

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:

Jeremiah F. Jones
Teri Denice Mayers

Debtors.

Case Nos. (respectively)

18-06304-dd, Chapter 7
14-00864-dd, Chapter 7

Jeremiah Jones and Teri Denice Mayers,
individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

Lexington Health Services District, Inc.
d/b/a Lexington Medical Center,

Defendant.

Adv. Pro. No. 20-80002-dd

**PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, and
NAMED PLAINTIFF SERVICE
AWARDS**

Pursuant to Rule 7023 of the Federal Rules of Bankruptcy Procedure and Rule 23 of the Federal Rules of Civil Procedure, Plaintiffs Jeremiah Jones and Teri Denice Mayers ("Plaintiffs"), by and through their counsel, respectfully move the Court to approve the requested awards of:

1. Attorneys' fees and costs of \$170,000 to be paid by Defendant, separately from the Settlement Fund; and
2. Named Plaintiff Service Awards of \$4,000 to each of the two Named Plaintiffs, to be paid from the Settlement Fund.

This Motion also seeks approval to reimburse the Settlement Administrator for its expenses from the Settlement Fund, the total of which is estimated to be \$10,886.

Defendant Lexington Health Services District, Inc. d/b/a Lexington Medical Center does not oppose the requested amounts.

Plaintiffs' Motion is based upon the pleadings, files, records, and proceedings in this case, Plaintiffs' Memorandum of Law in support, and the Declarations of Joseph C. Hashmall and David Maxfield. This Motion is to be decided at the Final Fairness Hearing, along with the forthcoming Motion for Final Settlement Approval.

Respectfully submitted,

DAVE MAXFIELD, ATTORNEY, LLC

Dated: January 21, 2022

/s/Dave Maxfield

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

Respectfully submitted,

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**MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS'
FEES, COSTS, AND NAMED PLAINTIFF SERVICE AWARDS**

Plaintiffs and Class Counsel have diligently litigated this action for two years, entirely on a contingent fee basis, with their efforts resulting in a settlement that establishes a common fund of \$110,000 from which the 172 Settlement Class Members will automatically receive a payment. Even with requested reductions for class representative incentive awards and reimbursement of the settlement administrator, the Class will still receive a recovery which is significantly *greater than* the amount (roughly \$77,000) Plaintiffs allege was wrongly seized from the Settlement Class. The settlement was achieved despite significant hurdles to recovery. The benefits to the Settlement Class could not have been attained absent Class Counsel's time, effort, and skill, as well as the Named Plaintiffs' active participation in the case. The requested attorneys' fees and costs of

\$170,000 are reasonable in light of Class Counsel's lodestar to date, which significantly exceeds the requested fees even before out-of-pocket costs are considered. Fees were negotiated only after relief for the Class was agreed and the amount of attorneys' fees is separate from and in addition to the amount the settlement provides for Class Members' relief. The attorneys' fees awarded will therefore not reduce the common fund. Class Counsel have received no payment or reimbursement to date for their efforts.

Further, the requested service awards of \$4,000 for each of the two Named Plaintiffs, which are requested to be paid from the common fund, are appropriate in light of their investment of time and energy in this litigation. The amounts requested to be paid to the Settlement Administrator are also reasonable in light of services performed.

No class member has objected to the requested attorneys' fees and costs, to the requested incentive awards, or to the amounts requested for the settlement administrator.

BACKGROUND

The litigation history, history of settlement negotiations, and terms of the settlement are set forth in detail in the Memorandum in Support of Plaintiffs' Motion for Preliminary Settlement Approval (ECF No. 60-1) and are incorporated by reference here. This Memorandum will focus on the efforts of Class Counsel and the Named Plaintiffs to achieve the significant result in this case, and on the pertinent portions of the settlement negotiations.

I. Class Counsel's Experience & Efforts to Secure Benefits for the Class.

Class Counsel invested substantial time and resources investigating, litigating, and settling this action. Class Counsel's efforts include:

- Researching and drafting the Adversary Complaint;
- Researching, briefing, arguing, and defeating Defendant's Motion to Dismiss;

- Researching, and fully briefing Plaintiffs' Motion for Class Certification;
- Propounding multiple sets of written discovery requests to Defendant, and reviewing documents and data produced by Defendant;
- Preparing the Named Plaintiffs' written responses to Defendant's requests to each, and coordinating production of relevant documents;
- Taking the 30(b)(6) deposition of Defendant;
- Preparing Plaintiffs for, and defending, their depositions;
- Engaging in lengthy, arms-length negotiations;
- Drafting the Settlement Agreement and Exhibits;
- Researching, drafting the preliminary approval motion; and
- Coordinating and overseeing administration of the settlement.

(Declaration of Joseph C. Hashmall ("Hashmall Decl.") ¶ 2.)

Class Counsel have devoted 526.48 hours to this matter, resulting in \$276,833.50 in lodestar. (*Id.* ¶ 3; Declaration of David Maxfield ("Maxfield Decl.") ¶ 2.) And the work is not yet complete. Anticipated future tasks include continuing to oversee the administration of the settlement, researching and drafting final approval papers, and preparing and arguing at the final fairness hearing. (Hashmall Decl. ¶ 4.) To date, Class Counsel have also incurred \$3,657.49 in out-of-pocket litigation costs. (*Id.* ¶ 3; Maxfield Decl. ¶ 2.) All of these costs were necessarily incurred and are of the type typically reimbursed by paying clients. (*Id.*) Notably, Class Counsel are not requesting reimbursement for these costs in addition to fees, instead requesting the \$170,000 to account for both fees and costs.

The requested attorneys' fees and costs amount was identified in the Notices sent out to Settlement Class Members. No objections have been received to date.

II. Class Representatives' Participation in the Case.

The Named Plaintiffs played a valuable and active role in this litigation, and devoted significant time and attention to the case. Both responded to written discovery requests, produced documents, and prepared and sat for their depositions. Additionally, the Named Plaintiffs assisted Class Counsel with investigation of the facts, consulted with Class Counsel throughout litigation and during settlement negotiations, and reviewed and approved the Settlement Agreement. (Hashmall Decl. ¶ 5.) The Settlement Agreement's provision for the request of up to \$4,000 for each reflects the Named Plaintiffs' initiative in pursuing this action and the time and resources they have invested.

The contemplated Class Representative payments were listed in the Notices sent to the Settlement Class, and no objections have been received to date.

III. Settlement Administration Expenses.

With this motion, Plaintiffs also seek approval to reimburse the Settlement Administrator for its expenses from the common fund. American Legal Claim Services LLC, the appointed Settlement Administrator, estimates those expenses to be \$10,886, through the end of administration (i.e., through payments to Class Members and the passing of the negotiation period for those payments). These expenses to date are for the preparation and mailing of Notice to the Settlement Class, the implementation and maintenance of the Settlement Website, tracking of opt outs and contact information updates, and conducting remailings of Notice as appropriate. Should final approval be granted, the Administrator will incur expenses for the establishment of the common fund, preparation and mailing of payments to Class Members, tracking of check cashing and reissuing as necessary, and the potential redistribution of remaining funds as appropriate. Settlement Class Members were informed in the Notices that the Settlement Administrator's

expenses would be sought to be reimbursed from the common fund, and no objections have been received to date.

ARGUMENT

I. Class Counsel’s Request for Attorneys’ Fees & Costs is Reasonable.

Class Counsel seek an award of \$170,000 in attorneys’ fees and costs, to be paid separately from the common fund established for the Settlement Class. This request should be granted because of the significant efforts of Class Counsel, which resulted in exceptional relief for the class in a novel legal context. Importantly, because this fee is paid separately from the common fund, granting this request will not reduce Class Members’ recovery.

In a certified class action, a court “may award reasonable attorney’s fees and nontaxable costs that are authorized by law or by the parties’ agreement.” Fed. R. Civ. P. 23(h).¹ In reviewing attorneys’ fees in bankruptcy cases, courts in this Circuit “begin[] with the ‘[l]odestar’ principles.” *In re Sussex Title, LLC*, No. 07-22878, 2010 WL 3810011, *1 (Bankr. D. Md. Sept. 22, 2010). This consideration includes review of several factors, including: (1) the time and labor expended, (2) the novelty and difficulty of the questions, (3) the level of skill required, (4) the preclusion of other employment by the attorney due to acceptance of the case, (5) the customary fee for similar work in the community, (6) whether the fee is fixed or contingent, (7) time limitations imposed by the client or the circumstances, (8) the amount involved and results obtained, (9) the experience, reputation and ability of the attorneys, (10) the undesirability of the case, (11) the nature and length of the professional relationship with the client,² and (12) fee awards in similar cases. *Barber v.*

¹ “Rule 23 F.R. Civ. P. applies in adversary proceedings.” Fed. R. Bkrptcy. Pro. 7023.

² Factor (11) is neutral here, as the relationship between Class Counsel and the Named Plaintiffs was solely for the purposes of this litigation, and thus has no further bearing on the reasonableness of the fees sought here. *See, e.g., Reynolds v. Fidelity Investments Institutional Operations Company, Inc.*, No. 18-423, 2020 WL 92092, *4 (M.D.N.C. Jan. 8, 2020) (“Factor 11, the nature

Kimbrell's, Inc., 577 F.2d 216, 226 (4th Cir. 1978) (adopting the 12 factors laid out in *Johnson v. Georgia Hwy. Express, Inc.*, 488 F.2d 714, 717-720 (1974) for use by Fourth Circuit courts for “determination[s] of reasonable attorneys’ fees”).

Here, Class Counsel’s lodestar represented by the number of hours expended on the litigation, 526.48, multiplied by each timekeeper’s respective hourly rates, results in a lodestar of \$276,833.50. That is, Class Counsel are requesting significantly *less* than their lodestar in his case, a factor that strongly supports the requested award.

A. Class Counsel’s Efforts Achieved an Excellent Result for the Settlement Class.³

In the Fourth Circuit, when determining “what fee is reasonable, the ‘most critical factor’ in that determination ‘is the degree of success obtained.’” *Doe v. Chao*, 435 F.3d 492, 505 (4th Cir. 2006) (quoting *Hensley v. Eckerhart*, 461 U.S. 424, 436 (1983)). The settlement in this case provides monetary relief that totals *more than* the actual amounts alleged to have been improperly collected by Defendant from the Settlement Class. Class Members automatically benefit from the settlement, without having to return a claim form, and their individual amounts will be directly proportionate to (and *greater than*) the amounts Defendant collected from each. (ECF No. 60-2 ¶ 34.) Class Counsel consider this to be an exceptional result for the Class.

The settlement was reached only after Class Counsel successfully defeated Defendant’s motion to dismiss, conducted extensive discovery, fully briefed class certification, and the

and length of the attorneys’ relationship with the client, is inconsequential given the one-time relationship present here.”); *Price v. City of Fayetteville, N.C.*, No. 13-150, 2015 WL 1222168, *6 (E.D.N.C. March 17, 2015) (“Plaintiffs’ attorneys have not attested to any prior professional relationship with their clients. Neither party proposes consideration of this factor as bearing on the lodestar figure in this case. Accordingly, the court finds this factor to be inconsequential.”).

³ This section incorporates the following Fourth Circuit factors (*see Barber*, 577 F.2d at 216): (3) the level of skill required, (8) the amount involved and results obtained, (9) the experience, reputation and ability of the attorneys.

subsequent arms-length settlement negotiations spanning several months. (Hashmall Decl. ¶ 6.) The settlement provides certain monetary benefits to the Class Members, which is enhanced by the fact that they will receive those benefits promptly, without the delay and risks of further litigation. This is especially important in this case, as the Settlement Class Members, by definition, are consumers who have medical debt and were in personal bankruptcy.

Class Counsel have provided declarations previously in this matter, detailing their extensive class action and consumer protection experience. (See ECF Nos. 50-4, 50-7.) This significant experience provided the Settlement Class with the representation necessary to successfully litigate and resolve this matter, and to do so efficiently, resolving the action two years from its inception. See *Singleton v. Domino's Pizza, LLC*, 976 F. Supp. 2d 665, 683 (D Md. 2013) (finding that reaching settlement after discovery, but within two years of complaint filing, was indicative of class counsel's "skills and efficiency").

B. Class Counsel Took Significant Risks and Overcame Obstacles in this Case.⁴

"Class Counsel took this case on a contingency basis and understood from the outset that there would be no attorneys' fee without a recovery for the Plaintiffs or the Class. They have worked for years with no payment on this litigation, [] undertaking the risk of walking away with no payment at all. Moreover, Class Counsel could have lost their entire investment in out-of-pocket expenses []. Such burdens are relevant circumstances that support the requested award." *In re LandAmerica 1031 Exchange Services, Inc. I.R.S. 1031 Tax Deferred Exchange Litig.*, MDL No. 2054, 2012 WL 5430841, *5 (D.S.C. Nov. 7, 2012) (internal quotation omitted). These same

⁴ This section incorporates the following *Barber* factors: (2) the novelty and difficulty of the questions, (4) the preclusion of other employment by the attorney due to acceptance of the case, (6) whether the fee is fixed or contingent, (7) time limitations imposed by the client or the circumstances, (10) the undesirability of the case.

circumstances were certainly present here, where Class Counsel faced the very real risk of non-payment, navigating an adversary putative class action, against a large healthcare organization, for unique claims involving an interplay of bankruptcy rules and state statutes, all on a contingency fee basis. This was a novel cause of action, and Counsel is aware of no directly analogous actions previously filed. The novelty of this claim supports a finding that there were real risks to this litigation.

The Fourth Circuit acknowledges the risks inherent in a contingent fee arrangement for attorneys, and considers it as weighing in favor of finding reasonableness in attorneys' fees. *In re Abrams & Abrams, P.A.*, 605 F.3d 238, 245-6 (4th Cir. 2010). Additionally, the claims at issue here were unique and complex, especially presented through an adversary putative class action. Class actions are not a guaranteed mechanism, particularly in bankruptcy court. *See, e.g., Sprint Commc'ns Co., L.P. v. APCC Services, Inc.*, 554 U.S. 269, 291 (2008) ("class actions are permissive, not mandatory"); *In re Computer Learning Ctrs., Inc.*, 344 B.R. 79, 92 (Bankr. E.D. Va. 2006) (holding in bankruptcy case that a class action was not the superior method of adjudication, stating "[a] bankruptcy case presents many of the same mechanisms to process large numbers of claims as a class action."). If class certification were to have been denied, given the nature of the claims, the Settlement Class Members would likely have received no relief at all. *In re TD Bank, N.A. Debit Card Overdraft Fee Litig.*, 325 F.R.D. 136, 162 (D.S.C. 2018) (in consumer protection actions such as this one, "the only realistic alternative to a class action is no action at all"). Taken with the contingent nature of Class Counsel's representation, no action would mean no fees or costs recovery.

It is difficult to find lawyers to take on risky consumer cases like this case. "The difficult and contingent nature of this case [] demonstrates its undesirability. [] [T]here are few lawyers

willing to invest significant time and resources prosecuting a lawsuit that involves complicated and uncertain legal questions and a substantial risk of receiving no compensation.” *In re Allura Fiber Cement Siding Litig.*, No. 19-2886, 2021 WL 2043531, *6 (D.S.C. May 21, 2021). The Court should award the requested fees because “[t]he type of litigation undertaken by [C]lass [C]ounsel here, which addresses important consumer concerns that would likely be ignored without such class action lawsuits, must be encouraged.” *Perry v. FleetBoston Fin. Corp.*, 229 F.R.D. 105, 123 (E.D. Pa. 2005). Without adequate incentives for attorneys to take on small value cases, “[P]laintiff[s] would have faced substantial difficulties in finding counsel in the local or other relevant market.” *Pennsylvania v. Delaware Valley Citizens’ Council for Clean Air*, 483 U.S. 711, 731 (1987). To ensure qualified and talented attorneys continue to take on these important cases, courts should compensate them appropriately for the numerous risks involved. *Jones v. Dominion Res. Servs., Inc.*, 601 F. Supp. 2d 756, 765 (S.D. W. Va. 2009) (“[P]ublic policy generally favors attorneys’ fees that will induce attorneys to act and protect individuals who may not be able to act for themselves.”).

C. The Requested Fees and Costs Amount is Reasonable in Light of Counsel’s Lodestar, and Fees Awarded in Comparable Cases.⁵

Class Counsel seek \$170,000 as attorneys’ fees and costs, separate from and in addition to the \$110,000 common fund established for the Settlement Class. Under the lodestar method, it is common that fees will exceed any recovery, indeed that is one of the purposes of a fee-shifting statute.⁶ *See Millea v. Metro-N. R. Co.*, 658 F.3d 154, 169 (2d Cir. 2011) (“Especially for claims

⁵ This section incorporates *Barber* factors of (1) the time and labor expended, (5) the customary fee for similar work in the community, (12) fee awards in similar cases.

⁶ Plaintiffs brought claims of violations of bankruptcy stays under 11 U.S.C. § 362(k)(1) which has a fee shifting provision (“an individual injured by any willful violation of a stay provided by this section shall recover actual damages, including costs and attorneys’ fees”). *See also In re Schwartz-Tallard*, 803 F.3d 1095, 1100 (9th Cir. 2015) (en banc) (holding attorneys’ fee awards

where the financial recovery is likely to be small, calculating attorneys' fees as a proportion of damages runs directly contrary to the purpose of fee-shifting statutes: assuring that civil rights claims of modest cash value can attract competent counsel. The whole purpose of fee-shifting statutes is to generate attorneys' fees that are disproportionate to the plaintiff's recovery."); *Phenow v. Johnson, Rodenberg & Lauinger, PLLP*, 766 F. Supp. 2d 955, 959 (D. Minn. 2011) ("[T]he amount of attorney fees need not be proportionate to the amount of damages recovered when Congress sets up a statutory scheme, such as this one, that provides for [] fee shifting."); *In re Gonzalez*, No. 12-BK-19213, 2019 WL 1087093, at *9 (Bankr. M.D. Fla. Mar. 5, 2019) ("Non-reciprocal, fee-shifting provisions in consumer protection statutes are designed to encourage counsel to take on small consumer cases. The statutes not only protect consumers from predatory [businesses], but they also protect law abiding [businesses] from commercial disadvantage.").

Indeed, in settlements involving fee shifting, it is routine for the amount paid in attorneys' fees to exceed the amount allocated to the class. *Oslan v. Law Offices Of Mitchell N. Kay*, 232 F. Supp. 2d 436, 444 (E.D. Pa. 2002) (awarding fee of \$55,000 when class received \$20,000); *King v. United SA Fed. Credit Union*, 744 F. Supp. 2d 607, 616 (W.D. Tex. 2010) (noting that "[t]he fact that the \$100.00 to be distributed to each individual Class member may not be a great sum in relation to counsel's fee request does not make that request unreasonable"); *Sheffer v. Experian Info. Solutions*, 290 F. Supp. 2d 538, 550-51 (E.D. Pa. 2003) ("proportionality analysis between the amount of damages awarded and the amount of counsel fees requested ... is an impermissible basis upon which to reduce a fee award"); *Hallmark v. Cohen & Slamowitz, LLP*, 378 F. Supp. 3d

allowable in 362(k) cases); *In re Repine*, 536 F.3d 512, 522 (5th Cir. 2008) (agreeing with decisions that award attorneys' fees incurred in prosecuting claims of automatic stay violations). In these matters, it is also advisable that, like here, the attorneys' fee award is separate from any other recovery. *In re Repine*, 536 F.3d at 522; *In re DUBY*, 451 B.R. 664, 674-77 (1st Cir. 2011); *In re Schwartz-Tallard*, 803 F.3d at 1097.

222, 234 (W.D.N.Y. 2019) (awarding fees that were twice the size of the settlement fund). This is true also in bankruptcy cases specifically. *See, e.g., In re Eppolito*, 583 B.R. 822, 829 (Bankr. S.D.N.Y. 2018) (awarding \$9,065.00 in legal fees and \$69.91 in disbursements for violation of the discharge injunction, pursuant to 11 U.S.C. § 105); *In re Biery*, No. 10-23338, E.D. Ky. (2017). “Disproportion alone does not make an award of attorney fees excessive.” *Mitchell v. BankIllinois*, 316 B.R. 891, 903 (S.D. Tex. 2004) (citing *Northwinds Abatement, Inc. v. Employers Ins. of Wausau*, 258 F.3d 345, 354-5 (5th Cir. 2001) in support, where award of attorney fees that was three times the size of trebled damages award was affirmed).

