reply to correspondence from co-counsel regarding: arbitration provisions in residency agreements	\$550.00	0.2	\$110.00					0.2	\$	110.00	
7/17/2020	Megan Yarnall	Review correspondence and Email Ms. Warren regarding: review of records regarding: staffing methods	\$550.00	0.2	\$110.00								
7/20/2020	Megan Yarnall	Review correspondence regarding: appointment of discovery master	\$550.00	0.1	\$55.00								
7/20/2020	Megan Yarnall	Review correspondence regarding: Expert witness deposition of Dr. Flores	\$550.00	0.2	\$110.00								
7/20/2020	Megan Yarnall	Review order from Judge Early regarding: discovery dispute and related correspondence	\$550.00	0.1	\$55.00								
7/21/2020	Megan Yarnall	Preparation deposition preparation outline for Temma Roby	\$550.00	0.9	\$495.00								
7/21/2020	Megan Yarnall	Review correspondence regarding: class certification schedule and discovery disputes	\$550.00	0.2	\$110.00								
7/22/2020	Megan Yarnall	Email Co-counsel regarding: deponent record releases	\$550.00	0.2	\$110.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
7/22/2020	Megan Yarnall	Email Mr. Umpierre regarding: exhibits to Yarnall declaration	\$550.00	0.2	\$110.00								
7/22/2020	Megan Yarnall	Review deposition transcripts from declarants and class representatives	\$550.00	1.2	\$660.00								
7/23/2020	Megan Yarnall	Review and reply to correspondence regarding: upcoming deposition dates and deponent availability and record production	\$550.00	0.3	\$165.00								
7/23/2020	Megan Yarnall	Review documents produced by Sunrise regarding: staffing model and public representations regarding: staffing model	\$550.00	2.9	\$1,595.00								
7/24/2020	Megan Yarnall	Email co-counsel regarding: deposition preparation for declarant depositions, deposition schedules	\$550.00	0.2	\$110.00								
7/24/2020	Megan Yarnall	Prepare deposition preparation outline regarding: Temma Roby	\$550.00	1.9	\$1,045.00								
7/24/2020	Megan Yarnall	Review correspondence regarding depo preparation for declarant depositions	\$550.00	0.2	\$110.00								
7/24/2020	Megan Yarnall	Review documents produced by defendants regarding: deponent residency records	\$550.00	0.7	\$385.00								
7/24/2020	Megan Yarnall	Review documents produced by Sunrise regarding: staffing model and public representations regarding: staffing model	\$550.00	1.1	\$605.00								
7/27/2020	Karen Ellis	E-mail Mr. Arora, Mr. Falkenberg, Ms. Roby, and Ms. Romeo forwarding declarations and second amended complaint	\$275.00	0.4	\$110.00							0.4	\$ 110.00
7/27/2020	Karen Ellis	E-mail Ms. Yarnall regarding availability for deposition and deposition prep	\$275.00	0.2	\$55.00								
7/27/2020	Karen Ellis	Phone call with Alan Arora, Peter Falkenberg, Temma Roby, and Caroline Romeo	\$275.00	1.8	\$495.00							1.8	\$ 495.00
7/27/2020	Karen Ellis	Phone call with Ms. Yarnall regarding status	\$275.00	0.2	\$55.00								
7/27/2020	Karen Ellis	Review emails regarding status	\$275.00	0.2	\$55.00								
7/27/2020	Megan Yarnall	Discuss case status with Ms. Ellis	\$550.00	0.2	\$110.00								
7/27/2020	Megan Yarnall	Phone conference with co-counsel re: upcoming declarant deposition prep, prepare for same	\$550.00	1	\$550.00								
7/27/2020	Megan Yarnall	Review and revise deposition preparation outline for Temma Roby	\$550.00	1.6	\$880.00								
7/28/2020	Karen Ellis	Review e-mails regarding depositions	\$275.00	0.4	\$110.00								
7/28/2020	Megan Yarnall	Review correspondence regarding: production of resident files and upcoming deposition preparation	\$550.00	0.2	\$110.00								
7/28/2020	Megan Yarnall	Review documents produced by defendant regarding: statements made regarding staffing models	\$550.00	1.1	\$605.00								
7/29/2020	Karen Ellis	Forward email regarding Pete Falkenberg to Ms. Yarnall	\$275.00	0.2	\$55.00							0.2	\$ 55.00
7/29/2020	Karen Ellis	Phone call with Ms. Yarnall regarding reviewing documents	\$275.00	0.2	\$55.00								
7/29/2020	Karen Ellis	Review e-mails regarding documents produced	\$275.00	0.6	\$165.00								
7/29/2020	Megan Yarnall	Discuss same with Ms. Ellis	\$550.00	0.2	\$110.00								
7/29/2020	Megan Yarnall	Phone conference with co-counsel and Ms. Greenfield regarding: Ms. Greenfield's upcoming deposition	\$550.00	1.7	\$935.00								
7/29/2020	Megan Yarnall	Review resident files related to declarants produced by Sunrise	\$550.00	1.1	\$605.00								
7/30/2020	Karen Ellis	E-mail Ms. Yarnall regarding status of review	\$275.00	0.2	\$55.00								
7/30/2020	Karen Ellis	E-mails to/from Brian Umpierre regarding addition of documents	\$275.00	0.2	\$55.00								
7/30/2020	Karen Ellis	Phone call with Ms. Yarnall regarding same	\$275.00	0.2	\$55.00								
7/30/2020	Karen Ellis	Review Oliveira documents on Relativity	\$275.00	2.4	\$660.00								
7/30/2020	Karen Ellis	Review produced documents on Relativity	\$275.00	0.2	\$55.00								
7/31/2020	Karen Ellis	Emails from/to Ms. Yarnall regarding contacting Christine Romero; phone call with Ms. Romero regarding deposition, deposition prep and Zoom trial; review Oliveira documents on Relativity; prepare recap of review; e-mail Ms. Yarnall regarding same; calendar deposition preparation sessions	\$275.00	6	\$1,650.00								
7/31/2020	Megan Yarnall	Discuss deposition schedule with Ms. Ellis	\$550.00	0.1	\$55.00								
7/31/2020	Megan Yarnall	Email Mr. Umpierre regarding: same	\$550.00	0.1	\$55.00								
7/31/2020	Megan Yarnall	Review email from Ms. Ellis regarding review of Ms. Oliveira's facility records	\$550.00	0.1	\$55.00								
8/3/2020	Karen Ellis	Emails from/to Ms. Yarnall	\$275.00	0.2	\$55.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
8/3/2020	Karen Ellis	Additional scan of documents regarding admission agreement	\$275.00	0.6	\$165.00								
8/3/2020	Karen Ellis	Phone call with Ms. Yarnall	\$275.00	0.2	\$55.00								
8/3/2020	Karen Ellis	Review emails regarding depositions, documents and status	\$275.00	0.2	\$55.00								
8/3/2020	Megan Yarnall	Discuss same with Brian	\$550.00	0.4	\$220.00								
8/3/2020	Megan Yarnall	Discuss with Ms. Ellis	\$550.00	0.2	\$110.00								
8/3/2020	Megan Yarnall	Phone conference with Ms. Romeo	\$550.00	1	\$550.00								
8/3/2020	Megan Yarnall	Review documents produced by defendants re: Ms. Romeo and prepare for Ms. Romeo's deposition	\$550.00	2.9	\$1,595.00								
8/4/2020	Karen Ellis	Email Brian Umpierre regarding Relativity issue	\$275.00	0.2	\$55.00	0.2	\$	55.00					
8/4/2020	Karen Ellis	Phone call with Caroline Romeo regarding not opening exhibit box and time of deposition	\$275.00	0.2	\$55.00								
8/4/2020	Karen Ellis	Review emails regarding depositions and exhibits	\$275.00	0.2	\$55.00								
8/4/2020	Karen Ellis	Review newly produced documents	\$275.00	1	\$275.00								
8/4/2020	Megan Yarnall	Phone conference with Ms. Romeo	\$550.00	0.8	\$440.00								
8/4/2020	Megan Yarnall	Review documents and prepare for Ms. Romeo's deposition and discuss with Mr. Umpierre	\$550.00	3.5	\$1,925.00								
8/5/2020	Karen Ellis	E-mails from/to Ms. Yarnall regarding documents provided to Caroline Romeo	\$275.00	0.4	\$110.00								
8/5/2020	Karen Ellis	Phone call with Ms. Yarnall regarding outcome of deposition and reviewing records for other deponents	\$275.00	0.2	\$55.00								
8/5/2020	Karen Ellis	Review emails regarding deposition report and upcoming depositions	\$275.00	0.4	\$110.00								
8/5/2020	Megan Yarnall	Defend deposition of Ms. Romeo	\$550.00	1.6	\$880.00								
8/5/2020	Megan Yarnall	Draft summary of deposition to co-counsel	\$550.00	2	\$1,100.00								
8/5/2020	Megan Yarnall	Email Ms. Warren regarding: docs produced by Sunrise related to staffing representations	\$550.00	0.2	\$110.00								
8/5/2020	Megan Yarnall	Prepare for deposition	\$550.00	2	\$1,100.00								
8/5/2020	Megan Yarnall	Telephone conference with witness Caroline Romeo regarding: her deposition	\$550.00	1.2	\$660.00								
8/6/2020	Megan Yarnall	Review notes regarding previous phone conference with Ms. Greenfield	\$550.00	1.1	\$605.00								
8/6/2020	Megan Yarnall	Zoom conference with witness Lesley Greenfield in preparation for upcoming deposition	\$550.00	2	\$1,100.00								
8/7/2020	Karen Ellis	Review Karl Falkenberg records on Relativity	\$275.00	2.3	\$632.50					2.3	\$	632.50	
8/11/2020	Megan Yarnall	Review Mr. Umpierre's notes regarding: Greenfield deposition	\$550.00	0.2	\$110.00								
8/12/2020	Karen Ellis	Complete review of Karl Falkenberg records on Relativity	\$275.00	1.1	\$302.50					1.1	\$	302.50	
8/12/2020	Karen Ellis	Phone call with Ms. Yarnall regarding Falkenberg records	\$275.00	0.2	\$55.00					0.2	\$	55.00	
8/12/2020	Karen Ellis	Prepare spreadsheet regarding Falkenberg records	\$275.00	1.1	\$302.50					1.1	\$	302.50	
8/13/2020	Megan Yarnall	Review documents produced by defendants regarding: statements regarding: staffing methods	\$550.00	3.3	\$1,815.00								
8/18/2020	Karen Ellis	Attempts to contact Lynda Lahman and Cathy Ziehl	\$275.00	0.2	\$55.00								
8/18/2020	Karen Ellis	E-mail Ms. Yarnall regarding availability for deposition and deposition preparation	\$275.00	0.2	\$55.00								
8/18/2020	Karen Ellis	Forward releases for signature	\$275.00	0.2	\$55.00								
8/18/2020	Karen Ellis	Forward releases for signature	\$275.00	0.2	\$55.00								
8/18/2020	Karen Ellis	Phone call with Cathy Ziehl	\$275.00	0.6	\$165.00								
8/18/2020	Karen Ellis	Phone call with Ms. Lahman	\$275.00	0.6	\$165.00								
8/18/2020	Karen Ellis	Phone call with Ms. Yarnall regarding status and contacting declarants	\$275.00	0.2	\$55.00								
8/18/2020	Karen Ellis	Review e-mail regarding forwarding records to Mark Johnson	\$275.00	0.2	\$55.00								
8/18/2020	Karen Ellis	Review e-mails between counsel regarding same	\$275.00	0.2	\$55.00								
8/18/2020	Karen Ellis	Save and forward signed releases to Ms. Yarnall with availability for deposition and deposition preparation	\$275.00	0.2	\$55.00								
8/18/2020	Megan Yarnall	Draft records releases	\$550.00	0.9	\$495.00								
8/18/2020	Megan Yarnall	Email and discuss regarding records with Ms. Ellis	\$550.00	0.2	\$110.00								
8/18/2020	Megan Yarnall	Review correspondence regarding: depositions of declarants	\$550.00	0.2	\$110.00								
8/19/2020	Karen Ellis	Attempt to contact Cathy Ziehl regarding same	\$275.00	0.2	\$55.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
8/19/2020	Karen Ellis	E-mails from/to Mr. Johnson re witness documents	\$275.00	0.2	\$55.00								
8/19/2020	Karen Ellis	E-mails to/from Ms. Yarnall regarding status of contacts	\$275.00	0.2	\$55.00								
8/19/2020	Karen Ellis	Forward to Ms. Yarnall and phone call with Ms. Yarnall	\$275.00	0.2	\$55.00								
		Locate documents requested by Mark Johnson re Arora, Falkenberg, and Roby and ShareFile to Mr. Johnson	\$275.00	2.2	\$605.00								
8/19/2020	Karen Ellis	Phone call with Lynda Lahman re deposition and deposition preparation	\$275.00	0.4	\$110.00					2.2	\$	605.00	
8/19/2020	Karen Ellis	Review email from Cathy Ziehl	\$275.00	0.2	\$55.00								
8/19/2020	Karen Ellis	Review email from Ms. Ziehl	\$275.00	0.2	\$55.00								
8/19/2020	Karen Ellis	Review e-mails regarding depositions	\$275.00	0.2	\$55.00								
8/19/2020	Karen Ellis	Revise date of birth on release and e-mail to Ms. Ziehl	\$275.00	0.2	\$55.00								
8/19/2020	Megan Yarnall	Discuss same with Ms. Ellis	\$550.00	0.2	\$110.00								
8/19/2020	Megan Yarnall	Review and reply to correspondence regarding: depositions of declarants	\$550.00	0.7	\$385.00								
8/20/2020	Karen Ellis	Attempt to contact Pete Falkenberg	\$275.00	0.2	\$55.00					0.2	\$	55.00	
8/20/2020	Karen Ellis	Phone call with Alan Arora	\$275.00	1	\$275.00								
8/20/2020	Karen Ellis	Review e-mail from Ms. Yarnall regarding contacting deponents	\$275.00	0.2	\$55.00								
8/20/2020	Karen Ellis	Review e-mails regarding depositions and Cathy Ziehl	\$275.00	0.4	\$110.00								
8/20/2020	Megan Yarnall	Discuss upcoming deposition with Mr. Umpierre	\$550.00	0.2	\$110.00								
8/20/2020	Megan Yarnall	Discuss upcoming depositions with Ms. Ellis	\$550.00	0.2	\$110.00								
8/20/2020	Megan Yarnall	Draft email to Ms. Ziehl regarding: deposition	\$550.00	0.2	\$110.00								
8/20/2020	Megan Yarnall	Draft memo regarding: documents produced by defendants	\$550.00	0.4	\$220.00								
8/20/2020	Megan Yarnall	Email Ms. Ellis regarding: guardians ad litem	\$550.00	0.2	\$110.00								
		Phone conference with Mr. Umpierre and Ms. Stebner regarding: appointing potential class representatives as guardians ad litem	\$550.00	0.4	\$220.00					0.4	\$	220.00	
8/20/2020	Megan Yarnall	Review and revise draft third amended complaint	\$550.00	1.5	\$825.00								
8/20/2020	Megan Yarnall	Review correspondence from Ms. Ziehl	\$550.00	0.2	\$110.00								
8/20/2020	Megan Yarnall	Review draft documents regarding: same	\$550.00	0.2	\$110.00								
8/20/2020	Megan Yarnall	Review draft letter to opposing counsel	\$550.00	0.2	\$110.00								
8/20/2020	Megan Yarnall	Review probate code regarding: incapacity	\$550.00	0.8	\$440.00								
8/21/2020	Karen Ellis	Emails from/to Ms. Yarnall regarding Guardian ad Litem declarations	\$275.00	0.3	\$82.50								
8/21/2020	Karen Ellis	E-mails to/from Lynda Lahman re pre-deposition phone and Zoom calls	\$275.00	0.3	\$82.50								
		Follow up calls to Mr. Falkenberg; forward final signed declarations to Ms. Yarnall	\$275.00	0.3	\$82.50					0.3	\$	82.50	
8/21/2020	Karen Ellis	Forward final declaration to Mr. Arora for signature	\$275.00	0.2	\$55.00								
8/21/2020	Karen Ellis	Forward final declaration to Mr. Falkenberg for signature	\$275.00	0.2	\$55.00					0.2	\$	55.00	
8/21/2020	Karen Ellis	Phone call with Alan Arora regarding information for declaration	\$275.00	1	\$275.00								
8/21/2020	Karen Ellis	Phone call with Ms. Yarnall regarding declarations	\$275.00	0.2	\$55.00								
8/21/2020	Karen Ellis	Phone call with Peter Falkenberg regarding information for declaration	\$275.00	0.7	\$192.50					0.7	\$	192.50	
8/21/2020	Karen Ellis	Review physician's letter from Mr. Arora	\$275.00	0.4	\$110.00								
8/21/2020	Karen Ellis	Revise declaration and forward to Ms. Yarnall	\$275.00	0.8	\$220.00								
8/21/2020	Karen Ellis	Revise declaration and forward to Ms. Yarnall	\$275.00	1.1	\$302.50								
8/21/2020	Megan Yarnall	Call Ms. Ziehl regarding: upcoming deposition	\$550.00	1.1	\$605.00								
8/21/2020	Megan Yarnall	Discuss GAL with Ms. Ellis	\$550.00	0.2	\$110.00								
8/21/2020	Megan Yarnall	Discuss Ziehl with Ms. Ellis	\$550.00	0.3	\$165.00								
8/21/2020	Megan Yarnall	Email co-counsel regarding GAL	\$550.00	0.2	\$110.00								
		Pull and review POA and residency agreements for potential class representatives and email Co-counsel regarding: same	\$550.00	0.8	\$440.00					0.8	\$	440.00	
8/21/2020	Megan Yarnall	Review and reply to correspondence regarding: same	\$550.00	0.2	\$110.00								
8/21/2020	Megan Yarnall	Review and revise GAL docs	\$550.00	1.3	\$715.00								
8/24/2020	Karen Ellis	Emails from Ms. Yarnall regarding depositions and deposition preparation	\$275.00	0.2	\$55.00								
		E-mails from/to Ms. Yarnall regarding reviewing Nancie Phillips documents on Relativity	\$275.00	0.2	\$55.00								
8/24/2020	Karen Ellis	Review documents are prepare summary	\$275.00	4.5	\$1,237.50								

Fees

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						General Hrs	Fees						
8/24/2020	Karen Ellis	Review email from Chris Healey regarding locating additional plaintiff	\$275.00	0.2	\$55.00							0.2	\$ 55.00
8/24/2020	Karen Ellis	Review Ms. Yarnall email to Lynda Lahman regarding deposition preparation	\$275.00	0.2	\$55.00								
8/24/2020	Karen Ellis	Review recaps regarding residents/status	\$275.00	1.1	\$302.50								
8/24/2020	Megan Yarnall	Review correspondence regarding Mz. Ziehl	\$550.00	0.2	\$110.00								
8/24/2020	Megan Yarnall	Call Ms. Ziehl	\$550.00	0.3	\$165.00								
8/24/2020	Megan Yarnall	Cathy Ziehl Phone conference with Mr. Healey and co-counsel regarding:											
8/24/2020	Megan Yarnall	Cathy Ziehl deposition	\$550.00	0.3	\$165.00								
8/24/2020	Megan Yarnall	Discuss Ms. Ziehl with Ms. Ellis	\$550.00	0.2	\$110.00								
8/24/2020	Megan Yarnall	Phone conference with Ms. Ellis regarding Lanham	\$550.00	0.2	\$110.00								
8/24/2020	Megan Yarnall	Phone conference with Ms. Lahman	\$550.00	1.1	\$605.00								
8/24/2020	Megan Yarnall	Prepare for deposition of Lynda Lahman	\$550.00	3.3	\$1,815.00								
8/25/2020	Karen Ellis	Emails from/to Ms. Yarnall regarding texting Cathy Ziehl	\$275.00	0.3	\$82.50								
8/25/2020	Karen Ellis	Prepare and send text to Ms. Ziehl regarding contacting Ms. Yarnall	\$275.00	0.3	\$82.50								
8/25/2020	Karen Ellis	Review master list regarding current residents/status	\$275.00	1.6	\$440.00								
8/25/2020	Megan Yarnall	Phone conference with Ms. Lahman regarding: upcoming deposition	\$550.00	1	\$550.00								
8/25/2020	Megan Yarnall	Prepare for Ms. Lahman's deposition and deposition preparation session	\$550.00	3.1	\$1,705.00								
8/25/2020	Megan Yarnall	Review and reply to correspondence regarding: Ms. Ziehl's deposition, call Ms. Ziehl	\$550.00	0.3	\$165.00								
8/26/2020	Karen Ellis	Attempts to contact Ms. Ziehl	\$275.00	0.3	\$82.50								
8/26/2020	Karen Ellis	Emails to/from Ms. Yarnall regarding Lahman deposition	\$275.00	0.6	\$165.00								
8/26/2020	Karen Ellis	Review numerous emails regarding Cathy Ziehl	\$275.00	0.5	\$137.50								
8/26/2020	Megan Yarnall	Email Ms. Ellis regarding: Ziehl	\$550.00	0.2	\$110.00								
8/26/2020	Megan Yarnall	Email Ms. Ziehl.	\$550.00	0.2	\$110.00								
8/26/2020	Megan Yarnall	Review and reply to correspondence regarding Ziehl deposition	\$550.00	0.2	\$110.00								
8/26/2020	Megan Yarnall	Review documents produced by Sunrise related to Ms. Lahman and prepare for Lahman deposition	\$550.00	3.1	\$1,705.00								
8/27/2020	Karen Ellis	Email from Ms. Romeo regarding no revisions	\$275.00	0.2	\$55.00								
8/27/2020	Karen Ellis	Phone call with Caroline Romeo regarding deposition (2)	\$275.00	0.2	\$55.00								
8/27/2020	Karen Ellis	Review emails between Ms. Ziehl and Ms. Yarnall	\$275.00	0.2	\$55.00								
8/27/2020	Karen Ellis	Save and forward Layman rough deposition transcript to Ms. Yarnall	\$275.00	0.2	\$55.00								
8/27/2020	Karen Ellis	ShareFile deposition to Ms. Romeo	\$275.00	0.2	\$55.00								
8/27/2020	Megan Yarnall	Draft memo regarding: same	\$550.00	1.1	\$605.00								
8/27/2020	Megan Yarnall	Email Ms. Ellis regarding: Romeo deposition transcript	\$550.00	0.2	\$110.00								
8/27/2020	Megan Yarnall	Email Ms. Ziehl regarding: deposition transcript	\$550.00	0.2	\$110.00								
8/27/2020	Megan Yarnall	Prepare for and attend deposition of declarant Lynda Lahman	\$550.00	5.1	\$2,805.00								
8/27/2020	Megan Yarnall	Review and reply to correspondence from co-counsel regarding Ziehl	\$550.00	0.2	\$110.00								
8/27/2020	Megan Yarnall	Review and reply to correspondence regarding: new class representatives	\$550.00	0.2	\$110.00					0.2	\$	110.00	
8/28/2020	Karen Ellis	E-mail Ms. Yarnall regarding Christine Romeo signed deposition transcript	\$275.00	0.2	\$55.00								
8/28/2020	Karen Ellis	E-mails to/from Ms. Yarnall regarding same	\$275.00	0.4	\$110.00								
8/28/2020	Karen Ellis	Phone call with Ms. Yarnall regarding status	\$275.00	0.2	\$55.00								
8/28/2020	Karen Ellis	Review e-mails re depositions	\$275.00	0.2	\$55.00								
8/28/2020	Karen Ellis	review e-mails to/from Cathy Ziehl	\$275.00	0.3	\$82.50								
8/28/2020	Karen Ellis	Review master lists regarding information as to current residents	\$275.00	2.8	\$770.00								
8/28/2020	Megan Yarnall	Discuss and email re Ziehl with Ms. Ellis	\$550.00	0.6	\$330.00								
8/28/2020	Megan Yarnall	Discuss Romeo transcript with Ms. Ellis, email Ms. Ellis regarding: same	\$550.00	0.3	\$165.00								
8/28/2020	Megan Yarnall	Discuss with Ms. Ellis and co-counsel	\$550.00	0.2	\$110.00					0.2	\$	110.00	
8/28/2020	Megan Yarnall	Email Mr. Falkenberg and Mr. Arora regarding: guardian ad litem appointment	\$550.00	0.2	\$110.00					0.2	\$	110.00	
8/28/2020	Megan Yarnall	Email with co-counsel and Ms. Ziehl regarding: deposition subpoena	\$550.00	0.5	\$275.00								
8/28/2020	Megan Yarnall	Review court order regarding GAL appointment	\$550.00	0.2	\$110.00								
8/28/2020	Megan Yarnall	Review declarations and notes regarding: potential New plaintiffs	\$550.00	0.3	\$165.00					0.3	\$	165.00	

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
8/28/2020	Megan Yarnall	Review notes and draft email regarding: Lynda Lahman deposition	\$550.00	1.5	\$825.00								
8/31/2020	Megan Yarnall	Review correspondence regarding: petition to compel arbitration for Falkenberg	\$550.00	0.2	\$110.00					0.2	\$	110.00	
9/1/2020	Karen Ellis	E-mail Ms. Yarnall regarding status of locating current resident	\$275.00	0.2	\$55.00								
9/1/2020	Karen Ellis	E-mails to/from Ms. Yarnall regarding signed transcript declaration for Caroline Romeo	\$275.00	0.2	\$55.00								
9/1/2020	Karen Ellis	Phone call with TSG reporting regarding same	\$275.00	0.6	\$165.00								
9/1/2020	Megan Yarnall	Review correspondence regarding: discovery and arbitration	\$550.00	0.2	\$110.00					0.2	\$	110.00	
9/2/2020	Karen Ellis	E-mails to/from Ms. Yarnall regarding status of locating current resident class representative	\$275.00	0.3	\$82.50					0.3	\$	82.50	
9/2/2020	Karen Ellis	E-mails to/from TSG Reporting forwarding signed deposition transcript regarding Caroline Romeo	\$275.00	0.3	\$82.50								
9/2/2020	Megan Yarnall	Review correspondence regarding: arbitration issues	\$550.00	0.3	\$165.00								
9/2/2020	Megan Yarnall	Review DSS citation data regarding: understaffing and email Mr. Kawamoto regarding: same	\$550.00	2.2	\$1,210.00								
9/3/2020	Karen Ellis	Preparation of summary/recaps for Falkenberg and Aurora docs and e-mail to Ms. Yarnall	\$275.00	2	\$550.00					2	\$	550.00	
9/3/2020	Karen Ellis	Review documents on Relativity regarding Shirley Arora and Hannalore Falkenberg	\$275.00	2.4	\$660.00					2.4	\$	660.00	
9/3/2020	Megan Yarnall	Draft memo regarding: documents produced by defendants	\$550.00	0.3	\$165.00								
9/3/2020	Megan Yarnall	Email Mr. Healey regarding: docs produced by defendants	\$550.00	0.2	\$110.00								
9/3/2020	Megan Yarnall	Review correspondence regarding: motion and case status	\$550.00	0.3	\$165.00					0.3	\$	165.00	
9/3/2020	Megan Yarnall	Review documents produced by defendants	\$550.00	0.9	\$495.00								
9/4/2020	Karen Ellis	Attempt to open documents sent via ShareFile from opposing counsel	\$275.00	0.2	\$55.00								
9/4/2020	Karen Ellis	E-mail Ms. Yarnall regarding same	\$275.00	0.2	\$55.00								
9/4/2020	Karen Ellis	E-mails from/to Ms. Yarnall regarding adding her to docket and downloading pleadings	\$275.00	0.2	\$55.00								
9/4/2020	Karen Ellis	Forward emails to Ms. Yarnall	\$275.00	0.2	\$55.00								
9/4/2020	Karen Ellis	Search Mr. Needham emails and download pleadings	\$275.00	1.8	\$495.00								
9/4/2020	Megan Yarnall	Discuss case status with Ms. Ellis and recent pleadings	\$550.00	0.4	\$220.00								
9/4/2020	Megan Yarnall	Email co-counsel regarding: conversation with Mr. Falkenberg	\$550.00	0.2	\$110.00					0.2	\$	110.00	
9/4/2020	Megan Yarnall	Falkenberg Review correspondence regarding: arbitration issues	\$550.00	0.2	\$110.00					0.8	\$	440.00	
9/4/2020	Megan Yarnall	Phone call with co-counsel regarding: case status and assignments	\$550.00	1	\$550.00				1	\$	550.00		
9/4/2020	Megan Yarnall	Phone conference with Mr. Falkenberg regarding: arbitration issues	\$550.00	0.4	\$220.00					0.4	\$	220.00	
9/9/2020	Karen Ellis	Compare contact lists to declarant names	\$275.00	1.8	\$495.00								
9/9/2020	Karen Ellis	Emails to and from Ms. Yarnall regarding contacting Ms. Lahman	\$275.00	0.2	\$55.00								
9/9/2020	Karen Ellis	Emails to and from Ms. Yarnall regarding Falkenberg arbitration proceeding	\$275.00	0.3	\$82.50								
9/9/2020	Karen Ellis	Emails to and from Ms. Yarnall regarding resident declarations	\$275.00	0.2	\$55.00								
9/9/2020	Karen Ellis	Emails to and from Ms. Zumwalt forwarding Lynda Lahman deposition transcripts	\$275.00	0.4	\$110.00								
9/9/2020	Karen Ellis	Save transcripts to computer	\$275.00	0.3	\$82.50								
9/9/2020	Megan Yarnall	Discuss happy campers with Ms. Ellis	\$550.00	0.2	\$110.00								
9/9/2020	Megan Yarnall	Draft memo regarding happy campers	\$550.00	0.8	\$440.00								
9/9/2020	Megan Yarnall	Review happy camper declarations filed by Sunrise	\$550.00	1.3	\$715.00								
9/9/2020	Megan Yarnall	Review pleadings regarding: motion to compel arbitration regarding: Falkenberg and email Ms. Ellis regarding: same	\$550.00	0.6	\$330.00					0.6	\$	330.00	
9/10/2020	Karen Ellis	Emails to and from Ms. Michaels regarding pleadings delivered via UPS	\$275.00	0.2	\$55.00								
9/10/2020	Megan Yarnall	Review correspondence from co-counsel regarding: happy camper declarations, read declarations	\$550.00	1.6	\$880.00								
9/11/2020	Karen Ellis	Locate and complete form Notice of Appearance and forward to Ms. Yarnall for signature	\$275.00	0.3	\$82.50								
9/11/2020	Karen Ellis	E-mails from/to Ms. Lahman regarding deposition	\$275.00	0.2	\$55.00								
9/11/2020	Karen Ellis	Forward deposition to Ms. Lahman via ShareFile	\$275.00	0.2	\$55.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
9/11/2020	Karen Ellis	Review e-mails regarding privileged documents	\$275.00	0.2	\$55.00								
9/11/2020	Karen Ellis	Telephone conference with Lynda Lahman regarding deposition review (2)	\$275.00	0.3	\$82.50								
9/11/2020	Karen Ellis	Telephone conference with Ms. Yarnall regarding Notice of Appearance	\$275.00	0.2	\$55.00								
9/11/2020	Karen Ellis	Telephone conference with Ms. Yarnall regarding privileged documents	\$275.00	0.2	\$55.00								
9/11/2020	Megan Yarnall	Read opposition to motion for class cert	\$550.00	1.8	\$990.00								
9/11/2020	Megan Yarnall	Review and sign notice of appearance and email Ms. Ellis regarding: same.	\$550.00	0.2	\$110.00								
9/11/2020	Megan Yarnall	Review correspondence regarding: happy camper declarations and production of witness emails	\$550.00	0.3	\$165.00								
9/14/2020	Karen Ellis	Attempts to contact Lucy Valdez at Dentons	\$275.00	0.5	\$137.50								
9/15/2020	Karen Ellis	Forward Lynda Lahman deposition corrections to Ms. Yarnall for approval	\$275.00	0.2	\$55.00								
9/15/2020	Karen Ellis	Review regarding contacts with declarants and non-declarants	\$275.00	1.4	\$385.00								
9/15/2020	Karen Ellis	Telephone conference with Lucy Valdez regarding inclusion on calendar and task items	\$275.00	0.3	\$82.50								
9/15/2020	Karen Ellis	Telephone conference with Ms. Yarnall same	\$275.00	0.2	\$55.00								
9/15/2020	Megan Yarnall	Discuss correspondence with putative class members with Ms. Ellis	\$550.00	0.2	\$110.00								
9/15/2020	Megan Yarnall	Email Mr. Umpierre regarding: correspondence with putative class members	\$550.00	0.2	\$110.00								
9/15/2020	Megan Yarnall	Review happy camper declarations	\$550.00	2.4	\$1,320.00								
9/15/2020	Megan Yarnall	Review Lahman deposition corrections and email Ms. Ellis regarding: same	\$550.00	0.3	\$165.00								
9/16/2020	Karen Ellis	Review emails regarding putative class member documents	\$275.00	0.3	\$82.50								
9/16/2020	Megan Yarnall	Draft memo regarding: same	\$550.00	1	\$550.00								
9/16/2020	Megan Yarnall	Prep for and attend phone conference with co-counsel regarding: upcoming depositions and case status	\$550.00	0.4	\$220.00								
9/16/2020	Megan Yarnall	Review staff declarations filed in support of opposition to motion for class certification	\$550.00	2.3	\$1,265.00								
9/17/2020	Karen Ellis	Emails to and from Ms. Yarnall regarding status of punitive class member documents	\$275.00	0.2	\$55.00								
9/17/2020	Karen Ellis	Forward changes to Lahman deposition to court report	\$275.00	0.2	\$55.00								
9/17/2020	Karen Ellis	Review email from US District Court regarding processed filing submission for Ms. Yarnall	\$275.00	0.2	\$55.00								
9/17/2020	Megan Yarnall	Review staff declarations filed by Sunrise	\$550.00	1.3	\$715.00								
9/18/2020	Karen Ellis	Emails to and from Ms. Yarnall regarding same	\$275.00	0.2	\$55.00								
9/18/2020	Karen Ellis	File Notice of Appearance in US District Court	\$275.00	0.6	\$165.00								
9/18/2020	Karen Ellis	Revise Notice of Appearance	\$275.00	0.6	\$165.00								
9/18/2020	Megan Yarnall	Search docs produced by defendants regarding: declarants used in support of opposition to motion for class certification	\$550.00	0.9	\$495.00								
9/21/2020	Karen Ellis	Download pleadings and save to folder	\$275.00	0.4	\$110.00	0.4	\$	110.00					
9/21/2020	Megan Yarnall	Email Mr. Needham regarding Musoke	\$550.00	0.2	\$110.00								
9/21/2020	Megan Yarnall	Email Ms. Ellis regarding: Musoke	\$550.00	0.2	\$110.00								
9/21/2020	Megan Yarnall	Review correspondence regarding: Mr. Needham taking Musoke deposition	\$550.00	0.2	\$110.00								
9/21/2020	Megan Yarnall	Review related pleadings and Musoke deposition	\$550.00	0.8	\$440.00								
9/22/2020	Megan Yarnall	Review correspondence regarding: AHCA documents and case status	\$550.00	0.2	\$110.00								
9/23/2020	Karen Ellis	Download and organize pleadings	\$275.00	2.5	\$687.50	2.5	\$	687.50					
9/23/2020	Karen Ellis	Email Ms. Yarnall regarding same	\$275.00	0.2	\$55.00								
9/23/2020	Karen Ellis	Phone call with Mr. Needham regarding pleadings	\$275.00	0.3	\$82.50								
9/23/2020	Karen Ellis	Phone call with Ms. Yarnall regarding downloading pleadings from Mr. Needham emails and docket	\$275.00	0.2	\$55.00								
9/23/2020	Megan Yarnall	Phone conference with co-counsel regarding: cases status	\$550.00	0.7	\$385.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
9/23/2020	Megan Yarnall	Review ACHA documents produced by defendants regarding: staffing methodologies and budget requirements	\$550.00	5.3	\$2,915.00								
9/23/2020	Megan Yarnall	Review declarations of sunrise staff members filed in opposition to class certification	\$550.00	0.6	\$330.00								
9/23/2020	Megan Yarnall	Review DSS citation data related to associated facilities	\$550.00	2.8	\$1,540.00								
9/24/2020	Karen Ellis	E-mails from/to Ms. Yarnall regarding witnesses	\$275.00	0.2	\$55.00								
9/24/2020	Karen Ellis	Download additional pleadings from PACER	\$275.00	2.2	\$605.00								
9/24/2020	Karen Ellis	Download current docket report	\$275.00	0.2	\$55.00	0.2	\$	55.00					
9/24/2020	Karen Ellis	E-mails to/from Mr. Needham & Ms. Yarnall regarding Villa Capri	\$275.00	0.3	\$82.50								
9/24/2020	Karen Ellis	Review email from Lori Beth Merrill regarding billing problems with Sunrise Villa Capri	\$275.00	0.2	\$55.00								
9/24/2020	Karen Ellis	Review emails re compiling communications with Falkenberg, Arora, and Roby	\$275.00	0.2	\$55.00						0.2	\$	55.00
9/24/2020	Karen Ellis	Review e-mails re Musoke deposition	\$275.00	0.3	\$82.50								
9/24/2020	Megan Yarnall	Review ACHA documents produced by defendants	\$550.00	3.2	\$1,760.00								
9/24/2020	Megan Yarnall	Review DSS documents related to opp to class certification	\$550.00	3.2	\$1,760.00								
9/24/2020	Megan Yarnall	Review DSS licensing and certification files	\$550.00	3.2	\$1,760.00								
9/24/2020	W. Timothy Needham	Conference call regarding responses to opposition to class certification	\$895.00	0.4	\$358.00								
9/24/2020	W. Timothy Needham	Conference with Ms. Yarnall	\$895.00	1.2	\$1,074.00								
9/24/2020	W. Timothy Needham	Copy to offices and copy multiple deeds to preparation for Musoke deposition	\$895.00	0.6	\$537.00								
9/24/2020	W. Timothy Needham	Review Musoke declaration and related documents	\$895.00	1.8	\$1,611.00								
9/25/2020	Karen Ellis	Email Ms. Merrill regarding scheduling phone conference	\$275.00	0.2	\$55.00								
9/25/2020	Karen Ellis	Locate and copy communications with Pete Falkenberg, Alan Arora, and Temma Roby to folders	\$275.00	3.2	\$880.00						3.2	\$	880.00
9/25/2020	Karen Ellis	Telephone conference with Ms. Yarnall regarding contact from Lori Beth Merrill regarding Villa Capri	\$275.00	0.2	\$55.00								
9/25/2020	Karen Ellis	Telephone conference with Ms. Yarnall regarding putative class member emails	\$275.00	0.2	\$55.00								
9/25/2020	Megan Yarnall	Discuss status of Falkenberg arbitration issue and Musoke deposition with Ms. Ellis	\$550.00	0.2	\$110.00						0.2	\$	110.00
9/25/2020	Megan Yarnall	Draft memo regarding AHCA documents	\$550.00	3.2	\$1,760.00								
9/25/2020	Megan Yarnall	Phone conference with Mr. Foss regarding: potential deposition of defendant declarants and review related documents	\$550.00	0.3	\$165.00								
9/25/2020	Megan Yarnall	Search and review defendant documents regarding: defendant declarants	\$550.00	2	\$1,100.00								
9/28/2020	Megan Yarnall	Draft memo regarding: same	\$550.00	1.9	\$1,045.00								
9/28/2020	Megan Yarnall	Draft memo to Mr. Needham regarding: Musoke	\$550.00	0.7	\$385.00								
9/28/2020	Megan Yarnall	Read Musoke declaration	\$550.00	0.3	\$165.00								
9/28/2020	Megan Yarnall	Review documents produced by defendants regarding: class member declarants	\$550.00	3.9	\$2,145.00								
9/28/2020	Megan Yarnall	Review emails between Ms. Yarnall, Ms. Ellis, and Temma roby, Pete Falkenberg, Alan Arora and email Mr. Johnson and Mr. Umpierre regarding: same	\$550.00	0.7	\$385.00						0.7	\$	385.00
9/29/2020	Karen Ellis	Email Ms. Yarnall regarding status of Falkenberg petition to compel arbitration	\$275.00	0.2	\$55.00								
9/29/2020	Karen Ellis	E-mails from/to Ms. Yarnall and Mr. Needham regarding documents to prepare for deposition	\$275.00	0.6	\$165.00								
9/29/2020	Megan Yarnall	Email Mr. Healey regarding objection to my declaration	\$550.00	0.2	\$110.00								
9/29/2020	Megan Yarnall	Prepare for deposition of Musoke and email Mr. Needham and Ms. Ellis regarding: same	\$550.00	3.1	\$1,705.00								
9/29/2020	Megan Yarnall	Read Objection to my declaration	\$550.00	0.2	\$110.00								
9/29/2020	Megan Yarnall	Review documents produced by defendants related to employee declarants	\$550.00	1	\$550.00								

Fees

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						General Hrs	Fees						
9/30/2020	Karen Ellis	Download documents and save to deposition preparation folder for Mr. Needham	\$275.00	1.5	\$412.50	1.5	\$	412.50					
9/30/2020	Karen Ellis	Email from Ms. Yarnall regarding Falkenberg petition to compel arbitration	\$275.00	0.2	\$55.00								
9/30/2020	Karen Ellis	E-mails from/to Ms. Yarnall and Mr. Needham regarding documents to prepare for deposition and declarant communications	\$275.00	0.3	\$82.50								
9/30/2020	Karen Ellis	E-mails to/from Lucy Valdez regarding additional records/deposition	\$275.00	0.3	\$82.50								
9/30/2020	Karen Ellis	Phone call with Cristina Flores	\$275.00	0.2	\$55.00								
9/30/2020	Karen Ellis	Phone call with Mr. Needham regarding Dr. Flores	\$275.00	0.3	\$82.50								
9/30/2020	Karen Ellis	Save communications with declarants in folders	\$275.00	1.3	\$357.50								
9/30/2020	Karen Ellis	Search for article from Sacramento State University re licensing program analysts for Mr. Needham and attempt to contact Sacramento State University	\$275.00	0.5	\$137.50								
9/30/2020	Karen Ellis	ShareFile Musoke declaration to Christina Flores	\$275.00	0.2	\$55.00								
9/30/2020	Megan Yarnall	Email Ms. Ellis regarding: emails with potential class members/class representatives and Falkenberg arbitration issues and reply to emails regarding: same	\$550.00	0.2	\$110.00					0.2	\$	110.00	
9/30/2020	Megan Yarnall	Prepare for Musoke deposition	\$550.00	1.1	\$605.00								
9/30/2020	W. Timothy Needham	Work on preparation for Musoke deposition	\$895.00	3	\$2,685.00								
10/1/2020	Karen Ellis	Download additional pleadings from docket	\$275.00	3.7	\$1,017.50								
10/1/2020	Karen Ellis	Email Ms. Merrill regarding scheduling phone conference	\$275.00	0.2	\$55.00								
10/1/2020	Karen Ellis	Emails from/to Ms. Yarnall regarding outreaches to putative class	\$275.00	0.4	\$110.00								
10/1/2020	Karen Ellis	Review file regarding outreach to punitive class	\$275.00	0.3	\$82.50								
10/2/2020	Karen Ellis	Email Ms. Yarnall regarding 2017 advertisements	\$275.00	0.3	\$82.50								
10/2/2020	Karen Ellis	Phone call with Ms. Yarnall regarding status of declarant contact information and saving contact information for all putative class members	\$275.00	0.3	\$82.50								
10/2/2020	Karen Ellis	Review 2017 ad folder	\$275.00	2.4	\$660.00								
10/5/2020	Karen Ellis	Download files	\$275.00	0.5	\$137.50	0.5	\$	137.50					
10/5/2020	Karen Ellis	Email Ms. Yarnall regarding communications with putative class members	\$275.00	0.2	\$55.00								
10/5/2020	Karen Ellis	Emails to/from Mr. Needham regarding downloading Zip files from Brian Umpierre	\$275.00	0.2	\$55.00								
10/5/2020	Karen Ellis	E-mails to/from Mr. Umpierre regarding Musoke	\$275.00	0.2	\$55.00								
10/5/2020	Karen Ellis	Locate and save class member communications in folders	\$275.00	2.6	\$715.00								
10/5/2020	Megan Yarnall	Review correspondence with putative class members, email Ms. Ellis regarding: same	\$550.00	2.4	\$1,320.00								
10/5/2020	W. Timothy Needham	Review SEC filings; e-mail Chris	\$895.00	0.8	\$716.00								
10/6/2020	Karen Ellis	E-mails from/to Mr. Needham regarding Musoke deposition preparation	\$275.00	0.2	\$55.00								
10/6/2020	Karen Ellis	E-mails to Ms. Yarnall regarding status of completion	\$275.00	0.2	\$55.00								
10/6/2020	Karen Ellis	Finish locating and saving communications for potential declarants	\$275.00	5.2	\$1,430.00								
10/6/2020	Karen Ellis	Phone call with Ms. Yarnall regarding locating and saving communications with putative class members	\$275.00	0.5	\$137.50								
10/6/2020	Megan Yarnall	Discuss correspondence production with Ms. Ellis	\$550.00	0.5	\$275.00								
10/7/2020	Karen Ellis	E-mails from/to Mr. Needham regarding Musoke deposition preparation	\$275.00	0.3	\$82.50								
10/7/2020	Karen Ellis	E-mails to Ms. Yarnall regarding status of completion	\$275.00	0.3	\$82.50								
10/7/2020	Karen Ellis	Emails to/from Mr. Needham regarding phone call with Cristina Flores	\$275.00	0.3	\$82.50								
10/7/2020	Karen Ellis	Finish locating and saving communications for potential declarants	\$275.00	4.1	\$1,127.50								
10/7/2020	Karen Ellis	Phone call with Ms. Yarnall regarding locating and saving communications with putative class members	\$275.00	0.5	\$137.50								
10/7/2020	Megan Yarnall	Discuss Musoke deposition with Mr. Needham	\$550.00	0.4	\$220.00								
10/7/2020	Megan Yarnall	Discuss status with Ms. Ellis	\$550.00	0.5	\$275.00								
10/7/2020	Megan Yarnall	email co-counsel regarding: adequacy of search for class	\$550.00	0.2	\$110.00								

Fees

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						General Hrs	Fees						
10/7/2020	Megan Yarnall	Email Mr. Needham and co-counsel regarding: upcoming deposition formats	\$550.00	0.2	\$110.00								
10/7/2020	Megan Yarnall	Review documents regarding: same	\$550.00	1.2	\$660.00								
10/7/2020	Megan Yarnall	Review draft declaration	\$550.00	0.2	\$110.00								
10/7/2020	Megan Yarnall	Review notes and correspondence regarding: adequacy of search for class representatives	\$550.00	0.3	\$165.00						0.3	\$	165.00
10/8/2020	Karen Ellis	Locate and save emails from non-declarant putative class members	\$275.00	3.6	\$990.00								
10/8/2020	Karen Ellis	Review emails regarding depositions, etc.	\$275.00	0.2	\$55.00								
10/8/2020	Megan Yarnall	Check email files for all emails with putative class members for discovery purposes, upload all such emails to share with co-counsel	\$550.00	2.4	\$1,320.00								
10/8/2020	Megan Yarnall	Draft declaration in support of reply motion to file third amended complaint	\$550.00	1.7	\$935.00								
10/8/2020	Megan Yarnall	Draft memo to Mr. Needham regarding: Musoke deposition preparation	\$550.00	2.7	\$1,485.00								
10/8/2020	Megan Yarnall	Phone conference with Mr. Wallace	\$550.00	0.4	\$220.00								
10/8/2020	Megan Yarnall	Review and reply to correspondence regarding: motion to file third amended complaint	\$550.00	0.2	\$110.00								
10/8/2020	Megan Yarnall	Review pleadings	\$550.00	0.3	\$165.00								
10/9/2020	Karen Ellis	Emails from/to Ms. Yarnall regarding contacts with putative class members	\$275.00	0.2	\$55.00								
10/9/2020	Karen Ellis	Locate and save emails from Cathy Ziehl and non-declarant putative class members	\$275.00	3.1	\$852.50								
10/9/2020	Karen Ellis	Review emails regarding depositions, etc.	\$275.00	0.2	\$55.00								
10/9/2020	Megan Yarnall	Check email files for all emails with putative class members for discovery purposes, upload all such emails to share with co-counsel	\$550.00	1.1	\$605.00								
10/9/2020	Megan Yarnall	Email Mr. Needham regarding: Musoke deposition	\$550.00	0.2	\$110.00								
10/9/2020	Megan Yarnall	Email Mr. Wallace regarding: declaration in support of reply motion to file third amended complaint	\$550.00	0.2	\$110.00								
10/9/2020	Megan Yarnall	Email Ms. Ellis, Mr. Umpierre, and Mr. Johnson regarding: same	\$550.00	0.2	\$110.00								
10/9/2020	Megan Yarnall	Phone conference with co-counsel regarding preparation for Tom Berry deposition	\$550.00	1.9	\$1,045.00				1.9	\$	1,045.00		
10/9/2020	Megan Yarnall	Prepare documents for Musoke deposition	\$550.00	0.9	\$495.00								
10/9/2020	Megan Yarnall	Prepare list of witnesses and other important figures in Sunrise matter	\$550.00	0.9	\$495.00								
10/9/2020	Megan Yarnall	Review correspondence regarding: Musoke	\$550.00	0.2	\$110.00								
10/9/2020	Megan Yarnall	Review correspondence regarding: Tom Berry	\$550.00	0.2	\$110.00								
10/9/2020	Megan Yarnall	Discuss same with Mr. Needham and email Mr. Needham memo regarding: same	\$550.00	0.3	\$165.00								
10/11/2020	Megan Yarnall	Draft memo to Mr. Arns regarding: witness list	\$550.00	0.5	\$275.00								
10/11/2020	Megan Yarnall	Prepare for Musoke deposition	\$550.00	2	\$1,100.00								
10/11/2020	Megan Yarnall	Review DSS complaints in preparation for Musoke deposition	\$550.00	1.7	\$935.00								
10/12/2020	Megan Yarnall	Review and reply to correspondence regarding: Musoke	\$550.00	0.2	\$110.00								
10/12/2020	Megan Yarnall	Discuss with Mr. Needham	\$550.00	0.3	\$165.00								
10/12/2020	Megan Yarnall	Email Mr. Needham, Ms. Ellis and co-counsel regarding: deposition technical requirements and Ward deposition	\$550.00	0.5	\$275.00								
10/12/2020	Megan Yarnall	Phone conference with co-counsel regarding: Musoke deposition	\$550.00	0.5	\$275.00				0.5	\$	275.00		
10/12/2020	Megan Yarnall	Review correspondence regarding: Ward depo	\$550.00	0.2	\$110.00								
10/12/2020	Megan Yarnall	Review docs produced by defendant regarding: Musoke	\$550.00	0.8	\$440.00								
10/12/2020	Megan Yarnall	Review DSS Documents in preparation for Musoke Deposition	\$550.00	5.5	\$3,025.00								
10/12/2020	W. Timothy Needham	Preparation for Musoke deposition	\$895.00	7.5	\$6,712.50								
10/12/2020	W. Timothy Needham	Telephone conference with co-counsel	\$895.00	0.5	\$447.50				0.5	\$	447.50		
10/13/2020	Karen Ellis	E-mails from/to Southwest Reporting	\$275.00	0.3	\$82.50								
10/13/2020	Karen Ellis	E-mails to/from Mr. Needham & Ms. Yarnall regarding same	\$275.00	0.4	\$110.00								
10/13/2020	Karen Ellis	Forward deposition notice and protocol letter to Southwest Reporting via email	\$275.00	0.2	\$55.00								

Fees

Date	Time Keeper	Task Description	Hourly	Hours	Fee (Rate x Hours)	Lodestar Reductions		CC Confs	Fees	Falkenberg	Fees	Travel	Fees
			Rate	worked		General	Hrs						
		phone call with Barbara at Southwest Reporting to schedule remote reporter, videographer, and videoconferencing	\$275.00	0.3	\$82.50								
10/13/2020	Karen Ellis	Phone call with Mr. Needham regarding deposition exhibits	\$275.00	0.9	\$247.50								
10/13/2020	Karen Ellis	Phone call with Ms. Yarnall	\$275.00	0.3	\$82.50								
10/13/2020	Karen Ellis	Review emails re deposition	\$275.00	0.2	\$55.00								
		Discuss deposition protocol and reporting services with Mr. Needham And Ms. Ellis	\$550.00	0.3	\$165.00								
10/13/2020	Megan Yarnall	Discuss Musoke deposition with Mr. Needham	\$550.00	0.5	\$275.00								
10/13/2020	Megan Yarnall	Email co-counsel and opposing counsel regarding: Musoke	\$550.00	0.2	\$110.00								
10/13/2020	Megan Yarnall	Email Mr. Needham and Ms. Ellis regarding: same	\$550.00	0.2	\$110.00								
10/13/2020	Megan Yarnall	Email Ms. Ellis regarding: Musoke	\$550.00	0.2	\$110.00								
10/13/2020	Megan Yarnall	Prepare for deposition	\$550.00	3	\$1,650.00								
10/13/2020	Megan Yarnall	Review documents for possible deposition exhibits	\$550.00	1.1	\$605.00								
10/14/2020	Karen Ellis	Conference with Mr. Needham regarding Musoke deposition exhibits	\$275.00	0.3	\$82.50								
		E-mails to/from Barbara at Southwest Reporting re deposition start time and status	\$275.00	0.3	\$82.50								
10/14/2020	Karen Ellis	Prepare deposition exhibits	\$275.00	3.2	\$880.00								
10/14/2020	Karen Ellis	Review exhibits with Mr. Needham	\$275.00	0.3	\$82.50								
10/14/2020	Megan Yarnall	Confer with Ms. Ellis regarding: deposition logistics	\$550.00	0.2	\$110.00								
10/14/2020	Megan Yarnall	Discuss Musoke deposition and DSS records with Mr. Needham	\$550.00	0.6	\$330.00								
10/14/2020	Megan Yarnall	Email co-counsel regarding: Musoke	\$550.00	0.2	\$110.00								
		Review proposed deposition exhibits, review communications regarding: deposition, review documents in preparation for deposition	\$550.00	1.2	\$660.00								
10/14/2020	W. Timothy Needham	Prepare Musoke deposition exhibits and review additional Musoke materials	\$895.00	3	\$2,685.00								
		E-mails from/to Barbara at Southwest Reporting and Ms. Yarnall and Mr. Needham regarding Zoom test and including Mr. Needham and Joe Gorman on future emails	\$275.00	0.3	\$82.50								
10/15/2020	Karen Ellis	E-mails to/from Mr. Needham regarding deposition of Edna Musoke	\$275.00	0.3	\$82.50								
10/15/2020	Karen Ellis	E-mails to/from Ms. Yarnall regarding same	\$275.00	0.2	\$55.00								
		Finish locating and copying communications with putative class members to folder	\$275.00	3.9	\$1,072.50								
10/15/2020	Karen Ellis	Forward emails to Mr. Needham	\$275.00	0.2	\$55.00								
		Phone call with Barbara at Southwest Reporting regarding Zoom test and potential exhibits	\$275.00	0.3	\$82.50								
10/15/2020	Karen Ellis	Phone call with Lisa and Barbara at Southwest Reporting (4) regarding Zoom test and timing of speakers	\$275.00	0.8	\$220.00								
10/15/2020	Karen Ellis	Track UPS deliveries of potential exhibits	\$275.00	0.2	\$55.00								
10/15/2020	Megan Yarnall	Email defense counsel regarding: logistics of Musoke deposition	\$550.00	0.2	\$110.00								
10/15/2020	Megan Yarnall	Email Ms. Ellis regarding: Musoke	\$550.00	0.2	\$110.00								
10/15/2020	Megan Yarnall	Email Ms. Ellis regarding: production of putative class member declarations	\$550.00	0.2	\$110.00								
10/15/2020	Megan Yarnall	Phone call with Mr. Needham regarding: Musoke deposition	\$550.00	0.2	\$110.00								
10/15/2020	Megan Yarnall	Review and summarize AHCA records produced by defendant	\$550.00	2.5	\$1,375.00								
10/15/2020	W. Timothy Needham	Preparation in ZOOM pre-deposition; prepare for Musoke deposition	\$895.00	3	\$2,685.00								
10/16/2020	Karen Ellis	Email exhibits to Barbara at Southwest Reporting (2x)	\$275.00	0.4	\$110.00								
10/16/2020	Karen Ellis	E-mails to/from Ms. Yarnall regarding same	\$275.00	0.2	\$55.00								
10/16/2020	Karen Ellis	Final review regarding communications with putative class members	\$275.00	3.4	\$935.00								
		Phone call with Barbara at Southwest Reporting (2) regarding Zoom test, exhibits, exhibit numbering, etc.	\$275.00	0.4	\$110.00								
10/16/2020	Karen Ellis	Phone call with Barbara regarding same	\$275.00	0.2	\$55.00								
10/16/2020	Karen Ellis	Phone call with Mr. Needham and Ms. Yarnall regarding same	\$275.00	0.4	\$110.00								
10/16/2020	Karen Ellis	Review e-mails regarding depositions and forward to Mr. Needham	\$275.00	0.3	\$82.50								
10/16/2020	Megan Yarnall	Email Mr. Needham regarding: musoke deposition	\$550.00	0.3	\$165.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
10/16/2020	Megan Yarnall	Email Mr. Stein regarding: opposition to objection to Yarnall declaration; review correspondence regarding: same	\$550.00	0.8	\$440.00								
10/16/2020	Megan Yarnall	Email potential deposition exhibits to Mr. Needham	\$550.00	0.2	\$110.00								
10/16/2020	Megan Yarnall	Look at investigation documents regarding: Musoke	\$550.00	0.8	\$440.00								
10/16/2020	Megan Yarnall	Prepare for deposition, review deposition exhibits and edit same	\$550.00	2.2	\$1,210.00								
10/16/2020	Megan Yarnall	Read Shroyer declaration	\$550.00	0.5	\$275.00								
10/16/2020	Megan Yarnall	Re-read Musoke declaration and memo regarding: same	\$550.00	0.5	\$275.00								
10/16/2020	Megan Yarnall	Review memo regarding: Ward deposition	\$550.00	0.3	\$165.00								
10/16/2020	Megan Yarnall	Zoom test run with Musoke court reporter	\$550.00	0.4	\$220.00								
10/16/2020	William Stein	Opposition to object to Ms. Yarnall declaration	\$550.00	2.1	\$1,155.00	2.1	\$	1,155.00					
10/17/2020	Megan Yarnall	Read Dr. Flores declaration	\$550.00	0.9	\$495.00								
10/17/2020	Megan Yarnall	Review correspondence regarding: Musoke deposition and email Mr. Needham regarding: same	\$550.00	0.3	\$165.00								
10/18/2020	Megan Yarnall	Review and summarize AHCA documents produced by defendants	\$550.00	1.2	\$660.00								
10/18/2020	W. Timothy Needham	Preparation for Musoke deposition	\$895.00	2	\$1,790.00								
10/19/2020	Karen Ellis	Email Ms. Yarnall re Musoke deposition	\$275.00	0.2	\$55.00								
10/19/2020	Karen Ellis	Emails from/to Southwest Reporting	\$275.00	0.2	\$55.00								
10/19/2020	Karen Ellis	Emails to/from Ms. Yarnall regarding status of deposition	\$275.00	0.2	\$55.00								
10/19/2020	Megan Yarnall	Discuss Musoke with Mr. Needham, Mr. Healey, Mr. Thamer	\$550.00	0.5	\$275.00								
10/19/2020	Megan Yarnall	Draft memo regarding: Musoke to co-counsel	\$550.00	0.3	\$165.00								
10/19/2020	Megan Yarnall	Prepare for and Musoke deposition	\$550.00	6.5	\$3,575.00								
10/19/2020	Megan Yarnall	Review and summarize AHCA documents produced by defendants	\$550.00	1.2	\$660.00								
10/19/2020	W. Timothy Needham	Preparation for Musoke deposition	\$895.00	7.9	\$7,070.50								
10/19/2020	William Stein	Check authorities in opposition to object to plaintiff's declaration	\$550.00	0.5	\$275.00	0.5	\$	275.00					
10/19/2020	William Stein	Opposition to object to Ms. Yarnall declaration	\$550.00	1.5	\$825.00	1.5	\$	825.00					
10/20/2020	Karen Ellis	Emails from Southwest Reporting and to Ms. Yarnall regarding rough draft of Musoke deposition	\$275.00	0.4	\$110.00								
10/20/2020	Karen Ellis	E-mails to/from Ms. Yarnall regarding information for Southwest Reporting	\$275.00	0.4	\$110.00								
10/20/2020	Megan Yarnall	Email court reporter regarding: deposition exhibits and rough transcript as requested	\$550.00	0.1	\$55.00								
10/20/2020	Megan Yarnall	Email rough transcript to co-counsel	\$550.00	0.1	\$55.00								
10/20/2020	Megan Yarnall	Review and summarize AHCA documents produced by defendants	\$550.00	3.1	\$1,705.00								
10/20/2020	Megan Yarnall	Review care coordinator declarations and cross reference with materials produced by defendants and DSS citations	\$550.00	0.6	\$330.00								
10/21/2020	Karen Ellis	Review emails from Southwest Reporting	\$275.00	0.3	\$82.50								
10/21/2020	Megan Yarnall	Discuss case status with Ms. Ellis	\$550.00	0.2	\$110.00								
10/21/2020	Megan Yarnall	Review and summarize AHCA documents produced by defendants	\$550.00	2.5	\$1,375.00								
10/22/2020	Karen Ellis	Download and save pleadings from Zip file	\$275.00	0.4	\$110.00	0.4	\$	110.00					
10/22/2020	Karen Ellis	Prep non-rep letters	\$275.00	1.5	\$412.50								
10/22/2020	Megan Yarnall	Review and summarize AHCA documents produced by defendants	\$550.00	3.2	\$1,760.00								
10/23/2020	Karen Ellis	Review emails regarding status of non-declaration putative class contacts	\$275.00	0.2	\$55.00								
10/23/2020	Karen Ellis	Review emails to/from co-counsel regarding non-declaration putative class contacts	\$275.00	0.3	\$82.50								
10/23/2020	Megan Yarnall	Review Crandall deposition summary	\$550.00	0.2	\$110.00								
10/24/2020	Megan Yarnall	Email to Mr. Umpierre and Mr. Johnson for potential production	\$550.00	0.4	\$220.00								
10/24/2020	Megan Yarnall	Review and summarize AHCA documents produced by defendants	\$550.00	0.9	\$495.00								
10/24/2020	Megan Yarnall	Review batch of correspondence with putative class members	\$550.00	0.8	\$440.00								
10/26/2020	Karen Ellis	Emails to/from Mr. Needham and Ms. Yarnall regarding Kelley deposition	\$275.00	0.5	\$137.50								
10/26/2020	Megan Yarnall	Discuss Upcoming Gayle Kelly deposition with Mr. Needham	\$550.00	0.3	\$165.00								
10/26/2020	Megan Yarnall	Draft memo and email Mr. Needham regarding: same	\$550.00	2.3	\$1,265.00								
10/26/2020	Megan Yarnall	Gather and review documents related to Kelley and Sunrise of Sunnysvale	\$550.00	2.3	\$1,265.00								
10/26/2020	Megan Yarnall	Review and summarize AHCA documents produced by defendants	\$550.00	5.6	\$3,080.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
10/26/2020	W. Timothy Needham	Call Ms. Yarnall about upcoming deposition	\$895.00	0.3	\$268.50								
10/26/2020	W. Timothy Needham	Review and respond to e-mail from Chris about upcoming mediation	\$895.00	0.4	\$358.00								
10/26/2020	W. Timothy Needham	Review Kelly declaration	\$895.00	0.4	\$358.00								
10/27/2020	Karen Ellis	Emails to/from Ms. Yarnall regarding Kelly deposition	\$275.00	0.4	\$110.00								
10/27/2020	Karen Ellis	Emails to/from Southwest Reporting regarding remote reporter, videographer and videoconferencing and other matters	\$275.00	0.4	\$110.00								
10/27/2020	Karen Ellis	Prep documents to Kelly deposition preparation folder for Mr. Needham	\$275.00	0.7	\$192.50								
10/27/2020	Karen Ellis	Review emails regarding deposition preparation	\$275.00	0.3	\$82.50								
10/27/2020	Megan Yarnall	Review correspondence and analysis re: Sunrise expert Crandall and staffing hours at Sunrise facilities	\$550.00	0.2	\$110.00								
10/27/2020	Megan Yarnall	Review draft opposition to objection to Yarnall declaration	\$550.00	0.5	\$275.00								
10/27/2020	Megan Yarnall	Search for documents related to Sunnyvale facility in preparation for Gayle Kelly deposition, review and draft memo regarding: same	\$550.00	0.7	\$385.00								
10/28/2020	Karen Ellis	Emails from/to Southwest Reporting regarding Kelly deposition	\$275.00	0.5	\$137.50								
10/28/2020	Karen Ellis	Review emails from Ms. Yarnall and save additional documents to Kelly deposition prep file	\$275.00	0.5	\$137.50								
10/28/2020	Karen Ellis	Review emails regarding Musoke video deposition download and invoice	\$275.00	0.2	\$55.00								
10/28/2020	Karen Ellis	Review recent pleadings	\$275.00	2	\$550.00								
10/28/2020	Megan Yarnall	Review AHCA documents produced by defendants and draft memo regarding: same	\$550.00	0.9	\$495.00								
10/28/2020	Megan Yarnall	Review documents produced by defendants in preparation for deposition of Gayle Kelly	\$550.00	2.5	\$1,375.00								
10/29/2020	Karen Ellis	Download Musoke video deposition	\$275.00	0.3	\$82.50		0.3	\$	82.50				
10/29/2020	Karen Ellis	Emails to/from Ms. Yarnall regarding payment of Southwest Reporting invoice for Musoke deposition	\$275.00	0.3	\$82.50								
10/29/2020	Karen Ellis	Forward to Ms. Thompson for payment	\$275.00	0.2	\$55.00								
10/29/2020	Karen Ellis	Phone call with Ms. Yarnall regarding Kelly	\$275.00	0.4	\$110.00								
10/29/2020	Karen Ellis	Phone call with Ms. Yarnall regarding status and deposition of Kelly	\$275.00	0.3	\$82.50								
10/29/2020	Karen Ellis	Review emails regarding defense request for hard copy exhibits	\$275.00	0.3	\$82.50								
10/29/2020	Megan Yarnall	Discuss case status and Kelly deposition with Mr. Stein	\$550.00	1	\$550.00								
10/29/2020	Megan Yarnall	Discuss case status and Kelly deposition with Ms. Ellis	\$550.00	0.3	\$165.00								
10/29/2020	Megan Yarnall	Email Mr. Needham and Mr. Umpierre regarding: Kelly deposition	\$550.00	0.3	\$165.00								
10/29/2020	Megan Yarnall	Email Mr. Stein regarding: Kelly	\$550.00	0.3	\$165.00								
10/29/2020	Megan Yarnall	Review AHCA Documents produced by defendants and draft memo regarding: same	\$550.00	1.6	\$880.00								
10/29/2020	William Stein	Meet with Ms. Yarnall, read filings on background, read Gayle Kelley Declaration	\$550.00	1.8	\$990.00		1.8	\$	990.00				
10/30/2020	Karen Ellis	Download pleadings	\$275.00	0.6	\$165.00		0.6	\$	165.00				
10/30/2020	Karen Ellis	Email Southwest Reporting regarding Kelly	\$275.00	0.2	\$55.00								
10/30/2020	Karen Ellis	Emails from/to Ms. Yarnall regarding Relativity contact	\$275.00	0.2	\$55.00								
10/30/2020	Karen Ellis	Emails to/from Ms. Yarnall regarding expedited transcript, etc.	\$275.00	0.3	\$82.50								
10/30/2020	Karen Ellis	Prepare materials for Kelly review file for Mr. Needham	\$275.00	1.5	\$412.50								
10/30/2020	Karen Ellis	Review emails regarding zoom and ipad use for depositions and exhibits	\$275.00	0.2	\$55.00								
10/30/2020	Karen Ellis	Review Ms. Yarnall emails to Joe Gorman regarding exhibits, etc.	\$275.00	0.2	\$55.00								
10/30/2020	Megan Yarnall	Discuss Sunrise case status and documents available on Relativity with Mr. Stein and email Mr. Stein regarding: same	\$550.00	1.2	\$660.00								
10/30/2020	Megan Yarnall	Discuss with Mr. Needham	\$550.00	0.2	\$110.00								
10/30/2020	Megan Yarnall	Discuss with Mr. Needham	\$550.00	1	\$550.00								
10/30/2020	Megan Yarnall	Email co-counsel regarding: Kelly deposition	\$550.00	0.3	\$165.00								
10/30/2020	Megan Yarnall	Email Defense counsel re: deposition exhibits and protocol	\$550.00	0.3	\$165.00								
10/30/2020	Megan Yarnall	Email Mr. Needham regarding: Kelly deposition and send related documents	\$550.00	0.3	\$165.00								
10/30/2020	Megan Yarnall	Review AHCA Documents produced by defendants and draft memo regarding: same	\$550.00	2	\$1,100.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
10/30/2020	William Stein	Meet with Ms. Yarnall regarding: relativity document review software	\$550.00	0.4	\$220.00								
10/30/2020	William Stein	Review memo to Mr. Needham and staffing model docs in prep for Kelley deposition	\$550.00	0.9	\$495.00	0.9	\$	220.00					
10/31/2020	Megan Yarnall	Draft memo regarding: AHCA Documents produced by defendants, email co-counsel regarding: same	\$550.00	3.8	\$2,090.00								
11/2/2020	Karen Ellis	Email from Southwest Reporting regarding expedited transcript	\$275.00	0.2	\$55.00								
11/2/2020	Karen Ellis	Email from/to Mr. Needham regarding locating exhibits to compendium	\$275.00	0.2	\$55.00								
11/2/2020	Karen Ellis	Email Ms. Yarnall and Mr. Needham regarding exhibits	\$275.00	0.2	\$55.00								
11/2/2020	Karen Ellis	Emails from/to Mr. Needham regarding exhibits and sending same to deponent and opposing counsel	\$275.00	0.2	\$55.00								
11/2/2020	Karen Ellis	E-mails to/from Mr. Stein regarding format of Kelly deposition exhibits	\$275.00	0.2	\$55.00								
11/2/2020	Karen Ellis	Emails to/from Ms. Yarnall regarding addresses for exhibits	\$275.00	0.2	\$55.00								
11/2/2020	Karen Ellis	Emails to/from Ms. Yarnall, Lucy Valdez, and Chris Healey regarding next deposition exhibit for Kelly deposition	\$275.00	0.2	\$55.00								
11/2/2020	Karen Ellis	Locate exhibits and forward to Mr. Needham	\$275.00	0.8	\$220.00								
11/2/2020	Karen Ellis	Review and save additional documents for Kelly deposition prep	\$275.00	1.7	\$467.50								
11/2/2020	Karen Ellis	Review emails regarding depositions	\$275.00	0.2	\$55.00								
11/2/2020	Megan Yarnall	Review and respond to correspondence regarding: Kelly Deposition	\$550.00	0.3	\$165.00								
11/2/2020	William Stein	Find and review Sunnyvale Plan of Operations regarding prep for Gayle Kelley deposition.	\$550.00	1.1	\$605.00	1.1	\$	605.00					
11/3/2020	Karen Ellis	Emails from/to Mr. Needham regarding addresses for shipping of Kelly deposition exhibits	\$275.00	0.2	\$55.00								
11/3/2020	Karen Ellis	Emails to/from Chris Healey regarding expedited deposition transcript	\$275.00	0.2	\$55.00								
11/3/2020	Karen Ellis	Emails to/from Southwest Reporting regarding same	\$275.00	0.2	\$55.00								
11/3/2020	Karen Ellis	Prepare deposition exhibits for Kelly deposition	\$275.00	3.5	\$962.50								
11/3/2020	Karen Ellis	Review email regarding address for shipping and forward to Ms. Lower for preparation of overnight labels	\$275.00	0.2	\$55.00								
11/3/2020	Karen Ellis	Review emails regarding Kelly deposition preparation materials	\$275.00	0.2	\$55.00								
11/3/2020	Karen Ellis	Telephone conference with Mr. Needham regarding same	\$275.00	0.3	\$82.50								
11/3/2020	Karen Ellis	Telephone conference with Mr. Needham regarding same	\$275.00	0.2	\$55.00								
11/4/2020	Karen Ellis	Dmail Mr. Needham and Mr. Stein regarding scanned/hard copies of Kelly exhibits and starting exhibit number	\$275.00	0.2	\$55.00								
11/4/2020	Karen Ellis	Emails from/to Dee Przymus regarding notification of rent increase from Sunrise	\$275.00	0.2	\$55.00								
11/4/2020	Karen Ellis	Emails to/from Mr. Needham regarding same	\$275.00	0.4	\$110.00								
11/4/2020	Karen Ellis	Emails to/from Southwest Reporting confirming Zoom information to be sent to all counsel	\$275.00	0.2	\$55.00								
11/4/2020	Karen Ellis	Locate and save additional emails and documents to Kelly deposition prep file	\$275.00	1.8	\$495.00								
11/4/2020	Karen Ellis	Resend Zoom information to Mr. Needham and Mr. Stein	\$275.00	0.2	\$55.00								
11/4/2020	Karen Ellis	Send electronic potential exhibits regarding Kelly deposition to Southwest Reporting	\$275.00	0.2	\$55.00								
11/4/2020	Karen Ellis	Track UPS delivery to exhibits to Kelly deposition	\$275.00	0.2	\$55.00								
11/4/2020	Megan Yarnall	Email Mr. Healey and Mr. Umpierre regarding: opposition to Ms. Yarnall Declaration	\$550.00	0.3	\$165.00								
11/4/2020	Megan Yarnall	Review correspondence regarding: Kelly Deposition	\$550.00	0.2	\$110.00								
11/5/2020	Karen Ellis	Emails from/to Southwest Reporting regarding confirmation	\$275.00	0.3	\$82.50								
11/5/2020	Karen Ellis	Forward Dee Przymus email to Mr. Needham	\$275.00	0.2	\$55.00								
11/5/2020	Karen Ellis	Review pleadings	\$275.00	1.6	\$440.00								
11/5/2020	W. Timothy Needham	Prepare for Kelley deposition	\$895.00	4.9	\$4,385.50								
11/6/2020	Karen Ellis	Calendar receipt of transcript, etc.	\$275.00	0.2	\$55.00								
11/6/2020	Karen Ellis	Emails from/to Southwest Reporting regarding exhibits that were sent via ShareFile on November 4	\$275.00	0.2	\$55.00								
11/6/2020	Karen Ellis	Re-send exhibits to Lisa at Southwest Reporting	\$275.00	0.2	\$55.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
11/6/2020	Karen Ellis	Review Mr. Stein summary of Kelly deposition	\$275.00	1	\$275.00								
11/6/2020	Karen Ellis	Review status prior to deposition	\$275.00	0.8	\$220.00								
11/6/2020	W. Timothy Needham	Take Kelly deposition	\$895.00	3.5	\$3,132.50								
11/6/2020	William Stein	Monitor deposition of Gayle Kelly, summarizing email	\$550.00	3.3	\$1,815.00	3.3	\$	1,815.00					
11/9/2020	Karen Ellis	Download pleadings; review emails	\$275.00	0.8	\$220.00	0.8	\$	220.00					
11/9/2020	William Stein	Edits to Response to Objection to Ms. Yarnall Declaration and email to Brian Umpierre	\$550.00	0.5	\$275.00	0.5	\$	275.00					
11/10/2020	Karen Ellis	Review emails regarding new information availability at facilities and missing assessments	\$275.00	0.3	\$82.50								
11/10/2020	Karen Ellis	Review pleadings	\$275.00	0.6	\$165.00								
11/11/2020	Karen Ellis	Emails to/from Mr. Stein regarding status	\$275.00	0.2	\$55.00								
11/11/2020	Karen Ellis	Review emails regarding depositions, etc.	\$275.00	0.2	\$55.00								
11/11/2020	Karen Ellis	Review pleadings	\$275.00	0.7	\$192.50								
11/11/2020	William Stein	Review DSS reports to prep for Tom Berry deposition	\$550.00	1.5	\$825.00	1.5	\$	825.00					
11/12/2020	Karen Ellis	Review e-mail regarding depositions, etc	\$275.00	0.3	\$82.50								
11/12/2020	William Stein	Review DSS complaints for Berry deposition	\$550.00	1.5	\$825.00	1.5	\$	825.00					
11/13/2020	Karen Ellis	Email Mr. Needham regarding transcripts	\$275.00	0.2	\$55.00								
11/13/2020	Karen Ellis	Emails from/to Lucy Valdez regarding deposition transcript	\$275.00	0.2	\$55.00								
11/13/2020	Karen Ellis	Emails to/from Southwest Reporting regarding status of transcripts	\$275.00	0.2	\$55.00								
11/13/2020	Karen Ellis	Forward Musoke and Kelly deposition transcripts and Musoke exhibits to Lucy Valdez for distribution	\$275.00	0.2	\$55.00								
11/13/2020	Karen Ellis	Review depo documents	\$275.00	2.1	\$577.50								
11/13/2020	Karen Ellis	Save transcripts and exhibits to file	\$275.00	0.3	\$82.50								
11/16/2020	W. Timothy Needham	Call Mr. Stein	\$895.00	0.3	\$268.50								
11/16/2020	W. Timothy Needham	Review deposition	\$895.00	2.4	\$2,148.00								
11/16/2020	W. Timothy Needham	Review multiple emails	\$895.00	0.2	\$179.00								
11/16/2020	William Stein	Review depositions of Musoke and Kelly	\$550.00	2.1	\$1,155.00	2.1	\$	1,155.00					
11/17/2020	Karen Ellis	Download Kelley exhibits and forward to Lucy Valdez	\$275.00	0.2	\$55.00	0.2	\$	55.00					
11/17/2020	Karen Ellis	Emails from/to Mr. Needham regarding Musoke declaration	\$275.00	0.2	\$55.00								
11/17/2020	Karen Ellis	Emails from/to Mr. Stein regarding ACHA awards	\$275.00	0.2	\$55.00								
11/17/2020	Karen Ellis	Emails to/from Mr. Needham regarding ACHA awards	\$275.00	0.2	\$55.00								
11/17/2020	Karen Ellis	Forward invoice from Southwest Reporting to Mr. Needham for approval	\$275.00	0.2	\$55.00								
11/17/2020	Karen Ellis	Locate and forward Musoke declaration to Mr. Needham	\$275.00	0.3	\$82.50								
11/17/2020	Karen Ellis	Search files in prior matter regarding references to AHCA and Bronze awards	\$275.00	3.5	\$962.50								
11/17/2020	William Stein	Organize deposition cites of Gayle Kelly and Edna Musoke	\$550.00	0.3	\$165.00	0.3	\$	165.00					
11/18/2020	Karen Ellis	Review emails	\$275.00	0.2	\$55.00								
11/18/2020	Karen Ellis	Review pleadings	\$275.00	0.2	\$55.00								
11/19/2020	Karen Ellis	Review emails	\$275.00	0.2	\$55.00								
11/19/2020	Karen Ellis	Review pleadings	\$275.00	0.2	\$55.00								
11/20/2020	Karen Ellis	Review emails	\$275.00	0.2	\$55.00								
11/24/2020	Karen Ellis	Review emails regarding filings	\$275.00	0.2	\$55.00								
11/25/2020	Karen Ellis	Download pleadings and review	\$275.00	1.6	\$440.00	1.6	\$	440.00					
11/25/2020	Karen Ellis	Emails from/to Mr. Stein regarding recent filings	\$275.00	0.2	\$55.00								
11/25/2020	Karen Ellis	Emails to/from Lucy Valdez regarding downloading pleadings filed under seal	\$275.00	0.2	\$55.00								
11/29/2020	William Stein	Review class declarations and DSS reports	\$550.00	2.2	\$1,210.00	2.2	\$	1,210.00					
11/30/2020	William Stein	Mediation Brief insert	\$550.00	4.9	\$2,695.00	4.9	\$	2,695.00					
12/1/2020	Megan Yarnall	Emails from/to Lucy Valdez regarding downloading pleadings filed under seal	\$550.00	0.9	\$495.00								
12/1/2020	Megan Yarnall	Emails from/to Ms. Lower regarding hard copies of deposition transcripts and payment of invoice	\$550.00	0.2	\$110.00								
12/1/2020	William Stein	Correspondence with Chris Healy, redline mediation brief	\$550.00	1.3	\$715.00	1.3	\$	715.00					
12/2/2020	Karen Ellis	Download Gayle Kelly video deposition and forward to Lucy Valdez	\$275.00	0.3	\$82.50	0.3	\$	82.50					

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
12/2/2020	Karen Ellis	Download, save, and review confidential filings	\$275.00	1	\$275.00								
12/2/2020	Karen Ellis	Emails to/from Lucy Valdez regarding confidential filings	\$275.00	0.3	\$82.50								
12/2/2020	William Stein	Redline to mediation brief	\$550.00	3.2	\$1,760.00	3.2	\$	1,760.00					
12/3/2020	Karen Ellis	Emails from/to Lucy Valdez regarding requesting video deposition sync from Court Reporter	\$275.00	0.3	\$82.50								
12/7/2020	Karen Ellis	Download and review pleadings	\$275.00	0.5	\$137.50	0.5	\$	137.50					
12/7/2020	Karen Ellis	Email Lucy Valdez requesting copies of confidential pleadings	\$275.00	0.3	\$82.50								
12/7/2020	Karen Ellis	Email Ms. Valdez regarding status of syncing	\$275.00	0.4	\$110.00								
12/7/2020	Karen Ellis	Phone call with Lisa at Southwest Reporting regarding syncing video depositions to transcripts	\$275.00	0.3	\$82.50								
12/7/2020	Karen Ellis	Phone call with Mr. Thamer regarding investigation and phone conference regarding same	\$275.00	0.7	\$192.50								
12/7/2020	Karen Ellis	Review Kelly and Musoke deposition transcripts regarding duration	\$275.00	0.4	\$110.00								
12/8/2020	Karen Ellis	Arrange for payment of Southwest Reporting invoices	\$275.00	0.2	\$55.00								
12/9/2020	Karen Ellis	Download and review pleadings	\$275.00	1	\$275.00	1	\$	275.00					
12/9/2020	Karen Ellis	Emails from/to Lucy Valdez regarding syncing deposition videos/transcripts	\$275.00	0.2	\$55.00								
12/9/2020	Karen Ellis	Emails from/to Ms. Valdez regarding sealed pleadings	\$275.00	0.2	\$55.00								
12/10/2020	Karen Ellis	Download and review pleadings	\$275.00	2.5	\$687.50	2.5	\$	687.50					
12/10/2020	Karen Ellis	Emails from/to team re investigation conference call	\$275.00	0.2	\$55.00								
12/10/2020	Karen Ellis	Phone call with Ms. Yarnall regarding call and status	\$275.00	0.5	\$137.50								
12/10/2020	William Stein	Review Shiferaw and Miconi materials to prep for call	\$550.00	1	\$550.00	1	\$	550.00					
12/11/2020	Karen Ellis	Emails to/from Mr. Stein	\$275.00	0.2	\$55.00								
12/11/2020	Karen Ellis	Prepare for and attend phone conference regarding investigation	\$275.00	2	\$550.00								
12/11/2020	Karen Ellis	Review emails regarding same	\$275.00	0.2	\$55.00								
12/11/2020	Megan Yarnall	Phone conference with co counsel regarding: investigation	\$550.00	0.7	\$385.00								
12/11/2020	William Stein	Call with Bob Cocchia regarding: Scott Brooks	\$550.00	0.7	\$385.00	0.7	\$	385.00					
12/11/2020	William Stein	Call with Scott Brooks	\$550.00	0.7	\$385.00	0.7	\$	385.00					
12/11/2020	William Stein	Draft list of to-dos	\$550.00	0.5	\$275.00	0.5	\$	275.00					
12/11/2020	William Stein	Meeting with Mr. Thamer, Ms. Yarnall, Mr. Needham and Ms. Ellis	\$550.00	0.7	\$385.00	0.7	\$	385.00					
12/11/2020	William Stein	Review DSS complaints for SoCal investigation	\$550.00	2	\$1,100.00	2	\$	1,100.00					
12/13/2020	Megan Yarnall	Email Willie regarding: WACB investigation	\$550.00	0.2	\$110.00								
12/13/2020	Megan Yarnall	Review notes from WCAB investigation in Evergreen case	\$550.00	0.2	\$110.00								
12/14/2020	W. Timothy Needham	Conference call regarding investigation	\$895.00	0.5	\$447.50								
12/14/2020	William Stein	Conference call regarding investigation	\$550.00	0.5	\$275.00	0.5	\$	275.00					
12/14/2020	William Stein	Draft memorandum of scope of investigation to investigator	\$550.00	5.1	\$2,805.00	5.1	\$	2,805.00					
12/14/2020	William Stein	Emails to team	\$550.00	0.4	\$220.00	0.4	\$	220.00					
12/15/2020	Karen Ellis	Emails to/from Mr. Stein regarding status of meeting regarding northern California investigator	\$275.00	0.2	\$55.00								
12/15/2020	Karen Ellis	Review ad responses regarding responses from former employees	\$275.00	0.4	\$110.00								
12/15/2020	Karen Ellis	Review emails regarding investigation status	\$275.00	0.2	\$55.00								
12/15/2020	Karen Ellis	Work on State court docket reviews	\$275.00	2.6	\$715.00								
12/15/2020	William Stein	Schedule call with Kathryn Stebner	\$550.00	0.2	\$110.00	0.2	\$	110.00					
12/15/2020	William Stein	Review Discovery production	\$550.00	4.4	\$2,420.00	4.4	\$	2,420.00					
12/16/2020	Karen Ellis	Email to Mr. Stein regarding zoom conferences with witnesses	\$275.00	0.2	\$55.00								
12/16/2020	Karen Ellis	Forward to Mr. Stein	\$275.00	0.2	\$55.00								
12/16/2020	Karen Ellis	Prepare recap of former employee contacts from 2017 ads	\$275.00	1	\$275.00								
12/16/2020	Karen Ellis	Review emails regarding zoom conferences with witnesses	\$275.00	0.2	\$55.00								
12/16/2020	Karen Ellis	Work on State court docket reviews	\$275.00	1.2	\$330.00								
12/16/2020	William Stein	Discovery review	\$550.00	4	\$2,200.00	4	\$	2,200.00					
12/17/2020	Karen Ellis	Attend Zoom conferences with Cary Scott and Zoom conferences with Stebner team regarding Northern California investigator	\$275.00	0.3	\$82.50								
12/17/2020	Karen Ellis	Emails to/from Mr. Stein regarding searching California Courts regarding corporate entities and PRA requests	\$275.00	0.4	\$110.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
12/17/2020	Karen Ellis	Prepare for Zoom conferences	\$275.00	1	\$275.00								
12/17/2020	Karen Ellis	Review emails from investigative team	\$275.00	0.2	\$55.00								
12/17/2020	Karen Ellis	Search files regarding employee questionnaire	\$275.00	1.9	\$522.50								
12/17/2020	William Stein	Call with Cary Scott	\$550.00	0.3	\$165.00	0.3	\$	165.00					
12/17/2020	William Stein	Call with Stebner firm [draft opening not billed]	\$550.00	0.3	\$165.00	0.3	\$	165.00					
12/17/2020	William Stein	Review docs	\$550.00	6.4	\$3,520.00	6.4	\$	3,520.00					
12/18/2020	Karen Ellis	Email requests to proper entities	\$275.00	0.2	\$55.00								
12/18/2020	Karen Ellis	Emails to/from Mr. Stein regarding PRA requests	\$275.00	0.3	\$82.50								
12/18/2020	Karen Ellis	Forward PRA requests to Ms. Dunham for mailing	\$275.00	0.2	\$55.00								
12/18/2020	Karen Ellis	Review emails and documents from investigation team	\$275.00	0.4	\$110.00								
12/18/2020	Karen Ellis	Review emails regarding investigation	\$275.00	0.2	\$55.00								
12/18/2020	Karen Ellis	Revise and finalize PRA Requests	\$275.00	4	\$1,100.00								
12/18/2020	William Stein	Call with Cary Scott	\$550.00	0.2	\$110.00	0.2	\$	110.00					
12/18/2020	William Stein	Document review	\$550.00	2	\$1,100.00	2	\$	1,100.00					
12/18/2020	William Stein	Emails to team	\$550.00	0.3	\$165.00	0.3	\$	165.00					
12/18/2020	William Stein	Linkedin research	\$550.00	2.5	\$1,375.00	2.5	\$	1,375.00					
12/21/2020	Karen Ellis	Email to/from Kristin Anderson at Cal Osha & Mr. Stein regarding same	\$275.00	0.4	\$110.00								
12/21/2020	Karen Ellis	Emails from/to team regarding index searching	\$275.00	0.2	\$55.00								
12/21/2020	Karen Ellis	Prepare spreadsheet of facilities and addresses for PRA request	\$275.00	3.7	\$1,017.50								
12/21/2020	Karen Ellis	Save documents to files regarding investigation	\$275.00	0.3	\$82.50								
12/21/2020	William Stein	Calls and emails with Cary Scott	\$550.00	0.4	\$220.00	0.4	\$	220.00					
12/21/2020	William Stein	Document review	\$550.00	3.8	\$2,090.00	3.8	\$	2,090.00					
12/21/2020	William Stein	LinkedIn research	\$550.00	2.2	\$1,210.00	2.2	\$	1,210.00					
12/22/2020	Karen Ellis	Download copies of Complaints to file	\$275.00	0.2	\$55.00	0.2	\$	55.00					
12/22/2020	Karen Ellis	Emails from/to Alan Arora regarding status of case	\$275.00	0.2	\$55.00								
12/22/2020	Karen Ellis	Emails from/to Mr. Needham and Mr. Stein regarding limiting timeframe of Complaints	\$275.00	0.3	\$82.50								
12/22/2020	Karen Ellis	Phone call with Ventura County Superior Court regarding process for obtaining records	\$275.00	0.4	\$110.00								
12/22/2020	Karen Ellis	Review emails from team regarding various investigative matters	\$275.00	0.3	\$82.50								
12/22/2020	Karen Ellis	search Riverside County Superior Court website	\$275.00	0.2	\$55.00								
12/22/2020	Karen Ellis	Search San Diego County Superior Court index regarding Complaints regarding Sunrise	\$275.00	3.9	\$1,072.50								
12/22/2020	William Stein	Document Review	\$550.00	0.7	\$385.00	0.7	\$	385.00					
12/22/2020	William Stein	LinkedIn research	\$550.00	0.7	\$385.00	0.7	\$	385.00					
12/23/2020	Karen Ellis	Forwarding billing information to Ms. Thompson for costs of record retrieval	\$275.00	0.2	\$55.00								
12/23/2020	Karen Ellis	Attempts to access Riverside County Superior Court website	\$275.00	0.2	\$55.00								
12/23/2020	Karen Ellis	Download copies of Complaints	\$275.00	0.2	\$55.00	0.2	\$	55.00					
12/23/2020	Karen Ellis	Email Ventura County Superior Court requesting copies of Complaint	\$275.00	0.3	\$82.50								
12/23/2020	Karen Ellis	Search and review Los Angeles County Superior Court regarding Complaints	\$275.00	0.9	\$247.50								
12/23/2020	Karen Ellis	Search Sanislaus County Superior Court, Santa Clara County Superior Court and San Bernardino County Superior Court regarding records for Sunrise	\$275.00	3	\$825.00								
12/23/2020	W. Timothy Needham	Attend conference call	\$895.00	0.5	\$447.50			0.5	\$	447.50			
12/23/2020	W. Timothy Needham	Research corporate structure	\$895.00	1	\$895.00								
12/23/2020	W. Timothy Needham	Research federal cases	\$895.00	1.3	\$1,163.50								
12/23/2020	W. Timothy Needham	Review multiple emails	\$895.00	0.2	\$179.00								
12/23/2020	William Stein	Discovery review	\$550.00	1.2	\$660.00	1.2	\$	660.00					
12/23/2020	William Stein	Email with Cary Scott	\$550.00	0.2	\$110.00	0.2	\$	110.00					
12/23/2020	William Stein	Download, review, and save Orange County Superior Court Complaints regarding Sunrise	\$275.00	2.9	\$797.50	2.9	\$	797.50					

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
12/24/2020	Karen Ellis	Forward billing information to Ms. Thompson for costs of record retrieval	\$275.00	0.2	\$55.00								
12/24/2020	Karen Ellis	Review emails re investigation into other sunrise cases	\$275.00	0.2	\$55.00								
12/24/2020	Karen Ellis	Review list of Counties re sunrise investigation	\$275.00	0.2	\$55.00								
12/24/2020	William Stein	Draft script for witness contacts	\$550.00	1.2	\$660.00	1.2	\$	660.00					
12/28/2020	Karen Ellis	Attend Zoom meeting	\$275.00	0.7	\$192.50								
12/28/2020	Karen Ellis	Review emails and notes regarding prior investigative team meetings	\$275.00	0.5	\$137.50								
12/28/2020	William Stein	Investigation team meeting	\$550.00	0.7	\$385.00	0.7	\$	385.00					
12/29/2020	Karen Ellis	Review emails	\$275.00	0.3	\$82.50								
12/29/2020	William Stein	Call with Cary Scott	\$550.00	0.4	\$220.00	0.4	\$	220.00					
12/30/2020	Karen Ellis	Emails from/to Mr. Stein regarding status of docket searches	\$275.00	0.2	\$55.00								
12/30/2020	Karen Ellis	Phone call with Nicole from the Counsel on Aging regarding status of lawsuit - POA for resident Mary Keith Roberts	\$275.00	0.4	\$110.00								
12/30/2020	Karen Ellis	Research cases on Riverside County website	\$275.00	0.2	\$55.00								
12/30/2020	Karen Ellis	Review additional Counties regarding downloads	\$275.00	1.3	\$357.50								
12/30/2020	Karen Ellis	Review emails re investigation into other sunrise cases	\$275.00	0.2	\$55.00								
12/30/2020	Karen Ellis	Review instructions on obtaining Ventura Complaints	\$275.00	0.3	\$82.50								
12/30/2020	William Stein	Write up memo of Norcal investigation	\$550.00	1.6	\$880.00	1.6	\$	880.00					
12/30/2020	William Stein	Call with Kathryn Stebner, Margo Evashevski, Ann regarding investigation	\$550.00	0.5	\$275.00	0.5	\$	275.00					
12/30/2020	William Stein	Email to Brian Umpierre	\$550.00	0.2	\$110.00	0.2	\$	110.00					
12/30/2020	William Stein	Email to Cary Scott	\$550.00	0.2	\$110.00	0.2	\$	110.00					
12/31/2020	Karen Ellis	Complete payment for Ventura Complaints	\$275.00	0.2	\$55.00								
12/31/2020	Karen Ellis	Email Ventura County Superior Court regarding confirmation of payment and instructions for sending documents	\$275.00	0.6	\$165.00								
12/31/2020	Karen Ellis	Research on other sunrise cases via Riverside County website	\$275.00	0.4	\$110.00								
12/31/2020	William Stein	Document review	\$550.00	4	\$2,200.00	4	\$	2,200.00					
12/31/2020	William Stein	Emails with Brian Umpierre, Margo Evashevski and Ann Donaldson	\$550.00	0.4	\$220.00	0.4	\$	220.00					
1/4/2021	Karen Ellis	Search State Court websites regarding Sunrise Complaints	\$275.00	1.6	\$440.00								
1/5/2021	Karen Ellis	Search State Court websites regarding Sunrise Complaints; Order and download Complaints	\$275.00	3.4	\$935.00								
1/6/2021	Karen Ellis	Search State Court websites regarding Sunrise Complaints; Order and download Complaints	\$275.00	4.8	\$1,320.00								
1/6/2021	William Stein	Call to Lanzone Morgan	\$550.00	0.3	\$165.00	0.3	\$	165.00					
1/6/2021	William Stein	Call to Scott Brooks	\$550.00	0.3	\$165.00	0.3	\$	165.00					
1/6/2021	William Stein	Compile all witness names	\$550.00	2	\$1,100.00	2	\$	1,100.00					
1/6/2021	William Stein	Review state court cases pulled by Karen Ellis	\$550.00	2.8	\$1,540.00	2.8	\$	1,540.00					
1/7/2021	Karen Ellis	Search State Court websites re Sunrise Complaints; Order and download Complaints	\$275.00	1.6	\$440.00								
1/7/2021	Karen Ellis	Telephone conference with Mr. Stein status	\$275.00	0.2	\$55.00								
1/8/2021	Karen Ellis	Review and save reporter's certification for Musoke deposition	\$275.00	0.2	\$55.00								
1/8/2021	Karen Ellis	Review email from putative class member Patricia Cooke	\$275.00	0.2	\$55.00								
1/8/2021	Karen Ellis	Review invoice from Cary Scott	\$275.00	0.2	\$55.00								
1/8/2021	Karen Ellis	Review regarding status of State Court search regarding Sunrise	\$275.00	0.8	\$220.00								
1/8/2021	William Stein	Call with Cary Scott	\$550.00	0.2	\$110.00	0.2	\$	110.00					
1/8/2021	William Stein	Email to investigators	\$550.00	0.2	\$110.00	0.2	\$	110.00					
1/8/2021	William Stein	Review complaints	\$550.00	0.2	\$110.00	0.2	\$	110.00					
1/11/2021	Karen Ellis	Review and save Cary Scott invoice and forward to Chris Healey	\$275.00	0.3	\$82.50								
1/11/2021	Karen Ellis	Review and save court reporter certifications re Musoke deposition and forward to Lucy Valdez	\$275.00	0.2	\$55.00								
1/11/2021	Karen Ellis	Review notes from investigative meetings	\$275.00	0.7	\$192.50								
1/11/2021	William Stein	Emails with Cary Scott	\$550.00	0.2	\$110.00	0.2	\$	110.00					
1/12/2021	Karen Ellis	Review Superior Court indexes re Sunrise cases	\$275.00	0.6	\$165.00								
1/12/2021	William Stein	Review LinkedIn profiles, emails to investigators	\$550.00	0.8	\$440.00	0.8	\$	440.00					
1/13/2021	Karen Ellis	Review regarding status	\$275.00	0.2	\$55.00	0.2	\$	55.00					

Fees

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						General Hrs	Fees						
1/14/2021	William Stein	Call with Matt Zertuche	\$550.00	0.8	\$440.00		0.8	\$	440.00				
1/14/2021	William Stein	Email to Cary Scott	\$550.00	0.3	\$165.00		0.3	\$	165.00				
1/15/2021	Karen Ellis	Review court filings and memos	\$275.00	0.4	\$110.00								
1/15/2021	William Stein	Email to Mr. Needham, Kathryn Stebner, and Mr. Thamer	\$550.00	0.2	\$110.00		0.2	\$	110.00				
1/15/2021	William Stein	Review Sunrise financial disclosures	\$550.00	0.2	\$110.00		0.2	\$	110.00				
1/19/2021	Karen Ellis	Download, review, and save recent court filings	\$275.00	1.2	\$330.00		1.2	\$	330.00				
1/19/2021	Karen Ellis	Review re status of retrieving Complaints regarding Sunrise in State Courts	\$275.00	0.4	\$110.00								
1/19/2021	William Stein	Emails with team	\$550.00	0.2	\$110.00		0.2	\$	110.00				
1/19/2021	William Stein	Review 360IQ report of investigation	\$550.00	0.2	\$110.00		0.2	\$	110.00				
1/20/2021	Karen Ellis	Download, review, and save additional court filings	\$275.00	0.5	\$137.50		0.5	\$	137.50				
1/20/2021	Karen Ellis	Emails to/from Lucy Valdez regarding confidential filings	\$275.00	0.6	\$165.00								
1/20/2021	Karen Ellis	Emails to/from Mr. Stein regarding same	\$275.00	0.2	\$55.00								
1/20/2021	Karen Ellis	Prepare recap of Investigator Cary Scott invoices	\$275.00	0.5	\$137.50								
1/21/2021	Karen Ellis	Download and save court filings	\$275.00	0.3	\$82.50		0.3	\$	82.50				
1/21/2021	Karen Ellis	Emails to/from Lucy Valdez re confidential filings	\$275.00	0.3	\$82.50								
1/22/2021	Karen Ellis	Download and save court filings	\$275.00	0.4	\$110.00		0.4	\$	110.00				
1/22/2021	Karen Ellis	Review regarding status of State Sunrise complaints	\$275.00	0.7	\$192.50								
1/22/2021	William Stein	Call with Mr. Needham	\$550.00	0.3	\$165.00		0.3	\$	165.00				
1/22/2021	William Stein	Email and call with Cary Scott	\$550.00	0.6	\$330.00		0.6	\$	330.00				
1/22/2021	William Stein	Emails with Mr. Thamer	\$550.00	0.2	\$110.00		0.2	\$	110.00				
1/24/2021	W. Timothy Needham	Work on memo regarding possibility of bringing in defendants parent entities	\$895.00	4	\$3,580.00								
1/25/2021	Karen Ellis	Download, review, and save court filings and confidential court filings	\$275.00	1	\$275.00		1	\$	275.00				
1/25/2021	Karen Ellis	Emails to/from Mr. Stein regarding status of State Complaints and following up on Public Records Requests	\$275.00	0.4	\$110.00								
1/25/2021	Karen Ellis	Review and save Complaints from Costa Costa and forward to Mr. Stein	\$275.00	2	\$550.00								
1/25/2021	William Stein	Emails to plaintiff's attorneys of other sunrise cases	\$550.00	0.2	\$110.00		0.2	\$	110.00				
1/25/2021	William Stein	Phone call with Cary Scott	\$550.00	0.4	\$220.00		0.4	\$	220.00				
1/25/2021	William Stein	Phone call with James Urbanic	\$550.00	0.4	\$220.00		0.4	\$	220.00				
1/25/2021	William Stein	Read state court complaints	\$550.00	3.6	\$1,980.00		3.6	\$	1,980.00				
1/26/2021	Karen Ellis	Review emails regarding status of investigation	\$275.00	0.2	\$55.00								
1/26/2021	Karen Ellis	Review status of Public Record Act Requests	\$275.00	0.4	\$110.00								
1/26/2021	William Stein	Call and email with Cary Scott regarding: contacts	\$550.00	0.2	\$110.00		0.2	\$	110.00				
1/26/2021	William Stein	Schedule meeting regarding: investigation	\$550.00	0.2	\$110.00		0.2	\$	110.00				
1/27/2021	Karen Ellis	Review emails	\$275.00	0.3	\$82.50								
1/27/2021	William Stein	Call Janelle Miconi	\$550.00	0.2	\$110.00		0.2	\$	110.00				
1/27/2021	William Stein	Email 360IQ team with new names	\$550.00	0.2	\$110.00		0.2	\$	110.00				
1/27/2021	William Stein	Email to Cary Scott	\$550.00	0.2	\$110.00		0.2	\$	110.00				
1/27/2021	William Stein	Update employee list	\$550.00	0.6	\$330.00		0.6	\$	330.00				
1/28/2021	Karen Ellis	Download and review pleadings	\$275.00	1	\$275.00								
1/28/2021	Karen Ellis	Review emails regarding expert billings	\$275.00	0.4	\$110.00								
1/28/2021	William Stein	Email to J.M.	\$550.00	0.3	\$165.00		0.3	\$	165.00				
1/28/2021	William Stein	Meeting with investigation team	\$550.00	0.5	\$275.00		0.5	\$	275.00				
1/28/2021	William Stein	Prep for Cory Shanahan call	\$550.00	0.7	\$385.00		0.7	\$	385.00				
1/28/2021	William Stein	Review email from 360IQ.	\$550.00	0.2	\$110.00		0.2	\$	110.00				
1/29/2021	Karen Ellis	Download and review pleadings	\$275.00	1.5	\$412.50		1.5	\$	412.50				
1/29/2021	Karen Ellis	Review emails	\$275.00	0.3	\$82.50								
1/29/2021	William Stein	Call to Cory Shanahan	\$550.00	0.4	\$220.00		0.4	\$	220.00				
1/29/2021	William Stein	Memo and email to team	\$550.00	0.7	\$385.00		0.7	\$	385.00				
2/1/2021	Karen Ellis	Review emails	\$275.00	0.2	\$55.00								
2/1/2021	Karen Ellis	Download and review pleadings	\$275.00	0.3	\$82.50		0.3	\$	82.50				
2/1/2021	Karen Ellis	Emails from/to Stefanie Warren re contacting Pete Falkenberg	\$275.00	0.3	\$82.50					0.3	\$	82.50	
2/1/2021	William Stein	Call with Cary Scott	\$550.00	0.2	\$110.00		0.2	\$	110.00				

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
2/1/2021	William Stein	Email to Cary Scott	\$550.00	0.2	\$110.00		0.2	\$	110.00				
2/1/2021	William Stein	Email to Chris Healey	\$550.00	0.2	\$110.00		0.2	\$	110.00				
2/1/2021	William Stein	Email to team re: disclosure of witnesses and witness list	\$550.00	0.2	\$110.00		0.2	\$	110.00				
2/2/2021	Karen Ellis	Phone call with Pete Falkenberg regarding contact from Stefanie Warren and emails to/from Ms. Warren regarding same	\$275.00	0.5	\$137.50						0.5	\$	137.50
2/3/2021	Karen Ellis	Download and review pleadings	\$275.00	0.4	\$110.00		0.4	\$	110.00				
2/3/2021	Karen Ellis	Review emails	\$275.00	0.4	\$110.00								
2/4/2021	Karen Ellis	Email Mr. Stein regarding status	\$275.00	0.2	\$55.00								
2/4/2021	Karen Ellis	Emails to/from Kristian Anderson regarding status of CalOsha request	\$275.00	0.3	\$82.50								
2/4/2021	Karen Ellis	Emails to/from Lucy Valdez regarding confidential filings	\$275.00	0.2	\$55.00								
2/4/2021	Karen Ellis	Forward update requests to Department of Industrial Relations and Division of Worker's Compensation	\$275.00	0.2	\$55.00								
2/4/2021	Karen Ellis	Review regarding status of PRA Requests	\$275.00	0.3	\$82.50								
2/5/2021	Karen Ellis	Download and review pleadings	\$275.00	0.9	\$247.50		0.9	\$	247.50				
2/5/2021	Karen Ellis	Review emails	\$275.00	0.4	\$110.00								
2/8/2021	Karen Ellis	Download and review pleadings	\$275.00	0.4	\$110.00		0.4	\$	110.00				
2/8/2021	Karen Ellis	emails to/from Lucy Valdez re confidential pleadings	\$275.00	0.2	\$55.00								
2/8/2021	Karen Ellis	Review emails	\$275.00	0.2	\$55.00								
2/9/2021	Karen Ellis	Review emails	\$275.00	0.2	\$55.00								
2/9/2021	William Stein	Review opinion denying class certification	\$550.00	0.2	\$110.00		0.2	\$	110.00				
2/10/2021	Karen Ellis	Review emails	\$275.00	0.4	\$110.00								
2/12/2021	Karen Ellis	Download and review pleadings	\$275.00	0.5	\$137.50		0.5	\$	137.50				
2/12/2021	Karen Ellis	Review emails	\$275.00	0.2	\$55.00								
2/16/2021	Karen Ellis	Download and review pleadings	\$275.00	0.2	\$55.00		0.2	\$	55.00				
2/16/2021	Karen Ellis	Emails to/from Lucy Valdez regarding confidential pleadings	\$275.00	0.2	\$55.00								
2/16/2021	Karen Ellis	Review emails	\$275.00	0.2	\$55.00								
2/17/2021	Karen Ellis	Review emails	\$275.00	0.2	\$55.00								
2/18/2021	Karen Ellis	Download and review pleadings	\$275.00	0.3	\$82.50		0.3	\$	82.50				
2/18/2021	Karen Ellis	Review emails	\$275.00	0.2	\$55.00								
2/23/2021	Karen Ellis	Review emails regarding discovery	\$275.00	0.2	\$55.00								
2/24/2021	Karen Ellis	Emails to/from Mr. Stein regarding obtaining documents from the Division of Workers' Compensation and approval of cost	\$275.00	0.2	\$55.00								
2/24/2021	Karen Ellis	Forward documents to Mr. Stein	\$275.00	0.2	\$55.00								
2/24/2021	Karen Ellis	Review and save documents from Division of Occupational Safety & Health to file	\$275.00	0.5	\$137.50								
2/24/2021	Karen Ellis	Review regarding status of PRA requests	\$275.00	0.3	\$82.50								
2/25/2021	Karen Ellis	Download discovery propounded to defendants and pleadings	\$275.00	0.2	\$55.00		0.2	\$	55.00				
2/25/2021	Karen Ellis	Email DWC requesting list of documents available and approving charges	\$275.00	0.3	\$82.50								
2/25/2021	Karen Ellis	Review emails	\$275.00	0.2	\$55.00								
2/25/2021	Karen Ellis	Review regarding status of PRA requests	\$275.00	0.4	\$110.00								
2/26/2021	Karen Ellis	Download and pleadings	\$275.00	0.3	\$82.50		0.3	\$	82.50				
2/26/2021	William Stein	Call with Sarah Canetti	\$550.00	0.3	\$165.00		0.3	\$	165.00				
2/26/2021	William Stein	Calls to Schlieser contacts	\$550.00	0.5	\$275.00		0.5	\$	275.00				
2/26/2021	William Stein	Set up meeting with team	\$550.00	0.2	\$110.00		0.2	\$	110.00				
3/3/2021	Karen Ellis	Download pleadings	\$275.00	0.3	\$82.50		0.3	\$	82.50				
3/3/2021	William Stein	Meeting regarding witnesses	\$550.00	0.7	\$385.00		0.7	\$	385.00				
3/4/2021	Karen Ellis	Email from Mr. Thamer regarding witness information	\$275.00	0.2	\$55.00								
3/4/2021	Karen Ellis	Review contact list	\$275.00	0.4	\$110.00								
3/4/2021	Karen Ellis	Review regarding status of confidential pleadings unable to download	\$275.00	0.2	\$55.00								
3/5/2021	Karen Ellis	Phone call with Mr. Thamer regarding witnesses	\$275.00	0.5	\$137.50								
3/5/2021	Karen Ellis	Review witness list and prior information provided to co-counsel	\$275.00	1.8	\$495.00								
3/8/2021	Karen Ellis	Download pleadings; email Ms. Yarnall regarding witness information requested by Mr. Thamer	\$275.00	1	\$275.00		1	\$	275.00				
3/8/2021	Karen Ellis	Emails to/from Lucy Valdez regarding confidential filings	\$275.00	0.2	\$55.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
3/8/2021	Karen Ellis	Search regarding witness contact information	\$275.00	0.4	\$110.00								
3/9/2021	Karen Ellis	Emails from/to Mr. Thamer	\$275.00	0.2	\$55.00								
3/9/2021	Karen Ellis	Phone call with Mr. Thamer regarding information required for supplemental witness disclosure	\$275.00	0.2	\$55.00								
3/9/2021	Karen Ellis	Prepare first draft of supplemental witness list	\$275.00	2.9	\$797.50								
3/9/2021	Karen Ellis	Review emails regarding witness list	\$275.00	0.2	\$55.00								
3/10/2021	Karen Ellis	Download and review pleadings	\$275.00	0.4	\$110.00	0.4	\$	110.00					
3/10/2021	Karen Ellis	Email list to Mr. Thamer and Ms. Yarnall	\$275.00	0.3	\$82.50								
3/10/2021	Karen Ellis	Finalize first draft of supplemental witness list	\$275.00	3.7	\$1,017.50								
3/10/2021	Karen Ellis	Review emails	\$275.00	0.2	\$55.00								
3/11/2021	Karen Ellis	Emails from/to Ms. Yarnall regarding trial issue list	\$275.00	0.3	\$82.50								
3/11/2021	Karen Ellis	Organize witness and investigative materials and emails	\$275.00	2.6	\$715.00								
3/11/2021	Megan Yarnall	Phone conference with Mr. Stein regarding: status of witness investigation	\$550.00	0.5	\$275.00								
3/11/2021	Megan Yarnall	Review correspondence and documents regarding: case status	\$550.00	2.2	\$1,210.00								
3/11/2021	William Stein	Call with Ms. Yarnall to bring her up to speed on case	\$550.00	0.6	\$330.00	0.6	\$	330.00					
3/11/2021	William Stein	Email to Mr. Thamer regarding: witness interview	\$550.00	0.2	\$110.00	0.2	\$	110.00					
3/12/2021	Karen Ellis	Download and review pleadings	\$275.00	0.4	\$110.00	0.4	\$	110.00					
3/12/2021	Karen Ellis	Phone call with Ms. Yarnall regarding status of witness information	\$275.00	0.5	\$137.50								
3/12/2021	Karen Ellis	Review status of witness information	\$275.00	0.9	\$247.50								
3/12/2021	Megan Yarnall	Discuss case status with Ms. Ellis	\$550.00	0.5	\$275.00								
3/12/2021	Megan Yarnall	Review correspondence	\$550.00	0.2	\$110.00								
3/15/2021	Megan Yarnall	Discuss witness disclosure list with Mr. Thamer and Mr. Stein	\$550.00	0.3	\$165.00								
3/15/2021	Megan Yarnall	Read memos regarding: research and potential witnesses	\$550.00	0.4	\$220.00								
3/15/2021	Megan Yarnall	Review case docket	\$550.00	0.2	\$110.00								
3/15/2021	Megan Yarnall	Review correspondence regarding witness disclosures	\$550.00	0.2	\$110.00								
3/15/2021	William Stein	Call to Mr. Thamer re witness disclosures	\$550.00	0.2	\$110.00	0.2	\$	110.00					
3/15/2021	William Stein	Call with Ms. Yarnall re witness disclosures	\$550.00	0.3	\$165.00	0.3	\$	165.00					
3/16/2021	Karen Ellis	Download pleadings and email Lucy Valdez regarding same	\$275.00	0.4	\$110.00	0.4	\$	110.00					
3/16/2021	Megan Yarnall	Phone call with Mr. Umpierre and Mr. Healey regarding: outstanding discovery motions	\$550.00	0.3	\$165.00								
3/16/2021	Megan Yarnall	Read draft discovery motions	\$550.00	0.4	\$220.00								
3/16/2021	Megan Yarnall	Research regarding: deposition limits	\$550.00	0.6	\$330.00								
3/16/2021	Megan Yarnall	Review draft motion in preparation for call	\$550.00	0.3	\$165.00								
3/17/2021	Karen Ellis	Download pleadings	\$275.00	0.2	\$55.00	0.2	\$	55.00					
3/17/2021	Megan Yarnall	Read motion regarding: additional witnesses	\$550.00	0.5	\$275.00								
3/17/2021	Megan Yarnall	Research regarding: additional witnesses for motion	\$550.00	2.4	\$1,320.00								
3/17/2021	Megan Yarnall	Review correspondence regarding: discovery status	\$550.00	0.2	\$110.00								
3/18/2021	Karen Ellis	Emails to/from Ms. Yarnall regarding status	\$275.00	0.2	\$55.00								
3/18/2021	Megan Yarnall	Discuss with Mr. Needham	\$550.00	0.2	\$110.00								
3/18/2021	Megan Yarnall	Draft and revise motion regarding: deposition limit	\$550.00	1.7	\$935.00								
3/18/2021	Megan Yarnall	Email Mr. Healey and Mr. Umpierre regarding: same	\$550.00	0.3	\$165.00								
3/18/2021	Megan Yarnall	Phone conference with Mr. Needham regarding: RedFox Financial statements	\$550.00	0.2	\$110.00								
3/18/2021	Megan Yarnall	Research issue regarding: expert depositions counting towards 10 deposition limit	\$550.00	1	\$550.00								
3/18/2021	Megan Yarnall	Review Red Fox financial statements	\$550.00	0.6	\$330.00								
3/18/2021	W. Timothy Needham	Forward financial statement to Ms. Yarnall and call Ms. Yarnall	\$895.00	0.4	\$358.00								
3/19/2021	Megan Yarnall	Review Witness disclosure and review and reply to correspondence regarding: same	\$550.00	0.3	\$165.00								
3/19/2021	Megan Yarnall	Search federal cases involving Sunrise as defendant for possible witness information and other useful information	\$550.00	1.8	\$990.00								
3/22/2021	Karen Ellis	Review emails regarding witness disclosure information and review disclosure	\$275.00	0.6	\$165.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
3/22/2021	Megan Yarnall	Email Mr. Stein regarding: witness disclosure	\$550.00	0.2	\$110.00								
3/22/2021	Megan Yarnall	Search federal cases involving Sunrise as defendant for possible witness information and other useful information	\$550.00	1.1	\$605.00								
3/22/2021	William Stein	Email documents on existing case research to Ms. Yarnall	\$550.00	0.2	\$110.00	0.2	\$	110.00					
3/23/2021	Karen Ellis	Email Ms. Yarnall regarding former employee information previously sent to Mr. Stein	\$275.00	0.3	\$82.50								
3/23/2021	Karen Ellis	Review emails regarding supplemental witness disclosure	\$275.00	0.3	\$82.50								
3/23/2021	Megan Yarnall	Research regarding: noticed depositions in excess of 10 without leave of court	\$550.00	1.8	\$990.00								
3/23/2021	Megan Yarnall	Review correspondence regarding: depositions in excess of 10	\$550.00	0.3	\$165.00								
3/23/2021	Megan Yarnall	Search federal cases involving Sunrise as defendant for possible witness information and other useful information	\$550.00	1	\$550.00								
3/23/2021	William Stein	Review witness disclosures	\$550.00	0.2	\$110.00	0.2	\$	110.00					
3/24/2021	Karen Ellis	Download pleadings	\$275.00	0.6	\$165.00	0.6	\$	165.00					
3/24/2021	Megan Yarnall	Research regarding: deposition issue	\$550.00	1.7	\$935.00								
3/24/2021	Megan Yarnall	Search federal cases involving Sunrise as defendant for possible witness information and other useful information	\$550.00	2.4	\$1,320.00								
3/25/2021	Karen Ellis	Download and review pleadings	\$275.00	0.6	\$165.00	0.6	\$	165.00					
3/25/2021	Karen Ellis	Emails from/to Ms. Yarnall regarding status of supplemental disclosures	\$275.00	0.2	\$55.00								
3/25/2021	Karen Ellis	Forward WCB PRA request response to Mr. Stein and Ms. Yarnall	\$275.00	0.6	\$165.00								
3/25/2021	Megan Yarnall	Edit witness list	\$550.00	0.2	\$110.00								
3/25/2021	Megan Yarnall	Email Ms. Ellis, Mr. Healey, Mr. Thamer regarding: witness list and depo limits	\$550.00	0.4	\$220.00								
3/25/2021	Megan Yarnall	Finish research regarding: depo limits	\$550.00	0.2	\$110.00								
3/25/2021	Megan Yarnall	Review and reply to correspondence regarding: deposition limits	\$550.00	0.2	\$110.00								
3/25/2021	Megan Yarnall	Review correspondence regarding Witness list and WCAB information on past employees	\$550.00	0.2	\$110.00								
3/26/2021	Karen Ellis	Download and save discovery responses	\$275.00	0.3	\$82.50	0.3	\$	82.50					
3/30/2021	Karen Ellis	Phone call with Ms. Yarnall regarding revise cse schedule and status of supplemental witness disclosure	\$275.00	0.3	\$82.50								
3/30/2021	Megan Yarnall	Discuss case status, federal case search, and WCAB information with Ms. Ellis	\$550.00	0.2	\$110.00								
4/1/2021	Megan Yarnall	Review data received from WCAB regarding: potential witnesses or other information	\$550.00	0.8	\$440.00								
4/2/2021	Megan Yarnall	Search federal cases involving Sunrise as defendant for possible witness information and other useful information	\$550.00	3.1	\$1,705.00								
4/5/2021	Megan Yarnall	Review correspondence regarding: shortfall analysis data and discovery motions	\$550.00	0.3	\$165.00								
4/5/2021	Megan Yarnall	Search federal cases involving Sunrise as defendant for possible witness information and other useful information	\$550.00	1.2	\$660.00								
4/6/2021	Karen Ellis	Download pleadings	\$275.00	1.3	\$357.50	1.3	\$	357.50					
4/7/2021	Karen Ellis	Download and review pleadings	\$275.00	0.3	\$82.50	0.3	\$	82.50					
4/7/2021	Karen Ellis	Emails from/to regarding Sunrise deadlines	\$275.00	0.3	\$82.50								
4/8/2021	Karen Ellis	Review email from Alan Arora regarding mother's passing	\$275.00	0.2	\$55.00								
4/9/2021	Karen Ellis	Download and review pleadings	\$275.00	0.4	\$110.00	0.4	\$	110.00					
4/9/2021	Karen Ellis	Email Alan Arora regarding mother's passing	\$275.00	0.3	\$82.50								
4/9/2021	Karen Ellis	Review Ms. Yarnall email to Mr. Arora	\$275.00	0.2	\$55.00								
4/12/2021	Megan Yarnall	Read pleadings and correspondence regarding: same	\$550.00	1.5	\$825.00								
4/13/2021	Karen Ellis	Download pleadings	\$275.00	0.8	\$220.00	0.8	\$	220.00					
4/15/2021	Karen Ellis	Review and save meet and confer letter	\$275.00	0.3	\$82.50								
4/15/2021	Karen Ellis	Review voice message from putative class member	\$275.00	0.2	\$55.00								
4/15/2021	Megan Yarnall	Discuss with Ms. Ellis	\$550.00	0.1	\$55.00								
4/15/2021	Megan Yarnall	Review correspondence	\$550.00	0.1	\$55.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
		Review correspondence regarding: witness investigation by Personal injury Cary	\$550.00	0.2	\$110.00								
4/16/2021	Megan Yarnall												
4/19/2021	Megan Yarnall	Review correspondence regarding: Alta Loma Pro-model initial results	\$550.00	0.2	\$110.00								
4/21/2021	Karen Ellis	Downloadand review pleadings	\$275.00	0.4	\$110.00	0.4	\$	110.00					
4/21/2021	Karen Ellis	emails to/from Lucy Valdez regarding confidential filings	\$275.00	0.3	\$82.50								
4/21/2021	Karen Ellis	Phone call with Ms. Yarnall regarding status	\$275.00	0.2	\$55.00								
4/21/2021	Megan Yarnall	Discuss with Ms. Ellis	\$550.00	0.2	\$110.00								
4/21/2021	Megan Yarnall	Email Cary Scott regarding: status of investigations	\$550.00	0.2	\$110.00								
4/26/2021	Megan Yarnall	Review correspondence regarding: case calendar and upcoming dates	\$550.00	0.2	\$110.00								
4/27/2021	Megan Yarnall	Read letter from defense counsel regarding: discovery deadlines	\$550.00	0.2	\$110.00								
4/30/2021	Karen Ellis	Download pleadings	\$275.00	0.5	\$137.50	0.5	\$	137.50					
5/5/2021	Karen Ellis	Phone call with Ms. Yarnall regarding status	\$275.00	0.2	\$55.00								
5/5/2021	Karen Ellis	Review email regarding CLM inspection	\$275.00	0.2	\$55.00								
5/5/2021	Megan Yarnall	Discuss case status with Ms. Ellis	\$550.00	0.2	\$110.00								
5/5/2021	Megan Yarnall	Review correspondence regarding: CLM inspection	\$550.00	0.2	\$110.00								
5/14/2021	Megan Yarnall	Review correspondence regarding: settlement discussions	\$550.00	0.2	\$110.00								
		Review correspondence regarding: status of settlement discussions and conclusion of mediation on 5/28	\$550.00	0.2	\$110.00								
6/1/2021	Megan Yarnall												
6/2/2021	Megan Yarnall	Phone conference with co-counsel regarding: case status and to-do items	\$550.00	1	\$550.00								
6/3/2021	Karen Ellis	Download pleading	\$275.00	0.2	\$55.00	0.2	\$	55.00					
		E-mails to/from Mx. M regarding contact information for person that contacted her	\$275.00	0.2	\$55.00								
6/16/2021	Karen Ellis												
6/16/2021	Karen Ellis	E-mails to/from Ms. Yarnall regarding Mx. M	\$275.00	0.4	\$110.00								
		Telephone conference with Mx. M regarding contact from defense and mother's residency at Sunrise Burlingame	\$275.00	1	\$275.00								
6/16/2021	Karen Ellis												
6/16/2021	Karen Ellis	Telephone conference with Ms. Yarnall	\$275.00	0.2	\$55.00								
		Review and reply to correspondence regarding expert costs and potential witness	\$550.00	0.4	\$220.00								
6/16/2021	Megan Yarnall												
		Review e-mails regarding contact from Ms. Mesa and e-mails from/to Ms. Yarnall regarding same	\$275.00	0.7	\$192.50								
6/17/2021	Karen Ellis												
6/17/2021	Megan Yarnall	Reply to correspondence regarding potential witness declaration (Theresa) and e-mail Ms. Ellis regarding same	\$550.00	0.3	\$165.00								
		Telephone conference with Mr. Healey regarding potential witness Theresa and Olean case	\$550.00	0.2	\$110.00								
6/17/2021	Megan Yarnall												
6/18/2021	Karen Ellis	Attempts to contact Ms. Mesa via telephone and e-mail	\$275.00	0.2	\$55.00								
		Telephone conference with Ms. Mesa regarding telephone conference with Ms. Yarnall	\$275.00	0.2	\$55.00								
6/18/2021	Karen Ellis												
6/18/2021	Megan Yarnall	E-mail Mr. Healey regarding Olean	\$550.00	0.2	\$110.00								
		Review 9th circuit docket regarding status of en banc review of Olean decision and 9th circuit rules regarding timing of decision	\$550.00	1.5	\$825.00								
6/18/2021	Megan Yarnall												
6/18/2021	Megan Yarnall	Review correspondence regarding Olean	\$550.00	0.2	\$110.00								
6/22/2021	Karen Ellis	Attend telephone conference with Ms. Yarnall and Ms. Mesa	\$275.00	0.9	\$247.50								
6/22/2021	Karen Ellis	Review notes regarding prior telephone conference with Mr. Mesa	\$275.00	0.3	\$82.50								
6/22/2021	Karen Ellis	Telephone conference with Ms. Yarnall following call	\$275.00	0.4	\$110.00								
6/22/2021	Megan Yarnall	Check status on 9th circuit docket	\$550.00	0.5	\$275.00								
6/22/2021	Megan Yarnall	Read Olean decision and other citing decisions	\$550.00	1.4	\$770.00								
6/23/2021	Megan Yarnall	Discuss same with Ms. Ellis	\$550.00	0.4	\$220.00								
6/23/2021	Megan Yarnall	Draft memo regarding same	\$550.00	0.3	\$165.00								
6/23/2021	Megan Yarnall	Telephone conference with Ms. Mesa, potential witness	\$550.00	0.9	\$495.00								
6/25/2021	Karen Ellis	Draft Declaration of Ms. Mesa	\$275.00	1	\$275.00								
6/25/2021	Karen Ellis	Review notes regarding telephone conversations with Ms. Mesa	\$275.00	0.4	\$110.00								
6/25/2021	Megan Yarnall	Check status of Olean case in 9th circuit regarding potential en banc review	\$550.00	0.2	\$110.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
6/25/2021	Megan Yarnall	Reply to Mr. Healy's e-mail regarding witness disclosure and possible declaration from Ms. Mesa	\$550.00	0.2	\$110.00								
6/28/2021	Karen Ellis	Download and review numerous pleadings	\$275.00	1.8	\$495.00	1.8	\$	495.00					
6/28/2021	Karen Ellis	E-mail Ms. Mesa regarding search for documents	\$275.00	0.3	\$82.50								
6/28/2021	Karen Ellis	E-mails from/to Ms. Yarnall regarding same	\$275.00	0.3	\$82.50								
6/28/2021	Megan Yarnall	E-mail exchange with Ms. Ellis regarding Ms. Mesa's declaration	\$550.00	0.2	\$110.00								
6/29/2021	Karen Ellis	Attempt to contact Ms. Mesa by telephone	\$275.00	0.2	\$55.00								
6/29/2021	Karen Ellis	Telephone conference with Ms. Yarnall regarding status	\$275.00	0.4	\$110.00								
6/29/2021	Megan Yarnall	Read defendant's opposition to motion for class certification and accompanying declarations	\$550.00	3.5	\$1,925.00								
6/29/2021	Megan Yarnall	Telephone conference with co-counsel regarding reply to opposition to motion for class certification	\$550.00	1.1	\$605.00								
6/30/2021	Karen Ellis	Attempt to contact Ms. Mesa by telephone	\$275.00	0.2	\$55.00								
6/30/2021	Karen Ellis	Compare names on ad list and Belaire call list to defendants' list of declarations	\$275.00	3.2	\$880.00								
6/30/2021	Karen Ellis	E-mails to/from Ms. Yarnall regarding same	\$275.00	0.2	\$55.00								
6/30/2021	Megan Yarnall	Review Happy Camper declarations	\$550.00	1.9	\$1,045.00								
6/30/2021	Megan Yarnall	Telephone conference with Mr. Umpierre regarding responding and objecting to happy camper declarations filed by defendant	\$550.00	0.8	\$440.00								
7/1/2021	Karen Ellis	Assemble list of current residents	\$275.00	3.9	\$1,072.50								
7/1/2021	Karen Ellis	E-mails from/to Ms. Yarnall regarding comparing names of residents to our contacts	\$275.00	0.3	\$82.50								
7/1/2021	Karen Ellis	Locate and scan notes regarding curren resident witnesses	\$275.00	0.4	\$110.00								
7/1/2021	Megan Yarnall	Read and summarize Happy Camper declarations	\$550.00	6.7	\$3,685.00								
7/1/2021	Megan Yarnall	Search for names of unnamed residents	\$550.00	2.1	\$1,155.00								
7/1/2021	William Stein	Research on declaration requirements in federal court	\$550.00	1.2	\$660.00	1.2	\$	660.00					
7/2/2021	Karen Ellis	Compare Ms. Yarnall's spreadsheet of residents listed on \034Happy Camper\034 declarations to our list of contacts and e-mail Ms. Yarnall regarding same	\$275.00	3.8	\$1,045.00								
7/2/2021	Megan Yarnall	Discuss response to Happy Camper declarations and further investigation with Mr. Umpierre	\$550.00	0.2	\$110.00								
7/2/2021	Megan Yarnall	Review correspondence regarding happy campers	\$550.00	0.2	\$110.00								
7/2/2021	Megan Yarnall	Review data from Happy Camper declarations and e-mail Mr. Umpierre summary of data	\$550.00	1.9	\$1,045.00								
7/6/2021	Karen Ellis	Conference with Ms. Yarnall regarding status	\$275.00	0.2	\$55.00								
7/6/2021	Megan Yarnall	Draft outline of argument to counter them and review correspondence regarding same	\$550.00	3	\$1,650.00								
7/6/2021	Megan Yarnall	Review Happy Camper declarations	\$550.00	0.4	\$220.00								
7/7/2021	Karen Ellis	Attempt to contact Ms. Mesa by phone and e-mail	\$275.00	0.3	\$82.50								
7/7/2021	Karen Ellis	E-mails to/from Ms. Yarnall regarding Mesa and other witnesses	\$275.00	0.3	\$82.50								
7/7/2021	Karen Ellis	Review notes regarding calls from current residents	\$275.00	1.7	\$467.50								
7/7/2021	Karen Ellis	Revise spreadsheet to reflect summary of call	\$275.00	0.3	\$82.50								
7/7/2021	Megan Yarnall	Check status of Olean en banc decision	\$550.00	0.2	\$110.00								
7/7/2021	Megan Yarnall	Draft outline of points for evidentiary objection to Happy Camper declarations	\$550.00	3.3	\$1,815.00								
7/7/2021	Megan Yarnall	E-mail Mr. Foss regarding Happy Camper declarations	\$550.00	0.3	\$165.00								
7/7/2021	Megan Yarnall	Review defendant's objections to certain evidence filed by plaintiff in support of amended motion for class certification and e-mail Mr. Healey regarding same	\$550.00	0.3	\$165.00								
7/7/2021	Megan Yarnall	Review Happy Camper declarations	\$550.00	0.3	\$165.00								
7/7/2021	Megan Yarnall	Review revisions and e-mail Mr. Umpierre regarding happy camper objections	\$550.00	0.6	\$330.00								
7/8/2021	Karen Ellis	Telephone conference with Ms. Yarnall regarding status	\$275.00	0.5	\$137.50								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
7/8/2021	Megan Yarnall	Review and update list of complaints and deficiency citations from DSS website to compare to Happy Camper declarations and search for understaffing related deficiencies	\$550.00	2.1	\$1,155.00								
7/9/2021	Megan Yarnall	Review and update list of complaints and deficiency citations from DSS website to compare to Happy Camper declarations and search for understaffing related deficiencies	\$550.00	2.6	\$1,430.00								
7/12/2021	Karen Ellis	E-mails from/to Mx. PC regarding phone conference	\$275.00	0.2	\$55.00								
7/12/2021	Karen Ellis	E-mails to/from Ms. Yarnall regarding same	\$275.00	0.2	\$55.00								
7/12/2021	Karen Ellis	Locate and review notes regarding prior telephone conference with Mx. PC	\$275.00	0.2	\$55.00								
7/12/2021	Karen Ellis	Telephone conference with Mx. PC and e-mails to/from Mx. PC	\$275.00	0.2	\$55.00								
7/12/2021	Megan Yarnall	Discuss same with Mr. Umpierre and Ms. Ellis	\$550.00	0.4	\$220.00								
7/12/2021	Megan Yarnall	Draft and revise evidentiary objection	\$550.00	6.8	\$3,740.00								
7/12/2021	Megan Yarnall	Review and reply to correspondence regarding evidentiary objections and happy campers	\$550.00	0.2	\$110.00								
7/12/2021	Megan Yarnall	Review correspondence regarding potential witness Mx. PC	\$550.00	0.2	\$110.00								
7/12/2021	Megan Yarnall	Review declarations submitted by Sunrise	\$550.00	0.5	\$275.00								
7/13/2021	Megan Yarnall	Draft and revise motion regarding evidentiary objections	\$550.00	1	\$550.00								
7/13/2021	Megan Yarnall	Review and respond to correspondence regarding evidentiary objections	\$550.00	0.3	\$165.00								
7/13/2021	Megan Yarnall	Review DSS citations regarding understaffing and related Happy Camper declarations to include in motion	\$550.00	2	\$1,100.00								
7/14/2021	Karen Ellis	Attempt to contact Ms. Mesa	\$275.00	0.2	\$55.00								
7/14/2021	Karen Ellis	E-mail Ms. Yarnall regarding same	\$275.00	0.2	\$55.00								
7/14/2021	Karen Ellis	Lengthy telephone conference with Mx. PC regarding intake for declaration	\$275.00	1.8	\$495.00								
7/14/2021	Karen Ellis	Review document provided by Mx. PC in preparation for telephone conference with Mx. PC	\$275.00	0.4	\$110.00								
7/14/2021	Megan Yarnall	E-mail Mr. Healy regarding main deficiencies of Happy Camper declarations	\$550.00	0.3	\$165.00								
7/14/2021	Megan Yarnall	E-mail Mr. Umpierre and Mr. Healey regarding happy camper inconsistencies	\$550.00	0.3	\$165.00								
7/14/2021	Megan Yarnall	Review and revise evidentiary objection pleading, add portion regarding Sali case	\$550.00	0.9	\$495.00								
7/14/2021	Megan Yarnall	Review Happy Camper declarations made by actual residents for any inconsistencies	\$550.00	0.9	\$495.00								
7/15/2021	Karen Ellis	Briefly review documents from Mx. PC	\$275.00	0.4	\$110.00								
7/15/2021	Karen Ellis	E-mails to/from Mx. PC forwarding documents regarding Sunrise	\$275.00	0.4	\$110.00								
7/15/2021	Megan Yarnall	Check status of Olean En Banc decision	\$550.00	0.2	\$110.00								
7/15/2021	Megan Yarnall	Sunrise review and revise evidentiary objection pleading and e-mail Mr. Umpierre and Mr. Healy regarding same	\$550.00	3.1	\$1,705.00								
7/16/2021	Karen Ellis	Download and review pleadings	\$275.00	0.6	\$165.00	0.6	\$	165.00					
7/16/2021	Karen Ellis	E-mails to/from Mx. PC regarding documents received	\$275.00	0.4	\$110.00								
7/16/2021	Karen Ellis	Review documents from Mx. PC	\$275.00	0.4	\$110.00								
7/16/2021	Megan Yarnall	Review and finalize evidentiary objection motion and e-mail to Mr. Umpierre regarding same	\$550.00	0.9	\$495.00								
7/26/2021	Megan Yarnall	Review and reply to correspondence regarding witness disclosure	\$550.00	0.2	\$110.00								
7/27/2021	Karen Ellis	Download pleadings	\$275.00	0.2	\$55.00	0.2	\$	55.00					
7/27/2021	Karen Ellis	E-mails to/from Mx. PC	\$275.00	0.6	\$165.00								
7/27/2021	Megan Yarnall	Review and reply to correspondence with client regarding revised agreement and bylaws	\$550.00	0.2	\$110.00								
7/27/2021	Megan Yarnall	Review federal cases against Sunrise and associated complaints dockets for potential witnesses	\$550.00	0.9	\$495.00								
7/28/2021	Karen Ellis	Review e-mails from Mx. PC	\$275.00	0.4	\$110.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
7/28/2021	Megan Yarnall	Review federal cases against Sunrise and associated complaints docket for potential witnesses	\$550.00	4.6	\$2,530.00								
7/28/2021	Megan Yarnall	Revise witness disclosure and e-mail Mr. Healey regarding same	\$550.00	0.5	\$275.00								
7/30/2021	Karen Ellis	Download and review pleadings	\$275.00	1	\$275.00		1 \$		275.00				
7/30/2021	Karen Ellis	E-mail from/to Mx. PC regarding status	\$275.00	0.3	\$82.50								
7/30/2021	Karen Ellis	E-mail Ms. Yarnall regarding status and inquiry regarding declaration	\$275.00	0.2	\$55.00								
7/30/2021	Karen Ellis	E-mails from/to Mx. PC regarding moving mother out of Sunrise	\$275.00	0.3	\$82.50								
7/30/2021	Karen Ellis	Forward Mx. PC e-mail regarding change of ownership and Brookfield purchase to Ms. Yarnall	\$275.00	0.3	\$82.50								
7/30/2021	Karen Ellis	Save e-mails and documents received from Mx. PC	\$275.00	0.3	\$82.50								
8/2/2021	Karen Ellis	Forward e-mail regarding moving mother out of Sunrise to Ms. Yarnall	\$275.00	0.2	\$55.00								
8/2/2021	Karen Ellis	Review e-mails from Mx. PC	\$275.00	0.7	\$192.50								
8/3/2021	Megan Yarnall	Review Olean decision regarding en banc revie and e-mail correspondence regarding same	\$550.00	0.2	\$110.00								
8/6/2021	Megan Yarnall	Discuss correspondence from putative class member Mx. PC with Ms. Ellis	\$550.00	0.2	\$110.00								
8/9/2021	Karen Ellis	E-mails to/from Mx. PC regarding telephone conference	\$275.00	0.6	\$165.00								
8/9/2021	Karen Ellis	Save additional Mx. PC e-mails and documents	\$275.00	0.2	\$55.00								
8/10/2021	Karen Ellis	Final review and organization of e-mails and documents regarding Mx. PC Telephone conference with Mx. PC regarding status and mother's residency at Sunrise	\$275.00	0.3	\$82.50								
8/10/2021	Karen Ellis	Download recent pleadings	\$275.00	0.5	\$137.50								
8/13/2021	Karen Ellis	Review and reply to correspondence regarding potential impact of protective order in Aegis case	\$275.00	0.4	\$110.00		0.4 \$		110.00				
8/13/2021	Megan Yarnall	Research regarding confidentiality issues related to expert relying on information produced in Aegis case	\$550.00	0.3	\$165.00								
8/16/2021	Karen Ellis	Download Order and forward to Ms. Yarnall	\$275.00	0.2	\$55.00		0.2 \$		55.00				
8/17/2021	Megan Yarnall	Research regarding confidentiality issues related to expert relying on information produced in Aegis case	\$550.00	0.3	\$165.00								
8/18/2021	Karen Ellis	Download pleadings (Motion for Class Cert, etc.)	\$275.00	1.4	\$385.00		1.4 \$		385.00				
8/19/2021	Karen Ellis	Download and review pleadings filed under seal sent by Ms. Valdez	\$275.00	0.5	\$137.50		0.5 \$		137.50				
8/19/2021	Karen Ellis	Telephone conference with Mx. LR regarding father's residency at Sunrise Valentia	\$275.00	1.3	\$357.50								
8/23/2021	Megan Yarnall	Research regarding confidentiality issues related to Experts relying on Aegis data	\$550.00	1	\$550.00								
8/23/2021	Megan Yarnall	Review correspondence regarding briefing schedule and class certified arguments	\$550.00	0.2	\$110.00								
8/24/2021	Karen Ellis	Download and review numerous pleadings	\$275.00	0.9	\$247.50		0.9 \$		247.50				
8/24/2021	Karen Ellis	Telephone conference with Ms. Yarnall regarding contact from class member	\$275.00	0.2	\$55.00								
8/24/2021	Megan Yarnall	Discuss status with Ms. Ellis	\$550.00	0.2	\$110.00								
8/26/2021	Karen Ellis	Review e-mails regarding proof of non-service and telephone conference with Ms. Yarnall regarding same	\$275.00	0.3	\$82.50								
8/26/2021	Megan Yarnall	Discuss evidence of poor care with Ms. Ellis	\$550.00	0.2	\$110.00								
8/26/2021	Megan Yarnall	Review file and deposition transcripts regarding documents produced by sunrise evidencing poor care and e-mail Mr. Umpierre regarding same in preparation for class certification hearing	\$550.00	0.6	\$330.00								
8/31/2021	Megan Yarnall	Review and reply to correspondence regarding class certification hearing and discuss same with Ms. Ellis	\$550.00	0.2	\$110.00								
9/7/2021	Megan Yarnall	Phone conference with Mr. Healey re: research for expert reliance on items subject to protective order	\$550.00	0.2	\$110.00								
9/8/2021	Megan Yarnall	Research regarding expert witness and potential violation of protective order and discuss same with Mr. Stein	\$550.00	1.2	\$660.00								
9/8/2021	Megan Yarnall	Review and reply to correspondence regarding potential violation of protective order	\$550.00	0.3	\$165.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
9/8/2021	William Stein	Research on effect of stipulated protective order on future expert testimony relying on protected material	\$550.00	2.1	\$1,155.00	2.1	\$ 1,155.00						
9/13/2021	Karen Ellis	Download pleadings	\$275.00	0.3	\$82.50	0.3	\$ 82.50						
9/13/2021	Megan Yarnall	Review correspondence re: protective order research	\$550.00	0.2	\$110.00								
9/14/2021	Megan Yarnall	Review correspondence	\$550.00	0.2	\$110.00								
9/20/2021	Megan Yarnall	Review and reply to correspondence re: Olean	\$550.00	0.2	\$110.00								
9/20/2021	Megan Yarnall	Review status of Olean en banc case	\$550.00	0.2	\$110.00								
9/21/2021	Megan Yarnall	Review email from Mr. Healey re: facility capacity and rooms, search files re: same and email Mr. Healey re: same	\$550.00	0.2	\$110.00								
9/22/2021	Megan Yarnall	Check status of Olean Argument and email Mr. Healey re: same	\$550.00	0.2	\$110.00								
9/22/2021	Megan Yarnall	Review Draft Opposition to Motion to strike Shroyer declaration and email Mr. Healey re: same	\$550.00	0.6	\$330.00								
9/27/2021	Karen Ellis	Download pleadings	\$275.00	0.8	\$220.00	0.8	\$ 220.00						
10/8/2021	Karen Ellis	Update pleadings	\$275.00	0.6	\$165.00								
11/1/2021	Karen Ellis	Conference with Ms. Yarnall regarding status	\$275.00	0.2	\$55.00								
11/5/2021	Karen Ellis	Download pleadings	\$275.00	0.5	\$137.50	0.5	\$ 137.50						
11/16/2021	Karen Ellis	Conference with Ms. Yarnall regarding ruling on Motion For Class Certification and status	\$275.00	0.3	\$82.50								
11/16/2021	Megan Yarnall	Read order granting class certification and discuss same with Ms. Ellis	\$550.00	0.7	\$385.00								
11/16/2021	Megan Yarnall	Review correspondence from co-counsel regarding: class certification	\$550.00	0.3	\$165.00								
11/17/2021	Karen Ellis	Review ruling regarding motion for class certification and discuss with Ms. Yarnall	\$275.00	0.8	\$220.00								
11/19/2021	Megan Yarnall	Research regarding: removing under seal designation from documents after class certification granted and email Mr. Healey regarding: same.	\$550.00	3.1	\$1,705.00								
11/22/2021	Karen Ellis	Review case calendar forwarded from Ms. Yarnall	\$275.00	0.2	\$55.00								
11/23/2021	Megan Yarnall	Review correspondence regarding outstanding discovery and case schedule	\$550.00	0.2	\$110.00								
11/29/2021	Megan Yarnall	Read draft response to sunrise request to seal and check research and citations and email Mr. Healey regarding: same.	\$550.00	0.7	\$385.00								
11/30/2021	Karen Ellis	Conference with Ms. Yarnall regarding status	\$275.00	0.2	\$55.00								
11/30/2021	Karen Ellis	E-mails to/from Mx. PC regarding status and referral	\$275.00	0.2	\$55.00								
11/30/2021	Karen Ellis	Review e-mail from Ms. Yarnall to Mr. Umpierre regarding Mx. PC	\$275.00	0.2	\$55.00								
11/30/2021	Megan Yarnall	Conference with Ms. Ellis regarding class member Mx. PC and email Mr. Umpierre regarding: same.	\$550.00	0.3	\$165.00								
12/1/2021	Karen Ellis	Review e-mail forwarded from Ms. Zumwalt regarding recent filing	\$275.00	0.2	\$55.00								
12/2/2021	Karen Ellis	Download and review pleadings	\$275.00	0.2	\$55.00	0.2	\$ 55.00						
12/2/2021	Karen Ellis	E-mails from/to Ms. Lower regarding pleadings received via overnight delivery	\$275.00	0.3	\$82.50								
12/3/2021	Karen Ellis	E-mails to/from Ms. Yarnall regarding status of referral for Mx. PC	\$275.00	0.2	\$55.00								
12/6/2021	Karen Ellis	E-mails from/to Ms. Yarnall regarding Mx. PC	\$275.00	0.2	\$55.00								
12/8/2021	Karen Ellis	E-mails to/from Mx. PC	\$275.00	0.3	\$82.50								
12/13/2021	Karen Ellis	Download pleadings	\$275.00	0.6	\$165.00	0.6	\$ 165.00						
12/13/2021	Megan Yarnall	Review and reply to correspondence regarding communication with Bel Aire contacts and class members and obtaining class list	\$550.00	0.3	\$165.00								
12/14/2021	Karen Ellis	Conference with Ms. Yarnall regarding status	\$275.00	0.3	\$82.50								
12/15/2021	Karen Ellis	Review e-mails	\$275.00	0.3	\$82.50								
12/20/2021	Karen Ellis	Download pleadings	\$275.00	0.4	\$110.00	0.4	\$ 110.00						
12/20/2021	Karen Ellis	E-mails from/to Mr. Thamer, Ms. Yarnall and Mr. Stein	\$275.00	0.5	\$137.50								
12/20/2021	Megan Yarnall	Conference with Mr. Stein and Mr. Thamer regarding witness search	\$550.00	0.3	\$165.00								
12/20/2021	Megan Yarnall	Review file regarding: witness search	\$550.00	0.7	\$385.00								
12/20/2021	William Stein	Call with Michael Thamer and Megan Yarnall regarding: investigation restarting.	\$550.00	0.5	\$275.00	0.5	\$ 275.00						
12/21/2021	Karen Ellis	Download and review pleadings	\$275.00	1.5	\$412.50	1.5	\$ 412.50						
12/21/2021	Karen Ellis	E-mails from/to Mr. Thamer and Mr. Healey	\$275.00	0.4	\$110.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
12/21/2021	Karen Ellis	Review e-mails regarding status of Class Notice	\$275.00	0.2	\$55.00								
		Telephone call with Ms. Yarnall regarding status of fielding calls from Class Notice											
12/21/2021	Karen Ellis	Conference with Ms. Ellis regarding status of case and witness search.	\$275.00	0.5	\$137.50								
12/21/2021	Megan Yarnall	Attend Zoom meeting	\$550.00	0.5	\$275.00								
12/22/2021	Karen Ellis	E-mails from/to Ms. Yarnall regarding class size and mailings	\$275.00	0.5	\$137.50								
12/22/2021	Karen Ellis	Prepare for Zoom meeting with Ms. Yarnall and Mr. Stein	\$275.00	0.2	\$55.00								
12/22/2021	Karen Ellis	Review prior State Court searches	\$275.00	0.5	\$137.50								
		Review regarding status of State Court searches and e-mail Ms. Yarnall and Mr. Stein regarding same											
12/22/2021	Karen Ellis	Conference with Ms. Ellis and Mr. Stein regarding sunrise witness search	\$275.00	0.5	\$137.50								
12/22/2021	Megan Yarnall	Review files regarding: witness search	\$550.00	0.5	\$275.00								
12/22/2021	Megan Yarnall	Meeting with Ms. Yarnall and Ms. Ellis regarding: restarting investigation of witnesses	\$550.00	0.5	\$275.00			0.5	\$	275.00			
12/23/2021	Karen Ellis	Telephone with Ms. Yarnall regarding class notice mailing and fielding calls	\$275.00	0.4	\$110.00								
		Conference with Ms. Ellis regarding contacts with class members and class notice and email partners regarding: same											
12/23/2021	Megan Yarnall	Download and review pleadings	\$550.00	0.3	\$165.00								
12/27/2021	Karen Ellis	Review e-mail from Ms. Yarnall to Mr. Thamer	\$275.00	0.8	\$220.00			0.8	\$	220.00			
12/27/2021	Karen Ellis	Email Mr. Thamer regarding witness investigation	\$275.00	0.3	\$82.50								
12/27/2021	Megan Yarnall	Review file regarding: witness search	\$550.00	0.2	\$110.00								
12/27/2021	Megan Yarnall	Conference with Ms. Ellis regarding case status and witness search	\$550.00	0.3	\$165.00								
12/28/2021	Megan Yarnall	E-mails to/from Ms. Yarnall regarding status meeting	\$275.00	0.3	\$82.50								
12/29/2021	Karen Ellis	Download and review pleadings	\$275.00	0.7	\$192.50			0.7	\$	192.50			
12/31/2021	Karen Ellis	Review e-mail and voice mail from Ms. Chilson	\$275.00	0.4	\$110.00								
1/5/2022	Karen Ellis	Review prior communications from class members regarding prior communication from Ms. Chilson	\$275.00	0.4	\$110.00								
1/6/2022	Karen Ellis	E-mails to/from Mr. Stein regarding status	\$275.00	0.2	\$55.00								
1/7/2022	Karen Ellis	Review correspondence regarding discovery motion hearings and preliminary order	\$550.00	0.5	\$275.00								
1/7/2022	Megan Yarnall	Review e-mail from Mr. Thamer	\$275.00	0.2	\$55.00								
1/11/2022	Karen Ellis	Telephone call with Ms. Yarnall regarding status	\$275.00	0.2	\$55.00								
1/11/2022	Karen Ellis	Conference with Ms. Ellis regarding witness discovery	\$275.00	0.2	\$55.00								
1/11/2022	Megan Yarnall	Review class list data	\$550.00	0.2	\$110.00								
1/11/2022	Megan Yarnall	Review correspondence regarding class list data	\$550.00	0.3	\$165.00								
1/11/2022	Megan Yarnall	Conference with Ms. Yarnall regarding Belaire list and status of class notice;	\$550.00	0.2	\$110.00								
1/12/2022	Karen Ellis	review e-mails regarding same	\$275.00	0.4	\$110.00								
		Conference with Ms. Ellis regarding Belaire list, class notice, and potential witness outreach											
1/12/2022	Megan Yarnall	Review correspondence regarding belaire list and potential witnesses	\$550.00	0.2	\$110.00								
1/12/2022	Megan Yarnall	Download and review appellate pleading	\$550.00	0.2	\$110.00								
1/13/2022	Karen Ellis	Review class list	\$275.00	0.2	\$55.00			0.2	\$	55.00			
1/13/2022	Karen Ellis	Review correspondence regarding: promodel and related discovery	\$275.00	0.3	\$82.50								
1/13/2022	Karen Ellis	Review correspondence regarding: promodel and related discovery	\$550.00	0.2	\$110.00								
1/14/2022	Karen Ellis	Locate and forward all contact info to Ms. Yarnall	\$275.00	0.5	\$137.50								
		Review e-mail from Ms. Yarnall regarding forwarding spreadsheets of contacts regarding Belaire notice and e-mails/letters											
1/14/2022	Karen Ellis	Review and compare class list, previous putative class member list, and our list of contacts with sunrise residents and email Ms. Ellis regarding same.	\$275.00	0.2	\$55.00								
1/14/2022	Megan Yarnall	Review class list, compare to previous contacts amd email Mr. Foss regarding: same.	\$550.00	2	\$1,100.00								
1/18/2022	Megan Yarnall	Draft memo regarding: class list and belaire contacts	\$550.00	0.9	\$495.00								
1/19/2022	Megan Yarnall	Review data regarding: class list and BelAire contacts	\$550.00	0.6	\$330.00								
1/19/2022	Megan Yarnall	Review data regarding: class list and BelAire contacts	\$550.00	2.9	\$1,595.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
1/20/2022	Karen Ellis	Review e-mail from Ms. Yarnall to Mr. Healey	\$275.00	0.2	\$55.00								
1/20/2022	Megan Yarnall	Review class list data and email Mr. Healey regarding: same.	\$550.00	0.9	\$495.00								
1/21/2022	Karen Ellis	Conference with Ms. Yarnall	\$275.00	0.2	\$55.00								
1/21/2022	Karen Ellis	E-mails from/to Ms. Yarnall regarding spreadsheet regarding contacts	\$275.00	0.3	\$82.50								
1/21/2022	Megan Yarnall	Conference with Ms. Ellis regarding class list and class member witness outreach	\$550.00	0.2	\$110.00								
1/21/2022	Megan Yarnall	Review witness lists and email Ms. Ellis regarding: same.	\$550.00	1	\$550.00								
1/25/2022	Megan Yarnall	Review correspondence regarding: dispute over class list and arbitration signatures	\$550.00	0.2	\$110.00								
1/26/2022	Megan Yarnall	Review meet and confer correspondence regarding case schedule	\$550.00	0.2	\$110.00								
2/1/2022	Megan Yarnall	Email Mr. Foss regarding class contacts and potential witnesses	\$550.00	0.1	\$55.00								
2/1/2022	Megan Yarnall	Review correspondence regarding same	\$550.00	0.1	\$55.00								
2/2/2022	Karen Ellis	Download numerous pleadings	\$275.00	1.6	\$440.00	1.6	\$	440.00					
2/2/2022	Megan Yarnall	Review correspondence regarding Motion for Summary Judgment filed by Sunrise	\$550.00	0.2	\$110.00								
2/3/2022	Karen Ellis	Review e-mail from Ms. Yarnall regarding Motion for Summary Judgment, team meeting and status	\$275.00	0.2	\$55.00								
2/3/2022	Karen Ellis	Telephone call with Ms. Yarnall regarding motion for summary judgment	\$275.00	0.2	\$55.00								
2/7/2022	Megan Yarnall	Review correspondence and case schedule	\$550.00	0.2	\$110.00								
2/8/2022	Karen Ellis	Pull notes regarding conversations with class members	\$275.00	0.8	\$220.00								
2/8/2022	Karen Ellis	Review list of contacts from Ms. Yarnall	\$275.00	0.3	\$82.50								
2/8/2022	Megan Yarnall	Review and reply to emails from Mr. Healey regarding potential witness search	\$550.00	0.2	\$110.00								
2/9/2022	Karen Ellis	Prepare for telephone with Ms. Yarnall	\$275.00	0.3	\$82.50								
2/9/2022	Karen Ellis	Telephone with Ms. Yarnall regarding status of notice to class members and prior contacts	\$275.00	0.5	\$137.50								
2/9/2022	Megan Yarnall	Discuss trial plan and witness discovery with Ms. Ellis	\$550.00	0.5	\$275.00								
2/9/2022	Megan Yarnall	Prepare for and attend Conference with Mr. Healey regarding: witness discovery and trial plan	\$550.00	0.5	\$275.00								
2/9/2022	Megan Yarnall	Review and reply to correspondence from Mr. Foss regarding witness contacts.	\$550.00	0.2	\$110.00								
2/9/2022	Megan Yarnall	Review file and witness lists regarding same	\$550.00	0.5	\$275.00								
2/10/2022	Karen Ellis	E-mails from/to Ms. Yarnall regarding meeting on Monday morning regarding status	\$275.00	0.3	\$82.50								
2/10/2022	Karen Ellis	E-mails from/to Ms. Yarnall regarding to do list	\$275.00	0.2	\$55.00	0.2	\$	55.00					
2/10/2022	Megan Yarnall	Compare class list to happy camper declarations and contacts with Arns Firm	\$550.00	2.4	\$1,320.00								
2/10/2022	Megan Yarnall	Conference with co-counsel regarding to do list and witness search	\$550.00	0.7	\$385.00				0.7	\$	385.00		
2/10/2022	Megan Yarnall	Draft memo regarding witness search and declarations and email Ms. Ellis regarding same	\$550.00	0.5	\$275.00								
2/11/2022	Karen Ellis	Review e-mails regarding agenda items and status	\$275.00	0.7	\$192.50								
2/11/2022	Karen Ellis	Review voice mail from April regarding status (forwarded from CH)	\$275.00	0.4	\$110.00								
2/11/2022	Megan Yarnall	Review and reply to correspondence regarding to do list and witness search	\$550.00	0.2	\$110.00								
2/11/2022	Megan Yarnall	Review draft letter to former subject to arbitration putative class members	\$550.00	0.2	\$110.00								
2/14/2022	Karen Ellis	Conference with Ms. Yarnall regarding status	\$275.00	0.2	\$55.00				0.2	\$	55.00		
2/14/2022	Karen Ellis	E-mail Mr. Healey regarding status	\$275.00	0.2	\$55.00								
2/14/2022	Karen Ellis	E-mail to Ms. Yarnall	\$275.00	0.2	\$55.00								
2/14/2022	Karen Ellis	Prepare notes regarding prior contacts with class members	\$275.00	1.3	\$357.50								
2/14/2022	Karen Ellis	Review e-mails regarding status	\$275.00	0.3	\$82.50								
2/14/2022	Karen Ellis	Review voicemail forwarded by Mr. Healey regarding status inquiry by \034April\034; attempt to contact April	\$275.00	0.2	\$55.00								
2/14/2022	Megan Yarnall	Conference with Ms. Ellis regarding witness outreach	\$550.00	0.2	\$110.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
2/14/2022	Megan Yarnall	Review and reply to email from Mr. Healey regarding witness outreach.	\$550.00	0.2	\$110.00								
2/15/2022	Karen Ellis	Download and save Appellate filing	\$275.00	0.2	\$55.00	0.2	\$	55.00					
2/15/2022	Karen Ellis	Telephone call with Ms. Yarnall regarding status	\$275.00	0.6	\$165.00								
2/16/2022	Megan Yarnall	Discuss with Ms. Ellis	\$550.00	0.6	\$330.00								
2/16/2022	Megan Yarnall	Draft letters to class members	\$550.00	0.6	\$330.00								
2/16/2022	Megan Yarnall	Review witness outreach correspondence	\$550.00	0.5	\$275.00								
2/17/2022	Megan Yarnall	Review motion for summary judgment and happy camper declarations	\$550.00	2.1	\$1,155.00								
2/18/2022	Megan Yarnall	Conference with Ms. Ellis regarding witness outreach	\$550.00	0.2	\$110.00								
2/18/2022	Megan Yarnall	Review defendant's Motion for Summary Judgment in preparation to draft class member declarations	\$550.00	1.2	\$660.00								
2/22/2022	Megan Yarnall	Plan regarding: timing and content of outreach	\$550.00	0.4	\$220.00								
2/22/2022	Megan Yarnall	Prepare class list for mail and email outreach	\$550.00	2.1	\$1,155.00								
2/23/2022	Megan Yarnall	Edit and analyze class list for outreach	\$550.00	3	\$1,650.00								
2/24/2022	Karen Ellis	Download and review pleadings and e-mail Ms. Yarnall regarding same	\$275.00	1	\$275.00	1	\$	275.00					
2/24/2022	Karen Ellis	E-mails from/to Ms. Yarnall regarding status of class member outreach	\$275.00	0.4	\$110.00								
2/24/2022	Megan Yarnall	Prepare class member outreach materials and letters and email Ms. Ellis regarding same	\$550.00	2.1	\$1,155.00								
2/24/2022	Megan Yarnall	Review emails regarding discovery plans	\$550.00	0.3	\$165.00								
2/25/2022	Karen Ellis	Review draft outreach letter and e-mail Ms. Yarnall regarding same	\$275.00	0.6	\$165.00								
2/25/2022	Karen Ellis	Review e-mail regarding class counsel and attorney client relationship	\$275.00	0.5	\$137.50								
2/25/2022	Megan Yarnall	Email Ms. Ellis regarding class lists	\$550.00	0.3	\$165.00								
2/25/2022	Megan Yarnall	Prepare for witness outreach	\$550.00	0.2	\$110.00								
2/25/2022	Megan Yarnall	Review happy camper declarants	\$550.00	0.2	\$110.00								
2/25/2022	Megan Yarnall	Review research regarding contact with class members	\$550.00	0.3	\$165.00								
2/28/2022	Karen Ellis	E-mails from/to Ms. Yarnall regarding mailing to declarants	\$275.00	0.2	\$55.00								
2/28/2022	Megan Yarnall	Draft letter to declarants who are not members of class	\$550.00	0.4	\$220.00								
2/28/2022	Megan Yarnall	Review happy camper declarations to determine whether we have contact information for declarants	\$550.00	0.5	\$275.00								
2/28/2022	Megan Yarnall	Revise letters to class members and email Ms. Ellis regarding same	\$550.00	0.5	\$275.00								
3/1/2022	Karen Ellis	conference with Ms. Yarnall regarding mailings, questionnaires, etc.	\$275.00	0.5	\$137.50								
3/1/2022	Karen Ellis	Preparation of excel list of contact information regarding same and e-mail Ms. Yarnall regarding same	\$275.00	1.3	\$357.50								
3/1/2022	Karen Ellis	Review draft letter to past declarants	\$275.00	0.5	\$137.50								
3/1/2022	Megan Yarnall	Conference with Ms. Ellis regarding class outreach and declarations	\$550.00	0.5	\$275.00								
3/1/2022	Megan Yarnall	Draft and revise letter to happy campers	\$550.00	1	\$550.00								
3/1/2022	Megan Yarnall	Draft memo regarding class outreach to co-counsel	\$550.00	1.7	\$935.00								
3/1/2022	Megan Yarnall	Email Ms. Keller regarding email outreach	\$550.00	0.2	\$110.00								
3/1/2022	Megan Yarnall	Review and revise class list for mailing	\$550.00	1.5	\$825.00								
3/2/2022	Karen Ellis	Review e-mails from Ms. Yarnall regarding letters and status	\$275.00	0.4	\$110.00								
3/2/2022	Karen Ellis	Review intake form	\$275.00	0.4	\$110.00								
3/2/2022	Karen Ellis	Review notes regarding prior intakes	\$275.00	0.4	\$110.00								
3/2/2022	Megan Yarnall	Draft template declaration for supporting witnesses and email Ms. Ellis regarding same	\$550.00	0.8	\$440.00								
3/3/2022	Karen Ellis	Locate and review interview intake form and forward to Ms. Yarnall	\$275.00	0.4	\$110.00								
3/3/2022	Karen Ellis	Review draft letters to declarants and class members	\$275.00	0.4	\$110.00								
3/3/2022	Megan Yarnall	Finalize letters to declarants	\$550.00	1.3	\$715.00								
3/3/2022	Megan Yarnall	Prepare outreach for class members	\$550.00	1.3	\$715.00								
3/3/2022	Megan Yarnall	Review and revise intake form for class member witness calls	\$550.00	0.6	\$330.00								
3/4/2022	Karen Ellis	Review e-mails to/from Ms. Yarnall to team and Mr. Healey regarding outreaches to class members	\$275.00	0.2	\$55.00								
3/4/2022	Karen Ellis	Conference with Ms. Yarnall regarding mailings and status	\$275.00	0.4	\$110.00								
3/4/2022	Karen Ellis	Review draft letters	\$275.00	1	\$275.00								
3/4/2022	Megan Yarnall	Email co-counsel regarding: class outreach and happy campers	\$550.00	0.3	\$165.00								
3/4/2022	Megan Yarnall	Review happy camper list	\$550.00	1.8	\$990.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
3/4/2022	Megan Yarnall	Revise letters to past declarants and class members and discuss same with Ms. Ellis.	\$550.00	0.4	\$220.00								
3/7/2022	Karen Ellis	Review draft mailings to class members	\$275.00	0.6	\$165.00								
3/7/2022	Karen Ellis	Review e-mails and to do list	\$275.00	0.2	\$55.00	0.2	\$	55.00					
3/7/2022	Karen Ellis	Revise intake Questionnaire	\$275.00	1.3	\$357.50								
3/8/2022	Karen Ellis	Assist in emailing lists	\$275.00	0.7	\$192.50								
3/8/2022	Karen Ellis	Meet with Ms. Yarnall at office regarding class member and other outreaches	\$275.00	0.7	\$192.50								
3/8/2022	Karen Ellis	Review and Forward revised intake Questionnaire to Ms. Yarnall	\$275.00	0.5	\$137.50								
3/8/2022	Karen Ellis	Review and proof lists	\$275.00	1	\$275.00								
3/8/2022	Karen Ellis	Review responses to e-mails	\$275.00	1.4	\$385.00								
3/8/2022	Karen Ellis	Save send e-mails to folder	\$275.00	1.1	\$302.50								
3/8/2022	Megan Yarnall	Conference with Ms. Ellis regarding class member outreach	\$550.00	0.7	\$385.00								
3/8/2022	Megan Yarnall	Draft letters to happy campers, past contacts, and plaintiff's side declarants, send all.	\$550.00	2.5	\$1,375.00								
3/8/2022	Megan Yarnall	Revise contact list and review same	\$550.00	4	\$2,200.00								
3/9/2022	Karen Ellis	Forward e-mail from Mr. Simmons to Ms. Yarnall for input	\$275.00	0.2	\$55.00								
3/9/2022	Karen Ellis	respond to calls regarding e-mail outreach	\$275.00	5.8	\$1,595.00								
3/9/2022	Karen Ellis	Schedule appointments for questionnaire intakes	\$275.00	0.4	\$110.00								
3/9/2022	Karen Ellis	Set up spreadsheets for e-mail response and e-mail Ms. Yarnall regarding same	\$275.00	0.4	\$110.00								
3/9/2022	Karen Ellis	Update spreadsheets	\$275.00	0.8	\$220.00								
3/9/2022	Megan Yarnall	Conference with Ms. Ellis regarding happy camper responses	\$550.00	0.2	\$110.00								
3/9/2022	Megan Yarnall	Email Chris Healey and other co-counsel regarding happy camper responses	\$550.00	0.2	\$110.00								
3/9/2022	Megan Yarnall	Review and reply to email regarding: same	\$550.00	0.2	\$110.00								
3/9/2022	Megan Yarnall	Review class list for further outreach opportunities	\$550.00	1.3	\$715.00								
3/10/2022	Karen Ellis	Conference with Ms. Yarnall regarding status, happy campers and declarations	\$275.00	0.4	\$110.00								
3/10/2022	Karen Ellis	E-mails from/to potential declarants	\$275.00	0.2	\$55.00								
3/10/2022	Karen Ellis	E-mails to/from Ms. Yarnall regarding happy campers and reviewing prior declarations	\$275.00	0.3	\$82.50								
3/10/2022	Karen Ellis	Respond to calls regarding e-mail outreach	\$275.00	4.3	\$1,182.50								
3/10/2022	Karen Ellis	Schedule appointments for questionnaire intakes	\$275.00	0.3	\$82.50								
3/10/2022	Karen Ellis	Update spreadsheets	\$275.00	1	\$275.00								
3/10/2022	Megan Yarnall	Conference with Ms. Ellis regarding happy camper responses and email co-counsel regarding: same	\$550.00	0.8	\$440.00								
3/10/2022	Megan Yarnall	Prepare further outreach materials and plan with Ms. Ellis.	\$550.00	1.2	\$660.00								
3/10/2022	Megan Yarnall	Review happy camper declarations	\$550.00	2	\$1,100.00								
3/11/2022	Karen Ellis	Conference with Ms. Yarnall regarding status	\$275.00	0.5	\$137.50								
3/11/2022	Karen Ellis	E-mails to/from Ms. Yarnall	\$275.00	0.3	\$82.50								
3/11/2022	Karen Ellis	Respond to call regarding e-mail outreach	\$275.00	5.2	\$1,430.00								
3/11/2022	Karen Ellis	Schedule appointments for questionnaire intakes	\$275.00	0.3	\$82.50								
3/11/2022	Karen Ellis	Update spreadsheets	\$275.00	0.3	\$82.50								
3/11/2022	Megan Yarnall	Draft outreach letters	\$550.00	0.8	\$440.00								
3/11/2022	Megan Yarnall	review responses from outreach and associated documents	\$550.00	2.5	\$1,375.00								
3/11/2022	Megan Yarnall	Conference with Ms. Ellis regarding outreach efforts, discuss outreach timing with Ms. Ellis.	\$550.00	0.5	\$275.00								
3/14/2022	Karen Ellis	E-mails to/from Ms. Yarnall	\$275.00	0.2	\$55.00								
3/14/2022	Karen Ellis	Respond to calls regarding e-mail outreach	\$275.00	6	\$1,650.00								
3/14/2022	Karen Ellis	Schedule appointments for questionnaire intakes	\$275.00	0.2	\$55.00								
3/14/2022	Karen Ellis	Update spreadsheets	\$275.00	0.7	\$192.50								
3/14/2022	Megan Yarnall	Conference with Ms. Ellis regarding class member outreach	\$550.00	0.2	\$110.00								

Fees

Date	Time Keeper	Task Description	Hourly	Hours	Fee (Rate x Hours)	Lodestar Reductions		CC Confs	Falkenberg	Travel
			Rate	worked		General	Fees			
3/14/2022	Megan Yarnall	Review and reply to emails regarding response from happy camper witness.	\$550.00	0.3	\$165.00					
3/15/2022	Karen Ellis	Update spreadsheets	\$275.00	0.4	\$110.00					
3/15/2022	Karen Ellis	E-mails to/from Ms. Yarnall; conference with Ms. Yarnall regarding status	\$275.00	0.6	\$165.00					
3/15/2022	Karen Ellis	Respond to calls regarding e-mail outreach	\$275.00	5.9	\$1,622.50					
3/15/2022	Karen Ellis	Work with Ms. Yarnall to send additional e-mails to class members	\$275.00	0.7	\$192.50					
3/15/2022	Megan Yarnall	Conference with Ms. Ellis regarding Mx. C happy camper and potential declaration	\$550.00	0.6	\$330.00					
3/15/2022	Megan Yarnall	Correct issues with class list regarding: same	\$550.00	1	\$550.00					
3/15/2022	Megan Yarnall	Prepare and email Ms. Ellis list of current outreach attempts	\$550.00	0.5	\$275.00					
3/15/2022	Megan Yarnall	Review notes and emails regarding same	\$550.00	0.2	\$110.00					
3/15/2022	Megan Yarnall	Work with Ms. Ellis to send next batch of class outreach	\$550.00	0.5	\$275.00					
3/16/2022	Karen Ellis	E-mails to/from Ms. Yarnall regarding Mx. C and Mx. M	\$275.00	0.4	\$110.00					
3/16/2022	Karen Ellis	Respond to calls regarding e-mail outreach	\$275.00	6.8	\$1,870.00					
3/16/2022	Karen Ellis	Update spreadsheets	\$275.00	0.6	\$165.00					
3/16/2022	Megan Yarnall	Draft memo regarding: Mx. C	\$550.00	0.5	\$275.00					
3/16/2022	Megan Yarnall	Email with Ms. Ellis regarding outreach	\$550.00	0.3	\$165.00					
3/16/2022	Megan Yarnall	Review other witness search information	\$550.00	0.6	\$330.00					
3/16/2022	Megan Yarnall	Review outreach response rate	\$550.00	0.6	\$330.00					
3/17/2022	Karen Ellis	Respond to calls regarding e-mail outreach; update spreadsheets	\$275.00	7.6	\$2,090.00					
3/17/2022	Megan Yarnall	Email Ms. Ellis regarding witness outreach efforts	\$550.00	0.2	\$110.00					
3/17/2022	Megan Yarnall	Review correspondence and notes regarding: witness outreach efforts	\$550.00	0.2	\$110.00					
3/18/2022	Karen Ellis	Conference with Ms. Yarnall regarding status	\$275.00	0.3	\$82.50					
3/18/2022	Karen Ellis	E-mail contact information for Mr. Iannaccone and Ms. Gibson to Ms. Yarnall	\$275.00	0.3	\$82.50					
3/18/2022	Karen Ellis	E-mails from/to Ms. Gonzalez regarding returned mailings	\$275.00	0.3	\$82.50					
3/18/2022	Karen Ellis	Respond to calls regarding e-mail outreach	\$275.00	5.9	\$1,622.50					
3/18/2022	Karen Ellis	Update spreadsheets	\$275.00	0.5	\$137.50					
3/18/2022	Megan Yarnall	Conference with Ms. Ellis regarding status of witness outreach	\$550.00	0.3	\$165.00					
3/18/2022	Megan Yarnall	Review notes regarding: same	\$550.00	0.2	\$110.00					
3/21/2022	Karen Ellis	E-mail same to Ms. Walantus	\$275.00	0.2	\$55.00					
3/21/2022	Karen Ellis	Forward non-rep sample to Ms. Yarnall	\$275.00	0.2	\$55.00					
3/21/2022	Karen Ellis	Prepare non-rep letter for Ms. Walantus	\$275.00	0.3	\$82.50					
3/21/2022	Karen Ellis	Respond to calls regarding e-mail outreach	\$275.00	5.1	\$1,402.50					
3/21/2022	Karen Ellis	Save non-rep template prepared by Ms. Yarnall	\$275.00	0.2	\$55.00					
3/21/2022	Karen Ellis	Telephone call with Ms. Yarnall regarding non-rep letter	\$275.00	0.2	\$55.00					
3/21/2022	Karen Ellis	Update spreadsheets	\$275.00	0.5	\$137.50					
3/21/2022	Megan Yarnall	Discuss witness outreach with Ms. Ellis	\$550.00	0.2	\$110.00					
3/21/2022	Megan Yarnall	Draft nonrep letter regarding: same	\$550.00	0.5	\$275.00					
3/21/2022	Megan Yarnall	Review and reply to correspondence from potential witnesses	\$550.00	0.5	\$275.00					
3/22/2022	Karen Ellis	Prepare contact status worksheet and forward to Ms. Yarnall	\$275.00	2.2	\$605.00					
3/22/2022	Karen Ellis	Respond to calls regarding e-mail outreach	\$275.00	4.5	\$1,237.50					
3/22/2022	Karen Ellis	Update spreadsheets	\$275.00	0.5	\$137.50					
3/22/2022	Megan Yarnall	Email Ms. Ellis regarding status of class outreach	\$550.00	0.1	\$55.00					
3/22/2022	Megan Yarnall	Review class list and email Mr. Healey and Mr. Umpierre regarding deficient addresses	\$550.00	0.3	\$165.00					
3/22/2022	Megan Yarnall	Review Ms. Ellis notes regarding: potential declarants	\$550.00	0.1	\$55.00					
3/23/2022	Karen Ellis	E-mails to/from Ms. Yarnall regarding weekly update letter/e-mail to Seal	\$275.00	0.4	\$110.00					
3/23/2022	Karen Ellis	Beach residents	\$275.00	0.4	\$110.00					
3/23/2022	Karen Ellis	Respond to calls regarding e-mail outreach	\$275.00	6.4	\$1,760.00					
3/23/2022	Karen Ellis	Update spreadsheets	\$275.00	0.6	\$165.00					
3/24/2022	Karen Ellis	E-mails to/from Ms. Yarnall regarding outreach	\$275.00	0.2	\$55.00					
3/24/2022	Karen Ellis	Respond to calls regarding e-mail outreach	\$275.00	5	\$1,375.00					

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
3/24/2022	Karen Ellis	Update spreadsheets	\$275.00	0.4	\$110.00								
		E-mails to/from Ms. Yarnall regarding information provided by class member regarding offer of payment for signing arbitration agreement and former employee											
3/25/2022	Karen Ellis	Respond to calls regarding e-mail outreach	\$275.00	5.7	\$1,567.50								
3/25/2022	Karen Ellis	Update spreadsheets	\$275.00	0.5	\$137.50								
3/28/2022	Megan Yarnall	Email Mr. Umpierre regarding class list	\$550.00	0.2	\$110.00								
3/28/2022	Megan Yarnall	Review correspondence from 60 class members	\$550.00	1.2	\$660.00								
3/28/2022	Megan Yarnall	Summarize deficiencies in class list	\$550.00	0.7	\$385.00								
3/29/2022	Karen Ellis	E-mails to/from Ms. Yarnall regarding suggested handling of e-mail	\$275.00	0.2	\$55.00								
3/29/2022	Karen Ellis	Respond to calls regarding e-mail outreach	\$275.00	4.4	\$1,210.00								
3/29/2022	Karen Ellis	Review e-mail from Ms. Yarnall regarding class list deficiencies	\$275.00	0.2	\$55.00								
3/29/2022	Karen Ellis	Update spreadsheets	\$275.00	0.4	\$110.00								
		Edit data regarding class list and reply to additional correspondence regarding same											
3/29/2022	Megan Yarnall	Email Mr. Umpierre regarding: class list contacts	\$550.00	1.1	\$605.00								
3/29/2022	Megan Yarnall	Review correspondence regarding: class list and reply to same with data regarding: class list	\$550.00	0.3	\$165.00								
3/29/2022	Megan Yarnall	Review correspondence regarding: interview with resident care coordinator witness	\$550.00	0.6	\$330.00								
3/29/2022	Megan Yarnall	Review summary regarding class list contacts	\$550.00	0.2	\$110.00								
3/29/2022	Megan Yarnall	Review summary regarding class list contacts	\$550.00	1	\$550.00								
3/30/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	6.7	\$1,842.50								
3/30/2022	Karen Ellis	Update spreadsheets	\$275.00	0.6	\$165.00								
3/30/2022	Megan Yarnall	Research regarding: witness outreach and class list	\$550.00	0.7	\$385.00								
3/30/2022	Megan Yarnall	Review correspondence regarding witness outreach and class list	\$550.00	0.2	\$110.00								
3/31/2022	Karen Ellis	Update spreadsheets	\$275.00	0.7	\$192.50								
3/31/2022	Karen Ellis	Meet with Ms. Yarnall to send additional batch of e-mails	\$275.00	0.7	\$192.50								
3/31/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	6.2	\$1,705.00								
3/31/2022	Megan Yarnall	Conference with Ms. Ellis regarding class member outreach	\$550.00	0.7	\$385.00								
3/31/2022	Megan Yarnall	Prepare outreach correspondence and memo regarding outreach	\$550.00	0.8	\$440.00								
4/1/2022	Karen Ellis	E-mails from/to Ms. Yarnall regarding Appeal	\$275.00	0.3	\$82.50								
4/1/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	7.2	\$1,980.00								
4/1/2022	Karen Ellis	Update spreadsheets	\$275.00	0.7	\$192.50								
4/1/2022	Megan Yarnall	Review correspondence regarding Mx. JW and call Mx. JW	\$550.00	0.2	\$110.00								
4/1/2022	Megan Yarnall	Review notes regarding: class member Mx. JW	\$550.00	0.3	\$165.00								
		Review order regarding appeal of class cert decision and correspondence regarding same.											
4/1/2022	Megan Yarnall	Review order regarding appeal of class cert decision and correspondence regarding same.	\$550.00	0.2	\$110.00								
4/4/2022	Megan Yarnall	Review emails regarding proposed stay while on appeal and respond to same.	\$550.00	0.2	\$110.00								
4/5/2022	Karen Ellis	E-mails to/from Ms. Yarnall regarding responding to class member	\$275.00	0.3	\$82.50								
4/5/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	6.9	\$1,897.50								
4/5/2022	Karen Ellis	Review e-mail regarding Appeal status	\$275.00	0.2	\$55.00								
4/5/2022	Karen Ellis	Update spreadsheets	\$275.00	0.6	\$165.00								
4/5/2022	Megan Yarnall	Review and reply to email from Ms. Ellis regarding class member outreach.	\$550.00	0.2	\$110.00								
		Review correspondence and filings regarding stay and pending 9th circuit appeal											
4/5/2022	Megan Yarnall	Review correspondence and filings regarding stay and pending 9th circuit appeal	\$550.00	0.5	\$275.00								
4/6/2022	Karen Ellis	Download and review Court pleadings	\$275.00	0.5	\$137.50	0.5	\$	137.50					
4/6/2022	Karen Ellis	Download Appellate pleadings	\$275.00	0.2	\$55.00	0.2	\$	55.00					
4/6/2022	Karen Ellis	E-mails to/from Ms. Yarnall regarding sealed pleadings	\$275.00	0.2	\$55.00								
		E-mails to/from Ms. Yarnall regarding staffing calculation information provided by class member											
4/6/2022	Karen Ellis	E-mails to/from Ms. Yarnall regarding staffing calculation information provided by class member	\$275.00	0.3	\$82.50								
4/6/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	4.9	\$1,347.50								
4/6/2022	Karen Ellis	Update spreadsheets	\$275.00	0.7	\$192.50								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
4/7/2022	Karen Ellis	E-mails to/from Ms. Yarnall regarding status update and telephone call	\$275.00	0.2	\$55.00								
4/7/2022	Karen Ellis	Download and review pleadings filed under seal	\$275.00	0.4	\$110.00	0.4	\$	110.00					
4/7/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	6.1	\$1,677.50								
4/7/2022	Karen Ellis	Update spreadsheets	\$275.00	0.5	\$137.50								
4/7/2022	Megan Yarnall	Draft memo regarding class outreach	\$550.00	1.8	\$990.00								
4/7/2022	Megan Yarnall	Respond to emails from class members and email Ms. Ellis regarding outreach	\$550.00	0.6	\$330.00								
4/8/2022	Karen Ellis	Download and review Appellate pleadings	\$275.00	0.3	\$82.50	0.3	\$	82.50					
4/8/2022	Karen Ellis	E-mails from/to Ms. Yarnall regarding outreach status	\$275.00	0.2	\$55.00								
4/8/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	5.7	\$1,567.50								
4/8/2022	Karen Ellis	Telephone call with Ms. Yarnall regarding same	\$275.00	0.2	\$55.00								
4/8/2022	Karen Ellis	Update spreadsheets	\$275.00	0.5	\$137.50								
4/8/2022	Megan Yarnall	Conference with Ms. Ellis regarding case status	\$550.00	0.2	\$110.00								
4/8/2022	Megan Yarnall	Draft and email memo regarding class outreach status	\$550.00	0.6	\$330.00								
4/8/2022	Megan Yarnall	Examine outreach list and responses so far.	\$550.00	0.4	\$220.00								
4/11/2022	Karen Ellis	E-mail Ms. Yarnall regarding telephone call with additional \034Happy Camper\034	\$275.00	0.2	\$55.00								
4/11/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	4.8	\$1,320.00								
4/11/2022	Karen Ellis	Update spreadsheets	\$275.00	0.3	\$82.50								
4/11/2022	Megan Yarnall	Conference with Wendy York's office regarding class member as potential witness	\$550.00	0.3	\$165.00								
4/12/2022	Karen Ellis	E-mails from/to Ms. Yarnall regarding Stay Order	\$275.00	0.2	\$55.00								
4/12/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	5.7	\$1,567.50								
4/12/2022	Karen Ellis	Update spreadsheets	\$275.00	0.4	\$110.00								
4/12/2022	Megan Yarnall	Review order regarding stay during pending appeal and review correspondence regarding same.	\$550.00	0.2	\$110.00								
4/13/2022	Karen Ellis	Download and review pleadings	\$275.00	0.2	\$55.00	0.2	\$	55.00					
4/13/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	4.8	\$1,320.00								
4/13/2022	Karen Ellis	Update spreadsheets	\$275.00	0.5	\$137.50								
4/14/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	4.5	\$1,237.50								
4/14/2022	Karen Ellis	Telephone call with Ms. Yarnall regarding status of outreach	\$275.00	0.3	\$82.50								
4/14/2022	Karen Ellis	Update spreadsheets	\$275.00	0.5	\$137.50								
4/14/2022	Megan Yarnall	Conference with Ms. Ellis regarding case status and witness search	\$550.00	0.3	\$165.00								
4/15/2022	Karen Ellis	Called Anita and left message to delete Mr. Needham from docket	\$275.00	0.2	\$55.00								
4/15/2022	Karen Ellis	E-mails to/from Ms. Yarnall regarding 9th Circuit and Mr. Needham	\$275.00	0.2	\$55.00								
4/15/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	4.2	\$1,155.00								
4/15/2022	Karen Ellis	Review e-mail regarding call from Anita at Ninth Circuit Court regarding Mr. Needham not registering for electronic filing	\$275.00	0.2	\$55.00								
4/15/2022	Karen Ellis	Update spreadsheets	\$275.00	0.4	\$110.00								
4/18/2022	Karen Ellis	E-mails to/from Ms. Yarnall regarding referring Mr. Oko to CANHR	\$275.00	0.3	\$82.50								
4/18/2022	Karen Ellis	E-mails to/from Ms. Yarnall regarding Mx. SM/Ms. York	\$275.00	0.3	\$82.50								
4/18/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	4.4	\$1,210.00								
4/18/2022	Karen Ellis	Update spreadsheets	\$275.00	0.4	\$110.00								
4/19/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	4.7	\$1,292.50								
4/19/2022	Karen Ellis	Update spreadsheets	\$275.00	0.4	\$110.00								
4/19/2022	Megan Yarnall	Review correspondence regarding appellate case status	\$550.00	0.2	\$110.00								
4/20/2022	Karen Ellis	Respond to calls and e-mails regarding e-mails outreach	\$275.00	3.8	\$1,045.00								
4/20/2022	Karen Ellis	Update spreadsheets	\$275.00	0.3	\$82.50								
4/21/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	2.4	\$660.00								
4/21/2022	Karen Ellis	Update spreadsheets	\$275.00	0.3	\$82.50								
4/22/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	1	\$275.00								
4/22/2022	Karen Ellis	Update spreadsheets	\$275.00	0.2	\$55.00								
4/26/2022	Karen Ellis	Respond to calls and e-mails regarding e-mail outreach	\$275.00	3.7	\$1,017.50								
4/26/2022	Karen Ellis	Scan potential declaration notes into file	\$275.00	0.2	\$55.00								

Fees

Date	Time Keeper	Task Description	Hourly	Hours	Fee (Rate x Hours)	Lodestar Reductions		CC Confs	Falkenberg	Travel
			Rate	worked		General	Fees			
4/26/2022	Karen Ellis	Update spreadsheets	\$275.00	0.2	\$55.00					
5/2/2022	Karen Ellis	E-mails from/to Ms. Yarnall regarding status of outreach e-mails	\$275.00	0.2	\$55.00					
5/2/2022	Karen Ellis	Respond to calls and e-mails regarding outreach	\$275.00	1.7	\$467.50					
5/2/2022	Karen Ellis	Telephone call with Ms. Yarnall regarding outreach	\$275.00	0.2	\$55.00					
5/2/2022	Megan Yarnall	Conference with Ms. Ellis regarding class outreach status and to dos.	\$550.00	0.2	\$110.00					
5/3/2022	Karen Ellis	e-mails to/from Ms. Yarnall regarding question from Ms. Tafazzoli	\$275.00	0.2	\$55.00					
5/3/2022	Karen Ellis	Preparation of non-rep letter for Mr. Grundstein and e-mail same to Ms. Yarnall	\$275.00	0.4	\$110.00					
5/3/2022	Karen Ellis	Respond to calls and e-mails regarding outreach	\$275.00	2.6	\$715.00					
5/3/2022	Megan Yarnall	draft reply to class member inquiry regarding individual action	\$550.00	0.2	\$110.00					
5/3/2022	Megan Yarnall	Review correspondence regarding case status	\$550.00	0.2	\$110.00					
5/4/2022	Karen Ellis	e-mail Mr. Grundstein regarding non-rep letter	\$275.00	0.2	\$55.00					
5/4/2022	Karen Ellis	Respond to calls and e-mails regarding outreach	\$275.00	5.8	\$1,595.00					
5/4/2022	Karen Ellis	Send e-mails to remaining class members; update spread sheet	\$275.00	0.5	\$137.50					
5/4/2022	Megan Yarnall	Conference with Ms. Ellis regarding class member outreach	\$550.00	0.2	\$110.00					
5/4/2022	Megan Yarnall	Send batch of outreach emails and client list regarding	\$550.00	1.2	\$660.00					
5/5/2022	Karen Ellis	Respond to calls and e-mails regarding outreach	\$275.00	2.2	\$605.00					
5/5/2022	Karen Ellis	Update spreadsheet	\$275.00	0.2	\$55.00					
5/6/2022	Karen Ellis	Respond to calls and e-mails regarding outreach	\$275.00	2.1	\$577.50					
5/8/2022	Karen Ellis	Respond to calls and e-mails regarding outreach	\$275.00	2.8	\$770.00					
5/10/2022	Karen Ellis	Respond to call and e-mails regarding outreach	\$275.00	0.6	\$165.00					
5/11/2022	Karen Ellis	Respond to telephone call and e-mails regarding outreach	\$275.00	2.9	\$797.50					
5/11/2022	Karen Ellis	Update spreadsheets	\$275.00	0.3	\$82.50					
5/16/2022	Karen Ellis	Respond to telephone calls and e-mails regarding outreach	\$275.00	1.1	\$302.50					
5/16/2022	Karen Ellis	Update spreadsheets	\$275.00	0.2	\$55.00					
5/16/2022	Megan Yarnall	Conference with Ms. Ellis regarding outreach and status.	\$550.00	0.2	\$110.00					
5/17/2022	Karen Ellis	Respond to telephone calls and e-mails regarding outreach	\$275.00	3.9	\$1,072.50					
5/17/2022	Karen Ellis	Update spreadsheets	\$275.00	0.2	\$55.00					
5/18/2022	Karen Ellis	Respond to calls and e-mails regarding outreach	\$275.00	0.8	\$220.00					
5/18/2022	Karen Ellis	Respond to calls and e-mails regarding outreach	\$275.00	0.8	\$220.00					
5/19/2022	Karen Ellis	Respond to calls and e-mails regarding outreach	\$275.00	0.6	\$165.00					
5/20/2022	Karen Ellis	Review status regarding telephone calls and e-mails regarding outreach	\$275.00	0.6	\$165.00					
5/23/2022	Karen Ellis	Respond to calls and e-mails regarding outreach	\$275.00	1.6	\$440.00					
5/24/2022	Karen Ellis	Respond to calls and e-mails regarding outreach	\$275.00	0.8	\$220.00					
5/25/2022	Karen Ellis	E-mails from/to Ms. DeBruler regarding returned letter	\$275.00	0.2	\$55.00					
5/25/2022	Karen Ellis	Respond to call and e-mails regarding outreach	\$275.00	1	\$275.00					
5/26/2022	Karen Ellis	Respond to calls and e-mails regarding outreach	\$275.00	0.8	\$220.00					
5/26/2022	Karen Ellis	Respond to calls and e-mails regarding outreach;	\$275.00	1.2	\$330.00					
5/27/2022	Karen Ellis	Respond to calls and e-mails regarding outreach	\$275.00	0.7	\$192.50					
6/1/2022	Karen Ellis	Respond to calls and emails regarding outreach	\$275.00	0.9	\$247.50					
6/2/2022	Karen Ellis	Respond to calls and emails regarding outreach	\$275.00	0.3	\$82.50					
6/6/2022	Karen Ellis	Conference with Ms. Yarnall regarding status	\$275.00	0.2	\$55.00					
6/6/2022	Karen Ellis	Review responses to email outreach	\$275.00	0.2	\$55.00					
6/7/2022	Karen Ellis	Review emails responding to outreach	\$275.00	0.2	\$55.00					
6/7/2022	Karen Ellis	telephone conference with Ms. Yarnall regarding status of outreach	\$275.00	0.2	\$55.00					
6/9/2022	Karen Ellis	Review and organize outreach notes	\$275.00	0.8	\$220.00					
6/16/2022	Karen Ellis	Emails from/to Eileen Baum regarding status	\$275.00	0.3	\$82.50					
6/17/2022	Karen Ellis	Review email from Mr. Healey regarding status	\$275.00	0.2	\$55.00					
6/17/2022	Karen Ellis	Review voice mail from putative class member	\$275.00	0.2	\$55.00					
6/17/2022	Karen Ellis	Telephone conference with Ms. Yarnall regarding status	\$275.00	0.2	\$55.00					
6/17/2022	Megan Yarnall	Review and reply to correspondence regarding class member declarations and record support	\$550.00	0.2	\$110.00					
7/6/2022	Megan Yarnall	Conference with Ms. Ellis regarding status	\$550.00	0.2	\$110.00					
7/7/2022	Karen Ellis	Respond to class member telephone call	\$275.00	0.5	\$137.50					

Fees

Date	Time Keeper	Task Description	Hourly	Hours	Fee (Rate x Hours)	Lodestar Reductions		CC Confs	Falkenberg	Travel	
			Rate	worked		General	Fees				
						Hrs	Fees	Hrs	Fees	Hrs	Fees
		Review and organize telephone messages and emails received from class members	\$275.00	1.7	\$467.50						
7/8/2022	Karen Ellis	Update outreach status lists	\$275.00	0.4	\$110.00						
7/13/2022	Karen Ellis	Email Ms. Abrash	\$275.00	0.2	\$55.00						
7/13/2022	Karen Ellis	Emails to and from Ms. Yarnall	\$275.00	0.2	\$55.00						
		Review email from Ingrid Abrash regarding withdrawing prior statement provided to defendants	\$275.00	0.2	\$55.00						
7/13/2022	Karen Ellis	Review voice mail from class member	\$275.00	0.2	\$55.00						
7/14/2022	Karen Ellis	Review voice messages from Ms. Keating and Ms. Stevens	\$275.00	0.2	\$55.00						
7/21/2022	Karen Ellis	Emails from and to putative class member Cassie Moren regarding status	\$275.00	0.4	\$110.00						
7/27/2022	Karen Ellis	Review voice mail and email from class members	\$275.00	0.3	\$82.50						
8/1/2022	Karen Ellis	Conference with Ms. Ellis regarding status	\$550.00	0.2	\$110.00						
8/8/2022	Megan Yarnall	Review previous email from Chris Healey regarding status and forward email to Ms. Yarnall	\$275.00	0.2	\$55.00						
8/9/2022	Karen Ellis	Start on contact list for potential declarants	\$275.00	0.6	\$165.00						
8/9/2022	Karen Ellis	Work on updating email contact list for potential declarant outreach	\$275.00	3.6	\$990.00						
8/10/2022	Karen Ellis	Review email from Adelfa Stevens	\$275.00	0.2	\$55.00						
8/11/2022	Karen Ellis	Emails from and to Ms. Yarnall regarding email outreach to potential declarants regarding status	\$275.00	0.3	\$82.50						
8/22/2022	Karen Ellis	Review contact spreadsheet	\$275.00	0.2	\$55.00						
8/22/2022	Megan Yarnall	Draft email to potential declarants	\$550.00	0.5	\$275.00						
8/22/2022	Megan Yarnall	Review briefing	\$550.00	0.3	\$165.00						
8/22/2022	Megan Yarnall	Review correspondence re declarations	\$550.00	0.2	\$110.00						
8/23/2022	Karen Ellis	Conference with Ms. Yarnall	\$275.00	0.2	\$55.00						
8/23/2022	Karen Ellis	Forward Mx. PC emails to Ms. Yarnall	\$275.00	0.2	\$55.00						
		Telephone conferences with potential declarants requesting email address information for outreach	\$275.00	2.6	\$715.00						
8/23/2022	Karen Ellis	Update contact spreadsheet	\$275.00	0.2	\$55.00						
8/23/2022	Megan Yarnall	Conference with Ms. Ellis regarding outreach to potential declarants	\$550.00	0.2	\$110.00						
8/26/2022	Karen Ellis	Review status of email contact list	\$275.00	0.2	\$55.00						
8/26/2022	Karen Ellis	Review voice message from Pamela Condon	\$275.00	0.2	\$55.00						
8/26/2022	Karen Ellis	Telephone conference with Ms. Condon regarding email address	\$275.00	0.2	\$55.00						
8/29/2022	Karen Ellis	Review email from Julie Haynie regarding status	\$275.00	0.2	\$55.00						
8/30/2022	Karen Ellis	Review status of potential declaration contact information	\$275.00	0.3	\$82.50						
9/8/2022	Karen Ellis	Review calls and emails to be returned	\$275.00	0.8	\$220.00						
9/8/2022	Karen Ellis	Review voice messages and emails regarding status	\$275.00	0.4	\$110.00						
		Conference with Caroline Romeo regarding confidentiality of exhibits concerning her mother and email Mr. Umpierre regarding same	\$550.00	0.3	\$165.00						
9/15/2022	Megan Yarnall	Review correspondence regarding appellate brief	\$550.00	0.2	\$110.00						
9/15/2022	Megan Yarnall	Download pleadings	\$275.00	0.3	\$82.50	0.3	\$ 82.50				
9/19/2022	Karen Ellis	Download pleadings	\$275.00	0.4	\$110.00	0.4	\$ 110.00				
9/20/2022	Karen Ellis	Review notifications from Court of Appeal	\$275.00	0.2	\$55.00						
		Review voice message and email from Stephanie Bobolis regarding parent's residency at Sunrise	\$275.00	0.2	\$55.00						
9/22/2022	Karen Ellis	Email Ms. Ellis regarding motion to keep records underseal	\$550.00	0.2	\$110.00						
9/22/2022	Megan Yarnall	Emails from and to Ms. Yarnall regarding Appellate Sharing Agreement and save agreement to file	\$275.00	0.3	\$82.50						
9/23/2022	Karen Ellis	Email to Ms. Bobolis regarding status of case	\$275.00	0.3	\$82.50						
		Review emails to and from Wendy York regarding status and contact from Mx. SM	\$275.00	0.3	\$82.50						
9/23/2022	Karen Ellis	Conference with Wendy York regarding class member Mx. SM	\$550.00	0.5	\$275.00						
9/23/2022	Megan Yarnall	Emails from Ms. Devine to Ms. Keller regarding call from Mx. SM	\$275.00	0.3	\$82.50						
9/27/2022	Karen Ellis	Locate prior notes regarding prior contact by Mx. SM	\$275.00	0.2	\$55.00						
9/27/2022	Karen Ellis	Review voice messages from putative class members	\$275.00	0.2	\$55.00						

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
9/27/2022	Karen Ellis	Telephone conference with Mx. SM regarding status	\$275.00	0.2	\$55.00								
9/27/2022	Karen Ellis	Update contact recap	\$275.00	0.3	\$82.50								
10/3/2022	Megan Yarnall	Review correspondence regarding appellate briefing	\$550.00	0.2	\$110.00								
10/4/2022	Megan Yarnall	Review correspondence regarding cites to the record	\$550.00	0.2	\$110.00								
10/7/2022	Karen Ellis	Review email from Curt Craton regarding status	\$275.00	0.2	\$55.00								
10/11/2022	Megan Yarnall	Conference with co-counsel regarding appellate briefing strategy and arguments	\$550.00	1.6	\$880.00								
10/12/2022	Karen Ellis	Conference with Ms. Yarnall regarding status of outreach	\$275.00	0.2	\$55.00								
10/12/2022	Karen Ellis	Review voice message from putative class member	\$275.00	0.2	\$55.00								
10/13/2022	Megan Yarnall	Review and reply to correspondence from Mr. Umpierre and Mr. Healey regarding appellate briefing	\$550.00	0.2	\$110.00								
10/14/2022	Megan Yarnall	Conference with Mr. Umpierre regarding appellate briefing	\$550.00	0.3	\$165.00								
10/14/2022	Megan Yarnall	Review emails regarding appellate briefing	\$550.00	0.2	\$110.00								
10/20/2022	Karen Ellis	Save pleadings to file	\$275.00	0.5	\$137.50								
10/24/2022	Megan Yarnall	Review happy camper declaration information for appellate briefing	\$550.00	0.9	\$495.00								
10/26/2022	Megan Yarnall	Review unhappy camper statements, and correspondence and briefing regarding same	\$550.00	3	\$1,650.00								
10/27/2022	Megan Yarnall	Prepare excerpts for appellate brief regarding happy campers	\$550.00	2.2	\$1,210.00								
10/27/2022	Megan Yarnall	Review happy camper statements and email Mr. Healy regarding same	\$550.00	1.1	\$605.00								
10/28/2022	Megan Yarnall	Review and reply to email regarding happy camper statements	\$550.00	0.5	\$275.00								
10/28/2022	Megan Yarnall	Review record and happy camper declarations	\$550.00	4.2	\$2,310.00								
10/30/2022	Megan Yarnall	Review and summarize happy camper declarations	\$550.00	2.1	\$1,155.00								
10/31/2022	Megan Yarnall	Review and summarize happy camper declarations	\$550.00	2.5	\$1,375.00								
11/1/2022	Megan Yarnall	Review and summarize happy camper declarations	\$550.00	2.8	\$1,540.00								
11/6/2022	Megan Yarnall	Review and summarize happy camper declarations	\$550.00	1	\$550.00								
11/9/2022	Megan Yarnall	Conference with co-counsel	\$550.00	1.1	\$605.00								
11/10/2022	Megan Yarnall	Research regarding DSS citations conflicting with civil remedies	\$550.00	1	\$550.00								
11/14/2022	Megan Yarnall	Review and revise appellate brief	\$550.00	1.2	\$660.00								
11/14/2022	Megan Yarnall	Review happy camper declarations	\$550.00	0.5	\$275.00								
11/15/2022	Megan Yarnall	Review and revise appellate brief and email Mr. Healey regarding same	\$550.00	3.4	\$1,870.00								
11/16/2022	Megan Yarnall	Review correspondence	\$550.00	0.2	\$110.00								
11/29/2022	Karen Ellis	Download appellate pleadings	\$275.00	0.3	\$82.50		0.3	\$	82.50				
12/14/2022	Karen Ellis	Review voice message from Paul Scheurman regarding resident Betty Scheurman	\$275.00	0.2	\$55.00								
12/21/2022	Megan Yarnall	Review emails from co counsel regarding happy campers and reply to same	\$550.00	1.1	\$605.00								
12/22/2022	Megan Yarnall	Review and reply to correspondence regarding happy camper declarations	\$550.00	0.3	\$165.00								
12/23/2022	Karen Ellis	Review contact spreadsheet regarding contacts by Happy Campers	\$275.00	0.9	\$247.50								
12/23/2022	Karen Ellis	Review email from Ms. Yarnall regarding Happy Camper declarations	\$275.00	0.3	\$82.50								
12/23/2022	Megan Yarnall	Review and respond to emails regarding contact with happy campers	\$550.00	0.7	\$385.00								
1/27/2023	Karen Ellis	Download and review appellate pleadings	\$350.00	0.5	\$175.00		0.5	\$	175.00				
1/31/2023	Karen Ellis	Download pleadings	\$350.00	0.3	\$105.00		0.3	\$	105.00				
2/3/2023	Karen Ellis	Download pleadings	\$350.00	0.2	\$70.00		0.2	\$	70.00				
2/6/2023	Megan Yarnall	Review correspondence from co-counsel	\$650.00	0.2	\$130.00								
2/7/2023	Karen Ellis	Download pleadings	\$350.00	0.2	\$70.00		0.2	\$	70.00				
3/1/2023	Karen Ellis	Download pleadings	\$350.00	0.3	\$105.00		0.3	\$	105.00				
3/14/2023	Megan Yarnall	Conference with co-counsel regarding potential settlement offer	\$650.00	0.5	\$325.00								
3/21/2023	Karen Ellis	Download pleadings	\$350.00	0.2	\$70.00		0.2	\$	70.00				
3/22/2023	Karen Ellis	Download pleadings	\$350.00	0.2	\$70.00		0.2	\$	70.00				
3/30/2023	Karen Ellis	Discuss case status at team meeting	\$350.00	0.2	\$70.00					0.2	\$	70.00	
3/30/2023	Karen Ellis	Review email from Wendy York regarding status	\$350.00	0.2	\$70.00								
3/31/2023	Karen Ellis	Conference with Ms. Yarnall regarding email from Wendy York	\$350.00	0.2	\$70.00								
3/31/2023	Karen Ellis	Email Ms. York regarding status	\$350.00	0.2	\$70.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
4/1/2023	Megan Yarnall	Read opening appellate brief filed by Sunrise	\$650.00	1	\$650.00								
4/3/2023	Karen Ellis	Review and download pleadings	\$350.00	0.4	\$140.00								
4/5/2023	Karen Ellis	Download and review pleadings	\$350.00	0.3	\$105.00	0.3	\$		105.00				
4/12/2023	Karen Ellis	Download pleadings	\$350.00	0.3	\$105.00	0.3	\$		105.00				
4/12/2023	Karen Ellis	Review email form Mx. SM	\$350.00	0.3	\$105.00								
4/13/2023	Karen Ellis	Discuss case status at team meeting	\$350.00	0.2	\$70.00						0.2	\$	70.00
4/13/2023	Megan Yarnall	Discuss status and court of appeal scheduling with Ms. Ellis and Ms. Humphrey	\$650.00	0.2	\$130.00								
4/13/2023	Megan Yarnall	Humphrey	\$650.00	0.2	\$130.00	0.2	\$		130.00				
4/26/2023	Megan Yarnall	Read appellate briefing	\$650.00	1.2	\$780.00								
4/27/2023	Karen Ellis	Emails from and to Mx. SM regarding status	\$350.00	0.2	\$70.00								
5/1/2023	Karen Ellis	Review court's notice regarding oral argument	\$350.00	0.3	\$105.00								
5/1/2023	Megan Yarnall	Review emails regarding moot appellate arguments	\$650.00	0.2	\$130.00								
5/11/2023	Karen Ellis	Discuss status at team meeting	\$350.00	0.2	\$70.00						0.2	\$	70.00
5/30/2023	Megan Yarnall	Mock oral argument for appeal with co-counsel	\$650.00	1.5	\$975.00								
6/6/2023	Megan Yarnall	Mock oral argument for appeal with co-counsel	\$650.00	1	\$650.00								
6/7/2023	Karen Ellis	Save pleading to file	\$350.00	0.2	\$70.00								
6/14/2023	Megan Yarnall	Mock oral argument for appeal with co-counsel	\$650.00	0.8	\$520.00								
6/14/2023	Megan Yarnall	Review correspondence and notes regarding same	\$650.00	0.4	\$260.00								
6/20/2023	Megan Yarnall	Meeting with co-counsel regarding upcoming oral argument	\$650.00	2	\$1,300.00								
6/20/2023	Megan Yarnall	Travel to Emeryville for meeting with co-counsel	\$650.00	5	\$3,250.00							5	3250
6/22/2023	Megan Yarnall	Drive from bay area home following meeting	\$650.00	5	\$3,250.00								
7/5/2023	Megan Yarnall	Review correspondence, read panel bios for 9th circuit argument	\$650.00	0.4	\$260.00								
7/11/2023	Karen Ellis	Conference with Ms. Yarnall regarding status	\$350.00	0.1	\$35.00								
7/11/2023	Karen Ellis	Review notification from court	\$350.00	0.1	\$35.00								
7/11/2023	Megan Yarnall	Attend oral argument at 9th circuit	\$650.00	2	\$1,300.00								
7/14/2023	Megan Yarnall	Review supplemental authorities filed and cited by Sunrise	\$650.00	0.5	\$325.00								
7/18/2023	Karen Ellis	Download and save pleadings to file	\$350.00	0.2	\$70.00	0.2	\$		70.00				
7/31/2023	Megan Yarnall	Review and reply to correspondence re settlement posture	\$650.00	0.2	\$130.00								
8/2/2023	Karen Ellis	Review appellate court ruling and save ruling to file	\$350.00	0.2	\$70.00								
8/2/2023	Karen Ellis	Review emails re appellate court ruling	\$350.00	0.2	\$70.00								
8/2/2023	Megan Yarnall	Read appellate opinion	\$650.00	0.2	\$130.00								
8/3/2023	Karen Ellis	Review emails	\$350.00	0.2	\$70.00								
8/17/2023	Karen Ellis	Review emails regarding status	\$350.00	0.2	\$70.00								
8/17/2023	Megan Yarnall	Review email re status	\$650.00	0.2	\$130.00								
8/24/2023	Karen Ellis	Email Ms.Yarnall regarding Mandate	\$350.00	0.4	\$140.00								
8/24/2023	Karen Ellis	Emails from and to Ms. Yarnall regarding status and to dos	\$350.00	0.4	\$140.00								
8/24/2023	Megan Yarnall	Review proposed case schedule and letter re discovery	\$650.00	0.3	\$195.00								
8/28/2023	Megan Yarnall	Review email re Case Schedule	\$650.00	0.2	\$130.00								
8/29/2023	Megan Yarnall	Review email re Dr. Kennedy and record collection	\$650.00	0.2	\$130.00								
8/31/2023	Karen Ellis	Discuss case status at team meeting	\$350.00	0.2	\$70.00						0.2	\$	70.00
9/7/2023	Megan Yarnall	Review email from Mr. Healey re Nobee/Ginder Depos	\$650.00	0.2	\$130.00								
9/8/2023	Megan Yarnall	Review emails with co-counsel	\$650.00	0.3	\$195.00								
9/13/2023	Megan Yarnall	Review emails re extending class period	\$650.00	0.2	\$130.00								
9/14/2023	Megan Yarnall	Discuss status and to dos with Ms. Richardson and Ms. Ellis	\$650.00	0.2	\$130.00								
9/15/2023	Megan Yarnall	REview email from Mr. Umpierre re declarants	\$650.00	0.2	\$130.00								
9/21/2023	Megan Yarnall	Draft memo re declarants	\$650.00	0.4	\$260.00								
9/21/2023	Megan Yarnall	Meet with Mr. Umpierre and Mr. Healey	\$650.00	0.4	\$260.00								
9/21/2023	Megan Yarnall	Prepare for meeting re declarants	\$650.00	0.4	\$260.00								
9/22/2023	Karen Ellis	Email to Ms. Yarnall	\$350.00	0.3	\$105.00								
9/22/2023	Karen Ellis	Review email from Ms. Yarnall regarding agenda items	\$350.00	0.3	\$105.00								
9/26/2023	Karen Ellis	Conference with Ms. Yarnall and Ms. Richardson regarding status and work to be completed	\$350.00	0.3	\$105.00	0.3	\$		105.00				
9/26/2023	Megan Yarnall	Discuss status and to-dos with Ms. Ellis and Ms. Richardson	\$650.00	0.2	\$130.00	0.2	\$		130.00				
9/28/2023	Karen Ellis	Review to do list from Ms. Yarnall	\$350.00	0.2	\$70.00	0.2	\$		70.00				

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
9/28/2023	Karen Ellis	Search files and locate documents and items and forward links to Ms. Yarnall	\$350.00	0.6	\$210.00								
9/28/2023	Megan Yarnall	Review correspondence re mediation	\$650.00	0.2	\$130.00								
9/29/2023	Karen Ellis	Review notes and documents regarding status and issue of payment to facilities	\$350.00	1.6	\$560.00								
10/3/2023	Karen Ellis	Conference with Ms. Yarnall re abitation and declarants	\$350.00	0.4	\$140.00								
10/3/2023	Karen Ellis	Review documents regarding status of arbitration agreements signed by declarants	\$350.00	1	\$350.00								
10/4/2023	Karen Ellis	Review email from Mr. Healey	\$350.00	0.2	\$70.00								
10/4/2023	Karen Ellis	Prepare for and attend Zoom meeting with team regarding outreach	\$350.00	0.9	\$315.00								
10/4/2023	Karen Ellis	Review status of prior outreaches	\$350.00	0.6	\$210.00			0.9	\$	315.00			
10/4/2023	Megan Yarnall	Discuss with Ms. Ellis, Mr. Umpierre, and Mr. Healey	\$650.00	0.4	\$260.00								
10/4/2023	Megan Yarnall	Emails re next outreach	\$650.00	0.2	\$130.00								
10/4/2023	Megan Yarnall	Prepare plan for next outreach	\$650.00	0.8	\$520.00								
10/4/2023	Megan Yarnall	Review past outreach efforts to class members	\$650.00	1.1	\$715.00								
10/5/2023	Karen Ellis	Review prior notes	\$350.00	0.5	\$175.00								
10/9/2023	Karen Ellis	Review and organize notes from 2022 outreach	\$350.00	5.2	\$1,820.00								
10/10/2023	Karen Ellis	work on spreadsheet of class members not yet contacted	\$350.00	1.8	\$630.00								
10/11/2023	Karen Ellis	Organize documents and emails	\$350.00	0.5	\$175.00								
10/11/2023	Karen Ellis	Work on contact spread sheet	\$350.00	2.8	\$980.00								
10/15/2023	Megan Yarnall	Review and respond to emails re mediation	\$650.00	0.2	\$130.00								
10/16/2023	Karen Ellis	Complete spreadsheet for persons to contact	\$350.00	4	\$1,400.00								
10/16/2023	Karen Ellis	Conference with Ms. Yarnall regarding status	\$350.00	0.2	\$70.00								
10/16/2023	Megan Yarnall	Email Mr. Umpierre re: class list	\$650.00	0.1	\$65.00								
10/16/2023	Megan Yarnall	Review correspondence from defendants re discovery	\$650.00	0.1	\$65.00								
10/17/2023	Karen Ellis	Conference with Ms. Yarnall regarding status and mediation	\$350.00	0.2	\$70.00								
10/17/2023	Karen Ellis	Review and organize documents from class members	\$350.00	0.3	\$105.00								
10/17/2023	Karen Ellis	Review emails regarding status of updated class list	\$350.00	0.3	\$105.00								
10/18/2023	Karen Ellis	Search Skilled Healthcare Class Action case to locate pleadings regarding admissibility of California Department of Public Health records and forward to Ms. Yarnall	\$350.00	0.7	\$245.00								
10/23/2023	Megan Yarnall	Review correspondence re sunrise financial and business changes	\$650.00	0.2	\$130.00								
10/24/2023	Karen Ellis	Review email from Mr. Healey	\$350.00	0.3	\$105.00								
10/26/2023	Karen Ellis	Discuss status at team meeting	\$350.00	0.3	\$105.00			0.3	\$	105.00			
10/26/2023	Megan Yarnall	Discuss case status with Ms. Ellis and Ms. Richardson	\$650.00	0.2	\$130.00			0.2	\$	130.00			
11/1/2023	Karen Ellis	Review emails regarding class list and phone conference and review attachments	\$350.00	0.4	\$140.00								
11/2/2023	Karen Ellis	Conference with Ms. Yarnall	\$350.00	0.3	\$105.00								
11/3/2023	Karen Ellis	Review to do list from Mr. Healey	\$350.00	0.2	\$70.00								
11/3/2023	Karen Ellis	Email updated questionnaire and contact list to Ms. Yarnall for status meeting	\$350.00	0.3	\$105.00								
11/3/2023	Megan Yarnall	Attend team meeting phone conference	\$650.00	1.1	\$715.00			1.1	\$	715.00			
11/3/2023	Megan Yarnall	Discuss with Ms. Ellis	\$650.00	0.2	\$130.00								
11/6/2023	Frank Martin	Email Ms. Yarnall about Sanchez case and possible hearsay issues	\$400.00	0.7	\$280.00			0.7	\$	280.00			
11/6/2023	Frank Martin	Review motion in limine for shepardizing	\$400.00	0.5	\$200.00			0.5	\$	200.00			
11/6/2023	Megan Yarnall	Emails with cocounsel re Sunrise - Class Member outreach	\$650.00	0.2	\$130.00								
11/7/2023	Frank Martin	Shepardize old motion in limine for Ms. Yarnall	\$400.00	1.5	\$600.00			1.5	\$	600.00			
11/7/2023	Karen Ellis	Attend telephone conference with Mr. Marks and Ms. Yarnall	\$350.00	0.5	\$175.00								
11/7/2023	Karen Ellis	Prepare for telephone conference with Mr. Marks	\$350.00	1.4	\$490.00								
11/7/2023	Karen Ellis	Review emails re witness interviews	\$350.00	0.2	\$70.00								
11/7/2023	Karen Ellis	Review interview notes	\$350.00	0.3	\$105.00								
11/7/2023	Megan Yarnall	Phone conference with Ms. Ellis and David Marks re witness statements and videos	\$650.00	0.5	\$325.00								

Fees

Date	Time Keeper	Task Description	Hourly	Hours	Fee (Rate x Hours)	Lodestar Reductions		CC Confs	Falkenberg	Travel	
			Rate	worked		General	Fees				
			Hrs			Hrs	Fees	Hrs	Fees	Hrs	Fees
		Review 2020 declarations for content and make list of those to forward to Mr. Marks	\$350.00	2.9	\$1,015.00						
11/8/2023	Karen Ellis	Review notes from 2022 outreach and categorize for call backs	\$350.00	2.1	\$735.00						
11/8/2023	Karen Ellis	Revise intake template and forward to Ms. Yarnall	\$350.00	0.3	\$105.00						
11/8/2023	Megan Yarnall	Discuss interviews with with Ms. Ellis	\$650.00	0.2	\$130.00						
11/8/2023	Megan Yarnall	Review intake form and email same to Mr. Marks	\$650.00	0.2	\$130.00						
11/9/2023	Karen Ellis	Conference with Ms. Yarnall regarding status	\$350.00	0.2	\$70.00						
11/9/2023	Karen Ellis	Forward 2020 declarations to Ms. Yarnall	\$350.00	0.2	\$70.00						
11/9/2023	Megan Yarnall	Review and respond to emails re: former employees and potential witnesses	\$650.00	0.7	\$455.00						
11/10/2023	Karen Ellis	Email Mr. Marks forwarding 2020 declarations via ShareFile	\$350.00	0.3	\$105.00						
11/13/2023	Karen Ellis	Attend telephone conference with Mr. Marks	\$350.00	0.2	\$70.00						
11/13/2023	Karen Ellis	Call class members to schedule telephone conferences	\$350.00	1.1	\$385.00						
11/13/2023	Karen Ellis	Emails from and to Investigator Harry Fleming	\$350.00	0.5	\$175.00						
11/13/2023	Karen Ellis	Emails from and to Mr. Marks regarding telephone conference	\$350.00	0.3	\$105.00						
11/13/2023	Karen Ellis	Emails to and from Ms. Yarnall regarding status	\$350.00	0.3	\$105.00						
11/13/2023	Karen Ellis	Prioritize and organize notes from 2022 outreach	\$350.00	1.1	\$385.00						
11/13/2023	Karen Ellis	Review email from Mr. Healey regarding video edits	\$350.00	0.2	\$70.00						
11/13/2023	Karen Ellis	ShareFile additional declarations to Mr. Marks	\$350.00	0.5	\$175.00						
11/14/2023	Karen Ellis	Emails to and from class members regarding documents	\$350.00	1.1	\$385.00						
11/14/2023	Karen Ellis	Telephone conferences with class members to complete intake questionnaires	\$350.00	5.2	\$1,820.00						
11/15/2023	Karen Ellis	Telephone conference with Investigator Harry Fleming	\$350.00	0.3	\$105.00						
11/15/2023	Karen Ellis	Telephone conferences with class members	\$350.00	4.2	\$1,470.00						
11/15/2023	Karen Ellis	Type up interview questionnaires from notes	\$350.00	1.1	\$385.00						
11/16/2023	Karen Ellis	Emails to and from Mr. Marks and Mr. Fleming	\$350.00	0.4	\$140.00						
11/16/2023	Karen Ellis	Telephone conferences with class members	\$350.00	5.8	\$2,030.00						
11/17/2023	Karen Ellis	Emails from and to Ms. Helenih; review and respond to email from Mr. Healey	\$350.00	0.4	\$140.00						
11/17/2023	Karen Ellis	ShareFile completed questionnaires to Mr. Marks and Mr. Fleming	\$350.00	0.4	\$140.00						
11/17/2023	Karen Ellis	Telephone conferences with class members	\$350.00	5.6	\$1,960.00						
11/17/2023	Karen Ellis	Type up interview questionnaires	\$350.00	0.8	\$280.00						
11/20/2023	Karen Ellis	Emails from and to Mr. Marks regarding status and additional information from questionnaires	\$350.00	0.3	\$105.00						
11/20/2023	Karen Ellis	Telephone conferences with class members	\$350.00	7	\$2,450.00						
11/20/2023	Megan Yarnall	Discuss class member outreach with Ms. Ellis	\$650.00	0.3	\$195.00						
11/21/2023	Karen Ellis	Emails to and from Class Members	\$350.00	1.1	\$385.00						
11/21/2023	Karen Ellis	Telephone conferences with Class Members	\$350.00	5.5	\$1,925.00						
11/21/2023	Karen Ellis	Texts to and from Mr. Fleming	\$350.00	0.3	\$105.00						
11/21/2023	Karen Ellis	Type up intakes and forward to Mr. Marks and Mr. Fleming	\$350.00	0.5	\$175.00						
11/22/2023	Karen Ellis	Emails to and from Class Members	\$350.00	0.6	\$210.00						
11/22/2023	Karen Ellis	Emails to and from Mr. Fleming regarding prior Sunrise "Happy Camper"	\$350.00	0.4	\$140.00						
11/22/2023	Karen Ellis	Review key video questions from Mr. Fleming and forward to Ms. Yarnall	\$350.00	0.3	\$105.00						
11/22/2023	Karen Ellis	Review notes from prior contacts with Class Members to prioritize contacts	\$350.00	0.8	\$280.00						
11/22/2023	Karen Ellis	Telephone conferences with Class Members	\$350.00	4.5	\$1,575.00						
11/22/2023	Karen Ellis	Texts to and from Mr. Fleming	\$350.00	0.3	\$105.00						
11/22/2023	Karen Ellis	Type up intakes and forward to Mr. Marks and Mr. Fleming	\$350.00	0.7	\$245.00						
11/22/2023	Megan Yarnall	Email Mr. Healey re Philadelphia mediation	\$650.00	0.2	\$130.00						
11/24/2023	Karen Ellis	Email Mr. Castro-Blanco forwarding copy of second amended complaint	\$350.00	0.2	\$70.00						
11/24/2023	Karen Ellis	Emails to and from Mr. Fleming	\$350.00	0.2	\$70.00						
11/24/2023	Karen Ellis	Save documents provided by Mx. ED and attached to intake form	\$350.00	0.2	\$70.00						
11/24/2023	Karen Ellis	ShareFile Mx. ED intake form to Mr. Marks and Mr. Fleming	\$350.00	0.2	\$70.00						

Fees

Date	Time Keeper	Task Description	Hourly	Hours	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
			Rate	worked		General Hrs	Fees						
11/28/2023	Karen Ellis	Download and forward notes from journal from Penny Helenihi to Mr. Marks and Mr. Fleming	\$350.00	0.5	\$175.00								
11/28/2023	Karen Ellis	Emails from and to Mr. Marks	\$350.00	0.2	\$70.00								
11/28/2023	Karen Ellis	Emails to and from Class Members	\$350.00	0.7	\$245.00								
11/28/2023	Karen Ellis	Review witness worksheet	\$350.00	0.3	\$105.00								
11/28/2023	Karen Ellis	Telephone conferences with Class Members	\$350.00	4.1	\$1,435.00								
11/29/2023	Karen Ellis	Review and edit witness worksheet	\$350.00	0.2	\$70.00								
11/29/2023	Karen Ellis	Review notes from previous contacts with class members	\$350.00	0.5	\$175.00								
11/29/2023	Karen Ellis	Telephone conference with class member	\$350.00	3.7	\$1,295.00								
11/29/2023	Karen Ellis	Telephone conference with Mr. Fleming regarding status	\$350.00	0.2	\$70.00								
11/30/2023	Karen Ellis	Conference with Ms. Yarnall	\$350.00	0.2	\$70.00								
11/30/2023	Karen Ellis	Further review of note of telephone conferences with class members	\$350.00	1.8	\$630.00								
11/30/2023	Karen Ellis	Review email from Mr. Healey regarding witness videos	\$350.00	0.2	\$70.00								
12/1/2023	Karen Ellis	Respond to emails from class members	\$350.00	0.8	\$280.00								
12/1/2023	Karen Ellis	Review class list against class members recently contacted	\$350.00	0.6	\$210.00								
12/1/2023	Karen Ellis	Type up intake questionnaires	\$350.00	2.9	\$1,015.00								
12/4/2023	Karen Ellis	Conference with Ms. Yarnall	\$350.00	0.2	\$70.00								
12/4/2023	Karen Ellis	Email Ms. Geving	\$350.00	0.2	\$70.00								
12/4/2023	Karen Ellis	Review documents from JoAnn Geving	\$350.00	0.5	\$175.00								
12/4/2023	Karen Ellis	Review email from Mr. Healey and attached trial preparation agenda	\$350.00	0.3	\$105.00								
12/4/2023	Karen Ellis	Work on class member contacts and interviews	\$350.00	2.6	\$910.00								
12/4/2023	Megan Yarnall	Review emails re trial prep meeting and prepare for same	\$650.00	0.5	\$325.00								
12/5/2023	Karen Ellis	Emails from and to Ms. Yarnall regarding witness contacts	\$350.00	0.4	\$140.00								
12/5/2023	Karen Ellis	Update witness spreadsheet to include notes regarding each witness contact	\$350.00	4.8	\$1,680.00								
12/5/2023	Megan Yarnall	Prepare for trial prep meetings including reading trial briefs, reviewing DSS summaries and class member interviews	\$650.00	3.5	\$2,275.00								
12/5/2023	Megan Yarnall	Travel from Eureka to Fredricksburg TX	\$650.00	7	\$4,550.00							7	4550
12/5/2023	Megan Yarnall	Trial prep meetings	\$650.00	1.5	\$975.00								
12/6/2023	Karen Ellis	Attempt to contact Ms. Brookstore	\$350.00	0.2	\$70.00								
12/6/2023	Karen Ellis	Emails from and to Mr. Fleming regarding contacting Ms. Brookstore	\$350.00	0.3	\$105.00								
12/6/2023	Karen Ellis	Prepare additional notes regarding telephone contacts with class representatives	\$350.00	3.9	\$1,365.00								
12/6/2023	Megan Yarnall	Trial prep meetings	\$650.00	9	\$5,850.00								
12/7/2023	Karen Ellis	Review emails regarding new email for mass outreach	\$350.00	0.4	\$140.00								
12/7/2023	Karen Ellis	Scan and email notes regarding intakes to Ms. Yarnall	\$350.00	0.4	\$140.00								
12/7/2023	Karen Ellis	Telephone conference with Michael Brookstore	\$350.00	1.1	\$385.00								
12/7/2023	Karen Ellis	Telephone conference with Vickie Belter	\$350.00	0.9	\$315.00								
12/7/2023	Karen Ellis	Texts from and to Mr. Fleming regarding status of client interviews and clips	\$350.00	0.3	\$105.00								
12/7/2023	Karen Ellis	Type up additional intake questionnaires and forward to Mr. Marks and Mr. Fleming	\$350.00	0.7	\$245.00								
12/7/2023	Megan Yarnall	Trial Prep meetings	\$650.00	8	\$5,200.00								
12/8/2023	Megan Yarnall	Travel from Fredricksburg TX to Eureka	\$650.00	10	\$6,500.00							10	6500
12/11/2023	Karen Ellis	Conference with Ms. Yarnall regarding status	\$350.00	0.2	\$70.00								
12/11/2023	Karen Ellis	Draft and review additional notes regarding prior contacts from class members	\$350.00	2.8	\$980.00								
12/11/2023	Karen Ellis	Review emails regarding status of new email address for email outreach	\$350.00	0.2	\$70.00								
12/11/2023	Megan Yarnall	Review and respond to emails re class list and happy campers	\$650.00	0.2	\$130.00								
12/12/2023	Frank Martin	Strategize with partners during big case meeting	\$400.00	0.4	\$160.00	0.4	\$	160.00					
12/12/2023	Karen Ellis	Review language for outreach to class members	\$350.00	0.2	\$70.00								
12/12/2023	Karen Ellis	Work on class member outreach	\$350.00	2.6	\$910.00								
12/12/2023	Megan Yarnall	Discuss with Ms. Ellis	\$650.00	0.2	\$130.00								
12/12/2023	Megan Yarnall	Draft email to whole class and email co-counsel re same	\$650.00	0.4	\$260.00								

Fees

Date	Time Keeper	Task Description	Hourly	Hours	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
			Rate	worked		General Hrs	Fees						
12/13/2023	Karen Ellis	Conference with Mr. Needham regarding status	\$350.00	0.2	\$70.00								
12/13/2023	Karen Ellis	Conference with Ms. Yarnall regarding status	\$350.00	0.4	\$140.00								
12/13/2023	Karen Ellis	Review emails regarding documents	\$350.00	0.2	\$70.00								
12/13/2023	Megan Yarnall	Analyze class list data, happy camper declarations, and census information	\$650.00	4.1	\$2,665.00								
12/13/2023	Megan Yarnall	Draft and revise outreach email	\$650.00	0.5	\$325.00								
12/13/2023	Megan Yarnall	Prepare class list for email outreach	\$650.00	1.7	\$1,105.00								
12/14/2023	Karen Ellis	Attempts to contact Mx. MW	\$350.00	0.2	\$70.00								
12/14/2023	Karen Ellis	Review emails regarding class member outreach	\$350.00	0.2	\$70.00								
12/14/2023	Karen Ellis	Review voice message from Mx. MW	\$350.00	0.2	\$70.00								
12/14/2023	Megan Yarnall	Prepare email to class and prepare outreach list	\$650.00	1.2	\$780.00								
12/15/2023	Karen Ellis	Emails from and to Mx. PM regarding email requesting records	\$350.00	0.3	\$105.00								
12/15/2023	Karen Ellis	Telephone conference with Mx. MW regarding mother's residency at Sunrise and to schedule telephone conference with Mx. MW and her sister	\$350.00	0.7	\$245.00								
12/15/2023	Megan Yarnall	Send and reply to class member emails looking for written complaints	\$650.00	2	\$1,300.00								
12/17/2023	Megan Yarnall	Review and respond to emails from class members re: outreach	\$650.00	3	\$1,950.00								
12/18/2023	Karen Ellis	Conference with Ms. Yarnall regarding status	\$350.00	0.2	\$70.00								
12/18/2023	Karen Ellis	Review email responses from class members	\$350.00	0.3	\$105.00								
12/18/2023	Karen Ellis	Save Ms. Geving's documents to file and forward to Ms. Yarnall	\$350.00	0.3	\$105.00								
12/18/2023	Karen Ellis	Telephone conference with JoAnn Geving	\$350.00	0.8	\$280.00								
12/18/2023	Karen Ellis	Texts from and to Mx. MW delaying telephone conference until after first of year	\$350.00	0.2	\$70.00								
12/18/2023	Megan Yarnall	Review and respond to emails from class members	\$650.00	3	\$1,950.00								
12/19/2023	Karen Ellis	Emails to and from class members and telephone conference with class members regarding responses to email outreach	\$350.00	4.7	\$1,645.00								
12/19/2023	Karen Ellis	Emails to and from Mr. Fleming	\$350.00	0.3	\$105.00								
12/19/2023	Karen Ellis	Telephone conference with Mr. Fleming regarding status	\$350.00	0.2	\$70.00								
12/19/2023	Megan Yarnall	Discuss same with Ms. Ellis	\$650.00	0.2	\$130.00								
12/19/2023	Megan Yarnall	Emails with class members	\$650.00	3.1	\$2,015.00								
12/19/2023	Megan Yarnall	Emails with team re: potential trial witnesses and video interviews	\$650.00	0.2	\$130.00								
12/20/2023	Karen Ellis	Emails to and from class members and telephone conference with class members regarding responses to email outreach	\$350.00	4.9	\$1,715.00								
12/20/2023	Karen Ellis	Texts to and from Mr. Fleming; conference with Ms. Yarnall	\$350.00	0.3	\$105.00								
12/20/2023	Megan Yarnall	Emails with class members and emails to team re: same	\$650.00	3.2	\$2,080.00								
12/20/2023	Megan Yarnall	Read draft mediation brief	\$650.00	1.1	\$715.00								
12/21/2023	Karen Ellis	Emails to and from class members and telephone conference with class members regarding responses to email outreach	\$350.00	4.1	\$1,435.00								
12/21/2023	Karen Ellis	Emails to and from team regarding telephone conference with Mx. WY	\$350.00	0.3	\$105.00								
12/21/2023	Karen Ellis	Text Mr. Fleming re Mx. WY	\$350.00	0.2	\$70.00								
12/21/2023	Megan Yarnall	Discuss outreach and interviews Ms. Ellis	\$650.00	0.2	\$130.00								
12/21/2023	Megan Yarnall	Emails with class members	\$650.00	2.6	\$1,690.00								
12/21/2023	Megan Yarnall	Emails with team re class outreach	\$650.00	0.2	\$130.00								
12/21/2023	Megan Yarnall	Review and summarize DSS documents	\$650.00	3	\$1,950.00								
12/22/2023	Karen Ellis	Outreach to class members	\$350.00	1.8	\$630.00								
12/22/2023	Karen Ellis	Review and organize messages and documents re outreach	\$350.00	0.4	\$140.00								
12/22/2023	Megan Yarnall	Review and summarize DSS complaints and citations for all facilities	\$650.00	6.2	\$4,030.00								
12/23/2023	Megan Yarnall	Review and summarize DSS citation and complaint data	\$650.00	2.5	\$1,625.00								
12/23/2023	Megan Yarnall	Review and summarize DSS records	\$650.00	0.7	\$455.00								
12/24/2023	Megan Yarnall	Review and summarize DSS records	\$650.00	1.9	\$1,235.00								
12/26/2023	Karen Ellis	Emails to and from class members	\$350.00	0.6	\$210.00								
12/26/2023	Karen Ellis	Preparation of December 2023 class member outreach status spreadsheet	\$350.00	2.1	\$735.00								
12/26/2023	Megan Yarnall	Draft exhibits for mediation brief	\$650.00	1.2	\$780.00								

Fees

Date	Time Keeper	Task Description	Hourly	Hours	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
			Rate	worked		General Hrs	Fees						
12/26/2023	Megan Yarnall	Draft mediation brief	\$650.00	1.1	\$715.00								
12/26/2023	Megan Yarnall	Review and summarize DSS citations	\$650.00	1.2	\$780.00								
12/27/2023	Karen Ellis	Edit class member outreach status spreadsheet	\$350.00	0.8	\$280.00								
12/27/2023	Karen Ellis	Emails to and from class members	\$350.00	2.5	\$875.00								
12/27/2023	Megan Yarnall	Review and reply to emails from class members and email Ms. Ellis re same	\$650.00	1	\$650.00								
12/28/2023	Karen Ellis	Edit class member outreach status spreadsheet	\$350.00	0.2	\$70.00								
12/28/2023	Karen Ellis	Emails to and from class members	\$350.00	0.2	\$70.00								
12/28/2023	Karen Ellis	Telephone conferences with class members	\$350.00	0.5	\$175.00								
12/29/2023	Karen Ellis	Emails from and to Ms. Yarnall	\$350.00	0.2	\$70.00								
12/29/2023	Karen Ellis	Review and organize emails from class members	\$350.00	0.6	\$210.00								
12/29/2023	Megan Yarnall	Reply to emails from class members	\$650.00	0.6	\$390.00								
1/2/2024	Karen Ellis	Edit class member outreach status spreadsheet	\$350.00	0.3	\$105.00								
1/2/2024	Karen Ellis	Emails to class members	\$350.00	2.8	\$980.00								
1/2/2024	Karen Ellis	Organize emails from class members and save documents to folders	\$350.00	0.2	\$70.00								
1/2/2024	Megan Yarnall	Correspond with team re class member emails	\$650.00	0.2	\$130.00								
1/2/2024	Megan Yarnall	Read final mediation brief	\$650.00	2	\$1,300.00								
1/2/2024	Megan Yarnall	Respond to class members emails	\$650.00	0.9	\$585.00								
1/3/2024	Karen Ellis	Edit class member outreach status spreadsheet	\$350.00	0.3	\$105.00								
1/3/2024	Karen Ellis	Emails to and from class members	\$350.00	2.9	\$1,015.00								
1/3/2024	Karen Ellis	Organize emails from class members and save documents to folders	\$350.00	0.4	\$140.00								
1/3/2024	Karen Ellis	Review email from Mr. Fleming regarding status of video clips	\$350.00	0.2	\$70.00								
1/3/2024	Karen Ellis	Review emails regarding additional class representatives	\$350.00	0.2	\$70.00								
1/3/2024	Megan Yarnall	Correspond with team re contacts with class members	\$650.00	0.3	\$195.00								
1/3/2024	Megan Yarnall	Discuss same with Ms. Ellis	\$650.00	0.1	\$65.00								
1/3/2024	Megan Yarnall	Emails with Mr. Healey re additional class reps	\$650.00	0.1	\$65.00								
1/3/2024	Megan Yarnall	Respond to class member emails	\$650.00	1.3	\$845.00								
1/4/2024	Karen Ellis	Edit class member outreach status spreadsheet	\$350.00	0.4	\$140.00								
1/4/2024	Karen Ellis	Emails to and from class members	\$350.00	2.8	\$980.00								
1/4/2024	Karen Ellis	Organize emails from class members and save documents to folders	\$350.00	0.2	\$70.00								
1/4/2024	Karen Ellis	Prepare and finalize list of payors for 2022-2023 outreach and forward to Ms. Yarnall	\$350.00	0.4	\$140.00								
1/4/2024	Megan Yarnall	Discuss other payors issue with Ms. Ellis	\$650.00	0.2	\$130.00								
1/4/2024	Megan Yarnall	Discuss status and to dos with Ms. Richardson and Ms. Ellis	\$650.00	0.2	\$130.00	0.2	\$	130.00					
1/4/2024	Megan Yarnall	Emails with class members	\$650.00	0.8	\$520.00								
1/4/2024	Megan Yarnall	Emails with team re upcoming mediation	\$650.00	0.2	\$130.00								
1/4/2024	Megan Yarnall	Review correspondence re other payors	\$650.00	0.2	\$130.00								
1/5/2024	Karen Ellis	Edit class member outreach status spreadsheet to include additional information requested by Mr. Healey	\$350.00	0.4	\$140.00								
1/5/2024	Karen Ellis	Emails to and from class members	\$350.00	2.6	\$910.00								
1/5/2024	Karen Ellis	Forward revised status list to Ms. Yarnall	\$350.00	0.2	\$70.00								
1/5/2024	Karen Ellis	Organize emails from class members and save documents to folders	\$350.00	0.3	\$105.00								
1/5/2024	Karen Ellis	Review class list to locate additional information	\$350.00	0.5	\$175.00								
1/5/2024	Karen Ellis	Review email regarding Happy Campers	\$350.00	0.2	\$70.00								
1/5/2024	Megan Yarnall	Call with team re mediation	\$650.00	0.8	\$520.00			0.8	\$	520.00			
1/5/2024	Megan Yarnall	Email Mr. Marks re DSS citations	\$650.00	0.2	\$130.00								
1/5/2024	Megan Yarnall	Email team re: happy campers we have interviewed	\$650.00	0.2	\$130.00								
1/5/2024	Megan Yarnall	Emails with class members	\$650.00	0.5	\$325.00								
1/5/2024	Megan Yarnall	Emails with team re mediation	\$650.00	0.5	\$325.00								
1/5/2024	Megan Yarnall	Read defense mediation brief	\$650.00	1.9	\$1,235.00								
1/6/2024	W. Timothy Needham	Research present financial status of Sunrise, Revera and Welltower. (2.0 hours written off)	\$895.00	1.8	\$1,611.00								
1/6/2024	W. Timothy Needham	Review email from Attorney Healey re corporate structure	\$895.00	0.2	\$179.00								
1/7/2024	Karen Ellis	Email Ms. Yarnall re class member emails	\$350.00	0.2	\$70.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
1/7/2024	Karen Ellis	Review additional emails from class members and add to contact status list	\$350.00	0.3	\$105.00								
1/8/2024	Karen Ellis	Conference with Ms. Yarnall regarding mediation	\$350.00	0.3	\$105.00								
1/8/2024	Karen Ellis	Respond to emails and telephone calls from class members	\$350.00	1.1	\$385.00								
1/8/2024	Megan Yarnall	Mediation prep and emails re same	\$650.00	2	\$1,300.00								
1/9/2024	Karen Ellis	Review emails and save to file	\$350.00	0.6	\$210.00								
1/9/2024	Megan Yarnall	Mediation prep	\$650.00	1.9	\$1,235.00								
1/9/2024	Megan Yarnall	Meet with team re Mediation prep	\$650.00	0.6	\$390.00			0.6	\$ 390.00				
1/9/2024	Megan Yarnall	Prepare for mediation	\$650.00	4	\$2,600.00								
1/9/2024	Megan Yarnall	Travel to Philadelphia for mediation	\$650.00	6	\$3,900.00							6	3900
1/10/2024	Karen Ellis	Emails from and to class members	\$350.00	0.7	\$245.00								
1/10/2024	Karen Ellis	Telephone conference with Cindy Albright regarding mother's residency at Alta Loma	\$350.00	1.3	\$455.00								
1/10/2024	Megan Yarnall	Prepare for mediation and attend mediation	\$650.00	10	\$6,500.00								
1/11/2024	Megan Yarnall	Prepare for and attend mediation	\$650.00	7.5	\$4,875.00								
1/12/2024	Megan Yarnall	Review worksheet re mediator's proposal compared to other class settlements	\$650.00	0.3	\$195.00								
1/16/2024	Megan Yarnall	Reply to class member emails	\$650.00	0.4	\$260.00								
1/16/2024	Megan Yarnall	Review and respond to emails re mediator's proposal	\$650.00	0.2	\$130.00								
1/17/2024	Karen Ellis	Respond to calls and emails	\$350.00	1.6	\$560.00								
1/17/2024	Karen Ellis	Review and save documents and emails from class members to file	\$350.00	0.2	\$70.00								
1/17/2024	Karen Ellis	Update contact status list	\$350.00	0.4	\$140.00								
1/17/2024	Megan Yarnall	Phone conference with team re settlement proposal	\$650.00	0.2	\$130.00			0.2	\$ 130.00				
1/17/2024	Megan Yarnall	Travel home from mediation	\$650.00	10	\$6,500.00							10	6500
1/18/2024	Karen Ellis	Review status of mediation and settlement at team meeting	\$350.00	0.4	\$140.00								
1/19/2024	Karen Ellis	Respond to class member calls and emails	\$350.00	0.5	\$175.00								
1/22/2024	Karen Ellis	Locate and forward prior brief to Mr. Healey	\$350.00	0.2	\$70.00								
1/22/2024	Karen Ellis	Review emails regarding briefing regarding fee multiplier	\$350.00	0.2	\$70.00								
1/22/2024	Megan Yarnall	Review and respond to emails re DSS citation data	\$650.00	0.2	\$130.00								
1/23/2024	Megan Yarnall	Review emails re injunction	\$650.00	0.2	\$130.00								
1/25/2024	Karen Ellis	Telephone conference with Jane Kraemer regarding Sunrise Huntington Beach	\$350.00	0.8	\$280.00								
1/25/2024	Megan Yarnall	Emails and phone call with Mr. Umpierre re same	\$650.00	0.4	\$260.00								
1/25/2024	Megan Yarnall	Review correspondence re settlement discussion status	\$650.00	0.2	\$130.00								
1/25/2024	Megan Yarnall	Work with DSS citation and complaint data for class period position statement	\$650.00	1.1	\$715.00								
1/26/2024	Karen Ellis	Review emails	\$350.00	0.2	\$70.00								
1/26/2024	Megan Yarnall	Emails with class members	\$650.00	0.5	\$325.00								
1/29/2024	Karen Ellis	Organize class member notes and documents into categories	\$350.00	2.2	\$770.00								
1/29/2024	Megan Yarnall	Review and reply to team email	\$650.00	0.2	\$130.00								
1/30/2024	Megan Yarnall	Review and reply to emails re injunction	\$650.00	0.2	\$130.00								
1/31/2024	Karen Ellis	Telephone conference with class member Tracy Myers	\$350.00	0.6	\$210.00								
2/1/2024	Karen Ellis	Review emails	\$350.00	0.2	\$70.00								
2/1/2024	Karen Ellis	Review status at team meeting	\$350.00	0.2	\$70.00								
2/1/2024	Megan Yarnall	Discuss status with Ms. Ellis and AH	\$650.00	0.2	\$130.00	0.2	\$ 130.00	0.2	\$ 130.00				
2/1/2024	Megan Yarnall	Review edits to draft injunction and correspondence re same	\$650.00	0.3	\$195.00								
2/2/2024	Karen Ellis	Review emails	\$350.00	0.4	\$140.00								
2/2/2024	Megan Yarnall	Review draft injunction	\$650.00	0.6	\$390.00								
2/2/2024	Megan Yarnall	Team call re injunction	\$650.00	0.2	\$130.00								
2/5/2024	Karen Ellis	Conference with Ms. Yarnall	\$350.00	0.2	\$70.00								
2/5/2024	Karen Ellis	Emails from and to JoAnn Geving regarding status	\$350.00	0.2	\$70.00								
2/5/2024	Megan Yarnall	Review emails re injunction	\$650.00	0.2	\$130.00								
2/6/2024	Karen Ellis	Review and save emails from class members	\$350.00	0.9	\$315.00								
2/6/2024	Karen Ellis	Save documents from class members to file	\$350.00	0.2	\$70.00								

Fees

Date	Time Keeper	Task Description	Hourly	Hours	Fee (Rate x Hours)	<u>Lodestar Reductions</u>		CC Confs	Falkenberg	Travel	
			Rate	worked		General	Fees				
						Hrs	Fees	Hrs	Fees	Hrs	Fees
2/6/2024	Karen Ellis	Update class member contact status list	\$350.00	0.2	\$70.00						
2/8/2024	Karen Ellis	Review emails from class members	\$350.00	0.3	\$105.00						
2/13/2024	Karen Ellis	Download and review Order regarding class period	\$350.00	0.3	\$105.00	0.3	\$ 105.00				
2/13/2024	Karen Ellis	Review emails and outreaches from class members	\$350.00	0.4	\$140.00						
2/16/2024	Karen Ellis	Review email from class member and Ms. Yarnall's response	\$350.00	0.2	\$70.00						
2/16/2024	Karen Ellis	Review emails regarding settlement	\$350.00	0.2	\$70.00						
2/16/2024	Karen Ellis	Review status at team meeting	\$350.00	0.2	\$70.00			0.2	\$ 70.00		
2/16/2024	Megan Yarnall	Emails with class members	\$650.00	0.2	\$130.00						
2/16/2024	Megan Yarnall	Read emails re injunction negotiation	\$650.00	0.2	\$130.00						
2/16/2024	Megan Yarnall	Read emails re settlement!	\$650.00	0.2	\$130.00						
2/28/2024	Karen Ellis	Review email from Gary Zenbow	\$350.00	0.2	\$70.00						
		Review email from Ms. Healey regarding suggested responses to class									
2/28/2024	Karen Ellis	member contacts regarding status	\$350.00	0.2	\$70.00						
2/28/2024	Megan Yarnall	Email class members	\$650.00	0.2	\$130.00						
2/28/2024	Megan Yarnall	Emails re Draft Settlement Documentation	\$650.00	0.2	\$130.00						
3/4/2024	Megan Yarnall	Review status and related emails	\$650.00	0.3	\$195.00						
3/5/2024	Karen Ellis	Review email from class member Pamela Condon	\$350.00	0.2	\$70.00						
3/14/2024	Karen Ellis	Discuss status at team meeting	\$350.00	0.2	\$70.00			0.2	\$ 70.00		
3/14/2024	Karen Ellis	Review email regarding settlement	\$350.00	0.2	\$70.00						
		Review correspondence re settlement and briefing outline and discuss same									
3/14/2024	Megan Yarnall	with team	\$650.00	0.3	\$195.00			0.3	\$ 195.00		
3/18/2024	Karen Ellis	Review current class member list regarding Kathleen Keane	\$350.00	0.2	\$70.00						
3/18/2024	Karen Ellis	Telephone conference with Ms. Keane regarding status	\$350.00	0.3	\$105.00						
3/19/2024	Megan Yarnall	Review draft settlement agreement, edits, and correspondence re same	\$650.00	0.5	\$325.00						
3/21/2024	Karen Ellis	Emails to and from Ms. Yarnall regarding set rates	\$350.00	0.2	\$70.00						
3/21/2024	Megan Yarnall	Emails with Ms. Ellis re fee petition	\$650.00	0.2	\$130.00						
3/22/2024	Megan Yarnall	Emails with cocounsel re settlement status	\$650.00	0.2	\$130.00						
3/28/2024	Karen Ellis	Review status at team meeting	\$350.00	0.2	\$70.00			0.2	\$ 70.00		
4/1/2024	Karen Ellis	Review emails	\$350.00	0.2	\$70.00						
4/1/2024	Megan Yarnall	Review and reply to emails from class members	\$650.00	0.2	\$130.00						
4/1/2024	Megan Yarnall	Review and reply to emails regarding final settlement agreement	\$650.00	0.2	\$130.00						
		Read, analyze and reply to Mr. Healey email regarding base fees and shortfall									
4/1/2024	Megan Yarnall	analysis and valuation of settlement	\$650.00	0.3	\$195.00						
4/2/2024	Karen Ellis	Email Ms. Yarnall	\$350.00	0.2	\$70.00						
4/2/2024	Karen Ellis	Review email from Mr. Healey regarding declarations from class members	\$350.00	0.2	\$70.00						
4/2/2024	Karen Ellis	Review email from Ms. Stebner	\$350.00	0.2	\$70.00						
4/2/2024	Karen Ellis	Telephone conference with Kathleen Griffin regarding status	\$350.00	0.4	\$140.00						
4/2/2024	Megan Yarnall	Review emails re class member declarations re settlement position	\$650.00	0.2	\$130.00						
		Emails from and to Mr. Healey regarding zoom meeting to discuss									
4/3/2024	Karen Ellis	declarations	\$350.00	0.2	\$70.00						
4/3/2024	Karen Ellis	Review class member notes	\$350.00	0.2	\$70.00						
4/3/2024	Karen Ellis	Review emails from class members	\$350.00	0.8	\$280.00						
4/3/2024	Megan Yarnall	Discuss same with Ms. Ellis	\$650.00	0.2	\$130.00						
		Review and reply correspondence re additional declarations from class									
4/3/2024	Megan Yarnall	members re settlement	\$650.00	0.2	\$130.00						
4/4/2024	Karen Ellis	Email Ms. Yarnall regarding client contact numbers	\$350.00	0.3	\$105.00						
4/4/2024	Karen Ellis	Email team regarding findings	\$350.00	0.2	\$70.00						
		Prepare for and attend Zoom meeting with Mr. Healey, Mr. Umpierre, and									
4/4/2024	Karen Ellis	Ms. Yarnall	\$350.00	0.8	\$280.00						
4/4/2024	Karen Ellis	Review email from Mr. Umpierre regarding past client contact information	\$350.00	0.2	\$70.00						
4/4/2024	Karen Ellis	Review file regarding move-in fees	\$350.00	0.8	\$280.00						
4/4/2024	Karen Ellis	Review files regarding client contacts since 2020	\$350.00	1.1	\$385.00						

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
4/4/2024	Megan Yarnall	Discuss plan re updating class members with Ms. Ellis and send email re same	\$650.00	0.7	\$455.00								
4/4/2024	Megan Yarnall	Phone conference with Mr. Healey, Mr. Umpierre, Ms. Ellis	\$650.00	0.3	\$195.00								
4/5/2024	Karen Ellis	Email Ms. Yarnall regarding status	\$350.00	0.2	\$70.00								
4/5/2024	Karen Ellis	Preparation of contact status recap	\$350.00	1.1	\$385.00								
4/5/2024	Karen Ellis	Telephone conference with class members regarding settlement	\$350.00	3.9	\$1,365.00								
4/10/2024	Karen Ellis	Email Ms. Yarnall regarding status	\$350.00	0.2	\$70.00								
4/10/2024	Karen Ellis	Telephone conference with Mx. DR, Mx. MG, Mx. DF	\$350.00	0.5	\$175.00								
4/10/2024	Megan Yarnall	Discuss declarations re settlement with Ms. Ellis	\$650.00	0.2	\$130.00								
4/11/2024	Megan Yarnall	Discuss settlement declarations with Ms. Ellis	\$650.00	0.2	\$130.00								
4/11/2024	Megan Yarnall	Email Mr. Umpierre regarding contacts with class members and declarations	\$650.00	0.2	\$130.00								
4/11/2024	Megan Yarnall	Discuss class member declarations with Ms. Ellis	\$650.00	0.2	\$130.00								
4/11/2024	Megan Yarnall	Review records re contacts with class members	\$650.00	0.2	\$130.00								
4/15/2024	Karen Ellis	Attempt to contact Mx. ED	\$350.00	0.2	\$70.00								
4/15/2024	Karen Ellis	Review draft declaration template	\$350.00	0.5	\$175.00								
4/15/2024	Karen Ellis	Review emails regarding status of settlement	\$350.00	0.2	\$70.00								
4/15/2024	Karen Ellis	Update class member outreach recap	\$350.00	0.4	\$140.00								
4/15/2024	Megan Yarnall	Discuss preliminary approval filing with Ms. Ellis	\$650.00	0.2	\$130.00								
4/15/2024	Megan Yarnall	Review emails regarding preliminary approval filing	\$650.00	0.2	\$130.00								
4/16/2024	Karen Ellis	Conference with Ms. Yarnall regarding status of settlement and declarations	\$350.00	0.5	\$175.00								
4/16/2024	Karen Ellis	Redline Mr. Umpierre's declaration and forward to Ms. Yarnall	\$350.00	0.8	\$280.00								
4/16/2024	Karen Ellis	Review Mr. Umpierre's draft declaration	\$350.00	0.2	\$70.00								
4/16/2024	Karen Ellis	Review notes from class member intakes and draft declaration of Debbie Boersman	\$350.00	1.8	\$630.00								
4/16/2024	Megan Yarnall	Discuss same with Ms. Ellis	\$650.00	0.5	\$325.00								
4/16/2024	Megan Yarnall	Review draft declarations re settlement	\$650.00	0.5	\$325.00								
4/17/2024	Karen Ellis	Edit draft declaration and forward to Ms. Yarnall	\$350.00	0.9	\$315.00								
4/17/2024	Karen Ellis	Review intake notes	\$350.00	0.3	\$105.00								
4/17/2024	Karen Ellis	Telephone conference with Michaele Brookstore regarding status	\$350.00	0.6	\$210.00								
4/18/2024	Karen Ellis	Review class member notes for declaration potential	\$350.00	0.9	\$315.00								
4/18/2024	Karen Ellis	Review status at team meeting; review class member notes	\$350.00	0.2	\$70.00				0.2	\$	70.00		
4/18/2024	Megan Yarnall	Discuss status with Ms. Ellis and Ms. Richardson	\$650.00	0.2	\$130.00				0.2	\$	130.00		
4/19/2024	Karen Ellis	Conference with Ms. Yarnall regarding status of declarations	\$350.00	0.2	\$70.00								
4/19/2024	Karen Ellis	Review emails re status of declarations	\$350.00	0.2	\$70.00								
4/19/2024	Megan Yarnall	Draft message to potential declarants	\$650.00	0.3	\$195.00								
4/19/2024	Megan Yarnall	Review draft class member declaration and email co-counsel re same	\$650.00	0.3	\$195.00								
4/19/2024	Megan Yarnall	Review stipulated settlement agreement	\$650.00	0.4	\$260.00								
4/22/2024	Karen Ellis	Conference with Ms. Yarnall regarding declarations	\$350.00	0.3	\$105.00								
4/22/2024	Karen Ellis	Download and review motion for preliminary approval of settlement	\$350.00	0.4	\$140.00				0.4	\$	140.00		
4/22/2024	Karen Ellis	Review emails from Mr. Healey regarding class member declarations	\$350.00	0.2	\$70.00								
4/22/2024	Karen Ellis	Telephone conference with Mx. DT	\$350.00	0.6	\$210.00								
4/22/2024	Megan Yarnall	Review draft declarations	\$650.00	0.2	\$130.00								
4/22/2024	Megan Yarnall	Discuss draft declarations with Ms. Ellis	\$650.00	0.2	\$130.00								
4/22/2024	Megan Yarnall	Emails re class member declarations re settlement	\$650.00	0.2	\$130.00								
4/23/2024	Karen Ellis	Emails to and from Ms. Yarnall regarding providing documents to class members	\$350.00	0.3	\$105.00								
4/23/2024	Karen Ellis	Review letter prepared by Ms. Yarnall to be provided to class members with settlement documents	\$350.00	0.4	\$140.00								
4/23/2024	Karen Ellis	Review Stipulation of Settlement, Injunction, and proposed notice to class members	\$350.00	2.1	\$735.00								
4/23/2024	Karen Ellis	Revise and save letter to potential declarants	\$350.00	0.4	\$140.00								

Fees

Date	Time Keeper	Task Description	Hourly	Hours	Fee (Rate x Hours)	Lodestar Reductions		CC Confs	Falkenberg	Travel	
			Rate	worked		General	Fees				
						Hrs	Fees	Hrs	Fees	Hrs	Fees
4/23/2024	Megan Yarnall	Draft email to potential declarants re settlement and email Ms. Ellis re same	\$650.00	0.4	\$260.00						
4/24/2024	Karen Ellis	Emails and texts from class members	\$350.00	3	\$1,050.00						
4/24/2024	Karen Ellis	Prepare and send emails to class members with Ms. Yarnall's email and settlement documents	\$350.00	1	\$350.00						
4/24/2024	Karen Ellis	Proof and edit email from Ms. Yarnall to class members	\$350.00	0.4	\$140.00						
4/24/2024	Karen Ellis	Telephone conference with Ms. Logan	\$350.00	0.3	\$105.00						
4/24/2024	Karen Ellis	Text class members who asked to be notified ahead of emailing documents	\$350.00	0.5	\$175.00						
4/25/2024	Karen Ellis	Emails from and to Mx. PM	\$350.00	0.4	\$140.00						
4/25/2024	Karen Ellis	Research re facility location for Mx. PM	\$350.00	0.4	\$140.00						
4/25/2024	Karen Ellis	Telephone conferences with class members regarding status, timing, settlement documents, and declarations	\$350.00	4.2	\$1,470.00						
4/25/2024	Karen Ellis	Update class member contact status list	\$350.00	0.4	\$140.00						
4/26/2024	Karen Ellis	Draft declarations	\$350.00	3.1	\$1,085.00						
4/26/2024	Karen Ellis	Emails to and from class members	\$350.00	1	\$350.00						
4/26/2024	Karen Ellis	Telephone conferences with class members	\$350.00	1.3	\$455.00						
4/29/2024	Karen Ellis	Draft declarations	\$350.00	4.6	\$1,610.00						
4/29/2024	Karen Ellis	Email class members regarding status	\$350.00	0.9	\$315.00						
4/30/2024	Karen Ellis	Conference with Ms. Yarnall regarding question about 1099	\$350.00	0.3	\$105.00						
4/30/2024	Karen Ellis	Email Ms. Yarnall regarding draft declarations	\$350.00	0.2	\$70.00						
4/30/2024	Karen Ellis	Proof and edit declarations	\$350.00	3.6	\$1,260.00						
4/30/2024	Karen Ellis	Review voicemail from Penny Helenihi	\$350.00	0.2	\$70.00						
4/30/2024	Karen Ellis	Texts to and from Ms. Halenih	\$350.00	0.2	\$70.00						
5/1/2024	Karen Ellis	Discuss declaration status with Ms. Yarnall	\$350.00	0.2	\$70.00						
5/1/2024	Karen Ellis	Emails from and to Mx. JA regarding status	\$350.00	0.6	\$210.00						
5/1/2024	Karen Ellis	Review email regarding loadstar	\$350.00	0.2	\$70.00						
5/1/2024	Karen Ellis	Review email from Mr. Healey regarding settlement update and declarations	\$350.00	0.4	\$140.00						
5/1/2024	Megan Yarnall	Work on fee and cost report	\$650.00	0.8	\$520.00						
5/1/2024	Megan Yarnall	Email Mr. Healey re fee and cost report	\$650.00	0.2	\$130.00						
5/1/2024	Megan Yarnall	Discuss declaration status with Ms. Ellis	\$650.00	0.2	\$130.00						
5/1/2024	Megan Yarnall	Email Mr. Healey re class member declaration status	\$650.00	0.2	\$130.00						
5/2/2024	Karen Ellis	Review emails re declarations	\$350.00	0.2	\$70.00						
5/2/2024	Karen Ellis	Review revised declarations	\$350.00	0.7	\$245.00						
5/2/2024	Karen Ellis	Emails from and to Ms. Yarnall regarding draft declarations	\$350.00	0.2	\$70.00						
5/2/2024	Megan Yarnall	Review and revise class member declarations re proposed settlement	\$650.00	3.2	\$2,080.00						
5/3/2024	Karen Ellis	Organize and review declarations to send to class members	\$350.00	1.7	\$595.00						
5/6/2024	Karen Ellis	Review and edit draft declarations	\$350.00	1.4	\$490.00						
5/6/2024	Karen Ellis	emails to and from class members regarding declarations	\$350.00	0.7	\$245.00						
5/6/2024	Karen Ellis	Telephone conferences with class members	\$350.00	3.1	\$1,085.00						
5/7/2024	Karen Ellis	Save finalized declarations and update status recap	\$350.00	0.4	\$140.00						
5/7/2024	Karen Ellis	Revise and resend declarations to class members	\$350.00	1.1	\$385.00						
5/7/2024	Karen Ellis	Emails and phone conferences with class members	\$350.00	1.5	\$525.00						
5/7/2024	Karen Ellis	Text class members regarding status of declarations	\$350.00	0.4	\$140.00						
5/8/2024	Karen Ellis	Review email from Ms. Felkner and forward to Ms. Yarnall	\$350.00	0.2	\$70.00						
5/8/2024	Karen Ellis	Save final declarations; update status recap	\$350.00	0.3	\$105.00						
5/8/2024	Karen Ellis	Edit and re-send declarations	\$350.00	0.5	\$175.00						
5/8/2024	Karen Ellis	Telephone conferences with and emails from and to class members regarding declarations	\$350.00	2.1	\$735.00						
5/9/2024	Karen Ellis	Save finalized declarations and edit status recap	\$350.00	0.2	\$70.00						
5/9/2024	Karen Ellis	Edit and re-send declarations	\$350.00	0.6	\$210.00						
5/9/2024	Karen Ellis	Emails from and to and telephone conferences with class members regarding declarations	\$350.00	1.4	\$490.00						

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
5/10/2024	Karen Ellis	Review emails regarding status of preliminary approval motion	\$350.00	0.2	\$70.00								
5/10/2024	Karen Ellis	Download and save final declarations and update status recap	\$350.00	0.3	\$105.00								
5/10/2024	Karen Ellis	Emails from and to class members regarding declarations;	\$350.00	1.9	\$665.00								
5/10/2024	Megan Yarnall	Discuss status of declarations with Ms. Ellis	\$650.00	0.2	\$130.00								
5/10/2024	Megan Yarnall	Email Mr. Healey re status of declarations	\$650.00	0.2	\$130.00								
		Emails to and from Ms. Yarnall regarding submitting declarations to Mr.											
5/13/2024	Karen Ellis	Umpierre	\$350.00	0.3	\$105.00								
5/13/2024	Karen Ellis	Revise and re-send declarations and update status recap	\$350.00	0.2	\$70.00								
5/13/2024	Karen Ellis	Phone conferences with class members	\$350.00	1.3	\$455.00								
5/14/2024	Karen Ellis	Review and update status update recap	\$350.00	0.3	\$105.00								
5/14/2024	Karen Ellis	Forward final declarations to Mr. Umpierre and Ms. Valdez via ShareFile	\$350.00	0.2	\$70.00								
5/14/2024	Karen Ellis	Proof and review final declarations	\$350.00	2.7	\$945.00								
		Review, download and save additional final declaration and forward same to											
5/15/2024	Karen Ellis	Mr. Umpierre and Ms. Valdez	\$350.00	0.6	\$210.00								
5/15/2024	Megan Yarnall	Review additional declaration and correspondence re same	\$650.00	0.2	\$130.00								
5/17/2024	Karen Ellis	Emails from and to Mx. JK regarding status	\$350.00	0.3	\$105.00								
5/17/2024	Karen Ellis	Emails from and to Mx. CM regarding settlement	\$350.00	0.3	\$105.00								
		Telephone conference with Mx. DF regarding settlement amount to class											
5/22/2024	Karen Ellis	members	\$350.00	0.2	\$70.00								
5/22/2024	Karen Ellis	Telephone conference with Mx. PH regarding 1099	\$350.00	0.2	\$70.00								
5/22/2024	Karen Ellis	Review settlement document regarding 1099 question	\$350.00	0.2	\$70.00								
		Conference with Ms. Yarnall regarding calls from class members with											
5/22/2024	Karen Ellis	question regarding 1099	\$350.00	0.2	\$70.00								
5/23/2024	Karen Ellis	Telephone conference with Penny Helenihi regarding 1099	\$350.00	0.3	\$105.00								
		Review memorandum from Mr. Healey regarding preliminary approval											
5/31/2024	Karen Ellis	motion status	\$350.00	0.3	\$105.00								
6/11/2024	Karen Ellis	Telephone conference with Mx. JK regarding status	\$350.00	0.3	\$105.00								
7/1/2024	Karen Ellis	Emails from and to Susan Heisler regarding status of settlement	\$350.00	0.2	\$70.00								
7/2/2024	Karen Ellis	Emails from and to Mx. CW regarding status of settlement	\$350.00	0.2	\$70.00								
7/9/2024	Karen Ellis	Telephone conference with Mx. KK regarding status of settlement	\$350.00	0.2	\$70.00								
7/12/2024	Karen Ellis	Telephone conference with Mx. MB regarding status of settlement	\$350.00	0.2	\$70.00								
7/15/2024	Karen Ellis	Emails from and to Mx. DB regarding status of settlement	\$350.00	0.2	\$70.00								
7/19/2024	Karen Ellis	Telephone conference with Mx. PH regarding status of settlement	\$350.00	0.2	\$70.00								
7/22/2024	Megan Yarnall	Review emails re inquiry re status of settlement approval	\$650.00	0.2	\$130.00								
7/23/2024	Karen Ellis	Telephone conference with Mx. KG regarding status of settlement	\$350.00	0.3	\$105.00								
7/26/2024	Karen Ellis	Emails from and to Mx. JA regarding status of settlement	\$350.00	0.2	\$70.00								
7/29/2024	Karen Ellis	Review court conditional order regarding settlement	\$350.00	0.5	\$175.00								
7/29/2024	Megan Yarnall	Review court's order and emails re status of settlement approval	\$650.00	0.3	\$195.00								
8/14/2024	Karen Ellis	Emails from and to Mx. DR regarding status	\$350.00	0.2	\$70.00								
8/19/2024	Karen Ellis	Emails from and to Mx. DBO regarding email change	\$350.00	0.2	\$70.00								
8/21/2024	Karen Ellis	Note file and notes regarding new email for Mx. DBO	\$350.00	0.2	\$70.00								
8/29/2024	Karen Ellis	Review status at team meeting	\$350.00	0.2	\$70.00				0.2	\$	70.00		
8/30/2024	Karen Ellis	Texts from and to class member Mx. DB regarding status and settlement	\$350.00	0.2	\$70.00								
		Emails from and to class members and telephone conference with class											
9/4/2024	Karen Ellis	members regarding settlement	\$350.00	0.5	\$175.00								
9/5/2024	Karen Ellis	Review email and court documents from Mr. Healey	\$350.00	0.4	\$140.00								
9/5/2024	Karen Ellis	Respond to class member calls and emails	\$350.00	1.4	\$490.00								
		Emails from and to Ms. Yarnall regarding responding to inquiries from class											
9/10/2024	Karen Ellis	members	\$350.00	0.2	\$70.00								
9/11/2024	Karen Ellis	Review proposed language for additional declarations	\$350.00	0.5	\$175.00								
		Review residency times on class member spreadsheet for class members who											
9/11/2024	Karen Ellis	provided declarations	\$350.00	0.6	\$210.00								
9/11/2024	Karen Ellis	Review prior declarations	\$350.00	0.6	\$210.00								
9/11/2024	Karen Ellis	Respond to emails from class members	\$350.00	0.4	\$140.00								

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees				
						General Hrs	Fees										
9/11/2024	Karen Ellis	Review and gather outreaches from class members regarding settlement	\$350.00	0.3	\$105.00												
9/11/2024	Karen Ellis	Review pleadings forwarded by Mr. Healey	\$350.00	0.3	\$105.00												
9/13/2024	Karen Ellis	Review status of declarations at team meeting	\$350.00	0.2	\$70.00				0.2	\$	70.00						
9/13/2024	Karen Ellis	Emails to and from prior declarants	\$350.00	0.4	\$140.00												
9/13/2024	Karen Ellis	Telephone conferences with prior declarants regarding supplemental declarations	\$350.00	2.8	\$980.00												
9/14/2024	Karen Ellis	Emails from and to Mx. DBO	\$350.00	0.2	\$70.00												
9/14/2024	Karen Ellis	Draft supplemental declaration and forward to Ms. Yarnall for review	\$350.00	0.3	\$105.00												
9/16/2024	Karen Ellis	Emails from and to class members	\$350.00	0.2	\$70.00												
9/16/2024	Karen Ellis	Emails from and to Ms. Yarnall regarding responding to class member	\$350.00	0.2	\$70.00												
9/16/2024	Karen Ellis	Emails to and from Mr. Healey regarding draft declaration	\$350.00	0.2	\$70.00												
9/16/2024	Karen Ellis	Conference with Ms. Yarnall re status of declarations	\$350.00	0.2	\$70.00												
9/17/2024	Karen Ellis	Prepare draft supplemental declarations for class members	\$350.00	1.2	\$420.00												
9/17/2024	Karen Ellis	Text Mx. BSO regarding declaration	\$350.00	0.2	\$70.00												
9/17/2024	Karen Ellis	Emails to and from class members forwarding draft supplemental declarations	\$350.00	0.8	\$280.00												
9/18/2024	Karen Ellis	Emails from and to class members regarding supplemental declarations	\$350.00	0.6	\$210.00												
9/18/2024	Karen Ellis	Save executed supplemental declarations to file	\$350.00	0.6	\$210.00	0.6	\$	210.00									
9/19/2024	Karen Ellis	Emails from and to class members regarding supplemental declarations	\$350.00	0.6	\$210.00												
9/19/2024	Karen Ellis	Text messages to and from class members regarding status of supplemental declarations	\$350.00	0.4	\$140.00												
9/19/2024	Karen Ellis	Combine and save supplemental declarations to file	\$350.00	0.5	\$175.00												
9/19/2024	Karen Ellis	Review supplemental declarations	\$350.00	0.4	\$140.00												
9/19/2024	Karen Ellis	Emails to and from Mx. DO to schedule telephone conference regarding questions about settlement	\$350.00	0.2	\$70.00												
9/20/2024	Karen Ellis	Final review of supplemental declarations	\$350.00	0.4	\$140.00												
9/20/2024	Karen Ellis	Email Mr. Healey forwarding supplemental declarations	\$350.00	0.2	\$70.00												
9/20/2024	Karen Ellis	Telephone conference with Mx. DO regarding settlement questions; emails to Mx. DO forwarding second amended complaint and settlement administrator contact information	\$350.00	0.7	\$245.00												
9/20/2024	Karen Ellis		\$350.00	0.3	\$105.00												
Total Lodestar					2622.0	\$1,140,528.40											
Lodestar Reductions					\$	(279.51)	Perct	202.2	\$	95,172.70	21.7	\$12,862	51.8	\$19,443	38	\$24,700	
							Subt	1		1	0.3	0.3	1	1	0.5	0.5	
								202.2	95172.7	6.51	\$3,858	51.8	\$	19,442.50	19	\$	12,350.00
Net Lodestar						\$1,140,248.89	Summary	Hours	Dollars								
							General	202.2	\$	95,172.70							
							CC Confs	6.51	\$	3,858.45							
							Falkenberg	51.8	\$	19,442.50							
							Travel	19	\$	12,350.00							
							Total Reductions	279.51	\$	130,823.65							

Costs

Category	Amount
Advertising for class member outreach	\$ 14,609.77
Experts/Consultants	\$ 41,645.62
Depositions	\$ 5,985.62
Airfare and Related	\$ 1,380.50
Lodging and Related	\$ 1,208.13
Third Party Copy	\$ 1,014.03
Postage	\$ 370.02

Fees

Date	Time Keeper	Task Description	Hourly Rate	Hours worked	Fee (Rate x Hours)	<u>Lodestar Reductions</u>		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
TOTAL	\$	66,213.69											

MARKS BALETTE

Marks Balette - Lodestar Fees/Costs

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
3/13/2019	David Marks	Teleconference with Attorney Healey regarding discovery/data issues .20	\$950.00	0.2	\$190.00								
3/14/2019	David Marks	Receive and review Attorney Fee Agreement with co-counsel .30	\$950.00	0.3	\$285.00								
3/20/2019	David Marks	Teleconference with Attorney C. Healey regarding staffing model issues .20	\$950.00	0.2	\$190.00								
6/17/2019	David Marks	Review case law - Shiferaw v. Sunrise .30	\$950.00	0.3	\$285.00								
9/12/2019	David Marks	Teleconference with Attorney C. Healey regarding analysis/status and prepare for conference call .30	\$950.00	0.3	\$285.00								
11/18/2019	David Marks	Teleconference with Attorney C. Healey regarding cost issues .20	\$950.00	0.2	\$190.00								
11/22/2019	Jim Thornton	Received and reviewed Motion to Compel related to edits .3	\$500.00	0.3	\$150.00								
11/25/2019	David Marks	Go to Meeting and teleconference with Attorney Thornton re: MTC .10	\$950.00	1.1	\$1,045.00								
11/25/2019	David Marks	Emails to Attorney Thornton re: Sunrise MTC document and trade secret objections .30	\$950.00	0.3	\$285.00								
11/25/2019	Jim Thornton	GoToMeeting and calls with David Marks regarding Motion to Compel .11	\$500.00	1.1	\$550.00								
11/25/2019	Jim Thornton	Emails to David Marks regarding Sunrise Motion to Compel document and trade secret objections .5	\$500.00	0.5	\$250.00								
11/25/2019	Jim Thornton	Work on Motion to Compel .4	\$500.00	0.4	\$200.00								
11/25/2019	Jim Thornton	Sent email to David Marks regarding section of Motion to Compel requiring most attention .3	\$500.00	0.3	\$150.00								
11/26/2019	David Marks	Go to Meeting and teleconference with Attorney Thornton re: Sunrise MTC and numerous revisions to same .3.80	\$950.00	3.8	\$3,610.00								
11/26/2019	Jim Thornton	GoToMeeting and calls with David Marks regarding Sunrise Motion to Compel and numerous revisions to same .3.8	\$500.00	3.8	\$1,900.00								
11/26/2019	Jim Thornton	Prepared email of transmittal to co-counsel .3	\$500.00	0.3	\$150.00								
11/26/2019	Jim Thornton	Received and reviewed second amended complaint from Jason Young .3	\$500.00	0.3	\$150.00								
11/27/2019	Jim Thornton	Pulled quotes from Complaint .2	\$500.00	0.2	\$100.00								
11/30/2019	Jim Thornton	Review of Second Amended Complaint and highlighted key language .3	\$500.00	0.3	\$150.00								
12/2/2019	David Marks	Work on my draft declaration ISO Joint Stipulation of Points and Authorities on Plaintiff's MTC .2.00	\$950.00	2	\$1,900.00								
12/2/2019	Diane Asher	Assist in drafting declaration ISO Joint Stipulation of Points and Authorities	\$85.00	2	\$170.00								
12/3/2019	David Marks	Finalize and execute my declaration ISO Joint Stipulation of Points and Authorities on Plaintiff's MTC .10	\$950.00	0.1	\$95.00								
12/3/2019	David Marks	Compose email to CA Team transmitting same .10	\$950.00	0.1	\$95.00								
12/23/2019	David Marks	Teleconference with Attorney C. Healey regarding Defendant's arguments .10	\$950.00	0.1	\$95.00								
1/2/2020	David Marks	Receipt and review email from Attorney Healey regarding policy entitled "Assessing & Evaluating Residents" .20	\$950.00	0.2	\$190.00								
1/2/2020	David Marks	Compose response email to Attorneys Healey, Thamer and Stebner regarding same .20	\$950.00	0.2	\$190.00								
1/2/2020	David Marks	Compose email to Dale Schroyer regarding conflicts check concerning Sunrise .10	\$950.00	0.1	\$95.00								
1/2/2020	Jim Thornton	Received and reviewed email related to assessments and automated care system .3	\$500.00	0.3	\$150.00								

