

Francis of Sultzer & Lipari, PLLC, Michael Reese of Reese LLP, Nick Suciu of Milberg Coleman Bryson Phillips Grossman, PLLC, Charles Schaffer of Levin Sedran & Berman LLP, Jeffrey K. Brown of Leeds Brown Law, P.C., and Paul Doolittle of Poulin, Willey, Anastopoulo, LLC. (collectively, “Class Counsel”). *Id.*

4. The proposed class action Settlement would resolve the economic claims of purchasers of Defendant Boar’s Head’s food products (the “Covered Products”) for a non-reversionary common fund in the amount of \$3,100,000. (“Settlement Fund”). Class Counsel achieved this proposed Settlement because of their experience in cases like this and because they invested considerable time, effort, and resources into prosecuting this case. By any measure, Class Counsels’ efforts have been an unqualified success, and the Class Members have responded in kind, with approximately 66,000 Valid Claims submitted, zero objections, and only three valid requests for exclusion.

5. The Settlement Agreement provides that Defendant will establish a Settlement Fund in the amount of \$3.1 million, which will be exhausted to pay all Valid Claims, as well as any attorneys’ fees and costs, service awards, and notice and other administrative costs that are approved by the Court. §1.32. Class Members who submit a Valid Claim that is not accompanied by Proof of Purchase shall receive the total of the average retail price for up to two (2) Covered Products claimed per household, with Boar’s Head to provide sufficient data to show the average retail prices of the Covered Products. §4.4.2. Class Members who submit a Valid Claim that is accompanied by Proof of Purchase of a Class Product shall be entitled to receive a full refund of the amount of money he or she spent on the Class Products that is documented by Proof of Purchase, inclusive of taxes. §4.4.1. If a Settlement Class Member or any person in that Settlement Class Member’s Household received Recall Reimbursement from Defendant, as reflected on the Settlement Class Member’s Claim Form or in the records of Defendant, the

amount of that Settlement Class Member's payment shall be reduced by the amount of Recall Reimbursement that Settlement Class Member or persons in that Settlement Class Member's Household have received (provided that the payment shall not be reduced below \$0.00). §4.4.3. Each Settlement Class Member's payment shall be increased or decreased on a *pro rata* basis such that the total amount paid to all Settlement Class Members equals the Available Settlement Funds. §4.4.4.

6. The Settlement achieved by Class Counsel benefits Class Members in a number of ways.

7. First, besides putting money directly in their pockets, it has significantly expanded the scope of Defendant's recall/refund program. Under the terms of the Settlement, Class Members with proof of purchase receive the full purchase price of the Products they bought. Class Members without proof of purchase receive the average price of the Products for up to two products. This is compensation that was not available through Defendant's recall of the Products at issue in the litigation, which required proof of purchase in order to receive reimbursement under certain circumstances.

8. Moreover, the average estimated recovery for Class Members who made claims is significant and is greater than the average price of the Products, which is approximately \$9.75. Those that submitted a Valid Claim, with Proof of Purchase, will receive an estimated \$58.61, while the average estimated recovery for those who submitted a Valid Claim without Proof of Purchase, is \$27.73.

9. In addition, the comprehensive notice plan initiated by Class Counsel expanded on and reached a far greater number of consumers, resulting in approximately 66,000 Valid Claims thus far, compared to the approximately \$394,000 in refunds distributed by Boar's Head as part of the Recall.

10. Second, the settlement benefits the entire Class as a whole, whether class members submitted a claim or not, by providing a high percentage of the total possible recovery in this litigation in the event the case was successfully tried to conclusion. Defendant estimates that the total value of the Covered Products that reached consumers was approximately \$10-11 million, meaning that the \$3.1 million settlement fund is between 28% and 31% of damages under a total disgorgement theory. This alone is a very significant outcome in cases like these, especially considering the risks of losing before or at trial, and how efficiently it was done. The full disgorgement theory would have been challenged by Defendant at trial and may not have succeeded because Defendant would argue that even contaminated products are not completely worthless.

11. As a result, Plaintiffs' damages theory likely to succeed here would have been based on the premium class members paid over what they would have paid had they known about the contamination or risk of contamination. This kind of "price-premium" damages analysis is widely accepted in consumer deception cases in this Circuit. *See e.g. Shaya Eidelman v. Sun Prods. Corp.*, 2022 U.S. App. LEXIS 15480, *1 (2d Cir. 2022) ("One method of demonstrating actual injury in the consumable goods context is by showing that the plaintiff paid a price premium").

12. Based on Class Counsels' experience in these kinds of consumer product contamination cases, as well as discussions with an economic expert who frequently uses conjoint analysis to calculate damages in similar cases, the best-case, price-premium scenario for products like this is generally around 30% of the purchase price. Here, the Settlement Class's best day under a 30% price premium model, would be between \$3.33 and \$3.66 million dollars, and the Settlement Agreement provides between 85% and 93% of this value. Thus, the class here is recovering somewhere between approximately 28-31% of the full disgorgement damages

Plaintiffs might have recovered at trial and 85-93% of the price premium. Even on the low end, this is a significant recovery.

13. Moreover, the Settlement provides significant non-monetary relief to the class as well. Specifically, in part as a result of the Litigation, Boar's Head made modifications to its practices and procedures regarding bacterial contamination, including implementing more frequent inspections and improving employee training. These modifications significantly benefit consumers, including Settlement Class Members who wish to purchase Defendant's products in the future.

14. As set forth in section 7.1 of the Class Action Settlement Agreement, and paragraph 15 of the Preliminary Approval Order, Plaintiffs are now applying to the Court for an award of their Attorneys' Fees and Costs. Plaintiffs are applying for attorneys' fees in the amount of one-third (\$1,033,333.33) of the Settlement Fund, expenses in the amount of \$38,060.00 and a service award of \$1,000 for each Plaintiff, to be paid from the Settlement Fund.

15. The reaction to the Settlement has been overwhelmingly favorable.

16. There have been approximately 66,000 Valid Claims, zero filed objections, and only three valid requests for exclusion.

II. BACKGROUND, PROCEDURAL HISTORY AND SETTLEMENT

a. Pre-Litigation Investigation, Litigation and Mediation

17. On July 24, 2025, in coordination with the USDA, Defendant announced the recall of certain meat products due to the potential for contamination with Lister, a harmful bacterium. The recall was expanded to include additional products on July 29, 2024.

18. Before commencing the Litigation, Class Counsel extensively investigated and analyzed, among other things, Defendant's marketing campaign, the relevant regulatory

guidelines concerning labeling and advertising, disclosure requirements for consumer products like the products at issue here, regulatory guidelines regarding the presence of bacteria in consumer products, the scientific research concerning the dangers of bacteria (including *Listeria*), and research regarding how Defendant should have known the Products contained bacteria (including *Listeria*).

19. On or about August 1, 2024, Plaintiff Torres filed a recall-related putative nationwide class action lawsuit against Boar's Head, captioned *Rita Torres v. Boar's Head Provisions Co., Inc.*, 1:24-cv-05405 (E.D.N.Y.), asserting claims for violations of N.Y. GBL §§349 & 350 in connection with her alleged purchase of one or more recalled products (the "*Torres Action*").

