

Description of Attorney Time

Date	Time keeper	RATE	Task / Activity Code & Description	TIME	AMOUNT
06/08/20	DAS	\$550.00	Telephone intake. Go over additional facts of case, etc. Discuss differences between class actions and individual cases, risks of litigation, how classes are litigated, settlement comparisons between class cases and individual, etc. Discuss experience and probable arguments in a class action as contemplated here. Attorney Brown in on the calls.	0.80	\$440.00
06/08/20	SJB	\$450.00	Intake Canan Schumann, Amazon .8; draft email .1	0.90	\$405.00
06/12/20	SJB	\$450.00	Review client documents and email. Canan Schumann	1.00	\$450.00
06/16/20	DAS	\$550.00	Review documents from client. (.2) Create spreadsheet to calculate missing wages and compare to check stub, etc. (.5) Conference with attorney Brown regarding the same. Discuss what we learned from the 1.5 weeks of information, and what we need to know. Discussed questions to talk to client about. (.4)	0.90	\$495.00
06/16/20	SJB	\$450.00	Review documents Schumann (.1), calculate time worked vs. Time paid (2), email with client regarding earnings statement (.2), and discuss with attorney Schuck,(.4)	0.90	\$405.00
06/16/20	SJB	\$450.00	Phone call with client, Canan Schumann..3; Email with client on time records .5	0.80	\$360.00
06/19/20	SJB	\$450.00	Review additional documents from client	0.50	\$225.00
06/23/20	DAS	\$550.00	Attorney Brown noted a discrepancy between pay and hours documents provided by client. Went through the spreadsheet created to track these items. Modified the spreadsheet significantly so that it was easier to understand and track the new payroll anomaly.	1.40	\$770.00
06/23/20	SJB	\$450.00	Analyzed pay records and timesheets .3; worked with attorney Schuck on editing spreadsheet and calculating wages due 1.4	1.70	\$765.00
06/23/20	SJB	\$450.00	Email with client on time records	0.50	\$225.00
06/24/20	DAS	\$550.00	Update spreadsheet with new documents, double check that the calculations are coming out correct.	0.20	\$110.00
06/24/20	SJB	\$450.00	Review additional client time records and update spreadsheet	0.80	\$360.00
06/25/20	SJB	\$450.00	Review additional documents produced by client	0.40	\$180.00
06/25/20	SJB	\$450.00	Review additional documents from client	0.50	\$225.00
06/25/20	SJB	\$450.00	Review additional documents from client .5; email with client regarding the documents .5	1.00	\$450.00
06/26/20	DAS	\$550.00	Conference with attorneys Brown and Moore regarding strategy, multiple ways the case can be brought while Plaintiff is employed, etc. (.3) Telephone call with client. Discuss spreadsheet, results of spreadsheet, where confusion exists regarding how time is calculated by Defendant, etc. Also discuss class action, a little about the fee agreement, what it means to be a class representative, depositions, and where the law from class actions comes from (ORCP 32). Discuss options for Plaintiff regarding the same and what to provide over the next few weeks. (1.1)	1.40	\$770.00
06/26/20	SJB	\$450.00	Conference with attorneys Moore and Schuck (.3) Telephone call with client and attorney Schuck (.5)	0.80	\$360.00

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Date	Time keeper	RATE	Task / Activity Code & Description	TIME	AMOUNT
06/26/20	SJB	\$450.00	Conference with attorneys Brown and Schuck regarding potential claims	0.50	\$225.00
07/02/20	SJB	\$450.00	Review additional documents from client	0.50	\$225.00
07/03/20	DAS	\$550.00	Work more on spreadsheet of time and unpaid hours.	0.30	\$165.00
07/09/20	SJB	\$450.00	Review documents, canan Schuman .2; research cases on Amazon time clocks. 2.2	2.40	\$1,080.00
07/14/20	SJB	\$450.00	Email with client regarding claims	0.30	\$135.00
07/15/20	SJB	\$450.00	Review Canan Schuman's recent documents.	0.50	\$225.00
07/23/20	DAS	\$550.00	Additional work on spreadsheet with new data to prepare for call with client. (.3) Telephone call with client. Attorney Brown in on the call. Discuss findings from spread sheeting regarding affect on his wages, and discuss moving the case forward to filing. (.4)	0.70	\$385.00
07/23/20	SJB	\$450.00	Discuss Schuman Amazon case with attorney Schuck.	0.50	\$225.00
07/23/20	SJB	\$450.00	Telephone call with Canan Schumann and attorney Schuck .3; draft fee agreements .6	0.90	\$405.00
07/23/20	SJB	\$450.00	Review additional document from client	0.50	\$225.00
07/24/20	DAS	\$550.00	Email to client regarding fee agreement and scheduling if additional call was needed for explanations. (.1) Review email with questions regarding the fee agreement and how it operates. (.1) Draft responsive email answer detailed specific questions regarding operation of fee agreement, court costs, etc. (.8)	1.00	\$550.00
07/27/20	DAS	\$550.00	Schumann - conference with attorneys Moore and Brown to discuss getting case started, information needed from client, necessary notices and assigning tasks (.2) Begin drafting ORCP 32 H notice. (.9)	1.10	\$605.00
07/27/20	KAM	\$450.00	conference with attorneys Schuck and Brown to discuss getting case started, information needed from client, necessary notices and assigning tasks	0.20	\$90.00
07/27/20	SJB	\$450.00	conference with attorneys Schuck and Moore to discuss getting case started, information needed from client, necessary notices and assigning tasks	0.20	\$90.00
08/05/20	SJB	\$450.00	Edit 32H Letter	0.80	\$360.00
08/10/20	SJB	\$450.00	Edit 32H Letter	0.50	\$225.00
08/10/20	SJB	\$450.00	Review documents produced by client	0.40	\$180.00
08/11/20	SJB	\$450.00	Draft conflicts letters	0.60	\$270.00
08/17/20	SJB	\$450.00	Email with client .4; review new document .4	0.80	\$360.00
08/28/20	DAS	\$550.00	Review documents and letter sent from defense counsel. (.5) Review case law cited by opposing counsel regarding first to file. (.7) Telephone call with attorney Egan for Plaintiff on the case that Defendant asserts relates to us to determine the scope of the case he filed and the claims. (.4)	1.60	\$880.00
08/28/20	SJB	\$450.00	Read Amazon's letter and supporting documents 1.2; discuss with attorneys Schuck and Moore .5	1.70	\$765.00
08/28/20	SJB	\$450.00	Email with client regarding status of case	0.20	\$90.00
09/03/20	DAS	\$550.00	Draft initial complaint.	3.70	\$2,035.00
09/03/20	SJB	\$450.00	Review docs in case, email with client regarding missing documents	0.40	\$180.00