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
					<u>Worked</u>		<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>		
	1/2/2020	Jim Thornton	Received and reviewed email regarding ESI searches .2	\$500.00	0.2		\$100.00									
	1/5/2020	Jim Thornton	Received and reviewed proposed standard discovery operating procedure from David Marks to California team .2	\$500.00	0.2		\$100.00									
	1/6/2020	David Marks	Receipt and review email from Attorney Thamer regarding ED Sunrise depo questions 1.00	\$950.00	1		\$950.00									
	1/6/2020	Jim Thornton	Received and reviewed target staffing documents .3	\$500.00	0.3		\$150.00									
	1/6/2020	Jim Thornton	Received and reviewed email regarding validation referenced in Sunrise website .2	\$500.00	0.2		\$100.00									
	1/6/2020	Jim Thornton	Review Sunrise website and responded to David Marks .3	\$500.00	0.3		\$150.00									
	1/8/2020	David Marks	Review material and prep for mediation, including review of 1) spreadsheet from Attorney Thornton and B. Peters comparing staffing CA chains to Sunrise, 2) S. Meachen mediation slides 1.40	\$950.00	1.4		\$1,330.00									
	1/8/2020	Sterling Meachen	Conferred with Attorney Marks on slides to be used at mediation	\$225.00	1.4		\$315.00									
	1/9/2020	David Marks	Compose email to CA Team regarding ED depo and Sunrise target staffing document (sent this afternoon) .60	\$950.00	0.6		\$570.00									
	1/9/2020	Jim Thornton	Received and reviewed staffing data and additional staffing related documents .3	\$500.00	0.3		\$150.00									
	1/10/2020	David Marks	Emails to Attorney Thornton re: allocation of MedModel ALF work .20	\$950.00	0.2		\$190.00									
	1/10/2020	Jim Thornton	Received and reviewed emails from David Marks and team regarding allocation of MedModel ALF work .2	\$500.00	0.2		\$100.00									
	1/11/2020	Jim Thornton	Received and reviewed email from Chris Healey regarding allocation of MedModel ALF work .1	\$500.00	0.1		\$50.00									
	1/13/2020	David Marks	Review summary of depositions .20	\$950.00	0.2		\$190.00									
	1/13/2020	David Marks	Compose email to Attorney Thornton regarding same .10	\$950.00	0.1		\$95.00									
	1/13/2020	Jim Thornton	Received and reviewed summary of depositions of EDs .2	\$500.00	0.2		\$100.00									
	1/14/2020	David Marks	Review, organize and file Sunrise emails 1.60	\$950.00	1.6		\$1,520.00									
	1/14/2020	Jim Thornton	Received and reviewed email regarding Sunrise staffing methodology .2	\$500.00	0.2		\$100.00									
	1/15/2020	David Marks	Teleconference with Attorney C. Healey regarding staffing analysis and related issues .20	\$950.00	0.2		\$190.00									
	1/16/2020	David Marks	Compose email to Attorney Stebner/Stebner Team regarding former ED questions .40	\$950.00	0.4		\$380.00									
	1/17/2020	David Marks	Review of Sunrise documents for input on discovery hearing 1.00	\$950.00	1		\$950.00									
	1/17/2020	Jim Thornton	Received and reviewed staffing methodology documents in advance of modeling .3	\$500.00	0.3		\$150.00									
	1/20/2020	Jacques Balette	Review Sealed Declaration of Ashley Allyn	\$750.00	0.6		\$450.00									
	1/20/2020	David Marks	Send key doc summary to Attorney Thornton .20	\$950.00	0.2		\$190.00									
	1/20/2020	David Marks	Teleconferences with Attorney Thornton regarding the same .80	\$950.00	0.8		\$760.00									
	1/20/2020	David Marks	Prep for Sunrise call by reviewing key documents provided by Attorney Healey 2.30	\$950.00	2.3		\$2,185.00									
	1/20/2020	David Marks	Teleconferences with CA team regarding Sunrise discovery hearing (Thursday) and issues related to missing assessment, census, and staffing data 1.20	\$950.00	1.2		\$1,140.00			1.2	1140					
	1/20/2020	David Marks	Teleconference w/ Attorney Healey regarding last time studies and related issues .30	\$950.00	0.3		\$285.00									

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/20/2020	Jim Thornton	Received and reviewed key doc summary in advance of call with California team from David Marks [.3]	\$500.00	0.3	\$150.00								
1/20/2020	Jim Thornton	Calls with David Marks related to key doc summary [.8]	\$500.00	0.8	\$400.00								
1/24/2020	David Marks	Receipt and review email from Attorney Healey regarding Motion to Compel Order [.40]	\$950.00	0.4	\$380.00								
1/24/2020	Jim Thornton	Received and reviewed update on Motion to Compel [.2]	\$500.00	0.2	\$100.00								
1/29/2020	David Marks	Receipt and review email from Attorney Healey regarding Sunrise task time question, protective order [.20]	\$950.00	0.2	\$190.00								
1/29/2020	David Marks	Compose email to CA Team and experts regarding response to same [.10]	\$950.00	0.1	\$95.00								
1/30/2020	David Marks	Teleconference with Attorney Healey regarding Sunrise discovery deadline, time study and protective order [.20]	\$950.00	0.2	\$190.00								
1/30/2020	David Marks	Review emails regarding same [.30]	\$950.00	0.3	\$285.00								
1/30/2020	David Marks	Teleconference with Attorney Healey regarding the charting of services [.10]	\$950.00	0.1	\$95.00								
1/30/2020	Jim Thornton	Emails regarding task time info and protective order, assuring protection of confidential info [.3]	\$500.00	0.3	\$150.00								
1/31/2020	Jim Thornton	Received and reviewed email regarding Blake Peters' protection of confidential data and comments from David Marks [.2]	\$500.00	0.2	\$100.00								
2/4/2020	Jacques Balette	Review Amended Notice of Deposition of Plaintiffs	\$750.00	0.2	\$150.00								
2/4/2020	David Marks	Receipt and review (a) correspondence from Sunrise regarding discovery, and (b) email trail regarding same [.30]	\$950.00	0.3	\$285.00								
2/4/2020	Jim Thornton	Received and reviewed emails regarding sampling and data [.2]	\$500.00	0.2	\$100.00								
2/5/2020	David Marks	Teleconference with Attorney Healey regarding MBGY expense reimbursement, and regarding discovery update [.20]	\$950.00	0.2	\$190.00								
2/12/2020	Jim Thornton	Received and reviewed email regarding potential defense experts [.2]	\$500.00	0.2	\$100.00								
2/20/2020	David Marks	Compose response email to Attorney Healey regarding case update [.40]	\$950.00	0.4	\$380.00								
2/20/2020	Jim Thornton	Received and reviewed email related to call with California team and reviewed agenda [.3]	\$500.00	0.3	\$150.00								
2/20/2020	Jim Thornton	Received notice that task time data was produced [.1]	\$500.00	0.1	\$50.00								
2/21/2020	David Marks	GoToMeeting with Attorney Thornton re: Motion for Class Action Cert., Sunrise Staffing Methodology, and sample Sunrise data/docs [.90]	\$950.00	0.9	\$855.00								
2/21/2020	David Marks	Teleconference with Attorney C. Healey regarding potential analysis [.80]	\$950.00	0.8	\$760.00								
2/21/2020	Jim Thornton	Work on deciphering Sunrise staffing point system [2.1]	\$500.00	2.1	\$1,050.00								
2/21/2020	Jim Thornton	General prep in advance of meeting with David Marks [.3]	\$500.00	0.3	\$150.00								
2/21/2020	Jim Thornton	GoToMeeting with David Marks related to motion for class cert, Sunrise staffing methodology, and sample Sunrise data/docs [.9]	\$500.00	0.9	\$450.00								
2/24/2020	David Marks	Teleconference with Attorney Healey regarding sum aggregate target hours vs. actual hours [.50]	\$950.00	0.5	\$475.00								
2/27/2020	David Marks	Receipt and review email from Sunrise counsel, Attorney Joseph Gorman, transmitting correspondence from Sunrise Attorney Michele Maryott regarding objections to Plaintiff's 1.7.20 30(b)(6) depo notice [.30]	\$950.00	0.3	\$285.00								
2/27/2020	David Marks	Receipt and review email from Attorney Healey regarding same [.20]	\$950.00	0.2	\$190.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
3/12/2020	David Marks	Review emails regarding projects, analysis priorities, and organize priorities by subject 2.30	\$950.00	2.3	\$2,185.00								
3/12/2020	David Marks	Teleconference with Attorney C. Healey regarding case status and expert analysis .30	\$950.00	0.3	\$285.00								
3/16/2020	Jacques Balette	Assist in drafting Sunrise RFP	\$750.00	2.2	\$1,650.00								
3/16/2020	David Marks	Draft Sunrise RFP .20	\$950.00	0.2	\$190.00								
3/16/2020	Diane Asher	Collaborate with Attorney DTM in drafting Sunrise RFP	\$85.00	0.2	\$17.00								
3/16/2020	Jim Thornton	Located and sent multiple emails to Blake Peters regarding staffing methodology and task time data .4	\$500.00	0.4	\$200.00								
3/16/2020	Jim Thornton	Brief review of task time data .6	\$500.00	0.6	\$300.00								
3/16/2020	Jim Thornton	Review of numerous SUN00xxxx documents for purposes of staffing analysis 3.6	\$500.00	3.6	\$1,800.00								
3/17/2020	David Marks	Compose email to Attorney Healey regarding depo in Sunrise .10	\$950.00	0.1	\$95.00								
3/26/2020	David Marks	Receipt of email from Attorney Thornton re: lack of data .10	\$950.00	0.1	\$95.00								
3/26/2020	David Marks	Emails to Attorney Thornton re: setting up call to discuss data needed for analysis .10	\$950.00	0.1	\$95.00								
3/26/2020	Jim Thornton	Received and reviewed Blake Peters' first impressions of data produced .3	\$500.00	0.3	\$150.00								
3/26/2020	Jim Thornton	Emailed Blake Peters and David Marks regarding lack of data .1	\$500.00	0.1	\$50.00								
3/26/2020	Jim Thornton	Received and reviewed emails with David Marks and Chris Healey setting up call to discuss data needed for analysis .2	\$500.00	0.2	\$100.00								
3/27/2020	David Marks	Review Sunrise documents and emails .50	\$950.00	0.5	\$475.00								
3/27/2020	David Marks	Teleconference call with Attorney Thornton regarding review/edit of Protective Order and issues with Dr. Cristina Flores regarding same 1.00	\$950.00	1	\$950.00								
3/27/2020	David Marks	Multiple teleconferences with Attorney Healey regarding receipt and review of staffing data, and regarding emails regarding confidentiality and needed data 0.50	\$950.00	0.5	\$475.00								
3/27/2020	Jim Thornton	Received and reviewed sunrise data and floorplans updates--work on attempting to open same 2.5	\$500.00	2.5	\$1,250.00								
3/27/2020	Jim Thornton	Numerous emails related to login information and Blake Peters having issues accessing data .8	\$500.00	0.8	\$400.00								
3/27/2020	Jim Thornton	Pulled language from confidentiality agreement and emailed David Marks regarding same .4	\$500.00	0.4	\$200.00								
3/27/2020	Jim Thornton	Review Sunrise confidentiality provisions and executed same .6	\$500.00	0.6	\$300.00								
3/27/2020	Jim Thornton	Sent executed confidentiality agreement to David Marks and Diane Asher .2	\$500.00	0.2	\$100.00								
3/27/2020	Jim Thornton	Researched and prepared listing of ALF software with staffing component 1.4	\$500.00	1.4	\$700.00								
3/27/2020	Jim Thornton	Sent listing of ALF software to David Marks .1	\$500.00	0.1	\$50.00								
3/27/2020	Jim Thornton	Calls with David Marks related ALF software and confidentiality language 1.0	\$500.00	1	\$500.00								
3/27/2020	Jim Thornton	Work on basic audit of data received .9	\$500.00	0.9	\$450.00								
3/27/2020	Jim Thornton	Email to Tracy Myrick and team related to basic audit of data received in Sunrise's discovery responses .5	\$500.00	0.5	\$250.00								
3/28/2020	Jim Thornton	Received and reviewed multiple emails regarding data and zip files in David Marks office .2	\$500.00	0.2	\$100.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
3/30/2020	David Marks	Teleconferences with Attorney Thornton regarding data and Dr. Cristina Flores .9	\$950.00	0.9	\$855.00								
3/30/2020	Jim Thornton	Received and reviewed emails regarding flash drive sent to David Marks' office .2	\$500.00	0.2	\$100.00								
3/30/2020	Jim Thornton	Work on draft email to Chris Healey regarding information received 1.0	\$500.00	1	\$500.00								
3/30/2020	Jim Thornton	Call with Dr. Cristina Flores regarding ALF software with staffing component .6	\$500.00	0.6	\$300.00								
3/30/2020	Jim Thornton	Email regarding call with Dr. Cristina Flores to David Marks .1	\$500.00	0.1	\$50.00								
3/30/2020	Jim Thornton	Received and reviewed engagement letter and agreement to be bound by confidentiality provisions .2	\$500.00	0.2	\$100.00								
3/30/2020	Jim Thornton	Executed and returned engagement letter and agreement to be bound by confidentiality provisions .2	\$500.00	0.2	\$100.00								
3/30/2020	Jim Thornton	Emails with Blake Peters regarding contract labor .3	\$500.00	0.3	\$150.00								
3/30/2020	Jim Thornton	Multiple calls with Blake Peters regarding access to files .4	\$500.00	0.4	\$200.00								
3/30/2020	Jim Thornton	Calls with David Marks regarding data and Dr. Cristina Flores .9	\$500.00	0.9	\$450.00								
3/31/2020	David Marks	GoToMeeting with Attorney Thornton regarding staffing/target job titles, review of assessment data produced, and issues with analysis of assessment 2.80	\$950.00	2.8	\$2,660.00								
3/31/2020	David Marks	Compose email to CA Team regarding problem in performing staffing analysis based on assessment data .70	\$950.00	0.7	\$665.00								
3/31/2020	David Marks	Teleconference with Attorney Healey regarding Move Out/Discharge Date .20	\$950.00	0.2	\$190.00								
3/31/2020	David Marks	Teleconference with Attorney Thornton and B. Peters regarding staff who are considered "caregivers" .60	\$950.00	0.6	\$570.00								
3/31/2020	David Marks	Compose email to CA Team regarding staffing analysis, definition of caregivers and needed data .50	\$950.00	0.5	\$475.00								
3/31/2020	David Marks	Teleconference with Attorney Thornton and B. Peters regarding Sunrise staffing (and breaks) .40	\$950.00	0.4	\$380.00								
3/31/2020	David Marks	GoToMeeting with Attorney Marks and B. Peters task time info and caregiver definitions .6	\$950.00	0.6	\$570.00								
3/31/2020	Jim Thornton	Received and reviewed Sunrise info from Tracy Myrick .3	\$500.00	0.3	\$150.00								
3/31/2020	Jim Thornton	Responded to Tracy Myrick regarding issues with data access due to encryption from Sunrise .2	\$500.00	0.2	\$100.00								
3/31/2020	Jim Thornton	Prepared and sent email to David Marks regarding issues with pdf assessments and data extraction .6	\$500.00	0.6	\$300.00								
3/31/2020	Jim Thornton	Review of actual and target staffing data .4	\$500.00	0.4	\$200.00								
3/31/2020	Jim Thornton	Email David Marks w/ staffing info and noted understaffing based on monthly reports .4	\$500.00	0.4	\$200.00								
3/31/2020	Jim Thornton	GoToMeeting with David Marks and Blake Peters regarding Sunrise data needed for analysis and email to Chris Healey 2.8	\$500.00	2.8	\$1,400.00								
3/31/2020	Jim Thornton	Emails with David Marks regarding close date of service plan .3	\$500.00	0.3	\$150.00								
3/31/2020	Jim Thornton	Review of service plan data looking for close date information .9	\$500.00	0.9	\$450.00								
3/31/2020	Jim Thornton	Email to David Marks with detailed review of service plan data .5	\$500.00	0.5	\$250.00								
3/31/2020	Jim Thornton	Prep for meeting regarding caregiver definitions .2	\$500.00	0.2	\$100.00								
3/31/2020	Jim Thornton	GoToMeeting with David Marks and Blake Peters task time info and caregiver definitions .6	\$500.00	0.6	\$300.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked		General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
3/31/2020	Jim Thornton	Prep listing of caregivers and sent to David Marks [.3]	\$500.00	0.3	\$150.00								
3/31/2020	Jim Thornton	Texts and calls with Blake Peters regarding matrix report and analyses [.8]	\$500.00	0.8	\$400.00								
3/31/2020	Jim Thornton	Calls with David Marks regarding to do list [.4]	\$500.00	0.4	\$200.00								
4/1/2020	David Marks	GoToMeetings with Attorney Thornton and B. Peters re: caregiver list and staffing analysis [1.5]	\$950.00	1.5	\$1,425.00								
4/1/2020	David Marks	Review of verification and validation article from Dr. David Belson [.70]	\$950.00	0.7	\$665.00								
4/1/2020	David Marks	Receipt and review email from Attorney Umpierre containing RealPage docs (Bates OMG00018381- 00020713) [1.00]	\$950.00	1	\$950.00								
4/1/2020	David Marks	Teleconference with Attorney Thornton re staffing project [.2]	\$950.00	0.2	\$190.00								
4/1/2020	Jim Thornton	GoToMeetings with Blake Peters and David Marks regarding caregiver list and staffing analysis [1.5]	\$500.00	1.5	\$750.00								
4/1/2020	Jim Thornton	Emails to team regarding caregivers to be included in analysis [.3]	\$500.00	0.3	\$150.00								
4/1/2020	Jim Thornton	Multiple calls with Blake Peters regarding caregiver included in analysis and issue of last day in December data being cut off [1.3]	\$500.00	1.3	\$650.00								
4/1/2020	Jim Thornton	Call with David Marks re staffing project [.2]	\$500.00	0.2	\$100.00								
4/2/2020	David Marks	Review Sunrise emails for staffing and operation manual identified by Attorneys Healey and Umpierre, and forwarded same to Attorney Thornton [.40]	\$950.00	0.4	\$380.00								
4/2/2020	David Marks	Teleconference with Attorney Thornton regarding Sunrise relevant documents, B. Peters staffing status, and status of task time analysis [.70]	\$950.00	0.7	\$665.00								
4/2/2020	David Marks	Teleconference with Attorney Thornton regarding census, task time questions, and status of B. Peters' Alta Loma staffing analysis [1.2]	\$950.00	1.2	\$1,140.00								
4/2/2020	David Marks	GoToMeeting with Attorney Thornton re: questions related task times [1.5]	\$950.00	1.5	\$1,425.00								
4/2/2020	David Marks	Compose email to CA Team regarding Sunrise daily census AL & REM [.10]	\$950.00	0.1	\$95.00								
4/2/2020	Jim Thornton	Work on detailed analysis of Sunrise Task Times [1.8]	\$500.00	1.8	\$900.00								
4/2/2020	Jim Thornton	Prepared list of questions regarding Sunrise Task Times [.6]	\$500.00	0.6	\$300.00								
4/2/2020	Jim Thornton	Sent questions to David Marks [.1]	\$500.00	0.1	\$50.00								
4/2/2020	Jim Thornton	Attempted to download Sunrise manuals [.3]	\$500.00	0.3	\$150.00								
4/2/2020	Jim Thornton	Emailed David Marks regarding Sunrise manuals [.1]	\$500.00	0.1	\$50.00								
4/2/2020	Jim Thornton	Work on analysis of target hours for Sunrise [2.7]	\$500.00	2.7	\$1,350.00								
4/2/2020	Jim Thornton	Sent to David Marks [.2]	\$500.00	0.2	\$100.00								
4/2/2020	Jim Thornton	Calls with David Marks regarding analyses performed [1.9]	\$500.00	1.9	\$950.00								
4/2/2020	Jim Thornton	Calls with Blake Peters regarding staffing at Sunrise and comparisons to other chains [.4]	\$500.00	0.4	\$200.00								
4/2/2020	Jim Thornton	Work on Sunrise census, GoToMeeting with David Marks on Sunrise working on questions related to task times [1.5]	\$500.00	1.5	\$750.00								
4/2/2020	Jim Thornton	Sent updated questions to David Marks [.1]	\$500.00	0.1	\$50.00								
4/2/2020	Jim Thornton	Email to Feldman regarding verification and validation issues [.2]	\$500.00	0.2	\$100.00								
4/2/2020	Jim Thornton	Call with David Marks regarding Sunrise relevant documents, Blake Peters staffing status, and status of task time analysis [.7]	\$500.00	0.7	\$350.00								
4/2/2020	Jim Thornton	Call with David Marks regarding census, task time questions, and status of Alta Loma staffing analysis [1.2]	\$500.00	1.2	\$600.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
4/3/2020	David Marks	Teleconference and GoToMeeting with Attorney Thornton regarding (a) 30b(6) depo prep - Sunrise task time questions for depo, (b) Dr. Richard Feldman, and (c) review of analysis 3.30	\$950.00	3.3		\$3,135.00								
4/3/2020	David Marks	Teleconference with Attorney Healey regarding uniform assessment and target formula .90	\$950.00	0.9		\$855.00								
4/3/2020	Jim Thornton	Received and reviewed email from Brian Umpierre regarding AL and REM census .2	\$500.00	0.2		\$100.00								
4/3/2020	Jim Thornton	Continue work on task time questions .8	\$500.00	0.8		\$400.00								
4/3/2020	Jim Thornton	GoToMeeting an calls with David Marks regarding Sunrise task time questions and exhibits/examples of issues 3.3	\$500.00	3.3		\$1,650.00								
4/3/2020	Jim Thornton	Call with and requested Blake Peters to perform staffing analysis in Sunrise .2	\$500.00	0.2		\$100.00								
4/3/2020	Jim Thornton	Emails to Blake Peters regarding staffing analysis .2	\$500.00	0.2		\$100.00								
4/3/2020	Jim Thornton	Call with Blake Peters regarding staffing data questions .3	\$500.00	0.3		\$150.00								
4/3/2020	Jim Thornton	Review of Sunrise Ex Director manual and highlighted same .5	\$500.00	0.5		\$250.00								
4/3/2020	Jim Thornton	Sent to David Marks .1	\$500.00	0.1		\$50.00								
4/3/2020	Jim Thornton	Continue work on the task time questions and prepared exhibits with related examples from the data 2.1	\$500.00	2.1		\$1,050.00								
4/3/2020	Jim Thornton	Received and reviewed notice that deposition cancelled .1	\$500.00	0.1		\$50.00								
4/3/2020	Jim Thornton	Received and reviewed email with key docs and password .2	\$500.00	0.2		\$100.00								
4/4/2020	David Marks	Teleconference with Attorney Thornton re: Documents .30	\$950.00	0.3		\$285.00								
4/4/2020	Jim Thornton	Call from David Marks regarding Sunrise documents .3	\$500.00	0.3		\$150.00								
4/5/2020	Jim Thornton	Sent Blake Peters census info .2	\$500.00	0.2		\$100.00								
4/5/2020	Jim Thornton	Sent requested Sunrise docs to David Marks .2	\$500.00	0.2		\$100.00								
4/5/2020	Jim Thornton	Calls and texts with Blake Peters regarding census info .3	\$500.00	0.4		\$200.00								
4/5/2020	Jim Thornton	Received and reviewed analysis from Blake Peters comparing PPDs of various chains .3	\$500.00	0.3		\$150.00								
4/6/2020	David Marks	Review Sunrise staffing terminology and job titles in punch detail for determination of caregiver/non-caregiver status .6	\$950.00	0.6		\$570.00								
4/6/2020	David Marks	Compose email to CA Team regarding impact of same on caregiver analysis .2	\$950.00	0.2		\$190.00								
4/6/2020	David Marks	GoToMeeting with Attorney Thornton and B. Peters re: Staffing .40	\$950.00	0.4		\$380.00								
4/6/2020	Jim Thornton	Emails to and from Blake Peters regarding staff in training and impact on overall staffing .5	\$500.00	0.5		\$250.00								
4/6/2020	Jim Thornton	Email census information to David Marks .2	\$500.00	0.2		\$100.00								
4/6/2020	Jim Thornton	Brief GoToMeeting regarding Sunrise staffing with David Marks and Blake Peters .4	\$500.00	0.4		\$200.00								
4/6/2020	Jim Thornton	Received and reviewed analysis from Blake Peters of actual staffing from labor detail report versus punch detail staffing and related emails .5	\$500.00	0.5		\$250.00								
4/7/2020	David Marks	Meeting with B. Peters regarding 10-minute breaks - quarterly vs. punch detail .40	\$950.00	0.4		\$380.00								
4/7/2020	David Marks	Teleconference with Attorney Healey regarding staffing 0.70	\$950.00	0.7		\$665.00								
4/7/2020	Jim Thornton	Received and reviewed updated analyses from Blake Peters of staffing information .4	\$500.00	0.4		\$200.00								
4/8/2020	David Marks	Review B. Peters analysis regarding staffing .30	\$950.00	0.3		\$285.00								
4/8/2020	David Marks	Compose email to CA Team forwarding same .10	\$950.00	0.1		\$95.00								
4/8/2020	Jim Thornton	Received and reviewed emails from David Marks regarding ranking of facilities based on PPD .2	\$500.00	0.2		\$100.00								

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						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
4/8/2020	Jim Thornton	Received and reviewed email regarding sample data and unusable format .2	\$500.00	0.2	\$100.00								
4/8/2020	Jim Thornton	Received and reviewed Blake Peter's analysis and ranking of facilities based on PPD .6	\$500.00	0.6	\$300.00								
4/8/2020	Jim Thornton	Received and reviewed email from Chris Healey regarding extrapolation concept .3	\$500.00	0.3	\$150.00								
4/9/2020	David Marks	Teleconference with Attorney Healey regarding certification date and declaration needs 0.60	\$950.00	0.6	\$570.00								
4/10/2020	David Marks	Teleconference with Cristina Flores regarding NC study .40	\$950.00	0.4	\$380.00								
4/10/2020	David Marks	Meeting with B. Peters regarding Sunrise comparison to NC, Sunrise Sept. vs. Oct., and Sunrise trend by month .70	\$950.00	0.7	\$665.00								
4/10/2020	Jim Thornton	Received and reviewed Blake Peters analysis of actual/target staffing data .3	\$500.00	0.3	\$150.00								
4/10/2020	Jim Thornton	Received and reviewed emails regarding NC standards .4	\$500.00	0.4	\$200.00								
4/10/2020	Jim Thornton	Received and reviewed correspondence from defense regarding searchable .pdf format .3	\$500.00	0.3	\$150.00								
4/10/2020	Jim Thornton	Emails regarding searchable .pdf .2	\$500.00	0.2	\$100.00								
4/13/2020	David Marks	GoToMeeting with Attorney Thornton regarding review of Sunrise searchable PDF documents 2.3	\$950.00	2.3	\$2,185.00								
4/13/2020	David Marks	Compose email to CA Team regarding Sunrise searchable PDF documents .2	\$950.00	0.2	\$190.00								
4/13/2020	David Marks	Teleconference with Attorney Thornton re: NC regs. and task time study .70	\$950.00	0.7	\$665.00								
4/13/2020	Jim Thornton	Review and respond to Sunrise's position that database data can only be exported to .pdf 1.3	\$500.00	1.3	\$650.00								
4/13/2020	Jim Thornton	Research of PointClickCare and Sunrise ConnectCare and sent David Marks results .5	\$500.00	0.5	\$250.00								
4/13/2020	Jim Thornton	Call with Mike Perry regarding database oriented Care Connect system .3	\$500.00	0.3	\$150.00								
4/13/2020	Jim Thornton	Work on email regarding CareConnect and database connectivity 1.2	\$500.00	1.2	\$600.00								
4/13/2020	Jim Thornton	GoToMeeting with David Marks regarding Sunrise assessment data and North Carolina study 2.3	\$500.00	2.3	\$1,150.00								
4/13/2020	Jim Thornton	Received and reviewed NC case and exhibits related to task time .4	\$500.00	0.4	\$200.00								
4/13/2020	Jim Thornton	Pull and sent NC regs to David Marks and references to NC task time study .4	\$500.00	0.4	\$200.00								
4/13/2020	Jim Thornton	Calls with David Marks regarding NC task time study .7	\$500.00	0.7	\$350.00								
4/13/2020	Jim Thornton	Calls with Blake Peters regarding analysis of census .4	\$500.00	0.4	\$200.00								
4/13/2020	Jim Thornton	Received and reviewed email from Chris Healey regarding Sunrise methodologies for staffing .2	\$500.00	0.2	\$100.00								
4/13/2020	Jim Thornton	Received and reviewed updated actual/target analysis from Blake Peters .4	\$500.00	0.4	\$200.00								
4/14/2020	David Marks	GoToMeeting with Attorney Thornton re: NC task time study 1.50	\$950.00	1.5	\$1,425.00								
4/14/2020	David Marks	Teleconference with Attorney Thornton regarding Sunrise questions about discovery .20	\$950.00	0.2	\$190.00								
4/14/2020	David Marks	Teleconference with Attorney Healey regarding analysis and systemic flaws 1.20	\$950.00	1.2	\$1,140.00								
4/14/2020	David Marks	Teleconference with Attorney C. Healey and Attorney Thamer regarding Sunrise staffing approach (1.00)	\$950.00	1	\$950.00								

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				Worked		General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
4/14/2020	David Marks	Follow up teleconference with Attorney C. Healey regarding Sunrise staffing approach .30	\$950.00	0.3	\$285.00								
4/14/2020	Jim Thornton	GoToMeeting with David Marks regarding NC task time study .15	\$500.00	1.5	\$750.00								
4/14/2020	Jim Thornton	Texts and call with Blake Peters regarding assessments .3	\$500.00	0.3	\$150.00								
4/14/2020	Jim Thornton	GoToMeeting w/Blake Peters regarding analysis, pay code questions, and employee job titles .3	\$500.00	0.3	\$150.00								
4/14/2020	Jim Thornton	Received and reviewed emails regarding various projects from Blake Peters regarding same .4	\$500.00	0.4	\$200.00								
4/14/2020	Jim Thornton	Work on discovery issues related to the staffing data and sent email to David Marks with updated list of questions .9	\$500.00	0.9	\$450.00								
4/14/2020	Jim Thornton	Calls with David Marks regarding discovery .14	\$500.00	1.4	\$700.00								
4/14/2020	Jim Thornton	Texts with Dale Schroyer regarding data availability .1	\$500.00	0.1	\$50.00								
4/14/2020	Jim Thornton	Call with David Marks regarding Sunrise discovery .2	\$500.00	0.2	\$100.00								
4/15/2020	David Marks	GoToMeeting with Attorney Thornton regarding Sunrise discovery .90	\$950.00	1.9	\$1,805.00								
4/15/2020	Jim Thornton	Work on discovery review and Apolinario depo exhibits .14	\$500.00	1.4	\$700.00								
4/15/2020	Jim Thornton	Emails to David Marks regarding questions from yesterday .2	\$500.00	0.2	\$100.00								
4/15/2020	Jim Thornton	GoToMeeting w/ David Marks regarding Sunrise documents needed .19	\$500.00	1.9	\$950.00								
4/15/2020	Jim Thornton	Work on staffing with Blake Peters on GoToMeeting .4	\$500.00	0.4	\$200.00								
4/15/2020	Jim Thornton	Calls with Dale Schroyer regarding required inputs .9	\$500.00	0.9	\$450.00								
4/15/2020	Jim Thornton	Calls with Blake Peters regarding staffing analysis and SUN0004690 .7	\$500.00	0.7	\$350.00								
4/15/2020	Jim Thornton	Prepared list of questions regarding task time data .6	\$500.00	0.6	\$300.00								
4/16/2020	David Marks	Review Sunrise discovery problem .60	\$950.00	0.6	\$570.00								
4/16/2020	David Marks	Review of Sunrise assessment, points and target hours .110	\$950.00	1.1	\$1,045.00								
4/16/2020	David Marks	Review NC depo for task times and exhibits .140	\$950.00	1.4	\$1,330.00								
4/16/2020	David Marks	Teleconference with Attorney Thornton re: discover and review of Chris Healey Draft letter to counsel re searchable pdf assessment data .90	\$950.00	0.9	\$855.00								
4/16/2020	Diane Asher	Draft letter to counsel re: searchable pdf assessment	\$85.00	0.5	\$42.50								
4/16/2020	Jim Thornton	Work on list of Sunrise discovery issues .9	\$500.00	0.9	\$450.00								
4/16/2020	Jim Thornton	Call w/David Marks regarding discovery and review of Chris Healey draft letter to counsel re searchable pdf assessment data .9	\$500.00	0.9	\$450.00								
4/16/2020	Jim Thornton	Received and reviewed actual hours breakdown analysis from Blake Peters .4	\$500.00	0.4	\$200.00								
4/16/2020	Jim Thornton	Prep for meeting with Dr. Cristina Flores .5	\$500.00	0.5	\$250.00								
4/16/2020	Jim Thornton	Calls with Dr. Cristina Flores .18	\$500.00	1.8	\$900.00								
4/16/2020	Jim Thornton	Received and reviewed email regarding Tuesday call with team .1	\$500.00	0.1	\$50.00								
4/16/2020	Jim Thornton	Received and reviewed emails from Brian Umpierre and California team regarding Sunrise and custom pull of data from outside vendors .8	\$500.00	0.8	\$400.00								
4/16/2020	Jim Thornton	Email to David Marks regarding outside vendor question and how that relates to Sunrise's own database .3	\$500.00	0.3	\$150.00								
4/16/2020	Jim Thornton	Email to David Marks regarding comma-limited database info not requiring any special report .2	\$500.00	0.2	\$100.00								
4/17/2020	David Marks	GoToMeeting with Attorney Thornton regarding review of exhibits produced and staffing methodology .390	\$950.00	3.9	\$3,705.00								

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						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
4/17/2020	David Marks	GoToMeeting with Attorney Thornton regarding Sunrise documents produced .60	\$950.00	0.6	\$570.00								
4/17/2020	David Marks	Teleconference with Attorney Thornton re: key data .30	\$950.00	0.3	\$285.00								
4/17/2020	David Marks	Teleconference with CA Team regarding task time analysis and related issues 1.60	\$950.00	1.6	\$1,520.00			1.6	1520				
4/17/2020	Jim Thornton	Lengthy GoToMeetings w/David Marks regarding Sunrise staffing methodology and made notes of key docs 4.5	\$500.00	4.5	\$2,250.00								
4/17/2020	Jim Thornton	Work on staffing points/service levels 1.3	\$500.00	1.3	\$650.00								
4/17/2020	Jim Thornton	Email to team regarding reviewed docs .3	\$500.00	0.3	\$150.00								
4/17/2020	Jim Thornton	Calls with David Marks regarding key data .3	\$500.00	0.3	\$150.00								
4/17/2020	Jim Thornton	Received and reviewed multiple emails regarding depo exhibits and service levels .4	\$500.00	0.4	\$200.00								
4/17/2020	Jim Thornton	Received and reviewed email from Chris Healey regarding Budget Assumption docs .2	\$500.00	0.2	\$100.00								
4/18/2020	David Marks	Review of emails, and organization of To Do's 1.30	\$950.00	1.3	\$1,235.00								
4/18/2020	Jim Thornton	Received and reviewed Budget Assumption docs from Tracy Myrick .2	\$500.00	0.2	\$100.00								
4/18/2020	Jim Thornton	Email from Chris Healey regarding document issues .3	\$500.00	0.3	\$150.00								
4/19/2020	Jim Thornton	Received and reviewed follow up email from Chris Healey regarding document issues .3	\$500.00	0.3	\$150.00								
4/20/2020	David Marks	Review NC task time study - Appendix 3, Sabrena Lea depo, Appendix 2, Kevin Goddard depo, and Cassandra McFadden depo 3.70	\$950.00	3.7	\$3,515.00								
4/20/2020	Jim Thornton	Email from Chris Healey regarding bates number reference for task time questions .1	\$500.00	0.1	\$50.00								
4/20/2020	Jim Thornton	Work on pulling task time examples and drafting detailed explanation 1.6	\$500.00	1.6	\$800.00								
4/20/2020	Jim Thornton	Received and reviewed email from Brian Umpierre regarding meet and confer letter .3	\$500.00	0.3	\$150.00								
4/21/2020	David Marks	Review of NC task time evidence, Kevin Goddard depo, Appendix 12, MPSJ Brief and Order on SJ 1.90	\$950.00	1.9	\$1,805.00								
4/21/2020	David Marks	Teleconference with Attorney Thornton regarding B. Peters' analysis of hours per resident .10	\$950.00	0.1	\$95.00								
4/21/2020	Jim Thornton	Work on task time study info with Dr. Cristina Flores .5	\$500.00	0.5	\$250.00								
4/21/2020	Jim Thornton	Sent to David Marks .2	\$500.00	0.2	\$100.00								
4/21/2020	Jim Thornton	Emails to David Marks regarding unique resident identifiers and database format .4	\$500.00	0.4	\$200.00								
4/21/2020	Jim Thornton	Work with David Marks and sent proposed email to Chris Healey .9	\$500.00	0.9	\$450.00								
4/21/2020	Jim Thornton	Work on .pdf assessment data 3.3	\$500.00	3.3	\$1,650.00								
4/21/2020	Jim Thornton	Call with David Marks regarding analysis of hours per resident .1	\$500.00	0.1	\$50.00								
4/22/2020	David Marks	Teleconference with Attorney Thornton regarding Sunrise template 1.60	\$950.00	1.6	\$1,520.00								
4/22/2020	David Marks	Compose email to CA Team regarding questions for 30b(6) regarding task time study .60	\$950.00	0.6	\$570.00								
4/22/2020	David Marks	GoToMeeting with Attorney Thornton re: Dr. Christina Flores task time studies 1.20	\$950.00	1.2	\$1,140.00								
4/22/2020	Jim Thornton	GoToMeeting with David Marks regarding Dr. Cristina Flores task time studies 1.2	\$500.00	1.2	\$600.00								

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						<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
4/22/2020	Jim Thornton	Calls with David Marks regarding Dr. Cristina Flores task time studies 1.6	\$500.00	1.6	\$800.00								
4/22/2020	Jim Thornton	Texts with Blake Peters regarding assessment data .1	\$500.00	0.1	\$50.00								
4/22/2020	Jim Thornton	Text with Dale Schroyer re: data for models .2	\$500.00	0.2	\$100.00								
4/23/2020	David Marks	Teleconference with home health expert Monica Trudeau, RN, regarding Sunrise issues .20	\$950.00	0.2	\$190.00								
4/23/2020	David Marks	Teleconference with Dr. David Belson regarding ALF mode .50	\$950.00	0.5	\$475.00								
4/23/2020	David Marks	Teleconference with Attorney Thornton 1.40	\$950.00	1.4	\$1,330.00								
4/23/2020	Jim Thornton	Work on creating a Sunrise assessment template with 400+ fields 5.4	\$500.00	5.4	\$2,700.00								
4/23/2020	Jim Thornton	Call with David Marks regarding assessments 1.4	\$500.00	1.4	\$700.00								
4/24/2020	David Marks	Teleconference with Attorney Thornton regarding Sunrise analysis .40	\$950.00	0.4	\$380.00								
4/24/2020	David Marks	Teleconference with Attorney Healey regarding Sunrise template, PPDs for each facility, and quarterly complaints .70	\$950.00	0.7	\$665.00								
4/24/2020	Jim Thornton	Scheduled meeting with assessment data extraction team for next week to go over format of assessment .2	\$500.00	0.2	\$100.00								
4/24/2020	Jim Thornton	Prep for assessment data extraction meeting 3.2	\$500.00	3.2	\$1,600.00								
4/24/2020	Jim Thornton	Call with David Marks regarding Sunrise staffing analysis .4	\$500.00	0.4	\$200.00								
4/27/2020	David Marks	Meeting with Chrystal Asher regarding coding project .10	\$950.00	0.1	\$95.00								
4/27/2020	David Marks	Teleconference with Attorney Thornton regarding coding project .20	\$950.00	0.2	\$190.00								
4/27/2020	Diane Asher	Meeting with Attorney Marks re: coding project	\$85.00	0.1	\$8.50								
4/27/2020	Jim Thornton	Email to Tracy Myrick regarding text file docs .3	\$500.00	0.3	\$150.00								
4/27/2020	Jim Thornton	Emails with Chris Healey regarding data extraction and facility choice .4	\$500.00	0.4	\$200.00								
4/27/2020	Jim Thornton	Work with Tracy Myrick regarding San Mateo docs .3	\$500.00	0.3	\$150.00								
4/27/2020	Jim Thornton	Prep for data extraction meeting 2.1	\$500.00	2.1	\$1,050.00								
4/27/2020	Jim Thornton	Data extraction team GoToMeeting reviewing assessment data extraction process 1.0	\$500.00	1	\$500.00								
4/27/2020	Jim Thornton	Numerous emails related to assessment data extraction .6	\$500.00	0.6	\$300.00								
4/27/2020	Jim Thornton	Work on template for assessment data extraction .4	\$500.00	0.4	\$200.00								
4/27/2020	Jim Thornton	Sent template to team with instructions .4	\$500.00	0.4	\$200.00								
4/27/2020	Jim Thornton	Telephone call with David Marks regarding coding project .2	\$500.00	0.2	\$100.00								
4/28/2020	David Marks	Sunrise depo prep for 30b(6) depo 1.00	\$950.00	1	\$950.00								
4/28/2020	David Marks	Teleconference with Attorney Healey regarding task time questions and quarterly date 1.20	\$950.00	1.2	\$1,140.00								
4/28/2020	Jim Thornton	Emails and call with Chrystal Asher regarding data extraction .4	\$500.00	0.4	\$200.00								
4/28/2020	Jim Thornton	Prepared and sent to David Marks list of questions regarding task time study by Sunrise and examples of issues .8	\$500.00	0.8	\$400.00								
4/29/2020	David Marks	Teleconference with Attorney Thornton regarding Sunrise data extraction .70	\$950.00	0.7	\$665.00								
4/29/2020	Jim Thornton	Pulled and sent David Marks example of Sunrise combined task time that is illogical and undefined .8	\$500.00	0.8	\$400.00								
4/29/2020	Jim Thornton	Emails to/from data extraction team .4	\$500.00	0.4	\$200.00								
4/29/2020	Jim Thornton	Call with David Marks regarding Sunrise assessment data extraction project .7	\$500.00	0.7	\$350.00								
4/30/2020	Jim Thornton	Emails regarding meet and confer .3	\$500.00	0.3	\$150.00								
4/30/2020	Jim Thornton	Emails to and from data extraction team .5	\$500.00	0.5	\$250.00								
4/30/2020	Jim Thornton	Sent David Marks SUN003134 and 4682 .2	\$500.00	0.2	\$100.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked		General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
5/1/2020	David Marks	Review Rubik's and create slides for Monday presentation 5.20	\$950.00	5.2	\$4,940.00								
5/1/2020	Jim Thornton	Emails to and from data extraction team .4	\$500.00	0.4	\$200.00								
5/1/2020	Jim Thornton	Work on form issues 1.2	\$500.00	1.2	\$600.00								
5/1/2020	Jim Thornton	Email to Chris Healey regarding projections based on data and time per extraction .3	\$500.00	0.3	\$150.00								
5/1/2020	Jim Thornton	Work on data extraction project 1.2	\$500.00	1.2	\$600.00								
5/4/2020	David Marks	Review resident category vs. target hour correlation .10	\$950.00	0.1	\$95.00								
5/4/2020	David Marks	Review 4.30.20 email from Attorney Thornton regarding resident category vs. target hour correlation .60	\$950.00	0.6	\$570.00								
5/4/2020	David Marks	Compose email to CA Team regarding questions .20	\$950.00	0.2	\$190.00								
5/4/2020	Jim Thornton	Email to Brian Umpierre regarding call .2	\$500.00	0.2	\$100.00								
5/4/2020	Jim Thornton	Emails to and from data extraction team .6	\$500.00	0.6	\$300.00								
5/5/2020	David Marks	Compose/respond to Attorney Healey email regarding expert declaration .10	\$950.00	0.1	\$95.00								
5/5/2020	David Marks	Create analysis logic for staffing target per Sunrise documents 1.00	\$950.00	1	\$950.00								
5/5/2020	David Marks	Review multiple emails regarding certification declarations .20	\$950.00	0.2	\$190.00								
5/5/2020	David Marks	Review of Attorney Wallace's draft declaration for Dr. Cristina Flores .50	\$950.00	0.5	\$475.00								
5/6/2020	David Marks	Compose email to CA Team regarding budgeted vs. target staff .30	\$950.00	0.3	\$285.00								
5/6/2020	David Marks	Teleconference with Attorney Thornton regarding same .10	\$950.00	0.1	\$95.00								
5/6/2020	David Marks	Review of Sunrise actual staffing levels .20	\$950.00	0.2	\$190.00								
5/6/2020	David Marks	Teleconference with Attorney Thornton regarding declaration analysis for Dr. Cristina Flores .60	\$950.00	0.6	\$570.00								
5/6/2020	David Marks	GoToMeeting with Attorney Thornton and B. Peters regarding targeted hours for Sunrise staffing 1.70	\$950.00	1.7	\$1,615.00								
5/6/2020	Jim Thornton	GoToMeeting w/David Marks and Blake Peters regarding targeted hours for Sunrise staffing 1.7	\$500.00	1.7	\$850.00								
5/6/2020	Jim Thornton	Work on conversion of San Mateo data and sent to Blake Peters and David Marks .8	\$500.00	0.8	\$400.00								
5/6/2020	Jim Thornton	Work with Blake Peters regarding census from budget SUN004682 .5	\$500.00	0.5	\$250.00								
5/6/2020	Jim Thornton	Emails to and from data extraction team .6	\$500.00	0.6	\$300.00								
5/6/2020	Jim Thornton	Work on matrix of permutations 3.8	\$500.00	3.8	\$1,900.00								
5/6/2020	Jim Thornton	Calls with David Marks .7	\$500.00	0.7	\$350.00								
5/6/2020	Jim Thornton	Texts with Blake Peters .2	\$500.00	0.2	\$100.00								
5/7/2020	David Marks	Teleconference with B. Peters regarding actual monthly staffing vs. target formula for San Mateo facility .20	\$950.00	0.2	\$190.00								
5/7/2020	David Marks	Review of Attorney Wallace's proposed declaration for Dr. Cristina Flores .10	\$950.00	0.1	\$95.00								
5/7/2020	David Marks	Teleconference with B. Peters regarding preliminary findings of targeted vs. actual staffing .70	\$950.00	0.7	\$665.00								
5/7/2020	David Marks	Review Attorney Wallace's proposed declaration for Dr. Cristina Flores .50	\$950.00	0.5	\$475.00								
5/7/2020	David Marks	GoToMeeting with Attorney Thornton and B. Peters regarding correlation study of acuity vs. staffing and Carmichael issues 3.90	\$950.00	3.9	\$3,705.00								
5/7/2020	David Marks	Teleconference with Attorney Thornton regarding Attorney Wallace's declaration 2.00	\$950.00	2	\$1,900.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
5/7/2020	David Marks	Teleconference with Attorney Thornton and B. Peters regarding correlations for remainder facilities .10	\$950.00	0.1		\$95.00								
5/7/2020	David Marks	Review correlation point vs. actual staffing .10	\$950.00	0.1		\$95.00								
5/7/2020	David Marks	Teleconference with Dr. Cristina Flores regarding national health stats regarding average Care Manager .30	\$950.00	0.3		\$285.00								
5/7/2020	David Marks	Teleconference with Attorney Thornton regarding point matrix vs. Dr. Cristina Flores task time .20	\$950.00	0.2		\$190.00								
5/7/2020	David Marks	Teleconference with CA Team regarding draft declaration of Dr. Cristina Flores 1.50	\$950.00	1.5		\$1,425.00			1.5	1425				
5/7/2020	David Marks	Teleconference and email to Dr. Cristina Flores regarding declaration .20	\$950.00	0.2		\$190.00								
5/7/2020	Diane Asher	Assist in drafting of Dr. Cristina Flores declaration	\$85.00	0.8		\$68.00								
5/7/2020	Jim Thornton	Work with Blake Peters regarding San Mateo conversion doc .5	\$500.00	0.5		\$250.00								
5/7/2020	Jim Thornton	GoToMeetings w/David Marks and Blake Peters regarding data and Carmichael issues 3.9	\$500.00	3.9		\$1,950.00								
5/7/2020	Jim Thornton	Emails to and from data extraction team .6	\$500.00	0.6		\$300.00								
5/7/2020	Jim Thornton	Work on theory for case and permutations matrix 3.1	\$500.00	3.1		\$1,550.00								
5/7/2020	Jim Thornton	Calls and texts with Blake Peters .6	\$500.00	0.6		\$300.00								
5/7/2020	Jim Thornton	Call with Dr. Cristina Flores .1	\$500.00	0.1		\$50.00								
5/7/2020	Jim Thornton	Call with David Marks regarding Wallace declaration 2.0	\$500.00	2		\$1,000.00								
5/7/2020	Jim Thornton	Telephone call with David Marks and Blake Peters regarding correlations for remainder facilities .1	\$500.00	0.1		\$50.00								
5/7/2020	Jim Thornton	Call with David Marks regarding point matrix vs. Dr. Cristina Flores task time .2	\$500.00	0.2		\$100.00								
5/8/2020	David Marks	Compose a To Do list regarding Dr. Cristina Flores declaration .20	\$950.00	0.2		\$190.00								
5/8/2020	David Marks	Teleconference with Attorney Thornton to work on creating an outline of Dr. Cristina Flores declaration, and regarding status of Sunrise staffing template .30	\$950.00	0.3		\$285.00								
5/8/2020	David Marks	Teleconference with B. Peters regarding correlation study and regarding matrix of possible service per service level category and number of service combinations that exceed Sunrise allotted time .70	\$950.00	0.7		\$665.00								
5/8/2020	David Marks	Work on declaration of Dr. Cristina Flores - review/edit Attorney Wallace's draft declaration, and create outline of key topics .50	\$950.00	0.5		\$475.00								
5/8/2020	David Marks	Receipt and review email from Attorney Healey regarding Terrace Club points and documents, and compose email to Attorney Thornton and B. Peters regarding same .10	\$950.00	0.1		\$95.00								
5/8/2020	David Marks	GoToMeeting with Attorney Thornton to discuss and create outline for Dr. Cristina Flores declaration 1.5	\$950.00	1.5		\$1,425.00								
5/8/2020	David Marks	Compose email to CA Team regarding same .20	\$950.00	0.2		\$190.00								
5/8/2020	David Marks	Teleconference with Attorney Thornton regarding status of correlation .20	\$950.00	0.2		\$190.00								
5/8/2020	David Marks	Teleconference with Attorney Thornton regarding status of call with Dr. Cristina Flores regarding target staffing defects .10	\$950.00	0.1		\$95.00								
5/8/2020	David Marks	Teleconference with Attorney Thornton regarding correlation project .30	\$950.00	0.3		\$285.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
5/8/2020	David Marks	Teleconference with Attorney Thornton regarding placing a call to Dr. Cristina Flores about cueing, supervision, and stand-by assist = 1 person assist .10	\$950.00	0.1	\$95.00								
5/8/2020	Diane Asher	Continue with assisting of draft Dr. Cristina Flores declaration	\$85.00	0.6	\$51.00								
5/8/2020	Jim Thornton	Detailed email to data extraction team regarding short form and completion 1.2	\$500.00	1.2	\$600.00								
5/8/2020	Jim Thornton	GoToMeeting w/David Marks regarding Sunrise Flores declaration outline and structure 1.5	\$500.00	1.5	\$750.00								
5/8/2020	Jim Thornton	Continue work on theory for case and permutations concept 2.3	\$500.00	2.3	\$1,150.00								
5/8/2020	Jim Thornton	GoToMeeting w/Blake Peters regarding permutations analysis 1.0	\$500.00	1	\$500.00								
5/8/2020	Jim Thornton	Call to Dr. Cristina Flores regarding meeting set up .1	\$500.00	0.1	\$50.00								
5/8/2020	Jim Thornton	GoToMeeting w/Dr. Cristina Flores regarding permutations analysis .8	\$500.00	0.8	\$400.00								
5/8/2020	Jim Thornton	Work on correlational study of PPD and points and sent to David Marks 2.2	\$500.00	2.2	\$1,100.00								
5/8/2020	Jim Thornton	Calls and texts with Blake Peters regarding analyses .4	\$500.00	0.4	\$200.00								
5/8/2020	Jim Thornton	Call with David Marks regarding permutations analysis 1.0	\$500.00	1	\$500.00								
5/9/2020	Jim Thornton	Work on and sent points matrix to Blake Peters and David Marks 2.3	\$500.00	2.3	\$1,150.00								
5/10/2020	David Marks	Teleconference with Attorney Thornton regarding status of Dr. Cristina Flores declaration .30	\$950.00	0.3	\$285.00								
5/10/2020	David Marks	Review B. Peters staffing analysis .40	\$950.00	0.4	\$380.00								
5/10/2020	David Marks	Teleconference with B. Peters regarding staffing in all facilities by year .10	\$950.00	0.1	\$95.00								
5/10/2020	David Marks	Review of Attorney Healey draft of Dr. Cristina Flores declaration and exhibits for use in declaration 1.70	\$950.00	1.7	\$1,615.00								
5/10/2020	David Marks	Review B. Peters update Care Manager staffing .10	\$950.00	0.1	\$95.00								
5/10/2020	David Marks	Review and edit of Dr. Cristina Flores declaration integrating key evidence 2.20	\$950.00	2.2	\$2,090.00								
5/10/2020	David Marks	Continue review of key evidence for Dr. Cristina Flores declaration .20	\$950.00	0.2	\$190.00								
5/10/2020	David Marks	Teleconference with Attorney Thornton regarding status of edits to Dr. Cristina Flores declaration .10	\$950.00	0.1	\$95.00								
5/10/2020	David Marks	Review of Attorney Wallace and Attorney Thornton drafts of Dr. Cristina Flores declaration 1.40	\$950.00	1.4	\$1,330.00								
5/10/2020	David Marks	GoToMeeting with Attorney Thornton regarding Dr. Cristina Flores declaration edits 2.50	\$950.00	2.5	\$2,375.00								
5/10/2020	Jim Thornton	GoToMeeting with David Marks related to permutations and Flores opinions (2.5)	\$500.00	2.5	\$1,250.00								
5/11/2020	David Marks	Teleconference with Attorney Healey regarding permutation analysis/Dr. Cristina Flores declaration .50	\$950.00	0.5	\$475.00								
5/11/2020	David Marks	Review of Attorney draft of Dr. Cristina Flores declaration .60	\$950.00	0.6	\$570.00								
5/11/2020	David Marks	GoToMeeting w/Attorney Thornton regarding Dr. Cristina Flores dec 2.4	\$950.00	2.4	\$2,280.00								
5/11/2020	David Marks	Teleconference with Attorney Thornton regarding Dr. Cristina Flores analysis .6	\$950.00	0.6	\$570.00								
5/11/2020	Diane Asher	Assist in editing of Dr. Cristina Flores declaration	\$85.00	0.5	\$42.50								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
5/11/2020	Jim Thornton	Prepared and sent David Marks task times and frequencies for permutations analysis and comparison to Sunrise target hours per service level 3.1	\$500.00	3.1	\$1,550.00								
5/11/2020	Jim Thornton	Work on Dr. Cristina Flores dec with David Marks 1.9	\$500.00	1.9	\$950.00								
5/11/2020	Jim Thornton	GoToMeeting with David Marks regarding Dr. Cristina Flores dec 2.4	\$500.00	2.4	\$1,200.00								
5/11/2020	Jim Thornton	Prepared summary tables for Flores dec 1.4	\$500.00	1.4	\$700.00								
5/11/2020	Jim Thornton	Sent summary tables for Flores dec to David Marks .2	\$500.00	0.2	\$100.00								
5/11/2020	Jim Thornton	Call with Dr. Cristina Flores regarding dec .4	\$500.00	0.4	\$200.00								
5/11/2020	Jim Thornton	Call with David Marks regarding Dr. Cristina Flores analysis .6	\$500.00	0.6	\$300.00								
5/12/2020	David Marks	Discuss with Diane Asher the draft declaration of Dr. Cristina Flores .10	\$950.00	0.1	\$95.00								
5/12/2020	David Marks	Review multiple edits to draft declaration of Dr. Cristina Flores 8.3	\$950.00	8.3	\$7,885.00		8.3		\$7,885.00				
5/12/2020	David Marks	Work with Diane Asher to reorganize, re-outline and add sections to declaration 1.7	\$950.00	1.7	\$1,615.00								
5/12/2020	David Marks	Teleconference with Attorney Thornton regarding status of base service .40	\$950.00	0.4	\$380.00								
5/12/2020	David Marks	Receive and review of email from Attorney Thornton regarding base services .10	\$950.00	0.1	\$95.00								
5/12/2020	David Marks	Teleconference with B. Peters regarding census derived from billing history vs. 6 months per year reported census .20	\$950.00	0.2	\$190.00								
5/12/2020	Diane Asher	Confer with Attorney Marks re: Dr. Cristina Flores declaration	\$85.00	0.1	\$8.50								
5/12/2020	Diane Asher	Assist with reorganizing, re-outlining and adding sections to Dr. Cristina Flores declaration	\$85.00	10	\$850.00		10		\$850.00				
5/12/2020	Jim Thornton	W/on target hours analysis for Dr. Cristina Flores 2.1	\$500.00	2.1	\$1,050.00								
5/12/2020	Jim Thornton	Texts and calls with Blake Peters regarding target hours analysis .3	\$500.00	0.3	\$150.00								
5/12/2020	Jim Thornton	GoToMeeting w/Blake Peters regarding analysis for Dr. Cristina Flores .4	\$500.00	0.4	\$200.00								
5/12/2020	Jim Thornton	Email to David Marks regarding base service definitions .4	\$500.00	0.4	\$200.00								
5/12/2020	Jim Thornton	Calls regarding base service definition with David Marks .4	\$500.00	0.4	\$200.00								
5/12/2020	Jim Thornton	Emails to and from data extraction team .6	\$500.00	0.6	\$300.00								
5/12/2020	Jim Thornton	Work on tables for inclusion in Dr. Cristina Flores dec with Blake Peters .9	\$500.00	0.9	\$450.00								
5/12/2020	Jim Thornton	Continue work on Dr. Cristina Flores dec 3.5	\$500.00	3.5	\$1,750.00								
5/12/2020	Jim Thornton	Pulled California regs for dec .4	\$500.00	0.4	\$200.00								
5/13/2020	David Marks	Teleconference with Attorney Thornton regarding unlikely surplus of base services, service plan counts, defect in staffing policy, and staffing formula defect .70	\$950.00	0.7	\$665.00								
5/13/2020	David Marks	Teleconference with B. Peters regarding Attorney Healey questions regarding Terrace Club .20	\$950.00	0.2	\$190.00								
5/13/2020	David Marks	Review and edit Dr. Cristina Flores declaration 2.70	\$950.00	2.7	\$2,565.00								
5/13/2020	David Marks	Continue edit of Dr. Cristina Flores declaration - dictating changes to Diane Asher regarding staffing forms 6.60	\$950.00	6.6	\$6,270.00		6.6		\$6,270.00				
5/13/2020	David Marks	Compose email to Attorney Healey regarding need for exhibits and progress report on Dr. Cristina Flores draft .10	\$950.00	0.1	\$95.00								
5/13/2020	Diane Asher	Work with Attorney Marks re: Dr. Cristina Flores declaration	\$85.00	6.6	\$561.00		6.6		\$561.00				
5/13/2020	Jim Thornton	Continued work on permutations analysis per Dr. Cristina Flores 3.2	\$500.00	3.2	\$1,600.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
5/13/2020	Jim Thornton	Call and texts with Dale Schroyer in advance of meeting regarding permutations .3	\$500.00	0.3		\$150.00								
5/13/2020	Jim Thornton	GoToMeeting w/Dale Schroyer going over permutations and seeking assistance with statistical analysis .9	\$500.00	0.9		\$450.00								
5/13/2020	Jim Thornton	Sent Dale Schroyer latest sets of analysis .2	\$500.00	0.2		\$100.00								
5/13/2020	Jim Thornton	Sent David Marks sunrise care level screenshots and explanation .8	\$500.00	0.8		\$400.00								
5/13/2020	Jim Thornton	Calls w/David Marks .7	\$500.00	0.7		\$350.00								
5/14/2020	David Marks	Teleconference with Attorney Thornton regarding Dr. Cristina Flores draft declaration - incentive packs .50	\$950.00	0.5		\$475.00								
5/14/2020	David Marks	Teleconference with B. Peters regarding incentive packs .10	\$950.00	0.1		\$95.00								
5/14/2020	David Marks	Teleconference and work with Diane Asher on an email to Attorney Healey with exhibits to Dr. Cristina Flores declaration .30	\$950.00	0.3		\$285.00								
5/14/2020	David Marks	Teleconference with Diane Asher regarding edits/need for exhibit names/references .10	\$950.00	0.1		\$95.00								
5/14/2020	David Marks	Compose email regarding same to Attorney Healey .10	\$950.00	0.1		\$95.00								
5/14/2020	David Marks	Work on Dr. Cristina Flores declaration edits and revisions 4.70	\$950.00	4.7		\$4,465.00								
5/14/2020	David Marks	GoToMeeting with Attorney Thornton regarding edits (on permutation analysis) to Dr. Cristina Flores declaration 1.50	\$950.00	1.5		\$1,425.00								
5/14/2020	David Marks	Additional GoToMeeting with Attorney Thornton regarding Dr. Cristina Flores declaration 1.80	\$950.00	1.8		\$1,710.00								
5/14/2020	David Marks	Continue edits/revisions of Dr. Cristina Flores declaration 1.8	\$950.00	1.8		\$1,710.00								
5/14/2020	David Marks	Compose email to CA Team regarding same 0.2	\$950.00	0.2		\$190.00								
5/14/2020	Diane Asher	Assist Attorney Marks re: emails to co-counsel	\$85.00	0.3		\$25.50								
5/14/2020	Jim Thornton	GoToMeetings w/Blake Peters regarding analysis for Dr. Cristina Flores 2.1	\$500.00	2.1		\$1,050.00								
5/14/2020	Jim Thornton	GoToMeeting w/ Richard Feldman regarding permutations 1.2	\$500.00	1.2		\$600.00								
5/14/2020	Jim Thornton	GoToMeetings with David Marks regarding Dr. Cristina Flores dec 3.3	\$500.00	3.3		\$1,650.00								
5/14/2020	Jim Thornton	Calls with Blake Peters regarding analyses 1.3	\$500.00	1.3		\$650.00								
5/14/2020	Jim Thornton	Calls with David Marks regarding status of analyses .5	\$500.00	0.5		\$250.00								
5/14/2020	Jim Thornton	Texts with Dale Schroyer regarding status of time distributions analysis .2	\$500.00	0.2		\$100.00								
5/15/2020	David Marks	Receipt and review email from Attorney Healey regarding suggested changes to Dr. Cristina Flores declaration .20	\$950.00	0.2		\$190.00								
5/15/2020	David Marks	GoToMeeting with Attorney Thornton regarding edits to same 1.30	\$950.00	1.3		\$1,235.00								
5/15/2020	David Marks	Work with Diane Asher to complete final draft of Dr. Cristina Flores declaration 10.30	\$950.00	10.3		\$9,785.00	10.3	\$9,785.00						
5/15/2020	David Marks	Receipt and review evidence emails from Attorneys Healey and Thornton (evidence attached) .30	\$950.00	0.3		\$285.00								
5/15/2020	David Marks	Additional GoToMeeting with Attorney Thornton re Dale Schroyer Declaration 1.00	\$950.00	1		\$950.00								
5/15/2020	David Marks	Teleconference with Attorney Thornton 1.30	\$950.00	1.3		\$1,235.00								
5/15/2020	David Marks	Teleconference with Attorney C. Healey regarding Flores declaration .40	\$950.00	0.4		\$380.00								
5/15/2020	Diane Asher	Work with Attorney Marks re: Dr. Cristina Flores declaration	\$85.00	10.3		\$875.50	10.3	\$875.50						
5/15/2020	Jim Thornton	GoToMeetings with David Marks and Blake Peters regarding Dr. Cristina Flores dec 1.3	\$500.00	1.3		\$650.00								

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5/15/2020	Jim Thornton	Prepped rough of Dale Schroyer dec and sent to David Marks 1.2	\$500.00	1.2	\$600.00								
5/15/2020	Jim Thornton	Finalized and sent permutations tables for Dr. Cristina Flores dec to David Marks 1.8	\$500.00	1.8	\$900.00								
5/15/2020	Jim Thornton	Emails with Diane Asher regarding named ALFs in case .3	\$500.00	0.3	\$150.00								
5/15/2020	Jim Thornton	Updated tables to include % of population in each service level and sent to team .8	\$500.00	0.8	\$400.00								
5/15/2020	Jim Thornton	GoToMeeting w/David Marks regarding Dale Schroyer dec-sent Dale Schroyer dec to California team for review 1.0	\$500.00	1	\$500.00								
5/15/2020	Jim Thornton	Sent to Dale Schroyer for review and signature .3	\$500.00	0.3	\$150.00								
5/15/2020	Jim Thornton	Calls and texts with Blake Peters .5	\$500.00	0.5	\$250.00								
5/15/2020	Jim Thornton	Calls with David Marks 1.3	\$500.00	1.3	\$650.00								
5/16/2020	David Marks	GoToMeeting with Attorney Thornton and Dr. Cristina Flores to discuss, review and edit declaration and exhibits to same 2.20	\$950.00	2.2	\$2,090.00								
5/16/2020	David Marks	Review brief regarding Dr. Cristina Flores declaration summary .50	\$950.00	0.5	\$475.00								
5/16/2020	David Marks	Review and edit brief from Attorney Healey regarding Dr. Cristina Flores findings .70	\$950.00	0.7	\$665.00								
5/16/2020	Jim Thornton	Work on latest draft of Dr. Cristina Flores dec and proofed same 3.8	\$500.00	3.8	\$1,900.00								
5/16/2020	Jim Thornton	GoToMeeting w/Dr. Cristina Flores and David Marks regarding draft of Flores dec 2.2	\$500.00	2.2	\$1,100.00								
5/17/2020	David Marks	Teleconference with Attorney Thornton regarding Flores dec .2	\$950.00	0.2	\$190.00								
5/17/2020	Jim Thornton	Continued work on Dr. Cristina Flores dec and sent to Dr. Cristina Flores and David Marks 3.3	\$500.00	3.3	\$1,650.00								
5/17/2020	Jim Thornton	Calls with David Marks regarding Flores dec .2	\$500.00	0.2	\$100.00								
5/17/2020	Jim Thornton	Brief call with Dr. Cristina Flores regarding her dec .1	\$500.00	0.1	\$50.00								
5/18/2020	David Marks	GoToMeeting with Attorney Thornton work on revisions/edits and additions to class cert. brief 2.20	\$950.00	2.2	\$2,090.00								
5/18/2020	David Marks	Work on my declaration in support of MTC Sunrise discovery .40	\$950.00	0.4	\$380.00								
5/18/2020	David Marks	Review declaration of Pat Kennedy concentrating on paragraphs addressing areas regarding Dr. Cristina Flores 1.50	\$950.00	1.5	\$1,425.00								
5/18/2020	David Marks	Review multiple emails regarding Dr. Cristina Flores declaration and exhibits, Pat Kennedy declaration and brief 1.30	\$950.00	1.3	\$1,235.00								
5/18/2020	David Marks	Work on expense reconciliation - review of invoices and compare to past expense spreadsheets .60	\$950.00	0.6	\$570.00								
5/18/2020	David Marks	Teleconference with Attorney Thornton regarding status .3	\$950.00	0.3	\$285.00								
5/18/2020	Jim Thornton	Work with Diane Asher regarding exhibits to Dr. Cristina Flores dec .4	\$500.00	0.4	\$200.00								
5/18/2020	Jim Thornton	Review class cert brief .9	\$500.00	0.9	\$450.00								
5/18/2020	Jim Thornton	GoToMeetings w/David Marks regarding class cert brief and Flores section and damages paragraphs 2.2	\$500.00	2.2	\$1,100.00								
5/18/2020	Jim Thornton	Work on Flores section of brief 1.0	\$500.00	1	\$500.00								
5/18/2020	Jim Thornton	Work on Kennedy dec edits 1.2	\$500.00	1.2	\$600.00								
5/18/2020	Jim Thornton	Call with David Marks regarding status of decs and brief .3	\$500.00	0.3	\$150.00								
5/18/2020	Jim Thornton	Review of Schroyer's analysis of Sunrise task time distribution analysis 1.2	\$500.00	1.2	\$600.00								
5/19/2020	David Marks	Review attachments to Dr. Cristina Flores declaration regarding staffing, permutation and billing history 1.30	\$950.00	1.3	\$1,235.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
5/19/2020	David Marks	Review emails from CA Team regarding Dr. Flores declaration, review Dr. Flores underlying documents, and Rule 26 review [.4]	\$950.00	0.4		\$380.00								
5/19/2020	David Marks	Begin to gather all underlying materials relied upon by Dr. Flores, including authoritative literature [.2]	\$950.00	0.2		\$190.00								
5/19/2020	David Marks	GoToMeeting with Attorney Thornton to work on Dr. Flores summaries of voluminous documents [2.90]	\$950.00	2.9		\$2,755.00								
5/19/2020	David Marks	Teleconference with B. Peters regarding explanation of 6-month census [.10]	\$950.00	0.1		\$95.00								
5/19/2020	David Marks	Review emails regarding Oakmont/Aegis task times, and CA Team emails regarding Rule 26 not applicable to declaration [.30]	\$950.00	0.3		\$285.00								
5/19/2020	David Marks	Teleconference with Attorney Healey regarding status of Dr. Flores supporting summary documents [.20]	\$950.00	0.2		\$190.00								
5/19/2020	David Marks	Receipt and review multiple emails from Sunrise counsel, Attorney Joseph Gorman, regarding Plaintiff's failure to serve Mtn for Class Certification and supporting materials [.20]	\$950.00	0.2		\$190.00								
5/19/2020	David Marks	Teleconference with Attorney Thornton regarding Dr. Cristina Flores dec [.5]	\$950.00	0.5		\$475.00								
5/19/2020	Jim Thornton	Sent David Marks final signed Dr. Cristina Flores dec and supporting spreadsheets [.3]	\$500.00	0.3		\$150.00								
5/19/2020	Jim Thornton	GoToMeetings w/David Marks regarding supporting attachments [2.9]	\$500.00	2.9		\$1,450.00								
5/19/2020	Jim Thornton	Pulled Rule 26 and sent to David Marks [.1]	\$500.00	0.1		\$50.00								
5/19/2020	Jim Thornton	Email to Chris Healey regarding extraction project [.3]	\$500.00	0.3		\$150.00								
5/19/2020	Jim Thornton	Calls and texts with Blake Peters regarding confirmation of data pulls [1.3]	\$500.00	1.3		\$650.00								
5/19/2020	Jim Thornton	Calls with Dr. Cristina Flores regarding dec [.2]	\$500.00	0.2		\$100.00								
5/19/2020	Jim Thornton	Calls with David Marks regarding Dr. Cristina Flores dec [.5]	\$500.00	0.5		\$250.00								
5/20/2020	David Marks	Review of ADL task time literature in task time bibliography for relevant articles for Dr. Cristina Flores declaration [1.30]	\$950.00	1.3		\$1,235.00								
5/20/2020	David Marks	Teleconference with Attorney Thornton regarding ADL task time literature and Dr. Flores behavior buckets [.50]	\$950.00	0.5		\$475.00								
5/20/2020	David Marks	GoToMeeting with Attorney Thornton and Dr. Flores to discuss and update behavior buckets [.20]	\$950.00	0.2		\$190.00								
5/20/2020	David Marks	Compose response email to Attorney Healey regarding Dr. Flores task times and Gorman strategy [.30]	\$950.00	0.3		\$285.00								
5/20/2020	David Marks	Review of Dr. Flores task time literature regarding behavioral management [.50]	\$950.00	0.5		\$475.00								
5/20/2020	Jim Thornton	Call with David Marks regarding ADL task time literature and Dr. Flores behavior buckets [.5]	\$500.00	0.5		\$250.00								
5/20/2020	Jim Thornton	Brief GoToMeeting with David Marks and Dr. Flores to discuss and update behavior buckets [.2]	\$500.00	0.2		\$100.00								
5/21/2020	David Marks	Review communications responding to Gorman, review article regarding task times/behavioral task times review Attorney Thornton edit of task time list [.40]	\$950.00	0.4		\$380.00								
5/21/2020	David Marks	Teleconference with Attorney Thornton regarding production of task times in other cases [.20]	\$950.00	0.2		\$190.00								
5/21/2020	David Marks	Teleconference with Attorney Thornton to edit Joint Statement regarding remote depositions [2.0]	\$950.00	2		\$1,900.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
5/21/2020	David Marks	GoToMeeting with Attorney Thornton regarding counter points for Joint Brief regarding video depositions .80	\$950.00	0.8	\$760.00								
5/21/2020	David Marks	Continue review of Sowder behavioral article regarding task times .60	\$950.00	0.6	\$570.00								
5/21/2020	Jim Thornton	Call with David Marks regarding production of task times from other ALF chains obtained in other cases .2	\$500.00	0.2	\$100.00								
5/21/2020	Jim Thornton	Call with David Marks editing Joint Statement as to remote depositions 2.0	\$500.00	2	\$1,000.00								
5/21/2020	Jim Thornton	GoToMeeting with David Marks regarding counter points for Joint Brief regarding video depositions .8	\$500.00	0.8	\$400.00								
5/26/2020	David Marks	GoToMeeting with Attorney Thornton regarding review of supporting summaries and authoritative literature for Dr. Cristina Flores final draft declaration (in response to Sunrise request) 2.00	\$950.00	2	\$1,900.00								
5/26/2020	David Marks	Compose email to CA Team attaching same .20	\$950.00	0.2	\$190.00								
5/26/2020	David Marks	Review Dr. Flores declaration for other documents she relied upon .30	\$950.00	0.3	\$285.00								
5/26/2020	David Marks	Review of authoritative literature, task time bibliography and journal articles (in response to Sunrise request) to be produced for Dr. Flores declaration support, and review Attorney Marks declaration and supporting task time literature 1.70	\$950.00	1.7	\$1,615.00								
5/26/2020	David Marks	GoToMeeting with Attorney Thornton to edit task time bibliography to include only ADL task times and dementia 1.00	\$950.00	1	\$950.00								
5/26/2020	David Marks	GoToMeeting with B. Peters regarding updated Sunrise PPDs (in response to Sunrise's request) 1.10	\$950.00	1.1	\$1,045.00								
5/26/2020	David Marks	GoToMeeting with Attorney Thornton to continue edit of task time literature relied upon by Dr. Flores (in response to Sunrise discovery) 3.20	\$950.00	3.2	\$3,040.00								
5/26/2020	David Marks	Compose email to CA Team sending and explaining all supporting documents for Dr. Flores declaration for production to Sunrise (in response to Sunrise discovery) .3	\$950.00	0.3	\$285.00								
5/26/2020	David Marks	Review of final supporting documents for declaration and recheck references to Dr. Flores paragraphs .3	\$950.00	0.3	\$285.00								
5/26/2020	David Marks	Teleconference with Attorney Healey regarding ROGs 21 and 23 response .30	\$950.00	0.3	\$285.00								
5/26/2020	Jim Thornton	GoToMeeting w/David Marks regarding Flores dec and supporting materials 2.0	\$500.00	2	\$1,000.00								
5/26/2020	Jim Thornton	GoToMeetings with David Marks regarding task time literature supporting Flores dec 3.2	\$500.00	3.2	\$1,600.00								
5/26/2020	Jim Thornton	Emails with Dr. Cristina Flores regarding PubMed searches .3	\$500.00	0.3	\$150.00								
5/26/2020	Jim Thornton	GoToMeeting w/Blake Peters regarding summaries of voluminous records 1.1	\$500.00	1.1	\$550.00								
5/26/2020	Jim Thornton	Work on headings to summaries .4	\$500.00	0.4	\$200.00								
5/26/2020	Jim Thornton	Work on and pull supporting docs for Dr. Cristina Flores dec .8	\$500.00	0.8	\$400.00								
5/26/2020	Jim Thornton	Finalized email with all supporting docs to Dr. Cristina Flores dec and sent to David Marks .6	\$500.00	0.6	\$300.00								
5/26/2020	Jim Thornton	GoToMeeting with David Marks to edit task time bibliography to include only ADL task times and dementia 1.0	\$500.00	1	\$500.00								
5/27/2020	David Marks	Teleconference with Attorney Thornton regarding missing authoritative literature for Dr. Cristina Flores declaration support 1.0	\$950.00	1	\$950.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
5/27/2020	David Marks	Teleconference with Attorney Thornton regarding status of Sunrise projects and Dr. Flores access to final exhibits .10	\$950.00	0.1	\$95.00								
5/27/2020	David Marks	Compose email to Attorney Umpierre transmitting corrected #28 article for production to Defendants .20	\$950.00	0.2	\$190.00								
5/27/2020	David Marks	Respond to CA Team email regarding Rule 26 expert disclosure .20	\$950.00	0.2	\$190.00								
5/27/2020	David Marks	Edit ROGs 20 and 21 supplementing response .60	\$950.00	0.6	\$570.00								
5/27/2020	Jim Thornton	Emailed David Marks and Brian Umpierre correct article for Flores literature list .4	\$500.00	0.4	\$200.00								
5/27/2020	Jim Thornton	GoToMeeting with Dr. Cristina Flores regarding declaration and analyses 2.7	\$500.00	2.7	\$1,350.00								
5/27/2020	Jim Thornton	Call with Blake Peters regarding production .2	\$500.00	0.2	\$100.00								
5/27/2020	Jim Thornton	Call with David Marks regarding Dr. Cristina Flores dec and literature 1.0	\$500.00	1	\$500.00								
5/27/2020	Jim Thornton	Quick call with David Marks regarding status of Sunrise projects and Dr. Flores access to final exhibits .1	\$500.00	0.1	\$50.00								
5/28/2020	David Marks	Work on response to Sunrise discovery request, including challenges to Attorney Healey declaration, Dr. Cristina Flores declaration, and deposition scheduling 1.50	\$950.00	1.5	\$1,425.00								
5/28/2020	Jim Thornton	Consolidated and prepared time estimate for data extraction process and sent to Chris Healey, David Marks and TM 1.2	\$500.00	1.2	\$600.00								
5/28/2020	Jim Thornton	Emails regarding data extraction process and additional questions .4	\$500.00	0.4	\$200.00								
5/29/2020	David Marks	Compose email to Dr. Edward Jones and CA Team regarding database expert .30	\$950.00	0.3	\$285.00								
5/29/2020	David Marks	Review (a) Sunrise claims regarding inability to produce .csv of resident assessments and Plaintiffs' response, and (b) Dr. Cristina Flores' Sunrise combination for use by Dr. Kennedy for damages 1.1	\$950.00	1.1	\$1,045.00								
5/29/2020	David Marks	Compose email to Attorney Healey analysis tab rows 16-501 .2	\$950.00	0.2	\$190.00								
5/29/2020	David Marks	GoToMeeting with Attorney Thornton, Rich Feldman, Dr. Cristina Flores re: observational study 1.50	\$950.00	1.5	\$1,425.00								
5/29/2020	David Marks	Teleconference with Dr. Jones regarding his services and rates .50	\$950.00	0.5	\$475.00								
5/29/2020	David Marks	Teleconference with Dr. Flores regarding her deposition and prior trial testimony (last 4 years), and staffing policies and procedures .30	\$950.00	0.3	\$285.00								
5/29/2020	David Marks	GoToMeeting with Attorney Thornton regarding a calendar with a To Do list .60	\$950.00	0.6	\$570.00								
5/29/2020	David Marks	Compose email to CA Team regarding a proposed schedule of depositions .50	\$950.00	0.5	\$475.00								
5/29/2020	David Marks	Review, edit, and forward to CA Team documents supporting Dr. Flores declaration, and a list of her prior depositions and trials .80	\$950.00	0.8	\$760.00								
5/29/2020	Jim Thornton	Emails with David Marks regarding extraction process .6	\$500.00	0.6	\$300.00								
5/29/2020	Jim Thornton	GoToMeeting w/JS, Rich Feldman, Dr. Cristina Flores, David Marks regarding observational study 1.5	\$500.00	1.5	\$750.00								
5/29/2020	Jim Thornton	GoToMeeting w/David Marks regarding to do list .6	\$500.00	0.6	\$300.00								
5/29/2020	Jim Thornton	Call with Blake Peters regarding data issues .8	\$500.00	0.8	\$400.00								
5/29/2020	Jim Thornton	Call with Dr. Cristina Flores regarding dec and analysis .9	\$500.00	0.9	\$450.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
6/1/2020	David Marks	GoToMeeting with Attorney Thornton re: simulation authoritative literature and bibliography .80	\$950.00	0.8	\$760.00								
6/1/2020	David Marks	Review Dr. Cristina Flores invoice .10	\$950.00	0.1	\$95.00								
6/1/2020	David Marks	Compose email to Attorney Healey regarding expert invoices question .10	\$950.00	0.1	\$95.00								
6/1/2020	David Marks	Teleconference with Attorney Thornton to draft Motion to Compel for data extraction-San Mateo, and Dale Schroyer authoritative literature production .10	\$950.00	0.1	\$95.00								
6/1/2020	David Marks	Meeting with Clayton Cain regarding administrative issues - monies paid and owed to experts in Sunrise .10	\$950.00	0.1	\$95.00								
6/1/2020	David Marks	Teleconference with Attorney Thornton regarding Dale Schroyer authoritative literature .20	\$950.00	0.2	\$190.00								
6/1/2020	David Marks	Teleconference with Attorney Thornton regarding Dr. Flores billing .10	\$950.00	0.1	\$95.00								
6/1/2020	David Marks	Teleconference with Dr. Flores regarding billing .30	\$950.00	0.3	\$285.00								
6/1/2020	David Marks	Compose email to CA Team regarding status of Dr. Flores' invoices .20	\$950.00	0.2	\$190.00								
6/1/2020	David Marks	Teleconference with Attorney Healey regarding expert expenses (allocated costs), and B. Peters' declaration regarding underlying database .40	\$950.00	0.4	\$380.00								
6/1/2020	David Marks	Meeting with Clayton Cain regarding updating spreadsheet of expert costs .10	\$950.00	0.1	\$95.00								
6/1/2020	David Marks	GoToMeeting with Attorney Thornton regarding Motion to Compel .40	\$950.00	0.4	\$380.00								
6/1/2020	David Marks	Compose email to Attorney Healey regarding declaration in support of Motion to Compel .10	\$950.00	0.1	\$95.00								
6/1/2020	David Marks	Compose email to Attorney Healey regarding unpaid expert expenses .20	\$950.00	0.2	\$190.00								
6/1/2020	Diane Asher	Confer with Attorney Marks re: Dale Schroyer authoritative literature	\$85.00	0.3	\$25.50								
6/1/2020	Jim Thornton	Calls and GoToMeeting w/David Marks regarding simulation and task time bibliography .8	\$500.00	0.8	\$400.00								
6/1/2020	Jim Thornton	Updated listing of literature and sent David Marks DropBox link 1.3	\$500.00	1.3	\$650.00								
6/1/2020	Jim Thornton	Continue work on time estimates for data extraction and related emails 1.2	\$500.00	1.2	\$600.00								
6/1/2020	Jim Thornton	Pulled all extracted data .8	\$500.00	0.8	\$400.00								
6/1/2020	Jim Thornton	Began review of extracted data 1.2	\$500.00	1.2	\$600.00								
6/1/2020	Jim Thornton	Email to Chris Healey regarding extracted data .2	\$500.00	0.2	\$100.00								
6/1/2020	Jim Thornton	GoToMeeting w/David Marks and MTC .4	\$500.00	0.4	\$200.00								
6/1/2020	Jim Thornton	Call with David Marks regarding draft Motion to Compel for data extraction-San Mateo, and Dale Schroyer authoritative literature production .1	\$500.00	0.1	\$50.00								
6/1/2020	Jim Thornton	Call with David Marks regarding Dale Schroyer authoritative literature .2	\$500.00	0.2	\$100.00								
6/1/2020	Jim Thornton	Call with David Marks regarding Dr. Flores billing .1	\$500.00	0.1	\$50.00								
6/2/2020	David Marks	Review documents for B. Peters declaration in support of Motion to Compel .80	\$950.00	0.8	\$760.00								
6/2/2020	David Marks	Teleconference with Attorney Thornton regarding Motion to Compel , supporting declaration and supporting documents .60	\$950.00	0.6	\$570.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked		General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
6/2/2020	David Marks	Review Kennedy declaration and Dr. Cristina Flores permutation analysis [.90]	\$950.00	0.9	\$855.00								
6/2/2020	David Marks	Receipt and review email from Attorney Thornton regarding ideas for declaration [.20]	\$950.00	0.2	\$190.00								
6/2/2020	David Marks	Review Sunrise documents showing reports that can be created from assessment data, and review declaration of B. Peters regarding assessment database [2.50]	\$950.00	2.5	\$2,375.00								
6/2/2020	David Marks	Compose email to B. Peters and Attorney Thornton regarding draft declaration and list of items to be completed [.30]	\$950.00	0.3	\$285.00								
6/2/2020	David Marks	Review correspondence on various issues - ESI [.20]	\$950.00	0.2	\$190.00								
6/2/2020	Jim Thornton	Analysis of PCC website and search for Sunrise Connect Care info [1.2]	\$500.00	1.2	\$600.00								
6/2/2020	Jim Thornton	Sent PCC website info to David Marks [.3]	\$500.00	0.3	\$150.00								
6/2/2020	Jim Thornton	GoToMeeting w/Blake Peters regarding PCC website and Connect Care [1.0]	\$500.00	1	\$500.00								
6/2/2020	Jim Thornton	Emails with TM regarding sample assessment and review of same [.6]	\$500.00	0.6	\$300.00								
6/2/2020	Jim Thornton	Work on draft of Blake Peters declaration [1.3]	\$500.00	1.3	\$650.00								
6/2/2020	Jim Thornton	Sent additional PCC info to David Marks, Dale Schroyer, Blake Peters for comments [.3]	\$500.00	0.3	\$150.00								
6/2/2020	Jim Thornton	Work on data extraction project [1.4]	\$500.00	1.4	\$700.00								
6/2/2020	Jim Thornton	Calls with Blake Peters [.6]	\$500.00	0.6	\$300.00								
6/2/2020	Jim Thornton	Calls with David Marks regarding electronic medical record issues [.6]	\$500.00	0.6	\$300.00								
6/3/2020	David Marks	Teleconference with Attorney Thornton regarding B. Peters declaration section on database [.50]	\$950.00	0.5	\$475.00								
6/3/2020	David Marks	Teleconference with Attorney Healey regarding status report on budget for experts, Dr. Cristina Flores, and Sunrise data extraction [.20]	\$950.00	0.2	\$190.00								
6/3/2020	David Marks	GoToMeeting with Attorney Thornton to work on B. Peters declaration regarding database [.90]	\$950.00	0.9	\$855.00								
6/3/2020	David Marks	Teleconference with Attorney Thornton regarding Motion to Compel and regarding B. Peters declaration [1.70]	\$950.00	1.7	\$1,615.00								
6/3/2020	Jim Thornton	Emails with/Blake Peters regarding CareConnect and PCC [.5]	\$500.00	0.5	\$250.00								
6/3/2020	Jim Thornton	Calls and GoToMeetings w/David Marks regarding Blake Peters dec [1.7]	\$500.00	1.7	\$850.00								
6/3/2020	Jim Thornton	Sent draft to California team and Blake Peters for review and edits [.3]	\$500.00	0.3	\$150.00								
6/3/2020	Jim Thornton	Work on assessment data extraction and analysis [1.8]	\$500.00	1.8	\$900.00								
6/3/2020	Jim Thornton	Sent email with assessment data extraction and analysis to Chris Healey [.2]	\$500.00	0.2	\$100.00								
6/3/2020	Jim Thornton	Revised variable list and sent to team for extraction [1.7]	\$500.00	1.7	\$850.00								
6/3/2020	Jim Thornton	Sent revised variable list to David Marks [.1]	\$500.00	0.1	\$50.00								
6/3/2020	Jim Thornton	Calls with Blake Peters regarding revised variable list [.3]	\$500.00	0.3	\$150.00								
6/3/2020	Jim Thornton	Calls with David Marks regarding various projects and analyses [.5]	\$500.00	0.5	\$250.00								
6/3/2020	Jim Thornton	GoToMeeting with David Marks regarding Blake Peters declaration and database/summaries of records [.9]	\$500.00	0.9	\$450.00								
6/4/2020	David Marks	Review B. Peters declaration edits from CA Team and compare to original version [.40]	\$950.00	0.4	\$380.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked		General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
6/4/2020	David Marks	Review emails from CA Team regarding discovery of Sunrise electronic communications and Motion to Compel .90	\$950.00	0.9	\$855.00								
6/4/2020	David Marks	Teleconference with Attorney Thornton regarding B. Peters declaration .60	\$950.00	0.6	\$570.00								
6/4/2020	David Marks	Compose email to CA Team and B. Peters regarding execution of final declaration .20	\$950.00	0.2	\$190.00								
6/4/2020	David Marks	Teleconference with Attorney Thornton and Dale Schroyer regarding ProModel project updates .40	\$950.00	0.4	\$380.00								
6/4/2020	David Marks	Receipt and review email from Attorney Healey regarding changes to B. Peters declaration .10	\$950.00	0.1	\$95.00								
6/4/2020	David Marks	Teleconference with Attorney Healey regarding final changes to B. Peters declaration and execution of same .30	\$950.00	0.3	\$285.00								
6/4/2020	Jim Thornton	Review of edits to Blake Peters dec 2.9	\$500.00	2.9	\$1,450.00								
6/4/2020	Jim Thornton	Proofed and made final edits with David Marks 1.6	\$500.00	1.6	\$800.00								
6/4/2020	Jim Thornton	Emails regarding extraction .5	\$500.00	0.5	\$250.00								
6/4/2020	Jim Thornton	GoToMeeting w/Blake Peters regarding dec .4	\$500.00	0.4	\$200.00								
6/4/2020	Jim Thornton	Multiple emails relates to data extraction .4	\$500.00	0.4	\$200.00								
6/4/2020	Jim Thornton	Call with David Marks regarding Blake Peters declaration .6	\$500.00	0.6	\$300.00								
6/4/2020	Jim Thornton	Call with David Marks and Dale Schroyer regarding ProModel project updates .4	\$500.00	0.4	\$200.00								
6/5/2020	David Marks	Review correspondence regarding Oakmont Protective Order executed by data team .10	\$950.00	0.1	\$95.00								
6/5/2020	David Marks	Revise executed documents .10	\$950.00	0.1	\$95.00								
6/5/2020	David Marks	Revise declaration of B. Peters and have revised version executed .10	\$950.00	0.1	\$95.00								
6/5/2020	David Marks	Compose email to Dr. Cristina Flores cases and missing information .10	\$950.00	0.1	\$95.00								
6/5/2020	David Marks	Review billing for Dale Schroyer regarding declaration .10	\$950.00	0.1	\$95.00								
6/5/2020	David Marks	Update budget for remaining expert time projections for Sunrise certification issues .30	\$950.00	0.3	\$285.00								
6/5/2020	David Marks	Additional revisions to B. Peters in support of MTC Sunrise discovery .10	\$950.00	0.1	\$95.00								
6/5/2020	David Marks	Work on response to Gorman ROGs 20-21 .10	\$950.00	0.1	\$95.00								
6/5/2020	David Marks	Teleconference with Attorney Thornton regarding budget time for expert in Sunrise .30	\$950.00	0.3	\$285.00								
6/5/2020	David Marks	Review of compliance letter regarding confidentiality and issue raised by our association in the case mid-discovery .30	\$950.00	0.3	\$285.00								
6/5/2020	David Marks	Teleconference with Attorney Thornton and B. Peters regarding Mr. Peters' final declaration in support of MTC assessment data 2.10	\$950.00	2.1	\$1,995.00								
6/5/2020	David Marks	Review emails from CA Team regarding B. Peters declaration .20	\$950.00	0.2	\$190.00								
6/5/2020	David Marks	Teleconference with Dr. Flores regarding policy and procedures, and billing summary explanation for Dr. Flores and Dale Schroyer .40	\$950.00	0.4	\$380.00								
6/5/2020	David Marks	Review RFP #6, and add new RFP regarding formulas .40	\$950.00	0.4	\$380.00								
6/5/2020	Jim Thornton	Emails to extraction team regarding status .4	\$500.00	0.4	\$200.00								
6/5/2020	Jim Thornton	Email to David Marks regarding extraction short form .4	\$500.00	0.4	\$200.00								
6/5/2020	Jim Thornton	Resent confidentiality order .3	\$500.00	0.3	\$150.00								
6/5/2020	Jim Thornton	Work on extraction project and compilation .5	\$500.00	0.5	\$250.00								
6/5/2020	Jim Thornton	Calls with Blake Peters and David Marks regarding dec 2.1	\$500.00	2.1	\$1,050.00								

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
							<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	6/5/2020	Jim Thornton	Calls with Dale Schroyer regarding analyses [.3]	\$500.00	0.3	\$150.00								
	6/5/2020	Jim Thornton	Call with David Marks regarding budget time for expert in Sunrise [.3]	\$500.00	0.3	\$150.00								
	6/8/2020	Jim Thornton	Work on data extraction issues [.6]	\$500.00	0.6	\$300.00								
	6/8/2020	Jim Thornton	Received and reviewed data from extraction team [.3]	\$500.00	0.3	\$150.00								
	6/8/2020	Jim Thornton	Received and reviewed Yardi information from Dr. Cristina Flores [.4]	\$500.00	0.4	\$200.00								
	6/8/2020	Jim Thornton	Email to Chris Healey regarding update [.2]	\$500.00	0.2	\$100.00								
	6/9/2020	David Marks	Meeting with Diane Asher regarding Dr. Cristina Flores and Dale Schroyer allocated invoices and billing to be produced [.20]	\$950.00	0.2	\$190.00								
	6/9/2020	David Marks	Regarding discovery ROGs 20-21, review proposed emails regarding supplemental production of same, and reply to Defendant's complaints to Plaintiffs about the answers to ROGs 20-21 [.20]	\$950.00	0.2	\$190.00								
	6/9/2020	David Marks	Work with Diane Asher to capture Sunrise allocated invoices for Dr. Flores and Dale Schroyer [.40]	\$950.00	0.4	\$380.00								
	6/9/2020	Diane Asher	Work with Attorney Marks re: invoices for Dr. Flores and Dale Schroyer	\$85.00	0.4	\$34.00								
	6/9/2020	Jim Thornton	Request to restart extraction process [.3]	\$500.00	0.3	\$150.00								
	6/9/2020	Jim Thornton	Email to David Marks regarding extraction process [.2]	\$500.00	0.2	\$100.00								
	6/10/2020	David Marks	Teleconference with Attorney Thornton regarding data extraction project for San Mateo, and revise selection [.30]	\$950.00	0.3	\$285.00								
	6/10/2020	Jim Thornton	GoToMeeting w/Dr. Cristina Flores regarding permutations 1.0	\$500.00	1	\$500.00								
	6/10/2020	Jim Thornton	Call and work with David Marks and requested full extractions completed to date from team [.3]	\$500.00	0.3	\$150.00								
	6/11/2020	David Marks	Review Sunrise latest nastygram regarding discovery and draft responses [.20]	\$950.00	0.2	\$190.00								
	6/11/2020	David Marks	Review final RFP #6 regarding task time studies [.10]	\$950.00	0.1	\$95.00								
	6/11/2020	Jim Thornton	Emails with data extraction team members [.5]	\$500.00	0.5	\$250.00								
	6/12/2020	David Marks	Review and edit budget of expert costs for certification in 3 class actions 1.10	\$950.00	1.1	\$1,045.00								
	6/12/2020	Jim Thornton	Work with Diane Asher regarding pulling literature for Dr. Cristina Flores depo prep 1.8	\$500.00	1.8	\$900.00								
	6/14/2020	David Marks	Receipt and review email from Attorney Healey regarding certification budget for experts [.10]	\$950.00	0.1	\$95.00								
	6/15/2020	David Marks	Teleconference with Attorney Thornton regarding certification budget for experts [.7]	\$950.00	0.7	\$665.00								
	6/15/2020	David Marks	Respond to Attorney Healey question from 6.14.20 email regarding same [.2]	\$950.00	0.2	\$190.00								
	6/15/2020	David Marks	Teleconference with CA Team regarding coverage [.30]	\$950.00	0.3	\$285.00			0.3	285				
	6/15/2020	Jim Thornton	Call and work with David Marks regarding budget [.7]	\$500.00	0.7	\$350.00								
	6/16/2020	David Marks	Review proposed Sunrise depo schedule and respond to same [.30]	\$950.00	0.3	\$285.00								
	6/22/2020	Jim Thornton	Review of PointClickCare letter and d's declaration regarding database--responded to David Marks [.4]	\$500.00	0.4	\$200.00								
	6/23/2020	David Marks	GoToMeeting with Attorney Thornton and B. Peters regarding Sunrise discovery of .csv files 1.10	\$950.00	1.1	\$1,045.00								
	6/23/2020	Jim Thornton	GoToMeeting w/David Marks and Blake Peters regarding data extraction 1.1	\$500.00	1.1	\$550.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
6/23/2020	Jim Thornton	Prepared and sent numerous questions regarding Sunrise's position regarding database to David Marks for use in motion 1.4	\$500.00	1.4	\$700.00								
6/23/2020	Jim Thornton	Review of Discovery Stipulation and Declarations of Damian and Allyn in support of Stipulation .6	\$500.00	0.6	\$300.00								
6/23/2020	Jim Thornton	Call with David Marks and Blake Peters regarding discovery of .csv files .2	\$500.00	0.2	\$100.00								
6/24/2020	David Marks	Teleconference with Attorney C. Healey regarding depo schedule .10	\$950.00	0.1	\$95.00								
6/24/2020	Jim Thornton	Emails with assessment data extraction team members .3	\$500.00	0.3	\$150.00								
6/25/2020	David Marks	Review objections to Dr. Cristina Flores and Dale Schroyer subpoena for documents .30	\$950.00	0.3	\$285.00								
6/25/2020	David Marks	Teleconference with Attorney Thornton regarding response to Attorney Umpierre inquiry about "task time" referenced in Exhibit B of Dr. Flores declaration .50	\$950.00	0.5	\$475.00								
6/25/2020	Jim Thornton	Emails w/Tracy Myrick regarding extraction .3	\$500.00	0.3	\$150.00								
6/25/2020	Jim Thornton	Call with David Marks regarding response to Brian Umpierre question about task times referenced in Exhibit B of Dr. Flores dec .5	\$500.00	0.5	\$250.00								
6/29/2020	Jim Thornton	Emails with Rich Feldman and Dale Schroyer regarding QA of latest ALF model .3	\$500.00	0.3	\$150.00								
6/29/2020	Jim Thornton	Emails with Tracy Myrick regarding summary .2	\$500.00	0.2	\$100.00								
6/30/2020	Jim Thornton	Work on San Mateo extraction .4	\$500.00	0.4	\$200.00								
6/30/2020	Jim Thornton	Work on time projection for further analysis .4	\$500.00	0.4	\$200.00								
7/1/2020	David Marks	Teleconference with Attorney Thornton regarding 1 response to Attorney Umpierre's email regarding subpoena for Dr. Cristina Flores and Dale Schroyer, and 2 San Mateo data project 2-day timeline .90	\$950.00	0.9	\$855.00								
7/1/2020	David Marks	Teleconference with Attorney Thornton regarding San Mateo update as to analysis .10	\$950.00	0.1	\$95.00								
7/1/2020	Jim Thornton	Pulled and sent to David Marks expert info--literature regarding do not rush, Mosby's .7	\$500.00	0.7	\$350.00								
7/1/2020	Jim Thornton	Call with David Marks regarding response to Brian Umpierre's email regarding San Mateo data project and subpoena to Dr. Cristina Flores and Dale Schroyer .9	\$500.00	0.9	\$450.00								
7/1/2020	Jim Thornton	Call with David Marks regarding San Mateo analysis .1	\$500.00	0.1	\$50.00								
7/2/2020	David Marks	Teleconference with Attorney Thornton regarding San Mateo status and Dale Schroyer status for depo 1.90	\$950.00	1.9	\$1,805.00								
7/2/2020	David Marks	GoToMeeting with Attorney Thornton re: San Mateo data analysis .40	\$950.00	0.4	\$380.00								
7/2/2020	Jim Thornton	Texts and calls work with Dale Schroyer regarding database and Blake Peters dec .2	\$500.00	0.2	\$100.00								
7/2/2020	Jim Thornton	Sent updated facility data to David Marks .3	\$500.00	0.3	\$150.00								
7/2/2020	Jim Thornton	Call with David Marks 1.9	\$500.00	1.9	\$950.00								
7/2/2020	Jim Thornton	Work on ProModel confidentiality question .4	\$500.00	0.4	\$200.00								
7/2/2020	Jim Thornton	Work on San Mateo data analysis 1.2	\$500.00	1.2	\$600.00								
7/2/2020	Jim Thornton	GoToMeeting w/David Marks regarding San Mateo data analysis .4	\$500.00	0.4	\$200.00								
7/3/2020	Jim Thornton	Work on historical emails for production w/Dr. Cristina Flores .7	\$500.00	0.7	\$350.00								
7/6/2020	David Marks	Review Sunrise declaration and compose prep checklist 1.50	\$950.00	1.5	\$1,425.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
7/6/2020	David Marks	Teleconference with Attorney Thornton regarding status of San Mateo data .20	\$950.00	0.2		\$190.00								
7/6/2020	David Marks	For Dale Schroyer, review declaration and develop prep questions .80	\$950.00	0.8		\$760.00								
7/6/2020	David Marks	Work on Dale Schroyer depo prep outline 0.60	\$950.00	0.6		\$570.00								
7/6/2020	David Marks	Teleconference with Attorney Thornton and Dale Schroyer regarding Sunrise subpoena and prep regarding D. Schroyer declaration 1.80	\$950.00	1.8		\$1,710.00								
7/6/2020	David Marks	Work on depo prep of Dale Schroyer .5	\$950.00	0.5		\$475.00								
7/6/2020	David Marks	Compose email to CA Team regarding key points, and compose additional email to CA Team regarding correction of typo in Schroyer subpoena response and task time study .2	\$950.00	0.2		\$190.00								
7/6/2020	David Marks	GoToMeeting with Attorney Thornton and Dale Schroyer regarding depo prep 1.30	\$950.00	1.3		\$1,235.00								
7/6/2020	Jim Thornton	Work on updating permutation analysis with San Mateo data-- beyond ADL analysis in Dr. Cristina Flores dec 1.3	\$500.00	1.3		\$650.00								
7/6/2020	Jim Thornton	Began work on Flores/Schroyer depo prep (.8)	\$500.00	0.8		\$400.00								
7/6/2020	Jim Thornton	Calls with Blake Peters regarding San Mateo data analysis .2	\$500.00	0.2		\$100.00								
7/6/2020	Jim Thornton	Calls with David Marks regarding depo prep 1.0	\$500.00	1.0		\$500.00								
7/6/2020	Jim Thornton	Depo prep via GoToMeeting with David Marks and Dale Schroyer 1.3	\$500.00	1.3		\$650.00								
7/6/2020	Jim Thornton	calls with David Marks regarding status of San Mateo data analysis .2	\$500.00	0.2		\$100.00								
7/7/2020	David Marks	Review correspondence from CA Team to Sunrise regarding 2nd supplemental response to 2nd ROG 20-21 .30	\$950.00	0.3		\$285.00								
7/7/2020	David Marks	Work on D. Schroyer depo checklist and review Schroyer's (1) analysis of Sunrise time distribution, and (2) permutation analysis of ADL task timers applied to Sunrise's billing/point system 1.50	\$950.00	1.5		\$1,425.00								
7/7/2020	David Marks	Teleconference with Attorney Thornton regarding Dr. Cristina Flores depo prep, and review of San Mateo new analysis .80	\$950.00	0.8		\$760.00								
7/7/2020	David Marks	Teleconference with Attorney Thornton and Dale Schroyer regarding Schroyer depo prep 1.80	\$950.00	1.8		\$1,710.00								
7/7/2020	David Marks	Continued Schroyer depo prep and work on prep questions 1.0	\$950.00	1		\$950.00								
7/7/2020	Jim Thornton	Work on updated permutations analysis for San Mateo 2.0	\$500.00	2		\$1,000.00								
7/7/2020	Jim Thornton	Calls and work with Blake Peters and David Marks regarding San Mateo data analysis .8	\$500.00	0.8		\$400.00								
7/7/2020	Jim Thornton	Depo prep with Dale Schroyer and David Marks 2.5	\$500.00	2.5		\$1,250.00								
7/7/2020	Jim Thornton	Calls with David Marks and Dale Schroyer regarding depo prep 1.8	\$500.00	1.8		\$900.00								
7/8/2020	David Marks	Compose email to Attorney Umpierre regarding depo conference demonstration for Dale Schroyer .10	\$950.00	0.1		\$95.00								
7/8/2020	David Marks	GoToMeeting with Attorney Thornton and Schroyer regarding depo prep 2.20	\$950.00	2.2		\$2,090.00								
7/8/2020	David Marks	Compose email to Attorney Healey regarding Kennedy declaration .10	\$950.00	0.1		\$95.00								
7/8/2020	David Marks	Receipt and review and respond to emails to/from CA Team regarding Schroyer depo start time .20	\$950.00	0.2		\$190.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
7/8/2020	David Marks	Live demonstration and walk through (regarding upcoming Schroyer depo) of TSG remote deposition platform and exhibit use 1.20	\$950.00	1.2	\$1,140.00								
7/8/2020	David Marks	Teleconference to Attorney Healey regarding Kennedy declaration/depo prep .30	\$950.00	0.3	\$285.00								
7/8/2020	David Marks	Teleconference with Attorney C. Healey regarding Flores permutation analysis .20	\$950.00	0.2	\$190.00								
7/8/2020	Jim Thornton	Depo prep w/DM and Dale Schroyer via GoToMeeting 2.2	\$500.00	2.2	\$1,100.00								
7/8/2020	Jim Thornton	Attended demonstration of live litigation depo tech with David Marks 1.2	\$500.00	1.2	\$600.00								
7/8/2020	Jim Thornton	Work on downloading appropriate software for depo .3	\$500.00	0.3	\$150.00								
7/8/2020	Jim Thornton	Work with Blake Peters regarding staff time deductions under California law and Sunrise policies .6	\$500.00	0.6	\$300.00								
7/8/2020	Jim Thornton	Shared produced literature with Dale Schroyer .2	\$500.00	0.2	\$100.00								
7/9/2020	David Marks	Teleconference with Diane Asher regarding Dale Schroyer's cases with MBGY .20	\$950.00	0.2	\$190.00								
7/9/2020	David Marks	Complete depo prep notes for Schroyer depo (topics to cover in upcoming call) .70	\$950.00	0.7	\$665.00								
7/9/2020	David Marks	Teleconference with Attorney Thornton and Dr. Cristina Flores regarding validation study .40	\$950.00	0.4	\$380.00								
7/9/2020	David Marks	Teleconference with Attorney Thornton and Schroyer regarding depo prep 2.20	\$950.00	2.2	\$2,090.00								
7/9/2020	David Marks	Receipt and review of emails from CA Team and response to same regarding depo schedule and response to subpoenaed documents .30	\$950.00	0.3	\$285.00								
7/9/2020	David Marks	Teleconference with Attorney Healey regarding simulation demonstration .10	\$950.00	0.1	\$95.00								
7/9/2020	Diane Asher	Conference with Attorney Marks re: other cases with Dale Schroyer	\$85.00	0.2	\$17.00								
7/9/2020	Jim Thornton	Continued depo prep with Dale Schroyer and David Marks 3.9	\$500.00	3.9	\$1,950.00								
7/9/2020	Jim Thornton	Work on presentation slides and sent to David Marks 1.6	\$500.00	1.6	\$800.00								
7/9/2020	Jim Thornton	Sent self list of last minute items to prep Dale Schroyer on .3	\$500.00	0.3	\$150.00								
7/9/2020	Jim Thornton	Call with Dr. Cristina Flores regarding observational study--work on time capture using excel .5	\$500.00	0.5	\$250.00								
7/9/2020	Jim Thornton	Calls with David Marks and Dr. Cristina Flores regarding validation study .4	\$500.00	0.4	\$200.00								
7/9/2020	Jim Thornton	Calls with David Marks and Schroyer regarding depo prep 2.2	\$500.00	2.2	\$1,100.00								
7/10/2020	David Marks	Teleconference with Dale Schroyer regarding final depo prep .80	\$950.00	0.8	\$760.00								
7/10/2020	David Marks	GoToMeeting with Dale Schroyer and David Marks regarding depo 1.1	\$950.00	1.1	\$1,045.00								
7/10/2020	David Marks	Tender expert Dale Schroyer for depo 7.20	\$950.00	7.2	\$6,840.00	7.2	\$6,840.00						
7/10/2020	David Marks	Multiple teleconferences with Attorney Thornton 1.5	\$950.00	1.5	\$1,425.00								
7/10/2020	Jim Thornton	Pre-depo prep with Dale Schroyer .4	\$500.00	0.4	\$200.00								
7/10/2020	Jim Thornton	GoToMeeting with Dale Schroyer and David Marks regarding depo 1.1	\$500.00	1.1	\$550.00								
7/10/2020	Jim Thornton	Calls with David Marks 1.5	\$500.00	1.5	\$750.00								
7/10/2020	Jim Thornton	Attended Dale Schroyer deposition 6.7	\$500.00	6.7	\$3,350.00	6.7	\$3,350.00						
7/13/2020	David Marks	Telephone conference with CA Team regarding status of case .70	\$950.00	0.7	\$665.00			0.7	665				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
7/14/2020	Sterling Meachen	Downloaded and prepped Deposition Videos using their internal software for video clips and for deposition board slides	\$225.00	3.9		\$877.50								
7/14/2020	Jim Thornton	Work on auto entering time with seconds in spreadsheet to assist Dr. Flores .5	\$500.00	0.5		\$250.00								
7/14/2020	Jim Thornton	Sent detailed info to her .2	\$500.00	0.2		\$100.00								
7/15/2020	David Marks	Teleconference with Attorney Thornton regarding San Mateo data .20	\$950.00	0.2		\$190.00								
7/15/2020	David Marks	Teleconference with Attorney Healey regarding requirements to run simulation for San Mateo and change in date of call to discuss San Mateo data .30	\$950.00	0.3		\$285.00								
7/15/2020	Jim Thornton	Continue work with Dr. Cristina Flores regarding time study and capture 1.0	\$500.00	1		\$500.00								
7/15/2020	Jim Thornton	Pulled Dr. Cristina Flores historical emails for production .8	\$500.00	0.8		\$400.00								
7/15/2020	Jim Thornton	Continue work on San Mateo permutation analysis and sent to David Marks w/email explaining limitations of analysis 3.5	\$500.00	3.5		\$1,750.00								
7/15/2020	Jim Thornton	Call with David Marks regarding San Mateo data .2	\$500.00	0.2		\$100.00								
7/16/2020	David Marks	Review of discoverable information for Dr. Cristina Flores before deposition 1.30	\$950.00	1.3		\$1,235.00								
7/16/2020	Jim Thornton	W/on responses and objections to Flores request for documents in advance of her deposition with David Marks 1.5	\$500.00	1.5		\$750.00								
7/16/2020	Jim Thornton	Pulled documents regarding to RFP .6	\$500.00	0.6		\$300.00								
7/17/2020	David Marks	Teleconference with Dr. Cristina Flores regarding deposition prep schedule and Charlene Harrington article .20	\$950.00	0.2		\$190.00								
7/17/2020	David Marks	Teleconference with Attorney Thornton regarding Flores depo schedule, most recent San Mateo analysis, and review of the findings .70	\$950.00	0.7		\$665.00								
7/17/2020	Jim Thornton	Updated analysis based on San Mateo assessment data .3	\$500.00	0.3		\$150.00								
7/17/2020	Jim Thornton	Sent to David Marks .3	\$500.00	0.3		\$150.00								
7/17/2020	Jim Thornton	Depo prep with Dr. Cristina Flores 3.0	\$500.00	3		\$1,500.00								
7/17/2020	Jim Thornton	Call with David Marks regarding Flores depo schedule, most recent San Mateo analysis, and review of the findings .7	\$500.00	0.7		\$350.00								
7/19/2020	Jim Thornton	Work on prep schedule w/David Marks .2	\$500.00	0.2		\$100.00								
7/20/2020	David Marks	Review documents for Dr. Cristina Flores depo .20	\$950.00	0.2		\$190.00								
7/20/2020	David Marks	GoToMeeting with Attorney Thornton and Flores for depo prep 5.00	\$950.00	5		\$4,750.00								
7/20/2020	David Marks	Review Order from Judge Early regarding access to assessment data .10	\$950.00	0.1		\$95.00								
7/20/2020	David Marks	Teleconference with Attorneys Healey, Johnson, and Thornton regarding court-ordered meet and confer and B. Peters assessment analysis .50	\$950.00	0.5		\$475.00								
7/20/2020	Jim Thornton	Depo prep for Dr. Cristina Flores on GoToMeeting 5.0	\$500.00	5		\$2,500.00								
7/20/2020	Jim Thornton	Pulled exhibits .8	\$500.00	0.8		\$400.00								
7/20/2020	Jim Thornton	Received and reviewed order regarding .csv data .3	\$500.00	0.3		\$150.00								
7/20/2020	Jim Thornton	Work on questions for tomorrow 1.1	\$500.00	1.1		\$550.00								
7/20/2020	Jim Thornton	Calls with Blake Peters .4	\$500.00	0.4		\$200.00								
7/20/2020	Jim Thornton	Calls with conference call with ALF team .4	\$500.00	0.4		\$200.00								
7/20/2020	Jim Thornton	Calls with David Marks regarding prep .5	\$500.00	0.5		\$250.00								
7/21/2020	David Marks	GoToMeeting with Attorney Thornton and Dr. Cristina Flores to discuss declaration and voluminous supporting material 5.70	\$950.00	5.7		\$5,415.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
7/21/2020	David Marks	Teleconference with Attorney Thornton and B. Peters regarding (1) depo prep for Dr. Flores; (2) current deadlines and; (3) motion to compel question and time required to analyze assessment data 1.70	\$950.00	1.7	\$1,615.00								
7/21/2020	David Marks	Review Attorney Thornton question for Damian (Sunrise) - assessment database .20	\$950.00	0.2	\$190.00								
7/21/2020	Jim Thornton	Work on list of questions for Sunrise tech guy Marty Damian 1.2	\$500.00	1.2	\$600.00								
7/21/2020	Jim Thornton	Call w/Blake Peters regarding questions for Sunrise tech guy .3	\$500.00	0.3	\$150.00								
7/21/2020	Jim Thornton	Depo prep with Dr. Cristina Flores and David Marks and Blake Peters on GoToMeeting 5.7	\$500.00	5.7	\$2,850.00								
7/21/2020	Jim Thornton	Work on time projection on .csv versus .pdf issue .5	\$500.00	0.5	\$250.00								
7/21/2020	Jim Thornton	Call with David Marks and Blake Peters (1) depo prep for Dr. Flores; (2) current deadlines and; (3) motion to compel question and time required to analyze assessment data 1.70	\$500.00	1.7	\$850.00								
7/22/2020	Jacques Balette	Review Sunrise Corporate documents on Operating Budgets 2014 - 2020	\$750.00	3.8	\$2,850.00								
7/22/2020	David Marks	Review Dr. Cristina Flores declaration for key questions/depo areas 2.00	\$950.00	2	\$1,900.00								
7/22/2020	David Marks	GoToMeeting with Attorney Thornton and Flores for depo prep and review of key declaration points 6.90	\$950.00	6.9	\$6,555.00	6.9	\$6,555.00						
7/22/2020	David Marks	Teleconference with Attorney Thornton to work on response to Attorney Umpierre request regarding assessment data and service plan - service plan not needed/resident diagnosis is needed .10	\$950.00	0.1	\$95.00								
7/22/2020	Jim Thornton	Work on links from Dr. Cristina Flores dec to cited exhibits and references 1.2	\$500.00	1.2	\$600.00								
7/22/2020	Jim Thornton	GoToMeeting depo prep with Dr. Cristina Flores and David Marks 6.9	\$500.00	6.9	\$3,450.00	6.9	\$3,450.00						
7/22/2020	Jim Thornton	Listened to call with Sunrise tech guy .5	\$500.00	0.5	\$250.00								
7/22/2020	Jim Thornton	Follow-up call and multiple texts with Blake Peters .5	\$500.00	0.5	\$250.00								
7/22/2020	Jim Thornton	Call with David Marks regarding response to Brian Umpierre request for assessment data and service plan .1	\$500.00	0.1	\$50.00								
7/23/2020	David Marks	Compose list of questions for depo prep of Dr. Cristina Flores depo 2.00	\$950.00	2	\$1,900.00								
7/23/2020	David Marks	GoToMeeting depo prep with Dr. Flores and Attorney Thornton 8.30	\$950.00	8.3	\$7,885.00	8.3	\$7,885.00						
7/23/2020	Jim Thornton	Work on links from Dr. Cristina Flores dec to cited exhibits and references 2.3	\$500.00	2.3	\$1,150.00								
7/23/2020	Jim Thornton	GoToMeeting depo prep with Dr. Cristina Flores and David Marks 7.0	\$500.00	7	\$3,500.00	7	\$3,500.00						
7/23/2020	Jim Thornton	Call with Blake Peters .1	\$500.00	0.1	\$50.00								
7/24/2020	David Marks	Review Attorney Wallace's questions organize final prep notes and questions for call to Dr. Cristina Flores 1.80	\$950.00	1.8	\$1,710.00								
7/24/2020	David Marks	Teleconference with Attorneys Wallace and Healey regarding Flores depo prep and Attorney Wallace's questions .50	\$950.00	0.5	\$475.00								
7/24/2020	David Marks	Teleconference with Attorney Thornton and Dr. Cristina Flores regarding Attorney Wallace's questions .80	\$950.00	0.8	\$760.00								
7/24/2020	David Marks	Tender Dr. Flores for deposition 9.80	\$950.00	9.8	\$9,310.00	9.8	\$9,310.00						

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						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
7/24/2020	David Marks	Compose email and post-depo teleconference with Flores and Attorneys Healey, Wallace and Thornton regarding Flores depo .30	\$950.00	0.3	\$285.00								
7/24/2020	David Marks	Teleconference with Attorney Thornton regarding summary of Dr. Flores' direct and redirect testimony-key examination points/answers 1.1	\$950.00	1.1	\$1,045.00								
7/24/2020	Jim Thornton	Final prep call with Dr. Cristina Flores and David Marks 1.2	\$500.00	1.2	\$600.00								
7/24/2020	Jim Thornton	Calls with and GoToMeeting with Blake Peters regarding variable staff issue 1.4	\$500.00	1.4	\$700.00								
7/24/2020	Jim Thornton	Work on variable staff issue .8	\$500.00	0.8	\$400.00								
7/24/2020	Jim Thornton	Attended depo of Dr. Cristina Flores 9.8	\$500.00	9.8	\$4,900.00	9.8	\$4,900.00						
7/24/2020	Jim Thornton	Calls w/David Marks regarding depo, redirect and .pdf of spreadsheet 1.1	\$500.00	1.1	\$550.00								
7/25/2020	David Marks	Teleconference with Attorney Thornton re: Dr. Cristina Flores depo .30	\$950.00	0.3	\$285.00								
7/25/2020	Jim Thornton	Brief call from David Marks regarding Dr. Cristina Flores depo .3	\$500.00	0.3	\$150.00								
7/26/2020	Jacques Balette	Assist in the preparation of Cristina Flores deposition, organize documents, index materials, and prepare for cross-examination	\$750.00	3.1	\$2,325.00								
7/27/2020	Jacques Balette	Review email from Attorney Marks re: testimony of Cristina Flores, continuation of her deposition, documents used, review rough transcript etc.	\$750.00	1.3	\$975.00								
7/27/2020	David Marks	Teleconference with Attorney Thornton regarding Dale Schroyer transcript corrections, and question regarding Dr. Cristina Flores depo about the difference between how much time a resident requires and how much time a staff member provided .30	\$950.00	0.3	\$285.00								
7/27/2020	David Marks	Teleconference with Diane Asher regarding filing of Schroyer depo errata sheet .10	\$950.00	0.1	\$95.00								
7/27/2020	David Marks	Compose email to Dr. John Schnelle regarding scheduling a call to discuss task times for eating .10	\$950.00	0.1	\$95.00								
7/27/2020	David Marks	GoToMeeting with Attorney Thornton regarding additional key points from to Dr. Flores depo .9	\$950.00	0.9	\$855.00								
7/27/2020	Diane Asher	Confer with Attorney Marks re: Dale Schroyer errata	\$85.00	0.1	\$8.50								
7/27/2020	Jim Thornton	GoToMeeting w/David Marks-email to California team regarding Dr. Cristina Flores depo .9	\$500.00	0.9	\$450.00								
7/27/2020	Jim Thornton	Call with David Marks regarding Schroyer transcript corrections and issue from Flores depo about how much time a resident requires versus how much time a staff member provided .3	\$500.00	0.3	\$150.00								
7/28/2020	David Marks	Teleconference with Dr. John Schnelle and Attorney Thornton regarding Dr. Cristina Flores' eating task times .50	\$950.00	0.5	\$475.00								
7/28/2020	David Marks	GoToMeeting with Attorney Thornton re: task times and meal observation protocols - issue raised in Dr. Cristina Flores depo 0.60	\$950.00	0.6	\$570.00								
7/28/2020	Jim Thornton	GoToMeeting w/ David Marks, JS regarding task times and meal observation protocols--issue raised in Dr. Cristina Flores depo .6	\$500.00	0.6	\$300.00								
7/29/2020	David Marks	Review Attorney Healey's agenda for teleconference today .10	\$950.00	0.1	\$95.00								
7/29/2020	David Marks	Teleconference with Attorney Thornton regarding status of San Mateo project, and possibility of simulation .90	\$950.00	0.9	\$855.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
7/29/2020	David Marks	Teleconference with CA Team regarding problems with San Mateo data, Dr. Cristina Flores depo testimony, and To Do's 1.50	\$950.00	1.5	\$1,425.00			1.5	1425				
7/29/2020	David Marks	Teleconference with Attorney Thornton regarding Terrace Club staffing and Sunrise service plan .70	\$950.00	0.7	\$665.00								
7/29/2020	Jim Thornton	Calls with David Marks regarding San Mateo issues and Flores task times 1.6	\$500.00	1.6	\$800.00								
7/29/2020	Jim Thornton	Call with Blake Peters regarding San Mateo analysis .1	\$500.00	0.1	\$50.00								
7/29/2020	Jim Thornton	GoToMeeting with Blake Peters regarding issues with San Mateo data 1.9	\$500.00	1.9	\$950.00								
7/29/2020	Jim Thornton	Prepared and sent detailed memo to David Marks regarding San Mateo data 1.1	\$500.00	1.1	\$550.00								
7/29/2020	Jim Thornton	Work on combining all task times from all sources 1.0	\$500.00	1	\$500.00								
7/30/2020	David Marks	Teleconference with Attorney Thornton regarding ADL task times .40	\$950.00	0.4	\$380.00								
7/30/2020	Jim Thornton	Continue work on combining all task times from all sources 1.2	\$500.00	1.2	\$600.00								
7/30/2020	Jim Thornton	Calls with David Marks regarding task times .4	\$500.00	0.4	\$200.00								
7/31/2020	David Marks	Teleconference with Attorney Thornton regarding fields missing from Sunrise service plan .40	\$950.00	0.4	\$380.00								
7/31/2020	David Marks	Compose list of missing Sunrise data and email to CA Team .20	\$950.00	0.2	\$190.00								
7/31/2020	Jim Thornton	Call with David Marks regarding service plans .4	\$500.00	0.4	\$200.00								
7/31/2020	Jim Thornton	Pulled items from service plans not needed and sent to David Marks .6	\$500.00	0.6	\$300.00								
7/31/2020	Jim Thornton	Deep dive review of Laundry item issue and sent to team .9	\$500.00	0.9	\$450.00								
8/3/2020	Sterling Meachen	Graphically illustrated the Jean-Kayser Literature piece using Illustrator for use in presentation	\$225.00	5.5	\$1,237.50								
8/4/2020	Sterling Meachen	Isolated and built slides based upon Care Categories provided by medical records and from consulting with Marks	\$225.00	4.6	\$1,035.00								
8/4/2020	Jim Thornton	Work on .pdf creation of exhibits to Dr. Cristina Flores depo .3	\$500.00	0.3	\$150.00								
8/5/2020	David Marks	Teleconference with CA Team regarding San Mateo data, motion to compel, and Dr. Ed Jones permutation .80	\$950.00	0.8	\$760.00			0.8	760				
8/5/2020	David Marks	Receipt and review email from Attorney Healey regarding a statistician for permutation .20	\$950.00	0.2	\$190.00								
8/5/2020	David Marks	Teleconference with Attorney Thornton regarding San Mateo assessment (manual) and census discrepancy .40	\$950.00	0.4	\$380.00								
8/5/2020	David Marks	Compose email to Attorney Thornton and Dr. Ed Jones regarding San Mateo permutation .10	\$950.00	0.1	\$95.00								
8/5/2020	Sterling Meachen	Isolated and built slides based upon the difference between Required Vs. Actual Labor – highlighting examples	\$225.00	4.8	\$1,080.00								
8/5/2020	Jim Thornton	GoToMeeting w/ David Marks regarding Dr. Cristina Flores depo exhibit .4	\$500.00	0.4	\$200.00								
8/5/2020	Jim Thornton	Finalized exhibits and sent to CT reporter .6	\$500.00	0.6	\$300.00								
8/5/2020	Jim Thornton	Work on estimates and prepared detailed email to David Marks w/ time estimates for analysis .9	\$500.00	0.9	\$450.00								
8/6/2020	Sterling Meachen	Prepare a visual representation of the Labor Time available using real data and composed a slide once built	\$225.00	4.9	\$1,102.50								
8/6/2020	Jim Thornton	Emails to David Marks regarding Sunrise daily census .4	\$500.00	0.4	\$200.00								
8/6/2020	Jim Thornton	Texts and GoToMeeting w/Blake Peters regarding census comparisons .7	\$500.00	0.7	\$350.00								

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						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
8/6/2020	Jim Thornton	Work on data extraction based census issues and sent to Blake Peters 1.9	\$500.00	1.9	\$950.00								
8/7/2020	David Marks	Review Maryott correspondence regarding failure to produce documents for expert depositions .30	\$950.00	0.3	\$285.00								
8/7/2020	Jim Thornton	Call w/Dr. Cristina Flores regarding task time literature project .8	\$500.00	0.8	\$400.00								
8/7/2020	Jim Thornton	Emails with Blake Peters and David Marks regarding Blake Peters census analysis and explanation of issue .5	\$500.00	0.5	\$250.00								
8/10/2020	David Marks	Review and update billing funding spreadsheet after review of billing from Dr. Cristina Flores and Dale Schroyer .20	\$950.00	0.2	\$190.00								
8/10/2020	David Marks	Receipt and review email from Clayton Cain regarding current balance of payments to experts vs. new invoices from experts .20	\$950.00	0.2	\$190.00								
8/10/2020	David Marks	Teleconference with B. Peters regarding San Mateo preliminary review of analysis .30	\$950.00	0.3	\$285.00								
8/10/2020	David Marks	GoToMeeting with Attorney Thornton to create new spreadsheet of San Mateo data .80	\$950.00	0.8	\$760.00								
8/10/2020	David Marks	Teleconference with B. Peters regarding San Mateo preliminary review of analysis .30	\$950.00	0.3	\$285.00								
8/10/2020	David Marks	Teleconference with Attorney Thornton and B. Peters to discuss San Mateo analysis .20	\$950.00	0.2	\$190.00								
8/10/2020	Jim Thornton	Prepared detailed explanation of issues with San Mateo resident assessment and move-out data and sent to David marks and Blake Peters 1.2	\$500.00	1.2	\$600.00								
8/10/2020	Jim Thornton	GoToMeeting w/David Marks regarding San Mateo census issues and email .8	\$500.00	0.8	\$400.00								
8/10/2020	Jim Thornton	Work on obtaining access to produced .pdf assessments .8	\$500.00	0.8	\$400.00								
8/10/2020	Jim Thornton	Work on extraction spreadsheet and analysis of census 1.2	\$500.00	1.2	\$600.00								
8/10/2020	Jim Thornton	Telephone call with David Marks and Blake Peters to discuss San Mateo analysis .2	\$500.00	0.2	\$100.00								
8/10/2020	Jim Thornton	Emails with Diane Asher regarding errata sheets for Dr. Cristina Flores .2	\$500.00	0.2	\$100.00								
8/10/2020	Jim Thornton	Work with Blake Peters and Diane Asher regarding assessment data .6	\$500.00	0.6	\$300.00								
8/11/2020	David Marks	Review and respond to post depo subpoena 1.5	\$950.00	1.5	\$1,425.00								
8/11/2020	David Marks	Work with Diane Asher regarding depositions of Dale Schroyer and Dr. Cristina Flores and post depo subpoena .2	\$950.00	0.2	\$190.00								
8/11/2020	David Marks	Meeting with Clayton Cain regarding reconciliation of expert witness expenses .80	\$950.00	0.8	\$760.00								
8/11/2020	David Marks	Review San Mateo assessment .10	\$950.00	0.1	\$95.00								
8/11/2020	David Marks	GoToMeeting with Attorney Thornton to compose San Mateo assessment email for CA Team 1.00	\$950.00	1	\$950.00								
8/11/2020	David Marks	Compose email to CA Team regarding outstanding expert invoices and reconciliation of funding to date .70	\$950.00	0.7	\$665.00								
8/11/2020	David Marks	Review Attorney Maryott complaint regarding depositions, Flores depo transcript, Attorney Thornton response to Attorney Maryott complaints, Flores invoices 1.9	\$950.00	1.9	\$1,805.00								
8/11/2020	Diane Asher	Meeting with Attorney Marks re: depositions of Dr. Cristina Flores and Dale Schroyer	\$85.00	1.5	\$127.50								
8/11/2020	Sterling Meachen	Conferred with Attorney Marks regarding simple math graphic .3	\$225.00	0.3	\$67.50								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
8/11/2020	Sterling Meachen	Built a slide illustrating the simple math analysis used in determining staffing 4.1	\$225.00	4.1	\$922.50								
8/11/2020	Jim Thornton	Work on editing email regarding San Mateo assessments and census issues .9	\$500.00	0.9	\$450.00								
8/11/2020	Jim Thornton	GoToMeeting w/David Marks regarding San Mateo assessments and census issues 1.0	\$500.00	1	\$500.00								
8/11/2020	Jim Thornton	Received and reviewed post depo RFPs from Sunrise .4	\$500.00	0.4	\$200.00								
8/11/2020	Jim Thornton	Work on proposed responses to RFPs 2.9	\$500.00	2.9	\$1,450.00								
8/11/2020	Jim Thornton	Email proposed responses to RFPs to David Marks .1	\$500.00	0.1	\$50.00								
8/12/2020	David Marks	Prepare and email invoice to Attorney Healey for Denton's share of expert expenses .10	\$950.00	0.1	\$95.00								
8/12/2020	David Marks	Receipt and review email from Dr. John Schnelle comparing Dr. Cristina Flores task time to other data .20	\$950.00	0.2	\$190.00								
8/12/2020	David Marks	Review Flores transcript, Attorney Maryott complaint, and Flores' invoice and compose email to Attorney Wallace regarding same 1.2	\$950.00	1.2	\$1,140.00								
8/12/2020	Sterling Meachen	Prepared the beginning section of the Sunrise presentation 4.6	\$225.00	4.6	\$1,035.00								
8/12/2020	Sterling Meachen	Consulted with Marks for our first set of slides titled - Critical Question: Staff .4	\$225.00	0.4	\$90.00								
8/12/2020	Jim Thornton	Review task time literature from Dr. Cristina Flores and highlighted same .7	\$500.00	0.7	\$350.00								
8/12/2020	Jim Thornton	Work on task time spreadsheet 2.4	\$500.00	2.4	\$1,200.00								
8/12/2020	Jim Thornton	Work with David Marks regarding response to post depo RFPs .2	\$500.00	0.2	\$100.00								
8/13/2020	David Marks	Compose email to Dr. John Schnelle and teleconference with Schnelle to schedule a call regarding Dr. Cristina Flores emails .10	\$950.00	0.1	\$95.00								
8/13/2020	David Marks	Teleconference with Attorney Thornton regarding agendas for Schnelle and Flores .50	\$950.00	0.5	\$475.00								
8/13/2020	David Marks	Teleconference with Attorney Thornton regarding item by item response to Attorney Maryott's subpoena request 1.60	\$950.00	1.6	\$1,520.00								
8/13/2020	David Marks	Teleconference with Attorney Thornton and Schnelle regarding existence of many prior emails to Flores .10	\$950.00	0.1	\$95.00								
8/13/2020	David Marks	GoToMeeting with Attorney Thornton and Schnelle regarding accuracy of draft response to Attorney Maryott's subpoena request 3.90	\$950.00	3.9	\$3,705.00								
8/13/2020	David Marks	Teleconference with C. Healey regarding staffing analysis and Flores document production .10	\$950.00	0.1	\$95.00								
8/13/2020	Sterling Meachen	Illustrated Labor Time Consequences with Marks to be used in visual presentation	\$225.00	5.5	\$1,237.50								
8/13/2020	Jim Thornton	Multiple calls and GoToMeetings with David Marks regarding RFPs post deposition 6.1	\$500.00	6.1	\$3,050.00	6.1	\$3,050.00						
8/13/2020	Jim Thornton	GoToMeeting w/Dr. Cristina Flores regarding document review .8	\$500.00	0.8	\$400.00								
8/13/2020	Jim Thornton	Work on pulling depo quotes in support .5	\$500.00	0.5	\$250.00								
8/14/2020	David Marks	Teleconference with Attorney Thornton regarding Flores depo .10	\$950.00	0.1	\$95.00								
8/14/2020	David Marks	Review depo in a different case (Reliance) to check for Dr. John Schnelle averages .80	\$950.00	0.8	\$760.00								

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						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
8/14/2020	David Marks	Teleconference with Attorney Thornton regarding Flores section of Attorney Maryott response 1.50	\$950.00	1.5	\$1,425.00								
8/14/2020	David Marks	Teleconference with Attorney Thornton regarding requests in subpoena 2.50	\$950.00	2.5	\$2,375.00								
8/14/2020	Jim Thornton	GoToMeeting with Blake Peters regarding QA of data extraction for San Mateo .8	\$500.00	0.8	\$400.00								
8/14/2020	Jim Thornton	Multiple calls and GoToMeetings w/David Marks regarding post depo RFP responses 4.1	\$500.00	4.1	\$2,050.00								
8/14/2020	Jim Thornton	Received and reviewed list of Schroyer cases with MBGY .3	\$500.00	0.3	\$150.00								
8/14/2020	Jim Thornton	Received and reviewed meet and confer info from Brian Umpierre .3	\$500.00	0.3	\$150.00								
8/14/2020	Jim Thornton	Emails with Brian Umpierre regarding documents sent to Maryott and video embedded in PowerPoint .3	\$500.00	0.3	\$150.00								
8/14/2020	Jim Thornton	Tested playability of PPT video .2	\$500.00	0.2	\$100.00								
8/18/2020	Sterling Meachen	Revised ProModel Simulation Slides in order to fit Sunrise name and values	\$225.00	4.4	\$990.00								
8/19/2020	Sterling Meachen	Created presentation section outlining how Conservative our Analysis is.	\$225.00	4.7	\$1,057.50								
8/20/2020	David Marks	Receipt and review from Attorney Umpierre the Kennedy portion of Attorney Maryott response .10	\$950.00	0.1	\$95.00								
8/20/2020	David Marks	Compose email to Attorney Umpierre regarding need for bates stamps on response, and review of attachments to response .20	\$950.00	0.2	\$190.00								
8/20/2020	David Marks	Review material from Dr. Cristina Flores depo and organize into a binder for future use .20	\$950.00	0.2	\$190.00								
8/20/2020	David Marks	Compose email to Attorney Umpierre regarding privilege log .10	\$950.00	0.1	\$95.00								
8/20/2020	David Marks	Edit correspondence to Attorney Maryott to include bates stamps .10	\$950.00	0.1	\$95.00								
8/20/2020	David Marks	Review email from Attorney Umpierre regarding privilege log .10	\$950.00	0.1	\$95.00								
8/20/2020	Sterling Meachen	Created key cards that describe who are our Simulation Experts with their accomplishments	\$225.00	4.6	\$1,035.00								
8/26/2020	Sterling Meachen	Using excel spreadsheets and other findings created slides illustrating Task Times	\$225.00	4.1	\$922.50								
8/27/2020	Sterling Meachen	Conferred with Attorney Marks to build an explanation for the Analytic Technology used in the simulation and other findings	\$225.00	3.8	\$855.00								
8/28/2020	Sterling Meachen	Used findings to help illustrate the concept of Maximum Work Capacity for presentation use	\$225.00	5	\$1,125.00								
8/28/2020	Jim Thornton	Emails and GoToMeeting with Blake Peters regarding sample assessment data .6	\$500.00	0.6	\$300.00								
8/28/2020	Jim Thornton	Review of sample assessment data .2	\$500.00	0.2	\$100.00								
8/30/2020	Jim Thornton	Create list of issues in sample data .7	\$500.00	0.7	\$350.00								
8/30/2020	Jim Thornton	Email to David Marks regarding issues seen in the sample La Jolla assessment data produced .5	\$500.00	0.5	\$250.00								
8/30/2020	Jim Thornton	Downloaded all produced .pdf assessments .6	\$500.00	0.6	\$300.00								
8/31/2020	David Marks	Review Ashley Allen emails regarding production 0.10	\$950.00	0.1	\$95.00								
8/31/2020	David Marks	Review Attorney Thornton proposed draft of same .20	\$950.00	0.2	\$190.00								
8/31/2020	David Marks	Edit draft email from Attorney Thornton .10	\$950.00	0.1	\$95.00								
8/31/2020	David Marks	Compose email to CA Team regarding same .10	\$950.00	0.1	\$95.00								
8/31/2020	David Marks	Review sample assessment files with Attorney Thornton .40	\$950.00	0.4	\$380.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
8/31/2020	David Marks	GoToMeeting and teleconference with Attorney Thornton regarding assessment file issues 1.60	\$950.00	1.6	\$1,520.00								
8/31/2020	Jim Thornton	Calls with David Marks and GoToMeeting regarding sample assessment issues 1.6	\$500.00	1.6	\$800.00								
8/31/2020	Jim Thornton	Brief call with Blake Peters regarding sample .1	\$500.00	0.1	\$50.00								
8/31/2020	Jim Thornton	Work on email regarding La Jolla sample data and issues related to same .5	\$500.00	0.5	\$250.00								
8/31/2020	Jim Thornton	Emails regarding SEHA issues .2	\$500.00	0.2	\$100.00								
9/1/2020	Sterling Meachen	Industrial engineering delivery of service re-edits and prepared for presentation	\$225.00	3.3	\$742.50								
9/1/2020	Jim Thornton	Review of email regarding sample assessments and emailed David Marks regarding same .3	\$500.00	0.3	\$150.00								
9/2/2020	David Marks	Teleconference with Attorney Thornton regarding Attorney Johnson email to A. Allen regarding resident assessments produced by Defendants .10	\$950.00	0.1	\$95.00								
9/2/2020	Sterling Meachen	Created a variety of slide dictating success stories from ProModel such as Emory Healthcare	\$225.00	4.6	\$1,035.00								
9/2/2020	Jim Thornton	Telephone call with David Marks regarding Attorney Johnson email to A. Allen regarding resident assessment produced by Defendants .1	\$500.00	0.1	\$50.00								
9/3/2020	Jacques Balette	Review documents filed under seal	\$750.00	0.7	\$525.00								
9/3/2020	Sterling Meachen	Used excel and illustrator to being graphing and visualizing the threshold % of required service for nursing homes	\$225.00	5.9	\$1,327.50								
9/4/2020	David Marks	Preliminary review of Sunrise Motion to Strike Flores Declaration .40	\$950.00	0.4	\$380.00								
9/4/2020	David Marks	GoToMeeting with Attorney Thornton regarding MTS Dr. Flores declaration .80	\$950.00	0.8	\$760.00								
9/4/2020	Sterling Meachen	Using data given by data analyst, created slide set outlining prevalence analysis of data	\$225.00	4.3	\$967.50								
9/4/2020	Jim Thornton	Review of Ward declaration and sent David Marks notes regarding same 1.2	\$500.00	1.2	\$600.00								
9/4/2020	Jim Thornton	GoToMeeting with David Marks regarding MTS Flores .8	\$500.00	0.8	\$400.00								
9/7/2020	Sterling Meachen	Re-edits to Success Stories to include those more direct and near Washington state such as Irion and the Olympics in Salt Lake	\$225.00	4.6	\$1,035.00								
9/9/2020	Jim Thornton	Review of email from defense about database pull .1	\$500.00	0.1	\$50.00								
9/9/2020	Jim Thornton	Confirmed satisfactory proposal to David Marks .2	\$500.00	0.2	\$100.00								
9/10/2020	Sterling Meachen	Using data given by analyst, prepared a set of graphs showing the Frequency Daily/Weekly of key ADLs	\$225.00	5.8	\$1,305.00								
9/11/2020	David Marks	Teleconference with Attorney Healey regarding Flores analysis .20	\$950.00	0.2	\$190.00								
9/11/2020	Sterling Meachen	Revised presentation to include corrected section titles and new quotes	\$225.00	5.8	\$1,305.00								
9/11/2020	Jim Thornton	Received and reviewed arbitration pleadings and emails regarding database request .6	\$500.00	0.6	\$300.00								
9/15/2020	Jim Thornton	Review of additional SUN000xx spreadsheets pertinent to staffing analysis .4	\$500.00	0.4	\$200.00								
9/16/2020	David Marks	Teleconference with CA Team regarding status report on case .90	\$950.00	0.9	\$855.00			0.9	855				
9/17/2020	David Marks	Teleconference with B. Peters regarding analysis of new staffing data produced by Defendants .20	\$950.00	0.2	\$190.00								

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						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
9/22/2020	David Marks	Teleconference with Attorney Thornton about the status of simulation, and contacting Dr. Richard Feldman regarding bundling rule for simulation .20	\$950.00	0.2	\$190.00								
9/22/2020	David Marks	Teleconference with Kurt Shampine regarding simulation .20	\$950.00	0.2	\$190.00								
9/22/2020	Jim Thornton	Call with David Marks about sim runs and status, requested to contact Dr. Richard Feldman regarding bundling rules .2	\$500.00	0.2	\$100.00								
9/23/2020	David Marks	Telephone call with Attorney Thornton regarding attack on Flores in Defendant's declaration of Robert Crandall .90	\$950.00	0.9	\$855.00								
9/23/2020	David Marks	Teleconference with CA Team regarding Crandall declaration and depositions .60	\$950.00	0.6	\$570.00			0.6	570				
9/23/2020	David Marks	Teleconference with Attorney Healey regarding Flores strike and related issues .70	\$950.00	0.7	\$665.00								
9/23/2020	David Marks	Receipt and review email from Attorney Thamer regarding expert witnesses .10	\$950.00	0.1	\$95.00								
9/23/2020	Jim Thornton	Call with David Marks regarding Crandall's attacks on Flores .9	\$500.00	0.9	\$450.00								
9/24/2020	David Marks	Teleconference with Attorney Thornton and B. Peters regarding status of Sunrise staffing, discuss staffing analysis with original staffing data vs. new staffing data produced by Defendants 1.60	\$950.00	1.6	\$1,520.00								
9/24/2020	David Marks	Compose email to CA Team regarding staffing analysis .40	\$950.00	0.4	\$380.00								
9/24/2020	David Marks	Receipt and review email from Attorney Thornton regarding staffing analysis .10	\$950.00	0.1	\$95.00								
9/24/2020	David Marks	Teleconference with Attorney Thornton regarding same and regarding data analysis of staffing prepared by B. Peters .50	\$950.00	0.5	\$475.00								
9/24/2020	Jim Thornton	Work on staffing breakdown analysis 1.7	\$500.00	1.7	\$850.00								
9/24/2020	Jim Thornton	Call with David Marks and Blake Peters regarding Sunrise staffing analysis and new staffing data produced by Defendants 1.6	\$500.00	1.6	\$800.00								
9/24/2020	Jim Thornton	Call with David Marks regarding analysis of staffing .5	\$500.00	0.5	\$250.00								
9/25/2020	David Marks	Teleconference with Attorney Thornton regarding expert witness regarding task time literature .20	\$950.00	0.2	\$190.00								
9/25/2020	David Marks	Meeting with Diane Asher regarding Sunrise time logs .30	\$950.00	0.3	\$285.00								
9/25/2020	David Marks	Teleconference with Attorney Thornton, Kurt Shampine, Dave Tucker, and Bruce Neumann regarding analyzing assessment data/time frame .90	\$950.00	0.9	\$855.00								
9/25/2020	Diane Asher	Meeting with Attorney Marks re: time logs for Sunrise	\$85.00	0.3	\$25.50								
9/25/2020	Jim Thornton	Call with David Marks regarding task time literature .2	\$500.00	0.2	\$100.00								
9/25/2020	Jim Thornton	Call with David Marks, Kurt Shampine, Dave Tucker, and Bruce Neumann regarding assessment data and data available during time frame .9	\$500.00	0.9	\$450.00								
9/26/2020	David Marks	Teleconference with Attorney Thamer regarding Dr. Cristina Flores background/history .50	\$950.00	0.5	\$475.00								
9/28/2020	David Marks	Review correspondence regarding depo schedules, staffing status, and review calendar for depo dates .30	\$950.00	0.3	\$285.00								
9/28/2020	David Marks	Compose email to CA Team regarding 1 depo dates for Sunrise experts (Crandall and Ward) and work needed for these depositions, and staffing analysis update call .20	\$950.00	0.2	\$190.00								
9/28/2020	David Marks	Teleconference with Attorney Thornton regarding MDS data for workload .60	\$950.00	0.6	\$570.00								
9/28/2020	David Marks	Teleconference with Attorney Thornton to discuss ADL task time studies analysis from authoritative literature .20	\$950.00	0.2	\$190.00								

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
							<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	9/28/2020	David Marks	Teleconference with Attorney Thornton regarding ADL task time collection and analysis of authoritative literature 1.0	\$950.00	1	\$950.00								
	9/28/2020	David Marks	Review Crandall declaration/prep for depo .90	\$950.00	0.9	\$855.00								
	9/28/2020	David Marks	Continue review of Crandall declaration and the attachments 1.1	\$950.00	1.1	\$1,045.00								
	9/28/2020	David Marks	Compose draft cross-examination for Crandall 1.5	\$950.00	1.5	\$1,425.00								
	9/28/2020	David Marks	Teleconference with Attorney Thornton regarding ADL task time studies per authoritative literature .10	\$950.00	0.1	\$95.00								
	9/28/2020	David Marks	Teleconference with B. Peters regarding staffing analysis per Sunrise facility based on month .20	\$950.00	0.2	\$190.00								
	9/28/2020	David Marks	Teleconference with Attorney Healey regarding depo schedule, assessment data status, simulation analysis, B. Peters Target v. Actual spreadsheet, good cause for moving reply date, Attorney Johnson's response to service care plan, and staffing analysis of 9.24.20 1.20	\$950.00	1.2	\$1,140.00								
	9/28/2020	David Marks	Teleconference with Attorney Thornton to discuss examples of service care plan and possible stipulation .20	\$950.00	0.2	\$190.00								
	9/28/2020	David Marks	Compose email to CA Team regarding stipulation on service care plan .10	\$950.00	0.1	\$95.00								
	9/28/2020	Diane Asher	Assist in drafting cross-examination for Crandall	\$85.00	2.6	\$221.00								
	9/28/2020	Jim Thornton	Call with David Marks regarding MDS data for workload .6	\$500.00	0.6	\$300.00								
	9/28/2020	Jim Thornton	Calls with David Marks regarding ADL task time collection and analysis of authoritative literature 1.1	\$500.00	1.3	\$650.00								
	9/28/2020	Jim Thornton	Call with David Marks regarding service plans and possible stipulation .2	\$500.00	0.2	\$100.00								
	9/29/2020	Jacques Balette	Meeting with Attorney Marks re: expert Crandall deposition, exhibits to his designation, and research needed	\$750.00	0.2	\$150.00								
	9/29/2020	David Marks	Review exhibits to Crandall declaration in preparation for Crandall depo .70	\$950.00	0.7	\$665.00								
	9/29/2020	David Marks	Meeting with Attorney Balette regarding prep for Crandall depo .20	\$950.00	0.2	\$190.00								
	9/29/2020	David Marks	Meeting with Diane Asher regarding tasks to prepare for Crandall depo - gathering Crandall declarations in other cases, provide Dr. Cristina Flores CDC Study, locate authors of CDC study referenced by Crandall, and determine reason for Crandall's partial study .30	\$950.00	0.3	\$285.00								
	9/29/2020	David Marks	Review B. Peters' updated staffing analysis based on 3 different sources of staffing data .20	\$950.00	0.2	\$190.00								
	9/29/2020	David Marks	Teleconference with B. Peters for explanation of spreadsheet containing staffing analysis by source .10	\$950.00	0.1	\$95.00								
	9/29/2020	David Marks	Review Cotter journal article attached to Crandall declaration .80	\$950.00	0.8	\$760.00								
	9/29/2020	David Marks	Compose email to Dr. John Schnelle enclosing Cotter article relied upon by Crandall .10	\$950.00	0.1	\$95.00								
	9/29/2020	David Marks	GoToMeeting with Attorney Thornton to review ADL task time studies from literature, Daubert challenge based on Flores' task times, determine if Flores task times are reasonable, and Dr. Simmons research on feeding time 2.60	\$950.00	2.6	\$2,470.00								
	9/29/2020	David Marks	Teleconference with Attorney Thornton to discuss the majority of missing pages to the CDC 2016 study relied upon by Crandall .10	\$950.00	0.1	\$95.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
9/29/2020	David Marks	Review background checks (by Dianne Fleming) and publicly available information on Crandall .40	\$950.00	0.4	\$380.00								
9/29/2020	David Marks	Review of entire CDC study referenced and relied upon by Crandall in his declaration 1.0	\$950.00	1	\$950.00								
9/29/2020	David Marks	Teleconference with Attorney Thornton regarding Attorney Johnson's questions about service care plan differences from assessment data .4	\$950.00	0.4	\$380.00								
9/29/2020	David Marks	Teleconference with Attorney Thornton regarding additional correspondence to Attorney Johnson regarding service care plan .20	\$950.00	0.2	\$190.00								
9/29/2020	David Marks	Compose draft cross-examination questions and strategy 1.50	\$950.00	1.5	\$1,425.00								
9/29/2020	Diane Asher	Meet with Attorney Marks re: Crandall deposition	\$85.00	0.3	\$25.50								
9/29/2020	Jim Thornton	GoToMeeting w/David Marks regarding task times and Crandall depo prep 2.6	\$500.00	2.6	\$1,300.00								
9/29/2020	Jim Thornton	Review of multiple service plans/assessments 2.1	\$500.00	2.1	\$1,050.00								
9/29/2020	Jim Thornton	Prepared detailed email regarding workload aspects of same for purposes of Motion to Compel service plans .4	\$500.00	0.4	\$200.00								
9/29/2020	Jim Thornton	GoToMeeting with David Marks regarding service plans .4	\$500.00	0.4	\$200.00								
9/29/2020	Jim Thornton	Call with David Marks regarding missing pages to the CDC 2016 study relied upon by Crandall .1	\$500.00	0.1	\$50.00								
9/29/2020	Jim Thornton	Call with David Marks regarding additional correspondence to Mark Johnson regarding service plans .2	\$500.00	0.2	\$100.00								
9/30/2020	Jacques Balette	Confer with team re: deposition topics, cross-examination, impeachment, read prior Crandall depositions, summarize depositions, review documents attached to Crandall designation 6.8	\$750.00	6.8	\$5,100.00	6.8	\$5,100.00	6.8	5100				
9/30/2020	David Marks	Compose email to Attorney Healey requesting briefing regarding confidentiality, and regarding Motion to Strike Flores declaration .30	\$950.00	0.3	\$285.00								
9/30/2020	David Marks	Teleconference with B. Peters regarding comparison of Sunrise staffing 3 sources) to Aegis staffing .10	\$950.00	0.1	\$95.00								
9/30/2020	David Marks	Review staffing analysis comparing Sunrise facilities to Aegis facilities .30	\$950.00	0.3	\$285.00								
9/30/2020	David Marks	Review Attorney Healey's Plaintiffs' Opposition to Sunrise's Motion to Strike Dr. Flores' declaration .70	\$950.00	0.7	\$665.00								
9/30/2020	David Marks	Meeting with Attorney Balette regarding depo questions/topics for Crandall depo 6.80	\$950.00	6.8	\$6,460.00	6.8	\$6,460.00						
9/30/2020	David Marks	Research regarding Watermark relationship to Sunrise and compose email to CA Team regarding same 1.1	\$950.00	1.1	\$1,045.00								
9/30/2020	Jim Thornton	Texts and call with Blake Peters regarding target hours calculations based on billing history versus hours available analysis .7	\$500.00	0.7	\$350.00								
9/30/2020	Jim Thornton	Received and reviewed staffing comparison from Blake Peters .3	\$500.00	0.3	\$150.00								
9/30/2020	Jim Thornton	Review of MTS Flores .4	\$500.00	0.4	\$200.00								
9/30/2020	Jim Thornton	Work on CDC issue and "benchmarks" 2.6	\$500.00	2.6	\$1,300.00								
9/30/2020	Jim Thornton	Work on Dr. Cristina Flores task time support for permutations 1.4	\$500.00	1.4	\$700.00								
9/30/2020	Jim Thornton	Revamped permutations spreadsheets with revised numbers 3.6	\$500.00	3.6	\$1,800.00								
9/30/2020	Jim Thornton	Review of draft opposition to MTS Flores .4	\$500.00	0.4	\$200.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
9/30/2020	Jim Thornton	Received and reviewed emails regarding Watermark management of Sunrise facilities .3	\$500.00	0.3	\$150.00								
9/30/2020	Jim Thornton	Received and reviewed emails regarding Crandall's attacks on analysis .4	\$500.00	0.4	\$200.00								
10/1/2020	Jacques Balette	Review expert materials forwarded by email from Attorney Umpierre	\$750.00	2.2	\$1,650.00								
10/1/2020	David Marks	Develop question for Crandall depo based on review of Crandall declaration/attachments 2.00	\$950.00	2	\$1,900.00								
10/1/2020	David Marks	Teleconference with Attorney Thornton regarding Crandall depo prep - rerunning permutations, reviewing Crandall's attack on the number of possible ADL combinations, and questions on Ward's statistical analysis 1.10	\$950.00	1.1	\$1,045.00								
10/1/2020	David Marks	Meeting with B. Peters regarding Ward analysis of Target Hrs vs. Actual Hrs .80	\$950.00	0.8	\$760.00								
10/1/2020	David Marks	Teleconference with Attorney Thornton and B. Peters regarding missing spreadsheets and data tables .30	\$950.00	0.3	\$285.00								
10/1/2020	David Marks	Work on request for any documents from Sunrise containing budget pressure to hit financial targets .20	\$950.00	0.2	\$190.00								
10/1/2020	David Marks	Teleconference with Sol Solomon regarding economics resolution .30	\$950.00	0.3	\$285.00								
10/1/2020	David Marks	Teleconference with Milton Frankfort regarding economics resolution .50	\$950.00	0.5	\$475.00								
10/1/2020	David Marks	Teleconference with Bryne Liner regarding economics resolution .40	\$950.00	0.4	\$380.00								
10/1/2020	David Marks	GoToMeeting with Attorney Thornton regarding review of revised permutation analysis 1.1	\$950.00	1.1	\$1,045.00								
10/1/2020	David Marks	Review depo subpoena request for Crandall documents .10	\$950.00	0.1	\$95.00								
10/1/2020	David Marks	Compose email to Attorney Healey regarding pulling all cases filed against Watermark and all Plaintiffs' law firms in CA from 2010 to present .40	\$950.00	0.4	\$380.00								
10/1/2020	David Marks	Receipt and review email regarding Sunrise staffing discrepancy sent to CA Team .40	\$950.00	0.4	\$380.00								
10/1/2020	David Marks	Teleconference with Dr. David Lewin and Stephen Boedecker regarding Crandall testimony in other cases .20	\$950.00	0.2	\$190.00								
10/1/2020	David Marks	Teleconference with Boedecker regarding Crandall testimony .30	\$950.00	0.3	\$285.00								
10/1/2020	Jim Thornton	GoToMeeting with Blake Peters regarding analysis of Sunrise staffing methodology .6	\$500.00	0.6	\$300.00								
10/1/2020	Jim Thornton	Telephone call with David Marks regarding Crandall depo prep, reviewing Crandall's attack on the number of possible ADL combinations, and questions on Ward's statistical analysis 1.1	\$500.00	1.1	\$550.00								
10/1/2020	Jim Thornton	Continued work on updated permutations analysis 2.3	\$500.00	2.3	\$1,150.00								
10/1/2020	Jim Thornton	Telephone call with David Marks and Blake Peters regarding missing data .3	\$500.00	0.3	\$150.00								
10/1/2020	Jim Thornton	GoToMeeting review of revised permutation analysis and telephone call with David Marks regarding same 1.1	\$500.00	1.1	\$550.00								
10/1/2020	Jim Thornton	Detailed email to Blake Peters regarding updated permutations analysis and proofing .4	\$500.00	0.4	\$200.00								
10/1/2020	Jim Thornton	Created summary of task time consequences of permutations and sent to David Marks .8	\$500.00	0.8	\$400.00								
10/1/2020	Jim Thornton	Prepared list of questions from Crandall 1.1	\$500.00	1.1	\$550.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
10/2/2020	David Marks	Review Dr. Lewin's email regarding Crandall and federal opinion .50	\$950.00	0.5	\$475.00								
10/2/2020	David Marks	Compose email to Robin Workman about depo experience/cross-examination of Crandall .20	\$950.00	0.2	\$190.00								
10/2/2020	David Marks	Teleconference with Attorney Thornton and B. Peters discussing staffing analytics email regarding discrepancies between staffing data produced by Defendants, and review of Crandall's data compared to Peters' data .60	\$950.00	0.6	\$570.00								
10/2/2020	David Marks	Compose email to Attorney Umpierre regarding needing data tables/spreadsheets .90	\$950.00	0.9	\$855.00								
10/2/2020	David Marks	Teleconference with B. Peters regarding updated staffing, and review of updated staffing and compose additional email to Attorney Umpierre regarding same .7_	\$950.00	0.7	\$665.00								
10/2/2020	David Marks	Receipt and review email from Attorney Healey regarding draft staffing discrepancy letter (and correct date of production #1 receipt of staffing .10	\$950.00	0.1	\$95.00								
10/2/2020	David Marks	Review of Dr. Lewin's C.V. .10	\$950.00	0.1	\$95.00								
10/2/2020	David Marks	Compose email to CA Team regarding authority to consult with Attorney Lewin on statistical analysis .10	\$950.00	0.1	\$95.00								
10/2/2020	David Marks	Teleconference with Attorney Healey regarding Dr. Lewin and Ward analysis .20	\$950.00	0.2	\$190.00								
10/2/2020	David Marks	Review Ward and Crandall declarations for specific subjects for subpoenas 1.20	\$950.00	1.2	\$1,140.00								
10/2/2020	David Marks	Review of Crandall's past depo testimony (provided by Robin Workman) .2	\$950.00	0.2	\$190.00								
10/2/2020	David Marks	Teleconference with Attorney Thornton regarding Crandall's past depo testimony .6	\$950.00	0.6	\$570.00								
10/2/2020	David Marks	Review CDC 2014 specific Residential Care Center Benchmark and compare to Crandall 2016 Benchmark .80	\$950.00	0.8	\$760.00								
10/2/2020	David Marks	Teleconference with Attorney Healey regarding hiring Dr. David Lewin as consultant and discussion of Ward/Crandall findings .90	\$950.00	0.9	\$855.00								
10/2/2020	David Marks	GoToMeeting with Attorney Thornton regarding technical subpoena duces tecum requests for Sunrise experts Crandall and Ward 1.4	\$950.00	1.4	\$1,330.00								
10/2/2020	Jim Thornton	Work with David Marks regarding various prep depo issues .5	\$500.00	0.5	\$250.00								
10/2/2020	Jim Thornton	Work on CDC project for David Marks 1.9	\$500.00	1.9	\$950.00								
10/2/2020	Jim Thornton	Spoke with Dr. Cristina Flores regarding CDC project .3	\$500.00	0.3	\$150.00								
10/2/2020	Jim Thornton	GoToMeeting with David Marks regarding subpoena duces tecum requests for Crandall and Ward and transmittal email 1.4	\$500.00	1.4	\$700.00								
10/2/2020	Jim Thornton	Telephone call with David Marks and Blake Peters discussing Crandall attacks and discrepancies between staffing data produced by Defendants .6	\$500.00	0.6	\$300.00								
10/2/2020	Jim Thornton	Telephone call with David Marks regarding Crandall's past depo testimony .6	\$500.00	0.6	\$300.00								
10/2/2020	Jim Thornton	Email from Blake Peters regarding analysis and Crandall attacks .4	\$500.00	0.4	\$200.00								
10/2/2020	Jim Thornton	Received and reviewed Ward expert materials and reported to David Marks regarding what was included .4	\$500.00	0.4	\$200.00								
10/4/2020	David Marks	Review Crandall depo in Footlocker case 3.80	\$950.00	3.8	\$3,610.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
10/5/2020	Jacques Balette	Review draft of Plaintiffs' Opposition to Defendants' MTS Expert Declarations	\$750.00	1.1	\$825.00								
10/5/2020	Jacques Balette	Meet with Attorney Marks re: Crandall deposition	\$750.00	0.2	\$150.00								
10/5/2020	Jacques Balette	Review documents for Michael Ward deposition	\$750.00	2.2	\$1,650.00								
10/5/2020	Jacques Balette	Research background, testifying history, professional background of Michael P. Ward	\$750.00	2.7	\$2,025.00								
10/5/2020	Jacques Balette	Review prior declarations of Michael P. Ward, read prior depositions	\$750.00	4.2	\$3,150.00								
10/5/2020	David Marks	Teleconference with Attorney Thornton and B. Peters regarding status of Ward data analysis .30	\$950.00	0.3	\$285.00								
10/5/2020	David Marks	Review summary of financial pressure documents from Sunrise in OPS Manual, emails and depo exhibits .20	\$950.00	0.2	\$190.00								
10/5/2020	David Marks	Teleconference with Attorney Thornton and B. Peters regarding Ward's analysis - inability to replicate same, rechecking correlations, info he ignored, and Defendants' 2 primary arguments regarding same .70	\$950.00	0.7	\$665.00								
10/5/2020	David Marks	Review Attorney Thornton's proposed depo questions .30	\$950.00	0.3	\$285.00								
10/5/2020	David Marks	Compose email to Kurt Shampine discussing Ward analysis .10	\$950.00	0.1	\$95.00								
10/5/2020	David Marks	Compose email to David Lewin regarding possibility of serving as expert .10	\$950.00	0.1	\$95.00								
10/5/2020	David Marks	Teleconference with B. Peters regarding his analysis of Sept. 2020 staffing reports broken down by targeted staff, AL, REM, Terrace Club, Wellness and Edna's Place .40	\$950.00	0.4	\$380.00								
10/5/2020	David Marks	Review Federal Express Opinion striking part of Crandall's declaration and review of Crandall depo 1.70	\$950.00	1.7	\$1,615.00								
10/5/2020	David Marks	Meeting with Attorney Balette regarding examination questions following review of Crandall depo .20	\$950.00	0.2	\$190.00								
10/5/2020	David Marks	Review B. Peters' analysis of Ward data .5	\$950.00	0.5	\$475.00								
10/5/2020	David Marks	Multiple teleconferences with B. Peters regarding analysis and lack of required data .3	\$950.00	0.3	\$285.00								
10/5/2020	David Marks	Teleconference with Attorneys Johnson and Thornton regarding motion to compel hearing 1.00	\$950.00	1	\$950.00								
10/5/2020	David Marks	Review Attorney Healey draft opposition to strike Flores declaration 2.20	\$950.00	2.2	\$2,090.00								
10/5/2020	David Marks	Review CDS article 2014 vs. 2015-2016 data, and review email from Dr. Cristina Flores to authors regarding differences of same .30	\$950.00	0.3	\$285.00								
10/5/2020	Jim Thornton	GoToMeeting w/Blake Peters regarding Ward calculations .5	\$500.00	0.5	\$250.00								
10/5/2020	Jim Thornton	Continue work on Crandall dep prep questions .9	\$500.00	0.9	\$450.00								
10/5/2020	Jim Thornton	GoToMeeting w/Mark Johnson, David Marks regarding service plans versus assessment data 1.0	\$500.00	1	\$500.00								
10/5/2020	Jim Thornton	Received and reviewed PointClickCare download information and began process .5	\$500.00	0.5	\$250.00								
10/5/2020	Jim Thornton	Numerous emails regarding systems and census issues .3	\$500.00	0.3	\$150.00								
10/5/2020	Jim Thornton	Emails with Blake Peters regarding census matches .3	\$500.00	0.3	\$150.00								
10/5/2020	Jim Thornton	Emails with David Marks regarding Dr. Cristina Flores and RealPage system .3	\$500.00	0.3	\$150.00								
10/5/2020	Jim Thornton	Emails from David Marks and Dr. Cristina Flores regarding CDC analysis .4	\$500.00	0.4	\$200.00								
10/5/2020	Jim Thornton	Telephone call with David Marks and Blake Peters regarding status of Ward data analysis .3	\$500.00	0.3	\$150.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
10/5/2020	Jim Thornton	Telephone call with David Marks regarding Ward's analysis and inability to replicate same .7	\$500.00	0.7	\$350.00								
10/5/2020	Jim Thornton	Received and reviewed emails from Blake Peters regarding actual versus target staffing by job title .2	\$500.00	0.2	\$100.00								
10/6/2020	Jacques Balette	Review documents produced as part of Michael P. Ward's designation, compare to documents available, cross-reference workload	\$750.00	3.3	\$2,475.00								
10/6/2020	David Marks	Review Crandall declaration for prep of depo 1.20	\$950.00	1.2	\$1,140.00								
10/6/2020	David Marks	Teleconference/GoToMeeting with Attorney Thornton and B. Peters regarding staffing analysis and comparison of same to Ward graphs 5.1	\$950.00	5.1	\$4,845.00								
10/6/2020	David Marks	Prep for Crandall depo - comparison of Crandall declaration attachments to Dr. Cristina Flores' list of authoritative literature, review Crandall invoices, Mosby's "Do Not Rush Care" literature, Sunrise Alzheimer's/dementia data 1.70	\$950.00	1.7	\$1,615.00								
10/6/2020	David Marks	Review declaration draft to authenticate Watermark task time and compose email to CA Team regarding same .4	\$950.00	0.4	\$380.00								
10/6/2020	Jim Thornton	GoToMeeting and calls w/David Marks and Blake Peters regarding staffing analysis and Ward graphs 5.1	\$500.00	5.1	\$2,550.00								
10/6/2020	Jim Thornton	Review of Crandall dec .4	\$500.00	0.4	\$200.00								
10/7/2020	Jacques Balette	Assist in preparation of Ward deposition	\$750.00	2.4	\$1,800.00								
10/7/2020	David Marks	Compose email to Dr. Schnelle regarding relevance of ADL task times in nursing homes to ALFs and video software used for task times .20	\$950.00	0.2	\$190.00								
10/7/2020	David Marks	Review Abe's Garden journal article regarding ADL task times in ALFs .20	\$950.00	0.2	\$190.00								
10/7/2020	David Marks	Teleconference with Attorney Thornton regarding status of search for ADL task times in ALFs similar to nursing homes (Abe's Garden paper) .20	\$950.00	0.2	\$190.00								
10/7/2020	David Marks	Review Court Order on Plaintiffs' Motion to Compel - denying ISP in database .20	\$950.00	0.2	\$190.00								
10/7/2020	David Marks	Compose email to Attorneys Umpierre and Thornton with inquiry about Flores reliance on Mosley text book, right and wrong way to deliver ADL care, and Crandall's lack of qualification to recognize the difference .60	\$950.00	0.6	\$570.00								
10/7/2020	David Marks	Review and discuss with B. Peters the actual staffing spreadsheet for all Sunrise facilities .70	\$950.00	0.7	\$665.00								
10/7/2020	David Marks	Teleconference with Attorney Thornton and B. Peters regarding comparison of B. Peters' PPD staffing to 2015 CDC ALF PPD stats .7	\$950.00	0.7	\$665.00								
10/7/2020	David Marks	Compose email to TSG requesting to use Zoom for depo due to past difficulties .1	\$950.00	0.1	\$95.00								
10/7/2020	David Marks	Teleconference with Attorney Thornton regarding problem uploading Excel .1	\$950.00	0.1	\$95.00								
10/7/2020	David Marks	Review status of reimbursement for expert costs paid by MBGY .10	\$950.00	0.1	\$95.00								
10/7/2020	David Marks	Review Crandall declaration for references to Alzheimer's residents and sources of his information 1.60	\$950.00	1.6	\$1,520.00								
10/7/2020	David Marks	Teleconference with Dr. David Lewin regarding incentive system .90	\$950.00	0.9	\$855.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
10/7/2020	David Marks	Teleconference with Attorney Healey regarding Dr. Lewin's engagement 1.00	\$950.00	1		\$950.00								
10/7/2020	David Marks	Review Ward declaration for key points requiring Dr. Lewin association and review B. Peters new analysis of target vs. actual 1.30	\$950.00	1.3		\$1,235.00								
10/7/2020	David Marks	Compose email to Dr. Lewin regarding conflicts and budget .10	\$950.00	0.1		\$95.00								
10/7/2020	David Marks	Teleconference with Attorney Thornton regarding Crandall's staffing opinion that CDC data "establishes national benchmarks" and supports Sunrise's claim of adequate staffing levels 1.5 "	\$950.00	1.5		\$1,425.00								
10/7/2020	Jim Thornton	Telephone call w/David Marks regarding CDC issues 1.5	\$500.00	1.5		\$750.00								
10/7/2020	Jim Thornton	GoToMeeting w/Dr. Cristina Flores .8	\$500.00	0.8		\$400.00								
10/7/2020	Jim Thornton	Telephone call with David Marks regarding problem uploading Excel .2	\$500.00	0.2		\$100.00								
10/7/2020	Jim Thornton	Telephone call with David Marks regarding ADL task times in ALFs .2	\$500.00	0.2		\$100.00								
10/8/2020	Jacques Balette	Research background, testifying history, professional background of Robert Crandall	\$750.00	3.1		\$2,325.00								
10/8/2020	David Marks	Teleconference with B. Peters regarding status of staffing target vs. actual update .10	\$950.00	0.1		\$95.00								
10/8/2020	David Marks	Formulate depo questions derived from Ward declaration 4.50	\$950.00	4.5		\$4,275.00								
10/8/2020	David Marks	Teleconference with Attorney Thornton regarding latest staffing analysis (target vs. actual) broken down on Hr PPD basis 1.10	\$950.00	1.1		\$1,045.00								
10/8/2020	David Marks	Teleconference with Attorney Healey regarding Ward declaration 1.30	\$950.00	1.3		\$1,235.00								
10/8/2020	David Marks	Review of and teleconference with Attorney Thornton to discuss comparison of B. Peters' data regarding CDC 2014 PPDs for Alzheimer's ADL, ALFs vs. Sunrise updated staffing for 2 ALF and REM .80	\$950.00	0.8		\$760.00								
10/8/2020	Jim Thornton	Calls and GoToMeeting w/David Marks regarding latest staffing analysis target vs. actual broken down on Hr PPD basis 1.1	\$500.00	1.1		\$550.00								
10/8/2020	Jim Thornton	Telephone call with David Marks to discuss comparison of Peters' data regarding CDC vs. Sunrise updated staffing .9	\$500.00	0.9		\$450.00								
10/9/2020	Jacques Balette	Review prior declarations of Robert Crandall and internet search for prior work 3.1	\$750.00	3.1		\$2,325.00								
10/9/2020	Jacques Balette	Confer with various plaintiffs' attorneys with experience with witness Robert Crandall 1.0	\$750.00	1		\$750.00								
10/9/2020	David Marks	Prep for Ward depo 2.30	\$950.00	2.3		\$2,185.00								
10/9/2020	David Marks	Prep for ProModel telephone call regarding Ward analysis .2	\$950.00	0.2		\$190.00								
10/9/2020	David Marks	Multiple teleconferences with Attorney Thornton regarding ProModel analysis of Ward .4	\$950.00	0.4		\$380.00								
10/9/2020	David Marks	GoToMeeting with Attorney Thornton and Kurt Shampine regarding analysis of Ward graphics/declaration .90	\$950.00	0.9		\$855.00								
10/9/2020	David Marks	Prep for Dr. David Lewin telephone call regarding Ward actual vs. targeted staffing analysis .70	\$950.00	0.7		\$665.00								
10/9/2020	David Marks	Additional teleconference with Dr. Lewin regarding statistical questions raised in Ward declaration 1.00	\$950.00	1		\$950.00								
10/9/2020	David Marks	Continue depo question prep and exam prep of Ward flaws 3.30	\$950.00	3.3		\$3,135.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
10/9/2020	Jim Thornton	Multiple telephone calls with David Marks regarding ProModel analysis and prep for ProModel telephone call .4	\$500.00	0.4	\$200.00								
10/9/2020	Jim Thornton	GoToMeeting w/David Marks, Kurt Shampine regarding Ward analysis .9	\$500.00	0.9	\$450.00								
10/11/2020	David Marks	Continue developing questions from Ward declaration and 70+ line graphs/bar charts 2.20	\$950.00	2.2	\$2,090.00								
10/12/2020	Jacques Balette	Gather and review materials for Michael Ward's deposition	\$750.00	2.8	\$2,100.00								
10/12/2020	Jacques Balette	Meeting with Attorney Marks re: financial incentive proof	\$750.00	0.2	\$150.00								
10/12/2020	David Marks	Gather all exhibits for depo, organize Ward materials, and continue depo exam prep 1.70	\$950.00	1.7	\$1,615.00								
10/12/2020	David Marks	Teleconference with Attorney Thornton to discuss receipt of Ward declaration tables and content .30	\$950.00	0.3	\$285.00								
10/12/2020	David Marks	GoToMeeting with Attorney Thornton and B. Peters regarding Ward's table and analysis, the To Do list for Peters 3.20	\$950.00	3.2	\$3,040.00								
10/12/2020	David Marks	Regarding the Tom Berry depo, send and receipt/review emails to/from Attorney Stebner regarding Sunrise pressure by corporate to hit targets .20	\$950.00	0.2	\$190.00								
10/12/2020	David Marks	Regarding the Tom Berry depo, send and receipt/review emails regarding timing of Flores recommendation of intern at Sunrise in relationship to her review of Sunrise documents .30	\$950.00	0.3	\$285.00								
10/12/2020	David Marks	Continue prep for Ward depo exam (impact of resident characteristics, review "exhibits regarding responsiveness" of actuals to target hours 3.80	\$950.00	3.8	\$3,610.00								
10/12/2020	David Marks	Meeting with Attorney Balette regarding financial incentive proof .20	\$950.00	0.2	\$190.00								
10/12/2020	David Marks	Teleconference with Attorney Thornton regarding new data received from Ward and his responsive analysis .90	\$950.00	0.9	\$855.00								
10/12/2020	David Marks	Meeting with Diane Asher regarding Ward depo notebook organization and exhibits .20	\$950.00	0.2	\$190.00								
10/12/2020	David Marks	Review Ward's ED dates of employment (SUN102675) .60	\$950.00	0.6	\$570.00								
10/12/2020	David Marks	Administrative review of outstanding expert invoices and payments made by MBGY to experts .10	\$950.00	0.1	\$95.00								
10/12/2020	David Marks	Compose email to Attorney Healey regarding same .10	\$950.00	0.1	\$95.00								
10/12/2020	Diane Asher	Meeting with Attorney Marks re: drafting Ward notebook	\$85.00	0.2	\$17.00								
10/12/2020	Jim Thornton	Telephone call with David Marks regarding Ward tables .3	\$500.00	0.3	\$150.00								
10/12/2020	Jim Thornton	Multiple GoToMeetings with David Marks and Blake Peters regarding Ward tables 3.2	\$500.00	3.2	\$1,600.00								
10/12/2020	Jim Thornton	Work on responsiveness analysis related to Ward tables 2.7	\$500.00	2.7	\$1,350.00								
10/12/2020	Jim Thornton	Telephone call with David Marks regarding new data received from Ward and responsive analysis .9	\$500.00	0.9	\$450.00								
10/13/2020	Jacques Balette	Gather, review, organize documents, and index all exhibits for Michael Ward's deposition	\$750.00	3.4	\$2,550.00								
10/13/2020	Jacques Balette	Review email from Attorney Marks re: transmitting financial incentive exhibits and procedure for Zoom depositions	\$750.00	0.2	\$150.00								
10/13/2020	David Marks	GoToMeeting with Attorney Thornton, Dale Schroyer, Kurt Shampine and Dave Tucker regarding issues/problems in Ward's analysis 1.30	\$950.00	1.3	\$1,235.00								
10/13/2020	David Marks	Compose email to Attorney Healey regarding need for Kennedy to review Ward material .10	\$950.00	0.1	\$95.00								
10/13/2020	David Marks	Review of B. Peters daily staffing analysis and meeting with B. Peters regarding same .3	\$950.00	0.3	\$285.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
10/13/2020	David Marks	Compose email to Attorney Healey regarding Kennedy analysis and rate of pay for caregiver by job title .20	\$950.00	0.2	\$190.00								
10/13/2020	David Marks	Draft new questions for Ward depo, and merge into outline/question flow 5.30	\$950.00	5.3	\$5,035.00								
10/13/2020	David Marks	GoToMeeting with Attorney Thornton to review daily staffing (actual vs. target) implications 1.20	\$950.00	1.2	\$1,140.00								
10/13/2020	David Marks	Review B. Peters analysis and revise outline .90	\$950.00	0.9	\$855.00								
10/13/2020	David Marks	Teleconference with Attorney Healey regarding financial incentive exhibits and B. Peters daily staffing analysis (SUN102626) .60	\$950.00	0.6	\$570.00								
10/13/2020	David Marks	Teleconference with Attorney Thornton regarding depo question for Ward depo .60	\$950.00	0.6	\$570.00								
10/13/2020	David Marks	Review exhibits for Ward depo .40	\$950.00	0.4	\$380.00								
10/13/2020	David Marks	Compose email to Attorney Thornton .10	\$950.00	0.1	\$95.00								
10/13/2020	David Marks	Compose email to Attorney Balette transmitting financial incentive exhibits, and discussing Zoom depo procedures .20	\$950.00	0.2	\$190.00								
10/13/2020	David Marks	Compose multiple emails to Attorney Healey, Attorney Thornton and B. Peters regarding analysis and key Ward depo exhibits .40	\$950.00	0.4	\$380.00								
10/13/2020	Jim Thornton	GoToMeeting with David Marks, Dale Schroyer, Kurt Shampine and Dave Tucker regarding issues/problems in Ward's analysis 1.3	\$500.00	1.3	\$650.00								
10/13/2020	Jim Thornton	Work on revised permutations analysis based on 2017 points system 2.2	\$500.00	2.2	\$1,100.00								
10/13/2020	Jim Thornton	Work on revised permutations analysis based on 2018 points system 1.3	\$500.00	1.3	\$650.00								
10/13/2020	Jim Thornton	Work on revised permutations analysis based on 2019 points system 1.3	\$500.00	1.3	\$650.00								
10/13/2020	Jim Thornton	Work with David Marks and Blake Peters regarding September 2019 changes in staffing and analysis of actual and targets before and after changes 1.2	\$500.00	1.2	\$600.00								
10/13/2020	Jim Thornton	Conference call w/Chris Healey, Guy Wallace, David Marks .6	\$500.00	0.6	\$300.00								
10/13/2020	Jim Thornton	GoToMeeting with David Marks to review daily staffing--actual vs. target--implications 1.0	\$500.00	1.0	\$500.00								
10/14/2020	Jacques Balette	Assist in preparation of Ward deposition	\$750.00	1.9	\$1,425.00								
10/14/2020	David Marks	Continue to finalize depo outline/questions for Ward depo 1.50	\$950.00	1.5	\$1,425.00								
10/14/2020	David Marks	Multiple GoToMeetings with Attorney Thornton to finalize depo exam of Ward 11.40	\$950.00	11.4	\$10,830.00	11.4	\$10,830.00						
10/14/2020	Jim Thornton	GoToMeeting w/Blake Peters regarding Ward analysis .4	\$500.00	0.4	\$200.00								
10/14/2020	Jim Thornton	Work on Ward depo prep 1.2	\$500.00	1.2	\$600.00								
10/14/2020	Jim Thornton	Marathon GoToMeeting session w/ David Marks regarding prep for Ward depo 11.4	\$500.00	11.4	\$5,700.00	11.4	\$5,700.00						
10/15/2020	Jacques Balette	Attend Ward deposition	\$750.00	4	\$3,000.00								
10/15/2020	Jacques Balette	Prepare documents used during Ward deposition, index documents not used, re-organize remaining records for future witnesses	\$750.00	2.3	\$1,725.00								
10/15/2020	Jacques Balette	Prepare outline of questions for future witnesses not addressed in Ward deposition	\$750.00	1.5	\$1,125.00								
10/15/2020	David Marks	Pre-depo depo final prep for Ward depo 3.50	\$950.00	3.5	\$3,325.00								
10/15/2020	David Marks	Attend Ward depo 4.00	\$950.00	4	\$3,800.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
<u>Fees</u>														
10/15/2020	David Marks	Prepare summary of Ward depo 1.30	\$950.00	1.3		\$1,235.00								
10/15/2020	David Marks	Teleconference with Attorney Thornton re: summary of high points 0.40	\$950.00	0.4		\$380.00								
10/15/2020	Jim Thornton	Final prep for Ward deposition with David Marks 3.5	\$500.00	3.5		\$1,750.00								
10/15/2020	Jim Thornton	Attended Ward deposition 4.0	\$500.00	4		\$2,000.00								
10/15/2020	Jim Thornton	Lengthy phone call post mortem with JB and David Marks regarding summary of high points .4	\$500.00	0.4		\$200.00								
10/16/2020	Jacques Balette	Finalize outline of future witness deposition topics	\$750.00	1.2		\$900.00								
10/16/2020	David Marks	Review billing from experts and updated spreadsheet of costs and call to Clayton Cain regarding same .4	\$950.00	0.4		\$380.00								
10/16/2020	David Marks	Receipt and review email from Kurt Shampine regarding past due ProModel invoice .10	\$950.00	0.1		\$95.00								
10/16/2020	David Marks	Review updated expert costs spreadsheets from Cain .10	\$950.00	0.1		\$95.00								
10/16/2020	David Marks	Review B. Peters' analysis of total caregivers (by job title) - actual vs. target, and GoToMeeting with Attorney Thornton and B. Peters regarding same and discuss Crandall's recent production of documents 1.50	\$950.00	1.5		\$1,425.00								
10/16/2020	David Marks	Compose email to Attorney Umpierre regarding purchase/use of RealPage .10	\$950.00	0.1		\$95.00								
10/16/2020	David Marks	Teleconference with Attorney Healey regarding update on Ward depo, Watermark exhibit, and statical analysis needed .60	\$950.00	0.6		\$570.00								
10/16/2020	David Marks	Compose email to Attorney Healey transmitting most recent analysis by B. Peters of Actual vs. Target Hrs for all job titles .10	\$950.00	0.1		\$95.00								
10/16/2020	David Marks	Teleconference with Attorney Healey regarding Welch Consulting invoice, and forward same .10	\$950.00	0.1		\$95.00								
10/16/2020	David Marks	Review updated expert costs spreadsheet and reconcile new invoices and funds received and discuss same with Cain .8	\$950.00	0.8		\$760.00								
10/16/2020	Jim Thornton	GoToMeeting w/Blake Peters and David Marks regarding actual vs. target analysis 1.5	\$500.00	1.5		\$750.00								
10/16/2020	Jim Thornton	W/on analysis of days where actual staffing is above target and sent to Blake Peters .3	\$500.00	0.3		\$150.00								
10/16/2020	Jim Thornton	Received and reviewed objections and responses to Crandall subpoena .4	\$500.00	0.4		\$200.00								
10/16/2020	Jim Thornton	Received and reviewed emails with Brian Umpierre and David Marks regarding RealPage software .2	\$500.00	0.2		\$100.00								
10/16/2020	Jim Thornton	Work on Crandall deposition prep and sent materials related to same to David Marks 1.3	\$500.00	1.3		\$650.00								
10/16/2020	Jim Thornton	Received and reviewed letter from Allyn regarding specific staffing data questions and email from Chris Healey related to same .4	\$500.00	0.4		\$200.00								
10/17/2020	David Marks	Prep exam questions for Crandall depo 3.30	\$950.00	3.3		\$3,135.00								
10/17/2020	Jim Thornton	Received and reviewed email from Chris Healey regarding upcoming depositions .1	\$500.00	0.1		\$50.00								
10/17/2020	Jim Thornton	Received and reviewed wish list from Chris Healey for Crandall deposition subject matters .3	\$500.00	0.3		\$150.00								
10/17/2020	Jim Thornton	Received and reviewed list of Crandall depo areas from David Marks .3	\$500.00	0.3		\$150.00								
10/18/2020	David Marks	Continue prep of exam questions for Crandall depo 3.50	\$950.00	3.5		\$3,325.00								
10/19/2020	Jacques Balette	Continue reviewing prior sworn testimony of Robert Crandall	\$750.00	4.5		\$3,375.00								

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						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
10/19/2020	Jacques Balette	Meeting with Attorney Marks re: deposition strategy for upcoming Robert Crandall deposition	\$750.00	0.4	\$300.00								
10/19/2020	David Marks	Meeting with Attorney Balette to discuss Crandall depo strategy .40	\$950.00	0.4	\$380.00								
10/19/2020	David Marks	Organize cross-exam topics and order of exam, and note key language from Flores declaration for Crandall exam 1.00	\$950.00	1	\$950.00								
10/19/2020	David Marks	Teleconference with Attorney Thornton to review and discuss Sunrise Sunnyvale and Beverly Hill staffing analysis for upcoming depositions of Sunrise employees, and Crandall depo exam 2.50	\$950.00	2.5	\$2,375.00								
10/19/2020	David Marks	Compose email with attached corrected staffing spreadsheet on Sunnyvale and Beverly Hills to Attorney Healey and explaining same .20	\$950.00	0.2	\$190.00								
10/19/2020	David Marks	Continue work on technical questions for Crandall exam, review Edna Musoke declaration 5.3	\$950.00	5.3	\$5,035.00								
10/19/2020	David Marks	Compose email to CA Team and Attorney Thornton regarding ADL issues .3	\$950.00	0.3	\$285.00								
10/19/2020	David Marks	Review Sunnyvale and Beverly Hill staffing data question .10	\$950.00	0.1	\$95.00								
10/19/2020	David Marks	Teleconference with B. Peters regarding same, then compose email to Attorney Healey regarding response to same .10	\$950.00	0.1	\$95.00								
10/19/2020	Jim Thornton	GoToMeeting and telephone call with David Marks to review and discuss specific staffing analyses for upcoming depositions of Sunrise employees, and Crandall depo exam 2.5	\$500.00	2.5	\$1,250.00								
10/19/2020	Jim Thornton	W/on in depth review of multiple articles ignored by Crandall and prepared detailed set of questions related to same for deposition 3.6	\$500.00	3.6	\$1,800.00								
10/19/2020	Jim Thornton	Prepared set of articles for use as exhibits in Crandall depo and sent to David Marks .3	\$500.00	0.3	\$150.00								
10/19/2020	Jim Thornton	Multiple emails with team related to Crandall invoice .3	\$500.00	0.3	\$150.00								
10/19/2020	Jim Thornton	Emails from team regarding San Raphael questions .2	\$500.00	0.2	\$100.00								
10/19/2020	Jim Thornton	Review of Beverly Hills and Sunnyvale staffing data .3	\$500.00	0.3	\$150.00								
10/19/2020	Jim Thornton	Received and brief review of latest version of Crandall depo outline from David Marks .2	\$500.00	0.2	\$100.00								
10/20/2020	Jacques Balette	Assist in preparation of Robert Crandall deposition	\$750.00	5.5	\$4,125.00								
10/20/2020	David Marks	Continue work on technical depo questions for Crandall expert technical depo 2.30	\$950.00	2.3	\$2,185.00								
10/20/2020	David Marks	GoToMeeting with Attorney Thornton regarding Crandall depo exam 1.50	\$950.00	1.5	\$1,425.00								
10/20/2020	David Marks	2 additional GoToMeetings with Attorney Thornton to continue technical depo prep for Crandall depo by reviewing Dr. Cristina Flores authoritative literature cited, developing examination regarding "Flores support" for her declaration 8.30	\$950.00	8.3	\$7,885.00	8.3	\$7,885.00						
10/20/2020	Jim Thornton	Multiple GoToMeetings w/David Marks regarding preparation for Crandall depositions and his deposition outline and proposed exhibits 9.8	\$500.00	9.8	\$4,900.00	9.8	\$4,900.00						
10/21/2020	Jacques Balette	Gather, review, organize documents, and index all exhibits for Robert Crandall's deposition	\$750.00	3.6	\$2,700.00								
10/21/2020	Jacques Balette	Review Crandall deposition outline, edit, organize, confer with team, coordinate with attendees, prepare summary of potential responses to objections and scope of examination	\$750.00	6.6	\$4,950.00	6.6	\$4,950.00						

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						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
10/21/2020	David Marks	Continue expert technical prep for Crandall depo - work on depo outline/questions 7.1	\$950.00	2.9	\$2,755.00								
10/21/2020	David Marks	Meeting with Attorney Balette to prep for Crandall depo 1.4	\$950.00	1.4	\$1,330.00								
10/21/2020	David Marks	GoToMeeting with Attorney Thornton to review and discuss (1) staffing in other RCFE's in California; (2) Authoritative literature regarding ADL task times; (3) revised Crandall outline; (4) task time background; (5) Crandall declaration key points; (6) exhibits relied upon and time spent reviewing; (7) lack of qualification; (8) lack of knowledge regarding resident care needs/diagnoses; (8) basis for each claim that Dr. Flores opinion are unsupported 7.80	\$950.00	7.8	\$7,410.00	7.8	\$7,410.00						
10/21/2020	David Marks	Teleconference with Attorney C. Healey regarding Crandall preparation .20	\$950.00	0.2	\$190.00								
10/21/2020	Jim Thornton	GoToMeetings w/David Marks in prep for Crandall deposition 7.8	\$500.00	7.8	\$3,900.00	7.8	\$3,900.00						
10/21/2020	Jim Thornton	W/on various edits to Crandall depo outline and sent to David Marks 3.1	\$500.00	3.1	\$1,550.00								
10/21/2020	Jim Thornton	Detailed review of Musoke deposition and Crandall misrepresentations for purposes of his deposition .8	\$500.00	0.8	\$400.00								
10/21/2020	Jim Thornton	Created main points checklist for Crandall depo and sent to David Marks and Jacques Balette .4	\$500.00	0.4	\$200.00								
10/22/2020	Jacques Balette	Final deposition prep of Robert Crandall, organize records, participate in final outline	\$750.00	3.2	\$2,400.00								
10/22/2020	Jacques Balette	Attend deposition of Robert Crandall	\$750.00	7.8	\$5,850.00	7.8	\$5,850.00						
10/22/2020	Jacques Balette	Identify documents not used in deposition or Robert Crandall, organize for future witnesses	\$750.00	1.2	\$900.00								
10/22/2020	David Marks	Final depo prep for Crandall depo, and organization of depo exam with exhibits 3.20	\$950.00	3.2	\$3,040.00								
10/22/2020	David Marks	Attend depo of Crandall 7.80	\$950.00	7.8	\$7,410.00	7.8	\$7,410.00						
10/22/2020	Jim Thornton	Emails regarding Mosby textbook and providing it to Sunrise .3	\$500.00	0.3	\$150.00								
10/22/2020	Jim Thornton	Final depo prep w/David Marks for Crandall depo and organization of depo exam 3.2	\$500.00	3.2	\$1,600.00								
10/22/2020	Jim Thornton	Attended depo of Crandall 7.8	\$500.00	7.8	\$3,900.00	7.8	\$3,900.00						
10/22/2020	Jim Thornton	Review of Sunrise feeding times .3	\$500.00	0.3	\$150.00								
10/23/2020	Jacques Balette	Confer with Attorney Marks re: key points for Dr. Cristina Flores reply	\$750.00	0.5	\$375.00								
10/23/2020	Jacques Balette	Outline key topics addressed in Crandall deposition	\$750.00	1.3	\$975.00								
10/23/2020	Jacques Balette	Review Motions to Exclude	\$750.00	0.8	\$600.00								
10/23/2020	David Marks	Review emails, depo summaries from Sunrise witnesses and Sunrise representative memo, and respond to request for staffing data 3.10	\$950.00	3.1	\$2,945.00								
10/23/2020	David Marks	Compose email to Attorneys Healey and Kurt Shampine (ProModel) regarding payment of past due invoices .20	\$950.00	0.2	\$190.00								
10/23/2020	David Marks	Review depo notes for summary of Crandall depo 2.00	\$950.00	2	\$1,900.00								
10/23/2020	David Marks	GoToMeeting with Attorney Thornton and Dr. Cristina Flores regarding Flores reply declaration 3.80	\$950.00	3.8	\$3,610.00								
10/23/2020	David Marks	Meeting with Attorney Balette to discuss key points .50	\$950.00	0.5	\$475.00								
10/23/2020	Jim Thornton	GoToMeeting with David Marks and Dr. Cristina Flores regarding Flores reply declaration 3.8	\$500.00	3.8	\$1,900.00								
10/23/2020	Jim Thornton	Work on reply dec for Flores .4	\$500.00	0.4	\$200.00								

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						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
10/23/2020	Jim Thornton	Received and reviewed multiple emails regarding Crandall deposition and report to team .3	\$500.00	0.3	\$150.00								
10/26/2020	Jacques Balette	Pull Watermark documents, research prior discovery to Watermark in other litigation, and assist in subpoena preparation to Watermark	\$750.00	2.1	\$1,575.00								
10/26/2020	Jacques Balette	Review DWQ from Attorney Marks	\$750.00	0.2	\$150.00								
10/26/2020	David Marks	Review updates for Attorney Healey on funding of experts .10	\$950.00	0.1	\$95.00								
10/26/2020	David Marks	Receipt and review DWQ by Attorney Umpierre for Watermark task times, and forward same to Attorneys Balette, Thornton and Young for discussion .3	\$950.00	0.3	\$285.00								
10/26/2020	David Marks	Teleconference with Attorney Young regarding Watermark task times and DWQ .2	\$950.00	0.2	\$190.00								
10/26/2020	David Marks	Data analysis of 2014 CDC National Health Statistics Report on ALF staffing (facilities primarily serving residents with any ADLs vs. those that do not) vs. Sunrise AL staffing 1.9	\$950.00	1.9	\$1,805.00								
10/26/2020	David Marks	Compose email to CA Team describing comparative analysis to CA Team .4	\$950.00	0.4	\$380.00								
10/26/2020	David Marks	Teleconference with Attorney Healey regarding Kennedy authority to sponsor staffing data (message left) .10	\$950.00	0.1	\$95.00								
10/26/2020	David Marks	Additional teleconference with Attorney Healey regarding Kennedy and the staffing, aides, REM comparison, adherence to targets, understaffing based on target of 55% of days, and permutation analysis .90	\$950.00	0.9	\$855.00								
10/26/2020	Jim Thornton	Received and reviewed updated PPD analysis from Blake Peters .3	\$500.00	0.3	\$150.00								
10/26/2020	Jim Thornton	Work on national benchmark claims by Crandall and reviewed emails from David Marks regarding same 1.4	\$500.00	1.4	\$700.00								
10/27/2020	David Marks	Teleconference with B. Peters regarding adding coordinators to Sunrise into comparison of CDC staffing vs. Sunrise, and send same to CA Team .30	\$950.00	0.3	\$285.00								
10/27/2020	David Marks	Teleconference with Dr. Cristina Flores regarding CDC 2014 data and RealPage software .30	\$950.00	0.3	\$285.00								
10/27/2020	Jim Thornton	GoToMeeting with Blake Peters regarding service code key project .6	\$500.00	0.6	\$300.00								
10/27/2020	Jim Thornton	Continue work on national benchmark claims by Crandall .3	\$500.00	0.3	\$150.00								
10/28/2020	Jim Thornton	Emails with Ed Jones regarding schedule .1	\$500.00	0.1	\$50.00								
10/28/2020	Jim Thornton	GoToMeeting with Blake Peters continuing work on service code key project .5	\$500.00	0.5	\$250.00								
10/28/2020	Jim Thornton	Emails with Diane Asher and David Marks regarding confidentiality agreements .1	\$500.00	0.1	\$50.00								
10/28/2020	Jim Thornton	Pull of unique rows of assessment data and work on service code analysis 3.9	\$500.00	3.9	\$1,950.00								
10/29/2020	Jacques Balette	T/C with Attorney Marks re: Watermark subpoena	\$750.00	0.2	\$150.00								
10/29/2020	David Marks	Review emails regarding Dr. Edward Jones and status of Sunrise assessment data .20	\$950.00	0.2	\$190.00								
10/29/2020	David Marks	Teleconference with Attorney Balette regarding review and discuss DWQ for Watermark task times .20	\$950.00	0.2	\$190.00								
10/29/2020	Jim Thornton	Email to Ed Jones regarding rescheduling GoToMeeting due to power outage .1	\$500.00	0.1	\$50.00								
10/30/2020	David Marks	Teleconference with Attorney Thornton regarding 1) billing, 2) status of Sunrise assessment analysis .30	\$950.00	0.3	\$285.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	<u>Fees</u>												
10/30/2020	David Marks	Teleconference with Diane Asher regarding billing update .20	\$950.00	0.2	\$190.00								
10/30/2020	Diane Asher	Confer with Attorney Marks re: billing update	\$85.00	0.2	\$17.00								
10/30/2020	Jim Thornton	Telephone call with David Marks regarding billing and Sunrise assessment analysis .3	\$500.00	0.3	\$150.00								
10/31/2020	Jacques Balette	Review amended Watermark subpoena, edit, circulate	\$750.00	0.5	\$375.00								
10/31/2020	Jacques Balette	T/C with Attorney Marks re: Amended Watermarks subpoena	\$750.00	0.2	\$150.00								
10/31/2020	David Marks	Teleconference with Attorney Balette regarding Watermark DWQ .20	\$950.00	0.2	\$190.00								
11/1/2020	David Marks	Review Watermark Interpretive Guidelines and revise Watermark DWQ, and forward same to CA Team .80	\$950.00	0.8	\$760.00								
11/1/2020	Jim Thornton	Received and reviewed highlights from Sunrise document production from Brian Umpierre and David Marks .2	\$500.00	0.2	\$100.00								
11/2/2020	Jacques Balette	Continue working on revised Amended Watermark subpoena	\$750.00	0.3	\$225.00								
11/2/2020	David Marks	Teleconference with Attorney Thornton regarding service code key status .40	\$950.00	0.4	\$380.00								
11/2/2020	David Marks	Teleconference with Dr. Edward Jones regarding assessment data .10	\$950.00	0.1	\$95.00								
11/2/2020	David Marks	Review of "AHCA Award" documents pulled by Megan and sent 10.31.20 .60	\$950.00	0.6	\$570.00								
11/2/2020	David Marks	Review B. Peters' REM vs. CDC staffing .2	\$950.00	0.2	\$190.00								
11/2/2020	David Marks	Telephone call with B. Peters regarding Sunrise REM comparison to 2014 CDC Alzheimer's staffing levels .1	\$950.00	0.1	\$95.00								
11/2/2020	David Marks	Request (email) for Life Enrichment Manager job title .10	\$950.00	0.1	\$95.00								
11/2/2020	David Marks	Review B. Peters' targets vs. actual .10	\$950.00	0.1	\$95.00								
11/2/2020	David Marks	Schedule call with Dr. Kennedy/B. Peters regarding staffing .10	\$950.00	0.1	\$95.00								
11/2/2020	David Marks	Teleconference with B. Peters regarding staffing analyses .4	\$950.00	0.4	\$380.00								
11/2/2020	David Marks	Compose email to Attorney Healey, Attorney Thornton and B. Peters regarding updates and To Do list .3	\$950.00	0.3	\$285.00								
11/2/2020	David Marks	Review REM coordinator job description and formulate questions for upcoming depo of Kelly, REM coordinator, and send same to CA Team 2.30	\$950.00	2.3	\$2,185.00								
11/2/2020	David Marks	Teleconference with Diane Asher regarding status of Sunrise billing .10	\$950.00	0.1	\$95.00								
11/2/2020	David Marks	Teleconference and GoToMeeting with Dr. Cristina Flores regarding RealPage purchase and research 1.10	\$950.00	1.1	\$1,045.00								
11/2/2020	David Marks	Review and forward Flores RealPage proposal to Attorney Healey .20	\$950.00	0.2	\$190.00								
11/2/2020	David Marks	Compose email to Kurt Shampine regarding payment of ProModel invoices .10	\$950.00	0.1	\$95.00								
11/2/2020	David Marks	Review "Watermark Guidelines" and review Attorney Healey DWQ response/edits, and recommended not sending a DWQ, but a 30(b)(6) notice instead .80	\$950.00	0.8	\$760.00								
11/2/2020	David Marks	Compose additional email to CA Team regarding REM Life Enrichment Manager .10	\$950.00	0.1	\$95.00								
11/2/2020	David Marks	Review B. Peters' updates on target vs. actual consistent with Ward FN3 .50	\$950.00	0.5	\$475.00								
11/2/2020	David Marks	Teleconference with Attorney Thornton regarding Dr. Jones' briefing regarding "encoding" the assessment data .30	\$950.00	0.3	\$285.00								
11/2/2020	David Marks	Review and respond to question regarding depo of Sunrise task time person and the need for interpretative/code for task time data .10	\$950.00	0.1	\$95.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
<u>Fees</u>													
11/2/2020	David Marks	Receipt and review of Life Enrichment job description .10	\$950.00	0.1	\$95.00								
11/2/2020	David Marks	Email same to Attorney Thornton and B. Peters .10	\$950.00	0.1	\$95.00								
11/2/2020	Diane Asher	Conference with Attorney Marks re: Sunrise billing	\$85.00	0.1	\$8.50								
11/2/2020	Jim Thornton	GoToMeeting with Blake Peters and Dr. Jones regarding QA process 1.5	\$500.00	1.5	\$750.00								
11/2/2020	Jim Thornton	Calls and GoToMeeting with Blake Peters regarding QA process .5	\$500.00	0.5	\$250.00								
11/2/2020	Jim Thornton	GoToMeeting with David Marks and Dr. Flores regarding RealPage 1.1	\$500.00	1.1	\$550.00								
11/2/2020	Jim Thornton	Calls from David Marks regarding Sunrise service code key and meeting with Dr. Kennedy .4	\$500.00	0.4	\$200.00								
11/2/2020	Jim Thornton	Telephone call with David Marks regarding Dr. Jones' and "encoding" the assessment data .3	\$500.00	0.3	\$150.00								
11/3/2020	David Marks	Receipt and review Attorney Umpierre's revised 30(b)(6) depo notice/subpoena to Watermark .10	\$950.00	0.1	\$95.00								
11/3/2020	David Marks	Receipt and review Attorney Umpierre's email regarding motion to compel task time interpretation prior to depositions .10	\$950.00	0.1	\$95.00								
11/3/2020	David Marks	Compose email to CA Team transmitting Ward transcript and report on status for Crandall .10	\$950.00	0.1	\$95.00								
11/3/2020	David Marks	Contact court reporter regarding status of Crandall depo transcript .10	\$950.00	0.1	\$95.00								
11/3/2020	David Marks	GoToMeeting with Attorney Thornton and B. Peters regarding target vs. actual staffing variations in staffing analysis pre-Ward depo and post-Ward depo 2.3	\$950.00	2.3	\$2,185.00								
11/3/2020	David Marks	Prep for Dr. Kennedy call .3	\$950.00	0.3	\$285.00								
11/3/2020	David Marks	GoToMeeting with Attorneys Healey, Thornton, Dr. Kennedy and B. Peters regarding reply due date and related matters 1.60	\$950.00	1.6	\$1,520.00								
11/3/2020	David Marks	Teleconference with Dr. Cristina Flores regarding RealPage .30	\$950.00	0.3	\$285.00								
11/3/2020	David Marks	Additional teleconference with Dr. Cristina Flores regarding possible exception to licensure application for RealPage .10	\$950.00	0.1	\$95.00								
11/3/2020	David Marks	Teleconference with Attorney Thornton regarding status of Sunrise assessment and task time basis for single math analysis sent .4	\$950.00	0.4	\$380.00								
11/3/2020	David Marks	Attempted teleconference and left message for Paul Gold regarding expert reliance on confidential information .10	\$950.00	0.1	\$95.00								
11/3/2020	Jim Thornton	Created folder of data for Kennedy review .4	\$500.00	0.4	\$200.00								
11/3/2020	Jim Thornton	GoToMeeting w/Blake Peters, David Marks in prep for Kennedy meeting 2.6	\$500.00	2.6	\$1,300.00								
11/3/2020	Jim Thornton	GoToMeeting with Dr. Kennedy, Linsay Petite, David Marks, Chris Healey, Blake Peters 1.6	\$500.00	1.6	\$800.00								
11/3/2020	Jim Thornton	Call w/Chris Healey regarding permutations and timing of 3134 point system and various to-dos .7	\$500.00	0.7	\$350.00								
11/3/2020	Jim Thornton	Call with David Marks regarding meeting with Kennedy and RealPage agreement .4	\$500.00	0.4	\$200.00								
11/3/2020	Jim Thornton	Received and reviewed RealPage agreement and highlighted key provisions .4	\$500.00	0.4	\$200.00								
11/3/2020	Jim Thornton	Research regarding protective orders and knowledge of confidential information .6	\$500.00	0.6	\$300.00								
11/3/2020	Jim Thornton	Began email to David Marks regarding protective orders .3	\$500.00	0.3	\$150.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
11/4/2020	Jacques Balette	T/C with Attorney Marks re: RealPage and Dr. Flores, discuss licensure scope and conditions	\$750.00	0.2	\$150.00								
11/4/2020	David Marks	Teleconference with Attorney Balette regarding RealPage purchase by Dr. Cristina Flores and review and discuss RealPage licensure conditions [.20]	\$950.00	0.2	\$190.00								
11/4/2020	David Marks	Teleconference with Attorney Thornton regarding status of service code key and purchase of RealPage - licensure restrictions [.40]	\$950.00	0.4	\$380.00								
11/4/2020	David Marks	Teleconference with Attorney Thornton, Flores, and Mike Perry regarding licensure restrictions for purchase of RealPage, Flores to obtain "controlling documents" and reference same, RealPage's sales pitch that it shows "how much time" is required for residents [.70]	\$950.00	0.7	\$665.00								
11/4/2020	Jim Thornton	Finished email regarding RealPage agreement and sent to David Marks [.4]	\$500.00	0.4	\$200.00								
11/4/2020	Jim Thornton	Calls with Blake Peters regarding data to send to Dr. Kennedy [.3]	\$500.00	0.3	\$150.00								
11/4/2020	Jim Thornton	Telephone call with David Marks regarding status of service code key and purchase of RealPage - licensure restrictions [.4]	\$500.00	0.4	\$200.00								
11/4/2020	Jim Thornton	Call with Mike Perry regarding RealPage software agreement [.3]	\$500.00	0.3	\$150.00								
11/4/2020	Jim Thornton	Call with Mike Perry, David Marks and Dr. Cristina Flores regarding plan related to RealPage data [.7]	\$500.00	0.7	\$350.00								
11/4/2020	Jim Thornton	Emails to David Marks related to Kennedy analyses [.3]	\$500.00	0.3	\$150.00								
11/4/2020	Jim Thornton	Work on service code key encoding project and sent unique rows with additional codes to Blake Peters [.8]	\$500.00	0.8	\$400.00								
11/5/2020	David Marks	GoToMeeting with Attorney Thornton and B. Peters re: service codes and encoding 1.30	\$950.00	1.3	\$1,235.00								
11/5/2020	David Marks	Teleconference with Attorney Thornton and B. Peters regarding Sunrise workload problem - Sunrise failed to produce all assessments [.30]	\$950.00	0.3	\$285.00								
11/5/2020	David Marks	Review Sali v. Corona regarding possible motion to strike Crandall opinion, and review Crandall depo notes 1.40	\$950.00	1.4	\$1,330.00								
11/5/2020	David Marks	Receipt and partial review of Crandall depo 70 with annotations 1.50	\$950.00	1.5	\$1,425.00								
11/5/2020	David Marks	Teleconference with Paul Gold regarding evidentiary issue 1.30	\$950.00	1.3	\$1,235.00								
11/5/2020	David Marks	Continue review and annotations of Crandall depo [.70]	\$950.00	0.7	\$665.00								
11/5/2020	David Marks	Teleconference with Attorney C. Healey regarding reply brief and discovery issues [.30]	\$950.00	0.3	\$285.00								
11/5/2020	Jim Thornton	Continued work on analysis of service codes and assessment data 2.3	\$500.00	2.3	\$1,150.00								
11/5/2020	Jim Thornton	GoToMeeting w/ David Marks and Blake Peters regarding service codes and encoding 1.3	\$500.00	1.3	\$650.00								
11/5/2020	Jim Thornton	GoToMeeting with Blake Peters regarding data questions [.3]	\$500.00	0.3	\$150.00								
11/5/2020	Jim Thornton	Telephone call with David Marks and Blake Peters regarding Sunrise workload problem - Sunrise failed to produce all assessments [.3]	\$500.00	0.3	\$150.00								
11/6/2020	David Marks	Teleconference with Attorney Thornton regarding update on Sunrise assessment data analysis [.10]	\$950.00	0.1	\$95.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
11/6/2020	David Marks	Teleconference with Attorney Healey regarding status of Sunrise assessment production problem - missing documents, January 15, 2021 deadline for using same in Dale Schroyer and Dr. Cristina Flores analysis, Attorney Thornton fee, and reply brief 1.00	\$950.00	1	\$950.00								
11/6/2020	David Marks	GoToMeeting with Attorney Thornton regarding problems with Sunrise's production of assessment data for 6 sample facilities 1.10	\$950.00	1.1	\$1,045.00								
11/6/2020	Jim Thornton	Telephone call with David Marks regarding update on Sunrise assessment data analysis .1	\$500.00	0.1	\$50.00								
11/6/2020	Jim Thornton	Work on analysis related to incomplete production and sent same to David Marks and Blake Peters 1.6	\$500.00	1.6	\$800.00								
11/6/2020	Jim Thornton	GoToMeeting w/ Blake Peters regarding assessment data issues .4	\$500.00	0.4	\$200.00								
11/6/2020	Jim Thornton	GoToMeeting w/David Marks Sunrise's production of assessment data for 6 sample facilities 1.1	\$500.00	1.1	\$550.00								
11/9/2020	David Marks	Pull documents and create notebook for Sunrise mediation presentation and review same - S. Meachen's graphics, Dr. Cristina Flores Sunrise and Aegis declarations, Aegis motion for certification, Schroyer Aegis declaration, Soojin attack, and Crandall depo outline .90	\$950.00	0.9	\$855.00								
11/9/2020	David Marks	Teleconference with Attorney Thornton regarding missing assessments by resident ID and date, question on whether updated frequency and scoring used in assessment data, and Crandall assertion that Schnelle found 1 CNA could ambulate 7-8 residents at a time is wrong .60	\$950.00	0.6	\$570.00								
11/9/2020	David Marks	Compose email to Dr. Cristina Flores regarding status of RealPage research .10	\$950.00	0.1	\$95.00								
11/9/2020	David Marks	Receipt and review Attorney Healey's draft reply brief for class certification .60	\$950.00	0.6	\$570.00								
11/9/2020	David Marks	Review Judge Guilford's tentative ruling regarding Sunrise production of time studies .30	\$950.00	0.3	\$285.00								
11/9/2020	David Marks	Teleconference with Attorney Thornton regarding updated Sunrise scoring 2014) does not appear to have been used .3	\$950.00	0.3	\$285.00								
11/9/2020	David Marks	Compose email to Attorney Healey to verify the source for the 2014 scoring/Slicta depo and footnote 3 of Sunrise brief opposing certification .2	\$950.00	0.2	\$190.00								
11/9/2020	David Marks	Review multiple emails from Attorney Thornton and B. Peters regarding laundry and bathing original points vs. updated points analysis .80	\$950.00	0.8	\$760.00								
11/9/2020	David Marks	Teleconference with Attorney Thornton regarding analysis of original points vs. updated points and compose email to CA Team with the results 1.1	\$950.00	1.1	\$1,045.00								
11/9/2020	David Marks	Receipt and review emails from Attorneys Healey and Wallace regarding outstanding payments .20	\$950.00	0.2	\$190.00								
11/9/2020	David Marks	Teleconference with Attorney Healey regarding 2014 assessment issue .20	\$950.00	0.2	\$190.00								
11/9/2020	Jim Thornton	Telephone call with David Marks regarding missing assessments by resident ID and date, questions regarding updated frequency and scoring used .6	\$500.00	0.6	\$300.00								
11/9/2020	Jim Thornton	Work on analysis of assessment data for 6 facilities 2.6	\$500.00	2.6	\$1,300.00								

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
							<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	11/9/2020	Jim Thornton	GoToMeetings w/ Blake Peters regarding data .8	\$500.00	0.8	\$400.00								
	11/9/2020	Jim Thornton	GoToMeetings with David Marks regarding analysis of original points versus updated points 1.3	\$500.00	1.3	\$650.00								
	11/9/2020	Jim Thornton	Review of Villanueva Ex 23 .3	\$500.00	0.3	\$150.00								
	11/9/2020	Jim Thornton	Call with David Marks regarding 2014 Sunrise scoring system that may not have been used .2	\$500.00	0.2	\$100.00								
	11/9/2020	Jim Thornton	Email to Chris Healey to verify the source for the 2014 points system .1	\$500.00	0.1	\$50.00								
	11/10/2020	David Marks	Teleconference with Attorney Thornton regarding correct total number of assessments that utilized SUN003134 point system and compose email to CA Team regarding correction .6	\$950.00	0.6	\$570.00								
	11/10/2020	David Marks	GoToMeeting with Attorney Thornton regarding Sunrise failure to produce substantial numbers of assessments, and review of spreadsheet analysis 2.30	\$950.00	2.3	\$2,185.00								
	11/10/2020	David Marks	Teleconference with Attorney Thornton spreadsheet analysis of missing assessments .10	\$950.00	0.1	\$95.00								
	11/10/2020	David Marks	Compose email analysis to CA Team .10	\$950.00	0.1	\$95.00								
	11/10/2020	David Marks	Receipt and review emails from Attorneys Umpierre and Healey regarding spreadsheet of missing assessments .3	\$950.00	0.3	\$285.00								
	11/10/2020	David Marks	Additional telephone call with Attorney Thornton discussing proof refuting Sunrise's defense that multiple points systems are used by facilities .80	\$950.00	0.8	\$760.00								
	11/10/2020	Jim Thornton	Review of numerous Ward and Crandall exhibits 1.3	\$500.00	1.3	\$650.00								
	11/10/2020	Jim Thornton	Work on analysis of census and missing assessment data 1.7	\$500.00	1.7	\$850.00								
	11/10/2020	Jim Thornton	Telephone call with David Marks regarding correct total number of assessments that utilized SUN003134 point system and compose email to California Team regarding correction .6	\$500.00	0.6	\$300.00								
	11/10/2020	Jim Thornton	GoToMeetings w/ David Marks regarding missing assessments and Sunrise point system and variation 2.3	\$500.00	2.3	\$1,150.00								
	11/10/2020	Jim Thornton	Multiple TCs with David Marks regarding Sunrise's defense that multiple points systems are used by facilities and missing data 1.3	\$500.00	1.3	\$650.00								
	11/10/2020	Jim Thornton	Prepared ADL point systems for 6 different scoring system and sent to Blake Peters for further analysis .9	\$500.00	0.9	\$450.00								
	11/11/2020	David Marks	Receipt and review slides recently produced by Attorney Healey 11.10.20 by Sunrise sowing their updated staffing methodology and workload estimate .30	\$950.00	0.3	\$285.00								
	11/11/2020	David Marks	Compose email to CA Team and Attorney Thornton regarding same and initial thoughts .40	\$950.00	0.4	\$380.00								
	11/11/2020	Jim Thornton	Work on analysis of scoring systems with Blake Peters .4	\$500.00	0.4	\$200.00								
	11/11/2020	Jim Thornton	Received and reviewed CLM time studies slides .7	\$500.00	0.7	\$350.00								
	11/11/2020	Jim Thornton	Review of multiple years of Sunrise systems for purposes of analysis .9	\$500.00	0.9	\$450.00								
	11/11/2020	Jim Thornton	Multiple emails regarding Sunrise systems .3	\$500.00	0.3	\$150.00								
	11/11/2020	Jim Thornton	Prepared analysis of SEHA points system in CA and sent to David Marks .8	\$500.00	0.8	\$400.00								
	11/12/2020	David Marks	Receipt and review Attorney Thornton's analysis of 6 possible point system used by Sunrise showing only 1 system universally produces total ADL score .50	\$950.00	0.5	\$475.00								
	11/12/2020	David Marks	GoToMeeting with Attorney Thornton regarding same 2.70	\$950.00	2.7	\$2,565.00								
	11/12/2020	David Marks	Compose email to CA Team explaining findings of analysis .30	\$950.00	0.3	\$285.00								

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						<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
<u>Fees</u>													
11/12/2020	David Marks	Review ACHA summary by Megan of Sunrise control .40	\$950.00	0.4	\$380.00								
11/12/2020	David Marks	Teleconference with Attorney Healey regarding analysis of 6 point systems used by Sunrise and supporting declaration .30	\$950.00	0.3	\$285.00								
11/12/2020	David Marks	Review Sunrise Opposition to Class Certification, Slichta declaration and Attorney Healey's draft reply class brief for Dr. Cristina Flores, staffing and assessment key issues 1.20	\$950.00	1.2	\$1,140.00								
11/12/2020	David Marks	Teleconference with Attorney Thornton to discuss key issues raised in Defendants' opposition to class certification and arguments for Plaintiffs' reply to same 1.0	\$950.00	1	\$950.00								
11/12/2020	Diane Asher	Assist in drafting reply brief for Dr. Cristina Flores	\$85.00	0.7	\$59.50								
11/12/2020	Jim Thornton	Continue work on scoring system analysis .7	\$500.00	0.7	\$350.00								
11/12/2020	Jim Thornton	GoToMeeting w/ David Marks regarding class cert reply and point system used by Sunrise 2.7	\$500.00	2.7	\$1,350.00								
11/12/2020	Jim Thornton	Telephone call with David Marks to discuss key issues raised in Defendants' opposition to class certification 1.0	\$500.00	1	\$500.00								
11/12/2020	Jim Thornton	Compose email to California Team with questions regarding point system .2	\$500.00	0.2	\$100.00								
11/13/2020	David Marks	Review Attorney Thornton and B. Peters' analysis of staffing comparison pre-Sept. 2019 vs. post-Sept. 2019 and permutation analysis .3	\$950.00	0.3	\$285.00								
11/13/2020	David Marks	Telephone call with Attorney Thornton regarding permutations analysis and To Do list for reply brief 1.5	\$950.00	1.5	\$1,425.00								
11/13/2020	David Marks	Teleconference with Attorneys Wallace, Healey, and Thornton regarding reply brief To Do list .40	\$950.00	0.4	\$380.00								
11/13/2020	David Marks	Review workload studies from different LTC environments for Daubert challenge to Dr. Flores 1.4	\$950.00	1.4	\$1,330.00								
11/13/2020	David Marks	Compose email to Attorneys Healey and Wallace regarding same for Daubert challenge to Flores .2	\$950.00	0.2	\$190.00								
11/13/2020	Jim Thornton	Work on permutations analysis based on 2017 and 2018 scoring systems and sent to David Marks 2.7	\$500.00	2.7	\$1,350.00								
11/13/2020	Jim Thornton	Telephone call with David Marks regarding permutations analysis and To Do list for reply brief 1.5	\$500.00	1.5	\$750.00								
11/13/2020	Jim Thornton	Telephone call with Guy Wallace, Chris Healey, and David Marks regarding reply brief To Do list .4	\$500.00	0.4	\$200.00								
11/16/2020	David Marks	Teleconference with Attorney Thornton regarding reply brief - permutation = "test" and regarding outline for key Dr. Cristina Flores reply points 1.10	\$950.00	1.1	\$1,045.00								
11/16/2020	David Marks	Review of 1) Defendants' opposition brief, 2) Healey's draft reply brief with placeholders for me and Attorney Thornton to address, and 3) To Do list re: same 1.2	\$950.00	1.2	\$1,140.00								
11/16/2020	David Marks	Begin draft of our section of reply 1.1	\$950.00	1.1	\$1,045.00								
11/16/2020	David Marks	Receipt and review of Attorney Thornton's analysis of assessment data (occurrence of point changes for specific services) .30	\$950.00	0.3	\$285.00								
11/16/2020	David Marks	Teleconference to B. Peters regarding percent of care managers + med managers, and list of job titles not produced by Sunrise .20	\$950.00	0.2	\$190.00								
11/16/2020	David Marks	Continue drafting reply brief sections 2.7	\$950.00	2.7	\$2,565.00								
11/16/2020	David Marks	Call to Attorney Healey regarding staffing ADLs, organization of reply, and no staffing records for housekeeping, dietary, etc. .2	\$950.00	0.2	\$190.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
11/16/2020	David Marks	Teleconference with Attorney Thornton regarding edit/draft of reply to opposition 2.00	\$950.00	2	\$1,900.00								
11/16/2020	Diane Asher	Assist Attorney Marks in drafting Reply brief for Dr. Cristina Flores	\$85.00	2	\$170.00								
11/16/2020	Jim Thornton	Work on reply and Flores Dec 4.9	\$500.00	4.9	\$2,450.00								
11/16/2020	Jim Thornton	GoToMeetings and telephone calls with David Marks regarding draft of reply to opposition 3.1	\$500.00	3.1	\$1,550.00								
11/17/2020	David Marks	GoToMeeting with Attorney Thornton regarding independent edit/draft of reply to class opposition 5.40	\$950.00	5.4	\$5,130.00								
11/17/2020	David Marks	Continued edit/draft of reply to class opposition 2.2	\$950.00	2.2	\$2,090.00								
11/17/2020	David Marks	Additional GoToMeeting with Attorney Thornton regarding continued edits/draft of reply to class opposition 1.90	\$950.00	1.9	\$1,805.00								
11/17/2020	Diane Asher	Continue with assisting Attorney Marks on Reply Brief	\$85.00	1.6	\$136.00								
11/17/2020	Jim Thornton	Work on reply to opposition to class cert motion on GoToMeeting and in calls with David Marks 9.5	\$500.00	9.5	\$4,750.00	9.5	\$4,750.00						
11/18/2020	David Marks	Teleconference with Attorney Thornton regarding continued review, draft and edits of draft reply to Sunrise's opposition 8.70	\$950.00	8.7	\$8,265.00	8.7	\$8,265.00						
11/18/2020	David Marks	Teleconference with Attorneys Healey, Wallace and Thornton regarding status of reply to Sunrise opposition 0.80	\$950.00	0.8	\$760.00								
11/18/2020	David Marks	Edit revisions to class reply draft .60	\$950.00	0.6	\$570.00								
11/18/2020	Diane Asher	Assist with revisions to class reply brief	\$85.00	0.6	\$51.00								
11/18/2020	Jim Thornton	Work on reply to class cert motion on GoToMeetings with David Marks 8.7	\$500.00	7.6	\$3,800.00	7.6	\$3,800.00						
11/18/2020	Jim Thornton	Calls w/David Marks regarding reply to class cert motion 1.1	\$500.00	1.1	\$550.00								
11/19/2020	David Marks	GoToMeeting with Attorney Thornton regarding draft/edits of reply to opposition 6.1	\$950.00	6.1	\$5,795.00	6.1	\$5,795.00						
11/19/2020	David Marks	Re-review Dr. Cristina Flores' depo for key reply points (pp. 200-235) .2	\$950.00	0.2	\$190.00								
11/19/2020	David Marks	Teleconference with Attorney Healey regarding status of reply .50	\$950.00	0.5	\$475.00								
11/19/2020	David Marks	Additional GoToMeeting with Attorney Thornton to continue edits to reply to opposition 2.9	\$950.00	2.9	\$2,755.00								
11/19/2020	David Marks	Compose email to Attorneys Healey and Wallace regarding latest draft .3	\$950.00	0.3	\$285.00								
11/19/2020	Diane Asher	Work with Attorney Marks re: class reply brief	\$85.00	6	\$510.00	6	\$510.00						
11/19/2020	Jim Thornton	GoToMeeting with David Marks regarding work on reply and Flores section--key points 9.1	\$500.00	9.1	\$4,550.00	9.1	\$4,550.00						
11/19/2020	Jim Thornton	Calls w/David Marks regarding reply brief key points .4	\$500.00	0.4	\$200.00								
11/20/2020	David Marks	GoToMeeting with Attorney Thornton to review, edit/draft new section to reply brief and compose email to Attorneys Healey and Wallace transmitting same 3.7	\$950.00	3.7	\$3,515.00								
11/20/2020	David Marks	Additional GoToMeeting with Attorney Thornton to review, edit/draft reply brief, and draft of Dr. Cristina Flores supplemental declaration 1.60	\$950.00	1.6	\$1,520.00								
11/20/2020	Jim Thornton	GoToMeeting w/David Marks regarding reply to class cert motion and Flores sections --key issues 5.3	\$500.00	5.3	\$2,650.00								
11/20/2020	Jim Thornton	Emails to California team related to Flores/reply issues .2	\$500.00	0.2	\$100.00								
11/20/2020	Jim Thornton	W/on Overview of arguments and defects section .8	\$500.00	0.8	\$400.00								
11/21/2020	Jim Thornton	Work on Flores dec .7	\$500.00	0.7	\$350.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>	<u>Fees</u>		<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
							<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
							<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
11/22/2020	David Marks	Receipt and review emails from Attorney Healey regarding Dr. Cristina Flores supplemental declaration and edits to reply to Defendants' opposition .10	\$950.00	0.1	\$95.00									
11/22/2020	David Marks	Teleconference with Attorney Thornton regarding same 2.30	\$950.00	2.3	\$2,185.00									
11/22/2020	Jim Thornton	Work on Flores dec .7	\$500.00	0.7	\$350.00									
11/22/2020	Jim Thornton	Telephone calls and GoToMeeting with David Marks regarding Flores dec 2.3	\$500.00	2.3	\$1,150.00									
11/23/2020	David Marks	GoToMeeting with Attorney Thornton to review and discuss edits to Dr. Cristina Flores and Dr. Kennedy supplemental declarations and reply to class cert motion 3.8 "	\$950.00	3.8	\$3,610.00									
11/23/2020	Jim Thornton	GoToMeeting w/Blake Peters regarding data question .2	\$500.00	0.2	\$100.00									
11/23/2020	Jim Thornton	GoToMeeting w/ David Marks and Dr. Cristina Flores regarding dec and reply to class cert motion 3.8	\$500.00	3.8	\$1,900.00									
11/23/2020	Jim Thornton	Work on Flores dec and reply to cert 1.8	\$500.00	1.8	\$900.00									
11/24/2020	Jim Thornton	Work on reply and Flores dec 4.6	\$500.00	4.6	\$2,300.00									
12/1/2020	Jim Thornton	Work on service code key .8	\$500.00	0.8	\$400.00									
12/2/2020	David Marks	GoToMeeting with Attorney Thornton regarding review of Sunrise mediation brief and edits to same .9	\$950.00	1	\$950.00									
12/2/2020	Jim Thornton	Call and GoToMeeting w/David Marks regarding mediation brief 1.0	\$500.00	1.0	\$500.00									
12/2/2020	Jim Thornton	GoToMeeting w/Blake Peters regarding service code key .4	\$500.00	0.4	\$200.00									
12/3/2020	David Marks	Receipt and review final mediation brief for edit acceptance by me and Attorney Thornton .40	\$950.00	0.4	\$380.00									
12/3/2020	David Marks	Prep for mediation presentation .80	\$950.00	0.8	\$760.00									
12/3/2020	David Marks	Teleconference with CA Team regarding mediation 1.30	\$950.00	1.3	\$1,235.00				1.3	1235				
12/4/2020	David Marks	Review deterministic analysis based on task times from confidential case and extrapolation due to missing assessments .40	\$950.00	0.4	\$380.00									
12/4/2020	David Marks	Teleconference with Attorney Thornton regarding same and edit column headings 1.00	\$950.00	1	\$950.00									
12/4/2020	Sterling Meachen	Presentation Deck – compiled the entire presentation using Adobe Acrobat and consulted with Marks to make sure presentation was ready for mediation	\$225.00	5.9	\$1,327.50									
12/4/2020	Jim Thornton	Review of rough deterministic analysis .8	\$500.00	0.8	\$400.00									
12/4/2020	Jim Thornton	Continued work on service code key 4.5	\$500.00	4.5	\$2,250.00									
12/4/2020	Jim Thornton	Call with David Marks regarding deterministic analysis and extrapolations and edited column headings 1.0	\$500.00	1	\$500.00									
12/6/2020	David Marks	GoToMeeting with Attorney J. Thornton regarding Sunrise point system and additional revision to Plaintiff's Answering Brief (2.70)	\$950.00	2.7	\$2,565.00									
12/7/2020	David Marks	Receipt and review multiple emails and memo from Attorney Healey regarding mediation points .80	\$950.00	0.8	\$760.00									
12/7/2020	David Marks	Teleconference with Attorney Thornton to discuss mediation To Do list 1.20	\$950.00	1.2	\$1,140.00									
12/7/2020	David Marks	Revise mediation slides for Sunrise (i.e., ProModel slides) 1.80	\$950.00	1.8	\$1,710.00									
12/7/2020	David Marks	Teleconference with Attorney Thornton regarding comparison of Sunrise staffing and required care time to other ALF chain staffing and required time .30	\$950.00	0.3	\$285.00									
12/7/2020	David Marks	GoToMeeting with S. Meachen regarding revision of Sunrise slides 1.70	\$950.00	1.7	\$1,615.00									
12/7/2020	David Marks	Review and revise Sunrise slides 1.00	\$950.00	1	\$950.00									

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
12/7/2020	David Marks	Review preliminary results comparing Sunrise staffing to another ALF chain in CA [.20]	\$950.00	0.2	\$190.00								
12/7/2020	David Marks	Teleconference with Attorney Thornton to discuss same [.20]	\$950.00	0.2	\$190.00								
12/7/2020	David Marks	Teleconference with Attorney Healey regarding preliminary staffing results [.20]	\$950.00	0.2	\$190.00								
12/7/2020	Sterling Meachen	Meeting with Marks to revise Sunrise slides	\$225.00	1.7	\$382.50								
12/7/2020	Jim Thornton	Continued work on simple math analyses [2.8]	\$500.00	2.8	\$1,400.00								
12/7/2020	Jim Thornton	Call with David Marks regarding mediation and various tasks needed [1.2]	\$500.00	1.2	\$600.00								
12/7/2020	Jim Thornton	Call with David Marks regarding comparison of Sunrise staffing and required care time to other ALF chain staffing and required time [.3]	\$500.00	0.3	\$150.00								
12/7/2020	Jim Thornton	Call with David Marks regarding to mediation slides [.2]	\$500.00	0.2	\$100.00								
12/8/2020	David Marks	GoToMeeting with Attorney Thornton to discuss prep for mediation and quality assurance check of global expert inputs spreadsheet [1.4]	\$950.00	1.4	\$1,330.00								
12/8/2020	David Marks	Telephone call with S. Meachen regarding slide edits for mediation [.2]	\$950.00	0.2	\$190.00								
12/8/2020	David Marks	Teleconferences with Attorney Thornton and S. Meachen to continue edit of mediation slides [1.40]	\$950.00	1.4	\$1,330.00								
12/8/2020	David Marks	Teleconference with Attorney C. Healey regarding mediation slides [.20]	\$950.00	0.2	\$190.00								
12/8/2020	Sterling Meachen	Confer with Marks about Sunrise slides	\$225.00	0.2	\$45.00								
12/8/2020	Jim Thornton	GoToMeeting w/David Marks and Sterling Meachen regarding prep for mediation [1.4]	\$500.00	1.4	\$700.00								
12/9/2020	David Marks	Review Attorney Healey's edits to mediation slides [.10]	\$950.00	0.1	\$95.00								
12/9/2020	David Marks	GoToMeeting with Attorney Thornton regarding mediation prep [1.50]	\$950.00	1.5	\$1,425.00								
12/9/2020	David Marks	Teleconferences with Attorney Healey regarding Dr. Cristina Flores [.20]	\$950.00	0.2	\$190.00								
12/9/2020	David Marks	Compose email to Greg Westerman regarding loading of mediation slides on Zoom [.10]	\$950.00	0.1	\$95.00								
12/9/2020	David Marks	Compose email to Attorney Healey regarding Dr. Cristina Flores depo - residents at risk [.10]	\$950.00	0.1	\$95.00								
12/9/2020	David Marks	Teleconferences with Attorney Thornton to discuss call regarding Dr. Flores testimony that counters Sunrise defense [.70]	\$950.00	0.7	\$665.00								
12/9/2020	David Marks	Teleconferences with Attorney Healey regarding mediation strategy [.30]	\$950.00	0.3	\$285.00								
12/9/2020	David Marks	Attend mediation via Zoom [3.20]	\$950.00	3.2	\$3,040.00								
12/9/2020	Sterling Meachen	Simulation Mediation – presentation was used via online meeting.	\$225.00	3.1	\$697.50								
12/9/2020	Jim Thornton	GoToMeeting w/David Marks regarding prep for mediation [1.5]	\$500.00	1.5	\$750.00								
12/9/2020	Jim Thornton	Work on analysis of Sunrise staffing compared to other chains [1.7]	\$500.00	1.7	\$850.00								
12/9/2020	Jim Thornton	Calls with David Marks regarding Flores depo [.7]	\$500.00	0.7	\$350.00								
12/10/2020	David Marks	Teleconferences with Attorney Healey regarding settlement status [.20]	\$950.00	0.2	\$190.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
12/10/2020	Sterling Meachen	Revisit the slides from the Simulation Mediation, make tweaks and notes from the presentation – outputted via email with firm watermark	\$225.00	3.5	\$787.50								
12/11/2020	Sterling Meachen	Created slides for Task Quantity section based upon data	\$225.00	3.5	\$787.50								
12/14/2020	David Marks	Administrative teleconference with Clayton Cain regarding update on expert expenses - paid/unpaid [.10]	\$950.00	0.1	\$95.00								
12/14/2020	David Marks	Receipt and review Attorney Umpierre's meet and confer email and Gibson letter regarding discovery of task time/budget variance [.20]	\$950.00	0.2	\$190.00								
12/14/2020	David Marks	Receipt and review email from Attorney Healey regarding upcoming status conference, and forward same to Attorney Thornton [.20]	\$950.00	0.2	\$190.00								
12/14/2020	David Marks	GoToMeeting with Attorney Thornton regarding Sunrise's defense advanced during mediation [.9]	\$950.00	0.9	\$855.00								
12/14/2020	David Marks	Prep for call with CA team regarding next steps post mediation [.3]	\$950.00	0.3	\$285.00								
12/14/2020	David Marks	Teleconference with CA Team regarding mediation status/post mortem, and discovery issues [1.50]	\$950.00	1.5	\$1,425.00			1.5	1425				
12/14/2020	Jim Thornton	Work with David Marks on GoToMeeting regarding risk posed to residents [.9]	\$500.00	0.9	\$450.00								
12/14/2020	Jim Thornton	Prepared and sent comparison of Sunrise task times to Flores' Table 3 [1.2]	\$500.00	1.2	\$600.00								
12/14/2020	Jim Thornton	Detailed review of SUN00106579-84 [.8]	\$500.00	0.8	\$400.00								
12/15/2020	David Marks	Review/approve letter to Gorman regarding Watermark task times [.10]	\$950.00	0.1	\$95.00								
12/15/2020	David Marks	Receipt and review emails from Attorney Healey regarding MTS opposition status and Attorney Umpierre's meet and confer meeting today [.20]	\$950.00	0.2	\$190.00								
12/15/2020	David Marks	Receipt and review email from Attorney Healey regarding Sunrise task time studies (insert into MTS opposition) [.10]	\$950.00	0.1	\$95.00								
12/15/2020	David Marks	Receipt and review MTC order in preparation for meet and confer with Gibson today, including issues regarding care labor management staffing formula and Defendants' suggested formula related to "software code" (leading to staffing in CLM) [.4]	\$950.00	0.4	\$380.00								
12/15/2020	David Marks	Telephone call with Attorney Thornton regarding software code [.2]	\$950.00	0.2	\$190.00								
12/15/2020	David Marks	Receipt and review email from Attorney Umpierre regarding Sunrise's response to missing assessments [.10]	\$950.00	0.1	\$95.00								
12/15/2020	David Marks	Compose email to CA Team regarding missing pre-designated timeframe assessments needed [.40]	\$950.00	0.4	\$380.00								
12/15/2020	David Marks	Receipt and review Attorney Healey's draft jury charge/instructions [.50]	\$950.00	0.5	\$475.00								
12/15/2020	David Marks	Receipt and review email from Attorney Umpierre with Ashley Allyn's explanation of payroll discrepancy [.20]	\$950.00	0.2	\$190.00								
12/15/2020	David Marks	Compose email to Attorney Thornton and B. Peters to discuss [.10]	\$950.00	0.1	\$95.00								
12/15/2020	David Marks	Receipt and review Gorman's email regarding meet and confer dates/times for CLM software discussion [.10]	\$950.00	0.1	\$95.00								
12/15/2020	David Marks	Receipt and review follow-up email from Attorney Umpierre to Gibson regarding failure to produce all assessments [.10]	\$950.00	0.1	\$95.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/15/2020	Sterling Meachen	Used data given by ProModel to create custom excel and slides detailing their California Product Users	\$225.00	3.4	\$765.00								
12/15/2020	Jim Thornton	Brief review of recommendation of Special Master regarding MTC .2	\$500.00	0.2	\$100.00								
12/15/2020	Jim Thornton	Call with David Marks about formula for staffing (.2)	\$500.00	0.2	\$100.00								
12/16/2020	David Marks	Receipt and review of emails from Attorneys Healey and Umpierre regarding links to documents relating to Sunrise task time studies (Attorney Umpierre located 100) .40	\$950.00	0.4	\$380.00								
12/16/2020	David Marks	Receipt and review memo from Attorney Thornton regarding CLM staffing formula in preparation for today's call .10	\$950.00	0.1	\$95.00								
12/16/2020	David Marks	Teleconference with Attorney Thornton to discuss same .50	\$950.00	0.5	\$475.00								
12/16/2020	David Marks	Teleconference with Attorneys Allyn, Gorman, Johnson, and Thornton regarding CLM staffing formula .50	\$950.00	0.5	\$475.00								
12/16/2020	David Marks	Teleconference with Attorney Thornton regarding Sunrise conference call regarding CLM software .10	\$950.00	0.1	\$95.00								
12/16/2020	David Marks	Teleconference with Attorney Healey regarding Sunrise task time project (docs produced by Defendant) .40	\$950.00	0.4	\$380.00								
12/16/2020	David Marks	Receipt and review Attorney Healey's proposed jury instructions .70	\$950.00	0.7	\$665.00								
12/16/2020	David Marks	Review update regarding mediator's request .10	\$950.00	0.1	\$95.00								
12/16/2020	David Marks	Review plan of action To Do list for depo of Lacey .10	\$950.00	0.1	\$95.00								
12/16/2020	Sterling Meachen	The findings from the users was used to create custom slide detail how these company use simulation technology	\$225.00	5.4	\$1,215.00								
12/16/2020	Jim Thornton	Call with David Marks regarding CLM staffing formula .5	\$500.00	0.5	\$250.00								
12/16/2020	Jim Thornton	Call with David Marks, Mark Johnson, and defense counsel regarding CLM staffing formula .5	\$500.00	0.5	\$250.00								
12/16/2020	Jim Thornton	Call with David Marks setting up conference call regarding CLM software .1	\$500.00	0.1	\$50.00								
12/19/2020	David Marks	Review and respond to Attorney Healey's question regarding MTS Schroyer declaration pertaining to travel time, and Sunrise data reviewed by Schroyer and opinion regarding same 1.30	\$950.00	1.3	\$1,235.00								
12/19/2020	Jim Thornton	Work with David Marks regarding Plaintiffs' Opposition to MTS Schroyer, pulling quotes from dec and depo and preparing email 1.2	\$500.00	1.2	\$600.00								
12/22/2020	Sterling Meachen	Detailed a step-by-step illustration of the Analytic Technology process	\$225.00	4.5	\$1,012.50								
12/22/2020	Jim Thornton	Review of roughly 100 task time files received and prepared combined file of same 3.6	\$500.00	3.6	\$1,800.00								
12/22/2020	Jim Thornton	Prepared and sent David Marks summary of review .4	\$500.00	0.4	\$200.00								
12/22/2020	Jim Thornton	Emails with Diane Asher and Tracy Myrick regarding file access .3	\$500.00	0.3	\$150.00								
12/23/2020	Sterling Meachen	Excel spreadsheet data from specific homes was used to graph values and compared based on their Minimum vs. Required workloads	\$225.00	4.3	\$967.50								
12/28/2020	David Marks	Teleconference with Attorney Thornton regarding same 1.80	\$950.00	1.8	\$1,710.00								
12/28/2020	David Marks	Review Attorney Umpierre's key slides and Sunrise task time documents (Sunrise 12/11 production) 1.50	\$950.00	1.5	\$1,425.00								
12/28/2020	David Marks	Review and edit draft opposition to strike Flores declaration by Attorney Healey 1.00	\$950.00	1	\$950.00								
12/28/2020	Sterling Meachen	Findings based upon the percent of workers required per tasks used to create worker presentation section	\$225.00	2.1	\$472.50								

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
					<u>Worked</u>	<u>Fees</u>	<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>		
	12/28/2020	Jim Thornton	Received and reviewed various TCB documents .4	\$500.00	0.4		\$200.00									
	12/28/2020	Jim Thornton	Sent David Marks email with bar chart that confirms presence of staffing issue .3	\$500.00	0.3		\$150.00									
	12/28/2020	Jim Thornton	Work on the opposition to Flores and sent language to David Marks 1.1	\$500.00	1.1		\$550.00									
	12/28/2020	Jim Thornton	Calls with David Marks regarding opp to MTS Flores .8	\$500.00	0.8		\$400.00									
	12/28/2020	Jim Thornton	Email to Sterling Meachen regarding bar chart .2	\$500.00	0.2		\$100.00									
	12/29/2020	David Marks	Work on Defendant's motion to strike Dr. Cristina Flores reviewing for: 1 key points, 2 Attorney Healey's proposed draft for structure/key points, 3 Sunrise's 12/11 production of task time info/PowerPoints, and 4 Sunrise motion to strike Flores 2.60	\$950.00	2.6		\$2,470.00									
	12/29/2020	David Marks	Review Sunrise witness Lacey background qualification regarding staffing and investigation .30	\$950.00	0.3		\$285.00									
	12/29/2020	David Marks	Review motion to strike Schroyer declaration (Attorney Healey's draft) .20	\$950.00	0.2		\$190.00									
	12/29/2020	David Marks	Review 9.7.17 email and PowerPoint from Lacey which includes a presentation by Dr. Sandra Simmons 1.5	\$950.00	1.5		\$1,425.00									
	12/29/2020	David Marks	Compose email to CA Team regarding significance (relevant to motion to strike) .2	\$950.00	0.2		\$190.00									
	12/29/2020	David Marks	Review PowerPoint attached to Lacey email of 9.7.17 .30	\$950.00	0.3		\$285.00									
	12/29/2020	David Marks	Receipt and review of email from Attorney Healey enclosing Sunrise attachment regarding task time 12.12.19 Belfonte email .20	\$950.00	0.2		\$190.00									
	12/29/2020	David Marks	Receipt and review email from Attorney Umpire attaching 12.11.20 Sunrise production (SUN email 111041) regarding assessment "data dump" .30	\$950.00	0.3		\$285.00									
	12/29/2020	David Marks	Teleconference with Attorney Thornton regarding Sunrise TCB documents, key points, and Sunrise claims about same 1.30	\$950.00	1.3		\$1,235.00									
	12/29/2020	Sterling Meachen	Tracked and graphed Care Manager data over period of class period and put into a slide	\$225.00	5.5		\$1,237.50									
	12/29/2020	Jim Thornton	Received and reviewed multiple Sunrise documents related to the TCB project 1.4	\$500.00	1.4		\$700.00									
	12/29/2020	Jim Thornton	Email to David Marks regarding Sandra Simmons PowerPoint and Lacey email .2	\$500.00	0.2		\$100.00									
	12/29/2020	Jim Thornton	Calls with David Marks regarding TCB documents 1.4	\$500.00	1.4		\$700.00									
	12/29/2020	Jim Thornton	Call with Blake Peters .2	\$500.00	0.2		\$100.00									
	12/30/2020	David Marks	Teleconference with Attorney Thornton regarding pulling key documents for Lacey depo relevant to Dr. Cristina Flores task times .30	\$950.00	0.3		\$285.00									
	12/30/2020	David Marks	Review key documents pulled and define subjects needed for depo .80	\$950.00	0.8		\$760.00									
	12/30/2020	Jim Thornton	Work on depo prep for Ann Lacey 1.3	\$500.00	1.3		\$650.00									
	12/30/2020	Jim Thornton	Call from David Marks regarding depo prep for Lacey .3	\$500.00	0.3		\$150.00									
	12/30/2020	Jim Thornton	Resent comparison of Sunrise task times to Flores' Table 3 .1	\$500.00	0.1		\$50.00									
	12/30/2020	Jim Thornton	Research regarding Argentum and sent to David Marks .3	\$500.00	0.3		\$150.00									
	12/31/2020	David Marks	Review Sunrise MTS Dr. Cristina Flores for key arguments and compare to arguments addressed in Attorney Healey's draft opposition to MTS, and redraft introduction to opposition .80	\$950.00	0.8		\$760.00									
	12/31/2020	David Marks	GoToMeeting with Attorney Thornton to discuss same 1.30	\$950.00	1.3		\$1,235.00									

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/31/2020	Diane Asher	Assist Attorney Marks in redrafting introduction to opposition in Sunrise MTS Dr. Cristina Flores	\$85.00	0.6	\$51.00								
12/31/2020	Jim Thornton	GoToMeeting with David Marks regarding opp to MTS Flores and intro section 1.3	\$500.00	1.3	\$650.00								
1/4/2021	David Marks	Receipt and review Sunrise PowerPoint (SUN011524) and request for production .60	\$950.00	0.6	\$570.00								
1/4/2021	David Marks	Prepare for Lacey depo, including review of PowerPoint documents SUN0111009-34, SUN11013, XL spreadsheets from Sunrise 106667-107921) with task time, Lacey 5.12.16 email and attachments, and draft key depo points 4.80	\$950.00	4.8	\$4,560.00								
1/4/2021	David Marks	Teleconference with Attorney Thornton to discuss collapsing Sunrise task time spreadsheets and depo points 1.40	\$950.00	1.4	\$1,330.00								
1/4/2021	David Marks	Review Attorney Thornton's revised draft of MTS opposition of Dr. Cristina Flores, and continue edits 2.70	\$950.00	2.7	\$2,565.00								
1/4/2021	Diane Asher	Assist Attorney Marks re: drafting key points for Lacey depo	\$85.00	4	\$340.00								
1/4/2021	Sterling Meachen	Meeting with Thornton to begin a detailed Floorplan Project to map each individual facility by floor and room.	\$225.00	5.8	\$1,305.00								
1/4/2021	Jim Thornton	Call w/Blake Peters regarding task times .2	\$500.00	0.2	\$100.00								
1/4/2021	Jim Thornton	Email to David Marks w/ language from Sunrise PPT .3	\$500.00	0.3	\$150.00								
1/4/2021	Jim Thornton	Work on response to MTS Flores and sent to David Marks draft 2.8	\$500.00	2.8	\$1,400.00								
1/4/2021	Jim Thornton	Calls with David Marks regarding Sunrise task time studies and response to MTS Flores 1.4	\$500.00	1.4	\$700.00								
1/4/2021	Jim Thornton	Emails to Brian Umpierre regarding gaps in Bates #s and standard deviations .2	\$500.00	0.2	\$100.00								
1/4/2021	Jim Thornton	Email to David Marks regarding interview insights from Sunrise task time study .2	\$500.00	0.2	\$100.00								
1/4/2021	Jim Thornton	Review of task time data and other files .8	\$500.00	0.8	\$400.00								
1/4/2021	Jim Thornton	Resent David Marks a comparison of Sunrise task times to Table 3 .1	\$500.00	0.1	\$50.00								
1/5/2021	David Marks	Teleconference with Dr. John Schnelle regarding Ann Lacey attachment to PowerPoint by Dr. Simmons .50	\$950.00	0.5	\$475.00								
1/5/2021	David Marks	Teleconference with Attorney Thornton regarding digitally creating a floor plan for inputting into simulation (assigned to S. Meachen) .20	\$950.00	0.2	\$190.00								
1/5/2021	David Marks	Teleconference with Attorney Thornton regarding Sunrise production from 12.11.20 .20	\$950.00	0.2	\$190.00								
1/5/2021	David Marks	Receipt and review email from Attorney Umpierre regarding request for missing task time data .80	\$950.00	0.8	\$760.00								
1/5/2021	David Marks	Teleconference with Attorney Thornton to discuss same and edit and compose email to CA Team transmitting edits 1	\$950.00	1	\$950.00								
1/5/2021	David Marks	Receipt and review new PowerPoints sent by Attorney Umpierre - SUN104124 24 pgs) regarding Care Labor Management dated 6.19.19, "non-deferrable time," reason for 4 figures, and "time standards" .50	\$950.00	0.5	\$475.00								
1/5/2021	David Marks	Review Sunrise 3 page PowerPoint with notes from Shaye Grinder .20	\$950.00	0.2	\$190.00								
1/5/2021	David Marks	Continue edits to MTS opposition (as to Dr. Cristina Flores) .90	\$950.00	0.9	\$855.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/5/2021	David Marks	Teleconference with Attorney Thornton to discuss new documents sent by Attorney Umpierre regarding task time protocol, definition and SQL data, and Attorney Umpierre's "Google Sheet" which contains a large spreadsheet identifying key documents with link .40	\$950.00	0.4	\$380.00								
1/5/2021	David Marks	Teleconference with Attorney Thornton to discuss opposition to MTS Flores .90	\$950.00	0.9	\$855.00								
1/5/2021	David Marks	GoToMeeting with Attorney J. Thornton re: discovery issues and Meet and Confer request 1.2	\$950.00	1.2	\$1,140.00								
1/5/2021	David Marks	Compose response email to Attorney Umpierre's 3 emails (dated 1.5.21) about task times, SQL and protocol documents captured in his Google Sheet .80	\$950.00	0.8	\$760.00								
1/5/2021	David Marks	Review email regarding Ann Lacey depo date and issues regarding use of Sunrise task time data/analysis for opposition to MTS Dale Schroyer and Flores .30	\$950.00	0.3	\$285.00								
1/5/2021	Sterling Meachen	Using discovery data illustrated all Alma Loma Floors and drew out rooms and activities areas by color code.	\$225.00	3.4	\$765.00								
1/5/2021	Jim Thornton	Calls and GoToMeeting w/David Marks regarding discovery issues and meet and confer request 1.2	\$500.00	1.2	\$600.00								
1/5/2021	Jim Thornton	Second GoToMeeting w/David Marks regarding response to MTS Flores 1.2	\$500.00	1.2	\$600.00								
1/5/2021	Jim Thornton	Calls with David Marks regarding opp to MTS Flores and new task time data 1.3	\$500.00	1.3	\$650.00								
1/5/2021	Jim Thornton	Call with Sterling Meachen and emails to him related to preparing floor plans for simulation use--reviewing his initial attempts and providing feedback .8	\$500.00	0.8	\$400.00								
1/5/2021	Jim Thornton	Email to Blake Peters regarding by shift staffing analysis .2	\$500.00	0.2	\$100.00								
1/5/2021	Jim Thornton	Began review of docs related to Lacey depo in google sheet and sent David Marks key references 1.5	\$500.00	1.5	\$750.00								
1/5/2021	Jim Thornton	Review of database related Sunrise PPT from Brian Umpierre .3	\$500.00	0.3	\$150.00								
1/5/2021	Jim Thornton	GoToMeetings w/Blake Peters regarding Sunrise task time project 1.2	\$500.00	1.2	\$600.00								
1/5/2021	Jim Thornton	Review and analysis of combined task times from Blake Peters--prepared summary by task 2	\$500.00	2	\$1,000.00								
1/5/2021	Jim Thornton	Emails with Brian Umpierre regarding Table 3 task times .3	\$500.00	0.3	\$150.00								
1/5/2021	Jim Thornton	Review of opp to MTS Flores .3	\$500.00	0.3	\$150.00								
1/6/2021	David Marks	Receipt and review 1.5.21 and 1.6.21 correspondence regarding task time, Lacey depo, and arbitration, and Attorney Thornton draft of Dale Schroyer opposition to MTS .90	\$950.00	0.9	\$855.00								
1/6/2021	David Marks	Receipt and review Dr. John Schnelle and Dr. Sandra Simmons correspondence regarding ALF PowerPoint presentation, and send request for slides .30	\$950.00	0.3	\$285.00								
1/6/2021	David Marks	Receipt and review of correspondence regarding request for telephonic conference with court .10	\$950.00	0.1	\$95.00								
1/6/2021	David Marks	File and organize updated Sunrise slide presentation into binder .10	\$950.00	0.1	\$95.00								
1/6/2021	David Marks	Compose email to Diane Asher regarding same .10	\$950.00	0.1	\$95.00								
1/6/2021	David Marks	Teleconference with Attorney Thornton to discuss edits to Schroyer opposition to MTS and inclusion of Simmons PowerPoint attached to Lacey email 1.30	\$950.00	1.3	\$1,235.00								

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
							<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/6/2021	David Marks	Continue edits of opposition to MTS Schroyer 2.8	\$950.00	2.8	\$2,660.00								
	1/6/2021	Jim Thornton	Work on response to MTS Schroyer and sent David Marks proposed language regarding sim inputs .8	\$500.00	0.8	\$400.00								
	1/6/2021	Jim Thornton	GoToMeeting with David Marks 2.8	\$500.00	2.8	\$1,400.00								
	1/6/2021	Jim Thornton	Phone calls related to response to MTS Schroyer .1	\$500.00	0.1	\$50.00								
	1/6/2021	Jim Thornton	Review of MTS Schroyer and MTS Flores .5	\$500.00	0.5	\$250.00								
	1/6/2021	Jim Thornton	Review of Spann decision and emails to David Marks regarding same [.4]	\$500.00	0.4	\$200.00								
	1/6/2021	Jim Thornton	Emails with Brian Umpierre regarding MTS Schroyer, review of Sunrise Strong emails, PowerPoints and .pdfs, noting key area for Lacey depo and downloading and labeling files for use in depo 2.6	\$500.00	2.6	\$1,300.00								
	1/6/2021	Jim Thornton	Email to David Marks regarding Lacey's acknowledgment that she noticed inconsistencies in the points setup .3	\$500.00	0.3	\$150.00								
	1/6/2021	Jim Thornton	Call with David Marks regarding opposition to MTS Schroyer and Simmons PowerPoint attached to Lacey email 1.3	\$500.00	1.3	\$650.00								
	1/7/2021	David Marks	Review correspondence regarding need for telephonic conference call with court regarding missing discovery .10	\$950.00	0.1	\$95.00								
	1/7/2021	Sterling Meachen	Using discovery data illustrated all Beverly Floors and drew out rooms and activities areas by color code.	\$225.00	4.6	\$1,035.00								
	1/7/2021	Jim Thornton	Multiple emails with SM regarding identifying unlabeled floor plans and other floor plan issues .6	\$500.00	0.6	\$300.00								
	1/7/2021	Jim Thornton	Work on possible inclusion of Simmons PowerPoint within response to MTS Schroyer .3	\$500.00	0.3	\$150.00								
	1/7/2021	Jim Thornton	Received and reviewed emails from team regarding outstanding discovery issues and strategy for obtaining .4	\$500.00	0.4	\$200.00								
	1/8/2021	David Marks	Receipt and review Attorney Umpierre's draft letter to the court regarding Sunrise's failure to produce discovery, and review Attorney Healey's edits to Attorney Umpierre's draft, and identify other discovery missing to discuss with Attorney Thornton .60	\$950.00	0.6	\$570.00								
	1/8/2021	David Marks	Teleconference with Attorney Thornton to discuss Attorney Umpierre's draft letter to court regarding missing discovery .4	\$950.00	0.4	\$380.00								
	1/8/2021	David Marks	Email to CA Team regarding missing discovery .2	\$950.00	0.2	\$190.00								
	1/8/2021	David Marks	Continue review/edits of Dale Schroyer opposition MTS .80	\$950.00	0.8	\$760.00								
	1/8/2021	David Marks	GoToMeeting with Attorney Thornton re: response to MTS Schroyer 6.30	\$950.00	6.3	\$5,985.00	6.3	\$5,985.00						
	1/8/2021	David Marks	Compose email to CA Team regarding clarification of missing assessment is 51% .10	\$950.00	0.1	\$95.00								
	1/8/2021	David Marks	Receipt, review and approve Attorney Umpierre's letter to court regarding missing discovery .10	\$950.00	0.1	\$95.00								
	1/8/2021	David Marks	Compose email to CA Team transmitting final edits to Schroyer opposition to MTS (consisting of changes to Intro, and a FN 2 added) .60	\$950.00	0.6	\$570.00								
	1/8/2021	Sterling Meachen	Using discovery data illustrated all San Mateo and drew out rooms and activities areas by color code.	\$225.00	4.9	\$1,102.50								
	1/8/2021	Jim Thornton	Call and work with David Marks regarding discovery letter to judge .5	\$500.00	0.5	\$250.00								
	1/8/2021	Jim Thornton	Work with David Marks on GoToMeeting regarding response to MTS Schroyer 6.3	\$500.00	6.3	\$3,150.00	6.3	\$3,150.00						

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/11/2021	David Marks	Teleconference with Attorney Thornton to discuss To Do list for Dr. Cristina Flores opposition to MTS [.90]	\$950.00	0.9	\$855.00								
1/11/2021	David Marks	Teleconference with B. Peters regarding staffing FTE in Sunrise sample facilities [.20]	\$950.00	0.2	\$190.00								
1/11/2021	Sterling Meachen	Conferred with Thornton to include doorway in areas of the map where not clearly identifiable [.2]	\$225.00	0.2	\$45.00								
1/11/2021	Sterling Meachen	Reedited previous floorplans [4.4]	\$225.00	4.4	\$990.00								
1/11/2021	Jim Thornton	Call with Blake Peters regarding staffing data [.1]	\$500.00	0.1	\$50.00								
1/11/2021	Jim Thornton	Call with David Marks regarding responses due on 1/15 [.9]	\$500.00	0.9	\$450.00								
1/11/2021	Jim Thornton	Review of JOTP motion [.2]	\$500.00	0.2	\$100.00								
1/11/2021	Jim Thornton	Received and reviewed numerous emails regarding meet and confer [.2]	\$500.00	0.2	\$100.00								
1/12/2021	David Marks	Receipt and review Attorney Umpierre's proposed affidavit and suggest FN 2 language to opposition to MTS Schroyer [.20]	\$950.00	0.2	\$190.00								
1/12/2021	David Marks	Receipt and review Sunrise PowerPoint slides supporting Dr. Cristina Flores analysis [.50]	\$950.00	0.5	\$475.00								
1/12/2021	David Marks	GoToMeeting with Attorney Thornton to discuss edits [3.30]	\$950.00	3.3	\$3,135.00								
1/12/2021	Jim Thornton	Review of additional documents related to Lacey depo and downloaded and noted importance [1.3]	\$500.00	1.3	\$650.00								
1/12/2021	Jim Thornton	Emails with Brian Umpierre regarding various terms identified [.2]	\$500.00	0.2	\$100.00								
1/12/2021	Jim Thornton	Work on task times from Sunrise versus Table 3 from Flores [.4]	\$500.00	0.4	\$200.00								
1/12/2021	Jim Thornton	GoToMeeting and calls with David Marks regarding response to MTS Flores and Schroyer [3.3]	\$500.00	3.3	\$1,650.00								
1/13/2021	David Marks	Receipt and review Attorney Wallace edits to opposition to MTS Dale Schroyer [.80]	\$950.00	0.8	\$760.00								
1/13/2021	David Marks	GoToMeeting and teleconference with Attorney Thornton regarding Attorney Wallace's edits to opposition to MTS Schroyer declaration, and To Do list regarding review of Sunrise task time data/presentation, and Sunrise task time data to send to Schroyer [2.50]	\$950.00	2.5	\$2,375.00								
1/13/2021	David Marks	Compose email to Attorneys Wallace and Healey transmitting latest edits [.10]	\$950.00	0.1	\$95.00								
1/13/2021	David Marks	Receipt and review email from Attorney Umpierre regarding the meet and confer with Gibson Dunn regarding CLM inspection [.10]	\$950.00	0.1	\$95.00								
1/13/2021	David Marks	GoToMeeting with J. Thornton re: MTS Schroyer and final edits [2.5]	\$950.00	2.5	\$2,375.00								
1/13/2021	David Marks	Teleconference with Attorney Thornton and request call with Attorney Umpierre [.10]	\$950.00	0.1	\$95.00								
1/13/2021	David Marks	Compose email to B. Peters and Schroyer forwarding email from Attorney Umpierre [.10]	\$950.00	0.1	\$95.00								
1/13/2021	David Marks	Teleconference with Attorney Thornton to draft email to Attorney Umpierre regarding Ashley Allyn problematic responses to Plaintiff's questions regarding scheme, user interface, and user guide flow charts [.40]	\$950.00	0.4	\$380.00								
1/13/2021	David Marks	Teleconference with Attorney Umpierre regarding Ashley Allyn letter [.20]	\$950.00	0.2	\$190.00								
1/13/2021	David Marks	Receipt and review email from Attorney Umpierre regarding discovery request for staffing software [.10]	\$950.00	0.1	\$95.00								
1/13/2021	Jim Thornton	Review of MTS Schroyer and Guy Wallace's edits [.4]	\$500.00	0.4	\$200.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
<u>Fees</u>													
1/13/2021	Jim Thornton	Calls and GoToMeeting w/ David Marks regarding MTS Schroyer 1.8	\$500.00	1.8	\$900.00								
1/13/2021	Jim Thornton	Call with Brian Umpierre regarding meet cand confer issues .3	\$500.00	0.3	\$150.00								
1/13/2021	Jim Thornton	Call with Dale Schroyer regarding Sunrise task times and TCB document review .3	\$500.00	0.3	\$150.00								
1/13/2021	Jim Thornton	Attempted to arrange calls with Ed Jones .2	\$500.00	0.2	\$100.00								
1/13/2021	Jim Thornton	Work on final edits to opp to MTS Schroyer .7	\$500.00	0.7	\$350.00								
1/13/2021	Jim Thornton	Call from David Marks requesting set-up call with Attorney Umpierre .1	\$500.00	0.1	\$50.00								
1/13/2021	Jim Thornton	Call with David Marks regarding to draft email to Brian Umpierre regarding defense counsel's responses to Plaintiff's questions regarding scheme, user interface, and user guide flow charts .4	\$500.00	0.4	\$200.00								
1/14/2021	David Marks	Edit intro for Dr. Cristina Flores opposition to MTS .10	\$950.00	0.1	\$95.00								
1/14/2021	David Marks	Teleconference with Attorney Thornton to discuss Defendant's conflation of 2 Flores opinions .20	\$950.00	0.2	\$190.00								
1/14/2021	David Marks	Receipt and review Dale Schroyer's critique of Sunrise's staffing approach (CLM), and schedule call to discuss .30	\$950.00	0.3	\$285.00								
1/14/2021	David Marks	Review Maryott' 9.24.20 letter .10	\$950.00	0.1	\$95.00								
1/14/2021	David Marks	Teleconference with Attorney Healey regarding Attorney Umpierre's request for any response to Maryott's 9.24.20 post-depo request .30	\$950.00	0.3	\$285.00								
1/14/2021	David Marks	Teleconference with Attorney Thornton regarding comparing Maryott 8.7.20 post-depo request to her 9.24.20 request, and review proposed email .60	\$950.00	0.6	\$570.00								
1/14/2021	David Marks	Compose email to Attorneys Umpierre and Healey regarding 8.14.20 response to 8.7.20 Maryott letter and of 9.24.20 letter .40	\$950.00	0.4	\$380.00								
1/14/2021	David Marks	Review Attorney Umpierre's edits to Schroyer MTS opposition .30	\$950.00	0.3	\$285.00								
1/14/2021	David Marks	Receipt and review Scheduling Order .20	\$950.00	0.2	\$190.00								
1/14/2021	Jim Thornton	Emails regarding post deposition requests by Maryott--pulled 924 letter and compared same to our 8/14 response .6	\$500.00	0.6	\$300.00								
1/14/2021	Jim Thornton	Calls with David Marks regarding Maryott letters and post deposition demands .8	\$500.00	0.8	\$400.00								
1/14/2021	Jim Thornton	Work on updating Sunrise service code key 3.7	\$500.00	3.7	\$1,850.00								
1/14/2021	Jim Thornton	Review of SUN0137586 TCB Documentation .5	\$500.00	0.5	\$250.00								
1/15/2021	David Marks	Continue edits and revisions of intro and key issues to opposition to MTS for Dr. Cristina Flores 2.50	\$950.00	2.5	\$2,375.00								
1/15/2021	David Marks	Receipt and review Sunrise's recent discovery production 1.14.21 and check to see if missing assessments are included .30	\$950.00	0.3	\$285.00								
1/15/2021	David Marks	Receipt and review updates regarding opposition to MTS Schroyer .20	\$950.00	0.2	\$190.00								
1/15/2021	David Marks	Teleconference with B. Peters to discuss audit of new assessment data .30	\$950.00	0.3	\$285.00								
1/15/2021	David Marks	Review Gorman's assessment documents produced and emails between Gorman and Attorney Umpierre .20	\$950.00	0.2	\$190.00								
1/15/2021	David Marks	GoToMeeting with Attorney Thornton regarding same .60	\$950.00	0.6	\$570.00								
1/15/2021	David Marks	Review meta data and found some missing for task time spreadsheets .10	\$950.00	0.1	\$95.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/15/2021	David Marks	Compose email to Attorney Healey and Umpierre regarding same .10	\$950.00	0.1	\$95.00								
1/15/2021	David Marks	GoToMeeting with Attorney J. Thornton re: Flores MTS 2.0	\$950.00	2	\$1,900.00								
1/15/2021	Jim Thornton	Texts with Blake Peters regarding updated assessment data, downloaded zip file and shared with Blake Peters .3	\$500.00	0.3	\$150.00								
1/15/2021	Jim Thornton	Brief GoToMeeting w/Blake Peters regarding task times .2	\$500.00	0.2	\$100.00								
1/15/2021	Jim Thornton	Began review of documents produced by Sunrise 3.5	\$500.00	3.5	\$1,750.00								
1/15/2021	Jim Thornton	Calls with David Marks and GoToMeeting regarding discovery issues-- metadata and missing Beverly Hills assessments .6	\$500.00	0.6	\$300.00								
1/15/2021	Jim Thornton	GoToMeeting w/David Marks regarding response to Flores MTS 2.0	\$500.00	2	\$1,000.00								
1/16/2021	David Marks	Receipt and review emails from Attorneys Healey and Johnson regarding ESI order and request to produce metadata .10	\$950.00	0.1	\$95.00								
1/18/2021	David Marks	Review B. Peters' analysis on audit of production for missing assessments 1.40	\$950.00	1.4	\$1,330.00								
1/18/2021	David Marks	Compose email to Attorney Healey regarding assessments still missing .10	\$950.00	0.1	\$95.00								
1/18/2021	David Marks	GoToMeeting with Attorney Thornton, Dale Schroyer and Kurt Shampine to discuss MedModel analysis of Sunrise task time data/PowerPoints, length of time to run Rubik's cube, identify defects in Sunrise system, depo questions, quality assurance, and staffing difference between Sunrise reports and punch detail 1.30	\$950.00	1.3	\$1,235.00								
1/18/2021	David Marks	Review B. Peters' revised analysis of missing assessments .20	\$950.00	0.2	\$190.00								
1/18/2021	David Marks	GoToMeeting with Attorney Thornton regarding missing assessment data based on move in/leave of absence data and gaps in assessment 1.80	\$950.00	1.8	\$1,710.00								
1/18/2021	David Marks	Teleconference with Attorney Healey regarding deadlines .70	\$950.00	0.7	\$665.00								
1/18/2021	David Marks	GoToMeeting with Attorney Thornton regarding opposition to MTS Flores 1.70	\$950.00	1.7	\$1,615.00								
1/18/2021	David Marks	Teleconference with Attorney Thornton re: assessment data and various to-dos .60	\$950.00	0.6	\$570.00								
1/18/2021	Jim Thornton	GoToMeeting with David Marks regarding Flores MTS 1.7	\$500.00	1.7	\$850.00								
1/18/2021	Jim Thornton	GoToMeetings w/David Marks regarding missing assessment analysis 1.8	\$500.00	1.8	\$900.00								
1/18/2021	Jim Thornton	Work on email to California team regarding missing assessments .2	\$500.00	0.2	\$100.00								
1/18/2021	Jim Thornton	GoToMeeting w/David Marks, Dale Schroyer and Kurt Shampine regarding deadlines, sim prep, and document review 1.3	\$500.00	1.3	\$650.00								
1/18/2021	Jim Thornton	Began review of document dump from Sunrise--saving key items to folder for Lacey depo prep 2.6	\$500.00	2.6	\$1,300.00								
1/18/2021	Jim Thornton	Calls with David Marks regarding assessment data and various to-dos .6	\$500.00	0.6	\$300.00								
1/18/2021	Jim Thornton	Multiple calls with Blake Peters regarding missing assessment analysis and SUN0111973 PPT .7	\$500.00	0.7	\$350.00								
1/18/2021	Jim Thornton	Review of facility floor plans .4	\$500.00	0.4	\$200.00								
1/19/2021	David Marks	Edits to opposition to MTS Flores 1.40	\$950.00	1.4	\$1,330.00								
1/19/2021	David Marks	Review status of floor plans and task time pulls .20	\$950.00	0.2	\$190.00								
1/19/2021	David Marks	GoToMeeting with Attorney Thornton to discuss continued edits to opposition to MTS Flores 2.00	\$950.00	2	\$1,900.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
1/19/2021	David Marks	Continued edits of opposition to MTS Flores, including conflation by Sunrise of floor and simple math [.50]	\$950.00	0.5	\$475.00								
1/19/2021	David Marks	Teleconference with Attorney Healey to discuss whether task times can be discussed in opposition to MTS Flores, and to discuss status of discovery [.30]	\$950.00	0.3	\$285.00								
1/19/2021	David Marks	Continue edits of opposition to MTS Flores [.40]	\$950.00	0.4	\$380.00								
1/19/2021	David Marks	GoToMeeting with Attorney Thornton regarding opposition to MTS Flores and identifying attack points that must be addressed [2.10]	\$950.00	2.1	\$1,995.00								
1/19/2021	David Marks	Revise remainder of intro of opposition to MTS Flores and structure of opposition to address 7 remaining Sunrise attack points [2.30]	\$950.00	2.3	\$2,185.00								
1/19/2021	Sterling Meachen	Using discovery data illustrated all La Jolla and drew out rooms and activities areas by color code.	\$225.00	2.6	\$585.00								
1/19/2021	Jim Thornton	Call with Sterling Meachen about floor plans and emailed Dale Schroyer's re same [.3]	\$500.00	0.3	\$150.00								
1/19/2021	Jim Thornton	Continued review of documents recently produced by Sunrise [2.4]	\$500.00	2.4	\$1,200.00								
1/19/2021	Jim Thornton	Email to Dale Schroyer regarding standard deviation notation for service code key [.2]	\$500.00	0.2	\$100.00								
1/19/2021	Jim Thornton	GoToMeetings with David Marks on response to MTS Flores dec [4.1]	\$500.00	4.1	\$2,050.00								
1/19/2021	Jim Thornton	Independent work on intro to response and emailed to David Marks [.8]	\$500.00	0.8	\$400.00								
1/20/2021	David Marks	Receipt and review Gorman exhibits ISO Sunrise declaration [.10]	\$950.00	0.1	\$95.00								
1/20/2021	David Marks	Receipt and review motion for status conference and memorandum [.20]	\$950.00	0.2	\$190.00								
1/20/2021	David Marks	Receipt and review Gorman's response email to missing assessments saying he will search for them, but that Plaintiff should have them in .PDF format [.10]	\$950.00	0.1	\$95.00								
1/20/2021	David Marks	Teleconference with Attorney Thornton to discuss same [.60]	\$950.00	0.6	\$570.00								
1/20/2021	David Marks	Compose email to CA Team regarding requesting search of .PDFs for missing gap assessments [.10]	\$950.00	0.1	\$95.00								
1/20/2021	David Marks	Review parent entities emails [.10]	\$950.00	0.1	\$95.00								
1/20/2021	David Marks	Review reply brief for certification, Schroyer opposition to MTS, and make list of arguments to include in Flores opposition to MTS [3.80]	\$950.00	3.8	\$3,610.00								
1/20/2021	David Marks	Compose email to Attorney Thornton suggesting edit ideas [.10]	\$950.00	0.1	\$95.00								
1/20/2021	David Marks	GoToMeeting with Attorney Thornton to discuss my edits and list of changes to be made to address Defendant's arguments [2.20]	\$950.00	2.2	\$2,090.00								
1/20/2021	David Marks	Edit and review flows analysis edits [.60]	\$950.00	0.6	\$570.00								
1/20/2021	David Marks	Compose email to Attorney Thornton transmitting same [.10]	\$950.00	0.1	\$95.00								
1/20/2021	David Marks	GoToMeeting with Attorney Thornton to discuss Table 3 sources in Flores opposition to MTS [1.00]	\$950.00	1	\$950.00								
1/20/2021	Sterling Meachen	Using discovery data illustrated Raphael and drew out rooms and activities areas by color code	\$225.00	4.9	\$1,102.50								
1/20/2021	Jim Thornton	Call from David Marks and email regarding missing assessments and whether we can find them in .pdfs and regarding Flores MTS intro simplification [.6]	\$500.00	0.6	\$300.00								

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						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
1/20/2021	Jim Thornton	Text from Dale Schroyer .1	\$500.00	0.1	\$50.00								
1/20/2021	Jim Thornton	Emails with Sterling Meachen regarding Monterey Google Earth measurements .1	\$500.00	0.1	\$50.00								
1/20/2021	Jim Thornton	Emails with Diane Asher regarding reply to class cert .2	\$500.00	0.2	\$100.00								
1/20/2021	Jim Thornton	Sent review of reply to opposition to class cert regarding handling of task time issues, pulled language and emailed to David Marks .4	\$500.00	0.4	\$200.00								
1/20/2021	Jim Thornton	Work with David Marks on GoToMeeting regarding Flores MTS 3.2	\$500.00	3.2	\$1,600.00								
1/20/2021	Jim Thornton	Independent work on flaws analysis section 1.0	\$500.00	1	\$500.00								
1/21/2021	David Marks	Receipt and review email from Attorney Umpierre comparing assessment .PDF to data for missing assessments .10	\$950.00	0.1	\$95.00								
1/21/2021	David Marks	Review opposition to MTS Flores determining Sunrise's implausible explanation, poorly fabricated excuse, inherently suspect excuse, absolving themselves of blame - dubious excuse, and list of Sunrise attacks and reply to same .80	\$950.00	0.8	\$760.00								
1/21/2021	David Marks	Teleconference with Attorney Thornton regarding work required to compare .PDF to missing assessment data (estimate of 2 weeks for this project), and update latest stats on missing daily assessment data .10	\$950.00	0.1	\$95.00								
1/21/2021	David Marks	Edits regarding key points and facts of Flores opposition to MTS 4.50	\$950.00	4.5	\$4,275.00								
1/21/2021	David Marks	GoToMeeting with Attorney Thornton to discuss same from Flores declaration, reply declaration, motion for certification, and Schroyer opposition to MTS 5.10	\$950.00	5.1	\$4,845.00								
1/21/2021	Jim Thornton	Email to Dale Schroyer w/updated floorplans .2	\$500.00	0.2	\$100.00								
1/21/2021	Jim Thornton	Work with Dale Schroyer regarding expressing standard deviations in the service code key .2	\$500.00	0.2	\$100.00								
1/21/2021	Jim Thornton	Calls to Blake Peters regarding missing assessments .2	\$500.00	0.2	\$100.00								
1/21/2021	Jim Thornton	Email to Blake Peters regarding daily missing assessment analysis .3	\$500.00	0.3	\$150.00								
1/21/2021	Jim Thornton	Review of Brian Umpierre's DropBox of 246 .pdf assessments-7.74 GB of data ranging from roughly 307 pages to over 100 for rough calculations of how long to extract the missing data from them into .csv .6	\$500.00	0.6	\$300.00								
1/21/2021	Jim Thornton	Quick call to Blake Peters .1	\$500.00	0.1	\$50.00								
1/21/2021	Jim Thornton	Emails with Brian Umpierre regarding duplicate unique resident IDs .2	\$500.00	0.2	\$100.00								
1/21/2021	Jim Thornton	Emails to and from Brian Umpierre regarding Malone and motion practice history related to assessments .4	\$500.00	0.4	\$200.00								
1/21/2021	Jim Thornton	GoToMeeting and calls with David Marks regarding Flores MTS 5.1	\$500.00	5.1	\$2,550.00								
1/21/2021	Jim Thornton	Texts with Dr. Flores regarding time study and facilities involved .2	\$500.00	0.2	\$100.00								
1/21/2021	Jim Thornton	Call with David Marks regarding effort required to compare .PDF to missing assessment data .1	\$500.00	0.1	\$50.00								
1/22/2021	David Marks	Review Attorney Wallace's edits to Flores opposition to MTS, and integrate his edits with mine and Attorney Thornton's edits 5.70	\$950.00	5.7	\$5,415.00								
1/22/2021	David Marks	GoToMeeting re: Attorney Wallace's edits to Flores MTS opposition and record support for same 6.50	\$950.00	6.5	\$6,175.00	6.5	\$6,175.00						

