

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES ZILINSKY, GERALDINE)	CASE NO. 2:20-cv-6229-MHW-KAJ
ZILINSKY, CORY SIMPSON, MEAGAN)	
McGINLEY, SANDRA)	
GARRETTDORSEY, BRIAN DERING,)	JUDGE MICHAEL H. WATSON
THERESA DERING, ALAN)	
ARMSTRONG, and SANDY)	
ARMSTRONG, individually and on behalf of)	
all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	
)	
LEAFFILTER NORTH, LLC,)	
)	
Defendant.)	

**PLAINTIFFS' MOTION FOR APPROVAL OF ATTORNEYS' FEES, EXPENSE
REIMBURSEMENT, AND CLASS REPRESENTATIVE SERVICE AWARDS**

Pursuant to the Settlement Agreement [ECF No. 56-2] and Rule 23 of the Federal Rules of Civil Procedure, Plaintiffs James Zilinsky, Geraldine Zilinsky, Cory Simpson, Meagan McGinley, Sandra GarrettDorsey, Brian Dering, Theresa Dering, Alan Armstrong, and Sandy Armstrong (collectively, "Plaintiffs"), individually and as the Class Representatives on behalf of all others similarly situated, hereby move this Court for an order approving the payment of (1) \$1,749,416.31 for attorney fees; (2) \$25,583.69 for reimbursement of expenses; and (3) a \$3,500 service award for each Plaintiff household. The legal and factual bases supporting this Motion are fully set forth in Plaintiffs' Memorandum in Support of Motion for Approval of Attorneys' Fees, Expense Reimbursement, and Class Representative Service Awards and Exhibits thereto, as well as Plaintiffs' Memorandum of Law in Support of Motion for Preliminary Approval of Class Action Settlement Agreement [ECF No. 56-1] incorporated herein by reference. A proposed Order

granting this Motion will be provided as an attachment to the Motion for Final Approval of the Class Action Settlement due to be filed no later than February 14, 2023.

Respectfully submitted,

/s/ Jeffrey S. Goldenberg

Jeffrey S. Goldenberg (0063771)

Todd B. Naylor (0068388)

GOLDENBERG SCHNEIDER, LPA

4445 Lake Forest Drive, Suite 490

Cincinnati, OH 45242

Telephone: (513) 345-8291

Facsimile: (513) 345-8294

Email: jgoldenberg@gs-legal.com

tnaylor@gs-legal.com

Janet R. Varnell*

Matthew Peterson*

Brian Warwick*

VARNELL & WARWICK

1101 E. Cumberland Avenue

Suite 201H, #105

Tampa, FL 33602

Telephone: (352)753-8600

Email: jvarnell@varnellandwarwick.com

mpeterson@varnellandwarwick.com

bwarwick@varnellandwarwick.com

* Admitted *Pro Hac Vice*

On April 1, 2021, Plaintiffs filed the First Amended Class Action Complaint [ECF No. 19], which added seven additional named plaintiffs (Cory Simpson, Meagan McGinley, Sandra GarrettDorsey, Brian Dering, Theresa Dering, Alan Armstrong, and Sandy Armstrong), four additional state subclasses (Maryland, New Jersey, Pennsylvania, and Washington), and four additional claims (violation of the Maryland Consumer Protection Act, violation of the New Jersey Consumer Fraud Act, violation of the Pennsylvania Unfair Trade Practices and Consumer Protection Law, and violation of the Washington Consumer Protection Act).

Defendant moved to dismiss the First Amended Class Action Complaint and strike its class allegations [ECF No. 30] on April 29, 2021. Plaintiffs filed their opposition memorandum [ECF No. 33] on May 27, 2021. And Defendant filed its reply brief [ECF No. 36] on June 17, 2021. While Defendant's motion was pending, the Parties engaged in substantial formal and informal discovery, including the production of more than 45,000 pages of documents by Defendant. *See* Declaration of Brian Warwick ("Warwick Decl."), Exhibit 1 hereto, at ¶4. On January 25, 2022, the parties jointly moved the Court to stay [ECF No. 46] the proceedings to allow the parties to attempt to resolve their dispute through mediation. The Court granted the motion [ECF No.47].

B. Negotiation of the Proposed Settlement

Prior to engaging in settlement talks, Class Counsel reviewed and analyzed the documents produced by Defendant and those obtained through their own considerable investigation; consulted with experts; spoke with hundreds of LeafFilter customers and numerous former employees and independent contractors; and considered the laws of the several States and the claims that could be asserted under those laws regarding LeafFilter Gutter Systems. Declaration of Jeffrey S. Goldenberg ("Goldenberg Decl."), Exhibit 2 hereto, at ¶6.

The resulting Settlement Agreement¹ was the product of negotiations during which the Parties analyzed their risks in the prosecution and defense of this case and came to a mutually acceptable compromise under the guidance of an experienced neutral, Hunter Hughes, Esq.² The mediation process was extended, at times contentious, and always adversarial. Warwick Decl., ¶7. The Parties advised the Court in multiple Joint Status Reports [ECF Nos. 48, 50, and 52] that they were continuing to work on the details of the proposed settlement and, in fact, as late as June 3, 2022, reported that there was a possibility that they would not be able to reach final agreement [ECF No. 52]. Ultimately, with Mr. Hughes' assistance, the mediation process was successful.

C. The Settlement Agreement

The relief provided by this Settlement Agreement is directed at debris accumulation, the common problem that unites the Settlement Class. *See* ECF No. 19 at, *e.g.*, ¶1 (alleging a latent defect exists in the LeafFilter Gutter System that causes “debris to accumulate on top of the LeafFilter system that must be cleaned off by the homeowner”). If a LeafFilter customer complains about debris and requests a service call, a LeafFilter representative will come to the customer's home and remove any debris on top of the LeafFilter Gutter System, a service for which it normally charges \$95. Declaration of Rocco Mango (“Mango Decl.”) [ECF No. 54-10], ¶8. Under the Settlement, LeafFilter has agreed to provide each Settlement Class Member fully transferrable vouchers for up to three future debris cleanings (total value \$285) at no cost, or reimbursement for up to \$200 in out-of-pocket expenses previously incurred.

Settlement Class Members can select one (1) of the following forms of relief:

¹ Settlement Agreement, Ex. 1 to the Memorandum in Support of the Motion for Preliminary Approval [ECF No. 54-2] (hereafter “Settlement Agreement”).

² This Court has previously observed that Mr. Hughes is “a nationally respected mediator.” *Kapik v. Huntington Bancshares Inc.*, 2021 WL 757123, at *1 (S.D. Ohio Feb. 18, 2021).

Benefit 1: Reimbursement of up to \$200 for two prior Debris Removal Cleanings. Claims for reimbursement shall be supported by Proof of Expense demonstrating that the Settlement Class Member paid out-of-pocket money to specifically remove Debris Accumulation. The maximum amount of each individual reimbursement is not to exceed \$100, and the total amount of reimbursement shall not exceed \$200.

Benefit 2: Reimbursement of up to \$100 for one prior Debris Removal Cleaning, and Vouchers for two future Debris Removal Cleanings. Claims for reimbursement shall be supported by Proof of Expense demonstrating that the Settlement Class Member paid out-of-pocket money to specifically remove Debris Accumulation. The maximum amount of such reimbursement is not to exceed \$100. Settlement Class Members will also receive two, fully transferrable Vouchers for future Debris Removal Cleanings.

Benefit 3: Vouchers for three future Debris Removal Cleanings. Settlement Class Members will receive three, fully transferrable Vouchers for future Debris Removal Cleanings.

Benefit 4: Reimbursement of up to \$200 for costs related to the removal of the LeafFilter Gutter System because of Debris Accumulation problems. Claims for reimbursement shall be supported by Proof of Expense demonstrating that the Settlement Class Member paid out-of-pocket money to remove the LeafFilter Gutter System.

In addition to these payments and vouchers, the Settlement Agreement requires Defendant to pay class notice and settlement administration costs, an award of reasonable attorneys' fees to Class Counsel, reimbursement of reasonable costs and expenses to Class Counsel, and any service award to the named Plaintiffs.

II. ATTORNEYS' FEES

A. Class Counsel's Attorneys' Fee and Expense Reimbursement Request is Authorized by the Settlement Agreement

Rule 23(h) of the Federal Rules of Civil Procedure expressly authorizes a court to award “reasonable attorney’s fees and nontaxable costs that are authorized by law or by the parties’ agreement.” Through the Settlement Agreement, LeafFilter has agreed to pay Class Counsel “reasonable attorneys’ fees and expense reimbursement ... as approved by the Court, and as consistent with the provisions of this Settlement Agreement.” Settlement Agreement, ¶6.3. Notably, LeafFilter did not agree to pay a specific amount and the Settlement Agreement does not contain a “clear sailing” provision. Instead, Class Counsel agreed “to request an aggregate award of attorneys’ fees and expenses not to exceed \$1,775,000.” *Id.*

B. Class Counsel’s Attorneys’ Fee Request is Fair and Reasonable

“When awarding attorney’s fees in a class action, a court must make sure that counsel is fairly compensated for the amount of work done as well as for the results achieved.” *Rawlings v. Prudential-Bache Props., Inc.*, 9 F.3d 513, 516 (6th Cir. 1993). “District courts apply a two-part analysis to assess the reasonableness of an attorney fee petition.” *O’Donnell v. Financial American Life Ins. Co.*, 2018 WL 11357092, at *5 (S.D. Ohio Aug. 24, 2018). “First, the court must determine the appropriate method to calculate the fees, using either the percentage of fund or the Lodestar approach.” *Id.* “Second, the Court must consider six factors to assess the reasonableness of the fee.” *Id.* (citing *Moulton v. U.S. Steel Corp.*, 581 F.3d 344, 352 (6th Cir. 2009)). Plaintiffs’ “all in” request for attorneys’ fees and expense reimbursement of \$1,775,000 is reasonable under both methods.

1. Class Counsel’s fee request is reasonable under the percentage of the benefit analysis

In *Gascho v. Global Fitness Holdings*, 822 F.3d 269, 278 (6th Cir. 2016), the Sixth Circuit relied on “ample precedent in our circuit and decisions from multiple other circuits” to conclude

“it is within the discretion of the district court ... if choosing to use or include a percentage of the fund calculation, to value the benefit to the class based on the total relief class counsel makes available to all the class members.” *Id.* at 278. Just as here, *Gascho* was a claims-made settlement with no true “fund” from which claims were to be paid. *Gascho* found that a district court may properly use the percentage of the fund method in such a circumstance because “[t]here is no meaningful distinction between a fund with a reversion provision and a defendant-paid-claims process, as here. In both cases, unclaimed funds wind up with the defendant.” *Id.* at 286.³ Therefore, a percentage analysis is appropriate here.

“When conducting a percentage of the fund analysis, courts must calculate the ratio between attorney’s fees and benefit to the class.” *Gascho*, 822 F.3d at 282. “Attorney’s fees are the numerator and the denominator is the dollar amount of the Total Benefit to the class (which includes the ‘benefit to class members,’ the attorney’s fees and may include costs of administration).” *Id.* *Gascho* noted that “the [Supreme] Court has held that class plaintiffs’ ‘right to share the harvest of the lawsuit upon proof of their identity, *whether or not they exercise it*, is a benefit in the fund created by the efforts of class representatives and their counsel.” *Id.* (quoting *Boeing Co. v. Van Gemert*, 444 U.S. 472, 480 (1980) (emphasis in original)).

“To determine the benefit to class members, a court generally looks to the amount made available to the class, rather than the amount ultimately claimed.” *O’Bryant*, 2021 WL 5016872,

³ Courts in the Sixth Circuit often use a percentage of the fund/ common benefit analysis in cases where the defendant agrees to create a settlement fund from which valid claims made by class members are paid, with any remaining funds reverting to the defendant. *See, e.g., Bourne v. Ansara Restaurant Group, Inc.*, 2016 WL 7405804 (E.D. Mich. Dec. 22, 2016) (awarding fees representing “a third of the potential gross recovery and creation of the common benefit fund” even though “the entire negotiated fund will not be paid under the settlement”); *O’Bryant v. ABC Phones of North Carolina, Inc.*, 2021 WL 5016872 (W.D. Tenn. Oct. 28, 2021) (percentage of the fund method appropriate where defendant creates a “Total Maximum Settlement Amount” of \$1,400,576.40, with unclaimed funds reverting to defendant).

at *5 (citing *Boeing*, 444 U.S. at 480-481; *Gascho*, 822 F.3d at 286). This is because “devaluing the available relief if it goes unclaimed could in many cases unduly penalize class counsel and have the lasting effect of discouraging the filing of class actions in cases where few claims are likely to be made but the deterrent effect of such a suit would be socially desirable.” *Gascho*, 822 F.3d at 284.

There are 57,704 class members covered by the Settlement (Goldenberg Decl., ¶18) who have the option to select up to \$200 in cash reimbursements, (Options 1 and 4), vouchers valued at \$285 (Option 3), or up to \$290 in a combination of reimbursement and vouchers (Option 2). Therefore, the value of the first component of the class benefit ranges between \$11,540,800 (57,704 x \$200) and \$16,734,160 (57,704 x \$290), depending on which option class members choose. *See Gascho*, 822 F.3d at 287 (rejecting argument that class benefit should be valued based upon actual claims made and noting the “foundational principle” that “there is value in providing a class member the ability to make a claim, whether she takes advantage of it or not”).

The second component of the class benefit is the requested award of attorneys’ fees and expenses, which is added to the first component to reach the total value to the class. *Gascho*, 822 F.3d at 282; *O’Bryant*, 2021 WL 5016872, at *5. Class Counsel here requests \$1,775,000 in combined fees and expenses, making the total benefit available to the class (not counting the costs of administration) valued at between \$13,315,800 and \$18,509,160.

When calculated as a percentage of the total benefit, the requested attorney’s fees and expenses represents between 9.6% and 13.3% of the total class benefit. These percentages are well below those typically approved in this Circuit, which “typically range from 20 to 50 percent.” *Connectivity Sys. Inc. v. National City Bank*, 2011 WL 292008, at *12 (S.D. Ohio Jan. 26, 2011) (citing *Brotherton v. Cleveland*, 141 F. Supp. 2d 894, 902 (S.D. Ohio 2001); *Arledge v. Domino’s*

Pizza, Inc., 2018 WL 5023950, at *4 (S.D. Ohio Oct. 17, 2018) (same); *Whiteamire Clinic, P.A. Inc. v. Cartridge World N. Am., LLC.*, 2021 WL 9124592, at *2 (N.D. Ohio Sept. 14, 2021) (fee awards of one-third “have been determined by courts in this Circuit to be within the range of reasonableness”); *Bourne*, 2016 WL 7405804, at *3 (awarding attorney fees equal to one-third of the potential gross recovery).⁴ Thus, the requested attorney fee and cost award is reasonable under a percentage of the benefit analysis.

2. Class Counsel’s fee requests is reasonable under a lodestar analysis

Although performing a cross-check on the percentage method using Class Counsel’s lodestar is optional, *Swigart v. Fifth Third Bank*, 2014 WL 3447947, at *6 (S.D. Ohio July 11, 2014), courts often perform a lodestar cross-check to ensure counsel does not receive a “windfall.” *In re Cardinal Health Inc. Sec. Litig.*, 528 F. Supp. 2d 752, 764 (S.D. Ohio 2007). The purpose of the exercise is “not to supplant the court’s detailed inquiry into the attorney’s skill and efficiency in recovering the settlement” using the percentage method, but instead merely to ensure that the fee award is still “roughly aligned with the amount of work the attorneys contributed.” *Id.* The Sixth Circuit has instructed that when “determining fee awards, courts should not ‘become green-eyeshade accountants,’ but instead must content themselves with ‘rough justice.’” *Waters v. Pizza to You, L.L.C.*, 2022 WL 3048376, at *6 (S.D. Ohio Aug. 2, 2022) (quoting *Rembert v. A Plus Home Health Care Agency LLC*, 986 F.3d 613, 618 (6th Cir. 2021) (internal punctuation altered)).

“The Court performs a lodestar cross-check by comparing the lodestar multiplier used in this case to lodestar multipliers used in similar cases.” *In re Cardinal Health Inc. Sec. Litig.*, 528 F. Supp. 2d at 767. Although a lodestar cross check is not required, “in the Southern District of

⁴ See also *In re Telectronics*, 137 F. Supp. 2d 1029, 1046 (S.D. Ohio 2001) (“the range of reasonableness has been designated as between twenty to fifty percent of the common fund”); *In re S. Ohio Corr. Facility*, 173 F.R.D. 205, 217 (S.D. Ohio 1997), *rev’d on other grounds*, 24 Fed. App’x 520 (6th Cir. 2001) (“[t]ypically, the percentage awarded ranges from 20 to 50 percent of the common fund”).

Ohio, the preferred method is to award a reasonable percentage of the fund, with reference to the lodestar and the resulting multiplier.” *Connectivity Sys. Inc.*, 2011 WL 292008, at *13.⁵

To determine an appropriate “lodestar” figure, a court first multiplies the number of hours reasonably expended on the litigation by a reasonable hourly rate. *Bldg. Serv. Local 47 Cleaning Contractors Pension Plan v. Grandview Raceway*, 46 F.3d 1392, 1401 (6th Cir. 1995) (quoting *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983)). The court may then adjust the “lodestar” to reflect relevant considerations peculiar to the subject litigation. *Adcock–Ladd v. Sec’y of Treasury*, 227 F.3d 343, 349 (6th Cir. 2000).

a. Class Counsel Reasonably Expended Over 1,500 Hours.

Class Counsel handled this litigation in an efficient, streamlined manner. Class Counsel maintained contemporaneous and detailed time records, which include a detailed description of all expenses incurred and work performed. As reflected in the attached billing records, the total hours reasonably expended by Class Counsel during the nearly two years that this litigation has been pending is 1,610.7. *See* Goldenberg Decl., ¶11, Exhibit 1; Warwick Decl., Exhibit 1.

Moreover, although they do not seek compensation for future time, Class Counsel will conduct significant additional work following this filing. In addition to fielding calls from class members, Class Counsel will respond to objectors, prepare for and present at the fairness hearing, address any appeals, and oversee the administration of the Settlement. *See Estate of McConnell v. EUBA Corp.*, 2021 WL 1966062, at *7 (S.D. Ohio May 17, 2021) (“The Court is aware that Class Counsel’s work does not end at final approval. Class Counsel frequently spend additional time,

⁵ *See also In re Teletronics Pacing Sys., Inc.*, 186 F.R.D. 459, 483 (S.D. Ohio 1999), *rev’d on other grounds*, 221 F.3d 870 (6th Cir. 2000); *Brotherton*, 141 F. Supp. 2d at 902; *Van Horn v. Nationwide Prop. & Cas. Ins. Co.*, 2010 WL 1751995, at *2 (N.D. Ohio Apr. 30, 2010) (noting that a “cross check” is often used); *Chesher v. Neyer*, 2007 WL 4553908, at *2 (S.D. Ohio Dec. 19, 2007) (“The Court find[s] that in this case a reasonable fee award is best determined using the percentage of the fund method as requested by Plaintiffs’ Counsel, using the lodestar method as a check on the reasonableness of the award.”).

sometimes significant time, dealing with class members' inquiries, administration issues, and other post-approval matters.'').

b. Class Counsel's Hourly Rates are Reasonable

Class Counsel's requested rates are also reasonable. "It is well-established that a district court has broad discretion to determine what constitutes a reasonable hourly rate for an attorney." *Amos v. PPG Industries, Inc.*, 2019 WL 3889621, at *12–13 (S.D. Ohio Aug. 16, 2019), *report and recommendation adopted*, 2019 WL 3980570 (S.D. Ohio Aug. 22, 2019) (quoting *American Broadcasting Companies, Inc. v. Brunner*, 2008 WL 11450441, at *10 (S.D. Ohio Sept. 30, 2008) (citations omitted)). "Courts should look to the prevailing market rate in the community for similar services by lawyers of reasonably comparable skill, experience, and reputation." *Id.* See Declaration of W.B. Markovits ("Markovits Decl."), Exhibit 3 hereto, ¶¶9-10 (attesting to the reasonableness of Class Counsel's rates in the Southern District of Ohio legal community for lawyers of comparable skill, experience, and reputation). "In ascertaining the proper 'community,' district courts may 'look to national markets, an area of specialization, or any other market they believe is appropriate to fairly compensate attorneys in individual cases.'" *Amos*, 2019 WL 3889621, at *12 (quoting *Lowther v. AK Steel Corp.*, 2012 WL 6676131, at *4 (S.D. Ohio Dec. 21, 2012); *McHugh v. Olympia Entertainment, Inc.*, 37 F. App'x 730, 740 (6th Cir. 2002)). "Because the market rate for attorneys varies, 'the Court may look to other indicia of reasonableness, principally the attorney's customary billing rate.'" *Amos*, 2019 WL 3889621, at *13 (quoting *Dowling*, 2008 WL 906042, at *1 (citation omitted)).

Class Counsel's customary billing rates — ranging from \$450 to \$700 for attorneys and \$150 to \$220 for paralegals and staff — reflect rates that are normally charged by Class Counsel for work of this nature and that have been approved by prior courts, included those within the Sixth

Circuit. *See* Goldenberg Decl., ¶8; Warwick Decl., ¶16; *see also Waters*, 2022 WL 3048376, at *6 (looking to class counsel’s hourly rates as approved by other courts); *Smith v. Local Cantina, LLC*, 2022 WL 1183325, at *5 (S.D. Ohio April 19, 2022) (approving rates that “have been approved for these timekeepers in other cases”).

In *O’Donnell*, this Court found Goldenberg Schneider, LPA possessed “extensive experience in class action litigation” and that the firm’s 2018 billing rates in that case were “reasonable.” *O’Donnell*, 2018 WL 11357092, at *5-6 (citing ECF No. 131-2 [Naylor Declaration listing 2018 billing rates as \$595 for Jeffrey S. Goldenberg, \$550 for Todd B. Naylor, \$485 for Robert B. Sherwood, \$150 for Stephanie Vaaler, and \$100 for Cheryl Pence]). Goldenberg Schneider’s current billing rates⁶ reflect an approximately 4-5% annual cost-of-living increase over these rates: \$700 for Jeffrey S. Goldenberg, \$650 for Todd B. Naylor, \$600 for Robert B. Sherwood, \$175 for Stephanie Vaaler, and \$150 for Cheryl Pence. Notably, in 2021, Judge Matthew W. McFarland approved a common fund fee request with a lodestar cross check using Goldenberg Schneider’s rates as \$675 for Jeffrey S. Goldenberg, \$625 for Todd B. Naylor, and \$150 for Cheryl Pence. *See Farris v. U.S. Fin. Life Ins. Co.*, S.D. Ohio. No. 1:17-cv-417, ECF Nos. 74 [Order], 71-4 [Goldenberg Declaration]. Application of a 4-5% annual cost-of-living increase on Goldenberg Schneider’s 2021 rates results in rates at or above those sought here.

Notably, in other jurisdictions, Goldenberg Schneider’s professionals have often been approved at higher hourly rates. For example, Mr. Goldenberg was approved at \$750 per hour and Ms. Pence was approved at \$150 per hour in *Sarah Hill et al v. Canidae Corporation*, C.D.

⁶ “The Court may approve fees computed on current rates to adjust for the delay in compensation because the fees will be ‘received several years after services were rendered.’” *Lowther*, 2012 WL 6676131, at *5 (quoting *Barnes v. City of Cincinnati*, 401 F.3d 729, 745 (6th Cir. 2005)).

Cal. No. 5:20-cv-01374-JGB-SP, ECF No. 79. On April 22, 2021, Goldenberg Schneider submitted the following hourly rates to a federal district court in New Jersey to support Class Counsel's fee petition: Jeffrey Goldenberg: \$775; Todd Naylor: \$700; Robert Sherwood: \$650; and Cheryl Pence: \$150. *See In Re: Mercedes-Benz Emission Litigation*, D. N.J. No. 2:16-cv-00881-KM-ESK, ECF No. 312-2, Ex. 4. The Court granted Class Counsel's fee petition on July 12, 2021. *Id.*, ECF No. 341. On December 3, 2021, Goldenberg Schneider submitted the following hourly rates to a federal district court in the Southern District of New York to support Class Counsel's fee petition: Jeffrey Goldenberg: \$750; Todd Naylor: \$675; Robert Sherwood: \$625; Stephanie Vaaler: \$175; and Cheryl Pence: \$150. *See Culbertson v. Deloitte Consulting LLP*, S.D.N.Y. No. 1:20-cv-3962-LJL, ECF No. 146. The Court granted Class Counsel's fee petition on February 16, 2022. *Id.*, ECF No. 159.

Counsel from the Varnell & Warwick firm have been similarly approved by federal courts at the hourly rates presented. *See, e.g., Ioime v. Blanchard, Merriam, Adel & Kirkland, P.A.*, M.D. Fla. No. 5:15-cv-13O-JSM-PRL, ECF Nos. 48 (approving attorneys' fees at \$600/hour for Brian W. Warwick and \$650/hour for Janet R. Varnell); *Inetianbor v. Cashcall, Inc.*, S.D. Fla. No. 0:13-cv-60066-JIC, ECF No. 326 (approving attorney fee at \$600/hour for Brian W. Warwick and Janet R. Varnell); *Altamonte Pediatrics, P.A. v. Greenway Health, LLC*, N.D. Ga. No. 1:2021-cv-03116-TCB, ECF No. 260 (approving attorney fee at \$650/hour for Janet R. Varnell and \$450/hour for Erika R. Willis); Warwick Decl., ¶10.

Plaintiffs and the Class Members are represented by law firms with specialized, national practices. Therefore, this Court may freely select the most appropriate rate. *See McHugh v. Olympia Entm't, Inc.*, 37 F. App'x. 730, 740 (6th Cir. 2002). Class Counsel's rates are reasonable, particularly given the national scope of the Class Settlement and Class Counsel's

practices, Class Counsel's experience litigating similar class actions, and the fact that Class Counsel have been previously approved at similar rates by courts in the Southern District of Ohio or elsewhere. Markovits Decl, ¶¶ 9-10 (attesting to reasonableness of Class Counsel's rates).

c. A Lodestar Multiplier of 2.18 is Appropriate

The total lodestar for Class Counsel's time in this case is \$802,455. Goldenberg Decl., ¶ 12. However, trial judges are permitted to adjust the lodestar to reflect relevant considerations peculiar to the subject litigation. *Adcock-Ladd*, 227 F.3d at 349. The *Bowling* court explained that the lodestar calculation can be adjusted *upward* through application of a multiplier to account for additional factors such as the contingent nature of the case and the quality of an attorney's work. *Bowling*, 922 F.Supp. at 1278 (citing the Report of the Third Circuit Task Force, 108 F.R.D. 237, 242 (1986)). As discussed above, the particular legal issues involved in this case created the very real risk at the outset that Class Counsel would not be paid at all. *See Connectivity Sys. Inc.*, 2011 WL 292008, at *14 ("[P]erhaps the foremost of these factors [justifying a multiplier] is...the fact that, despite the most vigorous and competent efforts, success is never guaranteed." (internal quote omitted)). Here, Class Counsel's requested fee of \$1,749,416.31 represents a 2.18 multiplier on their lodestar. "Because of the inherent risks of litigation, courts in this district award multipliers of between 2.0 and 5.0." *Karpik v. Huntington Bancshares Inc.*, 2021 WL 757123, at *8 (S.D. Ohio Feb. 18, 2021) (quotation omitted). "Awards of common-fund attorney fees in amounts two to three-times greater than the lodestar have been found reasonable." *Myers v. Memorial Health System Marietta Memorial Hospital*, 2022 WL 4079559, at *6 (S.D. Ohio Sep. 6, 2022) (collecting cases); *Rudi v. Wexner*, 2022 WL 1682297, at *5 (S.D. Ohio May 16, 2022) ("2.75 multiplier falls at the low end of that reasonable range").

3. Class Counsel's Fee Request is Reasonable under the *Ramey* Factors.

The Sixth Circuit “require[s] only that awards of attorney’s fees in common fund cases be reasonable under the circumstances.” *Rawlings*, 9 F.3d at 516. Accordingly, the Court must provide a concise and clear explanation of the reasoning for adopting a particular method and the factors considered to arrive at the fee. *Hensley*, 461 U.S. at 437; *Rawlings*, 9 F.3d at 516. The Sixth Circuit has adopted the following factors (often referred to as the *Ramey* factors) to consider when determining what constitutes a reasonable fee in a common fund case:

- 1) the value of the benefit rendered to the plaintiff class (i.e. the results achieved);
- 2) society’s stake in rewarding attorneys who produce such benefits in order to maintain an incentive to others;
- 3) whether the services were undertaken on a contingent fee basis;
- 4) the value of the services on an hourly basis [the lodestar cross-check];
- 5) the complexity of the litigation; and
- 6) the professional skill and standing of counsel involved on both sides.⁷

Each factor supports Class Counsel’s fee request in this case.

a. The Results Achieved in this Litigation

The first *Ramey* factor requires the Court to evaluate the benefit of the settlement to the class and is often cited as the most important factor. *Bowling*, 922 F.Supp. at 1280. The Settlement Class includes a limited and specific subset of LeafFilter customers who share two defining features: (1) they all had debris building up on top of their LeafFilter Gutter System; and (2) they all had LeafFilter open a service ticket relating to Debris Accumulation. The relief provided by the proposed Settlement is targeted to the exact issue experienced by these customers – Debris Accumulation. See Settlement Agreement, Section 4. This is not a settlement that offers a mere

⁷ *Swigart*, 2014 WL 3447947, at *6 (citing *Ramey v. Cincinnati Enquirer, Inc.*, 508 F.2d 1188, 1196 (6th Cir. 1974), *cert. denied*, 422 U.S. 1048 (1975)).

token of value to claimants. Class Members may receive up to \$200 in cash reimbursements, three fully transferrable vouchers for debris cleanings worth \$285, or up to \$100 in cash reimbursement and two vouchers for a total value of \$290.

Notably, Defendant possessed substantial defenses to the merits of the claims at issue, both at the trial court level and on appeal. LeafFilter has vehemently denied Plaintiffs' claims and has consistently maintained that the allegations lack merit. Specifically, LeafFilter's warranty language purports to limit its liability to circumstances where the interior of the gutters are clogged. There is no warranty language addressing Debris Accumulation. And, this Court has not yet ruled on the pending motion to dismiss. Thus, given the risk of proceeding, the value obtained from bringing, prosecuting, persevering, and settling this litigation should not be underestimated. Moreover, in addition to the inherent risk as to the outcome, achieving a result that resolves this litigation *now* is valuable in that it avoids the certain delay of continuing litigation with the possibility of appeals. The delay in the process alone, regardless of result, would be of great detriment to the class. *See Connectivity Sys. Inc.*, 2011 WL 292008, at *4 ("Given the time value of money, a future recovery, even one greater than the proposed Settlement Amount, may be less valuable to the Settlement Class than receiving the benefits of the Settlement Agreement now."). This first factor supports the requested attorney fee award.

b. The Requested Fee Provides Adequate Incentive to Undertake this Representation for the Benefit of Others

Awarding Class Counsel the requested attorney fee amount provides an incentive for qualified and experienced attorneys to undertake this type of speculative and risky litigation in the future, which serves as an important check against exploitation of consumers.⁸ Thus, "class

⁸ *See, e.g., Wes v. Storey*, 2011 WL 1463609, at *11 (S.D. Ohio Apr. 14, 2011) ("there is a public interest in ensuring that attorneys willing to represent low-income persons in ... consumer protection cases are adequately paid so that they and others like them will continue to take on such cases") (citing *Bateman*

counsel's expenditure of time and money benefitted small claimants who lack the resources to prosecute a case of this nature.” *Hainey v. Parrott*, 2007 WL 3308027, at *3 (S.D. Ohio Nov. 6, 2007). Without counsel willing to take the risk of challenging companies like LeafFilter, Plaintiffs would have been left with no recourse since the cost to pursue their individual claim far exceeded their damages. *Myers*, 2022 WL 4079559 at *6 (“Society has a stake in rewarding attorneys who achieve a result that the individual class members probably could not obtain on their own.” (quoting *Kritzer v. Safelite Solutions, LLC*, 2012 WL 1945144, at *9 (S.D. Ohio May 30, 2012)); *Karpik*, 2021 WL 757123, at *8 (“Without a class action, the individual plaintiffs would not have had a strong incentive to pursue recovery because any monetary award would have been severely outweighed by the costs to litigate their cases.”). This second factor also supports the requested attorney fee award.

c. Class Counsel Undertook this Representation on a Contingent Basis

The third *Ramey* factor “stands as a proxy for the risk that attorneys will not recover compensation for the work they put into a case.” *In re Cardinal Health Inc. Sec. Litig.*, 528 F. Supp. 2d at 765 (citing *Bowling*, 922 F.Supp. at 1282). Some courts consider the risk of non-recovery to be the most important factor in the fee determination. *Id.* (citing cases).

Class Counsel agreed to undertake this litigation on a contingent basis. *See* Goldenberg Decl. at ¶14. Class Counsel advanced all costs (which presently total \$25,583.69) (*id.* at ¶13) and have received no compensation for the work they have performed over the past two years. Moreover, had there been no recovery, Class Counsel would not have been paid a fee or reimbursement of their expenses. This factor supports Class Counsel's fee request. *See Bartell v. LTF Club Operations Company, Inc.*, 2020 WL 7062834, at *6 (S.D. Ohio Aug. 7, 2020).

Eichler, Hill Richards, Inc. v. Berner, 472 U.S. 299, 310 (1985)).

d. The Hourly Value of the Services Supports the Fee Requested

Pursuant to the fourth *Ramey* factor, the Court must examine the value of the attorney's services on an hourly basis. Class Counsel spent over 1,600 hours through November 4, 2022 prosecuting this litigation, and will spend further uncompensated time from this point to conclusion. *See* Goldenberg Decl. at ¶11; *Arp v. Hohla & Wyss Enterprises, LLC*, 2020 WL 6498956 *7 (S.D. Ohio Nov. 5, 2020) (noting class counsel often spends time after final approval). Class Counsel's cumulative lodestar to date totals \$802,455. *See* Goldenberg Decl. at ¶12. The value of that service is outlined above in the description of the results achieved and in Section II(B)(2) above relating to the lodestar cross-check analysis. Based upon the results obtained through this settlement, the class received an excellent value for the time spent by Class Counsel.

e. The Complexity of the Litigation Supports the Requested Fee

The fifth *Ramey* factor requires the Court to consider the complexity of the case. This case involved nearly two years of litigation against a Defendant committed to vehemently denying all claims against it. The product was also sold through potentially individualized at-home presentations made by different salespeople, which could make certification of contested class difficult. A zero recovery for the Plaintiffs and the Class was certainly possible. Class Counsel accepted these risks, diligently prosecuted the case, and negotiated a meaningful and substantial recovery for the entire class. This factor also supports the fee request.

f. The Professional Skill of Counsel on both sides Supports the Requested Fee

The last *Ramey* factor addresses the professional skill of counsel. Here, Class Counsel has substantial experience representing plaintiffs in class action consumer litigation, which was central to the success achieved through this settlement. Class Counsel Jeffrey Goldenberg has been practicing law for 28 years and devotes his practice entirely to complex litigation, including

consumer class action litigation, on a national basis. *See* Goldenberg Decl. at ¶4. Similarly, Class Counsel Brian Warwick has over 22 years of experience litigating consumer class actions across the country. *See* Warwick Decl., ¶12. Defendant, on the other hand, was represented by experienced counsel from one of Ohio's premier firms. Class Counsel's professionalism and skill litigating this matter also supports the requested fee. *See Bartell*, 2020 WL 7062834, at *7 ("the hours expended and time records submitted by Class Counsel further underscore their competency and efficient handling of this matter, favoring approval").

g. The Fee Request is Supported by the Named Plaintiffs

Bolstering the foregoing considerations, the Named Plaintiffs support the payment of fees and expenses as requested in the instant motion.⁹ A fee representing approximately 9.6-13.3% of the \$13,315,800 to \$18,509,160 common benefit is fair and reasonable and is within the range established in the Sixth and other Circuits and by the District Courts in Ohio.

III. EXPENSES

"[C]lass counsel is entitled to reimbursement of all reasonable out-of-pocket expenses and costs in the prosecution of claims, and in obtaining settlement, including but not limited to expenses incurred in connection with document productions, consulting with and deposing experts, travel and other litigation-related expenses." *Karpik*, 2021 WL 757123, at *9 (quoting *In re: Cardizem CD Antitrust Litig.*, 218 F.R.D. 508, 534-535 (E.D. Mich. 2003)). "[T]he categories of expenses for which Plaintiffs' counsel seek reimbursement are the type routinely charged to hourly fee-paying clients and thus should be reimbursed out of the settlement fund ... [including] the cost

⁹ *See* Declaration of James Zilinsky ("J. Zilinsky Decl."), ¶¶8-12; Declaration of Geraldine Zilinsky ("G. Zilinsky Decl."), ¶¶8-12; Declaration of Cory Simpson ("Simpson Decl."), ¶¶8-12; Declaration of Meagan McGinley ("McGinley Decl."), ¶¶8-12; Declaration of Sandra GarrettDorsey ("GarretDorsey Decl."), ¶¶8-12; Declaration of Brian Dering ("B. Dering Decl."), ¶¶8-12; Declaration of Theresa Dering ("T. Dering Decl."), ¶¶8-12; Declaration of Alan Armstrong ("A. Armstrong Decl."), ¶¶8-12; Declaration of Sandy Armstrong ("S. Armstrong Decl."), ¶¶8-12 (collectively filed as Exhibit D, hereto).

of experts and consultants ... computerized research; travel and lodging expenses; photocopying cost; filing and witness fees; postage and overnight delivery; and the cost of court reporters and depositions.” *New Eng. Health Care Emples. Pension Fund v. Fruit of the Loom, Inc.*, 234 F.R.D. 627, 635 (W.D. Ky. 2006) (approving expenses submitted pursuant to these categories).

