

Exhibit 1

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*Attorneys for Plaintiffs and proposed
Collective and Class Members*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

DEBRA WOLF, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

THE PERMANENTE MEDICAL GROUP,
INC., a California corporation.

Defendant.

Case No. 3:17-cv-05345-VC

**DECLARATION OF JASON J.
THOMPSON IN SUPPORT OF
PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES,
LITIGATION/SETTLEMENT
ADMINISTRATION EXPENSES, AND
CLASS REPRESENTATIVE SERVICE
AWARDS**

1 **DECLARATION OF JASON J. THOMPSON**

2 After being duly sworn, I Jason J. Thompson hereby state:

3 1. I have been involved in this case from the beginning and I have personal knowledge
4 of the events and facts described herein. I am over the age of 21, and could, if called to testify,
5 attest to the events and facts described below.

6 2. I make this declaration in support of Plaintiff's Motion for Attorneys' Fees,
7 Litigation/Settlement Administration Expenses, and Class Representative Service Awards.

8 **A. Practice Background**

9 3. I, along with my partner Kevin Stoops, am the lead attorney for the Named Plaintiff
10 Debra Wolf, opt-in Plaintiff Natty Medrano and class members in this action and I am personally
11 familiar with, and have personal knowledge of, the files and records of this case.

12 4. I received my JD degree, *cum laude*, from Michigan State University in May of
13 1992. I have practiced law in the State of Michigan. In addition to Michigan, I am admitted to
14 practice in the following courts: United States Supreme Court; Sixth Circuit Court of Appeals;
15 U.S. District Court for the Eastern District of Michigan; U.S. District Court for the Western District
16 of Michigan; and U.S. District Court for the District of Maryland. I have appeared *pro hac vice* in
17 numerous U.S. District Courts across the country including, but not limited to, the following:
18 Northern District of Alabama; Central District of California; Northern District of California;
19 Southern District of California; District of Colorado; Northern District of Georgia; Northern
20 District of Illinois; Southern District of Illinois; Western District of Kentucky; Western District of
21 Louisiana; District of Massachusetts; District of Minnesota; Southern District of Mississippi;
22 Northern District Missouri; Western District of Missouri; District of Nevada; Southern District of
23 New York; Western District of North Carolina; Northern District of Ohio; Eastern District of
24 Tennessee-Knoxville; Southern District of West Virginia; Western District of Washington.

25 5. I am a Senior Shareholder in the law firm of Sommers Schwartz, P.C. in Southfield,
26 Michigan, and have worked for the firm since 2008. I have served on the Firm's Board of Directors
27 since 2012.

1 6. I am a Senior Shareholder in the law firm of Sommers Schwartz, P.C. in Southfield,
2 Michigan, and have worked for the firm since 2008. I have served on the Firm's Board of Directors
3 since 2012.

4 7. Founded over 40 years ago, Sommers Schwartz is one of the preeminent contingent
5 fee law firms in the Midwest, if not the country. The firm's primary practice areas include:
6 employment litigation; commercial litigation; class action litigation; medical malpractice litigation
7 and personal injury litigation. The firm has been lead counsel and/or held positions of substantial
8 responsibility on steering committees in lawsuits concerning antitrust violations, mass torts,
9 defective products, dangerous drugs, wage and hour violations, and numerous other types of cases
10 against large corporations. The firm's shareholders are experienced trial attorneys, with active
11 cases pending in both state and federal courts throughout the country.

12 8. Since obtaining my law license in 1992, I have litigated actions spanning the
13 following practice areas: Class Action; Personal Injury, Employment; and Commercial Law &
14 Intellectual Property. Representative cases from these practice areas include the following:

- 15 ▪ \$6.55 million collective action settlement on behalf of exotic dancers working at a
16 Deja Vu gentleman's club that misclassified them as independent contractors,
17 forced them to "rent," and failed to pay minimum wage
- 18 ▪ Over \$16 million in client settlements for women injured by defective transvaginal
19 mesh products
- 20 ▪ \$680,000 class action settlement involving restaurant employees who alleged they
21 were forced to tip-out to ineligible employees and also cheated out of minimum
22 wage
- 23 ▪ \$3.0 million class action settlement involving restaurant employees who alleged
24 they were cheated out of minimum wage and overtime pay
- 25 ▪ \$3 million class action settlement on behalf of hourly employees at Bloomin'
26 Brands, Inc. for violation of the Fair Labor Standards Act in failing to pay their
27 employees all earned wages.
- 28 ▪ \$3.5 million class action settlement on behalf of home-based customer service
 agents who claimed their employer unlawfully withheld compensation in violation
 of the Fair Labor Standards Act's wage and hour provisions

- 1 ▪ \$22.5 million recovered for class of insurance policyholders in 38 states whose
2 covered property damage claims were previously underpaid
- 3 ▪ \$7.5 million settlement in nationwide wage and hour collective action involving
4 more than 12,000 call center employees who were not paid for their pre-shift
5 computer login and boot-up time.
- 6 ▪ \$4.5 million settlement in nationwide wage and hour class action involving more
7 than 20,000 at-home call center employees who were not paid for their pre-shift
8 computer login and boot-up time and for time spent working “off-the-clock” while
9 experiencing system downtime.
- 10 ▪ \$1.1 million settlement in nationwide wage and hour class action involving more
11 than 1,000 at-home call center employees who were not paid for their pre-shift
12 computer login and boot-up time and for time spent working “off-the-clock” while
13 experiencing system downtime.
- 14 ▪ \$940,000 settlement wage and hour collective action settlement in a nationwide
15 lawsuit against Sykes Enterprises, Inc. by approximately 4,000 call center
16 employees who were not paid for their pre-shift computer login and boot-up time
- 17 ▪ Wage and hour collective action settlement for \$1.4 million involving call center
18 employees. Alleged violations included logging into and out of software programs
19 which resulted in unpaid overtime compensation.
- 20 ▪ \$11.3 million collective action settlement on behalf of exotic dancers working at a
21 Déjà Vu gentleman's club who were not paid a minimum wage as required under
22 the Fair Labor Standards Act (FLSA). Instead, the dancers were misclassified as
23 independent contractors and were forced to pay the clubs rent out of the dance fees
24 paid by customers.

18 9. I have been appointed to leadership positions in a variety of complex litigation

19 matter:

- 20 ▪ Owens et al. v. GLH Capital Enterprise, Inc.
- 21 ▪ Lambert et al. v. Dollar General Corp. (Class Counsel)
- 22 ▪ Parrot et al. v. Family Dollar, Inc. (Class Counsel)
- 23 ▪ Lambert et al. v. General Nutrition Corp. (Class Counsel)
- 24 ▪ Gullage et al. v. Cognosanto, LLC (Class Counsel)
- 25 ▪ Jane Doe et al. v. Deja Vu et al. (Class Counsel)
- 26 ▪ Wengerd et. al. v. Self-Reliance, Inc. (Class Counsel)
- 27 ▪ Compressor Engineering Corp. vs. Thomas (Class Counsel)
- 28 ▪ Lee v. Asurion Insurance Services et al. (Class Counsel)
- Gaffers v. Kelly Services, Inc. (Class Counsel)
- In Re: Blue Cross Blue Shield Antitrust Litigation MDL No. 2406 (Damages PSC
Committee Member)
- Bourne v. Ansara Restaurant Group et al. (Class Counsel)

- 1 ▪ APB Associates v. Bronco’s Saloon, Inc. et al. (Class Counsel)
- 2 ▪ Compressor Engineering Corporation v. Manufacturers Financial Corporation, et
- 3 al. (Class Counsel)
- 4 ▪ Machesney v. Lar-Bev of Howell, Inc., et al. (Class Counsel)
- 5 ▪ Alderoty v. Maxim Healthcare Services (Class Counsel)
- 6 ▪ Atkinson v. TeleTech, LLC (Class Counsel)
- 7 ▪ Avio, Inc. v. Alfocchino, Inc. et al. (Class Counsel)
- 8 ▪ Wright v. Jacob Transportation Services, LLC et al. (Class Counsel)
- 9 ▪ Klein v. Secura Insurance Co. (Class Counsel)
- 10 ▪ Wilson v. Maxim Healthcare Services (Class Counsel)
- 11 ▪ Cardoza v. Bloomin’ Brands Inc. et al. (Class Counsel)
- 12 ▪ Matthews v. Convergys Corp. et al. (Class Counsel)
- 13 ▪ Ingram v. Passmore Towing & Recovery (Class Counsel)
- 14 ▪ Terry v. TMX Finance LLC et al. (Class Counsel)
- 15 ▪ Ross v Jack Rabbit Services, LLC, et al. (Class Counsel)
- 16 ▪ Lawrence v. Maxim Healthcare Services (Class Counsel)
- 17 ▪ Stelmachers v. Maxim Healthcare Services (Class Counsel)
- 18 ▪ Williams vs. Sykes Enterprises, Inc. (Class Counsel)
- 19 ▪ Flores vs. Velocity Express, Inc. (Class Counsel)
- 20 ▪ Jimenez et al vs. Allstate Insurance Company et al (Class Counsel)
- 21 ▪ Automotive Wire Harness Systems Antitrust Litigation MDL No 2311 (Direct
- 22 Purchaser PSC)
- 23 ▪ Jackson's Five Star Catering, Inc. v John R. Beason d/b/a Tax Connection World &
- 24 Tax Connection Worldwide LLC (Class Counsel)
- 25 ▪ Exclusively Veterinary Cats Hospital, P.C. v Anesthetic Vaporizer Services, Inc.
- 26 (Class Counsel)
- 27 ▪ Northstar Education Finance, Inc. Contract Litigation MDL No. 1990 (Executive
- 28 Committee)
- Stanley vs. United States Steel Corporation (Class Counsel)
- Amgen Off Label Marketing Litigation MDL No 1934 (Executive Committee)
- In Re: Neurontin Sales and Marketing MDL No. 1629 (Purchase Claims
- Committee)
- In Re: Vioxx Sales and Marketing MDL No. 1657 (Purchase Claims Committee)
- In Re: Bextra/Celebrex Sales and Marketing MDL No. 1699 (Purchase Claims
- Committee)
- In Re: Tricor (TPP Allocation Counsel)
- In Re: Zyprexa MDL No. 1596 (Purchase Claims Committee)
- Haase vs. Frank J. Bluestein, et al. (PSLRA Counsel)
- Regina vs. Comcast of Detroit, Inc. (Class Counsel)
- Snow v Atofina Chemical Inc. (Class Counsel)

