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19 Attorneys for Jeffrey Chen

20 UNITED STATES DISTRICT COURT  
21 NORTHERN DISTRICT OF CALIFORNIA  
22 SAN FRANCISCO DIVISION

23 JEFFREY CHEN,

24 Plaintiff,

25 v.

26 CHASE BANK USA, N.A., and DOES 1-  
27 100,

28 Defendants.

Case No. 3:19-cv-01082-JSC

**JOINT DECLARATION OF RAY E. GALLO,  
ALEXANDER DARR, AND DOMINIC  
VALERIAN IN SUPPORT OF PLAINTIFF'S  
MOTION FOR AN AWARD OF ATTORNEYS'  
FEES AND COSTS AND CLASS  
REPRESENTATIVE INCENTIVE AWARD**

Date: June 25, 2020

Time: 9:00 AM

Judge: Hon. Jacqueline Scott Corley

Courtroom: E-15th Floor

1 We, Ray Gallo, Alexander Darr, and Dominic Valerian, declare as follows:

2 1. Ray Gallo is a member in good standing of the California State Bar and a partner  
3 in the law firm Gallo LLP (“GALLO”), counsel for Plaintiff and the Class in this action.

4 2. Alexander Darr is a member in good standing of the Ohio State Bar and a member  
5 in the law firm Darr Law LLC (“DARR”), counsel for Plaintiff and the Class in this action.

6 3. Dominic Valerian is a member in good standing of the California State Bar and a  
7 partner in the law firm Valerian Law, P.C. (“VALERIAN”), counsel for Plaintiff and the Class in  
8 this action.<sup>1</sup>

9 4. We submit this declaration jointly in support of Plaintiff’s Motion for an Award of  
10 Attorneys’ Fees and Costs and Class Representative Incentive Award.

11 5. Except as otherwise noted, we have personal knowledge of the facts set forth  
12 herein with respect to the information provided regarding our respective law firms, and if called  
13 to testify thereto, could and would do so competently.

14 **Overview of the Case**

15 6. We began investigating this matter in November 2018 when Mr. Chen brought it  
16 to our attention. Before bringing suit, we reviewed Mr. Chen’s documentary evidence, researched  
17 applicable law, and thoroughly evaluated Mr. Chen’s claims.

18 7. On January 28, 2019, Mr. Chen filed this lawsuit in Alameda County Superior  
19 Court. The Complaint alleges that Defendant Chase Bank USA, N.A. now known as JPMorgan  
20 Chase Bank, N.A. (“Chase”) denied Mr. Chen’s credit card application and sent him an adverse  
21 action notice citing “previous unsatisfactory relationship with this bank” as the sole reason for  
22 denying his credit application. (Dkt. No. 1-1 ¶¶ 12-13; 18-19; Ex. A.) The Complaint alleges that  
23 Chase violated ECOA’s notice provision, 15 U.S.C. § 1691(d), because the adverse action notice  
24 it sent Mr. Chen did not include the specific reason(s) for the adverse action taken or disclose Mr.  
25 Chen’s right to a statement of those reasons. (*Id.* ¶¶ 12-17, 35.) The Complaint seeks certification  
26 of a nationwide class of persons to whom Chase sent a letter giving “previous unsatisfactory  
27

28 <sup>1</sup> Mr. Valerian represented Plaintiff as an attorney at GALLO until December 31, 2019. On  
January 1, 2020, he joined VALERIAN, where he continues to represent Plaintiff.

1 relationship with this bank” as the only reason for denying a credit application between January  
2 28, 2014 and the date of class certification, punitive damages of up to \$500,000 (the statutory  
3 cap), injunctive relief, and attorneys’ fees and costs. (*Id.* ¶ 23; Prayer for Relief ¶¶ 1-3.) Chase  
4 removed the case to the Northern District of California, it was assigned to this Court, and the  
5 parties consented to the jurisdiction of a magistrate judge pursuant to 28 U.S.C. § 636(c). (Dkt.  
6 Nos. 9, 16.)

7 8. On March 6, 2019, Chase moved to dismiss the Complaint on the grounds that:  
8 (1) its reason for denying Mr. Chen’s application was sufficiently specific, and (2) Mr. Chen  
9 lacked statutory standing because he did not allege discrimination or confusion. (Dkt. No. 8.)  
10 Plaintiff filed his Opposition on March 20, 2019 (Dkt. No. 19) and the Court heard oral argument  
11 on April 25, 2019. On May 6, 2019, the Court issued an Order denying Chase’s Motion to  
12 Dismiss because: (1) Plaintiff need not allege discrimination to fall within the zone of interests  
13 protected by ECOA’s notice requirement, (2) Plaintiff plausibly alleged confusion (assuming  
14 *arguendo* that ECOA imposed such a requirement), and (3) Plaintiff adequately alleged that  
15 Chase’s statement of reasons lacked the specificity ECOA requires. (Dkt. No. 23.)

16 9. The parties exchanged initial disclosures on May 23, 2019 and each side served  
17 written discovery requests shortly thereafter. Chase answered the Complaint on May 28, 2019.  
18 (Dkt. No 28.) An initial case management conference was held on May 30, 2019, at which the  
19 Court scheduled an early motion for summary judgment based on Chase’s contention that Mr.  
20 Chen lacked statutory standing and received a sufficiently specific adverse action notice because  
21 he allegedly knew why his credit application was denied.

22 10. On June 18, 2019, the parties scheduled a full day of mediation with Hon. Wayne  
23 D. Brazil (Ret.) for July 17, 2019 at JAMS in San Francisco. To facilitate the mediation and  
24 conserve resources, the parties agreed to stay formal discovery and informally exchange  
25 information. As part of this exchange, Chase produced approximately 650 pages of records  
26 pertaining to its relationship with Mr. Chen and provided the size of the class and the number of  
27 at-issue letters it sent during the class period. A week before the mediation, the parties submitted  
28 and exchanged detailed mediation statements, which thoroughly analyzed the relevant law, facts,

1 and the litigation risks both sides face.

2 11. On July 17, the parties spent a full day in mediation with Judge Brazil. The parties  
3 did not reach an agreement that day but made substantial progress and continued to negotiate over  
4 the following weeks. The parties reached a settlement in principle on August 9, 2019. Chase  
5 prepared the first draft of the settlement agreement and sent it to us on September 18, 2019. Two  
6 months of extensive negotiations concerning the final terms of the Settlement followed. On  
7 November 22, 2019, the parties executed a comprehensive Class Action Settlement Agreement  
8 and Release.

9 12. Plaintiff filed his Preliminary Approval Motion (Dkt No. 43) on November 22,  
10 2019 and the Court heard the motion on December 12, 2019. At the preliminary approval hearing,  
11 the Court requested several revisions to the settlement agreement and expressed concern with the  
12 cost of settlement administration.

13 13. After the preliminary approval hearing, the parties revised the settlement  
14 agreement to address the Court's concerns and obtained additional settlement administration bids.  
15 On January 13, 2020, we submitted a revised Class Action Settlement Agreement and Release  
16 (Dkt. No. 51, Ex. 1 ("Agreement")) and summarized the updated bid from the proposed  
17 settlement administrator Kurtzman Carson Consultants LLC ("KCC"). KCC's revised proposal  
18 capped administration costs at \$52,000 contingent upon there being no changes to the projected  
19 scope of work, a class size of 18,183 members, 95% of class members receiving email  
20 notification, mailed notification being sent to approximately 7,000 class members, and a 10%  
21 claims rate.<sup>2</sup>

22 14. On January 16, 2020, having considered the parties' supplemental submission, the  
23 Court granted preliminary approval of the Settlement. (Dkt. No 52.)

24 **Assessment of the Settlement**

25 15. The Settlement provides for Chase to pay "Settlement Class Consideration" of  
26 \$244,659 for: (1) payments to the Settlement Class ("Net Settlement Class Consideration"), (2) a

27 \_\_\_\_\_  
28 <sup>2</sup> We had previously estimated the claims rate at 7% based on an average claims rate of 7.37% in  
four similar cases involving consumer finance claims that KCC identified. (Dkt. No. 43 at 13:20.)

1 Class Representative Incentive Award of up to \$5,000, and (3) Notice and Settlement  
2 Administration Costs. (Agreement §§ 2.3, 3.2, 3.3.) KCC estimated the cost of settlement  
3 administration at \$52,000 (based on a 10% claims rate) in its winning administration bid and  
4 subsequently estimated taxes at roughly \$1,000.<sup>3</sup> With settlement administration costs of \$52,000,  
5 taxes of roughly \$1,000, and a \$5,000 incentive award, the Net Settlement Class Consideration  
6 would be approximately \$186,659. These preliminary figures and our assessment of the  
7 Settlement are subject to change after the claims process is complete and settlement  
8 administration costs are fixed.

9 16. Under 15 U.S.C. § 1691e(b), Chase’s potential liability on Class Members’  
10 punitive damages claims is capped at \$500,000, so Net Settlement Class Consideration of  
11 \$186,659, would amount to approximately 37% of the Settlement Class’s potential monetary  
12 recovery.

13 17. The Court will also enjoin Chase, for five years from the date of final approval,  
14 from using the phrases “‘previous unsatisfactory relationship with this bank’ and ‘previous  
15 unsatisfactory relationship with us or one of our affiliates’ in adverse action notices as the sole  
16 reason for denying credit card applications or otherwise taking an adverse action in connection  
17 with a Chase credit card account.” (Agreement § 3.5).

18 18. While Plaintiff believes his claims are meritorious and warranted imposition of the  
19 maximum punitive damage award, continued litigation would present substantial risks and costs,  
20 including the following.

21 19. First, any punitive damages recovery likely requires a finding that Chase acted  
22 recklessly. *See Anderson v. United Fin. Co.*, 666 F.2d 1274, 1278 (9th Cir. 1982) (holding that a  
23 punitive damages award under § 1691e(b) requires that the creditor “wantonly, maliciously or  
24 oppressively discriminates” or acts in “reckless disregard of the requirements of the law”). While  
25 Plaintiff contends ECOA’s text and implementing regulations unambiguously foreclose Chase’s  
26 contention that “previous unsatisfactory relationship with this bank” constitutes a specific reason,  
27

28 <sup>3</sup> Taxes were inadvertently omitted from the computation of the estimated cost of settlement  
administration in the Motion for Preliminary Approval.

1 a court or jury could find that Chase’s conduct was not reckless. *See, e.g., Safeco Ins. Co. of*  
2 *America v. Burr*, 551 U.S. 47, 69-70 (2007) (holding that defendant’s interpretation of the Fair  
3 Credit Reporting Act was incorrect, but not objectively unreasonable, and thus fell “well short of  
4 raising the ‘unjustifiably high risk’ of violating the statute necessary for reckless liability.”)  
5 Absent a punitive damage award, Settlement Class Members would not obtain a monetary  
6 recovery.

