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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JADE WILCOX, on behalf of herself and all others similarly situated, Plaintiffs, v. SWAPP LAW, PLLC, d/b/a CRAIG SWAPP AND ASSOCIATES, and JAMES CRAIG SWAPP, individually, Defendants	Case No. 2:17-cv-275-RMP Related to Case No. 2:17-cv-122-RMP **CLASS COUNSELS' MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES**

TABLE OF CONTENTS

Table of Authorities .....Error! Bookmark not defined.
Index of Exhibits vii
Summary of Counsel's Rates, Hours, and Expenses viii
Memorandum of Points and Authorities 1
I. Background Facts 1
A. The Investigation 1
B. Procedural History 3
C. Settlement Negotiations and the Settlement Agreement 5
D. Notice to Class Members 7
II. Class Counsel are Entitled to their Lodestar Fees 7
A. The Hourly Rates of Plaintiff's Counsel are Reasonable 9
B. The Hours Expended by Plaintiff's Counsel are Reasonable 13
C. The Benefit Obtained for the Class is Significant 16
D. There is No Collusion Between the Parties 19
III. Alternatively, the Court Can Award Fees Based on the Common Fund 22
IV. Plaintiff's Counsel's Cost Request Should be Approved 23
Conclusion 25

TABLE OF AUTHORITIES

Page(s)

Cases

In re Activision Sec. Litig.,
723 F. Supp. 1373 (N.D. Cal. 1989) 22

Anderson v. AB Painting & Sandblasting, Inc.,
578 F.3d 542 (7th Cir. 2009) 20

Andrews v. Sirius XM Radio Inc.,
932 F.3d 1253 (9th Cir. 2019) 19

In re Bluetooth Headset Prods. Liab. Litig.,
654 F.3d 935 (9th Cir. 2011) 8, 9, 17, 19

Blum v. Stenson,
465 U.S. 886 (1984) 10

Boeing Co. v. Van Gemert,
444 U.S. 472 (1980) 22

Bravo v. City of Santa Maria,
810 F.3d 659 (9th Cir. 2016) 9, 17

Camacho v. Bridgeport Fin. Inc.,
523 F.3d 973 (9th Cir. 2008) 10

In re: Cathode Ray Tube (CRT) Antitrust Litig.,
No. 07 CV 5944, 2016 WL 4126533 (N.D. Cal. Aug. 3, 2016) 24

Charlebois v. Angels Baseball LP,
993 F. Supp. 2d 1109 (C.D. Cal. 2012) 13

Chaudhry v. City of Los Angeles,
751 F.3d 1096 (9th Cir. 2014) 10

Chrapliwy v. Uniroyal, Inc.,
670 F.2d 760 (7th Cir. 1982) 12

Craft v. Cty. of San Bernardino,
624 F. Supp. 2d 1113 (C.D. Cal. 2008) 23

Davis v. City & County of San Francisco,
976 F.2d 1536 (9th Cir. 1992), *vacated in other part by* 984 F.2d 345 (9th Cir. 1993).....24

Dowd v. City of Los Angeles,
28 F. Supp. 3d 1019 (C.D. Cal. 2014) 21

In re Facebook Privacy Litig.,
572 F. App'x 494 (9th Cir. 2014).....18

Fair Hous. v. Combs,
285 F.3d 899 (9th Cir. 2002) 20

In re Ferrero Litig.,
583 F. App'x 665 (9th Cir. 2014) 21

Fresco v. Auto. Directions, Inc.,
No. 03 CV 61063, 2009 WL 9054828 (S.D. Fla. Jan. 20, 2009) 8

G. F. v. Contra Costa Cty,
No. 13 CV 3667, 2015 WL 7571789 (N.D. Cal. Nov. 25, 2015).....20, 21

Gordon v. Virtumundo, Inc.,
No. 06 CV 204, 2007 WL 2253296 (W.D. Wash. Aug 1. 2007) 24

Guerrero v. Cal. Dep't of Corr. & Rehab.,
No. 13 CV 5671, 2016 WL 3360638 (N.D. Cal. June 16, 2016) 20

Harris v. Marhoefer,
24 F.3d 16 (9th Cir. 1994) 24

Harris v. Amgen Inc.,
No. CV075442PSGPLAX, 2017 WL 6048215 (C.D. Cal. Apr. 4, 2017) 24

Hartford Cas. Ins. v. Swapp Law, PLLC,
No. 17 CV 1130, 2019 WL 3500520 (D. Utah Aug. 1, 2019) 12

Hensley v. Eckerhart,
461 U.S. 424 (1983).....8, 9, 10, 13

Jacobson v. Wash. State Univ.,
No. 05 CV 92, 2007 WL 9717373 (E.D. Wash. Nov. 16, 2007) 20

Kelly v. Wengler,
822 F.3d 1085 (9th Cir. 2016) 8

In re Mercury Interactive Corp. Sec. Litig.,
618 F.3d 988 (9th Cir. 2010) 7

Morales v. City of San Rafael,
96 F.3d 359 (9th Cir. 1996), *amended,* 108 F.3d 981 (9th Cir. 1997) 21

Moreno v. City of Sacramento,
534 F.3d 1106 (9th Cir. 2008) 10, 13

Muniz v. United Parcel Serv., Inc.,
738 F.3d 214 (9th Cir. 2013) 20

In re Omnivision Techs., Inc.,
559 F. Supp. 2d 1036 (N.D. Cal. 2008).....22

Pavone v. Meyerkord & Meyerkord, LLC,
321 F.R.D. 314 (N.D. Ill. 2017).....18

Roberts v. Source for Pub. Data, LP,
No. 08 CV 4167, 2010 WL 2195523 (W.D. Mo. May 28, 2010) 17

Sako v. Wells Fargo Bank. N.A.,
No. 14 CV 1034, 2016 WL 2745346 (S.D. Cal. May 11, 2016).....21

Six (6) Mexican Workers v. Ariz. Citrus Growers,
904 F.2d 1301 (9th Cir. 1990) 8, 23

Spell v. McDaniel,
616 F. Supp. 1069 (E.D.N.C. 1985) 12

Stanger v. China Elec. Motor, Inc.,
812 F.3d 734 (9th Cir. 2016) 8, 9

Staton v. Boeing Co.,
327 F.3d 938 (9th Cir. 2003) 7

Svenson v. Google Inc.,
No. 13 CV 4080, 2015 WL 1503429 (N.D. Cal. Apr. 1, 2015) 18

Taylor v. City of Amboy,
No. 14 CV 722, 2017 WL 4075163 (D. Minn. Sept. 14, 2017) 8

Trs. of the Const. Indus. and Laborers Health and Welfare Tr. v. Redland Ins. Co.,
460 F.3d 1253 (9th Cir. 2006) 24

Truesdell v. Thomas,
No. 13 CV 552, 2015 WL 12681655 (M.D. Fla. Feb. 13, 2015), *report and recommendation adopted*, 2015 WL 12698396 (M.D. Fla. Mar. 17, 2015).....18

United Steelworkers of Am. v. Phelps Dodge Corp.,
896 F.2d 403 (9th Cir. 1990) 10

Van Gerwen v. Guar. Mut. Life Co.,
214 F.3d 1041 (9th Cir. 2000) 8, 10, 13

Vedachalam v. Tata Consultancy Servs.,
No. 06 CV 963, 2013 WL 3941319 (N.D. Cal. July 18, 2013).....23

Vizcaino v. Microsoft Corp.,
290 F.3d 1043 (9th Cir. 2002) 23

Wallis v. BNSF Ry. Co.,
No. 13 CV 40, 2014 WL 1648472 (W.D. Wash. Apr. 23, 2014).....21

In re Washington Pub. Power Supply Sys. Sec. Litig.,
19 F.3d 1291 (9th Cir. 1994) 11

Wilcox v. Bastiste,
No. 17 CV 122, 2017 WL 2525309 (E.D. Wash. June 9, 2017).....1

Wren v. RGIS Inventory Specialists,
No. 06 CV 5778, 2011 WL 1230826 (N.D. Cal. Apr. 1, 2011), *supplemented*, 2011 WL 1838562 (N.D. Cal. May 13, 2011).....13, 14

Zamora Jordan v. Nationstar Mortg., LLC,
No. 14 CV 175, 2019 WL 1966112 (E.D. Wash. May 2, 2019).....10

Statutes

18 U.S.C. § 2721 2

18 U.S.C. § 2722(a) 2

18 U.S.C. § 2724(b)(1) 3

18 U.S.C. § 2724(b)(3) 22, 23

18 U.S.C. § 2724(b)(4) 8

18 U.S.C. § 2725(3) 2

Other Authorities

Fed. R. Civ. P. 12(b)(6) 3

Fed. R. Civ. P. 23(f) 5

Fed. R. Civ. P. 23(h) 1, 7

Fed. R. Civ. P. 30(b)(6) 3, 14

INDEX OF EXHIBITS

SUMMARY OF COUNSEL'S RATES, HOURS, AND EXPENSES
Block & Leviton LLP Rates and Hours[1]

Name	2017 Rate	2018 Rate	2019 Rate	2020 Rate	Hours	Total (current rates)	Total (historical rates
Joe Barton (Partner)	$710	$750	$825	$875	451.3	$394,887.50	$342,059.50
Jason Leviton (Partner)	$725	$765	$825	$875	7.9	$6,912.50	$5,869.50
Thomas Kirchofer (Associate, J.D. '06)	$600				645.6	$401,349.00	$92,392.50
Matt Smith (Associate, J.D. '11)		$600			22.5	$14,625.00	$399,954.00
Colin Downes (Associate, J.D. '15)		$425	$450	$475	210.3	$99,892.50	$13,500.00
Ming Siegel (Paralegal, B.A. '16)	$225	$235	$250	$265	267.7	$70,940.50	$63,535.00
Total						$988,607.00	$917,310.50

[1] Barton Decl. ¶ 2.

Block & Leviton LLP Hours at Lane Powell Comparator Rates[2]

Name	Lane Powell (Comparator) Rate	Hours	Total
Joe Barton (Partner)	$645 (B. Duffy)	451.3	$291,088.50
Jason Leviton (Partner)	$540 (R. McBride)	7.9	$4,226.50
Thomas Kirchofer (Associate, J.D. '06)	$450 (T. Washburn)	645.6	$290,520.00
Matt Smith (Associate, J.D. '11)	$450 (T. Washburn)	22.5	$10,125.00
Colin Downes (Associate, J.D. '15)	$330 (A. Schaer)	210.3	$69,399.00
Ming Siegel (Paralegal, B.A. '16)	$265[3]	267.7	$70,940.50
Total		1605.3	**$736,339.00**

Law Office of Thomas G. Jarrard, PLLC Rates and Hours[4]

Name	Rate	Hours	Total
Thomas G. Jarrard (Partner)	$450	253	$113,850.00
Robert A. Jarrard (Legal Assistant)	$75	43.5	$3,262.50
Total		298.5	$117,112.50

[2] Barton Decl. ¶ 2, 18; Barton Decl. Ex. A at 7, 18-24.
[3] Ms. Siegel's billing rates are below that of any paralegal Lane Powell staffed to this case. See Barton Decl. Ex. A at ¶¶ 20, 24.
[4] Jarrard Decl. ¶ 20.

Sweetser Law Office [5]

Name	Rate	Hours	Total
Jim Sweetser (Partner)	$550.00	173.85	$95,617.00
Marcus Sweetser (Partner)	$375.00	95.95	$35,981.25
Daniel Eigler (Associate)	$300.00	2.7	$810.00
Kizzie Johnson (Paralegal)	$200.00	61.71	$9,256.50
Total		334.21	$141,665.75

Summary of Combined Fee Requests

Firm	Hours	Fees
Block & Leviton LLP	1,605.3	$988,607.00
Law Office of Thomas G. Jarrard PLLC	298.5	$117,112.50
Sweetser Law Office	334.21	$141,665.75
Total	2,238	$1,247,385.25

Summary of Combined Litigation Expenses

Firm	Expenses
Block & Leviton LLP	$47,918.53
Law Office of Thomas G. Jarrard PLLC	$2,401.03
Sweetser Law Office	$5,139.56
Total	$55,459.12

[5] Sweetser Decl. ¶ 15.

Pursuant to Fed. R. Civ. P. 23(h), Class Counsel hereby moves the Court for an order (1) awarding Plaintiff's Counsel up to $1,247,385.25 in attorneys' fees; and (2) reimbursement of litigation expenses incurred.

MEMORANDUM OF POINTS AND AUTHORITIES

I. Background Facts

A. The Investigation

In early 2015, Plaintiff's counsel James Sweetser began investigating the business practices of James Craig Swapp and his law firm, Craig Swapp and Associates ("Swapp"). In the State of Washington, law enforcement officers use standard PTCRs to document vehicle accidents. ECF No. 62-2 at 8:9-16; ECF No. 61-2 at 23:5-8. Before June 9, 2017, the Washington State Patrol ("WSP") routinely sold PTCRs—containing drivers' names and addresses—to anyone who wished to buy them through the WSP website. ECF No. 62-2 at 25:21-26:22; *see Wilcox v. Bastiste*, No. 17 CV 122, 2017 WL 2525309 at *4 (E.D. Wash. June 9, 2017). Mr. Sweetser learned that Swapp routinely purchased thousands of PTCRs for the purpose of soliciting potential clients for personal injury work. ECF No. 61-7 at Nos. 2(a), (b) and (c). The Sweetser Law Office conducted an investigation into the practices and policies of the WSP in connection with the collection and dissemination of PTCRs. Sweetser also investigated the nature and extent of Swapp Law's PTCR-driven marketing practices and whether they complied with

relevant law and ethics rules, including the Driver's Privacy Protection Act, 18 U.S.C. § 2721, *et seq*. ("DPPA). Sweetser Decl. ¶ 7.

The DPPA makes it "unlawful for any person knowingly to obtain or disclose personal information, from a motor vehicle record, for any use not permitted under Section 2721(b)" of the DPPA. 18 U.S.C. § 2722(a). The DPPA defines personal information to mean "information that identifies an individual, including an individual's photograph, social security number, driver identification number, name, [and] address…."18 U.S.C. § 2725(3). The PTCRs contain information identifying individuals, including names and addresses, and the police generally obtain this information from drivers' licenses or registrations to prepare PTCRs. Based on his firm's investigation and analysis, Mr. Sweetser concluded Swapp's practices violated the DPPA.

Plaintiff Jade Wilcox consulted with and retained the Sweetser Law Office on August 10, 2016, for injuries related to two traffic collisions on August 1, 2015 and July 9, 2016. But prior to retaining Sweetser Law Office, Ms. Wilcox had received a received a letter from Swapp that offered legal services and stated they learned "from Washington public records" that she was "involved in a serious accident on July 9." ECF No. 62-1 at 1. The letter enclosed a booklet advertising Swapp. *Id*. Ms. Wilcox considered the way "they got my address" to be "an invasion of [her] privacy." ECF No. 62-3 at 94:19-24. Ms. Wilcox then also

retained Sweetser to bring a class action lawsuit against Swapp for violations of the DPPA on August 3, 2017.

B. Procedural History

The initial complaint was filed on August 9, 2017. ECF No. 1. The Complaint requested relief on behalf of a Class of other drivers whose personal information was obtained or used by Defendants consisting of declaratory and injunctive relief aimed at preventing and restraining Defendants' practice of illegally obtaining PCTRs, and from disclosing or using the DPPA-protected information in their possession, statutorily provided liquidated damages of $2,500 for each violation of the DPPA under 18 U.S.C. § 2724(b)(1). Am Compl. at Prayer for Relief ¶¶ A-I.

Defendants responded to the Complaint by filing a motion to dismiss under Rule 12(b)(6), which the Court denied, ECF No. 21. Defendants then answered the Complaint and asserted 14 affirmative defenses. ECF No. 22. During the course of discovery, Class Counsel issued 24 interrogatories and 33 documents requests to Defendants and reviewed more than 40,000 pages of documents produced by them. ECF No. 139-1 ¶ 3; Barton Decl. ¶ 15. Class Counsel took depositions under Rule 30(b)(6) of the Washington Department of Licensing, the Washington State Patrol (in depositions spanning two days), the Washington State Criminal Justice Training Commission, and the Spokane Police Department. ECF No. 139-1 ¶ 5.

Class Counsel also defended Defendants' deposition of Plaintiff Jade Wilcox. *Id.* Class Counsel filed two motions to compel seeking responses to interrogatories, which were granted in part. ECF No. 139-1 ¶ 3; ECF Nos. 65 & 79. Class Counsel also successfully opposed Defendants motion to compel discovery from one of Plaintiffs' counsel. ECF No. 139-1 ¶ 4; ECF Nos. 75, 84, 106.

Based on information obtained in discovery, Plaintiff filed an Amended Complaint that added to the factual allegations, but did not add any new legal claim. ECF No. 69. Defendants moved to dismiss the Amended Complaint, which the Court denied. ECF Nos. 80, 108. After extensive discovery, Plaintiff moved for Class Certification of the Class, which the Court granted. ECF Nos. 61 & 109. The Class certified by the Court is defined as:

> All drivers identified in Police Traffic Collision Reports whose Personal Information, as defined by the DPPA, was derived from a Department of Licensing record (e.g. license, registration or database) and the Report was obtained or used by the Swapp Law Firm (d/b/a Craig Swapp & Associates) or Mr. Swapp from the Washington State Patrol between September 1, 2013 and June 23, 2017.[6]

Id. at 30. Defendants subsequently filed motions to reconsider class certification, to

[6] Excluded from the Class are (a) current and former clients of Defendants; (b) individuals identified on the same PTCRs as Defendants' clients; (c) individuals who provided written consent to Defendants for the disclosure of their Personal Information (as defined by the DPPA) prior to Defendants obtaining their personal information; (d) employees (and attorneys) of Defendants and members of their immediate families; and (e) the presiding judge and anyone working in the presiding judge's chambers and the members of their families.

certify the order on the Second Motion to Dismiss for interlocutory review, and announced the intention to seek interlocutory review of class certification by the Ninth Circuit under Rule 23(f), ECF No. 113, 115 at 3 n.1. At the request of the parties and with these motions pending, the case was stayed and referred to Hon. Lonny Suko for mediation. ECF No. 117.

C. Settlement Negotiations and the Settlement Agreement.

Plaintiff's counsel sent a settlement demand to Defendants in May of 2018. Barton Decl. ¶ 16. Defendants did not respond to that demand until after the Parties had requested mediation with Judge Suko. *Id.* Before mediation, Class Counsel requested, obtained and reviewed a significant amount of financial materials in order to evaluate Defendants' ability to satisfy a potential judgment in this case. ECF No. 139-1 at ¶ 7. As part of their review, Class Counsel hired an economist to assist in understanding the documents and evaluating Defendants' finances. *Id*. The Parties exchanged pre-mediation settlement offers and then attended an in-person mediation session on May 23, 2019 with Senior Judge Lonny Suko. *Id.* ¶ 9. An agreement in principle was reached only at the end of the all-day mediation session. *Id.*

Following further negotiation, the parties then entered into the formal Settlement Agreement on October 25, 2019. The Court granted preliminary approval to the Settlement Agreement on November 27, 2019. ECF No. 141.

The terms of the proposed settlement between Plaintiff and Defendants provide both a monetary and non-monetary consideration. ECF No. 139-2 ("Agmt.") §§ 4, 6. Under the Settlement, Defendants agreed to refrain from purchasing PTCRs in or from the State of Washington for the purpose of acquiring contact information for potential clients and sending marketing materials to them. *Id*. § 6.1. Defendants also agree that they will cease using any such PTCRs for those purposes, and will, within 120 days after the final distribution to the Class Members, destroy all such PTCRs and personal information taken from them. *Id*. § 6.3-4. Defendants also agreed to notify Class Counsel of any third parties to whom Defendants have provided such PTCRs (or personal information from the PTCRs), and will notify such third parties that Plaintiff and the Class consider those records to contain information protected by the DPPA. *Id*. § 6.5-6. In short, the Settlement Agreement provides all of the non-monetary relief requested in the Complaint.

Defendants agreed to pay (1) $950,000 into a Settlement Fund, which minus only settlement administration expenses, will be paid to the Class (and which will be fully funded by June 1, 2020); and (2) between $900,000 and $1.05 million (depending on whether the amount is paid by December 1, 2020 or paid over three years), out of which any award of attorneys' fees, litigation expenses and class representative service award, and if there are any remaining amounts, the remainder will be paid to the Settlement Fund. Agmt. §§ 4.1, 4.2.

The Net Settlement Fund will be paid to the Class Members pursuant to a Plan of Allocation that proposes that Settlement Fund will be evenly divided among all Class Members and that Class Members will receive a payment without needing to complete a claim form. ECF No. 139-4 at 3. Distribution of the Settlement Funds to Class Members without a claims process should greatly increase the number of persons who actually benefit from the Settlement.

D. Notice to Class Members

The Class Notice, which describes Plaintiffs' request for attorneys' fees and litigation expenses, was sent to Class Members by U.S. Mail on January 8, 2020 and posted on the settlement website. ECF No. 142. No objections have been received.

II. Class Counsel are Entitled to their Lodestar Fees

"Attorneys' fees provisions included in proposed class action settlement agreements are, like every other aspect of such agreements, subject to the determination of whether the settlement is 'fundamentally fair, adequate, and reasonable.'" *Staton v. Boeing Co.*, 327 F.3d 938, 963 (9th Cir. 2003) (quoting Fed. R. Civ. P. 23(e)). Rule 23(h) "requires that any class member be allowed an opportunity to object to the fee 'motion' itself." *In re Mercury Interactive Corp. Sec. Litig.*, 618 F.3d 988, 993-994 (9th Cir. 2010). This Court's Preliminary Approval Order set the date consistent with that requirement. ECF No. 141 at 6.

Courts generally use the lodestar method to award fees under statutes like the DPPA, which provide for fee shifting. *In re Bluetooth Headset Prods. Liab. Litig.*, 654 F.3d 935, 941 (9th Cir. 2011) ("The 'lodestar method' is appropriate in class actions brought under fee-shifting statutes"); *Six (6) Mexican Workers v. Ariz. Citrus Growers*, 904 F.2d 1301, 1311 (9th Cir. 1990) (explaining that "statutory awards of attorneys' fees are subject to 'lodestar' calculation procedures"); *see Taylor v. City of Amboy*, No. 14 CV 722, 2017 WL 4075163, at *1 (D. Minn. Sept. 14, 2017) (applying lodestar method to award fees in DPPA case); *Fresco v. Auto. Directions, Inc.*, No. 03 CV 61063, 2009 WL 9054828, at *8 (S.D. Fla. Jan. 20, 2009) (same); *see also* 18 U.S.C. § 2724(b)(4) (providing court may award "reasonable attorneys' fees and other litigation costs reasonably incurred").

The lodestar method consists of two steps. *Kelly v. Wengler*, 822 F.3d 1085, 1099 (9th Cir. 2016). *First*, a court multiplies a reasonable number of hours expended on the litigation by a reasonable hourly rate to arrive at a lodestar figure. *Stanger v. China Elec. Motor, Inc.*, 812 F.3d 734, 738 (9th Cir. 2016); *Kelly*, 822 F.3d at 1099. *Second,* the court determines whether to adjust the lodestar figure upward or downward using a multiplier based on factors not subsumed in the lodestar calculation. *Id.*; *Van Gerwen v. Guar. Mut. Life Co.*, 214 F.3d 1041, 1045 (9th Cir. 2000).[7] Among those factors, "the degree of success obtained is the most

[7] Under *Hensley v. Eckerhart*, 11 factors are relevant to the determination of the

critical factor in determining the reasonableness of a fee award." *Bravo v. City of Santa Maria*, 810 F.3d 659, 666 (9th Cir. 2016); *In re Bluetooth,* 654 F.3d at 942 (the most crucial factor is "the benefit obtained for the class"). "Because there is a strong presumption that the lodestar represents a reasonable fee, adjustments to the lodestar are the exception rather than the rule." *Stanger*, 812 F.3d at 738. If there be "warning signs" of collusion the court must examine whether the settlement "does not betray the class's interests." *In re Bluetooth*, 654 F.3d at 947, 949.

Here, the claims of the Class are brought under a fee-shifting statute, and the lodestar method applies. Because the hourly rates of Plaintiff's counsel and the hours expended on this litigation are reasonable, the lodestar is reasonable. As the monetary and non-monetary benefits obtained for the Class are significant, the lodestar figure should not be adjusted downward. Further, there is no collusion between the parties.

A. The Hourly Rates of Plaintiff's Counsel are Reasonable

A reasonable number of hours expended by a party's counsel "is calculated

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amount of attorney's fees: (1) time and labor required; (2) novelty and difficulty of the issues; (3) skill requisite to perform the legal service properly; (4) preclusion of employment by the attorney due to acceptance of the case; (5) customary fee; (6) time limitations imposed by the client or the circumstances; (7) the amount involved and the results obtained; (8) experience, reputation and ability of the attorneys; (9) "undesirability" of the case; (10) nature and length of the professional relationship with the client; and (11) awards in similar cases. 461 U.S. 424, 430 n.3 (1983).

by considering whether, in light of the circumstances, the time could reasonably have been billed to a private client." *Moreno v. City of Sacramento*, 534 F.3d 1106, 1111 (9th Cir. 2008). Counsel are expected to "make a good faith effort to exclude . . . hours that are excessive, redundant, or otherwise unnecessary." *Hensley*, 461 U.S. at 434; *Van Gerwen*, 214 F.3d at 1045 (citing *Hensely*). The established standard for determining a reasonable hourly rate is the rate "prevailing in the community for similar services of lawyers of reasonably comparable skill, experience, and reputation." *Blum v. Stenson*, 465 U.S. 886, 895 n.11 (1984); *Camacho v. Bridgeport Fin. Inc.*, 523 F.3d 973, 979 (9th Cir. 2008). A reasonable hourly rate should account for factors such as the attorney's customary hourly billing rate, the level of skill required by the litigation, the time limitations imposed on the litigation, the amount of potential recovery, the attorney's reputation, and the undesirability of the case. *Zamora Jordan v. Nationstar Mortg., LLC,* No. 14 CV 175, 2019 WL 1966112, at *8 (E.D. Wash. May 2, 2019). "Affidavits of the plaintiffs' attorney and other attorneys regarding prevailing fees in the community, and rate determinations in other cases, particularly those setting a rate for the plaintiffs' attorney, are satisfactory evidence of the prevailing market rate." *United Steelworkers of Am. v. Phelps Dodge Corp.*, 896 F.2d 403, 407 (9th Cir. 1990); *Chaudhry v. City of Los Angeles*, 751 F.3d 1096, 1110 (9th Cir. 2014).

Here, the hourly rates charged by Plaintiff' counsel are based on each

professional's position, experience, and expertise. Block & Leviton LLP's rates fall between $225 and $875. Barton Decl. ¶ 2-3. These rates represent the customary billing rates for the firm's professionals and the level of skill required in a complex class action case of this type. Barton Decl. ¶ 3. Historical rates for all years in which professionals billed time to this case are provided along with current rates for all professionals still employed by Block & Leviton LLP. A "district court has discretion to compensate delay in payment in one of two ways: (1) by applying the attorneys' current rates to all hours billed during the course of the litigation; or (2) by using the attorneys' historical rates and adding a prime rate enhancement." *In re Washington Pub. Power Supply Sys. Sec. Litig.*, 19 F.3d 1291, 1305 (9th Cir. 1994).

Courts have recognized Block & Leviton's and specifically Mr. Barton's significant experience with complex class action litigation and approved their customary rates in other cases. Barton Decl. ¶ 7. Comparisons to Block & Leviton's paying clients and to opposing counsel also establish the reasonableness of Block & Leviton's billing rates. Not only have Mr. Barton's and Block & Leviton's customary rates been repeatedly approved by courts, but private clients pay them. Both a Fortune 100 company and a major private insurer have previously retained Mr. Barton and Block & Leviton at their customary rates. Barton Decl. ¶ 6. Both sides in this litigation recognized this case was complex and

sought specialized counsel from outside the jurisdiction: Defendants lead counsel in this litigation, Seattle-based Barbara Duffy of Lane Powell, billed for her and her team's time at a similar payscale of $540-$645 for partners and $330-$450 associates. Barton Decl. Ex. A ¶ 19-24. *Hartford Cas. Ins. v. Swapp Law, PLLC*, No. 17 CV 1130, 2019 WL 3500520, at *2 (D. Utah Aug. 1, 2019); s*ee Chrapliwy v. Uniroyal, Inc.*, 670 F.2d 760, 768 n.18 (7th Cir. 1982) ("The rates charged by the defendant's attorneys provide a useful guide to rates customarily charged in this type of case" and when "defendant has hired expensive, out of town counsel, the plaintiffs seem justified in saying that the nature of the case required the skills of out of town specialists."); *Spell v. McDaniel*, 616 F. Supp. 1069, 1092 (E.D.N.C. 1985) (rejecting attempt by "defendants … to invoke a double standard for this fee litigation—one set of rules governing payment of defense counsel and quite another for plaintiff's counsel."). Block & Leviton has provided an alternative payscale using similarly experienced attorneys at Lane Powell as comparators. Barton Decl. ¶ 18.

Thomas G. Jarrard's hourly rate of $450 for Thomas G. Jarrard (Partner) and $75 for Robert A. Jarrard (Legal Assistant). These rates represent the customary billing rates for the firm in federal court class litigation over the past several years. Jarrard Decl. ¶ 16. Numerous courts have approved these rates, including in class litigation in this district. Jarrard Decl. ¶ 17.

The Sweetser Law Offices rates for professionals associated with the firm who have performed work on this case from between $150 and $550. These rates are commensurate with other attorneys and professionals billing for federal class litigation done in the Spokane community with a similar level of experience. Sweetser Decl. ¶ 10.

B. The Hours Expended by Plaintiff's Counsel are Reasonable

A reasonable number of hours expended by a party's counsel "is calculated by considering whether, in light of the circumstances, the time could reasonably have been billed to a private client." *Moreno*, 534 F.3d at 1111. Counsel are expected to "make a good faith effort to exclude . . . hours that are excessive, redundant, or otherwise unnecessary." *Hensley*, 461 U.S. at 434; *Van Gerwen*, 214 F.3d at 1045 (citing *Hensely*). "To reduce the number of hours worked, it must appear that the time claimed is obviously and convincingly excessive under the circumstances." *Charlebois v. Angels Baseball LP*, 993 F. Supp. 2d 1109, 1123 (C.D. Cal. 2012). In assessing the reasonableness of the hours expended, courts have taken into account the fact that the amount of time billed by a plaintiff's counsel "is in large part a result of [a defendant's] aggressive defense strategy." *E.g.*, *Wren v. RGIS Inventory Specialists*, No. 06 CV 5778, 2011 WL 1230826, at *26 (N.D. Cal. Apr. 1, 2011), *supplemented*, 2011 WL 1838562 (N.D. Cal. May 13, 2011).

Plaintiff's counsel performed significant work to litigate this case vigorously and efficiently. For purposes of preparing the Complaint and the Amended Complaint, Plaintiff's counsel conducted extensive factual and legal investigations of the Washington State Patrol's processes for recording, collecting, storing, and disseminating PTCRs. Sweetser Decl. ¶ 7. During the course of this contentious and complex case, Class Counsel briefed and argued Plaintiff's oppositions to Defendants' two motions to dismiss. Barton Decl. ¶ 3.

Plaintiff's counsel also engaged in extensive discovery. Plaintiff issued 24 interrogatories and 33 document requests to Defendants. Class Counsel reviewed more than 40,000 pages produced by Defendants and non-parties in discovery, and produced more than 11,000 pages. Plaintiff's counsel took five days of depositions: Rule 30(b)(6) depositions of the Washington Department of Licensing, the Washington State Patrol, the Washington State Criminal Justice Training Commission, and the Spokane Police Department. ECF No. 139-1 ¶ 5. Class Counsel filed two motions to compel seeking responses to interrogatories, which were granted in part. ECF No. 139-1 ¶ 3; ECF Nos. 65 & 79. Class Counsel defended Defendants' deposition of Jade Wilcox and responded to 18 requests for production of documents and 13 interrogatories. *Id.* Class Counsel also briefed, argued, and secured certification of the class.

Only after a Class was certified and Defendants' second motion to dismiss was denied were Defendants interested in discussing settlement. Class Counsel then negotiated the Settlement at an all-day mediation. ECF No. 139-1 ¶ 11. Preparation for this mediation included requesting and reviewing extensive financial records in order understand the realistic ability of Defendants to satisfy a judgment were the case to proceed to trial. *Id.* at ¶¶ 7-8.

Wide-scale class discovery, class certifications, and dispositive motions are routine in class actions. But this case presented complicated legal issues in the unsettled area of interpretation of the DPPA. These included whether drivers' licenses and motor vehicle registrations are motor vehicle records for purposes of the DPPA and whether a plaintiff need show actual pecuniary harm in order to establish entitlement to liquidated damages. Furthermore, the complexity of factual issues relating to the WSP and other state law enforcement's policies and procedures in the creation, collection, and dissemination of PTCRs made these litigation components contentious and demanding. Barton Decl. ¶¶ 3, 8. And the time spent by Class Counsel was in part caused by Defense counsel's aggressive defense: while the total attorneys' fees and number of hours spent by Defendants' counsel to date in defending this case are not known to Plaintiff, Defendant had amassed approximately $718,000 in legal bills as of November 6, 2018. Barton Decl. Ex. A ¶ 26. Thus, the amount of time expended by Plaintiff's counsel to

litigate this case, including the time spent on opposing Defendants' motions to dismiss and moving to compel discovery responses and for class certification, was necessary.

To litigate this case efficiently, Class Counsel assigned work to junior attorneys and paralegals with lower hourly rates as appropriate. Barton Decl. ¶ 4; Jarrard Decl. ¶ 18; Sweetser Decl. ¶¶ 13-14. The Co-Class Counsel coordinated their work to avoid unnecessary duplication of effort. Barton Decl. ¶ 4; Jarrard Decl. ¶ 18. Attorneys from only one of the two Class Counsel appeared at any deposition and many of the depositions were taken by a Block & Leviton associate. Barton Decl. ¶ 4; Jarrard Decl. ¶ 18. Prior to filing their motion for attorneys' fees, counsel from each firm reviewed time entries, and, just as counsel would prior to sending bills to paying clients, removed time entries for duplicative or unnecessary work that ordinarily would not be billed client. Barton Decl. ¶ 5; Jarrard Decl. ¶ 18; Sweetser Decl. ¶ 16. The lodestar figure submitted by Plaintiff's counsel in support of their request for fees reflects these adjustments. In light of efforts by Plaintiff's counsel to litigate this case efficiently, as well as the significant work performed over the past two and a half years, the complexity of the legal issues presented, and Defendants' aggressive defense, the 2,238 hours expended by Plaintiff's counsel to date are reasonable.

C. The Benefit Obtained for the Class is Significant

A court may adjust a lodestar figure upward or downward by considering "the benefit obtained for the class." *In re Bluetooth Headset Prods. Liab. Litig.*, 654 F.3d at 942; *Bravo*, 810 F.3d at 666 ("the degree of success obtained is the most critical factor"). Here, Plaintiff's counsel does *not* seek an enhancement of lodestar, although the benefit obtained for the Class is significant, particularly in light of the uncertainties of establishing liability and relief.

Non-monetary relief in the form of changes to business practices and removal of protected information from the possession of Defendants accomplishes the privacy purposes of the DPPA. *See Roberts v. Source for Pub. Data, LP*, No. 08 CV 4167, 2010 WL 2195523, at *3 (W.D. Mo. May 28, 2010*)* (holding return and removal of DPPA-protected information alone, with no monetary component, constituted reasonable and satisfactory terms of settlement). Under the Settlement, Swapp is required to destroy the PTCRs or other records containing the personal information of Class Members and cannot use that personal information for any purpose. Agmt. § 6.2-4. Swapp is also required to notify third parties to whom they have transmitted the personal information of Class Members that the Class consider that information protected by the DPPA. Agmt. § 6.6. Swapp will no longer purchase PCTRs in or from the State of Washington for the purpose of soliciting clients. Agmt. § 6.1. This relief has value to the Class as courts have recognized that personal information has economic value. *In re Facebook Privacy*

Litig., 572 F. App'x 494 (9th Cir. 2014) (holding allegation of loss of sales value of personal information sufficient to plead damages); *Svenson v. Google Inc.*, No. 13 CV 4080, 2015 WL 1503429, at *5 (N.D. Cal. Apr. 1, 2015) (same).

The monetary component of the Settlement is also substantial. The Class will receive at least $950,000 (minus settlement administration costs), or $30.77 per Class member. While a judgment for the Class at trial could have been up to $25 million, Swapp would not be unlikely to be able to pay anything more than a fraction of the potential damages. ECF No. 139-1 ¶¶ 7- 8.

Given the major factual and legal disputes in this litigation, the complexity of litigating pattern or practice discrimination actions, and the low success rate of class actions brought under the DPPA, the result in this case is outstanding. *See Pavone v. Meyerkord & Meyerkord, LLC,* 321 F.R.D. 314 (N.D. Ill. 2017) (denying motion for class certification in DPPA case); *Truesdell v. Thomas*, No. 13 CV 552, 2015 WL 12681655, at *11 (M.D. Fla. Feb. 13, 2015), *report and recommendation adopted*, 2015 WL 12698396 (M.D. Fla. Mar. 17, 2015) (same).

These results are particularly favorable in light of caselaw decided after the mediation. The Ninth Circuit held that where the "source of personal information is a record in the possession of an individual, rather than a state DMV, then use or disclosure of that information does not violate the DPPA." *Andrews v. Sirius XM Radio Inc.*, 932 F.3d 1253, 1260 (9th Cir. 2019). While not dispositive of this case

given the different factual record, the holding in *Andrews* would have posed a substantial challenge to Plaintiff and the Class at summary judgment.

D. There is No Collusion Between the Parties

The Ninth Circuit has advised courts to be concerned when the following are present: (a) "when counsel receive a disproportionate distribution of the settlement, or when the class receives no monetary distribution but class counsel are amply rewarded"; (b) "when the parties negotiate a clear sailing arrangement providing for the payment of attorneys' fees separate and apart from class funds, which carries the potential of enabling a defendant to pay class counsel excessive fees and costs in exchange for counsel accepting an unfair settlement on behalf of the class"; and (c) "when the parties arrange for fees not awarded to revert to defendants rather than be added to the class fund." *In re Bluetooth Headset*, 654 F.3d at 947. These signs is not dispositive as they are merely "warning signs" that indicate the potential for collusion, *id*.; it only means that the fee provision in the settlement agreement must be supported by an explanation and "does not betray the class's interests." *Id*. at 949. Factors weighing in favor of a finding of non-collusiveness include that the parties worked with "a neutral mediator," *In re Bluetooth Headset*, 654 F.3d at 948 and that the settlement "largely accomplish[es] the injunctive relief sought." *G. F. v. Contra Costa Cty,* No. 13 CV 3667, 2015 WL 7571789, at *11 (N.D. Cal. Nov. 25, 2015).

Here, the factors demonstrate no collusion between the parties, and the fees provided are reasonable. *First*, the parties used a neutral mediator to negotiate the Settlement, including attorneys' fees. ECF No. 139-1 ¶ 9. *Second*, under fee-shifting statutes, the amount of attorneys' fees need not "be proportionate to the amount of damages recovered" and "fee awards that greatly exceed the damages recovered are not uncommon." *Jacobson v. Wash. State Univ.*, No. 05 CV 92, 2007 WL 9717373, at *5 (E.D. Wash. Nov. 16, 2007) (citing *Riverside v. Rivera*, 477 U.S. 561, 574 (1986)); *Anderson v. AB Painting & Sandblasting, Inc.*, 578 F.3d 542, 545-46 (7th Cir. 2009) ("Fee-shifting statutes remove th[e] normative decision from the court" about proportionality of fees to amount of damages because "Congress has already determined that the claim was worth bringing" no matter how small in comparison to costs to bring claim). Courts in the Ninth Circuit have approved fee requests by plaintiffs' counsel under fee-shifting statutes where the requested fees were greater than the plaintiff's monetary recovery. *See Muniz v. United Parcel Serv., Inc.*, 738 F.3d 214, 218, 225 (9th Cir. 2013) (affirming award of $696,162.78 in attorneys' fees where jury awarded $27,280 in damages); *Fair Hous. v. Combs*, 285 F.3d 899, 902 (9th Cir. 2002) (upholding fee award of $508,606.78 where damages recovered totaled $98,777); *Guerrero v. Cal. Dep't of Corr. & Rehab.*, No. 13 CV 5671, 2016 WL 3360638, at **3, 35, 38 (N.D. Cal. June 16, 2016) (awarding $1,186,307.70 in fees where plaintiff received

$140,362 in backpay); *Sako v. Wells Fargo Bank. N.A.*, No. 14 CV 1034, 2016 WL 2745346, at **2, 8 (S.D. Cal. May 11, 2016) (awarding $228,201 in fees under fee-shifting provision where plaintiff received $35,000 settlement); *Wallis v. BNSF Ry. Co., No*. 13 CV 40, 2014 WL 1648472, at **1, 7 (W.D. Wash. Apr. 23, 2014) (awarding $231,306.66 in fees in employment case based on $20,000 in damages); *Dowd v. City of Los Angeles*, 28 F. Supp. 3d 1019, 1029, 1031 (C.D. Cal. 2014) (awarding $601,902.50 in fees where jury awarded plaintiffs in § 1983 civil rights case $10 in nominal damages).

Third, the Settlement provides for significant injunctive relief. *Dowd*, 28 F. Supp. 3d at 1063-64 (awarding fees where plaintiff successfully challenged city policies and "secur[ing] important social benefits" not included in damages award); *G. F*, 2015 WL 7571789, at **9, 16 (awarding $2.5 million in attorneys' fees in class action where class relief was wholly injunctive); *In re Ferrero Litig.*, 583 F. App'x 665, 667, 668–69 (9th Cir. 2014) (affirming $985,920 fee award where settlement provided significant injunctive relief and $550,000 fund for class); *Morales v. City of San Rafael*, 96 F.3d 359, 364 (9th Cir. 1996), *amended,* 108 F.3d 981 (9th Cir. 1997) (finding significant non-monetary results should be considered in determining reasonable fee award). Finally, Class Counsel structured the Settlement to ensure that the Settlement Fund for the Class would be fully funded before any amount would be paid by Defendants toward attorneys' fees and

costs, and therefore having counsel, rather than the Class, bear the risk of non-payment and delayed payment. Thus, these factors demonstrate that the attorneys fees sought under the DPPA's fee-shifting provision, 18 U.S.C. § 2724(b)(3) are reasonable.

III. Alternatively, the Court Can Award Fees Based on the Common Fund

If the Court declines to award Class Counsel fees on a lodestar basis, the Court should award fees under the common fund doctrine. *Boeing Co. v. Van Gemert*, 444 U.S. 472, 478 (1980) ("[A] litigant or a lawyer who recovers a common fund . . . is entitled to a reasonable attorney's fee from the fund as a whole"). The common fund doctrine rests on the understanding that unnamed class members who benefit from the fund without contributing to it would be unjustly enriched if attorneys' fees were not paid out of the common fund. *Id*. Here, the efforts of Class Counsel have generated an approximately $2 million fund.

The Ninth Circuit "benchmark" for attorneys' fee awards is 25 percent of the common fund, but in practice, "in most common fund cases, the award exceeds that benchmark." *In re Omnivision Techs., Inc.*, 559 F. Supp. 2d 1036, 1047 (N.D. Cal. 2008); *In re Activision Sec. Litig.*, 723 F. Supp. 1373, 1377-78 (N.D. Cal. 1989) (surveying cases and stating "[t]his court's review of recent reported cases discloses that nearly all common fund awards range around 30%"); *Vedachalam v. Tata Consultancy Servs.*, Ltd., No. 06 CV 963, 2013 WL 3941319, at *2 (N.D.

Cal. July 18, 2013) (collecting cases awarding 30% or more and describing a 30% fee as "well within the usual range of percentages awarded"); *Craft v. Cty. of San Bernardino*, 624 F. Supp. 2d 1113, 1125 (C.D. Cal. 2008) (noting that "25% is substantially below the average class fund fee nationally"). Under the common fund doctrine, the Court should award at least 30% as attorney fees.

In awarding fees based on a percentage of a common fund, the factors to determine an appropriate fee are: (1) the result obtained for the Class; (2) counsel's efforts, experience, skill, and performance; (3) the complexity of the issues; (4) the risks of non-payment assumed by counsel; (5) the reaction of the class; and (6) non-monetary benefits. *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043, 1048-50 (9th Cir. 2002); *Six (6) Mexican Workers*, 904 F.2d at 1311. The first four factors strongly support Plaintiff's Counsel's fee as described above. *Supra* Part II.B-C. To date, no Class member has objected to the settlement or to Class Counsel's entitlement to fees. Barton Decl. ¶ 14. When as here the settlement provides significant non-monetary benefits for the Class, courts award even more than 30%. *See Harris v. Amgen Inc.*, No. CV075442PSGPLAX, 2017 WL 6048215, at *8 (C.D. Cal. Apr. 4, 2017) (awarding 45% common fund award reflecting non-monetary value of settlement).

IV. Plaintiff's Counsel's Cost Request Should be Approved

Courts can award "litigation costs reasonably incurred" under 18 U.S.C. § 2724(b)(3). Reasonable out-of-pocket litigation expenses are those that "would normally be charged to a fee paying client," *Trs. of the Const. Indus. and Laborers Health and Welfare Tr. v. Redland Ins. Co.*, 460 F.3d 1253, 1257 (9th Cir. 2006);

Plaintiff's counsel request reimbursement of a total of $55,459.12 in costs, which includes the following charges, all of which are recoverable in this Circuit: court fees, deposition costs, electronic research costs, electronic discovery expenses, process server fees, postage and courier fees, printing costs, conference call costs and travel/lodging. Barton Decl. ¶ 11; Jarrard Decl. ¶ 22; Sweetser Decl. ¶ 16.[8] These expenses were necessary to the successful prosecution of this case. Barton Decl. ¶ 11; Jarrard Decl. ¶ 22; Sweetser Decl. ¶ 16. Further, Plaintiff's counsel advanced these expenses without any guarantee that they would be recovered. Barton Decl. ¶ 12; Jarrard Decl. ¶ 22.

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[8] *See Harris v. Marhoefer*, 24 F.3d 16, 19-20 (9th Cir. 1994) (holding that "expenses related to discovery" are recoverable expenses); *Davis v. City & County of San Francisco*, 976 F.2d 1536, 1556 (9th Cir. 1992) (affirming that "out-of-pocket" expenses such as "travel, courier and copying costs" are reimbursable), *vacated in other part by* 984 F.2d 345, 345 (9th Cir. 1993); *In re: Cathode Ray Tube (CRT) Antitrust Litig.*, No. 07 CV 5944, 2016 WL 4126533, at *11 (N.D. Cal. Aug. 3, 2016) (approving recovery of costs including conference call expenses); *Gordon v. Virtumundo, Inc.*, No. 06 CV 204, 2007 WL 2253296, * 15 (W.D. Wash. Aug 1. 2007) (holding mediator fees a recoverable cost); *see also Redland Ins. Co.*, 460 F.3d at 1258-1259 (holding that "reasonable charges for computerized research may be recovered").

CONCLUSION

For the forgoing reasons, the Court should grant Plaintiff's motion for an order awarding attorneys' fees and litigation expenses to Class Counsel and Plaintiff's Counsel. [9]

[9] As Plaintiff's Counsel will incur additional time and expenses between now and the final approval, they will submit an updated summary prior to the final approval hearing and include the updated expense reimbursement request in the proposed final approval order.

Dated: February 24, 2020

Respectfully submitted,

/s/ Thomas G. Jarrard

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Attorneys for Plaintiff and the Class

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2020, I caused to be filed electronically a true copy of the foregoing document using the CM/ECF system which effected service of the same upon all counsel of record.

/s/ Thomas G. Jarrard
Thomas G. Jarrard

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JADE WILCOX, on behalf of herself and all others similarly situated, Plaintiffs, v. SWAPP LAW, PLLC, d/b/a CRAIG SWAPP AND ASSOCIATES, and JAMES CRAIG SWAPP, individually, Defendants	Case No. 2:17-cv-275-RMP Related to Case No. 2:17-cv-122-RMP **DECLARATION OF R. JOSEPH BARTON IN SUPPORT OF CLASS COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

I, R. Joseph Barton, declare under penalty of perjury of the laws of the United States as follows:

1. I am a partner at the law firm of Block & Leviton LLP, located at 1735 20th Street, Washington, D.C. 20009. I am co-counsel for Plaintiff in the

above-captioned matter. I am an active member of the Bars of the State of California and the District of Columbia and have been admitted to practice in this Court, *pro hac vice*. I am the partner in charge of overseeing this litigation at Block & Leviton.

2. As shown in the table below, the value of the professional services provided by Block & Leviton attorneys, paralegals and staff on behalf of the Class through February 24, 2020 (excepting time spent in the preparation of this motion) at current rates totals $988,771.50, and at historical rates totals $917,475.00. This value was arrived at by using what is commonly referred to as the "lodestar" methodology, which involves determining "the number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate." *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983)).

Name	2017 Rate	2018 Rate	2019 Rate	2020 Rate	Hours	Total (current rates)	Total (historical rates
Joe Barton (Partner)	$710	$750	$825	$875	451.3	$394,887.50	$342,059.50
Jason Leviton (Partner)	$725	$765	$825	$875	7.9	$6,912.50	$5,869.50
Thomas Kirchofer (Associate, J.D. '06)	$600				645.6	$401,349.00	$92,392.50
Matt Smith (Associate, J.D. '11)		$600			22.5	$14,625.00	$399,954.00
Colin Downes (Associate, J.D. '15)		$425	$450	$475	210.3	$99,892.50	$13,500.00
Ming Siegel (Paralegal, B.A. '16)	$225	$235	$250	$265	267.7	$70,940.50	$63,535.00
Total						$988,607.00	$917,310.50

3. The above totals represent the recorded hours charged in this case by Block & Leviton attorneys, paralegals and staff multiplied by the customary hourly rates charged by such attorneys and professionals in complex class action litigation such as this. My firm performed extensive work in this case that included litigating discovery motions, briefing and arguing Plaintiff's oppositions to Defendants' two motions to dismiss, briefing and arguing Plaintiff's motion for class certification, and taking the depositions pursuant to Rule 30(b)(6) of the Washington State Patrol, the Spokane Police Department, the Washington States Criminal Justice

Training Commission, and the Washington Department of Licensing. The complexity of factual issues related to the Washington State Patrol and other and other state law enforcement's policies and procedures in the creation, collection, and dissemination of police traffic collision reports made these litigation components contentious and demanding.

4. To litigate this case effectively, I assigned work to junior attorneys and paralegals with lower hourly rates as appropriate and also to the Sweetser firm, who did the same. My firm also closely coordinated with co-lead Class Counsel Thomas Jarrard to avoid unnecessary duplication of effort. Attorneys from only one of the two Class Counsel law firms appeared at any deposition, and many of the depositions were taken by then Block & Leviton associate, Thomas Kirchofer.

5. Prior to filing this motion for attorneys' fees, I and Colin Downes, an associate at Block & Leviton, reviewed the time records from my firm. Just as the Firm would prior to sending a bill to a paying client, Block & Leviton removed time entries for duplicative or unnecessary work that ordinarily would not be billed. The lodestar figure submitted to the Court reflects these adjustments.

6. My rate used in the preparation of the above is the same as the rates that I charge for other class work as well as for non-class work for fiduciaries and other third-parties for non-contingent work or hybrid hourly fee-contingency work. I have been hired at my then-hourly rates by sophisticated individuals, an

independent fiduciary of a ERISA-covered plan sponsored by a Fortune 100 company (where the company was paying the bill) and an insurer in defending fiduciaries who had been sued by the Department of Labor.

7. My then-hourly rates have been approved by numerous courts when awarding attorneys' fees in class action settlements, including in recent years. See e.*g.*, *Pfeifer v. Wawa*, Civ. No. 16-497, 2018 WL 4203880, *13 (finding rates between $235 and $910 per hour, including mine, reasonable given "skill and experience of the attorneys"); *Severstal Wheeling, Inc. v. WPN Corp.*, No. 10CIV954LTSGWG, 2016 WL 1611501, at *3-4 (S.D.N.Y. Apr. 21, 2016) (approving the following hourly rates of my prior firm, Cohen Milstein, including mine: $605-$665 for partners, $450-$550 for associates, and $240-$260 for paralegals and law clerks); *Chesemore v. All. Holdings, Inc.*, No. 09-CV-413-WMC, 2014 WL 4415919, at *6 (W.D. Wis. Sept. 5, 2014) (finding "current hourly rates ranging from $395 (for lower-level associates) to $895 (for highest-level partners)," including my rate, reasonable); *Tuten v. United Airlines, Inc.*, 41 F. Supp. 3d 1003, 1009 (D. Colo. 2014) (finding that "the rates charged by Class Counsel [which included my rate] are reasonable when compared to attorneys in the relevant markets"); *Slipchenko v. Brunel Energy, Inc.*, No. CIV.A. H-11-1465, 2015 WL 338358, at *19 (S.D. Tex. Jan. 23, 2015) (approving the billing rates of

my prior firm, Cohen Milstein (including mine) ranging from $415–$530 for associates to $635–$775 for partners").

8. At the time that I originally agreed to co-counsel this litigation, I was aware based on my prior experience handling complex class action litigation that such litigation could be expensive, hard-fought, and lengthy. Given the risky nature of DPPA litigation in general, I was aware that there was a significant likelihood that, after having invested a substantial amount of time and expense, the Court may decline to certify the class and either the Court or a jury might find on the merits against Plaintiff and the Class. In that event, that Plaintiff and the Class received nothing, then Class Counsel would receive no fees and would have lost whatever Class Counsel had invested in expenses.

9. Because of the significant amount of work that I and the other attorneys at my firm who worked in this matter, I and those other attorneys were prevented from working on or pursuing other matters.

10. Before representing Plaintiff in this action, I had no prior relationship with Jade Wilcox. I do not represent her in any other matters, and do not anticipate that I will in the future.

11. As shown in the table below, Block & Leviton has expended a total of $47,918.53 in necessary expenses in the litigation of this matter, which have been invoiced and recorded in our accounting system through February 24, 2020. These

expenses that we seek to recover in class action cases are the same types of expenses that we charge fee paying clients.

Type of Expense	**Amount**
Court Fees	$600.00
Deposition Transcripts	$15,417.60
Pacer	$117.30
Westlaw	$1,355.14
Electronic Discovery Platform	$10,441.86
Process Server Fees	$380.00
Postage and Courier Fees	$696.26
Printing Costs	$3,478.37
Telephone & Conference Calls	$43.97
Travel/Lodging	$15,388.03
Grand Total	**$47,918.53**

12. Block & Leviton advanced these expenses on a contingency basis, without any guarantee that they would be recovered.

13. I expect that Block & Leviton will incur additional attorneys' fees and out-of-pocket expenses between now and the fairness hearing, as well as further out-of-pocket expenses between final approval and the final distribution of the Settlement Fund. Prior to the final approval hearing, I will submit a supplemental declaration supporting those additional fees and expenses.

14. To date, Block & Leviton has not received any objections by any members of the Settlement Class to the Settlement or to the fees and expenses requested by Class Counsel (and the Settlement Administrator informed me last week that it had not received any objections).

15. Defendants have produced and Class Counsel have reviewed approximately 41,250 pages of documents in this case.

16. I first communicated a settlement offer to opposing counsel on May 11, 2018. Defendants did not respond to that demand until after the parties requested mediation with Judge Suko.

17. This case presented complicated legal issues in the unsettled area of interpretation of the DPPA. These included whether drivers' licenses and motor vehicle registrations are motor vehicle records for purposes of the DPPA and whether a plaintiff need show actual pecuniary harm in order to establish entitlement to liquidated damages. Furthermore, the complexity of factual issues relating to the WSP and other state law enforcement's policies and procedures in the creation, collection, and dissemination of PTCRs made these litigation components contentious and demanding.

18. Based on the Declaration of Barbara J. Duffy in *Hartford Casualty Ins. v. Swapp Law, PLLC*, Case No. 2:17-cv-01130 (D. Utah), I have identified comparator attorneys and paralegals employed by Defendants' counsel Lane Powell whose experience levels are similar to those of Block and Leviton LLP's professionals. The table below sets out an alternative attorneys fees calculation based on these rates:

Name	Lane Powell (Comparator) Rate	Hours	Total
Joe Barton (Partner)	$645 (B. Duffy)	451.3	$291,088.50
Jason Leviton (Partner)	$540 (R. McBride)	7.9	$4,226.50
Thomas Kirchofer (Associate, J.D. '06)	$450 (T. Washburn)	645.6	$290,520.00
Matt Smith (Associate, J.D. '11)	$450 (T. Washburn)	22.5	$10,125.00
Colin Downes (Associate, J.D. '15)	$330 (A. Schaer)	210.3	$65,193.00
Ming Siegel (Paralegal, B.A. '16)	$265[1]	267.7	$70,940.50
Total			**$736,339.00**

19. Attached are true and correct copies of the following documents:

Exhibit A: Excerpt of the Declaration of Barbara J. Duffy, *Hartford Casualty Ins. v. Swapp Law, PLLC*, Case No. 2:17-cv-01130 (D. Utah) (ECF No. 42-2), accessed via PACER Feb. 22, 2020.

Exhibit B: Itemized time entries for professionals affiliated with Block & Leviton LLP calculated at historical rates.

Exhibit C: Itemized time entries for professionals affiliated with Block & Leviton LLP calculated at current rates.

The foregoing is true and correct to the best of my knowledge and belief.

Executed this 24th day of February 2020 in Washington, D.C.

R. Joseph Barton

[1] Ms. Siegel's billing rates are below that of any paralegal Lane Powell staffed to this case.

Exhibit A

Declaration of Barbara J. Duffy

I, Barbara J. Duffy, hereby declare as follows:

1. I am a shareholder-attorney in the law firm of Lane Powell PC, 1420 Fifth Avenue, Suite 4200, Seattle, Washington 98101-2375. A copy of my CV is attached hereto as Exhibit 1. I chair Lane Powell's Litigation Department. In my nearly 30 years of practice, (roughly twenty five of which at Lane Powell) , I have represented clients in all aspects of class action litigation, including wage & hour class and collective actions, consumer based class actions and ERISA class actions in state and federal courts around the country. My firm and I have tried to verdict collective and class actions in various jurisdictions including the Eastern District of Washington.

2. Lane Powell was retained to represent Swapp Law, PLLC and James Craig Swapp ("Swapp") in the case of *Wilcox et al. v. Swapp Law PLLC et al.,* Case No. 2:21CV275 (E.D. Wash.) ("Wilcox Lawsuit"), a putative class action seeking damages on behalf of thousands of claimants for alleged wrongful conduct occurring over a period of 4 years. Plaintiff's claim for damages exceeds $44 million. This amount is exclusive of Plaintiff's claim for punitive damages.

3. Class actions are complex by nature and involve complicated and fact intensive legal issues with a substantial amount of complex pretrial motion work. The sheer number of potential claimants significantly expand the scope of work. The liability amounts at stake are usually in the millions of dollars. All of these factors are present in the Wilcox Lawsuit.

4. I have had extensive experience with and specialize in the defense of class actions, such as the Wilcox Lawsuit in cases around the country. Mr. McBride and I have also been approved as class counsel in a matter pending in the Northern District of Illinois.

5. Lane Powell's engagement agreement with the Swapp firm was executed on August 17, 2017. A copy of the engagement agreement is attached as Exhibit 2. Immediately after our

engagement we investigated the factual and legal allegations in the complaint and prepared a motion to dismiss. We fully briefed the motion and argued it before the trial Court. The motion was denied and discovery commenced immediately. On February 2, 2018, our clients were served with Requests for Admission and Requests for Production. Later that month they were served with Interrogatories. The discovery requests were comprehensive and required an extensive review and later production of tens of thousands of documents including the review of over 60,000 electronically stored documents.

6. On February 2, 2018, attorney Rich Humpherys, representing Swapp with respect to any insurance coverage matters, wrote to Hartford and provided the rates charged by attorneys from Lane Powell doing most of the work on the case at this time, Barbara J. Duffy, Ryan McBride, and Aaron Schaer. Mr. Humpherys wrote:

> I understand from the insured's defense counsel (Barbara Duffy) that you have contacted Ms. Duffy and indicated that Hartford's rates for this kind of work is $250/hr., which is only a fraction of her rate. The rates of Lane Powell for the defense of class action lawsuits are: Barbara Duffy $645/hr.; Ryan McBride $540/hr. and A. Schaer $310/hr., which rates are quite reasonable for this geographical area and specialized practice of law. Ms. Duffy has been defending the Wilcox claims from the outset. She and her team are extremely and uniquely qualified to defend class actions.... The claims in this case potentially involve millions of dollars and could have a major and long lasting adverse impact on the insured's business. The Wilcox claims must therefore be properly and adequately defended by expert attorneys who specialize and who are experienced in this area, whose rates are typically equal to or greater than the rates of Lane Powell. Expert defense counsel will not only serve the best interest of the insured, but also the best interests of Hartford which may be required to pay any resulting exposure from the claims.

A copy of this letter is attached as Exhibit 3.

7. On February 19, 2018, Melissa Siggia, who is ostensibly addressing only the claim against Swapp, not the dispute concerning whether the claim is covered, responded on behalf of

Hartford, accepting the rates charged by Ms. Duffy ($645/hour) and Mr. McBride ($540/hour). A copy of this email is attached as Exhibit 4. Thinking "Aaron Schaer" was a paralegal, Ms. Siggia said he would be paid "at a paralegal rate of $100 per hour." Mr. Schaer was not a paralegal. At the time he performed work on the case he was an associate. Mr. Schaer later took leave of our firm to clerk with the Honorable James A. Robart, first for a temporary assignment, then for a full year. He will return to our firm in 2019. A copy of Mr. Schaer's resume and bio when he was working with our firm is attached as Exhibit 5.

8. On February 19, 2018, I emailed Ms. Siggia to identify which associate attorneys and paralegals would do most of the work on the case, in addition to myself and Ryan McBride. These were Kristin Beneski, Devon McCurdy, Aaron Schaer, and Sue Reich. Sue is a paralegal. Since then, Taylor Washburn joined our team. The resumes of the associates are attached as Exhibit 6 and at the time were available on our website. "We need to address the rates for these other timekeepers," I wrote. A copy of this email is attached, see Exhibit 4.

9. A week later I wrote again. "What is our next step on addressing the other timekeeper rates?" Id.

10. On March 13, 2018, now seven months after the complaint in the Wilcox Lawsuit was filed, I wrote Ms. Siggia again: "We also need our rates approved and you have only approved two timekeepers." A copy of this email is attached as Exhibit 7.

11. On March 14, 2018, Ms. Siggia wrote that Hartford had "approved rates for two timekeepers" that was Mr. McBride and myself. But rather than agreeing to pay "reasonable rates" as Hartford had agreed with Swapp, Hartford said that "other timekeepers," regardless of their skill or years in practice, "should bill at our previously identified rates of $195 per hour for

associates and $100 for paralegals." Id. As is evident in my email, Lane Powell never agreed to those rates.

12. Written Discovery. As described in paragraph 5 above, before the Hartford finally responded to Mr. Humphreys, our clients were served with Requests for Admission and Requests for Production. Later that month they were served with Interrogatories. Plaintiff has been aggressive, refusing even a modest request for additional time to respond to that discovery. In addition to the discovery we responded to, Defendants served plaintiff with written discovery and was forced to engage in a number of meet and confer conferences to get even modest responses. Lane Powell has spent thousands of hours in discovery and other related legal matters, which have required many attorneys involvement in my law firm, including myself, Ryan McBride, Kristin Beneski, Devon McCurdy, Taylor Washburn and Sue Reich.

13. Document Production. As described in paragraph 5, the document production has been massive and is not over yet.

14. Deposition Discovery. Through the summer we have participated in seven 30(b)(6) depositions of third party witnesses. These depositions required extensive preparation and the transcripts of such were used extensively in opposition to the motion to certify the class discussed below. Additionally, we prepared for and took the deposition of Ms. Wilcox, the transcript of which was very helpful in our opposition to the Motion to Certify.

15. Motion Practice. Plaintiff has filed two motions to compel which we briefed and argued. An amended complaint and a motion to certify the class. Defendants have opposed the motion to certify and filed a motion to dismiss the amended complaint and a motion to compel. Defendants have also brought their own motion to compel.

16. A true and correct copy of 5 of the last 7 Lane Powel invoices are attached as Exhibit 8. The last two of our invoices are pending payment with the Hartford. As the supervising attorney, with active involvement in all aspects of this case, I am familiar with all of the hours and scope of work done as described in each invoice. All of this work was necessary and reasonably incurred to properly represent and defend Swapp in the Wilcox Lawsuit. Because the case is ongoing, it would be prejudicial to file unredacted copies with the court. The Hartford has received unredacted copies of all others. For purposes of this motion, we have focused on 5 of the last 7 invoices where the vast short pays as described below have been incurred.

17. I am familiar with the hourly billing rates charged by attorneys in this area of practice. I have knowledge of hourly rates approved by courts in this jurisdiction for work similar to our work in the Wilcox Lawsuit. The hourly rates and the time billed in the attached invoices are reasonable and customary for this area of practice relating to the Wilcox Lawsuit. The rates we are charging on this matter are our standard rates (except Taylor).

18. The lowest associate rate at Lane Powell is $275/hour. The highest rate is $470/hr. The lowest paralegal rate is $195/hour. The highest rate is $330/hr. The rates charged at Lane Powell for associates and paralegals are reasonable and customary for a firm of its size and location working on a complicated class action case.

19. Attorney Aaron Schaer has billed 8.7 hours. His ordinary rate is $330/hour. The Hartford has paid $195/hour for his time for a total shortfall of $1,174.50. See spreadsheet attached as Exhibit 9.

20. Paralegal Barbara Schmidt has billed 98.3 hours. Her ordinary rate is $295/hour. The Hartford has paid $100/hour for her time for a total shortfall of $19,168.50. Id.

21. Attorney Devin McCurdy has billed 185.9 hours. His ordinary rate is $310/hour. The Hartford has paid $195/hour for his time for a total shortfall of $21,378.50. Id.

22. Attorney Kristin Beneski has billed 183 hours. Her ordinary rate is $415/hour. The Hartford has paid $195/hour for a shortfall of $40,260.00. Id.

23. Attorney Taylor Washburn has billed 89.7 hours. We are billing his time at a discounted rate of $450/hour. His standard rate is $470. The Hartford has paid $195/hour for a shortfall of $22,873.50. Id.

24. Paralegal Sue Reich has billed 281.9 hours. Her ordinary rate is $300/hour. The Hartford has paid $100/hour for her time for a total shortfall of $56,380.00. Id.

25. In short, Hartford has refused to pay the reasonable rates charged by these attorneys and paralegals, unilaterally deciding instead to pay only $195/hour for all associates and $100/hour for all paralegals, regardless of their experience. The result is that Lane Powell has unpaid fees in the amount of $161,235.00.

26. In addition to its failure to pay reasonable rates for the defense of this complex potentially devastating lawsuit, The Hartford has short paid our invoices in the amount of $80,715.48 for alleged failure to abide by its billing requirements. We are appealing those determinations. In all of the five invoices processed by The Hartford, it has paid $476,043.37 or 66.29% of the total amounts owed.

27. These rates are reasonable and consistent with rates charged by similar law firms for this type of lawsuit.

I declare under criminal penalty of the State of Utah and applicable federal laws that the above is true and correct to the best of my knowledge, understanding and belief.

Barbara J. Duffy

EXHIBIT 1

LANE POWELL

Barbara

Barbara J. Duffy
Shareholder
Litigation Department Director;
Commercial Litigation Team Co-Chair

Seattle
D 206.223.7944 C 206.612.2576
duffyb@lanepowell.com

Barbara Duffy has extensive experience representing clients in complex commercial litigation, health care and regulatory disputes, and class actions. She serves as the Director of Lane Powell's Litigation Department firm-wide and Co-Chairs the firm's Commercial Litigation Team.

Barb has tried bench and jury trials in state and federal courts and has extensive experience with arbitration proceedings. She regularly advises national and local clients on matters related to False Claims Act, qui tam, investigations and class action defense strategies.

In 2004, Barb saw an opportunity to develop a cross functional team to meet the legal needs of the senior living and long term care industry. Under her leadership, the firm has become recognized as a top tier provider of legal counsel for providers in this industry. As part of her ongoing commitment to the health care industry, Barb serves as Chair of the American Health Care Association's Legal Committee. Barb's practice is complex commercial litigation with an emphasis on regulatory and health care disputes.

As a senior litigator and legal advisor, Barb has learned that in addition to providing clients with the best possible legal and business advice, the keys for a successful relationship are responsiveness, clear communication and excellent client service. She excels at keeping clients informed and empowered.

Barb has been recognized as a leader in litigation by *Best Lawyers®* and *Chambers® USA* multiple times, and is AV Preeminent® rated by Martindale-Hubbell®.

Practices & Industries

Class Actions
Commercial Litigation
ERISA, Life, Health & Disability
Senior Living & Long Term Care
Wage & Hour
Class Action Readiness Panel

Education

University of Minnesota, J.D., *cum laude*, 1989

- Phi Beta Kappa
- Phi Kappa Phi
- Golden Key National Honor Society

University of Minnesota, B.A., 1985

Admissions

Washington
U.S. District Court, Eastern and Western Districts of Washington
U.S. Court of Appeals, Ninth Circuit

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LANE POWELL

Barbara J. Duffy

Honors

Chambers® USA: America's Leading Lawyers for Business, General: Commercial Litigation (2018)

"Seattle Lawyer of the Year," *Best Lawyers®*, Long Term Care and Seniors Housing (2014)

"Top 250 Women in Litigation," *Benchmark Litigation* (2012-2018)

"Local Litigation Star," *Benchmark Litigation*, Commercial Litigation (2011-2019)

The Best Lawyers in America©, Commercial Litigation, Health Care, Long Term Care and Seniors Housing (2010-2019)

"Washington Super Lawyer," Thomson Reuters, Business Litigation (2004-2005, 2007-2018)

"Top 50 Women Attorneys in Washington," Thomson Reuters (2008, 2011)

AV Preeminent® in Martindale-Hubbell® Peer Review Ratings™

LinkedIn

https://www.linkedin.com/in/barbduffy/

Professional Experience

Member, Lane Powell Board of Directors

Community Involvement

Member, American Health Lawyers Association (AHLA)

- Program Committee for Long Term Care and the Law
- Former Chair, Long Term Care, Senior Housing, In-Home Care, and Rehabilitation Practice Group

General Counsel, Washington Health Care Association (WHCA)

Chair, American Health Care Association Legal Committee (AHCA)

Member, Oregon Health Care Association

Former President, Friends of Seattle Public Library Board

Thought Leadership

October 12, 2018 | News

Lane Powell Highly Recommended in *Benchmark Litigation* 2019

Awards & Honors

August 15, 2018 | News

The Best Lawyers in America© 2019 Recognizes 62 Lane Powell Attorneys

Awards & Honors

August 1, 2018 | News

Lane Powell Attorneys Recognized as 'Top 250 Women in Litigation' and on '40 & Under Hot List' for 2018 by *Benchmark Litigation*

Awards & Honors

June 18, 2018 | News

Thirty-two Lane Powell Attorneys Named 'Washington Super Lawyers' and 14 Named 'Washington Rising Stars'

Awards & Honors

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LANE POWELL

Barbara J. Duffy

May 3, 2018 | News

Lane Powell Again Ranked Among Top Firms in 2018 *Chambers® USA*
Awards & Honors

October 26, 2017 | News

Lane Powell Highly Recommended in *Benchmark Litigation* 2018
Awards & Honors

August 15, 2017 | News

Fifty-nine Lane Powell Attorneys Named in *The Best Lawyers® in America* 2018
Awards & Honors

August 1, 2017 | News

Lane Powell Attorneys Recognized as 'Top 250 Women in Litigation' and on 'Under 40 Hot List' for 2017 by *Benchmark Litigation*
Awards & Honors

June 9, 2017 | News

Thirty-one Lane Powell Attorneys Named 'Washington Super Lawyers' and 16 Named 'Washington Rising Stars'
Awards & Honors

May 30, 2017 | News

Chambers® USA Recommends Lane Powell in Multiple Categories for 2017
Awards & Honors

May 23, 2017 | Event / CLE

The Requirements of Participation — What You Need to Know Now
Washington Health Care Association | Tacoma, Washington

March 26, 2017 | Event / CLE

CMS Final Rule: Reform of Requirement for Long Term Care Facilities
Health Care Compliance Association | National Harbor, Maryland

January 31, 2017 | Event / CLE

American Seniors Housing Association 2017 Annual Meeting
American Seniors Housing Association | Palm Springs, California

October 20, 2016 | News

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Lane Powell Highly Recommended in *Benchmark Litigation 2017*
Awards & Honors

August 17, 2016 | News

Fifty-one Lane Powell Attorneys Named in *The Best Lawyers in America*® 2017
Awards & Honors

June 21, 2016 | News

Duffy, Mautner and Payton Named 2016 'Top 250 Women in Litigation' by *Benchmark Litigation*
Awards & Honors

June 10, 2016 | News

Thirty-one Lane Powell Attorneys Named 'Washington Super Lawyers' and 18 Named 'Washington Rising Stars'
Awards & Honors

May 27, 2016 | News

Chambers® *USA* Recommends Lane Powell in Multiple Categories for 2016
Awards & Honors

April 17, 2016 | Event / CLE

Long Term Care: The Mystery of Repayment
Health Care Compliance Association | Las Vegas, Nevada

April 7, 2016 | News

Malkin Joins Lane Powell's Litigation Department
Firm Announcement

November 4, 2015 | News

Duffy Reappointed as Chair of the American Health Care Association Legal Committee
Awards & Honors

October 27, 2015 | News

Lane Powell Highly Recommended in 2016 *Benchmark Litigation*

August 17, 2015 | News

Forty-eight Lane Powell Attorneys Named in *The Best Lawyers in America*® 2016

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LANE POWELL

Barbara J. Duffy

Awards & Honors

June 19, 2015 | News

Duffy, Mautner and Payton Named as 2015 'Top 250 Women in Litigation' by *Benchmark Litigation*

June 12, 2015 | News

Thirty-two Lane Powell Attorneys Named 'Washington Super Lawyers' and 11 Named as 'Washington Rising Stars'

Awards & Honors

April 20, 2015 | Event / CLE

Reportable Events and the Role of the Compliance Officer

Health Care Compliance Association | Lake Buena Vista, Florida

January 30, 2015 | Event / CLE

Defending Against Plaintiffs' Firms' Latest Practices Under the False Claims Act

Preventing and Defending Long Term Care Litigation | Miami, Florida

December 4, 2014 | Event / CLE

How AHCA's Legal Committee Serves State Affiliates

American Health Care Association | Dallas, Texas

October 20, 2014 | News

Eleven Lane Powell Attorneys Recognized as "Litigation Stars;" Two Named as "Future Stars" in 2015 *Benchmark Litigation* Legal Guide

August 18, 2014 | News

Fifty-One Lane Powell Attorneys Named in *The Best Lawyers in America*® 2015

Awards & Honors

June 13, 2014 | News

Thirty-five Lane Powell Attorneys Named 'Washington Super Lawyers' and Fifteen Named as 'Washington Rising Stars'

Awards & Honors

March 31, 2014 | Event / CLE

Inside Counsel, Outside Counsel, General Counsel: How Should a Compliance Officer Conduct an Investigation?

Health Care Compliance Association

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LANE POWELL

Barbara J. Duffy

February 20, 2014 | Publication

Meet the Monitors

American Health Lawyers Association

June 14, 2013 | News

Thirty-Six Lane Powell Attorneys Named 'Washington Super Lawyers' and Sixteen Named as 'Washington Rising Stars'

Awards & Honors

June 13, 2012 | News

28 Lane Powell Attorneys Named 'Washington Super Lawyers;' 12 Named as 'Washington Rising Stars'

Awards & Honors

August 9, 2011 | News

Thirty-six Lane Powell Attorneys Listed as Top Lawyers in *Seattle Metropolitan* Magazine

Awards & Honors

June 20, 2011 | News

Twenty-six Lane Powell Attorneys Named 'Washington Super Lawyers;' Ten Lane Powell Attorneys Named As 'Washington Rising Stars'

Awards & Honors

June 7, 2011 | News

Lane Powell Hosts Professional Delegate From France

Firm Announcement

July 20, 2010 | News

58 Lane Powell Attorneys Listed as Top Lawyers in *Seattle Metropolitan* Magazine

Awards & Honors

June 6, 2010 | News

28 Lane Powell Attorneys Named Washington Super Lawyers 2010

Awards & Honors

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EXHIBIT 2

LANE POWELL

BARBARA J. DUFFY
206.223.7944
duffyb@lanepowell.com

August 17, 2017

PRIVILEGED AND CONFIDENTIAL

VIA ELECTRONIC MAIL

J. Craig Swapp
Craig Swapp & Associates
16201 E Indiana Ave. Suite 1900
Spokane Valley, WA 99216

Re: Engagement Letter

Dear Craig:

Thank you for engaging Lane Powell PC to represent Swapp Law, PLLC dba Craig Swapp and Associates and you individually in connection with the litigation entitled *Jade Wilcox et al. v. Swapp Law et al.*, in U.S. District Court Eastern District of Washington Case No. 17-cv-275-RMP ("the Litigation"). We look forward to working with you on the matter.

Terms of Engagement. The terms specified in this letter and the attached statement of standard terms shall constitute the terms of our engagement. Please review them carefully and let me know if you have any questions about them. Unless otherwise agreed, these terms of engagement shall apply not only to the present matter but, except for the scope of our current engagement, also to any future matters in which we represent you.

Scope of Engagement. The scope of our current engagement shall be limited to the Litigation and shall not extend to any other matters unless we have agreed to them in writing.

Responsibility. I will be personally responsible to you for the legal work performed under our current engagement. But, unless you request a right to approve any delegation of work, I may assign work to another Lane Powell attorney or paralegal reasonably suited to perform it with the goal of providing the most cost-effective and highest quality legal services for you. If you have any questions or concerns about our staffing or provision of services to you, please do not hesitate to contact me or, if you prefer, our President, Charles W. Riley Jr. at 206.223.7959.

Legal Fees. Unless otherwise agreed in writing, you will pay us legal fees for the legal work we perform based on the hourly rates of the attorneys and other timekeepers who perform the work. These hourly rates are revised from time to time, usually at the beginning of each year, with changes reflected in the following month's billing statement. My current hourly rate for this engagement is $645. Other attorneys who may be involved in this engagement include associate attorney hourly rates between $300 and $450. Rates for attorneys in the firm currently range from $300 to $740 per hour, while the rates for paralegals currently range from $200 to $300 per hour.

Costs and Disbursements. You will also pay or reimburse us for internal costs incurred and disbursements made on your behalf. These may include such items as postage, overnight courier services, in-house and outside messenger deliveries, conference telephone charges, facsimiles, photocopies, document scanning, travel expenses, filing fees, witness fees, service of process and use of other service providers, such as consulting experts, local counsel and court reporters. We will bill you at cost for charges paid to third party service providers and at our usual and customary rates for internal services. Invoices for the fees and expenses of third party professionals or service providers (such as consulting experts, local counsel and court reporters) will normally be billed directly to you or forwarded to you for direct payment, unless we agree separately to other arrangements.

Invoices. As more fully explained in the attached statement of standard terms, we will bill you monthly with payment due upon receipt. Unless otherwise agreed, bills not paid within thirty (30) days shall accrue interest at a rate of nine percent (9%) per annum. If any invoice remains unpaid for more than sixty (60) days, we may, consistent with our ethical obligations, cease performing legal services for you until you make satisfactory arrangements to pay us.

Deposits. Our policy is to ask clients to deposit a retainer with us, from time to time, to secure at least a portion of the costs we expect to incur and the value of work we expect to perform on their behalf. For purposes of our current engagement, we have agreed that you will pay us a retainer of $15,000.00 at the commencement of our engagement. You hereby grant us a security interest in any retainer you deposit with us and in any funds we hold on your behalf to secure your obligations to us. Deposits that are received to cover specific items will be disbursed as provided in our agreement with you, and you will be notified when amounts are applied or withdrawn. Except for such specific disbursements, the retainer will normally be credited toward your unpaid invoices, if any, at the conclusion of services and any remaining balance will be returned to you. But, we reserve the right to apply the retainer to any delinquent invoice at any time. If the retainer is insufficient to cover current fees and costs, it may have to be increased.

Termination of Engagement. Either of us may terminate the engagement at any time for any reason by written notice, subject on our part to our obligations under applicable rules of professional conduct. Unless previously terminated, our engagement on this matter will terminate when we send you our final statement for services rendered on this matter. Unless you engage us on other matters, we will have no continuing obligation after the conclusion of this matter to advise you with respect to future legal developments, such as changes in the applicable laws or regulations, that could have an impact on your future rights and liabilities.

Confidentiality and Document Retention. Both before and after termination of our engagement, we will preserve the confidentiality of any non-public information you have given us in accordance with applicable rules of professional conduct and, at your request, we will return the original records that you have provided to us and the original records that we have created for you. If you request additional materials or a copy of your entire file, you agree to pay our reasonable copying expenses. Materials associated with this matter that are not returned may be destroyed in accordance with our document retention policy.

Acceptance. If these terms of engagement are acceptable to you, please sign a copy of this letter in the space provided below and return the signed copy to me at your earliest convenience. If you

do not return a signed copy of this letter or object to it within five (5) business days after your receipt of the letter, or if you ask us to start work on the engagement before you have returned a signed copy of this letter, these terms of engagement shall govern our engagement.

We appreciate your choice of Lane Powell PC to serve your legal needs. As in every engagement we undertake, our goal is to understand your needs, provide the highest quality service and exceed your expectations. We welcome discussion of all terms of engagement at any time and encourage you to tell us about how best to serve you. Should you ever have any questions about any aspect of our engagement, please do not hesitate to contact me.

Sincerely,

LANE POWELL PC

Barbara Duffy

Barbara J. Duffy

Acceptance and Acknowledgment

Swapp Law PLLC dba Craig Swapp and Associates; James Craig Swapp, by its MEMBER / MANAGER, agrees to the terms of engagement contained in the foregoing engagement letter and the attached statement of standard terms.

SWAPP LAW PLLC dba CRAIG SWAPP AND ASSOCIATES; JAMES CRAIG SWAPP

By: _____ Date: 8/22/2017

J. Craig Swapp

Title: MEMBER / MANAGER

999999.0040/7048007.1

EXHIBIT 3

HUMPHERYS LAW

ATTORNEY AT LAW | L. RICH HUMPHERYS

February 2, 2018

Via Email

Melissa T. Siggia
Sr. Home Office Claims consultant
The Hartford
Melissa.siggia@thehartford.com

Paul Gosselin
Claim Consultant
The Hartford
Paul.gosselin@thehartford.com

Re:	Policy Holder:	Swapp Law, PLLC
	Insurer:	Hartford Casualty Ins Co
	Policy No:	34 SBA PF 6578
	Claim No:	Y53 LP 48104
	Complaints:	Wilcox et al v. Swapp Law et al

Dear Ms. Siggia and Mr. Gosselin:

As I have previously stated in prior correspondence, I represent your insured Swapp Law, et al, in the above matter. In my letter of January 17, 2018, I requested that Hartford pay for the defense of the underlying action and sent invoices to you for reimbursement. I have not had a response to this correspondence.

I understand from the insured's defense counsel (Barbara Duffy) that you have contacted Ms. Duffy and indicated that Hartford's rates for this kind of work is $250/hr., which is only a fraction of her rate. The rates of Lane Powell for the defense of class action lawsuits are: Barbara Duffy $645/hr.; Ryan McBride $540/hr. and A Schaer 310/hr., which rates are quite reasonable for this geographical area and specialized practice of law.

Ms. Duffy has been defending the Wilcox claims from the outset. She and her team are extremely and uniquely qualified to defend class actions. The defense of class actions is a highly specialized area of the law, requiring specialized education, training and experience. This is not a run-of-the-mill defense case where regularly retained insurance defense counsel (who may work at discount rates) can adequately handle. Any "Standard" rates approved by Hartford are not the standard for this kind of work. Hartford's standard rates would only allow inexperienced and/or nonspecialized counsel, which would put the insured and Hartford at greater risk. The claims in this

36 South State St, Suite 1900 | Salt Lake City, UT 84111 | (801) 239-3170 | lrhumpherys@gmail.com

case potentially involve millions of dollars and could have a major and long lasting adverse impact on the insured's business. The Wilcox claims must therefore be properly and adequately defended by expert attorneys who specialize and who are experienced in this area, whose rates are typically equal to or greater that the rates of Lane Powell. Expert defense counsel will not only serve the best interest of the insured, but also the best interests of Hartford which may be required to pay any resulting exposure from the claims.

It is Hartford's expressed and implied good faith duty under the insurance policy to provide a proper and adequate defense to the Wilcox claims. This is especially important since Hartford is taking the position that there is no coverage to the insured, leaving the insured to potentially pay 100% of any exposure.

The insurance defense counsel that Hartford would typically retain at its "standard" discount rates would not only lack the expertise and adequate experience in this area, but they would likewise have a conflict of interest, being regularly retained by Hartford. This is particularly problematic because Hartford is defending under a reservation of rights. Regularly retained defense counsel will take the position that they cannot get involved in coverage issues, which is a correct position since otherwise, they would have a direct conflict of interest.

The issue isn't whether Swapp is just being defended, it's whether Swapp is being defended by an attorney who is truly independent and has no ties with Hartford. The independence of defense counsel is critical since part of defending the Wilcox claim must include a defense strategy that would lead to coverage as opposed to non-coverage. An independent attorney who is truly looking after the best interest of Swapp would have the **coverage issues directly in mind** when making strategy decisions and addressing discovery, evaluations, analysis, motions, settlement, and other matters of the case. If Hartford's defense counsel is taking the approach of being indifferent or blind folded as to coverage, then the conflict is material and will result in direct prejudice to Swapp.

Swapp hereby demands that Hartford fully reimburse Swapp for the amounts it has paid Lane Powell (as provided in my prior letter) and agree to pay the rates of Lane Powell without any discount.

I again reiterate Swapp's request that Hartford remit to my attention a check issued to Swapp Law for the full amount of $38,250.15 for Swapp Law's payment of the above invoices and confirm with Lane Powell (copy to me) that it will pay its rates as stated above.

Very truly,

L. Rich Humpherys

L. Rich Humpherys

cc. Craig Swapp
Barbara Duffy
Christopher Frost (CFrost@maynardcooper.com)

EXHIBIT 4

From: Siggia, Melissa T (Liab + Finl Products Claims)
To: Duffy, Barbara
Subject: RE: Wilcox v Swapp v Hartford [CONFIDENTIAL] [HFSG-LLOSS.FID68085]
Date: Tuesday, March 13, 2018 8:05:11 AM
Attachments: image004.jpg
image005.jpg
image006.png
image007.png

Hi Barb,

I am available the remainder of the week except for Friday. Please let me know your availability.

Thanks,
Melissa

Melissa Siggia
Senior Home Office Consultant, MCU-Liability Claims

The Hartford Financial Services Group, Inc.
One Hartford Plaza , T-16
Hartford, Connecticut 06155
T: 860-547-4665
F: 888-326-2701
melissa.siggia@thehartford.com
www.thehartford.com
www.facebook.com/thehartford
www.twitter.com/thehartford

From: Duffy, Barbara [mailto:DuffyB@LanePowell.com]
Sent: Monday, March 05, 2018 8:17 PM
To: Siggia, Melissa T (Liab + Finl Products Claims); L Rich Humpherys; Gosselin, Paul J (Liab + Finl Products Claims)
Cc: 'Craig Swapp'; cfrost@maynardcooper.com; McBride, Ryan P.; Duffy, Barbara
Subject: RE: Wilcox v Swapp v Hartford [CONFIDENTIAL] [HFSG-LLOSS.FID68083]

Melissa,

Could we please set up a time to talk? We are also using Discovia as our eDiscovery vendor and will forward those invoices to you. I will be sending you our bill for February time this week.

Barb

BARBARA J. DUFFY
Shareholder Bio | vCard
Litigation Department Director
duffyb@lanepowell.com
D 206.223.7944 **C** 206.612.2576
LANEPOWELL.COM

From: Duffy, Barbara
Sent: Monday, February 26, 2018 2:06 PM
To: 'Siggia, Melissa T (Liab + Finl Products Claims)' <melissa.siggia@thehartford.com>; 'L Rich Humpherys' <lrhumpherys@gmail.com>; 'Gosselin, Paul J (Liab + Finl Products Claims)' <Paul.Gosselin@thehartford.com>
Cc: 'Craig Swapp' <craig@craigswapp.com>; 'cfrost@maynardcooper.com' <cfrost@maynardcooper.com>; McBride, Ryan P. <McBrideR@LanePowell.com>
Subject: RE: Wilcox v Swapp v Hartford [CONFIDENTIAL] [HFSG-LLOSS.FID68083]

Melissa,

What is our next step on addressing the other timekeeper rates?

BARBARA J. DUFFY
Shareholder Bio | vCard
Litigation Department Director
duffyb@lanepowell.com
D 206.223.7944 **C** 206.612.2576
LANEPOWELL.COM

From: Duffy, Barbara
Sent: Monday, February 19, 2018 9:24 AM
To: 'Siggia, Melissa T (Liab + Finl Products Claims)' <melissa.siggia@thehartford.com>; L Rich Humpherys <lrhumpherys@gmail.com>; Gosselin, Paul J (Liab + Finl Products Claims) <Paul.Gosselin@thehartford.com>
Cc: 'Craig Swapp' <craig@craigswapp.com>; cfrost@maynardcooper.com; McBride, Ryan P. <McBrideR@LanePowell.com>
Subject: RE: Wilcox v Swapp v Hartford [CONFIDENTIAL] [HFSG-LLOSS.FID68083]

Melissa,

Attached is our most recent bill. There has been a substantial request for electronic discovery and we need to involve our eDiscovery experts and associates to keep costs down. You will see we are including Kristin Beneski (eDiscovery associate), Devon McCurdy, junior associate to assist with

document review and discovery and paralegal Sue Reich (eDiscovery paralegal). Aaron Schaer was selected for a brief clerkship with the Honorable James L. Robart here in the Western District Federal Court. He will be back in April, but we believe we have our core team, but case needs may require some changes. We need to address the rates for these other timekeepers.

Barb

BARBARA J. DUFFY
Shareholder Bio | vCard
Litigation Department Director
duffyb@lanepowell.com
D 206.223.7944 **C** 206.612.2576
LANEPOWELL.COM

From: Siggia, Melissa T (Liab + Finl Products Claims) [mailto:melissa.siggia@thehartford.com]
Sent: Monday, February 19, 2018 8:52 AM
To: L Rich Humpherys <lrhumpherys@gmail.com>; Gosselin, Paul J (Liab + Finl Products Claims) <Paul.Gosselin@thehartford.com>
Cc: Duffy, Barbara <DuffyB@LanePowell.com>; 'Craig Swapp' <craig@craigswapp.com>; cfrost@maynardcooper.com
Subject: RE: Wilcox v Swapp v Hartford [CONFIDENTIAL] [HFSG-LLOSS.FID68083]

Mr. Humpherys:

While not required to do so, Hartford will make an accommodation on this one case only to accept the current rates billed by Lane Powell as follows: (Barbara Duffy at $645/hr; Ryan McBride at $540/hr) However, A Schaer is not listed as an attorney on the firm's web site and will be approved at a paralegal rate of $100 per hour. This accommodation is not an indication of treatment on future claims or engagements of the firm. I ask, however, that Lane Powell follow our billing and reporting guidelines which can be accessed by clicking this link www.thehartford.com/panelcounsel.

If Lane Powell has access to bill electronically through Bottomline Legal Exchange, the firm will be required to do so. If not, please forward one email with all invoices to date and I will submit them to our billing department to be uploaded and reviewed. I will need a current W-9 in order to set up Lane Powell in our vendor system, so kindly forward one for my file.

Please let me know if there are any questions on how to submit invoices.

Sincerely,
Melissa

Melissa Siggia

Senior Home Office Consultant, MCU-Liability
Claims

The Hartford Financial Services Group, Inc.
One Hartford Plaza , T-16
Hartford, Connecticut 06155
T: 860-547-4665
F: 888-326-2701
melissa.siggia@thehartford.com
www.thehartford.com
www.facebook.com/thehartford
www.twitter.com/thehartford

From: L Rich Humpherys [mailto:lrhumpherys@gmail.com]
Sent: Tuesday, February 13, 2018 5:19 PM
To: Siggia, Melissa T (Liab + Finl Products Claims); Gosselin, Paul J (Liab + Finl Products Claims)
Cc: duffyb@lanepowell.com; 'Craig Swapp'; cfrost@maynardcooper.com
Subject: RE: Wilcox v Swapp v Hartford

Dear Ms. Siggia and Gosselin:

I have had no response to my letter sent with the email below. I attach the same again for your reference.

The insured has received another statement from defense counsel. See attached. The total amount the insured has incurred is over $61,000. Has Hartford paid anything for the defense of this matter? The failure to pay for the defense as agreed has cause adverse financial consequences to the insured.

Please respond regarding how you will be addressing this. Your immediate attention would be appreciated (not to mention—required by Hartford's duties!).

L. Rich Humpherys

36 South State Street, Suite 1900
Salt Lake City, UT 84111
801 239 3170 (office)
801 450 2844 (mobile)

lrhumpherys@gmail.com

From: L Rich Humpherys [mailto:lrhumpherys@gmail.com]
Sent: Friday, February 2, 2018 12:42 PM
To: Melissa.siggia@thehartford.com; Paul.gosselin@thehartford.com
Cc: duffyb@lanepowell.com; 'Craig Swapp' <craig@craigswapp.com>; cfrost@maynardcooper.com
Subject: RE: Wilcox v Swapp v Hartford

Dear Ms. Siggia and Mr. Gosselin:

Please see the attached letter regarding Lane Powell rates for the defense of the Wilcox case. If you have any questions, please let me know.