10. I have been a member of numerous legal organizations throughout my career and have served in leadership roles in multiple legal organizations including State Bar of Michigan; The National Trial Lawyers; Million Dollar Advocates Forum; American Association for Justice

1 - Wage & Hour Litigation Group (Former Co-Chair); Class Action Litigation Group, Section on
2 Toxic Environmental and Pharmaceutical Torts, Employment Rights Section; Michigan
3 Association for Justice - Former Executive Committee Member; and American Arbitration
4 Association –Arbitrator, Class Action and Employment Panels..

5 11. Sommers Schwartz (along with Outten & Golden, LLP) is Class Counsel in this
6 case, filed on behalf of current and former “Teleservice Representatives” (“TSRs”) employed by
7 Defendant, The Permanente Medical Group, Inc. (“Defendant”), remotely and at its brick-and-
8 mortar call centers in San Jose, Vallejo and Sacramento, California.

9 **B. Work Performed in Connection with this Lawsuit**

10 12. I have been involved in this litigation from the outset and have been responsible for
11 coordinating and directing the efforts of all attorneys who performed services on behalf of the
12 Named Plaintiffs and the putative class since this case was commenced.

13 13. In addition to myself, the following individuals have performed services in
14 connection with this lawsuit: Kevin Stoops (Sommers Schwartz Senior Shareholder); Lance
15 Young (Sommers Schwartz Senior Shareholder and managing partner of the Firm’s complex
16 litigation department (which includes the firm’s wage & hour practice)); Charles R. Ash, IV
17 (Sommers Schwartz Associate); Veronica Stewart (Sommers Schwartz Paralegal); Aimee York
18 (Sommers Schwartz Paralegal); Jahan Sagafi (Outten & Golden Shareholder); Danica Li (Outten
19 & Golden Associate).

20 **C. Reasonableness of Requested Attorneys’ Fees**

21 14. In preparing this declaration, I reviewed the time records of all participating
22 attorneys/paralegals from the Sommers Schwartz and Outten & Golden law firms, confirming that
23 the accuracy, utility, efficiencies and reasonableness of the amount of time spent by Class Counsel
24 working on this litigation, and expenses incurred by those law firms.

25 15. I typically charge \$685 per hour for my legal services in FLSA and state wage law
26 class action cases. I am familiar with rates customarily charged in the legal market for FLSA and
27 state wage law class action litigation. The rates charged by my firm for my services and those of
28

1 Senior Shareholders, Shareholders, Associates and Paralegals are, on the whole, lower than
2 prevailing rates charged for equivalent services by attorneys of similar skill, experience, and
3 reputation. Therefore, I believe that we are reasonable in seeking lodestar rates of \$685 per hour
4 for myself and Lance Young (Senior Shareholders), \$580 per hour for Kevin Stoops (Senior
5 Shareholder), \$350 per hour for Charles R. Ash, IV (Shareholders), and \$175 per hour for Veronica
6 Stewart and Aimee York (Paralegals).

7 16. I am also familiar with rates customarily charged in California and the San
8 Francisco legal market for FLSA and state wage law class action litigation. The rates charged by
9 Outten & Golden are consistent with, or lower than, prevailing rates charged for equivalent
10 services by attorneys of similar skill, experience, and reputation. Therefore, I believe that we are
11 justified in seeking lodestar rates of \$850 per hour for Mr. Jahan Sagafi and lower rates for
12 Associates and Paralegals from his Firm who worked on this matter.

13 17. I have reviewed all of the time and expenses and can attest that they are reasonable
14 as to both the hourly rate, time spent, work allocation and totals, as well as being absolutely
15 necessary to reach the settlement in this case. Class Counsel diligently worked to avoid duplication
16 of efforts and expenses, while at the same time not sacrificing work quality on behalf of the class.
17 The settlement obtained in this litigation were directly affected by the efforts and expenses
18 advanced by Class Counsel in this lawsuit.

19 18. Sommers Schwartz, P.C.'s hours by working attorney and paralegal are identified
20 in the attached charts (Tab A).

21 19. Charts identifying the time spent working on the different categories of work
22 required to reach this settlement, and by the staff or attorneys performing those services, are
23 attached at Tab C. The categories of work are modeled on the American Bar Associations codes
24 for ease of understanding.

25 20. The charts depict in graphic form the amount of time spent on the file by each
26 attorney and provide for an easy visual comparison of the type of work performed by each person.
27 As the Court can see, there was an intentional effort made by Class Counsel to ensure the proper
28

1 persons were assigned to the proper task. Staff work was performed by staff members; associate
2 level work by associate attorneys; and higher level partner work was performed by the partners.

3 21. Class Counsel has attached the charts to specifically assist the Court in its effort to
4 perform a loadstar cross check, determine whether the time records and billing entries are
5 reasonable, and decide if the requested 3.0 multiplier is warranted.

6 22. As of July 5, 2018, Class Counsel (Sommers Schwartz, P.C., and Outten & Golden
7 LLP) have expended approximately 368 hours on this matter. Class Counsel's total lodestar for
8 these hours amounts to \$176,633.50 (\$148,086– Sommers Schwartz, P.C.; \$28,547.50 – Outten &
9 Golden LLP).

10 23. Based on my personal experience, the requested 25% attorneys' fee (equal to
11 \$737,500) reflects the reasonable value of those services in light of the nature of the case, the result
12 obtained, the quality of representation, the risks of the litigation, the customary fee, and other
13 applicable considerations as set forth by the law.

14 24. In fact, my Firm has received fee awards in excess of 25% in numerous wage and
15 hour cases. A few examples include the following: *Matthews v. Convergys*, W.D. N.C., Case No.
16 1:14-cv-00125 (33 1/3% attorneys' fee award of \$1,500,000 in connection with \$4,500,000 FLSA
17 and state law wage and hour collective/class action. Attorneys' fee award represented a multiplier
18 of approximately 2.7); *Tarrant v. Sutherland*, W.D. N.Y., Case No. 6:15-cv-00320 (31.3%
19 attorneys' fee award of \$336,666.67 in connection with \$1,075,000 FLSA and state law wage and
20 hour collective/class action. Attorneys' fee award represented a multiplier of approximately 2.2).

21 25. Further, Sommers Schwartz, P.C., typically enters into 40% contingent fee retainer
22 agreements with clients in connection with employment litigation matters including wage and hour
23 actions.

24 26. The Named Plaintiff and opt-in Plaintiff in this action retained Sommers Schwartz,
25 P.C., pursuant to a 40% contingent fee agreement.

26 27. Class Counsel undertook to prosecute this action without any assurance of payment
27 for their services, litigating the case on a wholly contingent basis in the face of significant risk.

1 Class and collective wage and hour cases of this type are, by their very nature, complicated and
2 time-consuming. Any lawyer undertaking representation of large numbers of affected employees
3 in wage and hour actions inevitably must be prepared to make a tremendous investment of time,
4 energy and resources. Due also to the contingent nature of the customary fee arrangement, lawyers
5 are asked to be prepared to make this investment with the very real possibility of an unsuccessful
6 outcome and no fee of any kind. Class Counsel stood to gain nothing in the event the case was
7 unsuccessful.

8 28. Class Counsel takes on difficult cases like this one because we believe that they are
9 important. We take seriously our responsibility to push the law in a direction favorable for
10 employees. We continue to do so despite, unfortunately, having suffered several major (and very
11 expensive) losses in wage and hour cases over the years. Like this case, we believed that each of
12 these cases was meritorious and socially useful but understood the risks. For example, for the past
13 4 years Sommers Schwartz, P.C., has litigated the companionship exemption issue in several home
14 healthcare aid cases, and lost approximately \$1,000,000 in lodestar.

15 29. To date, Class has worked without compensation of any kind, and the fee has been
16 wholly contingent upon the result achieved.

17 30. In my experience, administering class settlements of this nature and size requires a
18 substantial and ongoing commitment. Class Counsel will continue to invest time and incur
19 litigation expenses for the next several months as Class Counsel communicates with Class
20 Members and the settlement administrator concerning the settlement, prepares for an attends the
21 Final Approval hearing, and monitors the implementation of the settlement. Thus, the final lodestar
22 and litigation expenses will be higher – potentially significantly higher – than the current amounts
23 reported in this declaration. Class Counsel will provided updated lodestar and litigation expenses
24 at the time of the Final Approval hearing.