To date, Class Counsel has incurred \$25,583.69 in costs and expenses. Goldenberg Decl. at ¶13. Each expense for which Class Counsel seeks reimbursement was necessary and directly related to this litigation. *Id.*; Warwick Decl. at ¶19. Accordingly, Class Counsel is entitled to this expense reimbursement.

IV. SERVICE AWARDS

The Settlement Agreement also provides that Class Counsel will request service awards for the Named Plaintiffs not to exceed \$3,500 per household. *See* Settlement Agreement, Section VI. Each Named Plaintiff assisted Class Counsel in prosecuting and settling this litigation.¹⁰ Therefore, Class Counsel respectfully submits that the Named Plaintiffs should be compensated for their important role in representing the class, and that this Court should approve the negotiated payment of a \$3,500 service award to each Named Plaintiff household (\$3,500 to James and Geraldine Zilinsky, \$3,500 to Cory Simpson and Meagan McGinley, \$3,500 to Sandra GarrettDorsey, \$3,500 to Brian and Theresa Dering, and \$3,500 to Alan and Sandy Armstrong).

Class Counsel moves for the approval of the service award for the Named Plaintiffs in this case under principles of equity and the prior practice and case law in the Ohio District Courts. “Service ‘awards are efficacious ways of encouraging members of a class to become class representatives and rewarding individual efforts taken on behalf of the class.’” *Rudi*, 2022 WL

¹⁰ J. Zilinsky Decl., ¶¶4-7; G. Zilinsky Decl., ¶¶4-7; Simpson Decl., ¶¶4-7; McGinley Decl., ¶¶4-7; GarretDorsey Decl., ¶¶4-7; B. Dering Decl., ¶¶4-7; T. Dering Decl., ¶¶4-7; A. Armstrong Decl., ¶¶4-7; S. Armstrong Decl., ¶¶4-7.

1682297, at *5 (quoting *Hadix v. Johnson*, 322 F.3d 895, 897 (6th Cir. 2003)). At the inception of this action, the Named Plaintiffs indicated their desire and willingness to undertake the responsibilities and fiduciary duties on behalf of the class.¹¹ This is a voluntary obligation that goes well beyond the pursuit of their individual claims. The Named Plaintiffs remained in close contact with Class Counsel, prior to the case filing and throughout the litigation; they reviewed the complaints and court filings, responded to discovery requests, and approved the Settlement.¹² Without their willingness to undertake these obligations on behalf of more than 55,000 class members, the recovery in this case would not have occurred.

Moreover, the \$3,500 service award is modest and reasonable in view of prior awards by district courts in this Circuit. *See, e.g., Karpik*, 2021 WL 757123, at *10 (approving \$7,500 service award to each class representative); *Rudi*, 2022 WL 1682297, at *5 (approving \$10,000 service awards). Plaintiffs respectfully request that the Court grant a service award of \$3,500 to each Named Plaintiff household for their time and work on this case on behalf of all Class Members.

V. CONCLUSION

Based upon the foregoing, Class Counsel respectfully requests this Court approve the payment of (1) \$1,749,416.31 as reasonable attorneys' fees; (2) \$25,583.69 as reimbursement of the expenses necessarily incurred in prosecution of this action; and (3) \$3,500 service awards for each Named Plaintiff household.

Respectfully submitted,

/s/ Jeffrey S. Goldenberg

Jeffrey S. Goldenberg (0063771)

Todd B. Naylor (0068388)

¹¹ J. Zilinsky Decl., ¶¶3-5, 11; G. Zilinsky Decl., ¶¶3-5, 11; Simpson Decl., ¶¶3-5, 11; McGinley Decl., ¶¶3-5, 11; GarretDorsey Decl., ¶¶3-5, 11; B. Dering Decl., ¶¶3-5, 11; T. Dering Decl., ¶¶3-5, 11; A. Armstrong Decl., ¶¶3-5, 11; S. Armstrong Decl., ¶¶3-5, 11.

¹² *Id.*

GOLDENBERG SCHNEIDER, LPA

4445 Lake Forest Drive, Suite 490

Cincinnati, OH 45242

Telephone: (513) 345-8291

Facsimile: (513) 345-8294

Email: jgoldenberg@gs-legal.com

tnaylor@gs-legal.com

Janet R. Varnell*

Matthew Peterson*

Brian Warwick*

VARNELL & WARWICK

1101 E. Cumberland Avenue

Suite 201H, #105

Tampa, FL 33602

Telephone: (352)753-8600

Email: jvarnell@varnellandwarwick.com

mpeterson@varnellandwarwick.com

bwarwick@varnellandwarwick.com

* Admitted *Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Jeffrey S. Goldenberg

Jeffrey S. Goldenberg

3. Thereafter, on April 1, 2021, Plaintiffs filed a First Amended Complaint

incorporating all claims made in the initial Complaint while also adding additional named plaintiffs and corresponding claims under their respective state laws. The additional Plaintiffs were Cory Simpson and Megan McGinley from Maryland, Sandra GarrettDorsey from New Jersey, Brian and Theresa Dering from Pennsylvania, and Alan and Sandy Armstrong from Washington.

4. Throughout the remainder of 2021, the parties engaged in class discovery, including the production of approximately 45,000 documents from LeafFilter.

5. At the beginning of 2022, the parties agreed to attend mediation and Class Counsel spent the weeks leading up to the mediation requesting and analyzing information related to potential class definitions and determining actual damages. In order estimate damages prior to mediation, Class Counsel reviewed extensive amounts of discovery provided by Defendants and consulted with an expert.

6. On March 17, 2022, the parties attended a full-day mediation with experienced class action Mediator, Hunter Hughes in Atlanta, Georgia. Mediation resulted in the parties signing a basic term sheet outlining the overall structure and terms of this class action settlement. *Id.*

7. After reaching an agreement in principle, the parties held multiple conference calls and submitted numerous drafts of the Settlement Agreement and supporting documents. There were several points of clarification and dispute that took substantial effort on both sides to resolve. The mediation process was at times contentious and always adversarial. In fact, the formal Settlement Agreement was only fully executed on June 24, 2022. The Agreement was filed with and described in detail in Plaintiff's Memorandum of Law in Support of Preliminary Approval.

8. Since notice was issued to the class, myself and lawyers within my firm have fielded calls from numerous class members regarding the details of the settlement. I have assisted

in filing claims and have advised when class members should opt out of the case.

9. I have also participated in preparing the briefing in support of preliminary approval.

10. Although V&W has been awarded attorney fees many times under a common fund type analysis, several courts have approved class action attorney fees based upon lodestar. Because most of these cases were settlement classes, several orders approved the hourly rates set forth in the chart below, without any specific analysis of why the rates were approved. Instead, the Court simply approved the attorney fees as a whole and at the rates listed.

V&W Class Action Matters – 2015-2022	
CASE	HOURLY RATE
<i>Bryant v. World Imports U.S.A., Inc., d/b/a World Imports</i> , In the Circuit Court of Duval County, Florida, 2015-CA-005185	BWW - \$550
<i>Baez v. LTD Financial Services, LLP</i> , Middle District of Florida, 6:15-cv-1043	BWW - \$450
<i>Chau v. Cabat Properties, LLC</i> , In the Circuit Court of Leon County, Florida, 2014-CA-1241	BWW - \$500
<i>Ebreo v. Vystar Credit Union</i> , In the Circuit Court of Duval County, 16-2014-CA-00365	BWW - \$500 JRV - \$500
<i>Inetianbor v. Cashcall, Inc. and John Paul Reddam</i> , In the United States District Court, Southern District of Florida, 13-60066-CIV-COHN-SELTZER	JRV - \$600 BWW - \$600
<i>Gagnon v. Kia Autosport of Pensacola, Inc., et al.</i> , In the Circuit Court of Escambia County, Florida, 2014-CA-000084	BWW - \$500
<i>Holt v. HHH Motors, Inc.</i> , In the Circuit Court of Duval County, Florida, 2012-CA-010179	BWW - \$500 JRV - \$500
<i>Ioime, et al., v. Blanchard, Merriam, Adel & Kirkland, P.A.</i> , In the United States District Court, Middle District of Florida, 5:15-cv-13-Oc-30PRL	BWW - \$600 JRV - \$650

<i>Kilby, et al., v. Camaron at Woodcrest, LLC, et al.</i> , In the Circuit Court of Leon County Florida, 2013-CA-001300	BWW - \$500
<i>Magann v. Datafile Technologies, L.L.C.</i> , In the Circuit Court of Hillsborough County, 14-CA-007395	BWW - \$500
<i>Prindle v. Carrington Mortgage Services, LLC</i> , United States District Court, Middle District of Florida, 3:13-cv-01349;	JRV - \$350 BWW - \$350
<i>Riley v Home Retention Services, Inc. et al.</i> , United States District Court, Southern District of Florida, 2014-CV-20106	JRV - \$450 BWW - \$450
<i>Tate v. Navy Federal Credit Union</i> , In the Circuit Court of Duval County, Florida, 14-CA-000756	BWW - \$500 JRV - \$500
<i>Wood, Atter & Wolf, P.A. v. Record Reproduction Service, Inc.</i> , In the Circuit Court of Duval County, Florida, 2015-CA-00763	BWW - \$500 JRV - \$500
<i>Wood, Atter & Wolf, P.A. v. University of Florida Jacksonville Physicians, Inc.</i> , In the Circuit Court of Duval County, Florida, 16-2014-CA-005771	BWW - \$500 JRV - \$500
<i>Altamonte Pediatrics, P.A. v. Greenway Health, LLC</i> , United States District Court, Northern District of Georgia	JRV - \$650 ERW - \$450

11. Varnell & Warwick also employs Janet R. Varnell, Matthew Peterson, and Erika Willis as attorneys practicing in complex consumer litigation. I was the supervising attorney on this case and oversaw the work of the lawyers within my firm. I also reviewed the time records of my firm and adjusted for duplication or what I believed to be excessive time.

12. I received a Bachelor's degree in Finance from the College of St. Francis in Joliet, Illinois in 1994. In 1999, I received my Juris Doctorate degree from Cumberland School of Law and my Master's in Business Administration from Samford University in Birmingham, Alabama. After graduation, I served as Law Clerk to the Honorable Champ Lyons, Jr. on the Alabama Supreme Court. Along with my partner, Janet Varnell, I received the "2018 Trial Lawyer of the

Year Award” from the Public Justice Foundation in Washington D.C., for our class action work against a pay-day lender.

13. Attorney Janet R. Varnell received her Bachelor’s degree in computational neurobiology from Eckerd College (1991). She earned her Juris Doctorate degree from Florida State University College of Law, with high honors (1995). Ms. Varnell was awarded Consumer Advocate of the Year in 2009 by the National Association of Consumer Advocates. The Florida Bar named Ms. Varnell the 2019 Consumer Protection Lawyer of the Year.

14. Attorney Matthew Peterson has a Bachelor’s degree from the University of Iowa (2012). He obtained his Juris Doctorate degree from Northern Illinois University College of Law (2015). Mr. Peterson’s practice has focused on consumer class actions since 2015.

15. Attorney Erika R. Willis, has a Bachelor of Science Degree in Psychology and History from the University of Florida (2009) and her Juris Doctorate degree from the Levin College of Law at the University of Florida (2012). After law school, Mrs. Willis worked for a Miami based AM Law 100 firm focused on business litigation, class actions and securities until 2020. Mrs. Willis’s practice since 2020 has primarily focused on consumer class actions.

16. The hourly rates for the lawyers and paralegals working on this matter are as follows:

Name	Position	Years in Practice	Hourly Rate
Brian W. Warwick	Attorney	22	\$650
Janet R. Varnell	Attorney	27	\$650
Mathew Peterson	Attorney	8	\$450
Erika Willis	Attorney	9	\$450

Karen Stroly	Paralegal	40	\$220
Christian Koerner	Paralegal	23	\$220
Ashleigh Wallace	Paralegal	24	\$220

17. Detailed time records for this matter for the lawyers and staff within my firm are attached as Exhibit 1. I have reviewed the time and eliminated redundant or unnecessary time, where appropriate. I also removed the majority of short emails between team members regarding the case.

18. My firm's total lodestar for this matter through the date of this declaration is \$381,720.00 with a total of 861.2 hours expended.

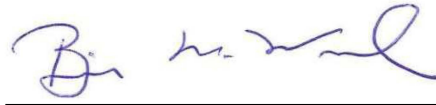
19. My firm has incurred the following reasonable and necessary expenses to the prosecution of this case:

Description	Amount
Mediator Invoice – Hunter Hughes	\$5,125.00
Travel Expenses – mediation	\$1,879.89
LF Expert removal of system	\$406.60
Pacer Fees	\$52.90
Legal Research Cost (Westlaw)	\$3,361.94
Total	\$10,826.33

I declare under penalty of perjury of the state of Florida that the foregoing is true and correct to the best of my knowledge, and that I could competently testify to these facts if called as a witness.

Executed in Tampa, Florida.

Dated: November 7, 2022.

A handwritten signature in blue ink, appearing to read "Brian W. Warwick", written over a horizontal line.

Brian W. Warwick

<u>DATE</u>	<u>TASK</u>	<u>DETAILS</u>	<u>HOURS</u>	<u>FIRST NAME</u>	<u>LAST NAME</u>	<u>ROLES</u>	<u>BILLABLE RATE</u>	<u>Billable Amount</u>
7/15/2020	Communications Email or Telephonic	Call with Ed referring attorney about the case	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
7/15/2020	Communications Email or Telephonic	Call w/ Zilinsky's re: potential case	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
7/17/2020	Investigation and Research	Investigate Leafilter claims/issues/BBB Complaints, etc.	2.0	Brian	Warwick	Attorney	\$650.00	\$1,300.00
7/21/2020	Investigation and Research	Investigate Leafilter; lawsuits/forums/company history, etc.	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
7/27/2020	Communications Email or Telephonic	Email from Brian Warwick regarding new potential	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
7/27/2020	Communications Email or Telephonic	Email to Matthew Peterson re new potential case	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
7/27/2020	Communications Email or Telephonic	email to clients regarding Matthew Peterson investigating	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
7/27/2020	Communications Email or Telephonic	Jim Zilinsky email matthew post call with 70 page investigation report	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
7/27/2020	Communications Email or Telephonic	Matthew Call with Zilinksy	0.8	Matthew	Peterson	Attorney	\$450.00	\$360.00
7/28/2020	Investigation and Research	Review Documents from Zilinsky's	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
7/28/2020	Investigation and Research	Review Documents from Zilinsky's	3.5	Matthew	Peterson	Attorney	\$450.00	\$1,575.00
7/29/2020	Legal Research	Research theories of recovery	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
8/5/2020	Communications Email or Telephonic	Email retainer to Jim and Gerry	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/5/2020	Communications Email or Telephonic	Email from Karen regarding retainer agreement edits	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/5/2020	Communications Email or Telephonic	email with Matthew Peterson regarding retainer agreement	0.1	Karen	Stroley	Paralegal	\$220.00	\$22.00
8/5/2020	Communications Email or Telephonic	Email from Matthew Peterson to Karen regarding changing names on retainer agreement	1.0	Matthew	Peterson	Attorney	\$450.00	\$450.00
8/5/2020	Drafting of Papers or Pleadings	Drafting Retainer Agreement	0.3	Karen	Stroley	Paralegal	\$220.00	\$66.00
8/5/2020	Retainer	Review and send Retainer agreement to Zilinsky's	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
8/6/2020	Communications Email or Telephonic	Email from Jim regarding questions of retainer agreement	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/7/2020	Communications Email or Telephonic	Email from Jim in response to retainer answers I submitted	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/7/2020	Communications Email or Telephonic	Email to Jim regarding faxing the retainer	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/7/2020	Communications Email or Telephonic	Response to Jim retainer agreement questions via emial	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
8/8/2020	Communications Email or Telephonic	Email from jim regarding Covid impact on court	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/8/2020	Communications Email or Telephonic	Emial to Jim regarding deposition likely be remote	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/10/2020	Communications Email or Telephonic	Email from Ashleigh Wallace regarding Retainer executed	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/10/2020	Communications Email or Telephonic	Email from Jim regarding more documetns	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/11/2020	Communications Email or Telephonic	Emial from Jim regarding more evidence he found	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/11/2020	Communications Email or Telephonic	Email from Jim regarding items he mailed	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/14/2020	Communications Email or Telephonic	Email from Jim regarding status of his package to me	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/14/2020	Communications Email or Telephonic	Email to Jim regarding my mail address	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/14/2020	Communications Email or Telephonic	Email from Jim confirming address	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/14/2020	Communications Email or Telephonic	Email to Jim regarding office address	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/14/2020	Communications Email or Telephonic	Email from Jim updating on package status	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/21/2020	Communications Email or Telephonic	Email from Ashleigh Wallace regarding signed retainers agreement	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/21/2020	Communications Email or Telephonic	Email to Matthew Peterson re signed retainers	0.1	Ashleigh	Wallace	Paralegal	\$200.00	\$20.00
8/24/2020	Communications Email or Telephonic	Email to Matthew from Jim regarding package	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/24/2020	Communications Email or Telephonic	Email to Jim re package	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/24/2020	Communications Email or Telephonic	Email from Jim regarding confirming when I receive package	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/1/2020	Communications Email or Telephonic	Call with Jim regarding package	0.3	Matthew	Peterson	Attorney	\$450.00	\$135.00
9/2/2020	Communications Email or Telephonic	email from Jim regarding package	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/8/2020	Legal Research	Westlaw research for similar cases and legal issues; send cases to Brian for review	1.2	Matthew	Peterson	Attorney	\$450.00	\$540.00
9/9/2020	Legal Research	Review cases sent by MTP for applicable law	1.5	Brian	Warwick	Attorney	\$650.00	\$975.00
9/14/2020	Communications Email or Telephonic	Email from Jim to Matthew re update	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/14/2020	Communications Email or Telephonic	Email to Brian regarding taking down gutter	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/14/2020	Communications Email or Telephonic	Email from Brian regarding taking down gutter	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/14/2020	Communications Email or Telephonic	Email from Brian to Matt regarding research of Pell	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/14/2020	Communications Email or Telephonic	Email from Matt regarding taking down gutter	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
9/14/2020	Communications Email or Telephonic	Email to Matt regarding taking down gutter	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
9/14/2020	Communications Email or Telephonic	Email to Matt from brian regarding Pella	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
9/26/2020	Communications Email or Telephonic	email to Ashleigh about helping draft	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/26/2020	Communications Email or Telephonic	Email from Matt regarding drafting complaint bones	0.1	Ashleigh	Wallace	Paralegal	\$200.00	\$20.00

9/29/2020	Communications Email or Telephonic	Email from Jim to Matthew re update on gutter	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/29/2020	Communications Email or Telephonic	Email to Jim from Matthew regarding call	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/29/2020	Communications Email or Telephonic	Call with Jim regarding taking down gutter	0.5	Matthew	Peterson	Attorney	\$450.00	\$225.00
10/1/2020	Drafting of Papers or Pleadings	Draft complaint outline for Matt	1.4	Ashleigh	Wallace	Paralegal	\$200.00	\$280.00
10/3/2020	Drafting of Papers or Pleadings	Draft complaint	8.0	Matthew	Peterson	Attorney	\$450.00	\$3,600.00
10/5/2020	Drafting of Papers or Pleadings	Draft complaint	8.0	Matthew	Peterson	Attorney	\$450.00	\$3,600.00
10/7/2020	Communications Email or Telephonic	email from Jim regarding date gutter taking down	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/7/2020	Communications Email or Telephonic	Email to Jim confirming date of gutter removal	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/7/2020	Communications Email or Telephonic	Email to team of draft complaint	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/7/2020	Drafting of Papers or Pleadings	Finish drafting complaint	5.0	Matthew	Peterson	Attorney	\$450.00	\$2,250.00
10/7/2020	Drafting of Papers or Pleadings	Review MTP draft of the Complaint and begin edits	5.0	Brian	Warwick	Attorney	\$650.00	\$3,250.00
10/9/2020	Communications Email or Telephonic	Email from Jim that gutter removed	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/15/2020	Communications Email or Telephonic	Email to Jim about the update of gutter	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/15/2020	Communications Email or Telephonic	Email from Jim about gutter removal	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/15/2020	Communications Email or Telephonic	Email of invoice for removal and notes of removal	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/15/2020	Communications Email or Telephonic	Email from Brian of thought of complain	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/15/2020	Communications Email or Telephonic	Email from Jim of corrected invoice for gutter removal	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/15/2020	Drafting of Papers or Pleadings	review Brian Edits and finish drafting	2.0	Matthew	Peterson	Attorney	\$450.00	\$900.00
10/15/2020	Drafting of Papers or Pleadings	Finalize redline of Matt Draft Complaint and email	4.4	Brian	Warwick	Attorney	\$650.00	\$2,860.00
10/16/2020	Communications Email or Telephonic	Email to Brian regarding Matt edits to Brians Edits to complaint	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/16/2020	Communications Email or Telephonic	email from Matt of his comments and edits to complaint	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
10/16/2020	Communications Email or Telephonic	Find local counsel in Ohio	1.5	Brian	Warwick	Attorney	\$650.00	\$975.00
10/23/2020	Communications Email or Telephonic	Email draft complaint to Jeff	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
10/23/2020	Communications Email or Telephonic	Call with Goldenberg Firm about being local	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
10/26/2020	Legal Research	Research 6th Circuit cases, break down where each Plaintiff resides/purchases/Def's Incorporated/nationwide viability, etc.	3.0	Matthew	Peterson	Attorney	\$450.00	\$1,350.00
10/27/2020	Communications Email or Telephonic	Email from Jim regarding website and warranty	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/27/2020	Communications Email or Telephonic	email to jim regarding website and warranty register	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/27/2020	Legal Research	Review MTP's research into 6th circuit cases, Plaintiffs location and corresponding details, can this be a nationwide case?, etc.; conduct my own research following up on MTP's memo	5.0	Brian	Warwick	Attorney	\$650.00	\$3,250.00
10/28/2020	Communications Email or Telephonic	email from jim to call him	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/28/2020	Communications Email or Telephonic	Email to Jim requesting to schdule call	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/28/2020	Communications Email or Telephonic	Email from jim giving a time to call	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/29/2020	Communications Email or Telephonic	email to Jim regarding call time change	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/29/2020	Communications Email or Telephonic	Email from jim regarding a question	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/29/2020	Communications Email or Telephonic	email from jim regarding videos he has	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/29/2020	Communications Email or Telephonic	Email from Jim of pictures	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/29/2020	Communications Email or Telephonic	Email to Jim confirming receipt of pictures	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/2/2020	Legal Research	Mag Moss research and caselaw	3.0	Matthew	Peterson	Attorney	\$450.00	\$1,350.00
11/3/2020	Legal Research	Review MTP Memo and caselaw on Mag Moss; conduct follow-up research on MTP leads	2.4	Brian	Warwick	Attorney	\$650.00	\$1,560.00
11/4/2020	Legal Research	Review latest cases and MM research	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
11/4/2020	Legal Research	Further warranty and MM research, send to BWW	2.0	Matthew	Peterson	Attorney	\$450.00	\$900.00
11/5/2020	Drafting of Papers or Pleadings	Edits to complaint given recent research	4.0	Brian	Warwick	Attorney	\$650.00	\$2,600.00
11/6/2020	Communications Email or Telephonic	Emial to Jim about registering gutter and if told by salesman	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/6/2020	Communications Email or Telephonic	email from jim on registration	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/6/2020	Communications Email or Telephonic	Email to Jim about registering warranty	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/6/2020	Communications Email or Telephonic	Email to team of the warranty after registering	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
11/6/2020	Communications Email or Telephonic	Call with GS re: filing/case	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
11/9/2020	Communications Email or Telephonic	Email to Todd regarding memo of events	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/9/2020	Communications Email or Telephonic	Email from Todd Naylor regarding Zilinsky communications with LF	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/10/2020	Communications Email or Telephonic	Email from Jeff regarding debris	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/10/2020	Communications Email or Telephonic	Email to Todd about sending videos	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/10/2020	Communications Email or Telephonic	Email from Todd to Matthew regarding Zilinsky experience	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00

11/10/2020	Communications Email or Telephonic	Text Todd photos and videos	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/10/2020	Communications Email or Telephonic	Email from Todd about debris at Zilinsky	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/13/2020	Communications Email or Telephonic	email to todd of IL Ag office letter	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/13/2020	Communications Email or Telephonic	Call with team	0.8	Matthew	Peterson	Attorney	\$450.00	\$360.00
11/13/2020	Review Discovery Documents	Review Leafilter's USA Warranty and emails re: same	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
11/18/2020	Communications Email or Telephonic	email from todd regarding complaint edits	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/18/2020	Drafting of Papers or Pleadings	Edits to Todd's edits to complaint	3.6	Matthew	Peterson	Attorney	\$450.00	\$1,620.00
11/19/2020	Communications Email or Telephonic	Email to Brian of my edits	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/19/2020	Communications Email or Telephonic	Email from Matt of his edits to complaint	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
11/19/2020	Drafting of Papers or Pleadings	Edits to complaint	1.5	Brian	Warwick	Attorney	\$650.00	\$975.00
11/23/2020	Communications Email or Telephonic	Email to Jim responding to his comments from complaint	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/23/2020	Communications Email or Telephonic	Email from Jim on status of case	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/23/2020	Communications Email or Telephonic	Email to Jim on status of cas	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/23/2020	Communications Email or Telephonic	Email to Jim that complaint finished and copy for him to review	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/23/2020	Communications Email or Telephonic	Email from Jim that received complaint	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/23/2020	Communications Email or Telephonic	Email from Jim of comments from review of complaint	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/23/2020	Communications Email or Telephonic	Email from jim on more infomration for complaint	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/23/2020	Drafting of Papers or Pleadings	Edits to complaint based on Jim's comments	2.0	Matthew	Peterson	Attorney	\$450.00	\$900.00
11/23/2020	Drafting of Papers or Pleadings	Draft edits to Brian's edits	2.4	Matthew	Peterson	Attorney	\$450.00	\$1,080.00
11/24/2020	Communications Email or Telephonic	Email to Jim of updated complaint	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/24/2020	Communications Email or Telephonic	Email from Jim that okay to file	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/24/2020	Communications Email or Telephonic	Email to team that jim okayed to file	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/24/2020	Communications Email or Telephonic	Jane call with GS about debris	0.5	Janet	Varnell	Attorney	\$650.00	\$325.00
12/1/2020	Communications Email or Telephonic	Email to Brian about debris	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/1/2020	Communications Email or Telephonic	Email to Jim of updated complaint	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/1/2020	Communications Email or Telephonic	Email from Brian about debris	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
12/1/2020	Communications Email or Telephonic	Emails re: latest draft of complaint	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
12/1/2020	Drafting of Papers or Pleadings	Review latest iteration of the complaint with fraud claims included	2.0	Brian	Warwick	Attorney	\$650.00	\$1,300.00
12/1/2020	Review of Papers or Pleadings	Review GS edits to complaint	0.3	Matthew	Peterson	Attorney	\$450.00	\$135.00
12/2/2020	Communications Email or Telephonic	Email to Todd about clients changes to GS version of complaint	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/3/2020	Communications Email or Telephonic	Email re: additional of venue language	0.1	Janet	Varnell	Attorney	\$650.00	\$65.00
12/3/2020	Communications Email or Telephonic	Email from Jeff regarding complaint	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
12/3/2020	Communications Email or Telephonic	Email from Jeff and co-counsel regarding complaint	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
12/3/2020	Legal Research	Research into venue and suggested additions to the complaint	2.0	Janet	Varnell	Attorney	\$650.00	\$1,300.00
12/15/2020	Communications Email or Telephonic	email from Janet to team about additional class rep	0.1	Janet	Varnell	Attorney	\$650.00	\$65.00
12/15/2020	Communications Email or Telephonic	email from jeff about new class rep	0.1	Janet	Varnell	Attorney	\$650.00	\$65.00
12/15/2020	Communications Email or Telephonic	email from janet to team about meeting with the potential class rep	0.1	Janet	Varnell	Attorney	\$650.00	\$65.00
12/21/2020	Communications Email or Telephonic	email from Todd that they were contacted by new potential class rep	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/21/2020	Communications Email or Telephonic	Email from todd about Corey Simpson call	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/21/2020	Communications Email or Telephonic	Email from Brian Warwick regarding new potential	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
12/22/2020	Communications Email or Telephonic	Email from Todd to Brian regarding amended complaint	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
12/22/2020	Communications Email or Telephonic	Emails regarding new plaintiffs	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
1/4/2021	Review Pleadings or Briefs	Review waiver of service	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/5/2021	Review Pleadings or Briefs	Pro hac	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/5/2021	Review Pleadings or Briefs	Pro hac	0.1	Janet	Varnell	Attorney	\$650.00	\$65.00
1/5/2021	Review Pleadings or Briefs	Pro hac	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
1/6/2021	Review Pleadings or Briefs	Cure letter from defense	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
1/7/2021	Communications Email or Telephonic	Email from Todd regarding cure leterr	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/11/2021	Communications Email or Telephonic	Emal to jim of cure letter	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/21/2021	Communications Email or Telephonic	Email from Todd regarding zilinsky reaction to cure	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/21/2021	Communications Email or Telephonic	Email to Todd about call	0.1	Janet	Varnell	Attorney	\$650.00	\$65.00
1/21/2021	Communications Email or Telephonic	Email from Todd about call time	0.1	Janet	Varnell	Attorney	\$650.00	\$65.00
1/21/2021	Communications Email or Telephonic	Email from Janet to Todd about call time	0.1	Janet	Varnell	Attorney	\$650.00	\$65.00
1/22/2021	Communications Email or Telephonic	Team Call amended complaint	0.5	Janet	Varnell	Attorney	\$650.00	\$325.00
1/26/2021	Communications Email or Telephonic	Email to Todd of cure letter	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00

1/26/2021	Communications Email or Telephonic	Emails re: Response to Cure	0.3	Brian	Warwick	Attorney	\$650.00	\$195.00
1/26/2021	Drafting of Papers or Pleadings	Draft response to cure letter	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
1/26/2021	Legal Research	Research cure statute in OH	1.5	Brian	Warwick	Attorney	\$650.00	\$975.00
2/1/2021	Communications Email or Telephonic	Email to Todd of edits to cure	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/1/2021	Communications Email or Telephonic	Emails re: Todd - Response to Cure	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
2/2/2021	Communications Email or Telephonic	Email cure letter response to Defense	0.1	Ashleigh	Wallace	Paralegal	\$200.00	\$20.00
2/4/2021	Communications Email or Telephonic	Email from Todd about filing cure	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/4/2021	Communications Email or Telephonic	Email from jeff t file cure	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/4/2021	Communications Email or Telephonic	Email from Jeff of MTD	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/4/2021	Communications Email or Telephonic	Email from Brian to file cure	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
2/4/2021	Review Pleadings or Briefs	Review of Motion to Dismiss	0.7	Matthew	Peterson	Attorney	\$450.00	\$315.00
2/9/2021	Communications Email or Telephonic	Email to team about MTD Call	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
2/9/2021	Communications Email or Telephonic	Email from GS regarding times	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
2/9/2021	Communications Email or Telephonic	Email from GS with more times	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
2/11/2021	Communications Email or Telephonic	Team Call amended complaint	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
2/12/2021	Drafting of Papers or Pleadings	Begin working on the amended complaint	3.3	Brian	Warwick	Attorney	\$650.00	\$2,145.00
2/16/2021	Communications Email or Telephonic	email to team about amended complaint	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/16/2021	Communications Email or Telephonic	Email from GS about times	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
2/16/2021	Review Discovery Documents	Shirley Stephenson docs for call tomorrow	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
2/17/2021	Communications Email or Telephonic	Call with Shirley Stephenson	0.8	Brian	Warwick	Attorney	\$650.00	\$520.00
2/18/2021	Communications Email or Telephonic	Conference call re: amending complaint	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
2/18/2021	Drafting of Papers or Pleadings	Review/edit Rep Agreement and Preservation Letter to Stephensons	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
2/23/2021	Communications Email or Telephonic	email from Todd to Brian about rule 15	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
2/23/2021	Review	Motion for extension to respond	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
2/24/2021	Communications Email or Telephonic	email from brian to do research on omission	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/24/2021	Communications Email or Telephonic	Email from Todd with amended complaint	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/24/2021	Communications Email or Telephonic	email to matt regardign research on omission	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
2/24/2021	Communications Email or Telephonic	Email from Todd to Brian about case law on consumer fraud by	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
2/24/2021	Communications Email or Telephonic	Call with Shirley Stephenson	0.5	Janet	Varnell	Attorney	\$650.00	\$325.00
2/24/2021	Drafting of Papers or Pleadings	Draft edits to complaint	2.0	Matthew	Peterson	Attorney	\$450.00	\$900.00
		Review Matts edits and his research on consumer fraud elements for each state and conduct additional research; continue editing the						
2/24/2021	Drafting of Papers or Pleadings	amended complaint	3.0	Brian	Warwick	Attorney	\$650.00	\$1,950.00
2/24/2021	Legal Research	Research omission in OH and elements of consumer fraud in each state	3.5	Matthew	Peterson	Attorney	\$450.00	\$1,575.00
2/25/2021	Communications Email or Telephonic	Email to todd on consumer fraud elements for amendment	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
		Continue drafting amended complaint; Maryland law research classes						
2/25/2021	Drafting of Papers or Pleadings	certified under state statute	6.0	Brian	Warwick	Attorney	\$650.00	\$3,900.00
2/26/2021	Communications Email or Telephonic	Emails with Todd re: Vogels	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
2/26/2021	Review Pleadings or Briefs	Review Court order granting extension	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/26/2021	Review Pleadings or Briefs	Review Judge Watson standing order	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
3/2/2021	Drafting of Papers or Pleadings	Review/edit and approve sending of turn down letter to Stephensons	0.4	Brian	Warwick	Attorney	\$650.00	\$260.00
3/23/2021	Communications Email or Telephonic	Call with Jeff re: case	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
3/24/2021	Communications Email or Telephonic	Emails with Jeff re: potential NJ plaintiff	0.3	Brian	Warwick	Attorney	\$650.00	\$195.00
3/30/2021	Drafting of Papers or Pleadings	More edits to Todd's edits to amended complaint	1.6	Brian	Warwick	Attorney	\$650.00	\$1,040.00
3/31/2021	Communications Email or Telephonic	Email from Jim regarding his comments to amended complaint	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
3/31/2021	Communications Email or Telephonic	Email from Rober Sherwood regarding allegations of damages	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
3/31/2021	Communications Email or Telephonic	email from todd regarding consequential damages	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
3/31/2021	Communications Email or Telephonic	Email to Team about amended sections of complaint on damages	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
3/31/2021	Communications Email or Telephonic	Email from Jeff about consequential damages	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
3/31/2021	Communications Email or Telephonic	Email from to Team about damages	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
4/5/2021	Communications Email or Telephonic	Email from Greg Phillips about 26f	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
4/5/2021	Communications Email or Telephonic	Set up call with all counsel	0.3	Christian	Koerner	Paralegal	\$220.00	\$66.00
4/6/2021	Communications Email or Telephonic	email rule 26f report to defense	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
4/6/2021	Communications Email or Telephonic	Email to Todd about bifurcation	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
4/6/2021	Communications Email or Telephonic	email of Todds edits to 26f	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00

