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12 *Attorneys for*
LaRonda Robinson
13

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF LOS ANGELES**

16 DANIEL MARKO, and JESUS CORONA, on
17 behalf of themselves and others similarly situated
and in their capacity as Private Attorney General
18 Representatives,

19 Plaintiffs,

20 vs.

21 DOORDASH, INC.,

22 Defendant.
23
24
25
26
27
28

Case No. BC659841

*Assigned for all purposes to the
Honorable Amy D. Hogue*

**DECLARATION OF CALEB MARKER IN
SUPPORT OF MOTION FOR ATTORNEYS'
FEES AND COSTS**

Date: November 30, 2021
Time: 9:30 AM
Department: 7

Date Action Filed: May 2, 2017
Trial Date: TBD

1 I, Caleb Marker, declare and state as follows:

2 1. I am an attorney at law duly licensed to practice law in the state of California. I have been
3 a member in good standing of the State Bar of Michigan since 2007, the District of Columbia Bar since
4 2009, the State Bar of California since 2010, the State Bar of Texas since 2017, and the State Bar of
5 Washington since 2020. I am a partner at the law firm of Zimmerman Reed LLP (“ZR”), and am one of
6 the attorneys representing LaRonda Robinson (“Robinson”) in this action. I submit this declaration in
7 support of Motion for An Award of Attorneys’ Fees and Costs. I have personal knowledge of the
8 statements contained herein and if called as a witness, I could and would testify competently thereto.

9 **A. Adequacy of Representation and Class Action Experience**

10 2. I graduated from Michigan State University in 2004 and Michigan State University’s
11 College of Law in 2007. Prior to joining ZR as a partner in 2015, I practiced in an of counsel basis at
12 the law firm of Ridout Lyon + Ottoson (“RLO”). Prior to joining RLO’s predecessor in 2010, I practiced
13 consumer protection law at the Consumer Law Center in East Lansing, Michigan from 2007 to 2010.

14 3. I am active in a number of legal organizations, including the Los Angeles County Bar
15 Association where I have served on the Litigation Executive Committee and Access to Justice
16 Committee, the goal of which is to maximize the delivery of legal services to the poor and encourage
17 attorneys to provide free legal services to those in need of such services. In addition to LACBA, I am
18 also an active member of Duke Law School’s Center for Judicial Studies and have worked as the lead
19 plaintiff-side contributor on a best practices guide for electronic notice of class action and mass tort
20 settlements, which included contributions from members of the state and federal judiciaries and was
21 published in the Center’s *Judicature* publication. I have been selected by Southern California Super
22 Lawyers Magazine as a Rising Star from 2015 to the present. A more detailed version of my professional
23 background is available online at: <https://www.zimmreed.com/people/caleb-marker/>.

24 4. My entire career as an attorney has focused on employment misclassification and unfair
25 business practices and I have always maintained a *pro bono* practice. My practice has continuously
26 focused on serving as class counsel in a variety of different types of class actions including, but not
27 limited to, those involving wage and hour law violations, consumer fraud, deceptive trade practices, and
28 mortgage and banking law violations.

1 5. For more than a decade, I have been found to be qualified to serve as class counsel by
2 other courts on several occasions. No court has ever determined that I was inadequate to serve as class
3 counsel. During that time, Zimmerman Reed has represented countless workers in numerous cases
4 challenging their misclassification and other related employment claims.

5 6. In 2016, I tried the first merits arbitration against a gig-economy company in *Eisenberg*
6 *v. Uber Technologies, Inc.* under the then-applicable *Borello* standard. I have continued to represent
7 misclassified gig-economy workers against companies such as Uber, Lyft, DoorDash, Postmates, and
8 Grubhub under ever-evolving legal tests governed by *Borello*, *Dynamex*, AB5, and now Proposition 22.

9 7. On November 20, 2020, Judge Daniel Buckley appointed me as a class counsel and
10 certified the contested class action in *Seltzer v. GHP Management, et al.* (LASC 18STCV07828) for
11 litigation purposes. In his order, Judge Buckley noted “The Court further finds class counsel to be
12 experienced, accomplished, competent, and therefore adequate. See Maya Decl. ¶¶ 11-13; Marker Decl.
13 ¶¶ 1-13.” Order dated Nov. 20, 2020.

14 8. In 2017, I was appointed to the plaintiff’s steering committee by U.S. District Judge
15 James Browning in multidistrict litigation captioned *In Re: Santa Fe Natural Tobacco Company*
16 *Marketing and Sales Practices Litigation* (MDL 2695) currently pending in the U.S. District Court for
17 the District of New Mexico in Albuquerque, New Mexico. The Santa Fe MDL was recently the subject
18 of an in-depth article published by Bloomberg Businessweek in an article entitled “Nature’s Cancer
19 Sticks: American Spirits Long, Strange Trip to Court” available at
20 <https://www.bloomberg.com/features/2016-natural-american-spirit-cigarettes/>. Plaintiffs’ motion for
21 class certification, which involved forty hours of expert testimony and oral argument, has been pending
22 in the Santa Fe MDL since December 2020.

23 9. I served as one of the principal attorneys in a consumer class action involving defective
24 recreational vehicle refrigerators that had a propensity to develop leaks and cause fires. Before
25 negotiating a settlement, ZR reviewed more than 166,000 documents, took and defended countless
26 depositions, and retained specialized experts. In 2016, U.S. District Judge Staton granted final approval
27 of a class action settlement in that case where \$36 million was distributed to more than 45,000 consumers
28 who submitted claims. *See, e.g., Etter v. Norcold, Inc.*, No. SACV1300081JLSRNB, Doc. 539 (October

24, 2016) and *Etter v. Thetford Corp.*, No. SACV1300081JLSRNB, 2017 WL 1433312, at *1 (C.D. Cal. Apr. 14, 2017).

10. I served as lead counsel in the case of *Longest v. Green Tree Servicing LLC* in the U.S. District Court for the Central District of California. After moving for class certification, Judge Snyder determined that plaintiff needed expert testimony to confirm that identifying individual class members was administratively feasible. *Longest v. Green Tree Servicing LLC*, 308 F.R.D. 310 (C.D. Cal. 2015). After securing expert testimony and renewing our motion for class certification, we were able to negotiate a \$46 million global settlement against Green Tree Servicing and Assurant with co-counsel in Miami. *See, e.g., Circeo-Loudon v. Green Tree Servicing, LLC*, No. 14-21384-CIV-MORENO, 2014 WL 4219587, at *1 (S.D. Fla. Aug. 25, 2014). Ultimately, we returned 12.5% of all premiums paid by mortgage borrowers (more than 175,000 were notified of the settlement), representing significant relief for homebuyers and close to half the damages incurred by the Class.

11. I led a class action against the City of Los Angeles and Xerox that drew significant media attention, trying the case to verdict in 2014 before Judge Chalfant and obtaining a judgment that now requires the City to end its decades-long outsourcing of the City's parking violations bureau in a case that will help over a hundred thousand motorists in Los Angeles over the next few years. My co-counsel and I later defended the trial court's verdict on appeal, resulting in a unanimous opinion fully affirming the trial court's verdict and fee award and multiplier enhancement under the private attorney general doctrine. *Weiss v. City of Los Angeles*, 2 Cal. App. 5th 194 (Ct. App. 2016), review denied (Nov. 22, 2016).

12. I served as class counsel and the primary plaintiff's attorney in *Michigan Finance Authority v. Kiebler et al.*, a class-action counterclaim alleging that the Michigan Finance Authority, a division of the Michigan Treasury, breached thousands of student loan contracts by terminating a zero percent payment incentive during the financial crisis of 2008. Originally filed as a declaratory relief action in state court, my co-counsel and I successfully represented a class of student loan borrowers against the State's motion for summary adjudication and defended the result on appeal to the Michigan Court of Appeals and Supreme Court. *See Michigan Fin. Auth. v. Kiebler*, 495 Mich. 874, 837 N.W.2d 685 (2013). Ultimately, we secured the first class-action settlement in Michigan's new Court of Claims

(formed during the pendency of the litigation) and obtained final approval of an \$11.5 million settlement benefiting more than 60,000 borrowers.

13. In 2012, my partner, Gordon Rudd, was appointed to the executive committee for *In re FedEx Ground Package System, Inc.*, MDL 1700, 283 F.R.D. 427 (N.D.Ind. 2012). That case involved the representation of FedEx Ground drivers improperly classified as independent contractors in the multi-district litigation proceeding. Due to the executive committee's efforts, drivers were able to negotiate various class settlements exceeding \$400 million.

14. My first appointment as class counsel was by U.S. District Judge Virginia Phillips in the employment misclassification case captioned *Trauth v. Spearmint Rhino Companies Worldwide, Inc.*, No. EDCV091316VAPDTBX, 2011 WL 13134046, at *9 (C.D. Cal. Apr. 4, 2011).

15. The Zimmerman Reed LLP law firm, with offices in Minneapolis, Minnesota, Los Angeles, California, and Scottsdale, Arizona, has extensive experience in the prosecution, trial, and settlement administration of a broad range of class actions and other types of complex litigation. Attached hereto as **Exhibit A** is the firm's leadership resume reflecting its role as lead or liaison counsel in MDLs, steering committee or sub-committee positions in MDLs, and lead counsel in class action lawsuits. I currently work out of the firm's California office.

16. Neither Robinson nor our firm has any conflicts of interest with any Class Members.

17. I respectfully believe that the foregoing facts establish that Zimmerman Reed LLP and I have the requisite experience and qualifications to have contributed meaningfully to this case on behalf of our client and class members and are entitled to a fee award in this case.

B. Zimmerman Reed's Contributions to the Instant Litigation

18. I have been actively involved in this litigation since filing Robinson and ZR's opposition on December 2, 2019 in *Marciano v. DoorDash*. My involvement in this matter has included:

- a. Submitting an opposition to the *Marciano I* Settlement in order to preserve FLSA claims and protect the rights of the putative class;
- b. Serving as a catalyst in creating conditions ripe for an improved settlement through improved negotiation power for Class Counsel;
- c. Actively communicating and engaging with our client; and

d. Attending hearings regarding motions for preliminary approval and motions to intervene with the parties of this case.

19. During the proceedings in *Marciano*, we opposed to the first settlement agreement, and, as explained below, our objections identified several issues with the early iterations of the settlement that led the court there to issue several tentative orders, which in turn led to the substantially improved and beneficial settlement agreement here. By opposing the first settlement agreement, we helped preserve the rights of potentially thousands of FLSA claimants and improve the terms for the putative class. Ultimately, our time and involvement in this case helped create a favorable environment for Class Counsel to negotiate with Defendant as Defendant was facing countless individual arbitrations, including claims from ZR's clients, along with pushback from the court in *Marciano* to create a substantially improved settlement.

20. The current *Marko* Settlement has been refined to fairly and adequately compensate members of the class regarding the claims at issue. Overall, the *Marko* Settlement increased in total value from \$39.5 million to \$100 million (a \$60.5 million increase). It provides service awards of \$10,000 for each named plaintiff, and allocates \$12.5 million for violations of the Private Attorney General Act ("PAGA") (vastly increased from the original allocation of \$750,000 in the *Marciano I* Settlement).

21. To date, ZR has incurred a total of **\$144,596.10** in attorneys' fees and **\$261.45** in costs in Ms. Robinson's involvement in the *Marciano* and *Marko* cases. This effort has been illustrated by opposing the first proposed class settlement, attending every hearing on motions to intervene and motions for preliminary approval in *Marciano* and *Marko*, and speaking with our clients to ensure a fair recovery for her and other couriers.

22. A true and accurate copy of our firm's contemporaneous billable time and expenses is attached hereto as **Exhibit B**.

23. As outlined below, each iteration of the settlement agreement has shown a good-faith attempt to make substantive changes reflective of the court's desires and external pressures.

24. ZR has also represented thousands of DoorDash couriers with claims against Defendant in arbitration. I believe the specter of numerous arbitrations led in part by ZR against DoorDash

propelled Defendant to seek a class settlement and ultimately agree to the improvements present in the *Marko* Settlement.

25. In pursuing arbitration against Defendant, ZR incurred a total of **\$590,535.75** in attorneys' fees and professional time along with **\$6,052.32** in costs.

26. In total, our firm's lodestar for *Marciano*, *Doordash* arbitrations, and *Marko* is **\$735,131.85** in attorneys' fees and **\$6,313.77** in costs.

C. The *Marko* and *Marciano* Settlements

27. The current *Marko* Settlement has a lengthy history that began in 2018. Plaintiffs originally sued Defendant on July 5, 2018, alleging only PAGA violations claiming that DoorDash misclassified them as independent contractors. *See Marciano v. DoorDash*, No. CGC-18-567869 (S.F. Super. Ct. filed July 5, 2018). DoorDash unsuccessfully moved to compel arbitration and then sought appellate review of that order. Pending that appeal, the court granted DoorDash's motion to stay. While the case was stayed, the parties engaged in mediation and ultimately settled the dispute, resulting the first *Marciano* settlement (the "*Marciano I* Settlement"). Zimmerman Reed raised serious legal issues when opposing Plaintiffs' motion for preliminary approval of the *Marciano I* Settlement. Prompted by the concerns Zimmerman Reed raised, the settlement was revised eventually resulting in the *Marko* settlement currently before this Court for final approval.

28. Shannon Liss-Riordan ("Class Counsel") moved for preliminary approval of the *Marciano I* Settlement on November 21, 2019 in San Francisco Superior Court. The first proposed settlement allocated \$39.5 million to the Settlement Fund, \$750,000 for settlement of PAGA claims, and service awards of \$5,000 per named plaintiff. As discussed in greater detail below, Robinson and Zimmerman Reed moved to intervene in order to protect the rights of putative class members.

Zimmerman Reed's Opposition to Preliminary Approval of the *Marciano I* Settlement

29. Robinson and Zimmerman Reed opposed preliminary approval on December 4, 2019, arguing that the settlement did not meet the standard for preliminary approval. Robinson raised the following concerns:

- The overall Settlement Fund was likely inadequate because no *Kullar* analysis had been conducted to estimate the value of potential claims in relation to the settlement value;

- The settlement released Fair Labor Standards Act (“FLSA”) claims on an opt-out basis in contravention of the opt-in procedures set forth in 29 U.S.C. § 216(b);
- The proposed class notice was confusing because it did not mention the FLSA or any federal claim, and led members to believe that if they did not file a claim, they would not be able to participate in the settlement;
- The email notice was inadequate because it misstated material terms, and did not clearly state what class members needed to do;
- The exclusion and objection process added requirements to dissuade class members from opting out or objecting, most notably prohibiting opt-outs by electronic means;
- Exclusion forms were required to be personally signed by class members with a wet signature as opposed to being electronically signed or signed by their counsel, thereby interfering with the attorney-client relationships of class members and their counsel and the ability to opt-out in an efficient manner;
- The settlement offered inadequate PAGA relief;
- The proposed Settlement improperly doubled points for couriers seeking relief in arbitration or who had opted out of arbitration thereby treating class members differently;
- The release did not meet class settlement requirements because the release of named plaintiffs’ claims impermissibly differed from settlement class members’ release, causing the named plaintiffs to release more claims without sufficient consideration; and
- The settlement improperly included a dispute resolution fund allowing class members to be treated differently.

On March 30, 2020, Zimmerman Reed appeared for the Hearing on the Motion for Preliminary Approval and Motion to Intervene.

The Court Denied Preliminary Approval of the *Marciano I* Settlement Citing the Deficiencies Raised by Zimmerman Reed

30. On April 24, 2020, Judge Cheng issued the first tentative ruling denying preliminary approval and required the parties to submit supplemental briefing. Judge Cheng’s tentative ruling closely followed the objections made by Robinson and Zimmerman Reed and agreed that Class Counsel should

1 provide a *Kullar* analysis, justify the FLSA release, amend or explain the exclusion procedures, change
2 the distribution process, and explain why certain members who opted out of arbitration received double
3 mileage credit.

4 31. Judge Cheng noted that, "[t]he Court presently lacks information to evaluate whether
5 sufficient investigation and discovery were conducted . . . It appears that the only claim investigated was
6 the expense reimbursement claim." Tent. Ruling dated Apr. 24, 2020. This deficiency was a primary
7 objection raised by Robinson.