25 31. Based on my experience, it is anticipated that at the conclusion of this case
26 (including additional work to be performed at the Final Approval stage, and extensive work related
27 to settlement administration and Class Member payment processing), that Class Counsel will have
28

1 incur additional lodestar in a range of \$50,000 to \$75,000 (or more). Based on this estimate, I
2 anticipate that Class Counsel's 25% attorneys' fee request will result in a multiplier of 3.0 or less.

3 32. In my opinion, and based on my experience in, and research of, other FLSA and
4 state wage law class action settlements in this District and nationwide, the requested fee will be
5 reasonable and appropriate, especially in light of the amount of work performed by Class Counsel
6 in this case and the substantial recovery obtained on behalf of the Class.

7 **D. Reasonableness of Requested Named Plaintiff Class Representative Service Awards**

8 33. The Parties' Settlement Agreement identifies Class Representative service awards
9 in the total amount of \$10,000 (\$7,500 for Named Plaintiff Wolf and \$2,500 for opt-in Plaintiff
10 Medrano). The Named Plaintiff and opt-in Plaintiff worked diligently to assist Class Counsel in
11 their activities during the pendency of this litigation. In particular, both the Named Plaintiff and
12 opt-in Plaintiff took part in multiple interviews and meetings and provided numerous records and
13 materials to Class Counsel. In total, I would estimate that the Named Plaintiff and opt-in Plaintiff
14 have spent 25 to 50 hours in connection with this litigation. The Named Plaintiff was counseled
15 on the rights and responsibilities of serving as Rule 23 class representatives, and agreed to serve
16 in that capacity in the filing of Plaintiff's Complaint.

17 34. The requested total amount of \$10,000 (\$7,500 for Named Plaintiff Wolf and
18 \$2,500 for opt-in Plaintiff Medrano) is commensurate with other service awards I have been
19 involved in nationally and, as documented by research of other similar awards, is reasonable under
20 the circumstances.

21 35. Further, the Class Representative service awards reflect that both the Named
22 Plaintiff and opt-in Plaintiff executed a "general release" in connection with the settlement. Half
23 of the service award designated the Named Plaintiff and opt-in Plaintiff was attributed the their
24 execution of the general release that includes broader release language than that covering the other
25 Class Members.

1 **E. Reasonableness of Requested Litigation and Settlement Administration Expenses**

2 36. Settlement administration services are being performed by professional services
3 provider Simpluris, Inc.

4 37. Simpluris, Inc., has worked hand-in-hand with counsel for the Parties since the
5 Court's May 9, 2018 Preliminary Approval Order. Among other things, Simpluris Inc., has
6 conducted the following tasks to date: 1) issued settlement notice on June 8, 2018; 2) administered
7 returned mail notice packets to insure that the applicable Class Members receive notice; 3)
8 administered opt-out and dispute forms; and 4) provided counsel for the Parties with weekly
9 reporting concerning settlement notice, opt-out forms, and dispute forms.

10 38. Simpluris, Inc., issued the settlement notice to 1,701 Class Members. To this date,
11 none of the Class Members have filed objections and 7 Class Members have filed opt-out forms
12 excluding themselves from the litigation (Class Members that do not opt-out will automatically
13 receive a check without having to file a claim form).

14 39. Estimates provided by Simpluris, Inc., indicate that settlement administration for
15 this case will not exceed \$35,000. A final amount will be submitted to the Court in connection
16 with Class Counsel's Final Approval briefing.

17 40. Based on my experience in cases with similar class sizes and settlement
18 mechanisms, it is my belief and understanding that settlement administration expenses of \$35,000
19 in this case are completely reasonable and should be allowed by the Court.

20 41. Pursuant to the Parties' Settlement Agreement Class Counsel is seeking
21 reimbursement of reasonable and necessary litigation costs not to exceed \$40,000.

22 42. I have personally reviewed the records of litigation expenses incurred in this matter
23 by Sommers Schwartz, P.C. According to those records, to date, Sommers Schwartz, P.C., has
24 incurred litigation expenses in the amount of \$30,332.93. The litigation expenses can be broken
25 down as follows:

<u>Expense</u>	<u>Amount</u>
Photocopy and Printing	\$158.20
Online Research	\$4.36
Expert Services / Fees	\$9,580.50
Facilitation	\$11,750.00
Filing fees	\$930.00
CA Bar Fees	\$292.95
Outside courier	\$118.22
Postage	\$1.38
Travel & Lodging	\$7,497.32
Expense Totals	<u><u>\$30,332.93</u></u>

43. Sommers Schwartz, P.C., has not yet received any reimbursement for any of the monies expended to cover the litigation expenses listed above.

44. The records identifying the litigation expenses are available for submission to the Court upon request, and a final amount will be submitted to the Court in connection with Class Counsel's Final Approval briefing. All the expenses were reviewed by me and are reasonable, necessary, and customary for FLSA and California wage statute cases. They were all incurred in the normal course of litigation, directly benefited the Class Members, and added to the overall success of this case.

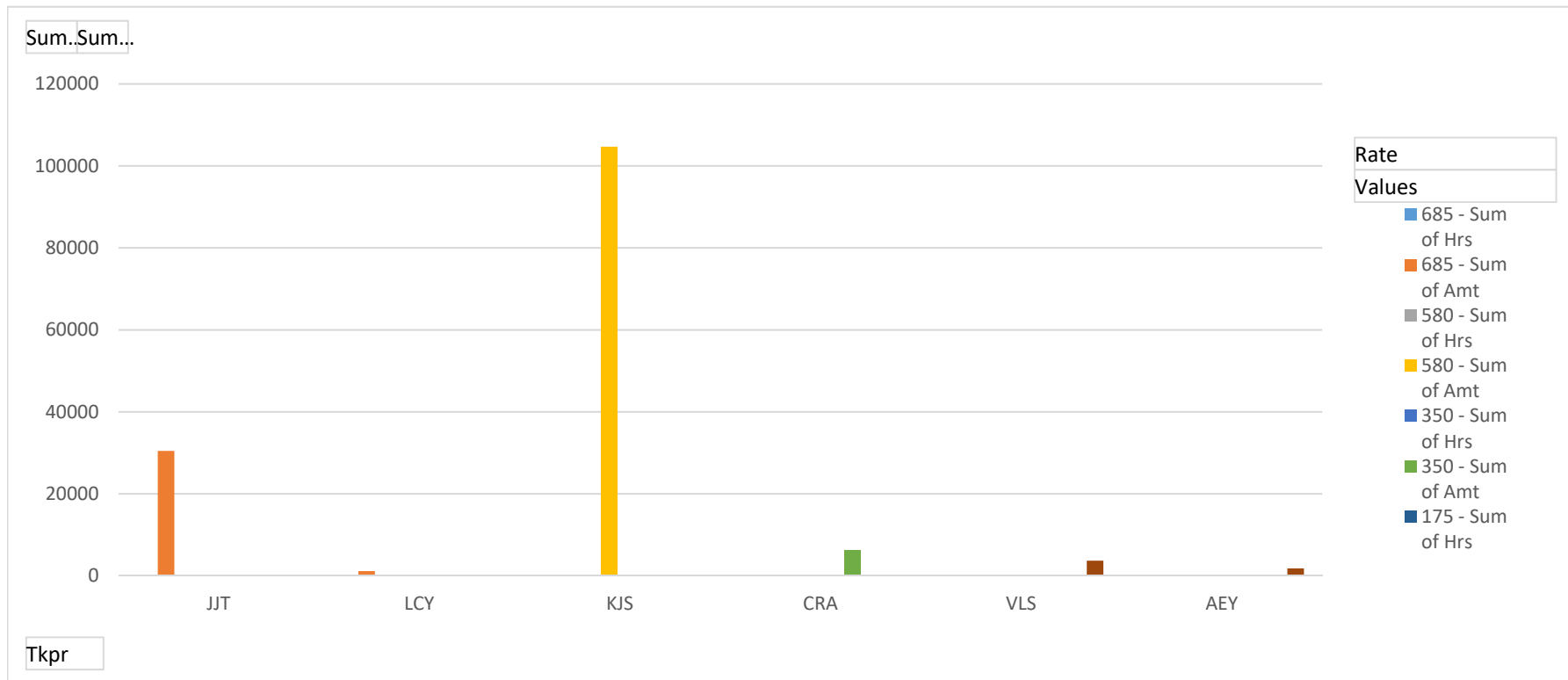
I declare, under penalty of perjury, under the laws of the State of Michigan that the foregoing is true and correct. Executed this 3rd day of July, 2018 at Southfield, Michigan.