L. Rich Humpherys
36 South State Street, Suite 1900
Salt Lake City, UT 84111
lrhumpherys@gmail.com

****
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****

EXHIBIT 5

LANE POWELL

Aaron

Aaron Schaer
Associate

Seattle
D 206.223.7103 C 248.302.2111
schaera@lanepowell.com

Aaron Schaer counsels clients on matters involving securities, governance issues, environmental law and litigation.

Clients appreciate Aaron's objective approach to solving problems, and his ability to look beyond the nuts and bolts of each case. Aaron describes his approach as immersive, noting that the initial exploration and discovery phase of each new matter is crucial to ensure a deep understanding of client context and both sides of an argument before making a recommendation.

Practices & Industries

Animal & Earth Advocacy
Class Actions
Commercial Litigation
Fiduciary Litigation
Investigations, Compliance & White Collar
Nonprofit & Social Enterprise
Securities Litigation

Education

University of Michigan Law School, J.D., *cum laude*, 2015

- *Michigan Journal of Environmental and Administrative Law*, Articles Editor
- Michigan Innocence Clinic, Student Attorney
- Michigan Unemployment Insurance Project, Student Attorney
- Faculty Research Assistant

Professional Experience

U.S. District Court, Western District of Washington, Law Clerk to the Honorable James L. Robart (December 2017 - March 2018)

U.S. District Court, Southern District of Texas, Law Clerk to the Honorable Janis Graham Jack (2015-2016)

Federal Defender Office, Eastern District of Michigan, Intern (2014)

U.S. District Court, District of Oregon, Judicial Extern to the Honorable Robert E. Jones (2013)

Columbia Riverkeeper, Intern (2013)

Natural Resources Defense Council

- Paralegal (2010-2012)
- Intern (2009-2010)

U.S. District Court, Eastern District of Michigan, Judicial Extern to the Honorable Bernard A. Friedman (2007)

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- Graduate Student Instructor, The Arab-Israeli Conflict
- Distinguished Instructor Award
- Henry M. Campbell Moot Court, Third Place Overall, Best Preliminary Round Brief, Best Quarterfinalist Oralist

Michigan State University, B.A., *cum laude*, 2009

- B.A., Political Theory & Constitutional Democracy, *cum laude*
- Teaching Assistant, Globalization and Stability

The Hebrew University, Rothberg International School , 2004-2005

Admissions

Michigan

U.S. District Court, Western District of Washington

Washington

Languages

Hebrew - Conversational

LinkedIn

https://www.linkedin.com/in/aaron-schaer-91437211/

Community Involvement

Volunteer, Bread for the City, Employment Justice Center (2010-2012)

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EXHIBIT 6

LANE POWELL

Taylor

Taylor Washburn
Associate

Seattle
D 206.223.7743
washburnt@lanepowell.com

Taylor Washburn focuses his practice on securities and corporate governance litigation, and investigations by the SEC, FINRA and state regulators.

Professional Experience

Wilmer Cutler Pickering Hale and Dorr, Associate (2007-2009)

U.S. District Court, Eastern District of Pennsylvania, Law Clerk for the Honorable Gene E.K. Pratter (2009-2011)

Korea Advanced Institute of Science and Technology, Visiting Professor (2011-2012)

Thought Leadership

August 1, 2017 | News
Washburn Quoted in *Law360* About Antitrust Takeaways in Petrobras Ruling
In the News

July 21, 2017 | Blog
Second Circuit Applies Morrison to Rule 23 Predominance Analysis, in In re Petrobras Securities, but Rejects Third Circuit's "Heightened" Ascertainability Requirement (July 7, 2017)
D&O Developments

June 22, 2017 | Publication
1st Circuit Clarifies Scienter Requirements
Law360

May 1, 2017 | Blog

Practices & Industries

Antitrust, Competition & Trade
Commercial Litigation
Investigations, Compliance & White Collar
Securities Litigation

Education

Johns Hopkins University
- M.A. candidate
- International Relations and Economics

Columbia Law School, J.D., 2007
- Harlan Fiske Stone Scholar

Bowdoin College, A.B., with high honors, 2004
- Phi Beta Kappa
- Pierce Memorial Prize for Legal Study
- Davis Award in Constitutional Law

Admissions

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LANE POWELL

Taylor Washburn

Washington
Massachusetts
U.S. Court of Appeals, Ninth Circuit
U.S. District Court, Western District of Washington
U.S. District Court, District of Massachusetts

Languages

Korean - Limited working proficiency
Japanese - Limited working proficiency

Blogs

dandodevelopments.com

LinkedIn

https://www.linkedin.com/in/taylorwashburn/

First Circuit Holds that Scienter Requires Knowledge That Non-Disclosure Risked Misleading Investors, Not Just Knowledge of Omitted Facts, in Brennan v. Zafgen, Inc. (April 7, 2017)
D&O Developments

January 20, 2017 | Blog

Great Expectations: First Circuit Affirms Dismissal of Complaint Challenging Unrealized Projections, in Ganem v. InVivo (January 9, 2017)
D&O Developments

November 21, 2016 | News

Washburn Admitted to Washington State Bar
Awards & Honors

June 14, 2016 | Blog

Sixth Circuit Affirms Dismissal on Scienter Grounds in Doshi v. Gen'l Cable Corp. (May 24, 2016)
D&O Developments

June 7, 2016 | Blog

Eighth Circuit Becomes First Appeals Court to Interpret Halliburton II in IBEW Local 98 Pension Fund, et al. v. Best Buy Co., Inc. (April 12, 2016)
D&O Developments

March 11, 2015 | Event / CLE

Overview of Securities Regulation in the United States
Jinan University | Guangzhou, China

June 13, 2014 | Publication

East Asia's Ultimate Geopolitical Puzzle
The National Interest

2014 | Publication

The Pivot to Asia: Fifteen Interviews on America's Pacific Future

May 7, 2012 | Event / CLE

An Introduction to IP Litigation in the United States
Seoul National University | South Korea

March 23, 2012 | Event / CLE

Intellectual Property for Business Leaders
Seoul National University | South Korea

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LANE POWELL

Taylor Washburn

December 23, 2011 | Event / CLE

The Korea-U.S. Free Trade Agreement: An American Perspective
KAIST Intellectual Property Strategy Workshop

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LANE POWELL

Kristin

Kristin Beneski
Associate

Seattle
D 206.223.7075
beneskik@lanepowell.com

Kristin Beneski represents clients in complex commercial litigation matters, including those related to securities, antitrust, insurance, intellectual property, employment, contract, tort, and regulatory matters.

Her experience includes work related to:

- Securities class actions
- Shareholder derivative suits
- SEC investigations
- International arbitration and litigation
- Professional liability
- Consumer protection
- Antitrust
- Internal investigations and compliance
- Federal and state enforcement proceedings
- Insurance coverage
- Contracts and business torts
- Trade secrets and intellectual property

Kristin has broad experience litigating in federal courts throughout the U.S. and in Washington, having represented both plaintiffs and defendants in a wide variety of trial and appellate proceedings. Kristin has played a key role in several federal-court trials and has co-authored several briefs to the U.S. Supreme Court. She also has experience with arbitrations, internal investigations, and assisting companies and individuals with enforcement proceedings involving state and federal authorities.

In addition, Kristin has represented clients in international legal matters ranging from Alien Tort Statute litigation to cross-border contractual disputes, and has worked on matters involving clients and opposing parties

Practices & Industries

Antitrust, Competition & Trade
Class Actions
Commercial Litigation
Electronic Discovery, Technology & Strategy
Nonprofit & Social Enterprise
International Arbitration
Insurance
Investigations, Compliance & White Collar
Securities Litigation

Education

Georgetown University Law Center, J.D., 2012

- Dean's List
- *The Tax Lawyer*, Final Editor
- Georgetown Outreach, Pro Bono Trip Coordinator
- Pro Bono Pledge award for exceptional service

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LANE POWELL

Amherst College, B.A., Political Science Major, 2008

Admissions

Washington

U.S. District Court, Eastern and Western Districts of Washington

U.S. Court of Appeals, Fourth and Ninth Circuits

Admitted Pro Hac Vice in a number of other jurisdictions

Honors

"Washington Rising Star," *Super Lawyers* magazine, Securities Litigation (2016-2018)

LinkedIn

https://www.linkedin.com/in/kristin-beneski-734b1b22/

located in China, Japan, Korea, India, Germany, France, Norway and Australia.

Kristin has provided *pro bono* representation to clients on death row in Texas and Louisiana and has advocated for several nonprofit organizations dedicated to conservation and animal advocacy.

Professional Experience

Lane Powell PC, Summer Associate (2011)

District of Columbia Superior Court, Judicial Intern for the Honorable Joseph E. Beshouri (2011)

U.S. District Court, Western District of Washington, Judicial Intern for the Honorable John C. Coughenour (2010)

Pathfinder, Leadership Council on Legal Diversity (2017)

Member, American Bar Association Section of Litigation

Member, American Bar Association International Arbitration Committee

Community Involvement

Pathfinder, Leadership Council on Legal Diversity (2017)

Member, American Bar Association Section of Litigation

Member, American Bar Association International Arbitration Committee

Thought Leadership

June 18, 2018 | News

Thirty-two Lane Powell Attorneys Named 'Washington Super Lawyers' and 14 Named 'Washington Rising Stars'

Awards & Honors

September 20, 2017 | Publication

Compelling and Staying Arbitration in Washington State

Practical Law

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LANE POWELL

Kristin Beneski

June 9, 2017 | News

Thirty-one Lane Powell Attorneys Named 'Washington Super Lawyers' and 16 Named 'Washington Rising Stars'

Awards & Honors

March 31, 2017 | News

Lane Powell Achieves Trial Victory for Lundberg LLC

Awards & Honors

March 30, 2017 | News

Beighle, Beneski, Bodine and Connors Featured in *Law360* Article 'Co. Told To Stop Using Rival's Technology After $5M Verdict'

In the News

February 7, 2017 | News

State of Washington v. Trump: Lane Powell Authors Two *Amicus* Briefs on Behalf of Law Professors

Firm Announcement

January 27, 2017 | News

Leadership Council for Legal Diversity Appoints 2017 Fellows and Pathfinders

Awards & Honors

June 10, 2016 | News

Thirty-one Lane Powell Attorneys Named 'Washington Super Lawyers' and 18 Named 'Washington Rising Stars'

Awards & Honors

October 21, 2014 | News

Lane Powell Files Brief on Behalf of Washington Legal Foundation in *Omnicare* Matter

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LANE POWELL

Devon

Devon McCurdy
Associate

Seattle
D 206.223.7739
mccurdyd@lanepowell.com

Devon McCurdy focuses his practice on securities and corporate governance litigation and other complex commercial litigation matters. Before joining Lane Powell, Devon served as Judicial Extern to the Honorable Michael W. Mosman of the U.S. District Court for the District of Oregon.

Professional Experience

Lane Powell PC, Summer Associate (2016)

U.S. District Court, District of Oregon, Judicial Extern to the Honorable Michael W. Mosman (2015)

Academic Student Employees Union (UAW 4121), Local Union Staff (2014)

University of Washington, Instructor and Teaching Assistant (2008-2013)

United State Forest Service (2009-2010)

Practices & Industries

Litigation
Commercial Litigation
Securities Litigation
Animal & Earth Advocacy

Education

University of Virginia School of Law, J.D., 2017

- Order of the Coif
- *Virginia Law Review*, Notes Editor
- Hardy Cross Dillard Scholarship Recipient
- Supreme Court Litigation Clinic, Member
- Student Legal Forum, President

University of Washington, Ph.D., History Major, 2013

- Dissertation — "Upstream Influence: The Economy, the State, and Oregon's Landscape, 1860-2000"

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LANE POWELL

Devon McCurdy

Carleton College, B.A., History Major, *magna cum laude* with distinction, 2005

- Phi Beta Kappa

Admissions

Washington

U.S. District Court, Eastern and Western Districts of Washington

Blogs

D&O Developments (contributing author)

LinkedIn

https://www.linkedin.com/in/devon-mccurdy-a9b20964/

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EXHIBIT 7

From:	Siggia, Melissa T (Liab + Finl Products Claims)
To:	Duffy, Barbara
Cc:	craig@craigswapp.com; L Rich Humpherys; Borja, Dominic
Subject:	RE: Lane Powell Invoice 3755346 Hartford Insurance/J. Craig Swapp (131106.000001) [CONFIDENTIAL] [HFSG-LLOSS.FID68085]
Date:	Wednesday, March 14, 2018 7:42:28 AM
Attachments:	image001.jpg image002.jpg

Hartford's electronic billing system in Bottomline Legal Exchange. In order to set up your firm for electronic billing, we will need a W-9.

Unfortunately, I received your email after the close of business yesterday and have a meeting scheduled for 10 PDT/1 EST. I am, however, available at 1:30 EST if that time works for you. Although not required to do so, we have approved rates for two timekeepers. However, other timekeepers should bill at our previously identified rates of $195 per hour for associates and $100 for paralegals. I hope to work through any remaining billing and discovery issues during our call.

Best,
Melissa

Melissa Siggia
Senior Home Office Consultant, MCU-Liability Claims

The Hartford Financial Services Group, Inc.
One Hartford Plaza , T-16
Hartford, Connecticut 06155
T: 860-547-4665
F: 888-326-2701
melissa.siggia@thehartford.com
www.thehartford.com
www.facebook.com/thehartford
www.twitter.com/thehartford

From: Duffy, Barbara [mailto:DuffyB@LanePowell.com]
Sent: Tuesday, March 13, 2018 5:33 PM
To: Siggia, Melissa T (Liab + Finl Products Claims)
Cc: craig@craigswapp.com; L Rich Humpherys; Borja, Dominc
Subject: RE: Lane Powell Invoice 3755346 Hartford Insurance/J. Craig Swapp (131106.000001) [CONFIDENTIAL] [HFSG-LLOSS.FID68085]

We have tried to submit to Ascent, you have to open a matter and there is not one opened. We also need our rates approved and you have only approved two timekeepers. Dominic will send you our W-9. He will also send you the unpaid invoices, Craig Swapp paid the others.

As for a call, I could talk today at 4:00 PDT or tomorrow at 10:00 PDT. Let me know if either work.

BARBARA J. DUFFY
Shareholder Bio | vCard
Litigation Department Director
duffyb@lanepowell.com
D 206.223.7944 **C** 206.612.2576
LANEPOWELL.COM

From: Siggia, Melissa T (Liab + Finl Products Claims) [mailto:melissa.siggia@thehartford.com]
Sent: Tuesday, March 13, 2018 11:30 AM
To: Duffy, Barbara <DuffyB@LanePowell.com>
Cc: craig@craigswapp.com; L Rich Humpherys <lrhumpherys@gmail.com>
Subject: RE: Lane Powell Invoice 3755346 Hartford Insurance/J. Craig Swapp (131106.000001) [CONFIDENTIAL] [HFSG-LLOSS.FID68085]

Barb,

In a prior email, I asked that if your firm has access to bill electronically to do so or to forward one email with all invoices so that I can submit them for payment along with a W-9. Please do so and I will initiate the payment process. Additionally, you asked that we discuss rates and discovery issues. I sent you an email earlier today responding with my availability for a call. Please let me know your availability.

Best,
Melissa

Melissa Siggia
Senior Home Office Consultant, MCU-Liability Claims

The Hartford Financial Services Group, Inc.
One Hartford Plaza , T-16
Hartford, Connecticut 06155
T: 860-547-4665
F: 888-326-2701
melissa.siggia@thehartford.com
www.thehartford.com
www.facebook.com/thehartford

www.twitter.com/thehartford

From: Duffy, Barbara [mailto:DuffyB@LanePowell.com]
Sent: Tuesday, March 13, 2018 2:26 PM
To: Siggia, Melissa T (Liab + Finl Products Claims); Gosselin, Paul J (Liab + Finl Products Claims)
Cc: craig@craigswapp.com; L Rich Humpherys; Duffy, Barbara
Subject: RE: Lane Powell Invoice 3755346 Hartford Insurance/J. Craig Swapp (131106.000001)

Ms. Siggia,

We have yet to receive any payments from the Hartford. As you can see the unpaid balance is mounting. We are in a critical phase of discovery in the case. We have responded to document requests, admissions and Interrogatories and are beginning the electronic document review.

Please provide us with an update. If you would prefer to address this through Mr. Humphrey alone, please let us know.

Barb

BARBARA J. DUFFY
Shareholder Bio | vCard
Litigation Department Director
duffyb@lanepowell.com
D 206.223.7944 **C** 206.612.2576
LANEPOWELL.COM

From: Borja, Dominic
Sent: Tuesday, March 13, 2018 11:09 AM
To: Melissa.Siggia@TheHartford.com; Paul.gosselin@thehartford.com
Cc: craig@craigswapp.com; Duffy, Barbara <DuffyB@LanePowell.com>
Subject: Lane Powell Invoice 3755346 Hartford Insurance/J. Craig Swapp (131106.000001)

Hello,

Attached please find our invoice for professional services rendered through February 28, 2018. Should you have any questions please contact Barbara Duffy at duffyb@lanepowell.com.

Thank you,

DOMINIC BORJA
Billing Specialist
borjad@lanepowell.com
D 206.223.1401
LANEPOWELL.COM

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****

EXHIBIT 8

LANE POWELL

Wire Transfer Information:
Wells Fargo Bank
ABA No. 121000248
Account No. 4940605967
Swift Code: WFBIUS6S

Pay by e-Check, Visa, or MC:
*Use **pay my bill***
link at lanepowell.com or call
(206) 223-6288

Remit Payments To:
P.O. Box 91302
Seattle, WA
98111-9402
Attn Cash Receipts
Fax: (206) 223-7107

Identification No. 20-2071651

Hartford Insurance
Attn Melissa Siggia & Paul Gosselin
email: Melissa.Siggia@TheHartford.com
Paul.gosselin@thehartford.com

April 24, 2018
Invoice No. 3759351

cc: J. Craig Swapp
16201 E. Indiana Ave Suite 1900
Spokane Valley WA 99216
Via email: craig@craigswapp.com

EBILL Hartford via Bottomline - Law.eXchange

Matter: 131106.000001

adv. Jade Wilcox
Complaints: Wilcox et at v Swapp Law et al
Claim No. : Y53 LP 48104
Insured : Swapp Law, PLLC
Policy No. : 34 SBA PF6578
Corporate ID : Y53LP48104

Summary of Account

CURRENT CHARGES - see attached	$144,289.69
PREVIOUS BALANCE as of April 24, 2018	$91,771.44
TOTAL AMOUNT DUE	$236,061.13

PLEASE REFERENCE OUR INVOICE OR MATTER NUMBER WITH YOUR PAYMENT

Payment Due Upon Receipt
A Monthly Interest Charge May Accrue On Unpaid Invoices

LANE POWELL

Wire Transfer Information:
Wells Fargo Bank
ABA No. 121000248
Account No. 4940605967
Swift Code: WFBIUS6S

Pay by e-Check, Visa, or MC:
Use **pay my bill** link at lanepowell.com or call (206) 223-6288

Remit Payments To:
P.O. Box 91302
Seattle, WA
98111-9402
Attn Cash Receipts
Fax: (206) 223-7107

Identification No. 20-2071651

Hartford Insurance
Attn Melissa Siggia & Paul Gosselin
email: Melissa.Siggia@TheHartford.com
Paul.gosselin@thehartford.com

April 24, 2018
Invoice No. 3759351

cc: J. Craig Swapp
16201 E. Indiana Ave Suite 1900
Spokane Valley WA 99216
Via email: craig@craigswapp.com

EBILL Hartford via Bottomline - Law.eXchange

FOR PROFESSIONAL SERVICES RENDERED THROUGH 03/31/18

Matter: 131106.000001

adv. Jade Wilcox
Complaints: Wilcox et at v Swapp Law et al
Claim No. : Y53 LP 48104
Insured : Swapp Law, PLLC
Policy No. : 34 SBA PF6578
Corporate ID : Y53LP48104

L100 Assessment/Development/Admin
L110 Fact Investigation/Development

03/01/2018	D. McCurdy	Redacted	0.20	62.00
03/01/2018	D. McCurdy		1.10	341.00

		Redacted		
03/02/2018	D. McCurdy		1.00	310.00
03/02/2018	D. McCurdy		0.70	217.00
03/05/2018	D. McCurdy		2.50	775.00
03/05/2018	D. McCurdy		1.10	341.00

		Redacted		
03/05/2018	D. McCurdy		0.80	248.00
03/05/2018	D. McCurdy		1.10	341.00
03/06/2018	D. McCurdy		0.90	279.00
03/06/2018	D. McCurdy		2.00	620.00
03/06/2018	D. McCurdy		0.60	186.00
03/06/2018	D. McCurdy		0.40	124.00
03/06/2018	D. McCurdy		1.20	372.00

		Redacted		
03/06/2018	D. McCurdy		0.70	217.00
03/08/2018	D. McCurdy		0.30	93.00
03/08/2018	D. McCurdy		0.70	217.00
03/08/2018	D. McCurdy		1.40	434.00
03/09/2018	B. Duffy		0.90	580.50
03/09/2018	D. McCurdy		0.30	93.00

03/09/2018	D. McCurdy	Redacted	0.70	217.00
03/09/2018	D. McCurdy		0.40	124.00
03/11/2018	D. McCurdy		0.20	62.00
03/12/2018	D. McCurdy		0.70	217.00
03/12/2018	D. McCurdy		1.20	372.00
03/12/2018	D. McCurdy		0.20	62.00
03/13/2018	D. McCurdy		3.20	992.00
03/13/2018	D. McCurdy		1.20	372.00
03/14/2018	K. Beneski		0.80	332.00

03/14/2018	B. Duffy	Redacted	0.70	451.50
03/14/2018	D. McCurdy		2.20	682.00
03/14/2018	D. McCurdy		0.40	124.00
03/15/2018	K. Beneski		3.90	1,618.50
03/15/2018	D. McCurdy		0.40	124.00
03/15/2018	S. Reich		0.90	270.00
03/16/2018	K. Beneski		1.50	622.50
03/16/2018	B. Duffy		5.30	3,418.50

		Redacted		
03/16/2018	S. Reich		0.30	90.00
03/18/2018	K. Beneski		0.90	373.50
03/19/2018	K. Beneski		1.30	539.50
03/19/2018	D. McCurdy		0.30	93.00
03/19/2018	D. McCurdy		0.10	31.00
03/19/2018	D. McCurdy		1.70	527.00
03/19/2018	D. McCurdy		0.10	31.00
03/20/2018	D. McCurdy		0.20	62.00
03/20/2018	D. McCurdy		0.20	62.00

03/21/2018	D. McCurdy	Redacted	0.60	186.00
03/21/2018	D. McCurdy		0.30	93.00
03/21/2018	D. McCurdy		0.50	155.00
03/22/2018	D. McCurdy		0.70	217.00
03/22/2018	D. McCurdy		0.70	217.00
03/22/2018	D. McCurdy		0.20	62.00
03/23/2018	D. McCurdy		0.20	62.00
03/23/2018	D. McCurdy		0.90	279.00
03/24/2018	D. McCurdy		0.10	31.00

		Redacted		
03/26/2018	B. Duffy		0.60	387.00
03/26/2018	B. Duffy		0.50	322.50
03/26/2018	B. Duffy		0.40	258.00
03/26/2018	D. McCurdy		1.10	341.00
03/27/2018	B. Duffy		1.30	838.50
03/27/2018	S. Reich		2.20	660.00
03/28/2018	B. Duffy		2.10	1,354.50

		Redacted		
03/28/2018	D. McCurdy		2.40	744.00
03/28/2018	D. McCurdy		1.30	403.00
03/28/2018	D. McCurdy		1.70	527.00
03/28/2018	D. McCurdy		0.40	124.00
03/28/2018	S. Reich		2.30	690.00
03/29/2018	D. McCurdy		3.70	1,147.00
03/29/2018	D. McCurdy		0.50	155.00
03/29/2018	D. McCurdy		0.70	217.00

		Redacted		
03/29/2018	S. Reich		0.70	210.00
03/30/2018	D. McCurdy		1.80	558.00
03/30/2018	D. McCurdy		0.30	93.00
03/30/2018	D. McCurdy		0.30	93.00
		Task L110 Subtotal	**75.40**	**$28,145.00**
		L120 Analysis/Strategy		
03/01/2018	B. Duffy	Redacted	0.60	387.00
03/06/2018	D. McCurdy		1.10	341.00
03/12/2018	R. McBride		0.50	270.00

		Redacted		
03/13/2018	K. Beneski	[redacted]	0.40	166.00
03/15/2018	B. Duffy	[redacted]	0.50	322.50
03/17/2018	B. Duffy	[redacted]	0.90	580.50
03/19/2018	K. Beneski	[redacted]	1.70	705.50
03/19/2018	B. Duffy	[redacted]	0.40	258.00
03/19/2018	B. Duffy	[redacted]	1.30	838.50
03/19/2018	R. McBride	[redacted]	1.60	864.00
03/19/2018	S. Reich	[redacted]	1.10	330.00
03/20/2018	D. McCurdy	[redacted]	0.40	124.00

		Redacted		
03/21/2018	B. Duffy		0.60	387.00
03/28/2018	S. Reich		1.20	360.00
03/28/2018	S. Reich		0.80	240.00
03/29/2018	S. Reich		1.30	390.00
03/30/2018	S. Reich		1.40	420.00
		Task L120 Subtotal	**15.80**	**$6,984.00**
		L130 Experts/Consultants		
03/19/2018	B. Duffy	Redacted	0.30	193.50
03/20/2018	B. Duffy		0.40	258.00

03/21/2018	B. Duffy	Redacted	0.30	193.50
03/22/2018	B. Duffy		0.80	516.00
		Task L130 Subtotal	**1.80**	**$1,161.00**
		L140 Document/File Management		
03/14/2018	S. Reich	Redacted	1.80	540.00
		Task L140 Subtotal	**1.80**	**$540.00**
		Phase L100 Total	**94.80**	**$36,830.00**
		L200 Pre-trial Pleadings/Motions		
		L210 Pleadings		
03/06/2018	B. Duffy	Redacted	0.60	387.00
03/13/2018	B. Duffy		0.70	451.50
03/13/2018	B. Duffy		0.90	580.50
03/13/2018	D. McCurdy		1.50	465.00

03/13/2018	D. McCurdy	Redacted	0.60	186.00
03/14/2018	B. Duffy		0.90	580.50
03/14/2018	B. Duffy		0.30	193.50
03/14/2018	B. Duffy		0.40	258.00
03/15/2018	B. Duffy		0.50	322.50
03/16/2018	B. Duffy		0.30	193.50
03/20/2018	B. Duffy		0.30	193.50
		Task L210 Subtotal	**7.00**	**$3,811.50**
		L230 Court Mandated Conferences		
03/12/2018	K. Beneski	Redacted	0.50	207.50

03/12/2018	K. Beneski	Redacted	0.70	290.50
		Task L230 Subtotal	**1.20**	**$498.00**
		L250 Other Written Motions/Submissions		
03/13/2018	K. Beneski	Redacted	0.70	290.50
03/14/2018	K. Beneski		4.10	1,701.50
03/15/2018	K. Beneski		3.50	1,452.50
03/16/2018	K. Beneski		1.90	788.50
03/16/2018	B. Duffy		1.90	1,225.50
		Task L250 Subtotal	**12.10**	**$5,458.50**
		L260 Class Action Certification and Notice		
03/14/2018	R. McBride	Redacted	0.80	432.00
03/15/2018	R. McBride		0.60	324.00

		Redacted		
03/16/2018	R. McBride	[redacted]	0.70	378.00
03/20/2018	R. McBride	[redacted]	1.50	810.00
03/21/2018	R. McBride	[redacted]	4.10	2,214.00
03/22/2018	R. McBride	[redacted]	2.50	1,350.00
03/27/2018	R. McBride	[redacted]	1.50	810.00
		Task L260 Subtotal	**11.70**	**$6,318.00**
		Phase L200 Total	**32.00**	**$16,086.00**
		L300 Discovery		
		L310 Written Discovery		
		Redacted		
03/01/2018	B. Duffy	[redacted]	0.30	193.50
03/02/2018	B. Duffy	[redacted]	1.60	1,032.00

		Redacted		
03/03/2018	B. Duffy		1.90	1,225.50
03/05/2018	K. Beneski		0.20	83.00
03/05/2018	K. Beneski		0.60	249.00
03/05/2018	K. Beneski		0.50	207.50
03/05/2018	B. Duffy		2.10	1,354.50
03/06/2018	K. Beneski		1.00	415.00
03/06/2018	K. Beneski		1.50	622.50

		Redacted		
03/06/2018	K. Beneski		1.80	747.00
03/06/2018	B. Duffy		3.80	2,451.00
03/07/2018	K. Beneski		0.50	207.50
03/07/2018	B. Duffy		2.00	1,290.00

		Redacted		
03/07/2018	B. Duffy		2.20	1,419.00
03/08/2018	K. Beneski		0.50	207.50
03/08/2018	K. Beneski		1.20	498.00
03/08/2018	B. Duffy		1.50	967.50
03/09/2018	K. Beneski		2.10	871.50
03/11/2018	K. Beneski		0.80	332.00
03/11/2018	K. Beneski		0.90	373.50

		Redacted		
03/11/2018	B. Duffy		0.90	580.50
03/11/2018	R. McBride		0.70	378.00
03/12/2018	K. Beneski		1.80	747.00
03/12/2018	B. Duffy		1.50	967.50
03/13/2018	B. Duffy		0.90	580.50
03/27/2018	K. Beneski		0.00	NO CHARGE
03/27/2018	B. Duffy		0.40	258.00
03/28/2018	R. McBride		1.20	648.00
03/29/2018	R. McBride		1.80	972.00

		Redacted		
		Task L310 Subtotal	**36.20**	**$19,878.50**
		L320 Document Production		
03/01/2018	K. Beneski	Redacted	3.20	1,328.00
03/01/2018	S. Reich		1.20	360.00
03/01/2018	S. Reich		0.60	180.00
03/02/2018	K. Beneski		4.70	1,950.50
03/02/2018	R. McBride		1.20	648.00
03/02/2018	S. Reich		0.80	240.00
03/05/2018	K. Beneski		1.20	498.00
03/05/2018	B. Duffy		2.40	1,548.00

		Redacted		
03/05/2018	B. Duffy		0.50	322.50
03/05/2018	R. McBride		0.80	432.00
03/05/2018	S. Reich		1.60	480.00
03/05/2018	S. Reich		0.40	120.00
03/06/2018	B. Duffy		0.90	580.50

03/06/2018	R. McBride	Redacted	1.20	648.00
03/06/2018	S. Reich		5.50	1,650.00
03/06/2018	S. Reich		0.60	180.00
03/07/2018	K. Beneski		1.00	415.00
03/07/2018	K. Beneski		0.50	207.50
03/07/2018	R. McBride		0.90	486.00

		Redacted		
03/07/2018	S. Reich		1.40	420.00
03/08/2018	K. Beneski		0.40	166.00
03/08/2018	B. Duffy		1.20	774.00
03/08/2018	B. Duffy		1.30	838.50
03/08/2018	R. McBride		0.50	270.00
03/08/2018	S. Reich		0.20	60.00
03/08/2018	S. Reich		0.70	210.00
03/09/2018	B. Duffy		1.00	645.00
03/09/2018	R. McBride		0.30	162.00

		Redacted		
03/09/2018	S. Reich		1.60	480.00
03/11/2018	B. Duffy		0.60	387.00
03/12/2018	B. Duffy		2.00	1,290.00
03/12/2018	S. Reich		0.30	90.00
03/13/2018	K. Beneski		1.90	788.50

		Redacted		
03/13/2018	K. Beneski		0.70	290.50
03/13/2018	K. Beneski		0.70	290.50
03/13/2018	B. Duffy		0.40	258.00
03/13/2018	B. Duffy		0.80	516.00
03/13/2018	B. Duffy		0.40	258.00
03/13/2018	B. Duffy		0.30	193.50
03/13/2018	R. McBride		0.80	432.00
03/13/2018	S. Reich		1.60	480.00
03/14/2018	B. Duffy		1.10	709.50

		Redacted		
03/14/2018	S. Reich		0.30	90.00
03/15/2018	B. Duffy		0.60	387.00
03/16/2018	B. Duffy		0.30	193.50
03/19/2018	K. Beneski		0.60	249.00
03/19/2018	B. Duffy		0.50	322.50
03/20/2018	K. Beneski		0.90	373.50
03/20/2018	B. Duffy		0.80	516.00

		Redacted		
03/20/2018	R. McBride		0.30	162.00
03/20/2018	S. Reich		0.40	120.00
03/21/2018	K. Beneski		1.20	498.00
03/21/2018	B. Duffy		0.50	322.50
03/21/2018	B. Duffy		1.20	774.00
03/21/2018	B. Duffy		0.50	322.50
03/21/2018	R. McBride		0.30	162.00
03/22/2018	B. Duffy		0.30	193.50
03/22/2018	B. Schmidt		3.10	914.50
03/23/2018	K. Beneski		0.60	249.00
03/23/2018	B. Schmidt		0.60	177.00

03/26/2018	K. Beneski	Redacted	0.30	124.50
03/26/2018	K. Beneski		0.50	207.50
03/26/2018	K. Beneski		0.60	249.00
03/26/2018	B. Duffy		0.60	387.00
03/26/2018	B. Duffy		1.30	838.50
03/27/2018	K. Beneski		0.20	83.00
03/27/2018	B. Duffy		0.60	387.00
03/27/2018	B. Duffy		0.40	258.00
03/27/2018	B. Duffy		0.60	387.00
03/27/2018	B. Duffy		0.40	258.00
03/27/2018	R. McBride		0.20	108.00

		Redacted		
03/27/2018	S. Reich		0.90	270.00
03/28/2018	K. Beneski		1.50	622.50
03/28/2018	B. Duffy		0.20	129.00
03/28/2018	B. Duffy		0.40	258.00
03/28/2018	S. Reich		1.10	330.00
03/29/2018	K. Beneski		1.50	622.50
03/29/2018	B. Duffy		0.50	322.50
03/29/2018	B. Duffy		1.40	903.00
03/29/2018	S. Reich		1.20	360.00

		Redacted		
03/30/2018	B. Duffy	[redacted]	0.70	451.50
03/30/2018	R. McBride	[redacted]	3.70	1,998.00
		Task L320 Subtotal	**81.20**	**$37,864.00**
		L350 Discovery Motions		
03/20/2018	R. McBride	Redacted	0.30	162.00
03/29/2018	B. Duffy	[redacted]	1.60	1,032.00
03/30/2018	B. Duffy	[redacted]	0.50	322.50
		Task L350 Subtotal	**2.40**	**$1,516.50**
		Phase L300 Total	**119.80**	**$59,259.00**
		L400 Trial Preparation and Trial		
		L410 Fact Witnesses		
03/07/2018	K. Beneski	Redacted	1.10	456.50
03/07/2018	K. Beneski	[redacted]	0.70	290.50
03/08/2018	K. Beneski	[redacted]	1.20	498.00
03/08/2018	B. Duffy	[redacted]	0.40	258.00

		Redacted		
03/13/2018	B. Duffy		0.30	193.50
03/13/2018	B. Duffy		0.60	387.00
03/15/2018	K. Beneski		2.50	1,037.50
03/15/2018	B. Duffy		4.60	2,967.00
03/16/2018	K. Beneski		2.50	1,037.50
03/17/2018	B. Duffy		0.50	322.50
03/20/2018	B. Duffy		0.30	193.50

03/20/2018	B. Duffy	Redacted	0.90	580.50
03/21/2018	B. Duffy		1.20	774.00
03/22/2018	K. Beneski		3.00	1,245.00
03/22/2018	B. Duffy		3.40	2,193.00
03/22/2018	R. McBride		1.50	810.00
03/23/2018	K. Beneski		2.90	1,203.50
03/23/2018	K. Beneski		4.50	1,867.50

		Redacted		
03/23/2018	B. Duffy	[redacted]	6.10	3,934.50
03/23/2018	R. McBride	[redacted]	0.10	54.00
03/26/2018	R. McBride	[redacted]	0.20	108.00
		Task L410 Subtotal	**38.50**	**$20,411.50**
		L440 Other Preparation/Support		
		Redacted		
03/12/2018	L. Evans	[redacted]	0.50	105.00
03/15/2018	B. Duffy	[redacted]	2.40	1,548.00
		Task L440 Subtotal	**2.90**	**$1,653.00**
		Phase L400 Total	**41.40**	**$22,064.50**
		L500 Appeal		
		L530 Oral Argument		
		Redacted		
03/15/2018	B. Duffy	[redacted]	1.10	709.50
		Task L530 Subtotal	**1.10**	**$709.50**
		Phase L500 Total	**1.10**	**$709.50**

OUR FEE $134,949.00

COSTS ADVANCED

E100 Expenses

	Telephone conference call service	7.15
	Reproduction costs	97.05
	Court Document Charge	1.76
	Lane Powell discovery services	7,705.87
03/01/2018	Records obtained from - Washington State Patrol, 3/1/18	3.82
03/12/2018	Records obtained from - Pend Oreille County Sheriff's Office, copy of Collision Report Training Manual, 3/12/18	10.23
03/26/2018	Records obtained from - Spokane County Sheriff's Office, 3/22/18	3.97
03/29/2018	Air fare - - K. Beneski, To attend hearing and visit client's office, Spokane WA, 03/15/18 - 03/16/18	452.60
03/29/2018	Air fare - - B. Duffy, To attend hearing and visit client's office, Spokane WA, 03/15/18 - 03/16/18	452.60
03/30/2018	Records obtained from - Washington State Patrol, 3/30/18	7.97
03/30/2018	Travel expense - - B. Duffy, Uber home from airport after flying to Boise, Seattle WA, 03/23/18	37.91
03/30/2018	Professional services - Discovia, 2/23/18 - 3/26/18	447.05
03/30/2018	Travel expense - - B. Duffy, Uber to airport to fly to Spokane, Seattle WA, 03/15/18	30.60
03/30/2018	Travel expense - - B. Duffy, Uber home from airport after flying to Spokane, Seattle WA, 03/16/18	41.99
03/30/2018	Travel expense - - B. Duffy, Uber to Airport to fly to Boise, Seattle WA, 03/22/18	40.12
	Phase Subtotal	$9,340.69

TOTAL COSTS ADVANCED $ 9,340.69

RATE SUMMARY

Attorney/Timekeeper	Hours Worked	Billed Per Hour	Bill Amount
B. Duffy	92.40	645.00	59,598.00
R. McBride	29.80	540.00	16,092.00
K. Beneski	75.90	415.00	31,498.50
D. McCurdy	52.40	310.00	16,244.00
S. Reich	34.40	300.00	10,320.00
B. Schmidt	3.70	295.00	1,091.50
L. Evans	0.50	210.00	105.00
Total all Timekeepers	289.10		134,949.00

TOTAL THIS INVOICE $144,289.69

LANE POWELL

Wire Transfer Information:
Wells Fargo Bank
ABA No. 121000248
Account No. 4940605967
Swift Code: WFBIUS6S

Pay by e-Check, Visa, or MC:
Use **pay my bill**
link at lanepowell.com or call
(206) 223-6288

Remit Payments To:
P.O. Box 91302
Seattle, WA
98111-9402
Attn Cash Receipts
Fax: (206) 223-7107

Identification No. 20-2071651

Hartford Insurance
Attn Melissa Siggia & Paul Gosselin
email: Melissa.Siggia@TheHartford.com
Paul.gosselin@thehartford.com

May 21, 2018
Invoice No. 3761880

cc: J. Craig Swapp
16201 E. Indiana Ave Suite 1900
Spokane Valley WA 99216
Via email: craig@craigswapp.com

EBILL Hartford via Bottomline - Law.eXchange

Include cost backup when sending the invoice

Matter: 131106.000001

adv. Jade Wilcox
Complaints: Wilcox et at v Swapp Law et al
Claim No. : Y53 LP 48104
Insured : Swapp Law, PLLC
Policy No. : 34 SBA PF6578
Corporate ID : Y53LP48104

PLEASE REFERENCE OUR INVOICE OR MATTER NUMBER WITH YOUR PAYMENT

Payment Due Upon Receipt
A Monthly Interest Charge May Accrue On Unpaid Invoices

LANE POWELL

Wire Transfer Information:
Wells Fargo Bank
ABA No. 121000248
Account No. 4940605967
Swift Code: WFBIUS6S

Pay by e-Check, Visa, or MC:
Use pay ***my bill***
link at lanepowell.com or call
(206) 223-6288

Remit Payments To:
P.O. Box 91302
Seattle, WA
98111-9402
Attn Cash Receipts
Fax: (206) 223-7107

Identification No. 20-2071651
May 21, 2018
Invoice No. 3761880

Summary of Account

CURRENT CHARGES - see attached	$133,357.43
PREVIOUS BALANCE as of April 24, 2018	$236,061.13
LESS PAYMENTS RECEIVED	($67,471.73)
LESS TRUST ACCOUNT FUNDS	($9,076.65)
TOTAL AMOUNT DUE	$292,870.18

LANE POWELL

Wire Transfer Information:
Wells Fargo Bank
ABA No. 121000248
Account No. 4940605967
Swift Code: WFBIUS6S

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*Use **pay my bill***
link at lanepowell.com or call
(206) 223-6288

Remit Payments To:
P.O. Box 91302
Seattle, WA
98111-9402
Attn Cash Receipts
Fax: (206) 223-7107

Identification No. 20-2071651

Hartford Insurance
Attn Melissa Siggia & Paul Gosselin
email: Melissa.Siggia@TheHartford.com
Paul.gosselin@thehartford.com

May 21, 2018
Invoice No. 3761880

cc: J. Craig Swapp
16201 E. Indiana Ave Suite 1900
Spokane Valley WA 99216
Via email: craig@craigswapp.com

EBILL Hartford via Bottomline - Law.eXchange

Include cost backup when sending the invoice

FOR PROFESSIONAL SERVICES RENDERED THROUGH 04/30/18

Matter: 131106.000001

adv. Jade Wilcox
Complaints: Wilcox et at v Swapp Law et al
Claim No. : Y53 LP 48104
Insured : Swapp Law, PLLC
Policy No. : 34 SBA PF6578
Corporate ID : Y53LP48104

L100 Assessment/Development/Admin
L110 Fact Investigation/Development

04/02/2018	D. McCurdy	Redacted	1.20	372.00
04/02/2018	D. McCurdy		0.10	31.00
04/02/2018	D. McCurdy		2.30	713.00

04/02/2018	D. McCurdy	Redacted	0.40	124.00
04/02/2018	S. Reich		4.40	1,320.00
04/02/2018	S. Reich		3.20	960.00
04/02/2018	S. Reich		0.50	150.00
04/02/2018	S. Reich		0.70	210.00
04/03/2018	D. McCurdy		0.90	279.00
04/03/2018	D. McCurdy		2.50	775.00
04/03/2018	D. McCurdy		0.90	279.00

04/03/2018	S. Reich	Redacted	0.00	NO CHARGE
04/03/2018	S. Reich		1.10	330.00
04/04/2018	D. McCurdy		0.00	NO CHARGE
04/04/2018	D. McCurdy		0.00	NO CHARGE
04/04/2018	D. McCurdy		1.70	527.00
04/05/2018	D. McCurdy		5.30	1,643.00
04/05/2018	D. McCurdy		0.80	248.00
04/05/2018	S. Reich		1.70	510.00
04/06/2018	D. McCurdy		0.00	NO CHARGE
04/06/2018	D. McCurdy		2.80	868.00

		Redacted		
04/07/2018	D. McCurdy	[redacted]	0.00	NO CHARGE
04/08/2018	D. McCurdy	[redacted]	0.50	155.00
04/08/2018	D. McCurdy	[redacted]	0.00	NO CHARGE
04/09/2018	D. McCurdy	[redacted]	0.30	93.00
04/09/2018	D. McCurdy	[redacted]	3.00	930.00
04/09/2018	D. McCurdy	[redacted]	1.20	372.00
04/09/2018	D. McCurdy	[redacted]	1.10	341.00
04/10/2018	D. McCurdy	[redacted]	0.80	248.00
04/10/2018	D. McCurdy	[redacted]	0.70	217.00

		Redacted		
04/11/2018	D. McCurdy	[redacted]	0.10	31.00
04/11/2018	D. McCurdy	[redacted]	0.50	155.00
04/11/2018	S. Reich	[redacted]	3.10	930.00
04/11/2018	S. Reich	[redacted]	1.20	360.00
04/11/2018	S. Reich	[redacted]	1.10	330.00
04/12/2018	D. McCurdy	[redacted]	0.70	217.00
04/12/2018	D. McCurdy	[redacted]	0.90	279.00
04/12/2018	D. McCurdy	[redacted]	0.00	NO CHARGE

		Redacted		
04/12/2018	D. McCurdy		1.30	403.00
04/12/2018	D. McCurdy		0.80	248.00
04/12/2018	S. Reich		0.30	90.00
04/12/2018	S. Reich		0.40	120.00
04/12/2018	S. Reich		4.30	1,290.00
04/13/2018	B. Duffy		0.50	322.50
04/13/2018	B. Duffy		0.50	322.50
04/13/2018	D. McCurdy		0.40	124.00
04/13/2018	D. McCurdy		0.70	217.00
04/13/2018	E. Rance		0.10	21.00
04/13/2018	S. Reich		1.60	480.00

		Redacted		
04/13/2018	S. Reich		0.40	120.00
04/16/2018	D. McCurdy		6.30	1,953.00
04/16/2018	S. Reich		6.30	1,890.00
04/16/2018	S. Reich		0.80	240.00
04/17/2018	R. McBride		0.60	324.00
04/17/2018	D. McCurdy		4.30	1,333.00
04/17/2018	D. McCurdy		0.60	186.00

		Redacted		
04/17/2018	D. McCurdy	[redacted]	0.60	186.00
04/17/2018	S. Reich	[redacted]	7.20	2,160.00
04/18/2018	R. McBride	[redacted]	1.50	810.00
04/18/2018	D. McCurdy	[redacted]	1.80	558.00
04/18/2018	D. McCurdy	[redacted]	1.20	372.00
04/18/2018	D. McCurdy	[redacted]	0.60	186.00
04/18/2018	D. McCurdy	[redacted]	0.90	279.00
04/18/2018	S. Reich	[redacted]	6.80	2,040.00

		Redacted		
04/18/2018	S. Reich	[redacted]	0.40	120.00
04/19/2018	D. McCurdy	[redacted]	1.20	372.00
04/19/2018	D. McCurdy	[redacted]	0.40	124.00
04/19/2018	D. McCurdy	[redacted]	0.00	NO CHARGE
04/19/2018	D. McCurdy	[redacted]	1.90	589.00
04/19/2018	S. Reich	[redacted]	6.90	2,070.00
04/19/2018	S. Reich	[redacted]	0.60	180.00

04/19/2018	B. Schmidt	Redacted	1.70	501.50
04/20/2018	D. McCurdy		1.30	403.00
04/20/2018	S. Reich		7.70	2,310.00
04/20/2018	B. Schmidt		0.90	265.50
04/23/2018	D. McCurdy		1.00	310.00
04/23/2018	D. McCurdy		0.30	93.00
04/23/2018	D. McCurdy		0.60	186.00
04/23/2018	S. Reich		0.30	90.00
04/23/2018	S. Reich		0.30	90.00

		Redacted		
04/23/2018	S. Reich		0.90	270.00
04/24/2018	D. McCurdy		0.40	124.00
04/24/2018	D. McCurdy		0.20	62.00
04/24/2018	S. Reich		0.30	90.00
04/24/2018	S. Reich		0.70	210.00
04/25/2018	D. McCurdy		0.30	93.00
04/25/2018	D. McCurdy		0.90	279.00
04/25/2018	D. McCurdy		0.20	62.00
04/25/2018	S. Reich		1.60	480.00

04/25/2018	S. Reich	Redacted	2.40	720.00
04/26/2018	D. McCurdy		1.20	372.00
04/26/2018	D. McCurdy		0.20	62.00
04/26/2018	S. Reich		6.40	1,920.00
04/26/2018	S. Reich		0.40	120.00
04/27/2018	D. McCurdy		0.10	31.00
04/27/2018	D. McCurdy		0.30	93.00

		Redacted		
04/27/2018	D. McCurdy		0.20	62.00
04/27/2018	D. McCurdy		0.80	248.00
04/27/2018	S. Reich		0.20	60.00
04/27/2018	S. Reich		4.40	1,320.00
04/29/2018	D. McCurdy		0.40	124.00
04/30/2018	R. McBride		3.30	1,782.00
04/30/2018	D. McCurdy		0.20	62.00
04/30/2018	D. McCurdy		0.80	248.00
04/30/2018	D. McCurdy		0.40	124.00

		Redacted		
04/30/2018	D. McCurdy		0.40	124.00
04/30/2018	S. Reich		0.60	180.00
04/30/2018	S. Reich		8.20	2,460.00
		Task L110 Subtotal	**158.40**	**$49,758.00**
		L120 Analysis/Strategy		
04/02/2018	B. Duffy	Redacted	0.30	193.50
04/02/2018	R. McBride		0.50	270.00
04/05/2018	B. Duffy		0.10	64.50
04/05/2018	S. Reich		0.40	120.00

04/06/2018	S. Reich	Redacted	3.10	930.00
04/07/2018	K. Beneski		0.20	83.00
04/07/2018	B. Duffy		0.80	516.00
04/09/2018	K. Beneski		0.00	NO CHARGE
04/09/2018	B. Duffy		0.40	258.00
04/09/2018	S. Reich		0.90	270.00
04/09/2018	S. Reich		0.60	180.00
04/10/2018	B. Duffy		0.70	451.50

		Redacted		
04/10/2018	S. Reich		0.90	270.00
04/19/2018	R. McBride		0.90	486.00
04/23/2018	A. Schaer		0.90	297.00
04/24/2018	A. Schaer		4.10	1,353.00
04/25/2018	A. Schaer		2.90	957.00
		Task L120 Subtotal	**17.70**	**$6,699.50**
		L130 Experts/Consultants		
04/13/2018	K. Beneski	Redacted	1.00	415.00
04/13/2018	K. Beneski		0.40	166.00
04/13/2018	B. Duffy		1.70	1,096.50

		Redacted		
04/23/2018	B. Duffy		0.90	580.50
04/26/2018	B. Duffy		0.50	322.50
		Task L130 Subtotal	**4.50**	**$2,580.50**
		Phase L100 Total	**180.60**	**$59,038.00**
		L200 Pre-trial Pleadings/Motions		
		L210 Pleadings		
04/19/2018	D. McCurdy	Redacted	0.30	93.00
04/27/2018	K. Beneski		0.70	290.50
04/27/2018	R. McBride		0.40	216.00
		Task L210 Subtotal	**1.40**	**$599.50**
		L250 Other Written Motions/Submissions		
04/26/2018	B. Duffy	Redacted	0.50	322.50
04/27/2018	B. Duffy		0.70	451.50
		Task L250 Subtotal	**1.20**	**$774.00**
		Phase L200 Total	**2.60**	**$1,373.50**
		L300 Discovery		
		L310 Written Discovery		
04/05/2018	K. Beneski	Redacted	0.40	166.00

		Redacted		
04/05/2018	B. Duffy		0.50	322.50
04/06/2018	K. Beneski		1.80	747.00
04/06/2018	B. Duffy		0.60	387.00
04/07/2018	B. Duffy		0.90	580.50
04/09/2018	B. Duffy		0.30	193.50
04/13/2018	B. Duffy		1.40	903.00
04/13/2018	R. McBride		0.30	162.00
04/23/2018	K. Beneski		1.70	705.50
04/23/2018	B. Duffy		1.90	1,225.50

		Redacted		
04/27/2018	B. Duffy		0.30	193.50
04/30/2018	K. Beneski		1.40	581.00
		Task L310 Subtotal	**11.50**	**$6,167.00**
		L320 Document Production		
03/29/2018	B. Duffy	Redacted	0.30	193.50
04/02/2018	K. Beneski		0.00	NO CHARGE
04/02/2018	B. Duffy		1.30	838.50
04/02/2018	B. Duffy		0.50	322.50
04/02/2018	B. Duffy		0.50	322.50
04/02/2018	R. McBride		0.40	216.00

		Redacted		
04/03/2018	B. Duffy		0.90	580.50
04/03/2018	R. McBride		1.50	810.00
04/04/2018	B. Duffy		0.50	322.50
04/04/2018	B. Duffy		0.40	258.00
04/05/2018	B. Duffy		1.10	709.50
04/05/2018	B. Duffy		0.80	516.00
04/06/2018	B. Duffy		0.60	387.00

		Redacted		
04/06/2018	B. Duffy	[redacted]	0.40	258.00
04/06/2018	B. Schmidt	[redacted]	0.90	265.50
04/08/2018	B. Duffy	[redacted]	0.70	451.50
04/08/2018	B. Duffy	[redacted]	0.90	580.50
04/09/2018	B. Duffy	[redacted]	1.30	838.50
04/10/2018	K. Beneski	[redacted]	0.90	373.50
04/10/2018	B. Duffy	[redacted]	1.10	709.50
04/10/2018	B. Duffy	[redacted]	0.40	258.00
04/10/2018	B. Schmidt	[redacted]	2.30	678.50

		Redacted		
04/11/2018	B. Duffy	[redacted]	0.60	387.00
04/11/2018	B. Schmidt	[redacted]	2.40	708.00
04/12/2018	B. Duffy	[redacted]	1.80	1,161.00
04/12/2018	B. Schmidt	[redacted]	1.10	324.50
04/13/2018	K. Beneski	[redacted]	0.40	166.00
04/13/2018	B. Schmidt	[redacted]	1.30	383.50
04/14/2018	K. Beneski	[redacted]	2.60	1,079.00
04/15/2018	K. Beneski	[redacted]	2.50	1,037.50

		Redacted		
04/16/2018	K. Beneski	[redacted]	3.60	1,494.00
04/16/2018	B. Duffy	[redacted]	0.30	193.50
04/16/2018	B. Schmidt	[redacted]	4.10	1,209.50
04/17/2018	K. Beneski	[redacted]	1.10	456.50
04/17/2018	B. Duffy	[redacted]	0.50	322.50
04/17/2018	B. Schmidt	[redacted]	3.20	944.00
04/18/2018	K. Beneski	[redacted]	1.20	498.00
04/18/2018	B. Duffy	[redacted]	1.90	1,225.50
04/18/2018	B. Schmidt	[redacted]	6.10	1,799.50

		Redacted		
04/19/2018	B. Duffy		0.90	580.50
04/19/2018	B. Duffy		0.90	580.50
04/19/2018	R. McBride		0.40	216.00
04/22/2018	K. Beneski		0.90	373.50
04/23/2018	K. Beneski		1.10	456.50
04/23/2018	B. Duffy		1.30	838.50
04/23/2018	B. Duffy		0.90	580.50
04/23/2018	B. Duffy		0.80	516.00
04/23/2018	R. McBride		0.40	216.00

		Redacted		
04/23/2018	B. Schmidt		1.20	354.00
04/24/2018	B. Schmidt		4.70	1,386.50
04/25/2018	K. Beneski		0.90	373.50
04/25/2018	B. Duffy		0.60	387.00
04/25/2018	R. McBride		0.40	216.00
04/26/2018	K. Beneski		5.40	2,241.00
04/26/2018	B. Duffy		0.40	258.00
04/26/2018	B. Duffy		0.40	258.00
04/26/2018	B. Duffy		0.40	258.00
04/26/2018	B. Duffy		0.30	193.50

		Redacted		
04/27/2018	B. Duffy		0.40	258.00
04/27/2018	B. Duffy		0.70	451.50
04/27/2018	R. McBride		0.40	216.00
04/29/2018	K. Beneski		0.00	NO CHARGE
04/30/2018	K. Beneski		0.80	332.00
04/30/2018	B. Duffy		0.90	580.50
04/30/2018	R. McBride		1.00	540.00
		Task L320 Subtotal	**78.90**	**$35,941.00**
		L350 Discovery Motions		
04/06/2018	B. Duffy	Redacted	1.10	709.50

04/11/2018	B. Duffy	Redacted	1.20	774.00
04/18/2018	B. Duffy		1.40	903.00
		Task L350 Subtotal	**3.70**	**$2,386.50**
		Phase L300 Total	**94.10**	**$44,494.50**
		L400 Trial Preparation and Trial		
		L410 Fact Witnesses		
04/12/2018	R. McBride	Redacted	1.30	702.00
04/12/2018	R. McBride		2.20	1,188.00
04/13/2018	R. McBride		0.50	270.00
04/16/2018	B. Duffy		0.40	258.00
04/18/2018	B. Duffy		0.30	193.50
04/18/2018	B. Duffy		0.40	258.00

		Redacted		
04/19/2018	B. Duffy	[redacted]	1.80	1,161.00
04/23/2018	B. Duffy	[redacted]	1.20	774.00
04/23/2018	R. McBride	[redacted]	0.40	216.00
04/26/2018	R. McBride	[redacted]	2.90	1,566.00
04/27/2018	R. McBride	[redacted]	1.50	810.00
		Task L410 Subtotal	**12.90**	**$7,396.50**
		L440 Other Preparation/Support		
04/26/2018	L. Williams	Redacted [redacted]	1.90	180.50
		Task L440 Subtotal	**1.90**	**$180.50**
		Phase L400 Total	**14.80**	**$7,577.00**

OUR FEE $112,483.00

COSTS ADVANCED

E100 Expenses

	Postage	24.90
	Computer legal research	27.53
	Reproduction costs	58.92
	Court Document Charge	2.53
	Lane Powell discovery services	15,689.79
04/06/2018	Records obtained from - Whitman County Sheriff, Payment for a public records request, 04/06/18	223.96
04/17/2018	Records obtained from - Office of the Attorney General, Public Records Request 4/17/2018	3.93
04/19/2018	Expert witness fee - - Best Witness, LLC, 04/14/18	2,500.00
04/23/2018	Air fare - - B. Duffy, (Change) To work on case, Boise ID, 03/22/18 - 03/23/18	51.01
04/23/2018	Travel expense - - B. Duffy, Rental car, Spokane WA, 03/16/18	106.86
04/23/2018	Meals while traveling - - B. Duffy, Spokane WA, 03/16/18	83.36
04/23/2018	Meals while traveling - - B. Duffy, 03/22/18	59.78
04/23/2018	Travel expense - - B. Duffy, Rental car, Boise ID, 03/23/18	78.27
04/23/2018	Meals while traveling - - B. Duffy, Boise ID, 03/23/18	31.61
04/23/2018	Meals while traveling - - B. Duffy, Boise ID, 03/23/18	10.06
04/23/2018	Meals while traveling - - B. Duffy, Boise ID, 03/23/18	2.81
04/23/2018	Travel expense - - B. Duffy, Hotel expense, Boise ID, 03/24/18	146.88
04/23/2018	Travel expense - - K. Beneski, Hotel expense, Boise ID, 03/24/18	146.88
04/23/2018	Meals while traveling - - B. Duffy, Boise ID, 03/24/18	26.20
04/23/2018	Air fare - - K. Beneski, (Change) To work on case, Boise ID, 03/22/18 - 03/23/18	188.71
04/23/2018	Travel expense - - B. Duffy, Hotel during case work, Spokane WA, 03/16/18	237.48
04/23/2018	Meals while traveling - - B. Duffy, Spokane WA, 03/16/18	71.30
04/23/2018	Air fare - - B. Duffy, To work on case, Boise ID, 03/22/18 - 03/23/18	432.09
04/23/2018	Air fare - - K. Beneski, To work on case, Boise ID, 03/22/18 - 03/23/18	432.09
04/26/2018	Travel expense - - K Beneski, Lodging for oral arguments, RE: Plaintiff's motion to strike and witness interviews, 03/15/18-03/16/18	237.48

Phase Subtotal	$20,874.43
TOTAL COSTS ADVANCED	$ 20,874.43

RATE SUMMARY

Attorney/Timekeeper	Hours Worked	Billed Per Hour	Bill Amount
B. Duffy	47.00	645.00	30,315.00
R. McBride	20.80	540.00	11,232.00
K. Beneski	29.00	415.00	12,035.00
D. McCurdy	62.20	310.00	19,282.00
A. Schaer	7.90	330.00	2,607.00
S. Reich	93.30	300.00	27,990.00
B. Schmidt	29.90	295.00	8,820.50
L. Williams	1.90	95.00	180.50
E. Rance	0.10	210.00	21.00
Total all Timekeepers	292.10		112,483.00

TOTAL THIS INVOICE $133,357.43

LANE POWELL

Wire Transfer Information:
Wells Fargo Bank
ABA No. 121000248
Account No. 4940605967
Swift Code: WFBIUS6S

Pay by e-Check, Visa, or MC:
*Use **pay my bill***
link at lanepowell.com or call
(206) 223-6288

Remit Payments To:
P.O. Box 91302
Seattle, WA
98111-9402
Attn Cash Receipts
Fax: (206) 223-7107

Identification No. 20-2071651

Hartford Insurance
Attn Melissa Siggia & Paul Gosselin
email: Melissa.Siggia@TheHartford.com
Paul.gosselin@thehartford.com

June 20, 2018
Invoice No. 3764734

cc: J. Craig Swapp
16201 E. Indiana Ave Suite 1900
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Via email: craig@craigswapp.com

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with cost backup

Matter: 131106.000001

adv. Jade Wilcox
Complaints: Wilcox v Swapp Law
Claim No. : Y53 LP 48104
Insured : Swapp Law, PLLC
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PLEASE REFERENCE OUR INVOICE OR MATTER NUMBER WITH YOUR PAYMENT

Payment Due Upon Receipt
A Monthly Interest Charge May Accrue On Unpaid Invoices

Wire Transfer Information:
Wells Fargo Bank
ABA No. 121000248
Account No. 4940605967
Swift Code: WFBIUS6S

Pay by e-Check, Visa, or MC:
Use pay my bill link at lanepowell.com or call (206) 223-6288

Remit Payments To:
P.O. Box 91302
Seattle, WA
98111-9402
Attn Cash Receipts
Fax: (206) 223-7107

Identification No. 20-2071651
June 20, 2018
Invoice No. 3764734

Summary of Account

CURRENT CHARGES - see attached	$188,308.45
PREVIOUS BALANCE as of May 21, 2018	$301,946.83
LESS PAYMENTS RECEIVED	($9,076.65)
TOTAL AMOUNT DUE	$481,178.63

LANE POWELL

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Identification No. 20-2071651

Hartford Insurance
Attn Melissa Siggia & Paul Gosselin
email: Melissa.Siggia@TheHartford.com
Paul.gosselin@thehartford.com

June 20, 2018
Invoice No. 3764734

cc: J. Craig Swapp
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Spokane Valley WA 99216
Via email: craig@craigswapp.com

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FOR PROFESSIONAL SERVICES RENDERED THROUGH 05/31/18

Matter: 131106.000001

adv. Jade Wilcox
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L100 Assessment/Development/Admin
L110 Fact Investigation/Development

05/01/2018	D. McCurdy	Redacted	0.50	155.00
05/01/2018	D. McCurdy		0.70	217.00
05/01/2018	D. McCurdy		1.20	372.00

05/01/2018	S. Reich	Redacted	7.60	2,280.00
05/01/2018	S. Reich		0.40	120.00
05/02/2018	D. McCurdy		0.60	186.00
05/02/2018	D. McCurdy		0.10	31.00
05/02/2018	D. McCurdy		0.80	248.00
05/02/2018	S. Reich		8.50	2,550.00
05/02/2018	S. Reich		0.50	150.00

		Redacted		
05/03/2018	D. McCurdy		2.10	651.00
05/03/2018	D. McCurdy		0.70	217.00
05/03/2018	D. McCurdy		0.60	186.00
05/03/2018	S. Reich		7.80	2,340.00
05/04/2018	D. McCurdy		0.60	186.00
05/04/2018	D. McCurdy		1.60	496.00
05/04/2018	D. McCurdy		0.40	124.00
05/04/2018	S. Reich		0.50	150.00

		Redacted		
05/04/2018	S. Reich		7.90	2,370.00
05/07/2018	B. Duffy		0.90	580.50
05/07/2018	B. Duffy		0.50	322.50
05/07/2018	D. McCurdy		0.40	124.00
05/07/2018	D. McCurdy		0.20	62.00
05/08/2018	B. Duffy		0.30	193.50
05/08/2018	D. McCurdy		0.60	186.00

		Redacted		
05/10/2018	B. Duffy		1.10	709.50
05/10/2018	D. McCurdy		0.40	124.00
05/10/2018	D. McCurdy		0.20	62.00
05/10/2018	B. Schmidt		3.80	1,121.00
05/11/2018	K. Beneski		0.90	373.50
05/11/2018	K. Beneski		3.10	1,286.50
05/11/2018	B. Duffy		0.50	322.50
05/11/2018	R. McBride		1.70	918.00
05/11/2018	D. McCurdy		0.10	31.00

05/11/2018	D. McCurdy	Redacted	0.10	31.00
05/12/2018	K. Beneski		0.80	332.00
05/13/2018	K. Beneski		1.70	705.50
05/14/2018	R. McBride		0.10	54.00
05/14/2018	B. Schmidt		3.70	1,091.50
05/15/2018	B. Duffy		0.50	322.50
05/15/2018	B. Duffy		0.60	387.00
05/16/2018	D. McCurdy		0.60	186.00
05/17/2018	D. McCurdy		0.50	155.00
05/17/2018	D. McCurdy		0.70	217.00

05/17/2018	D. McCurdy	Redacted	0.10	31.00
05/17/2018	S. Reich		3.30	990.00
05/18/2018	B. Duffy		0.60	387.00
05/18/2018	B. Duffy		1.50	967.50
05/18/2018	R. McBride		0.30	162.00
05/21/2018	K. Beneski		4.10	1,701.50
05/21/2018	K. Beneski		2.90	1,203.50
05/21/2018	B. Duffy		1.90	1,225.50
05/21/2018	B. Duffy		1.10	709.50
05/21/2018	B. Duffy		3.50	2,257.50

		Redacted		
05/21/2018	B. Duffy		0.60	387.00
05/21/2018	R. McBride		0.20	108.00
05/21/2018	D. McCurdy		0.30	93.00
05/21/2018	S. Reich		0.90	270.00
05/21/2018	S. Reich		0.60	180.00
05/22/2018	K. Beneski		5.50	2,282.50
05/22/2018	B. Duffy		4.60	2,967.00
05/22/2018	B. Duffy		0.60	387.00

		Redacted		
05/22/2018	D. McCurdy		0.90	279.00
05/22/2018	D. McCurdy		1.70	527.00
05/22/2018	S. Reich		2.90	870.00
05/22/2018	S. Reich		0.60	180.00
05/23/2018	B. Duffy		2.40	1,548.00
05/23/2018	B. Duffy		1.20	774.00

		Redacted		
05/23/2018	D. McCurdy	[redacted]	0.50	155.00
05/23/2018	D. McCurdy	[redacted]	0.30	93.00
05/23/2018	D. McCurdy	[redacted]	0.20	62.00
05/23/2018	S. Reich	[redacted]	1.10	330.00
05/24/2018	B. Duffy	[redacted]	0.60	387.00
05/24/2018	B. Duffy	[redacted]	0.40	258.00
05/24/2018	B. Duffy	[redacted]	1.60	1,032.00
05/24/2018	D. McCurdy	[redacted]	1.30	403.00
05/24/2018	D. McCurdy	[redacted]	1.10	341.00
05/24/2018	D. McCurdy	[redacted]	0.90	279.00
05/24/2018	S. Reich	[redacted]	2.80	840.00

		Redacted		
05/28/2018	D. McCurdy		0.90	279.00
05/29/2018	B. Duffy		0.80	516.00
05/29/2018	D. McCurdy		0.30	93.00
05/29/2018	S. Reich		1.80	540.00
05/30/2018	R. McBride		0.20	108.00
05/30/2018	D. McCurdy		0.30	93.00
05/30/2018	D. McCurdy		0.40	124.00
05/30/2018	S. Reich		2.20	660.00
		Task L110 Subtotal	**127.10**	**$50,007.50**

L120 Analysis/Strategy

05/03/2018	R. McBride	Redacted	1.70	918.00
05/10/2018	K. Beneski		1.70	705.50
05/10/2018	K. Beneski		0.50	207.50
05/10/2018	R. McBride		1.30	702.00
05/10/2018	D. McCurdy		1.30	403.00
05/17/2018	K. Beneski		1.70	705.50
05/18/2018	K. Beneski		0.60	249.00
05/29/2018	A. Schaer		0.60	198.00
05/30/2018	A. Schaer		0.20	66.00
		Task L120 Subtotal	**9.60**	**$4,154.50**
		L130 Experts/Consultants		
05/16/2018	B. Duffy	Redacted	0.20	129.00

		Redacted		
05/23/2018	B. Duffy	[redacted]	0.30	193.50
		Task L130 Subtotal	**0.50**	**$322.50**
		L160 Settlement/Non-Binding ADR		
05/11/2018	B. Duffy	Redacted [redacted]	1.20	774.00
05/14/2018	B. Duffy	[redacted]	0.90	580.50
05/14/2018	R. McBride	[redacted]	0.50	270.00
05/15/2018	B. Duffy	[redacted]	0.90	580.50
05/16/2018	B. Duffy	[redacted]	0.80	516.00
05/18/2018	B. Duffy	[redacted]	0.70	451.50
05/18/2018	R. McBride	[redacted]	0.40	216.00

		Redacted		
05/21/2018	B. Duffy	[redacted]	0.70	451.50
05/22/2018	B. Duffy	[redacted]	0.70	451.50
05/23/2018	B. Duffy	[redacted]	0.30	193.50
05/24/2018	B. Duffy	[redacted]	0.30	193.50
05/29/2018	B. Duffy	[redacted]	0.40	258.00
05/30/2018	B. Duffy	[redacted]	0.50	322.50
05/30/2018	B. Duffy	[redacted]	0.20	129.00
05/31/2018	B. Duffy	[redacted]	0.40	258.00
		Task L160 Subtotal	**8.90**	**$5,646.00**
		Phase L100 Total	**146.10**	**$60,130.50**

L200 Pre-trial Pleadings/Motions
L210 Pleadings

05/02/2018	K. Beneski	Redacted	0.40	166.00
05/02/2018	R. McBride		0.50	270.00
05/09/2018	B. Duffy		0.40	258.00
05/13/2018	D. McCurdy		0.20	62.00
05/14/2018	B. Duffy		0.70	451.50
05/14/2018	D. McCurdy		0.80	248.00
05/14/2018	D. McCurdy		0.40	124.00
05/14/2018	D. McCurdy		0.40	124.00
05/15/2018	D. McCurdy		1.90	589.00
05/16/2018	B. Duffy		0.30	193.50
05/16/2018	D. McCurdy		0.10	31.00
05/16/2018	D. McCurdy		1.50	465.00

		Redacted		
05/17/2018	D. McCurdy		0.40	124.00
05/18/2018	B. Duffy		0.80	516.00
05/23/2018	D. McCurdy		0.50	155.00
05/25/2018	D. McCurdy		0.70	217.00
05/26/2018	B. Duffy		0.40	258.00
05/29/2018	B. Duffy		0.30	193.50
05/30/2018	B. Duffy		0.50	322.50
05/30/2018	B. Duffy		0.40	258.00
		Task L210 Subtotal	**11.60**	**$5,026.00**
		L240 Dispositive Motions		
05/03/2018	B. Duffy	Redacted	0.40	258.00
		Task L240 Subtotal	**0.40**	**$258.00**
		L250 Other Written Motions/Submissions		
05/02/2018	B. Duffy	Redacted	0.50	322.50
05/03/2018	B. Duffy		0.40	258.00

		Redacted		
05/10/2018	B. Duffy		0.80	516.00
05/11/2018	B. Duffy		1.10	709.50
05/14/2018	B. Duffy		0.50	322.50
05/14/2018	R. McBride		0.20	108.00
05/23/2018	B. Duffy		0.80	516.00
05/26/2018	B. Duffy		0.70	451.50
05/29/2018	B. Duffy		0.70	451.50
		Task L250 Subtotal	**5.70**	**$3,655.50**

		Phase L200 Total	**17.70**	**$8,939.50**
		L300 Discovery		
		L310 Written Discovery		
05/01/2018	K. Beneski	Redacted	0.50	207.50
05/01/2018	B. Duffy		0.50	322.50
05/03/2018	K. Beneski		1.10	456.50
05/04/2018	R. McBride		0.30	162.00
05/09/2018	K. Beneski		1.90	788.50
05/09/2018	B. Duffy		0.90	580.50
05/09/2018	B. Duffy		0.60	387.00
05/10/2018	B. Duffy		0.40	258.00
05/10/2018	R. McBride		0.70	378.00

		Redacted		
05/13/2018	K. Beneski		0.70	290.50
05/13/2018	B. Duffy		0.90	580.50
05/15/2018	K. Beneski		0.70	290.50
05/15/2018	B. Duffy		0.50	322.50
05/15/2018	B. Duffy		0.50	322.50
05/15/2018	B. Duffy		0.40	258.00
05/15/2018	R. McBride		0.20	108.00
05/17/2018	B. Duffy		1.30	838.50
05/17/2018	R. McBride		0.40	216.00
05/18/2018	B. Duffy		0.60	387.00
05/24/2018	B. Duffy		0.30	193.50
		Task L310 Subtotal	**13.40**	**$7,348.00**

L320 Document Production

05/01/2018	K. Beneski	Redacted	0.50	207.50
05/01/2018	B. Duffy		1.50	967.50
05/01/2018	B. Duffy		1.30	838.50
05/01/2018	B. Schmidt		6.10	1,799.50
05/02/2018	K. Beneski		3.00	1,245.00
05/02/2018	B. Duffy		1.40	903.00
05/02/2018	R. McBride		0.90	486.00
05/02/2018	B. Schmidt		4.90	1,445.50
05/03/2018	K. Beneski		2.70	1,120.50

		responsive information Redacted		
05/03/2018	B. Duffy		1.70	1,096.50
05/03/2018	R. McBride		1.50	810.00
05/03/2018	B. Schmidt		5.60	1,652.00
05/04/2018	K. Beneski		4.20	1,743.00
05/04/2018	B. Duffy		0.90	580.50
05/04/2018	R. McBride		0.50	270.00
05/04/2018	B. Schmidt		5.70	1,681.50
05/07/2018	K. Beneski		0.80	332.00
05/07/2018	R. McBride		3.00	1,620.00

05/07/2018	S. Reich	Redacted	5.80	1,740.00
05/07/2018	S. Reich		0.60	180.00
05/07/2018	B. Schmidt		4.70	1,386.50
05/08/2018	K. Beneski		0.20	83.00
05/08/2018	R. McBride		5.10	2,754.00
05/08/2018	S. Reich		1.40	420.00
05/08/2018	S. Reich		2.70	810.00
05/08/2018	B. Schmidt		7.60	2,242.00
05/09/2018	K. Beneski		1.80	747.00
05/09/2018	R. McBride		3.80	2,052.00

		Redacted		
05/09/2018	R. McBride		0.40	216.00
05/09/2018	S. Reich		2.90	870.00
05/09/2018	S. Reich		0.50	150.00
05/09/2018	B. Schmidt		4.10	1,209.50
05/10/2018	K. Beneski		0.40	166.00
05/10/2018	B. Duffy		0.40	258.00
05/10/2018	R. McBride		2.30	1,242.00
05/11/2018	R. McBride		0.30	162.00
05/14/2018	R. McBride		1.10	594.00
05/15/2018	B. Duffy		0.70	451.50

		Redacted		
05/15/2018	R. McBride		1.40	756.00
05/16/2018	B. Duffy		1.20	774.00
05/17/2018	K. Beneski		0.90	373.50
05/17/2018	K. Beneski		2.30	954.50
05/17/2018	B. Schmidt		2.40	708.00
05/18/2018	K. Beneski		0.30	124.50
05/18/2018	B. Duffy		0.70	451.50
05/21/2018	B. Schmidt		0.80	236.00
05/22/2018	B. Duffy		0.70	451.50
05/22/2018	S. Reich		0.90	270.00

Redacted

05/23/2018	K. Beneski	0.50	207.50
05/23/2018	B. Duffy	0.30	193.50
05/24/2018	B. Duffy	1.40	903.00
05/24/2018	B. Duffy	0.50	322.50
05/24/2018	R. McBride	0.30	162.00
05/24/2018	S. Reich	0.30	90.00
05/26/2018	B. Duffy	0.50	322.50
05/29/2018	B. Duffy	0.90	580.50

05/30/2018	B. Duffy	Redacted	0.30	193.50
05/30/2018	B. Duffy		0.70	451.50
05/30/2018	R. McBride		0.10	54.00
05/30/2018	S. Reich		0.20	60.00
05/30/2018	S. Reich		0.20	60.00
05/31/2018	B. Duffy		0.40	258.00
		Task L320 Subtotal	**111.20**	**$45,490.00**
		L330 Depositions		
05/18/2018	B. Schmidt	Redacted	3.30	973.50
		Task L330 Subtotal	**3.30**	**$973.50**
		Phase L300 Total	**127.90**	**$53,811.50**
		L400 Trial Preparation and Trial		
		L410 Fact Witnesses		
05/14/2018	K. Beneski	Redacted	5.40	2,241.00
05/15/2018	K. Beneski		1.60	664.00
05/17/2018	K. Beneski		0.70	290.50

		Redacted		
05/18/2018	K. Beneski	[redacted]	0.40	166.00
05/18/2018	K. Beneski	[redacted]	0.70	290.50
05/18/2018	K. Beneski	[redacted]	0.90	373.50
05/22/2018	K. Beneski	[redacted]	1.20	498.00
05/23/2018	K. Beneski	[redacted]	1.40	581.00
05/23/2018	K. Beneski	[redacted]	0.70	290.50
05/23/2018	K. Beneski	[redacted]	3.00	1,245.00
05/23/2018	K. Beneski	[redacted]	1.10	456.50
05/23/2018	K. Beneski	[redacted]	2.00	830.00
05/24/2018	K. Beneski	[redacted]	0.70	290.50
		Task L410 Subtotal	**19.80**	**$8,217.00**
		Phase L400 Total	**19.80**	**$8,217.00**

OUR FEE $131,098.50

COSTS ADVANCED

E100 Expenses

	Postage	5.68
	Reproduction costs	94.50
	Court Document Charge	2.20
	Lane Powell discovery services	6,518.71
	Messenger and courier service	31.59
05/14/2018	Professional services - Discovia, 3/27/18 - 4/24/18	50,323.35
05/18/2018	Outside photocopy service - - WSP Collision Records, copies of public records (fact investigation) 4/20/2018	10.50
05/31/2018	Outside photocopy service - - Inventus LLC, 5/17/18	223.42
	Phase Subtotal	$57,209.95

TOTAL COSTS ADVANCED $ 57,209.95

RATE SUMMARY

Attorney/Timekeeper	Hours Worked	Billed Per Hour	Bill Amount
B. Duffy	66.40	645.00	42,828.00
R. McBride	29.40	540.00	15,876.00
K. Beneski	66.20	415.00	27,473.00
D. McCurdy	31.10	310.00	9,641.00
A. Schaer	0.80	330.00	264.00
S. Reich	64.90	300.00	19,470.00
B. Schmidt	52.70	295.00	15,546.50
Total all Timekeepers	311.50		131,098.50

TOTAL THIS INVOICE $188,308.45

LANE POWELL

Wire Transfer Information:
Wells Fargo Bank
ABA No. 121000248
Account No. 4940605967
Swift Code: WFBIUS6S

Pay by e-Check, Visa, or MC:
Use **pay my bill**
link at lanepowell.com or call
(206) 223-6288

Remit Payments To:
P.O. Box 91302
Seattle, WA
98111-9402
Attn Cash Receipts
Fax: (206) 223-7107

Identification No. 20-2071651

Hartford Insurance
Attn Melissa Siggia & Paul Gosselin
email: Melissa.Siggia@TheHartford.com
Paul.gosselin@thehartford.com

July 13, 2018
Invoice No. 3766921

cc: J. Craig Swapp
16201 E. Indiana Ave Suite 1900
Spokane Valley WA 99216
Via email: craig@craigswapp.com

EBILL Hartford via Bottomline - Law.eXchange
with cost backup

Matter: 131106.000001

adv. Jade Wilcox
Complaints: Wilcox v Swapp Law
Claim No. : Y53 LP 48104
Insured : Swapp Law, PLLC
Policy No. : 34 SBA PF6578
Corporate ID : Y53LP48104

Summary of Account

CURRENT CHARGES - see attached	$117,745.45
PREVIOUS BALANCE as of June 20, 2018	$481,178.63
TOTAL AMOUNT DUE	$598,924.08

PLEASE REFERENCE OUR INVOICE OR MATTER NUMBER WITH YOUR PAYMENT

Payment Due Upon Receipt
A Monthly Interest Charge May Accrue On Unpaid Invoices

Wire Transfer Information:
Wells Fargo Bank
ABA No. 121000248
Account No. 4940605967
Swift Code: WFBIUS6S

Pay by e-Check, Visa, or MC:
Use **pay my bill** link at lanepowell.com or call (206) 223-6288

Remit Payments To:
P.O. Box 91302
Seattle, WA
98111-9402
Attn Cash Receipts
Fax: (206) 223-7107

Identification No. 20-2071651

Hartford Insurance
Attn Melissa Siggia & Paul Gosselin
email: Melissa.Siggia@TheHartford.com
Paul.gosselin@thehartford.com

July 13, 2018
Invoice No. 3766921

cc: J. Craig Swapp
16201 E. Indiana Ave Suite 1900
Spokane Valley WA 99216
Via email: craig@craigswapp.com

EBILL Hartford via Bottomline - Law.eXchange
with cost backup

FOR PROFESSIONAL SERVICES RENDERED THROUGH 06/30/18

Matter: 131106.000001

adv. Jade Wilcox
Complaints: Wilcox v Swapp Law
Claim No. : Y53 LP 48104
Insured : Swapp Law, PLLC
Policy No. : 34 SBA PF6578
Corporate ID : Y53LP48104

L100 Assessment/Development/Admin
L110 Fact Investigation/Development

06/01/2018	B. Duffy	Redacted	0.90	580.50
06/01/2018	D. McCurdy		1.30	403.00
06/04/2018	R. McBride		0.30	162.00

		Redacted		
06/04/2018	D. McCurdy		3.60	1,116.00
06/05/2018	D. McCurdy		1.00	310.00
06/05/2018	D. McCurdy		0.50	155.00
06/05/2018	S. Reich		1.20	360.00
06/06/2018	D. McCurdy		0.00	NO CHARGE
06/06/2018	D. McCurdy		0.00	NO CHARGE
06/07/2018	D. McCurdy		0.50	155.00
06/07/2018	T. Washburn		2.20	990.00
06/08/2018	D. McCurdy		1.30	403.00
06/11/2018	B. Duffy		0.60	387.00
06/11/2018	B. Duffy		0.50	322.50

		Redacted		
06/11/2018	D. McCurdy	[redacted]	0.20	62.00
06/12/2018	B. Duffy	[redacted]	1.90	1,225.50
06/12/2018	D. McCurdy	[redacted]	0.20	62.00
06/13/2018	R. McBride	[redacted]	0.20	108.00
06/13/2018	R. McBride	[redacted]	2.20	1,188.00
06/13/2018	D. McCurdy	[redacted]	1.50	465.00
06/13/2018	T. Washburn	[redacted]	0.20	90.00
06/14/2018	R. McBride	[redacted]	2.50	1,350.00
06/14/2018	R. McBride	[redacted]	0.60	324.00
06/14/2018	D. McCurdy	[redacted]	0.50	155.00

		Redacted		
06/14/2018	D. McCurdy		0.20	62.00
06/15/2018	R. McBride		0.10	54.00
06/15/2018	R. McBride		1.50	810.00
06/15/2018	R. McBride		0.20	108.00
06/15/2018	D. McCurdy		0.30	93.00
06/15/2018	D. McCurdy		0.20	62.00
06/18/2018	R. McBride		0.50	270.00
06/18/2018	D. McCurdy		0.20	62.00
06/18/2018	D. McCurdy		0.90	279.00
06/19/2018	B. Duffy		2.20	1,419.00
06/19/2018	R. McBride		0.20	108.00

		Redacted		
06/19/2018	R. McBride		0.50	270.00
06/19/2018	D. McCurdy		2.20	682.00
06/19/2018	D. McCurdy		1.50	465.00
06/19/2018	S. Reich		3.60	1,080.00
06/20/2018	D. McCurdy		0.20	62.00
06/21/2018	R. McBride		3.30	1,782.00
06/21/2018	D. McCurdy		0.70	217.00

06/25/2018	B. Duffy	Redacted	0.30	193.50
06/25/2018	R. McBride		0.40	216.00
06/26/2018	D. McCurdy		0.30	93.00
06/27/2018	B. Duffy		0.40	258.00
06/27/2018	B. Duffy		0.40	258.00
06/27/2018	B. Duffy		0.50	322.50
06/27/2018	R. McBride		0.20	108.00
06/28/2018	D. McCurdy		1.60	496.00
06/29/2018	D. McCurdy		0.80	248.00
		Task L110 Subtotal	**47.30**	**$20,451.50**

L120 Analysis/Strategy

06/05/2018	R. McBride	Redacted	1.50	810.00
06/08/2018	D. McCurdy		0.40	124.00
06/12/2018	R. McBride		1.10	594.00
06/12/2018	S. Reich		1.20	360.00
06/12/2018	T. Washburn		1.10	495.00
06/14/2018	S. Reich		0.80	240.00
06/19/2018	S. Reich		0.80	240.00
06/20/2018	S. Reich		5.60	1,680.00
06/26/2018	S. Reich		2.80	840.00

		Redacted		
		Task L120 Subtotal	**15.30**	**$5,383.00**
		L130 Experts/Consultants		
06/04/2018	B. Duffy	Redacted	0.30	193.50
06/11/2018	B. Duffy		0.30	193.50
		Task L130 Subtotal	**0.60**	**$387.00**
		L140 Document/File Management		
06/20/2018	S. Reich	Redacted	0.30	90.00
		Task L140 Subtotal	**0.30**	**$90.00**
		L160 Settlement/Non-Binding ADR		
06/04/2018	B. Duffy	Redacted	0.60	387.00
06/05/2018	B. Duffy		0.20	129.00
06/07/2018	B. Duffy		0.40	258.00

		Redacted		
06/12/2018	B. Duffy		0.70	451.50
06/14/2018	B. Duffy		0.70	451.50
06/20/2018	B. Duffy		0.40	258.00
		Task L160 Subtotal	**3.00**	**$1,935.00**
		Phase L100 Total	**66.50**	**$28,246.50**
		L200 Pre-trial Pleadings/Motions		
		L240 Dispositive Motions		
06/08/2018	R. McBride	Redacted	0.30	162.00
		Task L240 Subtotal	**0.30**	**$162.00**
		L250 Other Written Motions/Submissions		
06/05/2018	B. Duffy	Redacted	0.80	516.00
		Task L250 Subtotal	**0.80**	**$516.00**
		Phase L200 Total	**1.10**	**$678.00**
		L300 Discovery		
		L310 Written Discovery		
06/14/2018	K. Beneski	Redacted	0.50	207.50
06/15/2018	T. Washburn		0.60	270.00
06/19/2018	B. Duffy		0.50	322.50

		Redacted		
06/19/2018	B. Duffy		1.90	1,225.50
06/20/2018	B. Duffy		0.60	387.00
06/20/2018	B. Duffy		0.60	387.00
06/21/2018	T. Washburn		1.60	720.00
06/23/2018	B. Duffy		0.50	322.50
06/25/2018	B. Duffy		0.50	322.50
06/25/2018	B. Duffy		0.60	387.00
06/25/2018	B. Duffy		0.40	258.00
06/25/2018	T. Washburn		2.10	945.00
06/26/2018	B. Duffy		0.60	387.00
06/28/2018	B. Duffy		0.90	580.50

		Redacted		
06/28/2018	T. Washburn		0.50	225.00
06/28/2018	T. Washburn		0.80	360.00
06/29/2018	T. Washburn		1.30	585.00
06/30/2018	R. McBride		0.10	54.00
		Task L310 Subtotal	**14.60**	**$7,946.00**
		L320 Document Production		
06/01/2018	B. Duffy	Redacted	0.70	451.50
06/04/2018	B. Duffy		0.60	387.00
06/04/2018	B. Duffy		0.80	516.00
06/04/2018	B. Duffy		1.40	903.00

		Redacted		
06/05/2018	B. Schmidt		5.70	1,681.50
06/06/2018	B. Duffy		0.80	516.00
06/06/2018	S. Reich		0.30	90.00
06/06/2018	S. Reich		0.20	60.00
06/07/2018	R. McBride		0.20	108.00
06/07/2018	S. Reich		0.90	270.00
06/11/2018	B. Duffy		0.60	387.00
06/11/2018	B. Duffy		0.70	451.50
06/11/2018	S. Reich		0.40	120.00
06/12/2018	S. Reich		0.30	90.00

		Redacted		
06/13/2018	B. Duffy		0.50	322.50
06/13/2018	S. Reich		0.60	180.00
06/15/2018	S. Reich		0.40	120.00
06/18/2018	S. Reich		0.70	210.00
06/19/2018	S. Reich		0.90	270.00
06/20/2018	B. Schmidt		1.30	383.50
06/26/2018	S. Reich		0.60	180.00

		Redacted		
06/26/2018	S. Reich		1.40	420.00
06/27/2018	S. Reich		1.30	390.00
06/28/2018	B. Schmidt		1.20	354.00
06/29/2018	B. Schmidt		0.30	88.50
		Task L320 Subtotal	**22.80**	**$8,950.00**
		L330 Depositions		
06/05/2018	B. Duffy	Redacted	0.70	451.50

		Redacted		
06/05/2018	B. Duffy		1.10	709.50
06/06/2018	B. Duffy		0.90	580.50
06/06/2018	B. Duffy		0.60	387.00
06/06/2018	R. McBride		0.50	270.00
06/07/2018	B. Duffy		0.40	258.00
06/07/2018	B. Duffy		0.30	193.50
06/11/2018	B. Duffy		0.60	387.00
06/11/2018	B. Duffy		0.60	387.00

06/11/2018	B. Duffy	Redacted	0.50	322.50
06/11/2018	B. Duffy		0.70	451.50
06/11/2018	R. McBride		0.40	216.00
06/12/2018	B. Duffy		0.30	193.50
06/12/2018	S. Reich		1.20	360.00
06/13/2018	B. Duffy		0.60	387.00
06/13/2018	S. Reich		1.60	480.00

		Redacted		
06/14/2018	B. Duffy		1.60	1,032.00
06/15/2018	B. Duffy		0.60	387.00
06/15/2018	B. Duffy		2.10	1,354.50
06/15/2018	B. Duffy		0.40	258.00
06/15/2018	B. Duffy		1.10	709.50
06/15/2018	S. Reich		2.80	840.00
06/15/2018	T. Washburn		1.10	495.00
06/17/2018	B. Duffy		0.60	387.00

		Redacted		
06/17/2018	B. Duffy		2.50	1,612.50
06/18/2018	B. Duffy		11.50	7,417.50
06/18/2018	T. Washburn		8.50	3,825.00
06/18/2018	T. Washburn		3.40	1,530.00
06/19/2018	R. McBride		1.10	594.00
06/19/2018	T. Washburn		1.10	495.00
06/20/2018	B. Duffy		0.60	387.00
06/21/2018	B. Duffy		2.60	1,677.00
06/21/2018	B. Duffy		4.80	3,096.00
06/21/2018	B. Schmidt		0.90	265.50

06/22/2018	B. Duffy	Redacted	1.60	1,032.00
06/22/2018	B. Duffy		5.40	3,483.00
06/22/2018	B. Duffy		2.30	1,483.50
06/25/2018	B. Duffy		0.40	258.00
06/26/2018	R. McBride		2.10	1,134.00
06/27/2018	B. Duffy		2.30	1,483.50
06/27/2018	B. Duffy		0.50	322.50
06/28/2018	B. Duffy		0.90	580.50
06/28/2018	B. Duffy		0.70	451.50
06/29/2018	B. Duffy		2.40	1,548.00

		Redacted		
06/29/2018	R. McBride		0.80	432.00
06/29/2018	T. Washburn		0.80	360.00
06/30/2018	B. Duffy		4.20	2,709.00
		Task L330 Subtotal	**82.70**	**$47,674.50**
		L350 Discovery Motions		
06/06/2018	B. Duffy	Redacted	0.60	387.00
06/07/2018	K. Beneski		3.10	1,286.50
06/08/2018	K. Beneski		3.40	1,411.00
06/08/2018	R. McBride		1.40	756.00

		Redacted		
06/11/2018	K. Beneski	[redacted]	2.50	1,037.50
06/12/2018	K. Beneski	[redacted]	0.50	207.50
06/13/2018	B. Duffy	[redacted]	0.90	580.50
06/13/2018	R. McBride	[redacted]	0.80	432.00
06/13/2018	D. McCurdy	[redacted]	0.20	62.00
06/14/2018	K. Beneski	[redacted]	1.40	581.00
06/14/2018	B. Duffy	[redacted]	0.40	258.00
06/14/2018	B. Duffy	[redacted]	1.20	774.00
06/14/2018	R. McBride	[redacted]	0.30	162.00
06/20/2018	B. Duffy	[redacted]	1.10	709.50
06/20/2018	R. McBride	[redacted]	0.40	216.00
06/20/2018	S. Reich	[redacted]	0.80	240.00

		Redacted		
06/27/2018	B. Duffy		0.60	387.00
06/28/2018	T. Washburn		1.60	720.00
06/30/2018	B. Duffy		0.30	193.50
		Task L350 Subtotal	**21.50**	**$10,401.00**
		Phase L300 Total	**141.60**	**$74,971.50**
		L400 Trial Preparation and Trial		
		L410 Fact Witnesses		
06/14/2018	K. Beneski	Redacted	0.50	207.50
		Task L410 Subtotal	**0.50**	**$207.50**
		Phase L400 Total	**0.50**	**$207.50**