8 32. A comparison of both Zimmerman Reed's opposition and the court's tentative ruling
9 shows that the court outlined many of the same arguments Zimmerman Reed made only four months
10 earlier. Aside from the specific requests for declarations from named plaintiffs, all of the objections in
11 the tentative ruling mirror Zimmerman Reed's opposition. The court's concerns regarding the *Kullar*
12 analysis, the PAGA discount of .025% of the potential PAGA value, the proposal to double the mileage
13 credit of class members who opt-out of arbitration, the many issues with notice, and the release of FLSA
14 claims for class members who do not submit a claim form are the same substantive issues that
15 Zimmerman Reed raised. This tentative ruling served as the template for all future tentative rulings
16 regarding settlement approval.

17 **The *Marciano II* Settlement—June 8, 2020**

18 33. On June 8, 2020, Plaintiffs moved again for preliminary approval (the "*Marciano II*
19 Settlement"). The *Marciano II* Settlement addressed many of the concerns raised by Robinson and
20 Zimmerman Reed. The *Marciano II* Settlement amended the opt-out procedures to allow opt-outs via
21 email, edited the FLSA release to require an opt-in procedure, and added \$1.5 million to the settlement
22 for a total of \$41 million in the Settlement Fund and a PAGA allocation of \$2.25 million.

23 **The Court Denied Preliminary Approval of the *Marciano II* Settlement Citing Many of the**
24 **Concerns Zimmerman Reed Raised in its Initial Opposition**

25 34. On June 19, 2020, the court issued a second tentative ruling requiring Class to address
26 the release of local-ordinance claims, the valuation of class claims, the release of PAGA claims, the
27 distribution plan and notice, claim forms, the requests for exclusion, and the language in the release
28 regarding the FLSA claims and the favorable treatment to named plaintiffs.

1 35. Class Counsel was required to provide the factual basis to support the proposed \$41
2 million settlement amount in comparison to potential recovery and explain significant PAGA discounts,
3 among other things.

4 36. Following the second tentative ruling, Zimmerman Reed again appeared at the hearing
5 on Motion to Intervene on June 23, 2020.

6 **The *Marciano III* Settlement—July 24, 2020**

7 37. In response to the court’s concerns, Class Counsel submitted supplemental briefing and
8 the third proposed settlement agreement (the “*Marciano III* Settlement”) on July 24, 2020. Judge Cheng
9 denied preliminary approval on August 31, 2020 and required Class Counsel to provide a more thorough
10 *Kullar* analysis regarding the PAGA allocation and explain the preferential treatment of class members
11 who opted out of arbitration agreements with Defendant.

12 **The *Marciano IV* Settlement—November 4, 2020**

13 38. Following Judge Cheng’s denial of preliminary approval, the parties went to mediation
14 and agreed to exchange more information in order to make reasonable estimates for the claims at issue
15 and conduct a *Kullar* analysis as requested by Robinson and ordered by the court. These discussions led
16 to a vastly improved settlement agreement where Defendant would pay \$88.5 million into the Settlement
17 Fund and \$12 million to settle PAGA claims.

18 39. Though the *Marciano IV* Settlement provided generous terms and incorporated Judge
19 Cheng’s advisements, the court was concerned that the settlement agreement added in non-PAGA
20 claims to the settlement when the original claims were solely limited to PAGA. Since the parties added
21 in class claims, Judge Cheng did not want to change the original purpose of the suit.

22 **The Current *Marko* Settlement**

23 40. The parties returned to mediation and drafted the current *Marko* Settlement before this
24 Court with renewed efforts in discovery in consideration of Judge Cheng’s recommendations. After they
25 drafted a new settlement due to their efforts in mediation, the parties brought the settlement before this
26 Court. The revised settlement now includes \$100 million for the Settlement Fund and allocates \$12.5
27 million to settle PAGA claims. This is substantially improved from the first settlement agreement in
28 *Marciano* and provides favorable terms for the putative class. The journey from the *Marciano I*

1 Settlement to the current *Marko* Settlement has led to an improved deal which simultaneously addresses
2 our early concerns and those of the *Marciano* court.

3 **C. Fee-Sharing Agreement**

4 41. Class Counsel has organized counsel representing plaintiffs where they have agreed to
5 share in the fee award in this case. As described in the settlement agreement, Class Counsel will request
6 a fee award of 28% of the Settlement Fund, or \$28 million, in the concurrently filed Motion for
7 Attorneys' Fees, Service Awards and Costs. The attorneys have agreed to share any court awarded fee
8 as follows: 41% of the fee award to The Law Offices of Todd M. Friedman P.C. and Michael J. Hassen
9 of Reallaw APC, 40% to Lichten & Liss-Riordan, P.C., 3% to Capstone Law APC, 4% to Aegis Law
10 Firm, OC, 4% to The Graves Firm APC, 2% to The Parris Law Firm, 4% to Zimmerman Reed LLP, and
11 2% to Moss Bollinger.

12 **D. Relevant Exhibits**

13 42. Attached hereto as **Exhibit A** is a true and correct copy of Zimmerman Reed LLP's
14 leadership resume reflecting its experience as lead or liaison counsel in MDLs, with membership in
15 steering committees and subcommittees in MDLs, and as lead counsel in class action lawsuits.

16 43. A true and correct copy of Zimmerman Reed LLP's billing report in this and directly
17 related matters is attached hereto as **Exhibit B**.

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of
2 September, 2021 at Los Angeles, California.


3
4 
Caleb Marker

EXHIBIT A

ZIMMERMAN | REED

— FIRM RESUME

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FIRM PRACTICE AND ACHIEVEMENTS

Zimmerman Reed is a nationally recognized leader in complex and class action litigation and has been appointed as lead counsel in some of the largest and most complex cases in federal and state courts across the country. The firm was founded in 1983 and has successfully represented thousands of consumers and injured individuals nationwide in significant and demanding cases. The firm's practice includes a wide range of legal issues and complex cases involving consumer fraud, ERISA, shareholder actions, environmental torts, pharmaceutical drugs, dangerous or defective products, human rights violations, and privacy litigation. Since 2010, Zimmerman Reed has earned a "Best Law Firm" ranking released by U.S. News & World Report.

The following are just a few of the firm's notable achievements:

Co-Lead Counsel in the *Baycol Products Liability Litig.* (D. Minn.), seeking recovery for serious injuries from the use of Bayer's statin, Baycol. Achieved \$1.15 billion settlement.

Lead Counsel Committee member in the *Stryker Rejuvenate & ABG II Hip Implant Products Liability Litig.* (D. Minn.), seeking compensation for recalled Stryker hip replacements. Achieved in excess of \$1.4 billion settlement.

Co-Lead Counsel in the *Guidant Corp. Implantable Defibrillators Products Liability Litig.* (D. Minn.), arising out of malfunctions in cardiac defibrillators implanted in patients. Achieved \$230 million settlement.

Class and Derivative Counsel in the *Regions Morgan Keegan Securities, Derivative and ERISA Litig., Landers v. Morgan Asset Mgmt.* (W.D. Tenn.), alleging violations of federal securities laws and breach of fiduciary duty due to the collapse of Regions Morgan Keegan open-end funds. Achieved \$125 million settlement.

Class Counsel in *Soo Line R.R. Co. Derailment of Jan. 18, 2002 in Minot, N.D.* (Hennepin Cty. Dist. Ct.), representing hundreds of individuals injured by the release of anhydrous ammonia. Obtained a \$1.2 million jury verdict. Achieved a \$7 million class settlement and assisted congressional leaders in drafting and passing amendments to the Federal Railroad Safety Act, clarifying the scope of railroad preemption law.

Lead Counsel for the State of Mississippi in *Mississippi ex rel. Hood v. AU Optronics*, 571 U.S. 161 (2014), resulting in a unanimous U.S. Supreme Court decision reversing a Fifth Circuit decision, resolving a circuit split, and establishing binding law across the country that a State's enforcement action is not removable to federal court as a mass action.

Co-Lead Counsel in *Medtronic Implantable Defibrillators Products Liability Litig.* (D. Minn.), seeking recovery for more than 2,682 patients with recalled Medtronic heart defibrillators. Achieved a \$95.6 million settlement.

Class Counsel in *City of Farmington Hills Employees Retirement System v. Wells Fargo Bank, N.A.* (D. Minn.), to recover losses caused by the bank's mismanagement of its securities lending program. Achieved a \$62.5 million settlement, two days before trial.

Lead Counsel in *Dryer v. National Football League* (D. Minn.), arising out of the unauthorized use of retired NFL players' identities to generate revenue. Achieved a \$50 million settlement and created a ground-breaking program which allowed retired players the opportunity to benefit from the League's use of their images and allowed the League an opportunity to build its marketing using film clips of these former players.

Lead Counsel in *Target Corporation Customer Data Security Breach Litig.* (D. Minn.), to recover financial institutions' losses from the company's massive 2013 data breach. Achieved a \$39 million settlement.

Class Counsel in *The Shane Group Inc. v. Blue Cross Blue Shield of Michigan* (E.D. Mich.), against insurance carrier for violations of antitrust laws from contractually requiring hospitals to charge higher prices to competitors. Achieved a \$30 million settlement (pending final approval).

Lead Counsel in *Zicam Remedy Marketing, Sales Practices & Products Liability Litig.* (D. Ariz.), seeking to recover for customers' loss of the sense of smell from using Zicam Cold Remedy Nasal Gel. Achieved \$27 million settlement.

Counsel for third-party payor in *In re Metoprolol Succinate End-Payor Antitrust Litig.* (D. Del.), alleging that the manufacturing and marketing of the heart drug, Toprol-XL, violated antitrust and deceptive trade practices laws. Achieved \$20 million settlement.

Class Counsel in *Weincke v. Metropolitan Airports Commission* (Hennepin Cty. Dist. Ct.), regarding excessive noise levels from the Minneapolis-St. Paul International Airport. Achieved settlement to provide noise mitigation to more than 9,500 homeowners.

ACKNOWLEDGMENT OF THE FIRM'S WORK

Federal and state judges as well as legal scholars have consistently recognized the quality and impact of the firm's work on numerous occasions. Below are just a few examples.

"To summarize: class counsel recovered over ten times what is recovered in the typical case of this kind despite risks and complexities much more formidable than the typical case." Brian Fitzpatrick, Law Professor at Vanderbilt University and former clerk to Justice Scalia, expert in *In re Region Morgan Keegan Securities, Derivative and ERISA Litig., Landers v. Morgan Asset Mgmt.* (W.D. Tenn.)

"Fortunately for the absent class members, experienced counsel ... negotiated a settlement that is truly one-of-a-kind, and a remarkable victory for the class as a whole." Judge Paul Magnuson, *Dryer v. National Football League* (D. Minn.)

"I think no one can question your leadership in this matter. Again, thank you, and I say again it was the best decision I have ever made." Judge Michael Davis (former Chief Judge), *In re Baycol Products Liability Litig.* (D. Minn.)

"[S]uperior work the court observed from the firm throughout this litigation." Judge Donovan Frank, *In re Guidant Corp. Implantable Defibrillators Products Liability Litig.* (D. Minn.)

“The parties were represented by highly skilled and experienced counsel, who were extremely knowledgeable and clearly had spent a considerable amount of time developing the law and facts in this complex litigation.” Judge Layn Phillips (ret.), mediator in *In re Region Morgan Keegan Securities, Derivative and ERISA Litig., Landers v. Morgan Asset Mgmt.* (W.D. Tenn.)

It is “clear of the dedication, devotion, professionalism, and in the court’s view efficiency of these firms, so there is no question in the court’s mind of the quality of the representation.” Judge Deborah Batts, *In Re American Express Financial Advisors Securities Litig.* (S.D.N.Y.)

“Here, there is no doubt that the class has had competent counsel It’s been a pleasure ... to have counsel of this quality on both sides. I wish you would together go out and teach seminars about class action litigation. It would make my life a lot easier.” Judge Isabel Gomez, *Edwards v. Long Beach Mortgage Co.* (Hennepin Cty. Dist. Ct.)

“The reputation and experience of [Zimmerman Reed and co-counsel] to conduct class litigation of this nature is outstanding, and the record reflects that both law firms have successfully prosecuted numerous class actions in Minnesota courts and throughout the United States. The quality of representation in this case has been excellent, and the two firms are eminently qualified to serve as class counsel.” Judge Lloyd Zimmerman, *Holdhal v. BioErgonomics* (Hennepin Cty. Dist. Ct.)

REPRESENTATIVE LEADERSHIP POSITIONS

Zimmerman Reed has been appointed Lead or Liaison Counsel in the following MDLs:

CenturyLink Residential Customer Billing Disputes Litig., MDL 2795

National Hockey League Players’ Concussion Injury Litig., MDL 2551

Target Corporation Customer Data Security Breach Litig., MDL No. 2522

Stryker Rejuvenate and ABG II Hip Implant Products Liability Litig., MDL 2441

National Arbitration Forum Trade Practices Litig., MDL 2122

Zicam Cold Remedy Marketing, Sales Practices, and Products Liability Litig., MDL 2096

Northstar Education Finance, Inc. Contract Litig., MDL 1990

Zurn Pex Plumbing Products Liability Litig., MDL 1958

Levaquin Products Liability Litig., MDL 1943

Medtronic, Inc. Sprint Fidelis Leads Products Liability Litig., MDL 1905

Medtronic Implantable Defibrillators Products Liability Litig., MDL 1726

Viagra Products Liability Litig., MDL 1724

Guidant Corp. Implantable Defibrillators Products Liability Litig., MDL 1708

Pacquiao-Mayweather Boxing Match Pay-Per-View Litig., MDL 2639

Medco Health Solutions, Inc., Pharmacy Benefits Management Litig., MDL 1508

Baycol Products Liability Litig., MDL 1431

St. Jude Medical, Inc. Silzone Heart Valves Products Liability Litig., MDL 1396

Mortgage Escrow Deposit Litig., MDL 899

Zimmerman Reed has been appointed to the Plaintiffs' Executive Committee, Steering Committee, or Sub-Committees in the following MDLs:

Apple Inc. Device Performance Litig., MDL 2827
Dicamba Herbicides Litig., MDL 2820
Equifax, Inc. Customer Data Security Breach Litig., MDL 2800
Fieldturf Artificial Turf Marketing Practices Litig., MDL 2779
Stryker Orthopaedics LFIT V40 Femoral Head Products Liability Litig., MDL 2768
Abilify Products Liability Litig., MDL 2734
Vizio, Inc. Consumer Privacy Litig., MDL 2693
Viagra and Cialis Products Liability Litig., MDL 2691
The Home Depot, Inc., Customer Data Security Breach Litig., MDL 2583
LifeTime Fitness, Inc., Telephone Consumer Protection Act (TCPA) Litig., MDL 2564
National Collegiate Athletic Association Student-Athlete Concussion Litig., MDL 2492
H&R Block IRS Form 8863 Litig., MDL 2474
Biomet M2A Magnum Hip Implant Products Liability Litig., MDL 2391
National Football League Players' Concussion Injury Litig., MDL 2323
Building Materials Corp. of America Asphalt Roofing Shingle Products Litig., MDL 2283
Zimmer NexGen Knee Implant Products Liability Litig., MDL 2272
Uponor, Inc., F1807 Plumbing Fittings Products Liability Litig., MDL 2247
DePuy Orthopaedics, Inc., ASR Hip Implant Products Liability Litig., MDL 2197
Apple iPhone "MMS" Sales Practices Litig., MDL 2116
Digitek Products Liability Litig., MDL 1968
Fedex Ground Package System, Inc., Employment Practices Litig., MDL 1700
Bextra and Celebrex Marketing Sales Practices and Product Liability Litig., MDL 1699
Celebrex and Bextra Products Liability Litig., MDL 1694
Vioxx Products Liability Litig., MDL 1657
Neurontin "Off-Label" Marketing Litig., MDL 1629
Zyprexa Products Liability Litig., MDL 1596
Welding Rods Products Liability Litig., MDL 1535
Meridia Products Liability Litig., MDL 1481
Serzone Products Liability Litig., MDL 1477
Sulzer Inter-Op Orthopedic Hip Implant Litig., MDL 1401
Propulsid Products Liability Litig., MDL 1355
Rezulin Products Liability Litig., MDL 1348
Diet Drugs Products Liability Litig., MDL 1203
Telectronics Pacing Systems, Inc. Accufix Atrial "J" Lead Products Liability Litig., MDL 1057
Orthopedic Bone Screw Products Liability Litig., MDL 1014
Silicone Gel Breast Implant Products Liability Litig., MDL 926

Representative cases in which Zimmerman Reed has served as Class or Lead Counsel:

Adams v. DPC Enterprises, LP (Jefferson Cty. Cir. Ct., Mo.)
Adedipe v. U.S. Bank, N.A. (D. Minn.)
AI Plus, Inc. and IOC Distrib., Inc. v. Petters Group Worldwide (D. Minn.)
Arby's Restaurant Group, Inc., Data Security Litig. (N.D. Ga.)
Castano Tobacco Litig. (E.D. La.)
City of Farmington Hills Emps. Ret. Sys. v. Wells Fargo Bank, N.A. (D. Minn.)