7 20. Second, Chase contends that whether an applicant is “aggrieved” under 15 U.S.C.  
8 § 1691e(a) and whether a statement of reasons is “specific” under 15 U.S.C. § 1691(d) should be  
9 determined based on the applicant’s unique knowledge or other individualized circumstances.  
10 There is little precedent on whether an objective or subjective standard governs these inquiries  
11 under ECOA. Were Chase’s view to prevail, it could preclude Plaintiff and other Class members  
12 from demonstrating statutory or Article III standing<sup>4</sup> or raise individualized issues that could  
13 preclude class certification.

14 21. Third, litigating the case through trial would likely entail significant discovery and  
15 motion practice, including summary judgment and class certification motions. Given the  
16 \$500,000 punitive damages cap, both sides’ fees and costs could easily exceed the amount at  
17 stake.

18 22. Based on our experience described below, our familiarity with the factual and legal  
19 issues in this case, the novelty of multiple legal questions in this case, the risk, delay, and  
20 uncertainty of continued litigation, the maximum potential monetary recovery, and the significant  
21 relief obtained, we believed the Settlement is fair, reasonable, and adequate.

### 22 **Complexity and Novelty of Issues Presented**

23 23. This case presents numerous novel issues, including: (1) whether Mr. Chen must  
24 plead or prove discrimination or confusion to fall within the “zone of interests” protected by  
25 ECOA, (2) whether Chase’s conduct raised the unjustifiably high risk of violating ECOA

26 \_\_\_\_\_  
27 <sup>4</sup> *See Ramirez v. Transunion LLC*, No. 17-17244, 2020 U.S. App. LEXIS 6338, at \*7 (9th Cir.  
28 Feb. 27, 2020) (“every member of a class certified under Rule 23 must satisfy the basic  
requirements of Article III standing at the final stage of a money damages suit when class  
members are to be awarded individual monetary damage”).

1 necessary for reckless liability and punitive damages under 15 U.S.C. § 1691e(b), and (3) whether  
2 an objective or subjective standard governs the determination of whether an applicant is  
3 “aggrieved” under 15 U.S.C. § 1691e(a) and whether a statement of reasons is “specific” under  
4 15 U.S.C. § 1691(d). Each of these issues presents novel questions of statutory interpretation that  
5 required us to thoroughly research and analyze ECOA’s text, implementing regulations,  
6 legislative history, and caselaw.

7 **Risk of Non-Payment**

8 24. We prosecuted this case on a contingent fee basis. Accordingly, our firms have  
9 received no compensation for our time or expenses, and have borne the risk of getting nothing if  
10 the case is unsuccessful.

11 25. In taking this matter on a contingent basis, our firms assumed considerable risk.  
12 Chase could have prevailed in motion practice, at trial or on appeal, resulting in no relief for Class  
13 Members and no fees or cost recovery for our firms. As discussed in the preceding sections, this  
14 action presents numerous novel legal issues that could preclude Plaintiff from certifying a class,  
15 prevailing on liability, or recovering monetary damages. Our risk was further exacerbated by  
16 ECOA’s \$500,000 punitive damages cap.

17 **Preclusion of Other Employment**

18 26. GALLO, DARR, and VALERIAN are each small firms with three or fewer  
19 attorneys. Each of our firms regularly declines potentially meritorious contingency cases and  
20 limits the amount of hourly work it takes on to litigate the cases it accepts. GALLO declines more  
21 than 95% of unsolicited inquiries from prospective clients who contact the firm seeking  
22 assistance. Accordingly, the more than 500 hours we devoted to this matter is time we could and  
23 would have spent on other billable matters had we not taken this case.

24 **Attorneys’ Fees**

25 27. Through March 9, 2020, our firms have expended 510.5 hours in attorney and  
26 paralegal time to successfully prosecute this action to a fair and reasonable settlement. Our firms’  
27 combined lodestar through March 9, 2020 is \$263,957.50 as summarized in the following table:  
28

<b>Timekeeper</b>	<b>Firm</b>	<b>Position</b>	<b>Rate</b>	<b>Hours</b>	<b>Lodestar</b>
Ray Gallo	GALLO	Partner	\$750	21.7	\$16,275.00
Dominic Valerian	GALLO	Partner	\$550	258.8	\$142,340.00
	VALERIAN	Partner	\$550	47.9	\$26,345.00
Alexander Darr	DARR	Partner	\$475	152.1	\$72,247.50
Marc van Anda	GALLO	Paralegal	\$225	30.0	\$6,750.00
<b>Total</b>				<b>510.5</b>	<b>\$263,957.50</b>

28. We will continue to invest time and resources in connection with the administration of the Settlement and the Motion for Final Approval after the filing of this motion. We anticipate the remaining work not included in the above lodestar will require at least 20 hours. Thus, the final lodestar and cost amounts will be higher than reported in this Motion.

29. Time entries reflecting our firms' work on this matter through March 9, 2020 are attached hereto as Exhibit 1. These entries describe tasks performed in 0.1 hour increments and were derived from our time records, which are prepared contemporaneously, and are maintained in the ordinary course of business. The entries have been revised to omit attorney-client or otherwise private information and correct errors.

30. Our time was spent on the following tasks, among others: (1) investigating and evaluating Plaintiff's claims and preparing the Complaint, (2) successfully opposing Chase's Motion to Dismiss, (3) preparing for and participating in mediation, (4) researching and analyzing legal and factual issues, (5) negotiating and documenting the Settlement Agreement, and (6) seeking Court approval of the Settlement.

31. The time we devoted to this case was reasonable given the stakes, the novelty and complexity of the issues presented, and the substantial resources Chase dedicated to defending this case. We prosecuted the claims efficiently and effectively, timely engaged in settlement discussions, and minimized any duplication of work by limiting the work to a small number of attorneys and staff.

32. Below are summaries of the qualifications of the professionals who spent time on this matter.



1           33.     Ray E. Gallo. Mr. Gallo graduated from Yale College with a B.A. in Economics  
 2 and Political Science in May 1987 and received his J.D. from the University of California, Los  
 3 Angeles School of Law in December 1991. He joined the Los Angeles office of Crosby, Heafey,  
 4 Roach & May (now Reed Smith) in February 1992. After two years at Crosby, he founded Gallo  
 5 & Associates (now Gallo LLP). In or about 1998, as only a sixth-year lawyer, Mr. Gallo received  
 6 Martindale Hubbell’s “AV” rating. Mr. Gallo has been actively involved in the prosecution of  
 7 consumer fraud class actions since 2004. Mr. Gallo has been approved and appointed as class  
 8 counsel multiple times and has obtained final approval of class settlements in the following class  
 9 action cases:

- 10           •     *Meier v. Rubios*, No. BC 335793 (L.A. Super. Ct.) (final approval granted 2006).
- 11           •     *Levinson v. Delivery Drivers, Inc.*, No. 05CC00022 (O.C. Super. Ct.) (final  
 12 approval granted 2007).
- 13           •     *Sutton v. Pinkberry*, No. 370909 (L.A. Super. Ct.) (final approval granted in 2008).
- 14           •     *Bienstock v. Ventura Foods*, No. BC 362937 (L.A. Super. Ct.) (final approval  
 15 granted 2008).
- 16           •     *Amador v. Cal. Culinary Academy, Inc.*, No. CGC-07-467710 (S.F. Super. Ct.)  
 17 (final approval granted 2012) (recovered \$40 million for false advertising).
- 18           •     *Bottoni v. Sallie Mae, Inc.*, No. C 10-03602 LB, 2013 WL 12312794 (N.D. Cal.  
 19 Nov. 21, 2013) (final approval granted November 21, 2013) (recovered estimated  
 20 \$76 million in debt relief and \$1 million in refunds, exclusive of fees, for excessive  
 21 collection charges).
- 22           •     *Huber v. San Diego Ballpark Funding, LLC*, No. 37-2013-00066456-CU-CO-CTL  
 23 (S.D. Super. Ct.) (final approval granted March 4, 2016) (recovered \$1.6 million,  
 24 exclusive of fees, for purchasers of personal seat licenses on breach of contract  
 25 claims).
- 26           •     *Schaffer v. Massage Green Int’l Franchise Corp.*, Case No. BC571914 (Cal. Super.  
 27 Ct., Los Angeles) (final approval of class settlement granted in 2017) (minimum  
 28 wage class and PAGA action).

- 1 • *Matera v. Google LLC*, No. 5:15-cv-04062-LHK (N.D. Cal.) (final approval  
2 granted February 9, 2018) (obtained injunction requiring Google to stop  
3 intercepting and processing emails to Gmail accounts for advertising purposes).
- 4 • *Tsyn v. Wells Fargo Advisors, LLC*, No. 14-cv-02552-LB (N.D. Cal.) (final  
5 approval granted November 1, 2018) (recovered \$9.5 million for failure to  
6 reimburse business expenses and late commission payments).
- 7 • *Kirby v. Excelsior I, Inc.*, No. 2019-CP-40-01109 (S.C. Court of Common Pleas)  
8 (final approval granted October 7, 2019) (recovered \$2 million for violations of  
9 Uniform Commercial Code notice requirements for vehicle repossession).

10 34. Mr. Gallo has also prosecuted consumer mass action lawsuits, including *Vasquez,*  
11 *et al. v. California School of Culinary Arts, Inc.*, No. BC393129 (L.A. Super. Ct.) (represented  
12 more than 1,400 plaintiffs after denial of class certification) and *Corley v. Google, Inc.*, No. 16-  
13 CV-00473-LHK (N.D. Cal.) (represented more than 875 plaintiffs after class certification was  
14 denied in prior actions). Mr. Gallo's practice continues to include meaningful commercial/hourly  
15 work, including the defense of two consumer class actions in the last five years. Mr. Gallo's  
16 hourly rate is \$750.

17 35. Dominic Valerian. Mr. Valerian graduated from the University of California,  
18 Davis with honors in 2002 and the University of Southern California Law School in 2005. From  
19 2005 to 2009, he worked at the Los Angeles office of Dewey & LeBoeuf, where he defended  
20 complex cases, including consumer class actions. In 2009, Mr. Valerian joined GALLO, where  
21 his practice focused primarily on prosecuting consumer and employment class and mass actions,  
22 including the *Amador, Bottoni, Huber, Schaffer, Matera, Vasquez, Corley, Tsyn,* and *Kirby* cases  
23 referenced above. Mr. Valerian was appointed co-class counsel with Mr. Gallo in *Bottoni, Huber,*  
24 and *Schaffer*. In January 2020, Mr. Valerian joined Valerian Law, P.C. Mr. Valerian's hourly rate  
25 for this matter is \$550.