20. On or about August 16, 2024, Plaintiff Chuskas filed a recall-related putative nationwide class action lawsuit against Boar's Head, captioned *Samantha Chuskas v. Boar's Head Provisions Co., Inc.*, 1:24-cv-07343 (N.D. Ill.), asserting claims for violation of Illinois consumer protection laws, strict liability, negligence, breach of warranty, fraudulent concealment, and unjust enrichment in connection with her alleged purchase of one or more recalled products (the "*Chuskas Action*").

21. On or about August 26, 2024, Plaintiff Gatoff filed a recall-related putative nationwide class action lawsuit against Boar's Head, captioned *Sheryl Gatoff v. Boar's Head Provisions Co., Inc.*, 8:24-cv-01868 (C.D. Cal.), asserting claims for violation of California consumer protection laws and unjust enrichment in connection with her alleged purchase of one or more recalled products (the "*Gatoff Action*").

22. On or about October 21, 2024, Plaintiff Robby Harper filed a recall-related putative nationwide class action lawsuit against Boar's Head, captioned *Robby Harper v. Boar's Head Provisions Co., Inc.*, 2:24-cv-02910-DC-DMC (E.D. Cal.), asserting claims for violation

of California consumer protection laws and fraud by omission in connection with his alleged purchase of one or more recalled products (the “*Harper* Action”).

23. Finally, on or about October 29, 2024, Plaintiff Frank Pompilio filed the instant recall- related putative nationwide class action lawsuit against Boar’s Head, captioned *Frank Pompilio v. Boar's Head Provisions Co., Inc.*, 7:24-cv-08220 (S.D.N.Y.), asserting claims for violations of N.Y. GBL §§349 & 350 in connection with his alleged purchase of one or more recalled products (the “*Pompilio* Action”).

24. Class Counsel took it upon themselves to self-organize and coordinate the five actions in multiple states so that all the cases would proceed before this Court, eliminating duplication for the parties and the Courts and limiting the expense to both sides. This coordination also avoided a potentially lengthy leadership fight among counsel for Plaintiffs in the five actions.

25. Throughout this Litigation, Class Counsel conducted significant legal research and investigated industry reports, scientific and epidemiological studies, and literature regarding the dangers of Listeria and other bacteria, and the Covered Products’ market segment, including as follows:

- Class Counsel thoroughly analyzed the legal landscape and evaluated the risks and benefits of prosecuting the Litigation, researching potential claims, state consumer protection laws, and available remedies, and evaluating class certification issues.
- Class Counsel analyzed Defendant’s advertising campaigns and relevant regulations and guidelines concerning labeling and advertising disclosure requirements for consumer products, including other regulations and guidelines regarding the presence of hazardous and dangerous substances such as bacteria in consumer products. Class Counsel reviewed scientific research and literature concerning the dangers of bacteria (including *Listeria*) and investigated how Defendant should have known the Covered Products contained bacteria.
- Class Counsel consulted with industry experts regarding, *inter alia*, the presence of bacteria in consumer products, potential sources of bacteria in consumer products, and testing and screening for bacteria in consumer products.
- Class Counsel analyzed the chain of distribution and manufacturing process of the Covered

Products, focusing on pricing per unit to formulate Plaintiffs' damages model.

- Class Counsel consulted with experts regarding potential damages models for consumers purchasing adulterated or misbranded products contaminated with bacteria.
- Class Counsel also analyzed Defendant's market segment related to the Covered Products to understand the potential scope of the economic losses to Class Members, and marketing and sales trends, practices, and patterns.

26. Class Counsel also conducted testing of the products to determine the scope of potential contamination.

27. Class Counsel has substantial experience prosecuting class actions and, in particular, class actions involving contaminated consumer products, including bacterial contamination and contamination by ingredients that were not supposed to be included in the products. *See Swetz v. The Clorox Company*, No. 7:22-cv-9374 (S.D.N.Y.) (Halpern, J.); *Clinger v. Edgewell Personal Care Brands, LLC*, 3:21-cv-01040-JAM (D. Conn); *Catalano v. Lyons Magnus, LLC*, No. 7:22-cv-06867) (S.D.N.Y.) (Karas, J); *Patora v. Tarte, Inc.*, No. 18-cv-11760-KMK (S.D.N.Y.) (Karas, J.); *Rapoport-Hecht v. Seventh Generation*, No. 7:14-cv-09087 (S.D.N.Y.) *Mayhew, v. KAS Direct LLC*, No. 16-cv-6981-VB (S.D.N.Y.) (Karas, J.); *Swetz v. GSK Consumer Health, Inc.*, No. 7:20-cv-04731-NSR (S.D.N.Y) (Roman, J); *Bangoura v. Beiersdorf, Inc. and Bayer Healthcare, LLC*, Case No. 1:22-cv-00291-BMC (E.D.N.Y.) (Cogan, J.); *Luib v. Henkel Consumer Goods Inc.*, No. 1:17-cv-03021-BMC (E.D.N.Y.) (Cogan, J.); *Vincent, Wesley, et al. v. People Against Dirty, PBC. and Method Products, PBC.*, No. 7:16-cv-06936 (S.D.N.Y.) (Roman, J.); *Patora v. Colgate-Palmolive Co.*, No. 7:23-cv-01118-VB (S.D.N.Y.) (Briccetti, J.).

28. Before agreeing to resolve the claims in the Litigation, Class Counsel worked together to thoroughly analyze the legal landscape, including conducting research into the various state consumer protection laws and available remedies, Article III standing, preemption, and evaluating matters relating to class certification, in order to fully evaluate the risks and benefits to

a potential early resolution.

29. As the parties' discussions progressed, they agreed to informally exchange information about the Class Products, the possible contamination of the Class Products, the sales information about the Class Products, the recall of the Class Products, and information about the scope of the claims and the possible damages at issue. They agreed that an experienced mediator was necessary to guide the parties' settlement discussions about resolving the economic claims in this Litigation.

30. Accordingly, the parties sought the assistance of the highly respected JAMS mediator and retired federal Magistrate Judge, the Honorable Steven M. Gold.

31. In connection with the mediation, Class Counsel requested, and Defendant produced, critical discovery to enable Plaintiffs to evaluate their claims and position themselves to negotiate a settlement that would be fair and reasonable on behalf of the Settlement Class. This included additional information concerning the sales data of the Covered Products throughout the Class Period as well as Defendant's quality control and testing procedures, as well as bacterial contamination of the Covered Products.

32. A full-day mediation session took place on October 18, 2024 with Judge Gold (Ret.). At the mediation, the experienced counsel on both sides engaged in extensive arm's-length negotiations and were able to reach an agreement in principle to settle the economic claims on a class-wide basis by creating a non-reversionary \$3,100,000 common fund.

33. The Parties did not discuss Attorneys' Fees and Costs or any potential Incentive Award until they first agreed on the substantive terms of this Settlement.

34. After the mediation, the Parties continued to work diligently to negotiate and prepare the Settlement Agreement and other documents necessary to formalize the Settlement and present it to the Court for preliminary approval.

35. On November 15, 2024, the Parties informed the Court that they had reached a resolution of the matters and requested permission to file a consolidated amended complaint and a motion for preliminary approval, which the Court granted. ECF Nos. 8, 9.

