

CAUSE NO. 2020-CI-16240

VIVIAN AREVALO, and MICAH
SIMON, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

USAA CASUALTY INSURANCE
COMPANY, and GARRISON
PROPERTY & CASUALTY
INSURANCE COMPANY,

Defendants.

§ IN THE DISTRICT COURT OF
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§
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§ BEXAR COUNTY, TEXAS
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§
§ 285th JUDICIAL DISTRICT
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§

**PLAINTIFFS' UNOPPOSED MOTION FOR
ATTORNEYS' FEES, COSTS, AND SERVICE AWARDS**

Plaintiffs Vivian Arevalo and Micah Simon, individually and on behalf of the Settlement Class, file this Unopposed Motion for Attorneys' Fees, Costs, and Service Awards. Pursuant to the Class Action Settlement Agreement (the "Agreement" or "Settlement Agreement") between the Parties and the Settlement Class, Defendants United Services Automobile Association ("United Services"), Garrison Property & Casualty Insurance Company ("Garrison"), USAA Casualty Insurance Company ("USAA CIC"), and USAA General Indemnity Company ("USAA GIC") (together, "Defendants" or "USAA") agreed to pay attorneys' fees and costs in an amount up to \$4,079,287.50., and to pay up to \$5,000.00 in service awards to each of the Named Plaintiffs, subject to this Court's approval. This Motion is supported by the Declarations of Edmund Normand, Roger L. Mandel, Scott Edelsberg, Andrew Shamis, Craig E. Rothburd and Casim Adam Neff (Exhs. 1-6).

I. CONCISE STATEMENT OF THE RELIEF SOUGHT AND BASIS FOR REQUEST

As provided by the Settlement Agreement preliminarily approved by this Court, Plaintiffs request that the Court approve attorneys' fees of \$3,948,478.72 and costs of \$130,808.78 for a total fee and cost award of \$4,079,287.50.00, and service awards of \$5,000.00 for each Named Plaintiff.

The requested fees, costs, and service awards were negotiated at arm's length between the Parties only after all other terms of the Settlement were agreed upon. Mandel Dec. at ¶ 6. The fees, costs, and service awards were agreed to by Defendants as part of the Class Action Settlement and are reasonable under both the lodestar and multiplier method (lodestar multiplied by up to 400%) under Tex. R. Civ. P. 42(i), accounting for the factors prescribed by Tex. Disciplinary R. Prof. Conduct Rule 1.04(b), and when analyzed as a percentage of the class recovery. *See* Plaintiffs' Counsel Declarations. Concurrent with the filing of this Motion, notice of this Motion is being

provided to the Settlement Class Members by posting on the Settlement website.

II. FACTUAL BACKGROUND AND SETTLEMENT TERMS.

This case involves allegations that USAA breached automobile insurance policies issued to Plaintiffs and all members of the proposed settlement class by failing to pay or underpaying fees and, for some Class Members, failing to pay or underpaying Sales Tax, which Plaintiffs allege are part of the actual cash value (“ACV”) payments owed to insureds when their vehicles are determined to be total losses.¹ As to leased vehicles, Defendants reviewed lease documents and attempted to ascertain how much Sales Tax, if any, had been paid by the insured as of the date of loss and paid only that amount. Defendants did not pay Sales Tax where insureds chose to keep the totaled vehicles rather than turning them over to Defendants. In approximately September of 2020, Defendants changed these practices and began paying Sales Tax based on the adjusted value of the total loss vehicle as part of the total-loss payment irrespective of whether the vehicles were owned or leased or retained by the insureds. While Plaintiffs believe it to be the case, Defendants deny that their decision to change their Sales Tax payment policy was caused by this litigation.

Plaintiffs contend that Defendants always underpaid Regulatory Fees² during the Class Period, but by different amounts at different times. Specifically, Defendants typically paid a prorated amount of the state registration fees rather than the full state registration fee of \$50.75. While Defendants’ policy was to pay the full title fees and local registration fees, Plaintiffs believe

¹ The factual background set forth here was taken from Plaintiffs’ Motion for Class Certification and Brief in Support, which provides evidentiary support for every factual allegation. Defendants do not agree with the facts as set forth here. *See also* Mandel Dec. at ¶¶ 4-8.

² “Regulatory Fees” are comprised of title fees of \$28.00 or \$33.00 (depending on county) (“Title Fees”), state registration fees of \$50.25, local registration fees of \$10.00-\$33.50 (depending on county), which includes a DPS fee of \$1.00 and a Sure Fee of \$1.00 (state and local registration fees are referred to as “Registration Fees”), a tag fee of either \$2.50 or \$6.00 (“Plate Fee”), a process and handling fee of \$4.75 (“P&H” Fee), and safety inspection and emission testing fees of \$14.50-\$54.25 (depending on county) (“Inspection Fees”).

they did not do so on approximately 12% of total loss claims.³ During most of the Class Period, USAA did not pay Inspection Fees. On December 31, 2021, however, Defendants changed their business practice to begin including Inspection Fees in total loss payments. Similarly, USAA did not pay the \$4.75 P&H fee, but on December 31, 2021, Defendants changed their business practice to begin paying this fee. Defendants have never paid Dealer Fees⁴ or the Temporary Tag Fee.⁵

In summary, USAA has changed its business practices, and it now includes full Sales Tax in all Texas total-loss claim payments, including for leased vehicles and where the insured retains the totaled vehicles. Additionally, USAA now pays fees as follows: prorated state registration fees, full local registration fees (including a DPS fee of \$1.00 and a Sure Fee of \$1.00), full Title Fees, full Inspection Fees, and the P&H Fee. Again, although Defendants deny it, Plaintiffs believe this lawsuit caused USAA to change its policies in this manner, and these changes will result in millions of dollars in additional payments in the coming years.

Plaintiffs allege that the failure to pay full Sales Tax—calculated as the applicable percentage of the underlying total-loss vehicle’s adjusted value—and full Fees constituted a breach of USAA’s form insurance Policy. USAA maintains that its practices and procedures were valid and lawful pursuant to its Policy. During the discovery period and prior to settlement, Plaintiffs deposed five USAA employees (three adjusters who handled Plaintiffs’ claims, one corporate representative on Defendants’ claims handling practices, and one corporate representative on

³ Just as with sales tax, for the majority of the Class Period, Defendants did not pay title fees or local registration fees when the Class member retained the totaled vehicle, and their payment of those fees when an insured leased the totaled vehicle was on a case-by-case basis. And, as with sales tax, Defendants changed their policy around September 2020, and began treating leased vehicles and owner-retained vehicles the same as owned, USAA-retained vehicles for purposes of paying sales tax and fees. Again, Plaintiffs believe this suit caused the change in policy, and Defendants deny it.

⁴ “Dealer Fees,” sometimes referred to as dealer documentary fees, are fees charged by dealers to cover the cost and overhead of handling the paperwork involved in the sale of a vehicle. *See* 7 Tex. Admin. Code § 84.205.

⁵ The “Temporary Tag Fee” is a \$5.00 fee that dealers charge for a temporary (paper) tag fee when they sell a used vehicle.

Defendants' databases and data analysis capabilities), served multiple rounds of discovery requests, secured and analyzed thousands of documents, including spreadsheets containing millions of data inputs, engaged in extensive briefing of a motion to compel appraisal brought by USAA and a motion for class certification brought by Plaintiffs, and retained several expert witnesses, including an insurance industry expert, a data analysis expert, and a damages calculations expert. *See* Mandel Dec. ¶¶ 4-6; Normand Dec. at ¶ 9.

III. ARGUMENT AND CITATION OF AUTHORITY.

A. The Court Should Give Great Weight to the Parties' Agreement.

This Court is not bound by the Parties' agreement, and, indeed, has a duty to independently evaluate the requested fees. Nonetheless, the Settlement Agreement is entitled to great weight because it resulted from adversarial negotiations after the merits of the benefits available to members of the Class were agreed upon. Mandel Decl. at ¶ 6; *see also, e.g., Strube v. Am. Equity Inv. Life Ins. Co.*, 2006 WL 1232816, at *2 (M.D. Fla. May 5, 2006). As one court put it:

The Court finds that the fee and expense negotiations were conducted at arm's length, only after the parties had reached agreement on all terms of the Settlement. There is no evidence in this case that the Settlement, or the fee and expense agreement, was in any way collusive. Under these circumstances, the Court gives great weight to the negotiated fee in considering the fee and expense request.

Such agreements between plaintiffs and defendants in class actions are encouraged, particularly where the attorneys' fees are negotiated separately and only after all terms of the settlement have been agreed to between the parties. *See Hensley v. Eckerhart*, 461 U.S. 424, 437 (1983) (noting that negotiated, agreed upon attorneys' fees are the "ideal" toward which the parties should strive and stating that "[i]deally, of course, litigants will settle the amount of a fee").

Manners v. Am. Gen. Life Ins. Co., 1999 WL 33581944, at *28 (M.D. Tenn. Aug. 11, 1999) (some internal citations omitted); *see also, e.g., Johnson v. Georgia Highway Express, Inc.*, 488 F.2d

714, 720 (5th Cir. 1974) (“In cases of this kind, we encourage counsel on both sides to utilize their best efforts to understandingly, sympathetically, and professionally arrive at a settlement as to attorney's fees.”).

In other words, where the amount for attorneys’ fees and costs is reached by agreement, the focus of a court’s analysis is not on the amount, but on ensuring that whatever amount was agreed to did not result from any collusion between the parties. Absent indication of collusion, the parties’ agreement is afforded significant weight. Because the benefits for the class are already decided and because Class Counsel did not negotiate fees and service awards until agreement had been reached on the class benefits, no danger exists that they traded a lesser total settlement amount in return for agreement from Defendants on higher fees. Indeed, class counsel is incentivized to maximize fees while the defendant can “bargain for lower fees using the risk of delay and the potential conflict of interest which could [arise] if counsel delay[s] settlement for a higher fee.” *Strube*, 2006 WL 1232816, at *6. And here, the agreement was reached under the oversight of a neutral mediator, which dispels any notion of collusive effects. *McLaughlin on Class Actions* § 6:7 (12th ed.) (“A settlement reached after a supervised mediation” strongly suggests there was no collusion); *Johnson v. Scott*, 113 S.W.3d 366, 371 (Tex. App.—Beaumont 2003, pet. denied) (that settlement was achieved only after “weeks of intense negotiation” was evidence of lack of collusion).

B. The Fees are Reasonable Under the Lodestar and Multiplier Method.

1. Legal Principles.

Under Texas law, attorneys’ fees in class actions are analyzed under the lodestar and multiplier method, pursuant to which attorneys may recover their lodestar with a multiplier of up to 4.0. *See* Tex. R. Civ. P. 42(i) (permitting attorneys’ fees in the amount of up to 400% of the

lodestar). In calculating the reasonable lodestar, courts identify the reasonable number of hours expended, multiplied by the reasonable hourly rate. *See, e.g., Dillard Dep't Stores, Inc. v. Gonzales*, 72 S.W.3d 398, 412 (Tex. App.—El Paso 2002, pet. denied); *La. Power & Light Co. v. Kellstrom*, 50 F.3d 319, 323-24 (5th Cir. 1995). Under Rule 42(i), this determination accounts for the factors outlined in Rule 1.04(b), Texas Disciplinary Rules of Professional Conduct. *See El Apple I, Ltd. v. Olivas*, 370 S.W.3d 757, 760 (Tex. 2012). Those factors are:

- (1) the time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal service properly;
- (2) the likelihood, if apparent to the client, that the acceptance of the particular employment will preclude other employment by the lawyer;
- (3) the fee customarily charged in the locality for similar legal services;
- (4) the amount involved and the results obtained;
- (5) the time limitations imposed by the client or by the circumstances;
- (6) the nature and length of the professional relationship with the client;
- (7) the experience, reputation, and ability of the lawyer or lawyers performing the services; and
- (8) whether the fee is fixed or contingent on results obtained or uncertainty of collection before the legal services have been rendered.

Tex. Disciplinary R. Prof. Conduct 1.04(b). As set forth more fully below, each of these factors weighs in favor of approving the requested fees or are neutral. *See Mandel Dec.* at ¶¶ 26-38; *Normand Dec.* at ¶¶ 6-7, 16-17.

After the reasonable lodestar is determined, the court considers whether a multiplier is appropriate. The same factors are potentially relevant—factors that do not impact the reasonableness of the hours expended or the hourly rate should be taken into account when

considering the appropriateness of a multiplier. *See generally Stratton v. XTO Energy Inc.*, 2012 Tex. App. LEXIS 1089, at **8-10 (Tex. App.—Fort Worth, Feb. 9, 2012).

2. The requested fees are reasonable.

The requested fees of \$3,948,478.72 amount equates to approximately 200% of Class Counsel’s lodestar, utilizing a reasonable number of hours times reasonable rates, rates which were approved for many of the timekeepers in recent litigation. See Mandel Dec. ¶¶ 14-24; Normand Decl. at ¶¶ 11-16. This is comfortably within the range courts consistently find reasonable in class litigation. *See generally Stratton v. XTO Energy Inc.*, 2012 Tex. App. LEXIS 1089 (Tex. App.—Fort Worth Feb. 9, 2012, no pet.) (trial court erred by not approving the requested 2.17 multiplier, given evidence submitted and given that a 2.17 multiplier is “not unusual” in complex litigation); *Bower v. MetLife, Inc.*, 2012 U.S. Dist. LEXIS 149117, at *23-24 (S.D. Oh. Oct. 17, 2012) (collecting cases demonstrating that multipliers ranging from 1.75 to 5.0 are considered reasonable in class litigation); *In re NASDAQ Market-Makers Antitrust Litig.*, 187 F.R.D. 465, 489 (S.D.N.Y. 1999) (awarding a 3.97 multiplier and finding fee awards of 3 to 4.5 to be “common”); *Di Giacomo v. Plains All Am. Pipeline*, 2001 U.S. Dist. LEXIS 25532 (S.D. Tex. Dec. 18, 2001) (risk multiplier of 5.3 was reasonable).

Comparing the percentage of the settlement fund that the requested fees represent to the percentages awarded in other cases presents a good proxy for the reasonableness of the fee request under Tex. Disciplinary R. Prof. Conduct Rule 1.04(b). The total settlement value is \$13,597,625.00, Mandel Decl. at ¶ 7, meaning the requested attorneys’ fees constitute less than 30% of the available cash benefits, which is well within the percentage of the settlement fund Texas courts and federal courts have deemed reasonable in class action litigation. *See, e.g., Tricon Ins. Servs. v. Dallas Cowboys Football Club, Ltd.*, 2004 Tex. App. LEXIS 7342 (Tex. App.—

Dallas Aug. 16, 2004, no pet.) (35 1/2% of settlement benefits was a reasonable amount for attorneys' fees and expenses); *Crouch v. Tenneco, Inc.*, 853 S.W.2d 643, 646 (Tex. App.--Waco 1993, writ denied) (fees constituting 33 1/3% of settlement benefits was reasonable); *Blackmon v. Zachary Holdings, Inc.*, 2022 U.S. Dist. LEXIS 129336, at *13 (W.D. Tex. Jul. 21, 2022) (approving fees of 33 1/3% and noting that "[w]hen the percentage method is used, fee awards commonly fall between 20% and 50% of the overall settlement award.").

C. The Amount Sought by Class Counsel is Justified.

All of the relevant factors support the requested attorneys' fees and costs amount—the hours expended are eminently reasonable given the complexity and time-intensive nature of this action, and were lower than would otherwise be expected because Class Counsel's extensive experience in this area of the law allowed them to efficiently and expeditiously litigate this case, the hourly rates are consistent with the marketplace and have been routinely approved as such, and the modest multiplier is eminently reasonable for this type of complex class litigation.

1. The time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal service supported the requested fee amount.

Substantial time and labor were required to investigate and litigate these cases: Class Counsel invested over 2,404 hours as of July 31, 2023, and expect to expend approximately 150 more hours through finalization of this case and payment to Class Members. Mandel Decl. at ¶¶ 16-24; Normand Decl. at ¶¶ 13-14 and Ex. B thereto. During the discovery period and prior to settlement, Plaintiffs deposed five USAA employees (three adjusters who handled Plaintiffs' claims, one corporate representative on Defendants' claims handling practices, and one corporate representative on Defendants' databases and data analysis capabilities), served multiple rounds of discovery requests, secured and analyzed thousands of documents, including spreadsheets

containing millions of data inputs, engaged in extensive briefing of a motion to compel appraisal brought by USAA and a motion for class certification brought by Plaintiffs, and retained several expert witnesses, including an insurance industry expert and a data analysis expert. See Mandel Dec. ¶¶ 4-5. The mediation process was also complex and time-consuming, and Class Counsel successfully negotiated very favorable notice provisions that ensured fair notice to Class Members and an extremely simple claims process. *Id.* at ¶¶ 6-8. The hours expended here were, thus, eminently reasonable—indeed, they were far less than the hours expended in similar class litigation. *Stratton*, 2012 Tex. App. LEXIS 1089 (expending over 7,300 hours was reasonable in class litigation); *Thompson v. State Farm Fire & Cas. Co.*, 2019 U.S. Dist. LEXIS 6137, at *28-29 ((M.D. Ga. Jan. 14, 2019) (over 10,000 hours were reasonable). And Class Counsel expended billing judgment, eliminating, or cutting hours that were arguably duplicative or unnecessary. Normand Decl. at ¶ 13; Mandel Decl. at ¶¶ 17, 22-23; Edelsberg Decl. at ¶ 10; Shamis Decl. at ¶ 10. As such, the time and labor required support the reasonableness of the hours expended.

Next, the required skill requisite supports the reasonableness of the hourly rates utilized. This case was complicated, data intensive, and full of potential pitfalls, all addressing an issue of first impression in Texas state courts. The only case addressing Texas law prior to this case held that actual cash value does not include taxes and fees. *See Singleton v. Elephant Ins. Co.*, 953 F.3d 334 (5th Cir. 2020). In a similar case in Florida, the court explained that the case was “a complex class action, involving novel areas of law, and was heavily litigated” and consequently “a skilled set of litigators was required.” *Sos v. State Farm Mut. Auto. Ins. Co.*, No: 6:17-cv-890-Orl-40LRH, 2021 U.S. Dist. LEXIS 15412 (M.D. Fla. Jan. 26, 2021) *report and recommendation adopted by* 2021 U.S. Dist. LEXIS 52898 (M.D. Fla. Mar. 19, 2021). The same is true here. As such, this factor supports the reasonableness of the hourly rates utilized. *Stratton*, 2012 Tex. App.

LEXIS 1089 (holding that hourly rates of \$795.00 were reasonable in 2012 for complex class litigation).

Finally, the novelty and difficulty of the questions involved support application of the modest 2.0 multiplier. The novelty and difficulty of a case increases its risk, meaning the attorneys have an increased risk of recovering nothing—and such risk the most important factor to application of a multiplier. *See Sos*, 2021 U.S. Dist. LEXIS 15412, at *40 (finding that the “novelty and complexity” of a total loss case claiming ACV includes taxes and fees supported a 2.5 multiplier); *Stratton*, 2012 Tex. App. LEXIS 1089 (agreeing that “the magnitude, complexity and novelty of the issues presented in this litigation favor a substantial risk multiplier” and reversing trial court for not applying the requested 2.17 multiplier).

As such, this factor supports the requested attorneys’ fees and costs amount.

2. Preclusion of Other Employment.

Given the substantial time commitment—Class Counsel expended over 2,404 hours litigating this case (*see* Mandel Decl. at ¶¶ 16-24; Normand Decl. at ¶¶ 13-14 and Ex. B thereto)—each Class Counsel firm forewent other fee and profit-generating opportunities in pursuit of this case. Expending over 2,000 hours necessarily means those 2,000 hours could not be spent on other cases. *Stratton*, 2012 Tex. App. LEXIS 1089 (the necessity of expending numerous hours on class litigation means this factor supports the requested fees); *Sos*, 2021 U.S. Dist. LEXIS 15412, at *19 (“[L]itigating a complex class action will necessarily result in the preclusion of other employment to some extent.”); *see* Normand Decl. at ¶ 5; Mandel Decl. at ¶ 10.

3. Customary Fee.

As set forth above, the multiplier sought—and the percentage of the recovery—are both comfortably within the customary range for class litigation. *Stratton*, 2012 Tex. App. LEXIS 1089;

Bower, 2012 U.S. Dist. LEXIS 149117, at *23-24; *In re NASDAQ*, 187 F.R.D. at 489; *Di Giacomo*, 2001 U.S. Dist. LEXIS 25532; *Tricon Ins. Servs.*, 2004 Tex. App. LEXIS 7342; *Crouch*, 853 S.W.2d at 646; *Blackmon*, 2022 U.S. Dist. LEXIS 129336, at *13. Moreover, the hourly rates utilized are reasonable given the marketplace and given the nature of this complex class litigation. *Stratton*, 2012 Tex. App. LEXIS 1089 (finding \$795.00 to be a reasonable rate in 2012 and noting that the customary rates can either be based on the local marketplace or in the locality in which the timekeeper is located); *Sos*, 2021 U.S. Dist. LEXIS 52898, at *7 (“Put simply, in complex consumer class actions, the ‘market rate’ derives less from an attorney’s physical location than from her actual competitors—wherever they may be.”). Each attorney’s declaration avers that the rates sought are the timekeeper’s customary rates and, in some cases, that have recently been approved as reasonable by courts, and are supported by Mr. Normand and Mr. Mandel, both of whom have litigated complex and class actions for decades and are well qualified to opine on the reasonableness of the hourly rates. Normand Decl. at ¶¶ 4-7, 14-15; Mandel Decl. at ¶¶ 9, 19-20, 22-25. As such, this factor counsels in favor of approving the requested fee amount.

4. The Amount Involved and Results Obtained.

Class Counsel secured excellent results for the Class under difficult circumstances. Class Members who submit a claim and were not previously paid sales tax will recover 100% of the sales tax they are owed and could potentially recover at trial. All Class members will receive \$62.50 in fees. Each Class member’s recovery will be reduced by their proportionate share of attorneys’ fees and costs as is standard in class actions and, indeed, in all contingent fee cases. As outlined above, the amount of cash available to make these payments is over \$13 million. Moreover, thus far there has not been a *single* objection lodged by any class member. This factor supports the requested fee.

5. Time Limitations Imposed by Client.

Class Counsel believe this factor is neutral. The time limitations were inherent to complex class litigation—not an external pressure placed upon Class Counsel by Plaintiffs.

6. Nature of Relationship with Client.

This factor supports the requested attorneys' fees in that it supports the reasonableness of the hourly rates. If an attorney has an ongoing relationship with the client and will be able to procure additional work in the future from that client, such factor may militate in favor of a reduced hourly rate. Here, however, Class Counsel had no preexisting relationship with Plaintiffs and there is little to no chance that Plaintiffs will be able to provide Class Counsel with additional employment opportunities in the future. As such, this factor supports the hourly rates utilized and, as such, the requested amount of attorneys' fees. *See Sos*, 2021 U.S. Dist. LEXIS 15412, at *20 (“The nature of the relationship between Mr. Sos and his attorneys also weighs in favor of a highly hourly rate - this is not a situation where Mr. Sos was a long-standing client who simply called up his attorneys and referred another matter to them”) (citing *George v. GTE Directories Corp.*, 114 F. Supp. 2d 1281, 1288 (M.D. Fla. 2000) (“[T]he reduced rate which attorneys generally award to regular and ongoing clients is clearly not applicable in this case.”)); *Stratton*, 2012 Tex. App. LEXIS 1089 (“Unlike hourly billing attorneys, there was little likelihood that Plaintiffs' counsel would be retained on an hourly basis by members of the plaintiff class based on their representation of the class in a class action.”).

7. The Experience, Reputation, and Abilities of the Lawyers.

As set forth in the declarations and firm resumes attached thereto, Class Counsel collectively possess considerable experience, skill, and reputation in complex and class litigation, which supports the fee requested here. And the excellent results demonstrate that the experience

and abilities of the lawyers were employed to the Class's benefit. *See Stratton*, 2012 Tex. App. LEXIS 1089 (observing that "the favorable settlement 'evidences the superior quality of [the attorneys'] work.>"). This factor favors the requested fee.

8. Whether Fee is Fixed or Contingent.

This action was prosecuted entirely on a contingent fee basis. Normand Decl. at ¶ 17; Mandel Decl. at ¶ 38. If Plaintiffs had been unsuccessful, Class Counsel would receive nothing and would have suffered significant out-of-pocket loss of all expenses given they advanced all litigation expenses. *Id.* Numerous courts have recognized that such risk deserves extra compensation and is a critical factor in determining the reasonableness of a fee. *See, e.g., In re Dun & Bradstreet Credit Svcs. Cons. Lit.*, 130 F.R.D. 366, 373 (S.D. Ohio 1990); *Behrens v. Wometco Enterprises, Inc.*, 118 F.R.D. 534, 548 (S.D. Fla. 1988), *aff'd*, 889 F.2d 21 (11th Cir. 1990); *In re Cont. Ill, Sec. Lit.*, 962 F.2d 566, 569 (7th Cir. 1992). Indeed, "Texas courts consistently allow the use of a multiplier based upon the contingent nature" of a fee agreement. *Stratton*, 2012 Tex. App. LEXIS 1089 (citing *Toshiba Mach. Co., Am. v. SPM Flow Control, Inc.*, 180 S.W.3d 761, 783 (Tex. App.—Fort Worth 2005, pet. granted, judgm't vacated w.r.m.); *Dillard Dept Stores*, 72 S.W.3d at 412; *Guity*, 54 S.W.3d at 529; *Borg-Warner Protective Servs. v. Flores*, 955 S.W.2d 861, 870 (Tex. App.—Corpus Christi 1997, no pet.); *Crouch v. Tenneco, Inc.*, 853 S.W.2d 643, 648 (Tex. App.—Waco 1993, writ denied)).

Obviously, no rational attorney would accept a case on a contingency basis absent the possibility—indeed, the likelihood—that a multiplier would be applied to the hourly rate upon success. Normand Decl. at ¶ 17; Mandel Decl. at ¶ 39. Otherwise, the attorney would receive nothing if unsuccessful, and would receive his or her hourly rate *only if successful*. This would be economically irrational. And as one Texas court agreed:

There is a recognition of an additional value for the services performed in exchange for running the risk that there will be no recovery at all.” Increasing the lodestar for contingent work, is “about trying to attract quality lawyers to work in this field and assure that their risk is carefully accounted for. The straight lodestar does not account for the risk or the evaluation of the economic value of the lawyer taking on the risk of not being paid at all.

Stratton, 2012 Tex. App. LEXIS 1089 (cleaned up). And here, the risk was significant. As previously explained, prior to the filing of this case, the only court to address the question under Texas law held that ACV does not include taxes and fees. *Singleton*, 953 F.3d 334.

As such, the contingent nature of the fee arrangement strongly militates in favor of approving the requested (modest) multiplier.

D. The Court Should Approve the Requested Costs.

Class Counsel seeks approval of \$130,808.78 in costs and expenses. Class Counsel has reasonably expended over \$130,808.78 litigation costs and expenses to date. *See* Normand Decl. at ¶ 18; Mandel Decl. at ¶ 24. These costs, which were necessary and reasonable costs expended for, inter alia, securing expert testimony, paying for deposition transcripts, mediation expenses, reasonable travel expenses, and so forth, will come off the top of the total requested fees and costs of \$4,079,287.50 which Defendants have agreed to pay if approved by the Court. It is customary for Class Counsel to recover their reasonable out-of-pocket expenses as part of class settlements. *See, e.g., In re Cardizem CD Antitrust Litig.*, 218 F.R.D. 508, 534 (E.D. Mich. 2003) (“[C]lass counsel is entitled to reimbursement of all reasonable out-of-pocket litigation expenses and costs in the prosecution of claims and in obtaining settlement” and observing that “[e]xpense awards are customary when litigants have created a common settlement fund for the benefit of a class”) (quotation omitted).

E. The Court Should Approve the Requested Service Awards.

The Settlement Agreement also provides that Plaintiffs may make an application for Service Awards up to \$5,000.00 to each Named Plaintiff. Under Texas law, service awards in class actions are appropriate as compensation for the fact that class representatives expend greater time and effort than absent class members litigating the case and confer a benefit on those absent class members. *See generally Morris v. Thibodeau*, 2001 Tex. App. LEXIS 7585 (Tex. App.—Dallas, Nov. 9, 2001) (affirming \$10,000.00 service award and noting that this is consistent with the fact that “federal courts routinely approve incentive awards to compensate named plaintiffs for the services they provided and the risks they incurred during the course of the class action litigation”). The awards Plaintiffs seek constitute slightly more than 0.003% of the total settlement, which is far less than the amount customarily approved by courts throughout the country. *See, e.g., Devine v. Northeast Treatment Ctrs.*, No. 20-02417, 2021 U.S. Dist. LEXIS 197924, at *25 (E.D. Pa. Oct. 14, 2021) (approving service award of 3% of settlement value and collecting cases approving awards of 3%-3.75%).

Here, each Plaintiff provided deposition testimony, produced numerous documents, actively participated in the litigation including periodic updates from counsel and review of court filings, provided input in negotiating the terms of the Settlement for Class Members, insisted on favorable terms, and otherwise significantly advanced the litigation and the interests of the Class Members. *See Normand Decl.* at ¶ 19.

Plaintiffs respectfully submit this Court should approve Service Awards of \$5,000.00 to Plaintiff Arevalo and Plaintiff Simon.

CONCLUSION

Plaintiffs and Class Counsel respectfully request that the Court grant Plaintiffs’ unopposed Motion for Attorneys’ Fees, Costs, and Service Awards, and direct that USAA pay to Class

Counsel and the Named Plaintiffs \$4,079,287.50.00 in attorneys' fees and costs and \$5,000.00 as Service Awards to each of the Named Plaintiffs.

Dated: August 11, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this first day of August 11, 2023, I electronically filed a true and exact copy of the foregoing document, which will send notification of such filing to all attorneys of record, and served unredacted copies via e-mail to the Court and opposing counsel pursuant to Court order.

/s/ Andrew Shamis
Andrew Shamis

Attorney for Plaintiffs

EXHIBIT 1

CASE BACKGROUND AND SETTLEMENT TERMS

4. Plaintiffs originally filed this action on August 26, 2020. Prior to that, beginning in approximately April of 2023, Class Counsel, and associated Plaintiff's counsel, (collectively "Class Counsel") began vetting potential class representatives, including conducting extensive interviews and gathering the documentation relevant to their claims. Prior to filing the Petition, Class Counsel conducted extensive legal research regarding the policy interpretation issues that would be critical to the outcome of the case and regarding the Texas Insurance Code causes of action and regarding Texas law on appraisal. Class Counsel then spent numerous hours drafting and revising the Petition.

5. The Settlement Agreement was not signed until April 12, 2023. In between the filing of the Petition on August 26, 2020, and that date, the litigation was hotly contested. During the discovery period and afterward, but prior to the commencement of settlement negotiations, Plaintiffs and Class Counsel served multiple rounds of written discovery requests, secured and analyzed thousands of documents produced by Defendants, including spreadsheets containing millions of data inputs, responded to written discovery requests and produced documents, gave the depositions of Plaintiffs, deposed five employees of Defendants (three adjusters who handled Plaintiffs' claims, one corporate representative on Defendants' claims handling practices, and one corporate representative on Defendants' databases and data analysis capabilities), retained several expert witnesses, including an insurance industry expert, a data analysis expert and a damages calculations experts, produced a report/declaration from the damages calculations expert in support of class certification and proffered him for deposition, took the deposition of Defendants' counter-expert on damages calculations, amended the Petition twice, engaged in extensive briefing of a

motion to compel appraisal brought by Defendants, which the Court decided in favor of Plaintiffs, and engaged in extensive briefing of a motion for class certification brought by Plaintiffs.

6. Settlement negotiations only began on November 3, 2022, in front of highly respected and experienced mediator Rodney Max. The negotiations were completely arm's length, non-collusive, and highly contentious. Indeed, it took another six weeks of negotiations, including another formal mediation session with Mr. Max on December 3, 2022, and ongoing communications through Mr. Max, plus an extensive review of data by both sides, before an agreement in principle was reached. Class Counsel did not negotiate regarding their fees and expenses and class representative service awards until after the benefits to the Settlement Class had been agreed upon. After that, it took almost another four months to negotiate the details of the notice plan and the notice forms and draft and execute the formal Settlement Agreement.

7. The Settlement provides cash benefits of up to \$13,597,625.00 for Settlement Class members who make valid claims, which constitutes (i) payment of regulatory fees, title fees, transfer fees, inspection fees, and dealer fees ("Fees") in the amount of \$62.50; and (ii) if USAA did not pay Sales Tax or paid Sales Tax of less than 6.25% of the adjusted vehicle value as part of its payment of the original total-loss claim, payment of Sales Tax in the amount of 6.25% of the adjusted vehicle value as calculated during the original total-loss payment, less the amount of Sales Tax (if any) originally included in the total-loss claim payment; and (iii) if the Class Member possessed Car Replacement Assistance (CRA) coverage, payment of an additional 20% of the Sales Tax amount, less the amount of CRA Sales Tax (if any) originally included in the total-loss claim payment.

8. For example, consider four different hypothetical claims where the underlying adjusted vehicle value is \$10,000.00: (i) USAA paid \$0.00 in Sales Tax and the insured did not

have CRA coverage; (ii) USAA paid \$0.00 in Sales Tax and the insured possessed CRA coverage; (iii) USAA paid \$200.00 in Sales Tax and the insured did not possess CRA coverage; (iv) USAA paid \$625.00 in Sales Tax and the insured did not possess CRA coverage. The first claimant would receive \$687.50, the second claimant would receive \$812.50, the third claimant would receive \$487.50, and the fourth claimant would receive \$62.50. All these amounts are for illustration only and would have deducted from them the claimant's proportionate share of Class Counsel's Fees and Costs and the Class Representatives' Service Awards.

EXPERIENCE AND QUALIFICATIONS

9. I have been practicing complex commercial litigation for over 36 years, including 31 years bringing class actions on behalf of injured individuals and companies. During that time, I have worked on approximately 39 class actions cases which have settled or gone to verdict, including this one, the highlights of which are listed in my C.V. attached hereto as Exhibit A. In those cases, and many more, I have briefed and argued motions to dismiss, class certification motions and summary judgment motions, interlocutory appeals of class certification and appeals of decisions on the merits. I successfully tried one class action to the jury. I also authored, worked on and/or reviewed fee applications in not only the approximately 39 settled class action cases referenced in my C.V., but also many fee applications in very large MDL's where I was not co-lead counsel involving scores of plaintiffs' firms including almost all the top plaintiffs' class action firms in the country. Those applications also included expenses, which I reviewed for their necessity and reasonableness.

10. In all those cases, I exercised billing judgment in cutting unnecessary, duplicative and/or excessive time billed for tasks performed by the attorneys and staff in my law firm at the time, and in a number of cases, I also did so as to the time billed by other firms in the exercise of

my role as co-lead counsel. I have also reviewed and exercised billing judgment on literally thousands of bills for individual clients paying on an hourly basis. The work that I did on this litigation displaced other work that I would have worked on but for this action that was either hourly or was contingent but less speculative.

11. In the last 31 years, I have read literally hundreds of decisions in class action cases addressing settlement and the award of attorneys' fees. I have done so as part of a conscious attempt to stay abreast of the law in this area. I have also read significant amounts of empirical research on class action settlements and attorneys' fees awards, including multiple surveys and articles covering the 2015 to 2021 time period, which I specifically read again in connection with this declaration.

12. Based upon the foregoing, I have very significant experience in evaluating the amounts of time that the tasks necessary to successfully prosecute a class action should take and the cutting of time in the exercise of billing judgment. I likewise have very significant experience with and knowledge of reasonable hourly rates for prosecuting complex class actions during the time period this case has been litigated, both in Texas and nationally. I also have extensive experience with the types and amounts of expenses, including expert fees, necessary to successfully prosecute complex class actions. I also have extensive experience with and knowledge of the percentages of common funds courts award in connection with class action settlements. I believe based upon the foregoing that I would qualify as an expert on the reasonableness of attorneys' fees and expenses incurred in connection with the successful prosecution of class actions to settlement.

13. My partner Scott R. Jeeves has been practicing law since 1991 and has extensive experience over many years successfully prosecuting class actions as set forth in his resume attached hereto as Exhibit B.

OPINIONS

14. As set forth below, out of the \$4,079,287.50 Fee and Cost Award agreed to by Defendants which Class Counsel requests the Court to award them, they request the Court to award \$130,808.78 in reimbursement of reasonable out of pocket expenses and \$3,948,478.72 in attorneys' fees. Based on the criteria set forth in Tex. R. Civ. P. 42(i) and Tex. Disciplinary R. Prof Conduct 1.04(b), it is my opinion that \$3,948,478.72 represents a reasonable attorney's fee which the Court should award to Class Counsel, as explained in detail below.

15. I was the partner in charge of, performed or supervised and have personal knowledge of all the work performed in this case by JMLG. The time entries of the attorneys and staff were recorded contemporaneously with the work and entered into the firms' billing software, which software produced the entries I later reviewed. I also have personal knowledge of, through directing, consulting about and seeing the results of, all the work performed by Craig E. Rothburd, P.A. ("CERPA") and Neff Insurance Law, PLLC ("NILP"). In addition, I have reviewed the Rothburd Declaration and the Neff Declaration, and the time summaries attached thereto.

16. As of July 31, 2023, JMLG had performed 783.4 hours of work in this matter, which resulted in a lodestar of \$682,063.00. The time entries documenting this time and a timekeeper summary are attached hereto as Exhibit C. I note that the time summarized in Exhibit C does not include the time spent by JMLG researching issues related to legal fees, preparing the time entries and cost statement, preparing the fee application, preparing this declaration, and preparing the other supporting fee declarations. It also only includes paralegal time spent performing substantive

legal issues under my direct supervision by a paralegal who has been working in the field since 1998.

17. Having gone through time entry by time entry in numerous other cases (including hourly cases, individual contingency cases and class action cases) to reduce the number of hours in the exercise of billing judgment, such reductions have on average amounted to approximately 10% of the entered hours, including in complex class actions like this one. Based on my experience, therefore, rather than going through the thousands of time entries in this case and applying billing judgment to them individually, I believe that taking a flat 10% reduction in the lodestar represents an efficient yet still reasonable exercise of billing judgment.

18. Application of the 10% flat business judgment reduction reduces JMLG's hours to 705 and reduces its lodestar \$613,856.70. Based on my experience in handling many class action settlements, I estimate that Mr. Jeeves and I will spend another 100 hours working on this case between August 1, 2003, and its termination, including the finalizing of the notice program, responding to issues that come up during the notice period, responding to class member inquiries, communicating with Defendants and the settlement administrator regarding problematic class member claims, reviewing and communicating with Defendants and the settlement administrator regarding the calculations of the amounts payable on approved claims, dealing with issues related to class member payments, preparing the motion for final approval and participating in the final approval hearing. This assumes no objections to the settlement are received and that no appeal is taken. If either or both these things occur, the additional time required will be far greater. This results in a total number of hours for JMLG of 805 hours and a total lodestar of \$708,856.70.

19. Based on my experience in working on class actions and with preparing and reviewing fee applications and my knowledge of the work performed by JMLG in this case and

my review of the time entries attached as Exhibit A, it is my opinion that 805 hours, after the exercise of billing judgment, represents a reasonable, usual, and customary amount of hours for the work performed by JMLG in this case. Mr. Jeeves and I billed \$950 per hour for our time spent on this case. Based on my knowledge of the billing rates of senior partners in complex class action cases nationally and in Texas gained from both my personal experience litigating class actions and my extensive research regarding the subject, it is my opinion that \$950 per hour is a reasonable rate for us both.

20. I note that in 2020 a rate of \$850 per hour was approved for me by the United States District Court for the Southern District of New York and that just this year the rate of \$950 per hour was approved for both Mr. Jeeves and me by the United States District Court for the Southern District of Florida. I further note that in *Stratton v. XTO Energy Inc.*, 2012 Tex. App. LEXIS 1089 (Tex. App.—Fort Worth Feb. 9, 2012, no pet.), back in 2012, the court approved partner rates of \$795.00 per hour. Based on my experience and research, \$295.00 per hour for junior associate Kyle Woodford and \$175.00 per hour for experienced senior paralegal Kay Hill are also reasonable, usual, and customary rates in Texas and nationally for work in complex class actions. Since a reasonable lodestar is calculated by multiplying a reasonable number of hours by reasonable hourly rates, it is my opinion that a reasonable lodestar for JMLG in this matter is \$708,856.70,

21. As set forth in the statement attached hereto as Exhibit D, JMLG incurred \$85,682.24 in net out of pocket expenses in this case, accounting for reimbursements from other Class Counsel. This statement was prepared using information obtained from the billing software of JMLG into which expenses and payments were entered as they were paid and received. Based on my personal experience litigating class actions and in reviewing cost applications and my

personal knowledge of all the expenditures, it is my opinion that the \$85,682.24 was reasonably and necessarily expended by JMLG.

22. Per the Rothburd Declaration, through August 5, 2023, CERPA expended 70.3 hours working on this case reduced by 6.1 hours to 55.2 hours in the exercise of billing judgment, resulting in a lodestar of \$50,940.00. I note that the time summarized in Exhibit B to the Rothburd Declaration does not include any time spent researching issues related to legal fees, preparing the time entries, preparing the fee application, or preparing his declaration. I also note that it does not include any paralegal time. Based on my personal knowledge of the work performed by CERPA and my review of the time entries attached to the Rothburd Declaration as Exhibit B, and my experience set forth above, it is my opinion that 55.2 hours is a usual, customary, and reasonable number of hours for the work performed by CERPA in this case. Mr. Rothburd is an experienced complex business and class action litigator with over 28 years of experience. Based on my research and experience, as set forth above, \$950.00 per hour is a usual, customary, and reasonable rate for Mr. Rothburd. Likewise, it is my opinion that \$450.000 per hour is a usual, customary, and reasonable rate for associate attorney Dylan Thatcher. Thus, it is my opinion that a reasonable lodestar for CERPA in this case is \$50,940.00.

23. Per the Neff Declaration, through August 7, 2023, plus 10 hours of projected future time, NILP expended 113.3 hours working on this case reduced by 11.3 hours to 102 hours in the exercise of billing judgment resulting in a lodestar of \$45,900.00. I note that the time summarized in Exhibit B to the Neff Declaration does not include any time spent researching issues related to legal fees, preparing the time entries, preparing the fee application, or preparing his declaration. I also note that it does not include any paralegal time Based on my personal knowledge of the work performed by NILP and my review of the time entries attached to the Rothburd Declaration as

Exhibit B, and my experience set forth above, it is my opinion that 102 hours is a usual, customary, and reasonable number of hours for the work performed by NILP in this case. Mr. Neff is an experienced first party insurance coverage lawyer with a few years of experience working on class actions just like this one. Based on my research and experience, as set forth above, \$450.00 per hour is a usual, customary, and reasonable rate for Mr. Neff. Thus, it is my opinion that a reasonable lodestar for CERPA in this case is \$45,900.00.

24. It is my understanding that Edmund Normand, Andrew Shamis, and Scott Edelsberg, my co-Class Counsel, are supplying declarations documenting their firms' reasonable lodestars and out of pocket expenses in further support of Class Counsel's requested Fee and Cost Award. It is my understanding that their firms' lodestar, including those previously expended and those reasonably expected to be expended to bring this case to conclusion, total \$1,161,145.38. When combined with the 962 total hours of JMLG, CERPA, and NILP, combined with the projected hours Counsel reasonably estimate they will expend in the future, the total lodestar is \$1,966,842.08. It is my understanding that the other firms have reasonably incurred out of pocket expenses of \$45,126.54, which, when combined with the \$85,682.24 reasonably incurred by JMLG, makes the cost reimbursement requested by Class Counsel total \$130,808.78. Accordingly, that means Class Counsel request the Court to award them \$3,948,478.72 in attorneys' fees.

25. Tex. R. Civ. P. 42(i) requires the Court to determine Class Counsel's fees by first determining a lodestar figure by multiplying the number of hours reasonably worked times reasonable hourly rates. Based upon the declarations of the six firms who worked on this case, the Court should find that \$1,966,842.08 represents the reasonable lodestar for Class Counsel. Based on my experience in litigating complex class actions and in preparing and reviewing class action fee petitions, my personal knowledge of all the work performed by Class Counsel in this case, the

terms of the Settlement achieved, and the factors set forth in Tex. Disciplinary R. Prof Conduct 1.04(b), it is my opinion that \$1,966,842.08 is a reasonable lodestar for Class Counsel in this matter, as every factor set forth in the Rule either supports that amount or is not applicable..

26. Tex. R. Civ. P. 42(i) next states that the attorney fees award must be in the range of 25% to 400% of the lodestar figure. The requested fee of \$3,948,478.72 represents slightly under (by \$14,794.56) 200% of Class Counsel's lodestar, for a multiplier of 2.0. Based on my experience in litigating complex class actions and in preparing and reviewing class action fee petitions, my personal knowledge of all the work performed by Class Counsel in this case, the terms of the Settlement achieved, and the factors set forth in Tex. Disciplinary R. Prof Conduct 1.04(b), it is my opinion that \$3,948,478.72 is an eminently reasonable fee for Class Counsel in this matter, as every factor set forth in the Rule either supports that amount or is not applicable.