26 36. Alexander Darr. Mr. Darr graduated *summa cum laude* from Mount Union  
27 University with a B.A. in Political Science. He received his J.D. from The Ohio State University  
28 in 2010, with honors and Order of the Coif. At law school, he served on the executive board for

1 the law review (The Ohio State Law Journal) and won a schoolwide oral advocacy competition.  
2 Shortly after graduation he was hired as a law clerk for the Honorable Edmond E. Chang, a  
3 United States District Court Judge of the United States District Court for the Northern District of  
4 Illinois. In 2012 he joined the law firm of Ungaretti & Harris LLP (now merged with Nixon  
5 Peabody) in its Chicago office. In 2013, he founded Darr Law LLC. Mr. Darr has been actively  
6 involved in the prosecution of consumer protection actions since that time, primarily through  
7 AAA and JAMS arbitrations. Mr. Darr also consults and advises small and medium businesses  
8 about arbitration and its costs and benefits. Mr. Darr has pursued more than 100 consumer  
9 arbitrations, many alleging claims under the Equal Credit Opportunity Act. Mr. Darr's practice  
10 continues to include meaningful commercial/hourly work, including defending of businesses  
11 regarding complex technology disputes and assisting real estate companies with their legal needs.  
12 Mr. Darr's hourly rate for this matter is \$475.

13       37.     Marc van Anda. Mr. van Anda graduated from the University of California,  
14 Berkeley with a B.A. in political science in 1983. He obtained his paralegal certificate in April  
15 2011 and joined GALLO in November 2011. Mr. Van Anda's hourly rate is \$225.

16       38.     We set our rates for this matter at or below prevailing market rates in the San  
17 Francisco area for attorneys and staff with comparable skill, experience, and qualifications,  
18 handling similar matters. We obtain information concerning market rates from other attorneys in  
19 the area who perform comparable litigation, from fee applications submitted in other cases,<sup>5</sup> and  
20 from information in the press.

21       39.     Courts in this district have approved Mr. Gallo, Mr. Valerian, and Mr. Van Anda's  
22 rates in the following matters:

23             a.     In *Tsyn v. Wells Fargo Advisors, LLC*, No. 14-cv-02552-LB (N.D. Cal.  
24 Nov. 1, 2018), the court approved the following GALLO rates in a lodestar cross-check:<sup>5</sup>

25  
26 \_\_\_\_\_  
27 <sup>5</sup> See Order Approving Class-Action and FLSA Settlement, Approving Attorney's Fees  
28 and Costs, and Entering Final Judgment at 19, *Tsyn*, No. 14-cv-02552-LB (Nov. 11, 2018) (ECF  
No. 172); Decl. of Ray E. Gallo ISO Ps' Mot. for Final Approval at 3, *Tsyn*, No. 14-cv-02552-LB  
(Sept. 6, 2018) (ECF No. 165-5) (stating requested rates).

<u>Professional</u>	<u>Position</u>	<u>Rate</u>
Ray Gallo	Partner	\$750
Dominic Valerian	Partner	\$550
Marc van Anda	Paralegal	\$225

b. In *Matera v. Google LLC*, No. 5:15-cv-04062-LHK (N.D. Cal. Feb. 9, 2018), the court approved the following GALLO rates in a lodestar analysis:<sup>6</sup>

<u>Professional</u>	<u>Position</u>	<u>Rate</u>
Ray Gallo	Partner	\$750
Dominic Valerian	Partner	\$550
Marc van Anda	Paralegal	\$225

c. In *Bottoni v. Sallie Mae, Inc.*, No. C 10-03602 LB, 2013 WL 12312794 (N.D. Cal. Nov. 21, 2013), the court approved the following GALLO rates in a lodestar analysis:

<u>Professional</u>	<u>Position</u>	<u>Rate</u>
Ray Gallo	Partner	\$650
Dominic Valerian	Partner	\$450
Marc van Anda	Paralegal	\$215

**Costs Incurred by Plaintiff’s Counsel**

40. Our firms have borne all costs incurred on behalf of Plaintiff in this litigation. Attached hereto as Exhibit 2 is an itemized summary of expenses incurred in the prosecution of action, including mediation, travel for hearings and mediation, legal research, filing and courier fees, postage, and other customary litigation expenses. As detailed in this exhibit, GALLO incurred expenses of \$6,192.93, DARR incurred expenses of \$2,333.14, and together our firms incurred expenses of \$8,526.07.

41. The foregoing expenses were incurred solely in connection with this litigation, were reasonably necessary for the prosecution of this action, and are reflected in our respective books and records as maintained in the ordinary course of business.

**The Class Representative’s Participation**

42. Plaintiff Jeffrey Chen has actively participated in this matter since bringing it to our attention in November 2018. Mr. Chen provided us with documents and information about his relationship with Chase, assisted with the preparation of formal and informal discovery responses,

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<sup>6</sup> See Order Granting in Part and Den. in Part Pls.’ Mot. for an Award of Att’ys Fees, *Matera*, No. 5:15-cv-04062-LHK (Feb. 9, 2018) (ECF No. 102) (approving requested rates for all Gallo LLP billers); Joint Decl. in Supp. Pls.’ Mot. for an Award of Att’ys Fees at 27, 38, 43, *Matera*, No. 5:15-cv-04062-LHK (Oct. 30, 2017) (ECF No. 97-1) (stating requested rates).

1 stayed abreast of case developments, and participated in settlement discussions. Throughout his  
2 participation in this matter, Mr. Chen has been responsive to counsel's requests and prioritized his  
3 responsibilities to the Class. Mr. Chen estimates that he has spent more than 40 hours on this  
4 case. Mr. Chen also ran the risk of paying Chase's costs if he lost and gave up significant  
5 financial privacy for the benefit of the class.

6 I declare under penalty of perjury under the laws of the United States of America that the  
7 foregoing is true and correct. Executed on March 24, 2020 at San Juan, Puerto Rico.

8  
9 /s/ Ray E. Gallo  
Ray E. Gallo

10 I declare under penalty of perjury under the laws of the United States of America that the  
11 foregoing is true and correct. Executed on March 24, 2020 at Fremont, Ohio.

12  
13 /s/ Alexander Darr  
Alexander Darr

14 I declare under penalty of perjury under the laws of the United States of America that the  
15 foregoing is true and correct. Executed on March 24, 2020 at Berkeley, California.

16  
17 /s/ Dominic Valerian  
Dominic Valerian

**ATTESTATION**

1 I, Dominic Valerian, am the ECF user whose identification and password are being used  
2 to file this Joint Declaration. I hereby attest that Ray Gallo and Alexander Darr have concurred in  
3 this filing.  
4

5 */s/ Dominic Valerian*

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Dominic Valerian

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# EXHIBIT 1

<b>FIRM</b>	<b>DATE</b>	<b>STAFF</b>	<b>TIME</b>	<b>DESCRIPTION</b>
DARR	11/30/2018	AD	0.2	Review email from DV regarding J Chen closure of Chase accounts
GALLO	12/3/2018	DV	0.4	Prepare fee sharing agreement for ECOA claims.
DARR	12/04/2018	AD	0.3	Email to RG and DV regarding Chen closure letter and ECOA landscape
GALLO	12/5/2018	DV	0.3	Draft ECOA complaint.
DARR	12/05/2018	AD	0.1	Email from DV
GALLO	12/6/2018	DV	1.1	Review MVA memo re J. Chen and email analysis to RG; email A Darr re Chen case.
DARR	12/06/2018	AD	0.3	Email from DV re ECOA memo. Review memo.
DARR	12/07/2018	AD	0.5	Email to DV and RG regarding Chase ECOA practices and relevant filings
GALLO	12/14/2018	DV	0.6	Draft ECOA complaint.
GALLO	12/14/2018	DV	0.8	Email J. Chen re ECOA claims.
GALLO	12/26/2018	DV	7.1	Draft ECOA complaint.
GALLO	12/27/2018	DV	1.6	Draft ECOA complaint and supporting documents.
DARR	12/27/2018	AD	0.4	Review draft ECOA complaint from DV. Review FSA from DV.
DARR	12/31/2018	AD	0.1	Email with DV
DARR	01/04/2019	AD	0.6	Revise draft complaint and email DV. Email DV and RG re FSA and litigation costs.
GALLO	1/7/2019	REG	0.6	Review case status and claims analysis
DARR	01/07/2019	AD	0.1	Email from DV re commonality in Chen ECOA
DARR	01/08/2019	AD	0.1	Email from DV re Chen FSA
GALLO	1/9/2019	DV	0.9	Draft complaint.
DARR	01/09/2019	AD	0.4	Review FSA revisions from RG. Email RG re same and litigation costs. Email from DV with revised complaint; review same.
DARR	01/11/2019	AD	0.2	Correspondence with DV regarding ECOA ruling in separate Chase arbitration. Review ECOA case law cited in ECOA ruling.
DARR	01/11/2019	AD	0.2	Email from RG re FSA. Execute same and return. Email to DV re ECOA case law applicable to Chen.
GALLO	1/12/2019	REG	0.1	Strategy analysis.
GALLO	1/14/2019	REG	0.2	Email re form of Complaint.
DARR	01/14/2019	AD	0.5	Emails with RG re credit card rewards systems and related adverse action.
GALLO	1/15/2019	REG	0.1	Email re strategy and pleading.
DARR	01/15/2019	AD	0.1	Email to RG re card rewards and adverse action
GALLO	1/23/2019	MVA	0.6	Prepare complaint filing documents and identify agent for service of process.
GALLO	1/23/2019	DV	1.2	Review ECOA materials from A. Darr.
GALLO	1/24/2019	REG	0.3	Review draft complaint
GALLO	1/25/2019	REG	0.2	Manage client communications and process