36. On December 16, 2024, Plaintiffs filed a consolidated amended complaint for the purposes of settlement. ECF No. 10.

37. With respect to selecting a Settlement Administrator, before selecting Angeion Group (“Angeion”), Plaintiffs sought multiple bids from claims administrators and interviewed and vetted Angeion and its proposed notice plan for this Settlement.

38. The parties selected Angeion based on its reputation for excellent work and its breadth of experience administering other similar consumer class actions, including its ability to prevent fraudulent claims and protect the integrity of the claims process. For example, Angeion has administered similar class action settlements regarding consumer products. *See Catalano v. Lyons Magnus, LLC*, Case No. 7:22-cv-06867) (S.D.N.Y.); *Bangoura v. Beiersdorf, Inc. et al*, 1:22-cv-00291-BMC (E.D.N.Y.) *Swetz v. The Clorox Company*, No. 7:22-cv-9374 (S.D.N.Y.); *Patora v. Colgate-Palmolive Co.*, No. 7:23-cv-01118-VB (S.D.N.Y.).

39. All parties executed the Settlement Agreement on or before January 14, 2024.

b. Summary of Settlement Benefits and Risks of Continued Litigation

40. Class Counsel has made a non-reversionary \$3.1 million Settlement Fund available to Class Members, which will be exhausted to pay all Approved Claims, as well as any attorneys’ Fee Award, expenses, Service Awards, and Notice and Other Administrative Costs that the Court approves. §1.32.

41. As discussed above, the Settlement provides significant value to the Class Members that was not available through Defendant’s refund/recall program, resulting in a recovery of between 28% and 93% of Plaintiffs’ estimated best potential recovery at trial.

42. The value provided to Class Members is even more reasonable in light of the risks in this case.

43. Although Plaintiffs are confident about their claims, Plaintiffs nonetheless face significant risks in establishing liability.

44. If the Litigation were to continue, Plaintiffs would expect Defendant to continue to defend vigorously all aspects of Plaintiffs' claims, including on the class certification motion and the summary judgment motions.

45. The outcome of these proceedings cannot be certain, and if the Litigation were to proceed to trial, it would be a lengthy and complex affair, with appeals likely to follow.

46. Consistent with Second Circuit jurisprudence, in settling the Litigation, Plaintiffs accounted for the estimated damages, the benefits and risks of continuing litigation against Defendant, and the range of possible outcomes should the Litigation continue.

47. Although Plaintiffs allege that Defendant sold millions of Covered Products during the Class Period, the damages calculation is inherently complex and subject to varying interpretations as discussed above.

48. The Settlement also will provide an immediate and certain benefit to the Settlement Class and will avoid the substantial burdens, costs, and risks that continuing to litigate would impose on the parties, non-party witnesses, and the Court. There would be long and expensive litigation between this stage of the case and any potential verdict.

49. Even assuming *arguendo*, that continued litigation might result in a larger recovery than the Settlement, it would occur only after spending hundreds of thousands of dollars (or more) that would deplete a significant portion of any increased recovery.

50. Class Counsel undertook and litigated this case on a fully contingent basis. Class Counsel assumed a very real risk in taking on this contingent fee class action. Class Counsel has

demonstrated that they were prepared to invest time, effort, and money over a period of years with absolutely no guarantee of any recovery. If this Action had continued to be litigated and Plaintiffs were ultimately unsuccessful in their claims, Class Counsel would not be entitled to recover any attorneys' fees or costs.

51. Even if Plaintiffs could have defeated a motion to dismiss, obtained a class certification order and proceeded to trial, victory before the trier of fact would have been uncertain. Such uncertainty, moreover, was compounded by the appeals virtually certain to have followed any verdict. In short, while Class Counsel believes that the claims are viable and strong, there can be no denying the array of serious class-wide risks, any one of which could have precluded the Class and its counsel from recovering anything at all.

52. By any standard, this Settlement constitutes a favorable result made possible by the dedication and skill of Class Counsel under very difficult circumstances.

53. Moreover, Class Counsel are qualified, experienced, and able to conduct the Litigation. Class Counsel have invested considerable time and resources into prosecuting the Litigation and possess a long and proven track record of successfully prosecuting class actions, including false labeling cases, and numerous courts have appointed them as class counsel in other consumer class actions.

III. CLASS COUNSEL'S QUALIFICATIONS

54. Class Counsel are some of the nation's preeminent and most experienced class-action firms with extensive experience in consumer protection, product liability, antitrust, securities, financial, commercial and other complex class-action litigation.

55. Sultz & Lipari has substantial experience with consumer class actions in general, and with consumer fraud and false advertising, specifically. I have prosecuted, and been appointed as lead counsel in, numerous consumer fraud class action cases throughout the country, including

in cases before Your Honor, in which I have recovered millions of dollars and obtained injunctive relief on behalf of consumers. My significant experience representing consumers in class action litigation is detailed more fully in my firm resume which can be found at ECF No. 18-3.

56. The other members of Class Counsel are similarly experienced as set forth in their accompanying firm resumes. See ECF Nos. 18-4 through 18-8.

57. In the process of handling these cases, Class Counsel has devoted an extensive amount of time to investigating, litigating, settling, and administering these class actions.

IV. SUMMARY OF CLASS COUNSEL'S SIGNIFICANT WORK AND UNREIMBURSED LITIGATION EXPENSES

58. From the inception of this case to the present, Class Counsel vigorously investigated and pursued this litigation, committing their services and resources and advancing funds out-of-pocket to prosecute it for the Plaintiffs and the proposed Class. Class Counsel provided these services and advanced necessary litigation expenses with no assurance of compensation or repayment and have received no compensation or reimbursement of their expenses. Class Counsel's compensation and expense reimbursement has at all times in this litigation been entirely contingent upon successfully obtaining relief.

59. In July 2024, when Quaker announced the possible contamination of its products, Class Counsel started investigating the contamination and Quaker's corresponding false and misleading advertising. Class Counsel reviewed, inter alia, publicly available documents about Quaker's products, the recall, and Salmonella, and researched claims and federal regulations governing limits for contaminants like bacteria. They also interviewed and conferred with experts pertaining to sourcing of ingredients, testing/screening for bacteria, and economic damages models, and conferred with other counsel in advance of filing the first complaint in these cases. They also interviewed numerous consumers who had purchased the Covered Products.

60. Class Counsel diligently, skillfully and efficiently investigated and prosecuted this litigation from its inception in the face of skilled, professional and determined opposition from Defendant and its capable counsel. These efforts required researching and arguing complex legal and factual issues, and numerous meetings, extensive negotiations and other communications with defense counsel and third parties.