OUR FEE $104,103.50

COSTS ADVANCED

E100 Expenses

	Lane Powell discovery services	4,668.41
	Court Document Charge	22.68
06/05/2018	Professional services - Discovia, May 2018; Total of $10,323.43 less $3,000.00 Professional Consideration	7,323.43
06/06/2018	Outside photocopy service - - Inventus LLC, 5/30/18	302.91
06/20/2018	Travel expense - - K. Beneski, Lodging to conduct witness interviews, Spokane WA, 05/23/18	498.12
06/20/2018	Meals while traveling - - K. Beneski, Spokane WA, 05/23/18	25.76
06/27/2018	Travel expense - - B. Duffy, Uber home from airport, Seattle WA, 05/24/18	44.32
06/27/2018	Air fare - - B. Duffy, Travel to work on Swapp case, Spokane WA, 05/21/18 - 05/24/18	159.70

06/27/2018	Air fare - - K. Beneski, Travel to work on case, Spokane WA, 05/21/18 - 05/23/18	354.39
06/27/2018	Meals while traveling - - B. Duffy, RE: Swapp case, Spokane WA, 05/22/18	37.55
06/27/2018	Travel expense - - B. Duffy, Rental car to visit client offices, Spokane WA, 05/23/18	148.56
06/27/2018	Travel expense - - B. Duffy, Uber to airport, Spokane WA, 05/24/18	24.20
06/27/2018	Travel expense - - B. Duffy, Uber to airport to fly to Spokane, Seattle WA, 05/21/18	31.92
	Phase Subtotal	$13,641.95

TOTAL COSTS ADVANCED $ 13,641.95

RATE SUMMARY

Attorney/Timekeeper	Hours Worked	Billed Per Hour	Bill Amount
B. Duffy	86.80	645.00	55,986.00
R. McBride	23.70	540.00	12,798.00
K. Beneski	11.90	415.00	4,938.50
D. McCurdy	20.30	310.00	6,293.00
T. Washburn	26.90	450.00	12,105.00
S. Reich	30.70	300.00	9,210.00
B. Schmidt	9.40	295.00	2,773.00
Total all Timekeepers	209.70		104,103.50

TOTAL THIS INVOICE $117,745.45

LANE POWELL

Wire Transfer Information:
Wells Fargo Bank
ABA No. 121000248
Account No. 4940605967
Swift Code: WFBIUS6S

Pay by e-Check, Visa, or MC:
Use **pay my bill**
link at lanepowell.com or call
(206) 223-6288

Remit Payments To:
P.O. Box 91302
Seattle, WA
98111-9402
Attn Cash Receipts
Fax: (206) 223-7107

Identification No. 20-2071651

Hartford Insurance
Attn Melissa Siggia & Paul Gosselin
email: Melissa.Siggia@TheHartford.com
Paul.gosselin@thehartford.com

August 8, 2018
Invoice No. 3768792

cc: J. Craig Swapp
16201 E. Indiana Ave Suite 1900
Spokane Valley WA 99216
Via email: craig@craigswapp.com

EBILL Hartford via Bottomline - Law.eXchange
with cost backup

Matter: 131106.000001

adv. Jade Wilcox
Complaints: Wilcox v Swapp Law
Claim No. : Y53 LP 48104
Insured : Swapp Law, PLLC
Policy No. : 34 SBA PF6578
Corporate ID : Y53LP48104

Summary of Account

CURRENT CHARGES - see attached	$134,418.85
PREVIOUS BALANCE as of July 13, 2018	$598,924.08
TOTAL AMOUNT DUE	$733,342.93

PLEASE REFERENCE OUR INVOICE OR MATTER NUMBER WITH YOUR PAYMENT

Payment Due Upon Receipt
A Monthly Interest Charge May Accrue On Unpaid Invoices

LANE POWELL

Wire Transfer Information:
Wells Fargo Bank
ABA No. 121000248
Account No. 4940605967
Swift Code: WFBIUS6S

Pay by e-Check, Visa, or MC:
Use **pay my bill**
link at lanepowell.com or call
(206) 223-6288

Remit Payments To:
P.O. Box 91302
Seattle, WA
98111-9402
Attn Cash Receipts
Fax: (206) 223-7107

Identification No. 20-2071651

Hartford Insurance
Attn Melissa Siggia & Paul Gosselin
email: Melissa.Siggia@TheHartford.com
Paul.gosselin@thehartford.com

August 8, 2018
Invoice No. 3768792

cc: J. Craig Swapp
16201 E. Indiana Ave Suite 1900
Spokane Valley WA 99216
Via email: craig@craigswapp.com

EBILL Hartford via Bottomline - Law.eXchange
with cost backup

FOR PROFESSIONAL SERVICES RENDERED THROUGH 07/31/18

Matter: 131106.000001

adv. Jade Wilcox
Complaints: Wilcox v Swapp Law
Claim No. : Y53 LP 48104
Insured : Swapp Law, PLLC
Policy No. : 34 SBA PF6578
Corporate ID : Y53LP48104

L100 Assessment/Development/Admin
L110 Fact Investigation/Development

07/02/2018	D. McCurdy	Redacted	0.30	93.00
07/03/2018	R. McBride		0.50	270.00
07/05/2018	R. McBride		4.10	2,214.00

07/05/2018	D. McCurdy	Redacted	4.50	1,395.00
07/06/2018	R. McBride		4.20	2,268.00
07/06/2018	D. McCurdy		1.80	558.00
07/06/2018	D. McCurdy		2.30	713.00
07/06/2018	S. Reich		5.10	1,530.00
07/09/2018	R. McBride		3.50	1,890.00
07/09/2018	D. McCurdy		0.30	93.00
07/09/2018	S. Reich		6.70	2,010.00

		Redacted		
07/09/2018	S. Reich		0.30	90.00
07/10/2018	R. McBride		3.00	1,620.00
07/10/2018	D. McCurdy		0.30	93.00
07/10/2018	D. McCurdy		3.00	930.00
07/11/2018	D. McCurdy		2.50	775.00
07/11/2018	D. McCurdy		0.80	248.00
07/11/2018	D. McCurdy		1.40	434.00
07/12/2018	R. McBride		0.20	108.00
07/16/2018	S. Reich		0.60	180.00

		Redacted		
07/17/2018	R. McBride		2.70	1,458.00
07/18/2018	R. McBride		2.50	1,350.00
07/25/2018	B. Duffy		0.70	451.50
07/25/2018	R. McBride		1.60	864.00
07/27/2018	R. McBride		0.10	54.00
		Task L110 Subtotal	**53.00**	**$21,689.50**
		L120 Analysis/Strategy		
06/12/2018	D. McCurdy	Redacted	1.60	496.00
07/03/2018	B. Duffy		0.20	129.00
07/06/2018	B. Duffy		0.30	193.50
07/09/2018	B. Duffy		0.20	129.00

		Redacted		
07/10/2018	S. Reich	[redacted]	0.30	90.00
07/10/2018	S. Reich	[redacted]	0.40	120.00
07/11/2018	D. McCurdy	[redacted]	1.10	341.00
07/11/2018	S. Reich	[redacted]	3.10	930.00
07/17/2018	R. McBride	[redacted]	0.30	162.00
07/19/2018	B. Duffy	[redacted]	0.40	258.00
07/20/2018	R. McBride	[redacted]	0.60	324.00
07/25/2018	R. McBride	[redacted]	0.20	108.00
		Task L120 Subtotal	**8.70**	**$3,280.50**

		L140 Document/File Management		
07/10/2018	S. Reich	Redacted	5.60	1,680.00
		Task L140 Subtotal	**5.60**	**$1,680.00**
		Phase L100 Total	**67.30**	**$26,650.00**
		L200 Pre-trial Pleadings/Motions		
		L210 Pleadings		
07/03/2018	T. Washburn	Redacted	2.60	1,170.00
07/05/2018	T. Washburn		1.60	720.00
07/06/2018	T. Washburn		3.40	1,530.00
07/09/2018	T. Washburn		3.00	1,350.00

		Redacted		
07/10/2018	T. Washburn		1.40	630.00
07/11/2018	T. Washburn		2.30	1,035.00
07/12/2018	T. Washburn		4.70	2,115.00
07/13/2018	T. Washburn		8.80	3,960.00
07/16/2018	T. Washburn		2.60	1,170.00

07/17/2018	T. Washburn	Redacted	7.70	3,465.00
		Task L210 Subtotal	**38.10**	**$17,145.00**
		L250 Other Written Motions/Submissions		
07/03/2018	B. Duffy	Redacted	0.80	516.00
07/05/2018	B. Duffy		0.90	580.50
07/05/2018	B. Duffy		1.10	709.50
07/09/2018	B. Duffy		0.70	451.50
07/11/2018	B. Duffy		0.80	516.00
07/11/2018	B. Duffy		0.90	580.50
		Task L250 Subtotal	**5.20**	**$3,354.00**

		Phase L200 Total	**43.30**	**$20,499.00**
		L300 Discovery		
		L310 Written Discovery		
07/03/2018	B. Duffy	Redacted	0.40	258.00
07/12/2018	R. McBride		2.10	1,134.00
07/12/2018	R. McBride		0.20	108.00
07/17/2018	B. Duffy		0.40	258.00
07/17/2018	B. Duffy		0.40	258.00
07/17/2018	R. McBride		0.20	108.00
07/17/2018	S. Reich		2.30	690.00
07/18/2018	B. Duffy		0.50	322.50
07/18/2018	B. Duffy		0.80	516.00

07/19/2018	B. Duffy	Redacted	0.80	516.00
		Task L310 Subtotal	**8.10**	**$4,168.50**
		L320 Document Production		
07/02/2018	S. Reich	Redacted	0.60	180.00
07/05/2018	B. Duffy		0.60	387.00
07/05/2018	B. Duffy		0.30	193.50
07/09/2018	B. Duffy		0.80	516.00
07/10/2018	B. Duffy		1.70	1,096.50
07/10/2018	B. Duffy		0.40	258.00
07/10/2018	S. Reich		0.70	210.00

		Redacted		
07/10/2018	B. Schmidt	[redacted]	2.60	767.00
07/11/2018	B. Duffy	[redacted]	0.70	451.50
07/11/2018	B. Duffy	[redacted]	0.50	322.50
07/11/2018	S. Reich	[redacted]	1.40	420.00
07/11/2018	S. Reich	[redacted]	1.10	330.00
07/12/2018	B. Duffy	[redacted]	0.30	193.50
07/13/2018	S. Reich	[redacted]	1.20	360.00
07/13/2018	S. Reich	[redacted]	0.70	210.00
07/16/2018	B. Duffy	[redacted]	0.60	387.00
07/16/2018	S. Reich	[redacted]	0.40	120.00

		Redacted		
07/16/2018	S. Reich		0.30	90.00
07/17/2018	S. Reich		0.30	90.00
07/17/2018	S. Reich		0.30	90.00
07/23/2018	S. Reich		0.40	120.00
07/25/2018	B. Duffy		0.30	193.50
		Task L320 Subtotal	**16.20**	**$6,986.00**
		L330 Depositions		
07/01/2018	T. Washburn	Redacted	0.20	90.00
07/02/2018	B. Duffy		1.10	709.50
07/02/2018	B. Duffy		8.90	5,740.50
07/02/2018	T. Washburn		1.60	720.00
07/03/2018	B. Duffy		1.30	838.50

		Redacted		
07/05/2018	B. Duffy		0.30	193.50
07/05/2018	B. Duffy		0.60	387.00
07/06/2018	B. Duffy		0.30	193.50
07/09/2018	B. Duffy		0.70	451.50
07/10/2018	B. Duffy		0.50	322.50
07/11/2018	B. Duffy		0.70	451.50
07/11/2018	B. Duffy		0.70	451.50
07/11/2018	B. Duffy		0.50	322.50
07/11/2018	B. Duffy		0.40	258.00

07/12/2018	B. Duffy	Redacted	1.30	838.50
07/12/2018	B. Duffy		0.50	322.50
07/12/2018	S. Reich		0.30	90.00
07/13/2018	B. Duffy		0.40	258.00
07/13/2018	S. Reich		0.60	180.00
07/13/2018	S. Reich		0.10	30.00
07/16/2018	S. Reich		0.80	240.00
07/17/2018	S. Reich		0.40	120.00

07/18/2018	B. Duffy	Redacted	0.20	129.00
07/18/2018	B. Duffy		0.50	322.50
07/18/2018	B. Duffy		0.50	322.50
07/18/2018	S. Reich		2.20	660.00
07/18/2018	T. Washburn		1.90	855.00
07/19/2018	B. Duffy		0.80	516.00
07/19/2018	S. Reich		0.10	30.00
07/19/2018	S. Reich		1.20	360.00
07/19/2018	S. Reich		1.10	330.00

07/19/2018	T. Washburn	Redacted	1.30	585.00
07/20/2018	B. Duffy		0.30	193.50
07/20/2018	S. Reich		1.10	330.00
07/20/2018	S. Reich		1.10	330.00
07/23/2018	B. Duffy		0.50	322.50
07/23/2018	R. McBride		2.70	1,458.00
07/23/2018	S. Reich		0.60	180.00
07/23/2018	S. Reich		2.10	630.00
07/23/2018	T. Washburn		0.70	315.00

		Redacted		
07/24/2018	B. Duffy		1.30	838.50
07/24/2018	B. Duffy		0.30	193.50
07/24/2018	B. Duffy		0.20	129.00
07/24/2018	R. McBride		0.20	108.00
07/24/2018	S. Reich		2.20	660.00
07/24/2018	S. Reich		2.80	840.00
07/24/2018	T. Washburn		0.30	135.00
07/25/2018	B. Duffy		0.70	451.50

07/25/2018	B. Duffy	Redacted	3.90	2,515.50
07/25/2018	T. Washburn		3.40	1,530.00
07/26/2018	B. Duffy		4.30	2,773.50
07/26/2018	T. Washburn		2.80	1,260.00
07/27/2018	B. Duffy		5.50	3,547.50
07/27/2018	T. Washburn		0.60	270.00
07/30/2018	B. Duffy		6.60	4,257.00
07/30/2018	S. Reich		1.30	390.00
07/30/2018	S. Reich		0.20	60.00

		Redacted		
07/30/2018	S. Reich	[redacted]	0.20	60.00
07/30/2018	T. Washburn	[redacted]	10.70	4,815.00
07/31/2018	B. Duffy	[redacted]	0.90	580.50
07/31/2018	B. Duffy	[redacted]	9.90	6,385.50
07/31/2018	T. Washburn	[redacted]	1.20	540.00

		Redacted		
		Task L330 Subtotal	**100.60**	**$53,418.00**
		L350 Discovery Motions		
07/03/2018	R. McBride	Redacted	0.80	432.00
07/10/2018	R. McBride		1.50	810.00
07/10/2018	R. McBride		0.30	162.00
07/12/2018	R. McBride		0.50	270.00
07/15/2018	R. McBride		1.50	810.00
07/16/2018	R. McBride		1.50	810.00
07/16/2018	S. Reich		1.80	540.00
07/16/2018	S. Reich		2.70	810.00

		Redacted		
07/17/2018	R. McBride	[redacted]	0.60	324.00
07/17/2018	S. Reich	[redacted]	0.70	210.00
07/17/2018	S. Reich	[redacted]	3.20	960.00
		Task L350 Subtotal	**15.10**	**$6,138.00**
		Phase L300 Total	**140.00**	**$70,710.50**
		L400 Trial Preparation and Trial		
		L430 Written Motions and Submissions		
		Redacted		
07/06/2018	B. Duffy	[redacted]	0.40	258.00
07/13/2018	B. Duffy	[redacted]	1.60	1,032.00
07/14/2018	B. Duffy	[redacted]	0.70	451.50

07/15/2018	B. Duffy	Redacted	1.80	1,161.00
07/16/2018	B. Duffy		0.90	580.50
07/16/2018	B. Duffy		0.30	193.50
07/16/2018	B. Duffy		0.70	451.50
07/16/2018	B. Duffy		0.50	322.50
07/17/2018	B. Duffy		0.30	193.50
07/17/2018	B. Duffy		6.80	4,386.00

		Redacted		
07/19/2018	B. Duffy		0.80	516.00
07/20/2018	B. Duffy		0.80	516.00
07/21/2018	B. Duffy		0.40	258.00
		Task L430 Subtotal	**16.00**	**$10,320.00**
		Phase L400 Total	**16.00**	**$10,320.00**

OUR FEE $128,179.50

COSTS ADVANCED

E100 Expenses

	Mileage	129.60
	Court Document Charge	2.97
	Lane Powell discovery services	5,046.66
07/19/2018	Travel expense - - B. Duffy, Seattle WA, Uber to airport to fly to Spokane, 06/21/18	44.26
07/19/2018	Travel expense - - B. Duffy, Spokane WA, Uber to airport to fly home from Spokane, 06/23/18	40.66
07/27/2018	Travel expense - - B. Duffy, Olympia WA, Parking while attending 30(b)(6) deposition of WSP, 06/18/18	16.00
07/27/2018	Travel expense - - B. Duffy, Spokane WA, Parking at hotel to take plaintiff's deposition, 06/22/18	22.00
07/27/2018	Travel expense - - B. Duffy, Spokane WA, Rental car to take plaintiff's deposition, 06/22/18	87.77

07/27/2018	Meals while traveling - - B. Duffy, Spokane WA, Meal while traveling to take plaintiff's deposition, 06/22/18	33.09
07/27/2018	Meals while traveling - - B. Duffy, Spokane WA, Meal while traveling to take plaintiff's deposition, 06/22/18	27.93
07/27/2018	Meals while traveling - - B. Duffy, Spokane WA, Meal while traveling to take plaintiff's deposition, 06/22/18	20.95
07/27/2018	Travel expense - - B. Duffy, Olympia WA, Parking while attending 30(b)(6) deposition of WSP, 07/02/18	16.00
07/27/2018	Meals while traveling - - B. Duffy, Olympia WA, While attending 30(b)(6) depositions, 07/02/18	9.20
07/27/2018	Travel expense - - B. Duffy, Spokane WA, Hotel during plaintiff's deposition, 06/22/18	203.78
07/27/2018	Air fare - - B. Duffy, Spokane WA, Flight to attend deposition of plaintiff, 06/21/18 - 06/22/18	516.41
07/27/2018	Meals while traveling - - B. Duffy, Spokane WA, Lunch while taking deposition of plaintiff, 06/18/18	22.07
	Phase Subtotal	$6,239.35

TOTAL COSTS ADVANCED $ 6,239.35

RATE SUMMARY

Attorney/Timekeeper	Hours Worked	Billed Per Hour	Bill Amount
B. Duffy	87.10	645.00	56,179.50
R. McBride	35.60	540.00	19,224.00
D. McCurdy	19.90	310.00	6,169.00
T. Washburn	62.80	450.00	28,260.00
S. Reich	58.60	300.00	17,580.00
B. Schmidt	2.60	295.00	767.00
Total all Timekeepers	266.60		128,179.50

TOTAL THIS INVOICE $134,418.85

EXHIBIT 9

Swapp Matter 131106.000001

Rate Rejections for Invoices dated 4/24/2018-08/08/2018 (work dated 3/1/2018 through 7/31/2018)

invoice numbers 3759351, 3761880, 3764734, 3766921, 3768792

Initials	Timekeeper	Rate	Hours	Billed Fees	Hartford Appr. Rate	Amount Approved	Rate Difference/ Amount Rejected
1882	Barbara J. Duffy	645.00	379.7	244,906.50	645.00	244,906.50	0.00
2772	Ryan McBride	540.00	139.3	75,222.00	540.00	75,222.00	0.00
2976	Kristin Beneski	415.00	183.0	75,945.00	195.00	35,685.00	40,260.00
3138	Taylor Washburn	450.00	89.7	40,365.00	195.00	17,491.50	22,873.50
3214	Devon McCurdy	310.00	185.9	57,629.00	195.00	36,250.50	21,378.50
3226	Aaron Schaer	330.00	8.7	2,871.00	195.00	1,696.50	1,174.50
1314	Barbara Schmidt	295.00	98.3	28,998.50	100.00	9,830.00	19,168.50
1801	Susan L. Reich	300.00	281.9	84,570.00	100.00	28,190.00	56,380.00
3086	LaFay Williams	95.00	1.9	180.50	95.00	180.50	0.00
	TOTAL					**rate reductions**	**161,235.00**

Date	Invoice	Billed Amou	Rejected Amo	Paid Amount	
4/24/2018	3759351	144,289.69	47,562.47	96,622.22	
5/21/2018	3761880	133,336.43	54,348.47	78,987.96	
6/20/2018	3764734	188,308.45	57,976.84	130,331.61	
7/13/2018	3766921	117,745.45	38,962.15	78,783.30	
8/8/2018	3768792	134,418.83	43,100.55	91,318.28	*Percent Paid*
TOTAL		**718,098.85**	**241,950.48**	**476,043.37**	*66.29%*
Rate Reductions			161,235.00		
Rejected Amounts (after rate reduction)			**80,715.48**		

Exhibit B

Block & Leviton LLP - User Summary

Date Start: 1/1/2017 | Date End: 2/21/2020 | Clients: Wash DPPA | Projects: Swapp | Users: | Account Managers: All

Date	Client	Project	Description	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
Colin Downes							
10/01/2018	Wash DPPA	Swapp	Review/analyze issues re class certification.	$425	1.20	1.20	$510.00
10/02/2018	Wash DPPA	Swapp	Draft/revise opposition to motion to dismiss.	$425	2.90	2.90	$1,232.50
10/02/2018	Wash DPPA	Swapp	Review/analyze issues re class certification.	$425	2.50	2.50	$1,062.50
10/02/2018	Wash DPPA	Swapp	Meet with J. Barton re class certification.	$425	0.80	0.80	$340.00
10/03/2018	Wash DPPA	Swapp	Review/analyze Defendant's Reply Memorandum on Motion to Compel Sweetser.	$425	0.40	0.40	$170.00
10/03/2018	Wash DPPA	Swapp	Review/analyze factual issues re SECTOR.	$425	0.50	0.50	$212.50
10/05/2018	Wash DPPA	Swapp	Review/analyze issues re class certification, including review of deposition testimony and analysis of SECTOR source code.	$425	5.90	5.90	$2,507.50
10/16/2018	Wash DPPA	Swapp	Review/analyze issues re class certification.	$425	5.60	5.60	$2,380.00
10/17/2018	Wash DPPA	Swapp	Review/analzye issues re class certification.	$425	3.00	3.00	$1,275.00
10/17/2018	Wash DPPA	Swapp	Draft/revise reply memo re class certification.	$425	3.00	3.00	$1,275.00
10/18/2018	Wash DPPA	Swapp	Draft/revise reply re class certification.	$425	6.30	6.30	$2,677.50
10/19/2018	Wash DPPA	Swapp	Draft/revise reply brief re class certification.	$425	4.20	4.20	$1,785.00
10/21/2018	Wash DPPA	Swapp	Draft/revise reply memorandum re class cert.	$425	4.40	4.40	$1,870.00
10/22/2018	Wash DPPA	Swapp	Draft/revise reply memorandum re class cert.	$425	6.80	6.80	$2,890.00
10/23/2018	Wash DPPA	Swapp	Draft/revise reply memorandum re class cert.	$425	9.20	9.20	$3,910.00
10/25/2018	Wash DPPA	Swapp	Draft/revise reply memorandum re class cert.	$425	3.70	3.70	$1,572.50
10/26/2018	Wash DPPA	Swapp	Draft/revise reply memorandum re class cert.	$425	4.50	4.50	$1,912.50
10/28/2018	Wash DPPA	Swapp	Review/analyze issues re damages on class certification briefing.	$425	2.00	2.00	$850.00
10/28/2018	Wash DPPA	Swapp	Draft/revise class certificaiton reply memorandum.	$425	5.50	5.50	$2,337.50
10/28/2018	Wash DPPA	Swapp	Email correspondence with J. Barton.	$425	0.40	0.40	$170.00
10/29/2018	Wash DPPA	Swapp	Meeting with RJB re class certification issues.	$425	0.50	0.50	$212.50
10/29/2018	Wash DPPA	Swapp	Draft/revise motion for extension of deadline re class certification reply.	$425	1.50	1.50	$637.50
10/29/2018	Wash DPPA	Swapp	Email correspondence with opposing counsel and local counsel re motion for extension of deadline re class certification reply.	$425	0.50	0.50	$212.50
10/30/2018	Wash DPPA	Swapp	Review/analyze issues re substitution of named plaintiff and Department of Licensing records and procedures.	$425	2.80	2.80	$1,190.00
10/30/2018	Wash DPPA	Swapp	Draft/revise reply re class certification, declaration, and exhibits.	$425	1.20	1.20	$510.00
10/30/2018	Wash DPPA	Swapp	Review/analyze briefing in related case re implications for motion to dismiss briefing.	$425	0.90	0.90	$382.50
10/31/2018	Wash DPPA	Swapp	Draft/revise reply memorandum re class certification.	$425	3.20	3.20	$1,360.00

11/06/2018	Wash DPPA Swapp	Review/analyze issues re redacted materials produced by Swapp.	$425	1.20	1.20	$510.00
11/13/2018	Wash DPPA Swapp	Review/analyze Swapp productions for fact research and consideration of propriety of redactions.	$425	5.50	5.50	$2,337.50
11/14/2018	Wash DPPA Swapp	Email correspondence with J. Barton re redactions of discovery.	$425	0.70	0.70	$297.50
01/28/2019	Wash DPPA Swapp	Review/analyze class certification opinion.	$450	0.60	0.60	$270.00
01/28/2019	Wash DPPA Swapp	Review/analyze issues re class notice.	$450	2.00	2.00	$900.00
01/28/2019	Wash DPPA Swapp	Draft/revise class notice.	$450	1.20	1.20	$540.00
02/04/2019	Wash DPPA Swapp	Draft/revise joint status report.	$450	2.30	2.30	$1,035.00
02/05/2019	Wash DPPA Swapp	Draft/revise RFP re claims notice administration.	$450	2.50	2.50	$1,125.00
02/07/2019	Wash DPPA Swapp	Draft/revise RFP re claim notice.	$450	0.80	0.80	$360.00
02/08/2019	Wash DPPA Swapp	Draft/revise status report	$450	2.50	2.50	$1,125.00
02/08/2019	Wash DPPA Swapp	Email correspondence with claim notice service providers.	$450	0.50	0.50	$225.00
02/14/2019	Wash DPPA Swapp	Draft/revise class notice RFP.	$450	2.50	2.50	$1,125.00
02/15/2019	Wash DPPA Swapp	Draft/revise class notice RFP.	$450	1.10	1.10	$495.00
02/20/2019	Wash DPPA Swapp	Telephone call with T. Jarrard, J. Sweetser, M. Sweetser, RJB re case status and next steps.	$450	1.00	1.00	$450.00
04/08/2019	Wash DPPA Swapp	Review/analyze documents produced for mediation.	$450	1.50	1.50	$675.00
04/09/2019	Wash DPPA Swapp	Review/analyze documents produced for mediation.	$450	1.50	1.50	$675.00
05/06/2019	Wash DPPA Swapp	Draft/revise confidential settlement letter.	$450	3.50	3.50	$1,575.00
05/07/2019	Wash DPPA Swapp	Draft/revise confidential settlement letter.	$450	1.50	1.50	$675.00
05/17/2019	Wash DPPA Swapp	Review/analyze Defendant financial statements.	$450	0.80	0.80	$360.00
06/06/2019	Wash DPPA Swapp	Draft/revise Settlement Agreement.	$450	2.20	2.20	$990.00
06/12/2019	Wash DPPA Swapp	Draft/revise settlement agreement.	$450	2.80	2.80	$1,260.00
06/13/2019	Wash DPPA Swapp	Draft/revise settlement agreement.	$450	3.70	3.70	$1,665.00
06/28/2019	Wash DPPA Swapp	Draft/revise Settlement Agreement.	$450	3.80	3.80	$1,710.00
07/30/2019	Wash DPPA Swapp	Draft/revise Settlement Agreement.	$450	4.80	4.80	$2,160.00
07/30/2019	Wash DPPA Swapp	Review/analyze transcript of mediation hearing.	$450	0.50	0.50	$225.00
07/31/2019	Wash DPPA Swapp	Draft/revise Settlement Agreement.	$450	1.60	1.60	$720.00
08/20/2019	Wash DPPA Swapp	Draft/revise RFP re settlement administration services.	$450	1.50	1.50	$675.00
08/20/2019	Wash DPPA Swapp	Review/analyze issues re Class Notice.	$450	0.80	0.80	$360.00
08/21/2019	Wash DPPA Swapp	Email correspondence and phone calls with potential settlement administration service providers re RFP for settlement administration services.	$450	1.40	1.40	$630.00
08/22/2019	Wash DPPA Swapp	Draft/revise class notice.	$450	4.20	4.20	$1,890.00
08/26/2019	Wash DPPA Swapp	Review/analyze issues re Settlement Agreement.	$450	0.70	0.70	$315.00
08/26/2019	Wash DPPA Swapp	Email correspondence with potential class administration service providers.	$450	0.50	0.50	$225.00
08/30/2019	Wash DPPA Swapp	Draft/revise Class notice	$450	2.10	2.10	$945.00
08/30/2019	Wash DPPA Swapp	Review/analyze RFP responses from settlement administrator vendors.	$450	1.50	1.50	$675.00
09/18/2019	Wash DPPA Swapp	Email correspondence with settlement administrators re RFP.	$450	0.80	0.80	$360.00
09/18/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion.	$450	2.20	2.20	$990.00
09/19/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion.	$450	4.50	4.50	$2,025.00

09/19/2019	Wash DPPA Swapp	Review/analyze issues re E.D. Wash precedents relating to class certification approval.	$450	1.80	1.80	$810.00
09/20/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion.	$450	2.20	2.20	$990.00
09/23/2019	Wash DPPA Swapp	Review/analyze issues re class data and email correspondence with M. Sweetser and T. Jarrard re same.	$450	0.80	0.80	$360.00
09/23/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion.	$450	2.50	2.50	$1,125.00
09/24/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion.	$450	1.60	1.60	$720.00
09/25/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion.	$450	1.50	1.50	$675.00
09/30/2019	Wash DPPA Swapp	Review/analyze class data	$450	2.00	2.00	$900.00
10/01/2019	Wash DPPA Swapp	Telephone calls with settlement administration RFP respondents re proposal assumptions.	$450	1.50	1.50	$675.00
10/02/2019	Wash DPPA Swapp	Draft/revise Plan of Allocation, Second Settlement Certificate, Settlement Agreement.	$450	3.10	3.10	$1,395.00
10/02/2019	Wash DPPA Swapp	Review/analyze settlement administrator RFP responses.	$450	0.50	0.50	$225.00
10/03/2019	Wash DPPA Swapp	Draft 2d Settlement Certificate.	$450	0.90	0.90	$405.00
10/07/2019	Wash DPPA Swapp	Draft/revise settlement agreement.	$450	2.20	2.20	$990.00
10/10/2019	Wash DPPA Swapp	Draft/revise motion for preliminary approval.	$450	3.50	3.50	$1,575.00
10/11/2019	Wash DPPA Swapp	Telephone call with RJB re plan of allocation.	$450	0.30	0.30	$135.00
10/14/2019	Wash DPPA Swapp	Review/analyze class data.	$450	0.80	0.80	$360.00
10/14/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion.	$450	2.20	2.20	$990.00
10/15/2019	Wash DPPA Swapp	Draft/revise 3rd Settlement Certificate.	$450	0.80	0.80	$360.00
10/15/2019	Wash DPPA Swapp	Review/analyze bids for settlement administration services.	$450	2.50	2.50	$1,125.00
10/15/2019	Wash DPPA Swapp	Draft/revise proposed order re preliminary approval and Barton Declaration re preliminary approval.	$450	3.30	3.30	$1,485.00
10/15/2019	Wash DPPA Swapp	Email correspondence and telephone calls with settlement administration RFP bid respondents.	$450	1.10	1.10	$495.00
10/16/2019	Wash DPPA Swapp	Draft/revise plan of allocation.	$450	0.50	0.50	$225.00
10/16/2019	Wash DPPA Swapp	Email correspondence and phone calls with opposing counsel re settlement certificate.	$450	0.80	0.80	$360.00
10/17/2019	Wash DPPA Swapp	Review/analyze revised bids re settlement administration services.	$450	1.20	1.20	$540.00
10/23/2019	Wash DPPA Swapp	Review/analyze issues re settlement administrator appointment and email communication with RG/2 and Angeion re same.	$450	0.60	0.60	$270.00
10/23/2019	Wash DPPA Swapp	Review/analyze issues re local rules and preliminary approval hearing date.	$450	0.40	0.40	$180.00
10/24/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion, Downes Declaration, Barton Declaration, and proposed order.	$450	2.60	2.60	$1,170.00
10/24/2019	Wash DPPA Swapp	Email correspondence with opposing counsel re finalizing settlement agreement.	$450	0.40	0.40	$180.00
10/24/2019	Wash DPPA Swapp	Email correspondence and telephone calls with settlement administrators re finalizing bids for court.	$450	0.60	0.60	$270.00
10/25/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion and ancillary documents.	$450	1.80	1.80	$810.00
10/25/2019	Wash DPPA Swapp	Manage data/files re preliminary approval filing.	$450	0.40	0.40	$180.00

10/25/2019	Wash DPPA Swapp	Telephone call with M. Siegel re issues related to filing of motion for preliminary approval.	$450	0.30	0.30	$135.00
10/28/2019	Wash DPPA Swapp	Review/analyze issues re wire instructions and settlement agreement.	$450	0.60	0.60	$270.00
10/29/2019	Wash DPPA Swapp	Email correspondence with settlement administration RFP respondents.	$450	0.30	0.30	$135.00
10/31/2019	Wash DPPA Swapp	Review/analyze issues re Sirius XM DPPA case.	$450	0.50	0.50	$225.00
12/03/2019	Wash DPPA Swapp	Review/analyze class data and email correspondence with opposing counsel re same.	$450	1.50	1.50	$675.00
12/10/2019	Wash DPPA Swapp	Call with settlement administrator re notice issues.	$450	0.50	0.50	$225.00
12/19/2019	Wash DPPA Swapp	Review/analyze issues re class notice and website.	$450	0.80	0.80	$360.00
12/23/2019	Wash DPPA Swapp	Review/analyze issues re fee estimate and email correspondence with RJB and J. Sweetser re same.	$450	1.20	1.20	$540.00
12/23/2019	Wash DPPA Swapp	Call Angeion Group re Class Notice.	$450	0.40	0.40	$180.00
12/26/2019	Wash DPPA Swapp	Email correspondence with J. Sweetser re attorneys fees.	$450	0.40	0.40	$180.00
12/26/2019	Wash DPPA Swapp	Review/analyze issues re calculation of attorneys fees.	$450	1.60	1.60	$720.00
12/26/2019	Wash DPPA Swapp	Review/analyze issues re attorneys fees estimate and email correspondence with RJB re same.	$450	0.50	0.50	$225.00
01/03/2020	Wash DPPA Swapp	Email correspondence and phone calls with Angeion re scope of settlement administration services.	$475	0.60	0.60	$285.00
01/03/2020	Wash DPPA Swapp	Draft/revise direction letter and email correspondence with opposing counsel re same.	$475	0.50	0.50	$237.50
		Total Labor For Colin Downes		**210.30**	**210.30**	**$92,392.50**

Jason Leviton

08/09/2017	Wash DPPA Swapp	Factual Research; Review/Edit Complaint; Meeting with J. Barton RE Complaint.	$725	1.80	1.80	$1,305.00
08/25/2017	Wash DPPA Swapp	Research and Edit Pro Hac Motion	$725	1.20	1.20	$870.00
10/23/2017	Wash DPPA Swapp	Review/Analyze Defendants' Motion to Dismiss.	$725	0.80	0.80	$580.00
11/15/2017	Wash DPPA Swapp	Emails and Call with Barton RE MTD Hearing	$725	0.30	0.30	$217.50
12/18/2017	Wash DPPA Swapp	Review MTD Briefing.	$725	1.80	1.80	$1,305.00
12/27/2017	Wash DPPA Swapp	Review Order Denying MTD	$725	0.40	0.40	$290.00
02/16/2018	Wash DPPA Swapp	Mediator Research.	$765	0.30	0.30	$229.50
01/24/2019	Wash DPPA Swapp	Review Order on MTD	$825	0.30	0.30	$247.50
01/25/2019	Wash DPPA Swapp	Review Class Cert Decision.	$825	0.40	0.40	$330.00
02/01/2019	Wash DPPA Swapp	Claims Admin Research; Call with Ming	$825	0.30	0.30	$247.50
02/12/2019	Wash DPPA Swapp	Call with Barton; Review Settlement Filing.	$825	0.30	0.30	$247.50
		Total Labor For Jason Leviton		**7.90**	**7.90**	**$5,869.50**

Joe Barton

06/09/2017	Wash DPPA Swapp	review complaint and TRO in Batiste case	$710	0.50	0.50	$355.00
07/11/2017	Wash DPPA Swapp	correspondence with T. Kirchofer and T. Jarrard re: complaint	$710	0.10	0.10	$71.00
07/20/2017	Wash DPPA Swapp	review of N.D. Indiana decision & corresp w/ Ps counsel re: same	$710	0.40	0.40	$284.00
07/31/2017	Wash DPPA Swapp	review complaint and background info	$710	1.80	1.80	$1,278.00
08/03/2017	Wash DPPA Swapp	edit complaint	$710	0.90	0.90	$639.00
08/03/2017	Wash DPPA Swapp	edit complaint	$710	3.00	3.00	$2,130.00
08/04/2017	Wash DPPA Swapp	Edit complaint	$710	11.40	11.40	$8,094.00
08/05/2017	Wash DPPA Swapp	correspondence with. T. Jarrard and T. Kirchafer re: class definition in complaint	$710	0.10	0.10	$71.00
08/06/2017	Wash DPPA Swapp	correspondence with M. Sweetser re : Washington Bar complaint	$710	0.20	0.20	$142.00
08/06/2017	Wash DPPA Swapp	review/edit complaint	$710	0.60	0.60	$426.00
08/07/2017	Wash DPPA Swapp	correspondence with Plaintiff's council re: class deposition	$710	0.50	0.50	$355.00
08/07/2017	Wash DPPA Swapp	review email from and correspondence with T. Kirchofer re: edits to complaint	$710	0.40	0.40	$284.00
08/07/2017	Wash DPPA Swapp	correspondence with J. Sweetser re: class definition	$710	0.20	0.20	$142.00
08/09/2017	Wash DPPA Swapp	edit class deinition	$710	1.30	1.30	$923.00
08/09/2017	Wash DPPA Swapp	review edits to complaint from J. Leviton and further edits thereto	$710	0.50	0.50	$355.00
08/11/2017	Wash DPPA Swapp	review letters / emails re: State ? & correspondence with co-counsel re: same	$710	0.40	0.40	$284.00
08/15/2017	Wash DPPA Swapp	correspondence with Plts counsel re: service of complaint	$710	0.80	0.80	$568.00
08/15/2017	Wash DPPA Swapp	review Swapp letters to Wash State Bar	$710	0.50	0.50	$355.00
08/24/2017	Wash DPPA Swapp	review and edit pro hac vice motion	$710	0.40	0.40	$284.00
09/26/2017	Wash DPPA Swapp	edit webpage	$710	0.50	0.50	$355.00
10/19/2017	Wash DPPA Swapp	correspondence with R. McBride re: scheduling	$710	0.30	0.30	$213.00
10/20/2017	Wash DPPA Swapp	review defendants MTD	$710	0.80	0.80	$568.00
10/20/2017	Wash DPPA Swapp	call with T. Kirchofer re: MTD	$710	0.30	0.30	$213.00
10/20/2017	Wash DPPA Swapp	call with T. Jarrard re: MTD	$710	0.60	0.60	$426.00
10/23/2017	Wash DPPA Swapp	review defendants MTD attachments	$710	0.30	0.30	$213.00
10/23/2017	Wash DPPA Swapp	call with Plts counsel re: MTD	$710	0.50	0.50	$355.00
10/23/2017	Wash DPPA Swapp	review declarations from Wilcox v. Batiste for MTD	$710	1.00	1.00	$710.00
10/31/2017	Wash DPPA Swapp	review draft app to MTD	$710	1.00	1.00	$710.00
11/02/2017	Wash DPPA Swapp	review draft opp MTD	$710	1.00	1.00	$710.00
11/03/2017	Wash DPPA Swapp	review draft opposition to MTD	$710	1.30	1.30	$923.00
11/03/2017	Wash DPPA Swapp	call with T. Kirchofer re: opposition to MTD	$710	0.80	0.80	$568.00
11/07/2017	Wash DPPA Swapp	review opp to MTD	$710	3.60	3.60	$2,556.00
11/08/2017	Wash DPPA Swapp	edit opp to MTD	$710	1.00	1.00	$710.00
11/08/2017	Wash DPPA Swapp	edit opp to MTD	$710	0.50	0.50	$355.00
11/08/2017	Wash DPPA Swapp	edit opp to MTD	$710	1.60	1.60	$1,136.00
11/08/2017	Wash DPPA Swapp	edit opp to MTD	$710	0.80	0.80	$568.00
11/08/2017	Wash DPPA Swapp	edit opp to MTD	$710	4.50	4.50	$3,195.00
11/09/2017	Wash DPPA Swapp	review opp to Judicial Notice	$710	0.40	0.40	$284.00
11/09/2017	Wash DPPA Swapp	correspondence with T. Kirchofer re: opp to Judicial Notice	$710	0.50	0.50	$355.00

11/09/2017	Wash DPPA Swapp	edit opp to MTD	$710	2.00	2.00	$1,420.00
11/09/2017	Wash DPPA Swapp	edit opp to MTD	$710	2.00	2.00	$1,420.00
11/09/2017	Wash DPPA Swapp	edit opp to MTD	$710	3.30	3.30	$2,343.00
11/10/2017	Wash DPPA Swapp	edit opp to MTD	$710	2.50	2.50	$1,775.00
11/10/2017	Wash DPPA Swapp	edit opp to MTD	$710	0.50	0.50	$355.00
11/10/2017	Wash DPPA Swapp	edit opp to MTD	$710	2.00	2.00	$1,420.00
11/12/2017	Wash DPPA Swapp	edit / review opp to MTD	$710	2.80	2.80	$1,988.00
11/12/2017	Wash DPPA Swapp	edit/ review opposition to request for judicial notice	$710	3.50	3.50	$2,485.00
11/12/2017	Wash DPPA Swapp	edit/ review opposition to request for judicial notice	$710	1.00	1.00	$710.00
11/13/2017	Wash DPPA Swapp	correspondence with Plts counsel re: opposition to MTD	$710	0.20	0.20	$142.00
11/13/2017	Wash DPPA Swapp	review/ edit opposition to MTD	$710	0.70	0.70	$497.00
11/13/2017	Wash DPPA Swapp	review/ approve final opposition to MTD	$710	0.40	0.40	$284.00
11/15/2017	Wash DPPA Swapp	correspondence with J. Leviton re: oral argument on MTD	$710	0.10	0.10	$71.00
11/27/2017	Wash DPPA Swapp	review defendants reply on MTD	$710	0.50	0.50	$355.00
12/04/2017	Wash DPPA Swapp	review defendants cases cited in reply on MTD	$710	0.50	0.50	$355.00
12/12/2017	Wash DPPA Swapp	prep for hearing on MTD	$710	0.40	0.40	$284.00
12/17/2017	Wash DPPA Swapp	prep for oral agreement on MTD	$710	2.00	2.00	$1,420.00
12/17/2017	Wash DPPA Swapp	prep for oral agreement on MTD	$710	0.80	0.80	$568.00
12/18/2017	Wash DPPA Swapp	prep for oral agreement on MTD	$710	0.50	0.50	$355.00
12/18/2017	Wash DPPA Swapp	prep for oral agreement on mTD	$710	0.80	0.80	$568.00
12/18/2017	Wash DPPA Swapp	prep for oral agreement on MTD	$710	1.00	1.00	$710.00
12/19/2017	Wash DPPA Swapp	prep for oral agreement on MTD	$710	2.80	2.80	$1,988.00
12/19/2017	Wash DPPA Swapp	prep for oral agreement on MTD	$710	1.70	1.70	$1,207.00
12/19/2017	Wash DPPA Swapp	prep for oral agreement on MTD	$710	5.00	5.00	$3,550.00
12/20/2017	Wash DPPA Swapp	prep for oral agreement on MTD	$710	1.50	1.50	$1,065.00
12/20/2017	Wash DPPA Swapp	hearing on MTD	$710	0.50	0.50	$355.00
12/22/2017	Wash DPPA Swapp	review order denying MTD	$710	0.40	0.40	$284.00
01/04/2018	Wash DPPA Swapp	review answer to complaint	$750	0.50	0.50	$375.00
01/07/2018	Wash DPPA Swapp	review order re: scheduling conference	$750	0.10	0.10	$75.00
01/15/2018	Wash DPPA Swapp	review/ edit JSR/ Rule 26(f) resp	$750	1.00	1.00	$750.00
01/15/2018	Wash DPPA Swapp	edit letter re: motion to strike defenses	$750	0.70	0.70	$525.00
01/16/2018	Wash DPPA Swapp	correspondence with T. Jarrard and T. Kirchofer re: letter re: affirmative defenses	$750	0.20	0.20	$150.00
01/18/2018	Wash DPPA Swapp	edit plts 1st set of RFPs	$750	1.40	1.40	$1,050.00
01/18/2018	Wash DPPA Swapp	review/ edit Joint Status / Rule 26(f) Report	$750	0.50	0.50	$375.00
01/18/2018	Wash DPPA Swapp	correspondence with defendants re: Joint Status Report	$750	0.20	0.20	$150.00
01/18/2018	Wash DPPA Swapp	edit plts 1st set of RFPs	$750	1.50	1.50	$1,125.00
01/19/2018	Wash DPPA Swapp	edit Pls first set of RFPs	$750	0.30	0.30	$225.00
01/19/2018	Wash DPPA Swapp	call with T. Kirchofer re: plts 1st RFPs	$750	0.50	0.50	$375.00
01/19/2018	Wash DPPA Swapp	review order denying motion to ? in Batiste	$750	0.50	0.50	$375.00
01/22/2018	Wash DPPA Swapp	correspondence with defendants re: scheduling trial date	$750	0.20	0.20	$150.00

01/22/2018	Wash DPPA Swapp	edit stipulation re: Rule 12(f)	$750	0.40	0.40	$300.00
01/22/2018	Wash DPPA Swapp	Rule 26(f) conference with defendants	$750	0.50	0.50	$375.00
01/22/2018	Wash DPPA Swapp	call wtih T. Jarrard re: Rule 26(f) conference	$750	0.50	0.50	$375.00
01/23/2018	Wash DPPA Swapp	edit plts 1st set of RFAs	$750	1.00	1.00	$750.00
01/23/2018	Wash DPPA Swapp	call with T. Kirchofer re: 1st RFAs	$750	0.20	0.20	$150.00
01/26/2018	Wash DPPA Swapp	edit JSR/ Rule 26 (f) report	$750	0.60	0.60	$450.00
01/29/2018	Wash DPPA Swapp	edit Rule 26 (f) report, review defendants' edits and correspondence with T. Jarrard re: same	$750	0.70	0.70	$525.00
01/29/2018	Wash DPPA Swapp	correspondence with defendants counsel re: Rule 26(f) report	$750	0.20	0.20	$150.00
01/31/2018	Wash DPPA Swapp	review. edit plaintiffs 1st RFPs	$750	0.40	0.40	$300.00
01/31/2018	Wash DPPA Swapp	review/ comment on defendants edits to Rule 26(f) report	$750	0.50	0.50	$375.00
01/31/2018	Wash DPPA Swapp	review Rule 26(a) initial disclosure	$750	0.30	0.30	$225.00
02/02/2018	Wash DPPA Swapp	review ? Rule 26(a) disclosure	$750	0.10	0.10	$75.00
02/02/2018	Wash DPPA Swapp	call with T. Kirchofer re: 1st set of interrogs	$750	0.60	0.60	$450.00
02/02/2018	Wash DPPA Swapp	edit Rule 26(b) motion to strike affirmative defenses	$750	0.80	0.80	$600.00
02/05/2018	Wash DPPA Swapp	review defendants Rule 26(A) disclosures	$750	0.40	0.40	$300.00
02/05/2018	Wash DPPA Swapp	correspondence with defendants counsel re: protective order	$750	0.30	0.30	$225.00
02/06/2018	Wash DPPA Swapp	edit plts 1st of interrogs	$750	1.00	1.00	$750.00
02/06/2018	Wash DPPA Swapp	call with T. Kirchofer re: discovery and protective order	$750	0.40	0.40	$300.00
02/06/2018	Wash DPPA Swapp	edit plts 1st set of interrogs	$750	1.40	1.40	$1,050.00
02/09/2018	Wash DPPA Swapp	review Plts 1st set of interrogs	$750	0.30	0.30	$225.00
02/09/2018	Wash DPPA Swapp	review insurance policy docs	$750	1.00	1.00	$750.00
02/10/2018	Wash DPPA Swapp	review analysis of insurance coverage	$750	0.30	0.30	$225.00
02/12/2018	Wash DPPA Swapp	edit Rule 12(f) motion to strike	$750	2.30	2.30	$1,725.00
02/12/2018	Wash DPPA Swapp	edit 1st set of Interrogatories	$750	0.90	0.90	$675.00
02/12/2018	Wash DPPA Swapp	edit stipulated protective order	$750	0.50	0.50	$375.00
02/12/2018	Wash DPPA Swapp	call with T. Jarrard re discovery	$750	0.40	0.40	$300.00
02/12/2018	Wash DPPA Swapp	review 1st set of interrogs	$750	0.30	0.30	$225.00
02/12/2018	Wash DPPA Swapp	correspondence re: oral argument with T. Jarrard	$750	0.10	0.10	$75.00
02/13/2018	Wash DPPA Swapp	review final review of motion to strike	$750	0.30	0.30	$225.00
02/14/2018	Wash DPPA Swapp	prep for Rule 16 conference	$750	0.50	0.50	$375.00
02/14/2018	Wash DPPA Swapp	call with T. Jarrard and T. Kirchofer re: Rule 16 conference	$750	0.20	0.20	$150.00
02/14/2018	Wash DPPA Swapp	Rule 16 conference	$750	0.50	0.50	$375.00
02/14/2018	Wash DPPA Swapp	call with T. Jarrard re: Rule 16 conference	$750	0.20	0.20	$150.00
02/14/2018	Wash DPPA Swapp	call with T. Kirchofer re: protective order	$750	0.10	0.10	$75.00
02/23/2018	Wash DPPA Swapp	correspondence with B. Duffy re: request for extension on discovery	$750	0.50	0.50	$375.00
02/27/2018	Wash DPPA Swapp	correspondence with T. Jarrard re: discovery extension and protective order	$750	0.10	0.10	$75.00
02/27/2018	Wash DPPA Swapp	review defendants edits to protective order	$750	0.30	0.30	$225.00
02/27/2018	Wash DPPA Swapp	review memo re: interview with ex-Swapp employee Britt	$750	0.30	0.30	$225.00
02/27/2018	Wash DPPA Swapp	review defendants resp to motion to strike	$750	0.30	0.30	$225.00

02/27/2018	Wash DPPA Swapp	call with T. Jarrard re: discovery	$750	0.30	0.30	$225.00
03/01/2018	Wash DPPA Swapp	review of protective order - defendants edits and T. Jarrard edits	$750	0.40	0.40	$300.00
03/02/2018	Wash DPPA Swapp	edit protective order	$750	0.50	0.50	$375.00
03/02/2018	Wash DPPA Swapp	correspondence with B. Duffy re: extension on discovery	$750	0.20	0.20	$150.00
03/02/2018	Wash DPPA Swapp	edit protective order and correspondence with defendants re: same	$750	0.30	0.30	$225.00
03/05/2018	Wash DPPA Swapp	review/edit reply brief on motion to strike	$750	0.50	0.50	$375.00
03/05/2018	Wash DPPA Swapp	edit reply on motion to strike	$750	2.40	2.40	$1,800.00
03/06/2018	Wash DPPA Swapp	edit reply on motion to strike defendants defenses	$750	1.90	1.90	$1,425.00
03/06/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: motion to strike defendant's defenses	$750	0.10	0.10	$75.00
03/06/2018	Wash DPPA Swapp	edit motion to strike defendant's defenses	$750	1.20	1.20	$900.00
03/07/2018	Wash DPPA Swapp	review defendants resp to 1st RFAs and 1st RFPs	$750	9.90	9.90	$7,425.00
03/07/2018	Wash DPPA Swapp	correspondence with B. Duffy re: discovery and custodians and search terms	$750	1.00	1.00	$750.00
03/07/2018	Wash DPPA Swapp	review Plts 2nd RFA	$750	0.30	0.30	$225.00
03/07/2018	Wash DPPA Swapp	edit letter to defendants re: Rule 26(a) disclosures	$750	0.80	0.80	$600.00
03/09/2018	Wash DPPA Swapp	review defendants letter re: search terms	$750	0.30	0.30	$225.00
03/09/2018	Wash DPPA Swapp	call with T. Jarrard re: discovery and search terms	$750	0.20	0.20	$150.00
03/09/2018	Wash DPPA Swapp	correspondence with B. Duffy re: confidentiality of docs	$750	0.30	0.30	$225.00
03/09/2018	Wash DPPA Swapp	review defendants 1st RFPs and interrogs	$750	0.80	0.80	$600.00
03/09/2018	Wash DPPA Swapp	call with T. Jarrard and T. Kirchofer re: defendants discovery and protective order	$750	1.40	1.40	$1,050.00
03/09/2018	Wash DPPA Swapp	review defendants edits to protective order and edit same	$750	1.00	1.00	$750.00
03/12/2018	Wash DPPA Swapp	review search terms	$750	0.50	0.50	$375.00
03/12/2018	Wash DPPA Swapp	call with T. Kirchofer and T. Jarrard re: search terms	$750	0.50	0.50	$375.00
03/12/2018	Wash DPPA Swapp	call with defendants re: search terms	$750	0.50	0.50	$375.00
03/13/2018	Wash DPPA Swapp	review/edit email re: search terms for defendants discovery	$750	1.30	1.30	$975.00
03/13/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: defendants position re: privilege of clients names	$750	0.10	0.10	$75.00
03/13/2018	Wash DPPA Swapp	review of search terms and correspondence with T. Kirchofer re: same	$750	0.30	0.30	$225.00
03/13/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: discovery of client names	$750	0.10	0.10	$75.00
03/13/2018	Wash DPPA Swapp	review plts Rule 26(A) disclosure documents	$750	1.00	1.00	$750.00
03/13/2018	Wash DPPA Swapp	review of Plt rule 26(a) documents to produce	$750	0.80	0.80	$600.00
03/14/2018	Wash DPPA Swapp	review defendants letter re: search terms	$750	0.10	0.10	$75.00
03/14/2018	Wash DPPA Swapp	call with T. Kirchofer re: search fees and discovery	$750	0.50	0.50	$375.00
03/14/2018	Wash DPPA Swapp	review defendants changes to protective order	$750	0.30	0.30	$225.00
03/14/2018	Wash DPPA Swapp	review proposed order re: class and correspondence with T. Jarrard re: same	$750	0.40	0.40	$300.00
03/15/2018	Wash DPPA Swapp	correspondence with B. Duffy re: class certification	$750	0.40	0.40	$300.00
03/15/2018	Wash DPPA Swapp	review defendants proposed search terms	$750	0.50	0.50	$375.00
03/15/2018	Wash DPPA Swapp	review defendants resp to Plts 1st Interrogs	$750	0.50	0.50	$375.00
03/15/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: defendants resp to 1st set of interrogs	$750	0.20	0.20	$150.00
03/15/2018	Wash DPPA Swapp	correspondence with defendants re: class certification page limit	$750	0.20	0.20	$150.00
03/15/2018	Wash DPPA Swapp	review defendants winning letter re: class certification schedule	$750	0.20	0.20	$150.00

03/15/2018	Wash DPPA Swapp	correspondence with defendants re: class certification deadlines	$750	0.80	0.80	$600.00
03/16/2018	Wash DPPA Swapp	review defendants search term results	$750	0.30	0.30	$225.00
03/19/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: defendants production	$750	0.10	0.10	$75.00
03/20/2018	Wash DPPA Swapp	review defendants edit to proposed protective order and motion	$750	0.20	0.20	$150.00
03/21/2018	Wash DPPA Swapp	review emails from and to defendants re: discovery	$750	1.00	1.00	$750.00
03/22/2018	Wash DPPA Swapp	correspondence with T. Jarrard and J. Sweetser re: status	$750	0.10	0.10	$75.00
03/22/2018	Wash DPPA Swapp	review draft letter to defendants counsel re: resp to Interrogs and call with T. Kirchofer re: same	$750	0.30	0.30	$225.00
03/23/2018	Wash DPPA Swapp	review correspondence from M. Siegel re: discovery and production and respond thereto	$750	0.20	0.20	$150.00
03/23/2018	Wash DPPA Swapp	call with T. Kirchofer re: discovery and search terms	$750	0.50	0.50	$375.00
03/23/2018	Wash DPPA Swapp	correspondence with Plts counsel re: strategies	$750	0.10	0.10	$75.00
03/23/2018	Wash DPPA Swapp	edit letter to defendants re: defendants interogs and RFPs	$750	1.10	1.10	$825.00
03/26/2018	Wash DPPA Swapp	review revised search terms	$750	0.20	0.20	$150.00
03/26/2018	Wash DPPA Swapp	call with T. Kirchofer re: defendants resp to interrogs and RFPs	$750	0.40	0.40	$300.00
03/26/2018	Wash DPPA Swapp	edit letter to defendants re: discovery	$750	0.30	0.30	$225.00
03/26/2018	Wash DPPA Swapp	review summary of call with defendants re: search term	$750	0.20	0.20	$150.00
03/28/2018	Wash DPPA Swapp	edit Plts resp to defendants interrogs	$750	1.10	1.10	$825.00
03/28/2018	Wash DPPA Swapp	review defendants response to defendants 1st RFPs	$750	0.20	0.20	$150.00
03/28/2018	Wash DPPA Swapp	review revised defendants response to defendants interrogatories and call with T. Kirchofer re: same	$750	0.30	0.30	$225.00
04/02/2018	Wash DPPA Swapp	review defendants letter response to plts letter re: defendants resp to 1st set of interrogs, RFPs, initial disclosures and response	$750	0.70	0.70	$525.00
04/04/2018	Wash DPPA Swapp	edit Plts resp to defendants 1st set of interrogs	$750	0.50	0.50	$375.00
04/05/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: Swapp production	$750	0.20	0.20	$150.00
04/06/2018	Wash DPPA Swapp	review/ edit Plts resp to defendants 1st RFPs	$750	2.00	2.00	$1,500.00
04/06/2018	Wash DPPA Swapp	review/ edit defendants response to defendants 1st RFPs	$750	0.50	0.50	$375.00
04/06/2018	Wash DPPA Swapp	call with defendants re: meet and confer on defendants resp to 1st interrogs, 1st RFP and initial disclosure	$750	0.70	0.70	$525.00
04/07/2018	Wash DPPA Swapp	review Plts resp to 1st set of defendants	$750	0.20	0.20	$150.00
04/07/2018	Wash DPPA Swapp	review defendants response to Plts 2nd set of RFAs	$750	0.20	0.20	$150.00
04/11/2018	Wash DPPA Swapp	review memo re: T. Kirchofer conversation with ex-employee K. Britt and correspondence with re: same	$750	0.40	0.40	$300.00
04/13/2018	Wash DPPA Swapp	review defendants letter	$750	0.30	0.30	$225.00
04/18/2018	Wash DPPA Swapp	call with defendants re: meet and confer re defendants interrogatories and RFPs	$750	1.10	1.10	$825.00
04/18/2018	Wash DPPA Swapp	call with T. Jarrad re: settlement	$750	0.50	0.50	$375.00
04/23/2018	Wash DPPA Swapp	call with defendants counsel re: meet and confer with defendants	$750	0.80	0.80	$600.00
04/23/2018	Wash DPPA Swapp	prep for call with defendants call with defendants re: discovery	$750	0.80	0.80	$600.00
04/23/2018	Wash DPPA Swapp	call with defendants re: discovery	$750	1.00	1.00	$750.00

04/24/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: mediation	$750	0.10	0.10	$75.00
04/24/2018	Wash DPPA Swapp	call with T. Kirchofer re: discovery	$750	0.30	0.30	$225.00
04/24/2018	Wash DPPA Swapp	review materials re: std accident reports	$750	0.40	0.40	$300.00
04/24/2018	Wash DPPA Swapp	call with M. Sweester and T. Kirchofer re: discovery	$750	0.40	0.40	$300.00
04/26/2018	Wash DPPA Swapp	review proposed discovery	$750	0.50	0.50	$375.00
04/27/2018	Wash DPPA Swapp	review order on motion to strike defendants affirmative defenses	$750	0.40	0.40	$300.00
04/27/2018	Wash DPPA Swapp	call with T. Kirchofer re: letter to B. Duffy	$750	0.60	0.60	$450.00
04/30/2018	Wash DPPA Swapp	edit letter to defendants re: plts discovery	$750	1.00	1.00	$750.00
04/30/2018	Wash DPPA Swapp	edit letter to defendants re: plts discovery	$750	0.50	0.50	$375.00
05/01/2018	Wash DPPA Swapp	edit letter to defendants re: discovery	$750	0.40	0.40	$300.00
05/02/2018	Wash DPPA Swapp	call with T. Kirchofer re: discovery	$750	0.80	0.80	$600.00
05/02/2018	Wash DPPA Swapp	call with T. Kirchofer re: discovery	$750	0.70	0.70	$525.00
05/03/2018	Wash DPPA Swapp	edit settlement demand	$750	0.70	0.70	$525.00
05/03/2018	Wash DPPA Swapp	review/ edit settlement demand	$750	0.30	0.30	$225.00
05/04/2018	Wash DPPA Swapp	edit correspondence with defendants re: discovery	$750	0.20	0.20	$150.00
05/09/2018	Wash DPPA Swapp	edit subpoena to WSP	$750	0.50	0.50	$375.00
05/09/2018	Wash DPPA Swapp	review defendants 2nd amended answer	$750	0.40	0.40	$300.00
05/10/2018	Wash DPPA Swapp	edit subpoena to WSP	$750	0.50	0.50	$375.00
05/10/2018	Wash DPPA Swapp	edit joint motion to extend class cert deadline	$750	0.50	0.50	$375.00
05/11/2018	Wash DPPA Swapp	correspondence with B. Duffy re: extended class cert deadlines	$750	0.20	0.20	$150.00
05/11/2018	Wash DPPA Swapp	finalize settlement demand	$750	0.30	0.30	$225.00
05/13/2018	Wash DPPA Swapp	draft stipulation re: class cert	$750	1.00	1.00	$750.00
05/14/2018	Wash DPPA Swapp	correspondence with T. Jarrard re: motion for extension on class cert	$750	0.10	0.10	$75.00
05/18/2018	Wash DPPA Swapp	correspondence with R. McBride re: subpoena to Sweester	$750	0.10	0.10	$75.00
05/22/2018	Wash DPPA Swapp	review subpoena to Sweetser	$750	0.30	0.30	$225.00
05/22/2018	Wash DPPA Swapp	correspondence with R. McBride re: subpoena on Sweetser	$750	0.20	0.20	$150.00
05/23/2018	Wash DPPA Swapp	edit motion to compel defendants interrogs resp	$750	0.80	0.80	$600.00
05/24/2018	Wash DPPA Swapp	review/ edit letter to defendants re: discovery	$750	0.70	0.70	$525.00
05/24/2018	Wash DPPA Swapp	review/ comment on motion to compel	$750	0.50	0.50	$375.00
05/31/2018	Wash DPPA Swapp	correspondence with B. Duffy re: settlement	$750	0.10	0.10	$75.00
05/31/2018	Wash DPPA Swapp	call with B. Duffy re: settlement	$750	0.50	0.50	$375.00
06/02/2018	Wash DPPA Swapp	Review defendants privilege log	$750	1.00	1.00	$750.00
06/02/2018	Wash DPPA Swapp	Review defendants supplemental Rule 26(a) disclosures	$750	0.50	0.50	$375.00
06/03/2018	Wash DPPA Swapp	Review 5/29/18 letter from B. Duffy	$750	0.20	0.20	$150.00
06/03/2018	Wash DPPA Swapp	Correspondence w/ T. Kirchofer re May 30 letter from B. Duffy	$750	0.10	0.10	$75.00
06/05/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: Sweetser subpoena	$750	0.10	0.10	$75.00
06/06/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: CJTC subpoena	$750	0.10	0.10	$75.00
06/06/2018	Wash DPPA Swapp	correspondence with B. Duffy re: depositions	$750	0.30	0.30	$225.00
06/06/2018	Wash DPPA Swapp	call with T. Kirchofer re: Rule 30(b)(6)	$750	1.00	1.00	$750.00
06/06/2018	Wash DPPA Swapp	correspondence with B. Duffy re: depositions	$750	0.30	0.30	$225.00

06/06/2018	Wash DPPA Swapp	review objections to defendants subpoena on Sweetser	$750	0.30	0.30	$225.00
06/07/2018	Wash DPPA Swapp	Correspondence w/ T. Kirchofer re Rule 30(b) (6) deposition	$750	0.10	0.10	$75.00
06/07/2018	Wash DPPA Swapp	Review Batiste expert designations	$750	0.20	0.20	$150.00
06/07/2018	Wash DPPA Swapp	Correspondence w/ T Jarrard re objections to subpoena to Swapp	$750	0.30	0.30	$225.00
06/07/2018	Wash DPPA Swapp	Correspondence w/ B. Duffy re depositions	$750	0.40	0.40	$300.00
06/07/2018	Wash DPPA Swapp	Correspondence w/ J. Block re subpoena to WSP	$750	0.30	0.30	$225.00
06/07/2018	Wash DPPA Swapp	Edit Rule 30 (b)(G) deposition topics for WSP	$750	0.80	0.80	$600.00
06/08/2018	Wash DPPA Swapp	Correspondence w/ S. Williams re WSP deposition& correspond w/ t. Kirchofer re same	$750	0.20	0.20	$150.00
06/08/2018	Wash DPPA Swapp	Edit Rule 30 (b) (6) depositions for WSP	$750	0.40	0.40	$300.00
06/08/2018	Wash DPPA Swapp	Edit notice for WSP Rule 30 (b)(6) depostion	$750	0.20	0.20	$150.00
06/12/2018	Wash DPPA Swapp	call with T. Kirchofer re: discovery	$750	0.40	0.40	$300.00
06/12/2018	Wash DPPA Swapp	correspondence with B. Duffy re: depo locations	$750	0.10	0.10	$75.00
06/12/2018	Wash DPPA Swapp	correspondence with B. Duffy re: depo location	$750	0.30	0.30	$225.00
06/12/2018	Wash DPPA Swapp	review defendants 6/11/18 letter	$750	0.20	0.20	$150.00
06/13/2018	Wash DPPA Swapp	correspondence with B. Duffy re: WSP Rule 30(b)(6)	$750	0.50	0.50	$375.00
06/13/2018	Wash DPPA Swapp	call with T. Kirchofer	$750	0.30	0.30	$225.00
06/13/2018	Wash DPPA Swapp	correspondence with T. Jarrard re: Wilcox docs	$750	0.10	0.10	$75.00
06/14/2018	Wash DPPA Swapp	edit letter to B. Duffy re: discovery	$750	0.50	0.50	$375.00
06/15/2018	Wash DPPA Swapp	correspondence with S. Williams at WSP re: Rule 30 (b)(6) depo	$750	0.50	0.50	$375.00
06/15/2018	Wash DPPA Swapp	correspondence with B. Duffy re: depositions	$750	0.80	0.80	$600.00
06/15/2018	Wash DPPA Swapp	review WSP resp to 1st RFP and interrogations in Batiste	$750	0.30	0.30	$225.00
06/15/2018	Wash DPPA Swapp	correspondence with B. Duffy re: depositions	$750	0.20	0.20	$150.00
06/15/2018	Wash DPPA Swapp	correspondence with S. Williams re: WSP Rule 30(b0(6) deposition	$750	0.20	0.20	$150.00
06/18/2018	Wash DPPA Swapp	deposition of WSP - Part I (Gibbs)	$750	4.00	4.00	$3,000.00
06/18/2018	Wash DPPA Swapp	Deposition of WSP - Part II (Morhause)	$750	4.30	4.30	$3,225.00
06/19/2018	Wash DPPA Swapp	correspondence with T. Jarrard re: Wilcox prep	$750	0.10	0.10	$75.00
06/20/2018	Wash DPPA Swapp	review/ edit resp to Interrogs	$750	0.80	0.80	$600.00
06/20/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: CJTC subpoena	$750	0.10	0.10	$75.00
06/20/2018	Wash DPPA Swapp	prep for Wilcox depo prep	$750	0.20	0.20	$150.00
06/20/2018	Wash DPPA Swapp	prep for Wilcox depo prep	$750	0.80	0.80	$600.00
06/20/2018	Wash DPPA Swapp	travel to Wilcox depo prep (not billed elsewhere)	$750	1.30	1.30	$975.00
06/21/2018	Wash DPPA Swapp	review opp to motion to compel interrogs	$750	0.20	0.20	$150.00
06/21/2018	Wash DPPA Swapp	review/ draft subpoena to CJTC	$750	0.30	0.30	$225.00
06/21/2018	Wash DPPA Swapp	review docs to prep for Wilcox depo prep	$750	0.50	0.50	$375.00
06/21/2018	Wash DPPA Swapp	review docs to prep for Wilcox depo prep	$750	2.00	2.00	$1,500.00
06/21/2018	Wash DPPA Swapp	review docs to prep for Wilcox depo prep	$750	1.00	1.00	$750.00
06/21/2018	Wash DPPA Swapp	meet with J. Wilcox to prep for depo	$750	4.00	4.00	$3,000.00
06/22/2018	Wash DPPA Swapp	return travel from Wilcox depo prep (not billed elsewhere)	$750	3.00	3.00	$2,250.00
06/22/2018	Wash DPPA Swapp	correspondence with B. Duffy re: deposition availability	$750	0.10	0.10	$75.00

06/22/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: WSP testimony	$750	0.90	0.90	$675.00
06/22/2018	Wash DPPA Swapp	Call T. Jarrard re: Wilcox depo	$750	0.20	0.20	$150.00
06/24/2018	Wash DPPA Swapp	review and respond to letter from WSP atty re: Rule 30(b)(6) deposition	$750	0.40	0.40	$300.00
06/24/2018	Wash DPPA Swapp	correspondence with B. Duffy re: resp to Plts interrogs	$750	0.10	0.10	$75.00
06/24/2018	Wash DPPA Swapp	review draft on motion to compel	$750	0.30	0.30	$225.00
06/25/2018	Wash DPPA Swapp	review/ edit subpoena for Rule 30(b)(6) depo to CJTC	$750	0.30	0.30	$225.00
06/25/2018	Wash DPPA Swapp	review/ comment on reply on motion to compel	$750	1.20	1.20	$900.00
06/26/2018	Wash DPPA Swapp	Review Spokane PD procedure	$750	0.50	0.50	$375.00
06/27/2018	Wash DPPA Swapp	Edit reply brief on motion to compel interrogatories.	$750	0.50	0.50	$375.00
06/27/2018	Wash DPPA Swapp	Correspondence w. J. Kirchofer re: Spokane PD depostion	$750	0.20	0.20	$150.00
06/27/2018	Wash DPPA Swapp	Correspondence w/ Sweetsens and J.Janel re defendants proposal re: redacted documents	$750	0.20	0.20	$150.00
06/27/2018	Wash DPPA Swapp	Edit letter to B.Duffy re: interrogatories.	$750	0.40	0.40	$300.00
07/01/2018	Wash DPPA Swapp	Travel to Rule 30 (b) (6) depostion w/ WSP (not billed elsewhere)	$750	1.50	1.50	$1,125.00
07/01/2018	Wash DPPA Swapp	Travel to deposition (not billed elsewhere)	$750	1.50	1.50	$1,125.00
07/01/2018	Wash DPPA Swapp	Travel to and prepare for deposition of WSP	$750	4.50	4.50	$3,375.00
07/01/2018	Wash DPPA Swapp	Review materials for Rule 30(b)(6) depostion w/ WSP	$750	1.00	1.00	$750.00
07/01/2018	Wash DPPA Swapp	Travel to Rule 30(b)(6) deposition (not billed elsewhere)	$750	1.50	1.50	$1,125.00
07/01/2018	Wash DPPA Swapp	Travel to deposition of WSP (not billed elsewhere)	$750	1.50	1.50	$1,125.00
07/02/2018	Wash DPPA Swapp	Rule 30(b)(6) Deposition for WSP	$750	4.00	4.00	$3,000.00
07/02/2018	Wash DPPA Swapp	review/ edit motion to compel Interrogs No. 2-4	$750	0.40	0.40	$300.00
07/02/2018	Wash DPPA Swapp	Rule 30(b)(6) Deposition of WSP	$750	4.00	4.00	$3,000.00
07/03/2018	Wash DPPA Swapp	Review/edit letter to defendants re reduced documents	$750	0.30	0.30	$225.00
07/03/2018	Wash DPPA Swapp	Review letter to WSP re 30(6) (G) topics	$750	0.30	0.30	$225.00
07/06/2018	Wash DPPA Swapp	Review defendants 7/06/18 letter re discovery	$750	0.30	0.30	$225.00
07/08/2018	Wash DPPA Swapp	Review defendants letter re: interregatory response	$750	0.20	0.20	$150.00
07/17/2018	Wash DPPA Swapp	correspodence with T. Jarrard re: defendants proposal re redacted docs	$750	0.10	0.10	$75.00
07/17/2018	Wash DPPA Swapp	review defendants opp to motion to compel Interog Nos 2-4	$750	0.50	0.50	$375.00
07/18/2018	Wash DPPA Swapp	review defendants 2nd supplemental resp to plts 1st set of Interrogs	$750	0.50	0.50	$375.00
07/18/2018	Wash DPPA Swapp	correspondence with B. Duffy re: resp to Interrogs	$750	0.10	0.10	$75.00
07/18/2018	Wash DPPA Swapp	review class cert brief and comment thereon	$750	0.80	0.80	$600.00
07/19/2018	Wash DPPA Swapp	call with T. Kirchofer re: CJTC subpoena	$750	0.60	0.60	$450.00
07/19/2018	Wash DPPA Swapp	review timeline re: CJTC re: deposition	$750	0.20	0.20	$150.00
07/20/2018	Wash DPPA Swapp	call with T. Kirchofer re: class cert	$750	0.10	0.10	$75.00
07/20/2018	Wash DPPA Swapp	edit motion for extension (opposed) on reply on motion to compel	$750	0.60	0.60	$450.00
07/24/2018	Wash DPPA Swapp	correspondence with B. Duffy re: redacted documents	$750	0.40	0.40	$300.00
07/24/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: Amended Complaint	$750	0.20	0.20	$150.00
07/24/2018	Wash DPPA Swapp	prep for DOL depo	$750	1.20	1.20	$900.00

07/24/2018	Wash DPPA Swapp	review and comment on draft class cert brief	$750	0.80	0.80	$600.00
07/26/2018	Wash DPPA Swapp	review defendants correspondence re: Sweetser subpoena and correspondence with T. Jarrard and M. Love re: same	$750	0.30	0.30	$225.00
07/26/2018	Wash DPPA Swapp	review newly produced PTCR presentation	$750	0.30	0.30	$225.00
07/26/2018	Wash DPPA Swapp	correspondence with S. Williams re: Rule 30(b)(6) ?	$750	0.10	0.10	$75.00
07/26/2018	Wash DPPA Swapp	prep for CJTC depo	$750	0.90	0.90	$675.00
07/26/2018	Wash DPPA Swapp	correspondence with ? re: Rule 30(b)(6) depo	$750	0.30	0.30	$225.00
07/26/2018	Wash DPPA Swapp	prep for CJTC depo	$750	1.80	1.80	$1,350.00
07/27/2018	Wash DPPA Swapp	prep for CJTC depo	$750	3.20	3.20	$2,400.00
07/27/2018	Wash DPPA Swapp	Rule 30(b)(6) depo of CJTC	$750	4.50	4.50	$3,375.00
07/29/2018	Wash DPPA Swapp	Prepare for Rule 30 (b)(6) deposition of DOL	$750	2.50	2.50	$1,875.00
07/30/2018	Wash DPPA Swapp	Prepare for Rule 30(b)(6) deposition of DOL	$750	3.00	3.00	$2,250.00
07/30/2018	Wash DPPA Swapp	Correspondence w/ T. Kirchofer re defendants response to motion to compel.	$750	0.10	0.10	$75.00
07/30/2018	Wash DPPA Swapp	Correspondence w/ T. Kirchofer re: class certification briefing	$750	0.30	0.30	$225.00
07/30/2018	Wash DPPA Swapp	Deposition of DOL	$750	11.00	11.00	$8,250.00
07/30/2018	Wash DPPA Swapp	Calls w/ T. Jarrard & T. Kirchofer re DOL depositions	$750	0.50	0.50	$375.00
07/30/2018	Wash DPPA Swapp	Return travel to Seattle from DOL deposition	$750	1.50	1.50	$1,125.00
07/31/2018	Wash DPPA Swapp	Edit reply on 2nd motion to compel first interrogatories	$750	0.50	0.50	$375.00
07/31/2018	Wash DPPA Swapp	Correspondence w/ T. Jarrard re Spokane PD deposition	$750	0.20	0.20	$150.00
07/31/2018	Wash DPPA Swapp	Return travel from DOL deposition (not billed elsewhere)	$750	2.00	2.00	$1,500.00
07/31/2018	Wash DPPA Swapp	Edit Wilcox declaration re class	$750	0.90	0.90	$675.00
07/31/2018	Wash DPPA Swapp	Review changes to 30(b)(6) deposition	$750	0.10	0.10	$75.00
07/31/2018	Wash DPPA Swapp	Return travel from deposition (not billed elsewhere)	$750	1.00	1.00	$750.00
08/01/2018	Wash DPPA Swapp	Review/edit amended complaint	$750	1.00	1.00	$750.00
08/01/2018	Wash DPPA Swapp	Revise/edit amended complaint	$750	1.20	1.20	$900.00
08/01/2018	Wash DPPA Swapp	Edit amended complaint	$750	0.60	0.60	$450.00
08/02/2018	Wash DPPA Swapp	Edit brief in support of class certification	$750	2.30	2.30	$1,725.00
08/02/2018	Wash DPPA Swapp	Correspondence w/ T. Kirchofer re motion to amend complaint	$750	0.10	0.10	$75.00
08/02/2018	Wash DPPA Swapp	Edit brief in support of class certification	$750	0.50	0.50	$375.00
08/02/2018	Wash DPPA Swapp	Edit brief in support of class certification	$750	1.00	1.00	$750.00
08/03/2018	Wash DPPA Swapp	Review deposition of Spokane PD deposition.	$750	0.60	0.60	$450.00
08/03/2018	Wash DPPA Swapp	Edit index of exhibits to class certification motion	$750	0.60	0.60	$450.00
08/04/2018	Wash DPPA Swapp	Edit class certification brief	$750	1.90	1.90	$1,425.00
08/04/2018	Wash DPPA Swapp	Edit class certification brief	$750	2.00	2.00	$1,500.00
08/05/2018	Wash DPPA Swapp	Edit class certification brief	$750	2.00	2.00	$1,500.00
08/06/2018	Wash DPPA Swapp	edit class certification brief	$750	0.90	0.90	$675.00
08/06/2018	Wash DPPA Swapp	Review/edit motion to amend complaint	$750	1.00	1.00	$750.00
08/06/2018	Wash DPPA Swapp	Review and respond to complaint re: class certification brief from T. Kirchofer & M. Siegel,	$750	0.50	0.50	$375.00

08/06/2018	Wash DPPA Swapp	Review declaration in support of motion to amend complaint and class certification.	$750	0.50	0.50	$375.00
08/07/2018	Wash DPPA Swapp	Review and comment on brief on class certification	$750	0.40	0.40	$300.00
08/07/2018	Wash DPPA Swapp	Review and edit motion to amend complaint	$750	0.50	0.50	$375.00
08/07/2018	Wash DPPA Swapp	Correspondence w/ T. Jarrard re: hearing on motion on 8/30	$750	0.10	0.10	$75.00
08/07/2018	Wash DPPA Swapp	Correspondence w D. Kirchofer & T. Jarrard re: Duffy response to amended complaint	$750	0.10	0.10	$75.00
08/08/2018	Wash DPPA Swapp	Correspondence w/ defendants re: amended complaint	$750	0.60	0.60	$450.00
08/13/2018	Wash DPPA Swapp	Correspondence w/ B. Duffy re stipulation of amended complaints	$750	0.40	0.40	$300.00
08/14/2018	Wash DPPA Swapp	Call w/ R. Kirchofer re: discrepancy	$750	0.10	0.10	$75.00
08/14/2018	Wash DPPA Swapp	Edit stipulation re amended complaints	$750	0.40	0.40	$300.00
08/15/2018	Wash DPPA Swapp	Edit stipulation re: amended complaint and correspond w/ defendants re: same	$750	0.80	0.80	$600.00
08/15/2018	Wash DPPA Swapp	Correspondence w/ T. Jarrard and B. Duffy re stipulation re amended complaint	$750	0.10	0.10	$75.00
08/15/2018	Wash DPPA Swapp	Call w/ T. Kirchofer re: discrepancy	$750	0.50	0.50	$375.00
08/17/2018	Wash DPPA Swapp	Review order on motion to compel.	$750	0.40	0.40	$300.00
08/21/2018	Wash DPPA Swapp	Correspondence w/ T Kirchofer re: various followup re: discrepancy	$750	0.40	0.40	$300.00
08/22/2018	Wash DPPA Swapp	Correspondence w/ T. Kirchofer re status	$750	0.30	0.30	$225.00
08/23/2018	Wash DPPA Swapp	Call w/ T. Kirchifer & M. Smith re case	$750	0.40	0.40	$300.00
08/23/2018	Wash DPPA Swapp	review memo re deposition errata	$750	2.00	2.00	$1,500.00
08/24/2018	Wash DPPA Swapp	Review research on changed deposition errata	$750	0.20	0.20	$150.00
08/31/2018	Wash DPPA Swapp	Review correspondence from T. Jarrard re hearing on sanction on motion to compel.	$750	0.10	0.10	$75.00
08/31/2018	Wash DPPA Swapp	Review minute notes of hearing on motion for sanctions on motion to compel	$750	0.10	0.10	$75.00
09/07/2018	Wash DPPA Swapp	Correspondence w/ M. Smith re meet and confer w/ defendants	$750	0.30	0.30	$225.00
09/11/2018	Wash DPPA Swapp	Review defendants motion to compel Sweetser	$750	0.70	0.70	$525.00
09/12/2018	Wash DPPA Swapp	Review order on motion to compel	$750	0.30	0.30	$225.00
09/12/2018	Wash DPPA Swapp	Review defendants MTD amended complaint	$750	0.40	0.40	$300.00
09/17/2018	Wash DPPA Swapp	Correspondence w/ T. Jarrard and B, Duffy re: overall goal on MTD and classification	$750	0.20	0.20	$150.00
09/17/2018	Wash DPPA Swapp	Call w/ M. Smith re redacted docs	$750	0.20	0.20	$150.00
09/17/2018	Wash DPPA Swapp	Call w/ M. Smith re resolution of discovery dispute over redacted documents	$750	0.20	0.20	$150.00
09/18/2018	Wash DPPA Swapp	Call w/ M. Smith re redacted docs	$750	0.20	0.20	$150.00
09/18/2018	Wash DPPA Swapp	Correspondence w/ M Smith re redacted docs	$750	0.20	0.20	$150.00
09/19/2018	Wash DPPA Swapp	Call w/ B. Swapp re: discovery	$750	0.40	0.40	$300.00
09/19/2018	Wash DPPA Swapp	Call w/ T. Jarrard re discovery	$750	0.50	0.50	$375.00
09/19/2018	Wash DPPA Swapp	Review/edit stipulation re: redacted docs	$750	0.70	0.70	$525.00
09/20/2018	Wash DPPA Swapp	Edit stipulation re redacted docs	$750	0.60	0.60	$450.00
09/20/2018	Wash DPPA Swapp	Correspondence w/ T. Jarrard re punitive discrepancy	$750	0.10	0.10	$75.00
09/20/2018	Wash DPPA Swapp	Call w/ M. Smith re stipulation re unredacted documents	$750	0.30	0.30	$225.00
09/20/2018	Wash DPPA Swapp	Review of draft RFPs re: punitive damages	$750	0.30	0.30	$225.00

09/21/2018	Wash DPPA Swapp	Correspondence w/ T. Jarrard re discrepancy from defendants re punitive damages	$750	0.20	0.20	$150.00
09/21/2018	Wash DPPA Swapp	Correspondence w/ T. Jarrard re discrepancy re punitives	$750	0.10	0.10	$75.00
09/23/2018	Wash DPPA Swapp	Review defendants MTD and draft opposition to MTD	$750	1.00	1.00	$750.00
09/24/2018	Wash DPPA Swapp	Review briefing on proposed MTD for opposition to defendant 2nd MTD	$750	1.00	1.00	$750.00
09/24/2018	Wash DPPA Swapp	Review defendants 2nd supplemental Rule 26(a) disclosures	$750	0.40	0.40	$300.00
09/26/2018	Wash DPPA Swapp	Edit stipulation re redacted claims	$750	1.00	1.00	$750.00
09/27/2018	Wash DPPA Swapp	Edit opposition to MTD	$750	6.00	6.00	$4,500.00
09/28/2018	Wash DPPA Swapp	Edit opposition to MTD	$750	1.20	1.20	$900.00
09/28/2018	Wash DPPA Swapp	Edit opposition to MTD	$750	1.20	1.20	$900.00
09/28/2018	Wash DPPA Swapp	Edit opposition to MTD	$750	1.90	1.90	$1,425.00
10/02/2018	Wash DPPA Swapp	Discuss w/ C. Downes re defendant opposition to class certification	$750	0.80	0.80	$600.00
10/02/2018	Wash DPPA Swapp	Review/edit final opposition to 2nd MTD	$750	0.70	0.70	$525.00
10/03/2018	Wash DPPA Swapp	Review reply memo on motion to compel Sweetser	$750	0.30	0.30	$225.00
10/03/2018	Wash DPPA Swapp	Review/Edit final opposition to MTD amended complaint	$750	0.50	0.50	$375.00
10/15/2018	Wash DPPA Swapp	Correspondence w/ B. Duffy re: stay of discovery	$750	0.20	0.20	$150.00
10/15/2018	Wash DPPA Swapp	Correspndence w/ B. Duffy re: stay	$750	0.10	0.10	$75.00
10/16/2018	Wash DPPA Swapp	Correspondence w/ B. Duffy re: stipulation re: Quick Peek Document?	$750	0.20	0.20	$150.00
10/22/2018	Wash DPPA Swapp	Correspondence w/ B. Duffy re: stipulation on redacted documents and stay of discrepancy	$750	0.30	0.30	$225.00
10/26/2018	Wash DPPA Swapp	Review draft class certification reply	$750	0.70	0.70	$525.00
10/31/2018	Wash DPPA Swapp	Edit reply brief on class certification	$750	1.70	1.70	$1,275.00
10/31/2018	Wash DPPA Swapp	Edit reply brief on class certification	$750	1.50	1.50	$1,125.00
10/31/2018	Wash DPPA Swapp	Edit reply brief on class certification	$750	0.50	0.50	$375.00
10/31/2018	Wash DPPA Swapp	Edit reply brief on class certification	$750	4.00	4.00	$3,000.00
10/31/2018	Wash DPPA Swapp	Edit reply brief on class certification	$750	0.50	0.50	$375.00
11/19/2018	Wash DPPA Swapp	Prepare for hearing on MTD amended complaint	$750	3.00	3.00	$2,250.00
11/19/2018	Wash DPPA Swapp	Prepare for hearing on MTD amended complaint	$750	3.80	3.80	$2,850.00
11/20/2018	Wash DPPA Swapp	Prepare for hearing on MTD	$750	2.50	2.50	$1,875.00
11/20/2018	Wash DPPA Swapp	Prepare for argument on MTD	$750	2.80	2.80	$2,100.00
11/20/2018	Wash DPPA Swapp	Hearing on MTD	$750	1.30	1.30	$975.00
12/06/2018	Wash DPPA Swapp	Review order denying defendant motion to compel Sweetser	$750	0.20	0.20	$150.00
12/08/2018	Wash DPPA Swapp	Correspondence w/ M. Love re: order on motion to compel	$750	0.10	0.10	$75.00
12/08/2018	Wash DPPA Swapp	Prepare for class certification hearing	$750	4.00	4.00	$3,000.00
12/09/2018	Wash DPPA Swapp	Prepare for class certification hearing	$750	3.00	3.00	$2,250.00
12/10/2018	Wash DPPA Swapp	Review materials for class certification hearing	$750	1.80	1.80	$1,350.00
12/11/2018	Wash DPPA Swapp	Prepare for class certification hearing	$750	3.00	3.00	$2,250.00
12/12/2018	Wash DPPA Swapp	Prepare for class certification hearing	$750	1.50	1.50	$1,125.00
12/13/2018	Wash DPPA Swapp	Class certification hearing	$750	1.30	1.30	$975.00
12/21/2018	Wash DPPA Swapp	Review order on insurer ____ to detail?/indemnify	$750	0.20	0.20	$150.00

12/21/2018	Wash DPPA Swapp	Correspondence w/ defendants counsel re: decision re: claime? toe indemnify/defense?	$750	0.20	0.20	$150.00
12/21/2018	Wash DPPA Swapp	Review decision on ST in Wilcox vs. Batiste	$750	0.40	0.40	$300.00
01/24/2019	Wash DPPA Swapp	Review order on MTD	$825	0.40	0.40	$330.00
01/25/2019	Wash DPPA Swapp	Review order on motion to certify class	$825	0.50	0.50	$412.50
01/28/2019	Wash DPPA Swapp	Call w/ T. Jarrard re: discovery and class notes	$825	0.50	0.50	$412.50
01/28/2019	Wash DPPA Swapp	Call w/ J. Leviton re: settlement and status of case	$825	0.70	0.70	$577.50
01/29/2019	Wash DPPA Swapp	Review spreadsheets to determine class data for class notice	$825	0.80	0.80	$660.00
01/29/2019	Wash DPPA Swapp	Review class data from notice	$825	0.60	0.60	$495.00
01/30/2019	Wash DPPA Swapp	Correspondence w/ T. Jarrard re: class certification	$825	0.20	0.20	$165.00
01/31/2019	Wash DPPA Swapp	Correspondence w/ defendants counsel and w/ B. Duffy re: status report	$825	0.20	0.20	$165.00
01/31/2019	Wash DPPA Swapp	Call w/ J. Leviton re: notice	$825	0.20	0.20	$165.00
02/01/2019	Wash DPPA Swapp	Correspondence w/ J. Leviton re: discovery	$825	0.30	0.30	$247.50
02/04/2019	Wash DPPA Swapp	Review draft joint status report and conv w/ C. Downes re: same	$825	0.30	0.30	$247.50
02/04/2019	Wash DPPA Swapp	Edit joint status report	$825	0.90	0.90	$742.50
02/04/2019	Wash DPPA Swapp	Correspondence w/ B. Duffy re: settlement status conference	$825	0.20	0.20	$165.00
02/04/2019	Wash DPPA Swapp	Edit joint status report	$825	0.30	0.30	$247.50
02/08/2019	Wash DPPA Swapp	Draft settlement demand to defendants	$825	0.50	0.50	$412.50
02/08/2019	Wash DPPA Swapp	Review defendants motion for reconsideration	$825	0.30	0.30	$247.50
02/08/2019	Wash DPPA Swapp	Correspondence w/ B. Duffy re: status report.	$825	0.20	0.20	$165.00
02/08/2019	Wash DPPA Swapp	Correspondence w/ J. Leviton re: settlement	$825	0.10	0.10	$82.50
02/08/2019	Wash DPPA Swapp	Review defendants edits to status report and revise same	$825	0.60	0.60	$495.00
02/08/2019	Wash DPPA Swapp	Review defendants edits to status report and revise same	$825	0.20	0.20	$165.00
02/15/2019	Wash DPPA Swapp	Review RFP for class notice	$825	0.40	0.40	$330.00
02/15/2019	Wash DPPA Swapp	Correspondence w/ M. Siegel re: RFPs for class notice	$825	0.50	0.50	$412.50
02/17/2019	Wash DPPA Swapp	Correspondence w/ defendants re: settlement	$825	0.50	0.50	$412.50
02/17/2019	Wash DPPA Swapp	Review deposition for malpractice case v. Swapp	$825	0.90	0.90	$742.50
02/20/2019	Wash DPPA Swapp	Call w/ defendants counsel re: discovery and settlement	$825	0.70	0.70	$577.50
03/06/2019	Wash DPPA Swapp	Call w/ Sr. Judge Suko re: settlement conference	$825	0.50	0.50	$412.50
03/06/2019	Wash DPPA Swapp	Call w/ T. Jarrard re: settlement	$825	0.10	0.10	$82.50
03/18/2019	Wash DPPA Swapp	Review order on settlement conference	$825	0.20	0.20	$165.00
03/20/2019	Wash DPPA Swapp	Correspondence w/ T. Jarrard re: settlement conference	$825	0.20	0.20	$165.00
03/20/2019	Wash DPPA Swapp	Correspondence w/ T. Jarrard re: settlement conference	$825	0.10	0.10	$82.50
03/25/2019	Wash DPPA Swapp	Edit letter to Judge Suko re: settlement conference	$825	0.50	0.50	$412.50
04/30/2019	Wash DPPA Swapp	Review email documents to prepare for call	$825	0.50	0.50	$412.50
04/30/2019	Wash DPPA Swapp	Call w/ mediator/settlement judge	$825	0.40	0.40	$330.00
04/30/2019	Wash DPPA Swapp	Call w/ T. Jarrard re: mediation	$825	0.40	0.40	$330.00
05/08/2019	Wash DPPA Swapp	Call w/ D. File re: settlement action proposal	$825	0.30	0.30	$247.50
05/15/2019	Wash DPPA Swapp	Review RG2 settlement admin bid	$825	0.30	0.30	$247.50
05/20/2019	Wash DPPA Swapp	Correspondence w/ T. Jarrard re: mediation	$825	0.20	0.20	$165.00