27. In my opinion, the first Rule 1.04(b) factor strongly supports the requested fee award: the time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal services properly. As set forth above, Class Counsel had to expend a very large amount of time and labor to achieve the Settlement. That expenditure is reflective of the novelty and difficulty of the issues involved. Initially, Class Counsel had to overcome an argument by Defendants that Plaintiffs' claims should be sent to appraisal, which would have resulted in dismissal of the case. This presented difficult issues of whether Plaintiffs' claims presented purely legal questions of coverage which must be decided by courts, not appraisers, or presented a factual question suitable for decision by appraisers regarding whether Defendants had paid enough money to Plaintiffs. Notably, several courts in Florida had sent claims like Plaintiffs' to appraisal and no Texas courts had addressed the issue as to claims like Plaintiffs'.

28. On the merits, only one court had addressed whether taxes and fees are covered items on total losses in Texas, and it decided the issue in the insurance company's favor. *See Singleton v. Elephant Ins. Co.*, 953 F.3d 334 (5th Cir. 2020). Cases from other jurisdictions were split. No Texas state court had addressed the issue. Accordingly, the merits questions presented were both novel and very difficult.

29. Class certification also presented many difficult issues and was hotly contested. Defendants contended that damages could not be computed by simply determining the unpaid or underpaid Sales Tax and Fees, but rather that each Class member would have to prove that they received less than the full actual cash value of their totaled vehicles, which would require consideration of the vehicles' values as well and present highly individualized determinations, preventing certification. A few courts in other jurisdictions had denied certification in total loss cases on this basis. It is no coincidence that only after Class Counsel had fully briefed class certification and demonstrated they were likely to overcome this argument that Defendants entered into settlement negotiations.

30. The skill required to overcome these difficult obstacles was very high and could not have been accomplished by lawyers who were not extremely skilled and experienced in both pursuing class actions and in briefing and arguing the appraisal and merits issues. In a similar case in Florida, the court explained that the case was "a complex class action, involving novel areas of law, and was heavily litigated" and consequently "a skilled set of litigators was required." *Sos v. State Farm Mut. Auto. Ins. Co.*, No: 6:17-cv-890-Orl-40LRH, 2021 U.S. Dist. LEXIS 15412 (M.D. Fla. Jan. 26, 2021) *report and recommendation adopted*, 2021 U.S. Dist. LEXIS 52898 (M.D. Fla. Mar. 19, 2021).

31. In my opinion, the second factor--the likelihood, if apparent to the client, that the acceptance of the particular employment will preclude other employment—either supports the requested fee award or is not applicable. Of course, Class Counsel could have spent the over 2,400 hours they expended working on this case on hourly work or less risky contingent work. However, it is not clear whether that was apparent to the Plaintiffs/Class Representatives.

32. In my opinion, the third factor—the fee customarily charged in the locality for similar legal services--strongly supports the requested fee awards. As set forth above, the hourly rates charged by Class Counsel are usual, customary, and reasonable for plaintiff's counsel in complex class actions in Texas and nationally. I also note that fee surveys by the Texas Lawyer and other entities show that the very large national firms which defend class actions in Texas and nationally, like defense counsel in this case, routinely charge hourly rates for complex and class litigation as high or higher than those charged by Class Counsel in this case.

33. In my opinion the fourth factor—the amount involved, and the results obtained—is the most important factor, and it strongly supports the requested fee award. Courts have frequently held that the “[t]he most important element in determining the appropriate fee to be awarded class counsel out of a common fund is the result obtained for the class through the effort of such counsel.” *See, e.g., In re Domestic Air. Transp. Antitrust Litig.*, 148 F.R.D. 297, 351 (N.D. Ga. 1993). Here, the amount involved is large because the Settlement creates a Settlement Fund of \$13,597,625.00. That is a superb result given the challenges detailed above faced by Class Counsel. In particular, for those Settlement Class members to whom it was not paid or was under paid, Sales Tax will be the largest part of their recovery, and the Settlement provides them 100% of the nonpayment or underpayment. The \$62.50 in fees represent approximately 55% to 78% of the maximum recoverable Regulatory Fees. Those are extraordinary recoveries in a class action.

34. The percentage of the damages pleaded for by the plaintiffs or calculated by their experts typically recovered by approved settlements in class actions is very low. One study of securities class actions showed the settlements on average recovered less than 15% of the potential damages. In my experience, large consumer and breach of contract class actions (involving potentially tens of millions of dollars in damages), typically recover less than 50% of the potential damages. Accordingly, a settlement of that type of case which recovers 50% to 80% of potential damages is considered exceptional.

35. In my opinion, the fifth factor—the time limitations imposed by the client or by the circumstances—is not applicable. Neither imposed any particular limitations in this case. However, Class Counsel pushed this case to resolution as quickly as possible given its nature in order to provide relief to the Settlement Class as quickly as possible.

36. In my opinion, the sixth factor—the nature and length of the professional relationship with the client—supports the requested fee award. The Plaintiffs were one-time clients who could not be expected to ever provide work again to Class Counsel. So, this was not the type of situation where an ongoing, mutually beneficial relationship would naturally result in counsel providing more favorable rates.

37. In my opinion, the seventh factor—the experience, reputation, and ability of the lawyers performing the service—strongly supports the requested fee award. As evidenced by the CV's attached to the declarations, Class Counsel are extremely experienced and able attorneys with reputations as top national class action practitioners. For example, I am a former co-chair of the American Association of Justice Class Action Litigation Group and numerous of Class Counsel have been selected as Super Lawyers in their states in the Class Action category. Equally important, Class Counsel have successfully prosecuted several prior total loss class actions in other

states. Very few lawyers outside of Class Counsel have done so, while a number have failed in the attempt.

38. In my opinion, the eighth factor—whether the fee is fixed or contingent on results obtained or uncertainty of collection before the legal services have been rendered—strongly supports the requested fee award. Of course, Class Counsel’s fee was purely contingent on the results obtained, and the case was highly risky as discussed above. Defendants were vigorously defending this case and had multiple legal and factual defenses to both certification and the merits. They were defended by very able counsel from a very large, highly regarded national firm, Dykema Gossett PLLC. Between class certification practice, a mandatory interlocutory appeal of certification, summary judgment practice, trial, post-verdict motions, and appeal, Class Counsel faced a significant risk of recovering for the Settlement Class less than the Settlement recovers or nothing at all and taking 3 to 5 years to finalize whatever recovery they made, all of which make the case very risky.

39. The purely contingent and highly risky nature of the case justifies two things. First, it justifies what might be considered the high hourly rates of Class Counsel. But those rates do not nearly compensate for the risk. After all, the highly skilled litigators defending class actions who are guaranteed payment by their large corporate clients typically charge rates as high or higher than Class Counsel. Second, the nature of the case justifies Class Counsel receiving 200% of their lodestar. Without such a “risk multiplier,” it would make no sense for Class Counsel to take on the risk. If all Class Counsel could expect to receive was their lodestar, they would either take non-contingent hourly work with a very low risk of non-payment or very low risk contingent work—contingent cases that almost always settle profitably, such as personal injury automobile accident litigation. Lawyers like Class Counsel can only be expected to take on large, expensive, time

consuming, difficult, and risky class action cases against large deep-pocketed corporations if they can reasonably expect that favorable settlements or judgments will result in them recovering fees that are multiples of their lodestars. After all, plaintiff's counsel in class actions will not infrequently recover nothing, and multipliers in successful cases are needed to offset the zero recovery cases or such work will not only fail to recover bare lodestars overall but also be nonprofitable. The Jeeves Mandel Team would not have accepted employment in this matter but for the opportunity of a multiplier being applied upon successful litigation.

40. Finally, the out-of-pocket expenses of Class Counsel fronted on a purely contingent basis in this case total \$130,808.78. I am familiar with all the items paid for by Class Counsel and the amounts paid for them, and based on my extensive experience, it is my opinion that these items and the amounts paid for them were reasonably and necessarily incurred in the successful pursuit of this case. Indeed, for a large complex class action involving multiple six figures, it is very common for class counsel to spend hundreds of thousands of dollars. So, an expenditure of only \$130,808.78 is very low.

My name is Roger Leon Mandel, and my work address is 2833 Crockett St., Suite 135, Fort Worth, TX 76107, United States of America. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Tarrant County, State of Texas, on the 11th day of August, 2023.

/s/Roger L. Mandel
Roger L. Mandel

EXHIBIT

A

Education:

University of Texas School of Law,
J.D. with honors, 1986

- Order of the Coif
- Board of Advocates
- Benton Moot Court Team, 1986
- ABA Moot Court Team, 1986
- Dean's Award of Distinction
(highest grade in class) in
Bankruptcy, Constitutional Law,
Advanced Constitutional Law and
Evidence

University of Texas at Austin,
B.B.A. with high honors, 1984

- Phi Eta Sigma, Beta Gamma
Sigma and Golden Key Honor
Societies

Admissions:

State of Texas, 1987

Board Certified--Civil Appellate
Law, Texas Board of Legal
Specialization, 1998

United States District Courts

Northern District of Texas

Southern District of Texas

Eastern District of Texas

Western District of Texas

Eastern District of Wisconsin

United States Court of Appeals for
the Second Circuit

United States Court of Appeals for
the Fourth Circuit

United States Court of Appeals for
the Fifth Circuit

United States Court of Appeals for
the Sixth Circuit

United States Court of Appeals for
the Seventh Circuit

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Roger L. Mandel is a prominent Dallas business litigation and class-action lawyer. Mr. Mandel holds the distinction of successfully trying one of only two class-action cases in Texas state court history known to have been tried to a jury.

Mr. Mandel has been named as a *Texas Super Lawyer* in the Class Action/Mass Torts category by *Texas Monthly Magazine* since the inception of the ratings in 2003, as a Top 100 Trial Lawyer and Top 25 Class Action Trial Lawyer by The National Trial Lawyers since the inception of the honor in 2013, and as one of the Best Lawyers in Dallas in the Class Action category by *D Magazine* since the inception of the category in 2014. He also has earned Martindale-Hubbe's coveted top AV® Preeminent rating.

Mr. Mandel currently sits on the Board of Directors of the Dallas Trial Lawyers Association and the Public Justice Foundation and is a past board member of the Texas Trial Lawyers Association. He is a past president of the Dallas Trial Lawyers Association and a fellow of both the Texas Bar Foundation (Top 1/3 of 1% of Texas lawyers) and the Dallas Bar Foundation. Additionally, Mr. Mandel was the co-chair of the AAJ Class Action Litigation Group.

A member of the Texas State Bar, Mr. Mandel is also admitted to practice in the Eastern, Northern, Southern and Western Federal Districts of Texas, the Eastern District of Wisconsin, the

United States Court of Appeals for the Eighth Circuit

United States Court of Appeals for the Ninth Circuit

United States Court of Appeals for the Eleventh Circuit

United States Supreme Court

Memberships and Affiliations:

Dallas Trial Lawyers Association

- Past president 2011-2012

- President 2010-2011

- President-elect 2009-2010

- Vice president 2008-2009

- Board of directors, 1997-2023

Texas Trial Lawyers Association

- Board of directors, 2002-2016

American Association of Justice

- Class Action Litigation Group

- Co-chair 2010-2011

- Vice-chair 2009-2010

Public Justice Foundation

- Board of Directors, 2001-2023

- Executive Committee, 2016-2017 and 2020-2021

National Association of Consumer Attorneys

State Bar of Texas

Fellow of the Texas Bar

Foundation (Top 1/3 of 1% of Texas lawyers)

Dallas Bar Association

Fellow of the Dallas Bar Foundation

American Bar Association

- Tort and Insurance Practice Section

- Commercial Torts Committee, Vice-chairman, 1994-2002

Section of Litigation

Class Action & Derivative Suits Committee

United States Courts of Appeals for the Second, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth and Eleventh Circuits, and the United States Supreme Court.

Philanthropic, caring and immersed in Dallas-Fort Worth community social action, Mr. Mandel values the importance of improving the world. Mr. Mandel currently serves on the board of directors of the Jewish Federation of Fort Worth and Tarrant County.

Verdicts and Settlements - Class-Action Accomplishments

Settlement of a nationwide class-action suit against American Airlines under ERISA related to pension benefits of its former AirCal pilots.

Settlement of a nationwide class-action suit against Wells Fargo Bank for violations of RESPA.

Settlement of statewide class-action suit against State Farm Insurance Cos., Allstate Insurance Cos., Farmers Insurance Cos. and GEICO Insurance Cos. for violations of the Texas Insurance Code relating to claims procedures for automobile policyholders.

Settlement (along with multiple co-counsel) of major nationwide class-action suit litigation involving General Motors pickup trucks.

Settlement following summary judgment of a statewide class action for breach of contract and deceptive trade practices against Southwestern Bell Mobile Systems.

Settlement of a statewide class-action suit on behalf of customers of Southwestern Bell Telephone Company for violations of the Texas Finance Code.

Settlement of a statewide class-action suit on behalf of persons who entered into lease agreements with UDR Western

Residential, Inc., and other of its affiliates, arising out of claims under the Texas Water Code, regulations of the Texas Natural Resources Conservation Commission, the Texas Utility Code, regulations of the Public Utility Commission and the Texas Debt Collection Practices Act.

Settlement of a nationwide class-action suit on behalf of customers of Ticketmaster Group, Inc., and certain of its affiliates, who purchased tickets with a credit card and were charged illegal surcharges.

Settlement of a nationwide class-action suit against First USA Bank for violations of the Truth in Lending Act.

Obtained judgment (following summary judgment and jury trial) against the Dallas County Community College District on behalf of a class of current and former students as a result of the District charging of a technology fee that the trial court found was not authorized by state law. This is one of only two class-action cases known by Mr. Mandel to have been tried in the Texas state courts.

Settlement of a nationwide class-action suit against Sears Roebuck & Co. representing a landmark and virtually unprecedented settlement of a consumer class-action case. Under the settlement, Sears installed, free of charge, for a class of almost four million customers, anti-tip brackets to prevent tipping of its freestanding electric and gas ranges that frequently caused severe burns, crushing and death. Those customers who had already paid to have anti-tip brackets installed received reimbursement. Furthermore, Sears agreed to install anti-tip brackets on all sales of new ranges for at least three years, now believed by Mr. Mandel to be a permanent practice of Sears. By, in effect, obtaining a recall, this settlement actually obtained better relief than likely could have been obtained through trial and accomplished what the Consumer Product Safety Commission refused to do for more than twenty years.

Settlement against Nationwide Insurance Company on behalf of a national class related to overcharges on life insurance

premiums. Notably, the settlement was achieved after obtaining a contested certification of a nationwide class under the laws of all 50 states.

A settlement in a class-action suit over the purchase of TXU, one of the largest purchases of a publicly traded company in United States history.

A settlement in a derivative case against officers and directors of Affiliated Computer Systems related to options backdating.

A settlement in a securities class-action suit against officers and directors of the investment manager of the Cushing MLP Total Return Fund.

A settlement of a nationwide class action on behalf of a class of 401(k) plans against their investment provider, Nationwide Insurance, for paying the mutual funds it offered as investments, thought to be one of the three largest ERISA settlements in history.

A settlement of a nationwide class action against the insurers, brokers, and promoters responsible for offering illegal group and blanket insurance policies.

A settlement of a nationwide class action against a trust fund for failure to pay digital royalties to session musicians.

A settlement of a statewide class action against Ciox Health for overcharging for medical records in Texas.

Settlements of statewide class actions against Progressive and USAA for underpayment of first party automobile total loss claims.

Complex Business Litigation Accomplishments

Settlement with a medical malpractice insurer in an insurance coverage/bad faith case following a medical malpractice jury verdict and a coverage verdict.

Settlement of business tort litigation on behalf of the former owner of a major league sports franchise against a national bank relating to the sale of the franchise.

Settlement of tortious interference with business contract litigation on behalf of a large independent electrical

supplier/contractor following a jury verdict.

Jury verdict and judgment against Henry S. Miller Commercial Company based upon fraud and negligent misrepresentation.

Firm Affiliations

Jeeves Mandel Law Group, P.C., Dallas Texas Partner, August 1, 2018, to present.

Lackey Hershman L.L.P., Dallas, Texas
Partner, July 1, 2011 - January 3, 2018.

Beckham & Mandel, Dallas, Texas
Founding Shareholder, January 1, 2010-June 30, 2011

Stanley, Mandel & Iola, L.L.P., Dallas, Texas
Founding Partner, 1997-2009

Stanley, Mandel & Kleinman, P.C., Dallas, Texas
Founding Shareholder, August 1992-1997

Hale, Spencer, Stanley, Pronske & Trust, P.C., Dallas, Texas
Associate, 1987-1992

Honors

Best Lawyers in America 2016 and 2017-Mass Tort
Litigation/Class Actions-Plaintiffs

Best Lawyers in Dallas, Class Action, 2014-2022 (*DMagazine*)

Top 100 Trial Lawyers, 2013-2022 (The National Trial Lawyers)

Top 25 Class Action Trial Lawyers, 2013-2022 (The National
Trial Lawyers)

Texas Super Lawyer, Class Action/Mass Torts, 2003-2022
(*Texas Monthly Magazine*)

AV Preeminent Rated, Martindale-Hubbell

Publications and Speeches

Speaker: "The Nexium Conundrum: Class Action Standing
Under Article III, "National Consumer Law Center, 23rd Annual
National Consumer Rights Conference, Class Action
Symposium (November 2014)

Speaker and Author: "Post-Concepcion Enforcement of Arbitration Clauses Containing Class Bans," *American Association of Justice Tele-Seminar* (March 6, 2012)

Speaker and Author: "Certification of Multi-State Classes and Related Choice of Law Issues," *American Association of Justice* (Vancouver, July 2010)

Speaker: "Shady Grove and Naked Class Action Bans: The Emerging Conflicts Between Federal and State Laws on Class Certification, Multistate Classes and Choice of Law Issues," NCLC Class Action Symposium (Philadelphia, 2009)

Co-moderator: "New Developments in Class Actions," American Association of Justice (San Francisco, July 2009)

Coauthor: "Navigating the Rough Terrain: Class Actions in Texas after HB4 and CAFA," *The Advocate* (The State Bar Litigation Section Report) (Fall 2008)

Author: "Arbitration: Should It Be Sought Rather Than Fought," Consumer Law & Policy Blog (December 3, 2006)

Speaker: "Arbitration of Consumer Class-Action Cases," NCLC Consumer Class Action Symposium (Miami, 2006)

Speaker: "Credit Card Developments," 10th Annual Consumer Financial Services Litigation Institute (PLI, Dallas, TX, 2005)

Author: "The Class Action Unfairness Act of 2005," Dallas Bar Headnotes, April 1, 2005

Speaker: "Where Will the Big Cases Come From After H.B. 4," Conference on State and Federal Appeals, University of Texas Continuing Legal Education Department, June 2004

Speaker: "Class Action Update," Advanced Personal Injury Seminar, State Bar of Texas, Austin, 2003

Coauthor and Speaker: "Summaries of Significant Class Action Opinions in Texas State and Federal Courts: 2001-2002," Texas Trial Lawyers Association, July 2002

Author: High Court: "Class Action Standards Too Strict," Texas Lawyer, June 2002

Coauthor and Speaker: "Resolving Class Actions in the Plaintiffs Favor: Settlements and Contested Final Judgments," Federal Bar Association, April 2001

Coauthor: "Dealing With Attorney's Fees and Objections in Class Action Settlements," National Institute on Class Actions, American Bar Association, 1997

Author: "Abstracts of Recent State and Lower Federal Court Decisions on Consumer Class Actions," Consumer and Personal Rights Litigation Newsletter, American Bar Association, May 1995.

Author and Speaker: "Mining for Gold: Recognizing Class Actions Arising Out of Your Personal Injury Practice," Texas Trial Lawyers Association, "What You Absolutely Positively Gotta Know About..." November 12-13, 2020.

EXHIBIT

B

Scott R. Jeeves

Attorney & Counselor at Law

Jeeves Law Group

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St. Petersburg, FL 33712
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Admissions

The Florida Bar
Florida Bar Board Certified Civil
Trial Lawyer
Circuit Civil Court
Mediator/Arbitrator

All State Courts of Florida
Middle District of Florida
Southern District of Florida
Northern District of Florida
Eleventh Circuit Court of Appeals

Education

University of Florida
B.A., Political Science, 1988
Stetson College of Law
J.D., 1991

Organizations

American Bar Association
Hillsborough County Bar
Association
Pinellas County Bar Association
Florida Justice Association, *Eagle
Member*
National Association of Consumer
Advocates (NACA), *Member*
Million Dollar Advocates Forum
Public Justice, *Member*

Recognition

Martindale-Hubbell, AV[™] rating
AVVO, 10/10 rating
Florida Legal Magazine, *Legal Elite*
Best Lawyers in Tampa, *Recognition*
Florida's Super Lawyers,
Superlawyer

Practice & Relevant Experience

Scott Jeeves is founding partner of the Jeeves Law Group, specializing in consumer class actions, complex litigation, personal injury, and medical malpractice. He has served as lead counsel, liaison counsel, and class counsel in numerous matters. Notable class actions include:

- *A Kaufman Clinic, Inc., et al. v. Nationwide General Insurance Company, et al.*, Case No.: 09-033393 CACE
- *Total Care Chiropractic & MRI Associates of St. Pete, Inc. v. Mercury Ins. Co. of Florida*, Case No.: 10-12853 CACE
- *MRI Associates of St. Pete, Inc. v. Travelers Insurance Company, et al.*, Case No.: 10-CA-013131
- *MRI Associates of St. Pete, Inc. v. First Acceptance Insurance Company*, Case No.: 10-CA-03919
- *MRI Associates of St. Pete, Inc. v. Metropolitan Casualty Insurance Company*, Case No.: 10-CA-03921
- *MRI Associates of St. Pete, Inc. v. Auto Club South Insurance Company*, Case No.: 10-CA-013134
- *MRI Associates of St. Pete, Inc. v. Dairyland Insurance Company, et al.*, Case No.: 8:11-cv-665-JSM-MAP United States District Court, M.D. Fla.
- *MRI Associates of St. Pete, Inc. v. USAA Casualty Insurance Company et al.*, Case No.: 10-CA-016785
- *Advantage Open MRI, Inc. v. USAA Casualty Insurance Company, et al.* Case No.: 08-11104
- *MRI Associates of St. Pete v. Property & Casualty Insurance Company of Hartford*, Case No.: 10-03925
- *AFO Imaging, Inc. v. Peak Property and Casualty Insurance Corp., et al.*, Case No.: 08-CA-21533
- *AFO Imaging, Inc. v. Nationwide Mutual Ins. Co., et al.*, Case No. 08-CA-021531-I
- *Galura, et al. vs. Sonic Automotive, Inc.* Case No.: 02-12274
- *Gilley v. Ernie Haire Ford, Inc.*, Case No. 02-8101
- *Veal v. Crown Auto Dealerships, Inc.*, Case No. 8:04-CV-0323-T-27MSS, United States District Court, M.D. Fla.
- *Pope v. Charter Warranty, L.L.C.*, Case No.: 06-000083
- *Mantzouris, et al. v. Scarritt Motor Group, Inc.*, Case No.: 03-CV0015-T-30, United States District Court, M.D. Fla.
- *Croxall, et al. v. Asbury Automotive, L.P.*, Case No.: 03-6201,
- *Cotten, et al. v. Ferman Management Services Corporation, et al.*, Case No.: 02-08115

EXHIBIT C

TimeKeeper Manager Report

<i>Date</i>	<i>Time</i>	<i>Case Name</i> <i>Explanation</i>	<i>User</i>	<i>Hourly</i> <i>Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours</i> <i>Worked</i>	<i>Billable</i> <i>Time</i>	<i>Billed</i>	<i>Billed</i> <i>Date</i>
8/17/2020	6:38 AM	Stewart, Kelly v. USAA Began legal research regarding Texas Insurance Code claims (6.0).	Roger L. Mandel	\$950.00	6	\$5,700.00			8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/18/2020	6:41 AM	Stewart, Kelly v. USAA Continued legal research regarding Texas Insurance Code claims (4.0).	Roger L. Mandel	\$950.00	4	\$3,800.00			8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/19/2020	6:43 AM	Stewart, Kelly v. USAA Began drafting Complaint. (8.5).	Roger L. Mandel	\$950.00	8.5	\$8,075.00			8.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/20/2020	6:45 AM	Stewart, Kelly v. USAA Continued drafting Complaint (7.5).	Roger L. Mandel	\$950.00	7.5	\$7,125.00			7.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/21/2020	6:46 AM	Stewart, Kelly v. USAA Continued drafting Complaint (6.4).	Roger L. Mandel	\$950.00	6.4	\$6,080.00			6.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/22/2020	6:46 AM	Stewart, Kelly v. USAA Continued drafting Complaint (5.6)	Roger L. Mandel	\$950.00	5.6	\$5,320.00			5.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/24/2020	6:48 AM	Stewart, Kelly v. USAA Work on revisions to Complaint per discussions with Co-Counsels (3.4)	Roger L. Mandel	\$950.00	3.4	\$3,230.00			3.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/25/2020	6:50 AM	Stewart, Kelly v. USAA Continued with revisions per discussions with Co-Counsel and suggestions from co-counsels (3.2).	Roger L. Mandel	\$950.00	3.2	\$3,040.00			3.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/26/2020	7:19 PM	Stewart, Kelly v. USAA Review of initial complaint in this matter.	Kyle W. Woodford	\$295.00	1	\$295.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/26/2020	5:01 PM	Stewart, Kelly v. USAA Review initial Complaint;	Scott R. Jeeves	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/26/2020	6:51 AM	Stewart, Kelly v. USAA Completed revisions to Complaint and one final review prior to filing (1.4).	Roger L. Mandel	\$950.00	1.4	\$1,330.00			1.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
10/14/2020	1:14 PM	Stewart, Kelly v. USAA Review email from USAA's counsel designating appraiser and email with co-counsel re no need to respond (0.1); Review letter from USAA's counsel denying claim and refusing to make offer pursuant to Ch. 541 and email to co-counsel re ability to amend to add Ch 541 damages (0.2). Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/14/2020	4:33 PM	Stewart, Kelly v. USAA Reviewed email from OC re designation of appraiser and emailed with co-counsel; reviewed letter from OC denying claim; reviewed emails from Co-counsel to OC re ability to amend.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/16/2020	1:15 PM	Stewart, Kelly v. USAA Review Answer filed by USAA (0.2); Email with co-counsel re same and next steps in case (0.2). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/16/2020	8:10 PM	Stewart, Kelly v. USAA Review USAA's answer to the complaint.	Kyle W. Woodford	\$295.00	0.8	\$236.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/16/2020	4:58 PM	Stewart, Kelly v. USAA Reviewed Answer from Defendant to the Complaint and reviewed emails and responded from Co-Counsels.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/19/2020	1:16 PM	Stewart, Kelly v. USAA Email with E. Normand re whether to send and contents of letter responding to appraisal demands (0.2); Email to staff re producing same (0.1). Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/19/2020	9:32 AM	Stewart, Kelly v. USAA Reviewed emails from R. Mandel to E. Normand and staff.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/22/2020	1:16 PM	Stewart, Kelly v. USAA Review original Petition and relevant statutes and begin drafting First Amended petition (2.8); T/c re same and re ruling obtained in another Court in Texas with E. Normand (0.2); Total 3.0.	Roger L. Mandel	\$950.00	3	\$2,850.00			3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/26/2020	1:17 PM	Stewart, Kelly v. USAA Email to co-counsel re providing last Word version of original petition. Total 0.1.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/26/2020	5:02 PM	Stewart, Kelly v. USAA Reviewed emails with Co-Counsel re amending complaint and provided a copy of the complaint.	Scott R. Jeeves	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/27/2020	1:18 PM	Stewart, Kelly v. USAA Continue drafting First Amended Petition (3.2); Review and revise letters to opposing counsel on behalf of all three plaintiffs responding to appraisal demands (0.5). Total 3.7.	Roger L. Mandel	\$950.00	3.7	\$3,515.00			3.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
10/28/2020	1:18 PM	Stewart, Kelly v. USAA Completer drafting First Amended Complaint (1.8); Email with co-counsel re same and re next steps in litigation, including locating regulatory fee expert via Expert Institute and scheduling call for same (0.5); Final review and revisions of letters from each plaintiff to USSA counsel declining appraisal and email with K. Hill re serving same (0.5). Total 2.8.	Roger L. Mandel	\$950.00	2.8	\$2,660.00			2.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/28/2020	11:07 AM	Stewart, Kelly v. USAA Reviewed emails from R. Mandel re expert meeting and next step.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/29/2020	1:19 PM	Stewart, Kelly v. USAA T/c with E. Normand re draft FAC and case legal theories and experts and strategy (0.9); Email with him and Expert Institute re scheduling call re expert search (0.1). Total 1.0.	Roger L. Mandel	\$950.00	1	\$950.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/29/2020	11:52 AM	Stewart, Kelly v. USAA Reviewed emails sent by R. Mandel.	Scott R. Jeeves	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/3/2020	3:06 PM	Stewart, Kelly v. USAA Email with opposing counsel re our opposition to motion to compel appraisal (0.1); Email with co-counsel re finalizing amended complaint (0.2); Email with E. Normand and J. Phillips re them taking lead on response to motion to compel and contents of same (0.5); T/c with E. Normand's assistant re timing of response under local rules (0.1); Email with opposing counsel re setting up call to discuss hearing date and case scheduling (0.1). Total 1.0	Roger L. Mandel	\$950.00	1	\$950.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/3/2020	5:12 PM	Stewart, Kelly v. USAA Review USAA's motion to compel appraisal.	Kyle W. Woodford	\$295.00	0.5	\$147.50			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/3/2020	5:33 PM	Stewart, Kelly v. USAA Reviewed and responded to emails to OC and from CO-Counsels.	Scott R. Jeeves	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/5/2020	3:07 PM	Stewart, Kelly v. USAA T/c with Expert Institute and E. Normand re finding regulatory fees and dealer fees experts (0.3); Email with Expert Institute re claims and original complaint (0.1); T/c with K. Woodford re status of amended complaint (0.1); Email with co-counsel re expert institute call (0.1); Email with opposing counsel and co-counsel re scheduling conference (0.2). Total 0.7.	Roger L. Mandel	\$950.00	0.7	\$665.00			0.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/13/2020	3:07 PM	Stewart, Kelly v. USAA Review TRCP rule re discovery control plans and Bexar County Local Rules in preparation for conference with opposing counsel (0.5); T/c with opposing counsel and E. Normand re filing motion for complex designation and setting hearings on same and motion to compel appraisal and scheduling issues for proposed order and drafting of confidentiality and ESI orders and possible stipulations (0.6); Follow up t/c with E. Normand re same and potential expert and responding to motion to compel appraisal and drafting discovery responses (0.4); Review materials received from E. Normand re potential expert and email re same with him (0.3). Total 1.8.	Roger L. Mandel	\$950.00	1.8	\$1,710.00			1.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/13/2020	5:21 AM	Stewart, Kelly v. USAA Reviewed emails with Co-counsel and reviewed attachments provided.	Scott R. Jeeves	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
11/17/2020	3:08 PM	Stewart, Kelly v. USAA Review email from Expert Institute re status of expert search (0.1); Email with opposing counsel re who should be included on Notice of Hearing (0.1); Review filed Notice of Hearing on motion to compel appraisal (0.1); T/c and email with K. Hill re conferring with opposing counsel on who needed to be included in notice of hearing on our motion to designate as complex and with court clerk re procedure for getting on monitoring judge's docket and results of same (0.2); T/c with K. Woodford re drafting motion to designate case as complex (0.1); Review and revise motion and email to k. Woodford re same (0.5); Review revised version, make additional revisions and approve for filing (0.3). Total 1.4.	Roger L. Mandel	\$950.00	1.4	\$1,330.00			1.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/17/2020	11:00 AM	Stewart, Kelly v. USAA Initial draft of motion to designate the case as complex.	Kyle W. Woodford	\$295.00	1.2	\$354.00			1.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/17/2020	5:25 AM	Stewart, Kelly v. USAA Received and reviewed emails from Expert Institute and Co-Counsel. Discussion with K. Hill and K. Woodford.	Scott R. Jeeves	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/18/2020	3:08 PM	Stewart, Kelly v. USAA Review resume of proposed Texas fee expert (0.2); Email with co-counsel re same (0.2); Review draft notice of hearing on motion to designate complex and email with co-counsel re revising time estimate and filing (0.2); Email with co-counsel re drafting of response to motion to compel and E. Normand getting admitted pro hac vice (0.2); Begin review and revision of latest version of first amended complaint received from K. Woodford (1.4). Total 2.2.	Roger L. Mandel	\$950.00	2.2	\$2,090.00			2.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/18/2020	5:28 AM	Stewart, Kelly v. USAA Received and reviewed emails with attachments from Co-Counsels and respond.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/19/2020	3:08 PM	Stewart, Kelly v. USAA Review and email with co-counsel re adding unopposed to motion and its form for filing and new agreed order for pro hac vice motion for E. Normand (0.4); Email with opposing counsel and co-counsel re lack of opposition to each side's pro hac motions and agreement to our agreed order (0.2); Review local rules on getting unopposed motions entered without scheduling hearing on same and email and t/c with K. Hill re same, including her conferring with district clerk (0.3); Email with E. Normand re proposed expert (0.1); Email with opposing counsel and co-counsel re changing hearing date for motion to compel appraisal (0.2); Review filed amend notice of hearing (0.1). Total 1.3.	Roger L. Mandel	\$950.00	1.3	\$1,235.00			1.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/19/2020	5:30 AM	Stewart, Kelly v. USAA Reviewed emails from Co-Counsels and to OC; Responded to all.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/20/2020	4:20 PM	Stewart, Kelly v. USAA Final edits to draft of our motion to designate case as complex.	Kyle W. Woodford	\$295.00	1	\$295.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/23/2020	3:09 PM	Stewart, Kelly v. USAA Attend docket call and argue on motion to designate as complex (0.5); Email with court clerk re court entering order without my providing proposed order (0.1); Email with co-counsel re outcome of hearing (0.1); Review entered order identifying assigned judge, conduct research on assigned judge and email to co-counsel re same (0.4); Review proposed contract from expert and email to expert requesting two changes (0.4). Total 1.5.	Roger L. Mandel	\$950.00	1.5	\$1,425.00			1.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/23/2020	5:37 AM	Stewart, Kelly v. USAA Reviewed, received and responded to Co-Counsel's emails re hearing and Expert.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
12/4/2020	5:17 PM	Stewart, Kelly v. USAA Initial draft of proposed ESI order.	Kyle W. Woodford	\$295.00	1.1	\$324.50			1.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/8/2020	6:00 PM	Stewart, Kelly v. USAA Review our response to USAA's motion to compel appraisal.	Kyle W. Woodford	\$295.00	0.9	\$265.50			0.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/11/2021	2:58 PM	Stewart, Kelly v. USAA Review case status and scheduled hearing and email to co-counsel re having t/c to discuss same (0.2); Review revised agreement with fee expert and email with co-counsel re same (0.2). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/11/2021	5:43 AM	Stewart, Kelly v. USAA Reviewed and Responded to emails from Co-Counsel re status.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/12/2021	2:58 PM	Stewart, Kelly v. USAA Review of USAA reply in support of motion to compel appraisal (0.7); email with E. Normand re scheduling time to discuss reply and to prepare for hearing on motion (0.1); Email with opposing counsel re scheduling call on docket control motion and order and confidentiality and ESI orders and procedures for Zoom hearing (0.2). Total 1.0.	Roger L. Mandel	\$950.00	1	\$950.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/12/2021	5:48 AM	Stewart, Kelly v. USAA Reviewed emails from Co-Counsel to OC re ESI order.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/13/2021	2:02 PM	Stewart, Kelly v. USAA Reviewed Defendant's Reply in Support of Motion to Compel Appraisal and Abate Lawsuit Pending Appraisal.	Scott R. Jeeves	\$650.00	0.2	\$130.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/13/2021	2:59 PM	Stewart, Kelly v. USAA Email with E. Normand to schedule call (0.1); T/c with E. Normand to discuss USSA reply and prepare for hearing (1.8); Email with opposing counsel and court re procedure for Zoom hearing and providing court pleadings and case law (0.2); Review pleadings and case law provided to court by opposing counsel (0.8); Review documents and case law provided by co-counsel to court (0.3). Total 3.3.	Roger L. Mandel	\$950.00	3.3	\$3,135.00			3.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/14/2021	2:59 PM	Stewart, Kelly v. USAA Prepare for hearing on motion to compel appraisal (0.5); participate in Zoom hearing (1.8); T/c w/ E. Normand re hearing (0.2); T/c with other co-counsel re same (0.1); Email with opposing counsel and co-counsel re scheduling call on various draft orders (0.2). Total 2.7.	Roger L. Mandel	\$950.00	2.7	\$2,565.00			2.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/14/2021	5:49 AM	Stewart, Kelly v. USAA Phone call with R. Mandel re upcoming hearing and review.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
1/15/2021	2:59 PM	Stewart, Kelly v. USAA	Roger L. Mandel	\$950.00	4.6	\$4,370.00			4.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Review revised ESI order received from opposing counsel, make further revisions and email to opposing counsel re same (0.5); Review proposed confidentiality order received from opposing counsel, review TRCP 76a, revise proposed order and lengthy email to opposing counsel re ways to modify order to comply with Rule (0.9); Review revised docket control motion and order received from opposing counsel in preparation for call (0.2); T/c with opposing counsel, T. Sanders, and co-counsel E. Normand, re all of same, lack of need to bifurcate discovery, schedule and scope of discovery (1.8); Follow up t/c with E. Normand re same and re memo from court saying motion to compel appraisal denied (0.3); Email to other co-counsel summarizing call and plan going forward (0.2); Draft order denying appraisal motion (0.3); Draft lengthy email to opposing counsel re expected scope of discovery and lack of need to bifurcate discovery and proposed order denying appraisal (0.4). Total 4.6.										
1/15/2021	6:00 PM	Stewart, Kelly v. USAA	Kyle W. Woodford	\$295.00	0.2	\$59.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Review order denying appraisal.										
1/15/2021	5:58 AM	Stewart, Kelly v. USAA	Scott R. Jeeves	\$950.00	0.7	\$665.00			0.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Reviewed and Responded to emails with Co-Counsel, reviewed drafts received from OC re ESI Order and Confidentiality Order.										
1/25/2021	3:00 PM	Stewart, Kelly v. USAA	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Email with co-counsel re status of various motions. Total 0.1										
1/25/2021	6:00 AM	Stewart, Kelly v. USAA	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Reviewed and responded to emails with Co-Counsels.										
2/5/2021	8:07 AM	Stewart, Kelly v. USAA	Roger L. Mandel	\$950.00	1	\$950.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Review and revise proposed ESI order and email to opposing counsel re same (0.3); Review and revise discovery control plan motion and order and email to opposing counsel re same (0.6); Email to opposing counsel re status of confidentiality order (0.1). Total 1.0.										
2/5/2021	6:02 AM	Stewart, Kelly v. USAA	Scott R. Jeeves	\$950.00	0.6	\$570.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Received, reviewed and responded to emails from Co-Counsel and OC; reviewed drafts to ESI order and Discovery Control Plan.										
2/10/2021	8:05 AM	Stewart, Kelly v. USAA	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Email with opposing counsel re ESI order. Total 0.1.										
2/10/2021	8:07 AM	Stewart, Kelly v. USAA	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Email with opposing counsel re ESI order. Total 0.1.										
2/10/2021	6:05 AM	Stewart, Kelly v. USAA	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Received, Reviewed and Responded to emails from Co-Counsel.										
2/11/2021	8:08 AM	Stewart, Kelly v. USAA	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Email with opposing counsel re status of various orders. Total 0.1.										

