

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

RALPH GAMBLES, THOMAS MERCK and ELSIE
COMPO, individually and as representatives
of the Classes,

Plaintiffs,

v.

STERLING INFOSYSTEMS, INC.,

Defendant.

NO. 1:15-cv-09746-PAE

**DECLARATION OF BETH E. TERRELL IN
SUPPORT OF PLAINTIFF'S MOTION FOR
CLASS COUNSEL FEES AND CLASS
REPRESENTATIVE SERVICE PAYMENT**

DEMAND FOR JURY

I, Beth E. Terrell, declare as follows:

A. Qualifications of Lead Attorney

1. I am a member of the law firm of Terrell Marshall Law Group PLLC ("Terrell Marshall"), counsel of record for Plaintiff in this matter. I am admitted to practice before this Court and am a member in good standing of the bars of the states of California and Washington. I respectfully submit this declaration in support of Plaintiff's Motion for Class Counsel Fees and Class Representative Service Payment. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration, and could testify competently to them if called upon to do so.

2. Terrell Marshall is a law firm in Seattle, Washington, that focuses on complex civil and commercial litigation with an emphasis on consumer protection, product defect, civil rights, and wage and hour cases. Terrell Marshall has been appointed lead or co-lead counsel

representing multi-state and nationwide classes in state and federal court in Washington and throughout the United States. Since its founding in 2008, the attorneys at Terrell Marshall have represented scores of classes, tried class actions in state and federal court, and obtained hundreds of millions of dollars in monetary relief to workers, consumers, and other individuals.

3. I am the lead attorney from Terrell Marshall in the instant litigation. I am a founding member of Terrell Marshall. With over twenty years of experience, I concentrate my practice in complex litigation, including the prosecution of consumer protection, defective product, and wage and hour class actions. I have served as co-lead counsel on multi-state, multi-district, and nationwide class actions, resulting in hundreds of millions of dollars in settlements for consumers and workers. I also represent individual employees with wage and hour, workplace exposure, and discrimination claims. I have tried and won cases in state and federal courts and argued before the Washington State Court of Appeals and the Washington State Supreme Court as well as several federal circuit level courts. I am President of the Public Justice Foundation Board of Directors, serve on the Equal Justice Works' Board of Counselors, and am Chair of both the Northwest Consumer Law Center and the Washington Employment Lawyers Association. A member of the State Bar of California and the Washington State Bar Association, I Co-Chair PLI's Consumer Financial Services Institute, and frequently present on a wide variety of topics, including class actions, consumer protection, legal ethics, gender equity, and electronic discovery. I have been repeatedly named a Washington Super Lawyer, including a top 100 Super Lawyer.

B. Other FCRA Cases Litigated by Terrell Marshall

4. Terrell Marshall has litigated the following relevant cases:

- a. *Rosario v. Starbucks*—Filed in 2016 on behalf of job applicants who were affected by Starbucks’ failure to provide notice before taking adverse action. On July 15, 2020, the Northern District of Georgia granted final approval of the settlement which provides class members up to \$8 million in benefits.
- b. *Leo v. Appfolio, Inc.*—Filed in 2017 on behalf of consumers who were affected by Appfolio’s matching procedures that resulted in incorrect information being included on consumer reports and Appfolio’s failure to provide consumers with required information about the sources any inaccuracies. The Western District of Washington granted final approval of the \$4.5 million settlement on July 18, 2019.
- c. *Dougherty v. Barrett Business Services, Inc.*—Filed in 2016 on behalf of job applicants who were affected by BBSI’s failure to provide required disclosures prior to procuring criminal background reports on them. The Clark County Superior Court granted final approval of the \$1.5 million settlement on November 8, 2019.
- d. *Terrell v. Costco Wholesale Corp.*—Filed in 2016 on behalf of applicants and employees who were affected by Costco’s failure to provide required disclosures prior to procuring criminal background reports. The King County Superior Court granted final approval of the \$2.49 million settlement on June 15, 2018.
- e. *Connolly v. Umpqua Bank*—Filed in 2015 on behalf of applicants and employees who were affected by Umpqua’s failure to provide required disclosures prior to procuring criminal background reports and before taking adverse action based on such reports. The Western District of Washington granted final approval of the \$325,000 settlement on February 28, 2019.

C. Other Consumer Protection Cases Litigated by Terrell Marshall

- a. *Abante Rooter & Plumbing, Inc., et al. v. Alarm.com Inc., et al.*—Filed in 2015 on behalf of consumers who received solicitation calls on their cellular and residential telephones

without their prior express consent. The Northern District of California granted final approval of the \$28 million settlement on August 15, 2019.

- b. *Borecki v. Raymours Furniture Co., Inc.*—Filed in 2017 on behalf of consumers who received spam text messages on their cellular telephones without their prior express consent. The Southern District of New York granted final approval of the \$4.25 million settlement on September 10, 2019.
- c. *Snyder v. Ocwen Loan Servicing, LLC*—Filed in 2014 on behalf of consumers who received automated collection calls on their cellular telephones without their prior express consent. The Northern District of Illinois granted final approval of the \$21.5 million settlement on May 14, 2019.
- d. *Melito, et al. v. American Eagle Outfitters, Inc., et al.*—Filed in 2014 on behalf of consumers who received spam text messages on their cellular telephones without their prior express consent. The Southern District of New York granted final approval to the \$14.5 million settlement on September 11, 2017, which the Second Circuit affirmed on April 30, 2019.
- e. *In re Capital One Telephone Consumer Protection Act Litigation*—Filed in 2012 on behalf of consumers who received automated, prerecorded collection calls on their cellular telephones without their prior express consent. Terrell Marshall served as co-lead counsel in the multidistrict litigation. The Northern District of Illinois granted final approval of the \$75 million settlement on February 23, 2015.
- f. *In re Monitronics International, Inc. Telephone Consumer Protection Act Litigation*—Filed in 2011 on behalf consumers who received automated, prerecorded solicitation calls on their residential and telephones without their prior express consent. Terrell Marshall served as co-lead counsel in the multidistrict litigation. The Northern District of West Virginia granted final approval of the \$28 million settlement on June 12, 2018.

- g. *Abante Rooter & Plumbing, Inc. v. Pivotal Payments Inc.*— Filed in 2016 on behalf of consumers that received automated solicitation telephone calls to their cell phones without their prior express consent. The Northern District of California granted final approval of the \$9 million settlement on October 15, 2018.
- h. *Wilkins, et al. v. HSBC Bank Nevada, N.A., et al.*—Filed in 2014 on behalf of individuals who received prerecorded calls using an automatic dialing system without their prior consent. The Northern District of Illinois granted final approval of the \$39.9 million settlement on March 17, 2015.

D. Qualifications of Other Terrell Marshall Attorneys and Staff Members

5. **Adrienne D. McEntee** became a member of Terrell Marshall in 2014. The core of Ms. McEntee’s practice is complex litigation, including the prosecution of class actions on behalf of consumers, actions involving vulnerable adults, trusts and estates, and real estate and commercial disputes. Ms. McEntee has significant trial experience, having successfully tried commercial cases involving claims of breach of fiduciary duty, breach of contract, and breach of easement. Ms. McEntee graduated from the University of Washington School of Law in 2003, where she was a member of the Pacific Rim Law and Policy Journal and Moot Court Honor Board. Prior to joining Terrell Marshall, Ms. McEntee was a member of Tousley Brain Stephens PLLC, where she practiced for five years. Before entering private practice, Ms. McEntee worked with the King County Prosecuting Attorney’s Office, where she prosecuted a broad range of crimes. Ms. McEntee has tried approximately fifty cases and has briefed, argued, and won cases before the Washington State Court of Appeals. Since her admission to the bar, Ms. McEntee has been an active member of the Washington State Bar Association and

Washington Women Lawyers, as a member of the Judicial Evaluation Committee. Ms. McEntee has been named on the Washington Super Lawyers list since 2018.

