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10 Attorneys for Plaintiff Winifred Cabiness and the putative class

11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 WINIFRED CABINESS, individually and on  
16 behalf of all others similarly situated,

17 Plaintiff,

18 v.

19 EDUCATIONAL FINANCIAL SOLUTIONS,  
20 LLC dba CAMPUS DEBT SOLUTIONS, BETA  
INVESTMENT GROUP, INC.; EQUITY  
21 ACQUISITIONS, LLC; VENTURETECH  
SOLUTIONS, LLC; DEBT.COM, LLC; and  
22 HOWARD DVORKIN

23 Defendants.

**Case No. 3:16-cv-01109-JST**

**DECLARATION OF SHARON DJEMAL  
IN SUPPORT OF PLAINTIFF'S MOTION  
FOR ORDER APPROVING SERVICE  
AWARD, ATTORNEY'S FEES, AND  
COSTS**

**Date: November 15, 2018**

**Time: 2:00 p.m.**

**Dept.: Courtroom 9, 19th Floor**

**Hon. Jon S. Tigar**

24 I, Sharon Djemal, hereby declare as follows:

25 1. I am a member of the Bar of the State of California and am admitted to practice  
26 before this Court. I am the Director of the Consumer Justice Clinic at the East Bay Community  
27 Law Center ("EBCLC"), co-counsel for Plaintiff in the action. I make this declaration in support  
28

1 of Plaintiff's Motion for Order Approving Service Awards, Attorney's Fees, and Costs. I have  
2 personal knowledge of the facts set forth in this declaration and, if called upon to do so, could  
3 and would testify competently thereto, except where I make a statement on information and  
4 belief, in which case I am informed and believe the statement to be true.

5         2.         In addition to directing the Consumer Justice Clinic, I am a Lecturer at University  
6 of California Berkeley Law School, where I co-teach the East Bay Community Law Center  
7 Clinic and Advanced East Bay Community Law Center Clinic, focusing primarily on Consumer  
8 Law, ethics, and litigation skills.

9         3.         I graduated from Columbia University School of Law in 1998. I received a two-  
10 year Soros Justice Fellowship to work as an attorney at the Urban Justice Center ("UJC") in New  
11 York City, New York immediately after graduating. After my fellowship at UJC ended, I began  
12 working as a Staff Attorney in the Housing Practice at the East Bay Community Law Center,  
13 where I litigated housing cases for 14 years. In August 2014, I became the Director of the  
14 Consumer Justice Clinic at EBCLC, and have been representing clients on consumer matters in  
15 both State and Federal Court. I was admitted to the New York Bar in or around January 1999  
16 and to the California Bar in or around October 2000. A true and correct copy of my resume,  
17 which describes my professional experience in more detail and lists some of my trainings and  
18 other professional activities, is attached hereto as **Exhibit A**.

19         4.         I have reviewed my own time records for this case. I kept the time records  
20 contemporaneously in accordance with EBCLC's procedures. The time I spent on the case as  
21 reflected in the EBCLC time records was reasonable and necessary to properly represent Ms.  
22 Winifred Cabiness and this Class.

23         5.         My current billing rate is \$525 per hour. I believe that rate is commensurate with  
24 my experience and abilities.

25         6.         I am familiar with the students at EBCLC who provided services in this case  
26 under my supervision.

27         7.         Luke Diamond, Jackie Zaneri, Robin Wetherill, and Sarah Mullins were third-  
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1 year Berkeley-law-student-interns at EBCLC who worked on this case. I believe that an hourly  
2 rate of \$150 per hour is a reasonable rate for their time.

3 8. Lauren Freeman was a second-year Berkeley-law-student-intern at EBCLC who  
4 worked on this case. I believe that an hourly rate of \$125 per hour is a reasonable rate for her  
5 time.

6 9. Tong Jin was a rising-second-year-law-student-intern from Lewis and Clerk Law  
7 School. Daniel Contreras was a rising-second-year-law-student-intern from Berkeley Law  
8 School. I believe that an hourly rate of \$100 per hour is a reasonable rate for their time. I have  
9 also reduced their hours by 25%.

10 10. I also supervised a volunteer paralegal, who spent 12 hours organizing discovery  
11 documents in this case. I am not billing for this time.

12 11. From the inception of this case through September 5, 2018, my students and I  
13 spent in excess of 248 hours on this matter. Specifically, EBCLC's contemporaneous  
14 timekeeping through September 5, 2018 reflects the following time, hourly rates, and lodestar for  
15 the timekeepers listed below:

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Lodestar</u>
Sharon Djemal	198.0	\$525	\$103,950.00
Luke Diamond (3L)	18.5	\$150	\$2,775.00
Jackie Zaneri (3L)	35.2	\$150	\$5,280.00
Robin Wetherill (3L)	9.5	\$150	\$1,425.00
Sarah Mullins (3L)	40.1	\$150	\$6,015.00
Lauren Freeman (2L)	9.3	\$125	\$1,162.50
Tong Jin (Rising 2L)	2.9	\$100	\$290.00
Daniel Contreras (Rising 2L)	13.5	\$100	\$1,350.00
<b>TOTAL:</b>			<b>\$122,247.50</b>

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27 12. I have attached a printout of an excel spreadsheet detailing this time, attached as  
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1 **Exhibit B.** The time reflected in EBCLC's time records reflects the exercise of billing  
2 judgment. There were numerous conversations, email exchanges, administrative and other tasks  
3 that are not included in the above time.

4 13. EBCLC has also incurred that following costs in connection with this litigation:  
5 \$120 for process serving fees, \$89 in transportation, and \$13.40 in mailing costs.

6 I declare under penalty of perjury under the laws of the State of California that the  
7 foregoing is true and correct, and that this declaration was executed on September 7, 2018 in  
8 Berkeley, California.

9 /s/ Sharon Djemal  
10 Sharon Djemal

11 **LOCAL RULE 5-1(i)(3) STATEMENT**

12 Pursuant to Local Rule 5-1(i)(3), I hereby attest that in concurrence to the filing of this  
13 document permission was obtained from the signatory, and that I will maintain records to  
14 support this concurrence by the signatory subject to this declaration as required under the local  
15 rules.

16 Dated: September 7, 2018

KEMNITZER, BARRON & KRIEG, LLP

18 /s/ Elliot Conn  
19 ELLIOT CONN  
20 445 Bush St., 6th Floor  
21 San Francisco, CA 94108  
22 Telephone: (415) 632-1900  
23 Facsimile: (415) 632-1901  
24 elliot@kbklegal.com  
25  
26  
27  
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# **EXHIBIT A**

**Sharon Djemal**  
**East Bay Community Law Center**  
**1950 University Ave., Suite 200**  
**Berkeley, CA 94704**  
**(510)269-6612**

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## **PROFESSIONAL EXPERIENCE**

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### **East Bay Community Law Center, Consumer Justice Clinic, Berkeley, CA** **August 2014 – Present**

Director and Clinical Instructor: Develop and implement programmatic vision and strategy for EBCLC's consumer litigation and clinic, train and supervise attorneys and law students on litigation skills, ethics, and consumer laws, represent consumers in debt collection defense cases and affirmative litigation, and manage policy advocacy work.

### **U.C. Berkeley Law School, Lecturer, Berkeley, CA** **January 2018 – Present**

Co-Teach East Bay Community Law Center Clinic and Advanced East Bay Community Law Center Clinic.