4/6/2021	Communications Email or Telephonic	26f call with defendants	0.4	Matthew	Peterson	Attorney	\$450.00	\$180.00
4/6/2021	Drafting of Papers or Pleadings	Review MTP's proposed 26f report and emails re: same	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
4/6/2021	Drafting of Papers or Pleadings	Draft Rule 26 report	1.0	Matthew	Peterson	Attorney	\$450.00	\$450.00
4/6/2021	Drafting of Papers or Pleadings	Multiple revisions of 26f Extension send to MTP for review	1.5	Christian	Koerner	Paralegal	\$220.00	\$330.00
4/6/2021	Review Pleadings or Briefs	Review defendants edits to Report	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
4/6/2021	Review Pleadings or Briefs	Review Todds 26f edits	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
4/9/2021	Communications Email or Telephonic	Call with counsel	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
4/9/2021	Drafting of Papers or Pleadings	Review 26f extension	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
4/13/2021	Communications Email or Telephonic	Email from Trevor about extension	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
4/13/2021	Communications Email or Telephonic	email to trevor granting extension	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
4/13/2021	Communications Email or Telephonic	Brian email to Trevor about getting back on extension	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
4/13/2021	Communications Email or Telephonic	Email form trevor about court call in	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
4/13/2021	Communications Email or Telephonic	email from trevor to brian about extension	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
4/13/2021	Communications Email or Telephonic	Emails Jeff & Todd re: filed complaint	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
4/13/2021	Communications Email or Telephonic	Team Call re hearing preparation	0.3	Brian	Warwick	Attorney	\$650.00	\$195.00
4/13/2021	Drafting of Papers or Pleadings	Draft revised 26f and send to co-counsel	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
4/13/2021	Drafting of Papers or Pleadings	Edits to 26f extension and send to MTP	2.0	Brian	Warwick	Attorney	\$650.00	\$1,300.00
4/13/2021	Hearing	Hearing	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
4/14/2021	Communications Email or Telephonic	email from trevor about revisions to 26f	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
4/14/2021	Communications Email or Telephonic	email to trevor about 26f edits	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
4/14/2021	Review Pleadings or Briefs	Review Trevor edits to 26f	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
4/15/2021	Communications Email or Telephonic	Emails with Defense counsel re: 26f edits they made	0.3	Brian	Warwick	Attorney	\$650.00	\$195.00
4/27/2021	Review Discovery Documents	Review commission sheets and emails re: same	2.0	Brian	Warwick	Attorney	\$650.00	\$1,300.00
5/7/2021	Communications Email or Telephonic	email from todd about intial disclosure	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
5/7/2021	Communications Email or Telephonic	email to GS that 26a okay	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
5/7/2021	Drafting of Papers or Pleadings	Work on V&W section Opposition to Motion to Dismiss and choice of law provision	7.0	Erika	Willis	Attorney	\$450.00	\$3,150.00
5/7/2021	Review Pleadings	Review 26a disclosure	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
5/10/2021	Communications Email or Telephonic	email from todd to defense about page limit	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
5/10/2021	Drafting of Papers or Pleadings	More edits to assigned section of the Oppisition to MTD	5.6	Erika	Willis	Attorney	\$450.00	\$2,520.00
5/10/2021	Drafting of Papers or Pleadings	Work on opposition to MTD	6.0	Brian	Warwick	Attorney	\$650.00	\$3,900.00
5/11/2021	Communications Email or Telephonic	email from trevor about page limit	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
5/11/2021	Communications Email or Telephonic	email to team about asking for more time to respond	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
5/11/2021	Communications Email or Telephonic	Email from todd to brian about not oppose	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
5/11/2021	Communications Email or Telephonic	Email to Todd on status of our section of brief	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
5/11/2021	Drafting of Papers or Pleadings	Finalize assigned section to the opp to mtd and send to Brian for his edits/review	3.8	Erika	Willis	Attorney	\$450.00	\$1,710.00
5/11/2021	Drafting of Papers or Pleadings	Review and beging editing/incorporation Erika's section on the Opposition to MTD	5.0	Brian	Warwick	Attorney	\$650.00	\$3,250.00
5/12/2021	Drafting of Papers or Pleadings	Finalize and circulate our section of the Opp to MTD	3.2	Brian	Warwick	Attorney	\$650.00	\$2,080.00
5/18/2021	Communications Email or Telephonic	Email from potential class member	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
5/20/2021	Communications Email or Telephonic	Email from Robert regarding GS section MTD	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
5/21/2021	Drafting of Papers or Pleadings	Review Erika's latest iteration of Opp to Mtd section and send back	5.0	Brian	Warwick	Attorney	\$650.00	\$3,250.00
5/21/2021	Drafting of Papers or Pleadings	Continued work on Opp to Mtd	6.0	Erika	Willis	Attorney	\$450.00	\$2,700.00
5/24/2021	Communications Email or Telephonic	Email from Robert with Todds edits to opposition	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
5/24/2021	Drafting of Papers or Pleadings	Review redline of GS edits and Erika's edits to our own section and begin addressing	5.0	Brian	Warwick	Attorney	\$650.00	\$3,250.00
5/24/2021	Drafting of Papers or Pleadings	Review BWV edits and send final version of our section	5.8	Erika	Willis	Attorney	\$450.00	\$2,610.00
5/25/2021	Review Pleadings or Briefs	Review most up to date brief	0.3	Brian	Warwick	Attorney	\$650.00	\$195.00
5/26/2021	Drafting of Papers or Pleadings	Review Opposition to MTD	3.0	Brian	Warwick	Attorney	\$650.00	\$1,950.00
6/7/2021	Review Discovery Documents	Review Scheduling order and discovery procedures; emails re: same	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
6/10/2021	Review Pleadings or Briefs	Review discovery procedures	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
6/15/2021	Communications Email or Telephonic	Email from Jeff re: customer fraud	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
6/15/2021	Communications Email or Telephonic	Emails with GS re: training video and other discovery	0.3	Christian	Koerner	Paralegal	\$220.00	\$66.00
6/15/2021	Review Discovery Documents	Review weekly commission sheets, youtube video, etc.	1.0	Christian	Koerner	Paralegal	\$220.00	\$220.00

6/17/2021	Review Pleadings or Briefs	Review LF reply to MTD	2.5	Brian	Warwick	Attorney	\$650.00	\$1,625.00
6/22/2021	Communications Email or Telephonic	email from Jeff to Janet about new plaintiffs	0.1	Janet	Varnell			\$0.00
6/22/2021	Communications Email or Telephonic	Email to GS about new plaintiffs	0.1	Janet	Varnell	Attorney	\$650.00	\$65.00
6/22/2021	Communications Email or Telephonic	Email to Janet from Todd re: new plaintiffs	0.1	Janet	Varnell	Attorney	\$650.00	\$65.00
6/23/2021	Communications Email or Telephonic	Emails re: potential new plaintiffs; review contact list	0.3	Brian	Warwick	Attorney	\$650.00	\$195.00
6/24/2021	Communications Email or Telephonic	Email with CCK re: Mr. Brigham	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
6/24/2021	Communications Email or Telephonic	Call with potential class member Mr. Brigham; follow-up	0.5	Christian	Koerner	Paralegal	\$220.00	\$110.00
6/25/2021	Communications Email or Telephonic	Email from Jim zilinsky regarding case update	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
6/25/2021	Communications Email or Telephonic	Conference call with co-counsel	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
6/28/2021	Review Discovery Documents	Continued review of discovery and what we need for requests	2.0	Christian	Koerner	Paralegal	\$220.00	\$440.00
6/30/2021	Drafting of Papers or Pleadings	Notices of Deposition	0.3	Christian	Koerner	Paralegal	\$220.00	\$66.00
6/30/2021	Review Pleadings or Briefs	Review Defendants initial disclosure	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
7/6/2021	Communications Email or Telephonic	Telephone conferen call with co-counsel re: rule 26	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
7/8/2021	Drafting of Papers or Pleadings	Draft RFP's, IROG's, RFA's	4.0	Christian	Koerner	Paralegal	\$220.00	\$880.00
7/9/2021	Drafting of Papers or Pleadings	Finalize and send draft RFP, IROG's, RFA's to BWV/MTP	1.5	Christian	Koerner	Paralegal	\$220.00	\$330.00
7/9/2021	Drafting of Papers or Pleadings	Review CCK's draft IROG, RFA, RFP's and begin edits; send to MTP	3.0	Brian	Warwick	Attorney	\$650.00	\$1,950.00
7/9/2021	Drafting of Papers or Pleadings	Draft IROG, RFP, FRA	8.0	Matthew	Peterson	Attorney	\$450.00	\$3,600.00
7/12/2021	Communications Email or Telephonic	Email to team sending draft discovery	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
7/12/2021	Drafting of Papers or Pleadings	Finish drafting IROG, RFP, RFA	2.5	Matthew	Peterson	Attorney	\$450.00	\$1,125.00
7/19/2021	Communications Email or Telephonic	Emails re: clients want to remove their gutters, etc.	0.4	Brian	Warwick	Attorney	\$650.00	\$260.00
7/23/2021	Communications Email or Telephonic	Email from jim about replacing gutters	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
7/23/2021	Communications Email or Telephonic	Email to Jim about new gutters	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
7/23/2021	Drafting of Papers or Pleadings	Review Todd's changes to RFP's; Emails re: same	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
7/23/2021	Drafting of Papers or Pleadings	Review Discovery RFP/RFA/IROG edits and make suggestions; emails re: same	1.2	Christian	Koerner	Paralegal	\$220.00	\$264.00
7/23/2021	Review Pleadings or Briefs	Review Todd redline of RFP	0.5	Matthew	Peterson	Attorney	\$450.00	\$225.00
7/27/2021	Communications Email or Telephonic	Emails from Todd re: requests	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
7/27/2021	Drafting of Papers or Pleadings	Review Todd's changes to RFA & IROGS; Emails re: same	1.5	Brian	Warwick	Attorney	\$650.00	\$975.00
7/27/2021	Review Pleadings or Briefs	Review Todd redline RFA	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
7/27/2021	Review Pleadings or Briefs	Review Todd redline of IROG	0.5	Matthew	Peterson	Attorney	\$450.00	\$225.00
7/29/2021	Drafting of Papers or Pleadings	Begin edits to todd's edits to RFP, IROG,RFA	2.0	Brian	Warwick	Attorney	\$650.00	\$1,300.00
8/3/2021	Communications Email or Telephonic	email to Brian about removing gutter	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/3/2021	Communications Email or Telephonic	Email to Jim about answer about gutter	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/3/2021	Communications Email or Telephonic	email to team about discovery response drafts	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
8/3/2021	Drafting of Papers or Pleadings	Edits and finalize to Todd's editsto RFP, IROG,RFA	3.0	Brian	Warwick	Attorney	\$650.00	\$1,950.00
8/4/2021	Communications Email or Telephonic	Email From Brian regarding gutter	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/4/2021	Communications Email or Telephonic	Email to Jim regarding gutter and our response	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/4/2021	Communications Email or Telephonic	Email to Matt about Gutter	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
8/5/2021	Communications Email or Telephonic	Final review and serve our RFA/RFP/IROG requests	1.0	Christian	Koerner	Paralegal	\$220.00	\$220.00
8/10/2021	Communications Email or Telephonic	Emails with Co-counsel about service of discovery	0.2	Christian	Koerner	Paralegal	\$220.00	\$44.00
8/10/2021	Communications Email or Telephonic	Emails with Jeff re: discovery and service	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
8/31/2021	Communications Email or Telephonic	Emai from Mike meyer about discovery	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
8/31/2021	Communications Email or Telephonic	Email from Defense Counsel re: extension to respond to discovery requests	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
9/3/2021	Communications Email or Telephonic	Email from Mike Meyer discovery extension	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/3/2021	Communications Email or Telephonic	Email to Mike accepting extension	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
9/21/2021	Communications Email or Telephonic	Email of defendant's discovery response	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/21/2021	Communications Email or Telephonic	Email to Brian if he got RFP response	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/21/2021	Communications Email or Telephonic	Send discovery responses to Jim	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/21/2021	Communications Email or Telephonic	Jim email to Matt regarding LF discovery response	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/21/2021	Communications Email or Telephonic	Email to Jim regarding LF discovery response	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/21/2021	Communications Email or Telephonic	Email from Jeff re expert	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
9/21/2021	Communications Email or Telephonic	Email to GS about expert	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
9/21/2021	Communications Email or Telephonic	email to Matt that no RFP came	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
9/21/2021	Communications Email or Telephonic	Email to GS about expert	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00

9/21/2021	Communications Email or Telephonic	Emails re: where are the RFP responses?	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
9/21/2021	Legal Research	Research experts on roof pitch and runoff	2.0	Brian	Warwick	Attorney	\$650.00	\$1,300.00
		Quick review of defendants discovery responses; send to CCK for						
9/21/2021	Review Discovery Documents	memo on what was produced	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
9/21/2021	Review Discovery Documents	Begin review of discovery responses of Leafilter; emails re: same	1.5	Christian	Koerner	Paralegal	\$220.00	\$330.00
9/21/2021	Review Pleadings or Briefs	Review Defendants discovery responses RFA and IROG	0.4	Matthew	Peterson	Attorney	\$450.00	\$180.00
		Draft memo and charts of the financial data provided by Leafilter in						
9/22/2021	Review Discovery Documents	their discovery responses; emails with all counsel re: same	3.0	Christian	Koerner	Paralegal	\$220.00	\$660.00
9/27/2021	Communications Email or Telephonic	Email to Chris regarding RFP response	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/27/2021	Communications Email or Telephonic	Email to LF counsel about no RFP response	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/27/2021	Communications Email or Telephonic	Email from Mike Meyer RFP	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
		Emails with Jeff and Todd re: discovery requests and responses, lack of						
9/27/2021	Communications Email or Telephonic	RFP responses	0.3	Christian	Koerner	Paralegal	\$220.00	\$66.00
9/27/2021	Drafting of Papers or Pleadings	Draft discovery deficiency letter RFA and IROG	2.5	Matthew	Peterson	Attorney	\$450.00	\$1,125.00
9/28/2021	Communications Email or Telephonic	Emails re: no RFP responses from Defendants	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
9/29/2021	Communications Email or Telephonic	Email from GS about times	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
9/29/2021	Communications Email or Telephonic	Email to GS about expert call	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
9/30/2021	Communications Email or Telephonic	Email from LF with RFP response	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
9/30/2021	Communications Email or Telephonic	Email from GS about new time for call	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
9/30/2021	Communications Email or Telephonic	Email re: Leafilters responses to RFP and draft Stip Protective Order	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
9/30/2021	Drafting of Papers or Pleadings	Draft protective order	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
9/30/2021	Review Discovery Documents	Review RFP responses and draft Stip Protective Order	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
9/30/2021	Review Discovery Documents	Review RFP Responses/draft Prot Order; emails re: summarizing	0.7	Christian	Koerner	Paralegal	\$220.00	\$154.00
9/30/2021	Review Pleadings or Briefs	Review LF RFP response	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/4/2021	Communications Email or Telephonic	Email to Todd about deficiency letter	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/4/2021	Communications Email or Telephonic	Emails re: Protective Order	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
10/4/2021	Drafting of Papers or Pleadings	Review Todds Protective Order	0.3	Brian	Warwick	Attorney	\$650.00	\$195.00
10/5/2021	Communications Email or Telephonic	Email to Team about if call set with expert	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
10/6/2021	Communications Email or Telephonic	Call with roof expert	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
10/7/2021	Review Pleadings or Briefs	Review Edits to Protective order	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
10/11/2021	Communications Email or Telephonic	Emails re: Protective Order	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
10/12/2021	Communications Email or Telephonic	Meet and confer regarding Protective order	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
10/13/2021	Communications Email or Telephonic	Emails among all counsel re: Protective Order	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
10/14/2021	Communications Email or Telephonic	Send discovery deficiency letter to GS	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/14/2021	Review Discovery Documents	Finalize and serve Deficiency letter	0.4	Christian	Koerner	Paralegal	\$220.00	\$88.00
10/14/2021	Review Discovery Documents	Review/edit MTP's Discovery deficiency letter; emails re: same	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
10/19/2021	Communications Email or Telephonic	Email to LF to set discovery response meet and confer	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/19/2021	Communications Email or Telephonic	Email from Mike Meyer re meet and confer	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
		Emails with Jeff & Todd re: list of items to discuss on call with Defense						
10/19/2021	Communications Email or Telephonic	counsel	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
10/21/2021	Meet and Confer	Meet and confer discovery	1.0	Matthew	Peterson	Attorney	\$450.00	\$450.00
10/21/2021	Meet and Confer	Meet and confer with Defense counsel	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
10/22/2021	Communications Email or Telephonic	Email following up on meet and confer	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/22/2021	Communications Email or Telephonic	Emails with all counsel re: meet and confer summarization	0.4	Brian	Warwick	Attorney	\$650.00	\$260.00
10/27/2021	Review Discovery Documents	Draft search terms for discovery; email to MTP	1.0	Christian	Koerner	Paralegal	\$220.00	\$220.00
10/28/2021	Communications Email or Telephonic	Email re: service of deposition notices	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
10/28/2021	Communications Email or Telephonic	Emails with Jeff & Todd re: search terms; review document	0.3	Brian	Warwick	Attorney	\$650.00	\$195.00
10/28/2021	Drafting of Papers or Pleadings	Draft depo notice to Tracy Blake	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/28/2021	Drafting of Papers or Pleadings	Draft depo notice to Paul Lochner	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
		Deposition notice to Lochner and Tracy Blake; emails re: same; email						
10/28/2021	Drafting of Papers or Pleadings	service to Defendants	0.8	Christian	Koerner	Paralegal	\$220.00	\$176.00
10/28/2021	Review Pleadings	Review deposition notices	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
10/29/2021	Communications Email or Telephonic	Emails with Jeff & Todd re: Search terms and Custodians	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
10/29/2021	Review Discovery Documents	Document Review Set #1 produced by LF	0.5	Matthew	Peterson	Attorney	\$450.00	\$225.00
10/29/2021	Review Discovery Documents	Review updated search terms and custodian list; edits	1.5	Brian	Warwick	Attorney	\$650.00	\$975.00

10/29/2021	Review Discovery Documents	Download and begin review of Production #1	2.0	Christian	Koerner	Paralegal	\$220.00	\$440.00
11/1/2021	Communications Email or Telephonic	Emails re: more changes to Search terms and custodian list	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
11/1/2021	Communications Email or Telephonic	Emails re: Todd edits to search terms and custodian list	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
11/2/2021	Communications Email or Telephonic	Email to LF regarding search terms	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/2/2021	Communications Email or Telephonic	Email to LF regarding IROG responses	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/2/2021	Communications Email or Telephonic	Email re: service of search terms/custodian list	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
11/2/2021	Drafting of Papers or Pleadings	Draft list of search terms	0.5	Matthew	Peterson	Attorney	\$450.00	\$225.00
11/2/2021	Review Discovery Documents	Document Review Set 1 produced by LF	5.0	Matthew	Peterson	Attorney	\$450.00	\$2,250.00
11/4/2021	Communications Email or Telephonic	Email from LF regarding search terms	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/4/2021	Communications Email or Telephonic	Email to LF regardin search terms	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/4/2021	Communications Email or Telephonic	Email response to our search terms/custodian list and further evaluation of Def's request	0.3	Brian	Warwick	Attorney	\$650.00	\$195.00
11/5/2021	Communications Email or Telephonic	email to LF regardign depositions	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/5/2021	Review Discovery Documents	Review and log. Production #1 and start on deficiencies to our RFP's; emails re: same	6.5	Christian	Koerner	Paralegal	\$220.00	\$1,430.00
11/8/2021	Communications Email or Telephonic	email to LF regarding outstanding issues	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/8/2021	Communications Email or Telephonic	Email to LF regarding issues	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/8/2021	Communications Email or Telephonic	Emails from Defendants re: search terms	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
11/8/2021	Review Discovery Documents	Finalize review/log of Production #1 and send to MTP/BWW	3.0	Christian	Koerner	Paralegal	\$220.00	\$660.00
11/9/2021	Communications Email or Telephonic	Email to LF regarding meet and confer on Discovery	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/9/2021	Drafting of Papers or Pleadings	Review CCK's list of RFP deficiencies and spreadsheet on Prod. #1	2.0	Brian	Warwick	Attorney	\$650.00	\$1,300.00
11/9/2021	Review Discovery Documents	Draft RFP deficiencies and summary of docs	2.2	Christian	Koerner	Paralegal	\$220.00	\$484.00
11/11/2021	Communications Email or Telephonic	email from LF regarding outstanding questions on discovery	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/11/2021	Communications Email or Telephonic	Email from Todd regarding LF response	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/11/2021	Communications Email or Telephonic	Emails with all counsel re: answers to our Rogs still in question, information on the digital production, etc.	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
11/15/2021	Communications Email or Telephonic	Email from LF requesting a response from us	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/15/2021	Communications Email or Telephonic	email to GS regarding call time	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/15/2021	Communications Email or Telephonic	Email to LF regarding terms for IROG 3	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/16/2021	Communications Email or Telephonic	email from Todd about a call time	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/16/2021	Communications Email or Telephonic	email to LF about a call Thursday	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/16/2021	Communications Email or Telephonic	Email from LF that available	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/16/2021	Communications Email or Telephonic	email to todd about expert	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
11/16/2021	Legal Research	Expert research on damage to structures from water	0.3	Brian	Warwick	Attorney	\$650.00	\$195.00
11/18/2021	Communications Email or Telephonic	Todd email to Brian regarding expert	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
11/18/2021	Communications Email or Telephonic	Call with todd	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
11/18/2021	Review Discovery Documents	Review LF supplemental IRGO response	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
11/19/2021	Review Discovery Documents	Review supplemental IROG responses and emails re: same	0.3	Brian	Warwick	Attorney	\$650.00	\$195.00
11/19/2021	Review Discovery Documents	Review Supplimentary ROG responses; emails re: same	0.7	Christian	Koerner	Paralegal	\$220.00	\$154.00
11/22/2021	Communications Email or Telephonic	Email to LF about Blake deposition	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/22/2021	Communications Email or Telephonic	Email to Todd of edits to EOT	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
11/22/2021	Communications Email or Telephonic	Emails with all counsel re: sending of extension to Defense counsel and their response	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
11/22/2021	Drafting of Papers or Pleadings	Review and finalize Scheduling Order and send to BWW and then to defense counsel for approval	1.0	Christian	Koerner	Paralegal	\$220.00	\$220.00
11/22/2021	Review Pleadings	Review Todds joint extension of deadline and edits	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
11/23/2021	Communications Email or Telephonic	Many emails regarding scheduling of depositions	1.0	Christian	Koerner	Paralegal	\$220.00	\$220.00
11/23/2021	Review Pleadings	Review defense counsel's proposed edits to Protective Order	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
11/24/2021	Communications Email or Telephonic	Email from LF regarding search terms	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/24/2021	Communications Email or Telephonic	Emails with Greg re: filing Protective Order	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
11/24/2021	Communications Email or Telephonic	Emails from Defendants re: results of search terms and 11 custodians of the raw data	0.4	Brian	Warwick	Attorney	\$650.00	\$260.00
11/29/2021	Communications Email or Telephonic	Email from Todd re discovery	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/29/2021	Communications Email or Telephonic	Email from GS regardign 30b6	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
11/29/2021	Communications Email or Telephonic	Email to GS regardig 30b6	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00

11/30/2021	Communications Email or Telephonic	email to LF in response to document data	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
11/30/2021	Communications Email or Telephonic	Call with Brian re document data	0.3	Matthew	Peterson	Attorney	\$450.00	\$135.00
11/30/2021	Communications Email or Telephonic	Call with Matt re document data	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
12/1/2021	Communications Email or Telephonic	email from Trevor re document production	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/3/2021	Communications Email or Telephonic	Emails re: 30b6	0.2	Christian	Koerner	Paralegal	\$220.00	\$44.00
12/3/2021	Communications Email or Telephonic	Emails with Todd and co-counsel re: my edits to 30b6, etc.	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
12/3/2021	Drafting of Papers or Pleadings	Review Todd's edits to 30b6 and make my own	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
12/14/2021	Communications Email or Telephonic	email from Treveor re first 5,000 emails	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/17/2021	Communications Email or Telephonic	Email to Jim update on case	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/17/2021	Communications Email or Telephonic	Email from Jim update on case	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/17/2021	Communications Email or Telephonic	Emails re: potential new clients for case	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
12/17/2021	Communications Email or Telephonic	Emails re: Production #2 and dates for Lochner/Blake depositions	0.3	Brian	Warwick	Attorney	\$650.00	\$195.00
12/17/2021	Review Discovery Documents	Begin Review of Production #2	4.0	Christian	Koerner	Paralegal	\$220.00	\$880.00
12/18/2021	Review Discovery Documents	Document review Set 2	8.0	Matthew	Peterson	Attorney	\$450.00	\$3,600.00
12/19/2021	Review Discovery Documents	Document set 2	8.0	Matthew	Peterson	Attorney	\$450.00	\$3,600.00
12/20/2021	Review Discovery Documents	Review summary of Production #1; emails re: same	0.7	Brian	Warwick	Attorney	\$650.00	\$455.00
12/20/2021	Review Discovery Documents	Document set 2	8.0	Matthew	Peterson	Attorney	\$450.00	\$3,600.00
12/20/2021	Review Discovery Documents	Review Production #2 and spreadsheet	9.0	Christian	Koerner	Paralegal	\$220.00	\$1,980.00
12/21/2021	Communications Email or Telephonic	Meet and confer LF	0.4	Brian	Warwick	Attorney	\$650.00	\$260.00
12/21/2021	Drafting of Papers or Pleadings	Another Deficiency document	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
12/21/2021	Review Discovery Documents	Revisit RFP deficiencies/installation manual/memo, etc. for meet and confer; emails re: same	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
12/21/2021	Review Discovery Documents	Review Production #2 and spreadsheet	8.0	Christian	Koerner	Paralegal	\$220.00	\$1,760.00
12/22/2021	Communications Email or Telephonic	Email to LF about follow up to call	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
12/27/2021	Communications Email or Telephonic	Served Discovery by LF	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/27/2021	Communications Email or Telephonic	Emails re: Defs RFP and IROG's to plaintiffs	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
12/27/2021	Review Discovery Documents	Review discovery served	0.3	Matthew	Peterson	Attorney	\$450.00	\$135.00
12/27/2021	Review Discovery Documents	Review defendants RFP and IROG requests	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
12/27/2021	Review Discovery Documents	Review Discovery purported on our clients; emails/calls re: same	3.0	Christian	Koerner	Paralegal	\$220.00	\$660.00
12/28/2021	Communications Email or Telephonic	email to todd regarding lochner dep	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/28/2021	Communications Email or Telephonic	Email from Jeff regarding experts	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/28/2021	Communications Email or Telephonic	Email from Bruce (lochner) re dep	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/28/2021	Communications Email or Telephonic	Email from Todd regarding Lochner dep	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/28/2021	Communications Email or Telephonic	Email from todd regarding lochner	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/28/2021	Communications Email or Telephonic	Email to Lochner lawyer about depo	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/30/2021	Communications Email or Telephonic	Email from Mike Silverstein re Vol 3 doc production	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
12/30/2021	Communications Email or Telephonic	Emails with Jeff & Todd re: damages expert	0.3	Brian	Warwick	Attorney	\$650.00	\$195.00
12/30/2021	Review Discovery Documents	Begin review of Production #3	2.5	Christian	Koerner	Paralegal	\$220.00	\$550.00
12/31/2021	Review Discovery Documents	Review of Production #3	4.0	Christian	Koerner	Paralegal	\$220.00	\$880.00
1/3/2022	Drafting of Papers or Pleadings	Draft letter to zilinkis for discovery they need to produce	0.5	Matthew	Peterson	Attorney	\$450.00	\$225.00
1/3/2022	Review Discovery Documents	Review of Production #3, spreadsheet and email hot docs	7.0	Christian	Koerner	Paralegal	\$220.00	\$1,540.00
1/3/2022	Review of Papers or Pleadings	review hot document	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
1/4/2022	Communications Email or Telephonic	Email from Greg Phillips	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/4/2022	Communications Email or Telephonic	Email from Todd Nayer regarding depositions	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/4/2022	Legal Research	meet with JRV and Todd about changes to Complaint. And, legal research on Conjoint Analysis. And damages models.	2.6	Brian	Warwick	Attorney	\$650.00	\$1,690.00
1/4/2022	Review of Papers or Pleadings	Review Defendants objections to 30b6 deposition	0.5	Matthew	Peterson	Attorney	\$450.00	\$225.00
1/4/2022	Review of Papers or Pleadings	Review of Third Production	6.0	Christian	Koerner	Paralegal	\$220.00	\$1,320.00
1/5/2022	Communications Email or Telephonic	Email from Brian Warwick regarding objections received for 30b6	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/5/2022	Communications Email or Telephonic	Email from Janet Varnell regarding class certification issues and what to focus claims on. Read her attached research for the class cert motion	0.5	Matthew	Peterson	Attorney	\$450.00	\$225.00
1/5/2022	Communications Email or Telephonic	Conference Call with Todd Naylor re: trajectory of case, claims, amendment of complaint, plaintiff discovery, expert witness selection and disclosure	1.0	Janet	Varnell	Attorney	\$650.00	\$650.00
1/5/2022	Communications Email or Telephonic	Spoke to Janet and Todd about strategy	1.3	Brian	Warwick	Attorney	\$650.00	\$845.00

1/5/2022	Legal Research	Locate Expert Witnesses; confer and research on expert witnesses and class action certification issues	1.5	Janet	Varnell	Attorney	\$650.00	\$975.00
1/5/2022	Review Discovery Documents	Review Docs and itemize on spreadsheet	5.0	Christian	Koerner	Paralegal	\$220.00	\$1,100.00
1/5/2022	Review of Papers or Pleadings	Review hot documents	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/6/2022	Communications Email or Telephonic	Email from Brian Warwick regarding letter to clients regarding discovery responses	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/6/2022	Review Discovery Documents	Document Review and Catalogue	8.0	Christian	Koerner	Paralegal	\$220.00	\$1,760.00
1/6/2022	Review of Papers or Pleadings	Review Todd Nayer redline to letter to clients	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
1/6/2022	Review of Papers or Pleadings	receive and review DFs objections to Notice of Deposition; review Rule 30(b)(6) and Southern District of Ohio local rules to determine response requirements and/or deadlines for same	0.5	Karen	Stroly	Paralegal	\$220.00	\$110.00
1/7/2022	Communications Email or Telephonic	Call with team regarding experts and class definition	0.5	Matthew	Peterson	Attorney	\$450.00	\$225.00
1/7/2022	Communications Email or Telephonic	Call with Janet, todd and Jeff about experts and claims	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
1/7/2022	Communications Email or Telephonic	Conference call with all cocounsel discussing case strategy and legal research; call with Matt Peterson discussing discovery	1.5	Janet	Varnell	Attorney	\$650.00	\$975.00
1/7/2022	Drafting of Papers or Pleadings	finalize discovery letter and sent to zilinksys	0.5	Matthew	Peterson	Attorney	\$450.00	\$225.00
1/7/2022	Review Discovery Documents	Quick overlook of Prod #5	2.0	Christian	Koerner	Paralegal	\$220.00	\$440.00
1/7/2022	Review Discovery Documents	Review and log. Prod #4	8.0	Christian	Koerner	Paralegal	\$220.00	\$1,760.00
1/10/2022	Communications Email or Telephonic	Email from Brian Warwick re: RFPs and IROGs	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/10/2022	Communications Email or Telephonic	Email from Jim Zilinsky regarding discovery requests	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/10/2022	Communications Email or Telephonic	Email from Paul Lochner counsel for deposition dates	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/10/2022	Communications Email or Telephonic	Email to Leaf Filter and Todd Nayer regarding Paul Lochner deposition	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/10/2022	Communications Email or Telephonic	review BW correspondence to client re: discovery	0.2	Karen	Stroly	Paralegal	\$220.00	\$44.00
1/10/2022	Communications Email or Telephonic	Call with Jim and Gerrie Zilinsky	0.3	Matthew	Peterson	Attorney	\$450.00	\$135.00
1/10/2022	Review Discovery Documents	Review and Catalogue the large amount of documents	8.0	Christian	Koerner	Paralegal	\$220.00	\$1,760.00
1/11/2022	Communications Email or Telephonic	Email for Paul Lochner depositions to his counsel and Todd Nayer	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/11/2022	Communications Email or Telephonic	emails to approve expert expenses	0.1	Janet	Varnell	Attorney	\$650.00	\$65.00
1/11/2022	Communications Email or Telephonic	Respond to Jeff Goldenberg email regarding expert damages. Provided dated relating to LF sales	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
1/11/2022	Communications Email or Telephonic	Review email re experts from Goldenberg; Research revenue estimates; draft responsive email	0.5	Janet	Varnell	Attorney	\$650.00	\$325.00
1/11/2022	Drafting of Papers or Pleadings	Subpoena Duces Tecum for Lockner, emails re: same	1.0	Christian	Koerner	Paralegal	\$220.00	\$220.00
1/11/2022	Drafting of Papers or Pleadings	Draft responses to Request for Production and conduct research for objections for Gerri Zilinsky	2.0	Matthew	Peterson	Attorney	\$450.00	\$900.00
1/11/2022	Drafting of Papers or Pleadings	Draft Responses to Interrogatories for Gerri Zilinsky and research case law to support objections	3.5	Matthew	Peterson	Attorney	\$450.00	\$1,575.00
1/11/2022	Review Discovery Documents	Continued review and indexing of discovery	5.0	Christian	Koerner	Paralegal	\$220.00	\$1,100.00
1/11/2022	Review of Papers or Pleadings	receive and review e-mail regarding objections to 30(b)(6) deposition	0.2	Karen	Stroly	Paralegal	\$220.00	\$44.00
1/12/2022	Communications Email or Telephonic	Emails from Todd and Greg Philips regarding 30b6 and witnesses,	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/13/2022	Communications Email or Telephonic	Email from Brian Warwick about Tracy Blake deposition	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/13/2022	Communications Email or Telephonic	Email with Christian Kornier about Lochner deposition and subpoena	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/13/2022	Communications Email or Telephonic	receive and review e-mail regarding objections and witness list; topics in depo notice; available dates; document production	0.2	Karen	Stroly	Paralegal	\$220.00	\$44.00
1/13/2022	Communications Email or Telephonic	Work on depo notice, specifically the requests for production to Paul Lochner	0.3	Matthew	Peterson	Attorney	\$450.00	\$135.00
1/14/2022	Communications Email or Telephonic	Email from Michael Siverstein regarding document production	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/14/2022	Communications Email or Telephonic	Travel to Jim and Gerrie house to meet	1.0	Matthew	Peterson	Attorney	\$450.00	\$450.00
1/14/2022	Communications Email or Telephonic	travel back from jim and gerrie house	1.0	Matthew	Peterson	Attorney	\$450.00	\$450.00
1/14/2022	Communications Email or Telephonic	Meet with Jim and Gerrie to go over RFPs and IRGOs, and take photos of house	3.0	Matthew	Peterson	Attorney	\$450.00	\$1,350.00
1/14/2022	Drafting of Papers or Pleadings	Review Todd Nayers comments to draft IROG and RFPs	0.5	Matthew	Peterson	Attorney	\$450.00	\$225.00
1/14/2022	Drafting of Papers or Pleadings	Start drafting IROG responses for Gerrie	1.0	Matthew	Peterson	Attorney	\$450.00	\$450.00
1/14/2022	Review Discovery Documents	Document review	8.0	Christian	Koerner	Paralegal	\$220.00	\$1,760.00
1/18/2022	Communications Email or Telephonic	Email from Chris Koerner regardign document production	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/18/2022	Communications Email or Telephonic	Email to Brian Warwick regarding Tracy Blake deposition	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00

1/18/2022	Communications Email or Telephonic	Email from Brian Warwick regarding Tracy Blake deposition	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/18/2022	Communications Email or Telephonic	Email to Todd Naylor regarding Tracy Blake deposition	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/18/2022	Communications Email or Telephonic	Email from Todd Naylor regarding Tracy Blake	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/18/2022	Communications Email or Telephonic	Email from Todd Naylor regarding deposition dates	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/18/2022	Communications Email or Telephonic	Email regarding mediation	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/18/2022	Communications Email or Telephonic	call to Defense counsel	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
1/18/2022	Communications Email or Telephonic	Call with Brian Warwick about LF's newest document production, representations, and experts	0.5	Matthew	Peterson	Attorney	\$450.00	\$225.00
1/18/2022	Communications Email or Telephonic	Meeting on experts with Todd and Jeff	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
1/18/2022	Drafting of Papers or Pleadings	Prepare outline for expert report	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
1/18/2022	Review Discovery Documents	Document review and indexing	8.0	Christian	Koerner	Paralegal	\$220.00	\$1,760.00
1/19/2022	Communications Email or Telephonic	receive and review e-mail exchanges regarding document production and deposition dates; check calendar	0.2	Karen	Stroly	Paralegal	\$220.00	\$44.00
1/19/2022	Review Discovery Documents	Document review and further indexing	8.3	Christian	Koerner	Paralegal	\$220.00	\$1,826.00
1/20/2022	Legal Research	locate deposition notices and save to WD; add all (6) 30(b)(6) witnesses (names and topics they will cover) to all dates on calendar; locate deposition subpoena for Paul Lochner; add to calendar; save to WD	0.5	Karen	Stroly	Paralegal	\$220.00	\$110.00
1/20/2022	Meet and Confer	Research on proposed mediators and report to Brian	1.0	Janet	Varnell	Attorney	\$650.00	\$650.00
1/20/2022	Review Discovery Documents	Review LeafFilter_019944 to LeafFilter_021036	8.0	Christian	Koerner	Paralegal	\$220.00	\$1,760.00
1/21/2022	Communications Email or Telephonic	Email from Brian Warwick about LF advertisements	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/21/2022	Communications Email or Telephonic	Email to Todd Naylor about representations LF made in Brochure and collected photos to send	0.4	Matthew	Peterson	Attorney	\$450.00	\$180.00
1/21/2022	Communications Email or Telephonic	discussion with Defense counsel and Todd Naylor on mediators. e-mail exchange with BW regarding mediator Hunter Hughes in Atlanta; e-mail exchange with BW regarding Motion for stay pending mediation; research and review FRCP and Southern District of Ohio local rules; draft motion	1.1	Brian	Warwick	Attorney	\$650.00	\$715.00
1/21/2022	Drafting of Papers or Pleadings	Reserach on mediators. Call to other plaintiff lawyers who have used Demrow and Hughes.	1.0	Karen	Stroly	Paralegal	\$220.00	\$220.00
1/21/2022	Legal Research	Look at hot docs from Chris for documents showing no maintenance.	2.5	Brian	Warwick	Attorney	\$650.00	\$1,625.00
1/21/2022	Review Discovery Documents	Review and Catalogue Documents starting with LeafFilter_021037 and ending on LeafFilter_022222	1.2	Brian	Warwick	Attorney	\$650.00	\$780.00
1/21/2022	Review Discovery Documents	Review email from Todd Naylor re maintenance free	8.0	Christian	Koerner	Paralegal	\$220.00	\$1,760.00
1/23/2022	Communications Email or Telephonic	Email to Todd Naylor re maintenance free	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/23/2022	Communications Email or Telephonic	Email to Todd Naylor regarding timing of document production	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/23/2022	Communications Email or Telephonic	Texts to and from James Zilinsky about sending electronic copies of all photos, emails, and documents	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
1/23/2022	Drafting of Papers or Pleadings	Draft IROG responses for Gerrie Zilinsky	2.0	Matthew	Peterson	Attorney	\$450.00	\$900.00
1/23/2022	Review Discovery Documents	Reviewing p.1-80 of Zilinsky work product memo to Matthew Peterson to assist in RFP and IROG responses	3.0	Matthew	Peterson	Attorney	\$450.00	\$1,350.00
1/24/2022	Communications Email or Telephonic	Email from Brian Warwick regarding Maintenance free from brochure Zilinkys got	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/24/2022	Communications Email or Telephonic	Email from Todd Nayer regarding whether we have seen certain clients documents in production	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/24/2022	Communications Email or Telephonic	Email to Todd Naylor regarding setting up a call	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/24/2022	Communications Email or Telephonic	Emails to and from Jim Zilinsky regarding IROG and RFP documents	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/24/2022	Communications Email or Telephonic	Call with Greg Phillips on motion to stay. Communicated contents of call to my team.	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
1/24/2022	Drafting of Papers or Pleadings	Revise Motion to stay	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
1/24/2022	Drafting of Papers or Pleadings	Draft James Zilinsky IROG responses	1.0	Matthew	Peterson	Attorney	\$450.00	\$450.00
1/24/2022	Drafting of Papers or Pleadings	Finish Gerrie Zilinsky IROG responses	2.0	Matthew	Peterson	Attorney	\$450.00	\$900.00
1/24/2022	Review Discovery Documents	Review the client contracts Christian Koerner sent to see if each are the same or different	0.7	Matthew	Peterson	Attorney	\$450.00	\$315.00
1/24/2022	Review Discovery Documents	Search through Productions for Client Agreements at request of all counsel.	3.0	Christian	Koerner	Paralegal	\$220.00	\$660.00