6. **Erika L. Nusser** joined Terrell Marshall in 2008 and became a member in 2018. Ms. Nusser practices complex litigation, including the prosecution of consumer, wage and hour, and civil rights class actions. She has served as co-lead counsel on numerous multi-state and nationwide class actions. In 2008, Ms. Nusser received her J.D. from the University of San Francisco, School of Law, graduating in the top 25%. Ms. Nusser co-authored the chapter on discovery in the National Consumer Law Center's Class Action Manual. She also co-edited and wrote several chapters of the Consumer Protection Deskbook published by the Washington State Association for Justice. Ms. Nusser is the current co-chair of the interpersonal violence section of the Washington State Association for Justice and has previously served as the co-chair of the employment law section. Ms. Nusser has been repeatedly named to the annual Rising Star List (2013 – 2019) by Washington Super Lawyers.

7. **Ryan Tack-Hooper** has been a member of Terrell Marshall since 2020. He concentrates on class actions to protect employees, consumers, and people whose civil rights have been violated. He has been co-lead counsel in successful litigation across the country in state and federal courts, including cases involving discrimination on the basis of disability, religion, speech, and race. In 2009, Mr. Tack-Hooper received a J.D., cum laude, from New York University School of Law. Prior to joining Terrell Marshall, Mr. Tack-Hooper was the Legal Director of the American Civil Liberties Union of Delaware, where he practiced civil rights law. He has also served as an adjunct professor of law at the University of Pennsylvania Law School,

where he taught legal writing. He was a law clerk to the Honorable Jerome B. Simandle, Chief Judge of the United States District Court for the District of New Jersey.

8. **Elizabeth Adams** has been an associate with Terrell Marshall since 2015. Ms. Adams concentrates her practice in complex litigation, including the prosecution of consumer, wage and hour, and civil rights class actions. In 2012, Ms. Adams received her J.D. from the UCLA School of Law, where she received the Order of the Coif and served as a Comments Editor for the UCLA Law Review. Before joining Terrell Marshall, Ms. Adams served as a law clerk to the Honorable Dean D. Pregerson, the Honorable George Wu, and the Honorable John A. Kronstadt, all of the United States District Court for the Central District of California.

9. **Gregory Smith** was an attorney at Terrell Marshall in 2019. Mr. Smith practiced law for over a decade.

10. **Kaylan Lovrovich** was a law clerk at Terrell Marshall during the Summer and Fall of 2018 and is now an active member of the Washington State Bar Association.

11. **Jennifer Boschen** is a senior paralegal at Terrell Marshall with nearly 20 years of legal experience.

12. **Bradford Kinsey** has been a legal secretary at Terrell Marshall since 2009 and has nearly 30 years of legal experience.

E. Terrell Marshall's Fees

13. The following table identifies the attorneys and staff members from Terrell Marshall who worked on this case and for whom the recovery of fees is sought. For each of the timekeepers below I have stated the current hourly rate, the number of hours worked through July 17, 2020, and the total amount of fees. These time summaries are taken from

contemporaneous, daily time reports prepared and maintained by Terrell Marshall in the regular course of business. The reports, redacted to remove references to work product, are attached here as Exhibit A:

	RATE	HOURS	TOTAL
Beth E. Terrell Partner	\$775	81.4	\$63,085.00
Adrienne D. McEntee Partner	\$700	83.4	\$58,380.00
Erika L. Nusser Partner	\$600	44.1	\$26,460.00
Ryan Tack-Hooper Partner	\$575	71.0	\$40,825.00
Elizabeth Adams Associate	\$425	5.6	\$2,380.00
Gregory Smith Associate	\$425	93.5	\$39,737.50
Kaylan Lovrovich Law Clerk	\$275	21.6	\$5,940.00
Jennifer Boschen Senior Paralegal	\$295	31.8	\$9,381.00
Bradford Kinsey Legal Secretary	\$225	15.1	\$3,397.50
TOTAL		447.5	\$249,586.00

14. Since the beginning of this case, Terrell Marshall has worked with no guarantee of being compensated for its time and efforts. Payment of Terrell Marshall's fees has always been contingent on successfully obtaining relief for the plaintiffs and proposed class members. As a result, there was a substantial risk of nonpayment, particularly in light of the challenges inherent in this type of case. Work on this case has necessarily been to the exclusion of work

on other matters that likely would have generated fees. Terrell Marshall has also been denied use of the fees it earned over the course of this case.

15. I reviewed Terrell Marshall's billing records and reduced or eliminated time that was largely administrative in nature.

16. The lodestar also does not include the work we will do after completion of this motion, which will include working with the settlement administrator, preparing the motion for final approval and attending the hearing, and communicating with class members.

17. The work performed by our law clerk, paralegal, and legal secretary was work that I or attorney would have had to perform absent such assistance. These staff members are qualified to perform substantive legal work based on their training and past experience working for attorneys.

F. Terrell Marshall's Rates Have Been Approved by Courts Around the Country

18. Terrell Marshall's lodestar calculations are based on reasonable hourly rates. Plaintiffs' counsel set their rates for attorneys and staff members based on a variety of factors, including among others: the experience, skill and sophistication required for the types of legal services typically performed; the rates customarily charged in the markets where legal services are typically performed; and the experience, reputation and ability of the attorneys and staff members.

19. Courts around the country have approved fee requests based on Terrell Marshall's standard rates at the time of the application. Here is a sample of the courts that have approved as reasonable Terrell Marshall's hourly rates of up to \$725-\$775 for partners,

\$350-\$500 for associates, \$200-\$350 for law clerks, \$275-\$300 for paralegals, and \$225 for legal secretaries:

- a. July 2020, in *Turner v. ZestFinance, Inc.*, No. 3:19-cv-00293-REP (E.D. Va.);
- b. September 2019, in *Borecki v. Raymours Furniture*, No. 1:17-cv-01188-LAK-SN (S.D.N.Y.);
- c. August 2019, in *Abante Rooter and Plumbing v. Alarm.com*, No. 4:15-cv-06314-YGR (N.D. Cal.); and
- d. September 2017, in *Melito v. American Eagle Outfitters, Inc.*, No. 14-CV-2440 (VEC) (S.D.N.Y.).

20. Terrell Marshall has incurred out-of-pocket litigation expenses totaling \$102,691.55, to cover expenses related to experts, mediation, legal research, filing fees, and administrative costs such as mailing, and courier expenses. The following chart summarizes Terrell Marshall's litigation costs, which are detailed in Exhibit B:

Category of Expense	Total
Computer Research and Pacer Expenses	\$44.36
Courier, Postage, and Reproduction	\$338.34
Experts Costs	\$89,306.34
Filing Fees	\$847.00
Mediation Costs	\$8,920.92
Travel (Airfare, Hotel, Meals, Rides, and Parking)	\$3,234.59
TOTAL	\$102,691.55

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

DATED at Seattle, Washington, this 21st day of July, 2020.

/s/ Beth E. Terrell, Admitted Pro Hac Vice
Beth E. Terrell, Admitted Pro Hac Vice

— EXHIBIT A —

Terrell Marshall Law Group PLLC
Gambles v. Sterling Infosystems, Inc.
Matter 2054-001