The reasonableness of the requested award is further supported here, where Class Counsel are not seeking a multiplier of their lodestar, despite their successful efforts on behalf of the Class, achieved on a contingency basis, and instead are taking a discount on their incurred lodestar. NEWBERG ON CLASS ACTIONS, 3d §14.03 at 14-4 to 14-5 (“Courts applying the lodestar approach will often use large multipliers or monetary enhancements of the time/rate (lodestar) calculation in order to reach fee award results comparable to percentage of recovery fees.”); *see also In re Allura Fiber Cement Siding Litig.*, 2021 WL 2043531 at *7 (“in comparable complex cases, attorneys are often not just awarded their lodestar, but a multiple thereof”) (citing *DeWitt v. Darlington Cnty., S.C.*, No. 11-740, 2013 WL 6408371, *13 (D.S.C. Dec. 6, 2013)); *Kay Co. v. Equitable Prod. Co.*, 749 F. Supp. 2d 455, 470 (S.D. W. Va. 2010 (multipliers falling between 2 and 4.5 are reasonable). Class Counsel’s lodestar, determined by the hours expended, 526.48, multiplied against the timekeepers’ hourly rates, is \$276,833.50, an amount almost two times the amount sought for fees here. “The figure arrived at using this calculation is presumed to be a reasonable fee.” *In re Brier Creek Corp. Ctr. Assoc., Ltd. P’ship*, No. 12-1855, 2013 WL 2352570, *1 (Bankr. E.D.N.C. May 29, 2013) (citing *Perdue v. Kenny A. ex rel. Winn*, 130 S.Ct. 1662, 1667

(2010) (for stating that the presumption is a “strong” one) (internal quotation omitted). Thus, by seeking *less* than their lodestar versus the enhancement they could have argued for, the reasonableness of the amount is unquestionable. *See Brown v. Transurban USA, Inc.*, 318 F.R.D. 560, 578 (E.D. Va. 2016) (finding fees that were less than class counsel’s lodestar to be reasonable).

Moreover, the hours expended, as illustrated by the fee entries filed with Class Counsel’s declarations here, were properly spent furthering the litigation, and ultimately the settlement, of this matter. (Hashmall Decl. ¶ 3, Ex. A; Maxfield Decl. ¶ 2, Ex. 1.) While counsel should “exercise billing judgment with respect to hours worked,” “a request for attorney’s fees should not result in a second major litigation.” *Hensley v. Eckerhart*, 461 U.S. 424, 437 (1983) (internal quotation omitted). To assist the Court in this review, it is important to “focus on the significance of the overall relief obtained by the plaintiff in relation to the hours reasonably expended on the litigation.” *Id.* at 465. The hours spent by Class Counsel here illustrate their successful efforts on behalf of the Settlement Class – defeating the motion to dismiss, propounding significant discovery, and ultimately negotiating this certain monetary relief for the Class Members, which exceeds the amounts taken from them by Defendant’s conduct.

Further, the timekeepers’ rates used to determine lodestar are in line with those approved in this Circuit for similar national class action attorneys. The Fourth Circuit Court of Appeals has recognized that “where it is reasonable to retain attorneys from other communities, ... the rates in those communities may also be considered,” particularly “when the complexity and specialized nature of a case may mean that no attorney, with the required skills, is available locally.” *Rum Creek Coal Sales, Inc. v. Caperton*, 31 F.3d 169, 175, 179 (4th Cir. 1994). Here, Class Counsel, who are not traditionally bankruptcy attorneys, brought their extensive consumer protection class

action experience to bear here, and utilized their noteworthy firm resources, which ultimately led to the successful result for the Class.⁷ Lead Counsel from Berger Montague, while based in Minnesota, maintain a national class action practice and the attorneys who worked on this case have extensive class action experience which benefited the Class. Thus, the “reasonable” hourly rate standard for Class Counsel here is “the prevailing market rates in the relevant community,” *Blum v. Stenson*, 465 U.S. 886, 895 (1984), which is the national class action legal community. *See, e.g., In re Allura Fiber Cement Siding Litig.*, 2021 WL 2043531, *6 (“these rates are consistent with those for complex class action attorneys operating on a contingency-basis”).

Class Counsel’s rates, as outlined in the supporting declarations, range from \$525 – 890 for attorneys, and \$220-370 for legal staff. (Hashmall Decl. ¶ 7; Maxfield Decl. ¶ 3.) These rates are appropriate. *See, e.g., In re Sussex Title, LLC*, 2010 WL 381011, *1 (approving hourly rates from \$245-\$550 in bankruptcy litigation); *Clark v. Duke Univ.*, No. 1:16-CV-1044, 2019 WL 2579201, at *4 (M.D.N.C. June 24, 2019) (in class action for attorneys with nationwide practice, approving hourly rates of \$1,060 per hour for attorneys with over 25 years of experience, \$900 per hour for attorneys with 15 to 24 years of experience, \$650 per hour for attorneys with 5 to 14 years of experience, \$490 per hour for attorneys with 2–4 years of experience, and \$330 per hour for attorneys with less than 2 years of experience, law clerks, and paralegals); *Phillips v. Triad Guar. Inc.*, No. 1:09CV71, 2016 WL 2636289, at *7 (M.D.N.C. May 9, 2016) (approving hourly rates up to \$880 per hour); *In re Mercedes-Benz Tele Aid Contract Litig.*, No. 07-2720, 2011 WL

⁷ “The ability to retain top-quality representation in bankruptcy is precisely why Congress shifted the policy [with the passing of the Bankruptcy Reform Act of 1978] underlying the compensation of bankruptcy professionals to one where the free market plays a larger role.” This reasoning “support[s] Counsel’s ability to charge higher hourly rates. . . . In short, allowing Counsel to charge fees commensurate with the value of their services enables debtors to choose and retain extremely competent legal representation.” *In re Brier Creek*, 2013 WL 2352570, **4-5.

4020862, at *7 (D.N.J. Sept. 9, 2011) (finding reasonable, in consumer class action settlement, hourly rates up to \$855 for partners and up to \$560 for associates); *Flores v. Express Servs., Inc.*, No. 14-3298, 2017 WL 1177098, at *4 (E.D. Pa. Mar. 30, 2017) (finding hourly rates for attorneys ranging from \$725 to \$225 reasonable in consumer class settlement); *Chakejian v. Equifax Info. Servs., LLC*, 275 F.R.D. 201, 216–17 (E.D. Pa. 2011) (finding hourly rates up to \$700 for partners and \$175 for paralegals are reasonable for experienced class counsel in a consumer class action); *Brown*, 318 F.R.D. at 576 (collecting authority on reasonable hourly rates); *see also* Laffey Matrix, <http://www.laffeymatrix.com/see.html> (setting forth rates between \$343 and \$826 for attorneys of similar experience levels).⁸

II. The Class Representative Service Awards are Appropriate.

Plaintiffs request Class Representative Service Awards of \$4,000 for each of the two Named Plaintiffs, to be paid from the common fund. “To determine whether an incentive payment is warranted, it is appropriate to consider ‘the actions the plaintiff has taken to protect the interests of the class, the degree to which the class has benefitted from those actions, and the amount of time and effort the plaintiff expended in pursuing the litigation.’” *Edelen v. Am. Res. Servs., LLC*, No. 11-2744, 2013 WL 3816986, at *16 (D. Md. July 22, 2013) (citing *Hoffman v. First Student, Inc.*, No. 06-1882, 2010 WL 1176641, at *3 (D Md. Mar. 23, 2010)).

Here, the Named Plaintiffs agreed to serve as class representatives on behalf of the absent class members, with full understanding of the responsibilities of that role. They invested significant time and effort into the case, including keeping informed of its status, reviewing documents provided by Class Counsel, responding to discovery, providing documents for

⁸ *In re Allura Fiber Cement Siding Litig.*, 2021 WL 2043531, *6 (“Courts in the Fourth Circuit have previously determined that using Laffey and Adjusted Laffey rates is appropriate when reviewing lodestar in approving fee petitions.”) (collecting cases).

production, preparing for and sitting for their depositions, and staying informed during settlement negotiations. (*See generally* ECF Nos. 50-8, 50-9; Hashmall Decl. ¶ 5.) Under these circumstances, a service award is appropriate, and the requested amount is reasonable. *See, e.g., In re Cotton*, 2019 WL 1233740, *4 (awarding \$10,000 service awards to each named plaintiff in bankruptcy adversary consumer class action); *Smith v. Res-Care, Inc.*, No. 13-5211, 2015 WL 6479658, at *9–10 (S.D. W.Va. Oct. 27, 2015) (awarding \$7,500 service award to named plaintiff in consumer class action, where plaintiff participated in discovery and was responsive with counsel, and finding the award to be “fair and appropriate”); *Mullinax v. Parker Sewer & Fire Subdistrict*, No. 12-1405, 2014 WL 12774925, *14 (D.S.C. March 11, 2014) (awarding \$5,000 to lead plaintiff); *Berry v. Schulman*, 807 F.3d 600, 613-614 (4th Cir. 2015) (upholding district court’s approval of \$5,000 service awards as appropriate in consumer protection case, as the “Class Representatives acted for the benefit of the class, and [the district court] cited other cases in which district courts in our circuit have ordered similarly substantial payments.”); *see also* Manual for Complex Litig. § 21.62 n. 971 (4th ed. 2004) (such awards “merited for time spent . . . responding to discovery”).

Indeed, the purpose of class representative service awards is not to compensate the named plaintiffs for the harm caused by the defendant but, rather, to fairly reward them for the time and effort they invested in the case and spent on behalf of the class. *See Berry v. LexisNexis Risk & Info. Analytics Grp., Inc.*, 807 F.3d 600, 613 (4th Cir. 2015) *cert denied* 137 S.Ct. 77 (2016) (instructing that service awards “are intended to compensate class representatives for work done on behalf of the class, to make up for financial or reputational risk undertaken in bringing the action, and, sometimes, to recognize their willingness to act as a private attorney general.”). Plaintiffs properly earned their proposed service awards through their participation in the case.

The Court should therefore approve the Plaintiffs' request for the two \$4,000 Class Representative Service Awards, to be paid from the common fund that they helped secure for the Class.

III. The Settlement Administrator's Expenses Should be Reimbursed from the Fund.

American Legal Claim Services has been serving as the Settlement Administrator in this matter since preliminary approval was granted and reasonably expects its costs through settlement distribution to total \$10,886. These costs include preparing and mailing notice to the Class Members, establishing and maintaining the Settlement Website, updating Class Member contact information, tracking and reviewing opt outs, and class member contact information updates, and should final approval be granted, issuing and mailing payments to the Class Members. (Hashmall Decl. ¶ 8.) These expenses were or will be necessarily incurred and should be paid from the common fund. "The[] costs of paying the claims administrator, processing the claims, providing notice to the class, and generally administering the settlement is typically deducted from the settlement fund." NEWBERG ON CLASS ACTIONS § 12.20 (5th ed.); *see also* *McDaniels v. Westlake Servs., LLC*, No. 11-1837, 2014 WL 556288, at *15 (D. Md. Feb. 7, 2014) (awarding costs of notice and administration to claims administrator); *Singleton*, 976 F. Supp. 2d at 690 (same).

CONCLUSION

Based on the foregoing, the Court should award the requested attorneys' fees and costs award of \$170,000, to be paid separately by Defendant and the Class Representative Service Awards of \$4,000 to each Named Plaintiff, which along with the Settlement Administrator's expenses, to be paid from the common fund.

Date: January 21, 2022

Respectfully submitted,

BERGER MONTAGUE PC

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Counsel for Plaintiffs & the Class

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE: Jeremiah F. Jones Teri Denice Mayers Debtors.	Case Nos. (respectively) 18-06304-dd, Chapter 7 14-00864-dd, Chapter 7
Jeremiah Jones and Teri Denice Mayers, individually and on behalf of all others similarly situated, Plaintiffs, vs. Lexington Health Services District, Inc. d/b/a Lexington Medical Center, Defendant.	Adv. Pro. No. 20-80002-dd <u>DECLARATION OF JOSEPH HASHMALL</u>

I, Joseph Hashmall, hereby declare as follows:

1. I am one of Class Counsel in the above-captioned matter. I submit this Declaration in support of Plaintiffs' Motion for Attorneys' Fees, Costs, and Named Plaintiff Service Awards.
2. Class Counsel have invested substantial time and resources investigating, litigating, and settling this action. Class Counsel's efforts include researching and drafting the Adversary Complaint; researching, briefing, arguing, and defeating Defendant's Motion to Dismiss; researching, and fully briefing Plaintiffs' Motion for Class Certification; propounding multiple sets of written discovery requests to Defendant, and reviewing documents and data produced by Defendant; preparing the Named Plaintiffs' written responses to Defendant's requests to each, and coordinating production of relevant documents; taking the 30(b)(6) deposition of Defendant; preparing Plaintiffs for, and defending, their depositions; engaging in lengthy, arms-length

negotiations; drafting the Settlement Agreement and Exhibits; researching, drafting the preliminary approval motion; and coordinating and overseeing administration of the settlement.

3. My firm has expended 480.2 hours on this matter, resulting in \$254,293 in lodestar. The entries for these hours, redacted for privilege, are attached hereto as **Exhibit A**. Additionally, my firm has incurred \$2,807.49 in out-of-pocket costs to date, the entries for which are attached hereto as **Exhibit B**.

4. Class Counsel’s work will continue after this motion, including continuing to oversee the administration of the settlement, researching and drafting final approval papers, and preparing and arguing at the final fairness hearing.

5. The Named Plaintiffs assisted Class Counsel with investigation of the facts, consulted with Class Counsel throughout litigation and during settlement negotiations, and reviewed and approved the Settlement Agreement.

6. The settlement was reached only after Class Counsel successfully defeated Defendant’s motion to dismiss, conducted extensive discovery, fully briefed class certification, and the subsequent arms-length settlement negotiations spanning several months.

7. A chart of my firm’s timekeepers on this matter, with positions, attorney years of experience and hourly rates is as follows:

Timekeeper	Position	Attorney Yrs. of Experience	Hourly Rate	Hours Worked	Lodestar
Hashmall, Joseph C	Senior Counsel	13	\$550.00	291.1	\$160,105.00
Xiong, Mai	Paralegal		\$310.00	68.4	\$21,204.00
Drake, E. Michelle	Executive Shareholder	21	\$820.00	53.7	\$44,034.00
Hibray, Jean K	Paralegal		\$370.00	41.4	\$15,318.00
Kiener, Ariana B	Associate	1	\$490.00	15.3	\$7,497.00
Albanese, John G	Shareholder	10	\$640.00	3.9	\$2,496.00
Gionnette, Julie	Legal Assistant		\$220.00	2.6	\$572.00

Twersky, Martin I.	Shareholder	42	\$890.00	2.3	\$2,047.00
Lechtzin, Eric	Shareholder	30	\$680.00	1.5	\$1,020.00
Totals				480.2	\$254,293.00

8. The Settlement Administrator has estimated its total costs to be \$10,886. These costs include preparing and mailing notice to the Class Members, establishing and maintaining the Settlement Website, updating Class Member contact information, tracking and reviewing opt outs, and class member contact information updates, and should final approval be granted, issuing and mailing payments to the Class Members.

The foregoing statement is made under penalty of perjury and is true and correct to the best of my knowledge and belief.

Date: January 21, 2022

/s/Joseph Hashmall
Joseph Hashmall

Exhibit A

empname	entrydate	LodestarRate	hrs	LodestarAmount	narrative
Hashmall, Joseph C	8/5/2019	\$550.00	0.8	440	Research regarding [REDACTED]
Albanese, John G	8/6/2019	\$640.00	0.6	384	Meet with Ari Kiener, Joe Hashmall and Michelle Drake regarding case.
Drake, E. Michelle	8/6/2019	\$820.00	1	820	review [REDACTED] referring counsel
Drake, E. Michelle	8/6/2019	\$820.00	0.6	492	meet with JCH JGA and Ari Kleiner re [REDACTED]
Hashmall, Joseph C	8/6/2019	\$550.00	0.4	220	Meeting with law clerk regarding [REDACTED]
Hashmall, Joseph C	8/6/2019	\$550.00	1.6	880	Meeting regarding potential case, follow up research regarding same
Kiener, Ariana B	8/6/2019	\$490.00	6.1	2989	Research [REDACTED]
Kiener, Ariana B	8/6/2019	\$490.00	0.6	294	Attend meeting with E. Drake, J. Albanese, and J. Hashmall regarding next steps [REDACTED]
Drake, E. Michelle	8/7/2019	\$820.00	1.1	902	review documents re potential claims, email with Ari Kiener about documents [REDACTED]
Hashmall, Joseph C	8/7/2019	\$550.00	0.7	385	Drafting [REDACTED]
Kiener, Ariana B	8/7/2019	\$490.00	1.3	637	Research [REDACTED]
Drake, E. Michelle	8/8/2019	\$820.00	0.7	574	call with Dave Maxfield, email team [REDACTED]
Hashmall, Joseph C	8/8/2019	\$550.00	0.3	165	Internal emails regarding [REDACTED]
Kiener, Ariana B	8/8/2019	\$490.00	0.5	245	Research [REDACTED]
Drake, E. Michelle	8/9/2019	\$820.00	0.1	82	team meeting re next steps in litigation
Hashmall, Joseph C	8/9/2019	\$550.00	0.1	55	Litigation team meeting
Kiener, Ariana B	8/9/2019	\$490.00	0.3	147	Call [REDACTED]
Hashmall, Joseph C	8/13/2019	\$550.00	0.2	110	Email to potential cocounsel [REDACTED]
Hashmall, Joseph C	8/29/2019	\$550.00	0.2	110	Email [REDACTED] with referring counsel
Drake, E. Michelle	9/3/2019	\$820.00	0.1	82	meet with team re next steps in litigation
Hashmall, Joseph C	9/3/2019	\$550.00	0.1	55	Litigation team meeting
Xiong, Mai	9/3/2019	\$310.00	0.1	31	Meet with team re [REDACTED]
Hashmall, Joseph C	9/6/2019	\$550.00	0.1	55	Email to referring counsel [REDACTED]
Hashmall, Joseph C	9/13/2019	\$550.00	0.1	55	Email to cocounsel regarding [REDACTED]
Drake, E. Michelle	9/18/2019	\$820.00	0.1	82	meet with team re next steps in litigation
Hashmall, Joseph C	9/18/2019	\$550.00	0.1	55	Litigation team meeting
Hibray, Jean K	9/18/2019	\$370.00	0.2	74	Prepare [REDACTED]
Xiong, Mai	9/18/2019	\$310.00	0.1	31	Meet with team re [REDACTED]
Hashmall, Joseph C	10/2/2019	\$550.00	0.1	55	Internal email checking on status of case
Drake, E. Michelle	10/11/2019	\$820.00	0.8	656	call with D Maxfield [REDACTED]
Hashmall, Joseph C	10/14/2019	\$550.00	0.4	220	Internal emails regarding [REDACTED]
Hibray, Jean K	10/15/2019	\$370.00	0.1	37	Update [REDACTED], circulate
Xiong, Mai	10/16/2019	\$310.00	0.1	31	Review email from Dave Maxfield re [REDACTED]
Hashmall, Joseph C	10/18/2019	\$550.00	0.2	110	Internal email regarding [REDACTED]
Hashmall, Joseph C	10/25/2019	\$550.00	0.4	220	Edits to [REDACTED], call with Michelle Drake regarding same, email to cocounsel regarding same
Drake, E. Michelle	10/31/2019	\$820.00	0.1	82	meet with team re next steps in litigation
Hashmall, Joseph C	10/31/2019	\$550.00	0.5	275	Emails to cocounsel regarding [REDACTED]
Xiong, Mai	10/31/2019	\$310.00	0.1	31	Emails with JCH re [REDACTED]
Xiong, Mai	11/4/2019	\$310.00	0.1	31	Emails with Jean re [REDACTED]
Hashmall, Joseph C	11/6/2019	\$550.00	0.5	275	Review of case documents, emails to cocounsel regarding same
Hibray, Jean K	11/6/2019	\$370.00	0.3	111	Download of [REDACTED], emails re same.
Xiong, Mai	11/6/2019	\$310.00	0.1	31	Review emails between JCH and Jean re [REDACTED]
Hashmall, Joseph C	11/12/2019	\$550.00	0.3	165	Emails with cocounsel regarding [REDACTED]
Hashmall, Joseph C	11/18/2019	\$550.00	2.5	1375	Revisions to draft compliant, emails to cocounsel, internal emails regarding same
Xiong, Mai	11/18/2019	\$310.00	0.3	93	Review emails between JCH and Jean re [REDACTED]