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09/04/20	DAS	\$550.00	Edit and revise the class action complaint.	2.50	\$1,375.00
09/04/20	SJB	\$450.00	Edit and draft complaint	3.80	\$1,710.00
09/04/20	SJB	\$450.00	Email with client on facts for the complaint	0.40	\$180.00
09/21/20	SJB	\$450.00	Draft individual demand letter	1.50	\$675.00
09/28/20	SJB	\$450.00	Edit individual demand letter	0.80	\$360.00
09/30/20	SJB	\$450.00	Email with client regarding case	0.30	\$135.00
10/01/20	SJB	\$450.00	Discuss email to Amazon regarding their letter and review email regarding accepting serve of individual demand letter	0.20	\$90.00
10/01/20	SJB	\$450.00	Edit individual demand letter and send to client for approval.	0.30	\$135.00
10/12/20	DAS	\$550.00	Emails with attorney Egan about Amazon cases. Discuss cross over issues and provide propose complaint. (.5) Review response email. (.1)	0.60	\$330.00
10/12/20	SJB	\$450.00	Edit complaint and review for filing.	1.50	\$675.00
10/12/20	SJB	\$450.00	Draft summons for Amazon companies	0.90	\$405.00
11/01/20	DAS	\$550.00	Review email from attorney Egan regarding cross over between the two cases and making clarifications.	0.20	\$110.00
11/02/20	DAS	\$550.00	Respond to email from attorney Egan regarding separation of cases. Discuss expert fees, etc.	0.20	\$110.00
11/02/20	SJB	\$450.00	Read email from J. Egan	0.20	\$90.00
11/08/20	DAS	\$550.00	Review email from attorney Egan.	0.20	\$110.00
11/09/20	DAS	\$550.00	Draft detailed email to attorney Egan regarding our use of experts on class certification and how we use them successfully in federal court. Discuss case law regarding calculation issues.	0.80	\$440.00
11/09/20	SJB	\$450.00	Edit email to sent to J. Egan regarding both class actions against Amazon	0.40	\$180.00
11/11/20	DAS	\$550.00	Review email from attorney Egan regarding expert usage, etc.	0.20	\$110.00
11/12/20	DAS	\$550.00	Telephone call with attorney Egan regarding case crossover.	0.60	\$330.00
11/12/20	SJB	\$450.00	Review Amazon's filings for pro hac vice	0.30	\$135.00
11/13/20	SJB	\$450.00	Read Defendant's Corporate Disclosure Statement	0.20	\$90.00
11/16/20	KAM	\$450.00	Drafting multiple client conflict letter	0.50	\$225.00
11/19/20	DAS	\$550.00	Draft motion to enlarge time to respond.	0.30	\$165.00
11/20/20	SJB	\$450.00	Read def's motion to dismiss and/or stay and begin research on first and file rule and motion to stay.	5.90	\$2,655.00
11/24/20	DAS	\$550.00	Begin review of cases regarding first to file rule. (1.8) Discuss Def's motion to stay with attorney Brown (.5)	2.30	\$1,265.00
11/24/20	SJB	\$450.00	Discuss def's motion to dismiss/stay with attorney Schuck .5; research on first and file rule, comity 5.6	6.10	\$2,745.00
11/25/20	KAM	\$450.00	Discussion with attorneys Schuck and Brown regarding multiple client conflict letters and why those are necessary when we represent multiple clients against the same defendant even in separate cases.	0.20	\$90.00
11/25/20	SJB	\$450.00	Discussion with attorneys Moore and Schuck regarding multiple client conflict letters and why those are necessary when we represent multiple clients against the same defendant even in separate cases.	0.20	\$90.00

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11/25/20	DAS	\$550.00	Discussion with attorneys Moore and Brown regarding multiple client conflict letters and why those are necessary when we represent multiple clients against the same defendant even in separate cases.	0.20	\$110.00
11/25/20	SJB	\$450.00	Telephone call with client re: status of case	0.30	\$135.00
11/25/20	SJB	\$450.00	Research on first to file rule, comity, policy behind first to file rule	6.80	\$3,060.00
11/25/20	SJB	\$450.00	Email client	0.20	\$90.00
12/02/20	SJB	\$450.00	Research first to file rule and begin drafting response to motion to dismiss	3.80	\$1,710.00
12/08/20	DAS	\$550.00	Begin drafting section regarding interpretation of ORS 652.150 and how it is applied to class member claims. (3.5)	3.50	\$1,925.00
12/08/20	SJB	\$450.00	Email defense counsel with a list of Westlaw cases to request	0.20	\$90.00
12/09/20	DAS	\$550.00	Read three cases cited by Defendant in its response. (.9) Continue work in drafting section regarding similarity of parties. (4.5)	5.40	\$2,970.00
12/09/20	SJB	\$450.00	Read def's cases, research and draft response to def's motion to dismiss	7.30	\$3,285.00
12/10/20	DAS	\$550.00	Continue work on drafting section regarding similarity of parties.	4.50	\$2,475.00
12/10/20	SJB	\$450.00	Research for cases on first file rule application when cases are before same judge 3.8; discuss arguments with attorney Schuck 1.0; draft response to motion to dismiss. 3.0	7.80	\$3,510.00
12/11/20	DAS	\$550.00	Work on draft of first to file rule second element argument.	5.50	\$3,025.00
12/11/20	SJB	\$450.00	Draft response to motion to dismiss and stay.	7.30	\$3,285.00
12/12/20	DAS	\$550.00	Read cases regarding stay, elements, etc. (1.9)	1.90	\$1,045.00
12/13/20	DAS	\$550.00	Conference with attorney Brown regarding the stay. Discuss response to that portion of Defendant's motion and how we want to attack. (.5) Work on section for stay regarding harm to Defendant and that they cannot use just the fact that they have to defend to avoid litigation. (2.1)	2.60	\$1,430.00
12/13/20	SJB	\$450.00	Draft response to motion to stay, including case law research (5.2) discussion with attorney Schuck re: stay (.5)	5.70	\$2,565.00
12/14/20	DAS	\$550.00	Review, edit, and revise response brief on Defendant's motion to dismiss/stay. (1.9) Final review/edit of the brief. (1.2)	3.10	\$1,705.00
12/14/20	KAM	\$450.00	Review and edit response to Motion to Dismiss / Stay	1.70	\$765.00
12/14/20	SJB	\$450.00	Draft response to motion to stay 3.8; edit response brief 2.2	6.00	\$2,700.00
01/14/21	SJB	\$450.00	Read def's reply to motion to dismiss/stay	0.60	\$270.00
01/28/21	SJB	\$450.00	Draft MOET	0.30	\$135.00
02/09/21	SJB	\$450.00	Read def's email on new scheduling dates, discuss with attorney Schuck and respond to email with dates.	0.80	\$360.00
02/09/21	SJB	\$450.00	Begin reading Swearingen documents for class cert	3.80	\$1,710.00
02/15/21	SJB	\$450.00	Review def's motion to establish new case management schedule	0.30	\$135.00