1/24/2022	Review Discovery Documents	LeafFilter_022223 to LeafFilter_022553 Jim Zilinsky sent 6 folders of documents, emails, and photos. I reviewed Folders 1 through 6 for responsiveness to LeafFilter's Request for Production. It was 300 documents	3.0	Christian	Koerner	Paralegal	\$220.00	\$660.00
1/24/2022	Review Discovery Documents	review file; download Defendant's discovery requests to all PLs; check deadline to respond; update calendar; e-mail exchange with MTP; save all requests to WD; additional e-mail exchanges with MTP regarding advising team of new deadline; review complaint to determine co-counsel; e-mail MTP regarding co-counsel; check mediation dates; e-mail exchange with BW regarding PLs attendance at mediation and timesheet; update notes	4.5	Matthew	Peterson	Attorney	\$450.00	\$2,025.00
1/24/2022	Review of Papers or Pleadings	Emails to Chris Koerner for document production	1.0	Karen	Stroly	Paralegal	\$220.00	\$220.00
1/25/2022	Communications Email or Telephonic	Email from Christian regarding excel sheet of documents he has	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/25/2022	Communications Email or Telephonic	Email from Jeff Goldenberg regarding what is needed for mediation	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/25/2022	Communications Email or Telephonic	Review email from Christian regarding document production and email BWW my thoughts on it	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/25/2022	Communications Email or Telephonic	Call with Todd Naylor regarding document production	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
1/25/2022	Communications Email or Telephonic	Call with Brian Warwick regarding next steps and collecting certain	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
1/25/2022	Communications Email or Telephonic	Call with Chris Koerner about how complaint documents are dealt with	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
1/25/2022	Communications Email or Telephonic	Email to Brian Warwick summarizing the sales numbers and refund numbers	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
1/25/2022	Communications Email or Telephonic	Conference call with all counsel	0.3	Matthew	Peterson	Attorney	\$450.00	\$135.00
1/25/2022	Communications Email or Telephonic	Call from Class Member re: her experience	0.3	Janet	Varnell	Attorney	\$650.00	\$195.00
1/25/2022	Communications Email or Telephonic	phone call with BW regarding conference line; look up alternate conference line number; circulate to all counsel; call in to call; e-mail and e-mail team	0.4	Karen	Stroly	Paralegal	\$220.00	\$88.00
1/25/2022	Communications Email or Telephonic	Meeting with CK on Document review and looking for docs on refund numbers specifically. Index and circulation	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
1/25/2022	Communications Email or Telephonic	Meeting with BWW re: doc review and index	0.6	Christian	Koerner	Paralegal	\$220.00	\$132.00
1/25/2022	Communications Email or Telephonic	Call with Defense counsel on dates for exchanging settlement offers and plaintiff's document production	0.8	Brian	Warwick	Attorney	\$650.00	\$520.00
1/25/2022	Communications Email or Telephonic	Call with Todd and Jeff on missing discovery and info needed for demand and scheduling for production of documents.	1.1	Brian	Warwick	Attorney	\$650.00	\$715.00
1/25/2022	Drafting of Papers or Pleadings	Draft Jim and James responses to Requests for Production	1.0	Matthew	Peterson	Attorney	\$450.00	\$450.00
1/25/2022	Review Discovery Documents	Find documents showing yearly refund numbers for use in mediation statement.	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
1/25/2022	Review Discovery Documents	Review current iteration of index and hot docs	1.5	Brian	Warwick	Attorney	\$650.00	\$975.00
1/25/2022	Review Discovery Documents	Begin review and prep (conversion to pdf) for Zilinsky client docs for production	3.0	Christian	Koerner	Paralegal	\$220.00	\$660.00
1/25/2022	Review Discovery Documents	Begin collecting responsive documents out of the 300 reviewed the previous day, including condensing video files into zip format, so they can be produced.	4.5	Matthew	Peterson	Attorney	\$450.00	\$2,025.00
1/25/2022	Review Discovery Documents	Speed review of LeafFilter_022554 to LeafFilter_027555 for Deficiency	8.5	Christian	Koerner	Paralegal	\$220.00	\$1,870.00
1/25/2022	Review of Papers or Pleadings	letter deadline, will go back and catalogue next week	0.3	Christian	Koerner	Paralegal	\$220.00	\$66.00
1/26/2022	Communications Email or Telephonic	Review Motion to Stay	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/26/2022	Communications Email or Telephonic	Email from christian regarding unresovled claims in document production complaints	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/26/2022	Communications Email or Telephonic	Email from Christian regarding the content of document production of consumer complaints	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/26/2022	Communications Email or Telephonic	Email from Brian warwick regarding the content of consumer complaints, tells that we are looking for certain marketing documents	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/26/2022	Communications Email or Telephonic	Email to Brian Warwick of what we should include in the "additional questions" submitted to LF	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/26/2022	Communications Email or Telephonic	Email from Jeff Goldenburg regarding conversnation with damages	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/26/2022	Communications Email or Telephonic	Email to BWW regarding reminding document production	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00

1/26/2022	Communications Email or Telephonic	Call to Chris regarding how many documents remaining and memo	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
1/26/2022	Communications Email or Telephonic	Call with BWV regarding remaining documents	0.3	Matthew	Peterson	Attorney	\$450.00	\$135.00
1/26/2022	Communications Email or Telephonic	Call with Brian Warwick about the remaining documents we have to review and strategy of defining the class	0.4	Matthew	Peterson	Attorney	\$450.00	\$180.00
1/26/2022	Communications Email or Telephonic	Email to team: regarding what I believe needs to be added to "questions to LF" all the categories	1.0	Matthew	Peterson	Attorney	\$450.00	\$450.00
1/26/2022	Communications Email or Telephonic	Call with MTP re: docs	0.2	Christian	Koerner	Paralegal	\$220.00	\$44.00
1/26/2022	Review Discovery Documents	Review of LeafFilter_027556 to LeafFilter_031425 for Deficiency letter deadline, will go back and catalogue next week	8.4	Christian	Koerner	Paralegal	\$220.00	\$1,848.00
1/27/2022	Communications Email or Telephonic	Email from brian warwick regarding Service for Debris start outline for mediation statement. Include research on Conjoint	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
1/27/2022	Drafting of Papers or Pleadings	Analysis and experts	2.1	Brian	Warwick	Attorney	\$650.00	\$1,365.00
1/27/2022	Legal Research	Research theories of recovery	5.0	Matthew	Peterson	Attorney	\$450.00	\$2,250.00
1/27/2022	Review Discovery Documents	Locate requested hot docs on debris cleaning and charges, etc.; email to BWV; emails with co-counsel re: deficiency letter additions	1.0	Christian	Koerner	Paralegal	\$220.00	\$220.00
1/27/2022	Review Discovery Documents	Speed review of LeafFilter_031426 to LeafFilter_035425 for Deficiency letter deadline, will go back and catalogue next wee	8.2	Christian	Koerner	Paralegal	\$220.00	\$1,804.00
1/28/2022	Communications Email or Telephonic	Email from BWV regarding drafting a letter for mediation questions	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/28/2022	Communications Email or Telephonic	Review of document chart chris made of what he reviewed	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/28/2022	Communications Email or Telephonic	Email to and from BWV regarding thoughts on document log	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/28/2022	Communications Email or Telephonic	Email to and from BWV regarding thoughts on document log	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/28/2022	Communications Email or Telephonic	Email from Chris on his thoughts on draft letter to LF for mediation drafting a letter to LF counsel requesting documents and asking	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/28/2022	Communications Email or Telephonic	questions we need to prepare for mediation	0.6	Matthew	Peterson	Attorney	\$450.00	\$270.00
1/28/2022	Drafting of Papers or Pleadings	Review Leaffilter RFP's and ROG questions for Deficiency letter	0.5	Christian	Koerner	Paralegal	\$220.00	\$110.00
1/28/2022	Review Discovery Documents	Review of LeafFilter_035426 to LeafFilter_040783 for Deficiency letter deadline, will go back and catalogue next week	9.0	Christian	Koerner	Paralegal	\$220.00	\$1,980.00
1/30/2022	Communications Email or Telephonic	Emails with Christian regarding document production	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/30/2022	Review Discovery Documents	Prepare hard copy documents from files Zilinsky gave me, scan in	1.5	Matthew	Peterson	Attorney	\$450.00	\$675.00
1/30/2022	Review Discovery Documents	Review discovery documents for what hot docs to use at mediation, etc.	8.0	Christian	Koerner	Paralegal	\$220.00	\$1,760.00
1/31/2022	Communications Email or Telephonic	Email from Brian Warwick concerning documents	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/31/2022	Communications Email or Telephonic	Email from Brian Warwick concerning what to ask in letter to	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/31/2022	Communications Email or Telephonic	Email from Chris with marketing documents attached	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/31/2022	Communications Email or Telephonic	Email from Chris attacehd with several documents concerning advertisements to review	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
1/31/2022	Communications Email or Telephonic	Call with Brian and Chris regarding documents remaining	0.5	Matthew	Peterson	Attorney	\$450.00	\$225.00
1/31/2022	Drafting of Papers or Pleadings	Conversion of Zilinsky documents for Production	1.5	Christian	Koerner	Paralegal	\$220.00	\$330.00
1/31/2022	Mediation Preparation	Preparation for mediation	1.0	Christian	Koerner	Paralegal	\$220.00	\$220.00
1/31/2022	Mediation Preparation	Meeting re: what we need for the mediation, docs, etc.	1.0	Matthew	Peterson	Attorney	\$450.00	\$450.00
1/31/2022	Mediation Preparation	Meeting with Matt and Christian on documents produced and ads for use in mediation statement	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
1/31/2022	Review Discovery Documents	Further review and cataloguing of Leaffilter008004 to Leaffilter008625	5.0	Christian	Koerner	Paralegal	\$220.00	\$1,100.00
1/31/2022	Review of Papers or Pleadings	Review Jeff Goldenburg redline of letter to LF receive and review Joint Motion to Stay Proceedings pending mediation and Order granting same; add deadline to file joint report to calendar;	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
1/31/2022	Review of Papers or Pleadings	download and save to WD; update notes	0.5	Karen	Stroly	Paralegal	\$220.00	\$110.00
2/1/2022	Communications Email or Telephonic	Finalize letter to Greg on discovery still needed for mediation	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
2/2/2022	Communications Email or Telephonic	Email with Chris regarding how we will produce documents	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/2/2022	Communications Email or Telephonic	Email from Todd Naylor regarding draft discovery responses.	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/2/2022	Communications Email or Telephonic	Text to Jim Zilinsky to remind him to review IROG and to verify	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/2/2022	Drafting of Papers or Pleadings	Email from Jim Zinlinsky regarding feedback to IROG responses	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/2/2022	Drafting of Papers or Pleadings	Edits based on feedback from Jim and Gerrie Zilinsky	0.4	Matthew	Peterson	Attorney	\$450.00	\$180.00
2/2/2022	Drafting of Papers or Pleadings	Edits to Jim and Gerries IROG responses based on Todd Naylor's comments	1.0	Matthew	Peterson	Attorney	\$450.00	\$450.00
2/2/2022	Review Discovery Documents	Further review of complaints Leaffilter009206 to Leaffilter010605	8.2	Christian	Koerner	Paralegal	\$220.00	\$1,804.00

2/2/2022	Review of Papers or Pleadings	Email from Brian Warwick suggested edits	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
		Review letter from Greg Phillips regarding response to our mediation						
2/2/2022	Review of Papers or Pleadings	letter	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/2/2022	Review of Papers or Pleadings	Review Todd Naylor's IROG responses for his plaintiffs	0.4	Matthew	Peterson	Attorney	\$450.00	\$180.00
2/3/2022	Communications Email or Telephonic	Fax from Jim Zilinsky	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/3/2022	Communications Email or Telephonic	Email from Todd Naylor regarding RFP responses for his plaintiffs	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
		Edits to Gerrie and Jim Zilinsky RFPs based on Todd Naylor's						
2/3/2022	Drafting of Papers or Pleadings	comments and responses	1.0	Matthew	Peterson	Attorney	\$450.00	\$450.00
2/3/2022	Review Discovery Documents	Review Todd Naylor's responses to RFP for his plaintiffs	0.3	Matthew	Peterson	Attorney	\$450.00	\$135.00
2/3/2022	Review Discovery Documents	Further review of complaints Leafilter010606 to Leafilter012901	8.0	Christian	Koerner	Paralegal	\$220.00	\$1,760.00
2/4/2022	Communications Email or Telephonic	Call with Brian Warwick about IROG responses for Jim and Gerrie	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/4/2022	Communications Email or Telephonic	Emails from Todd Naylor regarding production	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/4/2022	Communications Email or Telephonic	Call with Chris regarding production	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/4/2022	Drafting of Papers or Pleadings	Edits to IROG for Jim and Jerrie	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
		Review, edit, finalize and send out Geraldine and James Zilinsky's						
2/4/2022	Review Discovery Documents	Responses to IROG's/RFP's along with supporting documentation	5.0	Christian	Koerner	Paralegal	\$220.00	\$1,100.00
2/7/2022	Communications Email or Telephonic	Email to chris regarding canceling deposition of Paul Lochner	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
		Review email from Brian warwick regarding next steps for settlement						
2/7/2022	Communications Email or Telephonic	structure	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/7/2022	Communications Email or Telephonic	Email from Jeff Goldenberg regarding his question about LF records	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/7/2022	Review Discovery Documents	Review of 1970 pages of Production 5 for use at mediation	7.2	Christian	Koerner	Paralegal	\$220.00	\$1,584.00
2/8/2022	Review Discovery Documents	More review of Complaints Bates Leafilter_021000-21600	3.5	Christian	Koerner	Paralegal	\$220.00	\$770.00
2/9/2022	Review Discovery Documents	Review Plaintiff's discovery responses and documents sent by co-	1.5	Christian	Koerner	Paralegal	\$220.00	\$330.00
2/9/2022	Review Discovery Documents	Review complaints from Production 5 Bates Leafilter_021601-22890	8.0	Christian	Koerner	Paralegal	\$220.00	\$1,760.00
2/10/2022	Communications Email or Telephonic	Email to Jeff Goldenberg regarding LF complaint retention	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/10/2022	Review Discovery Documents	Review complaints from Production 5 Bates Leafilter_022891-26514	8.0	Christian	Koerner	Paralegal	\$220.00	\$1,760.00
2/11/2022	Communications Email or Telephonic	Email from BWV regarding new discovery	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/11/2022	Review Discovery Documents	Review new documents	1.5	Matthew	Peterson	Attorney	\$450.00	\$675.00
2/15/2022	Communications Email or Telephonic	Email from Chris regarding the LF advertisement	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/15/2022	Communications Email or Telephonic	Email from BWV regarding compiling the best documents for	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/15/2022	Communications Email or Telephonic	Email from Jeff Goldenberg regarding consumer summary	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
		Email from mediation that mediation will be zoom. Notified BWV of						
2/15/2022	Communications Email or Telephonic	mistake	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
2/15/2022	Communications Email or Telephonic	Call with Todd about settlement structure	1.2	Brian	Warwick	Attorney	\$650.00	\$780.00
2/15/2022	Drafting of Papers or Pleadings	Research on similar construction defect cases	2.1	Brian	Warwick	Attorney	\$650.00	\$1,365.00
		Detailed Review of 500 pages of Claims in an attempt to find the most						
		useful examples for use at mediation and our mediation statement. Call						
2/15/2022	Review Discovery Documents	with Brian re: same	5.0	Christian	Koerner	Paralegal	\$220.00	\$1,100.00
2/17/2022	Communications Email or Telephonic	TC with Goldenberg about structure of settlement	1.1	Brian	Warwick	Attorney	\$650.00	\$715.00
2/17/2022	Drafting of Papers or Pleadings	Research on claims made settlementns involving construction	2.1	Brian	Warwick	Attorney	\$650.00	\$1,365.00
2/18/2022	Communications Email or Telephonic	email from Jeff Goldenberg and outline review	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
2/18/2022	Legal Research	review similar settlements for claim criteria	2.3	Brian	Warwick	Attorney	\$650.00	\$1,495.00
		Continued review of Customer Complaints for overflow and debris for						
2/25/2022	Review Discovery Documents	mediation statement	3.5	Christian	Koerner	Paralegal	\$220.00	\$770.00
3/1/2022	Drafting of Papers or Pleadings	Mediation statement draft	3.3	Brian	Warwick	Attorney	\$650.00	\$2,145.00
		Continued Review of Advanced Claims to be used in our Mediation						
3/1/2022	Review Discovery Documents	Statement	6.0	Christian	Koerner	Paralegal	\$220.00	\$1,320.00
3/2/2022	Drafting of Papers or Pleadings	Mediation statement	3.5	Brian	Warwick	Attorney	\$650.00	\$2,275.00
3/2/2022	Review Discovery Documents	Last bit of review for complaints to be used in our mediation statement.	6.0	Christian	Koerner	Paralegal	\$220.00	\$1,320.00
3/4/2022	Drafting of Papers or Pleadings	research other settlements for mediation	2.2	Brian	Warwick	Attorney	\$650.00	\$1,430.00
3/4/2022	Drafting of Papers or Pleadings	revise mediation statement	2.9	Brian	Warwick	Attorney	\$650.00	\$1,885.00
3/4/2022	Legal Research	Review filings and docket, send to BWV; emails re: same	0.7	Christian	Koerner	Paralegal	\$220.00	\$154.00
3/4/2022	Review of Papers or Pleadings	Mediation Statement; Discussion with Brian	1.2	Janet	Varnell	Attorney	\$650.00	\$780.00
3/5/2022	Communications Email or Telephonic	Emails regarding 26f and defense counsel	0.3	Janet	Varnell	Attorney	\$650.00	\$195.00
3/7/2022	Drafting of Papers or Pleadings	revise mediation statement	1.9	Brian	Warwick	Attorney	\$650.00	\$1,235.00

3/8/2022	Communications Email or Telephonic	Conversation with Brian Warwick re: settlement-related call; review email on same	0.3	Janet	Varnell	Attorney	\$650.00	\$195.00
3/8/2022	Communications Email or Telephonic	Telephone call with Greg Phillips (defense counsel) regarding our mediation statement. and email to my team relaying the conversation.	0.9	Brian	Warwick	Attorney	\$650.00	\$585.00
3/8/2022	Communications Email or Telephonic	Meeting with co-counsel before meeting with Defense counsel and plaintiff's team to discuss differences in damage calculations	1.5	Brian	Warwick	Attorney	\$650.00	\$975.00
3/8/2022	Drafting of Papers or Pleadings	Review and edit Mediation statement; finalize and email to defense counsel	2.0	Christian	Koerner	Paralegal	\$220.00	\$440.00
3/8/2022	Drafting of Papers or Pleadings	revise mediation statement and have calls with Jeff and Todd on changes to be made. Final review.	3.1	Brian	Warwick	Attorney	\$650.00	\$2,015.00
3/10/2022	Communications Email or Telephonic	Call from Hunter Hughes, Mediator	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
3/10/2022	Communications Email or Telephonic	Call with Todd and Jeff about call with Hunter and meanings for mediation and how to handle.	0.7	Brian	Warwick	Attorney	\$650.00	\$455.00
3/11/2022	Communications Email or Telephonic	Call with Jeff and Todd about mediator and Defendant's position	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
3/11/2022	Communications Email or Telephonic	Call with Hunter Hughes about mediation and relay of call to Jeff and Todd	0.7	Brian	Warwick	Attorney	\$650.00	\$455.00
3/14/2022	Meeting with Legal Team	Meeting with Brian to discuss the approach to mediation	0.5	Janet	Varnell	Attorney	\$650.00	\$325.00
3/14/2022	Meeting with Legal Team	Strategize with JRV re: mediation	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
3/16/2022	Appear at Hearings or Appearances	Travel to Atlanta for mediation and preparation	7.8	Janet	Varnell	Attorney	\$650.00	\$5,070.00
3/16/2022	Appear at Hearings or Appearances	Travel to Atlanta for mediation and preparation	7.8	Brian	Warwick	Attorney	\$650.00	\$5,070.00
3/16/2022	Communications Email or Telephonic	Call with Janet re clients for mediation	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
3/16/2022	Communications Email or Telephonic	Call with Jim re mediation	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
3/16/2022	Communications Email or Telephonic	Call to Todd Naylor's firm	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
3/16/2022	Communications Email or Telephonic	Second call with Jim and Gerrie on mediation	0.3	Matthew	Peterson	Attorney	\$450.00	\$135.00
3/17/2022	Appear at Hearings or Appearances	post mediation meeting with team in Atlanta to discuss details of Settlement structure	1.5	Brian	Warwick	Attorney	\$650.00	\$975.00
3/17/2022	Appear at Hearings or Appearances	Prepare for and Attend mediation with Hunter Hughes in Atlanta	8.7	Brian	Warwick	Attorney	\$650.00	\$5,655.00
3/17/2022	Legal Research	Research Class Action settlements and awards	2.0	Christian	Koerner	Paralegal	\$220.00	\$440.00
3/17/2022	Mediation Appearance	Mediation with Hunter Hughes and Defendant	8.0	Janet	Varnell	Attorney	\$650.00	\$5,200.00
3/17/2022	Meeting with Legal Team	After mediation debriefing	1.5	Janet	Varnell	Attorney	\$650.00	\$975.00
3/18/2022	Travel	Travel back to Florida from Atlanta - bad weather delayed in Atlanta airport	8.0	Brian	Warwick	Attorney	\$650.00	\$5,200.00
3/18/2022	Travel	Return home from Atlanta mediation - weather related delay	8.0	Janet	Varnell	Attorney	\$650.00	\$5,200.00
3/21/2022	Communications Email or Telephonic	Emails concerning status report to the court and mediation agreement	0.3	Janet	Varnell	Attorney	\$650.00	\$195.00
3/25/2022	Communications Email or Telephonic	TC with Hunter Hughes on settlement	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
3/25/2022	Communications Email or Telephonic	TC with Goldenberg and JRV on offer from Defense post mediation	1.1	Brian	Warwick	Attorney	\$650.00	\$715.00
3/29/2022	Communications Email or Telephonic	Review of exchanges with mediator and defendant to finalize settlement terms	0.4	Janet	Varnell	Attorney	\$650.00	\$260.00
3/29/2022	Communications Email or Telephonic	Meet with team on counteroffer and email drafted offer to mediator.	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
3/29/2022	Meeting with Legal Team	Call re: finalization of relief for the class in settlement	0.5	Janet	Varnell	Attorney	\$650.00	\$325.00
3/30/2022	Communications Email or Telephonic	email to Greg	0.1	Brian	Warwick	Attorney	\$650.00	\$65.00
3/30/2022	Communications Email or Telephonic	Call with Todd and Jeff and then Hunter.	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
3/30/2022	Mediation Appearance	T/C with Hunter Hughes and Plaintiff team to discuss final term issues	0.5	Janet	Varnell	Attorney	\$650.00	\$325.00
3/31/2022	Communications Email or Telephonic	spoke to Hunter on mediation	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
4/1/2022	Communications Email or Telephonic	Emails and Confer re: settlement	0.4	Janet	Varnell	Attorney	\$650.00	\$260.00
4/1/2022	Communications Email or Telephonic	spoke to Hunter on mediation and conveyed deal to team	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
4/1/2022	Drafting of Papers or Pleadings	Draft notice to Court	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
4/1/2022	Drafting of Papers or Pleadings	REview MOU and discuss my changes with Todd to circulate to	2.4	Brian	Warwick	Attorney	\$650.00	\$1,560.00
4/1/2022	Drafting of Papers or Pleadings	review and revise changes made by Defense counsel to MOU CMR	2.5	Brian	Warwick	Attorney	\$650.00	\$1,625.00
4/1/2022	Review of Papers or Pleadings	e-mail exchange and telephone call with BW	0.3	Karen	Stroly	Paralegal	\$220.00	\$66.00
4/4/2022	Communications Email or Telephonic	e-mail exchange with CK regarding mediation results	0.2	Karen	Stroly	Paralegal	\$220.00	\$44.00
4/7/2022	Meeting with Legal Team	T/C with Matt Peterson to discuss named plaintiffs position re settlement and approach	0.5	Janet	Varnell	Attorney	\$650.00	\$325.00
4/8/2022	Communications Email or Telephonic	draft email to Jim regarding sending papers	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00
4/8/2022	Communications Email or Telephonic	Email from Jim regarding setting a call and sending papers	0.2	Matthew	Peterson	Attorney	\$450.00	\$90.00

4/11/2022	Communications Email or Telephonic	Email to JRV regarding call w client	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
4/11/2022	Communications Email or Telephonic	Text to Jim regarding call	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
4/11/2022	Communications Email or Telephonic	Call with Jim Zilinsky regarding whether or not we can talk today	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
4/11/2022	Communications Email or Telephonic	Email from JVR regarding Zilinsky call	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
4/11/2022	Communications Email or Telephonic	Call with Zilinsky and Janet	1.0	Matthew	Peterson	Attorney	\$450.00	\$450.00
4/11/2022	Communications Email or Telephonic	Emails and document review to prepare to speak with clients;						
4/11/2022	Communications Email or Telephonic	conversation with clients re: damages and class settlement	2.2	Janet	Varnell	Attorney	\$650.00	\$1,430.00
4/12/2022	Communications Email or Telephonic	Draft email to clients re: class settlement and their options.	1.5	Janet	Varnell	Attorney	\$650.00	\$975.00
4/13/2022	Communications Email or Telephonic	Revised rule 26 reprot	0.2	Brian	Warwick	Attorney	\$650.00	\$130.00
4/19/2022	Communications Email or Telephonic	Call with team on class rep signatures for settlement agreement and class definition.	1.0	Brian	Warwick	Attorney	\$650.00	\$650.00
4/19/2022	Meeting with Legal Team	Discussion re: settlement class	0.5	Janet	Varnell	Attorney	\$650.00	\$325.00
5/4/2022	Communications Email or Telephonic	Email from Client re: settlement; T/C with clients re same	0.6	Janet	Varnell	Attorney	\$650.00	\$390.00
5/13/2022	Drafting of Papers or Pleadings	Revise settlement agreement	3.5	Brian	Warwick	Attorney	\$650.00	\$2,275.00
6/2/2022	Legal Research	Review claims made in complaint, etc. for settlement talks	2.0	Christian	Koerner	Paralegal	\$220.00	\$440.00
6/6/2022	Drafting of Papers or Pleadings	legal research on release language	2.0	Brian	Warwick	Attorney	\$650.00	\$1,300.00
6/7/2022	Drafting of Papers or Pleadings	Legal Research on releases	3.3	Brian	Warwick	Attorney	\$650.00	\$2,145.00
6/13/2022	Drafting of Papers or Pleadings	Review and revise Long Form Notice	1.5	Brian	Warwick	Attorney	\$650.00	\$975.00
6/15/2022	Communications Email or Telephonic	Spoke to Hunter Hughes about release and relayed conversation to my team.	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
6/16/2022	Communications Email or Telephonic	Details concerning remaining issues in settlement agreement - research and email communications and telephone calls	2.2	Janet	Varnell	Attorney	\$650.00	\$1,430.00
6/17/2022	Communications Email or Telephonic	Video conference with defense counsel re settlement agreement and notice	0.7	Janet	Varnell	Attorney	\$650.00	\$455.00
6/17/2022	Communications Email or Telephonic	Email to cocounsel re: settlement agreement changes, notice and claims administrator; contact claims administrator and send documents	1.2	Janet	Varnell	Attorney	\$650.00	\$780.00
6/17/2022	Communications Email or Telephonic	Emails from property damage clients; emails and T/C with defense re: settlement	2.5	Janet	Varnell	Attorney	\$650.00	\$1,625.00
6/17/2022	Legal Research	Property damage, similar merits for settlement, etc.	3.1	Janet	Varnell	Attorney	\$650.00	\$2,015.00
6/19/2022	Communications Email or Telephonic	Emails concerning drafting of notice, Mtn for Prelim approval; order and hiring of claims administrator	0.3	Janet	Varnell	Attorney	\$650.00	\$195.00
6/20/2022	Communications Email or Telephonic	Emails with cocounsel re: long form notice; review the redline of LFN	1.2	Janet	Varnell	Attorney	\$650.00	\$780.00
6/21/2022	Communications Email or Telephonic	T/C to Snow Wallace at KCC re: notice costs and proposal	0.3	Janet	Varnell	Attorney	\$650.00	\$195.00
6/21/2022	Drafting of Papers or Pleadings	Review emails and changes to SA from Defense and email back comments to my team on potential changes.	1.5	Brian	Warwick	Attorney	\$650.00	\$975.00
6/21/2022	Drafting of Papers or Pleadings	Draft Order on Prelimin App	4.0	Brian	Warwick	Attorney	\$650.00	\$2,600.00
6/21/2022	Meeting with Legal Team	calls/emails re: Prel App order and MOL; review files to determine language to be inserted in PA order	0.5	Karen	Stroly	Paralegal	\$220.00	\$110.00
6/22/2022	Communications Email or Telephonic	Numerous emails to opposing counsel on declaration for settlement	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
6/22/2022	Drafting of Papers or Pleadings	Declaration of Brian Warwick	3.0	Christian	Koerner	Paralegal	\$220.00	\$660.00
6/22/2022	Drafting of Papers or Pleadings	Continue drafting order on preliminary app.	4.3	Brian	Warwick	Attorney	\$650.00	\$2,795.00
6/22/2022	Drafting of Papers or Pleadings	Drafting Motion for Preliminary Approval and revise Notice Form.	4.9	Brian	Warwick	Attorney	\$650.00	\$3,185.00
6/22/2022	Review of Papers or Pleadings	Review notice and brief edits	1.0	Janet	Varnell	Attorney	\$650.00	\$650.00
6/23/2022	Review of Papers or Pleadings	Review of final settlement agreement changes	0.4	Janet	Varnell	Attorney	\$650.00	\$260.00
6/24/2022	Drafting of Papers or Pleadings	Review draft of KCC declaration	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
6/24/2022	Drafting of Papers or Pleadings	Review/edits to Memo in Support of Preliminary Approval and Declaration of BWV; emails re: same and information to include	2.0	Christian	Koerner	Paralegal	\$220.00	\$440.00
6/24/2022	Drafting of Papers or Pleadings	Revise SA and BW Declaration. Execute SA and review changes proposed by Defendant	3.0	Brian	Warwick	Attorney	\$650.00	\$1,950.00
6/24/2022	Review of Papers or Pleadings	Review of affidavit and emails re: Class administrator	0.8	Janet	Varnell	Attorney	\$650.00	\$520.00
6/28/2022	Review of Papers or Pleadings	Amended Settlement and settlement docs	1.1	Christian	Koerner	Paralegal	\$220.00	\$242.00
7/25/2022	Communications Email or Telephonic	Emails re: AG meeting and addressing their questions	0.5	Janet	Varnell	Attorney	\$650.00	\$325.00
7/25/2022	Communications Email or Telephonic	Call with team and email to AG group on meeting on Friday.	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
7/29/2022	Communications Email or Telephonic	talked to Defense counsel	0.3	Brian	Warwick	Attorney	\$650.00	\$195.00
7/29/2022	Communications Email or Telephonic	Call with Jeff about Call with AGs	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00

7/29/2022	Communications Email or Telephonic	TC with AGs from 7 states, about the settlement	1.9	Brian	Warwick	Attorney	\$650.00	\$1,235.00
7/29/2022	Meeting with Legal Team	Meeting with BW re: AG meeting with all counsel	0.5	Janet	Varnell	Attorney	\$650.00	\$325.00
7/29/2022	Review of Papers or Pleadings	Review of Motion for Approval of Class Action Settlement before	4.0	Christian	Koerner	Paralegal	\$220.00	\$880.00
8/9/2022	Review of Papers or Pleadings	BWW's call with Attorney Generals; emails/calls re: same	0.8	Janet	Varnell	Attorney	\$650.00	\$520.00
8/18/2022	Settlement	Review of Preliminary approval order	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
8/25/2022	Communications Email or Telephonic	Call with Greg on URL and email to settlemetn admin	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
10/12/2022	Communications Email or Telephonic	email to client with status	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
10/12/2022	Communications Email or Telephonic	Call with class member Silva	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
10/12/2022	Meeting with Legal Team	Call with class member Bailey	0.5	Brian	Warwick	Attorney	\$650.00	\$325.00
		emails/phonecalls re: class member calls; review Prelim App. Order	0.5	Karen	Stroly	Paralegal	\$220.00	\$110.00
10/13/2022	Communications Email or Telephonic	T/C with class member regarding their damages and the notice and claims process	0.2	Janet	Varnell	Attorney	\$650.00	\$130.00
10/13/2022	Communications Email or Telephonic	T/C with class member regarding their damages and the notice and claims process	0.4	Janet	Varnell	Attorney	\$650.00	\$260.00
10/14/2022	Communications Email or Telephonic	T/C with class member regarding their damages and the notice and claims process	0.4	Janet	Varnell	Attorney	\$650.00	\$260.00
10/14/2022	Settlement	Order regarding class notice; telephone call BW; voicemails from class members	0.5	Karen	Stroly	Paralegal	\$220.00	\$110.00
10/17/2022	Communications Email or Telephonic	email to Duncan	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/17/2022	Communications Email or Telephonic	Email to Mrs. Duncan re out	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/17/2022	Communications Email or Telephonic	email from Mrs Duncan re opt out	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/17/2022	Communications Email or Telephonic	email from Duncan re opt out	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/17/2022	Communications Email or Telephonic	email from BWW re out out	0.1	Matthew	Peterson	Attorney	\$450.00	\$45.00
10/17/2022	Communications Email or Telephonic	T/C with class member regarding their damages and the notice and claims process	0.3	Janet	Varnell	Attorney	\$650.00	\$195.00
10/17/2022	Review of Papers or Pleadings	Review claim website to see where opt out information is located	0.3	Matthew	Peterson	Attorney	\$450.00	\$135.00
10/18/2022	Meeting with Legal Team	Discuss and strategize case	0.1	Karen	Stroly	Paralegal	\$220.00	\$22.00
10/19/2022	Settlement	e-mail exchanges regarding objections and opt outs, receive and review objection	0.5	Karen	Stroly	Paralegal	\$220.00	\$110.00
10/20/2022	Communications Email or Telephonic	T/C with class member regarding their damages and the notice and claims process	0.3	Janet	Varnell	Attorney	\$650.00	\$195.00
10/21/2022	Settlement	receive and review e-mail exchange regarding correspondence received from class member; review letter; attempt to locate telephone number	0.5	Karen	Stroly	Paralegal	\$220.00	\$110.00
10/24/2022	Communications Email or Telephonic	T/C with absent class members to discuss their damages and specific situation	0.4	Janet	Varnell	Attorney	\$650.00	\$260.00
10/24/2022	Legal Research	Issue of proper method of valuation; exemplar Motions for filings	3.0	Janet	Varnell	Attorney	\$650.00	\$1,950.00
10/25/2022	Settlement	Call to class member Doctor	0.6	Brian	Warwick	Attorney	\$650.00	\$390.00
11/4/2022	Drafting of Papers or Pleadings	Review and revise of Memorandum of law on attorney fees	1.4	Brian	Warwick	Attorney	\$650.00	\$910.00
11/4/2022	Drafting of Papers or Pleadings	Preparing my declaration in support of attorney fees	2.1	Brian	Warwick	Attorney	\$650.00	\$1,365.00
TOTALS			861.2					<u>\$381,720.00</u>

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**DECLARATION OF JEFFREY S. GOLDENBERG IN SUPPORT OF
PLAINTIFFS' MOTION FOR ATTORNEY FEES, EXPENSE REIMBURSEMENT,
AND SERVICE AWARDS.**

1. I am a partner and founder in the law firm Goldenberg Schneider, LPA (“GS”), which is one of the firms representing Plaintiffs and the Class in this action. I make this Declaration of my own personal knowledge, and if called to do so, I could testify competently to the matters stated herein.