City of Tallahassee Pension Plan v. Insight Enterprises, Inc. (Maricopa Cty. Super. Ct., Ariz.)
Cooksey v. Hawkins Chemical Co. (Henn. Cty. Dist. Ct., Minn.)
Coyle v. Flowers Food and Holsum Bakery (D. Ariz.)
Cuff v. Brenntag North America, Inc. (N.D. Ga.)
Daud v. Gold'n Plump Poultry, Inc. (D. Minn.)
DeKeyser v. ThyssenKrupp Waupaca, Inc. (E.D. Wis.)
Dockers Roundtrip Airfare Promotion Sales Practices Litig. (C.D. Cal.)
Doe v. Cin-Lan, Inc. (E.D. Mich.)
DeGrise v. Ensign Group, Inc. (Sonoma Cty. Super. Ct., Cal.)
Dryer v. National Football League (D. Minn.)
Ebert v. General Mills, Inc. (D. Minn.)
First Choice Fed. Credit Union v. The Wendy's Co. (W.D. Pa.)
Frank v. Gold'n Plump Poultry, Inc. (D. Minn.)
Garner v. Butterball, LLC (E.D. Ark.)
GLS Companies v. Minnesota Timberwolves Basketball LP (Henn. Cty. Dist. Ct., Minn.)
Haritos v. American Express Financial Advisors (D. Ariz.)
Helmert v. Butterball, LLC (E.D. Ark.)
Kurvers v. National Computer Systems, Inc. (Henn. Cty. Dist. Ct., Minn.)
Martin v. BioLab, Inc. (N.D. Ga.)
McGruder v. DPC Enterprises, LP (Maricopa Cty. Super. Ct., Ariz.)
Mehl v. Canadian Pacific Railway (D.N.D.)
Milner v. Farmers Insurance Exchange (D. Minn.)
Patlan, et al. v. BMW of North America, LLC (D.N.J.)
Ponce v. Pima County (Maricopa Cty. Super. Ct., Ariz.)
Regions Morgan Keegan [Landers v. Morgan Asset Mgmt.] (W.D. Tenn.)
Russo v. NCS Pearson, Inc. (D. Minn.)
Sanders v. Norfolk Southern Corporation (D.S.C.)
Scott v. American Tobacco Co. (Civ. Dist. Ct. Parish of New Orleans, La.)
Soo Line R.R. Co. Derailment of Jan. 18, 2002 in Minot, N.D. (Henn. Cty. Dist. Ct., Minn.)
Soular v. Northern Tier Energy, LP (D. Minn.)
State of Mississippi v. AU Optronics Corp. (Rankin Cty. Ch. Ct., Miss.)
State of New Mexico v. Visa, Inc. (Santa Fe Cty., N.M.)
Trauth v. Spearmint Rhino Companies Worldwide, Inc. (C.D. Cal.)
Weincke v. Metropolitan Airports Commission (Henn. Cty. Dist. Ct., Minn.)
Zicam Product Liability Cases (Maricopa Cty. Super. Ct., Ariz.)

ZIMMERMAN REED PARTNERS

Carolyn G. Anderson is a Managing Partner at Zimmerman Reed. She is co-chair of the Public Client & Attorney General practice and leads the firm's Securities & Financial Fraud practice group. Carolyn has successfully represented small investors, institutional clients, and states in individual and nationwide securities fraud, ERISA, and antitrust actions. She has served in a leadership role in obtaining significant recoveries in both individual actions and multi-state actions.

Carolyn currently represents two states in their investigation of and litigation related to the opioid crisis. Those cases involve pharmaceutical manufacturers, drug distributors, and pharmacies related to their roles in the ongoing opioid epidemic.

She is a member of the Lead Counsel Committee in nationwide litigation involving CenturyLink customers alleging they were overcharged and billed for services they didn't request or authorize. She also served as Lead Counsel in a case representing the State of New Mexico., where the State alleged antitrust and unfair practices against Visa and MasterCard. Carolyn also served as Lead Counsel in an action, asserting consumer fraud and antitrust violations, collaborating with a coalition of four Attorneys General, against manufacturers of LCD displays. The case was filed in state court but removed to federal court under the Class Action Fairness Act (CAFA). After opposing this removal at the district court and the Fifth Circuit, the State petitioned the U.S. Supreme Court. The Supreme Court ruled unanimously in favor of Mississippi, reversing the Fifth Circuit's decision and clarifying the standard for removal of state actions under CAFA. *Mississippi ex rel. Hood v. AU Optronics*, 571 U.S. 161 (2014).

Carolyn also represented the Office of Attorney General for the State of Mississippi, defending that Office in an action brought by Google, challenging the State's authority to issue a Civil Investigative Demand (CID). Google attempted to enjoin the Attorney General's CID authority and the district court granted that motion. In April, 2016, the State prevailed and the district court's decision was reversed by the Fifth Circuit.

Carolyn was also appointed Co-Lead Counsel on behalf of investors alleging losses due to Wells Fargo's securities lending program. The case settled for \$62 million, two days before trial was set to commence. She serves as Interim Co-Lead Counsel in an ERISA matter pending in the District of Minnesota against fiduciaries of U.S. Bancorp Pension Plan for violations of ERISA. Carolyn also served as Class Counsel on behalf of investors who had purchased bond funds from Morgan Keegan in a lawsuit that arose from the collapse of three mutual funds. The case also involved the auditor as a defendant. In 2016, the legal team achieved a \$125 million settlement with the assistance of mediator Layn Phillips, a former U.S. Attorney and former United States District Judge.

In prior representation, Carolyn represented large groups of investors with significant losses involving Merrill Lynch, AIG, Boston Scientific, and Lehman Brothers. Carolyn also led a legal team in a case brought by investors against American Express Financial Advisors, challenging that company's practices and breaches of fiduciary duty with its investing customers. The case, brought under the Investment Advisor Act, resulted in a \$100 million settlement. Carolyn also successfully represented Midwest farmers/shareholders who challenged an ethanol plant's merger with Archer Daniels Midland; she was appointed Class Counsel in that matter. The case was resolved weeks prior to trial. Carolyn was also appointed Lead Counsel in a securities fraud lawsuit involving Boston Scientific, representing a public pension fund and a certified class.

In addition to serving in positions of leadership in investor protection litigation, Carolyn currently represents *pro bono* one hundred not-for-profit organizations related to their losses from the \$3.6 billion Petters Ponzi scheme, centered in Minnesota. She was appointed by the federal judge to serve as Assistant Liquidating Trustee under the supervision of the Court and the Liquidating Trustee for assets being distributed to some of those investors. In *U.S. v. Petters*, No.

08-cv-05348 (D. Minn.), the Firm worked with the Department of Justice and the court-appointed receiver, to successfully recover and distribute millions of dollars to victims pursuant to a settlement with one of the Petters financiers.

Carolyn maintains strong ties with the National Association of Attorneys General, individual state Attorneys General, state pension fund officers, and other institutional investors. She is a lecturer at colleges and law schools, and has served as a legal education faculty member on the topics of complex litigation, legal ethics, the 2008 financial crisis, and securities law.

Carolyn currently serves as a board member with Bloomberg Law on its Litigation Innovation Board. She also serves as a board member and Chairperson for Children's Shelter of Cebu, an interdenominational organization for abandoned and neglected children.

Carolyn graduated cum laude from Trinity College, where she received a Bachelor of Arts degree in Psychology. She received her law degree cum laude from Hamline University School of Law where she was a Dean's Scholar, received the Cali Award for Excellence in Constitutional Law, and served on Hamline Law Review, where her case note article was selected for publication. Carolyn also studied law at Hebrew University in Jerusalem, Israel in course-work focusing on Law, Religion, & Ethics. Following law school, Carolyn served as a judicial extern to the Honorable Paul A. Magnuson, then Chief Judge for the U.S. District Court for the District of Minnesota. Carolyn has been honored as Rising Star of Law, has been recognized as a Super Lawyer since 2014 by her peers in Minnesota, and named to The Best Lawyers in America in the fields of Class Actions and Mass Tort Litigation since 2019.

Carolyn is admitted to practice before, and is a member in good standing of, the U.S. Supreme Court, the Court of Appeals for the Eighth Circuit, Fifth Circuit, and First Circuit, the United States District Court for the District of Minnesota, and the Bar of the State of Minnesota. In addition to these courts, Carolyn works on cases with local counsel nationwide. She is a member of Public Justice, the Federal Bar Association, the American Association for Justice, the Minnesota Bar Association, and the Hennepin County Bar Association.

David M. Cialkowski is a partner with Zimmerman Reed and dedicates a substantial portion of his practice to the area of complex and mass tort litigation, with a primary focus on antitrust and consumer protection litigation.

Dave Cialkowski has two decades of experience in complex and class litigation. His leadership and litigation skills have been recognized by state and federal courts and have led to his appointment as class counsel and to several MDL leadership positions.

Dave was a member of the legal team representing the *Mississippi Attorney General's Office* in *Mississippi ex rel. Hood v. AU Optronics*, 571 U.S. 161 (2014), an antitrust case against manufacturers of LCD displays, which presented the issue of whether an attorney general's parens patriae case is a "mass action" under the meaning of the Class Action Fairness Act. The Supreme Court ruled unanimously in Mississippi's favor.

On behalf of the firm, Dave served on the Steering Committee for the Commercial and Institutional Indirect Purchaser Plaintiffs in *In re Pork Antitrust Litigation*, No. 18-cv-1776 (D.

Minn.), on the Executive Committee for plaintiffs in *In re Crop Inputs Antitrust Litigation*, No. 21-md-02993 (E.D. Mo.), and as discovery team leader coordinating complex discovery in *In re Generic Pharmaceuticals Pricing Antitrust Litigation*, 16-md-2724 (E.D. Pa.), *In re Domestic Airline Travel Antitrust Litigation*, 15-mc-1404 (D.D.C), and *In re Hard Disk Drive Suspension Assemblies Antitrust Litigation*, 19-md-291 (N.D. Cal.).

Dave was also appointed to leadership positions in consumer protection class actions including as class counsel on behalf of consumers in the consolidated action *Hudock et al. v. LG Electronics U.S.A. Inc.*, 0:16-cv-01220 (D. Minn.), on behalf of the firm as Executive Committee member in *In re Generali COVID-19 Travel Insurance Litigation*, No. 20-md-2968 (S.D.N.Y), as a member of the Plaintiffs' Steering Committee in *In re Apple iPhone 3G and 3GS "MMS" Marketing and Sales Practices Litigation*, MDL 2116, and co-lead counsel in *In re Dockers Roundtrip Airfare Promotion Sales Practices Litigation*.

His extensive class action experience advanced the claims in *In re Fedex Ground Package Systems, Inc.*, MDL 1700, a multi-district consolidated proceeding involving 40 different state class actions challenging FedEx Grounds' independent contractor model. He also served as a lead counsel team member in *Target Corporation Customer Data Security Breach Litigation* (D. Minn.), to recover financial institutions' losses from the company's massive 2013 data breach.

In addition to his consumer protection and antitrust work, Dave is experienced in complex mass torts. He was a member of the lead counsel trial team in *Levaquin Products Liability Litig.*, MDL 1943, and represented plaintiffs in *In re St. Jude Silzone Heart Valves Product Liability Litigation*, MDL 1396. Dave also represented a class of people injured following a train derailment and chemical release in *In re Soo Line Railroad Company Derailment of January 18, 2002 in Minot, N.D.* His work and leadership led to a clarification in federal law which limited the application of railroad preemption.

In addition to being recognized by the courts, Dave is recognized by his peers as one of Minnesota's top 100 lawyers in 2020 and 2021, as a Super Lawyer in Minnesota from 2015-2021, and as a Rising Star in Minnesota from 2006-2008 and 2010-2013.

Dave is licensed to practice and a member in good standing, for the Bars of the State of Minnesota and the State of Illinois. He is also admitted to practice before, and is a member in good standing of, the U.S. Supreme Court, the Court of Appeals for the Eighth Circuit, and the United States District Courts for the District of Minnesota, Northern District of Illinois, and District of North Dakota.

Brian C. Gudmundson is a partner and has led and litigated numerous MDL and consolidated actions in recent years. He currently serves as court-appointed lead counsel in the Sonic data breach litigation on behalf of financial institutions, *In Re: Sonic Corp. Customer Data Security Breach*, 17-md-02807 (N.D. Ohio), and in the consolidated consumer action *Patlan, et al. v. BMW of North America, LLC*, 18-cv-09546 (D.N.J.), which alleges damages arising from risk of fire caused by defective BMW vehicles. Recently, Brian successfully led all plaintiff counsel on behalf of consumers in the settled MDL action *In Re: CenturyLink Sales Practices and Securities Litig.*, MDL 2795 (D. Minn.). Previously, Brian served as co-lead counsel in the consolidated Arby's data breach action on behalf of financial institutions, *In re: Arby's Restaurant Group, Inc., Data Security*

Litig., 17-cv-00514, (N.D. Ga.), and in the arbitration action *GLS Companies, et al. v. Minnesota Timberwolves Basketball LP*, which challenged implementation of the Timberwolves' paperless ticketing system and restrictions on transfer of game tickets.

In addition to serving as lead counsel, Brian has been appointed to and served on a number of steering committees, including in data breach actions on behalf of financial institutions such as *First Choice Fed. Credit Union v. The Wendy's Co.*, 16-cv-00506 (W.D. Pa.); the Home Depot data breach, MDL 2583 (N.D. Ga.); and Equifax data breach, MDL 2800 (N.D. Ga.), among others. Brian is a member of the lead counsel team that achieved a \$39 million settlement on behalf of banks and other financial institutions in recovering losses due to the 2013 Target data breach, MDL 2522. Brian has also served on executive committees in consumer actions, such as *FieldTurf Artificial Turf Marketing Practices Litigation*, MDL 2779 (representing schools, universities, municipalities, and private companies around the country that purchased allegedly defective artificial turf prone to rapid degradation); *Vikram Bhatia, D.D.S. v. 3M Company*, 16-cv-01304-DWF-TNL (settled action on behalf of dentists and dental practices for allegedly defective dental crown products); *Vizio, Inc. Consumer Privacy Litigation*, MDL 2693 (settled action asserting unlawful collection and sale of private consumer data);

Brian has also extensively litigated sports law cases, and represents hundreds of retired NFL players in claims arising from concussive head injuries on the field, MDL 2323 (E.D. Pa.). Brian also represented retired NHL players alleging the National Hockey League minimized concussion risks from its players for decades, MDL 2551 (D. Minn) and was a member of the lead counsel team that achieved a \$50 million settlement on behalf of retired National Football League players in a class action for the unauthorized use of former players' identities to generate revenue *In re: Dryer v. National Football League*, 09-cv-02182 (D. Minn.).

Brian also specializes in claims under the RICO Act and represented multiple non-profit and faith-based investors pro bono in RICO claims arising from the \$3.5 billion Petters Ponzi scheme.

Brian currently serves on the Steering Committee and Faculty of the Class Action Roundtable.

Brian received his BA from the University of Minnesota and his JD, *cum laude*, from the University of Minnesota Law School. Brian is admitted to the state courts of Minnesota, the U.S. District Courts for the District of Minnesota, the Northern District of Illinois, and the District of Colorado, and in the 4th Circuit Court of Appeals, 6th Circuit Court of Appeals, 8th Circuit Court of Appeals, and 10th Circuit Court of Appeals. His professional associations include membership in the Federal Bar Association, Minnesota State Bar Association, Hennepin County Bar Association, American Bar Association, and the American Association for Justice. Brian has been recognized as a Rising Star of Law 2010-2016 and a Super Lawyer in 2017 through 2020.