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03/01/21	DAS	\$550.00	Email from attorney Egan	0.20	\$110.00
03/18/21	DAS	\$550.00	Email from attorney Egan regarding mediation possibilities.	0.20	\$110.00
04/08/21	DAS	\$550.00	Email from attorney Brown regarding documents in Swearingen and getting those documents. Discuss status of protective order regarding same. (.1) Email from attorney Moore regarding answers she would like from conference with attorney Egan. (.2) Telephone call with attorney Egan regarding Amazon cases. (.5)	0.80	\$440.00
04/08/21	KAM	\$450.00	Emails with attorneys Schuck and Brown regarding mediation between Egan's case and Amazon.	0.20	\$90.00
05/12/21	DAS	\$550.00	Email from attorney Egan regarding outcome of mediation of companion case. (.2)	0.20	\$110.00
07/19/21	DAS	\$550.00	Review findings and recommendation on Defendants' motion to dismiss. (1.6) Conference with attorney Brown regarding same. (.3)	1.90	\$1,045.00
07/19/21	SJB	\$450.00	Read Court's order on Def's motion to stay	0.30	\$135.00
07/20/21	DAS	\$550.00	Review Findings and recommendations on Swearingen case regarding class certification. (1.5)	1.50	\$825.00
07/22/21	DAS	\$550.00	Email to attorney Egan regarding the Court's order on the motion to dismiss. Discuss our thoughts regarding same and seek input regarding same. (.4)	0.40	\$220.00
07/23/21	DAS	\$550.00	Review responsive email from attorney Egan regarding the Court's order, discovery, working together on MSJ briefing, etc. (.5); Telephone call to attorney Egan, left message. (.2)	0.70	\$385.00
07/26/21	DAS	\$550.00	Email from attorney Egan. (.1) Telephone call with attorney Egan. (.5)	0.60	\$330.00
08/16/21	DAS	\$550.00	Review objections to F & R in Swearingen. (1.7) Email to attorney Egan regarding same. (.2) Review reply. (n/c)	1.90	\$1,045.00
09/13/21	DAS	\$550.00	Update client on case status and ruling in Swearingen with impact on this case.	0.20	\$110.00
11/01/21	DAS	\$550.00	Review order from J. Hernandez adopting F&Rs on the Defendants' motion to dismiss. (.3)	0.30	\$165.00
12/29/21	DAS	\$550.00	Review order in Swearingen adopting F&R's. (.3)	0.30	\$165.00
12/29/21	SJB	\$450.00	Read Courts' orders in Swearingen case	0.50	\$225.00
12/30/21	DAS	\$550.00	Review email from attorney Egan regarding F&R's and review. (.1) Telephone call with attorney Egan regarding appeal. (.5)	0.60	\$330.00
12/31/21	DAS	\$550.00	Telephone call with attorney Egan regarding status update, appeal issues, and other issues regarding his related case against Amazon.	0.40	\$220.00
01/05/22	DAS	\$550.00	Call to client to update. (.2) Go over proposed 23(f) appeal from attorney Egan to make suggestions and comments. (.8)	1.00	\$550.00
01/28/22	DAS	\$550.00	Read Defendants' answer and conditional cross-petition. (.8) review proposed reply. Edit and revise same with suggestions for attorney Egan. (1.4) Review suggestions from attorney Brown. (.3)	2.50	\$1,375.00
01/28/22	SJB	\$450.00	Edit Jon Egan's reply brief to Ninth Circuit and read Amazon's response.	1.10	\$495.00