05/21/2019	Wash DPPA Swapp	Review updated financial disclosures and E. West report	$825	1.50	1.50	$1,237.50
05/22/2019	Wash DPPA Swapp	Travel to Yakima for settlement offered (not billed elsewhere)	$825	0.70	0.70	$577.50
05/22/2019	Wash DPPA Swapp	Travel to Yakima for settlement offered (not billed elsewhere)	$825	4.00	4.00	$3,300.00
05/23/2019	Wash DPPA Swapp	Settlement conference	$825	9.00	9.00	$7,425.00
05/23/2019	Wash DPPA Swapp	Travel from settlement conference	$825	2.50	2.50	$2,062.50
05/30/2019	Wash DPPA Swapp	Review transcript of settlement conference/term sheet	$825	0.70	0.70	$577.50
07/11/2019	Wash DPPA Swapp	Correspondence w/ J. Kim re: settlement	$825	0.20	0.20	$165.00
07/11/2019	Wash DPPA Swapp	Review draft settlement agreement	$825	0.20	0.20	$165.00
07/18/2019	Wash DPPA Swapp	Review escrow agreement	$825	1.50	1.50	$1,237.50
07/18/2019	Wash DPPA Swapp	Edit settlement agreement	$825	2.00	2.00	$1,650.00
07/19/2019	Wash DPPA Swapp	Edit settlement agreement	$825	1.80	1.80	$1,485.00
07/19/2019	Wash DPPA Swapp	Edit settlement agreement	$825	1.00	1.00	$825.00
07/19/2019	Wash DPPA Swapp	Edit settlement agreement	$825	1.30	1.30	$1,072.50
07/19/2019	Wash DPPA Swapp	Edit settlement agreement	$825	0.50	0.50	$412.50
08/22/2019	Wash DPPA Swapp	Edit settlement ageement	$825	0.50	0.50	$412.50
08/23/2019	Wash DPPA Swapp	Edit settlement agreement	$825	0.80	0.80	$660.00
08/23/2019	Wash DPPA Swapp	Edit settlement agreement	$825	0.50	0.50	$412.50
08/23/2019	Wash DPPA Swapp	Edit settlement agreement	$825	0.50	0.50	$412.50
08/23/2019	Wash DPPA Swapp	Edit settlement agreement	$825	1.60	1.60	$1,320.00
08/26/2019	Wash DPPA Swapp	Edit settlement agreement	$825	5.00	5.00	$4,125.00
08/26/2019	Wash DPPA Swapp	Correspondence w/ J. king re: settlement	$825	0.40	0.40	$330.00
08/26/2019	Wash DPPA Swapp	Review T. Jarrard comments on settlement and final agreement to defendants	$825	0.50	0.50	$412.50
08/27/2019	Wash DPPA Swapp	Edit settlement conference	$825	1.00	1.00	$825.00
08/28/2019	Wash DPPA Swapp	Edit settlement conference	$825	1.00	1.00	$825.00
08/28/2019	Wash DPPA Swapp	Review payments for settlement order	$825	0.30	0.30	$247.50
08/29/2019	Wash DPPA Swapp	Edit class notice	$825	1.00	1.00	$825.00
08/30/2019	Wash DPPA Swapp	Edit class notice	$825	0.70	0.70	$577.50
09/06/2019	Wash DPPA Swapp	Draft letter to J. King re: settlement	$825	0.50	0.50	$412.50
09/23/2019	Wash DPPA Swapp	Edit motion for preliminary appeal	$825	2.00	2.00	$1,650.00
09/26/2019	Wash DPPA Swapp	Review class data	$825	1.00	1.00	$825.00
09/28/2019	Wash DPPA Swapp	Correspondence w/ J. King re: settlement agreement	$825	0.10	0.10	$82.50
10/01/2019	Wash DPPA Swapp	Review defendants letter re: settlement agreement	$825	0.20	0.20	$165.00
10/02/2019	Wash DPPA Swapp	Review settlement administration reissued bid	$825	0.30	0.30	$247.50
10/02/2019	Wash DPPA Swapp	Review letter from J. King and correspondence w/ J. King re: settlement edits	$825	0.20	0.20	$165.00
10/03/2019	Wash DPPA Swapp	Review proposals for settlement date	$825	0.40	0.40	$330.00
10/03/2019	Wash DPPA Swapp	Edit settlement conference	$825	0.40	0.40	$330.00
10/03/2019	Wash DPPA Swapp	Edit settlement agreement	$825	2.90	2.90	$2,392.50
10/04/2019	Wash DPPA Swapp	Edit settlement agreement	$825	0.50	0.50	$412.50
10/04/2019	Wash DPPA Swapp	Review charts re: administrative services	$825	0.30	0.30	$247.50
10/04/2019	Wash DPPA Swapp	Review charts re: administrative services	$825	0.50	0.50	$412.50

10/09/2019	Wash DPPA Swapp	Edit motion for preliminary appeal	$825	1.80	1.80	$1,485.00
10/11/2019	Wash DPPA Swapp	Review Plan of Allocation	$825	0.80	0.80	$660.00
10/15/2019	Wash DPPA Swapp	Correspondence w/ C. Downes re: motion for preliminary appeal	$825	0.50	0.50	$412.50
10/15/2019	Wash DPPA Swapp	Edit final settlement conference	$825	0.50	0.50	$412.50
10/15/2019	Wash DPPA Swapp	Correspondence w. defendants re: settlement	$825	0.20	0.20	$165.00
10/16/2019	Wash DPPA Swapp	Edit preliminary approval order	$825	1.10	1.10	$907.50
10/16/2019	Wash DPPA Swapp	Edit plan of allocation	$825	1.60	1.60	$1,320.00
10/18/2019	Wash DPPA Swapp	Correspondence w/ C. Downes re: bids	$825	0.40	0.40	$330.00
10/24/2019	Wash DPPA Swapp	Review settlement administration bids	$825	0.50	0.50	$412.50
10/25/2019	Wash DPPA Swapp	Edit preliminary approval motion	$825	0.40	0.40	$330.00
10/25/2019	Wash DPPA Swapp	Approve finalization of preliminary approval motion	$825	0.20	0.20	$165.00
10/31/2019	Wash DPPA Swapp	Review 9th Circuit division in Sirius XM	$825	0.30	0.30	$247.50
11/24/2019	Wash DPPA Swapp	Prepare for hearing on preliminary approval	$825	1.90	1.90	$1,567.50
11/25/2019	Wash DPPA Swapp	Prepare for preliminary approval hearing	$825	4.00	4.00	$3,300.00
11/25/2019	Wash DPPA Swapp	Preliminary approval hearing	$825	1.50	1.50	$1,237.50
11/27/2019	Wash DPPA Swapp	Review order on preliminary approval	$825	0.30	0.30	$247.50
12/24/2019	Wash DPPA Swapp	Correspondence w/ Settlement admin re: website	$825	0.20	0.20	$165.00
12/26/2019	Wash DPPA Swapp	Edit class notice	$825	0.50	0.50	$412.50
12/26/2019	Wash DPPA Swapp	Research re: service awards	$825	1.00	1.00	$825.00
12/26/2019	Wash DPPA Swapp	Review/edit final class notice	$825	0.60	0.60	$495.00
12/27/2019	Wash DPPA Swapp	Correspondence w/ T. Jarrard	$825	0.40	0.40	$330.00
12/27/2019	Wash DPPA Swapp	Review Settlement Administrator statement of Washington	$825	0.30	0.30	$247.50
12/30/2019	Wash DPPA Swapp	Correspondence w/ J. Sweetser re: service award	$825	0.10	0.10	$82.50
01/02/2020	Wash DPPA Swapp	Review defendants letter re: class data and correspondence w/ defendants re: class data exclusions	$875	0.50	0.50	$437.50
01/02/2020	Wash DPPA Swapp	Correspondence w/ Settlement Administrator re: exclusions from class data	$875	0.50	0.50	$437.50
01/02/2020	Wash DPPA Swapp	Correspondence w/ M. Siegel re: wire transfer re: class notice ce?	$875	0.20	0.20	$175.00
01/02/2020	Wash DPPA Swapp	Review defendants response re: exclusions from class data	$875	0.10	0.10	$87.50
01/02/2020	Wash DPPA Swapp	Review Sweetzer fees	$875	0.80	0.80	$700.00
01/05/2020	Wash DPPA Swapp	Correspondence w/ J. Sweetser re: fee submission	$875	0.50	0.50	$437.50
01/07/2020	Wash DPPA Swapp	Review website	$875	0.40	0.40	$350.00
01/08/2020	Wash DPPA Swapp	Correspondence w/ J. Sweetser re: fees	$875	0.70	0.70	$612.50
01/09/2020	Wash DPPA Swapp	Correspondence w/ A.J. Jeter re: Statement of work	$875	0.70	0.70	$612.50
01/16/2020	Wash DPPA Swapp	Review Settlement Admin class list for notice	$875	0.20	0.20	$175.00
01/21/2020	Wash DPPA Swapp	Correspondence w/ D. Vifol re: potential expert opinion on settlement	$875	0.20	0.20	$175.00
01/24/2020	Wash DPPA Swapp	Correspondence w/ R. Vigil re: value or non-monetary relief	$875	0.10	0.10	$87.50
01/27/2020	Wash DPPA Swapp	Call w/ C. Clapp re: Angeion statement of work	$875	0.30	0.30	$262.50
02/06/2020	Wash DPPA Swapp	Review settlement webpage	$875	0.30	0.30	$262.50
			Total Labor For Joe Barton	**451.30**	**451.30**	**$342,059.50**

Matt Smith						
08/23/2018	Wash DPPA Swapp	Call with J. Barton and T. Kirchofer re: Swapp deposition preparation	$600	0.50	0.50	$300.00
08/23/2018	Wash DPPA Swapp	Read pleadings and discovery materials to-date	$600	1.40	1.40	$840.00
08/23/2018	Wash DPPA Swapp	Call with Ming Siegel re: review of Swapp production	$600	0.40	0.40	$240.00
08/23/2018	Wash DPPA Swapp	Call with T. Kirchofer re: document review of swapp production	$600	0.30	0.30	$180.00
08/23/2018	Wash DPPA Swapp	Review Swapp production	$600	2.40	2.40	$1,440.00
08/24/2018	Wash DPPA Swapp	Review T. Kirchofer memo re: deposition errata sheet	$600	0.10	0.10	$60.00
08/24/2018	Wash DPPA Swapp	Swapp document review	$600	0.80	0.80	$480.00
08/24/2018	Wash DPPA Swapp	Review Joel Hallberg Docs	$600	2.00	2.00	$1,200.00
08/24/2018	Wash DPPA Swapp	Review Derek Sanders docs	$600	2.00	2.00	$1,200.00
08/27/2018	Wash DPPA Swapp	Review background info on Swapp witnesses	$600	0.30	0.30	$180.00
08/27/2018	Wash DPPA Swapp	Review Joel Hallberg docs	$600	0.30	0.30	$180.00
08/30/2018	Wash DPPA Swapp	Review quick-peek docs from defendants	$600	0.70	0.70	$420.00
08/30/2018	Wash DPPA Swapp	Review defendants' quick peek production	$600	0.70	0.70	$420.00
08/30/2018	Wash DPPA Swapp	Review Swapp quick peek docs	$600	1.80	1.80	$1,080.00
08/31/2018	Wash DPPA Swapp	Review Swapp quick peek docs and make notes	$600	1.10	1.10	$660.00
08/31/2018	Wash DPPA Swapp	Finish Swapp quick peak review and make notes	$600	1.00	1.00	$600.00
09/06/2018	Wash DPPA Swapp	Review quick peek docs and send meet and confer email to Barbara	$600	0.50	0.50	$300.00
09/06/2018	Wash DPPA Swapp	Review Joel Hallberg docs	$600	0.60	0.60	$360.00
09/07/2018	Wash DPPA Swapp	Review investigator documents	$600	0.40	0.40	$240.00
09/11/2018	Wash DPPA Swapp	Review quick peek docs in preparation for meet and confer	$600	1.00	1.00	$600.00
09/11/2018	Wash DPPA Swapp	Search for contact information of former Swapp employees	$600	0.50	0.50	$300.00
09/11/2018	Wash DPPA Swapp	Call with B. Duffy re: quick peek redactions	$600	1.30	1.30	$780.00
10/02/2018	Wash DPPA Swapp	Review Swapp MTD opposition	$600	0.60	0.60	$360.00
10/09/2018	Wash DPPA Swapp	Call with J. Barton, V. Cheng, M. Siegel, re: case status	$600	0.60	0.60	$360.00
10/09/2018	Wash DPPA Swapp	Review Swapp documents	$600	0.60	0.60	$360.00
10/19/2018	Wash DPPA Swapp	Email to B. Duffy re: documents to be covered by stipulation	$600	0.40	0.40	$240.00
11/06/2018	Wash DPPA Swapp	Call with Colin Downes re: Swapp doc review	$600	0.20	0.20	$120.00
			Total Labor For Matt Smith	**22.50**	**22.50**	**$13,500.00**
Ming Siegel						
08/23/2017	Wash DPPA Swapp	Drafting Motions for PHV for Joe Barton and Tom Kirchofer	$225	0.50	0.50	$112.50
08/24/2017	Wash DPPA Swapp	Preparing PHV Motions and ECF login forms for Joe Barton and Tom Kirchofer	$225	1.50	1.50	$337.50
08/25/2017	Wash DPPA Swapp	Drafting Jason Leviton Motion for PHV	$225	0.50	0.50	$112.50
08/28/2017	Wash DPPA Swapp	Call with Thomas Jarrard and E.D. Wash. Clerk RE PHV motions.	$225	0.30	0.30	$67.50
08/29/2017	Wash DPPA Swapp	Finalizing Jason's PHV and sending to Tom Jarrard	$225	0.30	0.30	$67.50
09/19/2017	Wash DPPA Swapp	Manage case files regarding Complaint	$225	0.50	0.50	$112.50
11/07/2017	Wash DPPA Swapp	Drafting Opp to MTD and Request for Judicial Notice	$225	0.90	0.90	$202.50

11/07/2017	Wash DPPA Swapp	Assisting with drafting Opp to Motion to Dismiss	$225	0.70	0.70	$157.50
11/07/2017	Wash DPPA Swapp	Assisting with drafting Opp to Motion to Dismiss	$225	1.20	1.20	$270.00
11/07/2017	Wash DPPA Swapp	Assisting with preparing for motion to dismiss hearing	$225	0.40	0.40	$90.00
11/10/2017	Wash DPPA Swapp	Cite checking and editing Opp to MTD	$225	2.80	2.80	$630.00
11/10/2017	Wash DPPA Swapp	Cite checking and editing Opp to MTD	$225	1.00	1.00	$225.00
11/13/2017	Wash DPPA Swapp	Cite checking Opp to Judicial Notice	$225	1.00	1.00	$225.00
11/13/2017	Wash DPPA Swapp	Cite checking Opp to Judicial Notice	$225	1.00	1.00	$225.00
11/13/2017	Wash DPPA Swapp	Drafting Siegel declaration RE Judicial Notice	$225	0.40	0.40	$90.00
11/13/2017	Wash DPPA Swapp	Editing Opp to Motion to Dismiss	$225	1.30	1.30	$292.50
11/13/2017	Wash DPPA Swapp	Editing Opp to Motion to Dismiss	$225	0.60	0.60	$135.00
11/13/2017	Wash DPPA Swapp	Editing Opp to Motion to Dismiss	$225	0.60	0.60	$135.00
11/13/2017	Wash DPPA Swapp	Finalizing and filing Opp to MTD and Opp to Judicial Notice	$225	0.80	0.80	$180.00
11/29/2017	Wash DPPA Swapp	Assist with Prep for Hearing on MTD	$225	0.70	0.70	$157.50
11/29/2017	Wash DPPA Swapp	Assist with Prep for hearing on MTD	$225	0.50	0.50	$112.50
12/11/2017	Wash DPPA Swapp	Assist with Prep for Hearing on MTD	$225	2.00	2.00	$450.00
12/12/2017	Wash DPPA Swapp	Assist with Prep for Hearing on MTD	$225	4.00	4.00	$900.00
12/13/2017	Wash DPPA Swapp	Assist with Prep for Hearing on MTD	$225	1.80	1.80	$405.00
12/13/2017	Wash DPPA Swapp	Assist with Prep for Hearing on MTD	$225	0.80	0.80	$180.00
12/14/2017	Wash DPPA Swapp	Assist with for Hearing on MTD	$225	0.30	0.30	$67.50
01/08/2018	Wash DPPA Swapp	Reviewing scheduling conference order	$235	0.30	0.30	$70.50
01/18/2018	Wash DPPA Swapp	Call with Joe Barton and Tom Kirchofer RE discovery requests	$235	0.30	0.30	$70.50
01/18/2018	Wash DPPA Swapp	Editing Joint Status Report	$235	0.30	0.30	$70.50
01/18/2018	Wash DPPA Swapp	Editing Ps First RFP	$235	0.30	0.30	$70.50
01/18/2018	Wash DPPA Swapp	Reviewing Defs' admissions in Answer to Complaint	$235	1.00	1.00	$235.00
01/18/2018	Wash DPPA Swapp	Drafting Ps 1st RFA	$235	2.00	2.00	$470.00
01/19/2018	Wash DPPA Swapp	Editing Ps 1st RFP	$235	0.50	0.50	$117.50
01/19/2018	Wash DPPA Swapp	Drafting Ps 1st RFA	$235	0.50	0.50	$117.50
01/22/2018	Wash DPPA Swapp	Editing Stip RE Rule 12f	$235	0.30	0.30	$70.50
01/31/2018	Wash DPPA Swapp	Editing Pls Initial Disclosures	$235	0.50	0.50	$117.50
01/31/2018	Wash DPPA Swapp	Editing format of Pls RFA	$235	0.20	0.20	$47.00
01/31/2018	Wash DPPA Swapp	Finalizing and filing Joint Status Certificate	$235	0.30	0.30	$70.50
02/01/2018	Wash DPPA Swapp	Editing Ps Initial Disclosures	$235	0.50	0.50	$117.50
02/02/2018	Wash DPPA Swapp	Editing Pls First RFP and RFA	$235	0.30	0.30	$70.50
02/02/2018	Wash DPPA Swapp	Managing case files regarding Answer to the Complaint	$235	0.30	0.30	$70.50
02/06/2018	Wash DPPA Swapp	Editing Ps First Set of Interrogatories	$235	0.80	0.80	$188.00
02/07/2018	Wash DPPA Swapp	Editing 1st set of Rogs	$235	0.30	0.30	$70.50
02/12/2018	Wash DPPA Swapp	Cite checking motion to strike	$235	0.30	0.30	$70.50
02/12/2018	Wash DPPA Swapp	Cite checking and editing motion to strike	$235	2.00	2.00	$470.00
02/12/2018	Wash DPPA Swapp	Editing 1st Set of Interrogatories	$235	0.20	0.20	$47.00

02/12/2018	Wash DPPA Swapp	Finalizing and serving Pls First Set of Interrogatories	$235	0.40	0.40	$94.00
02/13/2018	Wash DPPA Swapp	Editing the motion to strike	$235	1.50	1.50	$352.50
02/15/2018	Wash DPPA Swapp	Editing Stipulation/Protective Order	$235	0.50	0.50	$117.50
02/15/2018	Wash DPPA Swapp	Review and analyze jury trial scheduling order	$235	0.80	0.80	$188.00
02/23/2018	Wash DPPA Swapp	Manage case files regarding jury trial scheduling order	$235	0.30	0.30	$70.50
02/27/2018	Wash DPPA Swapp	Conference Call with Tom Kirchofer and Kathleen Britt	$235	0.70	0.70	$164.50
02/27/2018	Wash DPPA Swapp	Drafting notes from conference call with Kathleen Britt	$235	0.50	0.50	$117.50
03/06/2018	Wash DPPA Swapp	Cite checking and editing Reply ISO Motion to Strike	$235	1.50	1.50	$352.50
03/06/2018	Wash DPPA Swapp	Cite checking and editing Reply ISO Motion to Strike	$235	1.00	1.00	$235.00
03/06/2018	Wash DPPA Swapp	Editing Reply ISO Motion to Strike	$235	0.80	0.80	$188.00
03/06/2018	Wash DPPA Swapp	Drafting Declaration of Thomas Kirchofer RE Reply ISO Motion to Strike and preparing Exhibit A	$235	0.50	0.50	$117.50
03/06/2018	Wash DPPA Swapp	Editing Reply ISO Motion to Strike	$235	0.30	0.30	$70.50
03/06/2018	Wash DPPA Swapp	Correspondence with Tom Kirchofer RE final Reply ISO Motion to Strike brief, declaration and exhibit	$235	0.30	0.30	$70.50
03/06/2018	Wash DPPA Swapp	Finalizing Reply ISO Motion to Strike brief, Kirchofer declaration and exhibit and circulating to Tom Jarrard	$235	0.30	0.30	$70.50
03/07/2018	Wash DPPA Swapp	Finalizing and serving Plaintiffs 2nd set of RFA and preparing hardcopy	$235	0.50	0.50	$117.50
03/07/2018	Wash DPPA Swapp	Managing formal discovery files regarding Parties' Initial Disclosures	$235	0.20	0.20	$47.00
03/08/2018	Wash DPPA Swapp	Finalizing Letter RE Initial Disclosures and serving on Defs	$235	0.30	0.30	$70.50
03/09/2018	Wash DPPA Swapp	Preparing Plaintiff's responses to Defs 1st Rogs and RFP	$235	0.50	0.50	$117.50
03/15/2018	Wash DPPA Swapp	Reviewing Jade Wilcox documents	$235	1.30	1.30	$305.50
03/16/2018	Wash DPPA Swapp	Manage data from client re: Jade Wilcox's brochure from Swapp Law	$235	0.20	0.20	$47.00
03/16/2018	Wash DPPA Swapp	Reviewing protective order	$235	0.30	0.30	$70.50
03/19/2018	Wash DPPA Swapp	Manage data re: Plaintiff's Initial Disclosures production	$235	0.50	0.50	$117.50
03/19/2018	Wash DPPA Swapp	Manage case files regarding class cert briefing order	$235	0.30	0.30	$70.50
03/19/2018	Wash DPPA Swapp	Manage data re: Plaintiff's Initial Disclosures production	$235	1.00	1.00	$235.00
03/19/2018	Wash DPPA Swapp	Manage data re: Jade Wilcox documents	$235	0.30	0.30	$70.50
03/19/2018	Wash DPPA Swapp	Manage data re: Plaintiff's initial document production	$235	0.30	0.30	$70.50
03/19/2018	Wash DPPA Swapp	Serving Plaintiff's production pursuant to Initial Disclosures	$235	0.30	0.30	$70.50
03/20/2018	Wash DPPA Swapp	Conference call with Jade Wilcox	$235	0.80	0.80	$188.00
03/22/2018	Wash DPPA Swapp	Manage case files regarding stipulated protective order	$235	0.30	0.30	$70.50
03/22/2018	Wash DPPA Swapp	Drafting notes from conference call with client on 03-20-2018	$235	0.50	0.50	$117.50
03/23/2018	Wash DPPA Swapp	Call with Joe Barton and Tom Kirchofer RE productions	$235	0.40	0.40	$94.00
04/13/2018	Wash DPPA Swapp	Correspondence with Tom Kirchofer RE Swapp Dropbox docs	$235	0.30	0.30	$70.50
04/20/2018	Wash DPPA Swapp	Reviewing Wilcox v. Batiste documents	$235	2.30	2.30	$540.50
04/24/2018	Wash DPPA Swapp	Reviewing Wilcox v. Batiste Defendants' productions	$235	1.80	1.80	$423.00
04/25/2018	Wash DPPA Swapp	Reviewing Wilcox v. Batiste Defendants' productions	$235	1.00	1.00	$235.00
04/27/2018	Wash DPPA Swapp	Call with Tom Kirchofer re: next plaintiff's production	$235	0.20	0.20	$47.00
04/30/2018	Wash DPPA Swapp	Reviewing Wilcox v. Batiste Defendants' productions	$235	0.50	0.50	$117.50

04/30/2018	Wash DPPA Swapp	Call with Tom Kirchofer RE Wilcox v. Batiste document productions	$235	0.30	0.30	$70.50
04/30/2018	Wash DPPA Swapp	Manage data re: Plaintiff's production	$235	0.40	0.40	$94.00
04/30/2018	Wash DPPA Swapp	Manage data re: Wilcox v. Batiste Plaintiff's productions	$235	0.50	0.50	$117.50
04/30/2018	Wash DPPA Swapp	Reviewing Wilcox v. Batiste Defendant's document productions	$235	1.00	1.00	$235.00
05/01/2018	Wash DPPA Swapp	Reviewing Wilcox v. Batiste Defendants' Production	$235	2.50	2.50	$587.50
05/01/2018	Wash DPPA Swapp	Reviewing Batiste Plaintiffs docs	$235	0.80	0.80	$188.00
05/01/2018	Wash DPPA Swapp	Drafting and sending letter from Tom Kirchofer to Barbara Duffy re: discovery	$235	0.30	0.30	$70.50
05/01/2018	Wash DPPA Swapp	Reviewing Wilcox v. Batiste Plaintiff's productions	$235	0.90	0.90	$211.50
05/01/2018	Wash DPPA Swapp	Manage data re: Pls production of Wilcox v. Batiste Defendants' productions	$235	2.00	2.00	$470.00
05/02/2018	Wash DPPA Swapp	Manage data re: Pls production of Wilcox v. Batiste Defendants' productions	$235	0.30	0.30	$70.50
05/02/2018	Wash DPPA Swapp	Preparing Batiste Plaintiffs Discovery documents for production	$235	0.20	0.20	$47.00
05/02/2018	Wash DPPA Swapp	Manage formal discovery files regarding Defendants' Responses to First Set of Interrogatories	$235	0.50	0.50	$117.50
05/02/2018	Wash DPPA Swapp	Discuss plaintiff's production of documents with Tom Kirchofer	$235	0.20	0.20	$47.00
05/02/2018	Wash DPPA Swapp	Manage data re: Plaintiff's production of documents	$235	0.20	0.20	$47.00
05/02/2018	Wash DPPA Swapp	Call with Tom Kirchofer and Joe Barton RE discovery	$235	0.80	0.80	$188.00
05/02/2018	Wash DPPA Swapp	Reviewing Defendants' production of documents	$235	0.50	0.50	$117.50
05/03/2018	Wash DPPA Swapp	Manage data re: confidential documents	$235	0.50	0.50	$117.50
05/03/2018	Wash DPPA Swapp	Finalizing letter re: settlement demand	$235	0.20	0.20	$47.00
05/03/2018	Wash DPPA Swapp	Manage data re: client documents from Sweetser Law	$235	1.00	1.00	$235.00
05/03/2018	Wash DPPA Swapp	Manage data re: client documents from Sweetser Law	$235	0.30	0.30	$70.50
05/03/2018	Wash DPPA Swapp	Manage data re: client documents from Sweetser Law	$235	1.30	1.30	$305.50
05/04/2018	Wash DPPA Swapp	Call with Kizzie Johnson RE Wilcox v. Batiste document productions	$235	0.20	0.20	$47.00
05/07/2018	Wash DPPA Swapp	Manage data re: additional Plaintiff's production	$235	0.20	0.20	$47.00
05/07/2018	Wash DPPA Swapp	Manage data re: additional Plaintiff's production	$235	0.20	0.20	$47.00
05/07/2018	Wash DPPA Swapp	Manage data re: additional Plaintiff's production	$235	0.50	0.50	$117.50
05/10/2018	Wash DPPA Swapp	Manage case files re: Amended Complaint and Answer to Amended Complaint	$235	0.40	0.40	$94.00
05/10/2018	Wash DPPA Swapp	Finalizing and serving the Notice of Subpoena and subpoena to the Washington State Patrol	$235	0.40	0.40	$94.00
05/10/2018	Wash DPPA Swapp	Manage data re: Defendants' production	$235	0.30	0.30	$70.50
05/14/2018	Wash DPPA Swapp	Manage data re: Wilcox Insurance documents	$235	0.30	0.30	$70.50
05/14/2018	Wash DPPA Swapp	Drafting Proposed Order RE Class Cert Brief Schedule	$235	0.30	0.30	$70.50
05/14/2018	Wash DPPA Swapp	Manage data re: Wilcox Insurance Declaration	$235	0.30	0.30	$70.50
05/14/2018	Wash DPPA Swapp	Manage data re: Defendants' productions	$235	1.80	1.80	$423.00
05/15/2018	Wash DPPA Swapp	Manage data re: Defendants' productions	$235	0.30	0.30	$70.50
05/15/2018	Wash DPPA Swapp	Manage data re: Defendants' productions	$235	0.80	0.80	$188.00
05/15/2018	Wash DPPA Swapp	Correspondence with Tom Kirchofer RE documents from Sweetser Law Firm	$235	0.20	0.20	$47.00
05/15/2018	Wash DPPA Swapp	Call with Tom Kirchofer RE WSP powerpoints	$235	0.10	0.10	$23.50
05/15/2018	Wash DPPA Swapp	Manage data re: Defendants' productions	$235	0.20	0.20	$47.00
05/16/2018	Wash DPPA Swapp	Manage case files re: Order granting extension of time RE class cert briefing	$235	0.30	0.30	$70.50

05/22/2018	Wash DPPA Swapp	Manage case files re: non-party subpoenas	$235	0.20	0.20	$47.00
05/23/2018	Wash DPPA Swapp	Editing Motion to Compel and Barton Declaration	$235	0.50	0.50	$117.50
05/24/2018	Wash DPPA Swapp	Finalizing, emailing and preparing hardcopy of Letter from Thomas Kirchofer dated 5-24-2018	$235	0.40	0.40	$94.00
05/24/2018	Wash DPPA Swapp	Call with Tom Kirchofer RE reviewing Swapp production	$235	0.20	0.20	$47.00
05/25/2018	Wash DPPA Swapp	Reviewing Defendants' production	$235	1.40	1.40	$329.00
05/25/2018	Wash DPPA Swapp	Reviewing Defendants' production	$235	0.30	0.30	$70.50
05/25/2018	Wash DPPA Swapp	Manage data and reviewing WSP subpoena docs	$235	0.30	0.30	$70.50
05/30/2018	Wash DPPA Swapp	Reviewing WSP production of docments	$235	0.20	0.20	$47.00
05/30/2018	Wash DPPA Swapp	Manage data re: Wilcox license	$235	0.20	0.20	$47.00
06/04/2018	Wash DPPA Swapp	Preparing subpoenas and notices to Wash Police Dept and Wash Dept of Licensing	$235	1.00	1.00	$235.00
06/04/2018	Wash DPPA Swapp	Preparing subpoenas and notices to Wash Police Dept and Wash Dept of Licensing	$235	0.60	0.60	$141.00
06/04/2018	Wash DPPA Swapp	Preparing subpoenas and notices to Wash Police Dept and Wash Dept of Licensing	$235	0.30	0.30	$70.50
06/04/2018	Wash DPPA Swapp	Call with WA Dept of Licensing RE main address	$235	0.40	0.40	$94.00
06/04/2018	Wash DPPA Swapp	Finalizing and preparing hardcopy mailing of the Notices and Subpoenas to Produce to WA Dept of Licensing and Spokane Police Dept	$235	0.50	0.50	$117.50
06/04/2018	Wash DPPA Swapp	Correspondence with process server re: routine service in Olympia, WA and Spokane, WA	$235	0.40	0.40	$94.00
06/05/2018	Wash DPPA Swapp	Call with Kizzie Johnson at Sweester Law re: Wilcox documents	$235	0.20	0.20	$47.00
06/05/2018	Wash DPPA Swapp	Managing data re: Pls Initial Disclosures production	$235	0.30	0.30	$70.50
06/05/2018	Wash DPPA Swapp	Reviewing Swapp production	$235	1.10	1.10	$258.50
06/06/2018	Wash DPPA Swapp	Reviewing Defendants' production of class data	$235	0.50	0.50	$117.50
06/06/2018	Wash DPPA Swapp	Preparing subpoena and notice to Washington State CJTC	$235	0.60	0.60	$141.00
06/06/2018	Wash DPPA Swapp	Reviewing Defs production	$235	0.80	0.80	$188.00
06/07/2018	Wash DPPA Swapp	Reviewing Defs production	$235	1.30	1.30	$305.50
06/08/2018	Wash DPPA Swapp	Managing formal discovery files re: Defendants' Responses to Requests for Admissions and Requests for Production	$235	0.50	0.50	$117.50
06/08/2018	Wash DPPA Swapp	Reviewing Swapp production	$235	1.50	1.50	$352.50
06/08/2018	Wash DPPA Swapp	Preparing Notice and subpoena to WSP RE Rule 30(b)(6) Depo	$235	0.50	0.50	$117.50
06/08/2018	Wash DPPA Swapp	Reviewing Defs production	$235	1.00	1.00	$235.00
06/11/2018	Wash DPPA Swapp	Manage case files re: affidavit of service of subpoena to Dept of Licensing	$235	0.10	0.10	$23.50
06/11/2018	Wash DPPA Swapp	Finalizing Notice of Depo and Subpoena to WSP	$235	1.00	1.00	$235.00
06/11/2018	Wash DPPA Swapp	Finalizing Notice of Depo and Subpoena to WSP	$235	0.30	0.30	$70.50
06/12/2018	Wash DPPA Swapp	Correspondence with process server RE WSP 30(b)(6) Deposition Subpoena	$235	0.20	0.20	$47.00
06/12/2018	Wash DPPA Swapp	Manage data re: Defendants' production	$235	0.40	0.40	$94.00
06/12/2018	Wash DPPA Swapp	Call with process server RE WSP deposition subpoena	$235	0.20	0.20	$47.00
06/12/2018	Wash DPPA Swapp	Correspondence with court reporters RE RFP/price quote	$235	0.30	0.30	$70.50
06/12/2018	Wash DPPA Swapp	Manage data re: Defendants' production	$235	0.30	0.30	$70.50
06/12/2018	Wash DPPA Swapp	Editing notice of subpoena and subpoena to CJTC	$235	0.40	0.40	$94.00
06/13/2018	Wash DPPA Swapp	Finalizing Notice and Subpoena to CJTC	$235	0.50	0.50	$117.50

06/13/2018	Wash DPPA Swapp	Review/analyze issues re: court reporter	$235	0.30	0.30	$70.50
06/13/2018	Wash DPPA Swapp	Correspondence with Veritext, US Legal and Esquire re: court reporter issues	$235	0.40	0.40	$94.00
06/13/2018	Wash DPPA Swapp	Call with Seth Weissman at US Legal RE court reporter issues	$235	0.30	0.30	$70.50
06/13/2018	Wash DPPA Swapp	Call with Randy Stein with Veritext RE court reporter issues	$235	0.30	0.30	$70.50
06/13/2018	Wash DPPA Swapp	Call with Jason Solomon with Esquire RE court reporter price issues	$235	0.30	0.30	$70.50
06/13/2018	Wash DPPA Swapp	Assisting with preparing for deposition of Washington State Patrol	$235	0.90	0.90	$211.50
06/13/2018	Wash DPPA Swapp	Correspondence with Veritext, US Legal and Esquire	$235	0.40	0.40	$94.00
06/14/2018	Wash DPPA Swapp	Assisting with preparing for deposition of Washington State Patrol	$235	0.50	0.50	$117.50
06/14/2018	Wash DPPA Swapp	Assisting with preparing for deposition of Washington State Patrol	$235	1.00	1.00	$235.00
06/14/2018	Wash DPPA Swapp	Assisting with preparing for deposition of Washington State Patrol	$235	1.00	1.00	$235.00
06/14/2018	Wash DPPA Swapp	Manage data re: Wilcox v. Batiste document productions	$235	1.00	1.00	$235.00
06/14/2018	Wash DPPA Swapp	Manage data re: Wilcox v. Batiste document productions	$235	0.50	0.50	$117.50
06/15/2018	Wash DPPA Swapp	Manage data re: WSP document productions	$235	2.00	2.00	$470.00
06/15/2018	Wash DPPA Swapp	Assisting with preparing for deposition of Jade Wilcox	$235	0.50	0.50	$117.50
06/15/2018	Wash DPPA Swapp	Manage data re: WSP document production	$235	1.00	1.00	$235.00
06/18/2018	Wash DPPA Swapp	Manage data re: Wilcox v. Batiste productions	$235	1.50	1.50	$352.50
06/19/2018	Wash DPPA Swapp	Looking for Wilcox Initial Disclosures in Batiste and sending to Tom K	$235	0.30	0.30	$70.50
06/20/2018	Wash DPPA Swapp	Review rough transcript of Rule 30(b)(6) deposition of WSP	$235	0.60	0.60	$141.00
06/20/2018	Wash DPPA Swapp	Correspondence with Randy Strein at Veritext RE setting up case delivery for depositions	$235	0.30	0.30	$70.50
06/20/2018	Wash DPPA Swapp	Reviewing technical issue with bates stamped Plaintiff 10234 document	$235	0.30	0.30	$70.50
06/20/2018	Wash DPPA Swapp	Depo prep for Jade Wilcox deposition	$235	0.50	0.50	$117.50
06/25/2018	Wash DPPA Swapp	Requesting court reporter for continued WSP 30(b)(6) deposition	$235	0.20	0.20	$47.00
06/27/2018	Wash DPPA Swapp	Proofing and cite checking Reply ISO Motion to Compel Interrogatory responses	$235	1.50	1.50	$352.50
06/27/2018	Wash DPPA Swapp	Finalizing filing of Reply ISO Motion to Compel Interrogatory Responses	$235	0.30	0.30	$70.50
06/27/2018	Wash DPPA Swapp	Filing Reply ISO Motion to Compel Interrogatory Responses	$235	0.30	0.30	$70.50
06/27/2018	Wash DPPA Swapp	Manage data re: Spokane Police production, CJTC production and Wilcox v. Batiste production	$235	0.50	0.50	$117.50
06/28/2018	Wash DPPA Swapp	Finalizing and serving letter from Tom Kirchofer to Barbara D RE Interrogatory Responses	$235	0.30	0.30	$70.50
06/28/2018	Wash DPPA Swapp	Serving hardcopy of letter from Tom Kirchofer to Barbara D RE Interrogatory Responses	$235	0.30	0.30	$70.50
06/28/2018	Wash DPPA Swapp	Correspondence with Tom Kirchofer RE Wilcox v. Batiste productions	$235	0.30	0.30	$70.50
06/28/2018	Wash DPPA Swapp	Manage data re: Spokane Police Dept confidential documents	$235	0.40	0.40	$94.00
06/28/2018	Wash DPPA Swapp	Manage data re: Plaintiff's production, Spokane Police Dept production and CJTC production	$235	0.30	0.30	$70.50
06/29/2018	Wash DPPA Swapp	Assisting with preparing for 30(b)(6) deposition of WSP	$235	1.00	1.00	$235.00
06/29/2018	Wash DPPA Swapp	Manage data re: class data	$235	0.50	0.50	$117.50
07/03/2018	Wash DPPA Swapp	Finalizing and serving letter to B. Duffy RE Unilateral redaction of documents and letter to S. Williams RE Topics 13 & 14 of WSP Rule 30(b)(6)	$235	0.30	0.30	$70.50

07/10/2018	Wash DPPA Swapp	Manage case files re: 2nd Motion to Compel	$235	0.20	0.20	$47.00
07/10/2018	Wash DPPA Swapp	Drafting notice and subpoena to CJTC RE 30(b)(6) depo	$235	0.50	0.50	$117.50
07/10/2018	Wash DPPA Swapp	Editing notice and subpoena for CJTC 30(b)(6) depo	$235	0.20	0.20	$47.00
07/10/2018	Wash DPPA Swapp	Drafting notice and subpoena for SPD 30(b)(6) depo	$235	0.50	0.50	$117.50
07/11/2018	Wash DPPA Swapp	Finalizing and serving the notices of deposition and subpoenas to CJTC and SPD	$235	1.00	1.00	$235.00
07/11/2018	Wash DPPA Swapp	Correspondence with process server re: routine service to CJTC and SPD	$235	0.30	0.30	$70.50
07/12/2018	Wash DPPA Swapp	Drafting notice and subpoena of 30(b)(6) depo to Department of Licensing	$235	0.50	0.50	$117.50
07/12/2018	Wash DPPA Swapp	Manage data re: Dept of Licensing document production	$235	0.50	0.50	$117.50
07/13/2018	Wash DPPA Swapp	Finalizing and serving Notice and Subpoena of 30(b)(6) depo - Dept of Licensing	$235	1.00	1.00	$235.00
07/17/2018	Wash DPPA Swapp	Manage data re: Defendants' reproduction of documents	$235	0.30	0.30	$70.50
07/17/2018	Wash DPPA Swapp	Correspondence with process server RE routine service to CJTC	$235	0.10	0.10	$23.50
07/17/2018	Wash DPPA Swapp	Email correspondence with court reporter RE Candee and Johnson depositions	$235	0.10	0.10	$23.50
07/17/2018	Wash DPPA Swapp	Manage data re: Defendants' productions	$235	0.30	0.30	$70.50
07/18/2018	Wash DPPA Swapp	Following up with court reporter RE service to CJTC	$235	0.20	0.20	$47.00
07/18/2018	Wash DPPA Swapp	Correspondence with Vertext re: scheduling court reporter for CJTC deposition	$235	0.20	0.20	$47.00
07/18/2018	Wash DPPA Swapp	Correspondence with Veritext re: scheduling court reporter for DOL deposition	$235	0.20	0.20	$47.00
07/18/2018	Wash DPPA Swapp	Correspondence with Veritext re: scheduling Spokane Police Dept deposition	$235	0.20	0.20	$47.00
07/18/2018	Wash DPPA Swapp	Manage data re: Defendants' production of unredacted documents	$235	0.30	0.30	$70.50
07/18/2018	Wash DPPA Swapp	Manage formal discovery files re: Defendants' Responses to Interrogatories No. 3 & 4	$235	0.80	0.80	$188.00
07/19/2018	Wash DPPA Swapp	Assisting with preparing for depositions of CJTC and Dept of Licensing	$235	1.40	1.40	$329.00
07/19/2018	Wash DPPA Swapp	Discuss Affidavits ISO Class Cert with Joe and Tom and sending Tom samples	$235	0.20	0.20	$47.00
07/20/2018	Wash DPPA Swapp	Manage deposition files re: Rule 30(b)(6) depositions of witnesses Candee and Johnson	$235	0.30	0.30	$70.50
07/20/2018	Wash DPPA Swapp	Assisting with preparing for depositions of CJTC and Dept of Licensing	$235	1.30	1.30	$305.50
07/20/2018	Wash DPPA Swapp	Assisting with preparing for depositions of CJTC and Dept of Licensing	$235	1.80	1.80	$423.00
07/23/2018	Wash DPPA Swapp	Manage data re: Dept of Licensing production	$235	0.30	0.30	$70.50
07/23/2018	Wash DPPA Swapp	Manage data re: Dept of Licensing production	$235	0.30	0.30	$70.50
07/24/2018	Wash DPPA Swapp	Assisting with preparing for depositions of CJTC and Dept of Licensing	$235	2.00	2.00	$470.00
07/25/2018	Wash DPPA Swapp	Assisting with preparing for depositions of CJTC and Dept of Licensing	$235	1.00	1.00	$235.00
07/26/2018	Wash DPPA Swapp	Assisting with preparing for depositions of CJTC and Dept of Licensing	$235	0.70	0.70	$164.50
07/26/2018	Wash DPPA Swapp	Manage data re: Wilcox v. Batiste productions	$235	0.40	0.40	$94.00
07/27/2018	Wash DPPA Swapp	Manage deposition files re: Rule 30(b)(6) depositions of witnesses Candee and Johnson	$235	0.30	0.30	$70.50
07/31/2018	Wash DPPA Swapp	Preparing exhibit to 2nd supplemental response ISO Motion to Compel	$235	0.30	0.30	$70.50
07/31/2018	Wash DPPA Swapp	Reviewing Wilcox v. Batiste discovery productions	$235	0.50	0.50	$117.50
07/31/2018	Wash DPPA Swapp	Manage data re: Wilcox v. Batiste productions	$235	1.00	1.00	$235.00
07/31/2018	Wash DPPA Swapp	Manage data re: Wilcox v. Batiste productions	$235	0.30	0.30	$70.50
08/01/2018	Wash DPPA Swapp	Manage data re: Washington State Patrol SECTOR Source	$235	0.40	0.40	$94.00
08/02/2018	Wash DPPA Swapp	Drafting Index of Exhibits for Class Cert	$235	1.00	1.00	$235.00

08/02/2018	Wash DPPA Swapp	Preparing class cert exhibits	$235	0.50	0.50	$117.50
08/03/2018	Wash DPPA Swapp	Preparing class cert exhibits	$235	2.50	2.50	$587.50
08/06/2018	Wash DPPA Swapp	Editing Class Cert brief	$235	0.90	0.90	$211.50
08/06/2018	Wash DPPA Swapp	Discuss Class Cert brief and exhibits with Tom Kirchofer	$235	0.20	0.20	$47.00
08/06/2018	Wash DPPA Swapp	Editing class cert exhibits and index of exhibits	$235	0.50	0.50	$117.50
08/06/2018	Wash DPPA Swapp	Discuss Class Cert brief with Joe Barton	$235	0.20	0.20	$47.00
08/06/2018	Wash DPPA Swapp	Editing and cite checking class cert brief	$235	1.40	1.40	$329.00
08/06/2018	Wash DPPA Swapp	Preparing Tom Kirchofer Declaration ISO Class Cert	$235	0.80	0.80	$188.00
08/06/2018	Wash DPPA Swapp	Cite checking class cert brief	$235	1.80	1.80	$423.00
08/06/2018	Wash DPPA Swapp	Editing class cert brief, index of exhibits and Kirchofer declaration	$235	1.00	1.00	$235.00
08/06/2018	Wash DPPA Swapp	Editing class cert brief	$235	1.00	1.00	$235.00
08/07/2018	Wash DPPA Swapp	Editing and finalizing class cert brief	$235	1.00	1.00	$235.00
08/07/2018	Wash DPPA Swapp	Finalizing class cert exhibits	$235	0.80	0.80	$188.00
08/07/2018	Wash DPPA Swapp	Cite checking and finalizing motion to amend	$235	1.00	1.00	$235.00
08/14/2018	Wash DPPA Swapp	Reviewing Batiste discovery responses	$235	0.50	0.50	$117.50
08/23/2018	Wash DPPA Swapp	Discussing case with Matt Smith	$235	0.30	0.30	$70.50
08/23/2018	Wash DPPA Swapp	Discussing case with Matt Smith	$235	0.80	0.80	$188.00
08/28/2018	Wash DPPA Swapp	circulating Swapp docs to Kizzie Johnson	$235	0.50	0.50	$117.50
08/28/2018	Wash DPPA Swapp	Call with Thomas Jarrard RE class cert exhibits	$235	0.30	0.30	$70.50
08/29/2018	Wash DPPA Swapp	Reviewing Defs unredacted "quick peek" docs	$235	1.00	1.00	$235.00
09/04/2018	Wash DPPA Swapp	Manage data re: Defendants productions	$235	1.00	1.00	$235.00
09/06/2018	Wash DPPA Swapp	Manage data re: Defendants' Disclosures	$235	0.30	0.30	$70.50
09/14/2018	Wash DPPA Swapp	Researching former Swapp employees identified on Ds disclosures	$235	1.50	1.50	$352.50
09/17/2018	Wash DPPA Swapp	Drafting Opp to MTD Amended Complaint	$235	0.30	0.30	$70.50
09/19/2018	Wash DPPA Swapp	Review Stipulation RE quick peek docs	$235	0.50	0.50	$117.50
09/20/2018	Wash DPPA Swapp	Preparing charts re: MTD Complaint and MTD Amended Complaint	$235	1.40	1.40	$329.00
09/21/2018	Wash DPPA Swapp	Preparing chart of Swapp employees identified on Ds disclosures	$235	0.70	0.70	$164.50
09/26/2018	Wash DPPA Swapp	Manage case files re: Motion for Protective Order	$235	0.30	0.30	$70.50
09/26/2018	Wash DPPA Swapp	Manage case files re: Defs Opp to Class Cert	$235	0.50	0.50	$117.50
09/26/2018	Wash DPPA Swapp	Assisting with preparation for class cert hearing	$235	1.00	1.00	$235.00
09/27/2018	Wash DPPA Swapp	Assisting with preparation for class cert hearing	$235	1.00	1.00	$235.00
09/27/2018	Wash DPPA Swapp	Assisting with preparation for motion to dismiss amended complaint hearing	$235	0.30	0.30	$70.50
09/27/2018	Wash DPPA Swapp	Reviewing 2nd Supplemental Disclosures	$235	0.30	0.30	$70.50
09/28/2018	Wash DPPA Swapp	Preparing chart of MTD Amended Complaint cases	$235	0.60	0.60	$141.00
09/28/2018	Wash DPPA Swapp	Preparing chart of MTD Amended Complaint cases by argument	$235	2.20	2.20	$517.00
10/02/2018	Wash DPPA Swapp	Cite checking MTD Amended Complaint Opposition	$235	2.50	2.50	$587.50
10/02/2018	Wash DPPA Swapp	Cite checking MTD Amended Complaint Opp	$235	3.00	3.00	$705.00
10/03/2018	Wash DPPA Swapp	Editing MTD Amended Complaint Opp	$235	0.50	0.50	$117.50
10/03/2018	Wash DPPA Swapp	Editing MTD Amended Complaint Opp	$235	0.30	0.30	$70.50
10/03/2018	Wash DPPA Swapp	Editing MTD Amended Complaint Opp	$235	0.50	0.50	$117.50

10/03/2018	Wash DPPA Swapp	Editing MTD Amended Complaint Opp	$235	0.30	0.30	$70.50
10/05/2018	Wash DPPA Swapp	Correspondence with Colin Downes re SECTOR Source	$235	0.30	0.30	$70.50
10/09/2018	Wash DPPA Swapp	Correspondence with Colin Downes re SECTOR Source	$235	0.30	0.30	$70.50
10/11/2018	Wash DPPA Swapp	Updating Former Swapp Employee Witness list	$235	0.50	0.50	$117.50
10/11/2018	Wash DPPA Swapp	Researching contact info for former Swapp employees	$235	2.00	2.00	$470.00
10/30/2018	Wash DPPA Swapp	Cite checking and editing Class Cert Reply Brief	$235	5.00	5.00	$1,175.00
10/31/2018	Wash DPPA Swapp	Cite checking and editing Class Cert Reply Brief	$235	2.00	2.00	$470.00
10/31/2018	Wash DPPA Swapp	Cite checking and editing Class Cert Reply Brief	$235	4.30	4.30	$1,010.50
11/07/2018	Wash DPPA Swapp	Assisting with preparing for motion to dismiss amended complaint hearing	$235	1.00	1.00	$235.00
11/07/2018	Wash DPPA Swapp	Assisting with preparing for motion to dismiss amended complaint hearing	$235	0.70	0.70	$164.50
11/08/2018	Wash DPPA Swapp	Assisting with preparing for motion to dismiss amended complaint hearing	$235	4.00	4.00	$940.00
11/09/2018	Wash DPPA Swapp	Assisting with preparing for motion to dismiss amended complaint hearing	$235	1.00	1.00	$235.00
11/15/2018	Wash DPPA Swapp	Assisting with preparing for motion to dismiss amended complaint hearing	$235	1.00	1.00	$235.00
11/21/2018	Wash DPPA Swapp	Assisting with preparing for class cert hearing	$235	0.50	0.50	$117.50
11/28/2018	Wash DPPA Swapp	Assisting with preparing for class cert hearing	$235	0.80	0.80	$188.00
11/29/2018	Wash DPPA Swapp	Assisting with preparing for class cert hearing	$235	2.50	2.50	$587.50
11/29/2018	Wash DPPA Swapp	Assisting with preparing for class cert hearing	$235	4.00	4.00	$940.00
11/30/2018	Wash DPPA Swapp	Assisting with preparing for class cert hearing	$235	4.00	4.00	$940.00
11/30/2018	Wash DPPA Swapp	Assisting with preparing for class cert hearing	$235	1.00	1.00	$235.00
11/30/2018	Wash DPPA Swapp	Assisting with preparing for class cert hearing	$235	1.00	1.00	$235.00
12/03/2018	Wash DPPA Swapp	Assisting with preparing for class cert hearing	$235	1.50	1.50	$352.50
01/28/2019	Wash DPPA Swapp	Reviewing Ds production of data re: police report purchases	$250	0.30	0.30	$75.00
01/28/2019	Wash DPPA Swapp	Reviewing Ds production of data re: police report purchases	$250	0.50	0.50	$125.00
01/29/2019	Wash DPPA Swapp	Manage data re: Defendants' production of police report purchases	$250	0.50	0.50	$125.00
02/01/2019	Wash DPPA Swapp	Drafting Request for Proposal re Notice Administrator	$250	0.50	0.50	$125.00
02/01/2019	Wash DPPA Swapp	Drafting Request for Proposal re Notice Administrator	$250	1.00	1.00	$250.00
02/01/2019	Wash DPPA Swapp	Drafting Request for Proposal for Notice Administrator	$250	1.50	1.50	$375.00
02/07/2019	Wash DPPA Swapp	Reviewing, finalizing and emailing the Request for Proposal for Notice Administrator	$250	0.80	0.80	$200.00
02/15/2019	Wash DPPA Swapp	Editing Request for Proposal for Notice Administrator bids	$250	0.30	0.30	$75.00
02/19/2019	Wash DPPA Swapp	Updating Potential Notice Administrator firms re Court stay	$250	0.20	0.20	$50.00
03/22/2019	Wash DPPA Swapp	Manage case files re: Class cert order	$250	0.30	0.30	$75.00
04/09/2019	Wash DPPA Swapp	Manage data re: Defendants' financial information document production	$250	1.00	1.00	$250.00
05/17/2019	Wash DPPA Swapp	Assisting with mediation preparations	$250	0.80	0.80	$200.00
05/17/2019	Wash DPPA Swapp	Assisting with mediation preparations	$250	1.00	1.00	$250.00
05/17/2019	Wash DPPA Swapp	Assisting with mediation preparations	$250	1.00	1.00	$250.00
07/10/2019	Wash DPPA Swapp	Reading prior escrow agreements from American Airlines, Washington State Patrol and Wawa ESOP	$250	1.00	1.00	$250.00
07/11/2019	Wash DPPA Swapp	Editing settlement agreement formatting	$250	0.50	0.50	$125.00
07/16/2019	Wash DPPA Swapp	Drafting escrow agreement	$250	1.00	1.00	$250.00

07/25/2019	Wash DPPA Swapp	Call with Jess at Sweetser Law Office re Swapp settlement check	$250	0.30	0.30	$75.00
08/07/2019	Wash DPPA Swapp	Correspondence with Julia James re: Settlement Fund TIN	$250	0.30	0.30	$75.00
08/07/2019	Wash DPPA Swapp	Correspondence with Joe Barton and Julia James re Application for TIN for Settlement Fund	$250	0.30	0.30	$75.00
08/08/2019	Wash DPPA Swapp	Correspondence with EagleBank re Settlement Fund Escrow Account and Escrow Agreement	$250	0.30	0.30	$75.00
08/09/2019	Wash DPPA Swapp	Travel to EagleBank and to deposit Settlement Fund Escrow Account	$250	1.00	1.00	$250.00
08/22/2019	Wash DPPA Swapp	Preparing table of contents for settlement agreement	$250	0.50	0.50	$125.00
08/26/2019	Wash DPPA Swapp	Proofreading Settlement Agreement	$250	3.50	3.50	$875.00
08/26/2019	Wash DPPA Swapp	Preparing Settlement Certificate	$250	0.50	0.50	$125.00
09/23/2019	Wash DPPA Swapp	Preparing chart comparing settlement administrator bid proposals	$250	2.00	2.00	$500.00
09/24/2019	Wash DPPA Swapp	Preparing charts comparing settlement administrators bid proposal for with and without claims filing	$250	2.00	2.00	$500.00
09/24/2019	Wash DPPA Swapp	Preparing charts comparing settlement administrators bid proposal for with and without claims filing	$250	4.00	4.00	$1,000.00
09/25/2019	Wash DPPA Swapp	Preparing charts comparing settlement administrators bid proposal for with and without claims filing	$250	2.50	2.50	$625.00
10/02/2019	Wash DPPA Swapp	Editing chart of bid comparisons for settlement administrator	$250	1.00	1.00	$250.00
10/02/2019	Wash DPPA Swapp	Editing chart of bid comparisons for settlement administrator	$250	1.00	1.00	$250.00
10/03/2019	Wash DPPA Swapp	Editing chart of bid comparisons for settlement administrator	$250	1.50	1.50	$375.00
10/03/2019	Wash DPPA Swapp	Editing chart of bid comparisons for settlement administrator	$250	1.00	1.00	$250.00
10/11/2019	Wash DPPA Swapp	Cite checking Motion for preliminary approval	$250	1.40	1.40	$350.00
10/11/2019	Wash DPPA Swapp	Cite checking Motion for preliminary approval	$250	3.50	3.50	$875.00
10/25/2019	Wash DPPA Swapp	Cite checking and editing Motion for Preliminary Approval	$250	1.50	1.50	$375.00
10/25/2019	Wash DPPA Swapp	Editing Motion for Preliminary Approval	$250	1.00	1.00	$250.00
10/25/2019	Wash DPPA Swapp	Finalizing exhibits for Motion for Preliminary Approval	$250	1.00	1.00	$250.00
10/25/2019	Wash DPPA Swapp	Filing Motion for Preliminary Approval	$250	0.50	0.50	$125.00
10/28/2019	Wash DPPA Swapp	Correspondence with Natacha Pennaneach of Eagle Bank and Kathy Schulman of James King's office regarding the Settlement Fund wire instructions	$250	0.50	0.50	$125.00
11/15/2019	Wash DPPA Swapp	Assisting with preparing for preliminary approval hearing	$250	1.00	1.00	$250.00
01/02/2020	Wash DPPA Swapp	Drafting Letter to EagleBank re wire transfer to Angeion	$265	0.50	0.50	$132.50
02/18/2020	Wash DPPA Swapp	Review time records for Fee Petition	$265	1.00	1.00	$265.00
02/19/2020	Wash DPPA Swapp	Review time records for Fee Petition	$265	2.00	2.00	$530.00
02/20/2020	Wash DPPA Swapp	Review time records for fee petition	$265	2.50	2.50	$662.50
02/21/2020	Wash DPPA Swapp	Review time records for Fee Petition	$265	0.50	0.50	$132.50
02/21/2020	Wash DPPA Swapp	Review time records for Fee Petition	$265	1.00	1.00	$265.00
		Total Labor For Ming Siegel		**267.70**	**267.70**	**$63,535.00**

Thomas Kirchofer

07/11/2017	Wash DPPA Swapp	review complaint and TRO documents.	$600	1.80	1.80	$1,080.00

07/21/2017	Wash DPPA Swapp	read indiana decision; review statute.	$600	1.00	1.00	$600.00
07/21/2017	Wash DPPA Swapp	prep for and conduct call w/ washington counsel re: new complaint; meet w/ joe barton re: new complaint.	$600	1.50	1.50	$900.00
07/27/2017	Wash DPPA Swapp	review fee agreement and complaint .	$600	0.50	0.50	$300.00
07/31/2017	Wash DPPA Swapp	review and comment on complaint.	$600	2.00	2.00	$1,200.00
07/31/2017	Wash DPPA Swapp	draft class action complaint.	$600	3.60	3.60	$2,160.00
08/01/2017	Wash DPPA Swapp	draft complaint.	$600	5.70	5.70	$3,420.00
08/04/2017	Wash DPPA Swapp	edit draft complaint; email with washington counsel	$600	1.30	1.30	$780.00
08/07/2017	Wash DPPA Swapp	draft/edit complaint	$600	1.20	1.20	$720.00
08/08/2017	Wash DPPA Swapp	draft/edit complaint	$600	0.70	0.70	$420.00
08/14/2017	Wash DPPA Swapp	review Swapp's documents received from Washington counsel; check docket; review cases cited by Maracich.	$600	1.50	1.50	$900.00
08/15/2017	Wash DPPA Swapp	correspondence with washington counsel; review Swapp documents.	$600	0.90	0.90	$540.00
08/17/2017	Wash DPPA Swapp	draft/edit complaint	$600	0.70	0.70	$420.00
08/22/2017	Wash DPPA Swapp	check docket; attention to pro hac application	$600	0.50	0.50	$300.00
08/24/2017	Wash DPPA Swapp	review correspondence re: waiver of service	$600	0.20	0.20	$120.00
08/25/2017	Wash DPPA Swapp	attention to docs received in discovery; pro hac/ecf paperwork	$600	0.60	0.60	$360.00
08/25/2017	Wash DPPA Swapp	attention to motion for PHV and WSBA documents	$600	1.00	1.00	$600.00
09/28/2017	Wash DPPA Swapp	attention to class period; review multiple requestor spreadsheet; revision to draft parke gordon complaint.	$600	0.90	0.90	$540.00
10/20/2017	Wash DPPA Swapp	read defendant's motion to dismiss; research response; call with j. barton re: response;	$600	4.00	4.00	$2,400.00
10/23/2017	Wash DPPA Swapp	research re: opposition to motion to dismiss; call with co-counsel.	$600	7.80	7.80	$4,680.00
10/24/2017	Wash DPPA Swapp	research re opposition to MTD	$600	1.30	1.30	$780.00
10/24/2017	Wash DPPA Swapp	research/draft opposition to mtd.	$600	0.20	0.20	$120.00
10/24/2017	Wash DPPA Swapp	research and draft opposition to MTD.	$600	1.80	1.80	$1,080.00
10/25/2017	Wash DPPA Swapp	research and draft opposition to mtd.	$600	7.40	7.40	$4,440.00
10/26/2017	Wash DPPA Swapp	research/draft opposition to mtd.	$600	2.10	2.10	$1,260.00
10/26/2017	Wash DPPA Swapp	research/draft opposition to mtd.	$600	1.60	1.60	$960.00
10/26/2017	Wash DPPA Swapp	research and draft opposition to MTD	$600	2.10	2.10	$1,260.00
10/26/2017	Wash DPPA Swapp	research/draft opposition to motion to dismiss.	$600	0.60	0.60	$360.00
10/27/2017	Wash DPPA Swapp	research/draft opposition to motion to dismiss.	$600	5.30	5.30	$3,180.00
10/30/2017	Wash DPPA Swapp	opposition to mtd.	$600	8.80	8.80	$5,280.00
11/01/2017	Wash DPPA Swapp	edit/draft opposition to motion to dismiss.	$600	0.50	0.50	$300.00
11/02/2017	Wash DPPA Swapp	edits to opposition to MTD	$600	0.40	0.40	$240.00
11/03/2017	Wash DPPA Swapp	call with j. barton re: motion to dismiss opposition; edits to same.	$600	1.20	1.20	$720.00
11/06/2017	Wash DPPA Swapp	research and draft opposition to mtd; research and draft request for hearing on judicial notice.	$600	6.00	6.00	$3,600.00
11/08/2017	Wash DPPA Swapp	review filing in Batiste case; check docket in Batiste.	$600	0.40	0.40	$240.00

11/09/2017	Wash DPPA Swapp	research and draft opposition to request for judicial notice.	$600	9.80	9.80	$5,880.00
11/12/2017	Wash DPPA Swapp	edits to opposition to mtd,.	$600	1.30	1.30	$780.00
11/13/2017	Wash DPPA Swapp	attention to extrinsic documents opposition; review PI transcript.	$600	0.60	0.60	$360.00
11/13/2017	Wash DPPA Swapp	edits to opposition to MTD	$600	0.20	0.20	$120.00
11/13/2017	Wash DPPA Swapp	edits to opposition to MTD and Judicial Notice Opposition .	$600	1.30	1.30	$780.00
11/13/2017	Wash DPPA Swapp	call with joe barton re opposition to motion and re: case status.	$600	0.20	0.20	$120.00
11/15/2017	Wash DPPA Swapp	review various entries on Batiste docket.	$600	0.50	0.50	$300.00
11/27/2017	Wash DPPA Swapp	review reply brief in support of motion to dismiss.	$600	0.70	0.70	$420.00
12/18/2017	Wash DPPA Swapp	review pleadings on motion to dismiss	$600	0.80	0.80	$480.00
12/20/2017	Wash DPPA Swapp	call w/ joe barton re: mtd hearing	$600	0.40	0.40	$240.00
12/28/2017	Wash DPPA Swapp	review court's ruling on motion to amend in Batiste case.	$600	0.10	0.10	$60.00
01/05/2018	Wash DPPA Swapp	compare answer with complaint; phone call w/ T. Jarrard re: case status.	$615	0.90	0.90	$553.50
01/08/2018	Wash DPPA Swapp	draft discovery requests; research possible motion to strike affirmative defenses.	$615	5.00	5.00	$3,075.00
01/09/2018	Wash DPPA Swapp	emails w/ co-counsel re: case status	$615	0.50	0.50	$307.50
01/10/2018	Wash DPPA Swapp	attention to possible motion to strike; attention to joint status report.	$615	1.50	1.50	$922.50
01/11/2018	Wash DPPA Swapp	research and draft letter to opposing counsel re: motion to strike	$615	4.00	4.00	$2,460.00
01/16/2018	Wash DPPA Swapp	research, draft and edit letter to Swapp's counsel.	$615	2.00	2.00	$1,230.00
01/18/2018	Wash DPPA Swapp	call w/ Joe Barton re: discovery requests; edits to discovery requests.	$615	0.50	0.50	$307.50
01/19/2018	Wash DPPA Swapp	edits to document requests; draft requests for admission; email from opposing counsel re: motion to strike; call with joe barton re: discovery issues; emails with co-counsel re: discovery matters.	$615	6.00	6.00	$3,690.00
01/22/2018	Wash DPPA Swapp	draft stipulation re: amendment of answer	$615	2.00	2.00	$1,230.00
01/24/2018	Wash DPPA Swapp	review amended answer; research possible motion to strike.	$615	2.50	2.50	$1,537.50
01/25/2018	Wash DPPA Swapp	research and draft motion to strike	$615	3.00	3.00	$1,845.00
01/26/2018	Wash DPPA Swapp	research/draft motion to strike.	$615	2.50	2.50	$1,537.50
01/28/2018	Wash DPPA Swapp	research/draft motion to strike; draft initial disclosures; attention to collection of documents for possible production in discovery.	$615	4.00	4.00	$2,460.00
01/29/2018	Wash DPPA Swapp	draft initial disclosures and draft/edit motion to strike; attention to discovery requests.	$615	4.00	4.00	$2,460.00
01/31/2018	Wash DPPA Swapp	draft and edit discovery requests to Swapp.	$615	5.00	5.00	$3,075.00
02/01/2018	Wash DPPA Swapp	calls with marcus sweetser re: documents; calls with Tom Jarrard re: initial disclosures; edits to initial disclosures.	$615	1.20	1.20	$738.00
02/05/2018	Wash DPPA Swapp	draft offensive discovery; attention to docs collected from Wash. counsel	$615	4.50	4.50	$2,767.50
02/06/2018	Wash DPPA Swapp	draft discovery requests; draft stipulated protective order; draft motion to strike.	$615	2.50	2.50	$1,537.50
02/07/2018	Wash DPPA Swapp	attention to offensive discovery and motion to strike.	$615	1.50	1.50	$922.50
02/09/2018	Wash DPPA Swapp	attention to insurance docs from Swapp; attention to draft offensive discovery.	$615	1.00	1.00	$615.00
02/12/2018	Wash DPPA Swapp	draft and edit interrogatories, motion to strike, stipulated protective order; email to opposing counsel re: oral argument.	$615	1.70	1.70	$1,045.50
02/13/2018	Wash DPPA Swapp	review docs collected from Washington counsel; research re: ethics of contacting Swapp's former employees.	$615	1.50	1.50	$922.50

02/13/2018	Wash DPPA Swapp	prep call for status conference; dial into status conference.	$615	1.00	1.00	$615.00
02/13/2018	Wash DPPA Swapp	attention to motion to strike; calls with T. Jarrard and court re: same.	$615	0.80	0.80	$492.00
02/13/2018	Wash DPPA Swapp	revise draft stipulated protective order.	$615	0.60	0.60	$369.00
02/14/2018	Wash DPPA Swapp	call to clerk re: motion to strike; review status report and telephonic conference order.	$615	0.40	0.40	$246.00
02/15/2018	Wash DPPA Swapp	email to opposing counsel re: stipulated protective order; call to t. jarrard re: re-filed motion to strike.	$615	0.30	0.30	$184.50
02/20/2018	Wash DPPA Swapp	attention to revised RFA; witness interview.	$615	0.40	0.40	$246.00
02/21/2018	Wash DPPA Swapp	research re coverage issues concerning insurer's suit against Swapp	$615	0.50	0.50	$307.50
02/26/2018	Wash DPPA Swapp	attention to docs collected from Wash. counsel;	$615	2.00	2.00	$1,230.00
02/27/2018	Wash DPPA Swapp	review correspondence from opposing counsel and edits to stipulated protective order; research re options for responding to Utah coverage suit.	$615	2.70	2.70	$1,660.50
02/27/2018	Wash DPPA Swapp	call with Craig Swapp's ex-employee Kathleen Britt	$615	0.80	0.80	$492.00
02/27/2018	Wash DPPA Swapp	memo re: call with Swapp's ex employee; review opposition to motion to strike;	$615	0.70	0.70	$430.50
02/28/2018	Wash DPPA Swapp	research and draft reply brief	$615	3.20	3.20	$1,968.00
02/28/2018	Wash DPPA Swapp	draft reply in support of motion to strike.	$615	0.50	0.50	$307.50
03/01/2018	Wash DPPA Swapp	draft reply on motion to strike.	$615	2.10	2.10	$1,291.50
03/02/2018	Wash DPPA Swapp	research and draft reply on motion to strike.	$615	7.50	7.50	$4,612.50
03/05/2018	Wash DPPA Swapp	draft reply in support of motion to strike.	$615	1.20	1.20	$738.00
03/06/2018	Wash DPPA Swapp	attention to drafting reply brief; research/draft letter to opposing counsel re; initial disclosures.	$615	5.00	5.00	$3,075.00
03/07/2018	Wash DPPA Swapp	research and draft letter to opposing counsel re: initial disclosure; attention to edits to reply memo on motion to strike.	$615	6.50	6.50	$3,997.50
03/09/2018	Wash DPPA Swapp	call w/ j. barton and t. jarrard re: discovery; attention to possible search term list; review correspondence from opposing counsel; attention to possible class cert motion	$615	4.00	4.00	$2,460.00
03/12/2018	Wash DPPA Swapp	call with opposing counsel re; search terms; prep for call with opposing counsel; calls with J. Barton and T. Jarrard re: discovery matters.	$615	2.40	2.40	$1,476.00
03/13/2018	Wash DPPA Swapp	review docs for production	$615	3.90	3.90	$2,398.50
03/14/2018	Wash DPPA Swapp	review correspondence from opposing counsel.	$615	0.20	0.20	$123.00
03/14/2018	Wash DPPA Swapp	letter to opposing counsel re: discovery; various calls among co-counsel re: discovery issues; review discovery responses from Swapp.	$615	2.00	2.00	$1,230.00
03/15/2018	Wash DPPA Swapp	various correspondence with opposing counsel; review discovery responses; call with M. Siegel re: discovery.	$615	1.00	1.00	$615.00
03/16/2018	Wash DPPA Swapp	research re: discovery letter to swapp; attention to upcoming document production.	$615	2.50	2.50	$1,537.50
03/19/2018	Wash DPPA Swapp	attention to production of documents; research and draft letter to opposing counsel re: discovery issues; attention to confidentiality issues; emails with opposing counsel re: discovery issues.	$615	5.00	5.00	$3,075.00

03/20/2018	Wash DPPA Swapp	call with jade wilcox re: discovery responses; attention to correspondence with opposing counsel; attention to drafting discovery responses; attention to protective order.	$615	2.30	2.30	$1,414.50
03/21/2018	Wash DPPA Swapp	attention to protective order.	$615	0.50	0.50	$307.50
03/22/2018	Wash DPPA Swapp	research and draft discovery letter to opposing counsel	$615	4.00	4.00	$2,460.00
03/23/2018	Wash DPPA Swapp	attention to letter re: discovery issues; attention to upcoming meet and confer re: search terms; respond to discovery requests	$615	5.50	5.50	$3,382.50
03/25/2018	Wash DPPA Swapp	attention to discovery letter to opposing counsel.	$615	1.80	1.80	$1,107.00
03/26/2018	Wash DPPA Swapp	discovery meet and confer; follow up correspondence; work on letter re: subsequent discovery issues.	$615	1.60	1.60	$984.00
03/26/2018	Wash DPPA Swapp	draft discovery responses; prep for discovery dispute meet and confer	$615	4.70	4.70	$2,890.50
03/26/2018	Wash DPPA Swapp	call w/ Joe Barton re: discovery	$615	0.30	0.30	$184.50
03/27/2018	Wash DPPA Swapp	draft discovery responses; letter to opposing counsel re: discovery issues.	$615	5.50	5.50	$3,382.50
03/28/2018	Wash DPPA Swapp	draft discovery responses; correspondence with opposing counsel.	$615	5.00	5.00	$3,075.00
03/30/2018	Wash DPPA Swapp	download and review document production from defendants; draft discovery responses.	$615	0.90	0.90	$553.50
03/30/2018	Wash DPPA Swapp	respond to discovery requests.	$615	1.70	1.70	$1,045.50
04/02/2018	Wash DPPA Swapp	attention to correspondence with opposing counsel re: discovery.	$615	0.50	0.50	$307.50
04/02/2018	Wash DPPA Swapp	calls with Jade Wilcox; edits to discovery responses; review documents for possible production.	$615	3.30	3.30	$2,029.50
04/03/2018	Wash DPPA Swapp	attention to upcoming discovery responses; calls w/ local counsel re same.	$615	2.50	2.50	$1,537.50
04/04/2018	Wash DPPA Swapp	calls/emails with Washington counsel re: documents; edits/drafting to discovery responses	$615	4.00	4.00	$2,460.00
04/05/2018	Wash DPPA Swapp	attention to discovery responses; call with K. Britt (ex-swapp employee); calls/emails with washington counsel; attention to docs received from Wash. counsel.	$615	4.00	4.00	$2,460.00
04/06/2018	Wash DPPA Swapp	prep for and conduct call with opposing counsel; attention to discovery responses.	$615	4.00	4.00	$2,460.00
04/09/2018	Wash DPPA Swapp	review swapp's response to RFAs; recent correspondence.	$615	0.30	0.30	$184.50
04/11/2018	Wash DPPA Swapp	research re: class cert; attention to memo re: Swapp's ex-employee.	$615	0.60	0.60	$369.00
04/13/2018	Wash DPPA Swapp	draft and edit discovery responses; review letter from opposing counsel.	$615	2.00	2.00	$1,230.00
04/23/2018	Wash DPPA Swapp	prep for and conduct call with defense counsel re: discovery issues; research re: class cert issues.	$615	6.00	6.00	$3,690.00
04/24/2018	Wash DPPA Swapp	follow up on discovery issues raised by Swapp; attention to possible discovery to WSP	$615	3.50	3.50	$2,152.50
04/25/2018	Wash DPPA Swapp	draft offensive discovery; prep for upcoming discovery productions; emails w/ wash. counsel re: discovery issues.	$615	4.00	4.00	$2,460.00
04/26/2018	Wash DPPA Swapp	draft letter to b. duffy re; discovery.	$615	2.00	2.00	$1,230.00

04/27/2018	Wash DPPA Swapp	review ruling from court on motion to strike; call with J. Wilcox re: discovery issues; review docs for production; emails w/ Wash. counsel re: same; review docket filings in Batiste case.	$615	4.00	4.00	$2,460.00
04/30/2018	Wash DPPA Swapp	attention to upcoming doc production; review docs for production; research re: class cert	$615	4.00	4.00	$2,460.00
05/01/2018	Wash DPPA Swapp	review docs for production and priority and confidentiality; letter to b. duffy re: discovery.	$615	2.30	2.30	$1,414.50
05/02/2018	Wash DPPA Swapp	review documents for priority/confidentiality and for production.	$615	1.90	1.90	$1,168.50
05/02/2018	Wash DPPA Swapp	attention to upcoming discovery productions.	$615	0.70	0.70	$430.50
05/03/2018	Wash DPPA Swapp	edit/draft discovery requests in Batiste case; draft settlement demand; review insurance documents; check docket in D. Utah insurance company case.	$615	3.90	3.90	$2,398.50
05/04/2018	Wash DPPA Swapp	attention to doc production; correspond w/ opposing counsel.	$615	2.00	2.00	$1,230.00
05/07/2018	Wash DPPA Swapp	attention to production of documents	$615	0.50	0.50	$307.50
05/09/2018	Wash DPPA Swapp	draft subpoena to WSP.	$615	0.50	0.50	$307.50
05/10/2018	Wash DPPA Swapp	draft subpoena to WSP; calls with co-counsel re: same; draft joint motion to continue class cert deadline; emails w/ co-counsel re: same; call/email with Jade Wilcox re: possible settlement demand; review docs produced by defendants	$615	5.50	5.50	$3,382.50
05/14/2018	Wash DPPA Swapp	attention to motion to continue class cert deadline; attention to service of insurance docs; attention to doc review tech issues;	$615	1.00	1.00	$615.00
05/15/2018	Wash DPPA Swapp	correspond w/ Wash. counsel re: doc production issues; draft letter to opposing counsel; attention to doc collection/production; attention to supplemental discovery responses.	$615	3.20	3.20	$1,968.00
05/16/2018	Wash DPPA Swapp	attention to letter to opposing counsel and amended discovery response; correspond w/ local counsel re: discovery.	$615	1.00	1.00	$615.00
05/21/2018	Wash DPPA Swapp	review swapp's document production; call with Joe Barton re: case status; review swapp's discovery responses.	$615	4.40	4.40	$2,706.00
05/21/2018	Wash DPPA Swapp	research and draft motion to compel interrogatories	$615	1.50	1.50	$922.50
05/22/2018	Wash DPPA Swapp	meet w/ joe barton re: case status; emails with T. Jarrard re: various fact issues.	$615	1.20	1.20	$738.00
05/22/2018	Wash DPPA Swapp	research and draft motion to compel	$615	5.30	5.30	$3,259.50
05/23/2018	Wash DPPA Swapp	emails to co-counsel re: various discovery issues; attention to drafting new subpoenas; draft and edit motion to compel; emails to opposing counsel re: discovery; letter to opposing counsel re: discovery.	$615	5.60	5.60	$3,444.00
05/24/2018	Wash DPPA Swapp	research re: class cert issues; prepare affidavits in support of motion to compel; edits to letter to opposing counsel	$615	4.00	4.00	$2,460.00
05/25/2018	Wash DPPA Swapp	email to opposing counsel re: discovery; review new production from defense; email to J. Sweetser re: motion to quash;	$615	3.00	3.00	$1,845.00
05/29/2018	Wash DPPA Swapp	research and draft class cert brief; edits to motion to compel; emails with co-counsel re: motion to quash and re: various discovery.	$615	4.30	4.30	$2,644.50
05/30/2018	Wash DPPA Swapp	attention to class cert brief; attention to production from WSP	$615	1.10	1.10	$676.50
05/30/2018	Wash DPPA Swapp	prep for WSP depo; work on class cert brief.	$615	3.00	3.00	$1,845.00

05/31/2018	Wash DPPA Swapp	attention to WSP's document production.	$615	1.00	1.00	$615.00
06/01/2018	Wash DPPA Swapp	call with S. WIlliams at Washington State Patrol re: discovery; prep for depo of WSP; review WSP documents.	$615	3.00	3.00	$1,845.00
06/04/2018	Wash DPPA Swapp	edits to motion to quash sweetser subpoenas; review wsp documents; prep for WSP deposition; draft WSP 30-b-6 notice.	$615	6.80	6.80	$4,182.00
06/05/2018	Wash DPPA Swapp	research/draft/edit objections to sweetser subpoena.	$615	2.00	2.00	$1,230.00
06/06/2018	Wash DPPA Swapp	work on wsp depo prep; emails with other counsel re: same; work on WSP 30-b-6 notice; edits to motion to compel.	$615	3.70	3.70	$2,275.50
06/07/2018	Wash DPPA Swapp	attention to depo scheduling.	$615	0.20	0.20	$123.00
06/07/2018	Wash DPPA Swapp	edits to 30-b-6 notice to WSP.	$615	1.00	1.00	$615.00
06/07/2018	Wash DPPA Swapp	attention to prep for 30-b-6 depo of WSP	$615	2.90	2.90	$1,783.50
06/07/2018	Wash DPPA Swapp	edits to 30-b-6 notice.	$615	0.60	0.60	$369.00
06/08/2018	Wash DPPA Swapp	attention to subpoenas to third parties.	$615	0.40	0.40	$246.00
06/11/2018	Wash DPPA Swapp	work on prepping for WSP 30-b-6 depo.	$615	4.00	4.00	$2,460.00
06/12/2018	Wash DPPA Swapp	prep for WSP 30b6; calls with Seattle counsel re CJTC subpoena production location; attention to upcoming document productions; correspondence w/ WSP counsel re: upcoming deposition; review/draft correspondence w/ opposing counsel re: discovery issues.	$615	2.00	2.00	$1,230.00
06/12/2018	Wash DPPA Swapp	prep for WSP 30-b-6	$615	0.50	0.50	$307.50
06/13/2018	Wash DPPA Swapp	review docs received from state; prep for WSP 30b6	$615	6.00	6.00	$3,690.00
06/14/2018	Wash DPPA Swapp	prep for 30-b-6 deposition; organize documents for 30-b-6 deposition	$615	4.50	4.50	$2,767.50
06/15/2018	Wash DPPA Swapp	review documents from discovery record; attention to letter to opposing counsel re: discovery issues; prep for 30-b-6 depo; organize docs for 30-b-6 depo.	$615	4.90	4.90	$3,013.50
06/17/2018	Wash DPPA Swapp	prep for 30-b-6 depo; organize and assemble exhibits; travel from Boston to Olympia, WA	$615	8.00	8.00	$4,920.00
06/18/2018	Wash DPPA Swapp	take 30-b-6 depo of Wash. State Patrol	$615	9.00	9.00	$5,535.00
06/19/2018	Wash DPPA Swapp	travel from Seattle to Boston; edits to interrogatory responses in Batiste case; call with counsel for criminal justice training commission;	$615	4.20	11.20	$6,888.00
06/20/2018	Wash DPPA Swapp	email to counsel for CJTC re: discovery issues; review ints to Wilcox in Batiste case; review objections to Sweetser subpoena; attention to prep for Jade Wilcox depo prep; work on class cert brief.	$615	5.00	5.00	$3,075.00
06/21/2018	Wash DPPA Swapp	work on reply brief in support of discovery motion; attention to prep for upcoming depos; work on class cert motion.	$615	7.00	7.00	$4,305.00
06/22/2018	Wash DPPA Swapp	research and draft and edit reply in support of discovery motion; various calls/emails w/ Spokane counsel re: discovery issues and re: Wilcox deposition.	$615	5.40	5.40	$3,321.00
06/25/2018	Wash DPPA Swapp	draft motion for class cert; prep for next 30-b-6 depo; revisions to reply on discovery motion.	$615	4.00	4.00	$2,460.00
06/26/2018	Wash DPPA Swapp	attention to correspondence from Spokane PD and from Wash. AG.	$615	0.20	0.20	$123.00
06/26/2018	Wash DPPA Swapp	calls with Wash. AG's office re: discovery; attention to correspondence with counsel to the Department of Licensing.	$615	1.20	1.20	$738.00

06/26/2018	Wash DPPA Swapp	email to the DOL's counsel re: subpoena; edits to reply brief	$615	2.20	2.20	$1,353.00
06/26/2018	Wash DPPA Swapp	attention to exhibits/affidavit in support of reply on motion to compel.	$615	0.50	0.50	$307.50
06/27/2018	Wash DPPA Swapp	research, draft, edit letter to opposing counsel re: discovery issues; attention to edits/drafting on reply in support of motion to compel; review docs produced by third parties under RUle 45; prep for next 30-b-6 depo.	$615	7.00	7.00	$4,305.00
06/28/2018	Wash DPPA Swapp	prep for 30-b-6 deposition.	$615	3.00	3.00	$1,845.00
06/28/2018	Wash DPPA Swapp	review recent doc productions; prep for 30-b-6 of WSP.	$615	4.20	4.20	$2,583.00
06/29/2018	Wash DPPA Swapp	prep for upcoming 30-b-6; call with counsel for Spokane PD re: discovery; correspond with counsel for WSP re: discovery issues; correspond w/ counsel for CJTC re: discovery issues.	$615	5.00	5.00	$3,075.00
07/01/2018	Wash DPPA Swapp	prep for 30-b-6 and organize documents for same.	$615	4.00	4.00	$2,460.00
07/01/2018	Wash DPPA Swapp	travel to olympia washington	$615	8.00	8.00	$4,920.00
07/02/2018	Wash DPPA Swapp	take 30-b-6 depo of wash state patrol.	$615	8.50	8.50	$5,227.50
07/02/2018	Wash DPPA Swapp	draft second motion to compel;	$615	3.00	3.00	$1,845.00
07/03/2018	Wash DPPA Swapp	attention to second motion to compel.	$615	2.50	2.50	$1,537.50
07/03/2018	Wash DPPA Swapp	travel from Seattle to Boston	$615	7.00	7.00	$4,305.00
07/05/2018	Wash DPPA Swapp	emails with counsel for third parties re: depositions/discovery; draft motion for class cert; read J. WIlcox deposition.	$615	6.20	6.20	$3,813.00
07/06/2018	Wash DPPA Swapp	draft motion for class cert; review discovery docs.	$615	4.00	4.00	$2,460.00
07/09/2018	Wash DPPA Swapp	emails/calls to CJTC counsel, DOL counsel, defense counsel, Spokane Police counsel and Spokane local counsel re: discovery re: discovery schedule; research/draft/edit motion for class cert; prep for upcoming rounds of depos.	$615	5.80	5.80	$3,567.00
07/10/2018	Wash DPPA Swapp	research/draft motion for class cert;attention to depo subpoenas; calls/emails w/ opposing counsel and third-party counsel re: various discovery issues.	$615	6.50	6.50	$3,997.50
07/11/2018	Wash DPPA Swapp	attention to third-party depo subpoenas; correspond w/ third-party counsel; research/draft motion for class cert.	$615	7.50	7.50	$4,612.50
07/12/2018	Wash DPPA Swapp	correspond w/ third party counsel re: discovery issues; research/draft/edit class cert motion; prep for upcoming depos.	$615	7.50	7.50	$4,612.50
07/13/2018	Wash DPPA Swapp	research/draft/edit class cert motion; review depo transcripts; call with spokane counsel re: batiste depo	$615	7.00	7.00	$4,305.00
07/16/2018	Wash DPPA Swapp	call with opposing counsel re discovery issues; draft/edit class cert brief.	$615	6.20	6.20	$3,813.00
07/17/2018	Wash DPPA Swapp	review docs produced by defendants; research and draft motion for class cert; attention to correspondence with opposing counsel re: motion to compel;	$615	7.50	7.50	$4,612.50
07/18/2018	Wash DPPA Swapp	prep for DOL deposition; correspondence with counsel to DOL and CJTC re: depo; research/draft edit class cert motion.	$615	7.50	7.50	$4,612.50
07/19/2018	Wash DPPA Swapp	prep for SPD, DOL and CJTC depositions, and draft prep memos re: same; call with CJTC counsel re 30-b-6 depo; attention to affidavit from jade wilcox re: class cert; draft/edit class cert motion;	$615	7.30	7.30	$4,489.50
07/19/2018	Wash DPPA Swapp	attention to correspondence w/ defense counsel re: reply deadline;	$615	0.20	0.20	$123.00
07/20/2018	Wash DPPA Swapp	research/draft/edit class cert motion.	$615	7.00	7.00	$4,305.00

07/20/2018	Wash DPPA Swapp	draft motion to extend deadline for reply brief; calls/emails with opposing counsel re: same; draft stipulation re: extension of reply deadline;	$615	1.00	1.00	$615.00
07/22/2018	Wash DPPA Swapp	research re: possible amended complaint.	$615	1.50	1.50	$922.50
07/24/2018	Wash DPPA Swapp	attention to prep for CJTC/DOL depositions.	$615	1.00	1.00	$615.00
07/25/2018	Wash DPPA Swapp	attention to production of SECTOR source code.	$615	0.50	0.50	$307.50
07/26/2018	Wash DPPA Swapp	attention to docs received from third parties; emails with co-counsel re: firm bio.	$615	0.40	0.40	$246.00
07/29/2018	Wash DPPA Swapp	draft wilcox affidavit and draft amended complaint.	$615	6.00	6.00	$3,690.00
07/30/2018	Wash DPPA Swapp	attention to correspondence re: docs reviewed by WSP witnesses; various prep for DOL deposition; attention to errata sheets from prior depos; research and draft and revise class cert memo; attention to class cert exhibits.	$615	5.00	5.00	$3,075.00
07/30/2018	Wash DPPA Swapp	research/draft reply memo on discovery dispute;	$615	3.00	3.00	$1,845.00
07/31/2018	Wash DPPA Swapp	attention to drafting/revision/research on class cert motion.	$615	11.00	11.00	$6,765.00
07/31/2018	Wash DPPA Swapp	attention to drafting/revision of motion to compel reply brief	$615	2.00	2.00	$1,230.00
08/01/2018	Wash DPPA Swapp	attention to amended complaint; attention to affidavits of counsel in support of class cert motion; emails with Jade Wilcox re: affidavit in support of class cert motion;	$615	7.00	7.00	$4,305.00
08/02/2018	Wash DPPA Swapp	emails with opposing counsel re: amended complaint; research/draft motion to amend;	$615	7.00	7.00	$4,305.00
08/03/2018	Wash DPPA Swapp	revisions to affidavits in support of class cert; call with Jade Wilcox re: signing declaration in support of class cert.; read SPD and DOL depo transcripts;	$615	2.50	2.50	$1,537.50
08/05/2018	Wash DPPA Swapp	revise class cert brief; correct fact citations to the record; read SPD depo.	$615	7.00	7.00	$4,305.00
08/06/2018	Wash DPPA Swapp	revise and edit class cert brief and supporting documents; check fact citations; edits to affidavits in support of class cert.; revisions to motion to amend the complaint.	$615	5.00	5.00	$3,075.00
08/06/2018	Wash DPPA Swapp	update various cites in class cert brief; revisions/edits to same; edits to supporting docs; draft/edit/revise motion to amend the complaint.	$615	4.00	4.00	$2,460.00
08/13/2018	Wash DPPA Swapp	review docs produced by CJTC, and review T. Johnson errata.	$615	1.00	1.00	$615.00
08/14/2018	Wash DPPA Swapp	attention to stipulation re: amended complaint; email to opposing counsel re: CJTC production; research re: effect of substantive changes in errata sheets.	$615	2.50	2.50	$1,537.50
08/22/2018	Wash DPPA Swapp	review swapp's production of unredacted documents; email to opposing counsel re: "quick peek" documents; research re: standards for errata sheet motions to strike.	$615	6.00	6.00	$3,690.00
08/23/2018	Wash DPPA Swapp	memo to matt smith re: case status; research and draft memo re: errata sheet issues; phone calls with matt smith re: various case status issues.	$615	6.00	6.00	$3,690.00
08/24/2018	Wash DPPA Swapp	attention to tallying hours on second motion to compel.	$615	1.00	1.00	$615.00
08/24/2018	Wash DPPA Swapp	research re: errata sheet changes	$615	0.70	0.70	$430.50
		Total Labor For Thomas Kirchofer		**645.60**	**652.60**	**$399,954.00**

Exhibit C

Block & Leviton LLP - User Summary

Date Start: 1/1/2017 | Date End: 2/21/2020 | Clients: Wash DPPA | Projects: Swapp | Users: | Account Managers: All

Date	Client	Project	Description	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
Colin Downes							
10/01/2018	Wash DPPA	Swapp	Review/analyze issues re class certification.	$475.00 hr	1.20	1.20	$570.00
10/02/2018	Wash DPPA	Swapp	Draft/revise opposition to motion to dismiss.	$475.00 hr	2.90	2.90	$1,377.50
10/02/2018	Wash DPPA	Swapp	Review/analyze issues re class certification.	$475.00 hr	2.50	2.50	$1,187.50
10/02/2018	Wash DPPA	Swapp	Meet with J. Barton re class certification.	$475.00 hr	0.80	0.80	$380.00
10/03/2018	Wash DPPA	Swapp	Review/analyze Defendant's Reply Memorandum on Motion to Compel Sweetser.	$475.00 hr	0.40	0.40	$190.00
10/03/2018	Wash DPPA	Swapp	Review/analyze factual issues re SECTOR.	$475.00 hr	0.50	0.50	$237.50
10/05/2018	Wash DPPA	Swapp	Review/analyze issues re class certification, including review of deposition testimony and analysis of SECTOR source code.	$475.00 hr	5.90	5.90	$2,802.50
10/16/2018	Wash DPPA	Swapp	Review/analyze issues re class certification.	$475.00 hr	5.60	5.60	$2,660.00
10/17/2018	Wash DPPA	Swapp	Review/analzye issues re class certification.	$475.00 hr	3.00	3.00	$1,425.00
10/17/2018	Wash DPPA	Swapp	Draft/revise reply memo re class certification.	$475.00 hr	3.00	3.00	$1,425.00
10/18/2018	Wash DPPA	Swapp	Draft/revise reply re class certification.	$475.00 hr	6.30	6.30	$2,992.50
10/19/2018	Wash DPPA	Swapp	Draft/revise reply brief re class certification.	$475.00 hr	4.20	4.20	$1,995.00
10/21/2018	Wash DPPA	Swapp	Draft/revise reply memorandum re class cert.	$475.00 hr	4.40	4.40	$2,090.00
10/22/2018	Wash DPPA	Swapp	Draft/revise reply memorandum re class cert.	$475.00 hr	6.80	6.80	$3,230.00
10/23/2018	Wash DPPA	Swapp	Draft/revise reply memorandum re class cert.	$475.00 hr	9.20	9.20	$4,370.00
10/25/2018	Wash DPPA	Swapp	Draft/revise reply memorandum re class cert.	$475.00 hr	3.70	3.70	$1,757.50
10/26/2018	Wash DPPA	Swapp	Draft/revise reply memorandum re class cert.	$475.00 hr	4.50	4.50	$2,137.50
10/28/2018	Wash DPPA	Swapp	Review/analyze issues re damages on class certification briefing.	$475.00 hr	2.00	2.00	$950.00
10/28/2018	Wash DPPA	Swapp	Draft/revise class certificaiton reply memorandum.	$475.00 hr	5.50	5.50	$2,612.50
10/28/2018	Wash DPPA	Swapp	Email correspondence with J. Barton.	$475.00 hr	0.40	0.40	$190.00
10/29/2018	Wash DPPA	Swapp	Meeting with RJB re class certification issues.	$475.00 hr	0.50	0.50	$237.50
10/29/2018	Wash DPPA	Swapp	Draft/revise motion for extension of deadline re class certification reply.	$475.00 hr	1.50	1.50	$712.50
10/29/2018	Wash DPPA	Swapp	Email correspondence with opposing counsel and local counsel re motion for extension of deadline re class certification reply.	$475.00 hr	0.50	0.50	$237.50
10/30/2018	Wash DPPA	Swapp	Review/analyze issues re substitution of named plaintiff and Department of Licensing records and procedures.	$475.00 hr	2.80	2.80	$1,330.00
10/30/2018	Wash DPPA	Swapp	Draft/revise reply re class certification, declaration, and exhibits.	$475.00 hr	1.20	1.20	$570.00
10/30/2018	Wash DPPA	Swapp	Review/analyze briefing in related case re implications for motion to dismiss briefing.	$475.00 hr	0.90	0.90	$427.50