June P. Hoidal is a partner at Zimmerman Reed and co-chair of the Public Client & Attorney General practice group. She represents individuals and businesses who experience losses as a result of securities, consumer protection, and antitrust violations. June currently represents the State of Vermont and the State of Indiana in their investigation of and litigation related to the manufacturing, distribution, advertisement, dispensing, and marketing of opioid pain killers. She was a member of the legal team representing the State of Mississippi in a consumer fraud and antitrust action against manufacturers of LCD screens. Her work included assisting with briefing

before the U.S. Supreme Court, which unanimously ruled in favor of Mississippi by finding the State's *parens patriae* action was not removable to federal court. *Mississippi ex rel. Hood v. AU Optronics*, 571 U.S. 161 (2014). June also represented investors alleging losses due to Wells Fargo's securities lending program, a case that settled two days before trial was set to commence for \$62 million. She represented the State of New Mexico in a matter against Visa and MasterCard, alleging antitrust and unfair practices and investors of Medtronic in a shareholder derivative case. June currently represents participants of the U.S. Bancorp Pension Plan alleging violations of ERISA.

Prior to joining the firm, June served as a judicial law clerk to the Honorable Arthur J. Boylan on the United States District Court for the District of Minnesota. She gained substantial experience following law school at two law firms in Washington, D.C. and Minneapolis, practicing in diverse subject areas, including contract disputes, franchise, products liability, insurance, and employment law.

June currently serves as a board member and as the lead co-chair of the Associates Campaign for The Fund for Legal Aid. She also serves as a member of the Advisory Board for the Minnesota Urban Debate League and the Publications Committee for the Bench & Bar of Minnesota. Previously, she served as a Commissioner for the City of Saint Anthony Parks Commission, and a member of the Diversity Committee and the Women in the Legal Profession Committee of the Minnesota State Bar Association. In addition, June volunteered as an assistant debate coach for the Minnesota Urban Debate League and worked pro bono for Legal Assistance of Dakota County, Volunteer Lawyers Network, and The Advocates for Human Rights.

June graduated cum laude from the University of Minnesota Law School in 2003, where she was the Lead Managing Editor for the Minnesota Law Review and a member of the Dean's List. She is admitted to the state courts of Minnesota and the U.S. District Courts for the District of Minnesota. June has been recognized as a Rising Star of Law in 2007, 2015-2018 and a Super Lawyer since 2019.

Jason P. Johnston is a partner at the firm's Minneapolis office, focusing primarily on complex cases involving individuals injured by defective drugs and faulty medical devices, advocating for clients both locally and nationally. Jason's personal engagement, resolute view of the law, and solid practice style make him a strong voice for his clients and an integral part of our firm.

Jason represents clients injured from defective orthopedic hip devices manufactured by DePuy, Biomet, Stryker, Smith & Nephew and other manufacturers of hip replacement systems. In the Stryker Rejuvenate and ABG II Multidistrict Litigation (MDL), Jason represents patients who experienced serious health complications as a result of a modular hip that was recalled from the market. Jason also serves as a member of the Plaintiff Steering Committee in the Stryker LFIT V40 MDL. During the Biomet M2a hip litigation, Jason was a member of the Plaintiffs' Science Committee where he reviewed technical documents and participated in depositions involving the design and development of the hip implant systems. In the Zimmer NexGen knee litigation, Jason serves as a member of the Plaintiffs' Steering Committee and has played an active role in the science and discovery phases of the litigation, as well as preparing cases for trial.

Jason's medical device litigation experience extends beyond orthopedic devices, including, representing clients injured by defibrillators and leads manufactured by St. Jude, Medtronic, and Guidant. In the Medtronic Sprint Fidelis litigation, Jason served as a member of the Claims Review Committee following a mass settlement involving Sprint Fidelis leads. He has also represented plaintiffs injured by various pharmaceutical drugs, including, Abilify, Invokana, Viagra, Avandia, Aredia/Zometa, testosterone replacement therapy drugs, and other medications.

Jason has participated in pro bono service during his career, including accepting cases in the District of Minnesota's Federal Pro Se Project which provides *pro se* plaintiffs with volunteer counsel to improve access to justice in the Federal Courts. Jason is also an active member of the American Association for Justice and the Minnesota Association for Justice. In 2016, the Minnesota Association for Justice recognized Jason as the "Member of the Year" for his contributions to the organization.

Since 2014, Jason has been selected as a Minnesota Rising Star of Law by Super Lawyers a distinction award given to only 2.5% of attorneys in the state. In addition, Jason has also been selected as a member of The National Trial Lawyers Top 100 Trial Lawyers and Top 40 Under 40. A graduate of the University of St. Thomas School of Law, he was recognized by the Minnesota Justice Foundation for his pro bono service while attending law school. Prior to law school, Jason attended Winona State University, earning his Bachelor of Science degree, magna cum laude, in Marketing.

Jason has been recognized as a Rising Star of Law by Super Lawyers since 2014. He is admitted to the state courts of Minnesota and U.S. District Court for the District of Minnesota.

Caleb LH Marker is a partner at Zimmerman Reed, working at the firm's Los Angeles office. Caleb dedicates a significant portion of his practice to consumer protection and employment cases, including consumers, misclassified employees, mortgage borrowers, student loan borrowers, and senior citizens.

Caleb is a creative litigator who has been a leader in the consumer protection area and has been actively involved as class counsel in cases that have provided meaningful recoveries, through trial or settlement. He has first-chair trial experience in court and arbitration, having tried several cases to verdict and award. In 2016, he tried the first merits arbitration in the United States that alleged that a "gig economy" worker was an employee as opposed to an independent contractor and has continued to try and advance such cases in arbitration and courtrooms. He has briefed and argued appeals in California, Michigan, and the Ninth Circuit.

Caleb currently represents tobacco consumers as a member of the plaintiffs' steering committee for in the *Santa Fe Natural Tobacco Company Marketing and Sales Practices Litigation* (MDL 2695) currently pending in the U.S. District Court for the District of New Mexico. The Santa Fe MDL was recently the subject of an in-depth article published by Bloomberg Businessweek in an article entitled "Nature's Cancer Sticks: American Spirits Long, Strange Trip to Court."

Caleb leads the firm's involvement in representing a sexual assault survivor of Larry Nassar, the former Michigan State University team physician and U.S. Women's Gymnastics Team coach.

Nassar has been sentenced to up to 175 years in prison and dozens of high-ranking university and gymnastics officials have been ousted or face criminal investigations for their role in these heinous crimes. Among other issues, Caleb is defending Michigan P.A. 183 which provided a brief window for child sexual assault survivors to bring suit regardless of whether the statute of limitations had previously lapsed.

In recent years, Caleb's successes include leading a class action against the City of Los Angeles and Xerox that drew widespread media attention, winning a trial that now requires the City to end its decades-long outsourcing of the City's parking violations bureau in a case that will help over a hundred thousand motorists in Los Angeles in the next few years. Caleb later defended the trial court's verdict on appeal, resulting in a unanimous opinion fully affirming the trial court's verdict and award under the private attorney general doctrine. *Weiss v. City of Los Angeles*, 2 Cal. App. 5th 194 (August 8, 2016). Caleb has been a driving force in a number of class actions that have resulted in eight-figure settlements, including actions that involving misclassified employees, homeowners victimized by force-place insurance practices, patients at understaffed nursing homes, consumers of dangerous gas absorption refrigerators, and student loan borrowers who were overcharged for interest.

Caleb serves on the Los Angeles County Bar's Litigation Executive Committee and Access to Justice Committee, the latter of which aims to maximize the delivery of legal services to the poor and encourage attorneys to provide free legal services to those in need. Several of his successes have been recognized as a "Top Settlement & Verdict" by the Los Angeles Daily Journal and Michigan Lawyers Weekly. He has been interviewed by numerous media outlets, including NBC, Fox Business, NPR, *The Wall Street Journal*, AP, the *Los Angeles Times*, *LA Weekly*, and Law360. He has also been recognized as a Rising Star of Law in Southern California by Super Lawyers from 2015-2021, after a peer-nomination and review process awarded to less than 2.5% of attorneys under 40.

A native of Michigan, Caleb graduated from Michigan State University's James Madison College and College of Law. He is a member of the Los Angeles County Bar Association (LACBA), Duke Law's Bolch Judicial Institute and Electronic Discovery Reference Model (EDRM), the Federal Bar Association (FBA), the American Association for Justice (AAJ), Consumer Attorneys Association of Los Angeles (CAALA), and Consumer Attorneys of California (CAOC).

Hart L. Robinovitch is a partner with Zimmerman Reed, leading the firm's Scottsdale, Arizona office. Hart focuses his practice in the areas of consumer and shareholder actions, and sports law.

For the past decade, Hart has represented clients in a series of class action lawsuits contesting mortgage lenders' excessive billing and deposits practices for mortgage escrow accounts. Hart is now involved in numerous federal court lawsuits around the country alleging that mortgage banks and lenders have violated federal and state laws. These cases allege payment of kickbacks and/or illegal and unearned referral fees by the banks and lenders to mortgage brokers who refer mortgage clients who are then charged inflated interest rates on the mortgages. In addition, he represents consumers in other actions contesting the imposition of overcharges and improper fees or other contractual violations in various mortgage transactions. He has worked with co-counsel in state and federal courts across the country.

Hart currently represents corn farmers and DDGS exporters in the *Syngenta Viptera Litigation* who have experienced the effects of China's ban of U.S. corn and corn-derived products, suffering lower prices, decreased sales and other losses as the prices of U.S. corn has decreased. He is a member of the lead counsel team representing retired NHL players alleging the National Hockey League minimized the chronic cumulative effects of concussion risks from its players for decades. Hart also represents clients in a class action lawsuit on behalf of RV owners alleging that Norcold knew of a potentially dangerous RV refrigerator fire risk, but hid that information from the public.

Hart has been involved in numerous state and federal court lawsuits around the country challenging the misclassification of entertainers as independent contractors opposed to employees in the nightclub industry. He also represented consumers in other actions alleging deceptive and unlawful business conduct towards customers including, but not limited to, false advertising practices, "bait and switch" tactics, altering contractual terms without valid consideration, and retailers' requests and/or requirements that their customers provide personal identification information when they complete a transaction using their credit card, in violation of state and/or federal statutes. In addition, Hart represented residents of various skilled nursing facilities alleging pervasive and intentional failure to provide sufficient direct nursing care staffing resulting in harm to the residents.

A native of Canada, Hart earned his degree from the University of Toronto Law School in 1992 where he served as an Associate Editor on the University of Toronto Faculty of Law Review. He received his Bachelor of Science degree in 1989 from the University of Wisconsin-Madison.

Hart is admitted to practice before, and is a member in good standing of, the Bars of the States of Arizona and Minnesota and the United States District Court for the Districts of Arizona, Minnesota, and the Eastern District of Michigan. Hart is also licensed to practice law before the United States Courts of Appeals for the Sixth, Eighth, Ninth, and Eleventh Circuits, and the United States Supreme Court. Hart's memberships include the National Association of Consumer Advocates and Canadian American Bar Association.

J. Gordon Rudd, Jr. is a Managing Partner at Zimmerman Reed and represents representing clients in the areas of consumer protection, employment law, and mass torts. Gordon has been appointed class counsel in cases in state and federal courts across the country.

Gordon was recently part of the team that achieved a \$50 million settlement in the complicated court fight over publicity rights for retired NFL players. In a separate lawsuit, he represents hundreds of retired NFL players suffering from concussive head injuries that occurred while playing in the league. Gordon also represented thousands of individuals injured by the largest release of anhydrous ammonia in U.S. history. Two of those individuals were awarded \$1.2 million by a jury. Eventually, these trials led to a settlement on behalf of other residents of Minot, North Dakota injured by the derailment.

In mass tort litigation, Gordon leads several cases, including representing clients who developed gambling addictions after taking top-selling prescription drug Abilify; representing nursing home residents sickened by a Hepatitis C outbreak (the second-largest outbreak of the disease in

U.S. History); representing men who suffered cardiovascular injuries following their use of testosterone therapy supplements; and representing clients who experienced severe bleeding problems while taking Xarelto.

Gordon has also served on a number of multi-district litigation cases. He was a member of the lead counsel team representing banks and other financial institutions seeking recovery of losses from the 2013 Target data breach. He also holds leadership positions on several Plaintiffs' Steering Committees including *In re H&R Block IRS Form 8863 Litigation*, MDL 2474, *In re Life Time Fitness, Inc., Telephone Consumer Protection Act (TCPA) Litigation*, MDL 2564, *In re FedEx Ground Package System, Inc.*, MDL 1700, and *In re Building Materials Corp. of America Asphalt Roofing Shingle Products Liability Litigation*, MDL 2283.

Gordon graduated from Connecticut College, where he received a Bachelor of Arts degree in English Literature & Government. He received his law degree from the University of Cincinnati College of Law. Gordon is licensed to practice before, and is a member in good standing of, the Bar of the State of Minnesota and the United States District Court for the District of Minnesota. Gordon is admitted to the United States Court of Appeals for the Eighth Circuit. He has been admitted to appear pro hac vice in cases pending in the states of California, Oregon, Arizona, New Mexico, Texas, North Dakota, Ohio, Florida, Georgia, Tennessee, and Michigan. Gordon has been selected as a Super Lawyer by his peers in Minnesota since 2006 and recognized in The Best Lawyers in America in the fields of Class Actions and Mass Tort Litigation since 2018.

Behdad C. Sadeghi is a partner at Zimmerman Reed and a member of the firm's Attorney General practice. His practice focuses his practice on complex litigation involving consumer protection, securities and financial fraud, and antitrust law in state and federal courts.

Behdad currently is part of the Attorney General Practice, working with the team representing two states in the opioid litigation, conducting research, discovery, and motion practice. Behdad worked on the team representing investors who sustained losses as a result of alleged federal securities law violations by Morgan Keegan and its affiliates that achieved a \$125 million settlement. He also represented a class of financial institutions who suffered losses resulting from a major data breach in a class action against the Target Corporation that resulted in a \$39 million dollar settlement. In consumer litigation, he successfully achieved a multi-million dollar wrongful death settlement against a major automobile manufacturer, and a settlement on behalf of a group of elderly victims of one of the largest hepatitis C outbreaks in the nation's history. He also represents a putative class of consumers alleging violations of the Telephone Consumer Protection Act by Papa Murphy's and SuperAmerica.

Behdad graduated *magna cum laude* from William Mitchell College of Law, where he was a member of the William Mitchell Journal of Law and Practice and the Niagara International Moot Court Team; he also participated in the school's Civil Advocacy Clinic. His academic honors include a CALI Excellence for the Future Award, four Dean's List honors, and a Burton Award Nomination for Excellence in Legal Writing. Behdad has been recognized as a Rising Star of Law since 2019. Behdad is licensed to practice law in Minnesota.

ZIMMERMAN REED ATTORNEYS

Arielle Canepa is an associate at Zimmerman Reed, working in the firm's Los Angeles office. Her practice is focused on consumer protection and employment law cases, including high-interest consumer lending, independent contractor misclassification, and pay equity. She has specialized knowledge and experience in the technology sector — and earned a High Tech Law Certificate — and brings that expertise to her representation of consumers and employees.

Prior to joining the firm, Arielle worked as a project attorney for a data software company where she negotiated customer-facing nondisclosure agreements and reviewed subscription-based software license agreements. She also collaborated with team members to assure vendors' and partners' compliance with the California Consumer Privacy Act.

Arielle is a graduate of the Santa Clara University School of Law. While in law school, she interned with the in-house counsel of a global data cloud storage company where she focused on employment law. She also participated in the Pro Bono Business Law Clinic, counseling start-up founders and small business owners in contract, IP, licensing, franchise, and employment issues. Arielle is licensed to practice before and is a member in good standing of the Bar of the State of California.

Jennifer Haidar is an associate at Zimmerman Reed working in the firm's Los Angeles office. Her practice is focused on consumer protection and employment law, including gig economy employment misclassification, consumer privacy, breach of contract, and financial fraud cases.

Prior to joining the firm, Jennifer was a Post-Bar Legal Fellow for the Business and Tax Section of the California Department of Justice where she worked on financial and insurance fraud cases.

As a law student, Jennifer externed with the Office of Foreign Litigation for the U.S. Department of Justice, Civil Division, working at the American Embassy in London, England. She also externed with the Office of Justice for Victims of Overseas Terrorism for the U.S. Department of Justice, National Security Division in Washington, D.C.

Jennifer is a graduate of the University of Notre Dame Law School. While in law school, she was published in the Notre Dame Journal of Legislation and received the Dean's Award in English Legal System. Jennifer earned her B.A. from the University of California, Los Angeles (UCLA) in Global Studies and graduated cum laude with Highest Departmental Honors.