<b>FIRM</b>	<b>DATE</b>	<b>STAFF</b>	<b>TIME</b>	<b>DESCRIPTION</b>
DARR	01/25/2019	AD	0.4	Review revised Chen complaint. Email DV and RG re arbitration applicability.
GALLO	1/26/2019	DV	0.2	Exchange emails w/ J. Chen re class rep responsibilities.
GALLO	1/28/2019	MVA	0.4	File complaint and prepare service of process
GALLO	1/28/2019	DV	0.9	Review and finalize complaint.
DARR	01/28/2019	AD	0.1	Review revised Chen materials
DARR	01/29/2019	AD	0.1	Review conformed copies of Chen complaint.
GALLO	2/22/2019	DV	0.2	Review docket, circulate notice of CMC.
DARR	02/22/2019	AD	0.1	Review email re Chen litigation status
GALLO	2/25/2019	MVA	0.2	Prepare proof of service for court notices (CMC and judge assignment) and instruct SEA on service and filing.
GALLO	2/25/2019	DV	0.2	Review notice of assignment.
GALLO	2/27/2019	REG	0.2	Team comms re status.
GALLO	2/27/2019	MVA	1.8	Receive removal documents and update case file and calendar; draft certification of interested entities and consent to magistrate form.
GALLO	2/27/2019	DV	0.2	Email team re removal to fed court.
DARR	02/27/2019	AD	0.5	Review notice of removal and discuss with DV and RG.
GALLO	2/28/2019	MVA	0.2	Review client response and forward to REG and DV certification of interested entities or persons and declination of magistrate judge for review and approval.
GALLO	2/28/2019	DV	0.5	Email team re assignment of magistrate and necessary research; review A. Darr's initial research on issue.
GALLO	2/28/2019	DV	0.2	Update J. Chen re removal and impact on case.
GALLO	2/28/2019	DV	0.2	Review and revise certification of interested parties form.
GALLO	2/28/2019	DV	0.5	Review pertinent orders from Judge Corley to assess consent to magistrate jurisdiction.
DARR	02/28/2019	AD	0.2	Emails with DV and RG re Magistrate appointment.
DARR	02/28/2019	AD	0.1	Emails with DV and RG regarding analogous Chase ECOA matter and ECOA remedies.
DARR	02/28/2019	AD	1.3	Review Consent to Magistrate. Research Opinions for Potential Magistrate
GALLO	3/1/2019	MVA	2.4	Research opinions by magistrate judge Jacqueline Scott Corley.
GALLO	3/4/2019	REG	0.1	Review scheduling order.
DARR	03/05/2019	AD	0.2	Review email and attachments from OC (Petkis). Rvw email from RG.
GALLO	3/6/2019	MVA	0.7	Prepare e-service stipulation, receive service from opposing counsel, and update case templates.

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GALLO	3/6/2019	MVA	0.1	Revise consent to magistrate jurisdiction.
GALLO	3/6/2019	DV	0.6	Review emailed docs from OC (Order re Initial CMC, J. Corley Standing Order, etc.) and send to MVA for calendaring and filing; review Judge Corley decisions.
GALLO	3/6/2019	DV	0.7	Review Chase's MTD
DARR	03/06/2019	AD	0.1	Rvw emails from RG and OC (Soukup).
DARR	03/06/2019	AD	0.1	Emails w DV and RG re consent to Magistrate.
DARR	03/06/2019	AD	0.4	Email and attachments from DV re motion to dismiss and PHV. Review correspondence from client.
GALLO	3/7/2019	MVA	0.3	Revise e-service stipulation.
DARR	03/07/2019	AD	5.7	Research and draft response to MTD.
GALLO	3/8/2019	MVA	0.2	File e-service stipulation and email courtesy copy to counsel on stipulation.
GALLO	3/8/2019	DV	0.2	Review A. Darr's initial draft of Opp to MTD.
DARR	03/08/2019	AD	0.1	Review stip and consent.
DARR	03/08/2019	AD	7.4	Research and draft response motion to dismiss and circulate.
GALLO	3/11/2019	DV	1.2	Research Chase's "aggrieved" statutory standing argument in MTD.
DARR	03/11/2019	AD	0.1	Email from DV re MTD response.
GALLO	3/12/2019	MVA	1.1	Format opposition to motion to dismiss.
GALLO	3/12/2019	DV	6.1	Research and draft Chen MTD Opp.
DARR	03/12/2019	AD	0.1	Review formatted MTD Response
GALLO	3/13/2019	MVA	0.3	File consent to magistrate jurisdiction and certification of interested entities or persons.
GALLO	3/13/2019	DV	5.7	Review, revise, and research MTD Opp.
GALLO	3/13/2019	DV	0.6	Review A, Darr pro hac motion.
DARR	03/13/2019	AD	4.6	Emails with RG and DV re MTD response, review revisions. Additional revisions and circulate.
DARR	03/13/2019	AD	1.1	Prepare PHV application and send to DV for review. Acquire certificates for PHV app.
GALLO	3/14/2019	DV	7.0	Research and draft Opp to MTD.
GALLO	3/15/2019	DV	5.5	Draft Opp to MTD.
DARR	03/15/2019	AD	1.6	Review revised MTD response from DV.
DARR	03/18/2019	AD	6.2	Review Chen Motion Response. Revise. Research definitions. Add plain language component.
GALLO	3/19/2019	REG	2.7	Review and revise opposition to motion to dismiss
GALLO	3/19/2019	MVA	1.6	Add Table of Authorities to Opposition to motion to dismiss.
GALLO	3/19/2019	DV	0.2	Discuss MTD w/ RG and email team re same.
GALLO	3/19/2019	DV	3.9	Review and revise MTD Opp w/ RG's input.
DARR	03/19/2019	AD	0.5	Emails with DV and MVA. Review and verify TOA addition.
DARR	03/19/2019	AD	2.5	Revise response to Motion to Dismiss

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DARR	03/19/2019	AD	0.2	File PHV motion.
DARR	03/19/2019	AD	0.1	Review order from magistrate re PHV motion
GALLO	3/20/2019	REG	0.9	Review and revise opposition to motion to dismiss
GALLO	3/20/2019	MVA	0.6	File opposition to motion to dismiss and arrange for courtesy copy delivery.
GALLO	3/20/2019	DV	5.0	Review and revise MTD Opp.
DARR	03/20/2019	AD	0.1	Review order on MTD Reply.
GALLO	3/21/2019	MVA	0.1	Download client documents and file.
GALLO	3/21/2019	DV	0.2	Email J. Chen re gathering all adverse action notices from Chase.
DARR	03/21/2019	AD	0.1	Review correspondence from client re account closures.
DARR	03/27/2019	AD	1.2	Review and research reply to MTD
GALLO	4/24/2019	MVA	1.1	Prepare briefing documents for hearing on motion to dismiss.
GALLO	4/24/2019	DV	4.5	Prepare for hearing on MTD.
GALLO	4/25/2019	DV	6.0	Prepare for and attend hearing on MTD, including travel to and from SF.
DARR	04/25/2019	AD	0.1	Review order re MTD hearing.
DARR	04/25/2019	AD	0.1	Email with DV re hearing.
DARR	05/02/2019	AD	0.5	Email correspondence with DV and research related to same.
GALLO	5/6/2019	DV	0.2	Review order on motion to dismiss.
GALLO	5/6/2019	DV	2.5	Schedule initial meet and confer w/ OC ; review and outline topics for discussion at initial meet and confer; draft initial CMC statement.
GALLO	5/6/2019	DV	0.2	Email J. Chen re ADR certification.
DARR	05/06/2019	AD	0.1	Email correspondence with DV and OC scheduling CMC meet.
DARR	05/06/2019	AD	1.6	Review motion to dismiss order from J. Corley. Email correspondence with DV and RG regarding same. Schedule follow up call with DV. Research regarding confusion element in an ECOA claim. Review NDCA ADR Handbook and correspondence regarding same with client and DV.
DARR	05/06/2019	AD	0.1	Review ADR certificate and requirements.
GALLO	5/7/2019	DV	1.3	Call J. Chen re case status and ADR certification; research limitations on relief to class reps.
GALLO	5/7/2019	DV	1.4	Draft initial CMC statement and outline discussion points for initial meet and confer.
DARR	05/07/2019	AD	0.1	Email correspondence with DV re CMC statement. Review standing order.

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DARR	05/07/2019	AD	2.3	Correspondence with DV re class representative-specific treatment. Research re Staton v Boeing. Email correspondence with DV and RG re information from client. Related research. (Intentionally vague due to privilege).
DARR	05/07/2019	AD	0.1	Emails with DV and RG regarding case evidence.
DARR	05/07/2019	AD	0.1	Emails with client re matter.
GALLO	5/8/2019	REG	0.1	Email re meet and confer obligations.
DARR	05/08/2019	AD	0.1	Email correspondence with DV and OC re CMC meet-confer. Replies to same.
DARR	05/08/2019	AD	0.3	Correspondence with DV and RG re discovery, punitive damages, and CMC Statement
GALLO	5/9/2019	MVA	0.9	File ADR certification and draft initial disclosures and prepare production.
GALLO	5/9/2019	DV	2.6	Review A. Darr input on meet and confer outline; prep for and participate in initial meet and confer; debrief and discuss strategy w/ A. Darr; update client re meet and confer.
GALLO	5/9/2019	DV	1.0	Research and draft CMC statement following meet and confer.
DARR	05/09/2019	AD	1.8	General ECOA research.
DARR	05/09/2019	AD	0.4	Emails re discovery strategy with DV and RG.
DARR	05/09/2019	AD	1.9	Review Order from Court re ADR certification. Plan and prepare for and attend phone call with DV and OC for meet and confer (call 40 mins). Follow up phone call with DV (30 mins). Email correspondence from DV to client and reply.
GALLO	5/10/2019	MVA	0.3	Revise initial disclosures and format production.
GALLO	5/10/2019	DV	2.5	Research and revise draft initial CMC statement following meet and confer.
GALLO	5/10/2019	DV	0.6	Email A. Darr re communicating with potential class rep.
DARR	05/10/2019	AD	0.5	Review draft discovery requests and discuss with DV.
DARR	05/10/2019	AD	0.2	Review draft CMC statement from DV
DARR	05/10/2019	AD	1.8	Discussions with DV and RG re potential additional/substitute class rep and research same.
GALLO	5/11/2019	REG	0.2	Team emails.
GALLO	5/13/2019	REG	0.4	Finalize Chen CMC statement.
GALLO	5/13/2019	DV	0.4	Review and revise draft CMC statement.
GALLO	5/13/2019	DV	0.2	Review and revise draft email to prospective additional class rep.
GALLO	5/13/2019	DV	1.7	Draft discovery requests.