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
2/11/2021	6:06 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/15/2021	8:08 AM	Stewart, Kelly v. USAA Review revised confidentiality agreement received from opposing counsel and email to him suggesting revised language and asking status on ESI order. Total 0.6.	Roger L. Mandel	\$950.00	0.6	\$570.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/15/2021	6:07 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/19/2021	8:08 AM	Stewart, Kelly v. USAA Email with court re procedure for submitting orders. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/19/2021	6:08 AM	Stewart, Kelly v. USAA Received and Reviewed emails from Co-Counsel.	Scott R. Jeeves	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/22/2021	8:09 AM	Stewart, Kelly v. USAA Final review and revision of discovery control motion, discovery control order, protective Order and ESI Order (1.2); Email with Court re same (0.2); Email with E. Normand re discovery to be sent now (0.2). Total 1.6.	Roger L. Mandel	\$950.00	1.6	\$1,520.00			1.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/22/2021	6:08 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel; reviewed discovery control Motion draft and ESI,	Scott R. Jeeves	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/25/2021	8:09 AM	Stewart, Kelly v. USAA Email with co-counsel re scheduling call. Total 0.1.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/25/2021	6:10 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/5/2021	10:15 AM	Stewart, Kelly v. USAA Email with co-counsel re scheduling call (0.1); T/c with E. Normand re discovery requests and case strategy (0.2). Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/5/2021	6:11 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/10/2021	10:15 AM	Stewart, Kelly v. USAA Review and revise Request for Disclosures (0.2); Review and revision of Requests for Production (1.6). Total 1.8 .	Roger L. Mandel	\$950.00	1.8	\$1,710.00			1.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
3/11/2021	10:16 AM	Stewart, Kelly v. USAA Continue review and revision of request for production and email to co-counsel re same. Total 0.7.	Roger L. Mandel	\$950.00	0.7	\$665.00			0.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/11/2021	6:11 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel. Reviewed drafts of Discovery from Co-Counsel.	Scott R. Jeeves	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/26/2021	10:16 AM	Stewart, Kelly v. USAA T/c with E. Normand and J. Phillis re fee experts, possibility of adding dealer fees to the case and status f discovery. Total 0.8.	Roger L. Mandel	\$950.00	0.8	\$760.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/30/2021	10:16 AM	Stewart, Kelly v. USAA Email with co-counsel re status of discovery requests. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/30/2021	6:13 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/31/2021	10:17 AM	Stewart, Kelly v. USAA Email with co-counsel re status of amended complaint. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/31/2021	6:14 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/1/2021	3:48 PM	Stewart, Kelly v. USAA Email with co-counsel re status of amended petition and addition of dealer fees. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/1/2021	6:14 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/5/2021	3:48 PM	Stewart, Kelly v. USAA Review and revise amended petition (3.3); Email with co-counsel re same before filing (0.2). Total 3.5.	Roger L. Mandel	\$950.00	3.5	\$3,325.00			3.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/5/2021	6:15 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel. Reviewed Amended Complaint.	Scott R. Jeeves	\$950.00	0.6	\$570.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/12/2021	3:49 PM	Stewart, Kelly v. USAA T/c with K. Woodford re putting together dealer fee discovery (0.1); Review, revise and add to dealer fee RFP's and Interrogatories (1.1); Email to co-counsel re same (0.1). Total 1.3.	Roger L. Mandel	\$950.00	1.3	\$1,235.00			1.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
4/12/2021	6:16 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel. Reviewed drafts of Discovery.	Scott R. Jeeves	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/26/2021	3:49 PM	Stewart, Kelly v. USAA Email with co-counsel re status of discovery requests. Total 0.1.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/26/2021	6:18 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/27/2021	3:50 PM	Stewart, Kelly v. USAA Review and revise latest versions of discovery requests received from co-counsel and email and t/c with co-counsel re further revisions to same. Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/27/2021	6:17 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel. Reviewed revised discovery documents.	Scott R. Jeeves	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/28/2021	3:50 PM	Stewart, Kelly v. USAA T/c with staff re and review order re applicability of TRCP changes to our case (inapplicable) (0.2); Email with co-counsel re procedures for service of discovery requests (0.1). Email to co-counsel re responding to USAA's discovery requests (0.1). Total 0.4	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/28/2021	6:21 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/29/2021	3:51 PM	Stewart, Kelly v. USAA Email with co-counsel re who will draft responses to USAA's requests and status of service of our requests (0.1); Review served versions of our requests and email with co-counsel re need to withdraw Interrogatories, fix errors and re-serve them (0.5);	Roger L. Mandel	\$950.00	0.6	\$570.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/29/2021	6:19 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/13/2021	1:35 PM	Stewart, Kelly v. USAA Email with staff re status of pro hac vice motions and bringing to Court's attention if no order have been entered Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/13/2021	6:22 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel.	Scott R. Jeeves	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
5/18/2021	1:35 PM	Stewart, Kelly v. USAA Email with co-counsel re status of Plaintiff's discovery responses (0.2); Email with staff re status of pro hac vice motions and gathering them with proposed orders to send to Judge (0.2). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/18/2021	6:22 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/19/2021	1:36 PM	Stewart, Kelly v. USAA Review email from opposing counsel requesting extension on discovery requests and t/c with counsel re same, including what type of responses and document production we could expect and possible effect on schedule and possible need to extend schedule and email confirming reciprocal extensions in response (0.3); T/c with co-counsel re same and re necessary experts, including need for expert on how sales tax works on leased cars in Texas (0.2); T/c with T. Stockton re need for such expert and whether he can fill role (0.2); T/c with K. Woodford re gathering Edmunds dealer fee articles to produce (0.2); Review all pro hac vice motions compiled by staff to send to Court (0.2). Total 1.3	Roger L. Mandel	\$950.00	1.3	\$1,235.00			1.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/19/2021	6:25 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel and OC re extension.	Scott R. Jeeves	\$950.00	0.6	\$570.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/20/2021	1:36 PM	Stewart, Kelly v. USAA T/C with K. Hill re pro hac vice order entered for E. Normand and drafted proposed orders to send to Court (0.2); Reviewed order admitting Normand and drafts of orders for other co-counsel (0.2); Reviewed rules re pro hac vice to see if any specific language required in orders (0.2); T/c with K. Hill re obtaining missing file-stamped motions and putting together motions with exhibits (0.2).	Scott R. Jeeves	\$650.00	0.8	\$520.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/2/2021	7:26 AM	Stewart, Kelly v. USAA Email with co-counsel re status of clients' discovery responses. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/2/2021	6:26 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/4/2021	5:08 PM	Stewart, Kelly v. USAA Pull the non-bates stamped Edmunds documents that were used in Stockton's recent Desai depo (to be used in this case).	Kyle W. Woodford	\$295.00	2	\$590.00			2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/5/2021	4:40 PM	Stewart, Kelly v. USAA Upload all of the Edmunds documents necessary for this case, per RLM's request.	Kyle W. Woodford	\$295.00	1	\$295.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/10/2021	7:27 AM	Stewart, Kelly v. USAA Work on clients' discovery responses, including review and revision of Simon's and Stewart's responses, review of documents to be produced by them and Arevalo and multiple emails and t/c's with co-counsel re same. Total 8.5.	Roger L. Mandel	\$950.00	8.5	\$8,075.00			8.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
6/10/2021	11:06 AM	Stewart, Kelly v. USAA Numerous emails and final t/c with Mariam Grigorian on latest filing so we can update our file.	Kyle W. Woodford	\$295.00	1.2	\$354.00			1.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/10/2021	5:07 PM	Stewart, Kelly v. USAA Additional follow up on Texas DOI premiums.	Kyle W. Woodford	\$295.00	1	\$295.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/10/2021	6:27 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel; reviewed Plaintiff's Discovery responses.	Scott R. Jeeves	\$950.00	0.6	\$570.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/10/2021	4:32 PM	Stewart, Kelly v. USAA Find Texas DOI premiums paid by the Defendants for years 2016-2020. Adjust each PDF so that they are reduced to the applicable portions needed. Give to Roger Mandel.	Kyle W. Woodford	\$295.00	3.5	\$1,032.50			3.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/11/2021	7:27 AM	Stewart, Kelly v. USAA Work on clients' discovery responses, including further review and revision of Simon's and Stewart's responses, review and revision of Arevalo's responses, review of documents to be produced by them and Arevalo and multiple emails and t/c's with co-counsel re same. Total 8.2.	Roger L. Mandel	\$950.00	8.2	\$7,790.00			8.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/11/2021	6:29 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel.	Scott R. Jeeves	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/13/2021	7:28 AM	Stewart, Kelly v. USAA Email with C. Neff re preparation of Arevalo documents processed through Disco and timing on production. Total 0.1.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/13/2021	6:30 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/14/2021	7:28 AM	Stewart, Kelly v. USAA Review final plaintiff's discovery responses as served by us and email to co-counsel re same, including items still required (0.3); Review defendants' discovery responses (0.7); Email to co-counsel re following up n same, including setting a call among co-counsel re same prior to conferring with opposing counsel (0.2); Review Arevalo documents as prepared for production by C. Neff (0.3); Email to C. Neff re addition of confidentiality designations to certain documents (0.1); Review documents as received from co-counsel re Simon and Stewart to be produced prior to sending to C. Neff foe processing (0.3). Total 1.4.	Roger L. Mandel	\$950.00	1.4	\$1,330.00			1.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/14/2021	6:31 AM	Stewart, Kelly v. USAA Received, Reviewed and Responded to emails from Co-Counsel. Reviewed Defendant's Discovery Responses.	Scott R. Jeeves	\$950.00	1	\$950.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
6/16/2021	7:29 AM	Stewart, Kelly v. USAA Email to C. Neff re processing Simon documents through Disco for production (0.2); Email with co-counsel re issues relating to release of Garrison possibly signed by Stewart (0.2); Email with co-counsel re status of further document production and verifications from our clients (0.2); Email with co-counsel re setting up call to discuss USAA's discovery responses (0.1); Review addition documents to be produced for Plaintiff Arevalo; Email re same with co-counsel (0.2); Email with opposing counsel re their initial document production (0.1); Email to C. Neff re reviewing for compliance with ESI Order and ingesting into Disco if in compliance (0.1). Total 1.2.	Roger L. Mandel	\$950.00	1.2	\$1,140.00			1.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/16/2021	5:55 PM	Stewart, Kelly v. USAA Reviewed emails from R. Mandel re discovery documents.	Scott R. Jeeves	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/17/2021	7:29 AM	Stewart, Kelly v. USAA Email with co-counsel re need to discover exact nature of release signed by Stewart and possible effect upon her as class representative and discussion of Normand's call with Stewart and needed follow up to that and possible need for other plaintiffs. Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/17/2021	5:57 PM	Stewart, Kelly v. USAA Reviewed and responded to emails re Discovery Responses.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/18/2021	7:29 AM	Stewart, Kelly v. USAA Email with co-counsel re scheduling conference on and issues associated with pursuing better response to discovery from USAA and re our document production and obtaining client verifications (0.2); Review Lexis background report on Stewart (0.3); Review Stewart claim file as produced by USAA (1.8); Email with co-counsel re what to do about Stewart given criminal history, ability to find substitute plaintiffs, and nature of claim for which she gave release and obtaining documentation re same (0.4); Review Stewart documents to be produced, including Edmunds reports and TDI reports, and emails to C. Neff reproduction of same through Disco and summarizing other document productions and ingests (0.6); Review USAA's RFP and email with co-counsel re lack of need to produce release (0.2); Review additional documents to be produced by Arevalo and email to C. Neff re same (0.2). Total 3.7.	Roger L. Mandel	\$950.00	3.7	\$3,515.00			3.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/18/2021	5:18 PM	Stewart, Kelly v. USAA Edit final draft of proposed ESI order.	Kyle W. Woodford	\$295.00	1.4	\$413.00			1.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/18/2021	5:58 PM	Stewart, Kelly v. USAA Reviewed and responded to emails.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/21/2021	7:30 AM	Stewart, Kelly v. USAA Review documents as processed to be produced by C. Neff (1.2); T/c's with C. Neff and K. Woodward re changes needed to Simon and Stewart productions and compliance with instructions on Arevalo production (0.4). Total 1.6	Roger L. Mandel	\$950.00	1.6	\$1,520.00			1.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/21/2021	7:03 PM	Stewart, Kelly v. USAA Review of our document production to be sent in Stewart matter (sent from Casim). (1.0). Provide additional help with the document production. (1.2).	Kyle W. Woodford	\$295.00	2.2	\$649.00			2.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
6/22/2021	7:30 AM	Stewart, Kelly v. USAA Review USAA's discovery responses in preparation for call with co-counsel (0.5); T/c with co-counsel reviewing USAA's discovery responses and which ones to pursue with opposing counsel and how, document review issues, issues with USAA's document production and what depositions to take (1.5); Email to opposing counsel re assorted discovery issues (0.2). Total 2.2.	Roger L. Mandel	\$950.00	2.2	\$2,090.00			2.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/24/2021	7:31 AM	Stewart, Kelly v. USAA Email with opposing counsel re USAA fixing document production and scheduling call on USAA's discovery responses. Total 0.1.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/29/2021	7:31 AM	Stewart, Kelly v. USAA T/c with T. Sanders and associate and E. Normand re resolving issues with USAA's discovery requests and timing of document production (1.6); Review email from expert about Covid exemptions on fees (0.1); Review email from E. Normand re including emission fees in claims (0.1). Total 1.8	Roger L. Mandel	\$950.00	1.8	\$1,710.00			1.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/29/2021	6:00 PM	Stewart, Kelly v. USAA Reviewed of emails re emission claim.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/7/2021	8:07 AM	Stewart, Kelly v. USAA Email with co-counsel re setting up call on case status and discovery (0.1); Email with co-counsel re who will need Disco access and C. Neff re providing (0.1); Email with C. Neff preliminary review of documents and follow up with USSA on any production issues (0.1); Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/7/2021	6:01 PM	Stewart, Kelly v. USAA Reviewed emails and responded.	Scott R. Jeeves	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/8/2021	8:08 AM	Stewart, Kelly v. USAA T/c with C. Neff re possible problems with USAA production and ingesting into Disco and performing preliminary review so we can determine how many reviewing coders we need Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/9/2021	8:08 AM	Stewart, Kelly v. USAA T/c with C. Neff re his success and ingesting and his preliminary review of production preliminary to call with all co-counsel (0.2); T/c with co-counsel status of discovery, document review, follow up on conference on discovery deficiencies with opposing counsel, deposition strategy and scheduling and extending scheduling order (0.7); Email to opposing counsel re all of same (0.4); Email with J. Taylor re invoice from Normand firm for expenses (0.1). Total 1.2.	Roger L. Mandel	\$950.00	1.2	\$1,140.00			1.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/13/2021	8:09 AM	Stewart, Kelly v. USAA Review email from opposing counsel responding on multiple discovery issues and email to co-counsel re same (0.3); Follow up email with co-counsel (0.1). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/14/2021	8:11 AM	Stewart, Kelly v. USAA Review revised proposed new schedule received from co-counsel and email to opposing counsel re same. Total 0.1.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/16/2021	8:11 AM	Stewart, Kelly v. USAA Review email from opposing counsel proposing more extended schedule and email with co-counsel re same. Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
7/21/2021	8:12 AM	Stewart, Kelly v. USAA Email with co-counsel re drafting joint motion and agreed order to extend case deadlines (0.2); Review lengthy email from opposing counsel re USAA's responses re outstanding discovery issues and supplemental interrogatory and request for production responses and compare to original and email with co-counsel re generally satisfactory nature of response and decision not to file motion to compel at the present time (1.4); Email with co-counsel re supplemental document production (0.1); T/c and email with C. Neff re document ingestion and review (0.2). Total 1.9.	Roger L. Mandel	\$950.00	1.9	\$1,805.00			1.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/23/2021	8:12 AM	Stewart, Kelly v. USAA Further email with co-counsel re drafting motion to extend deadlines (0.1); Email with co-counsel re list of tags for document review and obtaining training on Disco (0.1). Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/27/2021	8:15 AM	Stewart, Kelly v. USAA Review and revise Joint Motion and Agreed Order to Amend Level 3 Discovery Plan order received from A. Judkins (0.9); Email to opposing counsel re same (0.2). Total 1.1.	Roger L. Mandel	\$950.00	1.1	\$1,045.00			1.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/29/2021	8:15 AM	Stewart, Kelly v. USAA Email and t/c with T. Sanders, opposing counsel, re motion and order to amend discovery control order (0.2); Final review and revision of motion and order (0.3); Email to Judge Haas sending him file-stamped motion and two version of agreed order (0.2: Review signed order from Judge and email to opposing counsel re same and re providing deposition dates (0.1). Total 0.8.	Roger L. Mandel	\$950.00	0.8	\$760.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/29/2021	4:59 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Amended Discovery Order.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/1/2021	10:50 AM	Stewart, Kelly v. USAA Review new language on USAA claim portal and email with co-counsel re possible effect on our claims. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/2/2021	10:50 AM	Stewart, Kelly v. USAA Email with E. Normand re meaning of portal language and lack of effect on TTL and dealer fee claims. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/13/2021	10:50 AM	Stewart, Kelly v. USAA Review email for opposing counsel offering claim representative depositions and email with co-counsel re same. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/14/2021	10:51 AM	Stewart, Kelly v. USAA Review email from C. Neff summarizing his review process and overall impressions of USAA's document production and attached spreadsheet and email in response asking questions. Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/21/2021	10:51 AM	Stewart, Kelly v. USAA Email to co-counsel re identifying who will take depositions and aid in document selection and related issues (0.2); Email to opposing counsel asking if claim representative depositions can be considered limited corporate representative depositions (0.2); Review allegations of amended complaint previous discovery negotiations and email to T. Sanders following up on discovery issues (0.4). Total 0.8.	Roger L. Mandel	\$950.00	0.8	\$760.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
8/21/2021	5:01 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re depositions, etc.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/23/2021	10:51 AM	Stewart, Kelly v. USAA Review notices of depositions sent by co-counsel (0.2); Email with co-counsel re withdrawing same and trying to treat depositions as corporate representative depositions and who will take depositions and who will defend client depositions (0.2); Email w/ opposing counsel re deposition scheduling of their witnesses and named plaintiffs and supplemental document production by plaintiffs (0.2); Email with co-counsel re all of same and issues with one corporate representative and trying for early settlement on CRA issues (0.8); T/c with C. Neff re preparing supplemental documents for production through Disco, further review of documents produced by USAA and preparing a policies summary based on the documents (0.2); Review supplemental client documents to be produced (0.3). Total 1.9.	Roger L. Mandel	\$950.00	1.9	\$1,805.00			1.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/25/2021	10:52 AM	Stewart, Kelly v. USAA Email with E. Normand re his call with opposing counsel re settling CRA portion of suit. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/25/2021	5:03 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re phone call with OC.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/26/2021	10:52 AM	Stewart, Kelly v. USAA Email with opposing counsel and co-counsel re agreement that claim reps will be corporate representatives for those claims and opposing counsel's request to reschedule and tentative weeks for the rescheduling. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/27/2021	10:52 AM	Stewart, Kelly v. USAA Review email from C. Neff re supplemental production to be made, review production, and email to him approving same Total 0.5.	Roger L. Mandel	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/27/2021	5:05 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re production.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/1/2021	1:01 PM	Stewart, Kelly v. USAA Email with co-counsel re status of JPA and whether fully executed. Total 0.1.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/1/2021	5:06 AM	Stewart, Kelly v. USAA Reviewed and responded to Emails re spreadsheets and discovery.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/3/2021	1:19 PM	Stewart, Kelly v. USAA Review email from C. Neff re review of USAA documents and policies of USAA re payment of CRA and various fees as revealed by documents and spreadsheet of documents reviewed (0.5); Email with C. Neff and E. Normand re CRA policies and what claims we are making re same (0.2). Total 0.7.	Roger L. Mandel	\$950.00	0.7	\$665.00			0.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/3/2021	5:08 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re CRA polies, et al.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
9/8/2021	1:19 PM	Stewart, Kelly v. USAA Email with co-counsel re USAA paying CRA on sales tax, whether it makes sense to pursue claim for CRA on title/license fees, problems with Stewart, dismissing Stewart and CRA claim and permission received from Stewart. Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/8/2021	5:09 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re sales tax etc.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/14/2021	1:20 PM	Stewart, Kelly v. USAA Review email re schedule of USAA adjuster depositions and email with S. Jeeves re us sitting second chair. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/14/2021	5:10 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Depositions.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/18/2021	1:21 PM	Stewart, Kelly v. USAA Email with co-counsel re connecting persons taking adjuster depositions with primary document reviewer and form of depositions. Total 0.1.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/18/2021	5:11 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re depositions.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/20/2021	1:22 PM	Stewart, Kelly v. USAA Further Email with co-counsel re connecting persons taking adjuster depositions with primary document reviewer (0.1); Review and revise deposition notices for adjusters (0.8). Total 0.9.	Roger L. Mandel	\$950.00	0.9	\$855.00			0.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/20/2021	5:02 PM	Stewart, Kelly v. USAA Multiple emails to Devi Ramprasad on the notice for defendant's 30(b)(6) deposition.	Kyle W. Woodford	\$295.00	0.4	\$118.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/20/2021	5:11 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re depositions.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/21/2021	1:23 PM	Stewart, Kelly v. USAA Review final versions of four deposition notices served on opposing counsel by co-counsel. Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/24/2021	1:24 PM	Stewart, Kelly v. USAA Review petition, rules of civil procedure on motions to non-suit, O'Connor's commentary on methods to dismiss parties and lengthy email to co-counsel re further pursuing settlement discussions on CRA before dismissing Stewart and dismissing her via omission form an amend petition that would keep alive the CRA claim with the other plaintiffs as class representatives on that claim. Total 1.5.	Roger L. Mandel	\$950.00	1.5	\$1,425.00			1.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
9/27/2021	1:24 PM	Stewart, Kelly v. USAA Email with co-counsel re possible CRA settlement and plan for dismissing Stewart and possibly keeping CRA suit alive. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/27/2021	5:12 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re possible CRA settlement.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/6/2021	12:35 PM	Stewart, Kelly v. USAA Email with co-counsel and opposing counsel re deposition scheduling (0.2); Email with E. Normand re USAA lack of interest on CRA settlement since they pay it on sales tax and whether to drop CRA claim altogether in amended complaint dropping Stewart (0.3). Total 0.5.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/6/2021	5:13 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re dropping CRA claim.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/7/2021	12:36 PM	Stewart, Kelly v. USAA Email with co-counsel re downloading latest USAA document production into Disco and coding and adding to document summary and reviewing for use in depositions. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/7/2021	5:14 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re discovery.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/11/2021	12:36 PM	Stewart, Kelly v. USAA Email with opposing counsel re dropping Stewart and effect on depositions and email with co-counsel re same and whether to also drop CRA claim or keep it with remaining plaintiffs. Total 0.5.	Roger L. Mandel	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/11/2021	5:15 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re dropping Stewart.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/15/2021	12:37 PM	Stewart, Kelly v. USAA Email with co-counsel re document review needed for deposition preparation and deposition scheduling (0.4); Email re availability of documents in Disco with co-counsel (0.1). Total 0.5.	Roger L. Mandel	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/15/2021	5:16 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re document review.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/18/2021	12:37 PM	Stewart, Kelly v. USAA Email with co-counsel re USAA now having produced spreadsheet of total loss insureds and what information it contains and number of class members so far and potential damages (0.3); Email and t/c with co-counsel re dropping Stewart by amendment not nonsuit and whether to include CRA claims in amended complaint (0.6); Review and revise second amend complaint (3.6). Total 4.5.	Roger L. Mandel	\$950.00	4.5	\$4,275.00			4.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
10/18/2021	5:16 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re spreadsheet etc.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/19/2021	12:38 PM	Stewart, Kelly v. USAA Email with co-counsel re revisions to Second Amended Complaint and adding exclusions to class definition (0.3); Email with co-counsel re putting together list of deficiencies in document production to notify USAA counsel about (0.2); Review exhibits to be used for first adjuster deposition and email with co-counsel re that (0.3). Total 0.8	Roger L. Mandel	\$950.00	0.8	\$760.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/19/2021	5:18 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Second Amended Complaint. Reviewed Second Amended Complaint.	Scott R. Jeeves	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/20/2021	12:38 PM	Stewart, Kelly v. USAA Email with co-counsel re who will be taking corporate representative depositions, especially database deposition (0.3); Review co-counsel summary of first adjuster deposition and email re same and re expert needs in case (0.3); email with co-counsel re lack of production of database-related documents and checking previous document response deficiency negotiations to see if covered before (0.3); Email with co-counsel re lining up dealer fee expert (0.2). Total 1.1.	Roger L. Mandel	\$950.00	1.1	\$1,045.00			1.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/20/2021	2:18 PM	Stewart, Kelly v. USAA Attended Deposition of Sherise Payne-Robinson.	Scott R. Jeeves	\$650.00	2	\$1,300.00			2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/24/2021	12:39 PM	Stewart, Kelly v. USAA Email with co-counsel re possible need for inspection fee expert and locating one, including potentially using Expert Institute and getting TMDV registration data already in our hands to dealer fee expert to see if it meets his needs and re getting estimate form him. Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/24/2021	5:19 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re possible need for inspection.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/25/2021	12:46 PM	Stewart, Kelly v. USAA Attended Deposition of Adjuster Jennifer Porter.	Scott R. Jeeves	\$650.00	2.5	\$1,625.00			2.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/26/2021	12:39 PM	Stewart, Kelly v. USAA Emails to E. Normand re status of amended complaint and supplying information on vehicle purchase data already obtained through vendor (0.1); Follow up email with him re review and revision of amended complaint and provision of information (0.2); T/c with potential expert T. Stockton re performing dealer fee analysis (0.2); Final review and revision of Second Amended Complaint (1.0). Total 1.5.	Roger L. Mandel	\$950.00	1.5	\$1,425.00			1.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/26/2021	5:20 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Amended Complaint.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/27/2021	12:40 PM	Stewart, Kelly v. USAA Confirm identity of document that is exhibit A to Complaint and email with staff re same (0.1); Review data excerpts received from E. Normand and email with him re need for information on source of data and additional excerpts in order to obtain expert estimate (0.3). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
10/27/2021	5:14 PM	Stewart, Kelly v. USAA Review of our second amended petition.	Kyle W. Woodford	\$295.00	0.9	\$265.50			0.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/27/2021	5:21 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Amended Complaint.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/28/2021	12:48 PM	Stewart, Kelly v. USAA Attended Deposition of Gabrielle Lombana.	Scott R. Jeeves	\$650.00	1.5	\$975.00			1.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/28/2021	12:40 PM	Stewart, Kelly v. USAA Email with co-counsel re \$5 fee charged by dealers to customers for temporary paper tags, internet research re same and email with co-counsel re which expert should testify about it (0.7); Email with co-counsel and data expert re date range of data currently in our possession and its identification of private sales and review data excerpt re same (0.3); Email to T. Stockton, dealer fee experts, confirming need for estimate, setting forth parameters of assignment and send excerpt (0.2); Email with co-counsel re whether to use our law clerks or for expert to hire temps to conduct survey (0.2); Email and t/c with T. Stockton about what else we need to know about existing data to determine if sufficient for his purposes (0.3); Email with co-counsel and data expert re questions about existing data (0.2); T/c with data vendor About the issues on the data (0.3); Follow up email with co-counsel and data expert after that (0.2); Email with co-counsel re nature of inspection fees, whether they are uniform and whether expert need regarding them (0.3). Total 2.7.	Roger L. Mandel	\$950.00	2.7	\$2,565.00			2.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/29/2021	12:41 PM	Stewart, Kelly v. USAA Further email with co-counsel re nature of inspection fees, whether expert needed, process for finding expert and one expert candidate (0.7); Email with T. Stockton re sufficiency of data and information on sources of data and proof of authenticity/accuracy (0.3); T/c with A. Faith from vendor re same and review document re process he provided) (0.4); Email with co-counsel re finding and providing to T. Stockton previous declaration from Faith (0.2);	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/29/2021	5:22 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re nature of inspection.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/1/2021	9:20 AM	Stewart, Kelly v. USAA T/c with T. Stockton re procedures and costs involved for dealer fees analysis (0.2); Email and t/c with S. Jeeves re same (0.2). Total 0.4	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/2/2021	9:21 AM	Stewart, Kelly v. USAA Review file-stamped version of second amended complaint and email to K. Hill re circulating to team. Total 0.2	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/5/2021	9:21 AM	Stewart, Kelly v. USAA Email to experts and legal team re T. Stockton explaining assignment on dealer fees and requesting others to share necessary documentation for assignment. Total 0.5	Roger L. Mandel	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/5/2021	5:23 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re experts.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
11/9/2021	9:22 AM	Stewart, Kelly v. USAA Email with opposing counsel re the second amended complaint dropping Stewart and re his request for production of attorney-client agreements and pre-suit communication involving client (0.5); Email with co-counsel re same and possible production of attorney-client agreements (0.5). Total 1.0	Roger L. Mandel	\$950.00	1	\$950.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/9/2021	5:25 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re second amended complaint.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/10/2021	8:29 AM	Stewart, Kelly v. USAA T/c w/ T. Stockton re us proposing amended dealer fees subclass definition and new analyses to run in connection with same and estimate of his sending first draft of declaration and review and respond to his email to staff re the new analyses. Total 0.5	Roger L. Mandel	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/12/2021	9:24 AM	Stewart, Kelly v. USAA Review compiled attorney-client agreements and email to C. Neff re ingesting into Disco and producing. Total 0.2	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/15/2021	9:25 AM	Stewart, Kelly v. USAA Review email from opposing counsel requesting production before deposition the next day and email with C. Neff re production. Total 0.3	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/15/2021	5:25 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re production/deposition.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/16/2021	9:25 AM	Stewart, Kelly v. USAA Email with co-counsel and opposing counsel re reproducing agreements with version marked confidential and destroying prior versions (0.2); Attend part of Plaintiff Arevalo deposition (2.5); T/c with co-counsel re her answers and documents and possible adequacy problems, noticing and taking corporate representative depositions before deadlines, Texas deposition rules and drafting of class certification motion (0.6); Email with co-counsel re locating expert on emissions testing cost expert and potential alternatives (0.3); Research re counties setting fees and summary prepared by DPS and email with co-counsel re tracking down amounts on county websites and giving to existing expert (0.4); Research re Texas deposition rule and email w/ co-counsel re same (0.3). Total 4.3	Roger L. Mandel	\$950.00	4.3	\$4,085.00			4.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/16/2021	5:26 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re exhibits.	Scott R. Jeeves	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/17/2021	9:26 AM	Stewart, Kelly v. USAA Email with co-counsel re issues with client Simon in preparing for his deposition and tactics for further preparation (0.2); Review email from opposing counsel re need for specificity on corporate representative topics and inability to provide before current discovery deadline and email re same with co-counsel and prepare topic list (0.2); Email with co-counsel re us providing them Simon document production (0.1); T/c with opposing counsel re them preparing initial draft of motion from class certification on Regulatory Fees and me adding dealer fees and Texas research and forms we will provide and re deposition topics (0.6). Total 1.1	Roger L. Mandel	\$950.00	1.1	\$1,045.00			1.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/17/2021	5:27 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re depo prep with clients.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
11/18/2021	9:27 AM	Stewart, Kelly v. USAA	Roger L. Mandel	\$950.00	1.2	\$1,140.00			1.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Review proposed deficiency letter to opposing counsel re failure to produce hyperlinked documents prepared by C. Neff and email with co-counsel re same (0.5); Review topics used by co-counsel for corporate representative depositions in another total loss case and email with co-counsel re issues with same and proceeding with draft in this case (0.6); T/c with E. Calhoun re sharing class certification briefing we did in prior case that we can use as model in this case (0.1). Total 1.2										
11/19/2021	5:16 PM	Stewart, Kelly v. USAA	Kyle W. Woodford	\$295.00	0.6	\$177.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Edits to Draft Proposed Order on Pltf(s) Unopposed Motion for Extension.										
11/19/2021	9:27 AM	Stewart, Kelly v. USAA	Roger L. Mandel	\$950.00	2	\$1,900.00			2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Email with co-counsel re providing studies on emission fees to Stockton and having him testify that they can be calculated based on same. Total 0.2										
11/19/2021	5:28 AM	Stewart, Kelly v. USAA	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Reviewed and responded to emails re providing studies.										
11/22/2021	9:28 AM	Stewart, Kelly v. USAA	Roger L. Mandel	\$950.00	1.5	\$1,425.00			1.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Review prior briefing on class certification in Texas state court (0.5); T/c with K. Woodford re updating research on Texas standards and looking for case on certification under insurance code and follow up email with him re his findings (0.3); Lengthy email to co-counsel re prior Texas briefing and summary of arrangement on preparation of class certification motion (0.3); T/c with K. Woodford re preparing corporate representative dealer fee topics (0.1); T/c with T. Stockton re his reviewing emissions testing fee surveys and possibly testifying based on that and re dealer fee survey (0.3). Total 1.5										
11/22/2021	5:30 AM	Stewart, Kelly v. USAA	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Reviewed and responded to emails re briefing.										
11/23/2021	4:59 PM	Stewart, Kelly v. USAA	Kyle W. Woodford	\$295.00	2	\$590.00			2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Send final draft of dealer fee topics to RLM for approval to send to co-counsel.										
11/23/2021	9:28 AM	Stewart, Kelly v. USAA	Roger L. Mandel	\$950.00	1.6	\$1,520.00			1.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Review dealer fee topics prepared by K. Woodford and t/c with him re revisions to same and sending to co-counsel (0.6); Review of new Texas class certification opinions found by K. Woodford (0.8); Review database corporate representative deposition notice served bu co-counsel on opposing counsel (0.2). Total 1.6										
11/23/2021	9:29 AM	Stewart, Kelly v. USAA	Roger L. Mandel	\$950.00	1.6	\$1,520.00			1.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Review and revise proposed corporate representative notice and add additional section of topics related to insurance code bad faith claim (2.1); Email with opposing counsel re extension of time for witness to read and sign (0.1). Total 2.2										
11/23/2021	5:31 AM	Stewart, Kelly v. USAA	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Reviewed and responded to emails re proposed corp rep notices.										