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						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/22/2021	David Marks	Teleconference with Attorney Healey regarding status report on Flores opposition to MTS [.20]	\$950.00	0.2	\$190.00								
1/22/2021	Jim Thornton	Work on data review for Lacey depo [.6]	\$500.00	0.6	\$300.00								
1/22/2021	Jim Thornton	W/with David Marks on GoToMeeting regarding intro and Guy Wallace's edits to response to MTS Flores [.6.5]	\$500.00	6.5	\$3,250.00	6.5	\$3,250.00						
1/22/2021	Jim Thornton	Discussion with Dale Schroyer regarding his analysis of production and summary [.2]	\$500.00	0.2	\$100.00								
1/23/2021	David Marks	Receipt and review Attorney Healey's comments to edits to Flores opposition to MTS [.30]	\$950.00	0.3	\$285.00								
1/23/2021	David Marks	Compose email to Attorneys Healey and Thornton regarding a To Do list [.10]	\$950.00	0.1	\$95.00								
1/24/2021	David Marks	Compose email to Attorney Thornton regarding To Do list (task times sources corroborating Flores Table 3) [.20]	\$950.00	0.2	\$190.00								
1/24/2021	David Marks	Teleconference with Attorney Thornton regarding same [.20]	\$950.00	0.2	\$190.00								
1/24/2021	Jim Thornton	Call from David Marks regarding task times that corroborate Flores Table 3 [.2]	\$500.00	0.2	\$100.00								
1/24/2021	Jim Thornton	Work on structure of Table 3 regarding corroborating task times [.4]	\$500.00	0.4	\$200.00								
1/25/2021	David Marks	Teleconference with Attorney Thornton regarding edits to Flores opposition to MTS and sources corroborating Flores Table 3 [.20]	\$950.00	0.2	\$190.00								
1/25/2021	David Marks	Revise edits to address key points/issues in Flores opposition to MTS [.2.30]	\$950.00	2.3	\$2,185.00								
1/25/2021	David Marks	Review Attorney Thornton's new paragraphs regarding task time support for Table 3, and addition of response to ADL in NH v. ALF argument [.20]	\$950.00	0.2	\$190.00								
1/25/2021	David Marks	GoToMeeting with Attorney Thornton regarding same [.3.50]	\$950.00	3.5	\$3,325.00								
1/25/2021	David Marks	GoToMeeting with Attorney Thornton to review and continue Flores opposition to MTS edits, including addressing ADLs in NH vs. ALF, Musokee depo, cites, Flores Table 3, Dr. Schnelle task times, and related issues [.5.70]	\$950.00	5.7	\$5,415.00								
1/25/2021	Jim Thornton	Work on Table 3 task time corroboration project [.3.4]	\$500.00	3.4	\$1,700.00								
1/25/2021	Jim Thornton	Calls with David Marks regarding same [.2]	\$500.00	0.2	\$100.00								
1/25/2021	Jim Thornton	Work on and GoToMeeting w/David Marks regarding Task Time project and related call with David Marks [.6.5]	\$500.00	6.5	\$3,250.00	6.5	\$3,250.00						
1/26/2021	David Marks	Receipt and review Attorney Healey's comments to Attorney Umpierre declaration regarding status conference concerning missing assessment data [.10]	\$950.00	0.1	\$95.00								
1/26/2021	David Marks	Review and note Flores opposition to MTS remaining points to address [.20]	\$950.00	0.2	\$190.00								
1/26/2021	David Marks	GoToMeeting with Attorney Thornton regarding same [.40]	\$950.00	0.4	\$380.00								
1/26/2021	David Marks	Review Dale Schroyer's analysis of Lacey's PowerPoint [.60]	\$950.00	0.6	\$570.00								
1/26/2021	David Marks	Review and revise edits to Flores opposition to MTS regarding Musokee/Crandall's no basis, quantify missing assessments, and gathering of sources/references [.10]	\$950.00	0.1	\$95.00								
1/26/2021	David Marks	GoToMeeting with Attorney Thornton regarding footnotes to task time section [.90]	\$950.00	0.9	\$855.00								
1/26/2021	Jim Thornton	Review of Dale Schroyer summary of document review and sent to David Marks [.6]	\$500.00	0.6	\$300.00								
1/26/2021	Jim Thornton	Call from David Marks regarding footnotes [.6]	\$500.00	0.6	\$300.00								
1/26/2021	Jim Thornton	Calls with Blake Peters regarding missing assessment info [.3]	\$500.00	0.3	\$150.00								

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
							<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/26/2021	Jim Thornton	Email from David Marks regarding task time insert .1	\$500.00	0.1	\$50.00								
	1/26/2021	Jim Thornton	Work on pulling support regarding NH v. ALF task time issue and prepared footnotes 1.1	\$500.00	1.1	\$550.00								
	1/26/2021	Jim Thornton	GoToMeetings w/David Marks regarding footnotes to task time section and remaining points to address in opp to MTS Flores 1.3	\$500.00	1.3	\$650.00								
	1/26/2021	Jim Thornton	Email from Chris Healey with comments to latest draft of Opp to MTS .3	\$500.00	0.3	\$150.00								
	1/27/2021	David Marks	Review Attorney Healey's edits to Flores opposition to MTS and respond to email regarding Sunrise grooming and dressing times .20	\$950.00	0.2	\$190.00								
	1/27/2021	David Marks	Teleconference with Attorney Thornton regarding same .20	\$950.00	0.2	\$190.00								
	1/27/2021	David Marks	Propose edits to Attorney Healey's draft of Flores opposition to MTS .50	\$950.00	0.5	\$475.00								
	1/27/2021	David Marks	GoToMeeting with Attorney Thornton regarding same 1.20	\$950.00	1.2	\$1,140.00								
	1/27/2021	David Marks	Receipt and review email from Tim Needham regarding Sunrise parent entities .30	\$950.00	0.3	\$285.00								
	1/27/2021	David Marks	Teleconference with Attorney Healey to discuss new edits to Flores opposition to MTS (left message) .10	\$950.00	0.1	\$95.00								
	1/27/2021	Jim Thornton	Call with David Marks regarding awaken and get ready/grooming/dressing .2	\$500.00	0.2	\$100.00								
	1/27/2021	Jim Thornton	Work with David Marks on GoToMeeting regarding final edits to Opp to MTS Flores on 1.2	\$500.00	1.2	\$600.00								
	1/28/2021	David Marks	Organize file for Flores opposition to MTS drafts .20	\$950.00	0.2	\$190.00								
	1/28/2021	David Marks	Teleconference with Attorney Healey regarding sur-reply point-count point needed prior to certification hearing tomorrow .20	\$950.00	0.2	\$190.00								
	1/28/2021	Jim Thornton	Emails regarding Mosby's applying to both NH and ALF with Brian Umpierre and Diane Asher .2	\$500.00	0.2	\$100.00								
	1/29/2021	David Marks	Review Sunrise sur-reply .20	\$950.00	0.2	\$190.00								
	1/29/2021	David Marks	Teleconference with Attorney Thornton to draft point-counter point to send to Attorney Healey prior to certification hearing today 2.00	\$950.00	2	\$1,900.00								
	1/29/2021	David Marks	Teleconference with Attorney Healey regarding certification hearing (judge's comments) and extrapolation .50	\$950.00	0.5	\$475.00								
	1/29/2021	David Marks	Teleconference with B. Peters regarding target hour distribution (average hours per facility) .20	\$950.00	0.2	\$190.00								
	1/29/2021	Jim Thornton	Call and work with David Marks regarding sur-reply of Sunrise and notes for hearing 2.0	\$500.00	2	\$1,000.00								
	2/1/2021	David Marks	Teleconference with Attorney Thornton regarding Kennedy call regarding "synthetic" workload relationship with target hours .40	\$950.00	0.4	\$380.00								
	2/1/2021	David Marks	Teleconference with B. Peters regarding distribution of target hours .10	\$950.00	0.1	\$95.00								
	2/1/2021	David Marks	Review email from Attorney Healey regarding 2 discovery questions .10	\$950.00	0.1	\$95.00								
	2/1/2021	Jim Thornton	Call from David Marks regarding tomorrow's call and extrapolation of data .4	\$500.00	0.4	\$200.00								
	2/1/2021	Jim Thornton	Messages with Dale Schroyer regarding extrapolation .1	\$500.00	0.1	\$50.00								

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				Worked			General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
2/2/2021	David Marks	Teleconference with Attorneys Healey and Thornton, Dale Schroyer, and Pat Kennedy regarding extrapolation from each service level to ADLs defined by a specific band width (based on assessment data) 1.50	\$950.00	1.5		\$1,425.00								
2/2/2021	David Marks	Multiple emails from Attorney Thornton regarding service level and translation to ADLs based on assessments .60	\$950.00	0.6		\$570.00								
2/2/2021	David Marks	Teleconference with Attorneys Healey, Umpierre, and Johnson regarding open discovery issues .90	\$950.00	0.9		\$855.00								
2/2/2021	Jim Thornton	Call with Dale Schroyer regarding extrapolation of data .4	\$500.00	0.4		\$200.00								
2/2/2021	Jim Thornton	Email to David Marks regarding Dale Schroyer thoughts as to extrapolation .3	\$500.00	0.3		\$150.00								
2/2/2021	Jim Thornton	Sent David Marks listing of commercially available ALF staffing software programs .2	\$500.00	0.2		\$100.00								
2/2/2021	Jim Thornton	Conference call with California team, Pat Kennedy, Dale Schroyer, and David Marks regarding extrapolation of data to other facilities 1.5	\$500.00	1.5		\$750.00			1.5	750				
2/2/2021	Jim Thornton	Emails with Blake Peters and David Marks, Chris Healey regarding billing service history .2	\$500.00	0.2		\$100.00								
2/2/2021	Jim Thornton	Review of PPT regarding CLM software .1	\$500.00	0.1		\$50.00								
2/2/2021	Jim Thornton	Email to David Marks regarding same .1	\$500.00	0.1		\$50.00								
2/2/2021	Jim Thornton	Call with Dale Schroyer regarding DES testing .6	\$500.00	0.6		\$300.00								
2/2/2021	Jim Thornton	Created email listing of final discovery items to request and sent to David Marks .3	\$500.00	0.3		\$150.00								
2/4/2021	David Marks	Teleconference with Attorney Thornton regarding new assessments received, status of assessment analysis project .20	\$950.00	0.2		\$190.00								
2/4/2021	Jim Thornton	Received and reviewed and downloaded updated assessment data- sent share to Blake Peters .3	\$500.00	0.3		\$150.00								
2/4/2021	Jim Thornton	Call with David Marks regarding new assessment data, status of assessment analysis .2	\$500.00	0.2		\$100.00								
2/5/2021	Jim Thornton	Email to David Marks and Brian Umpierre time standards .2	\$500.00	0.2		\$100.00								
2/8/2021	Jim Thornton	Began analysis of latest data and creation of service code key 2.9	\$500.00	2.9		\$1,450.00								
2/9/2021	Jacques Balette	Meeting with Attorney Marks to develop witness list from social media	\$750.00	1		\$750.00								
2/9/2021	Jacques Balette	Meeting with Attorney Marks re: daughter whose mother resided at Sunrise of La Jolla and her ability to testify and personal knowledge of understaffing and care deprivation	\$750.00	0.6		\$450.00								
2/9/2021	Jacques Balette	Review all interviews with witness Evans and her daughter 1.1	\$750.00	1.1		\$825.00								
2/9/2021	Jacques Balette	Discuss with investigator .2	\$750.00	0.2		\$150.00								
2/9/2021	David Marks	Witness Project: Meeting with Attorney Balette regarding witness list from social media 1.00	\$950.00	1		\$950.00								
2/9/2021	David Marks	Teleconference with Harry Fleming to discuss drafting/editing communication to potential witnesses .20	\$950.00	0.2		\$190.00								
2/9/2021	David Marks	Teleconference with Attorney Thornton regarding update on inputting new assessment data (service code key) .20	\$950.00	0.2		\$190.00								
2/9/2021	David Marks	Receipt and review investigator reports of witness interviews from Harry Fleming .30	\$950.00	0.3		\$285.00								
2/9/2021	David Marks	Teleconference with Fleming to discuss and edit investigator reports of witness interviews 1.00	\$950.00	1		\$950.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
2/9/2021	David Marks	Meeting with Attorney Balette to discuss Rachel Evans, daughter of Sharon Evans, resident of La Jolla [.60]	\$950.00	0.6	\$570.00								
2/9/2021	David Marks	Review Rachel Evans emails and wait logs [.30]	\$950.00	0.3	\$285.00								
2/9/2021	David Marks	Receipt and review witness interviews from Harry Fleming [0.10]	\$950.00	0.1	\$95.00								
2/9/2021	David Marks	Teleconference with Harry Fleming regarding Sunrise witnesses Marissa Delgado, LVN, Care Director [.50]	\$950.00	0.5	\$475.00								
2/9/2021	David Marks	Compose email to Attorney Michael Thamer transmitting witness statement and emails to corporate from witness Rachel Evans [.20]	\$950.00	0.2	\$190.00								
2/9/2021	David Marks	Receipt and review email regarding case status - amending class discovery (telephonic conference - email 2.6.21 from Attorney Umpierre [.30]	\$950.00	0.3	\$285.00								
2/9/2021	Jim Thornton	Call to Blake Peters regarding new data [.2]	\$500.00	0.2	\$100.00								
2/9/2021	Jim Thornton	Call from David Marks regarding status [.2]	\$500.00	0.2	\$100.00								
2/9/2021	Jim Thornton	Work on service code key and identifying all tasks in latest produced assessments [6.0]	\$500.00	6	\$3,000.00		6	\$3,000.00					
2/9/2021	Jim Thornton	Sent Blake Peters a list of documents that we may need for simple math analysis [.3]	\$500.00	0.3	\$150.00								
2/10/2021	Jacques Balette	Review email from Attorney Marks re: Merissa Delgado, Rachel Evans, and Lisa Evans Rosado	\$750.00	0.4	\$300.00								
2/10/2021	David Marks	Receipt and review 2.9.21 emails regarding proposed class definition for Amended Class Complaint [.20]	\$950.00	0.2	\$190.00								
2/10/2021	David Marks	Compose email to Attorney Umpierre regarding job title job description of Marissa Delgado [.10]	\$950.00	0.1	\$95.00								
2/10/2021	David Marks	Teleconference with Harry Fleming regarding investigation of former employees/weekly meetings [.60]	\$950.00	0.6	\$570.00								
2/10/2021	David Marks	Review email from Attorneys Umpierre and Thornton regarding job descriptions [.20]	\$950.00	0.2	\$190.00								
2/10/2021	David Marks	Teleconference with Harry Fleming about status of witness project [.50]	\$950.00	0.5	\$475.00								
2/10/2021	David Marks	Review and edit 3 witnesses [.10]	\$950.00	0.1	\$95.00								
2/10/2021	David Marks	Teleconference with Harry Fleming and Marisa Duetzel regarding status of witness locates and witness calls [2.90]	\$950.00	2.9	\$2,755.00								
2/10/2021	David Marks	Create summary of witness project work [1.00]	\$950.00	1	\$950.00								
2/10/2021	David Marks	Compose email to CA Team regarding same [.10]	\$950.00	0.1	\$95.00								
2/10/2021	David Marks	RR email from Attorney J. Thornton re: all Sunrise job titles [.10]	\$950.00	0.1	\$95.00								
2/10/2021	Jim Thornton	Continue work on service code key and task time/frequencies based on Aegis [4.5]	\$500.00	4.5	\$2,250.00								
2/10/2021	Jim Thornton	Sent service code key to Blake Peters [.1]	\$500.00	0.1	\$50.00								
2/10/2021	Jim Thornton	Sent David Marks all Sunrise job titles [.2]	\$500.00	0.2	\$100.00								
2/11/2021	David Marks	Compose email to CA Team transmitting emails from Rachel Evans (corporate) with short explanation of their importance [.10]	\$950.00	0.1	\$95.00								
2/11/2021	David Marks	Update on Lacey depo prep [.20]	\$950.00	0.2	\$190.00								
2/11/2021	David Marks	Teleconference with Attorney Thornton regarding response to Lacey depo time, discuss Attorney Healey's request for "last call" discovery and evidence of Sunrise current staffing method (CLM) [.20]	\$950.00	0.2	\$190.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
2/11/2021	David Marks	Received and reviewed Attorney Healey's Sunrise exposure analysis .20	\$950.00	0.2		\$190.00								
2/11/2021	David Marks	RR email from Attorney J. Thornton re: CLM process and link to key docs .70	\$950.00	0.7		\$665.00								
2/11/2021	Jim Thornton	Email to David Marks w/Dale Schroyer review of CLM process and link to key docs in response to Chris Healey request .4	\$500.00	0.4		\$200.00								
2/11/2021	Jim Thornton	Found draft letter to Judge Guilford regarding discovery issues and descriptions .2	\$500.00	0.2		\$100.00								
2/11/2021	Jim Thornton	Call with David Marks regarding Chris Healey request .2	\$500.00	0.2		\$100.00								
2/11/2021	Jim Thornton	Sent email to Chris Healey with requested info .3	\$500.00	0.3		\$150.00								
2/11/2021	Jim Thornton	Calls w/Blake Peters regarding service codes .3	\$500.00	0.3		\$150.00								
2/12/2021	David Marks	RR email from Attorney J. Thornton re: resident IDs not matching billing service history and assessment data. .40	\$950.00	0.4		\$380.00								
2/12/2021	Jim Thornton	Work with Blake Peters regarding using billing service history to confirm needs remain unchanged in early portions of sample timeframes where assessment data is missing .2	\$500.00	0.2		\$100.00								
2/12/2021	Jim Thornton	Email to David Marks regarding resident IDs not matching in billing service history and assessment data .2	\$500.00	0.2		\$100.00								
2/12/2021	Jim Thornton	Sent Chris Healey and Brian Umpierre email regarding resident ID issue .3	\$500.00	0.3		\$150.00								
2/12/2021	Jim Thornton	Received and reviewed draft M&C letter and responded to Brian Umpierre .2	\$500.00	0.2		\$100.00								
2/12/2021	Jim Thornton	Email to Brian Umpierre regarding pendant data request .1	\$500.00	0.1		\$50.00								
2/15/2021	Jim Thornton	Call w/Blake Peters regarding simple math .2	\$500.00	0.2		\$100.00								
2/16/2021	David Marks	Review and compose To Do list re: service code key analysis, task times, timeline for completion of analysis .70	\$950.00	0.7		\$665.00								
2/16/2021	David Marks	Teleconference with Attorney J. Thornton re: the new list .20	\$950.00	0.2		\$190.00								
2/16/2021	David Marks	Dr. Edward Jones, and email to ProModel regarding conference call .70	\$950.00	0.7		\$665.00								
2/16/2021	David Marks	Compose and respond to emails regarding setting up conference call with ProModel regarding status .20	\$950.00	0.2		\$190.00								
2/16/2021	Jim Thornton	Work with David Marks regarding schedule and to dos .2	\$500.00	0.2		\$100.00								
2/16/2021	Jim Thornton	Work with Blake Peters regarding inputs for simulation, simple math and status .4	\$500.00	0.4		\$200.00								
2/16/2021	Jim Thornton	Scheduled Dr. Cristina Flores meeting .1	\$500.00	0.1		\$50.00								
2/16/2021	Jim Thornton	GoToMeeting w/Dr. Cristina Flores regarding task times .7	\$500.00	0.7		\$350.00								
2/16/2021	Jim Thornton	Email David Marks regarding follow up with Dr. Cristina Flores .1	\$500.00	0.1		\$50.00								
2/17/2021	Jim Thornton	Work on service code key instructions for Blake Peters .4	\$500.00	0.4		\$200.00								
2/17/2021	Jim Thornton	Work on service code based on Watermark interpretive guidelines 1.9	\$500.00	1.9		\$950.00								
2/17/2021	Jim Thornton	Emails with Dale Schroyer regarding Rubik's cube and inputs .3	\$500.00	0.3		\$150.00								
2/18/2021	David Marks	Prep for call with Pro Model re: Lacey depo and simulation testing. .50	\$950.00	0.5		\$475.00								
2/18/2021	David Marks	Conference call with Attorneys Thornton, Schroyer, Shampine and Dave Tucker re: Lacey depo and runs 1.10	\$950.00	1.1		\$1,045.00								
2/18/2021	David Marks	Teleconference with Attorney C. Healey regarding Ginder depo and CLM inspections .10	\$950.00	0.1		\$95.00								
2/18/2021	Jim Thornton	Call with Dale Schroyer, Dave Tucker, Kurt Shampine, and David Marks regarding Lacey depo and runs 1.1	\$500.00	1.1		\$550.00								

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				Worked			General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
2/18/2021	Jim Thornton	Texts and calls to Blake Peters regarding LPN inclusion .2	\$500.00	0.2		\$100.00								
2/18/2021	Jim Thornton	Emails to California team regarding CLM review and call related to rules .2	\$500.00	0.2		\$100.00								
2/19/2021	David Marks	Prepare for Lacey depo (gather key documents) .70	\$950.00	0.7		\$665.00								
2/19/2021	Jim Thornton	Call to Blake Peters regarding data pull for sim .1	\$500.00	0.1		\$50.00								
2/19/2021	Jim Thornton	Work with Dr. Cristina Flores regarding task times for use with sim on GoToMeeting 1.4	\$500.00	1.4		\$700.00								
2/19/2021	Jim Thornton	Work on task times .3	\$500.00	0.3		\$150.00								
2/21/2021	David Marks	Prepare for Lacey depo .70	\$950.00	0.7		\$665.00								
2/21/2021	David Marks	Compose email to CA Team regarding suggested questions/key points for Lacey depo (need by Wednesday at noon) .80	\$950.00	0.8		\$760.00								
2/21/2021	David Marks	Teleconference and email from and to Attorney Thornton regarding Dale Schroyer review .3 "	\$950.00	0.3		\$285.00								
2/21/2021	Jim Thornton	Call and email from and to David Marks regarding Dale Schroyer review .3	\$500.00	0.3		\$150.00								
2/21/2021	Jim Thornton	Emails from Chris Healey regarding various issues related to Lacey .2	\$500.00	0.2		\$100.00								
2/22/2021	David Marks	Prepare for Ann Lacey depo (1) Sunrise studies conducted; (2) key emails; (3) TCB PowerPoints; (4) CLR PowerPoints; (5) key exam points 6.7	\$950.00	6.7		\$6,365.00		6.7	\$6,365.00					
2/22/2021	David Marks	Teleconference with Attorney Thornton regarding status of Lacey depo prep and discussion re: B. Umpierre's memo on CLM .60	\$950.00	0.6		\$570.00								
2/22/2021	David Marks	Teleconference with Attorney Healey regarding same .30	\$950.00	0.3		\$285.00								
2/22/2021	Jim Thornton	Work on updating service code key and global expert inputs based on Friday's call with Dr. Cristina Flores, including care schedules, staff assignments, care windows and priorities 2.5	\$500.00	2.5		\$1,250.00								
2/22/2021	Jim Thornton	Work on initial set-up of Rubik's cube of possible DES tests .5	\$500.00	0.5		\$250.00								
2/22/2021	Jim Thornton	Call with Brian Umpierre and Mark Johnson and Dale Schroyer regarding inspection and rules of engagement .7	\$500.00	0.7		\$350.00								
2/22/2021	Jim Thornton	Call with Dale Schroyer regarding draft global expert inputs .2	\$500.00	0.2		\$100.00								
2/22/2021	Jim Thornton	Emails and call to Blake Peters regarding logic rules updated and updated service code key .2	\$500.00	0.2		\$100.00								
2/22/2021	Jim Thornton	Work on creating service code key based on Watermark task times and frequencies and sent same to Dr. Cristina Flores 2.8	\$500.00	2.8		\$1,400.00								
2/22/2021	Jim Thornton	Review of Brian Umpierre memo on CLM .6	\$500.00	0.6		\$300.00								
2/22/2021	Jim Thornton	Call with David Marks discussing same .2	\$500.00	0.2		\$100.00								
2/22/2021	Jim Thornton	Emails with Dale Schroyer regarding utilization rate and idle time .2	\$500.00	0.2		\$100.00								
2/23/2021	David Marks	Review Lacey email and PowerPoints for depo prep 2.90	\$950.00	2.9		\$2,755.00								
2/23/2021	David Marks	GoToMeeting with Attorney Thornton regarding key points for Lacey depo prep 2.50	\$950.00	2.5		\$2,375.00								
2/23/2021	David Marks	GoToMeeting with Attorney Thornton regarding Lacey depo prep, discussion of Dale Schroyer's key points re: Sunrise methodology and status of simulation project 2.80	\$950.00	2.8		\$2,660.00								
2/23/2021	David Marks	Teleconference with Attorney C. Healey regarding Lacey depo prep .10	\$950.00	0.1		\$95.00								
2/23/2021	Jim Thornton	Work with David Marks on GoToMeeting regarding Lacey depo prep 5.3	\$500.00	5.3		\$2,650.00								
2/23/2021	Jim Thornton	Emails w/Blake Peters regarding helper and scheduling .2	\$500.00	0.2		\$100.00								

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						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
2/23/2021	Jim Thornton	Pulled Lacey related documents for Chris Healey and sent same .6	\$500.00	0.6	\$300.00								
2/23/2021	Jim Thornton	Emails with Dale Schroyer and DT regarding utilization % normal in service industry .3	\$500.00	0.3	\$150.00								
2/23/2021	Jim Thornton	Calls with Blake Peters regarding two step encoding and various service code key logic rules--work on same and sent to Blake Peters 1.7	\$500.00	1.7	\$850.00								
2/24/2021	David Marks	Continue Lacey depo prep/depo outline, and review of Dave Tucker's key points re: Sunrise staff methodology 2.00	\$950.00	2	\$1,900.00								
2/24/2021	David Marks	GoToMeeting with Attorney Thornton re: Lacey depo prep/key testimony regarding Sunrise time standards; exhibits; Sunrise workload; Sunrise staffing model 4.60	\$950.00	4.6	\$4,370.00								
2/24/2021	David Marks	Teleconference with Attorneys Thornton, Healey and Umpierre re: Lacey depo points 1.30	\$950.00	1.3	\$1,235.00								
2/24/2021	David Marks	Review key exhibits for use in Lacey depo 1.70	\$950.00	1.7	\$1,615.00								
2/24/2021	Jim Thornton	Work on task time section of Lacey outline 2.3	\$500.00	2.3	\$1,150.00								
2/24/2021	Jim Thornton	Work with David Marks on GoToMeeting regarding Lacey depo prep 4.6	\$500.00	4.6	\$2,300.00								
2/24/2021	Jim Thornton	Call with David Marks, Chris Healey, Brian Umpierre regarding Lacey depo points 1.3	\$500.00	1.3	\$650.00								
2/24/2021	Jim Thornton	Calls and emails with Blake Peters regarding service code key rules and 2-step encoding of bathing and diabetes tasks .3	\$500.00	0.3	\$150.00								
2/24/2021	Jim Thornton	Emails to Dr. Cristina Flores and Dale Schroyer regarding docs to review .2	\$500.00	0.2	\$100.00								
2/24/2021	Jim Thornton	Pulled docs for depo prep .4	\$500.00	0.4	\$200.00								
2/24/2021	Jim Thornton	Review of David Tucker list of potential questions related to Sunrise time study .3	\$500.00	0.3	\$150.00								
2/25/2021	David Marks	Multiple GoToMeetings and teleconferences with Attorney Thornton re: prep questions, depo exhibits for Ann Lacey depo, statistical analysis by D. Schroyer of Sunrise staffing information 12.6	\$950.00	12.6	\$11,970.00		12.6	\$11,970.00					
2/25/2021	David Marks	Call to D. Schroyer regarding his statistical analysis .3	\$950.00	0.3	\$285.00								
2/25/2021	David Marks	Organize/prepare final exhibits and rearrange depo structure. 2.0	\$950.00	2	\$1,900.00								
2/25/2021	Jim Thornton	Work with David Marks and Dale Schroyer and Dave Tucker regarding statistical aspect of Lacey examination 3.8	\$500.00	3.8	\$1,900.00								
2/25/2021	Jim Thornton	Work on pull and prep of exhibits for use in Lacey depo and sent same to Brian Umpierre 2.3	\$500.00	2.3	\$1,150.00								
2/25/2021	Jim Thornton	Various calls from David Marks regarding to do list .4	\$500.00	0.4	\$200.00								
2/25/2021	Jim Thornton	Final GoToMeeting depo prep session with David Marks including calls w/David Marks and Dale Schroyer regarding various issues 9.1	\$500.00	9.1	\$4,550.00		9.1	\$4,550.00					
2/26/2021	David Marks	Before start of deposition, provide Dianne Asher with final edits to Ann Lacey depo outline plus integrate Attorney Thornton's final key points 1.40	\$950.00	1.4	\$1,330.00								
2/26/2021	David Marks	Attend and question Ann Lacey during depo including various teleconferences with Attorney J. Thornton during depo breaks and after depo 9.40	\$950.00	9.4	\$8,930.00		9.4	\$8,930.00					
2/26/2021	Diane Asher	Draft edits to Ann Lacey depo outline with outside suggestions	\$85.00	1	\$85.00								
2/26/2021	Jim Thornton	Finalized depo outline and sent to David Marks 1.3	\$500.00	1.3	\$650.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
2/26/2021	Jim Thornton	Attended depo of Ann Lacey and work with David Marks regarding same [9.4]	\$500.00	9.4	\$4,700.00		9.4	\$4,700.00					
2/26/2021	Jim Thornton	Numerous emails to parties and court reporters with Exhibits 166-178, screenshares [.2]	\$500.00	0.2	\$100.00								
2/26/2021	Jim Thornton	Numerous calls with David Marks, Dale Schroyer and others regarding testimony [.2]	\$500.00	0.2	\$100.00								
2/27/2021	David Marks	Compose email to CA Team transmitting key of Lacey depo points [.30]	\$950.00	0.3	\$285.00								
2/28/2021	David Marks	Compose email to CA Team transmitting additional key depo points [.40]	\$950.00	0.4	\$380.00								
2/28/2021	Jim Thornton	Multiple emails regarding depo follow ups with David Marks [.5]	\$500.00	0.5	\$250.00								
2/28/2021	Jim Thornton	Sent all Lacey depo exhibits to Chris Healey [.4]	\$500.00	0.4	\$200.00								
2/28/2021	Jim Thornton	Began work on a 30b6 designation [.9]	\$500.00	0.9	\$450.00								
3/1/2021	David Marks	Organize depo file/exhibits and post-mortem thoughts on Lacey depo [.30]	\$950.00	0.3	\$285.00								
3/1/2021	David Marks	GoToMeeting with Attorney Thornton to discuss 30(b)(6) topics based on review of Lacey depo notes regarding key questions and information needed and persons with knowledge of key subject areas. Draft 30(b)(6) topics [3.10]	\$950.00	3.1	\$2,945.00								
3/1/2021	David Marks	RR Attorney J. Thornton 30(b)(6) draft and revise same based on Lacey depo notes. [2.20]	\$950.00	2.2	\$2,090.00								
3/1/2021	David Marks	Teleconference with Attorneys Johnson, Healey, and Thornton regarding Lacey post-mortem depo and need for 30(b)(6) [1.30]	\$950.00	1.3	\$1,235.00								
3/1/2021	David Marks	Draft additional list of items to include in new 30(b)(6) [.60]	\$950.00	0.6	\$570.00								
3/1/2021	David Marks	Compose email to CA Team regarding same [.10]	\$950.00	0.1	\$95.00								
3/1/2021	Diane Asher	Assist in drafting 30(b)(6) NOD	\$85.00	1.2	\$102.00								
3/1/2021	Jim Thornton	Work on draft 30b6 notice and sent to David Marks [1.8]	\$500.00	1.8	\$900.00								
3/1/2021	Jim Thornton	GoToMeeting w/David Marks regarding draft 30b6 notice including emails to Dale Schroyer and Brian Umpierre locating docs [3.1]	\$500.00	3.1	\$1,550.00								
3/1/2021	Jim Thornton	Conference call w/team regarding Lacey depo and 30b6 plan [1.3]	\$500.00	1.3	\$650.00				1.3	650			
3/1/2021	Jim Thornton	Calls w/Dale Schroyer regarding 25% percentile questions [.3]	\$500.00	0.3	\$150.00								
3/2/2021	David Marks	Receipt and review email from Attorney Johnson to Sunrise transmitting service copy of depo notice for Sunrise pursuant to 30(b)(6) set for 3.22.21 [.20]	\$950.00	0.2	\$190.00								
3/3/2021	David Marks	Work on To Do list and planning [.10]	\$950.00	0.1	\$95.00								
3/3/2021	David Marks	Teleconference with Attorney Thornton regarding Sunrise to do list in connection with 30(b)(6) [.30]	\$950.00	0.3	\$285.00								
3/3/2021	David Marks	GoToMeeting with Attorney Thornton regarding review of Sunrise's CLM calculations/formula for helper hours [.30]	\$950.00	0.3	\$285.00								
3/3/2021	Jim Thornton	Call and GoToMeeting w/Dale Schroyer regarding status of sims and understanding of CLM [1.5]	\$500.00	1.5	\$750.00								
3/3/2021	Jim Thornton	Call w/Chris Healey regarding CLM [.8]	\$500.00	0.8	\$400.00								
3/3/2021	Jim Thornton	Calls and GoToMeeting w/David Marks regarding CLM inspection and to do list [.5]	\$500.00	0.5	\$250.00								
3/4/2021	David Marks	Teleconference with Attorney Thornton regarding CLM analysis - find slides regarding DCM vs. helper hours [.20]	\$950.00	0.2	\$190.00								
3/4/2021	David Marks	Teleconference with Attorney Healey regarding depo targets (Tiffany Nobbee) [.70]	\$950.00	0.7	\$665.00								

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						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
3/4/2021	David Marks	Teleconference with Attorney Thornton regarding Schroyer status and To Dos to pull peak times .60	\$950.00	0.6	\$570.00								
3/4/2021	David Marks	Compose email to Dr. Mark Lachs regarding urinary frequency in elderly .20	\$950.00	0.2	\$190.00								
3/4/2021	Jim Thornton	Work with Dale Schroyer regarding status of sim .3	\$500.00	0.3	\$150.00								
3/4/2021	Jim Thornton	Call with David Marks regarding various to do tasks .2	\$500.00	0.2	\$100.00								
3/4/2021	Jim Thornton	Call with David Marks updating him as to Schroyer status, To Dos, pulling peak times .6	\$500.00	0.6	\$300.00								
3/5/2021	David Marks	Receipt and review email from Sunrise counsel, Attorney Joseph Gorman, regarding response/objections to Plaintiff's 30(b) 6 depo notice .20	\$950.00	0.2	\$190.00								
3/5/2021	David Marks	Teleconference with Attorney Thornton re: Ginder depo and other discovery issues .30	\$950.00	0.3	\$285.00								
3/5/2021	Jim Thornton	Call from David Marks regarding Ginder depo and other discovery issues .3	\$500.00	0.3	\$150.00								
3/8/2021	David Marks	Review Nobbee emails .20	\$950.00	0.2	\$190.00								
3/8/2021	David Marks	Teleconference to Attorney Thornton regarding final depo choice between Nobbee than Ginder, peak time hours, gather all emails regarding peak time hour emails .80	\$950.00	0.8	\$760.00								
3/8/2021	David Marks	Compose email to Attorney Healey regarding choosing between Nobbee vs. Ginder for remaining depo .10	\$950.00	0.1	\$95.00								
3/8/2021	David Marks	Teleconference to Attorney Thornton discussing Sunrise To Do regarding CLM final formula and Dr. Rich Feldman .70	\$950.00	0.7	\$665.00								
3/8/2021	David Marks	Receipt and review email from Attorney Thornton regarding Sunrise PowerPoint slide SUN0112099, "OurCareManagers' Reality" .20	\$950.00	0.2	\$190.00								
3/8/2021	David Marks	Receipt and review email from Attorney Umpierre enclosing draft response to Sunrise counsel, Attorney Joseph Gorman's response/objections to Plaintiff's 30(b) 6 depo notice .20	\$950.00	0.2	\$190.00								
3/8/2021	David Marks	Receipt and review multiple emails from Attorney Healey regarding his draft response to Sunrise response/objections to Plaintiff's 30(b) 6 depo notice .30	\$950.00	0.3	\$285.00								
3/8/2021	David Marks	Compose email to Attorneys Healey and Umpierre regarding suggestions to same .20	\$950.00	0.2	\$190.00								
3/8/2021	Jim Thornton	Call from David Marks regarding hourly staffing analysis and peak hours at Sunrise and census issues .3	\$500.00	0.3	\$150.00								
3/8/2021	Jim Thornton	Multiple calls with Blake Peters regarding census matters and David Marks's request regarding hourly staffing analysis, review of multiple peak hour documents .3	\$500.00	0.3	\$150.00								
3/8/2021	Jim Thornton	Work on census issues and updated assessment based census versus SUN0024473 Daily Census Data .4	\$500.00	0.4	\$200.00								
3/8/2021	Jim Thornton	Prepared a list of Steps and Questions related to how CLM works and sent to Dale Schroyer for review 2.4	\$500.00	2.4	\$1,200.00								
3/8/2021	Jim Thornton	Email to Richard Feldman regarding availability to discuss sim and extrapolation questions .2	\$500.00	0.2	\$100.00								
3/8/2021	Jim Thornton	Call w/David Marks regarding CLM Steps and Questions .2	\$500.00	0.2	\$100.00								
3/8/2021	Jim Thornton	Call with David Marks regarding CLM final formula and Dr. Rich Feldman .7	\$500.00	0.7	\$350.00								
3/9/2021	David Marks	Review daily census discrepancy and compose email to CA Team regarding same .50	\$950.00	0.5	\$475.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>			<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
<u>Fees</u>														
3/9/2021	David Marks	Teleconference to Attorney Thornton to discuss assessment based census vs. SUN0024473 census [.40]	\$950.00	0.4		\$380.00								
3/9/2021	David Marks	Revise Attorney Umpierre's proposed email regarding missing census and assessments [.10]	\$950.00	0.1		\$95.00								
3/9/2021	David Marks	Compose email to CA Team regarding same [.10]	\$950.00	0.1		\$95.00								
3/9/2021	David Marks	Review draft motion for additional depositions from Attorney Healey [.20]	\$950.00	0.2		\$190.00								
3/9/2021	David Marks	Receipt, review, and approve depo approach 4 key witnesses in lieu of 30(b)(6) [.10]	\$950.00	0.1		\$95.00								
3/9/2021	David Marks	Teleconference with Attorney C. Healey regarding discrepancy between assessments and census data [.20]	\$950.00	0.2		\$190.00								
3/9/2021	Jim Thornton	Received and reviewed Dale Schroyer edits to how CLM works spreadsheet and incorporated his changes [.3]	\$500.00	0.3		\$150.00								
3/9/2021	Jim Thornton	Emails with Rich Feldman regarding setting up call [.1]	\$500.00	0.1		\$50.00								
3/9/2021	Jim Thornton	Emails with Dale Schroyer and Blake Peters regarding service code application [.2]	\$500.00	0.2		\$100.00								
3/9/2021	Jim Thornton	Call with Tracy Myrick regarding census disconnect project [.4]	\$500.00	0.4		\$200.00								
3/9/2021	Jim Thornton	Call w/David Marks regarding status of various projects [.2]	\$500.00	0.2		\$100.00								
3/9/2021	Jim Thornton	Work on email with David Marks regarding census project [.3]	\$500.00	0.3		\$150.00								
3/9/2021	Jim Thornton	Requested Blake Peters create listing of unique resident IDs for 6 sample facilities [.2]	\$500.00	0.2		\$100.00								
3/9/2021	Jim Thornton	Emails with BL and texts with Dale Schroyer regarding CLM review [.1]	\$500.00	0.1		\$50.00								
3/9/2021	Jim Thornton	Per Brian Umpierre request work on census issue email and sent to David Marks for further review [.9]	\$500.00	0.9		\$450.00								
3/9/2021	Jim Thornton	Calls with Rich Feldman regarding review of model and extrapolation [.5]	\$500.00	0.5		\$250.00								
3/10/2021	David Marks	GoToMeeting with Attorney Thornton to discuss and review Attorney Healey email regarding status of ProModel analysis [1.30]	\$950.00	1.3		\$1,235.00								
3/10/2021	David Marks	Teleconference to B. Peters regarding simple math comparison between Aegis and Sunrise, and regarding peak staffing [.60]	\$950.00	0.6		\$570.00								
3/10/2021	David Marks	GoToMeeting with Attorney Thornton, Dale Tucker, Dale Schroyer, and Kurt Shampine regarding status of simulation and focus on workload [2.20]	\$950.00	2.2		\$2,090.00								
3/10/2021	David Marks	Teleconference w/ Attorney Thornton regarding deadlines/calendar items [.20]	\$950.00	0.2		\$190.00								
3/10/2021	Jim Thornton	Call w/David Marks regarding deadlines and sent David Marks calendar items [.2]	\$500.00	0.2		\$100.00								
3/10/2021	Jim Thornton	Confirmed availability for CLM review with Brian Umpierre [.1]	\$500.00	0.1		\$50.00								
3/10/2021	Jim Thornton	GoToMeeting w/David Marks regarding timing of results [1.3]	\$500.00	1.3		\$650.00								
3/10/2021	Jim Thornton	Prepared and sent listing of unique resident IDs to Tracy Myrick to compare to .pdf assessments [.6]	\$500.00	0.6		\$300.00								
3/10/2021	Jim Thornton	GoToMeeting with MedModel team-Kurt Shampine, Dave Tucker, Dale Schroyer-and David Marks discussing steps to ensure model accuracy [2.2]	\$500.00	2.2		\$1,100.00								
3/10/2021	Jim Thornton	Work on frequency drill down questions related to service code key [1.3]	\$500.00	1.3		\$650.00								
3/11/2021	David Marks	Review missing assessments, Part 3 [.20]	\$950.00	0.2		\$190.00								
3/11/2021	David Marks	Teleconference with B. Peters to discuss recreating spreadsheet to send to Attorney Umpierre [1.00]	\$950.00	1		\$950.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
3/11/2021	David Marks	Receipt and review Attorney Umpierre's request for explanation as to missing assessments/assessments based on census .10	\$950.00	0.1	\$95.00								
3/11/2021	David Marks	Review and discuss Diane's edits to B. Peters' census discrepancy spreadsheet .20	\$950.00	0.2	\$190.00								
3/11/2021	David Marks	Compose email to Attorney Umpierre explaining discrepancy in census .50	\$950.00	0.5	\$475.00								
3/11/2021	Jim Thornton	Call w/Blake Peters regarding service code question .1	\$500.00	0.1	\$50.00								
3/12/2021	Jim Thornton	Received CLM document from Brian Umpierre and forwarded to Dale Schroyer for further review .1	\$500.00	0.1	\$50.00								
3/12/2021	Jim Thornton	Email from Rich Feldman regarding once per room tasks and responded to same .1	\$500.00	0.1	\$50.00								
3/15/2021	David Marks	Teleconference with Attorney Thornton regarding Tracy Myrick's email and question regarding census data .4	\$950.00	0.4	\$380.00								
3/15/2021	David Marks	Draft email explaining problem with finding more .pdf files vs .csv data .5	\$950.00	0.5	\$475.00								
3/15/2021	Jim Thornton	Review of CLM doc from Brian Umpierre .2	\$500.00	0.2	\$100.00								
3/15/2021	Jim Thornton	Work on census issues and .csv versus .pdf data and sent explanatory email to David Marks and Blake Peters regarding same .9	\$500.00	0.9	\$450.00								
3/15/2021	Jim Thornton	W/on PPD calculation and census impact example .2	\$500.00	0.2	\$100.00								
3/15/2021	Jim Thornton	GoToMeeting w/Blake Peters regarding sunrise assessment data and PPD calculations .6	\$500.00	0.6	\$300.00								
3/15/2021	Jim Thornton	Work on analysis of service code key looking for redundancies .5	\$500.00	0.5	\$250.00								
3/15/2021	Jim Thornton	Multiple calls with Blake Peters regarding service code key and creating deep dive data set for Dr. Cristina Flores .6	\$500.00	0.6	\$300.00								
3/15/2021	Jim Thornton	Set up Wednesday call with Dr. Cristina Flores .2	\$500.00	0.2	\$100.00								
3/15/2021	Jim Thornton	Prepared 2 test set of inputs for Dale Schroyer to test impact of oral care and priorities .5	\$500.00	0.5	\$250.00								
3/15/2021	Jim Thornton	GoToMeeting w/Rich Feldman regarding Sunrise model review .8	\$500.00	0.8	\$400.00								
3/15/2021	Jim Thornton	GoToMeeting w/David Marks regarding census issues and .csv versus .pdf data and email to California team .9	\$500.00	0.9	\$450.00								
3/16/2021	David Marks	GoToMeeting with Attorney Thornton regarding analysis of .PDF assessments vs. .csv assessments .50	\$950.00	0.5	\$475.00								
3/16/2021	David Marks	RR email/data from Attorney J. Thornton re: missing assessments-reported census does not match count of resident assessments .40	\$950.00	0.4	\$380.00								
3/16/2021	David Marks	Teleconference with Attorneys Healey, Umpierre, Thornton, and Johnson regarding discrepancy in .PDF assessments vs. .csv assessments, and sent spreadsheet analysis to same 1.0	\$950.00	1	\$950.00								
3/16/2021	Jim Thornton	Received and reviewed 1st set of notes from Feldman .4	\$500.00	0.4	\$200.00								
3/16/2021	Jim Thornton	Sent link to Dale Schroyer and texts w/Dale Schroyer regarding notes from Feldman's review of the model .2	\$500.00	0.2	\$100.00								
3/16/2021	Jim Thornton	Quick update to David Marks regarding same .1	\$500.00	0.1	\$50.00								
3/16/2021	Jim Thornton	Pulled the dates related to the resident identifiers that only appear in the .pdf version of the assessment/CP data and sent to David Marks 1.2	\$500.00	1.2	\$600.00								
3/16/2021	Jim Thornton	Responded to Tracy Myrick email regarding resident ID project .2	\$500.00	0.2	\$100.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
3/16/2021	Jim Thornton	Call from Blake Peters regarding counts and inclusion of bundled services .2	\$500.00	0.2	\$100.00								
3/16/2021	Jim Thornton	Call with David Marks and GoToMeeting regarding deeper analysis of dates relating to missing resident IDs .5	\$500.00	0.5	\$250.00								
3/16/2021	Jim Thornton	Conference call with California team and David Marks regarding census issues 1.0	\$500.00	1	\$500.00			1	500				
3/17/2021	David Marks	GoToMeeting with Attorney Thornton regarding the census and assessment discrepancy, and status of model results 1.70	\$950.00	1.7	\$1,615.00								
3/17/2021	David Marks	Receipt and review Tracy Myrick's analysis of Sunrise .PDF assessments .20	\$950.00	0.2	\$190.00								
3/17/2021	Jim Thornton	Received and reviewed listing of unique resident IDs in .csv compared to .pdf versions from TM .2	\$500.00	0.2	\$100.00								
3/17/2021	Jim Thornton	Received and reviewed deep dive resident needs spreadsheet from Blake Peters and performed QA testing of per assessment daily minutes .4	\$500.00	0.4	\$200.00								
3/17/2021	Jim Thornton	Called Blake Peters regarding issue in calculations .2	\$500.00	0.2	\$100.00								
3/17/2021	Jim Thornton	GoToMeeting w/David Marks regarding census issue and draft email of questions 1.7	\$500.00	1.7	\$850.00								
3/17/2021	Jim Thornton	GoToMeeting w/Dr. Cristina Flores, Blake Peters and Dale Schroyer regarding service codes, rules, bundling, priorities 2.2	\$500.00	2.2	\$1,100.00								
3/17/2021	Jim Thornton	GoToMeeting w/Dale Schroyer regarding box plots of staffing hours .4	\$500.00	0.4	\$200.00								
3/17/2021	Jim Thornton	Work on downloaded 5GB worth of assessment data from Tracy Myrick .3	\$500.00	0.3	\$150.00								
3/17/2021	Jim Thornton	Email to Tracy Myrick regarding confirming assessment data .1	\$500.00	0.1	\$50.00								
3/18/2021	Jim Thornton	Work on pulling dates related to .pdf assessments/care plans for 5 sample facilities 6.6	\$500.00	6.6	\$3,300.00	6.6	\$3,300.00						
3/18/2021	Jim Thornton	Prepared summary and sent to David Marks and Blake Peters .4	\$500.00	0.4	\$200.00								
3/19/2021	David Marks	Review of 2 spreadsheets regarding discrepancy in .PDF vs. .txt assessment data for 6 sample facilities .40	\$950.00	0.4	\$380.00								
3/19/2021	David Marks	GoToMeeting with Attorney Thornton regarding same, and regarding revision of questions to Sunrise 1.60	\$950.00	1.6	\$1,520.00								
3/19/2021	David Marks	Teleconference with Attorney Thornton re: status of projects 0.40	\$950.00	0.4	\$380.00								
3/19/2021	Jim Thornton	GoToMeeting with Blake Peters regarding census issues and data from Blake Peters .7	\$500.00	0.7	\$350.00								
3/19/2021	Jim Thornton	Work on draft of email regarding census issues with .csv versus .pdf and sent to David Marks 1.7	\$500.00	1.7	\$850.00								
3/19/2021	Jim Thornton	Email to Mark Johnson regarding status of project .1	\$500.00	0.1	\$50.00								
3/19/2021	Jim Thornton	GoToMeeting w/David Marks regarding finalizing email to California team regarding .pdf versus .csv 1.6	\$500.00	1.6	\$800.00								
3/19/2021	Jim Thornton	Email to Dr. Cristina Flores and Blake Peters w/link to San Mateo assessments/care plans for possible extraction project .2	\$500.00	0.2	\$100.00								
3/19/2021	Jim Thornton	Call with David Marks regarding status of projects .4	\$500.00	0.4	\$200.00								
3/19/2021	Jim Thornton	Call with Mark Johnson and Chris Healey regarding stipulation and emails regarding outstanding data issues .4	\$500.00	0.4	\$200.00								
3/19/2021	Jim Thornton	Work on revision to email and analysis for possible use .3	\$500.00	0.3	\$150.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
3/22/2021	David Marks	Teleconference with Attorney Thornton regarding update on missing assessment project (outcome of Friday conference call) .10	\$950.00	0.1	\$95.00								
3/22/2021	Jim Thornton	Call from David Marks regarding call last Friday about census .2	\$500.00	0.2	\$100.00								
3/22/2021	Jim Thornton	Work on rules for application of service code key based on call with DF, Dale Schroyer and Blake Peters 1.9	\$500.00	1.9	\$950.00								
3/22/2021	Jim Thornton	GoToMeeting with Blake Peters regarding confirming understanding of service code key .8	\$500.00	0.8	\$400.00								
3/22/2021	Jim Thornton	Email Blake Peters updated rules .1	\$500.00	0.1	\$50.00								
3/23/2021	Jim Thornton	Work on Rubik's cube of testing-layout and plan 2.1	\$500.00	2.1	\$1,050.00								
3/23/2021	Jim Thornton	Review of latest production from Sunrise and report to California team regarding contents .7	\$500.00	0.7	\$350.00								
3/23/2021	Jim Thornton	Scheduled call with Dr. Cristina Flores for Thursday .1	\$500.00	0.1	\$50.00								
3/24/2021	David Marks	Receipt of email from Attorney Thornton re: production and data coming from Sunrise .10	\$950.00	0.1	\$95.00								
3/24/2021	David Marks	Teleconference with Attorney Thornton regarding the same .10	\$950.00	0.1	\$95.00								
3/24/2021	Jim Thornton	Email updated rules for service code key application to Blake Peters .1	\$500.00	0.1	\$50.00								
3/24/2021	Jim Thornton	Email to and call from David Marks regarding production and data coming from Sunrise .2	\$500.00	0.2	\$100.00								
3/24/2021	Jim Thornton	Email to California team regarding move-out data reminder and hopes that data will be produced .2	\$500.00	0.2	\$100.00								
3/24/2021	Jim Thornton	Work on Rubik's cube of testing .5	\$500.00	0.5	\$250.00								
3/24/2021	Jim Thornton	Emails and calls with Blake Peters and Brian Umpierre regarding Gorman issues .7	\$500.00	0.7	\$350.00								
3/24/2021	Jim Thornton	Emails with Richard Feldman regarding status .1	\$500.00	0.1	\$50.00								
3/25/2021	Jim Thornton	Call with Dr. Cristina Flores regarding San Mateo .pdfs .2	\$500.00	0.2	\$100.00								
3/25/2021	Jim Thornton	Calls with Blake Peters regarding rules and handling of oral care/observe and report .2	\$500.00	0.2	\$100.00								
3/29/2021	Jim Thornton	Emails w/Blake Peters regarding comparison of latest assessment data to original production .3	\$500.00	0.3	\$150.00								
3/29/2021	Jim Thornton	Sent missing assessment list to Blake Peters .1	\$500.00	0.1	\$50.00								
3/30/2021	Jim Thornton	Received and reviewed 4 sets of PDFs with resident IDs--reviewed same and responded to David Marks .3	\$500.00	0.3	\$150.00								
3/31/2021	David Marks	RR email from Attorney J. Thornton re: 4 sets of .pdfs with resident IDs .10	\$950.00	0.1	\$95.00								
3/31/2021	David Marks	Teleconference with Attorney Thornton regarding billing history cross-over table .10	\$950.00	0.1	\$95.00								
3/31/2021	David Marks	Compose email to Attorney Umpierre regarding cross-over table for billing history vs. assessment and review of response attachment .30	\$950.00	0.3	\$285.00								
3/31/2021	David Marks	Teleconference with Attorneys Healey, Umpierre, and Johnson regarding status of assessment production by Sunrise .30	\$950.00	0.3	\$285.00								
3/31/2021	David Marks	Teleconference with B. Peters regarding status of missing billing history (IDs match to assessment IDs) .40	\$950.00	0.4	\$380.00								
3/31/2021	David Marks	Compose email to CA Team regarding missing billing history IDs vs. assessment IDs for San Mateo/San Rafael .10	\$950.00	0.1	\$95.00								
3/31/2021	Jim Thornton	GoToMeeting w/Blake Peters regarding data analysis .3	\$500.00	0.3	\$150.00								

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						<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
3/31/2021	Jim Thornton	Call with David Marks regarding billing history cross-over table .1	\$500.00	0.1	\$50.00								
4/1/2021	David Marks	Review updated audit of Sunrise production of assessment data, billing service history and move out data, and summarize missing data for purpose of inclusion in MTC and sent same to CA Team .60	\$950.00	0.6	\$570.00								
4/1/2021	David Marks	Teleconferences with Attorney J. Thornton re: missing data .20	\$950.00	0.2	\$190.00								
4/1/2021	David Marks	GoToMeeting with Attorney Thornton regarding same .70	\$950.00	0.7	\$665.00								
4/1/2021	Jim Thornton	Multiple GoToMeeting with Blake Peters regarding data analysis related to resident IDs without .txt assessment data, LOA/move-out data, or BSH data 1.5	\$500.00	1.5	\$750.00								
4/1/2021	Jim Thornton	Work on revamping/rearranging Blake Peter's analysis and creating email to address 5 areas of concern 3.8	\$500.00	3.8	\$1,900.00								
4/1/2021	Jim Thornton	Calls from David Marks regarding analysis .2	\$500.00	0.2	\$100.00								
4/1/2021	Jim Thornton	GoToMeeting w/David Marks regarding email to California team .7	\$500.00	0.7	\$350.00								
4/5/2021	Jim Thornton	Modified rules for service code key and sent to Blake Peters .4	\$500.00	0.4	\$200.00								
4/5/2021	Jim Thornton	Work on updated global expert inputs and sent to Dale Schroyer for use in testing .5	\$500.00	0.5	\$250.00								
4/6/2021	David Marks	Teleconference with Attorney Thornton regarding status report for ProModel and new data from Sunrise .40	\$950.00	0.4	\$380.00								
4/6/2021	Jim Thornton	Call with David Marks updating him as to ProModel testing status and new data from Sunrise .4	\$500.00	0.4	\$200.00								
4/7/2021	Jim Thornton	GoToMeeting w/ Dr. Flores regarding task times .7	\$500.00	0.7	\$350.00								
4/7/2021	Jim Thornton	Work on Rubik's cube set-up 1.2	\$500.00	1.2	\$600.00								
4/7/2021	Jim Thornton	Texts with Dale Schroyer regarding inputs and sent same to Dale Schroyer 2.5	\$500.00	2.5	\$1,250.00								
4/7/2021	Jim Thornton	Work on another pass through service code key and various updates-sent to Blake Peters 2.4	\$500.00	2.4	\$1,200.00								
4/8/2021	Jim Thornton	GoToMeetings with Blake Peters regarding rules and service code key .6	\$500.00	0.6	\$300.00								
4/8/2021	Jim Thornton	Work on updated service code .5	\$500.00	0.5	\$250.00								
4/8/2021	Jim Thornton	GoToMeeting w/ Dale Schroyer regarding Rubik's cube testing .9	\$500.00	0.9	\$450.00								
4/8/2021	Jim Thornton	Work on Rubik's cube global expert inputs .8	\$500.00	0.8	\$400.00								
4/8/2021	Jim Thornton	Review of service codes and QA .8	\$500.00	0.8	\$400.00								
4/8/2021	Jim Thornton	Emailed latest set of service codes and unique rows to Dr. Cristina Flores for her review .3	\$500.00	0.3	\$150.00								
4/9/2021	Jim Thornton	Work on Rubik's cube global expert inputs 2.7	\$500.00	2.7	\$1,350.00								
4/9/2021	Jim Thornton	Work on Alta Loma daily data with all staffing and residents set to AL .5	\$500.00	0.5	\$250.00								
4/9/2021	Jim Thornton	Calls with Dale Schroyer .2	\$500.00	0.2	\$100.00								
4/9/2021	Jim Thornton	Calls with Blake Peters regarding changes to service codes .2	\$500.00	0.2	\$100.00								
4/10/2021	David Marks	Teleconference with Attorney Thornton regarding status of testing 0.30	\$950.00	0.3	\$285.00								
4/10/2021	Jim Thornton	Call with David Marks regarding status of testing .3	\$500.00	0.3	\$150.00								
4/12/2021	Jim Thornton	GoToMeeting w/ Dr. Flores regarding task times .6	\$500.00	0.6	\$300.00								
4/12/2021	Jim Thornton	Work on Rubik's cube testing set up for multiple tests 1.7	\$500.00	1.7	\$850.00								
4/12/2021	Jim Thornton	Updating task times to include Sunrise's own times and sent to Dr. Cristina Flores 2.9	\$500.00	2.9	\$1,450.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked		General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
4/12/2021	Jim Thornton	Call with Blake Peters and emails with Blake Peters regarding rules/service codes .3	\$500.00	0.3	\$150.00								
4/12/2021	Jim Thornton	Calls with Dale Schroyer re: testing .2	\$500.00	0.2	\$100.00								
4/12/2021	Jim Thornton	Work on conceptualizing scheduling spreadsheet .5	\$500.00	0.5	\$250.00								
4/13/2021	David Marks	Confirm with B. Peters that Alta Loma inputs for Rubik's cube testing have been sent to Dale Schroyer and all are in his possession .30	\$950.00	0.3	\$285.00								
4/13/2021	Jim Thornton	Texts from Dale Schroyer regarding revisions needed for testing/work on same .4	\$500.00	0.4	\$200.00								
4/13/2021	Jim Thornton	Work on Rubik's cube testing set up for multiple tests 2.7	\$500.00	2.7	\$1,350.00								
4/13/2021	Jim Thornton	W/on scheduler and creating schedule spreadsheets 2.1	\$500.00	2.1	\$1,050.00								
4/14/2021	Jim Thornton	Work on Table of DES Testing and Results-Rubik's cube 1.8	\$500.00	1.8	\$900.00								
4/15/2021	Jim Thornton	Check on status of testing with Dale Schroyer .2	\$500.00	0.2	\$100.00								
4/16/2021	Jim Thornton	Received and reviewed results of testing. .6	\$500.00	0.6	\$300.00								
4/16/2021	Jim Thornton	GoToMeeting w/Dale Schroyer regarding Rubik's cube testing and results .9	\$500.00	0.9	\$450.00								
4/18/2021	David Marks	Review status of ProModel Alta Loma Rubik's cube testing .10	\$950.00	0.1	\$95.00								
4/18/2021	David Marks	GoToMeeting with Attorney Thornton regarding specific Rubik's cube testing and status of same 1.00	\$950.00	1	\$950.00								
4/18/2021	David Marks	Compose email to CA Team regarding same .10	\$950.00	0.1	\$95.00								
4/18/2021	Jim Thornton	GoToMeeting w/David Marks regarding Rubik's testing to date and brief update email to California Team 1.0	\$500.00	1	\$500.00								
4/19/2021	David Marks	RR email from J. Thornton updating status of Rubik's testing .10	\$950.00	0.1	\$95.00								
4/19/2021	Jim Thornton	Work on additional Rubik's cube tests 2.3	\$500.00	2.3	\$1,150.00								
4/19/2021	Jim Thornton	Texts from and to Dale Schroyer regarding testing .2	\$500.00	0.2	\$100.00								
4/19/2021	Jim Thornton	Emails with California team and David Marks regarding scheduling .2	\$500.00	0.2	\$100.00								
4/20/2021	Jim Thornton	Texts with Dale Schroyer about schedule .1	\$500.00	0.1	\$50.00								
4/20/2021	Jim Thornton	Emails with Dr. Cristina Flores regarding scheduling review with California team .2	\$500.00	0.2	\$100.00								
4/21/2021	Jim Thornton	GoToMeeting w/Dr. Cristina Flores regarding status of Rubik's testing and set 3 task times 1.2	\$500.00	1.2	\$600.00								
4/21/2021	Jim Thornton	Work on and sent Dr. Cristina Flores latest GEI spreadsheet for review .6	\$500.00	0.6	\$300.00								
4/22/2021	Jim Thornton	Work with Dale Schroyer regarding Rubik's cube testing of remaining sample facilities and schedule .3	\$500.00	0.3	\$150.00								
4/22/2021	Jim Thornton	Created subset of Rubik's series for Dale Schroyer use in advance of next week's roundtable 1.4	\$500.00	1.4	\$700.00								
4/22/2021	Jim Thornton	Work on creating double staffing and only half-staffing version of facility inputs for Rubik's cube testing and provided to Dale Schroyer .6	\$500.00	0.6	\$300.00								
4/23/2021	Jim Thornton	Texts and calls with Dale Schroyer and Blake Peters regarding facility inputs for Beverly Hills and work on same .4	\$500.00	0.4	\$200.00								
4/23/2021	Jim Thornton	Work on revisions to schedule section of 3.34 service code in all global expert inputs 1.0	\$500.00	1	\$500.00								
4/23/2021	Jim Thornton	Created brief DES testing status list in advance of next weeks call .2	\$500.00	0.2	\$100.00								
4/26/2021	David Marks	Teleconference with Attorney Thornton regarding update on simulation analysis and Rubik's cube for 6 sample facilities .20	\$950.00	0.2	\$190.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
4/26/2021	Jim Thornton	Calls with Blake Peters regarding Monterey issue and Beverly Hills census questions [.3]	\$500.00	0.3		\$150.00								
4/26/2021	Jim Thornton	Calls and texts with Dale Schroyer regarding Monterey [.2]	\$500.00	0.2		\$100.00								
4/26/2021	Jim Thornton	Work on updating Monterey halved and doubled for Dale Schroyer use [.4]	\$500.00	0.4		\$200.00								
4/26/2021	Jim Thornton	Work on Beverly Hills census question [.4]	\$500.00	0.4		\$200.00								
4/26/2021	Jim Thornton	Updated David Marks on status [.2]	\$500.00	0.2		\$100.00								
4/26/2021	Jim Thornton	Review of and emails with Dr. Cristina Flores regarding latest set of task times [.7]	\$500.00	0.7		\$350.00								
4/27/2021	Jim Thornton	GoToMeeting w/ Dr. Cristina Flores regarding task times [.6]	\$500.00	0.6		\$300.00								
4/27/2021	Jim Thornton	Work on rescheduling meeting on Rubik's [.3]	\$500.00	0.3		\$150.00								
4/27/2021	Jim Thornton	Received and reviewed multiple emails regarding DES testing and inputs [.2]	\$500.00	0.2		\$100.00								
4/27/2021	Jim Thornton	Received and reviewed years worth of DES testing data for use for each of 6 homes [.3]	\$500.00	0.3		\$150.00								
4/28/2021	David Marks	GoToMeeting with Attorney Thornton and S. Meachen re: table of DES testing and slides for presentation [1.70]	\$950.00	1.7		\$1,615.00								
4/28/2021	Sterling Meachen	Prepare slide presentation dubbed 'Roundtable Presentation' [3.3]	\$225.00	3.3		\$742.50								
4/28/2021	Sterling Meachen	Revisited previous presentation set of slides [.3]	\$225.00	0.3		\$67.50								
4/28/2021	Jim Thornton	GoToMeeting w/David Marks and Sterling Meachen regarding table of DES testing and slides for presentation [1.7]	\$500.00	1.7		\$850.00								
4/28/2021	Jim Thornton	Email to Brian Umpierre regarding billing service history [.2]	\$500.00	0.2		\$100.00								
4/28/2021	Jim Thornton	Work on confirming CLM expectation date with Dale Schroyer and advising team [.3]	\$500.00	0.3		\$150.00								
4/29/2021	David Marks	Review of Rubik's cube testing and work on summary/explanation of same [1.40]	\$950.00	1.4		\$1,330.00								
4/29/2021	David Marks	Teleconferences with S. Meachen to discuss slide presentation regarding Rubik's cube spreadsheet [.20]	\$950.00	0.2		\$190.00								
4/29/2021	David Marks	GoToMeeting with Attorney Thornton and S. Meachen regarding Rubik's cube presentation, and staffing and bundling defense, creation of slide explaining bundling, comparison of Dr. John Schnelle combined AM care to Flores/Watermark average times, reduction of our "AM care" combined times by the % difference (Schnelle vs. Flores Watermark times) [1.80]	\$950.00	1.8		\$1,710.00								
4/29/2021	David Marks	Review Sunrise PowerPoint documents for use in Rubik's cube testing [.90]	\$950.00	0.9		\$855.00								
4/29/2021	David Marks	Teleconference with B. Peters regarding part-time staffing at sample facilities [.3]	\$950.00	0.3		\$285.00								
4/29/2021	David Marks	Review of spreadsheet regarding part-time staffing [.3]	\$950.00	0.3		\$285.00								
4/29/2021	David Marks	Teleconference with Attorney Thornton regarding Dr. Schnelle AM care vs. Aegis, Sunrise [.30]	\$950.00	0.3		\$285.00								
4/29/2021	Jim Thornton	GoToMeetings w/Sterling Meachen, David Marks regarding slides related to presentation of Rubik's [1.8]	\$500.00	1.8		\$900.00								
4/29/2021	Jim Thornton	Work on additional runs and facility inputs [.7]	\$500.00	0.7		\$350.00								
4/29/2021	Jim Thornton	Work on Dr. Cristina Flores task time updates [.5]	\$500.00	0.5		\$250.00								
4/29/2021	Jim Thornton	Pulled multiple slides from Ann Lacey prep and sent to David Marks/Sterling Meachen [.5]	\$500.00	0.5		\$250.00								
4/29/2021	Jim Thornton	Received and reviewed emails regarding med manager's limited job duties [.3]	\$500.00	0.3		\$150.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
4/29/2021	Jim Thornton	Emails to and from David Marks regarding morning care task times and analysis regarding same .5	\$500.00	0.5	\$250.00								
4/29/2021	Jim Thornton	Work on confirming CLM inspection date .2	\$500.00	0.2	\$100.00								
4/29/2021	Jim Thornton	Call with David Marks regarding task times for Dr. Schnelle's defined AM/PM care vs. times from Aegis, Sunrise .3	\$500.00	0.3	\$150.00								
4/29/2021	Sterling Meachen	GoToMeetings w/Attorneys Thornton and Marks regarding slides related to presentation of Rubik's 1.8	\$225.00	1.8	\$405.00								
4/29/2021	Sterling Meachen	Updated presentation, incorporating slide changes made based on feedback from meeting with Attorneys Thornton and Marks 5.7	\$225.00	3.9	\$877.50								
4/30/2021	David Marks	Review of emails/documents produced in advance of 30b(6) depo .50	\$950.00	0.5	\$475.00								
4/30/2021	David Marks	Review B. Peters part-time hour staffing analysis .30	\$950.00	0.3	\$285.00								
4/30/2021	David Marks	Teleconference with B. Peters to discuss random vs. purposeful timing of part-time hours .30	\$950.00	0.3	\$285.00								
4/30/2021	David Marks	Teleconference with Attorney Thornton regarding update on staffing analysis and schedule .20	\$950.00	0.2	\$190.00								
4/30/2021	David Marks	Review and edit S. Meachen slides for Monday Rubik's presentation regarding simulation outputs .50	\$950.00	0.5	\$475.00								
4/30/2021	David Marks	Teleconference with S. Meachen and Attorney Thornton regarding Rubik's analysis .30	\$950.00	0.3	\$285.00								
4/30/2021	David Marks	Additional teleconference with S. Meachen regarding slide edits for Monday's Rubik's cube presentation 1.00	\$950.00	1	\$950.00								
4/30/2021	David Marks	Teleconference with Attorney Thornton regarding revisions to Rubik's Cube presentation 2.50	\$950.00	2.5	\$2,375.00								
4/30/2021	Sterling Meachen	Confer with Marks regarding service plan slides .3	\$225.00	0.3	\$67.50								
4/30/2021	Sterling Meachen	Created a flow plan and slides based off the resident service plan and what it contains 5.2	\$225.00	5.2	\$1,170.00								
4/30/2021	Jim Thornton	Calls w/Sterling Meachen and David Marks regarding slides for meeting .2	\$500.00	0.2	\$100.00								
4/30/2021	Jim Thornton	Prepared analysis of morning care tasks and sent to David Marks .8	\$500.00	0.8	\$400.00								
4/30/2021	Jim Thornton	Received and reviewed analysis from Blake Peters regarding part time/peak times .4	\$500.00	0.4	\$200.00								
4/30/2021	Jim Thornton	GoToMeeting w/Sterling Meachen regarding slides .4	\$500.00	0.4	\$200.00								
4/30/2021	Jim Thornton	Multiple emails regarding slides and edits .6	\$500.00	0.6	\$300.00								
4/30/2021	Jim Thornton	Call with David Marks regarding slide edits regarding next week's Rubik's cube presentation of DES testing results 2.5	\$500.00	2.5	\$1,250.00								
5/1/2021	Jim Thornton	Received and reviewed draft slides and explanatory emails with to dos from David Marks regarding upcoming meeting .8	\$500.00	0.8	\$400.00								
5/2/2021	David Marks	Create and edit additional slides for Monday presentation regarding Rubik's cube 1.40	\$950.00	1.4	\$1,330.00								
5/2/2021	David Marks	Teleconference with Attorney Thornton regarding slide ideas and to-dos for 5.3.2021 Rubik's Cube Meeting .40	\$950.00	0.4	\$380.00								
5/2/2021	David Marks	Draft spreadsheet/matrix for task bundling rules to be used in simulation to show effect of delivering various care tasks during a single visit to a resident and send to Attorney Thornton .20	\$950.00	1.3	\$1,235.00								
5/2/2021	Jim Thornton	Calls w/David Marks with to-dos before tomorrow's meeting 1.9	\$500.00	1.9	\$950.00								
5/2/2021	Jim Thornton	Call w/Dr. Cristina Flores regarding simple math analyses .2	\$500.00	0.2	\$100.00								

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						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
5/2/2021	Jim Thornton	Work on meeting slides for David Marks and responding to multiple emails from David Marks 2.3	\$500.00	2.3	\$1,150.00								
5/2/2021	Jim Thornton	Additional edits to slides sent to David Marks and Sterling Meachen .4	\$500.00	0.4	\$200.00								
5/2/2021	Jim Thornton	Emails to Dale Schroyer regarding travel .5	\$500.00	0.5	\$250.00								
5/2/2021	Jim Thornton	Work on analysis of best case scenarios from DES testing and updating Table 1.8	\$500.00	1.8	\$900.00								
5/3/2021	David Marks	Review and edit final slides for Rubik's cube conference .20	\$950.00	0.2	\$190.00								
5/3/2021	David Marks	Teleconference with Attorney Thornton and S. Meachen final slides .20	\$950.00	0.2	\$190.00								
5/3/2021	David Marks	Teleconference with Attorneys Healey, Thamer, Wallace Umpierre, Johnson and Thornton, and Dale Schroyer and Dr. Cristina Flores 1.70	\$950.00	1.7	\$1,615.00								
5/3/2021	David Marks	Teleconference with Attorney Thornton about quality assurance for Rubik's, San Rafael floor plan, wait times, and Kurt Shampine email regarding quality assurance .30	\$950.00	0.3	\$285.00								
5/3/2021	David Marks	3 teleconferences with Attorney Thornton regarding Rubik's and model .60	\$950.00	0.6	\$570.00								
5/3/2021	David Marks	Teleconference with B. Peters regarding "1 hour incremental staffing" per facility .20	\$950.00	0.2	\$190.00								
5/3/2021	David Marks	Teleconference with Attorney Thornton to discuss slides to be set to CA Team .20	\$950.00	0.2	\$190.00								
5/3/2021	David Marks	Quality assurance of Rubik's, including sending email to Kurt Shampine requesting 1 on 1 call .90	\$950.00	0.9	\$855.00								
5/3/2021	Sterling Meachen	Meet with Marks and Thornton regarding ADL care services .7	\$225.00	0.7	\$157.50								
5/3/2021	Sterling Meachen	Using excel created a spreadsheet that illustrates what specific ADL care services can be included/bundled with others and included spreadsheet on slide 3.0	\$225.00	3	\$675.00								
5/3/2021	Jim Thornton	GoToMeeting w/Brian Umpierre, Chris Healey, Blake Peters, Dr. Cristina Flores, GW, MT, David Marks, Mark Johnson, and Dale Schroyer regarding Rubik's cube and testing to date 1.7	\$500.00	1.7	\$850.00								
5/3/2021	Jim Thornton	Call w/Dale Schroyer regarding testing at San Mateo .4	\$500.00	0.4	\$200.00								
5/3/2021	Jim Thornton	Email of latest results to David Marks .2	\$500.00	0.2	\$100.00								
5/3/2021	Jim Thornton	Calls w/David Marks with updates of various projects including slides, QA, and Rubik's 1.3	\$500.00	1.3	\$650.00								
5/3/2021	Jim Thornton	Received and reviewed part time staffing analysis from Blake Peters .3	\$500.00	0.3	\$150.00								
5/3/2021	Jim Thornton	Work on updating thesaurus and Table of DES Testing to include additional details 1.9	\$500.00	1.9	\$950.00								
5/3/2021	Jim Thornton	Sent updates to David Marks and Sterling Meachen .2	\$500.00	0.2	\$100.00								
5/3/2021	Jim Thornton	Received and reviewed email from Brian Umpierre regarding 10 minute breaks .2	\$500.00	0.2	\$100.00								
5/3/2021	Jim Thornton	Work on slides for meeting 1.6	\$500.00	1.6	\$800.00								
5/3/2021	Jim Thornton	Emails regarding floorplans with team .3	\$500.00	0.3	\$150.00								
5/4/2021	David Marks	Teleconference with Attorney Thornton regarding sending slideshow for Rubik's presentation on Monday, and sending questions regarding Rubik's .80	\$950.00	0.8	\$760.00								
5/4/2021	David Marks	Teleconference with S. Meachen slides .10	\$950.00	0.1	\$95.00								
5/4/2021	David Marks	RR email from J. Thornton re: inventory proof required for DES testing .40	\$950.00	0.4	\$380.00								
5/4/2021	Sterling Meachen	Confer with Marks regarding slides .3	\$225.00	0.3	\$67.50								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
5/4/2021	Sterling Meachen	Prepared a set of rules and transposed on a slide the exact steps which are bundled including subpoints 5.6	\$225.00	5.6		\$1,260.00								
5/4/2021	Jim Thornton	Work on updated daily equivalent spreadsheet and sent to Blake Peters .3	\$500.00	0.3		\$150.00								
5/4/2021	Jim Thornton	Received and reviewed of hourly staffing analysis from Blake Peters .4	\$500.00	0.4		\$200.00								
5/4/2021	Jim Thornton	Received and reviewed internal analysis from MedModel with box plots of same .4	\$500.00	0.4		\$200.00								
5/4/2021	Jim Thornton	Prepare inventory of proof required related to DES testing and sent to David Marks 1.3	\$500.00	1.3		\$650.00								
5/4/2021	Jim Thornton	GoToMeeting w/Dale Schroyer regarding hourly staffing analysis and CLM review .7	\$500.00	0.7		\$350.00								
5/4/2021	Jim Thornton	Calls w/David Marks regarding staffing analyses .8	\$500.00	0.8		\$400.00								
5/4/2021	Jim Thornton	Numerous emails to and from team related to CLM inspection tomorrow .6	\$500.00	0.6		\$300.00								
5/4/2021	Jim Thornton	Prepared list of CLM inspection objectives and sent to Dale Schroyer with key Sunrise docs 1.9	\$500.00	1.9		\$950.00								
5/5/2021	David Marks	Teleconference with Attorney Thornton regarding Sunrise CLM inspection, and brief discussion of key takeaways 1.20	\$950.00	1.2		\$1,140.00								
5/5/2021	Sterling Meachen	Created an outline of 18 different key data sets condensed onto a 'Rubik's Cube' regarding test series and task times	\$225.00	5.2		\$1,170.00								
5/5/2021	Jim Thornton	Attended CLM review 2.1	\$500.00	2.1		\$1,050.00								
5/5/2021	Jim Thornton	Calls w/Blake Peters .2	\$500.00	0.2		\$100.00								
5/5/2021	Jim Thornton	Calls w/Dale Schroyer .5	\$500.00	0.5		\$250.00								
5/5/2021	Jim Thornton	Left message for Chris Healey regarding review .1	\$500.00	0.1		\$50.00								
5/5/2021	Jim Thornton	Calls w/ David Marks regarding CLM review 1.2	\$500.00	1.2		\$600.00								
5/5/2021	Jim Thornton	Received and reviewed Brian Umpierre's summary of the CLM review .3	\$500.00	0.3		\$150.00								
5/5/2021	Jim Thornton	Prepared brief additional comments and sent to team .4	\$500.00	0.4		\$200.00								
5/6/2021	Sterling Meachen	Using the individual floor plans of the facilities created new slides with each floor present for each nursing home with measurements of the building size	\$225.00	4.6		\$1,035.00								
5/6/2021	Jim Thornton	Calls w/Blake Peters .6	\$500.00	0.6		\$300.00								
5/6/2021	Jim Thornton	Prepared and sent updated daily equivalent spreadsheet to Blake Peters .5	\$500.00	0.5		\$250.00								
5/6/2021	Jim Thornton	Call w/Brian Umpierre regarding discovery issues and CLM review .6	\$500.00	0.6		\$300.00								
5/6/2021	Jim Thornton	Conference call w/California team regarding CLM and discovery 1.3	\$500.00	1.3		\$650.00			1.3	650				
5/6/2021	Jim Thornton	Work on care windows analysis .5	\$500.00	0.5		\$250.00								
5/7/2021	David Marks	Re-edit and clarify CLM inspection memo and review source documents .60	\$950.00	0.6		\$570.00								
5/7/2021	David Marks	GoToMeeting with Attorney Thornton regarding revision/clarification of CLM memo 1.70	\$950.00	1.7		\$1,615.00								
5/7/2021	David Marks	Review list of questions for Rubik's put together by Attorney Thornton (to revisit this next week) .20	\$950.00	0.2		\$190.00								
5/7/2021	David Marks	Teleconference with Attorney Thornton re: to dos for CLMs and Rubik's .20	\$950.00	0.2		\$190.00								
5/7/2021	Sterling Meachen	Given by data analyst created individual line graphs regarding AL, REM and AL with REM charts for each of the seven nursing homes	\$225.00	4.9		\$1,102.50								

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
							<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	5/7/2021	Jim Thornton	Brief calls with David Marks regarding various to-dos [.2]	\$500.00	0.2	\$100.00								
	5/7/2021	Jim Thornton	Work on Brian Umpierre memo and sent to Dale Schroyer for editing [.4]	\$500.00	0.4	\$200.00								
	5/7/2021	Jim Thornton	GoToMeeting w/David Marks regarding Brian Umpierre memo on CLM review [1.7]	\$500.00	1.7	\$850.00								
	5/7/2021	Jim Thornton	Work on 1.5 staffing level facility input spreadsheets for Dale Schroyer [.5]	\$500.00	0.5	\$250.00								
	5/7/2021	Jim Thornton	Work on proof-reading all Rubik's cube results [2.1]	\$500.00	2.1	\$1,050.00								
	5/7/2021	Jim Thornton	Continue work on analysis of DES testing [1.1]	\$500.00	1.1	\$550.00								
	5/7/2021	Jim Thornton	Work on census disconnect and impact of PPD analysis [.5]	\$500.00	0.5	\$250.00								
	5/7/2021	Jim Thornton	Sent census analysis to Blake Peters [.1]	\$500.00	0.1	\$50.00								
	5/7/2021	Jim Thornton	Multiple calls with Blake Peters regarding simple math analysis, census issues, and missing assessments latest analysis [.6]	\$500.00	0.6	\$300.00								
	5/7/2021	Jim Thornton	Email to Brian Umpierre regarding discovery and assessments [.3]	\$500.00	0.3	\$150.00								
	5/7/2021	Jim Thornton	Email to Chris Healey and California Team regarding 25th percentile being abandoned [.2]	\$500.00	0.2	\$100.00								
	5/9/2021	David Marks	Compose email to B. Peters regarding housekeepers (add to "care staff") for Sunrise and contrast staffing at Sunrise to Aegis with and without housekeepers [.20]	\$950.00	0.2	\$190.00								
	5/10/2021	David Marks	Receipt and review email from B. Peters regarding housekeepers (not broken down by AL vs. REM) [.10]	\$950.00	0.1	\$95.00								
	5/10/2021	Jim Thornton	GoToMeeting w/Dale Schroyer regarding discussing Rubik's cube and additional runs [1.2]	\$500.00	1.2	\$600.00								
	5/10/2021	Jim Thornton	Work on low, medium, high distributions based on ALF chains' ranges of task times and sent to Dale Schroyer [1.3]	\$500.00	1.3	\$650.00								
	5/10/2021	Jim Thornton	Provided additional Rubik's facility data to Dale Schroyer for use [.4]	\$500.00	0.4	\$200.00								
	5/11/2021	David Marks	Review of file emails from CA Team regarding Rubik's and CLM inspection memos/questions [.60]	\$950.00	0.6	\$570.00								
	5/11/2021	David Marks	Compose email responding to Attorney Healey questions regarding Rubik's information source/basis for base care [.30]	\$950.00	0.3	\$285.00								
	5/11/2021	David Marks	GoToMeeting with Attorney Thornton to identify key proof needed to support simulation and Rubik's base care [3.00]	\$950.00	3	\$2,850.00								
	5/11/2021	Jim Thornton	GoToMeeting w/David Marks regarding inventory of proof related to DES testing [3.0]	\$500.00	3	\$1,500.00								
	5/12/2021	Jim Thornton	Received and reviewed numerous emails regarding deadline calendar [.2]	\$500.00	0.2	\$100.00								
	5/12/2021	Jim Thornton	Received and reviewed email from Blake Peters regarding Sunrise staff clocking in for two different job titles [.3]	\$500.00	0.3	\$150.00								
	5/13/2021	David Marks	Teleconference with Attorney Thornton regarding To Do list regarding Rubik's and comparison to Aegis staffing/workload [.20]	\$950.00	0.2	\$190.00								
	5/13/2021	Jim Thornton	Call with David Marks regarding Rubik's and comparison to Aegis staffing/workload [.2]	\$500.00	0.2	\$100.00								
	5/14/2021	Jim Thornton	GoToMeeting w/Dr. Cristina Flores regarding Sunrise CLM process [.3]	\$500.00	0.3	\$150.00								
	5/16/2021	David Marks	Work on To Do list regarding Rubik's testing (printout) [.50]	\$950.00	0.5	\$475.00								
	5/18/2021	Jim Thornton	Received and reviewed email and Sunrise Strong slide from Blake Peters making keen observation [.4]	\$500.00	0.4	\$200.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
5/21/2021	Jim Thornton	Received and reviewed link to additional Sunrise production .2	\$500.00	0.2	\$100.00								
5/21/2021	Jim Thornton	Forwarded link to Blake Peters .1	\$500.00	0.1	\$50.00								
5/25/2021	David Marks	Scheduling of conference call regarding status update .10	\$950.00	0.1	\$95.00								
5/25/2021	Jim Thornton	Emails regarding scheduling conference with California team and agenda .3	\$500.00	0.3	\$150.00								
5/26/2021	Jim Thornton	Emails from and to Blake Peters regarding updated assessment data and service codes .6	\$500.00	0.6	\$300.00								
5/27/2021	Jim Thornton	Work on updated global expert inputs 2.4	\$500.00	2.4	\$1,200.00								
5/28/2021	Jim Thornton	Emails to Chris Healey and David Marks regarding schedule for call .2	\$500.00	0.2	\$100.00								
6/1/2021	Jim Thornton	Numerous emails regarding conference call schedule .3	\$500.00	0.3	\$150.00								
6/2/2021	David Marks	Status teleconference with Attorneys Healey, Stebner, Johnson, Wallace, Umpierre, and Thornton regarding complexity of underlying source data, Swartz on "crazy train," Dale Schroyer declaration due date, status of missing data, multiplier, and injunctive relief 1.10	\$950.00	1.1	\$1,045.00								
6/2/2021	Jim Thornton	Conference call with California team and David Marks 1.1	\$500.00	1.1	\$550.00			1.1	550				
6/2/2021	Jim Thornton	Calls with Blake Peters regarding census analysis and billing history issues .4	\$500.00	0.4	\$200.00								
6/2/2021	Jim Thornton	Review of census analysis focusing on days with matching census .5	\$500.00	0.5	\$250.00								
6/2/2021	Jim Thornton	Received and reviewed emails regarding various pleadings and responses from GW .2	\$500.00	0.2	\$100.00								
6/2/2021	Jim Thornton	Received and reviewed email from Chris Healey regarding case exposure analysis .4	\$500.00	0.4	\$200.00								
6/7/2021	Jim Thornton	Pulled presentation info related to Sunrise Table of DES testing and results and sent to David Marks .3	\$500.00	0.3	\$150.00								
6/8/2021	Jim Thornton	Began review of service code key application to latest data dump from Sunrise 1.8	\$500.00	1.8	\$900.00								
6/9/2021	David Marks	Reconciliation of expert costs and expenses advanced by MBGY, and payment of current expert invoices .10	\$950.00	0.1	\$95.00								
6/9/2021	David Marks	Meeting with Clayton Cain regarding invoices/payments to experts .30	\$950.00	0.3	\$285.00								
6/9/2021	David Marks	Compose email to attorney Healey regarding same .10	\$950.00	0.1	\$95.00								
6/9/2021	David Marks	Teleconference with Dale Schroyer regarding 4.30.21 ProModel invoice .20	\$950.00	0.2	\$190.00								
6/9/2021	David Marks	Respond to 4.30.21 email from Attorney Healey .30	\$950.00	0.3	\$285.00								
6/9/2021	David Marks	Research 4.30.21 invoice .30	\$950.00	0.3	\$285.00								
6/9/2021	David Marks	Review analyses for 6 sunrise facilities .90	\$950.00	0.9	\$855.00								
6/9/2021	David Marks	Compose email to Attorney Healey regarding the new census data analysis 1.10	\$950.00	1.1	\$1,045.00								
6/9/2021	David Marks	Teleconference with B. Peters regarding new census data produced by Sunrise and receipt and review B. Peters data .20	\$950.00	0.2	\$190.00								
6/9/2021	David Marks	GoToMeeting with Attorney Thornton regarding new census data .10	\$950.00	0.1	\$95.00								
6/9/2021	David Marks	Additional GoToMeeting with Attorney Thornton regarding edits to Rubik's cube and global expert inputs 3.3	\$950.00	3.3	\$3,135.00								
6/9/2021	Jim Thornton	Review of updated assessment data and work on service code key project 2.1	\$500.00	2.1	\$1,050.00								
6/9/2021	Jim Thornton	Sent updated service code key to Blake Peters .2	\$500.00	0.2	\$100.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked		General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
6/9/2021	Jim Thornton	Work on table of DES testing adding domain columns to show main area being tested 1.2	\$500.00	1.2	\$600.00								
6/9/2021	Jim Thornton	Sent Table of DES Testing to David Marks .1	\$500.00	0.1	\$50.00								
6/9/2021	Jim Thornton	Work on email to California team regarding census issues .4	\$500.00	0.4	\$200.00								
6/9/2021	Jim Thornton	GoToMeetings w/David Marks regarding census issues and Rubik's cube layout 3.4	\$500.00	3.4	\$1,700.00								
6/9/2021	Jim Thornton	Email to email to Dale Schroyer, CS, DT, BG regarding setting up meeting and agenda .4	\$500.00	0.4	\$200.00								
6/10/2021	David Marks	Teleconference with B. Peters regarding pairing billing history with assessment data by service level .30	\$950.00	0.3	\$285.00								
6/10/2021	David Marks	Compose email to Clayton Cain regarding payment of ProModel invoices .10	\$950.00	0.1	\$95.00								
6/10/2021	David Marks	Prepare for call with ProModel regarding simulation 2.0	\$950.00	2	\$1,900.00								
6/10/2021	David Marks	GoToMeeting with Attorney Thornton regarding review of global expert input column headings, input key for assessment services, rearrangement of columns in spreadsheets .70	\$950.00	0.7	\$665.00								
6/10/2021	David Marks	Review call memo .50	\$950.00	0.5	\$475.00								
6/10/2021	David Marks	GoToMeeting with J. Thornton and ProModel regarding To Do list prior to certification declaration and depo 1.80	\$950.00	1.8	\$1,710.00								
6/10/2021	David Marks	Teleconference with Attorney Thornton regarding extrapolation from assessment data to service billing history "service classification," Dale Schroyer formatting needs, and Dr. Edward Jones .30	\$950.00	0.3	\$285.00								
6/10/2021	David Marks	Compose email to Attorney Healey regarding meeting to discuss extrapolation from billing service history .10	\$950.00	0.1	\$95.00								
6/10/2021	Jim Thornton	GoToMeeting w/ David Marks regarding Sunrise--service code key headings .7	\$500.00	0.7	\$350.00								
6/10/2021	Jim Thornton	GoToMeeting with ProModel team and David Marks regarding global expert inputs and yesterday's defined agenda 1.8	\$500.00	1.8	\$900.00								
6/10/2021	Jim Thornton	Sent Table of DES Testing to team .2	\$500.00	0.2	\$100.00								
6/10/2021	Jim Thornton	Multiple calls with Blake Peters regarding census analysis and move-out date analysis .8	\$500.00	0.8	\$400.00								
6/10/2021	Jim Thornton	Received and reviewed email from Blake Peters regarding census and move out analyses .3	\$500.00	0.3	\$150.00								
6/10/2021	Jim Thornton	Received facility model data for Dale Schroyer .3	\$500.00	0.3	\$150.00								
6/10/2021	Jim Thornton	Call with David Marks regarding extrapolation from assessment data to service billing history "service classification," Dale Schroyer formatting needs for DES testing, and Dr. Edward Jones QA projects .3	\$500.00	0.3	\$150.00								
6/11/2021	David Marks	Teleconference with Attorneys Healey and Thornton regarding importance of extrapolation from simulation to billing service history and related issues .90	\$950.00	0.9	\$855.00								
6/11/2021	David Marks	Review of B. Peters census derived from billing hours vs. rept. census .30	\$950.00	0.3	\$285.00								
6/11/2021	David Marks	Teleconference with Attorney Thornton and B. Peters regarding extrapolation projects and updated Rubik's .40	\$950.00	0.4	\$380.00								
6/11/2021	David Marks	Teleconference with Attorney Thornton regarding simulation To Do regarding global expert inputs and analysis process .40	\$950.00	0.4	\$380.00								
6/11/2021	David Marks	Teleconference with Attorney Thornton regarding column headings and explanation for same (for purposes of depo prep) 1.40	\$950.00	1.4	\$1,330.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
6/11/2021	Jim Thornton	Multiple calls and texts with Blake Peters regarding census analysis and extrapolation project 1.3	\$500.00	1.3	\$650.00								
6/11/2021	Jim Thornton	Texts with Dale Schroyer regarding additional model runs with updated assessment data/census .2	\$500.00	0.2	\$100.00								
6/11/2021	Jim Thornton	Received and reviewed Sunrise Model Documentation spreadsheet 1.8	\$500.00	1.8	\$900.00								
6/11/2021	Jim Thornton	Conference call with David Marks and Chris Healey regarding extrapolations and Schroyer supplemental declaration .9	\$500.00	0.9	\$450.00								
6/11/2021	Jim Thornton	Call with Blake Peters and David Marks regarding extrapolation projects and updated Rubik's .4	\$500.00	0.4	\$200.00								
6/11/2021	Jim Thornton	Call with Dale Schroyer regarding plan for updating Rubik's and extrapolations .3	\$500.00	0.3	\$150.00								
6/11/2021	Jim Thornton	GoToMeeting w/David Marks regarding updating headings to global expert inputs and scenario inputs 1.4	\$500.00	1.4	\$700.00								
6/14/2021	David Marks	Teleconference with Attorney Thornton regarding status/calendar .10	\$950.00	0.1	\$95.00								
6/14/2021	David Marks	Additional teleconference with Attorney Thornton regarding Rubik's - sampling/clean data .30	\$950.00	0.3	\$285.00								
6/14/2021	Jim Thornton	Call to Blake Peters regarding Sunrise shift start times .1	\$500.00	0.1	\$50.00								
6/14/2021	Jim Thornton	GoToMeeting w/ Dale Schroyer regarding global expert inputs .9	\$500.00	0.9	\$450.00								
6/14/2021	Jim Thornton	Work on global expert inputs and new folder structure for further testing 2.8	\$500.00	2.8	\$1,400.00								
6/14/2021	Jim Thornton	Work on creating list of dates where census data matches for purposes of Blake Peters creating sets of simulation test data for each sample facility .8	\$500.00	0.8	\$400.00								
6/14/2021	Jim Thornton	Calls with David Marks regarding simulation test data and status of Rubik's .4	\$500.00	0.4	\$200.00								
6/14/2021	Jim Thornton	Call with Blake Peters regarding simulation test data .2	\$500.00	0.2	\$100.00								
6/15/2021	David Marks	Receipt and review email from Attorney Thornton regarding data pull for Rubik's .40	\$950.00	0.4	\$380.00								
6/15/2021	David Marks	GoToMeeting with Attorney Thornton regarding Rubik's testing, elevator use, scenario inputs, and census impact on testing. 1.20	\$950.00	1.2	\$1,140.00								
6/15/2021	Jim Thornton	GoToMeeting and call with Dale Schroyer regarding random pulls of daily data where census matches or is +/-1 .4	\$500.00	0.4	\$200.00								
6/15/2021	Jim Thornton	Work on daily pull project for DES test purposes .8	\$500.00	0.8	\$400.00								
6/15/2021	Jim Thornton	Continue work on Table of DES Testing .9	\$500.00	0.9	\$450.00								
6/15/2021	Jim Thornton	Prepared and sent email to David Marks regarding DES testing .2	\$500.00	0.2	\$100.00								
6/15/2021	Jim Thornton	GoToMeeting and calls with David Marks regarding Sunrise census issues and impact within DES testing .5	\$500.00	0.5	\$250.00								
6/15/2021	Jim Thornton	GoToMeeting w/ David Marks re Sunrise scenario inputs, elevator use and headings .7	\$500.00	0.7	\$350.00								
6/15/2021	Jim Thornton	Work on calendar of deadlines to ensure all projects completed in advance of hearings .3	\$500.00	0.3	\$150.00								
6/15/2021	Jim Thornton	GoToMeeting w/ Dale Schroyer regarding daily pulls and scenario inputs .5	\$500.00	0.5	\$250.00								
6/16/2021	Jim Thornton	Prepared set of instructions for Blake Peters regarding data pulls and modifications to facility inputs/headings .8	\$500.00	0.8	\$400.00								
6/16/2021	Jim Thornton	Sent email to Blake Peters with instructions .2	\$500.00	0.2	\$100.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked		General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
6/16/2021	Jim Thornton	Work on service code keys for DES testing .9	\$500.00	0.9	\$450.00								
6/16/2021	Jim Thornton	Work on scenario inputs .9	\$500.00	0.9	\$450.00								
6/17/2021	Jim Thornton	Sent Dr. Cristina Flores GEI inputs for review concerning bundling tests .4	\$500.00	0.4	\$200.00								
6/18/2021	Jim Thornton	Work on Table of DES testing and required spreadsheets with updated titles for simulation runs 3.0	\$500.00	3	\$1,500.00								
6/18/2021	Jim Thornton	Work on non-care staff activity schedule creation using random number process per Dale Schroyer 2.5	\$500.00	2.5	\$1,250.00								
6/18/2021	Jim Thornton	Work on updated scenario inputs .5	\$500.00	0.5	\$250.00								
6/18/2021	Jim Thornton	Created new folder structure for runs 2.0	\$500.00	2	\$1,000.00								
6/18/2021	Jim Thornton	GoToMeeting w/ Dale Schroyer regarding Table of Inputs and revised folder structure and random pulls of daily data to address census discrepancies .6	\$500.00	0.6	\$300.00								
6/18/2021	Jim Thornton	Work on data pulls for census issue .6	\$500.00	0.6	\$300.00								
6/18/2021	Jim Thornton	Calls and GoToMeeting w/Dr. Cristina Flores regarding bundling .3	\$500.00	0.3	\$150.00								
6/18/2021	Jim Thornton	Prepared summary of DES testing ready to perform and sent to David Marks .4	\$500.00	0.4	\$200.00								
6/21/2021	David Marks	Review Attorney Thornton's updated table of DES testing and prepare comments and questions for call with Attorney Thornton 1.10	\$950.00	1.1	\$1,045.00								
6/21/2021	David Marks	Teleconference with Attorney Thornton regarding same .60	\$950.00	0.6	\$570.00								
6/21/2021	David Marks	GoToMeeting with Attorney Thornton regarding Deadline Calendar - adding census, mathematical staffing analysis, declaration structure/exhibit, Rubik's cube, 365-day analysis, and exhibits for declaration 2.80	\$950.00	2.8	\$2,660.00								
6/21/2021	David Marks	Review and create calendar deadlines .20	\$950.00	0.2	\$190.00								
6/21/2021	David Marks	Teleconference with Attorney Thornton and B. Peters regarding deadline calendar .10	\$950.00	0.1	\$95.00								
6/21/2021	David Marks	Additional teleconference with Attorney Thornton regarding deadline calendar 2.00	\$950.00	2	\$1,900.00								
6/21/2021	Jim Thornton	Work on facility inputs for specific testing at .5, 1.5 and 2x PPD levels and with everything shifted to AL side 3.5	\$500.00	3.5	\$1,750.00								
6/21/2021	Jim Thornton	Numerous conversations with Dale Schroyer regarding runs .7	\$500.00	0.7	\$350.00								
6/21/2021	Jim Thornton	Continued work of Table of DES Testing .5	\$500.00	0.5	\$250.00								
6/21/2021	Jim Thornton	Call with David Marks regarding Table of DES Testing and structure/language .6	\$500.00	0.6	\$300.00								
6/21/2021	Jim Thornton	Calls and GoToMeeting w/David Marks regarding DES testing plan and calendar 2.8	\$500.00	2.8	\$1,400.00								
6/21/2021	Jim Thornton	Updated Dr. Cristina Flores approved service code key to include daily equivalent task times and sent to Blake Peters .4	\$500.00	0.4	\$200.00								
6/22/2021	David Marks	Work on amended Dale Schroyer amended declaration, including review of declarations in Sunrise and Aegis .70	\$950.00	0.7	\$665.00								
6/22/2021	David Marks	GoToMeeting with Attorney Thornton regarding same .70	\$950.00	0.7	\$665.00								
6/22/2021	David Marks	Compose email to Kurt Shampine regarding supporting QA declaration and status of invoice payment .10	\$950.00	0.1	\$95.00								
6/22/2021	David Marks	Review prior explanation of triangular distribution, non-service tasks, and Rubik's testing for Schroyer declaration .30	\$950.00	0.3	\$285.00								
6/22/2021	David Marks	Teleconference with B. Peters regarding status of math analysis .10	\$950.00	0.1	\$95.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
6/22/2021	Jim Thornton	Pulled prior declarations of Schroyer, Flores and Peters, and sent same to David Marks [.3]	\$500.00	0.3	\$150.00								
6/22/2021	Jim Thornton	GoToMeeting w/David Marks regarding Sunrise decs and calendar of critical deadlines [.7]	\$500.00	0.7	\$350.00								
6/22/2021	Jim Thornton	Email to Dr. Edward Jones regarding availability to discuss case [.2]	\$500.00	0.2	\$100.00								
6/22/2021	Jim Thornton	Calls with Blake Peters regarding census disconnect and random pulls [.2]	\$500.00	0.2	\$100.00								
6/22/2021	Jim Thornton	Recreated random pulls of testing data with least census issues [.5]	\$500.00	0.5	\$250.00								
6/22/2021	Jim Thornton	Sent pulls of testing data to Blake Peters [.2]	\$500.00	0.2	\$100.00								
6/22/2021	Jim Thornton	Review of random pulls and emailed Blake Peters regarding same [.4]	\$500.00	0.4	\$200.00								
6/22/2021	Jim Thornton	Prepared facility data sets with .5, 1.5, 2.0 PPD and all with AL/REM for DES testing [3.3]	\$500.00	3.3	\$1,650.00								
6/22/2021	Jim Thornton	Numerous calls with Blake Peters regarding service code key daily equivalent task times and various to dos [.6]	\$500.00	0.6	\$300.00								
6/22/2021	Jim Thornton	Received and reviewed updated census analysis report from Blake Peters [.2]	\$500.00	0.2	\$100.00								
6/22/2021	Jim Thornton	Received and reviewed simple math analysis from Blake Peters [.5]	\$500.00	0.5	\$250.00								
6/22/2021	Jim Thornton	Analysis of simple math data for days with matching census [.5]	\$500.00	0.5	\$250.00								
6/22/2021	Jim Thornton	Provided CF approved task time an global expert inputs to Dale Schroyer [.2]	\$500.00	0.2	\$100.00								
6/23/2021	David Marks	Teleconference with B. Peters regarding status of deterministic analysis [.10]	\$950.00	0.1	\$95.00								
6/23/2021	David Marks	Review B. Peters analysis of resident assessments [.40]	\$950.00	0.4	\$380.00								
6/23/2021	David Marks	Teleconference with Attorney Thornton regarding same [.20]	\$950.00	0.2	\$190.00								
6/23/2021	David Marks	Review Attorney Thornton edits to Schroyer amended declaration and offer initial comments/edits [1.00]	\$950.00	1	\$950.00								
6/23/2021	David Marks	Continue review of Schroyer declaration structure and edits. [.90]	\$950.00	0.9	\$855.00								
6/23/2021	David Marks	Review/prepare to discuss issues regarding extrapolation [.70]	\$950.00	0.7	\$665.00								
6/23/2021	Jim Thornton	Continue prep of facility data sets with .5, 1.5, 2.0 PPD and all with AL/REM for DES testing [.6]	\$500.00	0.6	\$300.00								
6/23/2021	Jim Thornton	Prepared initial draft of amended dec for Dale Schroyer and sent to David Marks [3.1]	\$500.00	3.1	\$1,550.00								
6/23/2021	Jim Thornton	Received and reviewed email from Dr. Jones and forwarded to David Marks [.2]	\$500.00	0.2	\$100.00								
6/23/2021	Jim Thornton	Calls with Blake Peters regarding various data handling questions regarding simple math analysis [.5]	\$500.00	0.5	\$250.00								
6/23/2021	Jim Thornton	Received and reviewed report on service levels and mean, min, max daily average times from Blake Peters [.8]	\$500.00	0.8	\$400.00								
6/23/2021	Jim Thornton	Began work on extrapolation project [1.2]	\$500.00	1.2	\$600.00								
6/23/2021	Jim Thornton	Call with David Marks regarding resident assessment analysis [.2]	\$500.00	0.2	\$100.00								
6/24/2021	David Marks	Prepare for call with Attorney Thornton regarding extrapolation [.20]	\$950.00	0.2	\$190.00								
6/24/2021	David Marks	GoToMeeting with Attorney Thornton and Dr. Richard Feldman regarding status of extrapolation/histograms regarding service levels and deterministic minutes [1.40]	\$950.00	1.4	\$1,330.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
6/24/2021	David Marks	GoToMeeting with Attorney Thornton regarding review of key points/questions for edits to draft Dale Schroyer declaration 1.0	\$950.00	1		\$950.00								
6/24/2021	David Marks	Compose email to Kurt Shampine regarding (a) need for declaration from Bruce/Dave, and (b) schedule a meeting to discuss result/industrial engineer implication .10	\$950.00	0.1		\$95.00								
6/24/2021	David Marks	Compose/send email to ProModel re: Sunrise cofer about "black belt" staffing model and date Tucker/Bruce Gladwin "six sigma" black belt qualifications. .20	\$950.00	0.2		\$190.00								
6/24/2021	Jim Thornton	Work on extrapolation project 1.2	\$500.00	1.2		\$600.00								
6/24/2021	Jim Thornton	GoToMeeting w/David Marks regarding extrapolation data and Dale Schroyer amended declaration 2.4	\$500.00	2.4		\$1,200.00								
6/24/2021	Jim Thornton	Sent latest draft of Dale Schroyer dec to David Marks and Diane Asher .2	\$500.00	0.2		\$100.00								
6/24/2021	Jim Thornton	Arrange meeting with Dr. Feldman to discuss extrapolation project .2	\$500.00	0.2		\$100.00								
6/24/2021	Jim Thornton	GoToMeeting with Dr. Feldman and Blake Peters regarding extrapolation methodology and data handling 1.4	\$500.00	1.4		\$700.00								
6/24/2021	Jim Thornton	Email to Dr. Feldman with specific requests for analysis and data necessary to perform same .5	\$500.00	0.5		\$250.00								
6/24/2021	Jim Thornton	Calls with Blake Peters regarding generating 365 day data pulls .3	\$500.00	0.3		\$150.00								
6/25/2021	David Marks	Teleconference with Attorney Thornton regarding report of call to Dr. Feldman regarding DES, B. Peters status regarding extrapolation, and Dale Schroyer status regarding DES -Rubik's .70	\$950.00	0.7		\$665.00								
6/25/2021	David Marks	Continue working on Schroyer Reply Declaration and compile checklist of simulation inputs and outputs to be addressed, review PowerPoint presentation analysis, review original class certification, and review of draft reply to class certification 4.60	\$950.00	4.6		\$4,370.00								
6/25/2021	David Marks	Teleconference with Attorney Healey regarding need for B. Peters declaration .10	\$950.00	0.1		\$95.00								
6/25/2021	David Marks	Additional teleconference with Attorney Healey regarding B. Peters Declaration .10	\$950.00	0.1		\$95.00								
6/25/2021	David Marks	Attorney C. Healey email re: Sunrise witnesses. .60	\$950.00	0.6		\$570.00								
6/25/2021	Diane Asher	Assist Attorney Marks re: drafting Reply to Class Certification	\$85.00	4.6		\$391.00								
6/25/2021	Jim Thornton	Emails to and from Dr. Feldman regarding additional data requested .3	\$500.00	0.3		\$150.00								
6/25/2021	Jim Thornton	Call w/Blake Peters regarding staffing non-care task times .1	\$500.00	0.1		\$50.00								
6/25/2021	Jim Thornton	Received and reviewed email from Blake Peters regarding simple math analysis .4	\$500.00	0.4		\$200.00								
6/25/2021	Jim Thornton	Review of motion for class cert, Flores Dec and Reply Brief ISO class cert motion 1.2	\$500.00	1.2		\$600.00								
6/25/2021	Jim Thornton	Highlighted version of motion for class cert and sent to David Marks .2	\$500.00	0.2		\$100.00								
6/25/2021	Jim Thornton	Call and email to Edward Jones regarding QA project .3	\$500.00	0.3		\$150.00								
6/25/2021	Jim Thornton	Call with David Marks regarding Dr. Feldman's report as to DES QA, status of extrapolation project and DES testing -Rubik's .7	\$500.00	0.7		\$350.00								
6/27/2021	David Marks	Teleconference with Attorney Thornton regarding Dale Schroyer declaration 0.20	\$950.00	0.2		\$190.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
6/27/2021	Jim Thornton	Work on all AL and all REM versions of facility test data for Dale Schroyer [.8]	\$500.00	0.8	\$400.00								
6/27/2021	Jim Thornton	Continued review of class cert pleadings for purposes of Dale Schroyer dec work [.3]	\$500.00	0.3	\$150.00								
6/27/2021	Jim Thornton	Call from David Marks regarding Dale Schroyer dec [.2]	\$500.00	0.2	\$100.00								
6/28/2021	David Marks	Review prior B. Peters declaration for purpose of Dale Schroyer and Dr. Cristina Flores amended/reply declarations [1.60]	\$950.00	1.6	\$1,520.00								
6/28/2021	David Marks	Prep for call with Attorney Thornton regarding amended/reply declarations of Schroyer and Flores [1.30]	\$950.00	1.3	\$1,235.00								
6/28/2021	David Marks	Teleconferences with Attorney Thornton regarding status of same [.90]	\$950.00	0.9	\$855.00								
6/28/2021	David Marks	Review of Flores declaration for key points analysis [1.00]	\$950.00	1	\$950.00								
6/28/2021	David Marks	Review status report regarding work by Dr. Jones, Schroyer DES testing status, Westinghouse rules (applied to all required time for every resident in each billing service history) [.30]	\$950.00	0.3	\$285.00								
6/28/2021	David Marks	Receipt and partial review of revised/amended declaration points/subjects for Schroyer declaration [.40]	\$950.00	0.4	\$380.00								
6/28/2021	David Marks	Receipt and review email from Attorney Thornton regarding Dr. Jones status, and meeting scheduled [.10]	\$950.00	0.1	\$95.00								
6/28/2021	David Marks	Receipt and review email from B. Peters regarding availability for meeting with Dr. Jones [.10]	\$950.00	0.1	\$95.00								
6/28/2021	David Marks	Receipt/review/compose emails from/to Kurt Shampine and Attorney Thornton regarding conference as to DES testing (conference set for Thursday) [.30]	\$950.00	0.3	\$285.00								
6/28/2021	Jim Thornton	Work on Dale Schroyer dec to include tables of counts of services and to address CLM review, Sunrise time standards, standard deviation [2.9]	\$500.00	2.9	\$1,450.00								
6/28/2021	Jim Thornton	Multiple calls with David Marks regarding additional items to include in Dr. Cristina Flores/Dale Schroyer decs [.9]	\$500.00	0.9	\$450.00								
6/28/2021	Jim Thornton	Call with Dr. Edward Jones regarding data QA project [.3]	\$500.00	0.3	\$150.00								
6/28/2021	Jim Thornton	Email to Blake Peters and David Marks regarding scheduling Jones meeting [.2]	\$500.00	0.2	\$100.00								
6/28/2021	Jim Thornton	Received and reviewed comments from Dr. Feldman regarding extrapolation project [.3]	\$500.00	0.3	\$150.00								
6/28/2021	Jim Thornton	Multiple calls w/Dale Schroyer regarding all AL and all REM facility inputs [.5]	\$500.00	0.5	\$250.00								
6/28/2021	Jim Thornton	Work on all AL and all REM facility inputs for Dale Schroyer [1.3]	\$500.00	1.3	\$650.00								
6/28/2021	Jim Thornton	Work on capturing average results for each Rubik's test and putting results into Table of DES Testing [1.8]	\$500.00	1.8	\$900.00								
6/28/2021	Jim Thornton	GoToMeetings with Blake Peters regarding QA work [.5]	\$500.00	0.5	\$250.00								
6/29/2021	David Marks	Receipt and review memo on updated of testing DES progress [.70]	\$950.00	0.7	\$665.00								
6/29/2021	David Marks	Teleconference with Attorney Thornton regarding same [.20]	\$950.00	0.2	\$190.00								
6/29/2021	David Marks	Prepare for teleconference with Attorney Thornton regarding [1] amended Flores declaration, and [2] agenda for ProModel conference call [.80]	\$950.00	0.8	\$760.00								
6/29/2021	David Marks	Receipt and review B. Peters deterministic analysis of Sunrise-CA based on service cost [.70]	\$950.00	0.7	\$665.00								
6/29/2021	David Marks	Prep for call with Attorney Thornton regarding same [1.00]	\$950.00	1	\$950.00								
6/29/2021	David Marks	GoToMeeting with Attorney Thornton regarding same [1.70]	\$950.00	1.7	\$1,615.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
6/29/2021	David Marks	Review To Do list/revised declarations and key points checklist .50	\$950.00	0.5	\$475.00								
6/29/2021	David Marks	Receipt and review calendar/date for Dr. Jones meeting .10	\$950.00	0.1	\$95.00								
6/29/2021	David Marks	Review email from Attorney Umpierre regarding discovery - discrepancies in assessment census data .10	\$950.00	0.1	\$95.00								
6/29/2021	David Marks	Compose email to Attorneys Healey and Wallace regarding whether declarations from Schroyer/Flores are supplemental or amended declarations .10	\$950.00	0.1	\$95.00								
6/29/2021	David Marks	Receipt and review Sunrise's opposition to certification (redlined version) 1.4	\$950.00	1.4	\$1,330.00								
6/29/2021	David Marks	Send eval request to J. Thornton re: staffing data from non-caregivers/management .2	\$950.00	0.2	\$190.00								
6/29/2021	Jim Thornton	Calls and texts with Blake Peters regarding Beverly Hills facility inputs .4	\$500.00	0.4	\$200.00								
6/29/2021	Jim Thornton	Informed Dale Schroyer regarding Beverly Hills update in process .2	\$500.00	0.2	\$100.00								
6/29/2021	Jim Thornton	Work on Dale Schroyer reply dec 5.2	\$500.00	5.2	\$2,600.00								
6/29/2021	Jim Thornton	GoToMeeting w/David Marks regarding dec 1.7	\$500.00	1.7	\$850.00								
6/29/2021	Jim Thornton	Review of shared resource analysis .6	\$500.00	0.6	\$300.00								
6/29/2021	Jim Thornton	Call with David Marks updating him on status of DES testing .2	\$500.00	0.2	\$100.00								
6/30/2021	David Marks	Review and edit draft Reply Declaration of Dale Schroyer, and review preliminary results of Rubik's cube 5.80	\$950.00	5.8	\$5,510.00								
6/30/2021	David Marks	Teleconference with Attorney Thornton regarding Sunrise opposition to Schroyer reply declaration .30	\$950.00	0.3	\$285.00								
6/30/2021	David Marks	Continue work on same .70	\$950.00	0.7	\$665.00								
6/30/2021	David Marks	Receipt and review Attorney Thornton edits to Schroyer declaration .40	\$950.00	0.4	\$380.00								
6/30/2021	Jim Thornton	Work on Dale Schroyer Reply dec 6.1	\$500.00	6.1	\$3,050.00	6.1	\$3,050.00						
6/30/2021	Jim Thornton	Calls with David Marks regarding Schroyer Reply dec .3	\$500.00	0.3	\$150.00								
6/30/2021	Jim Thornton	Calls with Blake Peters regarding inputs for model .1	\$500.00	0.1	\$50.00								
6/30/2021	Jim Thornton	Emails with Blake Peters regarding various analyses related to dec .9	\$500.00	0.9	\$450.00								
7/1/2021	David Marks	Prepare for teleconference with ProModel .90	\$950.00	0.9	\$855.00								
7/1/2021	David Marks	GoToMeeting with ProModel (Dale Schroyer, Bruce, Kurt Champagne) and Attorney Thornton regarding Rubik's cube project, scheduling of next meeting in a week, and related matters 1.10	\$950.00	1.1	\$1,045.00								
7/1/2021	David Marks	Teleconference with Attorney Thornton re: discussion about Sunrise defense .20	\$950.00	0.2	\$190.00								
7/1/2021	David Marks	Continue review of Attorney Thornton draft reply declaration of Schroyer and compose email to Attorney Thornton regarding my edits 1.6	\$950.00	1.6	\$1,520.00								
7/1/2021	David Marks	Continue review and revisions to Schroyer declaration 2.10	\$950.00	2.1	\$1,995.00								
7/1/2021	David Marks	Teleconference with Attorney Thornton regarding Schroyer project status and need to request from Attorney Healey depo testimony regarding caregiver definition and management assistance providing ADLs .50	\$950.00	0.5	\$475.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked		General		Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
7/1/2021	David Marks	Compose email to Attorney Healey and CA Team regarding status of Flores simple math analysis, update on ProModel 365 day simulation for 6 sample facilities, and request for depo testimony re: specific staff responsible for ADLs and any management involvement in same. .10	\$950.00	0.1		\$95.00									
7/1/2021	Jim Thornton	Calls w/David Marks regarding various Dale Schroyer reply dec edits .5	\$500.00	0.5		\$250.00									
7/1/2021	Jim Thornton	Work on Dale Schroyer reply dec 1.5	\$500.00	1.5		\$750.00									
7/1/2021	Jim Thornton	GoToMeeting with David Marks regarding Dale Schroyer Dec and caregiver definition 1.1	\$500.00	1.1		\$550.00									
7/1/2021	Jim Thornton	Work on email to Chris Healey regarding status and requesting deposition cites .4	\$500.00	0.4		\$200.00									
7/1/2021	Jim Thornton	Work on Table of DES Testing and data 1.3	\$500.00	1.3		\$650.00									
7/1/2021	Jim Thornton	Prepared agenda for ProModel call and sent to David Marks .5	\$500.00	0.5		\$250.00									
7/1/2021	Jim Thornton	Emails setting up meeting with ProModel personnel .3	\$500.00	0.3		\$150.00									
7/1/2021	Jim Thornton	GoToMeetings with ProModel team re QA process .9	\$500.00	0.9		\$450.00									
7/1/2021	Jim Thornton	Call with David Marks regarding Sunrise defenses .2	\$500.00	0.2		\$100.00									
7/1/2021	Jim Thornton	Call with David Marks regarding DES testing status and caregiver definition and managerial staff claiming to provide ADLs .5	\$500.00	0.5		\$250.00									
7/2/2021	David Marks	Continued revisions to Dale Schroyer declaration 1.20	\$950.00	1.2		\$1,140.00									
7/2/2021	David Marks	Work on Google docs share with Attorney Thornton regarding revisions to Dale Schroyer declaration. 2.50	\$950.00	2.5		\$2,375.00									
7/2/2021	David Marks	Teleconference with Attorney Thornton regarding basis for selection of Rubik's cube base care - max efficiency .10	\$950.00	0.1		\$95.00									
7/2/2021	Sterling Meachen	Using discrete event simulation data point created custom charts outlining the results over 365 days for Alta Loma Beverly Hills and La Jolla	\$225.00	5.3		\$1,192.50									
7/2/2021	Jim Thornton	Work with David Marks on shared Google doc 2.5	\$500.00	2.5		\$1,250.00									
7/2/2021	Jim Thornton	Work on updating Table of DES Testing 1.8	\$500.00	1.8		\$900.00									
7/2/2021	Jim Thornton	Emails from GW and Chris Healey regarding various updates on dec project .4	\$500.00	0.4		\$200.00									
7/2/2021	Jim Thornton	Call with David Marks regarding selection of Rubik's cube base "best case" test Series with max efficiency .1	\$500.00	0.1		\$50.00									
7/3/2021	Jim Thornton	Pulled key Sunrise documents for reference in declarations .5	\$500.00	0.5		\$250.00									
7/3/2021	Jim Thornton	Sent MedModel team and David Marks link to key Sunrise documents .3	\$500.00	0.3		\$150.00									
7/5/2021	David Marks	Review and revise original Dale Schroyer declaration for inclusion of DES testing and failure analysis 4.60	\$950.00	4.6		\$4,370.00									
7/5/2021	David Marks	GoToMeeting with Attorney Thornton regarding revisions/discussion of Schroyer declaration results and likely defensive points to address 3.80	\$950.00	3.8		\$3,610.00									
7/5/2021	David Marks	Continue revision of Schroyer declaration - service code key/resident assessment and census section 1.90	\$950.00	1.9		\$1,805.00									
7/5/2021	Jim Thornton	GoToMeeting w/David Marks regarding Dale Schroyer Reply dec 3.8	\$500.00	3.8		\$1,900.00									
7/6/2021	David Marks	Continue drafting of Dale Schroyer declaration and review of following Sunrise input data: (a) raw facility specific data, (b) voluminous raw data, (c) general inputs/logic, (d) policies of Sunrise plus review of email from Attorney Healey regarding key declaration points 7.30	\$950.00	7.3		\$6,935.00	7.3	\$6,935.00							

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
							<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/6/2021	David Marks	GoToMeeting with Attorney Thornton regarding Schroyer as to Sunrise input data 4.50	\$950.00	4.5	\$4,275.00								
	7/6/2021	David Marks	Teleconference with B. Peters regarding Sunrise summaries and raw specific data .30	\$950.00	0.3	\$285.00								
	7/6/2021	David Marks	Compose email to Attorneys Healey and Umpierre regarding the definition of acronyms (ALC, BOC, RCD) used by Sunrise in PowerPoint .10	\$950.00	0.1	\$95.00								
	7/6/2021	Diane Asher	Assist Attorney Marks re: drafting Dale Schroyer declaration	\$85.00	5.5	\$467.50								
	7/6/2021	Sterling Meachen	Using discrete event simulation data point created custom charts outlining the results over 365 days for Monterey, San Mateo and San Raphael	\$225.00	5.9	\$1,327.50								
	7/6/2021	Jim Thornton	Received and reviewed Dave Tucker CV .3	\$500.00	0.3	\$150.00								
	7/6/2021	Jim Thornton	Received and reviewed email from Chris Healey regarding main points for Dale Schroyer dec to cover .4	\$500.00	0.4	\$200.00								
	7/6/2021	Jim Thornton	Emails with Brian Umpierre identifying job title acronyms .4	\$500.00	0.4	\$200.00								
	7/6/2021	Jim Thornton	GoToMeeting w/David Marks regarding Dale Schroyer Reply dec 4.5	\$500.00	4.5	\$2,250.00								
	7/6/2021	Jim Thornton	Received and reviewed draft of reply brief regarding class certification from Chris Healey .3	\$500.00	0.3	\$150.00								
	7/6/2021	Jim Thornton	Work with Blake Peters regarding SAS programming files .3	\$500.00	0.3	\$150.00								
	7/7/2021	David Marks	Compose multiple emails to Attorney Thornton regarding "Hawthorne" effect and "tipping point" to discuss with Dave Tucker and Dale Schroyer .20	\$950.00	0.2	\$190.00								
	7/7/2021	David Marks	Regarding expert Tucker/ Bruce Gladwin MedModel declarations, review/edit of key subject areas and review of Tucker and Gladwin C.V.s .60	\$950.00	0.6	\$570.00								
	7/7/2021	David Marks	GoToMeeting with Attorney Thornton regarding Schroyer draft declaration and discussion with MedModel (Dave/Bruce) 2.60	\$950.00	2.6	\$2,470.00								
	7/7/2021	David Marks	Receive update from J. Thornton re: current status of DES testing. .20	\$950.00	0.2	\$190.00								
	7/7/2021	Sterling Meachen	Created a comprehensive spreadsheet outlining the detail of each of the floor plans and what they contain (floors, rooms, memory care, nonresidential rooms, etc.)	\$225.00	3.6	\$810.00								
	7/7/2021	Jim Thornton	GoToMeeting w/David Marks regarding Dale Schroyer Reply dec 2.6	\$500.00	2.6	\$1,300.00								
	7/7/2021	Jim Thornton	Pull together key documents for ProModel review .5	\$500.00	0.5	\$250.00								
	7/7/2021	Jim Thornton	Sent email and DropBox link of key documents to Bruce Gladwin, Dave Tucker, Kurt Shampine, Dale Schroyer, David Marks .3	\$500.00	0.3	\$150.00								
	7/7/2021	Jim Thornton	Work on inputting results into Table of DES Testing 1.8	\$500.00	1.8	\$900.00								
	7/7/2021	Jim Thornton	Updated David Marks as to status of testing .2	\$500.00	0.2	\$100.00								
	7/8/2021	David Marks	Review Dale Schroyer final Rubik's test results, and begin integration of results and draft declaration section containing these results .80	\$950.00	0.8	\$760.00								
	7/8/2021	David Marks	Multiple teleconferences with Attorney Thornton regarding update on status of 365-day run and related issues, and discuss plan of action for drafting of results section organized by key subject areas .50	\$950.00	0.5	\$475.00								
	7/8/2021	David Marks	Review Rubik's cube spreadsheet/column heading definitions 1.00	\$950.00	1	\$950.00								
	7/8/2021	David Marks	Review all Rubik's cube results per facility 1.30	\$950.00	1.3	\$1,235.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked		General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
7/8/2021	David Marks	Review of Schroyer declaration regarding key points, and prep for call with Attorney Thornton .50	\$950.00	0.5	\$475.00								
7/8/2021	David Marks	GoToMeeting with Attorney Thornton regarding discussion on key points in results section of Dale Schroyer declaration 2.00	\$950.00	2	\$1,900.00								
7/8/2021	David Marks	Receipt and review email from Attorney Thornton regarding Rubik's results send to CA team. .20	\$950.00	0.2	\$190.00								
7/8/2021	David Marks	Receipt and review email from Attorney Healey regarding points to address in Schroyer declaration (if possible) .30	\$950.00	0.3	\$285.00								
7/8/2021	David Marks	Compose email to Attorney Healey regarding the key points Schroyer can and cannot address in his declaration .30	\$950.00	0.3	\$285.00								
7/8/2021	David Marks	Print and review in depth Sunrise opposition and draft declaration of Dave Tucker 1.10	\$950.00	1.1	\$1,045.00								
7/8/2021	David Marks	Prep for teleconference with ProModel regarding Tucker declaration .60	\$950.00	0.6	\$570.00								
7/8/2021	David Marks	Work on and determine Sunrise key arguments to address in Schroyer declaration 3.80	\$950.00	3.8	\$3,610.00								
7/8/2021	David Marks	GoToMeeting with Attorney Thornton, Bruce Gladwin, Kurt Shampine and Schroyer regarding Tucker declaration 1.30	\$950.00	1.3	\$1,235.00								
7/8/2021	David Marks	Teleconference with Attorney Thornton regarding adding Tucker qualification as ProModel team member to Schroyer Reply declaration as part of team .20	\$950.00	0.2	\$190.00								
7/8/2021	Sterling Meachen	Compiled the floorplan documents using adobe bridge and acrobat for use in presentation and simulation	\$225.00	5.2	\$1,170.00								
7/8/2021	Jim Thornton	Pulled results and populated DES Table of Testing .8	\$500.00	0.8	\$400.00								
7/8/2021	Jim Thornton	GoToMeeting w/ Dale Schroyer reviewing results and discussing final runs .5	\$500.00	0.5	\$250.00								
7/8/2021	Jim Thornton	GoToMeetings with David Marks regarding Dale Schroyer Reply dec and Table of DES Testing 2.0	\$500.00	2	\$1,000.00								
7/8/2021	Jim Thornton	Work on results section of Dale Schroyer Reply Dec 2.9	\$500.00	2.9	\$1,450.00								
7/8/2021	Jim Thornton	GoToMeeting w/ProModel Team and David Marks regarding decs of Bruce Gladwin and Dave Tucker 1.3	\$500.00	1.3	\$650.00								
7/8/2021	Jim Thornton	Numerous emails related to Gladwin and Tucker decs .5	\$500.00	0.5	\$250.00								
7/8/2021	Jim Thornton	10 calls from David Marks regarding various aspects of Dale Schroyer dec .7	\$500.00	0.7	\$350.00								
7/8/2021	Jim Thornton	Emails with Edward Jones regarding QA .4	\$500.00	0.4	\$200.00								
7/8/2021	Jim Thornton	Emails with SM regarding floorplans with measurements .3	\$500.00	0.3	\$150.00								
7/9/2021	David Marks	Teleconference with Attorney Thornton regarding Sunrise billing history (custom levels) To Dos .30	\$950.00	0.3	\$285.00								
7/9/2021	David Marks	Continue revisions to Dale Schroyer declaration (sent to Attorney Thornton at 12:52 pm) and continue to edit and draft language for declaration 4.60	\$950.00	4.6	\$4,370.00								
7/9/2021	David Marks	Teleconference with Attorney Thornton regarding summary of "required hours vs. available hours" needed for Schroyer draft declaration .20	\$950.00	0.2	\$190.00								
7/9/2021	David Marks	GoToMeeting with Attorney Thornton to discuss Sunrise results section of Schroyer reply declaration 1.70	\$950.00	1.7	\$1,615.00								
7/9/2021	David Marks	Continue final review Rubik's column and row working, standard inputs, and related matters 1.10	\$950.00	1.1	\$1,045.00								
7/9/2021	David Marks	Additional GoToMeeting with Attorney Thornton to discuss and continued editing Schroyer reply declaration - result section 1.00	\$950.00	1	\$950.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
7/9/2021	Diane Asher	Continue assisting Attorney Marks re: revisions to Dale Schroyer declaration	\$85.00	4.5		\$382.50								
7/9/2021	Jim Thornton	Email to David Marks and Blake Peters regarding counts of residents in uncapped service levels .5	\$500.00	0.5		\$250.00								
7/9/2021	Jim Thornton	GoToMeeting tests with Blake Peters .4	\$500.00	0.4		\$200.00								
7/9/2021	Jim Thornton	GoToMeetings with Bruce Gladwin and Blake Peters regarding review of raw data and conversion process 2.0	\$500.00	2		\$1,000.00								
7/9/2021	Jim Thornton	GoToMeetings with David Marks regarding Dale Schroyer dec 2.7	\$500.00	2.7		\$1,350.00								
7/9/2021	Jim Thornton	Work on descriptions within Table of DES testing and confirming results 3.4	\$500.00	3.4		\$1,700.00								
7/9/2021	Jim Thornton	Emails to Bruce Gladwin regarding calibration .3	\$500.00	0.3		\$150.00								
7/9/2021	Jim Thornton	Received and reviewed comments from Bruce Gladwin .3	\$500.00	0.3		\$150.00								
7/9/2021	Jim Thornton	Received and reviewed Dave Tucker dec .5	\$500.00	0.5		\$250.00								
7/10/2021	David Marks	Teleconference with Attorney Thornton regarding staffing gap chart analysis .20	\$950.00	0.2		\$190.00								
7/10/2021	David Marks	Continue review and edits to Dale Schroyer reply declaration - results section 3.40	\$950.00	3.4		\$3,230.00								
7/10/2021	David Marks	GoToMeeting with Attorney Thornton to discuss gap chart for Alta Loma and input of laundry (service code 9.1) .70	\$950.00	0.7		\$665.00								
7/10/2021	Jim Thornton	GoToMeeting w/David Marks regarding decs .7	\$500.00	0.7		\$350.00								
7/10/2021	Jim Thornton	Work on Declaration of Dale Schroyer and sent to David Marks 3.4	\$500.00	3.4		\$1,700.00								
7/10/2021	Jim Thornton	Emails with Blake Peters regarding PPD analysis for Sunrise job titles .4	\$500.00	0.4		\$200.00								
7/10/2021	Jim Thornton	Continued work on Schroyer Dec 1.4	\$500.00	1.4		\$700.00								
7/10/2021	Jim Thornton	Call with David Marks regarding gap charts and best case DES results .2	\$500.00	0.2		\$100.00								
7/11/2021	David Marks	Draft and edit result section of Dale Schroyer declaration .70	\$950.00	0.7		\$665.00								
7/11/2021	David Marks	GoToMeeting with Attorney Thornton regarding same 3.20	\$950.00	3.2		\$3,040.00								
7/11/2021	Jim Thornton	GoToMeeting w/David Marks regarding Dale Schroyer reply dec 3.2	\$500.00	3.2		\$1,600.00								
7/11/2021	Jim Thornton	Emails with Blake Peters regarding job titles .3	\$500.00	0.3		\$150.00								
7/11/2021	Jim Thornton	W/on triangular distribution task time formulas to confirm same 1.4	\$500.00	1.4		\$700.00								
7/12/2021	David Marks	Teleconference with Attorney Thornton regarding plan of action for this afternoon's edit session of Schroyer declaration .30	\$950.00	0.3		\$285.00								
7/12/2021	David Marks	Teleconference with Attorney Thornton regarding status of final DES tests .10	\$950.00	0.1		\$95.00								
7/12/2021	David Marks	Teleconference with Dr. Rich Feldman regarding triangular distribution .30	\$950.00	0.3		\$285.00								
7/12/2021	David Marks	Receipt and review of multiple emails from Dr. Feldman regarding triangular distribution .20	\$950.00	0.2		\$190.00								
7/12/2021	David Marks	Teleconference with Schroyer regarding random number generator in DES .30	\$950.00	0.3		\$285.00								
7/12/2021	David Marks	Continue with revision of results section of Schroyer declaration .80	\$950.00	0.8		\$760.00								
7/12/2021	David Marks	GoToMeeting with Attorney Thornton regarding same 2.80	\$950.00	2.8		\$2,660.00								
7/12/2021	David Marks	Compose email to Attorney Thornton regarding lowest average time .10	\$950.00	0.1		\$95.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
7/12/2021	David Marks	Draft language for Schroyer general inputs section of reply declaration .70	\$950.00	0.7	\$665.00								
7/12/2021	David Marks	GoToMeeting with Attorney Thornton regarding general input draft edits to Schroyer reply declaration 5.70	\$950.00	5.7	\$5,415.00								
7/12/2021	David Marks	Teleconference with Attorney Healey regarding Sunrise defective staffing method (and whether to include in Schroyer declaration) and status .20	\$950.00	0.2	\$190.00								
7/12/2021	David Marks	Receipt and review multiple emails from Attorney Healey regarding Schroyer declaration .20	\$950.00	0.2	\$190.00								
7/12/2021	David Marks	Receipt and review email from Attorney Umpierre regarding supporting declaration .10	\$950.00	0.1	\$95.00								
7/12/2021	Jim Thornton	Lengthy GoToMeetings w/David Marks regarding Dale Schroyer reply dec 8.5	\$500.00	8.5	\$4,250.00	8.5	\$4,250.00						
7/12/2021	Jim Thornton	Work on gap charts .7	\$500.00	0.7	\$350.00								
7/12/2021	Jim Thornton	Messages to Dale Schroyer regarding laundry results .2	\$500.00	0.2	\$100.00								
7/12/2021	Jim Thornton	Calls with Rich Feldman regarding triangular distributions and added footnote to Dale Schroyer dec .4	\$500.00	0.4	\$200.00								
7/12/2021	Jim Thornton	Call with David Marks regarding plan regarding Schroyer declaration .3	\$500.00	0.3	\$150.00								
7/12/2021	Jim Thornton	Call with David Marks regarding final DES test runs .1	\$500.00	0.1	\$50.00								
7/13/2021	David Marks	Teleconference with Attorney Thornton regarding status of DES testing and declaration draft .20	\$950.00	0.2	\$190.00								
7/13/2021	David Marks	Receipt and review email from Attorney Thornton regarding lowest average omitted care time .10	\$950.00	0.1	\$95.00								
7/13/2021	David Marks	Prep for GoToMeeting regarding Dale Schroyer Reply Declaration draft and draft To Do's for today .70	\$950.00	0.7	\$665.00								
7/13/2021	David Marks	GoToMeeting with Attorney Thornton regarding edit Schroyer Reply Declaration completing initial draft 7.40	\$950.00	7.4	\$7,030.00	7.4	\$7,030.00						
7/13/2021	David Marks	Zoom Meeting with Diane Asher regarding checking for remaining holes/questions to Schroyer Reply Declaration, and reformatting declaration 2.0	\$950.00	2	\$1,900.00								
7/13/2021	David Marks	Teleconference with Attorney Thornton regarding status of graphics, results for DES, and definition and proof of caregiver .20	\$950.00	0.2	\$190.00								
7/13/2021	David Marks	Compose email to Attorney Umpierre regarding "caregiver" proof .50	\$950.00	0.5	\$475.00								
7/13/2021	David Marks	Teleconference with Attorney Healey regarding non-caregiver data .20	\$950.00	0.2	\$190.00								
7/13/2021	David Marks	Compose email to CA Team transmitting initial draft of Schroyer declaration with explanation of key points .30	\$950.00	0.3	\$285.00								
7/13/2021	Diane Asher	Confer with Attorney Marks re: Schroyer declaration and editing to declaration	\$85.00	2	\$170.00								
7/13/2021	Sterling Meachen	Edits done and notes based on outputted floorplans were taken into Illustrator for final product	\$225.00	4.3	\$967.50								
7/13/2021	Jim Thornton	Emails to and from David Marks regarding Flores times .4	\$500.00	0.4	\$200.00								
7/13/2021	Jim Thornton	Communications with Dale Schroyer regarding laundry runs .2	\$500.00	0.2	\$100.00								
7/13/2021	Jim Thornton	Review of Flores task times .1	\$500.00	0.1	\$50.00								
7/13/2021	Jim Thornton	Email to David Marks regarding same .1	\$500.00	0.1	\$50.00								
7/13/2021	Jim Thornton	Call from David Marks regarding status of graphics, results for DES, and definition and proof of caregiver .2	\$500.00	0.2	\$100.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>	<u>Travel</u>
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
7/13/2021	Jim Thornton	GoToMeetings w/David Marks regarding Dale Schroyer dec 7.4	\$500.00	7.4	\$3,700.00	7.4	\$3,700.00				
7/13/2021	Jim Thornton	Work on completing all tables within dec 1.6	\$500.00	1.6	\$800.00						
7/14/2021	David Marks	Edit/draft non-caregiver section/response, approach for other Sunrise-CA facilities, general inputs and footnotes and review of Attorney Healey's comments to drafts sent last night 3.40	\$950.00	3.4	\$3,230.00						
7/14/2021	David Marks	Teleconference with Attorney Healey regarding Dale Schroyer Reply Declaration language and status .20	\$950.00	0.2	\$190.00						
7/14/2021	David Marks	Receipt and review of email/PowerPoints from Attorney Umpierre regarding non-care staff percent of time spent delivering care .70	\$950.00	0.7	\$665.00						
7/14/2021	David Marks	Receipt and review of S. Meachen's revised gap charts .10	\$950.00	0.1	\$95.00						
7/14/2021	David Marks	Receipt and review email from Attorney Umpierre containing Sunrise description of Terrace Club .20	\$950.00	0.2	\$190.00						
7/14/2021	David Marks	Receipt and review email from Attorney Thornton's containing revision of travel distance and travel time .20	\$950.00	0.2	\$190.00						
7/14/2021	David Marks	Edit same .50	\$950.00	0.5	\$475.00						
7/14/2021	David Marks	GoToMeeting with Attorney Thornton to edit and draft Dale Schroyer Reply Declaration inserting new results and complete place holder portions of Reply Declaration 3.30	\$950.00	3.3	\$3,135.00						
7/14/2021	David Marks	Review/edit new sections to Reply Brief and Schroyer Reply Declaration .70	\$950.00	0.7	\$665.00						
7/14/2021	David Marks	GoToMeeting with Attorney Thornton to continue edit and drafting of Schroyer Declaration 1.10	\$950.00	1.1	\$1,045.00						
7/14/2021	David Marks	Multiple teleconferences with B. Peters regarding average hours worked by non-caregivers for Reply Brief .30	\$950.00	0.3	\$285.00						
7/14/2021	David Marks	GoToMeeting with Attorney Thornton regarding Schroyer Reply Declaration and staff travel time/travel distance 4.60	\$950.00	4.6	\$4,370.00						
7/14/2021	David Marks	Compose emails to Attorneys Healey and Umpierre regarding questions about exhibits and specific language and salaried Sunrise positions in Reply Brief .20	\$950.00	0.2	\$190.00						
7/14/2021	David Marks	Compose email to CA Team (1) explaining revised draft and new additions to Reply Brief regarding staff travel time and travel distance and (2) including new language regarding same in Reply Brief draft .70	\$950.00	0.7	\$665.00						
7/14/2021	David Marks	GoToMeeting w/ Dale Schroyer and Attorney Thornton regarding Schroyer declaration .60	\$950.00	0.6	\$570.00						
7/14/2021	Diane Asher	Assist Attorney Marks re: non-caregiver section/response	\$85.00	2.2	\$187.00						
7/14/2021	Diane Asher	Assist Attorney Marks re: edits to draft Dale Schroyer reply declaration	\$85.00	1.6	\$136.00						
7/14/2021	Sterling Meachen	Revisited DES graphs with data and imposed the total hours of basic care omitted into the charts with coloration to illustrate the gap between both line graphs	\$225.00	5.5	\$1,237.50						
7/14/2021	Jim Thornton	Multiple (all) day GoToMeetings w/ David Marks working on edits to Dale Schroyer dec 9.0	\$500.00	9	\$4,500.00	9	\$4,500.00				
7/14/2021	Jim Thornton	Numerous emails to and from team regarding various sections of the dec and related tables .9	\$500.00	0.9	\$450.00						
7/14/2021	Jim Thornton	GoToMeeting w/ David Marks and Dale Schroyer regarding Schroyer dec .6	\$500.00	0.6	\$300.00						
7/14/2021	Jim Thornton	Prepared explanatory status email to send to California team with draft dec .4	\$500.00	0.4	\$200.00						

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
							<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/14/2021	Jim Thornton	Sent draft dec to Dale Schroyer for review .2	\$500.00	0.2	\$100.00								
	7/15/2021	David Marks	Receipt and review email from Attorney Umpierre regarding job description Bates for Reply Brief/Schroyer .10	\$950.00	0.1	\$95.00								
	7/15/2021	David Marks	Meeting with B. Peters regarding analysis of non-caregiver average per day hours .40	\$950.00	0.4	\$380.00								
	7/15/2021	David Marks	Receipt and review of B. Peters' analysis of non-caregiver average per day hours .20	\$950.00	0.2	\$190.00								
	7/15/2021	David Marks	Receipt and review of Attorney Healey's suggested edits to Schroyer Reply Declaration .10	\$950.00	0.1	\$95.00								
	7/15/2021	David Marks	Teleconference with Attorney Thornton to discuss Attorney Healey suggested edits to Schroyer Reply Declaration .20	\$950.00	0.2	\$190.00								
	7/15/2021	David Marks	Integrate edits into Schroyer reply declaration 1.00	\$950.00	1	\$950.00								
	7/15/2021	David Marks	Prepare for GoToMeeting with Attorney Thornton regarding remaining declaration points to address/edit .40	\$950.00	0.4	\$380.00								
	7/15/2021	David Marks	GoToMeeting with Attorney Thornton regarding edits in response to Attorney Healey suggestions, Attorney Umpierre evidence references, B. Peters updated non-caregiver analysis and To Do list 1.80	\$950.00	1.8	\$1,710.00								
	7/15/2021	David Marks	Teleconference with Attorney Thornton regarding job description references from Attorney Umpierre .10	\$950.00	0.1	\$95.00								
	7/15/2021	David Marks	Draft summary of findings section to include in reply declaration 1.90	\$950.00	1.9	\$1,805.00								
	7/15/2021	David Marks	Compose email to Attorney Healey regarding summary section of declaration .10	\$950.00	0.1	\$95.00								
	7/15/2021	David Marks	Zoom meeting with Diane Asher regarding format of declaration and related matters .30	\$950.00	0.3	\$285.00								
	7/15/2021	David Marks	Compose email to Attorneys Healey and Umpierre enclosing draft summary of key findings with request for input .10	\$950.00	0.1	\$95.00								
	7/15/2021	David Marks	Teleconference with Schroyer regarding status and staffing shortfall per resident per day .30	\$950.00	0.3	\$285.00								
	7/15/2021	David Marks	Receipt and review email from Schroyer regarding edits to Reply Declaration .20	\$950.00	0.2	\$190.00								
	7/15/2021	David Marks	Teleconference with Attorney Thornton regarding status of edits and Schroyer edits (concerning averages of shortfalls per resident day .40	\$950.00	0.4	\$380.00								
	7/15/2021	David Marks	Receipt and review email from Attorney Thornton regarding Schroyer's edits to his declaration .10	\$950.00	0.1	\$95.00								
	7/15/2021	David Marks	Review Attorney Thornton's final edits regarding non-caregiver Hr PPD .40	\$950.00	0.4	\$380.00								
	7/15/2021	David Marks	GoToMeeting with Attorney Thornton regarding final edits to D. Schroyer for Schroyer Reply Declaration and Reply Brief 1.10	\$950.00	1.1	\$1,045.00								
	7/15/2021	David Marks	Teleconference with Attorney Thornton regarding FN 24 simulation sources/textbooks and formatting .20	\$950.00	0.2	\$190.00								
	7/15/2021	David Marks	Schroyer Declaration complete .30	\$950.00	0.3	\$285.00								
	7/15/2021	David Marks	Receipt and review Attorney Healey's draft Reply Brief, then edit and comment same .80	\$950.00	0.8	\$760.00								
	7/15/2021	David Marks	Telephone call with Attorney Healey regarding Reply Brief and Schroyer Reply Declaration inserts .20	\$950.00	0.2	\$190.00								
	7/15/2021	David Marks	Compose email to Attorney Healey transmitting final draft reply declaration explaining key paragraphs and reason MedModel testing should be given a prominent place in reply brief .50	\$950.00	0.5	\$475.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
7/15/2021	David Marks	Receipt and review multiple emails from Attorney Umpierre regarding FN 6, and newly found data by Sunrise .10	\$950.00	0.1	\$95.00								
7/15/2021	David Marks	Work with Diane Asher on additional revisions to Reply Declaration of Dale Schroyer 3.7	\$950.00	3.7	\$3,515.00								
7/15/2021	Sterling Meachen	Received San Rafael Floorplan pdf and drew out rooms and activities areas by color code into Adobe Illustrator	\$225.00	3.8	\$855.00								
7/15/2021	Diane Asher	Meet with Attorney Marks re: format of declaration and other matters	\$85.00	0.3	\$25.50								
7/15/2021	Diane Asher	Assist Attorney Marks re: drafting summary of findings section	\$85.00	1.5	\$127.50								
7/15/2021	Jim Thornton	GoToMeetings and multiple calls w/David Marks regarding Dale Schroyer declaration 4.1	\$500.00	4.1	\$2,050.00								
7/15/2021	Jim Thornton	Work on bates numbering of exhibits and adding references to dec 3.1	\$500.00	3.1	\$1,550.00								
7/15/2021	Jim Thornton	Work on incorporating all requested changes to Dale Schroyer Dec and finalizing same 2.1	\$500.00	2.1	\$1,050.00								
7/15/2021	Jim Thornton	Received and reviewed numerous related emails .5	\$500.00	0.5	\$250.00								
7/15/2021	Jim Thornton	Received and reviewed email from Blake Peters regarding analysis of non-caregiver time .3	\$500.00	0.3	\$150.00								
7/16/2021	David Marks	Receipt and review new draft reply brief from Attorney Healey .20	\$950.00	0.2	\$190.00								
7/16/2021	David Marks	Receipt and review email from Attorney Healey regarding clarification of travel "within the facility" .30	\$950.00	0.3	\$285.00								
7/16/2021	David Marks	Teleconference with Attorney Thornton regarding travel within bundling clarification and recent letter from Defendant about producing "new" assessment info .10	\$950.00	0.1	\$95.00								
7/16/2021	David Marks	Revise final Dale Schroyer Reply Declaration to include travel under bundling clarification (paragraphs 12 and 70) .20	\$950.00	0.2	\$190.00								
7/16/2021	David Marks	Receipt and review email from Attorney Healey regarding "new" assessment data Sunrise now claims to have found .30	\$950.00	0.3	\$285.00								
7/16/2021	David Marks	Propose edits to declaration regarding same .10	\$950.00	0.1	\$95.00								
7/16/2021	David Marks	Receipt and review from Attorney Wallace changes to Reply Brief .30	\$950.00	0.3	\$285.00								
7/16/2021	David Marks	Continue review of Attorney Healey updated Reply Brief .80	\$950.00	0.8	\$760.00								
7/16/2021	David Marks	Review and edit draft language for inclusion pertinent to Schroyer Reply Declaration 1.20	\$950.00	1.2	\$1,140.00								
7/16/2021	David Marks	Review Lacey depo for travel time .10	\$950.00	0.1	\$95.00								
7/16/2021	David Marks	Compose email to CA Team regarding reason ProModel vs. MedModel used in reply and whether a FN is needed .10	\$950.00	0.1	\$95.00								
7/16/2021	David Marks	Teleconference with Attorney Thornton regarding reply brief edits .10	\$950.00	0.1	\$95.00								
7/16/2021	David Marks	Teleconference with Attorney Healey regarding status of my reply brief edits .10	\$950.00	0.1	\$95.00								
7/16/2021	David Marks	GoToMeeting with Attorney Thornton regarding Reply Brief .40	\$950.00	0.4	\$380.00								
7/16/2021	David Marks	Receive, review and research to timing issue of DES completion due to failure to produce assessment data .50	\$950.00	0.5	\$475.00								
7/16/2021	David Marks	Teleconference with Attorney Thornton to discuss same .20	\$950.00	0.2	\$190.00								
7/16/2021	David Marks	Edit same .20	\$950.00	0.2	\$190.00								
7/16/2021	David Marks	Receipt and review emails from Attorney Healey regarding status of Reply Brief revision .10	\$950.00	0.1	\$95.00								
7/16/2021	David Marks	Edit and draft language for class Reply Brief 1.5	\$950.00	1.5	\$1,425.00								

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
							<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	7/16/2021	David Marks	GoToMeeting with Attorney Thornton regarding both our edits to Reply Brief [.3]	\$950.00	0.3	\$285.00								
	7/16/2021	David Marks	Final edits to Schroyer Reply Declaration regarding travel time [.10]	\$950.00	0.1	\$95.00								
	7/16/2021	David Marks	Compose email to Attorney Healey regarding ProModel reference in reply brief [.20]	\$950.00	0.2	\$190.00								
	7/16/2021	David Marks	Receipt, review and respond to calls and emails from Schroyer regarding execution of declaration [.30]	\$950.00	0.3	\$285.00								
	7/16/2021	Diane Asher	Assist Attorney Marks re: language to include to Dale Schroyer reply declaration	\$85.00	0.8	\$68.00								
	7/16/2021	Diane Asher	Assist in drafting Class Reply Brief	\$85.00	1.5	\$127.50								
	7/16/2021	Jim Thornton	GoToMeeting w/ Blake Peters regarding caregiver definitions [.9]	\$500.00	0.9	\$450.00								
	7/16/2021	Jim Thornton	GoToMeetings and calls w/ David Marks regarding reply brief [1.1]	\$500.00	1.1	\$550.00								
	7/16/2021	Jim Thornton	Work on scenario inputs for Dale Schroyer [.3]	\$500.00	0.3	\$150.00								
	7/16/2021	Jim Thornton	Work on finalizing Dale Schroyer Reply Dec and obtaining signature from Dale Schroyer [1.1]	\$500.00	1.1	\$550.00								
	7/16/2021	Jim Thornton	Sent final signed dec to team [.1]	\$500.00	0.1	\$50.00								
	7/16/2021	Jim Thornton	Requested programming and logic files from Dale Schroyer [.2]	\$500.00	0.2	\$100.00								
	7/19/2021	David Marks	Organize and file key source documents supporting Dale Schroyer Reply Declaration [.40]	\$950.00	0.4	\$380.00								
	7/19/2021	David Marks	Receipt and review email from Attorney Healey regarding family and former Sunrise employee witness disclosures [.10]	\$950.00	0.1	\$95.00								
	7/19/2021	David Marks	Compose email to Attorney Thornton regarding family and former Sunrise employee witnesses located interviewed by Harry Fleming [.20]	\$950.00	0.2	\$190.00								
	7/19/2021	Sterling Meachen	Went into Google Earth for Sunrise Floorplan homes and measured out dimensions of each building, added to graphic and screen grabbed for simulation use	\$225.00	3.3	\$742.50								
	7/19/2021	Jim Thornton	Emails from and to Brian Umpierre regarding production schedule [.2]	\$500.00	0.2	\$100.00								
	7/21/2021	David Marks	Teleconference with Attorney Thornton regarding status of production of all programming language data inputs supporting DES previously discussed, check of the production by ProModel and Dr. Jones' project status [.40]	\$950.00	0.4	\$380.00								
	7/21/2021	David Marks	Compose email to Dr. John Schnelle and Sandra Simmons regarding Alzheimer's ALF research [.60]	\$950.00	0.6	\$570.00								
	7/21/2021	David Marks	Compose email to Attorney Healey regarding deadline for production of supporting documents for Dale Shroyer Reply Declaration [.10]	\$950.00	0.1	\$95.00								
	7/21/2021	David Marks	Receipt and review multiple emails from Attorneys Umpierre and Healey regarding deadline for producing support for Schroyer Reply Declaration [.20]	\$950.00	0.2	\$190.00								
	7/21/2021	David Marks	Teleconference with Attorney Thornton regarding architecture of document production supporting Schroyer Reply Declaration [.20]	\$950.00	0.2	\$190.00								
	7/21/2021	David Marks	Pre-meeting review of document categories and exhibits supporting Schroyer Reply Declaration [1.00]	\$950.00	1	\$950.00								

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						<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
7/21/2021	David Marks	Teleconference with Attorney Thornton regarding supporting documents to be produced to Defendant for Schroyer Reply Declaration .50	\$950.00	0.5	\$475.00								
7/21/2021	Jim Thornton	GoToMeeting w/ Brian Umpierre regarding production of expert materials .4	\$500.00	0.4	\$200.00								
7/21/2021	Jim Thornton	Work on collection of materials and bates numbering 1.5	\$500.00	1.5	\$750.00								
7/21/2021	Jim Thornton	Work on detailed transmittal letter with explanation of all items produced with bates numbers/architecture 1.3	\$500.00	1.3	\$650.00								
7/21/2021	Jim Thornton	Sent production explanation to David Marks and multiple calls from him regarding same 1.2	\$500.00	1.2	\$600.00								
7/21/2021	Jim Thornton	W/on Table of DES Testing .5	\$500.00	0.5	\$250.00								
7/22/2021	David Marks	Teleconference with Attorney Thornton regarding "Active X" spreadsheets (now called Model Logic" spreadsheets .30	\$950.00	0.3	\$285.00								
7/22/2021	David Marks	Receipt and review emails from Attorney Thornton regarding Sunrise escort logic .10	\$950.00	0.1	\$95.00								
7/22/2021	David Marks	Teleconference with Attorney Thornton regarding status of producing supporting documents for Dale Schroyer reply declaration .20	\$950.00	0.2	\$190.00								
7/22/2021	David Marks	Prep for teleconference with Attorney Thornton regarding logic regarding staff escort question .40	\$950.00	0.4	\$380.00								
7/22/2021	David Marks	Three teleconferences with Attorney Thornton regarding Schroyer's findings on the question of whether staff escort to DR was used or not used .50	\$950.00	0.5	\$475.00								
7/22/2021	David Marks	Transmittal to Attorneys Healey, Umpierre and Johnson explaining the documents produced in support of Schroyer Reply Declaration and attaching link to documents .40	\$950.00	0.4	\$380.00								
7/22/2021	Jim Thornton	GoToMeeting with Blake Peters regarding production .4	\$500.00	0.4	\$200.00								
7/22/2021	Jim Thornton	GoToMeetings with Dale Schroyer regarding Sunrise model materials 1.9	\$500.00	1.9	\$950.00								
7/22/2021	Jim Thornton	Continue work on detailed transmittal letter with explanation of all items produced with bates numbers 1.3	\$500.00	1.3	\$650.00								
7/22/2021	Jim Thornton	Multiple calls with David Marks regarding production and issue of escorting to dining room in DES testing 1.0	\$500.00	1	\$500.00								
7/23/2021	David Marks	Compose email to Attorney Healey regarding complicated August calendar/deadline .10	\$950.00	0.1	\$95.00								
7/23/2021	David Marks	Teleconference with Attorney Healey to discuss August calendar .20	\$950.00	0.2	\$190.00								
7/23/2021	David Marks	Teleconference with Attorney Healey regarding Sunrise August calendar and potential of Dale Schroyer depo .30	\$950.00	0.3	\$285.00								
7/23/2021	David Marks	Receipt and review Plaintiff's opposition to Defendant's Motion to Strike Schroyer original declaration, and Defendant's renewed MTS Schroyer declaration .80	\$950.00	0.8	\$760.00								
7/23/2021	Jim Thornton	Received and reviewed notice of our production of reciprocal expert materials .3	\$500.00	0.3	\$150.00								
7/23/2021	Jim Thornton	Received and reviewed email regarding deadline for opposition to MTS Schroyer .2	\$500.00	0.2	\$100.00								
7/24/2021	David Marks	Continue review of Plaintiff's opposition to Defendant's Motion to Strike Schroyer original declaration, and Defendant's renewed MTS Schroyer declaration .60	\$950.00	0.6	\$570.00								
7/24/2021	Jim Thornton	Email from David Marks regarding MTS Dale Schroyer Dec .2	\$500.00	0.2	\$100.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
7/27/2021	David Marks	Review expert witness invoices and ledger of funds advanced to experts by MBGY [.30]	\$950.00	0.3	\$285.00								
7/27/2021	Jim Thornton	Received and reviewed emails regarding request for .mod files [.4]	\$500.00	0.4	\$200.00								
7/28/2021	David Marks	Compose email to Attorney Healey regarding funding required/past due [.20]	\$950.00	0.2	\$190.00								
7/28/2021	David Marks	Teleconference with Clayton Cain regarding same [.20]	\$950.00	0.2	\$190.00								
7/28/2021	David Marks	Edit opposition to Motion to Strike Schroyer Declaration [.40]	\$950.00	0.4	\$380.00								
7/28/2021	David Marks	Compose email to Attorney Healey and CA Team regarding opposition to MTS Schroyer Declaration [.10]	\$950.00	0.1	\$95.00								
7/28/2021	David Marks	Teleconference with Attorney Thornton regarding opposition to MTS Schroyer Declaration [.40]	\$950.00	0.4	\$380.00								
7/28/2021	David Marks	Receipt and email from Attorney Umpierre transmitting proposed email to Sunrise regarding .MOD file request [.10]	\$950.00	0.1	\$95.00								
7/28/2021	David Marks	Teleconference with Attorney Thornton to discuss same [.20]	\$950.00	0.2	\$190.00								
7/28/2021	David Marks	Review/research how MOD packages were handled in Aegis and how ProModel handles, and the costs of producing MOD packages [.50]	\$950.00	0.5	\$475.00								
7/28/2021	David Marks	Receipt and review, and compose emails to and from CA Team regarding conference call regarding pro-model proprietary software [.20]	\$950.00	0.2	\$190.00								
7/28/2021	Jim Thornton	Received and reviewed emails regarding .mod files from Chris Healey [.3]	\$500.00	0.3	\$150.00								
7/28/2021	Jim Thornton	Review of Opposition to Mtn to Strike Schroyer and highlighted key portion [.5]	\$500.00	0.5	\$250.00								
7/28/2021	Jim Thornton	Sent highlighted opposition to David Marks [.1]	\$500.00	0.1	\$50.00								
7/28/2021	Jim Thornton	Call and work with David Marks regarding revisions to Opposition to Mtn to Strike Schroyer [.4]	\$500.00	0.4	\$200.00								
7/28/2021	Jim Thornton	Sent revisions of Opposition to Mtn to Strike Schroyer to David Marks [.3]	\$500.00	0.3	\$150.00								
7/28/2021	Jim Thornton	Received and reviewed emails related to Sunrise's demands for .mod files [.3]	\$500.00	0.3	\$150.00								
7/28/2021	Jim Thornton	call with David Marks regarding past handling .mod file issue and inspection [.2]	\$500.00	0.2	\$100.00								
7/29/2021	David Marks	Teleconference with Attorney Thornton regarding MOD file product [.30]	\$950.00	0.3	\$285.00								
7/29/2021	Jim Thornton	Emails to Brian Umpierre regarding bates numbering questions [.3]	\$500.00	0.3	\$150.00								
7/29/2021	Jim Thornton	Call with David Marks regarding MOD files and production [.3]	\$500.00	0.3	\$150.00								
7/30/2021	David Marks	Teleconference with Attorney Thornton regarding MOD file packages - demonstration and protected MOD file [.60]	\$950.00	0.6	\$570.00								
7/30/2021	Jim Thornton	Received and reviewed emails regarding Schroyer discovery issues [.3]	\$500.00	0.3	\$150.00								
7/30/2021	Jim Thornton	Call with David Marks regarding MOD file packages - demonstration and use of protected MOD file [.6]	\$500.00	0.6	\$300.00								
8/1/2021	Jim Thornton	Received and reviewed emails from California team regarding protective order accusations and proposed response [.4]	\$500.00	0.4	\$200.00								
8/2/2021	David Marks	Receipt and review Gorman emails and letter regarding Dale Schroyer reply declaration - MOD files and Aegis task times [.30]	\$950.00	0.3	\$285.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>	<u>Fees</u>		<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
							<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
8/2/2021	David Marks	Receipt and review email from Attorney Healey transmitting draft response to Gorman's letter/email and Attorney Wallace's comments regarding same .40	\$950.00	0.4	\$380.00									
8/2/2021	David Marks	Teleconference with Attorney Thornton regarding status of MOD file response to Gorman .10	\$950.00	0.1	\$95.00									
8/2/2021	David Marks	GoToMeeting with Attorney Thornton regarding draft response to Gorman (MOD file response) 2.90	\$950.00	2.9	\$2,755.00									
8/2/2021	David Marks	Teleconference with Attorney Umpierre regarding response to Gorman (MOD file) .20	\$950.00	0.2	\$190.00									
8/2/2021	David Marks	Additional GoToMeeting with Attorney Thornton and Dale Schroyer regarding MOD file response to Gorman 1.30	\$950.00	1.3	\$1,235.00									
8/2/2021	David Marks	Teleconference with Attorney Thornton regarding draft revisions to same .30	\$950.00	0.3	\$285.00									
8/2/2021	David Marks	Additional GoToMeeting with Attorneys Umpierre and Thornton relating to proposed MOD file response, and Attorney Healey's response to Gorman's confidentiality attack .50	\$950.00	0.5	\$475.00									
8/2/2021	David Marks	Additional GoToMeeting with Attorney Thornton regarding Attorney Healey's response draft (points we agree with) .70	\$950.00	0.7	\$665.00									
8/2/2021	David Marks	Receipt and review email from Attorney Umpierre containing draft response incorporating mine and Attorney Thornton's draft comments/language .30	\$950.00	0.3	\$285.00									
8/2/2021	David Marks	Compose email to Attorney Umpierre with final comments and thoughts to Gorman response .10	\$950.00	0.1	\$95.00									
8/2/2021	David Marks	Receipt and review multiple emails from Attorney Umpierre regarding other chain data and protective order .30	\$950.00	0.3	\$285.00									
8/2/2021	David Marks	Work on formulation of counter arguments to Sunrise's claim that protective order in Aegis was violated regarding use of Aegis task times .90	\$950.00	0.9	\$855.00									
8/2/2021	Jim Thornton	Multiple calls and GoToMeetings with David Marks and with Brian Umpierre and Dale Schroyer related to .mod file response 4.7	\$500.00	4.7	\$2,350.00									
8/2/2021	Jim Thornton	Work on .mod file issues and response to demand for same .8	\$500.00	0.8	\$400.00									
8/2/2021	Jim Thornton	Work on question of inputs from other California ALF chain .7	\$500.00	0.7	\$350.00									
8/3/2021	David Marks	Teleconference with Attorney Thornton regarding Flores' Sunrise reply declaration and argument regarding protective order .20	\$950.00	0.2	\$190.00									
8/3/2021	David Marks	Draft argument for CA based on Flores' reply declaration regarding "industry" task times (paragraphs 14-18 of Flores reply declaration consistent with support) 1.50	\$950.00	1.5	\$1,425.00									
8/3/2021	David Marks	GoToMeeting with Attorney Thornton regarding question of protective order regarding ProModel proprietary software 1.40	\$950.00	1.4	\$1,330.00									
8/3/2021	Jim Thornton	Received and reviewed multiple emails regarding Aegis protective order allegations .4	\$500.00	0.4	\$200.00									
8/3/2021	Jim Thornton	Calls and GoToMeeting with David Marks regarding email addressing claims and Flores' use of Sunrise task times 1.7	\$500.00	1.7	\$850.00									
8/11/2021	David Marks	Receipt and review email from Attorney Healey regarding protective order in Aegis and potential claim of violation by Sunrise .20	\$950.00	0.2	\$190.00									
8/11/2021	David Marks	Respond to Attorney Healey email regarding same .20	\$950.00	0.2	\$190.00									

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
8/11/2021	Jim Thornton	Received and reviewed draft opposition to MTS Flores from Chris Healey with request for comments .3	\$500.00	0.3	\$150.00								
8/11/2021	Jim Thornton	Received and reviewed emails from David Marks relates to draft Flores Opp .2	\$500.00	0.2	\$100.00								
8/12/2021	Jim Thornton	Received and reviewed draft opposition to MTS Flores from Chris Healey .2	\$500.00	0.2	\$100.00								
8/13/2021	David Marks	Draft my declaration regarding attorney fees .80	\$950.00	0.8	\$760.00								
8/18/2021	David Marks	Review and revise Flores opposition to motion to strike 3.00	\$950.00	3	\$2,850.00								
8/18/2021	David Marks	Teleconference with Attorney Thornton regarding edits set up call to discuss .10	\$950.00	0.1	\$95.00								
8/18/2021	David Marks	Teleconference with Attorney Healey regarding any reason Flores Reply Declaration not used in MTS .10	\$950.00	0.1	\$95.00								
8/18/2021	David Marks	Plan regarding edits .20	\$950.00	0.2	\$190.00								
8/18/2021	David Marks	Teleconference with Attorney Thornton regarding schedule of GoToMeeting for tonight to discuss DTM edits and Attorney Thornton edits .10	\$950.00	0.1	\$95.00								
8/18/2021	David Marks	GoToMeeting with Attorney Thornton to discuss edits to and revise opposition to MTS Dr. Flores Declaration 1.70	\$950.00	1.7	\$1,615.00								
8/18/2021	Jim Thornton	Received and reviewed David Marks comments regarding opposition to MTS Flores .3	\$500.00	0.3	\$150.00								
8/18/2021	Jim Thornton	GoToMeeting w/David Marks regarding draft Flores Opp 1.7	\$500.00	1.7	\$850.00								
8/18/2021	Jim Thornton	Sent latest draft to David Marks .2	\$500.00	0.2	\$100.00								
8/18/2021	Jim Thornton	Calls with David Marks setting up GoToMeeting to work on Flores Opp dec and related questions .3	\$500.00	0.3	\$150.00								
8/19/2021	David Marks	Finalize edits to opposition to motion to strike Flores declaration 2.90	\$950.00	2.9	\$2,755.00								
8/19/2021	David Marks	Review Flores Reply Declaration (paragraphs 10-12 and 19) .30	\$950.00	0.3	\$285.00								
8/19/2021	David Marks	Compose email to CA Team regarding edits to opposition to motion to strike Flores declaration .20	\$950.00	0.2	\$190.00								
8/19/2021	Jim Thornton	Received and reviewed edits to Opposition to MTS Flores from David Marks .1	\$500.00	0.1	\$50.00								
8/19/2021	Jim Thornton	Received and reviewed emails regarding Sunrise's use of task time study appearing in opposition to MTS Flores .4	\$500.00	0.4	\$200.00								
8/20/2021	Jim Thornton	Emails with California team regarding timing of Dale Schroyer analysis .4	\$500.00	0.4	\$200.00								
8/21/2021	Jim Thornton	Received and reviewed emails regarding upcoming hearing and accusations that we delayed analysis .3	\$500.00	0.3	\$150.00								
8/21/2021	Jim Thornton	Work with Blake Peters regarding timeline of production of data to us .3	\$500.00	0.3	\$150.00								
8/22/2021	Jim Thornton	Received and reviewed emails regarding surreply and status of hearing .2	\$500.00	0.2	\$100.00								
8/23/2021	David Marks	Teleconference with Attorney Thornton regarding Sunrise sur-reply to Dale Schroyer declaration and timeline of production .10	\$950.00	0.1	\$95.00								
8/23/2021	David Marks	GoToMeeting with Attorney Thornton regarding Sunrise timeline of assessment/staffing production .40	\$950.00	0.4	\$380.00								
8/23/2021	David Marks	Draft key points explanation of timeline of Sunrise production 1.50	\$950.00	1.5	\$1,425.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked		General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
8/23/2021	David Marks	GoToMeeting with Attorneys G. Wallace, M. Johnson, and J. Thornton regarding B. Peters' processing of additional data production by Sunrise in May 2021 and timeline of productions that impacted Schroyer/Flores analysis 1.10	\$950.00	1.3	\$1,235.00								
8/23/2021	David Marks	Receipt and review multiple emails from Attorneys Healey and Wallace from Friday - Sunday (Aug. 20-22) regarding sur-reply and To Do list .60	\$950.00	0.6	\$570.00								
8/23/2021	David Marks	Review Sunrise sur-reply and formulate counter arguments and proof, and Defendant's MTS Schroyer Reply Declaration .70	\$950.00	0.7	\$665.00								
8/23/2021	David Marks	GoToMeeting with Attorney Thornton regarding final changes to timeline of missing documents 1.70	\$950.00	1.7	\$1,615.00								
8/23/2021	David Marks	Review and reply to noticer of errata May 2020 vs. May 2021 .20	\$950.00	0.2	\$190.00								
8/23/2021	David Marks	Receipt and review email from Attorney Wallace regarding his opposition to Defendant's request for sur-reply .80	\$950.00	0.8	\$760.00								
8/23/2021	David Marks	Compose response email to Attorney Wallace with suggested changes and edits to the opposition to Defendant's request for sur-reply .30	\$950.00	0.3	\$285.00								
8/23/2021	David Marks	Teleconference with Attorney Healey regarding errata - conclusion of error May 2020 - May 2021 .20	\$950.00	0.2	\$190.00								
8/23/2021	Diane Asher	Assist Attorney Marks re: key points explanation of timeline of Sunrise production	\$85.00	1.5	\$127.50								
8/23/2021	Jim Thornton	GoToMeetings with Blake Peters regarding various aspects of document production .4	\$500.00	0.4	\$200.00								
8/23/2021	Jim Thornton	GoToMeeting w/Guy Wallace, Mark Johnson, RS, David Marks regarding document production 1.1	\$500.00	1.1	\$550.00								
8/23/2021	Jim Thornton	GoToMeetings with David Marks regarding production and independent work on same 2.1	\$500.00	2.1	\$1,050.00								
8/23/2021	Jim Thornton	Received and reviewed emails with Blake Peters regarding receipt of data and history of production .4	\$500.00	0.4	\$200.00								
8/23/2021	Jim Thornton	Emails to Blake Peters regarding history of production .3	\$500.00	0.3	\$150.00								
8/23/2021	Jim Thornton	Prepared email to David Marks summarizing production history .4	\$500.00	0.4	\$200.00								
8/23/2021	Jim Thornton	Emails with Brian Umpierre regarding sur-reply .1	\$500.00	0.1	\$50.00								
8/24/2021	David Marks	Receipt and review Attorney Healey's request for arguments to counter Sunrise attack and MedModel DES .20	\$950.00	0.2	\$190.00								
8/24/2021	Jim Thornton	Received and reviewed multiple emails regarding expert materials .3	\$500.00	0.3	\$150.00								
8/25/2021	David Marks	Teleconference with Attorney Healey regarding certification hearing and triangular distribution .30	\$950.00	0.3	\$285.00								
8/25/2021	Jim Thornton	Review of SurReply and created list of simulation related attacks and responses 3.2	\$500.00	3.2	\$1,600.00								
8/25/2021	Jim Thornton	Emailed list of attacks to David Marks .2	\$500.00	0.2	\$100.00								
8/26/2021	David Marks	Prep for court hearing regarding attack on simulation in sur-reply .50	\$950.00	0.5	\$475.00								
8/26/2021	David Marks	Three GoToMeetings with Attorney Thornton to prep for court hearing and regarding sur-reply 4.10	\$950.00	4.1	\$3,895.00								
8/26/2021	Jim Thornton	GoToMeetings w/David Marks regarding sur reply attacks and responses 4.1	\$500.00	4.1	\$2,050.00								
8/26/2021	Jim Thornton	Work on responses and sent to David Marks .9	\$500.00	0.9	\$450.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
8/27/2021	Jim Thornton	Multiple emails from and to Chris Healey regarding .mod file and data provided [.4]	\$500.00	0.4	\$200.00								
8/27/2021	Jim Thornton	Received and reviewed email from David Marks regarding protected package files offered [.3]	\$500.00	0.3	\$150.00								
8/30/2021	Jim Thornton	Received and reviewed summaries of last Friday's hearing on motion for class cert [.4]	\$500.00	0.4	\$200.00								
9/1/2021	David Marks	Review Sunrise new billing from Schroyer and Flores [.20]	\$950.00	0.2	\$190.00								
9/1/2021	David Marks	Teleconference with Clayton Cain to discuss updated expert invoice/payment spreadsheet [.20]	\$950.00	0.2	\$190.00								
9/2/2021	David Marks	Organize file infusing pleadings, drafts, correspondence, etc. [2.00]	\$950.00	2	\$1,900.00								
9/8/2021	Jacques Balette	Meeting with Attorney Marks re: Watermark/Sunrise lease agreement, obligations and representations	\$750.00	0.2	\$150.00								
9/8/2021	David Marks	Receipt and review email from Attorney Healey regarding Watermark/Sunrise lease agreement [.30]	\$950.00	0.3	\$285.00								
9/8/2021	David Marks	Meeting with Attorney Balette regarding source of same [.20]	\$950.00	0.2	\$190.00								
9/8/2021	David Marks	Teleconference with Attorney Healey regarding Oct. 1 deadline for MTS [.40]	\$950.00	0.4	\$380.00								
9/8/2021	Jim Thornton	Briefly received and reviewed mediation statement [.2]	\$500.00	0.2	\$100.00								
9/8/2021	Jim Thornton	Received and reviewed email from Chris Healey regarding protective order question [.2]	\$500.00	0.2	\$100.00								
9/9/2021	Jacques Balette	Confer with Attorney Marks regarding Brad Rush deposition and use of Watermark materials [.3]	\$750.00	0.3	\$225.00								
9/9/2021	Jacques Balette	Email attorneys regarding source and admissibility of Watermark materials [.2]	\$750.00	0.2	\$150.00								
9/9/2021	David Marks	Review email for Attorney Healey regarding origin of Watermark lease with Sunrise and accounting info referenced in B. Rush's depo [.10]	\$950.00	0.1	\$95.00								
9/9/2021	David Marks	Teleconference with Attorney Balette to discuss B. Rush depo [.30]	\$950.00	0.3	\$285.00								
9/9/2021	David Marks	Receipt and review email from Attorney Balette regarding origin of lease between Sunrise watermarks [.20]	\$950.00	0.2	\$190.00								
9/9/2021	David Marks	Review pending expert invoices and funding of expert invoices that have been paid/unpaid [.80]	\$950.00	0.8	\$760.00								
9/9/2021	David Marks	Update expert invoice spreadsheet [.40]	\$950.00	0.4	\$380.00								
9/9/2021	David Marks	Compose email to Attorney Healey regarding transmitting new expert invoices and explanation of funding required [.30]	\$950.00	0.3	\$285.00								
9/9/2021	David Marks	Review Joint Stipulation to Amend Scheduling Order [.10]	\$950.00	0.1	\$95.00								
9/9/2021	Jim Thornton	Received and reviewed scheduling order [.2]	\$500.00	0.2	\$100.00								
9/10/2021	David Marks	Receipt and review email from Attorney Umpierre regarding updated scheduling order [.10]	\$950.00	0.1	\$95.00								
9/10/2021	David Marks	File same [.10]	\$950.00	0.1	\$95.00								
9/10/2021	David Marks	Compose email to Attorney Umpierre responding to email regarding updated scheduling order [.20]	\$950.00	0.2	\$190.00								
9/10/2021	David Marks	Compose email to Attorney Thornton regarding same [.10]	\$950.00	0.1	\$95.00								
9/10/2021	David Marks	Teleconference with Attorney Thornton to discuss status of production outstanding discovery [.50]	\$950.00	0.5	\$475.00								
9/10/2021	David Marks	Draft response to deadline and concerns if Sunrise drags feet on document production [1.0]	\$950.00	1	\$950.00								
9/10/2021	Jim Thornton	Calls with David Marks regarding availability of data required for further MedModel analysis [.6]	\$500.00	0.6	\$300.00								

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
							<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	9/10/2021	Jim Thornton	Calls with Blake Peters regarding data required .2	\$500.00	0.2	\$100.00								
	9/10/2021	Jim Thornton	Work on review of data available .3	\$500.00	0.3	\$150.00								
	9/10/2021	Jim Thornton	Email to David Marks w/ floor plans .3	\$500.00	0.3	\$150.00								
	9/10/2021	Jim Thornton	Received and reviewed emails from David Marks and California team regarding scheduling .4	\$500.00	0.4	\$200.00								
	9/13/2021	David Marks	Receipt and review Attorneys Healey and Wallace responses to my email regarding proposed schedule and Sunrise history of delays .20	\$950.00	0.2	\$190.00								
	9/13/2021	Jim Thornton	Received and reviewed emails regarding responding to alleged violations of protective order .4	\$500.00	0.4	\$200.00								
	9/14/2021	Jim Thornton	Received and reviewed M&C letter from Brian Umpierre .2	\$500.00	0.2	\$100.00								
	9/16/2021	Jim Thornton	Received and reviewed email regarding MTS Dale Schroyer and response, including various questions .4	\$500.00	0.4	\$200.00								
	9/17/2021	David Marks	Teleconference with Attorney Thornton regarding new reply declaration for Dale Schroyer and status of response to Healey question about task times related to Aegis .40	\$950.00	0.4	\$380.00								
	9/17/2021	Jim Thornton	Received and reviewed emails from David Marks and GW regarding dec of Dale Schroyer to respond to Crandall .4	\$500.00	0.4	\$200.00								
	9/17/2021	Jim Thornton	Received and reviewed frequencies of service codes from Blake Peters .3	\$500.00	0.3	\$150.00								
	9/17/2021	Jim Thornton	Call with David Marks regarding drafting new reply declaration for Dale Schroyer and issue of task times related to Aegis .4	\$500.00	0.4	\$200.00								
	9/20/2021	David Marks	Receipt and review Attorney Wallace's multiple emails on thoughts regarding the opposition to motion to strike Dale Schroyer declaration 1.00	\$950.00	1	\$950.00								
	9/20/2021	David Marks	Receipt and review multiple emails from Attorney Healey regarding opposition to MTS Schroyer declaration, Kennedy sampling, scheduling Kennedy teleconference, Schroyer MTS, data points, and update on expert costs .80	\$950.00	0.8	\$760.00								
	9/20/2021	David Marks	Prep for teleconference with Kennedy and review service history analysis .90	\$950.00	0.9	\$855.00								
	9/20/2021	David Marks	TeamViewer call with Attorney Thornton regarding service history extrapolation 1.30	\$950.00	1.3	\$1,235.00								
	9/20/2021	David Marks	Receipt and review email from Attorney Healey regarding Kennedy teleconference .10	\$950.00	0.1	\$95.00								
	9/20/2021	David Marks	Teleconference with Attorney Healey regarding Kennedy call .10	\$950.00	0.1	\$95.00								
	9/20/2021	Jim Thornton	Work on draft of declaration for Dale Schroyer in support of Opposition to MTS Reply Dec 4.5	\$500.00	4.5	\$2,250.00								
	9/20/2021	Jim Thornton	Prep for meeting on billing service history .7	\$500.00	0.7	\$350.00								
	9/20/2021	Jim Thornton	Pulled prior analysis and extrapolation attempts and sent to David Marks, Blake Peters .7	\$500.00	0.7	\$350.00								
	9/20/2021	Jim Thornton	GoToMeeting w/David Marks regarding extrapolation and billing service history 1.3	\$500.00	1.3	\$650.00								
	9/21/2021	David Marks	Prep for conference call with Pat Kennedy, and review B. Peters' service history analysis by service level .80	\$950.00	0.8	\$760.00								
	9/21/2021	David Marks	GoToMeeting with Attorney Thornton regarding prep for Kennedy call .20	\$950.00	0.2	\$190.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
9/21/2021	David Marks	Conference call with Dr. Kennedy, Attorneys Healey, Wallace, Umpierre and Thornton regarding sampling process, 95 confidence levels, B. Peters' service levels analysis, consider pulling a sample of assessments for reach service level, floor plan differences, and send data to Dr. Kennedy 1.10	\$950.00	1.1	\$1,045.00								
9/21/2021	David Marks	Teleconference with Attorney Thornton regarding Dale Schroyer reply declaration for MTS .10	\$950.00	0.1	\$95.00								
9/21/2021	David Marks	GoToMeeting with Attorney Thornton regarding Schroyer reply declaration for MTS (responding to Crandall's claims) 1.00	\$950.00	1	\$950.00								
9/21/2021	David Marks	Review of B. Peters' analysis of quantity/percent of 8 services deriving from Aegis task times .30	\$950.00	0.3	\$285.00								
9/21/2021	David Marks	GoToMeeting with CA team, Dr. Kennedy, and Attorney Thornton regarding sampling protocol to be used by Dr. Kennedy .60	\$950.00	0.6	\$570.00			0.6	570				
9/21/2021	Jim Thornton	GoToMeeting w/ David Marks regarding Dale Schroyer dec and opposition to MTS 1.0	\$500.00	1	\$500.00								
9/21/2021	Jim Thornton	Emails to David Marks regarding attachments to MTS .2	\$500.00	0.2	\$100.00								
9/21/2021	Jim Thornton	Prep for and attend GoToMeeting with California team, Dr. Kennedy, and David Marks regarding sampling protocol 1.0	\$500.00	1	\$500.00			1	500				
9/21/2021	Jim Thornton	Email to Blake Peters regarding possible sampling concepts .4	\$500.00	0.4	\$200.00								
9/21/2021	Jim Thornton	GoToMeeting w/ David Marks regarding extrapolation attempts .2	\$500.00	0.2	\$100.00								
9/21/2021	Jim Thornton	GoToMeeting w/Blake Peters regarding billing service history extrapolation project .2	\$500.00	0.2	\$100.00								
9/21/2021	Jim Thornton	Created detailed breakdown by service category spreadsheet template for Blake Peters and sent to him .8	\$500.00	0.8	\$400.00								
9/21/2021	Jim Thornton	Work on edits to breakdown by service category spreadsheet .5	\$500.00	0.5	\$250.00								
9/21/2021	Jim Thornton	Received and reviewed billing service history for San Mateo and San Raphael and sent to Blake Peters .3	\$500.00	0.3	\$150.00								
9/21/2021	Jim Thornton	Email to Chris Healey, Brian Umpierre, and David Marks regarding billing history info request .2	\$500.00	0.2	\$100.00								
9/21/2021	Jim Thornton	Conference call with Dr. Kennedy, Chris Healey, Guy Wallace, Brian Umpierre, and David Marks regarding sampling process, 95% confidence intervals, request to pull and send to Dr. Kennedy sample assessments for each service level and floor plan info 1.1	\$500.00	1.1	\$550.00								
9/21/2021	Jim Thornton	Call with David Marks regarding Dale Schroyer reply declaration for MTS .1	\$500.00	0.1	\$50.00								
9/22/2021	David Marks	Teleconference with Dr. Jones regarding status QA data project .30	\$950.00	0.3	\$285.00								
9/22/2021	David Marks	GoToMeeting with Attorney Thornton regarding memo about .MOD file .70	\$950.00	0.7	\$665.00								
9/22/2021	David Marks	Review Dave Tucker description of .MOD File vs. PKG .20	\$950.00	0.2	\$190.00								
9/22/2021	David Marks	GoToMeeting with Attorney Thornton regarding .MOD file pros/cons and key questions requiring answers 1.50	\$950.00	1.5	\$1,425.00								
9/22/2021	Jim Thornton	Emails to Dale Schroyer and Dave Tucker regarding .mod files and .pkg files .2	\$500.00	0.2	\$100.00								
9/22/2021	Jim Thornton	GoToMeeting w/ Bruce Gladwin regarding .mod file issues .9	\$500.00	0.9	\$450.00								
9/22/2021	Jim Thornton	GoToMeeting w/ Rich Feldman regarding definitions of .pkg and .mod files .8	\$500.00	0.8	\$400.00								

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
							<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	9/22/2021	Jim Thornton	GoToMeetings w/ David Marks regarding package files and Dale Schroyer dec 2.2	\$500.00	2.2	\$1,100.00								
	9/23/2021	David Marks	Review memo based on expert meetings regarding pros/cons, and draft memo regarding same 1.60	\$950.00	1.6	\$1,520.00								
	9/23/2021	David Marks	Teleconference to Attorney Thornton regarding Crandall declaration and MTS .2	\$950.00	0.2	\$190.00								
	9/23/2021	David Marks	Review and highlight Crandall Declaration .30	\$950.00	0.3	\$285.00								
	9/23/2021	David Marks	Review Defendants' key points in MTS Schroyer Reply Declaration .50	\$950.00	0.5	\$475.00								
	9/23/2021	David Marks	Summarize key attack points in MTS Schroyer Reply Declaration .40	\$950.00	0.4	\$380.00								
	9/23/2021	David Marks	Compare same to Attorney Wallace road map for opposition to strike memo .20	\$950.00	0.2	\$190.00								
	9/23/2021	David Marks	Work on/incorporate response to MTS into new Schroyer Reply Declaration 1.90	\$950.00	1.9	\$1,805.00								
	9/23/2021	David Marks	GoToMeeting with Attorney Thornton to discuss architecture of Schroyer Reply Declaration in opposition to MTS reply declaration 2.70	\$950.00	2.7	\$2,565.00								
	9/23/2021	David Marks	Review Attorney Umpierre 8.2.21 letter .10	\$950.00	0.1	\$95.00								
	9/23/2021	David Marks	Receipt and review Attorney Healey letter and correction .70	\$950.00	0.7	\$665.00								
	9/23/2021	David Marks	2 teleconferences with Attorney Thornton regarding same .20	\$950.00	0.2	\$190.00								
	9/23/2021	David Marks	Teleconference with Attorney Thornton to discuss Attorney Healey's letter to Aegis re: waiver of protective order/confidential task times and Attorney Thornton's review/search - 8 out of 122 confidential/protected task times not found in Schroyer reply declaration .20	\$950.00	0.2	\$190.00								
	9/23/2021	David Marks	Receipt and review CA Team correspondence regarding Aegis waiver .10	\$950.00	0.1	\$95.00								
	9/23/2021	David Marks	Review and edit of Schroyer reply declaration for opposition to MTS Schroyer Reply Declaration 1.80	\$950.00	1.8	\$1,710.00								
	9/23/2021	Diane Asher	Assist Attorney Marks re: drafting memo on expert meeting	\$85.00	1.2	\$102.00								
	9/23/2021	Jim Thornton	Received and reviewed David Marks email regarding Dale Schroyer dec and comments .2	\$500.00	0.2	\$100.00								
	9/23/2021	Jim Thornton	GoToMeeting w/ David Marks regarding opposition to MTS and Schroyer reply dec 2.7	\$500.00	2.7	\$1,350.00								
	9/23/2021	Jim Thornton	Sent David Marks Crandall dec .2	\$500.00	0.2	\$100.00								
	9/23/2021	Jim Thornton	Highlighted Crandall dec and sent to David Marks .2	\$500.00	0.2	\$100.00								
	9/23/2021	Jim Thornton	Pulled quotes for inclusion in Schroyer dec .3	\$500.00	0.3	\$150.00								
	9/23/2021	Jim Thornton	Work on analysis of "Other ALF Chain" task times and sent to David Marks 1.8	\$500.00	1.8	\$900.00								
	9/23/2021	Jim Thornton	Review of Schroyer Reply Dec regarding "Other ALF Chain" references and reported to David Marks .3	\$500.00	0.3	\$150.00								
	9/23/2021	Jim Thornton	Substantial independent work on Schroyer Dec 2.1	\$500.00	2.1	\$1,050.00								
	9/23/2021	Jim Thornton	Calls with David Marks regarding Aegis protective order and waiver issues .4	\$500.00	0.4	\$200.00								
	9/23/2021	Jim Thornton	Calls with David Marks regarding Crandall dec and MTS same .2	\$500.00	0.2	\$100.00								
	9/24/2021	David Marks	Edit Schroyer Reply Declaration ISO MTS Schroyer Reply Declaration .40	\$950.00	0.4	\$380.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
9/24/2021	David Marks	Prep for teleconference with Attorney Thornton regarding Schroyer reply declaration, and GoToMeeting with Attorney Thornton regarding Dale Schroyer Declaration 1) .MOD file and PKG file, 2) amount of time to create, and 3) and manual creation 3.90]	\$950.00	3.9	\$3,705.00								
9/24/2021	David Marks	GoToMeeting with Attorney Thornton re: Dale Schroyer Declaration and Opposition 2.70]	\$950.00	2.7	\$2,565.00								
9/24/2021	Jim Thornton	GoToMeeting w/David Marks regarding Dale Schroyer Dec 3.9]	\$500.00	3.9	\$1,950.00								
9/24/2021	Jim Thornton	Emails with Brian Umpierre regarding bates numbering of MedModel production .4]	\$500.00	0.4	\$200.00								
9/24/2021	Jim Thornton	GoToMeeting with David Marks regarding Dale Schroyer Dec and Opposition 2.7]	\$500.00	2.7	\$1,350.00								
9/24/2021	Jim Thornton	Emails with Brian Umpierre regarding Bates numbering of Schroyer exhibits .3]	\$500.00	0.3	\$150.00								
9/27/2021	David Marks	Teleconference with Attorney Thornton regarding status and To Do lists for completion of Dale Schroyer Declaration in Opposition to Motion to Strike Reply Declaration .30]	\$950.00	0.3	\$285.00								
9/27/2021	David Marks	Continue edits of Schroyer Declaration, including composing email to CA Team with outline of declaration 4.2]	\$950.00	3.9	\$3,705.00								
9/27/2021	David Marks	Telephone call with Attorney Thornton regarding 3.10.21 date of amended certification file, date all supporting documentation produced to Defendants for Schroyer declaration (7.23.21), and revision of key paragraphs .3]	\$950.00	0.3	\$285.00								
9/27/2021	David Marks	Continue edits to Schroyer declaration 2.30]	\$950.00	2.3	\$2,185.00								
9/27/2021	David Marks	GoToMeeting with Attorney Thornton regarding final draft of Schroyer declaration 5.10]	\$950.00	5.1	\$4,845.00								
9/27/2021	Jim Thornton	Received and reviewed email from David Marks regarding skeletal outline of Dale Schroyer dec .3]	\$500.00	0.3	\$150.00								
9/27/2021	Jim Thornton	Work on a draft dec 2.1]	\$500.00	2.1	\$1,050.00								
9/27/2021	Jim Thornton	GoToMeeting w/ David Marks working on Dale Schroyer dec 3.9]	\$500.00	3.9	\$1,950.00								
9/27/2021	Jim Thornton	GoToMeeting w/ David Marks regarding handling of Dale Schroyer dec 1.2]	\$500.00	1.2	\$600.00								
9/27/2021	Jim Thornton	Call with David Marks regarding status and To Do lists for completion of Dale Schroyer Declaration in Opposition to Motion to Strike Reply Declaration .30]	\$500.00	0.3	\$150.00								
9/27/2021	Jim Thornton	Call with David Marks regarding date of amended certification file, date all supporting documentation produced to Defendants for Schroyer declaration and revision of key paragraphs .3]	\$500.00	0.3	\$150.00								
9/28/2021	David Marks	Teleconference with Attorney Thornton regarding additional points to include in Dale Schroyer declaration .20]	\$950.00	0.2	\$190.00								
9/28/2021	David Marks	Teleconference with Attorney Healey regarding feedback on Schroyer declaration .30]	\$950.00	0.3	\$285.00								
9/28/2021	David Marks	Teleconference with Attorney Thornton regarding refining Schroyer declaration concerning understanding a .MOD file and a .PKG file .30]	\$950.00	0.3	\$285.00								
9/28/2021	Jim Thornton	Call with David Marks regarding additional edits/sections in Dale Schroyer declaration .2]	\$500.00	0.2	\$100.00								
9/28/2021	Jim Thornton	Call with David Marks as to understanding a .MOD file and a .PKG file references in Schroyer dec .3]	\$500.00	0.3	\$150.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
9/29/2021	David Marks	Multiple teleconferences with Attorney Thornton regarding Dale Schroyer declaration and the changes regarding definitions of .MOD and .PKG files, and related issues .30	\$950.00	0.3	\$285.00								
9/29/2021	David Marks	Perform legal research regarding Northern District protection of proprietary software and model protective order and Dynetix 1.30	\$950.00	1.3	\$1,235.00								
9/29/2021	David Marks	Review Schroyer protective order in Sunrise and compare to Northern District Model protective order .30	\$950.00	0.3	\$285.00								
9/29/2021	David Marks	Compose memo to CA Team regarding Dynetix. Northern District Model protective order and applicability to ProModel proprietary model 1.20	\$950.00	1.2	\$1,140.00								
9/29/2021	David Marks	GoToMeeting with Attorney Thornton regarding Dynetix and Northern District Model protective order and input from Schroyer on whether .MOD file and PKG file constituted "highly sensitive info" per Northern District Model protective order 1.00	\$950.00	1	\$950.00								
9/29/2021	David Marks	GoToMeeting with Attorney Thornton regarding update on changes to Schroyer declaration 1.80	\$950.00	1.8	\$1,710.00								
9/29/2021	Jim Thornton	GoToMeeting w/ Dale Schroyer and David Marks regarding Dale Schroyer declaration 1.8	\$500.00	1.8	\$900.00								
9/29/2021	Jim Thornton	GoToMeetings w/ David Marks regarding Dale Schroyer Dec 2.4	\$500.00	2.4	\$1,200.00								
9/29/2021	Jim Thornton	Emails with Brian Umpierre regarding dates of production for inclusion in Dec .5	\$500.00	0.5	\$250.00								
9/29/2021	Jim Thornton	Work on drafting/editing Dec 2.1	\$500.00	2.1	\$1,050.00								
9/29/2021	Jim Thornton	GoToMeeting w/ David Marks regarding Sunrise .mod files 1.0	\$500.00	1	\$500.00								
9/29/2021	Jim Thornton	Multiple calls with David Marks regarding Schroyer dec and definitions of .MOD and .PKG files .3	\$500.00	0.3	\$150.00								
9/30/2021	David Marks	GoToMeeting with Attorney Thornton to work on final Dale Schroyer declaration 2.10	\$950.00	2.1	\$1,995.00								
9/30/2021	David Marks	GoToMeeting with Attorney Thornton and Dale Schroyer regarding same .70	\$950.00	0.7	\$665.00								
9/30/2021	David Marks	Continue edits of Schroyer declaration 1.50	\$950.00	1.5	\$1,425.00								
9/30/2021	David Marks	GoToMeeting with Attorney Thornton regarding additional work to finalize Schroyer declaration 5.20	\$950.00	5.2	\$4,940.00								
9/30/2021	David Marks	GoToMeeting with Attorney Thornton to discuss edits to Attorney Wallace's draft Opposition to MTS Schroyer reply declaration .80	\$950.00	0.8	\$760.00								
9/30/2021	David Marks	Edit Attorney Wallace's draft Opposition to MTS Schroyer Reply Declaration .60	\$950.00	0.6	\$570.00								
9/30/2021	David Marks	Teleconferences with Attorney Healey to discuss source code case law regarding proprietary software .30	\$950.00	0.3	\$285.00								
9/30/2021	Jim Thornton	GoToMeeting with David Marks regarding Dale Schroyer declaration and briefly with Dale Schroyer regarding declaration 5.9	\$500.00	5.9	\$2,950.00								
9/30/2021	Jim Thornton	GoToMeeting with David Marks and with Dale Schroyer regarding declaration 2.1	\$500.00	2.1	\$1,050.00								
9/30/2021	Jim Thornton	Review of and GoToMeeting w/David Marks regarding edits to draft Opposition to MTS Schroyer reply declaration .8	\$500.00	0.8	\$400.00								
9/30/2021	Jim Thornton	Review of and edits to Opposition to MTS 1.3	\$500.00	1.3	\$650.00								
9/30/2021	Jim Thornton	Sent Opposition to MTS to David Marks .1	\$500.00	0.1	\$50.00								

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
							<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	10/1/2021	David Marks	Receipt and review Attorney Wallace's revised opposition to motion to strike Dale Schroyer declaration .70	\$950.00	0.7	\$665.00								
	10/1/2021	David Marks	Teleconferences with Attorney Thornton to discuss plan to finalize Schroyer declaration and incorporate Attorney Healey's case law regarding proprietary source code .20	\$950.00	0.2	\$190.00								
	10/1/2021	David Marks	Receipt and review Attorney Healey's briefing on source code cases [2 emails] .90	\$950.00	0.9	\$855.00								
	10/1/2021	David Marks	Teleconferences with Attorney Healey regarding Schroyer declaration .20	\$950.00	0.2	\$190.00								
	10/1/2021	David Marks	Finalize revisions to Schroyer declaration for opposition to motion to strike Schroyer declaration 2.40	\$950.00	2.4	\$2,280.00								
	10/1/2021	David Marks	Teleconferences with Attorney Healey regarding Schroyer declaration and opposition to MTS .30	\$950.00	0.3	\$285.00								
	10/1/2021	David Marks	Teleconference with Attorney Thornton and Schroyer regarding edits to declaration .30	\$950.00	0.3	\$285.00								
	10/1/2021	David Marks	GoToMeeting with Attorney Thornton to discuss Schroyer declaration and opposition to MTS 4.80	\$950.00	4.8	\$4,560.00								
	10/1/2021	David Marks	Additional GoToMeeting with Attorney Thornton regarding revisions to opposition to MTS based on Schroyer declaration 1.80	\$950.00	1.8	\$1,710.00								
	10/1/2021	David Marks	Receipt, review and respond to numerous emails from Attorneys Healey and Umpierre regarding Schroyer declaration and MTS .60	\$950.00	0.6	\$570.00								
	10/1/2021	Jim Thornton	Calls and GoToMeetings with David Marks regarding Dale Schroyer declaration and opposition to MS Dale Schroyer Reply Dec 4.8	\$500.00	4.8	\$2,400.00								
	10/1/2021	Jim Thornton	Work on Opposition to MTS 3.0	\$500.00	3	\$1,500.00								
	10/1/2021	Jim Thornton	Second GoToMeeting with Dale Schroyer and David Marks regarding package files 1.8	\$500.00	1.8	\$900.00								
	10/1/2021	Jim Thornton	Work on checking references to Dale Schroyer dec in Opposition and sent edits to California team 1.3	\$500.00	1.3	\$650.00								
	10/1/2021	Jim Thornton	Received and reviewed numerous emails related to these projects .8	\$500.00	0.8	\$400.00								
	10/3/2021	Jim Thornton	Email from Chris Healey regarding task times requested .2	\$500.00	0.2	\$100.00								
	10/3/2021	Jim Thornton	Work on pulling times requested and preparing responsive email .9	\$500.00	0.9	\$450.00								
	10/3/2021	Jim Thornton	Email task time info to David Marks .1	\$500.00	0.1	\$50.00								
	10/4/2021	David Marks	Teleconference with Attorney Thornton regarding Attorney Healey's request to Soojin as to waiver of protective order re: Aegis task times .20	\$950.00	0.2	\$190.00								
	10/4/2021	David Marks	GoToMeeting with Attorney Thornton regarding production of Appendices 3-5, Aegis Task Times 1.0	\$950.00	1	\$950.00								
	10/4/2021	David Marks	Research and email to Attorney Healey regarding source of task times and Dale Schroyer references to 95 task times from "Other AL Chain" .90	\$950.00	0.9	\$855.00								
	10/4/2021	David Marks	Respond to email from Attorney C. Healey re: Dale's reply Declaration reference to "other ALF chain task time" and global expert inputs re: same. .40	\$950.00	0.4	\$380.00								
	10/4/2021	Jim Thornton	Call from Chris Healey regarding task times .1	\$500.00	0.1	\$50.00								
	10/4/2021	Jim Thornton	GoToMeeting w/ David Marks regarding task time questions from Chris Healey and emails regarding same 1.0	\$500.00	1	\$500.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
10/4/2021	Jim Thornton	Telephone call with David Marks regarding request regarding Aegis task time use .2	\$500.00	0.2	\$100.00								
10/5/2021	David Marks	Organize file in preparation for Dale Schroyer and Dr. Cristina Flores depositions .70	\$950.00	0.7	\$665.00								
10/5/2021	Jim Thornton	Emails from team regarding filed opp to MTS Schroyer .2	\$500.00	0.2	\$100.00								
10/6/2021	David Marks	GoToMeeting with Attorney Thornton, Dale Schroyer, Kurt Shampine improper contact by Resolution Economics with ProModel tech support 1.10	\$950.00	1.1	\$1,045.00								
10/6/2021	David Marks	GoToMeeting with Attorney Thornton regarding 1 emails to California team and 2 improper contact by Resolution Economics 1.60	\$950.00	1.6	\$1,520.00								
10/6/2021	David Marks	GoToMeeting with Attorney Thornton and Dale Schroyer regarding his corrections to questions posed to tech support 0.70	\$950.00	0.7	\$665.00								
10/6/2021	David Marks	Teleconference with Attorneys M. Johnson, G. Wallace, and J. Thornton regarding improper contact by Resolution Economics with MedModel .30	\$950.00	0.3	\$285.00								
10/6/2021	Jim Thornton	Calls with Mark Johnson, GW, David Marks regarding improper contact with MedModel .3	\$500.00	0.3	\$150.00								
10/6/2021	Jim Thornton	Teams meeting the David Marks, KS, Dale Schroyer regarding call to tech support by Resolution Economics 1.1	\$500.00	1.1	\$550.00								
10/6/2021	Jim Thornton	GoToMeetings and work with David Marks regarding emails to California team regarding contact by Resolution Economics 1.6	\$500.00	1.6	\$800.00								
10/6/2021	Jim Thornton	GoToMeeting w/Dale Schroyer and David Marks regarding his corrections to questions posed to tech support .7	\$500.00	0.7	\$350.00								
10/7/2021	David Marks	Teleconference with CA Team regarding Austin's "Looks Good" .50	\$950.00	0.5	\$475.00			0.5	475				
10/7/2021	David Marks	GoToMeeting with Attorney Thornton to work on draft email point by point response regarding Resolution Economic's improper contact of MedModel 3.5	\$950.00	3.5	\$3,325.00								
10/7/2021	David Marks	Teleconference with Attorney C. Healey regarding Resolution Economics' response .20	\$950.00	0.2	\$190.00								
10/7/2021	Jim Thornton	Conference call with California team regarding contact of MedModel by opposing experts 1.0	\$500.00	1	\$500.00			1	500				
10/7/2021	Jim Thornton	Calls and GoToMeetings with David Marks and partially w/ Dale Schroyer regarding Resolution Economics contact 3.5	\$500.00	3.5	\$1,750.00								
10/8/2021	David Marks	Teleconferences with Attorney Thornton regarding draft response to Resol. Econ. improper contact of MedModel .40	\$950.00	0.4	\$380.00								
10/8/2021	David Marks	Additional GoToMeeting with Attorney Thornton regarding draft response to Resol. Econ. Improper contact of MedModel .50	\$950.00	0.5	\$475.00								
10/8/2021	David Marks	Teleconference with Attorney Thornton regarding Bruce Gladwin review of Resol. Econ. email .10	\$950.00	0.1	\$95.00								
10/8/2021	David Marks	Compose email to Attorney Healey transmitting final draft response to Resol. Econ. contact of MedModel .10	\$950.00	0.1	\$95.00								
10/8/2021	David Marks	Teleconference with Attorney Healey regarding protected .PKG files and ProModel letter to Resol. Econ. .20	\$950.00	0.2	\$190.00								
10/8/2021	David Marks	Compose emails to CA Team regarding status of Bruce Gladwin (ProModel) letter to Resol. Econ. .20	\$950.00	0.2	\$190.00								
10/8/2021	David Marks	Review case expenses .20	\$950.00	0.2	\$190.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs	Fees	Falkenberg	Fees	Travel	Fees
				Worked			General							
							Hrs	Fees	Hrs		Hrs		Hrs	
10/8/2021	David Marks	Receipt and review Attorney Healey email and exhibits regarding status of Aegis protective order and our arguments that it was not violated [.30]	\$950.00	0.3		\$285.00								
10/8/2021	Jim Thornton	Call with Bruce Gladwin [.1]	\$500.00	0.1		\$50.00								
10/8/2021	Jim Thornton	Call with Dale Schroyer [.1]	\$500.00	0.1		\$50.00								
10/8/2021	Jim Thornton	And multiple calls with David Marks [.5]	\$500.00	0.5		\$250.00								
10/8/2021	Jim Thornton	All regarding ProModel response to Resolution Economics, GoToMeeting with David Marks regarding same [.5]	\$500.00	0.5		\$250.00								
10/11/2021	David Marks	Receipt and review Attorney Healey memo regarding ex parte contact with adverse expert violated Rule 26 [.70]	\$950.00	0.7		\$665.00								
10/11/2021	David Marks	Research Campbell Industries case in Attorney Healey's memo [.10]	\$950.00	0.1		\$95.00								
10/11/2021	David Marks	Compose email to CA Team regarding Campbell Industries (based on then text of Rule 26) [.10]	\$950.00	0.1		\$95.00								
10/11/2021	David Marks	Review again Attorney Healey's memo and evidence produced by Aegis (non-confidential) and Dual Deck, 9th Circuit case [.60]	\$950.00	0.6		\$570.00								
10/13/2021	David Marks	Compose email to Attorney Healey regarding Kennedy sampling project [.10]	\$950.00	0.1		\$95.00								
10/13/2021	David Marks	Teleconference with Attorney Healey regarding Kennedy sampling and call today at 3 p.m. [.10]	\$950.00	0.1		\$95.00								
10/13/2021	David Marks	Prep for teleconference with Kennedy regarding sampling [.20]	\$950.00	0.2		\$190.00								
10/13/2021	David Marks	Teleconference with Attorney Thornton regarding Kennedy sampling [.50]	\$950.00	0.5		\$475.00								
10/13/2021	David Marks	Teleconference with Attorney Healey regarding sampling procedure/work to be done [.70]	\$950.00	0.7		\$665.00								
10/13/2021	Jim Thornton	Received and reviewed memo regarding computer sim admissibility from David Marks/Chris Healey [.2]	\$500.00	0.2		\$100.00								
10/13/2021	Jim Thornton	Work with David Marks regarding sampling protocol [1.2]	\$500.00	1.2		\$600.00								
10/13/2021	Jim Thornton	Work on sampling breakdown spreadsheets [.5]	\$500.00	0.5		\$250.00								
10/13/2021	Jim Thornton	Conference call with team regarding sampling [.9]	\$500.00	0.9		\$450.00			0.9	450				
10/13/2021	Jim Thornton	Sent sortable version of sampling spreadsheet to team [.3]	\$500.00	0.3		\$150.00								
10/14/2021	Jim Thornton	Received and reviewed updated case schedule [.2]	\$500.00	0.2		\$100.00								
10/15/2021	David Marks	Receipt and review emails from Attorneys Umpierre and Healey regarding Soojin questions about Aegis task times being in public domain [.10]	\$950.00	0.1		\$95.00								
10/15/2021	David Marks	Teleconference with Attorney Thornton to discuss To Do list [.20]	\$950.00	0.2		\$190.00								
10/15/2021	David Marks	Teleconference with Attorney Thornton to compose a draft email to Soojin regarding task times/protective order [.20]	\$950.00	0.2		\$190.00								
10/15/2021	David Marks	Revise proposed letter/email to Soojin, and forward same to Attorney Umpierre and Attorney Healey [.70]	\$950.00	0.7		\$665.00								
10/15/2021	David Marks	Edit language to be added to Soojin email regarding Aegis protective order issue [.20]	\$950.00	0.2		\$190.00								
10/15/2021	Jim Thornton	Received and reviewed email regarding Aegis protective order issue from Chris Healey [.3]	\$500.00	0.3		\$150.00								
10/15/2021	Jim Thornton	Prep for and call with Brian Umpierre regarding Aegis Exhibit 45 [.4]	\$500.00	0.4		\$200.00								
10/15/2021	Jim Thornton	Work on draft email confirming use of Exhibit 45 [.6]	\$500.00	0.6		\$300.00								
10/15/2021	Jim Thornton	Email to David Marks regarding proposed draft, call and contents of Exhibit 45 [.5]	\$500.00	0.5		\$250.00								
10/15/2021	Jim Thornton	Emails from team regarding Exhibit 45 [.4]	\$500.00	0.4		\$200.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
<u>Fees</u>													
10/15/2021	Jim Thornton	Call with David Marks regarding To Do list .2	\$500.00	0.2	\$100.00								
10/15/2021	Jim Thornton	Call with David Marks regarding draft email to Soojin regarding task times/protective order .2	\$500.00	0.2	\$100.00								
10/18/2021	David Marks	Receipt and review Crandall declaration from Sunrise, and prepare notes .20	\$950.00	0.2	\$190.00								
10/18/2021	Jim Thornton	Multiple emails with Brian Umpierre regarding permutations analysis and draft language of meet and confer letter .9	\$500.00	0.9	\$450.00								
10/19/2021	David Marks	Receipt and review multiple emails from Attorneys Umpierre and Healey regarding Aegis protective order, including steps with Aegis to address .30	\$950.00	0.3	\$285.00								
10/19/2021	David Marks	Receipt and review email from Attorney Healey with attached motions to strike expert declarations .10	\$950.00	0.1	\$95.00								
10/19/2021	David Marks	Continue work on reply to motions to strike expert declarations 1.50	\$950.00	1.5	\$1,425.00								
10/19/2021	Jim Thornton	Review of Flores depo and Schroyer reply dec regarding task times used .8	\$500.00	0.8	\$400.00								
10/19/2021	Jim Thornton	Email to Brian Umpierre regarding reply decs .3	\$500.00	0.3	\$150.00								
10/19/2021	Jim Thornton	Emails with Brian Umpierre regarding permutations analysis and draft language of meet and confer letter 1.3	\$500.00	1.3	\$650.00								
10/20/2021	Jim Thornton	Received and reviewed multiple emails regarding Aegis protective order issues related to task times .7	\$500.00	0.7	\$350.00								
10/20/2021	Jim Thornton	Work with David Marks regarding email to Guy Wallace about protective order 1.0	\$500.00	1	\$500.00								
10/20/2021	Jim Thornton	Received and reviewed notice of conference call with California team .2	\$500.00	0.2	\$100.00								
10/21/2021	Jim Thornton	Received and reviewed emails regarding sampling protocol .2	\$500.00	0.2	\$100.00								
10/21/2021	Jim Thornton	Received and reviewed emails regarding Aegis protective order .3	\$500.00	0.3	\$150.00								
10/22/2021	Jim Thornton	Emails related to Sunrise floorplans .3	\$500.00	0.3	\$150.00								
10/22/2021	Jim Thornton	Downloaded floorplans .2	\$500.00	0.2	\$100.00								
10/22/2021	Jim Thornton	Prep for call with Kennedy's team regarding sampling protocol .4	\$500.00	0.4	\$200.00								
10/22/2021	Jim Thornton	Call with Lindsay Petite regarding sampling protocol .6	\$500.00	0.6	\$300.00								
10/22/2021	Jim Thornton	Review of emails from Kennedy's office regarding sampling protocol .5	\$500.00	0.5	\$250.00								
10/25/2021	David Marks	Continue review and highlight of key arguments made by Sunrise in its Reply Brief for striking Dale Schroyer's Reply Declaration .60	\$950.00	0.6	\$570.00								
10/25/2021	David Marks	Review and identify drill down points in Defendants' reply in opposition to Schroyer reply declaration 1.20	\$950.00	1.2	\$1,140.00								
10/25/2021	David Marks	Compose email to Attorney Healey regarding key drilldown points for Schroyer reply declaration and our response to Defendants' reply supporting strike of Schroyer reply declaration .20	\$950.00	0.2	\$190.00								
10/25/2021	David Marks	Teleconference with Attorney Thornton to discuss Schroyer and Flores responses to Defendants' Reply ISO Striking these experts' declarations .60	\$950.00	0.6	\$570.00								
10/25/2021	Jim Thornton	Review of Sunrise Reply in Support of MTS Schroyer .8	\$500.00	0.8	\$400.00								
10/25/2021	Jim Thornton	Received and reviewed questions from Chris Healey regarding hearing prep .3	\$500.00	0.3	\$150.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
10/25/2021	Jim Thornton	Review documents related to history of questions being posed .8	\$500.00	0.8	\$400.00								
10/25/2021	Jim Thornton	Call with David Marks regarding Schroyer and Flores responses to Defendants' reply ISO striking these experts' declarations .6	\$500.00	0.6	\$300.00								
10/26/2021	David Marks	Teleconferences with Attorney Thornton regarding To Do list for Schroyer and Flores MTS arguments and prep for Wednesday call .30	\$950.00	0.3	\$285.00								
10/26/2021	David Marks	Prep for MTS arguments Wednesday call and hearing .70	\$950.00	0.7	\$665.00								
10/26/2021	David Marks	GoToMeeting with Attorney Thornton regarding response to Defendants' reply/brief supporting MTS Flores declaration and Schroyer reply declaration 3.60	\$950.00	3.6	\$3,420.00								
10/26/2021	David Marks	Compose email to Attorney Umpierre requesting agreement regarding production of declaration supporting documents .10	\$950.00	0.1	\$95.00								
10/26/2021	David Marks	Receipt and review of same .50	\$950.00	0.5	\$475.00								
10/26/2021	David Marks	Compose email to Attorney Umpierre regarding proof by Sunrise to support reply ISO MTS Flores (p. 12) .20	\$950.00	0.2	\$190.00								
10/26/2021	David Marks	GoToMeeting with Attorney Thornton regarding response to Sunrise reply ISO MTS Schroyer reply declaration and Flores declaration 1.30	\$950.00	1.3	\$1,235.00								
10/26/2021	David Marks	Continue to prep and work on response to Sunrise's reply ISO MTS Schroyer and Flores 1.70	\$950.00	1.7	\$1,615.00								
10/26/2021	David Marks	Compose email to CA Team transmitting arguments to opposition to Sunrise's reply .60	\$950.00	0.6	\$570.00								
10/26/2021	David Marks	Receipt and review multiple emails from Attorneys Healey, Wallace, and Umpierre regarding Sunrise reply - integrate into draft response .20	\$950.00	0.2	\$190.00								
10/26/2021	David Marks	Teleconference with Attorney Umpierre regarding Sunrise reply .30	\$950.00	0.3	\$285.00								
10/26/2021	Jim Thornton	Work on answers to Chris Healey question related to upcoming hearings 1.3	\$500.00	1.3	\$650.00								
10/26/2021	Jim Thornton	Prepare query for Blake Peters regarding assessment data and presence of any Executive Director or management being assigned care tasks .3	\$500.00	0.3	\$150.00								
10/26/2021	Jim Thornton	GoToMeeting w/David Marks and Brian Umpierre regarding hearing prep 1.3	\$500.00	1.3	\$650.00								
10/26/2021	Jim Thornton	GoToMeetings with David Marks regarding hearing prep 3.6	\$500.00	3.6	\$1,800.00								
10/27/2021	David Marks	Prepare To Do list for MTS hearing, including multiple issues 3.20	\$950.00	3.2	\$3,040.00								
10/27/2021	David Marks	Teleconference with Attorney Thornton regarding prep for today's meeting and Friday's MTS hearing, including discussion regarding Defendants' claim only 32 assessments are missing .30	\$950.00	0.3	\$285.00								
10/27/2021	David Marks	GoToMeeting with Attorney Thornton regarding response to Attorney Healey question regarding missing assessment data 1.20	\$950.00	1.2	\$1,140.00								
10/27/2021	David Marks	Correspondence to CA team providing detail responses to possible questions in the upcoming MTS hearing .60	\$950.00	0.6	\$570.00								
10/27/2021	Jim Thornton	GoToMeeting with David Marks 1.2	\$500.00	1.2	\$600.00								
10/27/2021	Jim Thornton	Call with David Marks .3	\$500.00	0.3	\$150.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
10/27/2021	Jim Thornton	Email to Blake Peters regarding Edna's Place during sample timeframe [.3]	\$500.00	0.3	\$150.00								
10/27/2021	Jim Thornton	Attempted to convert .pdf assessment to excel file to illustrate issues with same and prepared explanation of issues related to same [1.5]	\$500.00	1.5	\$750.00								
10/27/2021	Jim Thornton	Conference call with California team regarding hearing prep [1.0]	\$500.00	1	\$500.00			1	500				
10/27/2021	Jim Thornton	Received and reviewed questions from Chris Healey regarding hearing prep [.3]	\$500.00	0.3	\$150.00								
10/27/2021	Jim Thornton	Calls with Mike Perry and Blake Peters regarding conversion of .pdf to excel [.8]	\$500.00	0.8	\$400.00								
10/27/2021	Jim Thornton	Emails with Blake Peters regarding Sunrise audit of missing assessments [.3]	\$500.00	0.3	\$150.00								
10/27/2021	Jim Thornton	Work on email related to deep dive analysis of Sunrise's production of assessment data [1.2]	\$500.00	1.2	\$600.00								
10/28/2021	David Marks	Receipt and review email from Attorney Umpierre transmitting draft letter to Sunrise in connection with the production of the Aegis task times in Sunrise [.30]	\$950.00	0.3	\$285.00								
10/28/2021	David Marks	Receipt and review email from Attorney Umpierre regarding his conversation with Attorney Soojin and her understanding that we must have same treatment in Brookdale-CA [.10]	\$950.00	0.1	\$95.00								
10/28/2021	David Marks	Receipt and review email from Attorney Wallace regarding same [.10]	\$950.00	0.1	\$95.00								
10/28/2021	David Marks	Receipt, review, and respond to Attorney Healey's questions regarding Crandall second declaration regarding protected files [2.30]	\$950.00	2.3	\$2,185.00								
10/28/2021	David Marks	Receipt, review and edit draft answers to Attorney Healey's questions from Attorney Thornton [.30]	\$950.00	0.3	\$285.00								
10/28/2021	David Marks	Compose email to Attorney Thornton of my edited response to Attorney Healey's questions and set up conference call regarding same [.10]	\$950.00	0.1	\$95.00								
10/28/2021	David Marks	3 teleconferences with Attorney Thornton to discuss answers to possible questions in upcoming MTS hearing [.40]	\$950.00	0.4	\$380.00								
10/28/2021	David Marks	Receipt and review Attorney Umpierre's email with draft email to Sunrise regarding below [.20]	\$950.00	0.2	\$190.00								
10/28/2021	David Marks	GoToMeeting with Attorney Thornton regarding response to Attorney Healey regarding questions on missing assessment data, preparation for hearing and Aegis protective order issue [3.70]	\$950.00	3.7	\$3,515.00								
10/28/2021	David Marks	Edit Attorney Umpierre's draft email to Sunrise regarding Aegis protective order [.40]	\$950.00	0.4	\$380.00								
10/28/2021	David Marks	Receipt and review email from Attorney Wallace regarding my edits to draft email [.10]	\$950.00	0.1	\$95.00								
10/28/2021	David Marks	Receipt and review email from Attorney Umpierre regarding everyone's edits/suggestions for draft email to Sunrise [.10]	\$950.00	0.1	\$95.00								
10/28/2021	David Marks	Compose email to CA Team regarding additional edit to draft email to Sunrise [.10]	\$950.00	0.1	\$95.00								
10/28/2021	David Marks	Review Crandall depo - refusal to answer questions and Gorman objections on basis of protective order [.20]	\$950.00	0.2	\$190.00								
10/28/2021	David Marks	Continue to prep for conference call regarding Friday's hearing [1.30]	\$950.00	1.3	\$1,235.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
10/28/2021	David Marks	Receipt and review Attorneys Johnson and Wallace's request for update regarding 1) new Brookdale data produced, and 2) status of expected vs. actual hours analysis, and review recent emails with new data .30	\$950.00	0.3	\$285.00								
10/28/2021	David Marks	Teleconference with Attorney Umpierre regarding letter to Defendants regarding Aegis' task times being in public domain, and discuss Flores and Crandall parts of letter .10	\$950.00	0.1	\$95.00								
10/28/2021	David Marks	Compose email to Attorney Umpierre transmitting Crandall depo transcript regarding refusal to answer question and Gorman's objection regarding ALF task times .10	\$950.00	0.1	\$95.00								
10/28/2021	David Marks	Continue to edit Gorman/Crandall sentence based on depo of Crandall, and forward same to CA Team .40	\$950.00	0.4	\$380.00								
10/28/2021	David Marks	GoToMeeting and telephone call with Attorney Thornton regarding answers to Attorney Healey's questions about protected .PKG files 2.50	\$950.00	2.5	\$2,375.00								
10/28/2021	David Marks	Receipt and review email continuing Friday, 10.29.21 hearing on MTS Schroyer/Flores to Friday, 11.05.21 .10	\$950.00	0.1	\$95.00								
10/28/2021	David Marks	Receipt and review file supplemental production by Plaintiff regarding Aegis protective order being non-applicable to task times .10	\$950.00	0.1	\$95.00								
10/28/2021	Jim Thornton	Work on proposed responses to numerous questions from Chris Healey regarding hearing 2.2	\$500.00	2.2	\$1,100.00								
10/28/2021	Jim Thornton	GoToMeetings with David Marks regarding Sunrise hearing prep and Aegis protective order issue 3.7	\$500.00	3.7	\$1,850.00								
10/28/2021	Jim Thornton	Multiple calls with David Marks regarding hearing prep .5	\$500.00	0.5	\$250.00								
10/28/2021	Jim Thornton	Call with Dale Schroyer regarding hearing prep .4	\$500.00	0.4	\$200.00								
10/28/2021	Jim Thornton	Emails and call with Blake Peters regarding Edna's Place questions .3	\$500.00	0.3	\$150.00								
10/28/2021	Jim Thornton	Received and reviewed analysis of service code counts at Sunrise from Blake Peters .3	\$500.00	0.3	\$150.00								
10/28/2021	Jim Thornton	Email to Bruce Gladwin regarding availability for reviewing and signing a declaration .3	\$500.00	0.3	\$150.00								
10/28/2021	Jim Thornton	Work on emails regarding small tweak to Brian Umpierre's response about Crandall testimony .4	\$500.00	0.4	\$200.00								
10/28/2021	Jim Thornton	Received and reviewed notice of MTS continued .3	\$500.00	0.3	\$150.00								
10/28/2021	Jim Thornton	GoToMeeting and call with David Marks regarding answers to Chris Healey's questions about protected simulation .pkg files 2.5	\$500.00	2.5	\$1,250.00								
10/29/2021	David Marks	GoToMeeting with Attorney Thornton to finalize memo to CA Team regarding arguments in response to defense MTS claims 1.80	\$950.00	1.8	\$1,710.00								
10/29/2021	David Marks	Compose email to CA Team transmitting memo regarding arguments in opposition to defense MTS claims .40	\$950.00	0.4	\$380.00								
10/29/2021	David Marks	Receipt and review Attorney Healey's objections to Crandall declaration and notice of errata for Dale Schroyer .20	\$950.00	0.2	\$190.00								
10/29/2021	David Marks	GoToMeeting with Attorney Thornton regarding MTS arguments and preparation for 11.05.21 Hearing 4.10	\$950.00	4.1	\$3,895.00								
10/29/2021	Jim Thornton	Multiple GoToMeetings with David Marks regarding various response to MTS Schroyer and Flores in prep for hearing 4.1	\$500.00	4.1	\$2,050.00								
10/29/2021	Jim Thornton	Emails with Bruce Gladwin regarding declaration .3	\$500.00	0.3	\$150.00								
10/29/2021	Jim Thornton	Calls and texts with Dale Schroyer regarding prep .2	\$500.00	0.2	\$100.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
10/29/2021	Jim Thornton	Pulled and sent prior analysis of ex parte contact to David Marks .2	\$500.00	0.2	\$100.00								
10/31/2021	Jim Thornton	Received and reviewed additional questions from Chris Healey regarding hearing .4	\$500.00	0.4	\$200.00								
11/1/2021	David Marks	Teleconference with Attorney Thornton regarding Crandall's argument on the La Jolla 148-hour black box argument .20	\$950.00	0.2	\$190.00								
11/1/2021	David Marks	GoToMeeting with Attorney Thornton regarding Crandall arguments, and related MTS Schroyer/Flores issues 6.60	\$950.00	6.6	\$6,270.00	6.6	\$6,270.00						
11/1/2021	David Marks	Review/develop possible reasons to address Crandall 148-hour black box argument and compose email to Attorney Thornton regarding same 0.8	\$950.00	0.8	\$760.00								
11/1/2021	David Marks	Finalize Bruce Gladwin declaration, and forward same to CA Team .60	\$950.00	0.6	\$570.00								
11/1/2021	David Marks	Receipt, review and respond to Attorney Healey's objections to Crandall's declaration based on Bruce Gladwin declaration .50	\$950.00	0.5	\$475.00								
11/1/2021	David Marks	Receipt and review email from Attorney Healey regarding pulling down the errata and Bruce Gladwin declaration .10	\$950.00	0.1	\$95.00								
11/1/2021	David Marks	Teleconference with Attorney Healey regarding same .10	\$950.00	0.1	\$95.00								
11/1/2021	Jim Thornton	Calls with Bruce Gladwin regarding his declaration .2	\$500.00	0.2	\$100.00								
11/1/2021	Jim Thornton	Work on finalizing Gladwin dec .5	\$500.00	0.5	\$250.00								
11/1/2021	Jim Thornton	Sent draft for final review to Bruce Gladwin .2	\$500.00	0.2	\$100.00								
11/1/2021	Jim Thornton	Lengthy GoToMeetings with David Marks regarding La Jolla sim results and including time with Dale Schroyer prepping for hearing 6.6	\$500.00	6.6	\$3,300.00	6.6	\$3,300.00						
11/1/2021	Jim Thornton	W/on explanation of base services and sent to David Marks .3	\$500.00	0.3	\$150.00								
11/1/2021	Jim Thornton	Calls with David Marks regarding Crandall arguments .2	\$500.00	0.2	\$100.00								
11/1/2021	Jim Thornton	Received and reviewed numerous emails regarding Crandall and filing errata .2	\$500.00	0.2	\$100.00								
11/2/2021	David Marks	Teleconference with Attorney Thornton regarding graphs and zeroing out analysis .40	\$950.00	0.4	\$380.00								
11/2/2021	David Marks	GoToMeetings with Attorney Thornton regarding responding to Crandall attack of Schroyer/Flores 1.20	\$950.00	1.2	\$1,140.00								
11/2/2021	David Marks	GoToMeeting with Dale Schroyer and Attorney Thornton regarding Crandall's excess hours argument 1.00	\$950.00	1	\$950.00								
11/2/2021	Jim Thornton	Call from David Marks regarding graphs and zeroing out analysis .4	\$500.00	0.4	\$200.00								
11/2/2021	Jim Thornton	GoToMeetings with David Marks regarding responding to Crandall attack 1.2	\$500.00	1.2	\$600.00								
11/2/2021	Jim Thornton	GoToMeeting with Dale Schroyer and David Marks regarding excess hours argument 1.0	\$500.00	1	\$500.00								
11/3/2021	David Marks	Teleconference with Attorney Thornton regarding MTS hearing prep .60	\$950.00	0.6	\$570.00								
11/3/2021	David Marks	Draft explanation to 148-hour argument for Friday hearing regarding MTS Schroyer, and email to CA Team 1.20	\$950.00	1.2	\$1,140.00								
11/3/2021	David Marks	Compose email to CA Team transmitting graph of Sunrise's PowerPoint, SUN0112099, "Our Care Managers' Reality" .10	\$950.00	0.1	\$95.00								
11/3/2021	David Marks	Teleconference to Dr. Rich Feldman regarding same .40	\$950.00	0.4	\$380.00								
11/3/2021	David Marks	GoToMeeting with Attorney Thornton regarding 148-hour black box argument 3.00	\$950.00	3	\$2,850.00								
11/3/2021	David Marks	Email errata language to CA Team in preparation for Friday's hearing on MTS Schroyer .20	\$950.00	0.2	\$190.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
11/3/2021	David Marks	Respond to Attorney Healey's email tweaking our earlier errata response .10	\$950.00	0.1		\$95.00								
11/3/2021	David Marks	Teleconference with S. Meachen regarding authoritative literature request of 2 person assist indicator of omitted care .10	\$950.00	0.1		\$95.00								
11/3/2021	David Marks	Receipt and review of same .10	\$950.00	0.1		\$95.00								
11/3/2021	David Marks	In preparation of 148-hour argument at Friday's hearing, conduct research and send to CA Team Sunrise's produced documents showing support for peak times and Plaintiffs' argument .40	\$950.00	0.4		\$380.00								
11/3/2021	David Marks	Organize and file relevant emails and responses by subject in Sunrise subfolder .70	\$950.00	0.7		\$665.00								
11/3/2021	David Marks	GoToMeeting with Attorney Thornton regarding hearing prep .90	\$950.00	0.9		\$855.00								
11/3/2021	Jim Thornton	Calls with David Marks regarding hearing prep .6	\$500.00	0.6		\$300.00								
11/3/2021	Jim Thornton	Emails with Rich Feldman regarding QA of model .4	\$500.00	0.4		\$200.00								
11/3/2021	Jim Thornton	Work on QA of model 2.2	\$500.00	2.2		\$1,100.00								
11/3/2021	Jim Thornton	Calls with Blake Peters .2	\$500.00	0.2		\$100.00								
11/3/2021	Jim Thornton	GoToMeeting w/Rich Feldman and David Marks responding to Crandall attack and MTS Schroyer 3.0	\$500.00	3		\$1,500.00								
11/3/2021	Jim Thornton	GoToMeeting w/ David Marks regarding hearing prep .9	\$500.00	0.9		\$450.00								
11/4/2021	David Marks	Teleconferences with Attorney Thornton regarding Crandall argument regarding 148-hour argument .40	\$950.00	0.4		\$380.00								
11/4/2021	David Marks	Compose email to CA Team regarding explanation of Crandall's 148-hour argument 1.00	\$950.00	1		\$950.00								
11/4/2021	David Marks	Receipt and review email from Attorney Thornton regarding Attorney Healey's questions on motions to strike expert declarations - Crandall 2nd declaration .70	\$950.00	0.7		\$665.00								
11/4/2021	David Marks	Teleconferences with Attorney Thornton regarding Dr. Rich Feldman's findings .20	\$950.00	0.2		\$190.00								
11/4/2021	David Marks	GoToMeeting with Attorney Thornton and Dale Schroyer regarding Crandall flawed MTS arguments and analysis of results for 2-person assist 4.40	\$950.00	4.4		\$4,180.00								
11/4/2021	Jim Thornton	Calls with David Marks regarding MTS Schroyer .4	\$500.00	0.4		\$200.00								
11/4/2021	Jim Thornton	GoToMeetings w/Dale Schroyer, David Marks regarding hearing prep 4.4	\$500.00	4.4		\$2,200.00								
11/4/2021	Jim Thornton	Received and reviewed emails regarding questions related to MTS Schroyer from Chris Healey .3	\$500.00	0.3		\$150.00								
11/4/2021	Jim Thornton	Received and reviewed related emails and emails concerning filing of errata .2	\$500.00	0.2		\$100.00								
11/4/2021	Jim Thornton	Work on responses to various hearing related questions 1.2	\$500.00	1.2		\$600.00								
11/4/2021	Jim Thornton	Call with David Marks regarding Dr. Rich Feldman's findings .2	\$500.00	0.2		\$100.00								
11/5/2021	David Marks	Teleconference with Dale Schroyer regarding Attorney Healey's question regarding staffing activity log .10	\$950.00	0.1		\$95.00								
11/5/2021	David Marks	Respond to Attorney Healey's 2 questions regarding 2-person assist and per shift outputs .70	\$950.00	0.7		\$665.00								
11/5/2021	David Marks	GoToMeeting with Attorney Thornton regarding response to Crandall attack .80	\$950.00	0.8		\$760.00								
11/5/2021	David Marks	Teleconference with Attorney Thornton regarding hearing preparation items .70	\$950.00	0.7		\$665.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
11/5/2021	David Marks	GoToMeeting with Attorney Thornton, Mike Perry and Guy Wallace regarding same .20	\$950.00	0.2	\$190.00								
11/5/2021	David Marks	Attend virtual hearing by Zoom .80	\$950.00	0.8	\$760.00								
11/5/2021	Jim Thornton	Prepared draft answers to Chris Healey's questions related to MTS Schroyer and sent to David Marks .7	\$500.00	0.7	\$350.00								
11/5/2021	Jim Thornton	GoToMeeting with David Marks regarding response to Crandall attack .8	\$500.00	0.8	\$400.00								
11/5/2021	Jim Thornton	Call with Rich Feldman regarding prep for hearing .2	\$500.00	0.2	\$100.00								
11/5/2021	Jim Thornton	GoToMeeting w/Rich Feldman regarding prep for hearing 1.5	\$500.00	1.5	\$750.00								
11/5/2021	Jim Thornton	GoToMeeting w/Mike Perry, GW, David Marks re: database questions related to hearing .2	\$500.00	0.2	\$100.00								
11/5/2021	Jim Thornton	Call with David Marks regarding hearing prep items .7	\$500.00	0.7	\$350.00								
11/5/2021	Jim Thornton	Calls with Dale Schroyer .3	\$500.00	0.3	\$150.00								
11/5/2021	Jim Thornton	Emails with Brian Umpierre regarding opposition to MTS Schroyer .2	\$500.00	0.2	\$100.00								
11/9/2021	Jim Thornton	Received and reviewed email from Rich Feldman regarding QA and analysis 2.4	\$500.00	2.4	\$1,200.00								
11/10/2021	David Marks	Receipt and review email from Attorney Umpierre .10	\$950.00	0.1	\$95.00								
11/10/2021	David Marks	Telephone call with Attorney Umpierre regarding Aegis Flores deposition (task times) .10	\$950.00	0.1	\$95.00								
11/10/2021	David Marks	Teleconference with Attorney Thornton regarding to do list .10	\$950.00	0.1	\$95.00								
11/10/2021	David Marks	GoToMeeting with Attorney Thornton regarding Flores depo subpoena response, including review of task time spreadsheets, Flores opposition to MTS, reply declaration, and reason for conservative task times 3.20	\$950.00	3.2	\$3,040.00								
11/10/2021	David Marks	Draft objections to Flores subpoena .60	\$950.00	0.6	\$570.00								
11/10/2021	David Marks	Draft emails to Attorney Johnson regarding date B. Peters provided SAS to Defendants .20	\$950.00	0.2	\$190.00								
11/10/2021	David Marks	Receipt and review Erica Rutner request for production by B. Peters data .10	\$950.00	0.1	\$95.00								
11/10/2021	David Marks	Telephone call with Attorney Thornton regarding same .10	\$950.00	0.1	\$95.00								
11/10/2021	David Marks	Teleconference and email to Diane Asher regarding date B. Peters' hard drive was sent to Defendants .20	\$950.00	0.2	\$190.00								
11/10/2021	David Marks	Receipt and review of emails from CA Team regarding call to discuss high/low settlement agreement .10	\$950.00	0.1	\$95.00								
11/10/2021	David Marks	Respond to conference request .10	\$950.00	0.1	\$95.00								
11/10/2021	David Marks	Receipt and review email from Attorney Umpierre regarding Flores declaration in Aegis - not redacted only some exhibits were .20	\$950.00	0.2	\$190.00								
11/10/2021	David Marks	Receipt and review email from Attorney Johnson regarding 2-person assist .10	\$950.00	0.1	\$95.00								
11/10/2021	David Marks	Settlement conference call with Attorneys Stebner, Wallace, Healey and Umpierre, including review of Attorney Healey regarding damage exposure and related issues 1.0	\$950.00	1	\$950.00								
11/10/2021	Diane Asher	Confer with Attorney Marks re: hard drive sent to Defendants	\$85.00	0.2	\$17.00								
11/10/2021	Jim Thornton	GoToMeeting with David Marks regarding Flores depo subpoena response 3.2	\$500.00	3.2	\$1,600.00								
11/10/2021	Jim Thornton	Call with David Marks regarding Erica Rutner request for production by Peters data .1	\$500.00	0.1	\$50.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
11/11/2021	Jim Thornton	Received and reviewed multiple emails regarding lodestar requests .2	\$500.00	0.2	\$100.00								
11/12/2021	Jim Thornton	Call and emails with Diane Asher regarding Lodestar requests .2	\$500.00	0.2	\$100.00								
11/12/2021	Jim Thornton	Emails related to protective order .3	\$500.00	0.3	\$150.00								
11/16/2021	David Marks	Receipt and review order denying MTS Schroyer and Flores, and granting class certification .60	\$950.00	0.6	\$570.00								
11/16/2021	David Marks	Teleconference to Attorney Thornton and Attorney Umpierre regarding court's order .20	\$950.00	0.2	\$190.00								
11/16/2021	David Marks	Receipt and review emails from CA Team regarding ruling and possible appeal by Defendant .30	\$950.00	0.3	\$285.00								
11/16/2021	Jim Thornton	Received and reviewed order granting motion for class cert and denying motions to strike Flores and Schroyer and emails from team regarding same .5	\$500.00	0.5	\$250.00								
11/16/2021	Jim Thornton	Call with David Marks and Brian Umpierre regarding court's order .2	\$500.00	0.2	\$100.00								
11/18/2021	David Marks	Teleconference with Attorney Healey regarding To Do list post-certification (pre-trial) and deadlines .70	\$950.00	0.7	\$665.00								
11/19/2021	David Marks	Meeting with Diane Asher regarding time records for Sunrise .20	\$950.00	0.2	\$190.00								
11/19/2021	David Marks	Teleconference with Attorney Thornton regarding same and To Do list post-certification .20	\$950.00	0.2	\$190.00								
11/19/2021	Diane Asher	Meet with Attorney Marks re: Sunrise time records	\$85.00	0.2	\$17.00								
11/19/2021	Jim Thornton	Call from David Marks regarding sample protocol and status .2	\$500.00	0.2	\$100.00								
11/19/2021	Jim Thornton	Call and GoToMeeting w/BO regarding excel handling .4	\$500.00	0.4	\$200.00								
11/19/2021	Jim Thornton	Call and GoToMeeting w/Diane Asher regarding prep for settlement discussions .4	\$500.00	0.4	\$200.00								
11/19/2021	Jim Thornton	Received and reviewed and sent order on Motion for Class Cert to both Dr. Flores and Dale Schroyer .4	\$500.00	0.4	\$200.00								
11/19/2021	Jim Thornton	Received and reviewed email from Chris Healey regarding jury instructions and trial proof outline .3	\$500.00	0.3	\$150.00								
11/20/2021	Jim Thornton	Received and reviewed emails regarding trial strategy meeting .2	\$500.00	0.2	\$100.00								
11/21/2021	Jim Thornton	Received and reviewed emails regarding trial strategy meeting .2	\$500.00	0.2	\$100.00								
11/22/2021	David Marks	Confirm schedule for trial prep meeting on 1.10.22-1.11.22 .10	\$950.00	0.1	\$95.00								
12/1/2021	David Marks	Receipt and review emails from Attorney Healey regarding CLM review notes and database 0.40	\$950.00	0.4	\$380.00								
12/1/2021	Jim Thornton	Emails with Chris Healey regarding CLM review notes and database .4	\$500.00	0.4	\$200.00								
12/2/2021	David Marks	Receipt and review emails from CA Team regarding trial prep planning .30	\$950.00	0.3	\$285.00								
12/2/2021	Jim Thornton	Emails from trial team regarding prep session in January .3	\$500.00	0.3	\$150.00								
12/8/2021	Jacques Balette	Review deposition of Dale Schroyer 3.0	\$750.00	3	\$2,250.00								
12/8/2021	Jacques Balette	Confer with Attorney Marks about upcoming assignments .3	\$750.00	0.3	\$225.00								
12/15/2021	David Marks	Receipt and review email from Attorney Thornton regarding setting up call .20	\$950.00	0.2	\$190.00								
12/15/2021	David Marks	Teleconference with Attorney Thornton requesting land mine analysis .20	\$950.00	0.2	\$190.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/15/2021	David Marks	Receipt and review email from Attorney Thornton regarding land mine analyses [.70]	\$950.00	0.7		\$665.00								
12/15/2021	David Marks	Receipt and review email from Attorney Healey regarding Kennedy sampling issues [.30]	\$950.00	0.3		\$285.00								
12/15/2021	Jim Thornton	Email to Ed Jones, David Marks and Blake Peters regarding setting up call [.2]	\$500.00	0.2		\$100.00								
12/15/2021	Jim Thornton	Call from David Marks requesting land mine analyses [.2]	\$500.00	0.2		\$100.00								
12/15/2021	Jim Thornton	Worked on pulling land mine analyses from other cases and sent to David Marks [.7]	\$500.00	0.7		\$350.00								
12/15/2021	Jim Thornton	Email from Chris Healey regarding Kennedy sampling issues [.3]	\$500.00	0.3		\$150.00								
12/16/2021	David Marks	GoToMeeting with Attorney Thornton prior to CA Team trial prep meeting [3.00]	\$950.00	3		\$2,850.00								
12/16/2021	David Marks	Receipt and review email from Attorney Thornton containing trial prep notes [1.10]	\$950.00	1.1		\$1,045.00								
12/16/2021	Jim Thornton	GoToMeeting with David Marks in advance of California trial team prep session [3.0]	\$500.00	3		\$1,500.00								
12/16/2021	Jim Thornton	Trial team prep session via GoToMeeting [2.0]	\$500.00	2		\$1,000.00			2	1000				
12/16/2021	Jim Thornton	Email and call to Blake Peters regarding question of and determining if any incomplete assessments were produced [.5]	\$500.00	0.5		\$250.00								
12/16/2021	Jim Thornton	Work on trial prep notes and sent to David Marks [1.1]	\$500.00	1.1		\$550.00								
12/16/2021	Jim Thornton	Email to Brian Umpierre requesting happy camper decs [.2]	\$500.00	0.2		\$100.00								
12/17/2021	David Marks	GoToMeeting with Attorney Thornton and CA Team regarding trial preparation, discuss to dos including witness investigation [1.00]	\$950.00	1		\$950.00			1	950				
12/17/2021	Jim Thornton	Work on Happy Camper cross-examination template [2.9]	\$500.00	2.9		\$1,450.00								
12/17/2021	Jim Thornton	GoToMeeting w/Blake Peters regarding analysis [1.2]	\$500.00	1.2		\$600.00								
12/17/2021	Jim Thornton	Call to Ed Jones regarding availability [.2]	\$500.00	0.2		\$100.00								
12/17/2021	Jim Thornton	Trial prep session via GoToMeeting w/trial team [1.0]	\$500.00	1		\$500.00			1	500				
12/17/2021	Jim Thornton	Review of happy camper declarations [.9]	\$500.00	0.9		\$450.00								
12/19/2021	David Marks	Receipt, review, and edit email from Attorney Thornton containing Motion to Compel Discovery [1.20]	\$950.00	1.2		\$1,140.00								
12/19/2021	Jim Thornton	Received and reviewed MTC and worked on edits to same [2.3]	\$500.00	2.3		\$1,150.00								
12/19/2021	Jim Thornton	Sent to David Marks [.1]	\$500.00	0.1		\$50.00								
12/20/2021	David Marks	GoToMeeting with Attorney Thornton revising Motion to Compel [1.70]	\$950.00	1.7		\$1,615.00								
12/20/2021	David Marks	Receipt and review email from Attorney Thornton containing latest round of revisions to Motion to Compel [.50]	\$950.00	0.5		\$475.00								
12/20/2021	Jim Thornton	GoToMeeting w/David Marks regarding MTC [1.7]	\$500.00	1.7		\$850.00								
12/20/2021	Jim Thornton	Sent draft to David Marks [.1]	\$500.00	0.1		\$50.00								
12/20/2021	Jim Thornton	Called Ed Jones regarding status and left message [.2]	\$500.00	0.2		\$100.00								
12/22/2021	David Marks	Receipt and review email from Attorney Thornton regarding his conference with Dr. Richard Feldman concerning interpolation questions based on current simulation in outputs and facility characteristics [1.00]	\$950.00	1		\$950.00								
12/22/2021	Jim Thornton	GoToMeeting w/Rich Feldman regarding interpolation questions [.6]	\$500.00	0.6		\$300.00								
12/22/2021	Jim Thornton	Email to David Marks regarding interpolation questions [.3]	\$500.00	0.3		\$150.00								
12/22/2021	Jim Thornton	Email to Blake Peters regarding requested data in Sunrise [.5]	\$500.00	0.5		\$250.00								
12/22/2021	Jim Thornton	Call with Blake Peters regarding requested data [.3]	\$500.00	0.3		\$150.00								
1/3/2022	David Marks	Receipt and review email from Attorney Thornton regarding interpolation and explanation [1.00]	\$950.00	1		\$950.00								

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
							<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/3/2022	David Marks	Teleconference with Attorney Healey regarding rescheduling the next trial prep meeting [.10]	\$950.00	0.1	\$95.00								
	1/3/2022	Jim Thornton	Email to David Marks regarding interpolation and explanation [.4]	\$500.00	0.4	\$200.00								
	1/4/2022	David Marks	GoToMeeting with Attorney Thornton regarding data for Dr. Rich Feldman analyses with B. Peters joining meeting [2.60]	\$950.00	2.6	\$2,470.00								
	1/4/2022	David Marks	Work with Attorney Thornton regarding email to Attorney Healey concerning census issues and Motion to Compel [.30]	\$950.00	0.3	\$285.00								
	1/4/2022	David Marks	Review Dr. Richard Feldman extrapolation/interpolation project regarding 52 Sunrise facilities, including review spreadsheet of data produced/calculated, review of evidence produced by Sunrise, and review of Sunrise emails from Attorney Umpierre regarding missing data [.90]	\$950.00	0.9	\$855.00								
	1/4/2022	David Marks	Teleconference with Attorney Thornton regarding Dr. Feldman project [.20]	\$950.00	0.2	\$190.00								
	1/4/2022	David Marks	GoToMeeting with Attorney Thornton and B. Peters regarding Dr. Feldman extrapolation/interpolation project [2.40]	\$950.00	2.4	\$2,280.00								
	1/4/2022	David Marks	Receipt and review email from CA Team confirming Zoom meeting for trial prep [.10]	\$950.00	0.1	\$95.00								
	1/4/2022	David Marks	Work on trial prep materials derived from my review of Attorney Healey materials [.9]	\$950.00	0.9	\$855.00								
	1/4/2022	David Marks	Telephone call with CA Team, including jury instructions [.2]	\$950.00	0.2	\$190.00			0.2	190				
	1/4/2022	David Marks	Update filing of documents and emails by subject matter topic [1.30]	\$950.00	1.3	\$1,235.00								
	1/4/2022	Jim Thornton	Work on including the simulation results in the data for Feldman [.7]	\$500.00	0.7	\$350.00								
	1/4/2022	Jim Thornton	Began work on email explaining data to Feldman [.5]	\$500.00	0.5	\$250.00								
	1/4/2022	Jim Thornton	GoToMeeting work session with David Marks regarding data for Feldman analyses with B. Peters joining meeting [2.6]	\$500.00	2.6	\$1,300.00								
	1/4/2022	Jim Thornton	Work with David Marks regarding email to Chris Healey concerning census issues and MTC [.3]	\$500.00	0.3	\$150.00								
	1/4/2022	Jim Thornton	Cancelled rental car reservation for meeting in TX [.2]	\$500.00	0.2	\$100.00								
	1/4/2022	Jim Thornton	Call with David Marks regarding Dr. Feldman project [.2]	\$500.00	0.2	\$100.00								
	1/4/2022	Jim Thornton	GoToMeeting with David Marks and Blake Peters regarding Dr. Feldman extrapolation/interpolation project [2.4]	\$500.00	2.4	\$1,200.00								
	1/5/2022	David Marks	Teleconference with Attorney Thornton regarding Dr. Edward Jones/status of QA Sunrise (and review of B. Peters declaration and data map) [.10]	\$950.00	0.1	\$95.00								
	1/5/2022	David Marks	Teleconference with Attorney Thornton regarding status of Dr. Richard Feldman data [.20]	\$950.00	0.2	\$190.00								
	1/5/2022	David Marks	Teleconference with Attorney Thornton regarding cost of remaining simulations [.10]	\$950.00	0.1	\$95.00								
	1/5/2022	Jim Thornton	Multiple emails and calls w/Blake Peters regarding additional data for Feldman analyses [.8]	\$500.00	0.8	\$400.00								
	1/5/2022	Jim Thornton	GoToMeeting w/Rich Feldman regarding data [.3]	\$500.00	0.3	\$150.00								
	1/5/2022	Jim Thornton	Calls with David Marks regarding analyses, status of Feldman analysis, remaining sims, and availability of data [.7]	\$500.00	0.7	\$350.00								
	1/5/2022	Jim Thornton	Email to Ed Jones regarding status [.2]	\$500.00	0.2	\$100.00								
	1/6/2022	David Marks	Prepare for teleconference with Dr. Richard Feldman regarding confidential extrapolation and interpolation [0.80]	\$950.00	0.8	\$760.00								

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				Worked		General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/6/2022	David Marks	GoToMeeting with Attorney Thornton and Dr. Richard Feldman regarding confidential interpolation and extrapolation in Sunrise 1.10	\$950.00	1.1	\$1,045.00								
1/6/2022	David Marks	Review preliminary order from Magistrate Guilford regarding discovery motion to compel .80	\$950.00	0.8	\$760.00								
1/6/2022	Jim Thornton	GoToMeeting w/Rich Feldman and David Marks regarding interpolation and data availability 1.1	\$500.00	1.1	\$550.00								
1/6/2022	Jim Thornton	Email with Ed Jones regarding schedule .3	\$500.00	0.3	\$150.00								
1/6/2022	Jim Thornton	GoToMeeting w/ Blake Peters regarding QA status .5	\$500.00	0.5	\$250.00								
1/7/2022	David Marks	Receipt and review emails from Attorney Thornton regarding Dr. Edward Jones meetings .10	\$950.00	0.1	\$95.00								
1/7/2022	David Marks	Receipt and review email from Attorney Thornton regarding Dr. Jones payment for time .20	\$950.00	0.2	\$190.00								
1/7/2022	David Marks	Teleconferences with Attorney Thornton regarding: calendar of trial prep - 1.12.22 and to dos .20	\$950.00	0.2	\$190.00								
1/7/2022	David Marks	Review prior ProModel cost projections invoices and requested update on cost for additional work .20	\$950.00	0.2	\$190.00								
1/7/2022	David Marks	Teleconference with Attorney Thornton regarding costs of DES to respond to Attorney Healey's email request for same schedule and schedule call with Dale Schroyer .30	\$950.00	0.3	\$285.00								
1/7/2022	David Marks	GoToMeeting call with Schroyer and Attorney Thornton regarding same .80	\$950.00	0.8	\$760.00								
1/7/2022	David Marks	Compose email to Attorney Healey attaching projection with explanation .30	\$950.00	0.3	\$285.00								
1/7/2022	David Marks	Teleconference with Attorney Thornton regarding edits to cost projection .10	\$950.00	0.1	\$95.00								
1/7/2022	David Marks	Teleconference with Attorney Healey regarding discovery hearing and prep for Tuesday trial meeting .80	\$950.00	0.8	\$760.00								
1/7/2022	David Marks	File projected simulation cost for 36 facilities .10	\$950.00	0.1	\$95.00								
1/7/2022	David Marks	Review ProModel cost projection (not including cost for B. Peters, Dr. Jones, Dr. Feldman or other support personnel .10	\$950.00	0.1	\$95.00								
1/7/2022	David Marks	Teleconference with Attorney Thornton regarding same .10	\$950.00	0.1	\$95.00								
1/7/2022	David Marks	Review Attorney Healey summary of today's discovery hearing before Judge Guilford .10	\$950.00	0.1	\$95.00								
1/7/2022	Jim Thornton	Call from David Marks regarding projected costs for additional analyses .1	\$500.00	0.1	\$50.00								
1/7/2022	Jim Thornton	Work on simulation cost estimates .3	\$500.00	0.3	\$150.00								
1/7/2022	Jim Thornton	Emails with Dale Schroyer and David Marks setting up a call to discuss .2	\$500.00	0.2	\$100.00								
1/7/2022	Jim Thornton	GoToMeeting with Dale Schroyer and David Marks regarding cost projections .8	\$500.00	0.8	\$400.00								
1/7/2022	Jim Thornton	Call with Blake Peters regarding status of Ed Jones project .1	\$500.00	0.1	\$50.00								
1/7/2022	Jim Thornton	Call with Ed Jones regarding QA review .3	\$500.00	0.3	\$150.00								
1/8/2022	David Marks	Review Attorney Umpierre memo of discovery hearing on Friday before Judge Guilford .30	\$950.00	0.3	\$285.00								
1/8/2022	David Marks	Receipt and review of Dr. Rich Feldman's regression analysis and scatter plots regarding omitted care relating to delta between actual hours and target hours (to discuss with Attorney Thornton and Dr. Feldman) .60	\$950.00	0.6	\$570.00								
1/10/2022	Jim Thornton	Call w/Blake Peters regarding QA analysis and additional data for Ed Jones' review .2	\$500.00	0.2	\$100.00								

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							<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	1/10/2022	Jim Thornton	Email to Ed Jones regarding link to data for review .2	\$500.00	0.2	\$100.00								
	1/10/2022	Jim Thornton	Texts and GoToMeeting with Rich Feldman regarding regression analysis .7	\$500.00	0.7	\$350.00								
	1/10/2022	Jim Thornton	Calls and GoToMeeting with Blake Peters regarding San Raphael staffing question .3	\$500.00	0.3	\$150.00								
	1/10/2022	Jim Thornton	Email to Rich Feldman with updated San Raphael data due to Sunrise's doubling of certain job codes on certain days .3	\$500.00	0.3	\$150.00								
	1/10/2022	Jim Thornton	Email to Dale Schroyer regarding Nobee deposition, requesting input for prep .2	\$500.00	0.2	\$100.00								
	1/11/2022	Jim Thornton	Received and reviewed and responded to email from Chris Healey regarding tomorrow's meeting schedule .1	\$500.00	0.1	\$50.00								
	1/11/2022	Jim Thornton	Emails with Ed Jones regarding meeting on Wednesday .1	\$500.00	0.1	\$50.00								
	1/12/2022	David Marks	Prepare for teleconference with Dr. Edward Jones regarding QA of voluminous data summaries compiled by B. Peters .60	\$950.00	0.6	\$570.00								
	1/12/2022	David Marks	2 teleconferences with Attorney Thornton regarding same .20	\$950.00	0.2	\$190.00								
	1/12/2022	David Marks	Teleconference with Dr. Jones regarding Excel spreadsheets .30	\$950.00	0.3	\$285.00								
	1/12/2022	David Marks	Receipt and review email and Order regarding Judge Stanton's unsealing of class certification and Motion to Strike ruling .10	\$950.00	0.1	\$95.00								
	1/12/2022	David Marks	Receipt and review Dr. Feldman's linear regression model results .30	\$950.00	0.3	\$285.00								
	1/12/2022	David Marks	Prepare for Dr. Feldman call with Attorney Thornton 1.00	\$950.00	1	\$950.00								
	1/12/2022	David Marks	Teleconference with Attorney Thornton and Dr. Feldman regarding linear regression formula 2.00	\$950.00	2	\$1,900.00								
	1/12/2022	David Marks	Prepare for 3:00 p.m. trial prep call with CA Team, including review of Attorney Healey's jury instructions and Dr. Feldman's findings 1.20	\$950.00	1.2	\$1,140.00								
	1/12/2022	David Marks	Teleconference with Attorney Thornton regarding key evidence in advance of trial prep call (see "Cracked the Code" email of 1.12.22) .20	\$950.00	0.2	\$190.00								
	1/12/2022	David Marks	Trial prep teleconference with CA Team, including Attorneys Healey, Thamer, Umpierre, Wallace and Thornton 1.60	\$950.00	1.6	\$1,520.00			1.6	1520				
	1/12/2022	David Marks	Receipt and review email from Attorney Healey regarding trial exhibit lists .30	\$950.00	0.3	\$285.00								
	1/12/2022	David Marks	Receipt and review detailed email from Attorney Umpierre regarding discovery and meet/confer with Defendants 0.40	\$950.00	0.4	\$380.00								
	1/12/2022	Jim Thornton	GoToMeeting w/ Rich Feldman and David Marks regarding regressions 2.0	\$500.00	2	\$1,000.00								
	1/12/2022	Jim Thornton	GoToMeeting with Brian Umpierre, Chris Healey, David Marks, and GB regarding trial prep session 2.0	\$500.00	2	\$1,000.00								
	1/12/2022	Jim Thornton	Sent cracking the code outline to David Marks .1	\$500.00	0.1	\$50.00								
	1/12/2022	Jim Thornton	Call with David Marks regarding various to do .4	\$500.00	0.4	\$200.00								
	1/12/2022	Jim Thornton	Call with Ed Jones and David Marks regarding upcoming deadlines and analysis .2	\$500.00	0.2	\$100.00								
	1/12/2022	Jim Thornton	Texts with Ed Jones and Blake Peters regarding meetings .1	\$500.00	0.1	\$50.00								
	1/13/2022	David Marks	Meeting with Investigator Harry Fleming regarding family and former employee fact witnesses 2.70	\$950.00	2.7	\$2,565.00								
	1/13/2022	David Marks	Review Attorney Healey's exposure analysis received 1.12.22 .20	\$950.00	0.2	\$190.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/13/2022	David Marks	Teleconference with Diane Asher regarding setting up a trial prep notebook [.30]	\$950.00	0.3	\$285.00								
1/13/2022	Diane Asher	Meeting with Attorney Marks re: notebook preparation	\$85.00	0.3	\$25.50								
1/13/2022	Jim Thornton	Began work on draft declaration/report for Richard Feldman [3.9]	\$500.00	3.9	\$1,950.00								
1/13/2022	Jim Thornton	Email from and to Brian Umpierre regarding Yardi assessments [.5]	\$500.00	0.5	\$250.00								
1/14/2022	David Marks	Receipt and review email from Attorney Thornton regarding pre-2016 assessment data [.20]	\$950.00	0.2	\$190.00								
1/14/2022	Jim Thornton	Review of background info from Brian Umpierre regarding Yardi assessment issue [.6]	\$500.00	0.6	\$300.00								
1/14/2022	Jim Thornton	Work on email response regarding Yardi [.7]	\$500.00	0.7	\$350.00								
1/14/2022	Jim Thornton	Call to Blake Peters re assessment question being raised [.2]	\$500.00	0.2	\$100.00								
1/14/2022	Jim Thornton	Received and reviewed Dr. Cristina Flores response regarding Yardi assessment data [.3]	\$500.00	0.3	\$150.00								
1/17/2022	David Marks	Set up trial prep notes [.30]	\$950.00	0.3	\$285.00								
1/17/2022	David Marks	Review update witness leads from Harry Fleming derived from social media, and review 84 family complaints about Sunrise care [.80]	\$950.00	0.8	\$760.00								
1/17/2022	Jim Thornton	Texts with Rich Feldman regarding discussing regression and update to same [.2]	\$500.00	0.2	\$100.00								
1/18/2022	David Marks	Teleconference with Harry Fleming regarding status of fact witness locations [.20]	\$950.00	0.2	\$190.00								
1/18/2022	David Marks	Continue review of social media potential family witness and file in subfolder [.70]	\$950.00	0.7	\$665.00								
1/18/2022	David Marks	Compose email to Attorney Healey regarding damage projections [.20]	\$950.00	0.2	\$190.00								
1/18/2022	David Marks	Review "Happy Camper" list and access to declaration [.30]	\$950.00	0.3	\$285.00								
1/18/2022	David Marks	Review length of residency summary and discuss with B. Peters [.30]	\$950.00	0.3	\$285.00								
1/18/2022	David Marks	Teleconference with Attorney Thornton regarding above [.20]	\$950.00	0.2	\$190.00								
1/18/2022	David Marks	File emails/communications by subject [.40]	\$950.00	0.4	\$380.00								
1/18/2022	Jim Thornton	Texts and GoToMeeting w/Rich Feldman regarding regression analysis by floor [.8]	\$500.00	0.8	\$400.00								
1/18/2022	Jim Thornton	Brief call with David Marks regarding regression [.2]	\$500.00	0.2	\$100.00								
1/18/2022	Jim Thornton	Call with Blake Peters regarding San Mateo data [.3]	\$500.00	0.3	\$150.00								
1/18/2022	Jim Thornton	Created list of Happy Campers with declarations in Excel for social media analysis [.4]	\$500.00	0.4	\$200.00								
1/18/2022	Jim Thornton	Sent list to David Marks [.1]	\$500.00	0.1	\$50.00								
1/19/2022	David Marks	Receipt, review, and file Attorney Healey email regarding amount and source of move-in fees and service fees [.20]	\$950.00	0.2	\$190.00								
1/19/2022	David Marks	Teleconference with B. Peters regarding damage projections based on length of stays and per diem damage amount [.30]	\$950.00	0.3	\$285.00								
1/19/2022	David Marks	Review B. Peters length of stay analysis and minimum omitted care percentage [.70]	\$950.00	0.7	\$665.00								
1/19/2022	David Marks	Compose email to Attorney Thornton forwarding same for discussion and to obtain update [.20]	\$950.00	0.2	\$190.00								
1/19/2022	David Marks	Receipt and review email from Attorney Thornton regarding regression analysis [.10]	\$950.00	0.1	\$95.00								
1/19/2022	David Marks	Status teleconference with Attorney Thornton regarding same [.20]	\$950.00	0.2	\$190.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/19/2022	Jim Thornton	Review of Blake Peters analysis of census matches [.3]	\$500.00	0.3		\$150.00								
1/19/2022	Jim Thornton	Email to Blake Peters regarding census and handling of San Raphael [.3]	\$500.00	0.3		\$150.00								
1/19/2022	Jim Thornton	Calls to and from Blake Peters regarding San Raphael and assessments, length of stay questions for damage projections [.4]	\$500.00	0.4		\$200.00								
1/19/2022	Jim Thornton	Review of damage projections [.3]	\$500.00	0.3		\$150.00								
1/19/2022	Jim Thornton	Emails with David Marks regarding Feldman analysis applied to projections [.3]	\$500.00	0.3		\$150.00								
1/19/2022	Jim Thornton	Brief call with David Marks regarding Feldman analysis [.2]	\$500.00	0.2		\$100.00								
1/20/2022	Jim Thornton	Email to Dr. Cristina Flores regarding reassessment requirements and time [.2]	\$500.00	0.2		\$100.00								
1/20/2022	Jim Thornton	Emails with Blake Peters regarding reassessments [.1]	\$500.00	0.1		\$50.00								
1/21/2022	David Marks	Receipt and review Attorney Gorman's proposed revised Scheduling Order [.20]	\$950.00	0.2		\$190.00								
1/21/2022	David Marks	Receipt and review Attorney Healey email regarding Slichta and Winkler departure from Sunrise [.10]	\$950.00	0.1		\$95.00								
1/21/2022	David Marks	Receipt and review email from Attorney Gorman regarding discovery production [.30]	\$950.00	0.3		\$285.00								
1/21/2022	Jim Thornton	Multiple calls with Blake Peters regarding San Raphael and 6 month assessment concept and related analyses [.3]	\$500.00	0.3		\$150.00								
1/21/2022	Jim Thornton	Review of census analysis with 6 month concept applied [.3]	\$500.00	0.3		\$150.00								
1/21/2022	Jim Thornton	Emails with Blake Peters regarding reassessments every 6 months [.3]	\$500.00	0.3		\$150.00								
1/21/2022	Jim Thornton	Detailed email to David Marks regarding additional analyses and proposed course of action [.7]	\$500.00	0.7		\$350.00								
1/21/2022	Jim Thornton	Email to David Marks regarding Wald concept [.3]	\$500.00	0.3		\$150.00								
1/21/2022	Jim Thornton	Received and reviewed email from David Marks regarding application for fees [.1]	\$500.00	0.1		\$50.00								
1/24/2022	David Marks	Receipt and review email from Dr. Richard Feldman attaching his updated regression report [.80]	\$950.00	0.8		\$760.00								
1/24/2022	David Marks	Compose email to Dr. Ed Jones requesting update on status [.10]	\$950.00	0.1		\$95.00								
1/24/2022	David Marks	Receipt and review Attorney Healey's proposed response to Attorney Gorman's scheduling proposal [.10]	\$950.00	0.1		\$95.00								
1/24/2022	David Marks	Receipt and review email from Attorney Brian Umpierre regarding SJ date [.10]	\$950.00	0.1		\$95.00								
1/24/2022	David Marks	Receipt and review multiple emails regarding scheduling order changes [.30]	\$950.00	0.3		\$285.00								
1/24/2022	David Marks	Teleconference with Attorney Healey regarding [1] amount of time required to analyze data for 36 Sunrise facilities (by B. Peters) and for ProModel to run simulation, [2] regression analysis, and [3] how much data needed to cover 100% of data for interpolation [.40]	\$950.00	0.4		\$380.00								
1/24/2022	Jim Thornton	Received and reviewed briefly report from Rich Feldman regarding regression [.3]	\$500.00	0.3		\$150.00								
1/24/2022	Jim Thornton	Email to Ed Jones regarding CV and status [.1]	\$500.00	0.1		\$50.00								
1/25/2022	David Marks	Receipt and review multiple emails regarding scheduling issue and class listing, and review Attorney Wallace proposed change regarding Daubert move to Dec. 2, 2022 [.30]	\$950.00	0.3		\$285.00								
1/25/2022	David Marks	Receipt and review updated proposed scheduling order [.30]	\$950.00	0.3		\$285.00								

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						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/25/2022	David Marks	Receipt and review email from Attorney Gorman complaining about Attorney Umpierre's unreasonable schedule regarding MSJ .30	\$950.00	0.3	\$285.00								
1/26/2022	David Marks	GoToMeeting with Attorney Thornton regarding application of regression analysis by Dr. Richard Feldman to damage projections .80	\$950.00	0.8	\$760.00								
1/26/2022	Jim Thornton	GoToMeeting w/David Marks regarding Feldman's regression analysis and possible use for damages .8	\$500.00	0.8	\$400.00								
1/26/2022	Jim Thornton	Received and reviewed multiple emails regarding case schedule .3	\$500.00	0.3	\$150.00								
1/27/2022	David Marks	Teleconference with Attorney Thornton regarding Dr. Richard Feldman analysis .50	\$950.00	0.5	\$475.00								
1/27/2022	David Marks	Perform trial prep tasks (a) follow up on depo summaries, service fees, witnesses status, (b) update Sunrise mediation slides, (c) build trial prep notebook by fact issue, (d) list of documents needed for exemplary case, (e) review damage exposure 1.50	\$950.00	1.5	\$1,425.00								
1/27/2022	David Marks	Multiple teleconferences with B. Peters regarding LOS analysis for class members per facility 1.30	\$950.00	1.3	\$1,235.00								
1/27/2022	David Marks	Receipt, review and edit email from B. Peters the LOS analysis and projected damages .70	\$950.00	0.7	\$665.00								
1/27/2022	David Marks	Teleconference with Diane Asher regarding changes .10	\$950.00	0.1	\$95.00								
1/27/2022	David Marks	Receipt and review email from Attorney Thornton regarding daily staffing minimums and maximums daily by facility .70	\$950.00	0.7	\$665.00								
1/27/2022	David Marks	Teleconference with Attorney Thornton regarding same .20	\$950.00	0.2	\$190.00								
1/27/2022	Diane Asher	Confer with Attorney Marks re: changes to LOS analysis	\$85.00	0.1	\$8.50								
1/27/2022	Jim Thornton	Call with David Marks regarding regression study and possible use .5	\$500.00	0.5	\$250.00								
1/27/2022	Jim Thornton	Work on trial prep tasks .4	\$500.00	0.4	\$200.00								
1/27/2022	Jim Thornton	Prepared and sent email to David Marks regarding priority tasks for Dr. Feldman .4	\$500.00	0.4	\$200.00								
1/27/2022	Jim Thornton	Email best case results to Sterling Meachen .3	\$500.00	0.3	\$150.00								
1/27/2022	Jim Thornton	Emails and calls with Brian Umpierre regarding timing of expert reports and justification for extension .6	\$500.00	0.6	\$300.00								
1/27/2022	Jim Thornton	Work on damage projections .6	\$500.00	0.6	\$300.00								
1/27/2022	Jim Thornton	Prepare email regarding limitations of class and sent to team for assistance .4	\$500.00	0.4	\$200.00								
1/27/2022	Jim Thornton	Call with David Marks regarding min/max analysis .2	\$500.00	0.2	\$100.00								
1/28/2022	David Marks	GoToMeeting with Attorney Thornton regarding potential issue with Sunrise's spreadsheet reporting service fees for all facilities .30	\$950.00	0.3	\$285.00								
1/28/2022	David Marks	Review of same spreadsheet .40	\$950.00	0.4	\$380.00								
1/28/2022	David Marks	Review of Lindsay spreadsheets from Dr. Kennedy 0.40	\$950.00	0.4	\$380.00								
1/28/2022	David Marks	GoToMeeting with Attorney Thornton regarding same .30	\$950.00	0.3	\$285.00								
1/28/2022	David Marks	Teleconference with Attorney Thornton regarding updated billing in Sunrise .20	\$950.00	0.2	\$190.00								
1/28/2022	Jim Thornton	GoToMeeting with David Marks regarding service fees paid according to Sunrise .3	\$500.00	0.3	\$150.00								
1/28/2022	Jim Thornton	GoToMeeting with David Marks regarding Dr. Kennedy analysis .3	\$500.00	0.3	\$150.00								
1/28/2022	Jim Thornton	Call with David Marks regarding resident billing .4	\$500.00	0.4	\$200.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg	Travel
						General Hrs	Fees	Hrs	Fees	Hrs	Fees
1/28/2022	Jim Thornton	Emails with Lindsay Petite regarding Sunrise billing information .4	\$500.00	0.4	\$200.00						
1/31/2022	David Marks	Reconcile paid/unpaid ProModel, Flores and Dr. Feldman invoices .40	\$950.00	0.4	\$380.00						
1/31/2022	David Marks	Review damage projection data regarding 1.4M patient days and Attorney Healey exposure analysis 1.12.22) 1.50	\$950.00	1.5	\$1,425.00						
1/31/2022	David Marks	Compose email to CA Team regarding same .60	\$950.00	0.6	\$570.00						
1/31/2022	David Marks	Calculate total daily patient days for all facilities .40	\$950.00	0.4	\$380.00						
1/31/2022	David Marks	Review Lindsay Petite data .10	\$950.00	0.1	\$95.00						
1/31/2022	David Marks	GoToMeeting with Attorney Thornton regarding same 1.40	\$950.00	1.4	\$1,330.00						
1/31/2022	Jim Thornton	GoToMeeting with David Marks regarding service fee and Sunrise billing analysis 1.4	\$500.00	1.4	\$700.00						
1/31/2022	Jim Thornton	Work on explanation of class member days analysis and sent to David Marks .3	\$500.00	0.3	\$150.00						
2/3/2022	David Marks	Teleconference with Rodney Jew (CDS Strategy Consulting, Inc.) regarding litigation strategy for key elements for class .90	\$950.00	0.9	\$855.00						
2/3/2022	Jim Thornton	Email from Chris Healey regarding team call next Thursday .1	\$500.00	0.1	\$50.00						
2/5/2022	David Marks	Continue work on trial presentation notebook and witness outlines 1.40	\$950.00	1.4	\$1,330.00						
2/6/2022	David Marks	Plan To Dos for regression analysis and expert reports due in Sunrise .60	\$950.00	0.6	\$570.00						
2/7/2022	David Marks	Multiple teleconferences with Attorney Thornton to discuss plan of action regarding expert witness reports .60	\$950.00	0.6	\$570.00						
2/7/2022	David Marks	Receipt and review new case deadlines .40	\$950.00	0.4	\$380.00						
2/7/2022	David Marks	Review and prep for conference call on Thursday regarding QA project by Dr. Jones .10	\$950.00	0.1	\$95.00						
2/7/2022	David Marks	Teleconference with Attorney Thornton regarding Dr. Ed Jones status .30	\$950.00	0.3	\$285.00						
2/7/2022	Jim Thornton	Calls with David Marks regarding expert reports .6	\$500.00	0.6	\$300.00						
2/7/2022	Jim Thornton	Call with David Marks regarding Ed Jones and possible use of him as expert in Sunrise case .3	\$500.00	0.3	\$150.00						
2/7/2022	Jim Thornton	Review of proposed agenda for Thursday call from Chris Healey .2	\$500.00	0.2	\$100.00						
2/9/2022	David Marks	Receipt and review updated spreadsheet with invoices and balances for expert witnesses .30	\$950.00	0.3	\$285.00						
2/9/2022	David Marks	Teleconference with T. Wright regarding update of same .10	\$950.00	0.1	\$95.00						
2/9/2022	David Marks	Teleconference with Attorney Thornton regarding status of Dr. Ed Jones project .50	\$950.00	0.5	\$475.00						
2/9/2022	David Marks	Receipt, download, and review multiple files from Denton law firm .50	\$950.00	0.5	\$475.00						
2/9/2022	Jim Thornton	Received and reviewed updated case calendar .2	\$500.00	0.2	\$100.00						
2/9/2022	Jim Thornton	Received multiple links for documents from Tessa Ryan .3	\$500.00	0.3	\$150.00						
2/9/2022	Jim Thornton	Call with David Marks regarding Jones QA projects .5	\$500.00	0.5	\$250.00						
2/10/2022	David Marks	Teleconference with Rodney Jew (CDS Strategy Consulting, Inc.) regarding system failure 2.30	\$950.00	2.3	\$2,185.00						
2/10/2022	David Marks	Teleconference with Attorneys Healey, Stebner, Umpierre and Yarnell regarding a To Do list for the case .80	\$950.00	0.8	\$760.00						
2/10/2022	Jim Thornton	Call with team regarding various case tasks and scheduling 1.0	\$500.00	1	\$500.00			1	500		
2/11/2022	David Marks	Receipt and review from Tara Wright attaching revised spreadsheet on expert witness paid/unpaid invoices .20	\$950.00	0.2	\$190.00						