3. I am admitted to the practice of law in the State of Ohio (1994), the United States Court of Appeals for the Sixth Circuit, Second Circuit, and Ninth Circuit, the United States District Court for the Southern and Northern Districts of Ohio, and the Northern District of Illinois. I also have been admitted pro hac vice to various federal district courts throughout the United States. I am a member in good standing of the Ohio Bar and have never been the subject of any disciplinary proceeding.

4. I have been practicing law for twenty-eight years. I have served as lead or co-lead counsel on numerous nationwide class actions and have substantial experience litigating class actions and complex civil litigation, including product defect class actions representing consumers. I have been involved in all aspects of this case since we began investigating the claims before the complaint was filed.

5. I previously filed with this Court my firm and attorney profile describing my professional background and qualifications to serve as Class Counsel (Dkt. No. 56, attachment 9).

6. This declaration generally summarizes the work performed by GS on behalf of Plaintiffs and the Settlement Class Members in this Action. I have overseen and managed GS's attorneys and staff during this litigation and am familiar with every aspect of this case – beginning with our initial investigation through the implementation of this Settlement. As demonstrated below, GS and Varnell and Warwick (“VW”) have worked diligently to perform tasks throughout the entire course of this litigation so that we would be in a position to vigorously prosecute this matter and negotiate and evaluate the proposed settlement, including conducting the initial case investigation, drafting of the initial and First Amended Class Action Complaint, extensive interviewing of Plaintiffs and more than 100 absent class members that

contacted us during the course of the litigation, collecting and reviewing documents, conducting legal research, drafting motions and briefs, participating in case strategy conferences which included settlement discussions and the mediation process which lasted several months under the direction and guidance of Hunter Hughes, Esq., preparing settlement documents, designing and overseeing the implementation of the notice plan, communicating with class members who had questions or comments about the proposed settlement, seeking preliminary approval of this Settlement, and assisting with and overseeing the implementation of the Settlement.

7. By closely coordinating Class Counsel's activities and by assigning various attorneys to identifiable and specific tasks, I was able to ensure that the work performed was allocated appropriately, performed efficiently, and was not repetitive. Because of this regular communication, the work performed by Class Counsel was non-duplicative and necessary to meet the obligations associated with this litigation.

8. The table below details the hours billed and the amount billed at current rates through November 4, 2022, for GS' attorneys, paralegals, and legal assistants on this action:

Name	Experience	Position	Total Hours	Hourly Rate	Lodestar
Jeffrey S. Goldenberg	28 years	Partner	135.5	\$700	\$94,850
Todd B. Naylor	25 years	Partner	347.4	\$650	\$225,810
Robert B. Sherwood	20 years	Partner	129.5	\$600	\$77,700
Stephanie Vaaler	35 years	Paralegal	72.4	\$175	\$12,670
Cheryl Pence	35 years	Legal Assistant	64.7	\$150	\$9,705
TOTAL			749.50		\$420,735

This Summary was prepared from contemporaneous, daily time records regularly prepared and maintained by GS during the regular course of its business operation. My firm's daily time records are attached to this Declaration as Exhibit 1.

9. The GS personnel listed above billed their time at their usual and customary hourly billing rates, which have been approved by courts presiding over similar complex class action lawsuits at or near the rates presented above, and which are commensurate with the prevailing market rates for legal professionals of comparable experience and skill handling complex litigation. For example, I was approved at \$750 per hour and Ms. Pence was approved at \$150 per hour in *Sarah Hill et al v. Canidae Corporation*, Case No. 5:20-cv-01374-JGB-SP (C.D. Cal) (Doc. No. 79). On April 22, 2021, I submitted the following hourly rates to the Federal District Court in New Jersey in *In Re: Mercedes-Benz Emission Litigation*, Case No. 2:16-cv-00881-KM-ESK, to support Class Counsel's fee petition: Jeffrey Goldenberg: \$775; Todd Naylor: \$700; Robert Sherwood: \$650; and Cheryl Pence: \$150. (Doc. No. 312-2, Ex. 4). The Court granted Class Counsel's fee petition on July 12, 2021 (Doc. No. 341). On December 3, 2021, I submitted the following hourly rates to the Federal District Court, Southern District of New York in *Culbertson, et al. v. Deloitte Consulting LLP*, Case No. 1:20-cv-3962-LJL, to support Class Counsel's fee petition: Jeffrey Goldenberg: \$750; Todd Naylor: \$675; Robert Sherwood: \$625; Stephanie Vaaler: \$175; and Cheryl Pence: \$150. (Doc. No. 146). The Court granted Class Counsel's fee petition on February 16, 2022 (Doc. No. 159). *See also, Margery Newman v. Metropolitan Life Insurance Company*, U.S. District Court, Northern District of Illinois, Case No. 1:16-cv-03530.

10. During the course of this Action, GS incurred \$14,757.36 in unreimbursed expenses. I exercised judgment to ensure that these expenses are of the type routinely charged to hourly clients, are appropriately documented, and are reasonably and necessarily incurred in connection with the prosecution of this litigation. These expenses are reflected in the books and records of GS, and are detailed by category in the following chart:

CATEGORY	EXPENSE AMOUNT
Photocopy Costs	\$170.17
Court Costs, Filing Fees	\$402.00
Delivery/Courier/Postage	\$11.75
Carfare, Travel and Meals	\$2,435.66
Legal Research	\$1,612.78
Expert	\$5,000.00
Mediator (Hunter Hughes)	\$5,125.00
TOTAL	\$14,757.36

11. Based upon my review of GS' contemporaneous time records, and those of VW, Class Counsel have collectively worked 1,610.7 hours in this litigation. These hours billed by Class Counsel were reasonable, appropriate, and necessary for the effective prosecution of this case.

12. At their usual and customary rates and applying the rates in existence at the time the work was undertaken, these hours translate to a total lodestar for all Class Counsel of \$802,455 for this litigation.

13. Based upon my review of GS' contemporaneous expense records, and those of VW, Class Counsel have collectively incurred \$25,583.69 in reasonable and necessary litigation costs and expenses.

14. Class Counsel's efforts in this litigation were the only way Plaintiffs and the Class would receive any benefits to address the Debris Accumulation issues. Plaintiff's counsel in such cases are typically retained on a contingent basis due to the huge commitment of time and expense required relative to the losses suffered by an individual representative plaintiff. Both of the firms representing Plaintiffs in this action agreed to do so on a wholly contingent basis.

15. Class Counsel assumed substantial risk by undertaking this litigation and achieved a significant benefit to the Class.

16. The \$25,583.69 in expenses incurred during this case include all filing, general litigation, and mediation-related expenses and were incurred in the normal course of business and were essential to the successful prosecution of this lawsuit. None of Class Counsel's expenditures have yet been reimbursed.

17. Class Counsel respectfully requests a modest service award of \$3,500 for the named Plaintiffs (one award per household) for their active participation in this Action. Without the named Plaintiffs' willingness to litigate their claims, this Settlement and the benefits offered to the Class therein would not have occurred.

18. The Settlement Class in this case consists of 57,704 Settlement Class Members.

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

Dated: November 7, 2022

/s/ Jeffrey S. Goldenberg
Jeffrey S. Goldenberg



Goldenberg Schneider, LPA

4445 Lake Forest Drive, Ste 490
Cincinnati, OH 45242

Telephone: (513) 345-8291

November 7, 2022

Invoice submitted to:

In Reference To:

Invoice No.: 17097

For Professional Services Rendered:

		<u>Hrs/Rate</u>	<u>Amount</u>
10/23/2020	JSG Leaf Filter investigation. Call with Brian, Matt, and Janet.	0.50 \$700.00/hr	\$350.00
	TBN review potential draft complaint and send thoughts to jeff (.5) / look for arbitration clause online (.4)	0.90 \$650.00/hr	\$585.00
10/26/2020	JSG Leaf Filter Investigation. Reviewed prior published decisions in AG file (1.2). Emails to and from team re: contract terms, warranty booklet, etc. (0.4)	1.60 \$700.00/hr	\$1,120.00
	RBS Leaf Filter: Research CSPA authorities in the Ohio AG PIF (1.9); emails re same (.1).	2.00 \$600.00/hr	\$1,200.00

		<u>Hrs/Rate</u>	<u>Amount</u>
10/26/2020	TBN look for other cases where leaf filter was sued or involved in litigation (.7)/ check for arbitration agreements on website (.3)/ look at potential client's docs (.7)	1.70 \$650.00/hr	\$1,105.00
11/3/2020	JSG Leaf Filter Investigation. Emails to and from team re: setting up conference call for Friday.	0.40 \$700.00/hr	\$280.00
11/6/2020	JSG Leaf Filter Gutter Guards - Prepared for and attended conference call with team.	0.90 \$700.00/hr	\$630.00
	RBS Leaf Filter Investigation: Conference call	0.50 \$600.00/hr	\$300.00
	TBN Research to prep for call with referring counsel (1.4) hold call (.5)	1.90 \$650.00/hr	\$1,235.00
11/9/2020	TBN Research- leaffilter facts and scope of problem	1.90 \$650.00/hr	\$1,235.00
11/10/2020	JSG Leaf Filter Investigation - emails to and from team.	0.40 \$700.00/hr	\$280.00
11/11/2020	JSG Leaf Filter Investigation - reviewed youtube video of customer complaining about gutter performance (0.9). Emails to and from team re: theory of case (0.5).	1.40 \$700.00/hr	\$980.00
11/13/2020	JSG Reviewed brochure provided by client (0.3). Email to team re: FAQ misrepresentation (0.2).	0.50 \$700.00/hr	\$350.00
	RBS Research authorities in Ohio AG public information file for inclusion in CSPA count (.7); emails re same (.1).	0.80 \$600.00/hr	\$480.00
	RBS Telephone conference re case strategy	1.00 \$600.00/hr	\$600.00

		<u>Hrs/Rate</u>	<u>Amount</u>
11/13/2020	JSG Prepared for and attended Leaf Filter conference call with team (1.0). Reviewed ND Ohio case law forwarded by co-counsel re: CSPA applicability to out of state consumers (0.6). Email to team re: case law review re: Ohio CSPA applying to out of state plaintiffs (0.4).	2.00 \$700.00/hr	\$1,400.00
11/16/2020	TBN work on new complaint	3.50 \$650.00/hr	\$2,275.00
11/17/2020	JSG Reviewed and edited draft complaint (2.5). Email to team transmitting same (0.1).	2.60 \$700.00/hr	\$1,820.00
	RBS Edits to draft complaint (1.9); emails re same (.1).	2.00 \$600.00/hr	\$1,200.00
	TBN finalize draft complaint and send to bob and jeff for internal review	4.90 \$650.00/hr	\$3,185.00
11/18/2020	JSG Reviewed edits to draft complaint (0.3). Investigation of LeafFilter company (0.2). Email to team re: same (0.2).	0.70 \$700.00/hr	\$490.00
	TBN work with bob's edits to complaint (1.7) draft email re: new potential theory and send to co-counsel (.8)	2.50 \$650.00/hr	\$1,625.00
11/19/2020	TBN Research online for pre-sale complaints to include in the complaint (2.5)/ follow up with co-counsel re: how these fit within the theory we are proposing (.4)	2.90 \$650.00/hr	\$1,885.00
11/24/2020	JSG Researched for negative reviews (0.8). Set up call with co-counsel re: discussing amending complaint (0.1).	0.90 \$700.00/hr	\$630.00
	JSG Strategy conference call with team re: approach to adopt in the Complaint.	0.50 \$700.00/hr	\$350.00

		<u>Hrs/Rate</u>	<u>Amount</u>
11/24/2020	JSG Reviewed letter from Janet Varnell.	0.30 \$700.00/hr	\$210.00
	RBS Telephone conference re case strategy and proposed edits to complaint	0.50 \$600.00/hr	\$300.00
	TBN Telephone conference with team re: new theory (.5)/ prep for call (0.1)	0.60 \$650.00/hr	\$390.00
12/1/2020	TBN rework complaint to focus on larger defect issue (2.9) / OAG inspection file review to find best cases to support our CSPA claim (3)	5.90 \$650.00/hr	\$3,835.00
12/2/2020	TBN Finalize complaint based on co-counsel edits and jeff edits, update and confirm all footnotes	5.20 \$650.00/hr	\$3,380.00
12/3/2020	JSG Conference with T. Naylor and R. Sherwood re: research on division in ND to which the case can get sent.	0.20 \$700.00/hr	\$140.00
	JSG Finalized edits to Complaint (1.4); emailed same to C. Pence; emails to and from team re: same (0.2).	1.60 \$700.00/hr	\$1,120.00
	CP Prepared Civil Cover Sheet (.5); added signature block to Complaint (.5); emails and phone calls with Jeff Goldenberg re: filing (1); filed new case with Court via ECF (1.4).	3.40 \$150.00/hr	\$510.00
	RBS research on best venue (1.6); draft memo summarizing same (1.5); distribute same (.1). Research N.D. Ohio method for assigning cases (.2); emails re same (.1).	3.50 \$600.00/hr	\$2,100.00
	TBN Research venue based on Jeff's question (1.2); trade emails on implications (.6)/ research and redraft personal jurisdiction (2.2)	4.00 \$650.00/hr	\$2,600.00

			<u>Hrs/Rate</u>	<u>Amount</u>
12/7/2020	CP	Prepared Notice and Waiver forms (.6); served Complaint via Certified Mail (.4).	1.00 \$150.00/hr	\$150.00
	JSG	Call with C. Pence re: serving the complaint.	0.20 \$700.00/hr	\$140.00
12/15/2020	JSG	Emails to and from team re: collecting docs from Iowa consumer.	0.40 \$700.00/hr	\$280.00
12/17/2020	JSG	Reviewed emails from Maryland homewoners; emails to and from T. Naylor re: same.	0.30 \$700.00/hr	\$210.00
12/18/2020	TBN	review materials provided by new potential class rep and research on the ice dam concept (1.3)/ respond to set up call (.1)	1.40 \$650.00/hr	\$910.00
	JSG	Reviewed T. Naylor's email to Maryland consumers.	0.20 \$700.00/hr	\$140.00
12/21/2020	JSG	Prepared for and attended call with Maryland LeafFilter consumer.	0.80 \$700.00/hr	\$560.00
	TBN	Telephone conference with cory simpson (1.2) / prep for call (.7)/ type up summary of call and distribute to team after (.5)	2.40 \$650.00/hr	\$1,560.00
12/22/2020	JSG	Reviewed emails from team re: Maryland consumers; emails from Maryland consumers.	0.40 \$700.00/hr	\$280.00
	CP	Phone call to Alan Armstrong to get details re: his LeafFilter issues.	0.50 \$150.00/hr	\$75.00
	TBN	follow up with new leads (.8)/ draft intake memo and give to cheryl and stephanie to use for calls with new plaintiffs (.9)	1.70 \$650.00/hr	\$1,105.00
12/23/2020	TBN	review email from cheryl re: intake	0.40 \$650.00/hr	\$260.00

		<u>Hrs/Rate</u>	<u>Amount</u>
12/28/2020	CP Created contact chart (.4); calls to interview Kofahl and Renda (.6); added into to chart (.2).	1.20 \$150.00/hr	\$180.00
	TBN talk with potential intake	0.70 \$650.00/hr	\$455.00
12/29/2020	CP Follow up call with Kofahl (.2), updated chart (.1); email to JSG, TBN, RBS, and SV with Kofahl details (.2).	0.50 \$150.00/hr	\$75.00
	TBN review intake notes and follow up with potential class rep	0.70 \$650.00/hr	\$455.00
12/30/2020	CP Follow-up phone call with Renda, potential class member/rep (.3); emailed his info to JSG, TBN, and SV (.2).	0.50 \$150.00/hr	\$75.00
	JSG Reviewed emails from consumers re: complaints about LeafFilter gutters.	0.40 \$700.00/hr	\$280.00
12/31/2020	JSG Call to consumer Simpson - left VM. Follow up email to T. Naylor.	0.20 \$700.00/hr	\$140.00
1/4/2021	CP Filed Waiver of Notice with the Court via ECF.	0.30 \$150.00/hr	\$45.00
	JSG Reviewed return of waiver of service from defense counsel (0.1); email to C. Pence to file waiver (0.1).	0.20 \$700.00/hr	\$140.00
1/5/2021	JSG Reviewed email about potential class rep from Oregon (0.1); emails to and from T. Naylor re: same (0.1). Reviewed additional email summaries about consumers that have contacted GS (0.3).	0.50 \$700.00/hr	\$350.00

			<u>Hrs/Rate</u>	<u>Amount</u>
1/5/2021	TBN	review docs from new potential class reps and notes from interviews with them (2)/ follow up for missing details (.9)	2.90 \$650.00/hr	\$1,885.00
1/6/2021	CP	Set up LeafFilter counsel email group in shared contacts.	0.30 \$150.00/hr	\$45.00
	CP	Drafted template for co-counsel's PHV motions (.6) and sent to Florida co-counsel (.1).	0.70 \$150.00/hr	\$105.00
	RBS	Research and analysis R.C. 1345.092 right to cure provision (1.8); emails re same (.2).	2.00 \$600.00/hr	\$1,200.00
1/7/2021	TBN	Research cure offer from leaf filter (1.5); take my research and bob's and send to team (.2); review new potential class rep docs and send request for follow up (.8)	2.50 \$650.00/hr	\$1,625.00
	JSG	Reviewed emails from team re: response to defendant's individual settlement letter.	0.40 \$700.00/hr	\$280.00
1/11/2021	CP	Emails from/to Kofahl (.3); emailed her Wells Fargo Arbitration Agreement to Todd N. and Jeff G (.1).	0.40 \$150.00/hr	\$60.00
	RBS	Review and analyze arbitration clause (0.2); emails re same (.1)	0.30 \$600.00/hr	\$180.00
	TBN	review potential class rep docs (.3)/ analyze arbitration clause in wells fargo agreement (.6)/ send to bob for his thoughts with mine (.1)	1.00 \$650.00/hr	\$650.00
1/12/2021	JSG	Reviewed Wells Fargo credit card arbitration provision (0.2); emails to and from T. Naylor re: same (0.2).	0.40 \$700.00/hr	\$280.00

			<u>Hrs/Rate</u>	<u>Amount</u>
1/12/2021	JSG	Reviewed LF's offer to cure (0.1); emails to and from team re: response to offer to cure and whether we need to file response with the Court (0.3).	0.40 \$700.00/hr	\$280.00
1/22/2021	JSG	Team conference call re: amended complaint strategy and new plaintiffs.	0.60 \$700.00/hr	\$420.00
	RBS	Strategy Call with co-counsel	0.50 \$600.00/hr	\$300.00
	TBN	Telephone conference with team (.5); prep for call (.7)	1.20 \$650.00/hr	\$780.00
1/29/2021	SAV	Emails from/to team re lead.	0.10 \$175.00/hr	\$17.50
	SAV	Phone conference with lead.	0.50 \$175.00/hr	\$87.50
	JSG	Reviewed VM from potential class rep. forwarded same to Cheryl and Stephanie to call and follow up.	0.20 \$700.00/hr	\$140.00
	SAV	Updated contact chart	0.10 \$175.00/hr	\$17.50
2/1/2021	TBN	Research re: rejection of "cure offer" and the impact and review of Michael's research and comments (1.3)/ discuss with bob (.2)/ redline letter (.4)	1.90 \$650.00/hr	\$1,235.00
2/4/2021	TBN	work on rejection of cure offer (.7)/ prepare notice of filing rejection after confirming we should file (.3)	1.00 \$650.00/hr	\$650.00

			<u>Hrs/Rate</u>	<u>Amount</u>
2/4/2021	CP	File Notice of Filing of Rejection of Cure Offer (via ECF (.3); email to Florida co-counsel with reminder about filing their motions for PHV admission (.1).	0.40 \$150.00/hr	\$60.00
	JSG	Reviewed offer rejection letter and emails to and from team about filing same with the Court.	0.40 \$700.00/hr	\$280.00
	JSG	Emails to and from T. Naylor re: whether we should file our letter response to LeafFilter's individual settlement offer.	0.40 \$700.00/hr	\$280.00
2/5/2021	CP	Emails from/to Ashleigh Wallace of Varnell & Warwick (.3); email to JSG (.1); finalized and filed motions for PHV admission of Janet Varnell and Matthew Peterson (.6).	1.00 \$150.00/hr	\$150.00
2/8/2021	CP	Resubmitted Matthew Peterson's Motion for PHV admission to the Court (correcting COGS).	0.40 \$150.00/hr	\$60.00
2/9/2021	CP	Finalized and filed Brian Warwick's Motion for PHV admission with the Court.	0.40 \$150.00/hr	\$60.00
2/10/2021	JSG	Emails to and from team to set up strategy call tomorrow. Set up call.	0.40 \$700.00/hr	\$280.00
	JSG	Reviewed website lead and email from C. Pence.	0.20 \$700.00/hr	\$140.00
	CP	Finalized and filed Amended Motion for PHV for Janet Varnell (.4) emails to/from Crumpton re setting up a phone call re her inquiry (.3).	0.70 \$150.00/hr	\$105.00
2/11/2021	JSG	Strategy call re: Defendant's motion to dismiss.	0.50 \$700.00/hr	\$350.00
	CP	Phone call with Crumpton (.5); added details to lead chart (.3); email to JSG, TBN, SV (.2).	1.00 \$150.00/hr	\$150.00

		<u>Hrs/Rate</u>	<u>Amount</u>
2/11/2021	RBS Strategy call re MTD Opp.	0.60 \$600.00/hr	\$360.00
	TBN Telephone conference re: strategy in opposing motion to dismiss (.5)/ research their brief and arguments prior to call (1.9)	2.40 \$650.00/hr	\$1,560.00
	JSG Reviewed fact summary of Georgia LeafFilter purchaser. Email to team re: same.	0.20 \$700.00/hr	\$140.00
2/16/2021	CP Phone call w/ Renda re: sending his documents (.1); emails to/from Armstrong and Crumpton re: status of their document submission (.2). Saved Renda docs to WD (.2).	0.50 \$150.00/hr	\$75.00
	TBN vet new plaintiffs (.8)/ research on available claims in light of motion to dismiss (2.1)	2.90 \$650.00/hr	\$1,885.00
	SAV Email to lead re request for documents (.1). Ph. message re same and emails from/to TBN re same (.1). Reviewed lead chart for status of docs.(.2) Phone calls to Lackawanna Cts. re Renda docket sheet and Online search for same (.3). Email to TBN re docket sheet (.1). Email from/to Graham Jones re docs received and email to TBN re same (.1).	0.90 \$175.00/hr	\$157.50
2/17/2021	TBN vet possible plaintiffs and work on new claims	1.50 \$650.00/hr	\$975.00
2/18/2021	CP Phone call to lead to advise her of TBN & JSG suggestion for her situation	0.20 \$150.00/hr	\$30.00
	TBN prep for call with brian re: MTD(.6)/ talk with potential class reps (.7) / call with brian (.6)	1.90 \$650.00/hr	\$1,235.00
2/19/2021	CP Phone call to Kofahl to set up phone conf. w/TBN on Monday 2/22, and emailed her the R&R for review (.3); phone call with CA	1.00 \$150.00/hr	\$150.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		consumer Vogel to get details of her LF purchase/issues (.3); emailed to JSG, TBN, and SV (.1). Updated lead chart (.3).		
2/19/2021	TBN	work with potential plaintiff from missouri who mentioned a new type of filter screen	0.70 \$650.00/hr	\$455.00
2/22/2021	CP	Emails to/from Kofahl (.2); emails to Dering and Cox re their inquiries (.2); phone call and emails to/from Vogel re setting up a phone conference with TBN and requesting a copy of her LF contract (.5).	0.90 \$150.00/hr	\$135.00
	TBN	Phone call from clients in maryland and missouri (1.3)/ prep for calls (.7)/ send follow up emails with requests for more info (.5)	2.50 \$650.00/hr	\$1,625.00
2/23/2021	CP	Email to Bonifield re his website inquiry about LF case.	0.20 \$150.00/hr	\$30.00
	RBS	Telephone call with T. Naylor re potential edits to motion for extension (.2); review Fed. R. Civ. P. 15 re same (.1).	0.30 \$600.00/hr	\$180.00
	JSG	Strategy conference with T. Naylor re: extension for amended complaint.	0.20 \$700.00/hr	\$140.00
	TBN	draft motion and order for extension (1.2)/ call with defendant re: same (.2)	1.40 \$650.00/hr	\$910.00
	TBN	Phone call from client- california (1)/ prep for call and send follow ups (.4)/ research on the larger holes the missouri rep was talking about (1.1)	2.50 \$650.00/hr	\$1,625.00
2/24/2021	JSG	Conference with T. Naylor re: California leaf filter consumer status.	0.40 \$700.00/hr	\$280.00

		<u>Hrs/Rate</u>	<u>Amount</u>
2/24/2021	TBN prepare for all contingencies given tight deadlines and uncertain status of plaintiffs by drafting amended complaint with no new plaintiffs, amended complaint with just maryland, and amended complaint with maryland and missouri (3)/ work on california claims for potential new plaintiff and calls with her (1.7)	4.70 \$650.00/hr	\$3,055.00
2/25/2021	CP Finalized and filed Motion for Extension of Time to Respond to Motion to Dismiss (.6); emailed Word version of proposed order to Judge Watson (.2); emails to/from Brian Dering re: scheduling phone call (.2).	1.00 \$150.00/hr	\$150.00
	TBN Phone call from client from california	0.50 \$650.00/hr	\$325.00
	TBN Finalize motion and order for extension after defendant's ok (.8)/ call court to inform them (.1)	0.90 \$650.00/hr	\$585.00
2/26/2021	JSG Call from consumer re: leaf filter litigation.	0.40 \$700.00/hr	\$280.00
	CP Phone call with consumer Dering (.2). Followup email to TBN, JSG, SV (.1). Updated lead chart (.2).	0.50 \$150.00/hr	\$75.00
	JSG Reviewed and responded to email from California leaf filter consumer. Forwarded same to team.	0.30 \$700.00/hr	\$210.00
3/11/2021	SAV Telephone conference with former Leaf Filter employee.	0.30 \$175.00/hr	\$52.50
	SAV Email to JSG and CP re LF former employee.	0.10 \$175.00/hr	\$17.50

			<u>Hrs/Rate</u>	<u>Amount</u>
3/15/2021	TBN	work on identifying appropriate class reps from our list of intakes	1.50 \$650.00/hr	\$975.00
	CP	Updated lead chart (.2); reviewed chart for potential class reps for amended complaint (.5); phone call with new lead, Kiest (.2); email to Bonifield (.1).	1.00 \$150.00/hr	\$150.00
	SAV	Emails from/to TBN/CP re class rep selection.	0.10 \$175.00/hr	\$17.50
3/16/2021	CP	Emails to/from Armstrong (.1); emails to/from T Naylor (.1); updated lead chart (.2).	0.40 \$150.00/hr	\$60.00
3/17/2021	JSG	Call from LeafFilter customer in Colorado inquiring about the litigation (0.2). Email to team requesting follow up interview (0.2).	0.40 \$700.00/hr	\$280.00
	CP	Phone call with new lead, Vogel (.3); updated lead chart (.2); emailed JSG, TBN, SV re N. Vogel details (.1); converted provided docs to PDF and saved in WD (.6).	1.20 \$150.00/hr	\$180.00
3/18/2021	TBN	follow ups on class reps	1.20 \$650.00/hr	\$780.00
3/19/2021	CP	Emails to/from Armstrong re his document transmittal (.2); saved his texts & emails (.3).	0.50 \$150.00/hr	\$75.00
3/22/2021	JSG	Conference with R. Sherwood and T. Naylor re: status of adding additional plaintiffs to the Leaf Filter Amended Complaint due April 1st.	0.40 \$700.00/hr	\$280.00
	CP	Saved Armstrong docs, photos, and videos to WD (.9); emailed to JSG, TBN, SV (.1).	1.00 \$150.00/hr	\$150.00
	TBN	Meeting with jeff and bob to discuss status of complaint	0.40 \$650.00/hr	\$260.00

			<u>Hrs/Rate</u>	<u>Amount</u>
3/22/2021	RBS	Conference with T. Naylor and J. Goldenberg re need to contact new potential class reps in anticipation for deadline to file amended complaint.	0.40 \$600.00/hr	\$240.00
3/23/2021	JSG	Call with co-counsel re: potential new plaintiffs and amended complaint strategy.	0.50 \$700.00/hr	\$350.00
3/24/2021	SAV	Emails from to JSG and CP re contacting lead.and Emails to/from lead (.1). Emails to/from JSG and TBN re R&R (.1).	0.20 \$175.00/hr	\$35.00
	SAV	Phone conferences with lead.	0.40 \$175.00/hr	\$70.00
	SAV	Updated contact list with lead's info/facts.	0.40 \$175.00/hr	\$70.00
	JSG	Reviewed information about potential NJ class rep (0.2); emails to and from team re: same (0.2).	0.40 \$700.00/hr	\$280.00
3/25/2021	JSG	Email to S. Vaaler re: potential NJ plaintiff.	0.20 \$700.00/hr	\$140.00
	JSG	Reviewed Complaint (0.6); reviewed docs from W. Va. plaintiff (0.2).	0.80 \$700.00/hr	\$560.00
	SAV	Email from/to JSG re R&R and reviewed R&R and edited same (.1). Prepared Adobe Sign for class rep signature (.1). Email to class rep re R&R and Email from JSG re ph. conf with class rep (.1). Email to class rep re same (.1).	0.40 \$175.00/hr	\$70.00
	JSG	Emails to and from S. Vaaler re: retainer status for NJ Plaintiff.	0.20 \$700.00/hr	\$140.00

			<u>Hrs/Rate</u>	<u>Amount</u>
3/26/2021	SAV	Emails from/to potential NJ class rep re class representation questions/answers. Email to JSG re same (.1). Email from/to class rep re r&r (.1).	0.20 \$175.00/hr	\$35.00
	TBN	work on confirming details of MD rep for amended complaint	0.50 \$650.00/hr	\$325.00
	RBS	Research whether New Jersey or Maryland consumer protection statutes have presuit notice requirements (.6); emails with J. Goldenberg re same (.1).	0.70 \$600.00/hr	\$420.00
	JSG	Reviewed retainer from NJ plaintiff; forwarded same to team.	0.20 \$700.00/hr	\$140.00
3/29/2021	JSG	Discussed amended complaint strategy with Todd and Bob (0.5). Reviewed pre-suit notice memo (0.8). Call with NJ plaintiff (0.3); email to team re: NJ plaintiff facts (0.3). Call with Pennsylvania plaintiffs (0.3); call with Washington plaintiffs (0.3); drafted NJ plaintiff fact paragraph (1.0); conference with R. Sherwood re: facts for Pennsylvania and Washington plaintiffs (0.4).	3.90 \$700.00/hr	\$2,730.00
	SAV	Emails from/to JSG re retainers needed for class reps' signatures (.1). Emails to class reps re need for spouses' email addresses (.2). Email to JSG re same (.2). Email to NJ rep re status of retainer and Email to JSG re same (.2). Email from/to JSG re phone conf with class rep. (.1)	0.80 \$175.00/hr	\$140.00
	RBS	Edits to draft amended complaint to add new plaintiffs and new state law counts (3.0); research state consumer protection statutes as necessary (.7); research pre-suit notice requirements for each state (.7); confer with J. Goldenberg re same (.1).	4.50 \$600.00/hr	\$2,700.00

		<u>Hrs/Rate</u>	<u>Amount</u>
3/29/2021	TBN work on ameded complaint and reps	0.40 \$650.00/hr	\$260.00
	SAV Filed signed retainer in WD	0.10 \$175.00/hr	\$17.50
	SAV Prepared retainers for class reps' signatures in Adobe Sign and Edited same.	1.00 \$175.00/hr	\$175.00
3/30/2021	JSG Reviewed and Edited Amended Complaint (2.3); emailed same to team (0.1); emailed same to plaintiffs (0.3).	2.70 \$700.00/hr	\$1,890.00
	CP Revisions to Amended Complaint (.6); emails to Varnell & Warwick firm to request James & Geraldine Zilinsky's email address (.1); updated lead chart with Zilinsky and Simpson contact information (.2).	0.90 \$150.00/hr	\$135.00
	SAV Emails from/to class rep re name discrepancy (.1). Emails to/from CP/JSG re same (.1). Efiled R&R and client docs in WD (.1).	0.30 \$175.00/hr	\$52.50
3/31/2021	SAV File Review for status of MD retainer.	0.10 \$175.00/hr	\$17.50
	TBN amended complaint/ give my sign off and reveiw potential issues	1.20 \$650.00/hr	\$780.00
	RBS Review proposed edits from B. Warwick (.3); confer with T. Naylor and J. Goldenberg re same (.2). Emails to group re same (.1).	0.60 \$600.00/hr	\$360.00
	SAV Email to/from CP re MD class rep. and Email to JSG re same.	0.10 \$175.00/hr	\$17.50
4/1/2021	CP Per JSG, reviewed, finalized, and filed the Amended Complaint.	0.50 \$150.00/hr	\$75.00

			<u>Hrs/Rate</u>	<u>Amount</u>
4/1/2021	RBS	Finalize draft amended complaint by changing damage allegations (2.8); emails re same (.2); prepare same for filing (.5)	3.50 \$600.00/hr	\$2,100.00
4/5/2021	TBN	strategy re: 26f	0.20 \$650.00/hr	\$130.00
4/6/2021	JSG	Reviewed proposed 26(f) report (0.2). Emails to and from T. Naylor re:same (0.1).	0.30 \$700.00/hr	\$210.00
	TBN	Prepare for and attend conference with defendant re: 26f report (.5)/ follow ups after (.5)/ calls with potential class members (1.7)	2.70 \$650.00/hr	\$1,755.00
4/7/2021	JSG	Reviewed 26(f) report (0.3); email to team re: comments about the same (0.1).	0.40 \$700.00/hr	\$280.00
4/8/2021	TBN	edits to 26f report (.5) / emails to brian (.2)	0.70 \$650.00/hr	\$455.00
4/9/2021	JSG	Attended 26(f) conference call	0.40 \$700.00/hr	\$280.00
4/13/2021	JSG	Prepared for and attended CMC with Magistrate Jolson.	0.50 \$700.00/hr	\$350.00
	CP	Phone call to Jessica Rector in Magistrate Jolson's chambers re: call-in number for PT Conference (.1); email to J. Goldenberg and T. Naylor re: same (.1); email to C. Koerner at Varnell firm w/call-in number (.1).	0.30 \$150.00/hr	\$45.00
	TBN	prepare for and attend 26f call with court	0.50 \$650.00/hr	\$325.00
	RBS	Emails with T. Naylor re fraud claim in most recent complaint (.1); research emails re same (.1).	0.20 \$600.00/hr	\$120.00

		<u>Hrs/Rate</u>	<u>Amount</u>
4/13/2021	JSG Reviewed emails from C. Pence re: call instructions for CMC (0.1); follow up with T. Naylor re: same (0.1). Email from defense counsel re: defendant's request for an extension to respond to Amended Complaint (0.2).	0.40 \$700.00/hr	\$280.00
4/14/2021	JSG Reviewed scheduling ecf from court. Entered 26(f) report date.	0.20 \$700.00/hr	\$140.00
4/20/2021	CP Phone call with Emily Turner re their LeafFilter issues (.2); updated master contact list with her info (.1), and emailed Jeff, Todd and Stephanie (.1).	0.40 \$150.00/hr	\$60.00
4/21/2021	CP Phone call and email to former employee re obtaining his training video from LF and setting up phone conference with attorneys.	0.20 \$150.00/hr	\$30.00
4/23/2021	CP Updated master contact list.	0.20 \$150.00/hr	\$30.00
4/28/2021	CP Phone call with Purchas re her LF issues (.2); emails to/from Blanda re LF issues (.1); added both new leads to contact list (.2); saved Blanda docs to Wordox (.1); emailed details to JSG, TBN, and SV (.1).	0.70 \$150.00/hr	\$105.00
4/29/2021	RBS Review defendant's MTD in preparation for drafting opposition.	0.50 \$600.00/hr	\$300.00
5/3/2021	CP Phone call with Davisson re his issues with LF (.2); updated chart (.2); email to Jeff, Todd and Stephanie with info (.1).	0.50 \$150.00/hr	\$75.00
	RBS Review and analyze Def.'s motion to dismiss (.7); email proposed assignments of sections(.3).	1.00 \$600.00/hr	\$600.00

			<u>Hrs/Rate</u>	<u>Amount</u>
5/3/2021	JSG	Call from LF Purchaser in NC. (0.3). Reviewed email from another purchaser in NJ.- forwarded to S. Vaaler for interview (0.3).	0.60 \$700.00/hr	\$420.00
5/4/2021	RBS	Begin researching Ohio and national choice of law authorities involving statutory claims with contractual choice of law provisions (5.0); analyze same(.5)..	5.50 \$600.00/hr	\$3,300.00
	CP	Phone call with Garvey re his issues with LeafFilter (.2); updated chart (.1); email to Jeff, Todd and Stephanie with info re Garvey (.1).	0.40 \$150.00/hr	\$60.00
5/5/2021	RBS	Continue researching cases interpreting whether CSPA can apply extraterritorially (4.0); Research Ohio Product Liability Act scope and preemption issues in preparation for drafting MTD opp (4.0).	8.00 \$600.00/hr	\$4,800.00
5/6/2021	RBS	Finish researching authorities in preparation for drafting MTD Opp (3.5). Begin creating brief outline re same (.5).	4.00 \$600.00/hr	\$2,400.00
5/7/2021	JSG	Call from consumer Brinkley - NC.	0.90 \$700.00/hr	\$630.00
	TBN	draft initial disclosures and send to team for review (1.6)/ review their disclosures (.4)	2.00 \$650.00/hr	\$1,300.00
	RBS	Begin drafting memorandum in opposition to motion to dismiss (3.5); conduct additional research as necessary (.5),	4.00 \$600.00/hr	\$2,400.00
5/10/2021	CP	Phone call and emails to/from Bayha in Colorado re: his LF issues (.2); updated chart (.1); email to JSG, TBN, and SV with details (.1).	0.40 \$150.00/hr	\$60.00