### **East Bay Community Law Center, Housing Practice, Berkeley, CA** **August 2000 – August 2014**

Supervising Attorney and Clinical Instructor (2010 – 2014): Supervised attorneys, paralegal, and law students in housing litigation, including unlawful detainers and administrative proceedings, while managing my own active caseload. Directed pro per clinic, which provides limited scope services to tenants being sued in unlawful detainer. Taught Berkeley Law students housing law, litigation skills, research and writing, interviewing skills, negotiations, and ethics.

Supervising Attorney (2008 – 2009): Supervised attorneys, intake specialist, and law students in housing litigation, including unlawful detainers and administrative proceedings, while managing my own active caseload. Directed pro per clinic, which provides limited scope services to tenants being sued in unlawful detainer.

Staff Attorney (2000 – 2007): Represented tenants being evicted from their homes or being threatened with termination of their subsidies. Supervised law students enrolled in the EBCLC clinic. Ran tenants rights workshops for low-income tenants who needed advice and assistance with any legal problems arising out of their tenancies.

### **Urban Justice Center, Homelessness Outreach and Prevention Project, New York, NY** **September 1998 to August 2000**

Soros Justice Fellow: Represented families being evicted from New York City public housing on charges that family members had engaged in criminal activity. Educated public housing tenants on their rights and responsibilities. Organized clinic at Columbia law school and supervised students representing tenants at termination hearings.

**Sharon Djemal, page two**

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**PUBLICATIONS & PRESENTATIONS**

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*Representing Clients with Mental Disabilities and Challenging Behaviors*, Program Chair, Practicing Law Institute, September 25, 2015.

*Working with Immigrants: The Intersection of Basic Immigration, Housing, and Domestic Violence Issues*, Program Chair, Practicing Law Institute, May 14, 2013 and May 13, 2014.

*Tenants' Rights in Foreclosure*, Speaker, Public Interest Clearinghouse, November 2, 2010.

*Defending Unlawful Detainers: Training Pro Bono Attorneys to Help Families Avoid Homelessness*, Speaker, Practicing Law Institute, October 26, 2010.

*Fresno Foreclosure Forum, Protecting Tenants Living in Foreclosed-On Homes*, Speaker, State Bar of California and Central California Legal Services, Inc., June 24, 2010.

*California Foreclosure Forum, Protecting Tenants Living in Foreclosed-On Homes*, Speaker, State Bar of California and Western Center on Law and Poverty, February 24, 2010.

*California Unlawful Detainer Defense Training*, Speaker, Practicing Law Institute, November 26, 2008.

*The Immigration Consequences of Criminal Activity*, Jailhouse Lawyers Manual, 4<sup>th</sup> Edition Supplement, Published by the Columbia Human Rights Law Review, 1998.

**EDUCATION**

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**Columbia University School of Law**, J.D. received, June 1998

Honors:       Lowenstein Fellowship  
               Jane Marks Clinical Advocacy Award  
               Harlan Fiske Stone Scholar

**Macalester College**, B.A. in Political Science and History, 1991

Honors:       Letters of Academic Excellence

**OTHER PROFESSIONAL ACTIVITIES AND CREDENTIALS**

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**U.C. Berkeley Eleanor Swift Award for Public Service Recipient (2016)**

**Standing Committee on the Delivery of Legal Services (2012 – 2015)**: Member of the California Bar Association Advisory Committee charged with improving the delivery of legal services to low and moderate-income individuals. **(2015-2016)**: Vice-chair. **(2016-2017)**: Chair

**The Philip A. Harley Memorial Mock Trial Competition (2011 – 2013)**: Score high school students during their mock trial competition at the Alameda County Superior Courthouse.

# **EXHIBIT B**



## BY DATE

DATE	NAME	TASK	RATE	TIME	TOTAL
6/15/2015	Lauren Freeman	Met with client to gather facts for possible affirmative lawsuit	\$125.00	1.80	\$225
6/15/2015	Lauren Freeman	Drafted summary of facts and emailed them to client to review	\$125	0.4	\$50
6/15/2015	Sharon Djemal	Reviewed summary of facts and email	\$525	0.1	\$53
6/17/2015	Lauren Freeman	Phone call with client. Amdended summary of facts accordingly	\$125	0.5	\$63
		Met with client to discuss possible class action. Interviewed client to determine if there was any financial damage for purposes of a 17200 Claim. Also discussed call from (510)270-2836.			
6/23/2015	Lauren Freeman		\$125	1.6	\$200
6/23/2015	Sharon Djemal	Meeting with client	\$525	1.9	\$998
		After consulting with SD, emailed client asking her to start a phone log for all unknown calls.			
6/25/2015	Lauren Freeman		\$125	0.2	\$25
6/25/2015	Sharon Djemal	Discussed Case with Lauren	\$525	0.1	\$53
7/15/2015	Lauren Freeman	Researched TCPA and consulted w/ SD	\$125	1.1	\$138
7/16/2015	Sharon Djemal	Discussed TCPA Research with Lauren	\$525	0.4	\$210
7/17/2015	Sharon Djemal	Researched TCPA	\$525	2.7	\$1,418
7/24/2015	Lauren Freeman	Researched CDS and Howard Dvorkin	\$125	1.9	\$238
7/24/2015	Lauren Freeman	Transcribed 1-800 Phone Tree	\$125	0.6	\$75
7/31/2015	Lauren Freeman	Prepared timeline	\$125	0.8	\$100
8/12/2015	Sharon Djemal	Reviewed and edited timeline, notes, and docs	\$525	0.7	\$368
		Phone call with client with questions for TCPA COA. Sent follow up email.			
9/24/2015	Luke Diamond		\$150	0.4	\$60
10/7/2015	Lauren Freeman	Phone call with client regarding Metro PCS records	\$125	0.1	\$13
11/13/2015	Lauren Freeman	Phone call w/ client re CDS non-stop calls	\$125	0.3	\$38
11/23/2015	Luke Diamond	Email exchange w/ client re new calls and metro PCS	\$150	0.2	\$30
12/7/2015	Luke Diamond	Phone call w/ Metro PCS - insisted on subpoena	\$150	0.3	\$45
1/25/2016	Luke Diamond	Phone call w/ Cabiness about lawsuit	\$150	0.4	\$60
1/31/2016	Sharon Djemal	Researched TCPA, reviewed file and notes	\$525	1.3	\$683
2/18/2016	Luke Diamond	Drafted complaint, cover letter, and IFP	\$150	5	\$750