Jennifer speaks conversational Spanish and is a volunteer for the Los Angeles County Bar Association.

She is licensed to practice before and is a member in good standing of the California State Bar.

Richard Hansen graduated cum laude from the University of Wisconsin Law School, where he served as the Managing Editor of the Wisconsin Law Review and was admitted to the Order of the Coif. He is admitted to the state courts of Minnesota and Wisconsin, and the U.S. District Court for the District of Minnesota.

Following law school, Richard worked as a law clerk in the Minnesota Court of Appeals where he drafted bench memoranda and assisted with preparing judicial opinions. After his clerkship, he was an associate at a Minnesota firm that practices in a broad spectrum of areas, including antitrust, energy, and financial services law. In that position, Richard was responsible for preparing and drafting briefs for dispositive and non-dispositive motions, arguing motions in state court proceedings, and acted as lead associate in multiple cases which involved overseeing document collection and review.

Richard is an associate at Zimmerman Reed and a member of the firm's Public Client practice. His practice focuses on complex cases involving consumer fraud and environmental issues.

Andre S. LaBerge brings over twenty years of professional experience – as an attorney and as a business executive – in his advocacy for the rights of investors and consumers, providing counsel to several of the firm's practice areas. He has represented participants in Wells Fargo's securities lending program, investors with losses in Morgan Keegan open end bond funds, and the Office of Attorney General in the LCD antitrust litigation.

Andre has practiced law in Chicago and Minneapolis, and has represented clients at all court levels and in various regulatory forums. He has also served as Vice President, Chief Compliance Officer, General Counsel, and FINRA Registered Principal and Designated Supervisor in the financial services industry with companies that supervised and supported large numbers of securities brokers, financial planners, and insurance agents.

Andre is a graduate of DePaul University College of Law, where he was a Senior Editor for the Journal of Health and Hospital Law, and worked as a Mansfield Foundation Fellowship intern at Southern Minnesota Regional Legal Services. He is a member of the Minnesota State Bar Association and the Hennepin County Bar Association.

Michael J. Laird is an Associate at Zimmerman Reed and focuses his practice in the areas of sports law, data breach litigation, and consumer protection.

Michael currently represents hundreds of retired NFL players in the National Football League Concussion litigation. Former players sued the NFL alleging it downplayed the risk of progressive degenerative brain injuries caused by playing in the NFL. Michael has successfully obtained tens of millions of dollars on behalf of former players suffering degenerative brain injuries as part of the NFL Concussion Settlement. Michael also successfully represented former NHL players who alleged the National Hockey League was negligent in dealing with concussions and head injuries causing players to suffer serious brain injuries, including chronic traumatic encephalopathy (CTE).

In his data breach practice, Michael represents financial institutions and individuals affected by cyber-attacks that exposed their sensitive business and personal data. These cases seek to hold companies accountable for harm caused by their data breaches and allegedly inadequate data security. Michael has previously litigated against major companies responsible for some of the largest nationwide data breaches, including Equifax, Marriott, and Wendy's. He is currently litigating data breach cases against Sonic, Netgain, and ParkMobile.

In his consumer protection practice, Michael brings his broad experience to represent individuals and businesses who experienced consumer-related injuries. Currently, Michael represents pet owners whose pets suffered harm and, in some cases, died allegedly due to Elanco's flea and tick collar, Seresto. Michael also represents consumers and electrical contractors who claim Siemens manufactured defective arc fault circuit interrupters.

Michael graduated magna cum laude from the University of Minnesota Law School. During law school, he served as a member of the Journal of Law, Science & Technology and argued on the American Bar Association Moot Court team. He externed for the Honorable Jeffrey J. Keyes of the United States District Court for the District of Minnesota.

Michael is licensed to practice law in Minnesota.

Alyssa J. Leary focuses her practice on environmental and consumer protection law. In environmental protection, Alyssa represents corn farmers and exporters in the Syngenta litigation who suffered economic harm from the release of Syngenta's unapproved, genetically modified corn strain. She also represents farmers whose crops have been damaged by off-target drift from dicamba herbicides in litigation against Monsanto. In consumer protection, Alyssa is part of the team representing consumers alleging Pacquiao and his promoters kept his shoulder injury secret prior to the highly publicized Pacquiao-Mayweather Pay-Per-View fight.

Alyssa graduated magna cum laude and Order of the Coif from Tulane University Law School and holds a Certificate in Environmental Law. While at Tulane, she worked as an editor for the Tulane Law Review, and studied economic and environmental issues in Brazil.

In addition to her law degree, Alyssa holds a Master of Science in Resource Conservation and a Certificate in Natural Resource Conflict Resolution from the University of Montana. She obtained a Bachelor of Science degree in Biology/Natural Science from the University of Puget Sound.

Prior to joining Zimmerman Reed, Alyssa worked as a renewable energy and construction law attorney and interned at the U.S. Attorney's Office for the Eastern District of Louisiana, the U.S. Marshals Service Office of General Counsel in Washington D.C., and also for the Cottonwood Environmental Law Center in Bozeman, Montana. She serves on the ReGenerateMN Steering Committee for the Minnesota Center for Environmental Advocacy. Alyssa was recognized as a Rising Star of Law by Super Lawyers in 2021. She is licensed to practice law in Minnesota.

Ian F. McFarland is an associate at Zimmerman Reed and a member of the firm's Public Client & Attorney General practice. His practice focuses on complex cases involving antitrust, consumer fraud, and securities violations.

Following law school, Ian served as a law clerk to the Honorable Regina M. Chu, Minnesota District Court, Fourth Judicial District. He then moved to a litigation firm where he worked on a variety of complex litigation matters, including National Hockey League Players' Concussion Injury Litigation, Dental Supplies Antitrust Litigation, Aggrenox Antitrust Litigation, and the Target Customer Data Security Breach Litigation.

Ian graduated magna cum laude from the University of Wisconsin Law School, where he served as a Note and Comment Editor of the Wisconsin Law Review and was admitted to the Order of the Coif. While attending law school, he worked as a judicial intern to the Honorable Margaret J. Vergeront, Wisconsin Court of Appeals, District IV.

Kimberly McNulty is an associate at Zimmerman Reed and is a member of the Public Client practice group. She is part of the Opioid Litigation team, representing individual state Attorneys General in litigation against entities responsible for deceptive marketing, sale, and distribution of opioids. Kimberly is also part of the ZR team representing the State of Minnesota against e-cigarette manufacturer, JUUL, for its deceptive marketing practices and targeting of Minnesota's youth.

Prior to joining the firm, Kimberly was an associate attorney for another Minneapolis law firm representing businesses and individuals in all stages of complex commercial litigation. Prior to that, she worked as a Judicial Law Clerk to the Honorable Matthew E. Johnson. Kimberly is a graduate of the University of South Dakota School of Law with high honors. While in law school, she was the Lead Articles Editor for the South Dakota Law Review, member of the Trial Team, and intern with the United States Attorney's Office (District of South Dakota). Kimberly earned her B.A. from Creighton University in English.

Kimberly was recognized as a Rising Star of Law by Super Lawyers in 2021. She is licensed to practice before and is a member in good standing of the Bar of the State of Minnesota.

Flinn T. Milligan is an associate at Zimmerman Reed, working in the firm's Los Angeles office. He dedicates his practice to protecting consumers and workers in complex litigation, including cases involving consumer fraud and misclassified employees. Flinn has demonstrated his commitment to ensuring access to justice, especially for the most vulnerable members of our communities.

Prior to joining the firm, he worked at a non-profit, as a UC President's Public Interest Fellow. He assisted victims of PACE (property assessed clean energy) financing scams, ensuring that his clients stayed in their homes. He also worked on matters at the intersection of poverty and elder law, including debt collection, real estate, elder abuse, and access to estate funds. During law school, Flinn served as a law clerk for the Legal Aid Foundation of Los Angeles, working in the domestic violence clinic and the eviction defense center.

Flinn is a graduate of the UCLA School of Law. He also earned his B.A. from the University of Exeter (South West England, UK), during which he studied abroad at Iowa State University. Flinn is licensed to practice before and is a member in good standing of the Bar of the State of California.

Christopher P. Ridout is of counsel working in the firm's Los Angeles office practicing in the areas of complex litigation, including consumer protection, labor and employment, unfair business practices, false advertising, toxic tort, commercial and residential hazardous substance exposure.

Chris was appointed to serve on the Plaintiffs' Executive Committee in the iPhone Device Performance Litigation alleging that Apple released a software update that deliberately

diminished the battery life of older devices forcing customers to spend hundreds of dollars on replacement batteries and new phones. He was appointed as co-interim lead counsel representing a class of consumers in a mislabeling lawsuit alleging that Celestial Seasonings tea products falsely claim to be "all natural" when they contain pesticide residue from the agricultural process. In consumer litigation, Chris represents classes of consumers and employees in connection with data breaches that have compromised personal, financial, medical, and employment information. He represents a class of GM diesel truck owners alleging that the DMAX diesel engine design is defective causing a reduction in fuel efficiency by 25-30 percent. He served as class counsel reaching a \$52 million settlement on behalf of customers alleging the billing practices of the Los Angeles Department of Water contained excessive fees and inflated rates, and that the charges to customers exceeded the costs of provided water and power services. Chris obtained a \$36 million settlement representing RV owners in a class action lawsuit alleging that Norcold knew of a potentially dangerous RV refrigerator fire risk, but hid that information from the public. He also advocates on behalf of musicians and entertainers in Internet-related copyright and royalty disputes.

Over the last decade, Chris has been involved in the resolution of a series of class action lawsuits including a settlement of more than \$24 million on behalf of misclassified employees, an \$11.5 million settlement for Michigan students loan borrowers over an interest rate dispute, a \$9 million settlement claiming Naked Juice violated state and federal laws regarding the marketing and sale of its product, and a multi- million dollar award for residents of various nursing home facilities alleging widespread and intentional failure to provide sufficient care to the residents due to understaffing.

Chris attended Harvard University where he received his Bachelor of Arts Degree in 1986. While focusing on his major of American History, he was a member of the Harvard Varsity Football Team and played in the historic 100th Harvard-Yale match-up commonly referred to as "The Game." In his senior year, Chris was awarded the "William Payne LeCroix Memorial Award" given to that team member exhibiting the most loyalty and dedication to the Harvard Varsity Football Team.

After graduating from the University of the Pacific McGeorge School of Law in 1989, he was admitted to the California Bar that same year. He has also been admitted to practice before the United States District Court for the Southern, Central, and Northern Districts of California; the United States District Court for the District of Colorado; the United States District Court for the District of Minnesota; the United States District Court for the Northern District of Ohio; and the United States Court of Appeals for the Ninth Circuit.

Rachel K. Tack is an associate at Zimmerman Reed and a member of the firm's Consumer Protection practice and the Securities and Financial Fraud practice. She is currently representing financial institutions and consumers in data privacy actions.

Following law school, Rachel worked at a general practice firm where she concentrated on complex civil litigation and corporate disputes. Her litigation experience includes working directly with clients and developing skills in all areas of legal advocacy including drafting pleadings, conducting discovery, motion practice, oral arguments, and representing clients in

mediations and arbitration. Representing clients in this diverse practice honed her litigation expertise in state, tribal, and federal courts.

Rachel graduated from University of North Dakota Law School, where she served as a member of the North Dakota Law Review and the American Inns of the Court. While attending law school, Rachel served as a Chambers Legal External Clerk in the U.S. Bankruptcy Court where she gained hands-on experience in the courtroom, conducted extensive legal research, and assisted in preparing judicial opinions.

Rachel is admitted to the state courts of Minnesota and North Dakota and the U.S. District Courts for the District of Minnesota.

Charles R. Toomajian, III is an associate at Zimmerman Reed concentrating his practice in the consumer protection area and representing individuals injured by defective drugs or faulty medical devices. In the consumer protection context, Chuck represents public entities seeking recovery and finding solutions for the rampant harm caused nation-wide by the opioid crisis. He has also successfully represented individuals with claims under the TCPA. In the medical arena, he represents patients who took Abilify and experienced financial devastation as a result of compulsive gambling associated with the top-selling drug and patients who experienced severe injuries after taking the diabetes drug, Invokana. He also supports the firm's efforts in helping patients and families affected by the Stryker LFIT V40, involving recalled femoral heads that have been associated with hip replacement failure. Prior to joining Zimmerman Reed, Chuck worked at a multi-state trial and litigation firm advocating for injured clients.

A magna cum laude graduate from the University of Minnesota Law School, Chuck was a symposium editor for *Law and Inequality: A Journal of Theory and Practice*. He was a three-year consecutive Dean's List recipient and received the First Amendment law Book Award, a prestigious award for having the highest score in the class. He externed for the Honorable Mark Wernick of the Hennepin County District Court where he prepared and drafted memoranda and conducted legal research. He holds a Bachelor of Arts in English from Williams College.

Chuck was recognized as a Rising Star of Law by Super Lawyers in 2021. Chuck is licensed to practice before, and is a member in good standing of, the Bar of the State of Minnesota, the Bar of the State of California, and is admitted to the U.S. District Court for the Central District of California.

EXHIBIT B

Client: **1567.002C DoorDash Misclassification**

Robinson, LaRonda

Contact:

Robinson, LaRonda

Primary Timekeeper: 169 CLM Category: 43 Arbitration
 Secondary Timekeeper: 241 IES Draft Template: 00000001 Rate Code: 1
 Originating Timekeeper: 596 CA Final Template: 00000001 Date Opened: 12/02/2019
 Previous Balance: 0.00

Date	Tmkr	Cat	Src	H P	T X	B C	R C	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Write-Up/ Down Hrs	Amount	Write-Up/ Down Amt	Description
Fees																	
06/10/2019	237 SL	96						1	123	200.00		0.80	0.80		160.00		Arbitration Demand to Doordash by Certified Mail.
06/11/2019	237 SL	96						1	124	200.00		0.20	0.20		40.00		Receive and review correspondence from AAA re filing of Arbitration Demand and additional documents.
06/11/2019	237 SL	96						1	125	200.00		0.20	0.20		40.00		Receive and review email from CLM to AAA re Arbitration Agreement.
06/12/2019	237 SL	96						1	126	200.00		0.30	0.30		60.00		Receive and review correspondence from AAA re Acknowledging Receipt of Demand for Arbitration. Save to NetDOCS.
06/12/2019	237 SL	96						1	127	200.00		0.20	0.20		40.00		Receive and review email from Irene to AAA re Doordash Independent Contractor Agreement.
07/01/2019	237 SL	96						1	128	200.00		0.20	0.20		40.00		Receive and review email from AAA re filing fee for arbitration.
08/12/2019	237 SL	96						1	129	200.00		0.20	0.20		40.00		Receive and review email from AAA re Arbitrator Selection List.
08/12/2019	237 SL	96						1	130	200.00		0.20	0.20		40.00		Receive and review email from Mr. Andrew Spurchise re extension of arbitrator selection deadline.
08/12/2019	237 SL	96						1	131	200.00		0.20	0.20		40.00		Receive and review email from AAA confirmation extension to select arbitrator.
08/26/2019	169 CLM	96	P					1	132	650.00		1.00	1.00		650.00		Meeting re arbitrator selection
08/30/2019	237 SL	96						1	133	200.00		0.20	0.20		40.00		Receive and review email from AAA re Notice of Appointed Arbitrator.
08/30/2019	237 SL	96						1	134	200.00		0.20	0.20		40.00		Receive and analyze Notice of Appointing Arbitrator.
08/30/2019	237 SL	96						1	135	200.00		0.20	0.20		40.00		Receive and review Notice of Compensation Arrangements.
08/30/2019	237 SL	96						1	136	200.00		0.20	0.20		40.00		Receive and review CA Arbitrator Oath Form.
09/12/2019	169 CLM	96	P					1	137	650.00		0.60	0.60		390.00		Discuss [REDACTED] offer for Robinson
09/17/2019	237 SL	96						1	138	200.00		0.40	0.40		80.00		Receive and review AAA Correspondence re Preliminary hearing and scheduling order, and confirming appointment of arbitrator.
09/17/2019	237 SL	96						1	139	200.00		0.20	0.20		40.00		Receive and review email from Andrew Spurchise re October 1 hearing.
09/17/2019	237 SL	96						1	140	200.00		0.20	0.20		40.00		Receive and review email from Andrew Spurchise re availability.
09/17/2019	237 SL	96						1	141	200.00		0.20	0.20		40.00		Receive and review email from AAA re confirmation of availability.
09/18/2019	237 SL	96						1	142	200.00		0.20	0.20		40.00		Receive and review email from AAA re confirmation of case management call
09/19/2019	241 IES	96						1	143	400.00		1.00	1.00		400.00		Damages analysis for LaRonda Robinson
09/23/2019	241 IES	96						1	144	400.00		1.00	1.00		400.00		Correspondence with LaRonda Robinson regarding upcoming arbitration with DoorDash
09/23/2019	169 CLM	96	P					1	145	650.00		0.80	0.80		520.00		Review DoorDash [REDACTED] offer
09/25/2019	241 IES	96						1	146	400.00		5.00	5.00		2,000.00		Correspondence with LaRonda Robinson over DoorDash arbitration; computation of damages
09/30/2019	241 IES	96						1	147	400.00		6.00	6.00		2,400.00		Damages analysis for LaRonda Robinson v. DoorDash; meet with LaRonda to go over details of work with DoorDash; select information for [REDACTED] letter
10/01/2019	241 IES	96						1	148	400.00		8.00	8.00		3,200.00		Damages analysis for LaRonda Robinson v. DoorDash; confer with LaRonda; draft [REDACTED] letter
10/02/2019	237 SL	96						1	149	200.00		0.20	0.20		40.00		Receive and review email from IES re [REDACTED] letter.
10/02/2019	237 SL	96						1	150	200.00		0.20	0.20		40.00		Edit [REDACTED] letter.
10/02/2019	237 SL	96						1	151	200.00		0.20	0.20		40.00		Draft email to IES re [REDACTED] letter.
10/02/2019	237 SL	96						1	152	200.00		0.20	0.20		40.00		Receive and review email from IES re edits to [REDACTED] letter.
10/22/2019	237 SL	96						1	153	200.00		0.20	0.20		40.00		Receive and review AAA email regarding CMO No. 1.
10/22/2019	237 SL	96						1	154	200.00		0.20	0.20		40.00		Receive and analyze Notice of Hearing.
10/22/2019	237 SL	96						1	155	200.00		0.50	0.50		100.00		Receive and analyze Scheduling Order Transmittal. Calendar regarding same.
11/13/2019	237 SL	96						1	156	315.00		0.50	0.50		157.50		Receive and review IES email regarding RFP and ROGs Set 1. Draft email to IES regarding RFP and ROGs Set 1. Edit RFP and ROGs Set 1. Draft email to IES regarding RFP and ROGs Set 1. Receive and review CLM email regarding RFP and ROGs Set 1. Receive and