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02/26/22	DAS	\$550.00	Review email from attorney Egan. (.1) Review acceptance of petition for review. (.1)	0.20	\$110.00
05/09/22	DAS	\$550.00	Review email from attorney Egan regarding appeal on the short meal period claims in Swearingen. (.1) Respond to same providing documents he needs to support that the changing of time that affects meal periods applies against Amazon. (.1) Emails discuss procedures so that he can provide same to 9th Circuit. (.1)	0.30	\$165.00
05/26/22	DAS	\$550.00	Review email from attorney Egan regarding appeal in companion case. (.1) Review, edit, and revise proposed opening brief regarding how the clock changes in this case affect the meal periods. (1.8)	1.90	\$1,045.00
06/02/22	DAS	\$550.00	Provided ruling by the Oregon Court of Appeals regarding the Maza case and how it applies to other cases to use in the companion case appeal. (.1) Review responsive email regarding same. (.1)	0.20	\$110.00
06/10/22	DAS	\$550.00	Skim final opening brief for class regarding short meal periods based upon time changes in companion case. (.3)	0.30	\$165.00
08/15/22	DAS	\$550.00	Go over fee questions from client regarding fee agreement and claims. (.2) Draft multi-page response to questions asked by client regarding risks of litigation, claims, etc. (1.2)	1.40	\$770.00
08/16/22	DAS	\$550.00	Telephone call with Plaintiff. Discuss the information in the email regarding claims, what claims to bring. Informed again what the risks were, what attorney Moore recommends, what I recommend, who she can talk to about claims, attorney fees, etc. (.6)	0.60	\$330.00
09/05/22	DAS	\$550.00	Telephone call with attorney Egan regarding settlement of the companion case. Discuss how he got to the settlement, etc. (.5)	0.50	\$275.00
09/20/22	DAS	\$550.00	Review preliminary approval order in companion case regarding settlement.	0.30	\$165.00
09/21/22	DAS	\$550.00	Review email from opposing and respond regarding settlement discussions.	0.20	\$110.00
09/22/22	DAS	\$550.00	Review email from opposing and respond with acceptance of time to discuss settlement. (.1) Review filings of settlement in Swearingen to prepare for conference with opposing regarding potential for settlement. (1.3) Conference with attorneys Moore and Brown regarding same. (.5)	1.90	\$1,045.00
09/22/22	KAM	\$450.00	Review settlement agreement and exhibits from Swearingen case	1.20	\$540.00
09/22/22	SJB	\$450.00	Review settlement agreement in Swearingen case	2.50	\$1,125.00
09/26/22	DAS	\$550.00	Review email from opposing regarding mediation. (.1) Conference with attorney Brown regarding settlement efforts. (.5) Draft email to opposing in response. (.2) Draft email to client regarding status of the case, appeals, stay, mediation, etc. (.3) Telephone call to client, left message. (.1)	1.20	\$660.00
09/26/22	SJB	\$450.00	Discuss settlement with attorney Schuck.	0.50	\$225.00

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09/27/22	DAS	\$550.00	Email to Mediator Wakeen. Discuss parameters and whether she would agree to act as mediator and what her availability is. (.2)	0.20	\$110.00
09/27/22	SJB	\$450.00	Work with DAS to schedule mediation	0.20	\$90.00
09/29/22	DAS	\$550.00	Review email from opposing counsel and mediator. (.2) Discuss same with attorney brown. (.2)	0.40	\$220.00
09/30/22	DAS	\$550.00	Conference with attorney Brown regarding mediation. (.2) Email to client with proposed dates, discuss actions we are taking to prepare for mediation, and what will be needed from him, etc. (.2) review email from client in response and reply answering questions posed. (.2) Review email from mediator and contact client. (.1)	0.70	\$385.00
09/30/22	SJB	\$450.00	Conference with attorney Schuck regarding mediation.	0.20	\$90.00
10/12/22	DAS	\$550.00	Review email from mediator's assistant. Review response from opposing. Reply to all. (.2) Review documents provided by mediator. (.4)	0.60	\$330.00
10/26/22	DAS	\$550.00	Email to opposing counsel about data needed to assist in negotiation at mediation.	0.20	\$110.00
10/31/22	DAS	\$550.00	Review email from opposing with numbers for calculation of damages for mediation purposes. (.3)	0.30	\$165.00
11/01/22	DAS	\$550.00	Email to opposing regarding mediation. (.2) Review settlement documents filed in companion case to assist in preparation for mediation. (3.5) Review email from attorney Egan regarding specific questions that were raised from the settlement documents in the companion case. (.2)	3.90	\$2,145.00
11/01/22	KAM	\$450.00	Began creating settlement analysis and tracking based on claims, info from Def's counsel and Swearingen settlement	1.70	\$765.00
11/02/22	DAS	\$550.00	Review proposed settlement spreadsheet. (.6) Discussion with attorneys Moore and Brown to suggest changes to the spreadsheet and information needed to help negotiations. (.5) Second conference regarding changes to the spreadsheet and comparison to how the Swearingen case was settled, etc. (.8)	1.90	\$1,045.00
11/02/22	KAM	\$450.00	Continued evaluation of claims and making settlement spreadsheet to work how DAS wants for mediation (2.8) Discussion with DAS and SJB regarding structure of settlement administration on claims made basis (.5) Second conference regarding changes to the spreadsheet and comparison to how the Swearingen case was settled, etc. (.8)	4.10	\$1,845.00
11/02/22	SJB	\$450.00	Conference with DAS and KAM regarding settlement and settlement structure	0.50	\$225.00
11/02/22	SJB	\$450.00	Conference with attorneys Moore and Schuck on settlement spreadsheet and agreement	0.80	\$360.00
11/03/22	DAS	\$550.00	Reviewed evidence in file for drafting of the mediation statement. (.6) Create estimation of time lost. (.5) Work on draft of the mediation statement. (2.8) discussion with attorney Moore regarding mediation statement (.5)	4.40	\$2,420.00

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11/03/22	KAM	\$450.00	Began drafting settlement agreement (5.7) discussion with DAS regarding mediation statement (.5)	6.20	\$2,790.00
11/04/22	KAM	\$450.00	Continue editing proposed settlement agreement. (1.5) Discussion with DAS about his review (.1)	1.60	\$720.00
11/09/22	DAS	\$550.00	Final edit of mediation statement. (.3) Begin draft of email to Client regarding mediation, describing settlement achieved in similar case, etc. (.5) Email instructions regarding mediation statement. (.1) Review email from mediator. (.1)	1.00	\$550.00
11/10/22	DAS	\$550.00	Discussion with attorneys Brown and Moore regarding settlement and mediation. Discuss issues regarding potential agreements, etc. (.3) Telephone call with client regarding mediation. Discuss the status, the other settlement, our discussions with opposing counsel, mediation procedures, his questions about mediation, etc. (.8) Telephone call with attorney Egan regarding his experience with Wakeen mediating the Swearingen v Amazon case. Information regarding players, etc. (.6) Inform regarding participants. (.1)	1.80	\$990.00
11/10/22	KAM	\$450.00	Discussion with DAS and SJB regarding settlement and mediation. Also discussed their upcoming call with client. (.3) Review proposed settlement agreement for any additional edits to finalize first draft without amounts (.5)	0.80	\$360.00
11/10/22	SJB	\$450.00	Conference with DAS and KAM on settlement conference on 11/18	0.30	\$135.00
11/10/22	SJB	\$450.00	Telephone conference with client and DAS regarding mediation.	0.80	\$360.00
11/10/22	SJB	\$450.00	Read Swearingen orders prior to mediation	0.70	\$315.00
11/14/22	DAS	\$550.00	Conference with attorney Moore and Brown regarding Swearingen v Amazon case. Discuss what is known from previous negotiations and things to consider in making strategy regarding settlement.	0.30	\$165.00
11/14/22	SJB	\$450.00	Conference with attorney Moore and Schuck regarding Swearingen v Amazon case. Discuss what is known from previous negotiations and things to consider in making strategy regarding settlement.	0.30	\$135.00
11/14/22	KAM	\$450.00	Conference with DAS and SJB regarding Swearingen v Amazon case. Discuss what is known from previous negotiations and things to consider in making strategy regarding settlement.	0.30	\$135.00
11/15/22	DAS	\$550.00	Go over potential methodologies for settlement at mediation with attorneys Brown and Moore. Develop strategy for mediation, discuss terms to push for settlement, incentives to encourage settlement for Defendant, Memorandum of Understandings, etc. (1.8) Second meeting regarding MOU's with attorneys Moore and Brown. (.3) Review, edit, and revise proposed MOU for mediation. (.7)	2.80	\$1,540.00