	Researched TCPA, Edited complaint, IFP, Drafted Retainer Agreement	\$525	4.7	\$2,468
2/25/2016 Sharon Djemal	Finalized Complaint, etc.	\$150	1.2	\$180
2/25/2016 Luke Diamond	Met with client to review complaint, retainer, IFP, etc.	\$150	2.5	\$375
3/3/2016 Luke Diamond	Met with client to review complaint, retainer, IFP, etc.	\$525	2.5	\$1,313
3/3/2016 Sharon Djemal	Case Filed	\$525	0.4	\$210
3/4/2016 Sharon Djemal	Drafted document preservation letter	\$525	0.6	\$315
3/6/2016 Sharon Djemal	Emailed and mailed document preservation letter	\$150	0.1	\$15
3/7/2016 Luke Diamond	Emailed courtesy copy of complaint to Keith Wasserstrom at HSD Holdings	\$150	0.1	\$15
3/8/2016 Luke Diamond	Emailed Beeler's Clerk re Summons	\$150	0.1	\$15
3/14/2016 Luke Diamond	Called US Marshall re Service	\$150	0.1	\$15
3/17/2016 Luke Diamond	Phone call / Chris Meier about settlement/ confidentiality	\$525	0.6	\$315
3/18/2016 Sharon Djemal	Prepared subpoena for Metro PCS and arranged for service	\$125	0.3	\$38
3/24/2016 Luke Diamond	Reviewed confidentiality agreement and compared w/ Northern District. Emailed it back with proposed changes.	\$525	0.9	\$473
3/24/2016 Sharon Djemal	Emailed o/c regarding their refusal to stipulate to a subpoena.			
3/25/2016 Sharon Djemal	Proposed settlement.	\$525	0.6	\$315
3/25/2016 Sharon Djemal	Researched and drafted email re courts inherent authority to grant preservation order	\$525	1.5	\$788
3/30/2016 Sharon Djemal	Settlement call w/ o/c.	\$525	0.4	\$210
4/4/2016 Sharon Djemal	Called clt re settlement call and sent follow up email	\$150	0.1	\$15
4/4/2016 Luke Diamond	Drafted and sent records preservation request to Metro PCS	\$150	0.3	\$45
4/5/2016 Luke Diamond	Read declaration to Cabiness in support of ex parte motion	\$150	0.1	\$15
4/6/2016 Luke Diamond	Emailed o/c about ex parte application	\$525	0.1	\$53
4/7/2016 Sharon Djemal	Drafted Ex-Parte	\$150	3.5	\$525
4/8/2016 Luke Diamond	Reviewed/ finalized ex parte request	\$525	1.1	\$578
4/10/2016 Sharon Djemal	Faxed order to MetroPCS. Confirmed receipt.	\$150	0.3	\$45
4/12/2016 Luke Diamond	Spoke to o/c. Follow up email.	\$525	0.5	\$263
4/12/2016 Sharon Djemal	conversation w/ client about offer.	\$525	0.6	\$315
4/15/2016 Sharon Djemal				

4/18/2016	Sharon Djemal	conversation w/ client about offer. Emailed o/c	\$525	0.7	\$368
4/20/2016	Luke Diamond	Confirmed receipt and preservation with MetroPCS	\$150	0.1	\$15
4/20/2016	Sharon Djemal	Conversation with o/c about offer	\$525	0.2	\$105
5/2/2016	Sharon Djemal	Email exchange with o/c re meet and confer	\$525	0.6	\$315
5/3/2016	Sharon Djemal	Phone call w/ o/c re continuance and subpoena	\$525	0.2	\$105
5/4/2016	Luke Diamond	Drafted stip to continue CMC; phone call w/ marshall	\$150	3	\$450
5/4/2016	Sharon Djemal	Reviewed and edited stip	\$525	0.7	\$368
5/5/2016	Luke Diamond	Prepared subpoena and emailed it to one-hour for service	\$150	0.4	\$60
5/6/2016	Sharon Djemal	Phone call w/ o/c. Emailed word version of stip	\$525	0.2	\$105
5/9/2016	Sharon Djemal	Phone call w/ marshall	\$525	0.1	\$53
5/9/2016	Sharon Djemal	Prepared and emailed written stip re subpoena	\$525	0.2	\$105
5/9/2016	Sharon Djemal	email exchange w. o/c re stip. Finalized.	\$525	0.1	\$53
6/2/2016	Sharon Djemal	Spoke to subpoena compliance officer.	\$525	0.2	\$105
6/9/2016	Tong Jin	Phone calls w/ Metro PCS, One Hour, Faxed evidence, etc.	\$125	0.5	\$63
6/10/2016	Sharon Djemal	Meet and confer w/ o/c re discovery, CMC	\$525	0.3	\$158
6/10/2016	Sharon Djemal	Spoke to client about consent and contract	\$525	0.2	\$105
6/10/2016	Tong Jin	Met and Conferred with Sharon	\$100	0.3	\$30
6/11/2016	Sharon Djemal	Call with client about meeting	\$525	0.2	\$105
6/12/2016	Sharon Djemal	Research on concrete harm	\$525	0.8	\$420
6/13/2016	Sharon Djemal	Meeting w/ client re ADR and harm, filed ADR form	\$525	0.6	\$315
6/14/2016	Tong Jin	Email exchange w/ Metro PCS	\$125	0.2	\$25
6/17/2016	Sharon Djemal	Opposition to MTD	\$525	5.9	\$3,098
6/19/2016	Sharon Djemal	Opposition to MTD	\$525	9	\$4,725
6/20/2016	Sharon Djemal	Opposition to MTD	\$525	8.5	\$4,463
6/20/2016	Tong Jin	Filed opposition and declaration	\$100	0.5	\$50
6/21/2016	Tong Jin	Phone call w/ Metro PCS	\$100	0.2	\$20
6/28/2016	Sharon Djemal	Drafted Joint CMC	\$525	0.9	\$473
7/5/2016	Sharon Djemal	Phone call w/ o/c. Phone call w/ clt	\$525	0.4	\$210
7/7/2016	Sharon Djemal	Phone call w/ client re offer and names and contact info of witnesses.	\$525	1.1	\$578

7/8/2016	Sharon Djemal	Initial disclosures	\$525	1.9	\$998
7/12/2016	Sharon Djemal	Discovery	\$525	2.2	\$1,155
7/15/2016	Sharon Djemal	Phone call w/ client confirming facts, mtg w/ Elliot	\$525	0.9	\$473
7/21/2016	Sharon Djemal	Meeting w/ Elliot and clt.	\$525	1.5	\$788
7/22/2016	Sharon Djemal	Call w/ o/c re offer, records, discovery, etc	\$525	0.3	\$158
7/22/2016	Tong Jin	Drafted Joint CMC	\$125	1.2	\$150
7/26/2016	Sharon Djemal	Finalized and filed Joint CMC	\$525	0.3	\$158
8/4/2016	Sharon Djemal	CMC and MTD Hrg	\$525	1.8	\$945
8/17/2016	Sharon Djemal	Phone call w/ Jessica and next w/ clt re new offer	\$525	0.4	\$210
8/19/2016	Sharon Djemal	Call w/ clt. Re offer, risks, etc.	\$525	0.9	\$473
8/19/2016	Sharon Djemal	Reviewed co-counsel/ retainer. Emailed rates	\$525	0.4	\$210
8/19/2016	Sharon Djemal	Email to o/c re settlement	\$525	0.1	\$53
8/25/2016	Sharon Djemal	Prepared joint scheduling statement and emailed to o/c	\$525	0.6	\$315
8/30/2016	Sharon Djemal	Emailed o/c re Joint Scheduling Conference	\$525	0.1	\$53
8/31/2016	Sharon Djemal	Call w/ Elliot and Bryan; Follow up email w/ o/c	\$525	0.2	\$105
9/7/2016	Sharon Djemal	Call w/ Bryan and Elliot to prep for CMC	\$525	0.1	\$53
9/8/2016	Sharon Djemal	CMC	\$525	1.4	\$735
9/12/2016	Jackie Zaneri	Began drafting meet and confer	\$125	1	\$125
9/13/2016	Sharon Djemal	Call w/ o/c - conveyed new offer. Client rejected. Told Elliot	\$525	0.3	\$158
9/15/2016	Sharon Djemal	Reiviewed amended complaint. Sent Elliot comments.	\$525	0.7	\$368
9/15/2016	Sharon Djemal	Phone call w/ client. Reviewed all facts.	\$525	0.6	\$315
9/15/2016	Jackie Zaneri	Meet and Confer	\$150	3.5	\$525
9/16/2016	Jackie Zaneri	Meet and Confer	\$150	2.9	\$435
9/22/2016	Jackie Zaneri	Meet and Confer	\$150	3.1	\$465
9/23/2016	Jackie Zaneri	Meet and Confer	\$150	1.4	\$210
10/2/2016	Sharon Djemal	Meet and Confer	\$525	3.2	\$1,680
10/11/2016	Jackie Zaneri	Discovery Responses	\$150	6.5	\$975
10/19/2016	Jackie Zaneri	Discovery Responses	\$150	3.9	\$585
10/20/2016	Sharon Djemal	Discovery Responses	\$525	4.6	\$2,415
10/23/2016	Jackie Zaneri	Discovery Responses	\$150	4.3	\$645