Date	Initials	Narrative	Units	Price	Value
Statement Professional: Adrienne McEntee					
9/10/2018	ADM	Reviewed file.	1.3	\$ 700.00	\$ 910.00
9/12/2018	ADM	Call with co-counsel.	0.5	\$ 700.00	\$ 350.00
9/13/2018	ADM	Worked on stipulation to extend deadline to take 30(b)(1) depositions.	0.5	\$ 700.00	\$ 350.00
9/18/2018	ADM	Followed up on stipulation; looked into Daubert issues.	1.7	\$ 700.00	\$ 1,190.00
9/26/2018	ADM	Call from Mr. Seligman regarding expert issues; reviewed materials related to expert work; emailed the same to Mr. Seligman.	0.4	\$ 700.00	\$ 280.00
9/28/2018	ADM	Reviewed emails related to expert work.	0.6	\$ 700.00	\$ 420.00
10/1/2018	ADM	Worked on research issues; call with co-counsel and experts; Left message for Mr. Hashmall; return call from the same; reviewed	2.9	\$ 700.00	\$ 2,030.00
10/9/2018	ADM	draft discovery requests.	0.4	\$ 700.00	\$ 280.00
10/11/2018	ADM	Reviewed research on FCRA issues.	0.3	\$ 700.00	\$ 210.00
10/16/2018	ADM	Reviewed materials in preparation for call with expert; participated in the same.	0.5	\$ 700.00	\$ 350.00
10/26/2018	ADM	Reviewed supplemental discovery responses.	1	\$ 700.00	\$ 700.00
12/10/2018	ADM	Call with co-counsel regarding steps forward.	0.4	\$ 700.00	\$ 280.00
12/14/2018	ADM	Reviewed subpoenas to Walmart and Walmart employee; emails to and from co-counsel regarding the same.	0.5	\$ 700.00	\$ 350.00
12/17/2018	ADM	Worked on subpoena issues.	0.2	\$ 700.00	\$ 140.00
12/18/2018	ADM	Emails to and from co-counsel regarding subpoena service.	0.2	\$ 700.00	\$ 140.00
12/26/2018	ADM	Reviewed letter from co-counsel to opposing counsel.	0.2	\$ 700.00	\$ 140.00
1/4/2019	ADM	Meet and confer call regarding Walmart subpoena	0.3	\$ 700.00	\$ 210.00
1/22/2019	ADM	Call with opposing counsel [.8]; drafted letter to opposing counsel [1.0]	1.8	\$ 700.00	\$ 1,260.00
1/23/2019	ADM	Revised and finalized letter to opposing counsel.	0.4	\$ 700.00	\$ 280.00
1/24/2019	ADM	Emailled potential vendor for TAR proposal; call with the same; emails from the same; reviewed proposal.	0.6	\$ 700.00	\$ 420.00

1/25/2019	ADM	Reviewed letter from opposing counsel; drafted response to the same.	1	\$ 700.00	\$	700.00
1/28/2019	ADM	Revised and finalized letter to opposing counsel; personal conference regarding search terms; call with Mr. Hashmall regarding the same.	1	\$ 700.00	\$	700.00
2/1/2019	ADM	Reviewed search terms; email from potential vendor comparing TAR proposals; reviewed objections to Walmart subpoena.	0.2	\$ 700.00	\$	140.00
2/4/2019	ADM	Reviewed TAR proposals; emailed the same to co-counsel; call with co-counsel regarding the same and search terms.	0.5	\$ 700.00	\$	350.00
2/14/2019	ADM	Reviewed Salesforce search terms; drafted letter to opposing counsel regarding the same [.5]; reviewed our expert report [.5]; reviewed Lexis Nexis deposition [2.0].	3	\$ 700.00	\$	2,100.00
2/15/2019	ADM	Call with co-counsel regarding next steps.	0.9	\$ 700.00	\$	630.00
2/20/2019	ADM	Reviewed changes to [REDACTED]	0.2	\$ 700.00	\$	140.00
2/23/2019	ADM	Reviewed [REDACTED] results.	0.2	\$ 700.00	\$	140.00
2/27/2019	ADM	Participated in Kaleidoscope training; worked on coding.	1.5	\$ 700.00	\$	1,050.00
2/28/2019	ADM	Reviewed Mr. [REDACTED]'s analysis of [REDACTED].	0.2	\$ 700.00	\$	140.00
3/1/2019	ADM	Worked on coding issues.	1	\$ 700.00	\$	700.00
3/4/2019	ADM	Email from co-counsel regarding coding; emailed Ms. Drake regarding the same; worked on search terms issues.	0.5	\$ 700.00	\$	350.00
3/5/2019	ADM	Emails to and from opposing counsel regarding search terms.	0.2	\$ 700.00	\$	140.00
3/6/2019	ADM	Reviewed email from opposing counsel regarding search terms; participated in call with the same; call with Michelle Drake.	1	\$ 700.00	\$	700.00
3/7/2019	ADM	Reviewed revised search terms. Drafted letter to opposing counsel regarding search terms.	1.2	\$ 700.00	\$	840.00
3/11/2019	ADM	Letter from opposing counsel regarding search terms; reviewed deposition of Aaron Sherber.	1.4	\$ 700.00	\$	980.00
3/16/2019	ADM	Emails to and from co-counsel regarding meeting; reviewed letters to opposing counsel and counsel for WalMart.	0.2	\$ 700.00	\$	140.00
3/22/2019	ADM	Call with opposing counsel [.9]; call with co-counsel [1.0];	1.9	\$ 700.00	\$	1,330.00
3/23/2019	ADM	Reviewed correspondence regarding discovery and search terms; started letter to opposing regarding the same.	0.8	\$ 700.00	\$	560.00

3/25/2019	ADM	Reviewed rough draft of Larisa Ivy deposition [.8]; call with co-counsel [.5]; reviewed discovery responses [.8]; worked on letter to opposing counsel regarding search terms and discovery [1.0]; Worked on letter to opposing counsel regarding search terms [2.0];	3.1	\$ 700.00	\$	2,170.00
3/26/2019	ADM	worked on discovery responses [1.0].	3	\$ 700.00	\$	2,100.00
3/27/2019	ADM	Revised and finalized letter regarding search terms. Worked on discovery responses; call with co-counsel regarding the	0.2	\$ 700.00	\$	140.00
3/29/2019	ADM	same.	6.8	\$ 700.00	\$	4,760.00
3/30/2019	ADM	Worked on responses to requests for production. Researched [REDACTED]	4.1	\$ 700.00	\$	2,870.00
4/1/2019	ADM	[REDACTED].	0.1	\$ 700.00	\$	70.00
4/2/2019	ADM	Reviewed revisions to discovery responses; call with opposing counsel regarding discovery deadlines.	0.9	\$ 700.00	\$	630.00
4/24/2019	ADM	Worked on confidentiality designation issues pertaining to WalMart. Worked on letter to counsel for WalMart regarding confidentiality	2.2	\$ 700.00	\$	1,540.00
4/25/2019	ADM	designations. Revised letter to WalMart counsel; emails to and from co-counsel	1	\$ 700.00	\$	700.00
4/26/2019	ADM	regarding the same.	0.7	\$ 700.00	\$	490.00
5/17/2019	ADM	Call with counsel for WalMart regarding confidentiality issues.	0.7	\$ 700.00	\$	490.00
5/22/2019	ADM	Email from David Sellinger, counsel for WalMart, regarding WalMart confidentiality designations; emailed co-counsel regarding the same.	0.2	\$ 700.00	\$	140.00
5/23/2019	ADM	Emails to and from co-counsel regarding status of confidentiality designation discussions with counsel for WalMart. Emailed Mr. Seligman regarding status of WalMart's response to our	0.2	\$ 700.00	\$	140.00
5/30/2019	ADM	April letter challenging confidentiality designations.	0.2	\$ 700.00	\$	140.00
6/5/2019	ADM	Reviewed mediation statements.	0.3	\$ 700.00	\$	210.00
6/11/2019	ADM	Researched [REDACTED]s.	0.1	\$ 700.00	\$	70.00
6/13/2019	ADM	Reviewed memo regarding [REDACTED]; drafted declaration [REDACTED].	1	\$ 700.00	\$	700.00
6/18/2019	ADM	Reviewed redlines to proposed [REDACTED] declaration.	0.2	\$ 700.00	\$	140.00