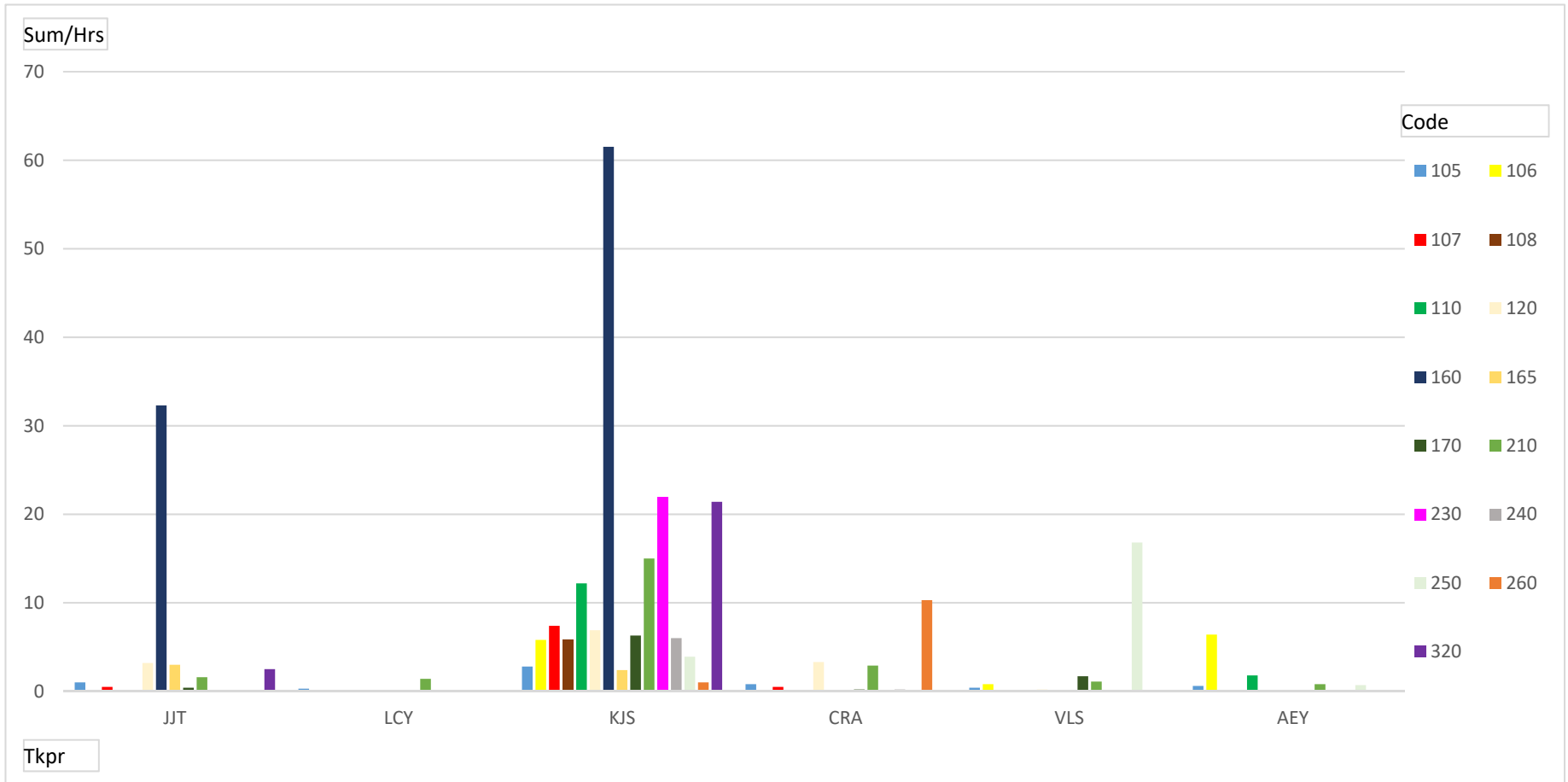
/s/ Jason J. Thompson
Jason J. Thompson

Tab A

TOTAL HOURS

	Hourly Rates									
	\$685.00		\$580		\$350		\$175		Total Sum of Hrs	Total Sum of Amt
Tkpr	Sum of Hrs	Sum of Amt	Sum of Hrs	Sum of Amt	Sum of Hrs	Sum of Amt	Sum of Hrs	Sum of Amt		
JJT	44.5	\$30,482.50							44.5	\$30,482.50
LCY	1.7	\$1,164.50							1.7	\$1,164.50
KJS			180.3	\$104,574.00					180.3	\$104,574.00
CRA					18.2	\$6,370.00			18.2	\$6,370.00
VLS							21.1	\$3,692.50	21.1	\$3,692.50
AEY							10.3	\$1,802.50	10.3	\$1,802.50
Grand Total	46.2	\$31,647.00	180.3	\$104,574.00	18.2	\$6,370.00	31.4	\$5,495.00	276.1	\$148,086.00





Code Legend

Communication

- 105 - in firm
- 106 - client
- 107 - opp counsel
- 108 - external

Investigation

- 110 - fact investigation
- 120 - Analysis/strategy
- 140 - document / file mgt

Settlement / ADR

- 160 - Mediation
- 165 - Research
- 170 - Settlement

Pleadings & Motions

- 210 - pldgs
- 230 - ct mandated conf
- 250 - other written mtns
- 260 - Cond Cert

Discovery

- 310 - written discovery
- 320 - doc prod
- 330 - deps

	COMMUNICATION					INVESTIGATION		ADR /SETTLEMENT			PLGS, CONFS & MTNS				COND.CERT	DISC.
Sum/Hrs	Codes															
Tkpr	105	106	107	108	110	120	160	165	170	210	230	240	250	260	320	TotalS
JJT	1		0.5			3.2	32.3	3	0.4	1.6					2.5	44.5
LCY	0.3									1.4						1.7
KJS	2.8	5.8	7.4	5.8	12.2	6.9	61.5	2.4	6.3	15	21.9	6	3.9	1	21.4	180.3
CRA	0.8		0.5			3.3			0.2	2.9		0.2		10.3		18.2
VLS	0.4	0.8	0.1			0.2			1.7	1.1			16.8			21.1
AEY	0.6	6.4			1.8					0.8			0.7			10.3
Totals	5.9	13	8.5	5.8	14	13.6	93.8	5.4	8.6	22.8	21.9	6.2	21.4	11.3	23.9	276.1

Code Legend

Communication

105 - in firm
106 - client
107 - opp counsel
108 - external

Investigation

110 - fact investigation
120 - Analysis/strategy
140 - document / file mgt

Settlement / ADR

160 - Mediation
165 - Research
170 - Settlement

Pleadings & Motions

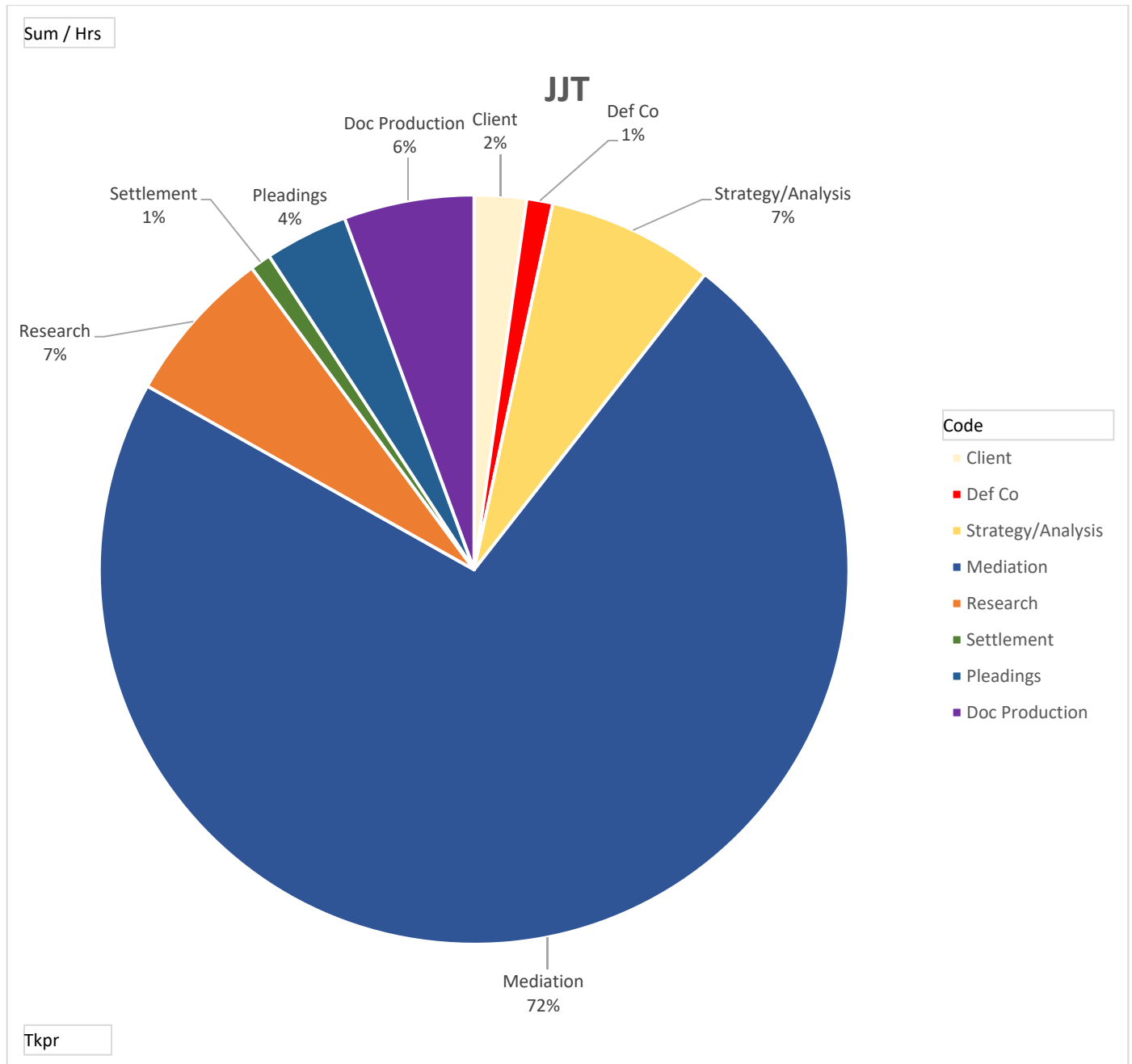
210 - pldgs
230 - ct mandated conf
250 - other written mtns
260 - Cond Cert