10/28/2016	Jackie Zaneri	Discovery Responses	\$150	5.4	\$810
10/29/2016	Sharon Djemal	Phone call w/ client - for discovery responses	\$525	1.7	\$893
10/31/2016	Sharon Djemal	Reviewed new documents left by client	\$525	0.6	\$315
		Talked to client to arrange discovery review; reviewed docs from Jackie			
11/1/2016	Sharon Djemal	Jackie	\$525	1.1	\$578
11/1/2016	Jackie Zaneri	Final review and scan of all documents for discovery	\$150	3.2	\$480
11/2/2016	Sharon Djemal	Met w/ client to review discovery; Finalized discovery	\$525	4.3	\$2,258
11/15/2016	Sharon Djemal	Opposition to MTD/ Stay	\$525	3.1	\$1,628
11/16/2016	Sharon Djemal	Opposition to MTD/ Stay	\$525	6.3	\$3,308
11/17/2016	Sharon Djemal	Opposition to MTD/ Stay	\$525	5.9	\$3,098
11/29/2016	Sharon Djemal	Reviewed Depo notice. Emailed Elliot	\$525	0.2	\$105
12/6/2016	Sharon Djemal	Reviewed meet and confer. Emailed summary to Elliot and Bryan	\$525	0.9	\$473
12/12/2016	Sharon Djemal	Emailed client re emails from Metro PCS	\$525	0.1	\$53
12/12/2016	Sharon Djemal	Spoke to Elliot and Bryan re meet and confer	\$525	0.2	\$105
		Drafted response to their meet and confer letter and sent to Elliot and Bryan			
12/14/2016	Sharon Djemal	Elliot and Bryan	\$525	2.2	\$1,155
12/15/2016	Sharon Djemal	Edited meet and confer response and returned to co-counsel	\$525	0.4	\$210
12/19/2016	Sharon Djemal	Reviewed responses. Sent notes to co-counsel	\$525	0.5	\$263
12/22/2016	Sharon Djemal	Met and conferred by phone. Drafted summary of call.	\$525	1	\$525
1/6/2017	Sharon Djemal	Met with client to discuss supplemental responses	\$525	1	\$525
		Prepared supplemental interrogatory responses. Emailed to co-counsel			
1/6/2017	Sharon Djemal	Drafted supplemental responses to RPOD w/ privilege log. Sent to co counsel.	\$525	2.1	\$1,103
1/6/2017	Sharon Djemal	co counsel.	\$525	1.5	\$788
1/9/2017	Sharon Djemal	Careful review of all documents in drive. Redacted everything.	\$525	3.2	\$1,680
		Rescanned, reviewed redactions, and email and mailed responses w/ POS			
10-Jan	Sharon Djemal		\$525	1.2	\$630
1/12/2017	Sarah Mullins	Called t-mobile	\$150	0.3	\$45
1/19/2017	Sarah Mullins	Spoke to client. Sent her call records	\$150	0.2	\$30

1/20/2017	Sarah Mullins	Email communication with Metro PCS re abnormal completion	\$150	0.2	\$30
1/27/2017	Sarah Mullins	Created excel spreadsheet with Metro PCS records	\$150	6.5	\$975
1/29/2017	Sharon Djemal	Reviewed Sarah's spreadsheets	\$525	0.3	\$158
1/30/2017	Sarah Mullins	Email co-counsel re call records	\$150	0.20	\$30
1/30/2017	Sharon Djemal	Call with o/c re JAMS	\$525	0.2	\$105
2/2/2017	Sarah Mullins	Created index of CDS discovery responses by bate number	\$150	1.5	\$225
2/2/2017	Sarah Mullins	Created more excel spreadsheets comparing CDS records with Metro PCS records and our records	\$150	4.4	\$660
2/9/2017	Sarah Mullins	Researched other COAs and emailed Elliot co-counsel	\$150	2.1	\$315
2/9/2017	Sharon Djemal	Reviewed research and training manual.	\$525	0.4	\$210
2/10/2017	Sharon Djemal	Emailed co-counsel re training manual	\$525	0.2	\$105
2/10/2017	Sarah Mullins	Emailed Professor Hoofnagle about privacy COA	\$150	0.3	\$45.00
2/10/2017	Sharon Djemal	Emailed co-counsel about disclosures in training manual	\$525	0.2	\$105
2/14/2017	Sharon Djemal	Reviewed documents and emailed Elliot	\$525	0.6	\$315
2/15/2017	Sharon Djemal	Conversation with Professor Hoofnagle	\$525	0.8	\$420
2/15/2017	Sarah Mullins	Conversation with Hoofnagle and emailed summary to Elliot	\$150	1	\$150
2/16/2017	Sharon Djemal	Depo by phone	\$525	5	\$2,625
2/17/2017	Sharon Djemal	Depo by phone	\$525	1.5	\$788
3/2/2017	Sarah Mullins	Research on piercing the corporate veil and writing summary	\$150	2	\$300
3/8/2017	Sharon Djemal	Reviewed research and discussed with Sarah	\$525	0.3	\$158
3/8/2017	Sharon Djemal	CMC	\$525	1.5	\$788
3/13/2017	Sarah Mullins	Reviewed second amended complaint and suggested edits	\$150	0.4	\$60
3/13/2017	Sharon Djemal	Reviewed second amended complaint, researched single-enterprise doctrine, emailed co-counsel suggested edits	\$525	1.5	\$788
3/13/2017	Sarah Mullins	Researched piercing the veil and pleading standards under FI and De law for amended complaint	\$150	2.3	\$345
3/16/2017	Sharon Djemal	Reviewed and discussed research with Sarah	\$525	0.6	\$315
3/16/2017	Sharon Djemal	Finalized and emailed meet and confer letter with transcript portions	\$525	1.2	\$630