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						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
2/11/2022	David Marks	Receipt and review emails from Attorney Healey regarding To Do list for trial prep .20	\$950.00	0.2	\$190.00								
2/11/2022	Jim Thornton	Received and reviewed list of to do items from Chris Healey .1	\$500.00	0.1	\$50.00								
2/12/2022	David Marks	Compose email to Attorney Healey regarding unpaid expert witnesses invoices and request for reimbursement attaching revised spreadsheet .30	\$950.00	0.3	\$285.00								
2/12/2022	David Marks	Receipt and review email from Attorney Healey regarding updated To Do list for trial prep .20	\$950.00	0.2	\$190.00								
2/12/2022	David Marks	Compose additional email to Attorney Healey regarding status of Sunrise production and revised scheduling .10	\$950.00	0.1	\$95.00								
2/12/2022	Jim Thornton	Received and reviewed email from David Marks regarding request for additional assessment and staffing data .1	\$500.00	0.1	\$50.00								
2/14/2022	David Marks	Work on trial expert witness report To Do calendar (based on updated scheduling order) .90	\$950.00	0.9	\$855.00								
2/14/2022	David Marks	GoToMeeting with Attorney Thornton regarding trial prep To Do List and scheduling deadline calendar .40	\$950.00	0.4	\$380.00								
2/14/2022	Jim Thornton	GoToMeeting with David Marks regarding to do list and scheduling deadline calendar .4	\$500.00	0.4	\$200.00								
2/15/2022	Jim Thornton	GoToMeeting with Blake Peters regarding to do list .2	\$500.00	0.2	\$100.00								
2/18/2022	David Marks	Compose email to Attorney Healey regarding status of class Order .10	\$950.00	0.1	\$95.00								
2/19/2022	Jim Thornton	Emails with David Marks regarding deadline calendar .2	\$500.00	0.2	\$100.00								
2/22/2022	David Marks	Receipt and review email from Attorney Umpierre regarding Defendant's request for mod file in Sunrise .10	\$950.00	0.1	\$95.00								
2/22/2022	David Marks	Teleconference with Attorney Thornton regarding same .30	\$950.00	0.3	\$285.00								
2/22/2022	David Marks	Compose email to Attorneys Healey and Umpierre regarding same .10	\$950.00	0.1	\$95.00								
2/22/2022	Jim Thornton	Call with David Marks regarding defense request for mod files .3	\$500.00	0.3	\$150.00								
2/23/2022	David Marks	Telephone call with Attorney Thornton regarding Dale Schroyer production of updated file .10	\$950.00	0.1	\$95.00								
2/23/2022	David Marks	Compose email to Schroyer regarding need to produce unprotected file .10	\$950.00	0.1	\$95.00								
2/23/2022	David Marks	Compose email to CA Team regarding unprotected package file (how long to produce) .10	\$950.00	0.1	\$95.00								
2/23/2022	David Marks	Teleconference with Attorney Thornton regarding same .10	\$950.00	0.1	\$95.00								
2/23/2022	David Marks	Teleconference with Tara Wright regarding current ProModel invoice balance .20	\$950.00	0.2	\$190.00								
2/23/2022	David Marks	Compose email to ProModel regarding same .10	\$950.00	0.1	\$95.00								
2/23/2022	David Marks	Receipt, review, and respond to email from Attorney Healey regarding plan of action for production of unprotected file .20	\$950.00	0.2	\$190.00								
2/23/2022	David Marks	Teleconference with Harry Fleming regarding witness investigation .20	\$950.00	0.2	\$190.00								
2/23/2022	David Marks	Compose email to Dale Schroyer regarding projected cost of producing unprotected package files and review of Brookdale costs of same .20	\$950.00	0.2	\$190.00								
2/23/2022	Jim Thornton	Call with David Marks regarding creation of mod files for production and requesting Dale Schroyer to prep same .1	\$500.00	0.1	\$50.00								
2/23/2022	Jim Thornton	Emails with David Marks and Dale Schroyer and Chris Healey regarding timing of production and costs .3	\$500.00	0.3	\$150.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
2/24/2022	David Marks	Receipt and review email from Attorney Umpierre regarding proposed email concerning unprotected package files [.20]	\$950.00	0.2	\$190.00								
2/24/2022	David Marks	Receipt and review Attorney Healey's plan of action for production of unprotected package file [.10]	\$950.00	0.1	\$95.00								
2/24/2022	David Marks	Compose email to Dale Schroyer and Attorney Healey regarding cost of unprotected files [.20]	\$950.00	0.2	\$190.00								
2/24/2022	David Marks	Teleconference with Attorney Thornton regarding Schroyer start date for unprotected files [.10]	\$950.00	0.1	\$95.00								
2/24/2022	Jim Thornton	Received draft emails to defense regarding mod file from Brian Umpierre and Chris Healey [.2]	\$500.00	0.2	\$100.00								
2/24/2022	Jim Thornton	Call with David Marks regarding timing of mod files [.1]	\$500.00	0.1	\$50.00								
2/24/2022	Jim Thornton	Email from Dale Schroyer regarding costs [.1]	\$500.00	0.1	\$50.00								
2/28/2022	David Marks	Receipt and review emails and memo regarding class attorney client Relativity [.60]	\$950.00	0.6	\$570.00								
2/28/2022	David Marks	Teleconference with Attorney Thornton regarding update from Dale Schroyer regarding mod files [.10]	\$950.00	0.1	\$95.00								
2/28/2022	Jim Thornton	Received and reviewed update from Dale Schroyer regarding mod files [.1]	\$500.00	0.1	\$50.00								
2/28/2022	Jim Thornton	Call with David Marks regarding mod files [.1]	\$500.00	0.1	\$50.00								
2/28/2022	Jim Thornton	Review of .mod files from Dale Schroyer [1.9]	\$500.00	1.9	\$950.00								
3/1/2022	David Marks	Receipt and review email from Attorney Umpierre regarding meet and confer concerning discovery still not produced (pendant data) [.20]	\$950.00	0.2	\$190.00								
3/1/2022	David Marks	Receipt and review Attorney Umpierre's proposed letter to Defendants regarding production of unprotected files/conditions [.10]	\$950.00	0.1	\$95.00								
3/2/2022	David Marks	Receipt and review email from Attorney Healey regarding his edits to draft letter to Defendants concerning unprotected package file production/conditions [.10]	\$950.00	0.1	\$95.00								
3/2/2022	David Marks	Respond to Attorneys Healey and Umpierre proposed edits of same [.10]	\$950.00	0.1	\$95.00								
3/3/2022	David Marks	Initiate email, receive, and review multiple emails from Attorneys B. Umpierre and C. Healey re production of witness statements pursuant to any Sunrise discovery request (RPDs) [.20]	\$950.00	0.2	\$190.00								
3/3/2022	David Marks	Teleconferences with H. Fleming regarding former employee [.90]	\$950.00	0.9	\$855.00								
3/7/2022	David Marks	Receipt, review, and respond to email from Attorney Healey regarding his question about unprotected package file production [.30]	\$950.00	0.3	\$285.00								
3/7/2022	David Marks	Teleconference with Attorney Thornton regarding same [.10]	\$950.00	0.1	\$95.00								
3/7/2022	David Marks	Review Attorney B. Umpierre deadline list [2-18-22 email] and L.Valdez calendar [.10]	\$950.00	0.1	\$95.00								
3/7/2022	David Marks	Receive/review Attorney Healy email re Judge Staton change in courtroom to LA [.10]	\$950.00	0.1	\$95.00								
3/7/2022	David Marks	Receipt/review of Defendant email re production of all resident assessments pursuant to Judge Guilford's order [.10]	\$950.00	0.1	\$95.00								
3/7/2022	Jim Thornton	Call with David Marks regarding production of models [.1]	\$500.00	0.1	\$50.00								
3/8/2022	David Marks	Receive/review Attorneys B. Umpierre/C.Healey proposed email to defendants re mod file production [.10]	\$950.00	0.1	\$95.00								

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
							<u>General</u> Hrs	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
	3/10/2022	David Marks	Witnesses: Receive/review emails from Attorney M. Yarnall re 2 happy campers changing their minds .10	\$950.00	0.1	\$95.00								
	3/11/2022	David Marks	Determine that .Modfile will be ready to produce on April 5. Email to Attorney B. Umpierre re production date and issue of defendant manipulation of .modfile without notice to Dale. .20	\$950.00	0.2	\$190.00								
	3/14/2022	David Marks	Witnesses: R/R email from Attorney C.Healey re questions for happy campers who are now unhappy .10	\$950.00	0.1	\$95.00								
	3/21/2022	David Marks	R/R email from Attorney B. Umpierre and attached Discovery Order in Brookdale re .mod files and request that defendant notify Plaintiff of any changes to same in advance of Schroyer depo. .20	\$950.00	0.2	\$190.00								
	3/22/2022	David Marks	Teleconference with H. Fleming re interview with witness Merissa Delgado (former employee) and confirmation of March 29th 5pm interview. .30	\$950.00	0.3	\$285.00								
	3/23/2022	David Marks	R/R email from atty. Pearigen (Sunrise) re proposed compromise re depo of D. Schroyer and disclosure of any .modfile changes. .10	\$950.00	0.1	\$95.00								
	3/24/2022	David Marks	Email to Attorney C. Healey re acceptance of Sunrise compromise + R/R of Attorneys B. Umpierre /C.Healey emails re same .10	\$950.00	0.1	\$95.00								
	3/28/2022	David Marks	Witness: Prep for interview with M. Delgado former Resident Care Coordinator of Alta Loma 2.80	\$950.00	2.8	\$2,660.00								
	3/29/2022	David Marks	Witness: Prep for interview with M. Delgado former Resident Care Coordinator of Alta Loma 1.80	\$950.00	1.8	\$1,710.00								
	3/29/2022	David Marks	Email to CA Team re upcoming Delgado interview and request for specific Alta loma info and proposed questions .20	\$950.00	0.2	\$190.00								
	3/29/2022	David Marks	R/R emails from Attorney C. Healey re Delgago questions + Attorney B. Umpierre email + Attorney J. Thornton email re point click care and CLM 0.30	\$950.00	0.3	\$285.00								
	3/29/2022	David Marks	R/R data analysis from B. Peters for Alta Loma-service counts and percent of Alta residents requiring each service .20	\$950.00	0.2	\$190.00								
	3/29/2022	David Marks	Interview with M. Delgado 2.00	\$950.00	2	\$1,900.00								
	3/29/2022	David Marks	Teleconferences with H. Flemming regarding former employee witness interviews (investigator) .30	\$950.00	0.3	\$285.00								
	3/29/2022	David Marks	R/R this data from B. Peters/Attorney Thornton .40	\$950.00	0.4	\$380.00								
	3/29/2022	David Marks	Other wxs, Leads: Email to team about other witness leads 0.10	\$950.00	0.1	\$95.00								
	3/29/2022	David Marks	R/R email from Attorney B. Umpierre re personnel files and exemplar of resident assessment info 0.10	\$950.00	0.1	\$95.00								
	3/30/2022	David Marks	R/R exemplar of Sunrise Alta Loma assessment data (sent by Attorney B. Umpierre) - move-in/ move-out dates, diagnosis, continence level, service level, medication level, ADL score, safety score, 0.90	\$950.00	0.9	\$855.00								
	3/30/2022	David Marks	R/R email from Attorney J. Thornton re 4 missing fields in assessment exemplar + 12 additional fields not previously disclosed. Teleconference with Attorney Thornton re same 0.20	\$950.00	0.2	\$190.00								
	3/30/2022	David Marks	GoToMeeting with Attorney Thornton re assessment exemplar and discrepancy in prior assessment vs recently produced assessments 0.30	\$950.00	0.3	\$285.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked		General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
3/30/2022	David Marks	Email to Attorney B. Umpierre re missing 4 fields of data in new assessment exemplar. 0.10	\$950.00	0.1	\$95.00								
3/30/2022	Jim Thornton	Review of job descriptions for caregivers .4	\$500.00	0.4	\$200.00								
3/30/2022	Jim Thornton	Review of another set sample resident assessment data .3	\$500.00	0.3	\$150.00								
3/30/2022	Jim Thornton	Call with David Marks regarding sample assessment data .2	\$500.00	0.2	\$100.00								
3/30/2022	Jim Thornton	GoToMeeting with David Marks regarding assessment exemplar 0.3	\$500.00	0.3	\$150.00								
3/31/2022	David Marks	R/R email from Attorney B. Umpierre re Sunrise's response to 4 missing data fields in new assessment exemplar. 0.10	\$950.00	0.1	\$95.00								
3/31/2022	David Marks	Email to Attorneys C. Healey/B. Umpierre re importance of the 4 missing data fields, possible work around for 2 of the fields, and claims raised by Brookdale's simulation expert that underscore need for the missing fields. 0.10	\$950.00	0.1	\$95.00								
3/31/2022	David Marks	R/R proposed response by Attorneys B. Umpierre/ C. Healey to Sunrise refusal to produce room location 0.20	\$950.00	0.2	\$190.00								
4/1/2022	David Marks	R/R 9th Circuit's order granting Sunrise's 23(f) petition + Attorney C. Healey's email re same and briefing schedule .10	\$950.00	0.1	\$95.00								
4/4/2022	David Marks	Witness project: R/R email from Attorneys M. Yarnall, K. Stebner, C. Healey re class member out reach project 0.10	\$950.00	0.1	\$95.00								
4/4/2022	David Marks	Witness project: R/R email to set up call the week of April 11 to discuss witness project 0.10	\$950.00	0.1	\$95.00								
4/5/2022	David Marks	.ModFile Production: R/R emails from Attorneys C. Healey+ B. Umpierre re holding .modfile production until Sunrise responds to our request to produce outstanding discovery. 0.20	\$950.00	0.2	\$190.00								
4/5/2022	David Marks	RR email from Attorney C. Healey with Swartz's response declining to produce additional discovery. 0.10	\$950.00	0.1	\$95.00								
4/5/2022	Jim Thornton	Emails regarding .mod file production with team .3	\$500.00	0.3	\$150.00								
4/6/2022	David Marks	Additional Assessment Data for other Sunrise facilities: RR email from Attorney C. Healey to Swartz re Sunrise production of new assessment data and CEO correspondence. 0.10	\$950.00	0.1	\$95.00								
4/6/2022	David Marks	CA Investigator/Witness Project: Teleconference with Attorney B. Moss re a recommendation in CA for investigator with long term care investigation experience--he has used and recommends Kevin Caldwell .60	\$950.00	0.6	\$570.00								
4/6/2022	David Marks	Teleconference with K. Caldwell re witness project .70	\$950.00	0.7	\$665.00								
4/6/2022	David Marks	RR email from K. Caldwell with resume and rates. .10	\$950.00	0.1	\$95.00								
4/6/2022	Jim Thornton	Email from David Marks regarding list of facilities .1	\$500.00	0.1	\$50.00								
4/6/2022	Jim Thornton	Email from Brian Umpierre regarding discovery stay and opposition .2	\$500.00	0.2	\$100.00								
4/6/2022	Jim Thornton	Emails from Chris Healey regarding discovery .2	\$500.00	0.2	\$100.00								
4/7/2022	Jim Thornton	Work on list of facilities for investigator purposes and sent to David Marks .3	\$500.00	0.3	\$150.00								
4/8/2022	David Marks	Witness Project: R/R email from Attorney M. Yarnall, re class member out reach project to approx. 75% of class members. 70 possible people willing to give declarations. 0.10	\$950.00	0.1	\$95.00								
4/12/2022	David Marks	All discovery stayed: RR email from Attorney C.Healey with Order granting Sunrise's stay. .10	\$950.00	0.1	\$95.00								
4/12/2022	Jim Thornton	Email from Chris Healey regarding discovery stay .1	\$500.00	0.1	\$50.00								
4/19/2022	Jim Thornton	Email from Chris Healey regarding exemplar and data request .2	\$500.00	0.2	\$100.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
4/25/2022	Jim Thornton	Emails with Chris Healey and Brian Umpierre regarding reminder post appeal to follow up on exemplar email and request move-out data .3	\$500.00	0.3	\$150.00								
4/26/2022	David Marks	Receive and review Sunrise's email listing their issues on appeal with Attorney C. Healey email regarding same .10	\$950.00	0.1	\$95.00								
10/13/2022	David Marks	RR email from Attorney C. Healey re: Sunrise Appellate issue - "risk of future injury" (disallowed in TransUnion) vs actual economic harm. Question: Does record evidence support that Sunrise's staffing policy makes it highly likely that residence will be denied promised services at sometime? .10	\$950.00	0.1	\$95.00								
10/13/2022	David Marks	Review Dr. Flores and Schroyer's multiple Declarations for record evidence that Sunrise's detective staffing policy makes it highly likely that Sunrise residents will be denied promised services 0.90	\$950.00	0.9	\$855.00								
10/13/2022	Jim Thornton	Email from Chris Healey regarding appellate question regarding risk of harm .3	\$500.00	0.3	\$150.00								
10/13/2022	Jim Thornton	Emails with team regarding scheduling call to address .1	\$500.00	0.1	\$50.00								
10/14/2022	Jim Thornton	Emails regarding scheduling call regarding appellate issues .1	\$500.00	0.1	\$50.00								
10/17/2022	David Marks	Teleconference with Attorney Thornton regarding preparation for conference call regarding appellate response and economic harm issue on appeal (.40)	\$950.00	0.4	\$380.00								
10/17/2022	David Marks	Teleconference with Attorneys Thornton, Healey and Wallace regarding appellate response and economic harm issue on appeal .60	\$950.00	0.6	\$570.00								
10/17/2022	Jim Thornton	Call with Chris Healey, Guy Wallace, and David Marks regarding appellate response and risk of harm .6	\$500.00	0.6	\$300.00								
10/17/2022	Jim Thornton	Prep call with David Marks .4	\$500.00	0.4	\$200.00								
10/17/2022	Jim Thornton	Email with David Marks regarding deadline for appellate response .1	\$500.00	0.1	\$50.00								
10/17/2022	Jim Thornton	Received and reviewed and briefly review draft Flores Reply Dec from Brian Umpierre .2	\$500.00	0.2	\$100.00								
10/19/2022	Jim Thornton	Received and reviewed email from Guy Wallace regarding Table 3 task times .3	\$500.00	0.3	\$150.00								
10/19/2022	Jim Thornton	Research regarding Table 3 and sent David Marks email regarding same .4	\$500.00	0.4	\$200.00								
10/20/2022	Jim Thornton	Received and reviewed email from Brian Umpierre regarding Schnelle task time analyses .1	\$500.00	0.1	\$50.00								
10/20/2022	Jim Thornton	Responded to Umpierre email .2	\$500.00	0.2	\$100.00								
10/20/2022	Jim Thornton	W/on questions related to task times raised on appeal .3	\$500.00	0.3	\$150.00								
10/21/2022	Jim Thornton	Emails from Chris Healey and Lucy Valdez regarding Table 3 task time questions .4	\$500.00	0.4	\$200.00								
11/7/2022	David Marks	Teleconference with Attorney Chris Healey/team re preliminary discussion outline of Plaintiff's Answering Brief. .30	\$950.00	0.3	\$285.00			0.3	285				
11/7/2022	Jim Thornton	Received and briefly reviewed structure of Sunrise's appellate brief .3	\$500.00	0.3	\$150.00								
11/8/2022	David Marks	RR Plaintiff's/Appellee's Answering Brief. 1.30	\$950.00	1.3	\$1,235.00								
11/9/2022	David Marks	Teleconference with CA team re: Answering Brief. .90	\$950.00	0.9	\$855.00			0.9	855				
11/14/2022	David Marks	RR Attorney C. Healey email re: Rocket Mortgage decision and distinguishing facts in Sunrise. .20	\$950.00	0.2	\$190.00								
11/18/2022	David Marks	RR multiple emails from Attorney C. Healey Re: Amicus meeting and any literature on understaffing impacting ALFs. .20	\$950.00	0.2	\$190.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
11/19/2022	David Marks	Teleconference with Attorney Thornton regarding ALF literature research project in connection with Amicus support .20	\$950.00	0.2		\$190.00								
11/19/2022	David Marks	Email to Attorney C. Healey seeking clarification about ALF literature. .10	\$950.00	0.1		\$95.00								
11/19/2022	Jim Thornton	Call from David Marks regarding requested ALF literature research project .2	\$500.00	0.2		\$100.00								
11/22/2022	Jim Thornton	Emails with Cristina Flores regarding literature review to assist Chris Healey in appellate arguments .3	\$500.00	0.3		\$150.00								
12/6/2022	David Marks	Teleconference with Attorney Thornton regarding (1) response to Attorney C. Healey Amicus support question and (2) edits to Plaintiff's draft Answering Brief 1.00	\$950.00	1		\$950.00								
12/6/2022	David Marks	Email to Attorney C. Healey re: ALF staffing literature. .10	\$950.00	0.1		\$95.00								
12/6/2022	Jim Thornton	Continue work on scoring system analysis .7	\$500.00	0.7		\$350.00								
12/6/2022	Jim Thornton	GoToMeeting w/ David Marks regarding class cert reply and point system used by Sunrise 2.7	\$500.00	2.7		\$1,350.00								
12/6/2022	Jim Thornton	Telephone call with David Marks to discuss key issues raised in Defendants' opposition to class certification .3	\$500.00	0.3		\$150.00								
12/6/2022	Jim Thornton	Work on email to California Team with questions regarding point system .6	\$500.00	0.7		\$350.00								
12/7/2022	David Marks	RR new JAMA network article from Dr. Flores re: staffing ALFs. .30	\$950.00	0.3		\$285.00								
12/7/2022	David Marks	RR email from Attorney C. Healey re: North Carolina staffing requirements in ALFs and any legislative findings supporting the same. .10	\$950.00	0.1		\$95.00								
12/9/2022	David Marks	Research North Carolina ALF staffing and legislative hearings/findings supporting regulations. .70	\$950.00	0.7		\$665.00								
12/9/2022	David Marks	Emails to Attorney C. Healey re: no legislative findings or regulatory report. .10	\$950.00	0.1		\$95.00								
12/12/2022	David Marks	RR email from Attorney C. Healey re: Sunrise settlement inquiry from Charlie Lee. .10	\$950.00	0.1		\$95.00								
12/12/2022	David Marks	Teleconference with Attorney C. Healey to discuss Witness Project .30	\$950.00	0.3		\$285.00								
12/13/2022	David Marks	Witness Project: emails to/from Attorney B. Umpierre re: class rep medical records and of unhappy campers containing names of employees. .20	\$950.00	0.2		\$190.00								
12/13/2022	David Marks	Teleconference with Attorney C. Healey re: same. .20	\$950.00	0.2		\$190.00								
12/20/2022	David Marks	Witness Project: RR multiple emails from Attorney B. Umpierre re: names of caregivers appearing in 53 medical records produced by Sunrise. .10	\$950.00	0.1		\$95.00								
12/20/2022	David Marks	Review of medical records sent by Attorney B. Umpierre. .90	\$950.00	0.9		\$855.00								
12/20/2022	David Marks	Meeting with H. Fleming re: locating of caregivers identified in medical records and interview questions/strategy. 0.6	\$950.00	0.6		\$570.00								
12/23/2022	David Marks	RR Sunrise updated answering brief (from Attorney C. Healey) focusing on Flores/Schroyer/staffing issues. 1.40	\$950.00	1.4		\$1,330.00								
1/1/2023	Jim Thornton	Began review of appellate reply brief .6	\$500.00	0.6		\$300.00								
1/2/2023	David Marks	RR Attorney J. Thornton preliminary edits to Sunrise appeal. .40	\$950.00	0.4		\$380.00								
1/2/2023	David Marks	Prepare list of points/issues for discussion with J. Thornton re: Sunrise staff travel time record support in Flores Declaration. .50	\$950.00	0.5		\$475.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/2/2023	David Marks	Teleconference with Attorney J. Thornton regarding Answering Brief .30	\$950.00	0.3	\$285.00								
1/2/2023	Jim Thornton	Detailed review and editing of reply brief 2.3	\$500.00	2.3	\$1,150.00								
1/2/2023	Jim Thornton	Email to David Marks regarding reply brief .5	\$500.00	0.5	\$250.00								
1/2/2023	Jim Thornton	Email to David Marks regarding anodyne question .1	\$500.00	0.1	\$50.00								
1/2/2023	Jim Thornton	Call from David Marks regarding reply brief and edits .3	\$500.00	0.3	\$150.00								
1/2/2023	Jim Thornton	Continued analysis of Sunrise's response on appeal .5	\$500.00	0.5	\$250.00								
1/3/2023	David Marks	RR multiple emails from Attorney J. Thornton re: Sunrise appeal and supporting record references. .30	\$950.00	0.3	\$285.00								
1/3/2023	David Marks	Continue research of Sunrise record references for Answering Brief .40	\$950.00	0.4	\$380.00								
1/3/2023	David Marks	GoToMeeting with Attorney J. Thornton re: edits and comments to Plaintiff's Answering brief. 1.70	\$950.00	1.7	\$1,615.00								
1/4/2023	David Marks	Receive and review updated draft from Attorney C. Healey Plaintiff's Answering Brief to 9th Cir. 1.20	\$950.00	1.2	\$1,140.00								
1/4/2023	David Marks	Teleconference regarding Answering Brief 1.0	\$950.00	1	\$950.00								
1/4/2023	David Marks	GoToMeeting with Attorney J. Thornton regarding review of Attorney C. Healey's updated draft appellee brief 1.40	\$950.00	1.4	\$1,330.00								
1/4/2023	David Marks	GoToMeeting with Attorney J. Thornton discussing to do's for the Answering Brief and the agenda for upcoming call .50	\$950.00	0.5	\$475.00								
1/4/2023	David Marks	Receive and review Attorney Thornton's email regarding the "compliance section" of drafts Sunrise injunction .30	\$950.00	0.3	\$285.00								
1/4/2023	Jim Thornton	Noted Chris Healey's edits to our latest draft and sent to David Marks .3	\$500.00	0.3	\$150.00								
1/4/2023	Jim Thornton	Review of and email abuse of discretion case to David Marks .3	\$500.00	0.3	\$150.00								
1/4/2023	Jim Thornton	GoToMeeting with David Marks regarding review of Healey's updated draft appellee brief 1.4	\$500.00	1.4	\$700.00								
1/4/2023	Jim Thornton	W/on email to Chris Healey regarding Schroyer section of Brief .3	\$500.00	0.3	\$150.00								
1/4/2023	Jim Thornton	GoToMeeting with David Marks discussing and analyzing agenda for afternoon call .5	\$500.00	0.5	\$250.00								
1/5/2023	David Marks	GoToMeeting with Attorney Thornton regarding work on appellant brief and key language from Flores and Schroyer various Declarations 1.80	\$950.00	1.8	\$1,710.00								
1/5/2023	David Marks	GoToMeeting with Attorney J. Thornton regarding continuing revisions/edits to the Answering Brief 3.50	\$950.00	3.5	\$3,325.00								
1/5/2023	Jim Thornton	GoToMeeting with David Marks working on appellant brief and language concerning Flores and Schroyer 1.8	\$500.00	1.8	\$900.00								
1/5/2023	Jim Thornton	Independent work on incorporating court findings and references to staffing methodology defects 2.0	\$500.00	2	\$1,000.00								
1/5/2023	Jim Thornton	GoToMeeting with David Marks editing my additions and reviewing entirety of brief 3.5	\$500.00	3.5	\$1,750.00								
1/9/2023	David Marks	GoToMeeting with Attorney Thornton regarding review and edit of 9th Cir. brief 1.60	\$950.00	1.6	\$1,520.00								
1/9/2023	Jim Thornton	Review of brief .7	\$500.00	0.7	\$350.00								
1/9/2023	Jim Thornton	GoToMeeting with David Marks continuing w/on review and edit of brief 1.7	\$500.00	1.7	\$850.00								
1/12/2023	David Marks	Work on Answering Brief - Schroyer/Flores .30	\$950.00	0.3	\$285.00								
1/12/2023	David Marks	Defective staffing sections 1.60	\$950.00	1.6	\$1,520.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
Fees							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/12/2023	David Marks	Review Attorney Thornton's edits and comments of latest Answering Brief GoToMeeting with Attorney Thornton re: edits to Answering brief [.60]	\$950.00	0.6		\$570.00								
1/12/2023	Jim Thornton	Review of latest draft of brief and sent David Marks specific edits and comments [.9]	\$500.00	0.9		\$450.00								
1/12/2023	Jim Thornton	GoToMeeting with David Marks regarding edits to Answering Brief [.6]	\$500.00	0.6		\$300.00								
1/13/2023	David Marks	Review email from Attorney Thornton re: Schroyer section of Answering Brief [.10]	\$950.00	0.1		\$95.00								
1/13/2023	Jim Thornton	Review of updated draft of brief [.6]	\$500.00	0.6		\$300.00								
1/13/2023	Jim Thornton	Email to David Marks regarding Schroyer section [.1]	\$500.00	0.1		\$50.00								
1/14/2023	David Marks	Rework footnote references in Answering Brief staffing section [.10]	\$950.00	1.1		\$1,045.00								
1/14/2023	David Marks	Reviewed Attorney Thornton's response re: the edited footnotes re: sampled data [.2]	\$950.00	0.2		\$190.00								
1/14/2023	David Marks	Review Attorney Thornton's email re: question regarding sample data used as referenced in Answering Brief [.3]	\$950.00	0.3		\$285.00								
1/14/2023	Jim Thornton	Review of edited footnote regarding sampled data and responded to David Marks [.2]	\$500.00	0.2		\$100.00								
1/14/2023	Jim Thornton	Review of Schroyer Reply Dec [.2]	\$500.00	0.2		\$100.00								
1/14/2023	Jim Thornton	Email to David Marks regarding question regarding sample data used as referenced in Answering Brief [.1]	\$500.00	0.1		\$50.00								
1/23/2023	David Marks	RR "close to final" Answering Brief [.70]	\$950.00	0.7		\$665.00								
1/23/2023	Jim Thornton	Received close to final draft of brief for review [.1]	\$500.00	0.1		\$50.00								
1/24/2023	David Marks	Review/integrate final edits from Attorney Thornton re: Appellee's Answering Brief and send to CA team [.10]	\$950.00	0.1		\$95.00								
1/24/2023	Jim Thornton	Review of Appellee's Answering Brief and proofed same [.15]	\$500.00	1.5		\$750.00								
1/24/2023	Jim Thornton	Sent minor edits to David Marks [.3]	\$500.00	0.3		\$150.00								
2/6/2023	Jim Thornton	Received and reviewed status report from Chris Healey [.2]	\$500.00	0.2		\$100.00								
3/14/2023	David Marks	Conference call re: Sunrise settlement proposal [.60]	\$950.00	0.6		\$570.00								
3/22/2023	David Marks	RR Sunrise Appellant Reply Brief [.80]	\$950.00	0.8		\$760.00								
3/27/2023	David Marks	Teleconference with team regarding Defendant's Reply Brief and oral argument prep [.100]	\$950.00	1		\$950.00			1	950				
5/30/2023	David Marks	Prepare for Appellate Moot Court and review/edit Attorney C. Healey's draft Opening Argument [.140]	\$950.00	1.4		\$1,330.00								
5/30/2023	David Marks	Participate in Appellate Moot Court [.160]	\$950.00	1.6		\$1,520.00								
6/14/2023	David Marks	Call with Attorney Thornton re: oral argument prep [.20]	\$950.00	2		\$1,900.00								
6/14/2023	David Marks	Review Attorney Thornton's email re: Flores decs and appellee's brief [.20]	\$950.00	0.2		\$190.00								
6/14/2023	Jim Thornton	Call from David Marks regarding oral argument prep [.2]	\$500.00	0.2		\$100.00								
6/14/2023	Jim Thornton	Pulled Flores decs and appellee's brief and sent to David Marks [.2]	\$500.00	0.2		\$100.00								
6/20/2023	David Marks	Teleconference with Attorney Thornton re: oral argument [.10]	\$950.00	0.1		\$95.00								
6/20/2023	David Marks	Review Attorney Thornton's email re: Flores dec related to billing history and base service levels [.10]	\$950.00	0.1		\$95.00								
6/20/2023	David Marks	Moot Court, part 2. [.180]	\$950.00	1.8		\$1,710.00								
6/20/2023	Jim Thornton	Call from David Marks regarding oral argument prep [.1]	\$500.00	0.1		\$50.00								
6/20/2023	Jim Thornton	Review of Flores dec related to billing service history and base service levels and sent same to David Marks [.2]	\$500.00	0.2		\$100.00								
7/11/2023	Jim Thornton	Received and reviewed emails from team regarding oral argument [.2]	\$500.00	0.2		\$100.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
7/12/2023	David Marks	Teleconference with Attorney J. Thornton re: oral arguments and expected timeframe for ruling [.10]	\$950.00	0.1		\$95.00								
7/12/2023	Jim Thornton	Call with David Marks regarding oral argument and expected timeframe for ruling [.1]	\$500.00	0.1		\$50.00								
7/13/2023	Jim Thornton	Watched video of oral argument [.6]	\$500.00	0.6		\$300.00								
8/2/2023	Jacques Balette	Review Ninth Circuit Opinion	\$750.00	0.4		\$300.00								
8/2/2023	Jim Thornton	Briefly reviewed 9th Circuit decision and multiple emails regarding same [.3]	\$500.00	0.3		\$150.00								
8/17/2023	Jim Thornton	Reviewed status update email from Chris Healey and discussed with David Marks [.3]	\$500.00	0.3		\$150.00								
8/25/2023	David Marks	Receive and review Attorney C. Healey's email of 8/24/2023 regarding the 9th Cir. Mandate, termination of prior Order, and pending discovery and compare email to Attorney J. Thornton regarding Sunrise data required for additional staffing simulation [.30]	\$950.00	0.3		\$285.00								
8/25/2023	Jim Thornton	Review of proposed meet and confer letter [.3]	\$500.00	0.3		\$150.00								
8/25/2023	Jim Thornton	Review of prior simulation data pulled and planned for likely production [.3]	\$500.00	0.3		\$150.00								
8/25/2023	Jim Thornton	Email sent David Marks regarding simulation data [.2]	\$500.00	0.2		\$100.00								
8/28/2023	David Marks	Teleconference with Attorney C. Healey regarding discovery and trial prep [.60]	\$950.00	0.6		\$570.00								
9/2/2023	David Marks	R/R Attorney C. Healey email regarding Williams v. MGM 129 F3d 1026, Lowery v. Rhapsody 75F.4th 995, Allen v. Bedolla 787 F3d 1218, and settlement issue [.20]	\$950.00	0.2		\$190.00								
9/2/2023	David Marks	Legal research - regard 9th Circuit approval of settlement Williams 129 F3d 102 and Lowery v. Rhapsody Integrate into settlement meeting notebook [.40]	\$950.00	0.4		\$380.00								
9/3/2023	David Marks	R/R Attorney C. Healey email re: injunctive settlement issues and injunctive relief [.10]	\$950.00	0.1		\$95.00								
9/5/2023	Jim Thornton	Emails from team related to call to discuss discovery and to dos [.3]	\$500.00	0.3		\$150.00								
9/6/2023	Jim Thornton	Additional emails regarding call schedule [.2]	\$500.00	0.2		\$100.00								
9/7/2023	Jim Thornton	Work with David Marks regarding upcoming team call [.1]	\$500.00	0.1		\$50.00								
9/8/2023	David Marks	Work with Attorney Thornton on needed discovery in advance of team calls [.6]	\$950.00	0.6		\$570.00								
9/8/2023	David Marks	Review email from Attorney Thornton regarding needed discovery [.10]	\$950.00	0.1		\$95.00								
9/8/2023	David Marks	GoToMeeting with Chris Healey, Brian Umpierre, and Attorney Thornton re: status of case and to-dos [1.0]	\$950.00	1		\$950.00								
9/8/2023	Jim Thornton	Multiple emails regarding afternoon call with team [.2]	\$500.00	0.2		\$100.00								
9/8/2023	Jim Thornton	Worked with David Marks on needed discovery in advance of team call [.6]	\$500.00	0.6		\$300.00								
9/8/2023	Jim Thornton	Sent email to David Marks regarding needed discovery [.1]	\$500.00	0.1		\$50.00								
9/8/2023	Jim Thornton	GoToMeeting with Chris Healey, Brian Umpierre, David Marks regarding status of case and to-dos [1.0]	\$500.00	1		\$500.00								
9/12/2023	David Marks	R/R Attorney C. Healey email re: Sunrise mediation date - calendar [.10]	\$950.00	0.1		\$95.00								
9/13/2023	David Marks	Trial Preparation: Review Attorney J. Thornton's email re: floor plans for additional facility [.1]	\$950.00	0.1		\$95.00								
9/13/2023	Jim Thornton	Received and reviewed floorplans for additional facilities [.2]	\$500.00	0.2		\$100.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
9/13/2023	Jim Thornton	Forwarded floorplans to Sterling Meachen, Blake Peters, and David Marks .1	\$500.00	0.1	\$50.00								
9/13/2023	Jim Thornton	Received and reviewed Chris Healey's email regarding motion to extend class period .2	\$500.00	0.2	\$100.00								
9/13/2023	Jim Thornton	Researched and prepared draft response to simulation specific questions posed .3	\$500.00	0.3	\$150.00								
9/14/2023	Jim Thornton	Pulled and sent Brian Umpierre bates numbers for defense's production of assessment data for purposes of ensuring data fields remain the same .2	\$500.00	0.2	\$100.00								
9/14/2023	Jim Thornton	Emails with Brian Umpierre regarding production of mod files versus packages .3	\$500.00	0.3	\$150.00								
9/18/2023	Jim Thornton	Reviewed Brian Umpierre's status from meet and confer and Chris Healey's thoughts on same .3	\$500.00	0.3	\$150.00								
9/20/2023	David Marks	R/R eval from Attorney C. Healey re Sunrise and McKnight article well tower business update (18 facilities remain) and settlement (move-in fees vs service fees). Integrate into settlement meeting notebook .40	\$950.00	0.4	\$380.00								
9/20/2023	Jim Thornton	Received email from Chris Healey related to punch detail data, attaching 2010 letter from defense .2	\$500.00	0.2	\$100.00								
9/21/2023	Jim Thornton	Received request from Brian Umpierre for language regarding importance of room number data .2	\$500.00	0.2	\$100.00								
9/22/2023	David Marks	Teleconference and work with Attorney J. Thornton regarding request from Brian Umpierre for language re: importance of room number data .30	\$950.00	0.3	\$285.00								
9/22/2023	Jim Thornton	Call and work with David Marks regarding request from Brian Umpierre for language regarding importance of room number data .4	\$500.00	0.4	\$200.00								
9/22/2023	Jim Thornton	Received and reviewed emails regarding room numbers .2	\$500.00	0.2	\$100.00								
9/26/2023	David Marks	Email Attorney Thornton related to punch detail data, attaching 2010 letter from defense .2	\$950.00	0.2	\$190.00								
9/26/2023	Jim Thornton	Received email from David Marks related to punch detail data, attaching 2010 letter from defense .2	\$500.00	0.2	\$100.00								
10/31/2023	David Marks	Send email to team regarding trial preparation meeting and materials to assemble for same .10	\$950.00	0.1	\$95.00								
10/31/2023	David Marks	Prepare for settlement strategy meeting, identify/compare list of critical documents/materials needed for the meeting and email list to team with explanation .80	\$950.00	0.8	\$760.00								
10/31/2023	Jim Thornton	Emails from team regarding trial prep meeting .2	\$500.00	0.2	\$100.00								
11/1/2023	David Marks	R/R letter to Gibson/Dunn re: (1) concerns about listing of class members and the date class period ends (and Judge's state's order), (2) issues regarding assessment data, (3) issues regarding production of pendant data, and (4) other outstanding discovery .20	\$950.00	0.2	\$190.00								
11/1/2023	David Marks	Simulation project: Research and prepare to do list of projects, updating for DES Sunrise simulation for other Sunrise facilities technical and email to JGT re: same .6	\$950.00	0.6	\$570.00								
11/1/2023	Jim Thornton	Review of trial proof matrix .2	\$500.00	0.2	\$100.00								
11/1/2023	Jim Thornton	Discussed matrix briefly with David Marks .1	\$500.00	0.1	\$50.00								
11/2/2023	Jim Thornton	Email from David Marks regarding census matching assessments .1	\$500.00	0.1	\$50.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
11/2/2023	Jim Thornton	Brief research regarding census and responded to David Marks [.2]	\$500.00	0.2	\$100.00								
11/3/2023	David Marks	Teleconference with Attorney J. Thornton regarding same [.50]	\$950.00	0.5	\$475.00								
11/3/2023	David Marks	Teleconference with Attorneys C. Healey, B. Umpierre, G. Wallace, K. Stebner, M. Yarnall, S. Warren, and J. Thornton [.20]	\$950.00	0.2	\$190.00								
11/3/2023	David Marks	Teleconference with team regarding mediation in Philly on January 10th - 11th, 2024, case schedule, and discovery. Need to bring proof of family observations, outrage/complaints regarding long waits for service [1.20]	\$950.00	1.2	\$1,140.00			1.2	1140				
11/3/2023	Sterling Meachen	Given raw data of facilities with year and total care givers actual PPD hours. Organized and compiled data into simple line graphs; Confer with Marks.	\$225.00	7.2	\$1,620.00	7.2	\$1,620.00						
11/3/2023	Jim Thornton	Received and reviewed analysis of census from Blake Peters [.1]	\$500.00	0.1	\$50.00								
11/3/2023	Jim Thornton	Email from David Marks regarding date ranges of data [.1]	\$500.00	0.1	\$50.00								
11/3/2023	Jim Thornton	Calls with and discussed date ranges of available data with David Marks [.5]	\$500.00	0.5	\$250.00								
11/3/2023	Jim Thornton	Conference call with Chris Healey, Brian Umpierre, Guy Wallace, Kathryn Sterner, Megan Yarnall, and David Marks regarding upcoming mediation [1.2]	\$500.00	1.2	\$600.00								
11/6/2023	Jim Thornton	Emails from Blake Peters and to David Marks regarding date ranges for punch detail staffing data [.1]	\$500.00	0.1	\$50.00								
11/6/2023	Jim Thornton	Received and reviewed PPD hours comparison from Blake Peters [.1]	\$500.00	0.1	\$50.00								
11/6/2023	Sterling Meachen	Finished organizing into the simple line graphs – which then were transposed via Illustrator into individual slides to be dispersed. Highlighting final few months in red	\$225.00	7	\$1,575.00	7	\$1,575.00						
11/7/2023	David Marks	Call Attorney Yarnall regarding class member outreach progress - finding outraged families and video of witnesses [.30]	\$950.00	0.3	\$285.00								
11/7/2023	Jim Thornton	Emails from Blake Peters and to David Marks regarding date ranges for punch detail staffing data [.1]	\$500.00	0.1	\$50.00								
11/7/2023	Jim Thornton	Received and reviewed PPD hours comparison from Blake Peters [.1]	\$500.00	0.1	\$50.00								
11/7/2023	Jim Thornton	GoToMeeting with David Marks, Sterling Meachen and Blake Peters regarding same and witness project [.4]	\$500.00	0.4	\$200.00								
11/7/2023	Sterling Meachen	Creation of questionnaire and answer graphics regarding 10 critical factors in establishing care needs into Illustrator	\$225.00	5.5	\$1,237.50								
11/8/2023	Jacques Balette	Conference with attorneys and investigator re: video witness statements to be taken and used for mediation and trial	\$750.00	0.7	\$525.00								
11/8/2023	David Marks	Review Sunrise class list produced by Gorman with family and review letter to class regarding care/staff concerns [.20]	\$950.00	0.2	\$190.00								
11/8/2023	David Marks	Assign employee witness extraction object to Attorney J. Thornton. Discuss spreadsheet. [.20]	\$950.00	0.2	\$190.00								
11/8/2023	David Marks	Teleconference with Harry Fleming regarding investigation/outreach to class members and family witness video project [.70]	\$950.00	0.7	\$665.00								
11/8/2023	David Marks	Receive and review email from Attorney Healey regarding Attorney Yarnall/K. Ellis assist on video outraged families [.10]	\$950.00	0.1	\$95.00								
11/8/2023	David Marks	Receive and review Attorney Yarnall/K. Ellis interviewer template for class members [.40]	\$950.00	0.4	\$380.00								
11/8/2023	David Marks	Revise/update interview template for screening/gathering info from class member families [.80]	\$950.00	0.8	\$760.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
11/8/2023	David Marks	Teleconference with Attorney Balette, Attorney Moss, and Harry Fleming regarding info needed to make video witness selection. Integrate suggestions .70	\$950.00	0.7	\$665.00								
11/8/2023	Jim Thornton	Call with David Marks related to witness project .1	\$500.00	0.1	\$50.00								
11/8/2023	Jim Thornton	Prepared template spreadsheet for witness identity capture and sent to team .2	\$500.00	0.2	\$100.00								
11/8/2023	Sterling Meachen	Graphically illustrated the bundling impact onto scare services in mathematical format. Keying off them into morning, dining, housekeeping, and travel time bundling.	\$225.00	6.4	\$1,440.00	6.4	\$1,440.00						
11/9/2023	David Marks	4 teleconferences with Harry Fleming regarding family witness contact background checks and schedule .30	\$950.00	0.3	\$285.00								
11/9/2023	David Marks	Receive and review emails from Attorney Healey/Attorney Thamer regarding interview of 2 former Sunrise employees by Attorney Thamer .20	\$950.00	0.2	\$190.00								
11/9/2023	David Marks	Teleconference with Attorney C. Healey medical files for potential witnesses .20	\$950.00	0.2	\$190.00								
11/9/2023	David Marks	Teleconference with Attorney C. Healey regarding class member and mediation presentation .30	\$950.00	0.3	\$285.00								
11/9/2023	Jim Thornton	Emails from Brian Umpierre and David Marks related to sample assessment data .1	\$500.00	0.1	\$50.00								
11/9/2023	Jim Thornton	Reviewed sample assessment data .2	\$500.00	0.2	\$100.00								
11/9/2023	Jim Thornton	Review of witness project names pulled from records and email to David Marks regarding same .3	\$500.00	0.3	\$150.00								
11/9/2023	Jim Thornton	W/on witness project list--identities of possible witnesses 1.9	\$500.00	1.9	\$950.00								
11/9/2023	Sterling Meachen	Using google earth "My Maps" created a grid using the addresses of all homes in the Los Angeles area. Snapshot this graphic and imported into illustrator.	\$225.00	6.9	\$1,552.50	6.9	\$1,552.50						
11/10/2023	David Marks	Family Witness Project: Review initial class member witness memos from Attorney Yarnall 2.00	\$950.00	2	\$1,900.00								
11/10/2023	David Marks	Send to Harry Fleming to add to class member witness lead list. Assign S. Zvonek task of putting key info in spreadsheet .30	\$950.00	0.3	\$285.00								
11/10/2023	Jim Thornton	Call and GoToMeeting with Blake Peters regarding sample assessment data .9	\$500.00	0.9	\$450.00								
11/10/2023	Jim Thornton	Call with David Marks regarding same and prep of email to Brian Umpierre regarding adequacy of sample .9	\$500.00	0.9	\$450.00								
11/10/2023	Sterling Meachen	Using google earth "My Maps" created a grid using the addresses of all homes in the San Francisco area. Snapshot this graphic and imported into illustrator.	\$225.00	6.4	\$1,440.00	6.4	\$1,440.00						
11/13/2023	Jacques Balette	Review 9 witness binders in preparation of witness interview project	\$750.00	3.4	\$2,550.00								
11/13/2023	David Marks	Two teleconferences with H. Fleming to review interview of employee Samantha Detwiler .20	\$950.00	0.2	\$190.00								
11/13/2023	David Marks	Assign H. Fleming tasks of following up interview from former employees .10	\$950.00	0.1	\$95.00								
11/13/2023	Jim Thornton	Emails with Sterling Meachen regarding map of Sunrise locations .3	\$500.00	0.3	\$150.00								
11/13/2023	Jim Thornton	Emails with David Marks related to simulation tracking per day and per shift and exploring testing of peak times per TCB project .3	\$500.00	0.3	\$150.00								
11/13/2023	Jim Thornton	Research regarding TCB peak times .2	\$500.00	0.2	\$100.00								
11/13/2023	Jim Thornton	Emails with David Marks regarding task time standards .3	\$500.00	0.3	\$150.00								

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						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
11/13/2023	Sterling Meachen	Confer with Attorney Marks regarding facility map [.4]	\$225.00	0.4	\$90.00								
11/13/2023	Sterling Meachen	Began building the reformat of the beginning section of the presentation highlighting failure to disclose staffing and large map with dots of all facilities in California [.5]	\$225.00	5.9	\$1,327.50								
11/14/2023	Brent Moss	Review email from Atty. DTM RE: Sunrise family witnesses, videos and spreadsheet	\$750.00	0.30	\$225.00								
11/14/2023	Brent Moss	Review email from Atty. DTM RE: Sunrise family witness statements	\$750.00	1.00	\$750.00								
11/14/2023	David Marks	Receive and review S. Zvonek emails with class member spreadsheets of families that have been interviewed and recontacted [.20]	\$950.00	0.2	\$190.00								
11/14/2023	David Marks	Conference with S. Meachen regarding mediation slide showing location maps of facilities where outraged family witnesses had residents [.10]	\$950.00	0.1	\$95.00								
11/14/2023	David Marks	Review initial draft and provide edits [.10]	\$950.00	0.1	\$95.00								
11/14/2023	David Marks	Receive, review, and analyze spreadsheet from S. Zvonek identifying former employees of Sunrise facilities teleconference with H. Fleming [.20]	\$950.00	0.2	\$190.00								
11/14/2023	David Marks	3 teleconferences to/from H. Fleming regarding contacting, scheduling, and preliminary report of interviews [.80]	\$950.00	0.8	\$760.00								
11/14/2023	David Marks	Receive and review email from H. Fleming regarding map of location of potential family witnesses for videos [.1]	\$950.00	0.1	\$95.00								
11/14/2023	David Marks	Teleconference with H. Fleming regarding strategy to obtaining videos [.2]	\$950.00	0.2	\$190.00								
11/14/2023	David Marks	Prep for upcoming meeting with team regarding trial of Sunrise case, compile initial table of contents for meeting [.2.30]	\$950.00	2.3	\$2,185.00								
11/14/2023	David Marks	Initial identification of family witness video project key subjects and points to include in videos and email to H. Fleming regarding same [.5]	\$950.00	0.5	\$475.00								
11/14/2023	Jim Thornton	Pulled and sent Sunrise task times to David Marks [.2]	\$500.00	0.2	\$100.00								
11/14/2023	Sterling Meachen	Highlighting a key page from Batchelor-Murphy task time study, created slides posting the findings of providing feeding assistance [.5.7]	\$225.00	5.7	\$1,282.50								
11/14/2023	Sterling Meachen	Meet with Marks regarding task time slides [.3]	\$225.00	0.3	\$67.50								
11/15/2023	Jacques Balette	Confer with team to crease questions for video witnesses focusing on personal knowledge of staffing, complaints, etc.	\$750.00	1.2	\$900.00			1.2	900				
11/15/2023	David Marks	Teleconference with H. Fleming regarding status/update family witness project [.30]	\$950.00	0.3	\$285.00								
11/15/2023	David Marks	Mediation Prep: Confer with S. Meachen regarding graphic for mediation - comparing Sunrise feeding times to Batchelor-Murphy feeding time and email article to S. Meachen [.3]	\$950.00	0.3	\$285.00								
11/15/2023	David Marks	Receive and review graphic for mediation regarding comparison of feeding - times request that source of Batchelor article be added [.20]	\$950.00	0.2	\$190.00								
11/15/2023	David Marks	Receive, review, and edit S. Meachen CA map of Sunrise facilities in LA and San Francisco areas [.20]	\$950.00	0.2	\$190.00								
11/15/2023	David Marks	Create key video questions for family of class members. Discuss key points with interview tea (Attorney Balette, Attorney Moss, and H. Fleming) 1.30]	\$950.00	1.3	\$1,235.00								
11/15/2023	Jim Thornton	Review of draft slides for mediation [.2]	\$500.00	0.2	\$100.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
11/15/2023	Sterling Meachen	Map slides created using Google Earth My Maps updated to include individual boxes of each facility, it's city and outlined in red if location of class member 6.1	\$225.00	6.1	\$1,372.50	6.1	\$1,372.50						
11/15/2023	Sterling Meachen	Review article forwarded by Marks .3	\$225.00	0.3	\$67.50								
11/16/2023	David Marks	Received and reviewed email from K. Ellis regarding 9 new potential family witness videos .10	\$950.00	0.1	\$95.00								
11/16/2023	David Marks	Discuss with H. Fleming .10	\$950.00	0.1	\$95.00								
11/16/2023	Sterling Meachen	Using Illustrator and Acrobat created graphics and slides using snippets of the admission agreement highlighting Sunrise ownership, providing appropriate services, and assessments	\$225.00	6.4	\$1,440.00	6.4	\$1,440.00						
11/17/2023	David Marks	Receive and review email from K. Ellis with 9 new witness interviews based on update template (Beverly Hills, Mission Viejo, Fullerton Studio City, Playa Vista, Palo Alto, Belmont and Bonita family witnesses), Review completed interviews, indentifying key points and evaluate witness subject matter 3.70	\$950.00	3.7	\$3,515.00								
11/17/2023	David Marks	Receive and review email from Attorney C. Healey regarding witness project - recent current evidence of staffing problems .10	\$950.00	0.1	\$95.00								
11/17/2023	David Marks	Email from Attorney Healey regarding start time of trial prep meeting in Texas .10	\$950.00	0.1	\$95.00								
11/17/2023	Sterling Meachen	Prepared a graphic in Illustrator outlining a variety of marketing assets and staffing formula outlining communication to residents and families	\$225.00	6.6	\$1,485.00	6.6	\$1,485.00						
11/20/2023	Jacques Balette	Meet with Attorney Marks and Attorney Moss re: questionnaire template	\$750.00	0.6	\$450.00								
11/20/2023	David Marks	Receive and review updated family witness spreadsheet .10	\$950.00	0.1	\$95.00								
11/20/2023	David Marks	Receive and review follow up info regarding Bonita family witness - identity of private caregivers hired by her to assist mother/father at Sunrise .30	\$950.00	0.3	\$285.00								
11/20/2023	David Marks	Receive and review status update from K. Ellis for new interviews with family witnesses .10	\$950.00	0.1	\$95.00								
11/20/2023	David Marks	Email to/from Attorney Healey/Attorney Umpierre regarding move-in fee for each class member Sunrise has already produced the aggregate amount of move-in .20	\$950.00	0.2	\$190.00								
11/20/2023	David Marks	Receive and review email/attachment from K. Ellis regarding Belmont family witness's completed interview and hand written journal regarding Sunrise observations .60	\$950.00	0.6	\$570.00								
11/20/2023	David Marks	2 teleconferences with H. Fleming regarding status/update of family witness project .30	\$950.00	0.3	\$285.00								
11/20/2023	David Marks	Email K. Ellis regarding question about (1) initial witness interview of Belmont family witness and her handwritten journal and (2) separate Belmont family witness's phone number .10	\$950.00	0.1	\$95.00								
11/20/2023	David Marks	Receive and review email from K. Ellis with attachment containing email written by Belmont family witness to Sunrise corporate about care/staffer .40	\$950.00	0.4	\$380.00								
11/20/2023	David Marks	Update video interview questionnaire template send to H. Fleming .4	\$950.00	0.4	\$380.00								
11/20/2023	David Marks	Discuss with Attorney Balette/Attorney Moss .2	\$950.00	0.2	\$190.00								
11/20/2023	Jim Thornton	Emails with team regarding move-in fee data .3	\$500.00	0.3	\$150.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
11/21/2023	David Marks	Receive, review, and update family witness spreadsheet from S. Zvonek [.10]	\$950.00	0.1	\$95.00								
11/21/2023	David Marks	Receive and review email from Attorney Healey regarding start and end time of Texas trial prep meeting [.10]	\$950.00	0.1	\$95.00								
11/21/2023	David Marks	Receive and review email from K. Ellis with attachments containing initial completed initial witness interview questionnaire of Carmichael, La Costa, and Fresno family witnesses [.80]	\$950.00	0.8	\$760.00								
11/21/2023	Jim Thornton	Emails with Blake Peters and David Marks regarding service code counts [.3]	\$500.00	0.3	\$150.00								
11/22/2023	David Marks	Prep for interview with Bonita family witness [.70]	\$950.00	0.7	\$665.00								
11/22/2023	David Marks	6 teleconferences with H. Fleming regarding family witness interviews and status [1.50]	\$950.00	1.5	\$1,425.00								
11/22/2023	David Marks	Receive and review email from K. Ellis witness who signed "happy camper" declaration for Sunrise, now recanting [.10]	\$950.00	0.1	\$95.00								
11/22/2023	David Marks	Receive, review, and update preliminary witness interview of Bonita family witness from H. Fleming [.20]	\$950.00	0.2	\$190.00								
11/22/2023	David Marks	Receive and review email from K. Ellis with attachment containing completed initial witness questionnaire for Sterling Canyon and Palo Alto family witnesses [.80]	\$950.00	0.8	\$760.00								
11/22/2023	David Marks	Receive and review email from K. Ellis regarding status of Hellenhi journal/notebook and Playa Vista family witness's private caregiver phone number - possible witness [.10]	\$950.00	0.1	\$95.00								
11/22/2023	David Marks	Prep for call with Playa Vista family witness regarding observations and private caregiver he hired. Call to son - has little 1st hand info - need to obtain name/contact info for caregiver [1.80]	\$950.00	1.8	\$1,710.00								
11/22/2023	David Marks	Receive and review email from H. Fleming regarding Bonita family witness and the Bonita family witness's private care sitter for this resident (hired by family). The Bonita family witness's private care sitter is an outstanding witness. She knows another private sitter at Sunrise [.6]	\$950.00	0.6	\$570.00								
11/22/2023	David Marks	Teleconference with H. Fleming to discuss [.2]	\$950.00	0.2	\$190.00								
11/22/2023	Sterling Meachen	Using the jury instructions created a set a varying tables and graphics outlining what they must answer, highlighting key section for emphasis	\$225.00	5.9	\$1,327.50								
11/23/2023	Sterling Meachen	Created class member highlights – showcasing a map of what facility they attended, their dates of residents and POA if relevant	\$225.00	6.6	\$1,485.00	6.6	\$1,485.00						
11/24/2023	David Marks	Receive and review email from K. Ellis with attachment containing initial completed interview questionnaire for Westlake Village family witness [.40]	\$950.00	0.4	\$380.00								
11/24/2023	Sterling Meachen	Received first batch of witness testimony videos taken by loved ones in California. Began reviewing the videos themselves and using Adobe Premiere to get transcript to assist with attorney edits.	\$225.00	5.5	\$1,237.50								
11/27/2023	David Marks	Teleconferences with H. Fleming regarding status of family witness project [.30]	\$950.00	0.3	\$285.00								
11/27/2023	David Marks	Email to K. Ellis regarding contacting Monterey family witness about long waits for call light response [.10]	\$950.00	0.1	\$95.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
11/27/2023	David Marks	Trial preparation notebook: Research CA class action, jury instructions and supporting legal authority. Highlight key wording 3.60	\$950.00	3.6	\$3,420.00								
11/27/2023	David Marks	Email to/from Attorney Healey regarding estimated cost of family witness video project. Authorization to proceed with hiring videographer/court reporter approved .20	\$950.00	0.2	\$190.00								
11/27/2023	Sterling Meachen	Began working on a spreadsheet using Excel to outline former employee witness from our witness set, detailing their job title, facility and contact information	\$225.00	5.9	\$1,327.50								
11/28/2023	David Marks	Receive and review updated family witness spreadsheet from S. Zvonek .10	\$950.00	0.1	\$95.00								
11/28/2023	David Marks	Email to team regarding plan to obtain short family witness videos for mediation of highest rated witness or private sitters .20	\$950.00	0.2	\$190.00								
11/28/2023	David Marks	2 teleconferences with H. Fleming regarding upcoming witness Zoom call interviews .30	\$950.00	0.3	\$285.00								
11/28/2023	David Marks	Prep for call to family witness Sunrise Sterling family witnesses for pre-video interview 1.90	\$950.00	1.9	\$1,805.00								
11/28/2023	David Marks	Trial prep notebook: continue legal research for CA class action jury instructions/legal authority and highlight keywording 3.60	\$950.00	3.6	\$3,420.00								
11/28/2023	David Marks	Receive and review email from K. Ellis with attachment containing Bonita family witness's handwritten journal regarding Sunrise observations .50	\$950.00	0.5	\$475.00								
11/28/2023	David Marks	Meet with S. Meachen regarding 21 jury instruction slides for mediation with key wording in red font .30	\$950.00	0.3	\$285.00								
11/28/2023	David Marks	Receive and review 21 jury instructions and slides for mediation. Added to trial notebook .20	\$950.00	0.2	\$190.00								
11/28/2023	Sterling Meachen	Consulting with Attorney Marks began our 'Jury Instruction Section' of our presentation – which outlined the proof required for a class action and going into the definition of what a Class Action is 5.9	\$225.00	5.9	\$1,327.50								
11/28/2023	Sterling Meachen	Meet with Marks on update to jury instruction slides .3	\$225.00	0.3	\$67.50								
11/28/2023	Jim Thornton	Emails from David Marks related to upcoming meeting .1	\$500.00	0.1	\$50.00								
11/29/2023	Sterling Meachen	Created slides and emphasizing key section of records that go into detail regarding the ALF Requirements, including under California law	\$225.00	6.6	\$1,485.00			6.6	\$1,485.00				
11/30/2023	Jacques Balette	Review Care Level Services and Assessment Information, draft witness outlines, and key video questions for family members in preparation of video witness project	\$750.00	2.8	\$2,100.00								
11/30/2023	Jacques Balette	Amend outlines, update questions, identify focus areas for upcoming witness interview project	\$750.00	1.2	\$900.00								
11/30/2023	Jacques Balette	Review investigation file .2	\$750.00	0.2	\$150.00								
11/30/2023	Jacques Balette	Interview daughter of loved one at Sterling Canyon to determine personal knowledge of staffing, admissions, and willingness to provide a videoed witness statement .4	\$750.00	0.4	\$300.00								
11/30/2023	Jacques Balette	Prepare tailored outline for daughter with personal knowledge of staffing at Sterling Canyon in 2018 to 2020	\$750.00	0.4	\$300.00								
11/30/2023	Jacques Balette	Review investigation File .2	\$750.00	0.2	\$150.00								
11/30/2023	Jacques Balette	Interview private sitter for resident at Sunrise of Bonita to determine personal knowledge of staffing, admissions, and willingness to provide a videoed witness statement .3	\$750.00	0.3	\$225.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
11/30/2023	Jacques Balette	Prepare tailored outline for private sitter with personal knowledge of staffing at Sunrise of Bonita 2016 to 2018	\$750.00	0.3	\$225.00								
11/30/2023	Jacques Balette	Review investigation file [.2]	\$750.00	0.2	\$150.00								
11/30/2023	Jacques Balette	Interview daughter whose mother resided at Sunrise of Bonita to determine personal knowledge of staffing, admissions, and willingness to provide a videoed witness statement [.5]	\$750.00	0.5	\$375.00								
11/30/2023	Jacques Balette	Prepare tailored outline for daughter with personal knowledge of staffing at Sunrise of Bonita 2018 to 2021	\$750.00	0.4	\$300.00								
11/30/2023	David Marks	Receive and review from Attorney Healey and Attorney Umpierre notes/memos regarding Tiffany Nobbbee interview (conducted with Sunrise) regarding CLM process [.30]	\$950.00	0.3	\$285.00								
11/30/2023	Sterling Meachen	Created slides regarding the California's Consumer Legal Remedies Act (CLRA) showcasing Defendants violation of same [6.4]	\$225.00	6.4	\$1,440.00	6.4	\$1,440.00						
11/30/2023	Jim Thornton	Emails from Chris Healey regarding CLM inspection and notes [.3]	\$500.00	0.3	\$150.00								
12/1/2023	Jacques Balette	Conduct video witness statement of daughter whose mother resided at Sterling Canyon [.4]	\$750.00	0.4	\$300.00								
12/1/2023	Jacques Balette	Conduct video witness statement of private sitter for resident at Sunrise of Bonita [.3]	\$750.00	0.3	\$225.00								
12/1/2023	Jacques Balette	Conduct video witness statement of daughter whose mother was a resident at Sunrise of Bonita between 2018 - 2021 [.5]	\$750.00	0.5	\$375.00								
12/1/2023	Jacques Balette	Review documents produced by daughter whose mother resided at Sunrise of Bonita including, email and multiple journal entries [1.7]	\$750.00	1.7	\$1,275.00								
12/1/2023	Jacques Balette	Review investigation file [.2]	\$750.00	0.2	\$150.00								
12/1/2023	Jacques Balette	Interview private sitter for a different resident at Sunrise of Bonita to determine personal knowledge of staffing, admissions, and willingness to provide a videoed witness statement [.4]	\$750.00	0.4	\$300.00								
12/1/2023	Jacques Balette	Prepare tailored outline for second private sitter with personal knowledge of staffing at Sunrise of Bonita from 2019 to 2021 [.3]	\$750.00	0.3	\$225.00								
12/1/2023	David Marks	Continue edit of S. Meachen jury instruction slides/keywords [.30]	\$950.00	0.3	\$285.00								
12/1/2023	Sterling Meachen	Began preparing for the meeting with Attorney Marks& co counsel by taking transcript edits of witness video and complete video clips using Adobe Premiere [5.6]	\$225.00	5.6	\$1,260.00								
12/1/2023	Jim Thornton	Email from Chris Healey with draft mediation brief [.1]	\$500.00	0.1	\$50.00								
12/1/2023	Jim Thornton	Review of draft mediation brief [.4]	\$500.00	0.4	\$200.00								
12/2/2023	Jacques Balette	Conduct video witness statement of another private sitter for resident at Sunrise of Bonita [.3]	\$750.00	0.3	\$225.00								
12/2/2023	Jacques Balette	Follow-up T/C with both witnesses from Sunrise of Bonita to discuss statement, search for documentation evidencing complaints, search for journals, etc. [.5]	\$750.00	0.5	\$375.00								
12/2/2023	David Marks	Meet with Attorney Balette and S. Meachen regarding transcribing video interviews of family witness/private sitters for purposes of editing videos for mediation [.20]	\$950.00	0.2	\$190.00								
12/2/2023	David Marks	Receive and review from Attorney Healey regarding settlement update [.10]	\$950.00	0.1	\$95.00								
12/2/2023	David Marks	Conference with H. Fleming regarding progress/plan re: family witness interview [.20]	\$950.00	0.2	\$190.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/2/2023	Sterling Meachen	Meet with Marks and Balette on witness videos .2	\$225.00	0.2		\$45.00								
12/3/2023	Jacques Balette	Prepare summary of notable points from videoed witness statements to be used at trial 2.7	\$750.00	2.7		\$2,025.00								
12/3/2023	David Marks	Receive and review S. Meachen update jury instruction slides .20	\$950.00	0.2		\$190.00								
12/3/2023	Jim Thornton	Received and reviewed proposed jury instruction slides from David Marks and Sterling Meachen .3	\$500.00	0.3		\$150.00								
12/3/2023	Jim Thornton	Review of trial proof matrix .8	\$500.00	0.8		\$400.00								
12/4/2023	Jacques Balette	Meet with Attorney Marks re: video edits	\$750.00	0.7		\$525.00								
12/4/2023	Jacques Balette	Review, summarize and provide page/line edits to video transcript of daughter whose mother resided at Sterling Canyon	\$750.00	0.5		\$375.00								
12/4/2023	Jacques Balette	Review, summarize, and provide page/line edits to video transcript of private sitter with personal knowledge of staffing in 2016 to 2018	\$750.00	0.5		\$375.00								
12/4/2023	Jacques Balette	Watch video edits, make further edits, and grade the overall strength of testimony	\$750.00	1		\$750.00								
12/4/2023	Jacques Balette	Watch completed edits and coordinate with team on usage	\$750.00	0.8		\$600.00								
12/4/2023	Jacques Balette	Review investigation file .2	\$750.00	0.2		\$150.00								
12/4/2023	Jacques Balette	Interview daughter whose mother resided at Sunrise of Palo Alto to determine personal knowledge of staffing, admissions, and willingness to provide a videoed witness statement .4	\$750.00	0.4		\$300.00								
12/4/2023	Jacques Balette	Prepare tailored outline for daughter with personal knowledge of staffing at Sunrise of Palo Alto 2015 to 2018 .4	\$750.00	0.4		\$300.00								
12/4/2023	Brent Moss	Review email from Atty. DTM RE: Sunrise Texas meeting .1	\$750.00	0.1		\$75.00								
12/4/2023	Brent Moss	Review email from Atty. DTM RE: Sunrise Texas Meeting .2	\$750.00	0.2		\$150.00								
12/4/2023	David Marks	Meet with Attorney Balette regarding videos of family witnesses/private care sitters (2 separate Bonita family witnesses' private care sitters, Bonita family witness, and a Studio City family witness) 1.10	\$950.00	1.1		\$1,045.00								
12/4/2023	David Marks	Continue work on trial prep notebook - key jury instructions and key trial proof 8.20	\$950.00	8.2		\$7,790.00		8.2	\$7,790.00					
12/4/2023	David Marks	Receive and review S. Meachen slides of key jury instructions and Sunrise proof of representation .30	\$950.00	0.3		\$285.00								
12/4/2023	David Marks	Receive, review, and begin editing the transcribed video interviews of family/hired private sitters 3.90	\$950.00	3.9		\$3,705.00								
12/4/2023	David Marks	Meet and discuss with Attorney Balette the edits for video witnesses .70	\$950.00	0.7		\$665.00								
12/4/2023	David Marks	Receive and review Attorney Healey's email regarding potential order of trial witnesses and prove/evidence they bring .40	\$950.00	0.4		\$380.00								
12/4/2023	David Marks	Prep for Zoom/GoToMeeting call with team regarding trial of Sunrise care and upcoming Texas meeting .70	\$950.00	0.7		\$665.00								
12/4/2023	David Marks	Receive and review Attorney Balette's suggested video edits to Sunrise Bonita family witness caregiver's video interview. Integrate into final video cut .7	\$950.00	0.7		\$665.00								
12/4/2023	David Marks	Discuss final edit with S. Meachen .2	\$950.00	0.2		\$190.00								
12/4/2023	David Marks	Travel to trial prep meeting site (Fredricksburg) 4.10	\$950.00	4.1		\$3,895.00							4.1	3,895.00
12/4/2023	Sterling Meachen	Took key equipment, projector, projector display, extensions, tape and others from Marks Firm to meeting location and once arrived set up the meeting area using equipment for attorney arrival 4.4	\$225.00	4.4		\$990.00								
12/4/2023	Sterling Meachen	Meet with Marks, Balette, and Moss 4.0	\$225.00	4		\$900.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/4/2023	Jim Thornton	Travel to TX for meeting in preparation for trial and mediation 10	\$500.00	10	\$5,000.00		10	\$5,000.00				10.00	5,000.00
12/5/2023	Jacques Balette	Review, summarize and provide page/line edits to video transcript of daughter whose mother resided at Sunrise of Bonita	\$750.00	0.5	\$375.00								
12/5/2023	Jacques Balette	Review, summarize and provide page/line edits to video transcript of private sitter with client at Sunrise of Bonita	\$750.00	0.5	\$375.00								
12/5/2023	Jacques Balette	Watch video edits, make further edits, and grade the overall strength of witnesses' testimony	\$750.00	1	\$750.00								
12/5/2023	Jacques Balette	Watch completed edits and coordinate with team on usage	\$750.00	0.8	\$600.00								
12/5/2023	Jacques Balette	Conduct video witness statement of daughter whose mother was a resident at Sunrise of Palo Alto between 2015 - 2018	\$750.00	0.3	\$225.00								
12/5/2023	Jacques Balette	Follow-up T/C with witness from Sunrise of Palo Alto to discuss statement, search for documentation evidencing complaints, search for journals, etc.	\$750.00	0.3	\$225.00								
12/5/2023	Brent Moss	Review email from Inv. HF RE: Sunrise service Levels	\$750.00	0.10	\$75.00								
12/5/2023	Brent Moss	Review email from Inv. HF RE: Sunrise service Levels	\$750.00	0.10	\$75.00								
12/5/2023	Brent Moss	Review email from Inv. HF RE: Sunrise Fresno family witness	\$750.00	0.10	\$75.00								
12/5/2023	Brent Moss	Review email from Inv. HF RE: Sunrise/Sunrise Belmont family witness statement	\$750.00	0.10	\$75.00								
12/5/2023	Brent Moss	Review email from Inv. HF RE: Sunrise Belmont family witness letter	\$750.00	0.20	\$150.00								
12/5/2023	Brent Moss	Travel to Sunrise Texas meeting Re: meeting with legal team	\$750.00	4.00	\$3,000.00							4	3,000.00
12/5/2023	Brent Moss	Sunrise Texas meeting with legal team	\$750.00	10.30	\$7,725.00	10.3	\$7,725.00						
12/5/2023	Brent Moss	Review investigation file and interview notes	\$750.00	0.60	\$450.00								
12/5/2023	Brent Moss	Conference with inv. Harry Fleming to discuss witness strengths & weaknesses	\$750.00	0.2	\$150.00								
12/5/2023	Brent Moss	Arrange time for witness interview	\$750.00	0.1	\$75.00								
12/5/2023	Brent Moss	Review investigation file and interview notes	\$750.00	0.20	\$150.00								
12/5/2023	Brent Moss	Conference with inv. Harry Fleming to discuss witness strengths & weaknesses	\$750.00	0.3	\$225.00								
12/5/2023	Brent Moss	Meeting with DTM re: witness interview	\$750.00	0.2	\$150.00								
12/5/2023	Brent Moss	Arrange time for witness interview	\$750.00	0.1	\$75.00								
12/5/2023	David Marks	Receive and review email from JAMS regarding Judge Welsh .10	\$950.00	0.1	\$95.00								
12/5/2023	David Marks	Trial prep meeting - set up conference area. Meet with Houston team and Attorney Thornton regarding family witness video project and jury instructions/key verdict questions. Refine meeting agenda and issues for discussion 7.30	\$950.00	7.3	\$6,935.00		7.3	\$6,935.00					
12/5/2023	David Marks	Receive and review Attorney Balette's initial video edits to video of family witnesses. Integrate into final video cut .6	\$950.00	0.6	\$570.00								
12/5/2023	David Marks	Discuss final edit with S. Meachen .2	\$950.00	0.2	\$190.00								
12/5/2023	David Marks	Meet with S. Meachen regarding integrating family witness Sunrise Belmont family witness letter to corporate Sunrise into video of witness .20	\$950.00	0.2	\$190.00								
12/5/2023	David Marks	CA team arrives. Meeting to discuss initial video statements of witnesses and key points/edits for mediation 1.00	\$950.00	1	\$950.00				1	950			
12/5/2023	Sterling Meachen	Continue attorney edits to witness videos, as more videos were received would pass off transcript to Thornton for video cut edits 7.8	\$225.00	7.8	\$1,755.00		7.8	\$1,755.00					
12/5/2023	Sterling Meachen	Meet with Marks, Balette, and Moss on assignments .3	\$225.00	0.3	\$67.50								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/5/2023	Jim Thornton	Meeting with team in preparation for trial and mediation, including work on witness statements and videos, timeline, and jury instructions 10	\$500.00	10	\$5,000.00	10	\$5,000.00	10	5000				
12/5/2023	Jim Thornton	Received and reviewed email from Dale Schroyer regarding timecard driven model project .2	\$500.00	0.2	\$100.00								
12/6/2023	Jacques Balette	Trial prep meeting to discuss witnesses, proof, staffing evidence, jury instructions, etc.	\$750.00	6.5	\$4,875.00	6.5	\$4,875.00						
12/6/2023	Jacques Balette	Review, summarize and provide page/line edits to video transcript of daughter with mother at Sunrise of Palo Alto	\$750.00	0.5	\$375.00								
12/6/2023	Jacques Balette	Watch video edits, make further edits, and grade the overall strength of witness' testimony	\$750.00	0.4	\$300.00								
12/6/2023	Jacques Balette	Watch completed edits and coordinate with team on usage	\$750.00	0.3	\$225.00								
12/6/2023	Brent Moss	Review email from Atty. JT RE Megan Yarnall Re: Kennedy Declaration	\$750.00	0.10	\$75.00								
12/6/2023	Brent Moss	Review email from Atty. JT Re: Sunrise injunction information	\$750.00	0.10	\$75.00								
12/6/2023	Brent Moss	Review email from Paralegal Megan Yarnall RE: Audrey Heredia v. Sunrise Senior Living	\$750.00	0.30	\$225.00								
12/6/2023	Brent Moss	Sunrise Texas meeting with legal team	\$750.00	10.10	\$7,575.00	10.1	\$7,575.00						
12/6/2023	Brent Moss	Meeting with Atty. DTM re: witness interview	\$750.00	0.10	\$75.00								
12/6/2023	Brent Moss	Conduct video witness statement of Sunrise Belmont family witness	\$750.00	0.80	\$600.00								
12/6/2023	Brent Moss	Review investigation file and interview notes	\$750.00	0.20	\$150.00								
12/6/2023	Brent Moss	Conference with inv. Harry Fleming to discuss witness strengths & weaknesses	\$750.00	0.2	\$150.00								
12/6/2023	Brent Moss	Meeting with DTM re: witness interview	\$750.00	0.2	\$150.00								
12/6/2023	Brent Moss	Arrange time for witness interview	\$750.00	0.1	\$75.00								
12/6/2023	Brent Moss	Meeting with Atty. DTM re: witness interview	\$750.00	0.10	\$75.00								
12/6/2023	Brent Moss	Conduct video witness statement of Sunrise Fresno family witness	\$750.00	0.10	\$75.00								
12/6/2023	David Marks	Trial prep meeting: CA team attendees: Attorney Healey, Attorney Thamer, Attorney Yarnall. Houston team attendees: Attorney Marks, Attorney Balette, Attorney Moss, Attorney Thornton, and S. Meachen. Discuss trial witnesses and proof: Family witnesses, employee witnesses, private sitters, staffing evidence, census, jury instructions, key trial issues, and mediation preparation. Also discuss key event timeline, mediation update, and trial/mediation brief 6.50	\$950.00	6.5	\$6,175.00	6.5	\$6,175.00	6.5	6175				
12/6/2023	David Marks	Meeting with Houston team regarding family witness video project for mediation and trial 3.10	\$950.00	3.1	\$2,945.00								
12/6/2023	Jim Thornton	Meeting with team in preparation for trial and mediation, including work on witness statements and videos, timeline, and jury instructions 10	\$500.00	10	\$5,000.00	10	\$5,000.00	10	5000				
12/6/2023	Sterling Meachen	Played video testimony clips that were cut using Premiere to showcase impact to co counsel 1.5	\$225.00	1.5	\$337.50								
12/6/2023	Sterling Meachen	Took notes of feedback and what to adjust for future clip .5	\$225.00	0.5	\$112.50								
12/6/2023	Sterling Meachen	Made version of videos that removed questions by attorney and only played answers by witness 6.2	\$225.00	6.2	\$1,395.00	6.2	\$1,395.00						
12/6/2023	Sterling Meachen	Address trial needs with meetings with attorneys 1.0	\$225.00	1	\$225.00								
12/7/2023	Jacques Balette	Continuation trial prep with Houston team.	\$750.00	6	\$4,500.00	6	\$4,500.00						
12/7/2023	Brent Moss	Review email from Atty. JT Re: Sunrise Assessment data	\$750.00	0.10	\$75.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/7/2023	Brent Moss	Review Statement from Megan Yarnall Re: Sunrise Family Witnesses	\$750.00	1.00	\$750.00								
12/7/2023	Brent Moss	Review Trial Brief & Attachment from Atty. JT	\$750.00	0.30	\$225.00								
12/7/2023	Brent Moss	Review email from Inv. HF Re: Conference of scheduling Sunrise La Costa family witness	\$750.00	0.10	\$75.00								
12/7/2023	Brent Moss	Review email of Inv. HF re: Second Interview & video of Sunrise Hermosa Beach family witness	\$750.00	0.10	\$75.00								
12/7/2023	Brent Moss	Review email of Atty. JGB re: Sunrise La Costa family witness and attendance	\$750.00	0.10	\$75.00								
12/7/2023	Brent Moss	Review email of Inv. HF re: Sunrise Studio City family witness preparation	\$750.00	0.10	\$75.00								
12/7/2023	Brent Moss	Sunrise Texas meeting with legal team [9.3]	\$750.00	9.30	\$6,975.00	9.3	\$6,975.00						
12/7/2023	Brent Moss	Meeting with Atty. DTM re: witness interview	\$750.00	0.10	\$75.00								
12/7/2023	Brent Moss	Conduct video witness statement of Sunrise Beverly Hills family witness	\$750.00	0.20	\$150.00								
12/7/2023	Brent Moss	Review investigation file and interview notes [.2]	\$750.00	0.20	\$150.00								
12/7/2023	Brent Moss	Conference with inv. Harry Fleming to discuss witness strengths & weaknesses [.2]	\$750.00	0.2	\$150.00								
12/7/2023	Brent Moss	Meeting with DTM re: witness interview [.3]	\$750.00	0.3	\$225.00								
12/7/2023	Brent Moss	Arrange time for witness interview [.1]	\$750.00	0.1	\$75.00								
12/7/2023	Brent Moss	Review investigation file and interview notes [.3]	\$750.00	0.30	\$225.00								
12/7/2023	Brent Moss	Conference with inv. Harry Fleming to discuss witness strengths & weaknesses [.2]	\$750.00	0.2	\$150.00								
12/7/2023	Brent Moss	Meeting with DTM re: witness interview [.2]	\$750.00	0.2	\$150.00								
12/7/2023	Brent Moss	Arrange time for witness interview [.1]	\$750.00	0.1	\$75.00								
12/7/2023	David Marks	Trial prep meeting: CA team attendees: Attorney Healey, Attorney Thamer, Attorney Yarnall. Houston team attendees: Attorney Marks, Attorney Balette, Attorney Moss, Attorney Thornton, and S. Meachen. Discuss trial witnesses and proof: Family witnesses, employee witnesses, private sitters, staffing evidence, census, jury instructions, key trial issues, and mediation preparation. Also discuss key event timeline, mediation update, and trial/mediation brief. Also discuss statutory damage verdict question and jury instructions[6.00]	\$950.00	6	\$5,700.00	6	\$5,700.00						
12/7/2023	David Marks	Meet with family witness team regarding schedule, assignments, and revising to interview template [1.10]	\$950.00	1.1	\$1,045.00								
12/7/2023	Sterling Meachen	Present throughout co counsel meeting to provide visual note taking on the projector [4.9]	\$225.00	4.9	\$1,102.50								
12/7/2023	Sterling Meachen	Created a timeline outline regarding the use of staffing models at Sunrise facilities [1.5]	\$225.00	1.5	\$337.50								
12/7/2023	Sterling Meachen	Address trial preparation with attorneys [.5]	\$225.00	0.5	\$112.50								
12/7/2023	Jim Thornton	Meeting with team in preparation for trial and mediation, including work on witness statements and videos, timeline, and jury instructions, work on emails with Brian Umpierre related to sample assessment data produced [8.3]	\$500.00	8.3	\$4,150.00	8.3	\$4,150.00						
12/7/2023	Jim Thornton	Began return travel [3]	\$500.00	3	\$1,500.00							3	1,500.00
12/8/2023	Jacques Balette	Review investigation file [.2]	\$750.00	0.2	\$150.00								
12/8/2023	Jacques Balette	Interview daughter whose mother resided at Sunrise of Carmichael to determine personal knowledge of staffing, admissions, and willingness to provided witness statement, etc. [.7]	\$750.00	0.7	\$525.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/8/2023	Jacques Balette	Prepare tailored outline for daughter with personal knowledge of staffing at Sunrise of Carmichael 2017 to 2018	\$750.00	0.5		\$375.00								
12/8/2023	Brent Moss	Review email from Inv. HF Re: scheduling video and preparation with Inv. HF	\$750.00	0.10		\$75.00								
12/8/2023	Brent Moss	Review email from Atty. Healey re: Sunrise background documents	\$750.00	0.10		\$75.00								
12/8/2023	Brent Moss	Sunrise Texas meeting with legal team	\$750.00	10.30		\$7,725.00	10.3	\$7,725.00						
12/8/2023	Brent Moss	Travel from Sunrise Texas meeting Re: Meeting with legal team	\$750.00	4.00		\$3,000.00							4	3,000.00
12/8/2023	Brent Moss	Meeting with Atty. DTM re: witness interview	\$750.00	0.10		\$75.00								
12/8/2023	Brent Moss	Conduct video witness statement of Sunrise Studio City family witness	\$750.00	0.50		\$375.00								
12/8/2023	Brent Moss	Meeting with Atty. DTM re: witness interview	\$750.00	0.10		\$75.00								
12/8/2023	Brent Moss	Conduct video witness statement of Sunrise Fullerton family witness	\$750.00	1.00		\$750.00								
12/8/2023	David Marks	Receive and review updated timeline of Sunrise key events and jury instructions, verdict slides. Additional edits [.90]	\$950.00	0.9		\$855.00								
12/8/2023	David Marks	Receive and review H. Fleming prep schedule for upcoming video witness [.10]	\$950.00	0.1		\$95.00								
12/8/2023	David Marks	Travel back to Houston [4.00]	\$950.00	4		\$3,800.00							4	3,800.00
12/8/2023	Sterling Meachen	Broke down co counsel meeting room and packed up all the equipment into Truck [4.0]	\$225.00	4		\$900.00								
12/8/2023	Sterling Meachen	Return trip to Marks firm where equipment was returned	\$225.00	4.2		\$945.00							4.2	945
12/8/2023	Jim Thornton	Return travel from meeting [4.0]	\$500.00	4		\$2,000.00							4	2,000.00
12/8/2023	Jim Thornton	Received and reviewed sets of slides, jury instructions, and timeline from Sterling Meachen [1.2]	\$500.00	1.2		\$600.00								
12/9/2023	David Marks	Family Witness Project: Received and reviewed K. Ellis emails with attachments containing new prelim interview with family witnesses from Hermosa Beach, Studio City, Seal Beach, and Tustin). Assign to H. Fleming for follow up [1.40]	\$950.00	1.4		\$1,330.00								
12/9/2023	David Marks	Continue edit of trial/mediation brief [3.40]	\$950.00	3.4		\$3,230.00								
12/9/2023	Jim Thornton	Emails with Blake Peters regarding names and resident IDs [.4]	\$500.00	0.4		\$200.00								
12/9/2023	Jim Thornton	W/on spoliation case issues and sent to David Marks [.8]	\$500.00	0.8		\$400.00								
12/10/2023	Brent Moss	Review 2 emails from Inv. HF Re: Sunrise Fullerton family witness	\$750.00	0.10		\$75.00								
12/10/2023	Brent Moss	Review email from Inv. HF Re: Sunrise family members statements	\$750.00	0.10		\$75.00								
12/10/2023	Jim Thornton	Emails with Blake Peters regarding names and IDS of residents [.2]	\$500.00	0.2		\$100.00								
12/11/2023	Jacques Balette	Conduct video witness statement of daughter whose mother resided at Sunrise of Carmichael	\$750.00	0.5		\$375.00								
12/11/2023	Jacques Balette	Follow-up T/C with witness from Sunrise of Carmichael to discuss statement, search for documentation evidencing complaints, search for journals, etc.	\$750.00	0.4		\$300.00								
12/11/2023	Brent Moss	Review testimony and video spreadsheets with Sterling Meachen	\$750.00	0.20		\$150.00								
12/11/2023	Brent Moss	Review email from Inv. HF Re: Sunrise Class Action re: Witness Statements	\$750.00	0.10		\$75.00								
12/11/2023	David Marks	Receive and review Attorney K. Stebner/Attorney Healey emails regarding Sunrise pre-mediation settlement offer [.10]	\$950.00	0.1		\$95.00								
12/11/2023	David Marks	Receive and review H. Fleming schedule for family witness prep for video statement [.10]	\$950.00	0.1		\$95.00								

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						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/11/2023	David Marks	GoToMeeting with Attorney Thornton regarding analysis of "happy camper" declarations using other discovery produced by Sunrise (billing history/dates of service) .50	\$950.00	0.5	\$475.00								
12/11/2023	David Marks	Receive and review Sunrise billing history analysis from B. Peters regarding services evals and dates of service .20	\$950.00	0.2	\$190.00								
12/11/2023	David Marks	Teleconference with H. Fleming regarding status/schedule of family witness interviews .20	\$950.00	0.2	\$190.00								
12/11/2023	David Marks	Med model simulation project: review plan to update staffing methodology to use staff punch detail records versus staff hour PPD (based on punch detail) and D. Schroyer question regarding project. Compare results of the 2 models based on Hrs PPD versus punch detail start and end times 1.1	\$950.00	1.1	\$1,045.00								
12/11/2023	David Marks	Respond to K. Kesler/D. Schroyer questions regarding project (project delivery date mid January) .3	\$950.00	0.3	\$285.00								
12/11/2023	David Marks	Receive and review Attorney Thornton's email regarding updated simulation model .10	\$950.00	0.1	\$95.00								
12/11/2023	David Marks	Receive and review D. Schroyer email regarding updated simulation .10	\$950.00	0.1	\$95.00								
12/11/2023	David Marks	Receive and review S. Meachen's spreadsheet on editing. Family witness videos for mediation .10	\$950.00	0.1	\$95.00								
12/11/2023	David Marks	Meeting with S. Meachen regarding plan for mediation edits 1.00	\$950.00	1	\$950.00								
12/11/2023	David Marks	Work on mediation brief integrating key evidence and key jury instructions 3.80	\$950.00	3.8	\$3,610.00								
12/11/2023	David Marks	Meet/discuss questions regarding billing history analysis with B. Peters .10	\$950.00	0.1	\$95.00								
12/11/2023	Sterling Meachen	Meet with Marks on mediation edits	\$225.00	0.1	\$22.50								
12/11/2023	Jim Thornton	Emails with Dale Schroyer and David Marks regarding timecard driven model and data inputs .6	\$500.00	0.6	\$300.00								
12/11/2023	Jim Thornton	Work with Blake Peters about pulling timecard data for use in timecard driven model project .3	\$500.00	0.3	\$150.00								
12/11/2023	Jim Thornton	GoToMeeting with David Marks regarding happy camper issues .5	\$500.00	0.5	\$250.00								
12/11/2023	Jim Thornton	Emails with Blake Peters regarding billing service history questions .2	\$500.00	0.2	\$100.00								
12/11/2023	Jim Thornton	W/on locating all version of the impossible slide from TCB and sent same to Chris Healey 2.7	\$500.00	2.7	\$1,350.00								
12/12/2023	Jacques Balette	Review, summarize and provide page/line edits to video transcript of daughter with mother at Sunrise of Carmichael 2017 - 2018	\$750.00	0.5	\$375.00								
12/12/2023	Jacques Balette	Watch video edits, make further edits, and grade the overall strength of witness' testimony	\$750.00	0.4	\$300.00								
12/12/2023	Jacques Balette	Watch completed edits and coordinate with team on usage	\$750.00	0.3	\$225.00								
12/12/2023	Jacques Balette	Review investigation file .2	\$750.00	0.2	\$150.00								
12/12/2023	Jacques Balette	Interview daughter whose mother resided at Sunrise of Fullerton to determine personal knowledge of staffing, admissions, and willingness to provided witness statement, etc. .8	\$750.00	0.8	\$600.00								
12/12/2023	Jacques Balette	Prepare tailored outline for daughter with personal knowledge of staffing at Sunrise of Fullerton 2015	\$750.00	0.5	\$375.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/12/2023	Jacques Balette	Conduct video witness statement of daughter whose mother resided at Sunrise of Fullerton	\$750.00	0.5		\$375.00								
12/12/2023	Jacques Balette	Follow-up T/C with witness from Sunrise of Fullerton to discuss statement, search for documentation evidencing complaints, search for journals, etc.	\$750.00	0.4		\$300.00								
12/12/2023	Jacques Balette	Review investigation file [.2]	\$750.00	0.2		\$150.00								
12/12/2023	Jacques Balette	Interview son and resident who resided at Sunrise of Mission Viejo to determine personal knowledge of staffing, admissions, and willingness to provided witness statement, etc. 1.1	\$750.00	1.1		\$825.00								
12/12/2023	Jacques Balette	Prepare tailored outlines for son and resident with personal knowledge of staffing at Sunrise of Mission Viejo 2017-2018	\$750.00	0.6		\$450.00								
12/12/2023	Jacques Balette	Conduct video witness statement of both son and resident whose resided at Sunrise of Mission Viejo	\$750.00	0.8		\$600.00								
12/12/2023	Jacques Balette	Follow-up T/C with witnesses from Sunrise of Mission Viejo to discuss statement, search for documentation evidencing complaints, search for journals, etc.	\$750.00	0.4		\$300.00								
12/12/2023	Brent Moss	Review email from Inv. HF Re: Sunrise Hermosa Beach family witness [.1]	\$750.00	0.10		\$75.00								
12/12/2023	Brent Moss	Review investigation file and interview notes [.1]	\$750.00	0.10		\$75.00								
12/12/2023	Brent Moss	Conference with Inv. Harry Fleming to discuss witness strengths & weaknesses [.2]	\$750.00	0.2		\$150.00								
12/12/2023	Brent Moss	Meeting with DTM re: witness interview [.2]	\$750.00	0.2		\$150.00								
12/12/2023	Brent Moss	Arrange time for witness interview [.1]	\$750.00	0.1		\$75.00								
12/12/2023	David Marks	Continue work on mediation brief 3.10	\$950.00	3.1		\$2,945.00								
12/12/2023	David Marks	Receive and review Attorney J. Thornton's edits to mediation brief - fact section, Sunrise care staffing model. CM labor targets vs TCB model, Ann Lacey findings themes based on staffing interviews. Integrate same [.50]	\$950.00	0.5		\$475.00								
12/12/2023	David Marks	Research/review CLRA key elements (reliance) and likely to deceive reasonable consumer [.80]	\$950.00	0.8		\$760.00								
12/12/2023	David Marks	Teleconference with Attorney Healey regarding CLRA claim - reliance element and jury instruction [.20]	\$950.00	0.2		\$190.00								
12/12/2023	David Marks	Continue work on mediation brief, Fact section E [.8]	\$950.00	0.8		\$760.00								
12/12/2023	David Marks	Discuss with Attorney Thornton with specific source documents [.3]	\$950.00	0.3		\$285.00								
12/12/2023	David Marks	Revise jury instruction slide for CLRA (fall-back instruction if court rejects our first proposed CLRA instruction) [.10]	\$950.00	0.1		\$95.00								
12/12/2023	David Marks	Discuss with S. Meachen [.10]	\$950.00	0.1		\$95.00								
12/12/2023	Sterling Meachen	Created a Witness Video Summary Excel that outlined each individual clip, the facility, unit, witness name, start and end page from the official transcript and clip summary 5.8	\$225.00	5.8		\$1,305.00								
12/12/2023	Sterling Meachen	Meet with Marks on back up instructions [.3]	\$225.00	0.3		\$67.50								
12/12/2023	Jim Thornton	Review of mediation brief [.2]	\$500.00	0.2		\$100.00								
12/12/2023	Jim Thornton	Online meeting with Dale Schroyer and ProModel regarding timecard driven model [.3]	\$500.00	0.3		\$150.00								
12/12/2023	Jim Thornton	Search for important TCB slides for David Marks and sent same to him [.7]	\$500.00	0.7		\$350.00								
12/13/2023	Jacques Balette	Review, summarize and provide page/line edits to video transcript of daughter with mother at Sunrise of Fullerton 2015	\$750.00	0.4		\$300.00								
12/13/2023	Jacques Balette	Watch video edits, make further edits, and grade the overall strength of witness' testimony	\$750.00	0.5		\$375.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/13/2023	Jacques Balette	Watch completed edits and coordinate with team on usage	\$750.00	0.5	\$375.00								
12/13/2023	Jacques Balette	Prepare summary of notable points from new videoed witness statements to be used at trial	\$750.00	2.5	\$1,875.00								
12/13/2023	Brent Moss	Meeting with Atty. DTM re: witness interview	\$750.00	0.20	\$150.00								
12/13/2023	Brent Moss	Conduct video witness statement of Sunrise Sterling Canyon family witness	\$750.00	0.50	\$375.00								
12/13/2023	David Marks	Receive and review D. Schroyer email regarding punch detail simulation project status [.20]	\$950.00	0.2	\$190.00								
12/13/2023	David Marks	Received and reviewed S. Meachen updated spreadsheets of transcribed video witnesses [.10]	\$950.00	0.1	\$95.00								
12/13/2023	David Marks	Receive and review Attorney Moss email regarding status of witness Sterling Canyon transcript of video interview [.10]	\$950.00	0.1	\$95.00								
12/13/2023	David Marks	Receive and review email from S. Meachen with transcripts of part of family videos and begin key video edits for mediation [9.60]	\$950.00	9.6	\$9,120.00	9.6	\$9,120.00						
12/13/2023	David Marks	Receive and review email from Attorney Healey regarding status of mediation brief [.10]	\$950.00	0.1	\$95.00								
12/13/2023	Sterling Meachen	Created a graphic using the CLRA Outline that illustrated the timeline of staffing models present at Sunrise	\$225.00	6.7	\$1,507.50	6.7	\$1,507.50						
12/13/2023	Jim Thornton	W/on new key fact section for mediation brief and sent to David Marks [2.4]	\$500.00	2.4	\$1,200.00								
12/13/2023	Jim Thornton	Received and reviewed timecard inputs format mockup from Dale Schroyer and sent to Blake Peters for review and comment and advised Dale Schroyer of status [.6]	\$500.00	0.6	\$300.00								
12/14/2023	Brent Moss	Review investigation file and interview notes [.1]	\$750.00	0.10	\$75.00								
12/14/2023	Brent Moss	Conference with inv. Harry Fleming to discuss witness strengths & weaknesses [.2]	\$750.00	0.2	\$150.00								
12/14/2023	Brent Moss	Meeting with DTM re: witness interview [.2]	\$750.00	0.2	\$150.00								
12/14/2023	Brent Moss	Arrange time for witness interview [.1]	\$750.00	0.1	\$75.00								
12/14/2023	David Marks	Receive and review email from Attorney Yarnall regarding analysis of 177 "happy camper" declaration from Sunrise [.30]	\$950.00	0.3	\$285.00								
12/14/2023	David Marks	Receive and review email from Attorney Yarnall regarding analysis/graph of COVID impact on staffing [.20]	\$950.00	0.2	\$190.00								
12/14/2023	David Marks	Receive and review email from D. Schroyer regarding status of MOST ALF model time timecard simulation [.10]	\$950.00	0.1	\$95.00								
12/14/2023	Sterling Meachen	Conferred with Attorney Moss regarding edits to new witness testimony by Giovanneti and cut clips using Premiere	\$225.00	6.5	\$1,462.50	6.5	\$1,462.50						
12/14/2023	Jim Thornton	Emails from Megan Yarnell regarding Happy Camper acuity analysis for non-class members and Covid timeline [.4]	\$500.00	0.4	\$200.00								
12/15/2023	Brent Moss	Review email from Sterling Meachen Re: Testimony of video spreadsheet	\$750.00	0.1	\$75.00								
12/15/2023	Brent Moss	Review email from Inv. HF Re: Sunrise/Sunrise Hermosa Beach family witness	\$750.00	0.1	\$75.00								
12/15/2023	Brent Moss	Meeting with Atty. DTM re: witness interview	\$750.00	0.2	\$150.00								
12/15/2023	Brent Moss	Conduct video witness statement of Sunrise Hermosa Beach family witness	\$750.00	0.5	\$375.00								
12/15/2023	Brent Moss	Review investigation file and interview notes [.1]	\$750.00	0.1	\$75.00								
12/15/2023	Brent Moss	Conference with inv. Harry Fleming to discuss witness strengths & weaknesses [.2]	\$750.00	0.2	\$150.00								
12/15/2023	Brent Moss	Meeting with DTM re: witness interview [.2]	\$750.00	0.2	\$150.00								
12/15/2023	Brent Moss	Arrange time for witness interview [.1]	\$750.00	0.1	\$75.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
12/15/2023	Jim Thornton	Received and reviewed mockup of timecard driven model and report from Dale Schroyer and responded to Dale Schroyer regarding questions about inputs [.6]	\$500.00	0.6	\$300.00								
12/15/2023	Jim Thornton	Received and reviewed updated mediation brief from Chris Healey [.3]	\$500.00	0.3	\$150.00								
12/15/2023	Sterling Meachen	Using the official witness transcripts created highlighted versions of where the edits were being taken place and distributed copies to the attorneys.	\$225.00	6.3	\$1,417.50	6.3	\$1,417.50						
12/16/2023	Brent Moss	Meeting with Atty. DTM re: witness interview	\$750.00	0.2	\$150.00								
12/16/2023	Brent Moss	Conduct video witness statement of Sunrise San Marino family witness	\$750.00	1.0	\$750.00								
12/17/2023	David Marks	Receive, review and begin editing/rotating Attorney Healey draft mediation brief (dated 12/15/2023) [1.40]	\$950.00	1.4	\$1,330.00								
12/17/2023	David Marks	Receive and review email from Attorney Yarnall regarding family who wrote letter complaining about care/staffing to Sunrise but who had settled claim with Sunrise. Settlement contains non-disclosure language [.10]	\$950.00	0.1	\$95.00								
12/17/2023	David Marks	Receive and review email from Attorney Yarnall attaching newly obtained complaints by many families to corporate Sunrise integrate into mediation presentation [.20]	\$950.00	0.2	\$190.00								
12/17/2023	David Marks	Receive and review: (1) email from Attorney Yarnall regarding email blast sent to class members regarding complaints they made to Sunrise regarding long wait times/staffing; and (2) a new is audio file obtained from family/resident describing wait times and lacks of care [.60]	\$950.00	0.6	\$570.00								
12/18/2023	Brent Moss	Review email from Atty. DTM Re: 5/15/21/Sunrise Sterling Canyon family witness	\$750.00	0.10	\$75.00								
12/18/2023	Brent Moss	Review email from Atty. DTM Re: written complaint request from Sunrise	\$750.00	0.10	\$75.00								
12/18/2023	Brent Moss	Review email from Inv. HF Re: Sunrise La Costa family witness	\$750.00	0.10	\$75.00								
12/18/2023	Brent Moss	Review email from Inv. HF Re: scheduling audio witness interviews of assorted family members	\$750.00	0.10	\$75.00								
12/18/2023	David Marks	Receive and review Attorney Moss emails of 12/15/2023 and 12/16/2023 regarding video witness interviews [.10]	\$950.00	0.1	\$95.00								
12/18/2023	David Marks	Receive and review S. Meachen updated Sunrise video spreadsheet, notating video and transcription available. Mediation edits in progress [.20]	\$950.00	0.2	\$190.00								
12/18/2023	David Marks	Continue video edits of family witness to use at mediation [5.30]	\$950.00	5.3	\$5,035.00								
12/18/2023	David Marks	Continue works on mediation brief [3.60]	\$950.00	3.6	\$3,420.00								
12/18/2023	David Marks	GoToMeeting with Attorney Thornton regarding edits/revisions to mediation brief. Integrate same into brief [1.10]	\$950.00	1.1	\$1,045.00								
12/18/2023	David Marks	Email to Attorney Healey regarding status to most recent mediation brief draft [.10]	\$950.00	0.1	\$95.00								
12/18/2023	Jim Thornton	GoToMeeting with Dale Schroyer, ProModel team and Blake Peters regarding timecard driven model and format of inputs needed [1.5]	\$500.00	1.5	\$750.00								
12/18/2023	Jim Thornton	GoToMeeting with David Marks working on mediation brief [1.1]	\$500.00	1.1	\$550.00								
12/18/2023	Sterling Meachen	Prepare spreadsheet of all video witnesses, content, time of video play, grade, etc.	\$225.00	1.8	\$405.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
12/19/2023	Brent Moss	Review email from Inv. HF Re: Sunrise Palo Alto family witness audio witness interview	\$750.00	0.10	\$75.00								
12/19/2023	Brent Moss	Review email from Inv. HF Re: other family member complaint requests against various Sunrise facilities	\$750.00	0.10	\$75.00								
12/19/2023	Brent Moss	Review email from Atty. DTM Re: Mediation brief edits	\$750.00	0.50	\$375.00								
12/19/2023	David Marks	GoToMeeting with Attorney Thornton regarding reworking structure/drafting/editing 1st half of mediation brief. Assign Attorney Thornton/S. Meachen tasks of creating "impossibility" slide based on available time versus "8 hour" work day 10.40	\$950.00	10.4	\$9,880.00	10.4	\$9,880.00						
12/19/2023	David Marks	Receive and review email from Attorney C. Healey attaching resumes of 2 experts just hired by Sunrise. Assign research to Attorney Thornton .20	\$950.00	0.2	\$190.00								
12/19/2023	David Marks	Email to Attorney Healey/Attorney Umpierre regarding multiple Sunrise documents containing "we are asking care managers to do the impossible" .10	\$950.00	0.1	\$95.00								
12/19/2023	David Marks	Receive and review Attorney Healey email regarding updated jury instructions he proposes be attached to mediation brief .40	\$950.00	0.4	\$380.00								
12/19/2023	David Marks	Send edited draft of mediation brief to team with summary of changes to first half of brief .20	\$950.00	0.2	\$190.00								
12/19/2023	Jim Thornton	GoToMeeting with David Marks working on mediation brief and sent our edits to team 10.4	\$500.00	10.4	\$5,200.00	10.4	\$5,200.00						
12/19/2023	Sterling Meachen	Confer with Marks on impossibility slide .3	\$225.00	0.3	\$67.50								
12/19/2023	Sterling Meachen	Begin work on slide showing impossibility of workload 1.6	\$225.00	1.6	\$360.00								
12/20/2023	Jacques Balette	Review, summarize and provide page/line edits to video transcript of son and resident at Sunrise of Mission Viejo 2017 - 2018	\$750.00	0.9	\$675.00								
12/20/2023	Jacques Balette	Watch video edits, make further edits, and grade the overall strength of witnesses' testimony	\$750.00	0.5	\$375.00								
12/20/2023	Jacques Balette	Watch completed edits and coordinate with team on usage	\$750.00	0.5	\$375.00								
12/20/2023	Jacques Balette	Review investigation file .2	\$750.00	0.2	\$150.00								
12/20/2023	Jacques Balette	Interview daughter whose mother resided at Sunrise of Seal Beach to determine personal knowledge of staffing, admissions, and willingness to provided witness statement, etc. .6	\$750.00	0.6	\$450.00								
12/20/2023	Jacques Balette	Prepare tailored outline for daughter with personal knowledge of staffing at Sunrise of Seal Beach 2015	\$750.00	0.5	\$375.00								
12/20/2023	Jacques Balette	Conduct video witness statement of daughter whose mother resided at Sunrise of Seal Beach 2015	\$750.00	0.3	\$225.00								
12/20/2023	Jacques Balette	Review documents produced by daughter whose mother resided at Sunrise of Seal Beach such as photos, written complaints, and emails	\$750.00	0.5	\$375.00								
12/20/2023	Jacques Balette	Follow-up T/C with witness from Sunrise of Seal Beach to discuss statement, search for documentation evidencing complaints, search for journals, etc.	\$750.00	0.4	\$300.00								
12/20/2023	Jacques Balette	Review investigation file .2	\$750.00	0.2	\$150.00								
12/20/2023	Jacques Balette	Interview daughter whose mother resided at Sunrise of Studio City to determine personal knowledge of staffing, admissions, and willingness to provided witness statement, etc. .4	\$750.00	0.4	\$300.00								
12/20/2023	Jacques Balette	Prepare tailored outline for daughter with personal knowledge of staffing at Sunrise of Studio City 2019 - 2020	\$750.00	0.4	\$300.00								
12/20/2023	Brent Moss	Review Inv. HF email Re: family member summaries	\$750.00	0.10	\$75.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/20/2023	Brent Moss	Review email from Atty. DTM Re: video and family statements	\$750.00	0.10		\$75.00								
12/20/2023	Brent Moss	Review email from Atty DTM Re: Sunrise La Costa family witness Re: witness preparation	\$750.00	0.10		\$75.00								
12/20/2023	Brent Moss	Review email from Inv. HF Re: Sunrise Fresno family witness video	\$750.00	0.10		\$75.00								
12/20/2023	Brent Moss	Review email from Inv. HF Re: Sunrise La Costa family witness video of written complaints	\$750.00	0.20		\$150.00								
12/20/2023	Brent Moss	Review 2 emails from Inv. HF Re: Sunrise La Costa family witness Re: family written complaints	\$750.00	0.20		\$150.00								
12/20/2023	Brent Moss	Review email from Inv. HF Re: Sunrise Fresno family witness	\$750.00	0.10		\$75.00								
12/20/2023	Brent Moss	Review investigation file and interview notes [.1]	\$750.00	0.10		\$75.00								
12/20/2023	Brent Moss	Conference with inv. Harry Fleming to discuss witness strengths & weaknesses [.2]	\$750.00	0.2		\$150.00								
12/20/2023	Brent Moss	Meeting with DTM re: witness interview [.2]	\$750.00	0.2		\$150.00								
12/20/2023	Brent Moss	Arrange time for witness interview [.1]	\$750.00	0.1		\$75.00								
12/20/2023	David Marks	Continue to work on video edits of family witnesses for upcoming mediation [9.00]	\$950.00	9		\$8,550.00		9	\$8,550.00					
12/20/2023	David Marks	Multiple emails to S. Meachen/Attorney Thornton regarding edit to mediation slides based on "7 hour available work time per shift" [.30]	\$950.00	0.3		\$285.00								
12/20/2023	David Marks	Receive and review from Attorney Yarnall correspondence regarding 300 possible new family witnesses (obtained from email blast/outreach to class members). Alerted Attorney Moss and H. Fleming. Identified common themes of families who received email blast. Assign to H. Fleming potential Hermosa Beach family witness [.30]	\$950.00	0.3		\$285.00								
12/20/2023	David Marks	Receive and review email from H. Fleming who regarding: (1) a new family witness who made inflammatory written complaints to Sunrise. Discussion regarding whether witnesses is willing to provide video statement for mediation or testifying at trial and; (2) a new family witness who is a physician reluctant to do video [.40]	\$950.00	0.4		\$380.00								
12/20/2023	David Marks	Receive and review email from Attorney Yarnall regarding status of DSS citation analysis [.10]	\$950.00	0.1		\$95.00								
12/20/2023	David Marks	Provide info into JAMs for upcoming mediation [.10]	\$950.00	0.1		\$95.00								
12/20/2023	Jim Thornton	Work with Sterling Meachen about impossible slide and showing 7 hours of available time [.4]	\$500.00	0.4		\$200.00								
12/20/2023	Jim Thornton	Emails and calls with Cristina Flores regarding Josh Allen [.7]	\$500.00	0.7		\$350.00								
12/20/2023	Sterling Meachen	Review emails from Marks on assignments	\$225.00	0.4		\$90.00								
12/21/2023	Jacques Balette	Conduct video witness statement of daughter whose mother resided at Sunrise of Studio City 2019 - 2020	\$750.00	0.3		\$225.00								
12/21/2023	Jacques Balette	Follow-up T/C with witness from Sunrise of Studio City to discuss statement, search for documentation evidencing complaints, search for journals, etc.	\$750.00	0.4		\$300.00								
12/21/2023	Brent Moss	Review email of Atty. DTM Re: Sunrise written complaint requests	\$750.00	0.10		\$75.00								
12/21/2023	Brent Moss	Review email from Inv.HF Re: Sunrise San Marino family witness	\$750.00	0.10		\$75.00								
12/21/2023	Brent Moss	Review email from Inv. HF Re: Photos used in witness interviews	\$750.00	0.10		\$75.00								
12/21/2023	Brent Moss	Meeting with Atty. DTM re: witness interview, review photos, email and refund check	\$750.00	0.50		\$375.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/21/2023	Brent Moss	Conduct video witness statement of Sunrise La Costa family witness	\$750.00	0.60	\$450.00								
12/21/2023	David Marks	Continue review edit of family videos for mediation 7.80	\$950.00	7.8	\$7,410.00	7.8	\$7,410.00						
12/21/2023	David Marks	Receive and review email from K. Ellis regarding new family witness with attached journal notes of observations/complaints. Assigned to H. Fleming .30	\$950.00	0.3	\$285.00								
12/21/2023	Jim Thornton	Emails with David Marks regarding Chris Healey's proposed language .2	\$500.00	0.2	\$100.00								
12/21/2023	Sterling Meachen	Update spreadsheet of video witnesses	\$225.00	0.8	\$180.00								
12/22/2023	Jacques Balette	Review documents produced by daughter whose mother resided at Sunrise of Studio City including multiple emails, multiple complaints with responses, and photo	\$750.00	2.4	\$1,800.00								
12/22/2023	Jacques Balette	Review, summarize and provide page/line edits to video transcript of daughter whose mother resided at Sunrise of Studio City 2019 - 2020	\$750.00	0.5	\$375.00								
12/22/2023	Jacques Balette	Watch video edits, make further edits, and grade the overall strength of witnesses' testimony	\$750.00	0.4	\$300.00								
12/22/2023	Jacques Balette	Watch completed edits and coordinate with team on usage	\$750.00	0.3	\$225.00								
12/22/2023	Jacques Balette	Meet with Attorney Marks and Attorney Moss re: witness grading	\$750.00	1.4	\$1,050.00								
12/22/2023	David Marks	Meet with Attorney Balette and Attorney Moss and discuss family witness grades 1.40	\$950.00	1.4	\$1,330.00								
12/22/2023	David Marks	Receive and review updated spreadsheet from S. Meachen with video witness grades added .10	\$950.00	0.1	\$95.00								
12/22/2023	David Marks	Continue review of new transcripts of family witness videos. Assign trial witness grades based on videos to transcripts and edit same for mediation 8.90	\$950.00	8.9	\$8,455.00	8.9	\$8,455.00						
12/22/2023	David Marks	Receive and review Attorney C. Healey email regarding issue of settlement agreement. The family witness who executed a settlement precludes use of written complaints by family in class case .10	\$950.00	0.1	\$95.00								
12/22/2023	David Marks	Teleconference with Attorney Healey regarding mediation presentation, videos, legal analysis of confidentiality of video statements .50	\$950.00	0.5	\$475.00								
12/22/2023	David Marks	Send emails to Attorney Healey regarding (1) question about whether Sunrise produced pendant data and (2) granny cam law in CA .20	\$950.00	0.2	\$190.00								
12/22/2023	Jim Thornton	Research regarding use of granny cam information and call to Cristina Flores to confirm same 1.4	\$500.00	1.4	\$700.00								
12/26/2023	David Marks	Receive and review update of family witness grades from Attorney Balette of his video statements. Integrate into witness spreadsheet .10	\$950.00	0.1	\$95.00								
12/26/2023	David Marks	Receive and review update of family witness grades from Attorney Moss of witnesses he interviewed. Integrate into witness spreadsheet .10	\$950.00	0.1	\$95.00								
12/27/2023	Jacques Balette	Review investigation notes from son whose father resided at Sunrise of Playa Vista and staffing data to determine if video statement needs to be conducted	\$750.00	0.3	\$225.00								
12/27/2023	Jacques Balette	Review investigation notes from daughter whose mother resided at Sunrise of Westlake Village and staffing data to determine if video statement needs to be conducted	\$750.00	0.4	\$300.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/27/2023	Jacques Balette	Review investigation notes from daughter whose mother resided at Sunrise of La Costa and staffing data to determine if video statement needs to be conducted	\$750.00	0.4	\$300.00								
12/27/2023	David Marks	Receive and review email from Attorney Moss regarding video interview of family witness today. Add to witness spreadsheet .10	\$950.00	0.1	\$95.00								
12/27/2023	David Marks	Receive and review email to Attorney Yarnall resident who died before class period. Do not interview family .10	\$950.00	0.1	\$95.00								
12/27/2023	Jim Thornton	Email from Brian Umpierre regarding delayed responses for requests for assistance .2	\$500.00	0.2	\$100.00								
12/28/2023	Jacques Balette	Review investigation notes from daughter whose mother resided at Sunrise of Seal Beach and staffing data to determine if video statement needs to be conducted	\$750.00	0.5	\$375.00								
12/28/2023	David Marks	Receive, review and notate updated mediation brief from Attorney Healey which integrates Attorney Yarnall and my changes to brief .60	\$950.00	0.6	\$570.00								
12/28/2023	David Marks	Receive and review "lice treatments" documentation from family witness sent to Attorney Moss .20	\$950.00	0.2	\$190.00								
12/29/2023	David Marks	Receive and review Attorney Healey proofed updated mediation brief .10	\$950.00	0.1	\$95.00								
12/30/2023	Jacques Balette	Review rough video edits for duration and rank each video for determination of mediation	\$750.00	2.1	\$1,575.00								
12/30/2023	Jacques Balette	Confer with attorneys regarding video witness statements for mediation	\$750.00	1.4	\$1,050.00								
12/30/2023	David Marks	Receive and review Attorney Healey and Attorney Thamer comment regarding Sunrise impact of rounding down staff hours and Attorney Healey index of attachments to mediation brief .20	\$950.00	0.2	\$190.00								
1/1/2024	David Marks	Receive and review email from H. Fleming on interview with new Hermosa Beach family witness and written complaints she made to Sunrise - need to obtain complaints ASAP in advance of video interview scheduled with Attorney Balette .10	\$950.00	0.1	\$95.00								
1/1/2024	Sterling Meachen	Video clip edits to new witness testimony for Jocelyn Katz and cut clips using Premiere	\$225.00	8.8	\$1,980.00		8.8						
1/2/2024	Jacques Balette	Review investigation file .2	\$750.00	0.2	\$150.00								
1/2/2024	Jacques Balette	Interview daughter whose mother resided at Sunrise of Palo Alto to determine personal knowledge of staffing, admissions, and willingness to provided witness statement, etc. .4	\$750.00	0.4	\$300.00								
1/2/2024	Jacques Balette	Prepare tailored outline for daughter with personal knowledge of staffing at Sunrise of Palo Alto 2021	\$750.00	0.4	\$300.00								
1/2/2024	Jacques Balette	Conduct video witness statement of daughter whose mother resided at Sunrise of Palo Alto 2021	\$750.00	0.3	\$225.00								
1/2/2024	Jacques Balette	Follow-up T/C with witness from Sunrise of Palo Alto to discuss statement, search for documentation evidencing complaints, search for journals, etc.	\$750.00	0.4	\$300.00								
1/2/2024	David Marks	Email to Attorney Healey/Attorney Umpierre regarding status of Sunrise production of assessments for all class members B. Peters to analyze .10	\$950.00	0.1	\$95.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/2/2024	David Marks	Meet with B. Peters regarding: (1) proposed analysis of resident assessments to determine service levels and diagnosis and; (2) count and percentage of residents by "neighborhood" based on Sunrise billing history data .20	\$950.00	0.2	\$190.00								
1/2/2024	David Marks	Received and reviewed written complaints from new Hermosa Beach family witness (via Attorney Yarnall email) .40	\$950.00	0.4	\$380.00								
1/2/2024	David Marks	Confer with S. Meachen regarding follow-up with H. Fleming, Attorney Moss, and Attorney Balette to ensure all written complaints by witnesses have been sent to S. Meachen for inclusion in video edits for mediation .2	\$950.00	0.2	\$190.00								
1/2/2024	David Marks	Review list of family witness with written complaints .3	\$950.00	0.3	\$285.00								
1/2/2024	David Marks	Mediation Prep: Revise/update - slide desk mediation presentation. Work with S. Meachen regarding same 4.70	\$950.00	4.7	\$4,465.00								
1/2/2024	David Marks	Teleconference with Attorney Thornton regarding proofing/editing mediation slides .20	\$950.00	0.2	\$190.00								
1/2/2024	David Marks	Continue prep for mediation. Edit video statements for mediation presentation integrating written complaints that evidence a pattern and practice of excessive waits for call light response 5.20	\$950.00	5.2	\$4,940.00								
1/2/2024	Sterling Meachen	Conferred with Attorney Jacques regarding which video testimony we received but did not have a transcript for .2	\$225.00	0.2	\$45.00								
1/2/2024	Sterling Meachen	Began adding Documents mentioned during witness testimony into video clips where they are mentioned 6.7	\$225.00	6.7	\$1,507.50	6.7	\$1,507.50						
1/2/2024	Sterling Meachen	Meet with Marks on slide presentation .3	\$225.00	0.3	\$67.50								
1/2/2024	Jim Thornton	Emails from David Marks and team related to update on assessment data request .2	\$500.00	0.2	\$100.00								
1/3/2024	Jacques Balette	Review, summarize and provide page/line edits to video transcript of daughter whose mother resided at Sunrise of Seal Beach 2015	\$750.00	0.5	\$375.00								
1/3/2024	Jacques Balette	Watch video edits, make further edits, and grade the overall strength of witness' testimony	\$750.00	0.4	\$300.00								
1/3/2024	Jacques Balette	Watch completed edits and coordinate with team on usage	\$750.00	0.3	\$225.00								
1/3/2024	David Marks	Meet with S. Zvonek regarding prep for mediation and notebooks - including exhibits to mediation brief .30	\$950.00	0.3	\$285.00								
1/3/2024	David Marks	Receive and review email from Attorney Healey regarding Sunrise failure to produce assessments .10	\$950.00	0.1	\$95.00								
1/3/2024	David Marks	Receive, review, and factcheck Sunrise mediation statement submitted to Judge Welsh. Flag disputed/inaccurate claims to address in mediation presentation 2.60	\$950.00	2.6	\$2,470.00								
1/3/2024	David Marks	Receive and review email from Attorney Yarnall about how many more witness interviews needed before mediation cut off and new potential witness (Lucinda A.) Attached is relevant written complaint from Lucinda about care issues that she sent to Sunrise and her mother's billing statements .40	\$950.00	0.4	\$380.00								
1/3/2024	David Marks	Teleconference with H. Fleming regarding how many more witness interviews before mediation .10	\$950.00	0.1	\$95.00								
1/3/2024	David Marks	Receive, review and edit Attorney Thornton's Sunrise key event time line slides for mediation slide .70	\$950.00	0.7	\$665.00								
1/3/2024	David Marks	Continue editing/cutting down length of video statements for mediation presentation integrating graphics and written complaints 6.10	\$950.00	6.1	\$5,795.00	6.1	\$5,795.00						

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/3/2024	David Marks	Receive and review Attorney Healey emails about newly identified defense expert and (2) defense argument that plaintiff's will not make favorable impressions .10	\$950.00	0.1	\$95.00								
1/3/2024	Sterling Meachen	Received Thornton's rendition of the ProModel Simulation Presentation – incorporate slides and compiled using Acrobat in preparation for Mediation	\$225.00	8.6	\$1,935.00	8.6	\$1,935.00						
1/3/2024	Jim Thornton	Work on updating slides for mediation 6.8	\$500.00	6.8	\$3,400.00	6.8	\$3,400.00						
1/3/2024	Jim Thornton	W/on time line slides 1.2	\$500.00	1.2	\$600.00								
1/3/2024	Jim Thornton	Emails with Brian Umpierre regarding Lacey depo video clips .2	\$500.00	0.2	\$100.00								
1/3/2024	Jacques Balette	Prepare summary of notable points from remaining videoed witness statements to be used at trial	\$750.00	1.8	\$1,350.00								
1/4/2024	Jacques Balette	Review, summarize and provide page/line edits to video transcript of daughter whose mother resided at Sunrise of Palo Alto 2021	\$750.00	0.4	\$300.00								
1/4/2024	Jacques Balette	Watch video edits, make further edits, and grade the overall strength of witness' testimony	\$750.00	0.4	\$300.00								
1/4/2024	Jacques Balette	Watch completed edits and coordinate with team on usage	\$750.00	0.3	\$225.00								
1/4/2024	Brent Moss	Review email from Inv. HF to Atty. DTM Re: Alta Loma	\$750.00	0.10	\$75.00								
1/4/2024	David Marks	Receive and watch video clips from family witness videos to present at mediation 4.0	\$950.00	4	\$3,800.00								
1/4/2024	David Marks	Discuss with S. Meachen, Attorney Moss, and Attorney Balette how to reduce length 1.1	\$950.00	1.1	\$1,045.00								
1/4/2024	David Marks	Receive, review and edit transcripts of additional video interviews with family witnesses - select clips to watch for possible use 2.80	\$950.00	2.8	\$2,660.00								
1/4/2024	David Marks	Review Attorney Healey email regarding draft injunction language (12/2023) with preliminary language attached. Work on draft injunctive relief to address staffing defect 1.80	\$950.00	1.8	\$1,710.00								
1/4/2024	David Marks	Family Interview Project: received and reviewed emails from Attorney Moss attaching photos from family of lice on the scalp and the face of Sunrise resident .3	\$950.00	0.3	\$285.00								
1/4/2024	David Marks	Discuss with S. Meachen where the photos are to be inserted into the current mediation video for this witness .2	\$950.00	0.2	\$190.00								
1/4/2024	Sterling Meachen	Received lice infestation photos to add into Bookstore witness video and also adding emails from witness Finn sent directly to nursing home added to their video 7.9	\$225.00	7.9	\$1,777.50	7.9	\$1,777.50						
1/4/2024	Sterling Meachen	Meet with Marks, Balette, and Moss regarding edits to videos .3	\$225.00	0.3	\$67.50								
1/4/2024	Jim Thornton	Work on mediation slides and sent to David Marks 2.2	\$500.00	2.2	\$1,100.00								
1/5/2024	David Marks	GoToMeeting with Attorney Thornton regarding injunctive language. Assign Attorney J. Thornton review of Ann Lacey depo regarding Sunrise staffing/analysis, interviews with care managers, and PowerPoints Lacey created regarding same. Determine if depo excerpts of value to mediation 1.00	\$950.00	1	\$950.00								
1/5/2024	David Marks	Receive, review, watch, and edit draft video clip of Fullerton family witness. Edited by Attorney Balette .80	\$950.00	0.8	\$760.00								
1/5/2024	David Marks	Receive, review and edit draft video clips of La Costa family witness for inclusion in mediation presentation .90	\$950.00	0.9	\$855.00								
1/5/2024	David Marks	Obtain contact info for question regarding JAMS Philadelphia video capability .10	\$950.00	0.1	\$95.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/5/2024	David Marks	Request/obtain info from Attorney Yarnall/K. Ellis regarding total number of prelim/initial interview conducted of class members .10	\$950.00	0.1	\$95.00								
1/5/2024	David Marks	Receive, review, watch, and edit family witness videos of Fresno and Studio City family witness 1.90	\$950.00	1.9	\$1,805.00								
1/5/2024	David Marks	Receive and review email from Attorney Healey regarding injunctive language and Sunrise claim in mediation brief regarding minimum staffing. Notated for injunctive relief .40	\$950.00	0.4	\$380.00								
1/5/2024	David Marks	Continue work on injunctive language (staffing requirements, monitoring section 2.30	\$950.00	2.3	\$2,185.00								
1/5/2024	David Marks	Receive and review S. Meachen updated video witness spreadsheet with summary of video clips per witness and time of clips .40	\$950.00	0.4	\$380.00								
1/5/2024	David Marks	Meet with S. Meachen and identify remaining final edits. Receive video uploads for Saturday edits schedule meeting for Sunday at 11 AM with S. Machen for continued video clip edits 1.50	\$950.00	1.5	\$1,425.00								
1/5/2024	David Marks	Receive and review Attorney Thornton edits to mediation slide deck. Still need average number of care task counts required per day per facility. Integrate approved edits into draft slides .30	\$950.00	0.3	\$285.00								
1/5/2024	David Marks	Receive and review Attorney Yarnall analysis of DSS citations for staffing. Notate for mediation presentation .30	\$950.00	0.3	\$285.00								
1/5/2024	David Marks	Teleconference with Attorney C. Healey regarding mediation preparation .30	\$950.00	0.3	\$285.00								
1/5/2024	David Marks	Teleconference call with CA team regarding status of mediation presentation and to dos .30	\$950.00	0.3	\$285.00			0.3	285				
1/5/2024	Sterling Meachen	Exported All Video into MPEG using Adobe Premiere and uploaded to Cloud Storage for Delivery and sharing with co counsel, edit length 2.1	\$225.00	2.1	\$472.50								
1/5/2024	Sterling Meachen	Confer with attorneys regarding videos .5	\$225.00	0.5	\$112.50								
1/5/2024	Sterling Meachen	Organize plays, check all content with statement 4.5	\$225.00	4.5	\$1,012.50								
1/5/2024	Sterling Meachen	Update video witness spreadsheet 3.2	\$225.00	3.2	\$720.00								
1/5/2024	Jim Thornton	GoToMeeting with David Marks regarding injunction language 1.0	\$500.00	1	\$500.00								
1/5/2024	Jim Thornton	W/on service counts slides and sent to David 4.8	\$500.00	4.8	\$2,400.00								
1/5/2024	Jim Thornton	Review of Lacey depo video and isolated key testimony for discussion .3	\$500.00	0.3	\$150.00								
1/5/2024	Jim Thornton	Sent link to Lacey depo video to David Marks .1	\$500.00	0.1	\$50.00								
1/6/2024	Jacques Balette	Watch all video witness statements for clarity, completeness, strength, and length of time	\$750.00	2.6	\$1,950.00								
1/6/2024	Jacques Balette	Meeting with attorneys to discuss witness statements for mediation	\$750.00	1.8	\$1,350.00								
1/6/2024	David Marks	Mediation prep: review Mazda Motors and Attorney Healey correspondence regarding distinguishing facts in Sunrise .20	\$950.00	0.2	\$190.00								
1/6/2024	David Marks	Continue work on Sunrise injunction - revise draft. Integrate common observations/experiences of family witnesses into compliance terms (unacceptable waits for call light response) 2.10	\$950.00	2.1	\$1,995.00								
1/6/2024	David Marks	Mediation prep: Continue review and final edits of transcripts of remaining videos for use at mediation 5.80	\$950.00	5.8	\$5,510.00								
1/6/2024	Jim Thornton	Continued work on injunction language 1.4	\$500.00	1.4	\$700.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/6/2024	Jim Thornton	Emails to Blake Peters regarding counts of services .3	\$500.00	0.3	\$150.00								
1/7/2024	Brent Moss	Review email from Atty. DTM Re: video edits	\$750.00	0.10	\$75.00								
1/7/2024	David Marks	Meeting with S. Meachen to continue final edits of remaining witness video clips for use at mediation and review of same 8.60	\$950.00	8.6	\$8,170.00	8.6	\$8,170.00						
1/7/2024	Sterling Meachen	Conferred with Attorney Marks editing witness Videos and ranking witness video by impact 6.8	\$225.00	6.8	\$1,530.00	6.8	\$1,530.00						
1/8/2024	Jacques Balette	Meet with Attorney Marks re: confidentiality of witness statements	\$750.00	0.4	\$300.00								
1/8/2024	Jacques Balette	Finalize witness statements, documents to be used with witness statements, summary of statement not being played and prepare reference sheet for each witness, strength of edit	\$750.00	6.8	\$5,100.00	6.8	\$5,100.00						
1/8/2024	Brent Moss	Review Atty JGB Re: Witness Statements used at Mediation	\$750.00	0.10	\$75.00								
1/8/2024	David Marks	Meeting with Attorney Balette regarding confidentiality of witness statements used at mediation .40	\$950.00	0.4	\$380.00								
1/8/2024	David Marks	Meeting with S. Meachen to continue final review and edits of remaining video clips 5.10	\$950.00	5.1	\$4,845.00								
1/8/2024	David Marks	Mediation prep and strategy: Meeting with S. Meachen, Attorney Balette, Attorney Moss for final viewing/edits to family witness video clips for mediation presentation. Discuss alternative methods for presenting to Judge Welsh. Select most powerful video clips to play if time is limited 8.30	\$950.00	8.3	\$7,885.00	8.3	\$7,885.00						
1/8/2024	Sterling Meachen	Continued to edit videos based on edits provided by Attorney Marks and update witness spreadsheet based upon changes 6.7	\$225.00	6.7	\$1,507.50	6.7	\$1,507.50						
1/8/2024	Sterling Meachen	Meet with Marks on all content, exhibits, etc. Discuss trial strategy and graphics needed 1.2	\$225.00	1.2	\$270.00								
1/9/2024	David Marks	Pack/organize materials/binders for mediation .50	\$950.00	0.5	\$475.00								
1/9/2024	David Marks	Meet with S. Meachen: Revisit order of video clips and make final edits, including uniform witness name plates, maps of facility location and cuts to videos to reduce time of play .3	\$950.00	0.3	\$285.00								
1/9/2024	David Marks	Received and reviewed final video edits from Attorney Balette and Attorney Moss 2.4	\$950.00	2.4	\$2,280.00								
1/9/2024	David Marks	Travel to Philly for mediation 6.30	\$950.00	6.3	\$5,985.00	6.3	\$5,985.00					6.3	5,985.00
1/9/2024	David Marks	Mediation Prep: (1) set up war room at hotel. (2) Meet with CA team (attendees: Attorney Healey, Attorney Thamer, K. Stebner, Attorney Yarnall, S. Meachen, Attorney Moss, Attorney Marks) to show/discuss final family videos and discuss mediation strategy and key settlement points, (3) final mediation prep to dos 1.90	\$950.00	1.9	\$1,805.00			1.9	1805				
1/9/2024	Sterling Meachen	Travel to Philadelphia for mediation	\$225.00	6.3	\$1,417.50	6.3	\$1,417.50					6.3	1417.5
1/9/2024	Sterling Meachen	Meet with Marks re: to do list .3	\$225.00	0.3	\$67.50								
1/9/2024	Sterling Meachen	Create a California map showcasing every location where witnesses are located with fire burst and continued Video Edits 2.5	\$225.00	2.5	\$562.50								
1/10/2024	David Marks	Attend Sunrise mediation in Philadelphia (JAMS) - Day 1 7.00	\$950.00	7	\$6,650.00	7	\$6,650.00						
1/10/2024	David Marks	Prepare for Day 2 mediation reedit injunction language regarding method for monitoring for staffing violations 1.80	\$950.00	1.8	\$1,710.00								
1/10/2024	David Marks	Meeting with team regarding Day 2 mediation .30	\$950.00	0.3	\$285.00			0.3	285				
1/10/2024	Sterling Meachen	Attend mediation day 1	\$225.00	7	\$1,575.00	7	\$1,575.00						
1/10/2024	Sterling Meachen	Work on new slides and edit for continued mediation.	\$225.00	2.6	\$585.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/11/2024	David Marks	Prepare for Day 2 mediation .90	\$950.00	0.9	\$855.00								
1/11/2024	David Marks	Attend Sunrise Day 2 mediation in Philadelphia (JAMS) 4.00	\$950.00	4	\$3,800.00								
1/11/2024	David Marks	Return travel to Houston 6.30	\$950.00	6.3	\$5,985.00	6.3	\$5,985.00					6.3	5,985.00
1/11/2024	Sterling Meachen	Attend mediation day 2.	\$225.00	4	\$900.00								
1/11/2024	Sterling Meachen	Travel to Houston	\$225.00	6.3	\$1,417.50	6.3	\$1,417.50					6.3	1,417.50
1/12/2024	David Marks	Receive and review correspondence from Attorney Healey regarding analysis of Judge Welch's mediators proposal .10	\$950.00	0.1	\$95.00								
1/12/2024	Sterling Meachen	Provided notes regarding the order & injunction that was discussed during mediation and made edits	\$225.00	7.4	\$1,665.00								
1/15/2024	Sterling Meachen	Outputting the final product of slide presentation using Acrobat, video edits using Premiere and other content for co counsel and attorney use.	\$225.00	7.8	\$1,755.00	7.8	\$1,755.00						
1/16/2024	David Marks	Receive and review case law regarding Sunrise's attorney fee position .60	\$950.00	0.6	\$570.00								
1/16/2024	David Marks	Receive and review Attorney Healey correspondence regarding Sunrise request for extension and response to same .10	\$950.00	0.1	\$95.00								
1/16/2024	David Marks	Teleconference with team regarding analysis of mediator's proposal and settlement negotiations/strategy .60	\$950.00	0.6	\$570.00			0.6	570				
1/22/2024	Brent Moss	Review email from Atty. DTM re: Draft Agenda for Texas Sunrise Meeting & next steps to take in prosecution of class action	\$750.00	0.30	\$225.00								
1/22/2024	David Marks	Receive and review correspondence from Attorney Healey regarding settlement update regarding Sunrise position on plaintiff's proposed injunction .10	\$950.00	0.1	\$95.00								
1/29/2024	David Marks	Receive and review Sunrise counter to plaintiff's proposed stipulated injunction. Notate same .60	\$950.00	0.6	\$570.00								
1/29/2024	David Marks	Begin revisions to injunctive language and send draft to Attorney Healey 1.30	\$950.00	1.3	\$1,235.00								
1/30/2024	David Marks	Receive, review and notate draft of revised injunction from Attorney Healey .30	\$950.00	0.3	\$285.00								
1/31/2024	David Marks	Receive, review and notate Attorney Healey's most recent updated injunction regarding pendant data .20	\$950.00	0.2	\$190.00								
1/31/2024	David Marks	GoToMeeting with Attorney Thornton regarding revisions (in response to Sunrise position) to proposed injunction .70	\$950.00	0.7	\$665.00								
1/31/2024	Jim Thornton	Work on proposed language of the injunction with David Marks .7	\$500.00	0.7	\$350.00								
2/2/2024	David Marks	Receive and review most recent proposed injunction and notate same for upcoming conference call .20	\$950.00	0.2	\$190.00								
2/2/2024	David Marks	Teleconference with CA team regarding injunction and settlement .50	\$950.00	0.5	\$475.00			0.5	475				
2/9/2024	David Marks	Receive and review update on settlement status and issue regarding for of call light pendant data .10	\$950.00	0.1	\$95.00								
2/9/2024	David Marks	Teleconference with Attorney Healey regarding call light pendant data provision of injunction .30	\$950.00	0.3	\$285.00								
2/12/2024	David Marks	Teleconference with Attorney Healey and Attorney Thornton regarding pendant data kept by Sunrise and injunctive provision .50	\$950.00	0.5	\$475.00								
2/12/2024	Jim Thornton	Call with Chris Healey and David Marks regarding injunction valuation .5	\$500.00	0.5	\$250.00								
2/13/2024	David Marks	Receive and review most recent draft of injunction based on recent call .20	\$950.00	0.2	\$190.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
2/13/2024	Jim Thornton	Received and reviewed email from Chris Healey regarding the call light systems used by Sunrise for purposes of the injunction [.3]	\$500.00	0.3	\$150.00								
2/13/2024	Jim Thornton	Researched specs and software capabilities, particularly export csv capabilities, of each of the 4 pendant/call light systems and sent team information regarding same [.6]	\$500.00	0.6	\$300.00								
2/13/2024	Jim Thornton	Email to Blake Peters regarding 4 pendant/call light systems [.2]	\$500.00	0.2	\$100.00								
2/14/2024	David Marks	Receive and review correspondence from Attorney Healey with proposed new injunctive language regarding call light data based on Sunrise "technology limitations". [.2]	\$950.00	0.2	\$190.00								
2/14/2024	David Marks	Notate and discuss research of same and upcoming call with Sunrise about technology with Attorney J. Thornton [.3]	\$950.00	0.3	\$285.00								
2/14/2024	Jim Thornton	Call with Blake Peters regarding Smart Care and Arial call light systems [.3]	\$500.00	0.3	\$150.00								
2/14/2024	Jim Thornton	Email to David Marks and Chris Healey regarding those systems [.1]	\$500.00	0.1	\$50.00								
2/14/2024	Jim Thornton	Email to Mike Perry regarding call scheduled [.1]	\$500.00	0.1	\$50.00								
2/14/2024	Jim Thornton	Prep for and attended call with Kathryn Stebner and defense counsel Lee regarding call light systems and issues [1.0]	\$500.00	1	\$500.00								
2/15/2024	David Marks	Five (5) calls to and from Attorney C. Healey regarding Sunrise capacity to capture call light data at specific facilities and modification of injunctive language to address these capacities [1.00]	\$950.00	1	\$950.00								
2/15/2024	David Marks	Receive and review Attorney Thornton's correspondence regarding Sunrise capacity to retrieve call light works on final position regarding call light provisions in injunction [.80]	\$950.00	0.8	\$760.00								
2/15/2024	David Marks	Receive, review, and update final injunction (from Attorney Healey) prior to it being sent to Sunrise [.10]	\$950.00	0.1	\$95.00								
2/15/2024	Jim Thornton	Work on edits to stipulated injunctions and sent to David Marks [.5]	\$500.00	0.5	\$250.00								
2/16/2024	David Marks	Receive and review Sunrise's final position on injunction and respond to multiple emails (from Attorney Healey/K. Stebner) about issues: (1) call light monitoring; (2) length of injunction; (3) specific facilities; (4) no round down formula [.30]	\$950.00	0.3	\$285.00								
2/22/2024	David Marks	Receive and review correspondence from Attorney Healey regarding injunction valuation questions, supporting declarations of experts, and expert extrapolation of staffing short fall analysis [.20]	\$950.00	0.2	\$190.00								
2/22/2024	Jim Thornton	Emails with Blake Peters regarding staffing data for analysis [.2]	\$500.00	0.2	\$100.00								
2/22/2024	Jim Thornton	Review of email from Chris Healey regarding injunction evaluation [.3]	\$500.00	0.3	\$150.00								
2/22/2024	Jim Thornton	Review of prior regression analysis information based on simulations performed for 6 facilities and compiled available information and sent to David Marks [3.2]	\$500.00	3.2	\$1,600.00								
2/23/2024	Jim Thornton	Prepared draft of Declaration of Cristina Flores regarding value of injunction [4.8]	\$500.00	4.8	\$2,400.00								
2/23/2024	Jim Thornton	Sent draft dec of Flores to David Marks for review with proposed Injunction language [.2]	\$500.00	0.2	\$100.00								
2/27/2024	Brent Moss	Review email from Atty. DTM to Atty. Healey Re: Sunrise Family Witnesses	\$750.00	0.10	\$75.00								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
						<u>General Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
2/27/2024	Brent Moss	Review email from Atty. DTM Re: Sunrise Mission Viejo family witness	\$750.00	0.10	\$75.00								
2/27/2024	David Marks	Receive and review correspondence from Attorney Healey regarding deadlines for preliminary approval motion and supporting expert declarations .10	\$950.00	0.1	\$95.00								
2/27/2024	David Marks	Sent questions and received answer regarding notification of family witness regarding settlement agreement .10	\$950.00	0.1	\$95.00								
2/27/2024	Jim Thornton	Email to Davis Marks regarding further evidence supporting applicability of regression to other facilities .3	\$500.00	0.3	\$150.00								
2/28/2024	David Marks	Receive, review, and edit draft Dr. Flores declaration for preliminary approval motion .50	\$950.00	0.5	\$475.00								
3/4/2024	Jim Thornton	Updated Flores declaration and sent same to David Marks review .5	\$500.00	0.5	\$250.00								
3/4/2024	Jim Thornton	Pulled and reviewed prior regression analysis performed for all facilities with available data 1.2	\$500.00	1.2	\$600.00								
3/4/2024	Jim Thornton	Email to David Marks regarding deadlines for preliminary approval motion, Flores dec. and regression analysis .2	\$500.00	0.2	\$100.00								
3/5/2024	Jim Thornton	Sent follow up email to David Marks regarding regression data .1	\$500.00	0.1	\$50.00								
3/5/2024	Jim Thornton	Received and reviewed Chris Healey's additional language for proposed inclusion in Flores dec .2	\$500.00	0.2	\$100.00								
3/5/2024	Jim Thornton	Emails with David Marks regarding proposed language .1	\$500.00	0.1	\$50.00								
3/11/2024	Jim Thornton	Sent follow up email to David Marks regarding regression data .1	\$500.00	0.1	\$50.00								
3/12/2024	David Marks	Receive and review prior regression analysis to calculate staffing short fall .40	\$950.00	0.4	\$380.00								
3/12/2024	David Marks	Teleconference with Attorney J. Thornton to discuss same .30	\$950.00	0.3	\$285.00								
3/12/2024	David Marks	Teleconference with Attorney C. Healey regarding draft regression report regarding staffing analysis .30	\$950.00	0.3	\$285.00								
3/12/2024	Jim Thornton	Additional review of regression materials and prepped them for forwarding to expert Pat Kennedy .4	\$500.00	0.4	\$200.00								
3/12/2024	Jim Thornton	Email to David Marks regarding regression materials for Pat Kennedy .1	\$500.00	0.1	\$50.00								
3/12/2024	Jim Thornton	Email to Blake Peters regarding availability of additional staffing data .2	\$500.00	0.2	\$100.00								
3/12/2024	Jim Thornton	Emails setting up call to discuss Pat Kennedy and Flores decs .1	\$500.00	0.1	\$50.00								
3/12/2024	Jim Thornton	Call with David Marks and Chris Healey regarding settlement and injunction .3	\$500.00	0.3	\$150.00								
3/12/2024	Jim Thornton	Emailed draft dec to Cristina Flores for her review .2	\$500.00	0.2	\$100.00								
3/12/2024	Jim Thornton	Review of email from Flores regarding schedule to discuss dec .1	\$500.00	0.1	\$50.00								
3/13/2024	Jim Thornton	W/on attempting to identify facilities who had name changes at Sunrise and sent Chris Healey and Brian Umpierre information regarding same .3	\$500.00	0.3	\$150.00								
3/13/2024	Jim Thornton	Work with Blake Peters regarding facility name changes .3	\$500.00	0.3	\$150.00								
3/15/2024	Jim Thornton	Call with expert Cristina Flores regarding her declaration and her edits .5	\$500.00	0.5	\$250.00								
3/15/2024	Jim Thornton	Email to Flores with final version of her dec .2	\$500.00	0.2	\$100.00								
3/20/2024	Jim Thornton	Emails with Chris Healey setting up call with Kennedy .2	\$500.00	0.2	\$100.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel		
						General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
3/21/2024	Jim Thornton	Sent executed Flores declaration to Chris Healey and David Marks .1	\$500.00	0.1	\$50.00									
3/21/2024	Jim Thornton	Emails to and from Chris Healey regarding conference with Kennedy .2	\$500.00	0.2	\$100.00									
3/21/2024	Jim Thornton	Brief email to Cristina Flores confirming receipt of her executed dec .1	\$500.00	0.1	\$50.00									
3/22/2024	Jim Thornton	Prep for and attended conference call with expert Pat Kennedy and Chris Healey regarding valuation of the injunction based on regression .8	\$500.00	0.8	\$400.00									
3/26/2024	Jim Thornton	Review of email from Chris Healey regarding base fee analysis and his discussions with Lindsay Petite regarding same .2	\$500.00	0.2	\$100.00									
3/26/2024	Jim Thornton	Pulled Sunrise 3134 points spreadsheet and sent to Chris Healey with note regarding staffing component included in base fee per 3134 spreadsheet .3	\$500.00	0.3	\$150.00									
3/27/2024	Jim Thornton	Review of emails from Chris Healey and Lindsay Petite regarding base fee analysis .3	\$500.00	0.3	\$150.00									
3/27/2024	Jim Thornton	Email to Chris Healey with impressions of how to separate room and board from services in Base fee .6	\$500.00	0.6	\$300.00									
4/10/2024	Jim Thornton	Emails with Brian Umpierre regarding # of Giga Bytes of experts materials produced in case .2	\$500.00	0.2	\$100.00									
4/11/2024	Jim Thornton	Work on calculating # of Giga Bytes of experts materials produced in case and sent same to Brian Umpierre .3	\$500.00	0.3	\$150.00									
Total Lodestar				4505.4	\$2,956,566.50									
Lodestar Reductions														
						836.2	\$505,342	72.4	\$51,835	0	\$0	62.5	\$37,945	
						50%	50%	30%	30%	100%	100%	50%	50%	
						Subt	418.1	\$ 252,671	21.72	\$ 15,551	0	\$0	31.25	\$ 18,973
													100.00%	
													\$31	
						General	418.1	\$252,671						
						CC Confs	21.72	\$15,551						
						Falkenberg	0	\$0						
						Travel	31.25	\$18,973						
						Total	471.07	\$287,194						
Net Lodestar					\$2,669,372.75									

Category	Amount
Experts - Data Analysis (Superior Analytics)	\$420,833.75
Experts - Software charge (ProModel)	\$3,845.04
Witness Searches, Locates, Investigations, and Interviews (New Paladin)	\$91,421.74
FOIA request expense	\$30.31
Court reporter	\$8,182.44
Court reporter	\$36,973.46
Travel	\$4,806.28
Hotel and food	\$13,697.60
Court Fees (Pro hac)	\$1,051.26

<u>Fees</u>	<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Fees</u>	<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
							General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
			Delivery services	\$471.17										
				\$581,313.05										

OLIVIER

Olivier & Schrieber - Lodestar Fees

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
5/31/2022	MO	Review correspondence from co-counsel re consulting on 23f appeal	\$ 1,050.00	0.200		\$210.00								
7/18/2022	MO	Review correspondence from co-counsel re scheduling call to discuss 23f appeal	\$ 1,050.00	0.200		\$210.00								
7/25/2022	MO	Review class certification order	\$ 1,050.00	1.000		\$1,050.00								
7/25/2022	MO	Confer with co-counsel re issues for 23f petition	\$ 1,050.00	0.800		\$840.00			0.800	\$ 840.000				
8/8/2022	MO	Review correspondence from co-counsel re Starkist Writ of Cert. petition	\$ 1,050.00	0.200		\$210.00								
9/9/2022	MO	Review correspondence from co-counsel re consulting agreement	\$ 1,050.00	0.200		\$210.00								
9/9/2022	MO	Review correspondence from co-counsel re Defendants' Opening Brief	\$ 1,050.00	0.200		\$210.00								
9/10/2022	MO	Review correspondence from co-counsel re scheduling call to discuss 23f appeal	\$ 1,050.00	0.200		\$210.00								
9/12/2022	MO	Review agenda for call with co-counsel re 23f appeal	\$ 1,050.00	0.200		\$210.00								
9/13/2022	MO	Review correspondence from co-counsel re Opposition to Appellants' Motion to Maintain Seal	\$ 1,050.00	0.200		\$210.00								
9/13/2022	MO	Review correspondence from co-counsel re Opposition to Appellants' Motion to Maintain Seal	\$ 1,050.00	0.400		\$420.00								
9/13/2022	MO	Email team re consenting to amicus filings	\$ 1,050.00	0.200		\$210.00								
9/13/2022	MO	Review correspondence from co-counsel re amicus brief approval	\$ 1,050.00	0.200		\$210.00								
9/13/2022	MO	Review correspondence from co-counsel re class cert order review	\$ 1,050.00	0.200		\$210.00								
9/14/2022	MO	Review correspondence from co-counsel re example opposititon to 23f petition	\$ 1,050.00	0.200		\$210.00								
9/15/2022	MO	Review correspondance from co-counsel re class cert order review	\$ 1,050.00	0.400		\$420.00								
9/15/2022	MO	Review correspondence from co-counsel re Opposition to Appellants' Motion to Maintain Seal	\$ 1,050.00	0.200		\$210.00								
9/16/2022	MO	Review correspondence from co-counsel re Chamber of Commerce amicus brief	\$ 1,050.00	0.200		\$210.00								
9/19/2022	MO	Review correspondence from co-counsel re Judge Staton's Class Certification order	\$ 1,050.00	0.200		\$210.00								
9/21/2022	MO	Review correspondence from co-counsel re ASHA, Argentum, and CALA's amicus brief	\$ 1,050.00	0.200		\$210.00								
9/21/2022	MO	Review correspondence from co-counsel re Seconded Amended Complaint	\$ 1,050.00	0.200		\$210.00								
9/21/2022	MO	Circulate briefing examples to co-counsel	\$ 1,050.00	0.300		\$315.00								
9/22/2022	MO	Review correspondence re Sunrise's opening brief	\$ 1,050.00	0.200		\$210.00								
9/22/2022	MO	Review correspondence from co-counsel re hearing transcripts	\$ 1,050.00	0.200		\$210.00								
9/22/2022	MO	Review correspondence from co-counsel re supplementing EOR	\$ 1,050.00	0.200		\$210.00								
9/25/2022	MO	Confer with co-counsel re appellate brief strategy, amicus support	\$ 1,050.00	0.800		\$840.00			0.5		840			
9/25/2022	MO	Review and respond to emails re EOR	\$ 1,050.00	0.500		\$525.00								
9/26/2022	MO	Review correspondence from co-counsel re EOR	\$ 1,050.00	0.200		\$210.00								
9/27/2022	MO	Email team re briefing deadlines	\$ 1,050.00	0.200		\$210.00								
10/3/2022	MO	Review correspondence from co-counsel re draft appellate brief	\$ 1,050.00	0.200		\$210.00								
10/4/2022	MO	Review correspondence from co-counsel re evidence in Sunrise's opening brief	\$ 1,050.00	0.200		\$210.00								
10/7/2022	MO	Review correspondence from co-counsel re draft appellate brief	\$ 1,050.00	0.200		\$210.00								
10/10/2022	MO	Review correspondence from co-counsel re schedule call on appellate briefing	\$ 1,050.00	0.200		\$210.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
10/11/2022	MO	Email team update re call on appellate briefing	\$ 1,050.00	0.200		\$210.00								
10/11/2022	MO	Review Chamber of Commerce and ASHA, Argentum, and CALA amicus briefs	\$ 1,050.00	0.300		\$315.00								
10/11/2022	MO	Review correspondence from co-counsel re evidence in Sunrise's opening brief	\$ 1,050.00	0.200		\$210.00								
10/11/2022	MO	Review correspondence from co-counsel re merits panel	\$ 1,050.00	0.200		\$210.00								
10/11/2022	MO	Research re same	\$ 1,050.00	0.200		\$210.00								
10/11/2022	MO	Review correspondence from co-counsel re appellate brief	\$ 1,050.00	0.200		\$210.00								
10/13/2022	MO	Review correspondence from co-counsel re appellate brief	\$ 1,050.00	0.100		\$105.00								
10/21/2022	MO	Review drafts to date of opposition to Rule 23f	\$ 1,050.00	3.000		\$3,150.00								
10/21/2022	MO	Email among team re strategy questions/issues for appeal	\$ 1,050.00	0.5		525								
10/22/2022	MO	Review correspondence from co-counsel re expert testimony	\$ 1,050.00	0.200		\$210.00								
11/4/2022	MO	Review correspondence from co-counsel re amicus support call/amicus issues	\$ 1,050.00	0.400		\$420.00								
11/7/2022	MO	Review correspondence from co-counsel re amicus support call/amicus issues	\$ 1,050.00	0.300		\$315.00								
11/8/2022	MO	Review correspondence from co-counsel re answering brief draft	\$ 1,050.00	0.200		\$210.00								
11/9/2022	MO	Review correspondence from co-counsel re appeal brief action items	\$ 1,050.00	0.400		\$420.00								
11/10/2022	MO	Email team update re appellate brief review	\$ 1,050.00	0.200		\$210.00								
11/13/2022	MO	Review and revise SOF section of Respondent's Brief	\$ 1,050.00	5.500		\$5,775.00								
11/14/2022	MO	Research re panel assignment when 23f granted	\$ 1,050.00	0.200		\$210.00								
11/14/2022	MO	Report back to team re same	\$ 1,050.00	0.200		\$210.00								
11/14/2022	MO	Review AOB SOF section, continue review/revision of SOF in Respondent's Brief	\$ 1,050.00	0.700		\$735.00								
11/14/2022	MO	Confer with co-counsel re same	\$ 1,050.00	0.500		\$525.00								
11/15/2022	MO	Confer with co-counsel to discuss status of brief to date, strategy re presentation of facts and legal arguments/structure	\$ 1,050.00	1.000		\$1,050.00			1		1,050			
11/15/2022	MO	Follow up research re presentation of record and facts on appeal	\$ 1,050.00	0.400		\$420.00								
11/15/2022	MO	Confer with co-counsel re same	\$ 1,050.00	0.200		\$210.00								
11/17/2022	MO	Review correspondence from co-counsel re amicus issues	\$ 1,050.00	0.200		\$210.00								
11/18/2022	MO	Review correspondence re amicus meeting schedule	\$ 1,050.00	0.100		\$105.00								
11/22/2022	MO	Review and respond to correspondence from co-counsel re AOB filing extension	\$ 1,050.00	0.400		\$420.00								
11/29/2022	MO	Review correspondence re amicus brief deadline	\$ 1,050.00	0.100		\$105.00								
12/2/2022	MO	Review correspondence from co-counsel re brief citations	\$ 1,050.00	0.200		\$210.00								
12/22/2022	MO	Review correspondence from co-counsel re AOB draft and schedule for call	\$ 1,050.00	0.400		\$420.00								
12/27/2022	MO	Review new draft of Respondent's Brief	\$ 1,050.00	0.600		\$630.00								
12/27/2022	MO	Outline issues for review	\$ 1,050.00	0.600		\$630.00								
12/28/2022	MO	Confer with co-counsel re status of brief and timing for oral argument and decision	\$ 1,050.00	0.300		\$315.00			0.3	\$	315.000			
12/28/2022	MO	Review and revise Respondent's Brief - restructuring argument sections/headings and redlining legal argument section	\$ 1,050.00	4.800		\$5,040.00								
12/29/2022	MO	Continued review and revision of legal argument section of Respondent's Brief	\$ 1,050.00	2.900		\$3,045.00								
12/29/2022	MO	Confer with co-counsel re same	\$ 1,050.00	0.500		\$525.00			0.500	\$	525.000			
12/29/2022	MO	Draft revised TOC/headings for reorganization of legal argument of Respondent's Brief	\$ 1,050.00	0.500		\$525.00								
1/3/2023	MO	Confer with C. Healey re status of appellate brief	\$ 1,050.00	0.100		\$105.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/3/2023	MO	Reorganization of various arguments in legal argument section of Respondent's Brief	\$ 1,050.00	0.300										
1/3/2023	MO	Confer with G. Wallace re status of Respondent's Brief and strategy re legal arguments	\$ 1,050.00	0.300	\$315.00									
1/4/2023	MO	Confer with team re status of Respondent's Brief, structuring of legal arguments, citation and record issues, amicus support, timeline for completion	\$ 1,050.00	1.000	\$1,050.00				1	1,050.00				
1/5/2023	MO	Review correspondence from co-counsel re AOB to-do list	\$ 1,050.00	0.200	\$210.00									
1/6/2023	MO	Confer with G. Wallace re revisions to central allegations for purposes of Respondent's Brief	\$ 1,050.00	0.200	\$210.00									
1/6/2023	MO	Confer with team re status of brief and next set of revisions	\$ 1,050.00	0.100										
1/9/2023	MO	Review and revise Respondent's Brief	\$ 1,050.00	5.800	\$6,090.00									
1/10/2023	MO	Review and revise Respondent's Brief	\$ 1,050.00	2.400	\$2,520.00									
1/11/2023	MO	Review and revise Respondent's Brief	\$ 1,050.00	6.700	\$7,035.00									
1/12/2023	MO	Confer with team re latest edits to Respondent's Brief and status for further revisions	\$ 1,050.00	0.300	\$315.00				0.3		315			
1/13/2023	MO	Meeting with amici counsel to discuss status of merits brief and arguments for amicus brief	\$ 1,050.00	0.700	\$735.00									
1/13/2023	MO	Revise summary of argument for Respondent's Brief	\$ 1,050.00	1.600	\$1,680.00									
1/13/2023	MO	Confer with team re same	\$ 1,050.00	0.500	\$525.00									
1/14/2023	MO	Review and respond to team emails re second amicus brief	\$ 1,050.00	0.200	\$210.00									
1/14/2023	MO	Follow up with A. Shaver re possible amicus brief from consumer groups	\$ 1,050.00	0.100										
1/18/2023	MO	Review correspondence from co-counsel re AOB draft and to-do list	\$ 1,050.00	0.900	\$945.00									
1/19/2023	MO	Coordinate amicus efforts for second amicus brief ISO Plaintiffs	\$ 1,050.00	1.300	\$1,365.00									
1/20/2023	MO	Review correspondence from co-counsel re amicus briefs	\$ 1,050.00	0.200	\$210.00									
1/20/2023	MO	Review correspondence re amicus brief draft	\$ 1,050.00	0.200	\$210.00									
1/20/2023	MO	Email team re additional edits/suggestions	\$ 1,050.00	0.200	\$210.00									
1/21/2023	MO	Review correspondence re amicus brief draft edits/suggestions	\$ 1,050.00	0.200	\$210.00									
1/23/2023	MO	Review correspondence from co-counsel re AOB draft	\$ 1,050.00	0.200	\$210.00									
1/24/2023	MO	Review correspondence from co-counsel re AOB draft edits/suggestion	\$ 1,050.00	0.200	\$210.00									
1/24/2023	MO	Review and respond to correspondence re co-counsel re hyperlink requirements on AOB	\$ 1,050.00	0.400	\$420.00									
1/26/2023	MO	Review correspondence from co-counsel re AOB draft edits/suggestion	\$ 1,050.00	0.200	\$210.00									
1/27/2023	MO	Review and respond to correspondence from co-counsel re amicus briefs	\$ 1,050.00	0.600	\$630.00									
1/27/2023	MO	Review correspondence from co-counsel re injunction orders	\$ 1,050.00	0.200	\$210.00									
1/29/2023	MO	Circulate finalized answering brief to co-counsel for review	\$ 1,050.00	0.200	\$210.00									
1/29/2023	MO	Email team re NACA amicus brief	\$ 1,050.00	0.200	\$210.00									
2/1/2023	MO	Email update to team re LCHB statement of interest and brief	\$ 1,050.00	0.400	\$420.00									
2/1/2023	MO	Email AARP team re consent to file amicus brief	\$ 1,050.00	0.400	\$420.00									
2/1/2023	MO	Review correspondence from co-counsel re oral argument prep	\$ 1,050.00	0.300	\$315.00									
2/2/2023	MO	Coordinate amici for LCHB brief	\$ 1,050.00	0.400	\$420.00									
2/2/2023	MO	Confer with G. Wallace re same	\$ 1,050.00	0.200	\$210.00									
2/2/2023	MO	Review and comment on amicus brief	\$ 1,050.00	1.000	\$1,050.00									
2/3/2023	MO	Confer with LCHB counsel and T. Mermin re SOI for amicus brief	\$ 1,050.00	0.200	\$210.00									
2/3/2023	MO	Review correspondence from LCHB counsel re amicus brief on behalf of NACA, NCLC, Berkeley Center	\$ 1,050.00	0.300	\$315.00									
2/6/2023	MO	Review correspondence from co-counsel re	\$ 1,050.00	0.200	\$210.00									
2/7/2023	MO	Circulate final versions of AOB and amicus brief to amicus team	\$ 1,050.00	0.200	\$210.00									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
2/16/2023	MO	Review correspondence from co-counsel re Opposition to Motion to Seal SER	\$ 1,050.00	0.200		\$210.00								
2/20/2023	MO	Review correspondence from co-counsel re Opposition to Motion to Seal SER	\$ 1,050.00	0.200		\$210.00								
2/21/2023	MO	Review correspondence from co-counsel re Opposition to Motion to Seal SER	\$ 1,050.00	0.200		\$210.00								
3/15/2023	MO	Review correspondence from co-counsel re Ninth Circuit Katie Van decision	\$ 1,050.00	0.200		\$210.00								
3/21/2023	MO	Review correspondence from co-counsel re Sunrise's Reply Brief	\$ 1,050.00	0.200		\$210.00								
3/27/2023	MO	Email update to team re call on Sunrise's Reply Brief	\$ 1,050.00	0.200		\$210.00								
4/4/2023	MO	Review correspondence from co-counsel re Sunrise's Reply Brief	\$ 1,050.00	0.100		\$105.00								
4/6/2023	MO	Review correspondence from co-counsel re Rule 28(j) response letter	\$ 1,050.00	0.200		\$210.00								
5/1/2023	MO	Review correspondence from co-counsel re oral argument prep session	\$ 1,050.00	0.100		\$105.00								
5/3/2023	MO	Review correspondence from co-counsel re expert value quantification analysis	\$ 1,050.00	0.200		\$210.00								
5/6/2023	MO	Confer with C. Healey re potential waiver argument	\$ 1,050.00	0.300		\$315.00								
5/8/2023	MO	Confer with C. Healey re potential waiver argument	\$ 1,050.00	0.300		\$315.00								
5/24/2023	MO	Review correspondence from co-counsel re draft responses to Sunrise's Reply Brief	\$ 1,050.00	0.200		\$210.00								
5/25/2023	MO	Review correspondence from co-counsel re draft responses to Sunrise's Reply Brief	\$ 1,050.00	0.200		\$210.00								
5/26/2023	MO	Review correspondence from co-counsel re draft Opening/Affirmative Argument	\$ 1,050.00	0.200		\$210.00								
5/29/2023	MO	Review and respond to correspondence from co-counsel re draft responses to Sunrise's Reply Brief	\$ 1,050.00	0.200		\$210.00								
5/30/2023	MO	Draft Q&A for Oral Argument and circulate to co-counsel	\$ 1,050.00	1.200		\$1,260.00								
5/30/2023	MO	Review correspondence from co-counsel re draft Opening/Affirmative Argument	\$ 1,050.00	0.400		\$420.00								
6/1/2023	MO	Review correspondence from co-counsel re draft Opening/Affirmative Argument	\$ 1,050.00	0.200		\$210.00								
6/6/2023	MO	Review CH revised oral argument outline	\$ 1,050.00	0.300		\$315.00								
6/6/2023	MO	Participate in moot court for oral argument	\$ 1,050.00	1.500		\$1,575.00								
6/7/2023	MO	Confer with G. Wallace re oral argument	\$ 1,050.00	0.200		\$210.00								
6/14/2023	MO	Review correspondence from co-counsel re oral argument preparation	\$ 1,050.00	0.400		\$420.00								
6/15/2023	MO	Email co-counsel re oral argument preparation	\$ 1,050.00	0.200		\$210.00								
6/20/2023	MO	Email co-counsel key talking points and questions for oral argument	\$ 1,050.00	0.500		\$525.00								
6/20/2023	MO	Review correspondence from co-counsel re same	\$ 1,050.00	0.200		\$210.00								
6/21/2023	MO	Review correspondence from co-counsel re oral argument moot court	\$ 1,050.00	0.200		\$210.00								
7/2/2023	MO	Review correspondence from co-counsel re payor issue	\$ 1,050.00	0.200		\$210.00								
7/3/2023	MO	Review and respond to correspondence from co-counsel re payor issue	\$ 1,050.00	0.600		\$630.00								
7/5/2023	MO	Review and respond to correspondence from co-counsel re class cert decision analysis	\$ 1,050.00	0.400		\$420.00								
7/6/2023	MO	Review and respond to correspondence from co-counsel re class cert decision analysis	\$ 1,050.00	1.000		\$1,050.00								
7/7/2023	MO	Review correspondence from co-counsel re Q&A revision for oral argument	\$ 1,050.00	0.200		\$210.00								
7/10/2023	MO	Email update to team re Opposition to Motion to strike Dr. Flores	\$ 1,050.00	0.200		\$210.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
7/10/2023	MO	Review correspondence from co-counsel re same	\$ 1,050.00	0.200	\$210.00								
7/11/2023	MO	Review correspondence from co-counsel re sealing issue	\$ 1,050.00	0.200	\$210.00								
7/12/2023	MO	Email update to team re sealing issue review	\$ 1,050.00	0.100	\$105.00								
7/12/2023	MO	Review correspondence from co-counsel re same	\$ 1,050.00	0.100	\$105.00								
7/13/2023	MO	Review correspondence from co-counsel re en banc hearing	\$ 1,050.00	0.400	\$420.00								
7/17/2023	MO	Review correspondence from co-counsel re Response to Sunrise's Citation of Supplemental Authorities	\$ 1,050.00	0.200	\$210.00								
7/18/2023	MO	Review Response to Sunrise's Citation of Supplemental Authorities draft and update team	\$ 1,050.00	0.300	\$315.00								
8/2/2023	MO	Review correspondence from co-counsel re Ninth Circuit decision	\$ 1,050.00	0.200	\$210.00								
8/3/2023	MO	Review correspondence from co-counsel re requesting publication	\$ 1,050.00	0.400	\$420.00								
8/4/2023	MO	Review correspondence from co-counsel re requesting publication	\$ 1,050.00	0.600	\$630.00								
8/17/2023	MO	Review correspondence from co-counsel re appeal status	\$ 1,050.00	0.200	\$210.00								
10/13/2023	MO	Review and respond to correspondence from co-counsel re potential class cert. petition	\$ 1,050.00	0.400	\$420.00								
10/31/2023	MO	Review correspondence from co-counsel re mediation preparation	\$ 1,050.00	0.200	\$210.00								
4/25/2024	MO	Review and respond to correspondence from co-counsel re lodestar fees and costs	\$ 1,050.00	0.400	\$420.00								
4/26/2024	AB	Review and correct billing entries	\$ 250.00	1.250	\$312.50	1.25	\$312.50						
4/29/2024	AB	Review and correct billing entries and cross-check with public folder	\$ 250.00	4.900	\$1,225.00	3.5	\$878.00						
4/30/2024	AB	Review and correct billing entries; continue cross-check with public folder and filings	\$ 250.00	1.200	\$300.00	1.00	\$250.00						
5/10/2024	MO	Review and reduce billing entries	\$ 1,050.00	0.500	\$525.00	0.50	\$1,050.00						
TOTAL													
		Total Lodestar		88.450	\$86,257.50								
		Lodestar Reductions			-\$2,805.50	6.26	2491	1					
						Perct	100%	30%					
						Subt	6.26	2491	0.3				
						General	6.26	\$2,491					
						CC Confs	0.3	\$ 315.00					
						Total	6.56	2,805.50					
		Net Lodestar			\$83,452.00								

STEBNER

Stebner Gertler & Guadagni - Lodestar Fees/Costs

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	3/14/2016	Kelly Knapp (KK)	Drafted email to potential class rep re complaint	0.10		\$590.00								
	3/14/2016	KK	Call with KAS re potential class rep and complaint allegations	0.10		\$590.00								
	3/14/2016	Kathryn Stebner (KAS)	Call with KK re potential class rep and complaint allegations	0.10		\$795.00								
	3/14/2016	KAS	Review draft email to potential class rep re complaint	0.20		\$795.00								\$159.00
	4/27/2016	KAS	Email to KAS re Sunrise REIT	0.30		\$795.00			0.3	238.5				\$238.50
	5/17/2016	KAS	Review email from GK re Aegis letters to San Rafael residents re Sunrise.	0.30		\$795.00								\$238.50
	7/21/2016	KK	Sunrise - telephone conference w/ KAS and GK re potential claims	0.20		\$590.00								\$118.00
	7/21/2016	George Kawamoto (GK)	Sunrise - telephone conference w/KAS and KK re potential claims	0.20		\$475.00								\$95.00
	7/21/2016	KAS	Sunrise - telephone conference w/KK and GK re potential claims	0.20		\$795.00								\$159.00
	7/26/2016	KAS	Sunrise - telephone call w/ potential class rep re potential claims/complaint	0.40		\$795.00								\$318.00
	7/26/2016	KK	Sunrise - telephone call w/ potential class rep re potential claims/complaint	0.40		\$590.00								\$236.00
	8/1/2016	KK	Drafted letter to Sunrise facility re monthly statements and emailed draft to client	0.30		\$590.00								\$177.00
	8/2/2016	KK	Sunrise - phone call with potential class rep	0.10		\$590.00								\$59.00
	8/2/2016	KK	Drafted letter to Sunrise facility billing dept.	0.10		\$590.00								\$59.00
	9/12/2016	KK	Email to CH and MT re status of document review, etc. re new client	0.30		\$590.00								\$177.00
	9/13/2016	KK	Client interview re background facts	1.10		\$590.00								\$649.00
	9/13/2016	KK	Prepared for client interview	0.10		\$590.00								\$59.00
	9/13/2016	KK	Memo and email to team summarizing client call	0.60		\$590.00								\$354.00
	9/13/2016	KAS	Review KK memo and email to team summarizing client call	0.60		\$795.00								\$477.00
	9/14/2016	KAS	Review KK memo and email to team summarizing call	0.60		\$795.00			0.6	477				\$477.00
	9/20/2016	KK	Email re client medical records request	0.20		\$590.00								\$118.00
	9/20/2016	KK	Memo re strategy and emailed co-counsel re same	0.30		\$590.00								\$177.00
	9/20/2016	KK	Further edits to memo re strategy and emailed co-counsel re same	0.30		\$590.00			0.3	177				\$177.00
	9/20/2016	KK	Client medical records request	0.20		\$590.00			0.2	118				\$118.00
	9/22/2016	KK	Reviewed client documents	0.40		\$590.00								\$236.00
	12/12/2016	KK	Reviewed client records and summarized in a memo	1.90		\$590.00								\$1,121.00
	12/29/2016	KK	Drafted memo re care levels and emailed team re same	0.70		\$590.00								\$413.00
	1/4/2017	KK	Drafted letter to counsel re getting records	0.60		\$590.00								\$354.00
	1/5/2017	KK	Conference call w/ GK, KAS, and CH re strategy	0.40		\$590.00								\$236.00
	1/5/2017	KAS	Conference call with GK, KK, and CH re strategy	0.40		\$795.00								\$318.00
	1/5/2017	GK	Call with KAS - prep for strategy conf call	0.10		\$475.00			0.1	47.5				\$47.50
	1/5/2017	GK	Conference call with KAS, CH, and KK re strategy	0.40		\$475.00			0.4	190				\$190.00
	1/5/2017	GK	Memo - summary of conference call re strategy	0.20		\$475.00			0.2	95				\$95.00
	1/8/2017	GK	Research defendants' CA RCFE facilities and corresponding venues	1.50		\$475.00								\$712.50
	1/8/2017	GK	Memo summarizing research defendants' CA RCFE facilities and corresponding venues	1.00		\$475.00								\$475.00
	1/9/2017	KAS	Call with GK and KK re defendants' CA RCFE facilities and corresponding venues	0.20		\$795.00								\$159.00
	1/9/2017	KK	Call with KAS and GK re defendants' CA RCFE facilities and corresponding venues	0.20		\$590.00			0.2	118				\$118.00

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
		Call with KAS and KK re defendants' CA RCFE facilities and corresponding venues	0.20	\$475.00		\$95.00								
1/10/2017	KK	TC w/ attorney re possible class case	0.30	\$590.00		\$177.00								
1/10/2017	KK	Reviewed resident file	0.70	\$590.00		\$413.00								
1/10/2017	KK	Reviewed DSS records	0.40	\$590.00		\$236.00								
1/10/2017	KK	Investigation re staffing representations	1.20	\$590.00		\$708.00								
1/10/2017	KK	TC w/ client re getting records	0.30	\$590.00		\$177.00								
1/10/2017	GK	TC re possible class case	0.50	\$475.00		\$237.50								
1/10/2017	GK	Review docs (resident file, DSS records) re potential class case	0.90	\$475.00		\$427.50								
1/10/2017	GK	Emails w/ co-counsel re possible class case	0.40	\$475.00		\$190.00								
1/11/2017	KK	TC w/ KAS and GK re investigation status / class action	0.30	\$590.00		\$177.00								
1/11/2017	KAS	TC w/ KK and GK re investigation status / class action	0.30	\$795.00		\$238.50								
1/11/2017	GK	TC w/ KAS and KK re investigation status / class action	0.30	\$475.00		\$142.50								
1/12/2017	KK	Legal research re commonality and damages	1.80	\$590.00		\$1,062.00								
1/13/2017	KK	TC w/ daughter of former resident	0.80	\$590.00		\$472.00								
1/17/2017	KK	TC w/ residents re problems receiving care	0.80	\$590.00		\$472.00								
1/17/2017	KK	Analyzed client's billing statements and drafted memorandum	0.70	\$590.00		\$413.00								
1/18/2017	KK	Analyzed billing records of resident and drafted memo	1.10	\$590.00		\$649.00								
1/18/2017	KK	Drafted memo re former resident interviews	0.70	\$590.00		\$413.00								
1/19/2017	KAS	Phone call w/ CH, GK, and KK re strategy for further investigation and information needed to file	0.70	\$795.00		\$556.50								
1/19/2017	KK	Phone call w/ CH, GK, and KS re strategy for further investigation and information needed to file	0.70	\$590.00		\$413.00								
1/19/2017	GK	Phone call w/ CH, KK, and KS re strategy for further investigation and information needed to file	0.70	\$475.00		\$332.50								
1/19/2017	KK	Legal research re communication w/ current employee before litigation	0.90	\$590.00		\$531.00			0.9	531				
1/20/2017	KK	Email to CH and KS re current communications w. employee	0.20	\$590.00		\$118.00								
1/20/2017	KK	TC w. former resident re care	1.10	\$590.00		\$649.00								
1/20/2017	KK	TC w/ former resident re care at Bay Area Sunrise facility	0.50	\$590.00		\$295.00								
1/20/2017	KAS	Email with CH and KK re current communication w. employee	0.20	\$795.00		\$159.00								
1/23/2017	KK	TC w/ family of former resident	0.20	\$590.00		\$118.00								
1/23/2017	KK	Drafted letter re investigation to former resident	0.50	\$590.00		\$295.00								
1/24/2017	KK	Research into Sunrise policies and practices	1.00	\$590.00		\$590.00								
1/26/2017	KK	TC w/ family member re POA for resident	0.30	\$590.00		\$177.00								
1/26/2017	KK	Interviewed potential named plaintiff	0.40	\$590.00		\$236.00								
1/27/2017	KK	TC w/ former employee	1.00	\$590.00		\$590.00								
1/27/2017	KK	Drafted memo to team re staffing	0.70	\$590.00		\$413.00								
1/27/2017	KAS	Review KK memo re staffing	0.30	\$795.00		\$238.50								
1/30/2017	KK	TC w/ current resident re complaints	0.80	\$590.00		\$472.00								
2/1/2017	KAS	TC w/ CH and KK re strategy	0.30	\$795.00		\$238.50								
2/1/2017	KK	TC w/ CH and KAS re strategy	0.30	\$590.00		\$177.00								
2/1/2017	KK	TC w/ KAS and GK re investigation	0.30	\$590.00		\$177.00								
2/1/2017	GK	TC w/ KAS and KK re investigation	0.30	\$475.00		\$142.50								
2/1/2017	KAS	TC w/ KK and GK re investigation	0.30	\$795.00		\$238.50								
2/7/2017	KK	Research re possible Sunrise claims	0.60	\$590.00		\$354.00								
2/9/2017	KK	Drafted class action complaint	1.20	\$590.00		\$708.00								
2/10/2017	KK	Investigation - former employees	1.00	\$590.00		\$590.00								
2/10/2017	KK	TC w/ potential plaintiff	0.20	\$590.00		\$118.00								
2/10/2017	KK	Drafted email to potential plaintiff	0.20	\$590.00		\$118.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg	Travel		
					Worked	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	2/10/2017	KAS	Met w/ KK and consultants re strategy	1.50	\$795.00	\$1,192.50								
	2/10/2017	KAS	Review draft complaint	1.50	\$795.00	\$1,192.50								
	2/10/2017	KK	Met w/ KAS and consultants re strategy	1.50	\$590.00	\$885.00								
	2/13/2017	KK	Drafted complaint	1.00	\$590.00	\$590.00								
	2/13/2017	KK	TC w/ KAS re potential class reps - status/retention	0.20	\$590.00	\$118.00								
	2/13/2017	KK	Drafted email to potential class rep	0.20	\$590.00	\$118.00								
	2/13/2017	KK	Prepared for meeting with KAS re status/retention of potential class reps	0.50	\$590.00	\$295.00								
	2/13/2017	KAS	TC w/ KK re potential class reps - status/retention	0.20	\$795.00	\$159.00								
	2/13/2017	KK	Contacted potential class reps	0.60	\$590.00	\$354.00								
	2/14/2017	KK	Drafted complaint	3.20	\$590.00	\$1,888.00								
	2/16/2017	KK	TC w/ potential named plaintiff and drafted email to same	0.40	\$590.00	\$236.00								
	2/16/2017	KK	Drafted complaint	0.20	\$590.00	\$118.00								
	2/17/2017	KK	TC w/ potential named plaintiff re investigation	0.20	\$590.00	\$118.00								
	2/17/2017	KK	Drafted email to same re investigation	0.20	\$590.00	\$118.00								
	2/17/2017	KK	Emails to potential named plaintiff re investigation	0.20	\$590.00	\$118.00								
	2/17/2017	KK	Emails to potential named plaintiff re investigation	0.20	\$590.00	\$118.00								
	2/21/2017	KK	TC w/ potential named plaintiffs re investigation	0.50	\$590.00	\$295.00								
	2/21/2017	KK	Reviewed memo from ethics consultant	0.20	\$590.00	\$118.00			0.2	118				
	2/21/2017	KK	TC w/ former LVN re staffing	0.50	\$590.00	\$295.00								
	2/22/2017	KK	Reviewed email correspondence from potential named plaintiff	0.30	\$590.00	\$177.00								
	2/22/2017	KK	Drafted email to potential named plaintiff re investigation	0.10	\$590.00	\$59.00								
	2/24/2017	KK	Drafted complaint and emailed CH re same	0.40	\$590.00	\$236.00								
	3/1/2017	KK	Email to client re meeting on Friday	0.10	\$590.00	\$59.00								
	3/3/2017	KK	Travel to/from meeting w/ potential named plaintiffs	7.50	\$590.00	\$4,425.00							7.5	
	3/3/2017	KK	Meeting w/ potential named plaintiffs	2.50	\$590.00	\$1,475.00								
	3/6/2017	KAS	Met w/ KK re potential class reps	0.20	\$795.00	\$159.00								
	3/6/2017	KK	Drafted letter re failure to produce records	0.90	\$590.00	\$531.00								
	3/6/2017	KK	Reviewed emails from CH and KAS re records	0.10	\$590.00	\$59.00								
	3/6/2017	KK	Met w/ KAS re potential class reps	0.20	\$590.00	\$118.00								
	3/6/2017	KAS	Reviewed emails from KK re records	0.10	\$795.00	\$79.50								
	3/7/2017	KAS	Reviewed/drafted emails w/ KK re potential named plaintiffs	0.20	\$795.00	\$159.00								
	3/7/2017	KK	Reviewed potential client's intake docs from Sunrise	0.70	\$590.00	\$413.00								
	3/7/2017	KK	Reviewed/drafted emails w/ KAS re potential named plaintiffs	0.20	\$590.00	\$118.00								
	3/7/2017	KK	Drafted/revised letter to counsel re records	0.30	\$590.00	\$177.00								
	3/7/2017	KAS	Reviewed/drafted emails w/ KK re potential named plaintiffs.	0.20	\$795.00	\$159.00								
	3/8/2017	KK	Reviewed documents in preparation for client interviews	0.90	\$590.00	\$531.00								
	3/8/2017	KK	Reviewed DSS records	0.40	\$590.00	\$236.00								
	3/8/2017	KK	Drafted complaint	1.20	\$590.00	\$708.00								
	3/9/2017	KK	Travel to/from meeting w/ potential class rep in Orange County	10.20	\$590.00	\$6,018.00							10.2	
	3/9/2017	KK	Meeting w/ potential class rep in Orange County	3.00	\$590.00	\$1,770.00								
	3/10/2017	KAS	Met w/ KK to discuss client interviews	0.20	\$795.00	\$159.00			0.2	159				
	3/10/2017	KK	Drafted memo re client interview	1.00	\$590.00	\$590.00								
	3/10/2017	KK	Review memo	0.20	\$590.00	\$118.00			0.2	188				
	3/10/2017	KK	Meeting w/ KAS re strategy on draft complaint following potential client interviews	0.70	\$590.00	\$413.00								
	3/10/2017	KK	Tc w/ potential class rep and follow-up email	0.60	\$590.00	\$354.00								
	3/10/2017	KAS	Meeting w/ KK re strategy on draft complaint following potential client interviews	0.70	\$795.00	\$556.50								
	3/10/2017	KK	Met w/ KAS to discuss client interviews	0.20	\$590.00	\$118.00			0.2	118				

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	3/13/2017	KK	Reviewed notes and prepared for client interview	0.20	\$590.00	\$118.00			0.2	118				
	3/13/2017	KK	Met w/ KAS to discuss litigation strategy and drafted email to the team re same	0.30	\$590.00	\$177.00								
	3/13/2017	KAS	Met w/ KK to discuss litigation strategy	0.20	\$795.00	\$159.00								
	3/13/2017	KK	Travel to/from meeting with potential class rep	3.00	\$590.00	\$1,770.00								3
	3/13/2017	KK	Meeting with potential class rep	1.80	\$590.00	\$1,062.00								
	3/15/2017	KK	Drafted email to CH re contract	0.20	\$590.00	\$118.00								
	3/15/2017	KAS	Met w/ KK, GK, and CANHR re Sunrise contract	0.50	\$795.00	\$397.50								
	3/15/2017	GK	Met w/ KAS, KK, and CANHR re Sunrise contract	0.50	\$475.00	\$237.50			0.5	237.5				
	3/15/2017	KK	Met w/ KAS, GK, and CANHR re Sunrise contract	0.50	\$590.00	\$295.00			0.5	237.5				
	3/21/2017	KAS	Meet w/ internal team to discuss strategy	0.40	\$795.00	\$318.00					0.4	318		
	3/21/2017	GK	Meet w/ internal team to discuss strategy	0.40	\$475.00	\$190.00					0.4	475		
	3/21/2017	KK	Meet w/ internal team to discuss strategy (and KAS and GK)	0.40	\$590.00	\$236.00					0.4	590		
	3/21/2017	KK	Drafted email to team re litigation strategy	0.10	\$590.00	\$59.00								
	3/22/2017	KK	Drafted email to potential class rep	0.10	\$590.00	\$59.00								
	3/23/2017	KK	Reviewed client documents and researched staffing	0.80	\$590.00	\$472.00								
	3/29/2017	KK	TC w/ potential class rep re documents	0.20	\$590.00	\$118.00								
	3/31/2017	KK	TC w/ CH re potential staffing-based theories	0.20	\$590.00	\$118.00								
	4/3/2017	KK	Drafted letter to DSS re missing public records	0.80	\$590.00	\$472.00								
	4/4/2017	KK	Met w/ KR to discuss PRA requests	0.30	\$590.00	\$177.00								
	4/4/2017	KR	Met w/ KK to discuss PRA requests	0.30	\$375.00	\$112.50			0.3	112.5				
	4/10/2017	KK	Met w/ SP re PRA request language	0.40	\$590.00	\$236.00			0.4	236				
	4/10/2017	SP	Met w/ KK re PRA request language	0.40	\$150.00	\$60.00			0.4	60				
	4/13/2017	KK	Met w/ KAS re strategy to obtain additional information for complaint / status of PRA requests	0.10	\$590.00	\$59.00								
	4/13/2017	KK	Met w/ KK re strategy to obtain additional information for complaint / status of PRA requests	0.10	\$795.00	\$79.50								
	4/13/2017	KAS	/ status of PRA requests	0.10	\$795.00	\$79.50								
	4/26/2017	KK	Drafted complaint	1.20	\$590.00	\$708.00								
	4/26/2017	KK	TC w/ potential class rep	0.20	\$590.00	\$118.00								
	5/2/2017	KK	TC w. CH re complaint	0.40	\$590.00	\$236.00								
	5/2/2017	KK	Drafted emails to potential reps re retainers	0.20	\$590.00	\$118.00			0.2	118				
	5/5/2017	KAS	Met w/ KAS re potential class reps	0.20	\$795.00	\$159.00								
	5/5/2017	KK	TC w. potential class rep re complaint	0.40	\$590.00	\$236.00								
	5/5/2017	KK	Met w/ KAS re potential class reps	0.20	\$590.00	\$118.00								
	5/5/2017	KK	Drafted complaint	3.60	\$590.00	\$2,124.00								
	5/9/2017	KK	Drafted complaint	1.00	\$590.00	\$590.00								
	5/9/2017	KK	Drafted complaint	1.20	\$590.00	\$708.00								
	5/10/2017	KK	Drafted complaint	2.50	\$590.00	\$1,475.00								
	5/10/2017	KK	TC w/ potential class rep re complaint	0.10	\$590.00	\$59.00								
	5/11/2017	KK	Drafted complaint	1.50	\$590.00	\$885.00								
	5/11/2017	KK	Drafted complaint	0.40	\$590.00	\$236.00								
	5/15/2017	KK	Contacted CCL re PRA request	0.20	\$590.00	\$118.00								
	5/15/2017	KK	Travel to/from meeting with class rep re complaint	2.00	\$590.00	\$1,180.00								2
	5/15/2017	KK	Meeting with class rep re complaint	1.00	\$590.00	\$590.00								
	5/15/2017	KK	Drafted complaint	0.20	\$590.00	\$118.00								
	5/15/2017	KK	Prepared for class rep meeting and interview	0.40	\$590.00	\$236.00								
	5/15/2017	KK	Drafted complaint	0.70	\$590.00	\$413.00								
	5/16/2017	KK	Drafted complaint	0.30	\$590.00	\$177.00								
	5/16/2017	KK	TC w/ CCL re response to PRA requests	0.50	\$590.00	\$295.00								
	5/18/2017	KK	TC w/ potential class rep and follow-up email re same	0.20	\$590.00	\$118.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	5/22/2017	KK	TC w/ KAS re complaint - update on status and target for filing	0.20	\$590.00	\$118.00								
	5/22/2017	KAS	TC w/ KK re complaint - update on status and target for filing	0.20	\$795.00	\$159.00								
	5/22/2017	KK	Drafted complaint	0.80	\$590.00	\$472.00								
	5/22/2017	KK	TC w/ potential class rep re retainer	0.10	\$590.00	\$59.00			0.1	59				
	5/23/2017	KK	Drafted complaint	0.50	\$590.00	\$295.00								
	5/23/2017	KK	Drafted email to potential class rep re retainer	0.20	\$590.00	\$118.00			0.2	118				
	5/23/2017	KK	Reviewed docs	1.30	\$590.00	\$767.00								
	5/23/2017	KK	Drafted complaint	1.00	\$590.00	\$590.00								
	5/24/2017	KK	Drafted complaint	0.30	\$590.00	\$177.00								
	5/24/2017	KK	Drafted complaint	0.20	\$590.00	\$118.00								
	5/24/2017	KK	Drafted complaint	0.10	\$590.00	\$59.00								
	5/24/2017	KK	Drafted complaint	0.20	\$590.00	\$118.00								
	5/25/2017	KAS	Reviewed draft complaint and CLRA letter	1.10	\$795.00	\$874.50								
	5/25/2017	KAS	Call with KK re draft complaint and CLRA letter	0.70	\$795.00	\$556.50								
	5/25/2017	KK	Drafted complaint	2.50	\$590.00	\$1,475.00								
	5/25/2017	KK	Drafted CLRA letter	0.40	\$590.00	\$236.00								
	5/25/2017	KK	Drafted email to co-counsel re complaint and CLRA letter	0.10	\$590.00	\$59.00								
	5/26/2017	KK	TC w/ class rep's conservatorship lawyer	0.20	\$590.00	\$118.00			0.2	118				
	5/31/2017	KK	Revised CLRA letter	0.30	\$590.00	\$177.00								
	5/31/2017	KK	Drafted declarations for complaint	0.90	\$590.00	\$531.00								
	5/31/2017	KK	TC w/ potential class rep and follow up re same	0.70	\$590.00	\$413.00								
	6/13/2017	KK	Drafted email to class rep re successor-in-interest declaration	0.10	\$590.00	\$59.00								
	6/13/2017	KK	Revised complaint and emailed team re same	1.30	\$590.00	\$767.00								
	6/15/2017	KK	Research re defendant's corporate status	0.40	\$590.00	\$236.00								
	6/19/2017	KK	Drafted email to KAS re class rep	0.20	\$590.00	\$118.00								
	6/19/2017	KAS	KK email re class rep	0.20	\$795.00	\$159.00								
	6/19/2017	KK	TC w/ named plaintiff re complaint	0.10	\$590.00	\$59.00								
	6/20/2017	KK	Revised Sunrise complaint and emailed class rep re same	0.20	\$590.00	\$118.00								
	6/22/2017	KK	TC w/ KAS re complaint and communications with class rep re same	0.20	\$590.00	\$118.00								
	6/22/2017	KAS	TC w/ KK re complaint and communications with class rep re same	0.20	\$795.00	\$159.00								
	6/23/2017	KK	TC w/ class rep re complaint	0.20	\$590.00	\$118.00								
	6/26/2017	KAS	Reviewed revised complaint and CLRA letter	0.70	\$795.00	\$556.50								
	6/26/2017	KAS	Call with KK re revised complaint and CLRA letter	0.10	\$795.00	\$79.50			0.1	79.5				
	6/26/2017	KK	Revised complaint	0.60	\$590.00	\$354.00								
	6/26/2017	KK	Call with KAS re revised complaint and CLRA letter	0.10	\$590.00	\$59.00			0.1	59				
	6/26/2017	KK	Finalized complaint for filing	0.10	\$590.00	\$59.00								
	6/26/2017	KK	Reviewed class rep's relevant documents	0.40	\$590.00	\$236.00								
	6/27/2017	KK	Drafted memo re Sunrise facilities	0.80	\$590.00	\$472.00								
	6/28/2017	KAS	Texts w/C. Lee	0.10	\$795.00	\$79.50								
	6/29/2017	KK	Drafted email to class rep re complaint	0.10	\$590.00	\$59.00								
	6/29/2017	KK	Drafted email to co-counsel re investigation	0.20	\$590.00	\$118.00								
	6/29/2017	KK	Drafted email to co-counsel re investigation	0.10	\$590.00	\$59.00			0.1	59				
	6/29/2017	KAS	Extension calls and texts w/C. Lee	0.30	\$795.00	\$238.50								
	6/30/2017	KAS	Emails and texts re: C. Lee and ads	0.20	\$795.00	\$159.00								
	6/30/2017	KAS	Review memos re staffing and facilities	0.70	\$795.00	\$556.50								
	6/30/2017	KAS	Extension texts and calls w/C. Lee	0.50	\$795.00	\$397.50								
	7/3/2017	KK	Drafted email to co-counsel re investigation	0.10	\$590.00	\$59.00								
	7/3/2017	KK	TC w/ class rep re arbitration	0.10	\$590.00	\$59.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
7/10/2017	KK	Legal research re liquidated damages	1.90	\$590.00		\$1,121.00								
7/10/2017	KK	TC w/ potential witness re staffing	0.60	\$590.00		\$354.00								
7/13/2017	KK	TC w/ potential class rep	0.30	\$590.00		\$177.00								
7/13/2017	KK	TC w/ witness re staffing	0.10	\$590.00		\$59.00								
7/13/2017	KK	Met w/ paralegal to discuss investigation	0.10	\$590.00		\$59.00								
7/17/2017	KAS	Texts and calls w/C. Lee	0.10	\$795.00		\$79.50								
7/17/2017	KK	Travel to/from meeting with potential class rep	1.60	\$590.00		\$944.00								1.6
7/17/2017	KK	Meeting with potential class rep	1.70	\$590.00		\$1,003.00								
7/17/2017	KAS	KK email re settlement meeting w/ C. Lee	0.20	\$795.00		\$159.00								
7/17/2017	KK	Drafted email to KAS re settlement meeting w/ C. Lee	0.30	\$590.00		\$177.00								
7/18/2017	KAS	Texts and Calls w/C. Lee	0.20	\$795.00		\$159.00								
7/18/2017	KK	Prepared for meeting w/ C. Lee	1.00	\$590.00		\$590.00								
7/19/2017	KK	Meeting w/ KAS and GK re settlement meeting	0.20	\$590.00		\$118.00		0.2	118					
7/19/2017	KAS	Meeting with KK and GK	0.70	\$795.00		\$556.50								
7/19/2017	KAS	Review docs in connection with settlement meeting	0.30	\$795.00		\$238.50								
7/19/2017	KAS	Call with co counsel regarding settlement and tactics.	0.20	\$795.00		\$159.00								
7/19/2017	GK	Review docs in connection with settlement meeting	1.80	\$475.00		\$855.00		1.8	855					
7/19/2017	GK	Meeting with KAS and email	0.70	\$475.00		\$332.50								
7/19/2017	GK	Call with co-counsel regarding settlement and tactics.	0.20	\$475.00		\$95.00		0.2	95					
7/20/2017	KK	Drafted amended complaint	0.50	\$590.00		\$295.00								
7/21/2017	KK	Drafted amended complaint	0.80	\$590.00		\$472.00								
7/21/2017	KAS	Review letter from defense	0.20	\$795.00		\$159.00								
7/21/2017	KK	TC w/ witness re staffing	0.30	\$590.00		\$177.00								
7/24/2017	KK	TC w/ KAS, CH, and SC to prep for meeting with C. Lee	0.30	\$590.00		\$177.00		0.3	177					
7/24/2017	KK	Met w/ KAS re CLRA response letter and sent email to team re same	0.40	\$590.00		\$236.00								
7/24/2017	KK	TC w/ witness re staffing	0.90	\$590.00		\$531.00								
7/24/2017	KK	Prepared for settlement meeting with C. Lee	0.50	\$590.00		\$295.00		0.5	295					
7/24/2017	KK	Calls with individual co counsel and KK re settlement meeting with C. Lee												
7/24/2017	KAS	Lee	1.20	\$795.00		\$954.00								
7/24/2017	KAS	Memo	0.70	\$795.00		\$556.50								
7/24/2017	KAS	Prep for meeting with C. Lee	2.60	\$795.00		\$2,067.00								
7/24/2017	KAS	Meeting w/C. Lee	1.50	\$795.00		\$1,192.50								
7/24/2017	KK	Met w/ KAS re Sunrise meeting with C. Lee and emailed team re same	0.40	\$590.00		\$236.00		0.4	236					
7/25/2017	KK	Drafted evidence preservation letter	0.50	\$590.00		\$295.00								
7/26/2017	KK	Drafted client evidence preservation letters	0.20	\$590.00		\$118.00		0.2	118					
7/26/2017	KK	Investigated and reviewed online complaints re staffing	0.00	\$590.00		\$0.00								
7/26/2017	KK	Drafted email to witness re staffing	0.90	\$590.00		\$531.00								
7/27/2017	KK	Drafted email to witness re staffing	0.10	\$590.00		\$59.00								
7/27/2017	KK	Consult w/ expert re standing for successor-in-interest	0.30	\$590.00		\$177.00								
7/27/2017	KAS	TC w/ KK and co-counsel re status	0.20	\$795.00		\$159.00				0.2	159			
7/27/2017	KK	TC w/ class rep re arbitration agreement	0.30	\$590.00		\$177.00								
7/27/2017	KK	TC w/ KAS and co-counsel re status	0.20	\$590.00		\$118.00				0.2	118			
7/27/2017	KK	TC w/ KAS re letter to C. Lee	0.10	\$590.00		\$59.00		0.1	59					
7/27/2017	KAS	TC w/ KK re letter to C. Lee	0.10	\$795.00		\$79.50		0.1	79.5					
7/28/2017	KK	TC w/ witness re staffing	0.10	\$590.00		\$59.00								
7/31/2017	KK	TC w/ witnesses re staffing	0.60	\$590.00		\$354.00								
8/2/2017	KK	Drafted emails to CANHR for investigation	0.30	\$590.00		\$177.00		0.3	177					
8/2/2017	KK	TC w/ witness re staffing	0.10	\$590.00		\$59.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	8/3/2017	KAS	Letter and texts w/C. Lee	0.40	\$795.00	\$318.00								
	8/7/2017	KK	TC w/ potential class rep re staffing	1.10	\$590.00	\$649.00								
	8/8/2017	KK	TC w/ KAS and C. Lee re early settlement negotiations	0.30	\$590.00	\$177.00								
	8/8/2017	KK	Drafted memo re call with C. Lee	0.20	\$590.00	\$118.00								
	8/8/2017	KK	Investigated former EDs	0.20	\$590.00	\$118.00								
	8/8/2017	KAS	Call with C. Lee	0.20	\$795.00	\$159.00								
	8/8/2017	KAS	Prep with Kelly re call with C. Lee	0.30	\$795.00	\$238.50								
	8/9/2017	KK	Drafted email to witness re staffing	0.10	\$590.00	\$59.00								
	8/9/2017	KK	TC w/ former ED of Sunrise facility re staffing	0.70	\$590.00	\$413.00								
	8/9/2017	KK	Drafted EOT to serve complaint	0.30	\$590.00	\$177.00								
	8/9/2017	KK	Reviewed emails from co-counsel re Sunrise negotiations	0.10	\$590.00	\$59.00								
	8/10/2017	KK	Legal research notice requirements, and drafted declaration to support ex parte application to extend time for service	0.70	\$590.00	\$413.00								
	8/14/2017	KK	TC w/ co-counsel re complaint	0.60	\$590.00	\$354.00					0.6		354	
	8/14/2017	KK	TC w/ KAS and defense n re exchange of information	0.20	\$590.00	\$118.00								
	8/14/2017	KK	Drafted email to C. Lee re EOT for service of pleadings	0.20	\$590.00	\$118.00								
	8/14/2017	KK	Revised declaration ISO EOT to serve complaint	0.20	\$590.00	\$118.00								
	8/14/2017	KAS	Reviewed draft email to C. Lee re EOT for service of pleadings	0.20	\$795.00	\$159.00								
	8/14/2017	KAS	TC w/ KK and defense re exchange of information	0.20	\$795.00	\$159.00								
	8/15/2017	KK	Reviewed rules re complex determination hearings	0.20	\$590.00	\$118.00			0.2	118				
	8/16/2017	KK	Drafted email to investigator re former employees	0.20	\$590.00	\$118.00								
	8/18/2017	KK	Drafted letter to class rep to update	0.20	\$590.00	\$118.00								
	8/18/2017	KK	Reviewed CCL Records	1.20	\$590.00	\$708.00								
	8/30/2017	KK	TC w/ potential new class rep	1.00	\$590.00	\$590.00								
	9/1/2017	KK	TC w/ former employee re staffing	0.70	\$590.00	\$413.00								
	9/1/2017	KK	Call with KAS in advance of call with former employee re staffing	0.30	\$590.00	\$177.00			0.3	177				
	9/1/2017	KAS	Call with KK in advance of call with former employee re staffing	0.30	\$795.00	\$238.50								
	9/1/2017	KAS	Call with KK and former employee re staffing	0.50	\$795.00	\$397.50								
	9/1/2017	KAS	Call with Arns re former employee interview	0.10	\$795.00	\$79.50								
	9/5/2017	KAS	Calls with witness - staffing investigation	0.70	\$795.00	\$556.50								
	9/5/2017	KAS	Calls with KK re staffing investigation witness calls	0.40	\$795.00	\$318.00								
	9/5/2017	KAS	Calls with individual co counsel re staffing investigation witness calls	0.40	\$795.00	\$318.00								
	9/5/2017	KK	Drafted email to ethics expert re witness contacts	0.20	\$590.00	\$118.00			0.2	118				
	9/5/2017	KK	Drafted email to resident re right of access to records	0.20	\$590.00	\$118.00								
	9/5/2017	KK	TC w/ KAS and ethics expert re witness contacts	0.30	\$590.00	\$177.00			0.3	177				
	9/5/2017	KK	TC w/ witness re staffing	0.30	\$590.00	\$177.00								
	9/6/2017	KK	Drafted email to witness re staffing	0.20	\$590.00	\$118.00								
	9/7/2017	KK	TC w/ witness re staffing in Bay Area Sunrise facility	0.30	\$590.00	\$177.00								
	9/7/2017	KK	Drafted amended complaint	0.30	\$590.00	\$177.00								
	9/11/2017	KK	Drafted email to witness re staffing	0.10	\$590.00	\$59.00								
	9/13/2017	KAS	Calls and texts w/A. Fearn	0.80	\$795.00	\$636.00								
	9/13/2017	KK	Reviewed admission contract and drafted email to potential class rep re same	0.70	\$590.00	\$413.00								
	9/13/2017	KK	TC w/ potential class rep re arbitration	0.20	\$590.00	\$118.00								
	9/14/2017	KAS	Met w/ KK re litigation strategy	0.20	\$795.00	\$159.00			0.2	159				
	9/14/2017	KK	Met w/ KAS re litigation strategy	0.20	\$590.00	\$118.00			0.2	159				
	9/14/2017	KK	Drafted memo to KAS re current status of case	0.60	\$590.00	\$354.00								
	9/14/2017	KAS	Review memo re current status of case	0.20	\$795.00	\$159.00								
	9/15/2017	KAS	Texts w/A. Fearn	0.20	\$795.00	\$159.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	CC Confs Fees	Falkenberg Hrs	Falkenberg Fees	Travel Hrs	Travel Fees
				Worked	Fees	General Hrs	Fees						
Fees													
	9/15/2017 KK	Drafted email to witness re arbitration	0.10	\$590.00	\$59.00								
	9/18/2017 KK	TC w/ potential named plaintiff	0.30	\$590.00	\$177.00								
	9/18/2017 KAS	Prepare for call with defense counsel (J. Schwartz) including call with co-counsel Arns	1.00	\$795.00	\$795.00								
	9/19/2017 KAS	Review memo and witness statements and complaint	1.20	\$795.00	\$954.00			0.3	954				
	9/18/2017 KAS	TC w/KK re call w/Jason Shwartz on 9/20	0.10	\$795.00	\$79.50					0.1		79.5	
	9/18/2017 KK	TC w/ KAS re call w/ Jason Schwartz on 9/20	0.10	\$590.00	\$59.00					0.1		59	
	9/19/2017 KK	Drafted memo for KAS re agenda for call w/ Jason Schwartz	0.70	\$590.00	\$413.00								
	9/20/2017 KK	TC w/ opposing counsel and KAS re negotiations	0.50	\$590.00	\$295.00					0.5		295	
	9/20/2017 KK	Drafted email to team re phone call w/ Jason Schwartz	0.10	\$590.00	\$59.00								
	9/20/2017 KAS	TC w/ opposing counsel and KK re negotiations	0.50	\$795.00	\$397.50								
	9/22/2017 KAS	TC w/KK and team re strategy	0.40	\$795.00	\$318.00					0.4		318	
	9/22/2017 KK	TC w/ KAS and team re strategy	0.40	\$590.00	\$236.00					0.4		236	
	9/22/2017 KAS	Review docs and call with adjuster re settlement	1.10	\$795.00	\$874.50			0.2	874.5				
	9/24/2017 KAS	Call w/Fearn (client) re case status	0.50	\$795.00	\$397.50								
	9/27/2017 KK	Call with KAS and staff re: potential plaintiff and emails	0.50	\$590.00	\$295.00								
	9/27/2017 KAS	Call with Kelly and staff re: potential plaintiff and emails	0.50	\$795.00	\$397.50								
	9/27/2017 LA	Call with KAS and KK re: potential plaintiff and emails	0.50	\$150.00	\$75.00			0.5	75				
	9/28/2017 KK	Drafted ex parte application for extension of time	0.40	\$590.00	\$236.00								
	9/28/2017 KK	TC w/ KAS and opposing counsel re settlement discussions	0.30	\$590.00	\$177.00								
	9/28/2017 KAS	Call w/defense re settlemeny discussions	0.30	\$795.00	\$238.50								
	9/28/2017 KAS	Call w/KK re settlment discussions with defense	0.40	\$795.00	\$318.00			0.4	318				
	9/29/2017 KK	Finalized ex parte application for EOT	0.20	\$590.00	\$118.00								
	9/29/2017 KAS	Emails and calls re meeting w/defense	0.60	\$795.00	\$477.00								
	10/4/2017 KK	Reviewed rules re complex case management conferences and statements	0.50	\$590.00	\$295.00								
	10/4/2017 KK	TC w/ potential class rep.	0.30	\$590.00	\$177.00								
	10/6/2017 KK	Travel to/from meeting with new class rep in San Rafael	1.00	\$590.00	\$590.00								1
	10/6/2017 KK	Meeting with new class rep in San Rafael	1.50	\$590.00	\$885.00								
	10/6/2017 KK	Drafted Sunrise complex CMC statement	1.10	\$590.00	\$649.00								
	10/6/2017 KK	Prepared for meeting with potential class rep	0.30	\$590.00	\$177.00			0.3	177				
	10/9/2017 KK	Drafted application for complex determination hearing	0.20	\$590.00	\$118.00								
	10/12/2017 KAS	Review memos & emails re witnesses	0.50	\$795.00	\$397.50								
	10/13/2017 KK	TC w/ former ED and drafted memo re same	0.90	\$590.00	\$531.00								
	10/16/2017 KK	Prepared for complex determination hearing	0.30	\$590.00	\$177.00								
	10/17/2017 KK	Travel to/from appeared at complex determination hearing	1.70	\$590.00	\$1,003.00								1.7
	10/17/2017 KK	Appeared at complex determination hearing	0.50	\$590.00	\$295.00								
	10/17/2017 KAS	Travel to/from appeared at complex determination hearing	1.70	\$795.00	\$1,351.50								1.7
	10/17/2017 KAS	Appeared at complex determination hearing	0.50	\$795.00	\$397.50								
	10/17/2017 KK	Drafted email to team re meeting w/ Defense Counsel	0.10	\$590.00	\$59.00								
	10/23/2017 KK	Drafted email to another attorney re PMK deposition	0.30	\$590.00	\$177.00								
	10/25/2017 KAS	Meet w KK in advance of meeting with defense next week	0.50	\$795.00	\$397.50								
	10/25/2017 KK	Meet w KAS in advance of meeting with defense next week	0.50	\$590.00	\$295.00			0.5	295				
	10/30/2017 KK	Drafted email to team re meeting on Wednesday	0.40	\$590.00	\$236.00								
	11/1/2017 KK	Prepared for meeting with opposing counsel	0.40	\$590.00	\$236.00			0.4	236				
	11/1/2017 KK	Meeting w/ KAS and co-counsel to prepare for meeting with opposing counsel	1.00	\$590.00	\$590.00					1		590	
	11/1/2017 KK	Reviewed documents and drafted email to team re assessments	0.80	\$590.00	\$472.00								
	11/1/2017 KK	Meeting with KAS and opposing counsel	1.50	\$590.00	\$885.00					1.5		885	
	11/1/2017 KAS	Meeting with defense	1.50	\$795.00	\$1,192.50								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg		Travel	
					Worked	Fees	General Hrs	Fees			Hrs	Fees	Hrs	Fees
	11/1/2017	KAS	Pre-meetings with CH, MT, and KK re approach and questions	1.00	\$795.00	\$795.00					1	795		
	11/1/2017	KAS	Review materials	0.50	\$795.00	\$397.50								
	11/2/2017	KK	Reviewed documents and drafted email to opposing counsel re complaint	0.60	\$590.00	\$354.00								
	11/10/2017	KK	Drafted email to team re next meeting w/ opposing counsel	0.50	\$590.00	\$295.00			0.5	295				
	11/13/2017	KK	Drafted letter to opposing counsel re next meeting	0.50	\$590.00	\$295.00								
	11/15/2017	KK	Drafted ex parte application of time for pleadings	0.50	\$590.00	\$295.00								
	11/16/2017	KK	Reviewed emails from team re settlement negotiations	0.10	\$590.00	\$59.00								
	11/16/2017	KK	Finalized ex parte application for EOT	0.30	\$590.00	\$177.00								
	11/16/2017	KAS	Reviewed emails from team re settlement negotiations.	0.30	\$795.00	\$238.50								
	11/17/2017	KAS	Meeting with plaintiffs attorneys re depositions	1.00	\$795.00	\$795.00					1	795		
	11/17/2017	KK	Meeting with co-counsel re depositions	1.00	\$590.00	\$590.00					1	590		
	11/18/2017	KAS	Sunrise meeting w MT, W. York and associates re sunrise	1.20	\$795.00	\$954.00								
	11/18/2017	KK	Sunrise meeting w KAS, MT, W. York	1.20	\$590.00	\$708.00								
	11/21/2017	KK	Drafted email to co-counsel settlement strategy	0.40	\$590.00	\$236.00								
	11/27/2017	KAS	Reviewed EOT order and met w/ KK	0.20	\$795.00	\$159.00								
	11/27/2017	KK	Sunrise call with CH	0.30	\$590.00	\$177.00					0.3	177		
	11/27/2017	KK	Meet w KAS, GK re status, CMC Statement	0.50	\$590.00	\$295.00								
	11/27/2017	KK	Call w Bob Arns re status	0.30	\$590.00	\$177.00					0.3	177		
	11/27/2017	KAS	Sunrise call with CH re status, CMC Statement	0.30	\$795.00	\$238.50								
	11/27/2017	KAS	Meet w/ KK, GK re CMC Statement	0.50	\$795.00	\$397.50					0.5	397.5		
	11/27/2017	KAS	Call w Bob Arns and emails re status	0.30	\$795.00	\$238.50								
	11/27/2017	KAS	Reviewed CMC Statement	0.80	\$795.00	\$636.00					0.8	636		
	11/27/2017	GK	Sunrise call with CH re status, CMC Statement	0.30	\$475.00	\$142.50					0.3	142.5		
	11/27/2017	GK	Meet w/ KK, KAS re CMC Statement	0.50	\$475.00	\$237.50					0.5	237.5		
	11/27/2017	GK	Call w Bob Arns re status	0.30	\$475.00	\$142.50					0.3	142.5		
	11/27/2017	KK	Reviewed EOT order	0.10	\$590.00	\$59.00					0.1	59		
	11/27/2017	KK	Met w/ KAS	0.10	\$590.00	\$59.00					0.1	59		
	11/27/2017	KK	Drafted CMC Statement	1.00	\$590.00	\$590.00								
	11/29/2017	KK	Drafted email to potential named plaintiff	0.20	\$590.00	\$118.00								
	11/30/2017	KK	TC w/ named plaintiff re GAL application	0.20	\$590.00	\$118.00								
	12/4/2017	KAS	Sunrise call with CH	0.30	\$795.00	\$238.50								
	12/4/2017	KAS	Set up call with attorney W. York	0.20	\$795.00	\$159.00			0.2	159				
	12/4/2017	KAS	Meet with KK and GK re case status and GAL application	0.20	\$795.00	\$159.00								
	12/5/2017	KK	Sunrise call with co counsel re settlement negotiations	0.80	\$590.00	\$472.00					0.5			
	12/5/2017	KK	Meetings with KAS re settlement negotiations	0.10	\$590.00	\$59.00					0.1	59		
	12/5/2017	KK	TC w/ KAS re settlement negotiations	0.10	\$590.00	\$59.00					0.1	59		
	12/5/2017	KAS	Sunrise call with co counsel re settlement negotiations	0.80	\$795.00	\$636.00					0.5			
	12/5/2017	KAS	Meetings with KK re settlement negotiations	0.10	\$795.00	\$79.50					0.1	79.5		
	12/5/2017	KK	TC w/ KAS, CH, and MT re settlement	0.30	\$590.00	\$177.00								
	12/5/2017	KAS	Emails and calls with KK, CH, and MT re settlement negotiations	1.00	\$795.00	\$795.00								
	12/5/2017	KK	Drafted email to KAS, CH, and MT re settlement negotiations	0.50	\$590.00	\$295.00			0.5	295				
	12/6/2017	KAS	Multiple emails w/ co-counsel re meetings with defense re settlement.	0.20	\$795.00	\$159.00								
	12/7/2017	KK	TC w/ named plaintiff re GAL application	0.40	\$590.00	\$236.00								
	12/7/2017	KK	Drafted email to team re litigation strategy	0.10	\$590.00	\$59.00			0.1	59				
	12/8/2017	KAS	Sunrise emails and meet w/ KK	0.50	\$795.00	\$397.50					0.5	397.5		
	12/8/2017	KAS	Call w Bob Arns.	0.30	\$795.00	\$238.50								
	12/8/2017	KK	Drafted Ganz GAL papers	1.80	\$590.00	\$1,062.00								
	12/8/2017	KK	Call with KAS	0.30	\$590.00	\$177.00					0.3	177		

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	12/13/2017	KK	TC w/ KAS and team re litigation strategy	0.50	\$590.00	\$295.00					0.5	295		
	12/13/2017	KAS	TC w/ KK and team re litigation strategy	0.50	\$795.00	\$397.50					0.5	295		
	12/13/2017	KK	Reviewed file and emailed team re evidence	2.10	\$590.00	\$1,239.00								
	12/20/2017	KAS	Reviewed email from KK re amending complaint	0.20	\$795.00	\$159.00								
	12/20/2017	KK	Drafted email to CH and KAS re amending complaint	0.20	\$590.00	\$118.00								
	12/27/2017	KAS	Reviewed memo re meeting on 11/1/17 and emailed team re same	0.50	\$795.00	\$397.50								
	12/27/2017	KK	Drafted memo re meeting on 11/1/17 and emailed team re same	0.90	\$590.00	\$531.00								
	1/9/2018	KAS	Sunrise call with CH and review status	0.40	\$795.00	\$318.00								
	1/17/2018	KK	Drafted email to named plaintiff re amending complaint	0.20	\$590.00	\$118.00								
	1/18/2018	KAS	Sunrise call with co counsel regarding case status and tactics	0.10	\$795.00	\$79.50					0.1	79.5		
	1/18/2018	KAS	Review arbitration issue and emails re same	0.80	\$795.00	\$636.00								
	1/23/2018	KAS	Reviewed memo re arbitration	1.50	\$795.00	\$1,192.50								
	1/23/2018	KK	Drafted memo re arbitration	2.30	\$590.00	\$1,357.00								
	2/1/2018	KAS	Sunrise emails and calls w individual co counsel new judge and plans for motions.	0.90	\$795.00	\$715.50					0.9	715.5		
	2/5/2018	KAS	Emails with team regarding motions and new judge and rules	0.20	\$795.00	\$159.00			0.2	159				
	2/5/2018	KAS	Review motion to compel arbitration	0.50	\$795.00	\$397.50								
	2/5/2018	KAS	Sunrise call with individual co counsel re status/strategy	0.70	\$795.00	\$556.50					0.7	556.5		
	2/6/2018	GK	Met w/ KAS and KK re motion to compel arbitration and sent email to group re same	0.40	\$475.00	\$190.00								
	2/6/2018	KK	Met w/ KAS re motion to compel arbitration	0.40	\$590.00	\$236.00			0.4	236				
	2/6/2018	KK	Drafted amended complaint and emailed team re same	0.40	\$590.00	\$236.00								
	2/6/2018	KAS	Read/review defendants motion to compel arbitration	1.70	\$795.00	\$1,351.50								
	2/6/2018	KAS	Calls w/ SC and CH re motion to compel arbitration	0.50	\$795.00	\$397.50								
	2/6/2018	KAS	Meet w/ KK and with GK re tasks related to motion to compel arbitration	0.30	\$795.00	\$238.50			0.3	238.5				
	2/6/2018	KAS	Call w Bob Arns re motion to compel arbitration	0.20	\$795.00	\$159.00								
	2/6/2018	KK	Drafted/reviewed emails to/from KAS re motion to compel arbitration	0.30	\$590.00	\$177.00			0.3	177				
	2/6/2018	KK	Reviewed motion to compel arbitration	0.50	\$590.00	\$295.00			0.5	295				
	2/7/2018	KAS	Call with CH re opposition to mtc arbitration	0.40	\$795.00	\$318.00								
	2/7/2018	KK	TC w/ team, and then KAS re arbitration	0.40	\$590.00	\$236.00					0.4	236		
	2/7/2018	KAS	Review cases in arb motion	1	\$795.00	\$795.00								
	2/7/2018	KAS	Emails regarding new poss rep and emails re motion	0.40	\$795.00	\$318.00								
	2/8/2018	GK	Call with W. York and MT w KAS and KK regarding arbitration	0.50	\$475.00	\$237.50								
	2/8/2018	GK	Review arb agreement and related infomation	1.20	\$475.00	\$570.00								
	2/8/2018	GK	Call with new class rep re arbitration	0.40	\$475.00	\$190.00								
	2/8/2018	KAS	Sunrise call with W. York and MT w/ GK and KK regarding arbitration	0.80	\$795.00	\$636.00								
	2/8/2018	KAS	Review arb agreement and related infomation	0.50	\$795.00	\$397.50								
	2/8/2018	KAS	Call with new class rep re arbitration	0.40	\$795.00	\$318.00								
	2/8/2018	KK	Drafted letter to named plaintiff re amended complaint	0.40	\$590.00	\$236.00								
	2/8/2018	KK	Drafted/reviewed emails to KAS re arbitration	0.10	\$590.00	\$59.00			0.1	59				
	2/8/2018	KK	Drafted emails to named plaintiff re arbitration	0.20	\$590.00	\$118.00								
	2/8/2018	KK	Met w/ KAS to discuss named plaintiffs and arbitration	0.60	\$590.00	\$354.00			0.6	354				
	2/8/2018	KK	Draft Amended complaint	4.00	\$590.00	\$2,360.00								
	2/9/2018	KAS	Sunrise emails to rep and set meeting	0.40	\$795.00	\$318.00								
	2/9/2018	KAS	Calls w KK re meeting with plaintiff/class representative	0.50	\$795.00	\$397.50			0.5	397.5				

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		Falkenberg	Fees	Travel	Fees
					Worked	Fees	General					
							Hrs	Fees				
	2/10/2018	KAS	Sunrise emails w reps to set meetings	0.60	\$795.00	\$477.00						
	2/11/2018	KAS	Meet with GK re complaint	0.50	\$795.00	\$397.50						
	2/11/2018	GK	Call with KAS re amended complaint	0.50	\$475.00	\$237.50						
	2/11/2018	GK	Reviewed draft amended complaint	1.00	\$475.00	\$475.00						
	2/11/2018	KAS	Correspondence with reps re meetings	0.70	\$795.00	\$556.50						
	2/12/2018	KK	TC w/ named plaintiff re complaint	0.10	\$590.00	\$59.00						
	2/12/2018	KAS	Sunrise set meeting w reps	0.90	\$795.00	\$715.50						
	2/12/2018	KAS	Prep call with KK re meeting with Ganz client	2.00	\$795.00	\$1,590.00						
	2/12/2018	GK	TC w/ KAS re possible named plaintiff	0.20	\$475.00	\$95.00						
	2/12/2018	KAS	Sunrise review all Zack records for meeting	2.50	\$795.00	\$1,987.50						
	2/12/2018	KAS	Meet with KK, GK, and other team members re Zack client	0.20	\$795.00	\$159.00						
	2/12/2018	KK	TC w/ CH re amended complaint	0.20	\$590.00	\$118.00						
	2/13/2018	KK	Travel to/from meeting with KAS and class rep at client's home	1.50	\$590.00	\$885.00						1.5
	2/13/2018	KK	Meeting with KAS and class rep at client's home	1.50	\$590.00	\$885.00						
	2/13/2018	KK	Drafted memo re interview with new named plaintiff (A. Fearn)	0.40	\$590.00	\$236.00						
	2/13/2018	KK	Drafted Amended Complaint	1.30	\$590.00	\$767.00						
	2/13/2018	KAS	Meet with KK at class rep home (A. Fearn)	1.50	\$795.00	\$1,192.50						
	2/13/2018	KAS	Travel to/from class rep home for meeting with KK	1.50	\$795.00	\$1,192.50						1.5
	2/13/2018	KAS	Sunrise emails re stip and motion	0.50	\$795.00	\$397.50						
	2/14/2018	KK	Drafted amended complaint	2.70	\$590.00	\$1,593.00						
	2/14/2018	KAS	Sunrise meet w GK and KK and rep mancuso	1.50	\$795.00	\$1,192.50						
	2/14/2018	KAS	Travel to/from meeting with GK, rep mancuso	1.10	\$795.00	\$874.50						1.1
	2/14/2018	KAS	Sunrise emails re stip for pleadings	0.40	\$795.00	\$318.00						
	2/14/2018	KK	Travel to/from meeting with KAS, GK, and named plaintiff (Mancuso)	1.10	\$590.00	\$649.00						1.1
	2/14/2018	KK	Meeting with KAS, GK, and named plaintiff (Mancuso)	1.50	\$590.00	\$885.00						
	2/14/2018	KK	Drafted amended complaint	1.20	\$590.00	\$708.00						
	2/14/2018	KAS	Sunrise review amended draft compliant	0.70	\$795.00	\$556.50						
	2/14/2018	KAS	Call with KK and CH re draft amended complaint	0.50	\$795.00	\$397.50						
	2/14/2018	KK	Travel to/from meeting with KAS, KK, and named plaintiff in El Cerrito	1.10	\$475.00	\$522.50						1.1
	2/14/2018	GK	Meeting with KAS, KK, and named plaintiff in El Cerrito	1.50	\$475.00	\$712.50						
	2/15/2018	KK	TC w/ KAS, GK re arbitration and amended complaint	0.30	\$590.00	\$177.00						
	2/15/2018	KAS	Calls with KK and named plaintiff re arbitration	0.50	\$795.00	\$397.50						
	2/15/2018	KAS	Review docs and prep for TC with KK and named plaintiff re arbitration	0.20	\$795.00	\$159.00						
	2/15/2018	KK	TC w/ named plaintiff and KAS re arbitration	1.20	\$590.00	\$708.00						
	2/15/2018	GK	TC w/ KAS, KK re arbitration and amended complaint	0.30	\$475.00	\$142.50						
	2/15/2018	KAS	Sunrise call with all co counsel re status and tactics	1.10	\$795.00	\$874.50						0.4
	2/15/2018	KAS	call w CH and get stip	0.10	\$795.00	\$79.50						318
	2/16/2018	KK	Reviewed documents and drafted Heredia declaration	1.10	\$590.00	\$649.00						
	2/16/2018	KAS	Sunrise calls w rep re dismissal	0.50	\$795.00	\$397.50						
	2/16/2018	KAS	Emails re stip and cause Heredia stipulation to be filed	0.20	\$795.00	\$159.00						
	2/16/2018	KAS	Review additions to complaint and email to CH re same	0.50	\$795.00	\$397.50						
	2/19/2018	KAS	Sunrise emails and memos re: arb Declaration	0.40	\$795.00	\$318.00						
	2/20/2018	GK	Review EmpRes draft settlement agreement	0.60	\$475.00	\$285.00						
	2/20/2018	GK	Email KAS re review of EmpRes draft settlement agreement	0.30	\$475.00	\$142.50						
	2/20/2018	KK	Draft amended complaint	0.90	\$590.00	\$531.00						
	2/20/2018	KK	Draft amended complaint	0.40	\$590.00	\$236.00						
	2/20/2018	KK	Drafted GAL motion, proposed order, and declaration	2.30	\$590.00	\$1,357.00						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs	Fees						
Fees														
	2/20/2018 KAS	Sunrise review draft amended complaint	0.60	\$795.00	\$477.00				0.1	79.5				
	2/20/2018 KAS	Emails with GK re EmpRes settlement agreement	0.20	\$795.00	\$159.00									
	2/21/2018 KAS	Call with GK and staff re extended briefing schedule	0.10	\$795.00	\$79.50				0.1	79.5				
	2/21/2018 GK	Review docket and status of stipulation	0.10	\$475.00	\$47.50				0.1	79.5				
	2/21/2018 GK	Call with KAS and staff re extended briefing schedule	0.10	\$475.00	\$47.50				0.1	79.5				
	2/21/2018 GK	Review OC's letter re mediation	0.20	\$475.00	\$95.00									
	2/21/2018 GK	Email KAS and KK re mediation letter	0.10	\$475.00	\$47.50				0.1	47.5				
	2/22/2018 KAS	Calls with CH re schedule	0.30	\$795.00	\$238.50									
	2/22/2018 KAS	Sunrise call with individual co counsel	0.90	\$795.00	\$715.50				0.9	715.5				
	2/22/2018 KAS	Review draft amended complaint and cases	0.50	\$795.00	\$397.50									
	2/22/2018 KK	Drafted memo re call w/ ethics expert	0.30	\$590.00	\$177.00				0.3	177				
	2/22/2018 GK	TC w/ KAS and KK re amended complaint	0.30	\$475.00	\$142.50									
	2/22/2018 KK	TC w/ SC re amended complaint	0.20	\$590.00	\$118.00									
	2/22/2018 KK	TC w/ KAS, GK, and CH re amended complaint	0.30	\$590.00	\$177.00									
	2/23/2018 KK	draft amended complaint	0.70	\$590.00	\$413.00									
	2/23/2018 KK	TC w/ named plaintiff re arbitration	0.30	\$590.00	\$177.00									
	2/23/2018 KK	TC w/ witness re evacuations	0.70	\$590.00	\$413.00									
	2/23/2018 KAS	Sunrise calls with K. Valentine, CH, W. York re research, investigation, strategy	0.50	\$795.00	\$397.50									
	2/23/2018 KAS	Work on draft amended complaint	0.50	\$795.00	\$397.50									
	2/23/2018 KAS	Read Valentine depositions and other testimony	1.90	\$795.00	\$1,510.50									
	2/26/2018 KAS	Sunrise calls with witnesses and emails re motions and complaint deadlines	1.20	\$795.00	\$954.00									
	2/27/2018 KK	Email to CH re investigation	0.30	\$590.00	\$177.00									
	2/27/2018 KAS	Text w/C. Lee	0.10	\$795.00	\$79.50									
	2/27/2018 KAS	Sunrise review stipulation on schedule	0.30	\$795.00	\$238.50				0.3	238.5				
	2/27/2018 KAS	Emails w Chris re stipulation on schedule	0.30	\$795.00	\$238.50									
	2/27/2018 KAS	Call to CH and C. Lee re stipulation	0.30	\$795.00	\$238.50									
	2/28/2018 KAS	Text w/C. Lee	0.10	\$795.00	\$79.50									
	2/28/2018 KAS	Sunrise conference call with C. Lee, CH, W. York, K. Valentine - Discussions re settlement and discovery	2.20	\$795.00	\$1,749.00									
	2/28/2018 KAS	Prep meetings with KK, GK, and team re settlement/discovery meeting	1.00	\$795.00	\$795.00				1	795				
	2/28/2018 KAS	Review emails and plans for moving forward	0.60	\$795.00	\$477.00									
	2/28/2018 GK	Sunrise conference call with C. Lee, CH, W. York, K. Valentine - Discussions re settlement and discovery	2.20	\$475.00	\$1,045.00				2.2	1045				
	2/28/2018 GK	Meetings w KAS, KK, and team re settlement/discovery meeting	1.00	\$475.00	\$475.00				1	475				
	2/28/2018 GK	Review emails and plans for moving forward	0.60	\$475.00	\$285.00				0.6	285				
	2/28/2018 KR	Meetings w KAS, GK, KK re projectes	0.80	\$375.00	\$300.00				0.8	300				
	3/1/2018 KAS	TC w/ KK re litigation strategy	0.20	\$795.00	\$159.00									
	3/1/2018 KK	TC w/ KAS re litigation strategy	0.20	\$590.00	\$118.00									
	3/1/2018 KK	Drafted email to MT re CCL records	0.10	\$590.00	\$59.00									
	3/2/2018 KK	Drafted Notice of Change of Counsel	0.20	\$590.00	\$118.00				0.2	118				
	3/2/2018 KAS	Review KK memo re case overall and emails re Vivian Heredia	0.10	\$795.00	\$79.50									
	3/7/2018 KAS	Text w/C. Lee	0.10	\$795.00	\$79.50									
	3/9/2018 KR	Call with expert, MT, and KAS	0.50	\$375.00	\$187.50				0.5	187.5				
	3/9/2018 KAS	Call with expert, MT, and KG	0.50	\$795.00	\$397.50									
	3/12/2018 KAS	Text w/C. Lee	0.10	\$795.00	\$79.50									
	3/13/2018 KAS	Text w/C. Lee	0.10	\$795.00	\$79.50									
	3/19/2018 KAS	Text w/C. Lee	0.10	\$795.00	\$79.50									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs	Falkenberg	Travel				
				Worked			General	Fees				Hrs	Fees	Hrs	Fees
							Hrs					Hrs		Hrs	
Fees															
3/20/2018	KAS	Texts and call w/C. Lee	0.60		\$795.00	\$477.00									
3/22/2018	KAS	Emails re Vivian Heredia	0.10		\$795.00	\$79.50									
3/23/2018	KAS	Texts w/C. Lee	0.10		\$795.00	\$79.50									
3/24/2018	KAS	Texts w/C. Lee	0.20		\$795.00	\$159.00									
3/25/2018	KAS	Texts w/C. Lee	0.20		\$795.00	\$159.00									
3/28/2018	KAS	Texts w/C. Lee	0.20		\$795.00	\$159.00									
3/30/2018	KAS	Review Defendants' MTC Arbitration and MTD	1.00		\$795.00	\$795.00									
4/1/2018	KAS	Calls and Texts w/C. Lee re Meetings	0.30		\$795.00	\$238.50									
4/2/2018	KAS	Calls and Texts w/C. Lee re Meetings	0.20		\$795.00	\$159.00									
4/5/2018	KAS	Letter to C. Lee re meeting and documents	0.30		\$795.00	\$238.50									
4/24/2018	KAS	Calls and Texts w/C. Lee re Meetings	0.50		\$795.00	\$397.50									
4/29/2018	KAS	Texts and calls w/C. Lee	0.30		\$795.00	\$238.50									
5/4/2018	KAS	Discovery: discussion with BU re Rule 26(f) disclosures.	0.70		\$795.00	\$556.50									
5/4/2018	Brian Umpierre (BU)	Discovery: discussion with KAS re Rule 26(f) disclosures.	0.70		\$600.00	\$420.00									
5/4/2018	BU	Discovery: review file re Rule 26(f) disclosures for responsive information	4.30		\$600.00	\$2,580.00									
5/4/2018	BU	Edits to operative draft of Rule 26(f) disclosures based on file review	2.50		\$600.00	\$1,500.00									
5/7/2018	KAS	Calls and texts w/Ganz	0.20		\$795.00	\$159.00									
5/7/2018	BU	Discovery: edits to Rule 26(f) disclosures.	1.00		\$600.00	\$600.00									
5/8/2018	KAS	Calls and texts w/Ganz	0.40		\$795.00	\$318.00									
5/9/2018	KAS	Calls and texts w/Ganz	0.50		\$795.00	\$397.50									
5/14/2018	BU	Discovery: telephone call with KK re 26(f) disclosures	0.20		\$600.00	\$120.00		0.2	120						
5/14/2018	BU	Finalize draft of Rule 26(f) disclosures and forward to KAS, GK	0.70		\$600.00	\$420.00									
5/17/2018	BU	Discovery: retrieve from doc production the job description for 'Executive Director' and forward to CH, R. Brass.	0.50		\$600.00	\$300.00									
5/29/2018	GK	Review and edit 26(f) initial disclosures and CMC statement for filing	1.50		\$475.00	\$712.50									
5/29/2018	GK	Call with BU re Rule 26(f) initial disclosures and CMC statement	0.20		\$475.00	\$95.00		0.2	95						
5/29/2018	BU	Discovery: discussion with KAS re production of medical records and use of medical release form	0.20		\$600.00	\$120.00									
5/29/2018	KAS	Disc: discussion w/GK re production of medical records and use of medical release form	0.20		\$795.00	\$159.00		0.2	159						
5/29/2018	BU	Review 26(f) initial disclosures and CMC statement for filing	0.60		\$600.00	\$360.00									
5/29/2018	BU	Phone call with R. Evans re 26(f) initial disclosures and CMC statement for filing	0.20		\$600.00	\$120.00		0.2	120						
6/1/2018	KAS	Meetings-communications: Weekly conference call re status (KAS, CH, GW, SC, et al).	0.10		\$795.00	\$79.50									
6/1/2018	BU	Meetings-communications: Weekly conference call re status (KAS, CH, GW, SC, et al).	0.10		\$600.00	\$60.00				0.1	60				
6/1/2018	GK	Meetings-communications: Weekly conference call re status (KAS, CH, GW, SC, et al).	0.10		\$475.00	\$47.50				0.1	47.5				
7/25/2018	BU	Discovery: CCL record summaries (Westlake Village, Claremont).	4.30		\$600.00	\$2,580.00									
8/1/2018	KAS	Phone call with client Elise Ganz	0.60		\$795.00	\$477.00									
8/20/2018	GK	Call with CH, MT, KAS re class representatives	0.40		\$475.00	\$190.00									
8/20/2018	KAS	Sunrise emails re current class representatives and potential additional class representatives	0.20		\$795.00	\$159.00									
8/20/2018	KAS	Call with CH, MT, KAS re class representatives	0.40		\$795.00	\$318.00									
8/31/2018	BU	Meetings-communications: telephone conversation with putative class member	0.50		\$600.00	\$300.00									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
8/31/2018	BU	Email summary re telephone conversation with putative class member re Sunrise Yorba Linda	0.30		\$600.00	\$180.00			0.3	180				
9/5/2018	BU	Meetings-communications: telephone call with putative class member re background/facts	0.10		\$600.00	\$60.00								
9/5/2018	KAS	Review emails to putative class member	0.30		\$795.00	\$238.50								
9/5/2018	BU	Meetings-communications: telephone call and follow up email to putative class member	0.60		\$600.00	\$360.00								
9/5/2018	BU	Email to KAS re same telephone call and follow up email to putative class member	0.10		\$600.00	\$60.00			0.1	60				
9/6/2018	BU	Meetings-communications: email follow up with putative class member	0.20		\$600.00	\$120.00								
9/7/2018	BU	Meetings-communications: telephone call with putative class member re background/facts	1.10		\$600.00	\$660.00								
9/7/2018	BU	Email summary of telephone call with putative class member	0.40		\$600.00	\$240.00			0.4	240				
9/11/2018	BU	Discuss class representatives with GK, KAS	0.40		\$600.00	\$240.00								
9/11/2018	GK	Sunrise discuss class reps and mt w KAS and BU	0.50		\$475.00	\$237.50								
9/11/2018	KAS	Sunrise discuss class reps and mt w GK and BU	0.50		\$795.00	\$397.50								
10/3/2018	KAS	Discovery: discussion with BU, GK re status, plaintiffs	0.30		\$795.00	\$238.50								
10/3/2018	GK	Discovery: discussion with KAS, BU re status, plaintiffs	0.30		\$475.00	\$142.50								
10/3/2018	BU	Discovery: discussion with KAS, GK re status, plaintiffs.	0.30		\$600.00	\$180.00								
10/4/2018	KAS	Sunrise calls to CH re discovery issues	0.50		\$795.00	\$397.50								
10/4/2018	GK	Sunrise calls and emails to CH re discovery issues	0.50		\$475.00	\$237.50			0.5	237.5				
10/4/2018	BU	Sunrise calls to CH re discovery issues	0.50		\$600.00	\$300.00			0.5	300				
10/31/2018	KAS	Sunrise read court opinion on MTC arbitration and transfer venue	0.90		\$795.00	\$715.50								
10/31/2018	KAS	Emails and calls with individual co counsel re MTC arbitration and transfer venue	0.50		\$795.00	\$397.50								
10/31/2018	GK	Sunrise read court opinion on MTC arbitration and transfer venue	0.90		\$475.00	\$427.50			0.4	190				
10/31/2018	GK	Emails and calls with individual co counsel re MTC arbitration and transfer venue	0.50		\$475.00	\$237.50			0.5	237.5				
10/31/2018	BU	Sunrise read court opinion on MTC arbitration and transfer venue	1.40		\$600.00	\$840.00			0.9	540				
11/1/2018	KAS	Sunrise call with CH re strategy after MTC and venue transfer	0.50		\$795.00	\$397.50								
11/1/2018	KAS	Emails re transfer and calls re judges	0.60		\$795.00	\$477.00			0.6	477				
11/1/2018	BU	Call with KAS re complaint and new facts	0.30		\$600.00	\$180.00								
11/1/2018	KAS	Review letter to court and emails	0.50		\$795.00	\$397.50			0.5	397.5				
11/1/2018	KAS	Call to Bob Arns re status/transfer	0.40		\$795.00	\$318.00								
11/1/2018	KAS	Meet with BU re complant and new facts	0.40		\$795.00	\$318.00								
11/2/2018	BU	Meetings-communications: telephone call with putative class member re class rep status and email to KAS, CH re same	0.40		\$600.00	\$240.00								
11/2/2018	KAS	Call w CH re strategy	0.40		\$795.00	\$318.00								
11/2/2018	KAS	Emails with BU and potential new class representative and set meeting	0.30		\$795.00	\$238.50			0.3	238.5				
11/2/2018	KAS	Emails with individual co-counsel re judges	0.60		\$795.00	\$477.00			0.6	477				
11/5/2018	KAS	Call with C. Lee and follow on calls with CH and MT	1.60		\$795.00	\$1,272.00								
11/5/2018	KAS	Calls and texts w/C. Lee	0.70		\$795.00	\$556.50								
11/8/2018	BU	Meetings-communications: email to KAS re background for this morning's call with putative class member	0.30		\$600.00	\$180.00			0.3	180				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
		Meetings-communications: telephone call with KAS and putative class member re class rep status'	1.00	\$600.00		\$600.00			0.2	120				
11/8/2018	BU													
11/8/2018	KAS	Sunrise call with BU and potential class representative	0.80	\$795.00		\$636.00								
11/8/2018	KAS	Preparatoty call with BU for call with potential class representative	0.20	\$795.00		\$159.00			0.2	159				
11/8/2018	KAS	Review background memo on potential class representative	0.50	\$795.00		\$397.50								
11/8/2018	KAS	Call with C. Lee	0.30	\$795.00		\$238.50								
11/8/2018	KAS	Call with CH re call with C. Lee	0.30	\$795.00		\$238.50								
11/14/2018	BU	Review notice to court and call with KAS re same	0.40	\$600.00		\$240.00			0.4	240				
11/14/2018	KAS	Review notice to court and call with BU re same	0.40	\$795.00		\$318.00			0.1	79.5				
11/26/2018	KAS	Emails to co counsel re Lee meeting	0.30	\$795.00		\$238.50								
11/26/2018	KAS	Call with CH re Lee meeting	0.20	\$795.00		\$159.00								
11/26/2018	KAS	Texts and calls w/C. Lee	0.20	\$795.00		\$159.00								
11/27/2018	KAS	Texts and calls w/C. Lee	0.20	\$795.00		\$159.00								
12/4/2018	KAS	Review Defs' MTD	2.00	\$795.00		\$1,590.00								
12/5/2018	GK	Sunrise / meetings-communications: conference call with KAS, CH, MT, BU re status, strategy for tomorrow's meeting with C. Lee	1.00	\$475.00		\$475.00					1	475		
12/5/2018	KAS	Sunrise / meetings-communications: conference call with KAS, CH, MT, BU re status, strategy for tomorrow's meeting with C. Lee	1.00	\$795.00		\$795.00								
12/5/2018	BU	Sunrise / Discovery: review file for CCL records obtained by records request and summaries of same and forward summaries to CH, along with background summary re putative class member inquiry	0.60	\$600.00		\$360.00								
12/5/2018	BU	Sunrise / meetings-communications: conference call with KAS, CH, MT, GK re status, strategy for tomorrow's meeting with C. Lee. Review Judge Staton's Initial Standing Order and Conference Scheduling	1.00	\$600.00		\$600.00					1	600		
12/5/2018	KAS	Meeting with C. Lee	3.00	\$795.00		\$2,385.00								
12/6/2018	KAS	Prepare for meeting w/C. Lee	2.00	\$795.00		\$1,590.00								
12/14/2018	BU	Call with KAS re strategy	0.30	\$600.00		\$180.00								
12/14/2018	KAS	Cals with CH, MT, and BU re next steps and to do list , emails re same	0.80	\$795.00		\$636.00								
12/17/2018	KAS	Calls to class reps - status / update	0.50	\$795.00		\$397.50								
12/18/2018	GK	Call to witness w/ KAS	0.40	\$475.00		\$190.00			0.4	190				
12/18/2018	GK	Memo to co-counsel re call to witness with KAS	0.20	\$475.00		\$95.00								
12/18/2018	KAS	Call to witness w/ GK	0.60	\$795.00		\$477.00			0.2	159				
12/19/2018	BU	Retrieve exemplar assessments for KAS and forward same	0.30	\$600.00		\$180.00			0.3	180				
12/19/2018	BU	Call with KAS re exemplar assessments	0.20	\$600.00		\$120.00								
12/19/2018	KAS	Review exemplar assessments	0.80	\$795.00		\$636.00								
12/19/2018	KAS	Call with BU re exemplar assessments	0.20	\$795.00		\$159.00								
12/27/2018	KAS	Texts and call w/C. Lee	0.20	\$795.00		\$159.00								
12/27/2018	GK	Call Class Rep with KAS and draft letter re same	0.20	\$475.00		\$95.00								
12/27/2018	GK	Prepare KAS letter to OC (settlement negotiations)	0.10	\$475.00		\$47.50								
1/9/2019	KAS	Reviwe MTS	2.00	\$795.00		\$1,590.00								
1/10/2019	GK	Review MTS, calendar, emails with co-counsel and update task list	0.30	\$475.00		\$142.50			0.3	142.5				
1/10/2019	BU	Pleadings: download def's MTS and supporting docs to server	0.20	\$600.00		\$120.00			0.2	120				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked		General Hrs									
		Review Sunrise MTS/MTD; review emails from CH re analysis on opp to MTS	0.70	\$575.00	\$402.50										
1/10/2019	Sarah Colby (SC)														
1/14/2019	KAS	Review stip to continue hearing on MTD	0.20	\$795.00	\$159.00										
1/15/2019	BU	Pleadings: review CCL records for indicia of understaffing for MTD and inclusion in amended complaint	3.70	\$600.00	\$2,220.00										
1/17/2019	SC	Draft outline of issues memo for opp to MTS class allegations	0.30	\$575.00	\$172.50										
		Conf call with co-counsel re oppositions to MTS/MTD/discovery/class cert	0.30	\$575.00	\$172.50										
1/17/2019	SC	Meetings/communications - email to putative class member re case update.	0.20	\$600.00	\$120.00										
1/17/2019	BU	Pleadings - compile facts from available sources (CCL records, interview notes) than can be included in amended compaint.	1.50	\$600.00	\$900.00										
1/17/2019	SC	Legal research re MTS/Ju dge Staton	0.80	\$575.00	\$460.00										
		Meetings/communications - further email correspondence with putative class member re case update	0.20	\$600.00	\$120.00										
1/18/2019	BU	Review MTD/MTS	0.70	\$575.00	\$402.50										
1/18/2019	SC	Legal research on opp to MTD/MTS	2.00	\$575.00	\$1,150.00										
1/20/2019	SC	Legal research on opp to MTD/MTS	0.70	\$575.00	\$402.50										
1/20/2019	SC	Drafting memo for opp to MTS class allegations	1.10	\$575.00	\$632.50										
		Drafting memo on opp to MTS class allegations (includes legal research and review of docs)	2.90	\$575.00	\$1,667.50										
1/21/2019	SC	Calls and texts w/Ganz	0.10	\$795.00	\$79.50										
1/21/2019	KAS	Drafting/editing memo on opp to MTS class allegations	4.20	\$575.00	\$2,415.00										
1/22/2019	SC	Emails with co-counsel re opposition to MTS class allegations/arbitration issues	0.20	\$575.00	\$115.00										
1/22/2019	KAS	Call with class rep Elise Ganz	0.70	\$795.00	\$556.50										
1/22/2019	KAS	Calls and texts w/Ganz	0.50	\$795.00	\$397.50										
1/23/2019	SC	Emails w/ co-counsel re arb/MTS/MTD issues	0.20	\$575.00	\$115.00										
1/24/2019	SC	Emails from and to CH re Ganz/opp to MTS	0.10	\$575.00	\$57.50										
1/24/2019	SC	TC CH re opp to MTS	0.20	\$575.00	\$115.00										
		Pleadings - phone call with CH re opp to MTD and allegations for amended complaint	0.40	\$600.00	\$240.00										
1/25/2019	BU	Send JLS rulings on class cert to CH	0.10	\$575.00	\$57.50					0.1	57.5				
1/25/2019	SC	Send letter to class rep Heredia and email to co-counsel confirming same	0.10	\$475.00	\$47.50										
1/30/2019	GK	TC GW re MTD/MTS/class cert	0.20	\$575.00	\$115.00										
1/30/2019	SC	Pleadings - review CH spreadsheet re internet sources re allegations for 2AC	0.70	\$600.00	\$420.00										
2/1/2019	BU	Compile draft allegations for 2AC from various soruces including from updated CCL records	4.80	\$600.00	\$2,880.00										
2/1/2019	BU	TC GW re opp to MTD/MTS	0.20	\$575.00	\$115.00										
2/2/2019	SC	Pleadings - compile/draft new allegations based on CCL records, witness interviews, internet sources for possible inclusion in amended complaint and forward same to CH	4.50	\$600.00	\$2,700.00										
2/4/2019	BU	Emails with co-counsel re Rule 11 issue	0.10	\$575.00	\$57.50										
2/5/2019	SC	Review CO from OC re same	0.10	\$575.00	\$57.50										
2/5/2019	SC	Discovery - Rule 26(f) conference among BU, CH, BU, and R. Brass.	0.70	\$795.00	\$556.50										
2/5/2019	KAS	Meetings/communications - telephone call with putative class member - background intake	0.10	\$600.00	\$60.00					0.1	60				
2/5/2019	BU														

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
						General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
2/5/2019	BU	Discovery - Rule 26(f) conference among KAS, CH, BU, and R. Brass	0.70	\$600.00	\$420.00								
2/5/2019	BU	Pleadings - search CCL indices for Management Agreement	0.30	\$600.00	\$180.00								
2/5/2019	BU	Email to CH re management agreement citation for Opp to MTD	0.10	\$600.00	\$60.00								
2/6/2019	SC	Emails from and to CH et al re opp to Sunrise MTS	0.10	\$575.00	\$57.50								
2/6/2019	BU	Pleadings - review draft MTD, MTS and edits re same	0.60	\$600.00	\$360.00								
2/7/2019	SC	TC KAS re oppositions to MTS/MTD	0.40	\$575.00	\$230.00								
2/7/2019	SC	Review/edit opp to MTS; emails with co-counsel re same	0.80	\$575.00	\$460.00								
2/7/2019	SC	Review/edit opp to MTD and emails/calls with co-counsel re same	0.80	\$575.00	\$460.00								
2/7/2019	BU	Discovery - draft 26(f) report and circulate to team	2.20	\$600.00	\$1,320.00								
2/7/2019	KAS	Call with SC re MTD	0.50	\$795.00	\$397.50					0.1	79.5		
2/8/2019	SC	Email with co-counsel re MTS/arb issue	0.10	\$575.00	\$57.50								
2/8/2019	BU	Meetings-Communications: edits to responsive Rule 11 letter and email to J. Schwartz	0.50	\$600.00	\$300.00								
2/8/2019	KAS	Review opposition to MTD and MTS	2.00	\$795.00	\$1,590.00								
2/8/2019	SC	Legal research re REITs/class issues and email co-co re same	0.10	\$575.00	\$57.50								
2/11/2019	BU	Discovery: finalize 26(f) report and Ex. A and forward same to defense counsel	0.50	\$600.00	\$300.00								
2/15/2019	KAS	Review Reply ISO MTS	0.50	\$795.00	\$397.50								
2/15/2019	KAS	Review Rule 26(f) report	0.50	\$795.00	\$397.50								
2/15/2019	KAS	Review Reply ISO MTD	0.50	\$795.00	\$397.50								
2/15/2019	BU	Discovery: finalize 26(f) Report and Exhibit A	0.70	\$600.00	\$420.00								
2/15/2019	BU	Email / telephone correspondence with defense counsel re filing of 26(f) Report and Exhibit A	0.20	\$600.00	\$120.00			0.2	120				
2/15/2019	BU	File 26(f) Report and Exhibit A	0.10	\$600.00	\$60.00			0.1	60				
2/17/2019	SC	Call GW re MTD/MTS/complaint amendment	0.20	\$575.00	\$115.00								
2/20/2019	BU	Discovery: telephone call with CH re CCL records/leave to amend.	0.30	\$600.00	\$180.00								
2/20/2019	BU	Discovery: email correspondence with CH re access to facility-specific CCL records/reports and instructions for same.	0.40	\$600.00	\$240.00			0.3	180				
2/27/2019	SC	Review replies on MTS/MTD	0.30	\$575.00	\$172.50								
2/27/2019	SC	Call with CH re same replies on MTS/MTD	0.20	\$575.00	\$115.00								
2/28/2019	KAS	Review Minute Order taking MTD and MTS under submission	0.20	\$795.00	\$159.00								
3/4/2019	KAS	Review Minute Order denying MTD and MTS	0.40	\$795.00	\$318.00								
3/4/2019	BU	Review order on MTD / MTS	0.40	\$600.00	\$240.00			0.2	120				
3/4/2019	SC	Review Order Denying MTS/MTD and emails with co-counsel re same	0.20	\$575.00	\$115.00								
3/5/2019	BU	Discovery: draft RPDs / ROGS	6.30	\$600.00	\$3,780.00								
3/5/2019	BU	Discovery: phone call with CH re draft discovery	0.20	\$600.00	\$120.00								
3/6/2019	BU	Discovery: finalize draft written discovery (RPD/ROG) and forward same to CH	4.10	\$600.00	\$2,460.00								
3/7/2019	SC	Conf call with co-counsel re discovery/class cert	0.20	\$575.00	\$115.00					0.1	57.5		
3/7/2019	GK	Conference call with KAS and co-counsel on tasks, status	0.20	\$475.00	\$95.00					0.1	47.5		
3/7/2019	KAS	Calls with witness	1.90	\$795.00	\$1,510.50								
3/7/2019	KAS	Call with co counsel re tasks, status	0.10	\$795.00	\$79.50								
3/12/2019	BU	Discovery: review/edit DMs' draft RFPs for use in Sunrise case	2.00	\$600.00	\$1,200.00								
3/13/2019	BU	Discovery: call with CH, DM re document requests	0.50	\$600.00	\$300.00								
3/14/2019	BU	Discovery: review / comment on draft RFPs	3.50	\$600.00	\$2,100.00			1	600				
3/18/2019	KAS	Review Answer to Amended Complaint	0.50	\$795.00	\$397.50								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked	Fees	General Hrs	Fees						
		Discovery: review letter from counsel re 26(f) discovery conference, outstanding discovery and email to CH re scheduling same	0.30	\$600.00	\$180.00								
3/22/2019	BU												
3/22/2019	KAS	Call and email with witness/representative Ganz	0.80	\$795.00	\$636.00								
3/25/2019	KAS	Emails re parties	0.30	\$795.00	\$238.50			0.3	238.5				
3/26/2019	KAS	Call with CH - discovery and client status	0.40	\$795.00	\$318.00								
3/26/2019	BU	Discovery: review form of protective order and edit acknowledgement form and email to CH re same	0.50	\$600.00	\$300.00								
3/27/2019	BU	Discovery: further 26(f) conference with Melissa Maryott, Katherine Warren, CH	0.20	\$600.00	\$120.00								
3/27/2019	BU	Discovery: draft revised 26(f) report	2.00	\$600.00	\$1,200.00								
3/27/2019	BU	Discovery: telephone call with CH re 26(f) conference - strategy	0.20	\$600.00	\$120.00								
3/29/2019	BU	Discovery: circulate draft amended 26(f) report to counsel	0.20	\$600.00	\$120.00								
4/4/2019	GK	Call with co-counsel re case update and tasks	0.10	\$475.00	\$47.50								
4/4/2019	SC	Conf call with co-counsel re case update and tasks	0.30	\$575.00	\$172.50					0.2	115		
4/4/2019	SC	Research on Sunrise LLC and Sunrise Management for TAC	1.80	\$575.00	\$1,035.00								
4/5/2019	KAS	Review amended Rule 26(f) report	0.50	\$795.00	\$397.50								
4/8/2019	SC	Emails with CH/L. Valdez re amending complaint	0.10	\$575.00	\$57.50								
4/8/2019	SC	Legal Research for TAC and factual research on Sunrise entities	2.20	\$575.00	\$1,265.00								
4/9/2019	SC	Review former client docs for depo prep	0.80	\$575.00	\$460.00								
4/9/2019	SC	Drafting/editing SAC and emails with CH re same	1.90	\$575.00	\$1,092.50								
4/9/2019	BU	Discovery: draft Ps' initial disclosures and email to CH, KAS re same	1.30	\$600.00	\$780.00								
4/10/2019	BU	Discovery: finalize initial disclosures and work with AW for service	0.30	\$600.00	\$180.00								
4/11/2019	BU	Discovery: review D's initial disclosures and email to CH, KAS re options for getting production of docs identified therein	0.20	\$600.00	\$120.00								
4/11/2019	BU	Legal research re production of docs identified in initial disclosures	0.80	\$600.00	\$480.00								
4/15/2019	SC	Drafting/editing SAC	1.00	\$575.00	\$575.00								
4/15/2019	SC	Research re Sunrise entities and doc review for SAC	1.00	\$575.00	\$575.00								
4/16/2019	SC	Call with T. Needham re Sunrise TAC	0.30	\$575.00	\$172.50								
4/16/2019	SC	Call with CH re Sunrise TAC	0.80	\$575.00	\$460.00								
4/16/2019	KAS	Call with rep and review emails and court opinion prior	0.90	\$795.00	\$715.50								
4/16/2019	SC	Drafting/editing SAC	0.90	\$575.00	\$517.50								
4/16/2019	SC	Research re Sunrise entities and doc review for SAC	0.40	\$575.00	\$230.00								
4/17/2019	KAS	Review civil trial order	0.20	\$795.00	\$159.00								
4/29/2019	BU	Discovery: email correspondence with L. Valdez re CCL subpoena for records	0.50	\$600.00	\$300.00								
5/13/2019	BU	Discovery: review Sunrise's responses and objections to Set 1 requests	2.00	\$600.00	\$1,200.00								
5/13/2019	BU	Draft M&C letter and written discovery chart of objections	5.70	\$600.00	\$3,420.00			0.7	420				
5/14/2019	SC	Meeting with CH and other co-counsel re staffing analysis/depos/docs needed/disc. disputes/experts for class cert	0.20	\$575.00	\$115.00					0.2	115		
5/14/2019	SC	Call with GW re discovery for class cert	0.20	\$575.00	\$115.00								
5/14/2019	BU	Discovery: finalize M&C letter re responses to Set 1 requests and circulate same to CH, KAS	0.50	\$600.00	\$300.00								
5/15/2019	BU	Discovery: client correspondence re written discovery requests	0.40	\$600.00	\$240.00								
5/15/2019	BU	Draft verifications for written discovery requests	0.30	\$600.00	\$180.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
	5/16/2019 KAS	Discovery: email communications with BU, DM re 3rd party owner doc requests	0.20		\$795.00	\$159.00								
	5/16/2019 BU	Discovery: email communications with KAS, DM re 3d party owner doc requests	0.20		\$600.00	\$120.00								
	5/17/2019 BU	Discovery: telephonic M&C re Ds' responses to Set 1 requests	1.20		\$600.00	\$720.00								
	5/20/2019 BU	Discovery: email communications with A. Fearn re search for documents / responses to D's requests	0.30		\$600.00	\$180.00								
	5/20/2019 BU	Discovery: telephone call with E. Ganz re search for documents and responses to D's discovery requests	0.60		\$600.00	\$360.00								
	5/20/2019 BU	Discovery: telephone call with A. Fearn re background facts for discovery responses	0.40		\$600.00	\$240.00								
	5/21/2019 BU	Discovery: review edits to draft M&C letter	0.30		\$600.00	\$180.00								
	5/21/2019 BU	Discovery: draft responses to class rep discovery requests	7.80		\$600.00	\$4,680.00								
	5/21/2019 BU	Discovery: email correspondence to A. Fearn attaching draft discovery responses	0.30		\$600.00	\$180.00								
	5/22/2019 BU	Discovery: draft class rep discovery responses including review of client docs	8.40		\$600.00	\$5,040.00								
	5/22/2019 BU	Discovery: telephone call with A. Fearn re discovery responses	0.80		\$600.00	\$480.00								
	5/22/2019 BU	Discovery: draft letter re 5/17 M&C and circulate to CH, R. Cocchia	1.50		\$600.00	\$900.00								
	5/23/2019 BU	Discovery: work with AW to obtain file endorsed copies of Zack settlement papers for production in class case	0.60		\$600.00	\$360.00			0.6	360				
	5/23/2019 BU	Discovery: emails with CH re draft M&C letter re Set 1 requests	0.20		\$600.00	\$120.00								
	5/23/2019 BU	Discovery: review client docs and draft written discovery responses	6.40		\$600.00	\$3,840.00								
	5/23/2019 BU	Email correspondence with A. Fearn re draft written discovery responses	0.30		\$600.00	\$180.00								
	5/23/2019 KAS	Call to class representative/client A. Fearn	0.30		\$795.00	\$238.50								
	5/23/2019 KAS	Emails with BU re discovery	0.20		\$795.00	\$159.00			0.2	159				
	5/24/2019 BU	Discovery: email clients discovery verification forms	0.10		\$600.00	\$60.00								
	5/24/2019 BU	Discovery: email correspondence with KAS re class rep discovery responses	0.20		\$600.00	\$120.00								
	5/24/2019 BU	Discovery: draft class rep discovery responses, including review client docs	5.50		\$600.00	\$3,300.00								
	5/24/2019 BU	Meetings - communications: email to putative class member re status of mother's stay at Sunrise facility and overall update and email with KAS re same.	0.20		\$600.00	\$120.00								
	5/24/2019 BU	Discovery: telephone call with E. Ganz re class rep discovery responses	0.30		\$600.00	\$180.00								
	5/24/2019 KAS	Discovery: email correspondence with BU re class rep disc responses	0.20		\$795.00	\$159.00								
	5/24/2019 KAS	Calls with class representative/client E. Ganz	1.80		\$795.00	\$1,431.00								
	5/24/2019 KAS	Calls with BU re discovery	0.30		\$795.00	\$238.50			0.3	238.5				
	5/24/2019 KAS	Emails with class representative/client E. Ganz	0.60		\$795.00	\$477.00								
	5/24/2019 KAS	Conference call with team	0.40		\$795.00	\$318.00					0.4	318		
	5/24/2019 BU	Discovery: telephone call with E. Ganz re class rep discovery responses	1.50		\$600.00	\$900.00								
	5/27/2019 BU	Discovery: email to A. Fearn scheduling phone call re discovery responses	0.10		\$600.00	\$60.00			0.1	60				
	5/28/2019 SC	emails with BU/KAS re SAC	0.10		\$575.00	\$57.50			0.1	57.5				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked			General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
Fees														
	5/28/2019 KAS	emails with BU/SC re SAC	0.10	\$795.00	\$79.50				0.1	79.5				
	5/28/2019 BU	Discovery: finalize Ps' doc productions for service tomorrow	5.30	\$600.00	\$3,180.00									
	5/28/2019 BU	Finalize written responses	2.50	\$600.00	\$1,500.00									
	5/28/2019 BU	Meetings - communications: telephone call with putative class member re status / update / potential class rep	0.50	\$600.00	\$300.00									
	5/28/2019 BU	Discovery: forward final drafts of written responses to clients for review / comment	0.20	\$600.00	\$120.00									
	5/29/2019 BU	Discovery: email correspondence with clients re final edits to written discovery responses	0.30	\$600.00	\$180.00									
	5/29/2019 BU	Discovery: Finalize and serve Ps' written discovery responses and doc productions	3.50	\$600.00	\$2,100.00									
	6/7/2019 SC	Research on Sunrise Senior Living and Sunrise Senior Living Management for SAC	1.20	\$575.00	\$690.00									
	6/7/2019 SC	Review DSS and other docs on SSL for drafting SAC	2.40	\$575.00	\$1,380.00									
	6/7/2019 SC	Email to BU re management agreement	0.20	\$575.00	\$115.00									
	6/7/2019 SC	Draft/edit SAC and emails with co-co re same	2.00	\$575.00	\$1,150.00									
	6/7/2019 GK	Conference call with team	0.20	\$475.00	\$95.00						0.2	95		
	6/7/2019 KAS	Emails re opinion and read opinion	0.80	\$795.00	\$636.00									
	6/7/2019 BU	Pleadings: email to SC attaching management agreements for draft allegations in amended complaint	0.20	\$600.00	\$120.00									
	6/7/2019 SC	Call with GW re class cert issues	0.40	\$575.00	\$230.00									
	6/7/2019 SC	Emails with co-co re Shiferaw case and related care staffing issues	0.20	\$575.00	\$115.00									
	6/9/2019 KAS	Draft/edit SAC and emails with CH/SC re same	2.50	\$795.00	\$1,987.50									
	6/9/2019 SC	Draft/edit SAC and emails with CH/KAS re same	2.50	\$575.00	\$1,437.50									
	6/10/2019 SC	Emails to and from GW re class cert issues	0.10	\$575.00	\$57.50									
	6/10/2019 BU	Pleadings: draft CLRA notice to newly named Sunrise entity	0.40	\$600.00	\$240.00									
	6/10/2019 SC	Draft/edit SAC	2.40	\$575.00	\$1,380.00									
	6/10/2019 SC	Review memos from MY re staffing citations/etc and emails with co-co re same	0.60	\$575.00	\$345.00									
	6/10/2019 BU	Pleadings: email summary of putative class member status and class rep availability	0.20	\$600.00	\$120.00									
	6/11/2019 SC	Review and edit SAC and email to co-counsel re same	1.90	\$575.00	\$1,092.50									
	6/11/2019 BU	Discovery: telephone call with Elise Ganz re Helen at San Rafael and schedule to review docs	0.30	\$600.00	\$180.00									
	6/11/2019 SC	Call with CH/BU re SAC	0.40	\$575.00	\$230.00									
	6/11/2019 SC	Review and edit CLRA letter	0.20	\$575.00	\$115.00									
	6/11/2019 BU	Pleadings: telephone call with CH, SC re amended complaint, CLRA letter	0.50	\$600.00	\$300.00									
	6/12/2019 SC	Emails from CH re final drafts of SAC and CLRA	0.10	\$575.00	\$57.50									
	6/13/2019 BU	Discovery: review case file for budget materials re daily budgeted, targeted, actual staffing levels and email correspondence with GK re same.	0.40	\$600.00	\$240.00									
	6/13/2019 BU	Discovery: M&C re RPD Set 1; amended complaint / stipulation re same	1.20	\$600.00	\$720.00									
	6/13/2019 BU	Discovery: prepare for this afternoon's M&C	1.00	\$600.00	\$600.00				0.5	300				
	6/13/2019 BU	Discovery: draft M&C letter re responses and objections to Ps' RPD Sets 2-3	2.50	\$600.00	\$1,500.00									
	6/14/2019 GK	Conference call with team re strategy	0.20	\$475.00	\$95.00						0.2	95		

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	6/14/2019	BU	Discovery: draft insert re assessment/payroll data subset proposal	0.50	\$600.00	\$300.00								
	6/17/2019	BU	Discovery: draft M&C letter re responses and objections to Ps' RPD Sets 2-3	4.90	\$600.00	\$2,940.00								
	6/18/2019	BU	Discovery: email correspondence with CH re requests for medical info releases	0.20	\$600.00	\$120.00								
	6/18/2019	BU	Discovery: download / first pass review of Sunrise's initial doc production	1.70	\$600.00	\$1,020.00			0.2	120				
	6/20/2019	KAS	Review stipulated order re filing SAC	0.20	\$795.00	\$159.00								
	6/20/2019	BU	Discovery: draft M&C email re authorization for release of medical records issue	1.50	\$600.00	\$900.00								
	6/21/2019	KAS	Review SAC for filing	0.50	\$795.00	\$397.50								
	6/21/2019	BU	Discovery: discussion with KAS re medical records authorizations and Heredia dismissal	0.40	\$600.00	\$240.00								
	6/24/2019	BU	Review client rep agreements re fees and costs	0.30	\$600.00	\$180.00			0.3	180				
	6/24/2019	BU	Discussion with KAS re fees/costs analysis of rep agreement language; email to CH re same.	0.10	\$600.00	\$60.00								
	6/25/2019	KAS	Talk with A. Fearn and E. Ganz re settlement offers	0.80	\$795.00	\$636.00								
	6/25/2019	KAS	Call w CH re settlement offers and client communications re same	0.30	\$795.00	\$238.50								
	6/25/2019	KAS	Meeting with BU re settlement offers and client communications re same, and letters to defendants in response	0.40	\$795.00	\$318.00								
	6/25/2019	BU	Settlement: draft letters to clients and defense counsel re settlement offer rejection	1.40	\$600.00	\$840.00								
	6/26/2019	BU	Settlement: forward KAS letters to clients informing of settlement offer	0.10	\$600.00	\$60.00			0.1	60				
	6/27/2019	BU	Settlement: forward KAS letters to defense counsel rejecting settlement offers	0.10	\$600.00	\$60.00			0.1	60				
	6/27/2019	BU	Discovery: email to defense counsel re Ps' position on medical information release forms	0.30	\$600.00	\$180.00								
	7/2/2019	KAS	Meet with team on task list	0.40	\$795.00	\$318.00			0.4	318				
	7/15/2019	BU	Discovery: review and prepare index of Ds' three document productions and circulate same to CH, MY, MT, R. Cochia, KAS	5.70	\$600.00	\$3,420.00								
	7/15/2019	KAS	Review Answer to SAC	0.50	\$795.00	\$397.50								
	7/22/2019	BU	Discovery: email correspondence with CH re temporal scope of CCL record requests in Oakmont, Aegis for comparison in Sunrise	0.40	\$600.00	\$240.00								
	7/26/2019	BU	Discovery: review/comments on draft MTC	0.40	\$600.00	\$240.00								
	7/31/2019	BU	Discovery: email communications with R. Cocchia re M&C letter on Ps' RFP Set 1 and docs produced by Ds' to date	1.00	\$600.00	\$600.00								
	8/9/2019	KAS	Meet w/ BU and GK re emails re CCL and records	1.10	\$795.00	\$874.50								
	8/12/2019	BU	Discovery: email correspondence with defense counsel re Ps' position on medical release / authorization forms	0.20	\$600.00	\$120.00								
	8/12/2019	BU	Discovery: email correspondence with KAS re medical release/authorization issue, including history and proposed response to defense	0.80	\$600.00	\$480.00								
	8/12/2019	KAS	Discovery: Email correspondence and discussion w/BU re medical release/authorization issue, including history and proposed response to defense	0.80	\$795.00	\$636.00			0.3	238.5				
	8/16/2019	GK	M&C call with Deputy AG and defense re DSS Subpoenas	0.80	\$475.00	\$380.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	8/20/2019	BU	Discovery: email to defense counsel requesting M&C on medical release authorization issue	0.10	\$600.00	\$60.00								
	8/20/2019	BU	Discovery: compile materials for tomorrow's M&C re medical release authorization and forward same to KAS - applicable subpoenas, release forms, bullet points for conversation	1.00	\$600.00	\$600.00			0.5	300				
	8/21/2019	BU	Discovery: email and phone call with A. Fearn re availability for signature	0.10	\$600.00	\$60.00								
	8/23/2019	BU	Discovery: M&C call with KAS, A. Allen re Ds request for medical release authorizations; discussion with SP re same	0.50	\$600.00	\$300.00								
	8/23/2019	KAS	Discovery: M&C call w/BU, A. Allen re Ds request for medical release authorizations	0.50	\$795.00	\$397.50								
	8/26/2019	BU	Discovery: conversation with SP re communications with subpoenaed doctors/entities and authorizing release of information	0.20	\$600.00	\$120.00			0.2	120				
	8/29/2019	BU	Discovery: forward to R. Cocchia and CH forms of BelAire notice used in Aegis and Oakmont	0.20	\$600.00	\$120.00			0.2	120				
	9/3/2019	BU	Meetings-communications: discussion with DZ re PNC and potential as class rep in class case	0.20	\$600.00	\$120.00			0.2	120				
	9/5/2019	GK	M&C call with Deputy AG and defense re DSS Subpoenas	0.50	\$475.00	\$237.50								
	9/18/2019	BU	Meetings-communications: draft language re class case for individual case / PNC reject letter and forward same to SP, DZ	0.30	\$600.00	\$180.00			0.3	180				
	9/19/2019	GK	Call with co-counsel R. Cocchia re DSS Subpoenas	0.20	\$475.00	\$95.00								
	9/19/2019	BU	Meetings - communications: emails with CH re putative class member contact	0.10	\$600.00	\$60.00								
	9/19/2019	BU	Email to putative class member re scheduling phone call (potential client / class rep)	0.10	\$600.00	\$60.00			0.1	60				
	9/20/2019	BU	Meetings-communications: email correspondence with putative class member scheduling telephone call and email to CH re same	0.10	\$600.00	\$60.00			0.1	60				
	9/23/2019	BU	Meetings - communications: email to CH with background info on putative class member and her mother	0.20	\$600.00	\$120.00								
	9/23/2019	BU	Meetings-communications: phone call with putative class member re update on situation at Sunrise; agreement to serve as class rep and email to KAS, CH, R. Cocchia re same.	0.60	\$600.00	\$360.00								
	11/20/2019	KAS	Review status report re Belaire-West notice	0.20	\$795.00	\$159.00								
	11/22/2019	KAS	Call with Team re status and tactics	0.40	\$795.00	\$318.00					0.2	159		
	12/3/2019	KAS	Calls and texts with class representative/client E. Ganz	0.30	\$795.00	\$238.50								
	12/4/2019	KAS	Review statement re Protective Order	0.30	\$795.00	\$238.50								
	12/6/2019	KAS	Review ESI Stipulation	0.20	\$795.00	\$159.00								
	12/10/2019	BU	Pull daily labor reports and annual turnover docs and forward to CH, MT	0.60	\$600.00	\$360.00								
	12/10/2019	BU	Depo prep conference call with MT, CH, SW, MY	0.80	\$600.00	\$480.00			0.8	480				
	12/10/2019	BU	Review/finalize e-discovery search terms and forward to MJ	0.40	\$600.00	\$240.00								
	12/10/2019	BU	Forward BelAire caller info to MY	0.20	\$600.00	\$120.00			0.2	120				
	12/10/2019	BU	Gather notes/memos on witness communications	0.40	\$600.00	\$240.00			0.4	240				
	12/11/2019	BU	Email correspondence with absent putative class member re experience/documents	0.30	\$600.00	\$180.00			0.3	180				
	12/11/2019	BU	Gather notes/memos on witness communications; circulate to depo team	0.50	\$600.00	\$300.00			0.5	300				
	12/12/2019	BU	Test search strings and edit accordingly and forward to MJ	2.30	\$600.00	\$1,380.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	CC Confs Hrs				
	12/12/2019	BU	Phone call with MJ re search terms/custodians	0.40	\$600.00	\$240.00						
	12/13/2019	BU	Email correspondence with A. Fearn re available depo dates	0.20	\$600.00	\$120.00			0.2	120		
	12/13/2019	BU	Phone call with MJ, R. Cocchia re search terms/custodians	0.80	\$600.00	\$480.00						
	12/17/2019	BU	Email to CH re class rep depo availability	0.20	\$600.00	\$120.00						
	12/28/2019	KAS	Calls and texts w/Ganz	0.20	\$795.00	\$159.00						
	12/30/2019	KAS	Review client (Ganz) docs	1.30	\$795.00	\$1,033.50						
	12/30/2019	KAS	Call with class representative/client E. Ganz	0.70	\$795.00	\$556.50						
	1/7/2020	BU	Download / forward newest doc production for upload to Relativity	0.30	\$600.00	\$180.00			0.3	180		
	1/7/2020	BU	Spot searches and retrieval of documents identified at deposition	1.50	\$600.00	\$900.00						
	1/7/2020	BU	Email correspondence with GW re class rep depo prep and coverage	0.30	\$600.00	\$180.00						
	1/7/2020	KAS	Fwd email to BU Sunrise Depo Prep	0.10	\$795.00	\$79.50			0.1	79.5		
	1/7/2020	KAS	Email to CH re Sunrise - critical witness	0.20	\$795.00	\$159.00						
	1/7/2020	BU	Phone call with CH re strategy for streamlined discovery hearing	0.30	\$600.00	\$180.00						
	1/8/2020	BU	Email update to CH re current status of Helen Ganz	0.50	\$600.00	\$300.00						
	1/8/2020	BU	Email to CH re Ganz and emails to CH/MT re Sunrise VP Vanessa Forsythe	0.60	\$795.00	\$477.00						
	1/8/2020	KAS	Email to Amy Fearn re Sunrise Class Action Case	0.20	\$795.00	\$159.00						
	1/9/2020	BU	Pull docs for depositions per CH request.	1.30	\$600.00	\$780.00			0.5	300		
	1/9/2020	BU	Phone call with E. Ganz re depo prep / depo scheduling	0.40	\$600.00	\$240.00						
	1/9/2020	BU	Email to GW re proposed class rep depo schedule	0.20	\$600.00	\$120.00						
	1/9/2020	BU	Email to CH re updated info on Helen Ganz	0.20	\$600.00	\$120.00						
	1/9/2020	BU	Review / comments on draft MTC and email to CH re same	0.50	\$600.00	\$300.00						
	1/10/2020	BU	Review Ds' opposition to MTC	0.40	\$600.00	\$240.00						
	1/10/2020	BU	Telephone call with BelAire caller/putative class member and email summary to team	1.40	\$600.00	\$840.00			0.4	240		
	1/10/2020	BU	Document review / coding	1.00	\$600.00	\$600.00						
	1/13/2020	KAS	Calls w/ MT and CH re class representative depositions/schedule	0.20	\$795.00	\$159.00						
	1/13/2020	KAS	Meet with BU re class representative deposition schedule	0.30	\$795.00	\$238.50						
	1/13/2020	BU	Email correspondence with CH re class rep depo schedule	0.20	\$600.00	\$120.00						
	1/14/2020	BU	Draft M&C email to A. Allen re ESI search terms and custodians and circulate for review and comment	0.80	\$600.00	\$480.00						
	1/14/2020	BU	Prepare client/witness binders for depo prep (Ganz)	1.50	\$600.00	\$900.00						
	1/15/2020	BU	Team call re discovery / class cert status and strategy	0.50	\$600.00	\$300.00						
	1/15/2020	KAS	Call with Team re discovery / class cert status and strategy	1.10	\$795.00	\$874.50			0.60	\$477.00		
	1/15/2020	KAS	Meet with BU re discovery tasks/depositions	0.60	\$795.00	\$477.00			0.6	477		
	1/15/2020	BU	Review client documents produced in discovery in order to prepare client / witness binders for depo prep (Zack, Fearn)	3.60	\$600.00	\$2,160.00						
	1/15/2020	KAS	Email to CH/MT/BU/DM re Healthpeak REIT and Sunruse	0.40	\$795.00	\$318.00						
	1/15/2020	KAS	Email to MT/DM/CH/BU/SW/GW re witness meeting	0.20	\$795.00	\$159.00						
	1/15/2020	BU	Edits to M&C letter re ESI / search terms / custodians and revised search term list for Defendant	1.30	\$600.00	\$780.00						
	1/16/2020	BU	Revised search term list	1.40	\$600.00	\$840.00						
	1/16/2020	BU	A. Fearn depo prep binder and index	3.20	\$600.00	\$1,920.00			0.2	120		
	1/16/2020	KAS	Emails to GK re Sunrise ED meeting	0.30	\$795.00	\$238.50						
	1/17/2020	BU	Discussion with staff re delivery of depo prep binders	0.20	\$600.00	\$120.00			0.2	120		
	1/17/2020	KAS	Meet with witness	2.00	\$795.00	\$1,590.00						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked	Fees	General Hrs	Fees						
		Review doc productions for custodians list and incorporate SW's additions	2.30	\$600.00	\$1,380.00								
1/17/2020	BU												
1/20/2020	BU	Edit ESI discovery email to A. Allen	0.30	\$600.00	\$180.00								
1/20/2020	KAS	Call CH re witness and review docs	0.90	\$795.00	\$715.50								
1/21/2020	BU	Email correspondence with counsel re class rep depo schedule	0.20	\$600.00	\$120.00								
1/21/2020	BU	Class rep depo prep - review client docs, including Relativity searches for same produced by Defendants	3.50	\$600.00	\$2,100.00			0.5	300				
1/22/2020	KAS	Email to CH re Sunrise - Commissions paid to sales Directors from Move-In Fees	0.20	\$795.00	\$159.00								
1/22/2020	BU	Email correspondence with A. Fearn re depo scheduling and emails with GW re same	0.40	\$600.00	\$240.00								
1/23/2020	BU	Communicate with E. Ganz re depo availability	0.10	\$600.00	\$60.00								
1/23/2020	BU	Email correspondence with defense and Ps' team re class rep depo dates	0.30	\$600.00	\$180.00								
1/24/2020	KAS	Emails and Fwd to CH re result of 1/23/20 Motion to Compel	0.50	\$795.00	\$397.50								
1/25/2020	BU	Emails/texts with E. Ganz, A. Fearn, GW re class rep depo schedule	0.30	\$600.00	\$180.00			0.3	180				
1/25/2020	BU	Draft email to defense re class representative deposition schedule/availability	0.20	\$600.00	\$120.00								
1/25/2020	BU	Review new E. Ganz docs and prepare for production	2.50	\$600.00	\$1,500.00								
1/27/2020	BU	Email correspondence with BelAire contact re status	0.10	\$600.00	\$60.00			0.1	60				
1/27/2020	BU	Review E. Ganz docs - depo prep	3.00	\$600.00	\$1,800.00								
1/27/2020	BU	Email communications with A. Fearn, E. Ganz re depo schedule and other communications	0.50	\$600.00	\$300.00								
1/28/2020	BU	Email correspondence with GW re class rep depo locations and email to defense re same	0.30	\$600.00	\$180.00			0.3	180				
1/28/2020	KAS	Fwd to BU re Sunrise - Named Plaintiffs Depo	0.20	\$795.00	\$159.00			0.2	159				
1/28/2020	BU	Review / bates label most recent Ganz docs and prepare for production	1.50	\$600.00	\$900.00			1	600				
1/29/2020	BU	Relativity doc review	2.00	\$600.00	\$1,200.00								
1/29/2020	BU	Phone call with CH, R. Cocchia re ESI discovery and MTC	0.40	\$600.00	\$240.00								
1/29/2020	BU	Draft MTC re ESI	4.50	\$600.00	\$2,700.00								
1/30/2020	BU	Draft MTC re ESI, BU declaration in support, compile exhibits and forward to CH, R. Cocchia	5.50	\$600.00	\$3,300.00								
1/30/2020	BU	Download new doc production and forward for Relativity upload	0.50	\$600.00	\$300.00			0.5	300				
1/31/2020	KAS	Emails to CH re Call: Expense Reimbursement and NY Times inquiry	0.80	\$795.00	\$636.00								
1/31/2020	KAS	Email to BU/GK/MY re NY Times Inquiry	0.20	\$795.00	\$159.00								
2/1/2020	KAS	Fwd email to CH re NY Times interview request	0.10	\$795.00	\$79.50								
2/1/2020	KAS	Email and Fwd to BU re Sunrise and Order on Motion to Compel	0.30	\$795.00	\$238.50			0.3	238.5				
2/3/2020	BU	E. Ganz depo prep with GW	5.50	\$600.00	\$3,300.00								
2/3/2020	BU	Email communications with BelAire caller scheduling phone call	0.20	\$600.00	\$120.00			0.2	120				
2/3/2020	BU	Review draft M&C letter re search terms and email to CH re same	0.40	\$600.00	\$240.00								
2/3/2020	KAS	Email to CH re Expert costs reimbursement	0.20	\$795.00	\$159.00			0.2	159				
2/4/2020	KAS	Phone call with BelAire contact and GK	0.20	\$795.00	\$159.00								
2/4/2020	BU	Gather/pull materials for NY Times reporter	1.40	\$600.00	\$840.00								
2/4/2020	BU	Phone call with BelAire contact not receiving notice, staffing issues/experiences, potential individual case	0.50	\$600.00	\$300.00			0.5	300				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
	Fees													
2/4/2020	KAS	Review of email Summary of Ganz prep from BU	0.30	\$795.00	\$238.50				0.2	159				
2/4/2020	KAS	Email to BU re Disc Request responses	0.30	\$795.00	\$238.50									
2/4/2020	BU	Email to GW re Fearn depo prep schedule	0.30	\$600.00	\$180.00				0.3	180				
		Email correspondence re M&C letter edits - production of incident reports / background on Sunrise of Santa Monica for facility sample set												
2/4/2020	BU	Summary of BelAire contact phone call to GK, KAS	0.60	\$600.00	\$360.00									
2/4/2020	BU	Email summary of Ganz prep session to KAS	0.20	\$600.00	\$120.00									
2/4/2020	BU	Email summary of Ganz prep session to KAS	0.30	\$600.00	\$180.00									
2/5/2020	BU	Discussion with GW re Ganz depo	0.20	\$600.00	\$120.00									
2/5/2020	BU	Phone call with E. Ganz and GW re depo	0.30	\$600.00	\$180.00									
		Email to KAS re materials for NY Times reports and attach docs re same												
2/5/2020	BU		0.70	\$600.00	\$420.00				0.2	120				
2/6/2020	BU	E. Ganz depo at Schneider Wallace	8.30	\$600.00	\$4,980.00									
2/6/2020	KAS	Call with CH, emails re depo of Ganz w/ GW and BU	0.90	\$795.00	\$715.50									
2/6/2020	KAS	Email to BU re Sunrise docs for NYT reports	0.20	\$795.00	\$159.00									
2/7/2020	BU	Phone call with KAS re depo coverage	0.10	\$600.00	\$60.00				0.1	60				
2/7/2020	BU	Phone call with GW re depo coverage	0.20	\$600.00	\$120.00				0.2	120				
2/7/2020	KAS	Calls and texts w/Ganz	0.70	\$795.00	\$556.50									
2/7/2020	BU	Upload 3d party docs to Dropbox for upload to Relativity	0.50	\$600.00	\$300.00				0.5	300				
2/7/2020	KAS	Call with E. Ganz, BU, and CH re deposition	0.50	\$795.00	\$397.50									
2/7/2020	KAS	Review Ganz documents and emails	1.20	\$795.00	\$954.00									
2/7/2020	BU	Search for Ganz/Stebner correspondence re retention	1.00	\$600.00	\$600.00									
2/7/2020	BU	Discussion with KAS, GW re retention agreement	0.30	\$600.00	\$180.00									
2/7/2020	BU	Class rep depo prep outline (Fearn)	3.00	\$600.00	\$1,800.00									
2/7/2020	BU	Class rep depo prep outline (Fearn)	0.40	\$795.00	\$318.00									
2/8/2020	KAS	Calls and texts w/Ganz												
		Email correspondence w/GK re Discussions w Paul Span, NYT and Fwd email re photo for NYT												
2/9/2020	KAS	Assist KAS with answers to NY Times reporter questions re BelAire mailing / Docketbird	0.50	\$795.00	\$397.50									
2/11/2020	BU	Work w/BU on answers to questions from NY Times reporter re BelAire mailing	0.50	\$600.00	\$300.00									
2/11/2020	KAS	Email correspondence re Dropbox/Relativity document availability and credentials for SW	0.50	\$795.00	\$397.50									
2/11/2020	BU	and credentials for SW	0.30	\$600.00	\$180.00				0.3	180				
2/11/2020	KAS	Emails to BU re named plaintiffs depositions	0.40	\$795.00	\$318.00									
2/11/2020	BU	Phone call with GW re depo coverage	0.10	\$600.00	\$60.00				0.1	60				
2/11/2020	BU	Email to defense re Fearn depo date	0.20	\$600.00	\$120.00									
		Email correspondence with GW, J. Gorman re changing Fearn depo date												
2/12/2020	BU		0.30	\$600.00	\$180.00				0.3	180				
2/12/2020	BU	Emails with A. Fearn re deposition date	0.20	\$600.00	\$120.00									
2/12/2020	KAS	Fwd email to BU/CH re Experts	0.10	\$795.00	\$79.50									
		Gather all residency agreements produced to date and discern significant differences, per CH request												
2/12/2020	BU		2.00	\$600.00	\$1,200.00									
2/12/2020	BU	Emails with staff re cloud location for case file for SW access	0.70	\$600.00	\$420.00				0.7	420				
		Gather info for KAS conversation with NY Times reporter, including BelAire notice and subsequent communications, Docketbird												
2/12/2020	BU		1.00	\$600.00	\$600.00				0.5	300				
2/13/2020	KAS	Calls and texts w/Ganz	0.30	\$795.00	\$238.50									
2/14/2020	KAS	Email to BU re NY Times article	0.20	\$795.00	\$159.00									
2/14/2020	BU	Email to CH, GW re Ganz depo testimony / discovery issues	0.20	\$600.00	\$120.00									