<i>Date</i>	<i>Time</i>	<i>Case Name</i> <i>Explanation</i>	<i>User</i>	<i>Hourly</i> <i>Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours</i> <i>Worked</i>	<i>Billable</i> <i>Time</i>	<i>Billed</i>	<i>Billed</i> <i>Date</i>
11/24/2021	6:00 PM	Stewart, Kelly v. USAA Legal research on Texas class certification standards, pull and highlight cases, draft small memo, and send everything to our entire team.	Kyle W. Woodford	\$295.00	5	\$1,475.00			5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/30/2021	9:29 AM	Stewart, Kelly v. USAA Review notice from Court re hearing in morning, t/c with K. Woodford and joint review of pleadings to determine how this came to be sent in error, t/c's with opposing counsel re same and re contacts with court, and email to court clerk re same and follow up email with opposing counsel re same (1.3); Review proposed motion and order for extension of schedule received from co-counsel and email to them re suggested changes (0.6). Total 1.9	Roger L. Mandel	\$950.00	1.9	\$1,805.00			1.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/1/2021	11:31 AM	Stewart, Kelly v. USAA Email with court clerk re new date for status conference and time and whether by Zoom (0.1); Email with co-counsel re problems with client Micah Simon and preparing him for deposition (0.2); T/c with co-counsel re logistics for Simon deposition and best method of preparing him (0.3); Lead final preparation of Simon for deposition along with co-counsel (1.5). Total 2.1.	Roger L. Mandel	\$950.00	2.1	\$1,995.00			2.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/1/2021	5:32 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re status conference date.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/2/2021	11:31 AM	Stewart, Kelly v. USAA Review exhibits for Simon deposition provided in advance by opposing counsel (0.8); T/c re same with co-counsel and arrangements for deposition (0.3); T/c with co-counsel and client Micah Simon to review exhibits and prepare for deposition (1.0); Attend Simon deposition and confer with co-counsel on breaks, including redirect questions (2.0); Text with co-counsel re follow up with client's mother re his memory issues and need to and timing on amending interrogatory answers (0.2). Total 4.4.	Roger L. Mandel	\$950.00	4.4	\$4,180.00			4.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/3/2021	11:32 AM	Stewart, Kelly v. USAA Email with opposing counsel, co-counsel and court reporter regarding exhibits (0.2); Email to A. Judkins re importance of payment screens produced re Simon and need for call to discuss importance for discovery (0.1); Review similar documents for 2 of Arevalo's 3 claims provided by A. Judkins and email re time for setting up calls and what asked about documents in depositions (0.3); T/c with C. Neff re follow up on sending deficiency letter to opposing counsel and sending emissions fee surveys to expert, T. Stockton (0.2); Final review and approval of letter (0.2); T/c with A. Judkins re sending frontline adjuster depositions and ways to ask about payment screens in corporate representative depositions and need to update disclosures and interrogatory answers and use of experts for same (0.6); Review email from C. Neff to T. Stockton sending ERG reports on emissions testing prices, preliminary review of reports, and t/c with C. Neff re where certain information is located in reports and further research needed re difference between ADM and ORD tests and determining what decides which test is used and sending class spreadsheet to Stockton so he can determine what necessary information is missing (1.8); Email to T. Stockton re reports and possible opinions and determining sufficiency of information (0.2). Total 3.6.	Roger L. Mandel	\$950.00	3.6	\$3,420.00			3.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/3/2021	5:33 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re exhibits.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/5/2021	11:32 AM	Stewart, Kelly v. USAA Review email from C. Neff to T. Stockton re research on ADM vs OBD tests and how to account for same in damages calculations and attached documents (0.8); Email with T. Stockton re preliminary decisions we need and possible ultimate possible opinions (0.3). Total 1.1.	Roger L. Mandel	\$950.00	1.1	\$1,045.00			1.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
12/6/2021	11:33 AM	Stewart, Kelly v. USAA Review USAA's objections to deposition notice for database witness (0.2); Email to co-counsel re responding to opposing counsel re objections (0.1); Review and revise latest versions of motion and order to amend discovery control order and t/c and email with staff re filing same (0.4); Email with co-counsel re expiration of class discovery period and follow up on update of spreadsheet (0.2); T/c and email with T. Stockton re additional items needed in spreadsheet of total loss claims and problems with data already received for dealer fee analysis and using HIS data instead (0.6); Email with co-counsel re checking production on certain screen shots re class representatives and drafting deficiency letter re that and re deficiencies in total loss claim spreadsheet; Review, revise and add to second deficiency letter draft received from C. Neff (0.8). Total 2.3.	Roger L. Mandel	\$950.00	2.3	\$2,185.00			2.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/6/2021	4:58 PM	Stewart, Kelly v. USAA Review of Prior Emissions Studies to Opine on Emission Fee Amount.	Kyle W. Woodford	\$295.00	0.8	\$236.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/6/2021	5:34 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re objections to depo notices.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/7/2021	11:33 AM	Stewart, Kelly v. USAA Review lengthy email and backup documents providing backup information to studies on emissions testing received from C. Neff (0.9); Email with co-counsel re other items to add to second deficiency letter re spreadsheet (0.3); Further review, revise and add to second deficiency letter (1.1); Review emails from opposing counsel re scheduling meet and confer on discovery issue (0.1). Total 2.4.	Roger L. Mandel	\$950.00	2.4	\$2,280.00			2.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/8/2021	11:35 AM	Stewart, Kelly v. USAA Email with opposing counsel and co-counsel re scheduling call and re motion and order already filed and will need amendment and likely postponement of depositions (0.3); Zoom conference with T. Sanders, opposing counsel, and C. Neff re resolution of discovery issues, need to amend motion and order and letting court know about same and possible schedule (0.5); Follow up email to T. Sanders summarizing call (0.2); Email to co-counsel re cancelling deposition (0.1). Total 0.9.	Roger L. Mandel	\$950.00	0.9	\$855.00			0.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/8/2021	5:35 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re phone call with Co-Counsels.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/10/2021	11:35 AM	Stewart, Kelly v. USAA T/c with T. Sanders re timing on additional discovery and emailing Judge not to sign proposed order and plan going forward (0.3); Draft proposed email to court and email to T. Sanders to review same (0.3); Review email from Sanders re same and make one correction to email to Judge and send to Judge (0.2); Email with co-counsel re cancelling depositions (0.1). Total 0.6.	Roger L. Mandel	\$950.00	0.6	\$570.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/17/2021	11:36 AM	Stewart, Kelly v. USAA Email with T. Stockton re issue with Texas His data and how it was resolved and extension of case deadlines. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/17/2021	5:35 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re expert availability.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/27/2021	11:36 AM	Stewart, Kelly v. USAA Email with co-counsel that Court has stated it will wait for new scheduling order in January (0.1); Email to opposing counsel re status of supplemental document production by USAA (0.1). Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name</i> <i>Explanation</i>	<i>User</i>	<i>Hourly</i> <i>Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours</i> <i>Worked</i>	<i>Billable</i> <i>Time</i>	<i>Billed</i>	<i>Billed</i> <i>Date</i>
12/27/2021	5:36 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re scheduling Order and Court.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/29/2021	4:10 PM	Stewart, Kelly v. USAA Review, read, and highlight deposition of Jennifer Porter.	Kyle W. Woodford	\$295.00	1	\$295.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/29/2021	7:11 PM	Stewart, Kelly v. USAA Review, read, and highlight deposition of Micah Simon.	Kyle W. Woodford	\$295.00	1	\$295.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/30/2021	11:37 AM	Stewart, Kelly v. USAA Review email from opposing counsel re status of USAA's supplemental document production and offer dates from corporate representative depositions and email in response and email to co-counsel re same (0.3); Review emails from opposing counsel regarding supplemental document production and emails to C. Neff re ingesting into Disco and reviewing and coding same (0.2). Total 0.5.	Roger L. Mandel	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/30/2021	5:37 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re supplemental documents.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/3/2022	2:56 PM	Stewart, Kelly v. USAA T/c with C. Neff re ingesting, reviewing and coding latest USAA document production. Total 0.1.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/6/2022	2:56 PM	Stewart, Kelly v. USAA Review notices of filings by USAA of reporter's certificates for clients' depositions and email to co-counsel re us doing same for depositions we have taken (0.1); Email with opposing counsel, T. Sanders, repreparing new amended scheduling order (0.1); Review Fontana invoice and t/c with S. Jeeves re payment of same and asking for co-counsel true up (0.2); Email to staff re payment of invoice an true-up (0.1); Email to co-counsel re invoice and need for true-up (0.2); Email to T. Stockton re payment of invoice and status of his work (0.1); T/c with T. Stockton re status of his work and preliminary results (0.3). Total 1.1.	Roger L. Mandel	\$950.00	1.1	\$1,045.00			1.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/6/2022	4:18 PM	Stewart, Kelly v. USAA Look for overdraft article for a case that is also in Bexar county.	Kyle W. Woodford	\$295.00	0.3	\$88.50			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/6/2022	5:38 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Notice of filing Court Reporter Certificates.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/8/2022	2:57 PM	Stewart, Kelly v. USAA Review second December Fontana invoice and email with S. Jeeves re how to handle and finding out cap. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/11/2022	2:57 PM	Stewart, Kelly v. USAA Email with t. Stockton and S. Jeeves re estimate for Stockton work on case (0.1); Review and revise proposed amended discovery control order received from T. Sanders and email to co-counsel re same (0.3); Email with T. Sanders re possibly adding mediation to order (0.1). Total 0.5.	Roger L. Mandel	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
1/11/2022	5:44 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Stockton.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/12/2022	10:16 AM	Stewart, Kelly v. USAA Edit and email to Janna Sherwood our draft motion for extension of time.	Kyle W. Woodford	\$295.00	0.5	\$147.50			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/14/2022	2:57 PM	Stewart, Kelly v. USAA Review expenses received from Normand Group, calculate split between the three groups and how much other groups owe us and email to them re same and follow up email with them re same (0.7); Email with staff and T. Stockton re payment of his invoice (0.1); Email with T. Stockton re new schedule and when declaration due and when work will need to commence again (0.1); Email with co-counsel re possibility of subclass and/or pleading alternative means of proof for class certification on dealer fees (0.5); Review email from opposing counsel re supplemental document production and email to C. Neff re ingesting into Disco and coding (0.1); Email to opposing counsel re revisions to amended discovery control order (0.1). Total 0.9.	Roger L. Mandel	\$950.00	0.9	\$855.00			0.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/15/2022	2:58 PM	Stewart, Kelly v. USAA T/c w/ S. Jeeves re possibility of subclass and/or pleading alternative means of proof for class certification on dealer fees. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/15/2022	5:45 AM	Stewart, Kelly v. USAA T/C with R. Mandel re possible subclass.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/17/2022	2:58 PM	Stewart, Kelly v. USAA Email with co-counsel re strategy for class certification on dealer fees and settlement prospects and strategy (0.2); Email with co-counsel re expense true up (0.1). Total 0.3	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/17/2022	5:46 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re strategy.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/18/2022	3:07 PM	Stewart, Kelly v. USAA Review email from opposing counsel approving proposed changes to order, accept changes and final review and revision (0.2); Email to Judge Haas transmitting proposed order (0.1). Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/18/2022	5:47 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re proposed changes to the order.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/20/2022	3:08 PM	Stewart, Kelly v. USAA Review USAA's objections to deposition notice and topics for deposition of corporate representative on practices and procedures (0.3); Email to co-counsel re setting up call with opposing counsel to discuss (0.1). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
1/21/2022	3:08 PM	Stewart, Kelly v. USAA Email with co-counsel and opposing counsel re scheduling call (0.2); Review email from C. Neff re his review of new documents produced by USAA and review his updated document summary spreadsheet and email with him re whether USAA has produced the missing hyperlinked documents such as charts of sales tax and fees and re sending new class spreadsheet to expert, T. Stockton (0.4). Total 0.6.	Roger L. Mandel	\$950.00	0.6	\$570.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/21/2022	5:47 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re scheduling a phone call.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/22/2022	3:09 PM	Stewart, Kelly v. USAA Review two document production deficiency letters and two production emails and email w/ C. Neff re comparing letters to the two productions and determining documents that should have been but have not been produced. Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/24/2022	3:30 PM	Stewart, Kelly v. USAA Email with A. Judkins and C. Neff re missing documents and preparing draft email for me to send to opposing counsel (0.3); Review email from C. Neff to experts ending part of class spreadsheet and asking for confirmation it contains all fields necessary for expert's work and follow up email w/ expert's office about what claims the spreadsheets contain, meanings of various fields and inquiries that will be made during database deposition (0.3). Total 0.6.	Roger L. Mandel	\$950.00	0.6	\$570.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/24/2022	5:48 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re missing documents.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/25/2022	3:30 PM	Stewart, Kelly v. USAA Review USAA's objections to topics for the database deposition (0.2); Email to opposing counsel re discussing them at scheduled call and re USAA's failure to produce certain agreed upon documents (0.2); Review email from expert re information in spreadsheet and identifying questions that need to be answered and follow up email with expert re those issues and efforts to conclusively resolve them with USAA and regarding the need for analysis of the payments shown in the spreadsheet (0.8). Total 1.2.	Roger L. Mandel	\$950.00	1.2	\$1,140.00			1.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/26/2022	3:31 PM	Stewart, Kelly v. USAA Zoom conference with opposing counsel and co-counsel to resolve document production issues and objections to deposition topics (1.0); T/c with A. Judkins re topics and documents to cover during policies and procedures deposition (0.2); Email with co-counsel and expert re issues with spreadsheet (0.1); Review emails from opposing counsel re new document production, email in response asking about contents and email to C. Neff re ingesting into Disco and reviewing (0.2). Total 1.5.	Roger L. Mandel	\$950.00	1.5	\$1,425.00			1.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/26/2022	10:31 AM	Stewart, Kelly v. USAA Zoom conference with opposing counsel to discuss document/discovery issues.	Kyle W. Woodford	\$295.00	1	\$295.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/26/2022	10:33 AM	Stewart, Kelly v. USAA Legal research on non taxable costs for this matter.	Kyle W. Woodford	\$295.00	1.2	\$354.00			1.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/27/2022	3:31 PM	Stewart, Kelly v. USAA Email with A. Judkins and S. Jeeves re S. Jeeves second chairing policy and practices corporate representative deposition (0.2); Email with C. Neff re identifying in his document review what additional fees now being paid (0.2); Review email from C. Neff summarizing latest document production and his updated document summary chart (0.3); Review revised deposition notice and email to staff re calendaring (0.1). Total 0.8.	Roger L. Mandel	\$950.00	0.8	\$760.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
1/27/2022	5:50 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re polices and practices.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/28/2022	3:33 PM	Stewart, Kelly v. USAA Zoom with C. Rothburd and S. Jeeves re strategy for class certification on dealer fees and costs for expert in connection with same (0.5); Review emails from opposing counsel re additional production and email to c. Neff re same (0.1); Email with C. Neff re contents of latest production and sending data glossary to expert (0.1); Review data dictionary (0.1); Email with co-counsel re discussing topics raised by dictionary for policies and procedures witness and setting time for call (0.1); Email with experts re data dictionary and whether updated spreadsheet combined with that is adequate for their work and additional questions they would like asked of the database witness (0.3); Email with C. Neff re follow up with opposing counsel on redactions (0.1). total 1.3.	Roger L. Mandel	\$950.00	1.3	\$1,235.00			1.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/28/2022	5:51 AM	Stewart, Kelly v. USAA Zoom meeting with R. Mandel and C. Rothburd re stratagy.	Scott R. Jeeves	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/30/2022	8:46 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re status conference.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/31/2022	3:33 PM	Stewart, Kelly v. USAA Email with S. Jeeves re having research done on whether expert fees are taxable costs. Total 0.1	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/31/2022	5:52 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re research.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/1/2022	4:31 PM	Stewart, Kelly v. USAA Review legal research concluding expert fees are not taxable costs. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/3/2022	3:51 PM	Stewart, Kelly v. USAA Review updated class spreadsheet.	Kyle W. Woodford	\$295.00	0.5	\$147.50			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/4/2022	4:31 PM	Stewart, Kelly v. USAA Second chair database deposition and t/c during same with J. Phillips re topics (0.8); Email with dealer fee expert and J. Philips re questions about class spreadsheet (0.2); Review email from co-counsel to reporter re exhibits and check same (0.2). Total 1.2.	Roger L. Mandel	\$950.00	12	\$11,400.00			12	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/7/2022	4:32 PM	Stewart, Kelly v. USAA Review USAA objections to topics for policies and practices deposition. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/8/2022	4:32 PM	Stewart, Kelly v. USAA T/c with A. Judkins in advance of Nilson (policies and practices) deposition (0.2); Second chair Nilson deposition, including conferring w/ A. Judkins re questions during breaks (5.4). Total 5.6.	Roger L. Mandel	\$950.00	5.6	\$5,320.00			5.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
2/8/2022	4:03 PM	Stewart, Kelly v. USAA Review updated bill from Fontana Group.	Kyle W. Woodford	\$295.00	0.2	\$59.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/10/2022	5:53 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re documents and policies.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/10/2022	1:02 PM	Stewart, Kelly v. USAA Review email from C. Neff re review of USAA documents and policies of USAA re payment of CRA and various fees as revealed by documents and spreadsheet of documents reviewed (0.5); Email with C. Neff and E. Normand re CRA policies and what claims we are making re same (0.2). Total 0.7.	Roger L. Mandel	\$950.00	0.7	\$665.00			0.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/11/2022	4:33 PM	Stewart, Kelly v. USAA Review letter from opposing counsel re alleged deficiencies in document production (0.2); Email to co-counsel re them handling as they have client relationships (0.1). Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/17/2022	4:33 PM	Stewart, Kelly v. USAA Review email from opposing counsel re producing new class spreadsheet and email to C. Neff re ingesting into Disco. Total 0.1.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/17/2022	5:54 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re OC producing new spreadsheet.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/18/2022	4:34 PM	Stewart, Kelly v. USAA Review retainer agreement and expert report from our proposed insurance expert (0.8); Email with co-counsel re additional claims to move for certification on based on policies and practices deposition and need for insurance expert at class certification and scheduling conference re same (0.2). Total 1.0.	Roger L. Mandel	\$950.00	1	\$950.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/19/2022	4:34 PM	Stewart, Kelly v. USAA Review new version of class spreadsheet (0.3); Email with C. Neff re differences from prior version and sending to T. Stockton, our dealer fee expert (0.2); Email with co-counsel re T. Stockton status and expected results (0.1); Email to T. Stockton re new spreadsheet and differences from prior version (0.1); Email with co-counsel re scheduling conference (0.1). Total 0.8.	Roger L. Mandel	\$950.00	0.8	\$760.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/20/2022	4:35 PM	Stewart, Kelly v. USAA Email with co-counsel re including tax and other claims in motion for class certification and whether complaint is broad enough to cover same. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/20/2022	5:55 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re including tax and other claims.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/21/2022	4:35 PM	Stewart, Kelly v. USAA Email with co-counsel re scheduling conference (0.1); Review and revise draft response to deficiency letter received from A. Judkins, including review of requests and objections (1.2); Email with co-counsel re whether Simon has additional responsive documents (0.1). Total 1.4.	Roger L. Mandel	\$950.00	1.4	\$1,330.00			1.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
2/21/2022	5:56 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re scheduling conference.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/22/2022	4:36 PM	Stewart, Kelly v. USAA Email w/ T. Stockton re status of his analysis and when it will pick back up and different class to be certified on dealer fees than previous cases. (0.3); Email with S. Jeeves re topics for participation and his involvement in call (0.1); Zoom conference w/ co-counsel re strategy for class certification and supporting experts and re supplementing discovery and procedures for getting work done (1.4). Total 1.8.	Roger L. Mandel	\$950.00	1.8	\$1,710.00			1.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/22/2022	5:57 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Stockton.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/23/2022	4:36 PM	Stewart, Kelly v. USAA Review final letter from co-counsel responding to opposing counsel re alleged discovery deficiencies as served on opposing counsel. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/23/2022	10:35 AM	Stewart, Kelly v. USAA Final formatting and edits to amended interrogatories.	Kyle W. Woodford	\$295.00	0.4	\$118.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/23/2022	5:57 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re letter drafted by co-counsel re discovery deficiencies.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/24/2022	4:36 PM	Stewart, Kelly v. USAA Review and revise draft amended interrogatory answers received from A. Judkins for Arevalo and review client documents and previous responses in connection with doing so (2.2); Review opposing counsel's reply letter re discovery issues (0.2). Total 2.4.	Roger L. Mandel	\$950.00	2.4	\$2,280.00			2.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/24/2022	5:59 AM	Stewart, Kelly v. USAA Reviewed amended discovery answers.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/25/2022	4:37 PM	Stewart, Kelly v. USAA Review and revise latest version of amended Arevalo interrogatory answers and amended answers from Simon (1.4); Review service copies and email to co-counsel re issue with same (0.3); Review scheduling order and email with co-counsel that we cannot amend freely now (0.2); Review proposed responsive discovery letter from A. Judkins, t/c with her re revision to same and review service copy (0.2.) Total 2.1.	Roger L. Mandel	\$950.00	2.1	\$1,995.00			2.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/10/2022	5:33 AM	Stewart, Kelly v. USAA Email with co-counsel on timelines for drafting and contents of motion for class certification and supporting declarations and evidence (0.3); T/c with T. Stockton re status of and preliminary results of his analysis (0.2); Email to opposing counsel re possible agreement on expert work product not being discoverable (0.1). Total 0.6.	Roger L. Mandel	\$950.00	0.6	\$570.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/10/2022	6:00 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Status.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
3/11/2022	5:34 AM	Stewart, Kelly v. USAA Conference with co-counsel re status on class certification motion and support and re D. Thatcher reviewing all depositions for evidence related to dealer fees (0.2); Review file for deposition transcripts and email w/ co-counsel re providing missing transcripts and with D. Thatcher re same and with K. Hill re downloading (0.3); Email with E. Normand re T. Stockton not putting on opinions re amounts class members could have been expected to pay for emissions testing, but rather using the maximum statutory amounts which USAA has started paying and his expert can address (0.3); T/c w/ T. Stockton re same (0.1). Total 0.9.	Roger L. Mandel	\$950.00	0.9	\$855.00			0.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/11/2022	6:01 AM	Stewart, Kelly v. USAA Phone call with Co-Counsels re status; Reviewed and responded to emails re expert.	Scott R. Jeeves	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/11/2022	11:26 AM	Stewart, Kelly v. USAA Read emails on ethics issue and read response letter by Amy .	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/14/2022	5:34 AM	Stewart, Kelly v. USAA Email with opposing counsel re whether to agree to protect drafts and communications with expert from discovery and scheduling call to discuss scheduling order (0.1); Review Defendants' second supplemental discovery requests (0.7); Email w/ co-counsel re same (0.1). Total 0.9.	Roger L. Mandel	\$950.00	0.9	\$855.00			0.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/14/2022	6:03 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re discovery.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/15/2022	5:35 AM	Stewart, Kelly v. USAA Zoom conference with opposing counsel re discovery and scheduling issues, amendment of petition and potential for mediation (0.3); Email to co-counsel summarizing call (0.3); Email with E. Normand re potential mediators (0.2). Total 0.8.	Roger L. Mandel	\$950.00	0.8	\$760.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/15/2022	6:04 AM	Stewart, Kelly v. USAA Zoom meeting with OC re discovery.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/15/2022	4:55 PM	Stewart, Kelly v. USAA Review Defendant's supplemental objections and response to our Roggs, RFP's, RFD's, and unsworn declaration of Kyle Nielsen.	Kyle W. Woodford	\$295.00	2.8	\$826.00			2.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/15/2022	4:56 PM	Stewart, Kelly v. USAA Read RLM's summary of his call with USAA's lead counsel.	Kyle W. Woodford	\$295.00	0.2	\$59.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/21/2022	5:35 AM	Stewart, Kelly v. USAA Email with T. Stockton re current operative complaint, future amendments and their lack of relevance to his analysis. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/21/2022	6:05 AM	Stewart, Kelly v. USAA Reviewed and responded to emails with T. Stockton.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
3/22/2022	5:37 AM	Stewart, Kelly v. USAA Draft Rule 11 Agreement Regarding Expert Testimony (0.3); Email with opposing counsel re same and USAA's interest in scheduling a mediation (0.1); Review prior email from E. Normand re potential mediators and email to him requesting call re same (0.1); T/c and email with co-counsel re possible mediators (0.2); T/c with T. Stockton re issue related to dealer fee survey (0.1). Total 0.8.	Roger L. Mandel	\$950.00	0.8	\$760.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/22/2022	6:05 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re possible mediators	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/23/2022	5:37 AM	Stewart, Kelly v. USAA Receive email from T. Sanders approving Rule 11 Agreement, email to staff re final preparation of same for filing, and review and approve final version; Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/23/2022	6:06 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Rule 11 Agreement.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/24/2022	5:38 AM	Stewart, Kelly v. USAA Email with co-counsel re status of motion for class certification and setting up call to discuss issues with same (0.2); Email to T. Sanders re mediator choices and status of USAA's response on other issues (0.2); Review and discuss draft exhibits prepared by T. Stockton on t/c with him and discuss status of narrative part of declaration (0.9); T/c with D. Thatcher re reviewing depositions for testimony on dealer fees (0.1); Review summary of testimony received from D. Thatcher (0.2); T/c with S. Jeeves and C. Rothburd re mediators to recommend and possible models for settlement (0.3); T/c w/ E. Normand re mediators to recommend, strengths and weaknesses of claims and possible models for settlement (0.8). Total 2.5.	Roger L. Mandel	\$950.00	2.5	\$2,375.00			2.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/24/2022	6:08 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re status.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/24/2022	2:26 PM	Stewart, Kelly v. USAA Review of 22-03-22 Rule 11 Agreement Regarding Expert Discovery-26146.docx.	Kay Hill	\$175.00	0.1	\$17.50			#####	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/25/2022	5:38 AM	Stewart, Kelly v. USAA T/c with J. Phillips re status of and contents of and legal theories connected to motion for class certification (0.8); T/c with T. Sanders re mediator choice, scheduling issues and possible amendment of petition (0.4). Total 1.2.	Roger L. Mandel	\$950.00	1.2	\$1,140.00			1.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/28/2022	5:39 AM	Stewart, Kelly v. USAA Review deposition of USAA corporate representative to determine the issues related to leased and owner retained vehicles we want to clarify are part of our ACV claims by amending the petition (0.7); Draft email to T. Sanders explain same and other things to be altered by amendments and discussing mediator choice and amending discovery control order (0.2). Total 0.9.	Roger L. Mandel	\$950.00	0.9	\$855.00			0.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/29/2022	5:39 AM	Stewart, Kelly v. USAA T/c with T. Sanders re Amendment issue and scheduling issues and possible need for additional certification experts related to sales tax issues (0.3); Email with J. Phillips and E. Normand re same (0.2); T/c w/ E. Normand re same (0.3); T/c with S. Jeeves and K. Woodford re same and re additional class certification research to be performed by K. Woodford (0.3); Initial review of draft of class certification motion received from J. Phillips (1.2). Total 2.3.	Roger L. Mandel	\$950.00	2.3	\$2,185.00			2.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
3/29/2022	6:08 AM	Stewart, Kelly v. USAA T/C with R. Mandel and K. Woodford re additional research.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/30/2022	5:40 AM	Stewart, Kelly v. USAA In connection with moving for class certification, re view deposition of K. Nilson for relevant testimony (1.4); Review USAA's latest interrogatory answers for relevant answers (0.2); Review and revise declaration of E. Stanton (3.2); Email to him re same (0.2). Total 5.0.	Roger L. Mandel	\$950.00	5	\$4,750.00			5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/30/2022	4:05 PM	Stewart, Kelly v. USAA Review, read, and highlight deposition of David Penn.	Kyle W. Woodford	\$295.00	1	\$295.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/31/2022	5:41 AM	Stewart, Kelly v. USAA T/c w/ T. Sanders re scheduling issues (0.2); Draft lengthy email to co-counsel re case status and tentative schedule (0.3). Total 0.5.	Roger L. Mandel	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/31/2022	6:11 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re case Status.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/1/2022	5:42 AM	Stewart, Kelly v. USAA Draft Third Amended Order Amending Discovery Control Order and email to opposing counsel re same (0.3); Review, revise and add it motion for class certification (6,3). Total 6.6.	Roger L. Mandel	\$950.00	6.6	\$6,270.00			6.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/1/2022	6:12 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Amended Order on Discovery.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/4/2022	5:43 AM	Stewart, Kelly v. USAA Review revised order received from opposing counsel and further revise same (0.2); Email with co-counsel re ability to meet expert deadlines under new proposed order and identity of same (0.3); Email with T. Stockton re his ability to meet schedule (0.1). Total 0.6	Roger L. Mandel	\$950.00	0.6	\$570.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/4/2022	6:13 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Stockton.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/4/2022	9:06 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re settlement agreement.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/5/2022	5:44 AM	Stewart, Kelly v. USAA Email with opposing counsel that order is now ready for submission (0.1); Calculate time for status conference hearing and email to Court submitting order for entry and advising re date (0.2); Review order as entered by Court and email to co-counsel re same (0.1). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
4/5/2022	6:13 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re submitting Order.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/6/2022	5:44 AM	Stewart, Kelly v. USAA Email with K. Hill re obtaining dates for mediation from mediator Rodney Max and procedure for scheduling mediation (0.2); Email with co-counsel re who will attend mediation and mediation scheduling (0.2). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/6/2022	6:14 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re attending mediation.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/7/2022	5:45 AM	Stewart, Kelly v. USAA Email w/ co-counsel re mediation scheduling and email to opposing counsel re same (0.1); Email with staff re setting up special email address to handle class member inquiries (0.1); Continue revision of, conduct legal research re and draft additional portions of class certification motion (7.0). Total 7.2.	Roger L. Mandel	\$950.00	7.2	\$6,840.00			7.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/7/2022	6:15 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re mediation.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/8/2022	5:47 AM	Stewart, Kelly v. USAA Continue review and revision, drafting additional sections to and legal research re motion for class certification. Total 6.5.	Roger L. Mandel	\$950.00	6.5	\$6,175.00			6.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/9/2022	5:47 AM	Stewart, Kelly v. USAA Continue review and revision, drafting additional sections to and legal research re motion for class certification and email to co-counsel turning documents back over to them. Total 2.8.	Roger L. Mandel	\$950.00	2.8	\$2,660.00			2.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/12/2022	5:48 AM	Stewart, Kelly v. USAA Email with opposing counsel re mediation scheduling. Total 0.1.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/12/2022	6:16 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re mediation scheduling.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/12/2022	9:11 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re USAA signing.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/19/2022	5:49 AM	Stewart, Kelly v. USAA Review drafts of Rule 76a motion to seal and public notice of same received from opposing counsel and email with her that we will not oppose (0.4); Review insurance expert declaration draft of George Erickson received from E. Normand and email w/ Normand re relevance of declaration and my editing it (0.9). Total 1.3.	Roger L. Mandel	\$950.00	1.3	\$1,235.00			1.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
4/19/2022	6:17 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re declaration.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/20/2022	5:49 AM	Stewart, Kelly v. USAA Email w/ co-counsel re Texas expert disclosure requirements (0.2); Email with co-counsel re status of class certification motions and expert declarations (0.1); Review and revise George Erickson expert declaration (2.4); Review proposed dates from mediation received from opposing counsel and email with co-counsel re preferred dates and with staff re booking and email in response to opposing counsel (0.3); Review and revise Stockton expert declaration and supporting exhibits (3.4); Review motion to file under seal filed by opposing counsel (0.3). Total 6.7.	Roger L. Mandel	\$950.00	6.7	\$6,365.00			6.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/20/2022	6:18 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re expert disclosure.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/21/2022	5:50 AM	Stewart, Kelly v. USAA Continued email with co-counsel re date and location for mediation and who will attend it and with staff re booking same and preparing notice of mediation (0.3); Email to George Ericson regarding my revisions to his draft and review email from E. Normand re follow up on one part his team needs to do before revisions (0.3); Review revised exhibits received from T. Stockton and t/c with him to go over my revisions and questions about his last draft of declaration and necessary changes to it and new exhibits (1.2); Review proposed sealing orders sent by opposing counsel to Court, email to opposing counsel re proposed changes to orders and additional communication to clerk re scheduling public hearing on sealing motion, t/c with opposing counsel re same and re ascertaining procedure for filing under seal, review email from opposing counsel regarding procedure for filing under seal as explained by clerk and proposed language to clerk re sealing orders and attached revised sealing orders, and email in response approving revised orders and suggesting additional language in email to court clerk, email with opposing counsel re her signing orders with my permission, and review email from opposing counsel to court clerk re sealing orders (0.8). Total 2.3.	Roger L. Mandel	\$950.00	2.3	\$2,185.00			2.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/21/2022	6:18 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re mediation.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/22/2022	5:51 AM	Stewart, Kelly v. USAA Review temporary sealing order entered by Court (0.1); Email w/ opposing counsel re time need for hearing on motion for permanent order (0.1); Email with co-counsel re status of motions and declarations and contents of Erickson declaration and dropping of salvage claim in third amended petition (0.3); Review and revise latest version of Stockton declaration (2.8). Total 3.3.	Roger L. Mandel	\$950.00	3.3	\$3,135.00			3.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/22/2022	6:19 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re hearing.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/23/2022	3:50 PM	Stewart, Kelly v. USAA Reviewed emails from co-counsels.	Scott R. Jeeves	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/24/2022	5:51 AM	Stewart, Kelly v. USAA Email with co-counsel re need for damages calculations declaration at certification, lack of need for tax accountant expert on lessees paying sales tax and fees and setting time for call. Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
4/24/2022	6:20 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re damage calculations.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/25/2022	5:52 AM	Stewart, Kelly v. USAA T/c with J. Phillips re from what experts declarations in support of class certification are required, their contents, contents and status of class certification motion and production of documents by experts (0.6); T/c with opposing counsel re need to amend temporary sealing order to change hearing date and possible date, second telephone conference with her regarding alternative date, review and approve form of amended order received from her, and review her email with court clerk re receipt of and execution of order by Judge (0.6); Draft Third Amended Petition (4.4); Email re same to co-counsel (0.1); Review and revise latest draft of Stockton Report and exhibits (1.2); Email to co-counsel and w/ Stockton re same (0.1). Total 6.9..	Roger L. Mandel	\$950.00	6.9	\$6,555.00			6.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/26/2022	5:52 AM	Stewart, Kelly v. USAA Review latest version of exhibits and email w/ T. Stockton re same (0.3); Review J. Phillips proposed revisions to Stockton report and his email re same and strategy as to whether to ask for median or average dealer fees and email in response (1.4); Follow up email re same and re how to define dealer fees subclass (0.2); Email to T. Stockton re the additional revisions to his report (0.1). Total 2.0.	Roger L. Mandel	\$950.00	2	\$1,900.00			2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/26/2022	6:22 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re expert disclosure.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/26/2022	6:23 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re expert report.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/27/2022	5:53 AM	Stewart, Kelly v. USAA Review and revise and add to class certification motion as received from J. Phillips (9.6); Review and revise notice of mediation and email w/ co-counsel re same (0.3); Review public notice of sealing hearing filed by USAA (0.2). Total 10.1.	Roger L. Mandel	\$950.00	10.1	\$9,595.00			10.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/27/2022	2:12 PM	Stewart, Kelly v. USAA Drafted Notice of Mediation and forwarded to Counsels to review.	Kay Hill	\$175.00	0.3	\$52.50			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/27/2022	3:50 PM	Stewart, Kelly v. USAA Reviewed Notice of Taking Deposition.	Scott R. Jeeves	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/29/2022	5:54 AM	Stewart, Kelly v. USAA Review various sources re correct Regulatory Fees to plead and seek (0.6); Email and t/c's w/ J Phillips re various aspects of Third Amended Petition, Stockton Declaration and Motion for Class Certification, especially regarding the definition of the Regulatory Fees we are claiming and how to categorize them (0.7); Final re view and revision of notice of mediation (0.2); Review First Amended Answer filed by USAA (0.4); Review Kuntz Declaration and email and t/c w/ J. Philips re additions and revisions to same (1.4); Review J. Phillips' proposed revisions to Stockton declaration, accepting some and rejecting others, and further review and revision of same (2.2); Review exhibits to Stockton declaration and t/c w/ T. Stockton re changes to same (1.1). Total 6.6.	Roger L. Mandel	\$950.00	6.6	\$6,270.00			6.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/29/2022	6:23 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Third Amended Petition.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
4/30/2022	5:54 AM	Stewart, Kelly v. USAA Review and revise Third Amended Petition. Total 2.8.	Roger L. Mandel	\$950.00	2.8	\$2,660.00			2.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/1/2022	4:09 PM	Stewart, Kelly v. USAA Review and revise latest version of Stockton Declaration and exhibits received from T. Stockton and highlighting of areas subject to redaction and t/c w/ him final changes and preparation of redacted and un redacted versions. Total 3.5.	Roger L. Mandel	\$950.00	3.5	\$3,325.00			3.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/2/2022	4:09 PM	Stewart, Kelly v. USAA Final review and revision of Third Amended Petition, review and revision of multiple versions of Motion for Class Certification and later review for redactions, review and revise latest version of Kuntz declaration w/ exhibits, email and t/c's w/ Stockton's staff and C. Neff re processing and production of Stockton foundational documents through Disco, final review and revision of multiple versions of the two versions of Stockton declaration and exhibits and t/c's with him re same, review and revise Phillips declaration, review and revise Martin declaration, many emails, texts and t/c's with J. Phillips re all of same. Total 11.2.	Roger L. Mandel	\$950.00	11.2	\$10,640.00			11.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/2/2022	4:26 PM	Stewart, Kelly v. USAA Review third amended petition.	Kyle W. Woodford	\$295.00	0.4	\$118.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/2/2022	9:23 AM	Stewart, Kelly v. USAA Review email from opposing counsel with legal authorities re supposed lack of privilege and relevance of attorney-client agreements and pre-suit communication involving client, email with co-counsel re same and email with co-counsel re our position we will only produce attorney-client agreements. Total 0.3	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/2/2022	6:24 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Legal Authorities.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/3/2022	4:10 PM	Stewart, Kelly v. USAA Review redacted motion as filed w/o exhibits, review unredacted motion as submitted to clerk and as she filed under seal, review exhibits submitted to clerk in detail, email and multiple t/c's with J. Phillips re needed corrections to same and resubmission to court and filing of redacted exhibits, review multiple versions of revised exhibits and email and t/c's with J. Phillips and his staff re same, email and t/c's with opposing counsel re resubmission of exhibits and problem with Stockton declaration being based on wrong spreadsheet and extension for revised version and his class certification response, emails to Court re these issues, review exhibits as resubmitted to Court. Total 6.9.	Roger L. Mandel	\$950.00	6.9	\$6,555.00			6.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/4/2022	4:10 PM	Stewart, Kelly v. USAA Email w/ co-counsel re need to file amended Stockton declaration (0.2); Email with co-counsel re delay in filing notice of filing of class certification exhibits, review notifications of filing and review exhibits as filed (0.7); T/c with T. Stockton re preparing amended declaration (0.2); Email with opposing counsel confirming scheduling of mediation (0.1); Email and t/c w/ court clerk re whether to just file confidential exhibits under seal in addition to motion so already filed or to file motion with all exhibits attached under seal now and re fact that May 27 status conference has been superseded and can be taken off schedule and setting of conference for January 30, 2023 (0.5); Draft Rule 11 Agreement re deadline for filing amended Stockton declaration and extended date for class certification response and email to opposing counsel re same (0.4). Total 2.1.	Roger L. Mandel	\$950.00	2.1	\$1,995.00			2.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/4/2022	4:28 PM	Stewart, Kelly v. USAA Review redacted exhibits.	Kyle W. Woodford	\$295.00	1	\$295.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
5/4/2022	6:25 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Amended Expert Declaration.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/5/2022	4:11 PM	Stewart, Kelly v. USAA Email w/ opposing counsel re his approval of Rule 11 Agreement and scheduling of Stockton deposition (01.); Email w/ T. Stockton re same in light of trial he is participating in (0.2). Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/5/2022	6:26 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Rule 11 Agreement.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/6/2022	4:11 PM	Stewart, Kelly v. USAA T/c w/ T. Stockton re his trial and deposition availability (0.2); Email w/ opposing counsel and co-counsel re scheduling Stockton deposition and other depositions (0.2); Review and revise amended Stockton declarations and exhibits and email with him re preparation of redacted and unredacted versions (2.7); Email to co-counsel re helping with filing of same on Monday (0.1); Review J. Robinson's proposed changes to Amended Stockton Declaration and email to office approving same (0.5). Total 3.6.	Roger L. Mandel	\$950.00	3.6	\$3,420.00			3.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/6/2022	6:27 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re expert deposition.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/9/2022	4:12 PM	Stewart, Kelly v. USAA Review drafts of unredacted and redacted amended declarations of Stockton, t/c with Fontana staff re revising unredacted version, and review final version (0.8); Email w/ court clerk re filing of unredacted motion for class certification and exhibits and of amended Stockton declaration (0.1). Total 1.0.	Roger L. Mandel	\$950.00	1	\$950.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/9/2022	6:27 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Class Cert Motion.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/10/2022	4:12 PM	Stewart, Kelly v. USAA Review Fontana invoice and email w/ co-counsel re approval for payment. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/10/2022	4:28 PM	Stewart, Kelly v. USAA Review drafts of unredacted and redacted amended declarations of Stockton.	Kyle W. Woodford	\$295.00	1	\$295.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/10/2022	6:28 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re expert bill.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/13/2022	4:13 PM	Stewart, Kelly v. USAA Review email from court clerk re hearing on Monday on motion to seal and t/c with S. jeeves re handling (0.1); Draft email to S. Jeeves outlining issues presented for hearing and what position to take for Plaintiffs (0.3). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
5/13/2022	6:29 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Clerk's email.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/16/2022	4:13 PM	Stewart, Kelly v. USAA Review proposed sealing order and order as entered by Court (0.1); Email with opposing counsel and co-counsel re date for Kunz deposition (0.1). Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/16/2022	6:30 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Kunz depo.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/17/2022	4:14 PM	Stewart, Kelly v. USAA Email w/ co-counsel and opposing counsel scheduling Kunz deposition. Total 0.1.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/17/2022	3:56 PM	Stewart, Kelly v. USAA Review email from Kay Hill concerning Fontana Group's billing statement to-date.	Kyle W. Woodford	\$295.00	0.2	\$59.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/18/2022	4:14 PM	Stewart, Kelly v. USAA Review and approve motions for Jake Phillips to be admitted pro hac vice (0.2); Email with opposing counsel and Ted Stockton re whether IHS data produced was original , unaltered data or digested data (0.3). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/23/2022	4:15 PM	Stewart, Kelly v. USAA Email w/ court clerk and co-counsel that 5/27/22 status conference can be counseled (0.2); Review notice on Kunz deposition received from opposing counsel (0.2); Email w/ co-counsel re need for and contents of objection to document requests (0.2). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/23/2022	6:32 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re status Conference.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/24/2022	4:15 PM	Stewart, Kelly v. USAA Review Zoom information from court reporter and email to staff re calendaring (0.1); Email w/ opposing counsel and t/c w/ T. Stockton re date for his deposition (0.2). Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/24/2022	6:33 AM	Stewart, Kelly v. USAA Reviewed and responded to emails.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/25/2022	4:16 PM	Stewart, Kelly v. USAA Email w/ opposing counsel re date for Stockton deposition and scheduling Martin deposition (0.1); Review notice of Stockton deposition (0.2); Email w co-counsel re dates for Matin deposition and defense of Kunz deposition (0.1); Draft objections to Stockton deposition document requests (0.5); Email to Stockton sending him the notice and inquiring about preparation (0.1); Research re Democratic nominee and presumptive winner of election in November to replace current job (0.5); T/c w/ J. Herrera in San Antonio about the candidate (0.5); Review Zoom information re Stockton deposition and email to staff re calendaring (0.1). Total 1.5.	Roger L. Mandel	\$950.00	1.5	\$1,425.00			1.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
5/25/2022	6:33 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Expert Depositions.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/27/2022	4:16 PM	Stewart, Kelly v. USAA Second Chair Kunz deposition. Total 4.0.	Roger L. Mandel	\$950.00	4	\$3,800.00			4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/31/2022	4:17 PM	Stewart, Kelly v. USAA Email w/ T. Stockton re call to discuss deposition preparation and protection of bills and retainer agreement (0.1); Review bills and retainer agreement (0.2); Email w/ C. Neff re preparing them through Disco for production (0.2); T/c w/ T. Stockton to discuss preparation for his deposition and his homework to prepare (0.2). total 0.5.	Roger L. Mandel	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/31/2022	6:34 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re expert depo prep.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/1/2022	12:45 PM	Stewart, Kelly v. USAA Discussed E. Stockton's upcoming deposition and reviewed his information for the deposition.	Scott R. Jeeves	\$950.00	1	\$950.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/1/2022	5:58 AM	Stewart, Kelly v. USAA Review Stockton billing records and retainer agreement as prepared for production by C. Neff amd email to opposing counsel serving same (0.2); Email with co-counsel and to opposing counsel re scheduling Martin deposition (0.1); T/c w/ S. Jeeves re him defending Stockton deposition (0.2); T/c w/ S. Jeeves and T. Stockton to prepare Stockton for his deposition (1.2). Total 1.4.	Roger L. Mandel	\$950.00	1.4	\$1,330.00			1.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/2/2022	4:18 PM	Stewart, Kelly v. USAA Attended Deposition of Edward Stockton.	Scott R. Jeeves	\$950.00	2.4	\$2,280.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/2/2022	12:10 PM	Stewart, Kelly v. USAA Email w/ opposing counsel setting date for Martin deposition (0.1); T/c with T. Stockton and S. Jeeves after Stockton deposition as to how it had gone (0.5). Total 0.6	Roger L. Mandel	\$950.00	0.6	\$570.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/2/2022	6:36 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Martin Deposition.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/8/2022	5:59 AM	Stewart, Kelly v. USAA Review latest invoice from Fontana and email to staff re paying same (0.2); Email w/ opposing counsel re his request for certain data reviewed by but not produced by Stockton and email to Stockton re same (0.2). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/8/2022	6:36 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re data.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
6/9/2022	6:00 AM	Stewart, Kelly v. USAA Email with Stockton re him reviewing but not relying upon data (0.1); Email w/ opposing counsel re whether he still wants data which he did (0.1); Review deposition notice for martin and document requests received from opposing counsel (0.2); Email w/ Normand team re who will be defending deposition and preparing objections to document requests (0.2); Email w/ S. Jeeves re sitting in on deposition since will be driving home from NC (0.1); Review email providing link to data to be produced received from Stockton and email to C. Neff re ingesting into Disco and producing (0.1). Total 0.8.	Roger L. Mandel	\$950.00	0.8	\$760.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/13/2022	6:00 AM	Stewart, Kelly v. USAA Review objections to Martin document requests served by co-counsel (0.2); Email w/ K. Hill re receipt of Stockton deposition transcript and sending to him to review and correct and due date for errata sheet and review her email to him re same (0.2). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/13/2022	6:44 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re stockton Depo transcript.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/16/2022	6:01 AM	Stewart, Kelly v. USAA Email w/ opposing counsel re status of production of additional Stockton documents (0.1); T/c and email w/ K. Woodford re handling production of documents for Stockton and Martin (0.2); Email w/ all counsel re status of Zoom link for Martin deposition (0.1); Email with co-counsel re production of Martin documents in proper fashion to comply w/ ESI protocol (0.2). Total 0.6.	Roger L. Mandel	\$950.00	0.6	\$570.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/16/2022	6:01 AM	Stewart, Kelly v. USAA T/c w/ S. Jeeves re outcome of Martin deposition. Total 0.2	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/16/2022	6:02 AM	Stewart, Kelly v. USAA Email w/ T. Stockton re providing draft of errata sheet by 6/29. Total 0.1	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/16/2022	11:46 AM	Stewart, Kelly v. USAA Email with RLM on stockton document production and compiling same.	Kyle W. Woodford	\$295.00	0.5	\$147.50			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/16/2022	12:48 PM	Stewart, Kelly v. USAA Email BATE stamped version of the Martin production to Normand's office and staff.	Kyle W. Woodford	\$295.00	0.5	\$147.50			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/16/2022	6:54 AM	Stewart, Kelly v. USAA T/C with R. Mandel re Martin deposition.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/17/2022	1:27 PM	Stewart, Kelly v. USAA Covered depo of Jeff Martin; Talked with Jake; Relayed to Roger my thoughts on depo.	Scott R. Jeeves	\$950.00	2.3	\$2,185.00			2.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/22/2022	5:59 AM	Stewart, Kelly v. USAA Email w/ opposing counsel setting date for Martin deposition (0.1); T/c with T. Stockton and S. Jeeves after Stockton deposition as to how it had gone (0.5). Total 0.6	Roger L. Mandel	\$950.00	0.6	\$570.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
6/22/2022	3:53 PM	Stewart, Kelly v. USAA Per call with Roger Mandel, and in conjunction with Casim Neff, make all necessary changes to the document production (Simon, Arevalo, and Stewart) in order to stay in compliance.	Kyle W. Woodford	\$295.00	3	\$885.00			3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/22/2022	6:54 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re costs.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/24/2022	6:02 AM	Stewart, Kelly v. USAA Receive email from Normand firm w/ attached invoices re Q2 expenses for true up, review agreent re same, email to Normand office re sending to other firms liable for costs and email to P. Jeeves re preparing our expenses for true up. Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/27/2022	6:02 AM	Stewart, Kelly v. USAA Review email to all firms by Normand office re true up and email to P. Jeeves re same (0.1); Email w/ co-counsel re calendaring date for beginning communications w/ co-counsel, mediator and opposing counsel re settlement (0.1). Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/27/2022	6:55 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re mediation/settlement.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/29/2022	6:03 AM	Stewart, Kelly v. USAA Review proposed errata sheet to his deposition from T. Stockton (0.2); Email w/ S. Jeeves re him reviewing deposition for other possible changes (0.1). total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/29/2022	6:56 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re reviewing deposition of Stockton.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/29/2022	6:57 AM	Stewart, Kelly v. USAA Reviewed Deposition of Expert Stockton.	Scott R. Jeeves	\$950.00	1.2	\$1,140.00			1.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/30/2022	12:56 PM	Stewart, Kelly v. USAA reviewing depo etc.	Scott R. Jeeves	\$950.00	2	\$1,900.00			2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/30/2022	6:03 AM	Stewart, Kelly v. USAA Review email from S. Jeeves saying no further changes to Stockton transcript needed and email to T. Stockton asking for signed, notarized errata sheet. Total 0.1.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/30/2022	6:58 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Stockton depo transcript.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
7/1/2022	2:39 PM	Stewart, Kelly v. USAA Reviewed and drafted Depo Summary for Edward Stockton.	Scott R. Jeeves	\$950.00	2	\$1,900.00			2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/1/2022	5:55 AM	Stewart, Kelly v. USAA Review T. Stockton executed, notarized errata sheet and email to staff re sending to reporter and review email from staff to reporter sending same. Total 0.1.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/1/2022	6:59 AM	Stewart, Kelly v. USAA Reviewed and responded to emails.	Scott R. Jeeves	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/5/2022	2:40 PM	Stewart, Kelly v. USAA Reviewed Errata Sheet from E. Stockton deposition.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/7/2022	12:55 PM	Stewart, Kelly v. USAA Reviewed court report errata sheet.	Scott R. Jeeves	\$950.00	0.1	\$95.00		#####		<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/8/2022	5:55 AM	Stewart, Kelly v. USAA Review calendaring and email history re mediation and email to staff re need to file notice of mediation. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/8/2022	6:59 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re mediation Notice.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/11/2022	5:56 AM	Stewart, Kelly v. USAA Email re timing on sending materials to mediator and what materials w/ co-counsel (0.1); Review T. Stockton/Fontana invoice and email to them asking questions (0.2). Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/11/2022	7:06 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re mediation documents.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/13/2022	5:56 AM	Stewart, Kelly v. USAA Email w/ S. Jeeves re strategy for pre-mediation date communications w/ mediator. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/13/2022	7:09 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re strategy re mediation.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
7/18/2022	5:57 AM	Stewart, Kelly v. USAA Email w/ opposing counsel re lack of opposition to schedule extension based on death of his father (0.2); Review draft of unopposed motion and email w/ opposing counsel approving same and signing for me (0.2). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/18/2022	7:09 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re scheduling extension.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/19/2022	4:35 PM	Stewart, Kelly v. USAA Reviewed email with extension.	Scott R. Jeeves	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/19/2022	5:57 AM	Stewart, Kelly v. USAA Review order from Court extending deadlines (0.1); Review letter agreement from mediator (0.3). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/20/2022	5:15 PM	Stewart, Kelly v. USAA Review order extending deadlines.	Kyle W. Woodford	\$295.00	0.1	\$29.50			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/21/2022	4:58 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re extending deadlines.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/29/2022	4:06 PM	Stewart, Kelly v. USAA Briefly review deposition of Edward Stockton.	Kyle W. Woodford	\$295.00	1	\$295.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/2/2022	5:00 AM	Stewart, Kelly v. USAA Review and respond to emails re dealer fees, et al.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/7/2022	12:11 PM	Stewart, Kelly v. USAA Review the notices of filing relating to class certification response and exhibits and emails from opposing counsel re links to Tomlinson working papers and unredacted versions of filing (0.2); Email to K. Hill re downloading of filed and unredacted version (0.1); Email to C. Neff re downloading and review of Tomlinson working papers (0.1). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/7/2022	7:11 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Tomlinson.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/8/2022	12:12 PM	Stewart, Kelly v. USAA Email w/ K. Hill re downloading of filings and unredacted copies of class certification reply and exhibits (0.2); Email w/ C. Neff re his downloading of Tomlinson working papers and summarizing same on spreadsheet (0.2); Email w/ S. Jeeves re need for Stockton to review Tomlinson and help me prepare for deposition and prepare reply declaration (0.1); R Initial review of class certification reply (0.7); Begin detailed review, highlighting, and analysis of Tomlinson deposition (1.6). Total 2.8	Roger L. Mandel	\$950.00	2.8	\$2,660.00			2.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