		Created an outline of topics to discuss on meet and confer call re			
3/16/2017	Sarah Mullins	30b6 witness and drafted letter	\$150	2.5	\$375
3/20/2017	Sharon Djemal	Meet and Confer call with Jessica and Jim	\$525	0.5	\$263
3/20/2017	Sharon Djemal	Prepared, emailed and mailed supplemental RPOD responses	\$525	1.2	\$630
3/24/2017	Sarah Mullins	Drafted new interrogatories and RPOD	\$150	2.5	\$375
3/24/2017	Sharon Djemal	Reviewed and edited and sent discovery to Elliot	\$525	0.9	\$473
29-Mar	Sharon Djemal	Emailed co-counsel about depo	\$525	0.1	\$53
4/6/2017	Sarah Mullins	Consulted with Miguel about discovery responses	\$150	0.3	\$45
4/6/2017	Sarah Mullins	Talked to Elliot about production; called client and left msg.	\$150	0.2	\$30
4/6/2017	Sarah Mullins	Spoke to client about Interrogatory 5, typed up notes	\$150	0.4	\$60
4/13/2017	Sarah Mullins	Drafted supplemental responses and sent to Elliot	\$150	1	\$150.00
4/14/2017	Sarah Mullins	Spoke to client about response	\$150	0.3	\$45.00
4/18/2017	Sharon Djemal	Reviewed supplemental responses w/ client	\$525	0.3	\$158
		Listened to recordings, sorted out Cabiness timeline, drafted facts			
5/24/2017	Sharon Djemal	for mediation brief	\$525	3.6	\$1,890
		Continued to sort out facts with Kara, drafted procedural history,			
5/25/2017	Sharon Djemal	started drafting business model	\$525	2.3	\$1,208
		Spoke to client about schedule, edited mediation brief and			
5/26/2017	Sharon Djemal	emailed back to co-counsel	\$525	2.7	\$1,418
5/30/2017	Sharon Djemal	Reviewed mediation brief and sent final comments to Elliot	\$525	0.7	\$368
		Reiewed meet and confer letter. Sent email to co-counsel with			
5/30/2017	Sharon Djemal	ideas for response	\$525	0.7	\$368
6/5/2017	Sharon Djemal	Mediation in LA	\$525	12	\$6,300
6/8/2017	Sharon Djemal	Prepared joint CMS	\$525	0.5	\$263
		Researched and began drafting memo on jurisdiction for motion			
6/20/2017	Daniel Contreras	for preliminary approval if defendant had not appeared	\$100	2	\$200
6/21/2017	Daniel Contreras	Continued to research and draft memo	\$100	5	\$500
6/23/2017	Daniel Contreras	Finished memo	\$100	6.5	\$650
8/11/2017	Sarah Mullins	Started Motion for Preliminary Approval	\$150	5	\$750
10/2/2017	Sharon Djemal	Call with o/c	\$525	0.5	\$263



10/3/2017	Sharon Djemal	Edited stipulation	\$525	0.1	\$53
10/30/2017	Sharon Djemal	Call with o/c	\$525	0.5	\$263
10/30/2017	Robin Wetherill	Call with o/c	\$150	0.5	\$75
11/15/2017	Robin Wetherill	Motion for Preliminary Approval	\$150	3	\$450
11/17/2017	Robin Wetherill	Works on Motion	\$150	2	\$300
11/20/2017	Robin Wetherill	Works on Motion	\$150	4	\$600
12/15/2017	Sharon Djemal	Prepared and filed notice of change of address	\$525	0.5	\$263
12/20/2017	Sharon Djemal	Reviewed settlement agreement and release	\$525	0.7	\$368
12/24/2017	Sharon Djemal	Motion for Preliminary Approval	\$525	2.5	\$1,313
12/28/2017	Sharon Djemal	Motion for Preliminary Approval	\$525	4.7	\$2,468
12/29/2017	Sharon Djemal	Motion for Preliminary Approval	\$525	5.2	\$2,730
12/31/2017	Sharon Djemal	Motion for Preliminary Approval	\$525	3.2	\$1,680
1/1/2018	Sharon Djemal	Motion for Preliminary Approval	\$525	5.3	\$2,783
1/2/2018	Sharon Djemal	Motion for Preliminary Approval	\$525	4.5	\$2,363
1/8/2018	Sarah Mullins	Declaration of Bryan Kemnitzer	\$150	2.5	\$375
1/11/2018	Sharon Djemal	Reviewed Motion and Declaration	\$525	0.9	\$473
1/11/2018	Sarah Mullins	Edited Motion and Declaration	\$150	3	\$450
1/16/2018	Sharon Djemal	Phone call w/ former student re Judge	\$525	0.2	\$105
1/17/2018	Sharon Djemal	Reviewed agreements. Phone call with c/c and o/c	\$525	2.4	\$1,260
1/18/2018	Sarah Mullins	Final edits to motion and dec.	\$150	1	\$150
1/18/2018	Sharon Djemal	Final edits to motion and dec.	\$525	0.7	\$368
1/22/2018	Sharon Djemal	Phone call w/ student	\$525	0.2	\$105
1/23/2018	Sharon Djemal	Edited long form notice	\$525	0.6	\$315
1/25/2018	Sharon Djemal	Phone call with Cabiness about settlement	\$525	0.3	\$158
1/26/2018	Sharon Djemal	Meeting w/ Cabiness to review and sign agreement	\$525	1.2	\$630
30-Mar	Sharon Djemal	Emailed Sarah about order re discovery dispute	\$525	0.1	\$53
9/5/2018	Sharon Djemal	Fee Declaration	\$525	3.1	\$1,627.50
6//18/16	Sharon Djemal	Opposition to MTD	\$525	7	\$3,675



## BY PERSON

DATE	NAME	TASK	RATE	TIME	TOTAL
		Researched and began drafting memo on jurisdiction for motion			
6/20/2017	Daniel Contreras	for preliminary approval if defendant had not appeared	\$100	2	\$ 200.00
6/21/2017	Daniel Contreras	Continued to research and draft memo	\$100	5	\$ 500.00
6/23/2017	Daniel Contreras	Finished memo	\$100	6.5	\$ 650.00
9/12/2016	Jackie Zaneri	Began drafting meet and confer	\$150	1	\$ 150.00
9/15/2016	Jackie Zaneri	Meet and Confer	\$150	3.5	\$ 525.00
9/16/2016	Jackie Zaneri	Meet and Confer	\$150	2.9	\$ 435.00
9/22/2016	Jackie Zaneri	Meet and Confer	\$150	3.1	\$ 465.00
9/23/2016	Jackie Zaneri	Meet and Confer	\$150	1.4	\$ 210.00
10/11/2016	Jackie Zaneri	Discovery Responses	\$150	6.5	\$ 975.00
10/23/2016	Jackie Zaneri	Discovery Responses	\$150	4.3	\$ 645.00
10/19/2016	Jackie Zaneri	Discovery Responses	\$150	3.9	\$ 585.00
10/28/2016	Jackie Zaneri	Discovery Responses	\$150	5.4	\$ 810.00
11/1/2016	Jackie Zaneri	Final review and scan of all documents for discovery	\$150	3.2	\$ 480.00
6/15/2015	Lauren Freeman	Met with client to gather facts for possible affirmative lawsuit	\$125	1.80	\$ 225.00
6/15/2015	Lauren Freeman	Drafted summary of facts and emailed them to client to review	\$125	0.4	\$ 50.00
6/17/2015	Lauren Freeman	Phone call with client. Amdended summary of facts accordingly	\$125	0.5	\$ 62.50
		Met with client to discuss possible class action. Interviewed			
		client to determine if there was any financial damage for			
		purposes of a 17200 Claim. Also discussed call from (510)270-			
6/23/2015	Lauren Freeman	2836.	\$125	1.6	\$ 200.00
		After consulting with SD, emailed client asking her to start a			
6/25/2015	Lauren Freeman	phone log for all unknown calls.	\$125	0.2	\$ 25.00
7/15/2015	Lauren Freeman	Researched TCPA and consulted w/ SD	\$125	1.1	\$ 137.50
7/24/2015	Lauren Freeman	Researched CDS and Howard Dvorkin	\$125	1.9	\$ 237.50
7/24/2015	Lauren Freeman	Transcribed 1-800 Phone Tree	\$125	0.6	\$ 75.00
7/31/2015	Lauren Freeman	Prepared timeline	\$125	0.8	\$ 100.00
10/7/2015	Lauren Freeman	Phone call with client regarding Metro PCS records	\$125	0.1	\$ 12.50
11/13/2015	Lauren Freeman	Phone call w/ client re CDS non-stop calls	\$125	0.3	\$ 37.50
		Phone call with client with questions for TCPA COA. Sent follow			
9/24/2015	Luke Diamond	up email.	\$150	0.4	\$ 60.00