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	2/14/2020	BU	Gather all residency agreements produced to date and discern significant differences, per CH request	4.40	\$600.00	\$2,640.00								
	2/15/2020	KAS	Emails to BU re Amy Fearn	0.40	\$795.00	\$318.00								
	2/18/2020	BU	Email correspondence with A. Fearn re complaint/ROG response review and attaching same	0.20	\$600.00	\$120.00								
	2/18/2020	KAS	Email to BU re Aegis docs	0.20	\$795.00	\$159.00			0.2	159				
	2/19/2020	BU	Detailed email to E. Ganz re outstanding discovery items / Gorman letter	1.00	\$600.00	\$600.00								
	2/19/2020	BU	Email correspondence with A. Fearn re depo prep	0.30	\$600.00	\$180.00								
	2/19/2020	BU	Email correspondence with K. Ellis re communications with E. Ganz	0.40	\$600.00	\$240.00								
	2/19/2020	BU	Review file for response to CH re Ganz reviewing complaint / allegations re authority as POA to sign residency agreement and email to CH re same	1.40	\$600.00	\$840.00								
	2/19/2020	BU	Conversation with A. Castillo re call back for Sunrise caller from CO	0.30	\$600.00	\$180.00			0.3	180				
	2/19/2020	BU	Review Ganz transcript for answers to Gorman's questions	1.00	\$600.00	\$600.00								
	2/19/2020	BU	Draft letter to defense responding to Ganz deposition questions	1.00	\$600.00	\$600.00								
	2/20/2020	BU	A. Fearn depo prep at Schneider Wallace	4.50	\$600.00	\$2,700.00								
	2/20/2020	KAS	Review summary of Fearn depo prep from BU	0.20	\$795.00	\$159.00								
	2/20/2020	BU	Draft letter to Gorman re Ganz discovery	1.50	\$600.00	\$900.00								
	2/20/2020	BU	Email summary of Fearn depo prep to KAS	0.30	\$600.00	\$180.00								
	2/20/2020	KAS	Email to CH re Sunrise - Ganz	0.20	\$795.00	\$159.00								
	2/20/2020	BU	Phone call with E. Ganz re additional discovery questions / Gorman letter	0.90	\$600.00	\$540.00								
	2/20/2020	BU	Correspondence with E. Ganz re receipt/review of Complaint(s), depo testimony, production of documents and meeting re same, depo errata/review	0.70	\$600.00	\$420.00								
	2/21/2020	BU	Email to J. Gorman re Ganz discovery	0.20	\$600.00	\$120.00								
	2/21/2020	BU	Further edits to letter to Gorman re Ganz discovery	1.20	\$600.00	\$720.00								
	2/21/2020	BU	Correspondence with CH re letter to Gorman re Ganz discovery	0.30	\$600.00	\$180.00								
	2/21/2020	BU	Draft bullet points for A. Fearn depo prep and forward same to GW	0.80	\$600.00	\$480.00								
	2/23/2020	BU	Edit and send bullet points to A. Fearn re depo prep	0.40	\$600.00	\$240.00								
	2/24/2020	BU	Forward last 2 doc productions to J. Dion for upload to Relativity	0.20	\$600.00	\$120.00			0.2	120				
	2/24/2020	BU	Review Ganz depo transcript and prepare errata	2.00	\$600.00	\$1,200.00								
	2/24/2020	KAS	Calls and texts w/Ganz	0.20	\$795.00	\$159.00								
	2/25/2020	BU	Text to E. Ganz re meeting schedule	0.20	\$600.00	\$120.00			0.2	120				
	2/25/2020	BU	Review Ganz transcript and prepare errata	5.20	\$600.00	\$3,120.00								
	2/26/2020	KAS	Emails to CH and BU re Sunrise - Ganz	0.30	\$795.00	\$238.50								
	2/26/2020	BU	draft supplemental responses to Ganz discovery	3.00	\$600.00	\$1,800.00								
	2/26/2020	BU	Phone call with CH re Ganz errata	0.50	\$600.00	\$300.00								
	2/26/2020	BU	Depo prep call with A. Fearn and GW	0.80	\$600.00	\$480.00								
	2/26/2020	BU	Phone call with E. Ganz re tomorrow's meeting	0.30	\$600.00	\$180.00								
	2/27/2020	BU	E. Ganz discovery meeting	2.00	\$600.00	\$1,200.00								
	2/27/2020	BU	Travel to E. Ganz discovery meeting	1.50	\$600.00	\$900.00								1.5
	2/28/2020	BU	A. Fearn depo at Schneider Wallace	9.50	\$600.00	\$5,700.00								
	2/28/2020	BU	Brief email summary of Fearn depo	0.30	\$600.00	\$180.00								
	3/2/2020	BU	Review new Ganz docs and prepare for production	0.40	\$600.00	\$240.00								
	3/2/2020	BU	Redact / prepare Fearn notes for production	0.70	\$600.00	\$420.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked	Fees	General Hrs	Fees						
3/2/2020	KAS	Emails to CH and BU re Order on Motion for Relief	0.60	\$795.00	\$477.00								
3/2/2020	KAS	Email to CH/Ann Williams/BU re Sunrise Stebner Declaration	0.20	\$795.00	\$159.00								
3/2/2020	KAS	Draft and file declaration ISO Motion for Relief	1.20	\$795.00	\$954.00								
3/2/2020	BU	Phone calls with KAS re declaration re NYT article	0.50	\$600.00	\$300.00								
3/2/2020	BU	Compile pertinent materials for NYT article declaration and email to KAS	2.70	\$600.00	\$1,620.00			0.7	420				
3/2/2020	KAS	Fwd emails to GW/S. Wallace/CH/BU re Stebner Declaration	0.20	\$795.00	\$159.00								
3/3/2020	KAS	Email to CH re 10am Pacific call	0.10	\$795.00	\$79.50			0.1	79.5				
3/3/2020	BU	Draft KAS response letter to defense letter re NY Times article	1.80	\$600.00	\$1,080.00								
3/3/2020	BU	Team call re discovery status / strategy	0.70	\$600.00	\$420.00					0.2	120		
3/3/2020	BU	Download newest doc production and prepare for upload to Relativity and send same to J. Dion for upload	0.20	\$600.00	\$120.00			0.2	120				
3/3/2020	BU	Prepare new Ganz docs for production (scan, final review)	0.80	\$600.00	\$480.00			0.3	180				
3/3/2020	KAS	Fwd email to CH/BU/AW/GW re Summary of ECF Activity	0.10	\$795.00	\$79.50			0.1	79.5				
3/4/2020	BU	Phone call with KAS re edits to letter and circulate same to KAS, GW	0.30	\$600.00	\$180.00								
3/4/2020	KAS	Emails to BU re Stebner Declaration	0.50	\$795.00	\$397.50								
3/4/2020	BU	Phone calls with GW re KAS letter	0.40	\$600.00	\$240.00								
3/4/2020	KAS	Phone call w/BU re edits to letter	0.30	\$795.00	\$238.50								
3/4/2020	KAS	Emails to BU re Sunrise letter	0.20	\$795.00	\$159.00								
3/4/2020	BU	Bates label new Ganz docs for production	1.50	\$600.00	\$900.00			1.5	900				
3/4/2020	BU	Add section to KAS letter re communications with putative class members	0.50	\$600.00	\$300.00								
3/5/2020	BU	Index newest Plaintiff doc production	1.10	\$600.00	\$660.00			0.5	300				
3/5/2020	BU	Prepare document production for service (additional redaction) and serve	0.40	\$600.00	\$240.00			0.4	210				
3/5/2020	BU	Finalize KAS letter re NY Times article and send	0.30	\$600.00	\$180.00								
3/5/2020	KAS	Email correspondence w/BU re index of newest P doc production	0.50	\$795.00	\$397.50								
3/5/2020	BU	Trouble-shoot 3d party doc production on Relativity	0.50	\$600.00	\$300.00			0.5	300				
3/6/2020	BU	Draft Ganz Set 2 responses	5.70	\$600.00	\$3,420.00								
3/6/2020	KAS	Email to GK re Media query for article about Heredia et al. v. Sunrise Senior Living, LLC - response requested March 10	0.30	\$795.00	\$238.50								
3/9/2020	BU	Emails/texts with KAS, E. Ganz re meeting re depo errata	0.20	\$600.00	\$120.00								
3/9/2020	BU	Emails with J. Dion re document production issues	0.20	\$600.00	\$120.00			0.2	120				
3/9/2020	KAS	Email/texts with BU and E. Ganz re meeting re depo errata.	0.20	\$795.00	\$159.00								
3/9/2020	KAS	Phone call w/BU re Ganz errata, meeting schedule	0.30	\$795.00	\$238.50								
3/9/2020	BU	Draft Ganz Set 2 responses (Rogs)	5.30	\$600.00	\$3,180.00								
3/9/2020	BU	Phone call with KAS re Ganz errata, meeting schedule	0.30	\$600.00	\$180.00								
3/9/2020	KAS	Calls and texts w/Ganz re deposition	0.40	\$795.00	\$318.00								
3/9/2020	BU	Email correspondence with MY, SW re staffing / bad outcomes, for discovery responses	0.20	\$600.00	\$120.00								
3/10/2020	BU	Draft/finalize Ganz Set 2 responses (Rogs/RPDs) and forward to team for review/comment	4.50	\$600.00	\$2,700.00								
3/10/2020	BU	Legal research re same including work product and protected communications	2.00	\$600.00	\$1,200.00								
3/10/2020	BU	Emails with technical staff re document production issues; email to defense counsel re same.	0.40	\$600.00	\$240.00			0.4	240				
3/10/2020	BU	Response to reporter inquiry re case and forward same to KAS, GK	0.50	\$600.00	\$300.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs	Falkenberg	Travel	
					Worked	Fees	General	Fees				
							Hrs	Fees	Hrs	Fees	Hrs	Fees
	3/11/2020	KAS	Calls and texts w/Ganz	0.90	\$795.00	\$715.50						
	3/11/2020	BU	Edits to Ganz depo errata	0.60	\$600.00	\$360.00						
	3/11/2020	BU	Prepare new Ganz docs for production - RPD Set 2	1.00	\$600.00	\$600.00						
	3/12/2020	BU	Phone call with DM re RPD responses	0.20	\$600.00	\$120.00						
	3/12/2020	KAS	Call w/ Elise Ganz	0.50	\$795.00	\$397.50						
	3/12/2020	BU	Email correspondence with KAS re new Sunrise article	0.50	\$600.00	\$300.00			0.5	300		
	3/12/2020	KAS	Call w/Ganz and review docs	0.50	\$795.00	\$397.50						
	3/12/2020	KAS	Email correspondence w/BU re new sunrise article	0.50	\$795.00	\$397.50			0.5	397.5		
	3/12/2020	BU	email correspondence with GW re Fearn depo / letter from defense re same	0.50	\$600.00	\$300.00						
	3/12/2020	KAS	Phone call w/BU and E. Ganz re depo errata	0.50	\$795.00	\$397.50						
	3/12/2020	BU	Phone call with KAS, E. Ganz re depo errata	0.50	\$600.00	\$300.00						
	3/12/2020	BU	Further edits to ROGs/RPDs	6.00	\$600.00	\$3,600.00						
	3/12/2020	BU	Download and forward SUN010 native files to J. Dion for upload to Relativity	0.30	\$600.00	\$180.00			0.3	180		
	3/13/2020	BU	Prepare docs for production (CCL records)	3.00	\$600.00	\$1,800.00			1.5	900		
	3/13/2020	BU	Edits to RPD responses	0.70	\$600.00	\$420.00						
	3/13/2020	KAS	Errata document meeting w/Ganz	1.70	\$795.00	\$1,351.50						
	3/13/2020	BU	Phone call with E. Ganz re doc production	0.20	\$600.00	\$120.00						
	3/16/2020	BU	Serve Ganz depo errata	0.20	\$600.00	\$120.00						
	3/16/2020	BU	Finalize discovery responses / doc productions and serve	3.80	\$600.00	\$2,280.00						
	3/16/2020	KAS	Call w/BU and E. Ganz re depo errata	0.30	\$795.00	\$238.50						
	3/16/2020	BU	Prepare Ganz errata docs for KAS and send	0.60	\$600.00	\$360.00						
	3/16/2020	KAS	Calls and texts w/Ganz	0.40	\$795.00	\$318.00						
	3/16/2020	BU	Call with E. Ganz, KAS re depo errata	0.30	\$600.00	\$180.00						
	3/16/2020	KAS	Email with BU re 30(b)(6) depo and Fwd to E. Ganz re errata	0.20	\$795.00	\$159.00						
	3/16/2020	BU	Email correspondence with DM re doc production	0.20	\$600.00	\$120.00						
	3/18/2020	BU	Email correspondence with A. Fearn re depo continuation	0.20	\$600.00	\$120.00						
	3/19/2020	BU	Email to J. Gorman re Ganz errata, preservation communications with clients	0.40	\$600.00	\$240.00						
	3/19/2020	BU	Forward P document productions to T. Myrick	0.30	\$600.00	\$180.00			0.3	180		
	3/19/2020	BU	Call with CH, RC, SW, MY re discovery	0.70	\$600.00	\$420.00						
	3/19/2020	BU	Email correspondence to defense re ESI / search terms meet and confer	0.30	\$600.00	\$180.00						
	3/19/2020	BU	Bates label new doc production re 3d party owners and serve	0.70	\$600.00	\$420.00			0.7	420		
	3/19/2020	BU	Download and forward for upload to Relativity text files from SUN010	0.40	\$600.00	\$240.00			0.4	240		
	3/20/2020	BU	Email/text correspondence with GW, A. Fearn re depo continuation	0.20	\$600.00	\$120.00						
	3/22/2020	KAS	Email to BU re Sunrise/Amy Fearn	0.30	\$795.00	\$238.50						
	3/24/2020	BU	Background research re Sunrise lease agreements / management agreements - search public sources including SEC filings	4.50	\$600.00	\$2,700.00						
	3/25/2020	BU	Review DSS files for lease and management agreements	3.00	\$600.00	\$1,800.00						
	3/25/2020	BU	Fact/background research re REITs, triple net lease and other lease types/obligations	1.50	\$600.00	\$900.00						
	3/27/2020	BU	Review journal articles and other responsive information from DM and prepare for production re Ganz RPD Set 2	2.00	\$600.00	\$1,200.00						
	3/27/2020	BU	Work with DM re documents responsive to Ganz RPD Set 2 and email correspondence re same	0.50	\$600.00	\$300.00						

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	3/28/2020	BU	Prepare DM's journal articles for production re Ganz RPD Set 2	1.00	\$600.00	\$600.00								
	3/28/2020	BU	Review M. Maryott M&C letter re ESI / search terms	0.40	\$600.00	\$240.00								
	3/28/2020	BU	Review Ganz/Zack residency agreements for acknowledgement language for class cert brief insert and email to GW re same	1.00	\$600.00	\$600.00								
	3/29/2020	BU	Prepare Marks' journal articles for production re Ganz RPD Set 2	1.70	\$600.00	\$1,020.00			0.7	420				
	3/30/2020	BU	Prepare typed version of Ganz depo errata	0.50	\$600.00	\$300.00			0.5	300				
	3/30/2020	BU	Review documents, including discovery documents, for assessment data format re M&C letter re same	1.70	\$600.00	\$1,020.00								
	3/30/2020	BU	Review correspondence re potential arbitration plaintiff / class rep and get contact info for same	0.30	\$600.00	\$180.00								
	3/30/2020	BU	Prepare supplemental RPD response and responsive documents for production	1.50	\$600.00	\$900.00								
	3/30/2020	BU	Download / extract class rep residency agreements and forward to GW/MJ, per request for same	0.50	\$600.00	\$300.00			0.5	300				
	3/30/2020	BU	Review J. Gorman email re GW letter to Maryott re Fearn deposition	0.30	\$600.00	\$180.00								
	3/30/2020	BU	Search document repository for production of contract/registry labor data	0.80	\$600.00	\$480.00								
	3/30/2020	BU	Email to GW re existence of arbitration plaintiffs / class reps	0.20	\$600.00	\$120.00								
	3/31/2020	BU	Draft M&C letter re format of assessment data produced to date	2.70	\$600.00	\$1,620.00								
	3/31/2020	BU	Review DM email re problems with assessment data production	0.30	\$600.00	\$180.00								
	3/31/2020	BU	Incorporate DM edits into supplemental RPD response	0.20	\$600.00	\$120.00								
	3/31/2020	BU	Telephone call with absent putative class member re case update	0.30	\$600.00	\$180.00			0.3	180				
	4/1/2020	BU	Proof of service for written discovery responses	0.40	\$600.00	\$240.00			0.4	240				
	4/1/2020	BU	Telephone call with CH, DM, GW re class cert briefing	0.30	\$600.00	\$180.00								
	4/2/2020	BU	Email correspondence with CH, GW re deposition exhibits	0.20	\$600.00	\$120.00								
	4/2/2020	BU	Review document repository and corresponding research re daily census data	2.00	\$600.00	\$1,200.00								
	4/3/2020	BU	Revised, typed version of Ganz depo errata	0.40	\$600.00	\$240.00			0.4	240				
	4/3/2020	BU	Phone conversation with GW re Ganz	0.20	\$600.00	\$120.00								
	4/3/2020	BU	Conference call with CH, R. Cocchia, SW, MY re discovery / M&C letter	0.50	\$600.00	\$300.00								
	4/3/2020	BU	Determine date of organization / ownership chart contained in DSS records per CH request	0.40	\$600.00	\$240.00								
	4/3/2020	BU	Finalize Ganz's responses to 2d set of RPDs, including POS	1.00	\$600.00	\$600.00								
	4/5/2020	KAS	Emails to CH re additional thoughts re timing	0.30	\$795.00	\$238.50								
	4/6/2020	BU	Putative class member phone call / inquiry response and follow up email because could not leave message	0.20	\$600.00	\$120.00			0.2	120				
	4/6/2020	BU	CH-assigned project re Daily Labor Report data	2.50	\$600.00	\$1,500.00								
	4/7/2020	BU	Telephone call with putative class member - case/fact background, information gathering	1.00	\$600.00	\$600.00			0.5	300				
	4/8/2020	BU	Email summary of telephone call with putative class member contact to GK, KAS	0.30	\$600.00	\$180.00								
	4/9/2020	BU	Email correspondence with CH re privilege log and ESI M&C letter	0.20	\$600.00	\$120.00								
	4/9/2020	BU	Draft email to J. Gorman re privilege log proposal	0.20	\$600.00	\$120.00								
	4/9/2020	BU	Review Ops Manual re daily labor reporting	0.20	\$600.00	\$120.00								
	4/9/2020	BU	Email to GW re Fearn depo errata, privilege log	0.20	\$600.00	\$120.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
						General Hrs	Fees						
4/10/2020	BU	Draft search strings re budget variances and DSS-related documents	1.30	\$600.00	\$780.00								
4/10/2020	BU	Telephone call with GK re DSS/Sunrise DSS-related productions	0.30	\$600.00	\$180.00			0.3	180				
4/10/2020	BU	Email to R. Cocchia, CH re DSS document productions	0.10	\$600.00	\$60.00								
4/10/2020	BU	Review draft stip on class cert schedule and email to GW re same.	0.20	\$600.00	\$120.00								
4/14/2020	BU	Draft M&C letter re problems with production of PDF assessment data	2.50	\$600.00	\$1,500.00								
4/14/2020	BU	Forward Ps' depo transcripts to T. Myrick	0.20	\$600.00	\$120.00			0.2	120				
4/15/2020	BU	CH-assigned project re Residency Agreement differences for class cert declaration and exhibit	5.50	\$600.00	\$3,300.00								
4/15/2020	BU	Review case file for KK research on Sunrise assessment issues	0.40	\$600.00	\$240.00			0.2	120				
4/15/2020	BU	Telephone conversation with CH re assessment / residency agreement exhibit for class certification declaration	0.30	\$600.00	\$180.00								
4/16/2020	BU	Email correspondence with DM, CH re format of assessment data production	0.40	\$600.00	\$240.00								
4/16/2020	BU	Review DM correspondence re issues with Ds' production of assessment/payroll data overall		\$600.00	\$0.00								
4/16/2020	BU	Email correspondence with CH, GW re privilege log	0.20	\$600.00	\$120.00								
4/16/2020	BU	Review residency agreements attached to Blood declaration and compare to Ganz/Zack residency agreements	4.30	\$600.00	\$2,580.00								
4/16/2020	BU	Revisions to CH declaration and class cert exhibit re Sunrise residency agreements	0.60	\$600.00	\$360.00								
4/16/2020	BU	Email correspondence with CH re same re CH class certification declaration	0.10	\$600.00	\$60.00								
4/16/2020	BU	Review Sunrise privilege log from DSS production	0.20	\$600.00	\$120.00								
4/16/2020	BU	Review Fearn depo binder index for preparation of Fearn privilege log	0.20	\$600.00	\$120.00								
4/19/2020	BU	Review Oakmont email correspondence for estimate from Torrey Partners re assessment/payroll data conversion and forward same to CH	0.30	\$600.00	\$180.00								
4/20/2020	BU	Edits to Fearn privilege log per GW comments and serve	0.50	\$600.00	\$300.00								
4/20/2020	BU	Retrieve/review CH email re depo errata argument for clarifying testimony	0.30	\$600.00	\$180.00								
4/20/2020	BU	Further edits to assessment data M&C letter including new DM issues re payroll data, quarterly / monthly staffing reports, and task time studies; circulate to group	4.00	\$600.00	\$2,400.00								
4/20/2020	BU	Review cases cited in Ds' letter re depo errata argument for changing testimony	1.00	\$600.00	\$600.00								
4/20/2020	BU	Legal research re contrary position on depo errata	2.50	\$600.00	\$1,500.00								
4/21/2020	BU	Legal research re permissible depo errata	2.70	\$600.00	\$1,620.00								
4/21/2020	BU	Draft memo and M&C letter re same and forward to GW, CH	4.00	\$600.00	\$2,400.00								
4/21/2020	BU	Draft email re withdrawal of Ganz errata, per CH email	0.50	\$600.00	\$300.00								
4/21/2020	BU	Phone call with GW re strategy for responding to defense and schedule re further M&C on Fearn privilege log and depo issues, Ganz errata	0.30	\$600.00	\$180.00								
4/21/2020	BU	Troubleshoot doc production / Relativity issue and email explanation to SW, R. Bonner	0.40	\$600.00	\$240.00			0.4	240				
4/23/2020	BU	Team call re class cert prep / strategy	0.90	\$600.00	\$540.00					0.2	120		

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs	Falkenberg	Travel	
					Worked	Fees	General	Fees				
							Hrs	Fees	Hrs	Fees	Hrs	Fees
	4/23/2020	BU	Email correspondence with GW, CH, R. Cochia re meet and confer strategy on class rep depo issues / outstanding discovery	0.30	\$600.00	\$180.00						
	4/23/2020	BU	Draft email to defense re class rep depo issues / outstanding discovery	0.20	\$600.00	\$120.00						
	4/23/2020	BU	Draft letter to defense re confidential docs to be used as exhibits in class cert papers as M&C per local rule	1.00	\$600.00	\$600.00						
	4/23/2020	BU	Review Protective Order and Local Rule 79-5 re filing under seal, in advance of this morning's team call	0.60	\$600.00	\$360.00			0.6	360		
	4/24/2020	BU	Phone call with GW re scheduled M&C on Fearn depo issues	0.20	\$600.00	\$120.00						
	4/24/2020	BU	Targeted searches / review / coding for hot documents re labor reporting, staffing, scheduling, common move-in procedures	5.20	\$600.00	\$3,120.00						
	4/24/2020	BU	Review correspondence and documents for core assessment tool and assessment tool used for named plaintiffs and email to GW re same.	0.70	\$600.00	\$420.00						
	4/24/2020	BU	Review Ds' privilege log and complaint docs referenced therein and email to SW, CH, R. Cochia, GW re same	0.30	\$600.00	\$180.00						
	4/27/2020	BU	Review M&C/discovery correspondence from J. Gorman	0.40	\$600.00	\$240.00						
	4/27/2020	BU	Conference call / goto meeting re assessment data entry project	0.70	\$600.00	\$420.00						
	4/27/2020	BU	Email correspondence with J. Carino re assessment project - details, timeline	0.20	\$600.00	\$120.00			0.2	120		
	4/28/2020	BU	Relativity searches re docs relevant to 30(b)(6) witness Jeff Slichta	6.50	\$600.00	\$3,900.00						
	4/28/2020	BU	Email correspondence with SW, T. Myrick re 30(b)(6) videotaped depo logistics (re exhibits, etc.)	0.30	\$600.00	\$180.00			0.3	180		
	4/29/2020	BU	Email correspondence with team re discovery M&C scheduling and email to defense re same	0.30	\$600.00	\$180.00						
	4/29/2020	BU	Review 4/27 M&C letter re P's responses to Ganz RPD Set 2	0.50	\$600.00	\$300.00						
	4/29/2020	BU	Review cases cited in Ds' 4/27 M&C letter re DM declaration / privilege waiver	2.00	\$600.00	\$1,200.00						
	4/29/2020	BU	Pull assigned assessments for J. Carino re assessment / class cert project	0.70	\$600.00	\$420.00			0.7	420		
	4/29/2020	BU	email to JT re 2 page assessment, re assessment review project	0.30	\$600.00	\$180.00			0.3	180		
	4/29/2020	BU	Draft response to Ds' 4/27 M&C letter	1.30	\$600.00	\$780.00						
	4/29/2020	BU	Legal research re issues raised in 4/27 M&C letter	3.00	\$600.00	\$1,800.00						
	4/30/2020	BU	Spot review of newest doc productions (SUN021, SUN022)	1.50	\$600.00	\$900.00						
	4/30/2020	BU	Update residency agreement chart (class cert exhibit) with new info from latest doc production	1.20	\$600.00	\$720.00						
	4/30/2020	BU	Draft response to ROG portion of Ds' 4/27 M&C letter	1.40	\$600.00	\$840.00						
	4/30/2020	BU	Further email correspondence re discovery M&C scheduling	0.20	\$600.00	\$120.00			0.2	120		
	4/30/2020	BU	Draft response to RPD portion of Ds' 4/27 M&C letter	1.50	\$600.00	\$900.00						
	4/30/2020	BU	Draft response to RPD Set 3	0.50	\$600.00	\$300.00						
	5/1/2020	BU	Edits to draft response to RPD portion of Ds' M&C letter - distinguish cases	1.00	\$600.00	\$600.00						
	5/1/2020	BU	Email to JT re J. Carino's assessment project question re categories not included in template	0.60	\$600.00	\$360.00						
	5/1/2020	BU	Phone call with GW re discovery / DSS productions	0.10	\$600.00	\$60.00						
	5/1/2020	BU	Review Slichta / 30(b)(6) depo transcript re class cert briefing / exhibits	0.60	\$600.00	\$360.00						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked	Fees	General Hrs	Fees						
		Draft M&C letter re confidential designations per CD Cal local rule in advance of class cert filing, including review of depo exhibits for determination of over designations.	4.00	\$600.00	\$2,400.00								
5/1/2020	BU	Email communications with team / defense re M&C scheduling	0.20	\$600.00	\$120.00			0.2	120				
5/4/2020	BU	Review M&C correspondence and related notes in preparation for telephonic M&C tomorrow	2.00	\$600.00	\$1,200.00								
5/4/2020	BU	Draft insert for M&C letter on Sunrise's failure to produce docs from related Shiferaw litigation	0.50	\$600.00	\$300.00								
5/5/2020	BU	Telephone call with GW re discovery M&C	0.10	\$600.00	\$60.00								
5/5/2020	BU	Forward newest Sunrise document productions to R. Bonner for upload to Relativity	0.30	\$600.00	\$180.00								
5/5/2020	BU	Telephonic meet and confer: ESI, assessment data, privilege logs, Ganz errata, Fearn depo issues	1.50	\$600.00	\$900.00								
5/6/2020	BU	Email correspondence with R. Bonner, T. Myrick re Relativity document uploads	0.30	\$600.00	\$180.00			0.3	180				
5/6/2020	BU	Review draft Flores declaration in support of class cert	0.40	\$600.00	\$240.00								
5/6/2020	BU	Email summary of 5/5 discovery meet and confer and send same to R. Cocchia	0.50	\$600.00	\$300.00								
5/6/2020	BU	Document research re Reminiscence admission qualifications/procedure and email to CH re same	1.00	\$600.00	\$600.00								
5/6/2020	BU	Draft letter re withdrawal of Ganz errata and email to team re same	0.40	\$600.00	\$240.00								
5/6/2020	BU	Draft letter re responses to RPD/ROG Set 2	0.60	\$600.00	\$360.00								
5/6/2020	BU	Draft letter to counsel re confidential documents to be filed under seal or in public record in connection with class certification, per local rule	0.70	\$600.00	\$420.00								
5/7/2020	BU	Redact and amend Ganz errata and forward same to defense and court reporter with letter re same	1.00	\$600.00	\$600.00			0.5	180				
5/7/2020	BU	Email correspondence with R. Bonner, T. Myrick re Relativity document uploads	0.30	\$600.00	\$180.00			0.3	180				
5/7/2020	BU	Phone call with GW re M&C letter on Set 2 responses	0.50	\$600.00	\$300.00								
5/7/2020	BU	Further edits to M&C letter on Set 2 responses, including legal research re premature contention interrogatories	2.00	\$600.00	\$1,200.00								
5/7/2020	BU	Email to CH re contents/explanation of "DLR Extract" report	0.40	\$600.00	\$240.00								
5/7/2020	BU	Email correspondence with defense re Ps' response to M&C letter re written discovery	0.10	\$600.00	\$60.00								
5/7/2020	BU	Edits to confidentiality designation letter and email to CH, GW re same	0.60	\$600.00	\$360.00								
5/7/2020	BU	Email correspondence with GW, DM re production of documents responsive to Sunrise's Set 2 requests	0.40	\$600.00	\$240.00								
5/7/2020	BU	Review MT memo re important points from Sunrise Operations Manual re class cert	0.50	\$600.00	\$300.00								
5/8/2020	BU	Email correspondence with GW re Fearn/Ganz declarations iso class certification	0.20	\$600.00	\$120.00								
5/8/2020	BU	Email correspondence with MY re class member declarant declaration facts for respite stay residents and attaching Zack residency agreement	0.70	\$600.00	\$420.00			0.2	120				
5/8/2020	BU	Review document productions for Terrace Club / Edna Place points / allocated hours / service categories and email to team re same	1.50	\$600.00	\$900.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg	Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	
	5/8/2020	BU	Email correspondence with team re draft response to defense re request for telephonic meet and confer and scheduling same	0.30	\$600.00								
	5/8/2020	BU	Review email correspondence among team re structure and content of Flores declaration in support of class certification	0.40	\$600.00								
	5/8/2020	BU	Further edits to M&C letter on Set 2 responses, including legal research re premature contention interrogatories, following discussion of draft with GW	2.50	\$600.00								
	5/10/2020	BU	Email correspondence with GW re exemplar class representative declarations in support of class certification	0.50	\$600.00								
	5/10/2020	BU	Review GW's draft supplemental interrogatory responses to Nos. 20-21	0.20	\$600.00								
	5/10/2020	BU	Email correspondence with GW, MJ re supplemental interrogatory responses to Nos. 20-21	0.10	\$600.00								
	5/10/2020	BU	Email correspondence with GW re M&C schedule	0.20	\$600.00								
	5/11/2020	BU	Review additional examples of class representative declarations in support of class certification, for use in drafting Fearn/Ganz declarations	0.50	\$600.00								
	5/11/2020	BU	Draft Declaration of Elise Ganz in support of Ps' motion for class certification	5.20	\$600.00								
	5/11/2020	BU	Pull exemplar form residency agreements to attach to CH declaration in support of class certification	0.50	\$600.00								
	5/11/2020	BU	Targeted searches / review of discovery documents for specific services and hours allotted in Sunrise's tiered points/level system, re Flores support for class certification	1.70	\$600.00								
	5/11/2020	BU	Email correspondence among team re availability for telephonic M&C on Ps' Set 2 responses and email to defense re same	0.30	\$600.00								
	5/11/2020	BU	Further edits to letter to defense re documents designated confidential for use in Ps' class certification papers, based on updated draft of CH class certification declaration and circulate to team	1.50	\$600.00								
	5/11/2020	BU	Email correspondence with CH, GW re Protective Order and "compelling reasons" to file under seal, in connection with M&C letter per local rule re same	0.40	\$600.00								
	5/11/2020	BU	Further edits to M&C letter on Set 2 responses re putative class member documents	1.20	\$600.00								
	5/11/2020	BU	Email to MY re M&C letter on Set 2 responses re putative class member documents / creation of privilege log	0.30	\$600.00								
	5/11/2020	BU	Finalize and circulate to team for approval and serve on defense with attachments	0.20	\$600.00								
	5/11/2020	BU	Telephonic M&C re Ps' Set 2 responses and Sunrise's production of ESI / search terms / custodians	0.70	\$600.00								
	5/11/2020	BU	Follow up phone call with R. Cocchia re M&C re Ps' Set 2 responses and Sunrise's production of ESI / search terms / custodians	0.20	\$600.00								
	5/12/2020	BU	Draft response to counsel concerning request to supplement privilege log and circulate to team for comment and send to counsel.	0.50	\$600.00								
	5/12/2020	BU	Email correspondence with T. Myrick, L. Valdez re CH declaration exhibits / numbering and forwarding spreadsheets re same	0.40	\$600.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs	Fees						
		Email correspondence with A. Ruppert re deposition excerpting project iso class certification motion	0.20	\$600.00	\$120.00									
5/12/2020	BU	Telephone call with GW re draft Ganz class cert declaration	1.00	\$600.00	\$600.00						0.5	300		
5/12/2020	BU	Further edits to Ganz class certification declaration following call with GW	0.30	\$600.00	\$180.00									
5/12/2020	BU	Edits to confidentiality / under seal letter to omit argument that class certification is a "dispositive motion"	0.50	\$600.00	\$300.00									
5/12/2020	BU	Draft Declaration of Amy Fearn in support of Plaintiffs' motion for class certification	3.00	\$600.00	\$1,800.00									
5/12/2020	KAS	Email to CH re Stebner's Contract	0.20	\$795.00	\$159.00			0.2	159					
5/12/2020	BU	Email correspondence with CH re confidentiality of task time information obtained in other litigation	0.30	\$600.00	\$180.00									
5/12/2020	BU	Draft letter to Aegis/counsel re Sunrise's request for Aegis' confidential information, as required by Protective Order and circulate to team for comment	1.00	\$600.00	\$600.00									
5/12/2020	BU	Email/text correspondence with E. Ganz re draft class certification declaration	0.10	\$600.00	\$60.00									
5/12/2020	BU	Further edits re Ganz re draft class certification declaration	0.40	\$600.00	\$240.00									
5/13/2020	BU	Further edits to confidentiality / under seal letter to Sunrise in connection with documents to be used in connection with Ps' motion for class certification, based on further edits to CH declaration	0.70	\$600.00	\$420.00									
5/13/2020	BU	Further edits to letter to Aegis/counsel re Sunrise's document request seeking Aegis' confidential information and circulate to team	0.60	\$600.00	\$360.00									
5/13/2020	BU	Draft declaration of Amy Fearn in support of Ps' motion for class certification	8.50	\$600.00	\$5,100.00									
5/13/2020	BU	Draft letter to Oakmont/counsel re Sunrise's document requests seeking production of Oakmont's confidential information and circulate to team	0.60	\$600.00	\$360.00									
5/13/2020	BU	Forward highlighted deposition transcripts to expert for review.	0.20	\$600.00	\$120.00									
5/13/2020	BU	Further edits to confidentiality / under seal letter re Sunrise documents to be used in class certification papers based on further revisions to CH declaration and brief	2.00	\$600.00	\$1,200.00									
5/13/2020	BU	Finalize and send to counsel letter detailing confidential documents that may be used in Ps' class certification filing and requesting they be filed in public record	0.30	\$600.00	\$180.00									
5/13/2020	BU	Email correspondence with A. Fearn re draft declaration.	0.10	\$600.00	\$60.00									
5/14/2020	BU	Telephone call with A. Fearn re draft declaration in support of class certification	0.40	\$600.00	\$240.00									
5/14/2020	BU	Further edits re Fearn class certification declaration and circulate	1.10	\$600.00	\$660.00									
5/14/2020	BU	Email correspondence with KAS re letter to Oakmont/counsel re Sunrise's document request for Oakmont's confidential information	0.20	\$600.00	\$120.00									
5/14/2020	KAS	Emails to BU and CH re Amy Fearn Draft Declaration - Belmont Fees	0.50	\$795.00	\$397.50									
5/14/2020	KAS	Email correspondence w/BU re letter to Oakmont/counsel re Sunrise's doc request for Oakmont's confidential info	0.20	\$795.00	\$159.00									

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	5/14/2020	BU	Telephone call with GW re further edits to Fearn class certification declaration	0.40	\$600.00	\$240.00								
	5/14/2020	BU	Further edits to Fearn class certification declaration and recirculate	1.90	\$600.00	\$1,140.00								
	5/14/2020	BU	Targeted searches re Zack move in fee	3.00	\$600.00	\$1,800.00								
	5/14/2020	BU	Email correspondence and telephone calls with CH, A. Fearn, KAS re Zack move in fee	0.50	\$600.00	\$300.00								
	5/14/2020	KAS	Further emails to CH and GW re Amy Fearn Draft Declaration and payment o fees	0.40	\$795.00	\$318.00								
	5/15/2020	BU	Further edits to E. Ganz declaration in support of class certification and forward to E. Ganz and communications re obtaining signature	0.40	\$600.00	\$240.00								
	5/15/2020	BU	Conference call with CH, L. Valdez, MJ and team re filing under seal logistics for Monday's class certification filing	0.70	\$600.00	\$420.00					0.7		420	
	5/15/2020	BU	Follow up calls with MJ, CH re logistics for class certification filing, including under seal	0.30	\$600.00	\$180.00					0.3		180	
	5/15/2020	BU	Telephone call with A. Fearn re further edits to latest version of draft declaration in support of class certification	0.60	\$600.00	\$360.00								
	5/15/2020	KAS	Review draft cover letter from BU for supplemental production of Fearn doc re move in fees/photos	0.70	\$795.00	\$556.50								
	5/15/2020	BU	Email correspondence with MJ re universe of form residency agreements re class certification exhibits and demonstrative	0.20	\$600.00	\$120.00								
	5/15/2020	KAS	Email to KG re Fearn materials	0.20	\$795.00	\$159.00			0.2	159				
	5/15/2020	BU	Draft cover letter for supplemental production of Fearn documents re move in fees / photographs and forward to KAS for review	0.70	\$600.00	\$420.00								
	5/15/2020	BU	Further edits to draft Fearn declaration in support of class certification re move in fees	1.40	\$600.00	\$840.00								
	5/15/2020	BU	Compile and forward to team all work product re Fearn/Zack move in fee paid	0.50	\$600.00	\$300.00								
	5/15/2020	BU	Email correspondence with defense re Sunrise documents required to be filed under seal	1.30	\$600.00	\$780.00								
	5/15/2020	BU	Re-review list of under seal document to narrow and send revised list to defense	0.50	\$600.00	\$300.00								
	5/15/2020	BU	Communications with GW re Fearn declaration	0.20	\$600.00	\$120.00								
	5/15/2020	BU	Further edits to declaration and send to A. Fearn for review	0.50	\$600.00	\$300.00								
	5/15/2020	BU	Communications with GW, CH re further revisions to Fearn declaration based on previous evening's phone call	0.60	\$600.00	\$360.00								
	5/16/2020	BU	Further edits to Fearn declaration in support of class certification and forward to A. Fearn for review/signature	2.70	\$600.00	\$1,620.00								
	5/17/2020	BU	Class certification filing - prepare "conditionally under seal" cover pages and redactions of confidential information	7.50	\$600.00	\$4,500.00			5	3000				
	5/17/2020	BU	Review and redline edits to operative version of class brief and expert declarations	2.00	\$600.00	\$1,200.00								
	5/18/2020	BU	Further edits to application for leave to file under seal, BU declaration in support thereof, and proposed order, based on response from defense requesting certain documents be filed in public record	1.50	\$600.00	\$900.00								
	5/18/2020	BU	Application for leave to file under seal, BU declaration in support thereof, proposed order re same.	3.50	\$600.00	\$2,100.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs	Falkenberg	Travel	Fees
				Worked			General					
Fees							Hrs	Fees	Hrs	Fees	Hrs	Fees
	5/18/2020 BU	Telephone calls and email correspondence with L. Valdez re filing under seal process	0.30	\$600.00	\$180.00				0.3	180		
	5/18/2020 BU	Review local rules re same	0.70	\$600.00	\$420.00				0.7	420		
	5/18/2020 BU	Telephone calls with MJ, GW, CH re filing under seal rules and division of labor/tasks	0.40	\$600.00	\$240.00				0.4	240		
	5/18/2020 BU	Redactions to class brief, CH declaration, expert declarations	3.00	\$600.00	\$1,800.00				3	1800		
	5/18/2020 BU	Email correspondence with defense counsel re Sunrise's final list of documents required to be filed under seal	0.30	\$600.00	\$180.00							
	5/18/2020 KAS	Email correspondence w/BU re letter to Oakmont informing of Sunrise's doc request of Oakmont's confidential info	0.10	\$795.00	\$79.50							
	5/18/2020 KAS	Review briefing for Class Cert Application	1.70	\$795.00	\$1,351.50							
	5/18/2020 KAS	Call with BU re class certification briefing status	0.30	\$795.00	\$238.50				0.3	238.5		
	5/18/2020 BU	Email correspondence with KAS re letter to Oakmont informing of Sunrise's document request seeking Oakmont's confidential information	0.10	\$600.00	\$60.00							
	5/18/2020 BU	Conform PDFs to local rule size requirements re class certification filing	2.50	\$600.00	\$1,500.00				2.5	1500		
	5/18/2020 BU	Redactions to declaration of MY in support of motion for class certification and certain exhibits thereto	0.70	\$600.00	\$420.00				0.7	420		
	5/19/2020 BU	Email correspondence with CH, MJ re potential class certification filing errors	0.10	\$600.00	\$60.00				0.1	60		
	5/19/2020 BU	Telephone call with CH, MJ re potential class certification filing errors	0.40	\$600.00	\$240.00				0.4	240		
	5/19/2020 BU	Highlight redacted portions of Ganz/Fearn declarations, Healey declaration, Yarnall declaration exhibit, expert declarations, and proposed order filed under seal and to be refiled in 14 point font	2.70	\$600.00	\$1,620.00				2.7	1620		
	5/19/2020 BU	Review revised version of class cert brief, amended to 14 point font and conform to page limitations	0.40	\$600.00	\$240.00				0.4	240		
	5/19/2020 BU	Delete/destroy all copies of SUN0004196-0004202 and SUN0004222-0004229 per clawback request and confirm same with L. Valdez	0.50	\$600.00	\$300.00							
	5/19/2020 BU	Email to CH, MJ re M&C letter response re RPD Set 2, putative class member docs and timing of Ps' response	0.20	\$600.00	\$120.00							
	5/20/2020 BU	Review draft email to defense addressing purported deficiencies in Ps' class certification filing and comments re same	0.30	\$600.00	\$180.00				0.3	180		
	5/20/2020 BU	Conference call with CH, MJ, L. Valdez re amended class cert filing	0.40	\$600.00	\$240.00				0.4	240		
	5/20/2020 KAS	Email correspondence w/BU re letter to Oakmont informing of Sunrise's doc request of Oakmont's confidential info	2.00	\$795.00	\$1,590.00				1	795		
	5/20/2020 BU	Email correspondence with KAS re letter to Oakmont/counsel re Sunrise document request seeking Oakmont's confidential information	0.40	\$600.00	\$240.00							
	5/20/2020 BU	Further edits to Oakmont letter ew Sunrise and attach supporting information	1.60	\$600.00	\$960.00							
	5/20/2020 BU	Finalize redacted/highlighted versions of class cert papers filed under seal and revised to 14 point font and circulate to team for final review	2.30	\$600.00	\$1,380.00				2.3	1380		
	5/21/2020 BU	Prep for telephonic meet and confer - draft agenda items for Saturday's phone conference	0.50	\$600.00	\$300.00							

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs	Falkenberg	Travel
					Worked	Fees	General	Fees			
	5/21/2020	BU	Revised/updated application for leave to file under seal, supporting declaration, proposed order re corrected class cert brief filing	1.00	\$600.00	\$600.00			1	600	
	5/21/2020	BU	Email correspondence with defense counsel re class cert filing - redline version of corrected brief in 14 point font and local rules re formatting requirements	0.60	\$600.00	\$360.00			0.6	360	
	5/21/2020	BU	Work with L. Valdez on ECF filing of corrected class certification brief including redactions and highlighting for under seal versions	2.00	\$600.00	\$1,200.00			2	1200	
	5/21/2020	BU	Review local rules re redactions / under seal filings	0.50	\$600.00	\$300.00					
	5/21/2020	BU	Email correspondence with defense counsel re corrected class cert brief, exhibits, and scheduling meet and confer	0.30	\$600.00	\$180.00			0.3	180	
	5/22/2020	BU	Telephone call with CH, MJ re strategy for tomorrow morning's M&C, including Ps' responses to Set 2 requests	0.70	\$600.00	\$420.00					
	5/22/2020	BU	Finalize agenda items and notes re same for tomorrow's telephonic meet and confer and forward to team with related meet and confer correspondence	1.30	\$600.00	\$780.00					
	5/22/2020	BU	Draft meet and confer letter re Ps' responses to Set 2 document requests and interrogatories and forward same to CH	2.50	\$600.00	\$1,500.00					
	5/22/2020	BU	Review Sunrise's draft joint stipulation re deadline to file supporting declaration re motion to seal, redline comments and forward to team	0.60	\$600.00	\$360.00					
	5/22/2020	BU	Review corrected class cert brief and related papers for filing	0.50	\$600.00	\$300.00			0.5	300	
	5/22/2020	BU	Phone call with L. Valdez re corrected class cert brief and related papers for filing	0.20	\$600.00	\$120.00			0.2	120	
	5/23/2020	BU	Index of journal articles produced in response to RPD No. 21 and forward same to defense	1.40	\$600.00	\$840.00					
	5/23/2020	BU	Telephonic meet and confer re outstanding discovery issues, class certification filing and briefing schedule (discovery meet and confer with Sunrise counsel)	1.00	\$600.00	\$600.00					
	5/23/2020	BU	Email summary re same and recirculate draft stip and redline on under seal schedule	0.70	\$600.00	\$420.00					
	5/24/2020	BU	Finalize and serve supplemental Fearn document production re check stub/move in docs	1.00	\$600.00	\$600.00			0.3	180	
	5/26/2020	BU	Email correspondence with DM re journal articles responsive to RPD 21 and other responsive information	1.00	\$600.00	\$600.00					
	5/26/2020	BU	Draft response to Sunrise's RPD Set 3 and circulate to team	0.80	\$600.00	\$480.00					
	5/26/2020	BU	Email correspondence to E. Ganz and A. Fearn updating on the filing of class cert papers and forwarding same	0.40	\$600.00	\$240.00					
	5/26/2020	BU	Email correspondence with E. Ganz re discovery verifications and attaching same	0.30	\$600.00	\$180.00					
	5/26/2020	BU	Email correspondence with defense re scheduling stipulation	0.70	\$600.00	\$420.00					
	5/27/2020	BU	email correspondence with MJ, CH re objections to RPD Set 3; review prior responses, objections re "concerning" and "related to." gather documents responsive to Sunrise's requests for expert materials; email correspondence with MJ, DM, CH re same.	0.60	\$600.00	\$360.00					
	5/27/2020	BU	finalize and serve responses to RPD Set 3.	0.80	\$600.00	\$480.00					
	5/27/2020	BU	email correspondence with E. Ganz re responses to RPD Set 3.	0.30	\$600.00	\$180.00					
	5/27/2020	BU	draft supplemental initial disclosures.	1.20	\$600.00	\$720.00					

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
	5/28/2020 BU	Review supplemental document production in preparation for service	0.40		\$600.00	\$240.00								
	5/28/2020 BU	Review draft letter re reciprocal exchange of expert materials and Rule 26 obligations	0.40		\$600.00	\$240.00								
	5/28/2020 BU	Team call with CH, MJ, DM re expert materials, Healey declaration, strategy	1.60		\$600.00	\$960.00								
	5/28/2020 BU	Email correspondence with DM, MJ, CH re production of expert materials	0.20		\$600.00	\$120.00								
	5/28/2020 BU	Compile list of materials in hand and materials to be gathered	0.80		\$600.00	\$480.00								
	5/29/2020 BU	Review/edit Flores list of testimony provided, in connection with production of expert materials	2.00		\$600.00	\$1,200.00								
	5/29/2020 BU	Email correspondence with J. Gorman re Fearn deposition availability	0.20		\$600.00	\$120.00								
	5/29/2020 BU	Email correspondence with R. Steyer re compilation of privilege log re putative class member communications	0.40		\$600.00	\$240.00								
	5/29/2020 BU	Prepare and finalize Flores and Kennedy expert materials for production and serve	3.50		\$600.00	\$2,100.00								
	5/29/2020 BU	Finalize supplemental responses to ROGs 20, 21 and supplemental doc production (management agreements) and serve	1.00		\$600.00	\$600.00								
	5/29/2020 BU	Email correspondence to MY re preparation of privilege log re putative class member communications	0.40		\$600.00	\$240.00								
	6/1/2020 BU	Email correspondence with MY, R. Foss, R. Steyer re available depo dates for class cert declarants	0.30		\$600.00	\$180.00								
	6/1/2020 BU	Targeted Relativity and internet search re Sunrise CareConnect relation to PointClickCare and email to CH re same	1.00		\$600.00	\$600.00								
	6/1/2020 BU	Forward all discovery propounded to date to DM	0.30		\$600.00	\$180.00			0.3	180				
	6/2/2020 BU	Email correspondence with team re potential document custodians	0.10		\$600.00	\$60.00								
	6/2/2020 BU	Review org charts and depo testimony re same.	0.30		\$600.00	\$180.00								
	6/2/2020 BU	Email correspondence with J. Carino re assessment data project status	0.20		\$600.00	\$120.00			0.2	120				
	6/2/2020 BU	Draft letter re potential custodians / search terms and collection of ESI	2.50		\$600.00	\$1,500.00								
	6/2/2020 BU	Email correspondence with team re class declarant depositions and representation	0.20		\$600.00	\$120.00			0.2	120				
	6/3/2020 BU	Draft letter re potential custodians / search terms and collection of ESI and circulate to team and serve	1.10		\$600.00	\$660.00								
	6/3/2020 BU	Draft meet and confer letter re outstanding document requests	3.80		\$600.00	\$2,280.00								
	6/4/2020 BU	Telephone call with G. Wright (Oakmont counsel) re Oakmont's response to Sunrise's document request seeking confidential information	0.50		\$600.00	\$300.00								
	6/4/2020 BU	Email summary of communication with Oakmont counsel re confidential documents to CH, KAS	0.20		\$600.00	\$120.00								
	6/4/2020 BU	Further research/edits to Flores list of testimony offered, to be produced in connection with reciprocal exchange of expert materials	2.60		\$600.00	\$1,560.00			0.6	360				
	6/4/2020 BU	Review Peters declaration for compliance with protective order	0.40		\$600.00	\$240.00								
	6/5/2020 BU	Review R. Steyer's draft communication log with putative class members	0.90		\$600.00	\$540.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
	6/5/2020 BU	Comments re R. Steyer's draft communication log with putative class members and return to R. Steyer	0.40	\$600.00	\$240.00									
	6/5/2020 BU	Draft letter to Oakmont re compliance with protective order in that case, with regard to Sunrise's document request seeking Oakmont's confidential information	0.50	\$600.00	\$300.00									
	6/5/2020 BU	Email correspondence with DM re Flores expert materials to be produced and forwarding revised list of trial testimony for confirmation	0.30	\$600.00	\$180.00									
	6/5/2020 BU	Email correspondence with CH re supplemental interrogatory responses and meet and confer re same	0.30	\$600.00	\$180.00									
	6/5/2020 BU	Email correspondence with defense counsel re supplementing responses to Rogs 20, 21	0.20	\$600.00	\$120.00									
	6/5/2020 BU	Draft letter re DM acknowledgement of compliance with protective order	0.50	\$600.00	\$300.00									
	6/8/2020 BU	Further edits to supplemental responses to Rogs 15-19 and circulate to team	0.70	\$600.00	\$420.00									
	6/8/2020 BU	Draft declarant/non-declarant privilege logs	8.30	\$600.00	\$4,980.00									
	6/8/2020 BU	Finalize and send letters to G. Wright responding to Oakmont's position on Sunrise's document request seeking Oakmont's confidential information	0.20	\$600.00	\$120.00									
	6/8/2020 BU	Draft email response to defense counsel re Ps' supplemental responses to Rogs 20, 21 and email with CH re same	0.50	\$600.00	\$300.00									
	6/8/2020 BU	Email correspondence with R. Steyer, MY re privilege log status	0.20	\$600.00	\$120.00									
	6/8/2020 BU	Email to defense counsel re timing of supplemental expert production and follow up meet and confer	0.10	\$600.00	\$60.00									
	6/8/2020 BU	Email correspondence with DM, CH, MJ re supplemental expert production / status / timing, meet and confer availability, stip to extend time for taking expert depositions	0.30	\$600.00	\$180.00									
	6/9/2020 BU	Telephone conversation with MY re privilege logs	0.30	\$600.00	\$180.00									
	6/9/2020 BU	Telephone call with MJ re meet and confer on supplemental responses to Rogs 20, 21	0.40	\$600.00	\$240.00									
	6/9/2020 BU	Email correspondence with R. Foss, R. Steyer re putative class member documents, production of same, and privilege logs	0.40	\$600.00	\$240.00									
	6/9/2020 BU	Telephonic meet and confer with J. Gorman re supplemental responses to Rogs 20, 2 (discovery meet and confer with Sunrise counsel)	0.30	\$600.00	\$180.00									
	6/9/2020 BU	Email summary to team re meet and confer with Gorman	0.10	\$600.00	\$60.00									
	6/9/2020 BU	Email correspondence with DM re Flores supplemental expert production	0.20	\$600.00	\$120.00									
	6/9/2020 BU	Prepare additional Flores, Schroyer materials for production and serve	1.60	\$600.00	\$960.00									
	6/9/2020 BU	Draft privilege logs re putative class member communications	2.40	\$600.00	\$1,440.00									
	6/9/2020 BU	Review class declarant docs for privilege and bates stamp for production	6.00	\$600.00	\$3,600.00			1.5	900					
	6/10/2020 BU	Finalize supplemental responses to Rogs 15-19	0.30	\$600.00	\$180.00									
	6/10/2020 BU	Draft privilege logs re putative class member communications	3.00	\$600.00	\$1,800.00									
	6/10/2020 BU	Review class declarant docs for privilege and bates stamp for production	6.10	\$600.00	\$3,660.00			1.5	900					
	6/10/2020 BU	Email correspondence with MY, R. Steyer, R. Foss re draft privilege log	0.30	\$600.00	\$180.00									

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	6/10/2020	BU	Phone call with MJ re privilege log	0.20	\$600.00									
	6/10/2020	BU	Serve privilege log	0.40	\$600.00				0.2	120				
	6/11/2020	BU	Review/comment re draft letter responding to Sunrise's 6/10 letter	0.30	\$600.00									
	6/11/2020	BU	Email correspondence with J. Carino re status of assessment project	0.10	\$600.00				0.1	60				
	6/11/2020	BU	Email summary of meet and confer discussions on Ps' outstanding requests, to respond to Sunrise's 6/10 letter	0.50	\$600.00									
	6/11/2020	BU	Background research re "Residents Rights" language in Sunrise Residency Agreements, re further edits to supplemental responses to Rogs 15-19 and email to CH, GW, MJ re same	0.40	\$600.00									
	6/11/2020	BU	Email to CH, MJ re Rule 33 and number of permissible interrogatories per party	0.40	\$600.00									
	6/11/2020	BU	Telephone call with GW re class cert filing	0.20	\$600.00									
	6/12/2020	BU	Email correspondence to E. Ganz re supplemental rog responses and verifications for same	0.10	\$600.00									
	6/12/2020	BU	Prepare Ganz supplemental rog responses and verification	0.40	\$600.00									
	6/12/2020	BU	Prepare supp responses to Rogs 15-19 for service and proof of service	0.30	\$600.00									
	6/15/2020	BU	Team call re schedule, strategy, class cert, discovery	0.20	\$600.00									
	6/15/2020	BU	Conference call with CH, MJ, R. Cocchia re discovery	0.80	\$600.00									
	6/15/2020	BU	Draft M&C letter re ESI, other outstanding discovery items	1.60	\$600.00									
	6/15/2020	BU	Phone call with E. Ganz re supplemental rog responses	0.40	\$600.00									
	6/15/2020	BU	Further edits to supp rog responses (15-19), proof of service, add verifications and serve	0.30	\$600.00									
	6/16/2020	BU	Draft M&C letter re ESI, other outstanding discovery items	3.60	\$600.00									
	6/16/2020	BU	Email correspondence with CH, MJ re same	0.20	\$600.00									
	6/17/2020	BU	Finalize M&C letter on Ds' doc production issues and send	0.30	\$600.00									
	6/18/2020	BU	Email to MJ, CH re production of expert materials outstanding, in response to defense's proposed stip on expert depo schedule	0.60	\$600.00									
	6/19/2020	BU	Phone call re class cert schedule, discovery, Healey declaration - strategy	1.00	\$600.00									
	6/21/2020	KAS	Email to CH re Sunrise scheduling issues	0.20	\$795.00				0.2	159				
	6/22/2020	BU	Emails with L. Valdez re filing updated Healey declaration under seal	0.20	\$600.00				0.2	120				
	6/22/2020	BU	Prep for M&C re ESI - custodians, daily census, pendant data	1.00	\$600.00									
	6/22/2020	BU	Phone call with L. Valdez re Healey declaration filing	0.20	\$600.00				0.2	120				
	6/22/2020	BU	Edits to under seal papers for Healey declaration filing and redactions to Healey declaration	2.50	\$600.00				2.5	1500				
	6/23/2020	BU	Edits to Initial Disclosures	1.00	\$600.00									
	6/23/2020	BU	Phone call with CH, MJ, GW re ESI, assessments, supp rog responses	0.90	\$600.00									
	6/23/2020	BU	Phone call with GW re supp rog responses	0.20	\$600.00									
	6/23/2020	BU	Draft objections to Flores subpoena	3.70	\$600.00									
	6/23/2020	BU	Phone call with MY re possible new class reps / class declarant depositions	0.30	\$600.00									
	6/24/2020	BU	Draft supp responses to Rogs 20-21	2.50	\$600.00									
	6/24/2020	BU	Email correspondence to defense re Ps' portion of Joint Statement on supp rog responses	0.20	\$600.00									
	6/24/2020	BU	Draft Schroyer subpoena objections	3.20	\$600.00									

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	6/24/2020	BU	Draft Flores subpoena objections	1.50	\$600.00	\$900.00								
	6/24/2020	BU	Edits to supplemental witness disclosures and email same to CH	0.50	\$600.00	\$300.00								
	6/24/2020	BU	Email correspondence with MJ re June 9 M&C re Rogs 20-21	0.30	\$600.00	\$180.00								
	6/25/2020	BU	Emails with MY re class declarant depo tasks and scheduling	0.20	\$600.00	\$120.00								
	6/25/2020	BU	Review M&C letter threatening motion to stay discovery / protective order	0.20	\$600.00	\$120.00								
	6/25/2020	KAS	Phone call w/BU and MY re potential new class reps/class declarant depo prep	0.20	\$795.00	\$159.00								
	6/25/2020	BU	BU declaration in support of Jt Statement on MTC re Rogs 20-21	5.70	\$600.00	\$3,420.00								
	6/25/2020	BU	Phone call with KAS, MY re potential new class reps / class declarant depo prep	0.20	\$600.00	\$120.00								
	6/26/2020	BU	Finalize responses/objections to Flores, Schroyer subpoenas	3.60	\$600.00	\$2,160.00								
	6/26/2020	BU	Phone call with DM re objections to Flores, Schroyer subpoenas	0.40	\$600.00	\$240.00								
	6/26/2020	BU	Emails with R.Foss, MY re class declarant depositions	0.30	\$600.00	\$180.00								
	6/26/2020	BU	Email to A. Allyn re class declarant depositions	0.10	\$600.00	\$60.00								
	6/26/2020	KAS	Email to BU re Depo Prep Zoom and Class Rep p/c Schedule	0.30	\$795.00	\$238.50								
	6/28/2020	KAS	Call BU class declarant depo strategy	0.20	\$795.00	\$159.00								
	6/29/2020	BU	Edits to jt. Statement on Rogs 20-21, BU declaration, and 2d supp rogs	5.30	\$600.00	\$3,180.00								
	6/29/2020	BU	Legal research re absent class member discovery re jt statement on MTC same	4.20	\$600.00	\$2,520.00								
	6/29/2020	BU	Pull Oakmont RealPage subpoena to adapt for PointClick for use in Sunrise	0.30	\$600.00	\$180.00								
	6/29/2020	BU	Objections to Kennedy subpoena	1.50	\$600.00	\$900.00								
	6/29/2020	BU	Strategy call with CH, GW, MJ re discovery motions	0.70	\$600.00	\$420.00								
	6/29/2020	BU	Conf call with potential class rep Temma Roby	0.30	\$600.00	\$180.00								
	6/30/2020	BU	Email correspondence to A. Allyn re outstanding questions relating to Sunrise's most recent doc production	0.10	\$600.00	\$60.00								
	6/30/2020	BU	M&C call re stay, subpoena responses (discovery meet and confer with Sunrise counsel)	2.00	\$600.00	\$1,200.00								
	6/30/2020	BU	Draft opp to joint stmt on putative class member docs, including legal research re same	7.00	\$600.00	\$4,200.00								
	6/30/2020	BU	Edits to class rep retainer agreement	0.40	\$600.00	\$240.00			0.4	240				
	6/30/2020	BU	Email correspondence with GW re edits to class rep retainer agreement and forward to MY, KAS	0.10	\$600.00	\$60.00			0.1	60				
	6/30/2020	BU	Review/finalize BU Declaration ISO opp to MTC re Rogs 20-21	0.50	\$600.00	\$300.00								
	6/30/2020	BU	Email to DM re Flores/Schroyer expert materials	0.30	\$600.00	\$180.00								
	7/1/2020	KAS	Emails to CH/KG re Call Today re Potential New Plaintiffs and Fwd to KF/DZ/GK/SP re same	0.40	\$795.00	\$318.00			0.4	318				
	7/1/2020	BU	Draft BU declaration ISO opp to MTC re putative class members docs	0.50	\$600.00	\$300.00								
	7/1/2020	BU	Conference call re new class rep strategy	1.00	\$600.00	\$600.00					0.5	300		
	7/1/2020	BU	Conference call with MJ, CH re yesterday's M&C	0.50	\$600.00	\$300.00								
	7/1/2020	BU	Conference call w. L. Pettite, CH re Kennedy subpoena	0.40	\$600.00	\$240.00								
	7/1/2020	BU	Conference call with CH re Kennedy subpoena, discovery strategy	0.40	\$600.00	\$240.00								
	7/1/2020	BU	Edits to proposed letter requesting resident files for declarant family members and email to MY re same	0.30	\$600.00	\$180.00								
	7/1/2020	BU	Kennedy subpoena objection edits	0.40	\$600.00	\$240.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
		Draft opp to joint stmt on putative class member docs, including legal research re same	2.50	\$600.00	\$1,500.00								
7/1/2020	BU												
7/1/2020	KAS	Email to CH/GW re Class Representative	0.20	\$795.00	\$159.00								
7/1/2020	BU	Draft objections/responses to Kennedy subpoena	1.60	\$600.00	\$960.00								
		Email correspondence with DM re documents responsive to Flores subpoena	0.20	\$600.00	\$120.00								
7/1/2020	BU	Call with Team regarding new class rep strategy	1.00	\$795.00	\$795.00					0.5	397.5		
7/2/2020	BU	Finalize Kennedy subpoena responses and objections	1.50	\$600.00	\$900.00								
7/2/2020	BU	Draft new set of RPDs for declarant/resident files	2.50	\$600.00	\$1,500.00			0.5	300				
		Opp to MTC re putative class member docs, including phone call with CH re same	2.70	\$600.00	\$1,620.00								
		Email correspondence with DM, CH re Schroyer, Flores expert materials	0.30	\$600.00	\$180.00								
7/2/2020	BU	Email to defense re Schroyer, Flores expert materials	0.20	\$600.00	\$120.00								
		Email correspondence with DM re expert materials / depositions	0.30	\$600.00	\$180.00								
7/6/2020	BU	Revised draft of Jt Stmt re putative class members docs	4.60	\$600.00	\$2,760.00								
7/6/2020	BU	BU Decl ISO Jt Stmt re putative class member docs	3.50	\$600.00	\$2,100.00								
		Email correspondence with MY, RF re class declarant depo schedule	0.20	\$600.00	\$120.00			0.2	120				
7/7/2020	BU	Email correspondence with DM re Schroyer depo logisitics	0.20	\$600.00	\$120.00			0.2	120				
7/7/2020	BU	Emails with TSG re remote depo practice run	0.10	\$600.00	\$60.00			0.1	60				
		Further edits to Jt Stmt on putative class member docs and BU declaration	6.50	\$600.00	\$3,900.00								
		Email correspondence with DM, MJ re further production of expert docs/info	0.20	\$600.00	\$120.00								
7/7/2020	BU	Draft email to defense re further production of expert docs/info	1.00	\$600.00	\$600.00								
7/7/2020	BU	Prepare additional docs for production	0.30	\$600.00	\$180.00								
		Finalize jt statement and BU declaration / exhibits and forward to CH, GW, MJ for review	4.50	\$600.00	\$2,700.00								
7/8/2020	BU	Coordinate with DM, TSG re remote depo demonstration	0.30	\$600.00	\$180.00			0.3	180				
		Email correspondence with team re Schroyer / Flores / Kennedy depo start times	0.30	\$600.00	\$180.00			0.3	180				
7/8/2020	BU	Email to Gibson re Schroyer / Flores / Kennedy depo start times	0.20	\$600.00	\$120.00								
		Review file for RFAs on resident payments and documents evidencing same	0.50	\$600.00	\$300.00								
7/9/2020	BU	Forward Aegis RFAs to CH for reference in Sunrise case	0.10	\$600.00	\$60.00			0.1	60				
		Email correspondence with TSG Reporting, defense counsel, DM re Schroyer depo logistics	0.60	\$600.00	\$360.00								
		Draft insert for M&C letter, concerning Schroyer / expert docs produced in response to subpoena and preparing additional ProModel doc for production	2.60	\$600.00	\$1,560.00								
7/9/2020	BU	Phone call and email correspondence with DM re expert discovery productions	0.40	\$600.00	\$240.00								
7/9/2020	BU	Draft supplemental memorandum on MTC Rogs 20-21	2.00	\$600.00	\$1,200.00								
		Draft BU Declaration in support of supplemental memorandum on MTC Rogs 20-21	0.50	\$600.00	\$300.00								
7/9/2020	BU	Review final versions of Joint Stip on MTC putative class member docs and emails with CH re same	0.50	\$600.00	\$300.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	7/9/2020	BU	Email correspondence with CH, MJ re language for proposed order on MTC assessment data	0.40	\$600.00	\$240.00								
	7/10/2020	BU	Prepare and forward complete set of Kennedy expert docs produced pursuant to subpoena, to CH / GW	0.30	\$600.00	\$180.00			0.3	180				
	7/10/2020	BU	Review draft email to defense re discovery conference	0.10	\$600.00	\$60.00								
	7/10/2020	BU	Email to MJ re same and ESI protocol	0.10	\$600.00	\$60.00								
	7/10/2020	BU	Email correspondence with L. Pettite re amounts paid/billed spreadsheet	0.20	\$600.00	\$120.00								
	7/10/2020	BU	Prepare Kennedy attachment for production and produce to Sunrise	0.60	\$600.00	\$360.00								
	7/10/2020	BU	Review defense letter re Kennedy docs produced pursuant to subpoena	0.20	\$600.00	\$120.00								
	7/10/2020	BU	Review Kennedy summary of amounts billed/paid	0.40	\$600.00	\$240.00								
	7/10/2020	BU	Email correspondence with L. Pettite re same.	0.10	\$600.00	\$60.00								
	7/10/2020	BU	Email correspondence with defense re Kennedy depo logistics	0.30	\$600.00	\$180.00								
	7/10/2020	BU	Prepare supplemental response to Kennedy subpoena attaching Oakmont Declaration ISO Preliminary Settlement Approval	0.70	\$600.00	\$420.00								
	7/10/2020	BU	Draft letter restating Ps' request for resident files and providing available depo dates for the class declarants	2.00	\$600.00	\$1,200.00			1	300				
	7/13/2020	BU	Email correspondence with R. Steyer, MY re class declarant depo dates	0.30	\$600.00	\$180.00			0.3	180				
	7/13/2020	BU	Email to MY, R. Foss attaching class rep depo prep notes, outlines	0.20	\$600.00	\$120.00								
	7/13/2020	BU	Conference call with CH, GW, MJ re outstanding discovery / strategy	0.60	\$600.00	\$360.00								
	7/14/2020	BU	Phone call with MJ re M&C letter concerning Ps' Set 6 document requests	0.30	\$600.00	\$180.00								
	7/14/2020	BU	Review Kennedy Depo Ex and compare to Form Residency Agreements for differences and email to CH re same	0.40	\$600.00	\$240.00								
	7/14/2020	BU	Meet and confer letter re current status of discovery, outstanding ESI and other RFPs	2.00	\$600.00	\$1,200.00								
	7/14/2020	BU	Outline of relevancy of Set 6 requests and forward to MJ with Jan 30 discovery order	2.50	\$600.00	\$1,500.00			0.5	300				
	7/15/2020	BU	Team call re strategy for M&C re appointment of discovery referee	0.50	\$600.00	\$300.00					0.4	240		
	7/15/2020	BU	Review Kennedy depo transcript	1.30	\$600.00	\$780.00			0.3	180				
	7/15/2020	BU	Edits to statement on appointment of discovery referee and forward to CH, MJ, GW	0.70	\$600.00	\$420.00								
	7/15/2020	BU	Emails with DM, TSG Reporting, re depo logistics for remote Flores depo	0.30	\$600.00	\$180.00					0.3	180		
	7/15/2020	BU	Review defense letter responding to request for resident files	0.20	\$600.00	\$120.00								
	7/15/2020	BU	Email to MY re authorizations for request for resident files	0.10	\$600.00	\$60.00								
	7/15/2020	BU	Telephonic M&C re appointment of discovery referee (discovery meet and confer with Sunrise counsel)	0.60	\$600.00	\$360.00								
	7/15/2020	BU	Email summary of M&C re appointment of discovery referee	0.20	\$600.00	\$120.00								
	7/15/2020	BU	Email correspondence with DM re Flores expert document production, including privileged or (work product) protected communications	0.20	\$600.00	\$120.00								
	7/16/2020	BU	Review docs/emails re Flores expert document production and privilege/work product	0.40	\$600.00	\$240.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg	Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	
	7/16/2020	BU	Emails to CH, R. Foss re status of Lacey, Ginder depositions and strategy re same	0.30	\$600.00	\$180.00							
	7/16/2020	BU	Review/comments re Ps' position statement on appointment of discovery master and circulate to team	1.10	\$600.00	\$660.00							
	7/16/2020	BU	Email to MJ, CH re defense counsel's complaint about quote in Ps' position statement on appointment of discovery master	0.30	\$600.00	\$180.00							
	7/17/2020	BU	Draft letter re class declarant document requests, authorizations for same, and disclosing intent to seek leave to amend to add new plaintiffs/class reps	1.40	\$600.00	\$840.00							
	7/17/2020	BU	Phone call with CH re strategy for class declarant document requests	0.30	\$600.00	\$180.00							
	7/17/2020	BU	Draft subpoena to PointClickCare, including agent for service of process and applicable dates when in use at Sunrise	2.50	\$600.00	\$1,500.00							
	7/17/2020	BU	Review/comment on opp to ex parte app to amend class cert briefing schedule	0.20	\$600.00	\$120.00							
	7/17/2020	BU	Review Aegis/Oakmont discovery for contention Rogs for use in Sunrise	0.90	\$600.00	\$540.00							
	7/17/2020	BU	Email communications with CH re review Aegis/Oakmont discovery for contention Rogs for use in Sunrise	0.40	\$600.00	\$240.00							
	7/17/2020	BU	Email correspondence with DM, TSG Reporting re Flores remote depo logistics	0.20	\$600.00	\$120.00			0.2	120			
	7/20/2020	BU	Draft PointClickCare subpoena and forward same to MJ, CH	1.00	\$600.00	\$600.00							
	7/20/2020	BU	Review draft assessment data M&C letter re questions for extraction	0.60	\$600.00	\$360.00							
	7/20/2020	BU	Email correspondence with DM, JT re Flores depo prep, including forwarding Flores docs produced	1.20	\$600.00	\$720.00							
	7/20/2020	BU	Email to defense re scheduling assessment M&C	0.30	\$600.00	\$180.00							
	7/20/2020	BU	Review draft M&C letter re RPD Set 6 responses and email to MJ re same	0.40	\$600.00	\$240.00							
	7/20/2020	BU	Email to defense re declarant depo schedule and production of docs	0.20	\$600.00	\$120.00							
	7/21/2020	BU	Email to MJ, CH re scheduling stip re declarant depositions	0.30	\$600.00	\$180.00							
	7/21/2020	BU	Finalize [proposed] 2d supplemental responses to Rogs 20-21, POS and email to CH, MJ re same	1.00	\$600.00	\$600.00							
	7/21/2020	BU	Review draft RFAs	1.50	\$600.00	\$900.00			0.5	300			
	7/21/2020	BU	Review/compare Aegis RFAs to draft Sunrise RFAs	0.20	\$600.00	\$120.00							
	7/21/2020	BU	Review/comment on assessment M&C letter and email to MJ re same	0.60	\$600.00	\$360.00							
	7/21/2020	BU	Conference call with MJ, JT, B. Peters re assessment M&C strategy	1.50	\$600.00	\$900.00							
	7/21/2020	BU	Email correspondence with CH, GW, MJ re scheduling stip	0.50	\$600.00	\$300.00							
	7/21/2020	BU	Draft supplemental memo ISO opp to MTC putative class member docs	1.50	\$600.00	\$900.00							
	7/21/2020	BU	Review draft/redline stip re class cert and depo scheduling	0.30	\$600.00	\$180.00							
	7/22/2020	BU	Review draft of supplemental brief on MTC assessment data and send comments to CH, MJ	0.50	\$600.00	\$300.00							
	7/22/2020	BU	Draft supplemental memo ISO opp to MTC putative class member docs	1.00	\$600.00	\$600.00							
	7/22/2020	BU	Email correspondence to MJ re review of PDF assessments previously produced to analyze Sunrise's M&C proposal	1.20	\$600.00	\$720.00			0.5	300			

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	7/22/2020	BU	Email correspondence with MY, JT re class cert materials for Flores depo prep	0.30	\$600.00									
	7/22/2020	BU	Follow up call re assessment M&C with CH, MJ	0.90	\$600.00									
	7/22/2020	BU	Email correspondence with JT re assessment vs service plan data requirements	0.20	\$600.00									
	7/22/2020	BU	Follow up call with defense counsel on M&C re assessment data (discovery meet and confer with Sunrise counsel)	0.80	\$600.00									
	7/22/2020	BU	Further edits to supplemental memo iso opp to mtc further production of putative class member docs	0.60	\$600.00									
	7/22/2020	BU	Draft BU declaration re supplemental memo iso opp to mtc further production of putative class member docs	0.40	\$600.00									
	7/22/2020	BU	Prep for assessment M&C with Peters, Damian, PCC	0.50	\$600.00				0.5	300				
	7/22/2020	BU	Assessment M&C with Peters, Damian, PCC, MJ, A. Allyn (discovery meet and confer with Sunrise counsel)	1.00	\$600.00									
	7/22/2020	BU	Review rough transcript of assessment M&C with Peters, Damian, PCC	0.50	\$600.00									
	7/23/2020	BU	Email correspondence with MJ re assessment data meet and confer and inclusion of move out dates in production of same	0.20	\$600.00									
	7/23/2020	BU	Email correspondence with MJ re basis for claims of privilege re putative class member docs	0.40	\$600.00									
	7/23/2020	BU	Further edits to supplemental memorandum in opposition to mtc putative class member docs and the BU declaration in support of same; file	2.00	\$600.00									\$1,200.00
	7/23/2020	BU	Email correspondence with JT re Flores depo prep	0.70	\$600.00									\$420.00
	7/23/2020	BU	Email correspondence with MY, R. Foss, R. Steyer re class declarant depo dates	0.30	\$600.00				0.3	180				
	7/23/2020	BU	Email to defense requiring new dates for class declarant depositions because resident files were not produced in advance	0.40	\$600.00									\$240.00
	7/23/2020	BU	Review Sunrise's supplemental brief in opp to mtc assessment data	1.00	\$600.00									\$600.00
	7/24/2020	BU	Review Damian declaration and compare to M&C transcript re the form of Sunrise's request to PCC for ability to produce assessment data	1.50	\$600.00				0.5	300				\$900.00
	7/24/2020	BU	Upload Sunrise's latest document production for upload to Relativity and forward same to MY, R. Foss	0.30	\$600.00				0.3	180				\$180.00
	7/24/2020	BU	Review Sunrise's latest document production of resident files in advance of class declarant depositions	3.50	\$600.00									\$2,100.00
	7/24/2020	BU	Targeted searches re how Sunrise defines ADLs, including mobility, re Flores depo	0.80	\$600.00									\$480.00
	7/24/2020	BU	review/comment on response email to defense seeking clarification re proposal to produce assessment data	0.30	\$600.00									\$180.00
	7/24/2020	BU	Review Order appointing discovery master	0.30	\$600.00									\$180.00
	7/27/2020	BU	Email to defense re new proposed dates for class declarant depositions	0.40	\$600.00									\$240.00
	7/27/2020	BU	Conference call with MY, R. Foss re class declarant depo prep strategy	1.00	\$600.00									\$600.00
	7/28/2020	BU	Letter to counsel demanding resident files per authorizations and document requests	0.60	\$600.00									\$360.00
	7/28/2020	BU	Prepare latest Sunrise document production for upload to Relativity and send for processing	0.30	\$600.00				0.3	180				\$180.00

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	7/28/2020	BU	Email correspondnce with L. Valdez re clerk's notice requesting filing of amended notice of motion for class certification with new hearing date	0.40	\$600.00	\$240.00			0.4	240				
	7/28/2020	BU	Email to R. Foss, Truong, MY, attaching L. Greenfield docs Ps' produced in discovery, in advance of depo prep call	0.60	\$600.00	\$360.00								
	7/28/2020	BU	Review Sunrise's latest production of resident files for class declarants in advance of depo prep sessions	5.00	\$600.00	\$3,000.00			2	1200				
	7/28/2020	KAS	Review amended notice of motion and motion for Class Cert	2.00	\$795.00	\$1,590.00								
	7/29/2020	BU	Depo prep conference call with L. Greenfield, among R. Foss, MY, MJ, Truong	1.80	\$600.00	\$1,080.00								
	7/29/2020	BU	Prepare requested litigation documents for Discovery Master Guilford, prepare link and send, per request	1.50	\$600.00	\$900.00			0.5	300				
	7/29/2020	BU	Draft letter responding to Sunrise's request Ps' withdraw Falkenberg as proposed new plaintiff and class rep due to arbitration	0.70	\$600.00	\$420.00							0.7	420
	7/29/2020	BU	Email summary of important points to go over with L. Greenfield in advance of her depo, based on today's initial prep session	0.60	\$600.00	\$360.00								
	7/29/2020	BU	Email correspondencw with CH re declaration ISO leave to amend to add new plaintiffs; brief background info on former potential plaintiff	0.20	\$600.00	\$120.00								
	7/29/2020	BU	Review Sunrise's latest production of documents (resident files of class declarants), in advance of depo prep sessions	2.40	\$600.00	\$1,440.00								
	7/29/2020	BU	Email correspondence with MY re Protective Order / 'attorney's eyes only' designation / and persons authorized to review	0.50	\$600.00	\$300.00								
	7/29/2020	BU	Team call among DM, MJ, CH re assessment data M&C / other discovery issues and strategy	1.60	\$600.00	\$960.00					0.2	120		
	7/30/2020	BU	Email to MJ re relationship with Protective Order and Sunrise's argument that it must redact any personal information from service plan data - in connection with MTC/M&C re same	0.50	\$600.00	\$300.00								
	7/30/2020	BU	Email to DM re assessment data fields that are required in order to run DES analysis, re M&C on production of assessment data	0.30	\$600.00	\$180.00								
	7/30/2020	BU	Telephonic meet and confer with A. Allyn, J. Gorman (for defense) and MJ/BU re assessment and service plan data production and Ps RPD Set 6 (discovery meet and confer with Sunrise counsel)	1.50	\$600.00	\$900.00								
	7/30/2020	BU	Email summary of today's telephonic M&C and circulate to MJ	0.50	\$600.00	\$300.00								
	7/30/2020	BU	Email to MY, R. Foss, MJ re dates defense selected for class declarant depositions	0.10	\$600.00	\$60.00			0.1	60				
	7/30/2020	BU	Incoporate MJ's edits into my notes of today's telephonic M&C and ciruclate to team	0.30	\$600.00	\$180.00			0.3	180				
	7/30/2020	BU	Review further edits to draft leave to amend letter	0.20	\$600.00	\$120.00								
	7/30/2020	BU	Review newly produced resident files for class declarant depo prep	2.00	\$600.00	\$1,200.00								
	7/31/2020	BU	Email to defense counsel confirming dates for class declarant depositions	0.20	\$600.00	\$120.00			0.2	120				
	7/31/2020	BU	Review newly produced resident files in advance of class declarant depo prep sessions	2.50	\$600.00	\$1,500.00								
	7/31/2020	BU	Finalize and send letter declining to withdraw motion for leave to amend as to Falkenberg	0.70	\$600.00	\$420.00							0.7	420

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	7/31/2020	BU	Email correspondence with MY re C. Romeo depo and depo prep schedule	0.20	\$600.00									
	7/31/2020	BU	Draft M&C letter responding to Sunrise's 7/30 letter re Ps' ESI requests and other outstanding RPDs and applicabiity of protective order	3.50	\$600.00									
	8/3/2020	BU	Email correspondence with MY re C. Romeo depo prep, including highlighting key sections of Residency Agreement to be familiar with	0.40	\$600.00									
	8/3/2020	BU	Upload Wicht-related resident file to Dropbox for acces by team	0.30	\$600.00				0.3	180				
	8/3/2020	BU	Email correspondence with defense counsel and Ps' team re class declarant depo logistics	0.20	\$600.00				0.2	120				
	8/3/2020	BU	Meet and confer letter responding to Sunrise's announcement of de facto discovery stay	3.00	\$600.00									\$1,800.00
	8/3/2020	BU	Depo prep conference call with MY, C. Romeo	1.80	\$600.00									\$1,080.00
	8/3/2020	BU	Email correspondence with CH, J. Gorman re production of Olivera Residency Agreement	0.20	\$600.00									\$120.00
	8/3/2020	BU	Search docs produced to date for Olivera residency agreement (re declarant C. Romeo)	0.60	\$600.00									\$360.00
	8/3/2020	BU	Email correspondence with R. Steyer re T. Wicht documents for depo prep	0.20	\$600.00									\$120.00
	8/3/2020	BU	Email correspondence with MJ re class declarant depo coverage	0.20	\$600.00				0.2	120				\$120.00
	8/3/2020	BU	Email to CH re status of class declarant depo prep	0.10	\$600.00									\$60.00
	8/4/2020	BU	Email to defense counsel re deposition notices and exhibits	0.20	\$600.00									\$120.00
	8/4/2020	BU	Circulate notices to team and relay exhibit process	0.10	\$600.00				0.1	60				\$60.00
	8/4/2020	BU	Phone call with TSG reporting re remote attendance logistics for Romeo depo and email to MJ re same	0.40	\$600.00				0.4	240				\$240.00
	8/4/2020	BU	Review newest document production	0.30	\$600.00									\$180.00
	8/4/2020	BU	Email correspondence and phone conversation with MY re limited purpose attorney rep agreement	0.30	\$600.00									\$180.00
	8/4/2020	BU	Follow up depo prep call with MY, C. Romeo - final reminders and big-picture points	1.00	\$600.00									\$600.00
	8/4/2020	BU	Review newly produced portion of Olivera (Romeo) resident file for depo prep session / depo	1.70	\$600.00									\$1,020.00
	8/4/2020	BU	Email correspondence with MY re same Olivera (Romeo) production	0.30	\$600.00									\$180.00
	8/5/2020	BU	Review new Olivera/Romeo emails for privilege and prepare for production and forward to MY for same/service	0.60	\$600.00									\$360.00
	8/5/2020	BU	Email summary of C. Romeo depo highlights, including points for review with remaining class declarant witnesses and circulate to team	0.50	\$600.00									\$300.00
	8/5/2020	BU	C. Romeo remote video deposition	5.10	\$600.00									\$3,060.00
	8/6/2020	BU	Depo prep call with R. Foss, L Greenfield	2.80	\$600.00									\$1,680.00
	8/6/2020	BU	Review and bates stamp additionally provided for production	0.20	\$600.00									\$120.00
	8/6/2020	BU	Review newest document productions containing class declarant-related resident files - re depo prep	0.80	\$600.00									\$480.00
	8/6/2020	BU	Email to MJ re Wicht documents	0.20	\$600.00									\$120.00
	8/6/2020	KAS	Email to GW re Sunrise Mediation	0.20	\$795.00									\$159.00
	8/7/2020	BU	Draft outline re omnibus motion to compel	4.00	\$600.00									\$2,400.00

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked	Fees	General Hrs	Fees						
	8/7/2020 BU	Email to J. Gorman producing additional Greenfield documents in advance of deposition and providing contact info for remote depo	0.20	\$600.00	\$120.00								
	8/7/2020 BU	Email to team re gaining access to RealPage task times for use in Sunrise	0.40	\$600.00	\$240.00								
	8/7/2020 BU	Review latest meet and confer letter re purported deficiencies with Ps' expert productions and email response to CH re same	0.30	\$600.00	\$180.00								
	8/10/2020 BU	Email correspondence with defense counsel re contact info for Wicht remote depo and existence of documents provided by Wicht	0.30	\$600.00	\$180.00								
	8/10/2020 BU	Email correspondence with SW, GK re DSS document productions on Relativity	0.40	\$600.00	\$240.00			0.4	240				
	8/10/2020 BU	Email correspondence with MJ re timing for M&C on Ps' motion for leave to amend to add new plaintiffs/class reps	0.20	\$600.00	\$120.00								
	8/11/2020 BU	Email correspondence with L. Valdez re local rule requirements for filing under seal	0.10	\$600.00	\$60.00			0.1	60				
	8/11/2020 BU	Remote depo of L. Greenfield	4.50	\$600.00	\$2,700.00								
	8/11/2020 BU	Draft email summary of highlights of Greenfield depo	0.40	\$600.00	\$240.00								
	8/11/2020 BU	Email and phone conversation with R. Foss re same and circulate to team	0.20	\$600.00	\$120.00								
	8/11/2020 BU	Draft email re scheduling M&C for P's motion for leave to amend and circulate to team for review/comment.	0.30	\$600.00	\$180.00								
	8/11/2020 BU	Email correspondence with R. Foss re status of Lacey/Ginder depositions	0.30	\$600.00	\$180.00								
	8/12/2020 BU	Telephonic M&C re Ps' (MJ, BU) leave to amend, with A. Allyn, J. Gorman for Sunrise (discovery meet and confer with Sunrise counsel)	0.30	\$600.00	\$180.00								
	8/12/2020 BU	Discussion with MJ re meet and confer on leave to amend	0.20	\$600.00	\$120.00								
	8/12/2020 BU	Review Arora and Roby declarations re current resident status of parents and email to GW re same	0.40	\$600.00	\$240.00								
	8/13/2020 BU	Email summary of M&C on Ps' motion for leave to amend and circulate to GW, CH, MJ	0.20	\$600.00	\$120.00								
	8/13/2020 BU	Email summary of highlights of T. Wicht deposition and key takeaways from 3 class declarant depositions	0.40	\$600.00	\$240.00								
	8/13/2020 BU	Conversation with MJ re Wicht depo and forward to team.	0.10	\$600.00	\$60.00								
	8/13/2020 BU	Remote depo of T. Wicht	5.00	\$600.00	\$3,000.00								
	8/13/2020 BU	Spot review of newest Sunrise document production	0.70	\$600.00	\$420.00								
	8/13/2020 BU	Email to CH, GW, MJ re key docs in newest production	0.30	\$600.00	\$180.00								
	8/14/2020 BU	Draft MTC outline, list of prioritized requests, relevant M&C correspondence and forward to CH for review/comment	8.80	\$600.00	\$5,280.00								
	8/15/2020 BU	Email correspondence with team re available depo dates for 2 additional class declarants (Ziehl, Lahman)	0.20	\$600.00	\$120.00			0.2	120				
	8/17/2020 BU	Draft BU declaration iso leave to amend to add new plaintiffs/class reps	8.70	\$600.00	\$5,220.00								
	8/18/2020 BU	Email correspondence with MY re class declarant Ziehl, Lahman depo dates / timing / status of doc productions	0.30	\$600.00	\$180.00								
	8/18/2020 BU	Draft email to J. Gorman re Ps' position re class declarant Ziehl, Lahman depo dates / timing / status of doc productions	0.20	\$600.00	\$120.00								
	8/18/2020 BU	Draft omnibus motion to compel (jt. statement)	3.50	\$600.00	\$2,100.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	8/18/2020	BU	Edits/redline to draft motion for leave to amend to add new plaintiffs/class reps	3.20	\$600.00	\$1,920.00								
	8/18/2020	BU	Email to L. Pettite re additional items to potentially produce for Dr. Kennedy in connection with exchange of expert materials	0.30	\$600.00	\$180.00								
	8/18/2020	BU	draft insert to meet and confer letter re Ps' expert productions, re additional Dr. Kennedy materials; email to DM re same	0.50	\$600.00	\$300.00								
	8/19/2020	BU	Draft objections to Ziehl, Lahman depostion subpoenas and circulate for review/comment	0.60	\$600.00	\$360.00								
	8/19/2020	BU	Draft omnibus motion to compel	4.90	\$600.00	\$2,940.00								
	8/19/2020	BU	Email correspondence with L. Pettite re Kennedy billing materials for supplemental production	0.20	\$600.00	\$120.00								
	8/19/2020	BU	Further revisions to BU declaration iso motion for leave to amend and recirculate for review/comment	0.50	\$600.00	\$300.00								
	8/19/2020	BU	Serve Ziehl, Lahman depo notice objections with cover email re Ziehl availability	0.40	\$600.00	\$240.00								
	8/19/2020	BU	Email correspondence with CH, MY re Ziehl, Lahman depo availability and schedule and email to A. Allyn re same	0.40	\$600.00	\$240.00								
	8/19/2020	BU	Bates label Kennedy invoice and forward same to DM	0.10	\$600.00	\$60.00								
	8/19/2020	BU	Email correspondence with DM re M&C letter, privilege log	0.40	\$600.00	\$240.00								
	8/20/2020	KAS	Phone call w/BU and MY re status of potential new plaintiffs as guardians ad litem, successor in interest, etc.	0.60	\$795.00	\$477.00								
	8/20/2020	BU	Email to defense counsel re Ms. Ziehl's unavailability for deposition	0.30	\$600.00	\$180.00								
	8/20/2020	BU	Review new plaintiff allegations in draft Third Amended Complaint and compare to each's class cert declaration	1.80	\$600.00	\$1,080.00								
	8/20/2020	BU	Draft Guardian ad Litem applications for Falkenberg, Arora	1.10	\$600.00	\$660.00							1.1	660
	8/20/2020	KAS	Email to MY re Heredia amended complaint	0.20	\$795.00	\$159.00								
	8/20/2020	KAS	Email to BU, KF, and DZ re Sunrise Guardian ad Litem	0.20	\$795.00	\$159.00								
	8/20/2020	BU	Finalize BU declaration iso motion for leave to amend	0.70	\$600.00	\$420.00								
	8/20/2020	BU	Telephone call with KAS, MY re status of potential new plaintiffs as guardians ad litem, successor in interest, etc. and email to SC, K. Fish re same	0.60	\$600.00	\$360.00							0.6	360
	8/20/2020	KAS	Email to BU re Sunrise Amended Complaint	0.20	\$795.00	\$159.00								
	8/20/2020	BU	Legal research re guardian ad litem (re Falkenberg, Arora)	2.00	\$600.00	\$1,200.00							2	\$1,200.00
	8/20/2020	BU	Draft declarations for Falkenberg, Arora re same	1.00	\$600.00	\$600.00							1	600
	8/20/2020	BU	Email correspondence with MY, KAS re draft Falkenberg, Arora declaration	0.20	\$600.00	\$120.00							0.2	120
	8/21/2020	BU	Finalize and circulate for review/comment the Falkenberg, Arora Guardian ad Litem applications and supporting declarations	0.50	\$600.00	\$300.00							0.5	300
	8/21/2020	KAS	Review notice of motion and motion to amend pretrial scheduling order	0.50	\$795.00	\$397.50								
	8/21/2020	BU	Work with L. Valdez to finalize and file the Falkenberg and Arora GAL applications and supporting declarations, including obtaining sig pages, ECF rules	2.50	\$600.00	\$1,500.00							2.5	1,500.00
	8/21/2020	BU	Draft email to defense re Ms. Ziehl's unavailability for deposition and circulate for review/comment	0.30	\$600.00	\$180.00								
	8/21/2020	BU	Spot review of newest document production of class declarant resident files (Lahman)	1.50	\$600.00	\$900.00								
	8/22/2020	BU	Spot review of newest document production of class declarant resident files (Lahman) and email to MY re same	3.00	\$600.00	\$1,800.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	8/24/2020	BU	Draft omnibus motion to compel	3.80	\$600.00	\$2,280.00								
	8/24/2020	KAS	Review petitions to appoint GALs	0.30	\$795.00	\$238.50							0.3	795
	8/24/2020	BU	Telephone call with CH, MY, MJ re Ziehl's unavailability for depo and proposed response to Sunrise	0.40	\$600.00	\$240.00								
	8/24/2020	BU	Email to A. Allyn re pending response re Ms. Ziehl's deposition availability and providing Ms. Lahman's contact info for remote depo	0.10	\$600.00	\$60.00								
	8/24/2020	BU	Work with L. Valdez to provide Court with Word version of [proposed] orders on Ps' class cert filing and leave to amend motion	0.70	\$600.00	\$420.00			0.7	420				
	8/24/2020	BU	Review correspondence re Sunrises' intent to move for judgment on the pleadings and potential responses to same	0.30	\$600.00	\$180.00								
	8/24/2020	BU	Review notes/case file for contacts with current Sunrise residents	0.70	\$600.00	\$420.00								
	8/25/2020	BU	Review Lahman resident file in preparation for today's phone prep conference in advance of depo	1.80	\$600.00	\$1,080.00								
	8/25/2020	BU	Email correspondence with MY re Lahman resident file	0.20	\$600.00	\$120.00								
	8/25/2020	BU	Telephone conference with MY, L. Lahman re depo prep	1.50	\$600.00	\$900.00								
	8/25/2020	BU	Telephonic meet and confer on Sunrise's motion for judgment on the pleadings	0.30	\$600.00	\$180.00								
	8/25/2020	KAS	Emails to CH re Sunrise - Current Resident Plaintiffs	0.20	\$795.00	\$159.00								
	8/25/2020	KAS	Fwd to BU and GK re Sunrise - Current Resident Plaintiffs	0.10	\$795.00	\$79.50								
	8/26/2020	BU	Draft omnibus motion to compel; circulate to team	8.20	\$600.00	\$4,920.00								
	8/26/2020	BU	Review Shiferaw (related case) declarations for info relevant to omnibus motion to compel	1.50	\$600.00	\$900.00								
	8/26/2020	BU	Email correspondence with MY, CH re Ziehl depo availability	0.40	\$600.00	\$240.00								
	8/26/2020	BU	Review newly produced documents re Lahman residence file	0.90	\$600.00	\$540.00								
	8/26/2020	BU	Email to MY attaching newly produced email to discuss with Ms. Lahman before deposition	0.20	\$600.00	\$120.00								
	8/27/2020	BU	Internet research re publicly available info on L. Lahman	1.00	\$600.00	\$600.00								
	8/27/2020	BU	Remote depo of L. Lahman	5.00	\$600.00	\$3,000.00								
	8/27/2020	BU	Draft email summary of highlights of Lahman deposition and forward to MY	0.40	\$600.00	\$240.00								
	8/27/2020	BU	Legal research re quashing deposition subpoena, re Ziehl depo and whether to withdraw class cert declaration and email to MY re same	0.60	\$600.00	\$360.00								
	8/28/2020	BU	Telephone call with KAS, MY, R. Foss re strategy for finding new plaintiff who is a current resident	0.50	\$600.00	\$300.00								
	8/28/2020	BU	Review index important facts gleaned from Shiferaw (related case) declarations for use in omnibus motion to compel	5.80	\$600.00	\$3,480.00			0.8	480				
	8/28/2020	BU	Phone call w/BU, MY, and R. Foss re strategy for finding new plaintiff who is a current resident	0.50	\$795.00	\$397.50								
	8/28/2020	KAS	Email to CH re Sunrise - Injunctive Relief Standing Issue	0.40	\$795.00	\$318.00								
	8/28/2020	KAS	Emails to BU/S. Dharap/MY/R. Fross/GK re Sunrise Current Residents	0.30	\$795.00	\$238.50								
	8/28/2020	BU	Email correspondence to defense counsel agreeing to withdraw Ziehl class declaration	0.20	\$600.00	\$120.00								
	8/31/2020	BU	Targeted Relativity searches re evidence of average length of resident stay at Sunrise	1.60	\$600.00	\$960.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions		CC Confs		Falkenberg		Travel	
							General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	8/31/2020	BU	Email correspondence with S. Dharap, Truoung, KAS re scheduling calls with current resident potential plaintiffs and review/forward class cert declarations re same	0.40	\$600.00	\$240.00								
	8/31/2020	KAS	Email w/BU, S. Dharap, and Truoung re scheduling calls with current resident	0.40	\$795.00	\$318.00								
	8/31/2020	BU	Revised draft of omnibus motion to compel	6.80	\$600.00	\$4,080.00								
	8/31/2020	BU	Review emails re strategy on responding to Sunrise's petition to compel Falkenberg arbitration	0.30	\$600.00	\$180.00							0.3	180
	9/1/2020	BU	Review Shiferaw (related case) declarations and excerpt pertinent portions for omnibus motion to compel and class cert reply	4.50	\$600.00	\$2,700.00								
	9/1/2020	BU	Further edits / revised draft of omnibus motion to compel	3.00	\$600.00	\$1,800.00								
	9/1/2020	KAS	Review notice from the Court continuing class cert hearing	0.10	\$795.00	\$79.50			0.1	79.5				
	9/1/2020	KAS	Review Motion for JOP	1.00	\$795.00	\$795.00								
	9/2/2020	BU	Gather and forward potential new class reps' declarations submitted iso class certification to KAS in advance of call with reps re possibly serving as class rep going forward (arb vs non-arb and leave to amend)	0.70	\$600.00	\$420.00								
	9/2/2020	BU	Determine date H. Ganz moved out of Sunrise, per GW request	0.30	\$600.00	\$180.00								
	9/2/2020	BU	Further edits/revisions to draft omnibus motion to compel	6.10	\$600.00	\$3,660.00								
	9/2/2020	KAS	Email to BU re Sunrise rep calls	0.40	\$795.00	\$318.00								
	9/2/2020	KAS	Review MTS expert declarations ISO class cert motion, opposition to class cert motion	1.50	\$795.00	\$1,192.50								
	9/3/2020	BU	Review Sunrise's class cert opposition and related papers	5.00	\$600.00	\$3,000.00								
	9/3/2020	BU	Email to defense counsel requesting unredacted, electronic copies of Sunrise's class cert opposition filing	0.20	\$600.00	\$120.00								
	9/3/2020	BU	Review case file to determine date when discovery stay was lifted, per GW request re leave to amend	0.40	\$600.00	\$240.00								
	9/3/2020	BU	Determine date when Helen Ganz entered Sunrise facility, per GW request re leave to amend/class cert reply	0.20	\$600.00	\$120.00								
	9/4/2020	BU	Email correspondence with R. Foss re attorney rep agreement for possible use in connection with class cert declarant depositions and forward draft of same	0.50	\$600.00	\$300.00								
	9/4/2020	BU	Team strategy call re reply iso class cert, tasks to be accomplished for reply including outstanding discovery	1.00	\$600.00	\$600.00								
	9/4/2020	BU	Email correspondence with MJ re outstanding discovery items and priority list for next week's meet and confer	0.40	\$600.00	\$240.00								
	9/4/2020	BU	Further edits to draft MTC further production of documents and circulate to team for review/comment	5.30	\$600.00	\$3,180.00								
	9/4/2020	BU	Draft notice of withdrawal of Ziehl Declaration ISO class cert and circulate to team for review/comment	1.70	\$600.00	\$1,020.00								
	9/4/2020	BU	Review email correspondence with DSS re timeliness of compliance with subpoenas for Sunrise facility records	0.20	\$600.00	\$120.00								
	9/4/2020	BU	Email correspondence with defense re withdrawal of Ziehl declaration and emails with CH re same	0.20	\$600.00	\$120.00								
	9/4/2020	KAS	Email to CH/R. Foss re Team call at 1pm	0.20	\$795.00	\$159.00			0.2	159				
	9/4/2020	BU	Email correspondence with CH re obtaining task time studies in Aegis/Oakmont cases	0.50	\$600.00	\$300.00								
	9/6/2020	BU	Email correspondence re impact of Brown v DirectTV on class cert and arbitration issue and relevance to discovery	0.40	\$600.00	\$240.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	9/7/2020	BU	Draft memo for this week's discovery meet and confer of outstanding items and status and forward same to MJ	3.00	\$600.00	\$1,800.00								
	9/8/2020	KAS	Review notice of withdrawal of declaration	0.20	\$795.00	\$159.00								
	9/8/2020	BU	Gather and forward Judge Early's procedure for motions to compel and hearings to MJ	0.40	\$600.00	\$240.00								
	9/8/2020	BU	Phone call with MJ re strategy/proposal for conference with Discovery Master	0.80	\$600.00	\$480.00								
	9/8/2020	BU	Legal research re opp to MTS Ganz declaration - sham declarations; newly remembered facts	6.50	\$600.00	\$3,900.00								
	9/8/2020	BU	Cause to be filed notice of withdrawal of Ziehl declaration	0.40	\$600.00	\$240.00								
	9/8/2020	BU	Edit/update discovery meet and confer memo to include Sunrise's position on arb-related requests contained in Ps' Set 6	0.60	\$600.00	\$360.00								
	9/9/2020	BU	Review team emails re strategy / objectives for Discovery Master conference tomorrow	0.50	\$600.00	\$300.00								
	9/9/2020	BU	Draft opp to MTS Ganz declaration	7.00	\$600.00	\$4,200.00								
	9/10/2020	BU	Telephonic conference with discovery master Guilford. MJ and BU for Ps, A. Allyn, M. Maryott for Sunrise	0.90	\$600.00	\$540.00								
	9/10/2020	KAS	Fwd to CH/MJ/BU re Sunrise docs received in mail	0.20	\$795.00	\$159.00								
	9/10/2020	BU	Draft and circulate notes of telephonic conference with Discovery Master Guilford	0.50	\$600.00	\$300.00								
	9/10/2020	BU	Email correspondence with R. Foss re 'happy camper' declarations / depositions and strategy re same for Reply	0.20	\$600.00	\$120.00								
	9/10/2020	BU	Finalize draft of opp to MTS Ganz declaration and forward to team for review/comment	5.10	\$600.00	\$3,060.00								
	9/10/2020	KAS	Email to GK re Sunrise class action (potential individual claim for class declarant)	0.20	\$795.00	\$159.00								
	9/11/2020	BU	Draft insert for supplemental (update) brief on outstanding motions for Judge Guilford, re Sunrise's MTC absent class member docs	3.40	\$600.00	\$2,040.00								
	9/11/2020	BU	Email to CH including language for draft of supplemental brief iso mtc assessment / service plan data	0.50	\$600.00	\$300.00								
	9/11/2020	BU	Email to MY re documents received from putative class members being withheld on the basis of attorney work-product and strategy re Sunrise's mtc re same	0.30	\$600.00	\$180.00								
	9/11/2020	BU	Email correspondence with R. Steyer re documents received from putative class members being withheld on the basis of attorney work-product and strategy re Sunrise's mtc re same	0.30	\$600.00	\$180.00								
	9/11/2020	BU	Team call re discovery - status of meet and confers and corresponding motions to compel (especially assessment/service plan data); conference with Discovery Master Guilford, related Falkenberg action	1.00	\$600.00	\$600.00				0.2	120			
	9/11/2020	BU	Review complaint/papers filed in related Falkenberg action seeking to compel arbitration	0.70	\$600.00	\$420.00							0.7	420
	9/11/2020	BU	Email to CH excerpting portion of M&C notes re Sunrise's position on production of service plan data, re supplemental brief iso mtc re same	0.30	\$600.00	\$180.00								
	9/14/2020	BU	Draft supplemental (update) brief on outstanding motions for Judge Guilford, re assessment and service plan data / absent class member docs	2.50	\$600.00	\$1,500.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees	
					Worked	Fees	General	Fees							
							Hrs								
	9/14/2020	BU	Email to CH, MJ re general contents of absent class member docs being withheld as attorney work-product	0.30	\$600.00										
	9/14/2020	BU	Draft renewed and amended application to file under seal per Dkt 215	1.80	\$600.00				0.3	180					
	9/14/2020	BU	Email correspondence with CH re renewed and amended application to file under seal	0.20	\$600.00				0.2	120					
	9/14/2020	BU	Further redlined edits to draft supplemental (update) brief re assessment data / absent class member docs and forward same to MJ	0.70	\$600.00										
	9/14/2020	BU	Download and begin review of newest document productions from Sunrise	2.00	\$600.00										
	9/14/2020	KAS	Email to GK re Sunrise - Attorney Representation Agreement Lesley Greenfield.pdf	0.20	\$795.00										
	9/15/2020	BU	Draft MTC re budget-related ESI; circulate to team for review and comment	7.20	\$600.00										
	9/15/2020	BU	Forward renewed application to file under seal and related papers to L. Valdez for proofing and filing	0.50	\$600.00				0.5	300					
	9/15/2020	BU	Review expert-related documents produced yesterday and forward important docs to DM, CH	1.00	\$600.00										
	9/15/2020	BU	Forward new document productions to R. Bonner for upload to Relativity	0.40	\$600.00				0.4	240					
	9/15/2020	BU	Email to MY and RF re absent class member docs	0.30	\$600.00										
	9/15/2020	BU	Email to team re mtc re absent class member docs	0.10	\$600.00										
	9/16/2020	BU	Further edits to draft supplemental (updated) brief for Judge Guilford re assessment data and absent class member docs	0.60	\$600.00										
	9/16/2020	BU	Download and forward Sunrise experts' document productions to DM, JT	0.30	\$600.00				0.3	180					
	9/16/2020	BU	Draft RPD (Set 8) re resident files and related documents concerning the residents who are the subjects of Sunrise's happy-camper declarations	0.90	\$600.00										
	9/16/2020	BU	Draft discovery letter requesting documents received from same per RPD No. 7 (Set 1) and forward to team for review / comment	0.40	\$600.00										
	9/16/2020	BU	Review newest document productions from Sunrise (SUN035, SUN036, experts)	2.00	\$600.00										
	9/16/2020	BU	Team call re status of discovery, class cert reply, assignments	1.00	\$600.00						0.1	60			
	9/16/2020	BU	Email to defense counsel requesting clarification for newly produced spreadsheets bearing Bates numbers -102675 and -102676	0.20	\$600.00										
	9/16/2020	BU	Email correspondence with L. Valdez re timing of response on petition filed in related Falkenberg action	0.20	\$600.00								0.2	120	
	9/17/2020	BU	Fact research for class cert reply insert re named plaintiffs' reliance on Sunrise's representations and facts supporting typicality	5.10	\$600.00										
	9/18/2020	BU	Phone call with CH re class rep reliance issues to address in class cert Reply	0.50	\$600.00										
	9/18/2020	BU	Serve RPD Set 8 on Sunrise and transmittal email re same	0.40	\$600.00				0.2	120					
	9/18/2020	BU	Draft class cert reply insert re named plaintiffs' reliance on Sunrise's representations and facts supporting typicality and forward same to CH	4.00	\$600.00										

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs	Fees						
		"key provisions" project comparing different iterations of the Sunrise Residency Agreement, for class cert reply	2.00	\$600.00	\$1,200.00									
9/18/2020	BU	Work with L. Valdez to file class cert papers under seal pursuant to Court's 9/16 Order	0.40	\$600.00	\$240.00				0.4	240				
9/21/2020	BU	Review Discovery Master Guilford's supplemental questions and MJ's proposed reply, re pending motions to compel	0.60	\$600.00	\$360.00									
9/21/2020	BU	Review Sunrise's explanation of contents of newly produced spreadsheets and forward same to team	0.20	\$600.00	\$120.00									
9/21/2020	BU	"key provisions" project comparing different iterations of the Sunrise Residency Agreement, for class cert Reply	2.00	\$600.00	\$1,200.00									
9/22/2020	KAS	Review of email from BU re Heredia motion to compel arbitration, in order to address argument in motion for leave to amend the complaint	0.30	\$795.00	\$238.50								0.3	238.5
9/22/2020	BU	Forward exemplar assessment data to CH, DM	0.10	\$600.00	\$60.00				0.1	60				
9/22/2020	BU	Email to KAS re Heredia motion to compel arbitration, in order to address argument in motion for leave to amend the complaint	0.50	\$600.00	\$300.00								0.5	300
9/22/2020	BU	"key provisions" project comparing different iterations of the Sunrise Residency Agreement, for class cert reply	2.00	\$600.00	\$1,200.00									
9/23/2020	BU	Upload Sunrise-related DSS documents and forward R. Bonner link re same for upload to Relativity	0.50	\$600.00	\$300.00				0.5	300				
9/23/2020	BU	Email to defense counsel requesting available deposition dates for T. Berry and experts who provided declarations in support of class cert opp	0.20	\$600.00	\$120.00									
9/23/2020	BU	Team call re class cert Reply, depositions, discovery motions	0.80	\$600.00	\$480.00						0.1	60		
9/23/2020	BU	Index Sunrise-related docs received from DSS via subpoena and email to MY re same	2.00	\$600.00	\$1,200.00				0.5	300				
9/24/2020	BU	Review M&C letter from defense re Ps' expert productions	0.40	\$600.00	\$240.00									
9/24/2020	BU	Email correspondence to MY, RF requesting written communications with three new proposed class reps (Arora, Falkenberg, Roby)	0.30	\$600.00	\$180.00								0.3	180
9/24/2020	BU	Email correspondence with T. Needham re Musoke deposition logistics	0.20	\$600.00	\$120.00									
9/24/2020	BU	Phone call to RealPage customer support inquiring about software purchase and email to CH re same	0.50	\$600.00	\$300.00									
9/24/2020	BU	Review Arns Firm's communications with Lesley Greenfield, re pending mtc absent class member docs and forward same to MJ	1.00	\$600.00	\$600.00									
9/24/2020	BU	Phone call with MJ re Discovery Master Guilford's 9/23 email regarding outstanding motions	0.50	\$600.00	\$300.00									
9/24/2020	BU	Draft "omnibus" mtc further production of documents	4.00	\$600.00	\$2,400.00									
9/25/2020	KAS	Fwd to CH and BU re TSG - Sunrise Invoices	0.30	\$795.00	\$238.50				0.3	238.5				
9/25/2020	BU	Draft "omnibus" mtc further production of documents	2.00	\$600.00	\$1,200.00									
9/25/2020	BU	Review class declarant T. Wicht email correspondence	0.20	\$600.00	\$120.00									
9/25/2020	BU	Forward T. Wicht email correspondence to MJ	0.10	\$600.00	\$60.00				0.1	60				
9/25/2020	BU	Email correspondence with R. Foss, R. Bonner re access to Relativity for Arns Firm	0.30	\$600.00	\$180.00				0.3	180				
9/25/2020	BU	Upload Beverly Hills, Westlake Village, and Claremont DSS files and send link to MY for download	0.30	\$600.00	\$180.00				0.3	180				
9/25/2020	BU	Draft "omnibus" mtc further production of documents	6.50	\$600.00	\$3,900.00									

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	9/25/2020	BU	Email correspondence with A. Allyn re depo scheduling for Sunrise experts	0.20	\$600.00	\$120.00								
	9/28/2020	BU	Draft BU declaration ISO "omnibus" mtc	5.70	\$600.00	\$3,420.00								
	9/28/2020	BU	Further edits to draft brief including statutory cite for training regulations and revised introduction	0.80	\$600.00	\$480.00								
	9/28/2020	BU	Telephonic M&C with MJ, A. Allyn, J. Gorman re status of production of assessment and service plan data (and Discovery Master Guilford's email re pending motions to compel) (discovery meet and confer with Sunrise counsel)	0.80	\$600.00	\$480.00								
	9/28/2020	BU	Telephone call with MJ re M&C with A. Allyn, J. Gorman - debrief, analysis	0.30	\$600.00	\$180.00								
	9/28/2020	BU	Team call re status of discovery, class cert reply, assignments	1.00	\$600.00	\$600.00					0.2	120		
	9/28/2020	BU	Email to A. Allyn re available deposition dates for Sunrise's class cert experts	0.20	\$600.00	\$120.00								
	9/29/2020	BU	Forward information to MJ re location of service plan data produced by Sunrise	0.30	\$600.00	\$180.00			0.3	180				
	9/29/2020	BU	Forward information to MJ re location of service plan data produced by Sunrise	0.80	\$600.00	\$480.00			0.8	480				
	9/29/2020	BU	Email correspondence with A. Allyn and Ps' team re available dates/scheduling of Sunrise's experts' depositions	0.30	\$600.00	\$180.00								
	9/29/2020	BU	Email commens to draft email to A. Allyn and J. Gorman re previous day's meet and confer conference re pending motions to compel	0.40	\$600.00	\$240.00								
	9/29/2020	BU	Review further correspondence in response from defense and final, joint version to be sent to Discovery Master Guilford	0.60	\$600.00	\$360.00								
	9/29/2020	BU	Discussion with GW re Reply iso leave to amend and factual content of supporting declarations	0.30	\$600.00	\$180.00								
	9/30/2020	BU	Draft depo notices/subpoenas for Berry, Musoke, Walker	1.50	\$600.00	\$900.00								
	9/30/2020	BU	Forward same to CH for review/comment and serve	0.20	\$600.00	\$120.00			0.2	120				
	9/30/2020	BU	Email correspondence with A. Allyn and Ps' team re available dates/scheduling of Sunrise's experts' depositions	0.50	\$600.00	\$300.00								
	9/30/2020	BU	Gather supporting information for Reply iso leave to amend to add new proposed class reps and emails to MJ, GW re/attaching same	2.50	\$600.00	\$1,500.00								
	9/30/2020	BU	Email to CH/team re status of efforts to purchase RealPage software	0.40	\$600.00	\$240.00								
	10/1/2020	BU	Review team emails re strategy for seeking extension on class cert deadlines and circulate comments re same	0.50	\$600.00	\$300.00								
	10/1/2020	BU	Email correspondence with DM re Sunrise's production of its experts' materials including for Crandall, Ward	0.80	\$600.00	\$480.00								
	10/1/2020	BU	Email and phone call with CH re Sunrise's production of expert materials and draft letter re 30(b)(6) depo	0.40	\$600.00	\$240.00								
	10/1/2020	BU	Phone call / emails with GW re contents of supporting declarations for Reply iso leave to amend	0.60	\$600.00	\$360.00								
	10/1/2020	BU	Email correspondence with MY re contents of supporting declarations for Reply iso leave to amend	0.20	\$600.00	\$120.00								
	10/1/2020	BU	Draft document requests to accompany subpoenas to Sunrise's expert Crandall	2.00	\$600.00	\$1,200.00								
	10/1/2020	BU	Draft M&C letter re outstanding deficiencies in Sunrise's staffing data productions to date	1.90	\$600.00	\$1,140.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg	Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	
	10/1/2020	BU	Email correspondence with team re same and revisions to accompanying spreadsheet from DM	1.10	\$600.00	\$660.00							
	10/2/2020	KAS	Email to BU re staffing data	0.20	\$795.00	\$159.00							
	10/2/2020	BU	Further edits to M&C letter re discrepancies raised by production of new staffing data	0.40	\$600.00	\$240.00							
	10/2/2020	BU	Email to MJ re M&C letter re new staffing data and expert document requests	0.30	\$600.00	\$180.00							
	10/2/2020	BU	Draft document requests to accompany subpoenas to Sunrise's experts Ward, Musoke, Walker	2.50	\$600.00	\$1,500.00							
	10/2/2020	BU	Finalize M&C letter re discrepancies raised by production of new staffing data and accompanying spreadsheet supporting same and serve on defense counsel	0.70	\$600.00	\$420.00							
	10/2/2020	BU	Review revisions/edits to subpoena document requests	1.20	\$600.00	\$720.00							
	10/2/2020	BU	Email correspondence to defense counsel requesting available deposition dates for Jason Malone and Gayle Kelly	0.20	\$600.00	\$120.00							
	10/2/2020	BU	Further edits to CH comments on draft MTC further production of documents	2.00	\$600.00	\$1,200.00							
	10/3/2020	BU	Email correspondence with T. Needham re Musoke deposition document production	0.50	\$600.00	\$300.00							
	10/4/2020	BU	Email response to MJ comments on draft MTC further production of documents	0.30	\$600.00	\$180.00							
	10/5/2020	BU	Pull discovery docs evidencing Sunrise pressure to meet financial targets and forward same to DM	0.40	\$600.00	\$240.00							
	10/5/2020	BU	email to T. Needham re important points to cover with Musoke at deposition	0.70	\$600.00	\$420.00							
	10/5/2020	BU	Email correspondence with team re final version of mtc further discovery (budget-related ESI; task time studies; CLM; Lacey, Ginder depositions; electronic assignment/staffing sheets; unredacted Shiferaw papers)	1.00	\$600.00	\$600.00							
	10/5/2020	BU	Search for / compile all census data produced by Sunrise to date and forward same to DM	1.50	\$600.00	\$900.00							
	10/5/2020	BU	Finalize draft MTC further production of documents and supporting BU declaration	6.50	\$600.00	\$3,900.00							
	10/6/2020	BU	Review Discovery Master Guilford's Report and Recommendation on MTC service plan data and absent class member docs	0.50	\$600.00	\$300.00							
	10/6/2020	BU	Draft BU declaration iso leave to amend with facts demonstrating diligence in seeking new plaintiffs	2.20	\$600.00	\$1,320.00							
	10/6/2020	BU	Email correspondence with GW re draft BU declaration	0.30	\$600.00	\$180.00							
	10/6/2020	BU	Hearing with Discovery Master Guilford on mtc service plan data and absent class member docs	1.00	\$600.00	\$600.00							
	10/6/2020	BU	Email summary of discovery hearing; email correspondence with MJ re same and forward to team	0.50	\$600.00	\$300.00							
	10/6/2020	BU	Search for documentary / testimonial evidence of frequency with which target hours are communicated to individual facilities; percentage of residents with dementia/Alzheimer's	3.20	\$600.00	\$1,920.00							
	10/6/2020	BU	Email correspondence with DM, CH re evidence of frequency with which target hours are communicated to individual facilities; percentage of residents with dementia/Alzheimer's	0.30	\$600.00	\$180.00							
	10/7/2020	KAS	Fwd email to GK re Rita Guzzetta/Sunrise	0.20	\$795.00	\$159.00			0.2	159			

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	10/7/2020	BU	Email correspondence with MY re declarations supporting Reply iso leave to amend and contents of Yarnall declaration re same	0.50	\$600.00	\$300.00								
	10/7/2020	BU	Email to DM confirming production of list task time literature relied upon by Dr. Flores to Sunrise (P009930-P09931)	0.30	\$600.00	\$180.00								
	10/7/2020	BU	Draft BU declaration iso leave to amend	2.00	\$600.00	\$1,200.00								
	10/7/2020	BU	Edits to GW's "diligence" outline and forward same to GW	0.50	\$600.00	\$300.00								
	10/7/2020	BU	Email to TSG Reporting setting schedule for upcoming depositions of Sunrise experts/witnesses	0.30	\$600.00	\$180.00			0.3	180				
	10/7/2020	BU	Further edits / additions to Reply iso leave to amend re typicality and adequacy of Fearn and Ganz	3.10	\$600.00	\$1,860.00								
	10/7/2020	BU	Further edits to GW "diligence" outline	0.40	\$600.00	\$240.00								
	10/8/2020	KAS	Email to CH re Sunrise Research	0.20	\$795.00	\$159.00			0.2	159				
	10/8/2020	BU	Email correspondence with A. Allyn re scheduling M&C call re Ps' omnibus mtc	0.30	\$600.00	\$180.00								
	10/8/2020	BU	Email / phone call with GW re Reply iso leave to amend and supporting BU declaration	0.80	\$600.00	\$480.00								
	10/8/2020	BU	Further edits and forward same to GW with draft of KAS declaration	3.00	\$600.00	\$1,800.00								
	10/8/2020	BU	Email / phone call with KAS re facts relating to Reply iso motion for leave to amend	0.20	\$600.00	\$120.00								
	10/8/2020	BU	Further edits to Reply iso motion for leave to amend same and supporting declarations	0.80	\$600.00	\$480.00								
	10/8/2020	BU	Email correspondence with R. Bonner re status of document production uploads to Relativity	0.30	\$600.00	\$180.00								
	10/8/2020	BU	Email correspondence to defense counsel re timing of production responsive to Ward subpoena in advance of deposition	0.30	\$600.00	\$180.00								
	10/8/2020	BU	Draft Yarnall declaration iso motion for leave to amend and forward same to MY	1.00	\$600.00	\$600.00								
	10/8/2020	BU	Review email correspondence re stipulation to extend class cert deadlines	0.30	\$600.00	\$180.00								
	10/8/2020	BU	Review DM letter re proposed remote deposition protocol	0.20	\$600.00	\$120.00								
	10/8/2020	KAS	Email/call w/BU re facts relating to Reply in motion to leave to amend	1.00	\$795.00	\$795.00								
	10/8/2020	BU	Review DM analysis of Sunrise's actual vs target hours	0.40	\$600.00	\$240.00								
	10/9/2020	BU	Phone call with CH and witness re Watermark task time document	1.00	\$600.00	\$600.00								
	10/9/2020	BU	Pre-M&C call with MJ re overview, strategy	0.40	\$600.00	\$240.00								
	10/9/2020	BU	Telephonic M&C with MJ, A. Allyn, J. Gorman re Ps' omnibus motion to compel (discovery meet and confer with Sunrise counsel)	0.50	\$600.00	\$300.00								
	10/9/2020	BU	Final edits to Reply iso motion for leave to amend	0.50	\$600.00	\$300.00								
	10/9/2020	BU	Compile notes of telephonic M&C re Ps' omnibus mtc and forward same to MJ for review/comment	0.40	\$600.00	\$240.00								
	10/9/2020	BU	Spot check new Ward, Crandall document productions	1.20	\$600.00	\$720.00								
	10/9/2020	BU	Review MY email and related correspondence re putative class member contacts	0.80	\$600.00	\$480.00								
	10/9/2020	BU	Email correspondence with defense counsel re rescheduling Berry deposition	0.20	\$600.00	\$120.00			0.2	120				
	10/9/2020	KAS	Email to CH re Sunrise - Berry Depo Prep	0.20	\$795.00	\$159.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
		Review responses and objections to Ward subpoena and forward same to JT	0.40	\$600.00		\$240.00								
10/10/2020	BU	Review summary notes of phone call with witness re other ALF task times	0.20	\$600.00		\$120.00								
10/10/2020	BU	Review CH, DM emails to KAS re suggested questions for confidential contact re staffing discretion	0.50	\$600.00		\$300.00								
10/10/2020	KAS	Email w/BU re suggested questions for confidential contact re staffing discretion	0.50	\$795.00		\$397.50								
10/11/2020	KAS	Call TP	0.20	\$795.00		\$159.00			0.2	159				
10/12/2020	KAS	Email to CH/DM re Sunrise answers to questions	0.20	\$795.00		\$159.00								
10/12/2020	BU	Call with CH, MJ re discovery plan following 10/9 M&C and 10/12 A. Allyn email	1.00	\$600.00		\$600.00								
10/12/2020	BU	Email to defense counsel re docs missing from Musoke production	0.30	\$600.00		\$180.00								
10/12/2020	BU	Draft Declaration of Elise Ganz in support of Ps' motion for class certification and forward same to GW, MJ for comment	6.50	\$600.00		\$3,900.00								
10/12/2020	KAS	Team correspondence re communication w/Confidential source re staffing discretion	0.50	\$795.00		\$397.50								
10/12/2020	BU	telephone call with J. Balette re deposition protocol and forward Ward subpoena/depo notice	0.50	\$600.00		\$300.00			0.5	300				
10/12/2020	BU	Email to team re Ward's reliance on executive director tenure information re discretion argument	0.50	\$600.00		\$300.00								
10/12/2020	BU	Review defense counsel's M&C correspondence / proposal following 10/9 M&C	0.50	\$600.00		\$300.00								
10/12/2020	BU	Review team correspondence re KAS communication with confidential source re staffing discretion	0.50	\$600.00		\$300.00								
10/12/2020	KAS	Email to CH re Sunrise - information sources	0.30	\$795.00		\$238.50								
10/12/2020	BU	Review objections / responses to Musoke subpoena	0.40	\$600.00		\$240.00								
10/12/2020	BU	Further edits to draft brief iso Ps' omnibus mtc	4.00	\$600.00		\$2,400.00								
10/13/2020	KAS	Fwd email to GK re Guzzetta/Sunrise	0.20	\$795.00		\$159.00			0.2	159				
10/13/2020	BU	Email to defense counsel following up on 10/2 letter requesting M&C on discrepancies in actual/target hours spreadsheet	0.20	\$600.00		\$120.00								
10/13/2020	BU	Further edits to draft brief iso Ps' omnibus mtc	4.00	\$600.00		\$2,400.00								
10/13/2020	BU	Team emails re SUN0096632-33	0.30	\$600.00		\$180.00								
10/13/2020	BU	Email to defense counsel requesting corrected copy of SUN0096632-33	0.10	\$600.00		\$60.00								
10/13/2020	BU	Review letter re remote deposition protocol re Musoke depo	0.20	\$600.00		\$120.00								
10/13/2020	BU	Email response to A. Allyn re discovery plan and response to Sunrise's proposal re same and forward to team for review / comment	1.90	\$600.00		\$1,140.00								
10/14/2020	KAS	Fwd email to GK re background for potential case	0.20	\$795.00		\$159.00			0.2	159				
10/14/2020	BU	Further edits to draft brief iso Ps' omnibus mtc	1.90	\$600.00		\$1,140.00								
10/14/2020	BU	Email correspondence with J. Balette re instructions on direct and circumstantial evidence in 9th Circuit re Ward deposition	0.60	\$600.00		\$360.00			0.6	360				
10/14/2020	BU	Search for all contract labor data produced to date and emails with CH, DM re same	1.00	\$600.00		\$600.00								
10/14/2020	BU	Email to defense counsel requesting available deposition dates for J. Malone and G. Kelly	0.20	\$600.00		\$120.00			0.2	120				

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	10/14/2020	BU	Key provisions' chart project - review newly identified residency agreements and update chart accordingly and emails with CH re same	3.00	\$600.00	\$1,800.00								
	10/14/2020	BU	Circulate corrected SUN0096632-33 and send to R. Bonner for replacement on Relativity	0.20	\$600.00	\$120.00			0.2	120				
	10/14/2020	BU	Review Discovery Master Guilford's final Report and Recommendation on MTC service plan data and absent class member docs	0.50	\$600.00	\$300.00								
	10/15/2020	BU	Review Sunrise's objections / responses to Crandall subpoena	0.20	\$600.00	\$120.00								
	10/15/2020	BU	Spot review and forward Crandall doc production to DM, JT and forward to R. Bonner for upload to Relativity	0.40	\$600.00	\$240.00			0.4	240				
	10/15/2020	BU	Further edits to draft brief iso Ps' omnibus mtc	7.00	\$600.00	\$4,200.00								
	10/16/2020	BU	Review DM shortfall analysis spreadsheet	0.50	\$600.00	\$300.00								
	10/16/2020	BU	Further edits to draft brief iso Ps' omnibus mtc, supporting BU declaration and exhibits	5.80	\$600.00	\$3,480.00								
	10/16/2020	BU	Email to DM, JT re communications with RealPage and pertinent software modules	0.30	\$600.00	\$180.00								
	10/16/2020	BU	Emails with CH re each party's obligations for costs incurred in connection with their experts' depositions and email to A. Allyn re same	0.50	\$600.00	\$300.00								
	10/16/2020	BU	Review M&C letter from A. Allyn re actual/target hours discrepancies and forward same to DM	0.50	\$600.00	\$300.00								
	10/17/2020	BU	Email to DM re Musoke declaration cites for proposition there are different ADL times in SNF vs RCFE	0.70	\$600.00	\$420.00								
	10/19/2020	BU	Further edits to BU declaration iso Ps' omnibus mtc and compile exhibits	1.90	\$600.00	\$1,140.00								
	10/19/2020	BU	Draft papers for filing under seal and prepare redactions	5.10	\$600.00	\$3,060.00			2	1200				
	10/19/2020	BU	Review summary of Musoke depo	0.50	\$600.00	\$300.00								
	10/19/2020	BU	Review Crandall document production for invoices for work done in Heredia	0.50	\$600.00	\$300.00								
	10/19/2020	BU	Forward Crandall subpoena/depo notice to J. Balette	0.20	\$600.00	\$120.00								
	10/20/2020	BU	Review Sunrise's portion of joint statement on Ps' omnibus motion to compel	1.50	\$600.00	\$900.00								
	10/20/2020	BU	Prepare Jt Statement and BU declaration for redaction / filing	6.30	\$600.00	\$3,780.00			2.5	1500				
	10/20/2020	BU	Email to MY re record cites for "peace of mind" representations	0.70	\$600.00	\$420.00								
	10/20/2020	BU	Final edits and forward final versions of Jt Statement and supporting papers to defense counsel for approval for filing	0.40	\$600.00	\$240.00								
	10/21/2020	BU	Compile exhibits with appropriate cover pages, under seal application and supporting declaration / proposed order, redactions / highlighting for filing Jt Stmt on mtc further discovery	6.50	\$600.00	\$3,900.00			3.5	2100				
	10/21/2020	BU	Email to defense counsel transmitting service copy of under seal filing of Jt Stmt on mtc	0.30	\$600.00	\$180.00			0.3	180				
	10/21/2020	BU	Email to A. Allyn, Judge Guilford re courtesy copy of Jt Stmt filing to Discovery Master Guilford	0.50	\$600.00	\$300.00								
	10/22/2020	BU	Emails correspondence with Judicate West re document portal and uploading Jt Stmt for access by Discovery Master Guilford	0.50	\$600.00	\$300.00			0.5	300				
	10/22/2020	BU	Email correspondence with JT re Flores list of authoritative literature relied upon and Mosby textbook produced in discovery	0.60	\$600.00	\$360.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
		Draft subpoena to Watermark re interpretive guidelines (task time document) including background research on agent for service / place of incorporation and forward same to CH for review and comment	3.40	\$600.00	\$2,040.00								
10/22/2020	BU	Review Musoke deposition transcript and email to MY re same	0.70	\$600.00	\$420.00								
10/22/2020	BU	Review Sunrise's objections and responses to Ps' 8th Set of document requests	0.30	\$600.00	\$180.00								
10/23/2020	BU	Watermark subpoena - legal/fact research re service, including communications with deposition officers located in AZ and registered agent for service of process	2.50	\$600.00	\$1,500.00								
10/23/2020	BU	Draft notice of deposition by written questions for Watermark (re task time document)	2.20	\$600.00	\$1,320.00								
10/23/2020	BU	Upload and send link to R. Bonner for expert productions to be uploaded to Relativity	0.60	\$600.00	\$360.00			0.6	360				
10/23/2020	BU	Draft and serve G. Kelly deposition notice and amended Berry depo notice	0.70	\$600.00	\$420.00								
10/23/2020	BU	Email correspondence with defense counsel re scheduling Kelly, Malone depositions	0.20	\$600.00	\$120.00								
10/23/2020	BU	Review DM's summary of Crandall deposition	0.50	\$600.00	\$300.00								
10/24/2020	KAS	Calls with CH and emails re mediation	0.50	\$795.00	\$397.50								
10/25/2020	KAS	Email to CH re Sunrise Mediation	0.20	\$795.00	\$159.00								
10/26/2020	BU	Emails with SW re remote depo protocol	0.20	\$600.00	\$120.00			0.2	120				
10/26/2020	BU	Review DM's edits to notice of deposition by written questions	0.40	\$600.00	\$240.00								
10/26/2020	BU	Review DM's email re Crandall staffing testimony re 'national benchmarks'	0.50	\$600.00	\$300.00								
10/26/2020	BU	Email correspondence with J. Gorman re continuing date supplemental briefs on Ps' mtc are due	0.30	\$600.00	\$180.00			0.3	180				
10/26/2020	BU	Outline / draft supplemental brief iso Ps' omnibus mtc	5.10	\$600.00	\$3,060.00								
10/27/2020	BU	Outline / draft supplemental brief iso Ps' omnibus mtc	2.00	\$600.00	\$1,200.00								
10/27/2020	BU	Email to MY re Kelly depo prep and attaching documents re DSS license for Sunnyvale and pertinent job descriptions	1.00	\$600.00	\$600.00								
10/27/2020	BU	Review DM's spreadsheet comparing Sunrise caregiver staffing vs CDC 2014 staffing data	0.40	\$600.00	\$240.00								
10/27/2020	BU	Email correspondence with J. Gorman re scheduling further meet and confer	0.20	\$600.00	\$120.00			0.2	120				
10/28/2020	BU	Email correspondence with CH P011598 (summary of amounts billed) re Walker depo prep	0.30	\$600.00	\$180.00								
10/28/2020	BU	Email correspondence with SW re remote depo protocol	0.20	\$600.00	\$120.00			0.2	120				
10/28/2020	BU	Emails with T. Myrick re uploading Ps' document productions to Relativity and dates of each production	0.50	\$600.00	\$300.00			0.5	300				
10/29/2020	BU	Prepare for tomorrow's M&C re outstanding discovery subject of Ps' omnibus mtc	1.50	\$600.00	\$900.00			1.5	900				
10/29/2020	BU	Outline / draft supplemental brief iso Ps' omnibus mtc, outline for M&C tomorrow re same and forward same to CH for review comment	2.00	\$600.00	\$1,200.00								
10/29/2020	BU	Email correspondence with MY re Kelly depo and producing potential exhibits beforehand	0.40	\$600.00	\$240.00								
10/29/2020	BU	Telephone call with absent class member's family member inquiring about status of class case	0.70	\$600.00	\$420.00			0.2	120				

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	10/30/2020	BU	Forward "peace of mind" exhibit (SUN001131-41) to SW for use at Walker depo	0.40	\$600.00									
	10/30/2020	BU	Telephonic M&C with A. Allyn and J. Gorman re outstanding discovery subect of Ps' omnibus mtc (discovery meet and confer with Sunrise counsel)	0.80	\$600.00									
	10/30/2020	BU	Email to CH re M&C re outstanding disocvery subject of Ps' omnibus mtc	0.50	\$600.00									
	10/30/2020	BU	Email to A. Allyn re status of forthcoming document production	0.20	\$600.00									
	10/30/2020	BU	Further edits to draft supplemental brief iso Ps' omnibus mtc, based on today's M&C	3.50	\$600.00									
	10/31/2020	BU	Review Sunrise's newest document production (SUN036)	5.90	\$600.00									
	10/31/2020	BU	Email summary of previous day's telephonic M&C re outstanding discovery and forward to team	0.40	\$600.00									
	11/1/2020	BU	Review Sunrise's newest document production (SUN036)	5.70	\$600.00									
	11/1/2020	BU	Email highlights to team re document production (SUN036)	0.30	\$600.00									
	11/2/2020	KAS	Email to GK re Sunrise - Settlement Documents	0.20	\$795.00				0.2	159				
	11/2/2020	BU	Search for and send life enrichment manager job description to DM, per request	0.50	\$600.00									
	11/2/2020	BU	Email correspondence with A. Allyn re Lacey/Ginder depositions and production of their respective documents; email with CH re same and attaching pertinent task time documents	0.70	\$600.00									
	11/2/2020	KAS	Review GK email re Sunrise - Mediation Prep - Fees/Costs	0.20	\$795.00									
	11/2/2020	BU	Email to A. Allyn attaching document referenced in previous M&C (SUN0095857)	0.20	\$600.00									
	11/2/2020	BU	Email confirming Malone depo for 11/11	0.10	\$600.00				0.1	60				
	11/2/2020	BU	Review DM email re pros/cons of proceeding with Watermark deposition by written questions	0.30	\$600.00									
	11/2/2020	BU	Draft supplemental brief iso Ps' omnibus mtc and forward same to CH for review, comment	5.40	\$600.00									
	11/2/2020	BU	Review MY email re ACHA documents for Beverly Hills facility	0.50	\$600.00									
	11/3/2020	BU	Email to W. Stein re DSS production re Sunnyvale facility and plan of operation, re Kelly depo	0.30	\$600.00									
	11/3/2020	BU	Emails with T. Needham re Sunrise University	0.20	\$600.00									
	11/3/2020	BU	Search for same on Relativity, re Kelly depo	1.50	\$600.00									
	11/3/2020	BU	Further edits to supplemental brief iso Ps omnibus mtc based on CH comments	4.10	\$600.00									
	11/3/2020	BU	Phone call with CH re supplemental brief iso Ps omnibus mtc	0.40	\$600.00									
	11/3/2020	BU	Emails with A. Allyn accepting Sunrise's proposal for production of electronic staffing and assignment sheets and requesting to file certain documents in public record	0.40	\$600.00									
	11/3/2020	BU	Draft BU declaration iso supplemental brief iso Ps' omnibus mtc	0.70	\$600.00									
	11/3/2020	BU	Redactions to supplemental brief	0.80	\$600.00				0.8	480				
	11/4/2020	BU	Malone depo prep - document review (custodial/Beverly Hills related)	3.50	\$600.00									
	11/4/2020	BU	Email correspondence with L. Valdez re filing supplemental discovery brief under seal today	0.40	\$600.00				0.4	240				
	11/4/2020	BU	Further redactions and edits to supplemental discovery brief to incorporate GW changes	4.10	\$600.00				2.5	1500				
	11/4/2020	BU	Upload under seal filing to document portal at Judicate West for Judge Guilford	0.40	\$600.00				0.4	240				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
11/4/2020	KAS	Emails to BU re Request for Deposition Dates and Malone depo	0.40	\$795.00		\$318.00								
11/4/2020	BU	Email correspondence with J. Gorman re Malone depo scheduling	0.30	\$600.00		\$180.00								
11/5/2020	BU	Malone depo prep - document review (custodial/Beverly Hills related)	6.50	\$600.00		\$3,900.00								
11/5/2020	BU	Forward certificates of service to Judicate West document portal re yesterday's discovery filing	0.30	\$600.00		\$180.00			0.3	180				
11/5/2020	BU	Email to T. Needham re Sunrise abbreviations - re depo prep	0.30	\$600.00		\$180.00								
11/5/2020	KAS	Email to BU re Sunrise docs	0.20	\$795.00		\$159.00								
11/5/2020	BU	Email correspondence with J. Gorman re Malone depo scheduling	0.20	\$600.00		\$120.00								
11/6/2020	BU	Email correspondence with J. Gorman re Malone depo scheduling	0.40	\$600.00		\$240.00								
11/6/2020	KAS	Emails to BU re J. Malone depo and depo notice	0.30	\$795.00		\$238.50								
11/6/2020	BU	Email/phone calls setting up court reporter and videographer for remote Malone deposition	1.00	\$600.00		\$600.00			0.5	300				
11/6/2020	BU	Draft Malone deposition notice and serve	0.60	\$600.00		\$360.00								
11/6/2020	BU	Malone depo prep - document review and prepare hard copy package of materials (docs, declarations, background attorney work-product)	5.80	\$600.00		\$3,480.00								
11/6/2020	KAS	Email to BU re Meet the Sunrise of Beverly Hills Team and email to CH/BU/DM re 2015 Fall Outstanding Executive Director Jason Malone, Sunrise of Beverly Hills - YouTube	0.30	\$795.00		\$238.50								
11/6/2020	KAS	Email to BU re Betelhem Shiferaw v. Sunrise Senior Living Management Inc, 2:13-cv-02171 CourtListener.com	0.20	\$795.00		\$159.00								
11/6/2020	BU	Malone depo prep - forward to KAS Malone's declaration iso class cert; Slichta declaration iso class cert; Kelly declaration iso class cert	0.60	\$600.00		\$360.00								
11/8/2020	KAS	Prep for Malone and Calls	4.00	\$795.00		\$3,180.00								
11/9/2020	KAS	Emails w/BU re Malone depo prep and important docs/citations thereto	0.30	\$795.00		\$238.50								
11/9/2020	KAS	Prep for Malone and Calls	8.00	\$795.00		\$6,360.00								
11/9/2020	BU	Draft email to defense counsel re missing assessment data and forward to CH, DM for review, comment	0.80	\$600.00		\$480.00								
11/9/2020	BU	Email to J. Gorman re witness logistics/contact info to send remote depo exhibits	0.20	\$600.00		\$120.00								
11/9/2020	BU	Prepare exhibit binders for KAS, witness, defense counsel	4.80	\$600.00		\$2,880.00			0.8	480				
11/9/2020	BU	Emails with KAS re remote depo logistics, including exhibit protocol	0.20	\$600.00		\$120.00			0.2	120				
11/9/2020	BU	Malone depo prep - further emails with KAS re important docs and citations thereto	0.30	\$600.00		\$180.00								
11/9/2020	KAS	Emails w/BU re remote depo logistics, including exhibit protocol	0.20	\$795.00		\$159.00			0.2	159				
11/9/2020	BU	Email to CH re Berry depo prep and listings key documents	0.30	\$600.00		\$180.00								
11/9/2020	KAS	Emails to BU re Sunrise - Operation Manual: Profit	0.20	\$795.00		\$159.00								
11/9/2020	KAS	Emails with BU re Malone depo	0.40	\$795.00		\$318.00								
11/9/2020	BU	Schedule practice session with remote court reporter SW Litigation Service for Wednesday's Malone depo	0.50	\$600.00		\$300.00			0.5	300				
11/9/2020	BU	Update Residency Agreement 'key provisions' chart to include newly referenced agreement	1.20	\$600.00		\$720.00								
11/10/2020	BU	Discussion with GW re history of custodian negotiations	0.20	\$600.00		\$120.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
		Draft insert re Ps' position on expanded scope and forwarding supporting materials	0.60	\$600.00		\$360.00								
11/10/2020	BU													
11/10/2020	KAS	Prep for Malone depo and Calls	9.00	\$795.00		\$7,155.00								
11/10/2020	KAS	Call CH re Malone depo	1.00	\$795.00		\$795.00								
11/10/2020	BU	Malone depo prep - pull and send potential exhibits on discrete topics (owners, capital partners) to KAS	4.50	\$600.00		\$2,700.00								
11/10/2020	BU	Remote depo prep session with SW Litigation and KAS	1.00	\$600.00		\$600.00								
11/10/2020	BU	Review DM spreadsheet re missing assessment data	0.20	\$600.00		\$120.00								
11/10/2020	BU	Finalize accompanying M&C letter re missing assessment data and serve	0.40	\$600.00		\$240.00								
11/10/2020	BU	Email to CH, GW re discovery hearing tomorrow and addressing major point of contention re contesting scope of custodians and streamlined process for raising discrete disputes	0.70	\$600.00		\$420.00								
11/11/2020	BU	Deposition of Jason Malone	8.00	\$600.00		\$4,800.00								
11/11/2020	KAS	Deposition of Jason Malone	8.00	\$795.00		\$6,360.00								
11/11/2020	BU	Review notes/papers in preparation for discovery hearing on mtc	1.00	\$600.00		\$600.00								
11/11/2020	BU	Discovery hearing on Ps' mtc before Judge Guilford, GW and BU for Ps, M. Maryott for Sunrise	1.00	\$600.00		\$600.00								
11/11/2020	BU	Forward link to electronic copies of depo exhibits to J. Gorman and email correspondence re same	0.30	\$600.00		\$180.00								
11/11/2020	KAS	Email to CH re Sunrise Malone Depo	0.20	\$795.00		\$159.00								
11/12/2020	BU	Berry depo prep - targeted Relativity searches re facilities for which Berry is responsible	5.00	\$600.00		\$3,000.00								
11/12/2020	BU	Emails with court reporter re complete set of Malone deposition exhibits, including newly marked and previously entered exhibits	0.70	\$600.00		\$420.00			0.7	420				
11/12/2020	BU	Forward Malone transcript and link to exhibit set to CH	0.30	\$600.00		\$180.00			0.3	180				
11/12/2020	BU	Falkenberg 26(f) conference with GW, K. Henderson	0.30	\$600.00		\$180.00							0.3	180
11/12/2020	BU	Emails with CH re summary of major points from discovery hearing and possible follow up points/points for clarification	0.40	\$600.00		\$240.00								
11/13/2020	KAS	Fwd email to CH/BU re J. Malone Depo 11-11-13	0.10	\$795.00		\$79.50			0.1	79.5				
11/13/2020	BU	Email to CH, SW attaching hot/moderate results of targeted Relativity search re facilities for which Berry is responsible	3.20	\$600.00		\$1,920.00								
11/13/2020	BU	Draft M&C letter following on Judge Guilford's Report and Recommendation, including proposed search terms for task time study info	2.50	\$600.00		\$1,500.00								
11/13/2020	BU	Update Residency Agreement 'key provisions' chart to include three newly referenced agreements	1.70	\$600.00		\$1,020.00								
11/16/2020	BU	Review/accept GW edits to M&C letter, include new task time custodians by name and revise search terms	1.20	\$600.00		\$720.00								
11/16/2020	BU	Further correspondence re discovery M&C letter with CH	0.20	\$600.00		\$120.00								
11/16/2020	BU	Search for a forward to CH for Berry depo a copy of job description for Director of Operations	0.60	\$600.00		\$360.00								
11/16/2020	BU	Draft proposed language re Ps' proposal for supplemental discovery response identifying email addresses/social media user names of plaintiffs and their representatives	0.30	\$600.00		\$180.00								
11/16/2020	BU	Forward draft response to Sunrise's class cert objections to Ganz and Yarnall declarations	0.20	\$600.00		\$120.00								
11/16/2020	KAS	Fwd and email to CH and BU re Berry depo	0.30	\$795.00		\$238.50								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
11/16/2020	BU	Review Malone depo transcript and excerpt helpful testimony for class cert reply and forward same to CH and GW re review, comment	4.70		\$600.00	\$2,820.00			0.7	420				
11/16/2020	KAS	Review of Malone depo prep and declaration iso class cert, slichta class cert., and Kelly declaration iso class cert	0.50		\$795.00	\$397.50								
11/16/2020	KAS	Call CH	0.20		\$795.00	\$159.00			0.2	159				
11/17/2020	BU	Email to DM, JT re comments on draft M&C letter re task time studies / databases	0.20		\$600.00	\$120.00								
11/17/2020	BU	Updated key provisions chart for inclusion in class cert reply (re common proof/Residency Agreements)	3.10		\$600.00	\$1,860.00								
11/17/2020	BU	Discrete projects for class cert Reply - track record cites, Malone video excerpts, discovery history	3.00		\$600.00	\$1,800.00								
11/17/2020	KAS	Depo of Tom Berry	6.60		\$795.00	\$5,247.00								
11/17/2020	KAS	Call CH re Berry deposition	0.40		\$795.00	\$318.00								
11/18/2020	BU	Discrete projects for class cert Reply - track record cites, Malone video excerpts, discovery history	3.50		\$600.00	\$2,100.00								
11/18/2020	BU	Search for and forward to CH documentary evidence that Sunrise calculates target hours for nurses	1.50		\$600.00	\$900.00								
11/18/2020	BU	Email to CH re deadline for Sunrise to produce task time data per most recent Report and Recommendation	0.20		\$600.00	\$120.00								
11/18/2020	BU	Pull and forward specific document requests relating to staffing data to DM re class cert reply arguments	1.50		\$600.00	\$900.00								
11/19/2020	BU	Review draft 26(f) report in Falkenberg matter and email comments to GW	0.40		\$600.00	\$240.00							0.4	240
11/19/2020	BU	Draft insert re Sunrise discovery stonewalling for inclusion in Reply iso class cert	2.00		\$600.00	\$1,200.00								
11/19/2020	BU	Phone call with CH re updated 'key provisions' chart for inclusion with class cert Reply	0.30		\$600.00	\$180.00								
11/19/2020	BU	Further edits to 'key provisions' chart and insert for Reply brief	2.10		\$600.00	\$1,260.00								
11/19/2020	BU	Draft request for judicial notice re deposition testimony from other case	2.00		\$600.00	\$1,200.00								
11/19/2020	BU	Legal cite for proposition financial elder abuse statute prohibits deceptive conduct regarding assisted living services	1.00		\$600.00	\$600.00								
11/19/2020	BU	Email and phone call with MJ re under seal filing in Central District	0.50		\$600.00	\$300.00			0.5	300				
11/19/2020	BU	Email to CH re under seal filing	0.10		\$600.00	\$60.00			0.1	60				
11/19/2020	BU	Draft insert re CLM formula for inclusion in Reply iso class cert	0.70		\$600.00	\$420.00								
11/20/2020	BU	Forward Flores Reply declaration to T. Close for cites to Reply brief	0.20		\$600.00	\$120.00								
11/20/2020	BU	Review defense's proposal re ESI search for budget variance correspondence	0.20		\$600.00	\$120.00								
11/20/2020	BU	Email to team with counter-proposal	0.50		\$600.00	\$300.00								
11/20/2020	BU	Draft request for judicial notice re deposition testimony from other case and forward same to CH for review, comment	2.20		\$600.00	\$1,320.00			0.2	120				
11/20/2020	BU	Targeted Relativity searches re 'schedule attainment' within 10% of target	0.20		\$600.00	\$120.00								
11/20/2020	BU	Email to CH re schedule attainment, for inclusion in Reply iso class cert	0.10		\$600.00	\$60.00								
11/20/2020	KAS	Email to CH/BU/GK/DM re Sunrise mediation brief	0.20		\$795.00	\$159.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees				
	11/20/2020	BU	Upload Ward deposition, exhibits, and full document production to L. Petite re Kennedy reply declaration	0.30	\$600.00					0.3		180
	11/20/2020	BU	Email to L. Petite re Kennedy Declaration iso class cert reply and documents to be used as exhibits	0.20	\$600.00							
	11/20/2020	BU	Communications with T. Close re cite checking Reply brief	0.50	\$600.00							
	11/20/2020	BU	Cite check / edit Reply iso class cert	3.50	\$600.00							
	11/20/2020	BU	Compile list of docket numbers (public vs under seal) for use in cite checking Reply brief and forward same to T. Close	1.50	\$600.00							
	11/21/2020	BU	Cite check / edit Reply iso class cert	7.10	\$600.00					2		1200
	11/21/2020	BU	Email to defense counsel listing confidential docs Ps may file under seal in connection with class cert Reply and requesting authorization to file in public record	1.50	\$600.00							
	11/22/2020	KAS	Email to BU re Heredia v. Sunrise - confidential docs	0.20	\$795.00							
	11/22/2020	BU	Email to defense counsel listing possible confidential depo cites that Ps may file under seal in connection with class cert Reply and requesting authorization to file in public record	0.80	\$600.00							
	11/22/2020	BU	Cite check / edit Reply iso class cert, including cite for elder abuse prohibiting deceptive conduct	6.70	\$600.00							
	11/23/2020	BU	Cite check / edit Reply iso class cert - record cites, depo cites	2.10	\$600.00							
	11/23/2020	BU	Finalize evidentiary objections and prepare for filing	0.90	\$600.00							
	11/23/2020	BU	Draft BU declaration iso class cert Reply, including record cites and pull exhibits	5.50	\$600.00							
	11/23/2020	BU	Redactions to expert declarations iso class cert Reply	2.30	\$600.00					1.5		900
	11/23/2020	KAS	Email to CH re Sunrise - ADL Care	0.20	\$795.00							
	11/24/2020	BU	Draft papers for filing under seal (application, BU declaration, [proposed] order)	1.50	\$600.00							
	11/24/2020	BU	Compile and send L. Valdez a complete set of exhibits to BU declaration iso class cert Reply, with under seal cover pages	3.20	\$600.00					0.7		420
	11/24/2020	BU	Draft BU declaration iso evidentiary objections and attach Ganz depo testimony	0.90	\$600.00							
	11/24/2020	BU	Emails to CH, JT re Flores Reply declaration exhibits and procedure for filing	0.30	\$600.00							
	11/24/2020	BU	Emails with CH, L. Petite re Kennedy Reply declaration exhibits and redactions to same, redact/highlight	0.70	\$600.00							
	11/24/2020	KAS	Review reply brief ISO class cert	1.50	\$795.00							
	11/24/2020	BU	Add citations to Sunrise's exhibits to class cert Reply	1.50	\$600.00							
	11/24/2020	BU	Continue redactions/highlighting of expert Reply declarations, Reply brief, BU declaration	3.70	\$600.00					3.7		2220
	11/25/2020	BU	Further edits to M&C letter re budget variance ESI, search terms for Lacey/Ginder ESI	2.10	\$600.00							
	11/25/2020	BU	Phone call with CH re M&C letter re budget variance ESI, search terms for Lacey/Ginder ESI	0.40	\$600.00							
	11/28/2020	BU	Draft mediation brief	5.90	\$600.00							
	11/28/2020	BU	Email to W. Stein re anecdotal evidence of bad outcomes	0.10	\$600.00							
	11/29/2020	BU	Draft mediation brief	4.70	\$600.00							
	11/29/2020	BU	Email to W. Stein re anecdotal evidence of bad outcomes	0.10	\$600.00							
	11/29/2020	BU	Email to GK re status	0.20	\$600.00					0.2		120
	11/30/2020	KAS	Email to BU re Sunrise - Mediation Brief	0.20	\$795.00							
	11/30/2020	BU	Draft mediation brief and forward to CH for review comment	2.50	\$600.00							

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg	Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	
	11/30/2020	BU	Email correspondence with W. Stein re other possible sources for anecdotal evidence of bad outcomes due to insufficient staffing	0.30	\$600.00	\$180.00							
	11/30/2020	BU	Draft inserts for further edits to mediation brief, per CH request, including discovery stonewalling and denial of Sunrise's ex parte application to extend schedule	2.00	\$600.00	\$1,200.00							
	11/30/2020	BU	Pull helpful Malone depo excerpts for inclusion in brief	1.50	\$600.00	\$900.00							
	12/1/2020	BU	Draft inserts for mediation brief re discovery orders, order on request for ex parte relief and forward to CH	0.50	\$600.00	\$300.00							
	12/1/2020	BU	Background / record research re 16k class size	1.00	\$600.00	\$600.00							
	12/1/2020	BU	Email to CH re sources for class size, re mediation brief	0.10	\$600.00	\$60.00							
	12/1/2020	BU	Review case file for confirmation of class size estimate of 16K, re mediation brief	1.50	\$600.00	\$900.00							
	12/1/2020	BU	Email to SW Reporting requesting video recording of 11/11 Malone deposition	0.20	\$600.00	\$120.00							
	12/1/2020	BU	Email to CH re amounts offered to class reps to settle class case, for mediation brief	0.20	\$600.00	\$120.00							
	12/1/2020	BU	Further edits to mediation brief re Order on production of CLM protocol and email with CH re same	0.60	\$600.00	\$360.00							
	12/1/2020	BU	Review/edit to operative draft of mediation brief	1.00	\$600.00	\$600.00							
	12/1/2020	KAS	Email to BU re Sunrise Mediation and email to CH re same	0.30	\$795.00	\$238.50							
	12/1/2020	BU	Finalize mediation brief inserts and forward to CH for review, comment	0.50	\$600.00	\$300.00							
	12/1/2020	BU	Review operative draft of mediation brief and email to CH re same	1.00	\$600.00	\$600.00							
	12/2/2020	KAS	Calls, texts, emails w/C. Lee	0.20	\$795.00	\$159.00							
	12/2/2020	KAS	Email to GK re Mediation and Fwd to CH/BU/M. Thamer re same	0.30	\$795.00	\$238.50							
	12/2/2020	KAS	Emails to BU re Malone depo excerpts	0.30	\$795.00	\$238.50							
	12/2/2020	BU	Final edits/redline to mediation brief, record cites, prepare attachments	4.50	\$600.00	\$2,700.00							
	12/2/2020	BU	Review Malone depo transcript and cut excerpts re evasive testimony - for mediation	3.50	\$600.00	\$2,100.00							
	12/3/2020	KAS	Conference call w/CH, BU, MT, and DM re mediation strategy	1.40	\$795.00	\$1,113.00							
	12/3/2020	BU	Review Malone depo transcript and cut excerpts re target staffing and Daily Labor Report - for mediation	2.50	\$600.00	\$1,500.00							
	12/3/2020	BU	Conference call with CH, KAS, MT, DM re mediation strategy	1.40	\$600.00	\$840.00							
	12/3/2020	BU	Upload Malone video depo excerpts for CH	0.30	\$600.00	\$180.00							
	12/3/2020	BU	Email correspondence with A. Fearn, GW, CH re continuation of Fearn depo and scheduling	0.30	\$600.00	\$180.00							
	12/3/2020	KAS	Call with CH and MT	0.50	\$795.00	\$397.50							
	12/4/2020	BU	Application for leave to file under seal / BU Under Seal Declaration	4.50	\$600.00	\$2,700.00							
	12/4/2020	BU	Email/phone call with clerk re correcting filing	0.20	\$600.00	\$120.00			0.2	120			
	12/4/2020	BU	File via ECF and serve unredacted via email	0.30	\$600.00	\$180.00			0.3	180			
	12/5/2020	KAS	Emails to CH re 12/9/20 Mediation	0.20	\$795.00	\$159.00							
	12/6/2020	KAS	Email and Fwd to BU re Malone Video Depo Excerpts	0.20	\$795.00	\$159.00							
	12/7/2020	BU	Prepare draft letter re clawback request for service and send to Gibson Dunn	0.40	\$600.00	\$240.00							
	12/7/2020	KAS	Call with MT re mediation	0.50	\$795.00	\$397.50							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
	12/8/2020 BU	Email to defense re Fearn depo dates and response to 11/25 meet and confer letter and email to CH re same	0.20	\$600.00	\$120.00									
	12/8/2020 BU	Work with L. Valdez for under seal filing post granting of application re same, under seal caption pages and forward complete exhibit set to L. Valdez	3.50	\$600.00	\$2,100.00									
	12/8/2020 BU	Phone call with CH re mediation	0.40	\$600.00	\$240.00									
	12/8/2020 BU	Zoom test runs for screen sharing - re tomorrow's mediation	0.50	\$600.00	\$300.00			0.5	300					
	12/8/2020 KAS	Call w/Ganz	0.40	\$795.00	\$318.00									
	12/9/2020 KAS	Mediation	9.50	\$795.00	\$7,552.50									
	12/9/2020 KAS	Call with class representatives and CH	0.50	\$795.00	\$397.50									
	12/8/2020 KAS	Prep for Mediation	7.50	\$795.00	\$5,962.50									
	12/9/2020 KAS	Calls w/C. Lee	0.50	\$795.00	\$397.50									
	12/9/2020 BU	troubleshoot Zoom screen sharing issues for KAS re mediation	0.70	\$600.00	\$420.00			0.7	420					
	12/9/2020 KAS	Emails with CH re Sunrise Mediation	0.30	\$795.00	\$238.50									
	12/9/2020 KAS	Call w/Fearn re Mediation	0.60	\$795.00	\$477.00									
	12/9/2020 KAS	Call w/Ganz day of mediation	0.30	\$795.00	\$238.50									
	12/10/2020 BU	Legal research re procedural options for getting before Judge Staton to raise issue of discovery cut-off date	3.00	\$600.00	\$1,800.00									
	12/10/2020 KAS	Email to CH re Mediation update	0.20	\$795.00	\$159.00									
	12/10/2020 BU	Phone call with CH re discovery cut off / outstanding discovery strategy; review Judge Staton's procedures, local rules, and FRCP 16 re discovery cut off and status conference	2.00	\$600.00	\$1,200.00									
	12/10/2020 BU	Review meet and confer letter re budget variance ESI and task time production / CLM inspection and email to DM re same	0.30	\$600.00	\$180.00									
	12/10/2020 BU	Review employment litigation complaint against Sunrise for helpful facts	0.50	\$600.00	\$300.00									
	12/10/2020 BU	Review CH summary of mediation	0.50	\$600.00	\$300.00			0.5	300					
	12/10/2020 KAS	Call with Ganz	0.30	\$795.00	\$238.50									
	12/10/2020 BU	Review CH email/meeting memo from 2017 re target staffing representations	0.70	\$600.00	\$420.00									
	12/11/2020 KAS	Email to GK re Records from Peninsula Elderly Care Home (ALF)	0.10	\$795.00	\$79.50			0.1	79.5					
	12/11/2020 BU	Forward CH notes of research on procedural options to raise issue of discovery cut-off with Court	0.20	\$600.00	\$120.00									
	12/11/2020 KAS	Email to BU and MT re Investigation effort	0.20	\$795.00	\$159.00									
	12/11/2020 BU	Forward MT background materials on ex Sunrise employees	0.40	\$600.00	\$240.00									
	12/14/2020 KAS	Call with co-counsel re settlement, case status, and trial preparation	1.50	\$795.00	\$1,192.50									
	12/14/2020 BU	Team strategy call re discovery, case status, next steps	1.50	\$600.00	\$900.00									
	12/14/2020 BU	Email correspondence with MJ re meet and confer subjects	0.30	\$600.00	\$180.00									
	12/14/2020 BU	Forward discovery order and defense's 12/10 letter re same		\$600.00	\$0.00									
	12/14/2020 BU	Email to Willie Stein re document review / subjects / protocol	0.30	\$600.00	\$180.00									
	12/14/2020 BU	Review SUN037, SUN038	6.50	\$600.00	\$3,900.00									
	12/14/2020 BU	Draft letter to counsel re production of missing assessment data and circulate to CH, DM, MJ for review, comment	0.50	\$600.00	\$300.00									
	12/14/2020 BU	Email to defense re meet and confer availability and follow up email re same	0.20	\$600.00	\$120.00									
	12/15/2020 BU	Meet and confer letter re missing assessment data and send	0.40	\$600.00	\$240.00									
	12/15/2020 BU	Letter re Watermark depo exhibit	0.50	\$600.00	\$300.00									
	12/15/2020 BU	Review meet and confer correspondence re same	0.40	\$600.00	\$240.00									
	12/15/2020 BU	Phone call with CH re same	0.20	\$600.00	\$120.00									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg	Travel
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees
Fees											
12/15/2020	KAS	Emails to CH re mediation and to BU/MT re investigation effort	0.30	\$795.00	\$238.50						
12/15/2020	BU	Email correspondence with W. Stein re doc review	0.30	\$600.00	\$180.00						
12/15/2020	BU	Review SUN038; email correspondence to team re same	6.50	\$600.00	\$3,900.00						
12/15/2020	BU	Discovery meet and confer prep	0.50	\$600.00	\$300.00						
12/15/2020	BU	Watermark subpoena edits and forward same to GW, MJ	0.50	\$600.00	\$300.00						
12/16/2020	BU	Review notes for M&C	0.20	\$600.00	\$120.00						
12/16/2020	BU	Phone call with CH re Lacey/Ginder depo prep	0.20	\$600.00	\$120.00						
12/16/2020	BU	Review SUN038 for Lacey / Ginder depo prep	3.00	\$600.00	\$1,800.00						
		Email to J. Gorman following up on this morning's meet and confer re task time data and addressing missing assessment data and text files from 12/11 production	0.50	\$600.00	\$300.00						
12/16/2020	BU	Task Time / CLM spreadsheet template and add docs to date from SUN038	1.50	\$600.00	\$900.00						
12/16/2020	BU	M&C prep call with MJ	0.40	\$600.00	\$240.00						
		M&C re budget variance, task time, CLM productions (discovery meet and confer with Sunrise counsel)	0.50	\$600.00	\$300.00						
12/16/2020	BU	Review SUN038 for Lacey / Ginder depo prep	7.30	\$600.00	\$4,380.00						
12/17/2020	BU	Investigator team meeting	0.60	\$600.00	\$360.00						
		Review Protective Order and excerpt pages pertaining to ability to disclose confidential info to investigators and email to team re same	0.40	\$600.00	\$240.00						
12/17/2020	BU	Emails with W. Stein re key points for CLM / TCB / Lacey / Ginder doc review	0.40	\$600.00	\$240.00						
12/18/2020	BU	Review SUN038 - CLM/TCB/Lacey/Ginder	4.00	\$600.00	\$2,400.00						
		Draft M&C letter requesting production of CLM staffing formula or identification of same by Bates based on Cherwin's 30(b)(6) testimony and counsel's representation at mtc hearing in November	1.50	\$600.00	\$900.00						
12/18/2020	BU	Circulate list of questions for former employees for use by investigator to team	0.30	\$600.00	\$180.00						
		Resend link to SUN038 to R. Bonner for upload to Relativity due to corrupt file	0.30	\$600.00	\$180.00						
12/21/2020	BU	Review SUN038 - CLM/TCB/Lacey/Ginder	7.00	\$600.00	\$4,200.00						
		Email to CH forwarding Cherwin 30(b)(6) depo notice from Shiferaw litigation re topic 1 - policies re staffing requirements in relation to number of residents	0.30	\$600.00	\$180.00						
12/21/2020	BU	Email to W. Stein re investigation to find former employees	0.10	\$600.00	\$60.00						
12/22/2020	BU	Review SUN038 - CLM/TCB/Lacey/Ginder and forward Google spreadsheet to team re hot docs	6.30	\$600.00	\$3,780.00						
		Email to defense following up on 12/15 request for missing assessment data and email with CH re same	0.30	\$600.00	\$180.00						
12/22/2020	BU	Review internal correspondence re relating Falkenberg to Heredia so motions heard together	0.30	\$600.00	\$180.00						
12/23/2020	BU	Emails to BU/CH/MT/DM re Sunrise and Kaiser	0.20	\$795.00	\$159.00			0.2	159		0.3 180
12/23/2020	KAS	Email to team re consumers' reasonable expectations and 'private' support personnel	0.20	\$600.00	\$120.00						
12/23/2020	BU	Review SUN038 - CLM/TCB/Lacey/Ginder	5.00	\$600.00	\$3,000.00						
		Forward newest production (SUN039) to R. Bonner for upload to Relativity	0.30	\$600.00	\$180.00			0.3	180		
12/28/2020	BU										

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs	Falkenberg	Travel	
				Worked			General					
Fees							Hrs	Fees	Hrs	Fees	Hrs	Fees
	12/28/2020 BU	Review SUN039 - CLM/TCB/Lacey/Ginder and forward hot docs to team	8.20	\$600.00	\$4,920.00							
	12/29/2020 KAS	Calls, texts, emails w/C. Lee	0.20	\$795.00	\$159.00							
	12/29/2020 KAS	Email re Sunrise - Lacey depo	0.20	\$795.00	\$159.00							
	12/29/2020 KAS	Call with investigator and W. Stein re Sunrise investigation	0.50	\$795.00	\$397.50							
	12/29/2020 BU	Review SUN039 - CLM/TCB/Lacey/Ginder and forward hot docs to team	8.50	\$600.00	\$5,100.00							
	12/29/2020 BU	Work with L. Valdez to file under seal Dkt 267 per Order at Dkt 276	0.50	\$600.00	\$300.00			0.5	300			
	12/30/2020 BU	Team emails re scheduling Lacey depo	0.20	\$600.00	\$120.00			0.2	120			
	12/30/2020 BU	Email to defense requesting available dates for Lacey deposition	0.10	\$600.00	\$60.00							
	12/30/2020 KAS	Calls, texts, emails w/C. Lee	0.80	\$795.00	\$636.00							
	12/30/2020 KAS	Email to CH re Malone transcript	0.20	\$795.00	\$159.00			0.2	159			
	12/30/2020 KAS	Calls with C. Lee, CH, WS, investigators	1.50	\$795.00	\$1,192.50			1.5	1192.5			
	12/30/2020 KAS	Emails to Kaplan and BU re mediation	0.30	\$795.00	\$238.50							
	12/30/2020 KAS	Prep for calls with C. Lee, CH, W. Stein, investigators	1.70	\$795.00	\$1,351.50							
	12/30/2020 BU	Email to W. Stein re applicability of Protective Order to investigators searching for former employees	0.30	\$600.00	\$180.00							
	12/30/2020 BU	Review SUN039 - CLM/TCB/Lacey/Ginder and forward hot docs to team	5.50	\$600.00	\$3,300.00							
	12/30/2020 BU	Email to W. Stein re notes of his review of SUN038	0.20	\$600.00	\$120.00							
	12/31/2020 BU	Review SUN039 - CLM/TCB/Lacey/Ginder and forward hot docs to team	4.50	\$600.00	\$2,700.00							
	1/4/2021 BU	Email with A. Fearn re depo continuation availability	0.20	\$600.00	\$120.00							
	1/4/2021 BU	Emails with JT re Sunrise's production of task time data	0.30	\$600.00	\$180.00							
	1/4/2021 BU	Upload all task time spreadsheets to Dropbox and forward link	0.80	\$600.00	\$480.00							
	1/4/2021 BU	Emails with JT re Sunrise's production of information relating to 'standard deviations' employed in task time studies	0.80	\$600.00	\$480.00							
	1/4/2021 BU	Emails with JT, DM re Lacey depo prep and hot docs / subject areas to cover, including TCB employee interviews, scope of TCB, data gathered in connection with TCB	0.50	\$600.00	\$300.00							
	1/4/2021 BU	Draft M&C email to defense counsel re gaps in time study data productions and forward to team for review, comment	0.50	\$600.00	\$300.00							
	1/4/2021 BU	Review SUN039 - CLM/TCB/Lacey/Ginder; new additions to Google spreadsheet and forward hot docs to team - Lacey depo prep	5.50	\$600.00	\$3,300.00							
	1/5/2021 BU	Further edits to draft M&C email re gaps in time study data productions, including insert for TCB interview notes and cite to Judge Early's Order	0.40	\$600.00	\$240.00							
	1/5/2021 BU	Review SUN039 - Lacey depo prep - re CLM/TCB	7.70	\$600.00	\$4,620.00							
	1/5/2021 BU	Emails with DM, CH re outstanding RPDs that encompass SQL database and M&C efforts, strategy to obtain	0.50	\$600.00	\$300.00							
	1/5/2021 BU	Follow up request to defense counsel for available depo dates for A. Lacey	0.40	\$600.00	\$240.00							
	1/5/2021 BU	Internal, team emails re Lacey depo	0.10	\$600.00	\$60.00			0.1	60			
	1/5/2021 BU	Background research re Judge Early's streamlined procedure for telephonic conference and email to CH re same	0.50	\$600.00	\$300.00			0.5	300			
	1/6/2021 BU	Discuss Jan 6 letter from defense re CLM inspection with team	0.30	\$600.00	\$180.00							
	1/6/2021 BU	Emails with JT re Schroyer MTS and Lacey depo	0.50	\$600.00	\$300.00							
	1/6/2021 BU	Review SUN039 - Lacey depo prep - re CLM/TCB	5.70	\$600.00	\$3,420.00							

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg	Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	
			Draft email to defense informing of intent to seek informal telephonic conference with Judge Guilford per Judge Early's streamlined procedures	1.30	\$600.00	\$780.00							
	1/7/2021	BU											
	1/7/2021	BU	Internal, team emails re discovery conference with Judge Guilford	0.50	\$600.00	\$300.00							
	1/7/2021	BU	Draft letter to Judge Guilford requesting informal telephonic conference per Judge Early's procedure, discovery background, requested relief	3.00	\$600.00	\$1,800.00							
	1/7/2021	BU	Further edits letter to Judge Guilford requesting informal telephonic conference per CH comments	0.80	\$600.00	\$480.00							
	1/7/2021	BU	Review draft ADR Status Report	0.20	\$600.00	\$120.00							
	1/7/2021	BU	Review W. Stein's spreadsheet re hot docs from SUN038 and forward same to CH	0.40	\$600.00	\$240.00							
	1/8/2021	BU	Further edits to draft letter to Judge Guilford requesting informal telephonic conference, per CH and DM comments, and forward to team	3.60	\$600.00	\$2,160.00							
	1/8/2021	BU	Finalize and draft transmittal email to defense and incorporate CH changes to letter to Judge Guilford, and serve on defense	0.60	\$600.00	\$360.00							
	1/8/2021	BU	Team emails strategizing on utility of requesting informal conference with Discovery Master Guilford	1.20	\$600.00	\$720.00							
	1/8/2021	BU	Phone call with MJ re utility of requesting informal conference with Discovery Master Guilford	0.30	\$600.00	\$180.00							
	1/8/2021	BU	Review and redline draft Opp to MTS Schroyer and circulate to team for review, comment	0.70	\$600.00	\$420.00							
	1/8/2021	KAS	Call with Kaplan	0.30	\$795.00	\$238.50							
	1/8/2021	KAS	Emails to CH re potential expert / wintess and Draft ADR statement	0.20	\$795.00	\$159.00							
	1/9/2021	KAS	Emails to GK and KG re potential expert / wintess	0.50	\$795.00	\$397.50							
	1/11/2021	BU	Review and internal discussion re defense counsel's response to 1/8 letter requesting informal conference with Discovery Master Guilford	0.70	\$600.00	\$420.00							
	1/11/2021	BU	Email to defense counsel scheduling meet and confer on open discovery issues subject to request for informal conference with Discovery Master Guilford	0.20	\$600.00	\$120.00							
	1/11/2021	BU	Draft BU declaration iso opp to MTS Schroyer declaration and forward same to CH for review, comment	4.00	\$600.00	\$2,400.00							
	1/12/2021	BU	Email to JT, DM re proposed CLM inspection, task time/CLM document productions, follow up questions for tomorrow's M&C re same	0.30	\$600.00	\$180.00							
	1/12/2021	BU	Emails with J. Gorman scheduling M&C for tomorrow	0.20	\$600.00	\$120.00			0.2	120			
	1/12/2021	BU	Emails with JT re Lacey depo prep, including abbreviations, 'tiles', 'shrink wrap'	0.80	\$600.00	\$480.00							
	1/12/2021	BU	Draft background memo on the conduct of Sunrise's task time studies (TCB)	3.00	\$600.00	\$1,800.00							
	1/12/2021	BU	Emails with GK re notice of withdrawal and forward exemplar of same	0.30	\$600.00	\$180.00			0.3	180			
	1/12/2021	BU	Prepare for tomorrow's discovery M&C, including important documents re SQL/other databases, software code, outstanding requests covering same	2.50	\$600.00	\$1,500.00							

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	1/13/2021	BU	Finalize background memo on the conduct of Sunrise's task time studies (TCB) and circulate to team	1.80	\$600.00									
	1/13/2021	BU	Phone call with DM re discovery M&C and CLM-related documents needed/still not produced	0.30	\$600.00									
	1/13/2021	BU	Prepare for telephonic M&C - outline	1.50	\$600.00									
	1/13/2021	BU	Telephonic M&C with MJ, J. Gorman, A. Allyn re assessment data; CLM time standards; Lacey/Ginder ESI; depo dates; docs referenced but not produced (discovery meet and confer with Sunrise counsel)	0.50	\$600.00									
	1/13/2021	KAS	Email to CH re ADR joint status report	0.20	\$795.00									
	1/13/2021	BU	Email summary of telephonic M&C and phone call with MJ re same	0.50	\$600.00									
	1/13/2021	BU	Draft BU declaration iso opp to MTS Flores declaration	2.00	\$600.00									
	1/14/2021	BU	Edits to Opp to MTS Schroyer; further edits to BU declaration iso opp to MTS Schroyer	3.00	\$600.00									
	1/14/2021	BU	Prepare exhibits re BU declaration iso opp to MTS Schroyer and circulate to team for review, comment	2.50	\$600.00									
	1/14/2021	BU	Email to DM re meet and confer correspondence re Schroyer expert productions	0.40	\$600.00									
	1/14/2021	BU	Review Opp to motion for JOP for redactions and email to CH, L. Valdez re same	0.30	\$600.00									
	1/14/2021	BU	Email to defense counsel re confidential depo testimony / filing under seal	0.30	\$600.00									
	1/14/2021	BU	Upload most recent doc production (SUN040) and send link to R. Bonner for upload to Relativity	0.30	\$600.00									
	1/14/2021	BU	Spot review SUN040 for production of missing assessment data	2.40	\$600.00									
	1/14/2021	BU	Email to defense counsel re Bates number(s) re SUN040	0.10	\$600.00					0.1		60		
	1/15/2021	BU	Further edits to Opp to MTS Schroyer and supporting BU declaration to address last night's document production and further CH comments and forward same to CH for review, comment	4.50	\$600.00									
	1/15/2021	BU	Draft papers for filing under seal; forward same to L. Valdez - re Opp to Schroyer MTS	1.00	\$600.00									
	1/15/2021	BU	Phone call with J. Gorman to discuss last night's production and location of electronic assessment data	0.30	\$600.00					0.3		180		
	1/15/2021	BU	Redactions to Opp to MTS Schroyer and supporting BU declaration; prepare exhibits/cover pages and forward same to L. Valdez for filing	1.50	\$600.00									
	1/15/2021	BU	Communicate with defense for corrected / replacement version of SUN0117165 and forward replacement to DM	0.30	\$600.00					0.3		180		
	1/15/2021	KAS	Review opposition to MJOP	1.00	\$795.00									
	1/18/2021	BU	Email to defense re still missing assessment data and requesting production asap	0.30	\$600.00									
	1/18/2021	BU	Review SUN040 - CLM/TCB/Lacey - Lacey depo prep	5.50	\$600.00									
	1/19/2021	BU	Work with L. Valdez to refile, per Court's Order at Dkt 283, class cert opening and reply papers under seal in single docket entries	1.50	\$600.00									
	1/19/2021	BU	Phone call with CH re request for status conference in Central District	0.40	\$600.00									
	1/19/2021	BU	Legal research re request for status conference in Central District	1.50	\$600.00									

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg	Travel
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees
	1/19/2021	BU	Draft request for status conference and forward to CH for review, comment	2.10	\$600.00	\$1,260.00						
	1/19/2021	BU	Review SUN040 - CLM/TCB/Lacey - Lacey depo prep	2.10	\$600.00	\$1,260.00						
	1/19/2021	KAS	Review minute order re refiling documents related to class cert motion	0.20	\$795.00	\$159.00						
	1/19/2021	KAS	Emails to CH and MT re Sunrise Memo	0.30	\$795.00	\$238.50						
	1/20/2021	KAS	Call with CH	0.30	\$795.00	\$238.50						
	1/20/2021	BU	Review L. Valdez's draft email to Court Clerk re Order and Dkt 283 and requesting clarification	0.20	\$600.00	\$120.00						
	1/20/2021	BU	Review SUN040 - CLM/TCB/Lacey - Lacey depo prep	2.00	\$600.00	\$1,200.00						
	1/20/2021	BU	Email to defense counsel informing of intent to file motion requesting status conference pursuant to FRCP 16 in order to determine whether revisions to case schedule are appropriate and requesting M&C re same	0.30	\$600.00	\$180.00						
	1/20/2021	BU	Search Relativity for assessments for specific resident IDs provided by DM - re missing assessment data project;	2.60	\$600.00	\$1,560.00						
	1/20/2021	BU	Pull assessments and forward same to DM and identify IDs for whom no assessments were produced	2.50	\$600.00	\$1,500.00						
	1/20/2021	BU	Emails with A. Allyn re Sunrise's interpretation of Court's Order at Dkt 283	0.30	\$600.00	\$180.00						
	1/21/2021	BU	Work with L. Valdez to refile, per Court's Order at Dkt 283, class cert opening and reply papers under seal in single docket entries	2.50	\$600.00	\$1,500.00			1	600		
	1/21/2021	BU	Telephonic M&C with A. Allyn, J. Gorman re FRCP 16 request for status conference on case schedule and email summary to CH re same (discovery meet and confer with Sunrise counsel)	0.50	\$600.00	\$300.00						
	1/21/2021	BU	Email to JT re J. Malone background and attaching Malone class cert declaration and depo transcript	0.30	\$600.00	\$180.00						
	1/21/2021	BU	Email to DM, JT re discovery history of Sunrise's production of assessment data (from Order on 1/2020 to present)	0.50	\$600.00	\$300.00						
	1/21/2021	BU	Draft Notice of Refiling of Class Certification Papers and forward same to L. Valdez	0.30	\$600.00	\$180.00						
	1/21/2021	BU	Emails to A. Allyn requesting Sunrise's position on Ps' motion requesting status conference and discussing same	1.20	\$600.00	\$720.00						
	1/21/2021	BU	Internal, team communications re Sunrise's position on P's motion requesting status conference	0.30	\$600.00	\$180.00						
	1/21/2021	BU	Review SUN040 - CLM/TCB/Lacey - Lacey depo prep	3.20	\$600.00	\$1,920.00						
	1/22/2021	BU	Email to DM, JT re CLM inspection and Lacey depo schedule	0.20	\$600.00	\$120.00						
	1/22/2021	BU	Review SUN040 - CLM/TCB/Lacey - Lacey depo prep	6.10	\$600.00	\$3,660.00						
	1/22/2021	KAS	Review updated joint status report re ADR	0.20	\$795.00	\$159.00						
	1/22/2021	KAS	Review reply ISP MTS expert declaration	0.50	\$795.00	\$397.50						
	1/23/2021	BU	Further edits to motion requesting status conference per FRCP 16, based on comments received yesterday from defense and circulate to team for review, comment	1.50	\$600.00	\$900.00						
	1/23/2021	BU	Email to A. Allyn re Lacey depo availability / dates	0.20	\$600.00	\$120.00						
	1/25/2021	BU	Review, edits to Opp to MTS Kennedy	1.50	\$600.00	\$900.00						
	1/25/2021	KAS	Review motion to set status conference per FRCP 16(a)	0.30	\$795.00	\$238.50						
	1/25/2021	BU	Per request from DM, review and excerpt Musoke depo transcript re differences in ADL care between SNF and RCFE and forward same	1.70	\$600.00	\$1,020.00						

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	1/25/2021	BU	Finalize motion requesting status conference per FRCP 16, supporting BU declaration and Ex. A, and [proposed] order and forward to L. Valdez for review, filing	2.50	\$600.00	\$1,500.00								
	1/25/2021	BU	Legal research for Opp to MTS Kennedy declaration - cite for proposition remedies pursuant to elder abuse claim include compensatory damages	1.00	\$600.00	\$600.00								
	1/26/2021	BU	Compile spreadsheet of citations to record in opening class cert brief and reply class cert brief, with new docket cites for combined under seal filings and forward same to CH	2.50	\$600.00	\$1,500.00			2.5	1500				
	1/26/2021	BU	Review SUN040 - CLM/TCB/Lacey - Lacey depo prep	1.50	\$600.00	\$900.00								
	1/26/2021	BU	Compile master list of hot documents re CLM, TCB	0.50	\$600.00	\$300.00								
	1/26/2021	BU	Draft BU declaration iso Opp to MTS Flores declaration, including exhibits	1.00	\$600.00	\$600.00								
	1/26/2021	BU	Further edits to Opp to MTS Kennedy decl and forward same to L. Valdez	0.70	\$600.00	\$420.00								
	1/27/2021	KAS	Email to CH re parent entities	0.10	\$795.00	\$79.50								
	1/27/2021	BU	Phone call with CH re Opp to MTS Flores	0.40	\$600.00	\$240.00								
	1/27/2021	BU	Further edits to Opp to MTS Flores based on conversation with CH	6.00	\$600.00	\$3,600.00								
	1/27/2021	BU	Draft BU declaration and forward to CH for review, comment	1.10	\$600.00	\$660.00								
	1/28/2021	BU	Email to CH responding to sur-reply argument Ps misrepresented Malone depo testimony re % of ADL care provided by caregivers	0.80	\$600.00	\$480.00								
	1/28/2021	BU	Prepare papers for filing under seal; redactions to Kennedy and Flores Opps to MTS and BU declarations and finalize for filing	6.50	\$600.00	\$3,900.00			2	1200				
	1/28/2021	BU	Further edits to BU declaration ISO Opp to Flores MTS	1.00	\$600.00	\$600.00								
	1/28/2021	BU	Emails with JT re same	0.30	\$600.00	\$180.00								
	1/28/2021	BU	Email to defense per local rule identifying confidential docs and requesting authorization to file in public record	0.60	\$600.00	\$360.00								
	1/29/2021	KAS	Call with CH re expert oppositions	0.50	\$795.00	\$397.50								
	1/29/2021	BU	Finalize papers for filing: Flores and Kennedy Opps to MTS, supporting BU declarations and exhibits with appropriate cover pages, under seal papers for each, redactions/highlights to each and work with L. Valdez to file	6.00	\$600.00	\$3,600.00								
	1/29/2021	BU	Email to JT, DM re proposed CLM inspection	0.20	\$600.00	\$120.00								
	1/29/2021	BU	Email to J. Gorman re missing assessment data, follow up on earlier M&C re burden in producing additional docs identified in 1/8 letter and requesting M&C	0.30	\$600.00	\$180.00								
	1/29/2021	KAS	Review minutes of Class Cert Hearing	0.30	\$795.00	\$238.50								
	1/29/2021	BU	Review CH email summarizing class cert hearing and related comments	0.50	\$600.00	\$300.00								
	1/30/2021	KAS	Call with CH re class certification	0.50	\$795.00	\$397.50								
	1/31/2021	KAS	Call with Amy Fearn	0.50	\$795.00	\$397.50								
	2/1/2021	BU	Follow up request to defense counsel re missing assessment data	0.30	\$600.00	\$180.00								
	2/1/2021	BU	Targeted Relativity searches re documents evidencing arbitration aspects of move-in process and forward results to SW	1.00	\$600.00	\$600.00								
	2/1/2021	BU	Email to CH re source of class reps' payments to Sunrise	0.30	\$600.00	\$180.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
		Compile documentary/testimonial evidence of class reps' payments to Sunrise	2.70		\$600.00	\$1,620.00								
2/1/2021	BU	Phone call with SW re arbitration issues	0.50		\$600.00	\$300.00								
2/1/2021	BU	Phone call with CH re outstanding discovery issues, post class cert hearing	0.40		\$600.00	\$240.00								
2/1/2021	KAS	Email to CH re Sunrise call tomorrow	0.20		\$795.00	\$159.00								
2/2/2021	KAS	Call with Ganz	0.70		\$795.00	\$556.50								
2/2/2021	BU	Compile list of open discovery items and forward same to CH, MJ	0.70		\$600.00	\$420.00								
2/2/2021	BU	Further to settlement call, circulate excerpt from Protective Order re use of protected information at trial	0.30		\$600.00	\$180.00								
2/2/2021	KAS	Call w/CH, GW, MJ, T. Needham, MT, and BU re settlement issues	1.00		\$795.00	\$795.00								
2/2/2021	BU	Targeted Relativity searches re docs produced evidencing arbitration rules applicable to Sunrise/resident disputes	1.00		\$600.00	\$600.00								
2/2/2021	BU	Upload newest doc production (SUN041) and send link to R. Bonner for upload to Relativity	0.20		\$600.00	\$120.00			0.2	120				
2/2/2021	BU	Spot check newest production (SUN041) and email to DM, CH re same	0.50		\$600.00	\$300.00								
2/2/2021	BU	Trial proof project - forward to MT depo transcripts, Healey Class Cert Declaration, TCB/CLM background overview memo, and doc production indices	0.50		\$600.00	\$300.00								
2/2/2021	BU	Draft M&C letter requesting conference call to discuss Ps' priority discovery requests and serve on defense	0.70		\$600.00	\$420.00								
2/2/2021	KAS	Emails to CH and BU re settlement issue and call re same	0.30		\$795.00	\$238.50								
2/2/2021	BU	Call among KAS, CH, GW, MJ, T. Needham, MT, BU re settlement issues	1.00		\$600.00	\$600.00								
2/2/2021	BU	Call with CH, MJ re outstanding discovery and strategy	0.90		\$600.00	\$540.00								
2/2/2021	BU	Compile list of facility floor plans produced by Sunrise to date and forward same to CH	0.70		\$600.00	\$420.00			0.7	420				
2/2/2021	BU	Email to CH with date class list was provided by Sunrise - re Friday hearing prep	0.20		\$600.00	\$120.00								
2/3/2021	BU	Email to CH identifying differences re FAC and 2AC - re Friday hearing prep	0.40		\$600.00	\$240.00								
2/3/2021	BU	Email to CH identifying dates Sunrise requested dates for Falkenberg depo and Ps' response(s)	0.40		\$600.00	\$240.00							0.4	240
2/3/2021	BU	Review defense response to my 2/2 email re outstanding discovery and emails with CH, DM re same	0.30		\$600.00	\$180.00								
2/3/2021	BU	Draft ROGs/RPDs on arbitration issues and forward same to SW for review, comment	1.60		\$600.00	\$960.00								
2/3/2021	BU	Further review of record for additional sources and forward M&C correspondence and Sunrise discovery responses to SW re same	0.40		\$600.00	\$240.00								
2/3/2021	BU	Email to CH re timeline for Friday's hearing and mechanics of discovery stay including Gilliam hearing transcript excerpt re same and June 2018 CMC statement	1.50		\$600.00	\$900.00								
2/3/2021	BU	Review SW additions to proposed arbitration ROGs/RPDs; email re same; forward to L. Valdez for inclusion in next Set with updated requests for task time info and updated assessment, payroll, service level billing data	3.50		\$600.00	\$2,100.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	2/4/2021	KAS	Review minute order re MJOP and MTS hearing	0.20	\$795.00	\$159.00								
	2/4/2021	BU	Forward Ward003 production to T. Myrick	0.20	\$600.00	\$120.00			0.2	120				
	2/4/2021	BU	Further edits to next set of RPDs / ROGs and forward to CH, SW for review, comment	5.00	\$600.00	\$3,000.00								
	2/4/2021	BU	Email to team re source of class reps' payments to Sunrise and attaching depo excerpts confirming same	0.70	\$600.00	\$420.00								
	2/4/2021	BU	Email to SW re earlier meet and confers re Sunrise's production of resident/family member complaints - re further meet and confer efforts and/or subsequent discovery requests	0.50	\$600.00	\$300.00								
	2/4/2021	BU	Further edits to draft set of RPDs and forward to CH, SW re review, comment	1.20	\$600.00	\$720.00								
	2/5/2021	BU	Email to DM, JT re production of extracted time standards	0.30	\$600.00	\$180.00								
	2/5/2021	KAS	Email to CH re Falkenburg Arb Petition	0.20	\$795.00	\$159.00							0.2	159
	2/5/2021	BU	Prepare for this afternoon's discovery M&C - outline, Bates references Telephonic M&C with MJ, A. Allyn, J. Gorman re assessment data, follow up requests for attachments and other docs identified but not produced; SQL database; Lacey depo; CLM inspection (discovery meet and confer with Sunrise counsel)	1.00	\$600.00	\$600.00								
	2/5/2021	BU	Draft notes of today's M&C and forward same to MJ for comment and team	0.60	\$600.00	\$360.00								
	2/8/2021	BU	Call with CH re finalizing newest set of ROGs/RPDs	1.00	\$600.00	\$600.00								
	2/8/2021	BU	Further edits to final set of ROGs/RPDs, based on call with CH, including edits to arbitration-related requests and citation to Allyn declaration	3.50	\$600.00	\$2,100.00								
	2/9/2021	KAS	Email to CH re Order re class cert and leave to amend	0.20	\$795.00	\$159.00								
	2/9/2021	KAS	Review Minute Order re Class Cert Motion and Motion for Leave to Amend	0.30	\$795.00	\$238.50								
	2/9/2021	BU	Review Order denying class cert / leave to amend	0.50	\$600.00	\$300.00								
	2/10/2021	BU	Read/review Order granting in party / denying in part Ds' motion for JOP	0.30	\$600.00	\$180.00								
	2/10/2021	KAS	Review Minute Order re MTS and MJOP	0.30	\$795.00	\$238.50								
	2/10/2021	BU	Search for and retrieve Care Manager / Lead Care Manager job descriptions for DM	0.30	\$600.00	\$180.00								
	2/10/2021	BU	Research re specific job responsibilities / title for other positions	2.90	\$600.00	\$1,740.00								
	2/10/2021	KAS	Email to CH re mediation follow up	0.20	\$795.00	\$159.00								
	2/11/2021	BU	Depo notice and subpoena for testimony for Ann Lacey and email to DM re same	0.80	\$600.00	\$480.00								
	2/11/2021	BU	Review MTS oppositions re redactions	3.20	\$600.00	\$1,920.00								
	2/11/2021	BU	Email correspondence to A. Allyn re same	0.30	\$600.00	\$180.00								
	2/11/2021	BU	M&C email re outstanding discovery to J. Gorman	0.70	\$600.00	\$420.00								
	2/11/2021	BU	Edits to draft RPDs and email to CH re same	0.50	\$600.00	\$300.00								
	2/12/2021	BU	Team call re class definition / further discovery	0.70	\$600.00	\$420.00								
	2/12/2021	BU	M&C letter re still-missing assessments and resident IDs and circulate to CH, JT for comment	0.70	\$600.00	\$420.00								
	2/12/2021	BU	Finalize M&C letter and serve	0.20	\$600.00	\$120.00								
	2/12/2021	BU	Phone call / work with L. Valdez re under seal filing and corrections (refiling oppositions to MTS with Sunrise redactions)	2.90	\$600.00	\$1,740.00			2.9	1740				

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs	Falkenberg	Travel	
					Worked	Fees	General	Fees				
							Hrs	Fees	Hrs	Fees	Hrs	Fees
			Emails to CH re Complete liability immunity: PREP Act ruling is 'significant' for Sunrise, Welltower, industry - News - McKnight's Senior Living	0.20	\$795.00	\$159.00						
	2/12/2021	KAS										
	2/12/2021	BU	Further revisions to draft RPDs and circulate to CH	0.50	\$600.00	\$300.00						
	2/12/2021	KAS	Calls, texts, emails w/C. Lee	0.60	\$795.00	\$477.00						
	2/12/2021	KAS	Call with Rob Kapan	0.30	\$795.00	\$238.50						
	2/15/2021	BU	Draft / edits to last set of RPDs and email to CH re same	1.30	\$600.00	\$780.00						
	2/16/2021	BU	Refiling oppositions to MTS with Sunrise redactions	0.80	\$600.00	\$480.00			0.8	480		
	2/16/2021	BU	Draft email to clerk re same, application requesting permission to file under seal	0.30	\$600.00	\$180.00			0.3	180		
	2/16/2021	KAS	Call w/ C. Lee	0.30	\$795.00	\$238.50						
	2/16/2021	KAS	Prep for call with C. Lee	0.20	\$795.00	\$159.00						
	2/16/2021	KAS	Emails to CH re C. Lee	0.30	\$795.00	\$238.50						
	2/16/2021	KAS	Call with DM and CH	0.30	\$795.00	\$238.50						
	2/16/2021	KAS	Prep for call with DM and CH	0.20	\$795.00	\$159.00						
	2/17/2021	BU	Phone call with L. Valdez re under seal filing; edits for App for Leave to File Under Seal	0.70	\$600.00	\$420.00			0.7	420		
	2/17/2021	BU	Draft / edits to 30(b)(6) depo notice and review cases re ability to proceed with second 30(b)(6) notice	3.20	\$600.00	\$1,920.00						
	2/18/2021	BU	Email correspondence with team re CLM inspection (date, parameters) and scheduling call re same	0.40	\$600.00	\$240.00						
	2/18/2021	BU	Email correspondence with MJ re Watermark subpoena / deposition	0.40	\$600.00	\$240.00						
	2/18/2021	BU	Email correspondence to A. Allyn re Ginder depo date, notice Set up / schedule court reporter for Lacey depo and emails with J.	0.20	\$600.00	\$120.00						
	2/19/2021	BU	Thorton re same	0.30	\$600.00	\$180.00			0.3	180		
	2/22/2021	BU	Phone call with MJ, JT, D. Schroyer re CLM inspection protocol	0.70	\$600.00	\$420.00						
	2/22/2021	BU	Draft email to J. Gorman re Ps' alternative proposal on CLM inspection protocol	0.60	\$600.00	\$360.00						
	2/22/2021	BU	Search doc productions re assessment scoring spreadsheet prepared by Lacey and reasons therefor; search for 2015 labor guidelines and emails to CH re same	3.50	\$600.00	\$2,100.00						
	2/22/2021	BU	Email correspondence with SW Reporting re Lacey depo logistics and emails with DM, JT re same	0.30	\$600.00	\$180.00			0.3	180		
	2/22/2021	BU	Determine number of last marked Ps' exhibit and email to CH re same	0.30	\$600.00	\$180.00			0.3	180		
	2/22/2021	BU	Email to defense counsel re production of email attachments in advance of Lacey deposition	0.30	\$600.00	\$180.00						
	2/23/2021	BU	Legal research re a/c privilege assertions on email copying in-house counsel	2.10	\$600.00	\$1,260.00						
	2/23/2021	BU	Draft Lacey depo questions re privilege log	0.40	\$600.00	\$240.00						
	2/23/2021	BU	Phone call with MJ re Watermark subpoena	0.20	\$600.00	\$120.00						
	2/23/2021	BU	Review SEC filings for Lacey-pertinent info / depo prep	0.70	\$600.00	\$420.00						
	2/23/2021	BU	Targeted searches re inconsistent documentation of delivered services re CLM / depo prep	4.00	\$600.00	\$2,400.00						
	2/23/2021	BU	Review newest doc production (SUN042)	0.60	\$600.00	\$360.00						
	2/23/2021	BU	Pull Sunrise 2012 10K exhibits and forward to DM, JT for Lacey depo prep	1.10	\$600.00	\$660.00						
	2/24/2021	BU	Review SEC filings for Lacey-pertinent info / depo prep	3.00	\$600.00	\$1,800.00						
	2/24/2021	BU	Review newest set of ROGs/RPDs propounded by Sunrise	0.50	\$600.00	\$300.00						

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	2/24/2021	BU	Lacey depo prep - "house duties"; list of facilities	3.10	\$600.00									
	2/24/2021	BU	Team call re Lacey depo	1.30	\$600.00									
	2/25/2021	BU	Lacey depo prep - use of task times in CLM; MedSummit engagement; related docs	3.00	\$600.00									
	2/25/2021	BU	Pull depo exhibit copies for DM / Lacey depo	3.90	\$600.00									
	2/26/2021	BU	Lacey depo	6.10	\$600.00									
	2/26/2021	BU	Phone call and emails with JT, DM re Lacey depo	0.40	\$600.00									
	3/1/2021	BU	Email to CH re discovery motion timing	0.30	\$600.00									
	3/1/2021	BU	Email to CH re FRCP 45 subpoena's and compelling appearance of out of state witness	0.50	\$600.00									
	3/1/2021	BU	Team call re Watermark (subpoena vs written questions) and strategy	0.70	\$600.00									
	3/1/2021	BU	Draft M&C letter re A. Lacey and time standards (Depo Ex 170) and CLM inspection and circulate to DM, MT, JT, CH for review, comment	1.00	\$600.00									
	3/1/2021	BU	Email to JT re metadata for SUN0137586 and searching for and forwarding SUN0137687 and related documents re TCB-related standards	1.50	\$600.00									
	3/1/2021	BU	Email to SW Reporting (court reporter) re services required for 3/18 Ginder deposition	0.20	\$600.00				0.2	120				
	3/2/2021	BU	Phone call with CH, MJ re outstanding discovery	0.50	\$600.00									
	3/2/2021	BU	Draft M&C letter re same (including TCB/CLM, SQL database, MedSummit)	4.00	\$600.00									
	3/2/2021	BU	Insert for 30(b)(6) depo notice re Topic 13	0.50	\$600.00									
	3/3/2021	KAS	Check in with investigators	0.50	\$795.00									
	3/3/2021	KAS	Review dates for disclosure from BU of witnesses/updates and potential witnesses to call at trial	0.20	\$795.00									
	3/3/2021	BU	Email correspondence with family member of absent class member; responding to inquiry and setting call	0.20	\$600.00									
	3/3/2021	BU	Finalize and serve M&C letter (TCB/CLM, SQL database, MedSummit)	1.50	\$600.00									
	3/3/2021	BU	Send KAS, MT dates for disclosure of witnesses / updates and potential witnesses to call at trial	0.40	\$600.00									
	3/3/2021	BU	Amended Motion for Class Cert - targeted searches for documents explaining CLM calculations and use of 25th percentile and communications with CH re same	4.00	\$600.00									
	3/3/2021	BU	Draft Rule 45 subpoena to MedSummit Solutions, including Ex A request for documents	2.00	\$600.00									
	3/4/2021	BU	Emails with CH re Tiffany Nobee deposition and background questions	0.30	\$600.00									
	3/4/2021	BU	Targeted searches of Relativity for answers to same	1.00	\$600.00									
	3/4/2021	BU	Request deposition dates from defense counsel	0.10	\$600.00									
	3/4/2021	BU	Review email summaries of phone call with Watermark re subpoena and motion to quash	0.30	\$600.00									
	3/4/2021	BU	Legal research re need to appear for deposition when 3d party subject to subpoena timely files motion to quash	1.70	\$600.00									
	3/4/2021	BU	Emails with team re same, strategy	0.30	\$600.00									
	3/4/2021	BU	Targeted Relativity searches for DM re DCM hours or DCM staff and helper hours, per facility and forward results of same	2.80	\$600.00									
	3/5/2021	BU	Email to CH re number of depositions taken by Ps to date	0.50	\$600.00									

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	3/5/2021	BU	Pull attachments to Nobbee spreadsheet from column G re TCB model and forward same to DM, CH	0.60	\$600.00	\$360.00								
	3/5/2021	BU	Email to defense counsel requesting meet and confer on outstanding discovery issues referenced in 3/3 letter and Sunrise's 10 depo objections and requesting depo dates for T. Nobbee	0.30	\$600.00	\$180.00								
	3/5/2021	BU	Draft MTC re outstanding discovery	2.00	\$600.00	\$1,200.00								
	3/5/2021	BU	Field call from putative class member - background investigation / fact gathering	0.60	\$600.00	\$360.00			0.6	360				
	3/8/2021	BU	Email correspondence with DM re census vs assessment data issues	0.30	\$600.00	\$180.00								
	3/8/2021	BU	Draft depo notice for Tiffany Nobbee and depo notice/subpoena for Mark Gunlicks	1.10	\$600.00	\$660.00								
	3/8/2021	BU	Finalize and serve depo notice/subpoenas and M&C letter on defense	0.50	\$600.00	\$300.00								
	3/8/2021	BU	Draft MTC re outstanding discovery	5.00	\$600.00	\$3,000.00								
	3/8/2021	BU	Phone call with CH re discovery / deadline / MTCs / depositions	0.40	\$600.00	\$240.00								
	3/8/2021	BU	Work with L. Valdez to refile Opps to Flores, Kennedy motions to strike with corrected redactions	0.50	\$600.00	\$300.00			0.5	300				
	3/8/2021	BU	Draft email to counsel re outstanding discovery / response to 10 depo limitation objection	0.50	\$600.00	\$300.00								
	3/9/2021	BU	Phone call with CH, MJ re depositions / tomorrow's M&C	0.70	\$600.00	\$420.00								
	3/9/2021	BU	Redline edits to draft class cert brief including record citations	5.00	\$600.00	\$3,000.00								
	3/9/2021	BU	Retrieve and forward updated witness disclosures to L. Valdez, MT	0.30	\$600.00	\$180.00								
	3/9/2021	BU	Email correspondence with DM re census vs assessment data issues and email to counsel re same	0.40	\$600.00	\$240.00								
	3/9/2021	BU	Outline for tomorrow's M&C	1.50	\$600.00	\$900.00								
	3/10/2021	BU	Telephonic M&C re outstanding discovery, 10 depo limit (discovery meet and confer with Sunrise counsel)	1.40	\$600.00	\$840.00								
	3/10/2021	BU	Download/review newest doc production - SUN043	0.90	\$600.00	\$540.00								
	3/10/2021	BU	Email correspondence with JT, DM re CLM inspection and missing assessments	0.30	\$600.00	\$180.00								
	3/10/2021	BU	Prep for M&C, including phone call with MJ re same	0.70	\$600.00	\$420.00								
	3/10/2021	BU	Email memorializing M&C; forward to MJ for comments	0.40	\$600.00	\$240.00								
	3/10/2021	BU	Review final version of Amended Class Cert Motion	1.50	\$600.00	\$900.00								
	3/10/2021	BU	Prepare redactions/highlights for Amended Class Cert Motion	1.00	\$600.00	\$600.00			1	600				
	3/10/2021	BU	Phone call with MJ, CH re M&C debrief	0.40	\$600.00	\$240.00								
	3/10/2021	KAS	Email to CH re Sunrise - Need best guess soon	0.10	\$795.00	\$79.50								
	3/10/2021	BU	Draft application for leave to file under seal and supporting papers and email to defense re same	1.00	\$600.00	\$600.00								
	3/11/2021	BU	Finalize under seal papers and forward to L. Valdez for filing	0.70	\$600.00	\$420.00								
	3/11/2021	BU	Phone call with CH re proposed case schedule stip, depositions - strategy	0.20	\$600.00	\$120.00								
	3/11/2021	BU	Email correspondence with DM re missing assessment data and communication / explanation for defense counsel re Ps' request for same	0.20	\$600.00	\$120.00								
	3/11/2021	BU	Phone call with CH, MJ re proposed case schedule stip / depo discovery / MTC - strategy	0.80	\$600.00	\$480.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg	Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	
		Draft MTC re 10 depos; fill cites and add doc cites demonstrating particularized need for 4 new witnesses	7.00	\$600.00	\$4,200.00							
3/11/2021	BU											
3/12/2021	BU	Review and index latest doc production	2.50	\$600.00	\$1,500.00							
3/12/2021	BU	Phone call with CH re MTC depos, stip re discovery 'pause'	0.40	\$600.00	\$240.00							
3/12/2021	BU	Targeted Relativity searches for Slichta, Belforte, Coppola invol.										
3/12/2021	BU	Valdezement with TCB/CLM and inclusion in MTC	4.40	\$600.00	\$2,640.00							
3/12/2021	BU	Legal research re MTC depos; edits to operative draft and forward to CH	1.80	\$600.00	\$1,080.00							
3/15/2021	BU	Further edits to draft MTC depos, including record and case cites and forward same to CH, MY	4.00	\$600.00	\$2,400.00							
3/15/2021	BU	Email correspondence with MJ, CH re proposal on stip to 'pause' discovery	0.30	\$600.00	\$180.00							
3/15/2021	KAS	Email to CH re witness disclosure	0.20	\$795.00	\$159.00							
3/15/2021	BU	Legal research re discoverability of fee agreement under CA vs federal law	2.50	\$600.00	\$1,500.00							
3/16/2021	BU	Team call re assessment data productions (DM, CH, MJ, JT, TM, BU)	1.00	\$600.00	\$600.00					0.4	240	
3/16/2021	BU	Draft responses to ROGs/RPDs	0.50	\$600.00	\$300.00							
3/16/2021	BU	Call with CH, MY re MTCs - strategy	2.20	\$600.00	\$1,320.00							
3/16/2021	BU	Draft stip - discovery 'pause'	0.80	\$600.00	\$480.00							
3/16/2021	BU	Draft MTC #2 (re 3/3 letter items)	3.00	\$600.00	\$1,800.00							
3/17/2021	BU	Email to defense requesting meet and confer on questions regarding two documents produced by Sunrise in response to Plaintiffs prior discovery requests regarding charges and moneys collected during the Class Period, specifically, SUN0004033 and SUN0004034	0.50	\$600.00	\$300.00							
3/17/2021	BU	Emails with MJ, CH re still outstanding discovery items and status	1.00	\$600.00	\$600.00							
3/17/2021	BU	Emails with MJ, CH re proposed stipulation and edits re case schedule/open discovery	0.30	\$600.00	\$180.00							
3/17/2021	BU	Review Judge Staton's Civil Trial Order re timing and forward same	0.20	\$600.00	\$120.00							
3/17/2021	BU	Finalize draft of MTC #2 and forward same to CH for review, comment	5.20	\$600.00	\$3,120.00							
3/17/2021	BU	Email to defense requesting details on claim of privilege in log for SUN040	0.50	\$600.00	\$300.00							
3/17/2021	BU	Email to MJ, CH re status of 2d 30(b)(6) deposition notice	0.30	\$600.00	\$180.00							
3/18/2021	BU	Review and incorporate CH edits to into of MTC #2 including reworking the Background section of Plaintiffs argument based on the revised Introduction, adding a section on the Agreed Production Matters, and adding corresponding tweaks throughout	6.00	\$600.00	\$3,600.00							
3/18/2021	BU	Phone call with CH re further revisions to MTC #2	0.50	\$600.00	\$300.00							
3/18/2021	BU	Review draft stip re case schedule / outstanding discovery	0.20	\$600.00	\$120.00							
3/18/2021	BU	Email to J. Gorman re discrepancy between resident IDs appearing on assessments and those appearing on billing service history spreadsheet and requestsing explanation	0.40	\$600.00	\$240.00							
3/18/2021	BU	Telephonic M&C with MJ, J. Gorman re missing assessment data, resident ID discrepancies, confirmation of CLM embedded task times (discovery meet and confer with Sunrise counsel)	0.80	\$600.00	\$480.00							

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	3/19/2021	BU	Draft responses, objections to Sunrise's ROGs/RPDs to Ganz, Fearn re rep agreements; forwarding to CH, GW, MJ for review, comment	1.70	\$600.00									
	3/19/2021	BU	Emails with T. Myrick responding to DM question concerning production(s) of TIFF/PDF assessments	0.40	\$600.00				0.4	240				
	3/19/2021	BU	Review J. Gorman email re proposed stipulation re case schedule, carve out for open discovery motions, and CLM inspection	0.50	\$600.00									
	3/19/2021	BU	Draft BU declaration ISO MTC #2	2.00	\$600.00									
	3/19/2021	BU	Review Sunrise's responses, objections to 9th Set of RPDs and email to team re same	0.50	\$600.00									
	3/19/2021	BU	Further edits to draft MTC #2 per CH further comments, including: shortened version of Rule 26 argument; case cites re custody/control	2.50	\$600.00									
	3/19/2021	BU	Email to J. Gorman requesting meet and confer on Sunrise's Set 9 responses	0.20	\$600.00									
	3/20/2021	BU	Call with CH, MJ re strategy for outstanding discovery / impending discovery cut off an negotiations re same, scheduling stipulation	1.00	\$600.00									
	3/21/2021	BU	Edits to further M&C communication regarding scheduling stip	0.50	\$600.00									
	3/22/2021	BU	Telephonic meet and confer among BU, MJ, J. Gorman re scheduling stip, outstanding discovery, CLM inspection (discovery meet and confer with Sunrise counsel)	1.00	\$600.00									
	3/22/2021	BU	Draft notes of 10:30 M&C call and forward to MJ for review, comment	0.40	\$600.00									
	3/22/2021	BU	Phone call with CH, MJ re 10:30 M&C and next steps re discovery, amended class cert filing	0.70	\$600.00									
	3/22/2021	BU	Draft data-related / CLM inspection mtc and accompanying BU declaration and forward to CH, MJ for review comment	9.00	\$600.00									
	3/22/2021	BU	Prep call with MJ for 10:30 M&C call re scheduling stip	0.40	\$600.00									
	3/23/2021	BU	Emails with JT re SUN016 and relation to missing assessment data re ongoing M&C efforts to obtain same	0.40	\$600.00									
	3/23/2021	BU	Review newly produced spreadsheet (SUN0138847) and forward same to DM, JT for review, comment	0.20	\$600.00									
	3/23/2021	BU	Email to defense requesting clarification re production and purpose of "SUN016 PDF Redelivery"	0.20	\$600.00									
	3/23/2021	BU	Review J. Gorman email re proposed stipulation re case schedule, carve out for open discovery motions, and CLM inspection	0.20	\$600.00									
	3/23/2021	BU	Phone call with CH re Gorman email re proposed stipulation re case schedule	0.40	\$600.00									
	3/23/2021	BU	Draft response re same and circulate to CH, MJ, DM, JT for review, comment.	2.00	\$600.00									
	3/23/2021	BU	Redline edits to draft mtc depo discovery; draft/edits to BU declaration iso same and forward to CH, MJ for review	3.50	\$600.00									
	3/23/2021	BU	Final edits to mtc data / CLM inspection, including responding to MJ	2.50	\$600.00									
	3/24/2021	BU	Review defense's revised draft of scheduling stip and communicate with CH re same	0.50	\$600.00									

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg	Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	
	3/24/2021	BU	Draft email to J. Gorman re move-in/move-out data requested by Ps and whether the move in/move out data theyve already given us includes the resident IDs weve identified as missing assessment data	0.40	\$600.00								
	3/24/2021	BU	Compile final versions of MTC data, BU declaration in support and accompanying exhibits and send to L. Valdez for fomattng, service	0.70	\$600.00								
	3/24/2021	BU	Review and approve for filing unredacted document under seal per Order at Dkt 358	0.20	\$600.00								
	3/24/2021	BU	Further edits to draft mtc depo discovery and BU declaration iso and further to CH for review, comment	1.70	\$600.00								
	3/24/2021	BU	Review finals and approve for service - mtc depo discovery and BU declaration	0.30	\$600.00								
	3/24/2021	BU	Review further edits to response to J. Gorman remail re proposed stipulation on case schedule, carve out for open discovery, CLM inspection and send to J. Gorman	0.40	\$600.00								
	3/24/2021	BU	Further edits to mtc on final discovery requests and forward to CH, MJ for review comment	3.50	\$600.00								
	3/24/2021	BU	Phone call with J. Gorman re move-in/move-out data requested by Ps	0.30	\$600.00								
	3/24/2021	BU	Communicate with DM re same (determine whether the move in/move out data theyve already given us includes the resident IDs weve identified as missing assessment data)	0.20	\$600.00								
	3/24/2021	BU	Phone call with JT, B. Peters re move-in/move-out data requested by Ps, for further response to J. Gorman	0.70	\$600.00								
	3/25/2021	BU	Forward CH M&C correspondence on privilege log issues	0.30	\$600.00								
	3/25/2021	BU	Draft response to J. Gorman re Sunrise's further supplemental productions of move in / move out and other open data items; circulate to CH, MJ for review, comment and send to J. Gorman	0.70	\$600.00								
	3/25/2021	BU	Final review and authorization to serve Ps' responses to ROGs, RFPs	0.40	\$600.00								
	3/25/2021	BU	Further edits to MTC data to account for newly produced items (spreadsheet to correct the assessment/billing service history resident ID discrepancy, confirmation that the embedded task time spreadsheet contains the only CLM standards used by Sunrise; the 4 assessments with resident IDs that were redacted previously)	8.00	\$600.00								
	3/25/2021	BU	Phone call with CH re further revisions to MTC data	0.50	\$600.00								
	3/25/2021	BU	Forward MTC data to CH for review, comment with updated BU declaration iso and transmittal email										\$0.00
	3/25/2021	BU	Phone call with CH re finalizing and service of discovery MTCs	0.30	\$600.00								\$180.00
	3/26/2021	BU	Phone calls with J. Gorman re discovery motions and further supplemental productions (discovery meet and confer with Sunrise counsel)	0.40	\$600.00								\$240.00
	3/26/2021	BU	Communicate with CH re earlier phone call with J. Gorman re discovery motions, further supplemental productions	0.30	\$600.00								\$180.00
	3/26/2021	BU	Memorialize extension for Sunrise to serve its portions of joint stips on Ps' motions to compel in exchange for firm commitment on date for CLM inspection	0.20	\$600.00								\$120.00

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
		Final edits to MTC#3 (final discovery motion), BU iso, and accompanying exhibits/cover pages and forward to CH, L. Valdez for review, service	4.00	\$600.00		\$2,400.00								
3/26/2021	BU	Review A. Allyn letter re privilege log objection and email to team re same	0.20	\$600.00		\$120.00								
3/26/2021	BU	Download/review newest doc production - SUN045 and forward link to DM, JT	0.40	\$600.00		\$240.00								
3/26/2021	BU	Forward transmittal email to L. Valdez for service of today's mtcs	0.30	\$600.00		\$180.00		0.3	180					
3/26/2021	BU	Produce P011738-11841 to Sunrise	0.20	\$600.00		\$120.00								
3/29/2021	KAS	Email to CH re revised case schedule	0.20	\$795.00		\$159.00								
3/29/2021	BU	Review Order rejecting scheduling stipulation and CH email re same	0.30	\$600.00		\$180.00								
3/29/2021	KAS	Review stipulated order to amend scheduling order	0.20	\$795.00		\$159.00								
3/30/2021	BU	Email to CH re meeting and conferring on Judge Staton's Order denying scheduling stip	0.20	\$600.00		\$120.00								
3/30/2021	BU	Discussion re meeting and conferring on Judge Staton's Order denying scheduling stip and further email communications with team re same	0.50	\$600.00		\$300.00								
3/30/2021	BU	Phone calls with J. Gorman re further meet and confer on scheduling proposal / discovery motion proposal / expert discovery cutoff (discovery meet and confer with Sunrise counsel)	1.50	\$600.00		\$900.00								
3/30/2021	BU	Phone call and further email communications with CH re talks with J. Gorman on case schedule stip	1.50	\$600.00		\$900.00								
3/31/2021	BU	Further email and telephone communications with CH, GW, MJ re case schedule stip	0.50	\$600.00		\$300.00								
3/31/2021	BU	Draft responses to J. Gorman re case schedule stip and circulate for review and comment	2.00	\$600.00		\$1,200.00								
3/31/2021	BU	Further email and telephone communications with J. Gorman re case schedule stip	1.50	\$600.00		\$900.00								
4/1/2021	BU	Draft transmittal email for response to J. Gorman and Sunrise's case schedule proposal and circulate to CH, MJ for review and comment	0.40	\$600.00		\$240.00								
4/1/2021	BU	Review DM email re update on production of assessments and billing services histories	0.40	\$600.00		\$240.00								
4/1/2021	BU	Phone call with MJ to prep for call with J. Gorman and Discovery Master Guilford re discovery motions and discovery cutoff	0.30	\$600.00		\$180.00								
4/1/2021	BU	Phone call with MJ, J. Gorman re discovery motion call with Discovery Master Guilford re discovery motions and discovery cutoff (discovery meet and confer with Sunrise counsel)	0.30	\$600.00		\$180.00								
4/1/2021	BU	Call Discovery Master Guilford with J. Gorman and MJ re discovery motions and discovery cutoff	0.10	\$600.00		\$60.00								
4/1/2021	BU	Phone calls with MJ, CH re call with J. Gorman and Discovery Master Guilford re discovery motions and discovery cutoff	0.30	\$600.00		\$180.00								
4/1/2021	BU	Review and discuss with CH, MJ Sunrise's new proposal on case scheduling stip / discovery motions and cutoff	1.50	\$600.00		\$900.00								
4/5/2021	BU	Edit 3 discovery motions to reflect "Plaintiffs Position re ..." and include "Preliminary Statement" for each	0.70	\$600.00		\$420.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs	Falkenberg	Travel	
					Worked	Fees	General	Fees				
							Hrs	Fees	Hrs	Fees	Hrs	Fees
	4/5/2021	BU	Email to defense attaching 3 revised discovery motions/link to declarations and exhibits and explaining Preliminary Statement and filing without Sunrise's portions of the briefs; review defense correspondence re same and further edits	0.80	\$600.00	\$480.00						
	4/5/2021	BU	Upload BU declarations supporting 3 motions to compel and corresponding exhibits to Dropbox for service	0.40	\$600.00	\$240.00						
	4/5/2021	BU	Phone call with CH re next steps, strategy re last day to file discovery motions	0.50	\$600.00	\$300.00						
	4/5/2021	BU	Redact 3 pending discovery motions and BU declarations in support for filing today	2.00	\$600.00	\$1,200.00			2	1200		
	4/5/2021	BU	Further edits and work with L. Valdez to finalize for filing and service of 3 discovery motions	5.70	\$600.00	\$3,420.00						
	4/6/2021	KAS	Review order continuing pretrial dates	0.10	\$795.00	\$79.50						
	4/8/2021	KAS	Review MTS expert declarations ISO class cert	0.30	\$795.00	\$238.50						
	4/12/2021	BU	Status call with CH, MJ re next steps	0.50	\$600.00	\$300.00						
	4/12/2021	BU	Draft M&C letter re outstanding discovery and proposals to moot same and forward same to CH, MJ for review, comment	2.30	\$600.00	\$1,380.00						
	4/14/2021	BU	Further edits to draft M&C letter re outstanding discovery and proposals to moot; forward to CH, MJ for review, comment	0.70	\$600.00	\$420.00						
	4/20/2021	BU	Emails with L. Valdez re clerk's communication re filing error	0.30	\$600.00	\$180.00						
	4/20/2021	KAS	Review order continuing MTS hearing	0.10	\$795.00	\$79.50						
	4/26/2021	BU	Emails with L. Valdez re complying with Court's Order to file under seal	0.20	\$600.00	\$120.00						
	4/26/2021	BU	Email to A. Fearn re update / case status	0.30	\$600.00	\$180.00						
	4/27/2021	BU	Review A. Allyn email re CLM inspection date and email to DM re same	0.30	\$600.00	\$180.00						
	4/28/2021	BU	Draft response to 4/28 M&C letter from defense re outstanding discovery items and confirming CLM inspection date and forward to CH for review, comment	0.50	\$600.00	\$300.00						
	4/28/2021	KAS	Discussion with BU re outstanding discovery motions and strategy; CLM inspection	0.60	\$795.00	\$477.00						
	4/28/2021	BU	Discussion with KAS re outstanding discovery motions and strategy; CLM inspection	0.60	\$790.00	\$474.00						
	4/28/2021	BU	Email to DM re status of updated billing service history discovery request / production	0.20	\$600.00	\$120.00						
	4/28/2021	BU	Review defense's discovery M&C letter re various updates on outstanding items and email to CH re same	0.30	\$600.00	\$180.00						
	4/29/2021	BU	Review pleadings prepared by L. Valdez to be filed under seal per Court's Order and authorize filing	0.50	\$600.00	\$300.00						
	4/30/2021	KAS	Email to CH re sunrise settlement POA	0.20	\$795.00	\$159.00						
	5/3/2021	BU	Targeted Relativity searches for documents reflecting Sunrise's policy on rest breaks and email to team re same	0.80	\$600.00	\$480.00						
	5/3/2021	BU	Forward to JT floor plans for San Rafael facility	0.40	\$600.00	\$240.00			0.4	240		
	5/3/2021	BU	Emails with JT and MJ re CLM inspection and email to A. Allyn re same	0.40	\$600.00	\$240.00						
	5/3/2021	BU	GoToMeeting with DM, JT, CH, C. Flores	1.50	\$600.00	\$900.00						
	5/4/2021	BU	Emails with JT re CLM inspection protocol, strategy	0.40	\$600.00	\$240.00						
	5/5/2021	KAS	Phone call with BU re CLM inspection (summary/highlights)	0.50	\$795.00	\$397.50						
	5/5/2021	BU	Remote CLM inspection	2.00	\$600.00	\$1,200.00						
	5/5/2021	BU	Discussion with CH, JT re CLM inspection	0.50	\$600.00	\$300.00						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
Fees														
	5/5/2021 BU	Phone call with KAS re CLM inspection (summary/highlights)	0.50		\$790.00	\$395.00								
	5/6/2021 BU	Draft summary of CLM inspection and circulate among team	2.00		\$600.00	\$1,200.00								
	5/6/2021 BU	Call with CH, JT, MJ re discovery strategy post CLM inspection	0.50		\$600.00	\$300.00								
	5/7/2021 BU	Emails with JT re status of outstanding discovery requests for data	0.30		\$600.00	\$180.00								
	5/7/2021 BU	Review CH email re CLM inspection and respond re helper hours and minimum requirements	0.70		\$600.00	\$420.00								
	5/7/2021 KAS	Texts w/Ganz	0.10		\$795.00	\$79.50								
	5/8/2021 KAS	Fwd to CH re sunrise senior living mediation follow-up	0.10		\$795.00	\$79.50								
	5/10/2021 KAS	Email to CH re settlement front	0.20		\$795.00	\$159.00								
	5/12/2021 KAS	Email to CH re settlement front	0.20		\$795.00	\$159.00								
	5/12/2021 BU	Phone call with J. Gorman re outstanding discovery requests and providing clarification re same for missing data and forward spreadsheet re same (discovery meet and confer with Sunrise counsel)	0.50		\$600.00	\$300.00								
	5/13/2021 BU	DM inventory of proof project - pull "position profiles" and cites for same re TCB project	4.10		\$600.00	\$2,460.00								
	5/13/2021 KAS	Email to CH re settlement front	0.20		\$795.00	\$159.00								
	5/14/2021 KAS	Texts w/Ganz	0.10		\$795.00	\$79.50								
	5/14/2021 BU	Phone call with CH re DM inventory of proof project - assignments/tasks	0.50		\$600.00	\$300.00								
	5/14/2021 BU	DM inventory of proof project - targeted Relativity searches re universal workers, job responsibilities, time spent on various tasks, "included positions" in target hours calculations	7.80		\$600.00	\$4,680.00								
	5/17/2021 BU	DM inventory of proof project - review depositions for record cites and add to outline	5.70		\$600.00	\$3,420.00								
	5/18/2021 BU	DM inventory of proof project - targeted Relativity searches re task bundling, time spent on various tasks, "included positions" in target hours calculations	8.00		\$600.00	\$4,800.00								
	5/19/2021 BU	DM inventory of proof project - targeted Relativity searches re task bundling, time spent on various tasks, "included positions" in target hours calculations	6.80		\$600.00	\$4,080.00								
	5/20/2021 BU	DM inventory of proof project - targeted Relativity searches re task bundling, time spent on various tasks, "included positions" in target hours calculations	4.00		\$600.00	\$2,400.00								
	5/21/2021 BU	Emails with T. Myrick re depo transcript searches re DM inventory of proof project	0.30		\$600.00	\$180.00								
	5/21/2021 BU	Initial review of newest doc production (SUN046) to R. Bonner for upload to Relativity and forward same to DM	1.40		\$600.00	\$840.00								
	5/24/2021 BU	Email to J. Gorman re 5/21 production	0.10		\$600.00	\$60.00								
	5/24/2021 BU	Emails with T. Myrick re search terms for use in searching depo transcripts and declarations re DM inventory of proof project	0.40		\$600.00	\$240.00								
	5/26/2021 BU	Email to R. Bonner re uploading SUN046 to Relativity	0.20		\$600.00	\$120.00			0.2	120				
	6/1/2021 BU	Discussion with KAS re draft Updated Joint Report on Mediation Status	0.50		\$790.00	\$395.00								
	6/1/2021 KAS	Discussion with BU re draft Updated Joint Report on Mediation Status	0.50		\$795.00	\$397.50								
	6/1/2021 BU	Email to defense attaching draft Updated Joint Report on Mediation Status, for review, comment, approval for filing	0.30		\$600.00	\$180.00								
	6/1/2021 KAS	Emails to CH re C. Lee	0.30		\$795.00	\$238.50								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	6/1/2021	KAS	Calls, texts, emails w/C. Lee	0.50	\$795.00	\$397.50								
	6/2/2021	KAS	Call with C. Lee and prep	0.50	\$795.00	\$397.50								
	6/2/2021	KAS	Prepare for call with C. Lee	0.50		\$0.00								
	6/2/2021	KAS	Call with team re status, discovery, settlement	1.20	\$795.00	\$954.00								
	6/2/2021	KAS	Review second Joint Status Report re ADR	0.20	\$795.00	\$159.00								
	6/2/2021	BU	Email with A. Allyn re Updated Joint Report on Mediation Status and forward to L. Valdez for filing	0.30	\$600.00	\$180.00								
	6/2/2021	BU	Forward meet and confer correspondence to MY re DSS production agreement	0.40	\$600.00	\$240.00								
	6/7/2021	BU	Email correspondence with absent class member contact (family member)	0.30	\$600.00	\$180.00								
	6/9/2021	BU	Draft letter to Discovery Master Guilford requesting discovery conference and forward same to CH for review, comment	3.50	\$600.00	\$2,100.00								
	6/10/2021	KAS	Discussion with BU re discovery status/strategy	0.50	\$795.00	\$397.50								
	6/10/2021	BU	Discussion with KAS re discovery status/strategy	0.50	\$790.00	\$395.00								
	6/11/2021	BU	Further edits to draft letter to Discovery Master Guilford requesting discovery conference and return to CH and L. Valdez for service, filing	1.50	\$600.00	\$900.00								
	6/11/2021	BU	Draft M&C letter to defense re discrepancies between census and produced assessments and missing assessments and circulate to CH, DM for review, comment	1.00	\$600.00	\$600.00								
	6/11/2021	BU	Email correspondence with MJ, CH re Judge Early's streamlined procedure for telephonic conference, as regards letter to Judge Guilford requesting same	0.40	\$600.00	\$240.00								
	6/14/2021	KAS	Email to GK re Flores invoices	0.20	\$795.00	\$159.00			0.2	159				
	6/14/2021	BU	Email to defense attaching M&C letter re census / assessment discrepancy issue	0.30	\$600.00	\$180.00								
	6/15/2021	BU	Emails with CH, MJ re Discovery Master Guilford's clerk's emails re availability for telephonic conference	0.20	\$600.00	\$120.00								
	6/15/2021	BU	Draft response to clerk re availability for telephonic conference	0.30	\$600.00	\$180.00			0.3	180				
	6/15/2021	BU	Email to Discovery Master Guilford's clerk responding to availability for telephonic status conference and Ps' position on reservation of rights to proceed in this fashion; attaching 3 motions to compel and supporting declarations/exhibits	0.80	\$600.00	\$480.00								
	6/16/2021	BU	Emails to CH, MJ, GW re scheduling telephonic conference with Discovery Master Guilford on 3 pending MTCs	0.30	\$600.00	\$180.00			0.3	180				
	6/18/2021	KAS	Review stipulated order re filing SAC	0.20	\$795.00	\$159.00								
	6/21/2021	BU	Email with CH re scheduling telephonic conference with Discovery Master Guilford on 3 pending MTCs	0.20	\$600.00	\$120.00			0.2	120				
	6/21/2021	BU	Email with Discovery Master Guilford's clerk re same and setting conference for 7/9	0.10	\$600.00	\$60.00			0.1	60				
	6/21/2021	BU	Phone call to Discovery Master Guilford's clerk re timing of Sunrise's written response to Ps' request for conference and email to CH re same	0.20	\$600.00	\$120.00			0.2	120				
	6/21/2021	BU	Email written request which was left on voicemail to Discovery Master Guilford	0.30	\$600.00	\$180.00			0.3	180				
	6/22/2021	BU	Emails with CH re written request which was left on voicemail to Discovery Master Guilford	0.30	\$600.00	\$180.00			0.3	180				
	6/24/2021	BU	Email to Discovery Master Guilford re Sunrise's time to respond to Ps' request for conference	0.10	\$600.00	\$60.00			0.1	60				

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs	Falkenberg	Travel
					Worked	Fees	General	Fees			
								Hrs	Fees	Hrs	Fees
	6/25/2021	KAS	Review opposition to class cert motion	2.00	\$795.00	\$1,590.00					
	6/29/2021	BU	Email to defense following up on 6/14 M&C letter requesting explanation for census/assessment discrepancies	0.20	\$600.00	\$120.00					
	6/29/2021	BU	Team call (CH, BU, GW, MJ, MY re status, assignments re amended class cert Reply brief, response to happy camper declarations, response to objections to Ganz/Yarnall declarations, support for Schroyer Reply declaration	1.10	\$600.00	\$660.00					
	6/29/2021	BU	Phone call with KAS re team call, strategy, and assignment updates - re class cert reply brief	0.70	\$790.00	\$553.00			0.7	553	
	6/29/2021	KAS	Phone call with BU re team call, strategy, and assignment updates - re class cert reply brief	0.70	\$795.00	\$556.50			0.7	556.5	
	6/29/2021	BU	Emails with MY re response to happy camper declarations and other class cert reply projects	0.30	\$600.00	\$180.00					
	6/30/2021	BU	Review happy camper declarations and compile spreadsheet of excerpts for use in evidentiary objections to same	6.50	\$600.00	\$3,900.00					
	6/30/2021	BU	Phone call with MY re response to happy camper declaration project re amended class cert Reply	0.90	\$600.00	\$540.00					
	7/1/2021	BU	Review happy camper declarations and compile spreadsheet of excerpts for use in evidentiary objections to same and forward to MY for review, comment	6.00	\$600.00	\$3,600.00					
	7/1/2021	BU	Compile evidence from depo testimony, docs produced to date re direct care hours contributed by management personnel	1.50	\$600.00	\$900.00					
	7/1/2021	BU	Emails with MY re possible objections to happy camper declarations, including local rules re required signatures, Docusign	0.50	\$600.00	\$300.00					
	7/2/2021	BU	Compile evidence from depo testimony, docs produced to date re direct care hours contributed by management personnel	5.00	\$600.00	\$3,000.00					
	7/6/2021	BU	Pull best PPTs produced in discovery with admissions that facilities are understaffed	4.00	\$600.00	\$2,400.00					
	7/6/2021	BU	Phone call with CH re amended class cert Reply and status of various projects	0.40	\$600.00	\$240.00					
	7/6/2021	BU	Compile evidence from depo testimony, docs produced to date re direct care hours contributed by management personnel and forward same to CH, DM	4.50	\$600.00	\$2,700.00					
	7/7/2021	BU	Emails with MY re happy camper objections	0.40	\$600.00	\$240.00					
	7/7/2021	BU	Review outline for objections pleading	0.50	\$600.00	\$300.00					
	7/7/2021	BU	Further Relativity searches of happy camper names for pertinent docs upon which to base objections	1.00	\$600.00	\$600.00					
	7/7/2021	BU	Pull best PPTs produced in discovery with admissions that facilities are understaffed	4.00	\$600.00	\$2,400.00					
	7/7/2021	BU	Forward same to CH for amended class cert Reply	0.30	\$600.00	\$180.00					
	7/7/2021	BU	Outline of important points for CH re telephonic hearing with Discovery Master Guilford	1.70	\$600.00	\$1,020.00					
	7/8/2021	BU	Edits to outline re objections to happy camper declarations and email to CH forwarding same	1.30	\$600.00	\$780.00					
	7/8/2021	BU	Draft insert for amended class cert Reply re CLM and forward same to CH for review, comment	1.00	\$600.00	\$600.00					
	7/8/2021	BU	Draft BU declaration ISO amended class cert Reply	6.40	\$600.00	\$3,840.00					
	7/9/2021	BU	Legal research re happy camper declaration objections	6.50	\$600.00	\$3,900.00					
	7/9/2021	BU	Email to MY re same with case cites/authorities			\$0.00					

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg	Travel		
					Worked	Fees	General		Hrs	Fees	Hrs	Fees	Hrs	Fees
							Hrs	Fees						
	7/9/2021	BU	Review CH summary of telephonic conference with Discovery Master Guilford	0.30	\$600.00									
	7/11/2021	BU	Draft evidentiary objections and forward same to MY for review, comment	5.00	\$600.00		\$3,000.00							
	7/12/2021	BU	Further edits to draft evidentiary objections	1.00	\$600.00		\$600.00							
	7/12/2021	BU	Draft BU declaration iso amended class cert Reply	6.50	\$600.00		\$3,900.00							
	7/13/2021	BU	Phone call with CH re amended class cert Reply and status of various projects	0.50	\$600.00		\$300.00							
	7/13/2021	BU	Emails with MY re evidentiary objections and weight of evidence vs admissibility	0.40	\$600.00		\$240.00							
	7/13/2021	BU	Phone call with DM re amended class cert Reply and evidence supporting position that resident care services delivered almost entirely by CMs, Med CMs, Nurses, and Care Directors; emails with DM, JT re same, attaching record evidence and cites for same	1.50	\$600.00		\$900.00							
	7/13/2021	BU	Draft BU declaration iso amended class cert Reply - pull exhibits and create appropriate cover pages	2.00	\$600.00		\$1,200.00							
	7/14/2021	BU	Further edits to draft amended Reply iso class cert per conversation with CH	2.50	\$600.00		\$1,500.00							
	7/14/2021	BU	Emails with DM, JT re amended class cert Reply and evidence supporting position that resident care services delivered almost entirely by CMs, Med CMs, Nurses, and Care Directors; level of care provided in Terrace Club; targeted Relativity searches re same	3.50	\$600.00		\$2,100.00							
	7/14/2021	BU	Email to CH with fact averments for BU declaration iso amended class cert Reply re evidence of who provides direct care	1.50	\$600.00		\$900.00							
	7/14/2021	BU	Review MY email re top 5 objections to happy camper declaration and email response re same	0.40	\$600.00		\$240.00							
	7/14/2021	KAS	Review operative draft of class certification reply brief	1.00	\$795.00		\$795.00							
	7/14/2021	BU	Review DM email re travel distance and travel time impact on DES analysis	0.40	\$600.00		\$240.00							
	7/15/2021	BU	Phone call with KAS re class certification reply briefing - status, strategy	0.70	\$790.00		\$553.00							
	7/15/2021	BU	Further edits to draft amended Reply iso class cert per conversations with CH	3.00	\$600.00		\$1,800.00							
	7/15/2021	BU	Email to defense identifying confidential docs by Bates and seeking authorization to file in public record	0.50	\$600.00		\$300.00							
	7/15/2021	BU	Further edits to BU declaration iso class cert Reply, including redactions and forward to CH re review, comment	2.50	\$600.00		\$1,500.00							
	7/15/2021	BU	compile exhibits/appropriate 'under seal' cover pages and forward same to L. Valdez	1.50	\$600.00		\$900.00		1.5	900				
	7/15/2021	KAS	Phone call with BU re class certification reply briefing - status, strategy	0.70	\$795.00		\$556.50		0.7	556.5				
	7/15/2021	BU	Review Schroyer Reply Declaration including for redactions of confidential information	1.80	\$600.00		\$1,080.00							
	7/15/2021	BU	Provide DM with Bates numbers to cite in Schroyer Reply declaration re evidence relied upon	0.80	\$600.00		\$480.00							
	7/15/2021	BU	Emails/phone calls with JT re Bates numbers to cite in Schroyer Reply declaration re evidence relied upon	0.40	\$600.00		\$240.00							
	7/15/2021	BU	Draft BU declaration iso evidentiary objections	0.40	\$600.00		\$240.00							

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked		General Hrs							
	7/15/2021	BU	Prepare/finalize response to objections to Yarnall, Ganz and forward same to L. Valdez for formatting, filing	0.70	\$600.00									
	7/15/2021	BU	Review defense letter purporting to respond to Ps' request for clarification on census/assessment discrepancies	0.40	\$600.00									
	7/15/2021	BU	Emails with JT re production of Schroyer expert materials	0.50	\$600.00									
	7/15/2021	BU	Further edit to BU declaration iso class cert Reply to address Sunrise's 7/15 letter re census/assessment discrepancies and emails with CH re same	0.50	\$600.00									
	7/16/2021	BU	Further edits to BU declaration iso class cert Reply per CH request re SUN0110524 and forward to CH re review, comment	0.40	\$600.00									
	7/16/2021	BU	Further edits to evidentiary objections	0.50	\$600.00									
	7/16/2021	BU	Compile exhibits for evidentiary objections pleading	1.00	\$600.00									
	7/16/2021	BU	Legal research re bias, motive (re evidentiary objections)	1.00	\$600.00									
	7/16/2021	BU	Emails with J. Gorman re filing under seal	0.20	\$600.00									
	7/16/2021	BU	Finalize Schroyer Reply Declaration; BU Reply Declaration; Reply brief; objections to happy camper declarations - citations, text edits, redactions/highlighting and forward to L. Valdez for filing	8.00	\$600.00									
	7/16/2021	BU	Prepare papers for filing under seal (Application, BU Declaration, [proposed] order) and forward to L. Valdez	1.00	\$600.00									
	7/16/2021	BU	Compile exhibits/appropriate 'under seal' cover pages and forward same to L. Valdez	0.40	\$600.00				0.4	240				
	7/19/2021	BU	Emails with JT re production of Schroyer expert materials	0.20	\$600.00									
	7/21/2021	BU	GoToMeeting with JT re production of Schroyer expert materials	0.50	\$600.00									
	7/21/2021	BU	Review meet and confer correspondence re reciprocal exchange of expert materials and email to CH re same	0.50	\$600.00									
	7/21/2021	KAS	Calls, texts, emails w/C. Lee	0.60	\$795.00									
	7/23/2021	BU	Review transmittal email for production of Schroyer expert materials and serve same on defense	0.40	\$600.00									
	7/27/2021	BU	Review J. Gorman email re purported deficiencies with Schroyer expert production and email to JT re same	0.20	\$600.00									
	7/27/2021	BU	Draft response to Gorman email re Schroyer production and forward to CH, DM, JT for review, comment	0.30	\$600.00									
	7/28/2021	BU	Review Opp to Schroyer MTS	1.50	\$600.00									
	7/28/2021	BU	Redact confidential material for filing and return to CH, L. Valdez for review, comment	0.30	\$600.00									
	7/28/2021	BU	Phone call with CH re Schroyer expert production, Opp to Schroyer MTS	0.40	\$600.00									
	7/29/2021	BU	Email to J. Gorman re necessary redactions to Opp to MTS Schroyer Reply declaration	0.20	\$600.00									
	7/29/2021	BU	Review and finalize 'under seal' filing papers including Opp to MTS Schroyer	2.00	\$600.00									
	7/29/2021	BU	Email to CH re Bates range for Schroyer expert production for inclusion in Second Supplemental Disclosures	0.20	\$600.00									
	8/1/2021	KAS	Discussion with BU re Daubert motions/oppositions and strategy	0.60	\$795.00									
	8/1/2021	BU	Discussion with KAS re Daubert motions/oppositions and strategy	0.50	\$790.00									
	8/1/2021	BU	Review CH email responding to argument Ps' experts improperly used information subject to Aegis Protective Order	0.60	\$600.00									

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	8/1/2021	BU	Review Aegis correspondence and filings re Aegis protective order and email response to CH, et al re same	0.70	\$600.00									
	8/1/2021	BU	Review Sunrise's 7/30 letter re purported deficiencies with Schroyer expert production and forward same to DM, JT	0.50	\$600.00									
	8/1/2021	BU	Review CH's proposed response and phone call with CH re Sunrise letter re Schroyer expert production	0.30	\$600.00									
	8/2/2021	BU	Review DM' comments on CH's 8/1 email re responsive argument about improper use of confidential materials	0.60	\$600.00									
	8/2/2021	BU	Discussion with KAS re baseclass claim of improper use of classified information	0.70	\$790.00									
	8/2/2021	BU	M&C letter responding to defense's 7/30 letter re Schroyer expert materials	2.50	\$600.00									\$1,500.00
	8/2/2021	BU	GoToMeeting with DM, JT re Schroyer expert materials	0.80	\$600.00									\$480.00
	8/3/2021	KAS	Discussion with BU re baseless claim of improper use of classified information	0.70	\$795.00									\$556.50
	8/3/2021	BU	Review DM email re additional points in response to Sunrise's [baseless] argument Ps' improperly used confidential information and MJ email re same	0.80	\$600.00									\$480.00
	8/3/2021	BU	Discussion with KAS re baseless claim of improper use of classified information	0.70	\$790.00									\$553.00
	8/11/2021	BU	Emails with L. Valdez re filing amended class cert Reply under seal per Court's 8/10 Order; review under seal papers	0.70	\$600.00									\$420.00
	8/12/2021	KAS	Review reply brief ISO class cert motion	1.00	\$795.00									\$795.00
	8/16/2021	BU	Emails with L. Valdez with list of all cites appearing in amended motion for class cert re Court's Order to refile same	3.50	\$600.00				3.5	2100				
	8/16/2021	BU	Prepare class cert re-filing including new exhibit cover pages, 3 volumes of defendants' exhibits and all papers for filing under seal and forward to L. Valdez.	6.00	\$600.00				6	3600				
	8/16/2021	KAS	Review MTS expert declaration ISO class cert	0.30	\$795.00									\$238.50
	8/16/2021	BU	Phone call with CH re Court's Order on refiling amended class cert and supporting papers	0.30	\$600.00				0.3	180				\$180.00
	8/17/2021	BU	Further edits to amended class cert filing under seal per Court's Order re same and phone calls with CH, L. Valdez re same	6.50	\$600.00				6.5	3900				\$3,900.00
	8/18/2021	BU	Email to defense re newest Sunrise productions (SUN048, SUN049) re contents, responsiveness	0.20	\$600.00									\$120.00
	8/18/2021	BU	Upload SUN048, SUN049 and send link to R. Bonner for upload to Relativity	0.20	\$600.00				0.2	120				\$120.00
	8/18/2021	KAS	Calls, texts, emails w/C. Lee	0.70	\$795.00									\$556.50
	8/18/2021	BU	Review SUN048, SUN049 - email to CH, GW, MJ re spot check and quick summary of contents	0.50	\$600.00									\$300.00
	8/19/2021	BU	Record evidence citations and further edits to Opp to Renewed MTS Flores and forward same to L. Valdez	3.50	\$600.00									\$2,100.00
	8/19/2021	BU	Email to CH re Sunny Thompson declaration excerpts related to productions SUN048, SUN049	0.40	\$600.00									\$240.00
	8/19/2021	BU	Record evidence citations and further edits to Opp to Renewed MTS Kennedy and forward to CH	2.50	\$600.00									\$1,500.00
	8/19/2021	BU	Redactions to Opp to Renewed MTS Flores, Kennedy Declarations	2.00	\$600.00									\$1,200.00
	8/20/2021	BU	Emails with GW re materials for responding defendants' surreply and forwarding same	1.30	\$600.00									\$780.00

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked		General Hrs									
		Respond to CH query re Schroyer declaration averment re sufficiency of production of assessment data in May 2021	0.30	\$600.00	\$180.00										
8/20/2021	BU	Prepare 'under seal' filing papers; final edits to Opps to Renewed MTS Flores, Kennedy and forward same to L. Valdez	5.50	\$600.00	\$3,300.00										
		Draft papers, including redactions, for 'under seal' filing of [proposed] order granting motion for class cert and forward same to L. Valdez	2.00	\$600.00	\$1,200.00			2	1200						
8/23/2021	BU	Email to CH/GW/MT/ DM/MY/BU re sunrise call w C. Lee	0.20	\$795.00	\$159.00										
8/23/2021	KAS	Email to GW re Flores Reply Declaration	0.20	\$600.00	\$120.00										
8/23/2021	BU	Calls, texts, emails w/C. Lee	0.40	\$795.00	\$318.00										
8/23/2021	KAS	Redline edits to [proposed] order granting amended motion for class cert, redactions of confidential material and forward to CH for review, comment	1.20	\$600.00	\$720.00										
8/23/2021	BU	Email to JT re Schroyer expert production re cases where testified by deposition/trial	0.50	\$600.00	\$300.00										
8/23/2021	BU	Review opposition to MTS expert declaration ISO class cert	0.70	\$795.00	\$556.50										
8/24/2021	KAS	Email to CH with record cites for average duration of Sunrise residency and evidence of failure to provide services	0.60	\$600.00	\$360.00										
8/25/2021	BU	Email to BU re Friday Hearing - Zoom Link	0.10	\$795.00	\$79.50			0.1	79.5						
8/26/2021	KAS	Targeted Relativity searches re evidence of failure to provide services and email to MY re same	3.80	\$600.00	\$2,280.00										
8/26/2021	BU	Email to CH re arbitration status of Aora, Roby, Hartock, Shiffrin	0.70	\$600.00	\$420.00										
8/26/2021	BU	Discussion with KAS of hearing on amended motion for class certification	0.50	\$790.00	\$395.00										
8/27/2021	BU	Hearing on amended motion for class certification	1.00	\$600.00	\$600.00										
8/27/2021	BU	Discussion with BU of hearing on amended motion for class certification	0.50	\$795.00	\$397.50										
8/27/2021	KAS	Emails/phone calls among team re class cert hearing	0.60	\$600.00	\$360.00							0.4	240		
8/27/2021	BU	Email to CH re Friday Hearing - Zoom Link	0.10	\$795.00	\$79.50			0.1	79.5						
8/27/2021	KAS	Review minute order re briefing schedule for MTS	0.20	\$795.00	\$159.00										
8/30/2021	BU	Email summary of 8/27 class cert hearing and circulate among team	0.70	\$600.00	\$420.00										
8/30/2021	KAS	Calls, text, emails w/C. Lee	0.20	\$795.00	\$159.00										
9/2/2021	BU	Emails with CH re case schedule, electronic assessment start date	1.00	\$600.00	\$600.00										
9/2/2021	BU	Phone call with CH, GW re same case schedule, electronic assessment start date	0.40	\$600.00	\$240.00										
9/2/2021	BU	Draft email to defense re proposal to amend case schedule	0.60	\$600.00	\$360.00										
9/2/2021	BU	Email to J. Gorman proposing stip to amend current case schedule	0.20	\$600.00	\$120.00										
9/2/2021	KAS	Call with CH re case schedule	0.30	\$795.00	\$238.50										
9/2/2021	KAS	Email to CH re existence of pre-2016 assessment data in electronic format, timeline of meet and confer re same, record evidence re same	3.50	\$600.00	\$2,100.00										
9/3/2021	BU	Phone call with CH re Gorman email re proposed stip to amend current case schedule	0.40	\$600.00	\$240.00										
9/7/2021	BU	Draft joint stipluation on proposed scheduling order and supporting BU declaration and forward to CH for review, comment	2.50	\$600.00	\$1,500.00										

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	9/8/2021	BU	Further emails, communications with CH re stip on scheduling order	0.30	\$600.00									
	9/8/2021	BU	Final edits to draft stipulation and forward same to J. Gorman for consideration	0.80	\$600.00									
	9/8/2021	KAS	Emails with CH re Sunrise-Aegis protective order issue	0.30	\$795.00									
	9/9/2021	BU	Review J. Gorman's response to proposed stip on scheduling order and email to team re same	0.40	\$600.00									
	9/10/2021	BU	Phone call with J. Gorman re proposed stip on scheduling order	0.30	\$600.00									
	9/10/2021	BU	Call with CH re Gorman call on proposed scheduling stipulation	0.20	\$600.00									
	9/10/2021	BU	Draft revised stip on case schedule and circulate to GW and DM for comment	1.90	\$600.00									
	9/10/2021	BU	Call with DM re revised case schedule stipulation	0.30	\$600.00									
	9/10/2021	BU	Review Protective Order cases from CH	3.40	\$790.00									
	9/10/2021	BU	Email to J. Gorman re revised stip on case schedule with 4 month extension	1.00	\$600.00									
	9/13/2021	BU	Review protective order cases from CH	3.00	\$790.00									
	9/13/2021	BU	Phone call with GW re Schroyer Opp to MTS/Surreply	0.40	\$600.00									
	9/13/2021	BU	Forward work product re Schroyer/MedModel/package files vs mod files	1.50	\$600.00									
	9/14/2021	BU	Legal research re use, disclosure of information protected by Protective Order	6.50	\$790.00									
	9/14/2021	BU	Email to GW attaching meet and confer correspondence on adequacy of Schroyer productions re Opp to MTS Schroyer Reply	1.00	\$600.00									
	9/15/2021	KAS	Calls, text, emails w/C. Lee	0.30	\$795.00									
	9/15/2021	BU	Legal research re use, disclosure of information protected by Protective Order	0.30	\$790.00									
	9/16/2021	KAS	Discussion with BU re stip continuing dates in case schedule, strategy re same	0.50	\$795.00									
	9/16/2021	KAS	Discussion with BU re stip on case schedule, strategy	0.50	\$795.00									
	9/16/2021	BU	Review defense's proposed edits to joint stip on case schedule	0.20	\$600.00									
	9/16/2021	BU	Emails with team re same and email with J. Gorman re same	0.70	\$600.00									
	9/16/2021	BU	Forward same to L. Valdez for filing	0.10	\$600.00									
	9/17/2021	BU	Phone call with GW re Schroyer opposition and BU declaration	0.50	\$790.00									
	9/17/2021	BU	Drafts of Schroyer opposition and BU declaration	7.00	\$790.00									
	9/17/2021	BU	Email to GW re Opp to MTS Schroyer reply re insert / background re Sunrise's unilateral discovery stay	0.70	\$600.00									
	9/20/2021	BU	Phone call with CH re billed services history	0.30	\$600.00									
	9/20/2021	BU	Email to GW re insert for FRCP 26(a)(2)(B) issue in Opp to MTS Schroyer Reply	4.00	\$600.00									
	9/20/2021	BU	Draft BU declaration iso Schroyer Opp	4.50	\$790.00									
	9/20/2021	BU	Phone call with GW re BU declaration iso Schroyer Opp	0.30	\$790.00									
	9/21/2021	BU	Email to CH re time frame for billed service history production by Sunrise	0.50	\$600.00									
	9/21/2021	BU	Email to GW re Schroyer expert production in July 2021	0.20	\$600.00									
	9/21/2021	BU	Conference call with CH, P. Kennedy, DM, GW, JT re sampling protocol for damages analysis and emails to JT, CH re same	2.30	\$600.00									
	9/21/2021	BU	Compile spreadsheet facility floor plans produced to date and forward to team	1.50	\$600.00									

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	9/21/2021	BU	Email to GW detailing documents withheld from production re Schroyer	1.80	\$600.00	\$1,080.00								
	9/21/2021	BU	Draft M&C letter re arbitration status notations contained in SUN0138872 and requesting clarification re same and serve on defense	1.00	\$600.00	\$600.00								
	9/22/2021	BU	Finalize and send M&C letter re arb status negotiations	0.40	\$790.00	\$316.00								
	9/22/2021	BU	Draft BU declaration iso opp to MTS Schroyer	4.40	\$790.00	\$3,476.00								
	9/22/2021	BU	Work with L. Valdez to complete Court ordered filing uder seal of Dkt 246	2.30	\$600.00	\$1,380.00			2.3	1380				
	9/22/2021	BU	New targeted searches re facility floor plans produced to date	3.40	\$600.00	\$2,040.00								
	9/23/2021	BU	Draft BU declaration ISO Opp to MTS Schroyer Reply declaration and forward same to GW for review, comment	7.20	\$600.00	\$4,320.00								
	9/24/2021	BU	Further edits to BU declaration ISO Opp to MTS Schroyer Reply declaration per GW request and forward same to GW for review, comment	1.50	\$600.00	\$900.00								
	9/26/2021	KAS	Calls and texts w/Ganz	0.30	\$795.00	\$238.50								
	9/27/2021	KAS	Email to CH re revised case schedule	0.10	\$795.00	\$79.50								
	9/27/2021	BU	Review draft of Opp to MTS Schroyer Reply declaration and compile notes re same	1.00	\$600.00	\$600.00								
	9/28/2021	BU	Email correspondence with GW re Opp to MTS Schroyer Reply declaration and meet and confer correspondence regarding production of pkg files	0.50	\$600.00	\$300.00								
	9/29/2021	BU	Legal research re partys non-commercial software program (or certain components thereof) was found to be proprietary and not discoverable	3.50	\$600.00	\$2,100.00								
	9/29/2021	BU	Further edits to BU declaration iso Opp to MTS Schroyer Reply declaration and brief (citations, facts), per GW's most recent iteration of brief	4.20	\$600.00	\$2,520.00								
	9/29/2021	KAS	Review operative draft of Opposition to MTS Schroyer Declaration	0.70	\$795.00	\$556.50								
	9/30/2021	BU	Further edits to BU declaration iso Opp to MTS Schroyer Reply declaration and brief (citations, facts), per GW's most recent iteration of brief	7.40	\$600.00	\$4,440.00								
	9/30/2021	BU	Email to defense seeking authorization to file confidential documents in public record	0.30	\$600.00	\$180.00								
	10/1/2021	BU	Phone call with CH re Opp to MTS Schroyer Reply	0.30	\$600.00	\$180.00								
	10/1/2021	BU	Further edits to Opp to MTS Schroyer Reply and supporting BU declaration and circulate to team	1.70	\$600.00	\$1,020.00								
	10/1/2021	BU	Email to defense requesting authorization to file confidential material in public record	0.30	\$600.00	\$180.00								
	10/1/2021	KAS	Review stipulated order to amend scheduling order	0.20	\$795.00	\$159.00								
	10/1/2021	BU	Review Schroyer Decl iso Opp to MTS Schroyer Reply declaration and forward same to CH	0.40	\$600.00	\$240.00								
	10/1/2021	BU	Final edits and prepare redacted versions of all papers re Opp to MTS Schroyer Reply declaration and forward same to L. Valdez for filing	4.60	\$600.00	\$2,760.00								
	10/1/2021	BU	Email to S. Kang re Aegis Protective Order and production of materials in Sunrise litigation and communicate with CH re same	0.40	\$600.00	\$240.00								
	10/1/2021	KAS	Email with CH re proposed email to S. Kang	0.20	\$795.00	\$159.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	10/1/2021	BU	Prepare exhibits to BU declaration iso Opp to MTS Schroyer reply	2.00	\$600.00	\$1,200.00								
	10/4/2021	BU	Gather Aegis correspondence re confidential info and related docs to CH	0.60	\$790.00	\$474.00								
	10/4/2021	BU	Emails with CH re draft text of communication between KAS and Elizabeth Chambers re Aegis Protective Order and Sunrise litigation	0.60	\$600.00	\$360.00								
	10/4/2021	KAS	Call w/C. Lee, texts, emails	0.20	\$795.00	\$159.00								
	10/4/2021	BU	Review CH strategy outline and comments to CH	1.00	\$790.00	\$790.00								
	10/4/2021	BU	Emails with CH re strategy for conference call with S. Kang re Aegis Protective Order and Sunrise litigation	0.40	\$600.00	\$240.00								
	10/4/2021	BU	Legal research re meaning of "use" of confidential information protected by protective order	4.00	\$790.00	\$3,160.00								
	10/5/2021	BU	Emails with CH re strategy for conference call with S. Kang re Aegis Protective Order and Sunrise litigation	1.10	\$600.00	\$660.00								
	10/5/2021	BU	Email response with attachments to S. Kang	0.40	\$600.00	\$240.00								
	10/5/2021	BU	Review CH outline for call with S. Kang re Aegis Protective Order and Sunrise litigation	0.40	\$600.00	\$240.00								
	10/5/2021	BU	Forward to CH Aegis-related M&C correspondence on this issue	0.20	\$600.00	\$120.00								
	10/6/2021	BU	Review correspondence re Resolution Economics / MedModel issue	0.50	\$790.00	\$395.00								
	10/6/2021	BU	Edits/comments to CH outline for call with S. Kang re Aegis Protective Order and Sunrise litigation and forward to CH for review, comment	1.80	\$600.00	\$1,080.00								
	10/7/2021	BU	Team call re Resolution Economics and MedModel	0.60	\$790.00	\$474.00								
	10/7/2021	KAS	Discussion with BU - debrief of team call re status/strategy	0.40	\$795.00	\$318.00			0.4	318				
	10/7/2021	BU	Legal research re Protective Order, disclosure, competitors, including DualDeck and global expert inputs	5.50	\$790.00	\$4,345.00								
	10/7/2021	KAS	Call w/C. Lee, texts, emails	0.70	\$795.00	\$556.50								
	10/7/2021	BU	Discussion with KAS - debrief of team call re status/strategy	0.40	\$790.00	\$316.00			0.4	316				
	10/7/2021	BU	Pull pertinent Aegis exhibits and Tucker email and forward to CH in advance of call with S. Kang re Aegis Protective Order and query re Flores' reliance on same	1.00	\$600.00	\$600.00								
	10/7/2021	BU	Discussion with BU re permitted use of confidential information in another case	1.00	\$600.00	\$600.00								
	10/8/2021	KAS	Discussion with BU re permitted use of confidential information in another case	0.50	\$795.00	\$397.50								
	10/8/2021	KAS	Call w/C. Lee, texts, emails	0.20	\$795.00	\$159.00								
	10/8/2021	BU	Emails with CH, S. Kang re phone conference scheduling	0.10	\$790.00	\$79.00								
	10/8/2021	BU	Call with CH re strategy for same	0.40	\$790.00	\$316.00								
	10/8/2021	BU	Retrieve unredacted, as-filed versions of Appx. 4-5	0.20	\$790.00	\$158.00								
	10/11/2021	BU	Review cases re attorney contact with opposing party's expert	0.50	\$600.00	\$300.00								
	10/11/2021	BU	Debrief call with CH re call with S. Kang re Aegis Protective Order and Sunrise litigation	0.20	\$600.00	\$120.00								
	10/11/2021	BU	Call with CH, S. Kang re Aegis Protective Order and Sunrise litigation	0.50	\$600.00	\$300.00								
	10/11/2021	BU	Prepare for call with CH, S. Kang re Aegis Protective Order and Sunrise litigation	0.50	\$600.00	\$300.00								
	10/11/2021	BU	Review memo re production of mod/pkg files	0.50	\$600.00	\$300.00								
	10/13/2021	BU	Call with CH, DM, JT re facility sampling for damages analysis	0.50	\$600.00	\$300.00								
	10/14/2021	BU	Review mod/pkg file memo	0.70	\$790.00	\$553.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	10/15/2021	BU	Review S. Kang email re Aegis Protective Order and Sunrise litigation	0.30	\$600.00	\$180.00								
	10/15/2021	BU	Phone call with CH, JT re same	0.30	\$600.00	\$180.00								
	10/15/2021	BU	Draft email and edits to same re same and circulate to team	0.40	\$600.00	\$240.00								
	10/18/2021	BU	fact/record research re Dr. Flores' use of Aegis task time in Sunrise litigation	0.50	\$600.00	\$300.00								
	10/18/2021	BU	Review Opps to MTS Schroyer, Flores supporting declarations and phone call with CH re call with S. Kang re Aegis Protective Order and Sunrise litigation	4.20	\$600.00	\$2,520.00								
	10/18/2021	BU	Phone call with S. Kang re Aegis Protective Order and Sunrise litigation	0.90	\$600.00	\$540.00								
	10/18/2021	BU	Email summary of phone call with S. Kang re Aegis Protective Order an Sunrise litigation	0.70	\$600.00	\$420.00								
	10/18/2021	BU	Phone call with JT re phone call with S. Kang re Aegis Protective Order and Sunrise litigation	0.40	\$600.00	\$240.00								
	10/18/2021	BU	Phone call with CH re phone call with JT re phone call with S. Kang re Aegis Protective Order and Sunrise litigation	0.50	\$600.00	\$300.00								
	10/19/2021	BU	Call with CH re S. Kang negotiations re Aegis Protective Order	0.40	\$600.00	\$240.00								
	10/19/2021	BU	Draft letter to S. Kang re same and forward for review, comment	0.70	\$600.00	\$420.00								
	10/19/2021	BU	Emails with JT re Aegis task times "used" in Sunrise and Flores' permutations and simple math analysis	0.70	\$600.00	\$420.00								
	10/20/2021	BU	Team email re next steps re Aegis Protective Order issue	1.60	\$600.00	\$960.00								
	10/20/2021	BU	Field responses re same and further edits to 'compromise proposal' re same and forward same to S. Kang	1.50	\$600.00	\$900.00								
	10/20/2021	BU	Emails with CH re ongoing negotiations with S. Kang re Aegis Protective Order and Sunrise litigation and proposed email to S. Kang re same	1.00	\$600.00	\$600.00								
	10/20/2021	BU	Targeted searches re evidentiary support for Terrace Club, Edna's Place services	2.00	\$600.00	\$1,200.00								
	10/21/2021	BU	Emails/phone calls with CH re ongoing Aegis Protective Order / Sunrise discovery issues and next steps	0.40	\$600.00	\$240.00								
	10/22/2021	BU	Phone call with KAS re Aegis/Sunrise meet and confer	0.40	\$790.00	\$316.00								
	10/22/2021	BU	Telephonic M&C w/S. Kang re Aegis Protective Order/Sunrise discovery issue	0.90	\$600.00	\$540.00								
	10/22/2021	BU	Email to GW, CH re S. Kang M&C re Aegis Protective Order/Sunrise discovery issue	0.50	\$600.00	\$300.00								
	10/22/2021	BU	Email to JT, L. Petite with link to Sunrise facility floor plans produced to date	0.50	\$600.00	\$300.00								
	10/22/2021	BU	Email summary of M&C w/S. Kang re Aegis Protective Order an Sunrise discovery issue	0.30	\$600.00	\$180.00								
	10/22/2021	BU	Email to CH containing evidentiary support for Terrace Club, Edna's Place services	1.00	\$600.00	\$600.00								
	10/22/2021	BU	Forward Sunrise Protective Order to S. Kang	0.20	\$600.00	\$120.00								
	10/22/2021	BU	MTS hearing prep - response to CH queries re no arbitration identification and residency agreements for those individuals	1.70	\$600.00	\$1,020.00								
	10/22/2021	KAS	Phone call with BU re Aegis/Sunrise meet and confer	0.40	\$795.00	\$318.00								
	10/25/2021	BU	Telephonic M&C w/S. Kang re Aegis Protective Order/Sunrise discovery issue	0.50	\$600.00	\$300.00								
	10/25/2021	BU	Email outline of today's M&C w/S. Kang to CH and review comments re same	0.70	\$600.00	\$420.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
	10/26/2021	BU	Telephonic M&C w/S. Kang re Aegis Protective Order/Sunrise discovery issue	0.50	\$600.00	\$300.00								
	10/26/2021	BU	Emails with JT re agreement between parties on reciprocal exchange of expert materials	0.50	\$600.00	\$300.00								
	10/26/2021	BU	Conversation with CH re S. Kang discussions on Aegis Protective Order and Sunrise discovery and email to S. Kang re same	0.50	\$600.00	\$300.00								
	10/26/2021	BU	Phone call with DM re strategy for Opp to Ps' experts (Schroyer, Flores) MTS and relation to Aegis Protective Order issue	0.60	\$600.00	\$360.00								
	10/26/2021	BU	Email to CH re further telephonic M&C w/S. Kang re Aegis Protective Order and Sunrise discovery	0.30	\$600.00	\$180.00								
	10/27/2021	BU	Draft letter memorializing Aegis Protective Order discussions	1.00	\$600.00	\$600.00								
	10/27/2021	BU	Draft transmittal letter to Sunrise re production of Aegis depo Ex. 45 (task times)	2.30	\$600.00	\$1,380.00								
	10/27/2021	BU	Targeted searches re CH MTS hearing project re "fees" and residency agreements re Kennedy damage calculations (Remiscence and room/board)	3.00	\$600.00	\$1,800.00								
	10/27/2021	BU	Update KAS on Aegis/Sunrise protective order issue	0.30	\$790.00	\$237.00								
	10/27/2021	KAS	Receive update from BU on Aegis/Sunrise protective order issue	0.30	\$795.00	\$238.50								
	10/27/2021	BU	Conference call with CH, GW re MTS hearing prep	1.50	\$600.00	\$900.00								
	10/27/2021	KAS	Call with BU re hearing prep and related tasks	0.50	\$795.00	\$397.50								
	10/27/2021	BU	Call with KAS re hearing prep tasks	0.50	\$790.00	\$395.00								
	10/28/2021	BU	Targeted searches re CH MTS hearing project re "fees" and residency agreements re Kennedy damage calculations (Remiscence and room/board)	5.30	\$600.00	\$3,180.00								
	10/28/2021	KAS	Review minute order continuing hearing on MTS	0.10	\$795.00	\$79.50			0.1	79.5				
	10/28/2021	BU	Prepare Aegis Depo Ex 45 for production; finalize and serve with transmittal email	0.70	\$600.00	\$420.00								
	11/1/2021	BU	Review/cite check objections to Crandall Reply declaration, review errata, draft BU declaration for Crandall Reply objections and forward to CH for review, comment	0.80	\$600.00	\$480.00								
	11/3/2021	BU	Insert response re why TIFF assessments were not adequate, re MTS/Class Cert hearing prep	4.40	\$600.00	\$2,640.00								
	11/3/2021	BU	Review Marks/Thornton correspondence re counter arguments to DES criticisms	0.70	\$600.00	\$420.00								
	11/4/2021	BU	Pull BU declarations and exhibits re MTS Flores Opp	0.60	\$600.00	\$360.00								
	11/4/2021	BU	MTS/class cert hearing prep - record cites for Reminiscence program brochure and related docs	2.50	\$600.00	\$1,500.00								
	11/5/2021	KAS	Class certification / MTS hearing	1.00	\$795.00	\$795.00								
	11/5/2021	BU	Class certification and MTS hearing	1.00	\$600.00	\$600.00								
	11/5/2021	KAS	Email correspondence with BU re class certification hearing / questions	0.30	\$795.00	\$238.50								
	11/10/2021	BU	Discussion with KAS re C. Lee 'settlement / high-low' proposal	0.30	\$600.00	\$180.00								
	11/10/2021	KAS	Call w/C. Lee texts, emails	0.80	\$795.00	\$636.00								
	11/10/2021	KAS	Conference call w/BU, CH, D.M, GW, MJ re C. Lee settlement/high-low proposal	0.70	\$795.00	\$556.50								
	11/10/2021	KAS	Discussion w/BU re C. Lee's settlement/high-low proposal	0.30	\$795.00	\$238.50								
	11/10/2021	BU	Conference call among KAS, CH, DM, GW, MJ re C. Lee 'settlement / high-low' proposal	0.70	\$600.00	\$420.00								
	11/12/2021	KAS	Call w/C. Lee, texts, emails	0.20	\$795.00	\$159.00								
	11/15/2021	KAS	Email to GK re Lodestar fees/costs	0.20	\$795.00	\$159.00			0.2	159				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs	Falkenberg	Travel	Fees
				Worked			General					
Fees							Hrs	Fees	Hrs	Fees	Hrs	Fees
	12/2/2021 BU	Email correspondence with CH re exhibit reflecting Sunrise's financial status / proportionality re 26(f)	0.50	\$790.00	\$395.00							
	12/2/2021 BU	Email correspondence with CPT Group re class notice, schedule call	0.40	\$790.00	\$316.00							
	12/2/2021 BU	Forward CPT quote to MJ, email re same	0.20	\$790.00	\$158.00							
	12/2/2021 BU	Review file re Sunrise's ability to produce assessment data in electronic format and Nobbie comments re same, if any, and forward to CH, JT	1.00	\$790.00	\$790.00							
	12/3/2021 BU	Prep for call with J. Green (CPT Group) re class notice - review quote and compile list of new questions/alternatives	0.30	\$600.00	\$180.00							
	12/3/2021 BU	Emails with team, H. Adams re discovery motion hearing date	0.30	\$600.00	\$180.00							
	12/3/2021 GK	Call with BU and CPT Group	0.20	\$475.00	\$95.00							
	12/3/2021 BU	Phone call with J. Green (CPT Group) and GK re class notice	0.50	\$600.00	\$300.00							
	12/3/2021 BU	Review combined Nobbie CLM inspection notes (BU/JT compilation)	0.70	\$790.00	\$553.00							
	12/6/2021 BU	Draft stipulation to add S. Warren/Trails Law Group to list of class counsel and forward same to J. Gorman	0.50	\$600.00	\$300.00							
	12/6/2021 BU	Email to J. Gorman re status of redline on proposed class notice	0.20	\$600.00	\$120.00							
	12/7/2021 KAS	Discussion with BU re class notice, CPT Group	0.50	\$795.00	\$397.50			0.5	397.5			
	12/7/2021 BU	Discussion with KAS re class notice, CPT Group	0.50	\$600.00	\$300.00			0.5	300			
	12/7/2021 BU	Emails with J. Gorman re scheduling M&C to discuss redline of class notice	0.20	\$600.00	\$120.00			0.2	120			
	12/8/2021 BU	Telephonic M&C with MJ and J. Gorman re class notice and outstanding discovery motions (discovery meet and confer with Sunrise counsel)	0.60	\$600.00	\$360.00							
	12/8/2021 BU	Email summary of telephonic meet and confer to CH	0.30	\$600.00	\$180.00							
	12/8/2021 BU	Record cite for estimated aggregate damages for narrowed 'not subject to arbitration' class	0.30	\$600.00	\$180.00							
	12/8/2021 KAS	Call w/C. Lee, texts, emails	0.50	\$795.00	\$397.50							
	12/8/2021 BU	Response to J. Gorman re compromise proposals on Ps' discovery motions	0.60	\$600.00	\$360.00							
	12/8/2021 BU	Email to J. Green (CPT Group) re quote for class notice dissemination	0.10	\$600.00	\$60.00							
	12/8/2021 BU	Draft joint statement on outstanding discovery issues and forward to CH for review/comment	2.70	\$600.00	\$1,620.00							
	12/8/2021 BU	Compile list of questions for J. Gorman re procedural posture, motions, schedule	2.40	\$790.00	\$1,896.00							
	12/9/2021 BU	Emails with J. Green (CPT Group) re mechanics of dissemination of class notice	0.30	\$600.00	\$180.00							
	12/9/2021 BU	Phone call with J. Gorman re class notice and outstanding discovery motions and email summary to CH, MJ re same (discovery meet and confer with Sunrise counsel)	1.50	\$600.00	\$900.00							
	12/9/2021 KAS	Call w/C. Lee, texts, emails	0.30	\$795.00	\$238.50							
	12/9/2021 BU	Draft proposed response to J. Gorman re counter-proposal on Ps' discovery motions	1.00	\$600.00	\$600.00							
	12/9/2021 BU	Draft joint statement on outstanding discovery issues and forward same to CH for review/comment/further edits	2.50	\$790.00	\$1,975.00							
	12/9/2021 BU	Emails with CH, MJ re response to J. Gorman re class notice issues	1.00	\$600.00	\$600.00							
	12/9/2021 BU	Emails and phone calls with J. Gorman re class notice issues	0.80	\$600.00	\$480.00							