6/19/2019	ADM	Call with co-counsel.	0.9	\$ 700.00	\$	630.00
6/25/2019	ADM	Worked on [REDACTED] declaration.	0.5	\$ 700.00	\$	350.00
6/27/2019	ADM	Personal conference with Greg regarding document review.	0.3	\$ 700.00	\$	210.00
7/9/2019	ADM	Call with co-counsel regarding [REDACTED].	0.5	\$ 700.00	\$	350.00
7/10/2019	ADM	Emails to and from Greg regarding document review.	0.2	\$ 700.00	\$	140.00
7/16/2019	ADM	Reviewed hot document from Sterling production.	0.2	\$ 700.00	\$	140.00
7/17/2019	ADM	Worked on expert issues; reviewed [REDACTED] report.	1.6	\$ 700.00	\$	1,120.00
7/18/2019	ADM	Worked on expert issues; call with [REDACTED];	0.7	\$ 700.00	\$	490.00
8/6/2019	ADM	Drafted email to [REDACTED] regarding expert issues.	1.1	\$ 700.00	\$	770.00
8/12/2019	ADM	Reviewed memo regarding document production.	0.2	\$ 700.00	\$	140.00
8/14/2019	ADM	Emails to and from [REDACTED] regarding potential experts. Reviewed article by [REDACTED]; left her a voice message regarding the same; return call from the same; reviewed bio for [REDACTED]	0.2	\$ 700.00	\$	140.00
8/15/2019	ADM	Researched background of [REDACTED]; emailed regarding potential expert testimony; researched background of [REDACTED]	2	\$ 700.00	\$	1,400.00
8/19/2019	ADM	[REDACTED]; emailed regarding potential expert testimony.	1.1	\$ 700.00	\$	770.00
8/20/2019	ADM	Call with [REDACTED]; emailed the same.	0.4	\$ 700.00	\$	280.00
8/22/2019	ADM	Call regarding experts.	0.2	\$ 700.00	\$	140.00
8/23/2019	ADM	Worked on expert issues regarding [REDACTED].	0.5	\$ 700.00	\$	350.00
8/26/2019	ADM	Worked on mediation letter; emails to and from [REDACTED]	3.7	\$ 700.00	\$	2,590.00
8/28/2019	ADM	Reviewed final mediation letter.	0.2	\$ 700.00	\$	140.00
9/20/2019	ADM	Reviewed and revised [REDACTED].	0.3	\$ 700.00	\$	210.00
9/24/2019	ADM	Call with potential expert on [REDACTED].	0.4	\$ 700.00	\$	280.00
11/25/2019	ADM	Reviewed CFPB consent order. Reviewed emails by and between co-counsel regarding discovery	0.2	\$ 700.00	\$	140.00
12/10/2019	ADM	issues, mediation, and expert reports.	0.2	\$ 700.00	\$	140.00
12/17/2019	ADM	Reviewed term sheet.	0.1	\$ 700.00	\$	70.00
12/18/2019	ADM	Analyzed joint prosecution agreement. Reviewed Sterling materials; personal conference with Ryan regarding	0.2	\$ 700.00	\$	140.00
1/6/2020	ADM	the same.	0.7	\$ 700.00	\$	490.00
1/7/2020	ADM	Personal conference regarding settlement agreement.	0.3	\$ 700.00	\$	210.00

1/8/2020	ADM	Reviewed and revised settlement agreement.	0.7	\$ 700.00	\$	490.00
1/9/2020	ADM	Reviewed and revised notice documents.	0.3	\$ 700.00	\$	210.00
3/25/2020	ADM	Revised my bio as part of the adequacy declaration.	0.2	\$ 700.00	\$	140.00
5/29/2020	ADM	Reviewed order on preliminary approval.	0.2	\$ 700.00	\$	140.00
6/15/2020	ADM	Emails regarding calls from class members.	0.2	\$ 700.00	\$	140.00
6/16/2020	ADM	Internal emails regarding class member calls [REDACTED].	0.2	\$ 700.00	\$	140.00
7/15/2020	ADM	Call regarding Sterling fee petition; worked on the same.	0.7	\$ 700.00	\$	490.00
7/16/2020	ADM	Worked on fee petition.	6	\$ 700.00	\$	4,200.00
7/17/2020	ADM	Continued work on Gambles fee petition and supporting declaration.	1.4	\$ 700.00	\$	980.00
			83.4		\$	58,380.00

Statement Professional: Beth Terrell

12/17/2019	BET	Prepared for and attended mediation with Nancy Lesser.	8.2	\$ 775.00	\$	6,355.00
12/16/2019	BET	Travel to New York City for mediation; prepared for mediation.	6.8	\$ 775.00	\$	5,270.00
6/9/2019	BET	Travel from Nashville to New York City for mediation; prepared for mediation.	4.2	\$ 775.00	\$	3,255.00
6/10/2019	BET	Prepared for and attended mediation; dinner with co-counsel.	8.2	\$ 775.00	\$	6,355.00
6/11/2019	BET	Return travel form mediation.	6.2	\$ 775.00	\$	4,805.00
		Travel to New York City and [REDACTED];				
8/27/2019	BET	return travel to Washington, D.C.	15.2	\$ 775.00	\$	11,780.00
		Prepared for and attended telephone conference with co-counsel regarding next steps.				
9/12/2018	BET		0.6	\$ 775.00	\$	465.00
9/28/2018	BET	Telephone conference regarding expert issues; prepared for same.	0.8	\$ 775.00	\$	620.00
		Prepared for and attended telephone conference regarding expert report and other expert issues.				
11/4/2018	BET		0.8	\$ 775.00	\$	620.00
		Attended telephonic meet and confer with Wal-Mart reagrding subpoenas; analyzed next steps regarding same.				
1/4/2019	BET		0.6	\$ 775.00	\$	465.00
		Prepared for and attended telephonic meet and confer with opposing counsel; analyzed next steps regarding same.				
1/22/2019	BET		0.9	\$ 775.00	\$	697.50
2/15/2019	BET	Telephone conference with co-counsel regarding next steps.	0.9	\$ 775.00	\$	697.50

3/22/2019	BET	Telephone conference with opposing counsel; follow-up call with co-counsel.	1.6	\$ 775.00	\$	1,240.00
4/9/2019	BET	Telephone conference with co-counsel.	0.7	\$ 775.00	\$	542.50
6/19/2019	BET	Telephone conference with co-counsel.	0.8	\$ 775.00	\$	620.00
7/17/2019	BET	Prepared for and attended pre-mediation call with Nancy Lesser.	0.9	\$ 775.00	\$	697.50
8/13/2019	BET	Telephone conference regarding mediation and expert issues.	0.8	\$ 775.00	\$	620.00
12/10/2019	BET	Telephone conference with opposing counsel; worked on [REDACTED]	1.4	\$ 775.00	\$	1,085.00
2/21/2020	BET	Worked on adequacy declaration.	0.8	\$ 775.00	\$	620.00
1/7/2020	BET	Worked on settlement agreement; emails regarding same.	0.6	\$ 775.00	\$	465.00
1/8/2020	BET	Worked on settlement agreement.	0.7	\$ 775.00	\$	542.50
9/24/2019	BET	Prepared for and attended telephone conference with potential expert; emails with co-counsel regarding same.	1.9	\$ 775.00	\$	1,472.50
9/20/2019	BET	Worked on expert [REDACTED].	0.3	\$ 775.00	\$	232.50
9/21/2019	BET	Worked on expert issues.	0.8	\$ 775.00	\$	620.00
10/3/2019	BET	Worked on expert issues; telephone conference with [REDACTED] regarding same; emails with co-counsel about expert issues.	1.2	\$ 775.00	\$	930.00
10/4/2019	BET	Telephone conference with co-counsel and [REDACTED]. Researched potential experts addressing [REDACTED]	0.8	\$ 775.00	\$	620.00
9/19/2019	BET	[REDACTED]	1.8	\$ 775.00	\$	1,395.00
9/25/2019	BET	Telephone conference with [REDACTED].	0.7	\$ 775.00	\$	542.50
10/7/2019	BET	Worked on expert issues.	0.8	\$ 775.00	\$	620.00
10/9/2019	BET	Worked on expert issues [REDACTED].	1.2	\$ 775.00	\$	930.00
11/10/2019	BET	Worked on expert [REDACTED].	0.6	\$ 775.00	\$	465.00
11/25/2019	BET	Worked on expert issues; [REDACTED]; emails with co-counsel regarding same.	1.2	\$ 775.00	\$	930.00
11/26/2019	BET	Worked on expert issues.	0.6	\$ 775.00	\$	465.00
12/7/2019	BET	Worked on expert issues.	0.7	\$ 775.00	\$	542.50
12/12/2019	BET	Worked on expert [REDACTED].	0.5	\$ 775.00	\$	387.50
12/13/2019	BET	Worked on expert [REDACTED].	0.5	\$ 775.00	\$	387.50
2/1/2020	BET	Worked on settlement approval papers.	0.9	\$ 775.00	\$	697.50