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DARR	05/13/2019	AD	1.6	Draft Email to potential additional/substitute class rep. Discuss with DV and RG via email. Review edited CMC Statement and discuss discovery requests with RG and DV.
DARR	05/13/2019	AD	0.1	Email correspondence with DV and OC re CMC Statement.
DARR	05/14/2019	AD	0.1	Email from OC re CMC Statement Draft.
DARR	05/14/2019	AD	0.1	Email to RG and DV re potential additional/substitute class rep.
GALLO	5/21/2019	REG	0.1	Team discussion re honest belief defense.
GALLO	5/21/2019	DV	1.6	Review and revise CMC statement in light of Defendant's revisions.
DARR	05/21/2019	AD	0.2	Review additional revisions from DV to CMC
DARR	05/21/2019	AD	0.4	Review revised CMC draft from OC.
GALLO	5/22/2019	DV	1.2	Further revisions to CMC statement in response to Chase's revisions.
DARR	05/22/2019	AD	0.5	Review revised CMC Statement from AS and DV. Draft edit and send to DV.
DARR	05/22/2019	AD	0.9	Review draft CMC order and MTD order. Email correspondence to DV and RG regarding CMC content. Review revised CMC statement sent to Defendant.
GALLO	5/23/2019	MVA	1.0	File CMC statement and arrange for courtesy copy delivery; prepare proof of service and serve initial disclosures and update discovery table.
GALLO	5/23/2019	DV	1.8	Review and revise P's draft initial disclosures.
GALLO	5/23/2019	DV	4.2	Draft discovery requests.
GALLO	5/23/2019	DV	0.7	Review OC's proposed further revisions to joint CMC statement.
DARR	05/23/2019	AD	0.3	Review additional CMC edits from Defendant to CMC statement. Email correspondence with DV and OC about filing.
DARR	05/23/2019	AD	0.2	Email correspondence with DV and OC re final CMC statement.
DARR	05/23/2019	AD	1.2	Email from OC with D's discovery. Review same. Request word copy. Circulate to team.
DARR	05/23/2019	AD	1.2	Review P's draft of initial disclosures. Initial disclosures from MVA submitted.
GALLO	5/24/2019	DV	2.5	Review and revise discovery requests; review and outline responses to Chase's discovery requests to Plaintiff; email J. Chen request to gather documents and info for discovery responses.
DARR	05/24/2019	AD	0.2	Email correspondence with DV regarding Initial Disclosures.

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DARR	05/24/2019	AD	1.2	Discuss answer to complaint with DV. Review issues with affirmative defenses. Review relevant case law and rulings from J. Corley.
DARR	05/24/2019	AD	0.4	Review draft discovery responses to D from DV.
DARR	05/24/2019	AD	0.1	Review orders re CMC statement and substitution of counsel.
DARR	05/24/2019	AD	0.5	Review email correspondence and draft discovery responses from DV.
GALLO	5/28/2019	MVA	2.1	Research Chase Bank name change implications and update templates.
DARR	05/28/2019	AD	0.6	Answer to complaint filed. Review same.
GALLO	5/29/2019	DV	1.2	Finalize and serve discovery requests.
GALLO	5/29/2019	DV	1.1	Review answer to complaint and email team re potential motion to strike; email meet and confer letter to OC re same.
DARR	05/29/2019	AD	0.5	Review proposed discovery requests. Send correspondence to DV and RG regarding same. Correspondence to
DARR	05/29/2019	AD	0.2	Meet and confer correspondence between DV, OC, and self re affirmative defenses.
DARR	05/29/2019	AD	0.4	Finish review proposed discovery responses from DV. Email to DV re proposed discovery responses. Email correspondence with DV and RG. Email correspondence with DV.
GALLO	5/30/2019	DV	0.3	Download and format stipulated protective order and send to OC for approval.
GALLO	5/30/2019	DV	4.8	Review steps to address Chase's name change; prep for, travel to and from, and attend CMC; follow-up email to team re same.
GALLO	5/30/2019	MVA	0.6	Prepare protective order.
GALLO	5/30/2019	DV	0.5	Review and revise two-tiered protective order.
DARR	05/30/2019	AD	0.2	Review order re CMC. Discuss CMC conference with DV.
DARR	05/30/2019	AD	0.6	Review draft protective order from DV. Review correspondence from DV to Chase re striking affirmative defenses.
GALLO	5/31/2019	MVA	0.2	Revise protective order comparison.
GALLO	5/31/2019	MVA	0.4	Revise stipulation for electronic service and circulate.
DARR	05/31/2019	AD	0.5	Correspondence from DV re request for documents from client. Draft email to client re same.
DARR	05/31/2019	AD	0.2	Email re protective order to Chase. Review proposed revision.

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DARR	05/31/2019	AD	1.1	Email correspondence with DV and RG re CMC and mediators for case. Research JAMS mediators in area. Discuss mediation discovery with client.
DARR	05/31/2019	AD	0.3	Email with DV and RG re adequacy of class rep.
DARR	05/31/2019	AD	0.2	Email correspondence with DV and RG regarding arbitration with Chase and impact on Chen matter.
DARR	05/31/2019	AD	0.4	Review D's discovery requests. Discuss with DV. Email to client regarding discovery.
DARR	06/04/2019	AD	0.3	Email to client re discovery. Reply emails with client.
DARR	06/04/2019	AD	1.8	Emails with RG re affirmative defense response. Begin drafting motion to strike affirmative defenses.
DARR	06/05/2019	AD	0.2	Email correspondence with client re discovery.
DARR	06/06/2019	AD	0.3	Email from OC with proposed changes to protective order. Review.
DARR	06/06/2019	AD	0.2	Review revised protective order from DV.
GALLO	6/10/2019	DV	0.6	Review Chase's proposed edits to protective order and circulate revised version.
GALLO	6/10/2019	DV	0.1	Email OC request that Chase voluntarily amend its answer to avoid motion to strike.
DARR	06/10/2019	AD	0.2	Emails with client re discovery.
DARR	06/10/2019	AD	0.2	Emails to RG and DV re discovery from client.
DARR	06/10/2019	AD	0.1	Email re aff. ds with DV and OC.
DARR	06/10/2019	AD	0.2	Emails with DV and OC re mediator suggestions.
DARR	06/10/2019	AD	0.3	Review suggestions/revisions from OC on protective order.
GALLO	6/11/2019	REG	0.1	Review mediator selection email.
DARR	06/11/2019	AD	0.2	Email correspondence with client re discovery.
DARR	06/11/2019	AD	1.9	Plan and prepare for and phone call with client re discovery and facts of case. Relay information to RG and DV.
DARR	06/11/2019	AD	0.2	Emails with DV and OC re mediator suggestions.
DARR	06/11/2019	AD	0.2	Email correspondence with OC and DV regarding mediation.
GALLO	6/12/2019	DV	0.8	Review status of discovery; call w/ A. Darr re same.
DARR	06/12/2019	AD	0.4	Email and phone call with DV re discovery requests.
DARR	06/12/2019	AD	0.1	Email with client re discovery materials.
DARR	06/12/2019	AD	1.2	Review discovery from Claimant and email Claimant.
GALLO	6/13/2019	MVA	1.1	Draft stipulation for extension of time to file motion to strike defendant's answer with DV declaration.
GALLO	6/13/2019	DV	1.9	Call w/ A Soukup; prepare stip to extend deadline to respond to answer; discuss case strategy w/ RG.
DARR	06/13/2019	AD	0.1	Review draft stipulation extending deadlines.
DARR	06/13/2019	AD	0.2	Email with DV and phone call (voicemail) re discovery.

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DARR	06/13/2019	AD	0.1	Email correspondence from DV re protective order in case.
DARR	06/13/2019	AD	0.1	Phone call with DV re mediation and phone call with OC.
DARR	06/13/2019	AD	0.1	Review draft stipulation of extension from DV
GALLO	6/14/2019	MVA	0.6	Prepare and file stipulation and proposed order to extend time to file motion to strike with supporting declaration of DV and email copies to judge.
DARR	06/14/2019	AD	0.1	Email from MVA re Stipulation to Extend Dates.
DARR	06/14/2019	AD	0.1	Email correspondence from OC re filing stipulated extension.
DARR	06/14/2019	AD	0.1	Email from client re discovery obligations.
DARR	06/14/2019	AD	0.1	Order on stipulation from Court. File same.
DARR	06/14/2019	AD	0.2	Email correspondence from OC re extension. ECF activity, review same.
GALLO	6/17/2019	DV	0.3	Call w/ A Soukup re potential mediation; email team re same; evaluate Judge W. Brazil as a potential mediator.
DARR	06/17/2019	AD	1.1	Emails with client and DV regarding discovery and discovery deadlines. Begin draft discovery responses for Plaintiff.
DARR	06/17/2019	AD	0.5	Emails with DV, RG, and OC scheduling mediation.
DARR	06/17/2019	AD	0.1	Order from court. File same.
GALLO	6/18/2019	DV	1.3	Discuss potential mediation with team and email OC re mediation schedule and proposed exchange of information.
DARR	06/18/2019	AD	0.3	Review emails from OC re proposed answers to JAMS info request.
GALLO	6/19/2019	REG	0.3	Strategy analysis re mediation.
GALLO	6/19/2019	DV	0.2	Review draft letter brief re mediation and arrange filing.
DARR	06/19/2019	AD	0.2	Emails with DV and OC re ADR letter. Review draft.
GALLO	6/20/2019	MVA	0.1	File letter brief re ADR process.
GALLO	6/20/2019	DV	0.5	Notify J. Chen of mediation; review Judge Brazil's background and mediation publications.
GALLO	6/20/2019	DV	0.2	Respond to client questions about mediation.
DARR	06/20/2019	AD	0.3	Email correspondence from DV to client discussing mediation.
DARR	06/20/2019	AD	0.1	Orders from Court. File Same.
DARR	06/21/2019	AD	0.1	Email correspondence from DV to client discussing mediation.
DARR	06/24/2019	AD	0.1	Email from client re discovery materials.
DARR	06/25/2019	AD	0.1	Email from JAMS.
DARR	06/25/2019	AD	0.1	Email from client re discovery materials.



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GALLO	6/26/2019	MVA	0.1	Prepare mediation engagement for signature.
GALLO	6/26/2019	DV	0.1	Review and approve JAMS mediation agreement.
GALLO	6/26/2019	DV	0.4	Call w/ A Soukup re proposed protective order and mediation.
DARR	06/26/2019	AD	1.2	Email correspondence with DV and RG re mediation strategy and position. Research class size in ECOA context. Present to DV and RG.
DARR	06/26/2019	AD	0.1	Emails from DV and OC to JAMS re engagement agreement.
DARR	06/26/2019	AD	0.1	Review mediation confirmation notice from JAMS. File same.
DARR	06/26/2019	AD	0.2	Email from OC and DV re protective order. Review modifications.
GALLO	6/27/2019	DV	0.8	Review Chase's proposed revisions to proposed protective order and make further revisions.
DARR	06/27/2019	AD	0.2	Email from OC with additional protective order proposed changes. Review same. Responsive email from DV.
GALLO	6/28/2019	DV	0.8	Review Chase's revisions to protective order, make further revisions, and circulate.
DARR	06/28/2019	AD	0.4	Email correspondence and final changes to protective order.
DARR	06/29/2019	AD	0.1	Email from OC re protective order.
GALLO	7/1/2019	MVA	0.4	File stipulated protective order and email department proposed order in word format.
DARR	07/01/2019	AD	0.1	Email with DV re mediation brief and information from Chen.
DARR	07/01/2019	AD	0.1	Order from court re filing protective order. File same.
DARR	07/02/2019	AD	0.1	Order from court on protective order. File same.
DARR	07/02/2019	AD	0.1	Email from JAMS re mediation.
GALLO	7/3/2019	REG	0.3	Review JAMS corresp; strategy analysis.
GALLO	7/3/2019	MVA	0.6	Receive document production; format and organize in client file; order audio recordings of hearings.
GALLO	7/3/2019	DV	1.8	Emails w/ OC re exchange of docs and info for mediation; draft mediation brief.
DARR	07/03/2019	AD	0.1	Order from Court. File same.
DARR	07/03/2019	AD	0.4	Phone call with DV re pre-mediation brief. Outline pre-mediation brief for argument formulation.
DARR	07/03/2019	AD	1.1	Mediation discovery from Chase. Begin Review same.
DARR	07/03/2019	AD	0.4	Emails with DV and client re information to turn over for mediation.
DARR	07/03/2019	AD	0.2	Email from OC regarding mediation exchange of discovery.