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	12/9/2021	BU	Record cites for CH	0.40	\$600.00	\$240.00								
	12/10/2021	BU	Email to J. Gorman requesting comments on draft proposed order re class notice	0.10	\$600.00	\$60.00								
	12/10/2021	BU	Telephone call with CH re M&C re class notice	0.50	\$600.00	\$300.00								
	12/10/2021	BU	Phone call with CH re class notice edits; edits to class notice and forward to J. Gorman	1.00	\$600.00	\$600.00								
	12/10/2021	BU	Draft class notice postcards and email same to CH for review/comment	0.60	\$600.00	\$360.00								
	12/10/2021	BU	Emails with J. Green (CPT Group) re address checks for current/operable mailing addresses	0.20	\$600.00	\$120.00								
	12/10/2021	BU	Further edits, cites to joint statement regarding class notice and forward same to J. Gorman	1.90	\$600.00	\$1,140.00								
	12/10/2021	BU	Telephonic meet and confer on class notice with MJ, J. Gorman	2.50	\$600.00	\$1,500.00								
	12/10/2021	BU	Further edits and emails with CH, MJ re same, re revised drafts of joint statement on class notice from J. Gorman	5.60	\$600.00	\$3,360.00								
	12/10/2021	KAS	Review status report re proposed form of class notice	0.50	\$795.00	\$397.50								
	12/12/2021	BU	Review MJ/CH emails re strategy for ongoing negotiations on class notice	0.50	\$600.00	\$300.00								
	12/13/2021	KAS	Call w/C. Lee, texts, emails	0.40	\$795.00	\$318.00								
	12/13/2021	BU	Review opposition to Sunrise's 23(f) petition	1.00	\$600.00	\$600.00								
	12/13/2021	BU	Email to J. Gorman renewing request re class list contact info and confirming no communications with class members re substance of litigation	1.10	\$600.00	\$660.00								
	12/14/2021	BU	Discussion with KAS re Sunrise 23(f) petition and opposition thereto	0.50	\$790.00	\$395.00			0.5	395				
	12/14/2021	KAS	Discussion with BU re Sunrise 23(f) petition and opposition thereto	0.50	\$795.00	\$397.50			0.5	395				
	12/14/2021	BU	View CH email re settlement update	0.20	\$600.00	\$120.00			0.2	120				
	12/14/2021	KAS	Email to CH re settlement update	0.20	\$795.00	\$159.00								
	12/14/2021	BU	Draft under seal filing papers and supporting declaration for 2 joint statements/mtc (lay witness depositions and further discovery)	9.80	\$600.00	\$5,880.00								
	12/15/2021	BU	Email to J. Gorman re status of class list	0.10	\$600.00	\$60.00								
	12/15/2021	BU	Emails with CH re draft postcard notice and compilation of class list, communication with class members and email to J. Gorman re same	1.00	\$600.00	\$600.00								
	12/16/2021	BU	Forward as filed happy camper declarations to JT	0.10	\$600.00	\$60.00								
	12/16/2021	KAS	Discussion with BU re trial prep team meeting tasks	0.40	\$795.00	\$318.00			0.4	318				
	12/16/2021	BU	Discussion with KAS re trial prep team meeting tasks	0.40	\$600.00	\$240.00			0.4	240				
	12/16/2021	BU	Phone call with CH re Sunrise's response to Ps' discovery motions	0.40	\$600.00	\$240.00								
	12/16/2021	BU	Emails to CH re possible 'sampling protocol' re production of assessment data in connection with mtc post-certification	0.50	\$600.00	\$300.00								
	12/16/2021	BU	Further edits to further discovery motion	4.60	\$600.00	\$2,760.00								
	12/16/2021	BU	Email to CH re background on requests for depositions/deposition notices before fact discovery cut off	0.70	\$790.00	\$553.00								
	12/16/2021	BU	Team GoToMeeting led by CH re trial prep	2.00	\$600.00	\$1,200.00					2	1,200.00		
	12/17/2021	BU	Further edits to draft 'further discovery' brief	5.10	\$600.00	\$3,060.00								
	12/17/2021	BU	Phone call with CH redraft 'further discovery' brief	0.40	\$600.00	\$240.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
		Draft insert re joint statement on lay witness depositions concerning service of depo notice(s) before discovery cut-off and emails with CH re same	2.10	\$600.00		\$1,260.00								
12/17/2021	BU	GoToMeeting - trial prep follow up	1.00	\$600.00		\$600.00					1	600		
12/17/2021	BU	Review CH edits to joint statement on lay witnesses	0.90	\$600.00		\$540.00								
12/17/2021	BU	forward operative draft of statement/briefing on class notice to CH	0.20	\$600.00		\$120.00								
12/17/2021	BU	Email to J. Gorman re status of class notice authorities Sunrise is relying on, class list, and communication with class members	0.40	\$600.00		\$240.00								
12/18/2021	BU	Further edits to lay witness depo motion and draft supporting BU declaration	4.50	\$600.00		\$2,700.00								
12/18/2021	BU	Further edits to 'further discovery' joint statement/motion and draft supporting BU declaration	5.70	\$600.00		\$3,420.00								
12/19/2021	BU	Review CH edits to joint statement on class notice	1.30	\$600.00		\$780.00								
12/19/2021	BU	Further edits to 'further discovery' joint statement/discovery motion including targeted Relativity searches for record cites (re TCB/MedSummit related documents)	5.40	\$600.00		\$3,240.00								
12/20/2021	BU	Finalize and prepare for filing under seal, including redactions: joint statement/mtc on (1) lay witness depositions, and (2) further discovery; (3) supporting BU declarations; (4) statement on class notice; and (5) filing under seal papers	12.00	\$600.00		\$7,200.00								
12/20/2021	BU	Telephone call and emails with J. Gorman re class list/notice	1.50	\$600.00		\$900.00								
12/20/2021	BU	Emails with J. Green (CPT Group) re required info for address checks	0.30	\$600.00		\$180.00								
12/21/2021	BU	Upload MTC documents to Judicate West portal	0.50	\$600.00		\$300.00			0.5	300				
12/28/2021	BU	Review proposed under seal filing per 12/27 Order and email with L. Valdez re same	0.50	\$600.00		\$300.00								
12/28/2021	BU	Review unredacted papers for under seal filing	0.80	\$600.00		\$480.00			0.8	480				
12/28/2021	KAS	Review Stipulation and P&A on MTC Further Discovery	1.00	\$795.00		\$795.00								
1/6/2022	BU	Review tentative ruling on joint statements/mtc (further discovery, lay witness depositions)	6.20	\$600.00		\$3,720.00								
1/6/2022	BU	Email summary to CH and follow up correspondence re same, including review of prior M&C correspondence re custom scripts for assessment data production, notes from conference with PointClickCare rep.	4.70	\$600.00		\$2,820.00								
1/6/2022	BU	Discuss discovery tentative rulings with KAS	0.70	\$790.00		\$553.00								
1/6/2022	BU	Emails with CH re MedSummit docs not produced by Sunrise	0.40	\$600.00		\$240.00								
1/6/2022	BU	Targeted Relativity searches re same - re MTC further discovery	1.10	\$600.00		\$660.00								
1/6/2022	BU	Phone call with DM re granting class certification and next steps	0.30	\$600.00		\$180.00								
1/6/2022	KAS	Discuss discovery tentative rulings with BU	0.70	\$925.00		\$647.50								
1/7/2022	BU	Zoom discovery hearing with Discovery Master Guilford (CH, BU; Maryott, Gorman), re motions to compel on lay witness depositions and for 'further discovery'	1.50	\$600.00		\$900.00								
1/7/2022	BU	Email summary of discovery hearing before Discovery Master Guilford to team	0.70	\$600.00		\$420.00								
1/10/2022	BU	Discovery M&C prep; review CH notes re same	1.50	\$600.00		\$900.00								
1/11/2022	BU	Phone call with CH re discovery M&C (strategy/status)	1.30	\$600.00		\$780.00								
1/11/2022	BU	Draft joint discovery statement on tentative ruling	6.50	\$600.00		\$3,900.00								
1/11/2022	BU	Email J. Gorman re class list and M&C schedule	0.20	\$600.00		\$120.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	1/12/2022	KAS	Review Order re Proposed Form and Manner of Notice to the Class	0.50		\$925.00								
	1/12/2022	BU	Discovery M&C with J. Gorman re tentative ruling (discovery meet	1.50		\$600.00								
	1/12/2022	BU	and confer with Sunrise counsel)											
	1/12/2022	BU	Email to CH, GW re discovery meet and confer and class member	0.40		\$790.00								
	1/12/2022	BU	resident files	1.50		\$600.00					1.5		900	
	1/12/2022	BU	Trial-prep GoToMeeting (CH, JT, GW)											
	1/12/2022	BU	Email summary and related correspondence to CH re discovery M&C	1.30		\$600.00								
	1/12/2022	BU	Conversation with KAS rediscovery M&C	0.30		\$600.00								
	1/12/2022	BU	Compile and forward to J. Gorman proposed search terms for CEO	0.80		\$790.00								
	1/12/2022	BU	correspondence document request	1.40		\$600.00								
	1/12/2022	BU	Prepare for discovery M&C	0.40		\$925.00								
	1/12/2022	KAS	Discussion with BU re discovery meet and confer	0.50		\$600.00								
	1/12/2022	BU	Review order on class notice	0.40		\$925.00								
	1/12/2022	KAS	Email to BU re finding witnesses	0.30		\$600.00								
	1/13/2022	BU	Email to CH re Protective Order and resident files	0.30		\$600.00								
	1/13/2022	BU	Phone call with CH re class member resident files / class notice /											
	1/13/2022	BU	discovery brief-joint statement	0.30		\$600.00								
	1/13/2022	BU	Edits to joint statement on tentative ruling re outstanding 2	6.10		\$600.00								\$3,660.00
	1/13/2022	BU	outstanding discovery motions											
	1/13/2022	BU	Emails and phone calls with CH re joint statement on tentative ruling	0.70		\$600.00								\$420.00
	1/13/2022	BU	re outstanding 2 outstanding discovery motions											
	1/13/2022	BU	Emails with J. Gorman re joint statement on tentative ruling re	0.40		\$600.00								\$240.00
	1/13/2022	BU	outstanding 2 outstanding discovery motions											
	1/13/2022	BU	Review SW correspondence re Sunrise internal complaint system	0.70		\$600.00								\$420.00
	1/13/2022	BU	(and clawed-back documents re same) and further emails with S.											
	1/13/2022	BU	Warren re same	0.60		\$600.00								\$360.00
	1/13/2022	BU	Notes/prep for follow up M&C re 1/6 tentative ruling and phone calls	0.40		\$600.00								\$240.00
	1/13/2022	BU	with J. Gorman re same											
	1/13/2022	BU	Summary email to CH re Gorman calls											
	1/14/2022	BU	Further emails and phone calls with J. Gorman re timing of filing of	1.00		\$790.00								\$790.00
	1/14/2022	BU	joint status report on discovery with J. Guilford (discovery meet and											
	1/14/2022	BU	confer with Sunrise counsel)	0.30		\$790.00								\$237.00
	1/14/2022	BU	Discussion with CH re joint status report on discovery with J. Guilford	1.50		\$790.00								\$1,185.00
	1/14/2022	BU	Review Sunrise's draft joint status report following discovery R&R	2.00		\$790.00								\$1,580.00
	1/14/2022	BU	Discuss with CH and edit and email to J. Gorman re same											
	1/17/2022	BU	Email correspondence with J. Gorman re defendant's portion of joint	0.20		\$600.00								\$120.00
	1/18/2022	BU	discovery statement	4.10		\$600.00								\$2,460.00
	1/18/2022	BU	Edits to joint discovery statement	0.70		\$600.00								\$420.00
	1/18/2022	BU	Phone calls with CH, J. Gorman re same											
	1/18/2022	BU	Forward to CH draft long and short form class notices, Order, and	0.50		\$600.00								\$300.00
	1/18/2022	BU	[proposed] Order re form/dissemination of class notice for											
	1/18/2022	BU	communication with CPT Group											
	1/19/2022	BU	Email correspondence and phone calls with J. Gorman re case	2.80		\$600.00								\$1,680.00
	1/19/2022	BU	schedule / M&C efforts on assessment data and emails with CH re											
	1/19/2022	BU	same											

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	1/31/2022	BU	Emails/phone call with MJ re motion for leave to take Slichta depo, class notice issues	0.60	\$600.00									
	2/1/2022	KAS	Review Defendants' MSJ and Call with BU	1.50	\$925.00									
	2/1/2022	BU	Conference call with MJ, CH, GW re motion for leave to take Slichta depo	0.80	\$600.00									
	2/1/2022	BU	Edits to brief re same, BU declaration re same	2.50	\$600.00									
	2/2/2022	BU	Review Sunrise's MSJ, notes re same	1.80	\$600.00									
	2/2/2022	BU	Email to J. Gorman re under seal pleadings	0.20	\$600.00									
	2/2/2022	KAS	Review Motion to Amend Scheduling Order	0.30	\$925.00									
	2/3/2022	BU	Edits to email to Discovery Master Guilford re MSJ arguments that impact discovery rulings and send to Guilford	0.50	\$600.00									
	2/3/2022	BU	Draft stipulation and [proposed] order adding S. Warren and Trails Law Group to list of class counsel and forward same to J. Gorman	1.50	\$600.00									
	2/3/2022	BU	Trial prep project - depo summaries (Lacey)	2.40	\$600.00				2.4	1440				
	2/4/2022	BU	Further edits to draft stipulation / [proposed] order adding S. Warren/Trails Law Group to list of class counsel and emails with J. Gorman re same	1.00	\$600.00									
	2/4/2022	BU	Emails with SW re CV	0.10	\$600.00									
	2/7/2022	KAS	Review Order Granting Stipulation to Amend Scheduling Order	0.20	\$925.00									
	2/8/2022	BU	Phone call with GK re legal research re tolling on nondisclosure claims under CLRA/UCL	0.60	\$600.00									
	2/9/2022	BU	Email to defense re joint discovery statement on class list (attaching same), possible further M&C, Warren stip	0.50	\$600.00									
	2/10/2022	KAS	Review Joint Statement Regarding Compilation of Class List	0.50	\$925.00									
	2/10/2022	BU	Team call re status/strategy	0.70	\$600.00									
	2/10/2022	BU	Finalize joint discovery statement on class list, work with L. Valdez to file amd emails with CH, J. Gorman re same	2.70	\$600.00									
	2/10/2022	KAS	Team call re status, strategy, update	0.50	\$925.00									
	2/14/2022	BU	Phone call with CH - plan for adding S. Warren to list of Class Counsel and strategy for including language re Communications with class members as part of class notice, Discovery Master Guilford	0.40	\$600.00									
	2/15/2022	KAS	Email to GK re invoice attached	0.20	\$925.00				0.2	185				
	2/15/2022	BU	Email to J. Gorman re outstanding discovery issues (Warren stipulation; Sunrise communications with class members about subject matter of litigation during notice period)	0.50	\$600.00				0.2	120				
	2/15/2022	BU	Draft joint statement asking Court to add SW to list of class counsel in lieu of stipulation	0.50	\$600.00									
	2/15/2022	BU	Email to Discovery Master Guilford re update on status of case post submission of stipulated scheduling order and impact on outstanding discovery motions	0.50	\$600.00									
	2/16/2022	BU	Email correspondence with J. Gorman re Warren stip vs joint statement and further discussion/clarification re Plaintiffs' request that Sunrise not communicate with class members about the pending litigation in connection with class notice process	0.50	\$600.00									
	2/17/2022	BU	Email to GW re legal authority to prevent Sunrise from communicating with class members about subject matter of litigation (when do class members become clients?)	0.30	\$600.00									

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	2/17/2022	BU	Legal research re relationship of certified class to class counsel	3.90	\$600.00	\$2,340.00								
	2/17/2022	BU	Email to H. Adams re filing Discovery Master Guilford's Report and Recommendation with the Court	0.20	\$600.00	\$120.00			0.2	120				
	2/17/2022	BU	Draft Notice of Errata re Class Counsel referenced in class certification order	3.10	\$600.00	\$1,860.00								
	2/17/2022	BU	Email correspondence with J. Gorman, MJ re errata (in lieu of joint statement or stipulation)	0.40	\$600.00	\$240.00								
	2/18/2022	BU	Review Discovery Master Guilford's 1/17 Report and Recommendation, summary and important dates and email to CH re same	1.70	\$600.00	\$1,020.00								
	2/18/2022	BU	Emails with L. Valdez re filing errata and Discovery Master's Report and Recommendation and work with L. Valdez to complete same	1.40	\$600.00	\$840.00			1.4	840				
	2/18/2022	BU	Email to DM re status of under seal order granting class certification	0.20	\$600.00	\$120.00								
	2/22/2022	KAS	Phone call with BU re Discovery Master's Report and Recommendation, next steps	0.50	\$925.00	\$462.50								
	2/22/2022	BU	Phone call with KAS re Discovery Master's Report and Recommendation, next steps	0.50	\$790.00	\$395.00								
	2/22/2022	BU	Review letter from defense re MOD file production and email to DM re same	0.40	\$600.00	\$240.00								
	2/22/2022	BU	Phone call with CH re Discovery Master Guilford's Report and Recommendation, errata, strategy going forward	0.30	\$600.00	\$180.00								
	2/22/2022	BU	Review order appointing Discovery Master for timing on appeal of R&R and email to CH, GW re same	0.20	\$600.00	\$120.00								
	2/23/2022	BU	Review Report and Recommendation re clarification on production of aggregate billing data issue	0.80	\$600.00	\$480.00								
	2/23/2022	BU	Review Brookdale correspondence and MTC letter briefs, Order re production of MOD files for same/similar issue	0.50	\$600.00	\$300.00								
	2/23/2022	BU	Review Report and Recommendation and notes re same to prepare for call with CH re appeal on class member resident file issue	0.50	\$600.00	\$300.00								
	2/23/2022	BU	Phone call with CH re possible appeal on class member resident file issue	0.40	\$600.00	\$240.00								
	2/24/2022	BU	Draft M&C letter re MOD file production and items ordered to meet and confer about in last Report and Recommendation (pendant data, Winkle emails)	1.50	\$600.00	\$900.00								
	2/24/2022	BU	Further review of final Report & Recommendation, notes re aggregate billing / collections data and phone call with CH re same	0.70	\$600.00	\$420.00								
	2/25/2022	BU	Review GW memo (and cases) re attorney-client relationship with absent class members	1.00	\$600.00	\$600.00								
	2/25/2022	BU	Email to J. Gorman responding to 2/22 letter re MOD files	0.40	\$600.00	\$240.00								
	3/1/2022	BU	Emails to defense re MOD file production issue and prohibition on certain class member communications and emails with CH re same	1.30	\$600.00	\$780.00								
	3/3/2022	BU	Emails with CH, DM re duty to supplement written discovery under Federal Rules	0.40	\$600.00	\$240.00								
	3/3/2022	BU	Review outstanding requests for applicability	0.60	\$600.00	\$360.00								
	3/4/2022	BU	email to L. Valdez re upcoming discovery dates	0.30	\$600.00	\$180.00			0.3	180				

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	3/8/2022	BU	Draft email to defense re further response on MOD file production issue - forward to CH, DM	0.50	\$600.00	\$300.00								
	3/10/2022	BU	Phone call with CH re outstanding discovery and next steps	0.40	\$600.00	\$240.00								
	3/10/2022	BU	Draft further M&C email on communications with class members and circulate to CH, GW	0.60	\$600.00	\$360.00								
	3/10/2022	BU	Review Sunrise's proposed search terms re Winkle emails and edit for counter-proposal	0.80	\$600.00	\$480.00								
	3/10/2022	BU	Email to counsel re hit report and Ps' counter-proposal on search terms	0.20	\$600.00	\$120.00								
	3/10/2022	BU	Email to DM re Schroyer/MOD file issue and disclosures before deposition	0.30	\$600.00	\$180.00								
	3/10/2022	BU	Email to MY re happy camper contacts and follow up questions	0.20	\$600.00	\$120.00								
	3/10/2022	BU	Phone call with J. Pearigen, C. Jones, M. Maryott re search terms for Winkle email doc request (discovery meet and confer with Sunrise counsel)	0.30	\$600.00	\$180.00								
	3/10/2022	BU	Email to CH re status of outstanding discovery items, proposed strategy and discussion with KAS re same	0.80	\$600.00	\$480.00								
	3/10/2022	KAS	Discussion with BU re status of outstanding discovery items	0.40	\$925.00	\$370.00								
	3/10/2022	BU	Targeted Relativity searches re PSP data production	0.70	\$600.00	\$420.00								
	3/11/2022	BU	Emails with CH re draft 'communications with class members' email; send to defense	0.50	\$600.00	\$300.00								
	3/11/2022	BU	Emails with GK re happy camper declarations	0.30	\$600.00	\$180.00								
	3/14/2022	BU	Phone call with CH re MOD file issue and proposed response	0.20	\$600.00	\$120.00								
	3/21/2022	BU	Draft email to defense re M&C on production of MOD files and counter-proposal	0.50	\$600.00	\$300.00								
	3/21/2022	BU	Review defense counsel email re MOD files and send response	0.30	\$600.00	\$180.00								
	3/22/2022	BU	Review MY email re class list deficiencies and plan to remedy and emails to MY, CH re same	0.60	\$600.00	\$360.00								
	3/23/2022	BU	Review MY email re Seal Beach staffing issues	0.10	\$600.00	\$60.00								
	3/23/2022	BU	Draft response and forward to CH email with defense re communications with class members	0.30	\$600.00	\$180.00								
	3/23/2022	BU	Review defense email re MOD file counter-proposal	0.20	\$600.00	\$120.00								
	3/24/2022	BU	Email to defense accepting counter-proposal re MOD file production and email to DM re same	0.40	\$600.00	\$240.00								
	3/28/2022	BU	Email to MY re class list / address info issue	0.20	\$600.00	\$120.00								
	3/28/2022	BU	Review sealing Order and Order on compilation of class list and email to CH re latter	0.40	\$600.00	\$240.00								
	3/28/2022	BU	Email to L. Valdez re sealing order and next steps to accomplish Review Order on dissemination of class notice and email to CH, J.	0.20	\$600.00	\$120.00								
	3/28/2022	BU	Green (CPT Group) re same	0.50	\$600.00	\$300.00								
	3/28/2022	BU	Finalize class notice per Order	1.00	\$600.00	\$600.00								
	3/28/2022	BU	Redactions per sealing Order	3.70	\$600.00	\$2,220.00			3.7	2220				
	3/28/2022	BU	Discovery production timeline and email to CH	0.70	\$600.00	\$420.00								
	3/28/2022	KAS	Phone call with BU re order on dissemination of class notice, next steps	0.40	\$925.00	\$370.00								
	3/28/2022	BU	Phone call with KAS re order on dissemination of class notice, next steps	0.40	\$790.00	\$316.00								
	3/29/2022	BU	Draft email re class list deficiencies and forward to CH for review/comment	0.40	\$600.00	\$240.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	3/29/2022	BU	Further edits to email re class list deficiencies and emails with MY re same	0.30	\$600.00									
	3/29/2022	BU	Emails with CPT Group re class list and Ps' counsel contact list	0.90	\$600.00									
	3/29/2022	BU	Letter to counsel identifying issues with class list	0.40	\$790.00									
	3/30/2022	BU	Forward exemplar assessment data to JT, DM	0.20	\$600.00									
	3/30/2022	BU	Email to defense re missing info from exemplar assessment data	0.20	\$600.00									
	3/30/2022	BU	Emails with JT, DM re former employee witness interview, related discovery documents and requests	0.60	\$600.00									
	3/31/2022	BU	Draft email response re assessment data production and related fields	0.70	\$600.00									
	3/31/2022	BU	Review M&C correspondence from sample production and forward to CH, DM for comment	0.30	\$600.00									
	3/31/2022	BU	Email correspondence with CPT Group re status of final class notice	0.30	\$600.00									
	3/31/2022	BU	Phone call with CH re assessment data production / strategy	0.40	\$600.00									
	3/31/2022	BU	Edits to final class notice	0.30	\$600.00									
	3/31/2022	BU	Draft joint statement submitting final version per Order	0.40	\$600.00									
	3/31/2022	BU	Phone calls and emails with DM and JT re assessment data production / strategy	0.60	\$600.00									
	3/31/2022	BU	Further edits to responsive email re absence data	0.30	\$600.00									
	3/31/2022	BU	Draft transmittal to defense re final class notice	0.20	\$600.00									
	4/1/2022	BU	Email correspondence with CPT Group re status of final notice and Spanish-language version of same; review same	0.80	\$600.00									
	4/1/2022	BU	Draft/finalize joint statement submitting final class notice and forward to defense	1.70	\$600.00									\$1,020.00
	4/1/2022	KAS	Email to CH re Rule23(f) Petition Granted	0.20	\$925.00									\$185.00
	4/1/2022	BU	Emails to CH, JT re further revisions to email to defense re missing absence data from exemplar assessment data and phone calls with CH, JT re same	1.30	\$600.00									\$780.00
	4/2/2022	KAS	Email to CH re updated proposed response on case stay	0.20	\$925.00									\$185.00
	4/5/2022	BU	Phone call with CH re stay, discovery - strategy	0.30	\$600.00									\$180.00
	4/5/2022	BU	Review CH/J. Schwartz emails re stay, discovery	0.20	\$600.00									\$120.00
	4/5/2022	BU	Draft email to defense re status of production of unprotected MOD files in light of stay/discovery negotiations	0.80	\$600.00									\$480.00
	4/5/2022	BU	Review notes and draft email to CH re outstanding discovery and potential areas not impacted by proposed stay	0.70	\$600.00									\$420.00
	4/5/2022	BU	Compile papers to file under seal and perform necessary redactions	1.40	\$600.00									\$840.00
	4/6/2022	BU	Phone call with CH, JT re stay/discovery and proposed counter-proposal	0.70	\$600.00									\$420.00
	4/6/2022	BU	Further edits to under seal filing and emails with L. Valdez re same	1.10	\$600.00					1.1		660		\$660.00
	4/6/2022	BU	Discussion with KAS re appeal, Sunrise's request for stay and discovery proposals	0.60	\$600.00									\$360.00
	4/6/2022	BU	Email correspondence with CH, GW, DM re stay/discovery proposals	0.30	\$600.00									\$180.00
	4/6/2022	KAS	Discussion with BU re appeal, Sunrise's request for stay and discovery proposals	0.60	\$925.00									\$555.00

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	4/7/2022	BU	Opposition to ex parte application for stay, supporting BU declaration	9.70	\$600.00	\$5,820.00								
	4/7/2022	BU	Emails and phone calls with CH, L. Valdez Opposition to ex parte application for stay	0.70	\$600.00	\$420.00								
	4/8/2022	BU	Review Olean en banc opinion re class certification impact	2.00	\$600.00	\$1,200.00								
	4/8/2022	BU	Review MY email re class outreach status and email to MY re same	0.30	\$600.00	\$180.00								
	5/4/2022	KAS	Email to CH re appellate plan	0.30	\$925.00	\$277.50								
	5/31/2022	BU	Discussion with KAS re depo of former Operations employee and potential questions	0.30	\$600.00	\$180.00								
	5/31/2022	KAS	Discussion w/BU re depo of former Operations employee and potential questions	0.50	\$925.00	\$462.50								
	6/2/2022	KAS	Fwd GK email re Corbina Mancuso to BU	0.20	\$925.00	\$185.00								
	6/20/2022	BU	Review CH email re 5-year SOL	0.30	\$600.00	\$180.00								
	6/22/2022	BU	Memo re outstanding discovery pending appeal	1.50	\$600.00	\$900.00								
	6/24/2022	KAS	Email to K. Fish re former conact re potential relevant info for class case	0.20	\$925.00	\$185.00			0.2	185				
	7/18/2022	BU	Email to E. Ganz re case update	0.20	\$600.00	\$120.00								
	7/19/2022	BU	Email correspondence with GW re redactions to order granting class certification and current (unredacted) status	0.30	\$790.00	\$237.00								
	8/10/2022	BU	Email correspondence with A. Fearn re case status	0.30	\$790.00	\$237.00								
	9/6/2022	BU	Review J. Gorman email re under seal appellate filing	0.40	\$790.00	\$316.00								
	9/6/2022	BU	Review Order unsealing class cert order and email to CH re same	0.40	\$790.00	\$316.00								
	9/7/2022	BU	Review CH email re appellate under seal filing response	0.10	\$790.00	\$79.00								
	9/7/2022	BU	Draft email to Gorman re appellate under seal filing response	0.20	\$790.00	\$158.00								
	9/10/2022	KAS	Discussion with BU re opening brief	0.40	\$925.00	\$370.00			0.2	185				
	9/10/2022	BU	Discussion with KAS re opening brief	0.40	\$790.00	\$316.00			0.2	120				
	9/10/2022	BU	Read/review Sunrise's appellate filing	3.30	\$790.00	\$2,607.00								
	9/12/2022	BU	Discussion with KAS re Sunrise's opening appellate brief - main arguments	0.50	\$790.00	\$395.00								
	9/12/2022	BU	Discussion with BU re Sunrise's opening appellate brief - main arguments	0.50	\$790.00	\$395.00								
	9/12/2022	KAS	Discussion with BU re Sunrise's opening appellate brief - main arguments	0.50	\$925.00	\$462.50								
	9/12/2022	BU	Email correspondence with team re appellate filing	0.40	\$790.00	\$316.00								
	9/12/2022	BU	Review appellate procedural rules re timing on motions	0.50	\$790.00	\$395.00								
	9/12/2022	BU	Review Sunrise's appellate motion to seal	0.60	\$790.00	\$474.00								
	9/12/2022	BU	Review appellants opening brief and notes re same	6.00	\$790.00	\$4,740.00								
	9/12/2022	BU	Compile amended class cert briefing and supporting declarations as filed in district court and circulate to appellate team	0.50	\$790.00	\$395.00								
	9/13/2022	BU	Review appellants opening brief and notes re same	2.00	\$790.00	\$1,580.00								
	9/13/2022	BU	Review draft opposition to motion to seal and index of proposed under seal excerpts to oppose	3.00	\$790.00	\$2,370.00								
	9/13/2022	BU	Team call re appellate strategy and opposition to motion to seal	1.00	\$790.00	\$790.00								
	9/13/2022	BU	Edits to opposition to motion to seal	3.10	\$790.00	\$2,449.00								
	9/13/2022	BU	Draft/edits to opposition to motion to seal	1.50	\$790.00	\$1,185.00								
	9/14/2022	BU	Draft/edits to opposition to motion to seal and forward to CH for review, comment	5.20	\$790.00	\$4,108.00								
	9/14/2022	BU	Review CH edits and email re motion to seal	0.30	\$790.00	\$237.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg	Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	
			Review AOB (Appellants' Opening Brief) list of record/legal inaccuracies	1.30	\$790.00	\$1,027.00							
	9/14/2022	BU	Gather expert / class cert related briefing and forward to GW	0.80	\$790.00	\$632.00							
	9/15/2022	BU	Finalize opposition to motion to seal	2.00	\$790.00	\$1,580.00							
	9/15/2022	BU	Review GW, MJ emails re standing analysis in class cert order	0.40	\$790.00	\$316.00							
	9/15/2022	BU	Review standing cases/concrete injury class cert order/authorities compared to Sunrise AOB	3.70	\$790.00	\$2,923.00							
	9/15/2022	BU	Email correspondence to clients re disclosure of info produced in discovery	0.50	\$790.00	\$395.00							
	9/15/2022	BU	Email to MY re correspondence to clients re disclosure of info produced in discovery	0.10	\$790.00	\$79.00							
	9/15/2022	BU	Emails with CH re correspondence to clients re disclosure of info produced in discovery	0.10	\$790.00	\$79.00							
	9/15/2022	BU	Phone call with A. Fearn re correspondence to clients re disclosure of info produced in discovery	0.30	\$790.00	\$237.00							
	9/15/2022	BU	Review file and emails with GW re Sunrises efforts to depose Schroyer upon submission of reply declaration	0.80	\$790.00	\$632.00							
	9/15/2022	BU	Discussion with KAS re email correspondence to clients re disclosure of information produced in discovery	0.50	\$790.00	\$395.00							
	9/15/2022	KAS	Discussion with BU re email correspondence to clients re disclosure of information produced in discovery	0.50	\$925.00	\$462.50							
	9/16/2022	KAS	Discussion with BU re Elise Ganz and authorization to disclose personal information	0.40	\$925.00	\$370.00							
	9/16/2022	BU	Call with putative class member - background fact intake / investigation	0.50	\$790.00	\$395.00							
	9/16/2022	BU	Review Chamber of Commerce amicus brief	0.80	\$790.00	\$632.00							
	9/16/2022	BU	Phone call with Elise Ganz re appeal, confidential info, update	0.50	\$790.00	\$395.00							
	9/16/2022	BU	Email to GW, CH re client/declarant authorization on personal/confidential info	0.10	\$790.00	\$79.00							
	9/16/2022	BU	Filing opposition to motion to seal	0.20	\$790.00	\$158.00							
	9/16/2022	BU	Review/analyze damages cases cited in AOB	4.60	\$790.00	\$3,634.00							
	9/16/2022	BU	Discussion with KAS re Elise Ganz and authorization to disclose personal information	0.40	\$790.00	\$316.00							
	9/19/2022	BU	Review hearing transcripts re discovery/expert issues vis a vis Schroyer and concierge/risk of harm	3.70	\$790.00	\$2,923.00							
	9/21/2022	BU	Review petition for re-hearing in Bowman re predominance	1.30	\$790.00	\$1,027.00							
	9/21/2022	BU	Read/review CALA, Argentum, ASHA amicus brief	1.00	\$790.00	\$790.00							
	9/23/2022	BU	Phone call with GW re appellate opposition brief, unhappy camper declarations, Flores expert opinions; compile info re same and forward to GW	1.50	\$790.00	\$1,185.00							
	9/23/2022	KAS	Call w/C. Lee, texts, emails	0.20	\$925.00	\$185.00							
	9/26/2022	BU	Supplemental appellate record Ganz/Fearn testimony re staffing	5.50	\$790.00	\$4,345.00							
	9/27/2022	KAS	Discussion with BU re resident staffing expectations, declarant testimony re same	0.70	\$925.00	\$647.50							
	9/27/2022	BU	Update named plaintiff staffing expectations testimony with testimony from four declarants who were deposed by Sunrise and forward to GW	2.20	\$790.00	\$1,738.00							
	9/27/2022	BU	Supplemental appellate record Ganz/Fearn testimony re staffing	3.20	\$790.00	\$2,528.00							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs	Falkenberg	Travel	
				Worked			General	Fees				
Fees							Hrs	Fees	Hrs	Fees	Hrs	Fees
	9/27/2022 BU	Phone call with GW re declarants iso class cert	0.40	\$790.00		\$316.00						
	9/27/2022 BU	Discussion with KAS re resident staffing expectations, declarant testimony re same	0.60	\$790.00		\$474.00						
	9/28/2022 BU	Review emails/correspondence/file re other ALF chain and whether Aegis task times are specifically part of the record, per GW	1.10	\$790.00		\$869.00						
	9/28/2022 BU	Review declarations submitted iso class cert; excerpts for GW re staffing/deficiencies	6.20	\$790.00		\$4,898.00						
	9/29/2022 BU	Review correspondence/file and memo to GW re use of Aegis task times in Sunrise litigation	1.70	\$790.00		\$1,343.00						
	10/4/2022 BU	Review MJ chart re Sunrises record citations and email re same	1.00	\$790.00		\$790.00						
	10/6/2022 BU	AOB citations project	7.40	\$790.00		\$5,846.00						
	10/9/2022 BU	Analysis of facts and record evidence cited by Sunrise in AOB	6.30	\$790.00		\$4,977.00						
	10/10/2022 BU	Analysis of facts and record evidence cited by Sunrise in AOB	3.50	\$790.00		\$2,765.00						
	10/10/2022 BU	Review draft appellants brief, edits/comments re same	4.70	\$790.00		\$3,713.00						
	10/11/2022 BU	Analysis of facts and record evidence cited by Sunrise in AOB	4.50	\$790.00		\$3,555.00						
	10/11/2022 BU	Zoom call with CH, GW, MJ, MY, JU re appellate brief and strategy, to dos	1.70	\$790.00		\$1,343.00						
	10/11/2022 BU	Draft insert rebuttal to no evidence of understaffing	2.00	\$790.00		\$1,580.00						
	10/11/2022 KAS	Discussion with BU re team call on appellate brief/strategy	0.60	\$925.00		\$555.00			0.6	555		
	10/11/2022 BU	Discussion with KAS re team call on appellate brief/strategy	0.60	\$790.00		\$474.00			0.6	474		
	10/12/2022 BU	Develop appellees excerpts of record review Musoke declaration and deposition re DSS citations / Flores / injury-bad outcomes	7.20	\$790.00		\$5,688.00						
	10/13/2022 BU	Develop appellees excerpts of record happy camper discovery / class list / Musoke DSS citations	5.80	\$790.00		\$4,582.00						
	10/14/2022 BU	Phone call with MY re appellate record project	0.50	\$790.00		\$395.00						
	10/14/2022 BU	Appellate record project	6.40	\$790.00		\$5,056.00						
	10/17/2022 BU	Appellate record project review Ganz, Fearn, declarant, Flores, Kennedy depos re record testimony	6.20	\$790.00		\$4,898.00						
	10/17/2022 KAS	Call w/C. Lee, texts, emails	0.20	\$925.00		\$185.00						
	10/18/2022 BU	Appellate record project Musoke; Kennedy part 2 re timing of damages calculation	3.90	\$790.00		\$3,081.00						
	10/18/2022 BU	GW project re Kennedy and Sunrise's argument re classwide damages for all putative class members	5.30	\$790.00		\$4,187.00						
	10/19/2022 BU	Appellate brief record cites for happy/unhappy camper testimony (declaration and deposition) re expectations, risks to avoid, evidence of understaffing; Kennedy damages questions; Flores task time questions	8.60	\$790.00		\$6,794.00						
	10/20/2022 BU	Emails/phone calls with JT re Flores Table 3 task times and emails with GW re same	2.60	\$790.00		\$2,054.00						
	10/21/2022 BU	Email to GW re Flores testimony re % of residents requiring ADL assistance	0.70	\$790.00		\$553.00						
	10/23/2022 BU	Draft appellate brief inserts - happy camper discovery; understaffing evidence, staffing and consumer expectations	7.70	\$790.00		\$6,083.00						
	10/24/2022 BU	Draft appellate brief inserts - happy camper discovery; understaffing evidence, staffing and consumer expectations and forward same to CH	8.90	\$790.00		\$7,031.00						
	10/28/2022 BU	Email to MY, CH re unhappy camper staffing expectations and declaration language re same	0.40	\$790.00		\$316.00						

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	10/28/2022	KAS	Email to BU re Sunrise class cert appeal - status/update	0.40	\$925.00	\$370.00								
	10/28/2022	BU	Discussion with KAS re consumer staffing expectations	0.50	\$790.00	\$395.00								
	10/28/2022	BU	Email to KAS re appellate update	0.30	\$790.00	\$237.00								
	11/2/2022	BU	Conference call with CH, P. Kennedy, L. Pettite re damages methodology	1.00	\$790.00	\$790.00								
	11/3/2022	BU	Email to CH, GW re number of happy camper declarants who are class members vs non-class members	0.30	\$790.00	\$237.00								
	11/3/2022	BU	Draft language for appellate brief re number of happy camper declarants who are class members vs non-class members	1.50	\$790.00	\$1,185.00								
	11/9/2022	BU	Review operative draft of appellate brief and notes re same in anticipation of afternoon team call	3.50	\$790.00	\$2,765.00								
	11/9/2022	KAS	Discussion with BU re team call - strategy/update	0.50	\$925.00	\$462.50			0.5	462.5				
	11/9/2022	BU	Discussion with KAS re team call - strategy/update	0.50	\$790.00	\$385.00			0.5	395				
	11/9/2022	BU	Prepare redactions to appellate materials	3.40	\$790.00	\$2,686.00			3.4	2686				
	11/9/2022	BU	Team call - appellate strategy, status	1.00	\$790.00	\$790.00					0.1		79	
	11/10/2022	BU	Enter citations, edits to appellate brief	8.30	\$790.00	\$6,557.00								
	11/11/2022	BU	Review amici briefs in advance of amici call, notes re same	1.50	\$790.00	\$1,185.00								
	11/11/2022	BU	Enter/check citations in appellate brief	5.10	\$790.00	\$4,029.00								
	11/11/2022	BU	Discussion with KAS re conference call among Ps' counsel, amici, re argument strategy	0.50	\$790.00	\$395.00			0.5	395				
	11/11/2022	KAS	Discussion with BU re conference call among Ps' counsel, amici, re argument strategy	0.50	\$925.00	\$462.50			0.5	462.5				
	11/11/2022	BU	Conference call among Ps' counsel, amici.	1.00	\$790.00	\$790.00								
	11/11/2022	BU	Conference call with CH, GW re appellate brief.	0.60	\$790.00	\$474.00								
	11/14/2022	BU	Compile citation index with crossover for appellate excerpts and district court docket.	8.60	\$790.00	\$6,794.00								
	11/15/2022	BU	Compile Musoke depo excerpts and response insert for appellate brief and forward to CH.	3.80	\$790.00	\$3,002.00								
	11/15/2022	BU	Redline edits to answering brief and forward to CH	3.20	\$790.00	\$2,528.00								
	11/16/2022	BU	Record cites for appellate brief/record	7.80	\$790.00	\$6,162.00								
	11/16/2022	BU	Legal research re evidentiary burden to rebut classwide inference of reliance	2.30	\$790.00	\$1,817.00								
	11/17/2022	BU	Legal research re evidentiary burden to rebut classwide inference of reliance and email to CH re same	1.10	\$790.00	\$869.00								
	11/18/2022	KAS	Call w/C. Lee, texts, emails	0.50	\$925.00	\$462.50								
	11/21/2022	BU	(Appeal) legal research re inference of reliance	3.20	\$790.00	\$2,528.00								
	11/22/2022	KAS	Call w/C. Lee, texts, emails	0.60	\$925.00	\$555.00								
	11/22/2022	BU	Legal research re acceptable damages model at class certification	5.20	\$790.00	\$4,108.00								
	11/30/2022	KAS	Email to BU status	0.40	\$925.00	\$370.00			0.4	370				
	12/1/2022	BU	Zoom with P. Kennedy, L. Pettite, CH, GW re damages model and notes re same, circulate	1.00	\$790.00	\$790.00								
	12/1/2022	BU	Review Kennedy depo re testimony on timing question; review notes/file for discussion of same.	6.10	\$790.00	\$4,819.00								
	12/2/2022	BU	Email to CH, GW re Kennedy/timing issue	1.80	\$790.00	\$1,422.00								
	12/9/2022	KAS	Emails to CH re C. Lee request for demand on sunrise and brookdale	0.30	\$925.00	\$277.50								
	12/9/2022	BU	Conference call among Ps' counsel and amici (AAPR, ombudsman) re appeal	1.00	\$790.00	\$790.00								
	12/19/2022	BU	Amicus Zoom	1.00	\$790.00	\$790.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General							
							Hrs							
	12/19/2022	BU	Review latest draft of appellate brief and notes edits re same	6.50	\$790.00	\$5,135.00								
	12/20/2022	BU	Address GW comments in draft brief	2.70	\$790.00	\$2,133.00								
	12/20/2022	BU	Review Evenflo for potential rebuttals to defense arguments re affirmative representations	4.50	\$790.00	\$3,555.00								
	12/21/2022	BU	Address -GW appellate brief follow up questions	5.30	\$790.00	\$4,187.00								
	12/21/2022	BU	Email to MJ re number of non-class member happy campers	0.60	\$790.00	\$474.00								
	12/21/2022	BU	Email to GW re class member count and support therefor	0.70	\$790.00	\$553.00								
	12/21/2022	BU	Email to GW re happy camper declarations, evidentiary objections re same	0.40	\$790.00	\$316.00								
	12/22/2022	BU	Phone call with CH re appellate brief, record	0.50	\$790.00	\$395.00								
	12/22/2022	BU	Email to CH re impossible position document insert and GW comments on draft	0.50	\$790.00	\$395.00								
	12/22/2022	BU	Review newest draft brief, edits / citations re same	7.30	\$790.00	\$5,767.00								
	12/27/2022	BU	Review latest draft brief, edits including citations	7.70	\$790.00	\$6,083.00								
	12/30/2022	BU	Review/edits to M. Olivier's draft brief	6.50	\$790.00	\$5,135.00								
	1/3/2023	BU	Supplemental excerpts of record (compile / edit)	5.80	\$790.00	\$4,582.00								
	1/3/2023	BU	Email to J. Bybee re happy camper discovery	0.50	\$790.00	\$395.00								
	1/4/2023	BU	Supplemental excerpts of record (compile)	3.50	\$790.00	\$2,765.00								
	1/4/2023	BU	Review/edit latest draft of appellate brief	2.50	\$790.00	\$1,975.00								
	1/4/2023	BU	Review residency agreement and email to GW re service plan language	0.60	\$790.00	\$474.00								
	1/4/2023	KAS	Discussion with BU re team call on appellate brief (strategy/updates)	0.40	\$925.00	\$370.00			0.4	370				
	1/4/2023	BU	Discussion with KAS re team call on appellate brief (strategy/updates)	0.40	\$790.00	\$316.00			0.4	316				
	1/4/2023	BU	Appellate brief call with team - strategy, update, assignments	1.20	\$790.00	\$948.00					0.2	158		
	1/5/2023	BU	Legal research re admissibility of records and phone call with CH re same	3.40	\$790.00	\$2,686.00								
	1/5/2023	BU	Edits to draft appellate brief - citations, SER	5.50	\$790.00	\$4,345.00								
	1/5/2023	BU	Email to L. Valdez re SER and recrod / docket citations	0.70	\$790.00	\$553.00			0.7	553				
	1/6/2023	BU	Emails with L. Valdez re SER, timing, rules	0.30	\$790.00	\$237.00			0.3	237				
	1/6/2023	BU	Create links in brief to SER	1.70	\$790.00	\$1,343.00			1.7	1343				
	1/7/2023	BU	Review operative draft brief and edits/citations	6.00	\$790.00	\$4,740.00								
	1/9/2023	BU	Phone call with L. Valdez re SER	0.30	\$790.00	\$237.00			0.3	237				
	1/10/2023	BU	Edits to appellate brief - cites, SER	6.50	\$790.00	\$5,135.00								
	1/11/2023	BU	Compile SER and index	8.30	\$790.00	\$6,557.00								
	1/11/2023	BU	Review MO's draft of appellate brief	1.50	\$790.00	\$1,185.00								
	1/12/2023	BU	Email to DM re word count on brief	0.30	\$790.00	\$237.00								
	1/12/2023	BU	Review operative drafts / cite checks, edits	4.20	\$790.00	\$3,318.00								
	1/12/2023	BU	Appellate rules re filing under seal, motions	1.00	\$790.00	\$790.00			1	790				
	1/12/2023	BU	Legal research re Elise Ganz as successor in interest and relevance to appeal / motion for substitution and email to CH re same	4.00	\$790.00	\$3,160.00								
	1/13/2023	BU	Discussion with KAS re amici call re status/strategy	0.40	\$790.00	\$316.00								
	1/13/2023	BU	Amici call re status / strategy	1.00	\$790.00	\$790.00								
	1/13/2023	KAS	Discussion with BU re amici call re status/strategy	0.40	\$925.00	\$370.00								
	1/13/2023	BU	Edits/cites to appellate brief and SER	7.60	\$790.00	\$6,004.00								
	1/17/2023	BU	Email to Elise Ganz re successor in interest	0.40	\$790.00	\$316.00								
	1/17/2023	BU	Review record for CF (community fee) evidence	3.80	\$790.00	\$3,002.00								
	1/17/2023	BU	Record cite checks based on CH's latest draft	4.40	\$790.00	\$3,476.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs	Falkenberg	Travel
				Worked			General	Fees			
Fees											
1/17/2023	BU	Call with CH, L. Valdez re brief, citations	0.50	\$790.00	\$395.00						
		Further edits to answering appellate brief, complete SER cites and forward to CH, L. Valdez	5.40	\$790.00	\$4,266.00						
1/18/2023	BU										
1/19/2023	BU	Edits / citations to appellate brief and SER	9.20	\$790.00	\$7,268.00						
1/20/2023	BU	SER pdfs, index, etc, including call with L. Valdez re same	3.70	\$790.00	\$2,923.00						
1/20/2023	BU	Edits / citations to appellate brief and SER	5.90	\$790.00	\$4,661.00						
1/22/2023	BU	Edit SER for formatting problems	7.20	\$790.00	\$5,688.00			7.2	5688		
1/23/2023	BU	Compile SER - pdfs, index, bates label, redactions/under seal, etc.	8.70	\$790.00	\$6,873.00						
1/24/2023	BU	Call with staff re status/filing	0.60	\$790.00	\$474.00						
1/24/2023	BU	Review supporting amicus brief and edits	1.00	\$790.00	\$790.00						
1/24/2023	BU	Compile SER - pdfs, index, bates label, redactions/under seal versions	5.50	\$790.00	\$4,345.00						
		Corrected SER volumes 1-10; corresponding cite check and emails to JU re same	7.90	\$790.00	\$6,241.00			7.9	6241		
1/25/2023	BU	Review latest CH additions to brief and check cites and update volumes to SER	4.20	\$790.00	\$3,318.00						
1/26/2023	BU	Email to J. Gorman re proposal to inform Court of mediation/settlement status, including proposed language re same	1.30	\$790.00	\$1,027.00						
1/26/2023	BU	Motion to file under seal, review Circuit Rules, draft and send to GW	2.50	\$790.00	\$1,975.00						
1/27/2023	BU	Edit cover pages to SER to conform to Form 20	1.60	\$790.00	\$1,264.00			1.6	1234		
1/30/2023	BU	Review latest draft of AARP amicus brief	1.40	\$790.00	\$1,106.00						
1/30/2023	BU	Citation project for oral argument - appellate ER/SER cite comparison to district court record	5.50	\$790.00	\$4,345.00						
2/15/2023	BU	Email to CH re opposing Sunrise's appellate request to seal	0.40	\$790.00	\$316.00						
2/15/2023	BU	Review circuit rules and prior order re appellate request to seal	0.70	\$790.00	\$553.00						
		Phone call with CH re Sunrise's motion to seal SER and email to J. Gorman re same	0.50	\$790.00	\$395.00						
2/16/2023	BU	Phone call with KAS, CH, GW, re response to request to maintain documents under seal on appeal	0.50	\$790.00	\$395.00						
2/17/2023	BU	Communications with C. Lee re potential settlement	0.10	\$790.00	\$79.00						
		Phone call with CH, GW, BU re response to request to maintain under seal and communications with C. Lee	0.50	\$925.00	\$462.50						
2/17/2023	KAS										
2/17/2023	BU	Emails with CH re Sunrise sealing request	0.40	\$790.00	\$316.00						
		Phone call with CH re Sunrise sealing request and email to defense counsel re same	0.60	\$790.00	\$474.00						
2/17/2023	BU	Legal research re reconsideration of sealing order/order from commissioner	2.00	\$790.00	\$1,580.00						
2/20/2023	KAS	Texts w/C. Lee re Mediation	0.40	\$925.00	\$370.00						
		Edits to opp to motion to maintain under seal and emails with L. Valdez, GW re same	2.10	\$790.00	\$1,659.00						
2/21/2023	BU										
2/22/2023	BU	Emails with L. Valdez and GW re filing opposition	1.50	\$790.00	\$1,185.00			0.2			
2/22/2023	BU	Edits and finalize opposition re under seal filing	1.30	\$790.00	\$1,027.00						
3/8/2023	BU	Emails with CH re fee/cost info for all p firms to date	0.40	\$790.00	\$316.00						
3/14/2023	BU	Team conference call re potential settlement	0.50	\$790.00	\$395.00						
3/14/2023	KAS	Team conference call re potential settlement	0.50	\$925.00	\$462.50						
		Review Aegis/Oakmont deal sheets for other possible terms to include in Sunrise proposal and email to CH re same	1.00	\$790.00	\$790.00						
3/14/2023	BU										

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	3/14/2023	BU	Discussion with KAS re same possible settlement terms	0.30	\$790.00	\$237.00								
	3/14/2023	KAS	Discussion with BU re Aegis/Oakmont deal sheets for other possible terms to include in Sunrise proposal	0.50	\$925.00	\$462.50								
	3/16/2023	BU	Forward under seal/unredacted SER volumes to L. Valdez	0.40	\$790.00	\$316.00			0.4	316				
	3/16/2023	BU	Review Katie Van 9th Cir class cert decision and potential impact, if any, on appeal	0.80	\$790.00	\$632.00								
	3/20/2023	BU	Review reply brief, notes re same	4.20	\$790.00	\$3,318.00								
	3/20/2023	BU	Hearing prep - citation index (answering brief)	5.00	\$790.00	\$3,950.00								
	3/21/2023	BU	Oral argument citation project	5.00	\$790.00	\$3,950.00								
	3/21/2023	BU	Review Reply brief, notes re same	3.00	\$790.00	\$2,370.00								
	3/21/2023	BU	Email to CH, team re possible responses to hypotheticals in reply brief re Article III injury	0.80	\$790.00	\$632.00								
	3/21/2023	BU	Discussion with KAS re reply brief arguments on injury/standing	0.50	\$790.00	\$395.00								
	3/21/2023	KAS	Discussion with BU re reply brief arguments on injury/standing	0.50	\$925.00	\$462.50								
	3/22/2023	BU	Reply brief - Legal research re injury for standing vs damages in federal court	7.20	\$790.00	\$5,688.00								
	3/23/2023	BU	Reply brief - Record review re evidence of overpayment	7.70	\$790.00	\$6,083.00								
	3/27/2023	BU	Discussion with KAS re team call re appeal strategy	0.70	\$790.00	\$553.00								
	3/27/2023	KAS	Emails, texts, calls w/C. Lee re settlement, Mediation	1.20	\$925.00	\$1,110.00								
	3/27/2023	KAS	Discussion with BU re team call re appeal strategy	0.70	\$925.00	\$647.50								
	3/27/2023	KAS	Emails to CH re settlement proposal	0.30	\$925.00	\$277.50								
	3/27/2023	BU	Overpayment project - compile all evidence of overpayment	7.10	\$790.00	\$5,609.00								
	3/27/2023	BU	Team call with CH, GW, MJ - appeal strategy	1.00	\$790.00	\$790.00								
	3/28/2023	KAS	Email to BU re settlement proposal	0.20	\$925.00	\$185.00								
	3/28/2023	BU	Overpayment project (Sunrise staff and family declarations)	7.70	\$790.00	\$6,083.00								
	3/28/2023	BU	Legal research re inference of reliance/Rule 23 predominance	1.00	\$790.00	\$790.00								
	3/29/2023	BU	Overpayment project - [Villanueva, Apolinario, Kennedy (again), exhibits contained in ER/SER]	6.90	\$790.00	\$5,451.00								
	4/3/2023	BU	Overpayment project, record cites and forward same to CH	4.20	\$790.00	\$3,318.00								
	4/4/2023	BU	Phone call with CH re responsive letter re Brookdale class cert order	0.50	\$790.00	\$395.00			0.5	395				
	4/4/2023	BU	Draft same. 28(j)	4.10	\$790.00	\$3,239.00								
	4/6/2023	BU	Review CH draft of 28(j) letter	0.50	\$790.00	\$395.00								
	4/7/2023	BU	Review CH email re argument points on overpayment injury/Article III and additional tasks	0.70	\$790.00	\$553.00								
	4/7/2023	BU	Edits to 28(j) letter and forward to CH	0.40	\$790.00	\$316.00								
	4/10/2023	BU	Review CH email re further support for overpayment	1.00	\$790.00	\$790.00								
	4/13/2023	BU	Evidence of overpayment project - expectation that services delivered on reliable and consistent basis - review residency agreement and marketing materials (Relativity searches)	1.80	\$790.00	\$1,422.00								
	4/14/2023	BU	Further telephone call with daughter of putative class member - additional fact gathering	0.80	\$790.00	\$632.00			0.3	237				
	4/20/2023	BU	Hearing prep project - record research re expectation of reliable, constant care	2.80	\$790.00	\$2,212.00								
	4/21/2023	BU	Review record evidence re consistent/reliable delivery of services (oral argument prep)	3.20	\$790.00	\$2,528.00								
	4/22/2023	BU	Review record evidence re consistent/reliable delivery of services	3.90	\$790.00	\$3,081.00								
	4/24/2023	BU	Review record evidence re consistent/reliable delivery of services project	2.00	\$790.00	\$1,580.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	5/3/2023	BU	Review CH memo re Hinojos/Mazza rebuttal	1.00	\$790.00	\$790.00								
	5/5/2023	BU	email correspondence with A. Fearn re case update	0.20	\$790.00	\$158.00								
	5/8/2023	BU	Hearing prep - review AOB, Reply re classwide survey/conjoint analysis arguments	4.30	\$790.00	\$3,397.00								
	5/8/2023	BU	Review memo re expert value quantification issues and notes re same	3.00	\$790.00	\$2,370.00								
	5/10/2023	BU	Zoom - hearing prep, survey responses	1.00	\$790.00	\$790.00								
	5/16/2023	BU	Consumer expectations/overpayment fact/record research - oral argument prep	5.80	\$790.00	\$4,582.00								
	5/17/2023	BU	Consumer expectations/overpayment fact/record research and email spreadsheet and docs to CH	5.90	\$790.00	\$4,661.00								
	5/18/2023	BU	Check appellate record for inclusion of award applications	0.70	\$790.00	\$553.00			0.3	237				
	5/19/2023	BU	Confirm award doc re appellate record and email to CH re same	0.40	\$790.00	\$316.00			0.4	316				
	5/25/2023	BU	Review CH outline and prepare for moot	5.50	\$790.00	\$4,345.00								
	5/26/2023	KAS	Discussion with BU re moot court prep / 9th Cir oral argument	0.40	\$925.00	\$370.00			0.2	185				
	5/26/2023	BU	Discussion with KAS re moot court prep / 9th Cir oral argument	0.40	\$790.00	\$316.00			0.2	158				
	5/30/2023	BU	Review CH outline and summary materials	3.00	\$790.00	\$2,370.00								
	5/30/2023	BU	Draft questions for moot	2.00	\$790.00	\$1,580.00			1	790				
	5/30/2023	BU	Moot via zoom (CH, GW, MO)	1.50	\$790.00	\$1,185.00								
	5/31/2023	BU	Background research re summer camp hypothetical - oral argument prep	2.20	\$790.00	\$1,738.00								
	6/1/2023	BU	Legal research re authorities distinguishing Kwikset, Hinojos - oral argument prep	3.80	\$790.00	\$3,002.00			1	790				
	6/1/2023	BU	Summer camp hypo - background research re oral argument prep	1.60	\$790.00	\$1,264.00			0.5	395				
	6/2/2023	BU	Summer camp analogy memo	4.50	\$790.00	\$3,555.00			1.5	1185				
	6/5/2023	BU	Prep for 2d moot - Kwikset and other hypos	3.10	\$790.00	\$2,449.00			0.5	395				
	6/6/2023	BU	Appellate moot via zoom	1.00	\$790.00	\$790.00								
	6/6/2023	BU	Update KAS re today's oral argument moot session	0.40	\$790.00	\$316.00			0.1	79				
	6/6/2023	BU	Review declarations re % of assessment data in hand vs coming	1.00	\$790.00	\$790.00								
	6/12/2023	BU	Email to CH re support for Sunrise's maintenance of electronic assessments and determining % available in electronic format for class period	3.90	\$790.00	\$3,081.00			0.5	395				
	6/14/2023	BU	Appellate moot via zoom	1.20	\$790.00	\$948.00								
	6/15/2023	BU	Phone call with CH re appellate record; review file and send citation index	0.60	\$790.00	\$474.00								
	6/20/2023	BU	Emal to CH, GW re Kennedy testimony on use and timing of shortfall staffing data to damages methodology	0.70	\$790.00	\$553.00								
	6/20/2023	BU	Prepare for in-person moot with new questions re consumer expectations and materiality	2.30	\$790.00	\$1,817.00			1	790				
	6/20/2023	BU	Email to CH re under seal status of staffing formula in 9th Cir	0.30	\$790.00	\$237.00								
	6/20/2023	BU	Email to CH re Kennedy's position on applicable time period for shortfall calculation	1.00	\$790.00	\$790.00								
	6/20/2023	BU	Compile notes of moot for circulation	1.50	\$790.00	\$1,185.00								
	6/20/2023	BU	In-person moot at Schneider Wallace	3.50	\$790.00	\$2,765.00								
	6/21/2023	KAS	Receive update from BU re in-person moot session at Schneider Wallace	0.40	\$925.00	\$370.00								
	6/21/2023	BU	Compile notes from in-person moot	1.00	\$790.00	\$790.00								
	6/21/2023	BU	Record evidence re transfer trauma	4.20	\$790.00	\$3,318.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	6/21/2023	BU	Email to CH re Brookdale petition denial and judges on the order (Friedland, Sung)	0.40	\$790.00	\$316.00			0.4	316				
	6/22/2023	BU	Email to CH re BU declaration exhibit and inclusion in appellate record	0.40	\$790.00	\$316.00								
	6/29/2023	BU	Flores Table 3 task time corroboration evidence and phone call with CH re same	1.00	\$790.00	\$790.00								
	6/29/2023	BU	Compile reference list of exhibits for CH oral argument - redacted volumes	3.30	\$790.00	\$2,607.00								
	7/3/2023	KAS	Emails to CH re appellate panel and Fwd to BU re same	0.30	\$925.00	\$277.50								
	7/3/2023	BU	Other payor' project - review plaintiff and class declarant depo t'scripts	3.10	\$790.00	\$2,449.00								
	7/3/2023	BU	Compile additional evidence in record, if any, re 'other payors', procedure to further supplement appellate record	1.30	\$790.00	\$1,027.00								
	7/3/2023	BU	Review appellate panel bios, legal research re class cert opinions if any	1.50	\$790.00	\$1,185.00								
	7/6/2023	BU	Review CH 'additional arguments' outline re damages models and other expert issues	1.00	\$790.00	\$790.00								
	7/6/2023	BU	Review Donato / conjoint analysis cases and payor/obligor cases	3.80	\$790.00	\$3,002.00								
	7/7/2023	BU	Review Clevinger line of cases re damages methodologies, Donato opinions and prep for Zoom	2.50	\$790.00	\$1,975.00								
	7/7/2023	BU	Zoom with CH, GW, M. Olivier, me re discussion of Clevinger line of cases re damages methodologies	0.50	\$790.00	\$395.00								
	7/10/2023	BU	Review record for citations to other facts identified per CH in prep for oral argument	1.80	\$790.00	\$1,422.00								
	7/10/2023	BU	Review record re Flores evidence, email and phone call with CH re same	1.00	\$790.00	\$790.00								
	7/11/2023	BU	Watch 9th Circuit oral argument	1.00	\$790.00	\$790.00			1	790				
	7/11/2023	KAS	Watch 9th Circuit oral argument	1.00	\$925.00	\$925.00								
	7/12/2023	BU	Phone call with CH re under seal filings, post-hearing strategy re same	0.50	\$790.00	\$395.00								
	7/12/2023	BU	Review district court sealing orders in connection with class certification filing	0.50	\$790.00	\$395.00								
	7/12/2023	KAS	Email correspondence with CH re C. Lee	0.50	\$925.00	\$462.50								
	7/13/2023	BU	Compile status of pre-appeal discovery and class list/notice outstanding items	1.00	\$790.00	\$790.00								
	7/13/2023	BU	9th Circuit rules re response to petition for rehearing / rehearing en banc	0.50	\$790.00	\$395.00								
	7/17/2023	BU	Compile list of outstanding discovery / class notice items pending stay/appeal and forward same to CH.	2.60	\$790.00	\$2,054.00								
	7/18/2023	BU	Review draft 28(j) letter response and email to CH re same	0.70	\$790.00	\$553.00								
	7/24/2023	BU	Review file re Sunrise financial statements re settlement	0.70	\$790.00	\$553.00								
	7/28/2023	KAS	Texts and calls re 9th Circuit hearing/oral argument w/Ganz	0.30	\$925.00	\$277.50								
	7/30/2023	KAS	Texts w/Ganz re post-certification strategy	0.10	\$925.00	\$92.50								
	8/1/2023	KAS	Email to CH re settlement status	0.30	\$925.00	\$277.50								
	8/2/2023	KAS	Text w/C. Lee re decision, emails	0.50	\$925.00	\$462.50								
	8/2/2023	KAS	Call with CH re mediation	0.40	\$925.00	\$370.00								
	8/3/2023	BU	Review 9th Circuit opinion affirming grant of class certification	1.00	\$790.00	\$790.00								
	8/3/2023	BU	Phone call with CH re 9th Circuit Order affirming grant of class certification.	0.30	\$790.00	\$237.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
	8/4/2023 BU	Research re payment of advance monthly fees and record support	5.70		\$790.00	\$4,503.00								
	8/6/2023 KAS	Call w/C. Lee re Mediation, emails	0.50		\$925.00	\$462.50								
	8/7/2023 BU	Research re payment of advance monthly fees and record support, pertinent discovery in hand and forthcoming re same	0.90		\$790.00	\$711.00								
	8/7/2023 BU	Memo to CH re payment of advance monthly fees and record support, pertinent discovery in hand and forthcoming re same	1.50		\$790.00	\$1,185.00								
	8/9/2023 BU	Research re evidence of occupancy rates in documents produced in discovery and email to CH re same	4.50		\$790.00	\$3,555.00								
	8/21/2023 BU	M&C letter re post-appeal discovery	3.50		\$790.00	\$2,765.00								
	8/22/2023 KAS	Review discovery M&C letter, discussion with BU re same	0.50		\$925.00	\$462.50								
	8/22/2023 BU	Finalize M&C letter, forward to CH, GW, KAS	1.00		\$790.00	\$790.00								
	8/22/2023 KAS	Texts and emails w/C. Lee re Mediation	0.60		\$925.00	\$555.00								
	8/22/2023 BU	Review draft schedule / strategy plan and email to CH, GW, KAS re same	1.10		\$790.00	\$869.00								
	8/22/2023 BU	Review file/correspondence re motion for leave to notice Slichta depo and resolution, discovery order re same	0.70		\$790.00	\$553.00								
	8/22/2023 BU	Strategy call with CH, GW	0.70		\$790.00	\$553.00								
	8/22/2023 KAS	Email to CH re settlement status	0.20		\$925.00	\$185.00								
	8/22/2023 KAS	Review draft schedule/strategy plan	0.20		\$925.00	\$185.00								
	8/22/2023 KAS	Discussion with BU re draft schedule/strategy plan	0.30		\$925.00	\$277.50								
	8/23/2023 KAS	Review team settlement strategy emails	0.50		\$925.00	\$462.50								
	8/23/2023 BU	Review settlement strategy emails	0.30		\$790.00	\$237.00								
	8/23/2023 BU	Further edits to M&C letter based on yesterday's meeting	3.10		\$790.00	\$2,449.00								
	8/23/2023 BU	Call with CH re M&C letter	0.40		\$790.00	\$316.00								
	8/23/2023 BU	Review move in fee analysis memo and forward Zack handbill to CH	0.50		\$790.00	\$395.00								
	8/23/2023 BU	Phone call with DM re location room/bed data	0.40		\$790.00	\$316.00								
	8/24/2023 BU	Finalize M&C letter and forward to CH	0.30		\$790.00	\$237.00								
	8/24/2023 BU	Zoom with CH, P. Kennedy re damages	0.50		\$790.00	\$395.00								
	8/24/2023 BU	Notes re meet and confer wishlist based on RPD 231, definitions, and RPD 231	0.90		\$790.00	\$711.00								
	8/24/2023 BU	Phone call with putative class member - fact gathering	1.00		\$790.00	\$790.00			1	790				
	8/25/2023 BU	Finalize M&C letter and send to counsel	0.30		\$790.00	\$237.00								
	8/25/2023 KAS	Review discovery M&C letter	0.50		\$925.00	\$462.50								
	8/28/2023 BU	Email to A. Fearn re case update	0.30		\$790.00	\$237.00								
	8/31/2023 KAS	Emails and texts w/C. Lee re Mediation	0.50		\$925.00	\$462.50								
	9/2/2023 KAS	Texts w/Ganz	0.20		\$925.00	\$185.00								
	9/3/2023 BU	CH-assigned tasks re refund policy, evidence of payments made, other payors	1.80		\$790.00	\$1,422.00								
	9/3/2023 BU	Email correspondence with CH re post-mandate to-do items including scope of payroll data produced to date and agreement re Sunrise communications with class members	0.70		\$790.00	\$553.00								
	9/5/2023 BU	Recirculate to co-counsel post-appeal outstanding discovery meet and confer letter	0.20		\$790.00	\$158.00								
	9/6/2023 BU	Other payor' research - Ops Manual re refunds; examples of refunds	0.80		\$790.00	\$632.00								
	9/6/2023 BU	Review declarations and identify unhappy campers who paid from own (non-elder) funds	1.30		\$790.00	\$1,027.00								
	9/6/2023 BU	Phone call with CH re 'other payors'	0.40		\$790.00	\$316.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs	Falkenberg	Travel	
					Worked	Fees	General	Fees				
							Hrs	Fees	Hrs	Fees	Hrs	Fees
	9/8/2023	BU	Email to counsel re scheduling M&C	0.20	\$790.00	\$158.00						
	9/8/2023	BU	Emails to DM, JT, CH attaching index of facility floor plans produced	0.60	\$790.00	\$474.00						
	9/8/2023	BU	in discovery and those relied upon by Schroyer	1.00	\$790.00	\$790.00						
	9/8/2023	BU	Call with CH, DM, JT re discovery / data									
	9/11/2023	BU	Phone call with CH re 'other payor' issue and forward research to	0.50	\$790.00	\$395.00						
	9/14/2023	BU	date re same.	3.30	\$790.00	\$2,607.00						
	9/14/2023	BU	Prep for post-appeal discovery meet and confer									
	9/14/2023	BU	Email correspondence with JT re production of MedModel MOD files	0.40	\$790.00	\$316.00						
	9/14/2023	BU	Phone calls with CH re post-appeal discovery meet and confer	0.70	\$790.00	\$553.00						
	9/15/2023	BU	Prep for telephonic discovery M&C	0.70	\$790.00	\$553.00						
	9/15/2023	BU	Email summary of telephonic M&C to CH, GW	0.50	\$790.00	\$395.00						
	9/15/2023	BU	Email correspondence with MY identifying 3 defense declarants who	0.80	\$790.00	\$632.00						
	9/15/2023	BU	purport to have paid on behalf of their loved one	1.00	\$790.00	\$790.00						
	9/15/2023	BU	Telephonic discovery M&C with J. Gorman									
	9/21/2023	BU	Email to Gorman re discovery follow up and emails with DM, JT re	0.50	\$790.00	\$395.00						
	9/21/2023	BU	same	1.00	\$790.00	\$790.00						
	9/21/2023	BU	Call with CH, MY re class member outreach project	0.40	\$790.00	\$316.00			0.4	316		
	9/21/2023	BU	Emails with CH, Heidi Adams re Judicate West continuing role									
	9/22/2023	BU	Emails with DM, CH re explanation for need for resident room	0.50	\$790.00	\$395.00						
	9/22/2023	BU	numbers and location bed data in assessment data production									
	9/22/2023	BU	Email to J. Gorman re follow up items from meet and confer a week	0.80	\$790.00	\$632.00						
	9/22/2023	BU	earlier, including billing data, resident room numbers, class list, and									
	9/22/2023	BU	other outstanding items	2.80	\$790.00	\$2,212.00						
	9/24/2023	BU	Compile helpful excerpts from 2d class certification and Daubert	0.10	\$925.00	\$92.50						
	9/24/2023	BU	hearings and circulate to team	0.20	\$925.00	\$185.00						
	9/26/2023	KAS	Text w/C. Lee re Mediation									
	9/27/2023	KAS	Email to CH re potential mediator	3.00	\$790.00	\$2,370.00						
	9/27/2023	BU	Compile testimony from named plaintiffs re staffing expectations	0.50	\$790.00	\$395.00						
	9/27/2023	BU	and emails with GW re same									
	9/27/2023	BU	Draft response to email from J. Gorman responding to outstanding	0.40	\$790.00	\$316.00						
	9/27/2023	BU	discovery	0.50	\$790.00	\$395.00						
	9/28/2023	BU	Review team / co-counsel emails re mediator selection and strategy	0.50	\$925.00	\$462.50						
	9/28/2023	BU	going forward	0.20	\$925.00	\$185.00						
	9/28/2023	KAS	Email to CH re potential mediator	0.30	\$790.00	\$237.00						
	9/29/2023	KAS	Email to CH re Call today	1.70	\$925.00	\$1,572.50			0.2	185		
	9/29/2023	KAS	Phone call with CH re discovery	0.70	\$790.00	\$553.00						
	9/29/2023	BU	Texts and calls and Meeting w/C. Lee re Mediation	0.60	\$925.00	\$555.00						
	9/29/2023	KAS	Phone call with CH re discovery / meet and confer									
	9/30/2023	BU	Texts, calls, emails w/C. Lee re Mediation									
	9/30/2023	KAS	Further edits to email responding to J. Gorman's 9/27 discovery meet	0.50	\$790.00	\$395.00						
	9/30/2023	BU	and confer email	0.40	\$790.00	\$316.00						
	10/1/2023	BU	Phone call with CH re discovery meet and confer	0.50	\$790.00	\$395.00						
	10/2/2023	BU	Finalize meet and confer email to Gorman	0.30	\$925.00	\$277.50						
	10/2/2023	KAS	Email to CH re claims made settlement concept	0.70	\$925.00	\$647.50						
	10/3/2023	KAS	Texts, calls, emails w/C. Lee re Mediation	0.50	\$790.00	\$395.00						
	10/4/2023	BU	Call with CH, MY, Karen Ellis re class member outreach									
	10/4/2023	BU	Review draft outreach emails and draft class member declaration	0.50	\$790.00	\$395.00						
	10/4/2023	BU	template	0.20	\$790.00	\$158.00						
	10/4/2023	BU	Email to J. Gorman re status of class list									

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	10/5/2023	KAS	Email to CH/GW/DM re mediation	0.20	\$925.00	\$185.00								
	10/5/2023	KAS	Call w/C. Lee re mediation	0.40	\$925.00	\$370.00								
	10/6/2023	BU	Emails with defense re document production download errors	0.40	\$790.00	\$316.00								
	10/9/2023	BU	Initial review of doc production SUN051 (Winkle emails)	1.00	\$790.00	\$790.00								
	10/9/2023	BU	Emails with J. Gorman re Sunrise production numbering	0.20	\$790.00	\$158.00			0.2	158				
	10/10/2023	KAS	Texts w/Ganz re Mediation call	0.30	\$925.00	\$277.50								
	10/12/2023	KAS	Calls, texts, emails w/C. Lee re mediation	0.50	\$925.00	\$462.50								
	10/16/2023	KAS	Texts, emails, calls w/C. Lee re mediation	0.40	\$925.00	\$370.00								
	10/16/2023	BU	Email correspondence with MY re most recent iteration of class list	0.40	\$790.00	\$316.00								
	10/17/2023	KAS	Email to CH re Heredia mediation	0.20	\$925.00	\$185.00								
	10/20/2023	BU	Email to counsel re position on temporal scope of class period and case schedule	0.30	\$790.00	\$237.00								
	10/20/2023	BU	Phone call with CH re status / strategy / Winkle production	0.70	\$790.00	\$553.00								
	10/20/2023	BU	Review newest doc production - SUN051	5.00	\$790.00	\$3,950.00								
	10/20/2023	BU	Review CH email re recent Sunrise business changes/ownership and remaining CA facilities	0.40	\$790.00	\$316.00								
	10/20/2023	KAS	Read CH email re Sunrise business owners	0.50	\$925.00	\$462.50								
	10/21/2023	KAS	Email to KG/KF/KC/DZ re Sunrise - business update	0.20	\$925.00	\$185.00								
	10/23/2023	BU	Doc review (SUN051)	3.00	\$790.00	\$2,370.00								
	10/24/2023	BU	Phone call with CH re schedule, mediation	0.40	\$790.00	\$316.00								
	10/25/2023	BU	Discovery, class list, class period omnibus letter and forward to CH for review/comment	3.50	\$790.00	\$2,765.00								
	10/26/2023	BU	Phone call with J. Gorman re discovery production status update (re residency agreements, class period position update)	0.30	\$790.00	\$237.00								
	10/28/2023	KAS	Discussion with BU re consumer staffing expectations	0.50	\$925.00	\$462.50								
	10/31/2023	BU	Email to CH updating on status of discovery productions, including class list and Sunrise position on class period scope	0.40	\$790.00	\$316.00								
	10/31/2023	BU	Review class list and related correspondence, produced via email today and forward class list to MY	0.50	\$790.00	\$395.00								
	11/1/2023	KAS	Emails to CH re mediation	0.40	\$925.00	\$370.00								
	11/1/2023	BU	Email to MY forwarding latest iteration of class list (and related documents/correspondence)	0.30	\$790.00	\$237.00								
	11/1/2023	KAS	Texts, calls, and emails w/C. Lee re mediation	0.70	\$925.00	\$647.50								
	11/1/2023	BU	Phone call with J. Gorman re class period letter	0.30	\$790.00	\$237.00								
	11/1/2023	KAS	Meeting with BU re litigation status and mediation	1.00	\$925.00	\$925.00								
	11/1/2023	BU	Edits to class period letter and send to counsel	0.50	\$790.00	\$395.00								
	11/1/2023	BU	Phone call with CH re case status, strategy	0.30	\$790.00	\$237.00								
	11/1/2023	BU	Email to CH re Sunrise proposal on class period	0.20	\$790.00	\$158.00								
	11/1/2023	BU	Meeting with KAS re litigation status and mediation	1.00	\$790.00	\$790.00								
	11/2/2023	KAS	Discussion with BU re class period issue and case schedule	0.50	\$925.00	\$462.50								
	11/2/2023	KAS	Emails to CH re mediation	0.40	\$925.00	\$370.00								
	11/2/2023	BU	Discussion with KAS re class period issue and case schedule	0.50	\$790.00	\$395.00								
	11/3/2023	KAS	Call w/C. Lee, texts	2.10	\$925.00	\$1,942.50								
	11/3/2023	KAS	Sunrise call w/team re class member outreach	1.20	\$925.00	\$1,110.00								
	11/3/2023	BU	Phone call with CH re discovery status, class period issues, for Friday's call with team	0.30	\$790.00	\$237.00								
	11/4/2023	BU	Phone call with KAS re mediation, case schedule	1.00	\$790.00	\$790.00								
	11/4/2023	KAS	Phone call with BU re mediation, case schedule	1.00	\$925.00	\$925.00								
	11/6/2023	KAS	Texts w/C. Lee	0.20	\$925.00	\$185.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	11/7/2023	BU	Emails with DM, CH, MY re employee names from medical records produced in litigation	0.20	\$790.00	\$158.00								
	11/7/2023	BU	Download and communicate with R. Bonner re uploading newest Sunrise document productions into Relativity (SUN052-054)	0.60	\$790.00	\$474.00			0.6	474				
	11/7/2023	BU	Phone call with CH re request for status conference	0.30	\$790.00	\$237.00								
	11/8/2023	KAS	Phone call with CH, BU re settlement/mediation	0.50	\$925.00	\$462.50								
	11/8/2023	BU	Download newest productions (SUN050, -52, -53, -54)	0.70	\$790.00	\$553.00			0.7	553				
	11/8/2023	BU	Emails to J. Gorman re passwords	0.10	\$790.00	\$79.00			0.1	79				
	11/8/2023	BU	Phone call with KAS, CH re settlement/mediation	0.50	\$790.00	\$395.00								
	11/9/2023	BU	Forward sample electronic resident assessment data production link to DM, JT	0.20	\$790.00	\$158.00			0.2	158				
	11/9/2023	KAS	Work on letter, calls, texts w/C. Lee	0.90	\$925.00	\$832.50								
	11/9/2023	KAS	Emails to BU re fees/costs	0.40	\$925.00	\$370.00			0.4	370				
	11/9/2023	BU	Email correspondence re passwords for Sunrise productions SUN052-054	0.40	\$790.00	\$316.00			0.4	316				
	11/10/2023	BU	Compile mediation materials for final review (cover letter, Oakmont / Aegis injunctions, deal sheet) and send to C. Lee	1.10	\$790.00	\$869.00								
	11/10/2023	BU	Email to MY re class member outreach efforts	0.20	\$790.00	\$158.00								
	11/10/2023	BU	Draft request for Rule 16(a) status conference re class period clarification	5.60	\$790.00	\$4,424.00								
	11/10/2023	BU	Review DM email analysis of sample electronic assessment data - compare to earlier samples	0.70	\$790.00	\$553.00								
	11/10/2023	KAS	Calls with C. Lee re deal sheet	1.80	\$925.00	\$1,665.00								
	11/10/2023	KAS	Calls w/CH re C. Lee, deal sheet	0.50	\$925.00	\$462.50								
	11/11/2023	BU	Draft/further edits to request for Rule 16(a) status conference and forward same to CH	1.00	\$790.00	\$790.00								
	11/12/2023	BU	Edits to request for Rule 16(a) status conference	1.00	\$790.00	\$790.00								
	11/13/2023	KAS	Email to CH re mediation update	0.20	\$925.00	\$185.00								
	11/14/2023	BU	Email to J. Gorman attaching draft joint request for status conference	0.30	\$790.00	\$237.00								
	11/14/2023	KAS	Texts and call re mediation w/Ganz	0.30	\$925.00	\$277.50								
	11/14/2023	BU	Review correspondence from J. Gorman re discovery items/status	0.50	\$790.00	\$395.00								
	11/14/2023	BU	Legal research re temporal scope of class period, defined "through date of judgment."	4.00	\$790.00	\$3,160.00								
	11/14/2023	BU	Forward in re Walmart to CH	0.20	\$790.00	\$158.00								
	11/14/2023	BU	Edit request for status conference accordingly	0.30	\$790.00	\$237.00								
	11/14/2023	BU	Email to CH re call with J. Gorman on request for status conference	0.20	\$790.00	\$158.00								
	11/14/2023	BU	Phone call with J. Gorman re Ps' request for Rule 16(a) status conference and potential joint request	0.40	\$790.00	\$316.00								
	11/15/2023	BU	Draft motion for clarification on scope of class period, BU declaration	6.80	\$790.00	\$5,372.00								
	11/15/2023	BU	Legal research re motion for clarification on scope of class period	2.00	\$790.00	\$1,580.00								
	11/15/2023	BU	Draft BU declaration iso motion for clarification re class period	1.00	\$790.00	\$790.00								
	11/16/2023	BU	Draft motion for clarification on scope of class period, BU declaration and forward to CH	2.50	\$790.00	\$1,975.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs	Falkenberg	Travel	
					Worked	Fees	General	Fees				
							Hrs	Fees	Hrs	Fees	Hrs	Fees
	11/16/2023	BU	Additional edits to BU declaration iso motion for clarification on class period and forward to CH	0.90	\$790.00	\$711.00						
	11/16/2023	BU	Forward approved form of class notice to CH	0.40	\$790.00	\$316.00						
	11/16/2023	BU	Email to J. Gorman checking on status of request for status conference	0.20	\$790.00	\$158.00						
	11/17/2023	BU	Review CH comments/edits on draft motion for clarification on class period	0.50	\$790.00	\$395.00						
	11/17/2023	BU	Review Sunrise's revised draft of request for status conference and forward same to CH	0.40	\$790.00	\$316.00						
	11/19/2023	KAS	Texts w/Ganz re mediation	0.30	\$925.00	\$277.50						
	11/20/2023	BU	Review CH's edits to Sunrise's revised draft of request for status conference and forward same to J. Gorman	0.30	\$790.00	\$237.00						
	11/21/2023	BU	Email to J. Gorman requesting status of Sunrise position on Ps' edits to Sunrise's revised draft of request for status conference	0.20	\$790.00	\$158.00						
	11/22/2023	BU	Emails with J. Gorman exchanging final edits to request for status conference and proposed order and file same	1.50	\$790.00	\$1,185.00						
	11/27/2023	KAS	Texts, C. Lee, calls, emails, team	0.70	\$925.00	\$647.50						
	11/27/2023	KAS	Email to CH re mediation cancellation deadline	0.20	\$925.00	\$185.00						
	11/27/2023	BU	Trial proof matrix project - source documents and link	7.90	\$790.00	\$6,241.00			7.9	6241		
	11/28/2023	BU	Trial proof matrix project - source documents and link	7.60	\$790.00	\$6,004.00			7.6	6004		
	11/28/2023	BU	Email to DM re Sunrise care levels and included tasks	0.80	\$790.00	\$632.00						
	11/30/2023	BU	Trial proof matrix project - source documents and link	4.60	\$790.00	\$3,634.00			4.6	3634		
	11/30/2023	BU	Review CH's draft of trial brief	0.50	\$790.00	\$395.00			0.5	395		
	11/30/2023	BU	Phone call re draft trial brief	0.30	\$790.00	\$237.00			0.3	237		
	11/30/2023	BU	Emails with CH re May 2021 CLM inspection and CLM's use of 'helper hours'	0.40	\$790.00	\$316.00						
	11/30/2023	BU	Email to DM attaching Sunrise residency agreement	0.30	\$790.00	\$237.00						
	12/1/2023	BU	Fill citations to draft trial brief and forward to CH	4.50	\$790.00	\$3,555.00			4.5	3555		
	12/2/2023	KAS	Texts w/C. Lee re mediation/settlement	0.30	\$925.00	\$277.50						
	12/3/2023	KAS	Calls, texts w/C. Lee re mediation	0.60	\$925.00	\$555.00						
	12/3/2023	KAS	Email to CH re settlement update	0.20	\$925.00	\$185.00						
	12/4/2023	KAS	Fwd to CH re Trial prep meeting	0.20	\$925.00	\$185.00			0.2	185		
	12/5/2023	BU	Compile trial prep materials for CH/team re meeting in TX - key documents	3.50	\$790.00	\$2,765.00			3.5	2765		
	12/6/2023	KAS	Call, texts C. Lee re mediation/settlement	0.60	\$925.00	\$555.00						
	12/6/2023	BU	Email to J. Gorman re assessment data sample, incorporating co-counsel comments and forward to CH, DM	0.70	\$790.00	\$553.00						
	12/6/2023	KAS	Texts, calls w/C. Lee's team re mediation	2.50	\$925.00	\$2,312.50						
	12/6/2023	BU	Retrieve CLRA notice letter and forward to CH	0.40	\$790.00	\$316.00						
	12/6/2023	BU	GoToMeeting with JT, DM, CH, MY re trial prep meeting and assessment data	1.00	\$790.00	\$790.00			1	790		
	12/8/2023	BU	Email to J. Gorman detailing additional questions about the most recent iteration of assessment data sample	0.50	\$790.00	\$395.00						
	12/8/2023	KAS	Texts w/C. Lee re mediation	0.10	\$925.00	\$92.50						
	12/9/2023	KAS	Texts w/C. Lee re mediation	0.20	\$925.00	\$185.00						
	12/11/2023	BU	Review Sunrise email re counter in advance of January mediation	0.20	\$790.00	\$158.00						
	12/11/2023	KAS	Emails w/C. Lee re mediation	0.50	\$925.00	\$462.50						
	12/11/2023	KAS	Email correspondence with CH and C. Lee re 1/10-1/11/24 Philadelphia mediation and Fwd to BU, GW, DM re same	0.80	\$925.00	\$740.00						

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg	Travel	
					Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	
	12/11/2023	BU	Email to team (JT, CH) re data of Sunrise PPT SUN0110524	0.40	\$790.00	\$316.00							
	12/11/2023	BU	Emails with DM, CH re draft request for cross-over report linking resident ids in class list vs billed service history	0.40	\$790.00	\$316.00							
	12/11/2023	BU	Email to J. Gorman re request for cross-over report linking resident ids in class list vs billed service history	0.10	\$790.00	\$79.00							
	12/13/2023	BU	Email to MY attaching SUN0138872	0.20	\$790.00	\$158.00							
	12/13/2023	BU	Email to CH re status of pendant data request to Sunrise	0.30	\$790.00	\$237.00							
	12/15/2023	KAS	Emails to Amy Fearn/BU/MY re written complaint request	0.40	\$925.00	\$370.00							
	12/16/2023	KAS	Texts re Mediation w/Ganz	0.20	\$925.00	\$185.00							
	12/16/2023	KAS	Email to Amy Fearn re written complaint request	0.20	\$925.00	\$185.00							
	12/18/2023	BU	Email to J. Gorman requesting status of production of MedSummit documents and further explanation of time periods of available pendant data	0.30	\$790.00	\$237.00							
	12/18/2023	BU	Review email correspondence with J. Gorman re resident ids and pendant data request - status updates and emails with CH re same	0.40	\$790.00	\$316.00							
	12/19/2023	BU	Review email from J. Gorman re available pendant data by facility / date and forward same to CH	0.50	\$790.00	\$395.00							
	12/20/2023	BU	Review MY emails re class member outreach efforts/results	0.50	\$790.00	\$395.00							
	12/21/2023	BU	Further citations to mediation brief and forward to CH	3.50	\$790.00	\$2,765.00							
	12/22/2023	BU	Email to CH, DM, JT re production of pendant response data in this case	0.40	\$790.00	\$316.00							
	12/28/2023	BU	Email to CH re confidentiality of mediation brief	0.40	\$790.00	\$316.00							
	12/29/2023	BU	Review/edits to mediation brief and forward to CH	3.40	\$790.00	\$2,686.00			0.4	160			
	1/2/2024	KAS	Call re mediation w/Ganz	0.60	\$925.00	\$555.00							
	1/2/2024	BU	Email to DM re status of production of electronic resident assessment data	0.20	\$790.00	\$158.00							
	1/3/2024	BU	Draft letter re late production of electronic resident assessment data and forward to CH	1.70	\$790.00	\$1,343.00			1	600			
	1/3/2024	BU	Obtain Lacey deposition video from court reporter	0.50	\$790.00	\$395.00			0.5	395			
	1/4/2024	BU	Draft letter to Sunrise memorializing failure to produce class member data, particularly assessment data and forward to CH and further edits	2.30	\$790.00	\$1,817.00			0.3	180			
	1/4/2024	BU	Review Sunrise mediation brief	2.60	\$790.00	\$2,054.00			0.6	360			
	1/4/2024	KAS	Email to CH re mediation prep call	0.20	\$925.00	\$185.00							
	1/4/2024	KAS	Call re w/Fearn re mediation, availability	0.80	\$925.00	\$740.00							
	1/5/2024	BU	Forward discovery letter concerning missing assessment data to C. Lee	0.20	\$790.00	\$158.00							
	1/5/2024	BU	Zoom call re mediation prep (CH, MY, DM, GW)	1.00	\$790.00	\$790.00							
	1/6/2024	BU	Legal research re recovery of expert costs and emails with CH, GW re same	1.00	\$790.00	\$790.00							
	1/7/2024	KAS	Emails to CH re Philadelphia Flight info and clients	0.40	\$925.00	\$370.00							
	1/7/2024	BU	Legal research re recovery of expert costs and lodestar enhancements for expert fees advanced in contingency	2.50	\$790.00	\$1,975.00							
	1/7/2024	KAS	Texts w/Fearn re mediation / strategy	0.20	\$925.00	\$185.00							
	1/8/2024	BU	Review letter from counsel responding to missing absent class member data	0.50	\$790.00	\$395.00							
	1/8/2024	KAS	Texts, calls, emails C. Lee's team re mediation	1.50	\$925.00	\$1,387.50							
	1/9/2024	KAS	Travel - SFO to PHL	10.00	\$925.00	\$9,250.00							10
	1/10/2024	KAS	Philadelphia Mediation, Meetings	12.00	\$925.00	\$11,100.00							

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	1/10/2024	BU	Gather and forward to CH Kennedy declarations valuing injunction in Aegis, Oakmont class cases	0.80	\$790.00	\$632.00								
	1/11/2024	KAS	Philadelphia Mediation, Meetings	5.50	\$925.00	\$5,087.50								
	1/11/2024	KAS	Travel - PHL to SFO	10.00	\$925.00	\$9,250.00								10
	1/12/2024	KAS	Email to BU re last sunrise lodestar question	0.20	\$925.00	\$185.00								
	1/12/2024	BU	Review Aegis and Oakmont settlement distribution correspondence re Sunrise mediator proposal and phone call with CH re same	1.70	\$790.00	\$1,343.00								
	1/13/2024	KAS	Emails to CH re team call and mediation follow-up	0.40	\$925.00	\$370.00								
	1/22/2024	KAS	Lee Call with /Texts/calls re settlement agreement/injunction negotiations	1.40	\$925.00	\$1,295.00								
	1/23/2024	KAS	Lee Call with /Texts/calls re agreement	0.80	\$925.00	\$740.00								
	1/23/2024	KAS	Call/text CH re status	0.50	\$925.00	\$462.50								
	1/23/2024	KAS	Call w/Fearn re proposal	0.40	\$925.00	\$370.00								
	1/25/2024	BU	Prepare and circulate under seal filing papers and position statement on class period and forward to CH, MY, L. Valdez	2.50	\$790.00	\$1,975.00								
	1/25/2024	BU	Further edits to position statement on class period issue; supporting BU declaration	3.40	\$790.00	\$2,686.00			1	600				
	1/25/2024	BU	Phone call with MY re DSS citations re position statement on class period issue	0.40	\$790.00	\$316.00								
	1/25/2024	BU	Email to J. Gorman re confidentiality status of SUN0161385 and SUN0110524 in connection with class period termination date	0.30	\$790.00	\$237.00								
	1/25/2024	KAS	position statement	0.30	\$790.00	\$237.00								
	1/25/2024	KAS	Email to CH re settlement status update for court	0.20	\$925.00	\$185.00								
	1/26/2024	BU	Finalize class period position statement and work with L. Valdez to file	1.70	\$790.00	\$1,343.00								
	1/26/2024	BU	Emails with J. Gorman re procedure for filing	0.30	\$790.00	\$237.00								
	1/29/2024	KAS	Call with /Texts/calls with C. Lee re settlement agreement terms	0.40	\$925.00	\$370.00								
	1/29/2024	KAS	Emails to CH re update	0.20	\$925.00	\$185.00								
	1/29/2024	KAS	Emails with CH re injunction	0.50	\$925.00	\$462.50								
	1/30/2024	BU	Email correspondence with CH re status of pendant data requests/negotiations	0.30	\$790.00	\$237.00								
	1/31/2024	BU	Email to CH attaching Sunrise brief (joint statement on MTC further discovery) discussing available pendant data	0.40	\$790.00	\$316.00								
	2/1/2024	KAS	Email to CH re team call scheduling/availability	0.20	\$925.00	\$185.00			0.2	185				
	2/1/2024	KAS	Emails to CH re injunction conference call	0.30	\$925.00	\$277.50			0.3	277.5				
	2/2/2024	BU	Team (CH, MY, DM, GW, KAS) call re injunction terms	0.80	\$790.00	\$632.00					0.3	237		
	2/3/2024	BU	Review Sunrise mediation brief	0.90	\$790.00	\$711.00								
	2/3/2024	KAS	Call with /Texts/calls re C. Lee settlement agreement	1.60	\$925.00	\$1,480.00								
	2/3/2024	KAS	Emails CH, Team - re injunction negotiation status	0.50	\$925.00	\$462.50								
	2/4/2024	KAS	Call with /Texts/calls with C. Lee re agreement	0.80	\$925.00	\$740.00								
	2/4/2024	KAS	Email/call CH re status	0.50	\$925.00	\$462.50								
	2/5/2024	BU	Email correspondence with L. Valdez, CH re order on under seal filing	0.40	\$790.00	\$316.00								
	2/5/2024	KAS	Email to CH re injunction	0.30	\$925.00	\$277.50								
	2/6/2024	KAS	Discussion with BU re WaPo reporter request for information	0.30	\$925.00	\$277.50								
	2/6/2024	BU	Email correspondence to D. MacMillan (WaPo) attaching public Sunrise filings	0.50	\$790.00	\$395.00								
	2/6/2024	BU	Discussion with KAS re WaPo articlw	0.20	\$790.00	\$158.00								
	2/7/2024	BU	Phone call with L. Valdez re under seal filing	0.20	\$790.00	\$158.00			0.2	158				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
				Worked			General Hrs							
		Call with /Texts/calls re C. Lee settlement agreement/injunction terms	1.30	\$925.00		\$1,202.50								
2/7/2024	KAS	Call/text with CH re status	0.40	\$925.00		\$370.00								
2/8/2024	KAS	Call with /Texts/calls with C. Lee re agreement/calls	1.40	\$925.00		\$1,295.00								
2/8/2024	KAS	Emails CH, Team re injunction terms	0.40	\$925.00		\$370.00								
2/8/2024	BU	Email with D. MacMillan (WaPo) re publicly available Sunrise filings Review joint statement on mediation status and forward to J.	0.20	\$790.00		\$158.00			0.2	158				
2/9/2024	BU	Gorman requesting that we file on Monday	0.40	\$790.00		\$316.00								
2/9/2024	KAS	Lee Call with /Texts/calls re agreement	0.60	\$925.00		\$555.00								
2/12/2024	BU	Review CH email re status of injunction negotiations	0.40	\$790.00		\$316.00								
2/12/2024	KAS	Call with /Texts/calls with C. Lee re agreement/calls	0.60	\$925.00		\$555.00								
2/12/2024	KAS	Emails CH/Team re negotiation status Review Order on class period termination date and setting status	0.30	\$925.00		\$277.50								
2/12/2024	BU	conference	0.30	\$790.00		\$237.00								
2/13/2024	KAS	Call with /Texts/calls with C. Lee re agreement/calls	0.30	\$925.00		\$277.50								
2/13/2024	KAS	Emails CH / Team re settlement negotiation status Email to CH, KAS re Sunrise's redaction of purported HIPAA	0.30	\$925.00		\$277.50								
2/14/2024	BU	information - re production of pendant data Draft letter to counsel addressing outstanding case scheduling issues	0.40	\$790.00		\$316.00								
2/15/2024	BU	(in the event settlement efforts fail) and forward to CH Call with /Texts/calls with C. Lee re settlement agreement /	2.30	\$790.00		\$1,817.00								
2/16/2024	KAS	injunction terms	1.80	\$925.00		\$1,665.00								
2/16/2024	KAS	Emails to CH / Team re same	0.40	\$925.00		\$370.00								
2/16/2024	KAS	Call w/Fearn re settlement	0.50	\$925.00		\$462.50								
2/16/2024	KAS	Calls w/Ganz re settlement	0.30	\$925.00		\$277.50								
2/16/2024	BU	Email to CH attaching form of approved class notice	0.40	\$790.00		\$316.00								
2/17/2024	KAS	Call w/Ganz re settlement	0.20	\$925.00		\$185.00								
2/17/2024	KAS	Email to CH re settlement reached	0.20	\$925.00		\$185.00								
2/21/2024	KAS	Emails to CH re client approval and draft settlement agreement	0.30	\$925.00		\$277.50								
2/21/2024	BU	Draft long/short form settlement notices and forward to CH Draft stipulated motion for substitution of deceased plaintiff and	1.00	\$790.00		\$790.00								
2/21/2024	BU	forward to CH	3.30	\$790.00		\$2,607.00								
2/22/2024	KAS	Email to BU re draft settlement agreement	0.20	\$925.00		\$185.00								
2/22/2024	BU	Forward Sunrise's draft of joint statement on settlement to CH Review CH edits to Sunrise's draft of joint statement on settlement	0.20	\$790.00		\$158.00								
2/22/2024	BU	and forward to J. Gorman Phone call with E. Ganz re settlement, substitution of Elise in place of	0.40	\$790.00		\$316.00								
2/22/2024	BU	her mother, Helen	0.50	\$790.00		\$395.00								
2/23/2024	BU	Email to E. Ganz requesting Helen Ganz's death certificate Draft Ganz successor-in-interest declaration re stipulated motion to	0.20	\$790.00		\$158.00								
2/23/2024	BU	substitute	1.00	\$790.00		\$790.00								
2/23/2024	BU	Phone calls with J. Gorman re requested information to value injunction	1.00	\$790.00		\$790.00								
2/23/2024	BU	Phone call with J. Gorman re joint statement on settlement to be filed today, stipulated motion for substitution of deceased plaintiff	0.20	\$790.00		\$158.00								
2/23/2024	BU	Follow up email to CH summarizing call with J. Gorman re joint statement on settlement to be filed today	0.10	\$790.00		\$79.00								
2/23/2024	BU	Further edits to joint statement on settlement based on same	0.10	\$790.00		\$79.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	2/23/2024	BU	Email to J. Green (CPT Group) re process for dissemination of class notice	0.30		\$790.00								
	2/24/2024	KAS	Call w/Fearn re settlement	0.60		\$925.00								
	2/26/2024	BU	Forward draft settlement papers to J. Gorman	0.30		\$790.00								
	2/26/2024	BU	Teams call with J. Green, CH re notice dissemination	0.20		\$790.00								
	2/27/2024	BU	Emails with L. Valdez and CH re Court order and status of 3/1 conference	0.40		\$790.00								
	2/28/2024	BU	Review J. Gorman email re settlement valuation item questions;	0.60		\$790.00								
	2/28/2024	BU	Email to L. Pettite re necessary items / date inputs for injunction valuation question	0.10		\$790.00								
	2/28/2024	BU	Draft proposed response and forward to CH for comment	0.20		\$790.00								
	2/28/2024	BU	Finalize stipulated motion to substitute deceased plaintiff, BU declaration, Ganz declaration, and proposed order to J. Gorman	1.70		\$790.00								\$1,343.00
	2/29/2024	BU	Review L. Pettite email re 'wish list' data items for injunction valuation question and email to CH re same	0.60		\$790.00								
	2/29/2024	BU	Email to CH including Sunrise data on average duration of residency, re injunction valuation questions	0.40		\$790.00								
	2/29/2024	BU	Email to J. Gorman re specifically identifying necessary injunction valuation items and reasons therefor, including draft Kennedy declaration	0.50		\$790.00								
	3/4/2024	BU	Forward J. Gorman's email response on injunction valuation items to CH	0.20		\$790.00								
	3/7/2024	BU	Review J. Gorman email with substantive response on injunction valuation items	0.30		\$790.00								
	3/7/2024	BU	Phone call with CH re same and forward response to J. Gorman	0.30		\$790.00								
	3/12/2024	BU	Email correspondence with CH, JT re injunction facilities for valuation analysis	0.30		\$790.00								
	3/13/2024	BU	Phone call with J. Gorman re update on settlement agreement draft	0.20		\$790.00								
	3/14/2024	BU	Phone call with J. Gorman re status of settlement agreement draft and injunction valuation items information	0.30		\$790.00								
	3/15/2024	BU	Email to J. Gorman requesting update on settlement agreement draft/comments	0.20		\$790.00								
	3/15/2024	BU	Emails and phone calls with CH, J. Gorman re Sunrise's comments/edits to settlement agreement and agreement to provide information to assist with valuing settlement injunction - and related scheduling issues	1.00		\$790.00								
	3/18/2024	BU	Emails and phone calls with CH, J. Gorman re Sunrise's comments/edits to settlement agreement and agreement to provide information to assist with valuing settlement injunction	0.30		\$790.00								
	3/18/2024	BU	Phone call with CH re Sunrise's comments/edits to settlement agreement and agreement to provide information to assist with valuing settlement injunction	0.40		\$790.00								
	3/19/2024	BU	Review CH email response to Sunrise re injunction valuation items and forward to J. Gorman	0.40		\$790.00								
	3/21/2024	KAS	Emails to CH and BU re response to Gorman re injunction valuation items	0.40		\$925.00								
	3/21/2024	BU	Emails with KAS, CH re response to Sunrise on settlement agreement draft, injunction valuation items, and motion for preliminary approval and send to C. Lee and J. Gorman, et al.	1.40		\$790.00								

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	4/4/2024	BU	Zoom with CH, MY, K. Ellis re class member outreach	0.70	\$790.00									
	4/4/2024	BU	Email to J. Gorman attaching redline edits to long/short form notices and explanatory email	1.80	\$790.00									
	4/5/2024	BU	Draft declaration of Amy Fearn in support of motion for preliminary approval	3.40	\$790.00									
	4/5/2024	BU	Motion for preliminary approval insert - case proceedings	3.70	\$790.00									
	4/6/2024	BU	Draft declaration of Amy Fearn in support of motion for preliminary approval	2.50	\$790.00									
	4/6/2024	BU	Draft declaration of Elise Ganz in support of motion for preliminary approval	3.00	\$790.00									
	4/7/2024	BU	Email to KAS, CH, GW, MY attaching draft declaration of Amy Fearn in support of motion for preliminary approval	1.30	\$790.00									
	4/7/2024	BU	Further edits to draft declaration of Elise Ganz in support of motion for preliminary approval	1.50	\$790.00									
	4/8/2024	BU	Review Sunrise's edits to long/short form notices and email to CH re same	1.30	\$790.00									
	4/8/2024	BU	Email to J. Gorman accepting edits	0.20	\$790.00									
	4/9/2024	BU	Email to Elise Ganz attaching declaration in support of motion for preliminary approval, with directions	0.50	\$790.00									
	4/9/2024	BU	Email to R. Bonner re volume of data produced by Sunrise and uploaded to Relativity - for inclusion in motion for preliminary approval	0.30	\$790.00									
	4/9/2024	BU	Further email negotiations with J. Gorman re long/short form settlement notice language	0.40	\$790.00									
	4/9/2024	BU	Review draft of motion for preliminary approval	2.00	\$790.00									
	4/9/2024	BU	Edits re same and forward to CH	0.70	\$790.00									
	4/9/2024	BU	Further edits to draft class rep declarations supporting motion for preliminary approval based on GW, CH edits	1.80	\$790.00									
	4/9/2024	BU	Email to Amy Fearn attaching declaration in support of motion for preliminary approval, with directions	0.70	\$790.00									
	4/10/2024	BU	Email to Amy Fearn attaching settlement agreement for signature	0.20	\$790.00									
	4/10/2024	BU	Revised insert for motion for preliminary approval on volume of discovery produced in litigation to date	0.50	\$790.00									
	4/10/2024	BU	Review CH chart re settlement comps in other rcfe class cases and email re same	0.30	\$790.00									
	4/10/2024	BU	Email to Elise Ganz attaching settlement agreement for signature	0.20	\$790.00									
	4/10/2024	BU	Email to MY re number of family member witnesses interviewed by class counsel	0.30	\$790.00									
	4/10/2024	BU	Email to J. Gorman re Sunrise of Cupertino and Sunrise of Orange and whether they are included in class	0.20	\$790.00									
	4/10/2024	BU	Forward Sunrise's edits to settlement notices to CH	0.20	\$790.00									
	4/10/2024	BU	Email to JT re volume of expert materials produced to Defendants to date - re motion for preliminary approval	0.20	\$790.00									
	4/11/2024	BU	Revised insert for motion for preliminary approval for scope of document productions (volume)	0.30	\$790.00									
	4/11/2024	KAS	Calls w/Elise Ganz re settlement papers	0.70	\$925.00									
	4/11/2024	BU	Email correspondence with GW, CH re revised class rep declaration language	1.50	\$790.00									

Fees	Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees
					Worked	Fees	General Hrs	Fees						
	4/11/2024	BU	Email to Amy Fearn re revised declaration	0.20		\$790.00								
	4/11/2024	BU	Phone call re same and finalize declaration for signature	0.40		\$790.00								
	4/11/2024	BU	Email correspondence with J. Gorman re class notice language revisions and estimated amount of move-in fees paid by class members	0.30		\$790.00								
	4/11/2024	BU	Obtain Elise Ganz's signatures on settlement agreement and declaration in support of preliminary approval	0.40		\$790.00								
	4/12/2024	BU	Phone call with CH re strategy/timing on filing of motion for preliminary approval	0.50		\$790.00								
	4/12/2024	BU	Email to J. Gorman attaching revised drafts of settlement notices and stipulation of settlement and requesting signatures	0.40		\$790.00								
	4/12/2024	BU	Review J. Gorman email re agreement on notice language and settlement agreement terms and move-in fees paid estimate	0.50		\$790.00								
	4/12/2024	BU	Emails with CH, L. Valdez re filing date(s) for motion for preliminary approval	0.40		\$790.00								
	4/12/2024	BU	Emails with J. Gorman, CH re final, agreed upon language for settlement notices	0.30		\$790.00								
	4/14/2024	BU	Email to J. Gorman attaching revised settlement papers and requesting class period start dates for Sunrise of Cupertino and Sunrise of Orange	0.90		\$790.00								
	4/15/2024	BU	Review J. Gorman email re Sunrise comments to motion for preliminary approval and forward same to CH	0.50		\$790.00								
	4/16/2024	BU	Email to J. Gorman re executed agreements	0.30		\$790.00								
	4/16/2024	BU	Forward Sunrise-executed settlement papers to CH	0.30		\$790.00								
	4/17/2024	BU	Finalize and file motion for preliminary approval and supporting papers	3.30		\$790.00								\$2,607.00
	4/17/2024	BU	Phone call with CH re motion for preliminary approval, courtesy copy to Sunrise	0.30		\$790.00								\$237.00
	4/17/2024	BU	Email to J. Gorman attaching courtesy copy of motion for preliminary approval and supporting papers	0.20		\$790.00								\$158.00
	4/17/2024	KAS	Fwd email to BU re PA motion filed	0.20		\$925.00			0.2	185				\$185.00
	4/19/2024	BU	Request to appear remotely for 4/26 hearing to substitute deceased plaintiff and file	1.00		\$790.00								\$790.00
	4/21/2024	KAS	Call with /Texts/calls with C. Lee re agreement and injunction	0.50		\$925.00								\$462.50
	4/21/2024	KAS	Email/call CH re update	0.30		\$925.00								\$277.50
	4/22/2024	KAS	Call with /Texts/calls with C. Lee re agreement terms	1.80		\$925.00								\$1,665.00
	4/22/2024	KAS	Calls with CH re C. Lee settlement agreement talks	0.40		\$925.00								\$370.00
	4/23/2024	BU	Review order granting plaintiff substitution	0.40		\$790.00								\$316.00
	4/23/2024	KAS	Lee Call with /Texts/calls re finalizing terms	0.50		\$925.00								\$462.50
	4/24/2024	KAS	Lee Call with /Texts/calls re settlement agreement	0.60		\$925.00								\$555.00
	4/25/2024	KAS	Call with /Texts/calls with C. Lee re settlement agreement	0.50		\$925.00								\$462.50
	4/25/2024	KAS	Emails CH / Team re status	0.30		\$925.00								\$277.50
	4/27/2024	KAS	Call with /Texts/calls call with C. Lee re finalizing terms	0.70		\$925.00								\$647.50
	4/27/2024	KAS	Emails with CH / Team re same	0.20		\$925.00								\$185.00
	4/27/2024	KAS	Lee Call with /Texts/calls finalizing terms	0.70		\$925.00								\$647.50
	5/1/2024	BU	Review latest iteration of class list and forwarded by Sunrise to CPT Group	0.40		\$790.00								\$316.00
	5/1/2024	BU	Email to CH re reply iso motion for preliminary approval	0.30		\$790.00								\$237.00
	5/3/2024	BU	Phone call with CH re CAFA notice	0.40		\$790.00								\$316.00

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fees	Lodestar Reductions												
						General		CC Confs		Falkenberg		Travel						
Fees						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees					
Total Lodestar			4384.90		\$2,917,615.10													
Lodestar Reductions						Tally		314.3	207241.1	907.9	\$21,562	13.5	\$8,813	56.5	\$40,805			
						Perct		100%	100%	30.00%	30.00%	100.00%	100.00%	50.00%	50.00%			
						Subt		314.3	207241.1	272.37	\$6,468	13.5	\$8,813	28.25	\$20,403			
						Hours		Dollars										
						General		314.3	\$207,241									
						CC Confs		272.37	\$6,468									
						Falkenberg		13.5	\$8,813									
						Travel		28.25	\$20,403									
						Less Reduct	(242924.55)	Total		628.42	\$242,925							
Net Lodestar					\$2,674,690.55													

<u>Costs</u>	<u>Category</u>	<u>Amount</u>
	Experts/Consultants	\$6,190.00
	Depositions	\$9,600.84
	Westlaw/Lexis	\$9,650.57
	Mediation	\$0.00
	Airfare and Related	\$994.99
	Lodging and Related	\$879.94
	Attorney Services	\$17,911.62
	Court/Filing	\$2,503.08
	Ground Transportation	\$314.45
	Litigation Support	\$0.00
	Third Party Copy	\$0.00
		\$0.00
	<i>Total</i>	\$48,045.49

Class Counsel Abbreviation Key

Christopher Healey	CH
David Marks	DM
Guy Wallace	GW
James Thornton	JT
Mark Johnson	MJ
Megan Yarnall	MY
Michael Thamer	MT
Stefanie Warren	SW

SCHNEIDER WALLACE

Schneider Wallace - Lodestar Fees/Costs

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>								
				<u>Worked</u>	<u>Fees</u>		<u>General Hrs</u>	<u>Fees</u>	<u>CC Confs Hrs</u>	<u>Fees</u>	<u>Falkenberg Hrs</u>	<u>Fees</u>	<u>Travel Hrs</u>	<u>Fees</u>	
07/18/2017	Sarah Colby (sxc)	TC KK re possible amendments to complaint	\$888.00	0.30		\$266.40									
07/18/2017	Sarah Colby (sxc)	Emails with EG/GBW/CW re opening case memo for Heredia	\$888.00	0.10		\$88.80									
07/18/2017	Sarah Colby (sxc)	search network for case memo on other RCFE points cases	\$888.00	0.10		\$88.80									
07/20/2017	Sarah Colby (sxc)	Emails and TC JAU re case memo	\$888.00	0.20		\$177.60									
07/21/2017	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Draft case memo	\$888.00	3.20		\$2,841.60									
07/21/2017	Sarah Colby (sxc)	Email info to JAU on case	\$888.00	0.10		\$88.80									
07/21/2017	Sarah Colby (sxc)	review co from oc and emails with co-co re arbitration	\$888.00	0.10		\$88.80									
07/24/2017	Sarah Colby (sxc)	TC KAS/KK/CH re OC's arguments re arbitration and substantive claims	\$888.00	0.30		\$266.40									
07/24/2017	Sarah Colby (sxc)	Review arbitration agreements in clients' contracts in prep for potential arb motion	\$888.00	0.20		\$177.60									
07/24/2017	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Draft case memo	\$888.00	2.40		\$2,131.20									
07/24/2017	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	research prior cases for same	\$888.00	1.00		\$888.00									
7/26/2017	Christopher Walker (CJW)	Confirm Copy Code has been created. Note the need for Postage code. Link co-counsel contact info to the matter in CM. Email request for client contact info from SSC. Enter client contact info in CM and link to the matter.	250	0.50		\$125.00	0.5	\$125.00							
07/26/2017	Sarah Colby (sxc)	TC GBW re arbitration issue	\$888.00	0.10		\$88.80									
07/27/2017	Camella Taylor (CRT)	found related case on pacer, downloaded class cert and all supporting docs and exhibits, created folder within case and saved docs there and posted on producteev	150	0.70		\$105.00	0.7	\$105.00							
07/27/2017	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Conference call with GBW, SSC, K. Stebner, C. Healey, and K. Knapp re class representatives who haven't signed arbitration	\$888.00	0.10		\$88.80									
07/27/2017	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	com's with opposing counsel	\$888.00	0.20		\$177.60									
07/27/2017	Sarah Colby (sxc)	TC co-co re class reps, arbitration issues and injunctive relief	\$888.00	0.30		\$266.40			0.3		266.4				
07/27/2017	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Email GBW and SSC re staffing case	\$888.00	0.10		\$88.80									
07/27/2017	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	create producteev for pulling class cert briefing from Shiferaw v. Sunrise Senior Living Management, Inc	\$888.00	0.10		\$88.80									
07/27/2017	Sarah Colby (sxc)	EMails from JAU and GBW re W&H class action against Sunrise that made understaffing allegations	\$888.00	0.10		\$88.80									
07/27/2017	Guy Wallace (GBW)	com's with co-counsel re arbitration issues and proposed class representatives	\$1,188.00	0.50		\$594.00			0.5		594				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
07/28/2017	Camella Taylor (CRT)	downloaded 12 docs from pacer in realted case (Shiferaw v. Sunrise Senior Living Management) and saved in sub folder in client folder	150	0.40	\$60.00	0.4	\$60.00						
07/28/2017	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review prior class cert brief against Sunrise	\$888.00	0.50	\$444.00								
08/14/2017	Sarah Colby (sxc)	TC KK re potential class representatives	\$888.00	0.30	\$266.40								
08/22/2017	Sarah Colby (sxc)	TC KAS et al re meeting with OC	\$888.00	0.20	\$177.60								
09/29/2017	Sarah Colby (sxc)	emails with co-co re settlement meeting with OC	\$888.00	0.10	\$88.80								
10/06/2017	Sarah Colby (sxc)	Review CMC statement	\$888.00	0.10	\$88.80								
10/06/2017	Sarah Colby (sxc)	Emails with KK/GBW re status of case	\$888.00	0.20	\$177.60								
10/09/2017	Sarah Colby (sxc)	TC KK re complex case designation issues/pleadings (.2)	\$888.00	0.20	\$177.60								
10/09/2017	Sarah Colby (sxc)	review rule	\$888.00	0.10	\$88.80								
10/09/2017	Sarah Colby (sxc)	emails with co-co re same	\$888.00	0.10	\$88.80								
10/17/2017	Sarah Colby (sxc)	Emails with co-co re settlement meeting	\$888.00	0.10	\$88.80								
10/17/2017	Sarah Colby (sxc)	email from KK re photos from client	\$888.00	0.10	\$88.80								
11/14/2017	Sarah Colby (sxc)	TC KK re meeting with OC and staffing info	\$888.00	0.20	\$177.60								
11/16/2017	Sarah Colby (sxc)	email from CH re oc response to informal discovery requests and proposed response	\$888.00	0.10	\$88.80								
12/06/2017	Sarah Colby (sxc)	Emails with co-co re end of settlement negotiations/plan going forward	\$888.00	0.10	\$88.80								
12/13/2017	Sarah Colby (sxc)	TC co-co re FAC/arbitration/class reps/etc;	\$888.00	0.50	\$444.00			0.5		444			
12/13/2017	Sarah Colby (sxc)	review emails from co-co re same			\$0.00								
12/13/2017	Guy Wallace (GBW)	com's with co-counsel re potential amendment of complaint	\$1,188.00	0.60	\$712.80			0.6		712.8			
12/14/2017	Sarah Colby (sxc)	Emails from and to co-counsel re next steps	\$888.00	0.10	\$88.80								
12/14/2017	Sarah Colby (sxc)	TC GBW re same	\$888.00	0.10	\$88.80								
12/18/2017	Sarah Colby (sxc)	CW GBW re next steps	\$888.00	0.20	\$177.60								
01/30/2018	Sarah Colby (sxc)	Email from CH re removal; review initial CMC; check files and staff for service of notice of removal	\$888.00	0.10	\$88.80								
01/30/2018	Sarah Colby (sxc)	email co-co re no notice	\$888.00	0.10	\$88.80								
01/30/2018	Sarah Colby (sxc)	CW GBW re removal/defense strategy/misrepresentations	\$888.00	0.20	\$177.60								
02/01/2018	Guy Wallace (GBW)	review and analysis of D's notices of appearances and objection to MJ Laporte	\$1,188.00	0.20	\$237.60								
02/01/2018	Sarah Colby (sxc)	CW GBW re re-assignment and case evidence	\$888.00	0.10	\$88.80								
02/02/2018	Guy Wallace (GBW)	review and analysis of assignment to J. Gilliam	\$1,188.00	0.10	\$118.80								
02/02/2018	Guy Wallace (GBW)	com's with CJH;SC re same	\$1,188.00	0.20	\$237.60								
02/05/2018	Sarah Colby (sxc)	Quick review of motions filed by Sunrise; email GBW re same	\$888.00	0.10	\$88.80								
02/05/2018	Sarah Colby (sxc)	Review memo re arbitration; emails from KAS re same	\$888.00	0.20	\$177.60								
02/06/2018	Sarah Colby (sxc)	CW GBW re Sunrise motions	\$888.00	0.10	\$88.80								
02/06/2018	Sarah Colby (sxc)	emails from and to co-co re sunrise motions	\$888.00	0.10	\$88.80								
02/06/2018	Sarah Colby (sxc)	CW KAS re arb motion and MTD	\$888.00	0.30	\$266.40								
02/06/2018	Sarah Colby (sxc)	Emails from co-co re D's motion to compel arb and MTD	\$888.00	0.10	\$88.80								
02/06/2018	Guy Wallace (GBW)	review and analysis of D's motion to compel arbitration and motion to dismiss;	\$1,188.00	0.50	\$594.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General Hrs	Fees	CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees	
02/06/2018	Guy Wallace (GBW)	com's with co-counsel re same	\$1,188.00	0.20		\$237.60									
02/07/2018	Guy Wallace (GBW)	tc with KAS; KJK; CJH; TN re D's MCA and MTD	\$1,188.00	0.40		\$475.20									
02/07/2018	Guy Wallace (GBW)	review and analysis of D's MCA/MTD; KJK memo re arbitration agreements	\$1,188.00	1.00		\$1,188.00									
02/07/2018	Guy Wallace (GBW)	SC email re same	\$1,188.00	0.20		\$237.60									
02/08/2018	Guy Wallace (GBW)	com's with CJH; SC re schedule on D's dispositive motions	\$1,188.00	0.20		\$237.60									
02/16/2018	Sarah Colby (sxc)	Email from CH re FAC; CW GBW re claims	\$888.00	0.20		\$177.60									
02/16/2018	Sarah Colby (sxc)	Review class rep declaration re arb motion	\$888.00	0.10		\$88.80									
02/16/2018	Sarah Colby (sxc)	emails from co-co re same	\$888.00	0.10		\$88.80									
02/20/2018	Sarah Colby (sxc)	emails from co-co and email to GBW re amended complaint and MTD/MTC schedule	\$888.00	0.10		\$88.80									
02/22/2018	Guy Wallace (GBW)	review and analysis of draft FAC	\$1,188.00	2.00		\$2,376.00									
02/22/2018	Guy Wallace (GBW)	revise and edit same	\$1,188.00	0.20		\$237.60									
02/22/2018	Guy Wallace (GBW)	com's with KAS; CJH; SC re draft FAC and revisions to same	\$1,188.00	1.10		\$1,306.80									
02/22/2018	Sarah Colby (sxc)	Review/edit FAC	\$888.00	1.80		\$1,598.40									
02/22/2018	Sarah Colby (sxc)	TC KK re FAC allegations	\$888.00	0.40		\$355.20									
02/22/2018	Sarah Colby (sxc)	TC GBW x 4 re FAC allegations	\$888.00	0.40		\$355.20									
02/22/2018	Sarah Colby (sxc)	emails GBW re same	\$888.00	0.20		\$177.60									
02/23/2018	Sarah Colby (sxc)	Email to co-counsel re FAC	\$888.00	0.10		\$88.80									
02/23/2018	Sarah Colby (sxc)	emails from OC re FAC and motion deadlines	\$888.00	0.10		\$88.80									
02/23/2018	Guy Wallace (GBW)	com's with Chicotel; KAS; CJH; SC re FAC	\$1,188.00	0.30		\$356.40									
02/26/2018	Sarah Colby (sxc)	Email from CH re MTD/early resolution	\$888.00	0.10		\$88.80									
04/12/2018	Sarah Colby (sxc)	email from and to JCE re class rep and mtc arb	\$888.00	0.10		\$88.80									
04/19/2018	Guy Wallace (GBW)	com's with CJH; GK; SC re D's motion to dismiss and P's opposition thereto; P's Initial Disclosures	\$1,188.00	0.50		\$594.00									
04/19/2018	Guy Wallace (GBW)	review and analysis of draft opposition to D's motion to dismiss	\$1,188.00	1.20		\$1,425.60									
04/19/2018	Sarah Colby (sxc)	Review/edit opp to MTD	\$888.00	0.50		\$444.00									
04/19/2018	Sarah Colby (sxc)	TC co-co re opp to MTD	\$888.00	0.30		\$266.40			0.3		266.4				
04/20/2018	Guy Wallace (GBW)	revise and edit draft opposition to D's motion to dismiss	\$1,188.00	1.70		\$2,019.60									
04/20/2018	Sarah Colby (sxc)	Review/edit opp to MTD	\$888.00	2.60		\$2,308.80									
04/21/2018	Guy Wallace (GBW)	review and analysis of draft of opposition to D's MTD	\$1,188.00	0.60		\$712.80									
04/21/2018	Guy Wallace (GBW)	legal research and analysis re same	\$1,188.00	0.50		\$594.00									
04/22/2018	Guy Wallace (GBW)	revise and edit draft of opposition to D's 12(b)(6)	\$1,188.00	1.70		\$2,019.60									
04/23/2018	Sarah Colby (sxc)	Review/edit opp to MTD	\$888.00	0.30		\$266.40									
04/23/2018	Sarah Colby (sxc)	email to CH re same	\$888.00	0.20		\$177.60									
04/23/2018	Sarah Colby (sxc)	CW GBW re opp to MTD	\$888.00	0.10		\$88.80									
04/23/2018	Sarah Colby (sxc)	Review JCE's edits/comments to opp to MTD	\$888.00	0.10		\$88.80									
04/23/2018	Sarah Colby (sxc)	email co-co re same	\$888.00	0.10		\$88.80									
04/23/2018	Sarah Colby (sxc)	TC GBW re opp to MTD	\$888.00	0.10		\$88.80									
04/23/2018	Guy Wallace (GBW)	revise and edit draft of opposition to D's 12(b)(6)	\$1,188.00	2.10		\$2,494.80									
04/23/2018	Guy Wallace (GBW)	com's with SC re same (.3)	\$1,188.00	0.30		\$356.40									
04/24/2018	Sarah Colby (sxc)	TC CH re initial disclosures	\$888.00	0.20		\$177.60									
04/26/2018	Sarah Colby (sxc)	TC co-co prep for meeting with C. Lee	\$888.00	0.20		\$177.60			0.2		177.6				
04/26/2018	Sarah Colby (sxc)	Review dates and email GBW re initial disclosures	\$888.00	0.10		\$88.80									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General		CC Confs		Falkenberg		Travel	
							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
04/27/2018	Sarah Colby (sxc)	Review initial disclosure requirement	\$888.00	0.10		\$88.80								
04/27/2018	Sarah Colby (sxc)	cw gbw re same	\$888.00	0.10		\$88.80								
04/27/2018	Sarah Colby (sxc)	emails with co-co re same	\$888.00	0.10		\$88.80								
04/30/2018	Sarah Colby (sxc)	Review/edit opp to MTD/MTC arb	\$888.00	0.80		\$710.40								
05/02/2018	Sarah Colby (sxc)	Draft initial disclosures (includes research)	\$888.00	2.20		\$1,953.60								
05/02/2018	Sarah Colby (sxc)	Emails with co-counsel re initial disclosures, including reviewing memos and charts re same	\$888.00	0.50		\$444.00								
05/14/2018	Sarah Colby (sxc)	CW GBW re rule 26 conference	\$888.00	0.10		\$88.80								
05/14/2018	Sarah Colby (sxc)	CW GBW re rule 26f conf	\$888.00	0.10		\$88.80								
05/15/2018	Sarah Colby (sxc)	Review email memo from CH re rule 26f conference	\$888.00	0.10		\$88.80								
05/15/2018	Guy Wallace (GBW)	com's with Brass; CJH re Rule 26 meet and confer; preparation for initial CMC and proposed case schedule	\$1,188.00	0.80		\$950.40								
05/21/2018	Sam Marks (STM)	Rec'd: D's Reply ISO MTC Arbitration or to Dismiss Pursuant to FRCP 12b3, or to Transfer Venue Pursuant to 28 USC 1404(A) or to Dismiss Pursuant to FRCP 12b6 and 9b or to stay [Doc 34] 180521; Decl of Lynn Chalk ISO D's Mtn to Transfer [Doc 34-1] 180521; Suppl Decl of Rachel S Brass ISO D's Mtn to Compel Arbitration, Dismiss, Transfer or Stay [Doc 34-2] 180521; Exh A to Suppl Decl of Rachel S Brass ISO D's Mtn to Compel Arbitration, Dismiss, Transfer or Stay [Doc 34-3] 180521; Exh B to Suppl Decl of Rachel S Brass ISO D's Mtn to Compel Arbitration, Dismiss, Transfer or Stay [Doc 34-4] 180521	\$300.00	0.10		\$30.00	0.1	\$30.00						
05/21/2018	Sam Marks (STM)	Rec'd: D's Reply ISO MTC Arbitration or to Dismiss Pursuant to FRCP 12b3, or to Transfer Venue Pursuant to 28 USC 1404(A) or to Dismiss Pursuant to FRCP 12b6 and 9b or to stay [Doc 34] 180521; Decl of Lynn Chalk ISO D's Mtn to Transfer [Doc 34-1] 180521; Suppl Decl of Rachel S Brass ISO D's Mtn to Compel Arbitration, Dismiss, Transfer or Stay [Doc 34-2] 180521; Exh A to Suppl Decl of Rachel S Brass ISO D's Mtn to Compel Arbitration, Dismiss, Transfer or Stay [Doc 34-3] 180521; Exh B to Suppl Decl of Rachel S Brass ISO D's Mtn to Compel Arbitration, Dismiss, Transfer or Stay [Doc 34-4] 180521	\$300.00	0.10		\$30.00	0.1	\$30.00						
05/21/2018	Sam Marks (STM)	Rec'd: D's Reply ISO MTC Arbitration or to Dismiss Pursuant to FRCP 12b3, or to Transfer Venue Pursuant to 28 USC 1404(A) or to Dismiss Pursuant to FRCP 12b6 and 9b or to stay [Doc 34] 180521; Decl of Lynn Chalk ISO D's Mtn to Transfer [Doc 34-1] 180521; Suppl Decl of Rachel S Brass ISO D's Mtn to Compel Arbitration, Dismiss, Transfer or Stay [Doc 34-2] 180521; Exh A to Suppl Decl of Rachel S Brass ISO D's Mtn to Compel Arbitration, Dismiss, Transfer or Stay [Doc 34-3] 180521; Exh B to Suppl Decl of Rachel S Brass ISO D's Mtn to Compel Arbitration, Dismiss, Transfer or Stay [Doc 34-4] 180521	\$300.00	0.10		\$30.00	0.1	\$30.00						
05/24/2018	Sarah Colby (sxc)	Emails re CMC statement with CH	\$888.00	0.10		\$88.80								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
							Hrs		Hrs		Hrs		Hrs		
05/30/2018	Guy Wallace (GBW)	preparation and drafting of CMC statement	\$1,188.00	2.40		\$2,851.20									
06/06/2018	Guy Wallace (GBW)	review and analysis of D's reply brief re motion to dismiss; P's FAC	\$1,188.00	1.10		\$1,306.80									
06/06/2018	Guy Wallace (GBW)	com's with CJH; SC re preparation for hearing re same	\$1,188.00	0.20		\$237.60									
06/07/2018	Sarah Colby (sxc)	Emails from CH re hearing	\$888.00	0.10		\$88.80									
06/13/2018	Sarah Colby (sxc)	Review Ds letter to court re authorities on MTD	\$888.00	0.10		\$88.80									
06/28/2018	Sarah Colby (sxc)	CW GBW/SM re hearing transcript	\$888.00	0.10		\$88.80									
07/02/2018	Sarah Colby (sxc)	Emails with SM/co-co re hearing transcript	\$888.00	0.10		\$88.80									
07/19/2018	Sarah Colby (sxc)	TC co-co re amending complaint/discovery	\$888.00	0.10		\$88.80			0.1		88.8				
11/01/2018	Sarah Colby (sxc)	Emails from and to CH/MT/KAS/GBW re division of C.D.	\$888.00	0.10		\$88.80									
11/01/2018	Sarah Colby (sxc)	review letter from D re Southern Division	\$888.00	0.10		\$88.80									
11/01/2018	Sarah Colby (sxc)	CW GBW re same	\$888.00	0.10		\$88.80									
11/01/2018	Sarah Colby (sxc)	review of bench in C.D.	\$888.00	0.10		\$88.80									
12/07/2018	Sarah Colby (sxc)	TC TN/CH re Motion to Strike/arb proposed by Sunrise and our response	\$888.00	0.70		\$621.60									
12/07/2018	Sarah Colby (sxc)	LR on issue of arbitration/MTS Sunrise is planning to bring in prep for call with TN/CH (includes review of agreements)	\$888.00	1.50		\$1,332.00									
12/07/2018	Sarah Colby (sxc)	LR for TN re unconscionability and email to TN	\$888.00	0.40		\$355.20									
12/07/2018	Sarah Colby (sxc)	Emails from and to CH outlining CW with OC re arbitration/MTS	\$888.00	0.10		\$88.80									
12/07/2018	Sarah Colby (sxc)	Email from CH re claim splitting issue	\$888.00	0.10		\$88.80									
12/11/2018	Sarah Colby (sxc)	Emails with CH/TN re arbitration and class def issues	\$888.00	0.10		\$88.80									
12/26/2018	Sarah Colby (sxc)	Drafting case transfer memo	\$888.00	0.30		\$266.40									
01/11/2019	Travis Close (TCC)	Review complaint and Ds mtn to dismiss; Review case files and essential contacts for compiling fact/reference sheet	\$888.00	0.70		\$621.60									
01/16/2019	Travis Close (TCC)	Prepare/revise notice of appearance	\$888.00	0.20		\$177.60									
01/22/2019	Guy Wallace (GBW)	revise and analysis of SC memo re MTS class allegations	\$1,188.00	0.50		\$594.00									
01/22/2019	Guy Wallace (GBW)	com's with Healey; SC re arbitration issues and class definition	\$1,188.00	0.20		\$237.60									
02/07/2019	Guy Wallace (GBW)	review and analysis of draft oppositions to D's motion to dismiss and motion to strike class allegations	\$1,188.00	2.40		\$2,851.20									
02/07/2019	Guy Wallace (GBW)	revise and edit same	\$1,188.00	2.40		\$2,851.20									
02/15/2019	Travis Close (TCC)	Review Ds reply iso motion to strike class allegations	\$888.00	0.20		\$177.60									
02/15/2019	Guy Wallace (GBW)	review and analysis of D's reply re motion to strike class allegations and legal research and analysis re argument re arbitration agreements	\$1,188.00	3.10		\$3,682.80									
02/19/2019	Travis Close (TCC)	Review joint rule 26(f) report and discovery plan filed by plaintiffs	\$888.00	0.20		\$177.60									
02/27/2019	Guy Wallace (GBW)	com's with CJH re D's motion to strike and hearing re same	\$1,188.00	0.40		\$475.20									
03/04/2019	Travis Close (TCC)	Review judge's order denying motion to dismiss and motion to strike	\$888.00	0.30		\$266.40									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
03/04/2019	Guy Wallace (GBW)	review and analysis of Order from J. Staton denying D's pleading motions	\$1,188.00	0.20							
03/04/2019	Guy Wallace (GBW)	com with CJH re same	\$1,188.00	0.20							
04/05/2019	Guy Wallace (GBW)	review and analysis of Rule 26(f) report and proposed schedule	\$1,188.00	0.30							
04/05/2019	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20							
04/08/2019	Sam Marks (STM)	Draft, file ntc of address/firm change for SSC	\$300.00	0.80		0.8	\$240.00				
05/13/2019	Guy Wallace (GBW)	legal research and analysis re D's position that discovery should be limited to the facilities used by the named P's	\$1,188.00	2.40							
05/24/2019	Guy Wallace (GBW)	tc with CJH; KAS; MT; TN; Co-counsel re discovery and class certification issues	\$1,188.00	0.50				0.5		594	
05/29/2019	Linda Currid (LZC)	reviewing email from One Legal with file endorsed copies of motion. Forward to mail for processing.	\$300.00	0.10		0.1	\$30.00				
06/10/2019	Guy Wallace (GBW)	review and analysis of draft of amended complaint	\$1,188.00	0.70							
06/11/2019	Guy Wallace (GBW)	review and analysis of draft of SAC	\$1,188.00	1.10							
06/14/2019	Guy Wallace (GBW)	com's with CJH re discovery issues and analysis of arbitration and class members issue	\$1,188.00	0.30							
07/16/2019	Lourdes Castro (LEC)	Finalizing and filing NOA for MTJ	450	0.50		0.5	\$225.00				
07/16/2019	Lourdes Castro (LEC)	Preparing NOA and NOW for MTJ and JAU	450	1.10		1.1	\$495.00				
07/17/2019	Lourdes Castro (LEC)	finalizing and filing NOW for JAU	450	0.30		0.3	\$135.00				
07/25/2019	Travis Close (TCC)	Call with co-counsel re: doc production, depos, & litigation strategy	\$888.00	0.40				0.4		355.2	
07/29/2019	Guy Wallace (GBW)	revise and edit draft motion to compel	\$1,188.00	2.00							
07/29/2019	Guy Wallace (GBW)	com's with CJH and MTJ re same	\$1,188.00	0.30							
08/07/2019	Emma Sturdevant (ELS)	Rec'd: Records Request Form from First Legal 190708	200	0.10		0.1	\$20.00				
08/14/2019	Lourdes Castro (LEC)	working on drafting subpoenas	450	1.90		1.9	\$855.00				
08/15/2019	Mark Johnson (MTJ)	com w/ C. Healey re approach on meeting and conferring on 2nd and third set of document requests.	\$888.00	0.20							
08/15/2019	Mark Johnson (MTJ)	review and prepare analysis of D's responses to 2nd and thirrd document requests	\$888.00	2.00							
08/16/2019	Mark Johnson (MTJ)	call w/ COC Bob C. re background on meet and confer efforts w/r/t 1st set of doc requests and rogs; strategy for meeting and conferring on 2nd set of rfps, status and issues re protective order	\$888.00	0.60							
08/16/2019	Mark Johnson (MTJ)	review prior meet and confer letter and joint stipulation as background for meet and confer ltr on 2nd set of rfps and rogs.	\$888.00	0.50							
09/25/2019	Abigail Laudick (AXL)	Reviewed ESI stipulation and added comments and redlines. Sent to MTJ for final review.	680	0.80		0.8	\$544.00				
09/25/2019	Mark Johnson (MTJ)	review and revise ESI protool	\$888.00	2.70							
09/25/2019	Mark Johnson (MTJ)	mtgs (x2) with AML re same and review other samples for comparison	\$888.00	1.00							
09/26/2019	Abigail Laudick (AXL)	Comm with cc re changes to ESI protocol with Defendants.	680	0.20		0.2	\$136.00				
09/26/2019	Mark Johnson (MTJ)	revise and finalized redline and clean copies of proposed ESI stip and order	\$888.00	0.60							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
09/26/2019	Mark Johnson (MTJ)	email exchange w/ COC Cocchia re revisions to stip and order on ESI protocol	\$888.00	0.10		\$88.80									
09/26/2019	Mark Johnson (MTJ)	continue working on meet and confer ltr re second set of document requests.	\$888.00	0.80		\$710.40									
09/27/2019	Guy Wallace (GBW)	review and analysis of supplemental discovery brief filed by Defendants	\$1,188.00	0.50		\$594.00									
09/27/2019	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20		\$237.60									
10/01/2019	Mark Johnson (MTJ)	finalize draft meet and confer ltr re second set of rpd's	\$888.00	1.70		\$1,509.60									
10/01/2019	Mark Johnson (MTJ)	additional research and review of responses for same	\$888.00	1.00		\$888.00									
10/01/2019	Mark Johnson (MTJ)	draft email to R Cocchia re meet and confer ltr on 2nd set of doc requests	\$888.00	0.10		\$88.80									
10/11/2019	Abigail Laudick (AXL)	Comm with MTJ re new document production and issues with link provided by Def to access documents.	680	0.30		\$204.00	0.3	\$204.00							
10/18/2019	Abigail Laudick (AXL)	Received new document production from Def. Downloaded, unzipped and saved to case file.	680	0.40		\$272.00	0.4	\$272.00							
10/18/2019	Abigail Laudick (AXL)	Comm with cc re access to new document production from Defendants.	680	0.30		\$204.00	0.3	\$204.00							
10/29/2019	Abigail Laudick (AXL)	Received comm re document production. Tried to use the link provided and drafted email discussing issues with downloading the production.	680	0.30		\$204.00	0.3	\$204.00							
11/14/2019	Abigail Laudick (AXL)	Received new document production from Def. Created login credentials for share file site, downloaded and saved to case file. Saved credentials to casemanager.	680	0.60		\$408.00	0.6	\$408.00							
11/15/2019	Guy Wallace (GBW)	com's with CJH; MTJ re discovery and preparation for class certification and schedule re same	\$1,188.00	0.40		\$475.20									
11/15/2019	Mark Johnson (MTJ)	call w/ COC re status and strategy on motion to compel; document review and recent production from Ds of SDD docs, scheduling depositions of GMs for P's residences,	\$888.00	0.30		\$266.40									
11/19/2019	Abigail Laudick (AXL)	Organized and uploaded all productions received in this case to FTP site with JND to create a workspace in Relativity.	680	0.40		\$272.00	0.4	\$272.00							
11/19/2019	Mark Johnson (MTJ)	review, analyze and prepare comments on latest version of draft proposed ESI stipulation.	\$888.00	1.00		\$888.00									
11/19/2019	Mark Johnson (MTJ)	emails w/ Healey and Cocchia re draft redlined ESI protocol from defendants and responses, assuming responsibility going forward for negotiations.	\$888.00	0.20		\$177.60									
11/19/2019	Mark Johnson (MTJ)	coms w/ OC A Allyn re scheduling call to discuss ESI protocol	\$888.00	0.10		\$88.80									
11/19/2019	Mark Johnson (MTJ)	coms w/ AML re technical issues related to document production for analyzing draft ESI protocol	\$888.00	0.40		\$355.20									
11/20/2019	Mark Johnson (MTJ)	meet and confer w/ OC Ashley Allyn re ESI stipulation	\$888.00	0.40		\$355.20									
11/20/2019	Mark Johnson (MTJ)	draft redline responsive version of proposed ESI stipulation and Order and email cover to OC for same	\$888.00	0.60		\$532.80									
11/26/2019	Abigail Laudick (AXL)	Received new document production from Def. Downloaded and saved to case file. Sent to JND to upload to Relativity for review.	680	0.50		\$340.00	0.5	\$340.00							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
12/02/2019	Guy Wallace (GBW)	revise and edit draft of MTC to be submitted to J. Early re discovery disputes	\$1,188.00	1.40			\$1,663.20				
12/02/2019	Guy Wallace (GBW)	com's with CJH; MTJ re same	\$1,188.00	0.20			\$237.60				
12/02/2019	Mark Johnson (MTJ)	review and edit draft motion to compel multiple categories of discovery	\$888.00	1.70			\$1,509.60				
12/02/2019	Mark Johnson (MTJ)	com w/ COC re same	\$888.00	0.10			\$88.80				
12/03/2019	Abigail Laudick (AXL)	Comm with cc re access to case on Relativity. Filed request with JND.	680	0.20			\$136.00	0.2	\$136.00		
12/03/2019	Abigail Laudick (AXL)	Made changes to the case workspace in Relativity for easier review and exported index of current defendant document productions.	680	0.40			\$272.00	0.4	\$272.00		
12/03/2019	Mark Johnson (MTJ)	team call re document management, discovery, depositions, class cert planning	\$888.00	0.40			\$355.20		0.4	355.2	
12/03/2019	Mark Johnson (MTJ)	com w/ AML re docs in relativity, preparation of index, available metadata and co-counsel access to docs	\$888.00	0.50			\$444.00				
12/03/2019	Mark Johnson (MTJ)	review index of document production from Relativity	\$888.00	0.10			\$88.80				
12/03/2019	Mark Johnson (MTJ)	draft email to COC re same and issues with metadata, bates numbering	\$888.00	0.20			\$177.60				
12/03/2019	Mark Johnson (MTJ)	follow up email to OC Ashley Allyn re ESI protocol	\$888.00	0.10			\$88.80				
12/03/2019	Guy Wallace (GBW)	tc with CJH; MT; BU; MTJ re motion to compel; D's document production; schedule on class certification	\$1,188.00	0.30			\$356.40				
12/04/2019	Abigail Laudick (AXL)	Comm with cc re access to case on Relativity.	680	0.10			\$68.00	0.1	\$68.00		
12/04/2019	Abigail Laudick (AXL)	Received additional Bates stamped documents from cc for upload to Relativity. Downloaded and sent to JND for upload to Relativity.	680	0.60			\$408.00	0.6	\$408.00		
12/04/2019	Abigail Laudick (AXL)	Received discovery work product from cc for case file. Created folders for organization and saved files to our system.	680	0.50			\$340.00	0.5	\$340.00		
12/04/2019	Abigail Laudick (AXL)	Reviewed request from cc for export of all documents in Relativity with index included. Downloaded all documents as PDFs and created index. Uploaded file to share file site.	680	0.70			\$476.00	0.7	\$476.00		
12/04/2019	Abigail Laudick (AXL)	Reviewed document index by cc for first two document productions from Def. Transferred notes into coding panel on Relativity from index.	680	1.70			\$1,156.00	1.7	\$1,156.00		
12/04/2019	Lourdes Castro (LEC)	putting doc in pleading paper	450	0.70			\$315.00	0.7	\$315.00		
12/04/2019	Mark Johnson (MTJ)	prepare revised redline version of ESI stip and proposed order, accepting prior redline and making additional changes	\$888.00	0.10			\$88.80				
12/04/2019	Mark Johnson (MTJ)	com w/ OC re same	\$888.00	0.20			\$177.60				
12/04/2019	Mark Johnson (MTJ)	review and communicate acceptance of additional changes to ESI stip and proposed order	\$888.00	0.10			\$88.80				
12/04/2019	Mark Johnson (MTJ)	review joint statement re protective order filed with the court.	\$888.00	0.20			\$177.60				
12/04/2019	Mark Johnson (MTJ)	multiple emails w/ CJH, R Cocchia, Umpierre and AML re index of document production, integration of same w/ relativity; access to relativity	\$888.00	0.40			\$355.20				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions					
				Worked			General	CC Confs	Falkenberg	Travel		
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees
12/04/2019	Mark Johnson (MTJ)	mtg w/ AML rre status of doc production and integration of prior production into relativity, merging of document index with CJH index and notes on documents	\$888.00	0.20		\$177.60						
12/04/2019	Mark Johnson (MTJ)	review email from CJH re decisions in other Sunrise cases (wage and hour cases) with info relating to staffing process	\$888.00	0.20		\$177.60						
12/05/2019	Abigail Laudick (AXL)	Comm with CC re document review coding panel. Exported coding panel for three similar assisted living cases to send to cc to facilitate building coding panel for document review in this case.	680	0.40		\$272.00	0.4	\$272.00				
12/05/2019	Abigail Laudick (AXL)	Reviewed and split up large PDFs produced by Defendants into individual documents to facilitate document review. Split SUN000001-351.	680	0.50		\$340.00	0.5	\$340.00				
12/05/2019	Abigail Laudick (AXL)	Reviewed and split up large PDFs produced by Defendants into individual documents to facilitate document review. Split SUN000001-351.	680	1.70		\$1,156.00	1.7	\$1,156.00				
12/05/2019	Mark Johnson (MTJ)	follow-up email exchange w/ COC re document production indices and integration with Relativity	\$888.00	0.10		\$88.80						
12/06/2019	Abigail Laudick (AXL)	Reviewed and split up large PDFs produced by Defendants into individual documents to facilitate document review. Split SUN000352-687.	680	1.50		\$1,020.00	1.5	\$1,020.00				
12/06/2019	Abigail Laudick (AXL)	Reviewed and split up large PDFs produced by Defendants into individual documents to facilitate document review. Split SUN000688-921.	680	0.90		\$612.00	0.9	\$612.00				
12/09/2019	Abigail Laudick (AXL)	Reviewed and split up large PDFs produced by Defendants into individual documents to facilitate document review. Split SUN000922-1796.	680	1.70		\$1,156.00	1.7	\$1,156.00				
12/09/2019	Abigail Laudick (AXL)	Imported document title and description into Relativity for documents indexed by cc. SUN001121-1796.	680	1.60		\$1,088.00	1.6	\$1,088.00				
12/12/2019	Mark Johnson (MTJ)	call w/ COC B. Umpiere re search term development and strategy, format	\$888.00	0.40		\$355.20						
12/13/2019	Mark Johnson (MTJ)	call w/ B Umpierre and B Cocchia re search terms and custodians for ESI and strategy for meeting and conferring	\$888.00	0.70		\$621.60						
12/15/2019	Mark Johnson (MTJ)	continue editing, revising proposed search terms for each rpd	\$888.00	2.50		\$2,220.00						
12/16/2019	Abigail Laudick (AXL)	Received new document production from Def. Downloaded, unzipped and saved to case folder. Sent to JND for upload to Relativity for review.	680	0.50		\$340.00	0.5	\$340.00				
12/19/2019	Emma Sturdevant (ELS)	Rec'd: NOA for Stefanie Warren counsel for Plaintiffs [Doc 106] 191219	200	0.10		\$20.00	0.1	\$20.00				
12/19/2019	Emma Sturdevant (ELS)	Rec'd: NOA for Stefanie Warren counsel for Plaintiffs [Doc 106] 191219	200	0.10		\$20.00	0.1	\$20.00				
12/19/2019	Mark Johnson (MTJ)	review comments from CH on email demand re search terms	\$888.00	0.10		\$88.80						
12/19/2019	Mark Johnson (MTJ)	revise and send same	\$888.00	0.10		\$88.80						
12/20/2019	Mark Johnson (MTJ)	review correspondence re expert depositions and document production	\$888.00	0.10		\$88.80						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions					
				Worked			General	CC Confs	Falkenberg	Travel		
<u>Fees</u>						Hrs	Fees	Hrs	Fees	Hrs	Fees	
01/02/2020	Abigail Laudick (AXL)	Received new document production from Defendants. Downloaded, unzipped, and saved production to client folder. Sent to JND for upload to Relativity for review.	\$680.00	0.50		\$340.00	0.50	340.00				
01/02/2020	Abigail Laudick (AXL)	Reviewed stats of new document production from Defendants. Exported index from Relativity and sent to CC for review.	\$680.00	0.60		\$408.00	0.6	408.00				
01/03/2020	Abigail Laudick (AXL)	Exported from Relativity and filled in an index of all Sunrise productions. Sent to cc for review.	\$680.00	1.20		\$816.00	1.2	816.00				
01/07/2020	Abigail Laudick (AXL)	Received new document production. Downloaded, unzipped and saved to case file. Sent to JND for upload to Relativity.	\$680.00	0.30		\$204.00	0.3	\$816.00				
01/08/2020	Abigail Laudick (AXL)	Ran searches using terms for upcoming deposition. Sent results to CC.	\$680.00	1.10		\$748.00	1.1	\$748.00				
01/09/2020	Abigail Laudick (AXL)	Comm with CC re coding issues in Relativity workspace.	\$680.00	0.20		\$136.00	0.2	\$136.00				
01/09/2020	Guy Wallace (GBW)	revise and edit supplemental brief re MTC re resident evaluation and staffing information	\$1,188.00	0.60		\$712.80						
1/9/2020	Guy Wallace (GBW)	review and analysis of D's supplemental brief re same issues	\$1,188.00	0.50		\$594.00						
01/09/2020	Mark Johnson (MTJ)	com w/ AML re document production uploading, volume, credentials and document review	\$888.00	0.20		\$177.60						
01/15/2020	Mark Johnson (MTJ)	com w/ GBW re e-discovery issue and co-counsel call	\$888.00	0.10		\$88.80			0.1	88.8		
01/15/2020	Guy Wallace (GBW)	com's with CJH; KAS; BU; MY; MTJ re discovery and preparation for motion for class certification	\$1,188.00	0.70		\$831.60						
01/15/2020	Guy Wallace (GBW)	legal research and analysis re class certification decisions by J. Staton	\$1,188.00	0.60		\$712.80						
01/16/2020	Abigail Laudick (AXL)	Comm with cc re document review in Relativity.	\$680.00	0.40		\$272.00	0.4	\$831.60				
01/16/2020	Abigail Laudick (AXL)	Received new document production from Def. Downloaded, unzipped and saved to case file. Sent to JND for upload to Relativity.	\$680.00	0.50		\$340.00	0.5	\$712.80				
01/21/2020	Guy Wallace (GBW)	com's with BU re deposition schedule and preparation of P's for same	\$1,188.00	0.20		\$237.60						
01/22/2020	Abigail Laudick (AXL)	Received new document production from Def. Downloaded, unzipped and saved to case file. Sent to JND for upload to Relativity.	\$680.00	0.40		\$272.00	0.4	\$272.00				
01/23/2020	Abigail Laudick (AXL)	Comm with cc re new document production.	\$680.00	0.20		\$136.00	0.2	\$136.00				
01/31/2020	Travis Close (TCC)	Find docs for depo prep of Elise Ganz for GBW	\$888.00	1.30		\$1,154.40						
01/31/2020	Travis Close (TCC)	Review court's order re: Ps motion to compel discovery	\$888.00	0.50		\$444.00						
01/31/2020	Travis Close (TCC)	Search for/Review files on Helen / Elise Gatz in prep for next week's deposition	\$888.00	1.50		\$1,332.00						
01/31/2020	Guy Wallace (GBW)	com's with BU; TCC re preparation for depositions of proposed class representatives	\$1,188.00	0.40		\$475.20						
01/31/2020	Guy Wallace (GBW)	review and analysis of discovery Order from MJ Early	\$1,188.00	0.40		\$475.20						
02/02/2020	Guy Wallace (GBW)	preparation for deposition of Ganz, review of documents re same, and preparation of notes re questions that Defendants may ask Ganz	\$1,188.00	3.20		\$3,801.60						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions									
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees		
							Hrs		Hrs		Hrs		Hrs		Hrs	
02/03/2020	Travis Close (TCC)	Meet w/ GBW, Brian, and plaintiff Elize to prepare for defending depo	\$888.00	4.80		\$4,262.40										
02/03/2020	Mark Johnson (MTJ)	review OC response to questions re document production status in response to specific requests	\$888.00	0.10		\$88.80										
02/03/2020	Mark Johnson (MTJ)	review index of latest document production	\$888.00	0.20		\$177.60										
02/03/2020	Guy Wallace (GBW)	prepare to meet with Elise Ganz re depo prep	\$1,188.00	0.70		\$831.60										
02/03/2020	Guy Wallace (GBW)	com's with BU re same	\$1,188.00	0.20		\$237.60										
02/03/2020	Guy Wallace (GBW)	meet with Ganz and BU re preparation for deposition	\$1,188.00	4.50		\$5,346.00										
02/04/2020	Guy Wallace (GBW)	preparation of notes re Ganz depo prep	\$1,188.00	0.70		\$831.60										
02/04/2020	Guy Wallace (GBW)	com's with BU re same	\$1,188.00	0.20		\$237.60										
02/05/2020	Guy Wallace (GBW)	com's with Ganz; BU re deposition	\$1,188.00	0.40		\$475.20										
02/06/2020	Guy Wallace (GBW)	conf with Ganz; BU re depo preparation	\$1,188.00	0.80		\$950.40										
02/06/2020	Guy Wallace (GBW)	deposition of Ganz	\$1,188.00	7.00		\$8,316.00										
02/06/2020	Guy Wallace (GBW)	com's with Ganz; CJH; BU; MTJ re results of deposition and analysis of testimony	\$1,188.00	0.80		\$950.40										
02/07/2020	Guy Wallace (GBW)	com's with CJH; KAS; BU re deposition of Fearn	\$1,188.00	0.40		\$475.20										
02/07/2020	Guy Wallace (GBW)	com's with CJH; KAS; BU re deposition of Ganz (DUPLICATE TO ABOVE ENTRY???)	\$1,188.00	0.40		\$475.20	0.4	\$475.20								
02/12/2020	James Dion (JMD)	Download, upload/email JND and save to E drive document production 20.02.12	\$850.00	1.40		\$1,190.00	1.4	\$1,190.00								
02/12/2020	Travis Close (TCC)	Email to BU (co-counsel) re: analyzing residency agreements	\$888.00	0.20		\$177.60										
02/13/2020	James Dion (JMD)	Email mail and team re: document production uploaded on E drive.	\$850.00	0.10		\$85.00	0.1	\$85.00								
02/14/2020	Guy Wallace (GBW)	com's with CJH BU re inquiries from Gorman re Ganz testimony	\$1,188.00	0.20		\$237.60										
02/19/2020	James Dion (JMD)	Email JND re: request for deposition transcript syncing as possibility as requested by Stefanie Warren.	\$850.00	0.10		\$85.00	0.1	\$85.00								
02/19/2020	James Dion (JMD)	Read and forward email re: transcript features in relativity.	\$850.00	0.10		\$85.00	0.1	\$85.00								
02/20/2020	Guy Wallace (GBW)	prepare for meeting with Amy Fearn re depo preparation	\$1,188.00	0.60		\$712.80										
02/20/2020	Travis Close (TCC)	Review Ps responses to Ds ROGs and RFPs (Fearn, Amy) for GBW	\$888.00	0.40		\$355.20										
02/20/2020	Guy Wallace (GBW)	conf with Fearn; BU re preparation for deposition of Fearn	\$1,188.00	4.70		\$5,583.60										
02/20/2020	Guy Wallace (GBW)	com's with Healey; BU re depositions of Ganz; Fearn	\$1,188.00	0.50		\$594.00										
02/21/2020	Guy Wallace (GBW)	review and analysis of com's with BU re corrections to Ganz testimony	\$1,188.00	0.10		\$118.80										
02/21/2020	Guy Wallace (GBW)	com's with BU and CJH re same	\$1,188.00	0.20		\$237.60										
02/22/2020	Guy Wallace (GBW)	review and analysis of deposition preparation notes from BU re deposition of Fearn	\$1,188.00	0.50		\$594.00										
02/23/2020	Mark Johnson (MTJ)	review emails from CH re strategy on motion for class certification.	\$888.00	0.10		\$88.80										
02/25/2020	Guy Wallace (GBW)	review and analysis of draft of class cert brief from CJH	\$1,188.00	0.50		\$594.00										

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
02/26/2020	Guy Wallace (GBW)	prepare for and participate in tc with Fearn; BU re preparation for deposition	\$1,188.00	0.70							
02/26/2020	Mark Johnson (MTJ)	coms w/ J Dion, Healey and Denton's paralegal re setting up access to linked video transcripts and exhibits in Relativity.	\$888.00	0.20							
02/27/2020	James Dion (JMD)	Read email thread re: deposition transcripts being uploaded to relativity and logistics with JND	\$850.00	0.10			\$85.00				
02/27/2020	Travis Close (TCC)	Review d's motion and exhibits re: ex parte protective order	\$888.00	0.30							
02/28/2020	Lourdes Castro (LEC)	downloading transcripts received in mail and esaving them in the E drive and uploading them to the JND FTP site	\$450.00	2.10			\$945.00				
02/28/2020	Lourdes Castro (LEC)	communication with GBW re Ordering food for deposition	\$450.00	0.30			\$135.00				
02/28/2020	Travis Close (TCC)	Review Ps opposition to Ds exp parte motion for relief	\$888.00	0.20							
02/28/2020	Guy Wallace (GBW)	prepare for and defend deposition of Amy Fearn	\$1,188.00	9.70			\$11,523.60				
02/28/2020	Guy Wallace (GBW)	com's with Fearn; CJH; BU re results of Fearn depo	\$1,188.00	0.50			\$594.00				
03/02/2020	Guy Wallace (GBW)	review and analysis of draft declaration of KAS re discovery order from Magistrate Judge; com's with co-counsel re response to D's conduct in discovery and litigation	\$1,188.00	0.40							
03/03/2020	James Dion (JMD)	Download unzip to E drive, upload/email jnd re: production SUN013.	\$850.00	0.20			\$170.00				
03/03/2020	Guy Wallace (GBW)	com's with CJH; MY; BU; RC re class cert discovery; MTC's; class member declarations	\$1,188.00	0.40			\$475.20				
03/03/2020	Guy Wallace (GBW)	draft class cert brief	\$1,188.00	0.30			\$356.40				
03/04/2020	Guy Wallace (GBW)	review and analysis of letter from Maryott of 2/20/20	\$1,188.00	2.50			\$2,970.00				
03/04/2020	Guy Wallace (GBW)	review and analysis of draft motion for class certification	\$1,188.00	1.20			\$1,425.60				
03/04/2020	Guy Wallace (GBW)	legal research and analysis re Stearns case and subsequent decisions re abrogation	\$1,188.00	1.20			\$1,425.60				
03/04/2020	Guy Wallace (GBW)	legal research and analysis re standards of proof at the class certification stage and language re capable of classwide proof; Ninth Circuit Stockwell decision and Comcast decision	\$1,188.00	1.30			\$1,544.40				
03/05/2020	James Dion (JMD)	Read email from co-counsel troubleshoot issues with DTER production. Downloaded unzip to E drive. upload/email jnd re: production issue fixing and reupload. Troubleshoot SUN010-SUN012 issues and email co-counsel re: receiving these productions.	850	0.80			\$680.00				
03/05/2020	Guy Wallace (GBW)	com's with BU re depo testimony of Fearn; Ganz	\$1,188.00	0.30			\$356.40				
03/05/2020	Guy Wallace (GBW)	revise and edit draft letter to Maryott	\$1,188.00	0.30			\$356.40				
03/05/2020	Guy Wallace (GBW)	com's with KAS; CJH re same	\$1,188.00	0.20			\$237.60				
03/06/2020	Guy Wallace (GBW)	legal research and analysis re the nature of P's burden at class certification to show that common questions are capable or susceptible of common proof	\$1,188.00	1.20			\$1,425.60				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs		Hrs		Hrs		Hrs	
03/07/2020	Guy Wallace (GBW)	legal research and analysis re standard of proof required re class damages model at the class certification stage; Chavez case and its progeny	\$1,188.00	1.30		\$1,544.40								
03/07/2020	Guy Wallace (GBW)	legal research and analysis re Stearns and its progeny, issue of abrogation on other grounds re core holdings, standard of proof re class certification and commonality and predominance and nature of evidentiary showing that is required	\$1,188.00	1.80		\$2,138.40								
03/08/2020	Guy Wallace (GBW)	legal research and analysis re recent Ninth Circuit cases and burden to show a method of proving damages on a classwide basis	\$1,188.00	0.80		\$950.40								
03/09/2020	James Dion (JMD)	Email co counsel re: issues with SUN010, SUN011, SUN012 production not coming thru email, request dropbox	\$850.00	0.10		\$85.00	0.1	\$85.00						
03/09/2020	James Dion (JMD)	Download SUN014, SUN015, SUN016 and troubleshoot SUN010, SUN011, SUN012 productions not coming thru email	\$850.00	0.40		\$340.00	0.4	\$340.00						
03/11/2020	James Dion (JMD)	Email mail MTJ, TCC re: Sunrise doc productions SUN011, 12, 14, 15, 16, 17 uploaded to E drive.	\$850.00	0.10		\$85.00	0.1	\$85.00						
03/11/2020	Guy Wallace (GBW)	review and analysis of letter from Maryott re Fearn depo	\$1,188.00	0.50		\$594.00								
03/12/2020	Lourdes Castro (LEC)	communication with GBW re deposition time re calling TSG	\$450.00	0.10		\$45.00	0.1	\$45.00						
03/12/2020	Lourdes Castro (LEC)	communication with TSG re deposition time	\$450.00	0.10		\$45.00	0.1	\$45.00						
03/12/2020	Guy Wallace (GBW)	review and analysis of Fearn depo transcript	\$1,188.00	0.40		\$475.20								
03/12/2020	Guy Wallace (GBW)	review and analysis of draft of class certification brief	\$1,188.00	0.90		\$1,069.20								
03/12/2020	Guy Wallace (GBW)	legal research and analysis re standard of proof for plaintiffs re damages; liability at class cert stage	\$1,188.00	0.90		\$1,069.20								
03/16/2020	Guy Wallace (GBW)	review and analysis of letter from Maryott re Fearn deposition; preparation of responsive points	\$1,188.00	0.40		\$475.20								
03/16/2020	Guy Wallace (GBW)	tc with BU re same	\$1,188.00	0.20		\$237.60								
03/18/2020	Ryan Bonner (RAB)	Uploading document production "SUN018.zip" to Relativity platform	\$900.00	0.80		\$720.00	0.8	\$720.00						
03/18/2020	Guy Wallace (GBW)	com to D's counsel re response to March 11 letter re Fearn depo	\$1,188.00	0.10		\$118.80								
03/18/2020	Guy Wallace (GBW)	com's with CJH; BU re further deposition of Fearn	\$1,188.00	0.30		\$356.40								
03/19/2020	Ryan Bonner (RAB)	Uploading SUN018 Production onto firm E:Drive	\$900.00	1.00		\$900.00	1	\$900.00						
03/19/2020	Guy Wallace (GBW)	com's with BU; KAS re further deposition of Fearn	\$1,188.00	0.20		\$237.60								
03/19/2020	Guy Wallace (GBW)	legal research and analysis re nature and quantity of proof necessary to show a common issue of law or fact and Ninth Circuit and district court precedent re same	\$1,188.00	1.20		\$1,425.60								
03/19/2020	Guy Wallace (GBW)	tc with CJH re draft class cert brief and class cert motion	\$1,188.00	0.50		\$594.00								
03/20/2020	Guy Wallace (GBW)	com's with BU re further deposition of Fearn	\$1,188.00	0.10		\$118.80								
03/20/2020	Guy Wallace (GBW)	legal research and analysis re P's evidentiary burden at class certification re commonality and liability; Supreme Court, Ninth Circuit cases re same	\$1,188.00	1.20		\$1,425.60								
03/21/2020	Guy Wallace (GBW)	review and analysis of draft of class certification brief	\$1,188.00	1.10		\$1,306.80								
03/21/2020	Guy Wallace (GBW)	revise and edit same	\$1,188.00	1.00		\$1,188.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
03/22/2020	Guy Wallace (GBW)	revise and edit draft class certification brief	\$1,188.00	2.20							
03/23/2020	Lourdes Castro (LEC)	servicing documents via email	\$450.00	0.50		0.5	\$225.00				
03/23/2020	Lourdes Castro (LEC)	communication with LZC re mailing letter out on behalf of GBW	\$450.00	0.10		0.1	\$45.00				
03/23/2020	Guy Wallace (GBW)	review and analysis of draft of class certification brief	\$1,188.00	1.20							
03/23/2020	Guy Wallace (GBW)	revise and edit same	\$1,188.00	1.20							
03/23/2020	Guy Wallace (GBW)	legal research and analysis re J. Staton and decisions re class certification involving CLRA and/or UCL claims	\$1,188.00	1.20							
03/23/2020	Guy Wallace (GBW)	com's with Umpierre re Fearn and further deposition	\$1,188.00	0.20							
03/23/2020	Guy Wallace (GBW)	revise and edit draft letter to Maryott re same	\$1,188.00	0.20							
03/23/2020	Guy Wallace (GBW)	legal research and analysis re P's burden to present common proof to support class certification re claims under the CLRA and UCL, cases involving false or misleading statements, omissions and/or common defects that have not yet manifested	\$1,188.00	2.30							
03/24/2020	Guy Wallace (GBW)	review and analysis of draft argument in class cert brief re target staffing hours vs. Standard Hours and sufficiency thereof as a form of common proof for purposes of commonality and predominance	\$1,188.00	1.40							
03/24/2020	Guy Wallace (GBW)	revise and edit draft class certification brief	\$1,188.00	1.30							
03/24/2020	Guy Wallace (GBW)	legal research and analysis re class certification standards; J. Staton's class certification decisions, recent cases re material misrepresentations establish classwide injury	\$1,188.00	1.70							
03/25/2020	Guy Wallace (GBW)	legal research and analysis re Stearns v. Ticketmaster and subsequent history re Comcast	\$1,188.00	0.80							
03/26/2020	Guy Wallace (GBW)	legal research and analysis re Stearns and issue re abrogation on other grounds by Comcast; Ninth Circuit decision in Ramirez v. TransUnion re issue of whether all class members must have suffered damages and potential for S.Ct. review of same	\$1,188.00	1.70							
03/27/2020	Guy Wallace (GBW)	review and analysis of and revise and edit draft of class cert brief	\$1,188.00	2.90							
03/27/2020	Guy Wallace (GBW)	revise and edit draft class certification brief, including preparation of redline of same	\$1,188.00	2.80							
03/27/2020	Guy Wallace (GBW)	tc with BU re questions re fact record for class certification	\$1,188.00	0.20							
03/28/2020	Guy Wallace (GBW)	revise and edit draft class cert brief; statement of facts	\$1,188.00	1.20							
03/28/2020	Guy Wallace (GBW)	revise and edit draft of class cert brief	\$1,188.00	4.10							
03/28/2020	Guy Wallace (GBW)	com's with CJH; BU; MTJ re same (.3)	\$1,188.00	0.30							
03/29/2020	Guy Wallace (GBW)	analysis of current draft of class cert brief and schedule on class certification and status of discovery	\$1,188.00	0.20							
03/29/2020	Guy Wallace (GBW)	tc with MTJ re same	\$1,188.00	0.20							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
03/29/2020	Guy Wallace (GBW)	legal research and analysis re J. Staton's decision in Yun Park; Ninth Circuit's decision in O'Connor v. Uber Techs; district court decision in Berman v. Freedom Fin. Network and issues re class certification, definition of the class, and putative class members who are covered by arbitration agreements	\$1,188.00	1.10		\$1,306.80									
03/29/2020	Mark Johnson (MTJ)	com w/ GBW re draft class cert motion, possible extention of time for filing same	\$888.00	0.10		\$88.80									
03/29/2020	Mark Johnson (MTJ)	review draft of class cert brief	\$888.00	1.30		\$1,154.40									
03/30/2020	Lourdes Castro (LEC)	communication with GBW re letter served to Michelle Maryott on 3/23/20	\$450.00	0.30		\$135.00	0.3	\$135.00							
03/30/2020	Ryan Bonner (RAB)	Uploading Production SUN019 production to ftp site for Relativity hosting	\$900.00	0.30		\$270.00	0.3	\$225.00							
03/30/2020	Ryan Bonner (RAB)	Uploading, extracting and naming production SUN019.zip on shared drive	\$900.00	0.40		\$360.00	0.4	\$360.00							
03/30/2020	Ryan Bonner (RAB)	Checking metadata of new production SUN0099512 - 95694 (105 Documents).	\$900.00	0.70		\$630.00	0.7	\$630.00							
03/30/2020	Mark Johnson (MTJ)	further review of class certification and prepare notes re same for discussion w/ B=GBW	\$888.00	0.50		\$444.00									
03/30/2020	Guy Wallace (GBW)	com's with Gorman; Maryott; CJH; BU; LEC re correspondence re continuation of Fearn depo	\$1,188.00	0.30		\$356.40									
03/30/2020	Guy Wallace (GBW)	com's with MTJ re draft class cert brief; schedule; issues re commonality; approach to arbitration agreements	\$1,188.00	0.60		\$712.80									
03/30/2020	Guy Wallace (GBW)	legal research and analysis re trial plans and email to CJH re same	\$1,188.00	0.60		\$712.80									
03/30/2020	Mark Johnson (MTJ)	call w/ GBW re comments on class cert draft brief and issue re same, including evidence of commonality, how to deal with arbitration issue	\$888.00	0.60		\$532.80									
03/30/2020	Guy Wallace (GBW)	analysis of draft class cert brief and issues re commonality across facilities	\$1,188.00	0.50		\$594.00									
03/30/2020	Guy Wallace (GBW)	com's with CJH re draft class cert brief and revisions thereto; schedule on class certification; target hours vs. actual hours in Sunrise facilities; arbitration agreements and approach re same	\$1,188.00	0.70		\$831.60									
03/30/2020	Mark Johnson (MTJ)	further conversation w/ GBW re class cert brief and arbitration, potential extension of time for filing brief.	\$888.00	0.30		\$266.40									
03/30/2020	Guy Wallace (GBW)	review and analysis of SC memo re D's arbitration agreements argument	\$1,188.00	0.50		\$594.00									
03/30/2020	Guy Wallace (GBW)	review and analysis of target hours and actual hours spreadsheet produced by Defendants	\$1,188.00	0.70		\$831.60									
03/30/2020	Mark Johnson (MTJ)	further calls (x3) with GBW re class cert brief, including arbitration, who decides arbitrability and arguments on unconscionability of arbitration agreement, advisabilty of seeking extension to file class cert motion	\$888.00	0.40		\$355.20									
03/30/2020	Mark Johnson (MTJ)	research re arbitrabilty and delgation of arbitrability decision to arbitrator for context for class cert motion	\$888.00	3.00		\$2,664.00									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
03/30/2020	Mark Johnson (MTJ)	draft memo re results of research on arbitration, arbitrability and delgationof decision to arbitrator	\$888.00	0.80							
03/31/2020	Mark Johnson (MTJ)	further call w/ GBW re strategy on class certification motion, evidence in support of staffing argument, expert declarations, treatment of arbitration issue	\$888.00	0.50							
03/31/2020	Guy Wallace (GBW)	com's with CJH; MTJ re schedule on motion; common issues and critique of target staffing; Rule 30(b)(6) deposition of Sunrise	\$1,188.00	0.50							
03/31/2020	Guy Wallace (GBW)	review and analysis of revised draft of class cert brief	\$1,188.00	0.40							
04/01/2020	Mark Johnson (MTJ)	call w/ GBW re argument and evidnece re commonality on staffing issue for class cert brief	\$888.00	0.40							
04/01/2020	Guy Wallace (GBW)	com's with CJH; MTJ re common issues; preparation of class cert argument re same; schedule on class certification	\$1,188.00	0.50							
04/02/2020	Ryan Bonner (RAB)	Setting up ftp with JND for file hosting	\$900.00	0.20			0.2		\$180.00		
04/02/2020	Guy Wallace (GBW)	review and analysis of letter from Maryott re Rule 30(b)(6) deposition, schedule on class certification, and analysis of response re same	\$1,188.00	0.50							
04/02/2020	Mark Johnson (MTJ)	call w/ GBW re ltr from OC re extension to file class cert motion, 30b6 deposition,	\$888.00	0.20							
04/02/2020	Mark Johnson (MTJ)	coms w/ COC Healy, Asher and w/ RAB re relativity access for COC	\$888.00	0.20							
04/03/2020	Ryan Bonner (RAB)	Uploading to production SUN10 (supplemental) to ftp for Relativity hosting and transferring to E: Drive	\$900.00	0.40			0.4		\$360.00		
04/03/2020	Ryan Bonner (RAB)	Setting up secure ftp site for file Hosting new production "Operations Manual"	\$900.00	0.20			0.2		\$180.00		
04/03/2020	Ryan Bonner (RAB)	Transferring WY104_168309 thru WY104_0175670 to ftp for upload to Relativity. Upload of remaining 4.3GBs of production	\$900.00	0.60			0.6		\$540.00		
04/03/2020	Mark Johnson (MTJ)	call w/ GBW re strategy on timing of class cert motion and 30b6 deposition	\$888.00	0.30							
04/03/2020	Guy Wallace (GBW)	com's with MTJ re D's refusal to produce Rule 30(b)(6) witness for deposition and implications for class certification motion	\$1,188.00	0.90					\$1,069.20		
04/03/2020	Guy Wallace (GBW)	tc with CJH; Marks; MTJ re D's refusal to produce Rule 30(b)(6) witness for deposition and implications for class certification motion and schedule; D's staffing policy; D's production of some staffing data	\$1,188.00	0.50					\$594.00		
04/03/2020	Guy Wallace (GBW)	com's with CJH re D's letter of 3/27/20 letter and Sunrise Operations Manual	\$1,188.00	0.20					\$237.60		
04/03/2020	Guy Wallace (GBW)	review and analysis of D's letter of 3/27/20 re class discovery and documents produced by Defendants re policies and procedures	\$1,188.00	0.20					\$237.60		
04/03/2020	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20					\$237.60		

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
04/03/2020	Mark Johnson (MTJ)	call w/ C. Healey, GBW, David Marks, Bob Coccia re analysis of class certification issues and strategy, response to OC letter and need for 30(b)96) deposition	\$888.00	1.00		\$888.00									
04/03/2020	Mark Johnson (MTJ)	calls w/ GBW (x5) re strategy for class certification timing/extension, response to cancellation of 30(b)96) depo, evidence in support of common proof, follow up on call with co-counsel	\$888.00	1.20		\$1,065.60									
04/03/2020	Mark Johnson (MTJ)	research local rules and standing order/judges procedures on length of class cert brief	\$888.00	0.10		\$88.80									
04/03/2020	Mark Johnson (MTJ)	email and call w/ GBW re same	\$888.00	0.10		\$88.80									
04/03/2020	Mark Johnson (MTJ)	review OC discovery letter and portions of 1200 page operations manual for support of commonality element of class certification motion per discussion w/ CH	\$888.00	1.40		\$1,243.20									
04/04/2020	Guy Wallace (GBW)	tc with MTJ re Sunrise's Operations Manual and P's theory and burden of proof at class certification	\$1,188.00	0.50		\$594.00									
04/04/2020	Mark Johnson (MTJ)	further discussions w/ GBW re class certification timing and strategy, results of review of operations manual bearing on same	\$888.00	0.50		\$444.00									
04/04/2020	Mark Johnson (MTJ)	further review of sections 3 and 1 of operations manual for statements supporting class cert motion	\$888.00	1.20		\$1,065.60									
04/04/2020	Guy Wallace (GBW)	review and analysis of Staffing and Scheduling Refresher; Operations Manual re information re policies and/or staffing procedures	\$1,188.00	1.20		\$1,425.60									
04/05/2020	Guy Wallace (GBW)	review and analysis of draft of class cert brief	\$1,188.00	1.00		\$1,188.00									
04/05/2020	Guy Wallace (GBW)	preparation of further comments re supporting evidence and argument and circulation of further redline version re same	\$1,188.00	0.70		\$831.60									
04/05/2020	Guy Wallace (GBW)	review and analysis of CJH email re class cert schedule and letter from Maryott and P's position in response thereto	\$1,188.00	0.40		\$475.20									
04/05/2020	Guy Wallace (GBW)	com's with MTJ re draft of class cert brief, analysis of D's Operations Manual and follow up questions re same for purposes of commonality and common defect issues	\$1,188.00	0.70		\$831.60									
04/05/2020	Guy Wallace (GBW)	com's with CJH re P's draft of class cert brief; showing necessary for commonality; expert declaration of Dr. Flores re same; schedule on class certification and response to letter from Maryott re same	\$1,188.00	0.90		\$1,069.20									
04/05/2020	Mark Johnson (MTJ)	calls w/ GBW (x2) re class certification strategy, issues from operations manual re same, need for 30(b)(6) depo	\$888.00	0.80		\$710.40									
04/05/2020	Mark Johnson (MTJ)	further review of section 2 of operations manual to identify class cert related issues, basis for service level, points, care manager hours corresponding to service levels; search relativity production of documents for task, time, etc.	\$888.00	1.40		\$1,243.20									
04/06/2020	Ryan Bonner (RAB)	Issuing new Relativity user credentials for Co-Counsel's Document Review team	\$900.00	0.20		\$180.00		0.2	\$180.00						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
04/06/2020	Ryan Bonner (RAB)	Uploading Native files for SUN10 Supplemental production. SUN0024222 to 24471	\$900.00	0.20			\$180.00				
04/06/2020	Lourdes Castro (LEC)	communication with GBW re correspondance	\$450.00	0.10			\$45.00				
04/06/2020	Ryan Bonner (RAB)	Uploading Plaintiff's production March 5, March 16, and March 19, 2020 for Relativity Hosting	\$900.00	0.50			\$450.00				
04/06/2020	Lourdes Castro (LEC)	printing and mailing out letter to OC	\$450.00	0.30			\$135.00				
04/06/2020	Guy Wallace (GBW)	preparation and drafting of letter to Maryott re class cert schedule	\$1,188.00	1.00			\$1,188.00				
04/06/2020	Guy Wallace (GBW)	revise and edit same	\$1,188.00	0.50			\$594.00				
04/06/2020	Guy Wallace (GBW)	review and analysis of Sunrise bonus plan document for ED's	\$1,188.00	0.20			\$237.60				
04/06/2020	Guy Wallace (GBW)	com's with CJH; MTJ; BU re proposed modification to schedule on class certification	\$1,188.00	0.30			\$356.40				
04/06/2020	Guy Wallace (GBW)	com's with BU; MTJ re preparation of declarations of putative class members to support class cert motion	\$1,188.00	0.30			\$356.40				
04/06/2020	Mark Johnson (MTJ)	call w/ GBW re class cert issues, extension of deadlne for filing same, 30b6 depo, letter to OC re depo and extension	\$888.00	0.20			\$177.60				
04/06/2020	Mark Johnson (MTJ)	review and editGBW draft ltr to OC re 30b6 depo and timing for filing class cert motion	\$888.00	0.20			\$177.60				
04/07/2020	Guy Wallace (GBW)	com's with CJH; MTJ re schedule on class certification and further meet and confer with D's re same; information from Marks re D's production of data re staffing; revisions to draft class cert brief	\$1,188.00	0.40			\$475.20				
04/08/2020	Mark Johnson (MTJ)	review email and data from D Marks re staffing and email response from C. Healey re same and arguments to make on class cert	\$888.00	0.20			\$177.60				
04/08/2020	Mark Johnson (MTJ)	confer w/ GBW re same	\$888.00	0.30			\$266.40				
04/08/2020	Guy Wallace (GBW)	com's with MTJ re motion to district court re modification of class cert schedule; analysis of staffing shortfalls in Sunrise facilities and defect in staffing procedures	\$1,188.00	0.40			\$475.20				
04/08/2020	Guy Wallace (GBW)	com's with CJH re modification to class cert schedule and seeking relief from Court re same	\$1,188.00	0.20			\$237.60				
04/08/2020	Guy Wallace (GBW)	com's with Maryott re D's response to P's proposal re Rule 30(b)(6) depo and class cert schedule	\$1,188.00	0.10			\$118.80				
04/09/2020	Guy Wallace (GBW)	com's with CJH; Marks; MTJ re D's proposed schedule re class certification and Rule 30(b)(6) depo and P's response thereto	\$1,188.00	0.60			\$712.80				
04/09/2020	Guy Wallace (GBW)	revise and edit draft stipulation and proposed order re schedule re class cert and Rule 30(b)(6) depo	\$1,188.00	0.20			\$237.60				
04/09/2020	Guy Wallace (GBW)	com's with BU re errata to Fearn depo; D's request for privilege log	\$1,188.00	0.10			\$118.80				
04/09/2020	Mark Johnson (MTJ)	draft stipulation and proposed order re 30b6 deposition and class cert schedule and briefing; review docket, depo notices and prior correspondence and notes for same	\$888.00	2.70			\$2,397.60				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General		CC Confs		Falkenberg		Travel	
							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
04/09/2020	Mark Johnson (MTJ)	com w/ GBW re class certification and depo schedule, stipulation re same	\$888.00	0.20		\$177.60								
04/10/2020	Mark Johnson (MTJ)	call w/ GBW re proposed communication w/ OC re stip and class certification timing, 30b6 depo topics and key issue/documents for staffing analysis and argument.	\$888.00	0.20		\$177.60								
04/10/2020	Guy Wallace (GBW)	com's with Maryott and D's counsel; CJH; MTJ re schedule on class cert and stipulation and proposed order re same	\$1,188.00	0.40		\$475.20								
04/13/2020	Guy Wallace (GBW)	com's with Allyn re schedule on class certification and analysis of same	\$1,188.00	0.40		\$475.20								
04/13/2020	Guy Wallace (GBW)	com's with CJH; MTJ re D's proposed revisions to stipulation and order re class cert schedule	\$1,188.00	0.70		\$831.60								
04/13/2020	Mark Johnson (MTJ)	calls w/ GBW (x4) re email to OC re stip; strategy for responding to denial of additional time to file class cert motion, seeking relief from court	\$888.00	0.80		\$710.40								
04/13/2020	Mark Johnson (MTJ)	drat email response for GBW to OC emal rejecting proposed 5/29 filing date for class cert motion	\$888.00	0.40		\$355.20								
04/14/2020	Lourdes Castro (LEC)	Preparing document for filing	\$450.00	2.40		\$1,080.00	2.4	\$1,080.00						
04/14/2020	Lourdes Castro (LEC)	Finaling and filing stip and PO	\$450.00	0.50		\$225.00	0.5	\$225.00						
04/14/2020	Lourdes Castro (LEC)	Communication with MTJ, SLG and TBS re filing stip and PO	\$450.00	0.40		\$180.00	0.4	\$180.00						
04/14/2020	Lourdes Castro (LEC)	adding attestation to stip for signature; working on draft PO for filing	\$450.00	1.50		\$675.00	1.5	\$675.00						
04/14/2020	Guy Wallace (GBW)	com's with Allyn re stipulation on class cert schedule and analysis of same	\$1,188.00	0.30		\$356.40								
04/14/2020	Guy Wallace (GBW)	com's with CJH; MTJ re schedule on class cert and stipulation re same	\$1,188.00	0.50		\$594.00								
04/14/2020	Guy Wallace (GBW)	com's with CJH re class certification and issue of common defect in D's policies and procedures re staffing	\$1,188.00	0.40		\$475.20								
04/14/2020	Guy Wallace (GBW)	tc with Marks; CJH; RC; MT re Sunrise's policies and procedures re staffing and defects re same	\$1,188.00	0.90		\$1,069.20								
04/14/2020	Mark Johnson (MTJ)	begin working on ex parte application for extension of time for filing class cert brief and modification of briefing schedule	\$888.00	1.50		\$1,332.00								
04/14/2020	Mark Johnson (MTJ)	multiple calls w/ GBW re strategy for communications w/ OC re negotiation of class cert deadline and briefing schedule	\$888.00	0.30		\$266.40								
04/14/2020	Mark Johnson (MTJ)	review emails from OC re same	\$888.00	0.10		\$88.80								
04/14/2020	Mark Johnson (MTJ)	emal to court re procedure for seeking extension of class cert deadline	\$888.00	0.10		\$88.80								
04/14/2020	Mark Johnson (MTJ)	com w/ GBW re same	\$888.00	0.10		\$88.80								
04/15/2020	Lourdes Castro (LEC)	Checking local rules for chambers copies, preparing docs for chambers copies	\$450.00	0.70		\$315.00	0.7	\$315.00						
04/15/2020	Lourdes Castro (LEC)	communication with MTJ re sending Chambers copies for the stipulation filing	\$450.00	0.10		\$45.00	0.1	\$45.00						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
04/15/2020	Mark Johnson (MTJ)	coms w/ Tyler Smith and Lourdes Castro re chambers copies of stip re continuance of class cert motion DL	\$888.00	0.10		\$88.80									
04/15/2020	Mark Johnson (MTJ)	review rules and Judge Stanton requirements re same com's with BU; MTJ; CJH re D's request for privilege log re	\$888.00	0.10		\$88.80									
04/16/2020	Guy Wallace (GBW)	Fearn	\$1,188.00	0.20		\$237.60									
04/16/2020	Guy Wallace (GBW)	review and analysis of Order from J. Staton re schedule on class cert	\$1,188.00	0.10		\$118.80									
04/16/2020	Mark Johnson (MTJ)	review david marks memos/analysis re staffing analysis, issues with data and documents produced	\$888.00	0.30		\$266.40									
04/17/2020	Mark Johnson (MTJ)	call w/ GBW, Healey, Coccia, Thamer, Marks re class certification strategy, staffing methodology, staffing related data, Exhibits re same	\$888.00	1.70		\$1,509.60				1.7					
04/17/2020	Mark Johnson (MTJ)	follow up call w/ GBW following team call re commonality issues for class certification, staffing methodology	\$888.00	0.30		\$266.40									
04/17/2020	Mark Johnson (MTJ)	review memos and documents and agenda from C. Healey and D. Marks re staffing analysis, tasks for class cert motion for conference call.	\$888.00	0.70		\$621.60									
04/17/2020	Guy Wallace (GBW)	tc with Marks; CJH; RC; MT; MTJ re Sunrise's staffing policies, procedures and data; defects re same	\$1,188.00	1.60		\$1,900.80			1.6						
04/17/2020	Guy Wallace (GBW)	tc with MTJ re opening papers on class certification and supporting declarations from putative class members	\$1,188.00	0.30		\$356.40									
04/17/2020	Guy Wallace (GBW)	preparation of key points for potential declaration of Dr. Flores in support of P's motion for class certification	\$1,188.00	0.60		\$712.80									
04/20/2020	Rachel Steyer (RLS)	reviewing second amended complaint	\$775.00	0.50		\$387.50			0.5						
04/20/2020	Ryan Bonner (RAB)	Batch document project, running keyword searches on Relativity	\$900.00	0.60		\$540.00			0.6						
04/20/2020	Guy Wallace (GBW)	com's with CJH re Dr. Flores declaration; class certification motion	\$1,188.00	0.40		\$475.20									
04/20/2020	Guy Wallace (GBW)	tc with MTJ re preparation of class cert motion	\$1,188.00	0.20		\$237.60									
04/20/2020	Guy Wallace (GBW)	review and analysis of spreadsheet showing iterations of Sunrise Residency Agreement and common false or misleading statements therein	\$1,188.00	0.30		\$356.40									
04/21/2020	Rachel Steyer (RLS)	reviewing pleadings to familiarize myself with the case	\$775.00	2.50		\$1,937.50			2.5						
04/21/2020	Guy Wallace (GBW)	preparation and drafting of draft declaration of Dr. Flores	\$1,188.00	3.50		\$4,158.00									
04/21/2020	Guy Wallace (GBW)	com's with BU re meet and confer with D.'s re Ganz depo and errata re same; Fearn depo	\$1,188.00	0.40		\$475.20									
04/22/2020	Ryan Bonner (RAB)	Reviewing 4/14 Memorandum for Key Word Searches run on Relativity	\$900.00	1.10		\$990.00			1.1						
04/22/2020	Ryan Bonner (RAB)	Running Key word searches for potential batch set creation	\$900.00	1.40		\$1,260.00			1.4						
04/22/2020	Lourdes Castro (LEC)	Downloading and processing deposition exhibits	\$450.00	0.30		\$135.00			0.3						
04/22/2020	Ryan Bonner (RAB)	Document Unitization project for SU332363-03 splitting documents into 20 separate files and hosted on Relativity	\$900.00	0.60		\$540.00			0.6						
04/22/2020	Mark Johnson (MTJ)	call w/ GBW to discuss class cert issue, Flores declaration, comonality re staffing methodology	\$888.00	0.40		\$355.20									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General		CC Confs		Falkenberg		Travel	
							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
04/22/2020	Guy Wallace (GBW)	preparation of outline of Declaration of Dr. Flores re class certification	\$1,188.00	2.40		\$2,851.20								
04/22/2020	Guy Wallace (GBW)	review and analysis of Sunrise policies and procedures re staffing, service levels and others relating to issue of time required to perform caregiver tasks	\$1,188.00	1.00		\$1,188.00								
04/22/2020	Guy Wallace (GBW)	com's with CJH re draft of Flores declaration and defects in Sunrise policies and procedures during period between June 2013 and October 2019	\$1,188.00	0.60		\$712.80								
04/22/2020	Guy Wallace (GBW)	com's with MTJ re preparation of declaration of Dr. Flores	\$1,188.00	0.30		\$356.40								
04/22/2020	Mark Johnson (MTJ)	review and edit draft outline of points for Flores Declaration	\$888.00	0.50		\$444.00								
04/22/2020	Mark Johnson (MTJ)	com w/ GBW re same	\$888.00	0.20		\$177.60								
04/22/2020	Mark Johnson (MTJ)	search for and review documents in document production related to time task studies	\$888.00	0.80		\$710.40								
04/23/2020	Lourdes Castro (LEC)	calendar call to discuss motion for class cert for the team	\$450.00	0.10		\$45.00	0.1	\$45.00						
04/23/2020	Mark Johnson (MTJ)	com w/ RAB re Relativity search methodology and review instructions re same for conducting boolean searches	\$888.00	0.20		\$177.60								
04/23/2020	Mark Johnson (MTJ)	conduct additional searches of production and review documents for task time references	\$888.00	0.90		\$799.20								
04/23/2020	Mark Johnson (MTJ)	review prior emails from C Healey and agenda for call re planning for class cert motion.	\$888.00	0.10		\$88.80								
04/23/2020	Mark Johnson (MTJ)	call w/ co-counsel Healey, GBW, Megan, Stephanie, B Cocchia, Umpierre re tasks and responsibilities for class cert motion and supporting papers	\$888.00	0.90		\$799.20			0.9	799.2				
04/23/2020	Guy Wallace (GBW)	tc with CJH; RC; BU; MAY; MTJ re class certification and preparation for motion and evidence to be submitted in support thereof	\$1,188.00	0.80		\$950.40								
04/23/2020	Guy Wallace (GBW)	preparation of draft declaration of Dr. Flores re class certification	\$1,188.00	2.80		\$3,326.40								
04/24/2020	Travis Close (TCC)	Locate the assessment scoring tool for GBW	\$888.00	0.30		\$266.40								
04/24/2020	Travis Close (TCC)	Analyze/describe system of software assessments based on Villanueva deposition for GBW	\$888.00	1.00		\$888.00								
04/24/2020	Travis Close (TCC)	review MTJ's notes/main points from meet and confer meeting	\$888.00	0.10		\$88.80								
04/24/2020	Travis Close (TCC)	review Notes from BBK from today's meet and confer meeting	\$888.00	0.10		\$88.80								
04/24/2020	Mark Johnson (MTJ)	review and analyze template from coc for inputting assessment data	\$888.00	0.10		\$88.80								
04/24/2020	Mark Johnson (MTJ)	draft email to GBW re same and re advisability of using outside vendor for project, issues of reliability, etc.	\$888.00	0.20		\$177.60								
04/24/2020	Mark Johnson (MTJ)	review and analysis of pdf from DM containing assessment data for input into spreadsheet.	\$888.00	0.50		\$444.00								
04/24/2020	Mark Johnson (MTJ)	draft email to COC Healey and GBW re project for inputting assessment data into spreadsheet.	\$888.00	0.30		\$266.40								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions						
				Worked			General	CC Confs	Falkenberg	Travel			
<u>Fees</u>						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
04/24/2020	Guy Wallace (GBW)	com's with BU re meet and confer with Gorman re discovery issues	\$1,188.00	0.30									
04/24/2020	Guy Wallace (GBW)	tc with Kennedy; Petite; CJH re damages model and class cert declaration re same	\$1,188.00	0.60									
04/24/2020	Guy Wallace (GBW)	com's with CJH; BU; MTJ; TCC re Sunrise policies, procedures and operations documents re staffing and assessments	\$1,188.00	0.60									
04/24/2020	Guy Wallace (GBW)	com's with MTJ re D's assessment tool; scoring matrix	\$1,188.00	0.40									
04/24/2020	Guy Wallace (GBW)	com's with CJH; MTJ re inputting of assessment information produced by Sunrise	\$1,188.00	0.20									
04/24/2020	Guy Wallace (GBW)	review and analysis of Sunrise's policies, procedures, manuals re staffing and assessments and point scoring	\$1,188.00	2.40									
04/24/2020	Guy Wallace (GBW)	preparation and drafting of initial version of Declaration of Dr. Flores	\$1,188.00	2.80									
04/25/2020	Guy Wallace (GBW)	preparation and drafting of initial draft of Flores Declaration	\$1,188.00	3.20									
04/26/2020	Mark Johnson (MTJ)	draft emails to LEC re assignment of inputting personal assessment data	\$888.00	0.10									
04/26/2020	Guy Wallace (GBW)	preparation and drafting of initial draft of Dr. Flores declaration re class certification	\$1,188.00	5.40									
04/27/2020	Lourdes Castro (LEC)	training re Sunrise data project	\$450.00	0.70				0.7	\$315.00				
04/27/2020	Lourdes Castro (LEC)	downloading/ saving docs provided by Co-Counsel re data project	\$450.00	0.70				0.7	\$315.00				
04/27/2020	Lourdes Castro (LEC)	communication with Co-Counsel re problems accessing docs re data project	\$450.00	0.10				0.1	\$45.00				
04/27/2020	Guy Wallace (GBW)	preparation and drafting of initial draft of Declaration of Dr. Flores re class certification	\$1,188.00	4.10									
04/27/2020	Mark Johnson (MTJ)	participate in video conference re training for spreadsheet input of Personal Assesment data	\$888.00	0.70									
04/27/2020	Mark Johnson (MTJ)	review complaintis and DSS citation summaries from COC	\$888.00	0.30									
04/27/2020	Mark Johnson (MTJ)	coms w/ GBW re same for Flores Decl.	\$888.00	0.20									
04/28/2020	Rachel Steyer (RLS)	reviewing notes and docs for potential declarants, preparing draft declaration templates, corresponding with co-counsel	\$775.00	2.80				2.8	\$2,170.00				
04/28/2020	Guy Wallace (GBW)	preparation of initial draft of declaration of Dr. Flores re class certification	\$1,188.00	3.30									
04/28/2020	Guy Wallace (GBW)	com's with CJH; MTJ re initial draft of declaration of Dr. Flores, and analysis of potential edits re same	\$1,188.00	0.50									
04/28/2020	Guy Wallace (GBW)	preparation of topics and questions for Rule 30(b)(6) deposition re staffing	\$1,188.00	2.20									
04/28/2020	Guy Wallace (GBW)	review and analysis of Sunrise documents re same	\$1,188.00	2.00									
04/28/2020	Mark Johnson (MTJ)	review and edit draft of Flores declaration	\$888.00	1.80									
04/28/2020	Mark Johnson (MTJ)	calls (x2) w/ GBW re class cert mtn staffing shortage argment and issues w/ draft flores declaration.	\$888.00	0.50									
04/28/2020	Mark Johnson (MTJ)	further call w/ GBW re Flores declaration and issues for 30b6 depo	\$888.00	0.20									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
04/29/2020	Ryan Bonner (RAB)	Rehosting Sun017 production txt files to correct Relativity transfer error	\$900.00	0.30			\$270.00	0.3	\$270.00		
04/29/2020	Rachel Steyer (RLS)	filling in and drafting declarations, upating spreadsheet, calling class members, corresponding re status	\$775.00	7.10			\$5,502.50	7.1	\$5,502.50		
04/29/2020	Mark Johnson (MTJ)	review proposed 30(b)(6) questions prepared by GBW	\$888.00	1.20			\$1,065.60				
04/29/2020	Guy Wallace (GBW)	preparation of topics and questions for Rule 30(b)(6) depo	\$1,188.00	4.10			\$4,870.80				
04/29/2020	Guy Wallace (GBW)	com's with CJH; MTJ re same (.3)	\$1,188.00	0.30			\$356.40				
04/30/2020	Rachel Steyer (RLS)	drafting and editing declaration for class member, conversation to update and obtain relevant information to fill in declaration, final read through, updating excel spreadsheet	\$775.00	3.70			\$2,867.50	3.7	\$2,867.50		
04/30/2020	Rachel Steyer (RLS)	drafting and editing declaration for nancy hsieh following conversations with her; conducted final read out call and made minor tweaks, updated excel spreadsheet	\$775.00	3.70			\$2,867.50	3.7	\$2,867.50		
04/30/2020	Mark Johnson (MTJ)	review and revise draft declaration iso class certification from daughter of class member	\$888.00	0.50			\$444.00				
05/01/2020	Lourdes Castro (LEC)	Putting Data in Excel sheet	\$450.00	0.50			\$225.00	0.5	\$225.00		
05/01/2020	Rachel Steyer (RLS)	drafting and editing class member declarations; reviewing GBW edits; reaching out to class members, discussing case and questions re declaration info; scheduling follow up calls; correspondence with class members	\$775.00	7.60			\$5,890.00	7.6	\$5,890.00		
05/01/2020	Travis Close (TCC)	call TSG reporting to inquire when final transcript will be published	\$888.00	0.20			\$177.60				
05/01/2020	Guy Wallace (GBW)	com's with BU; MTJ re meet and confer issues; review and analysis of letter from Maryott re same	\$1,188.00	0.40			\$475.20				
05/01/2020	Mark Johnson (MTJ)	begin review and analysis of rough transcript of 30b6 depo	\$888.00	1.00			\$888.00				
05/01/2020	Mark Johnson (MTJ)	call w/GBW re 30b6 depo testimony	\$888.00	0.10			\$88.80				
05/01/2020	Mark Johnson (MTJ)	continue review and analysis of 30b6 testimony	\$888.00	3.70			\$3,285.60				
05/04/2020	Lourdes Castro (LEC)	adding data re Sunrisse Assesment spreadsheet	\$450.00	2.50			\$1,125.00	2.5	\$1,125.00		
05/04/2020	Rachel Steyer (RLS)	editing and finalizing draft declaration for class member Lisa Shiffrin, conducting final read through call, reviewing documents	\$775.00	2.90			\$2,247.50	2.9	\$2,247.50		
05/04/2020	Rachel Steyer (RLS)	preparing draft declarations, attempting outreach to class members to review and ask questions to fill out declarations, drafting accordingly, scheduling follow up calls	\$775.00	4.50			\$3,487.50	4.5	\$3,487.50		
05/04/2020	Guy Wallace (GBW)	tc with CJH; MTJ re preparation of motion for class certification; Rule 30(b)(6) depo of Slichta	\$1,188.00	0.60			\$712.80				
05/04/2020	Guy Wallace (GBW)	com's with MTJ re Slichta deposition, commonality issues re staffing policies and procedures	\$1,188.00	0.40			\$475.20				
05/04/2020	Guy Wallace (GBW)	legal research and analysis re commonality and predominance, and argument re failure to adopt and implement sufficient corporate policies and procedures can satisfy same	\$1,188.00	3.20			\$3,801.60				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
05/04/2020	Guy Wallace (GBW)	preparation of email to CJH and MTJ re same	\$1,188.00	0.20							
05/04/2020	Guy Wallace (GBW)	review and analysis of Rule 30(b)(6) depo of Slichtha	\$1,188.00	1.40							
05/04/2020	Mark Johnson (MTJ)	call with Chris Healey and GBW re class certification brief and Flores Declaration, relevant testimony from 30(b)(6) witness.	\$888.00	0.70							
05/04/2020	Mark Johnson (MTJ)	follow up call w/ GBW re Flores declaration for class cert brief, 30(b)(6) depo	\$888.00	0.20							
05/05/2020	Ryan Bonner (RAB)	Downloading and Uploading Assert production ASSERT016 for hosting on Relativity and shared drive (5.26 GB)	\$900.00	0.60			0.6		\$540.00		
05/05/2020	Rachel Steyer (RLS)	email to MTJ and GBW regarding whether ptoential class members would qualify as declarants	\$775.00	0.70			0.7		\$542.50		
05/05/2020	Ryan Bonner (RAB)	Downloading and Uploading Assert production ASSERT017 for hosting on Relativity and shared drive (~13.00 GB)	\$900.00	1.30			1.3		\$1,170.00		
05/05/2020	Lourdes Castro (LEC)	downloading and saving Bates stamped documents in the case folder	\$450.00	0.40			0.4		\$180.00		
05/05/2020	Rachel Steyer (RLS)	conversations with class members to gather information to fill in declarations, final read through conversation, scheduling follow up calls, drafting and editing declarations, reviewing documents	\$775.00	6.60			6.6		\$5,115.00		
05/05/2020	Lourdes Castro (LEC)	Working on adding information in the Sunrise Assessment spreadsheet for the Heredia matter	\$450.00	3.40			3.4		\$1,530.00		
05/05/2020	Travis Close (TCC)	review notes from list of potential declarants shared by co-counsel	\$888.00	0.30					\$266.40		
05/05/2020	Travis Close (TCC)	review/analyze depo of Slichtha	\$888.00	0.70					\$621.60		
05/05/2020	Guy Wallace (GBW)	tc with Allyn; Gorman; BU; RC re Fearn depo; privilege log	\$1,188.00	0.50					\$594.00		
05/05/2020	Guy Wallace (GBW)	com's with BU re meet and confer with Defendants re discovery disputes	\$1,188.00	0.30					\$356.40		
05/05/2020	Guy Wallace (GBW)	revise and edit draft of Flores declaration	\$1,188.00	0.90					\$1,069.20		
05/05/2020	Guy Wallace (GBW)	com's with Marks; CJH; MT; BU; MTJ re same	\$1,188.00	0.20					\$237.60		
05/06/2020	Lourdes Castro (LEC)	Working on adding information in the Sunrise Assessment spreadsheet for the Heredia matter	\$450.00	6.20			6.2		\$2,790.00		
05/06/2020	Rachel Steyer (RLS)	conversations with class members to prepare and finalize declarations, exchanging emails, drafting and editing declarations	\$775.00	7.50			7.5		\$5,812.50		
05/06/2020	Guy Wallace (GBW)	review and analysis of letter from Maryott of 4/27/20 and Umpierre draft response thereto	\$1,188.00	1.60					\$1,900.80		
05/06/2020	Guy Wallace (GBW)	revise and edit draft declaration of Schriffin	\$1,188.00	0.40					\$475.20		
05/06/2020	Guy Wallace (GBW)	com's with RLS re same	\$1,188.00	0.20					\$237.60		
05/06/2020	Guy Wallace (GBW)	review and analysis of Slichtha deposition testimony	\$1,188.00	3.70					\$4,395.60		
05/07/2020	Lourdes Castro (LEC)	calendar call per MTJ's email	\$450.00	0.10			0.1		\$45.00		
05/07/2020	Ryan Bonner (RAB)	QC'ing April document production requests from Co-Counsel (re: Relativity hosting)	\$900.00	1.20			1.2		\$1,080.00		
05/07/2020	Lourdes Castro (LEC)	communication with MTJ re Data Collection assessment	\$450.00	0.10			0.1		\$45.00		

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
05/07/2020	Lourdes Castro (LEC)	Working on adding information in the Sunrise Assessment spreadsheet for the Heredia matter	\$450.00	1.50			\$675.00				
05/07/2020	Rachel Steyer (RLS)	conversations with class members to gather information for declarations, final read through/clarifying last minute information, drafting and editing delcarations, attempting outreach, leaving VMs, setting up follow up calls	\$775.00	7.70			\$5,967.50	1.5	\$675.00		
05/07/2020	Mark Johnson (MTJ)	Call w/ D.Marks, Healey, GBW re evidence and arguments iso class cert motion, Flores declaration iso same, results of sample review of staffing by acuity, task time analysis	\$888.00	1.20			\$1,065.60				
05/07/2020	Mark Johnson (MTJ)	call w/ GBW re class cert strategy, Flores declaration, evidence iso mtn	\$888.00	0.50			\$444.00				
05/07/2020	Mark Johnson (MTJ)	Follow-up call w/ GBW re class cert motion planning, discussing w/ D Marks re Flores declaration	\$888.00	0.50			\$444.00				
05/07/2020	Mark Johnson (MTJ)	further conervation w/ GBW analyzing strengths and weaknesses of arguments and evidence iso class certification motion based on earlier conversation w/ Marks and Healey	\$888.00	0.80			\$710.40				
05/07/2020	Mark Johnson (MTJ)	email coms w/ R Steyer re class member decs iso class certification	\$888.00	0.30			\$266.40				
05/07/2020	Mark Johnson (MTJ)	review draft of Flores dec iso class cert motion for call w/ Marks, Healey re same	\$888.00	0.40			\$355.20				
05/07/2020	Guy Wallace (GBW)	tc with Marks; CJH; MT; MTJ re draft declaration of Dr. Flores and expert opinions of same	\$1,188.00	0.90			\$1,069.20				
05/07/2020	Guy Wallace (GBW)	com's with CJH re draft declaration of Dr. Flores, and revisions re same	\$1,188.00	0.50			\$594.00				
05/07/2020	Guy Wallace (GBW)	com's with BU re D's letter of April 27, 2020, and P's response thereto	\$1,188.00	0.80			\$950.40				
05/07/2020	Guy Wallace (GBW)	com's with MTJ re P's theory of class certification and challenges to Sunrise's policies and procedures re staffing preparation and drafting of new points for class certification motion and declaration of Dr. Flores re defects in D's policies and procedures re staffing	\$1,188.00	1.40			\$1,663.20				
05/07/2020	Guy Wallace (GBW)	analysis of D's demand for all documents produced from third parties such as class members, whether same implicates privileges, and need for a privilege log is privileges are asserted	\$1,188.00	0.30			\$356.40				
05/07/2020	Guy Wallace (GBW)	tc with MTJ re same	\$1,188.00	0.20			\$237.60				
05/07/2020	Guy Wallace (GBW)	legal research and analysis re J. Staton's decision re class certification and settlement approval in the In re Kia Engine case and discussion of common questions and Wolin v. Jaguar therein	\$1,188.00	0.80			\$950.40				
05/08/2020	Rachel Steyer (RLS)	updating TB re Heredia outreach/declaration drafting status	\$775.00	0.30			\$232.50	0.3	\$232.50		
05/08/2020	Lourdes Castro (LEC)	working on the data collection spreadsheet	\$450.00	1.10			\$495.00	1.1	\$495.00		
05/08/2020	Rachel Steyer (RLS)	editing declarations, class calls	\$775.00	6.00			\$4,650.00	6	\$4,650.00		

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions									
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees		
							Hrs		Hrs		Hrs		Hrs		Hrs	
05/08/2020	Mark Johnson (MTJ)	call w/ GBW re strategic issues re agruments and evidence iso class certification	\$888.00	0.60		\$532.80										
05/08/2020	Mark Johnson (MTJ)	call w/ GBW re P declarations and strategy for presenting evidence of adequacy of representation	\$888.00	0.20		\$177.60										
05/08/2020	Guy Wallace (GBW)	preparation and drafting of section re Plaintiffs' policy and procedure based challenge to Sunrise's staffing methodology and system	\$1,188.00	4.70		\$5,583.60										
05/08/2020	Mark Johnson (MTJ)	revise draft ltr to OC responding to demand for class cert related expert disclosures	\$888.00	0.30		\$266.40										
05/08/2020	Mark Johnson (MTJ)	email exchanges w/ COC Healey, Marks, Umpierre re draft ltr responding to demands for class cert expert disclosures, availability of materials for production	\$888.00	0.40		\$355.20										
05/08/2020	Guy Wallace (GBW)	review and analysis of Exhibit 26, scoring matrix, and sections of Sunrise operations manual identified by MT re standard staffing formula	\$1,188.00	2.10		\$2,494.80										
05/08/2020	Guy Wallace (GBW)	com's with CJH re defects in Sunrise's policies and procedures regarding staffing	\$1,188.00	0.60		\$712.80										
05/08/2020	Guy Wallace (GBW)	com's with MTJ re defects in Sunrise's policies and procedures re staffing and how to frame P's challenge thereto	\$1,188.00	0.80		\$950.40										
05/08/2020	Guy Wallace (GBW)	com's with BU; MTJ re preparation of declarations from Fearn; Ganz re class certification and duties of proposed class representatives	\$1,188.00	0.30		\$356.40										
05/08/2020	Guy Wallace (GBW)	review and analysis of com's from Marks re further draft of Declaration of Dr. Flores	\$1,188.00	0.40		\$475.20										
05/08/2020	Mark Johnson (MTJ)	call w/ GBW re Flores declaration and utilization of argument based on lack of correlation of staffing to acuity	\$888.00	0.30		\$266.40										
05/08/2020	Mark Johnson (MTJ)	draft analysis of potential responses to depo questions directed to expert based on positions stated in declawration per com w/ GBW	\$888.00	0.70		\$621.60										
05/08/2020	Mark Johnson (MTJ)	review and analyze outline of Flores declaration and commentary from D. Marks	\$888.00	0.10		\$88.80										
05/08/2020	Mark Johnson (MTJ)	draft response re concerns about correlation argument.	\$888.00	0.20		\$177.60										
05/09/2020	Mark Johnson (MTJ)	review CH changes to GBW outline of argument challenging Sunrise Staffing methodology	\$888.00	0.10		\$88.80										
05/09/2020	Mark Johnson (MTJ)	draft email to GBW with comments on same	\$888.00	0.20		\$177.60										
05/09/2020	Guy Wallace (GBW)	revise and edit draft of challenge to D's policies and procedures re staffing	\$1,188.00	0.80		\$950.40										
05/09/2020	Guy Wallace (GBW)	com's with CJH; MTJ re same	\$1,188.00	0.40		\$475.20										
05/10/2020	Guy Wallace (GBW)	review and analysis of revised section re Sunrise's policies and procedures re caregiver staffing and the defects in same	\$1,188.00	1.30		\$1,544.40										
05/10/2020	Guy Wallace (GBW)	revise and edit same	\$1,188.00	0.20		\$237.60										
05/10/2020	Guy Wallace (GBW)	com's with CJH; MTJ re same (.3)	\$1,188.00	0.30		\$356.40										
05/10/2020	Guy Wallace (GBW)	revise and edit draft response from BU to D's 4/27/20 letter re discovery issues	\$1,188.00	0.70		\$831.60										

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions						
				Worked			General	CC Confs	Falkenberg	Travel	Fees	Fees	
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
05/10/2020	Guy Wallace (GBW)	com's with BU and MTJ re same	\$1,188.00	0.20									
05/10/2020	Guy Wallace (GBW)	com to Maryott; Allyn; Gorman re meet and confer re class certification motion	\$1,188.00	0.10									
05/10/2020	Mark Johnson (MTJ)	call w/ GBW re argument for brief re flaw in staffing model, changes to same	\$888.00	0.20									
05/11/2020	Lourdes Castro (LEC)	downloading and saving documents in folder case re depositon of Slichta, Jeff	\$450.00	0.60		0.6	\$270.00						
05/11/2020	Lourdes Castro (LEC)	Working on adding information in the Sunrise Assessment spreadsheet for the Heredia matter	\$450.00	0.40		0.4	\$180.00						
05/11/2020	Rachel Steyer (RLS)	editing draft declarations, conducting final read through with class member, leaving VMs	\$775.00	7.70		7.7	\$5,967.50						
05/11/2020	Travis Close (TCC)	review recent co-counsel correspondence re: task times analysis in prep for class cert motion	\$888.00	0.40									
05/11/2020	Travis Close (TCC)	review GBW's draft statement of Ps policy and procedure challenge	\$888.00	0.20									
05/11/2020	Mark Johnson (MTJ)	participate in meet and confer w/ OC re class certification motiion	\$888.00	0.20									
05/11/2020	Mark Johnson (MTJ)	review and edit CH declaration iso class certification	\$888.00	1.10									
05/11/2020	Mark Johnson (MTJ)	email to GBW re same	\$888.00	0.20									
05/11/2020	Mark Johnson (MTJ)	research re ability to file declarations with docu-sign signatures	\$888.00	0.10									
05/11/2020	Mark Johnson (MTJ)	email to co-counsel re same	\$888.00	0.10									
05/11/2020	Mark Johnson (MTJ)	further emails re strategy for getting signatures.	\$888.00	0.10									
05/11/2020	Guy Wallace (GBW)	tc with Allyn; Gorman; MTJ re meet and confer re class cert motion	\$1,188.00	0.40									
05/11/2020	Guy Wallace (GBW)	preparation for meet and confer with D's re class cert motion	\$1,188.00	0.10									
05/11/2020	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20									
05/11/2020	Guy Wallace (GBW)	com's with BU re response to D's letter of 4/27 and meet and confer efforts re same	\$1,188.00	0.30									
05/11/2020	Guy Wallace (GBW)	review and analysis of draft declaration of Stanton	\$1,188.00	0.30									
05/11/2020	Guy Wallace (GBW)	com's with RLS re same and MAY; BU; MTJ re status of outreach for declarations from putative class members	\$1,188.00	0.20									
05/11/2020	Guy Wallace (GBW)	review and analysis of revised version of class cert brief	\$1,188.00	0.60									
05/11/2020	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20									
05/12/2020	Rachel Steyer (RLS)	reviewing and finalizing edits on draft delcarations with MTJ and GBW, conducting final read throughs with class members	\$775.00	8.00		8	\$6,200.00						
05/12/2020	Guy Wallace (GBW)	com's with CJH; MTJ re declaration of Dr. Flores and opinions therein	\$1,188.00	0.60									
05/12/2020	Guy Wallace (GBW)	legal research re Nguyen and Wolin decisions by Ninth Circuit, and issue of risks associated with alleged defect	\$1,188.00	0.90									
05/12/2020	Mark Johnson (MTJ)	call w/ GBW re Healey declaration iso class certification and proposed edits to same	\$888.00	0.50									
05/12/2020	Mark Johnson (MTJ)	review and edit draft declarations from class member relatives	\$888.00	1.30									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions									
				Worked			General Hrs	Fees	CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees		
05/12/2020	Mark Johnson (MTJ)	coms w/ Rachel Steyer re same	\$888.00	0.20		\$177.60										
05/12/2020	Mark Johnson (MTJ)	review draft of Plaintiff dec iso class certification	\$888.00	0.20		\$177.60										
05/12/2020	Mark Johnson (MTJ)	email w/ COC re plan / format for identification of exhibits iso class cert mtn	\$888.00	0.10		\$88.80										
05/12/2020	Guy Wallace (GBW)	com's with MTJ re CJH declaration re class certification and revisions thereto	\$1,188.00	0.60		\$712.80										
05/13/2020	Ryan Bonner (RAB)	Retrieving and uploading production SUN20 to shared E:drive and ftp hosting for Relativity	\$900.00	0.40		\$360.00	0.4	\$360.00								
5/13/2020	Rachel Steyer (RLS)	finalizing declarations, communicating and corresponding with class members and members of our firm re editing, drafting	\$775.00	6.60		\$5,115.00	6.6	\$5,115.00								
05/13/2020	Travis Close (TCC)	Review/analyze RLS's declaration drafts progress and GBW's edits to her declarations	\$888.00	0.50		\$444.00										
05/13/2020	Guy Wallace (GBW)	com's with CJH re preparation of motion for class certification	\$1,188.00	0.30		\$356.40										
05/13/2020	Guy Wallace (GBW)	com's with MTJ re preparation of motion for class certification	\$1,188.00	0.40		\$475.20										
05/13/2020	Guy Wallace (GBW)	com's with RLS re preparation of putative class member declarations re motion for class certification	\$1,188.00	0.20		\$237.60										
05/13/2020	Mark Johnson (MTJ)	coms w/ R Steyer re class member declarations	\$888.00	0.10		\$88.80										
05/14/2020	Lourdes Castro (LEC)	calendar call with co-counsel and emailing MTJ re same	\$450.00	0.20		\$90.00	0.2	\$90.00								
05/14/2020	Lourdes Castro (LEC)	Working on adding information in the Sunrise Assessment spreadsheet	\$450.00	2.00		\$900.00	2	\$900.00								
05/14/2020	Rachel Steyer (RLS)	finalizing all drafts and verifying for signature, communicaitons within our firm, final call with declarant to prepare and draft declaration	\$775.00	7.70		\$5,967.50	7.7	\$5,967.50								
05/14/2020	Guy Wallace (GBW)	review and analysis of further draft of class certification brief	\$1,188.00	0.40		\$475.20										
05/14/2020	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20		\$237.60										
05/14/2020	Guy Wallace (GBW)	review and analysis of draft Declaration of Dr. Kennedy	\$1,188.00	2.80		\$3,326.40										
05/14/2020	Guy Wallace (GBW)	revise and edit same	\$1,188.00	0.60		\$712.80										
05/14/2020	Guy Wallace (GBW)	com's with CJH; MTJ re same (.4)	\$1,188.00	0.40		\$475.20										
05/14/2020	Guy Wallace (GBW)	revise and edit draft declaration of Fearn	\$1,188.00	0.70		\$831.60										
05/14/2020	Guy Wallace (GBW)	com's with CJH; BU; MTJ re same	\$1,188.00	0.50		\$594.00										
05/14/2020	Guy Wallace (GBW)	com's with RLS; MTJ re declarations of putative class members	\$1,188.00	0.40		\$475.20										
05/14/2020	Guy Wallace (GBW)	review and analysis of draft declaration of Dr. Flores	\$1,188.00	1.10		\$1,306.80										
05/14/2020	Guy Wallace (GBW)	revise and edit same	\$1,188.00	0.80		\$950.40										
05/14/2020	Guy Wallace (GBW)	com's with CJH; MTJ re same (.3)	\$1,188.00	0.30		\$356.40										
05/14/2020	Mark Johnson (MTJ)	calls w/ GBW re Kennedy and Flores declarations, filing logistics, appendices of class member declarations, DSS flings and complaints	\$888.00	0.60		\$532.80										
05/15/2020	Rachel Steyer (RLS)	Heredia conference call re class certification filing	\$775.00	0.40		\$310.00	0.4	\$310.00								
05/15/2020	Lourdes Castro (LEC)	conference call with the team and co-co re motion for class cert filing comm's w/ MTJ and GBW re same	\$450.00	0.50		\$225.00			0.5	225						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
05/15/2020	Lourdes Castro (LEC)	Comms w MTJ and GBW re Class cert motion filing	\$450.00	0.30			\$135.00				
05/15/2020	Lourdes Castro (LEC)	Working on adding information in the Sunrise Assessment spreadsheet	\$450.00	4.70			\$2,115.00				
5/15/2020	Lourdes Castro (LEC)	working on appendix for class cert motion comms w MTJ and GBW re same	\$450.00	1.00			\$450.00				
05/15/2020	Rachel Steyer (RLS)	reviewing declarations from co-counsel, finalizing last declaration from class member, correspondence within our firm with GBW and MTJ	\$775.00	2.40			\$1,860.00				
05/15/2020	Guy Wallace (GBW)	revise and edit class certification brief	\$1,188.00	2.60			\$3,088.80				
05/15/2020	Guy Wallace (GBW)	com's with CJH; MAY; BU; MTJ re preparation of class certification motion and remaining tasks re same	\$1,188.00	0.80			\$950.40				
05/15/2020	Guy Wallace (GBW)	com's with CJH; BU re declaration of Fearn and issue re move-in fee and response thereto	\$1,188.00	0.60			\$712.80				
05/15/2020	Guy Wallace (GBW)	com's with MTJ re preparation of proposed Order re class certification	\$1,188.00	0.30			\$356.40				
05/15/2020	Guy Wallace (GBW)	preparation and drafting of Declaration of GBW re class certification and adequacy of counsel	\$1,188.00	1.80			\$2,138.40				
05/15/2020	Guy Wallace (GBW)	com's with CJH; MAY re same (.3)	\$1,188.00	0.30			\$356.40				
05/15/2020	Guy Wallace (GBW)	review and analysis of draft declarations of class members in support of class certification	\$1,188.00	0.90			\$1,069.20				
05/15/2020	Guy Wallace (GBW)	com's with MAY; RF; RLS re same	\$1,188.00	0.40			\$475.20				
05/15/2020	Guy Wallace (GBW)	com's with MTJ; RLS; LEC re preparation of motion for class certification, remaining tasks re same and filing thereof	\$1,188.00	0.40			\$475.20				
05/15/2020	Mark Johnson (MTJ)	call w/ COC team members re logistics for filing class cert motion and related papers.	\$888.00	0.40			\$355.20		0.4		355.2
05/15/2020	Mark Johnson (MTJ)	call with Brian Umpierre re motion to file under seal, redaction issues and interpretation of local rules	\$888.00	0.40			\$355.20				
05/15/2020	Mark Johnson (MTJ)	call w/ GBW, LEC re planning for class cert filings	\$888.00	0.20			\$177.60				
05/15/2020	Mark Johnson (MTJ)	review 8 variations of residency agreements and compare to language in exhibit table showing variations and against primary agreement.	\$888.00	4.80			\$4,262.40				
05/15/2020	Mark Johnson (MTJ)	email to Healey re analysis of residency agreement variation and revised table of differences for exhibit to declaration.	\$888.00	0.10			\$88.80				
05/15/2020	Mark Johnson (MTJ)	call w/ GBW re pros and cons of inclusion of Schroyer declaration in filing	\$888.00	0.40			\$355.20				
05/15/2020	Mark Johnson (MTJ)	coms w/ Brian Umpierre re access to residency agreement variations; scope of review of same	\$888.00	0.10			\$88.80				
05/15/2020	Mark Johnson (MTJ)	coms w/ GBW, CH re inclusion of other agreement examples as exhibits to declaration	\$888.00	0.10			\$88.80				
05/15/2020	Mark Johnson (MTJ)	calls w/ GBW re Flores declaration, class member declarations, arguments re staffing analysis for class cert brief	\$888.00	0.60			\$532.80				
05/16/2020	Guy Wallace (GBW)	review and analysis of further draft of Fearn Declaration re class cert motion	\$1,188.00	0.50			\$594.00				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General Hrs	Fees	CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees	
05/16/2020	Guy Wallace (GBW)	com's with CJH; BU; MTJ re same	\$1,188.00	0.20		\$237.60									
05/16/2020	Guy Wallace (GBW)	review and analysis of proposed revisions to declaration of Dr. Flores	\$1,188.00	0.70		\$831.60									
05/16/2020	Mark Johnson (MTJ)	review and proposed edits to expert declaration of C. Flores iso class certification	\$888.00	1.50		\$1,332.00									
05/16/2020	Mark Johnson (MTJ)	begin drafting proposed order on mtn for class certification.	\$888.00	3.50		\$3,108.00									
05/16/2020	Mark Johnson (MTJ)	review next draft of expert C. Flores declaration	\$888.00	0.70		\$621.60									
05/16/2020	Mark Johnson (MTJ)	coms w/ C Healey re same	\$888.00	0.10		\$88.80									
05/17/2020	Guy Wallace (GBW)	revise and edit declaration of GBW in support of class certification motion	\$1,188.00	0.50		\$594.00									
05/17/2020	Guy Wallace (GBW)	com's with co-counsel re same	\$1,188.00	0.30		\$356.40									
05/17/2020	Guy Wallace (GBW)	revise and edit motion for class certification	\$1,188.00	2.40		\$2,851.20									
05/17/2020	Guy Wallace (GBW)	com's with CJH re preparation of motion for class certification and revisions thereto	\$1,188.00	0.40		\$475.20									
05/17/2020	Guy Wallace (GBW)	revise and edit proposed Order granting class certification	\$1,188.00	0.50		\$594.00									
05/17/2020	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.40		\$475.20									
05/17/2020	Mark Johnson (MTJ)	continue working on prroposed order and integration of citations to declarations and exhibits for same.	\$888.00	5.70		\$5,061.60									
05/18/2020	Rachel Steyer (RLS)	moving documents to proper folder	\$775.00	0.10		\$155.00	0.1	\$77.50							
05/18/2020	Rachel Steyer (RLS)	correspondence within our firm	\$775.00	0.10		\$77.50	0.1	\$77.50							
05/18/2020	Lourdes Castro (LEC)	printing signed declarations for MTJ to check for Motion for Class cert	\$450.00	0.60		\$270.00	0.6	\$270.00							
05/18/2020	Lourdes Castro (LEC)	drafting appendix re Mtn to Class Cert	\$450.00	0.50		\$225.00	0.5	\$225.00							
05/18/2020	Tyler Smith (TBS)	Combine exhibits with cover pages for Declarations for class cert mtn.	\$500.00	0.50		\$250.00	0.5	\$250.00							
05/18/2020	Lourdes Castro (LEC)	Preparing and getting documents ready for filing	\$450.00	4.80		\$2,160.00	4.8	\$2,160.00							
05/18/2020	Lourdes Castro (LEC)	filing declarations iso Mtn for class cert	\$450.00	1.30		\$585.00	1.3	\$585.00							
05/18/2020	Lourdes Castro (LEC)	checking final documents to have them ready for filing	\$450.00	0.60		\$270.00	0.6	\$270.00							
05/18/2020	Travis Close (TCC)	Meet with MTJ re: strategy for filing class cert motion	\$888.00	0.30		\$266.40									
05/18/2020	Travis Close (TCC)	Begin proofreading decs and searching for individual issues/reasons for concern	\$888.00	1.60		\$1,420.80									
05/18/2020	Guy Wallace (GBW)	revise and edit class certification brief; declaration of GBW re class certification	\$1,188.00	2.80		\$3,326.40									
05/18/2020	Guy Wallace (GBW)	com's with CJH; Marks; MTJ re same	\$1,188.00	0.80		\$950.40									
05/18/2020	Travis Close (TCC)	Continue reviewing/analyzing declarations iso class cert for deficiencies (mollie birney, peter falkenberg, carol gosho, kathy hartoch, guy jara, angel hession, denise gurgens, sharol morgan, grace ferguson, julie vernon, elizabeth roberts)	\$888.00	1.60		\$1,420.80				1.6	1,420.80				
05/18/2020	Travis Close (TCC)	Continue reviewing/analyzing declarations iso class cert for deficiencies (linda lahman, steve kurtzman, seth warner, tanya wicht, douglas thyberg, danlin chen, steve kurtzman, kathleen travers, diane cuevas-paleskim, temma roby)	\$888.00	1.20		\$1,065.60									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs		Hrs		Hrs		Hrs	
05/18/2020	Travis Close (TCC)	Meet w/ GBW to finalize list of class memeber declarations	\$888.00	0.30		\$266.40								
05/18/2020	Travis Close (TCC)	Compile exhibits for GBW declaration iso class cert	\$888.00	0.50		\$444.00								
05/18/2020	Travis Close (TCC)	Finalize declarant list / cover page of class member declarations	\$888.00	0.50		\$444.00								
05/18/2020	Travis Close (TCC)	Create cover sheets for exhibits 200-312	\$888.00	0.80		\$710.40								
05/18/2020	Guy Wallace (GBW)	revise and edit proposed order granting class certification; com's with MTJ re same	\$1,188.00	0.60		\$712.80								
05/18/2020	Guy Wallace (GBW)	revise and edit declaration of GBW re class certification	\$1,188.00	0.50		\$594.00								
05/18/2020	Guy Wallace (GBW)	com's with TCC re same	\$1,188.00	0.20		\$237.60								
05/18/2020	Guy Wallace (GBW)	revise and edit Appendix of putative class member declarations	\$1,188.00	0.70		\$831.60								
05/18/2020	Guy Wallace (GBW)	com's with TCC and LEC re same	\$1,188.00	0.20		\$237.60								
05/18/2020	Guy Wallace (GBW)	com's with CJH; MTJ; BU re preparation and filing of declaration of Megan Yarnall and exhibits thereto	\$1,188.00	0.50		\$594.00								
05/18/2020	Travis Close (TCC)	Coordinate remaining filings for class cert motion QC'ing the removal of SUN0004196-0004202 and SUN0004222-0004229 from Relativity according to Clawback letter	\$888.00	1.70		\$1,509.60								
05/19/2020	Ryan Bonner (RAB)	checking for judge's orders and CA central district re chamber copies	\$900.00	0.30		\$270.00	0.3	\$270.00						
05/19/2020	Lourdes Castro (LEC)	communication with TBS re CA central district chamber copies	\$450.00	1.20		\$540.00	1.2	\$540.00						
05/19/2020	Lourdes Castro (LEC)	downloading depo videos sent from TSG	\$450.00	0.10		\$45.00	0.1	\$45.00						
05/19/2020	Lourdes Castro (LEC)	communication with Co-Counsel and MTJ re chamber copies	\$450.00	0.40		\$180.00	0.4	\$180.00						
05/19/2020	Lourdes Castro (LEC)	research whether chamber copies are required for class cert motion	\$450.00	0.30		\$135.00	0.3	\$135.00						
05/19/2020	Travis Close (TCC)	review judge's instructions re: chambers copies, filing under seal, and covid-19 orders	\$888.00	0.30		\$266.40								
05/19/2020	Travis Close (TCC)	review and analysis of revised version of class cert brief in 14 point font, including revisions thereto from CJH	\$888.00	0.40		\$355.20								
05/19/2020	Guy Wallace (GBW)	review and analysis of com's from Gorman re P's class cert motion	\$1,188.00	1.10		\$1,306.80								
05/19/2020	Guy Wallace (GBW)	com's with CJH; BU; MTJ re responses thereto	\$1,188.00	0.40		\$475.20								
05/19/2020	Guy Wallace (GBW)	call w/ Umpierre and Healey re strategy for responding to demands from OC re expert materials, revised brief, redactions.	\$1,188.00	0.20		\$237.60								
05/19/2020	Mark Johnson (MTJ)	PRINTING AND PUTTING TOGETHER CHAMBERS COPIES	\$888.00	0.50		\$444.00								
05/20/2020	Lourdes Castro (LEC)	multiple emails and calls w/ Healey, Umpierre and Lucy Valdez re filing of corrected motion, preparation of revised redacted and highlighted documents, information needed to responding to questions and demands from opposing counsel	\$450.00	3.40		\$1,530.00	3.4	\$1,530.00						
05/20/2020	Mark Johnson (MTJ)	research re rule 26 obligations on expert declaration iso motion for response to OC demands for expert materials	\$888.00	0.70		\$621.60								
05/20/2020	Mark Johnson (MTJ)		\$888.00	0.20		\$177.60								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
05/20/2020	Mark Johnson (MTJ)	review corrected brief and highlighted/redacted versions of same before providing same to OC.	\$888.00	0.30		\$266.40									
05/22/2020	Mark Johnson (MTJ)	call w/ COC Healey and Umpierre re strategy on various issues that are subject of meet and confer session with OC Gorman for next day (Sat)	\$888.00	0.70		\$621.60									
05/22/2020	Mark Johnson (MTJ)	research re applicability of FRCP26(a)(2)(B) to expert declarations	\$888.00	0.50		\$444.00									
05/22/2020	Mark Johnson (MTJ)	review and respond to emails from COC re issues presented for meet and confer session and strateg for same	\$888.00	0.20		\$177.60									
05/23/2020	Mark Johnson (MTJ)	telephonic meet and confer w/ BU and OC Maryott, Gorman and Allyn re issues w/ class cert filing, rogs rfps, sealing motion and other items.	\$888.00	1.00		\$888.00									
05/23/2020	Mark Johnson (MTJ)	draft summary of meet and confer results for file, COC	\$888.00	0.30		\$266.40									
05/23/2020	Mark Johnson (MTJ)	follow up coms w/ COC Healey, Umpierre, wallace	\$888.00	0.20		\$177.60									
05/26/2020	Mark Johnson (MTJ)	review draft proposed stiputlaion re extending time to file declaration iso sealing docuemnts	\$888.00	0.10		\$88.80									
05/26/2020	Mark Johnson (MTJ)	coms w Brian U and Chris H re same	\$888.00	0.10		\$88.80									
05/26/2020	Mark Johnson (MTJ)	proposed edits to stip	\$888.00	0.10		\$88.80									
05/26/2020	Mark Johnson (MTJ)	com w/ Joe Gordon re status	\$888.00	0.10		\$88.80									
05/27/2020	Lourdes Castro (LEC)	communication with MTJ re checking/calendaring dates for conf call	\$450.00	0.20		\$90.00		0.2	\$90.00						
05/27/2020	Lourdes Castro (LEC)	calendaring call wih re conference w/ COC re Defendant's demands	\$450.00	0.10		\$45.00		0.1	\$45.00						
05/27/2020	Travis Close (TCC)	review/analyze letter from opposing counsel re: supposed improper declaration of chris healey files iso class cert	\$888.00	0.30		\$266.40									
05/27/2020	Travis Close (TCC)	Review/analyze dec of chris healy iso class cert to check factual accuracy of claims by opposing counsel in meet & confer letter	\$888.00	0.40		\$355.20									
05/27/2020	Mark Johnson (MTJ)	review and draft edits to draft rewpnse to D's third set of document requests	\$888.00	0.30		\$266.40									
05/27/2020	Mark Johnson (MTJ)	coms w/ COC Healey and Umpierre re same	\$888.00	0.20		\$177.60									
05/28/2020	Lourdes Castro (LEC)	adding up total hours re spreadsheet data collection and comm's with Cnsl re same	\$450.00	0.40		\$180.00		0.4	\$180.00						
05/28/2020	Mark Johnson (MTJ)	review correspondence from OC re expert disclosures and Healey declaration and compare declaration to ltr identifying allegedly improper paragraphs to prepare for call w/ COC re strategy for responding to same.	\$888.00	1.40		\$1,243.20									
05/28/2020	Mark Johnson (MTJ)	call w/ COC Healey, Umpierre, Cocchia re respons to D's demand for class cert expert disclosures, demand for replacement of Healey declaration, damand for stip extending time for taking expert depos, discovey of PSS data and motion to compel.	\$888.00	1.70		\$1,509.60									

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				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
05/28/2020	Mark Johnson (MTJ)	call w/ GBW re strategy for addressing D demand for replacement of Healey declaration iso class cert motion; possible scenarios depending on position taken	\$888.00	0.50		\$444.00									
05/28/2020	Mark Johnson (MTJ)	com re draft letter concerning expert disclosures.	\$888.00	0.20		\$177.60									
05/28/2020	Mark Johnson (MTJ)	draft ltr to OC responding to demand for class cert related expert disclosures, proposed stip for extending date for expert depositions	\$888.00	2.50		\$2,220.00									
05/29/2020	Rachel Steyer (RLS)	gathering communications and documents from class members to prepare for privilege log	\$775.00	1.80		\$1,395.00	1.8	\$1,395.00							
05/29/2020	Mark Johnson (MTJ)	review and revise draft motion to compel production of assessment data in electronic form	\$888.00	0.50		\$444.00									
05/29/2020	Mark Johnson (MTJ)	com w/ COC re same.	\$888.00	0.20		\$177.60									
05/29/2020	Mark Johnson (MTJ)	further analysis and comparison of class cert brief, Healey dec and ltr from OC for response to OC re demand for "corrected" Healey declaration.	\$888.00	1.50		\$1,332.00									
05/29/2020	Mark Johnson (MTJ)	call w/ GBW re Healey declaration and arguments in opposition to potential motion to strike	\$888.00	0.20		\$177.60									
05/29/2020	Mark Johnson (MTJ)	review resume's of three potential experts for mttn to compare assessment data	\$888.00	0.20		\$177.60									
05/29/2020	Mark Johnson (MTJ)	coms /w COC re same	\$888.00	0.20		\$177.60									
06/01/2020	Mark Johnson (MTJ)	review joint statement re motion to compel production of assessment data	\$888.00	0.40		\$355.20									
06/01/2020	Travis Close (TCC)	Review/analyze Ds Dec iso motion to seal Ps filings	\$888.00	0.50		\$444.00									
06/02/2020	Rachel Steyer (RLS)	compiling and preparing privilege and document logs	\$775.00	2.00		\$1,550.00	2	\$1,550.00							
06/03/2020	Rachel Steyer (RLS)	preparing and reviewing privilege logs	\$775.00	1.90		\$1,472.50	1.9	\$1,472.50							
06/03/2020	Mark Johnson (MTJ)	respond to OC remail re Healey class cert declaration.	\$888.00	0.10		\$88.80									
06/04/2020	Mark Johnson (MTJ)	call w/ GBW to discuss schedule on class cert briefing and relationship to other motions, strategy for same	\$888.00	0.20		\$177.60									
06/04/2020	Mark Johnson (MTJ)	calls w/ GBW (x2) re Healey class cert declaration, analysis of D's proposed language to be stricken; strategy for response.	\$888.00	0.60		\$532.80									
06/04/2020	Guy Wallace (GBW)	review and analysis of D's redline version of CJH Declaration	\$1,188.00	1.00		\$1,188.00									
06/04/2020	Guy Wallace (GBW)	com's with CJH; MTJ re response thereto and potential revisions to same	\$1,188.00	0.20		\$237.60									
06/05/2020	Rachel Steyer (RLS)	emails with cocounsel, discussing and reviewing privilege logs	\$775.00	0.30		\$232.50	0.3	\$232.50							
06/05/2020	Travis Close (TCC)	Review/analyze dec of William B Peters iso Ps motion to compel further production of assessment and service plan data	\$888.00	0.30		\$266.40									
06/05/2020	Travis Close (TCC)	review MTJ's may 29 letter re: corrected declaration of chris healey	\$888.00	0.10		\$88.80									
06/05/2020	Travis Close (TCC)	Review Ps supplemental production in response to Ds set one interogs Nos 20-21	\$888.00	0.20		\$177.60									
06/05/2020	Travis Close (TCC)	review letter from BU to Defendants re: Defendants' deficient discovery responses	\$888.00	0.20		\$177.60									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs		Hrs		Hrs		Hrs	
06/05/2020	Travis Close (TCC)	review letter from BU to Defendants re: Defs' deficient ESI search term proposal and counter-proposal	\$888.00	0.20		\$177.60								
06/05/2020	Guy Wallace (GBW)	review and analysis of CJH declaration re class certification and evaluation of D's objections re same w/r/t material that is objectionable or non-objectionable	\$1,188.00	1.20		\$1,425.60								
06/08/2020	Rachel Steyer (RLS)	communications with co-counsel regarding finalizing privilege logs, reviewing documents and emails	\$775.00	0.20		\$155.00	0.2	\$155.00						
06/08/2020	Mark Johnson (MTJ)	review and analyze revised Healey declaration	\$888.00	1.20		\$1,065.60								
06/08/2020	Mark Johnson (MTJ)	review cases cited by Ds in letter demanding revised Healey declaration and research additional authority on attorney declarations	\$888.00	1.40		\$1,243.20								
06/08/2020	Mark Johnson (MTJ)	call w/ GBW re revisions to Healey declaration and strategy re same	\$888.00	0.30		\$266.40								
06/08/2020	Mark Johnson (MTJ)	email exchange w/ OC re response to demand for revised Healey declaration	\$888.00	0.10		\$88.80								
06/08/2020	Guy Wallace (GBW)	review and analysis of revised version of declaration of CJH re class certification;	\$1,188.00	0.80		\$950.40								
06/08/2020	Guy Wallace (GBW)	com's with MTJ re same (.3)	\$1,188.00	0.30		\$356.40								
06/09/2020	Rachel Steyer (RLS)	preparing and reviewing privilege logs for class cert declarants and putative class members	\$775.00	3.00		\$2,325.00	3	\$2,325.00						
06/09/2020	Travis Close (TCC)	Review/analyze Ps 3rd amended response to request for production of documents (re David Marks materials)	\$888.00	0.20		\$177.60								
06/09/2020	Travis Close (TCC)	Review/analyze Ps dec of william blake peters iso Joint Stip re: further production of assessment data	\$888.00	0.30		\$266.40								
06/09/2020	Travis Close (TCC)	Review/analyze Dec of Robert Cocchia iso Joint Stip re: further production of assessment data + exhibits	\$888.00	0.20		\$177.60								
06/09/2020	Mark Johnson (MTJ)	call w/ COC BU re strategy for meeting and conferring w/ OC re supplemental responses to rogs 20, 21 re staffing formula and task times	\$888.00	0.20		\$177.60								
06/09/2020	Mark Johnson (MTJ)	review Ds rogs, Ps responses, supp responses and email for rogs 20 and 21 for com w/ BU re meet and confer.	\$888.00	0.30		\$266.40								
06/10/2020	Rachel Steyer (RLS)	reading emails from cocounsel re privilege logs	\$775.00	0.10		\$77.50	0.1	\$77.50						
06/10/2020	Mark Johnson (MTJ)	call w/ B Umpierre re issues related to proposed privilege log and production of documents and communications from putative class members	\$888.00	0.50		\$444.00								
06/10/2020	Mark Johnson (MTJ)	review and analysis of draft privilege log for documents and communications related to putative class members	\$888.00	0.20		\$177.60								
06/10/2020	Mark Johnson (MTJ)	review case law re production of documents / communications from putative class members	\$888.00	0.70		\$621.60								
06/10/2020	Mark Johnson (MTJ)	draft letter to M Maryott re discovery issues.	\$888.00	1.70		\$1,509.60								
06/10/2020	Guy Wallace (GBW)	review and analysis of letter from Maryott re current discovery issue	\$1,188.00	0.10		\$118.80								
06/10/2020	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20		\$237.60								
06/10/2020	Guy Wallace (GBW)	review and analysis of revised version of CJH Declaration re class certification and D's redlined version of CJH Declaration	\$1,188.00	0.60		\$712.80								

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				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
06/11/2020	Mark Johnson (MTJ)	research cases re making discovery responses conditioned on opponent's responses for ltr to OC	\$888.00	1.10							
06/11/2020	Mark Johnson (MTJ)	continue drafting ltr to OC re discovery, incorporate edits from COC re same; finalize and send	\$888.00	1.50							
06/11/2020	Mark Johnson (MTJ)	call w/ Rita Stiner re discovery responses for Stacia Stiner.	\$888.00	1.00							
06/11/2020	Mark Johnson (MTJ)	email exchanges w/ Healey, Umpierre and com w/ GBW re interrogatory strategy and number allowed per party.	\$888.00	0.20							
06/12/2020	Guy Wallace (GBW)	review and analysis of supplemental responses to D's Interrogatories 15-19, and CJH proposed edits re same	\$1,188.00	1.60							
06/12/2020	Guy Wallace (GBW)	com's with CJH and MTJ re preparation of revised version of CJH Declaration (.6)	\$1,188.00	0.60							
06/15/2020	Travis Close (TCC)	review/analyze order from court re: modification of scheduling date	\$888.00	0.10							
06/15/2020	Mark Johnson (MTJ)	com w/ GBW re Aegis settlement offer and position on injunctive relief	\$888.00	0.10							
06/15/2020	Mark Johnson (MTJ)	call w/ COC to strategize on discovery, class cert opp and reply,	\$888.00	0.30							
06/15/2020	Mark Johnson (MTJ)	com w/ Cocchia, Healey, Umpierre pending discovery disputes and strategy for addressing same following Cocchia departure	\$888.00	0.80							
06/15/2020	Mark Johnson (MTJ)	review prior correspondence and discovery for call w/ COC re pending discovery disputes	\$888.00	0.40							
06/15/2020	Guy Wallace (GBW)	com's with KAS; CJH; MT; MAY; BU; MTJ re discovery and class certification	\$1,188.00	0.30							
06/16/2020	Lourdes Castro (LEC)	searching in Bates stamped documents the number of reports re data extraction project	\$450.00	0.30				0.3	\$135.00		
06/16/2020	Guy Wallace (GBW)	com's with CJH; Marks; MTJ re schedule for expert depositions and class certification papers	\$1,188.00	0.40							
06/16/2020	Mark Johnson (MTJ)	review and edit / comment on Umpierre draft of demand letter to OC re ESI and outstanding discovery	\$888.00	0.20							
06/16/2020	Mark Johnson (MTJ)	email exchanges w/ CH and BU re same	\$888.00	0.20							
06/17/2020	Lourdes Castro (LEC)	searching and counting assessments within batches of pdfs assigned re data collection extraction	\$450.00	1.70				1.7	\$765.00		
06/17/2020	Lourdes Castro (LEC)	communication with Tracy Myrick re assessments re data extraction project	\$450.00	0.20				0.2	\$90.00		
06/17/2020	Mark Johnson (MTJ)	review and analyze D's portion of joint statement re production of assessment data.	\$888.00	0.60							
06/18/2020	Lourdes Castro (LEC)	working in the data extraction project	\$450.00	1.00				1	\$450.00		
06/18/2020	Mark Johnson (MTJ)	review and analysis of Damian declaration and exhibit and Maryott declaration iso Ds joint statement on resident assessment data.	\$888.00	0.30							
06/18/2020	Mark Johnson (MTJ)	coms w/ COC Healey, Umpierre, others re Ds proposed stipulation and supporting declaration for extension of expert depo deadline	\$888.00	0.10							
06/18/2020	Mark Johnson (MTJ)	draft response to OC re same	\$888.00	0.10							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
06/18/2020	Mark Johnson (MTJ)	review email from Umpierre re remaining production of expert disclosures	\$888.00	0.10		\$88.80									
06/19/2020	Guy Wallace (GBW)	com's with CJH; MTJ re schedule on expert depositions, class certification, proposed com's to Defendants re same	\$1,188.00	0.70		\$831.60									
06/19/2020	Guy Wallace (GBW)	legal research and analysis re case law re alleged variation in local policies or decisionmaking, and impact on commonality analysis	\$1,188.00	1.30		\$1,544.40									
06/21/2020	Guy Wallace (GBW)	com's with CJH; MTJ re schedule on discovery for class certification (including expert depositions) and deadlines for opposition and reply papers re same	\$1,188.00	0.40		\$475.20									
06/22/2020	Mark Johnson (MTJ)	analysis of D's position on assessment data	\$888.00	0.70		\$621.60									
06/22/2020	Mark Johnson (MTJ)	review prior communications, and discovery re same	\$888.00	0.30		\$266.40									
06/22/2020	Mark Johnson (MTJ)	begin working on draft of strategy for addressing same	\$888.00	0.30		\$266.40									
06/23/2020	Rachel Steyer (RLS)	reviewing and corresponding with co-counsel re status of opt in/out of declarations re arbitration, communications with declarants re arbitration status	775	1.50		\$1,162.50	1.5	\$1,162.50							
06/23/2020	Travis Close (TCC)	review/analyze Ps second amended app. to file under seal & supporting declarations	\$888.00	0.40		\$355.20									
06/23/2020	Guy Wallace (GBW)	tc with CJH; BU; MTJ re discovery issues, including D's draft of stipulation re Interrogatories Nos. 20 and 21 and P's responses thereto; D's response re production of assessment data in usable format and issues regarding possession or control of same and follow up meet and confer and discovery re same	\$1,188.00	0.90		\$1,069.20									
06/23/2020	Guy Wallace (GBW)	com's with CJH; GK; RLS re potential additional plaintiffs subject to D's arbitration agreement	\$1,188.00	0.30		\$356.40									
06/24/2020	Rachel Steyer (RLS)	conversation with GBW re identifying named plaintiff for class to challenge validity of arbitration agreement	775	0.50		\$387.50	0.5	\$387.50							
06/24/2020	Lourdes Castro (LEC)	working on the data extraction collection spreadsheet	450	1.10		\$495.00	1.1	\$495.00							
06/24/2020	Rachel Steyer (RLS)	communications with declarants to discuss possibility of class representation and responsibilities of named plaintiff; reviewing and corresponding with co-counsel and GBW re same	775	1.50		\$1,162.50	1.5	\$1,162.50							
06/24/2020	Mark Johnson (MTJ)	research cases re premature discovery of expert opinions and contention interrogatories seeking expert opinions, including won research and review of cases found by COC	\$888.00	1.80		\$1,598.40									
06/24/2020	Mark Johnson (MTJ)	revise, finalize and send ltr to OC re meeting and conferring re assessment data; previously undisclosed info and questions; including incorporation of edits from CH	\$888.00	0.50		\$444.00									
06/24/2020	Mark Johnson (MTJ)	further review of Ds motion to compel further responses to rogs 20, 21	\$888.00	0.60		\$532.80									
06/24/2020	Mark Johnson (MTJ)	draft e-memo to COC re analysis of same and strategy for responding.	\$888.00	0.20		\$177.60									
06/24/2020	Guy Wallace (GBW)	com's with RLS re potential additional named P's subject to D's arbitration agreement	\$1,188.00	0.50		\$594.00									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
06/25/2020	Rachel Steyer (RLS)	attempted call w/Lorelei Greenfield to discuss possibility of being class representative, left VM	775		0.10		\$77.50				
06/25/2020	Lourdes Castro (LEC)	communication with MTJ re data collection project	450		0.10		\$45.00				
06/25/2020	Mark Johnson (MTJ)	call w/ GBW and CH re depo availability for experts		\$888.00	0.30		\$266.40				
06/25/2020	Mark Johnson (MTJ)	com w/ OC re availability of experts for depo		\$888.00	0.10		\$88.80				
06/25/2020	Mark Johnson (MTJ)	emails w/ CH, Marks re expert availability for depositions		\$888.00	0.10		\$88.80				
06/25/2020	Mark Johnson (MTJ)	review outline / draft of opposition position for joint statement re mtn to compel further responses to rogs 20, 21, comment on same		\$888.00	0.50		\$444.00				
06/25/2020	Mark Johnson (MTJ)	work on section of joint statement re mtn to compel further response to rogs 20, 21, including drafting and research		\$888.00	1.50		\$1,332.00				
06/25/2020	Guy Wallace (GBW)	analysis of D's potential opposition arguments re class certification & preparation of response thereto		\$1,188.00	0.30		\$356.40				
06/25/2020	Guy Wallace (GBW)	com's with MTJ re same		\$1,188.00	0.20		\$237.60				
06/25/2020	Guy Wallace (GBW)	review and analysis of D's letter re potential motion for protective order		\$1,188.00	0.60		\$712.80				
06/25/2020	Guy Wallace (GBW)	com's with CJH; MTJ re same and schedule re depositions of Schroyer; Kennedy; Flores		\$1,188.00	0.20		\$237.60				
06/26/2020	Lourdes Castro (LEC)	working in the data collection project	450		2.20		\$990.00	2.2	\$990.00		
06/26/2020	Lourdes Castro (LEC)	WORKING IN THE DATA EXTRACTION PROJECT	450		3.80		\$1,710.00	3.8	\$1,710.00		
06/26/2020	Lourdes Castro (LEC)	communication with MTJ re data collection project	450		0.30		\$135.00	0.3	\$135.00		
06/26/2020	Rachel Steyer (RLS)	conversations with declarants re possibility of serving as named plaintiff/class representative	775		0.30		\$232.50	0.3	\$232.50		
06/26/2020	Mark Johnson (MTJ)	work on section of joint statement re rogs 20, 201		\$888.00	3.50		\$3,108.00				
06/29/2020	Lourdes Castro (LEC)	working on the extraction data collection project	450		3.00		\$1,350.00	3	\$1,350.00		
06/29/2020	Lourdes Castro (LEC)	Working in the data collection/straction project	450		0.30		\$135.00	0.3	\$135.00		
06/29/2020	Lourdes Castro (LEC)	calendar conference call re: meet and confer w/ OC re protective order and other issues	450		0.10		\$45.00	0.1	\$45.00		
06/29/2020	Rachel Steyer (RLS)	communications with declarants about possibility of being class rep/name plaintiff; communications with GBW	775		1.10		\$852.50	1.1	\$852.50		
06/29/2020	Lourdes Castro (LEC)	working in the data extraction/collection project	450		3.20		\$1,440.00	3.2	\$1,440.00		
06/29/2020	Guy Wallace (GBW)	review and analysis of letter from Maryott re D's proposed motion for protective order re discovery		\$1,188.00	0.40		\$475.20				
06/29/2020	Guy Wallace (GBW)	com's with CJH; BU; MTJ re same		\$1,188.00	0.30		\$356.40				
06/29/2020	Guy Wallace (GBW)	com's with CJH; BU; MTJ re motion to compel production of assessment data in usable format		\$1,188.00	0.30		\$356.40				
06/30/2020	Travis Close (TCC)	review/analyze draft joint stip of points and authorities re: def's motion to compel further responses to ROGs		\$888.00	0.80		\$710.40				
06/30/2020	Guy Wallace (GBW)	legal research and analysis re D's proposed motion for protective order re P's discovery during class certification motion		\$1,188.00	0.90		\$1,069.20				
06/30/2020	Guy Wallace (GBW)	preparation for meet and confer with D's re motion for protective order re discovery; class certification schedule; P's pending discovery; expert depositions of Schroyer; Flores		\$1,188.00	0.60		\$712.80				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
06/30/2020	Guy Wallace (GBW)	tc with Maryott; Gorman; BU; MTJ re D's proposed motion for protective order; class certification schedule; depositions of Schroyer and Flores and D.'s discovery re same; D's ongoing failure to produce assessment data and other documents	\$1,188.00	0.90		\$1,069.20									
06/30/2020	Guy Wallace (GBW)	com's with CJH; MTJ re results of meet and confer with Maryott; Gorman	\$1,188.00	0.40		\$475.20									
06/30/2020	Mark Johnson (MTJ)	meet and confer call w/ OC re ESI, expert subpoena, proposed mtn for protective order	\$888.00	1.90		\$1,687.20									
06/30/2020	Mark Johnson (MTJ)	prep for meet and confer re proposed protective order, expert discovery, including review meet and confer correspondence, cases cited, subpoena and objections.	\$888.00	0.60		\$532.80									
07/01/2020	Rachel Steyer (RLS)	discussions with co-counsel concerning strategies re obtaining new class representatives, depo prep. leave to amend motion	775	1.10		\$852.50	1.1	\$852.50							
07/01/2020	Rachel Steyer (RLS)	discussion w/Steve Brown re efforts to find residency agreement to determine arbitration status	775	0.30		\$232.50	0.3	\$232.50							
07/01/2020	Travis Close (TCC)	legal research re: how to add a plaintiff under rule 15(a)	\$888.00	0.40		\$355.20									
07/01/2020	Travis Close (TCC)	call with MTJ re: leave to amend & add plaintiff after scheduling order timeline has passed	\$888.00	0.20		\$177.60									
07/01/2020	Travis Close (TCC)	legal research re: cases where plaintiffs attempted to amend scheduling orders after deadlines had passed	\$888.00	1.40		\$1,243.20									
07/01/2020	Travis Close (TCC)	legal research re: cases where parties attempted to add new plaintiffs after scheduling order deadline	\$888.00	0.70		\$621.60									
07/01/2020	Mark Johnson (MTJ)	call w/ team (CH, MY, BU, KS, BF) re strategy for adding plaintiffs and class reps, declarant depositions, requesting declarant files	\$888.00	1.00		\$888.00			1	888					
07/01/2020	Mark Johnson (MTJ)	call w/ BU, CH re follow up on objections to subpoenas for expert docs; responses to D's meet and confer questions	\$888.00	0.30		\$266.40									
07/01/2020	Mark Johnson (MTJ)	call w/ CH, BU re strategy for obtaining assessment data, subpoena of vendor, depo of D's declarant	\$888.00	0.30		\$266.40									
07/01/2020	Mark Johnson (MTJ)	call w/ TCC re research on showing necessary to amend complaint to add plaintiff / class rep.	\$888.00	0.20		\$177.60									
07/01/2020	Mark Johnson (MTJ)	call w/ GBW re expected argument in opp to class cert and response to same; discovery strategy, D's proposed mtn for protective order	\$888.00	0.30		\$266.40									
7/1/2020	Mark Johnson (MTJ)	review proposed correspondence w/ OC re expert subpoenas and objections	\$888.00	0.10		\$88.80									
07/01/2020	Guy Wallace (GBW)	review and analysis of draft response re D's MTC absent class member information	\$1,188.00	0.50		\$594.00									
07/01/2020	Guy Wallace (GBW)	com's with CJH; MTJ; RLS re further discovery; discovery disputes with Defendants and their proposed motion for a protective order; potential new plaintiffs subject to Sunrise's arbitration agreement	\$1,188.00	0.80		\$950.40									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
07/02/2020	Rachel Steyer (RLS)	conversation with Steve Brown detailing responsibilities of class representative	775		0.50		\$387.50				
07/02/2020	Guy Wallace (GBW)	tc with MTJ re proposal to add P.'s to 2AC		\$1,188.00	0.30		\$356.40				
07/02/2020	Travis Close (TCC)	review final version of joint stip on Ds mtn to compel further responses to ROGs		\$888.00	0.20		\$177.60				
07/06/2020	Mark Johnson (MTJ)	review draft supplemental brief iso mtn to compel assessment data in electronic form		\$888.00	0.70		\$621.60				
07/06/2020	Mark Johnson (MTJ)	draft revisions to same.		\$888.00	0.40		\$355.20				
07/06/2020	Mark Johnson (MTJ)	review draft of joint statement to compel production of putative class member documents and commiunications		\$888.00	0.50		\$444.00				
07/06/2020	Mark Johnson (MTJ)	emails re same		\$888.00	0.20		\$177.60				
07/07/2020	Travis Close (TCC)	legal research into standard for "good cause" under FRPC rule 16		\$888.00	0.90		\$799.20				
07/07/2020	Travis Close (TCC)	Research cases where plaintiff sought amendment of scheduling order after deadline had passed		\$888.00	1.40		\$1,243.20				
07/07/2020	Travis Close (TCC)	Research cases where plaintiff sought amendment of scheduling order to add new plaintiffs after deadline had passed and court granted amendment		\$888.00	1.10		\$976.80				
07/07/2020	Mark Johnson (MTJ)	review stip from oc re modification of schedule		\$888.00	0.40		\$355.20				
07/07/2020	Mark Johnson (MTJ)	Com w/ COC re issues w/ same		\$888.00	0.20		\$177.60				
07/07/2020	Guy Wallace (GBW)	revise and edit draft of stipulation re D's MTC re documents from putative class members		\$1,188.00	0.20		\$237.60				
07/07/2020	Guy Wallace (GBW)	com's with CJH; BU; MTJ re discovery issues		\$1,188.00	0.20		\$237.60				
07/08/2020	Mark Johnson (MTJ)	review and draft proposed revisions to draft declaration of M Maryott iso stipulation for extension of briefing schedule and enlargement of page limits.		\$888.00	1.60		\$1,420.80				
07/08/2020	Mark Johnson (MTJ)	email to OC A Allyn explaining revisions to draft Maryott declaration in support of stip for modification of briefing schedule and enlargement of page limit.		\$888.00	0.30		\$266.40				
07/08/2020	Travis Close (TCC)	research 9th circuit cases where plaintiff sought modification of scheduling order to add new plaintiffs after deadline had passed		\$888.00	1.50		\$1,332.00				
07/08/2020	Travis Close (TCC)	Begin drafting memo re: viability of amending complaint after deadline set in scheduling order		\$888.00	1.60		\$1,420.80				
07/08/2020	Guy Wallace (GBW)	review and analysis of letter from Maryott re subpoena of Schroyer materials		\$1,188.00	0.20		\$237.60				
07/08/2020	Guy Wallace (GBW)	com's with MTJ re response thereto		\$1,188.00	0.20		\$237.60				
07/08/2020	Mark Johnson (MTJ)	draft response to ltr from OC re Schroyer subpoena		\$888.00	2.30		\$2,042.40				
07/08/2020	Mark Johnson (MTJ)	com w/ GBW re strategy for responding to ltr from OC re ezxpert disclosures and subpoena, motions to compel communications with Steve Brown answering belated questions about possibility of being class representative		\$888.00	0.30		\$266.40				
07/09/2020	Rachel Steyer (RLS)	continue drafting research memo re: viability of amending pleadings after scheduling order deadline	775		0.20		\$155.00	0.2	\$155.00		
07/09/2020	Travis Close (TCC)	continue drafting scheduling order research memo		\$888.00	1.70		\$1,509.60				
07/09/2020	Travis Close (TCC)			\$888.00	1.20		\$1,065.60				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs		Hrs		Hrs		Hrs	
07/09/2020	Travis Close (TCC)	Review Ps motion to compel further answers to interrogatories	\$888.00	0.30		\$266.40								
07/09/2020	Travis Close (TCC)	continue drafting scheduling order research memo review and offer revisions / comments to COC re revised version of ltr responding to D's demand for expert materials in connection with expert subpoena.	\$888.00	1.30		\$1,154.40								
07/09/2020	Mark Johnson (MTJ)	review and comment on supplemental memo iso opposition to mtn to compel further answers to rogs 20 and 21	\$888.00	0.40		\$355.20								
07/09/2020	Mark Johnson (MTJ)	review Ds supp memo iso mtn to compel frurther responses to rogs 20 and 21.	\$888.00	0.30		\$266.40								
07/09/2020	Mark Johnson (MTJ)	collect, organize and quick review of pleadings om mtng to comple rogs 20-21, mtc putatative class member docs and mtc assessment data	\$888.00	0.80		\$710.40								
07/09/2020	Mark Johnson (MTJ)	com w/ LEC re preparation of hearing binders for same, calendaring hearings, etc.	\$888.00	0.20		\$177.60								
07/09/2020	Mark Johnson (MTJ)	email discussion w/ COC Healey and Umpierre re proposed order on MTC assessment database	\$888.00	0.20		\$177.60								
07/10/2020	Travis Close (TCC)	analyze/summarize cases Gould v. Motel 6 , Bohn v. Pharmavite for scheduling order amendment memo	\$888.00	0.70		\$621.60								
07/10/2020	Travis Close (TCC)	analyze/summarize cases Dibb v. AllianceOne, Taylor v. Shippers Transp. for scheduling order amendment memo	\$888.00	1.10		\$976.80								
07/10/2020	Travis Close (TCC)	continue drafting scheduling order amendment memo	\$888.00	1.40		\$1,243.20								
07/10/2020	Travis Close (TCC)	review/analyze defendants' letter concerning the subpoena to patrick kennedy to produce documents	\$888.00	0.10		\$88.80								
07/10/2020	Travis Close (TCC)	review/analyze defendants' responses and objections to Ps sixth set of requests for production of documents	\$888.00	0.20		\$177.60								
07/10/2020	Travis Close (TCC)	continue researching cases where court allowed plaintiffs in class action to amend schedung order & pleadings	\$888.00	1.10		\$976.80								
07/10/2020	Guy Wallace (GBW)	com's with CJH; BU; MTJ re depositions of Schroyer; Kennedy	\$1,188.00	0.40		\$475.20								
07/10/2020	Mark Johnson (MTJ)	draft declaration iso mtn to compel assessment and service plan data	\$888.00	2.40		\$2,131.20								
07/10/2020	Mark Johnson (MTJ)	review motion, emails and prior meet and confer correspondence for same	\$888.00	1.00		\$888.00								
07/13/2020	Rachel Steyer (RLS)	email communications with MTJ regarding availability of class member for deposition	775	0.10		\$77.50	0.1	\$77.50						
07/13/2020	Rachel Steyer (RLS)	phone call w/Tanya Wicht to confirm availability for deposition	775	0.10		\$77.50	0.1	\$77.50						
07/13/2020	Rachel Steyer (RLS)	correspondence with cocounsel re declarant availability	775	0.10		\$77.50	0.1	\$77.50						
07/13/2020	Lourdes Castro (LEC)	printing documents for binders	450	1.20		\$540.00	1.2	\$540.00						
07/13/2020	Lourdes Castro (LEC)	communication with GBW re tomorrow;s depo	450	0.10		\$45.00	0.1	\$45.00						
07/13/2020	Mark Johnson (MTJ)	review portions of Schroyer depo	\$888.00	0.60		\$532.80								
07/13/2020	Mark Johnson (MTJ)	meeting w/COC CH, GBW, Megan, Brian, Stephanie, Foss, D Marks. re outstanding discvoery issues, case schedule, planning and assigment of tasks.	\$888.00	1.00		\$888.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
07/13/2020	Mark Johnson (MTJ)	call w/ GBW re Kennedy depo, docs produced for same, including spreadsheet.	\$888.00	0.10		\$88.80								
07/13/2020	Travis Close (TCC)	finish drafting memo re: modifying scheduling order to amend pleadings after deadline	\$888.00	1.50		\$1,332.00								
07/13/2020	Mark Johnson (MTJ)	legal research on representation of absent class members for purpose of deposition and privilege ramifications and scope	\$888.00	3.30		\$2,930.40								
07/13/2020	Mark Johnson (MTJ)	email to OC re results of research on representation of absent class members at depo	\$888.00	0.20		\$177.60								
07/13/2020	Mark Johnson (MTJ)	review TCC research memo re amending complaint to add class members	\$888.00	0.20		\$177.60								
07/13/2020	Mark Johnson (MTJ)	coms w/ TCC and co-counsel re same	\$888.00	0.20		\$177.60								
07/13/2020	Mark Johnson (MTJ)	coms w/ Rachel Steyer re declaration depo scheduling and communication with deponents re same	\$888.00	0.20		\$177.60								
07/13/2020	Mark Johnson (MTJ)	reviwe and provide feedback (x2) on draft ltr to OC re declarant depositions and obtaining files	\$888.00	0.20		\$177.60								
07/13/2020	Mark Johnson (MTJ)	review outline from COC CH on strategy for amending pleadings to add class members based on TCC research and timing related to same	\$888.00	0.20		\$177.60								
07/13/2020	Guy Wallace (GBW)	com's with Kennedy; CJH re deposition preparation	\$1,188.00	1.10		\$1,306.80								
07/13/2020	Guy Wallace (GBW)	preparation to defend deposition of Kennedy	\$1,188.00	1.60		\$1,900.80								
07/13/2020	Guy Wallace (GBW)	review and analysis of Declaration re class certification; D's subpoena re documents; P's responses thereto	\$1,188.00	1.00		\$1,188.00								
07/13/2020	Guy Wallace (GBW)	tc with CJH; BU; MAY; RF; MTJ re discovery tasks, disputes with Defendants re same and preparation for class certification reply	\$1,188.00	0.80		\$950.40								
07/14/2020	Lourdes Castro (LEC)	finalizing hearing binders for MTJ	450	3.30		\$1,485.00	3.3	\$1,485.00						
07/14/2020	Lourdes Castro (LEC)	Assisting GBW getting things ready for deposition	450	0.10		\$45.00	0.1	\$45.00						
07/14/2020	Mark Johnson (MTJ)	review and analyze and annotate D's responses and objections to 6th set of document requests for meet and confer letter	\$888.00	1.80		\$1,598.40								
07/14/2020	Mark Johnson (MTJ)	call and emails w/ COC BU re analysis of responses to 6th set of document requests and strategy for meet and confer ltr	\$888.00	0.20		\$177.60								
07/14/2020	Mark Johnson (MTJ)	review and analysis of BU outline / notes re strategy for meet and confer letter and procedural history.	\$888.00	0.20		\$177.60								
07/14/2020	Mark Johnson (MTJ)	work on demand/meet and confer letter to OC e responses and objections to 6th set of document requests.	\$888.00	5.70		\$5,061.60								
07/14/2020	Mark Johnson (MTJ)	email exchanges w/ CH and SW attorneys re potential discovery special masters and strategy for meet and confer session re same w/ OC	\$888.00	0.20		\$177.60								
07/14/2020	Travis Close (TCC)	review CH's (co-counsel) analysis on issue of amending pleadings after SO deadline	\$888.00	0.20		\$177.60								
07/14/2020	Travis Close (TCC)	legal research re: cases where arbitration adequacy was reason for amending scheduling order	\$888.00	1.40		\$1,243.20								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
07/14/2020	Travis Close (TCC)	legal research re: cases where courts found that arbitration differences did not defeat typicality	\$888.00		1.60						
07/14/2020	Guy Wallace (GBW)	prepare for and defend deposition of Dr. Kennedy	\$1,188.00		9.20		\$10,929.60				
07/14/2020	Guy Wallace (GBW)	com's with Dr. Kennedy; CJH re deposition testimony	\$1,188.00		0.40		\$475.20				
07/15/2020	Lourdes Castro (LEC)	saving and processing depo transcripts for Patrick Kennedy	450		0.20		\$90.00	0.2	\$90.00		
07/15/2020	Travis Close (TCC)	review/analyze additional case authority by CH (co-counsel) re: timing issue for amending scheduling order	\$888.00		0.50		\$444.00				
07/15/2020	Travis Close (TCC)	legal research into prisoner claims under environmental statutes	\$888.00		1.10		\$976.80				
07/15/2020	Guy Wallace (GBW)	com's with CJH; BU; MTJ re P's and D's proposals re special master for discovery disputes and meet and confer re same	\$1,188.00		0.60		\$712.80				
07/15/2020	Mark Johnson (MTJ)	calls to Judge Brazil's assistant	\$888.00		0.10		\$88.80				
07/15/2020	Mark Johnson (MTJ)	email exchange w/ Sandra Chan at JAMS re availability of judge Brazil for discovery master assignment.	\$888.00		0.10		\$88.80				
07/15/2020	Guy Wallace (GBW)	com's with CJH; MTJ re Kennedy depo and D's examination of same	\$1,188.00		0.40		\$475.20				
07/15/2020	Mark Johnson (MTJ)	com w/ GBW re position on discovery special master	\$888.00		0.20		\$177.60				
07/15/2020	Mark Johnson (MTJ)	call w/ COC GBW, BU, CH to discuss position on appointment of discovery referee and recommendations for same	\$888.00		0.40		\$355.20				
07/15/2020	Mark Johnson (MTJ)	meet and confer w/ OC per court order re potential appointment of discovery special master.	\$888.00		0.50		\$444.00				
07/15/2020	Mark Johnson (MTJ)	prep for call w/ OC re discovery special master	\$888.00		0.30		\$266.40				
07/15/2020	Mark Johnson (MTJ)	review and edit draft statement re discovery special master	\$888.00		1.20		\$1,065.60				
07/15/2020	Mark Johnson (MTJ)	coms w/ COC Healey and Umpierre re same	\$888.00		0.20		\$177.60				
07/15/2020	Mark Johnson (MTJ)	draft email summary of meet and confer session w/ OC re discovery special master for file an COC	\$888.00		0.20		\$177.60				
07/15/2020	Mark Johnson (MTJ)	review ltr from OC re request for declarant resident files	\$888.00		0.10		\$88.80				
07/15/2020	Mark Johnson (MTJ)	coms w/ COC and Rachel re obtaining consent from class members for same.	\$888.00		0.10		\$88.80				
07/15/2020	Mark Johnson (MTJ)	continue working on demand / meet and confer ltr re 6th set of document request.	\$888.00		3.00		\$2,664.00				
07/16/2020	Travis Close (TCC)	review/analyze Ds submitted papers iso motion for ex parte relief	\$888.00		0.50		\$444.00				
07/16/2020	Travis Close (TCC)	Review/analyze Ps notice of appointment of discovery master	\$888.00		0.30		\$266.40				
07/16/2020	Guy Wallace (GBW)	com's with CJH; MTJ re potential candidates for special master for discovery; D's ex parte motion re schedule on class certification	\$1,188.00		0.40		\$475.20				
07/16/2020	Mark Johnson (MTJ)	draft response to D's ex parte application to extend deadlines for class cert opposition and enlarge page limit	\$888.00		4.00		\$3,552.00				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
07/16/2020	Mark Johnson (MTJ)	call from OC re submission to court on discovery special master, D's intent to file ex parte for application to extend deadlines	\$888.00		0.30						
07/17/2020	Lourdes Castro (LEC)	finalizing and filing Response to Ds Ex-parte application and decl of MTJ	450		0.40		\$180.00				
07/17/2020	Rachel Steyer (RLS)	communications with cocounsel related to arbitration provision of Ks	775		0.10		\$77.50				
07/17/2020	Travis Close (TCC)	review Ds answers & objections to Ps special interrogatories, set 2	\$888.00		0.20						
07/17/2020	Travis Close (TCC)	review/analyze Ps response to Ds motion for ex parte order	\$888.00		0.40						
07/17/2020	Guy Wallace (GBW)	revise and edit opposition to D's ex parte application re schedule	\$1,188.00		0.50						
07/17/2020	Guy Wallace (GBW)	com's with CJH; MTJ re same	\$1,188.00		0.20						
07/17/2020	Mark Johnson (MTJ)	draft declaration iso response to D's ex parte application for extension of time and enlargement of page limits, integrate cites into brief	\$888.00		3.40		\$3,019.20				
07/17/2020	Mark Johnson (MTJ)	complete draft of pre-filing conference letter re responses to 6th set of document requests.	\$888.00		2.60		\$2,308.80				
07/20/2020	Mark Johnson (MTJ)	review and analyze order court denying motion to compel further responses to rogs 20, 21.	\$888.00		0.40		\$355.20				
07/20/2020	Mark Johnson (MTJ)	strategy call w/ CH, Jim Thorton, Blake Peters, David Marks re meeting and conferring re data motion	\$888.00		0.40		\$355.20				
07/20/2020	Travis Close (TCC)	Review/analyze judge' order re: motion to compel ESI data	\$888.00		0.20		\$177.60				
07/20/2020	Travis Close (TCC)	Review/analyze judge's order denying Def's motion to compel further responses to ROGs 20 and 21	\$888.00		0.20		\$177.60				
07/20/2020	Mark Johnson (MTJ)	draft ltr to judicate West assistant re discovery special master appointment a locate/prepare attachments - order, service list, amended complaint	\$888.00		0.90		\$799.20				
07/20/2020	Mark Johnson (MTJ)	draft ltr to OC re questions for meet and confer with experts re assessment data; including list of questions for same	\$888.00		1.70		\$1,509.60				
07/20/2020	Mark Johnson (MTJ)	review and analyze court order from Judge Early re assessment data motion; meet and confer order	\$888.00		0.40		\$355.20				
07/20/2020	Mark Johnson (MTJ)	review court order appointing discovery special master	\$888.00		0.30		\$266.40				
07/20/2020	Mark Johnson (MTJ)	revise and finalize ltr to OC re responses to 6th set of document requests and arbitration-related interrogatories, incorporating edits from COC and waiver argument based on boilerplate objections.	\$888.00		1.00		\$888.00				
07/20/2020	Mark Johnson (MTJ)	edits to ltr re assesment data motion meet and confer	\$888.00		0.10		\$88.80				
07/20/2020	Mark Johnson (MTJ)	email coc re same	\$888.00		0.10		\$88.80				
07/20/2020	Mark Johnson (MTJ)	coms w/ GBW re 3 orders issued, data motion meet and confer and special master appointment.	\$888.00		0.30		\$266.40				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
07/21/2020	Lourdes Castro (LEC)	communication with GBW re emailing draft notice of name change	450		0.10		\$45.00				
07/21/2020	Lourdes Castro (LEC)	finalizing and filing notice of name change	450		0.20		\$90.00				
07/21/2020	Lourdes Castro (LEC)	updating draft re notice of change name	450		0.10		\$45.00	0.1	\$45.00		
07/21/2020	Travis Close (TCC)	review/analyze Ps draft meet and confer letter re: sunrises' deficient responses to 6th set of RFPs		\$888.00	0.40		\$355.20				
07/21/2020	Travis Close (TCC)	review & analyze Ps draft letter for meeting & conferring on production of assessment data		\$888.00	0.20		\$177.60				
07/21/2020	Guy Wallace (GBW)	review and analysis of discovery rulings from MJ Early re D's MTC re interrogatory answers; P's MTC re data; J. Staton's referral of discovery disputes to Judge Guilford as a special master		\$1,188.00	0.70		\$831.60				
07/21/2020	Guy Wallace (GBW)	com's with CJH; MTJ; BU re same		\$1,188.00	0.60		\$712.80				
07/21/2020	Guy Wallace (GBW)	review and analysis of D's proposed changes to stipulation and order on schedule re class certification		\$1,188.00	0.50		\$594.00				
07/21/2020	Guy Wallace (GBW)	com's with Allen; CJH; MTJ; BU re same		\$1,188.00	0.20		\$237.60				
07/21/2020	Guy Wallace (GBW)	legal research and analysis re recent Ninth Circuit decisions re predominance; commonality; typicality and inclusion of class members who may lack injury		\$1,188.00	1.20		\$1,425.60				
07/21/2020	Mark Johnson (MTJ)	call w/ Blake Peters and counsel Healey, Thorton, Marks, Umpierre re planning for court ordered meet and confer		\$888.00	0.40		\$355.20				
07/21/2020	Mark Johnson (MTJ)	reconvnced call on Logmein without Healey re same and development of revised list of topics / questions for Damian.		\$888.00	0.80		\$710.40				
07/21/2020	Mark Johnson (MTJ)	draft revised list of questions for Marty Damian (sunrise declarant), integrating prior list with new questions from Peters/Thorton and drafting additional questions		\$888.00	1.70		\$1,509.60				
07/21/2020	Mark Johnson (MTJ)	integrate edits from COC CH and BU		\$888.00	0.40		\$355.20				
07/21/2020	Mark Johnson (MTJ)	revise and send ltr to OC re court ordered meet and confer on data motion and questions for Declarant Damian		\$888.00	0.10		\$88.80				
07/21/2020	Mark Johnson (MTJ)	com w/ AP expert rep re availability and cost of expert to participate in court-ordered meet and confer re data motion.		\$888.00	0.20		\$177.60				
07/21/2020	Mark Johnson (MTJ)	multiple email exchanges w/ OC AA re proproposed stip on extension of time for briefing class cert opp and additional pages including revisions to same and questions re language and intent, declarant depos and resident file production		\$888.00	0.60		\$532.80				
07/21/2020	Mark Johnson (MTJ)	emails w/ COC GBW, BU, CH re strategy on stip for extending briefing schedule on class cert, dates for declarant depos and resident file production, date for filing and briefing motion to amend pleadings.		\$888.00	0.30		\$266.40				
07/21/2020	Mark Johnson (MTJ)	review proposed edits to stip on extension of time to brief class cert opp, etc.		\$888.00	0.10		\$88.80				
07/21/2020	Mark Johnson (MTJ)	email to COC re same		\$888.00	0.10		\$88.80				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions						
				Worked			General	CC Confs	Falkenberg	Travel			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
07/22/2020	Rachel Steyer (RLS)	double checking email thread to see if there are blank docs to obtain disclosure from declarant	775		0.10		\$77.50	0.1	\$77.50				
07/22/2020	Lourdes Castro (LEC)	calendar call for MTJ re Assessment data meet and confer	450		0.10		\$45.00	0.1	\$45.00				
07/22/2020	Rachel Steyer (RLS)	email question related to which cocounsel to designate as authorized agent to receive signed release for declarant	775		0.20		\$155.00	0.2	\$155.00				
07/22/2020	Rachel Steyer (RLS)	email to class member w/signed release forms (issues w/attachments)	775		0.30		\$232.50	0.3	\$232.50				
07/22/2020	Lourdes Castro (LEC)	proceesing via file linker proceeding transcripts and saving them in folder	450		0.20		\$90.00	0.2	\$90.00				
07/22/2020	Mark Johnson (MTJ)	call w/ CJH re meet and confer on data motion and impact of proposal on supplemental brief.			\$888.00	0.30	\$266.40						
07/22/2020	Mark Johnson (MTJ)	call w/ Blake Peters re prep for tech call w/ Damian and counsel for Sunrise, clarifcation of questions to be asked, etc.			\$888.00	0.30	\$266.40						
07/22/2020	Mark Johnson (MTJ)	set up group text and arrangment for communication w/ COC and Peters off line during meet and confer tech call			\$888.00	0.40	\$355.20						
07/22/2020	Mark Johnson (MTJ)	coms w/ OC Ashley Allyn and COC Healey (separate) re additional questions before committing to stipulated schedule and sign off on stip.			\$888.00	0.30	\$266.40						
07/22/2020	Mark Johnson (MTJ)	court ordered meet and confer w/ OC, Damian, Jane Warwick from PCC and COC BU re production of assessment data			\$888.00	1.30	\$1,154.40						
07/22/2020	Mark Johnson (MTJ)	call w/ CJH, BU to follow up and brief Chris on tech meet and confer re data motion and plan strategy for supplemental brief re same			\$888.00	0.60	\$532.80						
07/22/2020	Mark Johnson (MTJ)	court ordered meet and confer re assessment data motion w/ Ashley Allyn, Joe Gorman, BU re resolution of dispute on assessment data production			\$888.00	0.80	\$710.40						
07/22/2020	Mark Johnson (MTJ)	draft email memo to COC re results of court ordered meet and confer concerning assessment and service plan data and motion to compel same.			\$888.00	0.50	\$444.00						
07/22/2020	Mark Johnson (MTJ)	revisions to draft declaration iso assessment data motion based on meet and confer w/ technical reps and follow up meet and confer w/ counsel			\$888.00	1.00	\$888.00						
07/22/2020	Guy Wallace (GBW)	review and analysis of depo testimony of Kennedy and D's exam of same			\$1,188.00	1.10	\$1,306.80						
07/23/2020	Rachel Steyer (RLS)	leaving VM w/Tanya Wicht re filling out authorized release forms	775		0.10		\$77.50	0.1	\$77.50				
07/23/2020	Lourdes Castro (LEC)	downloading deposition transcript and proceeding transcripts	450		0.30		\$135.00	0.3	\$135.00				
07/23/2020	Lourdes Castro (LEC)	saving deposition transcript and proceeding transcripts to the appropriate folder	450		0.10		\$45.00	0.1	\$45.00				
07/23/2020	Lourdes Castro (LEC)	processing via file linker deposition transcript and proceeding transcript	450		0.10		\$45.00	0.1	\$45.00				