7/26/2019	BET	Reviewed [REDACTED]; emails with co-counsel regarding same; worked on scheduling call with [REDACTED].	1.2	\$ 775.00	\$	930.00
8/6/2019	BET	Prepared for and attended telephone conference with [REDACTED] regarding expert issues.	0.8	\$ 775.00	\$	620.00
8/29/2019	BET	Emails with co-counsel regarding mediation and evidence supporting mediation statement.	0.7	\$ 775.00	\$	542.50
3/18/2020	BET	Emails regarding claims administration issues.	0.4	\$ 775.00	\$	310.00
7/15/2019	BET	Worked on [REDACTED] issues.	0.6	\$ 775.00	\$	465.00
7/3/2019	BET	Worked on [REDACTED].	0.8	\$ 775.00	\$	620.00
8/14/2019	BET	Worked on expert issues.	0.4	\$ 775.00	\$	310.00
4/2/2020	BET	Worked on approval papers.	0.3	\$ 775.00	\$	232.50
			81.4		\$	63,085.00

Statement Professional: Bradford Kinsey

9/13/2018	BKK	Prepared master caption and certificate of service; prepared draft of stipulation and proposed order extending 30(b)(1) depositions deadline.	0.7	\$ 225.00	\$	157.50
9/18/2018	BKK	Prepared draft of stipulation and proposed order extending Rule 30(b)(1) deposition deadlines.	0.3	\$ 225.00	\$	67.50
10/23/2018	BKK	Reviewed docket; amended master caption and contacts.	0.3	\$ 225.00	\$	67.50
12/14/2018	BKK	Reviewed WalMart subpoena to produce documents; arranged service of process.	0.5	\$ 225.00	\$	112.50
12/17/2018	BKK	Prepared notice of intent to serve WalMart subpoena; arranged service by email; prepared draft of Ivy subpoena package and notice of intent to serve; arranged service by email; arranged service of process.	0.5	\$ 225.00	\$	112.50
1/22/2019	BKK	Prepared draft of meet and confer letter to opposing counsel.	0.2	\$ 225.00	\$	45.00
1/23/2019	BKK	Reviewed, revised and finalized follow-up meet and confer letter to opposing counsel; arranged delivery to counsel by email.	0.5	\$ 225.00	\$	112.50
1/25/2019	BKK	Drafted meet and confer letter to opposing counsel.	0.2	\$ 225.00	\$	45.00
1/28/2019	BKK	Reviewed, revised and finalized letter to opposing counsel regarding discovery issues; arranged delivery by email.	0.2	\$ 225.00	\$	45.00
3/5/2019	BKK	Arranged conference call.	0.1	\$ 225.00	\$	22.50

3/6/2019 BKK	Prepared draft and finalized letter to Supreme Court requesting McEntee certificate of good standing; reviewed local rules and practice procedures; prepared drafts of McEntee pro hac vice motion, affidavit and proposed order.	1.4	\$	225.00	\$	315.00
3/7/2019 BKK	Reviewed, revised and finalized letter to opposing counsel transmitting revised search terms; arranged delivery to counsel by email.	0.5	\$	225.00	\$	112.50
3/15/2019 BKK	Reviewed, revised and finalized McEntee pro hac vice motion, supporting affidavit and proposed order; arranged filing and service.	0.6	\$	225.00	\$	135.00
3/19/2019 BKK	Prepared draft of McEntee notice of appearance; arranged filing and service.	0.2	\$	225.00	\$	45.00
3/25/2019 BKK	Prepared drafts of answers and responses to Compo and Gambles interrogatories, requests for admission, and requests for production.	4.1	\$	225.00	\$	922.50
3/26/2019 BKK	Prepared drafts of Plaintiff Merc's answers and responses to Defendant's first sets of interrogatories, requests for admission and requests for production.	1.1	\$	225.00	\$	247.50
3/27/2019 BKK	Reviewed, revised and finalized letter to opposing counsel; email correspondence to counsel transmitting same.	0.2	\$	225.00	\$	45.00
4/15/2019 BKK	Reviewed Seligman pro hac vice order; amended master caption; added to contacts.	0.2	\$	225.00	\$	45.00
4/24/2019 BKK	Prepared draft of letter to Sellinger regarding Walmart subpoena. Reviewed, revised and finalized letter regarding Walmart confidentiality designations to Mr. Sellinger; arranged delivery to	0.2	\$	225.00	\$	45.00
4/26/2019 BKK	counsel by email.	0.2	\$	225.00	\$	45.00
6/4/2019 BKK	Reviewed and revised mediation statement.	0.3	\$	225.00	\$	67.50
6/7/2019 BKK	Prepared draft o [REDACTED]	0.2	\$	225.00	\$	45.00
8/23/2019 BKK	Prepared [REDACTED]	0.3	\$	225.00	\$	67.50
8/26/2019 BKK	Prepared [REDACTED]	0.1	\$	225.00	\$	22.50
9/19/2019 BKK	Prepared [REDACTED]	0.2	\$	225.00	\$	45.00
10/3/2019 BKK	Prepared [REDACTED] [.4]; transmitted documents by email to [REDACTED] [.1].	0.5	\$	225.00	\$	112.50

1/6/2020	BKK	Prepared draft of settlement agreement [.4]; prepared draft of motion for final approval [.2].	0.6	\$ 225.00	\$	135.00
2/21/2020	BKK	Reviewed and revised Terrell declaration in support of motion for preliminary approval.	0.4	\$ 225.00	\$	90.00
7/17/2020	BKK	Class member communications and logged notes into spreadsheet.[.5]	0.3	\$ 225.00	\$	67.50
			15.1		\$	3,397.50

Statment Professional: Elizabeth Adams

6/24/2019	EAA	Personal conference regarding research of impact of In re Payment Cards [0.2]; worked on research regarding same [5.4].	5.6	\$ 425.00	\$	2,380.00
			5.6		\$	2,380.00

Statement Professional: Erika Nusser

2/10/2017	ELN	Telephone conference regarding factual and legal issues [.5].	0.5	\$ 600.00	\$	300.00
3/6/2017	ELN	Analyzed fee agreement, and emails regarding the same and case strategy issues [.4].	0.4	\$ 600.00	\$	240.00
3/24/2017	ELN	Analyzed joint prosecution agreement and emails regarding the same [.3].	0.3	\$ 600.00	\$	180.00
2/23/2017	ELN	Emails regarding retainer and analyzed the same [.3].	0.3	\$ 600.00	\$	180.00
2/16/2017	ELN	Telephone conference regarding case strategy issues [1].	1	\$ 600.00	\$	600.00
2/14/2017	ELN	Finalized joint prosecution agreement [.2].	0.2	\$ 600.00	\$	120.00
2/7/2017	ELN	Worked on joint prosecution agreement [.8].	0.8	\$ 600.00	\$	480.00
5/19/2017	ELN	Worked on revisions to discovery requests [.8].	0.8	\$ 600.00	\$	480.00
6/16/2017	ELN	Analyzed and revised initial disclosures [.3].	0.3	\$ 600.00	\$	180.00
7/14/2017	ELN	Emails regarding research on [REDACTED] [.2].	0.2	\$ 600.00	\$	120.00
7/13/2017	ELN	Emails regarding research on [REDACTED] [.2].	0.2	\$ 600.00	\$	120.00
7/7/2017	ELN	Emails and conference regarding factual research [.3].	0.3	\$ 600.00	\$	180.00
7/19/2017	ELN	Telephone conference regarding case strategy issues [.5].	0.5	\$ 600.00	\$	300.00
7/18/2017	ELN	Analyzed and revised memo regarding research of [REDACTED] [REDACTED] [.2].	0.2	\$ 600.00	\$	120.00
9/12/2017	ELN	Analyzed Defendant's discovery responses and emails regarding the same [.5].	0.5	\$ 600.00	\$	300.00
8/22/2017	ELN	Worked on letter summarizing meet and confer conference [.3].	0.3	\$ 600.00	\$	180.00