8/8/2022	7:14 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Stockton/Tomlinson.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/9/2022	12:13 PM	Stewart, Kelly v. USAA Continue review, highlighting, and analysis of Tomlinson Declaration (0.9); Email to S. Jeeves and C. Rothburd re my analysis of same and need for reply declaration from Stockton and his help in preparing for Tomlinson deposition (0.7); Email w/ S. Jeeves re potential dealer rebuttal experts (0.2); Email to T. Stockton re USAA response, Tomlinson declaration, what we will be sending him, timing on declaration, and conducting analyses for me prior to me taking Tomlinson deposition (0.2); Review email from C. Neff re his uploading and review of Tomlinson's working documents and updated document review summary and quick review of summary (0.3); t/C W/ k. Woodford re breach of contract research related to our forthcoming class certification reply (0.1); Review initial research and email to K. Woodford re additional needed research (0.3); Review additional research provided by K. Woodford (0.3). Total 3.0	Roger L. Mandel	\$950.00	3	\$2,850.00			3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/9/2022	7:15 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re rebuttal expert.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/9/2022	4:16 PM	Stewart, Kelly v. USAA Legal research relating to nominal damages and circulate memo and case law to Roger Mandel and Scott Jeeves.	Kyle W. Woodford	\$295.00	4	\$1,180.00			4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/10/2022	12:13 PM	Stewart, Kelly v. USAA Email w/ co-counsel re scheduling conference to discuss whether and how to use Stockton to reply to Tomlinson, the agenda for the conference, Tomlinson' opinions and how we will respond to them and whether we need dealer expert and, if so, who. Total 0.5	Roger L. Mandel	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/10/2022	7:17 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re status conference.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/11/2022	4:02 PM	Stewart, Kelly v. USAA T/C to strategize experts.	Scott R. Jeeves	\$950.00	1	\$950.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/12/2022	12:14 PM	Stewart, Kelly v. USAA Review emails and attached documents from C. Neff re how electronic claim files could easily be searched for indications of appraisal and lease. Total 1.2	Roger L. Mandel	\$950.00	1.2	\$1,140.00			1.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/12/2022	7:18 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re claims files.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/15/2022	12:15 PM	Stewart, Kelly v. USAA Email to opposing counsel requesting Tomlin deposition and suggesting dates (0.1); Email to T. Stockton providing Tomlin deposition and USAA class certification response and requesting time to discuss same and limited reply declaration by him (0.1). Total 0.2	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
8/15/2022	7:19 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Tomlin depo.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/16/2022	12:16 PM	Stewart, Kelly v. USAA T/c w/ T. Stockton re his review of response and declaration and scheduling call for us to discuss a limited reply by him and previewing for him the arguments and what he should focus on and possible responses to same (0.6); Review email from opposing counsel re alternative dates for Tomlin deposition and email w/ S. Jeeves and C. Rothburd re one of them taking it while I am on vacation (0.2); t/c w/ S. Jeeves re him taking deposition and me preparing outline for him and conversation w/ Stockton (0.2); Review article re recent class action decisions and email to k. Woodford re obtaining copies of possibly relevant cases (0.2). Total 1.2	Roger L. Mandel	\$950.00	1.2	\$1,140.00			1.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/17/2022	3:42 PM	Stewart, Kelly v. USAA Minor edits to Tomblin deposition notice and send them to Kay Hill.	Kyle W. Woodford	\$295.00	0.2	\$59.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/17/2022	12:16 PM	Stewart, Kelly v. USAA Email w/ K. Hill re preparing deposition notice for Tomlin and w/ her and S. Jeeves re whether to video (0.1); T/c with T. Sanders re deposition date and document production (0.1); Review and revise Tomlin deposition notice, including drafting document requests (0.5); Email w/ K. Hill re calendaring and obtaining reporter and videographer (0.1). Total 0.8	Roger L. Mandel	\$950.00	0.8	\$760.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/17/2022	8:26 AM	Stewart, Kelly v. USAA Pull the relevant case law for RLM (relating to class certification).	Kyle W. Woodford	\$295.00	1	\$295.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/17/2022	2:15 PM	Stewart, Kelly v. USAA Draft Notice of Taking Deposition for Tomblinson. Calendar on SRJ's Calender; Requested depo of Court Reporter.	Kay Hill	\$175.00	0.1	\$17.50			#####	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/18/2022	12:17 PM	Stewart, Kelly v. USAA T/c w/ C. Neff to discuss his search for documents relevant to ability to easily find in claim files whether appraisal took place and whether car was leased and review together multiple documents he previously located and his search for documents backing up Tomlin charts of probability of buying from dealer including reviewing together summary of documents produced by USAA to select additional documents (1.3); Review additional documents located by C. Neff, including two long economics articles re studies, and highlight them and prepare then for transmittal to expert, T. Stockton (1.2). Total 2.5	Roger L. Mandel	\$950.00	2.5	\$2,375.00			2.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/19/2022	12:17 PM	Stewart, Kelly v. USAA Review Tomlin report and exhibits and perform research on military car lots in preparation for Stockton call to discuss his reply declaration. Total 3.1.	Roger L. Mandel	\$950.00	3.1	\$2,945.00			3.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/20/2022	12:18 PM	Stewart, Kelly v. USAA Draft lengthy email to Normand team co-counsel re division of labor on class certification reply and what arguments I believe need to be made and sources in prior briefing. Total 1.3	Roger L. Mandel	\$950.00	1.3	\$1,235.00			1.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/20/2022	7:22 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re division of labor.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
8/21/2022	12:19 PM	Stewart, Kelly v. USAA Review Tomlin backup documents and emails to T. Stockton providing him pertinent documents and my thoughts on same (3.5); Email w/ T. Stockton re same (0.3); Email w/ C. Neff and K. Woodford re follow up follow up legal research needed (0.3). Total 4.1	Roger L. Mandel	\$950.00	4.1	\$3,895.00			4.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/21/2022	7:36 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re legal research and expert.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/22/2022	12:19 PM	Stewart, Kelly v. USAA Email w/ K. Hill re locating documents for Stockton (0.2); Review of key deposition testimony and exhibits and email to Stockton re same (1.2). Total 1.4	Roger L. Mandel	\$950.00	1.4	\$1,330.00			1.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/22/2022	7:37 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re documents for Stockton.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/24/2022	12:20 PM	Stewart, Kelly v. USAA T/c w/ K. Woodford re factual research to support Stockton (0.2); Drafting of outline for class certification reply (1.7). Total 1.9	Roger L. Mandel	\$950.00	1.9	\$1,805.00			1.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/24/2022	1:13 PM	Stewart, Kelly v. USAA T/c with Roger Mandel on Stockton research. (0.2). Conduct same. (1.6).	Kyle W. Woodford	\$295.00	1.8	\$531.00			1.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/25/2022	4:23 PM	Stewart, Kelly v. USAA Internal emails regarding research necessary for Scott Jeeves upcoming expert deposition.	Kyle W. Woodford	\$295.00	0.2	\$59.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/26/2022	5:05 AM	Stewart, Kelly v. USAA Review and respond to emails - re depos	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/29/2022	7:22 PM	Stewart, Kelly v. USAA Research and compile exhibits for attorney Scott Jeeves upcoming expert deposition.	Kyle W. Woodford	\$295.00	4	\$1,180.00			4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/29/2022	3:45 PM	Stewart, Kelly v. USAA T/c with Casim Neff regarding the documents needed for the upcoming deposition.	Kyle W. Woodford	\$295.00	0.6	\$177.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8/30/2022	10:44 AM	Stewart, Kelly v. USAA Edit the Tomblin deposition outline and send to Scott Jeeves to prep.	Kyle W. Woodford	\$295.00	1	\$295.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/1/2022	5:30 PM	Stewart, Kelly v. USAA Review and prepare for J. Tomlin deposition.	Scott R. Jeeves	\$950.00	10	\$9,500.00			10	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
9/2/2022	5:14 PM	Stewart, Kelly v. USAA Attended and take the Deposition of Jonathan Tomlin.	Scott R. Jeeves	\$950.00	5	\$4,750.00			5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/6/2022	6:04 AM	Stewart, Kelly v. USAA Email w/ co-counsel re having Stockton proceed with reply declaration based on estimate and results of Tomlin deposition (0.3); Email to T. Stockton re starting work in connection with reply declaration (0.1). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/6/2022	8:26 AM	Stewart, Kelly v. USAA Email w/ co-counsel re having Stockton proceed with reply declaration based on estimate and results of Tomlin deposition (0.3); Email to T. Stockton re starting work in connection with reply declaration (0.1). Total 0.4	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/6/2022	7:38 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re reply expert declaration.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/9/2022	6:04 AM	Stewart, Kelly v. USAA Email w/ T. Stockton re status of his work on reply declaration and date for first draft (0.1); Review charts showing used car purchasing behavior in Fort Hood/Killeen received from T/ Stockton and email w/ him re how to incorporate into his declaration and possible similar analysis for San Antonio (0.3). Total 0.4.	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/9/2022	8:27 AM	Stewart, Kelly v. USAA Email w/ T. Stockton re status of his work on reply declaration and date for first draft (0.1); Review charts showing used car purchasing behavior in Fort Hood/Killeen received from T/ Stockton and email w/ him re how to incorporate into his declaration and possible similar analysis for San Antonio (0.3). Total 0.4	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/9/2022	7:39 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re status update with Expert.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/19/2022	6:05 AM	Stewart, Kelly v. USAA T/c w/ T. Stockton re us proposing amended dealer fees subclass definition and new analyses to run in connection with same and estimate of his sending first draft of declaration and review and respond to his email to staff re the new analyses. Total 0.5.	Roger L. Mandel	\$950.00	5	\$4,750.00			5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/20/2022	6:13 AM	Stewart, Kelly v. USAA Email to T. Stockton re transcript of Tomlin deposition (0.1); Email w/ T. Stockton re what analyses to run given that VIN numbers for class members are not available in the sample spreadsheet we have from USAA (0.1); T/c w/ E. Normand re what pre-mediation communication to have with mediator and possible mediation terms (0.3); T/c w/ S. Jeeves re same (0.2); T/c w/ both E. Normand and S. Jeeves re same (1.4). Total 2.1.	Roger L. Mandel	\$950.00	2.1	\$1,995.00			2.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/20/2022	7:41 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re expert analysis	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
9/22/2022	6:14 AM	Stewart, Kelly v. USAA Draft email to opposing counsel requesting updated class spreadsheets in advance of mediation, including specifying contents thereof, and offering to consider settlement with USAA entities not currently named in the suit (0.3); Review confirmation letter from mediator (0.1); Research re mediator (0.2); Draft lengthy email to S. Jeeves and E. Normand recapping our first call and task list re mediation (0.7); Listen to the oral argument on the appeal of class certification in the Sos v. State Farm case for relevance to class certification in this case (0.6); Email w/ S. Jeeves re approaching him to let me do argument in Geico Texas appeal (0.2). Total 2.1.	Roger L. Mandel	\$950.00	2.1	\$1,995.00			2.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/22/2022	4:07 PM	Stewart, Kelly v. USAA Review and read Jonathan Tomblin deposition.	Kyle W. Woodford	\$295.00	2.5	\$737.50			2.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/22/2022	7:42 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re updated class spreadsheets.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/23/2022	2:25 PM	Stewart, Kelly v. USAA Review and read Kuntz deposition.	Kyle W. Woodford	\$295.00	2	\$590.00			2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/27/2022	6:15 AM	Stewart, Kelly v. USAA Email w/ opposing counsel re their provision of updated class spreadsheets (0.1); Email w/ J. Phillips confirming spreadsheets have adequate information to calculate damages and that calculations can be performed before mediation if spreadsheets received near end of first week in October and re status of class certification reply (0.2). Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/27/2022	8:35 AM	Stewart, Kelly v. USAA Email w/ opposing counsel re their provision of updated class spreadsheets (0.1); Email w/ J. Phillips confirming spreadsheets have adequate information to calculate damages and that calculations can be performed before mediation if spreadsheets received near end of first week in October and re status of class certification reply (0.2). Total 0.3	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/27/2022	7:43 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re updated class spreadsheet.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/30/2022	6:15 AM	Stewart, Kelly v. USAA Email to S. Jeeves and E. Normand following up on tasks for mediation preparation. Total 0.1.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/30/2022	8:36 AM	Stewart, Kelly v. USAA Email to S. Jeeves and E. Normand following up on tasks for mediation preparation. Total 0.1.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9/30/2022	7:44 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re mediation tasks.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/4/2022	1:35 PM	Stewart, Kelly v. USAA Email w/ S. Jeeves and E. Normand re setting next call to prepare for mediation. Total 0.1	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
10/4/2022	7:44 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re setting call re mediation.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/5/2022	1:36 PM	Stewart, Kelly v. USAA Review email from mediator re setting up pre-mediation call and providing materials and follow up scheduling email. Total 0.1	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/5/2022	7:52 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re mediation.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/6/2022	1:36 PM	Stewart, Kelly v. USAA Send Zoom invitation and email to E. Normand and S. Jeeves re agenda for call today and what to send to mediator (0.1); T/c w/ S. Jeeves re same and rescheduling call with mediator (0.1); Zoom conference w/ E. Normand and S. Jeeves to prepare for mediation (1.5); t/c w/ T. Stockton re process for finalizing his reply declaration (0.1). Total 1.8.	Roger L. Mandel	\$950.00	1.8	\$1,710.00			1.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/6/2022	7:53 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re mediation prep.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/7/2022	1:42 PM	Stewart, Kelly v. USAA Review and revise Stockton Reply declaration (1.7); Email w/ co-counsel re logistics for mediation (0.1). Total 1.8.	Roger L. Mandel	\$950.00	1.8	\$1,710.00			1.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/7/2022	7:54 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re mediation.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/9/2022	1:44 PM	Stewart, Kelly v. USAA Review email from E. Normand re possible strategy for mediation. Total 0.2	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/9/2022	7:54 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re mediation.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/10/2022	2:20 PM	Stewart, Kelly v. USAA Legal research on the "hypothetical defense" USAA is alleging. Draft memo with supporting case law that shows this "defense" is likely not supported by the law. Will follow up at a later date.	Kyle W. Woodford	\$295.00	3.1	\$914.50			3.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/10/2022	4:16 PM	Stewart, Kelly v. USAA Legal research on whether case law would support the argument that USAA waived its affirmative defenses. Draft memo on same and circulate the case law.	Kyle W. Woodford	\$295.00	5.1	\$1,504.50			5.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
10/10/2022	1:44 PM	Stewart, Kelly v. USAA Review and revise multiple versions Stockton declaration and review supporting graphs and exhibits and email w/ T. Stockton and Fontana staff re same and t/c's w/ T. Stockton re same (3.8); T/c w/ K. Woodford re needed legal re class certification reply brief, review same, email w/ and t/c w/ K. Woodford re necessary follow up, review additional research and email re that (0.8); Begin review and revision of and drafting of additional sections to class certification reply brief (7.1). Total 11.7	Roger L. Mandel	\$950.00	11.7	\$11,115.00			11.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/10/2022	7:55 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re mediation and research.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/11/2022	12:14 PM	Stewart, Kelly v. USAA Review all depositions for evidence of any testimony that a payment within USAA's database could show that an insured went to appraisal. In addition, t/c with Roger Mandel.	Kyle W. Woodford	\$295.00	3	\$885.00			3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/11/2022	4:16 PM	Stewart, Kelly v. USAA Email Roger Mandel multiple times relevant portions of testimony re: database for payment.	Kyle W. Woodford	\$295.00	0.3	\$88.50			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/11/2022	6:18 PM	Stewart, Kelly v. USAA Legal research that individual damage calculations do not preclude class certification. Draft memo and circulate the relevant case law.	Kyle W. Woodford	\$295.00	3.3	\$973.50			3.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/11/2022	1:45 PM	Stewart, Kelly v. USAA Review letter from mediator's office re providing pre-mediation materials and confidentiality agreement and email w/ co-counsel re what to provide and who will attend mediation and needs to sign agreement, when to pay mediator and contacting opposing counsel re how our respective clients will attend mediation (1.2); Email to opposing counsel re same and when they will be providing updated class damages information (0.1); T/c w/ K. Woodford re necessary additional legal research and review of Penn deposition for supporting materials (0.2); Review legal research provided by K. Woodford (0.3); Review cited deposition testimony of Penn provided by K. Woodford and further review of deposition (1.2); Review and revise latest version of Stockton declaration and updated graphs and exhibits and email and t/c's re same w/ T. Stockton and Fontana staff (3.5); Legal research re and continue review, revision and drafting additional sections to class certification reply brief (6.4). Total 12.9	Roger L. Mandel	\$950.00	12.9	\$12,255.00			12.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/12/2022	9:13 AM	Stewart, Kelly v. USAA Reviewed Plaintiffs' Reply in Support of the Motion for Class Certification.	Scott R. Jeeves	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/12/2022	9:14 AM	Stewart, Kelly v. USAA Phone call with opposing counsel; phone call with R. Mandel.	Scott R. Jeeves	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/12/2022	1:45 PM	Stewart, Kelly v. USAA M Review and revise Stockton declaration and supporting graphs twice more and email and t/c w/ T/ Stockton and Fontana staff re same (3.1); Review email from opposing counsel re when updated class information will be provided and his client attending via zoom and email w/ co-counsel re whether that is acceptable (0.4); T/c w/ S. Jeeves re same and his t/c w/ opposing counsel and drafting initial proposal and counter proposals for and re why shifting basis for certification to get more fees is not good idea (0.5); Legal research re and complete review, revision and drafting addition section of class certification reply (7.9). Total 11.9.	Roger L. Mandel	\$950.00	11.9	\$11,305.00			11.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/13/2022	1:46 PM	Stewart, Kelly v. USAA Review final filed version of reply (0.5); Email w/ S. Jeeves re same (0.2); Email w/ S. Jeeves and E. Normand re USAA in-house counsel attending mediation by Zoom (0.1). Total 0.8	Roger L. Mandel	\$950.00	0.8	\$760.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name</i> <i>Explanation</i>	<i>User</i>	<i>Hourly</i> <i>Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours</i> <i>Worked</i>	<i>Billable</i> <i>Time</i>	<i>Billed</i>	<i>Billed</i> <i>Date</i>
10/13/2022	5:15 PM	Stewart, Kelly v. USAA Review our reply in support of class certification.	Kyle W. Woodford	\$295.00	0.6	\$177.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/13/2022	7:56 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re reply draft.	Scott R. Jeeves	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/20/2022	8:13 PM	Stewart, Kelly v. USAA Legal research on Texas courts opinions re: claims-made class action settlements. Circulate memo and case law to Roger Mandel and Scott Jeeves.	Kyle W. Woodford	\$295.00	6.2	\$1,829.00			6.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/20/2022	1:46 PM	Stewart, Kelly v. USAA Review Rule 42 and Tex. Ins Code 541 and email to S. Jeeves and E. Normand re certifying under one versus the other and follow up email with them re same (1.2); Draft proposed initial settlement proposal and follow up offers and email to S. Jeeves and E. Normand re same (2.5); Email w/ them re same, including E. Normand incorporating initial offer into settlement term sheet to be given to opposing counsel and mediator, and our results in Michigan and settlement Normand obtained in Ohio, including reading motion for preliminary approval there (0.8); Email w/ opposing counsel re status on USAA providing update class member data (0.1). Total 4.6	Roger L. Mandel	\$950.00	4.6	\$4,370.00			4.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/20/2022	6:42 AM	Stewart, Kelly v. USAA Reviewed memo from K. Woodford.	Scott R. Jeeves	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/21/2022	1:47 PM	Stewart, Kelly v. USAA Review spreadsheets sent by USAA w/ updated information on class members and on total loss insureds from two other USAA entities in Texas (0.5); Email w/ co-counsel re significance of the provision of the data on the other two entities and the need for damages estimates based on this data to use at mediation and settlement strategy and need to collect information on our fees and expenses related to fee-shifting claim (1.6). Total 2.1.	Roger L. Mandel	\$950.00	2.1	\$1,995.00			2.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/21/2022	7:58 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re mediation and settlement.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/22/2022	1:48 PM	Stewart, Kelly v. USAA Email w/ co-counsel re possibility of adding theft prevention claim fee into settlement discussions. Total 0.3	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/24/2022	1:48 PM	Stewart, Kelly v. USAA Review email from mediator's office regarding head count and attached correspondence re mediation and email back as to who will be attending on our part (0.4); Research into history of regulation and USAA's likely compliance over time with changing required wording and email w/ co-counsel re why not to include Texas theft prevention fee in settlement discussions (1.5); Email w/ opposing counsel re issues with team members obtaining new spreadsheet data (0.3); Pre-mediation preparation call w/ mediator (0.9); T/c w/ opposing counsel re spreadsheets and desire by USAA to settle for all entities and to confirm data for additional entities starts 9/30/22 (0.2); Email w/ co-counsel re the spreadsheets and estimating damages (0.3); Email w/ co-counsel whether the Zebersky team has ever appeared and needs to w/ draw and obtaining agreement terminating relationship w/ client (0.2). Total 3.5	Roger L. Mandel	\$950.00	3.5	\$3,325.00			3.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/24/2022	3:08 PM	Stewart, Kelly v. USAA Review data spreadsheets and give synopsis to Scott Jeeves.,	Kyle W. Woodford	\$295.00	1.8	\$531.00			1.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
10/24/2022	6:40 AM	Stewart, Kelly v. USAA Conference with K. Woodford re spreadsheet.	Scott R. Jeeves	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/24/2022	9:47 AM	Stewart, Kelly v. USAA Reviewed conference call with mediator.	Scott R. Jeeves	\$950.00	0.7	\$665.00			0.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/25/2022	1:49 PM	Stewart, Kelly v. USAA Email w/ opposing counsel clarifying what information the spreadsheets show (0.1); Email w/ co-counsel re preliminary damages estimates on just our defendants and need for more detailed information on them and calculations on the two additional entities (0.3); Email to co-counsel further addressing settling under Rule 42 or chapter 541 (0.4). Total 0.8	Roger L. Mandel	\$950.00	0.8	\$760.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/25/2022	7:59 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re clarification of spreadsheets.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/27/2022	5:04 PM	Stewart, Kelly v. USAA Reviewed emails with Co-Counsel re amending complaint and strategy re fee expert ; reviewed letter to OC;	Scott R. Jeeves	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/27/2022	1:49 PM	Stewart, Kelly v. USAA Review class certification motion and deposition testimony to clarify what fees they started paying for the first time in 2022 and what they still do not pay (1.3); Email w/ co-counsel re same (0.2); T/c w/ T. Sanders to confirm our understanding (0.1); Email w/ opposing counsel as to when we will provide initial term sheet (0.1); Review and revise and add section on dealer fees to draft of initial term sheet received from E. Normand (1.2); Email re same w/ E. Normand (0.1). Total 3.0	Roger L. Mandel	\$950.00	3	\$2,850.00			3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/28/2022	1:50 PM	Stewart, Kelly v. USAA Review and revise latest version of term sheet received from E. Normand and email to opposing counsel re same (2.5); Follow up email re possible response w/ opposing counsel (0.1); Email w/ S. Jeeves re obtaining out standing expert invoices (0.1); Email to T. Stockton requesting Fontana bill (0.1). Total 2.7	Roger L. Mandel	\$950.00	2.7	\$2,565.00			2.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/28/2022	5:12 PM	Stewart, Kelly v. USAA Review latest term sheet.	Kyle W. Woodford	\$295.00	0.3	\$88.50			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/28/2022	8:00 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re expert.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/29/2022	1:50 PM	Stewart, Kelly v. USAA Review Fontana invoice and T. Stockton email re same and email to S. Jeeves re same. Total 0.3	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/29/2022	8:03 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Expert.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
10/30/2022	1:51 PM	Stewart, Kelly v. USAA Emailed w/ R. Mandel re why Fontana bill was so high and what work was required and why.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/31/2022	1:52 PM	Stewart, Kelly v. USAA Email w/ S. Jeeves and firm staff re compilation of lodestar and costs needed for mediation (0.2); Email w/ E. Normand re status on better damages estimates (0.1); Review lengthy response to initial term sheet received from opposing counsel (0.3); T/c w/ E. Normand and S. Jeeves regarding how to respond to same and mediation strategy (1.7); Review suggested language from E. Normand to use in response (0.2). Total 2.5	Roger L. Mandel	\$950.00	2.5	\$2,375.00			2.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/31/2022	8:05 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re costs for mediation.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10/31/2022	5:35 AM	Stewart, Kelly v. USAA Draft Rule 11 Agreement Regarding Expert Testimony (0.3); Email with opposing counsel re same and USAA's interest in scheduling a mediation (0.1); Review prior email from E. Normand re potential mediators and email to him requesting call re same (0.1); T/c and email with co-counsel re possible mediators (0.2); T/c with T. Stockton re issue related to dealer fee survey (0.1). Total 0.8.	Roger L. Mandel	\$950.00	0.8	\$760.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/1/2022	6:38 AM	Stewart, Kelly v. USAA Review revised damages estimates received from E. Normand (0.4); T/c w/ E. Normand re same (0.8); draft reply to opposing counsel's response to our initial term sheet (1.8). Total 3.0.	Roger L. Mandel	\$950.00	3	\$2,850.00			3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/1/2022	6:23 AM	Stewart, Kelly v. USAA Receive, Review and Respond to emails from Co-Counsel. Review OC's Extension request;	Scott R. Jeeves	\$950.00	0.6	\$570.00			0.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/2/2022	7:34 PM	Stewart, Kelly v. USAA Phone call with SRJ (2) re spreadsheet for mediation. Phone call with C. Neff re same; updated spreadsheet and emailed to RLM and SRJ.	Kay Hill	\$175.00	0.4	\$70.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/2/2022	6:39 AM	Stewart, Kelly v. USAA Review opposing counsel's further comments on our reply on the initial term sheet (0.4); Review motion to strike Stockton's expert testimony (0.9); Travel to Miami for mediation (6.8); Continue preparation by review of deposition testimony and charting fees paid at different times (1.2); Meeting w/ S. Jeeves to prepare for mediation (1.0). Total 10.3	Roger L. Mandel	\$950.00	10.3	\$9,785.00			10.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/2/2022	8:16 AM	Stewart, Kelly v. USAA Prepared for mediation.	Scott R. Jeeves	\$950.00	1	\$950.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/3/2022	5:58 PM	Stewart, Kelly v. USAA Discussion with SRJ and KWW through emails and phone re mediation and the continuation of same.	Kay Hill	\$175.00	0.5	\$87.50			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/3/2022	8:34 AM	Stewart, Kelly v. USAA Prepared for Mediation.	Scott R. Jeeves	\$950.00	3	\$2,850.00			3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
11/3/2022	8:34 AM	Stewart, Kelly v. USAA Attended Mediation.	Scott R. Jeeves	\$950.00	8	\$7,600.00			8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/3/2022	8:35 AM	Stewart, Kelly v. USAA Reviewed, and discussed Mediator Maxx Summary with Roger and forwarded to K. Hill to review.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/3/2022	6:39 AM	Stewart, Kelly v. USAA Prepare for mediation, including emailing initial terms sheet to mediator and meeting with S. Jeeves and walk to mediation (1.5); Participate in mediation (8.6); Meeting w/ S. Jeeves to discuss results and next steps (1.1). Total 11.2	Roger L. Mandel	\$950.00	11.2	\$10,640.00			11.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/4/2022	6:40 AM	Stewart, Kelly v. USAA Travel back to Dallas (7.1); Review email from mediator summarizing parties' positions at end of day and scheduling continuation, draft email in response correcting one aspect of summary and follow up email with opposing counsel and co-counsel (0.3); Review email re mediator invoice and signing new confidentiality agreement and email w/ S. Jeeves re payment of invoice and signing of agreement (0.2). Total 7.6	Roger L. Mandel	\$950.00	7.6	\$7,220.00			7.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/4/2022	8:18 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re mediator invoice.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/21/2022	6:42 AM	Stewart, Kelly v. USAA Email w/ E. Normand re calculating sales tax and title fee damages, communicating to USAA in advance of mediation and altering last offer to include 100% of unpaid/underpaid title fees and upcoming Zoom w/ opposing counsel to go over sales tax calculations (0.2); Participate in Zoom conference w/ opposing counsel and USSA in-house counsel and co-counsel for in-house counsel to explain USAA's calculation of sales tax (0.5). Total 0.7	Roger L. Mandel	\$950.00	0.7	\$665.00			0.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/21/2022	8:22 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re sales Tax, etc.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/22/2022	5:07 PM	Stewart, Kelly v. USAA Legal research on hypothetical defenses. Pull all case law and circulate memo on same.	Kyle W. Woodford	\$295.00	2	\$590.00			2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/29/2022	6:43 AM	Stewart, Kelly v. USAA Email to E. Normand requesting spreadsheets from USAA re sales tax and status of their and our expert's review of same and to set up meeting to prepare for continuation of mediation. Total 0.2	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11/29/2022	8:26 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re spreadsheets.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/1/2022	8:10 AM	Stewart, Kelly v. USAA Follow up email to E. Normand and mediation team re sales tax information and scheduling Zoom to prepare for 12/12 mediation continuation. Total 0.1	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
12/1/2022	8:28 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re follow up email.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/9/2022	8:10 AM	Stewart, Kelly v. USAA Email w/ E. Normand re status of sales tax review and new settlement term sheet (0.1); Review new settlement terms sheet and compare to parties' positions at end of last mediation (0.3); T/c re same w/ S. Jeeves (0.1). Total 0.5	Roger L. Mandel	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/9/2022	8:29 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re sales tax; conference call with R. Mandel.	Scott R. Jeeves	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/12/2022	8:11 AM	Stewart, Kelly v. USAA Participate in mediation part two (6.5); Review and revise updated spreadsheet provided by S. Edelsberg and email to co-counsel re same (0.5); Review prior briefing and prepare summary of case authorities on why our plaintiffs who received sales tax are typical of class members who did not and email to E. Normand re same to use with opposing counsel in follow up negotiations (0.4). Total 7.4	Roger L. Mandel	\$950.00	7.4	\$7,030.00			7.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/12/2022	8:36 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re updated spreadsheet.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/14/2022	5:06 PM	Stewart, Kelly v. USAA T/c with Scott Jeeves on mediation status.	Kyle W. Woodford	\$295.00	0.2	\$59.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/14/2022	6:40 AM	Stewart, Kelly v. USAA T/C with K. Woodford re status.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/20/2022	8:11 AM	Stewart, Kelly v. USAA Email to co-counsel re status of updated settlement summary and follow up w/ opposing counsel. Total 0.1	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/20/2022	8:38 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re settlement.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/27/2022	8:12 AM	Stewart, Kelly v. USAA T/c w/ E. Normand re latest communications w/ USAA's counsel and their sales tax proposal (0.2); Review class certification order in Geico/Desai to see if it held, as claimed by USAA's counsel, plaintiffs who were paid a component of ACV don't have standing to pursue it for those who were not (0.1); Email to S. Edelsberg recapping my understanding of where things stand, our position on the sales tax proposal and how to respond, and requesting to see a draft of written response before it is sent (0.4). Total 0.7	Roger L. Mandel	\$950.00	0.7	\$665.00			0.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/27/2022	8:40 AM	Stewart, Kelly v. USAA Reviewed and responded to emails.	Scott R. Jeeves	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
12/29/2022	8:12 AM	Stewart, Kelly v. USAA T/c w/ e. Normand re apparent agreement with USAA on class relief and following steps in nailing down term sheet, negotiating fees and class rep awards, drafting settlement agreement, and drafting motion for preliminary approval (0.7); Email to S. Jeeves and C. Rothburd re same (0.2). Total 0.9	Roger L. Mandel	\$950.00	0.9	\$855.00			0.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12/29/2022	8:41 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re term sheets.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/3/2023	9:19 AM	Stewart, Kelly v. USAA Review revised terms sheet from E. Normand and email between him and R. Max, mediator, re presenting it to USAA. Total 0.5	Roger L. Mandel	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/6/2023	9:19 AM	Stewart, Kelly v. USAA Review term sheet as revised by USAA and email w/ co-counsel re changes being acceptable. Total 0.3	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/6/2023	8:43 AM	Stewart, Kelly v. USAA Review Term sheet.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/11/2023	5:06 PM	Stewart, Kelly v. USAA Review term sheet and provide edits to Scott Jeeves.	Kyle W. Woodford	\$295.00	1.2	\$354.00			1.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/18/2023	9:20 AM	Stewart, Kelly v. USAA T/c w/ A. Shamis re status of settlement negotiations. Total 0.1	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/26/2023	11:59 AM	Stewart, Kelly v. USAA Review term sheet edits from Thomas Sanders.	Kyle W. Woodford	\$295.00	0.4	\$118.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/26/2023	9:20 AM	Stewart, Kelly v. USAA T/c w/ E. Normand re settlement of case and procedures to follow in getting preliminary approval and substantive requirements for same and issues related to ultimate final approval (0.8); Email w/ co-counsel re same (0.2). Total 1.0	Roger L. Mandel	\$950.00	1	\$950.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/26/2023	8:45 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re settlement.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
1/30/2023	9:20 AM	Stewart, Kelly v. USAA Review calendar and pleadings to see if status conference scheduled for today (0.2); Research on new judge (0.3); Leave voicemail for and email to court clerk re whether status conference set for today (0.1); T/c w/ E. Normand re same and whether to request conference and logistics going forward (0.2); T/c w/ court clerk re assignment of case as complex, case status, steps coming up and trying to schedule status conference with court (0.2); Email w/ E. Normand and co-counsel re same (0.2); T/c with court clerk re having status conference this morning (0.1); T/c w/ E. Normand re same (0.1); Prepare for call (0.2); Video status conference w/ Court (0.2); Email w/ co-counsel re results of conference and follow up work (0.2). Total 1.9	Roger L. Mandel	\$950.00	1.9	\$1,805.00			1.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
2/9/2023	9:48 AM	Stewart, Kelly v. USAA Email to co-counsel re status of motion for preliminary approval and sending example from Texas federal court. Total 0.2	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/9/2023	8:46 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re status of Motion for preliminary approval.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/10/2023	9:49 AM	Stewart, Kelly v. USAA Review and revise motion for preliminary approval and email to co-counsel re same. Total 4.1	Roger L. Mandel	\$950.00	4.1	\$3,895.00			4.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/10/2023	8:47 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Motion for preliminary approval.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/10/2023	11:55 AM	Stewart, Kelly v. USAA Review MPA sent over by Jake Phillips.	Kyle W. Woodford	\$295.00	0.5	\$147.50			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/11/2023	9:50 AM	Stewart, Kelly v. USAA Review and revise order granting preliminary approval (2.2); Email w/ co-counsel re same and re: schedule for post-preliminary approval events (0.3). Total 3.5	Roger L. Mandel	\$950.00	3.5	\$3,325.00			3.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/11/2023	8:48 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re scheduling post-preliminary approval.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/13/2023	9:50 AM	Stewart, Kelly v. USAA Email w/ co-counsel re: schedule for getting preliminary approval motion and order approved by opposing counsel and on file today and how today was set as deadline and requesting court for extension on same and moving back fairness hearing date. Total 0.3	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/13/2023	8:49 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re scheduling.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/15/2023	9:51 AM	Stewart, Kelly v. USAA Email w/ co-counsel re status of preliminary approval motion and order and need to email court re: when filing will take place and moving back fairness hearing if motion and order not ready to file today or tomorrow. Total 0.2	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/15/2023	8:50 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re status.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name</i> <i>Explanation</i>	<i>User</i>	<i>Hourly</i> <i>Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours</i> <i>Worked</i>	<i>Billable</i> <i>Time</i>	<i>Billed</i>	<i>Billed</i> <i>Date</i>
2/20/2023	9:51 AM	Stewart, Kelly v. USAA Email w/ co-counsel re status of settlement agreement, motion for preliminary approval, and preliminary approval order and my inquiring of opposing counsel re status of settlement agreement. Total 0.1	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/20/2023	8:50 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re status of settlement agreement.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/21/2023	9:51 AM	Stewart, Kelly v. USAA Email w/ opposing counsel re his status on responding re: settlement agreement and email w/ co-counsel re same and re circulating next versions of motion and order. Total 0.2	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/21/2023	8:51 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re settlement agreement.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/27/2023	9:53 AM	Stewart, Kelly v. USAA Review and revise settlement agreement as revised by opposing counsel (5.5); Email w/ co-counsel re same and re issues with his changes to notice forms (0.3). Total 5.8	Roger L. Mandel	\$950.00	5.8	\$5,510.00			5.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/27/2023	8:51 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re settlement agreement.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/28/2023	9:53 AM	Stewart, Kelly v. USAA Email w/ co-counsel and opposing counsel re obtaining re-lined versions of notice forms from opposing counsel and setting up Zoom to go over them. Total 0.2	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2/28/2023	8:52 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Notice forms.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/1/2023	11:06 AM	Stewart, Kelly v. USAA Review and revise postcard notice and long form notice as revised by opposing counsel (2.1); Email w/ co-counsel re same (0.3). Total 2.4	Roger L. Mandel	\$950.00	2.4	\$2,280.00			2.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/1/2023	8:53 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re postcard notice.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/8/2023	11:07 AM	Stewart, Kelly v. USAA Email w/ co-counsel re status of settlement agreement and motion for preliminary approval (0.1); T/c w/ E. Normand re same (0.1). Total 0.2	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/8/2023	8:53 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re status of settlement agreement.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
3/15/2023	11:07 AM	Stewart, Kelly v. USAA Review and revise latest versions of the settlement agreement, long form notice and postcard notice and email w/ co-counsel re same (4.2); Review and revise motion for preliminary approval and preliminary approval order and email with co-counsel re same (1.6). Total 5.8	Roger L. Mandel	\$950.00	5.8	\$5,510.00			5.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/15/2023	8:54 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re re settlement agreement.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/16/2023	11:08 AM	Stewart, Kelly v. USAA Continue review and revision of motion for preliminary approval. Total 1.8	Roger L. Mandel	\$950.00	1.8	\$1,710.00			1.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/17/2023	11:08 AM	Stewart, Kelly v. USAA Email w/ Paris counsel as to whether J. Phillips had started declaration in support of motion for preliminary approval. Total 0.1	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/17/2023	8:55 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Paris.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/20/2023	11:09 AM	Stewart, Kelly v. USAA Review and revise motion for preliminary approval, order granting preliminary approval and long form notice and begin same for settlement agreement and email w/ Paris counsel re same. Total 5.6	Roger L. Mandel	\$950.00	5.6	\$5,320.00			5.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/20/2023	8:56 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re preliminary approval.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/21/2023	11:09 AM	Stewart, Kelly v. USAA Continue review and revise settlement agreement and further review and revision of motion for preliminary approval, order granting preliminary approval and long form notice to make them all internally consistent and consistent with each other and to correct awkward and incorrect phrasing (6.8); T/c's with Settlement Administrator re various aspects of settlement timing and procedure (0.2). Total 7.0	Roger L. Mandel	\$950.00	7	\$6,650.00			7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/22/2023	5:40 PM	Stewart, Kelly v. USAA Review revised settlement agreement and longform notice.	Kyle W. Woodford	\$295.00	0.3	\$88.50			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/22/2023	11:10 AM	Stewart, Kelly v. USAA Email to opposing counsel sending all documents and follow up email w/ them re same. Total 0.2	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/22/2023	9:00 AM	Stewart, Kelly v. USAA Reviewed and responded to emails.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
3/27/2023	11:10 AM	Stewart, Kelly v. USAA Review email from opposing counsel to settlement administrator checking on sufficiency of proposed notice schedule and email to administrator re settlement website URL (0.1); Review proposed revisions to settlement agreement and long form notice received from opposing counsel and further review and revise same and email to opposing counsel re same (5.2). Total 5.3	Roger L. Mandel	\$950.00	5.3	\$5,035.00			5.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/27/2023	9:03 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re settlement website.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/27/2023	5:40 PM	Stewart, Kelly v. USAA Review our teams changes to USAA settlement agreement and the longform notice.	Kyle W. Woodford	\$295.00	0.8	\$236.00			0.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/29/2023	11:11 AM	Stewart, Kelly v. USAA Email w/ co-counsel re status of settlement documents and him preparing claim forms and review email between him and opposing counsel re claim forms. Total 0.2	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/29/2023	9:03 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re status of settlement documents.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/30/2023	11:11 AM	Stewart, Kelly v. USAA Review draft of claim form received from co-counsel and email w/ him and settlement administrator re forms of claim form (printable and fill in in and mail) and electronic submission that are needed and t/c with co-counsel re same and review and revise an additional form received from co-counsel and review and revise postcard notice and email w/ opposing counsel re same and re process for finalizing settlement documents and getting settlement agreement executed (1.2); Email w/ opposing counsel and settlement administrator re settlement website URL (0.2). Total 1.4	Roger L. Mandel	\$950.00	1.4	\$1,330.00			1.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/30/2023	9:04 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re settlement.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/31/2023	11:12 AM	Stewart, Kelly v. USAA Email w/ opposing counsel re J. Ostrow being included in emails in error. Total 0.1	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3/31/2023	9:05 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re J. Ostrow.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/3/2023	10:17 AM	Stewart, Kelly v. USAA Email to co-counsel, opposing counsel and settlement administrator re not including Jeff Ostrow on future emails (0.1); Email w/ co-counsel re logistics on using DocuSign to obtain execution of settlement agreement by clients and lawyers (0.2); Email to opposing counsel re status of their final review of settlement agreement and exhibits (0.1); Email w/ opposing counsel re how electronic claim form on website will work (0.1). Total 0.5	Roger L. Mandel	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
4/3/2023	9:05 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re settlement agreement.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/4/2023	10:17 AM	Stewart, Kelly v. USAA Review claim forms and revisions to settlement agreement and long form notice received from opposing counsel in preparation for Zoom meeting re same with opposing counsel (0.3); Zoom meeting w/ opposing counsel re same (0.1); Review and revise long form notice (0.1); Review and revise settlement agreement and email to opposing counsel re same (0.2); Review revised settlement agreement received from opposing counsel and make further and final revisions (0.2); Email w/ co-counsel re client email addresses and status of their contacts with them about forthcoming agreement to sign (0.2); Email to K. Hill re preparing execution copy of agreement and exhibits and sending out via Docusign (0.2); Review and revise two execution version of Settlement Agreement w/exhibits and t/c w/ H. Hill re same (0.3). Total 1.6	Roger L. Mandel	\$950.00	1.6	\$1,520.00			1.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/5/2023	10:18 AM	Stewart, Kelly v. USAA Review revised unopposed motion for preliminary approval received from opposing counsel and further revise same. Total 1.3	Roger L. Mandel	\$950.00	1.3	\$1,235.00			1.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/6/2023	10:19 AM	Stewart, Kelly v. USAA Further review and revision to preliminary approval motion (0.2); Email to K. Hill re further required revisions (0.1); Review revised preliminary approval order received from opposing counsel and further revise same (0.9); T/c w/ K. Woodford re further additions to both documents (0.1); Email w/ K. Hill re sending settlement agreement via Docusign and hold up w/ Micah Simon (0.1); Email to co-counsel re getting Simon's signature (0.1). Total 1.3	Roger L. Mandel	\$950.00	1.3	\$1,235.00			1.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/6/2023	9:07 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re client signatures.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/11/2023	10:19 AM	Stewart, Kelly v. USAA Email w/ co-counsel re status of settlement agreement and getting Simon's signature and t/c w/ office re resending to Simon. Total 0.2	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/11/2023	9:10 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re settlement agreement.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/12/2023	10:20 AM	Stewart, Kelly v. USAA T/c's w/ office and determine that wrong emails were used and re resending to everyone w/ simultaneous signatures and re progress in signing and emails re same (0.3); Email w/ co-counsel re same (0.2); T/c and email w/ opposing counsel re issues w/ USSA counsel signing and t/c w/ office re fixing and resending (0.2). Total 0.7	Roger L. Mandel	\$950.00	0.7	\$665.00			0.7	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/13/2023	10:20 AM	Stewart, Kelly v. USAA Final review and revision of preliminary approval motion and order (1.2); Email w/ opposing counsel re same (0.1). Total 1.3	Roger L. Mandel	\$950.00	1.3	\$1,235.00			1.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/14/2023	10:20 AM	Stewart, Kelly v. USAA Draft my declaration in support of the motion for preliminary approval (1.6); Email w/ co-counsel re same (0.2). Total 1.8	Roger L. Mandel	\$950.00	1.8	\$1,710.00			1.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
4/18/2023	10:21 AM	Stewart, Kelly v. USAA Review revised preliminary approval received from opposing counsel and make final revisions to it and preliminary approval order and my declaration in support and email them to opposing counsel and email with opposing counsel re same and make one further revision based on same (1.2); Email w/ office re putting motion together and logistics on filing motion and order (0.2); Email w/ opposing counsel and Epiq, settlement administrator re scheduling initial meeting (0.2). Total 1.6	Roger L. Mandel	\$950.00	1.6	\$1,520.00			1.6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/18/2023	9:30 AM	Stewart, Kelly v. USAA Reviewed and responded to emails on Order etc.	Scott R. Jeeves	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/19/2023	10:21 AM	Stewart, Kelly v. USAA Email to Court providing file-stamped motion and order and explaining need to fill in Final Approval Hearing date in order and timing on same. Total 0.3	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/19/2023	9:16 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Stamped Motion.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/21/2023	10:22 AM	Stewart, Kelly v. USAA Email w/ Ed Normand re status of preliminary approval order and setting final approval hearing. Total 0.1	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/21/2023	9:18 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re status.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/22/2023	10:23 AM	Stewart, Kelly v. USAA Email w/ opposing counsel and Epiq re scheduling initial meeting. Total 0.1	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/22/2023	9:20 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re meeting with Epiq.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/26/2023	10:23 AM	Stewart, Kelly v. USAA Zoom with opposing counsel and Epiq re notice process and issues (0.6); T/c w/ opposing counsel re what data USAA needs to provide to Epiq (0.1); T/c w/ Court Coordinator re need for Judge to sign proposed preliminary approval order, date to be filled in for final approval hearing and when Judge can review and entry into system and our need to retrieve entered order (0.3). Total 1.0	Roger L. Mandel	\$950.00	1	\$950.00			1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/26/2023	9:23 AM	Stewart, Kelly v. USAA Reviewed and responded to emails.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4/27/2023	10:24 AM	Stewart, Kelly v. USAA Email w/ E. Normand re status of preliminary approval order and schedule (0.2); Review email from coordinator re whether Final Approval hearing scheduled for today is going forward, email from opposing counsel re his conversation w/ coordinator, email in response re prior communications w/ coordinator and leave voicemail for coordinator (0.3). Total 0.5	Roger L. Mandel	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
4/27/2023	7:46 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re Final Approval Hearing.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/9/2023	9:37 AM	Stewart, Kelly v. USAA Research previous communications w/ Court re execution of preliminary approval order and email to court coordinator summarizing same and inquiring about status of entry of order and whether Judge has questions or issues and offering Zoom hearing if so. Total 0.5.	Roger L. Mandel	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/14/2023	10:21 AM	Stewart, Kelly v. USAA Email to Court providing file-stamped motion and order and explaining need to fill in Final Approval Hearing date in order and timing on same. Total 0.3	Kay Hill	\$175.00	0.1	\$17.50			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/16/2023	3:22 PM	Stewart, Kelly v. USAA Emails re case status.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/16/2023	9:45 AM	Stewart, Kelly v. USAA T/c w/ opposing counsel re status of preliminary approval order and possibly submitting joint motion for status conference and failed attempt to call Court together (0.2); T/c w/ opposing counsel re his conversation re order with court coordinator (0.1). Total 0.3	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/22/2023	9:46 AM	Stewart, Kelly v. USAA Review email from court coordinator requesting revised preliminary approval order and email w/ opposing counsel re other necessary changes and getting new order on file (0.2); Email and t/c w/ k. Hill re preparing revised order and review and approve same (0.2). Total 0.4	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/22/2023	6:42 PM	Stewart, Kelly v. USAA Made changes and filed proposed Agreed Preliminary Approval Order	Kay Hill	\$175.00	0.2	\$35.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/23/2023	9:48 AM	Stewart, Kelly v. USAA Review file-stamped unsigned preliminary approval order and email w/ opposing counsel re submitting it directly to coordinator (0.1); Review order and calculate earliest date for final approval hearing (0.1); Email to court coordinator sending her order and explaining places where final approval hearing date needs to be filled in and earliest possible date for hearing (0.2). Total 0.4	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/30/2023	3:24 PM	Stewart, Kelly v. USAA Reviewed updates re final approval hearing.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/30/2023	9:49 AM	Stewart, Kelly v. USAA T/c w/ court coordinator re Judge signing order today and what date to fill in for Final Approval Hearing 0.1	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5/31/2023	2:46 PM	Stewart, Kelly v. USAA Reviewed agreed order preliminary approving settlement and directing notice to the class.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
5/31/2023	9:49 AM	Stewart, Kelly v. USAA Review preliminary approval order signed by Court and t/c w/ K. Hill re preparing schedule of upcoming deadlines based on same and calendaring (0.1); Review schedule and email to settlement administrator, co-counsel and opposing counsel re same (0.1). Total 0.2	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/1/2023	1:18 PM	Stewart, Kelly v. USAA Reviewed email re settlement administrator.	Scott R. Jeeves	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/1/2023	9:50 AM	Stewart, Kelly v. USAA Review entered Preliminary Approval Order (0.1); T/c w/ K. Hill re preparing schedule based on order to circulate and calendaring same (0.1); Review email from K. Hill re same and email from opposing counsel re needed revisions to same and email to K. Hill re correcting same and recirculating (0.1); Email w/ Settlement Administrator re scheduling meeting with us and opposing counsel to go over notice program (0.1). Total 0.4	Roger L. Mandel	\$950.00	0.4	\$380.00			0.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/5/2023	1:19 PM	Stewart, Kelly v. USAA Reviewed emails of fee petition.	Scott R. Jeeves	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/5/2023	1:21 PM	Stewart, Kelly v. USAA Discussed with Roger administrator emails.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/5/2023	9:50 AM	Stewart, Kelly v. USAA FEES: Email with co-counsel re the drafting of fee petition Total 0.3. Video meeting with settlement administrator and opposing counsel to discuss notice and claim program issues (0.4); Review notice and claim forms and send them to settlement administrator in word form (0.2). Total 0.9	Roger L. Mandel	\$950.00	0.9	\$855.00			0.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/5/2023	5:17 AM	Stewart, Kelly v. USAA Reviewed and Responded to emails re fee petition	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/22/2023	5:58 PM	Stewart, Kelly v. USAA Reviewed and responded to emails.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/29/2023	9:51 AM	Stewart, Kelly v. USAA FEES: Email with co-counsel re drafting of fee petition and me providing Texas law memorandum. (0.2) Email w/ settlement administrator and opposing counsel re who registered settlement website and transfer to administrator. Total 0.1.	Roger L. Mandel	\$950.00	0.3	\$285.00			0	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/29/2023	5:18 AM	Stewart, Kelly v. USAA Reviewed and Responded to emails re fee petition	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6/30/2023	9:53 AM	Stewart, Kelly v. USAA Email w/ Epiq, settlement administrator, re timing of events leading up to giving of notice. Total 0.2.	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
6/30/2023	5:18 AM	Stewart, Kelly v. USAA Reviewed and Responded to emails re fee petition.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/1/2023	6:03 PM	Stewart, Kelly v. USAA Email with settlement administrator, opposing counsel and co-counsel re whether to allow open online claim filing. Total 0.5	Roger L. Mandel	\$950.00	0.5	\$475.00			0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/1/2023	5:19 AM	Stewart, Kelly v. USAA Reviewed and Responded to emails re settlement	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/2/2023	9:57 AM	Stewart, Kelly v. USAA Email with co-counsel re whether to allow open online claim filing. Total 0.1	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/2/2023	5:20 AM	Stewart, Kelly v. USAA Reviewed and Responded to emails re online claim form.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/3/2023	9:57 AM	Stewart, Kelly v. USAA Review settlement agreement and determine that it provides for open online claim filing and email with settlement administrator, opposing counsel and co-counsel re same and reaching agreement to allow same. Total 0.6.	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/3/2023	5:21 AM	Stewart, Kelly v. USAA Reviewed and Responded to emails re settlement	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/13/2023	9:58 AM	Stewart, Kelly v. USAA Review drafts of class action settlement website, IVR phone script and three different versions of postcard notice (1.9); T/c re same and re data issues that USAA is having with T. Sanders, opposing counsel (0.2); Detailed email to settlement administrator re all of same (0.3); Email with settlement administrator further explaining why only two forms of post card notice are needed, not three (0.1); Review opposing counsel's proposed changes to documents (0.7). Total 3.2	Roger L. Mandel	\$950.00	3.2	\$3,040.00			3.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/13/2023	5:21 AM	Stewart, Kelly v. USAA Reviewed and Responded to emails re settlement drafts	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/14/2023	9:59 AM	Stewart, Kelly v. USAA Preliminary review of initial portion of class data provided by USAA Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/19/2023	10:27 AM	Stewart, Kelly v. USAA Email with opposing counsel re status of additional class data being produced (0.1); Preliminary review of two sets of additional class data produced by USAA, one for settlement administrator without data to calculate damages (because calculations to be performed by USAA) and one for class counsel with that data (0.7); Email with co-counsel and opposing counsel regarding why there are two different data sets (0.1). Total 0.9.	Roger L. Mandel	\$950.00	0.9	\$855.00			0.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name</i> <i>Explanation</i>	<i>User</i>	<i>Hourly</i> <i>Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours</i> <i>Worked</i>	<i>Billable</i> <i>Time</i>	<i>Billed</i>	<i>Billed</i> <i>Date</i>
7/19/2023	5:22 AM	Stewart, Kelly v. USAA Reviewed and Responded to emails re additional class data.	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/20/2023	10:28 AM	Stewart, Kelly v. USAA Email w/ settlement administrator re status of revised website, IVR script and notices (0.1); Review and revise claim form circulated by settlement administrator as revised by opposing counsel (0.5); Email with them and co-counsel re same (0.1). Total 0.7	Roger L. Mandel	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/26/2023	10:29 AM	Stewart, Kelly v. USAA Review email from settlement administrator re revised drafts of websites, IVR script and notices and email with opposing counsel re them revising first to be followed by me (0.2); Review and revise drafts of websites, IVR script and notices and email to settlement administrator and opposing counsel re same (1.6). Total 1.8	Roger L. Mandel	\$950.00	1.8	\$1,710.00			1.8	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/26/2023	10:30 AM	Stewart, Kelly v. USAA FEES. Email with co-counsel re deadline for filing fee and cost motion, preparation of fee and cost summaries and internal deadlines for same, my providing Texas laws and what supporting affidavits will be needed (1.0); Email to K. Hill re preparing timekeeper and cost summary (0.2); Email w/ C. Rothburd re is timekeeper summary and hourly rates (0.2) Total 1.4	Roger L. Mandel	\$950.00	1.4	\$1,330.00			1.4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/26/2023	5:16 AM	Stewart, Kelly v. USAA Reviewed and Responded to emails re settlement and website	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/27/2023	8:57 AM	Stewart, Kelly v. USAA Reviewed and responded to emails re claims forms.	Scott R. Jeeves	\$950.00	0.1	\$95.00			0.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/27/2023	10:30 AM	Stewart, Kelly v. USAA Review and revise revised email content and multiple versions of post card notices and email w/ settlement administrator and opposing counsel re same and t/c re same w/ opposing counsel Total 2.0	Roger L. Mandel	\$950.00	2	\$1,900.00			2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/27/2023	10:31 AM	Stewart, Kelly v. USAA FEES: Legal research re Texas law on attorneys fees and costs to support fee petition (3.8); Draft lengthy email to co-counsel re El Apple case and need to file billing records in support of fee declarations and to exercise billing judgment on billing records and proposing method to do same and how to give up topics in supporting declarations (0.4); Follow up email re same with co-counsel (0.3); Draft memo re Texas law re fees and costs and email to co-counsel (2.2). Total 6.9	Roger L. Mandel	\$950.00	6.9	\$6,555.00			6.9	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/28/2023	10:33 AM	Stewart, Kelly v. USAA Review revised postcard notice forms and email w/ settlement administrator and opposing counsel re necessary changes. Total 0.3.	Roger L. Mandel	\$950.00	0.3	\$285.00			0.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/30/2023	10:33 AM	Stewart, Kelly v. USAA Review revised version of one of the postcard notices and email to settlement administrator re need to see other one. Total 0.2	Roger L. Mandel	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7/30/2023	5:15 AM	Stewart, Kelly v. USAA Reviewed and Responded to emails re settlement documents	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