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11/15/22	KAM	\$450.00	Go over potential methodologies for settlement at mediation with attorneys Brown and Schuck. Develop strategy for mediation, discuss terms to push for settlement, incentives to encourage settlement for Defendant, Memorandum of Understandings, etc. (1.8) Continued discussion with DAS and SJB regarding MOU terms (.3) Draft MOU. (.8) Draft settlement agreement for a guaranteed payout with minimum amount (2.3)	5.20	\$2,340.00
11/15/22	SJB	\$450.00	Go over potential methodologies for settlement at mediation with attorneys Schuck and Moore. Develop strategy for mediation, discuss terms to push for settlement, incentives to encourage settlement for Defendant, Memorandum of Understandings, etc.	1.80	\$810.00
11/15/22	SJB	\$450.00	Conference with attorneys DAS and KAM on settlement	0.30	\$135.00
11/16/22	DAS	\$550.00	Read and edit proposed settlement agreement. Make final changes, etc. (.9) Read revised MOU and make changes. (.7) Conference with attorney Moore regarding same. Also discuss dispute resolution choices should a settlement be reached and settlement agreement (regarding terms) cannot be finalized. (.6)	2.20	\$1,210.00
11/16/22	KAM	\$450.00	Discussion with DAS regarding proposed settlement agreement and additional changes and MOU	0.60	\$270.00
11/18/22	DAS	\$550.00	Finish preparation for mediation. (3.0) Represent Plaintiff at mediation. (9.5) Closing conference with attorneys Moore and Brown regarding what is left to do. (.2)	12.70	\$6,985.00
11/18/22	KAM	\$450.00	Messages with DAS regarding additional terms needed for MOU to clarify what happens with the \$ in various potential situations. (.1) Update MOU (.2) Message with DAS regarding mediation status and updated provisions in MOU for him to review (.2)	0.50	\$225.00
11/18/22	SJB	\$450.00	Attend mediation with DAS, client and Amazon -- with Terry Wakeen	8.70	\$3,915.00
11/19/22	DAS	\$550.00	Email to client. Go over the mediation. Discuss how it was left. Give more input and understanding about what was going on in the mediation that he may have missed or misunderstood.	0.70	\$385.00
11/22/22	DAS	\$550.00	Review response from Amazon.	0.20	\$110.00
11/23/22	DAS	\$550.00	Review the Defendants' proposed changes to the MOU. (.7) Conference with attorneys Brown and Moore regarding same. Go through each major change, discuss, and strategize whether to accept or counter offer regarding same. (.4) Telephone call to client to go over offer and get approval. Attorney Brown in on call. (.2) Reviewed finalized changes to the MOU to be sent back to opposing. (.4) Conference with attorney Moore with additional suggestions. (.2) Email to opposing with MOU modifications. (.1) Email to mediator. Updated on the final issues that we are coming to loggers head at, and seeking assistance to finalize the deal. (.3)	2.30	\$1,265.00

Description of Attorney Time

Date	Time keeper	RATE	Task / Activity Code & Description	TIME	AMOUNT
11/23/22	KAM	\$450.00	Review edits to MOU (1.2) Conference with attorneys Brown and Moore regarding same. Go through each major change, discuss, and strategize whether to accept or counter offer regarding same. (.4) Continue editing and commenting on MOU based on meeting with DAS and SJB; review deadlines in Swearingen (.7) Discussion with DAS regarding my changes to MOU (.2)	2.50	\$1,125.00
11/23/22	SJB	\$450.00	Review Def's changes to MOU .4; conference with KAM and DAS on MOU changes .4	0.80	\$360.00
11/30/22	KAM	\$450.00	Review revisions to MOU. (.4) Discussion with DAS and SJB regarding MOU edits (.4) Email to Def's counsel to set up time to discuss edits to MOU (.1)	0.90	\$405.00
12/05/22	DAS	\$550.00	Review MOU comments in preparation for telephone discussion with opposing. (.2) Conference with attorney Moore regarding same. (.1) Telephone conference with opposing counsel. (.5)	0.80	\$440.00
12/05/22	KAM	\$450.00	Discussion with DAS regarding MOU (.2) Call with Def's counsel regarding MOU (.5) Finalize MOU leaving the issues to resolve as tracked (.3) Email to Def's counsel with MOU (.1)	1.10	\$495.00
12/07/22	KAM	\$450.00	Discussion with DAS and SJB regarding Buero and how to make sure each case was segregated (.3) continued drafting long form settlement agreement and comparing to MOU for consistency (5.1)	5.40	\$2,430.00
12/07/22	SJB	\$450.00	Review changes to MOU and discuss with attorneys Moore and Schuck.	1.20	\$540.00
12/07/22	DAS	\$550.00	Discussion with attorneys Moore and Brown regarding implications of Buero to this case	0.30	\$165.00
12/07/22	KAM	\$450.00	finalize draft of settlement agreement and email to Def's counsel for their review.	2.80	\$1,260.00
12/20/22	DAS	\$550.00	Telephone call from opposing. (.1) Conference with attorney Moore. (.1) Telephone call with Plaintiff regarding settlement, Buero, etc. (.2)	0.40	\$220.00
12/20/22	KAM	\$450.00	discussion with DAS regarding his call with Def's counsel	0.10	\$45.00
01/12/23	DAS	\$550.00	Emails with opposing counsel regarding potential settlement. (.3)	0.30	\$165.00
01/13/23	DAS	\$550.00	Emails with opposing counsel. (.1) Zoom conversation with opposing regarding settlement. Defendants proposed change in the settlement figures. (.5)	0.60	\$330.00
01/13/23	SJB	\$450.00	Read def's motion filed with court notice of withdrawal	0.20	\$90.00
01/17/23	KAM	\$450.00	Discuss Def's counteroffer with attorneys Schuck and Brown	0.40	\$180.00
01/17/23	DAS	\$550.00	Discuss Def's counteroffer with attorneys Moore and Brown	0.40	\$220.00
01/17/23	SJB	\$450.00	Discuss Def's counteroffer with attorneys Schuck and Moore	0.40	\$180.00
01/20/23	DAS	\$550.00	Conference with attorneys Moore and Brown regarding Defendant's offer. (.5) Telephone call with client. (.3)	0.80	\$440.00
01/20/23	SJB	\$450.00	Discuss def's settlement offer and counter offer with attorneys Schuck and Moore .4; call with client .2	0.60	\$270.00
01/20/23	KAM	\$450.00	Discuss def's settlement offer and counter offer with DAS and SJB	0.40	\$180.00