8/3/2017	ELN	Emails and memo regarding discovery issues and [REDACTED] [.3].	0.3	\$ 600.00	\$	180.00
9/20/2017	ELN	Telephone conference with opposing counsel regarding Defendant's discovery responses and production [1].	1	\$ 600.00	\$	600.00
5/12/2017	ELN	Analyzed case management plan and telephone conference regarding the same [.5].	0.5	\$ 600.00	\$	300.00
5/3/2017	ELN	Discovery conference [1.3].	1.3	\$ 600.00	\$	780.00
4/25/2017	ELN	[REDACTED] and emails regarding strategy relating to the same [.2]; worked on revisions to [REDACTED] [.2].	0.4	\$ 600.00	\$	240.00
3/30/2017	ELN	Analyzed amended complaint and emails regarding the same [.8].	0.8	\$ 600.00	\$	480.00
1/23/2017	ELN	Emails regarding factual background and legal issues and potential claims [.5].	0.5	\$ 600.00	\$	300.00
11/20/2017	ELN	Telephone conference with Mr. O'Neil regarding data production and case status report [.7]; telephone conference with co-counsel regarding the same and case strategy issues [.3]; worked on joint status report [4.3].	5.3	\$ 600.00	\$	3,180.00
11/21/2017	ELN	Worked on revisions to proposed joint status report and emails regarding the same [.6].	0.6	\$ 600.00	\$	360.00
2/9/2018	ELN	Letter regarding data [.2].	0.2	\$ 600.00	\$	120.00
9/12/2018	ELN	Telephone conference regarding discovery and case strategy issues [.5].	0.5	\$ 600.00	\$	300.00
9/28/2018	ELN	Telephone conference regarding expert analysis and discovery issues [.5].	0.5	\$ 600.00	\$	300.00
10/1/2018	ELN	Telephone conference with [REDACTED] [.7].	0.7	\$ 600.00	\$	420.00
10/17/2018	ELN	Continued research regarding [REDACTED] [3].	3	\$ 600.00	\$	1,800.00
10/16/2018	ELN	Continued research regarding [REDACTED] [5].	5	\$ 600.00	\$	3,000.00
10/10/2018	ELN	Continued research regarding [REDACTED] [3.5].	3.5	\$ 600.00	\$	2,100.00
10/22/2018	ELN	Conference regarding research [REDACTED] [.2].	0.2	\$ 600.00	\$	120.00

	Conferences regarding case status and research regarding [REDACTED]				
10/29/2018	ELN [REDACTED] [.4].	0.4	\$ 600.00	\$	240.00
11/5/2018	ELN Worked on expert report [4.6].	4.6	\$ 600.00	\$	2,760.00
	Telephone conference with [REDACTED] regarding expert report and				
11/4/2018	ELN worked on the same [2.3].	2.3	\$ 600.00	\$	1,380.00
11/2/2018	ELN Worked on expert report and emails regarding the same [2.5]	2.5	\$ 600.00	\$	1,500.00
12/10/2018	ELN Telephone conference regarding case strategy issues [.7].	0.7	\$ 600.00	\$	420.00
12/26/2018	ELN Correspondence regarding discovery issues [.5].	0.5	\$ 600.00	\$	300.00
	Telephone conference and conferences regarding document review				
2/27/2019	ELN [1.2].	1.2	\$ 600.00	\$	720.00
2/11/2020	ELN Worked on case descriptions for adequacy declaration [.5].	0.5	\$ 600.00	\$	300.00
	Worked on revisions to declaration in support of motion for				
3/25/2020	ELN preliminary approval [.3].	0.3	\$ 600.00	\$	180.00
		44.1		\$	26,460.00

Statement Professional: Gregory Smith

Gamble v. Sterling: Review pleadings and correspondence. Discussion re: case w/ Adrienne. [7.5]

Corresp w/ Sandy McCollum, Joe Hashmall.

6/27/2019	GS Document Review.	7.5	\$ 425.00	\$	3,187.50
6/28/2019	GS Document review in Kaleidoscop [8]	8	\$ 425.00	\$	3,400.00
7/1/2019	GS Review documents in Kaleidoscope [8]	8	\$ 425.00	\$	3,400.00
7/2/2019	GS Review documents in Kaleidoscope [8]	8	\$ 425.00	\$	3,400.00
7/3/2019	GS Review documents in Kaleidoscope. [8]	8	\$ 425.00	\$	3,400.00
7/8/2019	GS Review documents in Kaleidoscope [8]	8	\$ 425.00	\$	3,400.00
7/9/2019	GS Review documents in Kaleidoscope [7.5]	7.5	\$ 425.00	\$	3,187.50
7/11/2019	GS Document Review in Kaleidoscope [8]	8	\$ 425.00	\$	3,400.00
7/10/2019	GS Document review in Kaleidoscope [8]	8	\$ 425.00	\$	3,400.00
7/12/2019	GS Document review in Kaleidoscope [8]	8	\$ 425.00	\$	3,400.00
7/15/2019	GS Review documents in Kaleidoscope [8]	8	\$ 425.00	\$	3,400.00
7/16/2019	GS Review documents in Kaleidoscope [6.5]	6.5	\$ 425.00	\$	2,762.50
		93.5		\$	39,737.50

Statement Professional: Jennifer Boschen

10/22/2018	JJB	Updated production log; reviewed production history; filed discovery correspondence and responses; processed defendant's production and loaded into case document database.	1	\$ 295.00	\$	295.00
11/28/2018	JJB	Processed third party production; updated production log; loaded production into case document database.	0.5	\$ 295.00	\$	147.50
12/20/2018	JJB	Attempted to download defendant's production; correspondence regarding same.	0.1	\$ 295.00	\$	29.50
12/21/2018	JJB	Attempted to download defendant's production.	0.1	\$ 295.00	\$	29.50
1/8/2019	JJB	Correspondence with opposing counsel regarding access to their production Sharefile account; updated production log; filed and loaded third party production from Lexis Nexis; processed and loaded defendant's production into case document database.	0.6	\$ 295.00	\$	177.00
1/15/2019	JJB	Reviewed discovery correspondence and download history; correspondence regarding exhibits to expert report; downloaded exhibits to expert report.	0.2	\$ 295.00	\$	59.00
1/16/2019	JJB	Downloaded and filed exhibits to expert report.	0.2	\$ 295.00	\$	59.00
1/22/2019	JJB	Processed and logged third party production in response to subpoena; uploaded third party production to case document database.	0.2	\$ 295.00	\$	59.00
1/22/2019	JJB	Researched local ESI vendors who support TAR; correspondence with vendor regarding same; personal conference regarding same.	0.8	\$ 295.00	\$	236.00
1/24/2019	JJB	Reviewed ESI proposal [.1]; telephone conference with vendor regarding ESI proposal [.2].	0.3	\$ 295.00	\$	88.50
1/28/2019	JJB	Prepared for call.	0.1	\$ 295.00	\$	29.50
1/28/2019	JJB	Telephone conference regarding ESI search terms; reviewed case documents.	1.4	\$ 295.00	\$	413.00
1/30/2019	JJB	Worked on ESI search terms.	2	\$ 295.00	\$	590.00
1/31/2019	JJB	Worked on ESI search terms; reviewed case documents.	4.3	\$ 295.00	\$	1,268.50
2/4/2019	JJB	Reviewed correspondence regarding TAR estimates for ESI; reviewed revised ESI search terms; telephone conference regarding same.	3.8	\$ 295.00	\$	1,121.00