<b>FIRM</b>	<b>DATE</b>	<b>STAFF</b>	<b>TIME</b>	<b>DESCRIPTION</b>
DARR	07/03/2019	AD	0.2	Email from JAMS re pre-mediation call. Schedule with DV and OC.
GALLO	7/4/2019	DV	0.2	Discuss Chase's request for info from J. Chen w/ team.
DARR	07/04/2019	AD	0.3	Emails with DV regarding AU usage by client and impact on case.
GALLO	7/5/2019	DV	1.5	Research and draft mediation brief.
GALLO	7/8/2019	DV	2.4	Research and draft mediation brief.
DARR	07/08/2019	AD	0.1	Email from OC re pre-mediation call.
DARR	07/08/2019	AD	0.1	Email from JAMS re mediation brief.
DARR	07/08/2019	AD	1.9	Discovery review. Analysis of Chen's credit card statements for activity that might affect class rep adequacy.
DARR	07/08/2019	AD	1.4	Research and draft subjective/objective/confusion portion of mediation brief.
GALLO	7/9/2019	REG	0.3	Chen discovery management; review statute.
GALLO	7/9/2019	REG	0.3	Analysis re mediation brief.
GALLO	7/9/2019	MVA	0.3	Calculate to date fees and costs.
GALLO	7/9/2019	DV	9.0	Email team re mediation posture; draft mediation brief; review Chase's mediation production.
DARR	07/09/2019	AD	1.4	Listen to Chen recordings of CMC and Motion Argument
DARR	07/09/2019	AD	0.1	Email to DV with mediation brief outline.
DARR	07/09/2019	AD	0.6	Research Chase cardmember agreements for provisions regarding authorized users. Discuss same with DV and RG.
DARR	07/09/2019	AD	0.5	Review draft mediation brief from DV.
DARR	07/09/2019	AD	0.4	Emails to DV and RG re discovery content and mediation strategy and damages.
DARR	07/09/2019	AD	2.8	Finish drafting mediation brief.
DARR	07/09/2019	AD	0.1	Email to client discussing AU and other CC activity.
DARR	07/09/2019	AD	0.7	Plan and prepare for and phone call with client regarding CC usage. Complete discovery review.
DARR	07/09/2019	AD	0.3	Phone call with DV re case and mediation brief.
GALLO	7/10/2019	REG	2.7	Review and revise mediation brief.
GALLO	7/10/2019	MVA	2.2	Review production and make index.
GALLO	7/10/2019	DV	4.7	Review and revise mediation brief.
GALLO	7/10/2019	DV	2.0	Prepare exchange of mediation information requested by Chase.
DARR	07/10/2019	AD	0.1	Email from JAMS re mediation.
DARR	07/10/2019	AD	2.2	Review current draft of mediation brief. Compile additional information for brief. Emails with DV and RG re same.
DARR	07/10/2019	AD	0.3	Review Chase mediation brief.
GALLO	7/11/2019	REG	0.4	Team communications re mediation.

<b>FIRM</b>	<b>DATE</b>	<b>STAFF</b>	<b>TIME</b>	<b>DESCRIPTION</b>
GALLO	7/11/2019	MVA	0.1	Download and format defendant production.
GALLO	7/11/2019	DV	4.0	Revise mediation production letter; review Chase's mediation brief; request production of audio recordings; outline response to chase's brief; outline settlement issues for discussion with team; review
DARR	07/11/2019	AD	0.7	Correspondence with team re Chase mediation brief.
GALLO	7/12/2019	REG	0.3	Manage class communications.
GALLO	7/12/2019	DV	2.4	Assess residency requirements for prospective additional rep; strategy call w/ AD and RG; draft communication to prospective class reps.
GALLO	7/12/2019	DV	2.2	Mediation call; prepare mediation term sheet.
DARR	07/12/2019	AD	1.2	Correspondence with team re class representative. Research and review research re impact of class rep change.
GALLO	7/13/2019	REG	0.1	Team email.
GALLO	7/14/2019	REG	0.1	Team email.
GALLO	7/15/2019	REG	0.3	Team comms.
DARR	07/16/2019	AD	10.2	Travel to and prep for Chen Mediation. Depart Fremont 5:10 PM Tuesday 7/16. Arrive Hotel 4:00 AM Eastern.
GALLO	7/17/2019	REG	0.1	Manage settlement.
GALLO	7/17/2019	DV	10.0	Attend mediation at JAMS SF and related travel.
DARR	07/17/2019	AD	5.9	Return Travel Chen Mediation. General work on Chen matter. (.7 to SFO airport). 4 hour flight return. 1.2 hour drive back. Email correspondence with client re Mediation and Discovery.
DARR	07/17/2019	AD	8.7	Plan and prepare for, travel to, and attend Chen Mediation (8:30AM departure). Chen Mediation Completed 5:15 PM.
DARR	07/19/2019	AD	0.4	Email with DV re substitute class rep. Email correspondence with substitute class rep.
GALLO	7/22/2019	DV	0.2	Email A. Darr re motion to strike.
DARR	07/22/2019	AD	0.7	Email correspondence with DV re motion to strike affirmative defenses. Review materials for same from DV. Email from OC (AS) re amendment of affirmative defenses.
DARR	07/22/2019	AD	0.2	Discuss potential additional/substitute class rep's adequacy with DV. Review applicable case law.
GALLO	7/23/2019	REG	0.1	Team communications re settlement.
GALLO	7/23/2019	DV	0.9	Call w/ A. Soukup, follow-up w/ RG and AD.
DARR	07/23/2019	AD	1.3	Begin drafting discovery responses for client and DV review.
GALLO	7/24/2019	REG	0.1	Team communications re other Chase letters in violation.

<b>FIRM</b>	<b>DATE</b>	<b>STAFF</b>	<b>TIME</b>	<b>DESCRIPTION</b>
GALLO	7/24/2019	REG	0.5	Call with DV and strategic analysis re settlement negotiations.
GALLO	7/24/2019	DV	1.3	Settlement discussions w/ OC and team.
GALLO	7/25/2019	REG	0.1	Team emails.
GALLO	7/25/2019	DV	1.5	Settlement discussions w/ OC and team.
DARR	07/25/2019	AD	0.2	Email correspondence with DV and RG re settlement. Review correspondence sent to AS.
DARR	07/30/2019	AD	0.1	Email to DV and RG re settlement prospects and approaching deadlines.
DARR	07/31/2019	AD	0.1	Email correspondence with DV and AS re settlement and deadlines.
GALLO	8/7/2019	REG	0.1	Manage settlement.
GALLO	8/7/2019	DV	0.1	Email OC and AD re settlement status.
DARR	08/07/2019	AD	0.1	Review settlement status with DV and RG. Email correspondence re same to DV and RG.
DARR	08/08/2019	AD	0.1	Review settlement status with DV and RG. Email correspondence re same to DV, RG, and OC regarding the same.
GALLO	8/9/2019	REG	0.2	Manage settlement.
GALLO	8/9/2019	DV	0.2	Email team and OC re agreement in principle and extension of deadlines.
GALLO	8/12/2019	REG	0.1	Manage settlement.
DARR	08/12/2019	AD	0.3	Review draft of joint notice of settlement. Discuss same with DV and RG.
DARR	08/13/2019	AD	0.1	Review draft of joint notice of settlement revisions from DV. Discuss same with DV and RG.
GALLO	8/15/2019	REG	0.1	Manage settlement.
GALLO	8/15/2019	DV	0.5	Finalize and arrange for filing of stipulation to vacate deadlines.
GALLO	8/15/2019	MVA	0.5	Review and file stipulation and proposed order re settlement and stay and transmit Word version to court and counsel of record.
DARR	08/15/2019	AD	0.2	Review filed stipulation of preliminary settlement and order on same. Email correspondence with client re settlement.
GALLO	8/30/2019	REG	0.1	Manage Settlement
GALLO	9/5/2019	DV	0.4	Email J. Chen and A Soukup re case schedule.
DARR	09/05/2019	AD	0.1	Email with DV, OC, and client re case settlement.
DARR	09/06/2019	AD	0.1	Email with DV, OC, and client re case settlement.
DARR	09/18/2019	AD	2.4	Review draft settlement documents from OC.
GALLO	9/23/2019	DV	3.4	Review and revise Chase's draft settlement agreement and supporting materials.
GALLO	9/24/2019	MVA	1.0	Compile Corley opinions re class settlement and attorney fee applications.

<b>FIRM</b>	<b>DATE</b>	<b>STAFF</b>	<b>TIME</b>	<b>DESCRIPTION</b>
GALLO	9/24/2019	DV	3.5	Review and revise draft settlement agreement.
DARR	09/24/2019	AD	0.1	Email with DV re class settlements from Judge Corley. Review orders.
GALLO	9/25/2019	REG	0.7	Manage revisions to draft settlement agreement
GALLO	9/26/2019	REG	0.1	Strategy analysis with team
GALLO	9/26/2019	DV	2.5	Review RG edits to settlement agreement and make further revisions.
GALLO	9/26/2019	REG	0.3	Manage drafting of settlement agreement
DARR	09/26/2019	AD	0.6	Review draft settlement document revisions from DV and RG.
GALLO	9/27/2019	DV	0.7	Revise and circulate draft settlement agreement.
GALLO	9/27/2019	REG	0.1	Email with team re draft settlement agreement
DARR	09/27/2019	AD	0.3	Finish review draft settlement document revisions from DV and RG. Email re same. Emails to OC re documents.
GALLO	10/2/2019	MVA	0.2	Download preliminary approval orders in Moreno and Schuchardt.
GALLO	10/3/2019	REG	0.2	Email regarding CMC statement
GALLO	10/3/2019	MVA	0.8	Draft state court CMC statement and attempt CourtCall appearance scheduling for DV.
GALLO	10/3/2019	DV	0.2	Review state court CMC statement deadline and ask MVA to draft.
GALLO	10/3/2019	DV	0.5	Review and revise draft state court CMC statement.
DARR	10/03/2019	AD	0.1	Emails with DV and OC re state CMC order.
GALLO	10/4/2019	DV	0.2	Email state court request to continue CMC.
DARR	10/04/2019	AD	0.1	Emails with DV and OC re state CMC order.
GALLO	10/7/2019	MVA	1.0	Prepare state court proof of service and serve and file CMC statement.
GALLO	10/7/2019	DV	0.4	Finalize and arrange filing of state court CMC statement.
DARR	10/07/2019	AD	0.5	Emails with DV and OC re state CMC order and review same as filed. Review new round settlement revisions from OC.
GALLO	10/8/2019	DV	2.2	Review OC's revisions to settlement agreement and make further revisions.
DARR	10/08/2019	AD	0.9	Emails with DV and OC re state CMC order. Review new round settlement revisions from OC. Circulate revisions/comments. Review same from RG and DV.
GALLO	10/9/2019	REG	0.2	Email re client communications
GALLO	10/9/2019	DV	0.3	Call w/ RG and exchange emails w/ A. Darr re negotiation of settlement agreement terms.
DARR	10/09/2019	AD	0.8	Emails with DV and RG re new round settlement revisions. Additional revisions and circulate.