Xiong, Mai	11/18/2019	\$310.00	0.1	31	Review emails between JCH and Dave Maxfield re [REDACTED]
Albanese, John G	11/19/2019	\$640.00	1.6	1024	Research [REDACTED]
Hashmall, Joseph C	11/19/2019	\$550.00	1.8	990	Emails to cocounsel regarding draft complaint, research regarding same
Xiong, Mai	11/19/2019	\$310.00	0.2	62	Review emails between EMD, JGA, JCH and Dave Maxfield re [REDACTED]
Drake, E. Michelle	11/20/2019	\$820.00	1.3	1066	review redline and revise complaint
Hashmall, Joseph C	11/20/2019	\$550.00	0.3	165	Internal emails and emails to cocounsel regarding draft complaint
Xiong, Mai	11/20/2019	\$310.00	0.1	31	Review email from JCH to Dave Maxfield re [REDACTED]
Hashmall, Joseph C	11/21/2019	\$550.00	2.2	1210	Research regarding [REDACTED]
Xiong, Mai	11/21/2019	\$310.00	0.1	31	Review emails between EMD, JCH and Dave Maxfield re [REDACTED]
Albanese, John G	11/22/2019	\$640.00	0.1	64	Discuss case status with litigation team.
Drake, E. Michelle	11/22/2019	\$820.00	0.1	82	team meeting to discuss next steps in litigation
Hashmall, Joseph C	11/22/2019	\$550.00	0.1	55	Litigation team meeting
Hashmall, Joseph C	11/22/2019	\$550.00	0.2	110	Emails regarding [REDACTED]
Xiong, Mai	11/22/2019	\$310.00	0.1	31	Team meeting to discuss [REDACTED]
Hashmall, Joseph C	11/26/2019	\$550.00	0.3	165	Emails with Ari Kiener regarding [REDACTED]
Kiener, Ariana B	11/26/2019	\$490.00	2	980	Find [REDACTED]
Hashmall, Joseph C	11/27/2019	\$550.00	0.2	110	Internal emails regarding draft complaint
Hashmall, Joseph C	12/2/2019	\$550.00	0.2	110	Email to cocounsel regarding draft complaint
Hashmall, Joseph C	12/2/2019	\$550.00	0.5	275	Review of research regarding [REDACTED], review of draft complaint [REDACTED]
Hashmall, Joseph C	12/3/2019	\$550.00	1.5	825	Revisions to draft complaint, internal emails regarding same
Kiener, Ariana B	12/3/2019	\$490.00	2.5	1225	Research [REDACTED]
Hashmall, Joseph C	12/4/2019	\$550.00	0.8	440	Revisions to draft complaint, internal emails regarding same
Drake, E. Michelle	12/5/2019	\$820.00	1.5	1230	review redline and revise draft complaint, email JCH re [REDACTED]
Hashmall, Joseph C	12/5/2019	\$550.00	0.8	440	Drafting [REDACTED]
Twersky, Martin I.	12/6/2019	\$890.00	1.5	1335	Read materials, including [REDACTED]
Hashmall, Joseph C	12/6/2019	\$550.00	2.2	1210	Edits to draft complaint, [REDACTED]
Lechtzin, Eric	12/9/2019	\$680.00	1.5	1020	Review [REDACTED] complaint and confer with [REDACTED]
Twersky, Martin I.	12/9/2019	\$890.00	0.8	712	Review [REDACTED]; [REDACTED]
Hashmall, Joseph C	12/9/2019	\$550.00	0.4	220	Edits to draft complaint, emails to cocounsel regarding same
Xiong, Mai	12/11/2019	\$310.00	0.1	31	Emails with JCH re [REDACTED]
Xiong, Mai	12/13/2019	\$310.00	0.5	155	Review rules of bankruptcy court for the district of South Carolina.
Xiong, Mai	12/13/2019	\$310.00	0.2	62	Review prior emails between EMD, JGA, JCH and Dave Maxfield re [REDACTED] Discuss same with JCH.
Xiong, Mai	12/13/2019	\$310.00	0.2	62	Review various emails between JCH and Dave Maxfield re [REDACTED], etc.
Xiong, Mai	12/13/2019	\$310.00	0.1	31	Review email from Beverly re [REDACTED]
Xiong, Mai	12/13/2019	\$310.00	0.2	62	Review email from Jean re [REDACTED]. Sort and file documents [REDACTED]
Xiong, Mai	12/13/2019	\$310.00	0.1	31	Review emails [REDACTED], draft complaint, etc.
Xiong, Mai	12/13/2019	\$310.00	1.3	403	Work on complaint.
Hashmall, Joseph C	12/17/2019	\$550.00	1.6	880	Review of and edits to draft complaint, motions to reopen and exhibits. Internal emails and emails to cocounsel regarding [REDACTED]
Xiong, Mai	12/17/2019	\$310.00	0.4	124	Prepare and work on motion to reopen bankruptcy case for Plaintiff Jones. Emails with JCH re same.
Xiong, Mai	12/17/2019	\$310.00	0.4	124	Prepare and work on motion to reopen bankruptcy case for Plaintiff Williams. Emails with JCH re same.
Xiong, Mai	12/17/2019	\$310.00	0.2	62	Review bankruptcy rules of district of South Carolina.
Xiong, Mai	12/17/2019	\$310.00	0.2	62	Email to Dave Maxfield re [REDACTED] Review emails from JCH and EMD to Dave Maxfield re [REDACTED]
Xiong, Mai	12/17/2019	\$310.00	0.1	31	Emails with JCH re status of proofing complaint, etc., and plan for filing.

Xiong, Mai	12/17/2019	\$310.00	2.7	837	Work on complaint. Assemble exhibits. [REDACTED]
Xiong, Mai	12/17/2019	\$310.00	0.2	62	Pull and save [REDACTED]
Xiong, Mai	12/17/2019	\$310.00	0.3	93	Work on motion to reopen bankruptcy case for Plaintiff Mayers. Emails with JCH re same.
Hashmall, Joseph C	12/19/2019	\$550.00	0.3	165	Emails to cocounsel regarding draft complaint
Xiong, Mai	12/19/2019	\$310.00	0.1	31	Review emails between JCH and Dave Maxfield re complaint.
Xiong, Mai	12/19/2019	\$310.00	0.1	31	Review email from Dave Maxfield [REDACTED].
Albanese, John G	12/20/2019	\$640.00	0.1	64	Discuss [REDACTED] with litigation team.
Drake, E. Michelle	12/20/2019	\$820.00	0.1	82	team meeting to discuss next steps in litigation
Hashmall, Joseph C	12/20/2019	\$550.00	0.3	165	Email to cocounsel regarding draft complaint
Hashmall, Joseph C	12/20/2019	\$550.00	0.1	55	Litigation team meeting
Xiong, Mai	12/20/2019	\$310.00	0.1	31	Team meeting re [REDACTED]
Hashmall, Joseph C	12/23/2019	\$550.00	0.5	275	Review [REDACTED]
Xiong, Mai	12/23/2019	\$310.00	0.1	31	Review emails between JCH and Dave Maxfield re [REDACTED]. Save updated drafts for file.
Xiong, Mai	12/23/2019	\$310.00	0.1	31	Review email from Dave Maxfield to [REDACTED].
Hashmall, Joseph C	12/30/2019	\$550.00	0.5	275	Emails to cocounsel, internal emails regarding [REDACTED]
Hashmall, Joseph C	12/30/2019	\$550.00	0.3	165	Review of case docket, internal emails regarding same
Xiong, Mai	12/30/2019	\$310.00	0.1	31	Review emails between JCH and Dave Maxfield re [REDACTED].
Xiong, Mai	12/30/2019	\$310.00	0.4	124	Review and save [REDACTED]. Calendar hearing date and objection deadline. Emails with EMD and JCH re same.
Hashmall, Joseph C	12/31/2019	\$550.00	0.8	440	Emails to cocounsel regarding upcoming hearing on motion to reopen, research regarding [REDACTED]
Xiong, Mai	12/31/2019	\$310.00	0.1	31	Review emails between JCH and Dave Maxfield re [REDACTED]
Xiong, Mai	12/31/2019	\$310.00	0.1	31	Review email from JCH to EMD re plan for attendance at hearings to reopen bankruptcy cases, and procedure for service/filing of adversary complaint.
Xiong, Mai	12/31/2019	\$310.00	0.3	93	Emails with JCH re [REDACTED]. Review docket alerts in WestLaw.
Hashmall, Joseph C	1/3/2020	\$550.00	0.2	110	Email to cocounsel regarding [REDACTED]
Xiong, Mai	1/3/2020	\$310.00	0.1	31	Review email from Dave Maxfield re [REDACTED]
Xiong, Mai	1/3/2020	\$310.00	0.1	31	Review emails between Dave Maxfield and JCH re [REDACTED]
Xiong, Mai	1/6/2020	\$310.00	0.2	62	Review [REDACTED]. Prepare draft email to [REDACTED]. Emails with JCH and EMD re same. Discuss same with Jean.
Xiong, Mai	1/6/2020	\$310.00	0.1	31	Review [REDACTED]
Xiong, Mai	1/6/2020	\$310.00	0.1	31	Work on case filing.
Xiong, Mai	1/6/2020	\$310.00	0.1	31	Review [REDACTED]
Xiong, Mai	1/6/2020	\$310.00	0.1	31	Review [REDACTED]
Xiong, Mai	1/6/2020	\$310.00	0.2	62	Emails with JCH re [REDACTED]
Hashmall, Joseph C	1/7/2020	\$550.00	0.3	165	Emails with cocounsel regarding filing of complaint
Xiong, Mai	1/7/2020	\$310.00	0.2	62	Review emails between JCH and Dave Maxfield re [REDACTED].
Xiong, Mai	1/7/2020	\$310.00	0.2	62	Review [REDACTED]. Email with JCH re same. Update calendar.
Xiong, Mai	1/7/2020	\$310.00	0.2	62	Review [REDACTED]. Email with JCH re same. Update calendar.
Xiong, Mai	1/7/2020	\$310.00	0.2	62	Review [REDACTED]. Email with JCH re same. Update calendar.
Hashmall, Joseph C	1/8/2020	\$550.00	0.8	440	Review of revisions to draft complaint, emails to cocounsel regarding same
Hashmall, Joseph C	1/9/2020	\$550.00	0.8	440	Review of revisions to draft complaint, emails to cocounsel regarding same
Xiong, Mai	1/9/2020	\$310.00	0.2	62	Review emails between Dave Maxfield and bankruptcy counsel re [REDACTED]. Review emails between JCH and Dave Maxfield re same. Save updated version of complaint in iManage.

Hashmall, Joseph C	1/10/2020	\$550.00	0.4	220	Emails with cocounsel regarding status of complaint
Xiong, Mai	1/10/2020	\$310.00	0.2	62	Review local rules for Bankruptcy Court for South Carolina re pro hac vice admission. Review local rules for U.S.D.C. South Carolina re pro hac vice admission.
Hashmall, Joseph C	1/13/2020	\$550.00	0.3	165	Emails with cocounsel regarding [REDACTED]
Xiong, Mai	1/13/2020	\$310.00	0.2	62	Review emails between JCH, EMD and Dave Maxfield re [REDACTED], call with court to discuss handling/filing of same, [REDACTED]. Review and save filed copy of adversary complaint for file.
Hashmall, Joseph C	1/14/2020	\$550.00	0.3	165	Email exchange with cocounsel regarding filing of complaint, PHV motions
Xiong, Mai	1/14/2020	\$310.00	0.2	62	Review emails between Dave Maxfield and JCH re [REDACTED]. Emails with Dave and JCE re pro hac vice admission for JCH and EMD.
Xiong, Mai	1/14/2020	\$310.00	0.4	124	Request certificates of good standing from MN Supreme Court for JCH. Attempt to request certificate of good standing from MN Supreme Court for EMD (need to reset password). Fill out Request Certification of Status for Supreme Court of Pennsylvania for JCH. Emails with Jean [REDACTED]. Prepare self-addressed stamped envelope. Coordinate delivery of same via U.S. Mail.
Xiong, Mai	1/14/2020	\$310.00	0.2	62	Review local rules for bankruptcy court for district of South Carolina, local rules for district of South Carolina and forms re pro hac vice admission.
Xiong, Mai	1/15/2020	\$310.00	2.2	682	Prepare pro hac vice application, supplemental bankruptcy application, motion and proposed order for JCH. Refer to local rules and bankruptcy rules.
Xiong, Mai	1/15/2020	\$310.00	0.1	31	Discuss with Jean re [REDACTED].
Hashmall, Joseph C	1/16/2020	\$550.00	0.5	275	Review of PHV materials
Xiong, Mai	1/16/2020	\$310.00	1.5	465	Prepare pro hac vice application, supplemental bankruptcy application, motion and proposed order for EMD. Discuss with Jean re statuses of previous SC cases. Refer to local rules and bankruptcy rules. Emails with EMD re same.
Xiong, Mai	1/16/2020	\$310.00	0.5	155	Work on pro hac vice application, supplemental bankruptcy application, motion and proposed order for JCH. Refer to local rules and bankruptcy rules. Review [REDACTED]. Emails with JCH re same.
Xiong, Mai	1/16/2020	\$310.00	0.2	62	Second attempt to request certificate of good standing from MN Supreme Court for EMD (reset password). Pay fee online. Emails with Jean re same.
Hashmall, Joseph C	1/17/2020	\$550.00	0.2	110	Emails to cocounsel regarding filing of complaint
Xiong, Mai	1/17/2020	\$310.00	1	310	Prepare pro hac vice application, supplemental bankruptcy application, motion and proposed order for EMD. Discuss with Jean re [REDACTED]. Refer to local rules and bankruptcy rules. Emails with EMD re same.
Xiong, Mai	1/17/2020	\$310.00	0.1	31	Review emails between JCH and Dave Maxfield re [REDACTED].
Hashmall, Joseph C	1/22/2020	\$550.00	0.6	330	Emails with cocounsel regarding next steps in case, review of PHV materials
Xiong, Mai	1/22/2020	\$310.00	0.2	62	Emails with JCH re pro hac vice docs. Email to Dave Maxfield re same.
Xiong, Mai	1/22/2020	\$310.00	0.3	93	Work on application, supplemental application, motion and proposed order for pro hac vice admission for JCH.
Xiong, Mai	1/22/2020	\$310.00	0.4	124	Work on application, supplemental application, motion and proposed order for pro hac vice admission for EMD.
Xiong, Mai	1/22/2020	\$310.00	0.2	62	Review emails between JCH and Dave Maxfield re [REDACTED].
Xiong, Mai	1/22/2020	\$310.00	0.1	31	Review, scan and save certificates of good standing from MN Supreme Court for JCH and EMD.
Hashmall, Joseph C	1/23/2020	\$550.00	0.3	165	Email to cocounsel regarding [REDACTED]
Xiong, Mai	1/23/2020	\$310.00	0.4	124	Review bankruptcy court rules and Judge Duncan's guidelines.
Xiong, Mai	1/23/2020	\$310.00	0.1	31	Review email from JCH to Dave Maxfield re [REDACTED].
Xiong, Mai	1/23/2020	\$310.00	0.2	62	Review filed adversary complaint [REDACTED].
Drake, E. Michelle	1/24/2020	\$820.00	0.3	246	emails with J. Hashmall re [REDACTED]
Hashmall, Joseph C	1/24/2020	\$550.00	0.3	165	Call with Dave Maxfield regarding next steps in case
Hashmall, Joseph C	1/24/2020	\$550.00	0.7	385	Call with cocounsel [REDACTED]
Hashmall, Joseph C	1/24/2020	\$550.00	0.3	165	Call with Dan Stone regarding [REDACTED]
Xiong, Mai	1/24/2020	\$310.00	0.2	62	Review email from Kristy Woodward re service completed on defendant by Court. Review email from JCH re answer deadline. Calendar answer deadline.
Xiong, Mai	1/24/2020	\$310.00	0.3	93	Review local rules for district of SC, bankruptcy local rules for district of SC and Judge Duncan's guidelines re next steps.
Xiong, Mai	1/24/2020	\$310.00	0.1	31	Review email from JCH [REDACTED]
Xiong, Mai	1/24/2020	\$310.00	0.1	31	Review [REDACTED]
Xiong, Mai	1/24/2020	\$310.00	0.1	31	Review emails between JCH, Daniel Stone, and Dave Maxfield re [REDACTED].
Xiong, Mai	1/27/2020	\$310.00	0.1	31	Review email from EMD to Kristy Woodward re [REDACTED].
Xiong, Mai	1/27/2020	\$310.00	0.2	62	Review, scan and save certification of inactive status from Supreme Court of PA for JCH.

Hashmall, Joseph C	1/29/2020	\$550.00	0.6	330	Internal emails regarding [REDACTED] regarding same
Xiong, Mai	1/29/2020	\$310.00	0.3	93	Review emails between JCH, EMD [REDACTED] Save drafts [REDACTED] Review emails between JCH and co-counsel re same.
Albanese, John G	1/30/2020	\$640.00	0.1	64	Meet with litigation team regarding case.
Drake, E. Michelle	1/30/2020	\$820.00	0.1	82	team meeting to discuss next steps in litigation
Hashmall, Joseph C	1/30/2020	\$550.00	0.2	110	Internal emails and emails to cocounsel regarding [REDACTED]
Hashmall, Joseph C	1/30/2020	\$550.00	0.3	165	Internal emails and emails with cocounsel regarding [REDACTED]
Hashmall, Joseph C	1/30/2020	\$550.00	0.1	55	Litigation team meeting
Xiong, Mai	1/30/2020	\$310.00	0.1	31	Review emails between JCH [REDACTED]
Xiong, Mai	1/30/2020	\$310.00	0.1	31	Email to Dave Maxfield and Kristy Woodward re pro hac vice docs.
Xiong, Mai	1/30/2020	\$310.00	0.1	31	Meet with team to discuss [REDACTED]
Kiener, Ariana B	1/30/2020	\$490.00	2	980	Research [REDACTED]
Hashmall, Joseph C	1/31/2020	\$550.00	0.2	110	Internal emails regarding [REDACTED]
Xiong, Mai	1/31/2020	\$310.00	0.3	93	Finalize JCH phv docs. Have JCH sign, notarize, scan and save.
Xiong, Mai	1/31/2020	\$310.00	0.2	62	Finalize EMD phv docs. Print for EMD to sign.
Xiong, Mai	1/31/2020	\$310.00	0.1	31	Review emails between JCH [REDACTED]
Xiong, Mai	1/31/2020	\$310.00	0.2	62	Emails with Kristy Woodward and Daniel Stone re phv docs for JCH.
Hashmall, Joseph C	2/1/2020	\$550.00	0.2	110	Email to cocounsel regarding [REDACTED]
Hashmall, Joseph C	2/3/2020	\$550.00	0.4	220	Call with cocounsel regarding next steps in case
Hashmall, Joseph C	2/3/2020	\$550.00	0.2	110	Emails regarding [REDACTED]
Xiong, Mai	2/3/2020	\$310.00	0.2	62	Review emails between JCH and co-counsel re [REDACTED] Review emails between JCH and co-counsel re [REDACTED]
Xiong, Mai	2/3/2020	\$310.00	0.2	62	Finalize EMD phv docs. Scan and save signed and notarized application of EMD for phv admission. Email to Kristy Woodward and Dan Stone re phv docs for EMD.
Hashmall, Joseph C	2/4/2020	\$550.00	0.2	110	Call and email [REDACTED]
Xiong, Mai	2/4/2020	\$310.00	0.1	31	Review affidavit of service from co-counsel (service upon LexMed). Save copy of same for file.
Xiong, Mai	2/4/2020	\$310.00	0.3	93	Prepare [REDACTED] Download and save e-stamped pleadings for file.
Xiong, Mai	2/4/2020	\$310.00	0.1	31	Review emails between Kristy and JCH re pro hac vice docs filed for JCH and EMD.
Xiong, Mai	2/4/2020	\$310.00	0.1	31	Review emails between JCH and co-counsel re [REDACTED]
Hashmall, Joseph C	2/6/2020	\$550.00	0.3	165	Emails with cocounsel regarding service of complaint, other administrative details
Xiong, Mai	2/6/2020	\$310.00	0.1	31	Review emails between Dave Maxfield and JCH re affidavit of service sent to counsel for defendant.
Xiong, Mai	2/6/2020	\$310.00	0.2	62	Review email from Dave Maxfield's office [REDACTED] Review JCH and EMD's [REDACTED]
Hashmall, Joseph C	2/7/2020	\$550.00	0.4	220	Call with [REDACTED]
Hashmall, Joseph C	2/11/2020	\$550.00	0.2	110	Email to cocounsel in [REDACTED]
Hashmall, Joseph C	2/12/2020	\$550.00	0.3	165	Calls with Dave Maxfield and opposing counsel regarding first steps in case, extension to respond to complaint
Hashmall, Joseph C	2/12/2020	\$550.00	0.3	165	Call with [REDACTED]
Hashmall, Joseph C	2/13/2020	\$550.00	0.2	110	Emails with cocounsel regarding [REDACTED]
Hashmall, Joseph C	2/14/2020	\$550.00	0.2	110	Review of draft stipulation to extend deadlines, email to cocounsel regarding same
Xiong, Mai	2/19/2020	\$310.00	0.2	62	Review, scan, and save orders granting pro hac vice applications for JCH and EMD. Email to JCH and EMD re same.
Xiong, Mai	2/25/2020	\$310.00	0.2	62	Review and save certification of extension of time to file answer filed by defendant. Update calendar with new answer deadline.
Xiong, Mai	2/25/2020	\$310.00	0.1	31	Review case docket on PACER for new pleadings/case progression.
Hashmall, Joseph C	3/4/2020	\$550.00	1.7	935	Review of Defendant's motion to dismiss, email exchange with cocounsel regarding same
Xiong, Mai	3/4/2020	\$310.00	0.1	31	Review emails between JCH and co-counsel [REDACTED] Save copies of same for file. Emails with JCH re [REDACTED]
Xiong, Mai	3/4/2020	\$310.00	0.2	62	Review case docket on PACER. Download and save new pleadings for file.
Xiong, Mai	3/4/2020	\$310.00	0.2	62	Review local rules for the Bankruptcy Court of South Carolina and Judge Duncan's chambers guidelines for deadline to respond to motions (no definitive deadline).