Client: **1567.002C DoorDash Misclassification** (Continued)

Date	Tmkr	Cat	Src	H P	T X	B C	R C	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Write-Up/ Down Hrs	Amount	Write-Up/ Down Amt	Description
																	review IES email regarding RFP and ROGs Set 1.
11/13/2019	241	IES	96					1	157	400.00		2.00	2.00		800.00		Draft objections to DoorDash RFPs
11/26/2019	10	HLR	96	P				1	3	805.00		0.50	0.50		402.50		Edit ██████ letter to defense counsel
11/27/2019	235	SAK	96	P				1	2	315.00		0.90	0.90		283.50		Review revise and edit letter to Doordash for FM signature; finalize and send; multiple emails to case team re same
12/02/2019	237	SL	96					1	158	315.00		0.20	0.20		63.00		Receive and review CLM email regarding deadline to respond regarding motion for preliminary approval.
12/02/2019	237	SL	96					1	159	315.00		0.20	0.20		63.00		Receive and review JGR email regarding deadline to respond regarding motion for preliminary approval.
12/02/2019	237	SL	96					1	160	315.00		0.20	0.20		63.00		Receive and review CLM email regarding deadline to respond regarding motion for preliminary approval.
12/02/2019	237	SL	96					1	161	315.00		0.20	0.20		63.00		Conference with CLM regarding deadline to respond regarding motion for preliminary approval.
12/02/2019	237	SL	96					1	162	315.00		0.20	0.20		63.00		Calendar deadline to file Opposition to Motion for Preliminary Approval.
12/02/2019	169	CLM	96	P				1	163	650.00		6.00	6.00		3,900.00		Draft and revise opposition to preliminary approval; confer with colleagues re concerns of class settlement
12/02/2019	7	JGR	96					1	164	805.00		0.50	0.50		402.50		Conference regarding recent settlement.
12/03/2019	241	IES	96					1	1	400.00		2.00	2.00		800.00		Review & edit complaint in intervention
12/03/2019	237	SL	96					1	165	315.00		0.20	0.20		63.00		Receive and review CLM email regarding deadline to object to settlement and declaration.
12/03/2019	237	SL	96					1	166	315.00		0.20	0.20		63.00		Receive and review FTM email regarding declaration.
12/03/2019	237	SL	96					1	167	315.00		0.20	0.20		63.00		Draft email to FTM regarding declaration.
12/03/2019	237	SL	96					1	168	315.00		0.20	0.20		63.00		Recevie and review email from FTM regarding declaration.
12/03/2019	237	SL	96					1	169	315.00		0.20	0.20		63.00		Recevie and review email from CLM regarding declaration.
12/03/2019	237	SL	96					1	170	315.00		0.50	0.50		157.50		Draft Declaration of CLM in opposition to motion for preliminary approval.
12/03/2019	237	SL	96					1	171	315.00		0.20	0.20		63.00		Receive and review FTM email regarding comparing two settlement documents.
12/03/2019	237	SL	96					1	172	315.00		1.00	1.00		315.00		Review and compare two settlement documents.
12/03/2019	237	SL	96					1	173	315.00		0.20	0.20		63.00		Recevie and review CLM email regarding edits to Declaration.
12/03/2019	237	SL	96					1	174	315.00		0.20	0.20		63.00		Recevie and review FTM email regarding CLM edits to Declaration.
12/03/2019	237	SL	96					1	175	315.00		0.70	0.70		220.50		Edit Declaration of CLM IOT Motion for Preliminary Approval. Prepare exhibits.
12/03/2019	237	SL	96					1	176	315.00		0.20	0.20		63.00		Draft email to FTM regarding exhibits to Declaration of CLM.
12/03/2019	237	SL	96					1	177	315.00		0.20	0.20		63.00		Receive and review FTM email regarding exhibits to Declaration of CLM.
12/03/2019	237	SL	96					1	178	315.00		0.20	0.20		63.00		Finalize Declaration of CLM with exhibits.
12/03/2019	237	SL	96					1	179	315.00		0.20	0.20		63.00		Draft email to CLM and FTM regarding finalized Declaration of CLM with exhibits.
12/03/2019	237	SL	96					1	180	315.00		0.50	0.50		157.50		Draft Proof of Service.
12/03/2019	169	CLM	96	P				1	181	650.00		5.00	5.00		3,250.00		Draft and revise opposition to preliminary approval of Marciano settlement
12/04/2019	237	SL	96					1	182	315.00		0.20	0.20		63.00		Recevie and review FTM email regarding Opposition to Motion for Preliminary Approval.
12/04/2019	237	SL	96					1	183	315.00		0.20	0.20		63.00		Conference with FTM regarding Opposition to Motion for Preliminary Approval.
12/04/2019	237	SL	96					1	184	315.00		1.50	1.50		472.50		Edit Opposition to Motion for Preliminary Approval. Check citations, create tables.
12/04/2019	237	SL	96					1	185	315.00		0.50	0.50		157.50		Edit Declaration of CLM IOT Motion for Preliminary Approval. Finalize with exhibits.
12/04/2019	237	SL	96					1	186	315.00		0.30	0.30		94.50		Edit and finalize Proof of Service.
12/04/2019	237	SL	96					1	187	315.00		0.20	0.20		63.00		Draft email to FTM regarding Opposition to Motion for Preliminary Approval, Declaration, and Proof of Service.
12/04/2019	237	SL	96					1	188	315.00		0.20	0.20		63.00		Conference with FTM regarding hearing on Motion for Preliminary Approval.
12/04/2019	237	SL	96					1	189	315.00		0.20	0.20		63.00		Calendar hearing on Motion for Preliminary Approval.
12/04/2019	237	SL	96					1	190	315.00		0.20	0.20		63.00		Conference with FTM regarding Opposition to Motion for Preliminary Approval.
12/04/2019	237	SL	96					1	191	315.00		0.20	0.20		63.00		Receive and review FTM email regarding Opposition to Motion for Preliminary Approval.

Client: **1567.002C DoorDash Misclassification** (Continued)

Date	Tmkr	Cat	Src	H P	T X	B C	R C	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Write-Up/ Down Hrs	Amount	Write-Up/ Down Amt	Description
12/04/2019	237 SL	96						1	192	315.00		1.00	1.00		315.00		Edit Opposition to Motion for Preliminary Approval.
12/04/2019	237 SL	96						1	193	315.00		0.50	0.50		157.50		Edit and finalize Declaration. Prepare exhibits. E-File regarding same. Serve by email.
12/04/2019	169 CLM	96 P						1	194	650.00		1.80	1.80		1,170.00		Finalize opposition to preliminary approval of Marciano settlement
12/10/2019	237 SL	96						1	195	315.00		0.40	0.40		126.00		Receive and review Proposed Intervenor's Ex Parte Application to Continue Hearing on Motion for Preliminary Approval. Proposed Order. Request to Appear at the Hearing by Telephone. And Proof of Service.
12/11/2019	237 SL	96						1	196	315.00		3.50	3.50		1,102.50		Receive and review Supplemental Declaration of LLR ISO Mtn for Prelim Apporval, and exhibits thereto. Receive and review Proof of Service regarding Supplemental Declaration of LLR ISO Mtn for Prelim Apporval, and exhibits thereto. Receive and review Supplemental Declaration of LLR ISO Mtn for Prelim Apporval with Exs. Receive and review Proof of Service regarding Supplemental Declaration of LLR ISO Mtn for Prelim Apporval with Exs. Receive and review Plaintiff's Opposition to Non-Party Objecter's Ex Parte Application to Reschedule Hearing on Motion for Prelim Approval.
12/11/2019	169 CLM	96 P						1	197	650.00		3.00	3.00		1,950.00		Prepare for ex parte to intervene in Marciano
12/12/2019	237 SL	96						1	198	315.00		3.00	3.00		945.00		Recevie and review Defendant's Opposition to Objecter's Ex Parte Application to Reschedule Hearing on Motion for Preliminary Approval, and Proposed Order. Conference with FTM regarding Motion to Intervene, calendaring, and case status. Recevie and review Objecter Romero's Notice of Motion and Motion for Leave to Intervene, Memorandum in support thereof, Declaration, Proposed Order, and proof of service. Calendar hearing date.
12/12/2019	169 CLM	96 P						1	199	650.00		6.00	6.00		3,900.00		Appear for ex parte to intervene in Marciano; travel to and from SF
12/19/2019	237 SL	96						1	200	315.00		0.60	0.60		189.00		Receive and review Joint Stipulation to Continue Hearing on Mtn for Preliminary Approval. And Proof of Service.
01/06/2020	237 SL	96						1	201	315.00		0.20	0.20		63.00		Receive and review CLM email regarding continuance of hearing on motion for preliminary approval and motion to intervene.
01/06/2020	237 SL	96						1	202	315.00		0.20	0.20		63.00		Check case docket regarding hearing on motion for preliminary approval and motion to intervene.
01/06/2020	237 SL	96						1	203	315.00		0.20	0.20		63.00		Update previous calendar entry regarding hearing on motion for preliminary approval and motion to intervene. Calendar new hearing date for motion for preliminary approval and motion to intervene.
01/13/2020	7 JGR	96 P						1	204	805.00		0.75	0.75		603.75		DoorDash - conferences regarding Marciano case and objection and potential resolution of ZR claims.
01/14/2020	237 SL	96						1	205	315.00		0.20	0.20		63.00		Receive and review Consolidated Opposition to Non-Parties' Motion to Intervene, and Proof of Service.
01/15/2020	237 SL	96						1	206	315.00		0.30	0.30		94.50		Receive and review CLM email regarding hearing on Motion for Prelim Approval. Check docket regarding continuance of hearing on Motion for Prelim Approval. Update calendar entry of hearing on Motion for Prelim Approval.
01/15/2020	237 SL	96						1	207	315.00		0.20	0.20		63.00		Receive and review Order Continuing CMC. Calendar regarding same.
01/15/2020	237 SL	96						1	208	315.00		0.20	0.20		63.00		Receive and review CLM email regarding Wallace v. Grubhub. Set up docket tracking for CLM .
01/17/2020	7 JGR	96 P						1	209	805.00		1.50	1.50		1,207.50		DoorDash - conference regarding upcoming hearing and objection argument; discuss with Caleb.
01/20/2020	241 IES	96						1	4	400.00		0.50	0.50		200.00		Email AAA requesting stay in Robinson v. DoorDash
01/20/2020	7 JGR	96 P						1	210	805.00		0.25	0.25		201.25		DoorDash - conference regarding

Client: 1567.002C DoorDash Misclassification (Continued)

Date	Tmkr	Cat	Src	H P	T X	B C	R C	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Write-Up/ Down Hrs	Amount	Write-Up/ Down Amt	Description
01/21/2020	7 JGR	96	P					1	211	805.00		0.25	0.25		201.25		preliminary approval hearing. DoorDash - conference call re: number of clients and tracking re: same for objection and mediation potential.
01/24/2020	237 SL	96						1	212	315.00		0.20	0.20		63.00		Receive and review Plaintiff's Reply in Support of Motion for Preliminary Approval.
01/24/2020	169 CLM	96	P					1	213	650.00		1.00	1.00		650.00		
01/24/2020	7 JGR	96	P					1	214	805.00		0.75	0.75		603.75		DoorDash - conferences regarding status of objection and preliminary approval.
01/28/2020	237 SL	96						1	215	315.00		0.20	0.20		63.00		Receive, scan and analyze Order Designating Action as Complex and Vacating January 30, 2020 Hrg Date.
01/28/2020	237 SL	96						1	216	315.00		0.20	0.20		63.00		Update previous calendar entry of 2020-1-30 Hearing per Order Designating Action as Complex and Vacating January 30, 2020 Hrg Date.
02/06/2020	237 SL	96						1	217	315.00		0.30	0.30		94.50		Receive, review and save to NetDocs Objectors' Reply in Support of Motion to Intervene, Declaration in Support thereof, and POS.
02/10/2020	7 JGR	96	P					1	218	805.00		0.50	0.50		402.50		DoorDash - review opinion and discuss with Caleb.
02/13/2020	169 CLM	96	P					1	219	650.00		0.60	0.60		390.00		Confer re preliminary approval
02/13/2020	7 JGR	43	P					1	220	805.00		0.50	0.50		402.50		DoorDash- discuss status of preliminary approval hearing and objections.
02/14/2020	237 SL	96						1	221	315.00		1.00	1.00		315.00		Receive and review CLM email regarding rescheduling of CMC and hearing on Motion for Preliminary Approval and Motion to Intervene. Review and analyze Order Reassigning Case to Department 613. Calendar new dates and deadlines per Order. Update previous calendar entries.
02/18/2020	237 SL	96						1	222	315.00		0.20	0.20		63.00		Receive and review CLM email regarding hearing on 3/23. Update calendar entry of hearing on 3/23.
02/20/2020	237 SL	96						1	5	315.00		0.20	0.20		63.00		Receive and review JAMS email regarding proposed revised scheduling order.
02/25/2020	237 SL	96						1	223	315.00		0.20	0.20		63.00		Send IES calendar invite for upcoming hearing .
02/27/2020	237 SL	96						1	224	315.00		0.20	0.20		63.00		Receive and review Notice of Change in Counsel
02/27/2020	237 SL	96						1	225	315.00		0.30	0.30		94.50		Receive and review Proposed Intervenor and Objector's Motion to Stay and Memorandum. Receive and review declaration in support thereof, and Proposed Order.
03/04/2020	237 SL	96						1	226	315.00		0.10	0.10		31.50		Receive and review objector's motion to stay, Declaration of Keller in Support of motion to stay, Proposed Order regarding Motion to Stay.
03/04/2020	237 SL	96						1	227	315.00		0.10	0.10		31.50		Receive and review Order Continuing 3/23 hearing on Motion for Preliminary Approval and Motion to Stay. Calendar regarding same.
03/12/2020	237 SL	96						1	6	315.00		0.60	0.60		189.00		Receive and review CLM email regarding amendments to CMO No. 1. Calendar dates and deadlines according to CLM email. Update previous calendar invite.
03/17/2020	169 CLM	96	P					1	228	650.00		0.90	0.90		585.00		Coordinate rescheduling hearing on preliminary approval with co-counsel and opposing counsel
03/23/2020	237 SL	96	P					1	7	315.00		0.20	0.20		63.00		Receive and review AAA email re evidentiary hearing.
03/23/2020	237 SL	96	P					1	8	315.00		0.20	0.20		63.00		Receive and analyze Revised Notice of Evidentiary Hearing.
03/23/2020	237 SL	96	P					1	9	315.00		0.20	0.20		63.00		Update calendar invite for status Conference per Revised Notice of Evidentiary Hearing.
03/23/2020	237 SL	96	P					1	10	315.00		0.20	0.20		63.00		Update calendar invite for evidentiary hearing per Revised Notice of Evidentiary Hearing.
03/26/2020	237 SL	96						1	229	315.00		0.20	0.20		63.00		Receive, download and review Proposed iIntervenor's Notice of Withdrawal of Motion for Leave to Intervene.
04/07/2020	241 IES	96						1	11	400.00		0.25	0.25		100.00		Update emails with LaRonda Robinson.
05/01/2020	241 IES	96						1	12	400.00		4.00	4.00		1,600.00		Update DoorDash Mediation Brief
05/15/2020	237 SL	96						1	230	315.00		0.20	0.20		63.00		Receive and review CLM email re email from court re tentative ruling. Calendar deadline to notify court re the parties' position on tentative ruling on motion for leave to intervene.