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GALLO	10/10/2019	REG	3.7	Review, analysis, and revision of settlement agreement.
GALLO	10/10/2019	DV	0.4	Review and revise settlement agreement following RG revisions.
DARR	10/10/2019	AD	1.1	Phone call with DV re method of notice for Chen Settlement. Review revised notice forms. Emails with DV and OC re same. Work on file.
DARR	10/10/2019	AD	0.5	Review email and settlement agreement revisions from RG, make additional revisions.
GALLO	10/11/2019	REG	0.5	Revisions and strategy analysis re settlement agreement; communications with team re same.
GALLO	10/11/2019	DV	1.4	Review and revise settlement agreement and circulate to OC.
DARR	10/11/2019	AD	0.4	Review settlement agreement revisions from RG, make additional revisions. Circulate and email with RG and DV. Emails with DV with final revisions.
GALLO	10/15/2019	MVA	0.4	Contact state court to approve telephonic appearance at CMC; check state court website and update calendar.
GALLO	10/15/2019	DV	1.2	Draft motion for preliminary approval.
GALLO	10/16/2019	DV	0.8	Draft motion for preliminary approval.
GALLO	10/17/2019	DV	0.8	Draft motion for preliminary approval.
GALLO	10/18/2019	DV	4.0	Draft motion for preliminary approval.
GALLO	10/18/2019	DV	1.5	Call w/ OC re terms of settlement agreement; summarize call for internal discussion.
GALLO	10/18/2019	REG	0.1	Review opt-out letter draft
GALLO	10/18/2019	REG	0.1	Review evidence required for claim in settlement.
DARR	10/18/2019	AD	1.9	Phone call re settlement revisions with OC and DV. Plan and prepare for same (review ethics opinions). Review summary email of same. Email correspondence with client re accounts with Chase.
GALLO	10/21/2019	DV	0.2	Call w/ RG re settlement terms.
GALLO	10/21/2019	DV	0.3	Call w/ A Darr re potential cases.
GALLO	10/21/2019	REG	0.3	Manage settlement
GALLO	10/21/2019	REG	0.6	Phone Call w DV re settlement negotiations
DARR	10/21/2019	AD	0.2	Emails with RG and DV re settlement revisions.
GALLO	10/22/2019	DV	5.3	Draft motion for preliminary approval.
GALLO	10/23/2019	DV	5.0	Draft motion for preliminary approval.
DARR	10/23/2019	AD	0.3	Emails with DV and client re releases.
GALLO	10/24/2019	DV	6.0	Draft motion for preliminary approval.
GALLO	10/25/2019	DV	1.6	Draft preliminary approval motion.
GALLO	10/28/2019	DV	3.5	Draft motion for preliminary approval.
GALLO	10/29/2019	DV	4.6	Draft motion for preliminary approval.

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GALLO	10/29/2019	DV	0.8	Draft stipulation and declaration requesting additional time to file prelim approval motion.
GALLO	10/30/2019	REG	0.1	Phone Call w DV re Settlement agreement
GALLO	10/30/2019	REG	0.2	Email re settlement drafts
GALLO	10/30/2019	DV	5.2	Review Chase's revisions to settlement agreement and make further revisions and comments; research ethical limitations on confidentiality provisions; revise class notice.
DARR	10/30/2019	AD	2.7	Review revisions from OC on settlement. Emails with RG and DV re settlement revisions. Additional emails. Research limitations on practice (Ethics Rule 5.6) as applicable to settlement agreements. Email DV and RG re same. Emails between counsel and KCC re settlement administration.
GALLO	10/31/2019	REG	0.1	Email re settlement negotiations
GALLO	10/31/2019	REG	0.1	Email re settlement negotiations
GALLO	10/31/2019	REG	0.1	Manage settlement negotiations
GALLO	10/31/2019	MVA	0.6	Prepare documents, serve and file stipulation, and email proposed order to chambers.
GALLO	10/31/2019	DV	0.2	Review, revise and arrange filing of stip extending time to file prelim approval motion.
GALLO	10/31/2019	DV	0.6	Revise settlement agreement and send back to OC.
GALLO	10/31/2019	DV	2.4	Revise class notice.
GALLO	10/31/2019	DV	1.3	Draft motion for preliminary approval.
DARR	10/31/2019	AD	1.1	Additional email discussions with RG and DV re settlement revisions. Review revisions from DV. Emails with client re revisions and client representations in settlement agreement. Review filings with Court. Review class notices (exhibits to settlement agreement), revise, and discuss with DV.
GALLO	11/1/2019	DV	2.3	Review and revise motion for preliminary approval.
DARR	11/01/2019	AD	1.1	Review case filing.
GALLO	11/2/2019	REG	0.1	Review settlement drafting
GALLO	11/5/2019	DV	1.1	Draft motion for preliminary approval; revise proposed final and preliminary approval orders.
GALLO	11/7/2019	DV	0.1	Email OC request to promptly respond to revisions.
DARR	11/07/2019	AD	0.3	Review revisions to settlement admin bid submitted by KCC via email.
GALLO	11/8/2019	DV	1.1	Review and revise motion for preliminary approval.
GALLO	11/8/2019	DV	0.2	Review settlement agreement and email team re Chase's edits.
GALLO	11/11/2019	DV	4.0	Review Chase's revisions to settlement agreement; revise settlement agreement and supporting documents and send back to OC.

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GALLO	11/13/2019	DV	1.4	Review and revise motion for preliminary approval.
GALLO	11/14/2019	DV	3.9	Draft preliminary approval motion.
DARR	11/14/2019	AD	0.2	Emails with KCC re bid adjustment due to class size adjustment and other information required from KCC.
GALLO	11/15/2019	REG	0.2	Manage settlement process
GALLO	11/15/2019	MVA	0.3	Summarize case fees and costs for DV.
GALLO	11/15/2019	DV	3.3	Draft motion for preliminary approval.
GALLO	11/18/2019	REG	0.1	Revise settlement agreement
GALLO	11/18/2019	REG	0.1	Settlement discussion
GALLO	11/18/2019	MVA	1.2	Prepare table of authorities for motion for preliminary approval of class settlement.
GALLO	11/18/2019	DV	4.4	Review and revise settlement agreement exhibits following OC's revisions; review and revise motion for preliminary approval.
DARR	11/18/2019	AD	1.6	Phone call with DV re lead counsel contact for Chen settlement. Review revised notice forms. Work on file.
GALLO	11/19/2019	REG	0.1	Manage preliminary approval motion
GALLO	11/19/2019	REG	0.1	Discussion re preliminary approval.
GALLO	11/19/2019	MVA	0.1	Prepare notice of change of firm address.
GALLO	11/19/2019	DV	5.7	Review OC's revisions to settlement agreement; prepare declaration in support of preliminary approval; review and revise motion for preliminary approval.
DARR	11/19/2019	AD	0.2	Email correspondence with OC and DV re available settlement administrators for the class. Review correspondence with KCC re administration.
GALLO	11/20/2019	REG	0.1	Email re settlement
GALLO	11/20/2019	REG	0.1	Manage settlement process
GALLO	11/20/2019	REG	0.3	Manage settlement process
GALLO	11/20/2019	DV	2.9	Review and revise motion for preliminary approval and supporting materials.
DARR	11/20/2019	AD	0.3	Email correspondence with OC and DV and RG re available settlement administrators for the class. Review updated KCC bid for administration. and follow up/correction emails for same.
GALLO	11/21/2019	REG	0.1	Manage settlement
GALLO	11/21/2019	DV	3.1	Finalize settlement agreement and circulate for signature; revise motion for preliminary approval and supporting declaration.



<b>FIRM</b>	<b>DATE</b>	<b>STAFF</b>	<b>TIME</b>	<b>DESCRIPTION</b>
DARR	11/21/2019	AD	0.7	Email correspondence with legal team and KCC re bid for administration and follow up/correction emails for same. Final review of revised settlement materials and email correspondence with DV and OC regarding the same. Email correspondence with legal team and client for execution.
GALLO	11/22/2019	MVA	0.9	File motion for preliminary approval of class settlement and arrange chambers copy delivery and email proposed order to judge.
GALLO	11/22/2019	DV	4.2	Finalize motion for preliminary approval and arrange filing.
DARR	11/22/2019	AD	0.2	Review and file correspondence from Ct re Preliminary Approval and final documents for the same. Email correspondence with legal team and client for execution. Email correspondence with OC re final execution of revised settlement.
DARR	11/25/2019	AD	0.1	Review order from Court re adjusted deadlines for Preliminary Approval. Email correspondence with KCC and OC re CAFA and beginning of administration.
GALLO	12/2/2019	MVA	0.3	Update ECF attorney records and file notice of change of address.
DARR	12/05/2019	AD	0.1	Email correspondence with client and DV re progress of preliminary approval.
GALLO	12/11/2019	DV	1.0	Prepare for preliminary approval hearing.
GALLO	12/12/2019	DV	3.5	Travel to and attend preliminary approval hearing in SF; email team and OC re issues the Court asked the parties to address.
DARR	12/12/2019	AD	0.2	Review of Minute Entry from Court re Preliminary Approval. Email correspondence with DV, legal team, and OC re the same and ways to address Court concerns.
DARR	12/13/2019	AD	0.1	Review correspondence from ECF for matter.
GALLO	12/16/2019	DV	0.3	Emails w/ OC re steps to obtain additional bids from potential settlement administrators
DARR	12/16/2019	AD	0.3	Review correspondence from OC to legal team regarding addressing concerns raised by Court. Email correspondence from OC to potential administrators re submitting class settlement admin bid. Correspondence from potential administrator regarding administration of settlement.
GALLO	12/17/2019	DV	0.4	Call and email w/ KCC to obtain lower bids for settlement administration and report to OC.