<i>Date</i>	<i>Time</i>	<i>Case Name Explanation</i>	<i>User</i>	<i>Hourly Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Task Code</i>	<i>Activity Code</i>	<i>Hours Worked</i>	<i>Billable Time</i>	<i>Billed</i>	<i>Billed Date</i>
7/31/2023	10:34 AM	Stewart, Kelly v. USAA	Roger L. Mandel	\$950.00	2.3	\$2,185.00			2.3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Review and approve final versions of postcard notices and email w/ settlement administrator and opposing counsel re same (0.3); Begin preparing chronology of key case events t use in preparing motion for final approval and supporting declarations (2.0). Total 2.3.												
7/31/2023	5:14 AM	Stewart, Kelly v. USAA	Scott R. Jeeves	\$950.00	0.2	\$190.00			0.2	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Reviewed and Responded to emails re settlment materials.												

Total Hours Worked:

Total Billable Hours:

Total Billable Amount:

TIMEKEEPER	POSITION	YEAR ADMITTED TO PRACTICE	HOURLY RATE	NUMBER OF HOURS	LODSTAR
Roger Mandel	Attorney	1987	\$950.00	582.8	\$553,660.00
Scott Jeeves	Attorney	1991	\$950.00	106.0	\$100,700.00
Kyle Woodford	Attorney	2021	\$295.00	92.9	\$27,405.50
Kay Hill	Paralegal	1998*	\$175.00	1.70	\$297.50
					\$682,063.00

*Year Began Working as a Paralegal

EXHIBIT D

Jeeves Law Group, PA Costs Advanced in Stewart v. USAA

<u>Date</u>	<u>Task Cose</u>	<u>Pavee</u>	<u>Description</u>	<u>Cost</u>	<u>Account Check #</u>	<u>True Up Normand offset</u>	<u>True Up Shamis offset</u>
8/3/2023	Data management	CS Disco	Invoice dated 8/1/23	\$ 507.45	American cc		
7/13/2023	Data management	CS Disco	Invoice 301076 dated 7/1/23	\$ 507.45	American cc		
6/16/2023	Data management	CS Disco	Invoice 282331 dated 6/1/23	\$ 507.45	American cc		
5/22/2023	Court filing fee	TXeFile	Court filing fee	\$ 4.00	American cc		
5/6/2023	Data management	CS Disco	Invoice 241966 dated 5/1/23	\$ 507.45	American cc		
4/19/2023	Research overage	Trebill	Docket research/review outside plan	\$ 52.00	BofA		
4/18/2023	Court filing fee	TXeFile	Court filing fee	\$ 4.00	American cc		
4/12/2023	Data management	CS Disco	Invoice 228130 dated 4/1/23	\$ 507.45	American cc		
3/9/2023	Data management	CS Disco	Invoice 218811 dated 3/1/23	\$ 507.45	American cc		
2/9/2023	Data management	CS Disco	Invoice 214135 dated 2/1/23	\$ 507.45	American cc		
1/10/2023	Data management	CS Disco	Invoice dated 1/1/23	\$ 507.45	American cc		
12/8/2022	Data management	CS Disco	Invoice 204928 dated 12/1/22	\$ 483.29	American cc		
11/8/2022	Data management	CS Disco	Invoice 200438 dated 11/1/22	\$ 501.32	American cc		
12/16/2022	Mediation Fee 12/12/22	Upchurch Watson White & Max	Invoice dated 12/15/22	\$ 1,875.00	C/A Check #614		
11/7/2022	Mediation Fee 11/3/22	Upchurch Watson White & Max	Invoice dated 11/2022	\$ 2,500.00	C/A Check #552		
11/2-11/4/22	Miami Mediation Travel	Airport transfers/Ubbers	Airport transfers/Ubbers	\$ 108.69	BofA cc		
11/3/2022	Miami Mediation Travel	Meals	Meals lunch & dinner for team	\$ 810.00	BofA cc		
11/2/2022	Miami Mediation Travel	Meals	Meals/dinners for team	\$ 330.14	BofA cc		
10/31/2022	Expert	The Fontana Group	Invoice 19398 dated 10/19/22	\$ 31,125.85	C/A Check #556		
10/26/2022	Miami Mediation Travel	American Airlines	SRJ TPA/MIA flights mediation	\$ 631.52	American cc		
10/26/2022	Miami Mediation Travel	American Airlines	RLM DFW/MIA flights mediation	\$ 525.19	BofA		
10/13/2022	Court filing fee	TXeFile	Reply to Class Cert Motion	\$ 4.00	American cc		
10/11/2022	Data management	CS Disco	Invoice 196105 dated 10/7/22	\$ 454.76	American cc		
10/10/2022	Mediation Travel	Kimpton Epic hotel Miami	SRJ Miami Mediation hotel	\$ 941.67	American cc		
10/10/2022	Mediation Travel	Kimpton Epic hotel Miami	RLM Miami Mediation hotel	\$ 940.11	RLM American cc		
9/22/2022	Transcript	Compass Reporting Group	Transcript expert J. Tomlin	\$ 1,476.80	C/A Check #508		
9/9/2022	Data management	CS Disco	Invoice 191860 dated 9/1/22	\$ 351.79	American cc		
7/14/2022	Expert	The Fontana Group	Invoice 19290 dated 7/11/22	\$ 5,835.08	C/A Check #414		
6/17/2022	Transcript	Magna Legal Services	Transcript of expert Stockton	\$ 1,125.85	C/A Check # 398		
6/9/2022	Expert	The Fontana Group	Invoice 19241 dated 6/8/22	\$ 250.80	C/A Check # 393		
5/12/2022	Expert	The Fontana Group	Invoice 19141 dated 5/10/22	\$ 17,453.38	C/A Check #367		
3/14/2022	Data management	CS Disco	Invoice 148374 dated 11/1/2021	\$ 250.00	American cc		
2/10/2022	Data management	CS Disco	Invoice 159095 dated 2/1/2022	\$ 250.00	American cc		
2/8/2022	Expert	The Fontana Group	Invoice 19040 dated 2/4/22	\$ 1,993.50	C/A Check #282		
2/1/2022	Costs True Up	JLG	Offset from Normand, PLLC of Fontana Invoice 18991			\$ (2,839.92)	
2/1/2022	Costs True Up	JLG	Offset Shamis & Gentile, PA of Fontana Invoice 18991				\$ (5,840.58)
1/25/2022	Data management	CS Disco	Invoice 155451 dated 1/1/2022	\$ 250.00	American cc		
1/14/2022	Expert Fee	The Fontana Group	Invoice 18991 dated 1/6/22 for \$11,553.12	\$ 11,553.12	C/A Check #259		
7/23/2021	Costs True Up	Normand, PLLC	Half of Normand's costs in Arevalo per 7/2	\$ 3,001.56	C/A Check 19280		
2021-2022	Court filing fee	TXeFile	Initial & indiv. court filing fees	\$ 643.43	American cc		
7/22/2021	File Admin			\$ 1,000.00			
				\$ 85,682.24		\$ (2,839.92)	\$ (5,840.58)

EXHIBIT 2

CAUSE NO. 2020-CI-16240

VIVIAN AREVALO, and MICAH SIMON, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

USAA CASUALTY INSURANCE COMPANY, and GARRISON PROPERTY & CASUALTY INSURANCE COMPANY,

Defendants.

§ IN THE DISTRICT COURT
§
§
§
§ OF BEXAR COUNTY, TEXAS
§
§
§
§
§
§
§ 285th JUDICIAL DISTRICT
§
§

DECLARATION OF CRAIG E. ROTHBUIRD IN SUPPORT OF CLASS COUNSEL’S MOTION FOR APPROVAL OF ATTORNEYS’ FEE AWARD AND REIMBURSEMENT OF COSTS

I, Craig E. Rothburd, declare as follows:

1. I am a shareholder in the law firm of Craig E. Rothburd, P.A., and co-counsel of record for the Plaintiffs (“Plaintiff”), in the above action, which was filed as a class action.

2. I have responsibility for this litigation and have personal knowledge as to all matters set forth in this Affidavit.

3. I graduated with honors from the University of Florida, College of Law, in December 1994. I am a member in good standing of the Florida Bar and have been since May of 1995. I have received the highest rating offered by Martindale-Hubbell in the area in which I practice as well as ethics and professionalism.

4. I have over 28 years of litigation practice experience with a focus on complex business, corporate, real estate, and class action litigation. This case was taken on a contingent basis with my fees to be determined by the court, based on my over 28 years of experience as a

licensed attorney, my extensive experience in complex and class action litigation in both state and federal courts. A copy of my *curriculum vitae* is attached as **Exhibit “A”** outlining in greater detail my experience. My role in this litigation was as co-counsel and involved responsibility for the research, writing, planning and strategy in all phases of the above styled case.

5. I have been approved as class counsel in numerous cases as well as lectured on the topic many times, some of which are identified on the attached **Exhibit A**.

6. The information contained in my firm’s time records were made contemporaneously by the timekeeper who entered the time and were kept in my firm’s ordinary course of business.

7. I am familiar with the fees and costs customarily charged by attorneys and allowed by courts for attorney fees and costs in similar cases both in Florida and throughout the United States. I know the reasonable value of those services, and I have been qualified and accepted as an expert witness on the issue of attorneys' fees and costs by circuit court judges in various counties throughout Florida as well as federal district judges in the Middle District of Florida. I also have lectured numerous times on the issue of attorney’s fees for continuing legal education credits both for the Florida Bar and nationally.

8. In formulating my opinions herein, I considered, among other things, the factors set forth in Texas Disciplinary Rule of Professional Conduct 1.04.

9. I also reviewed applicable case law, including, but not limited to, *Norman v. Housing Authority of City of Montgomery*, 836 F.2d 1292 (11th Cir. 1989), *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983), and *El Apple I, Ltd. v. Olivas*, 370 S.W.3d 757 (Tex. 2012)

10. In reviewing the contemporaneous billing records kept by the timekeepers for this matter, and when exercising reasonable billing judgment, I am of the opinion and belief that the hours billed by my firm are reasonable. See *Norman v. Housing Authority of City of Montgomery*,

836 F.2d 1292 (11th Cir. 1989); *see also Florida Drilling & Sawing v. Fohrman*, 635 So.2d 1054, 1055-56 (Fla. 4th DCA 1994). This is especially so as each of the firms retained by the Plaintiff performed in clearly defined roles with minimal duplication of time. Plaintiff’s counsel adopted a strict organizational plan to advance and resolve the claims in a time-efficient manner.

11. To account for any potential duplication of effort and in the furtherance of the exercise of billing judgment, I applied a reduction of 10% of the total time billed by each of my firm’s timekeepers. Attached hereto as **Exhibit B** are the edited contemporaneous time records after the deduction of the 10% billing judgment reduction.

12. Based on my over 28 years of experience and consistent with the fees charged in for similar class action work, my firm’s billing rates in this matter, **\$950.00** per hour for partner time and **\$350.00** for associate time, are usual, customary and reasonable rates in Florida and nationally for complex class action work of the type performed by my firm in this class action case based on the experience levels of the attorneys performing the work in this case.

13. The entries below identify the total contemporaneous billing records kept by each timekeeper at my firm for this matter and include projected time of 10 additional hours that I anticipate in bringing the case to conclusion, which based on my experience in handling class actions is usual, customary and reasonable.

Timekeeper	Actual Time	Projected Time	Total Time	Years Experience
Craig E. Rothburd, Esquire	48.5	10	58.5	28
Dylan Thatcher, Esquire	2.8	0	2.8	2
Billing Judgment Reduction 10%			55.2	

14. Based on the foregoing rates and using the time from the above chart, my firm’s lodestar after the exercise of billing judgment (reduced time by 6.1 hours) as of August 3, 2023, is **\$50,940.00**. In my opinion, the forgoing amounts of time for the services performed by Craig E.

Rothburd, P.A., through August 3, 2023, and projected to be performed through the end of this case are usual, customary, and reasonable.

My name is Craig E. Rothburd, my address is 320 W. Kennedy Blvd. Suite #700, Tampa, Florida 33606, United States of America. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Hillsborough County State of Florida, on the 4th day of August, 2023.

/s/Craig E. Rothburd
Craig E. Rothburd

EXHIBIT

A

CRAIG E. ROTHBURD, ESQUIRE

ATTORNEY AT LAW
320 W. KENNEDY BOULEVARD, SUITE 700
TAMPA, FLORIDA 33606
CRAIGEROTHBURDPA.COM

PROFESSIONAL EXPERIENCE

August 2005 - present: **CRAIG E. ROTHBURD, P.A.** - Tampa, Florida
Partner – Primary focus on complex business, consumer class action, corporate, healthcare and real estate law and litigation.

January 2004 – August 2005: **EDDY & ROTHBURD, P.A.** - Tampa, Florida
Partner – Primary focus, same as above.

May 1995 – December 2003: **ROBERT K. EDDY & ASSOCIATES, P.A.** - Tampa, Florida
Associate Attorney – Primary focus, on complex business, commercial, corporate, real estate, healthcare and creditor's rights law and litigation

EDUCATION

University of Florida, College of Law, - Gainesville, Florida
Juris Doctor, *with Honors*, December 1994.

University of Florida, - Gainesville, Florida
Bachelor of Science, December 1990

ADMISSIONS

Admitted to Practice in all Florida State Courts; United States District Courts for the Middle, Northern and Southern Districts of Florida; and United States Court of Appeal, Eleventh Circuit.

PROFESSIONAL AFFILIATIONS

National Association of Consumer Advocates (NACA) – *Membership Chairperson and member*; Consumer Protection Law Committee, The Florida Bar – *Past Chairperson*; The Florida Bar - *member*; Federal Bar Association, Middle District of Florida Chapter – *member*; Hillsborough County Bar Association - *member*; Trail Lawyers Sections of Florida Bar and Hillsborough County Bar Association - *member*; Florida Justice Association – *member*; Public Justice – *member*.

AWARDS, HONORS AND COMMUNITY ACTIVITIES

Awards and Honors

Bay Area Legal Services, *Judge Don Castor Justice Award (2019)*; The Florida Bar, *Consumer Protection Lawyer of the Year (2017)*; Thirteenth Judicial Circuit, *Special Recognition Award - (pro bono and cy pres)*; Homeless Coalition of Hillsborough County, *Homeless Hero – Advocacy*; Martindale-Hubbell, *AV™ rating*; AVVO, *10/10 rating*; Florida Trend magazine, *Legal Elite*; Florida's Superlawyers, *Superlawyer*; The National Law Journal, *Tampa's Top Lawyers*; Tampa Bay Magazine, *Tampa's Top Lawyers*

Community Activities

Bay Area Legal Services, Inc., *Director*; Bay Area Legal Services, *immediate past Development Council Chairperson*; Tampa Museum of Art, *Member*; Tampa Theatre, *Member*; Tampa Bay Performing Arts Centre, *Member*; and Gator Boosters, Inc, *Scholarship Club Member*.

SIGNIFICANT CERTIFIED CLASS CASES

South v. Progressive Select Insurance Company, Case No: 19-CV-21760. United States District Court, S.D. Fla., Ft. Lauderdale Division

Horneland v. US Bank, N.A., Case No.: 14-CA-001117. 13th Judicial Circuit, Hillsborough County, Florida

A Kaufman Clinic, Inc., et al. v. Nationwide General Insurance Company, et al., Case No.: 09-033393 CACE, 17th Judicial Circuit, Ft. Lauderdale, Florida

Total Care Chiropractic & MRI Associates of St. Pete, Inc. v. Mercury Ins. Co. of Florida, Case No.: 10-12853 CACE, 17th Judicial Circuit, Ft. Lauderdale, Florida

MRI Associates of St. Pete, Inc. v. Travelers Insurance Company, et al., Case No.: 10-CA-013131 Div. C 13th Judicial Circuit, Tampa, Florida

MRI Associates of St. Pete, Inc. v. First Acceptance Insurance Company, Case No.: 10-CA-03919 Div. F 13th Judicial Circuit, Tampa, Florida

MRI Associates of St. Pete, Inc. v. Metropolitan Casualty Insurance Company, Case No.: 10-CA-03921 Div. J 13th Judicial Circuit, Tampa, Florida

MRI Associates of St. Pete, Inc. v. Auto Club South Insurance Company, Case No.: 10-CA-013134 Div. J 13th Judicial Circuit, Tampa, Florida

MRI Associates of St. Pete, Inc. v. Dairyland Insurance Company, et al., Case No.: 8:11-cv-665-JSM-MAP United States District Court, M.D Fla., Tampa Division

MRI Associates of St. Pete, Inc. v. USAA Casualty Insurance Company et al., Case No.: 10-CA-016785 Div. D13th Judicial Circuit, Tampa, Florida

Advantage Open MRI, Inc. v. USAA Casualty Insurance Company, et al. Case No.: 08-11104 Div. F 13th Judicial Circuit, Tampa, Florida

MRI Associates of St. Pete v. Property & Casualty Insurance Company of Hartford, Case No.: 10-03925 Div. B 13th Judicial Circuit, Tampa Florida

AFO Imaging, Inc. v. Peak Property and Casualty Insurance Corp., et al., Case No.: 08-CA-21533 Div. C 13th Judicial Circuit, Tampa Florida

AFO Imaging, Inc. v. Nationwide Mutual Ins. Co., et al., Case No. 08-CA-021531-I Div. C 13th Judicial Circuit, Tampa Florida

Galura, et al. vs. Sonic Automotive, Inc. Case No.: 02-12274, Div. B, 13th Judicial Circuit, Tampa, Florida

Gilley v. Ernie Haire Ford, Inc., Case No. 02-8101 Div. I., 13th Judicial Circuit, Tampa, Florida

Veal v. Crown Auto Dealerships, Inc., Case No. 8:04-CV-0323-T-27MSS, United States District Court, M.D. Fla., Tampa Division

Pope v. Charter Warranty, L.L.C., Case No.: 06-000083, Div. A, 13th Judicial Circuit, Tampa, Florida

Mantzouris, et al. v. Scarritt Motor Group, Inc., Case No.: 03-CV0015-T-30, United States District Court, M.D. Fla., Tampa Division

Croxall, et al. v. Asbury Automotive, L.P., Case No.: 03-6201, Div. C, 13th Judicial Circuit, Tampa, Florida

Cotten, et al. v. Ferman Management Services Corporation, et al., Case No.: 02-08115, Div. A, 13th Judicial Circuit, Tampa, Florida

Mr. Rothburd has been approved as lead and co-lead class counsel in numerous other certified class actions and is attorney of record in other class actions now pending in both Federal and State Courts in addition to the cases above.

SIGNIFICANT PUBLISHED COMPLEX CASES

Kieffer v. Atheists of Florida, Inc. 269 So. 3d 656 (Fla. 2d DCA 2019)

U.S. Hospitality of Tampa Bay, Inc. v. Alite, 4 So. 3d 699 (Fla. 2d DCA 2009)

Santiago v. Sunset Cove Investments, Inc., 988 So. 2d 10 (Fla. 2d DCA 2008)

Sonic Automotive, Inc. v. Galura, et al., 961 So.2d 961(Fla. 2d DCA 2007), *rev denied* 977 So. 2d 577 (Fla. 2008).

Liberatore v. 21st Century Satellite Communs., Inc. (In re 21st Century Satellite Communs., Inc.), 278 B.R. 577 (MD FL BK 2002)

Ryan v. Stalley, 775 So. 2d 296 (Fla. 2d DCA 200)

Vaughan v. First Union Nat'l Bank, 740 So. 2d 1216 (Fla. 2d DCA 1999)

Levine v. Saavedra, 727 So. 2d 1110 (Fla. 2d DCA 1999)

Case Credit Corporation v. Furr, Trustee, 136 F.3d 1330 (11th Cir. 1998)

Wilson v. Calfee, 706 So. 2d 310 (Fla. 2d DCA 1997)

Mandalay Shores Cooperative Housing Association, members v. Mandalay Shores Cooperative Housing Association, Inc. 107 F.3d 23 (11th Cir. 1997)

Mr. Rothburd has been involved in numerous other published complex cases in both State and Federal courts, including appeals from the class certification decisions above, as well as many other unpublished decisions.

SPEAKING ENGAGEMENTS

RECOVERY, Assisting Consumers in the Aftermath of COVID-19, Accurate Credit Reporting under the CARES Act, Florida Bar Consumer Protection Committee, Annual Bar Meeting 2021

Arbitrating and Mediating the Statutory Damage Case National Association of Consumer Advocates Spring Training 2021

Certifying a Class Action: From Complaint to Order Florida Conference of Circuit Judges 2019

So You Have a Case with a Fee Claim; Now What? Statewide Consumer Law Training: The Legal Aid Society of the Orange County Bar Association, Inc.,

Jacksonville Area Legal Aid, The Legal Aid Society of Palm Beach County, Legal Aid Service of Broward County, Inc., The Florida Pro Bono Coordinator's Association, and Florida National Association of Consumer Advocates 2019

Foreclosure Defense (TILA, RESPA, Other) Legal Aid of Manasota Presents: SHOPP: Senior Home Ownership Preservation Project 2018

Doing Well While Doing Good: Public/Private Partnerships Florida Bar Consumer Protection Committee, Annual Bar Meeting 2018

Ethics of Settling Consumer Impact Cases Making a Big Impact in Consumer Protection: Analyzing Consumer Impact Cases, Florida Bar Consumer Protection Committee, Annual Bar Meeting 2015

Class Actions Making a Big Impact in Consumer Protection: Analyzing Consumer Impact Cases, Florida Bar Consumer Protection Committee, Annual Bar Meeting 2015

Attorney's Fees Including Ethical Issues Making a Big Impact in Consumer Protection: Analyzing Consumer Impact Cases, Florida Bar Consumer Protection Committee, Annual Bar Meeting 2015

Ascertainability After Carrera: Is it a Headache? National Consumer Law Center, Class Action Symposium 2014

Debt Collector Technologies: Tricks and Traps to Spot, Exploit and Avoid, National Consumer Law Center, FDCPA Experienced Litigators' Meeting 2014

Litigating Attorney's Fees, Florida Legal Services 2014

Importance of Copyright, Hillsborough Community College 2013

Protecting Your Work Product, Hillsborough Community College 2012

Ethically Litigating Attorney's Fees, Florida Legal Services Regional 2011

Practically Litigating Attorney's Fees, Florida Legal Services, Attorney's Fees Training 2010.

EXHIBIT

B

Client Fees Listing

ALL DATES

Date	Fee / Time	Working Lawyer	Hours	Amount	Inv#	Billing Status
Entry #	Explanation					
6868	Class Action - Kelly Stewart,Vivian Areva					
6868-001	Class Action - USAA Casualty Ins. Co. and					
Sep 18/2020	Lawyer: CER 1.00 Hrs X 0.00	CER - Craig E. Rothburd	1.00	0.00		Unbilled
46642	Review numerous e-mails from Attorneys Mandel, Normand, Shamis and Sanders regarding new lawsuit, acceptance of					
Oct 1/2020	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
46965	Review e-mail from Attorney Mandel regarding Appraisal Demand letters / Review letters (5)					
Oct 14/2020	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
47179	Review e-mail from Attorney Mandel regarding amendment for fees.					
Oct 28/2020	Lawyer: CER 0.40 Hrs X 0.00	CER - Craig E. Rothburd	0.40	0.00		Unbilled
47393	Review e-mail from Attorney Mandel regarding Amended Complaint / Review Amended Complaint / Review e-mail from					
Oct 28/2020	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
47410	Review Responses (3) from Attorney Mandel regarding Demands for Appraisal.					
Nov 3/2020	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
47594	Review e-mail from Attorney Sanders regarding Motion to Compel Appraisal.					
Nov 3/2020	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
47607	Review e-mail from Attorney Mandel regarding Motion to Compel Appraisal / Review Motion to Compel Appraisal.					
Nov 18/2020	Lawyer: CER 0.00 Hrs X 0.30	CER - Craig E. Rothburd	0.00	0.00		Unbilled
47973	Review e-mails from Attorneys Mandel and Jeeves regarding expert / Review CV of Expert Elliston / Reply e-mail					
Nov 18/2020	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
47974	Review Motion to Designate Case as Complex.					
Dec 2/2020	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
48139	Review e-mail from Attorney Mandel regarding status and setting hearing on Motion to Compel Appraisal.					
Dec 3/2020	Lawyer: CER 0.50 Hrs X 0.00	CER - Craig E. Rothburd	0.50	0.00		Unbilled
48159	Review e-mail from Attorney Mandel and draft Amended Petition.					
Dec 3/2020	Lawyer: CER 0.00 Hrs X 0.00	CER - Craig E. Rothburd	0.00	0.00		Unbilled
48166	Review e-mail from Attorney Jacobs regarding draft Motion and CMO					
Dec 4/2020	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
48201	Review e-mail from Attorney Mandel and final draft scheduling Motion and proposed Order.					
Dec 7/2020	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
48232	Review e-mails from Attorneys Phillips (2), Sheerwood (2) and Mandel (2) regarding status of hearing and draft					
Dec 7/2020	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
48239	Review e-mails from Attorneys Normand and Mandel regarding hearing on MTD / Review Order Granting Pro Hac for A					
Dec 7/2020	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
48241	Review e-mails from Attorneys Silverstein and Bielecky regarding counter-offers / E-mail to Attorney Bielecky /					
Dec 8/2020	Lawyer: CER 0.40 Hrs X 0.00	CER - Craig E. Rothburd	0.40	0.00		Unbilled
48256	Review e-mail from Attorney Phillips regarding draft Amended Petition / Review draft Petition					
Dec 14/2020	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
48398	Review e-mail and draft ESI Protocols from Attorney Mandel.					
Jan 14/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
48964	Review e-mail from Attorney Mandel regarding hearing on Motion to Compel Appraisal / Telephone with Attorneys M					
Jan 18/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
48988	Review e-mail from Attorney Mandel and Judge's notes regarding deny appraisal.					
Jan 22/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
49076	Review e-mail from Attorney Mandel and Order Denying Appraisal.					
Feb 22/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
49838	Review e-mail from Attorney Mandel regarding proposed Discovery Orders to Court / Review signed Orders.					
Mar 4/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
50201	Review e-mail from Attorney Normand's office regarding draft Discovery.					
Apr 5/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
50840	Review e-mails from Attorney Mandel and Phillips regarding draft Amended Complaint and Dealer Fee Claim.					
Apr 5/2021	Lawyer: CER 0.50 Hrs X 0.00	CER - Craig E. Rothburd	0.50	0.00		Unbilled
50855	Review Datto Response to RFA's and RFP's (2nd) / E-mail to Attorney Biondolino.					
Apr 5/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
50857	Review e-mail from Attorneys Phillips (2) and Mandel (2) regarding Amended Complaint and revisions.					
Apr 5/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
50859	Review e-mail from Attorney Biondolino regarding MTC Datto for better responses and documents / Reply e-mail to					
Apr 29/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
51399	Review e-mails from Attorneys Mandel, Normand and Shamis regarding Discovery to Plaintiff and Response.					
Jun 8/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
52239	Review e-mails from Attorneys Mandel and Grigorian regarding Discovery Responses and documents.					
Jun 14/2021	Lawyer: CER 0.80 Hrs X 0.00	CER - Craig E. Rothburd	0.80	0.00		Unbilled
52333	Review e-mails from Attorney Mandel (4) regarding Discovery Responses / Review Plaintiffs' Discovery Responses					
Jun 16/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
52425	Review e-mail from Attorneys Mandel (2), Phillips and Gregorian regarding Stewart Release.					
Jun 17/2021	Lawyer: CER 0.40 Hrs X 0.00	CER - Craig E. Rothburd	0.40	0.00		Unbilled
52441	Review e-mails from Attorney Mandel (5), Grigorian, Normand (4) and Shamis regarding Discovery and Stewart Rele					
Jul 20/2021	Lawyer: CER 0.40 Hrs X 0.00	CER - Craig E. Rothburd	0.40	0.00		Unbilled
53022	Review e-mails from Attorneys Mandel (6), Jeeves and Gold (2) regarding Discovery and Case scheduling / Review					
Jul 29/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
53186	Review e-mails from Attorneys Figueroa, Mandel and Sanders regarding revisions to Discovery Plan and Order / Re					
Aug 2/2021	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
53313	Review e-mails from Attorneys Mandel (2), Normand and Neff regarding new "release" language from USAA / Review					
Aug 23/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
53601	Review e-mails from Attorneys Mandel and Phillips regarding depositions / Review Notice of Depositions (3) rega					
Aug 23/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
53607	Review e-mails from Attorneys Normand and Mandel regarding Supplemental Document Production					
Aug 25/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
53634	Review e-mail from Attorney Norman regarding potential partial settlement.					
Sep 8/2021	Lawyer: CER 0.40 Hrs X 0.00	CER - Craig E. Rothburd	0.40	0.00		Unbilled
53963	Review e-mail from Attorney Neff regarding summary of USAA production / Review Summary and report of same.					
Sep 27/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
54198	Review e-mails from Attorneys Normand and Mandel regarding settling CRA					
Oct 11/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
54659	Review e-mails from Attorneys Normand (2), Mandel and Jeeves regarding status of Amended Complaint and dropping					
Oct 11/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
54663	Review Notice of Cancellation of Dimas Deposition and Notice of 30(b)6 Deposition.					

Client Fees Listing

ALL DATES

Date	Fee / Time	Working Lawyer	Hours	Amount	Inv#	Billing Status
Entry #	Explanation					
Oct 15/2021	Lawyer: CER 0.50 Hrs X 0.00	CER - Craig E. Rothburd	0.50	0.00		Unbilled
54721	Review e-mail from Attorney Normand's office regarding 2nd Amended Complaint / Review draft 2nd Amended Complaint					
Oct 19/2021	Lawyer: CER 0.40 Hrs X 0.00	CER - Craig E. Rothburd	0.40	0.00		Unbilled
54780	Review e-mails from Attorney Mandel and Neff regarding Class information and Class size / Review e-mail and rev.					
Oct 20/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
54811	Review e-mail from Attorney Normand regarding update on Corp Rep Deposition.					
Nov 3/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
55262	Review filed Second Amended Complaint and e-mail from Attorney Jeeves' office regarding same.					
Nov 5/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
55284	Review USAA's Notices (2) of Deposition of the Plaintiff's.					
Nov 16/2021	Lawyer: CER 0.40 Hrs X 0.00	CER - Craig E. Rothburd	0.40	0.00		Unbilled
55452	Review e-mails from Attorney Mandel, Neff (2) and Jeeves (2) regarding inspection costs and expert / Reply e-mail					
Nov 17/2021	Lawyer: CER 0.40 Hrs X 0.00	CER - Craig E. Rothburd	0.40	0.00		Unbilled
55464	Review e-mails and survey information from Attorney Neff (2) / Review e-mail from Attorney Mandel (2) regarding					
Nov 19/2021	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
55503	Review e-mails from Attorney Neff (2) regarding inspection fees and expert for same / Reply e-mail to Attorney J					
Nov 19/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
55506	Review Amended Notice of Deposition of Plaintiff Simon					
Nov 29/2021	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
55567	Review e-mail from Attorney Judkins regarding draft Corp. Rep. Deposition Notice / Review Notice					
Dec 1/2021	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
55869	Review e-mail from Court regarding rescheduled hearing / Review e-mail from Attorney Mandel with final revised					
Dec 3/2021	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
55889	Review e-mails from Attorney Mandel (2) and Attorney Judkins (2) regarding USAA payment recap documents and Corp					
Dec 7/2021	Lawyer: CER 0.40 Hrs X 0.00	CER - Craig E. Rothburd	0.40	0.00		Unbilled
55929	Review e-mail from Attorneys Neff regarding inspection fee data / Review e-mails from Attorney Mandel (2) regard					
Jan 14/2022	Lawyer: CER 0.40 Hrs X 0.00	CER - Craig E. Rothburd	0.40	0.00		Unbilled
56751	Telephone with Attorney Jeeves regarding Class definition / Review e-mails from Attorney Jeeves and Neff regard					
Jan 18/2022	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
56779	Review e-mails from Attorneys Mandel (2), Jeeves (3) and Neff regarding Amending Claims and Class definition /					
Jan 21/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
56838	Review e-mail and Order allowing Amendment to Complaint and schedule from Judge Haas.					
Jan 24/2022	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
56840	Review e-mails from Attorney Neff (3) regarding Discovery update / Review e-mails from Attorney Mandel (3) regard					
Jan 27/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
56927	Review e-mails from Attorneys Mandel (2) and Judkins (2) regarding Depositions, Discovery and scheduling.					
Jan 27/2022	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
56928	Review e-mail from Attorney Neff regarding new Production and Summary of same / Review Summary					
Jan 28/2022	Lawyer: CER 0.80 Hrs X 0.00	CER - Craig E. Rothburd	0.80	0.00		Unbilled
56946	Attend Strategy Conference with Attorneys Jeeves and Mandel regarding Class Certification and Claims.					
Jan 28/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
56955	Review e-mails from Attorneys Neff (2) and Mandel (2) regarding new Discovery, percentages for payment of taxes					
Feb 1/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
57531	Review e-mails from Attorneys Jeeves, Mandel and Thatcher regarding taxable expert costs.					
Feb 1/2022	Lawyer: DJT 0.60 Hrs X 0.00	DJT - Dylan Thatcher	0.60	0.00		Unbilled
57979	Research regarding whether Expert Fees are taxable Court costs in Texas					
Feb 8/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
57689	Review e-mails from Attorneys Jeeves and Woodford regarding expert invoices / Reply e-mail to Co-Counsel.					
Feb 21/2022	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
57931	Review e-mail from Attorney Mandel with Expert Ericson information and sample report / Review report.					
Feb 21/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
57932	Review e-mails from Attorneys Mandel, Normand and Jeeves regarding class definition and company policy informat					
Mar 10/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
58571	Review e-mails (3) from Attorney Mandel and (2) from Attorney Judkins regarding Expert Disclosures and filing s					
Mar 11/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
58581	Review e-mail from Attorney Normand regarding expert and report for Texas inspection fees.					
Mar 11/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
58592	Review e-mail from Attorney Mandel regarding expert disclosure and amount for Texas inspection fees.					
Mar 20/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
58673	Review e-mail from Attorney Mandel regarding update and discussion with opposing Counsel regarding advancing Ca					
Mar 22/2022	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
58757	Review e-mail from Attorney Mandel regarding Expert Discovery Agreement / Review e-mails from Attorneys Mandel					
Mar 24/2022	Lawyer: CER 0.40 Hrs X 0.00	CER - Craig E. Rothburd	0.40	0.00		Unbilled
58796	Attend Strategy Conference with Attorneys Jeeves and Mandel.					
Mar 24/2022	Lawyer: DJT 2.20 Hrs X 0.00	DJT - Dylan Thatcher	2.20	0.00		Unbilled
59034	Highlighting and Summarizing Plaintiff and Defendant Depos for Attorney Mandel					
Mar 29/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
58882	Review e-mail from Attorney Mandel regarding: changes in Amended Complaint and Mediator selection					
Mar 31/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
58917	Review e-mail from Attorney Mandel regarding: status and new schedule for Briefing					
Apr 4/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
59363	Review e-mails from Attorney's Mandel (2) and Phillips (2) regarding: Lease v Purchase cars and Experts for Ce					
Apr 5/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
59378	Review e-mail and Amended Level 3 Order regarding: case deadlines from Attorney Mandel					
Apr 6/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
59400	Review e-mail from Attorney Mandel regarding: selection of Mediator Max and scheduling same / Reply e-mail to A					
Apr 11/2022	Lawyer: CER 0.50 Hrs X 0.00	CER - Craig E. Rothburd	0.50	0.00		Unbilled
59448	Review e-mail and draft Motion for Class Cert from Attorney Mandel					
Apr 20/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
59650	Review e-mail from Attorney Porter's office regarding: payment of Interpled Funds / Reply e-mail to Attorney Po					
Apr 21/2022	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
59670	Review e-mails from Attorney's Mandel (2), Jeeves's office (2), Attorney Jeeves (2), and Attorney Normand (2)					
Apr 21/2022	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
59676	Telephone with Attorney Jeeves regarding: Mediation and attendance at same					
Apr 22/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
59722	Review Court Order Sealing Records (transcript of Neilsen and Penn depositions)					

Client Fees Listing

ALL DATES

Date	Fee / Time	Working Lawyer	Hours	Amount	Inv#	Billing Status
Entry #	Explanation					
Apr 25/2022	Lawyer: CER 0.40 Hrs X 0.00	CER - Craig E. Rothburd	0.40	0.00		Unbilled
59751	Review e-mails from Attorney's Mandel (5), Phillips (3) and Normand (5) regarding: Class Cert, Claims and Exper					
Apr 25/2022	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
59758	Review e-mail from Attorney Normand's office regarding: Expert Report of Karl Schwabauer / Review report					
Apr 25/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
59766	Review Court Order regarding: Sealing Records for Class Cert					
Apr 26/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
59934	Review e-mail from Attorney Phillips regarding: Expert Stockton Report and edits / Review report and edits / Rej					
Apr 26/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
59935	Review e-mail from Attorney Mandel regarding: Expert Stockton Report and Median versus Average Dealer Fees					
Apr 26/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
59936	Review e-mail from Attorney Neff regarding: Dealer Fee Claim and Class Definition / Review e-mail from Attorney					
Apr 29/2022	Lawyer: CER 0.50 Hrs X 0.00	CER - Craig E. Rothburd	0.50	0.00		Unbilled
59890	Review e-mails from Attorneys Phillips and Mandel regarding: draft Amended Complaint / Review draft / Reply e-m					
Apr 29/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
59892	Review e-mail from Attorney Phillips regarding: Pro Hac / Reply e-mail to Attorney Phillips					
May 3/2022	Lawyer: CER 0.70 Hrs X 0.00	CER - Craig E. Rothburd	0.70	0.00		Unbilled
60227	Review e-mails from Attorney's Mandel and Neff regarding: Unredacted Motion for Class Cert and Exert Documents					
May 3/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
60229	Review e-mails from Attorney's Phillips (2) and Mandel (2) regarding: filing issues with Motion for Class Cert					
May 23/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
60675	Review Deposition Notice of Expert Kuntz / Review e-mails from Attorney's Mandel (2) and Normand (2) regarding:					
May 24/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
60687	Review Plaintiff's Objection to Kuntz Depo Notice					
May 25/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
60711	Review e-mails from Attorney's Mandel and Normand regarding: Expert Depositions / Review Notice of Deposition o					
Jun 9/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
61095	Review e-mails (2) from Attorney Mandel regarding expert Martin deposition, notice and objections to same / rev.					
Jun 13/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
61142	Review Objections to deposition topics of Expert Martin					
Jun 16/2022	Lawyer: CER 0.00 Hrs X 0.20	CER - Craig E. Rothburd	0.00	0.00		Unbilled
61250	Review e-mails from Attorneys Figueroa and Mandel regarding supplemental production for experts / review e-mail					
Aug 10/2022	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
62787	Review e-mails from Attorneys Neff, Mandel and Jeeves regarding expert witness for dealer fees / reply e-mail to					
Aug 10/2022	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
62794	Review e-mails from Attorneys Jeeves and Mandel (2) regarding rebuttal and Texas expert / reply e-mail to co-co					
Aug 10/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
62797	Review e-mail from Attorney Jeeves regarding Tomblin report and expert review					
Aug 10/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
62802	Telephone with Attorney Jeeves regarding rebuttal affidavit and arguments in rebuttal					
Aug 11/2022	Lawyer: CER 1.00 Hrs X 0.00	CER - Craig E. Rothburd	1.00	0.00		Unbilled
62826	Attend strategy conference with Attorneys Jeeves, Mandel and regarding expert reports and rebutting same					
Aug 16/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
62925	Review e-mails from Attorneys Sanders and Jeeves regarding expert Tomlin deposition					
Aug 16/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
62937	Review e-mails from Attorneys Mandel and Jeeves regarding expert deposition of Tomlin / reply e-mail to Attorne					
Aug 22/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
63106	Review e-mails from Attorneys Mandel and Phillips regarding drafting reply brief					
Sep 7/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
63725	Review emails from Attorney Neff regarding deposition summary of expert Tomlin deposition					
Sep 22/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
64036	Review email from Attorney Mandel regarding information for mediation					
Sep 30/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
64177	Review emails (2) from Attorney Mandel regarding data for damage calculations and mediation					
Oct 21/2022	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
64729	Review emails from Attorneys Mandel and Normand regarding spreadsheet analysis					
Oct 24/2022	Lawyer: CER 0.40 Hrs X 0.00	CER - Craig E. Rothburd	0.40	0.00		Unbilled
64774	Review emails from Attorneys Mandel, Neff, Normand (2) and Jeeves (2) regarding potential additional claim / rej					
Oct 26/2022	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
64844	Review emails from Attorneys Mandel (2) and Phillips regarding damage calculations for mediation					
Oct 26/2022	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
64847	Review email from Attorney Mandel regarding lodestar for mediation / prepare time, fee and costs reports and ca					
Nov 4/2022	Lawyer: CER 0.40 Hrs X 0.00	CER - Craig E. Rothburd	0.40	0.00		Unbilled
65206	Telephone with Attorney Jeeves regarding mediation / review continued mediation confirmation letter from Mediat					
Nov 17/2022	Lawyer: CER 0.50 Hrs X 0.00	CER - Craig E. Rothburd	0.50	0.00		Unbilled
65532	Attend strategy meeting with Attorneys Mandel, Jeeves and Woodford					
Jan 3/2023	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
66919	Review email from Attorney Mandel regarding USAA settlement					
Jan 26/2023	Lawyer: CER 0.50 Hrs X 0.00	CER - Craig E. Rothburd	0.50	0.00		Unbilled
67540	Review email from Attorney Mandel regarding case settled / review term sheet / reply email to Attorney Mandel r					
Jan 30/2023	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
67571	Review email from Attorney Mandel regarding status and hearing set with Court					
Feb 13/2023	Lawyer: CER 0.60 Hrs X 0.00	CER - Craig E. Rothburd	0.60	0.00		Unbilled
68013	Review emails from Attorneys Mandel (4) and Phillips (4) regarding draft preliminary approval motion, order and					
Feb 13/2023	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
68055	Review emails from Attorney Mandel (2) and Phillips regarding timing for hearing and filing preliminary motion					
Feb 21/2023	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
68225	Review emails from Attorneys Mandel and Phillips regarding status of settlement documents					
Feb 21/2023	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
68231	Review emails from Attorneys Mandel, Phillips and Sanders regarding finalizing settlement drafts					
Mar 1/2023	Lawyer: CER 0.30 Hrs X 0.00	CER - Craig E. Rothburd	0.30	0.00		Unbilled
68498	Review emails and edits to short and long form notices from Attorney Mandel (2) /					
Mar 8/2023	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
68839	Review email from Attorney Mandel regarding settlement status					
Mar 20/2023	Lawyer: CER 0.50 Hrs X 0.00	CER - Craig E. Rothburd	0.50	0.00		Unbilled
68993	Review emails from Attorneys Mandel and Edelsberg regarding revised draft settlement / review draft settlement					

Client Fees Listing

ALL DATES

Date	Fee / Time	Working Lawyer	Hours	Amount	Inv#	Billing Status
Entry #	Explanation					
Mar 20/2023	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
68995	Review emails from Attorneys Mandel and Edelsberg regarding class notice and revisions to same /					
Mar 22/2023	Lawyer: CER 0.80 Hrs X 0.00	CER - Craig E. Rothburd	0.80	0.00		Unbilled
69113	Review email from Attorney Mandel regarding final draft motion for preliminary approval, settlement agreement a					
Mar 30/2023	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
69312	Review email and final draft postcard notice form from Attorney Mosqueda					
Mar 30/2023	Lawyer: CER 0.20 Hrs X 0.00	CER - Craig E. Rothburd	0.20	0.00		Unbilled
69320	Review email from Attorney Edlesberg regarding draft claim forms / review forms (2)					

Unbilled: 39.80 0.00
 Billed: 0.00 0.00
 Total: 39.80 0.00
 Percent Billed: 0.00 100.00

*** Summary by Working Lawyer ***

Working Lawyer	Hours						Fees					
	Unbilled	Firm %	Billed	Firm %	Total	% Bld	Unbilled	Firm %	Billed	Firm %	Total	% Bld
CER - Craig E. Rc	37.00	92.96	0.00	100.00	37.00	0.00	0.00	100.00	0.00	100.00	0.00	100.00
DJT - Dylan Thatc	2.80	7.04	0.00	100.00	2.80	0.00	0.00	100.00	0.00	100.00	0.00	100.00
Firm Total	39.80	100.00	0.00	100.00	39.80	0.00	0.00	100.00	0.00	100.00	0.00	100.00

*** Summary by Responsible Lawyer ***

Responsible Lawyer	Hours						Fees					
	Unbilled	Firm %	Billed	Firm %	Total	% Bld	Unbilled	Firm %	Billed	Firm %	Total	% Bld
CER - Craig E. Rc	39.80	100.00	0.00	100.00	39.80	0.00	0.00	100.00	0.00	100.00	0.00	100.00
Firm Total	39.80	100.00	0.00	100.00	39.80	0.00	0.00	100.00	0.00	100.00	0.00	100.00

REPORT SELECTIONS - Client Fees Listing

Layout Template Default
 Advanced Search Filter None
 Requested by Craig
 Finished Monday, July 31, 2023 at 05:53:26 PM
 Ver 2021 R1 (14.5.20211115)
 Date Range ALL DATES
 Matters 6868-001
 Clients All
 Major Clients All
 Client Intro Lawyer All
 Matter Intro Lawyer All
 Responsible Lawyer All
 Assigned Lawyer All
 Type of Law All
 Select From Active, Inactive, Archived Matters
 Matters Sort by Default
 New Page for Each Lawyer No
 Firm Totals Only No
 Client balances only No
 Matter balances only No
 Entries Shown - Billed Only Yes
 Entries Shown - Unbilled Yes
 Entries Shown - Billable Tasks Yes
 Entries Shown - Write Up/Down Tasks Yes
 Entries Shown - No Charge Tasks Yes
 Entries Shown - Non Billable Tasks Yes
 Working Lawyer All

INVOICE

Invoice #: 1399

Date: 07-31-2023

Due On: 08-30-2023

Class Action - Kelly Stewart, Vivian Arevalo and Micah Simon

Matter Number: 6868-001-Class Action - Kelly Stewart, Vivian Arevalo and Micah Simon - Class Action - USAA Casualty Ins. Co. and Garrison Prop. & Casualty Ins. Co.