61. More specifically, Class Counsel's efforts on behalf of the Settlement Class included the following:

- a) investigating the underlying factual background regarding the contamination of the Covered Products with bacteria, including *Listeria* researching industry standards regarding sourcing of ingredients, screening and testing for bacteria, interviewing industry and supply experts regarding sourcing of ingredients for the products as well as preservatives to use to protect against bacterial contamination, and developing legal theories of the case regarding the misbranding and adulteration of the products;
- b) investigating and researching the applicable legal standards for product defect cases involving products such as the Covered Products;
- c) vetting and working with experts in the field of consumer products, including sourcing of ingredients, as well as screening and testing for bacteria;
- d) vetting and working with experts in the fields of economics and determining economic loss on a class-wide basis in consumer class actions;
- e) drafting the complaints and amended complaints;
- f) conducting legal research and analysis regarding the claims asserted by Plaintiffs as well as certification of consumer claims on a national basis and statewide basis;
- g) conducting informal (*i.e.* settlement) discovery pre-and post-mediation;
- h) legal research related to defendant's potential defenses;
- i) participating in case strategy decisions and discussions with other Class Counsel;
- j) conducting numerous arms-length, independent settlement negotiations with the JAMS mediator, Magistrate Gold (Ret.);

- k) drafting the settlement agreement along with the requisite exhibits, including claim forms, content of settlement webpage, opt out forms, long and short form notice forms, and other related documents;
- l) researching and selecting the claims administrator (Angeion) and implementing the notice program;
- m) developing and implementing the notice plan with claims administrator/notice provider Angeion;
- n) working with Angeion to prepare and send notice of the Settlement to putative Settlement Class Members, respond to inquiries from Settlement Class Members and others, and supervise the claims administration process;
- o) troubleshooting the claims process in conjunction with defendant's counsel and claims administrator/notice provider Angeion;
- p) speaking with class members who contacted class counsel regarding filing of claim forms; and
- q) preparing and drafting the motion for preliminary approval of the Settlement.

62. The chart below details the hours billed and the amount billed at current rates through July 30, 2025 for Sulzer & Lipari attorneys:

Attorney	Total Hours	Hourly Rate	Amount
Jason Sultzer	229.00	\$915	\$209,535.00
Jeremy Francis	118.30	\$875	\$103,512.50
Daniel Markowitz	11.70	\$875	10,237.50
Philip Furia	12.50	\$875	\$10,937.50
Total:	371.5		\$334,222.50

63. Records reflecting the time Sultzer & Lipari attorneys spent working on this matter are annexed hereto as **Exhibit 1**.

64. During the course of this case, Sultzer & Lipari incurred \$22,760.00 in unreimbursed expenses. These expenses were reasonably and necessarily incurred in connection with the prosecution of this litigation. These expenses are reflected in the books and records of Sultzer & Lipari and are a true and accurate summary of the expenses for this case. The chart

below details the expenses incurred by category:

CATEGORY	EXPENSE AMOUNT
Filing Fees	\$810.00
Expert Testing/Consulting Fees	\$14,000.00
Mediation Fees	\$7,950.00
TOTAL	\$22,760.00

65. Further, our work on this litigation has not ended and will not end until the last settlement distribution payment is made to eligible Settlement Class Members. We expect to expend additional hours going forward, which of course are not included in Class Counsel's lodestar reported below, concerning the Settlement approval and administration processes, potential appeals, preparing for the Final Approval Hearing, responding to Settlement Class Members and other inquiries and, if the Court grants final approval, overseeing Settlement administration.

66. The work performed by Class Counsel is set forth in the declarations from each firm accompanying Plaintiffs' motion.

67. The chart below details the hours billed and the amount billed at current rates through July 30, 2025 for Class Counsel (each of whom submits a supporting fee declaration with this motion):

Attorney	Total Hours	Lodestar
Sultzer & Lipari, PLLC	371.5	\$334,222.50
Levin Sedran & Berman	107.4	\$110,085.00
Leeds Brown Law, P.C.	361.5	\$160,670.00
Reese LLP	58.8	\$95,550.00
Milberg Coleman Bryson Phillips Grossman, PLLC	53.4	\$39,608.50
Poulin Willey Anastapoulo	98.4	\$50,309.20
Total:	1,051.00	\$790,445.20

68. This summary was prepared from contemporaneous, daily time records regularly

prepared and maintained by Class Counsel.

69. As set forth in the accompanying fee declarations, the detailed descriptions of the time spent by the attorneys and other professionals at Class Counsel's firms in this litigation was prepared from contemporaneous, daily time records prepared and maintained by each firm. The lodestar figure is based on the ordinary professional billing rates that Class Counsel charges clients in class action litigation. Expenses are accounted for and billed separately, without markup, and are not duplicated in the professional billing rates. Further details regarding the litigation and trial experience of each professional can be found, to the extent available, in accompanying fee declarations and the firm resumes.

70. The hourly rates shown in the accompanying fee declarations are the usual and customary lodestar rates charged in the Southern District of New York, and the national venues in which the firms typically handle cases for each individual doing the type of work performed in this litigation. These rates were not adjusted, notwithstanding the complexity of this litigation, the skill and tenacity of the opposition, the preclusion of other employment, the delay in payment, or any other factors that could be used to justify higher hourly compensation. The rates reflect Class Counsel's experience in the field and the complexity of the matters involved in this litigation and have not been adjusted.

71. Moreover, Class Counsel made every effort to work efficiently and minimize the number of billing attorneys within each firm.

72. I believe that the time reflected in Class Counsel's lodestar calculation and the expenses for which payment is sought are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of this litigation.

73. The lodestar summary reflects Class Counsel's experience in the field, the complexity of the matters involved in this litigation, and the prevailing rate for providing such

services.

74. The number of hours that Class Counsel has devoted to pursuing this litigation is reasonable and appropriate, considering, among other factors: (a) the scope and high stake's nature of this proceeding; and b) the novelty and complexity of the claims asserted in the litigation.

75. From the inception of this matter through July 30, 2025, Class Counsel expended 1,051 hours prosecuting this litigation, resulting in a total lodestar of \$790,445.20

76. As of today, the requested total attorney fee amounts to a modest multiplier of approximately 1.3. That multiplier is further justified by the significant non-monetary relief achieved on behalf of the Class. Notably, Class Counsel will continue to spend time and resources overseeing the Settlement administration, assisting Class Members, and tending to any other issues that may arise related to the Settlement. Accordingly, Class Counsel's lodestar multiplier will decrease as they continue to work on the litigation in advance of the final approval hearing in August 2025.

77. The requested fee is in line with the fee range commonly granted in other class action cases in the Second Circuit and elsewhere as discussed more fully in Plaintiffs' accompanying Memorandum of Law in support of their request for attorneys' fees.

78. During the course of this case, Class Counsel incurred \$38,060.33 in unreimbursed expenses. These expenses were reasonably and necessarily incurred in connection with prosecuting this litigation. These expenses are reflected in the books and records of Class Counsel and are a true and accurate summary of the expenses for this case as detailed in the accompanying declarations from Class Counsel. The chart below details the expenses incurred by category:

CATEGORY	EXPENSE AMOUNT
Computer Research	\$22.30
Filing fees	\$2,025.00
Travel	\$9,947.47
Expert Testing/Consultant Fees	\$14,000.00
JAMS (Mediation)	\$11,550.00
Notary/Miscellaneous	\$515.56
TOTAL	\$38,060.33

V. SERVICE AWARDS

79. Class Counsel requests a service award of \$1,000 for the Class Representative Plaintiffs. The named Plaintiffs were subjected to an extensive vetting interview. The named plaintiffs also provided information to substantiate the purchased products. The plaintiffs took on the responsibilities of a class representative, and were willing to be deposed, provide discovery, and testify at trial.