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DARR	12/17/2019	AD	0.3	Email from Court re transcript for matter. Email correspondence from DV re KCC administration costs. Email correspondence with legal team re strategy and other administration options to reduce costs. Email correspondence from potential claims administrator.
GALLO	12/18/2019	DV	0.5	Review Chase's proposed revisions to settlement agreement and notice and make further revisions.
DARR	12/18/2019	AD	1.3	Email correspondence with legal team re strategy and other administration options to reduce costs. Review revised settlement documents and discuss contents with legal team. Email correspondence with potential claims administrator re bid submission.
GALLO	12/19/2019	DV	0.4	Review and revise class notice and send to OC.
DARR	12/19/2019	AD	0.2	Review team revisions to settlement documents.
DARR	12/20/2019	AD	0.2	Email correspondence re matter with DV and OC. Review of adjusted settlement administration bid from KCC.
GALLO	12/23/2019	DV	1.5	Draft status report re settlement; revise and file same.
DARR	12/23/2019	AD	0.7	Email correspondence with OC re alternative class settlement administrators and status update to be filed with Court. Review status update and revisions from OC. Correspondence from Order from Court granting extension. Review ankura administration bid and email correspondence re same with OC and legal team.
GALLO	12/26/2019	DV	0.2	Request settlement administration bids from ILYM and Simpluris.
DARR	12/26/2019	AD	0.1	Correspondence with potential claims administrator and response correspondence from administrator.
DARR	12/27/2019	AD	0.1	Email correspondence with legal team re ankura bid and additional bids for settlement administration.
VALERIAN	1/3/2020	DV	0.4	Email and call w/ OC re updated administration bids and potential next steps; email team re same.
DARR	01/03/2020	AD	0.1	Email from DV re final analysis and discussion of claims administration bids and alternative administration options.
DARR	01/07/2020	AD	0.2	Simpluris bid review. Email correspondence with OC and legal team re same.
DARR	01/08/2020	AD	0.1	Email correspondence with OC re simpluris bid and eligibility for claim administration with Chase.
VALERIAN	1/9/2020	DV	0.4	Call OC re administration bids; get additional info from KCC for discussion w/ OC.
DARR	01/09/2020	AD	0.1	Email correspondence with OC re simpluris bid and eligibility for claim administration with Chase.

<b>FIRM</b>	<b>DATE</b>	<b>STAFF</b>	<b>TIME</b>	<b>DESCRIPTION</b>
VALERIAN	1/10/2020	DV	0.9	Review and approve updated KCC bid; finalize amended settlement and circulate for signature.
VALERIAN	1/10/2020	DV	1.5	Draft declaration in support of amended settlement agreement.
DARR	01/10/2020	AD	0.2	Review settlement document revisions and declaration in support of amended settlement agreement. Email correspondence with OC re revised KCC bid and simpluris bid. Email with OC re final documents for amended motion for preliminary approval.
DARR	01/11/2020	AD	0.2	Emails with OC re declaration for amended motion.
VALERIAN	1/13/2020	DV	1.0	Collect settlement agreement signatures; finalize and file declaration in support of settlement.
DARR	01/13/2020	AD	0.4	Emails for and execution of final amended settlement agreement. Contact client to discuss same.
DARR	01/14/2020	AD	0.1	Review Valerian dec re Amended Settlement.
VALERIAN	1/16/2020	DV	0.8	Update settlement administrator and client re amended settlement agreement and preliminary approval.
DARR	01/16/2020	AD	0.2	Review order from Court Granting Preliminary Approval Motion. Email correspondence with KCC re bid acceptance. Correspondence with client re same.
DARR	01/17/2020	AD	0.1	Correspondence with KCC re claims administration.
VALERIAN	1/21/2020	DV	0.2	Update settlement schedule.
DARR	01/21/2020	AD	0.1	Correspondence with KCC re claims administration.
VALERIAN	1/22/2020	DV	0.3	Email team re settlement timeline and preparation of fees motion and final approval motion.
DARR	01/22/2020	AD	0.1	Emails with legal team regarding outstanding tasks for final approval.
VALERIAN	1/23/2020	DV	1.8	Draft motion for attorneys' fees.
DARR	01/23/2020	AD	0.1	Correspondence with KCC re claims administration.
DARR	01/24/2020	AD	0.1	Correspondence from OC including class member list. Review same.
VALERIAN	1/27/2020	DV	0.9	Review and respond to KCC email re settlement administration.
DARR	01/27/2020	AD	0.4	Correspondence with legal team re class member list. Correspondence from KCC re applicable deadlines. Discussion of same with legal team and OC. Research available URLs
VALERIAN	1/28/2020	DV	0.2	Review and respond to KCC email re settlement administration.
DARR	01/28/2020	AD	0.2	Client correspondence regarding future steps in matter. Additional correspondence with KCC and OC re deadlines and URL selection.
VALERIAN	1/29/2020	DV	1.5	Draft motion for attorneys' fees.
VALERIAN	1/30/2020	DV	1.9	Draft motion for attorneys' fees.

<b>FIRM</b>	<b>DATE</b>	<b>STAFF</b>	<b>TIME</b>	<b>DESCRIPTION</b>
VALERIAN	2/3/2020	DV	1.4	Draft motion for attorneys' fees.
VALERIAN	2/4/2020	DV	1.8	Draft motion for attorneys' fees.
VALERIAN	2/5/2020	DV	1.4	Draft motion for attorneys' fees.
VALERIAN	2/7/2020	DV	1.2	Review formatted notice and claim forms from KCC and provide feedback; respond to KCC inquiries re class data issues and website buildout.
VALERIAN	2/10/2020	DV	0.1	Call w/ A. Soukup re data issues raised by KCC.
VALERIAN	2/11/2020	DV	0.5	Email KCC re data issues.
VALERIAN	2/13/2020	DV	0.1	Email OC re KCC request for additional data.
VALERIAN	2/18/2020	DV	1.0	Review revised notice documents and claim forms from KCC.
VALERIAN	2/18/2020	DV	1.1	Draft motion for attorneys' fees.
VALERIAN	2/18/2020	DV	2.7	Draft motion for attorneys' fees.
VALERIAN	2/20/2020	DV	4.6	Draft motion for attorneys' fees.
VALERIAN	2/21/2020	DV	3.0	Draft motion for attorneys' fees.
VALERIAN	2/24/2020	DV	0.3	Review and approve updated notice documents from KCC.
VALERIAN	2/24/2020	DV	0.9	Review KCC's preview of settlement website and provide feedback.
VALERIAN	2/27/2020	DV	0.7	Draft motion for attorneys' fees.
VALERIAN	2/27/2020	DV	0.4	Draft motion for attorneys' fees.
VALERIAN	2/27/2020	DV	2.2	Draft final approval motion.
VALERIAN	2/28/2020	DV	0.3	Draft final approval motion.
VALERIAN	2/28/2020	DV	0.6	Draft final approval motion.
VALERIAN	2/28/2020	DV	1.0	Draft final approval motion.
VALERIAN	3/2/2020	DV	1.2	Draft final approval motion.
VALERIAN	3/2/2020	DV	0.3	Draft final approval motion.
VALERIAN	3/2/2020	DV	2.0	Draft final approval motion.
VALERIAN	3/2/2020	DV	0.7	Draft final approval motion.
VALERIAN	3/3/2020	DV	3.5	Draft final approval motion.
VALERIAN	3/4/2020	DV	1.8	Draft motion for attorneys' fees.
VALERIAN	3/5/2020	DV	1.0	Draft motion for attorneys' fees.
VALERIAN	3/9/2020	DV	0.3	Review KCC status report and follow-up email.

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510.50

# EXHIBIT 2

DATE	FIRM	DESCRIPTION	AMOUNT
2/4/2019	GALLO	One Legal invoice 11627436	\$502.50
2/11/2019	GALLO	One Legal invoice 11643535	\$172.50
2/28/2019	GALLO	Postage	\$2.65
3/19/2019	DARR	CaseText Invoice	\$89.00
3/20/2019	DARR	Pro Hac Vice Invoice	\$310.00
3/31/2019	GALLO	Westlaw research charges	\$100.24
4/2/2019	GALLO	First Legal Network invoice 20113896	\$28.75
4/8/2019	DARR	Pacer.gov	\$7.80
4/19/2019	DARR	CaseText Invoice	\$89.00
4/30/2019	GALLO	Westlaw research charges	\$57.19
4/30/2019	GALLO	Pacer.gov research charges.	\$4.30
5/31/2019	GALLO	Westlaw research charges	\$132.52
6/3/2019	GALLO	Travel and parking expense court hearing	\$11.40
6/6/2019	GALLO	First Legal inv20121265 courtesy copy delivery	\$21.00
6/28/2019	GALLO	JAMS Mediation deposit inv4857262	\$3,500.00
6/30/2019	GALLO	Westlaw research charges	\$44.95
7/5/2019	GALLO	JAMS mediation admin fee	\$450.00
7/8/2019	DARR	Pacer.gov	\$3.10
7/11/2019	DARR	Mediation Travel Flight	\$1,459.80
7/12/2019	DARR	Mediation Prep Printing Costs (111 pages)	\$8.60
7/15/2019	DARR	Mediation Lodging Cost	\$160.80
7/16/2019	DARR	Mileage Mediation	\$104.40
7/17/2019	DARR	SFO Airport to Lodging	\$31.38
7/17/2019	DARR	Mediation to SFO Airport	\$39.26
7/17/2019	DARR	CLE Parking Mediation	\$30.00
8/23/2019	GALLO	Westlaw research charges	\$55.03
8/23/2019	GALLO	Westlaw research charges	\$267.72
8/23/2019	GALLO	Postage	\$2.35
8/31/2019	GALLO	Westlaw research charges	\$4.41
9/3/2019	GALLO	Travel expense for mediation	\$12.40
9/30/2019	GALLO	Westlaw research charges	\$176.14
9/30/2019	GALLO	Westlaw research charges	\$3.75
10/31/2019	GALLO	Postage for service.	\$1.00
10/31/2019	GALLO	Westlaw research charges	\$281.59
11/18/2019	GALLO	FirstLegal inv20134954 state court filing, courtesy copies	\$108.42
11/30/2019	GALLO	Westlaw research charges	\$188.26
12/6/2019	GALLO	FirstLegal inv20139959 courtesy copies	\$57.50
12/31/2019	GALLO	Westlaw research charges	\$6.36
		<b>Total</b>	<b>\$8,526.07</b>
		<b>DARR Total</b>	<b>\$2,333.14</b>
		<b>GALLO Total</b>	<b>\$6,192.93</b>