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				Worked			General	CC Confs	Falkenberg	Travel		
							Hrs	Fees	Hrs	Fees	Hrs	Fees
07/23/2020	Rachel Steyer (RLS)	updated correspondence w/declarant re receiving signed released forms	775		0.10	\$77.50		0.1		\$77.50		
07/23/2020	Rachel Steyer (RLS)	updating co-counsel re receipt of declarant's authorized release docs	775		0.10	\$77.50		0.1		\$77.50		
07/23/2020	Rachel Steyer (RLS)	request for dates related to deposition	775		0.10	\$77.50		0.1		\$77.50		
07/23/2020	Guy Wallace (GBW)	review and analysis of deposition of Dr. Kennedy and D's examination of same		\$1,188.00	3.80	\$4,514.40						
07/23/2020	Travis Close (TCC)	Review/analyze Ps supplemental memo re: motion to compel & BMU declaration in support of		\$888.00	0.20	\$177.60						
07/23/2020	Guy Wallace (GBW)	preparation of list of questions and comments re D's deposition of Dr. Kennedy for use in preparation for deposition of Dr. Flores		\$1,188.00	1.50	\$1,782.00						
07/23/2020	Guy Wallace (GBW)	com's with DM; CJH re same		\$1,188.00	0.30	\$356.40						
07/23/2020	Mark Johnson (MTJ)	call w/ COC Healey re draft response to OC concerning compromise proposal on production of assessment data.		\$888.00	0.20	\$177.60						
07/23/2020	Mark Johnson (MTJ)	work on supplemental brief iso motion to compel assessment data, including review and comment on revise version		\$888.00	1.50	\$1,332.00						
07/23/2020	Mark Johnson (MTJ)	review, edit and provide input on supplemental brief in opposition to motiom to compel declarant-related documents		\$888.00	0.30	\$266.40						
07/24/2020	Rachel Steyer (RLS)	transmitting signed release forms to cocounsel, indicate declarant's availability for depositions	775		0.10	\$77.50		0.1		\$77.50		
07/24/2020	Rachel Steyer (RLS)	responding to declarant's email acknowledging receipt	775		0.10	\$77.50		0.1		\$77.50		
07/24/2020	Lourdes Castro (LEC)	adding call in CM re – call w/ COC re depo prep for declarants.	450		0.10	\$45.00		0.1		\$45.00		
07/24/2020	Mark Johnson (MTJ)	com w CH re statements in D's supp memo in opposition to MTC assessment data		\$888.00	0.60	\$532.80						
07/24/2020	Guy Wallace (GBW)	com's with Marks; CJH re deposition of Dr. Flores		\$1,188.00	1.20	\$1,425.60						
07/27/2020	Rachel Steyer (RLS)	confirming with declarant availability re proposed deposition dates	775		0.10	\$77.50		0.1		\$77.50		
07/27/2020	Travis Close (TCC)	Analyze emails/docs from MTJ re: beginning new assignment: motion to amend		\$888.00	0.40	\$355.20						
07/27/2020	Travis Close (TCC)	Begin reviewing materials/cases distributed by team for motion to amend pleadings		\$888.00	1.40	\$1,243.20						
07/27/2020	Mark Johnson (MTJ)	call w/ GBW re strategy and arguments available on motion to amend pleadings to add plaintiffs		\$888.00	0.20	\$177.60						
07/27/2020	Mark Johnson (MTJ)	call w/ COC re prep for defending absent class members		\$888.00	0.60	\$532.80						
07/27/2020	Mark Johnson (MTJ)	calls and emails w/ COC re motion to amend pleading to add plaintiffs, authority for same, timing for draft		\$888.00	0.30	\$266.40						
07/27/2020	Mark Johnson (MTJ)	call to discovery master's assistant re status		\$888.00	0.10	\$88.80						
07/27/2020	Mark Johnson (MTJ)	email exchanges w/ CH, BU re info to provide to Judge Guiloford's asst.		\$888.00	0.10	\$88.80						
07/27/2020	Mark Johnson (MTJ)	email to asst. re Judge Early's decision vacating hearings on pending motions.		\$888.00	0.10	\$88.80						

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				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees		
							Hrs		Hrs		Hrs		Hrs		Hrs	
07/27/2020	Mark Johnson (MTJ)	review draft outline for prep of absent class members for depositions.	\$888.00		0.50	\$444.00										
07/27/2020	Guy Wallace (GBW)	com's with MTJ	\$1,188.00		0.40	\$475.20										
07/27/2020	Guy Wallace (GBW)	TCC re potential motion for leave to amend to add new plaintiffs and proposed class representatives and issue of good cause	\$1,188.00		0.20	\$237.60										
07/28/2020	Rachel Steyer (RLS)	reviewing deposition outline prepared by cocounsel in advance of meeting tomorrow	775		0.20	\$155.00		0.2	\$155.00							
07/28/2020	Ryan Bonner (RAB)	Uploading productions SUN0096964 - SUN0100631 on shared ftp site and Relativity	900		0.40	\$360.00		0.4	\$360.00							
07/28/2020	Travis Close (TCC)	continue draft motion to modify scheduling order (outline)	\$888.00		1.30	\$1,154.40										
07/28/2020	Travis Close (TCC)	continue draft motion to modify scheduling order (outline, argument c(4))	\$888.00		1.70	\$1,509.60										
07/28/2020	Guy Wallace (GBW)	com's with MTJ re proposed motion for leave to amend to add new Plaintiffs; potential classwide challenge to validity of D.'s arbitration agreement	\$1,188.00		0.70	\$831.60										
07/28/2020	Guy Wallace (GBW)	review and analysis of Order re schedule on class certification	\$1,188.00		0.20	\$237.60										
07/28/2020	Mark Johnson (MTJ)	meet and confer call from J Gorman re proposed motions in connection w/ opposition to class certification	\$888.00		0.20	\$177.60										
07/28/2020	Mark Johnson (MTJ)	email to COC (.2) and call w/ GBW (.2) re Ds proposed motions to be filed with opp to class cert	\$888.00		0.40	\$355.20										
07/28/2020	Mark Johnson (MTJ)	com w/ GBW re Marryott ltr, motion for leave to add arbitration plaintiff	\$888.00		0.10	\$88.80										
07/28/2020	Mark Johnson (MTJ)	review ltr from OC re proposed mtn for leave to add arbitration plaintiff	\$888.00		0.10	\$88.80										
07/28/2020	Mark Johnson (MTJ)	research representation of absent class members at deposition and assertion of AC privilege	\$888.00		1.50	\$1,332.00										
07/28/2020	Mark Johnson (MTJ)	draft email to COC re representation of putative class members at depo, AC privilege	\$888.00		0.50	\$444.00										
07/29/2020	Lourdes Castro (LEC)	filing declaration of Hon. Andrew J. Guilford re appointed new disco special master	450		0.60	\$270.00		0.6	\$270.00							
07/29/2020	Lourdes Castro (LEC)	downloading, saving and mail processing depo transcripts and exhibits of deposition for Patrick Kennedy	450		0.40	\$180.00		0.4	\$180.00							
07/29/2020	Rachel Steyer (RLS)	depo prep call with cocounsel and declarant	775		1.70	\$1,317.50		1.7	\$1,317.50							
07/29/2020	Ryan Bonner (RAB)	Dowloanding and preparing production Sun027 on shared drive and Relativity	900		0.60	\$540.00		0.6	\$540.00							
07/29/2020	Travis Close (TCC)	review/analyze deposition transcript of Kennedy	\$888.00		0.40	\$355.20										
07/29/2020	Travis Close (TCC)	review order from Court on October 31, 2019 granting Belaire West Notice	\$888.00		0.30	\$266.40										
07/29/2020	Travis Close (TCC)	continue drafting motion to modify pleadings/amend complaint (Argument section c(1))	\$888.00		1.40	\$1,243.20										
07/29/2020	Travis Close (TCC)	continue drafting motion to modify pleadings/amend complaint (Argument section c(2))	\$888.00		1.70	\$1,509.60										

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				Worked			General Hrs	Fees	CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees	
07/29/2020	Guy Wallace (GBW)	com's with CJH; BU; MTJ re issues re classwide challenge to D.'s arbitration agreement; Plaintiffs' motion for leave to amend re proposed class representative re this issue	\$1,188.00	0.50		\$594.00									
07/29/2020	Guy Wallace (GBW)	tc with Marks; CJH; MT; BU; MTJ re deposition testimony of Dr. Flores; issues re alleged "discretion" of local executive directors re staffing	\$1,188.00	0.80		\$950.40									
07/29/2020	Guy Wallace (GBW)	review and analysis of CJH memo re provisions of D.'s arbitration agreement that are subject to challenge	\$1,188.00	0.40		\$475.20									
07/29/2020	Mark Johnson (MTJ)	litigation team call w/ CH, GBW, Thamer, Marks, Umpierre re Flores depo briefing, staffing analysis, assessment and service plan data, San Mateo analysis	\$888.00	1.20		\$1,065.60			1.2	1,065.60					
07/29/2020	Mark Johnson (MTJ)	participate in depo prep call with absent class member Leslie Greenfield	\$888.00	1.50		\$1,332.00									
07/29/2020	Mark Johnson (MTJ)	call w/ C Healey re strategy for meet and confer session w/ Sunrise re assessment and personal service plan data, privacy and HIPPA issues	\$888.00	0.40		\$355.20									
07/29/2020	Mark Johnson (MTJ)	emails w/ clerk, LEC and co-counsel re transmission of documents to discovery master; identification of same, filing of discovery master declaration	\$888.00	0.30		\$266.40									
07/30/2020	Lourdes Castro (LEC)	downloading; saving in folder and mail processing depo transcript for Dr. Cristina Flores	450	0.20		\$90.00	0.2	\$90.00							
07/30/2020	Rachel Steyer (RLS)	confirming deposition date w/ declarant	775	0.10		\$77.50	0.1	\$77.50							
07/30/2020	Rachel Steyer (RLS)	confirming deposition date	775	0.10		\$77.50	0.1	\$77.50							
07/30/2020	Mark Johnson (MTJ)	meet and confer w/ OC with BSU re assessment data, personal service plan data, D's responses to 6th sed of document requests.	\$888.00	1.50		\$1,332.00									
07/30/2020	Guy Wallace (GBW)	legal research and analysis re motions for leave to add additional proposed class representatives after Rule 16 cut off date	\$1,188.00	0.60		\$712.80									
07/30/2020	Guy Wallace (GBW)	com's with CJH; TCC re same	\$1,188.00	0.30		\$356.40									
07/30/2020	Mark Johnson (MTJ)	prep for meet and confer on assessment data and D's responses to doc requests, set, 6	\$888.00	0.70		\$621.60									
07/30/2020	Mark Johnson (MTJ)	review notes from MC call	\$888.00	0.10		\$88.80									
07/30/2020	Mark Johnson (MTJ)	review and edit BSU notes re same for distribution to team	\$888.00	0.10		\$88.80									
07/30/2020	Mark Johnson (MTJ)	review and propose edits to letter responding to OC concerning adding Falkenberg to complaint	\$888.00	0.10		\$88.80					0.2	177.6			
07/30/2020	Mark Johnson (MTJ)	emails w/ COC re same	\$888.00	0.10		\$88.80									
07/30/2020	Travis Close (TCC)	Continue drafting memo iso motion to amend (Arguments re: prejudice on defendants)	\$888.00	1.40		\$1,243.20									
07/31/2020	Lourdes Castro (LEC)	communication with RLS and RAB re residency agreements	450	0.10		\$45.00	0.1	\$45.00							
07/31/2020	Rachel Steyer (RLS)	confirming with co-counsel deposition date for declarant	775	0.10		\$77.50	0.1	\$77.50							
07/31/2020	Rachel Steyer (RLS)	answering question re depo prep	775	0.10		\$77.50	0.1	\$77.50							
07/31/2020	Rachel Steyer (RLS)	communications re depo prep	775	0.10		\$77.50	0.1	\$77.50							

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				Worked			General	CC Confs	Falkenberg	Travel		
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees
07/31/2020	Mark Johnson (MTJ)	draft further revisions to ltr response to OC re motion for leave to amend	\$888.00	0.30		\$266.40						
07/31/2020	Mark Johnson (MTJ)	email memo to COC re status of assessment data negotiations, open issues, strategy and projected time table	\$888.00	0.40		\$355.20						
07/31/2020	Travis Close (TCC)	Email to MTJ, CH, GBW re: analysis of cases supporting typicality for motion to amend	\$888.00	0.40		\$355.20						
07/31/2020	Travis Close (TCC)	research cases on where arbitration agreements did not defeat typicality	\$888.00	1.10		\$976.80						
07/31/2020	Travis Close (TCC)	Continue drafting memo iso motion to amend (argument re: more complete relief for class)	\$888.00	1.20		\$1,065.60						
07/31/2020	Guy Wallace (GBW)	review and analysis of case law re whether a plaintiff and proposed class representative who has not signed an arbitration agreement may challenge such an agreement on behalf of those who have signed same;	\$1,188.00	0.50		\$594.00						
07/31/2020	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.40		\$475.20						
08/03/2020	Rachel Steyer (RLS)	trying to set date for prep	775	0.10		\$77.50	0.1	\$77.50				
08/03/2020	Rachel Steyer (RLS)	communications within our firm and w/co-counsel related to finalizing dates for depo prep, obtaining declarant's files	775	0.40		\$310.00	0.4	\$310.00				
08/03/2020	Justin Proctor (JMP)	Review of document production, creation of overview spreadsheet	825	1.20		\$990.00	1.2	\$990.00				
08/03/2020	Rachel Steyer (RLS)	communications with client concerning deposition and prep scheduled	775	0.20		\$155.00	0.2	\$155.00				
08/03/2020	Rachel Steyer (RLS)	back and forth finalizing depo prep and schedule with declarant	775	0.10		\$77.50	0.1	\$77.50				
08/03/2020	Rachel Steyer (RLS)	communications with co-counsel re declarant's email and mailing address	775	0.10		\$77.50	0.1	\$77.50				
08/03/2020	Rachel Steyer (RLS)	email to declarant setting up depo prep time	775	0.10		\$77.50	0.1	\$77.50				
08/03/2020	Travis Close (TCC)	Review/analyze recent correspondence re: motion to amend	\$888.00	0.30		\$266.40						
08/03/2020	Travis Close (TCC)	Review 7/14 letter to Ds from BMU re: deficiencies in discovery responses	\$888.00	0.20		\$177.60						
08/03/2020	Travis Close (TCC)	analyze case authorities for late filing after deadline (motion to amend)	\$888.00	1.20		\$1,065.60						
08/03/2020	Travis Close (TCC)	continue drafting motion to amend (facts and procedural history)	\$888.00	1.40		\$1,243.20						
08/03/2020	Travis Close (TCC)	continue drafting motion to amend (argument: Ps have acted expediently)	\$888.00	1.40		\$1,243.20						
08/04/2020	Justin Proctor (JMP)	Creation of document production overview spreadsheet	825	1.90		\$1,567.50	1.9	\$1,567.50				
08/04/2020	Justin Proctor (JMP)	Review and summarizing of results of "discretion" search	825	1.70		\$1,402.50	1.7	\$1,402.50				
08/04/2020	Justin Proctor (JMP)	Review and summarizing of results of "discretion" search	825	1.30		\$1,072.50	1.3	\$1,072.50				
08/04/2020	Justin Proctor (JMP)	Review and summarizing of results of "discretion" search	825	1.80		\$1,485.00	1.8	\$1,485.00				
08/04/2020	Rachel Steyer (RLS)	email to declarant proposing time for depo prep/introductory call	775	0.10		\$77.50	0.1	\$77.50				
08/04/2020	Justin Proctor (JMP)	Creation of document production overview spreadsheet	825	1.10		\$907.50	1.1	\$907.50				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General Hrs	Fees	CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees	
08/04/2020	Travis Close (TCC)	run search/analysis on "discretion" for GBW	\$888.00	0.80		\$710.40									
08/04/2020	Travis Close (TCC)	email to JMP re: background of case	\$888.00	0.20		\$177.60									
08/04/2020	Travis Close (TCC)	Continue drafting motion for leave to modify scheduling order (prejudice to defendants)	\$888.00	1.30		\$1,154.40									
08/04/2020	Travis Close (TCC)	Continue analyzing cases provided by co-counsel for motion to amend	\$888.00	1.20		\$1,065.60									
08/04/2020	Travis Close (TCC)	Continue drafting motion to amend (futility section)	\$888.00	0.80		\$710.40									
08/04/2020	Travis Close (TCC)	Finish drafting motion to amend (Intro & conclusion)	\$888.00	1.40		\$1,243.20									
08/04/2020	Mark Johnson (MTJ)	calls (x2) w/ BSU re Romeo deposition and participation in same, logistics, prep session, potential areas of examination	\$888.00	0.40		\$355.20									
08/05/2020	Rachel Steyer (RLS)	email to MTJ to confirm intro prep call	775	0.10		\$77.50	0.1	\$77.50							
08/05/2020	Rachel Steyer (RLS)	call w/declarant to confirm prep call time, dial in info	775	0.10		\$77.50	0.1	\$77.50							
08/05/2020	Lourdes Castro (LEC)	downloading, re-naming and mail processing and saving in the depo folder	450	0.30		\$135.00	0.3	\$135.00							
08/05/2020	Rachel Steyer (RLS)	introductory prep call w/declarant	775	1.10		\$852.50	1.1	\$852.50							
08/05/2020	Rachel Steyer (RLS)	question to TBS re relativity and obtaining declarant's documents	775	0.10		\$77.50	0.1	\$77.50							
08/05/2020	Rachel Steyer (RLS)	call with MJ to discuss depo prep + Eilder MTC	775	0.30		\$232.50	0.3	\$232.50							
08/05/2020	Rachel Steyer (RLS)	reviewing emails from co-counsel re depo prep/take aways from first deposition	775	0.20		\$155.00	0.2	\$155.00							
08/05/2020	Rachel Steyer (RLS)	pulling relevant declarant docs, creating folder, emailing MTJ	775	0.20		\$155.00	0.2	\$155.00							
08/05/2020	Mark Johnson (MTJ)	telephonic attendance of Romeo depo (in 4 segments)	\$888.00	2.80		\$2,486.40									
08/05/2020	Mark Johnson (MTJ)	team call w/ CJH, GBW, M Thamer, D Marks, Stephanie, Travis, Guy re class cert reply; assessment data, service plan data, docs to compel, etc.	\$888.00	0.90		\$799.20			0.9		799.2				
08/05/2020	Mark Johnson (MTJ)	conference w/ GBW re strategy on motion to amend pleadings, proposed third amended complaint	\$888.00	0.40		\$355.20									
08/05/2020	Travis Close (TCC)	team call re: outstanding discovery, labor analysis, motions to compel, etc.	\$888.00	1.00		\$888.00			1		888				
08/05/2020	Mark Johnson (MTJ)	Call w/ R Steyer re docs for Wicht depo prep	\$888.00	0.10		\$88.80									
08/05/2020	Mark Johnson (MTJ)	depo prep call w/ Tanya Wicht	\$888.00	1.10		\$976.80									
08/05/2020	Mark Johnson (MTJ)	prep for depo prep call w/ Tanya Wicht	\$888.00	0.60		\$532.80									
08/05/2020	Guy Wallace (GBW)	review and analysis of draft of motion for leave to amend	\$1,188.00	1.10		\$1,306.80									
08/05/2020	Guy Wallace (GBW)	com's with CJH; MTJ re same	\$1,188.00	0.60		\$712.80									
08/05/2020	Guy Wallace (GBW)	tc with CJH; Marks; MT; MTJ; TCC re expert analysis of Sunrise facilities; motion for leave to amend; preparation of class cert reply	\$1,188.00	0.80		\$950.40									
08/05/2020	Guy Wallace (GBW)	review and analysis of outline of class cert reply brief	\$1,188.00	1.60		\$1,900.80									
08/05/2020	Guy Wallace (GBW)	legal research and analysis re discretion and commonality	\$1,188.00	1.00		\$1,188.00									
08/06/2020	Rachel Steyer (RLS)	email to MTJ re depo prep + documents	775	0.10		\$77.50	0.1	\$77.50							
08/07/2020	Ryan Bonner (RAB)	Email to E-Discovery provider regarding Co-Cousnells overlay request for files hosted on Reality	900	0.10		\$90.00	0.1	\$90.00							
08/07/2020	Rachel Steyer (RLS)	preparing files/link to send to declarant for review in advance of deposition	775	0.50		\$387.50	0.5	\$387.50							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
08/07/2020	Travis Close (TCC)	review/analyze correspondance summarizing recent depo with Caroline			\$888.00	0.40									
08/07/2020	Travis Close (TCC)	review/analyze letter from BMU to opposing counsel re: request to stay discovery until class cert ruling			\$888.00	0.20									
08/07/2020	Travis Close (TCC)	Review correspondance from opposing counsel re: PointClickCare docs			\$888.00	0.20									
08/07/2020	Travis Close (TCC)	legal research re: cases granting motion to amend 4-6 months after deadline			\$888.00	1.20									
08/07/2020	Guy Wallace (GBW)	legal research and analysis re legal standards re motion for leave to amend to add proposed additional class representatives after Rule 16 deadline			\$1,188.00	1.20									
08/07/2020	Guy Wallace (GBW)	review and analysis of letter from Maryott re P.'s alleged failure to produce expert documents responsive to D.'s subpoenas			\$1,188.00	0.30									
08/09/2020	Guy Wallace (GBW)	preparation and drafting of introduction for motion for leave to amend to add further proposed plaintiffs and class representatives			\$1,188.00	1.70									
08/10/2020	Rachel Steyer (RLS)	call w/declarant to confirm receipt of documents, review before depo prep call	775			0.10		\$77.50			0.1	\$77.50			
08/10/2020	Rachel Steyer (RLS)	email to declarant related to expected time for depo prep call	775			0.10		\$77.50			0.1	\$77.50			
08/10/2020	Rachel Steyer (RLS)	call with MTJ to confirm logistics for depo prep	775			0.10		\$77.50			0.1	\$77.50			
08/10/2020	Justin Proctor (JMP)	Completion of document production overview spreadsheet	825			0.60		\$495.00			0.6	\$495.00			
08/10/2020	Rachel Steyer (RLS)	depo prep call with MTJ and declarant	775			2.10		\$1,627.50			2.1	\$1,627.50			
08/10/2020	Rachel Steyer (RLS)	email to MTJ re depo prep	775			0.20		\$155.00			0.2	\$155.00			
08/10/2020	Lourdes Castro (LEC)	calendar dates in case per MTJ	450			0.10		\$45.00			0.1	\$45.00			
08/10/2020	Ryan Bonner (RAB)	Correcting Bates Stamp ranges for Unitized documents from defendant production SUN0000001-1120	900			2.30		\$2,070.00			2.3	\$2,070.00			
08/10/2020	Guy Wallace (GBW)	legal research and analysis re motions for leave to amend to add additional proposed class representatives			\$1,188.00	2.10		\$2,494.80							
08/10/2020	Travis Close (TCC)	review proposed depo exhibits for Lesley Greenfield (marketing packets & pricing information)			\$888.00	0.40		\$355.20							
08/10/2020	Travis Close (TCC)	Draft ntc of motion and mtn to amend			\$888.00	1.60		\$1,420.80							
08/10/2020	Travis Close (TCC)	edits/revisions to motion to amend			\$888.00	1.80		\$1,598.40							
08/10/2020	Travis Close (TCC)	Research/Analyze other successful ntc and motions to amend before drafting same			\$888.00	0.40		\$355.20							
08/10/2020	Mark Johnson (MTJ)	depo prep call with absent class member Tanya Wicht, assisted by Rachel Styer			\$888.00	2.00		\$1,776.00							
08/10/2020	Mark Johnson (MTJ)	prep for call w/ Tanya Wicht for depo prep, including review of declaration, documents and draft of possible questions and areas of examination			\$888.00	1.10		\$976.80							
08/10/2020	Mark Johnson (MTJ)	com w/ GBW re strategy for motion for leave to amend complaint, arbitration challenge			\$888.00	0.30		\$266.40							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General Hrs	Fees	CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees	
08/10/2020	Mark Johnson (MTJ)	com w/ R Steyer re depo prep for Tanya Wicht	\$888.00	0.10		\$88.80									
08/10/2020	Mark Johnson (MTJ)	coms w/ BU re Wicht depo exhibits, meeting and conferring re motion to file amended pleadings.	\$888.00	0.20		\$177.60									
08/11/2020	Lourdes Castro (LEC)	communication with MTJ re box deliver to the office for deposition	450	0.10		\$45.00	0.1	\$45.00							
08/11/2020	Mark Johnson (MTJ)	com w/ staff re depo materials and set up for Wicht depo email exchange w/ COC re proposed email to OC and strategy	\$888.00	0.10		\$88.80									
08/11/2020	Mark Johnson (MTJ)	for meeting and conferring re filing of motion for leave to amend complaint	\$888.00	0.20		\$177.60									
08/11/2020	Travis Close (TCC)	Locate/analysis of arbitration agreement for GBW	\$888.00	0.40		\$355.20									
08/11/2020	Travis Close (TCC)	Analyze representations in Ds motion to compel arbitration re: its arbitration provision	\$888.00	0.30		\$266.40									
08/11/2020	Travis Close (TCC)	Team meeting re: scheduling and strategy for motion to amend, upcoming depositions	\$888.00	0.60		\$532.80			0.6	532.8					
08/11/2020	Guy Wallace (GBW)	com's with CJH; MTJ; TCC re motion for leave to amend to add new proposed class representatives	\$1,188.00	0.60		\$712.80									
08/11/2020	Guy Wallace (GBW)	legal research and analysis re cases in which courts granted leave to amend to name additional plaintiffs after Rule 16 deadline	\$1,188.00	0.50		\$594.00									
08/12/2020	Rachel Steyer (RLS)	depo prep call with declarant and MTJ	775	1.60		\$1,240.00	1.6	\$1,240.00							
08/12/2020	Rachel Steyer (RLS)	reviewing docs prior to depo prep call	775	0.30		\$232.50	0.3	\$232.50							
08/12/2020	Ryan Bonner (RAB)	Preparing SUN030 production for hosting on Relativity	900	0.40		\$360.00	0.4	\$360.00							
08/12/2020	Mark Johnson (MTJ)	review 14 p. memo re challenge to arbitration clause	\$888.00	0.60		\$532.80									
08/12/2020	Mark Johnson (MTJ)	email GBW re thoughts on same	\$888.00	0.10		\$88.80									
08/12/2020	Travis Close (TCC)	Further analysis of cases shared by co-counsel where motion to amend was granted 4-6 mo after scheduling order deadline	\$888.00	1.30		\$1,154.40									
08/12/2020	Travis Close (TCC)	Legal research into cases in 9th circuit where court allowed addition of class representatives past pleadings deadline	\$888.00	1.60		\$1,420.80									
08/12/2020	Travis Close (TCC)	Research cases in C.D. Cal where court allowed addition of class representatives past pleadings deadline	\$888.00	1.70		\$1,509.60									
08/12/2020	Travis Close (TCC)	Analysis of cases found & summaries where court granted motion to add additional representatives	\$888.00	0.70		\$621.60									
08/12/2020	Guy Wallace (GBW)	revise and edit motion for leave to amend	\$1,188.00	4.10		\$4,870.80									
08/12/2020	Guy Wallace (GBW)	com's with MTJ; TCC; BU re same	\$1,188.00	0.70		\$831.60									
08/12/2020	Mark Johnson (MTJ)	telephonic depo prep session with Tanya Wicht	\$888.00	1.60		\$1,420.80									
08/12/2020	Mark Johnson (MTJ)	prep for defending Wicht depo and for prep session with her	\$888.00	1.80		\$1,598.40									
08/13/2020	Rachel Steyer (RLS)	listening in to deposition of class member declarant	775	4.40		\$3,410.00	4.4	\$3,410.00							
08/13/2020	Ryan Bonner (RAB)	Preparing production Sun031 for hosting on Relativity and Shared Drive	900	0.60		\$540.00	0.6	\$540.00							
08/13/2020	Travis Close (TCC)	review/analyze of Greenfield rough draft depo transcript	\$888.00	0.60		\$532.80									
08/13/2020	Guy Wallace (GBW)	revise and edit motion for leave to amend	\$1,188.00	4.40		\$5,227.20									
08/13/2020	Mark Johnson (MTJ)	defend on line depo of Tanya Wicht.	\$888.00	6.00		\$5,328.00									
08/13/2020	Mark Johnson (MTJ)	calls w/ Tanya Wicht re depo prep and recap (x4)	\$888.00	0.80		\$710.40									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
08/13/2020	Mark Johnson (MTJ)	call w/ GBW and email with BSU re Wicht depo		\$888.00	0.50						
08/14/2020	Lourdes Castro (LEC)	Saving in depo transcript folder and processing via file linker deposition transcript of Tanya Wicht	450		0.20		\$90.00				
08/14/2020	Guy Wallace (GBW)	revise and edit motion for leave to amend the Complaint review and analysis of cases granting leave to amend after deadline for amendments set by the district court's scheduling order		\$1,188.00	2.30		\$2,732.40				
08/14/2020	Guy Wallace (GBW)	Review/analyze edits & additions to motion to amend by GBW		\$1,188.00	1.50		\$1,782.00				
08/14/2020	Travis Close (TCC)	legal research and analysis re standard of proof re class certification motions and whether "significant proof" requirement applies outside of the context of Title VII or employment cases		\$888.00	0.70		\$621.60				
08/16/2020	Guy Wallace (GBW)	work on draft third amended complaint		\$888.00	2.00		\$1,776.00				
08/16/2020	Mark Johnson (MTJ)	Downloading; saving in client folder; re naming and processing via file linker exhibits for deposition transcripts	450		0.50		\$225.00		0.5		\$225.00
08/17/2020	Ryan Bonner (RAB)	Uploading and preparing production Sun031 for hosting on Relativity	900		0.20		\$180.00		0.2		\$180.00
08/17/2020	Mark Johnson (MTJ)	work on third amended complaint		\$888.00	1.40		\$1,243.20				
08/17/2020	Mark Johnson (MTJ)	email exchange w/ CJH re strategy for third amended complaint and pleading subclass.		\$888.00	0.30		\$266.40				
08/18/2020	Lourdes Castro (LEC)	saving in depo transcript folder and processing it via file linker	450		0.10		\$45.00		0.1		\$45.00
08/18/2020	Guy Wallace (GBW)	com's with MTJ re Third Amended Complaint and inclusion of proposed subclass		\$1,188.00	0.40		\$475.20				
08/18/2020	Guy Wallace (GBW)	review and analysis of CJH com's re same		\$1,188.00	0.20		\$237.60				
08/18/2020	Guy Wallace (GBW)	review and analysis of BU proposed edits to draft of motion for leave to amend		\$1,188.00	0.60		\$712.80				
08/18/2020	Mark Johnson (MTJ)	call w/ GBW re strategy on proposed amended complaint		\$888.00	0.40		\$355.20				
08/18/2020	Mark Johnson (MTJ)	call w/ CJH re strategy for amended pleading, subclass issue and definition of subclass		\$888.00	0.80		\$710.40				
08/18/2020	Mark Johnson (MTJ)	follow up call w/ GBW re strategy for amending complaint and definition of proposed subclass.		\$888.00	0.20		\$177.60				
08/18/2020	Guy Wallace (GBW)	review and analysis of CJH edits to motion for leave to amend; declaration of BU re same		\$1,188.00	0.70		\$831.60				
08/19/2020	Lourdes Castro (LEC)	communication with GBW re motion filing	450		0.10		\$45.00		0.1		\$45.00
08/19/2020	Lourdes Castro (LEC)	communication with TBS re upcoming filing	450		0.10		\$45.00		0.1		\$45.00
08/19/2020	Ryan Bonner (RAB)	Email to co-counsel regarding SUN029 production	900		0.20		\$180.00		0.2		\$180.00
08/19/2020	Ryan Bonner (RAB)	Downloading and Preparing production SUN029 for hosting on Relativity	900		0.20		\$180.00		0.2		\$180.00
08/19/2020	Ryan Bonner (RAB)	Preparing Index for Defendant Production Sun0001796 to Sun0102103	900		1.20		\$1,080.00		1.2		\$1,080.00
08/19/2020	Guy Wallace (GBW)	revise and edit draft of motion for leave to amend		\$1,188.00	2.40		\$2,851.20				
08/19/2020	Guy Wallace (GBW)	legal research and analysis re cases cited therein		\$1,188.00	1.00		\$1,188.00				
08/19/2020	Mark Johnson (MTJ)	continue working on draft proposed TAC		\$888.00	4.50		\$3,996.00				
08/19/2020	Mark Johnson (MTJ)	coms w/ COC re same		\$888.00	0.20		\$177.60				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
<u>Fees</u>						Hrs	Fees	Hrs	Fees	Hrs	Fees
08/20/2020	Lourdes Castro (LEC)	communication with GBW re document for filing	450		0.10		\$45.00				
08/20/2020	Lourdes Castro (LEC)	running tables in draft document	450		3.30		\$1,485.00				
08/20/2020	Ryan Bonner (RAB)	Managing email Inbox: Organizing files related to Heredia v. Sunrise production	900		0.40		\$360.00				
08/20/2020	Mark Johnson (MTJ)	email exchange w/ Tanya Wicht re depo transcript review		\$888.00	0.10		\$88.80				
08/20/2020	Guy Wallace (GBW)	legal research and analysis re cases cited in draft of motion for leave to amend		\$1,188.00	1.00		\$1,188.00				
08/20/2020	Guy Wallace (GBW)	search for other cases re Rule 15-16		\$1,188.00	0.50		\$594.00				
08/20/2020	Guy Wallace (GBW)	review and analysis of draft motion for leave for amend; Declaration of Umpierre; proposed Third Amended Complaint		\$1,188.00	2.80		\$3,326.40				
08/20/2020	Guy Wallace (GBW)	revise and edit same		\$1,188.00	1.00		\$1,188.00				
08/20/2020	Guy Wallace (GBW)	com's with CJH; MTJ re P's class cert motion & D's arguments re discretion and decentralization		\$1,188.00	0.80		\$950.40				
08/21/2020	Lourdes Castro (LEC)	finalizing and filing motion for leave to amend	450		1.10		\$495.00	1.1	\$495.00		
08/21/2020	Lourdes Castro (LEC)	woking on documents for filing motion to leave to amend	450		3.50		\$1,575.00	3.5	\$1,575.00		
08/21/2020	Ryan Bonner (RAB)	Indexing Production SUN0003125 - SUN0004031 (36 Documents)	900		0.40		\$360.00	0.4	\$360.00		
08/21/2020	Ryan Bonner (RAB)	Indexing production SUN0004369 - SUN0004353 (167 Documents)	900		1.70		\$1,530.00	1.7	\$1,530.00		
08/21/2020	Ryan Bonner (RAB)	Indexing production SUN0004377 - SUN0016198 (119 Documents)	900		1.40		\$1,260.00	1.4	\$1,260.00		
08/21/2020	Ryan Bonner (RAB)	Indexing production SUN0017726 - SUN0017736 (286 Documents)	900		1.20		\$1,080.00	1.2	\$1,080.00		
08/21/2020	Ryan Bonner (RAB)	Email to Brian Umpierre regarding hosting of Sun032 documents for Thursday's deposition	900		0.10		\$90.00	0.1	\$90.00		
08/21/2020	Guy Wallace (GBW)	revise and edit motion for leave to amend Complaint		\$1,188.00	1.10		\$1,306.80				
08/21/2020	Guy Wallace (GBW)	review and analysis of further draft of motion for leave to amend; revise and edit same		\$1,188.00	3.10		\$3,682.80				
08/21/2020	Guy Wallace (GBW)	com's with MTJ re same		\$1,188.00	0.30		\$356.40				
08/21/2020	Guy Wallace (GBW)	review and analysis of draft of Third Amended Complaint		\$1,188.00	1.10		\$1,306.80				
08/21/2020	Guy Wallace (GBW)	revise and edit same		\$1,188.00	0.20		\$237.60				
08/21/2020	Guy Wallace (GBW)	com's with MTJ re same (.4)		\$1,188.00	0.40		\$475.20				
08/21/2020	Guy Wallace (GBW)	preparation and drafting of proposed order re motion for leave to amend		\$1,188.00	0.40		\$475.20				
08/21/2020	Guy Wallace (GBW)	revise and edit same		\$1,188.00	0.20		\$237.60				
08/21/2020	Guy Wallace (GBW)	review and analysis of drafts of motion for GAL re Arora		\$1,188.00	0.20		\$237.60				
08/21/2020	Guy Wallace (GBW)	com's with CJH;BU; MTJ re same		\$1,188.00	0.20		\$237.60				
08/21/2020	Guy Wallace (GBW)	com's with MTJ; LEC re preparation of motion for filing		\$1,188.00	0.40		\$475.20				
08/21/2020	Mark Johnson (MTJ)	complete draft of proposed TAC		\$888.00	1.60		\$1,420.80				
08/24/2020	Lourdes Castro (LEC)	researching judge Staton re chambers copies comm with the team re same	450		1.20		\$540.00	1.2	\$540.00		
08/24/2020	Travis Close (TCC)	review/analyze final edits to motion to amend made by co-counsel		\$888.00	0.40		\$355.20				
08/24/2020	Mark Johnson (MTJ)	coms w/ GBW re strategy on declarant depo withdrawal and strategy for redactions of docs to be produced.		\$888.00	0.30		\$266.40				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
08/24/2020	Mark Johnson (MTJ)	review case law cited by Ds iso motion to dismiss UCL and equitable claims	\$888.00	0.40		\$355.20									
08/24/2020	Mark Johnson (MTJ)	coms w/ GBW and CH re same	\$888.00	0.20		\$177.60									
08/24/2020	Mark Johnson (MTJ)	email exchanges w/ Ds proposed motion to dismiss UCL and equitable claims and scheduling M&C	\$888.00	0.20		\$177.60									
08/24/2020	Guy Wallace (GBW)	com's with CJH; MTJ re issue of depositions of class declarants and possibility of withdrawing declarations of any declarant(s) that do not wish to appear for deposition	\$1,188.00	0.40		\$475.20									
08/24/2020	Guy Wallace (GBW)	analysis of D's proposed motion for judgment on the pleadings re availability of equitable relief	\$1,188.00	0.40		\$475.20									
08/25/2020	Mark Johnson (MTJ)	meet and confer w/ OC Ashley Allyn and Michael Holecek and BSU re partial mtn for judgment on the pleadings re equitable relief.	\$888.00	0.20		\$177.60									
08/25/2020	Mark Johnson (MTJ)	call w/ C Healey re arguments in opposition to proposed mtn for partial judgment on the pleadings based on adequate remedy at law; strategy for meet and confer w/ OC	\$888.00	0.40		\$355.20									
08/25/2020	Mark Johnson (MTJ)	follow up call w/ Healey re proposed mtn for judgment on the pleadings and meet and confer call re same	\$888.00	0.20		\$177.60									
08/25/2020	Mark Johnson (MTJ)	com (x2) w/ GBW re D's arguments on proposed partial mtn for judgment on the pleadings re adequate remedy at law.	\$888.00	0.30		\$266.40									
08/26/2020	Lourdes Castro (LEC)	Saving depo transcripts in folder and processing via File Linker	450	0.20		\$90.00	0.2	\$90.00							
08/26/2020	Ryan Bonner (RAB)	Indexing SUN0017878 - SUN0018056	900	1.70		\$1,530.00	1.7	\$1,530.00							
08/26/2020	Mark Johnson (MTJ)	meet and confer w/ OC re daubert motions and other motions and evidentiary objections	\$888.00	0.50		\$444.00									
08/26/2020	Mark Johnson (MTJ)	review stip and filings re hearing date and briefing schedule on motion for leave to amend for prep for call with court	\$888.00	0.20		\$177.60									
08/26/2020	Mark Johnson (MTJ)	call to court w/ OC re rescheduled hearing date on motion for leave to amend complaint and conflict with stipulation	\$888.00	0.10		\$88.80									
08/26/2020	Mark Johnson (MTJ)	email to COC summarizing meet and confer w/ OC re Daubert motions and evidentiary objection	\$888.00	0.10		\$88.80									
08/26/2020	Mark Johnson (MTJ)	email re com w/ clerk re hearing date	\$888.00	0.20		\$177.60									
08/26/2020	Mark Johnson (MTJ)	review of new pre-trial disclosures from D, redline of witness descriptions contrasting new with prior descriptions	\$888.00	0.20		\$177.60									
08/26/2020	Mark Johnson (MTJ)	emails w/ COC re new materials and MIL strategies	\$888.00	0.20		\$177.60									
08/27/2020	Mark Johnson (MTJ)	research re inherently transitory class claims and standing/mootness for proposed mtn for partial judgment on the pleadings.	\$888.00	0.70		\$621.60									
08/27/2020	Guy Wallace (GBW)	legal research and analysis re Ninth Circuit's Sonner decision	\$1,188.00	0.80		\$950.40									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General Hrs	Fees	CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees	
08/27/2020	Guy Wallace (GBW)	com's with CJH; MTJ; MAY re plaintiff who is a current resident with standing to seek injunctive relief	\$1,188.00	0.50		\$594.00									
08/28/2020	Rachel Steyer (RLS)	reviewing emails re JOP, communications with co-counsel re locating new class rep, reviewing declarations and answer to MTJ question	775	0.20		\$155.00	0.2	\$155.00							
08/28/2020	Guy Wallace (GBW)	legal research and analysis re transitory exception to mootness for class representatives	\$1,188.00	0.90		\$1,069.20									
08/28/2020	Guy Wallace (GBW)	com's with CJH; MTJ re D's proposed petition to compel arbitration re Falkenberg	\$1,188.00	0.60		\$712.80				0.6			712.8		
08/28/2020	Guy Wallace (GBW)	review and analysis of draft of opposition points re D's motion for judgment on the pleadings	\$1,188.00	0.70		\$831.60									
08/28/2020	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20		\$237.60									
08/28/2020	Guy Wallace (GBW)	com's with MTJ re addition of Greenfield as a Plaintiff who is a current resident	\$1,188.00	0.70		\$831.60									
08/28/2020	Mark Johnson (MTJ)	review draft email to OC re Ziehl depo and declaration and comment on same	\$888.00	0.10		\$88.80									
08/29/2020	Guy Wallace (GBW)	legal research and analysis re inherently transitory exception to mootness for putative class representatives	\$1,188.00	1.00		\$1,188.00									
08/29/2020	Guy Wallace (GBW)	com's with DM; KAS; MTJ re same (.3)	\$1,188.00	0.30		\$356.40									
08/29/2020	Guy Wallace (GBW)	review and analysis of draft of opposition points re D's motion for judgment on the pleadings re lack of federal jurisdiction	\$1,188.00	1.20		\$1,425.60									
08/29/2020	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20											
08/29/2020	Mark Johnson (MTJ)	call w/ GBW re arbitration issues and strategy on opp to mtn for judgment on the pleadings.	\$888.00	0.40		\$355.20									
08/30/2020	Guy Wallace (GBW)	legal research and analysis re inherently transitory exception re mootness and claims of putative class representative	\$1,188.00	4.40		\$5,227.20									
08/30/2020	Mark Johnson (MTJ)	call w/ GBW re research on inherently transitory exception to mootness / standing and mtns for judgment on the pleadings and mtn to compel arbitration	\$888.00	0.30		\$266.40									
08/31/2020	Travis Close (TCC)	Legal research re: deadline for filing opposing papers in motions	\$888.00	0.40		\$355.20									
08/31/2020	Travis Close (TCC)	Review docket re: deadline for Ds to respond to motion to amend	\$888.00	0.20		\$177.60									
08/31/2020	Travis Close (TCC)	Legal research re: 5 day rule (arbitration petition) / shared by co-counsel	\$888.00	0.70		\$621.60									
08/31/2020	Travis Close (TCC)	Review MY's notes following depo of Lynda Lahman	\$888.00	0.40		\$355.20									
08/31/2020	Mark Johnson (MTJ)	email exchanges and call w/ OC Joe Gorman re proposed petition to compel arbitration	\$888.00	0.30		\$266.40									
08/31/2020	Mark Johnson (MTJ)	call w/ GBW re strategy on opp to petition to compel arbitration, results of research.	\$888.00	0.30		\$266.40									
08/31/2020	Mark Johnson (MTJ)	research re decision-maker on arbitrability issues.	\$888.00	0.80		\$710.40									
08/31/2020	Mark Johnson (MTJ)	research Section 4 of FAA and case law re jurisdictional issue	\$888.00	0.70		\$621.60									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs		Falkenberg		Travel		
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
08/31/2020	Mark Johnson (MTJ)	email memo to counsel responding to propose strategy for opposing petition to compel arbitration and describing points to be made, results of research on jurisdiction.	\$888.00	0.70		\$621.60									
08/31/2020	Mark Johnson (MTJ)	draft email memo to COC, file re research results on Q of who decides enforceability of arbitration agreement.	\$888.00	0.40		\$355.20									
08/31/2020	Guy Wallace (GBW)	legal research and analysis re inherently transitory exception to mootness re claims of putative class representative	\$1,188.00	2.40		\$2,851.20									
08/31/2020	Guy Wallace (GBW)	com's with CJH; MTJ re arbitration issues re Falkenberg and D's proposed petition re same review and analysis of case law re inherently transitory exception to mootness for injunctive relief claims of a putative class representative	\$1,188.00	0.60		\$712.80					0.6			712.8	
09/01/2020	Guy Wallace (GBW)	preparation of points re same	\$1,188.00	1.00		\$1,188.00									
09/01/2020	Guy Wallace (GBW)	review and analysis of D's mtn for judgment on the pleadings re UCL claim	\$1,188.00	2.20		\$2,613.60									
09/01/2020	Mark Johnson (MTJ)	coms w/ COC re same	\$888.00	0.20		\$177.60									
09/01/2020	Mark Johnson (MTJ)	draft ltr to OC re proposed petition to compel arbitration and responding to ltr re same	\$888.00	1.10		\$976.80									
09/01/2020	Mark Johnson (MTJ)	review proposed edits from CJH to ltr re petition to compel arbitration	\$888.00	0.10		\$88.80									
09/01/2020	Mark Johnson (MTJ)	email exchange re same	\$888.00	0.10		\$88.80									
09/01/2020	Guy Wallace (GBW)	review and analysis of D's motion for judgment on the pleadings	\$1,188.00	0.50		\$594.00									
09/01/2020	Guy Wallace (GBW)	review and analysis of D's supplemental disclosures	\$1,188.00	0.40		\$475.20									
09/02/2020	Travis Close (TCC)	Legal research re: whether Ps have adequate remedy at law on UCL claim (Sonner v. Premier - 2020 WL 4882896)	\$888.00	0.40		\$355.20									
09/02/2020	Travis Close (TCC)	Review/analyze Ds notice and motion for judgement on pleadings	\$888.00	0.50		\$444.00									
09/02/2020	Mark Johnson (MTJ)	com w/ OC Gorman re briefing schedule on mtn for leave to amend pleadings.	\$888.00	0.10		\$88.80									
09/02/2020	Travis Close (TCC)	Review/analyze Ds notice of motion and motion to strike declaration of dale schroyer	\$888.00	0.60		\$532.80									
09/02/2020	Travis Close (TCC)	Review SWCK and co-counsel communications re: whether adequate relief is available under UCL	\$888.00	0.30		\$266.40									
09/02/2020	Guy Wallace (GBW)	com's with CJH; MTJ; BU re D's motion for judgment on the pleadings and P.'s opposition thereto and schedule re same	\$1,188.00	0.70		\$831.60									
09/02/2020	Guy Wallace (GBW)	legal research and analysis re D's argument that P.'s Complaint must expressly allege that remedies at law are inadequate	\$1,188.00	0.50		\$594.00									
09/02/2020	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20		\$237.60									
09/02/2020	Guy Wallace (GBW)	preparation of argument re Fearn and Ganz can represent current Sunrise residents for injunctive relief pursuant to the inherently transitory exception and line of cases	\$1,188.00	2.30		\$2,732.40									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions					
				Worked			General	CC Confs	Falkenberg	Travel		
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees
09/02/2020	Mark Johnson (MTJ)	research re sufficiency of allegations re inadequate legal remedy for injunctive or other equitable relief, including review of O'shea and cases cited by Defendants.	\$888.00	1.00		\$888.00						
09/02/2020	Mark Johnson (MTJ)	emails to COC Healey, Wallace re analysis of cases on inadequate remedy at law and sufficiency of pleading	\$888.00	0.40		\$355.20						
09/02/2020	Mark Johnson (MTJ)	review D's mtn to exclude Schroyer declaration iso class cert	\$888.00	0.30		\$266.40						
09/03/2020	Lourdes Castro (LEC)	re-naming unredacted docs filing and processing them via file linker	450	0.30		\$135.00	0.3	\$135.00				
09/03/2020	Lourdes Castro (LEC)	checking Docketbird and update new deadlines	450	0.80		\$360.00	0.8	\$360.00				
09/03/2020	Lourdes Castro (LEC)	communication with MTJ and GBW re binders class cert-related docs	450	0.10		\$45.00	0.1	\$45.00				
09/03/2020	Travis Close (TCC)	Legal research on "inherently transitory" exception to mootness	\$888.00	1.20		\$1,065.60						
09/03/2020	Travis Close (TCC)	Analyze of case docket to determine when plaintiffs dupress and wilkerson left facilities in Brown et al v. District of Columbia	\$888.00	1.40		\$1,243.20						
09/03/2020	Guy Wallace (GBW)	review and analysis of D's opposition to motion for class certification	\$1,188.00	2.20		\$2,613.60						
09/03/2020	Guy Wallace (GBW)	com's with MTJ re same (.3)	\$1,188.00	0.30		\$356.40						
09/03/2020	Guy Wallace (GBW)	preparation and drafting of argument re P's qualify for inherently transitory exception	\$1,188.00	3.80		\$4,514.40						
09/03/2020	Guy Wallace (GBW)	com's with TCC re Thorpe case and whether P's herein qualify for inherently transitory exception	\$1,188.00	0.40		\$475.20						
09/03/2020	Mark Johnson (MTJ)	download class cert opposition files from Ds and coms w/ COC re getting copies to them via dropbox, accellion, etc.	\$888.00	0.90		\$799.20						
09/03/2020	Mark Johnson (MTJ)	begin review of Ds papers in opposition to class certification mtn	\$888.00	1.80		\$1,598.40						
09/04/2020	Lourdes Castro (LEC)	printing and putting together binders for GBW and MTJ	450	4.70		\$2,115.00	4.7	\$2,115.00				
09/04/2020	Guy Wallace (GBW)	com's with CJH; Marks; BU; MTJ re D's class cert opposition filings	\$1,188.00	1.20		\$1,425.60						
09/04/2020	Guy Wallace (GBW)	review and analysis of D's class cert opposition brief and reply arguments and points re same	\$1,188.00	2.30		\$2,732.40						
09/04/2020	Guy Wallace (GBW)	legal research and analysis re Ninth Circuit decision in Grodnitsky re expert testimony and standards re evaluation of same	\$1,188.00	0.60		\$712.80						
09/04/2020	Mark Johnson (MTJ)	team call w/ CJH, GBW, BSU, Yarnall, Thamer, Marks, Foss, re planning for reply iso mtn for class cert, actions to be taken and tasks for same, discovery, opp to motions to strike expert declarations	\$888.00	1.00		\$888.00			1	888		
09/04/2020	Mark Johnson (MTJ)	review and draft additional paragraph for inclusion in Greenfield retainer agreement	\$888.00	0.20		\$177.60						
09/04/2020	Mark Johnson (MTJ)	coms w/ COC re same	\$888.00	0.20		\$177.60						
09/04/2020	Mark Johnson (MTJ)	finalize and send ltr to OC re proposed petition for arbitration	\$888.00	0.20		\$177.60						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
Fees						Hrs	Fees	Hrs	Fees	Hrs	Fees
09/04/2020	Mark Johnson (MTJ)	review papers iso opposition to class cert and motions to strike expert declarations.	\$888.00		2.30		\$2,042.40				
09/06/2020	Guy Wallace (GBW)	review and analysis of Brown decision from Judge Gee	\$1,188.00		0.30		\$356.40				
09/06/2020	Guy Wallace (GBW)	com's with CJH; BU; MTJ re same	\$1,188.00		0.20		\$237.60				
09/08/2020	Lourdes Castro (LEC)	working in creating a spreadsheet re ECF docs filed in the case		450	1.50		\$675.00	1.5	\$675.00		
09/08/2020	Mark Johnson (MTJ)	call w/ BSU re discovery conference for Thursday; strategy on procedures to proposes, priorities and some substance of the motions.	\$888.00		0.80		\$710.40				
09/08/2020	Mark Johnson (MTJ)	review BSU memo on status and substance of outstanding and pending discovery issues for discovery conference on Thursday.	\$888.00		0.50		\$444.00				
09/08/2020	Mark Johnson (MTJ)	review filings and docket for missing exhibits	\$888.00		0.30		\$266.40				
09/08/2020	Mark Johnson (MTJ)	email to COC re structure of filing and missing exhibits.	\$888.00		0.20		\$177.60				
09/09/2020	Lourdes Castro (LEC)	saving in the deposition transcript folder and processing via file linker email and depo transcripts for Lynda Lahman		450	0.20		\$90.00	0.2	\$90.00		
09/09/2020	Lourdes Castro (LEC)	working on Heredia spreadsheet and emailing it to MTJ		450	0.70		\$315.00	0.7	\$315.00		
09/09/2020	Travis Close (TCC)	Analyze variations of arbitration agreements - how parties split costs	\$888.00		0.60		\$532.80				
09/09/2020	Mark Johnson (MTJ)	draft email to COC re strategy for discovery planning mtg, priorities for mtns and proposed procedure and format for presenting disputes to discovery master.	\$888.00		0.50		\$444.00				
09/09/2020	Mark Johnson (MTJ)	call and email exchange w/ Judge Guilford's case manager re scope of discovery planning call.	\$888.00		0.10		\$88.80				
09/10/2020	Mark Johnson (MTJ)	discovery planning conference w/ Judge Guilford	\$888.00		0.90		\$799.20				
09/10/2020	Mark Johnson (MTJ)	email to OC A Allyn re assessment data and exemplar	\$888.00		0.10		\$88.80				
09/10/2020	Mark Johnson (MTJ)	meet and confer w/ OC A. Allen and Jordan Johnson re mtn to compel Falkenberg arbitration.	\$888.00		0.40		\$355.20			0.4	355.2
09/10/2020	Travis Close (TCC)	Continue analysis of arbitration agreements for language re: parties apportionment of cost	\$888.00		0.50		\$444.00				
09/10/2020	Mark Johnson (MTJ)	email exchange w/ COC summarizing meet and confer on mtn to compel arbitration and discussing strategy for opposition and related case assignment.	\$888.00		0.30		\$266.40				
09/11/2020	Rachel Steyer (RLS)	reviewing privilege log and files to determine whether any harmful docs to disclose, corresponding with co-counsel re this matter		775	0.30		\$232.50	0.3	\$232.50		
09/11/2020	Rachel Steyer (RLS)	preparing email attachments, sending email to co-counsel to review communications with class members		775	0.20		\$155.00	0.2	\$155.00		
09/11/2020	Mark Johnson (MTJ)	com w/ Healey, Umpierre, GBW re discovery conference, allocation of strategy on supplemental brief; petition and motion to compel arbitration.	\$888.00		0.90		\$799.20				
09/11/2020	Mark Johnson (MTJ)	call w/ GBW re discovery issues and petition to compel arbitration	\$888.00		0.20		\$177.60				
09/14/2020	Travis Close (TCC)	Review/analyze draft of Ps further supplemental memo re: motions pending	\$888.00		0.20		\$177.60				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs		Hrs		Hrs		Hrs	
09/14/2020	Mark Johnson (MTJ)	finish drafting further supplemental brief iso mtn to compel assesment / service plan data and opposition to motion to compel putative class member data	\$888.00	1.50		\$1,332.00								
09/14/2020	Mark Johnson (MTJ)	coms w/ BSU re same and review BSU edits.	\$888.00	0.20		\$177.60								
09/15/2020	Rachel Steyer (RLS)	reviewing emails from co-counsel re disclosing communications with putative class members	775	0.10		\$77.50	0.1	\$77.50						
09/15/2020	Guy Wallace (GBW)	com's with CJH re class cert opposition brief	\$1,188.00	0.20		\$237.60								
09/16/2020	Rachel Steyer (RLS)	question to co-counsel re potential call	775	0.10		\$77.50	0.1	\$77.50						
09/16/2020	Rachel Steyer (RLS)	teleconference with co-counsel	775	0.80		\$620.00	0.8	\$620.00						
09/16/2020	Lourdes Castro (LEC)	finalizing and filing supp memo re motion pending	450	0.60		\$270.00	0.6	\$270.00						
09/16/2020	Lourdes Castro (LEC)	comms with MTJ re finalizing and filing supp memo re motion pending	450	0.10		\$45.00	0.1	\$45.00						
09/16/2020	Travis Close (TCC)	Review/analyze draft joint stip re: budget related ESI team planning mtg (telephonic) including CJH, Arns, Yarnall, Foss, Steyer, Warren, Umpierre, Marks and others re discovery related to class cert repy, including depositions of putative class members, Sunrise staff and management, document requests and enforcement of prior requests, including pending motions	\$888.00	0.30		\$266.40								
09/16/2020	Mark Johnson (MTJ)	draft email to COC re upgrade of doc mgmt system	\$888.00	0.10		\$88.80					0.9		799.2	
09/16/2020	Mark Johnson (MTJ)	email to RAB re adding access for RCF	\$888.00	0.10		\$88.80								
09/16/2020	Mark Johnson (MTJ)	review and analyze D's second supp memo re discovery mtns 167 and 169	\$888.00	0.10		\$88.80								
09/16/2020	Mark Johnson (MTJ)	email to D Marks re same	\$888.00	0.20		\$177.60								
09/16/2020	Mark Johnson (MTJ)	com w/ GBW re discovery plan for class cert reply	\$888.00	0.30		\$266.40								
09/17/2020	Travis Close (TCC)	Review and analysis of Ds second supplemental briefing re pending discovery, including reasons for withholding resident ISPs and resident assessment data	\$888.00	0.40		\$355.20								
09/17/2020	Guy Wallace (GBW)	legal research and analysis re issue of whether all class members must satisfy Article III standing, and at what stage of case; Ramirez v. TransUnion and cert petition re same	\$1,188.00	0.30		\$356.40								
09/17/2020	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20		\$237.60								
09/18/2020	Travis Close (TCC)	Research cases cited in Ds brief re: contract provisions as common proof of misrepresentations	\$888.00	0.70		\$621.60								
09/18/2020	Travis Close (TCC)	Review and analyze Def's opposition to Ps motion for class cert	\$888.00	0.80		\$710.40								
09/18/2020	Guy Wallace (GBW)	review and analysis of D's opposition to P's motion for leave to amend	\$1,188.00	0.70		\$831.60								
09/20/2020	Guy Wallace (GBW)	review and analysis of draft of class cert reply brief	\$1,188.00	1.30		\$1,544.40								
09/21/2020	Lourdes Castro (LEC)	processing via file linker docs filed under seal	450	0.20		\$90.00	0.2	\$90.00						
09/21/2020	Lourdes Castro (LEC)	communication with MTJ re downloading and processing documents filed under seal	450	0.10		\$45.00	0.1	\$45.00						
09/21/2020	Guy Wallace (GBW)	preparation of comments and proposed areas for revision and further discovery re draft of class cert reply brief	\$1,188.00	1.10		\$1,306.80								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions										
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees			
09/21/2020	Travis Close (TCC)	Review case sent by co-counsel on Rule 26 issue for reply to Opp	\$888.00	0.40		\$355.20											
09/21/2020	Travis Close (TCC)	Review analysis by GBW re: additional evidence needed for reply brief	\$888.00	0.30		\$266.40											
09/21/2020	Travis Close (TCC)	Review/analyze draft reply brief (iso class cert) by co-counsel	\$888.00	0.70		\$621.60											
09/21/2020	Travis Close (TCC)	Legal research re: holding of O'connor v. Uber technologies and whether arbitration reps defeats commonality	\$888.00	0.30		\$266.40											
09/21/2020	Travis Close (TCC)	Review/analyze Ds opposition to motion to modify scheduling order and for leave to file third amended complaint	\$888.00	0.50		\$444.00											
09/21/2020	Guy Wallace (GBW)	legal research and analysis re case law re minor factual variations do not defeat commonality, typicality or class certification	\$1,188.00	0.70		\$831.60											
09/21/2020	Guy Wallace (GBW)	review and analysis of D's opposition to P's motion for leave to amend	\$1,188.00	1.20		\$1,425.60											
09/21/2020	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.60		\$712.80											
09/21/2020	Mark Johnson (MTJ)	review preliminary draft of reply iso class certification and GBW list of big picture comments re same	\$888.00	1.60		\$1,420.80											
09/21/2020	Mark Johnson (MTJ)	review and analysis of D's opposition to mtn to extend deadline for amendment and for leave to amend to add plaintiffs.	\$888.00	0.70		\$621.60											
09/21/2020	Mark Johnson (MTJ)	call w/ GBW re analysis of Ds opp to mtn to extend deadline for moving to amend and for leave to amend and strategy for responding to same	\$888.00	0.70		\$621.60											
09/21/2020	Mark Johnson (MTJ)	email exchange w/ OC A Allyn re status of data exemplar for assessment data	\$888.00	0.10		\$88.80											
09/22/2020	Guy Wallace (GBW)	review and analysis of D's opposition to motion for leave to amend	\$1,188.00	1.90		\$2,257.20											
09/22/2020	Guy Wallace (GBW)	com's with CJH; BU; MTJ re same (.6)	\$1,188.00	0.60		\$712.80											
09/22/2020	Guy Wallace (GBW)	legal research and analysis re Ninth Circuit's O'Connor decision and other cases cited by Defendants	\$1,188.00	1.00		\$1,188.00											
09/22/2020	Mark Johnson (MTJ)	coms w/ OC AA re production of data exemplar	\$888.00	0.10		\$88.80											
09/22/2020	Mark Johnson (MTJ)	attempt to access data exemplar from sharefile	\$888.00	0.10		\$88.80											
09/22/2020	Mark Johnson (MTJ)	coms w/ COC re same	\$888.00	0.10		\$88.80											
09/23/2020	Guy Wallace (GBW)	review and analysis of D's opposition to P's motion for leave to amend	\$1,188.00	3.20		\$3,801.60						3.2	4,514.40				
09/23/2020	Guy Wallace (GBW)	com's with MTJ re same and arbitration re Falkenberg	\$1,188.00	0.60		\$712.80						0.6	712.80				
09/23/2020	Travis Close (TCC)	Review parties' communications with mediator re: pending motions to compel	\$888.00	0.20		\$177.60											
09/23/2020	Guy Wallace (GBW)	preparation of argument re reply on motion for leave to amend to file 3AC	\$1,188.00	1.40		\$1,663.20											
09/23/2020	Travis Close (TCC)	Meeting with team to discuss reply to Def's opposition brief, depositions, other strategy	\$888.00	0.70		\$621.60			0.7	621.6							
09/23/2020	Travis Close (TCC)	Review/analyze Ds motion to strike schroyer testimony	\$888.00	0.40		\$355.20											

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions										
				Worked			General Hrs	Fees	CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees			
09/23/2020	Travis Close (TCC)	Begin drafting response to Def's motion to strike declaration of Schroyer (re: 26(a)(2))	\$888.00	1.60		\$1,420.80											
09/23/2020	Mark Johnson (MTJ)	com w/ GBW re reply iso mtn for leave to amend complaint and add parties, modify scheduling order and re petition for arbitration against Falkenberg	\$888.00	0.80		\$710.40							0.8		710.4		
09/23/2020	Mark Johnson (MTJ)	team call re discovery for class cert, including depositions of staff and managers, pending discovery motions and new discovery motions, assessment data format	\$888.00	0.70		\$621.60			0.7		621.6						
09/23/2020	Mark Johnson (MTJ)	download, save and review assessment data format exemplar, coms w/ BSU, CH, D Marks re same	\$888.00	0.20		\$177.60											
09/23/2020	Mark Johnson (MTJ)	download, review and circulate order transferring Falkenberg case to Judge Staton; email exchange w/ CJH re strategy for addressing petition, to compel arbitration, scope of responsive pleading	\$888.00	0.30		\$266.40			0.3		266.4						
09/23/2020	Mark Johnson (MTJ)	review and analyze email from discovery master re issues in dispute, order to meet and confer, timing of ruling	\$888.00	0.10		\$88.80											
09/23/2020	Guy Wallace (GBW)	legal research and analysis re cases cited in Defendants' opposition to P's motion for leave to amend	\$1,188.00	1.60		\$1,900.80											
09/23/2020	Guy Wallace (GBW)	com's with CJH; MTJ re D's arguments that P's challenge to D's arbitration agreement is a new theory, P's unduly delayed in finding a willing proposed class representative and in seeking leave to amend the Complaint re same	\$1,188.00	0.80		\$950.40											
09/24/2020	Travis Close (TCC)	Research cases where court conditioned class cert on finding of new plaintiff who satisfied typicality	\$888.00	1.40		\$1,243.20											
09/24/2020	Travis Close (TCC)	Research secondary sources on adequacy of plaintiffs and substitution	\$888.00	1.30		\$1,154.40											
09/24/2020	Travis Close (TCC)	Research secondary sources on typicality of plaintiffs and substitution	\$888.00	0.90		\$799.20											
09/24/2020	Travis Close (TCC)	Draft analysis of whether reps may be substituted at class cert to cure inadequacies	\$888.00	1.40		\$1,243.20											
09/24/2020	Guy Wallace (GBW)	review and analysis of decision in Tait re permitting P.'s opportunity to propose sufficient class representative	\$1,188.00	0.10		\$118.80											
09/24/2020	Guy Wallace (GBW)	com's with TCC re same	\$1,188.00	0.20		\$237.60											
09/24/2020	Mark Johnson (MTJ)	strategy call w/ BSU re pending discovery motions, meeting and conferring with defendants, additional discovery motion topics and strategy.	\$888.00	1.00		\$888.00											
09/24/2020	Guy Wallace (GBW)	analysis of whether P.'s should prepare declarations of Heredia; Falkenberg; Roby; Arora to support their reply re motion for leave to amend	\$1,188.00	0.40		\$475.20							0.6		712.8		
09/24/2020	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20		\$237.60											
09/24/2020	Mark Johnson (MTJ)	emails w/ D Marks and A Allyn re format of assessment data and date for producing same.	\$888.00	0.10		\$88.80											
09/24/2020	Mark Johnson (MTJ)	review and analyze ltr from OC re demands for further expert disclosures	\$888.00	0.20		\$177.60											
09/24/2020	Mark Johnson (MTJ)	call w/ GBW re declarations iso mtn to modify scheduling order and for leave to add parties.	\$888.00	0.30		\$266.40											

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				Travel		
				Worked			General	CC Confs	Falkenberg				
<u>Fees</u>						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
09/24/2020	Mark Johnson (MTJ)	review email from BSU re discovery issues and attached samples of communications with putative class member	\$888.00		0.20								
09/25/2020	Lourdes Castro (LEC)	calendar dates re M&C		450	0.10	\$45.00	0.1	\$45.00					
09/25/2020	Travis Close (TCC)	Further analysis on cases finding that a representative may be substituted for inadequacy/atypicality	\$888.00		1.60	\$1,420.80							
09/25/2020	Travis Close (TCC)	Legal research -- newberg on class actions -- on adequacy/typicality	\$888.00		0.80	\$710.40							
09/25/2020	Travis Close (TCC)	Email to GBW, MTJ re: findings from research on substituting a representative due to inadequacy concerns	\$888.00		0.50	\$444.00							
09/25/2020	Travis Close (TCC)	Review/analysis of communications shared by Rebekah Wells	\$888.00		0.40	\$355.20							
09/25/2020	Travis Close (TCC)	Research cases outside of the ninth circuit where court allowed inadequate reps to be substituted	\$888.00		0.50	\$444.00							
09/25/2020	Guy Wallace (GBW)	com's with CJH; MTJ re class cert reply; deposition schedule and deadline for class cert reply and inclusion of staffing analysis	\$1,188.00		0.80	\$950.40							
09/25/2020	Guy Wallace (GBW)	legal research and analysis re substitution of proposed class representatives at the class certification stage; potential declarations of Falkenberg; Arora; Roby re reply on motion for leave to amend	\$1,188.00		0.90	\$1,069.20				0.9	1,069.20		
09/25/2020	Mark Johnson (MTJ)	begin drafting response to petition to compel Falkenberg to arbitration	\$888.00		1.70	\$1,509.60				1.7	1,509.60		
09/26/2020	Mark Johnson (MTJ)	finish drafting response to petition to compel Falkenberg arbitration	\$888.00		1.30	\$1,154.40				2	1,776.00		
09/26/2020	Mark Johnson (MTJ)	research for same	\$888.00		0.50	\$444.00							
09/26/2020	Mark Johnson (MTJ)	com w/ GBW and CJH re same and incorporate changes from both.	\$888.00		0.20	\$177.60							
09/27/2020	Mark Johnson (MTJ)	email CJH, GBW, BSU re staregy for meet and confer w/ D's motion re putative class member communications	\$888.00		0.20	\$177.60							
09/27/2020	Mark Johnson (MTJ)	email to COC GBW, CJH, BSU re position for meet and confer on D mtn to compel putative classmember docs and coms	\$888.00		0.10	\$88.80							
09/28/2020	Lourdes Castro (LEC)	Finalizing and Filing Respondent Peter Falkenberg's Response to Petition to Compel Arbitration		450	1.30	\$585.00				1.3	585		
09/28/2020	Lourdes Castro (LEC)	drafting POS		450	0.70	\$315.00	0.7	#REF!					
09/28/2020	Travis Close (TCC)	Research cases where court allowed substitution of plaintiff on adequacy concerns at class certification (1st-3rd circuits)	\$888.00		1.40	\$1,243.20							
09/28/2020	Travis Close (TCC)	Review/analyze MTJ's draft reply letters & response to Sunrise's demand for arbitration for plaintiff falkeberg	\$888.00		0.40	\$355.20							
09/28/2020	Travis Close (TCC)	Research cases where court allowed substitution of plaintiff on adequacy concerns at class certification (4-5th circuits)	\$888.00		1.60	\$1,420.80							
09/28/2020	Travis Close (TCC)	Research cases where court allowed substitution of plaintiff on adequacy concerns at class certification (6-8th circuits)	\$888.00		1.60	\$1,420.80							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions										
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees			
09/28/2020	Travis Close (TCC)	Email to GBW re: findings on substitution for adequate plaintiff at class cert	\$888.00	0.30		\$266.40											
09/28/2020	Mark Johnson (MTJ)	meet and confer w/ OC Gorman and Allyny and COC Umpierre re pending motions.	\$888.00	0.80		\$710.40											
09/28/2020	Mark Johnson (MTJ)	follow up call w/ BSU re stragy / deciison on exchange of putative class member communcations.	\$888.00	0.30		\$266.40											
09/28/2020	Mark Johnson (MTJ)	team call (CJH, BSU, GBW, DM, others) re possible extension of class cert schedule, assessment data, personal service plan data, deposition schedule, pending motions to compel	\$888.00	1.20		\$1,065.60			1.2		1,065.60						
09/28/2020	Mark Johnson (MTJ)	prep for meet and confer call w/ OC re pending discovery motions	\$888.00	0.50		\$444.00											
09/28/2020	Mark Johnson (MTJ)	finalize response to arbitration petition	\$888.00	0.10		\$88.80											
09/28/2020	Mark Johnson (MTJ)	coms w/ staff re same	\$888.00	0.20		\$177.60											
09/28/2020	Mark Johnson (MTJ)	emails w/ links from COC re declarant docs	\$888.00	0.10		\$88.80											
09/28/2020	Mark Johnson (MTJ)	emails to staff re processing same	\$888.00	0.10		\$88.80											
09/28/2020	Guy Wallace (GBW)	tc with CJH; Marka; BU; MTJ re class cert reply, schedule re same, staffing analysis	\$1,188.00	1.30		\$1,544.40											
9/29/2020	Lourdes Castro (LEC)	downloading documents to save in witness files	450	0.60		\$270.00			0.6		\$270.00						
09/29/2020	Guy Wallace (GBW)	legal research and analysis re substitution of new class representatives if other requirements for class cert are met; Manual on Complex Litigation; Newberg on Class Actions	\$1,188.00	0.50		\$594.00											
09/29/2020	Travis Close (TCC)	Analysis of expert disclosure requirements at time of class cert under Rule 26/parties' stipulation	\$888.00	1.60		\$1,420.80											
09/29/2020	Mark Johnson (MTJ)	call w/ GBW re facts supportive of motion for modification of schedule	\$888.00	0.20		\$177.60											
09/29/2020	Mark Johnson (MTJ)	email exchange re same listing points to be made in declarations	\$888.00	0.20		\$177.60											
09/30/2020	Lourdes Castro (LEC)	Checking/ updating/ adding itmes to Calendar and To Do in CM	450	1.10		\$495.00			1.1		\$495.00						
09/30/2020	Travis Close (TCC)	Review/analyze summary of call with OC re: stipulation for producing communications with class members	\$888.00	0.30		\$266.40											
09/30/2020	Travis Close (TCC)	Research response to Ds Mtn to Strike Schroyer -- treatment on expert production at class cert	\$888.00	1.30		\$1,154.40											
09/30/2020	Travis Close (TCC)	Analyze prior communications re: purported inadequacies with expert disclosures under rule 26	\$888.00	0.50		\$444.00											
09/30/2020	Guy Wallace (GBW)	analysis of substance of potential declarations from Falkenberg; Arora; Roby re reply declarations	\$1,188.00	0.60		\$712.80							0.6		712.80		
09/30/2020	Guy Wallace (GBW)	com's with BU; MTJ re same	\$1,188.00	0.50		\$594.00											
09/30/2020	Travis Close (TCC)	Research cases in central circuit on rule 26 and expert diclosure at time of class cert	\$888.00	1.40		\$1,243.20											
09/30/2020	Guy Wallace (GBW)	com's with CJH; BU; MTJ re schedule on depositions and class cert reply	\$1,188.00	0.30		\$356.40											
09/30/2020	Guy Wallace (GBW)	preparation of argument and revised outline re reply brief re motion for leave to amend	\$1,188.00	1.30		\$1,544.40											

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
10/01/2020	Lourdes Castro (LEC)	Adding names to docketbird; preparing NOA for GBW for the Sunrise v.Falkenberg	450		1.60		\$720.00				
10/01/2020	Travis Close (TCC)	Research caselaw re: diligence requirements under 16(b)		\$888.00	1.50		\$1,332.00				
10/01/2020	Travis Close (TCC)	Research cases where plaintiff was found diligent under rule 16(b) 4-6 months after discovery of new information		\$888.00	1.70		\$1,509.60				
10/01/2020	Travis Close (TCC)	Research cases where plaintiff was found diligent under rule 16(b) 4-6 months after discovery of new information (outside of ninth circuit)		\$888.00	0.70		\$621.60				
10/01/2020	Guy Wallace (GBW)	com's with BU; Yarnall re P's efforts to find new class representatives		\$1,188.00	0.90		\$1,069.20				
10/01/2020	Guy Wallace (GBW)	com's with MTJ re reply brief re motion for leave to amend		\$1,188.00	0.40		\$475.20				
10/01/2020	Guy Wallace (GBW)	review and analysis of D's opposition to P.'s motion for leave to amend		\$1,188.00	2.20		\$2,613.60				
10/01/2020	Guy Wallace (GBW)	revise and edit reply arguments and points		\$1,188.00	0.50		\$594.00				
10/01/2020	Mark Johnson (MTJ)	call w/ GBW re facts and strategy for reply iso mtn to modify scheduling order and for leave to amend		\$888.00	0.60		\$532.80				
10/01/2020	Guy Wallace (GBW)	preparation and drafting of P's reply brief re motion for leave to amend		\$1,188.00	2.30		\$2,732.40				
10/01/2020	Guy Wallace (GBW)	review and analysis of California cases permitting substitution of proposed class representatives at the class certification stage		\$1,188.00	1.00		\$1,188.00				
10/02/2020	Lourdes Castro (LEC)	Checking docketbird to add/ remove/ double check we have dates calendared in CM	450		0.50		\$225.00	0.5	\$225.00		
10/02/2020	Travis Close (TCC)	Analyze cases where court found diligence in moving to amend after discovery of new facts		\$888.00	0.90		\$799.20				
10/02/2020	Guy Wallace (GBW)	preparation and drafting of reply brief re motion for leave to amend		\$1,188.00	6.10		\$7,246.80				
10/03/2020	Guy Wallace (GBW)	preparation and drafting of reply brief re motion for leave to amend		\$1,188.00	0.90		\$1,069.20				
10/03/2020	Guy Wallace (GBW)	preparation and drafting of reply brief re motion for leave to amend		\$1,188.00	2.60		\$3,088.80				
10/04/2020	Mark Johnson (MTJ)	review and edit multi-issue draft joint stipulation with points and authorities is mtn to compel document production.		\$888.00	2.00		\$1,776.00				
10/04/2020	Guy Wallace (GBW)	preparation and drafting of reply re motion for leave to amend		\$1,188.00	6.40		\$7,603.20				
10/05/2020	Lourdes Castro (LEC)	calendar hearing for team	450		0.10		\$45.00	0.1	\$45.00		
10/05/2020	Mark Johnson (MTJ)	calls (x3) to talk through arguments on motion to extend deadline for amending pleadings and motion to add plaintiffs; falkenberg issues; potential timing and sequence of events		\$888.00	0.70		\$621.60			0.7	621.6
10/05/2020	Mark Johnson (MTJ)	calls w/ D Marks re tentative ruling on mtn to compel PSI data and technical aspects of pdf v database format		\$888.00	0.30		\$266.40				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
10/05/2020	Mark Johnson (MTJ)	call & gtm screen view w/ D Marks and Jim Thorton to review assessment v ISP data and discuss issues for discovery	\$888.00	1.40		\$1,243.20									
10/05/2020	Mark Johnson (MTJ)	heraring on production of ISP data													
10/05/2020	Mark Johnson (MTJ)	call w C Healey re argument and points to be made on mtn to compel ISP data.	\$888.00	0.40		\$355.20									
10/05/2020	Mark Johnson (MTJ)	initial review and analysis of tentative ruling on mtn to compel assessment data and mtn to compel putative class communications	\$888.00	0.30		\$266.40									
10/05/2020	Guy Wallace (GBW)	preparation and drafting of reply brief re motion for leave to amend	\$1,188.00	4.00		\$4,752.00									
10/05/2020	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.40		\$475.20									
10/06/2020	Ryan Bonner (RAB)	Phone call with JND re: new Production w/ txt. files being converted to xls. files and hosting and Relativity	900	0.20		\$180.00	0.2	\$180.00							
10/06/2020	Ryan Bonner (RAB)	Email to MTJ and co-counsel re: preserving metadata from Defendant's recent .txt document production	900	0.20		\$180.00	0.2	\$180.00							
10/06/2020	Guy Wallace (GBW)	preparation and drafting of reply brief re motion for leave to amend; argument re substitution of class representatives, P's do not conceded atypicality and inadequacy of Ganz and Fearn	\$1,188.00	4.40		\$5,227.20									
10/06/2020	Travis Close (TCC)	Review/analyze draft Ps stip re: motion to compel ESI & dec of BMU	\$888.00	0.40		\$355.20									
10/06/2020	Guy Wallace (GBW)	preparation of reply brief re motion for leave to amend; sections re diligence, prejudice and P's motion is permissible under Rule 15	\$1,188.00	4.10		\$4,870.80									
10/06/2020	Guy Wallace (GBW)	preparation and drafting of P's reply brief re motion for leave to amend; argument that P's motion is permissible under Rule 15	\$1,188.00	2.20		\$2,613.60									
10/06/2020	Mark Johnson (MTJ)	prep for motion to compel hearing	\$888.00	2.00		\$1,776.00									
10/06/2020	Mark Johnson (MTJ)	motion to compel hearing (zoom) with Judge Guilford on IP data and absent class member coms	\$888.00	1.10		\$976.80									
10/06/2020	Mark Johnson (MTJ)	Review and analyze final report and recommendation from discovery master on MTC	\$888.00	0.30		\$266.40									
10/06/2020	Mark Johnson (MTJ)	Draft email memo to COC re discovery master ruling on ISP, startegy re response, implication for staffing analysis and issues re data	\$888.00	0.40		\$355.20									
10/06/2020	Mark Johnson (MTJ)	coms w/ OC AA re data production and proposed extension for reply deadline	\$888.00	0.10		\$88.80									
10/06/2020	Mark Johnson (MTJ)	coms	\$888.00	0.10		\$88.80	0.1	\$88.80							
10/07/2020	Lourdes Castro (LEC)	calendar dates	450	0.20		\$90.00	0.2	\$90.00							
10/07/2020	Guy Wallace (GBW)	preparation and drafting of reply brief re motion for leave to amend	\$1,188.00	2.80		\$3,326.40									
10/07/2020	Guy Wallace (GBW)	review and analysis of D's opposition, drafting of section re Rule 15, introduction	\$1,188.00	1.00		\$1,188.00									
10/07/2020	Guy Wallace (GBW)	preparation and drafting of reply brief re motion for leave to amend	\$1,188.00	5.10		\$6,058.80									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
10/08/2020	Lourdes Castro (LEC)	searching for documents declarations for motion of class certification	450		0.40		\$180.00				
10/08/2020	Lourdes Castro (LEC)	reading order re REPORT AND RECOMMENDATION OF SPECIAL MASTER REGARDING DEFENDANT SUNRISE SENIOR LIVING, LLC'S MOTION TO COMPEL (DKT. 167) AND PLAINTIFFS' MOTION TO COMPEL (DKT. 169)	450		0.80		\$360.00	0.4	\$180.00		
10/08/2020	Mark Johnson (MTJ)	review and edit draft reply memo iso mtn for leave to amend complaint		\$888.00	1.30		\$1,154.40				
10/08/2020	Mark Johnson (MTJ)	coms w/ GBW re reply memo iso mtn for leave to amend complaint		\$888.00	0.30		\$266.40				
10/8/2020	Mark Johnson (MTJ)	review and respond to emails re production of expert docs prior to deposition		\$888.00	0.10		\$88.80				
10/08/2020	Travis Close (TCC)	Locate decs of Falkenberg, Arora, and Roby for GBW		\$888.00	0.30		\$266.40				
10/08/2020	Guy Wallace (GBW)	com's with MTJ re revisions to draft of reply brief re motion for leave to amend		\$1,188.00	0.50		\$594.00				
10/08/2020	Guy Wallace (GBW)	com's with MAY re Reply declaration re motion for leave to amend		\$1,188.00	0.40		\$475.20				
10/08/2020	Guy Wallace (GBW)	com's with BU re reply declaration re motion for leave to amend		\$1,188.00	0.40		\$475.20				
10/08/2020	Guy Wallace (GBW)	preparation and drafting of reply brief re motion for leave to amend		\$1,188.00	2.40		\$2,851.20				
10/08/2020	Guy Wallace (GBW)	review and analysis of cases cited in Defendants' opposition		\$1,188.00	2.00		\$2,376.00				
10/08/2020	Mark Johnson (MTJ)	calls (x5) w/ GBW re arguments on reply iso mtn for leave to amend to add class reps		\$888.00	0.90		\$799.20				
10/08/2020	Mark Johnson (MTJ)	review CJH proposed interrogatory re ISP data		\$888.00	0.10		\$88.80				
10/08/2020	Mark Johnson (MTJ)	draft response with proposed alternative language		\$888.00	0.10		\$88.80				
10/08/2020	Mark Johnson (MTJ)	review MAY and BSU declarations iso mtn for leave to amend complaint to add class reps and com w/ GBW re same.		\$888.00	0.50		\$444.00				
10/08/2020	Mark Johnson (MTJ)	coms w/ OC, BSU, GBW, CJH re proposed extension on class cert reply deadline, position and strategy re same		\$888.00	0.30		\$266.40				
10/08/2020	Mark Johnson (MTJ)	further call w/ GBW re reply iso mtn for leave to amend; declarations iso same and timing of events supporting diligence; documents		\$888.00	0.50		\$444.00				
10/08/2020	Guy Wallace (GBW)	review and analysis of reply declarations of Umpierre; Yarnall		\$1,188.00	1.70		\$2,019.60				
10/08/2020	Guy Wallace (GBW)	revise and edit same		\$1,188.00	0.50		\$594.00				
10/08/2020	Guy Wallace (GBW)	com's with BU and MAY re same (.3)		\$1,188.00	0.30		\$356.40				
10/08/2020	Guy Wallace (GBW)	preparation and drafting of sections addressing D's cases		\$1,188.00	3.80		\$4,514.40				
10/08/2020	Guy Wallace (GBW)	review and analysis of same		\$1,188.00	1.00		\$1,188.00				
10/08/2020	Guy Wallace (GBW)	com's with MTJ re same (.3)		\$1,188.00	0.30		\$356.40				
10/09/2020	Travis Close (TCC)	Caselaw reasearch - which types of fact variations are sufficient to/to not defeat typicality		\$888.00	0.90		\$799.20				
10/09/2020	Travis Close (TCC)	Caselaw research re: how much ignorance / lack of knoweldge is necessary to deafeat adequacy		\$888.00	0.60		\$532.80				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General Hrs	Fees	CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees	
10/09/2020	Travis Close (TCC)	Review/revise draft reply brief to motion to amend	\$888.00	1.20		\$1,065.60									
10/09/2020	Guy Wallace (GBW)	revise and edit P's reply papers re motion for leave to amend	\$1,188.00	3.80		\$4,514.40									
10/09/2020	Guy Wallace (GBW)	com's with CJH; MTJ; BU; MAY re same	\$1,188.00	0.80		\$950.40									
10/09/2020	Travis Close (TCC)	Review correspondence & stip re: extension of class cert reply brief	\$888.00	0.30		\$266.40									
10/09/2020	Guy Wallace (GBW)	revise and edit final draft of reply brief re motion for leave to amend	\$1,188.00	0.90		\$1,069.20									
10/09/2020	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.40		\$475.20									
10/09/2020	Mark Johnson (MTJ)	call w/ BSU to plan strategy for meet and confer w/ OC on 6 category motion to compel / joint stipulation	\$888.00	0.70		\$621.60									
10/09/2020	Mark Johnson (MTJ)	draft stipulation and declaration in support of stipulation to extend deadline for class cert reply.	\$888.00	2.80		\$2,486.40									
10/11/2020	Mark Johnson (MTJ)	revises draft stip to extend deadline for reply brief	\$888.00	0.20		\$177.60									
10/12/2020	Ryan Bonner (RAB)	Preparing production of Defendant Expert Documents SUNWARD002 for hosting on Relativity	900	0.20		\$180.00	0.2	\$180.00							
10/12/2020	Mark Johnson (MTJ)	finalize stip, proposed order and dec iso extending reply brief and draft email to OC re same	\$888.00	0.30		\$266.40									
10/12/2020	Mark Johnson (MTJ)	call w/ BSU, CJH re proposed/pending MTC, D's proposed resolution of some issues; response to same; categories of documents needed	\$888.00	0.70		\$621.60									
10/12/2020	Guy Wallace (GBW)	com's with CJH; MTJ re expert discovery and class certification	\$1,188.00	0.20		\$237.60									
10/13/2020	Ryan Bonner (RAB)	Email with Co-Counsel regarding how to access custodial metadata on Relativity	900	0.20		\$180.00	0.2	\$180.00							
10/14/2020	Lourdes Castro (LEC)	FILING REPORT AND RECOMMENDATION OF SPECIAL MASTER REGARDING DEFENDANT SUNRISE SENIOR LIVING, LLC'S MOTION TO COMPEL (DKT. 167) AND PLAINTIFFS' MOTION TO COMPEL (DKT. 169)	450	0.50		\$225.00	0.5	\$225.00							
10/14/2020	Lourdes Castro (LEC)	Communiation with ECF help desk re REPORT AND RECOMMENDATION OF SPECIAL MASTER REGARDING DEFENDANT SUNRISE SENIOR LIVING, LLC'S MOTION TO COMPEL (DKT. 167) AND PLAINTIFFS' MOTION TO COMPEL (DKT. 169) filing	450	0.10		\$45.00	0.1	\$45.00							
10/14/2020	Lourdes Castro (LEC)	communication with GBW and MTJ re REPORT AND RECOMMENDATION OF SPECIAL MASTER REGARDING DEFENDANT SUNRISE SENIOR LIVING, LLC'S MOTION TO COMPEL (DKT. 167) AND PLAINTIFFS' MOTION TO COMPEL (DKT. 169) filing	450	0.10		\$45.00	0.1	\$45.00							
10/14/2020	Lourdes Castro (LEC)	finalizing and filing stipulation Stipulation To Extend Briefing Deadline For Plaintiffs' Reply In Support Of Motion For Class Certification and related documents	450	1.70		\$765.00	1.7	\$765.00							
10/14/2020	Travis Close (TCC)	Review/analyze special master's order denying parties' motions to compel additional discovery	\$888.00	0.40		\$355.20									
10/14/2020	Travis Close (TCC)	Review/analyze Def's motion to compel arbitration for Falkenberg	\$888.00	0.40		\$355.20				0.4	355.2				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
10/14/2020	Mark Johnson (MTJ)	research cases and draft insert for opposition to mtn to strike Schroyer declawration	\$888.00	2.90							
10/14/2020	Mark Johnson (MTJ)	com w/ CJH re same	\$888.00	0.20							
10/15/2020	Lourdes Castro (LEC)	calendar hearing	450	0.10			0.1	\$45.00			
10/15/2020	Travis Close (TCC)	Review authority submitted re: rule 26 requiring expert disclosures before class cert	\$888.00	0.30							
10/15/2020	Mark Johnson (MTJ)	email w/ CJH re insert for opp to mtn to strike Schroyer declaration	\$888.00	0.30							
10/19/2020	Rachel Steyer (RLS)	email response to co-counsel re privilege logs	775	0.10			0.1	\$77.50			
10/19/2020	Travis Close (TCC)	Review Sunrise's answers to Ps RFPs re: jonathan walker, phds	\$888.00	0.30							
10/19/2020	Travis Close (TCC)	Review updated expert analysis on when target hours are above/below staff levels	\$888.00	0.30							
10/21/2020	Travis Close (TCC)	Review M/C litigation history in BMU's dec iso motion to compel additional discovery	\$888.00	0.30							
10/21/2020	Travis Close (TCC)	Analyze interoffice memo by co-counsel with marketing statements by Sunrise (depo prep)	\$888.00	0.40							
10/21/2020	Travis Close (TCC)	Review/analyze Ps motion to compel further discovery	\$888.00	0.70							
10/23/2020	Ryan Bonner (RAB)	Preparing Defendant's Expert Document for Hosting Relativity	900	0.20			0.2	\$180.00			
10/26/2020	Rachel Steyer (RLS)	email to MTJ and TCC re accessing documents	775	0.10			0.1	\$77.50			
10/26/2020	Rachel Steyer (RLS)	downloading and organizing files	775	0.30			0.3	\$232.50			
10/26/2020	Travis Close (TCC)	email to GBW re: finding supporting declaration iso Ds' opposition to Ps motion for class cert	\$888.00	0.20							
10/27/2020	Travis Close (TCC)	Analyze summary of Crandell depo by co-counsel	\$888.00	0.30							
10/28/2020	Jennifer Perez (JAP)	Re Sunrise v Falkenberg (related case): Comm's with BNC and LEC re mail processing procedure. Comm's with LEC re updates to ECF following.	500	0.20			0.2	\$100.00			
10/29/2020	Guy Wallace (GBW)	review and analysis of declaration of Dr. Walker	\$1,188.00	0.80							
10/29/2020	Guy Wallace (GBW)	preparation of questions for same	\$1,188.00	1.00							
10/29/2020	Guy Wallace (GBW)	com's with CJH re same (.3)	\$1,188.00	0.30							
11/05/2020	Travis Close (TCC)	Review and analyze D's memo in opposition to Ps' motion to compel further discovery	\$888.00	0.40							
11/05/2020	Travis Close (TCC)	Review Ps' supplemental memo iso motion to compel further discovery	\$888.00	0.20							
11/05/2020	Travis Close (TCC)	Review summary of parties' 10/30 meet and confer re: Ps motion to compel discovery	\$888.00	0.20							
11/05/2020	Guy Wallace (GBW)	review and analysis of supplemental discovery briefs for J. Guilford	\$1,188.00	0.90							
11/07/2020	Guy Wallace (GBW)	legal research and analysis re presumption that a party to a contract has read its terms	\$1,188.00	1.10							
11/07/2020	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20							
11/09/2020	Ryan Bonner (RAB)	Preparing production SUN036 set up for hosting on Relativity	900	0.30			0.3	\$270.00			
11/09/2020	Guy Wallace (GBW)	com's with CJH re preparation of reply papers re class certification	\$1,188.00	0.60							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions					
				Worked			General	CC Confs	Falkenberg	Travel		
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees
11/09/2020	Guy Wallace (GBW)	review and analysis of tentative decision from J. Guilford re discovery disputes	\$1,188.00	0.40		\$475.20						
11/09/2020	Guy Wallace (GBW)	preparation for hearing re same	\$1,188.00	0.50		\$594.00						
11/09/2020	Guy Wallace (GBW)	com's with BU; TBS re same	\$1,188.00	0.20		\$237.60						
11/10/2020	Ryan Bonner (RAB)	Email to GBW and co-counsel regarding Defendant's production now hosted on Relativity	900	0.10		\$90.00	0.1	\$90.00				
11/10/2020	Guy Wallace (GBW)	com's with BU re preparation for 11/11/20 discovery hearing with J. Guilford	\$1,188.00	0.80		\$950.40						
11/10/2020	Guy Wallace (GBW)	com's with CJH re preparation for Nov. 11 hearing with J. Guilford re discovery issues	\$1,188.00	0.40		\$475.20						
11/10/2020	Guy Wallace (GBW)	review and analysis of parties' submissions re Nov. 11 discovery hearing with J. Guilford	\$1,188.00	3.40		\$4,039.20						
11/10/2020	Guy Wallace (GBW)	preparation of notes for hearing with J. Guilford re discovery issues	\$1,188.00	2.30		\$2,732.40						
11/10/2020	Guy Wallace (GBW)	review and analysis of J. Guilford's tentative decision re parties' discovery disputes	\$1,188.00	0.90		\$1,069.20						
11/11/2020	Guy Wallace (GBW)	preparation of notes and arguments for discovery hearing with Judge Guilford	\$1,188.00	2.10		\$2,494.80						
11/11/2020	Travis Close (TCC)	Analyze missing assessment data in attachment from BMU email to O/C	\$888.00	0.30		\$266.40						
11/11/2020	Guy Wallace (GBW)	com's with BU re preparation for discovery hearing with J. Guilford, Maryott, Gorman	\$1,188.00	0.60		\$712.80						
11/11/2020	Guy Wallace (GBW)	discovery hearing with J. Guilford, Maryott, Gorman, BU	\$1,188.00	1.00		\$1,188.00						
11/11/2020	Guy Wallace (GBW)	analysis of results of hearing with J. Guilford	\$1,188.00	0.50		\$594.00						
11/11/2020	Guy Wallace (GBW)	com's with CJH; BU re same	\$1,188.00	0.20		\$237.60						
11/12/2020	Elana Ummel (EMU)	Cost Report	250	0.80		\$200.00	0.8	\$200.00				
11/12/2020	Guy Wallace (GBW)	review and analysis of evidentiary showing by the parties in the class cert briefing, including the draft class cert reply brief	\$1,188.00	0.80		\$950.40						
11/12/2020	Guy Wallace (GBW)	tc with Holocek; Henderson; BU re Falkenberg and joint submission re Scheduling Conference	\$1,188.00	0.30		\$356.40				0.3	356.4	
11/12/2020	Guy Wallace (GBW)	preparation for meet and confer with Holocek re Falkenberg and Court's Order of 9/28/20 re same	\$1,188.00	0.50		\$594.00				0.7	831.6	
11/12/2020	Guy Wallace (GBW)	com's with CJH; BU re same	\$1,188.00	0.20		\$237.60						
11/12/2020	Guy Wallace (GBW)	review and analysis of discovery ruling from Judge Guilford	\$1,188.00	0.40		\$475.20						
11/12/2020	Guy Wallace (GBW)	com's with BU re same	\$1,188.00	0.20		\$237.60						
11/12/2020	Guy Wallace (GBW)	review and analysis of D's class cert opposition and P's initial draft of reply brief	\$1,188.00	4.40		\$5,227.20						
11/13/2020	Guy Wallace (GBW)	review and analysis of D's class certification opposition & analysis of P's draft reply re same and arguments and points therein	\$1,188.00	2.80		\$3,326.40						
11/13/2020	Guy Wallace (GBW)	tc with CJH re draft class cert reply brief	\$1,188.00	0.90		\$1,069.20						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General		CC Confs		Falkenberg		Travel	
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
11/13/2020	Guy Wallace (GBW)	legal research and analysis re issue of whether must prove the merits of their claims to show commonality or predominance, or whether it is P's burden instead to show that a common method of proof is available	\$1,188.00	1.10		\$1,306.80								
11/13/2020	Travis Close (TCC)	Review/analyze of judge's order granting in part Ps' motion to compel	\$888.00	0.30		\$266.40								
11/16/2020	Mark Johnson (MTJ)	call with GBW re class cert opposition arguments and arguments on reply	\$888.00	0.70		\$621.60								
11/16/2020	Guy Wallace (GBW)	review and analysis of D's opposition to motion for class certification and P's draft reply brief re same	\$1,188.00	6.40		\$7,603.20								
11/17/2020	Guy Wallace (GBW)	review and analysis of D's opposition to class certification and P's draft class cert reply brief re same	\$1,188.00	5.80		\$6,890.40								
11/18/2020	Guy Wallace (GBW)	revise and edit class cert reply brief	\$1,188.00	6.80		\$8,078.40								
11/18/2020	Guy Wallace (GBW)	prepare for and participate in tc with Marks; CJH re class cert reply and testimony of Flores and Kennedy re same	\$1,188.00	1.60		\$1,900.80								
11/18/2020	Guy Wallace (GBW)	revise and edit draft of joint statement re Falkenberg; com's with CJH; BU; MTJ re same	\$1,188.00	0.70		\$831.60					0.7	831.6		
11/18/2020	Guy Wallace (GBW)	preparation of redline of draft reply brief re class certification	\$1,188.00	3.80		\$4,514.40								
11/19/2020	Travis Close (TCC)	Locate reply brief in support of motion to amend for GBW	\$888.00	0.20		\$177.60								
11/19/2020	Travis Close (TCC)	Review/analyze GBW's edits to draft reply brief iso class cert	\$888.00	1.40		\$1,243.20								
11/19/2020	Guy Wallace (GBW)	revise and edit reply brief re class certification	\$1,188.00	2.50		\$2,970.00								
11/19/2020	Guy Wallace (GBW)	com's with CJH; MTJ re same	\$1,188.00	0.40		\$475.20								
11/19/2020	Guy Wallace (GBW)	revise and edit draft joint statement re Falkenberg	\$1,188.00	0.20		\$237.60					0.4	475.2		
11/19/2020	Guy Wallace (GBW)	com's with BU; MTJ; opposing counsel re same	\$1,188.00	0.20		\$237.60								
11/20/2020	Guy Wallace (GBW)	review and analysis of further draft sections from Marks re class cert reply	\$1,188.00	1.20		\$1,425.60								
11/20/2020	Guy Wallace (GBW)	review and analysis of Ninth Circuit decision in Castillo v. Bank of America re commonality and predominance	\$1,188.00	0.60		\$712.80								
11/20/2020	Guy Wallace (GBW)	review and analysis of further potential points re class cert reply	\$1,188.00	2.40		\$2,851.20								
11/20/2020	Travis Close (TCC)	Email to BMU re: coordinating on work for reply brief	\$888.00	0.20		\$177.60								
11/20/2020	Travis Close (TCC)	Search & index docs hitting on "schedule attainment"	\$888.00	1.70		\$1,509.60								
11/20/2020	Travis Close (TCC)	Review/analysis of docs showing "scheduling to target - 10%" (assign w/5 target w/5 hours)	\$888.00	1.10		\$976.80								
11/20/2020	Travis Close (TCC)	Call with BMU re: filling in factual sites in reply brief	\$888.00	0.80		\$710.40								
11/20/2020	Guy Wallace (GBW)	review and analysis of further draft of class cert reply brief; response to D's objections to evidence re Ganz and Yarnall declarations	\$1,188.00	1.40		\$1,663.20								
11/20/2020	Guy Wallace (GBW)	com's with CJH; Marks; BU; MTJ; TCC re preparation of class cert reply	\$1,188.00	0.90		\$1,069.20								
11/20/2020	Guy Wallace (GBW)	revise and edit further draft of class cert reply brief	\$1,188.00	3.20		\$3,801.60								
11/21/2020	Guy Wallace (GBW)	revise and edit class cert reply brief	\$1,188.00	3.30		\$3,920.40								
11/21/2020	Guy Wallace (GBW)	com's with CJH; BU; MTJ; TCC re same	\$1,188.00	0.40		\$475.20								
11/21/2020	Guy Wallace (GBW)	review and analysis of further declaration of Dr. Kennedy	\$1,188.00	1.10		\$1,306.80								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions									
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees		
<u>Fees</u>							Hrs		Hrs		Hrs		Hrs		Hrs	
11/21/2020	Guy Wallace (GBW)	revise and edit same	\$1,188.00	1.00		\$1,188.00										
11/21/2020	Guy Wallace (GBW)	com's with CJH re same (.2)	\$1,188.00	0.20		\$237.60										
11/22/2020	Guy Wallace (GBW)	review and analysis of further draft of reply brief re class certification and MTJ proposed edits re same	\$1,188.00	0.90		\$1,069.20										
11/22/2020	Guy Wallace (GBW)	review and analysis of D's objections to evidence; P's draft reply re same	\$1,188.00	0.90		\$1,069.20										
11/22/2020	Guy Wallace (GBW)	legal research and analysis re evidentiary standards at the class certification stage	\$1,188.00	0.90		\$1,069.20										
11/22/2020	Guy Wallace (GBW)	revise and edit P's draft response to D's objections to certain parts of Declarations of Ganz and Yarnall	\$1,188.00	2.40		\$2,851.20										
11/22/2020	Travis Close (TCC)	Email to BMU re: progress on citation corrects in reply brief iso class cert	\$888.00	0.20		\$177.60										
11/23/2020	Guy Wallace (GBW)	revise and edit draft of P's response to D's objections to evidence submitted in support of class certification	\$1,188.00	3.30		\$3,920.40										
11/23/2020	Travis Close (TCC)	Analysis of docs for "schedule attainment" and 10% variance limit before 2019	\$888.00	2.30		\$2,042.40										
11/23/2020	Travis Close (TCC)	Email to CJH, team re: findings from schedule attainment analysis	\$888.00	0.20		\$177.60										
11/23/2020	Mark Johnson (MTJ)	com w/ GBW re Flores reply dec	\$888.00	0.20		\$177.60										
11/23/2020	Mark Johnson (MTJ)	review and edit draft Flores reply declaration	\$888.00	0.70		\$621.60										
11/23/2020	Mark Johnson (MTJ)	com w/ B Umpierre re timing of production of assessment data	\$888.00	0.10		\$88.80										
11/23/2020	Mark Johnson (MTJ)	research re same	\$888.00	0.10		\$88.80										
11/23/2020	Guy Wallace (GBW)	review and analysis of further draft of Flores Declaration	\$1,188.00	1.20		\$1,425.60										
11/23/2020	Guy Wallace (GBW)	com's with Marks; Thornton; CJH re same (.3)	\$1,188.00	0.30		\$356.40										
11/23/2020	Guy Wallace (GBW)	com's with CJH; BU; MTJ re further draft of class cert reply brief and supporting declarations	\$1,188.00	0.60		\$712.80										
11/23/2020	Guy Wallace (GBW)	review and analysis of further draft of class cert reply declaration of Dr. Kennedy	\$1,188.00	0.70		\$831.60										
11/23/2020	Guy Wallace (GBW)	review and analysis of section of Operations Manager re compliance with corporate staffing targets	\$1,188.00	0.20		\$237.60										
11/23/2020	Guy Wallace (GBW)	com's with CJH; BU; TCC re same	\$1,188.00	0.20		\$237.60										
11/24/2020	Guy Wallace (GBW)	review and analysis of Declaration of Dr. Kennedy	\$1,188.00	0.50		\$594.00										
11/24/2020	Travis Close (TCC)	Email to BMU re: updates on final draft of brief	\$888.00	0.20		\$177.60										
11/24/2020	Travis Close (TCC)	Email to BMU re: citation for amended statement in reply brief	\$888.00	0.20		\$177.60										
11/25/2020	Guy Wallace (GBW)	review and analysis of class cert reply brief; response to D's objections to evidence; Kennedy and Flores declarations	\$1,188.00	0.90		\$1,069.20										
11/25/2020	Travis Close (TCC)	Review/analysis of final filed version of reply brief iso class cert	\$888.00	0.60		\$532.80										
11/30/2020	Lourdes Castro (LEC)	calendar dates for the Sunrise v. Flakenberg matter	450	0.30		\$135.00	0.3									
11/30/2020	Mark Johnson (MTJ)	coms w/ COC re timing and coverage of scheduling conference	\$888.00	0.10		\$88.80										
12/01/2020	Travis Close (TCC)	Review/analyze letter by stebner firm to Defs re: search terms M/C	\$888.00	0.20		\$177.60										

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
12/02/2020	Mark Johnson (MTJ)	review and edit / comment on mediation brief	\$888.00		1.40		\$1,243.20				
12/02/2020	Guy Wallace (GBW)	review and analysis of drafts of mediation brief	\$1,188.00		1.90		\$2,257.20				
12/02/2020	Guy Wallace (GBW)	revise and edit same	\$1,188.00		1.00		\$1,188.00				
12/02/2020	Guy Wallace (GBW)	com's with CJH; MTJ re same	\$1,188.00		0.40		\$475.20				
12/02/2020	Travis Close (TCC)	Review and revisions to plaintiffs' mediation brief	\$888.00		1.30		\$1,154.40				
12/03/2020	Travis Close (TCC)	Review final edits to Ps mediation brief	\$888.00		0.50		\$444.00				
12/07/2020	Mark Johnson (MTJ)	com w GBW re proposed communication re settlement position to mediator; settlement strategy	\$888.00		0.40		\$355.20				
12/07/2020	Mark Johnson (MTJ)	review COC ltr to OC re demand for clawback of privileged doc	\$888.00		0.10		\$88.80				
12/07/2020	Guy Wallace (GBW)	com's with CJH; KAS; DTM; MTS; MTJ re mediation and preparation re same (.6)	\$1,188.00		0.60		\$712.80				
12/08/2020	Guy Wallace (GBW)	preparation of short summary of P's argument re class certification for 12/9 mediation	\$1,188.00		2.10		\$2,494.80				
12/08/2020	Guy Wallace (GBW)	com's with BU re further deposition of Fearn	\$1,188.00		0.10		\$118.80				
12/09/2020	Guy Wallace (GBW)	prepare for and participate in mediation with mediator Rob Kaplan	\$1,188.00		6.50		\$7,722.00				
12/11/2020	Guy Wallace (GBW)	com's with MTJ re preliminary shortfall analysis prepared by Marks et al., implications of same	\$1,188.00		0.40		\$475.20				
12/14/2020	Travis Close (TCC)	Analyze letter from ashley allen to BMU re: search terms and task times production	\$888.00		0.20		\$177.60				
12/14/2020	Guy Wallace (GBW)	tc with KAS; BU; CJH; DTM; MT; MAY; MTJ re settlement; class certification; discovery and trial preparation	\$1,188.00		1.20		\$1,425.60				
12/14/2020	Mark Johnson (MTJ)	team meeting re status of pending discovery issues, strategy, assignments. - See agenda from CH email	\$888.00		1.50		\$1,332.00			1.5	1,332.00
12/15/2020	Kyle Bates (KGB)	Revisions to complaint, telecon w/TLM re same	725		0.70		\$507.50	0.7	\$507.50		
12/15/2020	Mark Johnson (MTJ)	email exchanges w/ BU, DM re meet and confer session w/ OC re additional assessment data, issue re same	\$888.00		0.10		\$88.80				
12/15/2020	Mark Johnson (MTJ)	review discovery referee recommendations and order of 12/11 and follow up correspondence and other materials for meet and confer session w/ OC	\$888.00		1.50		\$1,332.00				
12/15/2020	Mark Johnson (MTJ)	coms w/ BU re same.	\$888.00		0.10		\$88.80				
12/16/2020	Lourdes Castro (LEC)	Calendaring deadlines/dates for Heredia and Falkenberg	450		2.20		\$990.00	2.2	\$990.00		
12/16/2020	Mark Johnson (MTJ)	further review of discovery order and BU list of issues for meet and confer w/oc re budget variances, CLM software inspection	\$888.00		0.40		\$355.20				
12/16/2020	Mark Johnson (MTJ)	call w/ BU, JT and OC A Allyn and J Gorman re budget variance documents and CLM software	\$888.00		0.60		\$532.80				
12/16/2020	Mark Johnson (MTJ)	refine and finalize note of call w/ OC and send to BU	\$888.00		0.20		\$177.60				
12/16/2020	Guy Wallace (GBW)	legal research and analysis re Ramirez v. TransUnion and scope of grant of petition for writ of certiorari	\$1,188.00		0.50		\$594.00				
12/18/2020	Carolyn Cottrell (CMH)	call with KGB re status of case and file opening	1295		0.10		\$129.50	0.1	\$129.50		
12/22/2020	Vincent Yasay (VCY)	Review San Diego County Superior Court docket; Review file; Email to CHC, et al. Re: service of process as to Summons and Complaint.	450		0.30		\$135.00	0.3	\$135.00		
12/23/2020	Lourdes Castro (LEC)	locating and sending GBW Ps reply re Class cert doc	450		0.20		\$90.00	0.2	\$90.00		

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
12/23/2020	Mark Johnson (MTJ)	draft email to OC re proposed ltr to court re mtns and alternative language	\$888.00	0.20							
12/31/2020	Michelle Lim (MSL)	review ecf notifications frm 12/30/20	850	0.10	\$85.00	0.1	\$85.00				
01/04/2021	Travis Close (TCC)	Review/analyze TCB powerpoint re: Schroyer time studies and co-counsel's discussions of same	\$888.00	0.30	\$266.40						
01/07/2021	Mark Johnson (MTJ)	call w/ S Warren re issues and strategy for opposition to mtn to compel arbitration	\$888.00	0.60	\$532.80						
01/07/2021	Mark Johnson (MTJ)	review Gibson Dunn brief in other case for positions taken w/r/t compelling arbitration	\$888.00	1.00	\$888.00						
01/07/2021	Mark Johnson (MTJ)	review D's mtn to compel arbitration in Falkenberg case and earlier draft of opposition to compel arbitration from S Warren for call w/ COC	\$888.00	1.50	\$1,332.00			1.5	1,332.00		
01/08/2021	Mark Johnson (MTJ)	call w/ GBW, CH and S Warren re strategy on opposition to Falkenberg motion to compel arbitration and relationship to Sunrise pending motions.	\$888.00	1.00	\$888.00			1	888		
01/08/2021	Mark Johnson (MTJ)	rework draft discovery ltr to discovery referee	\$888.00	1.20	\$1,065.60						
01/08/2021	Mark Johnson (MTJ)	com w/ COC re same	\$888.00	0.20	\$177.60						
01/11/2021	Lourdes Castro (LEC)	locating and sending documents per GBW's request	\$450.00	0.20	\$90.00	0.2	\$90.00				
01/11/2021	Lourdes Castro (LEC)	searching for doc per GBW's request	\$450.00	0.30	\$135.00	0.3	\$135.00				
01/11/2021	Guy Wallace (GBW)	review and analysis of D's MTS Declaration of Schroyer	\$1,188.00	1.40	\$1,663.20						
01/11/2021	Guy Wallace (GBW)	revise and edit draft opposition to D's MTS Schroyer Declaration re class certification	\$1,188.00	1.70	\$2,019.60						
01/11/2021	Guy Wallace (GBW)	preparation of revised introduction to opposition to D's MTS Schroyer declaration	\$1,188.00	1.30	\$1,544.40						
01/11/2021	Guy Wallace (GBW)	review and analysis of P's SAC and allegations re prospective injunctive relief	\$1,188.00	0.90	\$1,069.20						
01/11/2021	Guy Wallace (GBW)	revise and edit draft opposition to D's motion for judgment on the pleadings	\$1,188.00	2.90	\$3,445.20						
01/11/2021	Guy Wallace (GBW)	com with CJH re same	\$1,188.00	0.10	\$118.80						
01/12/2021	Travis Close (TCC)	Revie/analyze edits by DM to reply iso Schroyer declaration and DES software	\$888.00	0.30	\$266.40						
01/12/2021	Guy Wallace (GBW)	revise and edit draft opposition to D's motion to strike Schroyer declaration	\$1,188.00	3.90	\$4,633.20						
01/12/2021	Guy Wallace (GBW)	revise and edit draft opposition to D's motion to strike Schroyer Declaration; preparation of redlined version	\$1,188.00	2.00	\$2,376.00						
01/12/2021	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20	\$237.60						
01/12/2021	Mark Johnson (MTJ)	review and edit proposed ADR report for court	\$888.00	0.70	\$621.60						
01/13/2021	Guy Wallace (GBW)	com's with CJH; DTM re revisions to opposition to strike Schroyer Declaration	\$1,188.00	0.50	\$594.00						
01/13/2021	Mark Johnson (MTJ)	meet and confer session w OC re CLM docs and data w/ Brian U	\$888.00	0.60	\$532.80						
01/13/2021	Mark Johnson (MTJ)	follow up call w/ BU re results of meet and confer session w OC, strategy going forward, priorities for production, data inspection	\$888.00	0.70	\$621.60						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions					
				Worked			General	CC Confs	Falkenberg	Travel		
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees
01/13/2021	Mark Johnson (MTJ)	prep for meet and confer w/ OC re CLM and task time related documents, SQL data, etc. - review prior correspondence and orders re same	\$888.00	0.70		\$621.60						
01/13/2021	Mark Johnson (MTJ)	review revised ADR status report and coms w/ CJH re same	\$888.00	0.20		\$177.60						
01/13/2021	Mark Johnson (MTJ)	email to OC	\$888.00	0.20		\$177.60						
01/14/2021	Ryan Bonner (RAB)	Downloading and preparing production SUNRISE40 for hosting on Relativity	\$900.00	0.50		\$450.00	0.5	\$450.00				
01/14/2021	Guy Wallace (GBW)	revise and edit P's opposition to motion to strike Schroyer declaration	\$1,188.00	2.20		\$2,613.60						
01/14/2021	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20		\$237.60						
01/15/2021	Ryan Bonner (RAB)	QCing expert document production and hosting on Relativity	\$900.00	0.60		\$540.00	0.6	\$540.00				
01/15/2021	Travis Close (TCC)	Review/analyze Ps opposition to Ds motion to dismiss Ps UCL claims	\$888.00	0.60		\$532.80						
01/19/2021	Travis Close (TCC)	Review/analyze minute order from judge directing parties to refile class certification docs	\$888.00	0.20		\$177.60						
01/19/2021	Mark Johnson (MTJ)	coms w/ OC and COC re proposed ADR status report, strategy on responding to Ds edits	\$888.00	0.30		\$266.40						
01/19/2021	Mark Johnson (MTJ)	coms w/ COC re analysis of court order re re-filing of class cert papers	\$888.00	0.20		\$177.60						
01/20/2021	Ryan Bonner (RAB)	Preparing outstanding expert documents to be uploaded to Relativity	\$900.00	0.60		\$540.00	0.6	\$540.00				
01/20/2021	Guy Wallace (GBW)	revise and edit draft opposition to MTS Flores Declaration	\$1,188.00	1.70		\$2,019.60						
01/21/2021	Lourdes Castro (LEC)	Locating pdf documents and sending them to Co-Cnsl	\$450.00	0.50		\$225.00	0.5	\$225.00				
01/21/2021	Lourdes Castro (LEC)	downloading docs filed	\$450.00	0.30		\$135.00	0.3	\$135.00				
01/21/2021	Travis Close (TCC)	Review/analyze filed versions of Ps Re-filed motion for class cert	\$888.00	0.90		\$799.20						
01/21/2021	Guy Wallace (GBW)	revise and edit draft opposition to motion to strike Flores declaration	\$1,188.00	1.70		\$2,019.60						
01/22/2021	Travis Close (TCC)	Review/analyze parties' joint ADR status report	\$888.00	0.20		\$177.60						
01/22/2021	Guy Wallace (GBW)	revise and edit draft opposition to D's MTS Flores Declaration	\$1,188.00	3.50		\$4,158.00						
01/22/2021	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.10		\$118.80						
01/22/2021	Guy Wallace (GBW)	revise and edit draft opposition to D's motion to strike declaration of Dr. Kennedy	\$1,188.00	2.70		\$3,207.60						
01/22/2021	Travis Close (TCC)	Review/analyze Def's reply iso motion to strike Dec of Schroyer	\$888.00	0.20		\$177.60						
01/22/2021	Guy Wallace (GBW)	review and analysis of D's proposed sur-reply re class certification	\$1,188.00	0.50		\$594.00						
01/22/2021	Guy Wallace (GBW)	com's with CJH; BU; MTJ re same	\$1,188.00	0.20		\$237.60						
01/23/2021	Guy Wallace (GBW)	review and analysis of D's motion to strike Kennedy Declaration ISO class certification	\$1,188.00	1.80		\$2,138.40						
01/23/2021	Guy Wallace (GBW)	revise and edit draft opposition to MTS Kennedy Declaration re class certification	\$1,188.00	3.30		\$3,920.40						
01/23/2021	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.30		\$356.40						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
01/23/2021	Guy Wallace (GBW)	review and analysis of D's proposed sur-reply	\$1,188.00	1.10							
01/23/2021	Guy Wallace (GBW)	com's with CJH; Marks; MTJ re same	\$1,188.00	0.40							
01/25/2021	Lourdes Castro (LEC)	Adding dates in calendar CM	\$450.00	0.20		0.2	\$90.00				
01/25/2021	Travis Close (TCC)	Review/analyze Ps' request for status conference & moving out dates	\$888.00	0.20							
01/25/2021	Travis Close (TCC)	Review/analyze Ds notice of errata re: application to file under seal	\$888.00	0.10							
01/26/2021	Guy Wallace (GBW)	revise and edit further draft of opposition to D's MTS Kennedy Declaration	\$1,188.00	0.90							
01/26/2021	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20							
01/26/2021	Guy Wallace (GBW)	preparation for hearing on motions for class certification; motion for leave to amend	\$1,188.00	0.70							
01/26/2021	Guy Wallace (GBW)	preparation of topics and questions for ED depositions; list of exhibits for same	\$1,188.00	1.80							
01/27/2021	Guy Wallace (GBW)	revise and edit further draft of opposition to D's MTS Flores Declaration	\$1,188.00	3.70							
01/27/2021	Travis Close (TCC)	Review, analyze & research cases cited in Def's notice of supplemental authority	\$888.00	0.80							
01/27/2021	Guy Wallace (GBW)	tc with CJH re preparation for hearing on MCC	\$1,188.00	0.90							
01/27/2021	Guy Wallace (GBW)	preparation for hearing on motion for leave to amend	\$1,188.00	0.20							
01/27/2021	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20							
01/27/2021	Guy Wallace (GBW)	analysis of approach at hearing to issue of the definition of the class & putative class members who may be subject to arbitration	\$1,188.00	0.30							
01/27/2021	Guy Wallace (GBW)	com's with CJH and MTJ re same	\$1,188.00	0.20							
01/27/2021	Guy Wallace (GBW)	legal research and analysis re whether there is a jury trial right re the enforceability of an arbitration agreement	\$1,188.00	0.40							
01/27/2021	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20							
01/27/2021	Guy Wallace (GBW)	review and analysis of D's opposition to class certification	\$1,188.00	0.60							
01/27/2021	Guy Wallace (GBW)	preparation of notes re same	\$1,188.00	0.60							
01/27/2021	Mark Johnson (MTJ)	com w/ /GBW re supplemental authority from Ds and class cert hearing	\$888.00	0.30							
01/28/2021	Lourdes Castro (LEC)	locating and sending docs to GBW per his request	\$450.00	0.50		0.5	\$225.00				
01/28/2021	Lourdes Castro (LEC)	drafting Notices of deposition	\$450.00	1.40		1.4	\$630.00				
01/28/2021	Lourdes Castro (LEC)	communication with GBW re Class cert hearing	\$450.00	0.10		0.1	\$45.00				
01/28/2021	Lourdes Castro (LEC)	extracting pages from brief per GBW's request	\$450.00	0.10		0.1	\$45.00				
01/28/2021	Guy Wallace (GBW)	review and analysis of motion for leave to amend; preparation of hearing re same	\$1,188.00	0.90							
01/28/2021	Guy Wallace (GBW)	com's with CJH; MTJ re same	\$1,188.00	0.40							
01/28/2021	Guy Wallace (GBW)	preparation of additional notes and talking points for class certification hearing; review and analysis of D's proposed sur-reply	\$1,188.00	4.80							
01/28/2021	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.40							
01/28/2021	Guy Wallace (GBW)	com's with CJH re preparation for hearing on motion for class certification	\$1,188.00	0.60							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
01/28/2021	Guy Wallace (GBW)	preparation of notes for hearing re motion for leave to amend	\$1,188.00	1.40							
01/28/2021	Guy Wallace (GBW)	com's with CJH; MTJ re same	\$1,188.00	0.30							
01/28/2021	Mark Johnson (MTJ)	calls x2 w. /GBW re prep for argument on motion to amend pleadings	\$888.00	0.20							
01/28/2021	Mark Johnson (MTJ)	review outline / notes of argument	\$888.00	0.10							
01/29/2021	Rachel Steyer (RLS)	listened in to hearing related to motion to amend and discussion regarding motion for class certification	\$775.00	0.70		0.7	\$542.50				
01/29/2021	Guy Wallace (GBW)	preparation for hearing re motion for leave to amend and notes re same	\$1,188.00	1.70							
01/29/2021	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.40							
01/29/2021	Travis Close (TCC)	Review/analyze Ps' file opposition to Ds' motion to strike Kennedy declaration	\$888.00	0.50							
01/29/2021	Mark Johnson (MTJ)	calls x2 w/ GBW re issues and strategy on argument mtn for leave to modify schedule and amend complaint	\$888.00	0.40							
01/29/2021	Mark Johnson (MTJ)	review pleading on mtn to amend scheldule and leave to amend complaint; review revied notes on argument from GBW	\$888.00	1.00							
01/29/2021	Mark Johnson (MTJ)	attend hearing on mtn for class cert and mtn to modify schedule and amend pleadiings	\$888.00	1.30							
01/29/2021	Mark Johnson (MTJ)	debriefing and strategy call w/ GBW and CJH following class cert hearing	\$888.00	0.50							
01/29/2021	Mark Johnson (MTJ)	further follow up straegy and analysis w/ GBW re class certificationm hearing	\$888.00	0.30							
01/29/2021	Guy Wallace (GBW)	com's with MTJ re preparation for hearing re class certification and motion for leave to amend	\$1,188.00	0.40							
01/29/2021	Guy Wallace (GBW)	hearing on motions for class certification and for leave to amend the Complaint	\$1,188.00	1.20							
01/29/2021	Guy Wallace (GBW)	com's with CJH; KAS; MTJ re results of hearing re class certification and for leave to amend	\$1,188.00	0.80							
01/29/2021	Guy Wallace (GBW)	analysis of same and next steps	\$1,188.00	0.30							
01/29/2021	Guy Wallace (GBW)	review and analysis of opening and opposition briefs re motion for leave to amend	\$1,188.00	0.90							
01/29/2021	Guy Wallace (GBW)	preparation for hearing and notes re same	\$1,188.00	0.90							
02/01/2021	Guy Wallace (GBW)	com's with CJH re class certification and hearing re same	\$1,188.00	0.50							
02/01/2021	Travis Close (TCC)	Download depo transcripts from co-counsel & organize	\$888.00	0.40							
02/02/2021	Mark Johnson (MTJ)	call w/ CJH, BU re strategy for pursuing remaining discovery, prioritizing issues, meet and confer demand	\$888.00	0.90							
02/02/2021	Mark Johnson (MTJ)	call w/ team (Healey, Thamer, GBW, BU, Stebner, others) re settlement position, response to inquires from OC through mediator, stateg and potential demand	\$888.00	1.00				1	888		
02/02/2021	Mark Johnson (MTJ)	call w/ GBW to follow up on settlement discussion, revised class cert definition	\$888.00	0.30							
02/02/2021	Mark Johnson (MTJ)	review and confer w/ BU re email to OC requesint meet and confer on assessment data, inspection of software system and depo dates	\$888.00	0.20							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
02/02/2021	Mark Johnson (MTJ)	review notes from CJH re propoed alternative class cert	\$888.00	0.50							
02/02/2021	Mark Johnson (MTJ)	draft revised class def	\$888.00	0.20							
02/02/2021	Mark Johnson (MTJ)	confer w/ GBW re same	\$888.00	0.20							
02/02/2021	Guy Wallace (GBW)	com's with KAS; CJH; MTJ re results of hearing on motion for class certification and developments re settlement discussions	\$1,188.00	0.70							
02/03/2021	Breanna Casella (BNC)	[Error]	\$250.00	0.10			0.1		\$25.00		
02/03/2021	Breanna Casella (BNC)	[Error]	\$250.00	0.10			0.1		\$25.00		
02/03/2021	Mark Johnson (MTJ)	review / research docket, pleadings for info re timeline for mjop opp	\$888.00	0.50							
02/03/2021	Mark Johnson (MTJ)	coms w/ CH re same	\$888.00	0.20							
02/04/2021	Ryan Bonner (RAB)	Email to Co-Counsel regarding hosting status of Third Party Productions and verifyfynh upload to Relativity	\$900.00	0.20			0.2		\$180.00		
02/04/2021	Mark Johnson (MTJ)	review email from BU and email from OC re meet and confer issues, D's position, scheduling call	\$888.00	0.10							
02/04/2021	Mark Johnson (MTJ)	respond re same	\$888.00	0.10							
02/04/2021	Travis Close (TCC)	Review/analyze court's order taking Ds motions under submission	\$888.00	0.10							
02/04/2021	Travis Close (TCC)	Review and anayze Sunrise's operating budget report for 2015 (Def Exh 35)	\$888.00	0.40							
02/04/2021	Travis Close (TCC)	Review proposed revised class definition by team and associated correspondance	\$888.00	0.40							
02/04/2021	Guy Wallace (GBW)	com's with CJH re D's motion for judgment on the pleadings and J. Staton minute order cancelling hearing	\$1,188.00	0.20							
02/04/2021	Guy Wallace (GBW)	com's with CJH; MTJ re potential revisions to proposed class definition	\$1,188.00	0.30							
02/04/2021	Mark Johnson (MTJ)	re-draft proposed class definition for class not subject to arbitration	\$888.00	0.30							
02/04/2021	Mark Johnson (MTJ)	call w/ GBW re same and explanatory cover email re same	\$888.00	0.20							
02/04/2021	Mark Johnson (MTJ)	coms w/ Stefanie Warren re call withFalkenber	\$888.00	0.10							
02/05/2021	Mark Johnson (MTJ)	call w/ BU to discuss status of TCM, CLM productions, SQL server database to prepare for meet and confer w/ OC re same	\$888.00	1.40							
02/05/2021	Mark Johnson (MTJ)	meet and confer w/ OC Gorman and Allyn re depos, task time data, materials related to taks time studies, CLM and TCB data and sql server	\$888.00	1.10							
02/08/2021	Mark Johnson (MTJ)	call w/ S Warren and C Healey re strategy for oppositon to motion to compel arbitration and for client communication.	\$888.00	0.50						0.5	444
02/08/2021	Travis Close (TCC)	Review/analyze Ds' reply brief iso mtn to strike flores dec	\$888.00	0.30							
02/08/2021	Travis Close (TCC)	Review/analyze Ds' reply iso mtn to strike Kennedy declaration	\$888.00	0.20							
02/08/2021	Travis Close (TCC)	Review/analyze BMU notes from M/C	\$888.00	0.10							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions						
				Worked			General	CC Confs	Falkenberg	Travel			
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	
02/09/2021	Mark Johnson (MTJ)	call w/ Peter and Linda Falkenberg w/ co-counsel S Warren re opposition to petition for arbitration, status of mtn to amend to add them to class action.	\$888.00	0.80		\$710.40				0.8	710.4		
02/09/2021	Travis Close (TCC)	Analyze Rutter Guide's guidance on noticing missing docs for deposition to get around 30 day rule	\$888.00	0.20		\$177.60							
02/09/2021	Guy Wallace (GBW)	review and analysis of Order from J. Staton re class certification	\$1,188.00	0.70		\$831.60							
02/09/2021	Guy Wallace (GBW)	com's with CJH; MTJ re same	\$1,188.00	0.20		\$237.60							
02/09/2021	Mark Johnson (MTJ)	follow-up call with CO Steph Warren re call w/ Falkenbergs and next steps	\$888.00	0.10		\$88.80				0.1	88.8		
02/09/2021	Mark Johnson (MTJ)	review and analysis of decision denying class cert w/o prejudice and denying mtn to modify scheduling order and for leave to amend complaint	\$888.00	0.40		\$355.20							
02/09/2021	Mark Johnson (MTJ)	calls w/ GBW (x3) re decision on class cert, leave to amend, strategy for renewed motion for narrower class, ramifications and strategy for Falkenberg petition to compel arbitration	\$888.00	0.90		\$799.20				0.9	799.2		
02/10/2021	Travis Close (TCC)	Review/analyze the Court's order on Def's motion for judgment on pleadings	\$888.00	0.40		\$355.20							
02/10/2021	Travis Close (TCC)	Review and analyze minutes re: def's motion to strike Kennedy declaration	\$888.00	0.10		\$88.80							
02/10/2021	Travis Close (TCC)	Review and analyze court order denying plf's motion for class cert without prejudice	\$888.00	0.20		\$177.60							
02/10/2021	Guy Wallace (GBW)	review and analysis of J. Staton's order re D's motion for judgment on the pleadings based on Sonner	\$1,188.00	0.60		\$712.80							
02/10/2021	Guy Wallace (GBW)	com's with MTJ re district court's decision re motion for judgment on the pleadings, preparation of further motion for class certification	\$1,188.00	0.50		\$594.00							
02/10/2021	Mark Johnson (MTJ)	review and analyze decision on mtn for judgment on the pleadings	\$888.00	0.50		\$444.00							
02/10/2021	Mark Johnson (MTJ)	call w/ GBW re ramifications of class cert denial and strategy going forward	\$888.00	0.10		\$88.80							
02/10/2021	Mark Johnson (MTJ)	call w/ GBW re analysis of decision on mtn for judgment on the pleadings, impact of same and strategy	\$888.00	0.30		\$266.40							
02/11/2021	Travis Close (TCC)	Review/analyze notes from David Marks re: potential trial witnesses	\$888.00	0.20		\$177.60							
02/11/2021	Guy Wallace (GBW)	com's with CJH; MTJ re preparation of motion for class certification re narrower class not subject to arbitration; discovery re scope and membership of same	\$1,188.00	0.50		\$594.00							
02/12/2021	Guy Wallace (GBW)	com's with CJH; SW; MTJ re revised proposed class definition and discovery re persons who have signed arbitration agreements with Sunrise	\$1,188.00	0.90		\$1,069.20							
02/12/2021	Guy Wallace (GBW)	legal research and analysis re class definitions that exclude persons who are potentially covered by enforceable arbitration agreements	\$1,188.00	1.30		\$1,544.40							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions					
				Worked			General	CC Confs	Falkenberg	Travel		
Fees							Hrs	Fees	Hrs	Fees	Hrs	Fees
02/12/2021	Mark Johnson (MTJ)	call w/ COC GBW, CJH, BU, SW re revised class definition and inclusion or exclusion of signed agreements by unauthorized persons; Falkenberg opp to mtn to compel arbitration	\$888.00	0.80		\$710.40					0.8	710.4
02/12/2021	Mark Johnson (MTJ)	call w/ NP from firm re experience w/ "not subject to arbitration" classes for designing class cert mtn	\$888.00	0.40		\$355.20						
02/12/2021	Mark Johnson (MTJ)	call w/ COC Warren and attempted call w/ Falkenberg	\$888.00	0.10		\$88.80					0.1	88.8
02/12/2021	Mark Johnson (MTJ)	follow up call w/ gbw re class cert definition, ramifications of broader definition	\$888.00	0.30		\$266.40						
02/13/2021	Guy Wallace (GBW)	tc with MTJ re proposed definition of class for renewed motion for class certification	\$1,188.00	0.30		\$356.40						
02/13/2021	Guy Wallace (GBW)	legal research and analysis re class definitions that exclude persons covered by arbitration agreements	\$1,188.00	1.40		\$1,663.20						
02/13/2021	Mark Johnson (MTJ)	call w/ GBW re strategy on class definition, scope of arbitration exclusion, results of research re same.	\$888.00	0.30		\$266.40						
02/16/2021	Mark Johnson (MTJ)	call w/ client Falkenberg and S Warren re results of motions and dismissal of mtn to compel	\$888.00	0.20		\$177.60					0.2	177.6
02/16/2021	Mark Johnson (MTJ)	follow up call w/ S Warren re call with Falkenbergs, use of declaration in class case	\$888.00	0.10		\$88.80					0.1	88.8
02/16/2021	Mark Johnson (MTJ)	email to OC re sitp for dismissal of petition to compel arbitration	\$888.00	0.10		\$88.80						
02/17/2021	Travis Close (TCC)	Review/analyze Ps' RFPs, Set 9	\$888.00	0.20		\$177.60						
02/17/2021	Travis Close (TCC)	Review/analyze Ps' (refiled) opposition to motion to strike expert declaration from Kennedy	\$888.00	0.30		\$266.40						
02/17/2021	Travis Close (TCC)	Call with LEC re: locating court reporter and service of process agent in Arizona jurisdiction	\$888.00	0.20		\$177.60						
02/18/2021	Lourdes Castro (LEC)	communication with TSG re zoom demo	\$450.00	0.20		\$90.00	0.2	\$90.00				
02/18/2021	Lourdes Castro (LEC)	communication with MTJ re TSG deposition zoom demo	\$450.00	0.10		\$45.00	0.1	\$45.00				
02/18/2021	Lourdes Castro (LEC)	researching re subpoena for a deposition in Tucson AZ, identify a reporting service	\$450.00	0.40		\$180.00	0.4	\$180.00				
02/18/2021	Travis Close (TCC)	Investigate possible court reporters for remote depo in AZ jurisdiction	\$888.00	0.40		\$355.20						
02/18/2021	Travis Close (TCC)	Call with LEC re: locating a court report and service of process agent for depo needed in Arizona	\$888.00	0.30		\$266.40						
02/18/2021	Guy Wallace (GBW)	com's with CJH re current status, revised motion for class certification, settlement	\$1,188.00	0.30		\$356.40						
02/18/2021	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20		\$237.60						
02/18/2021	Mark Johnson (MTJ)	email exchanges w. CJH, BU re watermark depo subpoena concerning task time guidelines	\$888.00	0.40		\$355.20						
02/18/2021	Mark Johnson (MTJ)	call and emails w/ staff re reporter and process server	\$888.00	0.20		\$177.60						
02/22/2021	Lourdes Castro (LEC)	Drafting POS re NODs and Subpoena of Watermark	\$450.00	0.50		\$225.00	0.5	\$225.00				
02/22/2021	Lourdes Castro (LEC)	communication with TCC re NOD and Subpoena	\$450.00	0.10		\$45.00	0.1	\$45.00				
02/22/2021	Lourdes Castro (LEC)	Checking the Client folder and public folder re serving Subpoenas	\$450.00	0.50		\$225.00	0.5	\$225.00				
02/22/2021	Lourdes Castro (LEC)	emailing TBS re serving subpoena	\$450.00	0.10		\$45.00	0.1	\$45.00				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
02/22/2021	Travis Close (TCC)	Review and analyze order dismissing action on stip to dismiss	\$888.00	0.10							
02/22/2021	Travis Close (TCC)	Review/analyze Ds' notice of recalling motion to compel arbitration for peter falkenberg	\$888.00	0.10				0.1		88.8	
02/22/2021	Travis Close (TCC)	Call with LEC re: how to serve subpoena to witness in Arizona	\$888.00	0.20							
02/22/2021	Mark Johnson (MTJ)	call w/ Brian U, James T and Drake re plan for virtual inspection of CLM system; counterproposal for protocols for same.	\$888.00	0.80							
02/23/2021	Lourdes Castro (LEC)	communication with TCC re correcting subpoena	\$450.00	0.10		0.1	\$45.00				
02/23/2021	Lourdes Castro (LEC)	correcting date in subpoena	\$450.00	0.20		0.2	\$90.00				
02/23/2021	Travis Close (TCC)	Call with MTJ re: finalizing depo subpoena for watermark (AZ)	\$888.00	0.40							
02/23/2021	Travis Close (TCC)	Email to MTJ re: coordinating service in depo to Watermark	\$888.00	0.20							
02/23/2021	Travis Close (TCC)	Email to Titan Legal Services with instructions on how to process subpoena	\$888.00	0.60							
02/23/2021	Travis Close (TCC)	Investigate agent for service of process/principal place of address for Watermark Retirement Communities	\$888.00	0.40							
02/23/2021	Travis Close (TCC)	Email to MTJ re: couple of issues with draft subpoena to Watermark	\$888.00	0.20							
02/23/2021	Travis Close (TCC)	Call with MTJ re: issues with deposition subpoena to be addressed	\$888.00	0.20							
02/23/2021	Travis Close (TCC)	Fix issues with deposition subpoena to watermark	\$888.00	0.40							
02/23/2021	Travis Close (TCC)	Call to LEC re: fixing issues with Watermarks deposition subpoena	\$888.00	0.20							
02/23/2021	Travis Close (TCC)	Email to Titan re: revised subpoena and cover letter for service	\$888.00	0.40							
02/23/2021	Travis Close (TCC)	Email to Trixie @ Titan legal re: revised subpoena attached to Watermark	\$888.00	0.20							
02/23/2021	Mark Johnson (MTJ)	review, revise depo notice and subpoena for watermark	\$888.00	0.40							
02/23/2021	Mark Johnson (MTJ)	calls/emails w/ TCC and process server rep re finalization and service os same	\$888.00	0.20							
02/23/2021	Mark Johnson (MTJ)	follow up coms w/ TCC re corrections	\$888.00	0.20							
02/24/2021	Travis Close (TCC)	Email to donald watanabe (@ Titan) re confirmation of receipt of subpoena for deposition (Watermark)	\$888.00	0.20							
02/25/2021	Lourdes Castro (LEC)	communication with TSG re schedule a court reporter for a deposition	\$450.00	0.30		0.3	\$135.00				
02/26/2021	Mark Johnson (MTJ)	call w/ CJH to discuss strategy for depo addressing authenticity and foundation of documents produced by defendants	\$888.00	0.30							
02/26/2021	Mark Johnson (MTJ)	review secondary sources re depositions of ESI custodians and addressing authenticity, foundation issues for docs produced	\$888.00	0.70							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions									
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees		
							Hrs		Hrs		Hrs		Hrs		Hrs	
02/26/2021	Mark Johnson (MTJ)	call w/ GBW re proposed class cert definition, possible ramifications for various choices, commonality related to ascertaining class members	\$888.00	0.30		\$266.40										
02/28/2021	Mark Johnson (MTJ)	research re authenticating docs through deposition, authentication of docs produced by opposing party, burden objections based on quantity of admissions or volume of documents to be authenticated	\$888.00	1.20		\$1,065.60										
02/28/2021	Mark Johnson (MTJ)	draft email re same for CJH with authorities and language for 30b6 depo topic	\$888.00	0.20		\$177.60										
03/01/2021	Mark Johnson (MTJ)	call w/ Healey, Marks, Thornton, Umpierre re Lacey depo, 30b6 depo, task times and task time studies, additional discovery / motion to comple required; /watermark depo or declaration	\$888.00	1.70		\$1,509.60										
03/02/2021	Mark Johnson (MTJ)	call w/ GBW re class cert motion strategy, definition of class re arbitration issue	\$888.00	0.30		\$266.40										
03/02/2021	Travis Close (TCC)	Analyze research by MTJ on topic of authenticity of document production for docs produced by Defendants	\$888.00	0.40		\$355.20										
03/02/2021	Mark Johnson (MTJ)	call w/ CJH, BU re strategy and timing for MC and MTC re outstanding discovery, depositions	\$888.00	1.00		\$888.00										
03/02/2021	Mark Johnson (MTJ)	call w/ Healey, Laura Sitar re watermark declaration / depo	\$888.00	0.30		\$266.40										
03/02/2021	Travis Close (TCC)	Analyze research by BMU on discovery motion timing	\$888.00	0.30		\$266.40										
03/02/2021	Travis Close (TCC)	Review and analyze draft second rule 30(b)(6) depo notice	\$888.00	0.30		\$266.40										
03/02/2021	Mark Johnson (MTJ)	revise language for proposed watermark stipulation re assessment guidelines	\$888.00	0.20		\$177.60										
03/02/2021	Mark Johnson (MTJ)	draft cover email to Watermark counsel re same	\$888.00	0.10		\$88.80										
03/02/2021	Mark Johnson (MTJ)	finalize 2nd notice of 30b6 depo	\$888.00	0.10		\$88.80										
03/02/2021	Mark Johnson (MTJ)	draft cover email, explanation to OC	\$888.00	0.10		\$88.80										
03/02/2021	Mark Johnson (MTJ)	confer w/ COC re same.	\$888.00	0.10		\$88.80										
03/03/2021	Rachel Steyer (RLS)	reading and reviewing orders pursuant to plaintiffs motion for class certification and leave to amend	\$775.00	1.20		\$930.00		1.2								\$930.00
03/04/2021	Lourdes Castro (LEC)	Communication with MTJ and TCC re deposition on 3-8-21	450	0.20		\$90.00		0.2								\$90.00
03/04/2021	Lourdes Castro (LEC)	Communication with TSG re 3-8-21 deposition	450	0.10		\$45.00		0.1								\$45.00
03/04/2021	Travis Close (TCC)	Call with LEC re court reporter setup for Watermark deposition	\$888.00	0.20		\$177.60										
03/04/2021	Travis Close (TCC)	Email to BMU re: court reported information for Watermark depo	\$888.00	0.20		\$177.60										
03/04/2021	Mark Johnson (MTJ)	call w/ C Healey re Watermark depo and procedural issues	\$888.00	0.30		\$266.40										
03/05/2021	Lourdes Castro (LEC)	communication with MTJ re zoom link for upcoming deposition and drafting email to OC	450	0.10		\$45.00		0.1								\$45.00
03/05/2021	Lourdes Castro (LEC)	drafting and sending email to OC re POS to NOD and subpoena for upcoming deposition	450	0.20		\$90.00		0.2								\$90.00
03/05/2021	Lourdes Castro (LEC)	communication wiith TSG re deposition cancelled	450	0.10		\$45.00		0.1								\$45.00

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>							
				<u>Worked</u>			<u>General</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
03/05/2021	Mark Johnson (MTJ)	call w/ Watermark counsel re depo, motion to quash	\$888.00	0.20		\$177.60								
03/05/2021	Travis Close (TCC)	Review and analyze letter from Ps to Ds re: outstanding discovery issues	\$888.00	0.20		\$177.60								
03/05/2021	Mark Johnson (MTJ)	draft email re withdrawal of Watermark depo notice	\$888.00	0.20		\$177.60								
03/05/2021	Mark Johnson (MTJ)	coms w/ COC re same and w/ staff re communications w/ reporter and opposing counsel, watermark counsel	\$888.00	0.20		\$177.60								
03/05/2021	Mark Johnson (MTJ)	call w/ Healey re Watermark deposition and their proposed motion to quash	\$888.00	0.10		\$88.80								
03/07/2021	Guy Wallace (GBW)	revise and edit draft amended MCC	\$1,188.00	1.50		\$1,782.00								
03/08/2021	Guy Wallace (GBW)	revise and edit amended MCC	\$1,188.00	2.90		\$3,445.20								
03/08/2021	Travis Close (TCC)	Review and analyze motion by watermark (nonparty) to quash deposition subpoena + supporting declarations	\$888.00	0.40		\$355.20								
03/09/2021	Travis Close (TCC)	Review judge's order directing third party movant to discovery master	\$888.00	0.20		\$177.60								
03/09/2021	Mark Johnson (MTJ)	strategy call w/ Healey, Umpierre re whether to withdraw 2nd 30 b 6 depo notice, pros and cons, other depositions to notice, prep for meet and confer session on that and other outstanding issues	\$888.00	0.80		\$710.40								
03/10/2021	Mark Johnson (MTJ)	prep for meet and confer session re 9 items, including review of prior MC correspondence and outline from BU	\$888.00	0.80		\$710.40								
03/10/2021	Mark Johnson (MTJ)	call w/ BU to discuss topics and strategy for meet and confer w/ OC on multiple discovery issues	\$888.00	0.50		\$444.00								
03/10/2021	Mark Johnson (MTJ)	meet and confer call w/ BU, Gorman, Allyn re depositions, multiple doc production and interrogatory disputes; proposed "pause" in discovery	\$888.00	1.30		\$1,154.40								
03/10/2021	Mark Johnson (MTJ)	call w BU and CJH re debriefing of meet and confer session; strategy, response to proposed pause in discovery	\$888.00	0.50		\$444.00								
03/11/2021	Ryan Bonner (RAB)	Preparing production SUN043 for hosting on Relativity	\$900.00	0.20		\$180.00	0.2	\$180.00						
03/11/2021	Travis Close (TCC)	Review and analyze notes from CH re: next steps in discovery	\$888.00	0.30		\$266.40								
03/11/2021	Travis Close (TCC)	Review and analyze notes on preliminary results of simple math study from DM	\$888.00	0.30		\$266.40								
03/11/2021	Travis Close (TCC)	Review list of case deadlines for upcoming discovery hearing and motions	\$888.00	0.20		\$177.60								
03/15/2021	Travis Close (TCC)	Review and analyze proposed elements of case schedule/status conference by MTJ	\$888.00	0.20		\$177.60								
03/15/2021	Mark Johnson (MTJ)	review and draft response to email from OC re proposed stip suspending discovery, with exceptions until after class cert order	\$888.00	0.40		\$355.20								
03/15/2021	Mark Johnson (MTJ)	multiple email exchanges w/ COC re draft and possible contingencies	\$888.00	0.20		\$177.60								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs		Hrs		Hrs		Hrs	
03/16/2021	Mark Johnson (MTJ)	conference call w/ Healey, Marks, Umpierre, Myrick, Thorton re discrepancies btwn pdf and csv assessment data and strategies for addressing same and/or approaching Ds re same and relationship to motion practice	\$888.00	1.10		\$976.80								
03/16/2021	Mark Johnson (MTJ)	email exchange w/ OC Gorman re timing of discovery motions and suspending discovery	\$888.00	0.10		\$88.80								
03/16/2021	Mark Johnson (MTJ)	call and email exchanges w/ CJH re timing of discovery motions, strategy for stipulation re pausing discovery, deadlines.	\$888.00	0.20		\$177.60								
03/17/2021	Lourdes Castro (LEC)	Finalizing and filing NOA for RLS	\$450.00	0.50		\$225.00	0.5	\$225.00						
03/17/2021	Lourdes Castro (LEC)	communication with RLS re filing NOA	\$450.00	0.10		\$45.00	0.1	\$45.00						
03/17/2021	Mark Johnson (MTJ)	call w/ CJH and BSU re proposed stip and issues re discovery that needs to be produced prior to class cert motion, other proposed changes to stip	\$888.00	1.00		\$888.00								
03/17/2021	Mark Johnson (MTJ)	review draft stip re caes dates and discovery	\$888.00	0.20		\$177.60								
03/18/2021	Mark Johnson (MTJ)	call w/ OC Gorman and BU re motions to strike experts, stipulation re cae schedule and issues to be addressed by answers or mtn	\$888.00	0.70		\$621.60								
03/18/2021	Mark Johnson (MTJ)	email to COC re status of list of pdf./csv assessment data discfrepancies	\$888.00	0.10		\$88.80								
03/19/2021	Ryan Bonner (RAB)	ESI QC of Defendant Production files in Case Folders	\$900.00	0.20		\$180.00	0.2	\$180.00						
03/19/2021	Mark Johnson (MTJ)	email exchanges w. COC re summary of data discrepancies btwn pdf data and csv data	\$888.00	0.20		\$177.60								
03/19/2021	Travis Close (TCC)	Review and analyze draft joint stipulation re case schedule (MTJ and JG edits)	\$888.00	0.30		\$266.40								
03/19/2021	Travis Close (TCC)	Review notice of withdrawal by watermark communities	\$888.00	0.20		\$177.60								
03/19/2021	Travis Close (TCC)	Review and analyze cites in Sunrise's privilege log	\$888.00	0.30		\$266.40								
03/19/2021	Mark Johnson (MTJ)	call w/ CJH, Umpierre, Thornton re proposed missing data issues and stip on schedule and strategy for approaching OC re same and re carve out for data-related issues	\$888.00	0.90		\$799.20								
03/20/2021	Mark Johnson (MTJ)	call w/ CJH, BSU re proposed response to OC Gorman re stip concerning schedule and motion carve out	\$888.00	0.80		\$710.40								
03/21/2021	Null User (NULL)	re-work draft emal to OC responding to email with position on sitpulation to modify schedule, discovery motion dates, carve out for data issues, settlement; email exchange w/ COC re same (.1); finalize email and edit spreadsheet attachment and send	\$100.00	-		\$0.00	0	\$0.00						
03/21/2021	Mark Johnson (MTJ)	re-work email to OC in response to position re stip to change case schedule and change discovery motion deadline and carve-out for data issues	\$888.00	1.60		\$1,420.80								
03/21/2021	Mark Johnson (MTJ)	share with OC, finalize email and modify attachment and send	\$888.00	0.20		\$177.60								
03/22/2021	Mark Johnson (MTJ)	review and analyze D's responses to 9th set of document request for meet and confer session	\$888.00	0.70		\$621.60								
03/22/2021	Mark Johnson (MTJ)	com w/ BU re prep for meet and confer w/ OC	\$888.00	0.20		\$177.60								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General Hrs	Fees	CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees	
03/22/2021	Mark Johnson (MTJ)	meet and confer cal w/ OC Gorman and Allyn and with BU re stip and potential discovery motions	\$888.00	1.00		\$888.00									
03/22/2021	Mark Johnson (MTJ)	follow-up call w/ Chris and Brian re strategy on motions to compel, stip re schedule.	\$888.00	0.70		\$621.60									
03/23/2021	Mark Johnson (MTJ)	review draft joint statement on MTC assessment data	\$888.00	0.20		\$177.60									
03/23/2021	Mark Johnson (MTJ)	draft email with comments re same	\$888.00	0.20		\$177.60									
03/23/2021	Travis Close (TCC)	Review and analyze BMU's notes re: 3-22 M/C call	\$888.00	0.20		\$177.60									
03/24/2021	Rachel Steyer (RLS)	reading and reviewing plaintiffs' amended motion for class certification	\$775.00	1.10		\$852.50	1.1	\$852.50							
03/29/2021	Guy Wallace (GBW)	review and analysis of Order from J. Staton re case schedule	\$1,188.00	0.10		\$118.80									
03/29/2021	Guy Wallace (GBW)	com's with CJH; MTJ re same	\$1,188.00	0.20		\$237.60									
03/31/2021	Mark Johnson (MTJ)	call w/ CJH and Brian Umpierre re planning for discovery motions based on proposed schedule per court's order and failure to vacate discovery motion deadline; conflict and negotiations re discovery motions w/ OC	\$888.00	0.70		\$621.60									
03/31/2021	Mark Johnson (MTJ)	tag-on call with Healey, Umpierre, adding Marks to discuss sufficiency of supplemental data production and expert report timeline to inform negotiations w. OC re discovery motions and schedule	\$888.00	0.30		\$266.40									
03/31/2021	Mark Johnson (MTJ)	multiple follow-up email exchanges w/ BU, CJH re conflict with OC over discovery motion and case schedule; proposed call w/ Judge Guilford.	\$888.00	1.00		\$888.00									
03/31/2021	Guy Wallace (GBW)	com's with CJH; BU; MTJ re case schedule and meet and confer issues re same	\$1,188.00	0.40		\$475.20									
04/01/2021	Mark Johnson (MTJ)	call w/ BU re strategy for call with Judge Guilford re discovery motions, case schedule	\$888.00	0.50		\$444.00									
04/01/2021	Mark Johnson (MTJ)	call w. OC Joe Gorman and COC BU re discovery motions and case schedule, including call in to Judge Guilford and message	\$888.00	0.50		\$444.00									
04/01/2021	Mark Johnson (MTJ)	follow up call w. BU re issues related to discovery motions, timing and inability to defer motions with proposed schedule, strategy for communicating w. OC re same.	\$888.00	0.50		\$444.00									
04/01/2021	Mark Johnson (MTJ)	calls (x2) with COC BU and CJH concerning strategy for discovery motion timing and case schedule and agreement with OC re motions, various contingencies	\$888.00	1.20		\$1,065.60									
04/01/2021	Mark Johnson (MTJ)	review and comment by email on proposed submission to court re schedule, redlines from CJH to same	\$888.00	0.40		\$355.20									
04/01/2021	Mark Johnson (MTJ)	draft email to OC re same and position on motions	\$888.00	0.20		\$177.60									
04/05/2021	Rachel Steyer (RLS)	reviewing plaintiffs position re joint stip on motion to compel further discovery	\$775.00	0.40		\$310.00	0.4	\$310.00							
04/05/2021	Guy Wallace (GBW)	com's with CJH re schedule on class certification and briefing re same; staffing analysis	\$1,188.00	0.40		\$475.20									
04/06/2021	Lourdes Castro (LEC)	adding deadline dates to CM per ECF 364	\$450.00	0.50		\$225.00	0.5	\$225.00							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
04/07/2021	Guy Wallace (GBW)	legal research and analysis re Olean decision re uninjured class members	\$1,188.00	0.70							
04/07/2021	Guy Wallace (GBW)	com's with CJH and MTJ re same	\$1,188.00	0.20							
04/12/2021	Mark Johnson (MTJ)	call w/ Healey, Umpierre re completing discovery motions	\$888.00	0.40							
04/15/2021	Travis Close (TCC)	Review and analyze letter by BSU re: meet and confer on additional discovery required	\$888.00	0.30							
04/15/2021	Mark Johnson (MTJ)	call w/ CJH re strategy for ltr to OC re briefing schedules on discovery motions, other discovery issues	\$888.00	0.30							
04/15/2021	Mark Johnson (MTJ)	review revised ltr from CJH re briefing schedule on discovery motion, other discovery issues, CLM inspections	\$888.00	0.10							
04/15/2021	Mark Johnson (MTJ)	email to CJH re same	\$888.00	0.10							
04/22/2021	Travis Close (TCC)	Review/analyze updates from DM re: shortfall analysis	\$888.00	0.20							
04/23/2021	Lourdes Castro (LEC)	Adding calendar event dates in CM	\$450.00	1.00			1		\$450.00		
04/29/2021	Rachel Steyer (RLS)	reading through plaintiffs' position re joint stipulation on plaintiffs motion to compel assessment related data	\$775.00	0.40			0.4		\$310.00		
04/29/2021	Guy Wallace (GBW)	review and analysis of com from CJH and KAS re potential approach to settlement	\$1,188.00	1.00							
04/29/2021	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20							
04/29/2021	Guy Wallace (GBW)	legal research and analysis re Ninth Circuit decision in Olean v. Bumble Bee and potential issues re uninjured class members	\$1,188.00	0.90							
04/30/2021	Guy Wallace (GBW)	com's with CJH; BU; MTJ re Ninth Circuit's decision in Olean and potential arguments re same; potential settlement options	\$1,188.00	0.70							
05/03/2021	Ryan Bonner (RAB)	Creating password for Denton's Kiteworks	\$900.00	0.20			0.2		\$180.00		
05/03/2021	Mark Johnson (MTJ)	participate in go to meeting conference re pro-model staffing analysis with Marks, GBW, Thornton, Healey, Thamer, Flores, Umpierre, Schroyer,	\$888.00	1.70						1.7	1,509.60
05/03/2021	Guy Wallace (GBW)	tc with DTM; DS; Flores; CJH; MT; BU; MTJ re results of initial shortfall analysis of 6 Sunrise facilities	\$1,188.00	1.80						1.8	2,138.40
05/03/2021	Mark Johnson (MTJ)	com w/ GBW - follow up on GTM presentation on plans for expert analysis of staffing.	\$888.00	0.20							
05/06/2021	Mark Johnson (MTJ)	call w/ CJH, BU, Jim Thornton to discuss staffing analysis, results of CLM virtual inspection, remaining data/information to be corrected or obtained; use of CLM information and next steps on pending discovery issues.	\$888.00	1.30							
05/06/2021	Mark Johnson (MTJ)	review prior emails from BSU, CJH and summary of CLM inspection as prep for team call on discovery	\$888.00	0.40							
05/07/2021	Ryan Bonner (RAB)	New Password for Plaintiff production	\$900.00	0.10			0.1		\$90.00		
05/10/2021	Guy Wallace (GBW)	com's with CJH; KAS re further settlement response to D's	\$1,188.00	0.30							
06/02/2021	Guy Wallace (GBW)	com's with CJH; KAS; Marks; MTJ re class certification and settlement	\$1,188.00	0.90							
06/11/2021	Lourdes Castro (LEC)	Serving letter to Judge Guilford	\$450.00	0.90			0.9		\$405.00		
06/16/2021	Michelle Lim (MSL)	review mail improperly processed in heredia v. san ysidro; crsp to front desk re same	\$850.00	0.10			0.1		\$85.00		
06/21/2021	Silvia Carter (SGC)	Review/revise ELB Decl and Separate Statement.	450	0.80			0.8		\$360.00		

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions					
				Worked			General	CC Confs	Falkenberg	Travel		
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees
06/21/2021	Travis Close (TCC)	Review/analyze decision in Olean (Williams v. Apple) shared by co-counsel re: issue of whether challenged policy results in legal injury	\$888.00	0.50		\$444.00						
06/25/2021	Guy Wallace (GBW)	review and analysis of S.Ct. decision in TransUnion v. Ramirez	\$1,188.00	1.30		\$1,544.40						
06/28/2021	Lourdes Castro (LEC)	Searching documents per GBW's request	450	2.80		\$1,260.00	2.8	\$1,260.00				
06/28/2021	Guy Wallace (GBW)	review and analysis of D's opposition to amended MCC	\$1,188.00	3.10		\$3,682.80						
06/28/2021	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.30		\$356.40						
06/29/2021	Mark Johnson (MTJ)	team call (GBW, BU, CJH, MY) re D opp to class cert and preparation of reply, strategy for responding to arguments and factual contentions.	\$888.00	1.10		\$976.80			1.1	976.8		
06/29/2021	Guy Wallace (GBW)	review and analysis of D's opposition to P's amended motion for class certification	\$1,188.00	2.20		\$2,613.60						
06/29/2021	Guy Wallace (GBW)	review and analysis of moving papers and reply brief from initial motion	\$1,188.00	1.00		\$1,188.00						
06/29/2021	Guy Wallace (GBW)	preparation of list of issues to be addressed in reply brief on amended motion	\$1,188.00	0.50		\$594.00						
06/29/2021	Guy Wallace (GBW)	com's with CJH; MAY; BU; MTJ re preparation of reply brief on amended MCC	\$1,188.00	1.10		\$1,306.80						
06/30/2021	Lourdes Castro (LEC)	Communication with RAB re downloading documents	450	0.10		\$45.00	0.1	\$45.00				
06/30/2021	Lourdes Castro (LEC)	Attempting to download documents regarding documents filed under seal	450	0.20		\$90.00	0.2	\$90.00				
06/30/2021	Guy Wallace (GBW)	legal research and analysis re implications of TransUnion; Olean decisions	\$1,188.00	0.60		\$712.80						
07/01/2021	Guy Wallace (GBW)	review and analysis of Olean decision and its progeny	\$1,188.00	1.20		\$1,425.60						
07/07/2021	Guy Wallace (GBW)	review and analysis of draft of reply brief re MCC	\$1,188.00	1.30		\$1,544.40						
07/07/2021	Guy Wallace (GBW)	tc with CJH; PK; LP re preparation of reply brief and declarations re class cert	\$1,188.00	0.80		\$950.40						
07/10/2021	Guy Wallace (GBW)	legal research and analysis re discretion; happy camper declarations in opposition to MCCs	\$1,188.00	0.80		\$950.40						
07/12/2021	Guy Wallace (GBW)	revise and edit draft class cert reply brief	\$1,188.00	5.50		\$6,534.00						
07/13/2021	Guy Wallace (GBW)	revise and edit draft reply brief re class certification	\$1,188.00	3.10		\$3,682.80						
07/14/2021	Guy Wallace (GBW)	review and analysis of draft objections to D's happy camper declarations	\$1,188.00	0.40		\$475.20						
07/15/2021	Guy Wallace (GBW)	com's with CJH; Marks re preparation of reply brief re MCC	\$1,188.00	0.40		\$475.20						
07/15/2021	Guy Wallace (GBW)	revise and edit further draft of class cert reply brief	\$1,188.00	1.40		\$1,663.20						
07/15/2021	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20		\$237.60						
07/15/2021	Guy Wallace (GBW)	review and analysis of Schroyer Declaration re amended MCC	\$1,188.00	0.30		\$356.40						
07/16/2021	Guy Wallace (GBW)	revise and edit class cert reply brief	\$1,188.00	0.60		\$712.80						
07/16/2021	Guy Wallace (GBW)	com's with CJH; Marks; re same	\$1,188.00			\$0.00						
07/21/2021	Travis Close (TCC)	Review and analyze Ps' reply brief iso renewed motion for class cert	\$888.00	0.50		\$444.00						
08/03/2021	Guy Wallace (GBW)	com's with Marks; MTJ; CJH re D's argument that P's have violated a protective order from the Aegis case	\$1,188.00	1.20		\$1,425.60						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
08/03/2021	Guy Wallace (GBW)	com's with CJH; MAY; BU; MTJ re en banc order in Olean case	\$1,188.00	0.20			\$237.60				
08/09/2021	Travis Close (TCC)	Review and analyze notice of supp authority	\$888.00	0.40			\$355.20				
08/12/2021	Gabriel Hemphill (GCH)	Research re: Terminating Attorney-Client Relationship	690	1.60			\$1,104.00	1.6	\$1,104.00		
08/20/2021	Lourdes Castro (LEC)	Locating documents and sending them to GBW per his request	450	0.30			\$135.00	0.3	\$135.00		
08/20/2021	Rachel Steyer (RLS)	left VM with class member declarant who had called asking for update	775	0.10			\$77.50	0.1	\$77.50		
08/20/2021	Travis Close (TCC)	Review and analyze reply iso motion to strike Schroyer declaration	\$888.00	0.30			\$266.40				
08/20/2021	Guy Wallace (GBW)	review and analysis of D's request to file a sur-reply re class certification	\$1,188.00	2.20			\$2,613.60				
08/20/2021	Guy Wallace (GBW)	review and analysis of schedule; class cert briefs; Schroyer Declaration; Umpierre Declaration	\$1,188.00	0.50			\$594.00				
08/20/2021	Guy Wallace (GBW)	com's with CJH; BU; MTJ re same	\$1,188.00	0.50			\$594.00				
08/20/2021	Guy Wallace (GBW)	legal research and analysis re new arguments and evidence on reply, and when submitting same is permissible	\$1,188.00	0.90			\$1,069.20				
08/22/2021	Guy Wallace (GBW)	preparation and drafting of P's opposition to D's request for sur reply;	\$1,188.00	3.80			\$4,514.40				
08/22/2021	Guy Wallace (GBW)	review and analysis of D's motion to strike Schroyer Reply Declaration; Schroyer Reply Declaration; D's opposition to class certification; Umpierre Reply Declaration	\$1,188.00	2.00			\$2,376.00				
08/23/2021	Lourdes Castro (LEC)	Finalizing and filing Opp to Defendants' Request for A Sur-Reply	450	0.40			\$180.00	0.4	\$180.00		
08/23/2021	Lourdes Castro (LEC)	Communication with GBW re Finalizing and filing Opp to Defendants' Request for A Sur-Reply	450	0.10			\$45.00	0.1	\$45.00		
08/23/2021	Lourdes Castro (LEC)	Drafting a notice of errata for review	450	0.40			\$180.00	0.4	\$180.00		
08/23/2021	Lourdes Castro (LEC)	Communication with ECF clerk re notice or errata	450	0.20			\$90.00	0.2	\$90.00		
08/23/2021	Lourdes Castro (LEC)	Finalizing and filing notice of errata	450	0.30			\$135.00	0.3	\$135.00		
08/23/2021	Guy Wallace (GBW)	preparation and drafting of opposition to D's request for sur-reply	\$1,188.00	3.70			\$4,395.60				
08/23/2021	Travis Close (TCC)	Review and analyze Opposition to Def's request for a sur reply	\$888.00	0.20			\$177.60				
08/23/2021	Guy Wallace (GBW)	com's with CJH; DTM; MTJ re opposition to D's request for sur-reply	\$1,188.00	0.50			\$594.00				
08/24/2021	Guy Wallace (GBW)	review and analysis of D's opposition to class certification	\$1,188.00	1.80			\$2,138.40				
08/24/2021	Guy Wallace (GBW)	preparation for hearing on class certification	\$1,188.00	1.00			\$1,188.00				
08/24/2021	Guy Wallace (GBW)	preparation of notes re class certification hearing set for 8/27	\$1,188.00	1.70			\$2,019.60				
08/24/2021	Guy Wallace (GBW)	review and analysis of P's moving papers	\$1,188.00	1.00			\$1,188.00				
08/25/2021	Silvia Carter (SGC)	Check Mail email re documents received.	450	0.10			\$45.00	0.1	\$45.00		
08/25/2021	Silvia Carter (SGC)	Emails to/from FrontDesk, ELB team, CHC, and GBW re documents received.	450	0.10			\$45.00	0.1	\$45.00		

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions					
				Worked			General	CC Confs	Falkenberg	Travel		
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees
08/25/2021	Michael Garcia (MEG)	Heredia, Audrey v. Sunrise Senior Living Casenum101408 - Case mixedup re Email from ELB. No calendaring for Heredia, Audrey v. San Ysidro Health Center, Inc.	325		0.20	\$65.00	0.2	\$65.00				
08/25/2021	Guy Wallace (GBW)	analysis of evidence re D's target staffing system and implementation thereof at D's assisted living facilities		\$1,188.00	0.70	\$831.60						
08/25/2021	Guy Wallace (GBW)	com's with CJH re preparation for hearing on motion for class certification		\$1,188.00	1.50	\$1,782.00						
08/25/2021	Guy Wallace (GBW)	preparation of notes re class certification hearing; P's affirmative argument; response to potential questions		\$1,188.00	2.70	\$3,207.60						
08/25/2021	Guy Wallace (GBW)	review and analysis of D's opposition brief and P's reply brief		\$1,188.00	1.20	\$1,425.60						
08/25/2021	Guy Wallace (GBW)	preparation for hearing on motion for class certification		\$1,188.00	0.50	\$594.00						
08/27/2021	Guy Wallace (GBW)	prepare for hearing on P's motion for class certification		\$1,188.00	0.90	\$1,069.20						
08/27/2021	Guy Wallace (GBW)	attend hearing on P's motion for class certification		\$1,188.00	0.50	\$594.00						
08/27/2021	Guy Wallace (GBW)	com's with CJH; BU; MTJ re results of hearing		\$1,188.00	0.80	\$950.40						
08/27/2021	Guy Wallace (GBW)	review and analysis of Court's order setting schedule re motions to strike		\$1,188.00	0.10	\$118.80						
08/30/2021	Guy Wallace (GBW)	analysis of class certification hearing and arguments therein		\$1,188.00	1.20	\$1,425.60						
08/30/2021	Guy Wallace (GBW)	com's with CJH re hearing on class certification and opposition to D's motion to strike Schroyer reply declaration		\$1,188.00	0.80	\$950.40						
08/31/2021	Lourdes Castro (LEC)	Adding hearing dates and motions due dates in CM	450		0.40	\$180.00	0.4	\$180.00				
09/01/2021	Ashley Hermann (AZH)	email re briefs	450		0.10	\$45.00	0.1	\$45.00				
09/01/2021	Travis Close (TCC)	Review and analyze Def's sur reply to amended motion for class cert		\$888.00	0.30	\$266.40						
09/01/2021	Guy Wallace (GBW)	analysis of further discovery needs		\$1,188.00	0.30	\$356.40						
09/01/2021	Guy Wallace (GBW)	com's with CJH; MTJ re same		\$1,188.00	0.20	\$237.60						
09/07/2021	Guy Wallace (GBW)	com's with CJH; MTJ re opposition to D's motion to strike the reply declaration of Schroyer		\$1,188.00	0.90	\$1,069.20						
09/09/2021	Guy Wallace (GBW)	review and analysis of draft of proposed stipulation re continuing pretrial deadlines		\$1,188.00	0.40	\$475.20						
09/09/2021	Guy Wallace (GBW)	com's with BU; MTJ re same		\$1,188.00	0.20	\$237.60						
09/10/2021	Guy Wallace (GBW)	review and analysis of com's re case schedule, D's insistence on 4 month extension of schedule vs. 6 months		\$1,188.00	0.20	\$237.60						
09/12/2021	Guy Wallace (GBW)	review and analysis of D's motion to strike reply declaration of Schroyer		\$1,188.00	1.90	\$2,257.20						
09/13/2021	Guy Wallace (GBW)	review and analysis of Umpierre declarations re P's and D's production of information re Schroyer		\$1,188.00	1.10	\$1,306.80						
09/13/2021	Guy Wallace (GBW)	review and analysis of D's motion to strike Schroyer reply declaration		\$1,188.00	2.20	\$2,613.60						
09/13/2021	Guy Wallace (GBW)	com's with BU; MTJ re same and responsive arguments		\$1,188.00	0.20	\$237.60						
09/13/2021	Guy Wallace (GBW)	legal research and analysis re whether Rule 26(a)(2) requirements for expert reports apply at the class certification stage, or at trial		\$1,188.00	0.80	\$950.40						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
09/14/2021	Guy Wallace (GBW)	preparation of outline of responsive points re D's MTS Schroyer Reply Declaration	\$1,188.00	2.80		\$3,326.40								
09/14/2021	Guy Wallace (GBW)	preparation of points re MTS Schroyer Reply Declaration	\$1,188.00	3.20		\$3,801.60								
09/16/2021	Guy Wallace (GBW)	review and analysis of Crandall declaration; Marks emails re history of production of data re DES analysis	\$1,188.00	1.90		\$2,257.20								
09/16/2021	Guy Wallace (GBW)	preparation of outline of Schroyer opposition declaration	\$1,188.00	0.50		\$594.00								
09/17/2021	Travis Close (TCC)	Review and analyze parties' request for schedule extension	\$888.00	0.20		\$177.60								
09/17/2021	Guy Wallace (GBW)	review and analysis of Umpierre Declarations re Amended MCC; Gorman Declaration re MTS Schroyer Reply Declaration; P's Amended MCC	\$1,188.00	1.70		\$2,019.60								
09/17/2021	Guy Wallace (GBW)	preparation of points re Umpierre declaration in opposition to D's MTS Schroyer Reply Declaration; com's with BU re same (.5)	\$1,188.00	0.50		\$594.00								
09/17/2021	Guy Wallace (GBW)	com's with CJH; Marks; Umpierre; MTJ re arguments in opposition to D's MTS Schroyer Reply Declaration and analysis of same	\$1,188.00	0.70		\$831.60								
09/17/2021	Guy Wallace (GBW)	legal research and analysis re case law re Rule 26(a)(2) disclosure requirements and whether they apply at the class certification stage	\$1,188.00	1.20		\$1,425.60								
09/17/2021	Guy Wallace (GBW)	analysis of D's argument that P's should have filed a request to extend the class certification schedule so that the DES analysis could be submitted with P's opening papers on class certification	\$1,188.00	0.60		\$712.80								
09/17/2021	Guy Wallace (GBW)	legal research and analysis re same	\$1,188.00	0.50		\$594.00								
09/20/2021	Guy Wallace (GBW)	com's with BU re D's contention that Judge Staton's case management order requires compliance with Rule 26(a)(2), and parties meet and confer and areas of agreement and disagreement re same	\$1,188.00	0.30		\$356.40								
09/20/2021	Guy Wallace (GBW)	legal research and analysis re case law re whether Rule 26(a)(2) applies at the class certification stage	\$1,188.00	0.80		\$950.40								
09/20/2021	Guy Wallace (GBW)	preparation and drafting of opposition to MTS Schroyer Reply Declaration	\$1,188.00	2.20		\$2,613.60								
09/20/2021	Guy Wallace (GBW)	com's with MTJ re same and production of .mod files by Schroyer	\$1,188.00	0.20		\$237.60								
09/21/2021	Guy Wallace (GBW)	com's with BU re production of expert materials re Schroyer Reply Declaration	\$1,188.00	0.70		\$831.60								
09/21/2021	Guy Wallace (GBW)	com's with PK; LP; DTM; JT; CJH; BU; MTJ re proposed sampled methodology re omitted care analysis	\$1,188.00	1.40		\$1,663.20								
09/21/2021	Guy Wallace (GBW)	preparation and drafting of opposition to D's MTS Schroyer Reply Declaration	\$1,188.00	4.20		\$4,989.60								
09/21/2021	Mark Johnson (MTJ)	calls w/ GBW (x2) re opp to mtn to strike Schroyer reply declaration, expert disclosure issues	\$888.00	0.70		\$621.60								
09/22/2021	Guy Wallace (GBW)	preparation and drafting of opposition to D's MTS Schroyer Reply Declaration	\$1,188.00	0.80		\$950.40								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions									
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees		
							Hrs		Hrs		Hrs		Hrs		Hrs	
09/23/2021	Guy Wallace (GBW)	preparation and drafting of opposition to D's MTS Schroyer Reply Declaration	\$1,188.00	3.40		\$4,039.20										
09/23/2021	Guy Wallace (GBW)	review and analysis of draft of Umpierre declaration re opposition to MTS Schroyer Reply Declaration	\$1,188.00	0.60		\$712.80										
09/24/2021	Guy Wallace (GBW)	preparation and drafting of opposition to MTS Schroyer Reply Declaration; statement of facts	\$1,188.00	1.60		\$1,900.80										
09/24/2021	Guy Wallace (GBW)	review and analysis of drafts of Umpierre Declaration	\$1,188.00	0.90		\$1,069.20										
09/24/2021	Guy Wallace (GBW)	com's with BU re same (.4)	\$1,188.00	0.40		\$475.20										
09/24/2021	Guy Wallace (GBW)	legal research and analysis re potential impositions of sanctions, including striking the Schroyer Reply Declaration, arising from non-production of .mod files	\$1,188.00	1.20		\$1,425.60										
09/24/2021	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20		\$237.60										
09/24/2021	Mark Johnson (MTJ)	call w/ GBW re opp to mtn to strike Schroyer declaration and issues re disclosure of .mod files	\$888.00	0.30		\$266.40										
09/25/2021	Guy Wallace (GBW)	preparation and drafting of opposition to MTS Schroyer Reply Declaration	\$1,188.00	3.10		\$3,682.80										
09/26/2021	Guy Wallace (GBW)	preparation and drafting of opposition to D's motion to strike Schroyer Reply Declaration	\$1,188.00	1.80		\$2,138.40										
09/27/2021	Lourdes Castro (LEC)	450 Calendar dates in CM per ECF 477		0.30		\$135.00	0.3		\$135.00							
09/27/2021	Guy Wallace (GBW)	preparation and drafting of opposition to MTS Schroyer Reply Declaration	\$1,188.00	4.80		\$5,702.40										
09/27/2021	Guy Wallace (GBW)	com's with CJH; DTM; BU; MTJ re same	\$1,188.00	0.70		\$831.60										
09/27/2021	Travis Close (TCC)	Review and analyze court's order modifying scheduling order	\$888.00	0.10		\$88.80										
09/27/2021	Travis Close (TCC)	Review and analyze protective order	\$888.00	0.30		\$266.40										
09/27/2021	Mark Johnson (MTJ)	calls w/ GBW re MTS Schroyer reply declaration and declaration in oppositon to same; issue of production of .mod files and pkg files from medmodel.	\$888.00	0.50		\$444.00										
09/27/2021	Mark Johnson (MTJ)	review of draft opp to mtn to strike Schroyer reply declaration	\$888.00	1.00		\$888.00										
09/27/2021	Mark Johnson (MTJ)	review and analysis of Schroyer declaration iso mtn to strike his reply declration	\$888.00	0.60		\$532.80										
09/27/2021	Guy Wallace (GBW)	review and analysis of draft declaration of Schroyer re D's MTS Schroyer Reply Declaration	\$1,188.00	0.70		\$831.60										
09/28/2021	Guy Wallace (GBW)	com's with CJH; BU re opposition to D's MTS Schroyer Reply Declaration	\$1,188.00	0.70		\$831.60										
09/28/2021	Guy Wallace (GBW)	revise and edit draft of opposition to D's MTS Schroyer Reply Declaration	\$1,188.00	3.90		\$4,633.20										
09/29/2021	Guy Wallace (GBW)	com's with CJH; DTM; BU; re production of .mod files or .pkg files and disclosure obligations	\$1,188.00	1.50		\$1,782.00										
09/29/2021	Guy Wallace (GBW)	com's with CJH; BU; MTJ re preparation of opposition to D's MTS Schroyer Reply Declaration	\$1,188.00	0.40		\$475.20										
09/29/2021	Guy Wallace (GBW)	preparation and drafting of opposition to D's MTS Schroyer Reply Declaration	\$1,188.00	2.70		\$3,207.60										
09/29/2021	Mark Johnson (MTJ)	review caselaw re intellectual property claims as basis for not producing expert work product	\$888.00	1.80		\$1,598.40										

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
09/29/2021	Guy Wallace (GBW)	review and analysis of draft Umpierre Declaration re D's MTS Schroyer Reply Declaration	\$1,188.00	1.20							
09/29/2021	Guy Wallace (GBW)	revise and edit same	\$1,188.00	0.50							
09/30/2021	Lourdes Castro (LEC)	running tables for Ps Opp to Ds Mtn to Strike brief	450	3.20			\$1,440.00				
09/30/2021	Lourdes Castro (LEC)	comms with GBW re running tables	450	0.10			\$45.00	0.1	\$45.00		
09/30/2021	Guy Wallace (GBW)	com's with Marks; CJH; BU; MTJ re P's opposition to D's MTS Schroyer Reply Declaration; BU Declaration re same; Schroyer Declaration re same	\$1,188.00	1.60							
09/30/2021	Guy Wallace (GBW)	revise and edit P's draft opposition to D's MTS Schroyer Reply Declaration	\$1,188.00	5.20							
09/30/2021	Guy Wallace (GBW)	com's with BU; LEC re same	\$1,188.00	0.40							
10/01/2021	Travis Close (TCC)	Research whether the Get Seen Media decision of June 23, 2021 is still good law on Lexis and Docketbird	\$888.00	0.50							
10/01/2021	Guy Wallace (GBW)	review and analysis of final drafts of opposition to D's MTS Schroyer Reply Declaration; Schroyer Declaration re same	\$1,188.00	2.30							
10/01/2021	Guy Wallace (GBW)	com's with CJH; DTM; BU; MTJ re same	\$1,188.00	0.20							
10/04/2021	Travis Close (TCC)	Review and analyze Ps' opposition to Ds motion to strike + related declarations	\$888.00	0.50							
10/06/2021	Guy Wallace (GBW)	com's with Marks; Thornton; CJH; MTJ re D's com's with MedModel ee's re litigation-related issues	\$1,188.00	0.90							
10/06/2021	Mark Johnson (MTJ)	com w/ GBW re mod files issue and Resolution Economics contact with MedModel	\$888.00	0.10							
10/07/2021	Mark Johnson (MTJ)	call with GBW, Healey, Marks, Thornton, Thamer, Umpierre re strategy for addressing Resolution Economics contact with MedModel	\$888.00	0.60							
10/07/2021	Guy Wallace (GBW)	com's with CJH; DTM; BU; MTJ re D's com's with MedModel and responsive steps re same	\$1,188.00	1.10							
10/15/2021	Guy Wallace (GBW)	review and analysis of Defendants' reply brief re MTS declaration of Dr. Flores	\$1,188.00	0.40							
10/15/2021	Mark Johnson (MTJ)	review reply memo from Ds iso mtn to strike Schroyer reply dec.	\$888.00	0.60							
10/25/2021	Guy Wallace (GBW)	preparation for hearing on class certification	\$1,188.00	0.50							
10/26/2021	Guy Wallace (GBW)	preparation for hearing on motion for class certification; motions to strike Schroyer and Flores declarations	\$1,188.00	1.80							
10/27/2021	Guy Wallace (GBW)	review and analysis of D's reply briefs re MTS's re Dr. Flores; Dr. Kennedy; Schroyer	\$1,188.00	2.20							
10/27/2021	Guy Wallace (GBW)	com's with CJH; DTM; JT; BU re preparation for hearing on class certification; motions to strike expert declarations	\$1,188.00	1.40							
10/27/2021	Guy Wallace (GBW)	preparation of notes re second hearing on class certification and related motions	\$1,188.00	1.50							
10/27/2021	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20							
10/28/2021	Guy Wallace (GBW)	com's with CJH re preparation for hearing on class certification and motions to strike	\$1,188.00	0.50							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
10/31/2021	Guy Wallace (GBW)	com's with CJH re Wolin/Nissan and J. Staton remarks re same at initial hearing on class cert	\$1,188.00	0.50							
11/01/2021	Guy Wallace (GBW)	com's with CJH; DTM; MTJ re motion to strike Schroyer Reply Declaration and whether further submissions would be helpful	\$1,188.00	0.40							
11/05/2021	Guy Wallace (GBW)	hearing on motions to strike re class cert experts	\$1,188.00	0.90	\$1,069.20						
11/05/2021	Guy Wallace (GBW)	com's with CJH; DTM; MTJ re same	\$1,188.00	0.50	\$594.00						
11/05/2021	Guy Wallace (GBW)	com's with CJH re experts and work on staffing	\$1,188.00	0.40	\$475.20						
11/05/2021	Mark Johnson (MTJ)	attend (virtually) hearing on mtn to strike expert declaration iso class cert mtn	\$888.00	0.90	\$799.20						
11/08/2021	Lourdes Castro (LEC)	Comms with MTJ and GBW re ordering hearing transcript	450	0.10	\$45.00		0.1	\$45.00			
11/10/2021	Travis Close (TCC)	Review and analyze team notes re: issues with medmodel software from Crandall's analysis	\$888.00	0.30	\$266.40						
11/10/2021	Mark Johnson (MTJ)	com w/ GBW, Stebner, Healey, Marks re settlement concept floated by OC Charlie Lee, then Lee joined	\$888.00	0.90	\$799.20						
11/10/2021	Mark Johnson (MTJ)	follow-up call w/ GBW re settlement proposal concept from OC and ethical considerations	\$888.00	0.10	\$88.80						
11/10/2021	Guy Wallace (GBW)	com's with Lee; KAS; BU; CJH; DTM; MTJ re settlement	\$1,188.00	1.20	\$1,425.60						
11/12/2021	Brian Lee (BGL)	Draft objection to D's unilateral stipulation	825	3.00	\$2,475.00		3	\$2,475.00			
11/16/2021	Rachel Steyer (RLS)	attempting to search for and download unredacted version of court's order re motion for class cert	775	0.20	\$155.00		0.2	\$155.00			
11/16/2021	Lourdes Castro (LEC)	Attempting to download order filed under seal by the Court	450	0.60	\$270.00		0.6	\$270.00			
11/16/2021	Lourdes Castro (LEC)	Communication with the clerk re order filed by the Court under seal	450	0.10	\$45.00		0.1	\$45.00			
11/16/2021	Lourdes Castro (LEC)	Comms with TCC re order filed under seal by the Court	450	0.10	\$45.00		0.1	\$45.00			
11/16/2021	Rachel Steyer (RLS)	reading order granting motion for class cert and denying defendants motion to strike expert testimony	775	0.80	\$620.00		0.8	\$620.00			
11/16/2021	Travis Close (TCC)	Review and analyze court's order denying motions to strike expert testimony	\$888.00	0.70	\$621.60						
11/16/2021	Guy Wallace (GBW)	review and analysis of decision granting motion for class certification	\$1,188.00	0.90	\$1,069.20						
11/16/2021	Guy Wallace (GBW)	com's with CJH; KAS; BU; MTJ re same	\$1,188.00	0.20	\$237.60						
11/16/2021	Travis Close (TCC)	Work with LEC to attempt at retrieving sealed version of class cert order from Pacer/ECF system	\$888.00	0.50	\$444.00						
11/16/2021	Travis Close (TCC)	Email to GBW re: unable to download sealed version of court's order from Pacer	\$888.00	0.20	\$177.60						
11/16/2021	Travis Close (TCC)	Review and analyze rule 23(f) brief and opposition from Plaintiffs in prior case	\$888.00	0.50	\$444.00						
11/16/2021	Travis Close (TCC)	Call with LEC re: locating rule 23(f) motion in prior case	\$888.00	0.20	\$177.60						
11/16/2021	Guy Wallace (GBW)	com's with CJH; MTJ re Defendants' potential Rule 23(f) appeal; schedule re same; preparation for further litigation in the district court	\$1,188.00	1.10	\$1,306.80						
11/16/2021	Mark Johnson (MTJ)	review and analyze decision granting mtn for class certification and denying motions to strike expert declarations	\$888.00	0.80	\$710.40						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
11/17/2021	Silvia Carter (SGC)	FW email to Mail re correspondence saved to the incorrect file.	450		0.10		\$45.00				
11/17/2021	Rachel Steyer (RLS)	reviewing unsealed portions of order granting class cert	775		0.20		\$155.00	0.2	\$155.00		
11/17/2021	Travis Close (TCC)	Review and analyze unsealed portions of yesterday's order granting class cert (highlighted)		\$888.00	0.20		\$177.60				
11/17/2021	Mark Johnson (MTJ)	call w/ Healey, GBW, Umpierre re post certification discovery follow up with Judge Guillford, meet and confer w/ OC, class notice.		\$888.00	0.90		\$799.20				
11/17/2021	Mark Johnson (MTJ)	email exchange w/ court re unredacted version of order on class cert		\$888.00	0.10		\$88.80				
11/17/2021	Mark Johnson (MTJ)	review redacted portions of class cert decision com's with CJH; DTM; BU; MTJ re class certification order and		\$888.00	0.30		\$266.40				
11/17/2021	Guy Wallace (GBW)	further discovery issues; preparation of expert reports; pretrial submissions		\$1,188.00	1.10		\$1,306.80				
11/17/2021	Guy Wallace (GBW)	review and analysis of District Court's opinion granting class certification		\$1,188.00	0.60		\$712.80				
11/20/2021	Mark Johnson (MTJ)	call w/ GBW re class notice		\$888.00	0.10		\$88.80				
11/21/2021	Mark Johnson (MTJ)	legal research re shifting cost of notice, form of notice of class certification.		\$888.00	2.50		\$2,220.00				
11/21/2021	Mark Johnson (MTJ)	draft email to COC re results of research on shifting cost of notice, points to consider for form of notice, including publication, posting, etc.		\$888.00	0.50		\$444.00				
11/22/2021	Mark Johnson (MTJ)	work on short form of class notice		\$888.00	1.50		\$1,332.00				
11/22/2021	Mark Johnson (MTJ)	complete draft short from notice		\$888.00	0.80		\$710.40				
11/22/2021	Mark Johnson (MTJ)	com w/ CH re same		\$888.00	0.20		\$177.60				
11/22/2021	Mark Johnson (MTJ)	call w GBW re draft of proposed short form class notice, production of data by Ds and staffing analysis, schedule		\$888.00	0.30		\$266.40				
11/22/2021	Guy Wallace (GBW)	review and analysis of pretrial schedule and trial preparation; expert report deadlines; need for staffing analysis re 43 facilities		\$1,188.00	0.80		\$950.40				
11/22/2021	Guy Wallace (GBW)	com's with MTJ re same (.3)		\$1,188.00	0.30		\$356.40				
11/22/2021	Guy Wallace (GBW)	review and analysis of draft of class notice		\$1,188.00	0.50		\$594.00				
11/22/2021	Mark Johnson (MTJ)	email exchange w/ BU re conferring w/ OC re discovery and class notice		\$888.00	0.10		\$88.80				
11/22/2021	Mark Johnson (MTJ)	review email from OC re same		\$888.00	0.10		\$88.80				
11/23/2021	Mark Johnson (MTJ)	com w/ BU re strategy for meeting and conferring w/ oc on outstanding discovery motions and class notice; case schedule		\$888.00	0.70		\$621.60				
11/23/2021	Travis Close (TCC)	Review and analyze notes by BMU/CJH re: further discovery issues and motions to compel		\$888.00	0.20		\$177.60				
11/23/2021	Guy Wallace (GBW)	legal research and analysis re standard for petitions pursuant to Rule 23(f)		\$1,188.00	1.20		\$1,425.60				
11/24/2021	Mark Johnson (MTJ)	call w/ C. Healey re content and manner of class notice, pending motions, data production and case schedule		\$888.00	1.30		\$1,154.40				
11/24/2021	Mark Johnson (MTJ)	draft class notice for publication and insertion in newsletters		\$888.00	1.00		\$888.00				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General Hrs	Fees	CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees	
11/24/2021	Mark Johnson (MTJ)	review and incorporate CH edits into long form class cert notice	\$888.00	0.40		\$355.20									
11/24/2021	Mark Johnson (MTJ)	work on proposed order approving form and manner of class notice	\$888.00	1.20		\$1,065.60									
11/24/2021	Mark Johnson (MTJ)	complete draft of proposed order re class notice.	\$888.00	1.60		\$1,420.80									
11/26/2021	Guy Wallace (GBW)	review and analysis of drafts of short form class notice; long form class notice; proposed Order re same	\$1,188.00	1.10		\$1,306.80									
11/29/2021	Mark Johnson (MTJ)	meet and confer w/ OC Gorman and BU re class notice and pending discovery motions.	\$888.00	0.80		\$710.40									
11/29/2021	Mark Johnson (MTJ)	call w/ GBW re results of meet and confer; pending motions and timing of same and possible production of assessment data, trial planning and readiness, possible motion for extension of expert discovery cutoff and other deadlines.	\$888.00	0.50		\$444.00									
11/29/2021	Mark Johnson (MTJ)	call w/ BU to plan for meet and confer session w/ OC re class notice and discovery motions	\$888.00	0.40		\$355.20									
11/29/2021	Guy Wallace (GBW)	com's with MTJ re status of D's production of staffing data; current schedule re expert disclosures; trial preparation	\$1,188.00	0.70		\$831.60									
11/29/2021	Guy Wallace (GBW)	revise and edit draft response from CJH re D's submission seeking to seal aspects of the class certification order	\$1,188.00	0.40		\$475.20									
11/30/2021	Philippe Gaudard (PMG)	Conferred with internal team re strategy.	775	0.10		\$77.50	0.1	\$77.50							
11/30/2021	Guy Wallace (GBW)	review and analysis of D's Rule 23(f) petition	\$1,188.00	1.80		\$2,138.40									
12/01/2021	Guy Wallace (GBW)	review and analysis of D's Rule 23(f) petition	\$1,188.00	2.50		\$2,970.00									
12/01/2021	Travis Close (TCC)	Review and analyze TransUnion case, and language re: risk of future harm, cited in Def's appeal brief	\$888.00	0.40		\$355.20									
12/01/2021	Travis Close (TCC)	Review and analyze Defendants' rule 23(f) appeal	\$888.00	0.80		\$710.40									
12/01/2021	Guy Wallace (GBW)	com's with CJH re D's Rule 23(f) petition for review and preparation of opposition re same; analysis of arguments	\$1,188.00	0.90		\$1,069.20									
12/01/2021	Mark Johnson (MTJ)	call w/ GBW re 23f petition, case schedule	\$888.00	0.50		\$444.00									
12/02/2021	Guy Wallace (GBW)	com's with CJH re amicus brief from Chamber of Commerce	\$1,188.00	0.30		\$356.40									
12/02/2021	Mark Johnson (MTJ)	call w/ GBW re issue of production of Aegis appendix 17 for Flores depo	\$888.00	0.10		\$88.80									
12/04/2021	Guy Wallace (GBW)	review and analysis of D's Rule 23(f) petition re fees and injury; alleged variability of staffing methodology; "persuasiveness" of expert evidence; District Court opinion re same	\$1,188.00	3.90		\$4,633.20									
12/05/2021	Guy Wallace (GBW)	outline of statement of the case, statement of facts re response to D's Rule 23(f) petition	\$1,188.00	3.30		\$3,920.40									
12/05/2021	Guy Wallace (GBW)	preparation and drafting of procedural history and summary of district court opinion re class certification for response to D's Rule 23(f) petition	\$1,188.00	3.20		\$3,801.60									
12/06/2021	Guy Wallace (GBW)	preparation and drafting of statement of facts, summary of district court opinion for response to D's Rule 23(f) petition	\$1,188.00	5.10		\$6,058.80									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/06/2021	Guy Wallace (GBW)	com's with CJH; MTJ re preparation of response to D's Rule 23(f) petition	\$1,188.00	0.50		\$594.00								
12/06/2021	Mark Johnson (MTJ)	call w/ GBW re opposition to Rule 23(f) petition	\$888.00	0.20		\$177.60								
12/06/2021	Mark Johnson (MTJ)	pull docs and citations for Rule 23(f) petition	\$888.00	0.20		\$177.60								
12/07/2021	Mark Johnson (MTJ)	review amicus brief on Rule 23(f) petition	\$888.00	0.30		\$266.40								
12/07/2021	Guy Wallace (GBW)	review and analysis of amicus brief from Chamber of Commerce	\$1,188.00	2.60		\$3,088.80								
12/07/2021	Guy Wallace (GBW)	com's with CJH re same and issues re ultimate merits	\$1,188.00	0.20		\$237.60								
12/07/2021	Guy Wallace (GBW)	preparation and drafting of short discussion re ultimate merits and distinction between same and Article III standing and issues appropriate for review under Rule 23(f)	\$1,188.00	0.50		\$594.00								
12/07/2021	Guy Wallace (GBW)	review and analysis of integrated draft of response to D's Rule 23(f) petition	\$1,188.00	1.20		\$1,425.60								
12/08/2021	Guy Wallace (GBW)	revise and edit draft opposition to D's Rule 23(f) petition	\$1,188.00	4.90		\$5,821.20								
12/08/2021	Guy Wallace (GBW)	com's with CJH re introduction to opposition to petition for review; revisions to draft of opposition	\$1,188.00	0.40		\$475.20								
12/08/2021	Mark Johnson (MTJ)	meet and confer w/ OC Gorman and BU re class notice and class list	\$888.00	0.50		\$444.00								
12/09/2021	Mark Johnson (MTJ)	meet and confer call with OC Jacobsen and Riley and COC Umpierre re responses to 6th set of document requests	\$888.00	1.10		\$976.80								
12/09/2021	Mark Johnson (MTJ)	review and provide comments re P position on D redline of draft long form notice	\$888.00	1.50		\$1,332.00								
12/09/2021	Mark Johnson (MTJ)	email exchanges w /BU and CH re position on class notices and comments on redline reflecting P positions, position on publication	\$888.00	0.30		\$266.40								
12/09/2021	Guy Wallace (GBW)	revise and edit further draft of opposition to D's Rule 23(f) petition	\$1,188.00	1.40		\$1,663.20								
12/10/2021	Kelle Winter (KJW)	Received and reviewed email from GBW requesting filing of opposition to petition.	450	0.10		\$45.00		0.1		\$45.00				
12/10/2021	Kelle Winter (KJW)	Reviewed, and revised opposition to petition; email correspondence with GBW regarding signature page; finalized opposition and electronically filed with the Court; emailed to all counsel of record; emailed TBS to arrange for mailing to all parties.	450	1.20		\$540.00		1.2		\$540.00				
12/10/2021	Guy Wallace (GBW)	revise and edit further draft of opposition to D's Rule 23(f) petition, including preparation of redline of same	\$1,188.00	1.10		\$1,306.80								
12/10/2021	Guy Wallace (GBW)	revise and edit final draft of opposition to D's petition for review	\$1,188.00	1.00		\$1,188.00								
12/10/2021	Guy Wallace (GBW)	com's with CJH; TBS re same	\$1,188.00	0.20		\$237.60								
12/10/2021	Mark Johnson (MTJ)	call w/ C Healey re strategy for conferring w/ OC re class notice and distribution plan, redline of D's revised version of long form notice	\$888.00	0.20		\$177.60								
12/10/2021	Mark Johnson (MTJ)	call w/ BU to plan for conference with OC re form of class notice and plan for dissemination	\$888.00	0.30		\$266.40								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs		Hrs		Hrs		Hrs	
12/10/2021	Mark Johnson (MTJ)	conference w/ OC Gorman and COC Umpierre to review and attempt to resolve disputes re revised version of draft long form class notice, plan for dissemination of notice, submission to court re same	\$888.00	2.20		\$1,953.60								
12/10/2021	Mark Johnson (MTJ)	call w/ COC BU to follow up on call w/ OC Gorman re class notice and submission to court, discussing possible compromise position and next steps	\$888.00	0.50		\$444.00								
12/10/2021	Mark Johnson (MTJ)	call w/ COC Umpierre and Healey re status of negotiations w/ COC over form of class notice and dissemination plan, submission to court re same	\$888.00	0.20		\$177.60								
12/10/2021	Mark Johnson (MTJ)	further call w/ COC BU re positions on form of class notice, submission to court, possible compromise position	\$888.00	0.40		\$355.20								
12/10/2021	Mark Johnson (MTJ)	review emails and revised versions of joint statement to court re class notice and offer edits re same	\$888.00	0.30		\$266.40								
12/10/2021	Mark Johnson (MTJ)	email exchange w/ COC re positions on form and dissemination of notice and issue of publication and notice to non class members	\$888.00	0.20		\$177.60								
12/12/2021	Guy Wallace (GBW)	analysis of major tasks for trial preparation and impact of D's failed Daubert motions against P's experts	\$1,188.00	0.50		\$594.00								
12/14/2021	Travis Close (TCC)	Review and analyze appellee's opposition to rule 23(f) motion	\$888.00	0.70		\$621.60								
12/14/2021	Travis Close (TCC)	Review and chamber of commerce's amicus brief iso rule 23(f) motion	\$888.00	0.40		\$355.20								
12/14/2021	Guy Wallace (GBW)	review and analysis of draft trial prep memo from CJH	\$1,188.00	1.40		\$1,663.20								
12/15/2021	Travis Close (TCC)	Review and analyze Ps' motion for additional depositions; Ds' opposition and attendant decs from Joseph Gorman and Brian Umpierre	\$888.00	0.40		\$355.20								
12/16/2021	Guy Wallace (GBW)	prepare for and participate in tc with CJH; DTM; JT; MT; BU re trial preparation	\$1,188.00	1.90		\$2,257.20								
12/17/2021	Guy Wallace (GBW)	com's with MTJ re trial preparation and discovery issues	\$1,188.00	0.50		\$594.00								
12/17/2021	Guy Wallace (GBW)	com's with CJH; DTM; JT; BU re sample of data for staffing analysis	\$1,188.00	0.90		\$1,069.20								
12/17/2021	Mark Johnson (MTJ)	call w/ GBW re trial planning and case schedule	\$888.00	0.30		\$266.40								
12/18/2021	Guy Wallace (GBW)	review and analysis of D's proposed reply brief re Rule 23(f) petition	\$1,188.00	0.80		\$950.40								
12/18/2021	Guy Wallace (GBW)	revise and edit draft of supplemental brief re further discovery	\$1,188.00	0.50		\$594.00								
12/18/2021	Guy Wallace (GBW)	com's with CJH; BU; MTJ re same	\$1,188.00	0.20		\$237.60								
12/20/2021	Travis Close (TCC)	Review and analyze Def's motion for leave to file 23(f) reply	\$888.00	0.50		\$444.00								
12/20/2021	Guy Wallace (GBW)	com's with CJH; BU; MTJ re class notice	\$1,188.00	0.40		\$475.20								
12/20/2021	Mark Johnson (MTJ)	call w/ BU re position and strategy on outstanding issues pertaining to class notice, proposed order re same, notice to non-class members, order precluding D from communicating with class members	\$888.00	0.90		\$799.20								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
12/20/2021	Mark Johnson (MTJ)	call w/ COC BU and OC Gorman re class notice and proposed order / joint stipulation, outstanding issues re same	\$888.00	0.30							
12/20/2021	Mark Johnson (MTJ)	follow up call w/ BU re D's position on class notice, class list, revisions to notice and proposed order, strategy for further revisions and negotiations w/ OC Gorman	\$888.00	1.00							
12/20/2021	Mark Johnson (MTJ)	review email from OC Gorman re class notice and related issues	\$888.00	0.10							
12/20/2021	Mark Johnson (MTJ)	call w/ COC BU re same and proposed response	\$888.00	0.10							
12/20/2021	Mark Johnson (MTJ)	review redline from OC of proposed order and proposed joint stipulation and explanatory emails stating D's position	\$888.00	0.30							
12/20/2021	Mark Johnson (MTJ)	call w/ BU re D's revisions to proposed order on class notice and joint stipulation and proposed response re same	\$888.00	0.40							
12/20/2021	Mark Johnson (MTJ)	further call w/ OC Gorman and COC BU re proposed order and stipulation, negotiation re same on issues of w/o prejudice to supp notice, challenge to class list and no-contact order	\$888.00	1.00							
12/22/2021	Guy Wallace (GBW)	com's with MTJ re pretrial schedule and implications of current expert report deadline	\$1,188.00	0.40							
12/29/2021	Gabriel Hemphill (GCH)	Review D's COA Writ and Exhibits	690	0.70	\$483.00	0.7	\$483.00				
12/30/2021	Nicole Shoener (NXS)	Research on a number of depositions for a PMQ allowed	450	0.60	\$270.00	0.6	\$270.00				
12/30/2021	Nicole Shoener (NXS)	Research on whether OPC is entitled to name the place of production as their office	450	0.60	\$270.00	0.6	\$270.00				
12/30/2021	Nicole Shoener (NXS)	email (same thread) to and from ELB on research on both (1) number of PMQ depositions and (2) party entitled to name place of production for RFP - internal memo and response	450	0.70	\$315.00	0.7	\$315.00				
12/30/2021	Nicole Shoener (NXS)	Additional edits on MTC Dep of PMQ memo	450	0.80	\$360.00	0.8	\$360.00				
01/06/2022	Michael Garcia (MEG)	F/U call with ELB and SQP re Heredia TSM.	325	1.50	\$487.50	1.5	\$487.50				
01/06/2022	Mark Johnson (MTJ)	review tentative ruling on discovery motions from Judge Guilford	\$888.00	0.20	\$177.60						
01/06/2022	Mark Johnson (MTJ)	com w/ BU re hearing	\$888.00	0.20	\$177.60						
01/06/2022	Guy Wallace (GBW)	review and analysis of tentative ruling re discovery issues from Special Master	\$1,188.00	0.40	\$475.20						
01/06/2022	Guy Wallace (GBW)	com's with CJH; BU re same	\$1,188.00	0.20	\$237.60						
01/07/2022	Brian Lee (BGL)	Strategy call with ELB re: next steps	\$825.00	0.60	\$495.00	0.6	\$495.00				
01/07/2022	Guy Wallace (GBW)	review and analysis of summary of discovery hearing with Special Master	\$1,188.00	0.40	\$475.20						
01/07/2022	Guy Wallace (GBW)	com's with MTJ re same and case schedule	\$1,188.00	0.20	\$237.60						
01/10/2022	Guy Wallace (GBW)	review and analysis of com's from CJH; BU re summary of proceedings with Special Master and next steps re same	\$1,188.00	0.30	\$356.40						
01/11/2022	Travis Close (TCC)	Review and analyze court's minutes re: unsealing of order granting class cert	\$888.00	0.20	\$177.60						
01/11/2022	Travis Close (TCC)	Review and analyze preliminary class list produced by defendants	\$888.00	0.30	\$266.40						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs		Hrs		Hrs		Hrs		
01/12/2022	Travis Close (TCC)	Review and analyze court's order re: proposed form and manner of notice to class	\$888.00	0.20		\$177.60									
01/12/2022	Travis Close (TCC)	Review and analyze defendants' notice of authority pursuant to FRAP Rule 28(j)	\$888.00	0.30		\$266.40									
01/12/2022	Guy Wallace (GBW)	review and analysis of D's FRAP 28(j) letter	\$1,188.00	0.10		\$118.80									
01/12/2022	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20		\$237.60									
01/12/2022	Guy Wallace (GBW)	review and analysis of draft jury instruction re representative proof	\$1,188.00	0.60		\$712.80									
01/12/2022	Guy Wallace (GBW)	prepare for and participate in zoom with CJH; DTM; JT; MT; BU re trial preparation	\$1,188.00	1.60		\$1,900.80			1.6		1,900.80				
01/13/2022	Guy Wallace (GBW)	analysis of and com's with CJH re discovery re class member resident files and Belaire-West type option to opt out re same	\$1,188.00	0.50		\$594.00									
01/25/2022	Guy Wallace (GBW)	review and analysis of proposed case schedule from CJH	\$1,188.00	0.20		\$237.60									
01/25/2022	Guy Wallace (GBW)	com's with co-counsel re same	\$1,188.00	0.20		\$237.60									
01/26/2022	Brian Lee (BGL)	Research rest break case law	\$825.00	1.20		\$990.00	1.2		\$990.00						
01/26/2022	Rachel Steyer (RLS)	reviewing revised long form notice, proposed order, declaration of proposed notice administrator	\$775.00	0.50		\$387.50	0.5		\$387.50						
01/27/2022	Travis Close (TCC)	Review and analyze joint stip to amend scheduling order	\$888.00	0.20		\$177.60									
01/27/2022	Guy Wallace (GBW)	com's with CJH; MTJ re proposed schedule for case and draft stipulation re same	\$1,188.00	0.30		\$356.40									
01/31/2022	Guy Wallace (GBW)	preparation and drafting of section of motion re Slichta deposition	\$1,188.00	1.30		\$1,544.40									
01/31/2022	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20		\$237.60									
01/31/2022	Mark Johnson (MTJ)	call w/ BSU re motion to re-open discovery for Slichta depo	\$888.00	0.20		\$177.60									
01/31/2022	Mark Johnson (MTJ)	work on mtn to amend scheduling order to allow Slichta depo	\$888.00	7.00		\$6,216.00									
02/01/2022	Lourdes Castro (LEC)	Comms with GBW re filing	\$450.00	0.10		\$45.00	0.1		\$45.00						
02/01/2022	Lourdes Castro (LEC)	Reviewing and editing brief; rennung tables and fixing formatting before filing	\$450.00	3.90		\$1,755.00	3.9		\$1,755.00						
02/01/2022	Lourdes Castro (LEC)	comms with MTJ re filing and hearing date	\$450.00	0.30		\$135.00	0.3		\$135.00						
02/01/2022	Lourdes Castro (LEC)	finalizing and filing PLAINTIFFS' MOTION FOR AN ORDER AMENDING THE SCHEDULING ORDER TO PERMIT THE DEPOSITION OF JEFF SLICHTA AFTER THE DISCOVERY CUT-OFF.	\$450.00	0.80		\$360.00	0.8		\$360.00						
02/01/2022	Guy Wallace (GBW)	revise and edit draft motion re request to extent discovery cut off to depose Jeff Slichta	\$1,188.00	2.00		\$2,376.00									
02/01/2022	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20		\$237.60									
02/01/2022	Guy Wallace (GBW)	com's with CJH; BU; MTJ re motion to Judge Staton re deposition of Slichta; tentative decision re depositions from Discovery Master and implications thereof	\$1,188.00	0.60		\$712.80									
02/01/2022	Mark Johnson (MTJ)	preliminary review of D's motion for summary judgment	\$888.00	0.50		\$444.00									
02/02/2022	Rachel Steyer (RLS)	reviewing documents corresponding to defendants' filing of motion for summary judgment/adjudication	\$775.00	0.80		\$620.00	0.8		\$620.00						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
02/02/2022	Ashley Hermann (AZH)	locate pleading for NTC of WD; TW LEC & team re WD of a docket number; check code re procedure	\$450.00	0.40	\$180.00		0.4	\$180.00			
02/02/2022	Lourdes Castro (LEC)	Comms with helpdesk re filing	\$450.00	0.30	\$135.00		0.3	\$135.00			
02/02/2022	Lourdes Castro (LEC)	Comms with MTJ re filing	\$450.00	0.20	\$90.00		0.2	\$90.00			
02/02/2022	Lourdes Castro (LEC)	Comms with other paralegals re filing error	\$450.00	0.40	\$180.00		0.4	\$180.00			
02/02/2022	Lourdes Castro (LEC)	Researching re document filing error	\$450.00	0.40	\$180.00		0.4	\$180.00			
02/02/2022	Travis Close (TCC)	Review and analyze Ps' motion for an order amending schedule order + accompanying decs	\$888.00	0.40	\$355.20						
02/02/2022	Travis Close (TCC)	Review and analyze Def's motion for summary judgment and accompanying docs	\$888.00	0.70	\$621.60						
02/02/2022	Guy Wallace (GBW)	review and analysis of D's motion for summary judgment	\$1,188.00	0.60	\$712.80						
02/02/2022	Mark Johnson (MTJ)	emails w/ Staff re access to sealed docs from OC shared site, search for and reset password for same	\$888.00	0.30	\$266.40						
02/07/2022	Lourdes Castro (LEC)	Adding dates to CM	\$450.00	0.70	\$315.00		0.7	\$315.00			
02/07/2022	Guy Wallace (GBW)	review and analysis of Order from Judge Staton re case schedule	\$1,188.00	0.10	\$118.80						
02/07/2022	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20	\$237.60						
02/10/2022	Guy Wallace (GBW)	tc with CJH; KAS; DTM; MAY re class notice; depositions; class outreach	\$1,188.00	0.70	\$831.60						
02/10/2022	Guy Wallace (GBW)	legal research and analysis re attorney-client relationship with class members and whether it arises at time of class certification or only after the opt-out period expires	\$1,188.00	1.30	\$1,544.40						
02/11/2022	Frank Perez (FAP)	Search for good example of mx for leave to amend complaint.	\$800.00	0.60	\$480.00		0.6	\$480.00			
02/15/2022	Guy Wallace (GBW)	review and analysis of Defendants' further Rule 28(j) letter to Ninth Circuit	\$1,188.00	0.30	\$356.40						
02/15/2022	Travis Close (TCC)	Review and analyze ninth circuit decision shared by Def's counsel to Ninth Circuit in support of rule 28(j)	\$888.00	0.40	\$355.20						
02/17/2022	Guy Wallace (GBW)	legal research and analysis re attorney-client relationship between class counsel and members of the Plaintiff class and restrictions on defendants and their counsel arising from same	\$1,188.00	0.80	\$950.40						
02/22/2022	James Dion (JMD)	Document review - IndexingL SYH2702 - SYH2791.	\$850.00	2.40	\$2,040.00		2.4	\$2,040.00			
02/24/2022	Guy Wallace (GBW)	legal research and analysis re attorney-client relationship with absent class members	\$1,188.00	1.90	\$2,257.20						
02/24/2022	Guy Wallace (GBW)	preparation of short memo re applicable law re attorney-client relationship between class counsel and the members of the Plaintiff class	\$1,188.00	0.70	\$831.60						
02/25/2022	Guy Wallace (GBW)	preparation and drafting of memo regarding the attorney client relationship between class counsel and absent class members and the rules regarding communication re absent class members	\$1,188.00	2.10	\$2,494.80						
02/25/2022	Travis Close (TCC)	Review and analyze report and rec's from special master re: lay witness depos and motion to compel discovery	\$888.00	0.40	\$355.20						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions										
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees			
							Hrs		Hrs		Hrs		Hrs		Hrs		
03/29/2022	Travis Close (TCC)	Review and analyze court's orders re arbitration, approving class list, adopting report of special master [Dkt Nos. 561-564]	\$888.00	0.40		\$355.20											
04/01/2022	Travis Close (TCC)	Review and analyze final class notice submitted to court	\$888.00	0.20		\$177.60											
04/01/2022	Guy Wallace (GBW)	review and analysis of Ninth Circuit order granting Rule 23(f) petition	\$1,188.00	1.00		\$1,188.00											
04/01/2022	Guy Wallace (GBW)	com's with CJH; MTJ re same	\$1,188.00	0.20		\$237.60											
04/07/2022	Guy Wallace (GBW)	revise and edit opposition to Defendants' motion for stay pending completion of Rule 23(f) appeal	\$1,188.00	0.60		\$712.80											
04/08/2022	Travis Close (TCC)	Review and analyze Ds' ex parte motion to stay the case & attached exhibits and decs	\$888.00	0.50		\$444.00											
04/08/2022	Guy Wallace (GBW)	review and analysis of Ninth Circuit en banc decision in Olean	\$1,188.00	0.90		\$1,069.20											
04/08/2022	Guy Wallace (GBW)	com's with co-counsel re same	\$1,188.00	0.20		\$237.60											
04/20/2022	Guy Wallace (GBW)	com's with CJH re Ninth Circuit mediation conference and briefing schedule	\$1,188.00	0.40		\$475.20											
04/29/2022	Guy Wallace (GBW)	com's with Defendants re schedule on 23(f) appeal	\$1,188.00	0.20		\$237.60											
05/02/2022	Guy Wallace (GBW)	com's with CJH re schedule on appeal and issues presented	\$1,188.00	0.50		\$594.00											
05/02/2022	Guy Wallace (GBW)	com's with MTJ re same		0.20		\$0.00											
05/02/2022	Guy Wallace (GBW)	com's with Defendants' counsel; CJH re schedule on 23(f) appeal	\$1,188.00	0.40		\$475.20											
05/06/2022	Guy Wallace (GBW)	com's with CJH re 23(f) appeal and schedule re same; analysis of scope of answering brief	\$1,188.00	0.50		\$594.00											
05/09/2022	Silvia Carter (SGC)	Email to FrontDesk re wrong document saved in the wrong file.	\$450.00	0.10		\$45.00		0.1								\$45.00	
05/18/2022	Kelle Winter (KJW)	Correspondence with SGC regarding preparing documents for deposition for delivery.	\$450.00	0.10		\$45.00		0.1									\$45.00
07/14/2022	Guy Wallace (GBW)	com's with CJH re Olivier, planning for opposition, Ninth Circuit decision in Tailford and analysis of same	\$1,188.00	1.10		\$1,306.80											
07/14/2022	Guy Wallace (GBW)	com's with CJH; JAU re Tailford and potential arguments for Rule 23(f) appeal	\$1,188.00	0.90		\$1,069.20											
07/14/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Locate briefing re Rule 23(f) and class certification for review	\$888.00	0.40		\$355.20											
07/15/2022	Lourdes Castro (LEC)	checking folder re unredacted briefs	450	0.20		\$90.00		0.2									\$90.00
07/15/2022	Lourdes Castro (LEC)	Comms with JAU and RLS re checking folde re unredacted briefs	450	0.10		\$45.00		0.1									\$45.00
07/15/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Locate unredacted versions of Amended MCC briefing	\$888.00	0.20		\$177.60											
07/15/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	emails to RLS and LEC re same	\$888.00	0.20		\$177.60											
07/15/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review order denying class certification	\$888.00	0.30		\$266.40											
07/15/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Plaintiffs Amended Mtn. for Class Certification	\$888.00	0.90		\$799.20											

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions									
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees		
							Hrs		Hrs		Hrs		Hrs		Hrs	
07/15/2022	Guy Wallace (GBW)	review and analysis of com's with CJH re Plaintiffs' position and argument re TransUnion	\$1,188.00	0.50		\$594.00										
07/17/2022	Guy Wallace (GBW)	legal research and analysis re TransUnion and circuit decisions construing same	\$1,188.00	1.10		\$1,306.80										
07/18/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Read Opposition to P's MCC	\$888.00	0.30		\$266.40										
07/19/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Sunrise Opposition to Plaintiffs MCC	\$888.00	1.20		\$1,065.60										
07/20/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Finish reviewing Sunrise Opp. to Plaintiffs MCC	\$888.00	0.50		\$444.00										
07/20/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Plaintiffs' Reply iso MCC; email GBW re same	\$888.00	1.40		\$1,243.20										
07/20/2022	Guy Wallace (GBW)	legal research and analysis re Transunion v. Ramirez and Article III standing including injury in fact and concrete harm	\$1,188.00	1.60		\$1,900.80										
07/21/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Plaintiffs' Reply brief iso MCC	\$888.00	0.40		\$355.20										
07/21/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Sunrise Sur-Reply in Opp to Plaintiffs' MCC	\$888.00	1.00		\$888.00										
07/21/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Class Cert decision	\$888.00	0.90		\$799.20										
07/22/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Class Cert decision	\$888.00	0.50		\$444.00										
07/22/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Sunrise's 23(f) petition	\$888.00	1.00		\$888.00										
07/22/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Plaintiffs' Opposition to Sunrise's 23(f) petition	\$888.00	0.70		\$621.60										
07/22/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Sunrise' Reply to Rule 23(f) petition	\$888.00	0.20		\$177.60										
07/25/2022	Guy Wallace (GBW)	prepare for and participate in tc with CJH; Olivier re Rule 23(f) appeal	\$1,188.00	0.60		\$712.80										
07/27/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Spoke v. Robins SCOTUS decision	\$888.00	0.90		\$799.20										
07/27/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Read TransUnion decision	\$888.00	1.40		\$1,243.20										
07/27/2022	Guy Wallace (GBW)	com's with CJH re Defendants' arguments re Transunion and harm	\$1,188.00	0.50		\$594.00										
07/28/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Finish reviewing TransUnion decision	\$888.00	1.10		\$976.80										
07/29/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review 5th Circuit case re TransUnion	\$888.00	0.40		\$355.20										
07/29/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re TransUnion and appeal	\$888.00	0.40		\$355.20										
07/29/2022	Guy Wallace (GBW)	com's with JAU re Transunion and injury-in-fact test	\$1,188.00	0.60		\$712.80										
08/03/2022	Mark Johnson (MTJ)	review notification from court and CH email re change in appellate schedule and proposed coc on appeal	\$888.00	0.10		\$88.80										

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions					
				Worked			General	CC Confs	Falkenberg	Travel		
						Hrs	Fees	Hrs	Fees	Hrs	Fees	
08/04/2022	Silvia Carter (SGC)	Emails to/from FrontDesk re wrong document saved to Heredia/SYH. Reviewing unread emails in the CHC Team Calendar inbox to input deadlines/Reminders in CM: Email from CHC re Medation	450		0.10	\$45.00	0.1	\$45.00				
08/05/2022	Michael Garcia (MEG)	Added: 9/19/22 [TBD: Time] Mediation with Judge Pate 8/19/22 INTERNAL DL to request damages analysis report 9/12/22 INTERNAL DL to request fee & cost report ahead of 9/19/22 Mediation	325		0.20	\$65.00	0.2	\$65.00				
08/08/2022	Guy Wallace (GBW)	review and analysis of petition for certiorari filed in Olean com's with CJH; MO; RLS re same		\$1,188.00	1.60	\$1,900.80						
08/08/2022	Guy Wallace (GBW)			\$1,188.00	0.20	\$237.60						
08/09/2022	Lourdes Castro (LEC)	Comms with JAU re ECF notifications and docketbird	450		0.10	\$45.00	0.1	\$45.00				
08/09/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Read Brennon case re Unruh Civil Rights Act		\$888.00	1.20	\$1,065.60						
08/10/2022	Lourdes Castro (LEC)	Drafting NOA for JAU	450		0.50	\$225.00	0.5	\$225.00				
08/10/2022	Lourdes Castro (LEC)	Comms with JAU re NOA draft	450		0.10	\$45.00	0.1	\$45.00				
08/10/2022	Lourdes Castro (LEC)	Researching NOA for JAU in Court of Appeals 9th Circuit re ECF notifications	450		0.50	\$225.00	0.5	\$225.00				
08/10/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Finish reading Brennon		\$888.00	0.50	\$444.00						
08/10/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re brief and upcoming work		\$888.00	0.10	\$88.80						
08/12/2022	Lourdes Castro (LEC)	Reviewing and updating Draft NOA JAU comms with JAU re same	450		0.20	\$90.00	0.2	\$90.00				
08/15/2022	Lourdes Castro (LEC)	Checking CACD re admission for JAU; calling the court re same so we can file NOA on her behalf	450		0.40	\$180.00	0.4	\$180.00				
08/15/2022	Lourdes Castro (LEC)	Drafting NOA For JAU	450		0.30	\$135.00	0.3	\$135.00				
08/15/2022	Lourdes Castro (LEC)	Comms withTBS, GBW and JAU re unable to file NOA on her behalf	450		0.10	\$45.00	0.1	\$45.00				
08/16/2022	Lourdes Castro (LEC)	Finalizing and filing NOA JAU	450		0.60	\$270.00	0.6	\$270.00				
08/16/2022	Lourdes Castro (LEC)	Comms with the court ECF help desk re filing NOA for JAU	450		0.20	\$90.00	0.2	\$90.00				
08/16/2022	Lourdes Castro (LEC)	Comms with GBW and JAU re filing NOA	450		0.10	\$45.00	0.1	\$45.00				
08/17/2022	Lourdes Castro (LEC)	Checking ECF and adding email to it re notifications for JAU	450		0.40	\$180.00	0.4	\$180.00				
08/17/2022	Lourdes Castro (LEC)	Comms with JAU ecf notifications	450		0.10	\$45.00	0.1	\$45.00				
08/19/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re research assignments		\$888.00	0.40	\$355.20						
08/19/2022	Guy Wallace (GBW)	review and analysis of CJH memo re outline of issues raised on appeal		\$1,188.00	4.10	\$4,870.80						
08/19/2022	Guy Wallace (GBW)	com's with JAU re same (.5)		\$1,188.00	0.50	\$594.00						
08/19/2022	Guy Wallace (GBW)	legal research and analysis re violations of CLRA and concept of "benefit of the bargain"		\$1,188.00	1.20	\$1,425.60						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
08/20/2022	Guy Wallace (GBW)	legal research and analysis re injury in fact and requirements of Article III standing; overpayment; benefit of the bargain	\$1,188.00	1.60		\$1,900.80									
08/21/2022	Guy Wallace (GBW)	legal research and analysis re Transunion; injury-in-fact; overpayment	\$1,188.00	1.70		\$2,019.60									
08/21/2022	Guy Wallace (GBW)	preparation of core arguments and points re why the district court's class cert order should be affirmed	\$1,188.00	2.40		\$2,851.20									
08/23/2022	Guy Wallace (GBW)	preparation for and tc with CJH re Article III standing; viability of Plaintiffs' theory of misrepresentation and omission; commonality and predominance	\$1,188.00	1.30		\$1,544.40									
08/25/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Read Fleming in light of TransUnion	\$888.00	0.80		\$710.40									
08/25/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Email to GBW re Fleming	\$888.00	0.10		\$88.80									
08/25/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review research assignment for appeal	\$888.00	0.30		\$266.40									
08/26/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Read Hinojos v. Kohls	\$888.00	0.70		\$621.60									
08/26/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Read Maya v. Centex	\$888.00	0.50		\$444.00									
08/26/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Shepardize Hinojos to find applicable cases since 2013	\$888.00	0.50		\$444.00									
08/27/2022	Guy Wallace (GBW)	legal research and analysis re TransUnion and cases citing same re Article III standing; application of Article III to the name Plaintiffs	\$1,188.00	1.80		\$2,138.40									
08/28/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research common proof of IIF	\$888.00	1.00		\$888.00									
08/29/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research common proof of IIF	\$888.00	1.10		\$976.80									
08/29/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research common proof of IIF	\$888.00	1.40		\$1,243.20									
08/30/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research common proof of IIF	\$888.00	2.10		\$1,864.80									
08/31/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re benefit of the bargain	\$888.00	0.20		\$177.60									
08/31/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research common proof of IIF	\$888.00	2.30		\$2,042.40									
08/31/2022	Travis Close (TCC)	Email to GBW re: benefit of the bargain in context of consumer/fraud assisted living cases	\$888.00	0.20		\$177.60									
08/31/2022	Guy Wallace (GBW)	legal research and analysis re claims for promissory fraud and comparison to claims under CLRA and UCL for false or misleading statements or omissions	\$1,188.00	1.30		\$1,544.40									
09/01/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research common proof of IIF	\$888.00	1.70		\$1,509.60									
09/01/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	finalize summaries of same	\$888.00	1.00		\$888.00									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
09/01/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	email same to GBW	\$888.00	0.20							
09/01/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review next research assignment - cases where there is IIF in "risk of future harm" situation post-TransUnion	\$888.00	0.20							
09/02/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research post-TransUnion cases that find risk of future injury sufficient IIF	\$888.00	3.40			\$3,019.20				
09/06/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Emails to GBW re IIF cases	\$888.00	0.10			\$88.80				
09/06/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research IIF involving risk of injury post TransUnion	\$888.00	2.00			\$1,776.00				
09/07/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research risk of future harm constituting IIF post-TransUnion	\$888.00	2.70			\$2,397.60				
09/07/2022	Guy Wallace (GBW)	com's with Defendants; CJH re schedule and amicus briefing	\$1,188.00	0.30			\$356.40				
09/07/2022	Guy Wallace (GBW)	legal research and analysis re IIF and threat or risk of harm	\$1,188.00	1.20			\$1,425.60				
09/08/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research whether payment of money coupled with risk of not receiving promised services is IIF post-TransUnion	\$888.00	1.30			\$1,154.40				
09/09/2022	Guy Wallace (GBW)	review and analysis of Defendants' opening brief	\$1,188.00	2.50			\$2,970.00				
09/09/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Edit summary of research re risk of future injury is IIF	\$888.00	0.60			\$532.80				
09/09/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research cases where risk of future harm is sufficient for IIF post-TransUnion	\$888.00	2.50			\$2,220.00				
09/10/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re appeal filing	\$888.00	0.10			\$88.80				
09/10/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW, MTJ and co-counsel re call scheduling re appeal	\$888.00	0.10			\$88.80		0.1		88.8
09/10/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Locate EOR on DocketBird to upload to One Drive for M. Olivier	\$888.00	0.10			\$88.80				
09/10/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	com's with GBW and MTJ re same	\$888.00	0.20			\$177.60				
09/10/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Print copy of AOB	\$888.00	0.10			\$88.80				
09/10/2022	Guy Wallace (GBW)	review and analysis of Defendants' opening brief	\$1,188.00	2.70			\$3,207.60				
09/10/2022	Guy Wallace (GBW)	legal research and analysis re Transunion decision	\$1,188.00	1.00			\$1,188.00				
09/10/2022	Mark Johnson (MTJ)	preliminary review of Sunrise Rule 23f opening brief	\$888.00	0.50			\$444.00				
09/10/2022	Mark Johnson (MTJ)	coms w/ GBW re same	\$888.00	0.20			\$177.60				
09/11/2022	Guy Wallace (GBW)	review and analysis of Defendants' opening brief and legal authorities cited therein	\$1,188.00	3.40			\$4,039.20				
09/11/2022	Mark Johnson (MTJ)	review and analyze Sunrise's 23f opening brief	\$888.00	1.50			\$1,332.00				
09/12/2022	Lourdes Castro (LEC)	Adding GBW's e-Signature to Consulting Agreement re appeal 450		0.30			\$135.00		0.3		\$135.00
09/12/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Read AOB; look up and read various cited cases	\$888.00	4.00			\$3,552.00				
09/12/2022	Guy Wallace (GBW)	review and analysis of Defendants' opening brief	\$1,188.00	3.60			\$4,276.80				
09/12/2022	Guy Wallace (GBW)	com's with BU; MT; JAU re same	\$1,188.00	0.20			\$237.60				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs		Hrs		Hrs		Hrs		
09/13/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Finalize research re risk of injury and IIF	\$888.00	2.20		\$1,953.60									
09/13/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	email same to C. Healey and GBW	\$888.00	0.20		\$177.60									
09/13/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re call with co-counsel	\$888.00	0.20		\$177.60									
09/13/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Zoom meeting with GBW, MTJ and co-counsel re response brief	\$888.00	1.10		\$976.80			1.1		976.8				
09/13/2022	Mark Johnson (MTJ)	zoom meeting with appellate counsel CH, GBW, BU, MO, re D opening 23f brief, dominant issues, strategy, research to be undertaken, assignments	\$888.00	1.10		\$976.80									
09/13/2022	Guy Wallace (GBW)	review and analysis of district court order granting class certification and Defendants' statement of facts from AOB	\$1,188.00	2.40		\$2,851.20									
09/13/2022	Guy Wallace (GBW)	com's with co-counsel re same	\$1,188.00	0.20		\$237.60									
09/13/2022	Guy Wallace (GBW)	zoom with CJH; MO; BU; MTJ; JAU re Defendants' opening brief and preparation of answer thereto	\$1,188.00	0.80		\$950.40									
09/13/2022	Guy Wallace (GBW)	com's with MTJ; JAU re Defendants' opening brief and counter arguments re same	\$1,188.00	0.70		\$831.60									
09/13/2022	Guy Wallace (GBW)	legal research and analysis re Defendants' contention that injury-in-fact requires a showing the all class members have a right to recover	\$1,188.00	1.10		\$1,306.80									
09/13/2022	Guy Wallace (GBW)	analysis of cases showing that standing and the ultimate merits are distinct legal issues	\$1,188.00	1.00											
09/14/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research traditional / common law analog that seller's failure to disclose lack of capacity to deliver is actionable	\$888.00	3.90		\$3,463.20									
09/14/2022	Guy Wallace (GBW)	analysis of Plaintiffs' alleged "injury-in-fact" and the definition of same	\$1,188.00	1.30		\$1,544.40									
09/14/2022	Guy Wallace (GBW)	com's with MTJ; MO re same	\$1,188.00	0.20		\$237.60									
09/14/2022	Guy Wallace (GBW)	review and analysis of Defendants' statement of facts in AOB	\$1,188.00	2.80		\$3,326.40									
09/14/2022	Guy Wallace (GBW)	comparison to findings in district court's Order and to fact record set forth in Plaintiffs' district court briefs and Rule 23(f) opposition brief	\$1,188.00	1.00		\$1,188.00									
09/15/2022	Lourdes Castro (LEC)	Printing documents and sending them to GBW via FedEx	450	3.20		\$1,440.00			3.2		\$1,440.00				
09/15/2022	Lourdes Castro (LEC)	Comms with GBW re printing documents and sending them to his house	450	0.10		\$45.00			0.1		\$45.00				
09/15/2022	Guy Wallace (GBW)	legal research and analysis re Olean and Ninth Circuit standards re class certification	\$1,188.00	1.10		\$1,306.80									
09/15/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review emails from GBW and MTJ re appeal	\$888.00	0.10		\$88.80									
09/15/2022	Guy Wallace (GBW)	review and analysis of Sunrise's arguments re Ellis v. CostCo and the persuasiveness of Plaintiffs' expert testimony	\$1,188.00	1.80		\$2,138.40									
09/15/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research cases on common law/ traditional recognition that seller's failure to disclose lack of capacity to deliver on a future promise is actionable	\$888.00	4.00		\$3,552.00									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
09/15/2022	Guy Wallace (GBW)	review and analysis of Defendants' argument that class members were exposed to disparate sources of information regarding Sunrise	\$1,188.00	1.40							
09/15/2022	Guy Wallace (GBW)	legal research and analysis re same	\$1,188.00	1.00							
09/15/2022	Guy Wallace (GBW)	com's with MTJ re same (.3)	\$1,188.00	0.30							
09/15/2022	Guy Wallace (GBW)	review and analysis of CJH memo re outline of potential appellate arguments	\$1,188.00	1.30							
09/15/2022	Guy Wallace (GBW)	review and analysis of draft opposition to Defendants' motion to seal materials in the Ninth Circuit	\$1,188.00	0.20							
09/15/2022	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20							
09/15/2022	Mark Johnson (MTJ)	call w/ GBW re trial court's class cert findings and comparison to D characterization in opening brief, strategy for characterizing nature of injury for standing purposes, other issues.	\$888.00	0.80							
09/16/2022	Lourdes Castro (LEC)	Finalizing and filing Opp to Appealants Motion to Mantain Documents under seal	450	0.40			0.4	\$180.00			
09/16/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research harms with a close relationship to harms traditionally recognized in American courts	\$888.00	2.90							
09/16/2022	Guy Wallace (GBW)	preparation and drafting of excerpts of useful findings from Judge Staton's class certification decision	\$1,188.00	2.20							
09/16/2022	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20							
09/16/2022	Mark Johnson (MTJ)	review memo from GBW setting forth favorable findings from district court order	\$888.00	0.20							
09/16/2022	Mark Johnson (MTJ)	confer w / GBW re same	\$888.00	0.20							
09/19/2022	Guy Wallace (GBW)	com's with JAU re legal research re historical roots of promissory fraud claims	\$1,188.00	0.30							
09/19/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re research project & appeal	\$888.00	0.20							
09/19/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research common law / traditional recognition of promissory estoppel	\$888.00	2.60							
09/19/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	write case summaries re same	\$888.00	1.00							
09/20/2022	Guy Wallace (GBW)	review and analysis of Defendants' opening brief; amicus brief from American Seniors Housing, et al.	\$1,188.00	3.60							
09/20/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research promissory fraud and the common law	\$888.00	1.50							
09/20/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	write up summaries of research	\$888.00	0.50							
09/20/2022	Mark Johnson (MTJ)	review and analyze Chamber of Commerce amicus brief	\$888.00	0.70							
09/20/2022	Mark Johnson (MTJ)	review and analysis of Assisted Living Assn's Amicus briefs	\$888.00	1.00							
09/20/2022	Mark Johnson (MTJ)	calls w GBW re issues raised by amicus briefs and strategy for responding to same.	\$888.00	0.80							
09/20/2022	Mark Johnson (MTJ)	review GBW revised version of district court's findings	\$888.00	0.40							
09/20/2022	Guy Wallace (GBW)	review and analysis of Amicus Brief filed by American Seniors Housing and California Assisted Living Association	\$1,188.00	2.10							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs		Hrs		Hrs		Hrs	
09/21/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research common law fraudulent inducement	\$888.00	2.00		\$1,776.00								
09/21/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	write up research summaries of same	\$888.00	1.00		\$888.00								
09/21/2022	Guy Wallace (GBW)	review and analysis of amicus briefs submitted by the Chamber of Commerce and the American Seniors Housing Association et al.	\$1,188.00	3.60		\$4,276.80								
09/21/2022	Guy Wallace (GBW)	com's with JRA; MTJ re same and analysis of standing and the merits	\$1,188.00	0.20		\$237.60								
09/21/2022	Guy Wallace (GBW)	preparation of summary of Plaintiffs' claims and key points re class certification and Article III injury; responses to Defendants' main arguments	\$1,188.00	2.40		\$2,851.20								
09/21/2022	Mark Johnson (MTJ)	call w/ GBW re issues raised by amicus briefs and strategy for responding to same	\$888.00	0.50		\$444.00								
09/21/2022	Mark Johnson (MTJ)	call w/ GBW re arguments in moving papers and reply re harm, addressing D's arguments re lack of harm	\$888.00	0.60		\$532.80								
09/22/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research fraudulent inducement, fraudulent concealment	\$888.00	2.40		\$2,131.20								
09/22/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	write up results of same	\$888.00	1.00		\$888.00								
09/22/2022	Travis Close (TCC)	Call with GBW re: assignments for next week in planning response to Def's opening brief	\$888.00	0.80		\$710.40								
09/22/2022	Guy Wallace (GBW)	legal research and analysis re Defendants' argument re class members receiving allegedly disparate information and Ninth Circuit and district court cases re same	\$1,188.00	1.70		\$2,019.60								
09/22/2022	Guy Wallace (GBW)	com's with BU; MTJ re ramifications of understaffing for the class members	\$1,188.00	0.50		\$594.00								
09/22/2022	Guy Wallace (GBW)	analysis of Defendants' main arguments and Plaintiffs' potential responses thereto	\$1,188.00	2.10		\$2,494.80								
09/22/2022	Mark Johnson (MTJ)	call w/ GBW re response to D argument in AOB re no harm to residents; equitable issues	\$888.00	0.40		\$355.20								
09/23/2022	Travis Close (TCC)	Research standing requirement in Olean (9th cir) case	\$888.00	0.80		\$710.40								
09/23/2022	Travis Close (TCC)	Review and analyze draft of Ps' opposition to appellants' motion to maintain docs under seal	\$888.00	0.50		\$444.00								
09/23/2022	Travis Close (TCC)	Review and analyze Defendants' opening appellate brief	\$888.00	1.70		\$1,509.60								
09/23/2022	Travis Close (TCC)	Compare/contrast damages model us ed in Reitman v. Chamion cited in Def's opening brief with that of Kennedy's damages model	\$888.00	0.90		\$799.20								
09/23/2022	Travis Close (TCC)	Legal research re: requirement for damages models under Pulaski, Reitman, and other cases cited in Def's opening brief	\$888.00	1.40		\$1,243.20								
09/23/2022	Travis Close (TCC)	Review and analyze US Chamber of Commerce's amicus curiae opening brief	\$888.00	0.80		\$710.40								
09/23/2022	Mark Johnson (MTJ)	work on preparaton of analhysis of alleged facts and citations in AOB	\$888.00	2.00		\$1,776.00								
09/23/2022	Mark Johnson (MTJ)	review D reply iso of motion to seal ER	\$888.00	0.50		\$444.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
09/23/2022	Mark Johnson (MTJ)	continue preparing written analysis of alleged facts and supporting citations from AOB	\$888.00	2.40		\$2,131.20									
09/23/2022	Mark Johnson (MTJ)	call w/ GBW re argument strategy on appeal re evidence and argument on harm, standing, materiality, declarations of residents, Flores declaration	\$888.00	1.30		\$1,154.40									
09/23/2022	Mark Johnson (MTJ)	calls x2 w GBW re theory of harm, D's position, omission, other sources of information.	\$888.00	0.50		\$444.00									
09/23/2022	Guy Wallace (GBW)	analysis of Plaintiffs' liability theory under the CLRA and the UCL; harm issues; common proofs	\$1,188.00	1.50		\$1,782.00									
09/23/2022	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20		\$237.60									
09/23/2022	Guy Wallace (GBW)	com's with BU re evidence of understaffing and consequences of same for class members	\$1,188.00	0.40		\$475.20									
09/23/2022	Guy Wallace (GBW)	analysis of declaration of Dr. Flores and evidence of Defendants' understaffing	\$1,188.00	1.30		\$1,544.40									
09/23/2022	Guy Wallace (GBW)	preparation and drafting of section re Plaintiffs' theory or recovery and story	\$1,188.00	1.00		\$1,188.00									
09/23/2022	Guy Wallace (GBW)	legal research and analysis re recent Ninth Circuit and district court decisions applying Transunion	\$1,188.00	1.20		\$1,425.60									
09/24/2022	Guy Wallace (GBW)	preparation and drafting of synopsis of Plaintiffs' theory and claims and key flaws in Defendants' counterarguments re the district court's class certification argument	\$1,188.00	3.10		\$3,682.80									
09/24/2022	Mark Johnson (MTJ)	calls (x4) w/ GBW re theming / intro for response brief, edits to 2 page draft of Ps "story)	\$888.00	0.40		\$355.20									
09/24/2022	Mark Johnson (MTJ)	edit draft intro/summary of Ps argument from GBW	\$888.00	0.50		\$444.00									
09/24/2022	Mark Johnson (MTJ)	email exchanges re same	\$888.00	0.20		\$177.60									
09/25/2022	Mark Johnson (MTJ)	continue reviewing and analyzing/summarizing portions of EOR cited by Sunrise in AOB	\$888.00	1.00		\$888.00									
09/26/2022	Guy Wallace (GBW)	revise and edit short summary of Plaintiffs' claims and response to Defendants' key arguments	\$1,188.00	2.40		\$2,851.20									
09/26/2022	Guy Wallace (GBW)	com's with CJH; MTJ re same	\$1,188.00	0.20		\$237.60									
09/26/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research fraudulent concealment and fraud in the inducement	\$888.00	2.50		\$2,220.00									
09/26/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	take notes on results of same	\$888.00	0.50		\$444.00									
09/26/2022	Mark Johnson (MTJ)	continue review of evidence cited by D in AOB on 23f review and preparing summary of same	\$888.00	2.70		\$2,397.60									
09/26/2022	Mark Johnson (MTJ)	review and compare EOR to docket and identify docket entries selected by D's in EOR	\$888.00	1.40		\$1,243.20									
09/26/2022	Mark Johnson (MTJ)	email to COC re same	\$888.00	0.20		\$177.60									
09/26/2022	Mark Johnson (MTJ)	call w/ GBW re strategy for addressing risk of harm issue	\$888.00	0.20		\$177.60									
09/26/2022	Guy Wallace (GBW)	preparation of outline of section of AAB re expert testimony	\$1,188.00	1.40		\$1,663.20									
09/27/2022	Guy Wallace (GBW)	review and analysis of Defendants' arguments re Dr. Flores	\$1,188.00	1.30		\$1,544.40									
09/27/2022	Guy Wallace (GBW)	preparation of counterarguments and points	\$1,188.00	1.00		\$1,188.00									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
09/27/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research fraud in the inducement, fraud, and fraudulent misrepresentation	\$888.00	1.70		\$1,509.60								
09/27/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	write up summaries re same	\$888.00	0.50		\$444.00								
09/27/2022	Guy Wallace (GBW)	review and analysis of Defendants' arguments re Dr. Flores	\$1,188.00	2.80		\$3,326.40								
09/27/2022	Guy Wallace (GBW)	review and analysis of Plaintiffs' opposition to Defendants' motion in the district court to strike the Declaration of Dr. Flores	\$1,188.00	0.50		\$594.00								
09/27/2022	Guy Wallace (GBW)	review and analysis of class cert briefing in the district court and sections re impact of understaffing on class members	\$1,188.00	1.00		\$1,188.00								
09/27/2022	Guy Wallace (GBW)	com's with BU; MTJ re same	\$1,188.00	0.20		\$237.60								
09/27/2022	Mark Johnson (MTJ)	continue reviewing declarations and other evidence cited by Ds in AOB and working on summary of same.	\$888.00	4.70		\$4,173.60								
09/27/2022	Mark Johnson (MTJ)	calls (x3) and emails w/ GBW re D's happy camper declarations and strategy for addressing same, DSS citation evidence, prior briefing.	\$888.00	0.70		\$621.60								
09/27/2022	Mark Johnson (MTJ)	continue reviewing declaration and other evidence cited by D in AOB on 23f and preparing summary of same	\$888.00	2.30		\$2,042.40								
09/28/2022	Rachel Steyer (RLS)	preparing beginnings of declarant spreadsheet	775	0.40		\$310.00	0.4	\$310.00						
09/28/2022	Rachel Steyer (RLS)	reviewing part of defendant's argument in 23f brief	775	0.40		\$310.00	0.4	\$310.00						
09/28/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Finish researching misrepresentation torts and fraud	\$888.00	2.40		\$2,131.20								
09/28/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	edit memo re same	\$888.00	0.50		\$444.00								
09/28/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	email same to GBW and C. Healey	\$888.00	0.20		\$177.60								
09/28/2022	Guy Wallace (GBW)	com's with BU; MTJ re testimony of Dr. Flores; Watermark task times; Aegis task times	\$1,188.00	0.50		\$594.00								
09/28/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with C. Healey re research	\$888.00	0.20		\$177.60								
09/28/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Draft email to C. Healey	\$888.00	0.80		\$710.40								
09/28/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	com's with GBW re research re intent not to perform	\$888.00	0.20		\$177.60								
09/28/2022	Mark Johnson (MTJ)	call w/ RLS re aggregate analysis of happy camper declarations	\$888.00	0.20		\$177.60								
09/28/2022	Mark Johnson (MTJ)	work on summary of record evidence cited by Ds in AOB on 23f appeal	\$888.00	4.00		\$3,552.00								
09/29/2022	Rachel Steyer (RLS)	discussion with MTJ about happy camper declarant analysis project, fields to track	775	0.30		\$232.50	0.3	\$232.50						
09/29/2022	Rachel Steyer (RLS)	email to MTJ summarizing fields for spreadsheet	775	0.10		\$77.50	0.1	\$77.50						
09/29/2022	Rachel Steyer (RLS)	question to MTJ about field in declarant tracking spreadsheet	775	0.10		\$77.50	0.1	\$77.50						
09/29/2022	Rachel Steyer (RLS)	reviewing specific declarations sent by MTJ	775	0.20		\$155.00	0.2	\$155.00						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
09/29/2022	Rachel Steyer (RLS)	reviewing happy camper declarants, updating spreadsheet	775		6.40		\$4,960.00	6.4	\$4,960.00		
09/29/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Draft email to C. Healey with additional research results		\$888.00	0.60		\$532.80				
09/29/2022	Guy Wallace (GBW)	review and analysis of Reply Declaration of Dr. Flores and scope of task time evidence considered re studies and industry task times		\$1,188.00	0.50		\$594.00				
09/29/2022	Guy Wallace (GBW)	com's with BU re same		\$1,188.00	0.20		\$237.60				
09/29/2022	Guy Wallace (GBW)	com's with MTJ re review and analysis of Defendants' happy camper declarations		\$1,188.00	0.50		\$594.00				
09/29/2022	Guy Wallace (GBW)	review and analysis of Sunrise's happy camper declarations		\$1,188.00	0.60		\$712.80				
09/29/2022	Guy Wallace (GBW)	com's with MTJ; RLS re same		\$1,188.00	0.20		\$237.60				
09/29/2022	Mark Johnson (MTJ)	call w/ GBW re Sunrise happy camper decs.		\$888.00	0.20		\$177.60				
09/29/2022	Mark Johnson (MTJ)	mtg w/ RLS re analysis of happy camper decs, categories of information to be tracked from same		\$888.00	0.40		\$355.20				
09/30/2022	Rachel Steyer (RLS)	reviewing declarations and updating/working on spreadsheet	775		7.00		\$5,425.00	7	\$5,425.00		
10/02/2022	Mark Johnson (MTJ)	continue preparing analysis of D's cited record evidence		\$888.00	2.00		\$1,776.00				
10/03/2022	Rachel Steyer (RLS)	reviewing happy camper declarations and updating spreadsheet	775		7.40		\$5,735.00	7.4	\$5,735.00		
10/03/2022	Travis Close (TCC)	Email to GBW re: timeline of assignments for next few weeks		\$888.00	0.30		\$266.40				
10/03/2022	Mark Johnson (MTJ)	continue review of record and preparation of analysis of evidence cited by D in AOB		\$888.00	3.40		\$3,019.20				
10/04/2022	Rachel Steyer (RLS)	reviewing happy camper declarations, updating spreadsheet	775		0.10		\$77.50	0.1	\$77.50		
10/04/2022	Mark Johnson (MTJ)	complete draft of document identifying citations to record in AOB		\$888.00	2.00		\$1,776.00				
10/04/2022	Mark Johnson (MTJ)	review and analysis of ER for same		\$888.00	1.00		\$888.00				
10/05/2022	Rachel Steyer (RLS)	reviewing happy camper declarations, updating spreadsheet	775		7.40		\$5,735.00	7.4	\$5,735.00		
10/06/2022	Rachel Steyer (RLS)	reviewing declarations and updating spreadsheet	775		7.00		\$5,425.00	7	\$5,425.00		
10/09/2022	Mark Johnson (MTJ)	review 80 page draft of Answering brief from CH		\$888.00	2.50		\$2,220.00				
10/10/2022	Rachel Steyer (RLS)	response to MTJ and GBW about adding categories to declaration tracking spreadsheet	775		0.10		\$77.50	0.1	\$77.50		
10/10/2022	Rachel Steyer (RLS)	response to MTJ and GBW about happy camper declarations	775		0.10		\$77.50	0.1	\$77.50		
10/10/2022	Rachel Steyer (RLS)	response to MTJ and GBW about happy camper declarations	775		0.10		\$77.50	0.1	\$77.50		
10/10/2022	Rachel Steyer (RLS)	reviewing happy camper declarations and updating spreadsheet	775		6.30		\$4,882.50	6.3	\$4,882.50		
10/10/2022	Mark Johnson (MTJ)	complete review of CH draft fo answering brief		\$888.00	1.50		\$1,332.00				
10/10/2022	Mark Johnson (MTJ)	email coms w/ RLS re status of happy camper declaration review, identification of particular ssiues re payment of fees, disclosures.		\$888.00	0.20		\$177.60				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs		Hrs		Hrs		Hrs	
10/10/2022	Guy Wallace (GBW)	review and analysis of draft answering brief from CJH	\$1,188.00		1.20	\$1,425.60								
10/10/2022	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00		0.20	\$237.60								
10/11/2022	Rachel Steyer (RLS)	joined meeting with cocounsel and GBW, MTJ, JU to discuss Sunrise appeal	775		1.40	\$1,085.00	1.4	\$1,085.00						
10/11/2022	Rachel Steyer (RLS)	continuing review of happy camper declarations, updating spreadsheet	775		5.80	\$4,495.00	5.8	\$4,495.00						
10/11/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Conference call with co-counsel re Answering Brief	\$888.00		1.40	\$1,243.20								
10/11/2022	Mark Johnson (MTJ)	team mtg w/ CH, GBW, MY, BU, JU, RS re draft answering brief, strategy, declarations, other aspects of the record and analysis	\$888.00		1.70	\$1,509.60			1.7	1,509.60				
10/11/2022	Travis Close (TCC)	Email to LEC re: caselaw excerpts needed printing	\$888.00		0.30	\$266.40								
10/11/2022	Guy Wallace (GBW)	review and analysis of draft brief from CJH	\$1,188.00		2.70	\$3,207.60								
10/11/2022	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00		0.20	\$237.60								
10/11/2022	Guy Wallace (GBW)	zoom with CJH; MAY; BU; MTJ; JAU; RLS re draft answering brief	\$1,188.00		1.60	\$1,900.80								
10/11/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review research assignment and plan and prepare for addressing it	\$888.00		0.20	\$177.60								
10/12/2022	Rachel Steyer (RLS)	email to GBW and MTJ providing declaration spreadsheet analysis	775		0.20	\$155.00	0.2	\$155.00						
10/12/2022	Rachel Steyer (RLS)	response to GBW and MTJ about language in declarations	775		0.10	\$77.50	0.1	\$77.50						
10/12/2022	Rachel Steyer (RLS)	completing review of happy camper declarations and spreadsheet	775		2.40	\$1,860.00	2.4	\$1,860.00						
10/12/2022	Rachel Steyer (RLS)	response to GBW and MTJ about declaration review	775		0.10	\$77.50	0.1	\$77.50						
10/12/2022	Rachel Steyer (RLS)	reviewing latest draft of appellate brief response	775		2.70	\$2,092.50	2.7	\$2,092.50						
10/12/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with C. Healey re research project.	\$888.00		0.10	\$88.80								
10/12/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research whether inference of reliance may only be rebutted by evidence that can be properly generalized to the class as a whole	\$888.00		3.30	\$2,930.40								
10/12/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Phone call with C. Healey re research	\$888.00		0.20	\$177.60								
10/12/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Shepardize Maya v Centex	\$888.00		1.00	\$888.00								
10/12/2022	Guy Wallace (GBW)	com's with RLS re draft spreadsheet re declaration testimony of Defendants' happy camper witnesses	\$1,188.00		0.40	\$475.20								
10/12/2022	Guy Wallace (GBW)	com's with CJH re preparation of answering brief and sections re expert testimony	\$1,188.00		0.40	\$475.20								
10/13/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Shepardize Maya	\$888.00		1.80	\$1,598.40								
10/13/2022	Guy Wallace (GBW)	legal research and analysis re Defendants' Daubert challenge to Plaintiffs' experts	\$1,188.00		1.80	\$2,138.40								
10/14/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Email to C. Healey re cite checking Maya v. Centex	\$888.00		0.30	\$266.40								
10/14/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Cite check Maya v. Centex	\$888.00		2.80	\$2,486.40								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions							
				Worked	Fees	General		CC Confs		Falkenberg		Travel	
<u>Fees</u>						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
10/14/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with C. Healey re research	\$888.00	0.10	\$88.80								
10/14/2022	Guy Wallace (GBW)	review and analysis of Defendants' arguments in their AOB re Plaintiffs' experts	\$1,188.00	2.40	\$2,851.20								
10/14/2022	Guy Wallace (GBW)	legal research and analysis re same	\$1,188.00	2.00	\$2,376.00								
10/14/2022	Guy Wallace (GBW)	review and analysis of Defendants' arguments re Dr. Flores and cases cited therein	\$1,188.00	1.30	\$1,544.40								
10/15/2022	Guy Wallace (GBW)	review and analysis of Defendants' arguments re Plaintiffs' expert evidence	\$1,188.00	2.30	\$2,732.40								
10/15/2022	Guy Wallace (GBW)	preparation of reply points	\$1,188.00	1.00	\$1,188.00								
10/16/2022	Guy Wallace (GBW)	preparation of outline of AAB section re expert testimony	\$1,188.00	2.40	\$2,851.20								
10/16/2022	Guy Wallace (GBW)	review and analysis of district court briefing re motions to strike	\$1,188.00	1.00	\$1,188.00								
10/16/2022	Guy Wallace (GBW)	preparation of detailed outline of points re AAB and testimony of Dr. Flores, Dr. Kennedy and Mr. Schroyer	\$1,188.00	4.80	\$5,702.40								
10/17/2022	Guy Wallace (GBW)	review and analysis of Defendants' Answering Brief and district court briefing re Kennedy; Schroyer	\$1,188.00	1.80	\$2,138.40								
10/17/2022	Guy Wallace (GBW)	preparation of detailed outline of arguments re Plaintiffs' experts for AAB	\$1,188.00	3.70	\$4,395.60								
10/17/2022	Guy Wallace (GBW)	zoom with DTM; JT; CJH re the risk to members of the Plaintiff class of being denied services	\$1,188.00	0.50	\$594.00								
10/18/2022	Guy Wallace (GBW)	analysis of Defendants' arguments re "damages for everyone" and reply points re same	\$1,188.00	1.70	\$2,019.60								
10/18/2022	Mark Johnson (MTJ)	call w/ GBW re responde to Ds attack on damages modell and Kennedy declaration, damage theory for move-in and service fees.	\$888.00	0.20	\$177.60								
10/18/2022	Guy Wallace (GBW)	preparation of detailed outline of response for AAB section re Defendants' arguments re Plaintiffs' experts	\$1,188.00	2.30	\$2,732.40								
10/19/2022	Guy Wallace (GBW)	preparation of detailed outline of section of AAB re Plaintiffs' expert testimony	\$1,188.00	2.40	\$2,851.20								
10/19/2022	Guy Wallace (GBW)	com's with BU; JAU re same	\$1,188.00	0.20	\$237.60								
10/19/2022	Guy Wallace (GBW)	com's with CJH; DTM; JT; BU; MTJ; JAU re testimony of Dr. Flores re task times and study conducted by Dr. Flores; testimony of Crandall	\$1,188.00	1.40	\$1,663.20								
10/19/2022	Guy Wallace (GBW)	preparation of argument re legal standard re analysis of expert testimony at the class certification stage; legal research and analysis re Ninth Circuit precedents re same	\$1,188.00	2.60	\$3,088.80								
10/19/2022	Mark Johnson (MTJ)	calls (x4) w/ GBW re D argument on 23f appeal concerning Flores task time studes v. task time identified for Sunrise	\$888.00	0.80	\$710.40								
10/19/2022	Guy Wallace (GBW)	preparation and drafting of section re Dr. Flores for AAB	\$1,188.00	1.30	\$1,544.40								
10/19/2022	Mark Johnson (MTJ)	review of Flores depo testimony, declaration, briefing on issue of task time studies v opininon re required task times, email exchanges w/ JAU, GBW, BU re same.	\$888.00	3.50	\$3,108.00								
10/20/2022	Guy Wallace (GBW)	preparation and drafting of argument regarding Dr. Flores' testimony	\$1,188.00	4.70	\$5,583.60								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees		Lodestar Reductions					
				Worked		General		CC Confs		Falkenberg		Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
10/20/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re Flores	\$888.00	0.10			\$88.80						
10/20/2022	Guy Wallace (GBW)	legal research and analysis re Ninth Circuit decision in Elosu and standard for reliability under Daubert	\$1,188.00	0.50			\$594.00						
10/20/2022	Guy Wallace (GBW)	preparation and drafting of argument re Dr. Kennedy and admissibility and reliability	\$1,188.00	0.50			\$594.00						
10/20/2022	Guy Wallace (GBW)	com's with MTJ; JAU re Flores depo testimony and task time studies	\$1,188.00	0.50			\$594.00						
10/20/2022	Guy Wallace (GBW)	preparation and drafting of argument re Dr. Kennedy and expert testimony for AAB	\$1,188.00	1.80			\$2,138.40						
10/21/2022	Guy Wallace (GBW)	preparation of section of AAB re Plaintiffs' expert testimony and commonality	\$1,188.00	3.50			\$4,158.00						
10/21/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review emails between GBW, MTJ and B. Umpierre re Flores and task times	\$888.00	0.10			\$88.80						
10/21/2022	Guy Wallace (GBW)	preparation and drafting of argument for AAB re expert testimony of Schroyer	\$1,188.00	3.40			\$4,039.20						
10/21/2022	Guy Wallace (GBW)	review and analysis of com's from CJH; DTM; BU re Flores testimony and analyses re task times	\$1,188.00	0.50			\$594.00						
10/21/2022	Guy Wallace (GBW)	preparation and drafting of section re Plaintiffs' experts	\$1,188.00	2.20			\$2,613.60						
10/22/2022	Guy Wallace (GBW)	preparation of section of AAB re expert testimony	\$1,188.00	1.10			\$1,306.80						
10/22/2022	Guy Wallace (GBW)	review and analysis of draft and preparation of further points	\$1,188.00	1.00			\$1,188.00						
10/22/2022	Guy Wallace (GBW)	revise and edit draft section of AAB re Plaintiffs' expert testimony	\$1,188.00	3.30			\$3,920.40						
10/24/2022	Mark Johnson (MTJ)	review and edit and provide comment on insert for AAB re expert evidence	\$888.00	1.30			\$1,154.40						
10/24/2022	Guy Wallace (GBW)	review and analysis of MTJ edits re draft of section re experts	\$1,188.00	0.40			\$475.20						
10/24/2022	Guy Wallace (GBW)	com's with CJH and MTJ re same	\$1,188.00	0.20			\$237.60						
10/31/2022	Mark Johnson (MTJ)	com w/ GBW re deadline for amicus briefs and status of amici	\$888.00	0.10			\$88.80						
10/31/2022	Mark Johnson (MTJ)	calls w/ JY, BU, GCG re potential amici on 23f appeal	\$888.00	0.50			\$444.00						
11/03/2022	Travis Close (TCC)	Email to GBW re: Sunrise tasks for this week	\$888.00	0.20			\$177.60						
11/08/2022	Guy Wallace (GBW)	review and analysis of Eleventh Circuit decisions re application of TransUnion re standing	\$1,188.00	0.90			\$1,069.20						
11/08/2022	Guy Wallace (GBW)	com's with CANHR and AARP re potential amicus re Defendants' Rule 23(f) appeal	\$1,188.00	0.30			\$356.40						
11/09/2022	Guy Wallace (GBW)	review and analysis of draft answering brief re Rule 23(f) appeal	\$1,188.00	1.30			\$1,544.40						
11/09/2022	Mark Johnson (MTJ)	Zoom call w/ COC CJH, GBW, BU, MY re most recent draft of answering brief, extension of time to file brief, subjects to be addressed by Amici, tasks for completion of brief.	\$888.00	1.00			\$888.00						
11/09/2022	Mark Johnson (MTJ)	begin review and edit of latest draft of AAB	\$888.00	1.60			\$1,420.80						
11/09/2022	Travis Close (TCC)	Legal research re: whether reliance under CLRA can be assumed by signature on contract	\$888.00	1.20			\$1,065.60						
11/09/2022	Travis Close (TCC)	Email to MTJ re: research needed for question on appeal	\$888.00	0.20			\$177.60						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
11/09/2022	Guy Wallace (GBW)	review and analysis of draft AAB; preparation for call with co-counsel	\$1,188.00	0.90		\$1,069.20									
11/09/2022	Guy Wallace (GBW)	zoom with CJH; BU; MAY; MTJ re draft AAB and next steps re preparation of answering brief; amici	\$1,188.00	0.90		\$1,069.20									
11/10/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re research	\$888.00	0.10		\$88.80									
11/10/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	emails with C. Healey re same	\$888.00	0.10		\$88.80									
11/11/2022	Guy Wallace (GBW)	prepare for and participate in zoom with AARP; CANHR; Yelin; CJH; BU re amicus briefs for Rule 23(f) appeal	\$1,188.00	1.20		\$1,425.60									
11/11/2022	Guy Wallace (GBW)	com's with CJH; BU re amici	\$1,188.00	0.70		\$831.60									
11/14/2022	Guy Wallace (GBW)	com's with CJH; MO; MTJ re preparation of AAB; amici	\$1,188.00	0.60		\$712.80									
11/14/2022	Guy Wallace (GBW)	legal research and analysis of denial of certiorari in Olean and implications of same	\$1,188.00	0.40		\$475.20									
11/14/2022	Mark Johnson (MTJ)	review and edit draft answering brief, including review of portions of record	\$888.00	6.50		\$5,772.00									
11/14/2022	Mark Johnson (MTJ)	call w/ GBW re draft answering brief, edits to same, expert issues	\$888.00	0.30		\$266.40									
11/14/2022	Guy Wallace (GBW)	review and analysis of proposed revisions to draft AAB from MO; MTJ	\$1,188.00	0.80		\$950.40									
11/15/2022	Guy Wallace (GBW)	review and analysis of draft AAB	\$1,188.00	1.30		\$1,544.40									
11/15/2022	Guy Wallace (GBW)	com's with CJH; MO; BU re draft AAB	\$1,188.00	0.70		\$831.60									
11/17/2022	Guy Wallace (GBW)	legal research and analysis re Bowerman decision and potential impact on Rule 23(f) appeal	\$1,188.00	0.40		\$475.20									
11/17/2022	Travis Close (TCC)	Review and analyze draft of Ps' Answering brief	\$888.00	0.90		\$799.20									
11/20/2022	Guy Wallace (GBW)	legal research and analysis re TransUnion and recent class certification decisions in the Ninth Circuit re application at the class certification stage	\$1,188.00	0.60		\$712.80									
11/21/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research what evidence a defendant must provide to rebut inference of classwide reliance	\$888.00	1.70		\$1,509.60									
11/21/2022	Travis Close (TCC)	Analyze Sunrise's billing records for info on amount of move-in fees paid by each class member	\$888.00	0.60		\$532.80									
11/22/2022	Guy Wallace (GBW)	preparation of request for extension of time re AAB	\$1,188.00	0.30		\$356.40									
11/22/2022	Guy Wallace (GBW)	com's with CJH; MO; BU; MTJ re same	\$1,188.00	0.20		\$237.60									
11/22/2022	Mark Johnson (MTJ)	prepare draft application for extension of time	\$888.00	0.30		\$266.40									
11/22/2022	Mark Johnson (MTJ)	coms w/ GBW re same	\$888.00	0.20		\$177.60									
11/23/2022	Guy Wallace (GBW)	request for extension of time re briefing schedule	\$1,188.00	0.70		\$831.60									
11/23/2022	Guy Wallace (GBW)	com's with opposing counsel re same; CJH; MO; BU; MTJ	\$1,188.00	0.20		\$237.60									
11/25/2022	Guy Wallace (GBW)	legal research and analysis re standard of review re orders granting class certification	\$1,188.00	0.70		\$831.60									
11/25/2022	Guy Wallace (GBW)	review and analysis of draft AAB	\$1,188.00	0.70		\$831.60									
11/25/2022	Guy Wallace (GBW)	legal research and analysis re benefit of the bargain; classwide harm or injury	\$1,188.00	0.70		\$831.60									
11/26/2022	Guy Wallace (GBW)	legal research and analysis re benefit of the bargain defense; Kwikset and Hinojos and district court opinions applying same	\$1,188.00	1.10		\$1,306.80									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
11/28/2022	Lourdes Castro (LEC)	Locating document for JAU	450		1.60		\$720.00				
11/28/2022	Lourdes Castro (LEC)	Finalizing and filing form 14 re extension of time	450		1.00		\$450.00	1.6	\$720.00		
11/28/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review MCC, Defendant's Rule 23(f) Petition, and Plaintiffs' Answer to Rule 23(f) petition		\$888.00	3.00		\$2,664.00				
11/28/2022	Guy Wallace (GBW)	review and analysis of current draft of AAB		\$1,188.00	0.90		\$1,069.20				
11/28/2022	Guy Wallace (GBW)	com's with JAU re same		\$1,188.00	0.20		\$237.60				
11/29/2022	Guy Wallace (GBW)	revise and edit further draft of AAB		\$1,188.00	0.80		\$950.40				
11/29/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review district court opinion and AOB		\$888.00	2.30		\$2,042.40				
11/29/2022	Guy Wallace (GBW)	review and analysis of Ninth Circuit order re schedule on briefing		\$1,188.00	0.10		\$118.80				
11/29/2022	Guy Wallace (GBW)	com's with amicus re same		\$1,188.00	0.10		\$118.80				
11/29/2022	Mark Johnson (MTJ)	call w/ GBW re draft AOB and benefit of bargain defense		\$888.00	0.20		\$177.60				
11/30/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review AOB, Amicus Briefs		\$888.00	2.60		\$2,308.80				
11/30/2022	Guy Wallace (GBW)	review and analysis of Defendants' arguments in AOB and responses thereto in draft AAB		\$1,188.00	2.20		\$2,613.60				
12/01/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Amicus Brief		\$888.00	0.80		\$710.40				
12/01/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Flores' deposition transcript and take notes on same		\$888.00	3.40		\$3,019.20				
12/01/2022	Guy Wallace (GBW)	com's with PK; LP; CJH; BU re damages model		\$1,188.00	0.30		\$356.40				
12/01/2022	Guy Wallace (GBW)	com's with CJH re draft AAB		\$1,188.00	0.40		\$475.20				
12/01/2022	Guy Wallace (GBW)	revise and edit draft AAB		\$1,188.00	0.80		\$950.40				
12/02/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Flores' deposition transcript;		\$888.00	2.60		\$2,308.80				
12/02/2022	Guy Wallace (GBW)	com's with CJH; MTJ re potential approaches to settlement and response to com from Lee re same		\$1,188.00	0.90		\$1,069.20				
12/02/2022	Guy Wallace (GBW)	com's with BU; JAU re deposition testimony of Dr. Flores		\$1,188.00	0.50		\$594.00				
12/02/2022	Guy Wallace (GBW)	revise and edit further draft of AAB		\$1,188.00	1.20		\$1,425.60				
12/02/2022	Guy Wallace (GBW)	com's with CJH re same		\$1,188.00	0.20		\$237.60				
12/02/2022	Mark Johnson (MTJ)	call w/ GBW re settlement prospects and timing, merits of case, communications w/ OC re settlement		\$888.00	0.50		\$444.00				
12/03/2022	Guy Wallace (GBW)	revise and edit further draft of AAB		\$1,188.00	3.70		\$4,395.60				
12/04/2022	Guy Wallace (GBW)	legal research and analysis re Mazza and its discussion of injury-in-fact & its progeny		\$1,188.00	0.90		\$1,069.20				
12/05/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Flores' deposition transcript and take notes on same		\$888.00	0.80		\$710.40				
12/05/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Locate and review Flores' declaration and exhibits		\$888.00	1.70		\$1,509.60				
12/05/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	take notes on same		\$888.00	0.50		\$444.00				
12/05/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Email com's with GBW re Flores		\$888.00	0.10		\$88.80				
12/05/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Locate literature relied on by Flores		\$888.00	0.40		\$355.20				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs		Hrs		Hrs		Hrs	
12/05/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	email LEC re same	\$888.00	0.10		\$88.80								
12/05/2022	Guy Wallace (GBW)	revise and edit further draft of AAB	\$1,188.00	1.60		\$1,900.80								
12/06/2022	Lourdes Castro (LEC)	Locating documents re expert's report of Cristina Flores	450	1.20		\$540.00	1.2	\$540.00						
12/06/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Flores' reply declaration	\$888.00	0.70		\$621.60								
12/06/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Locate literature in Flores' Ex. 26	\$888.00	0.50		\$444.00								
12/06/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review literature relied on by Flores	\$888.00	2.00		\$1,776.00								
12/06/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	take notes on same	\$888.00	0.20		\$177.60								
12/06/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Draft chart of ADL times based on Flores data and literature	\$888.00	0.40		\$355.20								
12/06/2022	Guy Wallace (GBW)	legal research and analysis re cases cited in draft AAB	\$1,188.00	1.60		\$1,900.80								
12/07/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review literature relied on by C. Flores	\$888.00	0.40		\$355.20								
12/07/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	take notes re same	\$888.00	0.20		\$177.60								
12/07/2022	Guy Wallace (GBW)	com's with CJH; MTJ; JAU re further revisions to draft AAB	\$1,188.00	0.40		\$475.20								
12/07/2022	Guy Wallace (GBW)	legal research and analysis re material omissions and inference of classwide reliance	\$1,188.00	0.90		\$1,069.20								
12/07/2022	Guy Wallace (GBW)	revise and edit draft AAB	\$1,188.00	1.40		\$1,663.20								
12/08/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review literature relied on by C. Flores and take notes on same	\$888.00	3.50		\$3,108.00								
12/08/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Email com's to GBW re planning	\$888.00	0.10		\$88.80								
12/09/2022	Guy Wallace (GBW)	revise and edit draft AAB	\$1,188.00	1.50		\$1,782.00								
12/09/2022	Guy Wallace (GBW)	legal research and analysis re potential uses of Olean en banc decision to support class certification order	\$1,188.00	1.00		\$1,188.00								
12/09/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review literature relied on by C. Flores and take notes on same	\$888.00	3.30		\$2,930.40								
12/09/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re Flores	\$888.00	0.50		\$444.00								
12/09/2022	Guy Wallace (GBW)	com's with JAU re testimony of Dr. Flores and record support re task times	\$1,188.00	0.50		\$594.00								
12/09/2022	Guy Wallace (GBW)	review and analysis of draft AAB	\$1,188.00	0.60		\$712.80								
12/09/2022	Guy Wallace (GBW)	review and analysis of district court discussion of commonality and predominance	\$1,188.00	0.50		\$594.00								
12/10/2022	Guy Wallace (GBW)	revise and edit draft AAB, including sections re benefit of the bargain and Defendants' declarations	\$1,188.00	2.60		\$3,088.80								
12/10/2022	Guy Wallace (GBW)	revise and edit draft AAB	\$1,188.00	0.90		\$1,069.20								
12/10/2022	Guy Wallace (GBW)	legal research and analysis re reliance and Ninth Circuit and CA authorities re same	\$1,188.00	0.80		\$950.40								
12/11/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review literature relied on by C. Flores	\$888.00	2.30		\$2,042.40								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions									
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees		
							Hrs		Hrs		Hrs		Hrs		Hrs	
12/11/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	take notes on same	\$888.00	0.20		\$177.60										
12/11/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Look for task times in Aegis case	\$888.00	0.10		\$88.80										
12/11/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	email GBW re same	\$888.00	0.10		\$88.80										
12/12/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Watermark and Aegis task times	\$888.00	0.60		\$532.80										
12/12/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Email to GBW summarizing literature	\$888.00	0.30		\$266.40										
12/12/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review draft of ARB on Flores	\$888.00	0.10		\$88.80										
12/12/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	email GBW re same	\$888.00	0.10		\$88.80										
12/12/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review com's with GBW, MTJ and B. Umpierre re Crandall issue	\$888.00	0.50		\$444.00										
12/12/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re Flores	\$888.00	0.10		\$88.80										
12/12/2022	Mark Johnson (MTJ)	review revised draft of 23(f) responsive brief section re experts from GBW	\$888.00	1.00		\$888.00										
12/13/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review remainder of literature relied on by C. Flores in reply declaration	\$888.00	0.40		\$355.20										
12/13/2022	Guy Wallace (GBW)	revise and edit draft AAB	\$1,188.00	2.70		\$3,207.60										
12/13/2022	Guy Wallace (GBW)	review and analysis of com's from CJH; JAU re same	\$1,188.00	0.20		\$237.60										
12/14/2022	Guy Wallace (GBW)	revise and edit draft AAB; sections re class certification and damages model	\$1,188.00	2.70		\$3,207.60										
12/14/2022	Guy Wallace (GBW)	revise and edit draft AAB; sections re experts and damages	\$1,188.00	0.80		\$950.40										
12/14/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review ARB	\$888.00	1.40		\$1,243.20										
12/14/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re ARB	\$888.00	0.10		\$88.80										
12/14/2022	Guy Wallace (GBW)	revise and edit draft AAB; discussion of Daubert and Ellis requirements	\$1,188.00	0.80		\$950.40										
12/14/2022	Guy Wallace (GBW)	preparation of redline of edits to draft AAB	\$1,188.00	3.60		\$4,276.80										
12/15/2022	Rachel Steyer (RLS)	providing happy camper declarant chart to JUB	775	0.10		\$77.50	0.1	\$77.50								
12/15/2022	Rachel Steyer (RLS)	response to JUB summarizing findings of happy camper declarants	775	0.20		\$155.00	0.2	\$155.00								
12/15/2022	Guy Wallace (GBW)	preparation of redline of revised draft AAB	\$1,188.00	2.10		\$2,494.80										
12/15/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re assignments re ARB	\$888.00	0.20		\$177.60										
12/15/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with RLS re declarations	\$888.00	0.10		\$88.80										
12/15/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review chart re happy camper declarations	\$888.00	2.20		\$1,953.60										
12/15/2022	Guy Wallace (GBW)	prepare for tc with JAU re revisions to draft AAB	\$1,188.00	0.80		\$950.40										