			<u>Hrs/Rate</u>	<u>Amount</u>
5/10/2021	RBS	Continue drafting memorandum in opposition to motion to dismiss (7.0); conduct additional research as necessary (1.0),	8.00 \$600.00/hr	\$4,800.00
	TBN	strategy discussion re: defendant violating page limits (.6)/ draft email re: violation of page limits in MTD (.3)	0.90 \$650.00/hr	\$585.00
5/11/2021	JSG	Reviewed emails from dissatisfied customers (0.2). Email to team re: potentially obtaining declarations from dissatisfied customers (0.2).	0.40 \$700.00/hr	\$280.00
	RBS	Continue drafting memorandum in opposition to motion to dismiss (6.0); conduct additional research as necessary, (1.0)	7.00 \$600.00/hr	\$4,200.00
5/12/2021	RBS	Continue drafting memorandum in opposition to motion to dismiss (5.5); conduct additional research as necessary (.5),	6.00 \$600.00/hr	\$3,600.00
	CP	Phone call with Chamberlain re: her problems with LF (.1); updated chart (.1); email to JSG, TBN, and SV with details (.1).	0.30 \$150.00/hr	\$45.00
5/13/2021	RBS	Continue drafting memorandum in opposition to motion to dismiss (6.0); conduct additional research as necessary (1.0),	7.00 \$600.00/hr	\$4,200.00
	RBS	Incorporate V&W's section of MTD Opp brief into main brief (.2); research potential economic loss rule exceptions (.7); emails re same (.1).	1.00 \$600.00/hr	\$600.00
	JSG	Reviewed email from LF customer re: overflow issues; LF non-responsive.	0.20 \$700.00/hr	\$140.00
5/14/2021	CP	Phone call with Ladd re: her LF issues.	0.20 \$150.00/hr	\$30.00

			<u>Hrs/Rate</u>	<u>Amount</u>
5/14/2021	RBS	Continue edits to MTD Opp brief (1.0); conduct additional research as necessary (1.0).	2.00 \$600.00/hr	\$1,200.00
5/17/2021	CP	Finalized and filed Motion to Extend Time and Pages (.2); emailed proposed order to the judge (.1).	0.30 \$150.00/hr	\$45.00
	RBS	Telephone conference call with co-counsel re briefing strategy (.7); continue edits to MTD Opp brief (6.0); conduct additional research as necessary (.8).	7.50 \$600.00/hr	\$4,500.00
	TBN	Telephone conference with team re: MTD strategy (.6)/ prep for call (.4)	1.00 \$650.00/hr	\$650.00
5/18/2021	RBS	Continue edits to MTD Opp brief (6.0); conduct additional research as necessary (1.0).	7.00 \$600.00/hr	\$4,200.00
5/20/2021	CP	Phone calls with potential class reps/members to get their details of LF problems.	0.30 \$150.00/hr	\$45.00
	RBS	Finish edits to MTD Opp brief (2.3); distribute same to co-counsel for review and edits (.2).	2.50 \$600.00/hr	\$1,500.00
5/21/2021	CP	Updated lead chart.	0.20 \$150.00/hr	\$30.00
5/24/2021	JSG	Reviewed LF's website (videos of rain water flowing and debris blowing).	0.50 \$700.00/hr	\$350.00
	RBS	Review T. Naylor's proposed edits to MTD Opp brief (1.0); incorporate same into brief (.2); distribute same to co-counsel for review and edits (.1); review proposed edits from V&W (1.2).	2.50 \$600.00/hr	\$1,500.00
5/25/2021	SAV	Telephone conference with intake.	0.10 \$175.00/hr	\$17.50

			<u>Hrs/Rate</u>	<u>Amount</u>
5/25/2021	RBS	Incorporate V&W edits into brief (2.7); emails re same (.2); distribute same for review (.1).	3.00 \$600.00/hr	\$1,800.00
	SAV	Email to TBN re: contact with potential class member	0.10 \$175.00/hr	\$17.50
	SAV	Updated contact list.	0.10 \$175.00/hr	\$17.50
5/26/2021	JSG	Reviewed and edited brief.	3.50 \$700.00/hr	\$2,450.00
	RBS	Confer with J. Goldenberg re additional edits to brief.	0.50 \$600.00/hr	\$300.00
5/27/2021	RBS	Incorporate J. Godenberg's edits into final draft (1.0); finalize exhibits (.2); email same to C. Pence re filing (.1); emails re proposed redactions to exhibits (.2).	1.50 \$600.00/hr	\$900.00
6/2/2021	CP	Phone calls with potential reps/class members, R Jones, Crawford, and Leffingwell.	0.90 \$150.00/hr	\$135.00
	TBN	review updates to chart showing new contacts (1.2), research based on common complaints re: mesh hole size (.8)	2.00 \$650.00/hr	\$1,300.00
6/4/2021	CP	Phone call with Ford re his LF purchase/issues (.2); updated chart (.1); email to JSG, TBN, SV with details (.1).	0.40 \$150.00/hr	\$60.00
6/7/2021	CP	Phone call with Hellman re his LF purchase/issues (.4); follow-up email to Mr. Hellman; added info to chart (.1).	0.50 \$150.00/hr	\$75.00

			<u>Hrs/Rate</u>	<u>Amount</u>
6/8/2021	SAV	Email from/to JSG re Leaf Filter contact and Email to contact re request for phone number/ph. conf (.1). Email to contact re appointment for phone conference (.1).	0.20 \$175.00/hr	\$35.00
6/9/2021	SAV	Telephone conferences with contacts.	0.40 \$175.00/hr	\$70.00
	JSG	Reviewed email from potential class member (0.1). Forwarded same to S. Vaaler and C. Pence for follow up (0.1).	0.20 \$700.00/hr	\$140.00
	SAV	Emails to JSG, CP, TBN re ph confs.	0.10 \$175.00/hr	\$17.50
	SAV	updated contact list	0.10 \$175.00/hr	\$17.50
6/10/2021	SAV	Telephone conference with contact.	0.20 \$175.00/hr	\$35.00
	SAV	Email to JSG/CP/TBN re ph. confs.	0.10 \$175.00/hr	\$17.50
	SAV	Updated contact chart.	0.10 \$175.00/hr	\$17.50
6/14/2021	TBN	review new contacts	0.50 \$650.00/hr	\$325.00
6/21/2021	SAV	Reviewed email from lead (former employee).	0.20 \$175.00/hr	\$35.00
	SAV	Created link between former contractor list to commission sales sheet.	0.70 \$175.00/hr	\$122.50
	SAV	Email to JSG/CP re lead and Email from lead.	0.10 \$175.00/hr	\$17.50

		<u>Hrs/Rate</u>	<u>Amount</u>
6/21/2021	SAV Research re lead.	0.10 \$175.00/hr	\$17.50
6/23/2021	CP Phone calls with potential class members, Poretto and Brigham (.4); updated master chart (.1); sent follow up emails to Sal P. and Ed. B.; (.1) emails to JSG, TBN, and SV with info from phone calls (.1).	0.70 \$150.00/hr	\$105.00
	SAV Telephone conference with lead.	0.20 \$175.00/hr	\$35.00
	TBN review emails from former employees and customers (.6), send email with strategy options (.3)	0.90 \$650.00/hr	\$585.00
	SAV Updated contact list.	0.10 \$175.00/hr	\$17.50
6/28/2021	CP Email and phone call to potential class member, Poretto, re JSG follow-up questions.	0.20 \$150.00/hr	\$30.00
	SAV Emails to contacts.	0.10 \$175.00/hr	\$17.50
	SAV Updated LF Contact List.	0.20 \$175.00/hr	\$35.00
6/29/2021	CP Phone call with potential class member, Belferman. (.2) Email to JSG, TBN, & SV re details (.1); updated contact list (.1); phone call and email to Rallings re: his email to GS (.1).	0.50 \$150.00/hr	\$75.00
	SAV Telephone call to lead and Email to lead.	0.10 \$175.00/hr	\$17.50
6/30/2021	SAV Telephone conference with contact.	0.40 \$175.00/hr	\$70.00

			<u>Hrs/Rate</u>	<u>Amount</u>
6/30/2021	SAV	Email to TBN and JSG re lead and Email to lead.	0.10 \$175.00/hr	\$17.50
	SAV	Updated LF Contact List.	0.40 \$175.00/hr	\$70.00
7/2/2021	CP	Email to/from Neese re obtaining his address (.1); phone call with Senner re: her LF system issues (.2); updated contact list (.2).	0.50 \$150.00/hr	\$75.00
7/6/2021	JSG	Conference with T. Naylor and R. Sherwood re: summary of conversation with former LF employee.	0.30 \$700.00/hr	\$210.00
7/8/2021	TBN	Telephone conference with potential plaintiffs	1.00 \$650.00/hr	\$650.00
7/12/2021	CP	Phone calls with leads who called/emailed GS (.2); updated contact list (.1); email to JSG, TBN, SV (.1).	0.40 \$150.00/hr	\$60.00
7/14/2021	CP	Call with Z King re her LF problems (.2); email to JSG, TBN, SV (.1); updated contact chart (.1).	0.40 \$150.00/hr	\$60.00
7/15/2021	SAV	Telephone conference with contact.	0.30 \$175.00/hr	\$52.50
	SAV	Updated LF Contact List.	0.10 \$175.00/hr	\$17.50
	SAV	Reviewed news re LF director.	0.10 \$175.00/hr	\$17.50
7/19/2021	CP	Phone calls with new leads (.2); updates to chart (.2).	0.40 \$150.00/hr	\$60.00
	TBN	review draft discovery from co-counsel and work on suggested edits	0.50 \$650.00/hr	\$325.00

		<u>Hrs/Rate</u>	<u>Amount</u>
7/20/2021	TBN work on edits to draft discovery	1.40 \$650.00/hr	\$910.00
7/21/2021	CP Phone call with lead, Holt. (.2) Updated master chart (.2); email to JSG, TBN and SV with T. Holt info (.1).	0.50 \$150.00/hr	\$75.00
	SAV Email to contact.	0.10 \$175.00/hr	\$17.50
	SAV updated chart with contact info.	0.10 \$175.00/hr	\$17.50
7/23/2021	TBN edits to doc requests and send back to co-counsel with comments	1.50 \$650.00/hr	\$975.00
7/26/2021	CP Call with S Taylor re her LF problems (.2); emails to/from Cox re his continued interactions with LF (.2); emails to JSG, TBN, and SV re new lead info and updates (.1); updated contact list (.2).	0.70 \$150.00/hr	\$105.00
	SAV Telephone conference with contact.	0.40 \$175.00/hr	\$70.00
	SAV Email to contact with request for update.	0.10 \$175.00/hr	\$17.50
	SAV Updated chart re ph.conf.	0.40 \$175.00/hr	\$70.00
7/27/2021	CP Phone call with Gendraw to go over her LF issues and get contact info (.2); emails to JSG, TBN, and SV with M. Gendraw info and an update from S. Taylor re her service call with LF (.1); updated master contact list (.2).	0.50 \$150.00/hr	\$75.00

			<u>Hrs/Rate</u>	<u>Amount</u>
7/27/2021	TBN	edits to/ suggestions for roggs and admissions	1.70 \$650.00/hr	\$1,105.00
7/28/2021	CP	Updated chart to add info available for people who inquired via email/website but haven't responded to GS calls or emails.	0.50 \$150.00/hr	\$75.00
7/29/2021	CP	Phone call with Zgavec re her LF issues (.1); emails from/to Poretto re his settlement with LF (.1); updated master chart (.1); email to JSG, TBN, and SV (.1).	0.40 \$150.00/hr	\$60.00
	TBN	respond to class member inquiry	0.50 \$650.00/hr	\$325.00
7/30/2021	CP	Phone calls with Vollmar and Lenz re LF complaints (.3); updated chart (.1); emails to JSG, TBN, SV (.1).	0.50 \$150.00/hr	\$75.00
8/3/2021	SAV	Telephone conferences with LeafFilter contacts(.2). Updated contact list (.1).	0.30 \$175.00/hr	\$52.50
	SAV	Emails from/to JM and CP re reg. agent.	0.10 \$175.00/hr	\$17.50
	SAV	Phone conf with contact re reg agent	0.10 \$175.00/hr	\$17.50
	SAV	SOS search for registered agent in TN for LF.	0.10 \$175.00/hr	\$17.50
8/4/2021	JSG	Reviewed email from C. Pence re: LF consumer.	0.30 \$700.00/hr	\$210.00
	CP	Phone call with Ruder re: LeafFilter issues (.1); updated chart (.1); email to JSG, TBN, SV (.1); follow-up email to D. Ruder (.1).	0.40 \$150.00/hr	\$60.00

		<u>Hrs/Rate</u>	<u>Amount</u>
8/9/2021	CP Phone call with Jan Fedie re his LF issues (.1); updated chart (.1); email to JSG, TBN, SV (.1).	0.30 \$150.00/hr	\$45.00
8/10/2021	SAV Email from/to contact.	0.10 \$175.00/hr	\$17.50
	JSG Reviewed fact summary re: LF consumer in Pennsylvania.	0.20 \$700.00/hr	\$140.00
	JSG Email to team re: status of service of discovery.	0.20 \$700.00/hr	\$140.00
	SAV Updated contact list with info contact left in vm.	0.10 \$175.00/hr	\$17.50
8/12/2021	CP Phone call with Conley re her LF issues (.1); updated chart (.1); email to JSG, TBN, SV (.1).	0.30 \$150.00/hr	\$45.00
8/13/2021	CP Phone call with Stoebig re his LF contract (he canceled within 3 day period).	0.30 \$150.00/hr	\$45.00
8/18/2021	CP Phone call with Boudreau re her LeafFilter issues (.2); updated chart (.1); sent email to JSG, TBN, SV (.1).	0.40 \$150.00/hr	\$60.00
8/23/2021	SAV Email from JSG re LF contact, email sent to contact requesting additional information and email to GS team re same.	0.10 \$175.00/hr	\$17.50
8/25/2021	CP Updated contact list with new info from Taytlor (.2); email to new lead Mugele (.1).	0.30 \$150.00/hr	\$45.00
	SAV Emails from/to lead.	0.10 \$175.00/hr	\$17.50
8/26/2021	JSG Reviewed email from LF consumer.	0.40 \$700.00/hr	\$280.00

			<u>Hrs/Rate</u>	<u>Amount</u>
8/30/2021	CP	Phone calls with new leads, Blevins and Dub; (.6) updated chart (.4).	1.00 \$150.00/hr	\$150.00
	SAV	Email from/ to contact.	0.10 \$175.00/hr	\$17.50
	SAV	Updated contact list.	0.10 \$175.00/hr	\$17.50
9/2/2021	JSG	Reviewed email from LF consumer.	0.20 \$700.00/hr	\$140.00
	JSG	Reviewed LF consumer summary.	0.20 \$700.00/hr	\$140.00
9/7/2021	CP	Phone call with Lorenzo re LF issues (.2); emails to new leads (.1); updated chart (.1); email to JSG, TBN, and SV with H Lorenzo info (.1).	0.50 \$150.00/hr	\$75.00
9/13/2021	TBN	follow up with brian re: status of discovery	0.40 \$650.00/hr	\$260.00
9/15/2021	CP	Phone call with new lead; (.2) updated chart (.1); email to JSG, TBN, and SV with info (.1).	0.40 \$150.00/hr	\$60.00
9/17/2021	CP	Phone calls with new leads (.2); updated chart (.1); emails to JSG, TBN, SV (.1).	0.40 \$150.00/hr	\$60.00
9/20/2021	CP	Phone call with Larson re his LF issues (.2); emails to new leads (.1); updated chart (.1); email to JSG, TBN, SV re Larson (.1).	0.50 \$150.00/hr	\$75.00
	JSG	Conference with T. Naylor and R. Sherwood re: status of discovery responses from LF.	0.20 \$700.00/hr	\$140.00
9/21/2021	JSG	Reviewed information about potential expert (0.4). Emails to and from team re: same (0.3).	0.70 \$700.00/hr	\$490.00

		<u>Hrs/Rate</u>	<u>Amount</u>
9/27/2021	TBN review intake call summaries	0.70 \$650.00/hr	\$455.00
	SAV Telephone conferences with potential class members	0.20 \$175.00/hr	\$35.00
	JSG Reviewed emails summarizing class member information and experiences with LF. (0.4). Emails to team re: follow up information needed (0.1).	0.60 \$700.00/hr	\$420.00
	SAV Emails to/from JSG/TBN re ph. confs with contacts.	0.20 \$175.00/hr	\$35.00
	SAV Updated chart.	0.20 \$175.00/hr	\$35.00
9/28/2021	TBN review discovery responses (.9)/ follow up with brian (.3)	1.20 \$650.00/hr	\$780.00
	SAV Telephone conferences with intake.	0.20 \$175.00/hr	\$35.00
	SAV Updated contact list.	0.10 \$175.00/hr	\$17.50
10/1/2021	TBN review draft protective order and work on redline	0.90 \$650.00/hr	\$585.00
10/4/2021	TBN finalize redline of protective order and send to defense counsel	1.20 \$650.00/hr	\$780.00
	SAV Telephone conference with contact.	0.20 \$175.00/hr	\$35.00
	JSG Reviewed emails re: protective order edits.	0.20 \$700.00/hr	\$140.00

			<u>Hrs/Rate</u>	<u>Amount</u>
10/4/2021	SAV	Updated chart.	0.10 \$175.00/hr	\$17.50
10/5/2021	SAV	Phone call from intake.	0.20 \$175.00/hr	\$35.00
	JSG	Reviewed emails from disgruntled LF consumers; responded as appropriate.	0.40 \$700.00/hr	\$280.00
	SAV	Updated chart.	0.10 \$175.00/hr	\$17.50
10/6/2021	JSG	attended call with potential expert.	0.60 \$700.00/hr	\$420.00
	TBN	Telephone conference with potential expert	0.60 \$650.00/hr	\$390.00
	SAV	Updated chart.	0.10 \$175.00/hr	\$17.50
	SAV	Phone call from intake.	0.20 \$175.00/hr	\$35.00
10/7/2021	SAV	Phone calls from intakes.	0.60 \$175.00/hr	\$105.00
	SAV	Updated contact list.	0.40 \$175.00/hr	\$70.00
10/8/2021	SAV	Updated chart with contact information	0.10 \$175.00/hr	\$17.50
10/11/2021	TBN	emails re: protective order and set up M&C re: same	0.20 \$650.00/hr	\$130.00
	SAV	Telephone conference with contact. .	0.10 \$175.00/hr	\$17.50

			<u>Hrs/Rate</u>	<u>Amount</u>
10/11/2021	JSG	Reviewed emails re: edits to protective order.	0.30 \$700.00/hr	\$210.00
	SAV	Email to JSG re website LF updates	0.10 \$175.00/hr	\$17.50
	SAV	Updated contact list.	0.10 \$175.00/hr	\$17.50
10/12/2021	CP	Emails from/to Larson with an update re: his system; (.1) updated lead chart (.2); emails to LF customers who inquired via GS website re: setting up a call (.1).	0.40 \$150.00/hr	\$60.00
	TBN	prep for M&C call (.5)/ hold call (.5)/ send draft protective order with the changes we discussed to defense counsel (.5)	1.50 \$650.00/hr	\$975.00
10/13/2021	TBN	finalize protective order based upon defendant's comment (.3)/ review their draft motion re: same and approve (.2)	0.50 \$650.00/hr	\$325.00
	SAV	Telephone conference with contact.	0.30 \$175.00/hr	\$52.50
	SAV	Emails from/to contacts (.2). Updated contact list (.2).	0.40 \$175.00/hr	\$70.00
	SAV	Updated contact sheet.	0.10 \$175.00/hr	\$17.50
10/14/2021	TBN	review discovery deficiency letter and send comments	0.40 \$650.00/hr	\$260.00
10/19/2021	JSG	Reviewed email to defense counsel re: meet and confer on discovery.	0.20 \$700.00/hr	\$140.00

			<u>Hrs/Rate</u>	<u>Amount</u>
10/19/2021	JSG	Reviewed LF's initial disclosures (0.2); follow up with T. Naylor re: we should request LF counsel to update initial disclosures to see if any insurance policies have been identified (0.2).	0.40 \$700.00/hr	\$280.00
	CP	Emails to LF customers in response to their GS website inquiries.	0.20 \$150.00/hr	\$30.00
10/20/2021	CP	Emails from/to Lorenzo re her LF issues (.2); email to JSG, TBN, SV re: H Lorenzo details (.1); updated lead chart (.4).	0.70 \$150.00/hr	\$105.00
10/22/2021	CP	Emails to leads (.2); phone interviews with leads (.3); emailed JSG, TBN, SV and updated the chart (.3); email from/to Cirillo re her update request (.2);	1.00 \$150.00/hr	\$150.00
10/27/2021	CP	Updated lead chart with new caller info.	0.50 \$150.00/hr	\$75.00
11/2/2021	TBN	review and approve revised list of topics for defendant to search	0.20 \$650.00/hr	\$130.00
11/3/2021	CP	Email from/to Dodd re follow-up to our previous call.	0.20 \$150.00/hr	\$30.00
11/15/2021	JSG	Conference with team to discuss discovery status and scheduling.	0.30 \$700.00/hr	\$210.00
11/18/2021	JSG	Attended discovery meet and confer with defense counsel.	0.30 \$700.00/hr	\$210.00
11/19/2021	CP	Phone calls with leads (.4); updated chart (.3).	0.70 \$150.00/hr	\$105.00
11/29/2021	TBN	review court order granting 3 months extension (.1)/ send thoughts on strategy (.2)	0.30 \$650.00/hr	\$195.00

			<u>Hrs/Rate</u>	<u>Amount</u>
12/3/2021	CP	Phone calls with leads re their LF system details (.2); updated chart (.2).	0.40 \$150.00/hr	\$60.00
	TBN	draft 30b6 notice (3.8)/ edit based on comments from team (.5)/ serve on defendant (.1)	4.40 \$650.00/hr	\$2,860.00
	RBS	Edits to draft 30(b)(6) deposition notice (.4); confer with T. Naylor re same (.1)	0.50 \$600.00/hr	\$300.00
12/7/2021	SAV	Telephone conference with potential class member.	0.20 \$175.00/hr	\$35.00
	SAV	Updated chart.	0.10 \$175.00/hr	\$17.50
	SAV	Reviewed Reference Solutions for Leaf Filter North contacts.	0.40 \$175.00/hr	\$70.00
12/8/2021	TBN	Research potential experts (.6); talk with class member (.3)	0.90 \$650.00/hr	\$585.00
12/9/2021	TBN	Telephone conference with potential expert (.6)/ prep for cal (.3)	0.90 \$650.00/hr	\$585.00
12/14/2021	CP	Email to potential class member Christina Rassizi as a follow-up to our prior phone call.	0.20 \$150.00/hr	\$30.00
	JSG	Reviewed email from defense counsel re: document production status.	0.10 \$700.00/hr	\$70.00
12/17/2021	TBN	Telephone conference with team re: plan for next few months (1.2)/ prep for call (.3)	1.50 \$650.00/hr	\$975.00
	JSG	Conference with team re: experts and upcoming discovery.	1.20 \$700.00/hr	\$840.00

			<u>Hrs/Rate</u>	<u>Amount</u>
12/20/2021	TBN	review modification to protective order proposed by defendant (not in redline) and send my thoughts to co-counsel on whether we should agree	0.70 \$650.00/hr	\$455.00
	JSG	Reviewed protective order provision about contacting LF customers identified in LF's documents.	0.20 \$700.00/hr	\$140.00
	JSG	emails to and from C. Pence re: summarizing LF consumer's experience in Texas.	0.40 \$700.00/hr	\$280.00
12/21/2021	TBN	Telephone conference with opposing counsel re: need to expedite depositions and discovery (.4)/ prep for call (.4)	0.80 \$650.00/hr	\$520.00
12/22/2021	SAV	Email from JSG re lead (.1). Email to/from lead (.1). Telephone conference with lead (.1). Updated chart (.1).	0.40 \$175.00/hr	\$70.00
12/28/2021	JSG	Reviewed emails from defense counsel re: discovery status update.	0.40 \$700.00/hr	\$280.00
	TBN	review correspondence re: deposition scheduling and follow up with co-counsel	0.20 \$650.00/hr	\$130.00
12/29/2021	JSG	Reviewed marketing documents provided by class member (0.7). Provided same to T. Naylor (0.1).	0.80 \$700.00/hr	\$560.00
1/3/2022	TBN	Telephone conferences with class members (.8); review hot doc (.4); research (.7)	1.90 \$650.00/hr	\$1,235.00
1/4/2022	SAV	Email from potential class member.	0.10 \$175.00/hr	\$17.50
	TBN	review notes from call with defendant re: 30b6 (.3)/ follow up with email (.1)	0.40 \$650.00/hr	\$260.00

		<u>Hrs/Rate</u>	<u>Amount</u>
1/5/2022	CP Spoke to LF customers inquiring about the case, or providing updates re: their LF service calls (.3); emails to JSG, TBN, SV; (.1) updated master chart (.1).	0.50 \$150.00/hr	\$75.00
	SAV Telephone conference with potential class member.	0.20 \$175.00/hr	\$35.00
	TBN review docs (1) call with co-counsel (.4)	1.40 \$650.00/hr	\$910.00
	SAV Emails from/to LF contacts.	0.10 \$175.00/hr	\$17.50
	SAV Updated chart.	0.10 \$175.00/hr	\$17.50
	SAV Reviewed Pacer for case status.	0.20 \$175.00/hr	\$35.00
1/6/2022	SAV Updated chart.	0.10 \$175.00/hr	\$17.50
	SAV File Review: Amended Complaint, Adobe Sign, Class Rep file.	0.40 \$175.00/hr	\$70.00
	JSG Conference with T. Naylor re: experts..	0.30 \$700.00/hr	\$210.00
	TBN edits to letter to clients re: discovery (.3); review docs (.6)	0.90 \$650.00/hr	\$585.00
	SAV Email to TBN re GS' class reps.Email from/to contact.	0.10 \$175.00/hr	\$17.50
1/7/2022	JSG Conference with T. Naylor re: prepped for conference with team (0.2).Conference with team re: class cert strategy (0.7).	0.90 \$700.00/hr	\$630.00

			<u>Hrs/Rate</u>	<u>Amount</u>
1/7/2022	JSG	Emails to and from Gaskin's group re: potential conjoint; forwarded copy of operative complaint.	0.40 \$700.00/hr	\$280.00
	JSG	Call with S. Gaskin's administrator re: potential conjoint report.	0.40 \$700.00/hr	\$280.00
	TBN	Telephone conference with team re: case strategy (.5)/ prep for call (.2)	0.70 \$650.00/hr	\$455.00
1/10/2022	CP	Emails from/to potential class members who have emailed with updates on their interactions with LF (.2). Updated master chart (.2).	0.40 \$150.00/hr	\$60.00
1/11/2022	JSG	Call with Colin Weir and Steve Gaskin and Patty re: potential conjoint damages analysis (1.5). Follow up conference with T. Naylor (0.5).	2.00 \$700.00/hr	\$1,400.00
	JSG	Emails to and from conjoint experts re: summarizing today's call and next steps (0.2). Reviewed emails from co-counsel re: sales data and authorization to engage conjoint experts (0.2).	0.40 \$700.00/hr	\$280.00
	SAV	Prepared discovery letters for mailing (.2). Drafted correspondence to Simpsons re discovery requests (.6). Sent same via email (.1).	0.90 \$175.00/hr	\$157.50
	CP	Checked lead chart for the addresses of our class reps and created a letter for each of them.	1.00 \$150.00/hr	\$150.00
	TBN	email defendant re: 30b6 (.1)/ doc review (1)	1.10 \$650.00/hr	\$715.00
1/12/2022	JSG	Reviewed AMS retainer agreement; executed same and forwarded to AMS.	0.50 \$700.00/hr	\$350.00

		<u>Hrs/Rate</u>	<u>Amount</u>
1/12/2022	JSG Emails to and from conjoint experts re: summarizing estimated sales figures and authorization to move forward.	0.40 \$700.00/hr	\$280.00
1/13/2022	JSG Reviewed proposed revised case schedule and related emails.	0.40 \$700.00/hr	\$280.00
	TBN Research the 7 hour 30b6 witness issue and emails with brian re: same in response to defendant's email	0.50 \$650.00/hr	\$325.00
1/14/2022	TBN edits to draft responses to discovery (2.4)/ send back to matthew (.1)	2.50 \$650.00/hr	\$1,625.00
1/17/2022	SAV Discussion with TBN re discovery responses.	0.10 \$175.00/hr	\$17.50
	SAV Email from/to class rep re docs responsive to doc request (.1). Reviewed historical emails for same (.2). Email to TBN re same (.1).Emails to/from class reps re scheduling appt for rogg prep (.1).	0.50 \$175.00/hr	\$87.50
	SAV Phone conf with Alan Armstrong re rogg answers (.8). Drafted rogg answers (1.5).	2.30 \$175.00/hr	\$402.50
	JSG Conference with T. Naylor and R. Sherwood re: depos and doc review coordination.	0.40 \$700.00/hr	\$280.00
	JSG Emails to and from team re: product pricing questions about documents reviewed.	0.40 \$700.00/hr	\$280.00
	TBN work on outlines of 30b6 deponents to be able to provide time estimate sought by defendant (1.6)/ draft memo to co-counsel re: same (.9)	2.50 \$650.00/hr	\$1,625.00

		<u>Hrs/Rate</u>	<u>Amount</u>
1/18/2022	JSG Conference call with defense counsel re: discussed potential for mediation (0.3). Follow up call with co-counsel re: settlement ideas and potential mediators (0.8).	1.10 \$700.00/hr	\$770.00
	JSG Emails to / from team re: pricing and setting up conference call (0.3). Attended strategy conference call with team (1.0); call with defense counsel - left VM (0.1).	1.40 \$700.00/hr	\$980.00
	TBN finish estimate of times for 30b6 and send edited email to defense counsel (.4)/ phone conference with team re: strategy (.6)	1.00 \$650.00/hr	\$650.00
1/20/2022	TBN work on simpson production	0.90 \$650.00/hr	\$585.00
1/21/2022	TBN Research for maintenance free claims in LF advertising (2.8)/ emails with team about same (.3)	3.10 \$650.00/hr	\$2,015.00
	SAV Emails to class reps requesting additional answers (.6). Email to class rep re Dropbox file and time for interview (.2). Edited answers (1.5).	2.30 \$175.00/hr	\$402.50
1/24/2022	JSG Emails to and from defense counsel re: mediation dates(0.3); follow up emails to and from team.re: same (0.3).	0.60 \$700.00/hr	\$420.00
	CP Email from/to new lead; (.1) phone call with, and email to, new lead (.2); updated chart (.1).	0.40 \$150.00/hr	\$60.00
	TBN edits to motion to stay pending mediation	0.50 \$650.00/hr	\$325.00
	TBN work on our class rep responses	2.00 \$650.00/hr	\$1,300.00

		<u>Hrs/Rate</u>	<u>Amount</u>
1/24/2022	RBS Edits to draft Joint Motion for Stay (1.8); emails with T. Naylor re same (.2).	2.00 \$600.00/hr	\$1,200.00
1/25/2022	JSG Conference with team re: mediation demand and strategy.	0.60 \$700.00/hr	\$420.00
	JSG Reviewed LF yearly customer figures and refund figures and related discovery.	0.60 \$700.00/hr	\$420.00
	JSG Attended conference call with LF counsel to discuss mediation timing and process (0.7). Drafted follow up email to team re: additional discovery/information to request from LF (0.5).	1.20 \$700.00/hr	\$840.00
	TBN Telephone conference with defendant (.7)/review their edits to the motion to stay (.3)	1.00 \$650.00/hr	\$650.00
	SAV Email to TBN re doc production question.	0.10 \$175.00/hr	\$17.50
	SAV Meeting with TBN re status of roggs and extension re discovery due date.	0.10 \$175.00/hr	\$17.50
	JSG Reviewed draft joint request to stay proceedings (0.3). Emails to / from team re: initial demand (0.2).	0.50 \$700.00/hr	\$350.00
1/26/2022	JSG Call with Steve Gaskin and Patty re: feasibility of conjoint (0.3); updated Steve and Patty on parties' agreement to go to mediation in March (0.1). Email to team updating them that conjoint is feasible (0.2).	0.60 \$700.00/hr	\$420.00
1/27/2022	CP Phone call with new lead (.2); updated chart (.1); email to JSG, TBN, and SV with info (.1); emails to SV with photos from Alan Armstrong (.1).	0.50 \$150.00/hr	\$75.00

			<u>Hrs/Rate</u>	<u>Amount</u>
1/31/2022	JSG	Reviewed and edited letter to LF counsel re: additional information requested prior to mediation.	0.30 \$700.00/hr	\$210.00
	SAV	Emails and phone calls to/from class reps re docs for production (.8). Created DropBox for class rep docs (.2). Organized docs for production: redact, bates stamp, convert files (4.9).	5.90 \$175.00/hr	\$1,032.50
2/1/2022	JSG	Reviewed letter to LF counsel requesting additional information for upcoming mediation.	0.40 \$700.00/hr	\$280.00
	SAV	Meeting with TBN re status of discovery.	0.20 \$175.00/hr	\$35.00
	SAV	Redacted class rep's documents (.5). Email to class rep re same (.1). Organized docs for production (2.8).	3.40 \$175.00/hr	\$595.00
	TBN	review jeff's edits to defense counsel letter (.2)/ work on plaintiff discovery responses (2.5)	2.70 \$650.00/hr	\$1,755.00
	SAV	Emails to TBN re discovery.	0.10 \$175.00/hr	\$17.50
2/2/2022	CP	Email to new lead via the GS website.	0.20 \$150.00/hr	\$30.00
	SAV	Organized documents for production: bates stamping, created disc (3.6). Drafted responses to RFP (1.3).	4.90 \$175.00/hr	\$857.50
	TBN	work on plaintiff discovery responses to defendant and get them out through stephanie for review and signature	5.50 \$650.00/hr	\$3,575.00

		<u>Hrs/Rate</u>	<u>Amount</u>
2/3/2022	JSG Reviewed email from LF consumer.	0.40 \$700.00/hr	\$280.00
	SAV Drafted RFPs and edited same (2.8). Communicated via email and phone with class reps about Roggs, Verification and docs for production (1.8). Emails from/to TBN re RFPs (.1).	4.70 \$175.00/hr	\$822.50
	TBN plaintiff discovery responses	3.70 \$650.00/hr	\$2,405.00
	RBS Edits to draft RFP objections/responses (1.0); emails with T. Naylor re same (.2).	1.20 \$600.00/hr	\$720.00
2/4/2022	SAV Updated contact list.	0.10 \$175.00/hr	\$17.50
	SAV Email to/from CP re potential class rep's email.	0.10 \$175.00/hr	\$17.50
	SAV Emails from/to potential class member	0.10 \$175.00/hr	\$17.50
	SAV Edited Interrogatory Answers (2.6). Emails and phone conf. with TBN re formatting issue (.2). Created DropBox for doc production and transferred docs to same (.6). Emails from/to co-counsel re doc production (.1). Emails from/to defense counsel re same (.1). Email to class rep re Verification (.1). Email to TBN re status of class reps responsive docs (.1).	3.80 \$175.00/hr	\$665.00
	TBN Finalize and serve rogg responses and doc responses on defendant	4.20 \$650.00/hr	\$2,730.00

		<u>Hrs/Rate</u>	<u>Amount</u>
2/4/2022	JSG Reviewed drop box discovery productions for plaintiffs (0.3) ; conference call with S. Vaaler re: same (0.2).	0.50 \$700.00/hr	\$350.00
	JSG Reviewed letter from LF counsel responding to our requests for information for mediation preparation (0.4); follow up strategy email to team (0.1).	0.50 \$700.00/hr	\$350.00
2/7/2022	JSG Call to counsel for LF consumer in New Hampshire.	0.30 \$700.00/hr	\$210.00
	CP Phone calls with new leads (.2); updated chart (.1); email to JSG, TBN, and SV with info (.1); emails from/to previous lead re her update (.1).	0.50 \$150.00/hr	\$75.00
	JSG Emails to and from co-counsel re: information from LF and settlement structure.	0.20 \$700.00/hr	\$140.00
	JSG Reviewed invoice from AMS (0.2); email to AMS re: payment of invoice from retainer (0.1). Email to J. McIlvain re: same (0.1).	0.40 \$700.00/hr	\$280.00
2/9/2022	CP Emails from/to C Blade re her SA and Release from LF that they haven't followed through on (.1); phone call from prior lead, Bingham, with question for JSG and TBN before LF service call (.1); updated chart (.1); email to JSG and TBN re D. Bingham (.1); email to D. Bingham; follow up email from/to Cirillo (.1).	0.50 \$150.00/hr	\$75.00
	TBN Research what to tell a potential class member that called with a pressing issue (.4)/ email to cheryl to call him back with answer (.1)	0.50 \$650.00/hr	\$325.00
2/11/2022	SAV Email from/to lead.	0.10 \$175.00/hr	\$17.50