Matter Name: Class Action - USAA Casualty Ins. Co. and Garrison Prop. & Casualty Ins. Co.

Services

Date	Atty	Description	Quantity	Rate	Total
04-03-23	CER	Review emails from Attorneys Shamis and Mandel regarding URL for class administration	0.20	950.00	\$0.00
04-13-23	CER	Review email from Attorney Mandel regarding Arevalo v. USAA: Motion and Motion and Order for Preliminary Approval / review draft motion and draft order	0.50	950.00	\$0.00
04-14-23	CER	Review email from Attorney Mandel regarding draft declaration in support of certification / review draft declaration	0.30	950.00	\$0.00
04-17-23	CER	Review email from Judicial Assistant Ramirez regarding cancellation of hearing	0.10	950.00	\$0.00
04-17-23	CER	Review emails from Attorneys Normand, Mandel and Jeeves regarding draft declaration	0.20	950.00	\$0.00
04-17-23	CER	Review email from Attorney Mosqueda regarding draft Preliminary Approval Motion and Order	0.10	950.00	\$0.00
04-18-23	CER	Review email from Attorney Mandel Motion and Order for Preliminary Approval / review final drafts	0.40	950.00	\$0.00
04-18-23	CER	Review email from Attorney Mosqueda regarding additional revision to final drafts	0.10	950.00	\$0.00
04-18-23	CER	Review email from Attorney Mosqueda regarding declaration in support of certification	0.10	950.00	\$0.00

04-25-23	CER	Review email from Attorney Mandel regarding submission of preliminary approval order and scheduling final fairness hearing	0.10	950.00	\$0.00
04-27-23	CER	Review email from Attorney Mandel regarding status of preliminary approval	0.10	950.00	\$0.00
05-09-23	CER	Review email from Attorney Mandel regarding status of entry of preliminary approval order	0.10	950.00	\$0.00
05-23-23	CER	Review email from Attorney Mandel regarding proposed preliminary approval order	0.10	950.00	\$0.00
06-04-23	CER	Review email from court and filed preliminary approval order	0.30	950.00	\$0.00
06-07-23	CER	Review email from Attorney Mandel regarding Agreed Order Preliminarily Approving Settlement and Directing Notice to the Class	0.10	950.00	\$0.00
06-09-23	CER	Review email from class administrator regarding Proposed Timeline / review timeline	0.20	950.00	\$0.00
06-29-23	CER	Review emails from Epiq regarding USAA/Arevalo - Calendar dates and web url (3) / review emails from counsel regarding same (3)	0.20	950.00	\$0.00
06-29-23	CER	Review email from Attorney Mandel regarding drafting fee petition	0.10	950.00	\$0.00
06-29-23	CER	Review email from Attorney Normand regarding fee petition	0.10	950.00	\$0.00
06-30-23	CER	Review emails from class admin (9) regarding dates and deadlines for administration of class	0.20	950.00	\$0.00
06-30-23	CER	Review email from Epiq regarding Arevalo v USAA - Calendar Reminders	0.10	950.00	\$0.00
07-18-23	CER	Review email from Attorney Mandel regarding online claim	0.10	950.00	\$0.00
07-18-23	CER	Review email from Attorney Sanders regarding online claim	0.10	950.00	\$0.00
07-18-23	CER	Review email from Attorney Shamis regarding online claim	0.10	950.00	\$0.00

07-18-23	CER	Review email from Attorney Shamis confirm need for online claim form	0.10	950.00	\$0.00
07-18-23	CER	Review email from Attorney Mandel regarding settlement terms and online claim anticipated in settlement	0.10	950.00	\$0.00
07-18-23	CER	Review email from Attorney Sanders regarding agreement to online claim form	0.10	950.00	\$0.00
07-18-23	CER	Review email from Epiq regarding online claims	0.10	950.00	\$0.00
07-18-23	CER	Review email from Epiq Case Components for Review for administration / review proposed claim forms and scripts	0.80	950.00	\$0.00
07-18-23	CER	Review email from Attorney Normand regarding Case Components for Review	0.10	950.00	\$0.00
07-19-23	CER	Review email from Epiq regarding email campaign and class administration	0.10	950.00	\$0.00
07-19-23	CER	Review email from Attorney Mandel regarding Case Components for Review and edits to same / review Attorney Mandel edits	0.30	950.00	\$0.00
07-19-23	CER	Review email from Epiq regarding Case Components for Review revisions and questions	0.10	950.00	\$0.00
07-19-23	CER	Review email from Attorney Mandel regarding answers to Epiq's questions	0.10	950.00	\$0.00
07-19-23	CER	Review email from Attorney Sanders revisions to Case Components for notice and administration / review revisions	0.30	950.00	\$0.00
07-19-23	CER	Review email from Attorney Mosqueda regarding class data production	0.20	950.00	\$0.00
07-19-23	CER	Review email from Attorney Phillips regarding Paris/South - Damages Calculations	0.10	950.00	\$0.00
07-20-23	CER	Review email from Attorney Mosqueda regarding USAA class data	0.10	950.00	\$0.00
07-20-23	CER	Review email from Attorney Normand regarding class documents	0.10	950.00	\$0.00

07-20-23	CER	Review email from Epiq regarding confirmation of class data	0.10	950.00	\$0.00
07-20-23	CER	Review email from Attorney Mandel regarding class data and damage calculations	0.10	950.00	\$0.00
07-20-23	CER	Review email from Attorney Normand regarding claim information for submission	0.10	950.00	\$0.00
07-20-23	CER	Review email from Attorney Mandel regarding claim form and revisions / review claim form and revisions	0.20	950.00	\$0.00
07-20-23	CER	Review email from Attorney Mosqueda regarding claim form and claim data / review edits from Attorney Mosqueda to same	0.20	950.00	\$0.00
07-26-23	CER	Review emails from Attorneys Mandel (2) and Normand regarding application for fees and costs / reply email to Attorney Mandel / calculate time and costs	0.40	950.00	\$0.00
07-26-23	CER	Review email from Attorney Mandel regarding declarations for case / reply email to Attorney Mandel	0.20	950.00	\$0.00
07-27-23	CER	Review email from Attorney Mandel regarding web-site revisions and edits / review edits	0.20	950.00	\$0.00
07-27-23	CER	Review email from Attorney Mosqueda regarding revisions to web-site	0.10	950.00	\$0.00
07-27-23	CER	Review email from Attorney Mandel regarding revisions to FAQ's	0.10	950.00	\$0.00
07-27-23	CER	Review email from Attorney Mandel regarding need for timekeeping records	0.20	950.00	\$0.00
07-27-23	CER	Review El Apple I case / reply email to Attorney Mandel	0.30	950.00	\$0.00
07-27-23	CER	Review email from Attorney Mosqueda regarding further revision to FAQ's	0.10	950.00	\$0.00
07-27-23	CER	Review email from Attorney Normand regarding Fee Application	0.10	950.00	\$0.00
07-27-23	CER	Review email from Epiq regarding language in postcard / review proposed language	0.20	950.00	\$0.00

07-28-23	CER	Review email from Attorney Mosqueda regarding revisions to FAQ's / review additional comments/revisions	0.20	950.00	\$0.00
07-28-23	CER	Review email from Attorney Mandel regarding Texas procedure for fee application	0.10	950.00	\$0.00
07-28-23	CER	Review email from Attorney Mandel regarding additional reviews to FAQ's	0.10	950.00	\$0.00
07-28-23	CER	Review email from Attorney Mosqueda regarding additional revisions and final versions of language for notice	0.20	950.00	\$0.00
07-28-23	CER	Review email from Attorney Mandel regarding Fee Application and Texas law memo / review memo	0.40	950.00	\$0.00
07-28-23	CER	Review emails from Attorney Normand regarding Fee Application	0.10	950.00	\$0.00
07-31-23	CER	Review emails (two) from Epiq regarding updated post-cards / review updated postcards	0.20	950.00	\$0.00
07-31-23	CER	Review email from Attorney Mosqueda regarding missing revisions to postcard	0.10	950.00	\$0.00
07-31-23	CER	Review email from Attorney Mandel regarding postcard revisions and claims form	0.10	950.00	\$0.00
07-31-23	CER	Review email from Epiq regarding corrected post-cards / review postcards	0.20	950.00	\$0.00
07-31-23	CER	Review email from Attorney Mosqueda regarding approval of revised post-cards	0.10	950.00	\$0.00

Services Subtotal: \$0.00

Subtotal	\$0.00
Total	\$0.00
Payment	\$0.00
Balance Owing	\$0.00

Statement Account Summary

Previous Balance		New Charges		Payments Received		Total Amount Outstanding
\$0.00	+	\$0.00	-	\$0.00	=	\$0.00

Pre-bill Summary

*****Please note, this is a preview. These funds have not been applied.*****

Total Amount Outstanding	Available Funds	Amount Outstanding After Application	Funds Available After Application
\$0.00	\$0.00	\$0.00	\$0.00

As you can see from your invoice, we transferred to a new practice management platform. We now have easier options for payment and for you to receive email bills. Our online payment link allows you to pay with credit or debit cards as well as an ACH payment option directly linked to your account. In order to take advantage of this, please confirm your email address for who your invoice should be sent to and any additional email address(es) if someone else needs to receive the invoices. We will implement email billing over the next few billing cycles, but you can do so now if you contact our office to let us know you would like email invoices and to confirm the email address(es) where those invoices should be sent.

Sincerely,
Craig Rothburd

Please make all amounts payable to:

Craig E Rothburd P.A., 320 W. Kennedy Blvd., Suite #700 Tampa, Florida 33606

EXHIBIT 3

CAUSE NO. 2020-CI-16240

**VIVIAN AREVALO, and MICAH
SIMON, individually and on behalf of
all others similarly situated,**

Plaintiffs,

v.

**USAA CASUALTY INSURANCE
COMPANY, and GARRISON
PROPERTY & CASUALTY
INSURANCE COMPANY,**

Defendants.

§ **IN THE DISTRICT COURT**
§
§
§
§ **OF BEXAR COUNTY, TEXAS**
§
§
§
§ **285th JUDICIAL DISTRICT**
§
§
§

**DECLARATION OF CASIM ADAM NEFF IN SUPPORT OF CLASS COUNSEL'S
MOTION FOR APPROVAL OF ATTORNEYS' FEE AWARD
AND REIMBURSEMENT OF COSTS**

I, Casim Adam Neff, declare as follows:

1. I am the manager and member owner in the solo law firm of Neff Insurance Law, PLLC, and co-counsel of record for the Plaintiffs in the above action, which was filed as a class action.
2. I have responsibility for this litigation and have personal knowledge as to all matters set forth in this Affidavit.
3. I graduated with honors from Stetson School of Law College of Law in May 2011. I am a member in good standing of the Florida Bar and have been since November of 2011, and have not had any adverse discipline history with the Florida Bar, or any of the federal district courts of which I am a member, at any point during my career as an attorney.
4. I have over eleven years (11) of litigation practice experience with a focus on contingent fee first-party insurance claims litigation, specifically contractual disputes between

insureds and their insurance carriers as in this case. My practice includes both contingent individual claimant litigation, and class action litigation, focused on first-party insurance and contractual issues. This case was also taken on a contingent basis with my fees to be determined by the Court, based on my experience as a licensed attorney, and my experience in first-party insurance and class action litigation in both state and federal courts. A copy of my most current resume is attached as **Exhibit A** outlining my experience in greater detail. My role in this litigation was as associate co-counsel and primarily involved responsibilities for the research, discovery management, data management and validation, and planning and strategy, in the pre-settlement phases in the above styled case. Through the completion of this case, I project that I will be responsible for, and engage in, additional work regarding data management and validation, and management and resolution of class member claims.

5. I have been approved as class counsel in several cases some of which are identified on the attached **Exhibit A**.

6. The information contained in my firm's time records were made contemporaneously by the timekeeper who entered the time and were kept in my firm's ordinary course of business. Attached hereto as **Exhibit B** are Neff Insurance Law PLLC's contemporaneous time records.

7. I am familiar with the fees and costs customarily charged by attorneys and allowed by courts for attorney fees and costs in similar cases both in Florida, and in class actions litigating around the United States. I researched the reasonable value of the services provided in class action litigation, and I have applied that research to this declaration and my opinions herein.

8. In formulating my opinions herein, I also considered, among other things, the factors set forth in Texas Disciplinary Rules of Professional Conduct, Rule 1.04.

9. I also reviewed applicable case law, including but not limited to *Norman v. Housing Authority of City of Montgomery*, 836 F.2d 1292 (11th Cir. 1989), *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983), and *El Apple I, Ltd. v. Olivas*, 370 S.W.3d 757 (Tex. 2012)

10. In reviewing the contemporaneous billing records kept by myself for this matter, and when exercising reasonable billing judgment, I am of the opinion and belief that the hours billed by my firm are reasonable. See *Norman v. Housing Authority of City of Montgomery*, 836 F.2d 1292 (11th Cir. 1989); see also *Florida Drilling & Sawing v. Fohrman*, 635 So.2d 1054, 1055-56 (Fla. 4th DCA 1994). This is especially so as each of the firms retained by the Plaintiff performed in clearly defined roles with minimal duplication of time. Plaintiffs' counsel adopted a strict organizational plan to advance and resolve the claims in a time-efficient manner.

11. To account for any potential duplication of effort and in the furtherance of the exercise of billing judgment, I applied a reduction of 10% of the total time billed by Neff Insurance Law PLLC in this matter, see paragraph 13 below for the exact amount of the reduction.

12. Based on my over eleven (11) years of experience and consistent with the fees charged in similar class action work, my firm's billing rates in this matter are **\$450** per hour for the substantive legal work which furthered the case.

13. Based on the foregoing rate, my firm's lodestar after the exercise of billing judgment as of August 7, 2023, is **\$45,900**, based on the time from the chart below multiplied by the applicable rates. In my opinion, the following amounts of time for the services performed by myself, Casim Adam Neff, through August 7, 2023, and projected to be performed through the end of this case are reasonable:

Timekeeper	Actual Time	Projected Time	Total Time
Casim Adam Neff, Esquire	103.3	10	113.3
Post-Billing Judgment Reduction with Total Time at 90% (101.97 hours rounded to the nearest tenth of an hour)			102

14. Based on the foregoing rates and using the time from the above chart, my firm's lodestar after the exercise of billing judgment (reduced time by **11.3** hours) as of August 7, 2023, is **\$45,900 (102 hours x \$450/hour)**. In my opinion, the foregoing amounts of time for the services provided by Neff Insurance Law, PLLC, through August 7, 2023, and projected to be performed through the end of this case are usual, customary, and reasonable.

My name is Casim Adam Neff, my firm's physical address is 4051 27th Avenue North, St. Petersburg, Florida, 33713, United States of America. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Hillsborough County, State of Florida, on the 8th day of August, 2023.

/s/ Casim Adam Neff
Casim Adam Neff

EXHIBIT

A

Casim A. Neff, Esquire – Attorney at Law

P.O. Box 15063 • St. Petersburg, Florida 33733 • (727) 342-0617 • cneff@neffinsurancelaw.com

PROFESSIONAL EXPERIENCE

Neff Insurance Law, PLLC

Tampa, Florida

Managing Attorney, Plaintiff's Insurance Law

June 2016 – Current

- Primary focus on litigating Plaintiff's insurance-related disputes both large and small. Matters handled included class action, appellate, and trial level litigation. Representative certified class actions include:
 - *William South v. Progressive Select Insurance Company*, 19-CV-21760, United States District Court, Southern District of Florida
 - *Gonzallo Ubillus v. Progressive Marathon Insurance Company*, 2019-741-CK, Circuit Court for the County of Washtenaw, Michigan
 - *Douglas Bauer v. St. Joseph's Hospital, Inc.*, 19-CA-010837, 13th Judicial Circuit, Hillsborough County, Florida
 - *Kelly Pontillo v. Florida Health Sciences Center, Inc.*, 22-CA-000099, 13th Judicial Circuit, Hillsborough County, Florida

Direct General Insurance Company

Tampa, Florida

Claims Attorney, In-House Counsel

April 2014 – June 2016

- Managed Florida-wide litigation and strategy for a large non-standard automobile insurer on a variety of insurance first and third-party insurance disputes, including: PIP; Medical Payments; Collision and Comprehensive, Property Damage and Bodily Injury Liability; coverage and misrepresentation denial; and bad faith claims. Matters handled included class action, appellate, and trial level litigation.

Law Office of Ellen H. Ehrenpreis

Tampa, Florida

Attorney, GEICO General Insurance Company

March 2012 – March 2014

- Handled all aspects of the trial level litigation for the defense of 100's of first-party insurance disputes in the 5th, 6th, 10th, 11th and, 13th Judicial Circuits (West Central Florida) for this national carrier and its affiliates.

EDUCATION

Stetson University College of Law

Gulfport, Florida May 2011

Juris Doctor and Masters in Business Administration

- Graduated *cum laude*

University of Florida

Gainesville, Florida June 2000

BAR MEMBERSHIPS AND PROFESSIONAL ASSOCIATIONS

All State Courts of Florida

Southern District of Florida

Florida Justice Association

Middle District of Florida

Tampa Bay Trial Lawyers Association

EXHIBIT

B

Matter	Arevalo, Simon vs. USAA Casualty Insurance Company, et al
Matter Case No.	2020-CI-16240, Bexar County, Texas

Hours Worked	103.3
Hourly Charge for Casim Adam Neff (CAN)	\$450.00

Date	Billor	Hours Worked (0.6 increments)	Substance of Work
7/14/2020	CAN	0.4	Initial file setup, and review of client claims and conflict check
7/15/2020	CAN	0.2	Review finalized representation agreements
12/14/2020	CAN	0.2	Read review email from attorney Mandel re: proposed ESI order
6/13/2021	CAN	0.3	Ingest and ESI compliance review of Defendants 001 production
6/13/2021	CAN	0.1	Read/review email from attorney Mandel re: Plaintiff production preparation needs
6/14/2021	CAN	0.1	Read/review email from attorney Mandel re: Plaintiff production preparation needs, additional 1
6/16/2021	CAN	0.1	Read/review email from attorney Mandel re: Plaintiff production preparation needs, additional 2
6/16/2021	CAN	0.1	Read/review email from attorney Mandel re: Plaintiff production preparation needs, additional 3
6/21/2021	CAN	0.4	Telephone call with attorney Mandel re: Plaintiff production preparation needs
6/21/2021	CAN	0.2	Additional review of Defendants 01 re: missing load files, compliance
6/21/2021	CAN	0.1	Draft Email to Plaintiffs team re: missing load files on Defendants 01
6/21/2021	CAN	0.3	Draft and review of outbound Plaintiff Arevalo Production
6/21/2021	CAN	0.3	Draft and review of outbound Plaintiff Simon Production
6/21/2021	CAN	0.3	Draft and review of outbound Plaintiff Stewart Production
7/7/2021	CAN	0.1	Read/review email from attorney Mandel re: followup on Defendant production issues
7/8/2021	CAN	0.8	Ingest and ESI compliance review of Defendants 001 production
7/8/2021	CAN	1.1	Ingest and ESI compliance review of Defendants 002 production
7/8/2021	CAN	0.3	Telephone call with attorney Mandel re: coordination on document review, Defendant production issues
7/9/2021	CAN	0.7	Strategy/coordination call with Plaintiff team re: discovery

7/9/2021	CAN	0.2	Telephone call with attorney Mandel re: ingest status, preliminary review of production
7/11/2021	CAN	2	Coordination and mangement of DISCO document review for team, permissions
7/21/2021	CAN	0.2	Telephone call with attorney Mandel re: document ingestion and review status
7/29/2021	CAN	0.5	Ingest and ESI compliance review of Defendants 003 production
7/29/2021	CAN	0.5	Ingest and ESI compliance review of Defendants 004 production
8/2/2021	CAN	0.2	Research and review, and draft of opinion email to Plaintiff team re: vehicle value acceptance language, effect on ACV and fee claims
8/4/2021	CAN	2	Dcoument review of Defendants production to date
8/5/2021	CAN	3	Dcoument review of Defendants production to date, continued
8/5/2021	CAN	2	Draft email to team re: findings on initial document review of Defendants production
8/5/2021	CAN	0.2	Research and review, re: Fuller case
8/5/2021	CAN	0.1	Draft email to Attorney Mandel re: Fuller case findings
8/23/2021	CAN	0.2	Telephone call with attorney Mandel re: supplemental production needs
8/27/2021	CAN	0.4	Prepare, complie and review, new discovery for service
8/27/2021	CAN	0.3	Prep outbound Simon Production, and review for ESI compliance
8/27/2021	CAN	0.2	Prep outbound Stewart Production, and review for ESI compliance
8/27/2021	CAN	0.1	Draft email to Plaintiff team re: status/description of supplemental production
8/27/2021	CAN	0.1	Prep outbound service of supplemental production, and review for ESI compliance
9/3/2021	CAN	4	Research and review of regulatory payment history, identified documents of notes for claim file materials and draft of discovery summary
9/3/2021	CAN	0.3	Draft email to team re: regulatory payment history, identification of documents of note, discover summary
10/8/2021	CAN	0.9	Ingest and ESI compliance review of Defendants 005 production
10/15/2021	CAN	0.5	Ingest and ESI compliance review of Defendants 006 production
10/15/2021	CAN	0.2	Document review of Defendants production to date
10/15/2021	CAN	0.1	Draft update to discovery summary
10/16/2021	CAN	0.2	Draft email to Plaintiff team re: survey for inspection fees
10/18/2021	CAN	0.7	Draft deficiency letter re: Defendants hyperlinked documents

10/19/2021	CAN	0.2	Strategy/coordination call with Attorneys Judkins and Normand re: deficiency letter
10/19/2021	CAN	0.1	Email re: Strategy call with Amy/Normand re: deficiency letter and cattle call for other deficiencies
10/19/2021	CAN	0.2	Review 10/19/21 adjuster deposition exhibits
10/20/2021	CAN	0.2	Review deficiency re: production of "documents relevant to USAA databases"
10/20/2021	CAN	0.1	Draft email to team re: review deficiency of production of "documents relevant to USAA databases"
10/28/2021	CAN	2	Research and review inspection, emissions, and automation vs PH fees
10/28/2021	CAN	0.5	Draft email to Plaintiff team re: research findings on inspection, emissions, and Automation vs PH fees
11/2/2021	CAN	0.2	Email to Expert Institute, re: inspection fees
11/5/2021	CAN	0.1	Review of D notice of Arevalo and Simon depo notice
11/5/2021	CAN	0.4	Search for inspection fee expert, Texas university/educational based potential leads
11/12/2021	CAN	0.1	Review email from attorney Mandel re: discovery ingest status and review
11/12/2021	CAN	0.1	Review email from attorney Mandel re: discovery ingest status and review, additional
11/16/2021	CAN	0.1	Email of Disco summary to team, update on D 006 discovery ingest
11/16/2021	CAN	3.1	Resarch inspection fees, prior surveys of the same, ERG work for TX
11/16/2021	CAN	0.3	Email to team re: finding of ERG work for TX, prior inspection survey
11/18/2021	CAN	2	Draft deficiency letter re: hyperlinked documents
11/19/2021	CAN	0.2	Emails and out reach with expert Charles Goodhue
11/19/2021	CAN	0.7	Research and review TCEQ government surveys re: inspection and emissions fees
11/19/2021	CAN	0.2	Draft email to Plaintiff team, re: strategy email, inspeciton fees experts
12/3/2021	CAN	0.2	Call with Attorney Mandel re: case needs, deficiency letter, inspection and emissions research
12/3/2021	CAN	4	Research, review, cite and source and draft of research findings re: emissions administraitve law, boundaries of emissions caps and exemptions

12/3/2021	CAN	0.5	Draft email to Plaintiff team re: findings on emissions administrative, research boundaries of emissions caps and exemptions, including research dump
12/6/2021	CAN	0.2	Draft to Plaintiff team re: strategy on deficiency requirements (year/make/model)
12/6/2021	CAN	0.3	Draft to Plaintiff team re: strategy on deficiency requirements (screen captures)
12/6/2021	CAN	0.6	Draft deficiency letter re: screen captures
12/8/2021	CAN	0.5	Zoom conference with attorney Mandel and opposing counsel re: discovery issues and resolution
12/30/2021	CAN	0.1	Read/review email from attorney Mandel re: discovery ingest and review status
1/3/2022	CAN	0.1	Telephone call with attorney Mandel re: discovery ingest and review status
1/14/2022	CAN	0.1	Read/review email from attorney Mandel re: discovery ingest and review status
1/21/2022	CAN	1	Ingest and ESI compliance review of Defendants 007 and 008 production
1/21/2022	CAN	1.1	Document review of Defendants production to date
1/21/2022	CAN	0.9	Draft update to discovery summary
1/22/2022	CAN	0.1	Read/review email from attorney Mandel re: Plaintiff discovery production issues
1/24/2022	CAN	1	Review incoming deficiency letters and existing production by Plaintiff
1/24/2022	CAN	0.5	Review expert Stockton class analysis
1/24/2022	CAN	0.1	Read/review email from attorney Mandel and with attorney Judkins re: Plaintiff discovery production issues, resolution outreach
1/26/2022	CAN	0.1	Read/review email from attorney Mandel re: discovery ingest and review status
1/27/2022	CAN	1.5	Ingest and ESI compliance review of Defendants 009 production
1/27/2022	CAN	0.2	Draft email to Plaintiff team re: 009 production issues
1/28/2022	CAN	0.6	Re-review and draft timeline of Defendants claims, Defendants 008 production
1/28/2022	CAN	0.2	Draft email to Plaintiff team re: timeline of Defendants claims, Defendants 008
1/28/2022	CAN	0.5	Draft deficiency letter re: hyperlinked docs and redaction log
1/28/2022	CAN	0.3	Ingest and ESI compliance review of Defendants 010 production

1/28/2022	CAN	0.1	Read/review email from attorney Mandel re: discovery ingest and review status, Defendants redactions
2/10/2022	CAN	0.1	Read/review email from attorney Mandel and with attorney Normand re: Defendants fees being paid, CRA policies
2/17/2022	CAN	0.1	Read/review email from attorney Mandel re: discovery ingest and review status
2/18/2022	CAN	0.3	Ingest and ESI compliance review of Defendants 011 production ingest and review
2/18/2022	CAN	0.5	Document review of Defendants production to date
2/18/2022	CAN	0.2	Draft update to discovery summary
2/18/2022	CAN	0.2	Draft mail to Plaintiff team re: Defendants 011 issues of note
2/19/2022	CAN	0.1	Read/review email from attorney Mandel re: class spreadsheet versions, provision to expert Stockton
4/26/2022	CAN	0.6	Review 3rd amended complaint
4/26/2022	CAN	0.2	Draft email to team re: Complaint and dealer fee claim
5/2/2022	CAN	3	Put together Stockton discovery for production
5/2/2022	CAN	0.1	Prepare Stockton discovery for service and ESI compliance
5/2/2022	CAN	0.7	Telephone call with attorney Mandel re: production needs for expert Stockton foundational documents, declaration, and associated exhibits
5/31/2022	CAN	0.5	Prepare additional Stockton discovery for service and ESI compliance
5/31/2022	CAN	0.1	Read/review email from attorney Mandel re: discovery preparation needs for Stockton related production and coordination
6/9/2022	CAN	0.1	Read/review email from attorney Mandel re: discovery preparation needs for Stockton related production and coordination follow up
7/18/2022	CAN	0.1	Review mediation engagement letter
8/7/2022	CAN	0.1	Read/review email from attorney Mandel re: D expert discovery ingest and review status
8/8/2022	CAN	0.5	Ingest and ESI compliance review of D expert production 01
8/8/2022	CAN	2.5	Initial document review of D expert production
8/8/2022	CAN	0.1	Read/review email from attorney Mandel re: D expert discovery ingest and review status, and summary, follow up
8/9/2022	CAN	0.2	Telephone call with attorney Mandel: class reply needs from production, production research
8/9/2022	CAN	2	Continued document review of D expert production

8/9/2022	CAN	0.3	Draft email to Plaintiff team re: D expert production and summary findings
8/9/2022	CAN	0.5	Draft D expert production summary for attorneys eyes only distribution, ESI compliance review of same
8/10/2022	CAN	2	Read/review Defendnats response in opposition of class certificaion
8/11/2022	CAN	0.3	Telephone call with attorney Mandel re: appraisal clause invoked and leased vehicle claims, and D expert report issues
8/12/2022	CAN	5	Reasearch and review identifying appraisal clause invoked and leased vehicle claims
8/12/2022	CAN	0.2	Email to attorney Jeeves re: theft prevention fee notice language, strategy
8/12/2022	CAN	4	Research and review re: theft prevention fee notice language
8/18/2022	CAN	2	Research and review of D expert exhibits
8/18/2022	CAN	0.7	Telephone call with attorney Mandel re: D expert exhibit needs, reply issues
8/18/2022	CAN	0.2	Research review and compare militarycarlot.com vs cars.com, scope and accuracy of valuations
8/18/2022	CAN	1.3	Telephone call with attorney Mandel re: discovery review and document identification of appraisal files, and D expert foundational documents re: vehicle purchasing, and hot document identification
8/20/2022	CAN	0.2	Telephone call with attorney Jeeves re: potential exhbits re: D expert deposition
8/21/2022	CAN	0.1	Read/review email from attorney Mandel re: legal research needs
8/29/2022	CAN	0.6	Telephone call with attorney Mandel re: depositon document/exhibit needs
8/31/2022	CAN	0.5	Ingest and ESI compliance review of D expert 02 production
8/31/2022	CAN	0.3	Document review of D expert 02 production
8/31/2022	CAN	0.1	Email to Plaintiff team re: D D expert 02 production findings
9/1/2022	CAN	12	Review, preparation, and edit of deposition for D D expert deposition, including draft and preparation of all exhibits
9/1/2022	CAN	0.1	Draft email to court reporter and Defendants counsel re: D Tomlin depo exhibits
9/2/2022	CAN	0.5	Day of preparation of D expert deposition
9/2/2022	CAN	5	Attend and partipate in D expert deposition, second-chair
9/2/2022	CAN	0.5	Post D expert deposition debrief and review with attorney Jeeves

9/6/2022	CAN	0.4	Draft email to Plaintiff team re: deposition summary of D expert deposition
9/20/2022	CAN	0.1	Review of D expert deposition transcript
10/12/2022	CAN	2	Prepare Stockton Declaration Reply Foundational, and prepare for service and ESI compliance
10/21/2022	CAN	0.7	Ingest and ESI compliance review of Defendants 012 production, and mediation docs
10/21/2022	CAN	0.2	Emails to Attorneys Jeeves and Mandel re: viability of theft prevention fee notice language
10/24/2022	CAN	0.2	Research into 2013 version of theft prevention fee notice
10/24/2022	CAN	0.1	Emails to JLG Scott and Roger re: viability of theft prevention fee notice language, continued
11/2/2022	CAN	0.1	Telephone call with attorney Mandel re: spreadsheet update

EXHIBIT 4

EXPERIENCE AND QUALIFICATIONS

4. I have been practicing law for over 33 years, including approximately 20 years leading class action lawsuits. During that time, I have worked on hundreds of class actions cases, with settlements involving damages totaling over a billion dollars. My education, training and experience is listed in my C.V., attached as **Exhibit A**. I have handled all aspects of class action cases, from theory development to pleadings, from trial to settlement and all every step in between. I have briefed and argued motions to dismiss, class certification motions and summary judgment motions, interlocutory appeals of class certification and appeals of decisions on the merits. I successfully tried an arbitration defense in a class action case to a favorable verdict for Plaintiff. I have been lead counsel in class action cases before many federal circuit and federal district courts and in state court actions across the United States.

5. In my class action cases I keep contemporaneous time and I exercised billing judgment in cutting unnecessary, duplicative and/or excessive time billed for tasks performed by the attorneys and staff in my law firm at the time. In a number of cases, I also reviewed and reduced excess time billed by other firms in the exercise of my role as co-lead counsel. The work that I did on this litigation displaced other work that I would have worked on but for this action.

6. I have read literally hundreds of decisions in class action cases addressing settlement and the award of attorneys' fees. I have done so as part of a conscious attempt to stay abreast of the law in this area. I have also read significant amounts of empirical research on class action settlements and attorneys' fees awards, including multiple surveys and articles covering the 2015 to 2023 time-period, which I specifically read again in connection with this declaration. Notably, I have made law in the federal courts providing that fees for a class action lawyer are based on a comparison with other class action lawyers nationwide and not by looking at the fees

generated in non-class action matters in the local jurisdiction. I am aware of the local and nationwide market for class counsel.

7. Based upon the foregoing, I have very significant experience in evaluating the amounts of time that the tasks necessary to successfully prosecute a class action should take and the cutting of time in the exercise of billing judgment. I likewise have very significant experience with and knowledge of reasonable hourly rates for prosecuting complex class actions during the time period this case has been litigated. I also have extensive experience with the types and amounts of expenses, including expert fees, necessary to successfully prosecute complex class actions. I also have extensive experience with and knowledge of the percentages of common funds courts award in connection with class action settlements. I believe based upon the foregoing that I would qualify as an expert on the reasonableness of attorneys' fees and expenses incurred in connection with the successful prosecution of class actions to settlement.

OPINIONS

8. In my opinion, this Settlement was the outcome of vigorous, lengthy hard-fought litigation and settlement negotiations. At the outset of the case the Defendants tried to dismiss the case on the grounds that the case must be sent to binding appraisal. Defendants claimed that binding appraisal was mandated by the policy and would resolve all issues between the named Plaintiffs and the Defendants. In turn, Defendants sought to dismiss the class claims because the appraisal would end the litigation with the named Plaintiffs and then nobody would have standing to pursue claims on behalf of the class. After extensive briefing and oral argument, the Honorable Aaron Haas denied the motion to compel appraisal.

9. After the appraisal was denied, the Parties engaged in extensive discovery involving the review of thousands of documents and hundreds of thousands of data entry points.

The case required hiring multiple experts to establish both individual and class damages. Plaintiffs hired four experts, including an insurance expert, an expert from the Texas DHSMV regarding the myriad of regulatory fees incurred in the cost to purchase a replacement vehicle, a data expert to analyze the hundreds of thousands of data points that had to be compiled to determine class damages, and a damages calculation expert. Extensive discovery was performed on the merits of the various claims in the case.

10. The case was complicated because it included a variety of claims that included some but not all the named Plaintiffs' claims and included claims of class members that varied in the damages sustained by each member of the class. For instance, some named Plaintiffs alleged damages for failure to pay CRA sales tax which is sales tax on the additional 20% of the value of the total loss vehicle where CRA coverage applied. During the pendency of the case, Defendants changed their payment procedures for total losses. They added payments for CRA Tax and payments for registration fees and emissions fees. This was a class benefit brought about by this case, but it also added complication to the class because it required calculations of the damages that differed based upon the date of the adjusting procedures at issue at various times in the class period.

11. We conducted discovery, including regarding all the applicable insurance policies, all of the procedures related to the payment of Actual Cash Value (ACV) and CRA damages for total loss claims during the Class period. We obtained data consisting of the claim payments for total losses for over one hundred thousand class members. The Parties engaged in extensive discovery, involving the review of thousands of documents and hundreds of thousands of data entry points. The case required hiring multiple experts to establish both individual and class damages.

12. After the completion of discovery and full class certification briefing, the Parties agreed to mediate the case. Class counsel Roger L. Mandel, Scott Jeeves, Scott Edelsberg, Andrew Shamis, and I personally attended the mediation on November 3, 2022, in front of highly respected and experienced mediator Rodney Max. The negotiations were completely arm's length, non-collusive, and highly contentious. Indeed, it took another six weeks of negotiations, including another formal mediation session with Mr. Max on December 3, 2022, and ongoing communications through Mr. Max, plus an extensive review of data by both sides, before an agreement in principle was reached. Class Counsel did not negotiate regarding their fees and expenses and class representative service awards until after the benefits to the Settlement Class had been agreed upon. After that, it took almost four months to negotiate the details of the notice plan and the notice forms and draft and execute the formal Settlement Agreement.

13. The percentage of the damages pleaded for by the plaintiffs or calculated by their experts typically recovered by approved settlements in class actions is very low. One study of securities class actions showed the settlements on average recovered less than 15% of the potential damages. In my experience, large consumer and breach of contract class actions (involving potentially tens of millions of dollars in damages), typically recover less than 50% of the potential damages. Accordingly, a settlement of that type of case which recovers 100% of certain of the elements of ACV damage sought in this case (sales tax and CRA sales tax) and between 50% and 80% of other elements (Regulatory Fees--title fees, registration fees, safety inspection fees, and emissions fees) is exceptional. The only element of the case where Plaintiffs did not recover related to a claim for dealer fees which are not mandatory, are not government fees, and are not necessarily incurred in the cost to purchase a replacement vehicle because one can purchase a replacement vehicle from a private party or from a dealer that does not charge dealer fees. Plaintiffs'

compromise on this element of the case does not diminish the recovery since Plaintiff is unaware of any insurance company that pays dealer fees as part of ACV total loss settlements and the claim was unlikely to win in the courts as shown by a recent ruling by the 11th circuit denying the recovery of dealer fees in a virtually identical case. *Signor v. Safeco Ins. Co. of Ill.*, No. 21-13148 (11th Cir. Jul. 3, 2023).

14. Of course, Defendants were vigorously defending this case and had multiple legal and factual defenses to both certification and the merits. They were defended by very able counsel from one of the country's largest and best-known firms, Dykema Gossett PLLC. Between class certification practice, a certain attempt at an interlocutory appeal of certification summary judgment practice, trial, post-verdict motions and appeal, Plaintiffs faced a significant risk of recovering less than the Settlement recovers or nothing at all and taking 3 to 5 years to finalize whatever recovery they made.

15. I was the partner in charge of, performed or supervised and have personal knowledge of all the work performed in this case by Normand PLLC, Edelsberg Law P.A., and Shamis & Gentile P.A. (Normand Team").¹ The time entries of the attorneys and staff of Normand PLLC were recorded contemporaneously with the work and entered in the firms' billing software, which software produced the entries I later reviewed. The hours expended were the result of billing judgment—timekeepers at Normand PLLC do not include hours that were arguably duplicative or unnecessary. For example, I did not include in my time over 30 hours expended in reviewing filings, strategy sessions with co-counsel, and interactions with the Named Plaintiffs. Mr. Phillips did not include over 50 hours editing and revising filings and discovery papers on which he was

¹ The other lawyers in the Plaintiff team were supervised by Roger Mandel of the Jeeves Mandel Law Group, P.C. ("Jeeves Mandel"). Mr. Mandell is providing his own declaration supporting the work performed by the firms of record under his supervision.

not the primary drafter and on legal research that was arguably duplicative. Ms. Judkins did not include six hours prepping for and attending a deposition on which she was not the primary attorney. I also cut all paralegal time by 10% to account for potential overlap and duplication of efforts by other paralegals and staff on the team. I also have personal knowledge of, through consultation about and seeing the results of all the work performed by Edelsberg Law P.A., and Shamis & Gentile P.A. in this case. In addition, I have reviewed the time entries for all three firms which form the basis of the Timekeeper Lodestar Summary (“TLS”) attached as **Exhibit B** to this Declaration.