Client: **1567.002C DoorDash Misclassification** (Continued)

Date	Tmkr	Cat	Src	H P	T X	B C	R C	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Write-Up/ Down Hrs	Amount	Write-Up/ Down Amt	Description
06/09/2020	237 SL	96						1	231	315.00		0.20	0.20		63.00		Receive and review Supplemental Brief in Support of motion for Preliminary Approval and Declarations.
06/16/2020	237 SL	96						1	232	315.00		0.20	0.20		63.00		Receive and review CLM email regarding courtcall for 6/23 hearing on motion for preliminary approval and motion to intervene. Draft email to CLM regarding courtcall.
06/16/2020	237 SL	96						1	233	315.00		0.40	0.40		126.00		Set up CourtCall for CLM for 6/23 hearing on motion for preliminary approval and motion to intervene.
06/16/2020	237 SL	96						1	234	315.00		0.20	0.20		63.00		Receive and review CourtCall confirmation, service copy, and invoice.
06/16/2020	237 SL	96						1	235	315.00		0.20	0.20		63.00		Draft email to Norma regarding invoice.
06/16/2020	237 SL	96						1	236	315.00		0.20	0.20		63.00		Update calendar invite for 6/23 motion hearing to include courtcall confirmation.
06/17/2020	237 SL	96						1	237	315.00		0.20	0.20		63.00		Receive and review CourtCall Service Copy.
06/18/2020	166 AMC	96	P					1	238	465.00		1.20	1.20		558.00		Review declaration and briefs
06/18/2020	241 IES	96						1	239	400.00		0.50	0.50		200.00		Call regarding DoorDash settlement clients
06/19/2020	237 SL	96						1	240	315.00		0.20	0.20		63.00		Receive and review CLM email regarding email from Department 613 regarding change of hearing. Review and analyze department 613 email regarding change of hearing. Calendar updated hearing time and hearing type per department 613 email regarding change of hearing.
06/19/2020	237 SL	96						1	241	315.00		0.20	0.20		63.00		Messages with FTM regarding CourtCall for hearing on Motion to Intervene.
06/19/2020	237 SL	96						1	242	315.00		0.20	0.20		63.00		Receive and review CLM email regarding Tentative Ruling on Motio for Preliminary Approval.
06/19/2020	237 SL	96						1	243	315.00		0.70	0.70		220.50		Contact CourtCall to change hearing time for courtcall per Department 613 email regarding change of hearing time.
06/19/2020	237 SL	96						1	244	315.00		0.20	0.20		63.00		Receive and review CourtCall confirmation for 6/23 hearing on motion to intervene.
06/19/2020	237 SL	96						1	245	315.00		0.20	0.20		63.00		Messages with FTM regarding courtCall attachment to calendar invite. Update calendar invite to reflect CourtCall information.
06/19/2020	237 SL	96						1	246	315.00		0.40	0.40		126.00		Manage case files in NetDocs.
06/23/2020	169 CLM	43	P					1	247	650.00		2.60	2.60		1,690.00		Call with objectors and coordinate responses
06/23/2020	169 CLM	43	P					1	248	650.00		2.00	2.00		1,300.00		Court re motion to intervene; prepare for same
06/26/2020	169 CLM	43	P					1	249	650.00		1.10	1.10		715.00		Review filings re tentative on motion to intervene; research re same; confer with co-counsel
08/13/2020	237 SL	43						1	250	315.00		0.20	0.20		63.00		Receive and review Amended Notice of Motion and Motion to Appear Pro Hac Vice by Ricardo Prieto and exhibits.
09/15/2020	237 SL	43						1	251	315.00		0.20	0.20		63.00		Review and analyze Notice of Federal Court Order and Request for Repsonses, and Proof of Service.
09/22/2020	237 SL	43						1	252	315.00		0.20	0.20		63.00		Check docket and calendar for upcoming hearings.
09/29/2020	237 SL	43						1	253	315.00		0.20	0.20		63.00		Receive and analyze Joint Stipulation and Proposed Order to Reset Briefing Scheduling regarding Revised Motion for Preliminary Approval.
10/01/2020	237 SL	43						1	254	315.00		0.20	0.20		63.00		Receive and analyze Order Granting Joint Stipulation to Reset Briefing Schedule on Motion for Preliminary Approval. Calendar deadline to submit revised Motion for Preliminary Approval.
11/03/2020	7 JGR	43						1	17	805.00		2.00	2.00		1,610.00		Review and revise individual and master settlement agreements; email to group.
11/05/2020	237 SL	43						1	255	315.00		0.20	0.20		63.00		Receive and review CLM email regarding filings. Download Supplemental Brief in Support of Motion for Preliminary Approval, Declaration in Support thereof, PO and POS.
11/05/2020	7 JGR	43						1	256	805.00		0.25	0.25		201.25		Draft email to CLM regarding same.
11/06/2020	7 JGR	43						1	16	805.00		0.20	0.20		161.00		Conference regarding Doordash settlement and applying for fees.
11/06/2020	7 JGR	43						1	257	805.00		1.25	1.25		1,006.25		Robinson v. Doordash - conference regarding status of data.
11/09/2020	218 TMO	43	P					1	13	315.00		0.50	0.50		157.50		Marciano v. DoorDash - conference regarding improved settlement; look up NFL objection regarding objector fees.
																	Teleconference with JGR; locate and email NFL Objector briefs.

Client: **1567.002C DoorDash Misclassification** (Continued)

Date	Tmkr	Cat	Src	H P	T X	B C	R C	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Write-Up/ Down Hrs	Amount	Write-Up/ Down Amt	Description
11/09/2020	218 TMO	43	P					1	14	315.00		1.50	1.50		472.50		Review emails from JGR; locate additional briefing on objectors request for attorney fees; email JGR
11/09/2020	7 JGR	43						1	258	805.00		0.50	0.50		402.50		Meeting regarding fee motion on class case.
11/10/2020	237 SL	43						1	259	315.00		0.20	0.20		63.00		Check docket for upcoming hearing information. Messages to CLM regarding same.
11/13/2020	218 TMO	43	P					1	15	315.00		0.25	0.25		78.75		Review email from JGR; locate and email documents to JGR
11/13/2020	7 JGR	43						1	260	805.00		2.00	2.00		1,610.00		Work on fee motion re: objection and review NFL and other pleadings; conference with Tina re: same.
11/16/2020	7 JGR	43						1	261	805.00		1.50	1.50		1,207.50		Work on fee motion regarding objection; locate NFL documents and review; meeting regarding case status.
11/17/2020	7 JGR	43	P					1	262	805.00		0.30	0.30		241.50		Marciano v. DoorDash - review briefing from NFL and forward to Caleb regarding objection.
11/17/2020	237 SL	43						1	263	315.00		0.20	0.20		63.00		Receive and review Objector's Memorandum of Points and Authorities in Opposition to Motion for Preliminary Approval.
11/18/2020	7 JGR	43	P					1	264	805.00		0.25	0.25		201.25		Marciano v. DoorDash - send materials to Hart and Caleb and review order approving fees in NFL; respond to Caleb.
11/18/2020	169 CLM	43	P					1	266	650.00		1.30	1.30		845.00		Meeting re notice of withdrawal; research and drafting re same
11/19/2020	7 JGR	43	P					1	265	805.00		0.75	0.75		603.75		Marciano v. DoorDash - review NFL pleadings for objection.
11/23/2020	237 SL	43						1	267	315.00		0.20	0.20		63.00		Receive and review Plaintiffs Objection to Milos Antic Opposition to Motion for Preliminary Approval of Class Action Settlement and Request to Strike Opposition. Draft email to CLM regarding same.
12/07/2020	237 SL	43						1	268	315.00		0.20	0.20		63.00		Receive and review FTM email regarding Robinson's Opposition to Motion for Preliminary Approval.
12/07/2020	237 SL	43						1	269	315.00		0.20	0.20		63.00		Draft shell Robinson's Notice of Withdrawal of Opposition to Motion for Preliminary Approval.
12/07/2020	237 SL	43						1	270	315.00		0.20	0.20		63.00		Draft email to FTM regarding shell Robinson's Notice of Withdrawal of Opposition to Motion for Preliminary Approval.
12/08/2020	237 SL	43						1	271	315.00		0.20	0.20		63.00		Check docket/calendar for upcoming hearing information. Messages to CLM regarding same.
12/08/2020	7 JGR	43	P					1	272	805.00		1.25	1.25		1,006.25		DoorDash - check status of DoorDash settlement and fee petition timing; prepare for conference with DoorDash counsel; conference with Littler regarding opt out provisions of Marciano and effect on our claims.
12/14/2020	237 SL	43						1	273	315.00		0.20	0.20		63.00		Receive and reievew email from Gordon regarding revised settlement agreement and Motion for Prelim Approval. Draft email to Gordon regarding same.
01/04/2021	237 SL	43						1	274	315.00		0.20	0.20		63.00		Receive and review Objector's Notice of Motion and Motion to Intervene and releant documents. Calendar hearing on Obejctor's Motion to intervene.
01/07/2021	237 SL	43						1	275	315.00		0.20	0.20		63.00		Receive and review Notice of Withdrawal of Objector's Motion to Intervene and Objection to Motion for Preliminary Approval.
01/19/2021	241 IES	43						1	276	400.00		2.00	2.00		800.00		Update letter for LaRonda Robinson
01/20/2021	237 SL	43						1	277	315.00		0.20	0.20		63.00		Check court calendar for upcoming hearing information.
01/20/2021	237 SL	43						1	278	315.00		0.20	0.20		63.00		Review and analyze Order Setting Motion for Preliminary Approval. Calendar regarding same.
01/21/2021	241 IES	43						1	279	400.00		1.00	1.00		400.00		Email to LaRonda & call regarding status of DoorDash case
01/22/2021	169 CLM	43	P					1	280	720.00		0.50	0.50		360.00		Call with IES and client LaRonda Robinson re case update and next step.
01/26/2021	237 SL	43						1	18	315.00		0.20	0.20		63.00		Receive and review CLM email regarding call regarding revised agreement. Cross-check with CLM calendar for call information.
01/26/2021	7 JGR	43	P					1	281	845.00		0.75	0.75		633.75		DoorDash - conferences regarding Cole Marciano settlements and offset; review term

Client: **1567.002C DoorDash Misclassification** (Continued)

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02/04/2021	237 SL	43						1	282	315.00		0.20	0.20		63.00		sheet with Caleb and discuss same. Receive and review Plaintiff's Opposition to Non-Party's Objection to Motion for Preliminary Approval.
02/04/2021	7 JGR	43 P						1	283	845.00		3.25	3.25		2,746.25		DoorDash - review and edit draft notice of withdrawal of objection; review final documents.
02/05/2021	7 JGR	43 P						1	284	845.00		0.75	0.75		633.75		DoorDash - continue edits of withdrawal of objection and conference regarding same.
02/12/2021	237 SL	43						1	285	315.00		0.20	0.20		63.00		Receive and review Plaintiffs Opposition to Non-Party Kevin Saunders Ex Parte Motion to Intervene
02/17/2021	237 SL	43						1	286	315.00		0.20	0.20		63.00		Receive and review CLM email regarding rescheduled hearing on Motion for Preliminary approval.
02/17/2021	237 SL	43						1	287	315.00		0.20	0.20		63.00		Calendar rescheduled hearing on Motion for Preliminary approval, and set up courtcall reminder.
02/17/2021	169 CLM	43 P						1	288	720.00		0.20	0.20		144.00		(Marciano) Draft email to JSL regarding rescheduled hearing on Motion for Preliminary approval.
02/19/2021	237 SL	43						1	289	315.00		0.20	0.20		63.00		Receive and review Tentative Ruling on Motion for Preliminary Approval.
02/19/2021	169 CLM	43 P						1	290	720.00		0.20	0.20		144.00		Receive and review Tentative Ruling on Motion for Preliminary Approval.
03/05/2021	237 SL	43						1	291	315.00		0.20	0.20		63.00		Calendar continued hearing on Motion for Preliminary Apprval and reminder for CourtCall.
03/16/2021	237 SL	43						1	292	315.00		0.20	0.20		63.00		Review tentative ruling denying motion for preliminary approval.
03/16/2021	237 SL	43						1	293	315.00		0.20	0.20		63.00		Draft email to JGR regarding Motion for Preliminary Approval and Settlement Agreement AND tentative ruling denying motion for preliminary approval.
03/16/2021	237 SL	43						1	365	315.00		0.20	0.20		63.00		Receive and review JGR email regarding Motion for Preliminary Approval. Review docket for case filings.
03/24/2021	237 SL	43						1	294	315.00		0.30	0.30		94.50		Messages with IES regarding Opposition and Withdrawal.
03/24/2021	237 SL	43						1	295	315.00		0.20	0.20		63.00		Review court docket for filings.
03/24/2021	237 SL	43						1	296	315.00		0.20	0.20		63.00		Draft email to IES regarding docket sheet.
03/24/2021	237 SL	43						1	297	315.00		0.20	0.20		63.00		Messages with IES regarding shell notice of withdrawal of Opposition.
03/24/2021	237 SL	43						1	298	315.00		0.20	0.20		63.00		Draft email to IES and FTM regarding Notice of Withdrawal of Opposition.
03/25/2021	237 SL	43						1	299	315.00		0.20	0.20		63.00		Receive and review Plaintiffs' Opposition to Non-Party Saunders' Motion to Intervene.
03/30/2021	241 IES	43						1	300	400.00		0.50	0.50		200.00		Emails with LaRonda Robinson
04/01/2021	237 SL	43						1	301	315.00		0.40	0.40		126.00		Continue reviewing and analyzing Further Revised Settlement Agreement as Exhibit A attached to eclaration of Shannon Liss-Riordan in Support of Plaintiffs' Supplemental Brief in Support of Motion for Preliminary Approval.
04/01/2021	237 SL	43						1	302	315.00		0.30	0.30		94.50		Draft email to FTM regarding Opt-Out Requirements.
04/01/2021	169 CLM	43 P						1	303	720.00		0.30	0.30		216.00		Conference with FTM regarding Opt-Out Requirements.
04/01/2021	237 SL	43						1	366	315.00		0.20	0.20		63.00		Receive and review FTM email regarding Opt-Out Requirements.
04/02/2021	237 SL	43						1	304	315.00		0.20	0.20		63.00		Receive and review FTM email regarding Opt-Out Requirements. Review settlement agreement for Opt-out Requirements.
04/02/2021	237 SL	43						1	305	315.00		0.20	0.20		63.00		Draft email to FTM regarding Declaration of LLR in Support of Motion for Preliminary Approval.
04/02/2021	237 SL	43						1	306	315.00		0.20	0.20		63.00		Review docket. Draft email to FTM regarding docket.
04/02/2021	169 CLM	43 P						1	307	720.00		0.50	0.50		360.00		Conferece with FTM regarding Opt-Out Requirements from settlement agreement.
04/02/2021	169 CLM	43 P						1	308	720.00		0.50	0.50		360.00		Attend to details re case development with team.
04/06/2021	237 SL	43						1	309	315.00		0.20	0.20		63.00		Review and analyze Procedures for Department 613 and COVID Information on Court's website.
04/06/2021	237 SL	43						1	310	315.00		0.20	0.20		63.00		Set up CourtCall for CLM for 4/8 Hearing on Motion for Preliminary Approval.
04/06/2021	237 SL	43						1	311	315.00		0.20	0.20		63.00		Draft email to Norma regarding CourtCall invoice for 4/8 Motion Hearing.
04/06/2021	237 SL	43						1	312	315.00		0.20	0.20		63.00		Review CourtCall confirmation for 4/8