Drake, E. Michelle	3/6/2020	\$820.00	2	1640	review D motion to dismiss
Hashmall, Joseph C	3/6/2020	\$550.00	0.5	275	Research regarding [REDACTED], emails to cocounsel regarding same
Xiong, Mai	3/6/2020	\$310.00	0.2	62	Review various emails between JCH and Dave Maxfield re review of defendant's motion to dismiss, [REDACTED].
Xiong, Mai	3/6/2020	\$310.00	0.2	62	Review and save notice of hearing on defendant's motion to dismiss and accompanying docs for file. Calendar hearing date and response deadline.
Hashmall, Joseph C	3/10/2020	\$550.00	0.2	110	Email to cocounsel [REDACTED]
Xiong, Mai	3/10/2020	\$310.00	0.1	31	Review emails between JCH and Daniel Stone re [REDACTED].
Xiong, Mai	3/10/2020	\$310.00	0.2	62	Review case docket for updates. Download and save new pleadings for file.
Hashmall, Joseph C	3/11/2020	\$550.00	0.8	440	Researching and outlining response to motion to dismiss
Xiong, Mai	3/11/2020	\$310.00	0.1	31	Review email from Dave Maxfield [REDACTED]
Drake, E. Michelle	3/12/2020	\$820.00	0.5	410	meet with JCH on [REDACTED]
Hashmall, Joseph C	3/12/2020	\$550.00	0.5	275	Meeting with Michelle Drake regarding [REDACTED]
Hashmall, Joseph C	3/12/2020	\$550.00	2.2	1210	Researching and outlining response to motion to dismiss
Hashmall, Joseph C	3/13/2020	\$550.00	0.3	165	Internal emails regarding [REDACTED]
Xiong, Mai	3/13/2020	\$310.00	0.4	124	Review local rules and Judge Duncan's procedural guidelines. Prepare template for response to motion to dismiss. Emails with JCH re same.
Hashmall, Joseph C	3/16/2020	\$550.00	3.2	1760	Drafting response to motion to dismiss
Hashmall, Joseph C	3/17/2020	\$550.00	6	3300	Researching, drafting and revising response to motion to dismiss
Hashmall, Joseph C	3/17/2020	\$550.00	0.6	330	Research [REDACTED]
Xiong, Mai	3/17/2020	\$310.00	0.3	93	Review local rules and Judge Duncan's procedures re page limit for response to motion to dismiss. Emails with JCH re same.
Xiong, Mai	3/18/2020	\$310.00	0.1	31	Review email from JCH to EMD re [REDACTED]
Hashmall, Joseph C	3/20/2020	\$550.00	0.1	55	Litigation team meeting
Hashmall, Joseph C	3/24/2020	\$550.00	0.2	110	Internal emails regarding [REDACTED]
Drake, E. Michelle	3/27/2020	\$820.00	3.2	2624	review redline and revise draft response to motion to dismiss
Xiong, Mai	3/27/2020	\$310.00	0.1	31	Review [REDACTED]. Review multiple emails between JCH and EMD [REDACTED].
Hashmall, Joseph C	3/30/2020	\$550.00	1.7	935	Edits to response to motion to dismiss, emails with cocounsel [REDACTED]
Drake, E. Michelle	3/31/2020	\$820.00	1.1	902	review redline and revise final version of objection to LMC motion to dismiss
Hashmall, Joseph C	3/31/2020	\$550.00	1.1	605	Review of [REDACTED], further edits and internal emails regarding same
Hashmall, Joseph C	4/1/2020	\$550.00	1.6	880	Final edits [REDACTED] internal emails and emails to cocounsel regarding same
Xiong, Mai	4/1/2020	\$310.00	0.2	62	Review [REDACTED]. Review multiple emails between JCH and EMD [REDACTED].
Xiong, Mai	4/1/2020	\$310.00	1	310	Proof and finalize response to motion to dismiss. Review local rules and Judge's guidelines. Emails with JCH re same. Emails with co-counsel's office [REDACTED]
Albanese, John G	4/6/2020	\$640.00	0.1	64	Discuss case status with litigation team
Drake, E. Michelle	4/6/2020	\$820.00	0.1	82	team meeting re next steps in litigation
Hashmall, Joseph C	4/6/2020	\$550.00	0.2	110	Email to cocounsel regarding [REDACTED]
Hashmall, Joseph C	4/6/2020	\$550.00	0.1	55	Litigation team meeting
Xiong, Mai	4/6/2020	\$310.00	0.1	31	Meet with team re [REDACTED]
Hashmall, Joseph C	4/7/2020	\$550.00	0.1	55	Email to cocounsel regarding [REDACTED]
Hashmall, Joseph C	4/7/2020	\$550.00	0.8	440	Review of Defendant's reply in support of motion to dismiss, [REDACTED]
Xiong, Mai	4/8/2020	\$310.00	0.1	31	Review emails between JCH and Dave Maxfield re [REDACTED]. Emails with JCH re [REDACTED].
Xiong, Mai	4/8/2020	\$310.00	0.2	62	Review case docket. Download and save e-stamped copy of our responsive brief in opposition to motion to dismiss. Download and save notice of appearance for Matthew D. Patterson for defendant.
Drake, E. Michelle	4/14/2020	\$820.00	0.2	164	review email from court clerk re availability for in person hearing, email with local counsel re same
Hashmall, Joseph C	4/14/2020	\$550.00	0.1	55	Email with cocounsel regarding hearing on motion to dismiss
Xiong, Mai	4/14/2020	\$310.00	0.1	31	Review emails between JCH and Dave Maxfield re status of motion to dismiss hearing being continued.
Xiong, Mai	4/16/2020	\$310.00	0.2	62	Review emails between Dave Maxfield, opposing counsel, and Judge Duncan's clerk re continuing motion to dismiss hearing to May 21. Review email from JCH re same. Update calendar.
Xiong, Mai	4/16/2020	\$310.00	0.3	93	Prepare [REDACTED]

Hashmall, Joseph C	4/17/2020	\$550.00	0.4	220	Review of and edits to [REDACTED], internal emails and emails to cocounsel regarding same.
Xiong, Mai	4/17/2020	\$310.00	0.4	124	Finalize [REDACTED]. Prepare [REDACTED]. [REDACTED] Emails with JCH re same. [REDACTED].
Xiong, Mai	4/17/2020	\$310.00	0.1	31	Review emails between JCH, Dave Maxfield and Daniel Stone re [REDACTED].
Hashmall, Joseph C	4/20/2020	\$550.00	0.4	220	Review of draft [REDACTED], emails to clients [REDACTED].
Xiong, Mai	4/20/2020	\$310.00	1	310	Prepare and finalize letters to [REDACTED]. [REDACTED]. Email to [REDACTED]. Email to [REDACTED]. [REDACTED] r. Email to [REDACTED]. Coordinate [REDACTED]. [REDACTED]. Copy co-counsel and JCH on emails. Review emails from JCH to [REDACTED]. Update [REDACTED].
Xiong, Mai	4/20/2020	\$310.00	0.2	62	Review emails between Dave Maxfield and JCH re [REDACTED]. [REDACTED] Emails with JCH re [REDACTED].
Xiong, Mai	4/22/2020	\$310.00	0.1	31	Review [REDACTED].
Hashmall, Joseph C	4/23/2020	\$550.00	0.2	110	Email to client [REDACTED].
Hashmall, Joseph C	4/24/2020	\$550.00	0.1	55	Internal emails regarding [REDACTED].
Hashmall, Joseph C	4/28/2020	\$550.00	0.2	110	Email to client [REDACTED].
Hashmall, Joseph C	4/29/2020	\$550.00	0.4	220	Call with client [REDACTED].
Xiong, Mai	4/29/2020	\$310.00	0.2	62	Review [REDACTED]. Review emails between JCH and [REDACTED]. [REDACTED] Emails with JCH re [REDACTED].
Hashmall, Joseph C	5/1/2020	\$550.00	0.3	165	Email to client [REDACTED].
Hashmall, Joseph C	5/4/2020	\$550.00	0.3	165	Email to client [REDACTED].
Hashmall, Joseph C	5/5/2020	\$550.00	0.2	110	Email to client Williams [REDACTED].
Xiong, Mai	5/5/2020	\$310.00	0.1	31	Review emails between JCH and [REDACTED].
Hashmall, Joseph C	5/11/2020	\$550.00	0.2	110	Email to cocounsel checking [REDACTED].
Hashmall, Joseph C	5/14/2020	\$550.00	2.9	1595	Researching issues [REDACTED].
Hashmall, Joseph C	5/14/2020	\$550.00	0.6	330	Emails and call with cocounsel regarding [REDACTED].
Hashmall, Joseph C	5/15/2020	\$550.00	0.6	330	Internal emails regarding [REDACTED], further legal research on the [REDACTED].
Hashmall, Joseph C	5/15/2020	\$550.00	1.2	660	Calls with clients [REDACTED].
Xiong, Mai	5/15/2020	\$310.00	0.4	124	Review emails from JCH to [REDACTED]. Emails with JCH re [REDACTED]. [REDACTED] Update [REDACTED]. Review [REDACTED]. [REDACTED] email from JCH to [REDACTED]. Emails with JCH re [REDACTED]. [REDACTED] Resend [REDACTED].
Hashmall, Joseph C	5/18/2020	\$550.00	1.8	990	Legal research in advance of motion to dismiss hearing, drafting [REDACTED].
Xiong, Mai	5/18/2020	\$310.00	0.1	31	Emails with JCH re [REDACTED].
Hashmall, Joseph C	5/19/2020	\$550.00	1.1	605	Legal research in advance of motion to dismiss argument [REDACTED].
Hashmall, Joseph C	5/20/2020	\$550.00	0.3	165	Review of emails from court and counsel regarding rescheduling of motion to dismiss hearing [REDACTED].
Xiong, Mai	5/20/2020	\$310.00	0.2	62	Review email from Judge Duncan's clerk re continued hearing on defendant's motion to dismiss. Review email from JCH re same. Update calendar.
Xiong, Mai	5/27/2020	\$310.00	0.1	31	Review email from Rachel re mail received from bankruptcy court. [REDACTED].
Drake, E. Michelle	6/1/2020	\$820.00	3	2460	begin preparation for hearing on motion to [REDACTED].
Hashmall, Joseph C	6/2/2020	\$550.00	1.8	990	Review of motion materials in advance of motion to dismiss hearing [REDACTED].
Albanese, John G	6/3/2020	\$640.00	0.1	64	Discu [REDACTED] litigation team.
Drake, E. Michelle	6/3/2020	\$820.00	1.5	1230	begin preparation for [REDACTED].
Drake, E. Michelle	6/3/2020	\$820.00	0.5	410	test video call with the court--assess video problems [REDACTED].
Drake, E. Michelle	6/3/2020	\$820.00	4.5	3690	continue hearing preparation. Review memo from J. Hashmall [REDACTED].
Drake, E. Michelle	6/3/2020	\$820.00	4	3280	prepare for hearing. Review cases [REDACTED].
Drake, E. Michelle	6/3/2020	\$820.00	0.1	82	meet with team re next steps in litigation [REDACTED].
Hashmall, Joseph C	6/3/2020	\$550.00	0.1	55	Litigation team meeting [REDACTED].
Hashmall, Joseph C	6/3/2020	\$550.00	0.8	440	Drafting notice of supplemental authority regarding motion to dismiss, emails regarding same [REDACTED].

Hashmall, Joseph C	6/3/2020	\$550.00	3.4	1870	Research and internal emails in advance of motion to dismiss hearing
Xiong, Mai	6/3/2020	\$310.00	0.2	62	Review email from Judge Duncan's clerk re video/conference instructions for hearing tomorrow. Update calendar.
Xiong, Mai	6/3/2020	\$310.00	0.1	31	Meet with team to discuss status of case and next steps.
Drake, E. Michelle	6/4/2020	\$820.00	3.6	2952	prepare for hearing. Review [REDACTED]
Drake, E. Michelle	6/4/2020	\$820.00	1	820	argue against D motion to dismiss
Hashmall, Joseph C	6/4/2020	\$550.00	0.7	385	Call with Michelle Drake regarding upcoming motion hearing
Hashmall, Joseph C	6/4/2020	\$550.00	1.3	715	Video motion to dismiss hearing, follow up call with cocounsel [REDACTED]
Xiong, Mai	6/5/2020	\$310.00	0.1	31	Review emails between EMD and JCH re complaint saved in iManage.
Xiong, Mai	6/5/2020	\$310.00	0.2	62	Review emails between EMD and JCH re notice of supplemental authority. Review emails between JCH and Dave Maxfield re filing of same.
Xiong, Mai	6/22/2020	\$310.00	0.1	31	Text messages and emails with JGA re [REDACTED]
Drake, E. Michelle	7/8/2020	\$820.00	0.5	410	review order denying motion to dismiss, call with J Hashmall re [REDACTED]
Hashmall, Joseph C	7/8/2020	\$550.00	0.8	440	Review of order on motion to dismiss, internal emails and emails with cocounsel regarding same
Xiong, Mai	7/8/2020	\$310.00	0.4	124	Review and save (22 pg) order dismissing defendant's motion to dismiss. Discuss with EMD and JCH re same. Review internal emails re same. Review emails between JCH and Dave Maxfield re same. Review Federal Rules of Bankruptcy Procedure re def's answer deadline.
Hashmall, Joseph C	7/9/2020	\$550.00	0.2	110	Email exchange with cocounsel regarding schedule in case
Hashmall, Joseph C	7/13/2020	\$550.00	2.8	1540	Drafting discovery requests, Set I
Hashmall, Joseph C	7/14/2020	\$550.00	1.8	990	Edits to draft discovery requests, internal emails regarding same
Hashmall, Joseph C	7/14/2020	\$550.00	1.9	1045	Research [REDACTED]
Xiong, Mai	7/16/2020	\$310.00	0.1	31	Emails with Rachel re docs received from bankruptcy court.
Hashmall, Joseph C	7/23/2020	\$550.00	0.5	275	Review of Defendant's answer, internal emails and emails with cocounsel regarding [REDACTED]
Hashmall, Joseph C	7/23/2020	\$550.00	1.2	660	Drafting requests for admission, internal email regarding same
Hashmall, Joseph C	7/27/2020	\$550.00	0.2	110	Email to cocounsel regarding [REDACTED]
Hashmall, Joseph C	7/28/2020	\$550.00	0.5	275	Call and emails with cocounsel regarding [REDACTED]
Albanese, John G	7/29/2020	\$640.00	0.1	64	Meet with case team regarding [REDACTED]
Hashmall, Joseph C	7/29/2020	\$550.00	0.2	110	Litigation team meeting
Xiong, Mai	7/29/2020	\$310.00	0.1	31	Discuss [REDACTED] with team.
Hashmall, Joseph C	7/30/2020	\$550.00	0.7	385	Drafting letter to opposing counsel regarding case schedule, internal email regarding same
Hashmall, Joseph C	8/3/2020	\$550.00	0.8	440	Review of Court's order regarding scheduling report, drafting proposed report, email to cocounsel regarding same
Drake, E. Michelle	8/4/2020	\$820.00	1.5	1230	review redline and revise RFPs, Interrogatories, RFAs and 30b6 notice.
Hashmall, Joseph C	8/4/2020	\$550.00	0.3	165	Internal emails and emails to cocounsel regarding adversary proceeding report
Hashmall, Joseph C	8/5/2020	\$550.00	0.2	110	Internal emails regarding case deadlines
Hashmall, Joseph C	8/5/2020	\$550.00	0.5	275	Review of edits to draft discovery, emails with cocounsel regarding adversary proceeding report
Hashmall, Joseph C	8/5/2020	\$550.00	0.6	330	Finalizing draft discovery and draft adversary proceeding report, email to opposing counsel attaching same
Hashmall, Joseph C	8/5/2020	\$550.00	0.6	330	Edits to draft 30b6 notice, email to Michelle Drake regarding same
Xiong, Mai	8/5/2020	\$310.00	0.1	31	Review emails between JCH and opposing counsel re confer/call to discuss issues in Court's order and draft Adversary Proceeding Report.
Xiong, Mai	8/5/2020	\$310.00	0.2	62	Review emails between JCH and co-counsel re order issued by court, deadlines set therein, and scheduling call to discuss same. Review email from JCH to EMD re same.
Xiong, Mai	8/5/2020	\$310.00	0.1	31	Review email from JCH to EMD re draft/proposed edits to adversary proceeding report. Review emails between JCH and co-counsel re same.
Hashmall, Joseph C	8/6/2020	\$550.00	0.4	220	Review of email from opposing counsel regarding edits to adversary report, emails to cocounsel and opposing counsel regarding same
Hashmall, Joseph C	8/6/2020	\$550.00	0.5	275	Call with opposing counsel regarding adversary proceeding report, follow up internal emails and email to opposing counsel regarding same
Xiong, Mai	8/6/2020	\$310.00	0.1	31	Review emails between JCH and opposing counsel re confer/call to discuss issues in Court's order and draft Adversary Proceeding Report.
Drake, E. Michelle	8/7/2020	\$820.00	0.8	656	research [REDACTED]
Drake, E. Michelle	8/7/2020	\$820.00	1.3	1066	review redline and revise [REDACTED]
Hashmall, Joseph C	8/7/2020	\$550.00	0.1	55	Email to opposing counsel regarding adversary proceeding report