16. It is, therefore, my opinion that the total number of hours for Class Counsel that were part of the Normand Team, constitutes a reasonable number of hours spent by Class Counsel working on this case, taking into consideration the novelty and complexity of the issues presented by the case, the types of work performed, the quality of the opposition and the results achieved by the Settlement. The SG total lodestar, as set forth in the declaration submitted by Andrew Shamis, is \$316,183.38. The Edelsberg Law lodestar, as set forth in the declaration submitted by Scott Edelsberg, is \$257,625.00. The Normand PLLC lodestar, as seen in the summary attached as **Exhibit B**, is \$542,337.00. The Normand Team’s total lodestar, thus, is \$1,116,145.38. Based on my significant experience with class action settlement, claiming processes, overseeing settlements, and so forth, I conservatively estimate Mr. Phillips, Ms. Sherwood, and I will expend at least another 25 hours each to conclude the settlement process and secure final approval and providing payments to claimants. That would add \$45,000.00 to the lodestar, for a total of \$1,161,145.38, taking into consideration the factors set forth in Tex. Disciplinary R. Prof. Conduct 1.04(b).

17. Based on my experience and research detailed above², it is also my opinion that the hourly rates set forth in the TLS, including the \$750 per hour rate for Andrew Shamis and Scott Edelsberg performed in this case, are usual, customary and reasonable rates for attorneys and paraprofessionals of those experience levels performing work of this level in the National, New York and Dallas markets. Accordingly, it is my opinion that the \$1,161,145.38 set forth in the TLS represents a reasonable lodestar for the Normand Team’s work in this case.³

18. Further, based on my experience and research, it is my opinion that the attorney’s fees requested in the fee motion are reasonable under the factors set forth therein, including Tex. R. Civ. P 42(i) and the factors set forth in Tex. Disciplinary R. Prof Conduct 1.04(b).

19. This case was litigated on an entirely contingent basis. Because of the significant risk that Plaintiffs would lose on the merits or fail to secure class certification—particularly given the significant expense incurred—the Normand Team would not have accepted representation in this matter but for the possibility of a multiplier being applied to our lodestar. We faced a

² Some examples: *MSC Mediterranean Shipping Co. Holding S.A. v. Forsyth Kownacki LLC*, 2017 WL 1194372, at *3 (S.D.N.Y. 2017) (approving rates of \$1,048.47 per hour for partners); *Williams v. Metro-North Railroad Co.*, 2018 WL 3370678, at * 3-4 (S.D.N.Y. June 28, 2018) *report and recommendation adopted*, No. 17 CIV. 3847 (JGK), 2018 WL 3368713 (S.D.N.Y. July 10, 2018) (approving \$800 per hour for partners in a complex employment discrimination matter); *Vista Outdoor Inc. v. Reeves Family Jr.*, 16 Civ. 5766, 2018 WL 3104631, at *6-7 (S.D.N.Y. May 24, 2018) (approving \$1,260 per hour for partners, finding them “not excessive in the New York City ‘big firm’ market”); *United States Bank Nat’l Ass’n v. Dexia Real Estate Capital Mkts.*, No. 12-cv-9412, 2016 WL 6996176, at *8 (S.D.N.Y. Nov. 30, 2016) (approving \$1,055 per hour for partners in complex commercial litigation, finding rates above \$1,000 not uncommon in the context of commercial litigation); *Union of Orthodox Jewish Congregations of Am. v. Royal Food Distribs. Ltd. Liab. Co.*, 665 F.Supp.2d 434, 437 (S.D.N.Y.2009) (approving \$735 per hour for partner); *U.S., ex rel. Fox Rx, Inc. v. Omnicare, Inc.*, No. 12 Civ. 275 (DLC), 2015 WL 1726474, at *3 (S.D.N.Y. Apr. 15, 2015) (approving \$836 per hour for partner with 20 years’ experience and \$631.75 for eighth-year associate).

³ The Normand Team’s practice is to maintain detailed and specific explanations for each individual time entry. As such, our complete billing is extremely voluminous, constituting hundreds of pages. If the Court wishes to review the specific, individual time entries, however, we are happy to submit the time entries as a supplemental filing should the Court so order.

significant risk of not receiving any compensation for the thousands of hours worked in this matter and having to eat the over \$45,000.00 in hard costs. Given this risk, the possibility of a multiplier accounting for such risk was dispositive to our decision as to whether to incur that risk and litigate this case.

20. As set forth in the summary attached to the Declaration as **Exhibit C**, Class Counsel Normand Team incurred \$45,126.54 in expenses throughout this litigation. We carefully considered whether they were necessary and reasonable before incurring them. In my opinion, these expenses are not only reasonable but in fact very low given the results achieved, the length of this litigation, and the fact that Class Counsel hired and worked with four experts.

21. I personally worked with Ms. Arevalo and Mr. Simon in this matter. Both Plaintiffs expended significant amount of time in, amongst other things, reviewing court filings, following up and seeking updates on the litigation, sitting for a lengthy deposition, gathering and producing documents in response to discovery requests, meaningfully participating in mediation, and so forth. In my opinion, Ms. Arevalo and Mr. Simon both performed their fiduciary duty to absent class members in an admirable manner and were excellent class representatives. They provided input in negotiating the terms of the Settlement for Class Members, insisted on favorable terms, including the robust Notice and extremely simple claiming process, and otherwise significantly advanced the litigation and the interests of the Class Members. For these reasons, I believe a \$5,000.00 service award would be eminently reasonable.

My name is Edmund A. Normand, and my work address is 3165 McCrory Place, Suite 175, Orlando, FL 32803, United States of America. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Orange County, Florida, on the 11th day of August, 2023.

/s/Ed Normand
Edmund A. Normand

EXHIBIT A

RESUME OF EDMUND A. NORMAND

NORMAND PLLC is a consumer litigation and trial law firm with offices in Orlando, Florida. Founded by Edmund A. Normand, the focus of the firm is complex consumer class action and complex tort litigation.

Mr. Normand has been a member of the Florida Bar since 1990. He gained invaluable, early experience in general tort and medical malpractice cases at his first job working under the tutelage of the late Al Cone, a founder of the Florida Justice Association and one of the preeminent trial lawyers in the history of Florida Civil Trial Law. In 1991, Butch Wooten offered Ed a position to work for the firm of Wooten, Honeywell and Kest, a firm with long history of trial excellence in Orlando since it began in 1966. Mr. Normand then joined the ranks of storied firm alumni that include a former Mayor of Orlando, a former Mayor of Orange County, a United States Senator and eminent sitting Judges in Orange County, Florida. He was elected a shareholder of the firm in 1996. The firm was named Wooten, Kimbrough and Normand P.A. With that firm, Mr. Normand has been honored with the highest Tier One ranking for Orlando in the Best Law Firms Report issued by U.S. News & World Report Magazine for four consecutive years. Ed is now the founder of Normand Law PLLC d/b/a Normand PLLC.

Mr. Normand has been honored for many accomplishments in consumer and personal injury litigation. His current and past professional memberships, court memberships and awards include:

- Florida Justice Association
- The American Association of Justice
- Board Certified Civil Trial Lawyer 2002 (re-certification in 2007, 2012, 2017)
- Orange County Bar Association
- Central Florida Trial Lawyers Association, President 2011
- American Mensa Member

RESUME OF EDMUND A. NORMAND

- AVVO (Highest rating)
- AV Preeminent Rated by Martindale-Hubbell
- Certified Public Accountant, Maryland, 1990
- Lexis Counsel Connect, Leader Florida Torts Group
- United States District Court for the Middle District of Florida
- United States District Court for the Southern District of Florida
- United States 11th Circuit Court of Appeals
- Federal Court of Claims
- ABOTA
- High score recognition Florida Bar Exam
- Chancellor at University of Texas Law School. Since 1912, Chancellors has recognized the law students who have achieved the highest grade point averages in their class through their second year of school

Mr. Normand has won many significant jury verdicts and settlements in past and present matters including cases involving: Daimler Chrysler, Ford, General Motors, Emeritus Corporation, Disney, Universal, Ace American Insurance Company, Allstate, Covidien, Lasko Manufacturers, Nationwide, State Farm, Orlando Regional Healthcare, Florida Hospital, HCA, The United States of America, The State of Florida, most of the leading insurance companies in the U.S., Wal-Mart, Target, BCBS of Florida, Royal Caribbean and numerous other large corporations. Mr. Normand has also been lead counsel on several TCPA actions.

RESUME OF EDMUND A. NORMAND

Ed Normand is or has been involved in a number of past and present putative class actions including:

- Lead class counsel in *Roth v. Geico Gen. Ins. Co.*, No. 16-62942-Civ-DIMITROULEAS, a certified class of thousands of GEICO insureds who were not paid sales tax or tag and title fees for their total loss leased vehicles. Summary judgment was awarded to the class for all of the damages sought in the case;
- Lead counsel in *Venerus v. Avis Budget*, Case No. 6:13-CV-921-CEM-GJK a once-certified class action concerning breach of contract and FDUTPA claims for the failure to procure rental car insurance to hundreds of thousands of car-renters; He briefed and conducted oral argument in the *Venerus* appeal related to the dismissal of FDUTPA claims, denial of a breach of contract class and class decertification. *Venerus v. Avis Budget Car Rental, LLC*, 723 F. App'x 807, 809 (11th Cir. 2018). Mr. Normand successfully procured a reversal and remand on the denial of class certification;
- Normand served as counsel in *Resnick v. AvMed, Inc.*, a certified and settled class action which made important law in the data breach jurisprudence in the 11th Circuit. *Resnick v. AvMed, Inc.*, 693 F.3d 1317, 1325 (11th Cir. 2012);
- Lead counsel in *Morgan v. Ace American Ins. Co.* Case No. 3:16-cv-705-BJD-MCR, a putative class action involving alleged deceptive practices and breach of contract related to fees added onto insurance policies beyond the stated and advertised policy rate in Florida motor vehicle rentals;
- Lead counsel in *Cross v. Point and Pay*, Case No. 6:16-cv-01182-CEM-KRS, a putative class action involving alleged deceptive practices and breach of contract related to charges for making electronic payments for utility bills and other activities;
- Lead counsel in *Sos v. State Farm Mutual Insurance Company*, Case No. 6:17-cv-890-orl-18KRS, a putative class action involving an alleged breach of insurance obligation to pay sales tax or tag and title fees owed to State Farm insureds for their total loss leased vehicles;
- Lead counsel in *Sullivan v. Geico*, Case No.: 6:17-cv-891-Orl-40KRS, a putative class action involving an alleged breach of insurance obligation to pay tag and title fees owed to Geico insureds for their total loss leased vehicles across the United States;
- Counsel in *Mobley v. Bank of America*, a Florida state putative class action related to the alleged failure to refund insurance to foreclosed borrowers after the foreclosure sale;
- Lead counsel in *Giordani v. Ascendant Insurance Company*; a Florida state putative class action related to alleged breach of insurance obligation to pay tax, tag and title fees owed to insureds, primarily Uber and Taxi drivers, for their total loss leased vehicles across the United States;
- Counsel in *Smith v. Fifth Third Bank*, a putative class action lawsuit in Ohio Federal Court related to alleged breach of banking agreements for excessive fees in consumer transactions;
- Several other putative class actions in TCPA, insurance, banking and data breach related matters in Florida and other states.

EXHIBIT B

EXHIBIT 2

NORMAND PLLC

Timekeeper	Position	Hourly Rate	Hours	Projected Hours
Ed Normand	Shareholder	\$925.00	360.00	40
Jacob Phillips	Partner	\$600.00	169.90	40
Amy Judkins	Associate	\$550.00	51.20	
Janna Sherwood	Paralegal	\$225.00	155.00	
Michelle Montecalvo	Paralegal	\$195.00	45.60	
Devi Ramprasad	Paralegal	\$175.00	84.80	

EXHIBIT C

Activities Export

2023-07-31

8:20 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
2023-07-31		File Retention Fee ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Kaitlyn Thompson	1.00	\$50.00	-	\$50.00
2023-07-31		E106 Online research: Lexis Advance from 5-13-2022 to date ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Kaitlyn Thompson	1.00	\$76.83	-	\$76.83
2023-07-31		E108 Postage: Papercut Printing and Postage from 5/13/2022 to date ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Kaitlyn Thompson	1.00	\$32.95	-	\$32.95
2023-07-11		E121 Arbitrators/mediators: December 2022 Mediation fee for Upchurch Watson White and Max ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Kaitlyn Thompson	1.00	\$1,875.00	-	\$1,875.00
2023-04-12		E119 Experts: SIVER Insurance I#22164 Expert: George Erickson Research; Review Documents; Prepare Expert Report; Telephone Conversation w/ E. Normand; Search re: Texas Rate Filings; Research Issues; Review Draft Report; Revise/Edit Report; Telephone Conversation with E. Normand; Prepare Budget Projections for 2023 Property Casualty Renewals; Email confer with J. Phillips; Finalize/Execute Report; Update/Send Prior Testimony Exhibit ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$6,575.00	-	\$6,575.00

\$0.00 **\$45,126.54**
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Activities Export

2023-07-31

8:20 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
2023-02-06		E115 Deposition transcripts: Phipps Reporting I#222856 DEPOSITION TRANSCRIPT OF:C/R: USAA Casualty Insurance Job Date: 2/8/2022 Phipps Reporting I#224246 DEPOSITION TRANSCRIPT OF:C/R: USAA Casualty Insurance Job Date: 2/4/22 ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$1,780.75	-	\$1,780.75
2022-11-16		E111 Meals: Ed Normand in Miami, FL for mediation on 11/3/ 2022. ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$50.84	-	\$50.84
2022-11-16		E111 Meals: Ed Normand in Miami, FL for mediation on 11/3/ 2022 ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$14.88	-	\$14.88
2022-11-07		E121 Arbitrators/mediators: Upchurch Watson White & Max Mediation Group I#22RAM-197 Mediation on November 3, 2022 ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$2,500.00	-	\$2,500.00
2022-11-04		E110 Out-of-town travel: VTS MIAMI TAXI MIAMI FL - EDMUND A NORMAND ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$60.89	-	\$60.89
2022-11-04		E110 Out-of-town travel: AIR ESSENTIALS 103 M MIAMI FL XXXX-XXXXXX-53009 - EDMUND A NORMAND	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$23.53	-	\$23.53

\$0.00 **\$45,126.54**
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Activities Export

2023-07-31
8:20 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
2022-11-04		Ed Normand, Uber for mediation travel ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$33.10	-	\$33.10
2022-11-03		E110 Out-of-town travel: Edmund Normand, Uber ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$5.48	-	\$5.48
2022-11-03		E110 Out-of-town travel: Edmund Normand, Uber ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$36.55	-	\$36.55
2022-11-03		E110 Out-of-town travel: Edmund Normand Flight Refund from American Airlines for mediation travel. ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	-\$468.20	-	-\$468.20
2022-11-02		E110 Out-of-town travel: Edmund Normand Flights to/from Arevalo Mediation, 11/3/2022 ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Kaitlyn Thompson	1.00	\$569.94	-	\$569.94
2022-11-02		E110 Out-of-town travel: Edmund Normand Hotel Reservation, Cancellation Number: 51395515. ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Kaitlyn Thompson	1.00	-\$675.74	-	-\$675.74
2022-10-27		E110 Out-of-town travel: American Airlines Ticket No.:0010614288585 Refund for: Main Cabin Extra ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	-\$33.52	-	-\$33.52
							\$0.00	\$45,126.54
							0.00h	0.00h

Activities Export

2023-07-31

8:20 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
2022-10-26		E119 Experts: Jeffrey Martin Invoice Dated: June 16th, 2022 totaling \$7,875.00 Consulting services 3/2/2022 - 6/16/2022 Research; Data Analysis; Phone Call; Declaration; Deposition Preparation ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$7,875.00	-	\$7,875.00
2022-10-26		E119 Experts: Jeffrey Martin Invoice Dated 6/29/22 for Deposition ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$625.00	-	\$625.00
2022-10-24		E110 Out-of-town travel: EAN Hotel Reservation at Courtyard Miami Downtown for mediation on 11/3/22. ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Kaitlyn Thompson	1.00	\$675.74	-	\$675.74
2022-10-24		E115 Deposition transcripts: Magna Legal Services d/b/a Kim Tindall Associates, LLC I#877538 Transcript of: Jeffrey Martin ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$345.33	-	\$345.33
2022-10-24		E110 Out-of-town travel: EAN Flight for Arevalo Mediation on 11/3/22. ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Kaitlyn Thompson	1.00	\$530.70	-	\$530.70
2022-10-17		Edmund Normand, American Airlines Record Locator: ZOBHON ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$399.19	-	\$399.19
							\$0.00	\$45,126.54
							0.00h	0.00h

Activities Export

2023-07-31
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
2022-10-17		E110 Out-of-town travel: Edmund Normand, American Airlines Record Locator: ZOBHON ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$67.04	-	\$67.04
2022-08-16		E115 Deposition transcripts: Magna Legal Services I#868290 Certified Copy of Transcript of Jeremiah Kuntz ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$682.65	-	\$682.65
2022-06-29		E119 Experts: Jeremiah Fletcher Kuntz I#JFK000003 Texas State Laws, Expert Report, Depo prep, Deposition ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$3,075.00	-	\$3,075.00
2022-06-17		E111 Meals: Deposition of Jeffrey Martin ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$127.12	-	\$127.12
2022-05-20		E108 Postage: Papercut Printing and Postage to 5/12/2022 ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Kaitlyn Thompson	1.00	\$429.58	-	\$429.58
2022-05-20		E106 Online Research Lexis to 5/12/2022 ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Kaitlyn Thompson	1.00	\$141.00	-	\$141.00
2022-05-17		E112 Court fees: Fee for Non-Resident Attorney, Jacob Phillips, in Arevalo v USAA, related to application for pro hac vice admission. Order ID 570498026 ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Michelle Montecalvo	1.00	\$255.88	-	\$255.88

\$0.00 **\$45,126.54**
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Activities Export

2023-07-31
8:20 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
2022-02-18		E119 Experts: George Erickson / SIVER Consultants Retainer ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$3,000.00	-	\$3,000.00
2022-01-25		E115 Deposition transcripts: Phipps Reporting I#202773, I#202864, 203576 Deposition Transcript of: Gabrielle Lombana, Sherise Payne-Robinson, Jennifer Porter ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$2,862.51	-	\$2,862.51
2022-01-18		E115 Deposition transcripts: Kim Tindall & Associates I#95978 Certified Copy of Transcript of Vivian Arevalo ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Lily Chin	1.00	\$451.65	-	\$451.65
2022-01-18		Payment to Jeeves Law Group - Quarterly Cost Share ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Lily Chin	1.00	\$2,839.92	-	\$2,839.92
2021-10-06		E119 Experts: Rubin Anders I#13794 Expert Consultant: Bruce Heffner ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Lily Chin	1.00	\$333.38	-	\$333.38
2021-07-29		Jeeves Law Group payment to Normand PLLC: Reimbursement for Case Expenses ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Amanda Walker	1.00	-\$3,001.56	-	-\$3,001.56
2021-06-03		E119 Experts: Jermiah Fletcher Kuntz I#JFK000001 Dates of Service 2/1/21 - 4/30/21	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Amanda Walker	1.00	\$2,850.00	-	\$2,850.00
							\$0.00	\$45,126.54
							0.00h	0.00h

Activities Export

2023-07-31

8:20 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
2021-03-16		FOIA Request for TT Simon ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julie Masters	1.00	\$6.75	-	\$6.75
2021-02-08		FOIA Request - Plaintiff Arevalo ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julie Masters	1.00	\$6.75	-	\$6.75
2021-02-08		FOIA Request - Plaintiff Arevalo ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julie Masters	1.00	\$6.75	-	\$6.75
2021-02-03		FOIA Request - Plaintiff Simon ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julie Masters	1.00	\$6.75	-	\$6.75
2021-02-03		FOIA Request - Plaintiff Stewart ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julie Masters	1.00	\$6.75	-	\$6.75
2021-02-03		FOIA Request #3 - Plaintiff Arevalo ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julie Masters	1.00	\$6.75	-	\$6.75
2021-02-03		FOIA Request #2 - Plaintiff Arevalo ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julie Masters	1.00	\$6.75	-	\$6.75
2020-11-19		E112 Court fees: Board of Law Examiners Fee ● Unbilled	Arevalo-USAA-Texas-Total Loss-12087 USAA-Texas-Total Loss	Julia Corbett	1.00	\$255.88	-	\$255.88
2020-05-01		Cross-Sell Dominion Database - Texas New/Used Vehicle data	Arevalo-USAA-Texas-Total Loss-12087	Julia Corbett	1.00	\$7,750.00	-	\$7,750.00
							\$0.00	\$45,126.54
							0.00h	0.00h

Activities Export

2023-07-31

8:20 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
	● Unbilled		USAA-Texas-Total Loss					
							\$0.00	\$45,126.54
							0.00h	0.00h

EXHIBIT 5

VIVIAN AREVALO, and MICAH.	§	IN THE DISTRICT COURT
SIMON, individually and on behalf of	§	
all others similarly situated,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	OF BEXAR COUNTY, TEXAS
	§	
USAA CASUALTY INSURANCE	§	
COMPANY, and GARRISON	§	
PROPERTY & CASUALTY	§	
INSURANCE	§	285th JUDICIAL DISTRICT
COMPANY	§	

**DECLARATION OF ANDREW SHAMIS IN SUPPORT OF CLASS COUNSEL'S
MOTION FOR APPROVAL OF ATTORNEYS' FEE AWARD
AND REIMBURSEMENT OF COSTS**

I, Andrew Shamis, declare as follows:

1. I am the founder and managing partner of Shamis & Gentile, P.A., and class counsel of record for the Plaintiffs in the above action, which was filed as a class action.
2. I have responsibility for this litigation and have personal knowledge as to all matters set forth in this Affidavit.
3. I graduated from University of Miami School of Law in December 2011. I am a member in good standing of the Florida Bar and have been since March 2012. I am also a member of the Texas, Georgia, Arizona, New York, Illinois, and Ohio Bar and have not had any adverse discipline history with any of the state Bars, or any of the federal district courts of which I am a member, at any point during my career as an attorney.

4. I have over eleven years (11) of litigation practice experience with a focus on contingent fee first-party insurance claims litigation, specifically contractual disputes between insureds and their insurance carriers as in this case. My practice includes both contingent individual claimant litigation, and class action litigation, focused on first-party insurance and contractual issues. This case was also taken on a contingent basis with my fees to be determined by the Court, based on my experience as a licensed attorney, and my experience in first-party insurance and class action litigation in both state and federal courts. A copy of my most current resume is attached as **Exhibit A** outlining my experience in greater detail. My role in this litigation was as class counsel and primarily involved responsibilities for client management, which included depositions and client preparation, discovery, discovery management, data management, and planning and strategy, in the pre-settlement phases and post-settlement phases in the above styles case. Through the completion of this case, I project that I will be responsible for, and engage in, additional work regarding approval of the settlement, management, and resolution of class member claims, and responding to inquiries about the settlement.

5. I have been approved as class counsel in numerous cases, some of which are identified on the attached **Exhibit A**.

6. I am familiar with the fees and costs customarily charged by attorneys and allowed by courts for attorney fees and costs in similar cases both in Texas and Florida, and in class actions litigating around the United States. I researched the reasonable value of the services provided in class action litigation, and I have applied that research to this declaration and my opinions herein.

7. In formulating my opinions herein, I also considered, among other things, the factors set forth in Texas Disciplinary Rules of Professional Conduct, Rule 1.04.

8. I also reviewed applicable case law, including but not limited to *Norman v. Housing Authority of City of Montgomery*, 836 F.2d 1292 (11th Cir. 1989), *Hensley v. Eckerhart*, 461 U.S. 424,433 (1983), and *El Apple I, Ltd. v. Olivas*, 370 S.W.3d 757 (Tex. 2012).

9. In reviewing the contemporaneous billing records kept by myself for this matter, and when exercising reasonable billing judgement, I am of the opinion and belief that the hours billed by my firm as reasonable. This is especially so as each of the firms retained by the Plaintiffs performed in clearly defined roles with minimal duplication of time. Plaintiff's counsel adopted a strict organizational plan to advance and resolve the claims in a time-efficient manner.

10. To account for any potential duplication of effort and in the furtherance of the exercise of billing judgement, I applied a reduction of 10% of the total time billed by Shamis & Gentile, P.A. in this matter, see paragraph 13 below for the exact amount of reduction.

11. Based on my over eleven (11) years of experience and consistent with the fees charged in similar class action work, my firm's billing rates in this matter are **\$225** for Paralegals, **\$750** for Partners, and **\$650** for less experienced Partners, for the substantive legal work which furthered the case.

12. Based on the foregoing rate, my firm's lodestar after the exercise of billing judgement as of August 10, 2023, is **\$316,183.38**, based on the time from the chart below multiplied by the applicable rates. In my opinion the following amounts of time for the services performed by myself, Andrew Shamis, and my firm, through August 10, 2023, and projected to be performed through the end of this case are reasonable:

Timekeeper	Title	Relevant Year	Rate	Actual Time	Projected Time	Total Time
Aliana Sayed	Paralegal	2018	225	25.45		25.45
Andrew Shamis	Partner	2012	750	221.3	15	236.3
Angelica Gentile	Partner	2013	750	72.65		72.65
Edwin Elliott	Partner	2020	650	126.95	5	131.95
Miriam Grigorian	Partner	2018	650	18.8		18.8
Stephanie Babani	Paralegal	2009	225	1.9		1.9
Post-Billing Judgement Reduction with Actual Total Time at 90% (438.35 hours rounded to the nearest tenth of an hour)				420		471.3

13. Based on the foregoing rate and using the time from the above chart, my firm's lodestar after the exercise of billing judgement (**reduced time 46.7 hours**) as of August 10, 2023, is **\$316,183.38**. In my opinion, the foregoing amounts of time for the services provided by Shamis & Gentile, P.A., through August 10, 2023, and projected to be performed through the end of this case are usual, customary, and reasonable.

My name is Andrew Shamis, my firm's physical address is 14 NE 1st Avenue, Suite 705, Miami, Florida 33132, United States of America. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Miami-Dade County, State of Florida, on the 10th day of August, 2023.

/s/ Andrew Shamis
Andrew Shamis

EXHIBIT A



SHAMIS & GENTILE, P.A.
CLASS ACTION LAW FIRM

Our Firm

Shamis & Gentile, P.A. has and continues to provide outstanding legal services in the Florida, New York, Texas, Georgia, Illinois, Ohio, and Arizona communities. Shamis & Gentile, P.A. distinguishes itself because of our experience and legal resources to handle virtually any case involving class action, mass tort, personal injury, personal injury protection, and contract disputes. Specifically, as it relates to class actions, Shamis & Gentile, P.A. has filed and litigated thousands of banking, insurance breach of contract, data privacy, deceptive and unfair trade practice and product liability. At Shamis & Gentile, P.A. our seasoned attorneys are some of the most innovative and progressive attorneys in the profession. Often, Shamis & Gentile, P.A. is called upon to litigate and settle cases that other law firms may not be able to handle on their own.

Shamis & Gentile, P.A. is committed to practicing law with the highest level of integrity in an ethical and professional manner. We are a diverse firm with lawyers and staff from all walks of life. Our lawyers and other employees are hired and promoted based on the quality of their work and their ability to treat others with respect and dignity.

Who We Are

Andrew Shamis is the managing partner at Shamis & Gentile P.A. Mr. Shamis heads the class action and mass torts division of the firm, where his extensive experience in civil litigation has gained him the reputation of an attorney who can deliver where it matters the most, monetary results for his clients. Mr. Shamis has recovered over 1 billion dollars for consumers and plaintiffs throughout the country through his relentlessness, expertise, and calculated approach. Mr. Shamis is routinely certified class counsel and has successfully litigated over 10,000 civil cases in his young career.

Mr. Shamis is admitted to practice law in the states of Florida, New York, Georgia, Ohio, Illinois, Arizona, and Texas, as well as the U.S. District Courts for the Southern, Middle, and Northern Districts of Florida, Northern, Eastern, Western, and Southern Districts of New York, Northern and Southern District of Illinois, Eastern and Western Districts of Michigan, Eastern and Western Districts of Wisconsin, Northern District and Southern Districts of Ohio, Eastern and Western Districts of Missouri, Western and Northern Districts of Oklahoma, Northern, Western, Eastern, and Southern District of Texas, Middle District of Tennessee, US District Court of Colorado, and the US District Court of Nebraska.

Mr. Shamis specializes in Consumer Protection Class Action Litigation, Mass Torts, Personal Injury, Personal Injury Protection, Wrongful Death, as well as General Civil Litigation.

Angelica Gentile is a named partner at Shamis & Gentile P.A. Ms. Gentile heads the catastrophic injury, personal injury, and personal injury protection departments of Shamis & Gentile, P.A. Ms. Gentile is recognized throughout the legal community as an extremely professional and efficient attorney. A consistent favorite, clients routinely rave about how well Ms. Gentile works to protect their interests and advocate on their behalf. Ms. Gentile is admitted to practice law in both Florida and Texas and has extensive civil litigation experience, involving hundreds of depositions and motions throughout the state of Florida. Ms. Gentile not only prides herself in collecting millions of dollars in benefits owed to clients, but also in forging long lasting, successful relationships with clients.

Ms. Gentile specializes in Personal Injury, Personal Injury Protection, Class Action Litigation (TCPA, Banking, insurance breach of contract, data breach, unfair and deceptive trade practices), Wrongful Death, Wrongful Termination, as well as General Civil Litigation.

Mariam Grigorian is a partner at Shamis & Gentile, P.A. Mrs. Grigorian's practice involves all aspects of complex, high-level class action litigation. Mrs. Grigorian has extensive experience litigating claims in multiple state and federal jurisdictions across the country involving consumer fraud, deceptive and unfair trade practices, false advertising, insurance, privacy, and complex commercial disputes. Mrs. Grigorian has assisted in litigating hundreds of cases and recovering millions of dollars owed to clients.

Garrett Berg is a partner at Shamis & Gentile, P.A and leads the firms Telephone Consumer Protection department of Shamis & Gentile, P.A. Mr. Berg's practice involves all aspects of federal and state civil litigation with a focus on consumer-protection class action lawsuits. Mr. Berg has been responsible for recovering millions of dollars owed to clients and class members across the nation and has litigated hundreds of cases.

Edwin Elliott is a partner at Shamis & Gentile, P.A. Mr. Elliott's practice focuses on high-level, consumer class actions. Mr. Elliott's represents clients in federal and state courts across the nation in class actions involving consumer fraud, deceptive and unfair trade practices, false advertising, predatory financial services, privacy, and complex insurance disputes.

Our staff sets the standard on being innovative and technologically savvy. This innovation and use of fully customized cutting-edge case management software allows us to create an unparalleled level of customer service and attention to detail with our clients, which has led to an exceptional growth rate rarely seen in law firms.

Shamis & Gentile, P.A. has the resources, infrastructure and staff to successfully represent large putative classes. The attorneys and staff are not simply litigators, but directors of creating successful results with the ultimate level of satisfaction by the clients.

Class Actions

Shamis & Gentile, P.A. has initiated and served as both lead counsel and co-lead counsel in hundreds of class actions, many of which have generated internet articles. Currently, the firm serves as lead counsel or co-counsel on over 100 class action lawsuits. The lawsuits range from all Districts of Florida to the Central District of California. Shamis & Gentile, P.A. has also successfully settled many Class Action cases prior to verdict.

Prominent Class Action Settlements

Over the years, Shamis & Gentile attorneys have obtained outstanding results in some of the most well-known cases.

- *Albrecht v. Oasis Power, LLC*, No. 1:18-cv-1061 (N.D. Ill. 2018) (\$7,000,000.00 Class Settlement)
- *Avila-Preciado v. Horace Mann Property and Casualty Insurance Company*, No. 19-CA-004683 (20th Judicial Circuit, Lee County) (\$150,000.00 Class Settlement)
- *Bellenger v. Accounts Receivable Management, Inc.*, No. 19-cv-60205-DIMITROULEAS (S.D. Fla. 2019) (\$425,000.00 Class Settlement)
- *Bloom v. Jenny Craig, Inc.*, No. 1:18-cv-21820-KMM, 2018 U.S. Dist. LEXIS 151686 (S.D. Fla. 2018) (\$3,000,000.00 Class Settlement)
- *Bracero, et. al. v. Mendota Insurance Company*, No. 19-CA-015886 (11th Judicial Circuit, Miami-Dade County) (\$790,000.00 Class Settlement)
- *Cortazar v. CA Management Services Parent, LLC*, No. 19-cv-22075 (S.D. Fla. 2019) (\$1,500,000.00 Class Settlement)
- *Cruz-Santiago v. Amica Mutual Insurance Company*, No. 19-CA-006930 (13th Judicial Circuit, Hillsborough County) (\$464,168.00 Class Settlement)
- *DeFranks v. Nastygal.com USA Inc.*, No. 19-cv-23028-DPG (S.D. Fla. 2019) (\$4,025,000 Class Settlement)
- *Deleon III, et. al. v. Direct General Insurance Company, et. al.* No. 19-CA-001636 (9th Judicial Circuit, Osceola County) (\$2,450,000 Class Settlement)
- *Dipuglia v. US Coachways, Inc.*, No. 17-23006-Civ, 2018 U.S. Dist. LEXIS 72551 (S.D. Fla. 2018) (\$2,600,000.00 Class Settlement)
- *Dunleavey v. Sunrise Detox III, LLC*, No. 18-cv-25090 (S.D. Fla. 2018) (\$500,000.00 Class Settlement)
- *Eisenband v. Schumacher Automotive, Inc.*, No. 18-cv-01061 (S.D. Fla. 2018) (\$5,000,000.00 Class Settlement)
- *Flores v. Village Ford, Inc.*, No. 2:19-CV-12368 (E.D. Mich. 2019) (\$1,050,000.00 Class Settlement)
- *Gottlieb v. Citgo Corporation*, No. 16-cv-81911 (S.D. Fla. 2016) (\$8,300,000.00 Class Settlement)

- *Halperin v. YouFit Health Clubs, LLC*, No. 18-CV-61722-WPD (S.D. Fla. 2018) (\$1,418,635.00 Class Settlement)
- *Hindes v. Ohio Mutual Insurance Company*, No. 20CV007627 (Franklin County, OH) (\$1,875,000.00 Class Settlement)
- *Jacques, et. al. V. Security National Insurance Company*, No. CACE-19-002236 (17th Judicial Circuit, Broward County) (\$6,000,000.00 Class Settlement)
- *Jones v. Washington State Employee's Credit Union*, No. 20-2-06596-5 (Superior Court of the State of Washington County of Pierce) (\$2,400,000.00 Class Settlement)
- *King v. Classic Chevrolet, Inc. et al.*, No. 4:19-cv-00429-CVE-JFJ (N.D. Okla. 2019) (\$850,000.00 Class Settlement)
- *Locke v. Nationwide Insurance Company of America*, No. 19-12148 CIDL (Fla. 7th Cir. Ct.) (\$540,000.00 Class Settlement)
- *Marengo v. Miami Resch. Assocs., LLC*, No. 1:17-cv-20459-KMW, 2018 U.S. Dist. LEXIS 122098 (S.D. Fla. 2018) (\$1,236,300.00 Class Settlement)
- *McGowan v. First Acceptance Insurance Company, Inc.*, No. 21-CA-004864 (Fla. 9th Cir. Ct.) (\$2,200,000.00 Class Settlement)
- *Mclean v. Brett A. Osborn, D.O., PLLC*, No. 18-cv-81222-DMM (S.D. Fla. 2018) (\$800,000.00 Class Settlement)
- *Ostendorf v. Grange Indem. Ins. Co.*, No. 2:19-CV-1147 (S.D. Ohio 2020) (\$12,000,000.00 Class Settlement)
- *Papa v. Greico Ford Fort Lauderdale, LLC*, No. 1:18-cv-21897 (S.D. Fla. 2018) (\$4,800,000.00 Class Settlement)
- *Patterson v. McCarthy Ford, Inc.*, No. 2020-CH-07042 (Circuit Court of Cook County, Illinois County Department, Chancery Division) (\$1,870,000.00 Class Settlement)
- *Pena v. John C. Heath, Attorney at Law, PLLC, d/b/a Lexington Law Firm*, No. 18-cv-24407-UU (S.D. Fla. 2018) (\$11,450,863.00 Class Settlement)
- *Petit Beau, et. al., v. Ocean Harbor Casualty Insurance Company*, No. CACE-18-029268 (17th Judicial Circuit, Broward County) (\$4,500,000.000 Class Settlement)
- *Picton v. Greenway Chrysler-Jeep-Dodge Inc. d/b/a Greenway Dodge Chrysler Jeep*, No. 19-cv-00196-GAP-DCI (M.D. Fla. 2019) (\$2,745,000.00 Class Settlement)
- *Poierier v. Cubamax Travel Inc.*, No. 1:18-cv-231240 (S.D. Fla. 2018) (\$808,734.00 Class

Settlement)

- *Prieto v. Crete Carrier Corporation*, No. 19-CV-60903-BB (S.D. Fla. 2019) (\$600,000.00 Class Settlement)
- *Rattner v. Tribe App. Inc.*, No. 17-cv-21344, 2017 U.S. Dist. LEXIS 198517 (S.D. Fla. 2017) (\$200,000.00 Class Settlement)
- *Robley v. IDS Property Casualty Insurance Company*, No. 2019-022263-CA-10 (11th Judicial Circuit, Miami-Dade County) (\$105,000.00 Class Settlement)
- *Smart, et. al. v. Auto Club Insurance Company of Florida, et. al.*, No. 19-CA-005580 (13th Judicial Circuit, Hillsborough County) (\$780,000.00 Class Settlement)
- *Suarez v. MAPFRE Insurance Company of Florida*, No. 19-02729-CA-01 (11th Judicial Circuit, Miami-Dade County) (\$633,525.25 Class Settlement)
- *Whitworth v. HH Entm't, Inc.*, No. 9:17-cv-80487-KAM, 2018 U.S. Dist. LEXIS 112223 (S.D. Fla. 2018) (\$750,000.00 Class Settlement)
- *Wijesinha v. Susan B. Anthony List, Inc.* No. 18-cv-22880 (S.D. Fla. 2018) (\$1,017,430.00 Class Settlement)

More About Shamis & Gentile, P.A.

To learn more about our firm, please visit www.shamisgentile.com, or view links to our blogs at <https://www.sflinjuryattorneys.com/blog/>.

EXHIBIT 6

VIVIAN AREVALO, and MICAH.	§	IN THE DISTRICT COURT
SIMON, individually and on behalf of	§	
all others similarly situated,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	OF BEXAR COUNTY, TEXAS
	§	
USAA CASUALTY INSURANCE	§	
COMPANY, and GARRISON	§	
PROPERTY & CASUALTY	§	
INSURANCE	§	285th JUDICIAL DISTRICT
COMPANY	§	

**DECLARATION OF SCOTT EDELSBERG IN SUPPORT OF CLASS COUNSEL'S
MOTION FOR APPROVAL OF ATTORNEYS' FEE AWARD
AND REIMBURSEMENT OF COSTS**

I, Scott Edelsberg, declare as follows:

1. I am the founder and managing partner of Edelsberg Law, P.A., and co-counsel of record for the Plaintiffs in the above action, which was filed as a class action.
2. I have responsibility for this litigation and have personal knowledge as to all matters set forth in this Affidavit.
3. I graduated from University of Miami School of Law in May 2012. I am a member in good standing of the Florida Bar and have been since November of 2012, and have not had any adverse discipline history with the Florida Bar, or any of the federal district courts of which I am a member, at any point during my career as an attorney.
4. I have over eleven years (11) of litigation practice experience with a focus on contingent fee first-party insurance claims litigation, specifically contractual disputes between

insureds and their insurance carriers as in this case. My practice includes both contingent individual claimant litigation, and class action litigation, focused on first-party insurance and contractual issues. This case was also taken on a contingent basis with my fees to be determined by the Court, based on my experience as a licensed attorney, and my experience in first-party insurance and class action litigation in both state and federal courts. A copy of my most current resume is attached as **Exhibit A** outlining my experience in greater detail. My role in this litigation was as associate co-counsel and primarily involved responsibilities for the research, discovery management, data management and validation, and planning and strategy, in the pre-settlement phases in the above styles case. Through the completion of this case, I project that I will be responsible for, and engage in, additional work regarding data management and validation, and management and resolution of class member claims.

5. I have been approved as class counsel in several cases some of which are identified on the attached **Exhibit A**.

6. I am familiar with the fees and costs customarily charged by attorneys and allowed by courts for attorney fees and costs in similar cases both in Texas, and in class actions litigating around the United States. I researched the reasonable value of the services provided in class action litigation, and I have applied that research to this declaration and my opinions herein.

7. In formulating my opinions herein, I also considered, among other things, the factors set forth in Texas Disciplinary Rules of Professional Conduct, Rule 1.04.

8. I also reviewed applicable case law, including but not limited to *Norman v. Housing Authority of City of Montgomery*, 836 F.2d 1292 (11th Cir. 1989), *Hensley v. Eckerhart*, 461 U.S. 424,433 (1983), and *El Apple I, Ltd. v. Olivas*, 370 S.W.3d 757 (Tex. 2012).

9. In reviewing the contemporaneous billing records, and when exercising reasonable billing judgement, I am of the opinion and belief that the hours billed by my firm as reasonable. See *Norman v. Housing Authority of City of Montgomery*, 836 F.2d 1292 (11th Cir. 1989). I can confirm, along with the other attorneys retained by the Plaintiffs, that each firm and timekeeper performed a clearly defined role with minimal duplication of time.

10. To account for any potential duplication of effort and in the furtherance of the exercise of billing judgement, I applied a reduction of 10% of the total time billed by my firm.

11. Based on my over eleven (11) years of experience and consistent with the fees charged in similar class action work, my firm's billing rates in this matter range from **\$500.00-\$750.00** for Partners. Although my staff and paralegals also expended time on this matter, I am not including the value of those hours in this fee petition in an abundance of caution to ensure there is no duplication or overlap with the hours expended by other paralegals in any of co-counsel's firms.

12. Based on the foregoing rate, my firm's lodestar after the exercise of billing judgement as of August 10, 2023, is **\$257,625.00**, based on the time from the chart below multiplied by the applicable rates. In my opinion the following amounts of time for the services performed by firm are reasonable:

Timekeeper	Actual Time
Scott Edelsberg	171.75
Chris Gold	137.65
Rachel Dapeer	34.35

13. Based on the foregoing rate and using the time from the above chart, my firm's lodestar after the exercise of billing judgement (**reduced time 55 hours**) as of August 10, 2023, is **\$257,625.00**. In my opinion, the foregoing amounts of time for the services provided by my

firm, through August 10, 2023, and projected to be performed through the end of this case are usual, customary, and reasonable.

My name is Scott Edelsberg, my firm's physical address is 20900 NE 30th Ave, 417, Aventura, Florida 33180, United States of America. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Miami-Dade County, State of Florida, on the 10th day of August, 2023.

/s/ Scott Edelsberg
Scott Edelsberg

EXHIBIT A

Scott Edelsberg's broad-based litigation experience representing both plaintiffs and defendants provides him with an invaluable perspective when prosecuting claims on behalf of consumers who have been harmed by corporate wrongdoing.

Scott Edelsberg is the founding partner of Edelsberg Law, PA and focuses his practice in the areas of class actions, consumer fraud and personal injury.

In connection with his representation in class action matters, Edelsberg has litigated cases in multiple state and federal jurisdictions throughout the country, including two multi-district litigation proceedings. In those cases, Edelsberg has won contested class certification motions, defended dispositive motions, engaged in data-intensive discovery and worked extensively with economics and information technology experts to build damages models. His efforts have led to numerous class settlements, resulting in millions of dollars in relief for millions of class members. Despite his young career, Edelsberg has been appointed class counsel in numerous national class action lawsuits and has been featured in *The Daily Business Review* twice.

Edelsberg is a native of South Florida and earned a Bachelor of Arts degree in Political Science from the University of Michigan. While at Michigan, he was awarded the Michigan Merit Scholar award and served as an intern for the Washtenaw County Public Defender's office. Edelsberg went on to receive a Juris Doctor degree, Cum Laude, from the University of Miami School of Law. While attending law school, he was on the Dean's List, a member of the *International and Comparative Law Review*, a Merit Scholarship recipient and served as an Equal Justice for America Fellow.

Notable Class Action Settlements:

- *Gattinella v. Michael Kors*, Case No. 1:14-cv-05731 (S.D. New York 2016) (Class settlement for \$4.875 million) (named class counsel);
- *Wildstein v. Seventh Generation, Inc.*, Case No. 3:15-cv-00205 (N.D. California 2016) (Class settlement for \$4.75 million) (named class counsel);
- *Gottlieb v. CITGO Petroleum Corporation*, Case No. 9:16-cv-81911 (S.D. Fla. 2017) (Class settlement for \$8.3 million) (named class counsel);
- *Seth F. Masson v. Tallahassee Dodge Jeep Chrysler, LLC*, Case No. 1:17-cv-22967 (S.D. Fla. 2017) (Class settlement for \$850,000) (named class counsel);
- *Jeanne and Nicolas Stathakos v. Columbia Sportswear Company*, Case No. 4:15-cv-04543 (N.D. California 2017) (Obtained classwide injunctive relief) (named class counsel);
- *Jessica Dipuglia v. US Coachways, Inc.*, Case No. 17-23006-Civ (S.D. Fla. 2018) (Class settlement for \$2.6 million) (named class counsel);
- *Zoey Bloom v. Jenny Craig Inc.*, Case No. 1:18-cv-21820 (S.D. Fla. 2018) (Class settlement for \$3 million) (named class counsel).