2/14/2019	JJB	Reviewed proposed database fields for export by defendant; personal conference regarding same.	0.6	\$ 295.00	\$	177.00
2/27/2019	JJB	Document review platform training.	1.2	\$ 295.00	\$	354.00
3/4/2019	JJB	Worked on revising ESI search terms; worked on scheduling search term telephone conference.	3.2	\$ 295.00	\$	944.00
3/5/2019	JJB	Personal conference and correspondence regarding search terms.	0.1	\$ 295.00	\$	29.50
3/6/2019	JJB	Prepared for conference call with opposing counsel; revised ESI search terms.	1.8	\$ 295.00	\$	531.00
3/6/2019	JJB	Revised ESI search terms.	1.8	\$ 295.00	\$	531.00
3/8/2019	JJB	Reviewed deposition notices and subpoenas; personal conferences and correspondence regarding same.	0.2	\$ 295.00	\$	59.00
3/18/2019	JJB	Loaded third party production into case document database; updated production log.	0.2	\$ 295.00	\$	59.00
4/16/2019	JJB	Processed and loaded plaintiff's production; updated production log.	0.3	\$ 295.00	\$	88.50
4/17/2019	JJB	Worked on downloading and processing defendant's production; updated production log.	0.5	\$ 295.00	\$	147.50
4/18/2019	JJB	Personal conferences regarding case correspondence.	0.2	\$ 295.00	\$	59.00
5/3/2019	JJB	Loaded defendant's production into case document database; reviewed production history; correspondence regarding same.	0.4	\$ 295.00	\$	118.00
5/3/2019	JJB	Worked on processing defendant and third party productions.	0.3	\$ 295.00	\$	88.50
5/7/2019	JJB	Updated production log; correspondence regarding production status.	0.1	\$ 295.00	\$	29.50
5/8/2019	JJB	Reviewed production history.	0.1	\$ 295.00	\$	29.50
5/20/2019	JJB	Correspondence regarding discovery responses and defendant's production.	0.1	\$ 295.00	\$	29.50
5/21/2019	JJB	Loaded defendant's production into case document database.	0.2	\$ 295.00	\$	59.00
6/3/2019	JJB	Downloaded defendant's production; updated production log; imported defendant's production into case document database.	0.6	\$ 295.00	\$	177.00
6/7/2019	JJB	Downloaded defendant's production.	0.1	\$ 295.00	\$	29.50
6/10/2019	JJB	Loaded defendant's production.	0.2	\$ 295.00	\$	59.00
6/17/2019	JJB	Reviewed discovery correspondence; worked on filing.	0.3	\$ 295.00	\$	88.50

8/20/2019	JJB	Worked on loading defendant's production into case document database.	0.4	\$ 295.00	\$	118.00
12/5/2019	JJB	Downloaded and processed defendant's production; updated production log; correspondence with opposing counsel regarding protected file.	0.5	\$ 295.00	\$	147.50
1/21/2020	JJB	Reviewed discovery and motion history in preparation for motion for preliminary approval; drafted summary of same.	1.2	\$ 295.00	\$	354.00
6/15/2020	JJB	Reviewed case documents in preparation for responding to case inquiry	0.3	\$ 295.00	\$	88.50
6/16/2020	JJB	Worked on class inquiry management; correspondence regarding same; reviewed class notice; reviewed preliminary approval motion and supporting documents; correspondence regarding same.	0.7	\$ 295.00	\$	206.50
6/16/2020	JJB	Telephone calls and emails to class members responding to notice inquiries; correspondence with claims administrator regarding same.	0.6	\$ 295.00	\$	177.00
			31.8		\$	9,381.00
Statement Professional: Kaylan Lovrovich						
10/1/2018	KL	Met with Ms. McEntee regarding research project [.1]; worked on FCRA research [3.9].	4	\$ 275.00	\$	1,100.00
10/8/2018	KL	Email correspondence with Ms. Nusser regarding FCRA research [.2]; worked on FCRA research [.4].	0.6	\$ 275.00	\$	165.00
10/12/2018	KL	Met with Ms. McEntee regarding FCRA research [.1]; email correspondence with Ms. Nusser regarding FCRA research [.1]; worked on FCRA research [4.8].	5	\$ 275.00	\$	1,375.00
10/15/2018	KL	Worked on FCRA research [redacted] [2.5].	2.5	\$ 275.00	\$	687.50
10/19/2018	KL	Worked on FCRA research [3.8]; email correspondence with Ms. Nusser regarding FCRA research [.2].	4	\$ 275.00	\$	1,100.00
10/22/2018	KL	Worked on FCRA research [.5].	0.5	\$ 275.00	\$	137.50
10/26/2018	KL	Met with Ms. McEntee regarding FCRA research [.2]; email correspondence with Ms. McEntee regarding FCRA research [.1].	0.3	\$ 275.00	\$	82.50
10/29/2018	KL	Worked on FCRA research [redacted] [.7].	0.7	\$ 275.00	\$	192.50
11/2/2018	KL	Worked on FCRA research [3].	3	\$ 275.00	\$	825.00

11/5/2018	KL	Worked on FCRA research [1].	1	\$ 275.00	\$	275.00
			21.6		\$	5,940.00

Statement Professional: Ryan Tack-Hooper

1/6/2020	RT	Meeting regarding case and status of settlement agreement [.2] Reviewed case documents in preparation for drafting agreement [1]	1.2	\$ 575.00	\$	690.00
1/7/2020	RT	Completed first draft of settlement agreement with questions for co-counsel [4.2] Finalized first draft of settlement agreement for review [1.8]; revised settlement agreement based on co-counsel review and feedback [1.1]; review and analysis of proposed notice exhibits from prior cases in preparation for drafting of proposed notice exhibits [.7] Email to plaintiff attorney group identifying outstanding issues with settlement agreement [.2]	4.2	\$ 575.00	\$	2,415.00
1/8/2020	RT	Completed drafts of long-form and postcard notice for settlement agreement [2.2]	3.8	\$ 575.00	\$	2,185.00
1/9/2020	RT	Revised draft settlement agreement, including exhibits, to finalize and reflect all edits of co-counsel [1]; research into 2d cir. precedent on results of objection [.4]; email to co-counsel [.1]; email to opposing counsel enclosing draft agreement [.1];	2.2	\$ 575.00	\$	1,265.00
1/17/2020	RT	Review of draft individual settlement agreements [.8]; email to co-counsel about draft settlements [.1]	1.6	\$ 575.00	\$	920.00
1/16/2020	RT	Email to co-counsel on status of draft settlement [.1]	0.9	\$ 575.00	\$	517.50
1/15/2020	RT		0.1	\$ 575.00	\$	57.50
1/27/2020	RT	Drafted section of preliminary approval motion concerning adequacy of notice procedures [1.5]; revised preliminary approval motion for errors, inconsistencies, unclear language, etc. [2.5]	4	\$ 575.00	\$	2,300.00
1/24/2020	RT	Research into authority for need to certify class at time of preliminary approval [1.8]; drafted section of preliminary approval motion concerning certification of settlement class under 23(a) factors [2.5]; drafted section of preliminary approval motion concerning certification of settlement class under 23(b) factors [2.8]	7.1	\$ 575.00	\$	4,082.50