10/31/2018	Wash DPPA Swapp	Draft/revise reply memorandum re class certification.	$475.00 hr	3.20	3.20	$1,520.00
11/06/2018	Wash DPPA Swapp	Review/analyze issues re redacted materials produced by Swapp.	$475.00 hr	1.20	1.20	$570.00
11/13/2018	Wash DPPA Swapp	Review/analyze Swapp productions for fact research and consideration of propriety of redactions.	$475.00 hr	5.50	5.50	$2,612.50
11/14/2018	Wash DPPA Swapp	Email correspondence with J. Barton re redactions of discovery.	$475.00 hr	0.70	0.70	$332.50
01/28/2019	Wash DPPA Swapp	Review/analyze class certification opinion.	$475.00 hr	0.60	0.60	$285.00
01/28/2019	Wash DPPA Swapp	Review/analyze issues re class notice.	$475.00 hr	2.00	2.00	$950.00
01/28/2019	Wash DPPA Swapp	Draft/revise class notice.	$475.00 hr	1.20	1.20	$570.00
02/04/2019	Wash DPPA Swapp	Draft/revise joint status report.	$475.00 hr	2.30	2.30	$1,092.50
02/05/2019	Wash DPPA Swapp	Draft/revise RFP re claims notice administration.	$475.00 hr	2.50	2.50	$1,187.50
02/07/2019	Wash DPPA Swapp	Draft/revise RFP re claim notice.	$475.00 hr	0.80	0.80	$380.00
02/08/2019	Wash DPPA Swapp	Draft/revise status report	$475.00 hr	2.50	2.50	$1,187.50
02/08/2019	Wash DPPA Swapp	Email correspondence with claim notice service providers.	$475.00 hr	0.50	0.50	$237.50
02/14/2019	Wash DPPA Swapp	Draft/revise class notice RFP.	$475.00 hr	2.50	2.50	$1,187.50
02/15/2019	Wash DPPA Swapp	Draft/revise class notice RFP.	$475.00 hr	1.10	1.10	$522.50
02/20/2019	Wash DPPA Swapp	Telephone call with T. Jarrard, J. Sweetser, M. Sweetser, RJB re case status and next steps.	$475.00 hr	1.00	1.00	$475.00
04/08/2019	Wash DPPA Swapp	Review/analyze documents produced for mediation.	$475.00 hr	1.50	1.50	$712.50
04/09/2019	Wash DPPA Swapp	Review/analyze documents produced for mediation.	$475.00 hr	1.50	1.50	$712.50
05/06/2019	Wash DPPA Swapp	Draft/revise confidential settlement letter.	$475.00 hr	3.50	3.50	$1,662.50
05/07/2019	Wash DPPA Swapp	Draft/revise confidential settlement letter.	$475.00 hr	1.50	1.50	$712.50
05/17/2019	Wash DPPA Swapp	Review/analyze Defendant financial statements.	$475.00 hr	0.80	0.80	$380.00
06/06/2019	Wash DPPA Swapp	Draft/revise Settlement Agreement.	$475.00 hr	2.20	2.20	$1,045.00
06/12/2019	Wash DPPA Swapp	Draft/revise settlement agreement.	$475.00 hr	2.80	2.80	$1,330.00
06/13/2019	Wash DPPA Swapp	Draft/revise settlement agreement.	$475.00 hr	3.70	3.70	$1,757.50
06/28/2019	Wash DPPA Swapp	Draft/revise Settlement Agreement.	$475.00 hr	3.80	3.80	$1,805.00
07/30/2019	Wash DPPA Swapp	Draft/revise Settlement Agreement.	$475.00 hr	4.80	4.80	$2,280.00
07/30/2019	Wash DPPA Swapp	Review/analyze transcript of mediation hearing.	$475.00 hr	0.50	0.50	$237.50
07/31/2019	Wash DPPA Swapp	Draft/revise Settlement Agreement.	$475.00 hr	1.60	1.60	$760.00
08/20/2019	Wash DPPA Swapp	Draft/revise RFP re settlement administration services.	$475.00 hr	1.50	1.50	$712.50
08/20/2019	Wash DPPA Swapp	Review/analyze issues re Class Notice.	$475.00 hr	0.80	0.80	$380.00
08/21/2019	Wash DPPA Swapp	Email correspondence and phone calls with potential settlement administration service providers re RFP for settlement administration services.	$475.00 hr	1.40	1.40	$665.00
08/22/2019	Wash DPPA Swapp	Draft/revise class notice.	$475.00 hr	4.20	4.20	$1,995.00
08/26/2019	Wash DPPA Swapp	Review/analyze issues re Settlement Agreement.	$475.00 hr	0.70	0.70	$332.50
08/26/2019	Wash DPPA Swapp	Email correspondence with potential class administration service providers.	$475.00 hr	0.50	0.50	$237.50
08/30/2019	Wash DPPA Swapp	Draft/revise Class notice	$475.00 hr	2.10	2.10	$997.50
08/30/2019	Wash DPPA Swapp	Review/analyze RFP responses from settlement administrator vendors.	$475.00 hr	1.50	1.50	$712.50
09/18/2019	Wash DPPA Swapp	Email correspondence with settlement administrators re RFP.	$475.00 hr	0.80	0.80	$380.00

09/18/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion.	$475.00 hr	2.20	2.20	$1,045.00
09/19/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion.	$475.00 hr	4.50	4.50	$2,137.50
09/19/2019	Wash DPPA Swapp	Review/analyze issues re E.D. Wash precedents relating to class certification approval.	$475.00 hr	1.80	1.80	$855.00
09/20/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion.	$475.00 hr	2.20	2.20	$1,045.00
09/23/2019	Wash DPPA Swapp	Review/analyze issues re class data and email correspondence with M. Sweetser and T. Jarrard re same.	$475.00 hr	0.80	0.80	$380.00
09/23/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion.	$475.00 hr	2.50	2.50	$1,187.50
09/24/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion.	$475.00 hr	1.60	1.60	$760.00
09/25/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion.	$475.00 hr	1.50	1.50	$712.50
09/30/2019	Wash DPPA Swapp	Review/analyze class data	$475.00 hr	2.00	2.00	$950.00
10/01/2019	Wash DPPA Swapp	Telephone calls with settlement administration RFP respondents re proposal assumptions.	$475.00 hr	1.50	1.50	$712.50
10/02/2019	Wash DPPA Swapp	Draft/revise Plan of Allocation, Second Settlement Certificate, Settlement Agreement.	$475.00 hr	3.10	3.10	$1,472.50
10/02/2019	Wash DPPA Swapp	Review/analyze settlement administrator RFP responses.	$475.00 hr	0.50	0.50	$237.50
10/03/2019	Wash DPPA Swapp	Draft 2d Settlement Certificate.	$475.00 hr	0.90	0.90	$427.50
10/07/2019	Wash DPPA Swapp	Draft/revise settlement agreement.	$475.00 hr	2.20	2.20	$1,045.00
10/10/2019	Wash DPPA Swapp	Draft/revise motion for preliminary approval.	$475.00 hr	3.50	3.50	$1,662.50
10/11/2019	Wash DPPA Swapp	Telephone call with RJB re plan of allocation.	$475.00 hr	0.30	0.30	$142.50
10/14/2019	Wash DPPA Swapp	Review/analyze class data.	$475.00 hr	0.80	0.80	$380.00
10/14/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion.	$475.00 hr	2.20	2.20	$1,045.00
10/15/2019	Wash DPPA Swapp	Draft/revise 3rd Settlement Certificate.	$475.00 hr	0.80	0.80	$380.00
10/15/2019	Wash DPPA Swapp	Review/analyze bids for settlement administration services.	$475.00 hr	2.50	2.50	$1,187.50
10/15/2019	Wash DPPA Swapp	Draft/revise proposed order re preliminary approval and Barton Declaration re preliminary approval.	$475.00 hr	3.30	3.30	$1,567.50
10/15/2019	Wash DPPA Swapp	Email correspondence and telephone calls with settlement administration RFP bid respondents.	$475.00 hr	1.10	1.10	$522.50
10/16/2019	Wash DPPA Swapp	Draft/revise plan of allocation.	$475.00 hr	0.50	0.50	$237.50
10/16/2019	Wash DPPA Swapp	Email correspondence and phone calls with opposing counsel re settlement certificate.	$475.00 hr	0.80	0.80	$380.00
10/17/2019	Wash DPPA Swapp	Review/analyze revised bids re settlement administration services.	$475.00 hr	1.20	1.20	$570.00
10/23/2019	Wash DPPA Swapp	Review/analyze issues re settlement administrator appointment and email communication with RG/2 and Angeion re same.	$475.00 hr	0.60	0.60	$285.00
10/23/2019	Wash DPPA Swapp	Review/analyze issues re local rules and preliminary approval hearing date.	$475.00 hr	0.40	0.40	$190.00
10/24/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion, Downes Declaration, Barton Declaration, and proposed order.	$475.00 hr	2.60	2.60	$1,235.00
10/24/2019	Wash DPPA Swapp	Email correspondence with opposing counsel re finalizing settlement agreement.	$475.00 hr	0.40	0.40	$190.00

10/24/2019	Wash DPPA Swapp	Email correspondence and telephone calls with settlement administrators re finalizing bids for court.	$475.00 hr	0.60	0.60	$285.00
10/25/2019	Wash DPPA Swapp	Draft/revise preliminary approval motion and ancillary documents.	$475.00 hr	1.80	1.80	$855.00
10/25/2019	Wash DPPA Swapp	Manage data/files re preliminary approval filing.	$475.00 hr	0.40	0.40	$190.00
10/25/2019	Wash DPPA Swapp	Telephone call with M. Siegel re issues related to filing of motion for preliminary approval.	$475.00 hr	0.30	0.30	$142.50
10/28/2019	Wash DPPA Swapp	Review/analyze issues re wire instructions and settlement agreement.	$475.00 hr	0.60	0.60	$285.00
10/29/2019	Wash DPPA Swapp	Email correspondence with settlement administration RFP respondents.	$475.00 hr	0.30	0.30	$142.50
10/31/2019	Wash DPPA Swapp	Review/analyze issues re Sirius XM DPPA case.	$475.00 hr	0.50	0.50	$237.50
12/03/2019	Wash DPPA Swapp	Review/analyze class data and email correspondence with opposing counsel re same.	$475.00 hr	1.50	1.50	$712.50
12/10/2019	Wash DPPA Swapp	Call with settlement administrator re notice issues.	$475.00 hr	0.50	0.50	$237.50
12/19/2019	Wash DPPA Swapp	Review/analyze issues re class notice and website.	$475.00 hr	0.80	0.80	$380.00
12/23/2019	Wash DPPA Swapp	Review/analyze issues re fee estimate and email correspondence with RJB and J. Sweetser re same.	$475.00 hr	1.20	1.20	$570.00
12/23/2019	Wash DPPA Swapp	Call Angeion Group re Class Notice.	$475.00 hr	0.40	0.40	$190.00
12/26/2019	Wash DPPA Swapp	Email correspondence with J. Sweetser re attorneys fees.	$475.00 hr	0.40	0.40	$190.00
12/26/2019	Wash DPPA Swapp	Review/analyze issues re calculation of attorneys fees.	$475.00 hr	1.60	1.60	$760.00
12/26/2019	Wash DPPA Swapp	Review/analyze issues re attorneys fees estimate and email correspondence with RJB re same.	$475.00 hr	0.50	0.50	$237.50
01/03/2020	Wash DPPA Swapp	Email correspondence and phone calls with Angeion re scope of settlement administration services.	$475.00 hr	0.60	0.60	$285.00
01/03/2020	Wash DPPA Swapp	Draft/revise direction letter and email correspondence with opposing counsel re same.	$475.00 hr	0.50	0.50	$237.50
			Total Labor For Colin Downes	**210.30**	**210.30**	**$99,892.50**

Jason Leviton

08/09/2017	Wash DPPA Swapp	Factual Research; Review/Edit Complaint; Meeting with J. Barton RE Complaint.	$875.00 hr	1.80	1.80	$1,575.00
08/25/2017	Wash DPPA Swapp	Research and Edit Pro Hac Motion	$875.00 hr	1.20	1.20	$1,050.00
10/23/2017	Wash DPPA Swapp	Review/Analyze Defendants' Motion to Dismiss.	$875.00 hr	0.80	0.80	$700.00
11/15/2017	Wash DPPA Swapp	Emails and Call with Barton RE MTD Hearing	$875.00 hr	0.30	0.30	$262.50
12/18/2017	Wash DPPA Swapp	Review MTD Briefing.	$875.00 hr	1.80	1.80	$1,575.00
12/27/2017	Wash DPPA Swapp	Review Order Denying MTD	$875.00 hr	0.40	0.40	$350.00
02/16/2018	Wash DPPA Swapp	Mediator Research.	$875.00 hr	0.30	0.30	$262.50
01/24/2019	Wash DPPA Swapp	Review Order on MTD	$875.00 hr	0.30	0.30	$262.50
01/25/2019	Wash DPPA Swapp	Review Class Cert Decision.	$875.00 hr	0.40	0.40	$350.00
02/01/2019	Wash DPPA Swapp	Claims Admin Research; Call with Ming	$875.00 hr	0.30	0.30	$262.50

02/12/2019	Wash DPPA Swapp	Call with Barton; Review Settlement Filing.	$875.00 hr	0.30	0.30	$262.50
			Total Labor For Jason Leviton	**7.90**	**7.90**	**$6,912.50**

Joe Barton

06/09/2017	Wash DPPA Swapp	review complaint and TRO in Batiste case	$875.00 hr	0.50	0.50	$437.50
07/11/2017	Wash DPPA Swapp	correspondence with T. Kirchofer and T. Jarrard re: complaint	$875.00 hr	0.10	0.10	$87.50
07/20/2017	Wash DPPA Swapp	review of N.D. Indiana decision & corresp w/ Ps counsel re: same	$875.00 hr	0.40	0.40	$350.00
07/31/2017	Wash DPPA Swapp	review complaint and background info	$875.00 hr	1.80	1.80	$1,575.00
08/03/2017	Wash DPPA Swapp	edit complaint	$875.00 hr	0.90	0.90	$787.50
08/03/2017	Wash DPPA Swapp	edit complaint	$875.00 hr	3.00	3.00	$2,625.00
08/04/2017	Wash DPPA Swapp	Edit complaint	$875.00 hr	11.40	11.40	$9,975.00
08/05/2017	Wash DPPA Swapp	correspondence with. T. Jarrard and T. Kirchafer re: class definition in complaint	$875.00 hr	0.10	0.10	$87.50
08/06/2017	Wash DPPA Swapp	correspondence with M. Sweetser re : Washington Bar complaint	$875.00 hr	0.20	0.20	$175.00
08/06/2017	Wash DPPA Swapp	review/edit complaint	$875.00 hr	0.60	0.60	$525.00
08/07/2017	Wash DPPA Swapp	correspondence with Plaintiff's council re: class deposition	$875.00 hr	0.50	0.50	$437.50
08/07/2017	Wash DPPA Swapp	review email from and correspondence with T. Kirchofer re: edits to complaint	$875.00 hr	0.40	0.40	$350.00
08/07/2017	Wash DPPA Swapp	correspondence with J. Sweetser re: class definition	$875.00 hr	0.20	0.20	$175.00
08/09/2017	Wash DPPA Swapp	edit class deinition	$875.00 hr	1.30	1.30	$1,137.50
08/09/2017	Wash DPPA Swapp	review edits to complaint from J. Leviton and further edits thereto	$875.00 hr	0.50	0.50	$437.50
08/11/2017	Wash DPPA Swapp	review letters / emails re: State ? & correspondence with co-counsel re: same	$875.00 hr	0.40	0.40	$350.00
08/15/2017	Wash DPPA Swapp	correspondence with Plts counsel re: service of complaint	$875.00 hr	0.80	0.80	$700.00
08/15/2017	Wash DPPA Swapp	review Swapp letters to Wash State Bar	$875.00 hr	0.50	0.50	$437.50
08/24/2017	Wash DPPA Swapp	review and edit pro hac vice motion	$875.00 hr	0.40	0.40	$350.00
09/26/2017	Wash DPPA Swapp	edit webpage	$875.00 hr	0.50	0.50	$437.50
10/19/2017	Wash DPPA Swapp	correspondence with R. McBride re: scheduling	$875.00 hr	0.30	0.30	$262.50
10/20/2017	Wash DPPA Swapp	review defendants MTD	$875.00 hr	0.80	0.80	$700.00
10/20/2017	Wash DPPA Swapp	call with T. Kirchofer re: MTD	$875.00 hr	0.30	0.30	$262.50
10/20/2017	Wash DPPA Swapp	call with T. Jarrard re: MTD	$875.00 hr	0.60	0.60	$525.00
10/23/2017	Wash DPPA Swapp	review defendants MTD attachments	$875.00 hr	0.30	0.30	$262.50
10/23/2017	Wash DPPA Swapp	call with Plts counsel re: MTD	$875.00 hr	0.50	0.50	$437.50
10/23/2017	Wash DPPA Swapp	review declarations from Wilcox v. Batiste for MTD	$875.00 hr	1.00	1.00	$875.00
10/31/2017	Wash DPPA Swapp	review draft app to MTD	$875.00 hr	1.00	1.00	$875.00
11/02/2017	Wash DPPA Swapp	review draft opp MTD	$875.00 hr	1.00	1.00	$875.00
11/03/2017	Wash DPPA Swapp	review draft opposition to MTD	$875.00 hr	1.30	1.30	$1,137.50
11/03/2017	Wash DPPA Swapp	call with T. Kirchofer re: opposition to MTD	$875.00 hr	0.80	0.80	$700.00
11/07/2017	Wash DPPA Swapp	review opp to MTD	$875.00 hr	3.60	3.60	$3,150.00
11/08/2017	Wash DPPA Swapp	edit opp to MTD	$875.00 hr	1.00	1.00	$875.00
11/08/2017	Wash DPPA Swapp	edit opp to MTD	$875.00 hr	0.50	0.50	$437.50

11/08/2017	Wash DPPA Swapp	edit opp to MTD	$875.00 hr	1.60	1.60	$1,400.00
11/08/2017	Wash DPPA Swapp	edit opp to MTD	$875.00 hr	0.80	0.80	$700.00
11/08/2017	Wash DPPA Swapp	edit opp to MTD	$875.00 hr	4.50	4.50	$3,937.50
11/09/2017	Wash DPPA Swapp	review opp to Judicial Notice	$875.00 hr	0.40	0.40	$350.00
11/09/2017	Wash DPPA Swapp	correspondence with T. Kirchofer re: opp to Judicial Notice	$875.00 hr	0.50	0.50	$437.50
11/09/2017	Wash DPPA Swapp	edit opp to MTD	$875.00 hr	2.00	2.00	$1,750.00
11/09/2017	Wash DPPA Swapp	edit opp to MTD	$875.00 hr	2.00	2.00	$1,750.00
11/09/2017	Wash DPPA Swapp	edit opp to MTD	$875.00 hr	3.30	3.30	$2,887.50
11/10/2017	Wash DPPA Swapp	edit opp to MTD	$875.00 hr	2.50	2.50	$2,187.50
11/10/2017	Wash DPPA Swapp	edit opp to MTD	$875.00 hr	0.50	0.50	$437.50
11/10/2017	Wash DPPA Swapp	edit opp to MTD	$875.00 hr	2.00	2.00	$1,750.00
11/12/2017	Wash DPPA Swapp	edit / review opp to MTD	$875.00 hr	2.80	2.80	$2,450.00
11/12/2017	Wash DPPA Swapp	edit/ review opposition to request for judicial notice	$875.00 hr	3.50	3.50	$3,062.50
11/12/2017	Wash DPPA Swapp	edit/ review opposition to request for judicial notice	$875.00 hr	1.00	1.00	$875.00
11/13/2017	Wash DPPA Swapp	correspondence with Plts counsel re: opposition to MTD	$875.00 hr	0.20	0.20	$175.00
11/13/2017	Wash DPPA Swapp	review/ edit opposition to MTD	$875.00 hr	0.70	0.70	$612.50
11/13/2017	Wash DPPA Swapp	review/ approve final opposition to MTD	$875.00 hr	0.40	0.40	$350.00
11/15/2017	Wash DPPA Swapp	correspondence with J. Leviton re: oral argument on MTD	$875.00 hr	0.10	0.10	$87.50
11/27/2017	Wash DPPA Swapp	review defendants reply on MTD	$875.00 hr	0.50	0.50	$437.50
12/04/2017	Wash DPPA Swapp	review defendants cases cited in reply on MTD	$875.00 hr	0.50	0.50	$437.50
12/12/2017	Wash DPPA Swapp	prep for hearing on MTD	$875.00 hr	0.40	0.40	$350.00
12/17/2017	Wash DPPA Swapp	prep for oral agreement on MTD	$875.00 hr	2.00	2.00	$1,750.00
12/17/2017	Wash DPPA Swapp	prep for oral agreement on MTD	$875.00 hr	0.80	0.80	$700.00
12/18/2017	Wash DPPA Swapp	prep for oral agreement on MTD	$875.00 hr	0.50	0.50	$437.50
12/18/2017	Wash DPPA Swapp	prep for oral agreement on mTD	$875.00 hr	0.80	0.80	$700.00
12/18/2017	Wash DPPA Swapp	prep for oral agreement on MTD	$875.00 hr	1.00	1.00	$875.00
12/19/2017	Wash DPPA Swapp	prep for oral agreement on MTD	$875.00 hr	2.80	2.80	$2,450.00
12/19/2017	Wash DPPA Swapp	prep for oral agreement on MTD	$875.00 hr	1.70	1.70	$1,487.50
12/19/2017	Wash DPPA Swapp	prep for oral agreement on MTD	$875.00 hr	5.00	5.00	$4,375.00
12/20/2017	Wash DPPA Swapp	prep for oral agreement on MTD	$875.00 hr	1.50	1.50	$1,312.50
12/20/2017	Wash DPPA Swapp	hearing on MTD	$875.00 hr	0.50	0.50	$437.50
12/22/2017	Wash DPPA Swapp	review order denying MTD	$875.00 hr	0.40	0.40	$350.00
01/04/2018	Wash DPPA Swapp	review answer to complaint	$875.00 hr	0.50	0.50	$437.50
01/07/2018	Wash DPPA Swapp	review order re: scheduling conference	$875.00 hr	0.10	0.10	$87.50
01/15/2018	Wash DPPA Swapp	review/ edit JSR/ Rule 26(f) resp	$875.00 hr	1.00	1.00	$875.00
01/15/2018	Wash DPPA Swapp	edit letter re: motion to strike defenses	$875.00 hr	0.70	0.70	$612.50
01/16/2018	Wash DPPA Swapp	correspondence with T. Jarrard and T. Kirchofer re: letter re: affirmative defenses	$875.00 hr	0.20	0.20	$175.00
01/18/2018	Wash DPPA Swapp	edit plts 1st set of RFPs	$875.00 hr	1.40	1.40	$1,225.00
01/18/2018	Wash DPPA Swapp	review/ edit Joint Status / Rule 26(f) Report	$875.00 hr	0.50	0.50	$437.50

01/18/2018	Wash DPPA Swapp	correspondence with defendants re: Joint Status Report	$875.00 hr	0.20	0.20	$175.00
01/18/2018	Wash DPPA Swapp	edit plts 1st set of RFPs	$875.00 hr	1.50	1.50	$1,312.50
01/19/2018	Wash DPPA Swapp	edit Pls first set of RFPs	$875.00 hr	0.30	0.30	$262.50
01/19/2018	Wash DPPA Swapp	call with T. Kirchofer re: plts 1st RFPs	$875.00 hr	0.50	0.50	$437.50
01/19/2018	Wash DPPA Swapp	review order denying motion to ? in Batiste	$875.00 hr	0.50	0.50	$437.50
01/22/2018	Wash DPPA Swapp	correspondence with defendants re: scheduling trial date	$875.00 hr	0.20	0.20	$175.00
01/22/2018	Wash DPPA Swapp	edit stipulation re: Rule 12(f)	$875.00 hr	0.40	0.40	$350.00
01/22/2018	Wash DPPA Swapp	Rule 26(f) conference with defendants	$875.00 hr	0.50	0.50	$437.50
01/22/2018	Wash DPPA Swapp	call wtih T. Jarrard re: Rule 26(f) conference	$875.00 hr	0.50	0.50	$437.50
01/23/2018	Wash DPPA Swapp	edit plts 1st set of RFAs	$875.00 hr	1.00	1.00	$875.00
01/23/2018	Wash DPPA Swapp	call with T. Kirchofer re: 1st RFAs	$875.00 hr	0.20	0.20	$175.00
01/26/2018	Wash DPPA Swapp	edit JSR/ Rule 26 (f) report	$875.00 hr	0.60	0.60	$525.00
01/29/2018	Wash DPPA Swapp	edit Rule 26 (f) report, review defendants' edits and correspondence with T. Jarrard re: same	$875.00 hr	0.70	0.70	$612.50
01/29/2018	Wash DPPA Swapp	correspondence with defendants counsel re: Rule 26(f) report	$875.00 hr	0.20	0.20	$175.00
01/31/2018	Wash DPPA Swapp	review. edit plaintiffs 1st RFPs	$875.00 hr	0.40	0.40	$350.00
01/31/2018	Wash DPPA Swapp	review/ comment on defendants edits to Rule 26(f) report	$875.00 hr	0.50	0.50	$437.50
01/31/2018	Wash DPPA Swapp	review Rule 26(a) initial disclosure	$875.00 hr	0.30	0.30	$262.50
02/02/2018	Wash DPPA Swapp	review ? Rule 26(a) disclosure	$875.00 hr	0.10	0.10	$87.50
02/02/2018	Wash DPPA Swapp	call with T. Kirchofer re: 1st set of interrogs	$875.00 hr	0.60	0.60	$525.00
02/02/2018	Wash DPPA Swapp	edit Rule 26(b) motion to strike affirmative defenses	$875.00 hr	0.80	0.80	$700.00
02/05/2018	Wash DPPA Swapp	review defendants Rule 26(A) disclosures	$875.00 hr	0.40	0.40	$350.00
02/05/2018	Wash DPPA Swapp	correspondence with defendants counsel re: protective order	$875.00 hr	0.30	0.30	$262.50
02/06/2018	Wash DPPA Swapp	edit plts 1st of interrogs	$875.00 hr	1.00	1.00	$875.00
02/06/2018	Wash DPPA Swapp	call with T. Kirchofer re: discovery and protective order	$875.00 hr	0.40	0.40	$350.00
02/06/2018	Wash DPPA Swapp	edit plts 1st set of interrogs	$875.00 hr	1.40	1.40	$1,225.00
02/09/2018	Wash DPPA Swapp	review Plts 1st set of interrogs	$875.00 hr	0.30	0.30	$262.50
02/09/2018	Wash DPPA Swapp	review insurance policy docs	$875.00 hr	1.00	1.00	$875.00
02/10/2018	Wash DPPA Swapp	review analysis of insurance coverage	$875.00 hr	0.30	0.30	$262.50
02/12/2018	Wash DPPA Swapp	edit Rule 12(f) motion to strike	$875.00 hr	2.30	2.30	$2,012.50
02/12/2018	Wash DPPA Swapp	edit 1st set of Interrogatories	$875.00 hr	0.90	0.90	$787.50
02/12/2018	Wash DPPA Swapp	edit stipulated protective order	$875.00 hr	0.50	0.50	$437.50
02/12/2018	Wash DPPA Swapp	call with T. Jarrard re discovery	$875.00 hr	0.40	0.40	$350.00
02/12/2018	Wash DPPA Swapp	review 1st set of interrogs	$875.00 hr	0.30	0.30	$262.50
02/12/2018	Wash DPPA Swapp	correspondence re: oral argument with T. Jarrard	$875.00 hr	0.10	0.10	$87.50
02/13/2018	Wash DPPA Swapp	review final review of motion to strike	$875.00 hr	0.30	0.30	$262.50
02/14/2018	Wash DPPA Swapp	prep for Rule 16 conference	$875.00 hr	0.50	0.50	$437.50
02/14/2018	Wash DPPA Swapp	call with T. Jarrard and T. Kirchofer re: Rule 16 conference	$875.00 hr	0.20	0.20	$175.00
02/14/2018	Wash DPPA Swapp	Rule 16 conference	$875.00 hr	0.50	0.50	$437.50

02/14/2018	Wash DPPA Swapp	call with T. Jarrard re: Rule 16 conference	$875.00 hr	0.20	0.20	$175.00
02/14/2018	Wash DPPA Swapp	call with T. Kirchofer re: protective order	$875.00 hr	0.10	0.10	$87.50
02/23/2018	Wash DPPA Swapp	correspondence with B. Duffy re: request for extension on discovery	$875.00 hr	0.50	0.50	$437.50
02/27/2018	Wash DPPA Swapp	correspondence with T. Jarrard re: discovery extension and protective order	$875.00 hr	0.10	0.10	$87.50
02/27/2018	Wash DPPA Swapp	review defendants edits to protective order	$875.00 hr	0.30	0.30	$262.50
02/27/2018	Wash DPPA Swapp	review memo re: interview with ex-Swapp employee Britt	$875.00 hr	0.30	0.30	$262.50
02/27/2018	Wash DPPA Swapp	review defendants resp to motion to strike	$875.00 hr	0.30	0.30	$262.50
02/27/2018	Wash DPPA Swapp	call with T. Jarrard re: discovery	$875.00 hr	0.30	0.30	$262.50
03/01/2018	Wash DPPA Swapp	review of protective order - defendants edits and T. Jarrard edits	$875.00 hr	0.40	0.40	$350.00
03/02/2018	Wash DPPA Swapp	edit protective order	$875.00 hr	0.50	0.50	$437.50
03/02/2018	Wash DPPA Swapp	correspondence with B. Duffy re: extension on discovery	$875.00 hr	0.20	0.20	$175.00
03/02/2018	Wash DPPA Swapp	edit protective order and correspondence with defendants re: same	$875.00 hr	0.30	0.30	$262.50
03/05/2018	Wash DPPA Swapp	review/edit reply brief on motion to strike	$875.00 hr	0.50	0.50	$437.50
03/05/2018	Wash DPPA Swapp	edit reply on motion to strike	$875.00 hr	2.40	2.40	$2,100.00
03/06/2018	Wash DPPA Swapp	edit reply on motion to strike defendants defenses	$875.00 hr	1.90	1.90	$1,662.50
03/06/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: motion to strike defendant's defenses	$875.00 hr	0.10	0.10	$87.50
03/06/2018	Wash DPPA Swapp	edit motion to strike defendant's defenses	$875.00 hr	1.20	1.20	$1,050.00
03/07/2018	Wash DPPA Swapp	review defendants resp to 1st RFAs and 1st RFPs	$875.00 hr	9.90	9.90	$8,662.50
03/07/2018	Wash DPPA Swapp	correspondence with B. Duffy re: discovery and custodians and search terms	$875.00 hr	1.00	1.00	$875.00
03/07/2018	Wash DPPA Swapp	review Plts 2nd RFA	$875.00 hr	0.30	0.30	$262.50
03/07/2018	Wash DPPA Swapp	edit letter to defendants re: Rule 26(a) disclosures	$875.00 hr	0.80	0.80	$700.00
03/09/2018	Wash DPPA Swapp	review defendants letter re: search terms	$875.00 hr	0.30	0.30	$262.50
03/09/2018	Wash DPPA Swapp	call with T. Jarrard re: discovery and search terms	$875.00 hr	0.20	0.20	$175.00
03/09/2018	Wash DPPA Swapp	correspondence with B. Duffy re: confidentiality of docs	$875.00 hr	0.30	0.30	$262.50
03/09/2018	Wash DPPA Swapp	review defendants 1st RFPs and interrogs	$875.00 hr	0.80	0.80	$700.00
03/09/2018	Wash DPPA Swapp	call with T. Jarrard and T. Kirchofer re: defendants discovery and protective order	$875.00 hr	1.40	1.40	$1,225.00
03/09/2018	Wash DPPA Swapp	review defendants edits to protective order and edit same	$875.00 hr	1.00	1.00	$875.00
03/12/2018	Wash DPPA Swapp	review search terms	$875.00 hr	0.50	0.50	$437.50
03/12/2018	Wash DPPA Swapp	call with T. Kirchofer and T. Jarrard re: search terms	$875.00 hr	0.50	0.50	$437.50
03/12/2018	Wash DPPA Swapp	call with defendants re: search terms	$875.00 hr	0.50	0.50	$437.50
03/13/2018	Wash DPPA Swapp	review/edit email re: search terms for defendants discovery	$875.00 hr	1.30	1.30	$1,137.50
03/13/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: defendants position re: privilege of clients names	$875.00 hr	0.10	0.10	$87.50
03/13/2018	Wash DPPA Swapp	review of search terms and correspondence with T. Kirchofer re: same	$875.00 hr	0.30	0.30	$262.50
03/13/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: discovery of client names	$875.00 hr	0.10	0.10	$87.50
03/13/2018	Wash DPPA Swapp	review plts Rule 26(A) disclosure documents	$875.00 hr	1.00	1.00	$875.00
03/13/2018	Wash DPPA Swapp	review of Plt rule 26(a) documents to produce	$875.00 hr	0.80	0.80	$700.00
03/14/2018	Wash DPPA Swapp	review defendants letter re: search terms	$875.00 hr	0.10	0.10	$87.50
03/14/2018	Wash DPPA Swapp	call with T. Kirchofer re: search fees and discovery	$875.00 hr	0.50	0.50	$437.50

03/14/2018	Wash DPPA Swapp	review defendants changes to protective order	$875.00 hr	0.30	0.30	$262.50
03/14/2018	Wash DPPA Swapp	review proposed order re: class and correspondence with T. Jarrard re: same	$875.00 hr	0.40	0.40	$350.00
03/15/2018	Wash DPPA Swapp	correspondence with B. Duffy re: class certification	$875.00 hr	0.40	0.40	$350.00
03/15/2018	Wash DPPA Swapp	review defendants proposed search terms	$875.00 hr	0.50	0.50	$437.50
03/15/2018	Wash DPPA Swapp	review defendants resp to Plts 1st Interrogs	$875.00 hr	0.50	0.50	$437.50
03/15/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: defendants resp to 1st set of interrogs	$875.00 hr	0.20	0.20	$175.00
03/15/2018	Wash DPPA Swapp	correspondence with defendants re: class certification page limit	$875.00 hr	0.20	0.20	$175.00
03/15/2018	Wash DPPA Swapp	review defendants winning letter re: class certification schedule	$875.00 hr	0.20	0.20	$175.00
03/15/2018	Wash DPPA Swapp	correspondence with defendants re: class certification deadlines	$875.00 hr	0.80	0.80	$700.00
03/16/2018	Wash DPPA Swapp	review defendants search term results	$875.00 hr	0.30	0.30	$262.50
03/19/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: defendants production	$875.00 hr	0.10	0.10	$87.50
03/20/2018	Wash DPPA Swapp	review defendants edit to proposed protective order and motion	$875.00 hr	0.20	0.20	$175.00
03/21/2018	Wash DPPA Swapp	review emails from and to defendants re: discovery	$875.00 hr	1.00	1.00	$875.00
03/22/2018	Wash DPPA Swapp	correspondence with T. Jarrard and J. Sweetser re: status	$875.00 hr	0.10	0.10	$87.50
03/22/2018	Wash DPPA Swapp	review draft letter to defendants counsel re: resp to Interrogs and call with T. Kirchofer re: same	$875.00 hr	0.30	0.30	$262.50
03/23/2018	Wash DPPA Swapp	review correspondence from M. Siegel re: discovery and production and respond thereto	$875.00 hr	0.20	0.20	$175.00
03/23/2018	Wash DPPA Swapp	call with T. Kirchofer re: discovery and search terms	$875.00 hr	0.50	0.50	$437.50
03/23/2018	Wash DPPA Swapp	correspondence with Plts counsel re: strategies	$875.00 hr	0.10	0.10	$87.50
03/23/2018	Wash DPPA Swapp	edit letter to defendants re: defendants interogs and RFPs	$875.00 hr	1.10	1.10	$962.50
03/26/2018	Wash DPPA Swapp	review revised search terms	$875.00 hr	0.20	0.20	$175.00
03/26/2018	Wash DPPA Swapp	call with T. Kirchofer re: defendants resp to interrogs and RFPs	$875.00 hr	0.40	0.40	$350.00
03/26/2018	Wash DPPA Swapp	edit letter to defendants re: discovery	$875.00 hr	0.30	0.30	$262.50
03/26/2018	Wash DPPA Swapp	review summary of call with defendants re: search term	$875.00 hr	0.20	0.20	$175.00
03/28/2018	Wash DPPA Swapp	edit Plts resp to defendants interrogs	$875.00 hr	1.10	1.10	$962.50
03/28/2018	Wash DPPA Swapp	review defendants response to defendants 1st RFPs	$875.00 hr	0.20	0.20	$175.00
03/28/2018	Wash DPPA Swapp	review revised defendants response to defendants interrogatories and call with T. Kirchofer re: same	$875.00 hr	0.30	0.30	$262.50
04/02/2018	Wash DPPA Swapp	review defendants letter response to plts letter re: defendants resp to 1st set of interrogs, RFPs, initial disclosures and response	$875.00 hr	0.70	0.70	$612.50
04/04/2018	Wash DPPA Swapp	edit Plts resp to defendants 1st set of interrogs	$875.00 hr	0.50	0.50	$437.50
04/05/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: Swapp production	$875.00 hr	0.20	0.20	$175.00
04/06/2018	Wash DPPA Swapp	review/ edit Plts resp to defendants 1st RFPs	$875.00 hr	2.00	2.00	$1,750.00
04/06/2018	Wash DPPA Swapp	review/ edit defendants response to defendants 1st RFPs	$875.00 hr	0.50	0.50	$437.50
04/06/2018	Wash DPPA Swapp	call with defendants re: meet and confer on defendants resp to 1st interrogs, 1st RFP and initial disclosure	$875.00 hr	0.70	0.70	$612.50
04/07/2018	Wash DPPA Swapp	review Plts resp to 1st set of defendants	$875.00 hr	0.20	0.20	$175.00

04/07/2018	Wash DPPA Swapp	review defendants response to Plts 2nd set of RFAs	$875.00 hr	0.20	0.20	$175.00
04/11/2018	Wash DPPA Swapp	review memo re: T. Kirchofer conversation with ex-employee K. Britt and correspondence with re: same	$875.00 hr	0.40	0.40	$350.00
04/13/2018	Wash DPPA Swapp	review defendants letter	$875.00 hr	0.30	0.30	$262.50
04/18/2018	Wash DPPA Swapp	call with defendants re: meet and confer re defendants interrogatories and RFPs	$875.00 hr	1.10	1.10	$962.50
04/18/2018	Wash DPPA Swapp	call with T. Jarrad re: settlement	$875.00 hr	0.50	0.50	$437.50
04/23/2018	Wash DPPA Swapp	call with defendants counsel re: meet and confer with defendants	$875.00 hr	0.80	0.80	$700.00
04/23/2018	Wash DPPA Swapp	prep for call with defendants call with defendants re: discovery	$875.00 hr	0.80	0.80	$700.00
04/23/2018	Wash DPPA Swapp	call with defendants re: discovery	$875.00 hr	1.00	1.00	$875.00
04/24/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: mediation	$875.00 hr	0.10	0.10	$87.50
04/24/2018	Wash DPPA Swapp	call with T. Kirchofer re: discovery	$875.00 hr	0.30	0.30	$262.50
04/24/2018	Wash DPPA Swapp	review materials re: std accident reports	$875.00 hr	0.40	0.40	$350.00
04/24/2018	Wash DPPA Swapp	call with M. Sweester and T. Kirchofer re: discovery	$875.00 hr	0.40	0.40	$350.00
04/26/2018	Wash DPPA Swapp	review proposed discovery	$875.00 hr	0.50	0.50	$437.50
04/27/2018	Wash DPPA Swapp	review order on motion to strike defendants affirmative defenses	$875.00 hr	0.40	0.40	$350.00
04/27/2018	Wash DPPA Swapp	call with T. Kirchofer re: letter to B. Duffy	$875.00 hr	0.60	0.60	$525.00
04/30/2018	Wash DPPA Swapp	edit letter to defendants re: plts discovery	$875.00 hr	1.00	1.00	$875.00
04/30/2018	Wash DPPA Swapp	edit letter to defendants re: plts discovery	$875.00 hr	0.50	0.50	$437.50
05/01/2018	Wash DPPA Swapp	edit letter to defendants re: discovery	$875.00 hr	0.40	0.40	$350.00
05/02/2018	Wash DPPA Swapp	call with T. Kirchofer re: discovery	$875.00 hr	0.80	0.80	$700.00
05/02/2018	Wash DPPA Swapp	call with T. Kirchofer re: discovery	$875.00 hr	0.70	0.70	$612.50
05/03/2018	Wash DPPA Swapp	edit settlement demand	$875.00 hr	0.70	0.70	$612.50
05/03/2018	Wash DPPA Swapp	review/ edit settlement demand	$875.00 hr	0.30	0.30	$262.50
05/04/2018	Wash DPPA Swapp	edit correspondence with defendants re: discovery	$875.00 hr	0.20	0.20	$175.00
05/09/2018	Wash DPPA Swapp	edit subpoena to WSP	$875.00 hr	0.50	0.50	$437.50
05/09/2018	Wash DPPA Swapp	review defendants 2nd amended answer	$875.00 hr	0.40	0.40	$350.00
05/10/2018	Wash DPPA Swapp	edit subpoena to WSP	$875.00 hr	0.50	0.50	$437.50
05/10/2018	Wash DPPA Swapp	edit joint motion to extend class cert deadline	$875.00 hr	0.50	0.50	$437.50
05/11/2018	Wash DPPA Swapp	correspondence with B. Duffy re: extended class cert deadlines	$875.00 hr	0.20	0.20	$175.00
05/11/2018	Wash DPPA Swapp	finalize settlement demand	$875.00 hr	0.30	0.30	$262.50
05/13/2018	Wash DPPA Swapp	draft stipulation re: class cert	$875.00 hr	1.00	1.00	$875.00
05/14/2018	Wash DPPA Swapp	correspondence with T. Jarrard re: motion for extension on class cert	$875.00 hr	0.10	0.10	$87.50
05/18/2018	Wash DPPA Swapp	correspondence with R. McBride re: subpoena to Sweester	$875.00 hr	0.10	0.10	$87.50
05/22/2018	Wash DPPA Swapp	review subpoena to Sweetser	$875.00 hr	0.30	0.30	$262.50
05/22/2018	Wash DPPA Swapp	correspondence with R. McBride re: subpoena on Sweetser	$875.00 hr	0.20	0.20	$175.00
05/23/2018	Wash DPPA Swapp	edit motion to compel defendants interrogs resp	$875.00 hr	0.80	0.80	$700.00
05/24/2018	Wash DPPA Swapp	review/ edit letter to defendants re: discovery	$875.00 hr	0.70	0.70	$612.50
05/24/2018	Wash DPPA Swapp	review/ comment on motion to compel	$875.00 hr	0.50	0.50	$437.50
05/31/2018	Wash DPPA Swapp	correspondence with B. Duffy re: settlement	$875.00 hr	0.10	0.10	$87.50

05/31/2018	Wash DPPA Swapp	call with B. Duffy re: settlement	$875.00 hr	0.50	0.50	$437.50
06/02/2018	Wash DPPA Swapp	Review defendants privilege log	$875.00 hr	1.00	1.00	$875.00
06/02/2018	Wash DPPA Swapp	Review defendants supplemental Rule 26(a) disclosures	$875.00 hr	0.50	0.50	$437.50
06/03/2018	Wash DPPA Swapp	Review 5/29/18 letter from B. Duffy	$875.00 hr	0.20	0.20	$175.00
06/03/2018	Wash DPPA Swapp	Correspondence w/ T. Kirchofer re May 30 letter from B. Duffy	$875.00 hr	0.10	0.10	$87.50
06/05/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: Sweetser subpoena	$875.00 hr	0.10	0.10	$87.50
06/06/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: CJTC subpoena	$875.00 hr	0.10	0.10	$87.50
06/06/2018	Wash DPPA Swapp	correspondence with B. Duffy re: depositions	$875.00 hr	0.30	0.30	$262.50
06/06/2018	Wash DPPA Swapp	call with T. Kirchofer re: Rule 30(b)(6)	$875.00 hr	1.00	1.00	$875.00
06/06/2018	Wash DPPA Swapp	correspondence with B. Duffy re: depositions	$875.00 hr	0.30	0.30	$262.50
06/06/2018	Wash DPPA Swapp	review objections to defendants subpoena on Sweetser	$875.00 hr	0.30	0.30	$262.50
06/07/2018	Wash DPPA Swapp	Correspondence w/ T. Kirchofer re Rule 30(b) (6) deposition	$875.00 hr	0.10	0.10	$87.50
06/07/2018	Wash DPPA Swapp	Review Batiste expert designations	$875.00 hr	0.20	0.20	$175.00
06/07/2018	Wash DPPA Swapp	Correspondence w/ T Jarrard re objections to subpoena to Swapp	$875.00 hr	0.30	0.30	$262.50
06/07/2018	Wash DPPA Swapp	Correspondence w/ B. Duffy re depositions	$875.00 hr	0.40	0.40	$350.00
06/07/2018	Wash DPPA Swapp	Correspondence w/ J. Block re subpoena to WSP	$875.00 hr	0.30	0.30	$262.50
06/07/2018	Wash DPPA Swapp	Edit Rule 30 (b)(G) deposition topics for WSP	$875.00 hr	0.80	0.80	$700.00
06/08/2018	Wash DPPA Swapp	Correspondence w/ S. Williams re WSP deposition& correspond w/ t. Kirchofer re same	$875.00 hr	0.20	0.20	$175.00
06/08/2018	Wash DPPA Swapp	Edit Rule 30 (b) (6) depositions for WSP	$875.00 hr	0.40	0.40	$350.00
06/08/2018	Wash DPPA Swapp	Edit notice for WSP Rule 30 (b)(6) depostion	$875.00 hr	0.20	0.20	$175.00
06/12/2018	Wash DPPA Swapp	call with T. Kirchofer re: discovery	$875.00 hr	0.40	0.40	$350.00
06/12/2018	Wash DPPA Swapp	correspondence with B. Duffy re: depo locations	$875.00 hr	0.10	0.10	$87.50
06/12/2018	Wash DPPA Swapp	correspondence with B. Duffy re: depo location	$875.00 hr	0.30	0.30	$262.50
06/12/2018	Wash DPPA Swapp	review defendants 6/11/18 letter	$875.00 hr	0.20	0.20	$175.00
06/13/2018	Wash DPPA Swapp	correspondence with B. Duffy re: WSP Rule 30(b)(6)	$875.00 hr	0.50	0.50	$437.50
06/13/2018	Wash DPPA Swapp	call with T. Kirchofer	$875.00 hr	0.30	0.30	$262.50
06/13/2018	Wash DPPA Swapp	correspondence with T. Jarrard re: Wilcox docs	$875.00 hr	0.10	0.10	$87.50
06/14/2018	Wash DPPA Swapp	edit letter to B. Duffy re: discovery	$875.00 hr	0.50	0.50	$437.50
06/15/2018	Wash DPPA Swapp	correspondence with S. Williams at WSP re: Rule 30 (b)(6) depo	$875.00 hr	0.50	0.50	$437.50
06/15/2018	Wash DPPA Swapp	correspondence with B. Duffy re: depositions	$875.00 hr	0.80	0.80	$700.00
06/15/2018	Wash DPPA Swapp	review WSP resp to 1st RFP and interrogations in Batiste	$875.00 hr	0.30	0.30	$262.50
06/15/2018	Wash DPPA Swapp	correspondence with B. Duffy re: depositions	$875.00 hr	0.20	0.20	$175.00
06/15/2018	Wash DPPA Swapp	correspondence with S. Williams re: WSP Rule 30(b0(6) deposition	$875.00 hr	0.20	0.20	$175.00
06/18/2018	Wash DPPA Swapp	deposition of WSP - Part I (Gibbs)	$875.00 hr	4.00	4.00	$3,500.00
06/18/2018	Wash DPPA Swapp	Deposition of WSP - Part II (Morhause)	$875.00 hr	4.30	4.30	$3,762.50
06/19/2018	Wash DPPA Swapp	correspondence with T. Jarrard re: Wilcox prep	$875.00 hr	0.10	0.10	$87.50
06/20/2018	Wash DPPA Swapp	review/ edit resp to Interrogs	$875.00 hr	0.80	0.80	$700.00
06/20/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: CJTC subpoena	$875.00 hr	0.10	0.10	$87.50

06/20/2018	Wash DPPA Swapp	prep for Wilcox depo prep	$875.00 hr	0.20	0.20	$175.00
06/20/2018	Wash DPPA Swapp	prep for Wilcox depo prep	$875.00 hr	0.80	0.80	$700.00
06/20/2018	Wash DPPA Swapp	travel to Wilcox depo prep (not billed elsewhere)	$875.00 hr	1.30	1.30	$1,137.50
06/21/2018	Wash DPPA Swapp	review opp to motion to compel interrogs	$875.00 hr	0.20	0.20	$175.00
06/21/2018	Wash DPPA Swapp	review/ draft subpoena to CJTC	$875.00 hr	0.30	0.30	$262.50
06/21/2018	Wash DPPA Swapp	review docs to prep for Wilcox depo prep	$875.00 hr	0.50	0.50	$437.50
06/21/2018	Wash DPPA Swapp	review docs to prep for Wilcox depo prep	$875.00 hr	2.00	2.00	$1,750.00
06/21/2018	Wash DPPA Swapp	review docs to prep for Wilcox depo prep	$875.00 hr	1.00	1.00	$875.00
06/21/2018	Wash DPPA Swapp	meet with J. Wilcox to prep for depo	$875.00 hr	4.00	4.00	$3,500.00
06/22/2018	Wash DPPA Swapp	return travel from Wilcox depo prep (not billed elsewhere)	$875.00 hr	3.00	3.00	$2,625.00
06/22/2018	Wash DPPA Swapp	correspondence with B. Duffy re: deposition availability	$875.00 hr	0.10	0.10	$87.50
06/22/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: WSP testimony	$875.00 hr	0.90	0.90	$787.50
06/22/2018	Wash DPPA Swapp	Call T. Jarrard re: Wilcox depo	$875.00 hr	0.20	0.20	$175.00
06/24/2018	Wash DPPA Swapp	review and respond to letter from WSP atty re: Rule 30(b)(6) deposition	$875.00 hr	0.40	0.40	$350.00
06/24/2018	Wash DPPA Swapp	correspondence with B. Duffy re: resp to Plts interrogs	$875.00 hr	0.10	0.10	$87.50
06/24/2018	Wash DPPA Swapp	review draft on motion to compel	$875.00 hr	0.30	0.30	$262.50
06/25/2018	Wash DPPA Swapp	review/ edit subpoena for Rule 30(b)(6) depo to CJTC	$875.00 hr	0.30	0.30	$262.50
06/25/2018	Wash DPPA Swapp	review/ comment on reply on motion to compel	$875.00 hr	1.20	1.20	$1,050.00
06/26/2018	Wash DPPA Swapp	Review Spokane PD procedure	$875.00 hr	0.50	0.50	$437.50
06/27/2018	Wash DPPA Swapp	Edit reply brief on motion to compel interrogatories.	$875.00 hr	0.50	0.50	$437.50
06/27/2018	Wash DPPA Swapp	Correspondence w. J. Kirchofer re: Spokane PD depostion	$875.00 hr	0.20	0.20	$175.00
06/27/2018	Wash DPPA Swapp	Correspondence w/ Sweetsens and J.Janel re defendants proposal re: redacted documents	$875.00 hr	0.20	0.20	$175.00
06/27/2018	Wash DPPA Swapp	Edit letter to B.Duffy re: interrogatories.	$875.00 hr	0.40	0.40	$350.00
07/01/2018	Wash DPPA Swapp	Travel to Rule 30 (b) (6) depostion w/ WSP (not billed elsewhere)	$875.00 hr	1.50	1.50	$1,312.50
07/01/2018	Wash DPPA Swapp	Travel to deposition (not billed elsewhere)	$875.00 hr	1.50	1.50	$1,312.50
07/01/2018	Wash DPPA Swapp	Travel to and prepare for deposition of WSP	$875.00 hr	4.50	4.50	$3,937.50
07/01/2018	Wash DPPA Swapp	Review materials for Rule 30(b)(6) depostion w/ WSP	$875.00 hr	1.00	1.00	$875.00
07/01/2018	Wash DPPA Swapp	Travel to Rule 30(b)(6) deposition (not billed elsewhere)	$875.00 hr	1.50	1.50	$1,312.50
07/01/2018	Wash DPPA Swapp	Travel to deposition of WSP (not billed elsewhere)	$875.00 hr	1.50	1.50	$1,312.50
07/02/2018	Wash DPPA Swapp	Rule 30(b)(6) Deposition for WSP	$875.00 hr	4.00	4.00	$3,500.00
07/02/2018	Wash DPPA Swapp	review/ edit motion to compel Interrogs No. 2-4	$875.00 hr	0.40	0.40	$350.00
07/02/2018	Wash DPPA Swapp	Rule 30(b)(6) Deposition of WSP	$875.00 hr	4.00	4.00	$3,500.00
07/03/2018	Wash DPPA Swapp	Review/edit letter to defendants re reduced documents	$875.00 hr	0.30	0.30	$262.50
07/03/2018	Wash DPPA Swapp	Review letter to WSP re 30(6) (G) topics	$875.00 hr	0.30	0.30	$262.50
07/06/2018	Wash DPPA Swapp	Review defendants 7/06/18 letter re discovery	$875.00 hr	0.30	0.30	$262.50
07/08/2018	Wash DPPA Swapp	Review defendants letter re: interregatory response	$875.00 hr	0.20	0.20	$175.00

07/17/2018	Wash DPPA Swapp	correspodence with T. Jarrard re: defendants proposal re redacted docs	$875.00 hr	0.10	0.10	$87.50
07/17/2018	Wash DPPA Swapp	review defendants opp to motion to compel Interog Nos 2-4	$875.00 hr	0.50	0.50	$437.50
07/18/2018	Wash DPPA Swapp	review defendants 2nd supplemental resp to plts 1st set of Interrogs	$875.00 hr	0.50	0.50	$437.50
07/18/2018	Wash DPPA Swapp	correspondence with B. Duffy re: resp to Interrogs	$875.00 hr	0.10	0.10	$87.50
07/18/2018	Wash DPPA Swapp	review class cert brief and comment thereon	$875.00 hr	0.80	0.80	$700.00
07/19/2018	Wash DPPA Swapp	call with T. Kirchofer re: CJTC subpoena	$875.00 hr	0.60	0.60	$525.00
07/19/2018	Wash DPPA Swapp	review timeline re: CJTC re: deposition	$875.00 hr	0.20	0.20	$175.00
07/20/2018	Wash DPPA Swapp	call with T. Kirchofer re: class cert	$875.00 hr	0.10	0.10	$87.50
07/20/2018	Wash DPPA Swapp	edit motion for extension (opposed) on reply on motion to compel	$875.00 hr	0.60	0.60	$525.00
07/24/2018	Wash DPPA Swapp	correspondence with B. Duffy re: redacted documents	$875.00 hr	0.40	0.40	$350.00
07/24/2018	Wash DPPA Swapp	correspondence with T. Kirchofer re: Amended Complaint	$875.00 hr	0.20	0.20	$175.00
07/24/2018	Wash DPPA Swapp	prep for DOL depo	$875.00 hr	1.20	1.20	$1,050.00
07/24/2018	Wash DPPA Swapp	review and comment on draft class cert brief	$875.00 hr	0.80	0.80	$700.00
07/26/2018	Wash DPPA Swapp	review defendants correspondence re: Sweetser subpoena and correspondence with T. Jarrard and M. Love re: same	$875.00 hr	0.30	0.30	$262.50
07/26/2018	Wash DPPA Swapp	review newly produced PTCR presentation	$875.00 hr	0.30	0.30	$262.50
07/26/2018	Wash DPPA Swapp	correspondence with S. Williams re: Rule 30(b)(6) ?	$875.00 hr	0.10	0.10	$87.50
07/26/2018	Wash DPPA Swapp	prep for CJTC depo	$875.00 hr	0.90	0.90	$787.50
07/26/2018	Wash DPPA Swapp	correspondence with ? re: Rule 30(b)(6) depo	$875.00 hr	0.30	0.30	$262.50
07/26/2018	Wash DPPA Swapp	prep for CJTC depo	$875.00 hr	1.80	1.80	$1,575.00
07/27/2018	Wash DPPA Swapp	prep for CJTC depo	$875.00 hr	3.20	3.20	$2,800.00
07/27/2018	Wash DPPA Swapp	Rule 30(b)(6) depo of CJTC	$875.00 hr	4.50	4.50	$3,937.50
07/29/2018	Wash DPPA Swapp	Prepare for Rule 30 (b)(6) deposition of DOL	$875.00 hr	2.50	2.50	$2,187.50
07/30/2018	Wash DPPA Swapp	Prepare for Rule 30(b)(6) deposition of DOL	$875.00 hr	3.00	3.00	$2,625.00
07/30/2018	Wash DPPA Swapp	Correspondence w/ T. Kirchofer re defendants response to motion to compel.	$875.00 hr	0.10	0.10	$87.50
07/30/2018	Wash DPPA Swapp	Correspondence w/ T. Kirchofer re: class certification briefing	$875.00 hr	0.30	0.30	$262.50
07/30/2018	Wash DPPA Swapp	Deposition of DOL	$875.00 hr	11.00	11.00	$9,625.00
07/30/2018	Wash DPPA Swapp	Calls w/ T. Jarrard & T. Kirchofer re DOL depositions	$875.00 hr	0.50	0.50	$437.50
07/30/2018	Wash DPPA Swapp	Return travel to Seattle from DOL deposition	$875.00 hr	1.50	1.50	$1,312.50
07/31/2018	Wash DPPA Swapp	Edit reply on 2nd motion to compel first interrogatories	$875.00 hr	0.50	0.50	$437.50
07/31/2018	Wash DPPA Swapp	Correspondence w/ T. Jarrard re Spokane PD deposition	$875.00 hr	0.20	0.20	$175.00
07/31/2018	Wash DPPA Swapp	Return travel from DOL deposition (not billed elsewhere)	$875.00 hr	2.00	2.00	$1,750.00
07/31/2018	Wash DPPA Swapp	Edit Wilcox declaration re class	$875.00 hr	0.90	0.90	$787.50
07/31/2018	Wash DPPA Swapp	Review changes to 30(b)(6) deposition	$875.00 hr	0.10	0.10	$87.50
07/31/2018	Wash DPPA Swapp	Return travel from deposition (not billed elsewhere)	$875.00 hr	1.00	1.00	$875.00
08/01/2018	Wash DPPA Swapp	Review/edit amended complaint	$875.00 hr	1.00	1.00	$875.00
08/01/2018	Wash DPPA Swapp	Revise/edit amended complaint	$875.00 hr	1.20	1.20	$1,050.00
08/01/2018	Wash DPPA Swapp	Edit amended complaint	$875.00 hr	0.60	0.60	$525.00
08/02/2018	Wash DPPA Swapp	Edit brief in support of class certification	$875.00 hr	2.30	2.30	$2,012.50

08/02/2018	Wash DPPA Swapp	Correspondence w/ T. Kirchofer re motion to amend complaint	$875.00 hr	0.10	0.10	$87.50
08/02/2018	Wash DPPA Swapp	Edit brief in support of class certification	$875.00 hr	0.50	0.50	$437.50
08/02/2018	Wash DPPA Swapp	Edit brief in support of class certification	$875.00 hr	1.00	1.00	$875.00
08/03/2018	Wash DPPA Swapp	Review deposition of Spokane PD deposition.	$875.00 hr	0.60	0.60	$525.00
08/03/2018	Wash DPPA Swapp	Edit index of exhibits to class certification motion	$875.00 hr	0.60	0.60	$525.00
08/04/2018	Wash DPPA Swapp	Edit class certification brief	$875.00 hr	1.90	1.90	$1,662.50
08/04/2018	Wash DPPA Swapp	Edit class certification brief	$875.00 hr	2.00	2.00	$1,750.00
08/05/2018	Wash DPPA Swapp	Edit class certification brief	$875.00 hr	2.00	2.00	$1,750.00
08/06/2018	Wash DPPA Swapp	edit class certification brief	$875.00 hr	0.90	0.90	$787.50
08/06/2018	Wash DPPA Swapp	Review/edit motion to amend complaint	$875.00 hr	1.00	1.00	$875.00
08/06/2018	Wash DPPA Swapp	Review and respond to complaint re: class certification brief from T. Kirchofer & M. Siegel,	$875.00 hr	0.50	0.50	$437.50
08/06/2018	Wash DPPA Swapp	Review declaration in support of motion to amend complaint and class certification.	$875.00 hr	0.50	0.50	$437.50
08/07/2018	Wash DPPA Swapp	Review and comment on brief on class certification	$875.00 hr	0.40	0.40	$350.00
08/07/2018	Wash DPPA Swapp	Review and edit motion to amend complaint	$875.00 hr	0.50	0.50	$437.50
08/07/2018	Wash DPPA Swapp	Correspondence w/ T. Jarrard re: hearing on motion on 8/30	$875.00 hr	0.10	0.10	$87.50
08/07/2018	Wash DPPA Swapp	Correspondence w D. Kirchofer & T. Jarrard re: Duffy response to amended complaint	$875.00 hr	0.10	0.10	$87.50
08/08/2018	Wash DPPA Swapp	Correspondence w/ defendants re: amended complaint	$875.00 hr	0.60	0.60	$525.00
08/13/2018	Wash DPPA Swapp	Correspondence w/ B. Duffy re stipulation of amended complaints	$875.00 hr	0.40	0.40	$350.00
08/14/2018	Wash DPPA Swapp	Call w/ R. Kirchofer re: discrepancy	$875.00 hr	0.10	0.10	$87.50
08/14/2018	Wash DPPA Swapp	Edit stipulation re amended complaints	$875.00 hr	0.40	0.40	$350.00
08/15/2018	Wash DPPA Swapp	Edit stipulation re: amended complaint and correspond w/ defendants re: same	$875.00 hr	0.80	0.80	$700.00
08/15/2018	Wash DPPA Swapp	Correspondence w/ T. Jarrard and B. Duffy re stipulation re amended complaint	$875.00 hr	0.10	0.10	$87.50
08/15/2018	Wash DPPA Swapp	Call w/ T. Kirchofer re: discrepancy	$875.00 hr	0.50	0.50	$437.50
08/17/2018	Wash DPPA Swapp	Review order on motion to compel.	$875.00 hr	0.40	0.40	$350.00
08/21/2018	Wash DPPA Swapp	Correspondence w/ T Kirchofer re: various followup re: discrepancy	$875.00 hr	0.40	0.40	$350.00
08/22/2018	Wash DPPA Swapp	Correspondence w/ T. Kirchofer re status	$875.00 hr	0.30	0.30	$262.50
08/23/2018	Wash DPPA Swapp	Call w/ T. Kirchifer & M. Smith re case	$875.00 hr	0.40	0.40	$350.00
08/23/2018	Wash DPPA Swapp	review memo re deposition errata	$875.00 hr	2.00	2.00	$1,750.00
08/24/2018	Wash DPPA Swapp	Review research on changed deposition errata	$875.00 hr	0.20	0.20	$175.00
08/31/2018	Wash DPPA Swapp	Review correspondence from T. Jarrard re hearing on sanction on motion to compel.	$875.00 hr	0.10	0.10	$87.50
08/31/2018	Wash DPPA Swapp	Review minute notes of hearing on motion for sanctions on motion to compel	$875.00 hr	0.10	0.10	$87.50
09/07/2018	Wash DPPA Swapp	Correspondence w/ M. Smith re meet and confer w/ defendants	$875.00 hr	0.30	0.30	$262.50
09/11/2018	Wash DPPA Swapp	Review defendants motion to compel Sweetser	$875.00 hr	0.70	0.70	$612.50
09/12/2018	Wash DPPA Swapp	Review order on motion to compel	$875.00 hr	0.30	0.30	$262.50
09/12/2018	Wash DPPA Swapp	Review defendants MTD amended complaint	$875.00 hr	0.40	0.40	$350.00

09/17/2018	Wash DPPA Swapp	Correspondence w/ T. Jarrard and B, Duffy re: overall goal on MTD and classification	$875.00 hr	0.20	0.20	$175.00
09/17/2018	Wash DPPA Swapp	Call w/ M. Smith re redacted docs	$875.00 hr	0.20	0.20	$175.00
09/17/2018	Wash DPPA Swapp	Call w/ M. Smith re resolution of discovery dispute over redacted documents	$875.00 hr	0.20	0.20	$175.00
09/18/2018	Wash DPPA Swapp	Call w/ M. Smith re redacted docs	$875.00 hr	0.20	0.20	$175.00
09/18/2018	Wash DPPA Swapp	Correspondence w/ M Smith re redacted docs	$875.00 hr	0.20	0.20	$175.00
09/19/2018	Wash DPPA Swapp	Call w/ B. Swapp re: discovery	$875.00 hr	0.40	0.40	$350.00
09/19/2018	Wash DPPA Swapp	Call w/ T. Jarrard re discovery	$875.00 hr	0.50	0.50	$437.50
09/19/2018	Wash DPPA Swapp	Review/edit stipulation re: redacted docs	$875.00 hr	0.70	0.70	$612.50
09/20/2018	Wash DPPA Swapp	Edit stipulation re redacted docs	$875.00 hr	0.60	0.60	$525.00
09/20/2018	Wash DPPA Swapp	Correspondence w/ T. Jarrard re punitive discrepancy	$875.00 hr	0.10	0.10	$87.50
09/20/2018	Wash DPPA Swapp	Call w/ M. Smith re stipulation re unredacted documents	$875.00 hr	0.30	0.30	$262.50
09/20/2018	Wash DPPA Swapp	Review of draft RFPs re: punitive damages	$875.00 hr	0.30	0.30	$262.50
09/21/2018	Wash DPPA Swapp	Correspondence w/ T. Jarrard re discrepancy from defendants re punitive damages	$875.00 hr	0.20	0.20	$175.00
09/21/2018	Wash DPPA Swapp	Correspondence w/ T. Jarrard re discrepancy re punitives	$875.00 hr	0.10	0.10	$87.50
09/23/2018	Wash DPPA Swapp	Review defendants MTD and draft opposition to MTD	$875.00 hr	1.00	1.00	$875.00
09/24/2018	Wash DPPA Swapp	Review briefing on proposed MTD for opposition to defendant 2nd MTD	$875.00 hr	1.00	1.00	$875.00
09/24/2018	Wash DPPA Swapp	Review defendants 2nd supplemental Rule 26(a) disclosures	$875.00 hr	0.40	0.40	$350.00
09/26/2018	Wash DPPA Swapp	Edit stipulation re redacted claims	$875.00 hr	1.00	1.00	$875.00
09/27/2018	Wash DPPA Swapp	Edit opposition to MTD	$875.00 hr	6.00	6.00	$5,250.00
09/28/2018	Wash DPPA Swapp	Edit opposition to MTD	$875.00 hr	1.20	1.20	$1,050.00
09/28/2018	Wash DPPA Swapp	Edit opposition to MTD	$875.00 hr	1.20	1.20	$1,050.00
09/28/2018	Wash DPPA Swapp	Edit opposition to MTD	$875.00 hr	1.90	1.90	$1,662.50
10/02/2018	Wash DPPA Swapp	Discuss w/ C. Downes re defendant opposition to class certification	$875.00 hr	0.80	0.80	$700.00
10/02/2018	Wash DPPA Swapp	Review/edit final opposition to 2nd MTD	$875.00 hr	0.70	0.70	$612.50
10/03/2018	Wash DPPA Swapp	Review reply memo on motion to compel Sweetser	$875.00 hr	0.30	0.30	$262.50
10/03/2018	Wash DPPA Swapp	Review/Edit final opposition to MTD amended complaint	$875.00 hr	0.50	0.50	$437.50
10/15/2018	Wash DPPA Swapp	Correspondence w/ B. Duffy re: stay of discovery	$875.00 hr	0.20	0.20	$175.00
10/15/2018	Wash DPPA Swapp	Correspndence w/ B. Duffy re: stay	$875.00 hr	0.10	0.10	$87.50
10/16/2018	Wash DPPA Swapp	Correspondence w/ B. Duffy re: stipulation re: Quick Peek Document?	$875.00 hr	0.20	0.20	$175.00
10/22/2018	Wash DPPA Swapp	Correspondence w/ B. Duffy re: stipulation on redacted documents and stay of discrepancy	$875.00 hr	0.30	0.30	$262.50
10/26/2018	Wash DPPA Swapp	Review draft class certification reply	$875.00 hr	0.70	0.70	$612.50
10/31/2018	Wash DPPA Swapp	Edit reply brief on class certification	$875.00 hr	1.70	1.70	$1,487.50
10/31/2018	Wash DPPA Swapp	Edit reply brief on class certification	$875.00 hr	1.50	1.50	$1,312.50
10/31/2018	Wash DPPA Swapp	Edit reply brief on class certification	$875.00 hr	0.50	0.50	$437.50
10/31/2018	Wash DPPA Swapp	Edit reply brief on class certification	$875.00 hr	4.00	4.00	$3,500.00
10/31/2018	Wash DPPA Swapp	Edit reply brief on class certification	$875.00 hr	0.50	0.50	$437.50

11/19/2018	Wash DPPA Swapp	Prepare for hearing on MTD amended complaint	$875.00 hr	3.00	3.00	$2,625.00
11/19/2018	Wash DPPA Swapp	Prepare for hearing on MTD amended complaint	$875.00 hr	3.80	3.80	$3,325.00
11/20/2018	Wash DPPA Swapp	Prepare for hearing on MTD	$875.00 hr	2.50	2.50	$2,187.50
11/20/2018	Wash DPPA Swapp	Prepare for argument on MTD	$875.00 hr	2.80	2.80	$2,450.00
11/20/2018	Wash DPPA Swapp	Hearing on MTD	$875.00 hr	1.30	1.30	$1,137.50
12/06/2018	Wash DPPA Swapp	Review order denying defendant motion to compel Sweetser	$875.00 hr	0.20	0.20	$175.00
12/08/2018	Wash DPPA Swapp	Correspondence w/ M. Love re: order on motion to compel	$875.00 hr	0.10	0.10	$87.50
12/08/2018	Wash DPPA Swapp	Prepare for class certification hearing	$875.00 hr	4.00	4.00	$3,500.00
12/09/2018	Wash DPPA Swapp	Prepare for class certification hearing	$875.00 hr	3.00	3.00	$2,625.00
12/10/2018	Wash DPPA Swapp	Review materials for class certification hearing	$875.00 hr	1.80	1.80	$1,575.00
12/11/2018	Wash DPPA Swapp	Prepare for class certification hearing	$875.00 hr	3.00	3.00	$2,625.00
12/12/2018	Wash DPPA Swapp	Prepare for class certification hearing	$875.00 hr	1.50	1.50	$1,312.50
12/13/2018	Wash DPPA Swapp	Class certification hearing	$875.00 hr	1.30	1.30	$1,137.50
12/21/2018	Wash DPPA Swapp	Review order on insurer ____ to detail?/indemnify	$875.00 hr	0.20	0.20	$175.00
12/21/2018	Wash DPPA Swapp	Correspondence w/ defendants counsel re: decision re: claime? toe indemnify/defense?	$875.00 hr	0.20	0.20	$175.00
12/21/2018	Wash DPPA Swapp	Review decision on ST in Wilcox vs. Batiste	$875.00 hr	0.40	0.40	$350.00
01/24/2019	Wash DPPA Swapp	Review order on MTD	$875.00 hr	0.40	0.40	$350.00
01/25/2019	Wash DPPA Swapp	Review order on motion to certify class	$875.00 hr	0.50	0.50	$437.50
01/28/2019	Wash DPPA Swapp	Call w/ T. Jarrard re: discovery and class notes	$875.00 hr	0.50	0.50	$437.50
01/28/2019	Wash DPPA Swapp	Call w/ J. Leviton re: settlement and status of case	$875.00 hr	0.70	0.70	$612.50
01/29/2019	Wash DPPA Swapp	Review spreadsheets to determine class data for class notice	$875.00 hr	0.80	0.80	$700.00
01/29/2019	Wash DPPA Swapp	Review class data from notice	$875.00 hr	0.60	0.60	$525.00
01/30/2019	Wash DPPA Swapp	Correspondence w/ T. Jarrard re: class certification	$875.00 hr	0.20	0.20	$175.00
01/31/2019	Wash DPPA Swapp	Correspondence w/ defendants counsel and w/ B. Duffy re: status report	$875.00 hr	0.20	0.20	$175.00
01/31/2019	Wash DPPA Swapp	Call w/ J. Leviton re: notice	$875.00 hr	0.20	0.20	$175.00
02/01/2019	Wash DPPA Swapp	Correspondence w/ J. Leviton re: discovery	$875.00 hr	0.30	0.30	$262.50
02/04/2019	Wash DPPA Swapp	Review draft joint status report and conv w/ C. Downes re: same	$875.00 hr	0.30	0.30	$262.50
02/04/2019	Wash DPPA Swapp	Edit joint status report	$875.00 hr	0.90	0.90	$787.50
02/04/2019	Wash DPPA Swapp	Correspondence w/ B. Duffy re: settlement status conference	$875.00 hr	0.20	0.20	$175.00
02/04/2019	Wash DPPA Swapp	Edit joint status report	$875.00 hr	0.30	0.30	$262.50
02/08/2019	Wash DPPA Swapp	Draft settlement demand to defendants	$875.00 hr	0.50	0.50	$437.50
02/08/2019	Wash DPPA Swapp	Review defendants motion for reconsideration	$875.00 hr	0.30	0.30	$262.50
02/08/2019	Wash DPPA Swapp	Correspondence w/ B. Duffy re: status report.	$875.00 hr	0.20	0.20	$175.00
02/08/2019	Wash DPPA Swapp	Correspondence w/ J. Leviton re: settlement	$875.00 hr	0.10	0.10	$87.50
02/08/2019	Wash DPPA Swapp	Review defendants edits to status report and revise same	$875.00 hr	0.60	0.60	$525.00
02/08/2019	Wash DPPA Swapp	Review defendants edits to status report and revise same	$875.00 hr	0.20	0.20	$175.00
02/15/2019	Wash DPPA Swapp	Review RFP for class notice	$875.00 hr	0.40	0.40	$350.00
02/15/2019	Wash DPPA Swapp	Correspondence w/ M. Siegel re: RFPs for class notice	$875.00 hr	0.50	0.50	$437.50

02/17/2019	Wash DPPA Swapp	Correspondence w/ defendants re: settlement	$875.00 hr	0.50	0.50	$437.50
02/17/2019	Wash DPPA Swapp	Review deposition for malpractice case v. Swapp	$875.00 hr	0.90	0.90	$787.50
02/20/2019	Wash DPPA Swapp	Call w/ defendants counsel re: discovery and settlement	$875.00 hr	0.70	0.70	$612.50
03/06/2019	Wash DPPA Swapp	Call w/ Sr. Judge Suko re: settlement conference	$875.00 hr	0.50	0.50	$437.50
03/06/2019	Wash DPPA Swapp	Call w/ T. Jarrard re: settlement	$875.00 hr	0.10	0.10	$87.50
03/18/2019	Wash DPPA Swapp	Review order on settlement conference	$875.00 hr	0.20	0.20	$175.00
03/20/2019	Wash DPPA Swapp	Correspondence w/ T. Jarrard re: settlement conference	$875.00 hr	0.20	0.20	$175.00
03/20/2019	Wash DPPA Swapp	Correspondence w/ T. Jarrard re: settlement conference	$875.00 hr	0.10	0.10	$87.50
03/25/2019	Wash DPPA Swapp	Edit letter to Judge Suko re: settlement conference	$875.00 hr	0.50	0.50	$437.50
04/30/2019	Wash DPPA Swapp	Review email documents to prepare for call	$875.00 hr	0.50	0.50	$437.50
04/30/2019	Wash DPPA Swapp	Call w/ mediator/settlement judge	$875.00 hr	0.40	0.40	$350.00
04/30/2019	Wash DPPA Swapp	Call w/ T. Jarrard re: mediation	$875.00 hr	0.40	0.40	$350.00
05/08/2019	Wash DPPA Swapp	Call w/ D. File re: settlement action proposal	$875.00 hr	0.30	0.30	$262.50
05/15/2019	Wash DPPA Swapp	Review RG2 settlement admin bid	$875.00 hr	0.30	0.30	$262.50
05/20/2019	Wash DPPA Swapp	Correspondence w/ T. Jarrard re: mediation	$875.00 hr	0.20	0.20	$175.00
05/21/2019	Wash DPPA Swapp	Review updated financial disclosures and E. West report	$875.00 hr	1.50	1.50	$1,312.50
05/22/2019	Wash DPPA Swapp	Travel to Yakima for settlement offered (not billed elsewhere)	$875.00 hr	0.70	0.70	$612.50
05/22/2019	Wash DPPA Swapp	Travel to Yakima for settlement offered (not billed elsewhere)	$875.00 hr	4.00	4.00	$3,500.00
05/23/2019	Wash DPPA Swapp	Settlement conference	$875.00 hr	9.00	9.00	$7,875.00
05/23/2019	Wash DPPA Swapp	Travel from settlement conference	$875.00 hr	2.50	2.50	$2,187.50
05/30/2019	Wash DPPA Swapp	Review transcript of settlement conference/term sheet	$875.00 hr	0.70	0.70	$612.50
07/11/2019	Wash DPPA Swapp	Correspondence w/ J. Kim re: settlement	$875.00 hr	0.20	0.20	$175.00
07/11/2019	Wash DPPA Swapp	Review draft settlement agreement	$875.00 hr	0.20	0.20	$175.00
07/18/2019	Wash DPPA Swapp	Review escrow agreement	$875.00 hr	1.50	1.50	$1,312.50
07/18/2019	Wash DPPA Swapp	Edit settlement agreement	$875.00 hr	2.00	2.00	$1,750.00
07/19/2019	Wash DPPA Swapp	Edit settlement agreement	$875.00 hr	1.80	1.80	$1,575.00
07/19/2019	Wash DPPA Swapp	Edit settlement agreement	$875.00 hr	1.00	1.00	$875.00
07/19/2019	Wash DPPA Swapp	Edit settlement agreement	$875.00 hr	1.30	1.30	$1,137.50
07/19/2019	Wash DPPA Swapp	Edit settlement agreement	$875.00 hr	0.50	0.50	$437.50
08/22/2019	Wash DPPA Swapp	Edit settlement ageement	$875.00 hr	0.50	0.50	$437.50
08/23/2019	Wash DPPA Swapp	Edit settlement agreement	$875.00 hr	0.80	0.80	$700.00
08/23/2019	Wash DPPA Swapp	Edit settlement agreement	$875.00 hr	0.50	0.50	$437.50
08/23/2019	Wash DPPA Swapp	Edit settlement agreement	$875.00 hr	0.50	0.50	$437.50
08/23/2019	Wash DPPA Swapp	Edit settlement agreement	$875.00 hr	1.60	1.60	$1,400.00
08/26/2019	Wash DPPA Swapp	Edit settlement agreement	$875.00 hr	5.00	5.00	$4,375.00
08/26/2019	Wash DPPA Swapp	Correspondence w/ J. king re: settlement	$875.00 hr	0.40	0.40	$350.00
08/26/2019	Wash DPPA Swapp	Review T. Jarrard comments on settlement and final agreement to defendants	$875.00 hr	0.50	0.50	$437.50
08/27/2019	Wash DPPA Swapp	Edit settlement conference	$875.00 hr	1.00	1.00	$875.00
08/28/2019	Wash DPPA Swapp	Edit settlement conference	$875.00 hr	1.00	1.00	$875.00

08/28/2019	Wash DPPA Swapp	Review payments for settlement order	$875.00 hr	0.30	0.30	$262.50
08/29/2019	Wash DPPA Swapp	Edit class notice	$875.00 hr	1.00	1.00	$875.00
08/30/2019	Wash DPPA Swapp	Edit class notice	$875.00 hr	0.70	0.70	$612.50
09/06/2019	Wash DPPA Swapp	Draft letter to J. King re: settlement	$875.00 hr	0.50	0.50	$437.50
09/23/2019	Wash DPPA Swapp	Edit motion for preliminary appeal	$875.00 hr	2.00	2.00	$1,750.00
09/26/2019	Wash DPPA Swapp	Review class data	$875.00 hr	1.00	1.00	$875.00
09/28/2019	Wash DPPA Swapp	Correspondence w/ J. King re: settlement agreement	$875.00 hr	0.10	0.10	$87.50
10/01/2019	Wash DPPA Swapp	Review defendants letter re: settlement agreement	$875.00 hr	0.20	0.20	$175.00
10/02/2019	Wash DPPA Swapp	Review settlement administration reissued bid	$875.00 hr	0.30	0.30	$262.50
10/02/2019	Wash DPPA Swapp	Review letter from J. King and correspondence w/ J. King re: settlement edits	$875.00 hr	0.20	0.20	$175.00
10/03/2019	Wash DPPA Swapp	Review proposals for settlement date	$875.00 hr	0.40	0.40	$350.00
10/03/2019	Wash DPPA Swapp	Edit settlement conference	$875.00 hr	0.40	0.40	$350.00
10/03/2019	Wash DPPA Swapp	Edit settlement agreement	$875.00 hr	2.90	2.90	$2,537.50
10/04/2019	Wash DPPA Swapp	Edit settlement agreement	$875.00 hr	0.50	0.50	$437.50
10/04/2019	Wash DPPA Swapp	Review charts re: administrative services	$875.00 hr	0.30	0.30	$262.50
10/04/2019	Wash DPPA Swapp	Review charts re: administrative services	$875.00 hr	0.50	0.50	$437.50
10/09/2019	Wash DPPA Swapp	Edit motion for preliminary appeal	$875.00 hr	1.80	1.80	$1,575.00
10/11/2019	Wash DPPA Swapp	Review Plan of Allocation	$875.00 hr	0.80	0.80	$700.00
10/15/2019	Wash DPPA Swapp	Correspondence w/ C. Downes re: motion for preliminary appeal	$875.00 hr	0.50	0.50	$437.50
10/15/2019	Wash DPPA Swapp	Edit final settlement conference	$875.00 hr	0.50	0.50	$437.50
10/15/2019	Wash DPPA Swapp	Correspondence w. defendants re: settlement	$875.00 hr	0.20	0.20	$175.00
10/16/2019	Wash DPPA Swapp	Edit preliminary approval order	$875.00 hr	1.10	1.10	$962.50
10/16/2019	Wash DPPA Swapp	Edit plan of allocation	$875.00 hr	1.60	1.60	$1,400.00
10/18/2019	Wash DPPA Swapp	Correspondence w/ C. Downes re: bids	$875.00 hr	0.40	0.40	$350.00
10/24/2019	Wash DPPA Swapp	Review settlement administration bids	$875.00 hr	0.50	0.50	$437.50
10/25/2019	Wash DPPA Swapp	Edit preliminary approval motion	$875.00 hr	0.40	0.40	$350.00
10/25/2019	Wash DPPA Swapp	Approve finalization of preliminary approval motion	$875.00 hr	0.20	0.20	$175.00
10/31/2019	Wash DPPA Swapp	Review 9th Circuit division in Sirius XM	$875.00 hr	0.30	0.30	$262.50
11/24/2019	Wash DPPA Swapp	Prepare for hearing on preliminary approval	$875.00 hr	1.90	1.90	$1,662.50
11/25/2019	Wash DPPA Swapp	Prepare for preliminary approval hearing	$875.00 hr	4.00	4.00	$3,500.00
11/25/2019	Wash DPPA Swapp	Preliminary approval hearing	$875.00 hr	1.50	1.50	$1,312.50
11/27/2019	Wash DPPA Swapp	Review order on preliminary approval	$875.00 hr	0.30	0.30	$262.50
12/24/2019	Wash DPPA Swapp	Correspondence w/ Settlement admin re: website	$875.00 hr	0.20	0.20	$175.00
12/26/2019	Wash DPPA Swapp	Edit class notice	$875.00 hr	0.50	0.50	$437.50
12/26/2019	Wash DPPA Swapp	Research re: service awards	$875.00 hr	1.00	1.00	$875.00
12/26/2019	Wash DPPA Swapp	Review/edit final class notice	$875.00 hr	0.60	0.60	$525.00
12/27/2019	Wash DPPA Swapp	Correspondence w/ T. Jarrard	$875.00 hr	0.40	0.40	$350.00
12/27/2019	Wash DPPA Swapp	Review Settlement Administrator statement of Washington	$875.00 hr	0.30	0.30	$262.50
12/30/2019	Wash DPPA Swapp	Correspondence w/ J. Sweetser re: service award	$875.00 hr	0.10	0.10	$87.50

01/02/2020	Wash DPPA Swapp	Review defendants letter re: class data and correspondence w/ defendants re: class data exclusions	$875.00 hr	0.50	0.50	$437.50
01/02/2020	Wash DPPA Swapp	Correspondence w/ Settlement Administrator re: exclusions from class data	$875.00 hr	0.50	0.50	$437.50
01/02/2020	Wash DPPA Swapp	Correspondence w/ M. Siegel re: wire transfer re: class notice ce?	$875.00 hr	0.20	0.20	$175.00
01/02/2020	Wash DPPA Swapp	Review defendants response re: exclusions from class data	$875.00 hr	0.10	0.10	$87.50
01/02/2020	Wash DPPA Swapp	Review Sweetzer fees	$875.00 hr	0.80	0.80	$700.00
01/05/2020	Wash DPPA Swapp	Correspondence w/ J. Sweetser re: fee submission	$875.00 hr	0.50	0.50	$437.50
01/07/2020	Wash DPPA Swapp	Review website	$875.00 hr	0.40	0.40	$350.00
01/08/2020	Wash DPPA Swapp	Correspondence w/ J. Sweetser re: fees	$875.00 hr	0.70	0.70	$612.50
01/09/2020	Wash DPPA Swapp	Correspondence w/ A.J. Jeter re: Statement of work	$875.00 hr	0.70	0.70	$612.50
01/16/2020	Wash DPPA Swapp	Review Settlement Admin class list for notice	$875.00 hr	0.20	0.20	$175.00
01/21/2020	Wash DPPA Swapp	Correspondence w/ D. Vifol re: potential expert opinion on settlement	$875.00 hr	0.20	0.20	$175.00
01/24/2020	Wash DPPA Swapp	Correspondence w/ R. Vigil re: value or non-monetary relief	$875.00 hr	0.10	0.10	$87.50
01/27/2020	Wash DPPA Swapp	Call w/ C. Clapp re: Angeion statement of work	$875.00 hr	0.30	0.30	$262.50
02/06/2020	Wash DPPA Swapp	Review settlement webpage	$875.00 hr	0.30	0.30	$262.50
			Total Labor For Joe Barton	**451.30**	**451.30**	**$394,887.50**

Matt Smith

08/23/2018	Wash DPPA Swapp	Call with J. Barton and T. Kirchofer re: Swapp deposition preparation	$650.00 hr	0.50	0.50	$325.00
08/23/2018	Wash DPPA Swapp	Read pleadings and discovery materials to-date	$650.00 hr	1.40	1.40	$910.00
08/23/2018	Wash DPPA Swapp	Call with Ming Siegel re: review of Swapp production	$650.00 hr	0.40	0.40	$260.00
08/23/2018	Wash DPPA Swapp	Call with T. Kirchofer re: document review of swapp production	$650.00 hr	0.30	0.30	$195.00
08/23/2018	Wash DPPA Swapp	Review Swapp production	$650.00 hr	2.40	2.40	$1,560.00
08/24/2018	Wash DPPA Swapp	Review T. Kirchofer memo re: deposition errata sheet	$650.00 hr	0.10	0.10	$65.00
08/24/2018	Wash DPPA Swapp	Swapp document review	$650.00 hr	0.80	0.80	$520.00
08/24/2018	Wash DPPA Swapp	Review Joel Hallberg Docs	$650.00 hr	2.00	2.00	$1,300.00
08/24/2018	Wash DPPA Swapp	Review Derek Sanders docs	$650.00 hr	2.00	2.00	$1,300.00
08/27/2018	Wash DPPA Swapp	Review background info on Swapp witnesses	$650.00 hr	0.30	0.30	$195.00
08/27/2018	Wash DPPA Swapp	Review Joel Hallberg docs	$650.00 hr	0.30	0.30	$195.00
08/30/2018	Wash DPPA Swapp	Review quick-peek docs from defendants	$650.00 hr	0.70	0.70	$455.00
08/30/2018	Wash DPPA Swapp	Review defendants' quick peek production	$650.00 hr	0.70	0.70	$455.00
08/30/2018	Wash DPPA Swapp	Review Swapp quick peek docs	$650.00 hr	1.80	1.80	$1,170.00
08/31/2018	Wash DPPA Swapp	Review Swapp quick peek docs and make notes	$650.00 hr	1.10	1.10	$715.00
08/31/2018	Wash DPPA Swapp	Finish Swapp quick peak review and make notes	$650.00 hr	1.00	1.00	$650.00
09/06/2018	Wash DPPA Swapp	Review quick peek docs and send meet and confer email to Barbara	$650.00 hr	0.50	0.50	$325.00
09/06/2018	Wash DPPA Swapp	Review Joel Hallberg docs	$650.00 hr	0.60	0.60	$390.00
09/07/2018	Wash DPPA Swapp	Review investigator documents	$650.00 hr	0.40	0.40	$260.00
09/11/2018	Wash DPPA Swapp	Review quick peek docs in preparation for meet and confer	$650.00 hr	1.00	1.00	$650.00

09/11/2018	Wash DPPA Swapp	Search for contact information of former Swapp employees	$650.00 hr	0.50	0.50	$325.00
09/11/2018	Wash DPPA Swapp	Call with B. Duffy re: quick peek redactions	$650.00 hr	1.30	1.30	$845.00
10/02/2018	Wash DPPA Swapp	Review Swapp MTD opposition	$650.00 hr	0.60	0.60	$390.00
10/09/2018	Wash DPPA Swapp	Call with J. Barton, V. Cheng, M. Siegel, re: case status	$650.00 hr	0.60	0.60	$390.00
10/09/2018	Wash DPPA Swapp	Review Swapp documents	$650.00 hr	0.60	0.60	$390.00
10/19/2018	Wash DPPA Swapp	Email to B. Duffy re: documents to be covered by stipulation	$650.00 hr	0.40	0.40	$260.00
11/06/2018	Wash DPPA Swapp	Call with Colin Downes re: Swapp doc review	$650.00 hr	0.20	0.20	$130.00
			Total Labor For Matt Smith	**22.50**	**22.50**	**$14,625.00**