Description of Attorney Time

Date	Time keeper	RATE	Task / Activity Code & Description	TIME	AMOUNT
01/21/23	DAS	\$550.00	Draft settlement communication to opposing. (.2)	0.20	\$110.00
01/24/23	DAS	\$550.00	Emails with opposing regarding settlement. (.1) Telephone call with opposing. Defendant made counteroffer. (.2)	0.30	\$165.00
01/26/23	DAS	\$550.00	Review settlement MOU from opposing containing revised terms of the settlement. (.5) Conference with attorneys Moore and Brown regarding same. (.3) Telephone call to client. (.1)	0.90	\$495.00
01/26/23	KAM	\$450.00	Review MOU with Defendant's changes (.3) Call with attorney Schuck regarding same (.2) Second call with attorney Schuck, attorney Brown in on call to discuss changes to MOU (.2)	0.70	\$315.00
01/26/23	SJB	\$450.00	Review Amazon's changes to the MOU for settlement	0.80	\$360.00
01/31/23	KAM	\$450.00	finalize draft of notice, claim form, text alert, proposed orders for preliminary approval and final approval (4.7) email docs to Def's counsel for review (.1)	4.80	\$2,160.00
02/15/23	SJB	\$450.00	Read court order in Swearingen case	0.20	\$90.00
02/20/23	SJB	\$450.00	Discuss settlement status with attorney Schuck	0.20	\$90.00
02/20/23	SJB	\$450.00	Discuss settlement status of case with attorney Schuck and review email	0.30	\$135.00
02/20/23	DAS	\$550.00	Discussion with attorney Brown re settlement status	0.20	\$110.00
03/06/23	DAS	\$550.00	Begin review of Defendants' proposed settlement changes. (.7) Conference with attorneys Moore and Brown regarding same. (.4) continued conference with attorney Moore (.1)	1.20	\$660.00
03/06/23	KAM	\$450.00	Began review of edits to settlement documents; email to Defs' counsel for documents with tracked changes working instead of just showing the edits. (1.5) Discussion with attorneys Brown and Schuck regarding my preliminary review of Defs' edits. (.4) continued discussion with just attorney Schuck regarding same (.1)	2.00	\$900.00
03/06/23	SJB	\$450.00	Review settlement documents sent by Amazon (1.5); Discuss changes to settlement agreement and notice with attorneys Schuck and Moore (.4)	1.90	\$855.00
03/06/23	SJB	\$450.00	Review settlement documents in case and review changes Amazon made	2.50	\$1,125.00
03/07/23	DAS	\$550.00	Review order from court.	0.20	\$110.00
03/07/23	KAM	\$450.00	Email with tracked changes on settlement documents. Began detailed review of changes (2.5) email to Def's counsel regarding court lifting stay and proposed joint status report (.1)	2.60	\$1,170.00
03/08/23	DAS	\$550.00	Review joint status report.	0.20	\$110.00
03/08/23	KAM	\$450.00	Draft joint status report and motion to stay to allow attorneys to finalize settlement (.3) continued review of settlement documents and changes from Defs' counsel. Email to DAS and SJB with what I believe are the remaining issues (1.1)	1.40	\$630.00
03/09/23	DAS	\$550.00	Review notice and claim form documents. (.8) Conference with attorneys Moore and Brown regarding settlement notice, orders, etc. (.5) Review settlement document. (1.7)	3.00	\$1,650.00