Discovery

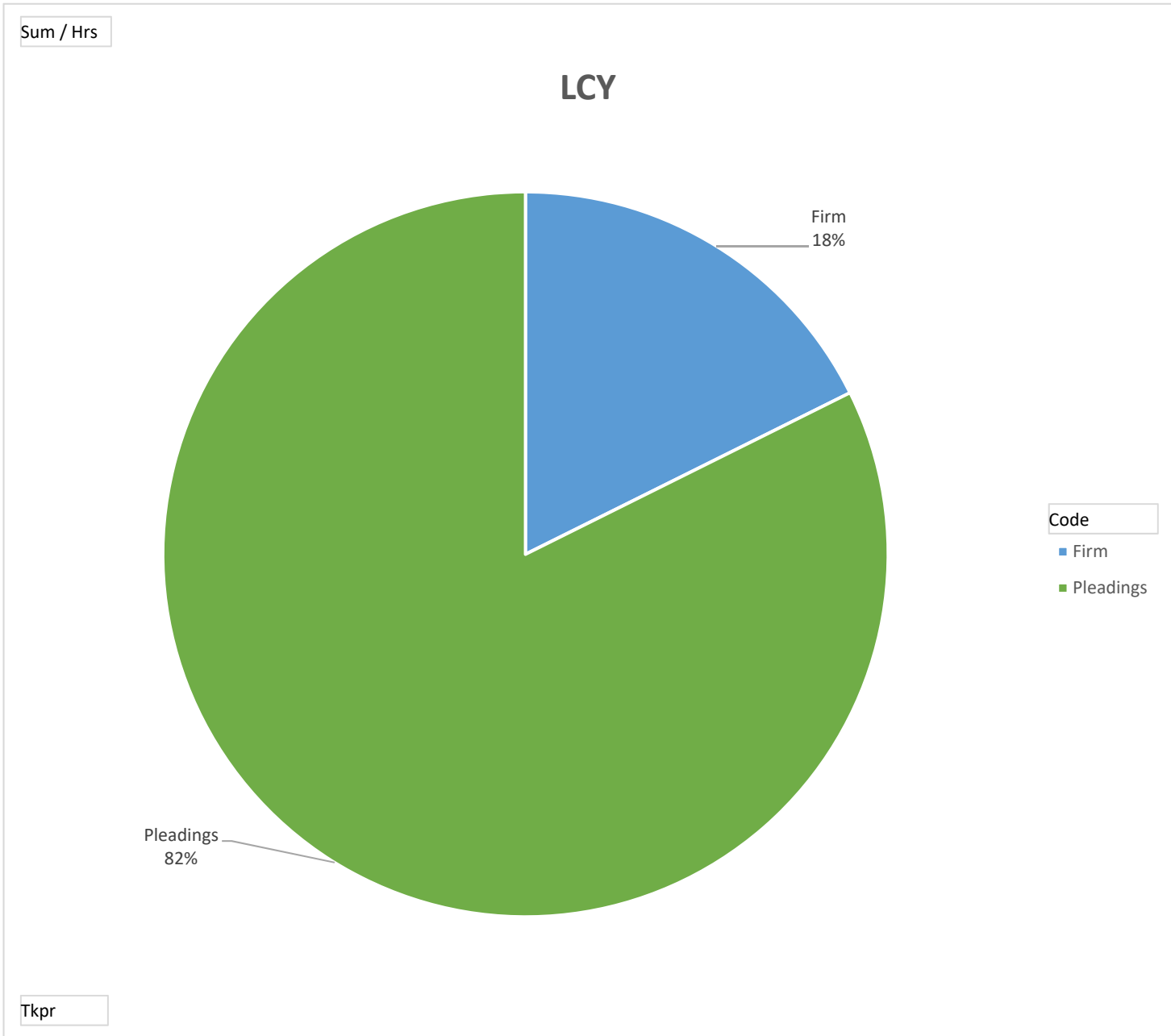
310 - written discovery
320 - doc prod
330 - deps

Tab B

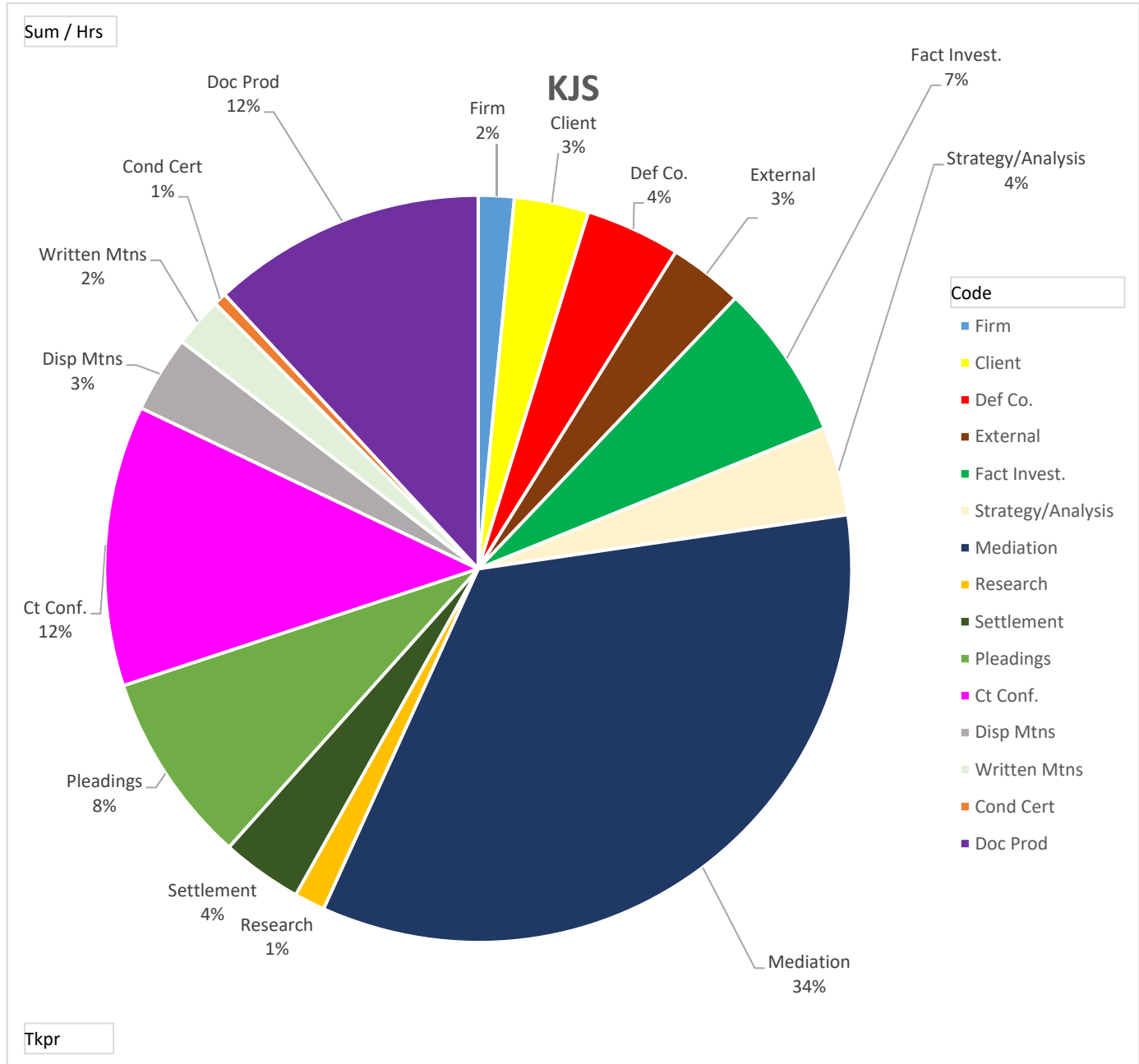
Sum / Hrs		
Code	JJT	Totals
Client	1	1
Def Co	0.5	0.5
Strategy/Analysis	3.2	3.2
Mediation	32.3	32.3
Research	3	3
Settlement	0.4	0.4
Pleadings	1.6	1.6
Doc Production	2.5	2.5
Totals	44.5	44.5