1/23/2020 RT	Review and analysis of Defendant's mediation briefs for incorporation into risks of litigation section of preliminary approval motion [1.1]; drafted section of preliminary approval motion concerning risks of litigation [2.2]; cite-checked authorities in draft preliminary approval motion [2.5]	5.8	\$ 575.00	\$	3,335.00
1/22/2020 RT	Finalized and sent to opposing counsel draft individual settlements [.3]; drafted first argument section for preliminary approval motion [2.8]; drafted section of preliminary approval motion concerning analysis of size of recovery [1.9]	5	\$ 575.00	\$	2,875.00
1/21/2020 RT	Reviewed SDNY local rules for preliminary approval motion [.6]; email to co-counsel concerning notice provisions [.2]; prepared questions and instructions for paralegal to help with preparation of motion for preliminary approval [.4]; researched current legal standards for second circuit preliminary approval of class settlement [1.6]; review of procedural and discovery history for preliminary approval motion [1.2]; drafted fact section for preliminary approval motion [2.5]; email with co-counsel about status of individual settlements [.1]	6.6	\$ 575.00	\$	3,795.00
1/14/2020 RT	Review and analysis of case background in preparation for court approval process [1.8]	1.8	\$ 575.00	\$	1,035.00
2/3/2020 RT	Call with opposing counsel on settlement agreement [1]; call with co-counsel on division of labor [.1]; memorializing notes for edits from call [.1]; gathering authority for SDNY fee claim [.6]	1.8	\$ 575.00	\$	1,035.00
2/4/2020 RT	Revised draft settlement agreement to incorporate edits from opposing counsel [2.8]; researched judge's prior treatment of counsel fee approvals [.9]; email revised documents to co-counsel for review [.2]	3.9	\$ 575.00	\$	2,242.50
2/7/2020 RT	Revise notice exhibits for settlement consistent with edits to draft settlement agreement [1.5]; drafted proposed order for preliminary approval [2]; drafted proposed order for final approval [1.1]; email to co-counsel on needed revisions to draft settlement following drafting of proposed orders [.2]	4.8	\$ 575.00	\$	2,760.00

2/12/2020	RT	Revised individual settlement agreements [1.8]	1.8	\$ 575.00	\$	1,035.00
		Review of revised settlement documents and email to co-counsel outlining additional issues and concerns [2.6]; emails arranging				
3/25/2020	RT	finalization of adequacy declarations [.2]	2.8	\$ 575.00	\$	1,610.00
3/26/2020	RT	Completed revised adequacy declarations [.3]	0.3	\$ 575.00	\$	172.50
		Email to co-counsel on status of preliminary approval brief [.1]; email				
3/30/2020	RT	revised declaration to co-counsel [.2]	0.3	\$ 575.00	\$	172.50
		Revised brief in support of preliminary approval [2.4]; drafted summaries of adequacy declarations [.5]; researched and drafted new subsections describing effect of individual settlements, effectiveness of				
4/2/2020	RT	claims process, and equity among class members [3.9]	6.8	\$ 575.00	\$	3,910.00
		Completed final revision of adequacy declarations and sent to co-				
4/6/2020	RT	counsel [.4]	0.4	\$ 575.00	\$	230.00
4/3/2020	RT	Revised brief in support of preliminary approval [1.9]	1.9	\$ 575.00	\$	1,092.50
		Comparing as-filed versions to ensure correct document goes to				
5/30/2020	RT	administrator [1.5]; email to co-counsel [.1]	1.6	\$ 575.00	\$	920.00
5/31/2020	RT	Email summarizing issues with documents [.1]	0.1	\$ 575.00	\$	57.50
		Review of revised notice to ensure changes I found were made [.2]	0.2	\$ 575.00	\$	115.00
			71		\$	40,825.00
		Total	447.5		\$	249,586.00

— EXHIBIT B —

Terrell Marshall Law Group PLLC

Sterling
Matter ID 2054-001
Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
Component: Air Fare						
347751	06/09/2019		Air fare	1.00	289.20	289.20
380276	06/11/2019		Air fare	1.00	162.30	162.30
380236	08/25/2019		Air fare	1.00	342.00	342.00
380235	08/28/2019		Air fare	1.00	112.15	112.15
380364	12/16/2019		Air fare	1.00	224.30	224.30
				Component: Air Fare		
						<u>1,129.95</u>
Component: Courier/PS						
332544	12/18/2018		Courier/process server	1.00	167.50	167.50
332551	12/28/2018		Courier/process server	1.00	167.50	167.50
				Component: Courier/PS		
						<u>335.00</u>
Component: Expert						
352876	08/16/2019		Expert	1.00	89,306.34	89,306.34
				Component: Expert		
						<u>89,306.34</u>
Component: Filing Fee						
281129	04/14/2017		Filing Fees	1.00	1.00	1.00
281131	04/14/2017		Filing Fees	1.00	10.00	10.00
281880	04/25/2017		Filing Fees	1.00	200.00	200.00
282490	05/01/2017		Filing Fees	1.00	200.00	200.00

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Sterling
Matter ID 2054-001
Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
282474	05/02/2017		Filing Fees	1.00	231.00	231.00
337932	03/06/2019		Filing Fees	1.00	5.00	5.00
339174	03/19/2019		Filing Fees	1.00	200.00	200.00
				Component: Filing Fee		
						<u>847.00</u>
Component: Hotel						
351319	06/09/2019		Hotel Charges	1.00	809.55	809.55
380230	08/26/2019		Hotel Charges	1.00	130.89	130.89
380228	12/16/2019		Hotel Charges	1.00	347.67	347.67
				Component: Hotel		
						<u>1,288.11</u>
Component: Meal						
351312	06/10/2019		Meal	1.00	16.89	16.89
351315	06/10/2019		Meal	1.00	57.91	57.91
351314	06/11/2019		Meal	1.00	81.42	81.42
				Component: Meal		
						<u>156.22</u>
Component: Mediation						
352875	08/16/2019		Mediation Fees	1.00	8,920.92	8,920.92
				Component: Mediation		
						<u>8,920.92</u>
Component: PACER						
327038	10/23/2018		PACER	1.00	0.40	0.40
				Component: PACER		
						<u>0.40</u>

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Terrell Marshall Law Group PLLC

Sterling
Matter ID 2054-001
Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
Component: Postage						
281398	04/18/2017		Postage	1.00	1.84	1.84
				Component: Postage	1.00	1.84
Component: Rep B&W						
290195	08/11/2017		Reproduction (B&W)	10.00	0.15	1.50
				Component: Rep B&W	10.00	1.50
Component: Taxi						
351313	06/10/2019		Taxi	1.00	60.48	60.48
365424	12/16/2019		Taxi	1.00	5.19	5.19
365427	12/16/2019		Taxi	1.00	77.06	77.06
365425	12/17/2019		Taxi	1.00	131.14	131.14
365426	12/17/2019		Taxi	1.00	8.50	8.50
365428	12/18/2019		Taxi	1.00	19.11	19.11
365429	12/18/2019		Taxi	1.00	124.83	124.83
				Component: Taxi	7.00	426.31
Component: Transport						
353693	08/27/2019		Transportation	1.00	234.00	234.00
				Component: Transport	1.00	234.00
Component: Westlaw						
282895	04/19/2017		Westlaw charges	1.00	1.87	1.87

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Terrell Marshall Law Group PLLC

Sterling
Matter ID 2054-001
Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
289746	07/14/2017		Westlaw charges	1.00	2.65	2.65
289747	07/17/2017		Westlaw charges	1.00	1.06	1.06
289748	07/31/2017		Westlaw charges	1.00	0.59	0.59
328300	10/01/2018		Westlaw charges	1.00	1.67	1.67
328301	10/08/2018		Westlaw charges	1.00	0.57	0.57
328305	10/09/2018	ELN	Westlaw charges	1.00	1.23	1.23
328306	10/10/2018	ELN	Westlaw charges	1.00	0.55	0.55
328302	10/12/2018		Westlaw charges	1.00	1.36	1.36
328303	10/15/2018		Westlaw charges	1.00	2.13	2.13
328307	10/17/2018	ELN	Westlaw charges	1.00	2.49	2.49
328304	10/19/2018		Westlaw charges	1.00	2.66	2.66
331088	11/02/2018		Westlaw charges	1.00	1.35	1.35
331089	11/05/2018		Westlaw charges	1.00	2.63	2.63
332893	12/18/2018		Westlaw charges	1.00	0.33	0.33
348863	06/24/2019		Westlaw Charges	1.00	3.37	3.37
366860	01/24/2020		Westlaw Charges	1.00	5.21	5.21
374906	04/02/2020		Westlaw Charges	1.00	12.02	12.02
374907	04/06/2020		Westlaw Charges	1.00	0.22	0.22
Component: Westlaw				19.00		43.96
Grand Total:				61.00		\$102,691.55

Terrell Marshall Law Group PLLC

Sterling
Matter ID 2054-001
Costs Report