Description of Attorney Time

Date	Time keeper	RATE	Task / Activity Code & Description	TIME	AMOUNT
03/09/23	KAM	\$450.00	Discussion with attorneys Schuck and Brown regarding Defs' changes to settlement documents. Discussed areas that are concerning and need to address with Defs' counsel	0.50	\$225.00
03/09/23	SJB	\$450.00	Review settlement agreement changes .5 and discuss with attorneys Moore and Schuck..5	1.00	\$450.00
03/10/23	KAM	\$450.00	Discussion with DAS regarding his review of full settlement agreement	0.20	\$90.00
03/10/23	DAS	\$550.00	Discussion with attorney Moore regarding review of full settlement agreement	0.20	\$110.00
03/13/23	DAS	\$550.00	Review proposed changes to the Joint status report.	0.20	\$110.00
03/14/23	KAM	\$450.00	review Def's changes to joint status report. (.2) email to Def's counsel with final copy (.1)	0.30	\$135.00
03/29/23	KAM	\$450.00	Edits to settlement documents (1.5) Emails with Def's counsel regarding settlement documents (.2)	1.70	\$765.00
03/30/23	KAM	\$450.00	Drafting motion for preliminary approval	5.30	\$2,385.00
03/31/23	KAM	\$450.00	Drafting Motion for Preliminary Approval. (4.5) continued drafting motion (.5)	5.00	\$2,250.00
04/02/23	DAS	\$550.00	Review, edit, and revise preliminary settlement motion to approve class settlement. (2.4)	2.40	\$1,320.00
04/03/23	KAM	\$450.00	Review DAS edits to Motion for Preliminary Approval. Email same to Def's counsel for review.	1.20	\$540.00
04/10/23	KAM	\$450.00	Review RPCs relevant to communication and representation of class members. (.5) Discussion with DAS and SJB regarding same in light of RPCs (.5) Call to OSB General Counsel regarding communications with class members in certified class settlement and proposed limitations on communications, Def's counsel input on communications, etc. (.3) Advised DAS and SJB of conversation with OSB (.3) Look up case OSB General Counsel directed me to consider (.3) Drafted email to Def's counsel for DAS and SJB to review and edit. Included case on RPC 4.2 (.7)	2.10	\$945.00
04/10/23	SJB	\$450.00	Review Amazon's changes to settlement agreement .5 and discuss with attorneys Moore and Schuck .3	0.80	\$360.00
04/11/23	DAS	\$550.00	Review, edit, and revise email detailing ethical issues with the final area of the settlement agreement not resolved. (.9) Conference with attorney Moore regarding issues, etc. (.2)	1.10	\$605.00
04/11/23	KAM	\$450.00	Review edits from DAS and SJB on email to Def's counsel regarding RPCs relevant to the settlement (.2) call with DAS regarding same; made additional edits for him to review (.2)	0.40	\$180.00
04/11/23	SJB	\$450.00	Read case from district of Oregon on communication with class members and edit email to Amazon's counsel	0.50	\$225.00
04/12/23	DAS	\$550.00	Review email from opposing and respond. (.2) Conference with attorney Moore regarding settlement terms. (.2) Telephone call with opposing counsel regarding the final terms that we need to agree upon. (.3)	0.70	\$385.00
04/12/23	KAM	\$450.00	Email from Def's counsel regarding communication with class members. (.1) Discuss with DAS (.2)	0.30	\$135.00

Description of Attorney Time

Date	Time keeper	RATE	Task / Activity Code & Description	TIME	AMOUNT
04/12/23	SJB	\$450.00	Phone call with attorney Schuck and Amazon attorney Lauren Blass regarding settlement terms	0.30	\$135.00
04/14/23	KAM	\$450.00	Emails with Def's counsel regarding joint status report	0.20	\$90.00
04/17/23	KAM	\$450.00	Review RPCs (.2) Discuss changes to settlement documents with DAS and SJB (.4) email to Def's counsel with changes to settlement documents (.3)	0.90	\$405.00
04/17/23	SJB	\$450.00	Discuss changes to settlement documents with attorneys Schuck and Moore	0.40	\$180.00
04/17/23	DAS	\$550.00	Discuss changes to settlement documents with attorneys Brown and Moore	0.40	\$220.00
04/20/23	DAS	\$550.00	Review email from opposing regarding notice. (.1) Review notice. Review modifications suggested by opposing. (.3) Conference with attorney Moore and Brown regarding same. (.3) Telephone call to client, left message. (.1) Email to client with instructions. (.3) Telephone call with client regarding settlement. (.2)	1.30	\$715.00
04/20/23	KAM	\$450.00	Email from Def's counsel. Discuss with DAS and SJB (.3) Finalized settlement documents and email to Def's counsel (.8) edits to motion for preliminary approval; draft declaration for me, DAS, and SJB (1.8) Gathering figures for declarations; edits to declarations (1.5) email to DAS and SJB regarding declarations (.1)	4.50	\$2,025.00
04/20/23	SJB	\$450.00	Discussion with attorneys Schuck and Moore re: email from Def's counsel.	0.30	\$135.00
04/21/23	DAS	\$550.00	Review, edit, and revise my declaration. (.7)	0.70	\$385.00
04/21/23	KAM	\$450.00	Finalized declarations. Draft motion for consent to Magistrate. Finalized exhibits to declarations. Reviewed Motion for Preliminary Approval. Emails to Def's counsel with documents for final review.	2.10	\$945.00
04/21/23	SJB	\$450.00	Draft declaration in support of preliminary approval of settlement.	0.90	\$405.00
04/24/23	KAM	\$450.00	Finalized documents for filing. Emails with Def's counsel on final documents. Filed consent, motion for prelim approval, settlement agreement and supporting documents	1.50	\$675.00
04/26/23	DAS	\$550.00	Review order from court.	0.20	\$110.00
04/27/23	KAM	\$450.00	Email to Admin and Def's counsel with settlement docs and timing of final hearing.	0.40	\$180.00
05/11/23	KAM	\$450.00	Email from Def's counsel with class list. Email response asking about CAFA notice (.1) email to Admin re: review of final notice and website (.1) updated deadlines in Amicus (.2)	0.40	\$180.00
05/19/23	KAM	\$450.00	review notice and claim form from Set Admin; respond to email	0.40	\$180.00
06/01/23	KAM	\$450.00	Create class list database to track calls / communications from class members; upload class list (1.5) Begin drafting email to SL regarding class member contacts, Group B claim forms, and responding to class member communications (.3)	1.80	\$810.00