11/23/2015	Luke Diamond	Email exchange w/ client re new calls and metro PCS	\$150	0.2	\$	30.00
12/7/2015	Luke Diamond	Phone call w/ Metro PCS - insisted on subpoena	\$150	0.3	\$	45.00
1/25/2016	Luke Diamond	Phone call w/ Cabiness about lawsuit	\$150	0.4	\$	60.00
2/18/2016	Luke Diamond	Drafted complaint, cover letter, and IFP	\$150	5	\$	750.00
2/25/2016	Luke Diamond	Finalized Complaint, etc.	\$150	1.2	\$	180.00
3/3/2016	Luke Diamond	Met with client to review complaint, retainer, IFP, etc.	\$150	2.5	\$	375.00
3/7/2016	Luke Diamond	Emailed and mailed document preservation letter	\$150	0.1	\$	15.00
3/8/2016	Luke Diamond	Emailed courtesy copy of complaint to Keith Wasserstrom at HSD Holdings	\$150	0.1	\$	15.00
3/14/2016	Luke Diamond	Emailed Beeler's Clerk re Summons	\$150	0.1	\$	15.00
3/17/2016	Luke Diamond	Called US Marshall re Service	\$150	0.1	\$	15.00
3/24/2016	Luke Diamond	Prepared subpoena for Metro PCS and arranged for service	\$125	0.3	\$	37.50
4/4/2016	Luke Diamond	Called clt re settlement call and sent follow up email	\$150	0.1	\$	15.00
4/5/2016	Luke Diamond	Drafted and sent records preservation request to Metro PCS	\$150	0.3	\$	45.00
4/6/2016	Luke Diamond	Read declaration to Cabiness in support of ex parte motion	\$150	0.1	\$	15.00
4/8/2016	Luke Diamond	Drafted Ex-Parte	\$150	3.5	\$	525.00
4/12/2016	Luke Diamond	Faxed order to MetroPCS. Confirmed receipt.	\$150	0.3	\$	45.00
4/20/2016	Luke Diamond	Confirmed receipt and preservation with MetroPCS	\$150	0.1	\$	15.00
5/4/2016	Luke Diamond	Drafted stip to continue CMC; phone call w/ marshall	\$150	3	\$	450.00
5/5/2016	Luke Diamond	Prepared subpoena and emailed it to one-hour for service	\$150	0.4	\$	60.00
10/30/2017	Robin Wetherill	Call with o/c	\$150	0.5	\$	75.00
11/15/2017	Robin Wetherill	Motion for Preliminary Approval	\$150	3	\$	450.00
11/17/2017	Robin Wetherill	Works on Motion	\$150	2	\$	300.00
11/20/2017	Robin Wetherill	Works on Motion	\$150	4	\$	600.00
1/12/2017	Sarah Mullins	Called t-mobile	\$150	0.3	\$	45.00
1/20/2017	Sarah Mullins	Email communication with Metro PCS re abnormal completion	\$150	0.2	\$	30.00
1/27/2017	Sarah Mullins	Created excel spreadsheet with Metro PCS records	\$150	6.5	\$	975.00
1/30/2017	Sarah Mullins	Email co-counsel re call records	\$150	0.20	\$	30.00
2/2/2017	Sarah Mullins	Created index of CDS discovery responses by bate number	\$150	1.5	\$	225.00
2/9/2017	Sarah Mullins	Researched other COAs and emailed Elliot co-counsel	\$150	2.1	\$	315.00
2/10/2017	Sarah Mullins	Emailed Professor Hoofnagle about privacy COA	\$150	0.3	\$	45.00
4/6/2017	Sarah Mullins	Talked to Elliot about production; called client and left msg.	\$150	0.2	\$	30.00

4/6/2017	Sarah Mullins	Spoke to client about Interrogatory 5, typed up notes	\$150	0.4	\$	60.00
4/13/2017	Sarah Mullins	Drafted supplemental responses and sent to Elliot	\$150	1	\$	150.00
1/19/2017	Sarah Mullins	Spoke to client. Sent her call records	\$150	0.2	\$	30.00
		Created more excel spreadsheets comparing CDS records with				
2/2/2017	Sarah Mullins	Metro PCS records and our records	\$150	4.4	\$	660.00
2/15/2017	Sarah Mullins	Conversation with Hoofnagle and emailed summary to Elliot	\$150	1	\$	150.00
3/2/2017	Sarah Mullins	Research on piercing the corporate veil and writing summary	\$150	2	\$	300.00
3/13/2017	Sarah Mullins	Reviewed second amended complaint and suggested edits	\$150	0.4	\$	60.00
		Researched piercing the veil and pleading standards under FI and				
3/14/2017	Sarah Mullins	De law for amended complaint	\$150	2.3	\$	345.00
		Created an outline of topics to discuss on meet and confer call re				
3/16/2017	Sarah Mullins	30b6 witness and drafted letter	\$150	2.5	\$	375.00
3/24/2017	Sarah Mullins	Drafted new interrogatories and RPOD	\$150	2.5	\$	375.00
4/6/2017	Sarah Mullins	Consulted with Miguel about discovery responses	\$150	0.3	\$	45.00
4/14/2017	Sarah Mullins	Spoke to client about response	\$150	0.3	\$	45.00
8/11/2017	Sarah Mullins	Started Motion for Preliminary Approval	\$150	5	\$	750.00
1/8/2018	Sarah Mullins	Declaration of Bryan Kemnitzer	\$150	2.5	\$	375.00
1/11/2018	Sarah Mullins	Edited Motion and Ceclaration	\$150	3	\$	450.00
1/18/2018	Sarah Mullins	Final edits to motion and dec.	\$150	1	\$	150.00
6/15/2015	Sharon Djemal	Reviewed summary of facts and email	\$525	1.1	\$	577.50
6/23/2015	Sharon Djemal	Meeting with client	\$525	1.9	\$	997.50
		Researched TCPA, Edited complaint, IFP, Drafted Retainer				
2/25/2016	Sharon Djemal	Agreement	\$525	4.7	\$	2,467.50
3/3/2016	Sharon Djemal	Met with client to review complaint, retainer, IFP, etc.	\$525	2.5	\$	1,312.50
3/4/2016	Sharon Djemal	Case Filed	\$525	0.4	\$	210.00
3/6/2016	Sharon Djemal	Drafted document preservation letter	\$525	0.6	\$	315.00
3/18/2016	Sharon Djemal	Phone call / Chris Meier about settlement/ confidentiality	\$525	0.6	\$	315.00
		Reviewed confidentiality agreement and compared w/ Northern				
3/24/2016	Sharon Djemal	District. Emailed it back with proposed changes.	\$525	0.9	\$	472.50
		Emailed o/c regarding their refusal to stipulate to a subpoena.				
3/25/2016	Sharon Djemal	Proposed settlement.	\$525	0.6	\$	315.00