Ming Siegel

08/23/2017	Wash DPPA Swapp	Drafting Motions for PHV for Joe Barton and Tom Kirchofer	$265.00 hr	0.50	0.50	$132.50
08/24/2017	Wash DPPA Swapp	Preparing PHV Motions and ECF login forms for Joe Barton and Tom Kirchofer	$265.00 hr	1.50	1.50	$397.50
08/25/2017	Wash DPPA Swapp	Drafting Jason Leviton Motion for PHV	$265.00 hr	0.50	0.50	$132.50
08/28/2017	Wash DPPA Swapp	Call with Thomas Jarrard and E.D. Wash. Clerk RE PHV motions.	$265.00 hr	0.30	0.30	$79.50
08/29/2017	Wash DPPA Swapp	Finalizing Jason's PHV and sending to Tom Jarrard	$265.00 hr	0.30	0.30	$79.50
09/19/2017	Wash DPPA Swapp	Manage case files regarding Complaint	$265.00 hr	0.50	0.50	$132.50
11/07/2017	Wash DPPA Swapp	Drafting Opp to MTD and Request for Judicial Notice	$265.00 hr	0.90	0.90	$238.50
11/07/2017	Wash DPPA Swapp	Assisting with drafting Opp to Motion to Dismiss	$265.00 hr	0.70	0.70	$185.50
11/07/2017	Wash DPPA Swapp	Assisting with drafting Opp to Motion to Dismiss	$265.00 hr	1.20	1.20	$318.00
11/07/2017	Wash DPPA Swapp	Assisting with preparing for motion to dismiss hearing	$265.00 hr	0.40	0.40	$106.00
11/10/2017	Wash DPPA Swapp	Cite checking and editing Opp to MTD	$265.00 hr	2.80	2.80	$742.00
11/10/2017	Wash DPPA Swapp	Cite checking and editing Opp to MTD	$265.00 hr	1.00	1.00	$265.00
11/13/2017	Wash DPPA Swapp	Cite checking Opp to Judicial Notice	$265.00 hr	1.00	1.00	$265.00
11/13/2017	Wash DPPA Swapp	Cite checking Opp to Judicial Notice	$265.00 hr	1.00	1.00	$265.00
11/13/2017	Wash DPPA Swapp	Drafting Siegel declaration RE Judicial Notice	$265.00 hr	0.40	0.40	$106.00
11/13/2017	Wash DPPA Swapp	Editing Opp to Motion to Dismiss	$265.00 hr	1.30	1.30	$344.50
11/13/2017	Wash DPPA Swapp	Editing Opp to Motion to Dismiss	$265.00 hr	0.60	0.60	$159.00
11/13/2017	Wash DPPA Swapp	Editing Opp to Motion to Dismiss	$265.00 hr	0.60	0.60	$159.00
11/13/2017	Wash DPPA Swapp	Finalizing and filing Opp to MTD and Opp to Judicial Notice	$265.00 hr	0.80	0.80	$212.00
11/29/2017	Wash DPPA Swapp	Assist with Prep for Hearing on MTD	$265.00 hr	0.70	0.70	$185.50
11/29/2017	Wash DPPA Swapp	Assist with Prep for hearing on MTD	$265.00 hr	0.50	0.50	$132.50
12/11/2017	Wash DPPA Swapp	Assist with Prep for Hearing on MTD	$265.00 hr	2.00	2.00	$530.00
12/12/2017	Wash DPPA Swapp	Assist with Prep for Hearing on MTD	$265.00 hr	4.00	4.00	$1,060.00
12/13/2017	Wash DPPA Swapp	Assist with Prep for Hearing on MTD	$265.00 hr	1.80	1.80	$477.00
12/13/2017	Wash DPPA Swapp	Assist with Prep for Hearing on MTD	$265.00 hr	0.80	0.80	$212.00
12/14/2017	Wash DPPA Swapp	Assist with for Hearing on MTD	$265.00 hr	0.30	0.30	$79.50
01/08/2018	Wash DPPA Swapp	Reviewing scheduling conference order	$265.00 hr	0.30	0.30	$79.50
01/18/2018	Wash DPPA Swapp	Call with Joe Barton and Tom Kirchofer RE discovery requests	$265.00 hr	0.30	0.30	$79.50

01/18/2018	Wash DPPA Swapp	Editing Joint Status Report	$265.00 hr	0.30	0.30	$79.50
01/18/2018	Wash DPPA Swapp	Editing Ps First RFP	$265.00 hr	0.30	0.30	$79.50
01/18/2018	Wash DPPA Swapp	Reviewing Defs' admissions in Answer to Complaint	$265.00 hr	1.00	1.00	$265.00
01/18/2018	Wash DPPA Swapp	Drafting Ps 1st RFA	$265.00 hr	2.00	2.00	$530.00
01/19/2018	Wash DPPA Swapp	Editing Ps 1st RFP	$265.00 hr	0.50	0.50	$132.50
01/19/2018	Wash DPPA Swapp	Drafting Ps 1st RFA	$265.00 hr	0.50	0.50	$132.50
01/22/2018	Wash DPPA Swapp	Editing Stip RE Rule 12f	$265.00 hr	0.30	0.30	$79.50
01/31/2018	Wash DPPA Swapp	Editing Pls Initial Disclosures	$265.00 hr	0.50	0.50	$132.50
01/31/2018	Wash DPPA Swapp	Editing format of Pls RFA	$265.00 hr	0.20	0.20	$53.00
01/31/2018	Wash DPPA Swapp	Finalizing and filing Joint Status Certificate	$265.00 hr	0.30	0.30	$79.50
02/01/2018	Wash DPPA Swapp	Editing Ps Initial Disclosures	$265.00 hr	0.50	0.50	$132.50
02/02/2018	Wash DPPA Swapp	Editing Pls First RFP and RFA	$265.00 hr	0.30	0.30	$79.50
02/02/2018	Wash DPPA Swapp	Managing case files regarding Answer to the Complaint	$265.00 hr	0.30	0.30	$79.50
02/06/2018	Wash DPPA Swapp	Editing Ps First Set of Interrogatories	$265.00 hr	0.80	0.80	$212.00
02/07/2018	Wash DPPA Swapp	Editing 1st set of Rogs	$265.00 hr	0.30	0.30	$79.50
02/12/2018	Wash DPPA Swapp	Cite checking motion to strike	$265.00 hr	0.30	0.30	$79.50
02/12/2018	Wash DPPA Swapp	Cite checking and editing motion to strike	$265.00 hr	2.00	2.00	$530.00
02/12/2018	Wash DPPA Swapp	Editing 1st Set of Interrogatories	$265.00 hr	0.20	0.20	$53.00
02/12/2018	Wash DPPA Swapp	Finalizing and serving Pls First Set of Interrogatories	$265.00 hr	0.40	0.40	$106.00
02/13/2018	Wash DPPA Swapp	Editing the motion to strike	$265.00 hr	1.50	1.50	$397.50
02/15/2018	Wash DPPA Swapp	Editing Stipulation/Protective Order	$265.00 hr	0.50	0.50	$132.50
02/15/2018	Wash DPPA Swapp	Review and analyze jury trial scheduling order	$265.00 hr	0.80	0.80	$212.00
02/23/2018	Wash DPPA Swapp	Manage case files regarding jury trial scheduling order	$265.00 hr	0.30	0.30	$79.50
02/27/2018	Wash DPPA Swapp	Conference Call with Tom Kirchofer and Kathleen Britt	$265.00 hr	0.70	0.70	$185.50
02/27/2018	Wash DPPA Swapp	Drafting notes from conference call with Kathleen Britt	$265.00 hr	0.50	0.50	$132.50
03/06/2018	Wash DPPA Swapp	Cite checking and editing Reply ISO Motion to Strike	$265.00 hr	1.50	1.50	$397.50
03/06/2018	Wash DPPA Swapp	Cite checking and editing Reply ISO Motion to Strike	$265.00 hr	1.00	1.00	$265.00
03/06/2018	Wash DPPA Swapp	Editing Reply ISO Motion to Strike	$265.00 hr	0.80	0.80	$212.00
03/06/2018	Wash DPPA Swapp	Drafting Declaration of Thomas Kirchofer RE Reply ISO Motion to Strike and preparing Exhibit A	$265.00 hr	0.50	0.50	$132.50
03/06/2018	Wash DPPA Swapp	Editing Reply ISO Motion to Strike	$265.00 hr	0.30	0.30	$79.50
03/06/2018	Wash DPPA Swapp	Correspondence with Tom Kirchofer RE final Reply ISO Motion to Strike brief, declaration and exhibit	$265.00 hr	0.30	0.30	$79.50
03/06/2018	Wash DPPA Swapp	Finalizing Reply ISO Motion to Strike brief, Kirchofer declaration and exhibit and circulating to Tom Jarrard	$265.00 hr	0.30	0.30	$79.50
03/07/2018	Wash DPPA Swapp	Finalizing and serving Plaintiffs 2nd set of RFA and preparing hardcopy	$265.00 hr	0.50	0.50	$132.50
03/07/2018	Wash DPPA Swapp	Managing formal discovery files regarding Parties' Initial Disclosures	$265.00 hr	0.20	0.20	$53.00
03/08/2018	Wash DPPA Swapp	Finalizing Letter RE Initial Disclosures and serving on Defs	$265.00 hr	0.30	0.30	$79.50
03/09/2018	Wash DPPA Swapp	Preparing Plaintiff's responses to Defs 1st Rogs and RFP	$265.00 hr	0.50	0.50	$132.50

03/15/2018	Wash DPPA Swapp	Reviewing Jade Wilcox documents	$265.00 hr	1.30	1.30	$344.50
03/16/2018	Wash DPPA Swapp	Manage data from client re: Jade Wilcox's brochure from Swapp Law	$265.00 hr	0.20	0.20	$53.00
03/16/2018	Wash DPPA Swapp	Reviewing protective order	$265.00 hr	0.30	0.30	$79.50
03/19/2018	Wash DPPA Swapp	Manage data re: Plaintiff's Initial Disclosures production	$265.00 hr	0.50	0.50	$132.50
03/19/2018	Wash DPPA Swapp	Manage case files regarding class cert briefing order	$265.00 hr	0.30	0.30	$79.50
03/19/2018	Wash DPPA Swapp	Manage data re: Plaintiff's Initial Disclosures production	$265.00 hr	1.00	1.00	$265.00
03/19/2018	Wash DPPA Swapp	Manage data re: Jade Wilcox documents	$265.00 hr	0.30	0.30	$79.50
03/19/2018	Wash DPPA Swapp	Manage data re: Plaintiff's initial document production	$265.00 hr	0.30	0.30	$79.50
03/19/2018	Wash DPPA Swapp	Serving Plaintiff's production pursuant to Initial Disclosures	$265.00 hr	0.30	0.30	$79.50
03/20/2018	Wash DPPA Swapp	Conference call with Jade Wilcox	$265.00 hr	0.80	0.80	$212.00
03/22/2018	Wash DPPA Swapp	Manage case files regarding stipulated protective order	$265.00 hr	0.30	0.30	$79.50
03/22/2018	Wash DPPA Swapp	Drafting notes from conference call with client on 03-20-2018	$265.00 hr	0.50	0.50	$132.50
03/23/2018	Wash DPPA Swapp	Call with Joe Barton and Tom Kirchofer RE productions	$265.00 hr	0.40	0.40	$106.00
04/13/2018	Wash DPPA Swapp	Correspondence with Tom Kirchofer RE Swapp Dropbox docs	$265.00 hr	0.30	0.30	$79.50
04/20/2018	Wash DPPA Swapp	Reviewing Wilcox v. Batiste documents	$265.00 hr	2.30	2.30	$609.50
04/24/2018	Wash DPPA Swapp	Reviewing Wilcox v. Batiste Defendants' productions	$265.00 hr	1.80	1.80	$477.00
04/25/2018	Wash DPPA Swapp	Reviewing Wilcox v. Batiste Defendants' productions	$265.00 hr	1.00	1.00	$265.00
04/27/2018	Wash DPPA Swapp	Call with Tom Kirchofer re: next plaintiff's production	$265.00 hr	0.20	0.20	$53.00
04/30/2018	Wash DPPA Swapp	Reviewing Wilcox v. Batiste Defendants' productions	$265.00 hr	0.50	0.50	$132.50
04/30/2018	Wash DPPA Swapp	Call with Tom Kirchofer RE Wilcox v. Batiste document productions	$265.00 hr	0.30	0.30	$79.50
04/30/2018	Wash DPPA Swapp	Manage data re: Plaintiff's production	$265.00 hr	0.40	0.40	$106.00
04/30/2018	Wash DPPA Swapp	Manage data re: Wilcox v. Batiste Plaintiff's productions	$265.00 hr	0.50	0.50	$132.50
04/30/2018	Wash DPPA Swapp	Reviewing Wilcox v. Batiste Defendant's document productions	$265.00 hr	1.00	1.00	$265.00
05/01/2018	Wash DPPA Swapp	Reviewing Wilcox v. Batiste Defendants' Production	$265.00 hr	2.50	2.50	$662.50
05/01/2018	Wash DPPA Swapp	Reviewing Batiste Plaintiffs docs	$265.00 hr	0.80	0.80	$212.00
05/01/2018	Wash DPPA Swapp	Drafting and sending letter from Tom Kirchofer to Barbara Duffy re: discovery	$265.00 hr	0.30	0.30	$79.50
05/01/2018	Wash DPPA Swapp	Reviewing Wilcox v. Batiste Plaintiff's productions	$265.00 hr	0.90	0.90	$238.50
05/01/2018	Wash DPPA Swapp	Manage data re: Pls production of Wilcox v. Batiste Defendants' productions	$265.00 hr	2.00	2.00	$530.00
05/02/2018	Wash DPPA Swapp	Manage data re: Pls production of Wilcox v. Batiste Defendants' productions	$265.00 hr	0.30	0.30	$79.50
05/02/2018	Wash DPPA Swapp	Preparing Batiste Plaintiffs Discovery documents for production	$265.00 hr	0.20	0.20	$53.00
05/02/2018	Wash DPPA Swapp	Manage formal discovery files regarding Defendants' Responses to First Set of Interrogatories	$265.00 hr	0.50	0.50	$132.50
05/02/2018	Wash DPPA Swapp	Discuss plaintiff's production of documents with Tom Kirchofer	$265.00 hr	0.20	0.20	$53.00
05/02/2018	Wash DPPA Swapp	Manage data re: Plaintiff's production of documents	$265.00 hr	0.20	0.20	$53.00
05/02/2018	Wash DPPA Swapp	Call with Tom Kirchofer and Joe Barton RE discovery	$265.00 hr	0.80	0.80	$212.00
05/02/2018	Wash DPPA Swapp	Reviewing Defendants' production of documents	$265.00 hr	0.50	0.50	$132.50
05/03/2018	Wash DPPA Swapp	Manage data re: confidential documents	$265.00 hr	0.50	0.50	$132.50
05/03/2018	Wash DPPA Swapp	Finalizing letter re: settlement demand	$265.00 hr	0.20	0.20	$53.00
05/03/2018	Wash DPPA Swapp	Manage data re: client documents from Sweetser Law	$265.00 hr	1.00	1.00	$265.00

05/03/2018	Wash DPPA Swapp	Manage data re: client documents from Sweetser Law	$265.00 hr	0.30	0.30	$79.50
05/03/2018	Wash DPPA Swapp	Manage data re: client documents from Sweetser Law	$265.00 hr	1.30	1.30	$344.50
05/04/2018	Wash DPPA Swapp	Call with Kizzie Johnson RE Wilcox v. Batiste document productions	$265.00 hr	0.20	0.20	$53.00
05/07/2018	Wash DPPA Swapp	Manage data re: additional Plaintiff's production	$265.00 hr	0.20	0.20	$53.00
05/07/2018	Wash DPPA Swapp	Manage data re: additional Plaintiff's production	$265.00 hr	0.20	0.20	$53.00
05/07/2018	Wash DPPA Swapp	Manage data re: additional Plaintiff's production	$265.00 hr	0.50	0.50	$132.50
05/10/2018	Wash DPPA Swapp	Manage case files re: Amended Complaint and Answer to Amended Complaint	$265.00 hr	0.40	0.40	$106.00
05/10/2018	Wash DPPA Swapp	Finalizing and serving the Notice of Subpoena and subpoena to the Washington State Patrol	$265.00 hr	0.40	0.40	$106.00
05/10/2018	Wash DPPA Swapp	Manage data re: Defendants' production	$265.00 hr	0.30	0.30	$79.50
05/14/2018	Wash DPPA Swapp	Manage data re: Wilcox Insurance documents	$265.00 hr	0.30	0.30	$79.50
05/14/2018	Wash DPPA Swapp	Drafting Proposed Order RE Class Cert Brief Schedule	$265.00 hr	0.30	0.30	$79.50
05/14/2018	Wash DPPA Swapp	Manage data re: Wilcox Insurance Declaration	$265.00 hr	0.30	0.30	$79.50
05/14/2018	Wash DPPA Swapp	Manage data re: Defendants' productions	$265.00 hr	1.80	1.80	$477.00
05/15/2018	Wash DPPA Swapp	Manage data re: Defendants' productions	$265.00 hr	0.30	0.30	$79.50
05/15/2018	Wash DPPA Swapp	Manage data re: Defendants' productions	$265.00 hr	0.80	0.80	$212.00
05/15/2018	Wash DPPA Swapp	Correspondence with Tom Kirchofer RE documents from Sweetser Law Firm	$265.00 hr	0.20	0.20	$53.00
05/15/2018	Wash DPPA Swapp	Call with Tom Kirchofer RE WSP powerpoints	$265.00 hr	0.10	0.10	$26.50
05/15/2018	Wash DPPA Swapp	Manage data re: Defendants' productions	$265.00 hr	0.20	0.20	$53.00
05/16/2018	Wash DPPA Swapp	Manage case files re: Order granting extension of time RE class cert briefing	$265.00 hr	0.30	0.30	$79.50
05/22/2018	Wash DPPA Swapp	Manage case files re: non-party subpoenas	$265.00 hr	0.20	0.20	$53.00
05/23/2018	Wash DPPA Swapp	Editing Motion to Compel and Barton Declaration	$265.00 hr	0.50	0.50	$132.50
05/24/2018	Wash DPPA Swapp	Finalizing, emailing and preparing hardcopy of Letter from Thomas Kirchofer dated 5-24-2018	$265.00 hr	0.40	0.40	$106.00
05/24/2018	Wash DPPA Swapp	Call with Tom Kirchofer RE reviewing Swapp production	$265.00 hr	0.20	0.20	$53.00
05/25/2018	Wash DPPA Swapp	Reviewing Defendants' production	$265.00 hr	1.40	1.40	$371.00
05/25/2018	Wash DPPA Swapp	Reviewing Defendants' production	$265.00 hr	0.30	0.30	$79.50
05/25/2018	Wash DPPA Swapp	Manage data and reviewing WSP subpoena docs	$265.00 hr	0.30	0.30	$79.50
05/30/2018	Wash DPPA Swapp	Reviewing WSP production of docments	$265.00 hr	0.20	0.20	$53.00
05/30/2018	Wash DPPA Swapp	Manage data re: Wilcox license	$265.00 hr	0.20	0.20	$53.00
06/04/2018	Wash DPPA Swapp	Preparing subpoenas and notices to Wash Police Dept and Wash Dept of Licensing	$265.00 hr	1.00	1.00	$265.00
06/04/2018	Wash DPPA Swapp	Preparing subpoenas and notices to Wash Police Dept and Wash Dept of Licensing	$265.00 hr	0.60	0.60	$159.00
06/04/2018	Wash DPPA Swapp	Preparing subpoenas and notices to Wash Police Dept and Wash Dept of Licensing	$265.00 hr	0.30	0.30	$79.50
06/04/2018	Wash DPPA Swapp	Call with WA Dept of Licensing RE main address	$265.00 hr	0.40	0.40	$106.00
06/04/2018	Wash DPPA Swapp	Finalizing and preparing hardcopy mailing of the Notices and Subpoenas to Produce to WA Dept of Licensing and Spokane Police Dept	$265.00 hr	0.50	0.50	$132.50
06/04/2018	Wash DPPA Swapp	Correspondence with process server re: routine service in Olympia, WA and Spokane, WA	$265.00 hr	0.40	0.40	$106.00
06/05/2018	Wash DPPA Swapp	Call with Kizzie Johnson at Sweester Law re: Wilcox documents	$265.00 hr	0.20	0.20	$53.00

06/05/2018	Wash DPPA Swapp	Managing data re: Pls Initial Disclosures production	$265.00 hr	0.30	0.30	$79.50
06/05/2018	Wash DPPA Swapp	Reviewing Swapp production	$265.00 hr	1.10	1.10	$291.50
06/06/2018	Wash DPPA Swapp	Reviewing Defendants' production of class data	$265.00 hr	0.50	0.50	$132.50
06/06/2018	Wash DPPA Swapp	Preparing subpoena and notice to Washington State CJTC	$265.00 hr	0.60	0.60	$159.00
06/06/2018	Wash DPPA Swapp	Reviewing Defs production	$265.00 hr	0.80	0.80	$212.00
06/07/2018	Wash DPPA Swapp	Reviewing Defs production	$265.00 hr	1.30	1.30	$344.50
06/08/2018	Wash DPPA Swapp	Managing formal discovery files re: Defendants' Responses to Requests for Admissions and Requests for Production	$265.00 hr	0.50	0.50	$132.50
06/08/2018	Wash DPPA Swapp	Reviewing Swapp production	$265.00 hr	1.50	1.50	$397.50
06/08/2018	Wash DPPA Swapp	Preparing Notice and subpoena to WSP RE Rule 30(b)(6) Depo	$265.00 hr	0.50	0.50	$132.50
06/08/2018	Wash DPPA Swapp	Reviewing Defs production	$265.00 hr	1.00	1.00	$265.00
06/11/2018	Wash DPPA Swapp	Manage case files re: affidavit of service of subpoena to Dept of Licensing	$265.00 hr	0.10	0.10	$26.50
06/11/2018	Wash DPPA Swapp	Finalizing Notice of Depo and Subpoena to WSP	$265.00 hr	1.00	1.00	$265.00
06/11/2018	Wash DPPA Swapp	Finalizing Notice of Depo and Subpoena to WSP	$265.00 hr	0.30	0.30	$79.50
06/12/2018	Wash DPPA Swapp	Correspondence with process server RE WSP 30(b)(6) Deposition Subpoena	$265.00 hr	0.20	0.20	$53.00
06/12/2018	Wash DPPA Swapp	Manage data re: Defendants' production	$265.00 hr	0.40	0.40	$106.00
06/12/2018	Wash DPPA Swapp	Call with process server RE WSP deposition subpoena	$265.00 hr	0.20	0.20	$53.00
06/12/2018	Wash DPPA Swapp	Correspondence with court reporters RE RFP/price quote	$265.00 hr	0.30	0.30	$79.50
06/12/2018	Wash DPPA Swapp	Manage data re: Defendants' production	$265.00 hr	0.30	0.30	$79.50
06/12/2018	Wash DPPA Swapp	Editing notice of subpoena and subpoena to CJTC	$265.00 hr	0.40	0.40	$106.00
06/13/2018	Wash DPPA Swapp	Finalizing Notice and Subpoena to CJTC	$265.00 hr	0.50	0.50	$132.50
06/13/2018	Wash DPPA Swapp	Review/analyze issues re: court reporter	$265.00 hr	0.30	0.30	$79.50
06/13/2018	Wash DPPA Swapp	Correspondence with Veritext, US Legal and Esquire re: court reporter issues	$265.00 hr	0.40	0.40	$106.00
06/13/2018	Wash DPPA Swapp	Call with Seth Weissman at US Legal RE court reporter issues	$265.00 hr	0.30	0.30	$79.50
06/13/2018	Wash DPPA Swapp	Call with Randy Stein with Veritext RE court reporter issues	$265.00 hr	0.30	0.30	$79.50
06/13/2018	Wash DPPA Swapp	Call with Jason Solomon with Esquire RE court reporter price issues	$265.00 hr	0.30	0.30	$79.50
06/13/2018	Wash DPPA Swapp	Assisting with preparing for deposition of Washington State Patrol	$265.00 hr	0.90	0.90	$238.50
06/13/2018	Wash DPPA Swapp	Correspondence with Veritext, US Legal and Esquire	$265.00 hr	0.40	0.40	$106.00
06/14/2018	Wash DPPA Swapp	Assisting with preparing for deposition of Washington State Patrol	$265.00 hr	0.50	0.50	$132.50
06/14/2018	Wash DPPA Swapp	Assisting with preparing for deposition of Washington State Patrol	$265.00 hr	1.00	1.00	$265.00
06/14/2018	Wash DPPA Swapp	Assisting with preparing for deposition of Washington State Patrol	$265.00 hr	1.00	1.00	$265.00
06/14/2018	Wash DPPA Swapp	Manage data re: Wilcox v. Batiste document productions	$265.00 hr	1.00	1.00	$265.00
06/14/2018	Wash DPPA Swapp	Manage data re: Wilcox v. Batiste document productions	$265.00 hr	0.50	0.50	$132.50
06/15/2018	Wash DPPA Swapp	Manage data re: WSP document productions	$265.00 hr	2.00	2.00	$530.00
06/15/2018	Wash DPPA Swapp	Assisting with preparing for deposition of Jade Wilcox	$265.00 hr	0.50	0.50	$132.50
06/15/2018	Wash DPPA Swapp	Manage data re: WSP document production	$265.00 hr	1.00	1.00	$265.00
06/18/2018	Wash DPPA Swapp	Manage data re: Wilcox v. Batiste productions	$265.00 hr	1.50	1.50	$397.50
06/19/2018	Wash DPPA Swapp	Looking for Wilcox Initial Disclosures in Batiste and sending to Tom K	$265.00 hr	0.30	0.30	$79.50
06/20/2018	Wash DPPA Swapp	Review rough transcript of Rule 30(b)(6) deposition of WSP	$265.00 hr	0.60	0.60	$159.00

06/20/2018	Wash DPPA Swapp	Correspondence with Randy Strein at Veritext RE setting up case delivery for depositions	$265.00 hr	0.30	0.30	$79.50
06/20/2018	Wash DPPA Swapp	Reviewing technical issue with bates stamped Plaintiff 10234 document	$265.00 hr	0.30	0.30	$79.50
06/20/2018	Wash DPPA Swapp	Depo prep for Jade Wilcox deposition	$265.00 hr	0.50	0.50	$132.50
06/25/2018	Wash DPPA Swapp	Requesting court reporter for continued WSP 30(b)(6) deposition	$265.00 hr	0.20	0.20	$53.00
06/27/2018	Wash DPPA Swapp	Proofing and cite checking Reply ISO Motion to Compel Interrogatory responses	$265.00 hr	1.50	1.50	$397.50
06/27/2018	Wash DPPA Swapp	Finalizing filing of Reply ISO Motion to Compel Interrogatory Responses	$265.00 hr	0.30	0.30	$79.50
06/27/2018	Wash DPPA Swapp	Filing Reply ISO Motion to Compel Interrogatory Responses	$265.00 hr	0.30	0.30	$79.50
06/27/2018	Wash DPPA Swapp	Manage data re: Spokane Police production, CJTC production and Wilcox v. Batiste production	$265.00 hr	0.50	0.50	$132.50
06/28/2018	Wash DPPA Swapp	Finalizing and serving letter from Tom Kirchofer to Barbara D RE Interrogatory Responses	$265.00 hr	0.30	0.30	$79.50
06/28/2018	Wash DPPA Swapp	Serving hardcopy of letter from Tom Kirchofer to Barbara D RE Interrogatory Responses	$265.00 hr	0.30	0.30	$79.50
06/28/2018	Wash DPPA Swapp	Correspondence with Tom Kirchofer RE Wilcox v. Batiste productions	$265.00 hr	0.30	0.30	$79.50
06/28/2018	Wash DPPA Swapp	Manage data re: Spokane Police Dept confidential documents	$265.00 hr	0.40	0.40	$106.00
06/28/2018	Wash DPPA Swapp	Manage data re: Plaintiff's production, Spokane Police Dept production and CJTC production	$265.00 hr	0.30	0.30	$79.50
06/29/2018	Wash DPPA Swapp	Assisting with preparing for 30(b)(6) deposition of WSP	$265.00 hr	1.00	1.00	$265.00
06/29/2018	Wash DPPA Swapp	Manage data re: class data	$265.00 hr	0.50	0.50	$132.50
07/03/2018	Wash DPPA Swapp	Finalizing and serving letter to B. Duffy RE Unilateral redaction of documents and letter to S. Williams RE Topics 13 & 14 of WSP Rule 30(b)(6)	$265.00 hr	0.30	0.30	$79.50
07/10/2018	Wash DPPA Swapp	Manage case files re: 2nd Motion to Compel	$265.00 hr	0.20	0.20	$53.00
07/10/2018	Wash DPPA Swapp	Drafting notice and subpoena to CJTC RE 30(b)(6) depo	$265.00 hr	0.50	0.50	$132.50
07/10/2018	Wash DPPA Swapp	Editing notice and subpoena for CJTC 30(b)(6) depo	$265.00 hr	0.20	0.20	$53.00
07/10/2018	Wash DPPA Swapp	Drafting notice and subpoena for SPD 30(b)(6) depo	$265.00 hr	0.50	0.50	$132.50
07/11/2018	Wash DPPA Swapp	Finalizing and serving the notices of deposition and subpoenas to CJTC and SPD	$265.00 hr	1.00	1.00	$265.00
07/11/2018	Wash DPPA Swapp	Correspondence with process server re: routine service to CJTC and SPD	$265.00 hr	0.30	0.30	$79.50
07/12/2018	Wash DPPA Swapp	Drafting notice and subpoena of 30(b)(6) depo to Department of Licensing	$265.00 hr	0.50	0.50	$132.50
07/12/2018	Wash DPPA Swapp	Manage data re: Dept of Licensing document production	$265.00 hr	0.50	0.50	$132.50
07/13/2018	Wash DPPA Swapp	Finalizing and serving Notice and Subpoena of 30(b)(6) depo - Dept of Licensing	$265.00 hr	1.00	1.00	$265.00
07/17/2018	Wash DPPA Swapp	Manage data re: Defendants' reproduction of documents	$265.00 hr	0.30	0.30	$79.50
07/17/2018	Wash DPPA Swapp	Correspondence with process server RE routine service to CJTC	$265.00 hr	0.10	0.10	$26.50
07/17/2018	Wash DPPA Swapp	Email correspondence with court reporter RE Candee and Johnson depositions	$265.00 hr	0.10	0.10	$26.50
07/17/2018	Wash DPPA Swapp	Manage data re: Defendants' productions	$265.00 hr	0.30	0.30	$79.50
07/18/2018	Wash DPPA Swapp	Following up with court reporter RE service to CJTC	$265.00 hr	0.20	0.20	$53.00
07/18/2018	Wash DPPA Swapp	Correspondence with Vertext re: scheduling court reporter for CJTC deposition	$265.00 hr	0.20	0.20	$53.00
07/18/2018	Wash DPPA Swapp	Correspondence with Veritext re: scheduling court reporter for DOL deposition	$265.00 hr	0.20	0.20	$53.00
07/18/2018	Wash DPPA Swapp	Correspondence with Veritext re: scheduling Spokane Police Dept deposition	$265.00 hr	0.20	0.20	$53.00

07/18/2018	Wash DPPA Swapp	Manage data re: Defendants' production of unredacted documents	$265.00 hr	0.30	0.30	$79.50
07/18/2018	Wash DPPA Swapp	Manage formal discovery files re: Defendants' Responses to Interrogatories No. 3 & 4	$265.00 hr	0.80	0.80	$212.00
07/19/2018	Wash DPPA Swapp	Assisting with preparing for depositions of CJTC and Dept of Licensing	$265.00 hr	1.40	1.40	$371.00
07/19/2018	Wash DPPA Swapp	Discuss Affidavits ISO Class Cert with Joe and Tom and sending Tom samples	$265.00 hr	0.20	0.20	$53.00
07/20/2018	Wash DPPA Swapp	Manage deposition files re: Rule 30(b)(6) depositions of witnesses Candee and Johnson	$265.00 hr	0.30	0.30	$79.50
07/20/2018	Wash DPPA Swapp	Assisting with preparing for depositions of CJTC and Dept of Licensing	$265.00 hr	1.30	1.30	$344.50
07/20/2018	Wash DPPA Swapp	Assisting with preparing for depositions of CJTC and Dept of Licensing	$265.00 hr	1.80	1.80	$477.00
07/23/2018	Wash DPPA Swapp	Manage data re: Dept of Licensing production	$265.00 hr	0.30	0.30	$79.50
07/23/2018	Wash DPPA Swapp	Manage data re: Dept of Licensing production	$265.00 hr	0.30	0.30	$79.50
07/24/2018	Wash DPPA Swapp	Assisting with preparing for depositions of CJTC and Dept of Licensing	$265.00 hr	2.00	2.00	$530.00
07/25/2018	Wash DPPA Swapp	Assisting with preparing for depositions of CJTC and Dept of Licensing	$265.00 hr	1.00	1.00	$265.00
07/26/2018	Wash DPPA Swapp	Assisting with preparing for depositions of CJTC and Dept of Licensing	$265.00 hr	0.70	0.70	$185.50
07/26/2018	Wash DPPA Swapp	Manage data re: Wilcox v. Batiste productions	$265.00 hr	0.40	0.40	$106.00
07/27/2018	Wash DPPA Swapp	Manage deposition files re: Rule 30(b)(6) depositions of witnesses Candee and Johnson	$265.00 hr	0.30	0.30	$79.50
07/31/2018	Wash DPPA Swapp	Preparing exhibit to 2nd supplemental response ISO Motion to Compel	$265.00 hr	0.30	0.30	$79.50
07/31/2018	Wash DPPA Swapp	Reviewing Wilcox v. Batiste discovery productions	$265.00 hr	0.50	0.50	$132.50
07/31/2018	Wash DPPA Swapp	Manage data re: Wilcox v. Batiste productions	$265.00 hr	1.00	1.00	$265.00
07/31/2018	Wash DPPA Swapp	Manage data re: Wilcox v. Batiste productions	$265.00 hr	0.30	0.30	$79.50
08/01/2018	Wash DPPA Swapp	Manage data re: Washington State Patrol SECTOR Source	$265.00 hr	0.40	0.40	$106.00
08/02/2018	Wash DPPA Swapp	Drafting Index of Exhibits for Class Cert	$265.00 hr	1.00	1.00	$265.00
08/02/2018	Wash DPPA Swapp	Preparing class cert exhibits	$265.00 hr	0.50	0.50	$132.50
08/03/2018	Wash DPPA Swapp	Preparing class cert exhibits	$265.00 hr	2.50	2.50	$662.50
08/06/2018	Wash DPPA Swapp	Editing Class Cert brief	$265.00 hr	0.90	0.90	$238.50
08/06/2018	Wash DPPA Swapp	Discuss Class Cert brief and exhibits with Tom Kirchofer	$265.00 hr	0.20	0.20	$53.00
08/06/2018	Wash DPPA Swapp	Editing class cert exhibits and index of exhibits	$265.00 hr	0.50	0.50	$132.50
08/06/2018	Wash DPPA Swapp	Discuss Class Cert brief with Joe Barton	$265.00 hr	0.20	0.20	$53.00
08/06/2018	Wash DPPA Swapp	Editing and cite checking class cert brief	$265.00 hr	1.40	1.40	$371.00
08/06/2018	Wash DPPA Swapp	Preparing Tom Kirchofer Declaration ISO Class Cert	$265.00 hr	0.80	0.80	$212.00
08/06/2018	Wash DPPA Swapp	Cite checking class cert brief	$265.00 hr	1.80	1.80	$477.00
08/06/2018	Wash DPPA Swapp	Editing class cert brief, index of exhibits and Kirchofer declaration	$265.00 hr	1.00	1.00	$265.00
08/06/2018	Wash DPPA Swapp	Editing class cert brief	$265.00 hr	1.00	1.00	$265.00
08/07/2018	Wash DPPA Swapp	Editing and finalizing class cert brief	$265.00 hr	1.00	1.00	$265.00
08/07/2018	Wash DPPA Swapp	Finalizing class cert exhibits	$265.00 hr	0.80	0.80	$212.00
08/07/2018	Wash DPPA Swapp	Cite checking and finalizing motion to amend	$265.00 hr	1.00	1.00	$265.00
08/14/2018	Wash DPPA Swapp	Reviewing Batiste discovery responses	$265.00 hr	0.50	0.50	$132.50
08/23/2018	Wash DPPA Swapp	Discussing case with Matt Smith	$265.00 hr	0.30	0.30	$79.50

08/23/2018	Wash DPPA Swapp	Discussing case with Matt Smith	$265.00 hr	0.80	0.80	$212.00
08/28/2018	Wash DPPA Swapp	circulating Swapp docs to Kizzie Johnson	$265.00 hr	0.50	0.50	$132.50
08/28/2018	Wash DPPA Swapp	Call with Thomas Jarrard RE class cert exhibits	$265.00 hr	0.30	0.30	$79.50
08/29/2018	Wash DPPA Swapp	Reviewing Defs unredacted "quick peek" docs	$265.00 hr	1.00	1.00	$265.00
09/04/2018	Wash DPPA Swapp	Manage data re: Defendants productions	$265.00 hr	1.00	1.00	$265.00
09/06/2018	Wash DPPA Swapp	Manage data re: Defendants' Disclosures	$265.00 hr	0.30	0.30	$79.50
09/14/2018	Wash DPPA Swapp	Researching former Swapp employees identified on Ds disclosures	$265.00 hr	1.50	1.50	$397.50
09/17/2018	Wash DPPA Swapp	Drafting Opp to MTD Amended Complaint	$265.00 hr	0.30	0.30	$79.50
09/19/2018	Wash DPPA Swapp	Review Stipulation RE quick peek docs	$265.00 hr	0.50	0.50	$132.50
09/20/2018	Wash DPPA Swapp	Preparing charts re: MTD Complaint and MTD Amended Complaint	$265.00 hr	1.40	1.40	$371.00
09/21/2018	Wash DPPA Swapp	Preparing chart of Swapp employees identified on Ds disclosures	$265.00 hr	0.70	0.70	$185.50
09/26/2018	Wash DPPA Swapp	Manage case files re: Motion for Protective Order	$265.00 hr	0.30	0.30	$79.50
09/26/2018	Wash DPPA Swapp	Manage case files re: Defs Opp to Class Cert	$265.00 hr	0.50	0.50	$132.50
09/26/2018	Wash DPPA Swapp	Assisting with preparation for class cert hearing	$265.00 hr	1.00	1.00	$265.00
09/27/2018	Wash DPPA Swapp	Assisting with preparation for class cert hearing	$265.00 hr	1.00	1.00	$265.00
09/27/2018	Wash DPPA Swapp	Assisting with preparation for motion to dismiss amended complaint hearing	$265.00 hr	0.30	0.30	$79.50
09/27/2018	Wash DPPA Swapp	Reviewing 2nd Supplemental Disclosures	$265.00 hr	0.30	0.30	$79.50
09/28/2018	Wash DPPA Swapp	Preparing chart of MTD Amended Complaint cases	$265.00 hr	0.60	0.60	$159.00
09/28/2018	Wash DPPA Swapp	Preparing chart of MTD Amended Complaint cases by argument	$265.00 hr	2.20	2.20	$583.00
10/02/2018	Wash DPPA Swapp	Cite checking MTD Amended Complaint Opposition	$265.00 hr	2.50	2.50	$662.50
10/02/2018	Wash DPPA Swapp	Cite checking MTD Amended Complaint Opp	$265.00 hr	3.00	3.00	$795.00
10/03/2018	Wash DPPA Swapp	Editing MTD Amended Complaint Opp	$265.00 hr	0.50	0.50	$132.50
10/03/2018	Wash DPPA Swapp	Editing MTD Amended Complaint Opp	$265.00 hr	0.30	0.30	$79.50
10/03/2018	Wash DPPA Swapp	Editing MTD Amended Complaint Opp	$265.00 hr	0.50	0.50	$132.50
10/03/2018	Wash DPPA Swapp	Editing MTD Amended Complaint Opp	$265.00 hr	0.30	0.30	$79.50
10/05/2018	Wash DPPA Swapp	Correspondence with Colin Downes re SECTOR Source	$265.00 hr	0.30	0.30	$79.50
10/09/2018	Wash DPPA Swapp	Correspondence with Colin Downes re SECTOR Source	$265.00 hr	0.30	0.30	$79.50
10/11/2018	Wash DPPA Swapp	Updating Former Swapp Employee Witness list	$265.00 hr	0.50	0.50	$132.50
10/11/2018	Wash DPPA Swapp	Researching contact info for former Swapp employees	$265.00 hr	2.00	2.00	$530.00
10/30/2018	Wash DPPA Swapp	Cite checking and editing Class Cert Reply Brief	$265.00 hr	5.00	5.00	$1,325.00
10/31/2018	Wash DPPA Swapp	Cite checking and editing Class Cert Reply Brief	$265.00 hr	2.00	2.00	$530.00
10/31/2018	Wash DPPA Swapp	Cite checking and editing Class Cert Reply Brief	$265.00 hr	4.30	4.30	$1,139.50
11/07/2018	Wash DPPA Swapp	Assisting with preparing for motion to dismiss amended complaint hearing	$265.00 hr	1.00	1.00	$265.00
11/07/2018	Wash DPPA Swapp	Assisting with preparing for motion to dismiss amended complaint hearing	$265.00 hr	0.70	0.70	$185.50
11/08/2018	Wash DPPA Swapp	Assisting with preparing for motion to dismiss amended complaint hearing	$265.00 hr	4.00	4.00	$1,060.00
11/09/2018	Wash DPPA Swapp	Assisting with preparing for motion to dismiss amended complaint hearing	$265.00 hr	1.00	1.00	$265.00
11/15/2018	Wash DPPA Swapp	Assisting with preparing for motion to dismiss amended complaint hearing	$265.00 hr	1.00	1.00	$265.00
11/21/2018	Wash DPPA Swapp	Assisting with preparing for class cert hearing	$265.00 hr	0.50	0.50	$132.50
11/28/2018	Wash DPPA Swapp	Assisting with preparing for class cert hearing	$265.00 hr	0.80	0.80	$212.00

11/29/2018	Wash DPPA Swapp	Assisting with preparing for class cert hearing	$265.00 hr	2.50	2.50	$662.50
11/29/2018	Wash DPPA Swapp	Assisting with preparing for class cert hearing	$265.00 hr	4.00	4.00	$1,060.00
11/30/2018	Wash DPPA Swapp	Assisting with preparing for class cert hearing	$265.00 hr	4.00	4.00	$1,060.00
11/30/2018	Wash DPPA Swapp	Assisting with preparing for class cert hearing	$265.00 hr	1.00	1.00	$265.00
11/30/2018	Wash DPPA Swapp	Assisting with preparing for class cert hearing	$265.00 hr	1.00	1.00	$265.00
12/03/2018	Wash DPPA Swapp	Assisting with preparing for class cert hearing	$265.00 hr	1.50	1.50	$397.50
01/28/2019	Wash DPPA Swapp	Reviewing Ds production of data re: police report purchases	$265.00 hr	0.30	0.30	$79.50
01/28/2019	Wash DPPA Swapp	Reviewing Ds production of data re: police report purchases	$265.00 hr	0.50	0.50	$132.50
01/29/2019	Wash DPPA Swapp	Manage data re: Defendants' production of police report purchases	$265.00 hr	0.50	0.50	$132.50
02/01/2019	Wash DPPA Swapp	Drafting Request for Proposal re Notice Administrator	$265.00 hr	0.50	0.50	$132.50
02/01/2019	Wash DPPA Swapp	Drafting Request for Proposal re Notice Administrator	$265.00 hr	1.00	1.00	$265.00
02/01/2019	Wash DPPA Swapp	Drafting Request for Proposal for Notice Administrator	$265.00 hr	1.50	1.50	$397.50
02/07/2019	Wash DPPA Swapp	Reviewing, finalizing and emailing the Request for Proposal for Notice Administrator	$265.00 hr	0.80	0.80	$212.00
02/15/2019	Wash DPPA Swapp	Editing Request for Proposal for Notice Administrator bids	$265.00 hr	0.30	0.30	$79.50
02/19/2019	Wash DPPA Swapp	Updating Potential Notice Administrator firms re Court stay	$265.00 hr	0.20	0.20	$53.00
03/22/2019	Wash DPPA Swapp	Manage case files re: Class cert order	$265.00 hr	0.30	0.30	$79.50
04/09/2019	Wash DPPA Swapp	Manage data re: Defendants' financial information document production	$265.00 hr	1.00	1.00	$265.00
05/17/2019	Wash DPPA Swapp	Assisting with mediation preparations	$265.00 hr	0.80	0.80	$212.00
05/17/2019	Wash DPPA Swapp	Assisting with mediation preparations	$265.00 hr	1.00	1.00	$265.00
05/17/2019	Wash DPPA Swapp	Assisting with mediation preparations	$265.00 hr	1.00	1.00	$265.00
07/10/2019	Wash DPPA Swapp	Reading prior escrow agreements from American Airlines, Washington State Patrol and Wawa ESOP	$265.00 hr	1.00	1.00	$265.00
07/11/2019	Wash DPPA Swapp	Editing settlement agreement formatting	$265.00 hr	0.50	0.50	$132.50
07/16/2019	Wash DPPA Swapp	Drafting escrow agreement	$265.00 hr	1.00	1.00	$265.00
07/25/2019	Wash DPPA Swapp	Call with Jess at Sweetser Law Office re Swapp settlement check	$265.00 hr	0.30	0.30	$79.50
08/07/2019	Wash DPPA Swapp	Correspondence with Julia James re: Settlement Fund TIN	$265.00 hr	0.30	0.30	$79.50
08/07/2019	Wash DPPA Swapp	Correspondence with Joe Barton and Julia James re Application for TIN for Settlement Fund	$265.00 hr	0.30	0.30	$79.50
08/08/2019	Wash DPPA Swapp	Correspondence with EagleBank re Settlement Fund Escrow Account and Escrow Agreement	$265.00 hr	0.30	0.30	$79.50
08/09/2019	Wash DPPA Swapp	Travel to EagleBank and to deposit Settlement Fund Escrow Account	$265.00 hr	1.00	1.00	$265.00
08/22/2019	Wash DPPA Swapp	Preparing table of contents for settlement agreement	$265.00 hr	0.50	0.50	$132.50
08/26/2019	Wash DPPA Swapp	Proofreading Settlement Agreement	$265.00 hr	3.50	3.50	$927.50
08/26/2019	Wash DPPA Swapp	Preparing Settlement Certificate	$265.00 hr	0.50	0.50	$132.50
09/23/2019	Wash DPPA Swapp	Preparing chart comparing settlement administrator bid proposals	$265.00 hr	2.00	2.00	$530.00
09/24/2019	Wash DPPA Swapp	Preparing charts comparing settlement administrators bid proposal for with and without claims filing	$265.00 hr	2.00	2.00	$530.00

09/24/2019	Wash DPPA Swapp	Preparing charts comparing settlement administrators bid proposal for with and without claims filing	$265.00 hr	4.00	4.00	$1,060.00
09/25/2019	Wash DPPA Swapp	Preparing charts comparing settlement administrators bid proposal for with and without claims filing	$265.00 hr	2.50	2.50	$662.50
10/02/2019	Wash DPPA Swapp	Editing chart of bid comparisons for settlement administrator	$265.00 hr	1.00	1.00	$265.00
10/02/2019	Wash DPPA Swapp	Editing chart of bid comparisons for settlement administrator	$265.00 hr	1.00	1.00	$265.00
10/03/2019	Wash DPPA Swapp	Editing chart of bid comparisons for settlement administrator	$265.00 hr	1.50	1.50	$397.50
10/03/2019	Wash DPPA Swapp	Editing chart of bid comparisons for settlement administrator	$265.00 hr	1.00	1.00	$265.00
10/11/2019	Wash DPPA Swapp	Cite checking Motion for preliminary approval	$265.00 hr	1.40	1.40	$371.00
10/11/2019	Wash DPPA Swapp	Cite checking Motion for preliminary approval	$265.00 hr	3.50	3.50	$927.50
10/25/2019	Wash DPPA Swapp	Cite checking and editing Motion for Preliminary Approval	$265.00 hr	1.50	1.50	$397.50
10/25/2019	Wash DPPA Swapp	Editing Motion for Preliminary Approval	$265.00 hr	1.00	1.00	$265.00
10/25/2019	Wash DPPA Swapp	Finalizing exhibits for Motion for Preliminary Approval	$265.00 hr	1.00	1.00	$265.00
10/25/2019	Wash DPPA Swapp	Filing Motion for Preliminary Approval	$265.00 hr	0.50	0.50	$132.50
10/28/2019	Wash DPPA Swapp	Correspondence with Natacha Pennaneach of Eagle Bank and Kathy Schulman of James King's office regarding the Settlement Fund wire instructions	$265.00 hr	0.50	0.50	$132.50
11/15/2019	Wash DPPA Swapp	Assisting with preparing for preliminary approval hearing	$265.00 hr	1.00	1.00	$265.00
01/02/2020	Wash DPPA Swapp	Drafting Letter to EagleBank re wire transfer to Angeion	$265.00 hr	0.50	0.50	$132.50
02/18/2020	Wash DPPA Swapp	Review time records for Fee Petition	$265.00 hr	1.00	1.00	$265.00
02/19/2020	Wash DPPA Swapp	Review time records for Fee Petition	$265.00 hr	2.00	2.00	$530.00
02/20/2020	Wash DPPA Swapp	Review time records for fee petition	$265.00 hr	2.50	2.50	$662.50
02/21/2020	Wash DPPA Swapp	Review time records for Fee Petition	$265.00 hr	0.50	0.50	$132.50
02/21/2020	Wash DPPA Swapp	Review time records for Fee Petition	$265.00 hr	1.00	1.00	$265.00
		Total Labor For Ming Siegel		**267.70**	**267.70**	**$70,940.50**

Thomas Kirchofer

07/11/2017	Wash DPPA Swapp	review complaint and TRO documents.	$615.00 hr	1.80	1.80	$1,107.00
07/21/2017	Wash DPPA Swapp	read indiana decision; review statute.	$615.00 hr	1.00	1.00	$615.00
07/21/2017	Wash DPPA Swapp	prep for and conduct call w/ washington counsel re: new complaint; meet w/ joe barton re: new complaint.	$615.00 hr	1.50	1.50	$922.50
07/27/2017	Wash DPPA Swapp	review fee agreement and complaint .	$615.00 hr	0.50	0.50	$307.50
07/31/2017	Wash DPPA Swapp	review and comment on complaint.	$615.00 hr	2.00	2.00	$1,230.00
07/31/2017	Wash DPPA Swapp	draft class action complaint.	$615.00 hr	3.60	3.60	$2,214.00
08/01/2017	Wash DPPA Swapp	draft complaint.	$615.00 hr	5.70	5.70	$3,505.50
08/04/2017	Wash DPPA Swapp	edit draft complaint; email with washington counsel	$615.00 hr	1.30	1.30	$799.50
08/07/2017	Wash DPPA Swapp	draft/edit complaint	$615.00 hr	1.20	1.20	$738.00
08/08/2017	Wash DPPA Swapp	draft/edit complaint	$615.00 hr	0.70	0.70	$430.50

08/14/2017	Wash DPPA Swapp	review Swapp's documents received from Washington counsel; check docket; review cases cited by Maracich.	$615.00 hr	1.50	1.50	$922.50
08/15/2017	Wash DPPA Swapp	correspondence with washington counsel; review Swapp documents.	$615.00 hr	0.90	0.90	$553.50
08/17/2017	Wash DPPA Swapp	draft/edit complaint	$615.00 hr	0.70	0.70	$430.50
08/22/2017	Wash DPPA Swapp	check docket; attention to pro hac application	$615.00 hr	0.50	0.50	$307.50
08/24/2017	Wash DPPA Swapp	review correspondence re: waiver of service	$615.00 hr	0.20	0.20	$123.00
08/25/2017	Wash DPPA Swapp	attention to docs received in discovery; pro hac/ecf paperwork	$615.00 hr	0.60	0.60	$369.00
08/25/2017	Wash DPPA Swapp	attention to motion for PHV and WSBA documents	$615.00 hr	1.00	1.00	$615.00
09/28/2017	Wash DPPA Swapp	attention to class period; review multiple requestor spreadsheet; revision to draft parke gordon complaint.	$615.00 hr	0.90	0.90	$553.50
10/20/2017	Wash DPPA Swapp	read defendant's motion to dismiss; research response; call with j. barton re: response;	$615.00 hr	4.00	4.00	$2,460.00
10/23/2017	Wash DPPA Swapp	research re: opposition to motion to dismiss; call with co-counsel.	$615.00 hr	7.80	7.80	$4,797.00
10/24/2017	Wash DPPA Swapp	research re opposition to MTD	$615.00 hr	1.30	1.30	$799.50
10/24/2017	Wash DPPA Swapp	research/draft opposition to mtd.	$615.00 hr	0.20	0.20	$123.00
10/24/2017	Wash DPPA Swapp	research and draft opposition to MTD.	$615.00 hr	1.80	1.80	$1,107.00
10/25/2017	Wash DPPA Swapp	research and draft opposition to mtd.	$615.00 hr	7.40	7.40	$4,551.00
10/26/2017	Wash DPPA Swapp	research/draft opposition to mtd.	$615.00 hr	2.10	2.10	$1,291.50
10/26/2017	Wash DPPA Swapp	research/draft opposition to mtd.	$615.00 hr	1.60	1.60	$984.00
10/26/2017	Wash DPPA Swapp	research and draft opposition to MTD	$615.00 hr	2.10	2.10	$1,291.50
10/26/2017	Wash DPPA Swapp	research/draft opposition to motion to dismiss.	$615.00 hr	0.60	0.60	$369.00
10/27/2017	Wash DPPA Swapp	research/draft opposition to motion to dismiss.	$615.00 hr	5.30	5.30	$3,259.50
10/30/2017	Wash DPPA Swapp	opposition to mtd.	$615.00 hr	8.80	8.80	$5,412.00
11/01/2017	Wash DPPA Swapp	edit/draft opposition to motion to dismiss.	$615.00 hr	0.50	0.50	$307.50
11/02/2017	Wash DPPA Swapp	edits to opposition to MTD	$615.00 hr	0.40	0.40	$246.00
11/03/2017	Wash DPPA Swapp	call with j. barton re: motion to dismiss opposition; edits to same.	$615.00 hr	1.20	1.20	$738.00
11/06/2017	Wash DPPA Swapp	research and draft opposition to mtd; research and draft request for hearing on judicial notice.	$615.00 hr	6.00	6.00	$3,690.00
11/08/2017	Wash DPPA Swapp	review filing in Batiste case; check docket in Batiste.	$615.00 hr	0.40	0.40	$246.00
11/09/2017	Wash DPPA Swapp	research and draft opposition to request for judicial notice.	$615.00 hr	9.80	9.80	$6,027.00
11/12/2017	Wash DPPA Swapp	edits to opposition to mtd,.	$615.00 hr	1.30	1.30	$799.50
11/13/2017	Wash DPPA Swapp	attention to extrinsic documents opposition; review PI transcript.	$615.00 hr	0.60	0.60	$369.00
11/13/2017	Wash DPPA Swapp	edits to opposition to MTD	$615.00 hr	0.20	0.20	$123.00
11/13/2017	Wash DPPA Swapp	edits to opposition to MTD and Judicial Notice Opposition .	$615.00 hr	1.30	1.30	$799.50
11/13/2017	Wash DPPA Swapp	call with joe barton re opposition to motion and re: case status.	$615.00 hr	0.20	0.20	$123.00
11/15/2017	Wash DPPA Swapp	review various entries on Batiste docket.	$615.00 hr	0.50	0.50	$307.50
11/27/2017	Wash DPPA Swapp	review reply brief in support of motion to dismiss.	$615.00 hr	0.70	0.70	$430.50
12/18/2017	Wash DPPA Swapp	review pleadings on motion to dismiss	$615.00 hr	0.80	0.80	$492.00
12/20/2017	Wash DPPA Swapp	call w/ joe barton re: mtd hearing	$615.00 hr	0.40	0.40	$246.00

12/28/2017	Wash DPPA Swapp	review court's ruling on motion to amend in Batiste case.	$615.00 hr	0.10	0.10	$61.50
01/05/2018	Wash DPPA Swapp	compare answer with complaint; phone call w/ T. Jarrard re: case status.	$615.00 hr	0.90	0.90	$553.50
01/08/2018	Wash DPPA Swapp	draft discovery requests; research possible motion to strike affirmative defenses.	$615.00 hr	5.00	5.00	$3,075.00
01/09/2018	Wash DPPA Swapp	emails w/ co-counsel re: case status	$615.00 hr	0.50	0.50	$307.50
01/10/2018	Wash DPPA Swapp	attention to possible motion to strike; attention to joint status report.	$615.00 hr	1.50	1.50	$922.50
01/11/2018	Wash DPPA Swapp	research and draft letter to opposing counsel re: motion to strike	$615.00 hr	4.00	4.00	$2,460.00
01/16/2018	Wash DPPA Swapp	research, draft and edit letter to Swapp's counsel.	$615.00 hr	2.00	2.00	$1,230.00
01/18/2018	Wash DPPA Swapp	call w/ Joe Barton re: discovery requests; edits to discovery requests.	$615.00 hr	0.50	0.50	$307.50
01/19/2018	Wash DPPA Swapp	edits to document requests; draft requests for admission; email from opposing counsel re: motion to strike; call with joe barton re: discovery issues; emails with co-counsel re: discovery matters.	$615.00 hr	6.00	6.00	$3,690.00
01/22/2018	Wash DPPA Swapp	draft stipulation re: amendment of answer	$615.00 hr	2.00	2.00	$1,230.00
01/24/2018	Wash DPPA Swapp	review amended answer; research possible motion to strike.	$615.00 hr	2.50	2.50	$1,537.50
01/25/2018	Wash DPPA Swapp	research and draft motion to strike	$615.00 hr	3.00	3.00	$1,845.00
01/26/2018	Wash DPPA Swapp	research/draft motion to strike.	$615.00 hr	2.50	2.50	$1,537.50
01/28/2018	Wash DPPA Swapp	research/draft motion to strike; draft initial disclosures; attention to collection of documents for possible production in discovery.	$615.00 hr	4.00	4.00	$2,460.00
01/29/2018	Wash DPPA Swapp	draft initial disclosures and draft/edit motion to strike; attention to discovery requests.	$615.00 hr	4.00	4.00	$2,460.00
01/31/2018	Wash DPPA Swapp	draft and edit discovery requests to Swapp.	$615.00 hr	5.00	5.00	$3,075.00
02/01/2018	Wash DPPA Swapp	calls with marcus sweetser re: documents; calls with Tom Jarrard re: initial disclosures; edits to initial disclosures.	$615.00 hr	1.20	1.20	$738.00
02/05/2018	Wash DPPA Swapp	draft offensive discovery; attention to docs collected from Wash. counsel	$615.00 hr	4.50	4.50	$2,767.50
02/06/2018	Wash DPPA Swapp	draft discovery requests; draft stipulated protective order; draft motion to strike.	$615.00 hr	2.50	2.50	$1,537.50
02/07/2018	Wash DPPA Swapp	attention to offensive discovery and motion to strike.	$615.00 hr	1.50	1.50	$922.50
02/09/2018	Wash DPPA Swapp	attention to insurance docs from Swapp; attention to draft offensive discovery.	$615.00 hr	1.00	1.00	$615.00
02/12/2018	Wash DPPA Swapp	draft and edit interrogatories, motion to strike, stipulated protective order; email to opposing counsel re: oral argument.	$615.00 hr	1.70	1.70	$1,045.50
02/13/2018	Wash DPPA Swapp	review docs collected from Washington counsel; research re: ethics of contacting Swapp's former employees.	$615.00 hr	1.50	1.50	$922.50
02/13/2018	Wash DPPA Swapp	prep call for status conference; dial into status conference.	$615.00 hr	1.00	1.00	$615.00
02/13/2018	Wash DPPA Swapp	attention to motion to strike; calls with T. Jarrard and court re: same.	$615.00 hr	0.80	0.80	$492.00
02/13/2018	Wash DPPA Swapp	revise draft stipulated protective order.	$615.00 hr	0.60	0.60	$369.00
02/14/2018	Wash DPPA Swapp	call to clerk re: motion to strike; review status report and telephonic conference order.	$615.00 hr	0.40	0.40	$246.00
02/15/2018	Wash DPPA Swapp	email to opposing counsel re: stipulated protective order; call to t. jarrard re: re-filed motion to strike.	$615.00 hr	0.30	0.30	$184.50
02/20/2018	Wash DPPA Swapp	attention to revised RFA; witness interview.	$615.00 hr	0.40	0.40	$246.00
02/21/2018	Wash DPPA Swapp	research re coverage issues concerning insurer's suit against Swapp	$615.00 hr	0.50	0.50	$307.50

02/26/2018	Wash DPPA Swapp	attention to docs collected from Wash. counsel;	$615.00 hr	2.00	2.00	$1,230.00
02/27/2018	Wash DPPA Swapp	review correspondence from opposing counsel and edits to stipulated protective order; research re options for responding to Utah coverage suit.	$615.00 hr	2.70	2.70	$1,660.50
02/27/2018	Wash DPPA Swapp	call with Craig Swapp's ex-employee Kathleen Britt	$615.00 hr	0.80	0.80	$492.00
02/27/2018	Wash DPPA Swapp	memo re: call with Swapp's ex employee; review opposition to motion to strike;	$615.00 hr	0.70	0.70	$430.50
02/28/2018	Wash DPPA Swapp	research and draft reply brief	$615.00 hr	3.20	3.20	$1,968.00
02/28/2018	Wash DPPA Swapp	draft reply in support of motion to strike.	$615.00 hr	0.50	0.50	$307.50
03/01/2018	Wash DPPA Swapp	draft reply on motion to strike.	$615.00 hr	2.10	2.10	$1,291.50
03/02/2018	Wash DPPA Swapp	research and draft reply on motion to strike.	$615.00 hr	7.50	7.50	$4,612.50
03/05/2018	Wash DPPA Swapp	draft reply in support of motion to strike.	$615.00 hr	1.20	1.20	$738.00
03/06/2018	Wash DPPA Swapp	attention to drafting reply brief; research/draft letter to opposing counsel re; initial disclosures.	$615.00 hr	5.00	5.00	$3,075.00
03/07/2018	Wash DPPA Swapp	research and draft letter to opposing counsel re: initial disclosure; attention to edits to reply memo on motion to strike.	$615.00 hr	6.50	6.50	$3,997.50
03/09/2018	Wash DPPA Swapp	call w/ j. barton and t. jarrard re: discovery; attention to possible search term list; review correspondence from opposing counsel; attention to possible class cert motion	$615.00 hr	4.00	4.00	$2,460.00
03/12/2018	Wash DPPA Swapp	call with opposing counsel re; search terms; prep for call with opposing counsel; calls with J. Barton and T. Jarrard re: discovery matters.	$615.00 hr	2.40	2.40	$1,476.00
03/13/2018	Wash DPPA Swapp	review docs for production	$615.00 hr	3.90	3.90	$2,398.50
03/14/2018	Wash DPPA Swapp	review correspondence from opposing counsel.	$615.00 hr	0.20	0.20	$123.00
03/14/2018	Wash DPPA Swapp	letter to opposing counsel re: discovery; various calls among co-counsel re: discovery issues; review discovery responses from Swapp.	$615.00 hr	2.00	2.00	$1,230.00
03/15/2018	Wash DPPA Swapp	various correspondence with opposing counsel; review discovery responses; call with M. Siegel re: discovery.	$615.00 hr	1.00	1.00	$615.00
03/16/2018	Wash DPPA Swapp	research re: discovery letter to swapp; attention to upcoming document production.	$615.00 hr	2.50	2.50	$1,537.50
03/19/2018	Wash DPPA Swapp	attention to production of documents; research and draft letter to opposing counsel re: discovery issues; attention to confidentiality issues; emails with opposing counsel re: discovery issues.	$615.00 hr	5.00	5.00	$3,075.00
03/20/2018	Wash DPPA Swapp	call with jade wilcox re: discovery responses; attention to correspondence with opposing counsel; attention to drafting discovery responses; attention to protective order.	$615.00 hr	2.30	2.30	$1,414.50
03/21/2018	Wash DPPA Swapp	attention to protective order.	$615.00 hr	0.50	0.50	$307.50
03/22/2018	Wash DPPA Swapp	research and draft discovery letter to opposing counsel	$615.00 hr	4.00	4.00	$2,460.00
03/23/2018	Wash DPPA Swapp	attention to letter re: discovery issues; attention to upcoming meet and confer re: search terms; respond to discovery requests	$615.00 hr	5.50	5.50	$3,382.50
03/25/2018	Wash DPPA Swapp	attention to discovery letter to opposing counsel.	$615.00 hr	1.80	1.80	$1,107.00

03/26/2018	Wash DPPA Swapp	discovery meet and confer; follow up correspondence; work on letter re: subsequent discovery issues.	$615.00 hr	1.60	1.60	$984.00
03/26/2018	Wash DPPA Swapp	draft discovery responses; prep for discovery dispute meet and confer	$615.00 hr	4.70	4.70	$2,890.50
03/26/2018	Wash DPPA Swapp	call w/ Joe Barton re: discovery	$615.00 hr	0.30	0.30	$184.50
03/27/2018	Wash DPPA Swapp	draft discovery responses; letter to opposing counsel re: discovery issues.	$615.00 hr	5.50	5.50	$3,382.50
03/28/2018	Wash DPPA Swapp	draft discovery responses; correspondence with opposing counsel.	$615.00 hr	5.00	5.00	$3,075.00
03/30/2018	Wash DPPA Swapp	download and review document production from defendants; draft discovery responses.	$615.00 hr	0.90	0.90	$553.50
03/30/2018	Wash DPPA Swapp	respond to discovery requests.	$615.00 hr	1.70	1.70	$1,045.50
04/02/2018	Wash DPPA Swapp	attention to correspondence with opposing counsel re: discovery.	$615.00 hr	0.50	0.50	$307.50
04/02/2018	Wash DPPA Swapp	calls with Jade Wilcox; edits to discovery responses; review documents for possible production.	$615.00 hr	3.30	3.30	$2,029.50
04/03/2018	Wash DPPA Swapp	attention to upcoming discovery responses; calls w/ local counsel re same.	$615.00 hr	2.50	2.50	$1,537.50
04/04/2018	Wash DPPA Swapp	calls/emails with Washington counsel re: documents; edits/drafting to discovery responses	$615.00 hr	4.00	4.00	$2,460.00
04/05/2018	Wash DPPA Swapp	attention to discovery responses; call with K. Britt (ex-swapp employee); calls/emails with washington counsel; attention to docs received from Wash. counsel.	$615.00 hr	4.00	4.00	$2,460.00
04/06/2018	Wash DPPA Swapp	prep for and conduct call with opposing counsel; attention to discovery responses.	$615.00 hr	4.00	4.00	$2,460.00
04/09/2018	Wash DPPA Swapp	review swapp's response to RFAs; recent correspondence.	$615.00 hr	0.30	0.30	$184.50
04/11/2018	Wash DPPA Swapp	research re: class cert; attention to memo re: Swapp's ex-employee.	$615.00 hr	0.60	0.60	$369.00
04/13/2018	Wash DPPA Swapp	draft and edit discovery responses; review letter from opposing counsel.	$615.00 hr	2.00	2.00	$1,230.00
04/23/2018	Wash DPPA Swapp	prep for and conduct call with defense counsel re: discovery issues; research re: class cert issues.	$615.00 hr	6.00	6.00	$3,690.00
04/24/2018	Wash DPPA Swapp	follow up on discovery issues raised by Swapp; attention to possible discovery to WSP	$615.00 hr	3.50	3.50	$2,152.50
04/25/2018	Wash DPPA Swapp	draft offensive discovery; prep for upcoming discovery productions; emails w/ wash. counsel re: discovery issues.	$615.00 hr	4.00	4.00	$2,460.00
04/26/2018	Wash DPPA Swapp	draft letter to b. duffy re; discovery.	$615.00 hr	2.00	2.00	$1,230.00
04/27/2018	Wash DPPA Swapp	review ruling from court on motion to strike; call with J. Wilcox re: discovery issues; review docs for production; emails w/ Wash. counsel re: same; review docket filings in Batiste case.	$615.00 hr	4.00	4.00	$2,460.00
04/30/2018	Wash DPPA Swapp	attention to upcoming doc production; review docs for production; research re: class cert	$615.00 hr	4.00	4.00	$2,460.00
05/01/2018	Wash DPPA Swapp	review docs for production and priority and confidentiality; letter to b. duffy re: discovery.	$615.00 hr	2.30	2.30	$1,414.50
05/02/2018	Wash DPPA Swapp	review documents for priority/confidentiality and for production.	$615.00 hr	1.90	1.90	$1,168.50
05/02/2018	Wash DPPA Swapp	attention to upcoming discovery productions.	$615.00 hr	0.70	0.70	$430.50

05/03/2018	Wash DPPA Swapp	edit/draft discovery requests in Batiste case; draft settlement demand; review insurance documents; check docket in D. Utah insurance company case.	$615.00 hr	3.90	3.90	$2,398.50
05/04/2018	Wash DPPA Swapp	attention to doc production; correspond w/ opposing counsel.	$615.00 hr	2.00	2.00	$1,230.00
05/07/2018	Wash DPPA Swapp	attention to production of documents	$615.00 hr	0.50	0.50	$307.50
05/09/2018	Wash DPPA Swapp	draft subpoena to WSP.	$615.00 hr	0.50	0.50	$307.50
05/10/2018	Wash DPPA Swapp	draft subpoena to WSP; calls with co-counsel re: same; draft joint motion to continue class cert deadline; emails w/ co-counsel re: same; call/email with Jade Wilcox re: possible settlement demand; review docs produced by defendants	$615.00 hr	5.50	5.50	$3,382.50
05/14/2018	Wash DPPA Swapp	attention to motion to continue class cert deadline; attention to service of insurance docs; attention to doc review tech issues;	$615.00 hr	1.00	1.00	$615.00
05/15/2018	Wash DPPA Swapp	correspond w/ Wash. counsel re: doc production issues; draft letter to opposing counsel; attention to doc collection/production; attention to supplemental discovery responses.	$615.00 hr	3.20	3.20	$1,968.00
05/16/2018	Wash DPPA Swapp	attention to letter to opposing counsel and amended discovery response; correspond w/ local counsel re: discovery.	$615.00 hr	1.00	1.00	$615.00
05/21/2018	Wash DPPA Swapp	review swapp's document production; call with Joe Barton re: case status; review swapp's discovery responses.	$615.00 hr	4.40	4.40	$2,706.00
05/21/2018	Wash DPPA Swapp	research and draft motion to compel interrogatories	$615.00 hr	1.50	1.50	$922.50
05/22/2018	Wash DPPA Swapp	meet w/ joe barton re: case status; emails with T. Jarrard re: various fact issues.	$615.00 hr	1.20	1.20	$738.00
05/22/2018	Wash DPPA Swapp	research and draft motion to compel	$615.00 hr	5.30	5.30	$3,259.50
05/23/2018	Wash DPPA Swapp	emails to co-counsel re: various discovery issues; attention to drafting new subpoenas; draft and edit motion to compel; emails to opposing counsel re: discovery; letter to opposing counsel re: discovery.	$615.00 hr	5.60	5.60	$3,444.00
05/24/2018	Wash DPPA Swapp	research re: class cert issues; prepare affidavits in support of motion to compel; edits to letter to opposing counsel	$615.00 hr	4.00	4.00	$2,460.00
05/25/2018	Wash DPPA Swapp	email to opposing counsel re: discovery; review new production from defense; email to J. Sweetser re: motion to quash;	$615.00 hr	3.00	3.00	$1,845.00
05/29/2018	Wash DPPA Swapp	research and draft class cert brief; edits to motion to compel; emails with co-counsel re: motion to quash and re: various discovery.	$615.00 hr	4.30	4.30	$2,644.50
05/30/2018	Wash DPPA Swapp	attention to class cert brief; attention to production from WSP	$615.00 hr	1.10	1.10	$676.50
05/30/2018	Wash DPPA Swapp	prep for WSP depo; work on class cert brief.	$615.00 hr	3.00	3.00	$1,845.00
05/31/2018	Wash DPPA Swapp	attention to WSP's document production.	$615.00 hr	1.00	1.00	$615.00
06/01/2018	Wash DPPA Swapp	call with S. WIlliams at Washington State Patrol re: discovery; prep for depo of WSP; review WSP documents.	$615.00 hr	3.00	3.00	$1,845.00
06/04/2018	Wash DPPA Swapp	edits to motion to quash sweetser subpoenas; review wsp documents; prep for WSP deposition; draft WSP 30-b-6 notice.	$615.00 hr	6.80	6.80	$4,182.00
06/05/2018	Wash DPPA Swapp	research/draft/edit objections to sweetser subpoena.	$615.00 hr	2.00	2.00	$1,230.00
06/06/2018	Wash DPPA Swapp	work on wsp depo prep; emails with other counsel re: same; work on WSP 30-b-6 notice; edits to motion to compel.	$615.00 hr	3.70	3.70	$2,275.50

06/07/2018	Wash DPPA Swapp	attention to depo scheduling.	$615.00 hr	0.20	0.20	$123.00
06/07/2018	Wash DPPA Swapp	edits to 30-b-6 notice to WSP.	$615.00 hr	1.00	1.00	$615.00
06/07/2018	Wash DPPA Swapp	attention to prep for 30-b-6 depo of WSP	$615.00 hr	2.90	2.90	$1,783.50
06/07/2018	Wash DPPA Swapp	edits to 30-b-6 notice.	$615.00 hr	0.60	0.60	$369.00
06/08/2018	Wash DPPA Swapp	attention to subpoenas to third parties.	$615.00 hr	0.40	0.40	$246.00
06/11/2018	Wash DPPA Swapp	work on prepping for WSP 30-b-6 depo.	$615.00 hr	4.00	4.00	$2,460.00
06/12/2018	Wash DPPA Swapp	prep for WSP 30b6; calls with Seattle counsel re CJTC subpoena production location; attention to upcoming document productions; correspondence w/ WSP counsel re: upcoming deposition; review/draft correspondence w/ opposing counsel re: discovery issues.	$615.00 hr	2.00	2.00	$1,230.00
06/12/2018	Wash DPPA Swapp	prep for WSP 30-b-6	$615.00 hr	0.50	0.50	$307.50
06/13/2018	Wash DPPA Swapp	review docs received from state; prep for WSP 30b6	$615.00 hr	6.00	6.00	$3,690.00
06/14/2018	Wash DPPA Swapp	prep for 30-b-6 deposition; organize documents for 30-b-6 deposition	$615.00 hr	4.50	4.50	$2,767.50
06/15/2018	Wash DPPA Swapp	review documents from discovery record; attention to letter to opposing counsel re: discovery issues; prep for 30-b-6 depo; organize docs for 30-b-6 depo.	$615.00 hr	4.90	4.90	$3,013.50
06/17/2018	Wash DPPA Swapp	prep for 30-b-6 depo; organize and assemble exhibits; travel from Boston to Olympia, WA	$615.00 hr	8.00	8.00	$4,920.00
06/18/2018	Wash DPPA Swapp	take 30-b-6 depo of Wash. State Patrol	$615.00 hr	9.00	9.00	$5,535.00
06/19/2018	Wash DPPA Swapp	travel from Seattle to Boston; edits to interrogatory responses in Batiste case; call with counsel for criminal justice training commission;	$615.00 hr	4.20	11.20	$6,888.00
06/20/2018	Wash DPPA Swapp	email to counsel for CJTC re: discovery issues; review ints to Wilcox in Batiste case; review objections to Sweetser subpoena; attention to prep for Jade Wilcox depo prep; work on class cert brief.	$615.00 hr	5.00	5.00	$3,075.00
06/21/2018	Wash DPPA Swapp	work on reply brief in support of discovery motion; attention to prep for upcoming depos; work on class cert motion.	$615.00 hr	7.00	7.00	$4,305.00
06/22/2018	Wash DPPA Swapp	research and draft and edit reply in support of discovery motion; various calls/emails w/ Spokane counsel re: discovery issues and re: Wilcox deposition.	$615.00 hr	5.40	5.40	$3,321.00
06/25/2018	Wash DPPA Swapp	draft motion for class cert; prep for next 30-b-6 depo; revisions to reply on discovery motion.	$615.00 hr	4.00	4.00	$2,460.00
06/26/2018	Wash DPPA Swapp	attention to correspondence from Spokane PD and from Wash. AG.	$615.00 hr	0.20	0.20	$123.00
06/26/2018	Wash DPPA Swapp	calls with Wash. AG's office re: discovery; attention to correspondence with counsel to the Department of Licensing.	$615.00 hr	1.20	1.20	$738.00
06/26/2018	Wash DPPA Swapp	email to the DOL's counsel re: subpoena; edits to reply brief	$615.00 hr	2.20	2.20	$1,353.00
06/26/2018	Wash DPPA Swapp	attention to exhibits/affidavit in support of reply on motion to compel.	$615.00 hr	0.50	0.50	$307.50
06/27/2018	Wash DPPA Swapp	research, draft, edit letter to opposing counsel re: discovery issues; attention to edits/drafting on reply in support of motion to compel; review docs produced by third parties under RUle 45; prep for next 30-b-6 depo.	$615.00 hr	7.00	7.00	$4,305.00
06/28/2018	Wash DPPA Swapp	prep for 30-b-6 deposition.	$615.00 hr	3.00	3.00	$1,845.00
06/28/2018	Wash DPPA Swapp	review recent doc productions; prep for 30-b-6 of WSP.	$615.00 hr	4.20	4.20	$2,583.00

06/29/2018	Wash DPPA Swapp	prep for upcoming 30-b-6; call with counsel for Spokane PD re: discovery; correspond with counsel for WSP re: discovery issues; correspond w/ counsel for CJTC re: discovery issues.	$615.00 hr	5.00	5.00	$3,075.00
07/01/2018	Wash DPPA Swapp	prep for 30-b-6 and organize documents for same.	$615.00 hr	4.00	4.00	$2,460.00
07/01/2018	Wash DPPA Swapp	travel to olympia washington	$615.00 hr	8.00	8.00	$4,920.00
07/02/2018	Wash DPPA Swapp	take 30-b-6 depo of wash state patrol.	$615.00 hr	8.50	8.50	$5,227.50
07/02/2018	Wash DPPA Swapp	draft second motion to compel;	$615.00 hr	3.00	3.00	$1,845.00
07/03/2018	Wash DPPA Swapp	attention to second motion to compel.	$615.00 hr	2.50	2.50	$1,537.50
07/03/2018	Wash DPPA Swapp	travel from Seattle to Boston	$615.00 hr	7.00	7.00	$4,305.00
07/05/2018	Wash DPPA Swapp	emails with counsel for third parties re: depositions/discovery; draft motion for class cert; read J. WIlcox deposition.	$615.00 hr	6.20	6.20	$3,813.00
07/06/2018	Wash DPPA Swapp	draft motion for class cert; review discovery docs.	$615.00 hr	4.00	4.00	$2,460.00
07/09/2018	Wash DPPA Swapp	emails/calls to CJTC counsel, DOL counsel, defense counsel, Spokane Police counsel and Spokane local counsel re: discovery re: discovery schedule; research/draft/edit motion for class cert; prep for upcoming rounds of depos.	$615.00 hr	5.80	5.80	$3,567.00
07/10/2018	Wash DPPA Swapp	research/draft motion for class cert;attention to depo subpoenas; calls/emails w/ opposing counsel and third-party counsel re: various discovery issues.	$615.00 hr	6.50	6.50	$3,997.50
07/11/2018	Wash DPPA Swapp	attention to third-party depo subpoenas; correspond w/ third-party counsel; research/draft motion for class cert.	$615.00 hr	7.50	7.50	$4,612.50
07/12/2018	Wash DPPA Swapp	correspond w/ third party counsel re: discovery issues; research/draft/edit class cert motion; prep for upcoming depos.	$615.00 hr	7.50	7.50	$4,612.50
07/13/2018	Wash DPPA Swapp	research/draft/edit class cert motion; review depo transcripts; call with spokane counsel re: batiste depo	$615.00 hr	7.00	7.00	$4,305.00
07/16/2018	Wash DPPA Swapp	call with opposing counsel re discovery issues; draft/edit class cert brief.	$615.00 hr	6.20	6.20	$3,813.00
07/17/2018	Wash DPPA Swapp	review docs produced by defendants; research and draft motion for class cert; attention to correspondence with opposing counsel re: motion to compel;	$615.00 hr	7.50	7.50	$4,612.50
07/18/2018	Wash DPPA Swapp	prep for DOL deposition; correspondence with counsel to DOL and CJTC re: depo; research/draft edit class cert motion.	$615.00 hr	7.50	7.50	$4,612.50
07/19/2018	Wash DPPA Swapp	prep for SPD, DOL and CJTC depositions, and draft prep memos re: same; call with CJTC counsel re 30-b-6 depo; attention to affidavit from jade wilcox re: class cert; draft/edit class cert motion;	$615.00 hr	7.30	7.30	$4,489.50
07/19/2018	Wash DPPA Swapp	attention to correspondence w/ defense counsel re: reply deadline;	$615.00 hr	0.20	0.20	$123.00
07/20/2018	Wash DPPA Swapp	research/draft/edit class cert motion.	$615.00 hr	7.00	7.00	$4,305.00
07/20/2018	Wash DPPA Swapp	draft motion to extend deadline for reply brief; calls/emails with opposing counsel re: same; draft stipulation re: extension of reply deadline;	$615.00 hr	1.00	1.00	$615.00
07/22/2018	Wash DPPA Swapp	research re: possible amended complaint.	$615.00 hr	1.50	1.50	$922.50
07/24/2018	Wash DPPA Swapp	attention to prep for CJTC/DOL depositions.	$615.00 hr	1.00	1.00	$615.00
07/25/2018	Wash DPPA Swapp	attention to production of SECTOR source code.	$615.00 hr	0.50	0.50	$307.50
07/26/2018	Wash DPPA Swapp	attention to docs received from third parties; emails with co-counsel re: firm bio.	$615.00 hr	0.40	0.40	$246.00

07/29/2018	Wash DPPA Swapp	draft wilcox affidavit and draft amended complaint.	$615.00 hr	6.00	6.00	$3,690.00
07/30/2018	Wash DPPA Swapp	attention to correspondence re: docs reviewed by WSP witnesses; various prep for DOL deposition; attention to errata sheets from prior depos; research and draft and revise class cert memo; attention to class cert exhibits.	$615.00 hr	5.00	5.00	$3,075.00
07/30/2018	Wash DPPA Swapp	research/draft reply memo on discovery dispute;	$615.00 hr	3.00	3.00	$1,845.00
07/31/2018	Wash DPPA Swapp	attention to drafting/revision/research on class cert motion.	$615.00 hr	11.00	11.00	$6,765.00
07/31/2018	Wash DPPA Swapp	attention to drafting/revision of motion to compel reply brief	$615.00 hr	2.00	2.00	$1,230.00
08/01/2018	Wash DPPA Swapp	attention to amended complaint; attention to affidavits of counsel in support of class cert motion; emails with Jade Wilcox re: affidavit in support of class cert motion;	$615.00 hr	7.00	7.00	$4,305.00
08/02/2018	Wash DPPA Swapp	emails with opposing counsel re: amended complaint; research/draft motion to amend;	$615.00 hr	7.00	7.00	$4,305.00
08/03/2018	Wash DPPA Swapp	revisions to affidavits in support of class cert; call with Jade Wilcox re: signing declaration in support of class cert.; read SPD and DOL depo transcripts;	$615.00 hr	2.50	2.50	$1,537.50
08/05/2018	Wash DPPA Swapp	revise class cert brief; correct fact citations to the record; read SPD depo.	$615.00 hr	7.00	7.00	$4,305.00
08/06/2018	Wash DPPA Swapp	revise and edit class cert brief and supporting documents; check fact citations; edits to affidavits in support of class cert.; revisions to motion to amend the complaint.	$615.00 hr	5.00	5.00	$3,075.00
08/06/2018	Wash DPPA Swapp	update various cites in class cert brief; revisions/edits to same; edits to supporting docs; draft/edit/revise motion to amend the complaint.	$615.00 hr	4.00	4.00	$2,460.00
08/13/2018	Wash DPPA Swapp	review docs produced by CJTC, and review T. Johnson errata.	$615.00 hr	1.00	1.00	$615.00
08/14/2018	Wash DPPA Swapp	attention to stipulation re: amended complaint; email to opposing counsel re: CJTC production; research re: effect of substantive changes in errata sheets.	$615.00 hr	2.50	2.50	$1,537.50
08/22/2018	Wash DPPA Swapp	review swapp's production of unredacted documents; email to opposing counsel re: "quick peek" documents; research re: standards for errata sheet motions to strike.	$615.00 hr	6.00	6.00	$3,690.00
08/23/2018	Wash DPPA Swapp	memo to matt smith re: case status; research and draft memo re: errata sheet issues; phone calls with matt smith re: various case status issues.	$615.00 hr	6.00	6.00	$3,690.00
08/24/2018	Wash DPPA Swapp	attention to tallying hours on second motion to compel.	$615.00 hr	1.00	1.00	$615.00
08/24/2018	Wash DPPA Swapp	research re: errata sheet changes	$615.00 hr	0.70	0.70	$430.50
			Total Labor For Thomas Kirchofer	**645.60**	**652.60**	**$401,349.00**

Thomas G. Jarrard
LAW OFFICE OF THOMAS JARRARD, PLLC
1020 N. Washington Street
Spokane, WA 99201
Telephone: (425) 239-7290
Email: Tjarrard@att.net

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JADE WILCOX, on behalf of herself and all others similarly situated, Plaintiffs, v. SWAPP LAW, PLLC, d/b/a CRAIG SWAPP AND ASSOCIATES, and JAMES CRAIG SWAPP, individually, Defendants	Case No. 2:17-cv-275-RMP Related to Case No. 2:17-cv-122-RMP **DECLARATION OF THOMAS G. JARRARD IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Thomas G. Jarrard, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am competent to testify and make this declaration based on my personal knowledge.

2. I am a member of Class Counsel in this lawsuit.

3. My ordinary practice is focused on veterans' rights and Uniformed Services Employment and Reemployment Rights Act ("USERRA") class action litigation. In the past thirteen years, I have successfully litigated and resolved dozens of USERRA and veterans matters across the United States.

4. I am admitted to practice in Washington State, the U.S. District Courts for the Eastern and Western Districts of Washington, the District of Colorado, the District of Nebraska, the Western District of Tennessee, the District of Wisconsin, the Norther District of Illinois, the U.S. Courts of Appeals for the Fifth, Seventh, Eighth, Ninth, Tenth, Eleventh and Federal Circuit Court of Appeals, the Merit Systems Protection Board, and the U.S. Supreme Court.

5. I have served as co-class counsel or putative class counsel in numerous federal class action lawsuits and one state class action lawsuit, including cases against across the United States. *See e.g. Worcester v. County of Spokane*, 2010 U.S. Dist. LEXIS 82881 (E.D. Wash. Aug. 10, 2010); *Birkholz v. Billings Clinic*, 2011 U.S. Dist. LEXIS 56992 (D. Mont. May 27, 2011)(prevailing at summary judgment); *Jones v. Marriott Hotel Servs*., 2013 U.S. Dist. LEXIS 13831 (N.D. Cal. Jan. 31, 2013)

(prevailing at summary judgment); *Podliska v U.S. House of Representatives, Committee on the Events Surrounding The 2012 Terrorist Attach in Benghazi; and Trey Gowdy,* 1:15-cv-02037 (D.C. 2015); *Hanson v. Kitsap County,* 2:13-cv-5388-RJB (W.D. Wash. March 16, 2015) (jury verdict and finding of willful violation of USERRA in failure to promote retaliation case).

6. In addition to individual cases, I have served as lead or co-lead counsel in several USERRA class action lawsuits against United Airlines, American Airlines, the Washington State Patrol, and L3 Communications Incorporated and Southwest Airlines. The United Airlines case involved over 1,200 service members and settled for $6.15 million. *See Tuten v. United Airlines, Inc.*, 41 F. Supp. 3d 1003, 1006 (D. Colo. 2014) (D. Colo. 2014). The American case involved approximately 1,150 service members and settled for approximately $7.5 million. *See Allman v. American Airlines, Inc. Pilot Retirement Benefit Program Variable Income Plan, et. al.* 1:14-cv-10138 (D. Mass. 2014). The L3 Communication case settled for $2 million and was certified a class for discrimination affecting up to 250 service members. *See Hall v. L3 Communications, Inc., et al.*, 15-cv-00231-SAB (E.D. Wash. 2017). The Southwest Airlines case involved over 1,500 pilots and approximately 18 million in recovered benefits.

Huntsman v. Southwest Airlines, Inc., 17-cv-03972-JD N.D. Cal.2017). The Washington State Patrol case involved approximately 900 state troopers and was settled for $15 million in back-pay and retirement benefits.

7. The Law Office of Thomas G. Jarrard, PLLC is listed as one of Spokane's "Top Lawyers" in Spokane Coeur d'Alene Living Magazine for six years running. The law firm received a 10/10 "Superb" rating from the Avvo legal rating forum, and holds "Preeminent" Client and Peer Review ratings at Martindale-Hubble.

8. I was selected as a Rising Star by Super Lawyers for Military/Veterans Law and Appellate Law in 2016 and 2017. "Rising Star" is a peer-review driven accolade that is based on jury verdicts, settlements, and representative clients and is awarded to only 2.5% of attorneys who have practiced law for ten years or less.

9. Prior to opening my practice, I served as a felony prosecutor for Spokane County Prosecutor's Office. Prior to service as a prosecutor, I served in a two-year clerkship at the Washington State Court of Appeals, Division III. I received my JD from Gonzaga University School of Law in 2007 and an MBA from the Columbia College School of Business in 2000. During law school, I served as an associate editor for the Gonzaga Journal of International Law and as a Thomas More Scholar.

10. I am an accredited attorney for claims against the U.S. Department of Veterans Affairs and my law firm is certified by the Washington State Department of Veterans Affairs as a Service Disabled Veteran Owned Business. My law firm is a

first referral among veteran affinity groups, including the Reserve Officers Association of America, the Disabled American Veterans and the Military Order of the Purple Heart and I am a life member in each of these organizations.

11. I co-authored the Reserve Officers Association of America, Law Center *amicus curiae* brief to the Supreme Court of the United States in the case of *Staub v. Proctor Hospital*, 131 S.Ct. 1186 (2011). I have written on behalf *amicus curie* and service members in USERRA appeals before the New Mexico Court of Appeals and Supreme Court; the Merit Systems Protection Board; the Fifth, Seventh, Eighth, Ninth, Tenth, Eleventh, and the Federal Circuits.

12. I instruct at local and national continuing legal education seminars and I authored the following articles: Proving a Violation of Section 4311 of USERRA: *A Case Study*, ROA L. Rev. 170161 (2017); Tax Records in USERRA: *How Both Parties May Obtain Each Other's Private Financial Records*, ROA L. Rev. 11029 (2011); *USERRA and Federal Rule of Civil Procedure 68, Offer of Judgment: Awards of Plaintiff's Attorney Fees and Prohibition of Charging Costs Under USERRA Are Not Affected by Rule 68*, ROA L. Rev. 1082 (2010). I am a contributor to Kathryn Piscitelli & Edward Still, The USERRA Manual: Uniformed Services Employment & Reemployment Rights (2012-2020 editions).

13. I am a founding member and the past Chair of the Washington State Veterans Bar Association, a minority bar association representing veterans' interests and advocacy in the practice of law.

14. My office and other members of Class Counsel began working on this matter in 2016, when I was consulted by James Sweetser regarding the ethics of certain advertising strategies that Mr. Swapp engaged in this lawsuit. Since then, my office continued to develop the class case in conjunction with the Sweetser law Office and Block and Leviton.

15. My compensation for services rendered in this case and reimbursements of my expenses is wholly contingent the outcome. My practice consists entirely of contingency cases (typically 1/3 recovery terms), hourly work on appellate matters, and pro bono or deeply discounted hourly rates in disabled veteran matters.

16. My 2019-2020 hourly rate is $450 per hour. My reasonable billing rates over the past several years have been $250–$350 per hour in State Court matters and $350–$500 per hour in federal court class litigation, or pro bono in disabled veteran matters.

17. Numerous federal district courts have approved my current hourly rates of $350–$500 in performing a lodestar crosscheck. In Denver, Colorado the Senior District Court Judge approved $450 as reasonable within the market. *Tuten v. United Airlines*, 41 F. Supp. 3d 1003 (D. Colo. 2014). I was also awarded $350 an hour as a

reasonable fee in 2014 and 2015 in settlements supervised by federal magistrates in Virginia and Montana federal courts. I was awarded $350 an hour as a reasonable attorney fee rate following the (second) jury trial in *Hanson v. Cty. of Kitsap, Wash.*, No. 13 Civ. 5388, 2015 WL 3965829, at *4 (W.D. Wash. June 30, 2015). I was awarded $425 an hour as a reasonable fee in *Allman v. American Airlines, Inc. Pilot Retirement Program Variable Income Plan*, No. 14-cv-10138, ECF No. 110 (D. Mass. February 15, 2017). My rate has since increased to reflect the intervening years of experience. Last year in this district my $500 rate hourly rate was found to be reasonable in a similar sized class. *See Hall v. L3 Communications, Inc., et al.*, 15-cv-00231-SAB (E.D. Wash. Aug. 2, 2019) (250 Class members and $2 million recovery). In *Huntsman v. Southwest Airlines, Inc.*, 17-cv-03972-JD N.D. Cal. Oct. 4, 2019) my rate of $500 was approved by the court in performing a lodestar crosscheck.

18. To litigate this case efficiently, my Co-Class Counsel and I coordinated the work to avoid unnecessary duplication of effort. For example, Attorneys from only one of the two Class Counsel appeared at any deposition. Prior to filing the pending motion, counsel from each firm also reviewed time entries and removed time entries for duplicative or unnecessary work that ordinarily would not be billed to a paying client.

19. My firm's work on this case included interviewing the plaintiff, developing and preparing discovery, investigating the facts, and reviewing documents

in support of the consumers who eventually became members of the Settlement Class. I conducted strategy sessions with co-counsel and prospective co-counsel in pre-litigation to develop a case plan. I conducted frequent discussions with the class representative (in some cases on a weekly basis), and coordinated and assisted the class representative in the preparation of her declarations and defending her depositions. I prepared legal memoranda, planned and reviewed draft pleadings, assisted in the preparation of the complaint and conducted pre-litigation research of the Defendants. I prepared argument, legal support and research for settlement negotiations held before Judge Suko in at the Yakima Courthouse. I assisted in the preparation of the settlement documents, and in the motion for preliminary approval of the settlement.

20. Throughout this matter I maintained the time I worked on this matter, entered the time into a computer database and client records in such a manner to reflect each discrete, non-administrative, and completed task from 2016 to present. As illustrated in the following table, I recorded 253.00 hours of my time on this matter through February 14, 2020.

Name	**Title**	**Rate**	**Hours**	**Fee**
Thomas G. Jarrard	Attorney/Partner	$450.00	253.00	$113,850.00
Robert A. Jarrard	Legal Assistant	$ 75.00	43.5	$ 3,262.50
Total				**$117,112.50**

21. Attached hereto as Exhibit A is an accurate copy of my record of time in this matter.

22. Throughout this matter, I also maintained the records for the expenses I incurred in such a manner to reflect each discrete cost attributed to this case from 2012 to present. Throughout this case, I spent $2,401.03 on expenses, excluding, meals, legal research fees, and PACER access costs. The following table provides a summary of the expenses incurred by The Law Office of Thomas G. Jarrard, PLLC through March 29, 2019.