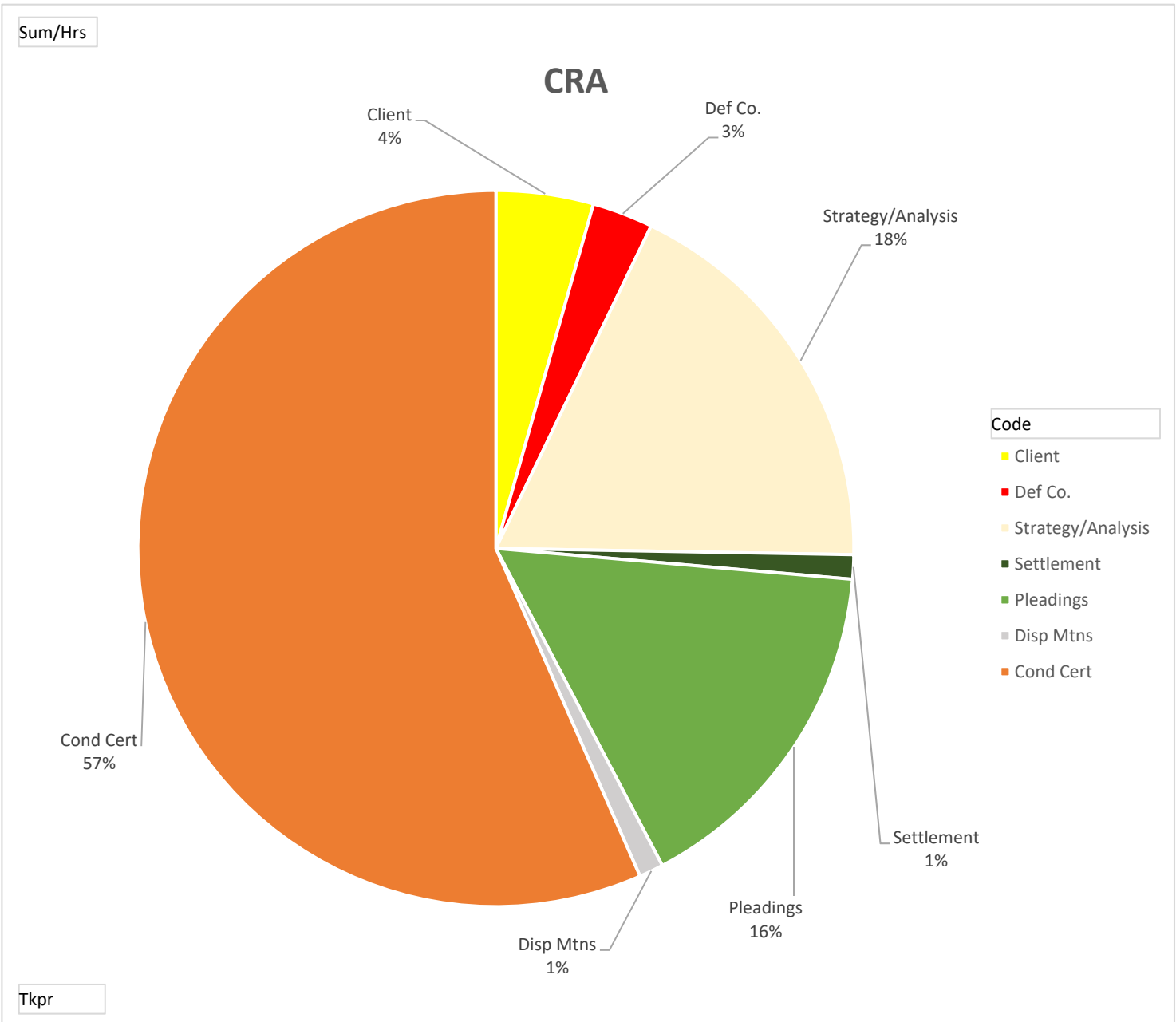
Sum / Hrs		
Code	LCY	Totals
Firm	0.3	0.3
Pleadings	1.4	1.4
Totals	1.7	1.7



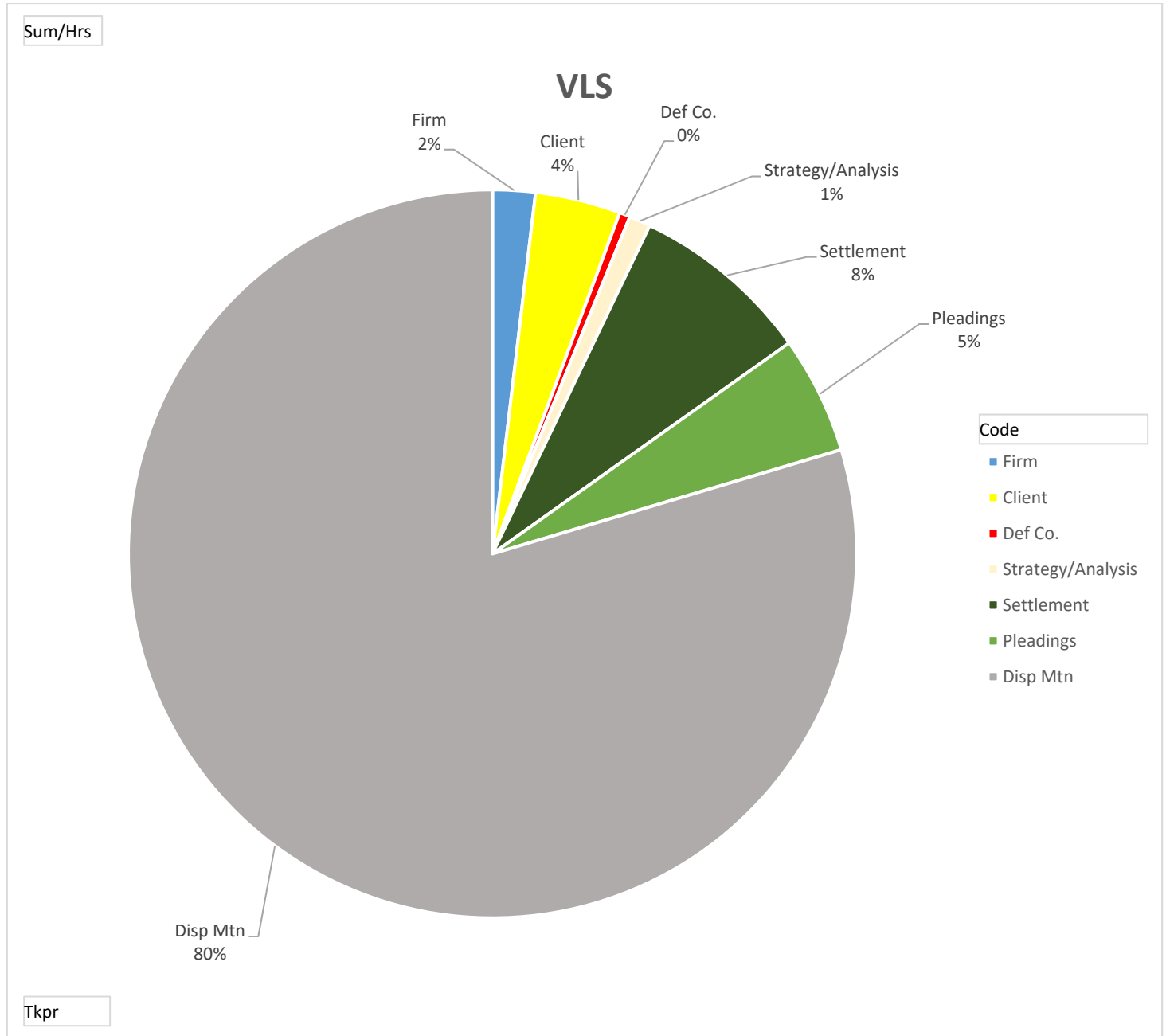
Sum / Hrs		
Code	KJS	Totals
Firm	2.8	2.8
Client	5.8	5.8
Def Co.	7.4	7.4
External	5.8	5.8
Fact Invest.	12.2	12.2
Strategy/Analysis	6.9	6.9
Mediation	61.5	61.5
Research	2.4	2.4
Settlement	6.3	6.3
Pleadings	15	15
Ct Conf.	21.9	21.9
Disp Mtns	6	6
Written Mtns	3.9	3.9
Cond Cert	1	1
Doc Prod	21.4	21.4
Totals	180.3	180.3



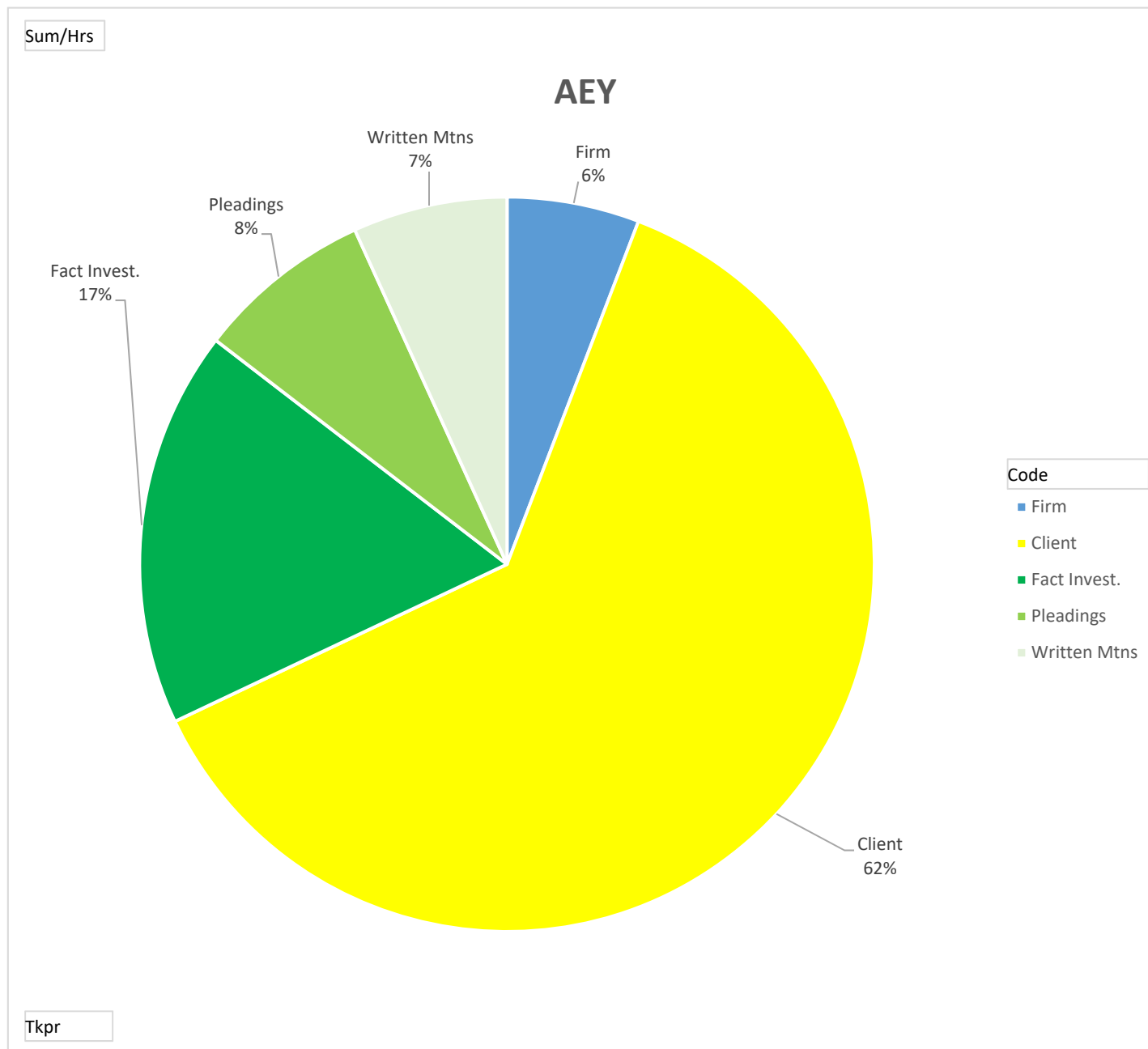
Sum/Hrs		
Code	CRA	Totals
Client	0.8	0.8
Def Co.	0.5	0.5
Strategy/Analysis	3.3	3.3
Settlement	0.2	0.2
Pleadings	2.9	2.9
Disp Mtns	0.2	0.2
Cond Cert	10.3	10.3
Totals	18.2	18.2