		<u>Hrs/Rate</u>	<u>Amount</u>
2/11/2022	SAV Updated master chart.	0.10 \$175.00/hr	\$17.50
2/15/2022	CP Phone call with potential class member, Rhea (.2); updated chart (.1); email to JSG, TBN, SV re: same (.1).	0.40 \$150.00/hr	\$60.00
	TBN Telephone conference with brian w re: mediation and settlement ideas (1.2)/ doc review (.5)	1.70 \$650.00/hr	\$1,105.00
	JSG Reviewed consumer interview notes (0.2); forwarded same to team for consideration to include in mediation statement (0.1). Follow up with T. Naylor re: mediation in person or by Zoom (0.1).	0.40 \$700.00/hr	\$280.00
2/16/2022	JSG Conference with T. Naylor and R. Sherwood re: mediation strategy.	0.40 \$700.00/hr	\$280.00
2/17/2022	JSG Strategy email to B. Warwick.	0.30 \$700.00/hr	\$210.00
	JSG Reviewed draft mediation outline (0.4). Prepared for call with Brian (0.1).	0.50 \$700.00/hr	\$350.00
	JSG LeafFilter call with Brian; discussed mediation and settlement parameters (1.3). Follow up email outlining various settlement valuation ideas and other common fund concepts (0.6).	1.90 \$700.00/hr	\$1,330.00
	TBN work on mediation concepts for damage models	0.80 \$650.00/hr	\$520.00
2/27/2022	TBN review brian's email re: status (.2)/ research in response (.8)/ doc review (1)	2.00 \$650.00/hr	\$1,300.00
2/28/2022	SAV Telephone conferences with LF class reps about mediation.	1.20 \$175.00/hr	\$210.00

			<u>Hrs/Rate</u>	<u>Amount</u>
2/28/2022	SAV	Updated master list.	0.20 \$175.00/hr	\$35.00
3/1/2022	JSG	Reviewed LF consumer complaint (0.1); follow up with C. Pence re: same (0.1).	0.30 \$700.00/hr	\$210.00
	TBN	mediation prep	1.70 \$650.00/hr	\$1,105.00
3/2/2022	RBS	Edits to draft conjoint insert for mediation statement	0.50 \$600.00/hr	\$300.00
	TBN	draft insert for conjoint damages section of mediation brief and circulate	3.20 \$650.00/hr	\$2,080.00
	JSG	Reviewed damages insert for mediation statement (0.2); related emails to team (0.2).	0.40 \$700.00/hr	\$280.00
3/6/2022	JSG	Reviewed and edited mediation statement (1.8). Forwarded edits to team (0.1).	1.90 \$700.00/hr	\$1,330.00
3/7/2022	JSG	Reviewed T. Naylor's edits to mediation statement (0.3); forwarded GS edits to Brian (0.1). Follow up with C. Pence re: # of LF consumers on GS list (0.1).	0.50 \$700.00/hr	\$350.00
	TBN	edits to draft mediation statement and send to jeff (3.8)/ review email from brian re: call from defense counsel (.2)	4.00 \$650.00/hr	\$2,600.00
3/8/2022	JSG	Emails to and from Brian re: mediation statement strategy.	0.30 \$700.00/hr	\$210.00
	JSG	Conference with Brian and Todd to discuss mediation statement and related strategy (0.4); reviewed and edited meditation statement accordingly (1.7). Emailed near final version of mediation statement to Brian (0.2).	2.30 \$700.00/hr	\$1,610.00

		<u>Hrs/Rate</u>	<u>Amount</u>
3/8/2022	TBN work on LF mediation statement and send to jeff (.9)/ conference with Brian and Jeff re: damages (1.5)	2.40 \$650.00/hr	\$1,560.00
3/9/2022	JSG Communications with class member re: issues with recently installed LF system.	0.60 \$700.00/hr	\$420.00
	TBN prep for mediation and communicate with class reps	1.70 \$650.00/hr	\$1,105.00
3/10/2022	JSG Emails to / from team re: setting up call to discuss communications from mediator (0.2). Attended team call (0.8).	1.10 \$700.00/hr	\$770.00
	TBN mediation call (.7)/ doc review (2.0)	2.70 \$650.00/hr	\$1,755.00
	SAV Email to potential class member requesting additional information(.1). Reviewed JSG's email from/to potential class member (.1).	0.20 \$175.00/hr	\$35.00
	JSG Emails to and from team re: settlement structure (0.3); recent Godiva claims made settlement attacked by certain state AGs (0.2).	0.50 \$700.00/hr	\$350.00
3/11/2022	TBN discuss mediation approach with jeff (.5)/ call with brian and jeff (.5)	1.00 \$650.00/hr	\$650.00
	TBN doc review in advance of mediation (2)/ research re: hunter's comments on possible limited class (.4)	2.40 \$650.00/hr	\$1,560.00
	JSG Strategy call with respected class attorney re: current status per update from mediator.	0.40 \$700.00/hr	\$280.00
	JSG Emails to and from LF consumer who complained to LF corporate (0.3). Follow up emails to team re: does McCann appear on LF's	0.50 \$700.00/hr	\$350.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		list of customers who complained to LF corporate (0.2).		
3/14/2022	TBN	prep for mediation (.3)/ doc review (.8)	1.10 \$650.00/hr	\$715.00
	SAV	Emails from/to potential class member re case status.	0.10 \$175.00/hr	\$17.50
3/15/2022	JSG	Reviewed LF's mediation statement (1.0); prepared for mediation (0.5).	1.60 \$700.00/hr	\$1,120.00
	RBS	Confer with T. Naylor and J. Goldenberg re potential settlement structures	0.50 \$600.00/hr	\$300.00
	TBN	mediation prep (1)/ doc review (2.5)	3.50 \$650.00/hr	\$2,275.00
3/16/2022	TBN	travel to atlanta for mediation	4.90 \$650.00/hr	\$3,185.00
	SAV	Reviewed Wayback for brochures.	2.40 \$175.00/hr	\$420.00
	JSG	Prepared for mediation. Meeting with team.	2.50 \$700.00/hr	\$1,750.00
	JSG	Travel to Atlanta for mediation.	5.00 \$700.00/hr	\$3,500.00
	SAV	Prepared file for JSG.	0.10 \$175.00/hr	\$17.50
3/17/2022	JSG	Prepared for and attended mediation	8.60 \$700.00/hr	\$6,020.00
	TBN	travel back to cincy	5.40 \$650.00/hr	\$3,510.00

		<u>Hrs/Rate</u>	<u>Amount</u>
3/17/2022	TBN attend mediation	8.00 \$650.00/hr	\$5,200.00
	JSG Travel from Atlanta to Cincinnati.	5.00 \$700.00/hr	\$3,500.00
3/21/2022	TBN follow up re: notice to the court (.2)/ revise draft and comments (.4)/ approve and let defense counsel know (.2)	0.80 \$650.00/hr	\$520.00
3/28/2022	JSG Reviewed sales docs received from LF customer who cancelled contract with LF prior to installation.	0.80 \$700.00/hr	\$560.00
	JSG Conference call with team re: mediation response.	0.70 \$700.00/hr	\$490.00
	TBN work on possible settlement (.6)/ call with brian and jeff re: remaining issues (.5)	1.10 \$650.00/hr	\$715.00
	JSG Emails to and from team re: LF's response and status of settlement negotiations (0.3); set up call with team for later this afternoon to discuss mediation (0.1).	0.40 \$700.00/hr	\$280.00
3/29/2022	JSG Mediation strategy call with team (0.7). Reviewed follow up email to mediator (0.1).	0.80 \$700.00/hr	\$560.00
	TBN Telephone conference with team re: status of discussions	0.70 \$650.00/hr	\$455.00
	JSG Emails to and from team re: status of ongoing negotiations.	0.40 \$700.00/hr	\$280.00
3/30/2022	TBN Telephone conference with mediator and brian	0.50 \$650.00/hr	\$325.00

			<u>Hrs/Rate</u>	<u>Amount</u>
3/30/2022	JSG	Reviewed in house counsel information and related emails.	0.30 \$700.00/hr	\$210.00
	JSG	Conference with team and mediator.	0.50 \$700.00/hr	\$350.00
4/1/2022	TBN	work on MOU (2.5)/ correspond with defendant and brian re: same (.3)/ research on scope of release (.6)/ finalize and execute (.3)	3.70 \$650.00/hr	\$2,405.00
4/7/2022	SAV	Telephone conference with lead re LF resolution offer.	0.10 \$175.00/hr	\$17.50
4/8/2022	SAV	Updated lead chart.	0.10 \$175.00/hr	\$17.50
4/11/2022	SAV	Telephone conference with consumer.	0.20 \$175.00/hr	\$35.00
	SAV	Updated master chart.	0.10 \$175.00/hr	\$17.50
4/18/2022	JSG	Email to team setting up call for tomorrow.	0.30 \$700.00/hr	\$210.00
4/19/2022	JSG	Prepared for and attended conference with co-counsel re: implementing settlement.	0.60 \$700.00/hr	\$420.00
	JSG	Calls to GS class reps to discuss settlement.	1.70 \$700.00/hr	\$1,190.00
	TBN	Telephone conference with co-counsel (.5)/ prep for call (.1)	0.60 \$650.00/hr	\$390.00
	TBN	work on settlement agreement	1.20 \$650.00/hr	\$780.00

			<u>Hrs/Rate</u>	<u>Amount</u>
4/27/2022	JSG	Calls to class reps (left VMs) re: terms of the settlement (0.4); drafted and sent follow up emails (0.2).	0.60 \$700.00/hr	\$420.00
	JSG	Conference call with class reps from Washington to discuss settlement (0.6). Follow up email to team (0.1).	0.70 \$700.00/hr	\$490.00
5/4/2022	SAV	Email from/to LF customer and T/C CP re same.	0.10 \$175.00/hr	\$17.50
	SAV	Updated master chart.	0.10 \$175.00/hr	\$17.50
5/5/2022	JSG	Call to Cory Simpson to discuss potential terms of settlement. Left VM.	0.10 \$700.00/hr	\$70.00
5/6/2022	TBN	draft settlement documents	2.50 \$650.00/hr	\$1,625.00
	JSG	Call to Cory to discuss settlement (0.5). Follow up email to team (0.1).	0.60 \$700.00/hr	\$420.00
5/9/2022	TBN	draft settlement agreement	3.10 \$650.00/hr	\$2,015.00
5/10/2022	TBN	draft settlement agreement	1.50 \$650.00/hr	\$975.00
5/11/2022	TBN	draft settlement agreement (6.8)/ send draft to brian with comments (.5)/ let defense counsel know it is coming this week(.1)	7.40 \$650.00/hr	\$4,810.00
5/12/2022	TBN	draft notice and claim form	5.90 \$650.00/hr	\$3,835.00
5/13/2022	JSG	Reviewed and edited settlement agreement.	1.90 \$700.00/hr	\$1,330.00

			<u>Hrs/Rate</u>	<u>Amount</u>
5/13/2022	JSG	Continued to review and edit Settlement Agreement.	1.00 \$700.00/hr	\$700.00
	TBN	draft settlement documents and notice (5.7)/ call with brian re: same (.5)	6.20 \$650.00/hr	\$4,030.00
	JSG	Conference with T. Naylor re: status of the settlement agreement draft.	0.20 \$700.00/hr	\$140.00
5/14/2022	TBN	Finalize settlement agreement draft based on brian and jeff's changes and send to defense counsel	1.60 \$650.00/hr	\$1,040.00
5/24/2022	TBN	review recent updates to chart of class member complaints	1.00 \$650.00/hr	\$650.00
	SAV	Telephone call to potential class rep.	0.10 \$175.00/hr	\$17.50
5/25/2022	TBN	review LF's changes to the settlement agreement (1.2)/ emails with brian re: same (.3)	1.50 \$650.00/hr	\$975.00
	SAV	Phone calls from potential class members.	0.20 \$175.00/hr	\$35.00
	SAV	Updated chart.	0.20 \$175.00/hr	\$35.00
5/26/2022	TBN	draft summary memo of changes made by LF to the SA	2.40 \$650.00/hr	\$1,560.00
5/27/2022	TBN	finish memo on SA (.5); call with brian (.4); research on scope of release requirements in the 6th circuit (3.3); finish redline of SA and send back to defendant (1.3)	5.50 \$650.00/hr	\$3,575.00
6/1/2022	SAV	Phone conf. with LF customer.	0.20 \$175.00/hr	\$35.00

		<u>Hrs/Rate</u>	<u>Amount</u>
6/1/2022	SAV Updated chart.	0.10 \$175.00/hr	\$17.50
6/2/2022	TBN settlement- research for issue with the release re: property damage claims (1); call with defendant and brian re: same (.7); locate and forward order to defense counsel re: sealing in the SD of ohio (.3); draft joint report for filing with court tomorrow (.8); work on language for revision to Settlement Agreement per call with defendant (2.4)	5.20 \$650.00/hr	\$3,380.00
6/3/2022	TBN Court filing- follow up with defense counsel re: any potential edits to the status report and ensure that it gets filed	0.70 \$650.00/hr	\$455.00
6/6/2022	TBN Telephone conference with opposing counsel re: settlement agreement details (.5)/ type up notes after call to distribute(.2)	0.70 \$650.00/hr	\$455.00
	SAV Phone calls from potential class members.	0.80 \$175.00/hr	\$140.00
	SAV Updated LF contact list.	0.10 \$175.00/hr	\$17.50
	SAV Email to JSG re caller's issue.	0.20 \$175.00/hr	\$35.00
6/7/2022	JSG Reviewed emails to from team.	0.40 \$700.00/hr	\$280.00
	SAV Telephone conference with consumer.	0.70 \$175.00/hr	\$122.50
	RBS Strategy call re release language	0.50 \$600.00/hr	\$300.00

		<u>Hrs/Rate</u>	<u>Amount</u>
6/7/2022	TBN edits to brian's email to defense counsel re: our position on the release language (.6)/ correspondence back and forth re: my reasons for those edits (.2)	0.80 \$650.00/hr	\$520.00
	TBN Telephone conference with team re: strategy on how to handle settlement agreement dispute with defendant (.6); prep for call by doing research on release terms of consequential damage claims (1.7); send email before call with suggested 5.15 language (.1)	2.40 \$650.00/hr	\$1,560.00
	JSG Reviewed emails from team re: release language.	0.50 \$700.00/hr	\$350.00
	JSG Conference call with team re: release scope and related issues.	0.50 \$700.00/hr	\$350.00
	SAV Updated contacted list.	0.10 \$175.00/hr	\$17.50
	SAV Email to JSG/TBN re consumer's fraud claim (.1). Email from/to consumer re design issue (.1).	0.20 \$175.00/hr	\$35.00
6/9/2022	TBN work on notice and claim form	3.60 \$650.00/hr	\$2,340.00
6/10/2022	TBN review class member contact chart for property damage complaints	1.40 \$650.00/hr	\$910.00
6/15/2022	JSG Emails to and from team re: communications with mediator re: release issues.	0.40 \$700.00/hr	\$280.00
6/16/2022	JSG Call with co-sounsel re: release issue and notice issue.	0.40 \$700.00/hr	\$280.00

		<u>Hrs/Rate</u>	<u>Amount</u>
6/17/2022	JSG Emailed settlement notices, claim forms, etc. to co counsel.	0.40 \$700.00/hr	\$280.00
6/19/2022	JSG Reviewed example motion for preliminary approval (0.4); emailed same to team (0.1).	0.50 \$700.00/hr	\$350.00
6/20/2022	RBS Edits to draft settlement agreement	1.00 \$600.00/hr	\$600.00
	TBN draft proposed order (2.5)/ work on brian's edits to the settlement notice and confirm he did not have substantive changes to the claim form (1.6)/ review and analyze opposing counsel's redline to the settlement agreement (1.8)	5.90 \$650.00/hr	\$3,835.00
6/21/2022	JSG Conference with T. Naylor and R. Sherwood re: opt out information in notice.	0.30 \$700.00/hr	\$210.00
	TBN research to draft settlement motion and memo	7.60 \$650.00/hr	\$4,940.00
	JSG Emails to and from team re: status of preliminary approval memo (0.2). Follow up with T. Naylor re: same (0.1).	0.30 \$700.00/hr	\$210.00
	JSG Reviewed proposed settlement agreement language about notice language about opting out to preserve property damage claims.	0.40 \$700.00/hr	\$280.00
6/22/2022	JSG Reviewed KCC admin proposal (0.3); email to team re: proposal from other vendors (0.2).	0.50 \$700.00/hr	\$350.00
	RBS Edits to draft notice.	1.50 \$600.00/hr	\$900.00

		<u>Hrs/Rate</u>	<u>Amount</u>
6/22/2022	TBN draft settlement memo and supporting filings-jeff decl. and firm resume; order, notice (8.4); review KCC administration proposal and discuss with team (.5)	8.90 \$650.00/hr	\$5,785.00
6/23/2022	RBS Edits to proposed order and preliminary approval memo	2.00 \$600.00/hr	\$1,200.00
	TBN draft and revise memo, order, and notice (8.9)/ correspond with defense counsel about their timing on redlines on what we have sent them (.4)	9.30 \$650.00/hr	\$6,045.00
6/24/2022	JSG Reviewed motion for preliminary approval and jsg declaration (0.6); follow up with T. Naylor re: same (0.2).	0.80 \$700.00/hr	\$560.00
	TBN Finalize all documents for filing today (7.5)/ calls with Greg and Trevor re: edits to docs (1); follow up re: Mango decl. (.5); follow up with Settlement Administrator for declaration and redline to add information (.6)	9.60 \$650.00/hr	\$6,240.00
	JSG Discussion with T. Naylor re: settlement implementation dates chart (0.3). Related conversation about settlement docs status and edits from Defense counsel (0.2).	0.50 \$700.00/hr	\$350.00
6/28/2022	SAV Telephone conference with intake.	0.10 \$175.00/hr	\$17.50
	SAV Email to attys re ph. conf.	0.10 \$175.00/hr	\$17.50
	SAV Updated contact chart.	0.10 \$175.00/hr	\$17.50

		<u>Hrs/Rate</u>	<u>Amount</u>
7/1/2022	CP Phone call with and email to consumer to get his info and have him send LF ad he wanted to forward to GS.	0.20 \$150.00/hr	\$30.00
7/5/2022	CP Calls from LF customers (.4); emailed notes to JSG, TBN, SV (.2); updated chart (.3); emails to LF customers (.1).	1.00 \$150.00/hr	\$150.00
7/6/2022	CP Emails to LF customers who reached out via the website (.2) and added them to the chart (.2).	0.40 \$150.00/hr	\$60.00
7/8/2022	JSG Reviewed and responded to emails from LF consumers.	0.40 \$700.00/hr	\$280.00
7/12/2022	JSG Email to LF consumer providing an update on the litigation/settlement. Forwarded same to team.	0.40 \$700.00/hr	\$280.00
7/13/2022	CP Phone calls with LF customers who contacted GS (.2); emails to LF customers who contacted GS via the website (.1); updated master chert (.1).	0.40 \$150.00/hr	\$60.00
7/14/2022	CP Phone calls with LF customers who contacted GS (.3); emails to LF customers who contacted GS via the website (.1); updated master chert (.1).	0.50 \$150.00/hr	\$75.00
7/15/2022	CP Spoke to LF consumers who contacted the office (.3); emailed consumers who reached out via the website (.1).	0.40 \$150.00/hr	\$60.00
7/18/2022	CP Emails and phone calls with LF consumers (.6); updated the master chart (.4).	1.00 \$150.00/hr	\$150.00
	SAV Email from/to potential class member	0.10 \$175.00/hr	\$17.50

		<u>Hrs/Rate</u>	<u>Amount</u>
7/19/2022	CP Phone calls/emails with LF customers (.3); updated chart (.1); email to JSG, TBN, SV with notes (.1).	0.50 \$150.00/hr	\$75.00
7/21/2022	CP Phone calls with LF consumers contacting GS (.1); email to LF contact who sent an update (.1); email to J Goldenberg and T. Naylor re: update from someone on our master list (.1); email to Bayha re his request for an update (.1); updated chart (.1).	0.50 \$150.00/hr	\$75.00
	SAV Email from/to LF customer and email to CP with LF customer contact info.	0.10 \$175.00/hr	\$17.50
7/25/2022	JSG Returned call to LF consumer - B. Wilson. Follow up email to B. Wilson.	0.50 \$700.00/hr	\$350.00
	JSG Attended call with defense counsel to discuss AG's desire to discuss settlement.	0.40 \$700.00/hr	\$280.00
	TBN Telephone conference re: AG inquiry	0.40 \$650.00/hr	\$260.00
	SAV Telephone conference with potential class member.	0.10 \$175.00/hr	\$17.50
	SAV Updated chart with contact info.	0.10 \$175.00/hr	\$17.50
	SAV Reviewed settlement agreement and motion for prelim approval.	0.20 \$175.00/hr	\$35.00
7/26/2022	JSG Calendared friday's call with Cal. AG and others.	0.10 \$700.00/hr	\$70.00
7/28/2022	CP Emails to/from LF contacts (.1); phone call with F. Cox re: case status (.2); updates to chart (.1).	0.40 \$150.00/hr	\$60.00

			<u>Hrs/Rate</u>	<u>Amount</u>
7/29/2022	JSG	Conference with state AGs to discuss settlement.(Cal; Fl; Tenn; Mich; NY; NJ; Ohio; Texas; Indiana; Idaho). Follow up call with B. Warwick re: same.	1.90 \$700.00/hr	\$1,330.00
8/1/2022	SAV	Telephone conference with LF customer.	0.10 \$175.00/hr	\$17.50
	JSG	Email to Brian re: follow up from AG class on Friday of last week.	0.20 \$700.00/hr	\$140.00
	JSG	Conference with Todd and Bob to provide summary of AG class on Friday of last week.	0.40 \$700.00/hr	\$280.00
8/2/2022	SAV	Phone call from customer. Updated chart.	0.10 \$175.00/hr	\$17.50
	SAV	Telephone conference with LF customer..	0.10 \$175.00/hr	\$17.50
	SAV	Email to LF customer re contacts for issues.	0.10 \$175.00/hr	\$17.50
	SAV	Reviewed internet, WD for LF contact info for consumer.	0.40 \$175.00/hr	\$70.00
8/3/2022	SAV	Phone call from customer.	0.10 \$175.00/hr	\$17.50
	SAV	Updated chart.	0.10 \$175.00/hr	\$17.50
8/8/2022	SAV	Emails to/from CP re status of responding to LF customer.	0.10 \$175.00/hr	\$17.50
8/9/2022	JSG	Reviewed emails from LF consumers.	0.40 \$700.00/hr	\$280.00

			<u>Hrs/Rate</u>	<u>Amount</u>
8/9/2022	SAV	Telephone conference with class member.	0.10 \$175.00/hr	\$17.50
	SAV	Email to class member.	0.10 \$175.00/hr	\$17.50
	SAV	Reviewed Settlement Agreement for info to provide class member.	0.50 \$175.00/hr	\$87.50
8/18/2022	TBN	correspond with the settlement administrator re: the settlement website and provide materials to post	1.20 \$650.00/hr	\$780.00
8/19/2022	RBS	Assist T. Naylor confirm relevant dates for settlement website.	1.00 \$600.00/hr	\$600.00
	TBN	review mock up of website and communicate with SA about the dates to confirm (1)/ provide new documentst to post and disucss with jeff and brian which ones to provide (.6)	1.60 \$650.00/hr	\$1,040.00
8/22/2022	JSG	Reviewed emails from LF consumers (0.1); follow up email to S. Vaaler instructing her to call consumer (0.1).	0.20 \$700.00/hr	\$140.00
9/19/2022	SAV	Phone conference with potential class member (.2). Discussion with TBN re same (.1).	0.30 \$175.00/hr	\$52.50
9/21/2022	SAV	Telephone conferences with leads re settlement (.3). Updated chart (.2). Email from/ to lead re case status (.1).	0.60 \$175.00/hr	\$105.00
9/22/2022	SAV	Telephone conference with potential class member (.1). Ph. calls to online contacts re settlement (.1). Phone conf with contact (.1).	0.30 \$175.00/hr	\$52.50
	SAV	Email to class member.	0.10 \$175.00/hr	\$17.50

		<u>Hrs/Rate</u>	<u>Amount</u>
9/26/2022	TBN go through proposed final versions of settlement notice, claim form, IVR phone script, and website (4)/ draft list of issues and send to co-counsel for their input (.4)	4.40 \$650.00/hr	\$2,860.00
	SAV Telephone conference with potential class member re settlement	0.10 \$175.00/hr	\$17.50
9/28/2022	TBN get approval for proposed changes to settlement docs and website from opposing counsel (1), work with settlement administrator on implementing proposed changes (1.9)	2.90 \$650.00/hr	\$1,885.00
	SAV Phone conversation with potential class member re settlement.	0.30 \$175.00/hr	\$52.50
9/29/2022	TBN review and correct settlement notice, claim form, and website (2.4)/ emails with defense counsel and settlement administrator re: same (.4)	2.80 \$650.00/hr	\$1,820.00
9/30/2022	TBN Conference with Jeff G re: status of settlement docs one week out from notice date	0.20 \$650.00/hr	\$130.00
	JSG Reviewed notices (0.6). Email to KCC re: question about claim form (0.1).	0.70 \$700.00/hr	\$490.00
10/3/2022	TBN work on settlement docs in advance of friday's notice date	0.70 \$650.00/hr	\$455.00
	SAV Emails from/to class rep re settlement status.	0.20 \$175.00/hr	\$35.00
	RBS Edits to draft class notice (.9); emails with T. Naylor re same (.1).	1.00 \$600.00/hr	\$600.00
	JSG Emails to and from team re: status of claim form and website review.	0.40 \$700.00/hr	\$280.00

		<u>Hrs/Rate</u>	<u>Amount</u>
10/3/2022	SAV Reviewed settlement site and settlement agreement re same.	0.60 \$175.00/hr	\$105.00
10/10/2022	CP Phone calls with class members regarding the notice and claim form (.7); mailed notice and claim form to 3 people who received post card and couldn't access documents by computer (.2). Assisted two class members with opting out (.3).	1.20 \$150.00/hr	\$180.00
	JSG Call with opt out class member (0.5). Follow up with KCC again about the opt out email address not functioning (0.2).	0.80 \$700.00/hr	\$560.00
	TBN contacts with class members and a potential class member (.7)/ follow up with Settlement Admin to see if he is on the list (.3)/ call number to see if it is working and check the email per the objection (.2)	1.20 \$650.00/hr	\$780.00
	JSG Emails to and from team re: collecting opt out information from class members seeking assistance (0.4).Follow up emails to KCC re: same (0.2).	0.70 \$700.00/hr	\$490.00
	JSG Reviewed 1-844 number and spoke to live representative (0.4); drafted email to KCC re: improvements to settlement admin email address and training for phone reps (0.3).	0.70 \$700.00/hr	\$490.00
10/11/2022	CP Phone calls with class members regarding the notice and claim form (.6); assisted two class members with opting out, and filing a claim through the website (.4).	1.00 \$150.00/hr	\$150.00
	TBN calls with class members (.6)/ review court's order re: need for report (.1)/ emails with co-counsel and defense counsel re: same (.2)	0.90 \$650.00/hr	\$585.00

		<u>Hrs/Rate</u>	<u>Amount</u>
10/11/2022	JSG Emails to and from Court's clerk re: opt out email address (0.4). Follow up with defense counsel and with KCC (0.7). Call with co-counsel re: opt outs and KCC issues (0.6).	1.80 \$700.00/hr	\$1,260.00
	JSG Reviewed emails from KCC re: addressing 1-844 phone number and opt out email address issues (0.4). Emails to KCC re: can KCC identify class members who attempted to opt out using the email address but were unsuccessful (0.4). Related follow up (0.2)	1.10 \$700.00/hr	\$770.00
	JSG Emails to KCC re: opt out email address issue and 1-844 issues. .	0.60 \$700.00/hr	\$420.00
10/12/2022	CP Phone calls with class members regarding the notice and claim form.	1.00 \$150.00/hr	\$150.00
	TBN calls with class members (.5)/ check voucher language in SA to see how they will be distributed and inform staff for future calls (.2)	0.70 \$650.00/hr	\$455.00
	SAV Telephone conferences with potential class members re settlement benefits.	0.50 \$175.00/hr	\$87.50
	SAV Discussion with JM re settlement benefits.	0.10 \$175.00/hr	\$17.50
10/13/2022	CP Phone calls with class members regarding the notice and claim form.	1.20 \$150.00/hr	\$180.00
	TBN calls with class members (.8)/ follow up with defense counsel about specific class member issue (.1)	0.90 \$650.00/hr	\$585.00
	SAV Telephone conferences with class members.	3.40 \$175.00/hr	\$595.00

			<u>Hrs/Rate</u>	<u>Amount</u>
10/13/2022	SAV	Emails to CP re status of calls referred to GS by co-counsel.	0.10 \$175.00/hr	\$17.50
	SAV	Assisted class member with claim form.	0.10 \$175.00/hr	\$17.50
	SAV	Prepared mailing to claimant re enclosed claim confirmation.	0.20 \$175.00/hr	\$35.00
10/14/2022	CP	Phone calls with class members regarding the notice and claim form (1); assisted a class member with filing a claim through the website (.2).	1.20 \$150.00/hr	\$180.00
	TBN	class member inquires re: settlement details	0.40 \$650.00/hr	\$260.00
10/17/2022	CP	Phone calls with class members regarding the notice and claim form (1.2); mailed a notice and claim for to class member who misplaced her docs (.2)	1.40 \$150.00/hr	\$210.00
	JSG	Reviewed and edited KCC declaration re: opt out email address and 1-844 call-in number (0.3). Reviewed and provided opt out chart to R. Sherwood (0.3).	0.60 \$700.00/hr	\$420.00
	JSG	Reviewed and edited draft Joint Notice re: opt out email address issue and 1-844 number (0.4). Emailed same to counsel for defendant and co-counsel (0.1).	0.50 \$700.00/hr	\$350.00
	JSG	Reviewed KCC final declaration (0.5). Reviewed objections filed to date. Finalized Joint Report (0.3).	0.80 \$700.00/hr	\$560.00
	SAV	Email from class member	0.10 \$175.00/hr	\$17.50

		<u>Hrs/Rate</u>	<u>Amount</u>
10/17/2022	JSG Conference with R. Sherwood re: drafting response to Court's request for information about opt out email address and 1-844 call-in number.	0.40 \$700.00/hr	\$280.00
	RBS Draft Joint Report re settlement email and telephone issues (2.0); research same (1.0); (confer with J. Goldenberg re same (.2)	3.20 \$600.00/hr	\$1,920.00
	SAV Phone conferences with class members	0.20 \$175.00/hr	\$35.00
10/18/2022	SAV Email to claimant with attached confirmation of submission.	0.10 \$175.00/hr	\$17.50
	RBS Research authorities in preparation for drafting attorney fee petition	2.00 \$600.00/hr	\$1,200.00
	SAV Phone conf. with class member.	0.10 \$175.00/hr	\$17.50
	SAV Assisted claimant with filing online claim.	0.30 \$175.00/hr	\$52.50
10/19/2022	TBN review objections	0.20 \$650.00/hr	\$130.00
10/20/2022	CP Phone calls with class members regarding the notice and claim form.	0.50 \$150.00/hr	\$75.00
	SAV Phone call to claimant re response to inquiry.	0.10 \$175.00/hr	\$17.50
	SAV Emails to co-counsel (.1). email to to CP re same (.1).	0.20 \$175.00/hr	\$35.00
	SAV Completed claim online for claimant	0.20 \$175.00/hr	\$35.00

			<u>Hrs/Rate</u>	<u>Amount</u>
10/20/2022	SAV	Email to claimant with submission confirmation (.1). Email to/from TBN re status of claimant inquiry (.1).	0.20 \$175.00/hr	\$35.00
	TBN	Telephone conference with class members	0.60 \$650.00/hr	\$390.00
	SAV	Telephone conferences with claimants.	1.10 \$175.00/hr	\$192.50
10/21/2022	CP	Phone calls with class members regarding the notice and claim form (.5); mailed notice and claim form to class member who wanted a hard copy (.2).	0.70 \$150.00/hr	\$105.00
10/24/2022	SAV	Ph. conf. with class member re settlement (.1). Attempt made to file claim for claimant and Email to class member evidencing prior submission (.1). Ph. conf with class member re effect of claim submission on contract (.1). Email to TBN re same (.1). Ph. conf with class member re settlement (.1)	0.50 \$175.00/hr	\$87.50
	CP	Phone calls with class members regarding the notice and claim form.	0.40 \$150.00/hr	\$60.00
	TBN	Research for fee application	3.20 \$650.00/hr	\$2,080.00
10/25/2022	JSG	Reviewed objection; email to team re: same.	0.30 \$700.00/hr	\$210.00
	SAV	Phone conferences with class members re settlement benefits/claims filing.	0.20 \$175.00/hr	\$35.00
	CP	Phone calls with class members regarding the notice and claim form.	0.40 \$150.00/hr	\$60.00

			<u>Hrs/Rate</u>	<u>Amount</u>
10/25/2022	RBS	Assist T. Naylor research awarding attorney fees in 6th Circuit	1.50 \$600.00/hr	\$900.00
	TBN	Fee App Research	3.10 \$650.00/hr	\$2,015.00
10/26/2022	SAV	Phone conf with claimant re objecting and excluding (.2). Assisted caller with search for small claims case status (.2). Phone conf with class member re benefits (.1). Email from/to claimant re LF contract and claim submission (.1). Emails to/from TBN re same (.1).	0.70 \$175.00/hr	\$122.50
	RBS	Continue assisting T. Naylor research awarding attorney fees in 6th Circuit	1.50 \$600.00/hr	\$900.00
	TBN	work on draft of fee app	3.10 \$650.00/hr	\$2,015.00
10/27/2022	JSG	Email to class rep (0.1). Follow up call with class rep, Brian Dearing (0.2).	0.40 \$700.00/hr	\$280.00
	CP	Phone calls with class members regarding the notice and claim form (.4); mailed a notice and claim form to a caller who misplaced his copy (.1).	0.50 \$150.00/hr	\$75.00
	RBS	Draft shell of class representative declarations in support of service awards (1.3); confer with T. Naylor re same (.2).	1.50 \$600.00/hr	\$900.00
	TBN	draft fee app	2.90 \$650.00/hr	\$1,885.00
	SAV	Telephone conferences with class members re benefits and opting out.	0.80 \$175.00/hr	\$140.00

			<u>Hrs/Rate</u>	<u>Amount</u>
10/28/2022	CP	Phone calls with class members regarding the notice and claim form.	0.70 \$150.00/hr	\$105.00
	RBS	Edits to draft fee petition	1.00 \$600.00/hr	\$600.00
	TBN	draft fee petition	1.70 \$650.00/hr	\$1,105.00
10/31/2022	JSG	Reviewed objection	0.20 \$700.00/hr	\$140.00
	JSG	Call to R. Wayne re: declaration - left VM	0.20 \$700.00/hr	\$140.00
	JSG	Call with LF customer - non class member.	0.50 \$700.00/hr	\$350.00
	CP	Phone calls with class members regarding the notice and claim form.	0.40 \$150.00/hr	\$60.00
	RBS	Additional edits to fee petition and supporting exhibits, declarations, etc.	2.00 \$600.00/hr	\$1,200.00
	TBN	finish draft of fee petition and turn over to bob	2.80 \$650.00/hr	\$1,820.00
11/1/2022	CP	Phone calls with class members regarding the notice and claim form (.3); mailed notice and claim form to class member requesting a copy (said he only got postcard and doesn't use a computer) (.1)..	0.40 \$150.00/hr	\$60.00
	RBS	Additional edits to fee petition.	0.70 \$600.00/hr	\$420.00
	TBN	work on class rep declarations	2.80 \$650.00/hr	\$1,820.00

		<u>Hrs/Rate</u>	<u>Amount</u>
11/2/2022	TBN draft class rep declarations with clients (2.5)/ edits to memo (.7)	3.20 \$650.00/hr	\$2,080.00
	JSG Emails to and from T. Naylor re: status of fee motion.	0.20 \$700.00/hr	\$140.00
	JSG Emails to and from team re: expense related to removal and preservation of class rep's LF system.	0.30 \$700.00/hr	\$210.00
11/3/2022	RBS Additional edits to fee petition, supporting exhibits.	2.00 \$600.00/hr	\$1,200.00
	TBN communication with clients re: class rep declarations	2.40 \$650.00/hr	\$1,560.00
	SAV Emails from/ to tbn re declarations.	0.10 \$175.00/hr	\$17.50
	SAV Declarations sent via Adobe Sign to class reps: A. Armstrong, S. Armstrong, B. Dering and GarrettDorsey (.3). Follow up emails sent to T. Dering and C. Simpson re declaration review (.1). Declaration sent to T. Dering via Adobe Sign (.2). Emails to TBN re status of declarations (.2).	0.80 \$175.00/hr	\$140.00
	Professional Services Due:	749.50	\$420,735.00
	TOTAL AMOUNT DUE:		\$420,735.00

Exhibit C

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES ZILINSKY, GERALDINE)	CASE NO. 2:20-cv-6229-MHW-KAJ
ZILINSKY, CORY SIMPSON, MEAGAN,)	
McGINLEY, SANDRA)	
GARRETTDORSEY, BRIAN DERING,)	JUDGE MICHAEL H. WATSON
THERESA DERING, ALAN)	
ARMSTRONG, and SANDY)	
ARMSTRONG, individually and on behalf of)	
all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	
)	
LEAFFILTER NORTH, LLC,)	
)	
Defendant.)	
)	

DECLARATION OF W.B. MARKOVITS

I, W. B. Markovits, under penalty of perjury pursuant to 28 U.S.C. 1746, declare as true the following:

1. This Declaration is provided in support of Class Counsel's Motion for Approval of Attorney Fees and Expenses and Class Representative Service Awards in the above-captioned action.
2. I have been practicing law since 1981 following my graduation from Harvard Law School.
3. I am admitted to and a member in good standing of the Bar of the State of Ohio and am admitted to practice before the United States District Courts for the Southern and Northern Districts of Ohio, the District of Columbia, the U.S. Sixth Circuit Court of Appeals, the U.S. Ninth Circuit Court of Appeals, and the U.S. Supreme Court.