Cost Description	**Amount**
Case binders	$ 200.00
Hotel	$ 131.03
Travel	$ 120.00
West Economics Report	$ 1,350.00
Pro hac fee for co-counsel	$ 200.00
Pro hac fee for co-counsel	$ 200.00
Pro hac fee for co-counsel	$ 200.00
Total	**$ 2,401.03**

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

DATED February 24, 2020.

/s/ Thomas G. Jarrard
Thomas G. Jarrard

Exhibit A

Law Office of Thomas G. Jarrard

2/14/2020

	Date	Time minutes	Activity
1	11/20/2016	60	Meet with Jim and Markus re DPPA class case and strategy
2	12/20/2016	120	Review Draft Complaint with Markus
3	3/7/2017	6	2 emails between team, Wilcox v. Swapp - letter to opposing counsel, Attachment
4	7/7/2017	60	Disco Conference in Batiste for date on Class members to USE in SWAPP
5	8/3/2017	60	Meet with Jade re case and agreement
6	8/7/2017	30	Meeting on call with Barton and Sweetser re class case strategy
7	8/9/2017	3	ECF Document review, 1, COMPLAINT -- CLASS ACTION FOR DAMAGES AND OTHER RELIEF UNDER THE DRIVER'S PRIVACY PROTECTION ACT…
8	8/10/2017	3	ECF Document Review, Notice of Judge Assignment. Judge Rosanna Malouf Peterson assigned to case.
9	8/10/2017	3	ECF Document review, 2, Summons Issued as to James Craig Swapp, Swapp Law PLLC
10	8/22/2017	3	ECF document review, 3, NOTICE of Appearance by Barbara J Duffy on behalf of All Defendants
11	8/22/2017	3	Barbara Duffy to team, Request for Waiver
12	8/22/2017	3	ECF Document review, 4, SUMMONS Returned Executed by Jade Wilcox re Swapp Law PLLC
13	8/22/2017	3	ECF Document review, 5, SUMMONS Returned Executed by Jade Wilcox re Swapp Law PLLC
14	8/23/2017	3	Joseph Barton email to team, Wash DPPA Additional Target
15	8/23/2017	3	Carl Warring to team, Call items from today
16	8/23/2017	3	Barbara Duffy to team, Request for waiver of service
17	8/23/2017	3	Janet Wiley to team, Wilcox v. Swapp -- Letter and Waiver of Service, Attachment
18	8/23/2017	3	Thomas Jarrard to team, Request for Waiver of service forms attached
19	8/23/2017	9	3 emails between team, Wilcox v. Swapp, Attachment
20	8/23/2017	15	5 emails between team, Swapp Firm waiver attached, Attachment
21	8/25/2017	12	4 emails between team, Request for Waiver of service forms attached, Attachment
22	8/25/2017	3	Thomas Jarrard to team, Wilcox v. Swapp -- Letter and Waiver of Service, Attachment
23	8/25/2017	3	Ming Siegel to team, Case 2:17-cv-00275-RMP Wilcox v. Swapp et al, Attachment
24	8/25/2017	3	ECF document review, 6, WAIVER OF SERVICE Returned Executed by Jade Wilcox re James Craig Swapp
25	8/25/2017	3	ECF document review, 7, WAIVER OF SERVICE Returned Executed by Jade Wilcox re Swapp Law PLLC
26	8/25/2017	9	3 emails between team, Wilcox v. Swapp, Attachment
27	8/28/2017	3	Paygovadmin to team, Pay.gov Payment Confirmation….
28	8/28/2017	9	3 emails between team, Case 2:17-cv-00275-RMP Wilcox v. Swapp et al
29	8/28/2017	3	Ming Siegel to team, Pro Hac
30	8/28/2017	3	Paygovadmin to team, Pay.gov Payment Confirmation….
31	8/28/2017	3	ECF document review, 8, MOTION to Appear Pro Hac Vice re Attorney: R. JOSEPH BARTON.
32	8/28/2017	3	ECF document review, 9, MOTION to Appear Pro Hac Vice re Attorney: THOMAS W. KIRCHOFER
33	8/28/2017	3	Joseph Barton to team, Pro Hac
34	8/28/2017	3	ECF Document review, 10, text-only order
35	8/29/2017	3	Ming Siegel to team,Wash DPPA Swapp: J Leviton PHV, Attachment
36	8/29/2017	3	Paygovadmin to team, Pay.gov Payment Confirmation….
37	8/29/2017	3	ECF document review, 11, MOTION to Appear Pro Hac Vice re Attorney: Jason M. Leviton
38	8/29/2017	6	2 emails between team, Wash DPPA Swapp: J Leviton PHV
39	8/29/2017	3	Thomas Jarrard to team, Wash DPPA Retainer, Attachment
40	8/30/2017	3	ECF document review, 12, text only order granting ECF No. 9
41	8/31/2017	3	Ming Siegel to team, Retainer Agreement for Parke Gordon…, Attachment
42	9/1/2017	3	ECF document review, 13, NOTICE of Appearance by Ryan P McBride on behalf of James Craig Swapp, Swapp Law PLLC
43	9/6/2017	6	2 emails between team, Swapp, Attachment
44	9/11/2017	15	5 emails between team, Case 2:17-cv-00275
45	9/11/2017	3	ECF Document review, 14, Text Only Order granting ECF No. 11
46	9/18/2017	9	3 emails between team, Swapp Pro Hac Check
47	9/19/2017	15	5 emails between team, Parke Gordon, Attachment
48	10/19/2017	15	5 emails between team, Wilcox v. Swapp
49	10/20/2017	3	ECF document review, 15, MOTION to Dismiss for Failure to State a Claim
50	10/20/2017	3	ECF document review, 16, DECLARATION by Ryan P. McBride in Support

51	11/1/2017	60	review of motion to dismiss
52	11/2/2017	3	Marcus Sweetser to team, I can't Locate a public website with either of them
53	11/2/2017	33	11 emails between team, Wilcox v. Swapp mtn to dismiss strategy session Monday, Attachment
54	11/3/2017	180	Edits to Mtn. to Dismiss
55	11/6/2017	60	Hall deposition
56	11/6/2017	120	Review review mtn. to dismiss
57	11/7/2017	3	email to team
58	11/7/2017	120	Notes and memo on Motion to Dismiss
59	11/13/2017	3	Joseph Barton ton team, Wilcox v. OPP to judicial Notice, Attachment
60	11/13/2017	63	21 emails between team, Wilcox v. Swapp Mtn To Dismiss Opp., Attachment
61	11/13/2017	3	ECF Document Review, 17, MEMORANDUM in Opposition re 15 MOTION to Dismiss for Failure to State a Claim
62	11/13/2017	3	ECF Document review, 18, RESPONSE to Motion re 15 MOTION to Dismiss for Failure to State a Claim
63	11/14/2017	3	Thomas Jarrard to team, Oral Argument
64	11/15/2017	15	5 emails between team, Swapp Oral Argument
65	11/27/2017	3	ECF Document Review, 19, REPLY MEMORANDUM re 15 MOTION to Dismiss for Failure to State a Claim
66	11/28/2017	3	Joseph Barton to team, Wilcox v. Swapp Mtn to Dismiss Opp., Attachment
67	12/11/2017	9	3 emails between team, Swapp 12 b Argument Dec 20
68	12/18/2017	45	prep for hearing on mtn to dismiss
69	12/19/2017	9	3 emails between team, Your Travel
70	12/20/2017	3	ECF document review, 20, Minute Entry for proceedings held before Judge Rosanna Malouf Peterson
71	12/20/2017	3	ECF document review, 21, ORDER Denying 15 Defendants' Motion to Dismiss for Failure to State a Claim
72	12/20/2017	90	Hearing with Joe on Mtn to Dismiss
73	1/4/2018	3	ECF document review, 22, ANSWER to Complaint with jury demand.
74	1/4/2018	3	Thomas Jarrard to team, Case 2:17-cv-00275-RMP Wilcox v. Swapp et al
75	1/5/2018	3	ECF Document review, 23, SCHEDULING CONFERENCE NOTICE
76	1/8/2018	6	2 emails between team, SWAPP rule 26, Attachment
77	1/9/2018	3	Thomas Jarrard to team, DPPA: Swapp, Park Gordon & Other Cases
78	1/9/2018	3	Thomas Jarrard to team, Swapp case, Attachment
79	1/9/2018	3	Thomas Jarrard to team, Swapp case, Attachment
80	1/9/2018	3	Thomas Jarrard to team, Swapp JST, Attachment
81	1/9/2018	3	Joseph Barton to team, Swapp case: Magistrate Judge, Attachment
82	1/9/2018	3	Joseph Barton to team, Swapp Rule 26 report, Attachment
83	1/10/2018	3	Thomas Jarrard to team, JSR proposed, Attachment
84	1/11/2018	3	Thomas Kirchofer to team, DPPA: Swapp, Parke Gordon & Other Cases, Attachment
85	1/12/2018	9	3 emails between team, Swapp Rule 26(f) conference, attachment
86	1/12/2018	24	8 emails between team, Discovery Plan and Joint Status Certificate
87	1/12/2018	3	Joseph Barton to team, Swapp Rule 26(f) conference, attachment
88	1/15/2018	12	4 emails between team,WSP Rule 26(f)/JSR Report, Attachment
89	1/16/2018	3	Joseph Barton to team, Swapp Letter re Motion to strike off defense
90	1/16/2018	3	WSP Rule 26 JSR Report document review
91	1/16/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp, Attachment
92	1/16/2018	3	Barbara Duffy to team, Rule 26 Discovery Conference, Attachment
93	1/18/2018	3	Joseph Barton to team, DPPA: SWAPP & Parke Gordon
94	1/18/2018	6	2 emails between team, Discovery Plan and Joint Status Certificate, Attachment
95	1/22/2018	9	3 emails between team, Affirmative Defenses
96	1/22/2018	21	7 emails between team, Wilcox v. Swapp - Affirmative Defenses
97	1/23/2018	3	ECF document review, 24, Amended ANSWER to Complaint with jury demand
98	1/24/2018	6	2 emails between team, Swapp Answers to complaint
99	1/24/2018	3	Ryan McBride email with, Attachment
100	1/24/2018	3	Thomas Jarrard to team, Harvey v Gordon Complaint
101	1/25/2018	6	2 emails between team, Swapp Sample Confidentiality Agreement, Attachment

102	1/26/2018	18	6 emails between team, Swapp Discovery Plan and Joint Status Report
103	1/26/2018	6	2 emails between team, Wilcox v. Swapp
104	1/29/2018	3	Thomas Kirchofer to team, DPPA - Wilcox's Accident Reports
105	1/29/2018	3	Thomas Kirchofer to team, Swapp Discovery Plan and Joint Status Report, Attachment
106	1/29/2018	3	Elizabeth Calkins to team, Wilcox, Attachment
107	1/29/2018	6	2 emails between team, Discovery Plan and Joint Status Certificate, Attachment
108	1/29/2018	6	2 emails between team, Swapp Discovery Plan and Joint Status Report
109	1/29/2018	3	Thomas Kirchofer to team, Wilcox
110	1/29/2018	60	Meeting with team
111	1/30/2018	3	Thomas Kirchofer to team, Wilcox
112	1/31/2018	39	13 emails between team, Wilcox v. Swapp..., Attachment
113	1/31/2018	3	ECF document review, 25, Joint Certificate Pursuant to LR 26.1 / LR 16.1
114	1/31/2018	3	Joseph Barton to team, Wilcox/DPPA cases
115	1/31/2018	3	Thomas Kirchofer to team, Wilcox - document collection
116	1/31/2018	60	Review of JSR
117	1/31/2018	60	Review of Discovery
118	2/1/2018	9	3 emails between team, Initial Disclosure, Attachment
119	2/1/2018	6	2 emails between team, Wilcox v. Swapp
120	2/1/2018	3	Kizzy Christenson to team, Wilcox
121	2/1/2018	60	Review initial disclosures
122	2/1/2018	3	ECF Document review, 26, RULE 7.1 CORPORATE DISCLOSURE STATEMENT
123	2/2/2018	3	Joseph Barton to team, Outta Town
124	2/2/2018	3	Thomas Kirchofer to team, Wilcox
125	2/2/2018	12	4 emails between team, Wilcox v. Swapp- final draft of rule 36
126	2/2/2018	9	3 emails between team, Wilcox v. Swapp: Discovery Plan...
127	2/2/2018	3	Thomas Kirchofer top team, Draft document requested, Attachment
128	2/2/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp, Attachment
129	2/2/2018	3	Janet Wiley to team, Wilcox v. swap -- Swapp disclosures, Attachment
130	2/5/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - final draft of rule 36..., Attachment
131	2/5/2018	3	Joseph Barton to team, Swapp Rule 26 initial disclosures, Attachment
132	2/5/2018	9	3 emails between team, Wilcox vs. Swapp -- Swapp Disclosures
133	2/5/2018	12	4 emails between team, Proposed Protective Order
134	2/5/2018	9	3 emails between team, Swapp protective order
135	2/5/2018	60	Work on motion to strike
136	2/6/2018	9	3 emails between team, Wilcox v. Swapp - protective order
137	2/6/2018	3	Thomas Jarrard to team, Agreement Regarding Confidentiality combined edits, Attachment
138	2/9/2018	6	2 emails between team, Wilcox v. Swapp -- proposed Protective Order
139	2/9/2018	9	3 emails between team, Wilcox v. Swapp - Second Set of RFAs, Attachment
140	2/10/2018	12	4 emails between team, Wilcox v. Swapp -- Insurance
141	2/11/2018	3	Joseph Barton to team, DPPA Claim
142	2/11/2018	3	Joseph Barton to team, DPPA : Voice Message from
143	2/12/2018	6	2 emails between team, Swapp: Form Declining Magistrate, Attachment
144	2/12/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Oral Argument Scheduling
145	2/12/2018	3	Ming Siegel to team, Swapp 1st set of interrogatories, Attachment
146	2/12/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Oral Argument Scheduling, Attachment
147	2/12/2018	3	Thomas Kirchofer to team, Swapp: Motion to Strike Clean, Attachment
148	2/12/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Oral argument Date
149	2/12/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - protective order, Attachment
150	2/12/2018	3	Joseph Barton to team, Wilcox v. Swapp - Oral Argument Scheduling, Attachment
151	2/13/2018	30	Ming Siegel to team, Swapp: Motion to strike clean, Attachment Review
152	2/13/2018	9	3 emails between team, Wilcox v. Swapp: - Oral argument date

153	2/13/2018	3	ECF document review, 27, MOTION to Strike 24 Answer to Complaint
154	2/13/2018	21	7 emails between team, Wilcox v. Swapp - Oral Argument Scheduling
155	2/13/2018	60	Edits to motion to strike
156	2/14/2018	9	3 emails between team, Swapp, Attachment
157	2/14/2018	3	ECF document review, 28, Minute Entry for TELEPHONIC proceedings held before Judge Rosanna Malouf Peterson:
158	2/14/2018	20	Rule 26 with court
159	2/14/2018	45	prep and hearing with Court Re Case Scehule, with joe and Kirchofer
160	2/14/2018	3	ECF Document review, 29, JURY TRIAL SCHEDULING ORDER
161	2/15/2018	12	4 emails between team, Wilcox v. Swapp, Attachment
162	2/15/2018	3	Ming Siegel to team, Please email me the word version of the Swapp Mtn to strike Tom filed, Attachment
163	2/15/2018	3	ECF document review, 30, Praecipe filed by Jade Wilcox: Re 27 MOTION to Strike 24 Answer to Complaint
164	2/15/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - stipulated protective order, Attachment
165	2/15/2018	6	2 emails between team, Case 2:17-cv-00275
166	2/22/2018	12	4 emails between team, Discovery Requests
167	2/26/2018	3	Wilcox v. Swapp Extension of time to respond to discovery, Attachment
168	2/27/2018	3	Wilcox v. Swapp Extension of time to respond to disco
169	2/27/2018	3	Thomas Jarrard to team, Swapp Review of PO Done, Attachment
170	2/27/2018	3	ECF document review, 31, RESPONSE to Motion re 27 MOTION to Strike 24 Answer to Complaint
171	2/27/2018	6	2 emails between team,Wilcox v. Swapp Extension of Time to Respond to Discovery, Attachment
172	2/27/2018	60	review and edit Protective Orders
173	2/28/2018	3	Joseph Barton to team, Parke Gordon : Mediation Letter, Attachment
174	3/2/2018	3	Joseph Barton to team, Wilcox v. Swapp Extension of Time to Respond to Discovery
175	3/2/2018	3	Joseph Barton to team, Wilcox v. Swapp: Stipulated Protective Order, Attachment
176	3/5/2018	3	Thomas Kirchofer to team, Swapp - Reply Brief
177	3/6/2018	15	5 emails between team, Swapp Reply Brief - Footnote Spacing
178	3/6/2018	3	Ming Siegel to team, Wash DPPA Swapp: Reply ISO Motion to Strike, Attachment
179	3/6/2018	3	ECF document review, 32, REPLY MEMORANDUM re 27 MOTION to Strike 24 Answer to Complaint
180	3/7/2018	6	2 emails between team, Wilcox, et al. v. Swapp Law -- Ds Letter & Responses to RFAs and RFPs, Attachment
181	3/7/2018	15	5 emails between team, Wilcox, et al. v. Swapp Law -- Discovery
182	3/7/2018	6	2 emails between team, Swapp: Plaintiff's 2nd set of RFA
183	3/7/2018	3	ECF document review, 33, NOTICE of Appearance by Kristin Beneski on behalf of James Craig Swapp, Swapp Law PLLC
184	3/7/2018	9	3 emails between team, Wilcox v. Swapp - Document question
185	3/7/2018	6	2 emails between team, Defendants' First interrogatories and requests for production, Attachment
186	3/8/2018	6	2 emails between team, Defendants' First Interrogatories and Requests for Production
187	3/8/2018	3	Ming Siegel to team, Swapp: Letter RE Initial Disclosures, Attachment
188	3/8/2018	6	2 emails between team, Wash DPPA - new case
189	3/9/2018	9	3 emails between team, Wilcox et al. v. Swapp law et al., Attachment
190	3/9/2018	3	Joseph Barton to team, Wilcox et al v. Swapp -- Discovery search
191	3/9/2018	6	2 emails between team, Swapp Stuff, Attachment
192	3/9/2018	3	Thomas Jarrard to team, Protective order items, Attachment
193	3/9/2018	9	3 emails between team, Wilcox et al v. Swapp -- Discovery Search Terms
194	3/9/2018	6	2 emails between team, Swapp Enemy Disco Requests, Attachment
195	3/9/2018	3	Joseph Barton to team, Swapp: Protective order, Attachment
196	3/9/2018	3	Barbara Duffy to team, Wilcox et al v. Swapp -- Discovery Search Terms & Custodians , Attachment
197	3/9/2018	3	Janet Wiley to team, Wilcox et al. v. Swapp Law et al. Ltr and link to documents, Attachment
198	3/9/2018	3	Janet Wiley to team, Wilcox v. Swapp Law -- Password to document link
199	3/10/2018	6	2 emails between team, Swapp: Protective order, Attachment
200	3/10/2018	3	Joseph Barton to team, Swapp: Call re: search terms..., Attachment
201	3/11/2018	3	Joseph Barton to team, Wilcox v. Swapp Law -- Protective Order, Attachment
202	3/12/2018	6	3 emails between team, Swapp: Protective order, Attachment
203	3/12/2018	6	3 emails between team, l Swapp: Search Terms, Attachment

204	3/12/2018	6	2 emails between team, Wilcox et al v. Swapp -- Call re: Search Terms & Custodians
205	3/12/2018	6	2 emails between team, Not Privileged, Attachment
206	3/12/2018	3	Thomas Kirchofer to team, Swapp - Letter to Duffy
207	3/12/2018	60	Call with Joe Barton
208	3/13/2018	3	Joseph Barton to team, Swap: Email/ Letter
209	3/13/2018	3	Joseph Barton to team, DPPA Potential Cases, Attachment
210	3/13/2018	6	2 emails between team, Wilcox v. Swapp - Document question
211	3/13/2018	9	3 emails between team, Swapp: Client Names Not Privileged, Attachment
212	3/13/2018	3	Janet Wiley to team, Wilcox et al. v. Swapp Law et al., Attachment
213	3/14/2018	6	2 emails between team, Swapp: Search Terms
214	3/14/2018	15	5 emails between team, Wilcox v. Swapp Protective Order, Attachment
215	3/14/2018	3	Thomas Kirchofer to team, Swapp: Search Terms
216	3/14/2018	3	Janet Wiley to team, Wilcox v. Swapp Law et al...., Attachment
217	3/14/2018	3	Janet Wiley to team, Wilcox v. Swapp et al..., Attachment
218	3/14/2018	3	Wilcox v. Swapp Law et al.--File site Password
219	3/14/2018	3	Thomas Kirchofer to team, Wilcox, Attachment
220	3/14/2018	9	3 emails between team, Swapp: Email/Letter re: Search terms
221	3/14/2018	3	Thomas Kirchofer to team,Ogden v. Public Utility District No. 2 of Grant County, Attachment
222	3/14/2018	6	2 emails between team, Swapp Protective Order -- Compare, Attachment
223	3/14/2018	3	Thomas Kirchofer to team, Wilcox et al. v. Swapp Law et al.
224	3/14/2018	3	Janet Wiley to team, Wilcox v. Swapp et al..., Attachment
225	3/14/2018	3	Joseph Barton to team, Wilcox v. Swapp Law Protective Order, Attachment
226	3/14/2018	150	hearing prep
227	3/15/2018	3	Joseph Barton to team, Swapp: Defendants' Response to Plaintiff's First Set of Interrogatories
228	3/15/2018	3	Joseph Barton to team, Swapp -- Proposed Order on Class Certification
229	3/15/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Spreadsheet
230	3/15/2018	3	Thomas Kirchofer to team, Wilcox, Attachment
231	3/15/2018	3	Thomas Kirchofer to team, Swapp: Defendants' Responses to Plaintiff's First Set of interrogatories
232	3/15/2018	3	Joseph Barton to team, Swapp Motion to strike
233	3/15/2018	3	Kristin Beneski to team, Wilcox v. swap - Search Terms
234	3/15/2018	9	3 emails between team, Swapp -- Proposed Order on Class Certification, Attachment
235	3/15/2018	9	3 emails between team, Wilcox, Attachment
236	3/15/2018	21	7 emails between team, Swapp - Spreadsheet, Attachment
237	3/15/2018	9	3 emails between team, Wilcox, Attachment
238	3/16/2018	3	Joseph Barton to team, Swapp - Spreadsheet, Attachment
239	3/16/2018	9	3 emails between team, Wilcox v. Swapp - Search Terms
240	3/16/2018	3	ECF document review, 34, Minute Entry for proceedings held before Judge Rosanna Malouf Peterson
241	3/16/2018	3	ECF document review, 35, ORDER AMENDING CLASS CERTIFICATION BRIEFING SCHEDULE
242	3/16/2018	90	prep and hearing and Argue Mtn to Strike Affirm Defenses
243	3/18/2018	6	2 emails between team, Wilcox v. Swapp - Jade Wilcox
244	3/19/2018	3	Joseph Barton to team, Swapp: Hearing 4/16
245	3/19/2018	3	Kristin Beneski to team, Wilcox v. swap - Search Terms
246	3/19/2018	6	2 emails between teams, Swapp: Plaintiff's Initial Disclosures Production
247	3/19/2018	6	2 emails between team, Swapp: Defendants' Responses to Plaintiff's First Set of Interrogatories
248	3/19/2018	3	Joseph Barton to team, Wilcox v. Swapp Law Protective Order
249	3/20/2018	3	Barbra Duffy to team, Wilcox v. swap Law Protective Order
250	3/20/2018	27	9 emails between team, Wilcox v. Swapp - Search terms, Attachment
251	3/20/2018	3	Thomas Kirchofer to team, are you trying to call
252	3/20/2018	3	Thomas Kirchofer to team, Discovery requests to team, Attachment
253	3/20/2018	3	Janet Wiley to team, Wilcox et al. v. Swapp Law et al., Attachment
254	3/20/2018	3	Thomas Jarrard to team, Swapp

255	3/20/2018	24	8 emails between team, Swapp JOINT MOTION ON PROTECTIVE ORDER
256	3/20/2018	60	Case work on Swapp
257	3/21/2018	15	5 emails between team, Swapp, Attachment
258	3/21/2018	3	Thomas Kirchofer to team, Wilcox et al v. Swapp Law et al.
259	3/21/2018	3	ECF document review, 36,Stipulated MOTION for Protective Order by All Defendants
260	3/21/2018	9	3 emails between team, Wilcox et al. v. Swapp Law et al., Attachment
261	3/21/2018	6	2 emails between team, Electronic Ambulance Chasing, Attachment
262	3/21/2018	3	ECF document review, 37, ORDER granting 36 Stipulated Motion for Protective Order. Signed by Judge Rosanna Malouf Peterson
263	3/21/2018	3	ECF document review, 38, PROTECTIVE ORDER. Signed by Judge Rosanna Malouf Peterson.
264	3/22/2018	3	Joseph Barton to team, Electronic Ambulance Chasing, Attachment
265	3/22/2018	15	5 emails between team, Wilcox v. Swapp Law
266	3/22/2018	3	James Sweetser to team, Electronic Ambulance Chasing, Attachment
267	3/22/2018	12	4 emails between team, Wilcox v. Swapp Law
268	3/24/2018	18	6 emails between team, Electronic Ambulance Chasing, Attachment
269	3/26/2018	12	4 emails between team, Wilcox et al. v. Swapp Law et al.
270	3/26/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Discovery letter, Attachment
271	3/26/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Today's Call
272	3/26/2018	3	Joseph Barton to team, Wilcox et al. v. Swapp Law et al.
273	3/26/2018	3	Elizabeth Calkins to team, Wilcox v. Swapp
274	3/26/2018	3	Thomas Jarrad to team, ESI Terms and conditions, Attachment
275	3/26/2018	3	Wilcox v. Swapp - Discovery letter, Attachment
276	3/26/2018	3	Kizzy Christensen to team, Wilcox v. Swapp, Attachment
277	3/26/2018	6	2 emails between team, Wilcox v. Swapp - Discovery Letter, Attachment
278	3/26/2018	6	2 emails between team, Thomas Kirchofer to team, Wilcox et al. v. Swapp Law et al., Attachment
279	3/26/2018	9	3 emails between team, Wilcox v. Swapp - Today's Call, Attachment
280	3/26/2018	18	6 emails between team, Wilcox v. Swapp - Today's call, Attachment
281	3/26/2018	12	4 emails between team, Wilcox v. Swapp - Discovery letter, Attachment
282	3/26/2018	60	review and editing of document
283	3/27/2018	6	2 emails between team, Wilcox et al. v. Swapp law et al., Attachment
284	3/27/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Jade Wilcox
285	3/28/2018	18	6 emails between team, Wilcox et al. v. Swapp Law et al.
286	3/29/2018	3	ECF document review, 39, NOTICE of Appearance by Marcus Sweetser on behalf of Jade Wilcox
287	3/29/2018	3	Thomas Kirchofer to team, What's up?
288	3/29/2018	3	Thomas Kirsch offer to team, What's Up? DPPA cases, Attachment
289	3/29/2018	3	Thomas Kirchofer to team, What's Up? DPPA cases, Attachment
290	3/29/2018	9	3 emails between team, Wilcox v. Swapp - Jade Wilcox
291	3/29/2018	3	Janet Wiley to team, Wilcox v. Swapp: Password to link
292	3/30/2018	3	Wilcox et al. v. Swapp Law et al., Attachment
293	3/30/2018	6	2 emails between team, Kizzy Johnson to team, Wilcox v. Swapp - Jade Wilcox
294	4/4/2018	6	2 emails between team, Wilcox v. Swapp
295	4/4/2018	9	3 emails between team, Wilcox v. Swapp: Defendants letter
296	4/4/2018	3	Thomas Kirchofer to team, Jade Wilcox - Documents
297	4/4/2018	12	4 emails between team, Wilcox v. Swapp: Defendants Letter
298	4/4/2018	3	Wilcox v. Swapp - Interrogatory Response, Attachment
299	4/5/2018	3	Thomas Kristopher to team, Wilcox v. WSP PL Initial disclosures, Attachment
300	4/5/2018	3	Marcus Sweetser to team, Dropbox link
301	4/5/2018	3	Thomas Kirchofer to team, Thomas Kirchofer Shared a file
302	4/5/2018	48	6 emails between team, drobox link
303	4/5/2018	15	5 emails between team, Wilcox v. Swapp - Re Dropbox link, Attachment
304	4/5/2018	3	Thomas Jarrard to team, Wilcox v. Batiste Confidentiality agreement, Attachment, revoiew so we can use in the Swapp case
305	4/6/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp, Attachment

306	4/6/2018	3	Janet Wiley to team, Wilcox v. Swapp Law Plaintiff's Second Set of RFA..., Attachment
307	4/6/2018	3	Joseph Barton to team, Wilcox v. Swapp - Follow up
308	4/7/2018	3	Joseph Barton to team, Swapp Ds Production - Invoices & Accident Reports
309	4/9/2018	3	Barbara Duffy to team, Wilcox v. Swapp
310	4/9/2018	9	3 emails between team, Wilcox v. Swapp: Plaintiff's Productions of Documents
311	4/11/2018	18	6 emails between team, Wilcox v. Swapp - Call from Ex-Swapp Employees, Attachment
312	4/13/2018	6	2 emails between team, Wilcox v. Swapp - Certification, Attachment
313	4/15/2018	9	3 emails between team, Wilcox et al., Attachment
314	4/18/2018	3	Thomas Kristopher to team, re Wilcox v. Batiste disco plan
315	4/18/2018	6	2 emails between team, Swapp: P Production to Ds
316	4/18/2018	42	14 emails between team, Wilcox et al. v. Swapp et al., Attachment
317	4/18/2018	3	Matthew Crotty to team, Settlement Term Sheet, Attachment
318	4/18/2018	3	Thomas Jarrard to team, SWAPP, Attachment
319	4/18/2018	90	Rule 37 case review
320	4/20/2018	15	5 emails between team, Proposed Time To Discuss Plaintiff's, Attachment
321	4/23/2018	12	4 emails between team, Swapp - -Discovery Meet and Confer, Attachment
322	4/23/2018	9	3 emails between team, Wilcox v. Swapp - Call
323	4/23/2018	60	Disco Call with team
324	4/23/2018	60	Disco with Defense
325	4/24/2018	3	Mike Casey to team, GU Law armed services club
326	4/24/2018	3	Thomas Kirchofer to team, Swapp v. Wilcox - Documents
327	4/24/2018	3	Thomas Kirchofer to team, Swapp v. Wilcox - documents
328	4/24/2018	21	7 emails between team, Pavone v. Meyerkord LLC, Attachment
329	4/24/2018	3	Janet Wilcox to team, Wilcox et al. v. Swapp Law et al, Attachment
330	4/24/2018	9	3 emails between team, Swapp v. Wilcox - Documents
331	4/24/2018	6	2 emails between team, Swapp - Accident Std. Procedures, Attachment
332	4/24/2018	21	7 emails between team, Swapp - Accident Report Std. Procedures, attachment
333	4/25/2018	6	2 emails between team, Swapp v. Wilcox - Documents
334	4/25/2018	3	Thomas Kirchofer to team Swapp: Batiste tag, Attachment
335	4/26/2018	18	6 emails between team, swap v. Wilcox - Documents.
336	4/26/2018	6	2 emails between team, Case 2:17-cv-00275-RMP Wilcox v. Swapp et al Order on Motion to Strike, Attachment
337	4/26/2018	3	Thomas Jarrard to team, Bamm!!!, Attachment
338	4/26/2018	3	ECF Document review, 40, ORDER GRANTING IN PART 27 PLAINTIFF'S MOTION TO STRIKE DEFENDANTS' FIFTH AND EIGHTH AFFIRMATIVE DEFENSES
339	4/27/2018	9	3 emails between team, Swapp v. Wilcox - Documents
340	4/27/2018	3	Marcus Sweetser to team, Case 2:17-cv-00275-RMP Wilcox v. Swapp et al Order on Motion to Strike
341	4/27/2018	3	Joseph Barton to team, Swapp Order on Motion to Strike
342	4/27/2018	3	Joseph Barton to team, Case 2:17-cv-00275-RMP Wilcox v. Swapp et al Order on Motion to Strike
343	4/27/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Call with jade, Attachment
344	4/27/2018	6	2 emails between team, Wilcox v. Swapp - one last document,Attachment
345	4/27/2018	3	Thomas Kirchofer Wilcox v. Swapp
346	5/1/2018	3	Ming Siegel to team, Swapp: Letter from Thomas K. to Barbara D. , Attachment, Attachment
347	5/2/2018	3	Ming Siegel tot team, Swapp: Plaintiff's Production - Plaintiff000150-Plaintiff005610
348	5/2/2018	3	Thomas Kirsch offer to team, Wilcox v. Swapp Question, Attachment
349	5/3/2018	3	Kristin Beneski to team, Wilcox v. Swapp Law, Et al.
350	5/3/2018	15	5 emails between team, Swapp - Settlement Demand, Attachment
351	5/3/2018	15	5 emails between team, Swapp - Settlement Demand, Attachment
352	5/3/2018	3	James Sweetser to team, Swapp - Settlement Demand
353	5/4/2018	9	3 emails between team, Wilcox v. Swapp question, Attachment
354	5/4/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp Law, et al., Attachment
355	5/4/2018	9	3 emails between team, Swapp: Plaintiff's Production
356	5/7/2018	6	2 emails between team, Wilcox, Attachment

357	5/7/2018	3	Kizzy Johnson to team, Wilcox v. Swapp question
358	5/7/2018	3	Kristin Beneski to team, Wilcox v. Swapp Law et al.
359	5/7/2018	12	4 emails between team, Swapp: Plaintiff's Production - Plaintiff007066-7159 & Wilcox000031-36
360	5/9/2018	3	ECF document review, 41, ANSWER to Complaint with jury demand.
361	5/9/2018	6	2 emails between team, Wilcox v. Swapp..., Attachment
362	5/10/2018	3	Joseph Barton to team, Swapp - Settlement Demand
363	5/10/2018	9	3 emails between team, Wilcox v. Swapp: Status of Defendants...
364	5/10/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp...
365	5/10/2018	9	3 emails between team, Wilcox v. Swapp - Subpoena..., Attachment
366	5/10/2018	3	Kristen Beneski to team, Attachment
367	5/10/2018	3	Kristin Beneski to team, Password
368	5/10/2018	3	Thomas Jarrard to team, Issuance of 3rd Party Subpoena, Attachment
369	5/10/2018	3	Ming Siegel top team, Swapp: Plaintiff's Notice of Subpoena to Washington..., Attachment
370	5/10/2018	12	4 emails between team, Wilcox v. Swapp - Motion to continue..., Attachment
371	5/10/2018	3	Barbara Duffy to team, Wilcox v. Swapp Law...
372	5/10/2018	3	ECF document review, 42, Praecipe filed by All Defendants : Re 41 Answer to Complaint.
373	5/11/2018	3	Ming Siegel to team, Wilcox v. Swapp: Settlement demand letter, Attachment
374	5/13/2018	15	5 emails between team, Wilcox v. Swapp et al..., Attachment
375	5/14/2018	12	4 emails between team, Swapp Stipulated Motion to enter Stipulated Order
376	5/14/2018	9	3 emails between team, Wilcox v. Swapp - Subpoena, Attachment
377	5/14/2018	3	Thomas Kirchofer to team, Swapp Stipulated Motion to Enter Stipulated Order, Attachment
378	5/15/2018	6	2 emails between team, Swapp: Plaintiff007160
379	5/15/2018	3	ECF document review, 43, Joint MOTION to Extend Deadlines
380	5/15/2018	3	ECF document review, 44, ORDER GRANTING 43 Motion to Extend Class Certification Deadlines
381	5/15/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Docs
382	5/16/2018	3	James Sweetser to team, Ambulance chasers in Tri-Cities, Attachment
383	5/16/2018	3	Marcus Sweetser to team, Final Version of Jade's Rog Responses, Attachment
384	5/16/2018	9	3 emails between team, Wilcox v. Swapp Law PLLC
385	5/16/2018	3	Thomas Jarrard to team, Final Version of Jade's Rog Responses, Attachment
386	5/16/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp Law PLLC
387	5/16/2018	24	8 emails between team, Final version of Jade's Rog Responses, Attachment
388	5/18/2018	6	2 emails between team, Wilcox v. Swapp Write
389	5/21/2018	60	Manage Subpoena to Sweetser for review and discussion with Marcus Sweetser
390	5/22/2018	3	Joseph Barton to team, Swapp Subpoena to James Sweetser...
391	5/22/2018	33	11 emails between team, Wilcox v. Swapp Law PLLC, attachment
392	5/22/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Docs.
393	5/23/2018	6	2 emails between team, Wilcox v. Swapp - police question
394	5/23/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - depo of the WSP
395	5/23/2018	3	Casey to team, FOIA request
396	5/23/2018	6	2 emails between team, Wilcox v. Swapp - police question
397	5/23/2018	3	Marcus Sweetser to team, Final Version of Jade's Rog Responses, Attachment
398	5/23/2018	6	2 emails between team, Wilcox v. Swapp - docs.
399	5/23/2018	3	Marcus Sweetser to team, Wilcox v. Swapp - depo of the wasp
400	5/23/2018	12	4 emails between team, Final version of Jade's Rog Responses, Attachment
401	5/23/2018	30	2 emails between team, Wilcox v. Swapp - Batiste Admissions, review for Sswapp case use
402	5/23/2018	6	2 emails between team, Wilcox v. Swapp - Defendant's Response, Attachment
403	5/23/2018	3	Kizzy Johnson to team, Wilcox v. Swapp - docs., Attachment
404	5/23/2018	12	4 emails between team, Plaintiff's Production
405	5/23/2018	12	4 emails between team, Wilcox v. Swapp - Defendants' Responses to Interrogatories 13-17.
406	5/24/2018	3	Ming Siegel to team, Swapp: Letter from Thomas Kirchofer to team, Attachment
407	5/24/2018	3	Kristin Beneski to team, Wilcox et al. v. Swapp Law et al, Attachment

408	5/24/2018	3	Kristine Beneski to team, Wilcox v. Swapp - Defendants' Responses to Interrogatories 13-17.
409	5/24/2018	3	Kristine Beneski to team, Password
410	5/25/2018	3	Halley Williams to team, Issuance of 3rd Party Subpoena, Attachment, Discussion with Jim Re approach to Subpooena and hire outside counsel
411	5/25/2018	3	Marcus Sweetser to team, Mtn to Quash, Attachment
412	5/25/2018	30	Thomas Jarrard to team, Work product outline, Attachment
413	5/25/2018	15	5 emails between team, Wilcox v. Swapp - Defendants' Responses to Interrogatories…
414	5/25/2018	6	2 emails between team, WSP response to 3rd party subpoena-Wilcox
415	5/29/2018	15	5 emails between team, Draft Motion to Quash, attachment
416	5/29/2018	6	2 emails between team, Plaintiff's Production
417	5/29/2018	3	Janet Wiley to team, Wilcox v. Swapp Law et al, Attachment
418	5/29/2018	3	Thomas Jarrard to team,012-3-623 – ePlus Inc. v. Lawson Software Inc. | Fulltext Opinions
419	5/30/2018	6	2 emails between team, Wilcox v. Swapp, Attachment
420	5/30/2018	12	4 emails between team, Wilcox v. Swapp - Defendants' Responses to Interrogatories 13-17.
421	5/30/2018	3	Marcus Sweetser to team, Draft Motion to Quash
422	5/30/2018	6	2 emails between team, Thomas Kirchofer to team, WSP response to 3rd party subpoena- Wilcox
423	5/30/2018	6	2 emails between team, Ming Siegel to team, Swapp: Pls. Production - Wilcox 37-38
424	5/30/2018	21	7 emails between team, Subpoena for eagle List Serve E-Mail regarding, Attachment
425	5/30/2018	3	Thomas Kirchofer to team, Notion
426	5/30/2018	3	Marcus Sweetser to team, Swapp Subpoena for eagle list serve emails, Attachment
427	5/30/2018	3	Thomas Jarrard to team, Wilcox v. Swapp Law PLLC…, Attachment
428	5/30/2018	3	Janet Wiley to team, Wilcox et al. v. Swapp Law et al, Attachment
429	5/31/2018	3	Joseph Barton to team, Swapp: Call settlement
430	5/31/2018	6	2 emails between team, Wilcox et al. v. Swapp law et al., Attachment
431	5/31/2018	15	5 emails between team, Swapp - WSP's production, Attachment
432	5/31/2018	6	2 emails between team, Wilcox v. Swapp - Motion to Compel, Attachment
433	5/31/2018	3	Darrell Cochran to team, Subpoena for eagle list server
434	5/31/2018	6	2 emails between team, Swapp: Pls. Production - Wilcox 37-38
435	5/31/2018	3	Marcus Sweetser to team, Motion updated Draft, Attachment
436	5/31/2018	12	4 emails between team, Swapp Subpoena for Eagle List serve Emails, Attachment
437	6/1/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp
438	6/1/2018	3	Marcus Sweetser to team, Subpoena for Eagle List Serve E-Mails…, Attachment
439	6/1/2018	3	Thomas Jarrard to team, 85 % Draft Motion to Quash, Attachment
440	6/1/2018	3	Joseph Barton to team, Question re Withholdings
441	6/3/2018	6	2 emails between team, Wilcox v Swapp Law PLLC, Attachment
442	6/4/2018	3	Thomas Kirchofer to team, 85% Draft Motion to Quash, Attachment
443	6/4/2018	3	Thomas Kirchofer to team, 85% Draft motion to quash, Attachment
444	6/4/2018	3	Thomas Jarrard to team, Date of no availability for June and July, Attachment
445	6/4/2018	3	Thomas Kirchofer to team, Swapp -Liquidated Damages are not a penalty
446	6/4/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp Law PLLC et al…, Attachment
447	6/4/2018	9	3 emails between team, Wilcox Depos, Attachment
448	6/4/2018	3	Kizzy Johnson to team, Nonparty Resp. to SDT from Swapp, Attachment
449	6/4/2018	3	Ming Siegel to team, Swapp: Notice of Subpoena to Spokane Police…, Attachment
450	6/4/2018	3	Thomas Kirchofer to team, Swapp - Batiste - Document Question, Attachment
451	6/4/2018	120	draft 3rd party objections to subpoena
452	6/4/2018	120	draft and review 3rd party objections 90% for mike love
453	6/5/2018	9	3 emails between team Objections and Mike Love
454	6/5/2018	9	3 emails between team, Nonparty Resp. to SDT from Swapp, Attachment
455	6/5/2018	3	Barbara Duffy to team, WSP 30b6
456	6/6/2018	3	Thomas Kirchofer to team, Wilcox v. Batiste…, Attachment
457	6/6/2018	12	4 emails between team, WSP response to 3rd party subpoena- Wilcox
458	6/6/2018	3	Joseph Barton to team, Wilcox v. Swapp Depositions

459	6/6/2018	3	ECF document review, 45, First MOTION to Compel Interrogatory Answers by Jade Wilcox.
460	6/6/2018	12	4 emails between team, Swapp - Motion to Compel, Attachment
461	6/6/2018	3	Joseph Barton to team, Swapp: Sweetser Resp. to subpoena, Attachment
462	6/7/2018	15	5 emails between team, Wilcox v. Swapp Depositions, Attachment
463	6/7/2018	3	Marcus Sweetser to team, Wilcox v. Batiste, Attachment
464	6/7/2018	3	Janet Wiley to team, Wilcox et al. v. Swapp Law et al…, Attachment
465	6/7/2018	3	Barbara Duffy to team, Wilcox et al. v. Swapp Law et al.
466	6/7/2018	3	Joseph Barton to team, Depo letter from Duffy, Attachment
467	6/7/2018	3	Joseph Barton to team, Wilcox v. Batiste, No. 2:17-cv-00122-RMP
468	6/8/2018	15	5 emails between team, Wilcox v. Swapp Depositions, Attachment
469	6/8/2018	3	Thomas Jarrard to team, Mike here are the objections for you, Attachment
470	6/8/2018	3	Elizabeth Calkins to team, Wilcox v. Swapp
471	6/8/2018	9	3 emails between team, Wilcox v. Swapp et al, Attachment
472	6/8/2018	3	Jessica Christensen to team, Deposition Notice, Attachment
473	6/11/2018	3	Ming Siegel to team, Swapp: Pls. Notice of deposition to wash state patrol, Attachment
474	6/11/2018	9	3 emails between team, Wilcox v. Swapp Depositions, Attachment
475	6/11/2018	3	Janet Wiley to team, Wilcox et al. v. Swapp Law et al., Attachment
476	6/11/2018	6	2 emails between team, Wilcox v. Swapp, et al. - Production of Collision Reports - Swapp_002214-37353
477	6/12/2018	12	4 emails b between team, Wilcox v. Batiste, No. 2:17-cv-00122-RMP
478	6/12/2018	9	3 emails between team, Wilcox v. Swapp, et al. - Production of Collision Reports - Swapp_002214-37353, Attachment
479	6/12/2018	3	Joseph Barton to team, Wilcox v. Swapp et al. Agreement…, Attachment
480	6/13/2018	3	Ming Siegel to team, Swapp: Notice and Subpoena to the CJTC, Attachment
481	6/13/2018	12	4 emails between team, Wilcox v. Swapp et al. Location of Depositions, Attachment
482	6/13/2018	3	Joseph Barton to team, Swapp: Deposition to Wash State Patrol
483	6/13/2018	3	Janet Wiley to team, Wilcox v. Swapp Law et al, Attachment
484	6/14/2018	12	4 emails between team, Wilcox et al deposition of Wilcox, Attachment
485	6/14/2018	9	3 emails between team, Draft of letter of Engagement James R. Sweetser, Attachment
486	6/14/2018	6	2 emails between team, Wilcox v. Swapp et al Deposition of Wilcox, Attachment
487	6/15/2018	3	Joseph Barton to team, Wilcox v. Swapp - 30(b)(6) Deposition Subpoena -- Topics 13 and 14
488	6/15/2018	3	Ryan McBride to team, Swapp: Notices Subpoenas, Attachment
489	6/15/2018	3	Ming Siegel to team, Swapp: Letter from Thomas Kirchofer dated…, Attachment
490	6/15/2018	3	Joseph Barton to team, Wilcox et al. v. Swapp Depositions
491	6/15/2018	3	Shelly Williams to team, Wilcox v. Swapp - Deposition Subpoena
492	6/15/2018	3	Ming Siegel to team,Pls Production WSP 1-520 and Plaintiff 7161-9097
493	6/15/2018	3	James Sweetser to team, Swapp, Attachment
494	6/15/2018	3	Ming Siegel to team, Swapp: Pls. Production WSP 1-520…
495	6/15/2018	3	William Shelly to team, Swapp: Pls. notice of deposition to wash State Patrol
496	6/15/2018	3	William Shelly to team, Swapp: PLS Notice of Deposition to Wash State Patrol
497	6/15/2018	6	2 email between team, Wilcox v. Swapp - 30b6 Deposition Subpoena
498	6/15/2018	3	Kizzy Johnson to team, Wilcox v. WSP, Attachment
499	6/15/2018	3	Kizzy Johnson to team, Draft of Letter of Engagement James r. Sweetser, Attachment
500	6/15/2018	3	Joseph Barton to team, Wilcox v. Swapp - 30b6…
501	6/15/2018	3	Thomas Kirchofer to team, Swapp: Pls. Production WSP…
502	6/15/2018	6	2 emails between team, Wilcox v WSP Pls. Draft Responses to WSP Rogs, Attachment
503	6/16/2018	3	Marcus Sweetser to team, Florida Driver's License…
504	6/17/2018	12	4 emails between team, Wilcox v. Swapp - depo exhibits, Attachment
505	6/17/2018	6	2 emails between team, Swapp: Notices and Subpoenas…
506	6/18/2018	6	2 emails between team, Swapp: Pls. Production - Plaintiff009098-11250
507	6/19/2018	3	Joseph Barton to team, Wilcox v. WSP Pls. Draft…, Attachment
508	6/19/2018	3	2 emails between team, Swapp Subpoena for Eagle List serve Emails, Attachment
509	6/19/2018	3	Barbara Duffy to team, Swapp: Letter from Thomas Kirchofer…

510	6/19/2018	9	3 emails between team, Objects to lane Powell, Attachment
511	6/20/2018	9	3 emails between team, Nonparty Objection to Production of Documents, Attachment
512	6/20/2018	3	Joseph Barton to team, Wilcox v. WSP final responses to 1st Discovery, Attachment
513	6/20/2018	3	ECF document review, 46, RESPONSE to Motion re 45 First MOTION to Compel
514	6/20/2018	3	ECF document review, 47, DECLARATION by Barbara J. Duffy in Opposition re 45 First MOTION to Compel
515	6/20/2018	6	2 emails between team, For you're reading pleasure, Attachment
516	6/21/2018	120	Wilcox depo prep Client
517	6/22/2018	3	Joseph Barton to team, Wilcox v. Swapp Depositions
518	6/22/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Morehouse Follow Up., Attachment
519	6/22/2018	3	Thomas Kirchofer to team, What was the last depo exhibit number
520	6/22/2018	3	Joseph Barton to team, Swapp: Wilcox Depo
521	6/22/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - License/registration
522	6/22/2018	9	3 emails between team, Supplement response to rig 3 and 7, Attachment
523	6/22/2018	3	Nicole seems to team, Jade Wilcox v. James Craig Swapp..., Attachment
524	6/22/2018	3	Thomas Jarrard to team, Swapp: Wilcox Depo, Attachment
525	6/22/2018	6	2 emails between team, Depo Follow up, Attachment
526	6/22/2018	600	Defend Wilcox deposition and email follow-ups
527	6/24/2018	3	Joseph Barton to team, Wilcox v. Swapp: Letter re Rule…
528	6/24/2018	3	Joseph Barton to team, Swapp: Letter from Thomas Kirchofer dates…
529	6/24/2018	6	2 emails between team, Wilcox v Swap: Wilcox depo follow up
530	6/24/2018	3	Thomas Jarrard to team, Wilcox Depo Follow up
531	6/25/2018	3	Ryan McBride to team, Swapp v. Wilcox: Subpoena to Sweetser, Attachment
532	6/25/2018	3	Thomas Kirchofer to team, Subpoena - Wilcox v. James Craig Swapp, et al, Attachment
533	6/26/2018	3	Joseph Barton to team, Swapp: Spokane Place Production, Attachment
534	6/26/2018	12	4 emails between team, Wilcox v. Swapp - DOL subpoena, Attachment
535	6/26/2018	3	Thomas Kirchofer to team, Wilcox v Swapp - -Subpoena to the DOL, Attachment
536	6/26/2018	15	5 emails between team, Wilcox v. Swapp - Filing, Attachment
537	6/26/2018	3	Janet Wiley to team, Wilcox et al. v. Swapp Law et al. Letter to Counsel, Attachment
538	6/26/2018	6	2 emails between team, Wilcox v. Swapp, Et al..
539	6/27/2018	6	2 emails between team, Swapp: Ds Letter re Discovery
540	6/27/2018	6	2 emails between team, My Log in info ECF for filing, Attachment
541	6/27/2018	3	Thomas Kirchofer to team, My log in info ECF for filing, Attachment
542	6/27/2018	3	Marcus Sweetser to team, Swapp : Ds Letter re Discovery..
543	6/27/2018	3	ECF document review, 48, REPLY MEMORANDUM re 45 First MOTION to Compel
544	6/27/2018	3	Ming Siegel to team, My Log in info ECF for filing, Attachment
545	6/27/2018	3	Joseph Barton to team, Swapp: Ds Letter re Discovery
546	6/28/2018	3	Ming Siegel to team, Swapp: Letter RE Interrogatory Response, Attachment
547	6/28/2018	3	ECF document review, 49, NOTICE of Appearance of Counsel
548	6/28/2018	3	ECF document review, 50, NOTICE OF WITHDRAWAL OF COUNSEL
549	6/28/2018	3	Thomas Jarrard to team, Edit, Attachment
550	6/28/2018	3	William Shelly Swapp Pls. Notice of Deposition..., Attachment
551	6/28/2018	3	Ming Siegel to team, Swapp: Productions Plaintiff…
552	6/29/2018	3	Ming Siegel to team, Swapp: WSP Depo transcript
553	6/29/2018	3	Ming Siegel to team, Ming Siegel has shared a folder with you
554	6/29/2018	3	Nicole Symes to team, Jade Wilcox v. James Craig Swapp..,. Attachment
555	6/29/2018	3	Joseph Barton to team, Swapp: Wilcox Deposition
556	6/29/2018	3	Thomas Kirchofer to team, Swapp: Pls. Notice of Deposition to Wash State Patrol
557	6/29/2018	3	Thomas Jarrard to team, Protective order to court reporter
558	6/29/2018	3	Elizabeth Calkins to team, Swapp: WSP Depo Transcript, Attachment
559	6/29/2018	3	Joseph Barton to team, Swapp: Wilcox Depo
560	7/1/2018	9	3 emails between team, Swapp: Pls. notice of deposition to wash state patrol, Attachment

561	7/1/2018	3	Joseph Barton to team, Swapp: Wilcox Depo
562	7/2/2018	3	Janet Wiley to team, Wilcox v. Swapp et al..., Attachment
563	7/2/2018	12	4 emails between team, Swapp Ds Letter to Counsel 7-2-18, Attachment
564	7/3/2018	3	Ming Siegel to team, Swapp: Letter RE Unilateral Redaction of Documents, Attachment
565	7/3/2018	3	Ming Siegel to team, Swapp: Letter RE Topics..., Attachment
566	7/3/2018	27	9 emails between team, Swapp Motion to Compel Interrogatories..., Attachment
567	7/3/2018	3	ECF document review, 51, Second MOTION to Compel by Jade Wilcox
568	7/3/2018	3	ECF document review, 52, MOTION for Leave to File Excess Pages by Jade Wilcox
569	7/3/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp Law et al...
570	7/3/2018	3	Thomas Jarrard to team, Swapp Motion to Compel Interrogatories Nos 2-4, Attachment
571	7/3/2018	18	6 emails between team, Swapp v. Wilcox: Subpoena to Sweetser
572	7/5/2018	3	Barbara Duffy to team, Swapp: Letter RE Unilateral Redaction of Documents
573	7/5/2018	6	2 emails between team, Wilcox v. Swapp: Availability for Deposition
574	7/5/2018	3	Shelly Williams to team, Wilcox v. Swapp - Sector source code
575	7/6/2018	3	ECF document review, 53, TEXT ORDER (no PDF will issue) granting, for good cause shown, Plaintiff's Motion for Leave to File Excess Pages
576	7/6/2018	6	2 emails between team, Wilcox et al. v. Swapp..., Attachment
577	7/6/2018	3	Thomas Kirchofer to team, I'm on the other line... call you in a bit
578	7/9/2018	6	2 emails between team, Spokane Police 30-b-6
579	7/9/2018	6	2 emails between team, Wilcox v. Swapp - depos
580	7/10/2018	12	4 emails between team, Conference room
581	7/10/2018	15	5 emails between team, Crumb Court Reporting Shared..., Attachment
582	7/10/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - SPD Deposition, Attachment
583	7/10/2018	3	Thomas Kirchofer to team, Spokane Police Depo, Attachment
584	7/10/2018	6	2 emails between team, Wilcox v. Batiste, No..., Attachment
585	7/11/2018	3	Amend a Lund to team, Wilcox et al. v. Swapp Law et al..., Attachment
586	7/11/2018	3	Ming Siegel to team, Swapp: Deposition Notice and Subpoena to CJC..., Attachment
587	7/11/2018	6	2 emails between team, Wilcox et al. v Swapp Law...
588	7/11/2018	3	Joseph Barton to team, Swapp: Letter re Unilateral Redaction of Documents
589	7/11/2018	3	Amanda Lund to team, Wilcox et al. V. Swapp Law et al, Attachment
590	7/12/2018	15	5 emails between team, Wilcox et al v. Swapp Law...
591	7/12/2018	3	Joseph Barton to team, Wilcox et al. Swapp Defendants
592	7/12/2018	3	Michael Love to team, Swapp v. Wilcox Subpoena to Sweetser
593	7/12/2018	3	Nicole Symes to team, Jade Wilcox v. James Craig Swapp, Attachment
594	7/12/2018	6	2 emails between team, Wilcox Swapp Batiste - Document issue, Attachment
595	7/12/2018	3	Barbara Duffy to team, Wilcox et al. v. Swapp: Defendants...
596	7/12/2018	6	2 emails between team, Wilcox et al. v. Swapp et al, Attachment
597	7/12/2018	3	Thomas Kirchofer to team, Swapp Subpoena, Attachment
598	7/12/2018	3	Thomas Kirchofer to team, Benefits question
599	7/12/2018	3	Thomas Kirchofer to team, Wilcox Swapp Batiste - document issue
600	7/12/2018	3	Mary Muramatsu to team, Swapp Subpoena, Attachment
601	7/12/2018	6	2 emails between team, Benefits Questions
602	7/12/2018	3	Thomas Kirchofer to team, SPD depo items
603	7/13/2018	6	2 emails between team, Swapp Batiste Depos of Wilcox Tomorrow, Attachment
604	7/13/2018	9	3 emails between team, Swapp Subpoena, Attachment
605	7/13/2018	3	Marcus Sweetser to team, Swapp Batiste depo of Wilcox tomorrow
606	7/13/2018	3	Diana Handley to team, Wilcox Swapp Batiste - Document issue, Attachment
607	7/13/2018	3	Ming Siegel to team, Swapp: Notice and Subpoena of 30b6..., Attachment
608	7/13/2018	3	Joseph Barton to team, Wilcox et al v. Swapp Defendants Unilateral Redaction...
609	7/13/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Pages, Attachment
610	7/13/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Pages, Attachment
611	7/13/2018	3	Jessica Christensen to team, Wilcox c. Swapp, Attachment

612	7/13/2018	3	Joseph Barton to team, Wilcox et al. v. Swapp Law et al.
613	7/13/2018	3	Joseph Barton to team, Wilcox et al. v. Swapp Law …
614	7/13/2018	360	Prep and defend Wilcox WSP deposition
615	7/14/2018	3	Joseph Barton to team, Swapp: Wilcox Depo in Batiste
616	7/14/2018	3	Joseph Barton to team, Swapp: Wilcox depo in Batiste
617	7/14/2018	3	Joseph Barton to team, Wilcox v. Swapp: Your July 12 Letter re Depositions
618	7/14/2018	3	Joseph Barton to team, Swapp: Depo and possible Declaration
619	7/14/2018	3	Jade Wilcox to team, Depo today
620	7/14/2018	3	Joseph Barton to team, Wilcox Swapp Batiste - Document issue
621	7/15/2018	6	2 emails between team, Wilcox v. Swapp - Pages
622	7/16/2018	3	Michael Love to team, CR 37 Conference
623	7/16/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Oral Argument on motion to compel
624	7/16/2018	6	2 emails between team, Wilcox v. Swapp Law: Defendant's production of unredacted…
625	7/17/2018	6	2 emails between team, Wilcox et al. v. Swapp Defendants…
626	7/17/2018	6	2 emails between team, Wilcox v. Swapp - Oral Argument
627	7/17/2018	3	Thomas Jarrard to team, 31 depo Notice, Attachment
628	7/17/2018	3	Janet Wiley to team, Wilcox et al. v. Swapp Law -- Duffy 7/17/18.., Attachment
629	7/17/2018	3	ECF document review, 54, MEMORANDUM in Opposition re 51 Second MOTION to Compel
630	7/17/2018	3	ECF document review, 55, DECLARATION by Barbara J. Duffy in Opposition re 51 Second MOTION to Compel
631	7/18/2018	12	4 emails between team, Wilcox et al v. Swapp Law…
632	7/19/2018	3	Ming Siegel to team, Swapp: WSP - Candee and Johnson Transcripts, Attachment
633	7/19/2018	6	2 emails between team, Wilcox v. Swapp - Spokane Police depo, Attachment
634	7/19/2018	6	2 emails between team, Wilcox et al. v. Swapp Law -- 2nd Supplemental Responses…
635	7/19/2018	3	Crumb Reporting to team, Jade Wilcox - E- Transcript File Delivery, Attachment
636	7/20/2018	3	Janet Wiley to team, Wilcox v. Swapp Law et al. -- Letter Counsel, attachment
637	7/20/2018	12	4 emails between team, Wilcox et al v. Swapp Law -- 2ndSupplemental Response to…
638	7/20/2018	9	3 emails between team, Wilcox v. Swapp - Motion to extend
639	7/20/2018	3	Ming Siegel to team, Ming Siegel has shared a folder with you
640	7/20/2018	3	Ming Siegel to team, Swapp: WSP - Candee and Johnson Transcripts, Attachment
641	7/20/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Assented to motion, Attachment
642	7/20/2018	6	2 emails between team, Willox v. Swapp - Motion to extend
643	7/22/2018	15	5 emails between team, Wilcox et al. v. Swapp Law, Attachment
644	7/23/2018	3	ECF document review, 56, Stipulated MOTION for Extension of Time to File Response/Reply by All Plaintiffs
645	7/23/2018	6	2 emails between team, Swapp: Plaintiff's Productions
646	7/24/2018	3	Joseph Barton to team, Wilcox et al. v. Swapp: Defendants
647	7/25/2018	3	Ming Siegel to team, Swapp: WSP - Candee and Johnson Transcripts
648	7/25/2018	6	2 emails between team, Ming Siegel has shared a folder with you
649	7/25/2018	6	2 emails between team, Swapp: plaintiff's Production DOL000001-109, Attachment
650	7/25/2018	6	2 emails between team, CR 37 Conference with Enemy
651	7/25/2018	3	Thomas Jarrard tot team, Swapp DPPA, Attachment
652	7/25/2018	15	5 emails between team, Swapp v. Wilcox
653	7/25/2018	3	Thomas Jarrard to team, DPPA, Attachment
654	7/25/2018	3	Michael Love to team, Swapp v. Wilcox Subpoena to Sweetser
655	7/25/2018	320	spd depo prep and exhibits
656	7/26/2018	6	2 emails between team, Swapp v Wilcox
657	7/26/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Nao
658	7/26/2018	3	Sam Wright to team, Law Review 18070 -- Third Party, Attachment
659	7/26/2018	3	Thomas Jarrard to team, Witness Stuff, Attachment
660	7/26/2018	3	Thomas Jarrard to team, Quash for Swapp example, Attachment
661	7/26/2018	3	Michael Love to team, Swapp v. Wilcox: Sweetser Subpoena
662	7/26/2018	6	2 emails between team, Swapp v Wilcox

663	7/26/2018	3	Production to team, Wilcox v. Batiste et al.
664	7/26/2018	3	Barbara Duffy to team, Wilcox et al. v. Swapp Law, Attachment
665	7/27/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Johnson and Candee
666	7/27/2018	3	Thomas Kirchofer to team, Wilcox vs. Swapp Law
667	7/27/2018	3	Ming Siegel to team, Ming Siegel has shared a folder with you
668	7/27/2018	3	Ming Siegel tot team,, Wilcox v. Swapp - Johnson and Candee
669	7/27/2018	3	Production to team, Wilcox v. Batiste et al., Attachment
670	7/27/2018	3	Production to team, Jade Wilcox read and sign paperwork, Attachment
671	7/27/2018	3	Ming Siegel to team, Swapp: Candee Exhibits Part 2, Attachment
672	7/27/2018	3	Ming Siegel to team, Swapp: Johnson Exhibits, Attachment
673	7/27/2018	3	Ming Siegel to team, Swapp: Candee Exhibits, Attachment
674	7/27/2018	3	Michael Love to team, Subpoena to Sweetser Law Firm
675	7/28/2018	6	2 emails between team, Swapp Catch depo
676	7/30/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Motion to compel
677	7/30/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Tuesday
678	7/30/2018	9	3 emails between team, Swapp: CJTC Depo, Attachment
679	7/30/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp, Attachment
680	7/30/2018	3	Joseph Barton to team, Swapp: Notice and Subpoena..., Attachment
681	7/30/2018	180	Call with Joe Barton
682	7/31/2018	3	Swapp: Spokane Depo
683	7/31/2018	3	Thomas Jarrard to team, Print Todays depo, Attachment
684	7/31/2018	3	Elizabeth Calkins to team, Scan Didn't come though
685	7/31/2018	3	Thomas Jarrard to team, please print number 2, attachment
686	7/31/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - reply, Attachment
687	7/31/2018	3	Thomas Jarrard to team, Liz Please file this today in Wilcox v. Swapp..., Attachment
688	7/31/2018	6	2 emails between team, What was the last exhibit number at the last depo, Attachment
689	7/31/2018	3	ECF document review, 57, REPLY MEMORANDUM re 51 Second MOTION to Compel filed by Jade Wilcox
690	7/31/2018	6	2 emails between team, Wilcox v. Swapp, Attachment
691	7/31/2018	3	Joseph Barton to team, Swapp Rough Draft -DOL Depo..., Attachment
692	7/31/2018	3	Thomas Jarrard to team, Meet and Confer
693	7/31/2018	300	Depo Preparation
694	7/31/2018	240	Conduct Wilcox spd prep and depo
695	8/1/2018	3	Joseph Barton to team, Voice Message from on 07/31/2018
696	8/1/2018	6	2 emails between team, Swapp - Amended Complaint, Attachment
697	8/1/2018	3	Thomas Kirchofer to team, Wilcox - Jade's Batiste depo transcript
698	8/1/2018	3	ECF document review, 58, CERTIFICATE OF SERVICE as to 57 Reply Memorandum filed by Jade Wilcox
699	8/1/2018	15	5 emails between team, Swapp - Amended Complaint, Attachment
700	8/1/2018	3	Mary Muramatsu to team, Meet and Confer, Attachment
701	8/1/2018	6	2 emails between team, Ming Siegel to team, Swapp: Plaintiff's Productions - Plaintiff
702	8/1/2018	6	2 emails between team, Wilcox v Swapp (privileged and confidential) attachment
703	8/1/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp, Attachment
704	8/1/2018	3	Thomas Jarrard to team, Meet and Confer, Attachment
705	8/1/2018	3	Ming Siegel to team, Swapp: Plaintiff's production - sector source code
706	8/1/2018	12	4 emails between team, Meet and confer, Attachment
707	8/1/2018	45	Edit Amended Complaint
708	8/2/2018	9	3 emails between team, Wilcox v. Swapp - Proposed complaint, Attachment
709	8/2/2018	3	Marcus Sweetser to team, Amend Complaint in Wilcox v WSP, Attachment
710	8/2/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - proposed amended complaint, Attachment
711	8/3/2018	3	Joseph Barton to team, Please CC Kizzy on all the emails especially where docs..., Attachment
712	8/3/2018	3	Peter Romer-Friedman to team, Revised MOU with my edits, Attachment
713	8/3/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp

714	8/3/2018	6	2 emails between team, Wilcox signature page last deposition, Attachment
715	8/3/2018	3	Jessica Christensen to team, Jade Wilcox Declaration, Attachment
716	8/5/2018	12	4 emails between team, Missing Legal Pad, Attachment
717	8/6/2018	3	Kizzy Johnson to team, Wilcox v. Swapp
718	8/6/2018	12	4 emails between team, Wilcox v. Swapp - Proposed amended complaint, Attachment
719	8/6/2018	3	Peter Romer-Friedman to team, Revised MOU with my edits, Attachment
720	8/6/2018	3	ECF document review, 59, NOTICE of Hearing on Motion
721	8/6/2018	3	Thomas Jarrard to team, SPD transcript
722	8/6/2018	6	2 emails between team, Wilcox - Sealed docs, Attachment
723	8/6/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - draft class cert, Attachment
724	8/7/2018	6	2 emails between team, Case 2:17-cv-00275
725	8/7/2018	9	3 emails between team, Swapp: Final class cert brief, Attachment
726	8/7/2018	3	Ming Siegel to team, Swapp: Class cert exhibits and declarations
727	8/7/2018	3	Ming Siegel to team, Swapp: Motion to Amend Filings, Attachment
728	8/7/2018	6	2 emails between team, ABA Revamping attorney advertising, Attachment
729	8/7/2018	3	Barbara Duffy to team, Wilcox v. Swapp - proposed amended complaint.
730	8/7/2018	3	ECF document review, 60, First MOTION to Amend/Correct Complaint by Jade Wilcox
731	8/7/2018	3	Joseph Barton to team, Wilcox v. Swapp - proposed amended complaint
732	8/7/2018	15	5 emails between team, Swapp: Potential Class Cert Hearing, Attachment
733	8/7/2018	3	ECF document review, 61, First MOTION to Certify Class by Jade Wilcox.
734	8/7/2018	3	Barbara Duffy to team, Oral Argument on motion to certify, Attachment
735	8/7/2018	6	2 emails between team, Missing Legal pad, Attachment
736	8/7/2018	3	Joseph Barton to team, ABA Revamping Attorney Advertising Ethic Rules, Attachment
737	8/7/2018	3	ECF Document review, 62, Sealed Document by Jade Wilcox.
738	8/8/2018	6	2 emails between team, Swapp
739	8/8/2018	3	Joseph Barton to team, Wilcox v. Swapp - Amended Complaint
740	8/8/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp - Ex. 15/16
741	8/8/2018	3	ECF document review, 63, Praecipe filed by Jade Wilcox: Re 62 Sealed Document. Description: Mislabled Exhibit on Docket Entry 62-4.
742	8/8/2018	6	2 emails between team, Wilcox v. Swapp Amended Complaint, Attachment
743	8/8/2018	6	2 emails between team, Swapp, Attachment
744	8/9/2018	3	Mary Muramatsu to team, Rule 37 Call, Attachment
745	8/12/2018	6	2 emails between team, Rule 37 call reschedule
746	8/13/2018	9	3 emails between team, Wilcox v. Swapp - Amended Complaint
747	8/14/2018	6	2 emails between team, Wilcox v. Swapp - CJTC
748	8/14/2018	6	2 emails between team, File(s) for: Jade Wilcox, Et Al. v Swapp Law, LLC, Et Al.; Witness(es): Brad Moon - 30(b)(6), Attachment
749	8/14/2018	3	CS Cisatlantic to team, File for: Jade Wilcox
750	8/14/2018	3	Barbara Duffy to team, Wilcox v. Swapp - Amended Complaint, Attachment
751	8/15/2018	3	Thomas Jarrard to team, Ms. Duffy's S/, Attachment
752	8/15/2018	15	5 emails between team, Wilcox v. Swapp - Stipulation re: Amended Complaint. , Attachment
753	8/16/2018	3	Barbara Duffy to team, Ms. Duffy's S/, Attachment
754	8/16/2018	3	ECF document review, 64, Stipulated MOTION Plaintiff is entitled to file the Proposed Amended Complaint re 60 First MOTION
755	8/16/2018	3	Thomas Jarrard to team, Case 2:17-cv-00275-RMP Wilcox v. Swapp et al , Attachment
756	8/17/2018	3	ECF document review, 65, ORDER GRANTING IN PART AND DENYING IN PART
757	8/17/2018	3	Thomas Jarrard to team, Wilcox, Attachment
758	8/17/2018	3	Thomas Jarrard to team, Hearing 30th
759	8/17/2018	3	Thomas Jarrard to team, Aug 30 Hearing Loadstar??, Attachment
760	8/18/2018	3	Thomas Jarrard to team, Wilcox v. Batiste Cert Motion
761	8/20/2018	3	ECF document review, 66, NOTICE OF FILING OF OFFICIAL TRANSCRIPT of Motion Hearing
762	8/20/2018	3	ECF document review, 67, TEXT-ONLY ORDER (no PDF will issue) granting, for good cause shown
763	8/20/2018	3	ECF document review, 68, TEXT-ONLY ORDER (no PDF will issue) finding as moot ECF No. 60 Motion to Amend/Correct
764	8/20/2018	3	James Morrison to team, Hall v. L3 Status Report, attachment

765	8/20/2018	3	Ming Siegel to team, Swapp: Amended Complaint, Attachment
766	8/20/2018	3	ECF document review, 69, First AMENDED COMPLAINT against All Defendants
767	8/20/2018	3	Marcus Sweetser to team, Wilcox v. Batiste Cert Motion
768	8/20/2018	3	Kizzy Johnson to team, Wilcox v. Swapp-Motion for Certification
769	8/21/2018	6	2 emails between team, Swapp: Lodestar for motion to compel..., Attachment
770	8/21/2018	3	ECF document review, 70, ORDER finding as moot ECF No. 56 , Plaintiff's Motion for Extension of Time to File Reply.
771	8/23/2018	3	Thomas Kirchofer to team, Wilcox v. Swapp, Attachment
772	8/23/2018	15	5 emails between team, Wilcox, et al. V. Swapp
773	8/23/2018	3	Joseph Barton to team, Swapp Memo re Deposition Errata, Attachment
774	8/23/2018	12	4 emails between team, Batiste et al motion of summary judgment
775	8/24/2018	6	2 emails between team, Swapp: Lodestar for Motion to compel, Attachment
776	8/24/2018	3	ECF document review, 71, NOTICE OF WITHDRAWAL OF COUNSEL
777	8/28/2018	3	ECF document review, 72, Praecipe filed by Jade Wilcox: Re 61 First MOTION to Certify Class
778	8/28/2018	3	ECF document review, 73, NOTICE of Hearing on Motion - By Court
779	8/30/2018	48	16 emails between team, Wilcox v. Swapp 17-cv-275, Attachment
780	8/30/2018	3	Thomas Jarrard to team, Motion on Sanctions, Attachment
781	8/30/2018	60	prep and hearing re compel and Motion and for Sanctions and Costs.
782	8/30/2018	3	ECF document review, 74, Minute Entry for TELEPHONIC proceedings held before Judge Rosanna Malouf Peterson
783	8/31/2018	3	Matt Smith to team, Wilcox et al. v. Swapp...
784	8/31/2018	3	Joseph Barton to team, Swapp Motion on sanctions, Attachment
785	9/6/2018	3	Matt Smith to team, Wilcox et al. v. Swapp...
786	9/10/2018	3	Thomas Jarrard to team, Call court about other dates
787	9/11/2018	3	Thomas Jarrard to team, Swapp proposed 12b motion hearing date and cert date, attachment
788	9/11/2018	18	6 emails between team, Oral Argument Dates, Attachment
789	9/11/2018	3	ECF document review, 75, MOTION to Compel Compliance with Subpoena Served on James Sweetser and Sweetser Law Office
790	9/11/2018	3	James Sweetser to team, Case 2:17...
791	9/11/2018	3	Thomas Jarrard to team, Motion to compel, Attachment
792	9/11/2018	12	4 emails between team, Case 2:17-cv-00275
793	9/11/2018	15	5 emails between team, Oral Argument Dates..., Attachment
794	9/11/2018	3	ECF Document review, 76, DECLARATION by Ryan P. McBride in Support
795	9/11/2018	3	ECF Document review, 77, MOTION for Leave to File Excess Pages
796	9/12/2018	18	6 emails between team, Case 2:17-cv-00275
797	9/12/2018	3	Michael Love to team, Case 2:17-cv-00275..
798	9/12/2018	3	Thomas Jarrard to team, Protective Order
799	9/12/2018	3	ECF Document review, 78, TEXT-ONLY ORDER (no PDF will issue) granting, for good cause shown
800	9/12/2018	3	ECF Document review, 79, ORDER DENYING AS MOOT 51 Plaintiff's Second Motion to Compel Interrogatory Answers
801	9/12/2018	3	ECF Document review, 80, MOTION to Dismiss for Failure to State a Claim
802	9/14/2018	15	5 emails between team, case 2:17-cv-00275...
803	9/15/2018	3	Joseph Barton to team, Swapp: Motion to Compel Sweetser
804	9/15/2018	45	prep Casey declaration
805	9/15/2018	45	prep Albrecht declaration
806	9/18/2018	12	4 emails between team, Wilcox v. Swapp Law et al...
807	9/20/2018	3	Joseph Barton to team, Swapp: Diver from Ds...
808	9/20/2018	3	Thomas Jarrard to team, no subject, Attachment
809	9/20/2018	3	Thomas Jarrard to team, Pichler v. United...
810	9/20/2018	3	Thomas Jarrard to team, Swapp: Discovery from Ds..., Attachment
811	9/20/2018	3	Joseph Barton to team, Swapp: Discovery from Ds Financial info for punitive, Attachment
812	9/20/2018	9	3 emails between team, Swapp: Stipulation...
813	9/20/2018	3	James Sweetser to team, Motion to Compel filed defendant
814	9/20/2018	3	Michael Love to team, Brief
815	9/20/2018	45	timmorman declaration review and prepare

816	9/21/2018	3	Joseph Barton to team, Swap: Discovery from Ds, Attachment
817	9/21/2018	12	4 emails between team,. Case 2:17..., Attachment
818	9/21/2018	3	Thomas Jarrard to team, WSAJ Draft Decl and Copy of the subpoena, Attachment
819	9/21/2018	36	12 emails between team, WSAJ list serve under Subpoena Attack, Attachment
820	9/21/2018	6	2 emails between team, Swapp: Discovery from Ds..., Attachment
821	9/21/2018	15	5 emails between team, WSAJ List Serve Subpoena to Sweetser, Attachment
822	9/21/2018	18	6 emails between team, Confidentiality Agreement from WSAJ, Attachment
823	9/21/2018	9	3 emails between team, WSAJ draft decl and copy of the subpoena, Attachment
824	9/21/2018	21	7 emails between team, WSAJ list serve...
825	9/21/2018	6	2 emails between team, List serve
826	9/21/2018	45	Groseclose declaration review and prepare
827	9/22/2018	3	John Groseclose to team, Declaration
828	9/22/2018	9	3 emails between team, WSAJ List Serve Subpoena TO Sweetser, Attachment
829	9/22/2018	45	review and edit Sweetser declaration
830	9/23/2018	6	2 emails between team, Second Draft of Brief and Declaration..., Attachment
831	9/23/2018	3	Michael Love to team, Second Draft of Sweetser Declaration Second Edits, Attachment
832	9/23/2018	3	Joseph Barton to team, Swapp: Potential Swap Employee Witness, Attachment
833	9/23/2018	6	2 emails between team, Swapp: Swapp Law Employees, Attachment
834	9/23/2018	3	Joseph Barton to team, Swapp: Swapp Law Employees
835	9/23/2018	3	Joseph Barton to team, Swapp: Discovery from Ds re Financial info for Punitive, Attachment
836	9/23/2018	6	2 emails between team, Decl re Swapp subpoena, Attachment
837	9/24/2018	3	James Sweetser to team, Second Draft of Sweetser Declaration Second Edits, Attachment
838	9/24/2018	12	4 emails between team, WSAJ List serve subpoena to Sweetser, Attachment
839	9/24/2018	6	2 emails between team, Second Draft of Brief and Declaration..., Attachment
840	9/24/2018	3	Michael Love to team, WSAJ List serve subpoena to Sweetser
841	9/24/2018	3	Melanie Evans to team, Swapp Subpoena, Attachment
842	9/24/2018	6	2 emails between team, Swapp Subpoena Decl from Matt Soberest Final, Attachment
843	9/24/2018	6	2 emails between team, List Server Under Attack, Attachment
844	9/24/2018	3	Michael Love to team, Final Pleadings, Attachment
845	9/24/2018	3	Janet Wiley to team, Wilcox v. Swapp et al -- Swapp Second..., Attachment
846	9/25/2018	3	Joseph Groseclose to team, Declaration, Attachment
847	9/25/2018	3	ECF document review, 81, NOTICE of Appearance on behalf of James R. Sweetser and Sweetser Law Office by Michael Bradley Love
848	9/25/2018	3	ECF document review, 82, NOTICE of Appearance on Behalf of James R. Sweetser and Sweetser Law Office by Michael Bradley Love
849	9/25/2018	3	ECF document review, 83, MOTION for Leave to File Excess Pages on Behalf of James R. Sweetser and Sweetser Law Office by All Plaintiffs
850	9/25/2018	3	ECF document review, 84, MOTION for Protective Order on Behalf of James R. Sweetser and Sweetser Law Office and Declarations and Exhibits
851	9/25/2018	9	3 emails between team, Wilcox v. Swapp Law..., Attachment
852	9/25/2018	3	ECF document review, 85, MEMORANDUM in Opposition re 61 First MOTION to Certify Class filed by James Craig Swapp
853	9/25/2018	6	2 emails between team, Filing NOA Twice...
854	9/25/2018	3	ECF document review, 86, DECLARATION by Ryan P. McBride in Opposition re 61 First MOTION to Certify Class filed by James Craig Swapp
855	9/25/2018	3	ECF document review, 87, DECLARATION by Sgt. Zachary Dahle in Opposition re 61 First MOTION to Certify Class
856	9/25/2018	3	ECF document review, 88, DECLARATION by Sgt. Jordan Ferguson in Opposition re 61 First MOTION
857	9/25/2018	3	ECF document review, 89, DECLARATION by Tania Johnson in Opposition re 61 First MOTION to Certify Class
858	9/25/2018	3	ECF document review, 90, DECLARATION by David C. Thornburg in Opposition re 61 First MOTION
859	9/25/2018	3	ECF document review, 91, DECLARATION by Lewis Stevens in Opposition re 61 First MOTION
860	9/25/2018	3	ECF document review, 92, DECLARATION by Sgt. Scott Lasher in Opposition re 61 First MOTION
861	9/25/2018	12	4 emails between team, Filing NOA twice and Failing to Flee Response.., Attachment
862	9/25/2018	12	4 emails between team, SJ Response Draft, Attachment
863	9/25/2018	30	Marshall Casey to team, WSAJ List serve subpoena to Sweetser, Attachment, call with Casey re list serve
864	9/26/2018	3	ECF document review, 93, AFFIDAVIT by Marshall Casey in Support re 84 MOTION for Protective Order
865	9/26/2018	3	Thomas Jarrard to team, Swapp: Discovery from Ds..., Attachment
866	9/26/2018	3	Joseph Barton to team, Resp. to Mtn to dismiss in Swapp

867	9/26/2018	9	3 emails between team, SJ Response Draft Priorities, Attachment
868	9/26/2018	3	Joseph Barton to team, Swapp Stipulation re Quick Peek Documents, Attachment
869	9/26/2018	9	3 emails between team, Swapp: Discovery from Ds Financial Info..., Attachment
870	9/26/2018	3	Michael Love to team, Note for hearing Swapp Motion
871	9/26/2018	3	Michael Love to team, Wilcox v. Swapp Law et al..., Attachment
872	9/26/2018	3	Joseph Barton to team, Swapp: Discovery from Ds re Financial info for punitive, Attachment
873	9/27/2018	33	11 emails between team, So Response Draft Priorities, Attachment
874	9/27/2018	6	2 emails between team, SJ Response Draft Priorities..., Attachment
875	9/27/2018	3	Jennifer Hass to team, Wilcox v. Batiste..., Attachment
876	9/27/2018	3	Shelley Williams to team, William v. Batiste Joint Motion..., Attachment
877	9/28/2018	6	2 emails between team, Wilcox v. Swapp- 9.28.18..., Attachment
878	10/2/2018	6	2 emails between team, Swapp: Almost final second MYD Opp. Brief, Attachment
879	10/2/2018	3	ECF document review, 94, REPLY MEMORANDUM re 75 MOTION to Compel Compliance with Subpoena Served
880	10/2/2018	3	James Sweetser to team, Swapp Wants to put me on trial, Attachment
881	10/3/2018	12	4 emails between team, Swapp: Almost Final Second MTD Opp. Brief TJ suggestions, Attachment
882	10/3/2018	30	Ming Siegel to team, Swapp: Final Second MTD Opp. Brief, Attachment, review
883	10/3/2018	30	ECF document review, 95, RESPONSE to Motion re 80 MOTION to Dismiss for Failure to State a Claim Dismiss Amended Complaint filed
884	10/4/2018	9	3 emails between team, Swapp: Remaining Discovery
885	10/4/2018	3	Joseph Barton to team, Swapp Stipulation re Quick Peek Documents, Attachment
886	10/5/2018	15	5 emails between team, Swapp: Potential Swapp Employee Witness, Attachment
887	10/5/2018	3	Noah Davis to team, Budget Items Follow Up
888	10/5/2018	12	4 emails between team, Investigator screening question, Attachment
889	10/5/2018	3	Thomas Jarrard to team, TJ edits to the SJ, Attachment
890	10/15/2018	9	3 emails between team, Swapp: Former Employee Contact Info, Attachment
891	10/15/2018	18	6 emails between team, Wilcox v. Swapp: Discover Stay Pending Rulings
892	10/16/2018	12	4 emails between team, Swapp Stipulation re Quick Peek Documents
893	10/17/2018	3	ECF document review, 96, REPLY MEMORANDUM re 80 MOTION to Dismiss for Failure to State a Claim
894	10/19/2018	12	4 emails between team, Wilcox v. Swapp: Discovery Stay Pending Ruling
895	10/24/2018	24	8 emails between team, Wilcox v. Swapp: Stipulation re Redacted Documents & Stay..., Attachment
896	10/24/2018	3	Ryan McBride to team, Wilcox v. Swapp: Stipulation re Redacted..., Attachment
897	10/25/2018	3	Marcus Sweetser to team, Swapp: Former Employee Contact Info, Attachment
898	10/26/2018	3	Kizzy Johnson to team, Wilcox v. Batiste
899	10/26/2018	18	6 emails between team, Wilcox v. Swapp: Document List, Attachment
900	10/28/2018	9	3 emails between team, Swapp: Stipulated re Start of Discovery, Attachments
901	10/29/2018	3	Joseph Barton to team, Wilcox v. Swapp: Stipulated re Stay, Attachment
902	10/29/2018	3	Elizabeth Calkins to team, Scan, Attachment
903	10/29/2018	30	10 emails between team, Swapp - Motion to extend deadline, Attachment
904	10/29/2018	3	ECF document review, 97, Stipulated MOTION to Extend Deadlines by All Plaintiffs
905	10/29/2018	3	ECF document review, 98, TEXT-ONLY ORDER (no PDF will issue) granting, for good cause shown
906	10/29/2018	3	Marcus Sweetser to team, Case 2:17-cv-00275-RMP Wilcox v. Swapp et al
907	10/29/2018	3	ECF Document review, 99, NOTICE of Hearing on Motion - By Court - Text entry;no PDF document
908	10/30/2018	9	3 emails between team, Swapp - Reply re Class Cert
909	10/30/2018	6	2 emails between team, Swapp - Class Cert Reply Deadline
910	10/30/2018	3	Joseph Barton to team, Swapp - Class Cert Reply Deadline
911	10/31/2018	3	Joseph Barton to team, Swapp Class Cert Reply Brief, Attachment
912	10/31/2018	3	Colin Downs to team, Swapp - Jarrard Decl., Attachment
913	10/31/2018	3	Ming Siegel to team, Swapp: Class Cert Reply Brief, Attachment
914	10/31/2018	3	ECF document review, 100, REPLY MEMORANDUM re 61 First MOTION to Certify Class filed by All Plaintiffs
915	10/31/2018	3	James Sweetser to team, Wilcox Reply to Bastine, Attachment
916	11/7/2018	18	6 emails between team, Wilcox v. Swapp: Stipulation re Redacted, Attachment
917	11/7/2018	3	ECF Document review, 101, Joint MOTION to Stay Discovery and Modify Scheduling Order

918	11/8/2018	3	Kizzy Johnson to team, Swapp: Former Employee Contract Info
919	11/9/2018	9	3 emails between team, Swapp Deposition of Craig Swapp
920	11/13/2018	3	Shelly Williams to team, Wilcox v. Batiste, Attachment
921	11/13/2018	3	Marcus Sweetser to team, Quick Question- Arrangements on class cert
922	11/15/2018	3	ECF Document review, 102, ORDER GRANTING 101 Joint Motion to Stay Discovery. Signed by Judge Rosanna Malouf Peterson
923	11/19/2018	3	Joseph Barton to team, Swapp
924	11/20/2018	9	3 emails between team, Possible Hearing delay
925	11/20/2018	3	ECF document review, 103, NOTICE of Hearing on Motion - By Court - Text entry;no PDF document
926	11/20/2018	3	ECF document review, 104, Minute Entry for TELEPHONIC proceedings held before Judge Rosanna Malouf Peterson
927	11/21/2018	3	John Barton to team, Wilcox v. Batiste Class Cert Reply Memorandum
928	12/3/2018	3	Joseph Barton to team, New Text Message from (425) 239-7290
929	12/4/2018	51	17 emails between team, Wilcox v. Swapp 17-cv-275
930	12/4/2018	3	ECF document review, 105, NOTICE of Hearing on Motion - By Court - Text entry;no PDF document. Oral Argument Requested
931	12/6/2018	3	ECF document review, 106, ORDER Denying 75 Defendants' Motion to Compel and Denying 84 Plaintiff's Motion for Protective Order.
932	12/6/2018	3	Thomas Jarrard to team, Swapp order, Attachment
933	12/6/2018	12	4 emails between team, Swapp Order on Motion to Compel
934	12/6/2018	6	2 emails between team, Swapp
935	12/6/2018	15	5 emails between team, Swapp order, Attachment
936	12/7/2018	9	3 emails between team, Court order protecting list serve, Attachment
937	12/12/2018	3	Joseph Barton to team, New Text Message from (425) 239-7290
938	12/13/2018	3	ECF document review, 107, Minute Entry for proceedings held before Judge Rosanna Malouf Peterson
939	12/13/2018	3	Joseph Barton to team, New Text Message from (425) 239-7290
940	12/13/2018	120	Swapp Hours on case
941	12/19/2018	3	Marcus Sweetser to team, Action against accident angels, Attachment
942	12/21/2018	12	4 emails between team, Swapp Order Granting Insurer's Motion -- No Duty to Defend or Indemnify
943	12/21/2018	3	Thomas Jarrard to team, FYSA, Attachment
944	12/22/2018	3	Joseph Barton to team, Wilcox v. Batiste
945	1/6/2019	45	Call with Barbara and Call with client
946	1/7/2019	30	Call with Jayson
947	1/23/2019	3	Jim Sweetser to team, Wilcox bond
948	1/24/2019	3	ECF Document review, 108, ORDER Denying 80 Defendants' Motion to Dismiss.
949	1/25/2019	3	Thomas Jarrard to team, No Subject, Attachment
950	1/25/2019	21	9 emails between team, Case 2:17-cv-00122-RMP Wilcox v Batiste et al Order on Motion for Summary Judgment
951	1/25/2019	2	Thomas Jarrard to team, Read page 29, Attachment
952	1/25/2019	6	2 emails between team, 14 days to provide JSR, Attachment
953	1/25/2019	3	ECF Document review, 109, ORDER Granting 61 Plaintiff's Motion for Class Certification. Signed by Judge Rosanna Malouf Peterson.
954	1/26/2019	3	Darin Zabriskie to team, Attachment
955	1/28/2019	3	Colin Downes to team, Case 2:17-cv-00122-RMP Wilcox v Batiste et al Order on Motion for Summary Judgment
956	1/28/2019	3	Thomas Jarrard to team, Names and Addresses
957	1/28/2019	9	3 emails between team, Law360 Story on Wilcox v. Swapp
958	1/28/2019	3	Ming Siegel to team, Names and Addresses
959	1/28/2019	9	3 emails between team, Swapp: Former Employee Contact..., Attachment
960	1/28/2019	3	Ming Siegel to team, Swapp: Names and Addresses
961	1/29/2019	9	3 emails between team, Google Alert, Attachment
962	1/29/2019	3	Joseph Barton to team, Swapp: Name and Addresses
963	1/29/2019	3	Joseph Malley to team, Congrats on Certification of the...
964	1/29/2019	3	Ming Siegel to team, Ming Siegel shared a file
965	1/29/2019	15	5 emails between team, Names and Addresses
966	1/29/2019	3	Thomas Jarrard to team, Swapp - Class Action Notice, Attachment
967	1/29/2019	6	2 emails between team, Swapp: Spreadsheets for Class List
968	1/29/2019	3	Joseph Barton to team, Re:Swapp - Class action notice, Attachment