Hashmall, Joseph C	8/10/2020	\$550.00	0.2	110	Internal email and email to cocounsel regarding drafting initial disclosures
Drake, E. Michelle	8/11/2020	\$820.00	0.2	164	review and approve joint scheduling submission
Xiong, Mai	8/11/2020	\$310.00	0.1	31	Emails with JCH re drafting initial disclosures.
Xiong, Mai	8/11/2020	\$310.00	0.1	31	Review emails between JCH and opposing counsel re confer/call to discuss issues in Court's order and draft Adversary Proceeding Report.
Hashmall, Joseph C	8/12/2020	\$550.00	0.5	275	Review of opposing counsel's edits to draft report to court, emails to cocounsel and opposing counsel regarding same
Hashmall, Joseph C	8/12/2020	\$550.00	0.3	165	Emails to cocounsel regarding [REDACTED]
Xiong, Mai	8/12/2020	\$310.00	0.2	62	Review deadlines from court's latest order. Calendar deadlines.
Hashmall, Joseph C	8/13/2020	\$550.00	0.7	385	Review of and edits to plaintiff's initial disclosures, emails to cocounsel regarding same
Xiong, Mai	8/13/2020	\$310.00	0.4	124	Prepare initial disclosures. Emails with JCH re same. Review emails between JCH and co-counsel re same.
Xiong, Mai	8/13/2020	\$310.00	0.1	31	Review emails between JCH and co-counsel re joint adversary proceeding report.
Hashmall, Joseph C	8/14/2020	\$550.00	0.6	330	Emails with opposing counsel regarding initial disclosures, emails to cocounsel and internal emails regarding docket notices
Xiong, Mai	8/14/2020	\$310.00	0.2	62	Review emails between JCH and opposing counsel re initial disclosures, adversary proceeding report, draft protective order [REDACTED]. Save final copy of plaintiff's initial disclosures for file.
Xiong, Mai	8/14/2020	\$310.00	0.2	62	Review emails between JCH and Dave Maxfield re [REDACTED]. Review emails between EMD and JCH re same.
Xiong, Mai	8/14/2020	\$310.00	0.3	93	Emails with JCH re [REDACTED].
Hashmall, Joseph C	8/17/2020	\$550.00	0.2	110	Review of Defendant's initial disclosures, internal emails regarding same
Xiong, Mai	8/17/2020	\$310.00	0.2	62	Review email from co-counsel's office re defendant's initial disclosures. Review and save copy of same for file.
Xiong, Mai	8/18/2020	\$310.00	0.1	31	Review emails between co-counsel and court clerk re signing us up to receive electronic notices.
Hashmall, Joseph C	8/19/2020	\$550.00	0.3	165	Review of Court's scheduling order, internal email regarding same
Hashmall, Joseph C	8/19/2020	\$550.00	0.4	220	Email exchange with opposing counsel regarding discovery responses and production deadlines email to cocounsel regarding same
Xiong, Mai	8/19/2020	\$310.00	0.1	31	Review emails between JCH and opposing counsel re when to expect discovery responses and productions.
Xiong, Mai	8/19/2020	\$310.00	0.2	62	Review and save scheduling order.
Hashmall, Joseph C	8/20/2020	\$550.00	0.3	165	Review of email from cocounsel regarding [REDACTED], email to opposing counsel regarding same
Xiong, Mai	8/20/2020	\$310.00	0.1	31	Review emails between JCH and opposing counsel re when to expect discovery responses and productions.
Xiong, Mai	8/20/2020	\$310.00	0.1	31	Emails with JCH re [REDACTED].
Hashmall, Joseph C	8/21/2020	\$550.00	0.1	55	Internal emails regarding [REDACTED]
Hashmall, Joseph C	8/21/2020	\$550.00	0.2	110	Email exchange with opposing counsel regarding discovery extension
Xiong, Mai	8/21/2020	\$310.00	0.2	62	Review emails from court clerk re signing us up to receive electronic notices and follow steps to get us signed up.
Xiong, Mai	8/21/2020	\$310.00	0.2	62	Review various emails between JCH and opposing counsel re when to expect discovery responses and productions. Emails with JCH re calendaring proposed deadline. Calendar deadline.
Xiong, Mai	8/21/2020	\$310.00	0.3	93	Review scheduling order and calendar deadlines.
Hashmall, Joseph C	8/24/2020	\$550.00	0.2	110	Emails with court administration, internal emails regarding ECF enrollment
Xiong, Mai	8/24/2020	\$310.00	0.1	31	Review emails between EMD, JCH and US Bky Court for SC re case number for ECF registration. Review email from JCH re same.
Xiong, Mai	8/24/2020	\$310.00	0.1	31	Review email from Rachel re mail received at office from bankruptcy court.
Xiong, Mai	8/25/2020	\$310.00	0.2	62	Add mplsparalegals email address as secondary to receive ECF filings.
Albanese, John G	8/31/2020	\$640.00	0.1	64	Discuss [REDACTED] with case team.
Hashmall, Joseph C	8/31/2020	\$550.00	0.1	55	Litigation team meeting
Xiong, Mai	8/31/2020	\$310.00	0.1	31	Discuss [REDACTED] with team.
Xiong, Mai	9/11/2020	\$310.00	0.3	93	Review email from opposing counsel re LMC's first discovery requests. Review and save copies of same for file (extract individual docs from combined PDF to save separately). Calendar response deadline.
Hashmall, Joseph C	9/14/2020	\$550.00	0.5	275	Review of Defendant's discovery requests, emails to cocounsel regarding responses to same
Xiong, Mai	9/14/2020	\$310.00	0.1	31	Review email from JCH to co-counsel re drafting discovery responses. Review email from JCH re calendaring response deadline.
Albanese, John G	9/15/2020	\$640.00	0.1	64	Meet with litigation team regarding [REDACTED]

Drake, E. Michelle	9/15/2020	\$820.00	0.1	82	team meeting re next steps in litigation
Hashmall, Joseph C	9/15/2020	\$550.00	0.1	55	Litigation team meeting
Xiong, Mai	9/15/2020	\$310.00	0.1	31	Meet with team re [REDACTED].
Hashmall, Joseph C	9/16/2020	\$550.00	0.3	165	Email exchange with cocounsel regarding responses to Defendant's discovery requests
Xiong, Mai	9/17/2020	\$310.00	0.2	62	Review emails between JCH and co-counsel re [REDACTED]
Hashmall, Joseph C	9/22/2020	\$550.00	0.4	220	Review of draft protective order, email to opposing counsel regarding same, internal emails regarding same
Hashmall, Joseph C	9/25/2020	\$550.00	1.8	990	Outlining responses to Defendant's discovery requests, internal emails regarding same
Hashmall, Joseph C	9/25/2020	\$550.00	0.1	55	Review of notice from court regarding protective order
Hashmall, Joseph C	9/25/2020	\$550.00	0.1	55	Email to cocounsel regarding [REDACTED]
Hashmall, Joseph C	9/29/2020	\$550.00	1.2	660	Review of Defendant's discovery responses and production, internal emails and emails to opposing counsel regarding same
Xiong, Mai	9/29/2020	\$310.00	0.1	31	Review and save confidentiality order for file.
Xiong, Mai	9/29/2020	\$310.00	0.1	31	Review emails between JCH and co-counsel re [REDACTED].
Hashmall, Joseph C	10/1/2020	\$550.00	0.3	165	Emails to cocounsel and opposing counsel regarding discovery status
Xiong, Mai	10/1/2020	\$310.00	0.1	31	Emails with JCH re [REDACTED].
Xiong, Mai	10/1/2020	\$310.00	0.2	62	Review letter and discovery responses from opposing counsel.
Xiong, Mai	10/1/2020	\$310.00	0.2	62	Review and save WestLaw docket notice. Review and save confidential protective order.
Xiong, Mai	10/1/2020	\$310.00	0.1	31	Review emails between JCH and opposing counsel re discovery responses and supplemental document production.
Hashmall, Joseph C	10/2/2020	\$550.00	0.6	330	Internal emails regarding status of Plaintiff's discovery responses
Xiong, Mai	10/2/2020	\$310.00	0.2	62	Review various emails between JCH and co-counsel re [REDACTED]
Xiong, Mai	10/2/2020	\$310.00	0.1	31	Review emails between JCH and opposing counsel re status of defendnat's supplemental responses and docs.
Albanese, John G	10/5/2020	\$640.00	0.1	64	Discuss [REDACTED] with litigation team.
Drake, E. Michelle	10/5/2020	\$820.00	0.1	82	team meeting re next steps in litigation
Hashmall, Joseph C	10/5/2020	\$550.00	0.5	275	Call with cocounsel regarding [REDACTED]
Hashmall, Joseph C	10/5/2020	\$550.00	0.2	110	Litigation team meeting
Hashmall, Joseph C	10/5/2020	\$550.00	0.2	110	Internal emails regarding discovery deadlines
Xiong, Mai	10/5/2020	\$310.00	0.1	31	Review emails between co-counsel and opposing counsel re extension to respond to discovery requests. Calendar same.
Xiong, Mai	10/5/2020	\$310.00	2	620	Work on answers to interrogatories. Work on responses to request for production. Emails with JCH re same.
Xiong, Mai	10/6/2020	\$310.00	2	620	Work on answers to interrogatories. Work on responses to request for production. Emails with JCH re same.
Xiong, Mai	10/6/2020	\$310.00	0.1	31	Review email from Jean re mail received at the office (hard copy of def's discovery responses).
Xiong, Mai	10/6/2020	\$310.00	0.1	31	Review email from Rachel re mail received at the office (hard copies of confidentiality order).
Xiong, Mai	10/7/2020	\$310.00	0.1	31	Review email from JCH to co-counsel re [REDACTED]
Hashmall, Joseph C	10/8/2020	\$550.00	0.4	220	Emails exchange with cocounsel regarding [REDACTED]
Hashmall, Joseph C	10/8/2020	\$550.00	0.3	165	Email to opposing counsel regarding discovery meet and confer
Xiong, Mai	10/8/2020	\$310.00	0.1	31	Review emails between JCH and oc re discovery responses, phone call to discuss same, etc.
Xiong, Mai	10/8/2020	\$310.00	0.2	62	Review emails between co-counsel and JCH re [REDACTED].
Xiong, Mai	10/8/2020	\$310.00	0.2	62	Review email from JCH re [REDACTED]. Review and save same for file.
Hashmall, Joseph C	10/9/2020	\$550.00	0.3	165	Emails to cocounsel and opposing counsel regarding discovery meet and confer
Xiong, Mai	10/9/2020	\$310.00	0.2	62	Review emails between JCH and co-counsel re scheduling call with oc to discuss discovery.
Hashmall, Joseph C	10/12/2020	\$550.00	0.2	110	Email exchange with to cocounsel regarding discovery responses
Hashmall, Joseph C	10/12/2020	\$550.00	0.1	55	Email to opposing counsel regarding discovery meet and confer call
Xiong, Mai	10/12/2020	\$310.00	0.2	62	Review various emails between JCH and co-counsel re [REDACTED]
Hashmall, Joseph C	10/14/2020	\$550.00	0.3	165	Email exchange with opposing counsel regarding supplemental discovery responses
Xiong, Mai	10/14/2020	\$310.00	0.1	31	Review emails between JCH and opposing counsel re status of def's supplemental discovery responses and schedule call to discuss same.
Drake, E. Michelle	10/15/2020	\$820.00	1	820	prepare for and attend meet and confer on D's discovery responses
Hashmall, Joseph C	10/15/2020	\$550.00	0.7	385	Discovery meet and confer call with opposing counsel

Hashmall, Joseph C	10/15/2020	\$550.00	0.4	220	Review of cocounsel's [REDACTED]
Xiong, Mai	10/15/2020	\$310.00	0.2	62	Review various emails between JCH and co-counsel re [REDACTED]
Hashmall, Joseph C	10/16/2020	\$550.00	2	1100	Editing and drafting Plaintiff's discovery responses, emails to cocounsel regarding same
Xiong, Mai	10/19/2020	\$310.00	0.1	31	Review email from co-counsel re [REDACTED]
Hashmall, Joseph C	10/20/2020	\$550.00	0.2	110	Emails to opposing counsel regarding discovery status
Hashmall, Joseph C	10/20/2020	\$550.00	0.3	165	Emails to cocounsel regarding discovery status
Hashmall, Joseph C	10/20/2020	\$550.00	0.2	110	Internal emails regarding [REDACTED]
Xiong, Mai	10/20/2020	\$310.00	0.2	62	Emails with JCH re [REDACTED]
Xiong, Mai	10/20/2020	\$310.00	0.1	31	Review emails between JCh and opposing counsel re scheduling call to discuss plan for producing docs, etc.
Xiong, Mai	10/20/2020	\$310.00	0.2	62	Review emails between JCh and co-counsel re [REDACTED]
Hashmall, Joseph C	10/21/2020	\$550.00	0.6	330	Internal emails regarding [REDACTED]
Hashmall, Joseph C	10/21/2020	\$550.00	0.7	385	Emails to cocounsel regarding [REDACTED]
Xiong, Mai	10/21/2020	\$310.00	0.2	62	Emails with JCH [REDACTED]
Xiong, Mai	10/21/2020	\$310.00	0.1	31	Review emails between JCH and co-counsel re [REDACTED]
Hashmall, Joseph C	10/22/2020	\$550.00	0.5	275	Call with cocounsel Stone regarding document production
Hashmall, Joseph C	10/22/2020	\$550.00	0.3	165	Call with cocounsel Maxfield regarding discovery responses
Hashmall, Joseph C	10/22/2020	\$550.00	0.5	275	Internal emails regarding [REDACTED]
Hashmall, Joseph C	10/22/2020	\$550.00	0.8	440	Call with opposing counsel regarding discovery production, other issues in case, follow up internal email regarding same
Xiong, Mai	10/22/2020	\$310.00	0.4	124	[REDACTED] Review emails between JCH [REDACTED]. Fill [REDACTED] Emails with Roni, JCH [REDACTED]
Xiong, Mai	10/22/2020	\$310.00	0.5	155	Review emails between JCH, EMD and co-counsel re [REDACTED]. Emails with all re same.
Xiong, Mai	10/22/2020	\$310.00	0.1	31	Review emails between JCH, EMD and co-counsel re [REDACTED]
Hashmall, Joseph C	10/23/2020	\$550.00	1.2	660	Internal emails and emails to cocounsel regarding [REDACTED]
Hashmall, Joseph C	10/23/2020	\$550.00	2.1	1155	Review of [REDACTED]
Hashmall, Joseph C	10/23/2020	\$550.00	1.2	660	Review of and edits to draft discovery responses
Xiong, Mai	10/23/2020	\$310.00	0.2	62	Review emails between JCH, Roni, and Katherine Hunter re [REDACTED]
Xiong, Mai	10/23/2020	\$310.00	0.4	124	Review various emails between JCH and co-counsel re [REDACTED]
Xiong, Mai	10/23/2020	\$310.00	0.3	93	Review various emails between JCH, Roni and [REDACTED]
Xiong, Mai	10/23/2020	\$310.00	0.1	31	Review emails from JCH to EMD re discovery responses.
Xiong, Mai	10/23/2020	\$310.00	0.1	31	Review emails between JCH and opposing counsel re will served diccovery responses and doc production next week.
Hashmall, Joseph C	10/26/2020	\$550.00	1.7	935	Final edits to Plaintiff's discovery responses, emails to cocounsel and internal emails regarding service and execution of same
Xiong, Mai	10/26/2020	\$310.00	0.2	62	Review emails from Katherine re [REDACTED]
Xiong, Mai	10/26/2020	\$310.00	1	310	Finalize discovery responses. Emails with JCH re same. Review emails between JCH and co-counsel re same. [REDACTED]. Emails with co-counsel re same. Email to opposing counsel re discovery responses and link to document production and password for same.
Hashmall, Joseph C	10/27/2020	\$550.00	0.2	110	Internal emails regarding [REDACTED]
Hashmall, Joseph C	10/27/2020	\$550.00	0.3	165	Internal emails regarding loading of Defendant's production into document management system
Hashmall, Joseph C	10/27/2020	\$550.00	0.6	330	Email exchange with Defendant regarding data production, email to cocounsel regarding same
Xiong, Mai	10/27/2020	\$310.00	0.1	31	Review emails between JCH and opposing counsel re rolling productions subject to qualifications.
Xiong, Mai	10/27/2020	\$310.00	0.3	93	Review and save [REDACTED]. Emails with Kimberly Williams [REDACTED]. [REDACTED] Emails with JCH re [REDACTED] Assemble fully executed answers to interrogatories. Email to opposing counsel re same.
Xiong, Mai	10/27/2020	\$310.00	0.2	62	Emails with JCH re uploading defendant's production to Relativity (and splitting up PDFs). Emails to [REDACTED]
Hashmall, Joseph C	10/28/2020	\$550.00	0.3	165	Review of [REDACTED]
Hashmall, Joseph C	10/28/2020	\$550.00	2.5	1375	Review of Defendant's document production, internal emails regarding [REDACTED]

Xiong, Mai	10/28/2020	\$310.00	0.2	62	Emails with [REDACTED]. Review emails between JCH [REDACTED]
Hashmall, Joseph C	10/29/2020	\$550.00	0.2	110	Email exchange with opposing counsel regarding Defendant's data production
Xiong, Mai	10/29/2020	\$310.00	0.1	31	Review emails between JCH and opposing counsel re discovery responses and issues related to same.
Hashmall, Joseph C	11/2/2020	\$550.00	0.2	110	Review of email from opposing counsel regarding data production, response to same
Xiong, Mai	11/2/2020	\$310.00	0.1	31	Review emails between expected document production, discovery response supplementation, call to discuss same.
Albanese, John G	11/4/2020	\$640.00	0.1	64	Meet with case team regarding [REDACTED]
Drake, E. Michelle	11/4/2020	\$820.00	0.1	82	internal meeting with litigation team re schedule and next steps in litigation
Hashmall, Joseph C	11/4/2020	\$550.00	0.1	55	Litigation team meeting
Hashmall, Joseph C	11/5/2020	\$550.00	0.1	55	Email exchange with opposing counsel regarding data production
Xiong, Mai	11/5/2020	\$310.00	0.1	31	Review emails between JCH and co-counsel re supplementing discov responses, etc.
Hashmall, Joseph C	11/10/2020	\$550.00	0.3	165	Email exchange with opposing counsel regarding data production
Xiong, Mai	11/10/2020	\$310.00	0.1	31	Review emails between JCH and oc re status of discovery responses/production.
Hashmall, Joseph C	11/12/2020	\$550.00	0.2	110	Email exchange with opposing counsel regarding data production
Hashmall, Joseph C	11/16/2020	\$550.00	0.3	165	Email exchange with opposing counsel regarding Defendant's data production
Hashmall, Joseph C	11/18/2020	\$550.00	0.7	385	Review of data spreadsheet produced by Defendant, internal emails and email to opposing counsel regarding same
Xiong, Mai	11/18/2020	\$310.00	0.2	62	Review email from oc re def's supplemental responses to 1st set of irrogs and final discovery spreadsheet. Review and save copies of same for file. Review emails between JCH and oc re same and phone call to discuss discovery.
Hashmall, Joseph C	11/19/2020	\$550.00	0.3	165	Call with opposing counsel to discuss data production
Hashmall, Joseph C	11/19/2020	\$550.00	0.8	440	Review of Defendant's production in advance of call with opposing counsel, internal email [REDACTED]
Albanese, John G	11/23/2020	\$640.00	0.1	64	Case meeting with litigation team.
Drake, E. Michelle	11/23/2020	\$820.00	0.1	82	meet with litigation team re case status, deadlines, and next steps
Hashmall, Joseph C	11/23/2020	\$550.00	0.1	55	Litigation team meeting
Xiong, Mai	11/23/2020	\$310.00	0.1	31	Meet with team re status of case, next steps, etc.
Hashmall, Joseph C	12/1/2020	\$550.00	0.3	165	Internal emails regarding [REDACTED]
Hashmall, Joseph C	12/1/2020	\$550.00	0.1	55	Email to opposing counsel regarding document production
Xiong, Mai	12/1/2020	\$310.00	0.1	31	Review scanned mail images from office (paper copy of Def's supplemental answers to 1st set of IRROGS etc).
Xiong, Mai	12/1/2020	\$310.00	0.1	31	Review scanned mail images from office (paper copy of Def's supplemental answers to 1st set of IRROGS etc).
Hashmall, Joseph C	12/14/2020	\$550.00	0.2	110	Email to law clerk regarding [REDACTED]
Hashmall, Joseph C	12/16/2020	\$550.00	0.5	275	Review of Defendant's most recent data production, emails to opposing counsel regarding same, as well as case schedule
Xiong, Mai	12/16/2020	\$310.00	0.2	62	Review emails between JCH and oc re second spreadsheet and status of review, etc. Save copy of spreadsheet for file.
Albanese, John G	12/17/2020	\$640.00	0.1	64	Meet with case team regarding [REDACTED]
Hashmall, Joseph C	12/17/2020	\$550.00	0.1	55	Litigation team meeting
Xiong, Mai	12/21/2020	\$310.00	0.2	62	Review and save cover letter, Def's 1st Suppl Answers to Plf's 2nd Set of IRROGS, certification by counsel of designation of information as confidential, and initial discovery sheet.
Hashmall, Joseph C	12/29/2020	\$550.00	0.3	165	Email exchange with opposing counsel regarding data review status
Xiong, Mai	12/29/2020	\$310.00	0.1	31	Review emails between JCH and oc re status of review process.
Hashmall, Joseph C	12/31/2020	\$550.00	0.4	220	Emails with opposing counsel and cocounsel regarding next steps in case
Xiong, Mai	1/5/2021	\$310.00	0.1	31	Review emails between co-counsel and oc re status of extension to file motion to compel.
Hashmall, Joseph C	1/6/2021	\$550.00	0.2	110	Email to opposing counsel regarding discovery responses
Hashmall, Joseph C	1/8/2021	\$550.00	0.3	165	Email exchange with opposing counsel regarding extension of deadlines in case
Xiong, Mai	1/8/2021	\$310.00	0.1	31	Review emails between JCH and oc re filing motion asking the court for a 90 day extension of the current deadlines.
Hashmall, Joseph C	1/13/2021	\$550.00	0.3	165	Review of and edits to draft stipulation extending deadlines
Hashmall, Joseph C	1/19/2021	\$550.00	0.1	55	Email to opposing counsel regarding request for stay
Xiong, Mai	1/20/2021	\$310.00	0.3	93	Review and save docket track report from WestLaw. Review and save pleadings from WestLaw.
Hashmall, Joseph C	1/21/2021	\$550.00	0.2	110	Email to opposing counsel regarding timing of discovery
Hashmall, Joseph C	1/22/2021	\$550.00	0.2	110	Review of inquiry [REDACTED]
Albanese, John G	1/25/2021	\$640.00	0.1	64	Discuss [REDACTED] with litigaiton team