	Researched and drafted email re courts inherent authority to				
3/30/2016	Sharon Djemal	grant preservation order	\$525	1.5	\$ 787.50
4/4/2016	Sharon Djemal	Settlement call w/ o/c.	\$525	0.4	\$ 210.00
4/7/2016	Sharon Djemal	Emailed o/c about ex parte application	\$525	0.1	\$ 52.50
4/10/2016	Sharon Djemal	Reviewed/ finalized ex parte request	\$525	1.1	\$ 577.50
4/12/2016	Sharon Djemal	Spoke to o/c. Follow up email.	\$525	0.5	\$ 262.50
4/15/2016	Sharon Djemal	conversation w/ client about offer.	\$525	0.6	\$ 315.00
4/18/2016	Sharon Djemal	conversation w/ client about offer. Emailed o/c	\$525	0.7	\$ 367.50
4/20/2016	Sharon Djemal	Conversation with o/c about offer	\$525	0.2	\$ 105.00
5/2/2016	Sharon Djemal	Email exchange with o/c re meet and confer	\$525	0.6	\$ 315.00
5/3/2016	Sharon Djemal	Phone call w/ o/c re continuance and subpoena	\$525	0.2	\$ 105.00
5/4/2016	Sharon Djemal	Reviewed and edited stip	\$525	0.7	\$ 367.50
5/6/2016	Sharon Djemal	Phone call w/ o/c. Emailed word version of stip	\$525	0.2	\$ 105.00
5/9/2016	Sharon Djemal	Phone call w/ marshall	\$525	0.1	\$ 52.50
5/9/2016	Sharon Djemal	Prepared and emailed written stip re subpoena	\$525	0.2	\$ 105.00
5/9/2016	Sharon Djemal	email exchange w. o/c re stip. Finalized.	\$525	0.1	\$ 52.50
6/10/2016	Sharon Djemal	Meet and confer w/ o/c re discovery, CMC	\$525	0.3	\$ 157.50
6/12/2016	Sharon Djemal	Research on concrete harm	\$525	0.8	\$ 420.00
6/13/2016	Sharon Djemal	Meeting w/ client re ADR and harm, filed ADR form	\$525	0.6	\$ 315.00
6/17/2016	Sharon Djemal	Opposition to MTD	\$525	5.9	\$ 3,097.50
6//18/16	Sharon Djemal	Opposition to MTD	\$525	7	\$ 3,675.00
6/19/2016	Sharon Djemal	Opposition to MTD	\$525	9	\$ 4,725.00
6/20/2016	Sharon Djemal	Opposition to MTD	\$525	8.5	\$ 4,462.50
6/28/2016	Sharon Djemal	Drafted Joint CMC	\$525	0.9	\$ 472.50
7/5/2016	Sharon Djemal	Phone call w/ o/c. Phone call w/ clt	\$525	0.4	\$ 210.00
		Phone call w/ client re offer and names and contact info of			
7/7/2016	Sharon Djemal	witnesses.	\$525	1.1	\$ 577.50
7/8/2016	Sharon Djemal	Initial disclosures	\$525	1.9	\$ 997.50
7/12/2016	Sharon Djemal	Discovery	\$525	2.2	\$ 1,155.00
7/15/2016	Sharon Djemal	Phone call w/ client confirming facts, mtg w/ Eliot	\$525	0.9	\$ 472.50
7/21/2016	Sharon Djemal	Meeting w/ Elliot and clt.	\$525	1.5	\$ 787.50
7/22/2016	Sharon Djemal	Call w/ o/c re offer, records, discovery, etc	\$525	0.3	\$ 157.50

7/26/2016	Sharon Djemal	Finalized and filed Joint CMC	\$525	0.3	\$	157.50
8/4/2016	Sharon Djemal	CMC and MTD Hrg	\$525	1.8	\$	945.00
8/17/2016	Sharon Djemal	Phone call w/ Jessica and next w/ clt re new offer	\$525	0.4	\$	210.00
8/19/2016	Sharon Djemal	Call w/ clt. Re offer, risks, etc.	\$525	0.9	\$	472.50
8/19/2016	Sharon Djemal	Reviewed co-counsel/ retainer. Emailed rates	\$525	0.4	\$	210.00
8/19/2016	Sharon Djemal	Email to o/c re settlement	\$525	0.1	\$	52.50
8/25/2016	Sharon Djemal	Prepared joint scheduling statement and emailed to o/c	\$525	0.6	\$	315.00
8/30/2016	Sharon Djemal	Emailed o/c re Joint Scheduling Conference	\$525	0.1	\$	52.50
8/31/2016	Sharon Djemal	Call w/ Elliot and Bryan; Follow up email w/ o/c	\$525	0.2	\$	105.00
9/7/2016	Sharon Djemal	Call w/ Bryan and Elliot to prep for CMC	\$525	0.1	\$	52.50
9/8/2016	Sharon Djemal	CMC	\$525	1.4	\$	735.00
9/13/2016	Sharon Djemal	Call w/ o/c - conveyed new offer. Client rejected. Told Elliot	\$525	0.3	\$	157.50
9/15/2016	Sharon Djemal	Reviewed amended complaint. Sent Elliot comments.	\$525	0.7	\$	367.50
9/15/2016	Sharon Djemal	Phone call w/ client. Reviewed all facts.	\$525	0.6	\$	315.00
10/2/2016	Sharon Djemal	Meet and Confer	\$525	3.2	\$	1,680.00
10/20/2016	Sharon Djemal	Discovery Responses	\$525	4.6	\$	2,415.00
10/29/2016	Sharon Djemal	Phone call w/ client - for discovery responses	\$525	1.7	\$	892.50
10/31/2016	Sharon Djemal	Reviewed new documents left by client	\$525	0.6	\$	315.00
		Talked to client to arrange discovery review; reviewed docs from				
11/1/2016	Sharon Djemal	Jackie	\$525	1.1	\$	577.50
11/2/2016	Sharon Djemal	Met w/ client to review discovery; Finalized discovery	\$525	4.3	\$	2,257.50
11/15/2016	Sharon Djemal	Opposition to MTD/ Stay	\$525	3.1	\$	1,627.50
11/16/2016	Sharon Djemal	Opposition to MTD/ Stay	\$525	6.3	\$	3,307.50
11/17/2016	Sharon Djemal	Opposition to MTD/ Stay	\$525	5.9	\$	3,097.50
11/29/2016	Sharon Djemal	Reviewed Depo notice. Emailed Elliot	\$525	0.2	\$	105.00
12/6/2016	Sharon Djemal	Reviewed meet and confer. Emailed summary to Elliot and Bryan	\$525	0.9	\$	472.50
12/12/2016	Sharon Djemal	Emailed client re emails from Metro PCS	\$525	0.1	\$	52.50
12/12/2016	Sharon Djemal	Spoke to Elliot and Bryan re meet and confer	\$525	0.2	\$	105.00
		Drafted response to their meet and confer letter and sent to				
12/14/2016	Sharon Djemal	Elliot and Bryan	\$525	2.2	\$	1,155.00
12/15/2016	Sharon Djemal	Edited meet and confer response and returned to co-counsel	\$525	0.4	\$	210.00