969	1/29/2019	6	2 emails between team, Call from Attorney Who Previously Sued Swapp , Attachment
970	1/29/2019	3	Joseph Barton to team, Swapp: Spread sheets for class list
971	1/30/2019	3	Joseph Barton to team, Swapp: Press Coverage
972	1/30/2019	3	Joseph Barton to team, Congrats on Certification
973	1/30/2019	3	Jim Sweetser to team, Call from Attorney who Previously Sued..., Attachment
974	1/30/2019	3	Jim Sweetser to team, Swapp: Press Coverage
975	1/30/2019	3	Marcus Sweetser to team, Call from Attorney, Attachment
976	1/30/2019	12	4 emails between team, Swapp: Press Coverage
977	1/30/2019	9	3 emails between team, Swapp: Call from Attorney Who Previously Sued Swapp, Attachment
978	1/30/2019	6	2 emails between team, Update of Driver's Privacy Protection Act, Class Certification and Electronic Ambulance Chasing, Attachment
979	1/30/2019	3	Barbara Duffy to team, Wilcox v Swapp Status Report
980	1/30/2019	6	2 emails between team, Swapp: Call from Attorney Who previously sued swapp, Attachment
981	1/31/2019	3	Sam Wright to team, Law Review 19020, Attachment
982	1/31/2019	9	3 emails between team, Wilcox v Swapp Status Report
983	1/31/2019	9	3 emails between team, Congrats on Certification of the Wilcox...
984	1/31/2019	3	Joseph Malley to team, Public Records Request
985	1/31/2019	3	Jim Sweetser to team, Interview of Swapp prior attorney in office, Attachment
986	1/31/2019	3	Jim Sweetser to team, Beckett Depo, Attachment
987	1/31/2019	3	Joseph Barton to team, Swapp Beckett Depo, Attachment
988	2/1/2019	3	Joseph Barton to team, Swapp: Interview of Swapp, Attachment
989	2/1/2019	6	2 emails between team, Swapp: Financial Discovery, Attachment
990	2/1/2019	3	ECF document review, 110, NOTICE OF FILING OF OFFICIAL TRANSCRIPT of Motion Hearing
991	2/1/2019	3	ECF document review, 111, NOTICE OF FILING OF OFFICIAL TRANSCRIPT of Motion Hearing.
992	2/1/2019	9	3 emails between team, Case 2:17
993	2/1/2019	3	Thomas Jarrard to team, Interesting read, Attachment
994	2/4/2019	6	2 emails between team, Wilcox v Swapp Status Report
995	2/4/2019	3	Allison Stovall to team, Wilcox v. Swapp
996	2/4/2019	3	Joseph Barton to team, Wilcox v. Swapp: Transcript
997	2/4/2019	3	Allison Stovall to team, Wilcox v. Swapp
998	2/4/2019	3	Colin Downes to team, Swapp - Joint Status Report, Attachment
999	2/4/2019	15	5 emails between team, Swapp - Joint Status Report, Attachment
1000	2/5/2019	3	Joseph Barton to team, Wilcox v Swapp Call re Status..., Attachment
1001	2/5/2019	12	4 emails between team, Swapp: Former Employee Contact...
1002	2/5/2019	6	2 emails between team, Wilcox v. Swapp
1003	2/5/2019	9	3 emails between team, Swapp: Former Employee Contact Info
1004	2/5/2019	3	Joseph Barton to team, Swapp Rule 23, Attachment
1005	2/5/2019	3	Joseph Barton to team, Wilcox v Swapp re: Status
1006	2/5/2019	3	Thomas Jarrard to team, Court Sponsored Settlement, Attachment
1007	2/5/2019	3	Thomas Jarrard to team, Wilcox v. Swapp
1008	2/5/2019	3	Thomas Jarrard to team, Add Swapp Time Calls
1009	2/6/2019	3	Allison Stovall to team, Wilcox v. Swapp, Attachment
1010	2/6/2019	6	2 emails between team, Swapp
1011	2/6/2019	3	Michelle Fox to team, Wilcox v. Swapp Potential Settlement...
1012	2/6/2019	12	4 emails between team, Wilcox v. Swapp Call re Status..., Attachment
1013	2/6/2019	6	2 emails between team, Swapp Valuation
1014	2/7/2019	6	2 emails between team, Settlement Cert, Attachment
1015	2/7/2019	9	3 emails between team, Wilcox v Swapp Call re Status, Attachment
1016	2/7/2019	6	2 emails between team, Mediation
1017	2/7/2019	3	ECF document review, 112, Defendants' ANSWER to Complaint with jury demand
1018	2/7/2019	3	ECF document review, 113, MOTION for Reconsideration re 109 Order on Motion to Certify Class
1019	2/7/2019	3	Thomas Jarrard to team, Martin v WSP

1020	2/7/2019	6	2 emails between team, Wilcox v Swapp, Attachment
1021	2/7/2019	3	Thomas Jarrard to team, Wilcox v Swapp Call re Status
1022	2/8/2019	24	8 emails between team, Wilcox v Swapp Status Report
1023	2/8/2019	3	Joseph Barton to team, Magistrate no dates
1024	2/8/2019	3	Joseph Barton to team, Wilcox v Swapp Status
1025	2/8/2019	9	3 emails between team, Wilcox v Swapp Status Report
1026	2/8/2019	6	2 emails between team, Wilcox v Swapp: Settlement Demand, Attachment
1027	2/8/2019	45	15 emails between team, Wilcox v Swapp Status Report, Attachment
1028	2/8/2019	3	ECF document review, 114, STATUS REPORT by All Plaintiffs
1029	2/8/2019	3	Kizzie Johnson to team, Wilcox v. Swapp
1030	2/10/2019	3	Joseph Barton to team, Swapp Settlement Certificate, Attachment
1031	2/11/2019	3	ECF document review, 115, MOTION to Certify Appeal by James Craig Swapp, Swapp Law PLLC
1032	2/11/2019	3	Thomas Jarrard to team, Wilcox v Swapp Settlement, Attachment
1033	2/11/2019	3	ECF document review, 116, NOTICE of Appearance by Wesley D Mortensen on behalf of James Craig Swapp, Swapp Law PLLC
1034	2/11/2019	5	Thomas Jarrard to team, FYSA, Attachment
1035	2/11/2019	3	Wilcox v Swapp Settlement Status, Attachment
1036	2/11/2019	3	Joseph Barton to team, Swapp: D's Counsel Rates
1037	2/11/2019	20	3 emails between team, Settlement Cert Response from SWA, review Attachment
1038	2/11/2019	3	Thomas Jarrard to team, Case 2:17-cv-00275-RMP Wilcox v. Swapp et al Motion to Certify Appeal
1039	2/11/2019	3	Joseph Barton to team, Swapp et al Notice of Appearance
1040	2/11/2019	9	3 emails between team, Disqualify, Attachment
1041	2/12/2019	3	Joseph Barton to team, Swapp: Settlement Cert, Attachment
1042	2/12/2019	3	Scott Nelson to team, Kevin Ziober
1043	2/12/2019	3	Joseph Barton to team, Wilcox v. Swapp Settlement, Attachment
1044	2/12/2019	3	Joseph Barton to team, Swapp et al Notice of…
1045	2/12/2019	6	2 emails between team, Swapp et al Notice of Appearance…, Attachment
1046	2/13/2019	3	Joseph Barton to team, Wilcox v Swapp Settlement Status
1047	2/13/2019	6	2 emails between team, Cancel 20th Meeting with investor
1048	2/13/2019	15	5 emails between team, Swapp, Attachment
1049	2/14/2019	12	4 emails between team, Wilcox v Swapp Potential Settlement
1050	2/14/2019	6	2 emails between team, Wilcox v Swapp Potential Settlement
1051	2/14/2019	6	2 emails between team, Wilcox v Swapp Settlement Status
1052	2/14/2019	3	ECF document review, 117, ORDER REFERRING CASE for Mediation and Issuing Stay;
1053	2/15/2019	3	Marcus Sweetser to team, Deposition of Paul Swanston, Attachment
1054	2/15/2019	3	Thomas Jarrard to team, Mortens Notice, Attachment
1055	2/15/2019	3	Joseph Barton to team, Swapp FYI from their Insurance SJ
1056	2/16/2019	3	Jim to team, FW: Deposition of Paul Swanston
1057	2/17/2019	3	Joseph Barton to team, Wilcox v. Swapp: Settlement Demand
1058	2/17/2019	3	Joseph Barton to team, Wilcox v. Swapp Settlement Status
1059	2/18/2019	3	Joseph Barton to team, Swapp: Deposition of Paul Swanston
1060	2/18/2019	33	11 emails between team, Deposition of Paul Swanston, Attachment
1061	2/18/2019	3	Jim Sweetser to team, Mortensen Notice of Appearance
1062	2/18/2019	3	Jim Sweetser to team, Case 2:17-cv-00275-RMP Wilcox v. Swapp et al
1063	2/18/2019	6	2 emails between team, Deposition of Joel Hallberg and Identified, Attachment
1064	2/18/2019	3	Jims Sweetser to team, Deposition of Joel Hallberg, Attachment
1065	2/18/2019	3	Jim Sweetser to team, Swapp Law Depositions, Attachment
1066	2/18/2019	3	Joseph Barton to team, Swapp Meeting and Investigator
1067	2/19/2019	3	ECF document review, 118, SCHEDULING CONFERENCE NOTICE
1068	2/20/2019	90	Team Call pre depo
1069	2/20/2019	18	6 emails between team, CXL Larry alludes
1070	2/20/2019	9	3 emails between team, Mortensen Notice of Appearance Correspondent

1071	2/20/2019	3	Joseph Barton to team, Wilcox v. Swapp
1072	2/20/2019	3	Thomas Jarrard to team, Suk Recent Mediation order, Attachment
1073	2/20/2019	3	J Leviton to team, Swapp: Mortensen Notice of Appearance
1074	2/20/2019	3	Jim Sweetser to team, Suk recent Mediation Order
1075	2/20/2019	3	ECF document review, 119, NOTICE OF WITHDRAWAL AND SUBSTITUTION OF COUNSEL
1076	2/21/2019	6	2 emails between team, Wilcox v. Swapp et al Attorney Withdrawal
1077	2/21/2019	42	14 emails between team, Wilcox v Swapp Settlement Scheduling Hearing
1078	2/21/2019	9	3 emails between team, Jim King
1079	2/22/2019	9	3 emails between team, Swapp
1080	2/22/2019	3	Barbara Duffy to team, Hearing on Settlement Conference
1081	2/27/2019	9	3 emails between team, Swapp Rule 23f Deadline, Attachment
1082	2/27/2019	9	9 emails between team, Swapp Telephonic Hearing
1083	2/27/2019	3	ECF document review, 120, RESETTING SCHEDULING CONFERENCE NOTICE
1084	3/6/2019	60	Settlement and talk with job
1085	3/6/2019	3	Ming Siegel to team, Please email me the court call in info, Attachment
1086	3/6/2019	3	ECF document review, 121, Minute Entry for TELEPHONIC proceedings held before Senior Judge Lonny R. Suko
1087	3/6/2019	45	telephonic conference with Judge Suko
1088	3/18/2019	3	ECF Document Review, 122, ORDER Setting Settlement Conference
1089	3/26/2019	21	7 emails between team, Swapp Letter re: Order on Settlement Conference, Attachment
1090	3/29/2019	9	3 emails between team, Case 2:17-cv-00275-RMP Wilcox v. Swapp et al
1091	3/29/2019	3	ECF Document review, 123, TEXT ORDER; Paragraph 5 of the court's Order Setting Settlement Conference 122 is AMENDED
1092	4/3/2019	9	3 emails to team, Swapp Ds Letter re Production of DS Financial Information
1093	4/8/2019	42	14 emails between team, Wilcox v Craig Swapp et al. Production of financial, Attachment
1094	4/8/2019	9	3 emails between team, Swapp
1095	4/10/2019	3	Lisa Dickinson to team, BKY players
1096	4/10/2019	3	Lisa Dickenson to team, Primer on chapter 11
1097	4/10/2019	3	Lisa Dickinson to team, Utah Lawyer
1098	4/10/2019	6	2 emails between team, Swapp
1099	4/10/2019	3	Lisa Dickinson to team, Utah Bky, Attachment
1100	4/25/2019	6	2 emails between team, Swapp: Order re Settlement Conference
1101	4/26/2019	3	ECF document review, 124, SCHEDULING CONFERENCE NOTICE
1102	4/26/2019	21	7 emails between team, Case 2:17-cv-00275-RMP Wilcox v. Swapp et al Notice of Appearance, Attachment
1103	4/30/2019	3	Marcus Sweetser to team, Please forward me what you can about the other
1104	4/30/2019	3	West economics to team, Asset evaluation, Attachment
1105	4/30/2019	3	ECF document review, 125, Minute Entry for TELEPHONIC proceedings held before Senior Judge Lonny R. Suko: Scheduling Conference
1106	4/30/2019	12	4 emails between team, West cost for Swapp with…
1107	4/30/2019	45	set up call with Eric west re-asset evaluation email records
1108	4/30/2019	30	telephonic conference with Judge Suko
1109	5/1/2019	3	Thomas Jarrard to team, Other Swapp Class Action
1110	5/3/2019	6	2 emails between team, Swapp, Attachment
1111	5/3/2019	3	Thomas Jarrard to team, Swapp Items from west analysis, Attachment
1112	5/3/2019	45	review notes and questions, call with Eric West
1113	5/5/2019	3	Thomas Jarrard to team, Draft Letter…, Attachment
1114	5/6/2019	3	Thomas Jarrard to team, Swapp West's Questions…
1115	5/6/2019	60	prepare letter final draft for mediation
1116	5/7/2019	18	6 emails between team, Swapp- Confidential Letter re Mediation, Attachment
1117	5/7/2019	15	5 emails between team, Swapp - Letter to Suko, Attachment
1118	5/7/2019	3	Elizabeth Calkins to team, Scan, Attachment
1119	5/7/2019	3	Elizabeth Calkins to team, Scan, Attachment
1120	5/7/2019	3	Thomas Jarrard to team, 2:17…, Attachment
1121	5/7/2019	3	Thomas Jarrard to team, Letter to Suko faxed at 1500, Attachment

1122	5/7/2019	45	prep and send Judge Suko letter
1123	5/8/2019	3	Thomas Jarrard to team, Hotel for mediation May 19-20
1124	5/8/2019	3	Thomas Jarrard to team, Hotel for Mediation May 22-23
1125	5/9/2019	3	Joseph Barton to team, Ziober: Deposition
1126	5/16/2019	3	Elizabeth Calkins to team, Scan, Attachment
1127	5/17/2019	3	Jade Wilcox to team, Hotel for Mediation May 19-20
1128	5/17/2019	3	Thomas Jarrard to team, Jim King
1129	5/18/2019	3	Marcus Sweetser to team, Jim King Intel…
1130	5/18/2019	3	Bill Gilbert to team, email re opposing cousel on related cases
1131	5/18/2019	3	Jade Wilcox to team, Hotel for Mediation May 19-20
1132	5/20/2019	3	Joseph Barton to team, Swapp: Jim King intel in opposition counsel in…
1133	5/20/2019	6	2 emails between team, Wilcox v. Craig Swapp…, Attachment
1134	5/20/2019	90	review asset letter and productions from Jim king and call with Eric west
1135	5/21/2019	30	Review final anaysis for mediation
1136	5/21/2019	30	West economics to team, Wilcox v Craig… review and call Erick
1137	5/21/2019	3	Thomas Jarrard to team, Updated Financial records re Wilcox, Attachment
1138	5/22/2019	180	travel to Yakima
1139	5/23/2019	6	2 emails between team, Plaintiff's Production
1140	5/23/2019	15	5 emails between team, My Hotel in Yakima
1141	5/23/2019	3	Thomas Jarrard to team, Settlement items
1142	5/23/2019	3	Thomas Jarrard to team, Swapp Agreement in Principle
1143	5/23/2019	180	travel from Yakima
1144	5/23/2019	660	mediation with Judge Suko
1145	5/23/2019	3	ECF Document review, 126, Minute Entry for proceedings held before Senior Judge Lonny R. Suko
1146	5/24/2019	3	West Inc. to team, Settlement items Swapp
1147	5/24/2019	9	3 emails between team, Swapp Agreement in principal
1148	5/24/2019	3	Fred Karau to team, out of office
1149	5/28/2019	3	Fred Karau to team, Wilcox v. Swapp Mediation, Attachment
1150	5/28/2019	3	ECF document review, 127, Incorrect Transcript NO LONGER AVAILABLE see ECF 128 NOTICE OF FILING OF OFFICIAL TRANSCRIPT of Settlement
1151	5/28/2019	3	Joseph Barton to team, Swapp Agreement
1152	5/29/2019	3	West Economics o team, Swapp send the updated invoice, Attachment
1153	5/30/2019	45	Jim Sweetser to team, Do we have the final agreement to be signed by the party, review settlment transcript for errors
1154	5/30/2019	3	Joseph Barton to team, do we have the final agreement to be signed
1155	5/31/2019	180	Review settlemetn items and transcript
1156	6/5/2019	15	5 emails between team, Swapp Transcript of Settlement, Attachment
1157	6/6/2019	3	Joseph Barton to team, Full 9th Circ. Hyundai, Kia Settlement Decision, attachment
1158	6/11/2019	3	Thomas Jarrard to team, Swapp Settlement
1159	6/13/2019	3	ECF document review, 128, TRANSCRIPT Ct. Rec. 127 CORRECTED Correct Speaker Identification and a typo
1160	6/13/2019	3	Lynette Waterson to team, Wilcox v. Swapp, Attachment
1161	6/18/2019	6	2 emails between team, Swapp Settlement
1162	7/19/2019	20	6 emails between team, Swapp Settlement Payment
1163	7/23/2019	45	13 emails between team, Swapp Settlement Payment, Attachment
1164	7/23/2019	3	Thomas Jarrard to team, Doc Jul 23, 2019, Attachment
1165	7/24/2019	3	Joseph Barton to team, Swapp Escrow Agreement
1166	7/24/2019	3	Jessica Doucette to team, Voicemail
1167	7/30/2019	18	6 emails between team, Swapp Letter, Attachment
1168	8/9/2019	3	ECF Document review, 129, TEXT-ONLY ORDER (no PDF will issue). On February 14, 2019, this case was referred to Senior Judge Lonny R. Suko
1169	8/13/2019	9	3 emails between team, Case 2:17-cv-00275-RMP Wilcox v. Swapp et al
1170	8/14/2019	3	Thomas Jarrard to team, Check on Swapp case
1171	8/14/2019	6	2 emails between team, Swapp: Settlement Escrow Account, Attachment
1172	8/18/2019	3	Joseph Barton to team, Wilcox v Swapp et al.

1173	8/26/2019	90	settlement agreement review
1174	8/26/2019	3	Joseph Barton to team, Wilcox v Swapp et al. Settlement certificate
1175	8/26/2019	12	4 emails between team, Swapp - Settlement Agreement - 08-26-2019, Attachment
1176	8/27/2019	6	2 emails between team, Swapp Settlement Certificate, Attachment
1177	8/29/2019	15	5 emails between team, Wilcox v. Swapp et al. Settlement Certificate, Attachment
1178	8/29/2019	3	ECF document review, 130, SETTLEMENT STATUS CERTIFICATE BY ALL PARTIES
1179	8/30/2019	3	Colin Downes to team, Swapp - Class Notice, Attachment
1180	9/6/2019	6	2 emails between team, Wilcox v. Swapp et al. Settlement Agreement, Attachment
1181	9/6/2019	3	ECF document review, 131, NOTICE OF WITHDRAWAL OF COUNSEL by Barbara J Duffy
1182	9/6/2019	3	ECF document review, 132, NOTICE OF WITHDRAWAL OF COUNSEL by Ryan P McBride
1183	9/6/2019	3	ECF document review, 133, NOTICE OF WITHDRAWAL OF COUNSEL by Taylor Washburn
1184	9/9/2019	3	Kathy Schulman to team, Swapp - Class Notice
1185	9/10/2019	3	Nina Martinez to team, L-3 Individual Settlement Payments and Attorneys' Fees
1186	9/10/2019	3	Joseph Barton to team, Swapp- Class Notice
1187	9/23/2019	9	3 emails between team, Swapp - Class Data
1188	9/23/2019	30	Review class data re duplicates from Kizzy
1189	9/24/2019	6	2 emails between team, Swapp - Motion for Preliminary Approval
1190	9/28/2019	9	3 emails between team, Wilcox v. Swapp-Identification of Class Plaintiff's
1191	10/3/2019	3	Joseph Barton to team, Swapp Settlement Agreement, Attachment
1192	10/4/2019	15	Colin Downes to team, Swapp - and File Settlement Certificate
1193	10/4/2019	3	ECF Document review, 134, SETTLEMENT STATUS CERTIFICATE by Jade Wilcox.
1194	10/10/2019	3	Colin Downes to team, Swapp - Preliminary Approval Motion
1195	10/10/2019	27	9 emails between team, Wilcox v Swapp et al. Settlement Agreement
1196	10/10/2019	6	2 emails between team, Swapp - Preliminary Approval Motion
1197	10/10/2019	3	Thomas Jarrard to team, TO do
1198	10/15/2019	15	5 emails between team, Mtn Exceed Page Limit
1199	10/15/2019	3	Thomas Jarrard to team, Krzyminski v. Spokane County…
1200	10/15/2019	30	Prep and file MOTION for Leave to File Excess Pages Re Motion for Preliminary Approval of Settlement by Jade Wilcox.
1201	10/15/2019	3	ECF document review, 136, NOTICE by All Defendants re 135 MOTION for Leave to File Excess Pages Re Motion for Preliminary Approval
1202	10/15/2019	3	Kathy Schulman to team, Wilcox v Swapp et al. Settlement Agreement
1203	10/15/2019	3	ECF document review, 137, TEXT-ONLY ORDER (no PDF will issue) granting ECF No. 135 , Plaintiff's Unopposed Motion for Leave to File Excess
1204	10/16/2019	15	3 emails between team, Wilcox v Swapp et al. Settlement Agreement, Attachment
1205	10/16/2019	15	5 emails between team, Wilcox v Swapp -Settlement Certificate, Attachment
1206	10/16/2019	3	ECF document review, 138, SETTLEMENT STATUS CERTIFICATE by All Plaintiffs.
1207	10/16/2019	3	Kizzie Christensen to team,Wilcox v. Swapp-Identification of Class Plaintiffs, Attachment
1208	10/18/2019	3	Joseph Barton to team, Wilcox v. Swapp hearing date
1209	10/20/2019	12	4 emails between team, Wilcox v. Swapp, Attachment
1210	10/20/2019	3	Thomas Jarrard to team, Swapp Draft Agreement, Attachment
1211	10/21/2019	30	Kizzie Christensen to team, Wilcox v. Swapp-Identification…, Attachment Review class data
1212	10/23/2019	3	Joseph Barton to team, Wilcox v Swapp et al
1213	10/24/2019	3	Colin Downes to team, Swapp - Hearing Date
1214	10/24/2019	3	Ming Siegel to team, Swapp
1215	10/24/2019	12	4 emails between team, Preliminary Approval Hearing
1216	10/25/2019	3	Colin Downes to team, Wilcox v. Swapp: Settlement
1217	10/25/2019	9	3 emails between team, Wilcox v Swapp et al. Settlement Agreement, Attachment
1218	10/25/2019	20	File Unopposed MOTION for Settlement Plaintiff's Unopposed Motion for Preliminary Approval of Class Action
1219	10/25/2019	3	RMP Chambers to team, Case 2:17-cv-00275-RMP Wilcox v. Swapp et al
1220	10/25/2019	6	2 emails between team, Case 2:17-cv-00275-RMP Wilcox v. Swapp et al
1221	10/25/2019	3	ECF document review, 140, minute entry
1222	10/28/2019	6	2 emails between team, Swapp and Wilcox case
1223	10/29/2019	45	Review Settlment Agreement, no eidt

1224	10/29/2019	3	Thomas Jarrard to team, Swapp case on Law 360
1225	10/29/2019	6	2 emails between team, Swapp Caption
1226	10/30/2019	3	Joseph Barton to team, Wilcox v. Swapp-Identification of Class
1227	10/31/2019	12	4 emails between team, Andrews v Sirius XM Radio, Attachment
1228	11/21/2019	3	Jade Wilcox to team, Swapp Draft Agreement
1229	11/22/2019	3	Joe Barton to team, Recent Decision on fees
1230	11/22/2019	3	Colin Downes to team, Recent Decision on fees, Attachment
1231	11/25/2019	3	J Barton to team, Andrews v. Sirius XM, Attachment
1232	11/25/2019	3	J Barton to team, Wiles v. Southwest Bill Telephone, Attachment
1233	11/25/2019	90	Prep and Hearing on preliminary approval with Joe, bring cases
1234	11/27/2019	3	ECF document review, 141, ORDER GRANTING 139 PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT
1235	12/3/2019	6	2 emails between team, Swapp - Class Data, Attachment
1236	12/10/2019	3	Joseph Barton to team, Swapp - Class Data
1237	12/10/2019	6	2 emails between team, Wilcox v. Swapp
1238	12/19/2019	3	AJ Jeter to team, Wilcox v. Swapp - Settlement Administration
1239	12/19/2019	15	3 emails between team, Swapp fees
1240	12/22/2019	6	2 emails between team, Wilcox v. Swapp, Attachment
1241	12/23/2019	30	Review class notice
1242	12/23/2019	30	Review class notice
1243	12/24/2019	180	Review time I the matter, costs receipts and edit, email to Colin
1244	12/24/2019	180	Review time I the matter, costs receipts and edit, email to Colin
1245	12/24/2019	10	Thoams Jarrard to team, Swapp Fees and costs, Atatchment
1246	12/24/2019	180	Review time I the matter, costs receipts and edit, email to Colin
1247	12/26/2019	5	Joseph Barton to team, Swapp Fees and costs & service award for notice
1248	12/26/2019	3	2 emails between team, Wilcox v. Swapp - Settlement Administration
1249	12/26/2019	5	7 emails between team, Swapp Fees and Costs & Service awaerd, Atatchemnt
1250	12/26/2019	3	Thomad Jarrard to team, Hours
1251	12/27/2019	15	7 emails between team, Wilcox v. Swapp - Settlement Sdministration, Atatchemnt
1252	12/28/2019	3	Joseph Barton to team, Wilcox v. Swapp - Settlement Administration - Updated Class
1253	12/29/2019	5	3 emails between team, Swapp: Sweetser Hours
1254	12/30/2019	3	2 emails between team, Swapp service award for notice
1255	1/1/2020	3	2 emails between team, Swapp - Class Data, Attachment
1256	1/1/2020	3	Joseph Barton to team, Swapp - Exclusion from class data, Atatchment
1257	1/2/2020	3	2 emails between team, Swapp - Class Data, Atatchemnt
1258	1/3/2020	3	2 emails between team, Swapp - Direction Letter re Notice Expenses
1259	1/6/2020	3	2 emails betweent eam, Swapp Fees and Costs for Notice
1260	1/6/2020	3	2 emails between team, Swapp - Direction Letter re Notice Expenses, Attachment
1261	1/6/2020	5	3 emails between team, Swapp DPPA Settlement Fund Letter re Wire Transfer, Atatchemnt
1262	1/7/2020	30	Reveiew Class Notice Web Page FAQs and contacts tabs
1263	1/8/2020	3	5 emails between team, Wilcox v Swapp - Settlement Administration
1264	1/8/2020	3	4 emails between team, Swapp Fees and costs
1265	1/10/2020	5	Class member call regarding class notice
1266	1/10/2020	5	Call re change address by class member
1267	1/12/2020	5	Call re change address by class member
1268	1/12/2020	5	Call re change address by class member
1269	1/14/2020	5	Call re change address by class member
1270	1/14/2020	5	Call re change address by class member
1271	1/15/2020	5	Class member call regarding class notice
1272	1/15/2020	5	Call re change address by class member
1273	1/16/2020	5	Call re change address by class member
1274	1/16/2020	5	Call re change address by class member

1275	1/16/2020	5	Call re change address by class member
1276	1/16/2020	30	Three emails and responses to Anno Volosenko re class notice
1277	1/22/2020	10	Class member call regarding class notice
1278	1/25/2020	5	Call re change address by class member
1279	1/26/2020	5	Call re change address by class member
1280	1/27/2020	5	Call re change address by class member
1281	1/28/2020	5	Call re change address by class member
1282	1/29/2020	20	File declaration
1283	1/29/2020	30	Call with AJ Exclusion of Swapp Cleints who got notice by mistake, how to handel those.
1284	1/31/2020	10	Email and call with class member Cheryl Ahrendt re class notice
1285	1/31/2020	10	Class member call regarding class notice
1286	1/31/2020	5	Call re change address by class member
1287	2/1/2020	5	Email with Tammy Cook Class member re notice and questipons
1288	2/4/2020	5	Call re change address by class member
1289	2/4/2020	5	Call re change address by class member
1290	2/5/2020	15	AJ jetter Exclusion
1291	2/6/2020	5	Call re change address by class member
1292	2/7/2020	5	Class member call regarding class notice
1293	2/10/2020	5	Call re change address by class member
1294	2/12/2020	5	Call re change address by class member
	Total Hours	**253.08**	

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JADE WILCOX, on behalf of herself and all others similarly situated, Plaintiffs, v. SWAPP LAW, PLLC, d/b/a CRAIG SWAPP AND ASSOCIATES, and JAMES CRAIG SWAPP, individually, Defendants	Case No. 2:17-cv-275-RMP Related to Case No. 2:17-cv-122-RMP **DECLARATION OF JAMES R SWEETSER IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, James R Sweetser, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am competent to testify and make this declaration based on my personal knowledge.

2. I have been an attorney at law since 1984.

3. I am licensed in Federal Court, and States of Washington and Idaho.

4. After graduating from Gonzaga Law School, I worked as a prosecutor for 14 years. My last 4 years at the prosecutor's office were as the elected prosecutor of Spokane County, a community of approximately 450,000 people at the time. I am an experienced litigator handling many high profile and complex cases.

5. I have practiced civil litigation for the last 22 years. The practice has grown into 3 full time attorneys, soon to be 4, 2 paralegals, 2 legal assistants, and an office accountant/financial administrator.

6. At the time of my firm's investigation into the practice that led to the filing of this class action, personal injury victims and the lead class plaintiff, Jade Wilcox, sought legal assistance from Sweetser Law Office. Ms. Wilcox and others provided letters with the signature of Craig Swapp, along with their Washington State Patrol collision report that came with the letter in the mail only days after their collisions.

7. Our office investigated how Swapp had done this, and whether it was legal and ethical. In a related suit, against the Washington State Patrol, we moved for a temporary injunction in federal court that the wholesale and indiscriminate selling and

obtainment of WSP collision reports to attorneys for direct solicitation purposes was a violation of the Driver's Privacy Protection Act that did not fall into one of the 14 exceptions under DPPA. The injunction was granted requiring the Washington State Patrol to change practices of selling collision information without a driver's consent or establishing one of the 14 exceptions to the DPPA.

8. Sweetser Law Office associated with the law office of Thomas Jarrard, an experienced class action attorney who recommended Joseph Barton as an experienced class action attorney from a Washington D.C. firm, to assist with a class action against Craig Swapp for violating the DPPA.

9. Our office kept contemporaneous hours for the majority of the work on this suit. My paralegal Kizzie Johnson has been tasked with the responsibility of organizing the billable hours for this petition.

10. My practice is primarily contingency fee based. When calculating the costs of doing business, the rate of $550 is commensurate with other attorneys billing for federal class litigation work in the Spokane community with 36 years of experience.

11. If my attorney fees were calculated from my past three years of contingency fee work, my hourly rate exceeds $700 per hour after all expenses are paid.

12. Marcus Sweetser was instrumental to me in this litigation by providing research, legal writing, briefing on issues associated with factual disputes and legal

disputes. Through our office, we gathered a lot of the critical factual information and legal analysis that was provided to the team and was of great assistance. Marcus Sweetser has been a practicing attorney for approximately 3 years, but had worked over the summer for 7 to 8 years, prior to going to law school. In my view, he was the driving force behind bring this issue before the Federal Court in the first place. He has civil litigation experience and recently won verdicts of $1.695 million and $265,000. Marcus Sweetser's billable fee has not been formally established at the firm, but I recommend consideration of $375.00 per hour.

13. Paralegal Kizzie Johnson has worked for me for 19 years, and handles complex litigation and discovery. She is knowledgeable in all areas of litigation, and performs duties far in excess of normal paralegal duties. She has been instrumental in organizing facts, identifying class members, and other important tasks to ligation. For a reasonable fee for her services and time, in addition to the costs of employment, I recommend at $200.00 per hour.

14. Other staff also worked on the case including legal assistants Liz York and Jess Christensen. Liz York has worked for me for 12 years. Jess Christensen has worked for me for 10 years. Liz York performs duties of equivalent to a paralegal. Jess Christensen performs duties of a legal assistant.

15. Attached hereto as Exhibit A through D is an accurate copy of our firm's record of time in this matter.

Name	Title	Rate	Hours	Fee
James R Sweetser	Attorney/Partner	$ 550.00	173.85	$ 95,617.50
Marcus Sweetser	Trial Attorney	$ 375.00	95.95	$ 35,981.25
Kizzie Johnson	Head Paralegal	$ 200.00	61.71	$ 12,342.00
Dan Eigler	Associate Attorney	$ 300.00	2.70	$ 810.00
Total				**$144,750.75**

16. Prior to preparing this record of time for submission to the Court, I reviewed these time records with the assistant of my colleague and co-counsel Marcus Sweetser. Just as counsel would prior to sending bills to paying clients, we removed time entries for duplicative or unnecessary work.

17. Throughout this matter, I also maintained the records for the expenses I incurred in such a manner to reflect each discrete cost attributed to this case from 2014 to present. Throughout this case, I spent $5,139.56. on expenses, excluding, meals, legal research fees, and PACER access costs. The following table provides a summary of the expenses incurred by Sweetser Law Office PLLC in this matter.

Cost Description	Amount
Parking	$ 5.36
Service Costs	$ 50.00
Court Reporting	$ 184.20
Payment US Dist. Ct	$ 400.00
Retention and Services of Attorney Michael Love[1]	$ 3600.00
Notebooks and Case binders	$ 80.00
Postage	$ 20.00

[1] Attorney Michael Love was employed to contest to broad subpoenas issued upon Mr. Sweetser and Sweetser Law Office, counsel in this matter, which the Court ultimately quashed. ECF 106.

Copying costs	$ 800.00
Total	**$ 5,139.56**

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

DATED February 24, 2020.

/s/ James R Sweetser
James R Sweetser

Exhibit A

JAMES R. SWEETSER TIME FOR WILCOX V. SWAPP CASE

Date	Client	Project	Description of Work	Rate/Unit Price	Labor Time/ Quantity	In Minutes	Billable Time/ Cost Price	Bill Amt Swapp
8/15/2014	Wash DPPA	Swapp	E-mails to list serve RE: Public Records Requests and direct mailings and PRA for commercial use (improper solicitations)	$550.00	0.50	30.00	0.50	$ 275.00
3/27/2015	Wash DPPA	Swapp	E-mails back and forth to Scott RE grievance letter and modifications.	$550.00	0.50	30.00	0.50	$ 275.00
3/31/2015	Wash DPPA	Swapp	Grievance Against Swapp; research etc. Emails with Scott, etc.	$550.00	6.00	360.00	6.00	$ 3,300.00
5/4/2015	Wash DPPA	Swapp	Reviewed Swapp 4/28/15 Response Letter to WSBA	$550.00	0.75	45.00	0.75	$ 412.50
5/4/2015	Wash DPPA	Swapp	Review PDR from Attorney General Office re swapp Pg JRS 00001--85	$550.00	1.00	60.00	1.00	$ 550.00
5/8/2015	Wash DPPA	Swapp	Letter to Felice Congalton WSBA Reply	$550.00	1.50	90.00	1.50	$ 825.00
5/20/2015	Wash DPPA	Swapp	Reviewed WSBA letter to Swapp	$550.00	0.25	15.00	0.25	$ 137.50
6/11/2015	Wash DPPA	Swapp	Reviewed Swapp 6/5/15	$550.00	0.50	30.00	0.50	$ 275.00
6/22/2015	Wash DPPA	Swapp	Letter to Powell Reply to Swapp Resp. 6/5/15 and 6/17/15 letter from Powell	$550.00	1.50	90.00	1.50	$ 825.00
7/7/2015	Wash DPPA	Swapp	Reviewed WSBA letter to Swapp	$550.00	0.50	30.00	0.50	$ 275.00
7/11/2015	Wash DPPA	Swapp	Reviewed Swapp 6/5/15 Resp. to Office of Disciplinary Counsel	$550.00	0.50	30.00	0.50	$ 275.00
7/31/2015	Wash DPPA	Swapp	Letter to Powell Additional evidence f/u investigation progression and e-mails.	$550.00	1.25	75.00	1.25	$ 687.50
8/5/2015	Wash DPPA	Swapp	Reviewed WSBA letter to Swapp	$550.00	1.00	60.00	1.00	$ 550.00
8/27/2015	Wash DPPA	Swapp	Reviewed Isaiah's research on DPPA opnions	$550.00	1.00	60.00	1.00	$ 550.00
8/31/2015	Wash DPPA	Swapp	reviewed WSBA 8/28/15 letter and Swapp 8/24/15 Letter and Ex. A	$550.00	0.75	45.00	0.75	$ 412.50
9/2/2015	Wash DPPA	Swapp	Sweetser to WSBA reviewed draft reply from Isaiah to Swapp resp. to grievance	$550.00	1.00	60.00	1.00	$ 550.00
9/3/2015	Wash DPPA	Swapp	Finalized Reply to Swapp Resp. to Grievance	$550.00	0.75	45.00	0.75	$ 412.50
9/4/2015	Wash DPPA	Swapp	Final signed-one last read throughReply to Swapp Resp. to Grievance	$550.00	0.25	15.00	0.25	$ 137.50
9/18/2015	Wash DPPA	Swapp	Reviewed WSBA letter to Swapp	$550.00	0.50	30.00	0.50	$ 275.00
10/28/2015	Wash DPPA	Swapp	Letter to Powell Requesting update on investigation and providing additional evidence	$550.00	1.00	60.00	1.00	$ 550.00
2/8/2016	Wash DPPA	Swapp	Reviewed emails from Swapp and responded to email	$550.00	0.75	45.00	0.75	$ 412.50
2/10/2016	Wash DPPA	Swapp	Reviewed email from Swapp & Marcus regarding meeting	$550.00	1.00	60.00	1.00	$ 550.00
2/11/2016	Wash DPPA	Swapp	Reviewed e-mail from Swapp	$550.00	0.10	6.00	0.10	$ 55.00
2/16/2016	Wash DPPA	Swapp	E-mails with Craig Swapp RE Bar response & e-mails with Marcus	$550.00	0.30	18.00	0.30	$ 165.00

3/28/2016	Wash DPPA	Swapp	Reviewed WSBA Response-via Powell dated 3/24/16 Findings with attached 9/28/15 Swapp Letter and Powell 7/30/15 grievance investigation letter	$550.00	0.75	45.00	0.75	$	412.50
3/28/2016	Wash DPPA	Swapp	Reviewed Craig Swapp Letter to WSBA dated 9/28/15	$550.00	0.50	30.00	0.50	$	275.00
3/29/2016	Wash DPPA	Swapp	Reviewed WSBA Response via Powell dated 3/24/16 Findings with attached 9/28/15 Swapp Letter and	$550.00	1.25	75.00	1.25	$	687.50
3/29/2016	Wash DPPA	Swapp	Researched ELC Procedural Rules, RPC and Court cases	$550.00	3.25	195.00	3.25	$	1,787.50
3/29/2016	Wash DPPA	Swapp	Drafted Appeal to WSBA Decision	$550.00	1.50	90.00	1.50	$	825.00
3/29/2016	Wash DPPA	Swapp	Summarized ELC procedural standards	$550.00	1.25	75.00	1.25	$	687.50
3/29/2016	Wash DPPA	Swapp	Reviewed Marcus's Draft Motion	$550.00	0.75	45.00	0.75	$	412.50
3/29/2016	Wash DPPA	Swapp	Reviewed email from marcus regarding RPC research, spoke w/ marcus and e-mails to listserve RE PDR to get accident reports	$550.00	2.50	150.00	2.50	$	1,375.00
3/30/2016	Wash DPPA	Swapp	Editted and Send Draft Motion Back	$550.00	4.00	240.00	4.00	$	2,200.00
3/30/2016	Wash DPPA	Swapp	Reviewed Draft Motion Back	$550.00	0.50	30.00	0.50	$	275.00
3/30/2016	Wash DPPA	Swapp	Finalized WSBA Motion	$550.00	0.75	45.00	0.75	$	412.50
3/30/2016	Wash DPPA	Swapp	Letter to Doug Ende Office Disciplinary Counsel WSBA - Challenge to Review Committtee	$550.00	3.50	210.00	3.50	$	1,925.00
4/14/2016	Wash DPPA	Swapp	Reviewed entire WSBA Grievance File	$550.00	3.50	210.00	3.50	$	1,925.00
4/14/2016	Wash DPPA	Swapp	Reviewed 4/11/16 letter from Douglas Ende WSBA regarding Grievance Options	$550.00	0.75	45.00	0.75	$	412.50
4/14/2016	Wash DPPA	Swapp	Filled out and Sent Grievance Request Option to WSBA	$550.00	0.10	6.00	0.10	$	55.00
4/15/2016	Wash DPPA	Swapp	Reviewed Letter from WSBA Christine Gray re reopening of Grievance	$550.00	0.10	6.00	0.10	$	55.00
4/19/2016	Wash DPPA	Swapp	Reviewed Letter from WSBA Christine Gray re reopening of Grievance	$550.00	0.50	30.00	0.50	$	275.00
4/23/2016	Wash DPPA	Swapp	Reviewed WSBA Response- Powell 7/30/15 grievance investigation letter	$550.00	1.20	72.00	1.20	$	660.00
4/23/2016	Wash DPPA	Swapp	Draft motion to Redact and Seal WSBA Decision	$550.00	0.75	45.00	0.75	$	412.50
4/25/2016	Wash DPPA	Swapp	Reviewed Swapp's WSBA letters	$550.00	1.50	90.00	1.50	$	825.00
4/25/2016	Wash DPPA	Swapp	Reviewed edits on motion to Redact and Seal WSBA Decision	$550.00	0.75	45.00	0.75	$	412.50
4/25/2016	Wash DPPA	Swapp	Finalized motion to Redact and Seal WSBA Decision	$550.00	1.25	75.00	1.25	$	687.50
4/25/2016	Wash DPPA	Swapp	Letter to Christine Gray WSBA- f/u Reopening bar complaint	$550.00	1.50	90.00	1.50	$	825.00
4/26/2016	Wash DPPA	Swapp	Ethics Board Reopening Letter Draft-research, etc.	$550.00	6.00	360.00	6.00	$	3,300.00
4/28/2016	Wash DPPA	Swapp	email to Gray and reviewing documents	$550.00	1.00	60.00	1.00	$	550.00
4/29/2016	Wash DPPA	Swapp	Emails to and from Gray	$550.00	0.50	30.00	0.50	$	275.00
5/1/2016	Wash DPPA	Swapp	Ethics Board ReOpening final Version Letter	$550.00	1.50	90.00	1.50	$	825.00
5/2/2016	Wash DPPA	Swapp	Draft Reply to James Craig Swapp's September 28, 2015 Response	$550.00	3.50	210.00	3.50	$	1,925.00
5/2/2016	Wash DPPA	Swapp	Email to Christine Gray re reply and working on complaint to WSBA	$550.00	1.50	90.00	1.50	$	825.00

5/3/2016	Wash DPPA	Swapp	Email to Christine Gray with Reply	$550.00	0.10	6.00	0.10	$	55.00
6/6/2016	Wash DPPA	Swapp	Reviewed short appeal of WSBA Decision	$550.00	0.25	15.00	0.25	$	137.50
6/6/2016	Wash DPPA	Swapp	Reviewed WSBA 5/27/16 Decision on Grievance, discussed w/ Staff etc.	$550.00	3.50	210.00	3.50	$	1,925.00
6/6/2016	Wash DPPA	Swapp	Appeal to Greievance Against Swapp	$550.00	1.00	60.00	1.00	$	550.00
7/29/2016	Wash DPPA	Swapp	E-mails to listserve and Marcus regarding direct mailing and use of public records to harvest names	$550.00	1.25	75.00	1.25	$	687.50
8/15/2016	Wash DPPA	Swapp	Discplinary Board Appeal Policies, Exhaustion Procedures, Disciplinary Board Roster, and Sweetser ltr to Gray June 6 reviewed	$550.00	3.00	180.00	3.00	$	1,650.00
8/22/2016	Wash DPPA	Swapp	Reviewed emails from Swapp agent attorney. Drafted strategy for class action or legislative fix, drafted talking points memo, outlining research priorities	$550.00	3.00	180.00	3.00	$	1,650.00
8/25/2016	Wash DPPA	Swapp	Researched nationwide DPPA caselaw, Pavone, Mariach v Spears etc.	$550.00	10.50	630.00	10.50	$	5,775.00
8/29/2016	Wash DPPA	Swapp	Drafted email outlining DPPA liquidated damages and elements to prove case	$550.00	0.50	30.00	0.50	$	275.00
8/29/2016	Wash DPPA	Swapp	emails with marcus regarding draft dppa letter	$550.00	0.50	30.00	0.50	$	275.00
8/31/2016	Wash DPPA	Swapp	Researched DPPA class action Complaints nationwide	$550.00	1.50	90.00	1.50	$	825.00
8/31/2016	Wash DPPA	Swapp	Drafted WSBA Response to DPPA Decision	$550.00	2.00	120.00	2.00	$	1,100.00
9/1/2016	Wash DPPA	Swapp	DPPA Letter for Review Committee provided to WSBA Christine Gray	$550.00	0.50	30.00	0.50	$	275.00
9/1/2016	Wash DPPA	Swapp	Motion to Stay Decision until review Committee Reviews DPPA Materials	$550.00	1.00	60.00	1.00	$	550.00
9/1/2016	Wash DPPA	Swapp	Letter to Christine Gray WSBA DPPA additional Information	$550.00	1.50	90.00	1.50	$	825.00
9/6/2016	Wash DPPA	Swapp	Drafted Motion for Reconsideration of DPPA Decision to WSBA Kevin Banks	$550.00	2.00	120.00	2.00	$	1,100.00
9/6/2016	Wash DPPA	Swapp	Overview of Swapp's DPPA violations Drafted	$550.00	1.00	60.00	1.00	$	550.00
9/6/2016	Wash DPPA	Swapp	E-mails with Kevin Bank RE PDR and grievance	$550.00	1.00	60.00	1.00	$	550.00
9/22/2016	Wash DPPA	Swapp	Reviewed Swapp 9/13/16 Letter to AG office	$550.00	0.25	15.00	0.25	$	137.50
9/22/2016	Wash DPPA	Swapp	Response re: Swapp's deadline	$550.00	0.25	15.00	0.25	$	137.50
9/26/2016	Wash DPPA	Swapp	Researched Appeal of WSBA Decision to Wa. State Supreme Court	$550.00	0.75	45.00	0.75	$	412.50
11/9/2016	Wash DPPA	Swapp	Reviewed WSBA 11/9/16 letter and Swapp 10/31/16 Resp.	$550.00	0.50	30.00	0.50	$	275.00
1/25/2017	Wash DPPA	Swapp	Discussion to Move forward with Class Action over Appeal to Supreme Court	$550.00	0.25	15.00	0.25	$	137.50
2/22/2017	Wash DPPA	Swapp	Re-attaching Class Complaint for Review and Finalization, ask for approval to file	$550.00	0.25	15.00	0.25	$	137.50
2/27/2017	Wash DPPA	Swapp	Re-attaching Class Complaint and TRO for Review and Finalization, ask for approval to file	$550.00	0.25	15.00	0.25	$	137.50

2/28/2017	Wash DPPA	Swapp	Providing docs to Barton for joining action	$550.00	0.25	15.00	0.25	$	137.50
3/3/2017	Wash DPPA	Swapp	Decline from Barton, ask for approval to file	$550.00	0.25	15.00	0.25	$	137.50
6/12/2017	Wash DPPA	Swapp	Barton discussion re: Class Counsel	$550.00	0.25	15.00	0.25	$	137.50
7/14/2017	Wash DPPA	Swapp	Review of the proposed Co-counsel agreement with Joe Barton	$550.00	0.50	30.00	0.50	$	275.00
7/19/2017	Wash DPPA	Swapp	Multiple Requester Spreadsheets	$550.00	2.00	120.00	2.00	$	1,100.00
7/21/2017	Wash DPPA	Swapp	Reviewing e-mails of conference yesterday. Preparing for meeting with Joe Barton and Tom Jarrard on multiple requestors. Reviewed spread sheet with over 200,000 requests in the last 5 years.	$550.00	3.20	192.00	3.20	$	1,760.00
7/21/2017	Wash DPPA	Swapp	Telephone conference with co-counsel.	$550.00	0.50	30.00	0.50	$	275.00
8/1/2017	Wash DPPA	Swapp	Reviewing retainer agreement with co-counsel and contacting the client to come in for meeting	$550.00	0.40	24.00	0.40	$	220.00
8/3/2017	Wash DPPA	Swapp	Meet with client to sign contingency agreement to associate Joe and Thomas from Washington D.C. E-mails to co counsel	$550.00	1.20	72.00	1.20	$	660.00
8/3/2017	Wash DPPA	Swapp	Barton email regarding insurance coverage issues	$550.00	0.25	15.00	0.25	$	137.50
8/4/2017	Wash DPPA	Swapp	Read and revised the complaint, and emailed revised complaint to co-counsel for review and approval	$550.00	0.90	54.00	0.90	$	495.00
8/4/2017	Wash DPPA	Swapp	Barton edits to class complaint	$550.00	2.50	150.00	2.50	$	1,375.00
8/4/2017	Wash DPPA	Swapp	Email re: class complaint back to Barton	$550.00	1.00	60.00	1.00	$	550.00
8/6/2017	Wash DPPA	Swapp	Barton edits to class complaint	$550.00	0.75	45.00	0.75	$	412.50
8/6/2017	Wash DPPA	Swapp	Finding and providing Swapp emails to Barton	$550.00	1.50	90.00	1.50	$	825.00
8/7/2017	Wash DPPA	Swapp	Phone conference Jarrard, Joe, Jim on definition of class and time line for violations.	$550.00	0.50	30.00	0.50	$	275.00
8/7/2017	Wash DPPA	Swapp	Reviewed MEMO on Multiple Requestors spreadsheet	$550.00	0.50	30.00	0.50	$	275.00
8/7/2017	Wash DPPA	Swapp	Email re: class complaint back to Barton	$550.00	1.50	90.00	1.50	$	825.00
8/7/2017	Wash DPPA	Swapp	Jarrard email re: class definition	$550.00	0.50	30.00	0.50	$	275.00
8/7/2017	Wash DPPA	Swapp	Scheduled class definition call	$550.00	0.10	6.00	0.10	$	55.00
8/9/2017	Wash DPPA	Swapp	Revised class definition provided	$550.00	0.50	30.00	0.50	$	275.00
8/10/2017	Wash DPPA	Swapp	Finding and providing Grievance emails to Barton	$550.00	2.00	120.00	2.00	$	1,100.00
8/10/2017	Wash DPPA	Swapp	Identifying critical Greivance Letter putting Swapp on Notice	$550.00	0.50	30.00	0.50	$	275.00
8/11/2017	Wash DPPA	Swapp	Finalized Response to Motion to Certify	$550.00	5.00	300.00	5.00	$	2,750.00
8/15/2017	Wash DPPA	Swapp	Responding to e-mails from co-counsel about next defendant and lead plaintiffs	$550.00	0.20	12.00	0.20	$	110.00
8/22/2017	Wash DPPA	Swapp	Waiver of Service on Swapp case	$550.00	0.25	15.00	0.25	$	137.50
8/23/2017	Wash DPPA	Swapp	Waiver of Service on Swapp case	$550.00	0.25	15.00	0.25	$	137.50
8/28/2017	Wash DPPA	Swapp	E-mail to co-counsel about lead plaintiff on other defendants	$550.00	0.20	12.00	0.20	$	110.00
9/6/2017	Wash DPPA	Swapp	Organizing possible class representatives, e-mails, and contacting several attorneys by e-mail	$550.00	0.70	42.00	0.70	$	385.00
10/20/2017	Wash DPPA	Swapp	Swapp Mtn. to Dismiss	$550.00	0.75	45.00	0.75	$	412.50

10/23/2017	Wash DPPA	Swapp	"Knowledge" Defense and Conference Call, Declarations from WSP, Identification of Ex. H and I as Knowledge to Tom K	$550.00	2.50	150.00	2.50	$ 1,375.00
1/31/2018	Wash DPPA	Swapp	Review of Kizzy memo on status and identification of lead plaintiff	$550.00	0.20	12.00	0.20	$ 110.00
1/31/2018	Wash DPPA	Swapp	Meeting with attorney on discovery issues, plan for certification, and identification of lead plaintiff who have contacted us in the past	$550.00	1.30	78.00	1.30	$ 715.00
3/23/2018	Wash DPPA	Swapp	E-mail to Kizzie, Co counsel, Terry Lumsden office about police report numbers. We will check against the WSP discovery	$550.00	0.40	24.00	0.40	$ 220.00
4/6/2018	Wash DPPA	Swapp	Review of Int. resp. letter, and docs producede	$550.00	0.50	30.00	0.50	$ 275.00
4/18/2018	Wash DPPA	Swapp	Review of discovery dispute on interrogatories and requests for production	$550.00	0.20	12.00	0.20	$ 110.00
5/9/2018	Wash DPPA	Swapp	rc'd redlined second amended answer and affirmative defenses.	$550.00	0.50	30.00	0.50	$ 275.00
5/11/2018	Wash DPPA	Swapp	Review of discovery dispute involving Jim Sweetser as a possible witness to Craig Swapp's conduct or knowledge. Responded to attorney's that I am not a witness, and my motive is not relevant to any of the issues of whether there was a violation of the DPPA.	$550.00	0.60	36.00	0.60	$ 330.00
5/22/2018	Wash DPPA	Swapp	Review of subpoena from Swapp	$550.00	0.50	30.00	0.50	$ 275.00
5/23/2018	Wash DPPA	Swapp	Reviewed Plaintiff Resp. to D's 1st set of Interrogatories	$550.00	0.50	30.00	0.50	$ 275.00
5/25/2018	Wash DPPA	Swapp	E-mail to co-counsel on motion to quash subpoena and best approach when information is not admissible or reasonably calculated to lead to admissible evidence. Discussion with Marcus Sweetser on issues. Discussion with Tom Jarrard on issues.	$550.00	1.20	72.00	1.20	$ 660.00
5/29/2018	Wash DPPA	Swapp	E-mail to co-counsel on motion to quash subpoena and best approach when information is not admissible or reasonably calculated to lead to admissible evidence. Discussion with Marcus Sweetser on issues. Discussion with Tom Jarrard on issues.	$550.00	0.20	12.00	0.20	$ 110.00
5/30/2018	Wash DPPA	Swapp	E-mail to the list serve on subpoena for WASJ electronic e-mails	$550.00	0.50	30.00	0.50	$ 275.00
5/30/2018	Wash DPPA	Swapp	Telephone call with WASJ legal counsel	$550.00	0.20	12.00	0.20	$ 110.00
5/31/2018	Wash DPPA	Swapp	E-mails with list serve on RFP	$550.00	0.50	30.00	0.50	$ 275.00
5/31/2018	Wash DPPA	Swapp	Preservation of e-mails and search terms	$550.00	2.00	120.00	2.00	$ 1,100.00
5/31/2018	Wash DPPA	Swapp	Emails to Marcus	$550.00	0.10	6.00	0.10	$ 55.00
6/1/2018	Wash DPPA	Swapp	Preservation of e-mails and search terms	$550.00	1.50	90.00	1.50	$ 825.00
6/4/2018	Wash DPPA	Swapp	Review of objections to subpoena, and meeting with Tom Jarrard. Decision to hire Mike Love.	$550.00	0.80	48.00	0.80	$ 440.00
6/7/2018	Wash DPPA	Swapp	reviewed resp. to Plaintiffs 1st RFA	$550.00	0.10	6.00	0.10	$ 55.00

6/15/2018	Wash DPPA	Swapp	Retainer Mike Love	$550.00	0.50	30.00	0.50	$	275.00
6/15/2018	Wash DPPA	Swapp	Review of discovery and meeting with Kizzie	$550.00	0.50	30.00	0.50	$	275.00
6/18/2018	Wash DPPA	Swapp	Review of final discovery and editing	$550.00	0.60	36.00	0.60	$	330.00
6/19/2018	Wash DPPA	Swapp	Review of Mike Love and Tom Jarrard's objections for final, e-mail concerns	$550.00	0.30	18.00	0.30	$	165.00
6/20/2018	Wash DPPA	Swapp	Reviewed Plaintiff Resp. to Discovery for final	$550.00	1.00	60.00	1.00	$	550.00
6/25/2018	Wash DPPA	Swapp	Email to Scott McDonald re DPPA claims	$550.00	0.10	6.00	0.10	$	55.00
7/10/2018	Wash DPPA	Swapp	Review Mediation Offer	$550.00	0.25	15.00	0.25	$	137.50
8/2/2018	Wash DPPA	Swapp	Review of Proposed Amended Complain from Kirchofer	$550.00	0.25	15.00	0.25	$	137.50
8/28/2018	Wash DPPA	Swapp	Review Declaration and revise	$550.00	0.40	24.00	0.40	$	220.00
8/30/2018	Wash DPPA	Swapp	Reviewed Amended Complaint	$550.00	1.50	90.00	1.50	$	825.00
9/11/2018	Wash DPPA	Swapp	Received and reviewed motion to compel subpoena and also e-mails to Mike Love, Tom Jarrard, Marcus Sweetser	$550.00	1.20	72.00	1.20	$	660.00
9/24/2018	Wash DPPA	Swapp	Edit of declaration and response to motion to compel and motion for protective order.	$550.00	1.50	90.00	1.50	$	825.00
10/1/2018	Wash DPPA	Swapp	Review and revision to defense motion for summary judgment	$550.00	1.20	72.00	1.20	$	660.00
10/15/2018	Wash DPPA	Swapp	Email regarding contact former swapp employees	$550.00	0.10	6.00	0.10	$	55.00
10/30/2018	Wash DPPA	Swapp	Review and comment for our reply to defendant's response to certification	$550.00	2.20	132.00	2.20	$	1,210.00
10/31/2018	Wash DPPA	Swapp	Meeting with Marcus on main points	$550.00	0.80	48.00	0.80	$	440.00
11/7/2018	Wash DPPA	Swapp	reviewed reply to mot. To certify and sent email	$550.00	1.00	60.00	1.00	$	550.00
11/14/2018	Wash DPPA	Swapp	Review and revisions of reply brief on motion to certify the class action	$550.00	1.20	72.00	1.20	$	660.00
11/30/2018	Wash DPPA	Swapp	Response to Defendant's request for oral argument on class certification	$550.00	0.60	36.00	0.60	$	330.00
12/6/2018	Wash DPPA	Swapp	email to mike love	$550.00	0.10	6.00	0.10	$	55.00
12/7/2018	Wash DPPA	Swapp	email wsaj re sdt	$550.00	0.10	6.00	0.10	$	55.00
12/17/2018	Wash DPPA	Swapp	email to wsaj re dppa claims	$550.00	0.10	6.00	0.10	$	55.00
1/24/2019	Wash DPPA	Swapp	Review of document 108 denying Defendant's Motion to Dismiss for Failure to State a Cause of Action	$550.00	0.50	30.00	0.50	$	275.00
1/29/2019	Wash DPPA	Swapp	Phone conversation with Kristian Beckett, e-mails, review of Swapp deposition	$550.00	3.00	180.00	3.00	$	1,650.00
1/30/2019	Wash DPPA	Swapp	E-mails, call to Inlander, e-mail to Eagles	$550.00	1.50	90.00	1.50	$	825.00
1/30/2019	Wash DPPA	Swapp	E-mail to Khristian Beckett with witness disclosure and review of marketing manager depositoin	$550.00	1.00	60.00	1.00	$	550.00
1/31/2019	Wash DPPA	Swapp	Memo on phone conversation with Khristian Beckett and e-mail to co-counsel	$550.00	1.00	60.00	1.00	$	550.00
2/4/2019	Wash DPPA	Swapp	email from barton to go full steam on investigation of potential witnesses	$550.00	0.20	12.00	0.20	$	110.00
2/18/2019	Wash DPPA	Swapp	Review of court orders, stay, mediation, witness investigation, e-mails, sent emails to Joe, Tom and Marcus	$550.00	1.80	108.00	1.80	$	990.00

TOTALS:	**173.85**	10,431.00	173.85	**95,617.50**

Exhibit B

Date	Client	Project	Description of Work	Rate/Unit Price	Labor Time/ Quantity	In Minutes	Billable Time/ Cost Price	TOTAL Bill Amt /Sell Price	BILL AMOUNT SWAPP
11/1/2017	Wash DPPA	Swapp	Review and Comment on Tom K opp'n to Dismiss motion, phone call, emails	$375.00	1.50	90.00	1.50	$ 562.50	$ 562.50
11/2/2017	Wash DPPA	Swapp	Review and Comment Tom K opp'n to Dismiss motion, phone call, emails	$375.00	1.25	75.00	1.25	$ 468.75	$ 468.75
11/13/2017	Wash DPPA	Swapp	Review Swapp Mtn To Dismiss Opp	$375.00	0.50	30.00	0.50	$ 187.50	$ 187.50
11/15/2017	Wash DPPA	Swapp	Outline Points re: Swapp Oral Argument	$375.00	0.50	30.00	0.50	$ 187.50	$ 187.50
1/9/2018	Wash DPPA	Swapp	Scheduling Conference call w/ Barton	$375.00	0.20	12.00	0.20	$ 75.00	$ 75.00
1/9/2018	Wash DPPA	Swapp	Overview of Multiple Requesters Spreadsheet	$375.00	3.50	210.00	3.50	$ 1,312.50	$ 1,312.50
1/10/2018	Wash DPPA	Swapp	Analyzing Requesters Spreadsheet from WSP, supplemental spreadsheets, correlating data	$375.00	7.50	450.00	7.50	$ 2,812.50	$ 2,812.50
1/10/2018	Wash DPPA	Swapp	Review JSR Swapp	$375.00	0.20	12.00	0.20	$ 75.00	$ 75.00
1/10/2018	Wash DPPA	Swapp	Emails re: Discovery Plan & Joint Status Conference	$375.00	0.20	12.00	0.20	$ 75.00	$ 75.00
1/11/2018	Wash DPPA	Swapp	Emails re: Discovery Plan & Joint Status Conference	$375.00	0.10	6.00	0.10	$ 37.50	$ 37.50
1/12/2018	Wash DPPA	Swapp	Emails re: Discovery Plan & Joint Status Conference	$375.00	0.10	6.00	0.10	$ 37.50	$ 37.50
1/15/2018	Wash DPPA	Swapp	26(f) Disclosures JSR Reports Swapp	$375.00	0.75	45.00	0.75	$ 281.25	$ 281.25
1/18/2018	Wash DPPA	Swapp	Review Order denying certification to Wa. Supreme Court	$375.00	0.75	45.00	0.75	$ 281.25	$ 281.25
1/18/2018	Wash DPPA	Swapp	Emails re: Discovery Plan & Joint Status Conference	$375.00	0.10	6.00	0.10	$ 37.50	$ 37.50
1/19/2018	Wash DPPA	Swapp	Drafted Swapp Draft Document Production Requests	$375.00	0.50	30.00	0.50	$ 187.50	$ 187.50
1/22/2018	Wash DPPA	Swapp	Reviewed Stip. To Defense counsel re: 26(f)	$375.00	0.25	15.00	0.25	$ 93.75	$ 93.75
1/22/2018	Wash DPPA	Swapp	Reviewed Swapp Draft Document Requests	$375.00	0.25	15.00	0.25	$ 93.75	$ 93.75
1/24/2018	Wash DPPA	Swapp	Emails re: Discovery Plan & Joint Status Conference	$375.00	0.10	6.00	0.10	$ 37.50	$ 37.50
1/29/2018	Wash DPPA	Swapp	Locating and Providing Ex. D to Tom K	$375.00	0.50	30.00	0.50	$ 187.50	$ 187.50
1/29/2018	Wash DPPA	Swapp	Meeting w/ Tom Jarrard	$375.00	0.50	30.00	0.50	$ 187.50	$ 187.50
1/31/2018	Wash DPPA	Swapp	Review Swapp Draft Document Requests	$375.00	0.25	15.00	0.25	$ 93.75	$ 93.75
1/31/2018	Wash DPPA	Swapp	Gathering docs for Tom K	$375.00	2.00	120.00	2.00	$ 750.00	$ 750.00
2/1/2018	Wash DPPA	Swapp	Initial discl. To Swapp reviewed	$375.00	0.50	30.00	0.50	$ 187.50	$ 187.50
2/1/2018	Wash DPPA	Swapp	Swapp Rule 36 Discloures	$375.00	0.25	15.00	0.25	$ 93.75	$ 93.75
2/2/2018	Wash DPPA	Swapp	Emails re: Discovery Plan & Joint Status Conference	$375.00	0.25	15.00	0.25	$ 93.75	$ 93.75
2/2/2018	Wash DPPA	Swapp	Reviewed Swapp Draft Document Requests	$375.00	0.50	30.00	0.50	$ 187.50	$ 187.50
2/2/2018	Wash DPPA	Swapp	Swapp Rule 36 Discloures	$375.00	0.50	30.00	0.50	$ 187.50	$ 187.50
2/5/2018	Wash DPPA	Swapp	Swapp Rule 36 Discloures	$375.00	0.50	30.00	0.50	$ 187.50	$ 187.50
2/5/2018	Wash DPPA	Swapp	Sharing dropbox & zip files to Barton	$375.00	1.50	90.00	1.50	$ 562.50	$ 562.50
2/5/2018	Wash DPPA	Swapp	Identified Swapp former client list inaccuracies	$375.00	1.25	75.00	1.25	$ 468.75	$ 468.75
2/5/2018	Wash DPPA	Swapp	Discussed Private investigator for Swapp former employees	$375.00	1.00	60.00	1.00	$ 375.00	$ 375.00
2/12/2018	Wash DPPA	Swapp	Review initial disclosures to Swapp	$375.00	0.25	15.00	0.25	$ 93.75	$ 93.75
2/12/2018	Wash DPPA	Swapp	Oral Argument scheduling	$375.00	0.25	15.00	0.25	$ 93.75	$ 93.75
2/12/2018	Wash DPPA	Swapp	Review Swapp Protective Order	$375.00	0.50	30.00	0.50	$ 187.50	$ 187.50
2/13/2018	Wash DPPA	Swapp	Oral Argument scheduling	$375.00	0.10	6.00	0.10	$ 37.50	$ 37.50
2/13/2018	Wash DPPA	Swapp	Emails re: Swapp Protective Order	$375.00	0.70	42.00	0.10	$ 262.50	$ 37.50

2/27/2018	Wash DPPA	Swapp	Emails re: Extension of Discovery	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
3/2/2018	Wash DPPA	Swapp	Emails re: Extension of Discovery	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
3/6/2018	Wash DPPA	Swapp	Initial discl. from Swapp reviewed requests	$375.00	0.75	45.00	0.75	$	281.25	$ 281.25
3/7/2018	Wash DPPA	Swapp	Review of defendant's initial discovery request	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
3/7/2018	Wash DPPA	Swapp	Tom K answer re: redacted vs unredacted reports	$375.00	0.75	45.00	0.75	$	281.25	$ 281.25
3/8/2018	Wash DPPA	Swapp	Initial discl. to Swapp reviewed requests	$375.00	0.50	30.00	0.50	$	187.50	$ 187.50
3/14/2018	Wash DPPA	Swapp	Protective Order Draft review	$375.00	0.30	18.00	0.30	$	112.50	$ 112.50
3/14/2018	Wash DPPA	Swapp	Drafted Swapp ESI Search Terms	$375.00	0.50	30.00	0.50	$	187.50	$ 187.50
3/15/2018	Wash DPPA	Swapp	Scheduling Jade Wilcox to Speak w/ Tom K	$375.00	0.50	30.00	0.50	$	187.50	$ 187.50
3/19/2018	Wash DPPA	Swapp	Protective Order Finalization	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
3/21/2018	Wash DPPA	Swapp	Review Subpoena re: Sweetser	$375.00	0.50	30.00	0.50	$	187.50	$ 187.50
3/22/2018	Wash DPPA	Swapp	Email re: Subpoena re: Sweetser	$375.00	0.10	6.00	0.10	$	37.50	$ 37.50
3/22/2018	Wash DPPA	Swapp	NOA filed	$375.00	0.10	6.00	0.10	$	37.50	$ 37.50
3/29/2018	Wash DPPA	Swapp	Locating Ltr and Documents from Swapp Counsel	$375.00	0.50	30.00	0.50	$	187.50	$ 187.50
4/2/2018	Wash DPPA	Swapp	reviewed Defendants Letter re: Discovery	$375.00	0.20	12.00	0.20	$	75.00	$ 75.00
4/4/2018	Wash DPPA	Swapp	Call w/ Tom K	$375.00	0.75	45.00	0.75	$	281.25	$ 281.25
4/4/2018	Wash DPPA	Swapp	Emails: re: Defendants Letter re: Discovery	$375.00	0.20	12.00	0.20	$	75.00	$ 75.00
4/5/2018	Wash DPPA	Swapp	Review Plaintiff Resp. to First Disc	$375.00	0.50	30.00	0.50	$	187.50	$ 187.50
4/13/2018	Wash DPPA	Swapp	read Emails to Swapp Counsel	$375.00	0.10	6.00	0.10	$	37.50	$ 37.50
4/18/2018	Wash DPPA	Swapp	read Emails to Swapp Counsel	$375.00	0.10	6.00	0.10	$	37.50	$ 37.50
4/24/2018	Wash DPPA	Swapp	Ltr and Documents from Swapp Counsel	$375.00	0.30	18.00	0.30	$	112.50	$ 112.50
4/24/2018	Wash DPPA	Swapp	Locate docs re: Insurance and MVS Registration for Jade	$375.00	1.25	75.00	1.25	$	468.75	$ 468.75
4/24/2018	Wash DPPA	Swapp	Emailing Tom K Jade's Recorded Statement	$375.00	0.50	30.00	0.50	$	187.50	$ 187.50
4/26/2018	Wash DPPA	Swapp	Emails w/ Tom K re: gathering docs	$375.00	1.00	60.00	1.00	$	375.00	$ 375.00
5/3/2018	Wash DPPA	Swapp	Emails re: Status of Defendants Production of Documents	$375.00	0.20	12.00	0.20	$	75.00	$ 75.00
5/4/2018	Wash DPPA	Swapp	Emails re: Status of Defendants Production of Documents	$375.00	0.10	6.00	0.10	$	37.50	$ 37.50
5/7/2018	Wash DPPA	Swapp	Emails re: Status of Defendants Production of Documents	$375.00	0.20	12.00	0.20	$	75.00	$ 75.00
5/10/2018	Wash DPPA	Swapp	Emails re: Status of Defendants Production of Documents	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
5/11/2018	Wash DPPA	Swapp	Plaintiffs Discovery Requests Set One Drafted	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
5/16/2018	Wash DPPA	Swapp	Meeting re: Subpoena re: Sweetser	$375.00	2.00	120.00	2.00	$	750.00	$ 750.00
5/18/2018	Wash DPPA	Swapp	RE: service of the subpoena provided it is limited to 100	$375.00	0.50	30.00	0.50	$	187.50	$ 187.50
5/18/2018	Wash DPPA	Swapp	Letter and supplemental responses to Plaintiff's First Interrogatories	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
5/25/2018	Wash DPPA	Swapp	Meeting re: Defendants' Responses to Interrogatories 13-17	$375.00	0.50	30.00	0.50	$	187.50	$ 187.50
5/25/2018	Wash DPPA	Swapp	Draft. Mot. to Quash	$375.00	1.25	75.00	1.25	$	468.75	$ 468.75
5/29/2018	Wash DPPA	Swapp	Letter to Counsel 5.29.18	$375.00	0.20	12.00	0.20	$	75.00	$ 75.00
5/30/2018	Wash DPPA	Swapp	Reviewed re: Swapp Priviledge Log	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
5/30/2018	Wash DPPA	Swapp	WSAJ call regarding Subpoena of listserve emails	$375.00	0.50	30.00	0.50	$	187.50	$ 187.50
5/31/2018	Wash DPPA	Swapp	Draft Mot. to Quash Response	$375.00	6.25	375.00	5.00	$	2,343.75	$ 1,875.00
6/7/2018	Wash DPPA	Swapp	Letter to Counsel 6/7	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
6/8/2018	Wash DPPA	Swapp	Objections to Love re: Subpoena	$375.00	0.10	6.00	0.10	$	37.50	$ 37.50
6/11/2018	Wash DPPA	Swapp	Letter to Counsel 6/11	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75

6/11/2018	Wash DPPA	Swapp	Brief Review of Production of Collision Reports	$375.00	0.10	6.00	0.10	$	37.50	$ 37.50
6/12/2018	Wash DPPA	Swapp	Setting Locations of Depositions	$375.00	0.10	6.00	0.10	$	37.50	$ 37.50
6/14/2018	Wash DPPA	Swapp	Review Resp to Rogs	$375.00	0.75	45.00	0.75	$	281.25	$ 281.25
6/15/2018	Wash DPPA	Swapp	Love retainer for Subpoena	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
6/15/2018	Wash DPPA	Swapp	Wilcox et al. v. Swapp Depositions scheduling	$375.00	0.50	30.00	0.50	$	187.50	$ 187.50
6/19/2018	Wash DPPA	Swapp	WSAJ wrangling for Decs	$375.00	1.25	75.00	1.25	$	468.75	$ 468.75
6/26/2018	Wash DPPA	Swapp	Production of Collision Reports	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
6/26/2018	Wash DPPA	Swapp	Swapp Law et al. Ltr to Counsel	$375.00	0.10	6.00	0.10	$	37.50	$ 37.50
7/20/2018	Wash DPPA	Swapp	Ltr Counsel 7-20; Revised Privilege Log	$375.00	0.20	12.00	0.20	$	75.00	$ 75.00
7/31/2018	Wash DPPA	Swapp	Reply drafte Wilcox v. Swapp - reply	$375.00	0.50	30.00	0.50	$	187.50	$ 187.50
8/2/2018	Wash DPPA	Swapp	Swapp proposed amended complaint	$375.00	0.10	6.00	0.10	$	37.50	$ 37.50
8/7/2018	Wash DPPA	Swapp	Emails to co-counsel re Cert	$375.00	0.10	6.00	0.10	$	37.50	$ 37.50
8/14/2018	Wash DPPA	Swapp	Emails to co-counsel re Cert	$375.00	0.10	6.00	0.10	$	37.50	$ 37.50
8/15/2018	Wash DPPA	Swapp	Wilcox v. Swapp - Stipulation re: Amended Complaint	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
8/21/2018	Wash DPPA	Swapp	Class Cert Brief Edits	$375.00	2.00	120.00	2.00	$	750.00	$ 750.00
8/31/2018	Wash DPPA	Swapp	Third Supplemental Responses to Plaintiff's First Set of Interrogatories	$375.00	0.50	30.00	0.50	$	187.50	$ 187.50
9/11/2018	Wash DPPA	Swapp	Review and Memo on MOTION to Compel Compliance with Subpoena Served on James Sweetser	$375.00	2.00	120.00	2.00	$	750.00	$ 750.00
9/11/2018	Wash DPPA	Swapp	Draft Mot. for Protective Order	$375.00	2.00	120.00	2.00	$	750.00	$ 750.00
9/17/2018	Wash DPPA	Swapp	Memo re: Oral Argument on Motions to Dismiss & Class Certification	$375.00	3.25	195.00	3.25	$	1,218.75	$ 1,218.75
9/21/2018	Wash DPPA	Swapp	Review Request to WSAJ re: Disclosure of listserve docs	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
9/21/2018	Wash DPPA	Swapp	Draft Rebutall to Mike Love	$375.00	0.75	45.00	0.75	$	281.25	$ 281.25
9/21/2018	Wash DPPA	Swapp	Draft Mot. for Protective Order	$375.00	2.50	150.00	2.50	$	937.50	$ 937.50
9/24/2018	Wash DPPA	Swapp	Review Swapp 2nd Supp. Disclosures	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
9/25/2018	Wash DPPA	Swapp	Respond Draft of Request to WSAJ re: Disclosure of listserve docs	$375.00	0.50	30.00	0.50	$	187.50	$ 187.50
9/30/2018	Wash DPPA	Swapp	Draft Mot. to Quash Response	$375.00	5.00	300.00	5.00	$	1,875.00	$ 1,875.00
10/2/2018	Wash DPPA	Swapp	Review Swapp Reply re: Subpoena to Sweetser	$375.00	2.00	120.00	2.00	$	750.00	$ 750.00
10/25/2018	Wash DPPA	Swapp	Conversation with Private Investigaor & Kizzie	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
10/31/2018	Wash DPPA	Swapp	Barton conversation re: WSP Class Cert	$375.00	0.75	45.00	0.75	$	281.25	$ 281.25
11/9/2018	Wash DPPA	Swapp	Analyzing Requesters Spreadsheet from WSP, supplemental spreadsheets, correlating data	$375.00	2.50	150.00	2.50	$	937.50	$ 937.50
11/16/2018	Wash DPPA	Swapp	Declaration for Class Certification	$375.00	0.75	45.00	0.75	$	281.25	$ 281.25
11/20/2018	Wash DPPA	Swapp	Pulling Certain quotes from TRO hearing	$375.00	0.50	30.00	0.50	$	187.50	$ 187.50
11/30/2018	Wash DPPA	Swapp	Draft resp Mot. for Oral Argument	$375.00	1.75	105.00	1.75	$	656.25	$ 656.25
12/6/2018	Wash DPPA	Swapp	Review Order denying Swapp mot. to compel	$375.00	0.75	45.00	0.75	$	281.25	$ 281.25
12/21/2018	Wash DPPA	Swapp	Review indemnifying Swapp Insurance	$375.00	1.00	60.00	1.00	$	375.00	$ 375.00
1/30/2019	Wash DPPA	Swapp	Call from Kristian Beckett, private conversation about Swapp	$375.00	1.00	60.00	1.00	$	375.00	$ 375.00
2/6/2019	Wash DPPA	Swapp	Reviewed Swapp Valuation	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
2/7/2019	Wash DPPA	Swapp	Reviewed Swapp Mot. for Reconsideration	$375.00	1.00	60.00	1.00	$	375.00	$ 375.00

2/18/2019	Wash DPPA	Swapp								
			Reviewing docs from Old Swapp Malpratcie Case by Kritian Beckett	$375.00	6.50	390.00	6.50	$	2,437.50	$ 2,437.50
2/19/2019	Wash DPPA	Swapp	Emails re: Scheduling Conference	$375.00	0.50	30.00	0.50	$	187.50	$ 187.50
2/21/2019	Wash DPPA	Swapp	Email re: Jim King	$375.00	0.25	15.00	0.25	$	93.75	$ 93.75
4/30/2019	Wash DPPA	Swapp	Research Swapp Assets	$375.00	1.25	75.00	1.25	$	468.75	$ 468.75
			TOTALS:		**97.80**	**5,868.00**	**95.95**	**$**	**36,675.00**	**$ 35,981.25**

Exhibit B

DANIEL EIGLER TIME CARD

Date	Client	Project	Description of Work	Rate/Unit Price	Labor Time/ Quantity	In Minutes	Billable Time/ Cost Price	SWAPP BILL TOTAL
2/20/2019	Wash DPPA	Swapp	Meeting w/ Jim Update on Case Status	$300.00	1.00	60.00	1.00	$ 300.00
2/20/2019	Wash DPPA	Swapp	Deposition review and Deposition summary re: Swapp prior malpractice case	$300.00	1.70	102.00	1.70	$ 510.00
			TOTALS		2.70	162.00	2.70	**810.00**

Exhibit D

KIZZIE JOHNSON TIME

Date	Client	Project	Description of Work	Rate/Unit Price	Labor Time/ Quantity	In Minutes	Billable Time/ Cost Price for Swapp	Total Billable Amount	SWAPP BILL
3/31/2015	WASH Dppa	SWAPP	Grievance Against Swapp discussion with Jim	$200.00	0.50	30.00	0.5	$ 100.00	$ 100.00
5/4/2015	WASH Dppa	SWAPP	Reviewed Swapp 4/28/15 Response Letter to WSBA	$200.00	0.25	15.00	0.25	$ 50.00	$ 50.00
5/4/2015	WASH Dppa	SWAPP	Review PDR from Attorney General Office re swapp Pg JRS 00001--85 discussed w/ Jim	$200.00	1.50	90.00	1.5	$ 300.00	$ 300.00
5/4/2015	WASH Dppa	SWAPP	Review PDR from Attorney General Office re swapp Pg JRS 00001--85	$200.00	1.00	60.00	1	$ 200.00	$ 200.00
5/8/2015	WASH Dppa	SWAPP	Letter to Felice Congalton WSBA Reply	$200.00	0.25	15.00	0.25	$ 50.00	$ 50.00
6/22/2015	WASH Dppa	SWAPP	Reviewed, formatted, Letter to Powell Reply to Swapp Resp. 6/5/15 and 6/17/15 letter from Powell	$200.00	0.25	15.00	0.25	$ 50.00	$ 50.00
7/11/2015	WASH Dppa	SWAPP	Reviewed Swapp 6/5/15 Resp. to Office of Disciplinary Counsel	$200.00	0.25	15.00	0.25	$ 50.00	$ 50.00
7/31/2015	WASH Dppa	SWAPP	reviewed, formatted, Letter to Powell Additional evidence f/u investigation progression	$200.00	0.10	6.00	0.1	$ 20.00	$ 20.00
8/31/2015	WASH Dppa	SWAPP	reviewed WSBA 8/28/15 letter and Swapp 8/24/15 Letter and Ex. A	$200.00	1.00	60.00	1	$ 200.00	$ 200.00
9/4/2015	WASH Dppa	SWAPP	Reviewed, formatted, and discussed w/ Jim Final Reply to Swapp Resp. to Grievance	$200.00	1.00	60.00	1	$ 200.00	$ 200.00
10/28/2015	WASH Dppa	SWAPP	Reviewed, formatted, Letter to Powell Requesting update on investigation and providing additional evidence	$200.00	0.10	6.00	0.1	$ 20.00	$ 20.00
3/28/2016	WASH Dppa	SWAPP	Reviewed WSBA Response-via Powell dated 3/24/16 Findings with attached 9/28/15 Swapp Letter and Powell 7/30/15 grievance investigation letter	$200.00	1.00	60.00	1	$ 200.00	$ 200.00
3/28/2016	WASH Dppa	SWAPP	Reviewed Craig Swapp Letter to WSBA dated 9/28/15	$200.00	0.25	15.00	0.25	$ 50.00	$ 50.00
3/30/2016	WASH Dppa	SWAPP	Reviewed, formatted, etc. Letter to Doug Ende Office Disciplinary Counsel WSBA - Challenge to Review Committtee	$200.00	1.00	60.00	1	$ 200.00	$ 200.00
4/25/2016	WASH Dppa	SWAPP	Reviewed, formatted, revised Letter to Christine Gray WSBA- f/u Reopening bar complaint	$200.00	0.25	15.00	0.25	$ 50.00	$ 50.00
5/1/2016	WASH Dppa	SWAPP	Reviewed, formatted, discussed w/ jim Ethics Board ReOpening final Version Letter	$200.00	1.00	60.00	1	$ 200.00	$ 200.00
6/6/2016	WASH Dppa	SWAPP	Reviewed WSBA 5/27/16 Decision on Grievance, discussed w/ Jim	$200.00	1.00	60.00	1	$ 200.00	$ 200.00
6/6/2016	WASH Dppa	SWAPP	reviewed, formatted, Appeal to Greievance Against Swapp	$200.00	0.10	6.00	0.1	$ 20.00	$ 20.00
9/1/2016	WASH Dppa	SWAPP	Revoewed Letter to Christine Gray WSBA DPPA additional Information	$200.00	0.25	15.00	0.25	$ 50.00	$ 50.00
7/25/2017	WASH Dppa	SWAPP	roughdraft fee agreement w/ client and firms sent to joe, kirschofer, jarrard, blockesq	$200.00	0.25	15.00	0.25	$ 50.00	$ 50.00
8/4/2017	WASH Dppa	SWAPP	finalizing fee agreement, mulitple emails, etc.	$200.00	0.50	30.00	0.5	$ 100.00	$ 100.00

8/4/2017	WASH Dppa	SWAPP	draft complaint, reviewed, multiple emails, revisions, etc.	$200.00	1.00	60.00	1	$	200.00	$	200.00
8/5/2017	WASH Dppa	SWAPP	draft complaint, multiple emails, etc.	$200.00	0.50	30.00	0.5	$	100.00	$	100.00
8/6/2017	WASH Dppa	SWAPP	draft complaint, multiple emails, etc.	$200.00	0.50	30.00	0.5	$	100.00	$	100.00
8/7/2017	WASH Dppa	SWAPP	more changes to complaint, emails etc.	$200.00	1.00	60.00	1	$	200.00	$	200.00
8/7/2017	WASH Dppa	SWAPP	found 2015 police report and confirmed swapp ordered both 2016, and 2015 reports and hendrix 2014 and provided police report #s to tom reviewed info cam ein, gave availability to co-counsel updated memo and gave to Tom	$200.00	1.50	90.00	1.5	$	300.00	$	300.00
8/9/2017	WASH Dppa	SWAPP	Wilcox v. Swapp- attempted to file swap----saying fee waived and missed location to add attorneys cannot go back I need to contact clerks office to see what I need to do in a.m. will file 1st thing tomorrow….obviously have not filed enough new cases with multiple attorneys on cases. multiple emails	$200.00	1.25	75.00	1.25	$	250.00	$	250.00
8/10/2017	WASH Dppa	SWAPP	called clerk's office regarding filing figured it out and will put it through sent via email	$200.00	0.50	30.00	0.5	$	100.00	$	100.00
8/10/2017	WASH Dppa	SWAPP	multiple emails re compalint	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
8/10/2017	WASH Dppa	SWAPP	downloaded complaint summons,	$200.00	0.50	30.00	0.5	$	100.00	$	100.00
8/11/2017	WASH Dppa	SWAPP	set up service for swapp with arlan, telephone call,	$200.00	1.00	60.00	1	$	200.00	$	200.00
8/14/2017	WASH Dppa	SWAPP	multiple emails regarding email from swapp	$200.00	0.50	30.00	0.5	$	100.00	$	100.00
8/15/2017	WASH Dppa	SWAPP	copy of complaint and summons to Kirschofer and barton	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
8/15/2017	WASH Dppa	SWAPP	multiple emails from folks regarding letters and emails	$200.00	0.50	30.00	0.5	$	100.00	$	100.00
8/22/2017	WASH Dppa	SWAPP	proof of service on swapp sent w/ email	$200.00	0.50	30.00	0.5	$	100.00	$	100.00
8/22/2017	WASH Dppa	SWAPP	drafted Waiver of service	$200.00	1.00	60.00	1	$	200.00	$	200.00
8/25/2017	WASH Dppa	SWAPP	filed waivers of service jscwapp; filed waiver of service swapp law…this had wrong case # and liz will file praecipe once we receive signed document	$200.00	1.00	60.00	1	$	200.00	$	200.00
1/26/2018	WASH Dppa	SWAPP	sent multiple emails regarding meeting	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
2/1/2018	WASH Dppa	SWAPP	put documents requested for depo together. Sent email to Kirchofer asking for any additional task	$200.00	2.25	135.00	2.25	$	450.00	$	450.00
2/2/2018	WASH Dppa	SWAPP	sent info. Over for disc. Resp. reg kathleeen britt.	$200.00	0.50	30.00	0.5	$	100.00	$	100.00
2/5/2018	WASH Dppa	SWAPP	created and shared Wilcox v. Swapp Docs to burton, ming, liz, etc.	$200.00	1.00	60.00	1	$	200.00	$	200.00
2/8/2018	WASH Dppa	SWAPP	review of records and email to attorneys regarding pausible clients/attorney for DPPA claims against offices ordering PTCRs	$200.00	1.25	75.00	1.25	$	250.00	$	250.00
2/20/2018	WASH Dppa	SWAPP	reviewed draft PDRs from Dan and Marcus, gave them insight for revisions	$200.00	0.75	45.00	0.75	$	150.00	$	150.00
3/15/2018	WASH Dppa	SWAPP	uploaded docs from batise to Wilcox v. Swapp …..having issues confirmed each doc uploaded and uploaded missing files	$200.00	1.50	90.00	1.5	$	300.00	$	300.00
3/15/2018	WASH Dppa	SWAPP	worked w/ kirchofer to get jade interogs and schedule meeting	$200.00	0.25	15.00	0.25	$	50.00	$	50.00

3/16/2018	WASH Dppa	SWAPP	helped look into docs for disc. Resp.	$200.00	1.00	60.00	1	$	200.00	$	200.00
3/23/2018	WASH Dppa	SWAPP	Ran search on possible plaintiffs through multiple requestor spreadsheet and provided information to Jim, jarrard, kirchofer, barton and Sweetser	$200.00	0.75	45.00	0.75	$	150.00	$	150.00
3/26/2018	WASH Dppa	SWAPP	drafted NOA for marcus	$200.00	0.50	30.00	0.5	$	100.00	$	100.00
3/27/2018	WASH Dppa	SWAPP	Called on policy for wilcox received info and sent to attorney	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
3/29/2018	WASH Dppa	SWAPP	contacted jade for interog resp. and provided responses to tom	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
4/27/2018	WASH Dppa	SWAPP	uploaded Bate Stamp docs file to drop box	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
5/2/2018	WASH Dppa	swapp	email to tom re: batiste disc.	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
5/4/2018	WASH Dppa	SWAPP	email and review of disc. In drop box / correspondence w/ ming	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
5/23/2018	WASH Dppa	SWAPP	called statefarm, called jade, email to Tom Kirschofer, et all regarding findings and disc. Resp.	$200.00	0.75	45.00	0.75	$	150.00	$	150.00
5/23/2018	WASH Dppa	SWAPP	received and reviewed notes from statefarm and sent to tom k., et al	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
5/24/2018	WASH Dppa	Swapp	ck'd file for driver's license only have front; contacted client she will see if she has older driver's license sent me photos of current license front and back; contacted insurance carrier for statement and policy, sent notes on statement but not recorded statement, will send policy, multiple emails with Tom Kirchofer	$200.00	1.50	90.00	1.5	$	300.00	$	300.00
5/30/2018	WASH Dppa	SWAPP	worked w/ jade to get copy of drivers license and sent to attorneys	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
6/4/2018	WASH Dppa	SWAPP	reviewed, reformatted etc. Sweetser NonParty Objection to SDT	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
6/4/2018	WASH Dppa	SWAPP	added file dropbox AG PDRS	$200.00	0.08	4.80	0.08	$	16.00	$	16.00
6/4/2018	WASH Dppa	Swapp	worked w/ jade to schedule depositions/test	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
6/5/2018	WASH Dppa	SWAPP	uploaded add. Docs (AG PDR) in drop box and sent email to ming	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
6/15/2018	WASH Dppa	SWAPP	added RFPs 6-12-18 to drop box	$200.00	0.08	4.80	0.08	$	16.00	$	16.00
6/15/2018	WASH Dppa	SWAPP	spoke w/ ming regarding documents Joe needs for depositions; found documents, printed; contacted Jade to let her know I need her to review Batiste responses and to give her documents for swapp case. Asked jarrad and ming for copies of frcp26 initial disclosures which we did not have in the file.	$200.00	1.50	90.00	1.5	$	300.00	$	300.00
6/15/2018	WASH Dppa	SWAPP	Sent information to Mike Love for response to subpoena	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
6/20/2018	WASH Dppa	SWAPP	put binder together for Burton and had Joe deliver to motel	$200.00	1.00	60.00	1	$	200.00	$	200.00
6/27/2018	WASH Dppa	SWAPP	Emails from Jarrard and Kirchofer	$200.00	0.08	4.80	0.08	$	16.00	$	16.00

6/27/2018	WASH Dppa	SWAPP	Downloaded, printed, and reviewed Plaintiff's reply to Motion to compel	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
7/16/2018	WASH Dppa	SWAPP	spoke w/ jarrard...confirmed Wilcox reviewed deposition and where they wanted original info. To go.	$200.00	0.17	10.20	0.17	$	34.00	$	34.00
7/18/2018	WASH Dppa	SWAPP	downloaded, printed, saved and quick review of Def. Resp. to mot. To compel	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
7/31/2018	WASH Dppa	SWAPP	uploaded all supp from Batiste in july to drop box for Ming and sent ming a message and let her know where 70090272-D_70090404 were located in drop box file…i.e. 6-12-18 RFPs Produced	$200.00	0.50	30.00	0.5	$	100.00	$	100.00
7/31/2018	WASH Dppa	SWAPP	downloaded, printed, saved and quick reviewed Plaintiff's reply to 2nd Mot to compel and exhibits	$200.00	0.25	15.00	0.25	$	50.00	$	50.00
8/9/2018	WASH Dppa	SWAPP	downloaded all plaintiff's documents and reviewed what missing	$200.00	2.00	120.00	2	$	400.00	$	400.00
8/28/2018	WASH Dppa	SWAPP	reviewed filing noted Ex. 6 not incorporated in filings but noted as an exhibit…filed exhibit	$200.00	1.00	60.00	1	$	200.00	$	200.00
9/21/2018	WASH Dppa	SWAPP	reviewed and found dates for Michael Love and sent email	$200.00	0.50	30.00	0.5	$	100.00	$	100.00
9/26/2018	WASH Dppa	SWAPP	reviewed prior to disc. And finalized	$200.00	0.50	30.00	0.5	$	100.00	$	100.00
9/28/2018	WASH Dppa	SWAPP	finalized and sent discovery out	$200.00	1.25	75.00	1.25	$	250.00	$	250.00
2/1/2019	WASH Dppa	SWAPP	Emails regarding addresses for swapp requests	$200.00	0.10	6.00	0.1	$	20.00	$	20.00
2/4/2019	WASH Dppa	SWAPP	downloaded docs filed - going to file docs for tom he filed ck'd out possible plaintiffs	$200.00	1.00	60.00	1	$	200.00	$	200.00
9/20/2019	WASH Dppa	SWAPP	Spoke w/ Ming. They need the excel files that we need to merge to get swapp class action plaintiff list…searched discovery to find dcouments. Liz helped	$200.00	1.50	90.00	1.5	$	300.00	$	300.00
9/24/2019	WASH Dppa	SWAPP	spoke w/ Dee regarding VLookUp and running through Excel program. Told her what we needed and she said she would look at it and see what she could do	$200.00	0.50	30.00	0.5	$	100.00	$	100.00
9/25/2019	WASH Dppa	SWAPP	sent the excel file dee created to Ming and Collins	$200.00	0.15	9.00	0.15	$	30.00	$	30.00
9/26/2019	WASH Dppa	SWAPP	went through excel file Swapp Matches, deleted duplicate entries, search inc., city, state, corp, company, llc and pulled them out of the final list of class action plaintiffs…pulled some w/ typos. I am not sure how to pull w/out pulling all docs. Sent to Ming and Collin	$200.00	3.50	210.00	3.5	$	700.00	$	700.00
9/30/2019	WASH Dppa	SWAPP	email to marcus on detail into excel file-	$200.00	0.50	30.00	0.5	$	100.00	$	100.00
10/3/2019	WASH Dppa	SWAPP	meeting w/ dee on thoughts to eliminate duplicates…she came up with something started reviewing	$200.00	1.50	90.00	1.5	$	300.00	$	300.00

10/16/2019	WASH Dppa	SWAPP	Reviewing the duplicates and putting together 2nd sheet to show needed impute-deleted all duplicates could reasonably deduct were duplicates. Need impute on entries w/ Jr. sr. III, etc; different last name-same first name and same address; entries with names similar address same-could be husband and wife, i.e. Don and Donna-or could be misentry.	$200.00	5.00	300.00	5	$ 1,000.00	$ 1,000.00
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			TOTAL		**61.71**	**3,702.60**	**61.71**	**$ 12,342.00**	**$ 12,342.00**