Drake, E. Michelle	1/25/2021	\$820.00	0.1	82	meet with team re [REDACTED]
Hashmall, Joseph C	1/25/2021	\$550.00	0.2	110	Litigation team meeting
Hashmall, Joseph C	1/25/2021	\$550.00	1.2	660	Researching [REDACTED]
Xiong, Mai	1/25/2021	\$310.00	0.4	124	Review and save amended scheduling order for file. Calendar dates and deadlines.
Xiong, Mai	1/25/2021	\$310.00	0.1	31	Review and save docket track report from WestLaw.
Hashmall, Joseph C	1/27/2021	\$550.00	0.4	220	Research [REDACTED]
Xiong, Mai	1/27/2021	\$310.00	0.1	31	Review email from Jean re mail received at the office (copy of scheduling order).
Hashmall, Joseph C	1/28/2021	\$550.00	0.5	275	Emails with law clerk regarding [REDACTED]
Hashmall, Joseph C	2/4/2021	\$550.00	0.2	110	Email exchange with opposing counsel regarding production schedule
Hashmall, Joseph C	2/4/2021	\$550.00	0.3	165	Internal emails with law clerk regarding research project
Hashmall, Joseph C	2/8/2021	\$550.00	0.2	110	Emails with law clerk regarding research assignment
Hashmall, Joseph C	2/10/2021	\$550.00	0.1	55	Email to opposing counsel regarding production schedule
Hashmall, Joseph C	2/12/2021	\$550.00	0.7	385	Review of Defendant's third production, emails to opposing counsel, internal emails and emails to cocounsel regarding same
Xiong, Mai	2/12/2021	\$310.00	0.1	31	Review and save third spreadsheet produced by Lexington Medical.
Hashmall, Joseph C	2/15/2021	\$550.00	0.6	330	Review of Defendant's production, internal email regarding [REDACTED], related research
Drake, E. Michelle	2/16/2021	\$820.00	0.3	246	review data
Hashmall, Joseph C	2/16/2021	\$550.00	0.4	220	Internal emails regarding discovery status, next steps in case
Hashmall, Joseph C	2/18/2021	\$550.00	0.5	275	Research regarding [REDACTED]
Hashmall, Joseph C	2/18/2021	\$550.00	0.2	110	Internal emails regarding [REDACTED]
Hashmall, Joseph C	2/19/2021	\$550.00	0.3	165	Research regarding [REDACTED]
Hashmall, Joseph C	2/22/2021	\$550.00	0.3	165	Review of email from opposing counsel regarding data sample, response to same
Hashmall, Joseph C	2/23/2021	\$550.00	0.1	55	Email exchange with opposing counsel regarding time to discuss settlement
Hashmall, Joseph C	2/24/2021	\$550.00	0.5	275	Review of additional disclosures by Defendant, emails to opposing counsel regarding same
Hashmall, Joseph C	2/26/2021	\$550.00	0.4	220	Call with opposing counsel regarding settlement of case
Hashmall, Joseph C	2/26/2021	\$550.00	1.2	660	Researching and drafting [REDACTED]
Hashmall, Joseph C	2/26/2021	\$550.00	0.6	330	Review of case file [REDACTED] in advance of call with opposing counsel
Albanese, John G	3/1/2021	\$640.00	0.1	64	Discuss [REDACTED] wit case team
Hashmall, Joseph C	3/1/2021	\$550.00	2	1100	Researching and drafting [REDACTED], internal emails and emails to cocounsel regarding same
Hashmall, Joseph C	3/1/2021	\$550.00	0.1	55	Litigation team meeting
Xiong, Mai	3/1/2021	\$310.00	0.2	62	Emails with JCH re [REDACTED].
Xiong, Mai	3/1/2021	\$310.00	0.2	62	Review and save emails between JCH and co-counsel [REDACTED].
Xiong, Mai	3/1/2021	\$310.00	0.1	31	Meet with team re status of case, next steps, etc.
Drake, E. Michelle	3/2/2021	\$820.00	0.5	410	review redline and revise [REDACTED]
Hashmall, Joseph C	3/2/2021	\$550.00	0.5	275	Edits to demand letter, email exchange with Michelle Drake regarding same
Drake, E. Michelle	3/3/2021	\$820.00	0.3	246	final review and redline of [REDACTED]
Hashmall, Joseph C	3/3/2021	\$550.00	0.2	110	Email to cocounsel regarding [REDACTED]
Hashmall, Joseph C	3/3/2021	\$550.00	0.6	330	Review of edits [REDACTED], further edits to same, internal emails regarding same
Hashmall, Joseph C	3/4/2021	\$550.00	0.3	165	Call with cocounsel regarding [REDACTED], email to cocounsel regarding same
Hashmall, Joseph C	3/4/2021	\$550.00	0.5	275	Edits to [REDACTED], email to opposing counsel attaching same
Xiong, Mai	3/4/2021	\$310.00	0.1	31	Review emails between JCH and Mark re [REDACTED]
Xiong, Mai	3/4/2021	\$310.00	0.3	93	Review multiple emails between JCH and co-counsel re [REDACTED] phone call to discuss same, and each firm's [REDACTED]. Review and save co-counsel's [REDACTED]. Review email from JCH re same.
Xiong, Mai	3/4/2021	\$310.00	0.1	31	Review email from JCH to opposing counsel re settlement demand letter.
Hashmall, Joseph C	3/8/2021	\$550.00	0.6	330	Email to opposing counsel regarding settlement, class certification
Xiong, Mai	3/8/2021	\$310.00	0.2	62	Review and save emails between JCH and oc re preliminary settlement discussions.
Hashmall, Joseph C	3/16/2021	\$550.00	0.3	165	Review of settlement letter, case status, voicemail to opposing counsel regarding same
Hashmall, Joseph C	3/17/2021	\$550.00	0.1	55	Email to cocounsel regarding next steps in case
Hashmall, Joseph C	3/17/2021	\$550.00	0.3	165	Email exchange with cocounsel regarding [REDACTED]
Hashmall, Joseph C	3/17/2021	\$550.00	0.2	110	Email exchange with opposing counsel regarding potential settlement
Drake, E. Michelle	3/22/2021	\$820.00	0.4	328	call with J. Hashmall re next steps in litigation, review emails [REDACTED]
Hashmall, Joseph C	3/22/2021	\$550.00	0.4	220	Call with Michelle Drake regarding [REDACTED]
Hashmall, Joseph C	3/22/2021	\$550.00	0.6	330	Emails with opposing counsel, cocounsel regarding case schedule and discovery
Hashmall, Joseph C	3/23/2021	\$550.00	0.6	330	Email to cocounsel regarding [REDACTED], etc.

Xiong, Mai	3/23/2021	\$310.00	0.2	62	Review and save emails between JCH and co-counsel re [REDACTED]
Hashmall, Joseph C	3/24/2021	\$550.00	0.8	440	Drafting internal email regarding next steps in case, including 30b6 outline, email to cocounsel regarding [REDACTED]
Hashmall, Joseph C	3/24/2021	\$550.00	0.5	275	Review of schedule in case, drafting proposal for extension
Hashmall, Joseph C	3/24/2021	\$550.00	0.3	165	Call with opposing counsel regarding deposition schedule and case schedule
Xiong, Mai	3/24/2021	\$310.00	0.2	62	Review emails between JCH and co-counsel re next steps, moving forward with 30b6, plaintiff depo availability.
Hashmall, Joseph C	3/25/2021	\$550.00	0.5	275	Email exchange with Michelle Drake regarding deposition [REDACTED]
Hashmall, Joseph C	3/25/2021	\$550.00	2.2	1210	Review of class data, drafting related requests for admission, internal emails regarding same
Drake, E. Michelle	3/26/2021	\$820.00	0.8	656	email with J.hashmall re additional written discover [REDACTED]
Hashmall, Joseph C	3/26/2021	\$550.00	0.7	385	Emails with cocounsel regarding [REDACTED]
Hashmall, Joseph C	3/26/2021	\$550.00	1.3	715	Edits to draft RFAs, email to opposing counsel serving same, discussing deposition schedule
Hashmall, Joseph C	3/29/2021	\$550.00	0.4	220	Email to opposing counsel regarding scheduling of Jones deposition, email to cocounsel regarding other clients' depositions
Hashmall, Joseph C	3/29/2021	\$550.00	0.5	275	Review [REDACTED]
Hashmall, Joseph C	3/29/2021	\$550.00	0.2	110	Follow up email to client Jones [REDACTED]
Hashmall, Joseph C	3/29/2021	\$550.00	0.2	110	Follow up email to client Jones [REDACTED]
Hashmall, Joseph C	3/29/2021	\$550.00	0.5	275	Zoom call with client Jones [REDACTED]
Hashmall, Joseph C	3/30/2021	\$550.00	0.5	275	Emails to cocounsel and opposing counsel regarding deposition logistics, client communications
Xiong, Mai	3/30/2021	\$310.00	0.3	93	Review emails between JCH and co-counsel re scheduling plaintiffs depositions and 30b6 depo.
Hashmall, Joseph C	3/31/2021	\$550.00	0.5	275	Attempted Zoom call with client Mayers, follow up emails to client [REDACTED]
Hashmall, Joseph C	3/31/2021	\$550.00	0.7	385	Emails to opposing counsel, cocounsel and internal emails regarding deposition scheduling
Xiong, Mai	3/31/2021	\$310.00	0.2	62	Review and save emails between JCH and co-counsel re plaintiffs' availability for depositions.
Xiong, Mai	3/31/2021	\$310.00	0.2	62	Review and save emails between JCH and oc re scheduling depositions and extending case deadlines.
Hashmall, Joseph C	4/1/2021	\$550.00	0.7	385	Call with client Mayers regarding upcoming deposition, follow up email regarding same
Hashmall, Joseph C	4/1/2021	\$550.00	0.5	275	Emails with opposing counsel and cocounsel regarding upcoming depositions
Hashmall, Joseph C	4/1/2021	\$550.00	0.6	330	Internal email regarding drafting of 30b6 notice, review of draft notice
Xiong, Mai	4/1/2021	\$310.00	0.4	124	Prepare 30b6 depo notice with topics. Emails with JCH re same. Update calendar.
Xiong, Mai	4/1/2021	\$310.00	0.2	62	Review and save multiple emails between JCH and oc re scheduling depositions and extending case deadlines. Update calendar.
Hashmall, Joseph C	4/2/2021	\$550.00	0.5	275	Internal emails regarding [REDACTED]
Hashmall, Joseph C	4/2/2021	\$550.00	0.3	165	Email to client Williams [REDACTED]
Hashmall, Joseph C	4/2/2021	\$550.00	0.2	110	Email to opposing counsel regarding deposition notices, other logistics
Hashmall, Joseph C	4/2/2021	\$550.00	0.5	275	Emails to clients [REDACTED]
Hashmall, Joseph C	4/2/2021	\$550.00	0.4	220	Emails to cocounsel regarding [REDACTED]
Xiong, Mai	4/2/2021	\$310.00	0.2	62	Review and save emails between JCH and co-counsel re [REDACTED]. Review and save email from JCH [REDACTED]
Xiong, Mai	4/2/2021	\$310.00	0.2	62	Review and save emails between JCH and oc confirming depo dates for plaintiffs and defendant's 30b6.
Hashmall, Joseph C	4/5/2021	\$550.00	0.2	110	Internal email regarding upcoming depositions in case
Hashmall, Joseph C	4/5/2021	\$550.00	0.6	330	Review of and edits to draft 30b6 notice, other discovery in case
Hashmall, Joseph C	4/6/2021	\$550.00	1.2	660	Edits to draft stipulation dismissing party, final review of 30b6 notice, email to opposing counsel attaching both
Xiong, Mai	4/6/2021	\$310.00	0.2	62	Review and save email from JCH to oc re 30b6 depo notice [REDACTED]
Xiong, Mai	4/6/2021	\$310.00	0.2	62	Emails with Lexitas re 30b6 depo.
Xiong, Mai	4/6/2021	\$310.00	0.2	62	Create case and depo for 30b6 in AgileLaw. Emails with JCH re same.
Xiong, Mai	4/6/2021	\$310.00	0.3	93	Prepare stipulation for dismissal of Kimberly Williams from case. Emails with JCH re same
Hashmall, Joseph C	4/9/2021	\$550.00	0.4	220	Review of case schedule, email to opposing counsel regarding extension of same
Hashmall, Joseph C	4/9/2021	\$550.00	5	2750	Review of case documents in advance of 30b6. Organizing and labeling deposition exhibits, flagging portions of documents for use in deposition
Xiong, Mai	4/9/2021	\$310.00	0.2	62	Review and save email from JCH to oc re filing stip for dismissal of Plaintiff Williams.
Hashmall, Joseph C	4/12/2021	\$550.00	0.2	110	Internal emails regarding draft extension of time

Hashmall, Joseph C	4/12/2021	\$550.00	0.3	165	Email exchange with opposing counsel regarding motion to withdraw, upcoming depositions
Hashmall, Joseph C	4/12/2021	\$550.00	3	1650	Review of exhibits for upcoming 30b6, organizing outline of same
Xiong, Mai	4/12/2021	\$310.00	0.2	62	Review and save emails between JCH and oc re stipulation dismissing plaintiff Williams.
Hashmall, Joseph C	4/13/2021	\$550.00	0.3	165	Revisions to draft stipulation regarding withdrawal of plaintiff email to opposing counsel regarding same
Hashmall, Joseph C	4/13/2021	\$550.00	0.5	275	Emails to clients ██████████
Xiong, Mai	4/13/2021	\$310.00	0.2	62	Review and save emails between JCH and oc re stipulation dismissing plaintiff Williams, extending deadlines, etc.
Hashmall, Joseph C	4/14/2021	\$550.00	0.4	220	Email exchanges with clients ██████████
Xiong, Mai	4/14/2021	\$310.00	0.6	186	Review amended scheduling order. Prepare consent motion to extend deadlines. Emails with JCH re same.
Hashmall, Joseph C	4/15/2021	\$550.00	0.4	220	Emails with client, ██████████
Hashmall, Joseph C	4/15/2021	\$550.00	0.4	220	Internal emails, emails with cocounsel and emails with opposing counsel regarding edits to and filing of stipulation for extension of time
Xiong, Mai	4/15/2021	\$310.00	0.2	62	Review and save emails between JCH and oc re draft motion for extension of deadlines, start time for plaintiff depositions, stipulation to dismiss Kim Williams.
Xiong, Mai	4/15/2021	\$310.00	0.7	217	Finalize consent motion to extend deadlines. Review local rules re signatures, etc. Emails with JCH re same. Review local rules, ECF rules, etc re registration for ECF filing for EMD/JCH. Coordinate ECF filing of same.
Xiong, Mai	4/15/2021	\$310.00	0.2	62	Review and save emails between JCH and co-counsel re filing of motion for extension of deadlines.
Hashmall, Joseph C	4/16/2021	\$550.00	0.2	110	Internal emails regarding logistics for upcoming deposition
Xiong, Mai	4/16/2021	\$310.00	0.2	62	Emails with JCH re notices for plaintiff's depositions (not served yet).
Xiong, Mai	4/16/2021	\$310.00	0.2	62	Emails with Lexitax re scheduling court reporter for 30(b)(6) depo.
Hashmall, Joseph C	4/19/2021	\$550.00	0.6	330	Email exchange with opposing counsel regarding upcoming depositions, stipulation withdrawing Williams, internal emails and email to cocounsel regarding same
Hashmall, Joseph C	4/19/2021	\$550.00	0.2	110	Review of Court's order regarding schedule, internal email regarding same
Hashmall, Joseph C	4/20/2021	\$550.00	0.3	165	Review of Defendant's deposition notice, internal email regarding same
Xiong, Mai	4/20/2021	\$310.00	0.2	62	Review and save docket alert report from WestLaw.
Hashmall, Joseph C	4/21/2021	\$550.00	0.4	220	Internal email regarding filing of stipulation, logistics for upcoming depositions
Xiong, Mai	4/21/2021	\$310.00	0.3	93	Review and save defendant's notice of depositions for file. Review and save email from oc re zoom details for plaintiffs depositions. Update calendar.
Xiong, Mai	4/21/2021	\$310.00	0.2	62	Review and save emails between JCH and oc re status of stip withdrawing Plaintiff Williams, plaintiffs depositions, 30(b)(6) depo, etc.
Xiong, Mai	4/21/2021	\$310.00	0.6	186	Review and save order granting motion for extension of schedule. Calendar extended deadlines and reminders.
Xiong, Mai	4/21/2021	\$310.00	0.2	62	Review and save emails between JCH and co-counsel re approval and filing of stip to dismiss Plaintiff Williams.
Xiong, Mai	4/21/2021	\$310.00	0.3	93	Emails with JCH re filing stipulation dismissing Plaintiff Williams. Finalize and coordinate ECF filing of same.
Hashmall, Joseph C	4/22/2021	\$550.00	0.8	440	Emails with ██████████
Hashmall, Joseph C	4/22/2021	\$550.00	0.6	330	Emails with court reporters and opposing counsel regarding logistics for upcoming depositions
Hashmall, Joseph C	4/22/2021	\$550.00	0.3	165	Review of communication from court clerk regarding stipulation of dismissal, internal emails regarding re-filing of same
Hashmall, Joseph C	4/22/2021	\$550.00	2.6	1430	Review of outline and exhibits for upcoming 30b6
Xiong, Mai	4/22/2021	\$310.00	0.2	62	Create ██████████.
Xiong, Mai	4/22/2021	\$310.00	0.2	62	Review and save letter from oc re defendant's third supplemental answers to first set of interrogatories.
Xiong, Mai	4/22/2021	\$310.00	0.3	93	Review docket alert report from WestLaw. Download and save new pleadings for file.
Xiong, Mai	4/22/2021	\$310.00	0.2	62	Review and save docket alert report from WestLaw. Download and save e-filed docs for file.
Xiong, Mai	4/22/2021	\$310.00	0.4	124	Review and save emails between EMD and bankruptcy court re issue with electronic signature requirement for bankruptcy court. Emails with JCH and EMD re same. Review local rule re e-signatures. Amend and re-file stipulation for dismissal of Plaintiff Williams. Coordinate ECF filing of same.
Xiong, Mai	4/22/2021	\$310.00	0.2	62	Review and save emails between JCH and oc re supplementing spreadsheets, shipping of tablets for 30(b)(6) depo, exhibits for plaintiffs' depositions, etc.
Xiong, Mai	4/22/2021	\$310.00	0.8	248	Charge tablets and install updates. Prepare FedEx shipping label to opposing counsel and return shipping label. Emails with oc's office re tracking number, AgileLaw info sheet, etc. Travel to and from FedEx to drop off package.