VI. CONCLUSION

80. For the reasons set forth in this declaration, Class Counsel respectfully requests that the Court grant Plaintiffs' Motion for an award of Attorneys' Fees, Expenses and Service Awards for Class Representative Plaintiffs.

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

Executed this 1st day of August 2025 in Poughkeepsie, New York.

/s/ Jason Sultzer









Jason Sultzer

EXHIBIT 1

Activities Export

08/01/2025

2:37 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/31/2025	 Unbilled	Draft declarations for final approval papers.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	4.30h	\$875.00	-	\$3,762.50
07/30/2025	 Unbilled	Continue to draft final approval papers and conduct research re: prior similar settlements to include in brief.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	5.20h	\$875.00	-	\$4,550.00
07/30/2025	 Unbilled	Prepare for final approval hearing and prepare outline re: same.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	5.60h	\$915.00	-	\$5,124.00
07/29/2025	 Unbilled	Draft final approval papers and prepare all exhibits re: same.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	3.70h	\$875.00	-	\$3,237.50
07/28/2025	 Unbilled	Confer with claims admin re: final approval and issues to be addressed.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.40h	\$915.00	-	\$366.00
07/25/2025	 Unbilled	Draft final approval papers.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	2.20h	\$875.00	-	\$1,925.00
07/24/2025	 Unbilled	Draft final approval papers.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	4.20h	\$875.00	-	\$3,675.00
07/23/2025	 Unbilled	Draft final approval papers.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	4.80h	\$875.00	-	\$4,200.00
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h









Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/21/2025	 Unbilled	Confer with claims admin re: monies back to class members.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.40h	\$915.00	-	\$366.00
06/22/2025	 Unbilled	Confer with claimant re: claim and process for final approval.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.40h	\$915.00	-	\$366.00
06/18/2025	 Unbilled	Confer with named Plaintiffs re: status of settlement.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.30h	\$915.00	-	\$274.50
06/10/2025	 Unbilled	Call with co-counsel re: briefing final approval. Prepare emails re: same.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	1.10h	\$875.00	-	\$962.50
05/20/2025	 Unbilled	Analyze claims data and impact on settlement.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.70h	\$915.00	-	\$640.50
04/22/2025	 Unbilled	Confer with named plaintiff re: status.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.50h	\$875.00	-	\$437.50
02/08/2025	 Unbilled	Review settlement web page and identify potential issues.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	1.80h	\$915.00	-	\$1,647.00
02/08/2025	 Unbilled	Call with counsel re: settlement web page.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.30h	\$915.00	-	\$274.50
02/07/2025	 Unbilled	Research issues with electronic forms of payment.	01000.00592 Boar's Head Listeria Recall	Jason Sultzer	1.40h	\$915.00	-	\$1,281.00
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h














Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	Potential Class Action					
02/07/2025	🕒	Confer with claims admin re: settlement page and potential methods of payments to class members. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.80h	\$915.00	-	\$732.00
02/05/2025	🕒	Analyze claims deadline timeline and confer with counsel re: same. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.70h	\$915.00	-	\$640.50
01/31/2025	🕒	Emails from defense counsel re: dismissal of Harper action. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.20h	\$915.00	-	\$183.00
01/28/2025	🕒	Review emails with defense counsel re: status of settlement agreement. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.20h	\$915.00	-	\$183.00
01/27/2025	🕒	Emails to defense counsel re: notice of dismissal and settlement agreement. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.30h	\$915.00	-	\$274.50
01/27/2025	🕒	Emails with defense counsel re: settlement web page name. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.20h	\$915.00	-	\$183.00
01/17/2025	🕒	Continue to draft preliminary approval motion and accompanying affidavits. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	4.80h	\$875.00	-	\$4,200.00
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h






Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/16/2025	 ● Unbilled	Prepare sections of notice plan.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.80h	\$915.00	-	\$732.00
01/16/2025	 ● Unbilled	Continue to draft preliminary approval motion.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	5.00h	\$875.00	-	\$4,375.00
01/15/2025	 ● Unbilled	Conduct research re: preliminary approval motion re: settlement in a litigation context and impact Moses NY Times case.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	4.60h	\$875.00	-	\$4,025.00
01/14/2025	 ● Unbilled	Emails to defense counsel re: settlement agreement.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.30h	\$915.00	-	\$274.50
01/14/2025	 ● Unbilled	Pc w/ Angelina DiBacco re: answering putative class member questions. Prepare memo re: same.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.80h	\$875.00	-	\$700.00
01/14/2025	 ● Unbilled	Pc with JF re: prelim approval motion and case strategy.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.40h	\$875.00	-	\$350.00
01/14/2025	 ● Unbilled	Continue to draft preliminary approval motion and accompanying declarations.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	4.10h	\$875.00	-	\$3,587.50
01/14/2025	 ● Unbilled	Research proposed issues with notice plan and sequencing of the	01000.00592 Boar's Head Listeria Recall	Dan Markowitz	1.80h	\$875.00	-	\$1,575.00
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		motions.  Unbilled	Potential Class Action					
01/13/2025		Finalize revisions to preliminary approval motion.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.80h	\$915.00	-	\$732.00
01/13/2025		Meeting with claims admin re: notice & settlement.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	3.80h	\$915.00	-	\$3,477.00
01/13/2025		Continue to revise preliminary approval motion.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	4.00h	\$875.00	-	\$3,500.00
01/10/2025		Review/revise preliminary approval motion and conduct research re: class cert requirements.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	4.70h	\$875.00	-	\$4,112.50
01/09/2025		Draft preliminary approval motion.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	4.20h	\$875.00	-	\$3,675.00
01/08/2025		Continue to work on preliminary approval motion.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	3.90h	\$875.00	-	\$3,412.50
01/07/2025		Draft preliminary approval motion.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	4.30h	\$875.00	-	\$3,762.50
01/06/2025		Prepare declarations for preliminary approval.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	4.80h	\$875.00	-	\$4,200.00
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/05/2025	 Unbilled	Draft preliminary approval motion.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	3.40h	\$875.00	-	\$2,975.00
12/31/2024	 Unbilled	Confer with counsel re: issues with consolidated complaint.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.60h	\$915.00	-	\$549.00
12/31/2024	 Unbilled	Finalize consolidated complaint.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	3.20h	\$875.00	-	\$2,800.00
12/30/2024	 Unbilled	Review/revise settlement agreement and exhibits.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	2.80h	\$875.00	-	\$2,450.00
12/30/2024	 Unbilled	Confer with claims admin re: fraud detection & review prior court decisions re: same.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	3.40h	\$915.00	-	\$3,111.00
12/20/2024	 Unbilled	Revise settlement agreement and exhibits.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	2.40h	\$875.00	-	\$2,100.00
12/17/2024	 Unbilled	Confer with named Plaintiffs re: settlement agreement.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.40h	\$915.00	-	\$366.00
12/17/2024	 Unbilled	Continue to review and revise settlement agreement exhibits.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	2.60h	\$875.00	-	\$2,275.00
12/16/2024	 Unbilled	Conduct research on issues re: amended complaint state law	01000.00592 Boar's Head Listeria Recall	Dan Markowitz	1.90h	\$875.00	-	\$1,662.50
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		claims and impact on class cert in settlement context. ● Unbilled	Potential Class Action					
12/13/2024	🕒	Review co-counsel changes to settlement agreement and conduct research on general waiver claims for class release. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	1.90h	\$875.00	-	\$1,662.50
12/10/2024	🕒	Continue to draft consolidated complaint. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	2.50h	\$875.00	-	\$2,187.50
12/09/2024	🕒	Confer with defense counsel re: settlement agreement. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.30h	\$915.00	-	\$274.50
12/09/2024	🕒	Revise settlement agreement and draft consolidated complaint. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	3.30h	\$875.00	-	\$2,887.50
12/04/2024	🕒	Review defendant changes to settlement agreement and conduct research re: same. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	3.00h	\$875.00	-	\$2,625.00
12/03/2024	🕒	Call with Kroll claims administrator re: potential retention. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	0.70h	\$875.00	-	\$612.50
12/02/2024	🕒	Research background re: Kroll re: potential bid and prior recall cases it administered and fraud detection methods it implements.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	1.80h	\$915.00	-	\$1,647.00
					371.50h		\$0.00 0.00h	\$334,222.50 371.50h









Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
11/14/2024	🕒	Draft and review letters to stay cases and set schedule for amending complaint and preliminary approval. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	1.60h	\$875.00	-	\$1,400.00
11/13/2024	🕒	Pc with JS re: issues with settlement. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.40h	\$875.00	-	\$350.00
11/13/2024	🕒	Pc w/ putative class member re: answering questions. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.50h	\$875.00	-	\$437.50
11/12/2024	🕒	Review/revise settlement agreement and confer with counsel re: same. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	2.40h	\$875.00	-	\$2,100.00
11/11/2024	🕒	Review additional co-counsel changes to settlement agreement. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	1.90h	\$875.00	-	\$1,662.50
11/06/2024	🕒	Pc re: waiver of service. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.20h	\$875.00	-	\$175.00
11/05/2024	🕒	Email defense counsel re: status of preliminary approval motion. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.10h	\$915.00	-	\$91.50
11/05/2024	🕒	Emails re: waiver of service. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.20h	\$875.00	-	\$175.00
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h

Activities Export

08/01/2025

2:37 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Potential Class Action								
11/05/2024	 ● Unbilled	Reviewed updated draft of waiver of service from Defendant.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.20h	\$875.00	-	\$175.00
11/05/2024	 ● Unbilled	Emails re: waiver of service.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.20h	\$875.00	-	\$175.00
10/31/2024	 ● Unbilled	Email potential second filer and conversation with counsel re: same.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.80h	\$915.00	-	\$732.00
10/31/2024	 ● Unbilled	Confer with new plaintiff re: amended complaint.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.40h	\$915.00	-	\$366.00
10/31/2024	 ● Unbilled	Emails with JS re: strategy for waiver of service and timing of when to file preliminary approval.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.20h	\$875.00	-	\$175.00
10/31/2024	 ● Unbilled	Confer with additional claims admin for potential retention and bids and prepare memo re: same.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.70h	\$915.00	-	\$2,470.50
10/31/2024	 ● Unbilled	Emails w/ Defendant re: service of summons and complaint.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.20h	\$875.00	-	\$175.00
10/31/2024	 ● Unbilled	Reviewed as filed complaint.	01000.00592 Boar's Head Listeria Recall	Dan Markowitz	0.20h	\$875.00	-	\$175.00
					371.50h		\$0.00 0.00h	\$334,222.50 371.50h









Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
Potential Class Action								
10/31/2024	 ● Unbilled	Emails with JS re: amended complaint.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.20h	\$875.00	-	\$175.00
10/31/2024	 ● Unbilled	Pc with JS re: strategy for amended complaint.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.30h	\$875.00	-	\$262.50
10/31/2024	 ● Unbilled	Research potential unjust enrichment claims for amended complaint and impact of certifying a national class.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	1.80h	\$915.00	-	\$1,647.00
10/29/2024	 ● Unbilled	Email counsel re: complaint.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.20h	\$915.00	-	\$183.00
10/29/2024	 ● Unbilled	Research named plaintiff's products to be included in the complaint.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	1.50h	\$915.00	-	\$1,372.50
10/28/2024	 ● Unbilled	Confer with defense counsel re: case.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.20h	\$915.00	-	\$183.00
10/24/2024	 ● Unbilled	Draft settlement agreement.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	3.80h	\$875.00	-	\$3,325.00
10/19/2024	 ● Unbilled	Email & calls with defense counsel re: settlement.	01000.00592 Boar's Head Listeria Recall	Jason Sultzer	0.40h	\$915.00	-	\$366.00
					371.50h		\$0.00 0.00h	\$334,222.50 371.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	Potential Class Action					
10/19/2024	🕒	Confer with counsel re: settlement / term sheet. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.80h	\$915.00	-	\$732.00
10/18/2024	🕒	Emails re: settlement. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.20h	\$915.00	-	\$183.00
10/18/2024	🕒	Further prepare for, travel to and from, and attend mediation and meeting with counsel at conclusion. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	15.50h	\$915.00	-	\$14,182.50
10/17/2024	🕒	Call with counsel re: issues with proposed settlement. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.70h	\$915.00	-	\$640.50
10/17/2024	🕒	Document review for preparation for mediation including sales data, recall data, and manufacturing processes. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	4.70h	\$915.00	-	\$4,300.50
10/16/2024	🕒	Continue to work on calculating the contamination rate of products with expert. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	1.20h	\$915.00	-	\$1,098.00
10/16/2024	🕒	Research cases cited in mediation statement & prepare memo re: same in preparation of mediation. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	3.30h	\$915.00	-	\$3,019.50
					371.50h		\$0.00 0.00h	\$334,222.50 371.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/16/2024	 Unbilled	Prepare opening statement for mediation and memo for non-monetary relief for potential settlement.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	4.80h	\$915.00	-	\$4,392.00
10/16/2024	 Unbilled	Review defendant's mediation statement.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	1.60h	\$875.00	-	\$1,400.00
10/15/2024	 Unbilled	Confer with named plaintiff re: status of mediation.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.30h	\$915.00	-	\$274.50
10/15/2024	 Unbilled	Prepare & negotiate confidentiality agreement and emails with defense counsel re: same.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.90h	\$915.00	-	\$2,653.50
10/15/2024	 Unbilled	Prepare for mediation by providing Judge Gold prior similar settlements and damage models.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	4.30h	\$915.00	-	\$3,934.50
10/15/2024	 Unbilled	Review and finalize mediation statement for submission.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	1.90h	\$915.00	-	\$1,738.50
10/15/2024	 Unbilled	Continue to review/revise mediation statement.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	2.10h	\$875.00	-	\$1,837.50
10/15/2024	 Unbilled	Read and analyzed D's request for ext of time to Answer and Order granting same.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.20h	\$875.00	-	\$175.00
					371.50h		\$0.00 0.00h	\$334,222.50 371.50h
