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
12/15/2022	Guy Wallace (GBW)	revise and edit argument sections of draft AAB	\$1,188.00	1.10							
12/15/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review research assignment and print cases etc.	\$888.00	0.30							
12/15/2022	Guy Wallace (GBW)	revise and edit draft AAB; statement of facts and argument sections	\$1,188.00	2.30							
12/16/2022	Guy Wallace (GBW)	revise and edit draft AAB	\$1,188.00	1.70							
12/16/2022	Guy Wallace (GBW)	preparation of redline re same	\$1,188.00	1.00							
12/16/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research re no distinction between goods and services for purposes of seller's duty to disclose	\$888.00	4.60							
12/16/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	email GBW re same	\$888.00	0.20							
12/16/2022	Mark Johnson (MTJ)	review GBW revised draft of answering brief in opposition to 23(f) appeal	\$888.00	1.40							
12/16/2022	Mark Johnson (MTJ)	draft email with big picture comments re same.	\$888.00	0.20							
12/17/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research cases where class members not aware they suffered an injury	\$888.00	2.50							
12/18/2022	Guy Wallace (GBW)	legal research and analysis re "benefit of the bargain" defense	\$1,188.00	1.60							
12/19/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research class members often not even aware they suffered from an injury	\$888.00	2.60							
12/19/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Email to GBW re research re class members unaware of injury	\$888.00	0.20							
12/19/2022	Mark Johnson (MTJ)	com w/ Amicus authors, participants	\$888.00	1.10							
12/20/2022	Rachel Steyer (RLS)	response to JUB concerning weight of happy camper declarations	775	0.10				0.1	\$77.50		
12/20/2022	Rachel Steyer (RLS)	response to JUB about length of facility closures	775	0.10				0.1	\$77.50		
12/20/2022	Rachel Steyer (RLS)	response to JUB about happy camper declarants	775	0.10				0.1	\$77.50		
12/20/2022	Rachel Steyer (RLS)	response to GBW and JUB concerning happy camper section in brief	775	0.10				0.1	\$77.50		
12/20/2022	Rachel Steyer (RLS)	reviewing draft section of brief concerning happy camper declarants	775	0.10				0.1	\$77.50		
12/20/2022	Rachel Steyer (RLS)	response to GBW and JUB concerning happy camper declaration	775	0.10				0.1	\$77.50		
12/20/2022	Rachel Steyer (RLS)	reviewing declarations	775	0.40				0.4	\$310.00		
12/20/2022	Rachel Steyer (RLS)	reviewing declaration sent by JUB	775	0.20				0.2	\$155.00		
12/20/2022	Rachel Steyer (RLS)	response to JUB and GBW about happy camper declarants	775	0.20				0.2	\$155.00		
12/20/2022	Rachel Steyer (RLS)	response to JUB and GBW concerning language in hpapy camper declaration	775	0.10				0.1	\$77.50		
12/20/2022	Rachel Steyer (RLS)	response to GBW and JUB with suggestions for declarant section	775	0.30				0.3	\$232.50		
12/20/2022	Rachel Steyer (RLS)	response to JUB and GBW about happy camper declarants	775	0.10				0.1	\$77.50		
12/20/2022	Rachel Steyer (RLS)	forwarding earlier email from MTJ to JUB with analysis of happy camper declarations	775	0.10				0.1	\$77.50		

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/20/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review "happy camper" declarations for revision of brief re same	\$888.00	3.00		\$2,664.00								
12/20/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re happy camper declarants as class members	\$888.00	0.10		\$88.80								
12/20/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Search for current class list	\$888.00	0.50		\$444.00								
12/20/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Email to GBW and RLS re happy camper declarations	\$888.00	0.10		\$88.80								
12/20/2022	Guy Wallace (GBW)	review and analysis of current draft of AAB and redlined versions of same	\$1,188.00	1.50		\$1,782.00								
12/20/2022	Guy Wallace (GBW)	com's with CJH; JAU re further revisions and points	\$1,188.00	0.20		\$237.60								
12/20/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Compare class list against declarations already reviewed	\$888.00	0.30		\$266.40								
12/20/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	take notes on same	\$888.00	0.20		\$177.60								
12/21/2022	Rachel Steyer (RLS)	reviewing declaration filed by opposing counsel describing class members	775	0.10		\$77.50	0.1	\$77.50						
12/21/2022	Rachel Steyer (RLS)	tabulating current/former residents from chart	775	0.20		\$155.00	0.2	\$155.00						
12/21/2022	Rachel Steyer (RLS)	response to JUB, GBW and co-counsel concerning declarants	775	0.10		\$77.50	0.1	\$77.50						
12/21/2022	Rachel Steyer (RLS)	response to GBW and JUB about list of class member declarants	775	0.10		\$77.50	0.1	\$77.50						
12/21/2022	Rachel Steyer (RLS)	question to JUB and GBW about class member declaration document	775	0.10		\$77.50	0.1	\$77.50						
12/21/2022	Rachel Steyer (RLS)	response to GBW about current/former declarants in chart	775	0.10		\$77.50	0.1	\$77.50						
12/21/2022	Rachel Steyer (RLS)	response to GBW about number of current declarants	775	0.10		\$77.50	0.1	\$77.50						
12/21/2022	Rachel Steyer (RLS)	response to GBW about chart and status of arbitration opt-in/out declarants	775	0.10		\$77.50	0.1	\$77.50						
12/21/2022	Rachel Steyer (RLS)	re-reviewing attorney declaration to clarify info about arbitration status of class memembr declarations with chart	775	0.10		\$77.50	0.1	\$77.50						
12/21/2022	Rachel Steyer (RLS)	updating chart tracking declarants	775	1.80		\$1,395.00	1.8	\$1,395.00						
12/21/2022	Rachel Steyer (RLS)	reviewing email analysis from GBW about declaration	775	0.10		\$77.50	0.1	\$77.50						
12/21/2022	Rachel Steyer (RLS)	reviewing plaintiffs' evidentiary objections to declarations as provided by cocounsel	775	0.20		\$155.00	0.2	\$155.00						
12/21/2022	Rachel Steyer (RLS)	reviewing internal emails/communications from GBW with analysis about various declarations	775	0.10		\$77.50	0.1	\$77.50						
12/21/2022	Rachel Steyer (RLS)	preparing and sending email to GBW, JUB, MTJ, and co-counsel summarizing findings of declarant arbitration status	775	0.50		\$387.50	0.5	\$387.50						
12/21/2022	Rachel Steyer (RLS)	response to GBW about tally of declarations	775	0.10		\$77.50	0.1	\$77.50						
12/21/2022	Rachel Steyer (RLS)	response to GBW, MTJ, JUB and co-counsel concerning class list and chart	775	0.10		\$77.50	0.1	\$77.50						
12/21/2022	Rachel Steyer (RLS)	responding to GBW about total number of class member declarants	775	0.10		\$77.50	0.1	\$77.50						

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
12/21/2022	Rachel Steyer (RLS)	cross checking class list with declarant spreadsheet and resident ID numbers	775		0.40		\$310.00				
12/21/2022	Rachel Steyer (RLS)	email to GBW, MTJ, JUB and co-counsel providing revised tally of arbitration status of declarants	775		0.10		\$77.50				
12/21/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review happy camper declarations		\$888.00	1.90		\$1,687.20				
12/21/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Revise happy camper declaration section of AAB		\$888.00	1.00		\$888.00				
12/21/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re AAB		\$888.00	0.90		\$799.20				
12/21/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with MTJ re class list		\$888.00	0.20		\$177.60				
12/21/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Compile class member declarations and send to GBW		\$888.00	0.30		\$266.40				
12/21/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research belief under the federal rules of evidence		\$888.00	0.20		\$177.60				
12/21/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re happy camper declarations		\$888.00	0.10		\$88.80				
12/21/2022	Guy Wallace (GBW)	review and analysis of Defendants' happy camper declarations		\$1,188.00	4.00		\$4,752.00				
12/21/2022	Guy Wallace (GBW)	com's with MTJ; JAU; RLS re analysis of same and counterarguments		\$1,188.00	0.20		\$237.60				
12/21/2022	Guy Wallace (GBW)	com's with BU; RLS re number of happy camper residents that pertain to current class members		\$1,188.00	0.40		\$475.20				
12/21/2022	Mark Johnson (MTJ)	follow-up call with GBW re happy camper declarations, separate analysis of decs re class members re non-class members		\$888.00	0.20		\$177.60				
12/22/2022	Rachel Steyer (RLS)	response to GBW, MTJ, JUB concerning additional fields/areas of analysis of declarations	775		0.10		\$77.50	0.1			\$77.50
12/22/2022	Rachel Steyer (RLS)	reviewing emails from MTJ, GBW, JUB concerning additional areas of analysis of declarations	775		0.10		\$77.50	0.1			\$77.50
12/22/2022	Rachel Steyer (RLS)	reviewing document prepared by JUB summarizing stock statements in declarations	775		0.10		\$77.50	0.1			\$77.50
12/22/2022	Rachel Steyer (RLS)	reviewing emails from JUB explaining discrepancy in declaration numbers/lists from defendants' exhibits	775		0.10		\$77.50	0.1			\$77.50
12/22/2022	Rachel Steyer (RLS)	response to JUB concerning go ahead of starting updated analysis of declarations	775		0.10		\$77.50	0.1			\$77.50
12/22/2022	Rachel Steyer (RLS)	reviewing GBW additions/revisions to areas of further analysis to declarations	775		0.10		\$77.50	0.1			\$77.50
12/22/2022	Rachel Steyer (RLS)	call with JUB to review and discuss new chart	775		0.30		\$232.50	0.3			\$232.50
12/22/2022	Rachel Steyer (RLS)	further analysis of declarations and creation of new chart	775		3.80		\$2,945.00	3.8			\$2,945.00
12/22/2022	Rachel Steyer (RLS)	question to JUB about fields in new chart	775		0.10		\$77.50	0.1			\$77.50
12/22/2022	Rachel Steyer (RLS)	email to JUB concerning status of revised chart	775		0.30		\$232.50	0.3			\$232.50
12/22/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review happy camper class member declarations and take notes on same		\$888.00	1.60		\$1,420.80				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General		CC Confs		Falkenberg		Travel	
							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/22/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re happy camper declarations	\$888.00	0.20		\$177.60								
12/22/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Compile list of review terms for review of happy camper declarations by RLS	\$888.00	0.60		\$532.80								
12/22/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with RLS re review of happy camper declarations	\$888.00	0.30		\$266.40								
12/22/2022	Guy Wallace (GBW)	review and analysis of Defendants' happy camper declarations	\$1,188.00	1.30		\$1,544.40								
12/22/2022	Guy Wallace (GBW)	com's with MTJ; JAU; RLS re analysis of same and counterarguments	\$1,188.00	0.20		\$237.60								
12/22/2022	Guy Wallace (GBW)	review and analysis of further draft of AAB	\$1,188.00	0.80		\$950.40								
12/22/2022	Mark Johnson (MTJ)	review and add to email exchanges w/ GBW, RLS, JAU re happy resident declaration, weaknesses and objections to same, approach to analysis of same	\$888.00	0.30		\$266.40								
12/22/2022	Guy Wallace (GBW)	legal research and analysis re CLRA requirements re reliance; individual interactions with product or service	\$1,188.00	1.50		\$1,782.00								
12/23/2022	Rachel Steyer (RLS)	sending JUB excerpted EOR	775	0.10		\$77.50	0.1	\$77.50						
12/23/2022	Rachel Steyer (RLS)	reviewing email from GBW summarizing additional issues with declarations	775	0.10		\$77.50	0.1	\$77.50						
12/23/2022	Rachel Steyer (RLS)	reviewing email from co-counsel concerning declarations and admissibility	775	0.10		\$77.50	0.1	\$77.50						
12/23/2022	Rachel Steyer (RLS)	response to JUB concerning declarant analysis spreadsheet	775	0.10		\$77.50	0.1	\$77.50						
12/23/2022	Rachel Steyer (RLS)	response to JUB about declarant spreadsheet	775	0.10		\$77.50	0.1	\$77.50						
12/23/2022	Rachel Steyer (RLS)	call with JUB to review updated declaration chart and analysis	775	0.30		\$232.50	0.3	\$232.50						
12/23/2022	Rachel Steyer (RLS)	reviewing declarations and updating chart	775	2.50		\$1,937.50	2.5	\$1,937.50						
12/23/2022	Rachel Steyer (RLS)	email to JUB with formatting question about chart	775	0.10		\$77.50	0.1	\$77.50						
12/23/2022	Lourdes Castro (LEC)	Formatting excel spreadsheet	450	0.20		\$90.00	0.2	\$90.00						
12/23/2022	Rachel Steyer (RLS)	reviewing declarations and notes provided by co-counsel	775	0.30		\$232.50	0.3	\$232.50						
12/23/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review and edit chart created by RLS re happy camper declarations	\$888.00	1.00		\$888.00								
12/23/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review relevant happy camper declarations and add to chart	\$888.00	2.00		\$1,776.00								
12/23/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Email to LEC and RLS re formatting spreadsheet	\$888.00	0.10		\$88.80								
12/23/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with RLS re happy camper chart	\$888.00	0.40		\$355.20								
12/23/2022	Guy Wallace (GBW)	legal research and analysis re recent CLRA and UCL decisions re class certification; cases with pending Rule 23(f) petitions in the Ninth Circuit	\$1,188.00	2.20		\$2,613.60								
12/23/2022	Guy Wallace (GBW)	review and analysis of further revised version of draft AAB	\$1,188.00	1.50		\$1,782.00								
12/27/2022	Rachel Steyer (RLS)	reviewing declarations and updating spreadsheet	775	6.30		\$4,882.50	6.3	\$4,882.50						
12/27/2022	Guy Wallace (GBW)	preparation of points re Sunrise's happy camper declarations	\$1,188.00	1.50		\$1,782.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/27/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review happy camper declarations	\$888.00	0.90		\$799.20								
12/27/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	take notes into chart re same	\$888.00	0.20		\$177.60								
12/27/2022	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re happy camper declarations	\$888.00	0.10		\$88.80								
12/28/2022	Rachel Steyer (RLS)	ongoing review of declarations and updating chart	775	3.50		\$2,712.50	3.5	\$2,712.50						
12/28/2022	Guy Wallace (GBW)	review and analysis of further draft of AAB	\$1,188.00	0.90		\$1,069.20								
12/28/2022	Guy Wallace (GBW)	com's with CJH; MO re same	\$1,188.00	0.20		\$237.60								
12/29/2022	Rachel Steyer (RLS)	ongoing review of declarations and updating chart	775	6.60		\$5,115.00	6.6	\$5,115.00						
12/29/2022	Guy Wallace (GBW)	review and analysis of revised version of AAB from MO	\$1,188.00	1.20		\$1,425.60								
12/29/2022	Guy Wallace (GBW)	com's with CJH; MO re same	\$1,188.00	0.20		\$237.60								
12/30/2022	Rachel Steyer (RLS)	reviewing declarants and updating chart	775	4.00		\$3,100.00	4	\$3,100.00						
12/30/2022	Rachel Steyer (RLS)	sending link to completed review of declarations/chart to JUB and GBW	775	0.10		\$77.50	0.1	\$77.50						
12/30/2022	Guy Wallace (GBW)	review and analysis of MO proposed edits to draft AAB	\$1,188.00	3.80		\$4,514.40								
12/30/2022	Guy Wallace (GBW)	com's with MO; MTJ re same	\$1,188.00			\$0.00								
01/03/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review chart re happy camper declarations	\$888.00	0.10		\$88.80								
01/03/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review com's with GBW and RLS re happy campers	\$888.00	0.40		\$355.20								
01/03/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Draft and revise section of brief on happy camper declarations	\$888.00	1.70		\$1,509.60								
01/03/2023	Guy Wallace (GBW)	com's with CJH; MO; MTJ; JAU re revisions to further draft of AAB	\$1,188.00	0.70		\$831.60								
01/04/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Draft and revise section of answering brief regarding happy camper declarations	\$888.00	2.90		\$2,575.20								
01/04/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re happy camper declarations	\$888.00	0.20		\$177.60								
01/04/2023	Guy Wallace (GBW)	review and analysis of further draft of AAB from CJH	\$1,188.00	3.40		\$4,039.20								
01/04/2023	Guy Wallace (GBW)	com's with CJH; MO; DTM; BU re current draft of AAB	\$1,188.00	0.70		\$831.60								
01/04/2023	Guy Wallace (GBW)	revisions to current draft of AAB	\$1,188.00	0.20		\$237.60								
01/04/2023	Guy Wallace (GBW)	com's with MO; JAU re further revisions to draft AAB	\$1,188.00	0.40		\$475.20								
01/04/2023	Guy Wallace (GBW)	revise and edit further draft of AAB	\$1,188.00	2.40		\$2,851.20								
01/05/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Draft and revise section of answering brief re happy camper declarations	\$888.00	2.90		\$2,575.20								
01/05/2023	Guy Wallace (GBW)	revise and edit further draft of AAB from CJH	\$1,188.00	1.80		\$2,138.40								
01/05/2023	Guy Wallace (GBW)	revise and edit draft AAB	\$1,188.00	1.10		\$1,306.80								
01/05/2023	Guy Wallace (GBW)	com's with CJH; JAU re same	\$1,188.00	0.50		\$594.00								
01/06/2023	Guy Wallace (GBW)	revise and edit draft AAB and section re Defendants' happy camper declarations	\$1,188.00	3.40		\$4,039.20								
01/06/2023	Guy Wallace (GBW)	revise and edit draft AAB	\$1,188.00	1.20		\$1,425.60								
01/06/2023	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.70		\$831.60								
01/06/2023	Guy Wallace (GBW)	preparation of redline of further draft of AAB	\$1,188.00	3.40		\$4,039.20								
01/06/2023	Mark Johnson (MTJ)	review and propose edits to revised section of AAB re declarations from resident's family members	\$888.00	0.60		\$532.80								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions						
				Worked			General	CC Confs	Falkenberg	Travel			
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
01/06/2023	Mark Johnson (MTJ)	review and edit latest draft of AAB	\$888.00	1.80									
01/06/2023	Mark Johnson (MTJ)	coms w/ GBW re revisions to AAB	\$888.00	0.80									
01/09/2023	Guy Wallace (GBW)	revise and edit further draft of AAB from CJH incorporating prior edits and further changes	\$1,188.00	3.10									
01/09/2023	Guy Wallace (GBW)	review and analysis of Olean and potential additions citations thereto	\$1,188.00	0.50									
01/09/2023	Mark Johnson (MTJ)	review latest GBW-edited version of AAB	\$888.00	1.00									
01/11/2023	Guy Wallace (GBW)	review and analysis of revised version of draft AAB from MO	\$1,188.00	0.80									
01/12/2023	Guy Wallace (GBW)	review and analysis of further version of AAB including revisions from MO and DTM	\$1,188.00	0.50									
01/13/2023	Guy Wallace (GBW)	com's with CJH; MO; MTJ re revised version of AAB and final editing tasks	\$1,188.00	0.70									
01/13/2023	Travis Close (TCC)	Review and analyze latest draft of Answer on Appeal	\$888.00	0.80									
01/13/2023	Guy Wallace (GBW)	analysis of proposal for second amicus brief from LCHB and consumer groups	\$1,188.00	0.90									
01/13/2023	Guy Wallace (GBW)	com's with CJH; MO; MTJ re same	\$1,188.00	0.20									
01/18/2023	Guy Wallace (GBW)	com's with Shaver; Chalos; Coleman; MO; CJH re potential second amicus brief responding to the Chamber of Commerce brief	\$1,188.00	0.90									
01/19/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with B. Umpierre re citations in AAB	\$888.00	0.10									
01/19/2023	Guy Wallace (GBW)	com's with CJH; MO; BU; JAU re further revisions to draft AAB	\$1,188.00	0.50									
01/20/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Cite check legal citations and make edits in AAB	\$888.00	4.70									
01/20/2023	Guy Wallace (GBW)	review and analysis of draft amicus brief and further changes to AAB	\$1,188.00	1.00									
01/20/2023	Guy Wallace (GBW)	revise and edit same	\$1,188.00	1.00									
01/20/2023	Guy Wallace (GBW)	com's with CJH; MO; JAU re same	\$1,188.00	0.20									
01/20/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Incorporate BSU edits into AAB	\$888.00	1.60									
01/22/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Incorporate BSU edits into AAB	\$888.00	1.40									
01/22/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Incorporate L. Valdez edits into AAB	\$888.00	0.60									
01/22/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Edit AAB	\$888.00	3.10									
01/23/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Edit and cite check legal citations in AAB	\$888.00	6.20									
01/23/2023	Travis Close (TCC)	Review and analyze ninth circuit's decision in Langer v. Kieser for applicability to standing of residents at Sunrise facilities	\$888.00	0.70									
01/24/2023	Lourdes Castro (LEC)	Working on TOA/TOC	\$450.00	2.90					2.9		\$1,305.00		
01/24/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Edit and cite check AAB	\$888.00	1.60									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees
							Hrs		Hrs		Hrs		Hrs	
01/24/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Email to GBW enclosing brief drafts	\$888.00	0.10		\$88.80								
01/24/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Meeting with GBW, B. Umpierre, C. Healey and M. Olivier re filing AAB	\$888.00	0.40		\$355.20								
01/24/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with TBS re hyperlinking within brief	\$888.00	0.10		\$88.80								
01/24/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re hyperlinking	\$888.00	0.10		\$88.80								
01/24/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Email to LEC re running tables	\$888.00	0.10		\$88.80								
01/24/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Look up hyperlinking in 9th Circuit rules	\$888.00	0.10		\$88.80								
01/24/2023	Guy Wallace (GBW)	com's with CJH; MO; BU; JAU re preparation of final draft of AAB; final editing tasks	\$1,188.00	0.80		\$950.40								
01/24/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Look up hyperlink issue	\$888.00	0.20		\$177.60								
01/24/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	com's with GBW re same	\$888.00	0.20		\$177.60								
01/24/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re next steps re filing	\$888.00	0.10		\$88.80								
01/24/2023	Guy Wallace (GBW)	com's with MO; JAU; TBS re hyperlinks to record and other citations in AAB	\$1,188.00	0.90		\$1,069.20								
01/25/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Incorporate changes into draft AAB from BSU and C. Healey	\$888.00	1.90		\$1,687.20								
01/25/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Proofread AAB	\$888.00	2.50		\$2,220.00								
01/25/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re status and edits	\$888.00	0.20		\$177.60								
01/25/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Email to LEC re TOC and TOA	\$888.00	0.10		\$88.80								
01/25/2023	Guy Wallace (GBW)	revise and edit final draft of AAB	\$1,188.00	3.60		\$4,276.80								
01/25/2023	Guy Wallace (GBW)	com's with CJH; JAU re same	\$1,188.00	0.80		\$950.40								
01/25/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review SER and Index	\$888.00	0.80		\$710.40								
01/26/2023	Lourdes Castro (LEC)	Working on formatting answer brief for filing	\$450.00	2.10		\$945.00	2.1							
01/26/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Save SER to server and review	\$888.00	3.10		\$2,752.80								
01/26/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Enter edits into draft AAB	\$888.00	3.90		\$3,463.20								
01/26/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Edit SER index	\$888.00	0.10		\$88.80								
01/26/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re cite checking	\$888.00	0.10		\$88.80								
01/26/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Email to TC re cite checking	\$888.00	0.20		\$177.60								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions							
				Worked			General		CC Confs		Falkenberg		Travel	
							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
01/26/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re filing	\$888.00	0.10		\$88.80								
01/26/2023	Travis Close (TCC)	Email to JUB re: cite checking assignment for answering brief	\$888.00	0.20		\$177.60								
01/26/2023	Travis Close (TCC)	Email to JUB re: cite checking new excerpt for answering brief	\$888.00	0.20		\$177.60								
01/26/2023	Travis Close (TCC)	Reviewing answering brief citations to SER & revisions to ensure accuracy (pages 1-39)	\$888.00	2.30		\$2,042.40								
01/26/2023	Guy Wallace (GBW)	review and analysis of final draft of AAB; revise and edit same	\$1,188.00	2.00		\$2,376.00								
01/26/2023	Guy Wallace (GBW)	com's with CJH; BU; JAU re same	\$1,188.00	0.20		\$237.60								
01/26/2023	Travis Close (TCC)	Reviewing answering brief citations to SER & revisions to ensure accuracy (pages 39-78)	\$888.00	1.90		\$1,687.20								
01/26/2023	Travis Close (TCC)	Reviewing answering brief citations to SER & revisions to ensure accuracy (pages 78-91)	\$888.00	0.50		\$444.00								
01/26/2023	Travis Close (TCC)	Analyze full SER and ER for info on Dr. Flores' qualifications, education, background, etc. to proof cite	\$888.00	0.70		\$621.60								
01/26/2023	Travis Close (TCC)	Checking citations to ER in draft Answering brief & revisions to ensure accuracy (pages 1-10)	\$888.00	1.00		\$888.00								
01/26/2023	Travis Close (TCC)	Email to JUB sharing revisions to answering brief	\$888.00	0.20		\$177.60								
01/26/2023	Guy Wallace (GBW)	revise and edit final draft of AAB	\$1,188.00	4.50		\$5,346.00								
01/27/2023	Lourdes Castro (LEC)	Finalizing and filing brief	\$450.00	2.70		\$1,215.00	2.7	\$1,215.00						
01/27/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review SER for highlighted pages and email BSU re same	\$888.00	0.60		\$532.80								
01/27/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re filing	\$888.00	0.40		\$355.20								
01/27/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Final edits to AAB	\$888.00	1.00		\$888.00								
01/27/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Finalize SER and Index for filing	\$888.00	0.40		\$355.20								
01/27/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review and finalize 'filing under seal' documents	\$888.00	1.00		\$888.00								
01/27/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with LEC re filing	\$888.00	0.40		\$355.20								
01/27/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Issues re filing AAB.	\$888.00	1.00		\$888.00								
01/27/2023	Travis Close (TCC)	Cite checking references to ER appeal brief -- pages 11-29	\$888.00	1.80		\$1,598.40								
01/27/2023	Travis Close (TCC)	Cite checking references to ER appeal brief -- pages 30-54	\$888.00	1.50		\$1,332.00								
01/27/2023	Travis Close (TCC)	Cite checking references to ER appeal brief -- pages 54-78	\$888.00	1.60		\$1,420.80								
01/27/2023	Travis Close (TCC)	Cite checking references to ER appeal brief -- pages 78-91	\$888.00	1.20		\$1,065.60								
01/27/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Revise signature lines for filing as GBW	\$888.00	0.50		\$444.00								
01/27/2023	Guy Wallace (GBW)	preparation of AAB and accompanying submissions	\$1,188.00	3.40		\$4,039.20								
01/27/2023	Guy Wallace (GBW)	com's with CJH; JAU re same	\$1,188.00	1.70		\$2,019.60								
01/27/2023	Travis Close (TCC)	Review and analyze final (filed) version of Answering brief on appeal	\$888.00	0.90		\$799.20								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
01/29/2023	Rachel Steyer (RLS)	reviewing/reading plaintiffs' opposition appellate brief	\$775.00	1.90							
01/30/2023	Lourdes Castro (LEC)	Comms with TBS re filing	\$450.00	0.40							
01/30/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW, LEC and TBS correct deficient filing	\$888.00	0.50							
02/01/2023	Guy Wallace (GBW)	com's with CJH; MO re potential areas of questions at oral argument	\$1,188.00	0.90							
02/01/2023	Guy Wallace (GBW)	review and analysis of draft amicus brief from LCHB	\$1,188.00	1.40							
02/01/2023	Guy Wallace (GBW)	com's with CJH and MO re same	\$1,188.00	0.20							
02/02/2023	Guy Wallace (GBW)	revise and edit draft amicus brief from LCHB	\$1,188.00	0.90							
02/02/2023	Guy Wallace (GBW)	com's with Chalos; Coleman re same	\$1,188.00	0.20							
02/02/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Check docket re filing hard copies	\$888.00	0.10							
02/02/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with GBW re filing of hard copies	\$888.00	0.10							
02/02/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with clerk re filing hard copies	\$888.00	0.10							
02/03/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Com's with clerk re whether brief is filed	\$888.00	0.10							
02/03/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review CMC statements and Answering Briefs for statements re injunctive relief and current conditions	\$888.00	0.90							
02/03/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	email to GBW re same	\$888.00	0.20							
02/03/2023	Guy Wallace (GBW)	review and analysis of amicus briefs filed by AARP et al.; LCHB for consumer organizations	\$1,188.00	1.10							
02/06/2023	Rachel Steyer (RLS)	reviewing amici brief	\$775.00	0.80			0.8		\$620.00		
02/13/2023	Lourdes Castro (LEC)	Comms with TRB Re class member intake call schedule	\$450.00	0.20			0.2		\$90.00		
02/13/2023	Lourdes Castro (LEC)	Doing intake for class member	\$450.00	1.10			1.1		\$495.00		
02/15/2023	Lourdes Castro (LEC)	Calling class member re intake	\$450.00	0.20			0.2		\$90.00		
02/15/2023	Travis Close (TCC)	Review and analyze amicus curiae brief submitted by National Consumer Law Center et al	\$888.00	0.70							
02/17/2023	Travis Close (TCC)	Review and analyze Def's motion to maintain records under seal	\$888.00	0.30							
02/17/2023	Travis Close (TCC)	Legal research re: Def's argument in sealing motion that class actions do not correlate to the merits of a case	\$888.00	1.30							
02/17/2023	Guy Wallace (GBW)	review and analysis of defendants' motion re sealing	\$1,188.00	0.20							
02/17/2023	Guy Wallace (GBW)	com's with CJH; BU re same	\$1,188.00	0.20							
02/17/2023	Guy Wallace (GBW)	review and analysis of Ninth Circuit's further decision in Bowerman re class certification and individualized liability and damages issues	\$1,188.00	0.40							
02/21/2023	Guy Wallace (GBW)	revise and edit opposition to Defendants' motion to seal the supplemental excerpts of record	\$1,188.00	0.20							
02/21/2023	Guy Wallace (GBW)	com's with BU re same	\$1,188.00	0.20							
02/22/2023	Lourdes Castro (LEC)	finalizing opposition to appellant's motion to maintain SER Vol 7-10 under seal and filing it comms with GBA and TBS re same	\$450.00	1.20			1.2		\$540.00		

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Travel	Fees		
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
02/24/2023	Guy Wallace (GBW)	com's with co-counsel re schedule on oral argument in Ninth Circuit	\$1,188.00	0.30		\$356.40					0.3		356.4		
03/08/2023	Lourdes Castro (LEC)	drafting email for MTJ re request copies to file with the court	\$450.00	0.40		\$180.00	0.4	\$180.00							
03/08/2023	Mark Johnson (MTJ)	review order from Court of Appeal re paper copies of brief and excerpts of record	\$888.00	0.10		\$88.80									
03/08/2023	Mark Johnson (MTJ)	coms w/ GBW, LEC re same	\$888.00	0.10		\$88.80									
03/09/2023	Guy Wallace (GBW)	review and analysis of draft settlement proposal from CJH	\$1,188.00	0.50		\$594.00									
03/09/2023	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20		\$237.60									
03/13/2023	Lourdes Castro (LEC)	Checking documents delivered by Dalibor and comms with MTJ re same	\$450.00	0.80		\$360.00	0.8	\$360.00							
03/13/2023	Mark Johnson (MTJ)	review paper copies of brief and 10 volumes of excerpts of record for filing	\$888.00	1.00		\$888.00									
03/13/2023	Mark Johnson (MTJ)	discuss same and possible problem issues w/ L Castro	\$888.00	0.30		\$266.40									
03/13/2023	Mark Johnson (MTJ)	call to court clerk re same'	\$888.00	0.20		\$177.60									
03/13/2023	Mark Johnson (MTJ)	draft email to COC re status, issues and proposed filing	\$888.00	0.20		\$177.60									
03/14/2023	Lourdes Castro (LEC)	Preparing chambers copies for delivery to the court	\$450.00	0.50		\$225.00	0.5	\$225.00							
03/14/2023	Guy Wallace (GBW)	com's with CJH; KAS; BU; DTM re settlement	\$1,188.00	0.50		\$594.00									
03/15/2023	Guy Wallace (GBW)	legal research and analysis re recent Ninth Circuit decision in Katie Van	\$1,188.00	0.40		\$475.20									
03/15/2023	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20		\$237.60									
03/20/2023	Guy Wallace (GBW)	review and analysis of Appellant's reply brief	\$1,188.00	2.20		\$2,613.60									
03/20/2023	Mark Johnson (MTJ)	review defendant's reply brief	\$888.00	1.40		\$1,243.20									
03/21/2023	Rachel Steyer (RLS)	reading through appellants' reply brief	\$775.00	1.10		\$852.50	1.1	\$852.50							
03/21/2023	Guy Wallace (GBW)	review and analysis of Appellant's reply brief	\$1,188.00	0.70		\$831.60									
03/21/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Defendants' Reply brief	\$888.00	2.50		\$2,220.00									
03/21/2023	Travis Close (TCC)	Legal research re: factchecking Sunrise's standing arguments (citations to case law) in reply brief	\$888.00	1.80		\$1,598.40									
03/21/2023	Travis Close (TCC)	Review and analyze Sunrise's reply brief on appeal	\$888.00	1.30		\$1,154.40									
03/21/2023	Travis Close (TCC)	Review Olean (as cited in Def's reply brief) for cite accuracy and for proof requirements for rule 23(b) class certification	\$888.00	0.50		\$444.00									
03/21/2023	Guy Wallace (GBW)	review and analysis of Appellant's reply brief	\$1,188.00	0.70		\$831.60									
03/21/2023	Guy Wallace (GBW)	com's with MTJ; JAU re same	\$1,188.00	0.20		\$237.60									
03/21/2023	Mark Johnson (MTJ)	call w/ GBW re analysis of D's reply brief on 23(f) appeal, strategy for oral argument.	\$888.00	0.70		\$621.60									
03/22/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Look up date of oral argument	\$888.00	0.20		\$177.60									
03/22/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Defendant's Reply brief	\$888.00	0.50		\$444.00									
03/22/2023	Guy Wallace (GBW)	review and analysis of Appellant's reply brief	\$1,188.00	1.10		\$1,306.80									
03/22/2023	Guy Wallace (GBW)	com's with MTJ re same	\$1,188.00	0.20		\$237.60									
03/23/2023	Guy Wallace (GBW)	review and analysis of D's reply brief	\$1,188.00	1.90		\$2,257.20									
03/23/2023	Guy Wallace (GBW)	com's with CJH; MTJ re same	\$1,188.00	0.20		\$237.60									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
03/24/2023	Guy Wallace (GBW)	review and analysis of Defendant's reply brief and cases cited therein	\$1,188.00	2.90							
03/25/2023	Guy Wallace (GBW)	review and analysis of D's ARB and cases cited therein	\$1,188.00	1.60							
03/26/2023	Guy Wallace (GBW)	review and analysis of ARB and cases cited therein	\$1,188.00	3.20							
03/27/2023	Lourdes Castro (LEC)	Mailing out notice of related case	\$450.00	0.40			0.4	\$180.00			
03/27/2023	Guy Wallace (GBW)	preparation of notes re legal and factual points from the ARB that require response from Plaintiffs	\$1,188.00	1.30							
03/27/2023	Guy Wallace (GBW)	com's with CJH; BU; MTJ re same	\$1,188.00	0.20							
03/27/2023	Guy Wallace (GBW)	participate in zoom with CJH; BU; MTJ re Defendant's reply brief and preparation for oral argument	\$1,188.00	1.10							
03/27/2023	Guy Wallace (GBW)	com's with CJH; KAS; MTJ re settlement	\$1,188.00	0.40							
03/27/2023	Guy Wallace (GBW)	analysis of potential questions at oral argument	\$1,188.00	1.00							
03/27/2023	Guy Wallace (GBW)	com's with CJH; MTJ re same	\$1,188.00	0.20							
03/27/2023	Guy Wallace (GBW)	analysis of Defendant's argument that Article III requires an individualized showing of reliance on false or misleading statements	\$1,188.00	0.50							
03/27/2023	Mark Johnson (MTJ)	zoom mtg w/ C Healey, B Umpierre, GBW re Sunrise Reply brief arguments and response to same for oral argument prep.	\$888.00	1.10			1.1	\$976.80			
03/27/2023	Mark Johnson (MTJ)	calls w/ GBW re arguments made in Sunrise reply brief, responses to same	\$888.00	0.40							
03/28/2023	Guy Wallace (GBW)	legal research and analysis re Defendant's contention that Plaintiffs are required to show individualized reliance	\$1,188.00	1.20							
03/28/2023	Guy Wallace (GBW)	review and analysis of Vasquez; Occidental; Mass Mutual; Engalla decisions; Williston on Contracts; Restatement re same	\$1,188.00	1.10							
03/28/2023	Mark Johnson (MTJ)	calls w/ GBW re D's arguments in reply re need to prove reliance on an individual basis; precedent showing inference of reliance in common law fraud class actions	\$888.00	0.50							
03/28/2023	Mark Johnson (MTJ)	emails w/ GBW and C Healey re D's arguments in reply re need to prove reliance on an individual basis; precedent showing inference of reliance in common law fraud class actions	\$888.00	0.20							
03/29/2023	Mark Johnson (MTJ)	review email from C Healey re facts distinguishing D's floodgate scenarios for cellphone coverage, airline overbooking, delayed package delivery	\$888.00	0.60							
03/29/2023	Mark Johnson (MTJ)	draft email to Healey re same	\$888.00	0.20							
04/03/2023	Guy Wallace (GBW)	review and analysis of Defendant's Rule 28(j) letter	\$1,188.00	0.50							
04/04/2023	Guy Wallace (GBW)	com's with CJH; BU re Rule 28(j) letter	\$1,188.00	0.50							
04/04/2023	Guy Wallace (GBW)	draft response thereto	\$1,188.00	0.60							
04/06/2023	Travis Close (TCC)	Review and analyze appellants' reply brief	\$888.00	0.90							
04/06/2023	Guy Wallace (GBW)	com's with CJH re Rule 28(j) letter	\$1,188.00	0.50							
04/07/2023	Guy Wallace (GBW)	com's with CJH re CLRA claims and burden to show injury and quantify damages re same at class certification	\$1,188.00	0.80							
04/17/2023	Guy Wallace (GBW)	com's with CJH re argument that Plaintiffs were required to prepare a consumer survey or conjoint analysis	\$1,188.00	0.50							

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions									
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees		
							Hrs		Hrs		Hrs		Hrs		Hrs	
05/01/2023	Mark Johnson (MTJ)	review draft materials from Healey for moot argument	\$888.00	1.00		\$888.00										
05/03/2023	Guy Wallace (GBW)	com's with CJH re whether Defendants' sufficiently raised issues re consumer surveys and conjoint analysis for purposes of appeal	\$1,188.00	0.50		\$594.00										
05/11/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review email from GBW and C. Healey re research assignment	\$888.00	0.10		\$88.80										
05/11/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review memo re Clevenger in prep for research on same	\$888.00	1.30		\$1,154.40										
05/11/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Clevenger	\$888.00	0.50		\$444.00										
05/11/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review Zakaria	\$888.00	0.20		\$177.60										
05/11/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research whether Ninth Circuit has issued written opinions in area Clevenger - shepardize Zakaria	\$888.00	0.20		\$177.60										
05/11/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research whether Ninth Circuit has issued opinions on whether extrinsic evidence of materiality is required	\$888.00	0.10		\$88.80										
05/12/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research whether Ninth Circuit has issued opinions on whether extrinsic evidence of materiality is required	\$888.00	3.10		\$2,752.80										
05/12/2023	Guy Wallace (GBW)	legal research and analysis re Zakaria and subsequent cases re same	\$1,188.00	0.90		\$1,069.20										
05/18/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research whether extrinsic evidence necessary in overpayment cases	\$888.00	2.90		\$2,575.20										
05/18/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Shepardize Zakaria	\$888.00	0.70		\$621.60										
05/19/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research whether expert evidence necessary to establish Article III standing at class certification stage	\$888.00	2.10		\$1,864.80										
05/21/2023	Guy Wallace (GBW)	com's with CJH re preparation for oral argument	\$1,188.00	0.40		\$475.20										
05/22/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Research whether expert / extrinsic evidence needed for standing at class cert stage.	\$888.00	3.10		\$2,752.80										
05/23/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Draft email summarizing research findings to C. Healey and GBW	\$888.00	1.70		\$1,509.60										
05/23/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Finalize research re expert evidence needed for class cert re materiality or overpayment	\$888.00	0.80		\$710.40										
05/24/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Review email com's from GBW and C. Healey re expert quantification issues	\$888.00	0.10		\$88.80										
05/24/2023	Guy Wallace (GBW)	analysis of Defendants' argument re alleged distinction between goods and services for purposes of CLRA	\$1,188.00	0.30		\$356.40										
05/24/2023	Guy Wallace (GBW)	tc with JAU re same	\$1,188.00	0.20		\$237.60										
05/26/2023	Guy Wallace (GBW)	review and analysis of CJH memo re affirmative argument	\$1,188.00	0.70		\$831.60										
05/26/2023	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20		\$237.60										
05/28/2023	Guy Wallace (GBW)	preparation of questions for moot re oral argument	\$1,188.00	3.50		\$4,158.00										
5/29/2023	Guy Wallace (GBW)	preparation of questions for moot court re oral argument; review and analysis of CJH memo re Sunrise's arguments	\$1,188.00	2.60		\$3,088.80										
05/29/2023	Guy Wallace (GBW)	review and analysis of CJH memo re Sunrise's arguments	\$1,188.00	1.00		\$1,188.00										

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs		Hrs		Hrs		Hrs		
05/29/2023	Mark Johnson (MTJ)	call w GBW re moot argument on appeal and likely areas of inquiry from court, responses to same.	\$888.00	0.30		\$266.40									
05/30/2023	Guy Wallace (GBW)	zoom with CJH; MT; DTM; MAY; BU; MTJ re initial moot re preparation for oral argument	\$1,188.00	1.60		\$1,900.80			1.6		1,900.80				
05/30/2023	Guy Wallace (GBW)	com's with CJH; MO; MTJ re preparation for oral argument	\$1,188.00	0.80		\$950.40									
05/30/2023	Guy Wallace (GBW)	legal research and analysis re Kwikset decision and Article III injury in fact and common law test re fraud claims	\$1,188.00	0.60		\$712.80									
05/30/2023	Mark Johnson (MTJ)	moot court argument for hearing on 23(f) appeal with Healey, Wallace, Umpierre, Yarnall, others.	\$888.00	1.50		\$1,332.00									
05/30/2023	Mark Johnson (MTJ)	review memo re opening argument for moot session on 23(f) appeal	\$888.00	1.00		\$888.00									
06/04/2023	Guy Wallace (GBW)	review and analysis of CJH memo re responses to D's arguments and points in ARB	\$1,188.00	4.40		\$5,227.20									
06/05/2023	Guy Wallace (GBW)	review and analysis of CJH memo re Defendants' ARB and reply arguments; responses thereto	\$1,188.00	2.50		\$2,970.00									
06/06/2023	Guy Wallace (GBW)	review and analysis of CJH memo re responses to arguments and points in ARB	\$1,188.00	2.80		\$3,326.40									
06/07/2023	Guy Wallace (GBW)	review and analysis of CJH memo re responses to arguments and points in ARB	\$1,188.00	3.70		\$4,395.60									
06/07/2023	Guy Wallace (GBW)	legal research and analysis re same	\$1,188.00	2.00		\$2,376.00									
06/09/2023	Guy Wallace (GBW)	analysis of Sunrise's key arguments against class certification and Sunrise ARB	\$1,188.00	2.30		\$2,732.40									
06/09/2023	Guy Wallace (GBW)	preparation of responses thereto	\$1,188.00	1.00		\$1,188.00									
06/10/2023	Guy Wallace (GBW)	review and analysis of the Sunrise ARB	\$1,188.00	2.40		\$2,851.20									
06/10/2023	Guy Wallace (GBW)	review and analysis of CJH memo	\$1,188.00	0.50		\$594.00									
06/10/2023	Guy Wallace (GBW)	preparation of key issues and points for oral argument	\$1,188.00	1.60		\$1,900.80									
06/12/2023	Guy Wallace (GBW)	review and analysis of Defendants' reply arguments and points from ARB	\$1,188.00	2.40		\$2,851.20									
06/12/2023	Guy Wallace (GBW)	preparation of Plaintiffs' key points for oral argument	\$1,188.00	4.20		\$4,989.60									
06/12/2023	Guy Wallace (GBW)	com's with CJH re same (.4)	\$1,188.00	0.40		\$475.20									
06/13/2023	Lourdes Castro (LEC)	Locating document for GBW	\$450.00	1.40		\$630.00	1.4		\$630.00						
06/13/2023	Guy Wallace (GBW)	preparation and drafting of notes re oral argument	\$1,188.00	2.30		\$2,732.40									
06/13/2023	Guy Wallace (GBW)	review and analysis of CJH memo re affirmative argument	\$1,188.00	1.00		\$1,188.00									
06/13/2023	Guy Wallace (GBW)	review and analysis of district court order granting class certification	\$1,188.00	1.00		\$1,188.00									
06/14/2023	Guy Wallace (GBW)	preparation of revised memos for CJH re oral argument preparation	\$1,188.00	1.70		\$2,019.60									
06/14/2023	Guy Wallace (GBW)	preparation of comments re CJH memo re Defendants' reply points and arguments	\$1,188.00	2.40		\$2,851.20									
06/14/2023	Guy Wallace (GBW)	prepare for and participate in further moot re oral argument with CJH; MO; MT; DTM; BU; MAY	\$1,188.00	1.40		\$1,663.20									
06/15/2023	Guy Wallace (GBW)	review and analysis of CJH memo re Defendants' arguments and authorities from ARB	\$1,188.00	1.00		\$1,188.00									
06/15/2023	Guy Wallace (GBW)	preparation of comments re same	\$1,188.00	0.60		\$712.80									
06/15/2023	Guy Wallace (GBW)	com's with CJH re same (.2)	\$1,188.00	0.20		\$237.60									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
06/16/2023	Travis Close (TCC)	Email to GBW re: question about schedule for oral argument	\$888.00	0.20			\$177.60				
06/16/2023	Guy Wallace (GBW)	preparation of further questions and responses thereto for oral argument	\$1,188.00	2.40			\$2,851.20				
06/20/2023	Rachel Steyer (RLS)	attended Heredia moot	775	1.80		1.8	\$1,395.00				
06/20/2023	Guy Wallace (GBW)	prepare for and participate in in-person moot for oral argument with CJH; MO; DTM; MT; BU; MAY; RLS	\$1,188.00	4.10			\$4,870.80				
06/21/2023	Rachel Steyer (RLS)	reviewing notes circulated by BU summarizing moot	775	0.30		0.3	\$232.50				
07/02/2023	Guy Wallace (GBW)	review and analysis of further version of oral argument notes and answers to potential questions from CJH	\$1,188.00	1.30			\$1,544.40				
07/02/2023	Guy Wallace (GBW)	revise and edit same	\$1,188.00	1.00			\$1,188.00				
07/03/2023	Guy Wallace (GBW)	preparation of revised oral argument notes for CJH com's with CJH; MO re panel composition and analysis of same	\$1,188.00	1.00			\$1,188.00				
07/03/2023	Guy Wallace (GBW)	review and analysis of materials from CJH re Judge Donato and damages issues	\$1,188.00	0.20			\$237.60				
07/06/2023	Guy Wallace (GBW)	review and analysis of decisions by J. Donato re class certification and damages	\$1,188.00	3.40			\$4,039.20				
07/07/2023	Guy Wallace (GBW)	com's with CJH re death of Plaintiff Ganz and issues re standing for injunctive relief	\$1,188.00	1.20			\$1,425.60				
07/07/2023	Guy Wallace (GBW)	zoom with CJH; MO; BU re preparation for oral argument and panel members	\$1,188.00	0.30			\$356.40				
07/07/2023	Guy Wallace (GBW)	legal research and analysis re the passing of Ms. Ganz and issues regarding standing and mootness	\$1,188.00	0.50			\$594.00				
07/08/2023	Guy Wallace (GBW)	email to CJH; BU re same	\$1,188.00	1.30			\$1,544.40				
07/08/2023	Guy Wallace (GBW)	com's with CJH; BU re preparation for oral argument	\$1,188.00	0.20			\$237.60				
07/10/2023	Guy Wallace (GBW)	review and analysis of Defendants' argument re Bruno case cited by district court and P's arguments re same and reliance	\$1,188.00	0.80			\$950.40				
07/10/2023	Guy Wallace (GBW)	com's with CJH; MO re citation to materials re Dr. Flores that may not be in appellate record	\$1,188.00	0.50			\$594.00				
07/11/2023	Rachel Steyer (RLS)	watching Sunrise appellate argument	775	0.70		0.7	\$542.50				
07/11/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Locate live steam for oral argument	\$888.00	0.10			\$88.80				
07/11/2023	Jennifer Bybee (f/k/a Uhrowczik) (JAU)	Watch livestream of Ninth Circuit oral argument on Rule 23 motion	\$888.00	0.70			\$621.60				
07/11/2023	Travis Close (TCC)	Attend (virtually) oral arguments in front of Ninth Circuit on class cert appeal	\$888.00	2.20			\$1,953.60				
07/11/2023	Travis Close (TCC)	Email to GBW re: de-briefing after today's oral argument	\$888.00	0.40			\$355.20				
07/11/2023	Guy Wallace (GBW)	oral argument re Defendant's Rule 23(f) petition	\$1,188.00	0.90			\$1,069.20				
07/11/2023	Guy Wallace (GBW)	com's with CJH; MO; DTM; BU; MTJ; JAU re oral argument and analysis of of same	\$1,188.00	1.50			\$1,782.00				
07/11/2023	Mark Johnson (MTJ)	Watch live stream of oral argument on Rule 23f review	\$888.00	1.00			\$888.00				
07/11/2023	Mark Johnson (MTJ)	com w/ GBW re analysis of oral argument on 23(f) petition	\$888.00	0.70			\$621.60				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
						Hrs	Fees	Hrs	Fees	Hrs	Fees
07/13/2023	Guy Wallace (GBW)	com's with CJH; MO; BU re en banc petitions and rules re same		\$1,188.00	0.30						
07/14/2023	Lourdes Castro (LEC)	Locating document and sending it to GBW	450		0.40		\$180.00				
07/14/2023	Guy Wallace (GBW)	review and analysis of Defendant's 28(j) letter and Dinerstein case		\$1,188.00	1.10		\$1,306.80				
07/14/2023	Guy Wallace (GBW)	com's with CJH; MTJ re same and overall status of litigation and preparation for further discovery and trial		\$1,188.00	0.20		\$237.60				
07/17/2023	Guy Wallace (GBW)	review and analysis of draft letter responding to Defendant's 28(j) letter		\$1,188.00	0.20		\$237.60				
07/17/2023	Guy Wallace (GBW)	com's with CJH re same		\$1,188.00	0.20		\$237.60				
07/18/2023	Guy Wallace (GBW)	com's with CJH re Sunrise appeal; potential 28(j) letter		\$1,188.00	0.30		\$356.40				
07/21/2023	Guy Wallace (GBW)	com's with CJH; MAY; MTJ re settlement inquiry from Charlie Lee		\$1,188.00	0.40		\$475.20				
08/02/2023	Rachel Steyer (RLS)	reviewing appellate memorandum issued by CANC	775		0.20		\$155.00	0.2	\$155.00		
08/02/2023	Guy Wallace (GBW)	review and analysis of Memorandum from Ninth Circuit affirming class certification		\$1,188.00	0.60		\$712.80				
08/02/2023	Guy Wallace (GBW)	com's with CJH; MTJ re same		\$1,188.00	0.20		\$237.60				
08/02/2023	Travis Close (TCC)	Review and analyze ninth circuit's opinion affirming class cert decision.		\$888.00	0.30		\$266.40				
08/02/2023	Travis Close (TCC)	Review and analyze Seventh Circuit appeal decision (Dinerstein v. Google) shared by counsel for Defendants & attaching letter re:		\$888.00	0.90		\$799.20				
08/02/2023	Mark Johnson (MTJ)	review and analyze memorandum of decision on Rule 23f petition		\$888.00	0.50		\$444.00				
08/03/2023	Guy Wallace (GBW)	com's with CJH; TMS; MTJ re whether to request publication of opinion		\$1,188.00	0.70		\$831.60				
08/05/2023	Guy Wallace (GBW)	review and analysis of Ninth Circuit's opinion re Rule 23(f) appeal		\$1,188.00	1.60		\$1,900.80				
08/05/2023	Guy Wallace (GBW)	com's with MTJ re same		\$1,188.00	0.20		\$237.60				
08/08/2023	Travis Close (TCC)	Research recent appellate court opinions regarding viability of overpayment theories of injuries in consumer fraud cases		\$888.00	1.20		\$1,065.60				
08/22/2023	Guy Wallace (GBW)	review and analysis of CJH memos re proposed case schedule; remaining discovery and expert analyses		\$1,188.00	0.70		\$831.60				
08/22/2023	Guy Wallace (GBW)	zoom with CJH; BU re remaining discovery; proposed schedule; further motion practice		\$1,188.00	0.90		\$1,069.20				
08/29/2023	Travis Close (TCC)	Review and analyze draft memo & plans for post-appeal class discovery		\$888.00	0.40		\$355.20				
08/30/2023	Esther Bylsma (ELB)	Research re class certification.	985		2.00		\$1,970.00	2	\$1,970.00		
09/05/2023	Guy Wallace (GBW)	analysis of further tasks and actions on remand, including notice to the class; settlement possibility		\$1,188.00	0.30		\$356.40				
09/05/2023	Guy Wallace (GBW)	com's with CJH re same		\$1,188.00	0.20		\$237.60				
09/15/2023	Guy Wallace (GBW)	legal research and analysis re motion to modify class definition		\$1,188.00	1.20		\$1,425.60				
09/15/2023	Guy Wallace (GBW)	com's with CJH; BU re same		\$1,188.00	0.20		\$237.60				
09/26/2023	Rachel Steyer (RLS)	reviewing minute entry from Judge	775		0.10		\$77.50	0.1	\$77.50		

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions				
				Worked			General	CC Confs	Falkenberg	Travel	
<u>Fees</u>						Hrs	Fees	Hrs	Fees	Hrs	Fees
09/26/2023	Travis Close (TCC)	Review and analyze court's updated procedures in civil cases	\$888.00	0.40							
11/03/2023	Guy Wallace (GBW)	zoom with CJH; Stebner; Marks; Warren; MT; MAY re preparation for mediation and pretrial preparation	\$1,188.00	0.80							
11/07/2023	Lourdes Castro (LEC)	Locating document and emailing it to GBW	450	0.20		0.2	\$90.00				
11/07/2023	Gwendolyn Krause (GAK)	CASE RELATED - Heredia v Sunrise Cost report for Guy	270	0.60		0.6	\$162.00				
11/07/2023	Gwendolyn Krause (GAK)	CASE RELATED - Reworked Heredia v Sunrise cost report to combined origin entries that had been split between two matter classifications	270	0.30		0.3	\$81.00				
11/09/2023	Guy Wallace (GBW)	review and analysis of deal points; com's with CJH re same	\$1,188.00	0.20							
11/22/2023	Rachel Steyer (RLS)	reviewing plaintiffs request to court for status conference	775	0.10		0.1	\$77.50				
11/22/2023	Travis Close (TCC)	Review and analyze plaintiffs' request for status conference	\$888.00	0.20							
11/29/2023	Guy Wallace (GBW)	com's with CJH re trial preparation meeting; further expert analysis re Rule 26 reports and trial preparation	\$1,188.00	0.30							
11/30/2023	Rachel Steyer (RLS)	reviewing ECF order for joint status conference	775	0.10		0.1	\$77.50				
12/06/2023	Guy Wallace (GBW)	analysis of counter-proposal from Lee	\$1,188.00	0.60			\$712.80				
12/06/2023	Guy Wallace (GBW)	com's with CJH; KAS re same	\$1,188.00	0.20			\$237.60				
12/13/2023	Guy Wallace (GBW)	com's with CJH re mediation scheduled for January 2024	\$1,188.00	0.40			\$475.20				
12/18/2023	Guy Wallace (GBW)	review an analysis of draft mediation brief	\$1,188.00	0.40			\$475.20				
12/19/2023	Guy Wallace (GBW)	review and analysis of draft JI's prepared for mediation	\$1,188.00	0.40			\$475.20				
12/29/2023	Guy Wallace (GBW)	review and analysis of draft mediation brief	\$1,188.00	1.00			\$1,188.00				
12/29/2023	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20			\$237.60				
01/03/2024	Guy Wallace (GBW)	review and analysis of Defendants' mediation brief	\$1,188.00	0.70			\$831.60				
01/03/2024	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20			\$237.60				
01/05/2024	Guy Wallace (GBW)	review and analysis of Defendants' mediation brief	\$1,188.00	0.50			\$594.00				
01/05/2024	Guy Wallace (GBW)	com's with CJH; DTM; MAY; BU re same	\$1,188.00	0.20			\$237.60				
01/07/2024	Guy Wallace (GBW)	com's with CJH; BU re availability of expert fees under California state law	\$1,188.00	0.50			\$594.00				
01/07/2024	Guy Wallace (GBW)	legal research and analysis re same	\$1,188.00	0.40			\$475.20				
01/08/2024	Guy Wallace (GBW)	legal research and analysis re use of anecdotal or representative class member testimony in class actions regarding a defendant's policies or procedures	\$1,188.00	1.10			\$1,306.80				
01/09/2024	Guy Wallace (GBW)	legal research and analysis re use of anecdotal or representative class member testimony in class actions	\$1,188.00	0.50			\$594.00				
01/09/2024	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20			\$237.60				
01/10/2024	Guy Wallace (GBW)	com's with CJH; KAS re mediation and legal research and analysis re issues re anecdotal testimony and admissibility of same; Defendants' proposals re fees and costs; proposed injunctive relief	\$1,188.00	2.30			\$2,732.40				
01/11/2024	Guy Wallace (GBW)	com's with CJH; KAS; MTJ re mediator's proposal re settlement	\$1,188.00	0.50			\$594.00				
01/12/2024	Guy Wallace (GBW)	com's with CJH; BU re mediator's proposal and analysis of same	\$1,188.00	1.10			\$1,306.80				

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions								
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees	
<u>Fees</u>							Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees	
01/17/2024	Guy Wallace (GBW)	com's with CJH; KAS; DTM; MT; MAY re mediator's proposal and injunctive relief	\$1,188.00	1.10		\$1,306.80									
01/24/2024	Guy Wallace (GBW)	revise and edit draft brief re issue of class period	\$1,188.00	0.40		\$475.20									
01/24/2024	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20		\$237.60									
01/25/2024	Guy Wallace (GBW)	com's with co-counsel re schedule on mediator's proposal and terms re injunctive relief	\$1,188.00	0.20		\$237.60			0.2		237.6				
01/26/2024	Rachel Steyer (RLS)	reviewing status update entry re mediator's proposal	\$775.00	0.10		\$77.50	0.1	\$77.50							
01/26/2024	Rachel Steyer (RLS)	reviewing pleadings and supporting declarations re date of class period	\$775.00	0.50		\$387.50	0.5	\$387.50							
01/26/2024	Travis Close (TCC)	Review and analyze Pltf's statement re: termination date and applicable class period for class members	\$888.00	0.20		\$177.60									
01/26/2024	Travis Close (TCC)	Review and analyze Def's statement re: termination date and applicable class period for class members	\$888.00	0.30		\$266.40									
02/02/2024	Guy Wallace (GBW)	com's with CJH; KAS; DTM; MAY; BU re Defendants' injunctive relief proposal	\$1,188.00	0.50		\$594.00									
02/02/2024	Guy Wallace (GBW)	review and analysis of current draft of injunctive relief proposal	\$1,188.00	0.40		\$475.20									
02/07/2024	Rachel Steyer (RLS)	reviewing plaintiffs' position re termination of class date	\$775.00	0.30		\$232.50	0.3	\$232.50							
02/12/2024	Travis Close (TCC)	Review and analyze court's order setting class termination dater	\$888.00	0.20		\$177.60									
02/12/2024	Guy Wallace (GBW)	com's with CJH re update on settlement re terms of injunctive relief	\$1,188.00	0.20		\$237.60									
02/12/2024	Guy Wallace (GBW)	review and analysis of Order from J. Staton re class period	\$1,188.00	0.30		\$356.40									
02/15/2024	Guy Wallace (GBW)	com's with CJH re schedule on remand	\$1,188.00	0.20		\$237.60									
02/19/2024	Guy Wallace (GBW)	review and analysis of draft settlement agreement	\$1,188.00	0.90		\$1,069.20									
02/19/2024	Guy Wallace (GBW)	com's with CJH; KAS re same	\$1,188.00	0.20		\$237.60									
02/20/2024	Guy Wallace (GBW)	review and analysis of draft Settlement Agreement	\$1,188.00	1.50		\$1,782.00									
02/20/2024	Guy Wallace (GBW)	com's with CJH; TMS re same	\$1,188.00	0.20		\$237.60									
02/21/2024	Guy Wallace (GBW)	review and analysis of draft notice of settlement	\$1,188.00	0.20		\$237.60									
02/21/2024	Guy Wallace (GBW)	com's with CJH; TMS re settlement	\$1,188.00	0.20		\$237.60									
02/23/2024	Rachel Steyer (RLS)	reviewing statement regarding settlement negotiations	\$775.00	0.10		\$77.50	0.1	\$77.50							
02/23/2024	Travis Close (TCC)	Review and analyze parties' status report and recent communications re: settlement efforts	\$888.00	0.20		\$177.60									
03/01/2024	Guy Wallace (GBW)	com's with CJH re draft settlement agreement; response from Defendants; potential preliminary approval issues	\$1,188.00	0.30		\$356.40									
03/07/2024	Guy Wallace (GBW)	review and analysis of legal standards re preliminary approval	\$1,188.00	0.50		\$594.00									
03/09/2024	Guy Wallace (GBW)	legal research and analysis re Grady; Ninth Circuit decisions in Briseno; Roes 1-2; Koby and Campbell and the valuation of injunctive relief	\$1,188.00	1.20		\$1,425.60									
03/18/2024	Guy Wallace (GBW)	review and analysis of Sunrise redline of proposed settlement agreement	\$1,188.00	0.60		\$712.80									
03/18/2024	Guy Wallace (GBW)	com's with CJH; KAS re same	\$1,188.00	0.20		\$237.60									
03/19/2024	Guy Wallace (GBW)	review and analysis of proposed com's with Defendants re settlement	\$1,188.00	0.10		\$118.80									

Date	Timekeeper	Task Description	Hourly Rate	Hours		Fees	Lodestar Reductions									
				Worked			General	Fees	CC Confs	Fees	Falkenberg	Fees	Travel	Fees		
							Hrs		Hrs		Hrs		Hrs		Hrs	
03/19/2024	Guy Wallace (GBW)	com's with CJH; BU re same	\$1,188.00	0.20		\$237.60										
03/22/2024	Guy Wallace (GBW)	com's with CJH re draft settlement agreement; Defendants' proposed changes and responses thereto	\$1,188.00	0.50		\$594.00										
03/24/2024	Guy Wallace (GBW)	analysis of remaining issues re settlement agreement	\$1,188.00	0.30		\$356.40										
03/24/2024	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20		\$237.60										
03/25/2024	Travis Close (TCC)	Review and analyze motion for substitution & accompanying declarations	\$888.00	0.20		\$177.60										
03/27/2024	Guy Wallace (GBW)	review and analysis of Defendants' latest redline of draft settlement agreement	\$1,188.00	0.50		\$594.00										
03/27/2024	Guy Wallace (GBW)	com's with CJH; KAS re same	\$1,188.00	0.20		\$237.60										
03/28/2024	Travis Close (TCC)	Review and analyze parties' joint statement re: settlement efforts	\$888.00	0.10		\$88.80										
04/03/2024	Guy Wallace (GBW)	review and analysis of emails from CJH re preliminary approval motion and potential class member declarations re same	\$1,188.00	0.20		\$237.60										
04/03/2024	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20		\$237.60										
04/08/2024	Guy Wallace (GBW)	review and analysis of draft Declaration of Fearn re settlement	\$1,188.00	0.40		\$475.20										
04/08/2024	Guy Wallace (GBW)	com's with CJH; BU re same	\$1,188.00	0.20		\$237.60										
04/09/2024	Guy Wallace (GBW)	review and analysis of draft of preliminary approval motion; declarations of Plaintiffs	\$1,188.00	1.20		\$1,425.60										
04/09/2024	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20		\$237.60										
04/12/2024	Guy Wallace (GBW)	review and analysis of draft preliminary approval brief	\$1,188.00	0.40		\$475.20										
04/12/2024	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20		\$237.60										
04/17/2024	Travis Close (TCC)	Review and analyze motion for prelim approval of class action settlement & supporting exhibits	\$888.00	0.80		\$710.40										
04/17/2024	Travis Close (TCC)	Review and analyze settlement agreement	\$888.00	0.50		\$444.00										
04/17/2024	Guy Wallace (GBW)	review and analysis of preliminary approval motion; declaration of Dr. Kennedy	\$1,188.00	0.30		\$356.40										
04/17/2024	Guy Wallace (GBW)	com's with CJH re same	\$1,188.00	0.20		\$237.60										
04/25/2024	Guy Wallace (GBW)	com's with CJH re preliminary approval motion	\$1,188.00	0.30		\$356.40										
05/30/2024	Guy Wallace (GBW)	com's with CJH re preliminary approval hearing	\$1,188.00	0.40		\$475.20										
06/14/2024	Travis Close (TCC)	Review and analyze plaintiffs' further clarification in support of motion for prelim approval & accompanying exhibits	\$888.00	0.30		\$266.40										
07/26/2024	Guy Wallace (GBW)	review and analysis of order granting preliminary approval of settlement	\$1,188.00	0.50		\$594.00										
07/26/2024	Guy Wallace (GBW)	com's with CJH; KAS; MTJ re same	\$1,188.00	0.20		\$237.60										
08/01/2024	Guy Wallace (GBW)	analysis of com's from Jaffe	\$1,188.00	0.30		\$356.40										
08/01/2024	Guy Wallace (GBW)	com's with CJH re same and potential objection to settlement	\$1,188.00	0.20		\$237.60										
08/02/2024	Guy Wallace (GBW)	com's with CJH re Statement of California and conference with Jaffe re proposed settlement	\$1,188.00	0.40		\$475.20										
08/05/2024	Travis Close (TCC)	Review and analyze court's order conditionally granting prelim approval of class action settlement	\$888.00	0.60		\$532.80										
08/05/2024	Travis Close (TCC)	Review and analyze parties' status report re settlement	\$888.00	0.20		\$177.60										

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Lodestar Reductions</u>							
				<u>Worked</u>	<u>Fees</u>	General		CC Confs		Falkenberg		Travel	
<u>Fees</u>						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
		Total Lodestar			2,816,322.90								
		Lodestar Reductions			(365,547.74)								
						Perct	100%	100%	30.00%	30.00%	100.00%	100.00%	50.00%
						Subt	499.9	\$332,252	9.18	\$8,725	24.4	\$24,571	0
		Net Lodestar			2,450,775.16								
						Total	533	\$365,548					

Costs

Client-Related Meals	\$	300.32
Relativity - Document Management	\$	272,425.62
Judicate West - Discovery Referee	\$	47,175.00
Experts	\$	210,146.95
Pacer Charges	\$	1,446.10
Westlaw/Lexis	\$	7,763.01
Copies/Postage	\$	1,446.25
Court Services	\$	374.00
Court Reporter	\$	7,303.90
Total	\$	548,381.15

TRAILS

Trails Law Group - Lodestar Fees/Costs

Fees

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fee (Hourly Rate x Hours Worked)	Lodestar Reductions				Travel Hrs	Travel Fees	
						General Hrs	General Fees	CC Confs Hrs	CC Confs Fees			Falkenberg Hrs
5/1/2024	SW	Analyze: Worked on fees summary for fee application.	\$650.00	0.5000	\$325.00	0.5		325				
4/22/2024	SW	Analyze: Review and analyze case filings.	\$650.00	0.1000	\$65.00	0.1		65				
3/19/2024	SW	Analyze: Review and analyze critical terms of settlement agreement.	\$650.00	0.1000	\$65.00	0.1		65				
2/28/2024	SW	Analyze: Review and analyze Court order on status of settlement.	\$650.00	0.1000	\$65.00	0.1		65				
2/23/2024	SW	Analyze: Review and analyze status report.	\$650.00	0.1000	\$65.00	0.1		65				
2/21/2024	SW	Analyze: Review and analyze settlement agreement.	\$650.00	0.5000	\$325.00	0.5		325				
2/12/2024	SW	Correspondence: Case correspondence related to injunction terms; review order on date of class period.	\$650.00	0.1000	\$65.00	0.1		65				
2/12/2024	SW	Review and analyze order on date of class period.	\$650.00	0.1000	\$65.00	0.1		65				
2/8/2024	SW	Analyze: Review and analyze injunction modifications.	\$650.00	0.1000	\$65.00	0.1		65				
2/5/2024	SW	Analyze: Review and analyze order denying application to file under seal.	\$650.00	0.1000	\$65.00	0.1		65				
2/2/2024	SW	Analyze: Review and analyze declaration regarding class period filed under seal.	\$650.00	0.2000	\$130.00	0.2		130				
2/2/2024	SW	Participated in case call regarding injunction strategy.	\$650.00	0.3000	\$195.00	0.3		195				
2/1/2024	SW	Analyze: Review and analyze revisions to the draft injunction	\$650.00	0.1000	\$65.00	0.1		65				
1/30/2024	SW	Analyze: Review proposed injunction	\$650.00	0.1000	\$65.00	0.1		65				
1/29/2024	SW	Analyze: Review and analyze briefing on class period	\$650.00	0.3000	\$195.00	0.3		195				
1/19/2024	SW	Analyze: Review and analyze brief on class period	\$650.00	0.1000	\$65.00	0.1		65				
1/17/2024	SW	Consultation: Conference call regarding settlement strategy.	\$650.00	1.0000	\$650.00				1		650	
1/17/2024	SW	Confer with Attorney Healey regarding fees on injunction and caselaw in support of same.	\$650.00	0.2000	\$130.00							
1/16/2024	SW	Analyze: Review and analyze caselaw on fees in class action cases in support of team call on settlement strategy.	\$650.00	0.2000	\$130.00							
1/5/2024	SW	Consultation: Participated in joint call for mediation preparation	\$650.00	0.8000	\$520.00	0.8		520				
1/3/2024	SW	Analyze: Review and analyze mediation brief and provide suggestions on same to Mr. Healey	\$650.00	0.6000	\$390.00							
12/19/2023	SW	Draft Documents: Review and revise mediation brief	\$650.00	0.5000	\$325.00							
12/4/2023	SW	Draft Documents: Worked on revisions to mediation brief.	\$650.00	1.2000	\$780.00							
12/4/2023	SW	Email correspondence with Mr. Healey regarding same.	\$650.00	0.2000	\$130.00							
11/10/2023	SW	Analyze: Review settlement demand and back-up	\$650.00	0.1000	\$65.00	0.1		65				
11/8/2023	SW	Research: Worked on former employee research	\$650.00	0.7000	\$455.00							
11/6/2023	SW	Research: Research on employee reviews to try and located potential declarants on short staffing	\$650.00	0.8000	\$520.00							
11/3/2023	SW	Correspondence: Participated in call regarding mediation and investigation next steps.	\$650.00	0.5000	\$325.00	0.5		325				
11/3/2023	SW	Employee review investigation.	\$650.00	0.9000	\$585.00	0.9		585				
11/2/2023	SW	Analyze: Review class list and letter explaining update.	\$650.00	0.1000	\$65.00	0.1		65				
10/2/2023	SW	Correspondence: Review and analyze case correspondence related to settlement strategy	\$650.00	0.1000	\$65.00	0.1		65				
9/5/2023	SW	Analyze: Review and analyze mandate and updated discovery schedule.	\$650.00	0.1000	\$65.00	0.1		65				
8/24/2023	SW	Analyze: Review and analyze case correspondence related to trial preparation and needed discovery	\$650.00	0.1000	\$65.00	0.1		65				
8/2/2023	SW	Analyze: Review and analyze 9th Circuit opinion	\$650.00	0.1000	\$65.00	0.1		65				
7/17/2023	SW	Analyze: Review and analyze letter brief response on new Seventh Circuit case on standing	\$650.00	0.1000	\$65.00	0.1		65				
5/30/2023	SW	Analyze: Review and analyze appellate preparation materials	\$650.00	0.2000	\$130.00	0.2		130				
5/25/2023	SW	Review: Review and analyze oral argument outline and organize thoughts on same.	\$650.00	1.3000	\$845.00							
5/25/2023	SW	Confer with Attorney Healey on argument.	\$650.00	0.3000	\$195.00							
3/14/2023	SW	Correspondence: Participated in conference call regarding settlement strategy.	\$650.00	0.4000	\$260.00				0.4		260	
4/29/2022	SW	Correspondence: Case correspondence related to work on appeal and issues for class consideration on future harm question.	\$650.00	0.1000	\$65.00							
4/8/2022	SW	Analyze: Analyze case correspondence related to class member outreach.	\$650.00	0.1000	\$65.00							
2/24/2022	SW	Analyze: Review and analyze case correspondence related to referee recommendation on depositions and class data	\$650.00	0.1000	\$65.00							
2/18/2022	SW	Analyze: Review and analyze order from discovery special master.	\$650.00	0.3000	\$195.00							
2/14/2022	SW	Analyze: Review and analyze plan for Motion for Summary Judgment opposition and trial preparation	\$650.00	0.1000	\$65.00							
1/28/2022	SW	Analyze: Review and analyze joint stipulation to amend scheduling order.	\$650.00	0.1000	\$65.00							
1/25/2022	SW	Correspondence: Email correspondence with Mr. Healey regarding pre-trial dates.	\$650.00	0.1000	\$65.00							
1/13/2022	SW	Discovery: Email correspondence with Mr. Umpierre regarding summary of complaints and clawback of certain complaint files	\$650.00	0.2000	\$130.00							
12/21/2021	SW	Analyze: Review and analyze status report	\$650.00	0.1000	\$65.00	0.1		65				
12/13/2021	SW	Analyze: Review and analyze proposed class notice for short and long form and brief on opposition to appeal	\$650.00	0.4000	\$260.00	0.4		260				
11/16/2021	SW	Analyze: Review and analyze order on class certification	\$650.00	0.3000	\$195.00	0.3		195				
10/21/2021	SW	Analyze: Analyze new trial dates and prepare trial schedule and checklist	\$650.00	0.4000	\$260.00	0.4		260				
8/24/2021	SW	Analyze: Review and analyze case filings.	\$650.00	0.1000	\$65.00	0.1		65				
6/28/2021	SW	Analyze: Review and analyze Sunrise filing	\$650.00	0.1000	\$65.00	0.1		65				
6/2/2021	SW	Correspondence: Conference call with plaintiff team regarding settlement and expert strategy	\$650.00	1.2000	\$780.00				1.2		780	
4/28/2021	SW	Analyze: Review and analyze discovery letter	\$650.00	0.1000	\$65.00	0.1		65				

Fees

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fee (Hourly Rate x Hours Worked)	Lodestar Reductions				Falkenberg Hrs	Falkenberg Fees	Travel Hrs	Travel Fees
						General Hrs	General Fees	CC Confs Hrs	CC Confs Fees				
4/19/2021	SW	Analyze: Review and analyze latest update from data expert	\$650.00	0.1000	\$65.00								
4/6/2021	SW	Analyze: Review and update trial deadlines memorandum.	\$650.00	0.5000	\$325.00								
3/30/2021	SW	Correspondence: Email correspondence with Attorney Healey regarding pre-trial dates.	\$650.00	0.1000	\$65.00								
3/17/2021	SW	Analyze: Email correspondence regarding limits of privilege for inhouse counsel	\$650.00	0.2000	\$130.00								
3/17/2021	SW	Analyze: Continued analysis of trial dates	\$650.00	0.1000	\$65.00								
3/10/2021	SW	Correspondence: Review and analyze case correspondence	\$650.00	0.1000	\$65.00								
3/9/2021	SW	Research: Researched and analyzed Court rules, Local Rules and court orders to determine trial schedule and pre-trial dates	\$650.00	4.2000	\$2,730.00								
3/8/2021	SW	Draft Documents: Revise motion on class certification (amended).	\$650.00	1.1000	\$715.00								
3/1/2021	SW	Discovery: Provided comments on 30(b)(6) notice.	\$650.00	0.1000	\$65.00								
2/26/2021	SW	Analyze: Analyze Protective Order issues for trial.	\$650.00	0.1000	\$65.00								
2/26/2021	SW	Correspondence: Conference call with Attorney Thamer regarding trial schedule	\$650.00	0.4000	\$260.00								
2/25/2021	SW	Correspondence: Conference with Attorney Healey regarding trial dates.	\$650.00	0.1000	\$65.00								
2/18/2021	SW	Discovery: Worked on adding topics to 30(b)(6) deposition notice	\$650.00	0.4000	\$260.00								
2/16/2021	SW	Correspondence - Client:Conference call with the Falkenbergs and Mr. Johnson regarding arbitration approach.	\$650.00	0.3000	\$195.00						0.3		195
2/15/2021	SW	Discovery: Review new discovery requests for possible additions; review class definition research	\$650.00	0.3000	\$195.00								
2/12/2021	SW	Correspondence: Conference call with co-counsel regarding preparation for call with the Falkenbergs regarding next steps in case.	\$650.00	0.1000	\$65.00						0.1		65
2/12/2021	SW	Correspondence: Participated in conference calls regarding discovery and class definiton.	\$650.00	0.8000	\$520.00			0.8		520			
2/11/2021	SW	Correspondence: Email correspondence with team regarding Falkenberg response to arbitration and set up new call with the Falkenbergs.	\$650.00	0.4000	\$260.00						0.4		260
2/10/2021	SW	Correspondence: Conference call with Attorney Healey regarding class definition and opposition to arbitration.	\$650.00	0.3000	\$195.00								
2/9/2021	SW	Analyze: Review and analyze order on Class Certification	\$650.00	0.1000	\$65.00								
2/9/2021	SW	Correspondence - Client: Prepare for and have conference call with the Falkenbergs regarding Motion to Compel Arbitration	\$650.00	0.9000	\$585.00						0.9		585
2/9/2021	SW	Discovery: Review revised discovery and email with team regarding additions to request.	\$650.00	0.2000	\$130.00								
2/8/2021	SW	Research: Continued work on potential Opposition to Motion to Compel Arbitration and potential request to stay.	\$650.00	1.9000	\$1,235.00								
2/8/2021	SW	Analyze: Review and analyze case correspondence.	\$650.00	0.2000	\$130.00								
2/8/2021	SW	Conference call with Mr. Johnson and Healey regarding arbitration Opposition.	\$650.00	0.5000	\$325.00	0.2		130					
2/4/2021	SW	Research: Researched standards and impact on stay and whether denial of Motion to Compel Arbitration allows stay in Heredia.	\$650.00	3.0000	\$1,950.00								
2/4/2021	SW	Conference with Attorney Healey regarding same.	\$650.00	0.2000	\$130.00								
2/3/2021	SW	Research: Research on arbitration enforcement standards and CLRA payor requirements	\$650.00	1.8000	\$1,170.00								
2/2/2021	SW	Correspondence: Reviewed Central District jury trial status and arbitration discovery	\$650.00	0.1000	\$65.00								
2/1/2021	SW	Correspondence: Conference call with Attorney Umpierre regarding arbitration opposition and documents.	\$650.00	0.2000	\$130.00								
2/1/2021	SW	Review status of discovery responses to arbitration related discovery.	\$650.00	0.2000	\$130.00								
2/1/2021	SW	Correspondence: Conference call with Attorneys Healey and Umpierre regarding arbitration discovery and second call with Attorney Healey regarding discovery on payors.	\$650.00	0.7000	\$455.00								
1/29/2021	SW	Discovery: Analyzed potential discovery requests in support of opposition to Motion to Compel Arbitration	\$650.00	0.3000	\$195.00								
1/28/2021	SW	Research: Continued research on arguments in opposition to Motion to Compel Arbitration based on opt out provisions	\$650.00	1.2000	\$780.00								
1/27/2021	SW	Correspondence: Continued research on implementation of stay in class cases with arbitration of certain claims and class members	\$650.00	1.6000	\$1,040.00								
1/26/2021	SW	Correspondence: Exchanged email correspondence with co-counsel regarding Walker deposition exhibits.	\$650.00	0.2000	\$130.00								
1/22/2021	SW	Research: Research arbitration and process on consolidation and stay.	\$650.00	0.4000	\$260.00								
1/21/2021	SW	Research: Researched standard for stay in class cases related to Motions to Compel Arbitration	\$650.00	1.2000	\$780.00								
1/14/2021	SW	Research: Continued research on stay standard and examples where stay was denied in class action context and arbitration.	\$650.00	2.7000	\$1,755.00								
1/13/2021	SW	Research: Researched standards for stay in relation to Motion to Compel Arbitration in class action context (consolidated cases and relate	\$650.00	4.3000	\$2,795.00								
1/8/2021	SW	Correspondence: Prepare for and have conference call on Opposition to Motion to Compel Arbitration	\$650.00	0.9000	\$585.00								
1/7/2021	SW	Research: Research cases on mass arbitration.	\$650.00	1.9000	\$1,235.00								
1/7/2021	SW	Conference with Attorney Healey regarding arbitration standards and Opposition to Motion to Compel.	\$650.00	0.2000	\$130.00								
1/7/2021	SW	Conference with Attorney Johnson regarding Opposition.	\$650.00	0.2000	\$130.00								
12/14/2020	SW	Correspondence: Participated in Plaintiffs' counsel call regarding discovery plan, expert plan and arbitration response	\$650.00	1.5000	\$975.00						1.5		975
12/7/2020	SW	Analyze: Review and analyze claw-back letter response and review of additional documents produced with attorney included on email cor	\$650.00	0.6000	\$390.00								
12/4/2020	SW	Draft Documents: Drafted meet and confer regarding claimed privileged materials and researched limits on attorney-client privilege assert	\$650.00	1.4000	\$910.00								
12/3/2020	SW	Correspondence: Conference call with Attorney Thamer and AL Wizard expert and summarized same.	\$650.00	1.0000	\$650.00								
12/2/2020	SW	Correspondence: Conference call with AL wizard expert	\$650.00	0.2000	\$130.00								
11/23/2020	SW	Draft Documents: Continued work on review of AHCA applications for Reply evidence	\$650.00	0.5000	\$325.00								
11/22/2020	SW	Draft Documents: Collected information from AHCA applications in support for Reply for Class Certification.	\$650.00	0.8000	\$520.00								
11/19/2020	SW	Correspondence: Call to AL Wizard representative (message).	\$650.00	0.1000	\$65.00								
11/19/2020	SW	Discovery: Worked on research related to claw back request and limits on attorney client privilege for non attorney work and research on information stated in AHCA applications.	\$650.00	0.8000	\$520.00								
11/17/2020	SW	Discovery: Participated in deposition on Tom Berry	\$650.00	0.7000	\$455.00								
11/16/2020	SW	Discovery: Prepared for Berry deposition.	\$650.00	1.0000	\$650.00								
11/13/2020	SW	Discovery: Prepare for Berry deposition and review discovery responses.	\$650.00	0.2000	\$130.00								
11/12/2020	SW	Discovery: Continued preparation for Berry deposition	\$650.00	0.2000	\$130.00								

Fees

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fee (Hourly Rate x Hours Worked)	Lodestar Reductions				Falkenberg Hrs	Falkenberg Fees	Travel Hrs	Travel Fees
						General Hrs	General Fees	CC Confs Hrs	CC Confs Fees				
11/11/2020	SW	Discovery: Continued preparation for Berry deposition including document collection and questions	\$650.00	0.4000	\$260.00								
11/10/2020	SW	Discovery: Worked on preparation for Berry deposition	\$650.00	0.6000	\$390.00								
11/3/2020	SW	Discovery: Continued to draft expert deposition summary(economist).	\$650.00	1.2000	\$780.00	0.6		390					
11/2/2020	SW	Discovery: Drafted summary of expert deposition.	\$650.00	1.0000	\$650.00								
11/2/2020	SW	Correspondence: Review and analyze case correspondence	\$650.00	0.1000	\$65.00	0.1		65					
10/30/2020	SW	Discovery: Participated in expert deposition of Dr. Walker	\$650.00	6.1000	\$3,965.00								
10/29/2020	SW	Discovery: Conference with Attorney Healey regarding Walker deposition.	\$650.00	0.3000	\$195.00								
10/29/2020	SW	Review Kennedy declaration in support of deposition preparation and prepare for deposition.	\$650.00	1.0000	\$650.00								
10/27/2020	SW	Discovery: Researched articles regarding search criteria for use in expert deposition.	\$650.00	2.0000	\$1,300.00								
10/27/2020	SW	Worked on remote deposition logistics.	\$650.00	0.1000	\$65.00	0.1		65					
10/27/2020	SW	Email correspondence with Gibson Dunn regarding locations of witness and counsel.	\$650.00	0.1000	\$65.00								
10/27/2020	SW	Worked on legal analysis of requirements of econometric analysis.	\$650.00	2.0000	\$1,300.00								
10/27/2020	SW	Drafted questions for deposition of Dr. Walker.	\$650.00	0.5000	\$325.00								
1.7 10/26/2020	SW	Discovery: Prepared for expert deposition of Dr. Walker including review of case materials, opinions and Walker background documents.	\$650.00	3.4000	\$2,210.00	1.7		1105					
10/26/2020	SW	Correspondence: Review and analyze case correspondence	\$650.00	0.1000	\$65.00								
10/23/2020	SW	Discovery: Walker deposition preparation including review of past work and opinions	\$650.00	1.4000	\$910.00								
10/21/2020	SW	Discovery: Prepared for Walker deposition.	\$650.00	0.7000	\$455.00								
10/20/2020	SW	Discovery: Provided information on documents in support of deposition preparation.	\$650.00	0.3000	\$195.00								
10/14/2020	SW	Analyze: Review and analyze report from Special Master on request for ISP information.	\$650.00	0.1000	\$65.00								
10/12/2020	SW	Correspondence: Review and analyze case correspondence and Berry deposition preparation materials.	\$650.00	0.7000	\$455.00								
10/10/2020	SW	Discovery: Reviewed and collected documents for Berry deposition preparation.	\$650.00	0.2000	\$130.00								
10/9/2020	SW	Discovery: Assisted with preparation for Berry deposition.	\$650.00	1.0000	\$650.00	0.5		325					
10/9/2020	SW	Discovery: Continued review of Sunrise documents for representations related to memory care.	\$650.00	0.1000	\$65.00								
10/9/2020	SW	Discovery: Review case correspondence and assist with Berry deposition preparation.	\$650.00	0.8000	\$520.00								
10/8/2020	SW	Discovery: Continued review of Sunrise documents for representations related to dementia and Alzheimer care.	\$650.00	1.1000	\$715.00								
10/8/2020	SW	Correspondence: Email correspondence with co-counsel regarding documents submitted to the state on staffing procedures.	\$650.00	0.6000	\$390.00								
10/7/2020	SW	Discovery: Review and analyze documents produced by Sunrise for information related to Alzheimer's representations.	\$650.00	0.8000	\$520.00								
10/5/2020	SW	Discovery: Conference with Attorney Healey regarding evidence of budget pressure and documents in support of same.	\$650.00	0.2000	\$130.00								
10/5/2020	SW	Review documents on staffing procedures for Berry deposition.	\$650.00	1.8000	\$1,170.00	0.9		585					
10/2/2020	SW	Discovery: Reviewed and constructed staffing material packets for Berry deposition.	\$650.00	0.2000	\$130.00								
10/1/2020	SW	Discovery: Worked on preparation for Berry deposition.	\$650.00	1.5000	\$975.00								
10/1/2020	SW	Conference with Attorney Foss regarding same.	\$650.00	0.2000	\$130.00								
9/30/2020	SW	Correspondence: Provided deposition documents to co-counsel.	\$650.00	0.1000	\$65.00	0.1		65					
9/28/2020	SW	Correspondence: Review and analyze case correspondence.	\$650.00	0.1000	\$65.00								
9/25/2020	SW	Discovery: Continued review of executive director depositions for reference to electronic data entry.	\$650.00	2.1000	\$1,365.00								
9/24/2020	SW	Discovery: Continued review of executive director deposition transcripts for reference to electronic data entry.	\$650.00	0.3000	\$195.00								
9/24/2020	SW	Correspondence: Email correspondence with Mr. Healey regarding dates on staffing procedure documents.	\$650.00	0.1000	\$65.00								
9/24/2020	SW	Research on staffing procedure documents.	\$650.00	0.2000	\$130.00								
9/23/2020	SW	Correspondence: Participated in conference call regarding strategy on reply in support of Motion for Class Certification.	\$650.00	0.7000	\$455.00				0.7		455		
9/22/2020	SW	Discovery: Continued review of executive director deposition transcripts for reference to electronic data entry.	\$650.00	0.7000	\$455.00								
9/21/2020	SW	Correspondence: Email correspondence with Mr. Healey regarding staffing process and reference to same in marketing materials.	\$650.00	0.1000	\$65.00								
9/21/2020	SW	Discovery: Continued review of executive director transcripts for reference to electronic data entry.	\$650.00	0.8000	\$520.00	0.8		520					
9/18/2020	SW	Discovery: Review and analyze executive director transcripts for mention of entry of electronic date related to provision of care.	\$650.00	0.3000	\$195.00								
9/17/2020	SW	Discovery: Reviewed and provided deposition outlines from executive director and PMK depositions.	\$650.00	2.1000	\$1,365.00	1		650					
9/17/2020	SW	Correspondence: Review and analyze case correspondence.	\$650.00	0.1000	\$65.00	0.1		65					
9/16/2020	SW	Discovery: Prepare for and participate in Sunrise team call regarding deposition of opposing declarants.	\$650.00	1.0000	\$650.00				1		650		
9/9/2020	SW	Research: Research limits on equitable relief and related damages claims under consumer protection laws.	\$650.00	1.5000	\$975.00								
9/8/2020	SW	Analyze: Review and analyze memorandum on staffing representations.	\$650.00	0.1000	\$65.00								
8/31/2020	SW	Analyze: Review and analyze case correspondence.	\$650.00	0.1000	\$65.00								
8/17/2020	SW	Draft Documents: Drafted table summary of variable staffing references.	\$650.00	0.8000	\$520.00								
8/14/2020	SW	Discovery: Review and analyze staffing documents and discretion on same, including caselaw.	\$650.00	1.3000	\$845.00								
8/13/2020	SW	Correspondence: Conference with Attorney Yarnall regarding review of representations on staffing.	\$650.00	0.2000	\$130.00								
8/13/2020	SW	Conference with Attorney Healey regarding same and caselaw on binding representations.	\$650.00	0.3000	\$195.00								
8/12/2020	SW	Discovery: Continued review and analysis of documents produced by Sunrise or related to Sunrise regarding target staffing.	\$650.00	1.0000	\$650.00								
8/11/2020	SW	Discovery: Continued review of documents for representations made on target staffing in public documents or other documents circulated	\$650.00	1.9000	\$1,235.00	1.9		1235					
8/10/2020	SW	Discovery: Continued review of date questions for Attorney Healey regarding date of representations made on staffing targets.	\$650.00	1.6000	\$1,040.00	1.6		1040					
8/7/2020	SW	Discovery: Continued review of documents produced by Sunrise for representations related to target staffing.	\$650.00	1.0000	\$650.00								
8/7/2020	SW	Correspondence: Review and analyze case correspondence.	\$650.00	0.1000	\$65.00	0.1		65					
8/5/2020	SW	Correspondence: Participated in conference call regarding reply brief in support of class certification and potential discovery motions.	\$650.00	1.0000	\$650.00				1		650		

Fees

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fee (Hourly Rate x Hours Worked)	Lodestar Reductions				Falkenberg Hrs	Falkenberg Fees	Travel Hrs	Travel Fees
						General Hrs	General Fees	CC Confs Hrs	CC Confs Fees				
8/5/2020	SW	Analyze: Review and analyze case correspondence.	\$650.00	0.1000	\$65.00								
8/5/2020	SW	Draft reply brief.	\$650.00	0.1000	\$65.00								
8/4/2020	SW	Analyze: Review and analyze documents for references to target staffing requirements.	\$650.00	0.4000	\$260.00								
8/4/2020	SW	Analyze: Review and analyze case correspondence regarding declarant depositions.	\$650.00	0.1000	\$65.00								
8/3/2020	SW	Discovery: Reviewed and analyzed Sunrise documents for references to target staffing requirements.	\$650.00	1.5000	\$975.00								
8/3/2020	SW	Discovery: Review and analyze defendant's response to Request for Production.	\$650.00	0.1000	\$65.00								
7/31/2020	SW	Discovery: Continued review of Sunrise materials for public statements related to target staffing.	\$650.00	1.0000	\$650.00	0.1		65					
7/30/2020	SW	Discovery: Continued review of Sunrise materials for public statements related to and relying on target staffing process.	\$650.00	3.0000	\$1,950.00	0.3		195					
7/29/2020	SW	Discovery: Continued review and analysis of documents referencing target staffing obligations and public statements on same.	\$650.00	0.8000	\$520.00								
7/28/2020	SW	Analyze: Review and analyze new order on class certification and deposition schedule.	\$650.00	0.1000	\$65.00								
7/28/2020	SW	Discovery: Review and analyze documents produced by Sunrise regarding staffing representations in public documents.	\$650.00	3.8000	\$2,470.00								
7/21/2020	SW	Correspondence: Conference call with Ms. Yarnall regarding review of staffing promises and statements in public materials.	\$650.00	0.4000	\$260.00								
7/21/2020	SW	Draft Documents: Revise meet and confer letter regarding arbitration discovery.	\$650.00	0.1000	\$65.00								
7/20/2020	SW	Analyze: Review and analyze case email correspondence regarding confidential software programs for task time studies and data.	\$650.00	0.1000	\$65.00								
7/20/2020	SW	Draft Documents: Drafted meet and confer portion of letter regarding failure to produce arbitration related materials.	\$650.00	1.7000	\$1,105.00								
7/17/2020	SW	Discovery: Conference call with Attorney Healey regarding discovery matters and review special interrogatory responses.	\$650.00	0.3000	\$195.00								
7/17/2020	SW	Analyze: Review and analyze opposition to ex parte on time extension for briefing.	\$650.00	0.1000	\$65.00								
7/17/2020	SW	Analyze: Review and analyze Plaintiffs' brief on discovery referee.	\$650.00	0.1000	\$65.00								
7/15/2020	SW	Analyze: Review and analyze case correspondence.	\$650.00	0.1000	\$65.00	0.1		65					
7/13/2020	SW	Correspondence: Participated in conference call regarding discovery, new class representatives and depositions.	\$650.00	0.9000	\$585.00				0.9		585		
7/13/2020	SW	Analyze: Review and analyze case correspondence.	\$650.00	0.1000	\$65.00	0.1		65					
7/10/2020	SW	Discovery: Drafted additional discovery requests related to arbitration agreement.	\$650.00	1.0000	\$650.00								
7/10/2020	SW	Analyze: Review and analyze daily pleadings.	\$650.00	0.4000	\$260.00	0.4		260					
7/9/2020	SW	Research: Worked on arbitration research and arguments in opposition to same.	\$650.00	0.5000	\$325.00								
7/1/2020	SW	Research: Research related to new arbitration decision and limits due to FAA rules and California exceptions.	\$650.00	0.8000	\$520.00								
6/30/2020	SW	Research: Worked on arbitration analysis related to FAA exemptions.	\$650.00	0.1000	\$65.00								
6/25/2020	SW	Research: Continued research on application of Harris decision (no arbitration for senior living) and possible use in Sunrise case.	\$650.00	1.6000	\$1,040.00								
6/23/2020	SW	Draft Documents: Continued to work on arbitration insert regarding unconscionability and other arguments to defeat motion to compel ar	\$650.00	2.4000	\$1,560.00								
6/21/2020	SW	Drafting: Drafted inserts into opposition to compel arbitration related to lack of rules and unilateral provisions.	\$650.00	3.0000	\$1,950.00								
6/19/2020	SW	Research: Continued research on arbitration decisions and FAA exclusions and applicability; research on unconscionability.	\$650.00	3.1000	\$2,015.00	1.5		975					
6/18/2020	SW	Research: Continued research on unconscionability standards for arbitration agreements and application of new arbitration decision on senior living home and FAA exclusions.	\$650.00	1.2000	\$780.00								
6/17/2020	SW	Research: Continued research on unconscionability standards as related to one sided agreements and lack of rules applied.	\$650.00	1.0000	\$650.00	1		650					
6/15/2020	SW	Correspondence: Participated in plaintiffs' team call regarding next steps with experts and planning for reply brief.	\$650.00	0.1000	\$65.00				0.1		65		
6/15/2020	SW	Research: Continued research on standards for unconscionability of arbitration agreements.	\$650.00	1.2000	\$780.00								
6/9/2020	SW	Analyze: Review and analyze daily pleadings.	\$650.00	0.1000	\$65.00	0.1		65					
6/9/2020	SW	Discovery: Drafted Requests for Production related to document requests in support of challenge to arbitration agreements.	\$650.00	0.6000	\$390.00								
6/9/2020	SW	Correspondence: Conference call with Ms. Erickson regarding opposition to Motion to Compel Arbitration and unconscionability agrument	\$650.00	0.4000	\$260.00								
6/9/2020	SW	Research: Worked on research related to arbitration challenge and unconscionability standards.	\$650.00	0.6000	\$390.00								
6/8/2020	SW	Analyze: Review and analyze new decision on arbitration and senior living facilities, review new Request for Production and case correspoi	\$650.00	0.7000	\$455.00								
6/5/2020	SW	Analyze: Review and analyze documents produced by Sunrise for references to arbitration and explanation of arbitration to residents.	\$650.00	2.3000	\$1,495.00								
6/4/2020	SW	Correspondence: Email correspondence with Ms. Erikson regarding Executive Director transcript and testimony on arbitration agreement.	\$650.00	0.1000	\$65.00								
6/3/2020	SW	Analyze: Review and analyze meet and confer letter regarding ESI.	\$650.00	0.1000	\$65.00								
6/3/2020	SW	Draft Documents: Continued research on standards for unconscionability in support of opposition to motion compel arbitration.	\$650.00	1.8000	\$1,170.00								
6/2/2020	SW	Discovery: Drafted portion of meet and confer letter related to request for Shiferaw materials.	\$650.00	0.5000	\$325.00								
6/2/2020	SW	Analyze: Researched support of opposition to potential motion to compel arbitration.	\$650.00	0.5000	\$325.00								
6/2/2020	SW	Review ESI proposed protocol and provide feedback on same.	\$650.00	0.2000	\$130.00								
6/1/2020	SW	Correspondence: Conference with Ms. Erikson regarding strategy in response to potential Motion to Compel Arbitration.	\$650.00	0.5000	\$325.00								
6/1/2020	SW	Analyze: Worked on opposition to arbitration arguments.	\$650.00	0.6000	\$390.00								
5/29/2020	SW	Correspondence: Prepare for conference call regarding strategy on arbitration challenge to class motion.	\$650.00	0.2000	\$130.00								
5/29/2020	SW	Participate in conference call regarding strategy on arbitration challenge to class motion.	\$650.00	1.1000	\$715.00				1.1		845		Broke down 1.3 time entry
5/28/2020	SW	Correspondence: Email correspondence with co-counsel regarding arbitration background information.	\$650.00	0.3000	\$195.00								
5/28/2020	SW	Analyze: Review and analyze background on R. Lochman and place call.	\$650.00	0.4000	\$260.00								
5/28/2020	SW	Analyze: Review and analyze case correspondence.	\$650.00	0.1000	\$65.00								
5/19/2020	SW	Discovery: Review filing on class certification and draft email correspondence for Attorney Healey to send regarding claw back request.	\$650.00	0.6000	\$390.00								
5/18/2020	SW	Discovery: Exchanged email correspondence with Attorneys Healey and Cocchia regarding whether interrogatories can seek names of pari	\$650.00	0.2000	\$130.00								
5/17/2020	SW	Draft Documents: Final review of Yarnell declaration and exhibits for class certification.	\$650.00	0.2000	\$130.00								
5/16/2020	SW	Drafting: Review and proof declaration and exhibits regarding complaint materials for class certification briefing.	\$650.00	0.6000	\$390.00								
5/15/2020	SW	Discovery: Review request to clawback documents and impact on class certification exhibits.	\$650.00	0.2000	\$130.00								

Fees

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fee (Hourly Rate x Hours Worked)	Lodestar Reductions				Travel Hrs	Fees
						General Hrs	Fees	CC Confs Hrs	Fees		
5/15/2020	SW	Correspondence: Participated in team conference call regarding logistics and strategy for class certification filing.	\$650.00	0.3000	\$195.00						
5/15/2020	SW	Discovery: Review updated exhibits for 30(b)(6) deposition and respond to team questions regarding deposition exhibits.	\$650.00	0.2000	\$130.00			0.3		845	
5/14/2020	SW	Discovery: Conference call with Attorney Healey regarding exhibit 29 to 30(b)(6) depositions and email changes re exhibits to court report	\$650.00	0.2000	\$130.00						
5/12/2020	SW	Discovery: Worked on exhibits for class certification motion.	\$650.00	0.9000	\$585.00	0.9		585			
5/12/2020	SW	Conference with Attorney Healey regarding deposition exhibits.	\$650.00	0.2000	\$130.00						
5/12/2020	SW	Calls with Court reporter regarding changing deposition exhibits.	\$650.00	0.1000	\$65.00						
5/12/2020	SW	Drafted further meet and confer requests on changing exhibits.	\$650.00	0.3000	\$195.00						
5/11/2020	SW	Discovery: Continued work on meet and confer efforts regarding 30(b)(6) deposition exhibits.	\$650.00	0.8000	\$520.00						
5/11/2020	SW	Email correspondence with court reporter service regarding deposition exhibits.	\$650.00	0.1000	\$65.00						
5/11/2020	SW	Discovery: Reviewed Slicta deposition summary.	\$650.00	1.5000	\$975.00	1.5		975			
5/8/2020	SW	Discovery: Participated in meet and confer regarding deposition exhibits.	\$650.00	0.2000	\$130.00						
5/8/2020	SW	Conference with Attorney Healey regarding deposition exhibits.	\$650.00	0.2000	\$130.00						
5/8/2020	SW	Worked on response to Sunrise regarding deposition exhibits.	\$650.00	0.4000	\$260.00						
5/7/2020	SW	Discovery: Worked on meet and confer with Sunrise's attorneys regarding finalizing deposition exhibits.	\$650.00	0.7000	\$455.00						
5/7/2020	SW	Discovery: Conference with Attorney Healey regarding deposition exhibits and changes to same.	\$650.00	0.1000	\$65.00						
5/7/2020	SW	Worked on making changes and finalizing exhibits.	\$650.00	0.4000	\$260.00	0.4		260			
5/5/2020	SW	Correspondence: Reviewed case correspondence related to ESI productions.	\$650.00	0.1000	\$65.00						
5/5/2020	SW	Correspondence: Email correspondence with counsel for Sunrise regarding finalizing 30(b)(6) deposition transcript.	\$650.00	0.3000	\$195.00						
4/30/2020	SW	Discovery: Attended and assisted with deposition of Sunrise 30(b)(6) witness.	\$650.00	9.5000	\$6,175.00						
4/30/2020	SW	Discovery: Prepared for 30(b)(6) deposition including outline review and deposition logistics.	\$650.00	0.7000	\$455.00						
4/29/2020	SW	Discovery: Prepared for deposition and worked on deposition logistics.	\$650.00	1.5000	\$975.00	1.5		975			
4/29/2020	SW	Discovery: Provided example of best complaint for Attorney Healey and questions on same for deposition preparation.	\$650.00	0.6000	\$390.00						
4/29/2020	SW	Correspondence: Case correspondence on deposition logistics.	\$650.00	0.2000	\$130.00						
4/28/2020	SW	Discovery: Drafted deposition questions for 30(b)(6) deposition.	\$650.00	2.8000	\$1,820.00						
4/27/2020	SW	Analyze: Review and analyze correspondence from counsel for Sunrise regarding 30(b)(6) deposition.	\$650.00	0.1000	\$65.00						
4/27/2020	SW	Correspondence: Conference call with Attorney Healey regarding deposition logistics.	\$650.00	0.1000	\$65.00						
4/27/2020	SW	Draft Documents: Revise class certification brief and declaration insert and burden on document production as to evidentiary standards.	\$650.00	2.7000	\$1,755.00						
4/26/2020	SW	Drafting: Updated summary of complaints and reviewed Sunrise documents for additional complaints.	\$650.00	4.1000	\$2,665.00						
4/24/2020	SW	Correspondence: Conference call with Attorney Healey regarding deposition preparation and document review for deposition.	\$650.00	0.4000	\$260.00						
4/24/2020	SW	Correspondence: Email correspondence to counsel for Sunrise regarding request for logistics for remote deposition.	\$650.00	0.1000	\$65.00						
4/23/2020	SW	Correspondence: Conference with Attorney Healey regarding deposition questions and preparation.	\$650.00	0.1000	\$65.00						
4/23/2020	SW	Correspondence: Participated in conference call regarding class certification work and strategy for motion.	\$650.00	0.9000	\$585.00			0.9		585	
4/22/2020	SW	Discovery: Review and analyze Sunrise marketing statements and materials produced in discovery in support of deposition preparation.	\$650.00	1.6000	\$1,040.00						
4/22/2020	SW	Discovery: Continued review and analysis of Sunrise complaint documents.	\$650.00	0.5000	\$325.00	0.5		325			
4/21/2020	SW	Analyze: Revised summary of Sunrise complaints.	\$650.00	0.2000	\$130.00						
4/20/2020	SW	Correspondence: Email correspondence to counsel for Sunrise regarding deposition details and process for remote deposition.	\$650.00	0.1000	\$65.00						
4/20/2020	SW	Analyze: Review and analyze privilege logs.	\$650.00	0.1000	\$65.00						
4/20/2020	SW	Analyze: Review, analyze and summarize complaints produced by Sunrise in discovery and available on the internet.	\$650.00	2.9000	\$1,885.00						
4/20/2020	SW	Analyze: Review and analyze case correspondence.	\$650.00	0.2000	\$130.00						
4/16/2020	SW	Correspondence: Conference call with Attorney Healey regarding next steps on class certification and deposition preparation.	\$650.00	0.7000	\$455.00						
4/16/2020	SW	Correspondence: Review and analyze case correspondence.	\$650.00	0.1000	\$65.00						
4/15/2020	SW	Discovery: Review and analyze materials produced by Plaintiffs related to Sunrise management structure.	\$650.00	0.8000	\$520.00						
4/15/2020	SW	Discovery: Review survey data produced by Sunrise.	\$650.00	0.1000	\$65.00						
4/10/2020	SW	Drafting: Drafted insert for meet and confer letter addressing failure to produce ESI on complaints, surveys, and marketing materials.	\$650.00	1.1000	\$715.00						
4/9/2020	SW	Discovery: Review and analyze Plaintiffs' supplemental responses to Request for Production.	\$650.00	0.1000	\$65.00						
4/9/2020	SW	Discovery: Drafted insert for meet and confer letter regarding Sunrise's failure to produce ESI related to complaints and surveys.	\$650.00	1.8000	\$1,170.00						
4/9/2020	SW	Correspondence: Review and analyze case correspondence.	\$650.00	0.2000	\$130.00						
4/8/2020	SW	Discovery: Drafted summary of complaints from Sunrise production documents for use with class certification motion.	\$650.00	3.0000	\$1,950.00						
4/7/2020	SW	Discovery: Conference call with litigation support regarding review of survey materials for analysis.	\$650.00	0.1000	\$65.00	0.1		65			
4/7/2020	SW	Discovery: Drafted insert for meet and confer demand letter related to missing complaints and marketing information.	\$650.00	1.4000	\$910.00						
4/6/2020	SW	Correspondence: Conference call with Attorney Cochia regarding strategy for meet and confer with Gibson on ESI.	\$650.00	0.3000	\$195.00						
4/6/2020	SW	Review documents in support of meet and confer.	\$650.00	1.3000	\$845.00						
4/3/2020	SW	Correspondence: Prepared for and participated in conference call regarding needed ESI production and strategy for meet and confer.	\$650.00	0.8000	\$520.00			0.8		520	
4/3/2020	SW	Draft Documents: Continued to review Sunrise complaint materials and draft brief insert and supporting declaration regarding complaint c	\$650.00	3.3000	\$2,145.00						
4/2/2020	SW	Discovery: Drafted class certification motion insert related to complaints and online reviews.	\$650.00	2.0000	\$1,300.00						
4/1/2020	SW	Discovery: Review and analyze complaints produced by Sunrise in support of class certification evidence.	\$650.00	4.1000	\$2,665.00	2		1300			
4/1/2020	SW	Correspondence: Review and analyze case correspondence on deposition preparation and class certification briefing.	\$650.00	0.1000	\$65.00						
3/31/2020	SW	Correspondence: Email to Sunrise's defense counsel regarding remote deposition logistics.	\$650.00	0.3000	\$195.00						
3/31/2020	SW	Analyze: Conference with Attorney Healey regarding 30(b)(6) deposition preparation.	\$650.00	0.2000	\$130.00						

Fees

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fee (Hourly Rate x Hours Worked)	Lodestar Reductions				Falkenberg Hrs	Falkenberg Fees	Travel Hrs	Travel Fees
						General Hrs	General Fees	CC Confs Hrs	CC Confs Fees				
3/31/2020	SW	Discovery: Review and analyze documents produced by Sunrise for complaint materials in support of class certification.	\$650.00	1.4000	\$910.00								
3/30/2020	SW	Discovery: Review and analyze complaint materials, marketing materials and other documents produced by Sunrise in support of class certification and deposition preparation for 30(b)(6).	\$650.00	3.4000	\$2,210.00	1.7	1105						
3/29/2020	SW	Discovery: Review and analyze complaint documents in support of class certification.	\$650.00	0.5000	\$325.00								
3/27/2020	SW	Consultation: Consult with remote deposition services provider and test run same.	\$650.00	0.7000	\$455.00	0.7	455						
3/27/2020	SW	Analyze: Review and analyze complaints produced by Sunrise in support of class certification motion.	\$650.00	1.0000	\$650.00								
3/26/2020	SW	Discovery: Review and analyze documents produced by Sunrise in support of deposition preparation and class certification.	\$650.00	2.9000	\$1,885.00								
3/25/2020	SW	Discovery: Review and analyze documents produced by Sunrise in support of deposition preparation and class certification.	\$650.00	2.5000	\$1,625.00								
3/25/2020	SW	Correspondence: Conference call with co-counsel's team regarding deposition preparation and needs for remote deposition.	\$650.00	0.3000	\$195.00			0.3	195				
3/24/2020	SW	Analyze: Review and analyze draft class certification brief in support of document review and collection.	\$650.00	1.5000	\$975.00								
3/24/2020	SW	Responded to email correspondence regarding deposition preparation questions.	\$650.00	0.2000	\$130.00								
3/23/2020	SW	Analyze: Review and analyze case correspondence related to deposition location and video conference plan.	\$650.00	0.1000	\$65.00								
3/20/2020	SW	Discovery: Review and confirm availability of previous deposition exhibits for use at 30(b)(6) deposition.	\$650.00	0.1000	\$65.00								
3/19/2020	SW	Correspondence: Exchanged email correspondence regarding Motion to Compel documents and missing documents.	\$650.00	0.1000	\$65.00								
3/19/2020	SW	Correspondence: Email correspondence regarding exhibit preparation for 30(b)(6) deposition.	\$650.00	0.3000	\$195.00								
3/19/2020	SW	Correspondence: Participated in strategy call regarding class certification and 30(b)(6) deposition and follow-up call on deposition exhibits.	\$650.00	0.2000	\$130.00								
3/19/2020	SW	Discovery: Reviewed documents in support of class certification motion and 30(b)(6) deposition.	\$650.00	1.2000	\$780.00								
3/18/2020	SW	Analyze: Review and analyze case correspondence.	\$650.00	0.1000	\$65.00								
3/18/2020	SW	Correspondence: Conference call with co-counsel regarding CCL information for Sunrise facilities and class member information.	\$650.00	0.5000	\$325.00			0.5	325				
3/17/2020	SW	Analyze: Reviewed documents in support of deposition preparation for 30(b)(6) deposition.	\$650.00	0.4000	\$260.00								
3/14/2020	SW	Analyze: Review and analyze Zack deposition transcript.	\$650.00	0.4000	\$260.00								
3/12/2020	SW	Analyze: Reviewed and analyzed documents produced by Sunrise in support of class certification brief and 30(b)(6) deposition.	\$650.00	0.5000	\$325.00								
3/12/2020	SW	Discovery: Exchanged email correspondence with co-counsel regarding 30(b)(6) deposition preparation.	\$650.00	0.1000	\$65.00								
3/12/2020	SW	Discovery: Exchanged email correspondence with co-counsel regarding document index and use of same for depositions.	\$650.00	0.2000	\$130.00								
3/9/2020	SW	Correspondence: Provided information about adverse incidents and outcomes at Sunrise facilities to co-counsel.	\$650.00	0.3000	\$195.00								
3/9/2020	SW	Analyze: Review and analyze case correspondence related to Plaintiffs' production and 30(b)(6) deposition.	\$650.00	0.1000	\$65.00								
3/3/2020	SW	Correspondence: Participated in conference call regarding class certification motion strategy and steps in discovery to meet strategy.	\$650.00	0.7000	\$455.00			0.7	455				
3/2/2020	SW	Discovery: Review and analyze Defendants' response to Request for Production Set Four.	\$650.00	0.1000	\$65.00								
3/2/2020	SW	Analyze: Review and analyze loan materials from defendants in support of class certification.	\$650.00	0.1000	\$65.00								
2/28/2020	SW	Analyze: Review and analyze order on ex parte request to modify Protective Order.	\$650.00	0.1000	\$65.00								
2/28/2020	SW	Analyze: Review and analyze opposition to ex parte on Protective Order modifications.	\$650.00	0.1000	\$65.00								
2/21/2020	SW	Correspondence: Review and analyze case correspondence related to class certification.	\$650.00	0.1000	\$65.00								
2/20/2020	SW	Correspondence: Conference with Attorney Healey regarding documents and evidence needed in support of class certification.	\$650.00	0.4000	\$260.00								
2/20/2020	SW	Draft Documents: Review and analyze draft motion for class certification and revisions to same.	\$650.00	1.6000	\$1,040.00								
2/14/2020	SW	Correspondence: Reviewed and analyze case correspondence.	\$650.00	0.1000	\$65.00								
2/12/2020	SW	Discovery: Review email case correspondence regarding next steps with discovery meet and confer.	\$650.00	0.1000	\$65.00								
2/10/2020	SW	Correspondence: Exchanged email correspondence with Attorney Healey regarding website representations and resource guide.	\$650.00	0.4000	\$260.00								
2/7/2020	SW	Discovery: Conference with Attorney Healey regarding deposition preparation for 30(b)(6) deposition and documents needed for same.	\$650.00	0.2000	\$130.00								
2/7/2020	SW	Research: Researched materials on R. Lochman for potential witness contact.	\$650.00	0.3000	\$195.00								
2/7/2020	SW	Analyze: Review and analyze Ganz transcript.	\$650.00	0.1000	\$65.00								
2/6/2020	SW	Analyze: Reviewed and analyze facility citation data.	\$650.00	0.1000	\$65.00								
2/6/2020	SW	Correspondence: Review case related email correspondence.	\$650.00	0.1000	\$65.00								
2/4/2020	SW	Correspondence: Review and respond to case emails on discovery and Executive Director histories.	\$650.00	0.2000	\$130.00								
2/4/2020	SW	Correspondence: Conference call with Attorney Thamer regarding potential witness interview and review materials related to witness.	\$650.00	0.5000	\$325.00								
2/3/2020	SW	Analyze: Review and analyze information on third-party investors and respond to case correspondence.	\$650.00	0.3000	\$195.00								
2/2/2020	SW	Analyze: Review and analyze Ganz documents.	\$650.00	0.4000	\$260.00								
1/29/2020	SW	Analyze: Review and analyze meet and confer update.	\$650.00	0.1000	\$65.00								
1/23/2020	SW	Correspondence: Conference call with Attorney Cocchia regarding hearing on Motion to Compel and review Court's tentative order.	\$650.00	0.4000	\$260.00								
1/23/2020	SW	Analyze: Review and analyze unredacted brief in support of Motion to Compel.	\$650.00	0.1000	\$65.00								
1/22/2020	SW	Discovery: Review and analyze commission materials produced by Sunrise.	\$650.00	0.1000	\$65.00								
1/21/2020	SW	Discovery: Participated in discovery meet and confer regarding production of missing documents identified by witnesses.	\$650.00	0.3000	\$195.00								
1/21/2020	SW	Confer with Attorneys Healey and Cocchia regarding follow-up with Plaintiff on missing documents.	\$650.00	0.4000	\$260.00								
1/21/2020	SW	Discovery: Drafted Request for Production.	\$650.00	1.4000	\$910.00								
1/20/2020	SW	Correspondence: Participated in conference call with Attorney Healey and staffing expert regarding data needed to review staffing and de	\$650.00	1.4000	\$910.00								
1/20/2020	SW	Discovery: Prepare for call with Attorney Marks in support of class certification.	\$650.00	0.1000	\$65.00								
1/20/2020	SW	Discovery: Review and analyze deposition notes and preparatory work for additional Requests for Production and review second set of Requests for Production in support of meet and confer approach.	\$650.00	3.1000	\$2,015.00								
1/17/2020	SW	Discovery: Reviewed proposed ESI search terms and custodians and added terms and custodians based on Executive Director depositions.	\$650.00	1.4000	\$910.00								

Fees

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fee (Hourly Rate x Hours Worked)	Lodestar Reductions				Travel Hrs	Fees		
						General Hrs	Fees	CC Confs Hrs	Fees			Falkenberg Hrs	Fees
1/16/2020	SW	Draft Documents: Drafted expert engagement letter and revised 30(b)(6) deposition notice.	\$650.00	1.9000	\$1,235.00								
1/15/2020	SW	Analyze: Review and analyze papers filed in support of Motion to Seal Reply in support of Motion to Compel.	\$650.00	0.1000	\$65.00								
1/15/2020	SW	Discovery: Participated in conference call regarding outstanding discovery and class certification strategy.	\$650.00	0.7000	\$455.00			0.7	455				
1/14/2020	SW	Discovery: Sent email correspondence regarding request for ESI search terms.	\$650.00	0.2000	\$130.00								
1/13/2020	SW	Research: Researched JD Power representations on website materials and standards for same for use in class certification argument.	\$650.00	0.7000	\$455.00								
1/13/2020	SW	Analyze: Review and analyze case correspondence and ongoing discovery needs related to documents.	\$650.00	0.2000	\$130.00								
1/10/2020	SW	Discovery: Prepare for and participate in second Executive Director deposition.	\$650.00	9.0000	\$5,850.00								
1/10/2020	SW	Travel to and from second deposition of Executive Director.	\$650.00	4.0000	\$2,600.00						4	2,600	
1/9/2020	SW	Discovery: Prepared for deposition of second Sunrise Executive Director.	\$650.00	4.5000	\$2,925.00								
1/9/2020	SW	Analyze: Review and analyze reply in support of Motion Compel.	\$650.00	0.3000	\$195.00								
1/7/2020	SW	Discovery: Prepared for and participated in deposition of Sunrise facility Executive Director.	\$650.00	11.0000	\$7,150.00								
1/7/2020	SW	Discovery: Travel to and from deposition of Executive Director	\$650.00	4.0000	\$2,600.00						4	2,600	
1/6/2020	SW	Discovery: Participated in meet and confer telephonic regarding ESI protocol for production.	\$650.00	0.3000	\$195.00								
1/6/2020	SW	Discovery: Deposition preparation including review of deposition exhibits and ordering and marking same.	\$650.00	0.3000	\$195.00								
1/6/2020	SW	Discovery: Reviewing and analyze documents for use as deposition exhibits.	\$650.00	0.8000	\$520.00								
1/3/2020	SW	Analyze: Drafted deposition questions for use in Executive Director depositions and documents for same.	\$650.00	5.1000	\$3,315.00								
1/2/2020	SW	Consultation: Prepare for and participate in deposition preparation meeting with Attorney Healey.	\$650.00	2.0000	\$1,300.00	0.3	195						
1/2/2020	SW	Travel to and from deposition preparation meeting with Attorney Healey	\$650.00	0.5	\$325.00						0.5	325.00	
1/2/2020	SW	Analyze: Review and analyze documents produced by Sunrise in support of Executive Director deposition preparation.	\$650.00	4.3000	\$2,795.00								
12/31/2019	SW	Analyze: Review and analyze documents produced by Sunrise including multiple operations plans in support of deposition preparation.	\$650.00	3.2000	\$2,080.00								
12/30/2019	SW	Analyze: Document review of operation plans and complaints and claims and other materials produced by Sunrise in support of depositor	\$650.00	4.0000	\$2,600.00								
12/30/2019	SW	Participated in team conference call regarding deposition preparation and strategy for depositions.	\$650.00	0.4000	\$260.00			0.4	260				
12/30/2019	SW	Email correspondence with Attorney Cocchia regarding redacted documents.	\$650.00	0.1000	\$65.00								
12/29/2019	SW	Analyze: Review and analyze documents produced by Sunrise (marketing, claims, plans, etc.) in support of deposition preparation.	\$650.00	3.6000	\$2,340.00								
12/27/2019	SW	Analyze: Review and analyze documents produced including operations plans for deposition preparation.	\$650.00	4.6000	\$2,990.00								
12/24/2019	SW	Drafting: Drafted deposition outline.	\$650.00	0.2000	\$130.00								
12/23/2019	SW	Analyze: Review and analyze case correspondence related to document productions and key docs.	\$650.00	0.1000	\$65.00								
12/23/2019	SW	Analyze: Continued to draft deposition outline and review of key documents for deposition preparation.	\$650.00	0.6000	\$390.00								
12/22/2019	SW	Analyze: Analyze documents for deposition preparation.	\$650.00	2.0000	\$1,300.00								
12/22/2019	SW	Draft related questions for deposition.	\$650.00	0.5000	\$325.00								
12/20/2019	SW	Analyze: Review and analyze documents produced by Sunrise and online information for deposition preparation.	\$650.00	0.9000	\$585.00								
12/19/2019	SW	Analyze: Review and analyze documents for deposition preparation.	\$650.00	2.5000	\$1,625.00								
12/19/2019	SW	Draft questions regarding same.	\$650.00	0.5000	\$325.00								
12/19/2019	SW	Review and analyze meet and confer on status of ESI.	\$650.00	0.1000	\$65.00								
12/18/2019	SW	Correspondence: Participated in deposition preparation meeting with Attorney Healey.	\$650.00	2.7000	\$1,755.00								
12/18/2019	SW	Travel to and from deposition preparation meeting.	\$650.00	0.5000	\$325.00						0.5	325	
12/18/2019	SW	Review order on Motion to Dismiss and Motion to Strike for Court view on class allegations.	\$650.00	0.2000	\$130.00								
12/17/2019	SW	Analyze: Review and analyze documents produced by Sunrise in support of deposition preparation and review online reviews for Sunrise facilities as posted on consumer and employee websites.	\$650.00	4.5000	\$2,925.00								
12/16/2019	SW	Analyze: Review and analyze documents produced by Sunrise in support of deposition preparation.	\$650.00	3.6000	\$2,340.00								
12/13/2019	SW	Analyze: Continued to review and analyze documents for deposition preparation.	\$650.00	2.3000	\$1,495.00								
12/12/2019	SW	Research: Research on rules on discovery conduct and exhibits in the Central District.	\$650.00	1.9000	\$1,235.00								
12/12/2019	SW	Review interview materials and caselaw on deposition conduct in the Central District.	\$650.00	0.6000	\$390.00								
12/10/2019	SW	Correspondence: Conference call with Attorney Thamer regarding deposition preparation.	\$650.00	1.9000	\$1,235.00								
12/10/2019	SW	Correspondence: Conference call with plaintiffs' team regarding deposition strategy and preparation.	\$650.00	1.0000	\$650.00			1.0000	\$650.00				
12/9/2019	SW	Analyze: Review and analyze Motion to Compel and review and analyze deposition outline for use in preparations strategy.	\$650.00	0.6000	\$390.00								
12/6/2019	SW	Analyze: Exchanged email correspondence regarding coding and document review questions.	\$650.00	0.1000	\$65.00								
12/6/2019	SW	Review and analyze meet and confer regarding discovery and deposition dates and review Magistrate Judge rules on meet and confer con	\$650.00	0.3000	\$195.00								
12/5/2019	SW	Analyze: Review and analyze documents produced by Sunrise in support of deposition preparation and review and analyze Sunrise's class	\$650.00	2.1000	\$1,365.00								
12/5/2019	SW	Conference call with Attorney Johnson regarding Relativity database.	\$650.00	0.2000	\$130.00								
12/4/2019	SW	Analyze: Continued review and analysis of case history in support of deposition preparation.	\$650.00	0.2000	\$130.00								
12/4/2019	SW	Conference call with Attorney Healey regarding deposition strategy.	\$650.00	0.2000	\$130.00								
12/3/2019	SW	Analyze: Review and analyze case pleadings and case background materials in support of deposition preparation.	\$650.00	2.1000	\$1,365.00	0.5	325						
11/26/2019	SW	Analyze: Review and analyze case background materials in support of discovery assistance.	\$650.00	0.6000	\$390.00								
Total Lodestar				346.20	\$225,030.00							\$5,850	
						31.1	\$20,215	15.3	\$10,725	1.7	\$1,105	9	50.00%

Fees

Date	Timekeeper	Task Description	Hourly Rate	Hours Worked	Fee (Hourly Rate x Hours Worked)	<u>Lodestar Reductions</u>								
						General Hrs	Fees	CC Confs Hrs	Fees	Falkenberg Hrs	Fees	Travel Hrs	Fees	
Lodestar Reductions						Perct	100%	100%	30.00%	30.00%	100.00%	100.00%	50.00%	\$2,925
						Subt	31.1	\$20,215	4.59	\$3,218	1.7	\$1,105	4.5	
						<u>Summary</u>	Hours	Dollars						
						General	31.1	\$20,215						
						CC Confs	4.59	\$3,218						
						Falkenberg	1.7	\$1,105						
						Travel	4.5	\$2,925						
						Total	41.89	\$27,463						
Net Lodestar														\$197,567.50

Costs

<u>Category</u>	<u>Amount</u>
Travel (Meal)	25.78
PACER	24.5
Total	50.28

THAMER

Michael D. Thamer - Lodestar Fees/Costs

Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>		<u>Lodestar Reductions</u>					
				<u>Worked</u>		<u>General</u>	<u>Fees</u>	<u>CC Confs</u>	<u>Falkenberg</u>	<u>Travel</u>	<u>Fees</u>		
						Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
5/26/2017	Michael Thamer	Review emails from co-counsel re issues with potential class rep's legal status as class reps and send email to CANHR re same.	\$895.00	0.3			268.50						
6/10/2017	Michael Thamer	TC with Co-counsel re case approach and team.	\$895.00	0.5			447.50						
6/14/2017	Michael Thamer	Review email re case status and plaintiff team and send email to co-counsel re on board.	\$895.00	0.3			268.50						
7/17/2017	Michael Thamer	Review emails re meeting with rep of defendants and send email to co-counsel re my availability.	\$895.00	0.3			268.50						
9/21/2017	Michael Thamer	Review correspondence from co-counsel re Gibson Dunn intent to move for removal and facts re how staffing performed, etc. and respond to same.	\$895.00	0.3			268.50						
10/17/2017	Michael Thamer	Review email re setting up a meeting with defense counsel re why we have no case, etc. and send email to co-counsel re my availability for a meeting.	\$895.00	0.2			179.00						
10/17/2017	Michael Thamer	Review old interviews with ex-Sunrise employees re staffing practices and send email to co-counsel re same.	\$895.00	0.8			716.00						
10/30/2017	Michael Thamer	Review materials sent from Stebner's office re Sunrise's practices and staffing to prep for upcoming meeting with defense counsel.	\$895.00	0.5			447.50						
10/30/2017	Michael Thamer	Internet research re Sunrise in CA.	\$895.00	0.5			447.50						
11/1/2017	Michael Thamer	Travel to SF from Callahan office (6 hrs).	\$895.00	6			5,370.00					6	5,370
11/1/2017	Michael Thamer	Meet with co-counsel to prepare for meeting.	\$895.00	1			895.00						
11/1/2017	Michael Thamer	Meet with defense counsel re Sunrise's staffing policies, etc, documents used, etc.	\$895.00	1.5			1,342.50						
11/1/2017	Michael Thamer	Post-meet with co-counsel re meeting.	\$895.00	0.3			268.50						
11/2/2017	Michael Thamer	Return travel from SF meeting to Callahan office.	\$895.00	6			5,370.00					6	5,370.00
11/2/2017	Michael Thamer	Review 15 docs sent to me by co-counsel re Sunrise staffing policies and send memo to co-counsel re my analysis of same.	\$895.00	1.2			1,074.00						
11/10/2017	Michael Thamer	Review email from KK re doc request and setting follow-up meeting and respond to same.	\$895.00	0.3			268.50						
11/16/2017	Michael Thamer	Review long email from CH re TC with JS and Sunrise's reaction to our questions and a draft letter back to JS with Plaintiff's position and send email to co-counsel re my thoughts re same.	\$895.00	0.3			268.50						
12/5/2017	Michael Thamer	Emails to co-counsel re follow-up meeting with Sunrise and review emails re same.	\$895.00	0.2			179.00						
12/6/2017	Michael Thamer	Send thoughts to CH re Sunrise canceling our follow-up meeting and likely reasons why.	\$895.00	0.3			268.50						
12/6/2017	Michael Thamer	Review emails re same/response.	\$895.00	0.2			179.00						
12/6/2017	Michael Thamer	TC with CH.	\$895.00	0.2			179.00						
12/13/2017	Michael Thamer	Conference call with Co-counsel re Sunrise matter, issues, assignments, to do matters, etc.	\$895.00	1.2			1,074.00			1.2	1,074.00		
12/13/2017	Michael Thamer	Review follow up emails re same and respond.	\$895.00	0.1			89.50						
12/14/2017	Michael Thamer	TC with CH re status and to do items.	\$895.00	0.2			179.00						
1/18/2018	Michael Thamer	TC with co-counsel re case status, expected pleading challenges, and potential approaches re complaint amendments, etc.	\$895.00	0.3			268.50			0.3	268.5		

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
2/24/2018	Michael Thamer	Emails to and from KS re PMK depo of Sunrise re staffing and timing, etc.	\$895.00	0.3	268.50								
3/1/2018	Michael Thamer	TC with Co-counsel re case status, to do items and investigation re staffing.	\$895.00	0.1	89.50			0.1	89.50				
3/1/2018	Michael Thamer	Review downloaded files sent from Stebner's office.	\$895.00	0.5	447.50								
3/1/2018	Michael Thamer	Email to KK.	\$895.00	0.2	179.00								
3/5/2018	Michael Thamer	Review Sunrise materials from individual cases9CCL file).	\$895.00	0.5	447.50								
3/5/2018	Michael Thamer	Prepare comprehensive questions for deposition for attorney with a staffing PMK depo coming up to assist help determine the staffing formula used by Sunrise and the relationship it has, if any, with resident assessments.	\$895.00	0.8	716.00								
3/8/2018	Michael Thamer	Review materials for 3 rd party re resident assessments, CCL records, Plan of Operation and other materials re TC with CH re Yelp reviews, etc.	\$895.00	1	895.00								
3/9/2018	Michael Thamer	Review additional materials re resident assessments, Sunrise point and care level system, CCL records, etc.	\$895.00	1	895.00								
3/9/2018	Michael Thamer	TC with KS and others re Sunrise staffing formulas, resident assessments, Care levels and possible relationships between them.	\$895.00	0.5	447.50								
3/13/2018	Michael Thamer	Review case outlining relationship between Sunrise and REITs and send email to CH re same.	\$895.00	0.2	179.00								
3/23/2018	Michael Thamer	R&R Email from atty WY re Sunrise depo and testimony re staffing and reply to same.	\$895.00	0.3	268.50								
4/3/2018	Michael Thamer	Respond to multiple emails re questions on how staffing is determined at Sunrise facilities.	\$895.00	0.3	268.50								
4/3/2018	Michael Thamer	Review earlier proposed questions and forward to co-counsel.	\$895.00	0.2	179.00								
4/5/2018	Michael Thamer	TC with Co-counsel re case strategy and assignments, etc.	\$895.00	0.3	268.50			0.3	268.5				
8/20/2018	Michael Thamer	TC with CH and KS re participating in a mediation, adding one or more class reps, and issues with current class rep., timing of court's ruling, etc.	\$895.00	0.3	268.50								
9/11/2018	Michael Thamer	Review email from TN re ex-Sunrise employee and false reps, staffing, etc.	\$895.00	0.1	89.50								
9/11/2018	Michael Thamer	Numerous emails to and from co-counsel re same.	\$895.00	0.2	179.00								
11/30/2018	Michael Thamer	Review correspondence re status.	\$895.00	0.1	89.50								
11/30/2018	Michael Thamer	TC with CH and KS re meeting with Charlie Lee, Sunrise rep.	\$895.00	0.2	179.00								
12/5/2018	Michael Thamer	Review lengthy corresp. Re Sunrise staffing from CH and respond to same.	\$895.00	0.3	268.50								
12/6/2018	Michael Thamer	Drive from office in Callahan to SF for mtg with Sunrise counsel, Charlie Lee	\$895.00	6	5,370.00							6	5,370.00
12/6/2018	Michael Thamer	Meet with Charlie Lee, Sunrise defense counsel re issues, merits, and process for early resolution.	\$895.00	1.3	1,163.50								
12/7/2018	Michael Thamer	Travel back to Callahan office from SF meeting with Charlie Lee.	\$895.00	6	5,370.00							6	5,370.00
12/10/2018	Michael Thamer	Review CH draft letter to Sunrise rep C. Lee and reply with comments.	\$895.00	0.3	268.50								
12/14/2018	Michael Thamer	Review proposed list of issues and questions to raise in a conf. with ex-Sunrise employee and provide feedback.	\$895.00	0.3	268.50								
3/5/2019	Michael Thamer	Review Judge Statons' ruling on MTD and send email to co-counsel re contents of same.	\$895.00	0.2	179.00								
3/6/2019	Michael Thamer	Conference with CH re staffing records and doc requests.	\$895.00	0.3	268.50								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
		TC with co-counsel re to do items, assignments, key dates, discovery items, etc.	\$895.00	0.3	268.50								
3/7/2019	Michael Thamer								0.3	268.5			
3/12/2019	Michael Thamer	Respond to Corresp. re items for RFPs.	\$895.00	0.2	179.00								
3/14/2019	Michael Thamer	TC with co-counsel re discovery, investigation, assignments, etc.	\$895.00	0.3	268.50				0.3	268.5			
4/5/2019	Michael Thamer	T. Conf. with co-counsel re discovery, assignments, issues, investigations, etc.	\$895.00	0.3	268.50				0.3	268.5			
4/12/2019	Michael Thamer	Review note from TN re ex-Sunrise employee wrongful termination suit against Sunrise and communic. with plaintiff's attorney and respond with comments re same.	\$895.00	0.3	268.50								
4/17/2019	Michael Thamer	Review investigator report re ex-employee and contents of interview.	\$895.00	0.3	268.50								
4/18/2019	Michael Thamer	TC with co-counsel re mtn. to amend, court scheduling order, pleadings, deadlines, investigation, discovery and assignments.	\$895.00	0.3	268.50				0.3	268.5			
5/21/2019	Michael Thamer	Respond to CH re potential mediators.	\$895.00	0.3	268.50								
6/5/2019	Michael Thamer	TC with CH re discovery approach.	\$895.00	0.1	89.50								
6/5/2019	Michael Thamer	TC with co-counsel re discovery issues and needs, amendment of complaint, injunctive relief allegation, etc.	\$895.00	0.2	179.00				0.2	179.00			
6/14/2019	Michael Thamer	TC with co-counsel re recent meet and confer with defense counsel re discovery approach, arbitration issues, going forward, etc.	\$895.00	0.2	179.00				0.2	179			
6/14/2019	Michael Thamer	Review Schiferaw decision and discussion re declarations re target staffing, understaffing allegations, etc.	\$895.00	0.1	89.50								
6/14/2019	Michael Thamer	TC with CH re same.	\$895.00	0.1	89.50								
6/14/2019	Michael Thamer	Email to CH re items we need to pursue.	\$895.00	0.1	89.50								
6/20/2019	Michael Thamer	TC with CH and KS re case issues, assignments and staffing.	\$895.00	0.3	268.50								
7/25/2019	Michael Thamer	TC with co-counsel re motion to compel, to do list, assignments, DSS records request.	\$895.00	0.3	268.50				0.3	268.5			
7/25/2019	Michael Thamer	Review doc from CH and send note re type of doc and role in licensing and operations.	\$895.00	0.1	89.50								
7/25/2019	Michael Thamer	Respond re what we should request from DSS.	\$895.00	0.1	89.50								
7/29/2019	Michael Thamer	Review email re RC's conversation with defense counsel re Sunrise's DSS files.	\$895.00	0.2	179.00								
7/29/2019	Michael Thamer	Respond with comments re public records and discoverability.	\$895.00	0.1	89.50								
9/12/2019	Michael Thamer	TC with co-counsel re defendants' terms for protective order and our response., etc.	\$895.00	0.3	268.50				0.3	268.5			
10/1/2019	Michael Thamer	Review memo re data, experts and Sunrise's position re disclosing ID of same for access to data, etc. and respond to same.	\$895.00	0.3	268.50								
11/15/2019	Michael Thamer	TC with co-counsel re status of case, discovery issues, timing, motion to compel, class cert motion timing, pending motion to compel, assignments, etc.	\$895.00	0.5	447.50				0.5	447.5			
11/27/2019	Michael Thamer	Review CH memo re depo outline.	\$895.00	0.3	268.50								
12/2/2019	Michael Thamer	TC with CH re case status and to do items.	\$895.00	0.3	268.50								
12/3/2019	Michael Thamer	TC with co-counsel re discovery issues, depositions, scheduling, assignments, timing re motions etc.	\$895.00	0.3	268.50				0.3	268.5			
12/4/2019	Michael Thamer	Review email re depositions, scheduling etc.	\$895.00	0.1	89.50								
12/4/2019	Michael Thamer	Begin depo prep for 2 Administrator depositions.	\$895.00	0.9	805.50								
12/4/2019	Michael Thamer	Review summaries and cursory review of docs produced by Defendants to date.	\$895.00	0.3	268.50								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
12/4/2019	Michael Thamer	R&R various email re discovery.	\$895.00	0.2	179.00								
12/5/2019	Michael Thamer	Review and respond to CH re depo schedule.	\$895.00	0.3	268.50								
12/6/2019	Michael Thamer	Review summaries of documents produced to date.	\$895.00	1	895.00								
12/6/2019	Michael Thamer	Begin document review of writings produced by defendant to help with depo prep.	\$895.00	2	1,790.00								
12/6/2019	Michael Thamer	Send emails to co-counsel re certain docs.	\$895.00	0.5	447.50								
12/10/2019	Michael Thamer	Review documents produced in discovery for depo prep;	\$895.00	1	895.00								
12/10/2019	Michael Thamer	TC with SW re upcoming depositions and assignments and to do items;	\$895.00	0.8	716.00								
12/10/2019	Michael Thamer	TC with co-counsel re upcoming depositions and preparation for same;	\$895.00	1	895.00			1	895.00				
12/10/2019	Michael Thamer	Review email with various documents and summaries for use in depo prep.	\$895.00	0.2	179.00								
12/10/2019	Michael Thamer	TC with CH.	\$895.00	0.2	179.00								
12/10/2019	Michael Thamer	Send note to Co-counsel re expert CF.	\$895.00	0.2	179.00								
12/17/2019	Michael Thamer	TC with CH re depo objectives from class standpoint.	\$895.00	0.3	268.50								
12/24/2019	Michael Thamer	Review CH notes re Document production and respond; email to SW re TC, etc.	\$895.00	0.3	268.50								
12/26/2019	Michael Thamer	Begin review and create summary notes of CR E. Zach's resident file for depo prep.	\$895.00	2.2	1,969.00								
12/26/2019	Michael Thamer	Review CH's notes re depo outline ideas.	\$895.00	0.3	268.50								
12/27/2019	Michael Thamer	TC with SW re doc review and depo prep.	\$895.00	0.6	537.00								
12/27/2019	Michael Thamer	Complete review of CR E. Zack's resident file obtained through discovery.	\$895.00	1	895.00								
12/27/2019	Michael Thamer	Review CR E. Zack's file obtained through subpoena for any additions or changes.	\$895.00	1	895.00								
12/27/2019	Michael Thamer	Review CR H. Ganz's Resident file (400 plus pages) and make summary notes.	\$895.00	1.3	1,163.50								
12/27/2019	Michael Thamer	Prepare and send email to co-counsel re issues I found during review of both CR's resident files.	\$895.00	0.3	268.50								
12/29/2019	Michael Thamer	Continue to review numerous writings for depo prep and possible depo exhibits.	\$895.00	0.5	447.50								
12/29/2019	Michael Thamer	Continue review of resident files for both Edith Zach and Helen Ganz.	\$895.00	0.5	447.50								
12/29/2019	Michael Thamer	Emails to and from co-counsel re resident files, assessments, ISPs, etc.	\$895.00	0.8	716.00								
12/30/2019	Michael Thamer	TC with co-counsel re depo prep and document productions.	\$895.00	1	895.00			1	895.00				
12/30/2019	Michael Thamer	Continue to review potential depo exhibits for ED depo.	\$895.00	2.2	1,969.00								
12/31/2019	Michael Thamer	Review numerous docs for depo prep, including docs re staffing, ops, advertisements, resident contracts, etc.	\$895.00	5.5	4,922.50								
12/31/2019	Michael Thamer	Numerous emails re records to and from co-counsel.	\$895.00	1	895.00								
1/1/2020	Michael Thamer	Continue review of docs for depo prep.	\$895.00	3.7	3,311.50								
1/1/2020	Michael Thamer	Email to co-counsel re findings and issues.	\$895.00	1	895.00								
1/2/2020	Michael Thamer	Continue to review numerous documents to determine potential exhibits for deposition and make notes/organize same.	\$895.00	6.7	5,996.50								
1/4/2020	Michael Thamer	Continue to review documents for depo prep.	\$895.00	5	4,475.00								
1/4/2020	Michael Thamer	Review depo outline and potential questions.	\$895.00	1	895.00								
1/4/2020	Michael Thamer	TC with CH.	\$895.00	0.8	716.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/4/2020	Michael Thamer	Numerous emails with SW and CH re documents and potential exhibits.	\$895.00	1.7	1,521.50								
1/5/2020	Michael Thamer	Continue to review documents for depo exhibits.	\$895.00	1.3	1,163.50								
1/5/2020	Michael Thamer	Prepare depo outline, include questions re various exhibits	\$895.00	6	5,370.00								
1/5/2020	Michael Thamer	R&R emails re depo and exhibits.	\$895.00	1	895.00								
1/6/2020	Michael Thamer	Review documents and place writings in Ex. order and complete deposition outline for depo of ED of Sunrise of San Mateo	\$895.00	3	2,685.00								
1/6/2020	Michael Thamer	Travel from Callahan office to Sac.	\$895.00	6	5,370.00							6	5,370.00
1/6/2020	Michael Thamer	Fly from Sac. To OC for deposition.	\$895.00	3	2,685.00							3	2,685.00
1/7/2020	Michael Thamer	Finish review of depo exhibits and outline.	\$895.00	1.8	1,611.00								
1/7/2020	Michael Thamer	Meet with CH and SW re additional documents produced the night before and review.	\$895.00	1	895.00								
1/7/2020	Michael Thamer	Travel to depo and back.	\$895.00	1	895.00							1	895.00
1/7/2020	Michael Thamer	Take the depo of Villanueva, ED of Sunrise San Mateo.	\$895.00	8	7,160.00								
1/8/2020	Michael Thamer	Travel back to Callahan office from OC (flight from OC to Sac., then drive from Sac. To Callahan).	\$895.00	7.8	6,981.00							7.8	6,981.00
1/8/2020	Michael Thamer	TC with CH re issues to cover in next ED depo, etc.	\$895.00	0.2	179.00								
1/9/2020	Michael Thamer	Send email to CH re various documents and discovery and R&R email re discovery.	\$895.00	0.3	268.50								
1/10/2020	Michael Thamer	R&R numerous email from co-counsel and respond to same re depo results and data and doc issues.	\$895.00	0.3	268.50								
1/11/2020	Michael Thamer	TC with CH re expert costs/allocations.	\$895.00	0.3	268.50								
1/21/2020	Michael Thamer	Quick review of transcripts of depos of 2 Sunrise witnesses.	\$895.00	0.2	179.00								
1/21/2020	Michael Thamer	Corresp. with staff re organizing same for review.	\$895.00	0.1	89.50								
1/22/2020	Michael Thamer	Review email from CH re depositions.	\$895.00	0.1	89.50								
1/22/2020	Michael Thamer	TC with CH re depositions.	\$895.00	0.2	179.00								
2/3/2020	Michael Thamer	Review corresp. re REIT and Sunrise relationship and respond re obtaining evid. of same.	\$895.00	0.3	268.50								
2/4/2020	Michael Thamer	Begin depo summary of J. Villanueva.; TC with SW re RL.	\$895.00	1	895.00								
2/12/2020	Michael Thamer	Work on page/line depo summary of JV.	\$895.00	3	2,685.00								
2/13/2020	Michael Thamer	Work on page/line depo summary of JV.	\$895.00	2.5	2,237.50								
2/15/2020	Michael Thamer	Work on page/line depo summary of JV.	\$895.00	3	2,685.00								
2/16/2020	Michael Thamer	Work on page/line depo summary of JV.	\$895.00	5	4,475.00								
2/17/2020	Michael Thamer	Complete depo summary of JV and send to co-counsel with note.	\$895.00	1.8	1,611.00								
4/19/2020	Michael Thamer	Review email from CH re Sunrise staffing and respond to same.	\$895.00	0.3	268.50								
4/14/2020	Michael Thamer	Review a number of documents, depo summaries and exhibits and make notes re same re staffing model used by Sunrise.	\$895.00	1	895.00								
4/14/2020	Michael Thamer	TC with Co-counsel CH, GW and DM re flaws in Sunrise's model and associated risks, common issues, etc.	\$895.00	1	895.00			1	895.00				
4/17/2020	Michael Thamer	Review documents sent by CH.	\$895.00	0.5	447.50								
4/17/2020	Michael Thamer	Review memos and emails re Sunrise docs and issues.	\$895.00	0.5	447.50								
4/17/2020	Michael Thamer	T/ Conf. with GW, CH and DM re class cert issues, flaws in Sunrise assessment system, common issues and proof, etc.	\$895.00	1	895.00								
4/18/2020	Michael Thamer	Prep. corresp. to CH re material I need to provide further analysis re Sunrise staffing flaws.	\$895.00	0.3	268.50								
4/19/2020	Michael Thamer	TC with CH re Sunrise assessment system, to do issues, documents to review and upcoming staffing depo, etc.	\$895.00	0.5	447.50								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
4/22/2020	Michael Thamer	Send email to CH re defs' limits re task time studies and how to handle same.	\$895.00	0.3	268.50								
4/29/2020	Michael Thamer	Review Sunrise docs and Emails to CH re ideas for questions of 30B6 witness re time studies, targeted hours, etc.	\$895.00	0.5	447.50								
4/30/2020	Michael Thamer	Review CH summary of Slichta testimony and respond with comments.	\$895.00	0.3	268.50								
5/5/2020	Michael Thamer	Review sample assessments and ISPs re consistency and issues related to class cert motion.	\$895.00	0.8	716.00								
5/5/2020	Michael Thamer	R&R emails re same.	\$895.00	0.7	626.50								
5/6/2020	Michael Thamer	Review and summarize hundreds of pages of Sunrise University Operations Manual for Executive Directors.	\$895.00	2.5	2,237.50								
5/7/2020	Michael Thamer	Complete partial review of Sunrise University Operations Manual for Executive Directors	\$895.00	1.5	1,342.50								
5/7/2020	Michael Thamer	Prepare memo re excerpts from Sunrise's Ops manual relevant to class cert and merits.	\$895.00	1	895.00								
5/7/2020	Michael Thamer	Review assessments.	\$895.00	0.5	447.50								
5/11/2020	Michael Thamer	Review sample assessments from 5 facilities in different versions of SEHA assessment forms at different facilities and send CH email re my observations of same for purposes of class cert motion.	\$895.00	1.8	1,611.00								
5/12/2020	Michael Thamer	TC with CH Sunrise staffing model.	\$895.00	0.3	268.50								
5/18/2020	Michael Thamer	Review draft class cert. motion and send comment to CH.	\$895.00	0.5	447.50								
6/15/2020	Michael Thamer	TC with co-counsel re deposition scheduling, data production, discovery issues, motion issues, assignments, etc.	\$895.00	0.3	268.50			0.3	268.5				
6/24/2020	Michael Thamer	TC with team re Flores testimony and upcoming issues, data and requests for assessment and service plans, discovery issues, expert depositions coming up, etc.	\$895.00	1.5	1,342.50			1.5	1,342.50				
7/10/2020	Michael Thamer	TC with CH re expert deposition.	\$895.00	0.3	268.50								
7/12/2020	Michael Thamer	TC with CH re discovery ref. candidates.	\$895.00	0.1	89.50								
7/12/2020	Michael Thamer	TC with attorney TS re same.	\$895.00	0.2	179.00								
7/17/2020	Michael Thamer	R&R email from CH re mediation and case status for planning/scheduling.	\$895.00	0.3	268.50								
7/23/2020	Michael Thamer	Review corresp. re Sunrise objecting to produce certain resident data on privacy grounds.	\$895.00	0.1	89.50								
7/23/2020	Michael Thamer	Respond to same re applic. case law re issue.	\$895.00	0.2	179.00								
8/5/2020	Michael Thamer	T. Conf with co-counsel re case issues, arguments and plans to handle.	\$895.00	0.3	268.50			0.3	268.50				
8/5/2020	Michael Thamer	Email memo to CH re addit. thoughts re same.	\$895.00	0.2	179.00								
9/4/2020	Michael Thamer	Review declarations in oppos to class cert motion re staffing, citations, deficiencies; review DSS policies re same.	\$895.00	1.4	1,253.00								
9/4/2020	Michael Thamer	Review articles re staffing and poor outcomes in assisted living settings; Emails with co-counsel.	\$895.00	1	895.00								
9/4/2020	Michael Thamer	Tel. Conference with co-counsel re facts and issues relevant to the reply to the oppo to class cert, discovery needed for the reply, timing, assignments, etc.	\$895.00	0.8	716.00			0.8	716.00				
9/5/2020	Michael Thamer	Review email from CH re Sunrise staffing model, review docs. and reply to same.	\$895.00	0.5	447.50								
9/11/2020	Michael Thamer	TC with CH re expert wit. Flores and analysis and defense expert analysis.	\$895.00	0.3	268.50								

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Fees</u>	<u>Lodestar Reductions</u>		CC Confs	Falkenberg	Travel
				<u>Worked</u>			General	Fees			
9/27/2020	Michael Thamer	Review and reply to email from TN re upcoming depo of ex-DSS employee.	\$895.00	0.3		268.50					
9/30/2020	Michael Thamer	Email to and from DM re Watermark time estimates.	\$895.00	0.3		268.50					
10/10/2020	Michael Thamer	Review email from CH re ED turnover and reply re how to obtain without notice to defendants thru public records.	\$895.00	0.3		268.50					
10/12/2020	Michael Thamer	Review data re ED tenures and send email to c-counsel re how to determine dates, turnover, etc.	\$895.00	0.3		268.50					
10/14/2020	Michael Thamer	Review a number of emails re upcoming Musoke deposition and reply to MY re a depo issue.	\$895.00	0.3		268.50					
10/23/2020	Michael Thamer	Review DM summary of Crandall depo and send DM email re same.	\$895.00	0.3		268.50					
11/7/2020	Michael Thamer	Review CH memo of Malone depo and respond.	\$895.00	0.3		268.50					
12/3/2020	Michael Thamer	TC with Rose Lochman and SW	\$895.00	0.6		537.00					
12/3/2020	Michael Thamer	TC with CH and co-counsel re mediation prep and issues.	\$895.00	0.2		179.00					
12/5/2020	Michael Thamer	TC with CH re mediation, trial issues and investigation.	\$895.00	0.3		268.50					
12/5/2020	Michael Thamer	Send email to KS re need to jumpstart investigation to gather addit. trial evidence.	\$895.00	0.2		179.00					
12/6/2020	Michael Thamer	TC with CH re need for focused investigation effort, ideas, organization, staffing, etc.	\$895.00	0.5		447.50					
12/7/2020	Michael Thamer	TC with TN re investigation effort and planning.	\$895.00	0.4		358.00					
12/7/2020	Michael Thamer	TC with KE re investigation and organization; emails re So Cal investigator.	\$895.00	0.3		268.50					
12/7/2020	Michael Thamer	TC with KS re investigation effort.	\$895.00	0.3		268.50					
12/9/2020	Michael Thamer	Prepare for and attend mediation with Rob Kaplan.	\$895.00	9.3		8,323.50					
12/10/2020	Michael Thamer	Emails to co-counsel re case status following mediation.	\$895.00	0.3		268.50					
12/11/2020	Michael Thamer	Review materials sent by CH re relevant investigation information.	\$895.00	0.2		179.00					
12/11/2020	Michael Thamer	TC with investigator CS.	\$895.00	0.2		179.00					
12/11/2020	Michael Thamer	TC with Janssen firm re investigation into ex-employees, avenues, data available, etc.	\$895.00	0.4		358.00					
12/11/2020	Michael Thamer	Emails to KS and BU re investigation; email to investigator CS.	\$895.00	0.2		179.00					
12/15/2020	Michael Thamer	R&R email from co-counsel WS re investigation scope, assignments, to do lists, etc. and reply to same.	\$895.00	0.3		268.50					
12/15/2020	Michael Thamer	TC with CH re potential trial, trial team	\$895.00	0.2		179.00					
12/16/2020	Michael Thamer	Email to CH re injunction in Sunrise.	\$895.00	0.1		89.50					
12/16/2020	Michael Thamer	Review injunctions.	\$895.00	0.3		268.50					
12/16/2020	Michael Thamer	Email injunction to Mediator RK with note.	\$895.00	0.1		89.50					
12/16/2020	Michael Thamer	Emails to and from co-counsel re trial estimate and timing and team.	\$895.00	0.1		89.50					
12/17/2020	Michael Thamer	Review investigation memo from WS and reply re same.	\$895.00	0.1		89.50					
12/17/2020	Michael Thamer	TC with WS re investigation issues.	\$895.00	0.1		89.50					
12/28/2020	Michael Thamer	T. Conf. with co-counsel re investigation status and assignments.	\$895.00	0.5		447.50			0.5	447.5	
12/29/2020	Michael Thamer	Review email from co-counsel DM re task times and staffing and reply to same.	\$895.00	0.3		268.50					
1/8/2021	Michael Thamer	TC with CH re Sunrise witness SD.	\$895.00	0.5		447.50					
1/9/2021	Michael Thamer	Send email to co-counsel re conflict witness PS has due to consultant work she is performing and implications, etc.	\$895.00	0.3		268.50					

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
1/16/2021	Michael Thamer	R&R email from TN and WS and respond to same re obtaining Sunrise witness statements vrs. Inv. Summary and implications of same.	\$895.00	0.3	268.50								
1/19/2021	Michael Thamer	Review emails re witness investigation results and reply to same.	\$895.00	0.3	268.50								
1/22/2021	Michael Thamer	Review inv. Materials and email to WS re issues.	\$895.00	0.1	89.50								
1/22/2021	Michael Thamer	Send email to attys. L&M re Sunrise witnesses, etc.	\$895.00	0.1	89.50								
1/22/2021	Michael Thamer	Emails to investigator re witnesses.	\$895.00	0.1	89.50								
1/26/2021	Michael Thamer	Prepare for and interview witness SD	\$895.00	1.4	1,253.00								
1/26/2021	Michael Thamer	Email to co-counsel re TC.	\$895.00	0.3	268.50								
1/26/2021	Michael Thamer	Email to SD with contact info.	\$895.00	0.1	89.50								
1/28/2021	Michael Thamer	Zoom meeting with WS, KS and TN re status of the investigation, next steps, approaches, etc.	\$895.00	0.7	626.50								
1/28/2021	Michael Thamer	Prepare supplemental report of my interview with witness SD and circulate to co-counsel.	\$895.00	0.8	716.00								
1/29/2021	Michael Thamer	TC with CJH re class cert motion, etc.	\$895.00	0.2	179.00								
1/29/2021	Michael Thamer	Review memo re interview of ex-Sunrise witness from WS and reply. TC with CH re Sunrise data analysis issues, class status and related case issues.	\$895.00	0.3	268.50								
2/1/2021	Michael Thamer	Emails to and from WS re investigation.	\$895.00	0.2	179.00								
2/1/2021	Michael Thamer	Review emails re witnesses and personnel files and send email re strategy re same.	\$895.00	0.3	268.50								
2/2/2021	Michael Thamer	TC with CH re prep. for depo of witness Lacey.	\$895.00	0.5	447.50								
2/23/2021	Michael Thamer	Review emails re doc foundation at trial and reply with strategy re dealing with same.	\$895.00	0.3	268.50								
2/25/2021	Michael Thamer	Attend Lacey depo (via Zoom).	\$895.00	4.7	4,206.50								
2/26/2021	Michael Thamer	TC with SW re Trial Prep issues, court's civil trial order, and due dates and steps to take, etc.	\$895.00	1	895.00								
3/1/2021	Michael Thamer	Review email from CH re lacey depo and follow-up needed.	\$895.00	0.1	89.50								
3/1/2021	Michael Thamer	Conf. Call with co-counsel.	\$895.00	0.4	358.00			0.4	358.00				
3/3/2021	Michael Thamer	Send email to co-counsel re witness list and disclosures, etc.	\$895.00	0.3	268.50								
3/9/2021	Michael Thamer	TC with CH re witness issues and facts.	\$895.00	0.3	268.50								
3/10/2021	Michael Thamer	Review email from CH re case status and plan going forward; reply to same.	\$895.00	0.3	268.50								
4/20/2021	Michael Thamer	Review DM report re results of ProModel simulation re Sunrise staffing.	\$895.00	0.2	179.00								
4/20/2021	Michael Thamer	Send email to DM re same.	\$895.00	0.1	89.50								
5/3/2021	Michael Thamer	TC with team re staffing Analysis, assumptions, benefits of doubts, factual basis, etc. for evaluation of model, etc.	\$895.00	1.2	1,074.00			1.2	1,074.00				
5/3/2021	Michael Thamer	Review CA law re rest breaks during shift required by CA law.	\$895.00	0.5	447.50								
10/7/2021	Michael Thamer	R&R emails from DM and CH re contact with plaintiff consultant by defense consultant.	\$895.00	0.5	447.50								
10/7/2021	Michael Thamer	Tel. Conf with Team re dealing with same.	\$895.00	0.5	447.50			0.5	447.50				
10/7/2021	Michael Thamer	Send email to CH with thoughts re impact of same.	\$895.00	0.2	179.00								
10/8/2021	Michael Thamer	Review CH email re alleged viol. protective order.	\$895.00	0.1	89.50								
10/8/2021	Michael Thamer	Reply email re same.	\$895.00	0.1	89.50								
11/16/2021	Michael Thamer	Review email report re grant of class cert motion and denial of Daubert motions.	\$895.00	0.1	89.50								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General Hrs	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
11/16/2021	Michael Thamer	Reply email re same.	\$895.00	0.1	89.50								
11/16/2021	Michael Thamer	Review co-counsel emails re same.	\$895.00	0.1	89.50								
11/17/2021	Michael Thamer	TC with CH re preparing for trial and scope of elements and proof.	\$895.00	0.1	89.50								
11/17/2021	Michael Thamer	Review case materials, outlines, etc.MT Sunrise.	\$895.00	0.2	179.00								
12/3/2021	Michael Thamer	Review Defendants' Rule 23(f) petition and send comments re same to CH.	\$895.00	0.2	179.00								
12/12/2021	Michael Thamer	Review court's order certifying class; review Defendant's petition for interlocutory review.	\$895.00	0.5	447.50								
12/12/2021	Michael Thamer	Review Plaintiffs oppo to Defendant's petition.	\$895.00	0.5	447.50								
12/16/2021	Michael Thamer	Review CH's memo re trial issues and contentions of fact and law as well as conference to do list.	\$895.00	1.5	1,342.50								
12/16/2021	Michael Thamer	Participate in video conference with co-counsel discussing trial approaches, issues, assignments, and needs.	\$895.00	1	895.00				1	895.00			
12/17/2021	Michael Thamer	Send email to MY and WS re trial prep and witnesses.	\$895.00	0.2	179.00								
12/20/2021	Michael Thamer	Email to MY and WS re witnesses and conference	\$895.00	0.1	89.50								
12/20/2021	Michael Thamer	Review witness materials.	\$895.00	0.2	179.00								
12/20/2021	Michael Thamer	Email to CH re same	\$895.00	0.1	89.50								
12/20/2021	Michael Thamer	Email to KE, MY and WS re witnesses and assignments.	\$895.00	0.1	89.50								
1/7/2022	Michael Thamer	Review email from CH re discovery argument with ref. and reply to same.	\$895.00	0.3	268.50								
1/11/2022	Michael Thamer	Email from CH re class list and Belaire West group.	\$895.00	0.1	89.50								
1/11/2022	Michael Thamer	Email assignment to MY/KE re same.	\$895.00	0.2	179.00								
1/12/2022	Michael Thamer	Participate in Zoom conf. re Trial prep, approach, issues, assignments.	\$895.00	1.5	1,342.50								
3/3/2022	Michael Thamer	TC with CH re case status and issues re discovery.	\$895.00	0.3	268.50								
3/30/2022	Michael Thamer	Review and respond to emails.	\$895.00	0.1	89.50								
3/30/2022	Michael Thamer	Email to DM re RCC interview and results.	\$895.00	0.1	89.50								
3/30/2022	Michael Thamer	Review reply re same.	\$895.00	0.1	89.50								
4/1/2022	Michael Thamer	TC with CH re data issues, trial presentation and prep.	\$895.00	0.1	89.50								
4/1/2022	Michael Thamer	Review email re 9th Cir. Grant of review and issues at play and respond to same.	\$895.00	0.1	89.50								
12/20/2022	Michael Thamer	TC with CH re case status and issues.	\$895.00	0.3	268.50								
3/10/2023	Michael Thamer	TC with CH re issues re status and settlement issues.	\$895.00	0.3	268.50								
5/30/2023	Michael Thamer	Review appellate briefs and cited cases.	\$895.00	4.5	4,027.50								
5/30/2023	Michael Thamer	Participate in Zoom moot hearing prep.	\$895.00	1	895.00				1	895.00			
6/6/2023	Michael Thamer	Review appellate briefs and cited cases.	\$895.00	2	1,790.00								
6/6/2023	Michael Thamer	Participate in Zoom moot hearing prep.	\$895.00	1	895.00				1	895.00			
6/7/2023	Michael Thamer	TC with CH re preparation for hearing.	\$895.00	0.5	447.50								
6/20/2023	Michael Thamer	Review appellate briefs and cited cases.	\$895.00	2.7	2,416.50								
6/20/2023	Michael Thamer	Participate in Zoom moot hearing prep.	\$895.00	1	895.00				1	895.00			
7/3/2023	Michael Thamer	Review 9 th Cir. info and respond to CH.	\$895.00	0.3	268.50								
7/11/2023	Michael Thamer	View 9 th Cir. oral arg. and send comments to CH.	\$895.00	0.8	716.00								
7/12/2023	Michael Thamer	Send comment to CH re rebut of defense counsel arg. re need for individ. analysis.	\$895.00	0.3	268.50								
7/18/2023	Michael Thamer	Send email with comment re resp. to Rule 28(j) materials.	\$895.00	0.3	268.50								
7/31/2023	Michael Thamer	Review email re defense rep overture re settlement and manner of our response.	\$895.00	0.3	268.50								
8/2/2023	Michael Thamer	Review 9 th Cir. Order.	\$895.00	0.2	179.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel	
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees
8/2/2023	Michael Thamer	R&R email from CH re same.	\$895.00	0.1	89.50								
9/25/2023	Michael Thamer	Emails and TC with CH re trial prep. Meeting.	\$895.00	0.3	268.50								
9/28/2023	Michael Thamer	Review emails re mediation and trial prep.	\$895.00	0.1	89.50								
9/28/2023	Michael Thamer	Review bio of proposed mediator.	\$895.00	0.1	89.50								
10/2/2023	Michael Thamer	TC with CH re trial and strategy/approach at trial and prep. for upcoming meeting.	\$895.00	0.3	268.50								
10/2/2023	Michael Thamer	Review of related materials.	\$895.00	0.4	358.00								
11/2/2023	Michael Thamer	Review Slichta depo in prep for Trial Prep. Mtg.	\$895.00	1.8	1,611.00								
11/3/2023	Michael Thamer	T. Conf. with co-counsel re upcoming mediation, investigation, needs going forward, assignments, etc.	\$895.00	1.2	1,074.00								
11/3/2023	Michael Thamer	TC with CH.	\$895.00	0.1	89.50								
11/4/2023	Michael Thamer	Complete review of Slichta depo.	\$895.00	0.8	716.00								
11/11/2023	Michael Thamer	Review witn. Interviews for trial prep.	\$895.00	0.3	268.50								
11/13/2023	Michael Thamer	Send email to DM and CH re witness SD and interview notes, etc. Begin travel to Texas trial strategy and prep. meeting - Drive from Callahan office to Portland.	\$895.00	0.3	268.50								
12/4/2023	Michael Thamer	Travel to Texas trial strategy and prep meeting (Fly from PDX to Austin then drive from Austin to DM's p outside Fredericksburg)	\$895.00	6	5,370.00							6	5,370
12/5/2023	Michael Thamer	Attend trial prep. mtg. in Texas with CH, DM, BM, MY, and JT. Day 1; Discuss and develop trial strategy, witness issues, claims trial presentation, jury instructs., special verdict forms, Mediation Brief, Sunrise docs and data, etc., investigation and potential witness testimony.	\$895.00	9.5	8,502.50							9.5	8,502.50
12/6/2023	Michael Thamer	Attend trial prep. mtg. in Texas with CH, DM, BM, MY, and JT. Day 2; Discuss and develop trial strategy, witness issues, claims trial presentation, jury instructs., special verdict forms, Mediation Brief and Mediation issues, Sunrise docs and data, etc., investigation and potential witness testimony.	\$895.00	9	8,055.00								
12/7/2023	Michael Thamer	Return travel from Texas trial prep. meeting. Drive from outside Fredricksburg to Austin and fly to SLC then to PDX.	\$895.00	9	8,055.00								
12/8/2023	Michael Thamer	Complete travel from Texas mtg. – Drive from PDX to office in Callahan, CA.	\$895.00	10.8	9,666.00							10.75	9,621.75
12/9/2023	Michael Thamer	R&R numerous email.	\$895.00	6	5,370.00							6	5,370.00
12/20/2023	Michael Thamer		\$895.00	0.3	268.50								
12/20/2023	Michael Thamer	Review numerous witness statements and related correspondence.	\$895.00	0.5	447.50								
12/20/2023	Michael Thamer	Review Mediation Brief.	\$895.00	0.5	447.50								
12/20/2023	Michael Thamer	Review Defense experts and resumes and do research re same.	\$895.00	0.7	626.50								
12/20/2023	Michael Thamer	Emails to co-counsel and JAMS.	\$895.00	0.2	179.00								
12/20/2023	Michael Thamer	TC with CH.	\$895.00	0.3	268.50								
12/29/2023	Michael Thamer	Review Mediation brief and send email to CH re list of minor corrections suggested.	\$895.00	0.5	447.50								
12/30/2023	Michael Thamer	Review email re base services and respond to same.	\$895.00	0.3	268.50								
1/8/2024	Michael Thamer	Organize Mediation binder, review briefing.	\$895.00	0.2	179.00								
1/8/2024	Michael Thamer	Travel from Callahan office to Ashland, OR for proximity to early flight re mediation.	\$895.00	1.8	1,611.00							1.8	1,611.00
1/9/2024	Michael Thamer	Travel to Medford, OR; Flights to Philadelphia Mediation via SLC.	\$895.00	11	9,845.00							11	9,845.00
1/9/2024	Michael Thamer	Meet with Co-counsel to prep. for mediation.	\$895.00	2	1,790.00								

Date	Timekeeper	Task Description	Hourly Rate	Hours		Lodestar Reductions		CC Confs		Falkenberg		Travel			
				Worked	Fees	General	Fees	Hrs	Fees	Hrs	Fees	Hrs	Fees		
1/10/2024	Michael Thamer	Prepare for and participate in Mediation with Magistrate Welsh, ret.	\$895.00	8	7,160.00										
1/10/2024	Michael Thamer	Meet with Co-counsel re mediation prep.	\$895.00	2	1,790.00										
1/11/2024	Michael Thamer	Travel to Airport, Flights from Philadelphia to Medford via SLC, drive from Medford back to Callahan home office.	\$895.00	11	9,845.00							11	9,845.00		
1/11/2024	Michael Thamer	Review emails re mediation or settlement proposals, etc.	\$895.00	0.5	447.50										
1/12/2024	Michael Thamer	Review email from CH re mediator proposal, impacts, next steps, etc.	\$895.00	0.3	268.50										
1/16/2024	Michael Thamer	Review proposed injunction, various settlement aspects analysis, etc., and comments/emails re same.	\$895.00	0.5	447.50										
1/17/2024	Michael Thamer	Email to CH re timing of terms/settlement.	\$895.00	0.5	447.50										
1/17/2024	Michael Thamer	Conf call with team re settlement proposal, case status, timing, injunction, etc.	\$895.00	0.5	447.50			0.5	447.50						
1/19/2024	Michael Thamer	Review statement re class period position statement and respond re same.	\$895.00	0.3	268.50										
1/25/2024	Michael Thamer	Review update re Sunrise's position re proposed injunction terms and respond re barrier to them leaving state.	\$895.00	0.3	268.50										
Total Lodestar					336.80	\$ 301,436.00	-								
Lodestar Reductions						- \$48,728.53		0	\$0	18.4	\$16,468	0	0	97.85	\$87,576
						Perct	100%	100%	30.00%	30.00%	100.00%	100.00%	50.00%	50.00%	
						Subt	0	\$0	5.5	\$4,940	0	0	48.9	\$43,788	
						General	0	\$0							
						CC Confs	5.5	\$4,940							
						Falkenberg	0	0							
						Travel	48.9	\$43,788							
						Total	54.445	\$48,729							
Net Lodestar						\$301,436.00									

Costs

Date	Name	Expense Account	Amount
11/1/2017	Cardmember Services	Shell Oil - Fuel	\$ 75.00
11/1/2017	Cardmember Services	Clipper Service - Ferry	\$ 23.75
11/2/2017	Cardmember Services	Hotel Sausalito - Lodging	\$ 108.90
12/3/2018	Cardmember Services	Shell Oil - Fuel	\$ 65.53
12/3/2018	Cardmember Services	Shell Oil - Fuel	\$ 16.87
12/6/2018	Cardmember Services	Palace Hotel - Lodging	\$ 378.63
12/6/2018	Cardmember Services	Union 76 - Fuel	\$ 75.00
12/6/2018	Cardmember Services	Clipper Service - Ferry	\$ 12.50
12/7/2018	Cardmember Services	Shell Oil - Fuel	\$ 95.00
12/31/2019	Cardmember Services	Southwest - Airfare	\$ 435.76
1/6/2020	Cardmember Services	Chevron - Fuel	\$ 99.52
1/8/2020	Cardmember Services	Enterprise - Car rental	\$ 81.11
1/8/2020	Cardmember Services	Chevron - Fuel	\$ 74.87
1/8/2020	Cardmember Services	Sacramento Airport - Parking	\$ 58.00

<u>Date</u>	<u>Timekeeper</u>	<u>Task Description</u>	<u>Hourly Rate</u>	<u>Hours</u>		<u>Lodestar Reductions</u>		<u>CC Confs</u>		<u>Falkenberg</u>		<u>Travel</u>	
				<u>Worked</u>	<u>Fees</u>	<u>General</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>	<u>Hrs</u>	<u>Fees</u>
12/4/2023	USAA Visa	Chevron - Fuel	\$	70.66									
12/5/2023	American Express	Alaska Airlines - Airfare	\$	168.90									
12/8/2023	American Express	Alaska Airlines - Airfare	\$	198.20									
12/9/2023	USAA Visa	Loves #728 - Fuel	\$	61.60									
12/9/2023	USAA Visa	Yreka Prop - Fuel	\$	69.58									
1/9/2024	USAA Visa	Ritz Philadelphia - Hotel	\$	691.20									
1/9/2024	USAA Visa	Chevron - Fuel	\$	126.06									
1/9/2024	Cardmember Services	Ashland Springs - Fuel	\$	109.75									
1/9/2024	American Express	Delta - Airfare	\$	856.40									
1/11/2024	USAA Visa	Union 76 - Fuel	\$	59.64									
1/11/2024	USAA Visa	Ritz Philadelphia - Hotel	\$	518.77									
1/11/2024	American Express	Uber	\$	42.40									
1/11/2024	USAA Visa	Medford Airport - Parking	\$	45.00									
		Total	\$	4,618.60									

EXHIBIT 2

SUMMARY

Costs

<u>Firm</u>	<u>Costs</u>
Dentons	\$460,624.56
Schneider Wallace	\$548,381.15
Marks	\$581,313.05
Stebner	\$48,045.49
Janssen	\$66,213.69
Thamer	\$4,618.60
TOTAL	\$1,709,196.54

DENTONS

to s LL Costs

rt it ss Co s t ts

10 28 2019	tside ro essional Ser ices Ser ices b Mark achs MD M	\$	450.00
02 05 2020	tside ro essional Ser ices eimb rsement or Dentons share o e ert e enses Torre artners or e erts ser ices rendered thro h ebr ar 29, 2020 atrick	\$	32,524.50
03 13 2020	enned	\$	1,164.50
04 28 2020	tside ro essional Ser ices eimb rsement b Denton s or e ert e enses aid b M to roModel, Dr. ichard eldman, and Dr. Da id elson. Iso S ner en in oice.	\$	9,314.96
06 09 2020	Torre artners or e ert ser ices rendere thro h Ma 31, 2020 atrick enned	\$	3 ,944.00
06 18 2020	tside ro essional Ser ices eimb rsement b Denton s to Marks, alette, iessel and o n or e ert e enses aid b M in the e is , e is W , akmont and S nrise class actions	\$	10,260.00
08 19 2020	Torre artners or e ert ser ices rendered thro h J l 31, 2020 atrick enned	\$	13,333.50
08 24 2020	tside ro essional Ser ices eimb rsement b Dentons to Marks, alette, iessel and o n or e ert e enses aid b M in the e is , e is W , akmont and S nrise class actions	\$	10,86 .50
12 14 2020	Torre artners e ert ser ices rendered thro h o ember 30, 2020 atrick enned	\$	4 ,589.50
01 08 2021	ar s ttorne Ser ice n est. December 2020	\$	1,689.34
01 31 2021	ar s ttorne Ser ice n est Jan ar 2021	\$	1,663.95
02 02 2021	360 nc. tside ro essional Ser ices Ser ice ro ided in Jan ar 2021	\$	3,218. 5
04 28 2021	Torre artners e ert ser ices rendered thro h March 31, 2021 atrick enned	\$	4,286.50
06 18 2021	Stebner ssociates e ert ser ices a ment Share o ristina lores or e ert cons ltation	\$	8,500.00
6 30 2021	eimb rsemtnt b Dentons to Marks, alette, iessel and o n or e ert e enses aid b M ro Model	\$	60,000.00
08 18 2021	Torre artners e ert ser ices rendered thro h J l 31, 2021 atrick enned	\$	1,945.00
09 22 2021	eimb rsemtnt b Dentons to Marks, alette, iessel and o n or e ert e enses aid b M ro Model	\$	40,000.00
12 29 2021	Torre artners e ert ser ices rendered thro h December 31, 2022 atrick enned	\$	11,090.00
03 14 2023	Torre artners e ert ser ices rendered thro h ebr ar 28, 2023 atrick enned	\$	3,325.00

09 20 2023	Torre partners e ert ser ices rendered thro h st 31, 2023 atrick enned	\$	63 .50
	Sto t e ert ser ices rendered thro h ebr ar 2024 ro ect 2261094 atrick		
03 2 2024	enned	\$	2,295.00
04 26 2024	Sto t e ert ser ices rendered thro h ril 2024 atrick enned	\$	16,532.50
	tot rt it ss Co s t ts	\$	1 ,6 .00

ositio s

01 21 2020	tside ro essional Ser ices De osition Transcri to Jose h illan e a 1 20	\$	4,346.50
01 24 2020	tside ro essional Ser ices ideota e o De osition o Jose h illan e a on 1 20	\$	2,018.50
01 2 2020	tside ro essional Ser ices De osition Transcri to bbie olinario 1 10 20	\$	3,089.50
02 20 2020	tside ro essional Ser ices ideota e Ser ices bbie olinario 1 10 20	\$	2,144.00
05 12 2020	tside ro essional Ser ices De osition Transcri to Je Slichta 4 30 20	\$	2,629.25
05 12 2020	tside ro essional Ser ices ideota in o De osition o Je Slichta 4 30 20	\$	1,350.00
0 30 2020	tside ro essional Ser ices De osition o atrick enned 14 20	\$	2,012.40
08 19 2020	tside ro essional Ser ices De osition Transcri to ristina lores 24 20	\$	3,1 .00
09 28 2020	tside ro essional Ser ices De osition Transcri to esle reen ield 8 11 20	\$	1,19 .15
09 28 2020	tside ro essional Ser ices De osition Transcri to nda ahman 8 2 20	\$	1, 86.05
10 06 2020	tside ro essional Ser ices 10 20 De osition Transcri to e is Dale Schro er	\$	1, 94.20
10 06 2020	tside ro essional Ser ices ideota e e is Dale Schro er 10 20 De osition	\$	500.00
11 1 2020	tside ro essional Ser ices ideo o Jonathan Walker	\$	1,52 .63
11 23 2020	tside ro essional Ser ices De osition o Jonathan Walker, h.D. 10 30 20	\$	1,695.16
11 25 2020	tside ro essional Ser ices ideo o Tom err 11 1 20	\$	1, 99.88
11 30 2020	tside ro essional Ser ices De osition o Tom err 11 1 20	\$	3,245.04
03 24 2021	D ST T S T De osition Transcri to nn ace	\$	3,520.39
	tot ositio s	\$	7, .65

st L is

04 10 2018	W ST W M S ST S	\$	9 5.00
04 11 2018	W ST W M S ST S	\$	192.50

04 12 2018	W	ST	W	M	S		ST	S	\$	5.00
04 24 2018	W	ST	W	M	S		ST	S	\$	450.00
04 2 2018	W	ST	W				T	DJ	\$	5.00
04 30 2018	W	ST	W	M	S		ST	S	\$	942.50
05 23 2018	W	ST	W	M	S		ST	S	\$	1,060.00
11 01 2018	W	ST	W				M		\$	5.00
11 06 2018	W	ST	W				M		\$	5.00
01 23 2019	W	ST	W	T	S				\$	300.00
02 01 2019	W	ST	W		W		S		\$	300.00
02 05 2019	W	ST	W		W		S		\$	5.00
02 0 2019	W	ST	W		W		S		\$	225.00
02 08 2019	W	ST	W		W		S		\$	225.00
02 25 2019	W	ST	W		W		S		\$	5.00
02 2 2019	W	ST	W		W		S		\$	225.00
02 28 2019	W	ST	W		W		S		\$	1,206.00
03 01 2019	W	ST	W		W		S		\$	150.00
03 04 2019	W	ST	W		W		S		\$	165.00
03 25 2019	W	ST	W		W		S		\$	252.00
03 28 2019	e	is					M		\$	23.00
03 28 2019	e	is					M		\$	39.50
09 11 2019	W	ST	W		S		S		\$	5.00
09 20 2019	W	ST	W		S		S		\$	5.00
09 21 2019	W	ST	W		S		S		\$	5.00
09 22 2019	W	ST	W		S		S		\$	150.00
09 23 2019	W	ST	W		S		S		\$	1,002.00
09 24 2019	W	ST	W		S		S		\$	228.00
09 26 2019	e	is					M		\$.21
09 26 2019	e	is					M		\$	51.05
09 30 2019	W	ST	W		S		S		\$	1,092.00
10 18 2019	W	ST	W		S		S		\$	552.00
10 19 2019	W	ST	W		S		S		\$	59.00
10 21 2019	W	ST	W		S		S		\$	90.00
10 30 2019	W	ST	W		S		S		\$	80.00
10 31 2019	W	ST	W		S		S		\$	903.00
11 02 2019	W	ST	W		S		S		\$	150.00
11 06 2019	W	ST	W		S		S		\$	600.00

11 19 2019	W ST W			M	\$	5.00
11 19 2019	W ST W	S		S	\$	831.00
11 20 2019	W ST W			D	\$	129.06
11 20 2019	W ST W	S		S	\$	2,109.00
11 21 2019	W ST W	S		S	\$	1,020.00
12 03 2019	W ST W	S		S	\$	5.00
12 05 2019	W ST W	S		S	\$	102.00
01 13 2020	W ST W			M	\$	5.00
03 02 2020	W ST W			M	\$	136.00
03 16 2020	W ST W	SS			\$	5.00
03 18 2020	W ST W	SS			\$	258.00
03 19 2020	W ST W	SS			\$	516.00
04 0 2020	e is	SS			\$	49.50
04 0 2020	e is	SS			\$	53.00
05 12 2020	W ST W J M			TT	\$	225.00
05 29 2020	e is			M	\$	49.50
06 02 2020	W ST W			M	\$	5.00
0 10 2020	W ST W			M	\$	2,052.00
0 23 2020	e is			M	\$	26.50
0 23 2020	e is			M	\$	26.50
0 23 2020	e is			M	\$	26.50
0 23 2020	e is			M	\$	24 .50
0 23 2020	e is			M	\$	24 .50
0 23 2020	e is			M	\$	24 .50
08 06 2020	e is			M	\$	198.00
08 06 2020	e is			M	\$	198.00
08 06 2020	e is			M	\$	198.00
08 25 2020	e is			M	\$	26.50
08 25 2020	e is			M	\$	49.50
08 26 2020	e is			M	\$	148.50
09 25 2020	e is			M	\$	49.50
09 25 2020	W ST W			M	\$	122.00
09 28 2020	e is			M	\$	26.50
09 28 2020	e is			M	\$	26.50
09 28 2020	e is			M	\$	4 .50
09 28 2020	e is			M	\$	99.00

10 04 2020	W ST W	SS					\$	4.00
10 05 2020	W ST W	SS					\$	999.00
10 14 2020	e is		M				\$	99.00
10 14 2020	e is		M				\$	106.00
10 15 2020	W ST W			M			\$	664.00
10 26 2020	W ST W		S M				\$	286.00
10 2 2020	W ST W		S M				\$	516.00
11 23 2020	W ST W		T SS M				\$	225.00
11 23 2020	W ST W M		D M		M		\$	1,950.00
11 24 2020	W ST W		T SS M				\$	300.00
01 12 2021	W ST W	W	D T		M		\$	300.00
01 12 2021	W ST W	SS					\$	2,8 1.00
01 14 2021	W ST W	W	D T		M		\$	25 .50
01 21 2021	e is		M				\$	49.50
01 26 2021	W ST W	W	D T		M		\$	25 .50
01 2 2021	e is		M				\$	26.50
01 2 2021	e is		M				\$	49.50
02 1 2021	W ST W			M			\$	3.00
02 18 2021	e is		M				\$	49.50
02 19 2021	W ST W	SS					\$	405.00
02 22 2021	W ST W	SS					\$	148.00
02 23 2021	e is		M				\$	49.50
02 23 2021	W ST W	SS					\$	1, 06.50
02 24 2021	W ST W	SS					\$	1,345.50
02 26 2021	W ST W	SS					\$	953.00
03 18 2021	e is		M				\$	49.50
0 15 2021	W ST W	W	D T		M		\$	300.00
0 2 2021	W ST W	W	D T		M		\$	5.00
08 19 2021	W ST W	W	D T		M		\$	150.00
12 21 2021	W ST W	W	D T		M		\$	1,350.00
02 03 2022	e is		M				\$	3.50
02 03 2022	e is		M				\$	49.50
02 03 2022	e is		M				\$	112.00
0 25 2022	W ST W			M			\$	225.00
09 13 2022	W ST W	W	D T		M		\$	150.00
09 26 2022	W ST W	S	S W D				\$	5.00

12 22 2022	W ST W W D T M	\$	300.00
01 13 2023	W ST W W D T M	\$	150.00
0 03 2023	W ST W ST	\$	9 5.00
08 30 2023	W ST W M	\$	525.00
09 19 2023	W ST W M	\$	189.00
09 20 2023	W ST W M	\$	1,442.00
09 26 2023	W ST W M	\$	1,2 5.00
09 29 2023	W ST W M	\$	6 5.00
10 01 2023	W ST W M	\$	150.00
10 02 2023	W ST W M	\$	225.00
10 03 2023	W ST W M	\$	5.00
10 16 2023	W ST W M	\$	5.00
10 2 2023	W ST W M	\$	3 5.00
11 04 2023	W ST W M	\$	225.00
12 28 2023	W ST W W D T M	\$	150.00
04 10 2024	W ST W W D T M	\$	450.00

tot st L is \$ 47,94 .

M di tio F s

08 14 2020	tside ro essional Ser ices 12 9 20 Mediation	\$, 50.00
12 14 2023	tside ro essional Ser ices Mediation ees or Jan ar 10 11, 2024	\$	1 ,500.00

tot M di tio F s \$ 5, 50.00

Air r d t d

10 04 201	ir are hristo her J. eale ,Tra el to akland or settlement meetin	\$	16 .9
04 25 2018	ir are hristo her J. eale ,S nrise hearin .	\$	438.96
04 29 2018	ir are hristo her J. eale ,S nrise meetin	\$	485.96
05 11 2018	ir are hristo her J. eale , e is Mediation	\$	31.01
06 02 2018	ir are hristo her J. eale ,Team meetin in San rancisco	\$	242.98
11 2 2018	ir are hristo her J. eale ,S nrise meetin ith o osin co nsel	\$	405.96

03 11 2019	ir are hristo her J. eale , Meetin ith Wallace re lass erti ication ss es	\$	3.99
03 15 2019	ir are hristo her J. eale , ttend John ar entier de osition on 3 21 19	\$	32.06
03 15 2019	ir are hristo her J. eale , Meetin ith Wallace re lass erti ication ss es	\$	20.01
11 22 2021	ir are hristo her J. eale , Tra el to stin or trial re aration	\$	26.99
05 2 2023	ir are hristo her J. eale , Tra el to akland or hearin re aration meetin	\$	16 .96
06 19 2023	ir are hristo her J. eale , Tra el to akland to attend Moot o rt Session	\$	30.00
06 20 2023	ir are hristo her J. eale , Tra el to akland to attend Moot o rt Session	\$	1 0.00
09 05 2023	ir are hristo her J. eale , Tra el to stin, T to attend trial re aration meetin	\$	20.00
09 05 2023	ir are hristo her J. eale , Tra el to stin, T to attend trial re aration meetin	\$	20.00
09 05 2023	ir are hristo her J. eale , Tra el to stin, T to attend trial re aration meetin	\$	18 .95
11 05 2023	ir are hristo her J. eale , ttend Mediation in Jan ar 2024	\$	952.80
11 21 2023	ir are hristo her J. eale , Tra el to stin, T to attend trial re aration	\$	260.00
	tot Air r d t d \$,7 4.60

Lod i d r t d

06 0 2018	od in hristo her J. eale , Team meetin in San rancisco	\$	89.99
06 0 2018	od in Ta	\$	16.62
03 22 2019	od in Ta	\$	18.4
03 22 2019	od in hristo her J. eale , ttend John ar entier de osition on 3 21 19	\$	112.00
0 10 2023	od in Ta	\$	45.06
0 10 2023	od in hristo her J. eale , Tra el to asadena to attend ral r ment	\$	2 9.00
11 12 2023	od in Ta	\$	10 .00
11 12 2023	od in hristo her J. eale , ttend Mediation	\$	585.00
05 31 2024	od in Ta	\$	28.99
05 31 2024	od in hristo her J. eale , ttend reliminar ro al earin on 5 31 24	\$	1 9.00
	tot Lod i d t d \$		1,461.1

Attor r i s

	ilin ees TT		
		269049 T S T D T 4 8 19	
04 08 2019	J S J ST T	\$	86.80

09 2019	tside ro essional Ser ices Ser vice o mended S mmons and Second mended om laint	\$	1 5.00
01 09 2020	Deli er osta e TT , 30 891,1 09 20 D M SS S T , S ,D T 1813631 D S T D	\$	161.98
01 15 2020	Deli er osta e irst e al et ork Deli er o Doc ments to ibson D nn r tcher	\$	3 .33
01 23 2020	ilin ees TT ,311366,1 23 20 M S S M D T , S T SD 1819100S M T M M	\$	61.60
01 31 2020	ilin ees endor TT S TT , 311455, 1 31 20 D M SS S T , S ,D T 1823331	\$	103.95
01 26 2024	ilin ees TT 5 90 5 D M S S M D T	\$	104. 4
03 25 2024	ilin ees TT 591821 D M S S T D	\$	2.50
	tot Attor r i s \$		0 .90

Co rt Fi i F s

06 15 2018	ilin ees ilin ees ilin ees hristo herJ. eale , o o om laint nthon T nstall .S nrise Senior	\$	80.50
06 20 2019	i in Mana ement ran e o nt S erior o rt	\$.50
12 02 2019	ilin hristo herJ. eale , ro ac ice lication Da id Marks	\$	400.00
08 22 2024	ilin ees hristo herJ. eale ,Sh ts . on enant obbs rder ro in ard o ttorne ees	\$	3.00
08 22 2024	ilin ees hristo herJ. eale , alentine .Thekkek rder on Motion or ard o ttorne ees	\$	4.00
	tot Co rt Fi i F s \$		495.00

ro dTr s ort tio

10 15 201	ro ndTrans ortation hristo herJ. eale , arkin re li ht to client meetin	\$	43.35
11 01 201	ro ndTrans ortation hristo herJ. eale ,Ta i rom hotel to air ort	\$	6.00

	ro nd Trans ortation hristo her J. eale ,Ta i re tra el to meetin ith de ense		
11 01 201	co nsel	\$	23.65
12 04 201	ro nd Trans ortation hristo her J. eale ,Ta i to air ort or settlement meetin	\$	1 .85
12 06 201	ro nd Trans ortation hristo her J. eale , ber rom Del Mar to air ort	\$	33.20
12 06 201	ro nd Trans ortation hristo her J. eale , ber rom San ran to akland	\$.12
06 0 2018	ro nd Trans ortation hristo her J. eale , arkin at air ort	\$	20.00
12 06 2018	ro nd Trans ortation hristo her J. eale ,S nrise settlement meetin	\$	22.00
	ro nd Trans ortation hristo her J. eale ,Meetin ith Wallace re lass		
03 15 2019	erti cation ss es	\$	1.90
	ro nd Trans ortation hristo her J. eale , ttend John ar entier de osition on		
03 22 2019	3 21 19 and meetin ith Wallace	\$	15.00
	ro nd Trans ortation obert . occhia, ttended earin re lainti s Motion to		
10 10 2019	om el rther es onses to S ecial nterro atories	\$	3.00
	Milea e obert . occhia, ttended earin re lainti s Motion to om el rther		
10 10 2019	es onses to S ecial nterro atories	\$	64.96
	ro nd Trans ortation obert . occhia, ttended earin on Motion to om el		
01 23 2020	rther es onses to e est or rod ction o Doc ments	\$	3.00
	ro nd Trans ortation hristo her J. eale ,Tra el to akland to attend Moot o rt		
06 20 2023	Session	\$	35.90
	ro nd Trans ortation hristo her J. eale ,Tra el to akland to attend Moot o rt		
06 20 2023	Session	\$	36.99
	ro nd Trans ortation hristo her J. eale ,Tra el to akland to attend Moot o rt		
06 20 2023	Session	\$	44.83
	ro nd Trans ortation hristo her J. eale ,Tra el to asadena to attend ral r ment	\$	25.00
	ro nd Trans ortation hristo her J. eale ,Tra el to stin, T to attend S nrise Trial		
12 05 2023	re aration	\$	34.99
	ro nd Trans ortation hristo her J. eale ,Tra el to stin, T to attend S nrise Trial		
12 08 2023	re aration	\$	39.94
	ar ental hristo her J. eale ,Tra el to stin, T to attend S nrise Trial re aration	\$	419.69
12 21 2023	ro nd Trans ortation hristo her J. eale , ttended trial re aration meetin	\$	11.82
	ro nd Trans ortation hristo her J. eale , ttend Motion or reliminar ro al		
05 28 2024	earin	\$	20.00
	ro nd Trans ortation hristo her J. eale , ttend Motion or reliminar ro al		
05 29 2024	earin	\$	10.00

05 30 2024	ro nd Trans ortation hristo herJ. eale , ttend reliminar ro al earin on	\$	46.00
05 31 2024	ro nd Trans ortation hristo herJ. eale , ttend reliminar ro al earin on	\$	8.68
05 31 2024	ro nd Trans ortation hristo herJ. eale , ttend reliminar ro al earin on	\$	31.00
	tot ro dTr s ort tio	\$	1,165. 7

Liti tio ort Costs

01 30 2018	tside ro essional Ser ices 263 538 4201 D T 01 08 18	\$	2.10
06 29 2018	Transcri t earin Transcri t	\$	36.00
06 30 2018	tside ro essional Ser ices 263 538 22018 D T 0 06 2018	\$	8.10
0 31 2019	rocess Ser ices S b oena ser ed on Monterre ark	\$	34. 5
0 31 2019	rocess Ser ices S b oena ser ed on lSe ndo	\$	9 .25
0 31 2019	rocess Ser ices S b oena ser ed on resno	\$	9 .25
0 31 2019	rocess Ser ices S b oena ser ed on akland	\$	9 .25
0 31 2019	rocess Ser ices S b oena ser ed on ran e o nt	\$	9 .25
0 31 2019	rocess Ser ices S b oena ser ed on San Die o	\$	9 .25
0 31 2019	rocess Ser ices S b oena ser ed on San r no	\$	9 .25
0 31 2019	rocess Ser ices S b oena ser ed on Sacramento	\$	9 .25
0 31 2019	rocess Ser ices S b oena ser ed on San Jose	\$	9 .25
0 31 2019	rocess Ser ices S b oena ser ed on Woodland ills	\$	9 .25
0 31 2019	rocess Ser ices S b oena ser ed on i erside	\$	113. 5
0 31 2019	rocess Ser ices S b oena ser ed on ohnert ark	\$	125. 5
09 20 2019	tside ro essional Ser ices De osition icer ee i erside d Lt Senior are e ional ice	\$	0.50
09 20 2019	tside ro essional Ser ices De osition icer ee ohnert ark d Lt Senior are e ional ice	\$	0.50
09 20 2019	tside ro essional Ser ices De osition icer ee San Die o d Lt Senior are e ional ice	\$	0.50
09 20 2019	tside ro essional Ser ices De osition icer ee lSe ndo d Lt Senior are e ional ice	\$	0.50

09 20 2019	tside ro essional Ser ices De osition icer ee resno d Lt Senior are esidential ice	\$	0.50
09 20 2019	tside ro essional Ser ices De osition icer ee Montere ark d Lt Senior are esidential ice	\$	0.50
09 20 2019	tside ro essional Ser ices De osition icer ee akland d Lt Senior are esidential ice	\$	0.50
09 20 2019	tside ro essional Ser ices De osition icer ee ran e o nt d Lt Senior are esidential ice	\$	0.50
09 20 2019	tside ro essional Ser ices De osition icer ee Sacramento d Lt Senior are esidential ice	\$	0.50
09 20 2019	tside ro essional Ser ices De osition icer ee San r no d Lt Senior are esidential ice	\$	0.50
09 20 2019	tside ro essional Ser ices De osition icer ee San Jose d Lt Senior are esidential ice	\$	0.50
09 20 2019	tside ro essional Ser ices De osition icer ee Woodland ills d Lt Senior are esidential ice	\$	0.50
11 30 2019	tside ro essional Ser ices ri ac Mailin 11 22 19	\$	1,43 .00
02 12 2020	tside ro essional Ser ices 1 23 20 earin Transcri t o Motion earin re Motion to om el rther es onses to e est or rod ction o Doc ments	\$	302.22
02 12 2020	tside ro essional Ser ices 10 10 19 earin Transcri t	\$	346.02
03 13 2020	ario s De endant rod ction data sent to Da id Marks er hristo her eale .	\$	2 .46
0 03 2020	ther ice enses hristo her J. eale , rchase o sed ersion o "Mosb s Te tbook or on term are rsin ssistants" art o rod ction to De endants.	\$	26.2
11 01 2020	tside ro essional Ser ices Doc ment retrie al ser ices ctober 2020	\$	58.05
02 16 2021	tside ro essional Ser ices Transcri t o roceedin s 1 29 21	\$	12 .02
03 01 2021	ar s ttorne Ser ices n est ro essional ser ices 2 21 thro h 2 28 21	\$	504.30
03 31 2021	tside ro essional Ser ices ro essional ser ices 3 1 2021 3 31 2021	\$	640.00
04 05 2021	ooks, eriodicals S lements T searches March 2021	\$	130.00
08 2 2021	Transcri t 8 2 21 earin Transcri t o lainti s mended Motion or lass erti cation	\$	204.00
09 0 2021	tside ro essional Ser ices Transcri t o roceedin s 8 2 21	\$	5 .90
11 21 2021	Transcri t Transcri t o roceedin s rida , o mber 5, 2021	\$	40.80
0 15 2022	tside ro essional Ser ices e islati e histor	\$	2 5.00
06 20 2023	ther ice enses hristo her J. eale , Tra el to akland to attend Moot o rt Session	\$	3.00

ther ice enses hristo her J. eale ,Tra el to akland to attend Moot o rt

06 20 2023	Session	\$	3. 4
09 05 2024	Data ase esearch e ort rchased or . eale .	\$	600.00

tot Liti tio ort Costs \$ 6, 4.4

 r

04 08 2019	tside ro essional Ser ices	263 538 12019	S	\$	12. 0
0 16 2019	T T S T D S	263 538 22019	S	\$	184.30
10 0 2019	T T S T D S	263 538 32019	S	\$	33.30
01 06 2020	T T S T D S	263 538 12020	S	\$	105.10
01 0 2020	T T S T D S	263 538 42019	S	\$	49.90
04 05 2020	T T S T D S	263 538 22020	S	\$	103.40
0 02 2020	T T S T D S	263 538 32020	S	\$	2.40
0 02 2020	T T S T D S	263 538 32020	S	\$	2.40
0 14 2020	T T S T D S	263 538 32020	S	\$	14.90
0 16 2020	T T S T D S	263 538 32020	S	\$	2.00
0 28 2020	T T S T D S	263 538 32020	S	\$	2.60
0 29 2020	T T S T D S	263 538 32020	S	\$	2.60
0 31 2020	T T S T D S	263 538 32020	S	\$	6.10
08 1 2020	T T S T D S	263 538 32020	S	\$	2.10
08 20 2020	T T S T D S	263 538 32020	S	\$	2.60
08 21 2020	T T S T D S	263 538 32020	S	\$	2.60
08 25 2020	T T S T D S	263 538 32020	S	\$	60.60
09 02 2020	T T S T D S	263 538 32020	S	\$	3.00
09 04 2020	T T S T D S	263 538 32020	S	\$	3.00
09 08 2020	T T S T D S	263 538 32020	S	\$	5.20
09 15 2020	T T S T D S	263 538 32020	S	\$	3.00
09 16 2020	T T S T D S	263 538 32020	S	\$	3.10
09 1 2020	T T S T D S	263 538 32020	S	\$	3.00
09 22 2020	T T S T D S	263 538 32020	S	\$	3.00
10 01 2020	T T S T D S	263 538 42020	S	\$	1.20
10 08 2020	T T S T D S	263 538 42020	S	\$	2.80
10 19 2020	T T S T D S	263 538 42020	S	\$	3. 0

10 21 2020	T	T	S	T	D	S	263	538	42020	S	\$	3.00
10 21 2020	T	T	S	T	D	S	263	538	42020	S	\$	3.00
10 30 2020	T	T	S	T	D	S	263	538	42020	S	\$	2.40
11 04 2020	T	T	S	T	D	S	263	538	42020	S	\$	3.00
11 19 2020	T	T	S	T	D	S	263	538	42020	S	\$	2.40
12 03 2020	T	T	S	T	D	S	263	538	42020	S	\$	2.40
12 15 2020	T	T	S	T	D	S	263	538	42020	S	\$	2.40
01 04 2021	T	T	S	T	D	S	263	538	12021	S	\$	3.00
01 05 2021	T	T	S	T	D	S	263	538	12021	S	\$	2.50
01 12 2021	T	T	S	T	D	S	263	538	12021	S	\$	3.00
01 14 2021	T	T	S	T	D	S	263	538	12021	S	\$	3.00
01 19 2021	T	T	S	T	D	S	263	538	12021	S	\$	2.50
01 20 2021	T	T	S	T	D	S	263	538	12021	S	\$	3.00
01 21 2021	T	T	S	T	D	S	263	538	12021	S	\$	3.80
01 22 2021	T	T	S	T	D	S	263	538	12021	S	\$	3.60
02 01 2021	T	T	S	T	D	S	263	538	12021	S	\$	3.00
02 02 2021	T	T	S	T	D	S	263	538	12021	S	\$	2.50
02 04 2021	T	T	S	T	D	S	263	538	12021	S	\$	3.00
02 16 2021	T	T	S	T	D	S	263	538	12021	S	\$	3.00
02 1 2021	T	T	S	T	D	S	263	538	12021	S	\$	3.00
02 18 2021	T	T	S	T	D	S	263	538	12021	S	\$	2.50
02 18 2021	T	T	S	T	D	S	263	538	12021	S	\$	6.10
02 19 2021	T	T	S	T	D	S	263	538	12021	S	\$	3.00
03 01 2021	T	T	S	T	D	S	263	538	12021	S	\$	2.50
03 10 2021	T	T	S	T	D	S	263	538	12021D	S	\$	19.50
03 18 2021	T	T	S	T	D	S	263	538	12021D	S	\$	2.50
04 05 2021	T	T	S	T	D	S	263	538	22021	S	\$	3.00
04 06 2021	T	T	S	T	D	S	263	538	22021	S	\$	2.50
04 19 2021	T	T	S	T	D	S	263	538	22021	S	\$	13.30
04 22 2021	T	T	S	T	D	S	263	538	22021	S	\$	3.00
04 29 2021	T	T	S	T	D	S	263	538	22021	S	\$	3.00
05 03 2021	T	T	S	T	D	S	263	538	22021	S	\$	4.00
05 04 2021	T	T	S	T	D	S	263	538	22021	S	\$	2.50
05 1 2021	T	T	S	T	D	S	263	538	22021	S	\$	2.50
06 03 2021	T	T	S	T	D	S	263	538	22021	S	\$	2.50
06 16 2021	T	T	S	T	D	S	263	538	22021	S	\$	2.50

06 25 2021	T	T	S	T	D	S	263 538	22021	S	\$	3.00
0 01 2021	T	T	S	T	D	S	263 538 32021		S	\$	9.60
0 09 2021	T	T	S	T	D	S	263 538 32021		S	\$	0.90
0 14 2021	T	T	S	T	D	S	263 538 32021		S	\$	1.00
0 16 2021	T	T	S	T	D	S	263 538 32021		S	\$	0.50
0 19 2021	T	T	S	T	D	S	263 538 32021		S	\$	1.80
0 20 2021	T	T	S	T	D	S	263 538 32021		S	\$	1.90
0 28 2021	T	T	S	T	D	S	263 538 32021		S	\$	20.30
0 30 2021	T	T	S	T	D	S	263 538 32021		S	\$	8.20
08 09 2021	T	T	S	T	D	S	263 538 32021		S	\$	0.50
08 10 2021	T	T	S	T	D	S	263 538 32021		S	\$	15.90
08 11 2021	T	T	S	T	D	S	263 538 32021		S	\$	8.90
08 16 2021	T	T	S	T	D	S	263 538 32021		S	\$	0.10
08 1 2021	T	T	S	T	D	S	263 538 32021		S	\$	3.10
08 18 2021	T	T	S	T	D	S	263 538 32021		S	\$	8.90
08 19 2021	T	T	S	T	D	S	263 538 32021		S	\$	2.60
08 23 2021	T	T	S	T	D	S	263 538 32021		S	\$	0. 0
08 24 2021	T	T	S	T	D	S	263 538 32021		S	\$	10.00
08 25 2021	T	T	S	T	D	S	263 538 32021		S	\$	8.90
08 2 2021	T	T	S	T	D	S	263 538 32021		S	\$. 0
08 30 2021	T	T	S	T	D	S	263 538 32021		S	\$	1.10
09 01 2021	T	T	S	T	D	S	263 538 32021		S	\$	2.10
09 02 2021	T	T	S	T	D	S	263 538 32021		S	\$	0.90
09 1 2021	T	T	S	T	D	S	263 538 32021		S	\$	13.20
09 21 2021	T	T	S	T	D	S	263 538 32021		S	\$	4.80
09 22 2021	T	T	S	T	D	S	263 538 32021		S	\$	12.40
09 24 2021	T	T	S	T	D	S	263 538 32021		S	\$	10.30
09 2 2021	T	T	S	T	D	S	263 538 32021		S	\$	20.00
09 28 2021	T	T	S	T	D	S	263 538 32021		S	\$	9.10
12 31 2021	T	T	S	T	D	S	263 538 42021		S	\$	29 .40
03 31 2022	T	T	S	T	D	S	263 538 12022		S	\$	61.60
tot										r \$	1, 70.40

Co i s

03 01 2019	rint o ies W	\$	0.10
03 05 2019	rint o ies W	\$	0.10
03 19 2019	rint o ies W	\$	0.10
03 19 2019	rint o ies W	\$	0.10
03 19 2019	rint o ies W	\$	0.10
03 19 2019	rint o ies W	\$	0.10
03 19 2019	rint o ies W	\$	0.90
03 19 2019	rint o ies W	\$	2.30
0 12 2019	rint o ies W	\$	10.60
0 15 2019	rint o ies W	\$	1 .40
12 16 2019	rint o ies W	\$	6 .50
12 16 2019	rint olor o ies olor	\$	540.00
01 06 2020	rint o ies W	\$	1 . 0
01 06 2020	rint o ies W	\$	1 . 0
01 06 2020	rint olor o ies olor	\$	482.40
01 09 2020	rint o ies W	\$	55.10
01 09 2020	rint olor o ies olor	\$	833.60
01 13 2020	rint olor o ies olor	\$	218.40
01 1 2020	rint olor o ies olor	\$	185.60
03 19 2020	S	\$	10.80
03 20 2020	S	\$	10.80
04 01 2020	rint olor o ies olor	\$	268.80
04 01 2020	rint olor o ies olor	\$	268.80
04 2 2020	rint o ies W	\$	14.50
04 2 2020	rint olor o ies olor	\$	1,600.00
04 28 2020	rint olor o ies olor	\$	12.00
05 22 2020	DM	\$	0.50
06 03 2020	tside o in rintin ame searches er ormed or . eale .	\$	5.00
10 28 2020	rint o ies W	\$	105.20
11 12 2020	rint o ies W	\$	3.00
11 12 2020	rint olor o ies olor	\$	960.00
09 08 2021	c alde	\$	0.53
11 30 2021	. eal	\$	1.13
12 02 2021	alde	\$	0.53
09 0 2023	tside o in rintin e islati e histories com iled or hris eale .	\$	550.00

tot Co i s \$ 6, 1. 9

Co r i r r i s

02 23 2018	Deli er D,	osta e ed	irbill	89864159939 02 23 18	Deli er to 1301 la Street,	\$	12.30
05 01 2018	Deli er D,	osta e ed	irbill	80 4 52438 05 01 18	Deli er to 1301 ST,	\$	12.01
02 08 2019	Deli er 10th IS T ,	osta e ed	irbill	85389618396 02 08 19	Deli er to 411 W o rth St ,	\$	11.23
06 18 2019	Deli er S T ,	osta e ed	irbill	8 956640969 06 18 19	Deli er to 411 W 4T ST,	\$	11.32
06 21 2019	Deli er S T ,	osta e ed	irbill	88033 49043 06 21 19	Deli er to 411 W 4T ST,	\$	11.32
0 11 2019	Deli er S T ,	osta e ed	irbill	88429194302 0 11 19	Deli er to 411 W 4T ST,	\$	11.36
09 19 2019	Deli er S T ,	osta e ed	irbill	899293043 6 09 19 19	Deli er to 411 W 4T ST,	\$	11.34
09 26 2019	Deli er S T ,	osta e ed	irbill	800 5556089 09 26 19	Deli er to 411 W 4T ST,	\$	11.34
10 1 2019	Deli er S T ,	osta e ed	irbill	8032 411834 10 1 19	Deli er to 411 W 4T ST,	\$	11.34
12 02 2019	Deli er S T ,	osta e ed	irbill	8510133484 12 02 19	Deli er to 411 W 4T ST,	\$	11.32
12 1 2019	Deli er W 3, ,	osta e ed	irbill	9038616951 12 1 19	Deli er to 12444 S ST T	\$	41.84
12 18 2019	Deli er D, ,	osta e ed	irbill	90 9332 21 12 18 19	Deli er to 1530 W D T	\$	22.38
12 19 2019	Deli er S T ,	osta e ed	irbill	91130 4052 12 19 19	Deli er to 411 W 4T ST,	\$	11.34
01 02 2020	Deli er S T ,	osta e ed	irbill	938915 8 6 01 02 20	Deli er to 411 W 4th St,	\$	12.82
01 08 2020	Deli er D, ,	osta e ed	irbill	9530996103 01 08 20	Deli er to 1530 W D T	\$	38.48
01 09 2020	Deli er S T ,	osta e ed	irbill	9560193609 01 09 20	Deli er to 411 W 4T ST,	\$	12.49

01 30 2020	Deli er S T	osta e ed ,	irbill 390042133501 01 30 20	Deli er to 411 W 4T ST,	\$	12.41
02 2 2020	Deli er Street, M	osta e ed ,	irbill 390 12952229 02 2 20	Deli er to 2000 o ell	\$	15.01
02 28 2020	Deli er S T	osta e ed ,	irbill 390 356 44 6 02 28 20	Deli er to 411 W 4T ST,	\$	12.29
03 13 2020	Deli er D , ST , T	osta e ed	irbill 3910 404442 03 13 20	Deli er to 521 W ST W	\$	16.29
10 28 2020	Deli er Street, S D	osta e ed ,	irbill 398333116320 10 28 20	Deli er to 44 5 s re	\$	1 .51
10 28 2020	Deli er S,	osta e ed	irbill 398333128448 10 28 20	Deli er to 126 e Do d,	\$	1 .51
10 28 2020	Deli er Street, S S	osta e ed ,	irbill 39833314 351 10 28 20	Deli er to 6 0 D ncan	\$	31. 9
11 13 2020	Deli er Street, S D	osta e ed ,	irbill 398910401423 11 13 20	Deli er to 44 5 s re	\$	1 .48
11 13 2020	Deli er Miraloma, S J	osta e ed ST ,	irbill 398910503131 11 13 20	Deli er to 28 21 aseo	\$	19.62
11 13 2020	Deli er Street, S S	osta e ed ,	irbill 398912126042 11 13 20	Deli er to 3 3 mberland	\$	3 .05
05 16 2023	Deli er D,	osta e ed ,	irbill 3983 2114931 05 16 23	Deli er to 1530 W D T	\$	38.8
01 02 2024	Deli er , W	osta e ed ,	irbill 88 94188181 01 02 24	Deli er to 281 W T	\$	66.60
01 03 2024	Deli er ST 1285, S S	osta e ed ,	irbill 88 94488 10 01 03 24	Deli er to 8 0 M T ST	\$	33.09
01 03 2024	Deli er ST 1285, S S	osta e ed ,	irbill 88 92161686 01 03 24	Deli er to 8 0 M T ST	\$	36.38
01 03 2024	Deli er ,	osta e ed	irbill 88 92838183 01 03 24	Deli er to 30 5T ST,	\$	40.50
01 03 2024	Deli er D , ST , T	osta e ed	irbill 88 92653 84 01 03 24	Deli er to 521 W ST W	\$	43.36
01 03 2024	Deli er D,	osta e ed ,	irbill 88 93062506 01 03 24	Deli er to 1530 W D T	\$	58.00
04 1 2024	Deli er S,	osta e ed	irbill 2 3548264186 04 1 24	Deli er to 350 W 1ST ST, S	\$	19.56

05 1 2024	Deli er S,	osta e ed irbill 2 4803695233 05 1 24	Deli er to 350 W 1ST ST, S	\$	19.52
06 14 2024	Deli er S,	osta e ed irbill 2 5881508520 06 14 24	Deli er to 350 W 1ST ST, S	\$	19.45
08 02 2024	Deli er Street, S	osta e ed irbill 2 821602 60 08 02 24	Deli er to 350 West 1st Street, S,	\$	19.49
	Deli er	osta e redit		\$	61.89

tot Co ri r r i s \$ 7 4.1

i tio s

02 01 2019	T	S 206 T	e orts Jan ar 2019	\$	15.00
11 05 2019	T	S 206	loomber docket tracks docket retrie als ctober 2019	\$	15.98
01 03 2020	T	S 206	loomber docket tracks December 2019	\$.50
02 11 2020	T	S 206	loomber Docket Tracks Jan ar 2020	\$	1 .92
05 01 2020	T	S 206 T	e orts ril 2020	\$	25.00
05 05 2020	T	S 206	loomber docket tracks ril 2020	\$	0.30
06 01 2020	T	S 206 T	e orts Ma 2020	\$	5.00
11 01 2020	T	S 206 T	Searches ctober 2020	\$	110.00
09 04 2024	tside	ro essional Ser ices	blication otice	\$,800.00

tot i tio s \$ 7,996.70

Tot \$ 460,6 4.56

JANSSEN

ss M o Costs

Ad rtisi or ss m m r o tr

8 2 201	a rea e s ro e s a er d	\$	2,550.00
8 2 201	a rea e s ro e s a er d	\$	8 0.00
8 2 201	lacer earld e s a er d	\$	843.60
8 2 201	ress Democrat e s a er d	\$	1,200.00
8 2 201	So thern ali ornia e s ro e s a er d	\$	1,0 0.00
8 2 201	So thern ali ornia e s ro e s a er d	\$	1,0 0.00
8 2 201	So thern ali ornia e s ro e s a er d	\$	1,036.38
8 16 201	Montere erald d	\$	33.40
8 16 201	Sacbee d ertisin d	\$	2,455.90
8 16 201	ent ra o nt Star d	\$	1,240.00
9 13 201	ent ra o nt Star d in ent ra o nt Star	\$	1,240.00
2 12 2020	Times rintin om an 1 o o en elo es or mass mailin	\$	15 .8
	Times rintin om an 600 10 e lar n elo e on a ital		
3 16 2022	ond i ht ockle stock	\$	142.62
	tot Ad rtisi or ss m m r o tr	\$	14,609.77

rts Co s t ts

2 4 2020	Marks, alette, iessel o n , . . . d ance or osts	\$	10,000.00
4 8 2020	Marks, alette, iessel o n , . . . romodel in oices	\$	1,843. 5
	Marks, alette, iessel o n , . . . d ance or ert		
6 26 2020	osts	\$	3,600.00
6 1 2021	Marks, alette, iessel o n , . . . ert enses	\$	18,060.00
	Marks, alette, iessel o n , . . . ert e ense		
9 22 2021	reimb rsement	\$	8,141.8
	tot rts Co s t ts	\$	41,645.6

osities

11 4 2020	So th est e ortin M soke	ideo Ser ices nc ideo o dna	\$	1,962.02
11 18 2020	So th est e ortin M soke	ideo Ser ices nc Transcri t o dna	\$	1,634.66
12 2 2020	So th est e ortin a le ell	ideo Ser ices nc ideo De osition o	\$	951.6
12 9 2020	So th est e ortin Transcri t o a le ell	ideo Ser ices nc De osition	\$	1,43 .2
		tot	osities \$	5,9 5.6

Air r d t d

6 28 2023	Me an arnall 6 20 23 to 06 22 23 Tra el to mer ille erkele , ali ornia Meal, rid e Toll, and milea e		\$	3 9.5
26 2023	Tra el to erkele Meals		\$	32.46
26 2023	Tra el to erkele arkin		\$	25.80
12 14 2023	n ee 12 5 23 Tra el Meal		\$	29.68
12 21 2023	S reka arkin at reka rcata ir ort		\$	36.00
12 21 2023	i h l in oods Tra el to Te as Meal		\$	3.96
12 28 2023	1 09 24 to 01 16 24 o nd tri li hts rom reka, to stin Te as		\$	665.34
1 26 2024	Me an arnall 1 9 24 Tra el to ir ort Milea e		\$	22. 8
1 26 2024	Me an arnall 1 9 24 Tra el to Mediation Meal		\$	11.8
2 21 2024	arkin recei t rom rcata ir ort		\$	54.00
2 21 2024	eei t rom a olombe Terminal in hiladel hia, 19153		\$	14.23
2 21 2024	ab recei t rom hiladel hia Ta i		\$	45.34
2 21 2024	ood recei t rom n Mee		\$	28.68
2 21 2024	ood recei t rom Dela are orth at o is rmstron nternational ir ort enner, 0062		\$	15. 5

2 21 2024	Meal recei t rom a olombe Dil orth	\$	11.80
2 21 2024	ecei t rom Water ront o rmet a e	\$	3.24
	tot Air r d t d \$		1, 0.50

Lod i d t d

26 2023	Tra el to erkele otel	\$	202. 3
12 21 2023	The it arlton Tra el Jan ar 9th to the 12th to hiladel hia	\$	1,005.40
	tot Lod i d t d \$		1, 0 .1

T ird rt Co

2 28 2018	acer o rt Doc ments	\$	3.00
3 31 2019	acer o rt Doc ments	\$	59.00
4 30 2019	acer o rt Doc ments	\$	26. 0
6 30 2019	acer o rt Doc ments	\$	4.40
12 31 2019	acer o rt Doc ments	\$	13. 0
31 2020	acer o rt Doc ments	\$	19.80
8 31 2020	acer o rt Doc ments	\$	0.20
9 30 2020	acer o rt Doc ments	\$	88. 0
10 31 2020	acer o rt Doc ments	\$	108.90
12 31 2020	acer o rt Doc ments	\$	0.90
1 6 2021	S erior o rt o ontra osta o nt o rt e cords hase ard Ser ices Doc ment co ies, os n eles S erior o rt, ran e o nt S erior o rt, ent ra o nt S erior o rt, lameda o nt S erior o rt, Sacramento o nt	\$	13.00
1 2 2021	S erior o rt	\$	511.93
1 31 2021	acer o rt Doc ments	\$.00
1 31 2021	acer o rt Doc ments	\$	1 . 0
2 28 2021	acer o rt Doc ments	\$	3.00

3 31 2021	acer	o rt Doc ments	\$	21.00
4 30 2021	acer	o rt Doc ments	\$	11.10
6 30 2021	acer	o rt Doc ments	\$	26.20
31 2021	acer	o rt Doc ments	\$	68.20
8 31 2021	acer	o rt Doc ments	\$	0. 0
9 30 2021	acer	o rt Doc ments	\$.00
11 30 2021	acer	o rt Doc ments	\$	0. 0
12 13 2021	acer	o rt Doc ments	\$	1.20
	tot	T ird rt Co	\$	1,014.0

ost

2 4 2020	osta e		\$	241.50
5 14 2020	osta e D e		\$	0.15
5 2 2020	osta e D e		\$	0.15
12 18 2020	osta e		\$	1.95
	nited arcel Ser ice 10 14 20 Deli er to areer Smart			
10 20 2020	earnin , rea, ali ornia		\$	41.59
	nited arcel Ser ice 10 14 20 Deli er to Jose h orman,			
10 20 2020	San rancisco, ali ornia		\$	30. 0
	nited arcel Ser ice 11 3 20 Deli er to a le ell ,			
11 11 2020	Mo ntain ie , ali ornia		\$	26.99
	nited arcel Ser ice 11 3 20 Deli er to Jose h orman, San			
11 11 2020	rancisco, ali ornia		\$	26.99
	tot ost		\$	70.0
		Tot	\$	66, 1 .69

MARKS BALETTE

Mr s tt Costs

rt s Co s t ts

S erior nal tics lake eters

S S sa e ee \$1,623. 5

Work er omed on S nrise case 1524.4 ho rs \$2 5 hr \$419,210.00

roModel So t are char e \$3,845.04

tot rts Co s t ts \$4 4,67 .79

sti tio

e aladin ons ltin ro , nc. arr lemin

S T M D T \$91,421. 4

\$30.31

tot sti tio \$91,45 .05

ositio s

11 10 2020 S T W ST T D D S S D ST T S T M W D \$1,2 4.19

11 10 2020 S T W ST T D D S S D ST D M W D \$1, 45.15

12 01 2020 S T W ST T D D S S D T D \$2,9 2.61

12 01 2020 S T W ST T D D S S D T S T T D \$2,190.49

tot ositio s \$,1 .44

Co rt ort r Costs it ss id o t t m ts

12 19 2023 S T W ST T D D S S dio Transcri tion o D \$944.46

12 19 2023 S T W ST T D D S S ideo S nc Statement o M \$ 5.50

12 19 2023 S T W ST T D D S S dio Transcri tion o M \$9 2.84

12 19 2023 S T W ST T D D S S ideo S nc Statement o D \$858.00

12 19 2023 S T W ST T D D S S ideo dits o DT, J J \$825.00

12 19 2023 S T W ST T D D S S dio Transcri tion o J \$9 4.69

12 19 2023 S T W ST T D D S S dio Transcri tion o J \$ 95.66

12 19 2023 S T W ST T D D S S dio Transcri tion o DT \$ 8.61

12 19 2023 S T W ST T D D S S ideo S nc Statement o \$1,333. 5

12 19 2023 S T W ST T D D S S ideo Statement o S \$ 5.50

12 19 2023 S T W ST T D D S S ideo Statement o D \$ 5.50

12 19 2023 S T W ST T D D S S dio Transcri tion o \$85 .45

12 19 2023 S T W ST T D D S S dio Transcri tion o D \$1,00 .05

12 19 2023	S T W ST	T	D D S S	ideo Statements o J and DT	\$924.00
12 19 2023	S T W ST	T	D D S S	ideo Statement o J	\$ 5.50
12 19 2023	S T W ST	T	D D S S	ideo Statement o D	\$ 5.50
12 2 2023	S T W ST	T	D D S S	ideo Statement o	\$ 5.50
12 2 2023	S T W ST	T	D D S S	ideo Statement o	\$ 5.50
12 2 2023	S T W ST	T	D D S S	dio Transcri tion o M	\$. 0
12 2 2023	S T W ST	T	D D S S	dio Transcri tion o S	\$ 5.24
12 2 2023	S T W ST	T	D D S S	dio Transcri tion o	\$ 38.32
12 2 2023	S T W ST	T	D D S S	dio Transcri tion o J	\$ 6.16
12 2 2023	S T W ST	T	D D S S	dio Transcri tion o T	\$ 49.32
12 2 2023	S T W ST	T	D D S S	ideo Statement o M	\$920. 0
12 2 2023	S T W ST	T	D D S S	ideo Statement o S	\$858.00
12 2 2023	S T W ST	T	D D S S	ideo Statements o T, J , and	\$2,4 5.00
01 04 2024	S T W ST	T	D D S S	dio Transcri tion o M	\$1,362.35
01 04 2024	S T W ST	T	D D S S	ideo S nc Statement o M	\$1,006.50
01 04 2024	S T W ST	T	D D S S	ideo De osition nl o J	\$440.00
01 04 2024	S T W ST	T	D D S S	dio Transcri tion o D and W	\$906.62
01 04 2024	S T W ST	T	D D S S	dio Statement Transcri tion o J	\$1,254.00
01 04 2024	S T W ST	T	D D S S	dio Transcri tion o D	\$9 2.84
01 04 2024	S T W ST	T	D D S S	dio Transcri tion o S	\$1,010.68
01 04 2024	S T W ST	T	D D S S	ideo S nc Statement o D and W	\$ 5.50
01 04 2024	S T W ST	T	D D S S	ideo S nc Statement o J	\$ 5.50
01 04 2024	S T W ST	T	D D S S	dio Transcri tion o	\$859.32
01 04 2024	S T W ST	T	D D S S	dio Transcri tion o	\$ 00.15
01 04 2024	S T W ST	T	D D S S	ideo S nc Statement o	\$811.25
01 04 2024	S T W ST	T	D D S S	dio Transcri tion o	\$ 20.94
01 25 2024	S T W ST	T	D D S S	ideo Statement o	\$885.50
02 13 2024	S T W ST	T	D D S S	dio Transcri tion o	\$ 39.86

tot Co rt ort rCosts it ss id o t t m ts \$ 6,97 .46

Air r , Mi d t d

08 19 2020		Milea e	\$20. 0
10 16 2020		Milea e	\$31.05
0 20 2021		Milea e	\$12.60
12 14 2023	rent Moss	Milea e or trial re con erence	\$328.81
12 14 2023	Da id Marks	Milea e or trial re con erence	\$328.81
12 14 2023	ST M	Milea e or trial re con erence	\$328.81
1 16 0	Service	DTM ins rance or meetin	\$63.00
12 18 2023	Tra el ard	DTM tra el to hill or mediation	\$ 3.63
12 18 2023	nited irlines	DTM air are to hill or mediation	\$1,132.80
01 08 2024	Service	Tra el ins rance or Sterlin	\$53. 3

01 08 2024	Tra el ard	Tra el ins rance or Sterlin	\$112.00
01 08 2024	nited irlines	ir are or Sterlin	\$1, 50.00
01 13 2024	nited irlines	DTM tra el or S nrise mediation	\$15.20
01 13 2024	nited irlines	DTM tra el or S nrise mediation	\$525.00
01 19 2024	J T	Tra el ense	\$4.8
01 19 2024	J T	Tra el ense	\$9.32
01 19 2024	J T	Tra ele ense	\$138. 9
01 19 2024	ST M	Tra ele enses or S nrise mediation	\$134.16
01 19 2024	J T	Milea e	\$ 93.00

tot Air r ,Mi d t d \$4, 06.

ot d t d

12 01 2023	mbass S ites	oom orinter ie	\$ 32.00
12 02 2023	ier So th esort	oom orinter ie	\$534.44
12 04 2023	am ton	oom orinter ie	\$396.20
12 08 2023	otel itrine	oom orinter ie	\$402.6
12 13 2023	hase S ite otel	oom orinter ie	\$296.85
12 13 2023	D SS	oom orinter ie	\$350.00
12 14 2023	S D S	S lies or la er trial re con erence	\$684.46
12 14 2023	S D S	oods lies or la er trial re con erence	\$3, 35.00
01 10 2024	ork	Dinner ith mediation team a ter irst da o mediation	\$828.45
01 13 2024	T T T	otel 1 room 2 ni hts in hiladel hia or mediation	\$ 95.96
01 13 2024	T T T	otel 2 rooms 2 ni hts in hiladel hia or mediation	\$933.26
01 13 2024	T T T	otel on erence room char e in hiladel hia or mediation re	\$3,912.21
01 13 2024	T T T	otel meals	\$64.18
01 13 2024	T T T	otel meals	\$31.92

tot ot d t d \$1 ,697.60

Co rt Fii

11 10 2020	T	T DST D ,	\$1,051.26
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tot Co rt Fii \$1,051. 6

T ird rt Co orF d

0 10 2020	D	M ST T DTM	\$62.24
08 26 2020	D	MD T . S D.D.S	\$6 .00
08 2 2020	D	MD T J T	\$2 .28
10 14 2020	D	T ST T DS M T	\$93.91
10 16 2020	D	MD T S D T DS M T	\$130.3

01 06 2021	D	M	T	T	.	S			\$29.43
03 04 2021	D	M	.	ST					\$35.68
0 16 2021	D	MM	T	M	D				\$25.26
								tot	\$471.17
								T ird	
								rt Co	
								or F d	
								Tot	\$5 1, 1 .05

STEBNER

t r r r d i Costs

t	o r	m	M mo	mo nt
<u>rts Co s t ts</u>				
06 22 2021	ristina lores	o ember 2020	illed 12 31 20	\$ 2,800.00
06 22 2021	ristina lores	ebr ar 2021	illed 02 28 21 2 16, 2 19, 2 24, 2 25	\$ 1,400.00
06 22 2021	ristina lores	March 2021	illed 03 31 21 3 1 , 3 25	\$ 1,200.00
06 22 2021	ristina lores	ril 2021	illed 04 30 21 4 , 4 12, 4 20, 4 21, 4 2	\$ 2,000.00
06 22 2021	ristina lores	Ma 2021	illed 05 31 21 5 1, 5 2, 5 3, 5 14	\$ 1,100.00
02 28 2022	ristina lores	J ne 2021 S cs		\$ 00.00
tot				rts Co s t ts \$ 9, 00.00

ositio s

03 29 2021	So th est e ortin	ideo Se 11 13 2020 de o o Jason Malone 11280	\$ 5,06 .11
03 29 2021	So th est e ortin	ideo Se 12 02 2020 de o o Jason Malone 11291	\$ 1,815.00
04 02 2024	So th est e ortin	ideo Se 120832 2 26 21 ideo De osition o nn ace	\$ 2,368. 3
12 04 2020	TS e ortin , nc.	2025910 8 5 20 Witness aroline omeo De osition	\$ 350.00
tot			ositio s \$ 9,600. 4

st L is

04 13 201	e is e is online	To record Jan 201 e is e is online	\$ 5.36
04 13 201	West a	Mar 201 West a n o. S cs S nrise	\$ 26.50
05 15 201	West a	n 8360638 4 West n o. h s	\$ 10.41
06 19 201	West a	Ma 201 West a n o. S cs S nrise	\$ 2.33
08 1 201	West a	J l 201 West a n o. S nrise	\$ 3.4
09 1 201	West a	201 West a n o. S cs S nrise	\$ 1 .56
10 26 201	West a	Se t 201 836935 12 S nrise	\$ 2.8

12 15 201	West a	Mar 201	West a	n o. S cs S nrise	\$.12
03 22 2018	West a	eb 2018	West a	n o. S cs S nrise	\$	52.96
02 19 2019	West a	Jan 2019	West a	n o. S cs S nrise	\$	198.39
06 1 2019	West a	n 8403 9395			\$	41. 5
0 18 2019	West a	J ne 2019	West a	n o. S cs S nrise eredia	\$	62.31
10 31 2019	West a	S nrise			\$.23
04 10 2020	West a	March 2020	West a	n o. S cs	\$	8.2
05 11 2020	West a	ril 2020	West a	n o. S cs S nrise	\$	408.66
06 13 2020	West a	Ma 2020	West a	n o. S cs	\$	135.18
0 09 2020	West a	J ne 2020	West a	n o. S cs S nrise	\$	212.23
08 10 2020	West a	J l 2020	West a	n o. S cs	\$	49.05
09 04 2020	West a	st 2020	West a	n o. S cs	\$	3 5. 5
10 12 2020	West a	Se 2020	West a	n o. S cs	\$	441.19
11 05 2020	West a	ct 2020	West a	n o. S cs	\$	85.62
12 05 2020	West a	o 2020	West a	n o. S cs	\$	4 9.85
01 04 2021	West a	December 2020	West a	n o. S cs	\$	18.82
02 10 2021	West a	Jan 2021	West a	n o. S cs	\$	656.95
03 08 2021	West a	n 843938998 eb.	West a		\$	8 .98
04 06 2021	West a	March 2021			\$	662.29
08 13 2021	West a	J l 2021	West a	n o. S cs S nrise lass ert	\$	246.30
09 0 2021	West a	st 2021	West a	n o. S cs	\$	3.54
10 08 2021	West a	Se t 2021	West a	n o. S cs	\$	303.54
11 04 2021	West a	ctober n oice 8452 6082			\$	198.13
12 06 2021	West a	o ember 2021	West a	n o. S cs	\$	3.59
01 13 2022	West a	December 2021	West a	n o. S cs	\$	5 5.39
02 08 2022	West a	Jan 2022	West a	n o. S cs	\$	12.09
03 10 2022	West a	ebr ar 2022	West a	n o. S cs	\$	122.0
05 24 2022	West a	ril Westla			\$	108.13
10 1 2022	West a	Se t 2022	West a	ro le	\$	192.54
01 24 2023	West a	Dec 2022	West a	ro le	\$	206.00
12 24 2022	West a	o 2022	Westla		\$	566.08
02 24 2023	West a	Jan 2023	West a	ro le eal	\$	28.50
03 24 2023	West a	eb 2023	West a	ro le	\$	133.26
04 24 2023	West a	March 2023	West a	ro le	\$	180. 3
05 25 2023	West a	ril 2023	West a	ro le eal	\$	4.35
06 24 2023	West a	Ma 2023	West a	ro le	\$	89. 0

01	2023	West a	June 2023 West a	role n 84856969	\$	166.8
08	2023	West a	July 2023 West a	role	\$	359.31
12	2023	West a	October 2023 West a	role	\$	314.8
02	2024	West a	January 2024 West a	role	\$	2.05
03	2024	West a	February 2024 West a	role	\$	22.60
05	2024	West a	April 2024 West a	role	\$	6.01

tot st L is \$ 9,650.57

Air r d r t d

03	09	201	ell J na	2 13 ir are, i car to Meet otential class re in . . on 3 3 1	\$	211.44
03	09	201	ell J na	2 1 ir are to Meet otential class re in ran e o nt on 3 9 1	\$	255.83
04	03	201	ell J na	3 3, 3 9, 3 13 Mt s.in rbank, otential S nrise class re s ir are, ental ar, ttn Meals	\$	419.2
01	16	2024	arkin ara e	S	\$	108.00

tot Air r d t d \$ 994.99

Lod i d r t d

01	16	2024	otel ccomodatons	it arlton, hiladel hia	\$	89.94
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tot Lod i d t d \$ 79.94

Attor r i s

02	23	201	ishkin Slatter	2 4 2 19 1	\$	50.00
04	10	201	est Disco er Ser ices	M 00036 blc ecords Seach	\$	25.80
04	0	201	est Disco er Ser ices	M 00035 blc ecords Seach	\$	664.00
06	01	201	est Disco er Ser ices	M 00036 ecords S nrise Westlake l	\$	240.00
06	01	201	est Disco er Ser ices	M 00035 ecords S nrise e erl ills	\$	48.20

08 14 201	ederal	ress	5 880 69168	19 to . an S nrise	\$	25.19
10 12 201	TT	e on	9 1	S nrise	\$	2.41
10 19 201	360	nc.	1690 8 28 1	10 1	\$	4,990.00
10 26 201	ishkin	Slatter	9 5	stmt or s cs 9 15 1	\$	190.00
03 01 2018	ederal	ress	6 090 48960 2 8	to eredia S nrise	\$	39. 1
03 12 2018	ederal	ress	6 105 1 4 2 23	to . eredia S nrise	\$	36.4
05 08 2018	acer	Ser ice enter	1 1 3 31	18	\$	11.90
08 03 2018	acer	Ser ice enter	6 6	o rt ecords 18 s	\$	1.80
08 03 2018	acer	Ser ice enter	6 30	o rt ecords 113 s	\$	11.30
09 20 2018	S nrise	lass ction 1 1	S nrise e Mt . ash de	ttn Meal	\$	1 .38
11 26 2018	360	nc.	2021	o ard back ro nd 10 15	\$	450.00
11 26 2018	360	nc.	2021	Datababase e bankr tc	\$	50.00
02 28 2019	ederal	ress	6 469 19654 2 15	to SD , entral	\$	35.4
05 0 2019	acer	Ser ice enter	1 1 3 31 19 100	a es 2 , 2 15, 2 2 o rt ecords	\$	10.00
08 10 2019	acer	Ser ice enter	4 1 6 30 19 8	a es 4 11 19, 5 24 19	\$.80
09 12 2019	TT	e on	8 23	Tel on	\$	2.99
09 12 2019	TT	e on	8 28	Tel on	\$	5.03
01 0 2020	acer	Ser ice enter	10 1 12 31 19	o rt ecords	\$	30.20
01 21 2020	TT	e on	12 13	Tel on . S nrise	\$	15.1
01 30 2020	ederal	ress	6 90 40595 1 15, 1 1	to Schneider, Wallace S nrise	\$	29.99
01 30 2020	ederal	ress	6 90 40595 1 1	to an S nrise	\$	19.28
01 30 2020	ederal	ress	6 90 40595 1 1	to earn S nrise	\$	18. 3
03 16 2020	TT	e on	2 5	S nrise	\$	2.89
03 16 2020	TT	e on	2 26	S nrise	\$	15.28
03 16 2020	ederal	ress	6 949 91320 3 2	to onJ arl ed ld Santa na	\$	1 .36
03 30 2020	ederal	ress	6 95 14 43 3 4	to an	\$	21.31
04 10 2020	acer	Ser ice enter	1 3 1 3 31		\$	6 .60
06 13 2020	TT	e on	5 5 , 5 11	Tel con S nrise	\$	80.45
08 10 2020	acer	Ser ice enter	4 1 6 30		\$	32.10
08 1 2020	TT	e on	22		\$	96.94
09 22 2020	TT	e on	8 12	Tel con .	\$	4. 4
09 22 2020	TT	e on	8 28	Tel con	\$	4.98
10 10 2020	acer	Ser ice enter	1 9 30 20	o rt ecords	\$	1 0.10
10 22 2020	TT	e on	9 11	Tel on S nrise	\$	3.16
11 1 2020	TT	e on	10 9		\$	21.93
11 20 2020	ederal	ress	n 180 88418 11 10	to J Malone,	\$	50.26

11 20 2020	ederal	ress	n 180 88418 11 11 to J orman, S	\$	23.31
01 14 2021	TT	e on	12 16 Tel on	\$	23.45
02 03 2021	acer Ser	ice enter	10 1 12 31 20 o rt ecords	\$	165.90
02 10 2021	TT	e on	1 21 Tel con	\$	3. 0
02 11 2021	acer Ser	ice enter	Jan 2021 S o rts	\$	91.60
03 16 2021	TT	e on	2 5 Tel n S nrise	\$	32.66
03 16 2021	TT	e on	2 22 Tel on S nrise	\$	18.54
04 10 2021	acer Ser	ice enter	cct 3430204 1 1 3 31 21	\$	90.00
04 20 2021	TT	e on	3 10, 3 22	\$	68.96
11 10 2021	TT	e on	10 11 S nrise	\$	10.56
12 1 2021	TT	e on	11 29 Tel on S nrise	\$	26.69
01 13 2022	TT	e on	12 3	\$	9. 3
02 10 2022	acer Ser	ice enter	10 1 21 12 31 21 o rt ecords	\$	83.30
05 10 2022	acer Ser	ice enter	1 2022 1 1 3 1 22	\$	89.30
10 28 2022	acer Ser	ice enter	1 9 30 22 o rt ecords lass ert, eal	\$	46.20
02 01 2023	acer Ser	ice enter	10 1 12 31 22	\$	3. 0
05 10 2023	acer Ser	ice enter	1 1 3 31 2023	\$	55.90
08 10 2023	acer Ser	ice enter	4 1 6 30 23 o rt ecords	\$	15.80
05 10 2024	acer Ser	ice enter	1 2024	\$	11.50
08 0 2024	acer Ser	ice enter	4 1 6 30 24 o rt lectronic ecords	\$	22.90
02 03 2020	M S,	TT , SS	11 5 18 12 31 19 tside osts allocated	\$	10,000.00
0 13 2020	M S,	TT , SS	S nrise	\$	3,600.00
06 18 2021	S nrise	lass ction 1 1	D T s a ment share o ristina lores endin in oices or e ert cons ltation total \$8,500...	\$	8,500.00
				tot Attor r i s \$	14,901.6

Co rt Fi i

06 29 201	lerk o the o rt S erior	S mmons on om laint ss ed	\$	2.00
08 14 201	ne e al	109 1030 S mmons om laint	\$	1,686.95
09 05 201	ne e al	11022822 arte lication or tension o Time to Ser e leadin and rders S	\$	129.40

09 06 201	lerko the o rt S erior	om laint Motion resched le, Determ. earin . t. time ranted	\$	8.50
10 11 201	lerko the o rt S erior	lic. tension o time iled lameda o nt S erior o rt	\$	5.00
10 26 201	ne e al	11092853 erem tor hallen e S S nrise	\$	69.40
10 26 201	ne e al	110 5 54 arte lication, tension S S nrise	\$	129.15
11 29 201	lerko the o rt S erior	lameda o nt lication to Time ranted	\$	5.50
12 04 201	ne e al	11123298 arte lic. M lameda nt S . t.	\$	129.15
12 04 201	ne e al	11132424 M on . Stmt. lameda nt S . t.	\$	69.40
01 29 2018	ne e al	11168219 roo o S c.,S mmons	\$	51.95
0 22 2019	lerko the o rt S erior	o nt o lameda	\$	5.00
09 22 2020	ne o r Deli er	6 5539 ilin \$89 SD Santa na	\$	99.68
09 30 2020	ne o r Deli er	6 6052 SD ilin \$100	\$	112.00
tot Co rt Fi i			\$,50 .0

ro dTr s ort tio

06 08 201	ell J na	5 15 Meetin ith otential class re S nrise arkin , toll, milea e, attn meals	\$	1.48
08 0 201	ell J na	20 S nrise Mt lass e lameda 21 Mt lass e in San a ael i car, toll, attn ...	\$	102.83
10 31 201	ell J na	10 6 S nrise mt . lass e ,San a ael i car,Toll, arkin , Meal	\$	64.85
03 16 2020	rian S m ierre	2 3, 2 6, 2 20 2 28 20 ber to rom Schneider Wallace or an earn de o re de o...	\$	5.29
tot ro dTr s ort tio			\$	14.45

Tot 4 ,045.49

SCHNEIDER WALLACE

<u>id</u>	<u>r</u>	<u>Costs</u>							
03 15 2020	astro, o dres	nch ase elated 2 28 20	De osition o	lient at SW	o ice Door Dash	\$		28.54	
03 15 2020	astro, o dres	nch ase elated 2 28 20	De osition o	lient at SW	o ice Door Dash	\$		28.55	
09 15 2020	astro, o dres	Snacks e era es ase elated 5 18 20	W hile orkin	on ilin	or class	\$		10.55	
09 15 2020	astro, o dres	Snacks e era es ase elated 14 20	W snack d rin			\$		5. 2	
09 15 2020	astro, o dres	Snacks e era es ase elated 14 20	W snack d rin			\$		5. 3	
09 15 2020	astro, o dres	cert motion Starb cks				\$		10.55	
06 30 2023	astro, o dres	nch dmin 6 20 23	W n erson moot	b s a e		\$		210.68	
						tot	Ci t	t dM s	\$ 00.

<u>ti</u>	<u>it</u>	<u>o</u>	<u>m</u>	<u>tM</u>	<u>m</u>	<u>t</u>		
11 30 2019	J D eDisco er	Monthl	ostin	o 2019 100	De erred	\$		605.63
12 31 2019	J D eDisco er	Monthl	ostin	o ember 2019	S lit nkno n	\$		835.50
01 31 2020	J D eDisco er	Monthl	hostin	Jan ar 2020		\$		84.88
01 31 2020	J D eDisco er	Monthl	hostin	Jan ar 2020		\$		84.8
02 29 2020	J D eDisco er	Monthl	hostin	ebr ar 2020		\$		1,080.19
02 29 2020	J D eDisco er	Monthl	hostin	ebr ar 2020		\$		1,080.19
03 31 2020	J D eDisco er	Monthl	hostin	March 2020		\$		1,925.06
03 31 2020	J D eDisco er	Monthl	hostin	March 2020		\$		1,925.0
04 30 2020	J D eDisco er	Monthl	hostin	ril 2020		\$		2,433.56
04 30 2020	J D eDisco er	Monthl	hostin	ril 2020		\$		2,433.5
05 31 2020	J D eDisco er	Monthl	hostin	Ma 2020		\$		2,386.12
05 31 2020	J D eDisco er	Monthl	hostin	Ma 2020		\$		2,386.13
06 30 2020	J D eDisco er	Monthl	hostin	J ne 2020 100	De erred	\$		4,322.25
0 31 2020	J D eDisco er	Monthl	hostin	J l 2020 100	De erred	\$		2,585.25
0 31 2020	J D eDisco er	Monthl	hostin	J l 2020 100	De erred	\$		2,585.25
08 31 2020	J D eDisco er	Monthl	hostin	st 2020 100	De erred	\$		2, 48.00

08 31 2020	J D eDisco er	Monthl hostin	st 2020	100	De erred	\$	2, 48.00
09 30 2020	J D eDisco er	Monthl hostin	Se tember 2020	100	De erred	\$	2,554.50
09 30 2020	J D eDisco er	Monthl hostin	Se tember 2020	100	De erred	\$	2,554.50
10 31 2020	J D eDisco er	Monthl hostin	ctober 2020	100	De erred	\$	2, 14.62
10 31 2020	J D eDisco er	Monthl hostin	ctober 2020	100	De erred	\$	2, 14.63
11 30 2020	J D eDisco er	Monthl hostin	o ember 2020	100	De erred	\$	2,52 .50
11 30 2020	J D eDisco er	Monthl hostin	o ember 2020	100	De erred	\$	2,52 .50
12 31 2020	J D eDisco er	Monthl hostin	December 2020	100	De erred	\$	2, 80.81
12 31 2020	J D eDisco er	Monthl hostin	December 2020	100	De erred	\$	2, 80.82
01 31 2021	J D eDisco er	Monthl hostin	Jan ar 2021	100	De erred	\$	5,802. 5
02 28 2021	J D eDisco er	Monthl hostin	ebr ar 2021	100	De erred	\$	2, 44.0
02 28 2021	J D eDisco er	Monthl hostin	ebr ar 2021	100	De erred	\$	2, 44.06
03 31 2021	J D eDisco er	Monthl hostin	March 2021	100	De erred	\$	2,988.00
03 31 2021	J D eDisco er	Monthl hostin	March 2021	100	De erred	\$	2,988.00
04 30 2021	J D eDisco er	Monthl hostin	ril 2021	100	De erred	\$	2,80 .0
04 30 2021	J D eDisco er	Monthl hostin	ril 2021	100	De erred	\$	2,80 .06
05 31 2021	J D eDisco er	Monthl hostin	Ma 2021	100	De erred	\$	2, 8.94
05 31 2021	J D eDisco er	Monthl hostin	Ma 2021	100	De erred	\$	2, 8.94
06 30 2021	J D eDisco er	Monthl hostin	J ne 2021	100	De erred	\$	2, 84.5
06 30 2021	J D eDisco er	Monthl hostin	J ne 2021	100	De erred	\$	2, 84.56
0 31 2021	J D eDisco er	Monthl hostin	J l 2021	100	De erred	\$	2,6 2.0
0 31 2021	J D eDisco er	Monthl hostin	J l 2021	100	De erred	\$	2,6 2.06
08 31 2021	J D eDisco er	Monthl hostin	st 2021	100	De erred	\$	2, 28.32
08 31 2021	J D eDisco er	Monthl hostin	st 2021	100	De erred	\$	2, 28.31
09 30 2021	J D eDisco er	Monthl hostin	Se tember 2021	100	De erred	\$	5,869.50
10 31 2021	J D eDisco er	Monthl hostin	ctober 2021	100	De erred	\$	5,588.25
11 30 2021	J D eDisco er	Monthl hostin	o 2021		De erred	\$	5,588.25
12 31 2021	J D eDisco er	Monthl hostin	Dec 2021		De erred	\$	5,588.25
01 31 2022	J D eDisco er	J D Monthl hostin	Jan 2022		De erred	\$	5,588.25
02 28 2022	J D eDisco er	J D Monthl hostin	eb 2022		De erred	\$	5,588.25
03 31 2022	J D eDisco er	J D Monthl hostin	March 2022		De erred	\$	5,588.25
04 30 2022	J D eDisco er	J D Monthl hostin	ril 2022		De erred	\$	5,588.25
05 31 2022	J D eDisco er	J D Monthl ostin	Ma 2022		De erred	\$	5,588.25
06 30 2022	J D eDisco er	J D Monthl hostin	J n 2022		De erred	\$	5,588.25
0 31 2022	J D eDisco er	J D Monthl ostin	J l 2022		De erred	\$	5,588.25
08 31 2022	J D eDisco er	J D Monthl ostin	2022		De erred	\$	5,588.25

09 30 2022	J D eDisco er	J D Monthl	ostin	Se 2022	De erred				\$	5,588.25
10 31 2022	J D eDisco er	J D Monthl	ostin	ct 2022	De erred				\$	5,588.25
11 30 2022	J D eDisco er	J D Monthl	ostin	o 2022	De erred				\$	5,588.25
12 31 2022	J D eDisco er	J D Monthl	ostin	Dec 2022	De erred				\$	5,588.25
01 31 2023	J D eDisco er	J D Monthl	ostin	Jan 2023	De erred				\$	5,881.29
02 28 2023	J D eDisco er	J D Monthl	ostin	eb 2023	De erred				\$	5,881.29
03 31 2023	J D eDisco er	J D Monthl	ostin	Mar 2023	De erred				\$	5,881.29
04 30 2023	J D eDisco er	J D Monthl	ostin	r 2023	De erred	elati it	1 ser		\$	3, 52. 9
05 31 2023	J D eDisco er	J D Monthl	ostin	Ma 2023	De erred				\$	3, 52. 9
06 30 2023	J D eDisco er	J D Monthl	ostin	J ne 2023	De erred				\$	3, 52. 9
0 31 2023	J D eDisco er	J D Monthl	ostin	J l 2023	De erred				\$	3, 52. 9
08 31 2023	J D eDisco er	J D Monthl	ostin	2023	De erred				\$	3, 52. 9
09 30 2023	J D eDisco er	J D Monthl	ostin	Se 2023	De erred				\$	3, 52. 9
10 31 2023	J D eDisco er	J D Monthl	ostin	ct 2023	De erred				\$	3, 52. 9
11 30 2023	J D eDisco er	J D Monthl	ostin	o 2023	De erred				\$	6,601.69
12 31 2023	J D eDisco er	J D Monthl	ostin	Dec 2023	De erred				\$	5,655.69
01 31 2024	J D eDisco er	J D Monthl	ostin	Jan 2024	De erred				\$	5,655.69
02 29 2024	J D eDisco er	J D Monthl	ostin	eb 2024	De erred				\$	5,655.69
03 31 2024	J D eDisco er	J D Monthl	ostin	Mar 2024	De erred				\$	5,655.69
04 30 2024	J D eDisco er	J D Monthl	ostin	r	De erred				\$	5, 3.94
05 31 2024	J D eDisco er	J D Monthl	ostin	Ma	De erred				\$	1,051.85
06 30 2024	J D eDisco er	J D Monthl	ostin	J ne 2024	De erred				\$	1,051.85
0 31 2024	J D eDisco er	J D Monthl	ostin	J l 2024	De erred				\$	1,051.85
08 31 2024	J D eDisco er	J D Monthl	ostin	2024	De erred				\$	1,051.85
		tot	ti it	o m t M	m t				\$	7 ,4 5.6

is o r r

08 0 2020	J dicate West	Mediation ees	ase Mana ement ee	etainer	aid 100				\$,8 5.00
08 0 2020	J dicate West	Mediation ees	ase Mana ement ee	etainer	aid 100				\$,8 5.00
10 19 2020	J dicate West	S ecial Master Ser ices	09 10 20 10 06 20	illed o r 50	Share				\$	8,362.50
10 19 2020	J dicate West	esearch ttorne Ser ices	09 25 20 10 06 20	illed o r 50	Share				\$	1,125.00
10 19 2020	J dicate West	S ecial Master Ser ices	09 10 20 10 06 20	illed o r 50	Share				\$	8,362.50
10 19 2020	J dicate West	esearch ttorne Ser ices	09 25 20 10 06 20	illed o r 50	Share				\$	1,125.00
10 19 2020	J dicate West	esearch ttorne Ser ices	etainer	illed o r 50	Share				\$	50.00

10 19 2020	J dicate West	esearch ttorne Ser ices etainer illed o r 50 Share	\$	50.00
11 16 2020	J dicate West	esearch ttorne Ser ices 10 26 20 11 11 20 aid 100 o lainti s Share	\$	600.00
11 16 2020	J dicate West	esearch ttorne Ser ices 10 26 20 11 11 20 aid 100 o lainti s Share	\$	600.00
03 09 2022	J dicate West	11 20 02 16 22 illin time in ested b o r S ecial Master and his esearch ttorne e...	\$	9, 50.00
tot di t st is o r r			\$	47,175.00

rts

03 31 2024	ristina lores, hd,	03 12 24 03 15 24 ert Ser ices aid 100	\$	800.00
02 05 2020	Marks alette iessel o n	eimb rse 1 3 o \$453,1 9.08 20 o \$150 to this case e ert ees to Marks, alette, iessel ...	\$	15,000.00
02 05 2020	Marks alette iessel o n	eimb rse 1 3 o \$453,1 9.08 20 o \$150 to this case e ert ees to Marks, alette, iessel ...	\$	15,000.00
06 08 2020	Marks alette iessel o n	eimb rse 1 3 o \$162,000.00 20 o \$54 to this case to Marks, alette, iessel o n or e...	\$	5,400.00
06 08 2020	Marks alette iessel o n	eimb rse 1 3 o \$162,000.00 20 o \$54 to this case to Marks, alette, iessel o n or e...	\$	5,400.00
11 14 2020	Marks alette iessel o n	eimb rsement or ert itness in oices in S nrise case aid 100	\$	32,389.18
11 14 2020	Marks alette iessel o n	eimb rsement or ert itness in oices in S nrise case aid 100	\$	32,389.18
06 30 2021	Marks alette iessel o n	eimb rsement or ert itness in oices in S nrise case aid 100	\$	35,000.00
06 30 2021	Marks alette iessel o n	eimb rsement or ert itness in oices in S nrise case aid 100	\$	35,000.00
09 22 2021	Marks alette iessel o n	eimb rsement or ert itness in oices in S nrise case SW Share	\$	15,000.00
09 22 2021	Marks alette iessel o n	eimb rsement or ert itness in oices in S nrise case SW share	\$	15,000.00
tot rts			\$	06, 7 . 6

rC r s

11 04 201	acer	acer Doc ment etrie al T 3 201	\$	5 .50
08 09 2018	acer	acer Doc ment etrie al T 2 2018	\$	0.80
02 08 2019	acer	acer Doc ment etrie al T 4 2018	\$	11.00
08 05 2019	acer	acer Doc ment etrie al T 2 2019	\$	1.10
02 06 2020	acer	acer Doc ment etrie al T 4 2019	\$	0.50

02 06 2020	acer	acer Doc ment etrie al	T 4 2019	\$	0.50
05 0 2020	acer	acer Doc ment etrie al	T 1 2020	\$	0.10
05 0 2020	acer	acer Doc ment etrie al	T 1 2020	\$	0.10
08 10 2020	acer	acer Doc ment etrie al	T 2 2020	\$	0.10
08 10 2020	acer	acer Doc ment etrie al	T 2 2020	\$	0.10
09 30 2020	acer	acer Doc ment etrie al	T 3 2020	\$	13.35
09 30 2020	acer	acer Doc ment etrie al	T 3 2020	\$	13.35
02 11 2021	acer	acer Doc ment etrie al	T 4 2020	\$	6.30
02 11 2021	acer	acer Doc ment etrie al	T 4 2020	\$	6.30
05 06 2021	acer	acer Doc ment etrie al	T 1 2021	\$	2 .90
08 12 2021	acer	acer Doc ment etrie al	T 2 2021	\$	48.00
11 08 2021	acer	acer Doc ment etrie al	T 3 2021	\$	28.00
01 10 2022	acer	acer Doc ment etrie al	T 4 2021	\$	42.50
05 06 2022	acer	acer Doc ment etrie al	T 1 2022	\$	63.30
08 09 2022	acer	acer Doc ment etrie al	T 2 2022	\$	28.90
10 01 2022	acer	acer Doc ment etrie al	T 3 2022	\$	66.80
01 01 2023	acer	acer Doc ment etrie al	T 4 2022	\$	36.40
04 01 2023	acer	acer Doc ment etrie al	T 1 2023	\$	35.60
06 30 2023	acer	acer Doc ment etrie al	T 2 2023	\$	33.00
10 01 2023	acer	acer Doc ment etrie al	T 3 2023	\$	35.10
12 31 2023	acer	acer Doc ment etrie al	T 4 2023	\$	29.30
03 31 2024	acer	acer Doc ment etrie al	T 1 2024	\$	160.20
		tot r C r s		\$	1,446.10

Co rt r i s

12 31 2020	SW	osta e 01 01 2020	12 31 2020	\$	0.50
12 31 2020	SW	o ies and rintin rom o Track S stem	2015 2020	\$	962. 5
03 31 2023	SW	o ies and rintin rom Shared rintin	2021 2023	\$	483.00
03 14 2023	e Data Disco er nc.	rintin indin aid 100		\$	3, 68.59
		tot Co i s ost		\$	5, 14. 4

02 26 2021	Titan e al Ser ices, nc.	asic har e, rocess Ser ice ee		\$	2.50
02 26 2021	Titan e al Ser ices, nc.	asic har e, rocess Ser ice ee		\$	2.50
02 26 2021	Titan e al Ser ices, nc.	asic har e, rocess Ser ice ee, stodian Witness ee, ee d ancement hai		\$	114.50

02 26 2021 Titan e al Ser ices, nc.	asic har e, rocess Ser ice ee, stodian Witness ee, ee d ancement hai	\$	114.50
	tot Co rt r i s	\$	74.00

ositio s

02 28 2020 TS e ortin , nc.	eredia, dre .S nrise Senior Witness lise an erti ied Transcri t o	\$	48.30
02 28 2020 TS e ortin , nc.	eredia, dre .S nrise Senior Witness lise an erti ied Transcri t o	\$	48.30
03 23 2020 TS e ortin , nc.	eredia, dre .S nrise Senior Witness m earn erti ied Transcri t c	\$	1,163.65
03 23 2020 TS e ortin , nc.	eredia, dre .S nrise Senior Witness m earn erti ied Transcri t c	\$	1,163.65
08 20 2020 TS e ortin , nc.	08 05 20 Doc ment Translation aid 100 er	\$	488.80
08 20 2020 TS e ortin , nc.	08 05 20 Doc ment Translation aid 100 er	\$	488.80
08 25 2020 TS e ortin , nc.	0 22 20 Doc ment Translation aid 100 er	\$	481.35
08 25 2020 TS e ortin , nc.	0 22 20 Doc ment Translation aid 100 er	\$	481.35
08 2 2020 TS e ortin , nc.	08 13 20 erti ied Transcri t Tan a ook Wicht	\$	69.85
08 2 2020 TS e ortin , nc.	08 13 20 erti ied Transcri t Tan a ook Wicht	\$	69.85
	tot Co rt ort r	\$	7, 0 .90

st L is

08 01 201 West a ment enter	esearch 0 01 0 31 1	\$	183.83
03 01 2018 West a ment enter	esearch 02 01 02 28 18	\$	16.54
05 01 2018 West a ment enter	esearch 04 01 04 30 18	\$	11.23
0 01 2018 West a ment enter	esearch 06 01 06 30 18	\$	6. 3
12 01 2018 West a ment enter	esearch 11 01 11 30 18	\$	9.48
01 01 2019 West a ment enter	esearch 12 01 12 31 18	\$	9.48
08 01 2019 West a ment enter	esearch 0 01 19 0 31 19	\$	8.83
10 02 2019 West a ment enter	esearch 09 01 19 09 30 19	\$	35.84
10 31 2019 West a ment enter	esearch 10 01 19 10 31 19	\$	14.36
10 01 2022 West a ment enter	esearch 09 01 22 09 30 22	\$	1,850.33
11 01 2022 West a ment enter	esearch 10 01 22 10 31 22	\$	455.69
12 01 2022 West a ment enter	esearch 11 01 22 11 31 22	\$	22.84
12 01 2022 West a ment enter	esearch 11 01 22 11 31 22	\$	34.26
01 01 2023 West a ment enter	esearch 12 01 22 12 31 22	\$	1,344.86
02 02 2023 West a ment enter	Thomson e ters esearch 01 01 2023 01 31 23	\$	1,125.1

04 01 2023	West a ment enter	Thomson e ters esearch	03 01 23	03 31 23	\$	166.20
05 01 2023	West a ment enter	Thomson e ters esearch	04 01 23	04 30 23	\$	1.64
06 01 2023	West a ment enter	Thomson e ters esearch	05 01 23	05 31 23	\$	55 .86
		tot st L is			\$	5, 55.17

04 30 2020	nc D e is e is	eriod 04 01 20	04 30 20	\$	0.22
04 30 2020	nc D e is e is	eriod 04 01 20	04 30 20	\$	0.23
05 31 2020	nc D e is e is	eriod 05 01 20	05 31 20	\$	1.00
05 31 2020	nc D e is e is	eriod 05 01 20	05 31 20	\$	0.99
06 30 2020	nc D e is e is	eriod 06 01 20	06 30 20	\$	5.32
06 30 2020	nc D e is e is	eriod 06 01 20	06 30 20	\$	5.32
0 31 2020	nc D e is e is	eriod 0 01 20	0 31 20	\$	6.00
0 31 2020	nc D e is e is	eriod 0 01 20	0 31 20	\$	5.99
08 31 2020	nc D e is e is	eriod 08 01 20	08 31 20	\$	3.01
08 31 2020	nc D e is e is	eriod 08 01 20	08 31 20	\$	3.02
09 30 2020	nc D e is e is	eriod 09 01 20	09 30 20	\$.5
09 30 2020	nc D e is e is	eriod 09 01 20	09 30 20	\$.58
11 06 2020	nc D e is e is	eriod 10 01 20	10 31 20	\$	9.80
11 06 2020	nc D e is e is	eriod 10 01 20	10 31 20	\$	9.80
12 02 2020	nc D e is e is	eriod 11 01 20	11 30 20	\$	0.43
12 02 2020	nc D e is e is	eriod 11 01 20	11 30 20	\$	0.42
03 01 2021	nc D e is e is	eriod 02 01 21	02 28 21	\$	8.28
03 01 2021	nc D e is e is	eriod 02 01 21	02 28 21	\$	8.28
10 01 2021	nc D e is e is	eriod 09 01 21	09 30 21	\$	2.32
12 01 2021	nc D e is e is	eriod 11 01 21	11 30 21	\$	21.35
12 31 2021	nc D e is e is	eriod 12 01 21	12 31 21	\$	1.53
01 31 2022	nc D e is e is	eriod 01 01 22	01 31 22	\$	11.55
02 28 2022	nc D e is e is	eriod 02 01 22	02 22 22	\$	42.52
08 31 2022	nc D e is e is	eriod 08 01 22	08 31 22	\$	224.30
09 30 2022	nc D e is e is	eriod 09 01 22	09 30 22	\$	1,436.15
01 31 2023	nc D e is e is	eriod 01 01 23	01 31 23	\$	4 .65
02 28 2023	nc D e is e is	eriod 02 01 23	02 28 23	\$	8. 4
03 31 2023	nc D e is e is	eriod 03 01 23	03 31 23	\$	28.4
		tot st L is		\$	1,907. 4

Tot \$ 54 , 1.15

THAMER

Mi . T m r Costs

11 1 201	\$	5.00	Shell il el
11 1 201	\$	23.5	li er Ser ice err
11 2 201	\$	108.90	otel Sa salito od in
12 3 2018	\$	65.53	Shell il el
12 3 2018	\$	16.8	Shell il el
12 6 2018	\$	3 8.63	alace otel od in
12 6 2018	\$	5.00	nion 6 el
12 6 2018	\$	12.50	li er Ser ice err
12 2018	\$	95.00	Shell il el
12 31 2019	\$	435.6	So th est ir are
1 6 2020	\$	99.52	he ron el
1 8 2020	\$	81.11	nter rise ar rental
1 8 2020	\$	4.8	he ron el
1 8 2020	\$	58.00	Sacramento ir ort arkin
12 4 2023	\$	0.66	he ron el
12 5 2023	\$	168.90	laska irlines ir are
12 8 2023	\$	198.20	laska irlines ir are
12 9 2023	\$	61.60	o es 28 el
12 9 2023	\$	69.58	reka ro el
1 9 2024	\$	691.20	it hiladel hia otel
1 9 2024	\$	126.06	he ron el
1 9 2024	\$	109.5	shland S rin s el
1 9 2024	\$	856.40	Delta ir are
1 11 2024	\$	59.64	nion 6 el
1 11 2024	\$	518.	it hiladel hia otel
1 11 2024	\$	42.40	ber
1 11 2024	\$	45.00	Med ord ir ort arkin

Total \$ 4,618.60

EXHIBIT 3

ris C s Costs rit O s rit o s

Firm	t	s ri tio	Amo t
to s			
	11 01 201	Meals hristo her J. eale , e era e be ore tr	\$ 2.10
	11 01 201	Meals hristo her J. eale , e era e be ore tr	\$ 3.09
	05 29 2018	Meals hristo her J. eale , reak ast snack	\$ 2.50
	06 0 2018	Meals hristo her J. eale , reak ast at air c	\$ 1.4
	06 0 2018	Meals hristo her J. eale , reak ast at air c	\$ 4.2
	06 0 2018	Meals hristo her J. eale , reak ast Team n	\$ 11.18
	06 0 2018	Meals hristo her J. eale , Dinner a ter mee	\$ 20.39
	06 08 2018	Meals hristo her J. eale , l nch at air ort a	\$ 1.5
	12 06 2018	Meals hristo her J. eale , Dinner a ter S nris	\$ 3.00
	12 06 2018	Meals hristo her J. eale , Dinner a ter S nris	\$ 9.49
	12 06 2018	Meals hristo her J. eale , nch be ore S nri	\$ 15.08
	03 21 2019	Meals hristo her J. eale , ttend John ar e	\$ 6.59
	01 0 2020	Meals hristo her J. eale , De ositions o Jos	\$ 15.00
	01 0 2020	Meals hristo her J. eale , De ositions o Jos	\$ 31.45
	01 10 2020	Meals hristo her J. eale , De ositions o Jos	\$ 24.41
	0 10 2023	Meals hristo her J. eale , Tra el to asadena	\$ 29.51
	0 10 2023	Meals hristo her J. eale , Tra el to asadena	\$ 30.32
	01 10 2024	Meals hristo her J. eale , S nrise Mediation	\$ 42.92
	01 11 2024	Meals hristo her J. eale , S nrise Mediation	\$ 3 . 2
	05 31 2024	Meals hristo her J. eale , ttend reliminar	\$ 29.21
		tot	\$ 1. 7

ss

Me an arnall meal char e incl ded in
 combined entr or mer ille tri 6 20 23 to
 6 28 2023 06 22 23 \$ 3.15

26 2023	Tra el to erkele Meals	\$	32.46
12 14 2023	n ee 12 5 23 Tra el Meal	\$	29.68
12 21 2023	i h l in oods Tra el to Te as Meal	\$	3.96
	Me an arnall 1 9 24 Tra el to Mediation		
1 26 2024	Meal	\$	11.8
2 21 2024	Meal recei t rom a olombe Dil orth	\$	11.80
2 21 2024	ood recei t rom n Mee	\$	28.68
	ood recei t rom Dela are orth at o is		
	rmstron nternational ir ort enner,		
2 21 2024	0062	\$	15. 5
2 21 2024	ecei t rom Water ront o rmet a e	\$	3.24
	tot	\$	140.59

M r s tt

12 14 2023	ood s lies or December 2023 la er trial re con erence		\$684.46
12 14 2023	ood s lies or December 2023 la er trial re con erence		\$3, 35.00
01 10 2024	Dinner ith mediation team a ter irst da o mediation		\$828.45
01 13 2024	Meal char e or hiladel hia mediation		\$31.92
01 13 2024	Meal char e or hiladel hia mediation		\$64.18
01 13 2024	on erence ooms char es otel or hiladel hia mediation rited do n to \$500		\$3,412.21
	ot		\$,756.

id r

03 15 2020	nch ase elated 2 28 20 De osition o lient at SW o ice Door Dash	\$	28.54
03 15 2020	nch ase elated 2 28 20 De osition o lient at SW o ice Door Dash	\$	28.55

	Snacks e era es ase elated 5 18 20	W	
	hile orkin on ilin or class cert		
09 15 2020	motion Starb cks	\$	10.55
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09 15 2020	motion Starb cks	\$	10.55
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06 30 2023	moot b s a e	\$	210.68
	tot	\$	00.

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	Tra el Meal		\$25. 8
	acer		\$24.50
	tot		\$50.

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TOTAL	\$	9,56 .6
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