Xiong, Mai	4/22/2021	\$310.00	0.3	93	Emails with JCH re logistics for 30(b)(6) depo. Emails with Lexitas re AgileLaw info sheet and logistics/details for 30(b)(6) depo.
Albanese, John G	4/23/2021	\$640.00	0.1	64	Meet with case team regarding [REDACTED]
Drake, E. Michelle	4/23/2021	\$820.00	0.1	82	team meeting to discuss deadlines and next steps in litigation
Hashmall, Joseph C	4/23/2021	\$550.00	0.5	275	Review of exhibits for upcoming 30b6
Hashmall, Joseph C	4/23/2021	\$550.00	0.4	220	Email exchange with clients [REDACTED]
Hashmall, Joseph C	4/23/2021	\$550.00	0.2	110	Litigation team meeting
Hashmall, Joseph C	4/23/2021	\$550.00	0.5	275	Review of Defendant's request for admissions responses
Xiong, Mai	4/23/2021	\$310.00	0.2	62	Meet with team re status of case, nex steps, etc.
Hashmall, Joseph C	4/26/2021	\$550.00	0.8	440	[REDACTED] follow up email regarding same
Hashmall, Joseph C	4/26/2021	\$550.00	1	550	[REDACTED] follow up email regarding same
Xiong, Mai	4/26/2021	\$310.00	0.2	62	Review and save email from oc re responses to Request for Admissions, Set II. Review and save copy of same for file.
Hashmall, Joseph C	4/27/2021	\$550.00	2.2	1210	Prep and review of documents in advance of 30b6
Xiong, Mai	4/27/2021	\$310.00	0.2	62	Review and save zoom details from Lexitas for 30(b)(6) depo. Update calendar. Emails with Lexitas confirming details for depo.
Xiong, Mai	4/27/2021	\$310.00	0.3	93	Emails with oc's office re receipt of tablets and AgileLaw PIN (to be provided later). Emails with JCH re zoom details. Emails with oc's office re zoom details.
Hashmall, Joseph C	4/28/2021	\$550.00	0.8	440	Emails with clients [REDACTED]
Hashmall, Joseph C	4/28/2021	\$550.00	2.2	1210	Review of exhibits and edits to outline for upcoming 30b6 deposition
Xiong, Mai	4/28/2021	\$310.00	0.3	93	Review and save order for service of final report and recommendation dismissing claims with prejudice, deadline to file objections to same. Calendar same.
Xiong, Mai	4/28/2021	\$310.00	0.2	62	Review and save emails between JCH and Lexitas re location of 30b6 witness for depo. Review email from Lexitas confirming details for 30b6 depo.
Xiong, Mai	4/28/2021	\$310.00	0.2	62	Review and save emails between JCH and oc re logistics for 30b6 depo.
Xiong, Mai	4/28/2021	\$310.00	0.4	124	Review and save emails between JCH and oc re link to download exhibits for Plaintiffs depositions and logistics for same. Review and save emails between JCH and oc re Plaintiff's addresses to send exhibits for depositions.
Xiong, Mai	4/28/2021	\$310.00	0.2	62	Review and save emails between JCH and Teri Mayers re [REDACTED]. Emails with JCH re same.
Xiong, Mai	4/28/2021	\$310.00	0.2	62	Review and save emails between JCH and Jeremiah Jones [REDACTED]. Emails with JCH re same.
Hashmall, Joseph C	4/29/2021	\$550.00	0.4	220	Review of exhibits produced for Plaintiffs' upcoming depositions, notes regarding same
Hashmall, Joseph C	4/29/2021	\$550.00	4.5	2475	Conducting 30b6 of defendant, follow up emails to cocounsel, court reporter, internal emails regarding same
Hashmall, Joseph C	4/29/2021	\$550.00	0.4	220	Emails to clients [REDACTED]
Xiong, Mai	4/29/2021	\$310.00	0.2	62	Review and save emails between JCH and Dave Maxfield re login details for depositions today and tomorrow. Email to Dave re same.
Xiong, Mai	4/29/2021	\$310.00	0.2	62	Review and save multiple emails between JCH and oc re setting up for 3b6 depo and logging into depo.
Xiong, Mai	4/29/2021	\$310.00	0.4	124	Review and save emails between JCH and oc re exhibits for plaintiffs' depositions. Download and save exhibits from oc's office for plaintiffs' depositions. Email to JCH and co-counsel re same. Review and save email from oc re login details for Plaintiffs' depositions.
Hashmall, Joseph C	4/30/2021	\$550.00	3.2	1760	Defend deposition of Plaintiff Mayers
Hashmall, Joseph C	4/30/2021	\$550.00	2	1100	Defend deposition of Plaintiff Jones
Hashmall, Joseph C	4/30/2021	\$550.00	0.2	110	Internal email regarding next steps in case post-depositions
Hashmall, Joseph C	4/30/2021	\$550.00	0.5	275	Calls and emails with Plaintiffs Jones and Meyers [REDACTED]
Xiong, Mai	5/6/2021	\$310.00	0.2	62	Review and save email from Jean re scanned mail received at office.
Xiong, Mai	5/6/2021	\$310.00	0.2	62	Review FedEx package containing tablets returned from depositions. Upload tablet tracking spreadsheet.
Hashmall, Joseph C	5/10/2021	\$550.00	0.3	165	Email exchange with cocounsel regarding next steps in case, upcoming motions
Hashmall, Joseph C	5/11/2021	\$550.00	1	550	Outlining motion for class certification
Hashmall, Joseph C	5/11/2021	\$550.00	0.6	330	Review of 30(b)(6) transcript
Xiong, Mai	5/11/2021	\$310.00	0.3	93	Review and save email from Lexitas re final transcript and exhibits for Turner depo. Download and save copies of transcripts and exhibits for file. Review and save emails from JCH re same.
Hashmall, Joseph C	5/13/2021	\$550.00	0.4	220	Outlining motion for class certification
Hashmall, Joseph C	5/20/2021	\$550.00	1.6	880	Outlining motion for class certification
Hashmall, Joseph C	5/21/2021	\$550.00	0.2	110	Review of voicemail [REDACTED]

Hashmall, Joseph C	5/27/2021	\$550.00	0.7	385	Emails with court reporter regarding named plaintiff's depo transcripts, preliminary review of same
Xiong, Mai	5/27/2021	\$310.00	0.3	93	Review and save emails between JCH and Veritext re our file number, transcripts for Jeremiah Jones and Teri Mayers, etc. Review and save transcripts [REDACTED] for file.
Hashmall, Joseph C	5/28/2021	\$550.00	1	550	Review of discovery materials [REDACTED]
Hashmall, Joseph C	5/28/2021	\$550.00	0.3	165	Final review of [REDACTED], internal email regarding same
Hibray, Jean K	6/6/2021	\$370.00	0.2	74	Draft, send for review - Notice of Change of Address
Hashmall, Joseph C	6/7/2021	\$550.00	0.3	165	Review of and internal emails regarding notice of change of address
Hashmall, Joseph C	6/7/2021	\$550.00	0.2	110	Review and approval of invoice for deposition transcript
Hashmall, Joseph C	6/7/2021	\$550.00	3.1	1705	Drafting brief in support of motion for class certification
Hibray, Jean K	6/7/2021	\$370.00	0.1	37	Email with local re address change
Hashmall, Joseph C	6/8/2021	\$550.00	0.7	385	Outlining and drafting motion for class certification
Hashmall, Joseph C	6/8/2021	\$550.00	2.4	1320	Review of deposition transcripts [REDACTED]
Hashmall, Joseph C	6/9/2021	\$550.00	2.4	1320	Outlining and drafting motion for class certification
Hashmall, Joseph C	6/16/2021	\$550.00	0.2	110	[REDACTED] to client Mayers
Hashmall, Joseph C	6/23/2021	\$550.00	0.4	220	Review of current status of draft motion for class certification, outline for completion of same
Hashmall, Joseph C	7/20/2021	\$550.00	3.4	1870	Review [REDACTED] drafting class certification motion
Hashmall, Joseph C	7/21/2021	\$550.00	4.9	2695	Drafting brief in support of motion for class certification
Hashmall, Joseph C	7/22/2021	\$550.00	2.5	1375	Drafting brief in support of motion for class certification
Hibray, Jean K	7/22/2021	\$370.00	0.9	333	Research rules/procedures for memo in support of class cert
Hashmall, Joseph C	7/23/2021	\$550.00	0.1	55	Email exchange with cocounsel regarding page limits
Drake, E. Michelle	7/24/2021	\$820.00	2	1640	review redline and revise class cert motion
Albanese, John G	7/26/2021	\$640.00	0.1	64	Internal team litigation meeting.
Hashmall, Joseph C	7/26/2021	\$550.00	0.5	275	Review of [REDACTED], follow up edits to same, internal emails regarding same
Hashmall, Joseph C	7/26/2021	\$550.00	0.1	55	Litigation team meeting
Hashmall, Joseph C	7/27/2021	\$550.00	0.3	165	Emails with cocounsel regarding [REDACTED]
Hashmall, Joseph C	7/27/2021	\$550.00	0.8	440	Edits to draft motion for class certification
Hibray, Jean K	7/27/2021	\$370.00	0.9	333	Draft motion for class cert, order re same
Hashmall, Joseph C	7/28/2021	\$550.00	1.8	990	Edits to brief in support of class certification
Hashmall, Joseph C	7/30/2021	\$550.00	1.1	605	Edits to draft motion for class certification, internal emails regarding same
Hashmall, Joseph C	7/30/2021	\$550.00	0.3	165	Emails with cocounsel regarding declarations in support of motion for class certification
Hashmall, Joseph C	7/30/2021	\$550.00	0.3	165	Review of draft declarations in support of class certification: Maxfeld, Jones and Mayers
Hibray, Jean K	7/30/2021	\$370.00	0.8	296	Draft declarations of co-counsel, plaintiffs, to support class cert
Hashmall, Joseph C	8/2/2021	\$550.00	0.2	110	Internal emails regarding status of motion for class certification
Hashmall, Joseph C	8/5/2021	\$550.00	0.4	220	Review of email from opposing counsel regarding settlement, internal emails regarding same
Hashmall, Joseph C	8/5/2021	\$550.00	0.2	110	Internal email regarding draft brief in support of class certification
Drake, E. Michelle	8/6/2021	\$820.00	0.3	246	Meet with J Hashmall re class cert memo
Hashmall, Joseph C	8/6/2021	\$550.00	0.5	275	Emails to opposing counsel regarding settlement demand, call with Michelle Drake regarding same
Hashmall, Joseph C	8/6/2021	\$550.00	0.3	165	Call with Michelle Drake regarding [REDACTED]
Hashmall, Joseph C	8/9/2021	\$550.00	0.5	275	Final [REDACTED], emails to client [REDACTED]
Hashmall, Joseph C	8/9/2021	\$550.00	2.6	1430	Revisions to brief in support of class certification, internal emails and email to cocounsel regarding same
Gionnette, Julie	8/9/2021	\$220.00	0.3	66	send [REDACTED]
Drake, E. Michelle	8/10/2021	\$820.00	3.4	2788	review redline and revise brief in support of class certification
Hashmall, Joseph C	8/10/2021	\$550.00	0.2	110	Email to client Mayers [REDACTED]
Hashmall, Joseph C	8/10/2021	\$550.00	0.5	275	Review of Defendant's settlement offer, internal email [REDACTED]
Drake, E. Michelle	8/11/2021	\$820.00	0.5	410	email with J Hashmall re [REDACTED]
Hashmall, Joseph C	8/11/2021	\$550.00	0.6	330	Email exchange with opposing counsel re settlement offer, [REDACTED]
Hashmall, Joseph C	8/11/2021	\$550.00	2.2	1210	Review of Michelle Drake's edits to class certification brief, further edits to same, internal emails regarding finalizing motion for class certification for filing
Drake, E. Michelle	8/12/2021	\$820.00	0.3	246	review and approve supporting documents

Hashmall, Joseph C	8/12/2021	\$550.00	2.2	1210	Final pre-filing review of proofing edits to motion for class certification, brief and supporting declarations, internal emails regarding same, email exchange with opposing counsel regarding filing of same under seal
Hashmall, Joseph C	8/12/2021	\$550.00	0.3	165	Emails to opposing counsel [REDACTED]
Hibray, Jean K	8/12/2021	\$370.00	0.3	111	Review status of class cert. Respond on outstanding tasks
Hibray, Jean K	8/12/2021	\$370.00	1.5	555	Proof, format memo ISO class cert, proof motion & prop order, prepare declarations, compile exhibits. Email to team for review
Hibray, Jean K	8/12/2021	\$370.00	0.4	148	Emails re [REDACTED]. Redline dec.
Hashmall, Joseph C	8/13/2021	\$550.00	0.5	275	Internal emails and email to cocounsel regarding filing of motion for class certification
Hibray, Jean K	8/13/2021	\$370.00	1.5	555	Finalize and file motion for class cert and all supporting docs. Docket filed versions. Check rules on filing/judge copy
Hashmall, Joseph C	8/18/2021	\$550.00	0.2	110	Internal emails about [REDACTED]
Hashmall, Joseph C	8/19/2021	\$550.00	0.2	110	Email to opposing counsel regarding settlement demand, class certification
Hashmall, Joseph C	8/19/2021	\$550.00	0.1	55	Internal email regarding next steps in case
Drake, E. Michelle	8/30/2021	\$820.00	0.3	246	call with oc re mediation possibility
Hashmall, Joseph C	8/30/2021	\$550.00	0.3	165	Call with opposing counsel regarding settlement
Hashmall, Joseph C	8/30/2021	\$550.00	0.2	110	Emails with opposing counsel setting up settlement call
Hashmall, Joseph C	8/30/2021	\$550.00	0.1	55	Call with Dave Maxfield regarding [REDACTED]
Hashmall, Joseph C	8/31/2021	\$550.00	0.2	110	Email to opposing counsel regarding class certification
Hashmall, Joseph C	9/3/2021	\$550.00	2	1100	Review of Defendant's brief in opposition to class certification, outlining reply to same
Hashmall, Joseph C	9/3/2021	\$550.00	0.6	330	Internal emails and emails to cocounsel regarding reply briefing
Gionnette, Julie	9/3/2021	\$220.00	1	220	download and review docket entries; research local and federal rules re deadline to reply
Hashmall, Joseph C	9/8/2021	\$550.00	0.5	275	Emails with opposing counsel and cocounsel regarding briefing deadlines
Hashmall, Joseph C	9/9/2021	\$550.00	0.3	165	Review of Court order regarding briefing and hearing on class certification, emails with cocounsel regarding same
Gionnette, Julie	9/9/2021	\$220.00	0.3	66	download and review docket entries; calendar deadlines
Hashmall, Joseph C	9/10/2021	\$550.00	0.5	275	Review of Defendant's revised settlement offer, internal emails [REDACTED]
Hashmall, Joseph C	9/13/2021	\$550.00	0.3	165	internal emails regarding [REDACTED]
Gionnette, Julie	9/13/2021	\$220.00	0.1	22	download and review docket entries
Hashmall, Joseph C	9/14/2021	\$550.00	0.3	165	Review of voicemail from opposing counsel regarding settlement, internal emails and email to opposing counsel regarding same
Drake, E. Michelle	9/15/2021	\$820.00	0.2	164	review settlement offer and email with JCH [REDACTED]
Hashmall, Joseph C	9/15/2021	\$550.00	0.3	165	Email to opposing counsel with revised settlement proposal, internal emails regarding same
Hashmall, Joseph C	9/20/2021	\$550.00	0.4	220	Review of revised settlement offer from opposing counsel, internal emails regarding same, sending counteroffer to same
Hashmall, Joseph C	9/21/2021	\$550.00	0.4	220	Review of Defendant's offer, internal emails regarding [REDACTED], email to opposing counsel with counteroffer
Drake, E. Michelle	9/23/2021	\$820.00	0.2	164	emails with oc and J Hashmall re settlement prospects
Hashmall, Joseph C	9/23/2021	\$550.00	0.5	275	Outlining reply in support of class certification
Hashmall, Joseph C	9/23/2021	\$550.00	0.3	165	Call with opposing counsel regarding settlement, phone tag with same prior to call
Hashmall, Joseph C	9/23/2021	\$550.00	0.6	330	Review of revised settlement offers, response to same, internal emails [REDACTED]
Hashmall, Joseph C	9/24/2021	\$550.00	0.3	165	Email to opposing counsel regarding proposed structure of class settlement
Hashmall, Joseph C	9/27/2021	\$550.00	0.5	275	Review of Defendant's revised offer and terms, internal email regarding revised demand
Hashmall, Joseph C	9/27/2021	\$550.00	2.7	1485	Researching and drafting reply in support of class certification
Drake, E. Michelle	9/28/2021	\$820.00	0.5	410	review email chain re [REDACTED], call with J. Hashmall re [REDACTED]
Hashmall, Joseph C	9/28/2021	\$550.00	3	1650	Researching and drafting reply in support of class certification
Hashmall, Joseph C	9/28/2021	\$550.00	0.2	110	Call with Michelle Drake regarding [REDACTED]
Hashmall, Joseph C	9/29/2021	\$550.00	4.2	2310	Researching and drafting reply in support of class certification
Hashmall, Joseph C	9/29/2021	\$550.00	0.9	495	Internal emails regarding [REDACTED], researching and drafting response to opposing counsel regarding same
Hashmall, Joseph C	9/29/2021	\$550.00	0.3	165	Email to cocounsel regarding [REDACTED]
Hashmall, Joseph C	9/30/2021	\$550.00	2.5	1375	Drafting and revising reply in support of motion for class certification, internal emails regarding same
Hashmall, Joseph C	9/30/2021	\$550.00	0.6	330	Internal emails regarding scheduling of hearing on motion for class certification, emails to cocounsel and opposing counsel regarding same
Hashmall, Joseph C	9/30/2021	\$550.00	0.4	220	Emails to cocounsel and opposing counsel regarding settlement talks, internal emails regarding revised demand

Hashmall, Joseph C	10/1/2021	\$550.00	0.6	330	Emails with opposing counsel and internal emails regarding settlement
Hashmall, Joseph C	10/1/2021	\$550.00	1.2	660	Edits to draft reply in support of class certification
Drake, E. Michelle	10/4/2021	\$820.00	2.6	2132	review redline and revise reply in support of class certification
Drake, E. Michelle	10/4/2021	\$820.00	0.2	164	email with J Hashmall re [REDACTED]
Hashmall, Joseph C	10/4/2021	\$550.00	2.3	1265	Edits to reply in support of class certification, internal emails and emails with cocounsel regarding same
Hashmall, Joseph C	10/4/2021	\$550.00	0.3	165	Email exchange with opposing counsel regarding settlement, internal emails [REDACTED]
Hibray, Jean K	10/4/2021	\$370.00	0.5	185	Review rules/procedures in anticipation of filing class cert reply
Hibray, Jean K	10/4/2021	\$370.00	0.9	333	Proof, format reply. Finalize and file same.
Gionnette, Julie	10/4/2021	\$220.00	0.1	22	download and review docket entry
Hashmall, Joseph C	10/5/2021	\$550.00	0.4	220	Review of draft request to move hearing date, internal emails and emails with cocounsel regarding same
Hashmall, Joseph C	10/5/2021	\$550.00	0.2	110	Review of draft [REDACTED]
Hibray, Jean K	10/5/2021	\$370.00	0.8	296	Draft request to continue hearing, check rules re same. Finalize and file.
Hibray, Jean K	10/5/2021	\$370.00	0.3	111	Draft [REDACTED]
Gionnette, Julie	10/5/2021	\$220.00	0.3	66	download and review docket entries; update calendar deadline
Hashmall, Joseph C	10/6/2021	\$550.00	0.4	220	Email exchange with cocounsel regarding [REDACTED]
Hashmall, Joseph C	10/6/2021	\$550.00	0.2	110	Review of email from opposing counsel regarding settlement, internal email exchange [REDACTED]
Hashmall, Joseph C	10/7/2021	\$550.00	0.2	110	Email to opposing counsel regarding settlement demand
Albanese, John G	10/8/2021	\$640.00	0.1	64	Discuss [REDACTED] with litigation team
Drake, E. Michelle	10/8/2021	\$820.00	0.1	82	bi-weekly team check in meeting on upcoming deadlines, case status and next steps
Hashmall, Joseph C	10/8/2021	\$550.00	0.4	220	Review of revised settlement offer from opposing counsel, email in response to same
Hashmall, Joseph C	10/8/2021	\$550.00	0.2	110	Litigation team meeting
Hibray, Jean K	10/8/2021	\$370.00	0.1	37	Case meeting.
Gionnette, Julie	10/8/2021	\$220.00	0.1	22	download and review docket entry
Hashmall, Joseph C	10/13/2021	\$550.00	0.5	275	Emails with opposing counsel regarding settlement, internal emails regarding drafting of settlement agreement
Hashmall, Joseph C	10/15/2021	\$550.00	0.6	330	Internal emails and emails with opposing counsel regarding settlement next steps
Hashmall, Joseph C	10/15/2021	\$550.00	0.6	330	Review of and edits to draft settlement agreement, internal emails regarding same
Hibray, Jean K	10/15/2021	\$370.00	2	740	Draft settlement agreement, circulate to J Hashmall, respond on administrator point.
Hibray, Jean K	10/15/2021	\$370.00	0.8	296	Review emails on settlement terms, review prior dockets, in prep of draft agreement.
Drake, E. Michelle	10/18/2021	\$820.00	1.2	984	review redline and revise draft settlement agreement
Hashmall, Joseph C	10/18/2021	\$550.00	0.8	440	Review of Michelle Drake's edits to draft settlement, further edits to same. Internal emails and emails to opposing counsel regarding same
Hibray, Jean K	10/18/2021	\$370.00	0.3	111	Draft RFP to ACLS for settlement admin bid.
Gionnette, Julie	10/18/2021	\$220.00	0.1	22	download and review docket entry
Hibray, Jean K	10/19/2021	\$370.00	0.1	37	Respond on ALCS request for clarification for RFP
Hashmall, Joseph C	10/20/2021	\$550.00	0.4	220	Email to opposing counsel regarding settlement terms
Hashmall, Joseph C	10/25/2021	\$550.00	0.5	275	Email exchange with opposing counsel regarding settlement status, settlement notice to court
Hashmall, Joseph C	10/26/2021	\$550.00	1.8	990	Review of opposing counsel's edits to settlement agreement, further edits to same, email exchange regarding same
Hashmall, Joseph C	10/26/2021	\$550.00	0.8	440	email exchange with cocounsel regarding [REDACTED]
Hashmall, Joseph C	10/28/2021	\$550.00	0.5	275	Review of Defendant's proposed edits to the settlement, email exchange regarding same. Internal email regarding [REDACTED]
Hashmall, Joseph C	10/28/2021	\$550.00	0.1	55	Email to [REDACTED]
Hibray, Jean K	10/28/2021	\$370.00	0.1	37	Email re admin selection
Hibray, Jean K	10/29/2021	\$370.00	1	370	Draft exhibits for settlement agreement
Drake, E. Michelle	11/1/2021	\$820.00	0.1	82	team meeting re next steps on cases
Hashmall, Joseph C	11/1/2021	\$550.00	1.8	990	Edits to draft settlement, review of draft exhibits to complaint, email to opposing counsel attaching same
Hashmall, Joseph C	11/1/2021	\$550.00	0.5	275	Emails with opposing counsel regarding settlement notice to the court and additional settlement logistics
Hashmall, Joseph C	11/1/2021	\$550.00	0.1	55	Litigation team meeting
Hashmall, Joseph C	11/2/2021	\$550.00	0.5	275	Email exchange with opposing counsel regarding settlement notice to court and settlement logistics, internal email regarding edits to settlement exhibits
Hibray, Jean K	11/2/2021	\$370.00	0.3	111	Update settlement agreement exhibits to include remote hearing concept.