Activities Export

08/01/2025

2:37 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
10/14/2024	🕒	Calculate opening demand for purpose of mediation and confer with counsel re: same. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.90h	\$915.00	-	\$2,653.50
10/14/2024	🕒	Revisions to mediation statement and confer with counsel re: same. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	1.40h	\$915.00	-	\$1,281.00
10/14/2024	🕒	Confer with economist expert re: issues with price premium. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.80h	\$915.00	-	\$732.00
10/14/2024	🕒	Continue to prepare for mediation by preparing proposal for injunctive relief re: quality and control procedure. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	3.70h	\$915.00	-	\$3,385.50
10/14/2024	🕒	Prepare damages model for mediation. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	4.10h	\$915.00	-	\$3,751.50
10/14/2024	🕒	Review/revise mediation statement and conduct research on prior contamination settlements. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	3.80h	\$875.00	-	\$3,325.00
10/14/2024	🕒	Conduct additional research for mediation statement re: treble damages in each state. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Philip Furia	3.20h	\$875.00	-	\$2,800.00
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/13/2024		Review literature re: food manufacturing facilities and safety protocol in anticipation of mediation.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.80h	\$915.00	-	\$2,562.00
10/11/2024		Confer with former employee at defendant's plant and impact on case and prepare memo re: same.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.80h	\$915.00	-	\$2,562.00
10/11/2024		Continue to draft mediation statement.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	3.00h	\$875.00	-	\$2,625.00
10/10/2024		Confer with defense counsel re: settlement.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.30h	\$915.00	-	\$274.50
10/10/2024		Analyze issues with preemption regarding recall and impact on case and mediation.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.70h	\$915.00	-	\$2,470.50
10/09/2024		Conduct research on mootness of recalls and impact on GBL claims in anticipation of mediation.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	3.60h	\$915.00	-	\$3,294.00
10/08/2024		Prepare outline for mediation statement for JF.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	1.90h	\$915.00	-	\$1,738.50
10/08/2024		Analyze ratio of contaminated vs. non-contaminated recalled foods	01000.00592 Boar's Head Listeria Recall	Jason Sultzer	2.40h	\$915.00	-	\$2,196.00
					371.50h		\$0.00 0.00h	\$334,222.50 371.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		with consultant. ● Unbilled	Potential Class Action					
10/07/2024		Email from defense counsel re: status of document production. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.20h	\$915.00	-	\$183.00
10/06/2024		Confer with food safety expert re: status of testing and prepare memo re: same. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.80h	\$915.00	-	\$732.00
09/30/2024		Review email from Judge Gold re: mediation. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.10h	\$915.00	-	\$91.50
09/23/2024		Continue to revise document production requests for defense counsel re: mediation. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	1.40h	\$915.00	-	\$1,281.00
09/23/2024		Confer with counsel re: issues for mediation. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.50h	\$915.00	-	\$457.50
09/19/2024		Meeting with named plaintiff re: preparation for mediation. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	4.60h	\$915.00	-	\$4,209.00
09/19/2024		Call with defense counsel Re: mediation discovery. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	0.80h	\$875.00	-	\$700.00
09/18/2024		Email defense counsel re: mediation.	01000.00592 Boar's Head Listeria Recall	Jason Sultzer	0.10h	\$915.00	-	\$91.50
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	Potential Class Action					
09/18/2024	🕒	Email with defense counsel re: document production for mediation. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.30h	\$915.00	-	\$274.50
09/18/2024	🕒	Continue to prepare document production requests for mediation. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	3.80h	\$915.00	-	\$3,477.00
09/16/2024	🕒	Emails with defense counsel re: issues with mediation. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.20h	\$915.00	-	\$183.00
09/16/2024	🕒	Pc w/ Mary Clair re: answering questions re: putative class member inquiry and prepare memo re: same. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.40h	\$875.00	-	\$350.00
09/14/2024	🕒	Review email from defense counsel and counsel for Chuskas re: consolidation and confer with counsel re: same. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.30h	\$915.00	-	\$274.50
09/11/2024	🕒	Consulting with experts re: testing and research any prior Daubert issues. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	3.60h	\$915.00	-	\$3,294.00
09/10/2024	🕒	Email with defense counsel re: Judge Gold and mediation. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.20h	\$915.00	-	\$183.00
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/10/2024	 Unbilled	Meeting with food strategy consultant re: testing.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	5.30h	\$915.00	-	\$4,849.50
09/09/2024	 Unbilled	Email re: issues with mediator Gold.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.10h	\$915.00	-	\$91.50
09/06/2024	 Unbilled	Email with defense counsel re: mediation.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.20h	\$915.00	-	\$183.00
09/05/2024	 Unbilled	Identify further products to test.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.80h	\$915.00	-	\$732.00
09/05/2024	 Unbilled	Continue to analyze revised testing protocol for contamination.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.80h	\$915.00	-	\$2,562.00
09/04/2024	 Unbilled	Email to defense counsel re: informal discovery.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.20h	\$915.00	-	\$183.00
09/04/2024	 Unbilled	Email with defense counsel re: waiver of service.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.20h	\$915.00	-	\$183.00
09/04/2024	 Unbilled	Confer with potential expert epidemiologists re: retention and conduct background search re: same.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.90h	\$915.00	-	\$823.50
09/04/2024	 Unbilled	Confer with defense counsel re:	01000.00592	Jason	0.40h	\$915.00	-	\$366.00
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h

Activities Export

08/01/2025

2:37 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		potential mediation. ● Unbilled	Boar's Head Listeria Recall Potential Class Action	Sultzer				
09/04/2024	🕒	Analyze various mediators' CVs for purpose of mediation. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	1.00h	\$915.00	-	\$915.00
09/04/2024	🕒	Analyze issues with insurance coverage and impact on case and research re: same re: what triggers an injury in anticipation of mediation. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.60h	\$915.00	-	\$2,379.00
09/03/2024	🕒	Confer with mediator. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.30h	\$915.00	-	\$274.50
09/03/2024	🕒	Review email re: waiver of service in Illinois Claim. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.10h	\$915.00	-	\$91.50
08/30/2024	🕒	Confer with defense counsel re: mediation. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.30h	\$915.00	-	\$274.50
08/30/2024	🕒	Email to PD re: Illinois complaint. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.10h	\$915.00	-	\$91.50
08/29/2024	🕒	Research potential labs for testing and necessary accreditations. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.80h	\$915.00	-	\$2,562.00
08/26/2024	🕒	Email with MR re: complaint and	01000.00592	Jason	0.40h	\$915.00	-	\$366.00
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h

Activities Export
















08/01/2025

2:37 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		affirmation and impact on NY claim. ● Unbilled	Boar's Head Listeria Recall Potential Class Action	Sultzer				
08/26/2024	🕒	Review and confer with various labs re: testing of products. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.80h	\$915.00	-	\$2,562.00
08/22/2024	🕒	Research issues re: testing methodology and whether will pass Daubert. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	3.20h	\$915.00	-	\$2,928.00
08/21/2024	🕒	Email with JS re: putative class member inquiries. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.10h	\$875.00	-	\$87.50
08/21/2024	🕒	Pc w/ Phil re: putative class member inquiries. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.10h	\$875.00	-	\$87.50
08/21/2024	🕒	Review and revise california complaint. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Philip Furia	2.30h	\$875.00	-	\$2,012.50
08/21/2024	🕒	Pcs w/ putative class members re: putative class member inquiries and prep for same. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.60h	\$875.00	-	\$525.00
08/20/2024	🕒	Continue to review and revise testing protocol. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.80h	\$915.00	-	\$732.00
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h