4. I am a member of the Ohio State Bar Association, Cincinnati Bar Association, and Potter Stewart Inn of Court.

5. I am a founding member with the law firm of Markovits, Stock & DeMarco, LLC and my practice primarily consists of litigation in federal and state court with a focus on class action and complex multi-district litigation.

6. I have been actively involved as lead or co-lead class counsel or on lead counsel committees in the following cases, among others:

- a) *Shy v. Navistar International Corp.*, No. 92-cv-0333-WHR (S.D. Ohio) (recently appointed class counsel for a class action settlement valued at over \$742 million);
- b) *Walker v. Nautilus, Inc.*, No. 2:20-cv-3414-EAS (S.D. Ohio) (class counsel for \$4.25 million common fund settlement finally approved on June 28, 2022);
- c) *Bechtel v. Fitness Equipment Services, LLC*, No. 1:19-cv-726-KLL (S.D. Ohio) (class counsel for \$3.65 million common fund settlement finally approved on September 30, 2022);
- d) *In re Fannie Mae Securities Litigation*, No. 1:04-cv-1639, (D.D.C.) (class counsel in representing the Ohio public pension funds as lead plaintiffs in a Section 10b-5 class action resulting in a \$153 million settlement); and,
- e) *Williams v. Duke Energy*, No. 1:08-cv-0046 (S.D. Ohio) (class counsel in a complex antitrust and RICO class action resulting in the court granting final approval of an \$80.875 million settlement);

7. I have represented both plaintiffs and defendants in dozens of cases, including class actions, in state courts and federal courts nationwide over the past 41 years. My firm is currently participating as counsel in over 100 class action cases pending in state and federal courts around the country. Ohio federal courts have recognized me, individually, and my firm as being experienced with handling complex cases including class actions. *Bechtel v. Fitness Equip. Servs., LLC*, No. 1:19-CV-726, 2021 WL 4147766, at *11 (S.D. Ohio Sept. 12, 2021) (“plaintiffs’ attorneys have appeared in this Court many times and have substantial experience

litigating class actions and other complex matters.”). Based upon my experience, I fully understand that class litigation requires a high level of skill, experience, and analytical ability.

8. As such, I am familiar with the time typically expended, and the fees typically charged by attorneys in the Southern District of Ohio, in this region, and throughout the country for representing clients in complex and class action litigation.

9. I have reviewed the relevant experience and firm profiles of Class Counsel as well as the attorney hourly rates applicable to this litigation as contained in their time records (Jeffrey Goldenberg: \$700; Todd Naylor: \$650; Robert Sherwood: \$600; Janet Varnell: \$650; Brian Warwick: \$650; Matthew Peterson: \$450; Erika Willis: \$450). I have also reviewed the hourly rates assigned to the time expended by paralegals and legal assistants who performed work on this case (Stephanie Vaaler (PL): \$175; Cheryl Pence (LA): \$150; Karen Stroley (PL): \$220; Ashleigh Wallace (PL): \$220; Christian Koerner (PL): \$220). I am also familiar with the high quality of work that the law firm Goldenberg Schneider produces having co-counseled with its attorneys in the past and having reviewed its work within the Southern District of Ohio over the past 20 years.

10. Based on my extensive experience in handling complex class action cases in the Southern District of Ohio and the typical hourly rates for counsel based on their requisite experience levels, I believe that hourly rates charged by attorneys Jeffrey Goldenberg, Todd Naylor, Robert Sherwood, Janet Varnell, Brian Warwick, Matthew Peterson, and Erika Willis are within the prevailing range in the Southern District of Ohio for attorneys with equivalent experience and qualifications, especially in large and complex cases such as this.

11. I also believe that the hourly rates assigned to the paralegals and legal assistants who performed work on this case are within the prevailing range in the Southern District of Ohio for large and complex cases such as this.

12. Based upon my experience representing clients in class actions and complex multi-district litigation, it is my opinion that, given the nature of the work performed in this action, the rates billed are reasonable and appropriate.

So declared this 7th day of November 2022 in Cincinnati, Ohio.

/s/ W.B. Markovits

W.B. Markovits

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**DECLARATION OF JAMES ZILINSKY IN SUPPORT OF PLAINTIFFS’
MOTION FOR APPROVAL OF ATTORNEYS’ FEES, EXPENSE
REIMBURSEMENT, AND CLASS REPRESENTATIVE SERVICE AWARDS**

1. I am an adult competent to testify to the matters herein on the basis of my own personal knowledge of the facts and relevant documents, among other things.
2. I am one of the named Plaintiffs in this class action lawsuit against Defendant LeafFilter North, LLC (“LeafFilter”).
3. I recognize that I have a fiduciary duty to the class members in this case.
4. I have at all times acted in the best interest of the class members and vigorously prosecuted this litigation through my attorneys, Jeffrey S. Goldenberg and Todd B. Naylor of Goldenberg Schneider, LPA, and Janet R. Varnell, Matthew Peterson, and Brian Warwick of Varnell & Warwick.

5. As a class representative, I vigorously prosecuted this action to maximize the recovery for the class members. I have remained in contact with my attorneys in order to fully execute my responsibilities as a class representative. I met with and consulted with my attorneys prior to the filing of this case, reviewed many court filings, including the complaint prior to filing, participated in calls and communications with my attorneys and their staff, responded to the LeafFilter's discovery requests, and reviewed and approved the proposed settlement with my attorneys.

6. Throughout this litigation, I have attempted to regularly communicate with and monitor the performance of my attorneys. I believe my attorneys have fully and vigorously prosecuted this action, on my behalf and on behalf of the class members.

7. In representing the interest of the class members since this case was filed, I have had numerous conferences and communications with one or more of my attorneys and their staff, including numerous discussions related to the terms of my representation agreement, the claims in this action, the progress of the litigation, the risks of the case, and the terms of the proposed settlement.

8. My attorneys agreed to represent me on a fully contingent basis, including advancing all costs and expenses so that they would only be paid and reimbursed for their expenses and costs if they achieved a successful result for the Class.

9. It is my understanding that, according to the settlement, LeafFilter has agreed to pay reasonable attorneys' fees and expense reimbursement and reasonable service awards to the Named Plaintiffs, as approved by the Court.

10. It is also my understanding that according to the settlement, my attorneys and I agreed to request that the Court approve an aggregate award of attorneys' fees and expenses not


to exceed \$1,775,000, and individual service awards to each Named Plaintiff household not to exceed \$3,500 each.

11. I believe the Settlement Agreement is fair, reasonable and adequate and is in the best interest of the class members, as it provides meaningful benefits to the class members and provides for the payment of a reasonable fee and expense reimbursement to my attorneys.

12. I fully support my attorneys' request for the payment of \$1,775,000 for attorneys' fees and expenses, and for service awards of \$3,500 per Named Plaintiff household. I believe these payments to be fair and reasonable especially given the meaningful settlement achieved and in light of the contingent nature of the representation as well as the risks undertaken during this litigation, including the risk of nonpayment.

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

Executed on November 3, 2022.


James Zilinsky, Class Representative

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES ZILINSKY, GERALDINE) CASE NO. 2:20-cv-6229-MHW-KAJ
 ZILINSKY, CORY SIMPSON, MEAGAN)
 McGINLEY, SANDRA)
 GARRETTDORSEY, BRIAN DERING,) JUDGE MICHAEL H. WATSON
 THERESA DERING, ALAN)
 ARMSTRONG, and SANDY)
 ARMSTRONG, individually and on behalf of)
 all others similarly situated,)
)
 Plaintiffs,)
)
 v.)
)
 LEAFFILTER NORTH, LLC,)
)
 Defendant.)

**DECLARATION OF JAMES ZILINSKY IN SUPPORT OF PLAINTIFFS’
MOTION FOR APPROVAL OF ATTORNEYS’ FEES, EXPENSE
REIMBURSEMENT, AND CLASS REPRESENTATIVE SERVICE AWARDS**

Pursuant to 28 U.S.C. Section 1746, I, James Zilinsky, declare under penalty of perjury that the foregoing is true and correct:

1. I am an adult competent to testify to the matters herein on the basis of my own personal knowledge of the facts and relevant documents, among other things.
2. I am one of the named Plaintiffs in this class action lawsuit against Defendant LeafFilter North, LLC (“LeafFilter”).
3. I recognize that I have a fiduciary duty to the class members in this case.
4. I have at all times acted in the best interest of the class members and vigorously prosecuted this litigation through my attorneys, Jeffrey S. Goldenberg and Todd B. Naylor of Goldenberg Schneider, LPA, and Janet R. Varnell, Matthew Peterson, and Brian Warwick of Varnell & Warwick.

5. As a class representative, I vigorously prosecuted this action to maximize the recovery for the class members. I have remained in contact with my attorneys in order to fully execute my responsibilities as a class representative. I met with and consulted with my attorneys prior to the filing of this case, reviewed many court filings, including the complaint prior to filing, participated in calls and communications with my attorneys and their staff, responded to the LeafFilter's discovery requests, and reviewed and approved the proposed settlement with my attorneys.

6. Throughout this litigation, I have attempted to regularly communicate with and monitor the performance of my attorneys. I believe my attorneys have fully and vigorously prosecuted this action, on my behalf and on behalf of the class members.

7. In representing the interest of the class members since this case was filed, I have had numerous conferences and communications with one or more of my attorneys and their staff, including numerous discussions related to the terms of my representation agreement, the claims in this action, the progress of the litigation, the risks of the case, and the terms of the proposed settlement.

8. My attorneys agreed to represent me on a fully contingent basis, including advancing all costs and expenses so that they would only be paid and reimbursed for their expenses and costs if they achieved a successful result for the Class.

9. It is my understanding that, according to the settlement, LeafFilter has agreed to pay reasonable attorneys' fees and expense reimbursement and reasonable service awards to the Named Plaintiffs, as approved by the Court.

10. It is also my understanding that according to the settlement, my attorneys and I agreed to request that the Court approve an aggregate award of attorneys' fees and expenses not

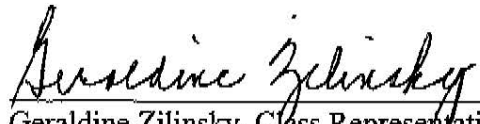
to exceed \$1,775,000, and individual service awards to each Named Plaintiff household not to exceed \$3,500 each.

11. I believe the Settlement Agreement is fair, reasonable and adequate and is in the best interest of the class members, as it provides meaningful benefits to the class members and provides for the payment of a reasonable fee and expense reimbursement to my attorneys.

12. I fully support my attorneys' request for the payment of \$1,775,000 for attorneys' fees and expenses, and for service awards of \$3,500 per Named Plaintiff household. I believe these payments to be fair and reasonable especially given the meaningful settlement achieved and in light of the contingent nature of the representation as well as the risks undertaken during this litigation, including the risk of nonpayment.

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

Executed on November 3, 2022.



Geraldine Zilinsky, Class Representative

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES ZILINSKY, GERALDINE) CASE NO. 2:20-cv-6229-MHW-KAJ
 ZILINSKY, CORY SIMPSON, MEAGAN)
 MCGINLEY, SANDRA)
 GARRETT DORSEY, BRIAN DERING,) JUDGE MICHAEL H. WATSON
 THERESA DERING, ALAN)
 ARMSTRONG, and SANDY)
 ARMSTRONG, individually and on behalf of)
 all others similarly situated,)
)
 Plaintiffs,)
)
 v.)
)
 LEAFFILTER NORTH, LLC,)
)
 Defendant.)
)

**DECLARATION OF CORY SIMPSON IN SUPPORT OF PLAINTIFF’S MOTION FOR
APPROVAL OF ATTORNEYS’ FEES, EXPENSE REIMBURSEMENT, AND CLASS
REPRESENTATIVE SERVICE AWARD**

Pursuant to 28 U.S.C. Section 1746, I, Cory Simpson, declare under penalty of perjury that the foregoing is true and correct:

1. I am an adult competent to testify to the matters herein on the basis of my own personal knowledge of the facts and relevant documents, among other things.
2. I am one of the named Plaintiffs in this class action lawsuit against Defendant LeafFilter North, LLC (“LeafFilter”).
3. I recognize that I have a fiduciary duty to the class members in this case.
4. I have at all times acted in the best interest of the class members and vigorously prosecuted this litigation through my attorneys, Jeffrey S. Goldenberg and Todd B. Naylor of Goldenberg Schneider, LPA, and Janet R. Varnell, Matthew Peterson, and Brian Warwick of Varnell & Warwick.

5. As a class representative, I vigorously prosecuted this action to maximize the recovery for the class members. I have remained in contact with my attorneys in order to fully execute my responsibilities as a class representative. I met with and consulted with my attorneys prior to the filing of this case, reviewed many court filings, including the complaint prior to filing, participated in calls and communications with my attorneys and their staff, responded to the LeafFilter's discovery requests, and reviewed and approved the proposed settlement with my attorneys.

6. Throughout this litigation, I have attempted to regularly communicate with and monitor the performance of my attorneys. I believe my attorneys have fully and vigorously prosecuted this action, on my behalf and on behalf of the class members.

7. In representing the interest of the class members since this case was filed, I have had numerous conferences and communications with one or more of my attorneys and their staff, including numerous discussions related to the terms of my representation agreement, the claims in this action, the progress of the litigation, the risks of the case, and the terms of the proposed settlement.

8. My attorneys agreed to represent me on a fully contingent basis, including advancing all costs and expenses so that they would only be paid and reimbursed for their expenses and costs if they achieved a successful result for the Class.

9. It is my understanding that, according to the settlement, LeafFilter has agreed to pay reasonable attorneys' fees and expense reimbursement and reasonable service awards to the Named Plaintiffs, as approved by the Court.

10. It is also my understanding that according to the settlement, my attorneys and I agreed to request that the Court approve an aggregate award of attorneys' fees and expenses not

to exceed \$1,775,000, and individual service awards to each Named Plaintiff household not to exceed \$3,500 each.

11. I believe the Settlement Agreement is fair, reasonable, and adequate and is in the best interest of the class members, as it provides meaningful benefits to the class members and provides for the payment of a reasonable fee and expense reimbursement to my attorneys.

12. I fully support my attorneys' request for the payment of \$1,775,000 for attorneys' fees and expenses, and for service awards of \$3,500 per Named Plaintiff household. I believe these payments to be fair and reasonable especially given the meaningful settlement achieved and in light of the contingent nature of the representation as well as the risks undertaken during this litigation, including the risk of nonpayment.

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

Executed on November 3, 2022.

Cory Simpson

Cory Simpson, Class Representative

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES ZILINSKY, GERALDINE) CASE NO. 2:20-cv-6229-MHW-KAJ
 ZILINSKY, CORY SIMPSON, MEAGAN,)
 MCGINLEY, SANDRA)
 GARRETT DORSEY, BRIAN DERING,) JUDGE MICHAEL H. WATSON
 THERESA DERING, ALAN)
 ARMSTRONG, and SANDY)
 ARMSTRONG, individually and on behalf of)
 all others similarly situated,)
)
 Plaintiffs,)
)
 v.)
)
 LEAFFILTER NORTH, LLC,)
)
 Defendant.)
)

**DECLARATION OF MEAGAN McGINLEY IN SUPPORT OF PLAINTIFFS' MOTION
FOR APPROVAL OF ATTORNEYS' FEES, EXPENSE REIMBURSEMENT, AND
CLASS REPRESENTATIVE SERVICE AWARDS**

Pursuant to 28 U.S.C. Section 1746, I, Meagan McGinley, declare under penalty of perjury that the foregoing is true and correct:

1. I am an adult competent to testify to the matters herein on the basis of my own personal knowledge of the facts and relevant documents, among other things.
2. I am one of the named Plaintiffs in this class action lawsuit against Defendant LeafFilter North, LLC (“LeafFilter”).
3. I recognize that I have a fiduciary duty to the class members in this case.
4. I have at all times acted in the best interest of the class members and vigorously prosecuted this litigation through my attorneys, Jeffrey S. Goldenberg and Todd B. Naylor of Goldenberg Schneider, LPA, and Janet R. Varnell, Matthew Peterson, and Brian Warwick of Varnell & Warwick.

5. As a class representative, I vigorously prosecuted this action to maximize the recovery for the class members. I have remained in contact with my attorneys in order to fully execute my responsibilities as a class representative. I met with and consulted with my attorneys prior to the filing of this case, reviewed many court filings, including the complaint prior to filing, participated in calls and communications with my attorneys and their staff, responded to the LeafFilter's discovery requests, and reviewed and approved the proposed settlement with my attorneys.

6. Throughout this litigation, I have attempted to regularly communicate with and monitor the performance of my attorneys. I believe my attorneys have fully and vigorously prosecuted this action, on my behalf and on behalf of the class members.

7. In representing the interest of the class members since this case was filed, I have had numerous conferences and communications with one or more of my attorneys and their staff, including numerous discussions related to the terms of my representation agreement, the claims in this action, the progress of the litigation, the risks of the case, and the terms of the proposed settlement.

8. My attorneys agreed to represent me on a fully contingent basis, including advancing all costs and expenses so that they would only be paid and reimbursed for their expenses and costs if they achieved a successful result for the Class.

9. It is my understanding that, according to the settlement, LeafFilter has agreed to pay reasonable attorneys' fees and expense reimbursement and reasonable service awards to the Named Plaintiffs, as approved by the Court.

10. It is also my understanding that according to the settlement, my attorneys and I agreed to request that the Court approve an aggregate award of attorneys' fees and expenses not

to exceed \$1,775,000, and individual service awards to each Named Plaintiff household not to exceed \$3,500 each.

11. I believe the Settlement Agreement is fair, reasonable, and adequate and is in the best interest of the class members, as it provides meaningful benefits to the class members and provides for the payment of a reasonable fee and expense reimbursement to my attorneys.

12. I fully support my attorneys' request for the payment of \$1,775,000 for attorneys' fees and expenses, and for service awards of \$3,500 per Named Plaintiff household. I believe these payments to be fair and reasonable especially given the meaningful settlement achieved and in light of the contingent nature of the representation as well as the risks undertaken during this litigation, including the risk of nonpayment.

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

Executed on November 3, 2022.

SIMPSON.MEAGAN.M
CGINLEY.1408010450

Digitally signed by
SIMPSON.MEAGAN.MCGINLEY.14
08010450
Date: 2022.11.03 11:41:12 -04'00'

Meagan McGinley, Class Representative

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES ZILINSKY, GERALDINE) CASE NO. 2:20-cv-6229-MHW-KAJ
 ZILINSKY, CORY SIMPSON, MEAGAN)
 MCGINLEY, SANDRA)
 GARRETT DORSEY, BRIAN DERING,) JUDGE MICHAEL H. WATSON
 THERESA DERING, ALAN)
 ARMSTRONG, and SANDY)
 ARMSTRONG, individually and on behalf of)
 all others similarly situated,)
)
 Plaintiffs,)
)
 v.)
)
 LEAFFILTER NORTH, LLC,)
)
 Defendant.)
)

**DECLARATION OF SANDRA GARRETT DORSEY IN SUPPORT OF PLAINTIFFS’
MOTION FOR APPROVAL OF ATTORNEYS’ FEES, EXPENSE REIMBURSEMENT,
AND CLASS REPRESENTATIVE SERVICE AWARDS**

Pursuant to 28 U.S.C. Section 1746, I, Sandra GarrettDorsey, declare under penalty of perjury that the foregoing is true and correct:

1. I am an adult competent to testify to the matters herein on the basis of my own personal knowledge of the facts and relevant documents, among other things.
2. I am one of the named Plaintiffs in this class action lawsuit against Defendant LeafFilter North, LLC (“LeafFilter”).
3. I recognize that I have a fiduciary duty to the class members in this case.
4. I have at all times acted in the best interest of the class members and vigorously prosecuted this litigation through my attorneys, Jeffrey S. Goldenberg and Todd B. Naylor of Goldenberg Schneider, LPA, and Janet R. Varnell, Matthew Peterson, and Brian Warwick of Varnell & Warwick.

5. As a class representative, I vigorously prosecuted this action to maximize the recovery for the class members. I have remained in contact with my attorneys in order to fully execute my responsibilities as a class representative. I met with and consulted with my attorneys prior to the filing of this case, reviewed many court filings, including the complaint prior to filing, participated in calls and communications with my attorneys and their staff, responded to the LeafFilter's discovery requests, and reviewed and approved the proposed settlement with my attorneys.

6. Throughout this litigation, I have attempted to regularly communicate with and monitor the performance of my attorneys. I believe my attorneys have fully and vigorously prosecuted this action, on my behalf and on behalf of the class members.

7. In representing the interest of the class members since this case was filed, I have had numerous conferences and communications with one or more of my attorneys and their staff, including numerous discussions related to the terms of my representation agreement, the claims in this action, the progress of the litigation, the risks of the case, and the terms of the proposed settlement.

8. My attorneys agreed to represent me on a fully contingent basis, including advancing all costs and expenses so that they would only be paid and reimbursed for their expenses and costs if they achieved a successful result for the Class.

9. It is my understanding that, according to the settlement, LeafFilter has agreed to pay reasonable attorneys' fees and expense reimbursement and reasonable service awards to the Named Plaintiffs, as approved by the Court.

10. It is also my understanding that according to the settlement, my attorneys and I agreed to request that the Court approve an aggregate award of attorneys' fees and expenses not

to exceed \$1,775,000, and individual service awards to each Named Plaintiff household not to exceed \$3,500 each.

11. I believe the Settlement Agreement is fair, reasonable, and adequate and is in the best interest of the class members, as it provides meaningful benefits to the class members and provides for the payment of a reasonable fee and expense reimbursement to my attorneys.

12. I fully support my attorneys' request for the payment of \$1,775,000 for attorneys' fees and expenses, and for service awards of \$3,500 per Named Plaintiff household. I believe these payments to be fair and reasonable especially given the meaningful settlement achieved and in light of the contingent nature of the representation as well as the risks undertaken during this litigation, including the risk of nonpayment.

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

Nov 3, 2022

Executed on November __, 2022.

Sandra Garrett Dorsey
Sandra GarrettDorsey (Nov 3, 2022 17:21 EDT)

Sandra GarrettDorsey, Class Representative

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES ZILINSKY, GERALDINE) CASE NO. 2:20-cv-6229-MHW-KAJ
 ZILINSKY, CORY SIMPSON, MEAGAN)
 MGINLEY, SANDRA)
 GARRETT DORSEY, BRIAN DERING,) JUDGE MICHAEL H. WATSON
 THERESA DERING, ALAN)
 ARMSTRONG, and SANDY)
 ARMSTRONG, individually and on behalf of)
 all others similarly situated,)
)
 Plaintiffs,)
)
 v.)
)
 LEAFFILTER NORTH, LLC,)
)
 Defendant.)
)

**DECLARATION OF BRIAN DERING IN SUPPORT OF PLAINTIFFS' MOTION FOR
APPROVAL OF ATTORNEYS' FEES, EXPENSE REIMBURSEMENT, AND CLASS
REPRESENTATIVE SERVICE AWARDS**

Pursuant to 28 U.S.C. Section 1746, I, Brian Dering, declare under penalty of perjury that the foregoing is true and correct:

1. I am an adult competent to testify to the matters herein on the basis of my own personal knowledge of the facts and relevant documents, among other things.
2. I am one of the named Plaintiffs in this class action lawsuit against Defendant LeafFilter North, LLC (“LeafFilter”).
3. I recognize that I have a fiduciary duty to the class members in this case.
4. I have at all times acted in the best interest of the class members and vigorously prosecuted this litigation through my attorneys, Jeffrey S. Goldenberg and Todd B. Naylor of Goldenberg Schneider, LPA, and Janet R. Varnell, Matthew Peterson, and Brian Warwick of Varnell & Warwick.

5. As a class representative, I vigorously prosecuted this action to maximize the recovery for the class members. I have remained in contact with my attorneys in order to fully execute my responsibilities as a class representative. I met with and consulted with my attorneys prior to the filing of this case, reviewed many court filings, including the complaint prior to filing, participated in calls and communications with my attorneys and their staff, responded to the LeafFilter's discovery requests, and reviewed and approved the proposed settlement with my attorneys.

6. Throughout this litigation, I have attempted to regularly communicate with and monitor the performance of my attorneys. I believe my attorneys have fully and vigorously prosecuted this action, on my behalf and on behalf of the class members.

7. In representing the interest of the class members since this case was filed, I have had numerous conferences and communications with one or more of my attorneys and their staff, including numerous discussions related to the terms of my representation agreement, the claims in this action, the progress of the litigation, the risks of the case, and the terms of the proposed settlement.

8. My attorneys agreed to represent me on a fully contingent basis, including advancing all costs and expenses so that they would only be paid and reimbursed for their expenses and costs if they achieved a successful result for the Class.

9. It is my understanding that, according to the settlement, LeafFilter has agreed to pay reasonable attorneys' fees and expense reimbursement and reasonable service awards to the Named Plaintiffs, as approved by the Court.

10. It is also my understanding that according to the settlement, my attorneys and I agreed to request that the Court approve an aggregate award of attorneys' fees and expenses not

to exceed \$1,775,000, and individual service awards to each Named Plaintiff household not to exceed \$3,500 each.

11. I believe the Settlement Agreement is fair, reasonable, and adequate and is in the best interest of the class members, as it provides meaningful benefits to the class members and provides for the payment of a reasonable fee and expense reimbursement to my attorneys.

12. I fully support my attorneys' request for the payment of \$1,775,000 for attorneys' fees and expenses, and for service awards of \$3,500 per Named Plaintiff household. I believe these payments to be fair and reasonable especially given the meaningful settlement achieved and in light of the contingent nature of the representation as well as the risks undertaken during this litigation, including the risk of nonpayment.

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

Nov 3, 2022

Executed on November __, 2022.

Brian Dering

Brian Dering (Nov 3, 2022 14:11 EDT)

Brian Dering, Class Representative

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES ZILINSKY, GERALDINE)	CASE NO. 2:20-cv-6229-MHW-KAJ
ZILINSKY, CORY SIMPSON, MEAGAN)	
McGINLEY, SANDRA)	
GARRETTDORSEY, BRIAN DERING,)	JUDGE MICHAEL H. WATSON
THERESA DERING, ALAN)	
ARMSTRONG, and SANDY)	
ARMSTRONG, individually and on behalf of)	
all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	
)	
LEAFFILTER NORTH, LLC,)	
)	
Defendant.)	
)	

**DECLARATION OF THERESA DERING IN SUPPORT OF PLAINTIFFS' MOTION
FOR APPROVAL OF ATTORNEYS' FEES, EXPENSE REIMBURSEMENT, AND
CLASS REPRESENTATIVE SERVICE AWARDS**

Pursuant to 28 U.S.C. Section 1746, I, Theresa Dering, declare under penalty of perjury that the foregoing is true and correct:

1. I am an adult competent to testify to the matters herein on the basis of my own personal knowledge of the facts and relevant documents, among other things.
2. I am one of the named Plaintiffs in this class action lawsuit against Defendant LeafFilter North, LLC ("LeafFilter").
3. I recognize that I have a fiduciary duty to the class members in this case.
4. I have at all times acted in the best interest of the class members and vigorously prosecuted this litigation through my attorneys, Jeffrey S. Goldenberg and Todd B. Naylor of Goldenberg Schneider, LPA, and Janet R. Varnell, Matthew Peterson, and Brian Warwick of Varnell & Warwick.

5. As a class representative, I vigorously prosecuted this action to maximize the recovery for the class members. I have remained in contact with my attorneys in order to fully execute my responsibilities as a class representative. I met with and consulted with my attorneys prior to the filing of this case, reviewed many court filings, including the complaint prior to filing, participated in calls and communications with my attorneys and their staff, responded to the LeafFilter's discovery requests, and reviewed and approved the proposed settlement with my attorneys.

6. Throughout this litigation, I have attempted to regularly communicate with and monitor the performance of my attorneys. I believe my attorneys have fully and vigorously prosecuted this action, on my behalf and on behalf of the class members.

7. In representing the interest of the class members since this case was filed, I have had numerous conferences and communications with one or more of my attorneys and their staff, including numerous discussions related to the terms of my representation agreement, the claims in this action, the progress of the litigation, the risks of the case, and the terms of the proposed settlement.

8. My attorneys agreed to represent me on a fully contingent basis, including advancing all costs and expenses so that they would only be paid and reimbursed for their expenses and costs if they achieved a successful result for the Class.

9. It is my understanding that, according to the settlement, LeafFilter has agreed to pay reasonable attorneys' fees and expense reimbursement and reasonable service awards to the Named Plaintiffs, as approved by the Court.

10. It is also my understanding that according to the settlement, my attorneys and I agreed to request that the Court approve an aggregate award of attorneys' fees and expenses not

to exceed \$1,775,000, and individual service awards to each Named Plaintiff household not to exceed \$3,500 each.

11. I believe the Settlement Agreement is fair, reasonable, and adequate and is in the best interest of the class members, as it provides meaningful benefits to the class members and provides for the payment of a reasonable fee and expense reimbursement to my attorneys.

12. I fully support my attorneys' request for the payment of \$1,775,000 for attorneys' fees and expenses, and for service awards of \$3,500 per Named Plaintiff household. I believe these payments to be fair and reasonable especially given the meaningful settlement achieved and in light of the contingent nature of the representation as well as the risks undertaken during this litigation, including the risk of nonpayment.

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

Nov 3, 2022

Executed on November __, 2022.



Theresa Dering (Nov 3, 2022 13:08 EDT)

Theresa Dering, Class Representative

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES ZILINSKY, GERALDINE) CASE NO. 2:20-cv-6229-MHW-KAJ
 ZILINSKY, CORY SIMPSON, MEAGAN)
 McGINLEY, SANDRA)
 GARRETT DORSEY, BRIAN DERING,) JUDGE MICHAEL H. WATSON
 THERESA DERING, ALAN)
 ARMSTRONG, and SANDY)
 ARMSTRONG, individually and on behalf of)
 all others similarly situated,)
)
 Plaintiffs,)
)
 v.)
)
 LEAFFILTER NORTH, LLC,)
)
 Defendant.)
)

**DECLARATION OF ALAN ARMSTRONG IN SUPPORT OF PLAINTIFFS’
MOTION FOR APPROVAL OF ATTORNEYS’ FEES, EXPENSE
REIMBURSEMENT, AND CLASS REPRESENTATIVE SERVICE AWARDS**

Pursuant to 28 U.S.C. Section 1746, I, Alan Armstrong, declare under penalty of perjury that the foregoing is true and correct:

1. I am an adult competent to testify to the matters herein on the basis of my own personal knowledge of the facts and relevant documents, among other things.
2. I am one of the named Plaintiffs in this class action lawsuit against Defendant LeafFilter North, LLC (“LeafFilter”).
3. I recognize that I have a fiduciary duty to the class members in this case.
4. I have at all times acted in the best interest of the class members and vigorously prosecuted this litigation through my attorneys, Jeffrey S. Goldenberg and Todd B. Naylor of Goldenberg Schneider, LPA, and Janet R. Varnell, Matthew Peterson, and Brian Warwick of Varnell & Warwick.

5. As a class representative, I vigorously prosecuted this action to maximize the recovery for the class members. I have remained in contact with my attorneys in order to fully execute my responsibilities as a class representative. I met with and consulted with my attorneys prior to the filing of this case, carefully reviewed court filings, including the complaint prior to filing, participated in calls and communications with my attorneys and their staff, responded to the LeafFilter's discovery requests, and reviewed and approved the proposed settlement with my attorneys.

6. Throughout this litigation, I have attempted to regularly communicate with and monitor the performance of my attorneys. I believe my attorneys have fully and vigorously prosecuted this action, on my behalf and on behalf of the class members.

7. In representing the interest of the class members since this case was filed, I have had numerous conferences and communications with one or more of my attorneys and their staff, including numerous discussions related to the terms of my representation agreement, the claims in this action, the progress of the litigation, the risks of the case, and the terms of the proposed settlement.

8. My attorneys agreed to represent me on a fully contingent basis, including advancing all costs and expenses so that they would only be paid and reimbursed for their expenses and costs if they achieved a successful result for the Class.

9. It is my understanding that according to the settlement, LeafFilter has agreed to pay reasonable attorneys' fees and expense reimbursement and reasonable service awards to the Named Plaintiffs, as approved by the Court.

10. It is also my understanding that according to the settlement, my attorneys and I agreed to request that the Court approve an aggregate award of attorneys' fees and expenses not

to exceed \$1,775,000, and individual service awards to each Named Plaintiff household not to exceed \$3,500 each.

11. I believe the Settlement Agreement is fair, reasonable, and adequate and is in the best interest of the class members, as it provides meaningful benefits to the class members and provides for the payment of a reasonable fee and expense reimbursement to my attorneys.

12. I fully support my attorneys' request for the payment of \$1,775,000 for attorneys' fees and expenses, and for service awards of \$3,500 per Named Plaintiff household. I believe these payments to be fair and reasonable especially given the meaningful settlement achieved and in light of the contingent nature of the representation as well as the risks undertaken during this litigation, including the risk of nonpayment.

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

Nov 3, 2022

Executed on November __, 2022.

Alan Armstrong

Alan Armstrong (Nov 3, 2022 10:14 PDT)

Alan Armstrong, Class Representative

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES ZILINSKY, GERALDINE) CASE NO. 2:20-cv-6229-MHW-KAJ
 ZILINSKY, CORY SIMPSON, MEAGAN)
 McGINLEY, SANDRA)
 GARRETT DORSEY, BRIAN DERING,) JUDGE MICHAEL H. WATSON
 THERESA DERING, ALAN)
 ARMSTRONG, and SANDY)
 ARMSTRONG, individually and on behalf of)
 all others similarly situated,)
)
 Plaintiffs,)
)
 v.)
)
 LEAFFILTER NORTH, LLC,)
)
 Defendant.)
)

**DECLARATION OF SANDY ARMSTRONG IN SUPPORT OF PLAINTIFFS'
MOTION FOR APPROVAL OF ATTORNEYS' FEES, EXPENSE
REIMBURSEMENT, AND CLASS REPRESENTATIVE SERVICE AWARDS**

Pursuant to 28 U.S.C. Section 1746, I, Sandy Armstrong, declare under penalty of perjury that the foregoing is true and correct:

1. I am an adult competent to testify to the matters herein on the basis of my own personal knowledge of the facts and relevant documents, among other things.
2. I am one of the named Plaintiffs in this class action lawsuit against Defendant LeafFilter North, LLC (“LeafFilter”).
3. I recognize that I have a fiduciary duty to the class members in this case.
4. I have at all times acted in the best interest of the class members and vigorously prosecuted this litigation through my attorneys, Jeffrey S. Goldenberg and Todd B. Naylor of Goldenberg Schneider, LPA, and Janet R. Varnell, Matthew Peterson, and Brian Warwick of Varnell & Warwick.

5. As a class representative, I vigorously prosecuted this action to maximize the recovery for the class members. I have remained in contact with my attorneys in order to fully execute my responsibilities as a class representative. I met with and consulted with my attorneys prior to the filing of this case, carefully reviewed court filings, including the complaint prior to filing, participated in calls and communications with my attorneys and their staff, responded to the LeafFilter's discovery requests, and reviewed and approved the proposed settlement with my attorneys.

6. Throughout this litigation, I have attempted to regularly communicate with and monitor the performance of my attorneys. I believe my attorneys have fully and vigorously prosecuted this action, on my behalf and on behalf of the class members.

7. In representing the interest of the class members since this case was filed, I have had numerous conferences and communications with one or more of my attorneys and their staff, including numerous discussions related to the terms of my representation agreement, the claims in this action, the progress of the litigation, the risks of the case, and the terms of the proposed settlement.

8. My attorneys agreed to represent me on a fully contingent basis, including advancing all costs and expenses so that they would only be paid and reimbursed for their expenses and costs if they achieved a successful result for the Class.

9. It is my understanding that according to the settlement, LeafFilter has agreed to pay reasonable attorneys' fees and expense reimbursement and reasonable service awards to the Named Plaintiffs, as approved by the Court.

10. It is also my understanding that according to the settlement, my attorneys and I agreed to request that the Court approve an aggregate award of attorneys' fees and expenses not

to exceed \$1,775,000 and individual service awards to each Named Plaintiff household not to exceed \$3,500 each.


11. I believe the Settlement Agreement is fair, reasonable, and adequate and is in the best interest of the class members, as it provides meaningful benefits to the class members and provides for the payment of a reasonable fee and expense reimbursement to my attorneys.

12. I fully support my attorneys' request for the payment of \$1,775,000 for attorneys' fees and expenses, and for service awards of \$3,500 per Named Plaintiff household. I believe these payments to be fair and reasonable especially given the meaningful settlement achieved and in light of the contingent nature of the representation as well as the risks undertaken during this litigation, including the risk of nonpayment.

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

Nov 3, 2022

Executed on November __, 2022.



Sandra Armstrong (Nov 3, 2022 09:56 PDT)

Sandy Armstrong, Class Representative