12/19/2016	Sharon Djemal	Reviewed responses. Sent notes to co-counsel	\$525	0.5	\$	262.50
12/22/2016	Sharon Djemal	Met and conferred by phone. Drafted summary of call.	\$525	1	\$	525.00
1/6/2017	Sharon Djemal	Met with client to discuss supplemental responses	\$525	1	\$	525.00
1/6/2017	Sharon Djemal	Prepared supplemental interrogatory responses. Emailed to co-counsel	\$525	2.1	\$	1,102.50
1/6/2017	Sharon Djemal	Drafted supplemental responses to RPOD w/ privilege log. Sent to co counsel.	\$525	1.5	\$	787.50
1/9/2017	Sharon Djemal	Careful review of all documents in drive. Redacted everything. Rescanned, reviewed redactions, and email and mailed responses w/ POS	\$525	3.2	\$	1,680.00
10-Jan	Sharon Djemal	Reviewed Sarah's spreadsheets	\$525	1.2	\$	630.00
1/29/2017	Sharon Djemal	Call with o/c re JAMS	\$525	0.3	\$	157.50
1/30/2017	Sharon Djemal	Reviewed research and training manual.	\$525	0.2	\$	105.00
2/9/2017	Sharon Djemal	Emailed co-counsel re training manual	\$525	0.4	\$	210.00
2/10/2017	Sharon Djemal	Emailed co-counsel about disclosures in training manual	\$525	0.2	\$	105.00
2/10/2017	Sharon Djemal	Reviewed documents and emailed Elliot	\$525	0.2	\$	105.00
2/14/2017	Sharon Djemal	Conversation with Professor Hoofnagle	\$525	0.6	\$	315.00
2/15/2017	Sharon Djemal	Depo by phone	\$525	0.8	\$	420.00
2/16/2017	Sharon Djemal	Depo by phone	\$525	5	\$	2,625.00
2/17/2017	Sharon Djemal	Reviewed research and discussed with Sarah	\$525	1.5	\$	787.50
3/8/2017	Sharon Djemal	CMC	\$525	0.3	\$	157.50
3/8/2017	Sharon Djemal	Reviewed second amended complaint, researched single-enterprise doctrine, emailed co-counsel suggested edits	\$525	1.5	\$	787.50
3/13/2017	Sharon Djemal	Reviewed and discussed research with Sarah	\$525	0.6	\$	315.00
3/16/2017	Sharon Djemal	Finalized and emailed meet and confer letter with transcript portions	\$525	1.2	\$	630.00
3/16/2017	Sharon Djemal	Meet and Confer call with Jessica and Jim	\$525	0.5	\$	262.50
3/20/2017	Sharon Djemal	Prepared, emailed and mailed supplemental RPOD responses	\$525	1.2	\$	630.00
3/20/2017	Sharon Djemal	Reviewed and edited and sent discovery to Elliot	\$525	0.9	\$	472.50
3/24/2017	Sharon Djemal	Emailed co-counsel about depo	\$525	0.1	\$	52.50
29-Mar	Sharon Djemal	Emailed Sarah about order re discovery dispute	\$525	0.1	\$	52.50
30-Mar	Sharon Djemal	Reviewed supplemental responses w/ client	\$525	0.3	\$	157.50
4/18/2017	Sharon Djemal		\$525	0.3	\$	157.50



5/24/2017	Sharon Djemal	Listened to recordings, sorted out Cabiness timeline, drafted facts for mediation brief	\$525	3.6	\$ 1,890.00
5/25/2017	Sharon Djemal	Continued to sort out facts with Kara, drafted procedural history, started drafting business model	\$525	2.3	\$ 1,207.50
5/26/2017	Sharon Djemal	Spoke to client about schedule, edited mediation brief and emailed back to co-counsel	\$525	2.7	\$ 1,417.50
5/30/2017	Sharon Djemal	Reviewed mediation brief and sent final comments to Elliot	\$525	0.7	\$ 367.50
5/30/2017	Sharon Djemal	Reviewed meet and confer letter. Sent email to co-counsel with ideas for response	\$525	0.7	\$ 367.50
6/5/2017	Sharon Djemal	Mediation in LA	\$525	12	\$ 6,300.00
6/8/2017	Sharon Djemal	Prepared joint CMS	\$525	0.5	\$ 262.50
10/2/2017	Sharon Djemal	Call with o/c	\$525	0.5	\$ 262.50
10/3/2017	Sharon Djemal	Edited stipulation	\$525	0.1	\$ 52.50
10/30/2017	Sharon Djemal	Call with o/c	\$525	0.5	\$ 262.50
12/15/2017	Sharon Djemal	Prepared and filed notice of change of address	\$525	0.5	\$ 262.50
12/20/2017	Sharon Djemal	Reviewed settlement agreement and release	\$525	0.7	\$ 367.50
12/24/2017	Sharon Djemal	Motion for Preliminary Approval	\$525	2.5	\$ 1,312.50
12/28/2017	Sharon Djemal	Motion for Preliminary Approval	\$525	4.7	\$ 2,467.50
12/29/2017	Sharon Djemal	Motion for Preliminary Approval	\$525	5.2	\$ 2,730.00
12/31/2017	Sharon Djemal	Motion for Preliminary Approval	\$525	3.2	\$ 1,680.00
1/1/2018	Sharon Djemal	Motion for Preliminary Approval	\$525	5.3	\$ 2,782.50
1/2/2018	Sharon Djemal	Motion for Preliminary Approval	\$525	4.5	\$ 2,362.50
6/25/2015	Sharon Djemal	Discussed Case with Lauren	\$525	0.1	\$ 52.50
7/16/2015	Sharon Djemal	Discussed TCPA Research with Lauren	\$525	0.4	\$ 210.00
7/17/2015	Sharon Djemal	Researched TCPA	\$525	2.7	\$ 1,417.50
8/12/2015	Sharon Djemal	Reviewed and edited timeline, notes, and docs	\$525	0.7	\$ 367.50
1/31/2016	Sharon Djemal	Researched TCPA, reviewed file and notes	\$525	1.3	\$ 682.50
6/2/2016	Sharon Djemal	Spoke to subpoena compliance officer.	\$525	0.2	\$ 105.00
6/10/2016	Sharon Djemal	Spoke to client about consent and contract	\$525	0.2	\$ 105.00
6/11/2016	Sharon Djemal	Call with client about meeting	\$525	0.2	\$ 105.00
1/11/2018	Sharon Djemal	Reviewed Motion and Declaration	\$525	0.9	\$ 472.50
1/16/2018	Sharon Djemal	Phone call w/ former student re strategy	\$525	0.2	\$ 105.00

1/17/2018	Sharon Djemal	Reviewed agreements. Phone call with c/c and o/c	\$525	2.4	\$ 1,260.00
1/18/2018	Sharon Djemal	Final edits to motion and dec.	\$525	0.7	\$ 367.50
1/22/2018	Sharon Djemal	Phone call w/ student	\$525	0.2	\$ 105.00
1/23/2018	Sharon Djemal	Edited long form notice	\$525	0.6	\$ 315.00
1/25/2018	Sharon Djemal	Phone call with Cabiness about settlement	\$525	0.3	\$ 157.50
1/26/2018	Sharon Djemal	Meeting w/ Cabiness to review and sign agreement	\$525	1.2	\$ 630.00
9/5/2018	Sharon Djemal	Fee Declaration	\$525	3.1	\$ 1,627.50
6/9/2016	Tong Jin	Phone calls w/ Metro PCS, One Hour, Faxed evidence, etc.	\$100	0.5	\$ 50.00
6/14/2016	Tong Jin	Email exchange w/ Metro PCS	\$100	0.2	\$ 20.00
7/22/2016	Tong Jin	Drafted Joint CMC	\$100	1.2	\$ 120.00
6/10/2016	Tong Jin	Met and Conferred with Sharon	\$100	0.3	\$ 30.00
6/21/2016	Tong Jin	Phone call w/ Metro PCS	\$100	0.2	\$ 20.00
6/20/2016	Tong Jin	Filed opposition and declaration	\$100	0.5	\$ 50.00

Name	Hours
Daniel Contreras	13.5
Jackie Zaneri	35.2
Lauren Freeman	9.30
Luke Diamond	18.5
Robin Wetherill	9.5
Sarah Mullins	40.1
Sharon Djemal	198
Tong Jin	2.9
<b>TOTAL Hours</b>	<b>327</b>