Code	594 Totals	
Firm	0.4	0.4
Client	0.8	0.8
Def Co.	0.1	0.1
Strategy/Analysis	0.2	0.2
Settlement	1.7	1.7
Pleadings	1.1	1.1
Disp Mtn	16.8	16.8
Totals	21.1	21.1

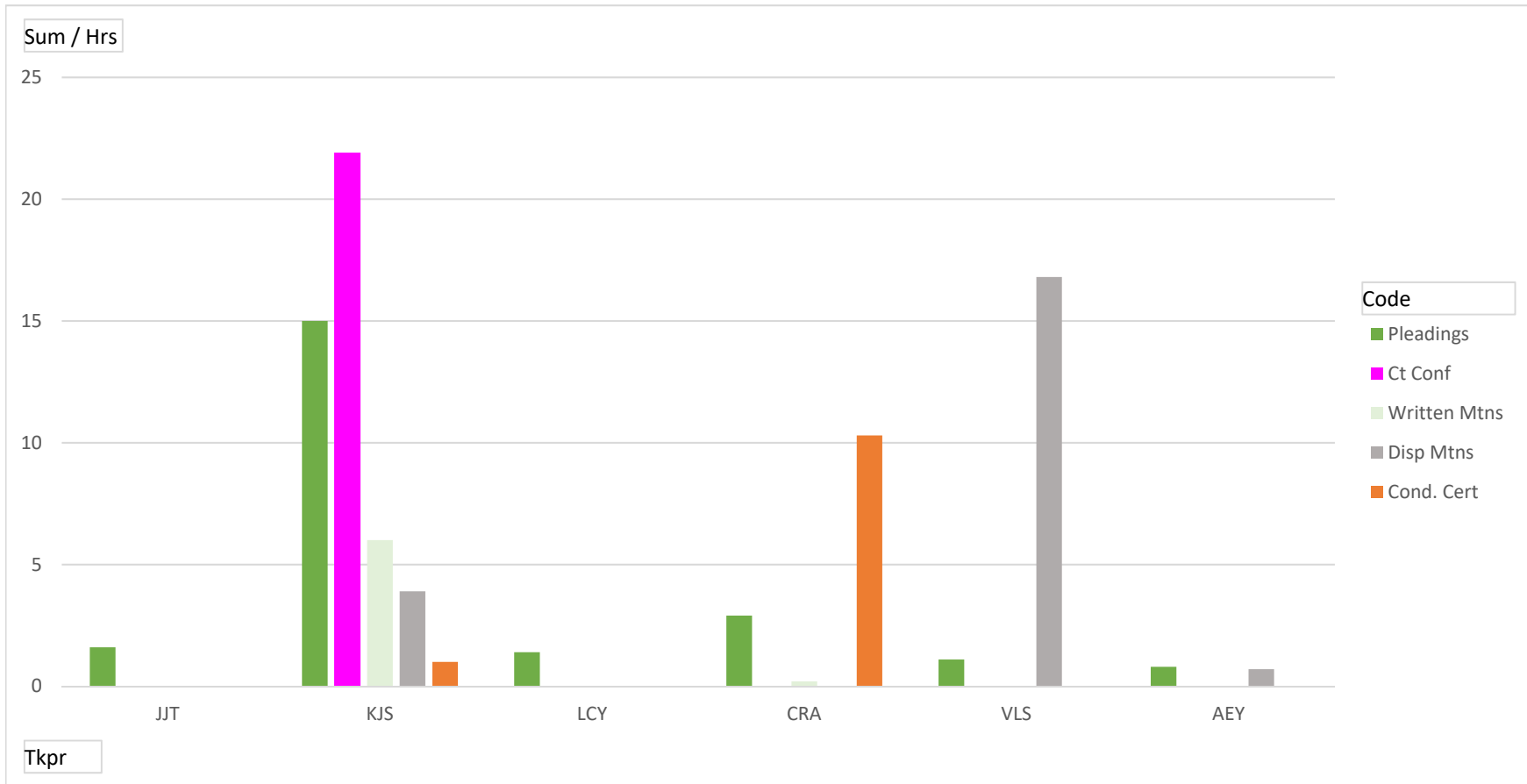


Sum/Hrs		
Code	AEY	Totals
Firm	0.6	0.6
Client	6.4	6.4
Fact Invest.	1.8	1.8
Pleadings	0.8	0.8
Written Mtns	0.7	0.7
Totals	10.3	10.3