Hashmall, Joseph C	11/3/2021	\$550.00	0.4	220	Review of edits to exhibits to settlement agreement, email to opposing counsel attaching same
Hashmall, Joseph C	11/8/2021	\$550.00	0.3	165	Email exchange with opposing counsel regarding draft settlement status
Hibray, Jean K	11/9/2021	\$370.00	2	740	Drafting of prelim approval memo
Hashmall, Joseph C	11/10/2021	\$550.00	0.1	55	Email exchange with opposing counsel regarding status of draft settlement
Hibray, Jean K	11/10/2021	\$370.00	2	740	Continue draft of prelim approval memo
Hashmall, Joseph C	11/11/2021	\$550.00	0.3	165	Email exchange with opposing counsel regarding draft settlement
Hashmall, Joseph C	11/11/2021	\$550.00	0.5	275	Call and email to client Jones [REDACTED]
Hashmall, Joseph C	11/11/2021	\$550.00	0.5	275	Call and email to client Mayers [REDACTED]
Hibray, Jean K	11/11/2021	\$370.00	0.5	185	Send clients [REDACTED]. Email with J Hashmall re same.
Hashmall, Joseph C	11/12/2021	\$550.00	0.2	110	Email exchange with client Jones [REDACTED]
Hashmall, Joseph C	11/12/2021	\$550.00	2.5	1375	Review of and edits to draft preliminary approval brief, internal emails regarding same
Hibray, Jean K	11/12/2021	\$370.00	1.5	555	Finish draft of prelim approval memo, research caselaw to supplement.
Hashmall, Joseph C	11/15/2021	\$550.00	0.2	110	Internal email re plan for case coverage during paternity leave
Hashmall, Joseph C	11/15/2021	\$550.00	0.8	440	Email exchange with opposing counsel regarding settlement signatures, CAFA notice, brief in support of preliminary approval
Hibray, Jean K	11/15/2021	\$370.00	0.3	111	Emails re updates to admin proposal.
Hashmall, Joseph C	11/16/2021	\$550.00	0.3	165	Internal emails regarding motion for preliminary approval
Hashmall, Joseph C	11/18/2021	\$550.00	0.1	55	Internal email regarding draft preliminary approval brief attached
Hashmall, Joseph C	11/22/2021	\$550.00	0.2	110	Email to client [REDACTED]
Hibray, Jean K	11/22/2021	\$370.00	0.1	37	Email re status of exhibits
Hibray, Jean K	11/22/2021	\$370.00	0.2	74	Review returned address notice, email J Hashmall re same
Hashmall, Joseph C	11/23/2021	\$550.00	2.2	1210	Edits to draft preliminary approval brief, internal emails regarding same
Hashmall, Joseph C	11/23/2021	\$550.00	0.1	55	Email to opposing counsel regarding preliminary approval papers
Hashmall, Joseph C	11/24/2021	\$550.00	1.1	605	Final pre-filing review of preliminary approval papers, internal email regarding filing of same
Hibray, Jean K	11/24/2021	\$370.00	1	370	Proof memo in support of prelim approval. Finalize agreement exhibits. Draft motion.
Hibray, Jean K	11/24/2021	\$370.00	0.5	185	Finalize and file motion for prelim approval and supporting papers.
Hibray, Jean K	11/24/2021	\$370.00	0.3	111	Docket file-stamped versions of prelim approval motion and email Admin re same
Drake, E. Michelle	11/29/2021	\$820.00	0.1	82	Call with J Hashmall re case
Hashmall, Joseph C	11/29/2021	\$550.00	0.1	55	Call with Michelle Drake regarding next steps in case
Drake, E. Michelle	12/2/2021	\$820.00	0.1	82	Case meeting
Drake, E. Michelle	12/2/2021	\$820.00	0.1	82	team meeting to discuss case status, deadlines, and next steps in litigation
Hashmall, Joseph C	12/2/2021	\$550.00	0.1	55	Litigation team meeting
Hashmall, Joseph C	12/7/2021	\$550.00	0.4	220	Review of email from court regarding upcoming schedule, email to cocounsel regarding same
Hashmall, Joseph C	12/8/2021	\$550.00	0.2	110	Review Court's order on preliminary approval, email to settlement administrator attaching same
Gionnette, Julie	12/8/2021	\$220.00	0.2	44	download and review order preliminarily approving settlement; calendar hearing date
Hashmall, Joseph C	12/9/2021	\$550.00	0.8	440	Review of settlement timeline, emails to opposing counsel, administrator and internal emails regarding timeline, settlement website and settlement logistics
Hibray, Jean K	12/9/2021	\$370.00	0.6	222	Review admin timeline, email with J Hashmall re same. Updates to calendar accordingly
Hashmall, Joseph C	12/10/2021	\$550.00	0.3	165	Review of settlement schedule, internal email exchange regarding drafting of fee petition
Hashmall, Joseph C	12/13/2021	\$550.00	0.4	220	Review and approval of administrator's draft settlement notices and settlement website
Gionnette, Julie	12/13/2021	\$220.00	0.1	22	download and review order preliminarily approving settlement
Hibray, Jean K	12/15/2021	\$370.00	0.2	74	Pull [REDACTED] reports.
Hibray, Jean K	12/21/2021	\$370.00	1.1	407	Review [REDACTED].
Hibray, Jean K	12/22/2021	\$370.00	0.9	333	Input line edits in Juris.
Hibray, Jean K	12/22/2021	\$370.00	2	740	Conduct caselaw research for fee petition
Hibray, Jean K	12/23/2021	\$370.00	2	740	Caselaw research for fee petition
Hibray, Jean K	12/27/2021	\$370.00	3	1110	Begin draft of fee petition.
Hibray, Jean K	12/28/2021	\$370.00	5.2	1924	Draft/additional research for, fee petition.
Hibray, Jean K	12/28/2021	\$370.00	0.1	37	Email co counsel re [REDACTED]
Hibray, Jean K	1/6/2022	\$370.00	3.5	1295	Finish draft of mtn for fees, cite check, proof and send to attorney

Exhibit B

Expenses_Entry_Date	Expenses_Amount	Expenses_Narrative	expdesc	venname
9/4/2019	\$0.50	PACER - AUG. 2019	Computer Research	
9/4/2019	\$1.00	PACER - AUG. 2019	Computer Research	
9/4/2019	\$5.30	PACER - AUG. 2019	Computer Research	
9/6/2019	\$269.90	WEST - AUG. 2019	Computer Research	
12/3/2019	\$3.80	PACER - NOV. 2019	Computer Research	
12/3/2019	\$203.66	WEST - NOV. 2019	Computer Research	
12/6/2019	\$2.75	Printing	Reproduction costs Print	
12/6/2019	\$5.00	Printing	Reproduction costs Print	
12/6/2019	\$1.50	Printing	Reproduction costs Print	
1/3/2020	\$165.78	WEST - DEC. 2019	Computer Research	
1/3/2020	\$102.79	WEST - DEC. 2019	Computer Research	
1/17/2020	\$106.30	MICHELLE DRAKE; 1162020;	Filing & Misc. Fees	MICHELLE DRAKE*
1/21/2020	\$0.20	PRINTING - JAN. 2020	Reproduction costs Scans	
1/21/2020	\$0.25	PRINTING - JAN. 2020	Reproduction costs Print	
1/21/2020	\$0.25	PRINTING - JAN. 2020	Reproduction costs Print	
1/21/2020	\$0.25	PRINTING - JAN. 2020	Reproduction costs Print	
1/31/2020	\$1.25	Printing	Reproduction costs Print	
2/3/2020	\$1.00	Scanning	Reproduction costs Scans	
2/6/2020	\$1.30	PACER - JAN. 2020	Computer Research	
2/7/2020	\$37.72	WEST - JAN. 2020	Computer Research	
2/14/2020	\$6.66	LOOP-UP - JAN. 2020	Telephone	
2/19/2020	\$0.20	Scanning	Reproduction costs Scans	
2/19/2020	\$7.70	PACER - DEC. 2019	Computer Research	
2/19/2020	\$0.20	Scanning	Reproduction costs Scans	
2/21/2020	\$1.00	MN POSTAGE - 12/31/19 - 02/24/20	Postage	
3/3/2020	\$5.51	WEST - FEB. 2020	Computer Research	
3/10/2020	\$3.50	Printing	Reproduction costs Print	
4/30/2020	\$77.53	WEST - MARCH 2020	Computer Research	
5/6/2020	\$2.30	PACER - APRIL 2020	Computer Research	
5/27/2020	\$7.44	DOCUSIGN - APRIL 03, 2020 to MAY 06, 2020	DocuSign	
6/3/2020	\$19.71	WEST - MAY 2020	Computer Research	
6/30/2020	\$25.00	Minnesota Petty Cash; 104; Certificate of Good Standing for Pro Hac	Filing & Misc. Fees	Minnesota Petty Cash
6/30/2020	\$42.83	Computer Research	Computer Research	
9/15/2020	\$5.36	August Westlaw	Computer Research	
9/15/2020	\$23.11	August Westlaw	Computer Research	
10/8/2020	\$12.27	Westlaw Charges, September 2020	Computer Research	
11/4/2020	\$17.34	Westlaw October 2020	Computer Research	
11/12/2020	\$12.95	LoopUp October 2020	Telephone	
11/12/2020	\$7.44	DocuSign October 6th to November 2nd 2020	DocuSign	
11/24/2020	\$0.48	Monthly Relativity Data Hosting and Maintenance	Ricoh - Data Hosting & Maint	
12/2/2020	\$1.81	Ricoh November 2020 *Monthly Relativity Data Hosting and Maintenance	Ricoh - Data Hosting & Maint	
1/13/2021	\$1.82	Ricoh December 2020 Monthly Relativity Data Hosting and Maintenance	Ricoh - Data Hosting & Maint	
1/21/2021	\$11.55	Westlaw Charges, December 2020	Computer Research	
2/15/2021	\$1.60	January Ricoh Monthly Relativity Data Hosting and Maintenance	Ricoh - Data Hosting & Maint	
2/22/2021	\$64.83	Westlaw January Bill	Computer Research	
3/3/2021	\$1.53	February 2021 Ricoh Monthly Relativity Data Hosting and Maintenance	Ricoh - Data Hosting & Maint	
3/3/2021	\$48.04	February 2021 Westlaw Charges	Computer Research	
3/4/2021	\$8.90	Pacer February 2021 Charges	Computer Research	
4/7/2021	\$1.69	March 2021 Ricoh Monthly Relativity Data Hosting and Maintenance	Ricoh - Data Hosting & Maint	
4/7/2021	\$10.01	Westlaw March 2021	Computer Research	
4/19/2021	\$1.16	March 2021 LoopUp Charges	Telephone	
5/5/2021	\$0.80	April 2021 Westlaw	Computer Research	
5/5/2021	\$20.73	April 2021 Westlaw	Computer Research	
5/11/2021	\$24.79	Invoice Number 7-361-49514; Sent 5/05/2021	Delivery & freight	
5/17/2021	\$2.59	April 2021 LoopUp	Telephone	
5/19/2021	\$1.70	RICOH USA, Inc.*; EDD21040420; Ricoh bill for April 2021.	Ricoh - Data Hosting & Maint	RICOH USA, Inc.*
6/15/2021	\$9.87	May 2021 Westlaw	Computer Research	
6/18/2021	\$650.00	LEXITAS*; 1156783; deposition transcript of Woody Turner	Transcripts	LEXITAS*
6/18/2021	\$573.00	VERITEXT*; 5024538; plaintiff depo transcript	Transcripts	VERITEXT*
6/24/2021	\$2.25	Ricoh USA, Inc. 36338814 *; EDD21050434; 2021 Hosting Charges.	Ricoh - Data Hosting & Maint	Ricoh USA, Inc. 36338814 *
6/25/2021	\$26.58	FedEx sent 5/3/2021; Invoice Number 7-369-79376	Delivery & freight	
7/8/2021	\$12.07	June 2021 Westlaw	Computer Research	
7/21/2021	\$2.16	Ricoh USA, Inc. 36338814 *; EDD21060425; June 2021 Hosting Charges.	Ricoh - Data Hosting & Maint	Ricoh USA, Inc. 36338814 *
7/27/2021	\$26.58	FedEx Invoice Number 7-369-79376; Sent 5/03/2021 MN	Delivery & freight	
8/11/2021	\$3.90	July 2021 Pacer	Computer Research	
8/26/2021	\$2.32	Ricoh USA, Inc. 36338814 *; EDD21070408; July 2021 Hosting Charges.	Ricoh - Data Hosting & Maint	Ricoh USA, Inc. 36338814 *
9/9/2021	\$31.43	July 2021 Westlaw	Computer Research	
9/14/2021	\$2.25	Ricoh USA, Inc. 36338814 *; EDD21080381; August 2021 Hosting Charges.	Ricoh - Data Hosting & Maint	Ricoh USA, Inc. 36338814 *
9/14/2021	\$4.96	DocuSign - 8/21-9/1/21.	DocuSign	
10/25/2021	\$2.38	Ricoh USA, Inc. 36338814 *; EDD21090393; 2021 Hosting Charges - September 2021.	Ricoh - Data Hosting & Maint	Ricoh USA, Inc. 36338814 *
11/11/2021	\$51.30	Westlaw October 2021	Computer Research	
12/1/2021	\$2.15	Ricoh USA, Inc. 36338814 *; EDD21100336; October 2021 Hosting Charges.	Ricoh - Data Hosting & Maint	Ricoh USA, Inc. 36338814 *
12/15/2021	\$9.50	Printing	Reproduction costs Print	
12/16/2021	\$2.21	Ricoh USA, Inc. 36338814 *; EDD21110397; November 2021 Hosting Charges.	Ricoh - Data Hosting & Maint	Ricoh USA, Inc. 36338814 *

Total \$2,807.49

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:

Jeremiah F. Jones
Teri Denice Mayers

Debtors.

Case Nos. (respectively)

18-06304-dd, Chapter 7
14-00864-dd, Chapter 7

Jeremiah Jones and Teri Denice Mayers,
individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

Lexington Health Services District, Inc.
d/b/a Lexington Medical Center,

Defendant.

Adv. Pro. No. 20-80002-dd

**DECLARATION OF DAVID A.
MAXFIELD**

I, David A. Maxfield, hereby declare as follows:

1. I am one of Class Counsel in the above-captioned matter. I submit this Declaration in support of Plaintiffs' Motion for Attorneys' Fees, Costs, and Named Plaintiff Service Awards.
2. My firm has expended 46.28 hours on this matter, resulting in \$22,540.50 in lodestar. Additionally, my firm has incurred \$850 in out-of-pocket costs to date. The line item entries for my firm's fees and costs, redacted for privilege, are attached hereto as **Exhibit 1**.
3. A chart of my firm's timekeepers on this matter, with positions, attorney years of experience and hourly rates is as follows:

Timekeeper	Position	Attorney Yrs. of Experience	Hourly Rate	Hours Worked	Lodestar
David Maxfield	Attorney	27	\$525	36.3	\$19,057.50
Kristy Woodward	Paralegal		\$350	9.88	\$3,458.00
Janel Streater	Paralegal		\$250	0.1	\$25.00
				46.28	\$22,540.50

The foregoing statement is made under penalty of perjury and is true and correct to the best of my knowledge and belief.

Date: January 21, 2022

s/ Dave Maxfield
David A. Maxfield

Exhibit 1



Dave Maxfield, Attorney, LLC
 8035096800 Columbia, South Carolina 29201

808D Lady Street
 United States

[REDACTED]

Amount Due
 \$23,390.50
 Matter
 Mayers, Teri et. al. v. LMC
 Invoice Number
 00001
 Date of Issue
 01/01/2000
 Due Date
 02/10/2022

Time Entries

Date	Description	Hourly Rate	Qty	Discount	Line Total
10/31/2019	Review documents, Agreements and Set up file, TC [REDACTED], corresp.w/ D Stone, J Albanese and [REDACTED]. Review and Execute Retainers, etc.	\$525.00	3.4		\$1,785.00
11/12/2019	Corresp. w/Co-Counsel re next steps	\$525.00	0.2		\$105.00
12/09/2019	Fact gathering for complaint re [REDACTED]; corresp.w/ client. Revise class complaint. Review billing statements and other documents.	\$525.00	2.3		\$1,207.50
01/03/2020	Withdraw Motions to Re-open BR cases.	\$350.00	0.9		\$315.00
01/06/2020	File Adversary Proceeding	\$350.00	1.2		\$420.00
01/08/2020	Revise Complaint; corresp. w/ counsel, Court	\$525.00	2.75		\$1,443.75
01/09/2020	Further complaint revisions	\$525.00	0.4		\$210.00
01/10/2020	File Adversary Proceeding	\$350.00	1.1		\$385.00
02/04/2020	File E. Michelle Drake Motion PHV	\$350.00	0.2		\$70.00
02/17/2020	TC M Patterson: [REDACTED]	\$525.00	0.4		\$210.00
	[REDACTED]	\$525.00	0.8		\$420.00
03/04/2020	Review MTD	\$350.00	0.3		\$105.00
03/06/2020	Docket Hearing	\$525.00	3.4		\$1,785.00
03/31/2020	Legal Research, revision, re: [REDACTED]	\$525.00	1.1		\$577.50
04/15/2020	Corresp. w/ Court, Co-Counsel, OC RE Hearing (multiple)	\$525.00	1.75		\$918.75
06/04/2020	US Bankruptcy Court- Hearing LMC's MTD	\$525.00	0.8		\$420.00
06/04/2020	Review Order Denying MTD	\$525.00	0.5		\$262.50
07/22/2020	Review Answer	\$525.00	0.5		\$262.50
07/23/2020	Review LMC Answer, 26a1s	\$525.00	1		\$525.00
08/06/2020	Counsel Prep/Attend Conf. Call w/Co-and Op.				

08/14/2020	Docket Sched. Order	\$350.00	0.4	\$140.00
08/17/2020	Rev. 26a1 Disclosures	\$525.00	0.5	\$262.50
09/16/2020	TC w/ OC RE Confidentiality Order	\$525.00	0.4	\$210.00
09/29/2020	Review Doc. Production	\$525.00	0.6	\$315.00
10/15/2020	Meet and Confer; draft INT Responses; organize docs.	\$525.00	3.7	\$1,942.50
10/15/2020	Corresp. and Phone Int. w/Clients [REDACTED]	\$350.00	5.5	\$1,925.00
10/15/2020	Meet and Confer Call	\$525.00	0.8	\$420.00
10/22/2020	Revise [REDACTED] research.	\$525.00	1.1	\$577.50
11/03/2020	Review [REDACTED] docs [REDACTED]	\$525.00	0.4	\$210.00
12/31/2020	Corresp. w Joe re [REDACTED]	\$525.00	0.3	\$157.50
01/20/2021	Entered in Amended Order	\$250.00	0.1	\$25.00
02/19/2021	Review LMC 3rd Sup. Disc. Resp.	\$525.00	0.5	\$262.50
03/04/2021	Review Draft [REDACTED]	\$525.00	0.4	\$210.00
04/30/2021	Attend Depos, LMC, Mayers, Jones (2 days)	\$525.00	7	\$3,675.00
08/10/2021	Draft Declaration	\$525.00	1.3	\$682.50
01/11/2022	Billing Statement	\$350.00	0.28	\$98.00

Expense Entries

Date	Description	Rate	Qty	Discount	Line Total
01/10/2020	USBK Filing Fee	\$350.00	1		\$350.00
02/03/2020	USBK - Pro Hac Filing Fee (J. Hashmall)	\$250.00	1		\$250.00
02/04/2020	USBK - PHV Filing Fee (E. Drake)	\$250.00	1		\$250.00
				Subtotal	\$23,390.50
				Total	\$23,390.50
				Amount Paid	\$0.00
				Amount Due	\$23,390.50

Outstanding Invoices

Number	Due Date	Amount	Payments	Balance
00001 (current)	02/10/2022	\$23,390.50	\$0.00	\$23,390.50
			Total Outstanding Balance	\$23,390.50