Activities Export

08/01/2025
2:37 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
08/20/2024		Continued draft of Boar's Head complaint in California and conduct research re: same UCL claims and omissions.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Philip Furia	2.60h	\$875.00	-	\$2,275.00
08/19/2024		Continue to prepare California complaint and discuss same with plaintiff.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Philip Furia	2.40h	\$875.00	-	\$2,100.00
08/13/2024		Confer with potential claimant re: claim.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.40h	\$915.00	-	\$366.00
08/13/2024		Pc to RW re: returning his submission re: putative class member inquiry.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.10h	\$875.00	-	\$87.50
08/13/2024		Pc w/ Alenka Rajic re: putative class member inquiry.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.30h	\$875.00	-	\$262.50
08/13/2024		Review 2nd recall and issues with same and instructions in the recall notice.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.20h	\$915.00	-	\$2,013.00
08/13/2024		Emails with JS re: case strategy.  Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.10h	\$875.00	-	\$87.50
08/12/2024		Emails with JS re: RW putative class member inquiry.	01000.00592 Boar's Head Listeria Recall	Dan Markowitz	0.10h	\$875.00	-	\$87.50
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled	Potential Class Action					
08/12/2024	🕒	Pc to RW re: returning his submission re: putative class member inquiry. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.10h	\$875.00	-	\$87.50
08/09/2024	🕒	Work on retention of testing lab. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	1.40h	\$915.00	-	\$1,281.00
08/07/2024	🕒	Confer with additional potential plaintiffs to be included in suit. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	1.30h	\$915.00	-	\$1,189.50
08/06/2024	🕒	Analyze prior case law re: meat recalls and impact on pleadings. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.40h	\$915.00	-	\$2,196.00
08/05/2024	🕒	Review CV's for potential food safety experts. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	1.90h	\$915.00	-	\$1,738.50
08/05/2024	🕒	Further review studies re: dangers with bacteria and quality control measures to prevent same. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	4.20h	\$915.00	-	\$3,843.00
08/05/2024	🕒	Emails with JS re: case strategy. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.10h	\$875.00	-	\$87.50
08/04/2024	🕒	Email to AC re: claims intake. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.10h	\$915.00	-	\$91.50
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h

Activities Export








Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
08/02/2024	 ● Unbilled	Review literature re: manufacturing process for cleaning products and potential contamination sources.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	3.40h	\$915.00	-	\$3,111.00
08/02/2024	 ● Unbilled	Email with AC re: NOA.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.10h	\$875.00	-	\$87.50
08/01/2024	 ● Unbilled	Confer with potential named plaintiff.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.40h	\$915.00	-	\$366.00
08/01/2024	 ● Unbilled	Analyze effectiveness of recall.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.40h	\$915.00	-	\$2,196.00
08/01/2024	 ● Unbilled	Confer with GM for supermarket re: impact of recall and effectiveness of same and impact on retailers.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.70h	\$915.00	-	\$2,470.50
08/01/2024	 ● Unbilled	Continue to revise complaint and research claims for fraudulent omissions.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	3.80h	\$915.00	-	\$3,477.00
08/01/2024	 ● Unbilled	Continue to conduct research for legal claims in complaint.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	3.60h	\$915.00	-	\$3,294.00
08/01/2024	 ● Unbilled	Conduct research/analyze various products compared to competitors for price premium analysis re: potential lawsuit.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	4.40h	\$915.00	-	\$4,026.00

Activities Export

08/01/2025
2:37 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
08/01/2024	🕒	Continue to vet plaintiffs to serve as named plaintiff and prepare memo re: same. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.60h	\$915.00	-	\$2,379.00
08/01/2024	🕒	Research additional claims against Boar's Head for potential complaint re: viability of injunctive relief. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	3.30h	\$915.00	-	\$3,019.50
08/01/2024	🕒	Read and analyzed draft of complaint. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.50h	\$875.00	-	\$437.50
08/01/2024	🕒	Review and revise complaint. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Philip Furia	2.00h	\$875.00	-	\$1,750.00
08/01/2024	🕒	Review and revise draft complaint. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jeremy Francis	1.60h	\$875.00	-	\$1,400.00
08/01/2024	🕒	Emails re: status of complaint ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.10h	\$875.00	-	\$87.50
07/31/2024	🕒	Confer with potential plaintiffs. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.80h	\$915.00	-	\$732.00
07/31/2024	🕒	Review/research various ingredients and labeling and preservatives in Boar's Head products and impact on anticipated	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	3.80h	\$915.00	-	\$3,477.00
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h

Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		complaint and testing. ● Unbilled						
07/31/2024		Review various labels for over 40 Boar's Head products to be included in complaint. Continue to review corporate structure of potential defendant and prior lawsuits. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	4.60h	\$915.00	-	\$4,209.00
07/31/2024		Continued research re: complaint ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.50h	\$875.00	-	\$437.50
07/31/2024		Pc with JS re: complaint. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Dan Markowitz	0.10h	\$875.00	-	\$87.50
07/30/2024		Research standing issues for anticipated complaint with testing for named plaintiff's products. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	3.60h	\$915.00	-	\$3,294.00
07/30/2024		Research preemption issues for meat products and impact on complaint. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	4.30h	\$915.00	-	\$3,934.50
07/29/2024		Continue to discuss with experts re: testing and research potential products re: same. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	1.60h	\$915.00	-	\$1,464.00
07/29/2024		Review additional products subject to recall and adequacy of notice re:	01000.00592 Boar's Head Listeria Recall	Jason Sultzer	2.90h	\$915.00	-	\$2,653.50

Activities Export

08/01/2025
2:37 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		recall. ● Unbilled	Potential Class Action					
07/29/2024		Analyze issues with GBL 349 for omission claims. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.80h	\$915.00	-	\$2,562.00
07/28/2024		Research case law are recalls enough to assert standing in lieu of testing. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	1.50h	\$915.00	-	\$1,372.50
07/27/2024		Research potential medical monitoring clams and whether viable. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.50h	\$915.00	-	\$2,287.50
07/27/2024		Continue to discuss case with potential named plaintiffs. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	1.50h	\$915.00	-	\$1,372.50
07/27/2024		Conduct background check on Boar's Head re: prior lawsuits and prior issues with factory and impact on potential suit. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	3.90h	\$915.00	-	\$3,568.50
07/26/2024		Confer with potential experts re: testing of products. ● Unbilled	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	0.60h	\$915.00	-	\$549.00
07/26/2024		Investigate chain of distribution of contaminated products and research viability of naming retailers as defendants.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.70h	\$915.00	-	\$2,470.50
					371.50h		\$0.00 0.00h	\$334,222.50 371.50h

Activities Export

08/01/2025
2:37 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
07/26/2024	🕒	Investigation for reviewing adequacy of recall notice.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	3.20h	\$915.00	-	\$2,928.00
		● Unbilled						
07/26/2024	🕒	Meeting with potential named plaintiff re: potential suit against Boar's Head.	01000.00592 Boar's Head Listeria Recall Potential Class Action	Jason Sultzer	2.80h	\$915.00	-	\$2,562.00
		● Unbilled						
					371.50h		\$0.00	\$334,222.50
							0.00h	371.50h