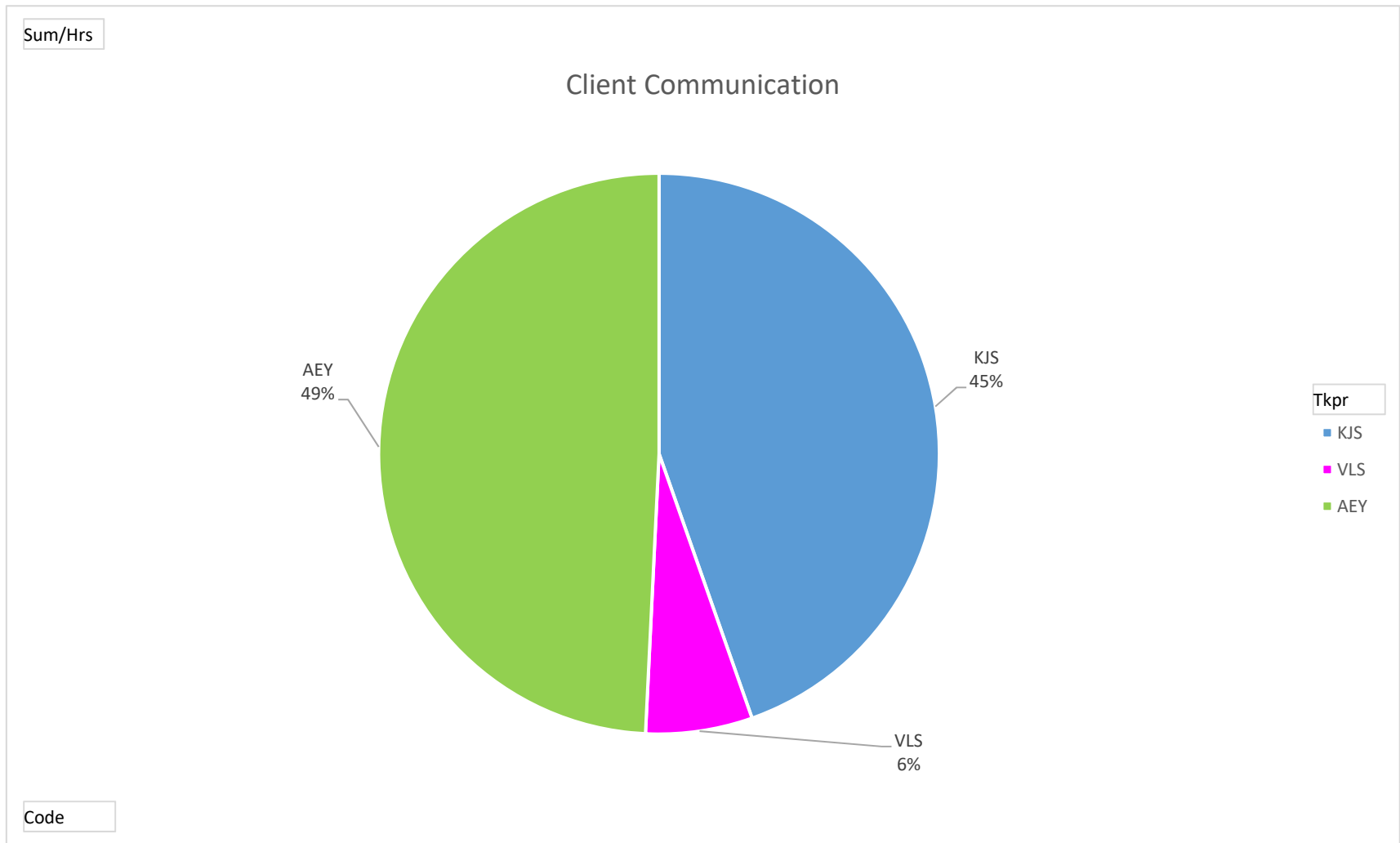


Tab C

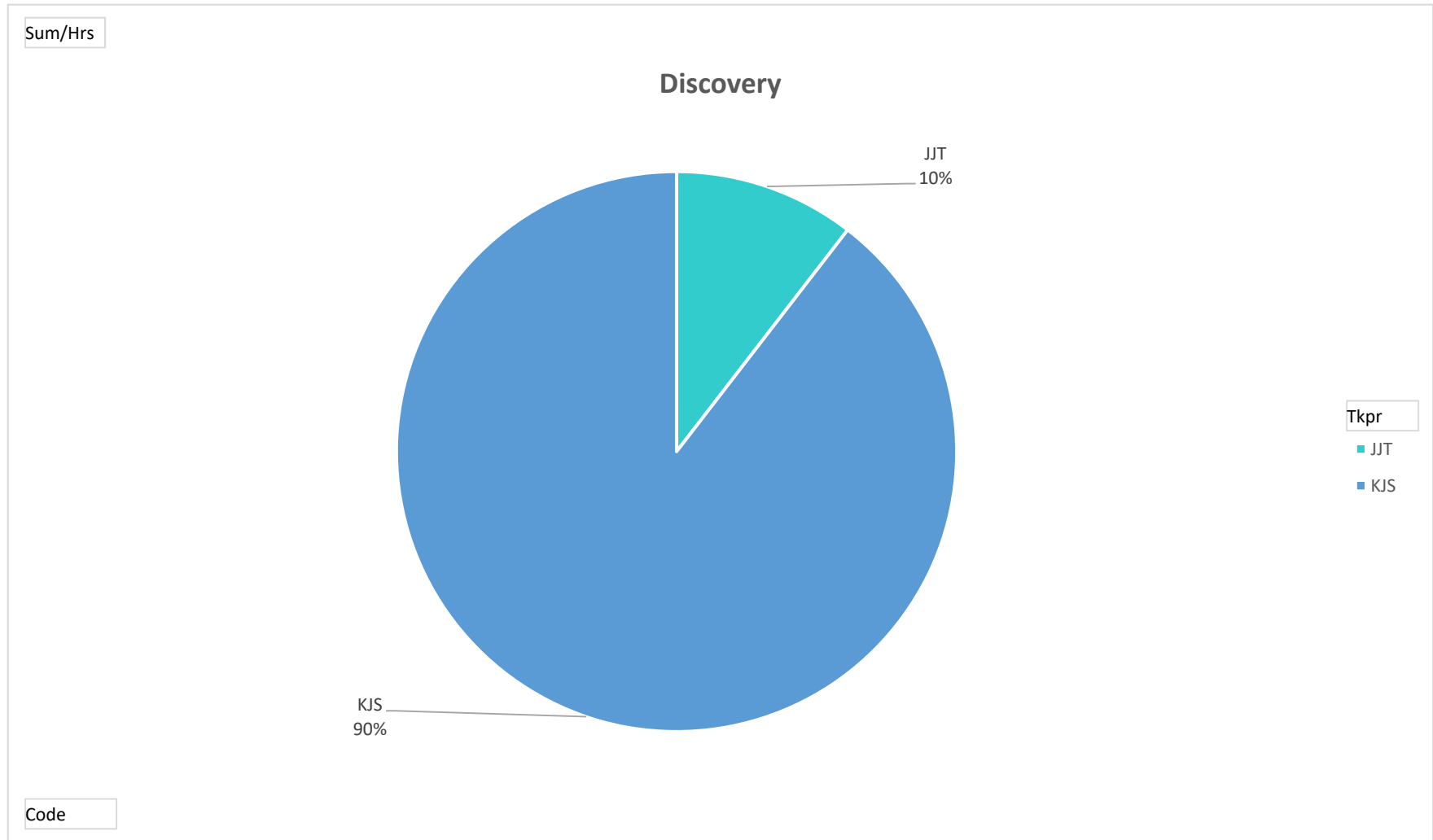
Pleadings, Conferences & Motions						
Sum / Hrs						
Tkpr	Pleadings	Ct Conf	Written Mtns	Disp Mtns	Cond. Cert	Grand Total
JJT	1.6					1.6
KJS	15	21.9	6	3.9	1	47.8
LCY	1.4					1.4
CRA	2.9		0.2		10.3	13.4
VLS	1.1			16.8		17.9
AEY	0.8			0.7		1.5
Grand Total	22.8	21.9	6.2	21.4	11.3	83.6



Client Communication		
Sum/Hrs		
Tkpr	106	Totals
KJS	5.8	5.8
VLS	0.8	0.8
AEY	6.4	6.4
Totals	13	13

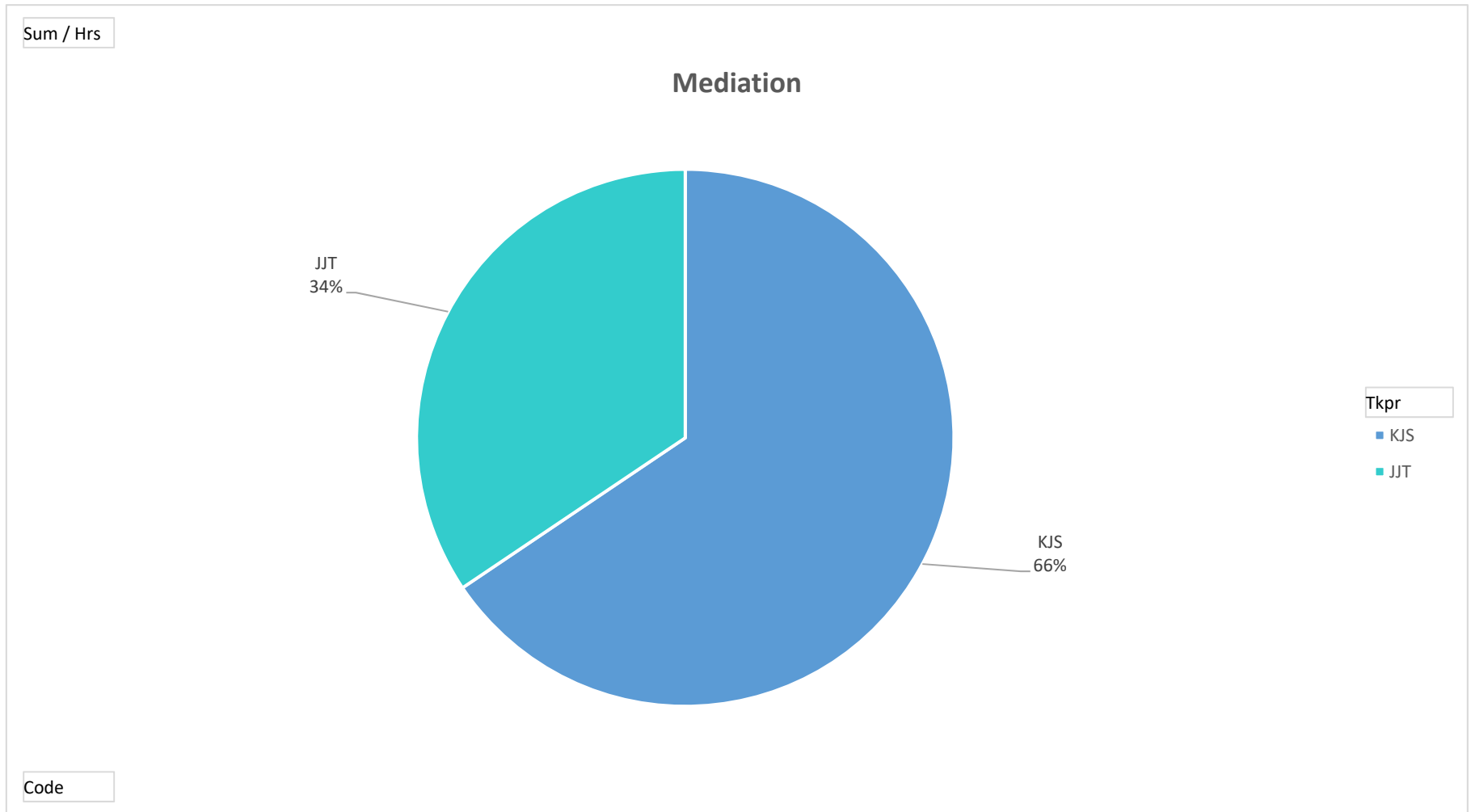


DISCOVERY		
Sum/Hrs		
Tkpr	Discovery	Totals
JJT	2.5	2.5
KJS	21.4	21.4
Totals	23.9	23.9



MEDIATION

Sum / Hrs		
Row Labels	Mediation	Totals
KJS	61.5	61.5
JJT	32.3	32.3
Totals	93.8	93.8



SETTLEMENT

Sum/Hrs		
Tkpr	Settlement	Totals
JJT	0.4	0.4
KJS	6.3	6.3
CRA	0.2	0.2
VLS	1.7	1.7
Totals	8.6	8.6