Description of Attorney Time

Date	Time keeper	RATE	Task / Activity Code & Description	TIME	AMOUNT
06/05/23	KAM	\$450.00	Email from admin. Review settlement website. Email to admin with additions to website. (.4) email to Schuck Law advising when mailing, database to track calls and Set Admin's info if Class Members need to update information (.3)	0.70	\$315.00
06/07/23	KAM	\$450.00	Emails with Def's counsel and Admin on how to handle class member questions	0.20	\$90.00
06/12/23	KAM	\$450.00	Emails and calls with class members and potential class members regarding settlement (2.2) Discussion with DAS and SJB regarding calls / emails (.2) Email to Def's counsel regarding inquiries of those that believe they should be a class member and are not in the class list (.2)	2.60	\$1,170.00
06/12/23	DAS	\$550.00	conference with attorneys Brown and Moore regarding class member calls and emails	0.20	\$110.00
06/12/23	SJB	\$450.00	conference with attorneys Schuck and Moore regarding class member calls and emails	0.20	\$90.00
06/13/23	KAM	\$450.00	emails with class members regarding settlement	0.40	\$180.00
06/14/23	DAS	\$550.00	Review information for telephone call with opposing counsel regarding notice/class list, etc. (.6) Telephone call with opposing counsel regarding issues with class, notice, and missing class members from class list, etc. (.3)	0.90	\$495.00
06/14/23	KAM	\$450.00	Emails with Def's counsel to set up call to discuss those wanting to be in class and group b designations (.1) review class member courts in MOU, settlement agreement and class list (.2) discussion with attorney Schuck regarding same (.2) call with Def's counsel regarding class list and designation (.3)	0.80	\$360.00
06/15/23	DAS	\$550.00	Meeting with attorneys Brown and Moore regarding issues in settlement.	0.40	\$220.00
06/15/23	SJB	\$450.00	Meeting with attorneys Schuck and Moore regarding issues in settlement.	0.40	\$180.00
06/15/23	KAM	\$450.00	Calculate potential increase in class claims based on Defendant's misdesignation of Group B and leaving 20% out of Group A. Calculate potential ways of addressing class issues (1.5) Advise EAC on designation issues and to advise any class member that believes their employment ended during the class period to submit a claim form (.1) discussion with DAS and SJB regarding potential options to correct class issues, but will need actual numbers from Def's counsel (.4)	2.00	\$900.00
06/19/23	DAS	\$550.00	Telephone call with class member. He did not have sufficient information to help. Walked him through the process, the multiple cases that have been filed against Amazon and the contact information for the administrator, etc.	0.30	\$165.00
06/19/23	KAM	\$450.00	Respond to class members' emails	0.40	\$180.00
06/20/23	KAM	\$450.00	Email from Def's counsel with additional class count numbers. Analysis of how that factors into settlement. Email to DAS and SJB with options for us to discuss.	0.70	\$315.00

Description of Attorney Time

Date	Time keeper	RATE	Task / Activity Code & Description	TIME	AMOUNT
06/21/23	DAS	\$550.00	Review email from attorney Moore to prepare for conference. (.2) Conference with attorneys Moore and Brown regarding options in the settlement. (.4) Telephone call to client. Discuss situation, options suggested by Schuck Law, and option suggested previously by Defendant. (.2) Review, edit, and discuss proposed addendum to the settlement agreement to address issues being negotiated. (.5) Review, edit, and discuss proposed order regarding the addendum. (.5)	1.80	\$990.00
06/21/23	KAM	\$450.00	Conference with attorneys Brown and Schuck regarding options to handle additional class members (.4) drafting proposed Addendum to Settlement Agreement, revised Notice and proposed order approving addendum (2.2)	2.60	\$1,170.00
06/21/23	SJB	\$450.00	Conference with attorneys Moore and Schuck regarding revising notice and prepare for discussion with Amazon attorneys.	0.40	\$180.00
07/03/23	DAS	\$550.00	Read Defendant's letter regarding case law and how to resolve the current situation regarding the settlement. (.8) Call with attorneys Moore and Brown regarding Defendant's proposed resolution of class designation/definition issues. (.6).	1.40	\$770.00
07/03/23	SJB	\$450.00	Call with attorneys Moore and Schuck regarding Defendant's proposed resolution of class designation/definition issues.	0.60	\$270.00
07/03/23	KAM	\$450.00	Conference call with DAS and SJB regarding Def's proposal regarding class designation and (.6) Review Def's counsel's letter regarding same and email DAS / SJB (.2) Revise settlement addendum and proposed order. Email explaining to SJB / DAS with propose addendum and order (1.5)	2.30	\$1,035.00
07/10/23	DAS	\$550.00	Review edit and revise proposed order. (.4) Review edit and revise proposed settlement agreement addendum. (.7)	1.10	\$605.00
07/10/23	KAM	\$450.00	Review reminder postcard. Email to Admin and Def's counsel regarding same (.3) Email to Def's counsel that will have response to him by Wednesday (.1)	0.40	\$180.00
07/18/23	DAS	\$550.00	Review revised settlement documents provided by Defendants. (1.2) Telephone call with attorney Moore regarding the same. (.2)	1.40	\$770.00
07/21/23	DAS	\$550.00	Telephone call with class member. (.4) Review edits and revisions to addendum. (.5) Conference with attorney Moore regarding same. (.2)	1.10	\$605.00
07/21/23	KAM	\$450.00	Review changes from Def's counsel to addendum; approve / edit addendum. Email response to Def's counsel that we will review.	0.40	\$180.00
07/24/23	DAS	\$550.00	Review, edit, and revise motion for approval regarding the addendum. (.4) Telephone call to client regarding addendum, etc. Discuss questions regarding settlement, etc. (.1)	0.50	\$275.00

Description of Attorney Time

Date	Time keeper	RATE	Task / Activity Code & Description	TIME	AMOUNT
07/24/23	KAM	\$450.00	Review changes to motion for preliminary approval of addendum from Def's counsel and email counsel with final documents.	0.30	\$135.00
07/27/23	KAM	\$450.00	Email from court clerk regarding final approval hearing, responded with availability. (.1) Emails from Def's counsel regarding advising court of addendum; Email response agreeing (.1)	0.20	\$90.00
07/28/23	DAS	\$550.00	Review defendant's proposed edits to the motion to approve addendum.	0.60	\$330.00
07/28/23	KAM	\$450.00	Review edits to addendum from Def's counsel; email final edits (.5) draft motion for attorney fees, costs, admin costs, and service award (2.5)	3.00	\$1,350.00
07/30/23	DAS	\$550.00	Went through attorney fee memorandum. Edited and revised same. (.8)	0.80	\$440.00
07/31/23	KAM	\$450.00	Emails with administrator regarding counts of class members, opt outs, objections, returned mail, etc. (.1) review DAS edits to Motion for attorney fees; incorporate numbers from Admin (1.2) Draft DAS declaration supporting fees, costs, admin expenses, service award (.7) Email from court with signed order. Email to Set Admin with signed Addendum and order (.1)	2.10	\$945.00
08/01/23	KAM	\$450.00	Emails with Def's counsel regarding motion for attorney fees, costs, admin expenses and service award. (.2) Editing Motion per Def's counsel's review and to comply with LR on word count (3.5)	3.7	\$1,665.00
08/01/23	KAM	\$450.00	Finalize Schuck Declaration with exhibits. Download time billed in case for exhibit 1.	1.6	\$720.00

Additional attorney time continues to accrue for administration of settlement and representing class members