Client: **1567.002C DoorDash Misclassification** (Continued)

Date	Tmkr	Cat	Src	H P	T X	B C	R C	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Write-Up/ Down Hrs	Amount	Write-Up/ Down Amt	Description
04/07/2021	7 JGR	43						1	313	845.00		0.20	0.20		169.00		Hearing on Motion for Preliminary Approval. Add CourtCall instructions to calendar invite. Conference with Caleb regarding status of settlement and Marciano settlement hearing being vacated.
04/07/2021	237 SL	43						1	314	315.00		0.20	0.20		63.00		Review docket for filing and 4/8 hearing update. Cancel 4/8 hearing per Order Vacating April 8 Hearing.
04/07/2021	237 SL	43						1	315	315.00		0.20	0.20		63.00		Cancel CLM CourtCall for 4/8 Hearing.
04/07/2021	237 SL	43						1	316	315.00		0.20	0.20		63.00		Draft email to Norma regarding cancellation of CourtCall and refund.
04/07/2021	237 SL	43						1	317	315.00		0.20	0.20		63.00		Receive and review Refund/Cancellation confirmation from CourtCall.
04/07/2021	237 SL	43						1	318	315.00		0.20	0.20		63.00		Receive and analyze Order Vacating April 8, 2021 Hearing.
04/07/2021	237 SL	43						1	319	315.00		0.20	0.20		63.00		Calendar deadline to file Joint Case Management Conference Statement per Order.
04/07/2021	237 SL	43						1	320	315.00		0.20	0.20		63.00		Receive and analyze Plaintiffs' Notice of Withdrawal of Motion for Preliminary Approval.
04/08/2021	237 SL	43						1	321	315.00		0.20	0.20		63.00		Receive and review Courtcall Refund Receipt.
04/08/2021	609 JKS	43	P					1	367	545.00		0.60	0.60		327.00		Follow up Marko docket and DD settlement admin
04/12/2021	7 JGR	43						1	322	845.00		0.50	0.50		422.50		Conferences with JKS and CLM regarding Marco settlement; plan for settlement implementation.
04/12/2021	169 CLM	43	P					1	323	720.00		0.20	0.20		144.00		Review and analyze Marko docket.
04/14/2021	169 CLM	43	P					1	324	720.00		0.20	0.20		144.00		Review and analyze Marko docket.
04/18/2021	609 JKS	43	P					1	368	545.00		0.10	0.10		54.50		Review Marko motion for class settlement
04/19/2021	237 SL	43						1	19	315.00		0.30	0.30		94.50		Call with CLM, FTM, and JGR regarding DoorDash Marko Touchpoint.
04/19/2021	237 SL	43						1	20	315.00		0.20	0.20		63.00		Draft Notice of Relevant Authorities in Support of Objection to Motion for Preliminary Approval.
04/19/2021	237 SL	43						1	21	315.00		0.20	0.20		63.00		Call with FTM regarding Notice of Relevant Authorities in Support of Objection to Motion for Preliminary Approval.
04/19/2021	237 SL	43						1	22	315.00		1.40	1.40		441.00		Edit Notice of Withdrawal of Opposition to Motion for Preliminary Approval and List of Opposition and Objection filed in Marciano, and Tentative Rulings issued.
04/19/2021	237 SL	43						1	23	315.00		0.20	0.20		63.00		Draft email to FTM regarding List of Opposition and Objection filed in Marciano, and Tentative Rulings issued and Notice of Withdrawal of Opposition to Motion for Preliminary Approval
04/19/2021	237 SL	43						1	24	315.00		0.20	0.20		63.00		Draft email to CLM and FTM re List of Opposition and Objection filed in Marciano, Messages to FTM regarding tentative rulings issued in Marciano.
04/19/2021	237 SL	43						1	25	315.00		0.20	0.20		63.00		Messages with FTM re Opposition to Motion for Preilm Approval filed by objector
04/19/2021	237 SL	43						1	26	315.00		0.20	0.20		63.00		LaRonda Robinson in Marciano.
04/19/2021	237 SL	43						1	27	315.00		0.50	0.50		157.50		Review docket and filings in Marciano for various versions of proposed settlement submission.
04/19/2021	237 SL	43						1	28	315.00		0.20	0.20		63.00		Draft email to FTM regarding submission dates of various versions of proposed settlement in Marciano.
04/19/2021	237 SL	43						1	29	315.00		0.30	0.30		94.50		Messages with FTM regarding response filed to LaRonda Robinson's Opposition to Motion for Prleim Approval. Review filings in Marciano v. Doordash. Draft message to FTM regarding date of Reply filed in response thereto.
04/19/2021	237 SL	43						1	325	315.00		0.20	0.20		63.00		Review filings in Marko v. DoorDash, Inc., Case No. BC659841 (Los Angeles Super. Ct.). Review and generate docket sheet. Circulate to team.
04/19/2021	609 JKS	43	P					1	326	545.00		2.10	2.10		1,144.50		Review Marko motion for class settlement; revise excision drafted by Flinn
04/19/2021	169 CLM	43	P					1	327	720.00		0.30	0.30		216.00		Review and edit Notice of Relevant Authorities in Support of Objection to Motion for Preliminary Approval.
04/19/2021	169 CLM	43	P					1	328	720.00		0.20	0.20		144.00		Review and analyze List of Opposition and Objection filed in Marciano,
04/19/2021	169 CLM	43	P					1	369	720.00		0.30	0.30		216.00		Call with JSL, FTM, and JGR regarding DoorDash Marko Touchpoint.
04/20/2021	237 SL	43						1	30	315.00		0.20	0.20		63.00		Receive and review FTM email regarding

Client: 1567.002C DoorDash Misclassification (Continued)

Date	Tmkr	Cat	Src	H P	T X	B C	R C	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Write-Up/ Down Hrs	Amount	Write-Up/ Down Amt	Description
04/20/2021	237 SL	43						1	31	315.00		0.30	0.30		94.50		LaRonda Robinson's Notice of Withdrawal of Objections to Class Action Settlement.
04/20/2021	237 SL	43						1	370	315.00		0.20	0.20		63.00		Review and edit LaRonda Robinson's Notice of Withdrawal of Objections to Class Action Settlement.
04/21/2021	237 SL	43						1	32	315.00		0.20	0.20		63.00		Manage case documents in NetDocs.
04/21/2021	237 SL	43						1	33	315.00		0.20	0.20		63.00		Check docket for new filings in Marko v. Doordash. . Review filings.
04/21/2021	237 SL	43						1	33	315.00		0.20	0.20		63.00		Draft email to team regarding new filings in Marko v. Doordash.
04/21/2021	169 CLM	43 P						1	329	720.00		0.20	0.20		144.00		Review and analyze Marko docket.
04/22/2021	237 SL	43						1	330	315.00		0.20	0.20		63.00		Check docket of Marko v. DoorDash (LASC Case Number BC659841) for case status.
04/22/2021	237 SL	43						1	331	315.00		0.20	0.20		63.00		Calendar Status Conference and Hearing on Motion for Preliminary Approval in Marko v. DoorDash (LASC Case Number BC659841)
04/23/2021	169 CLM	43 P						1	332	720.00		0.50	0.50		360.00		Call with Jahan C. Sagafi re status of Marko v. DoorDash.
04/26/2021	237 SL	43						1	34	315.00		0.20	0.20		63.00		Check docket of Marko v. Doordash (LASC Case Number: BC659841) for case status.
04/26/2021	237 SL	43						1	35	315.00		0.20	0.20		63.00		Receive and review CLM email regarding sample Motion for Attorney Fee for case Marko v. Doordash (LASC Case Number: BC659841)
04/27/2021	237 SL	43						1	36	315.00		0.20	0.20		63.00		Calendar reminder to check with CLM regarding fee petition in case Marko v. Doordash (LASC Case Number: BC659841)
04/27/2021	237 SL	43						1	333	315.00		0.20	0.20		63.00		Check docket for case update in Marko v. DoorDash, LASC Case Number BC659841.
04/27/2021	237 SL	43						1	334	315.00		0.20	0.20		63.00		Draft email to team regarding new filing in Marko v. DoorDash, LASC Case Number BC659841.
05/03/2021	169 CLM	43 P						1	335	720.00		2.00	2.00		1,440.00		Tasks related to Marciano class action settlement; review SLR declaration and compare new settlements
05/04/2021	237 SL	43						1	37	315.00		0.20	0.20		63.00		(Marko v. DoorDash, LASC BC659841) Check docket for case update. Draft email to CLM, FTM and Jennifer Sustacek regarding case update.
05/04/2021	237 SL	43						1	38	315.00		0.20	0.20		63.00		Calendar rescheduled hearing on motion for preliminary approval per case calendar.
05/05/2021	237 SL	43						1	336	315.00		0.20	0.20		63.00		Check docket of case Marko v. DoorDash (LASC BC659841) for updates.
05/10/2021	169 CLM	43 P						1	337	720.00		0.20	0.20		144.00		Review and analyze docket of Marko v. DoorDash.
05/17/2021	169 CLM	43 P						1	338	720.00		0.20	0.20		144.00		Review and analyze Marko docket.
05/19/2021	237 SL	43						1	339	315.00		0.20	0.20		63.00		(Marko v. DoorDash) Review and analyze Minute Order regarding Hearing on Motion for Preliminary Approval.
05/19/2021	237 SL	43						1	340	315.00		0.40	0.40		126.00		(Marko v. DoorDash) Revie and analyze Declaration of Shannon liss-Riordan in Support of Motion for Preliminary Approval.
05/19/2021	237 SL	43						1	341	315.00		0.60	0.60		189.00		(Marko v. DoorDash) Revie and analyze Declaration of Todd Friedman in Support of Motion for Preliminary Approval.
05/19/2021	237 SL	43						1	371	315.00		0.20	0.20		63.00		(Rimler v. Postmates) Messages with FTM regarding comparison of settlement numbers DoorDash and Postmates.
05/19/2021	237 SL	43						1	372	315.00		0.20	0.20		63.00		Draft email to Norma regarding receipts for documents from LA Court.
05/19/2021	237 SL	43						1	373	315.00		0.60	0.60		189.00		(Rimler v. Postmates) Review and analyze Proposed Class Action Settlement Agreement.
05/19/2021	237 SL	43						1	374	315.00		0.40	0.40		126.00		Comparison of settlement numbers in DoorDash and Postmates.
05/19/2021	169 CLM	43 P						1	375	720.00		0.50	0.50		360.00		Team strategy meeting; review outstanding tasks and litigation update
05/19/2021	169 CLM	43 P						1	376	720.00		0.50	0.50		360.00		RReview and compare numbers/data regarding class action settlement agreements.
05/19/2021	169 CLM	43 P						1	377	720.00		0.30	0.30		216.00		Review and compare numbers/data regarding class action settlement agreements.
05/20/2021	237 SL	43						1	342	315.00		0.60	0.60		189.00		Edit Chart of Comparison of settlement numbers in DoorDash and Postmates.
05/20/2021	237 SL	43						1	343	315.00		0.20	0.20		63.00		Review CLM edits to Chart of Comparison of settlement numbers in DoorDash and Postmates.
05/20/2021	237 SL	43						1	344	315.00		0.30	0.30		94.50		Review and analyze docket for versions of proposed settlement agreement in Marciano

Client: **1567.002C DoorDash Misclassification** (Continued)

Date	Tmkr	Cat	Src	H P	T X	B C	R C	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Write-Up/ Down Hrs	Amount	Write-Up/ Down Amt	Description
05/20/2021	237 SL	43						1	345	315.00		1.20	1.20		378.00		v. DoorDash. Review all versions of proposed settlement agreement in Marciano v. DoorDash.
05/20/2021	237 SL	43						1	346	315.00		0.60	0.60		189.00		Edit Chart of Comparison of settlement numbers in DoorDash and Postmates to include numbers in Marciano v. DoorDash.
05/20/2021	241 IES	43						1	347	400.00		1.50	1.50		600.00		Review Notice
05/20/2021	169 CLM	43 P						1	348	720.00		1.00	1.00		720.00		Review and edit Claimant's Motion in Limine.
05/20/2021	169 CLM	43 P						1	349	720.00		0.50	0.50		360.00		Review and edit Chart of Comparison of settlement numbers
05/24/2021	169 CLM	43 P						1	350	720.00		0.20	0.20		144.00		Review and analyze Marko docket.
05/24/2021	169 CLM	43 P						1	378	720.00		0.50	0.50		360.00		Attend to details re case development with team.
05/26/2021	237 SL	43						1	39	315.00		0.20	0.20		63.00		(Marko v. DoorDash) Check docket for filing update.
05/26/2021	169 CLM	43 P						1	351	720.00		0.20	0.20		144.00		(Marko v. DoorDash) review and analyze docket.
05/26/2021	169 CLM	43 P						1	379	720.00		0.50	0.50		360.00		Attend to details re case development with team.
05/28/2021	169 CLM	43 P						1	380	720.00		0.50	0.50		360.00		Team strategy meeting; review outstanding tasks and litigation update
06/02/2021	237 SL	43						1	40	315.00		0.30	0.30		94.50		(Marko v. DoorDash) Check docket for update of filings.
06/02/2021	237 SL	43						1	41	315.00		0.20	0.20		63.00		(Marko v. DoorDash) Check with CLM regarding Fee Petition.
06/15/2021	237 SL	43						1	43	315.00		0.20	0.20		63.00		Call from CLM regarding Objections filed in Rimler v. Postmates and Marciano v. DoorDash.
06/15/2021	237 SL	43						1	44	315.00		0.20	0.20		63.00		Draft email to CLM regarding Objections filed in Rimler v. Postmates and Marciano v. DoorDash.
06/15/2021	169 CLM	43 P						1	352	720.00		0.50	0.50		360.00		Review and analyze Objections filed in Rimler v. Postmates and Marciano v. DoorDash.
06/15/2021	169 CLM	43 P						1	353	720.00		0.20	0.20		144.00		Receive and review JSL email regarding Objections filed in Rimler v. Postmates and Marciano v. DoorDash.
06/16/2021	237 SL	43						1	45	315.00		0.20	0.20		63.00		(Marko v. DoorDash) Check court docket for upcoming hearings. Messages with Jennifer S regarding same.
06/16/2021	237 SL	43						1	46	315.00		0.20	0.20		63.00		Receive and analyze voice mail from client LaRonda Robinson regarding settlement amount. Draft email to IES regarding same.
06/18/2021	7 JGR	43						1	354	845.00		0.75	0.75		633.75		Conference calls regarding Marciano preliminary approval; conference call regarding status of settlement administration.
07/09/2021	237 SL	43						1	47	315.00		0.20	0.20		63.00		(Marko v. DoorDash) Check docket for case updates and hearings.
07/09/2021	237 SL	43						1	48	315.00		0.20	0.20		63.00		Messages to CLM regarding updates in Marko v. DoorDash.
07/09/2021	237 SL	43						1	49	315.00		1.00	1.00		315.00		Review and analyze court notices regarding new video platform for hearings. Review and analyze most recent General Order. Review and analyze COVID notices.
07/09/2021	237 SL	43						1	50	315.00		0.30	0.30		94.50		Set up remote appearance for 7/12 hearing on Motion for Preliminary Approval in Marko v. DoorDash for CLM.
07/09/2021	237 SL	43						1	51	315.00		0.20	0.20		63.00		Review and analyze confirmation for audio appearance for 7/12 hearing on Motion for Preliminary Approval in Marko v. DoorDash for CLM.
07/09/2021	237 SL	43						1	52	315.00		0.20	0.20		63.00		Calendar audio instructions for for 7/12 hearing on Motion for Preliminary Approval in Marko v. DoorDash for CLM.
07/09/2021	237 SL	43						1	53	315.00		0.20	0.20		63.00		Draft email to Noram regarding receipt for audio appearance for 7/12 hearing on Motion for Preliminary Approval in Marko v. DoorDash for CLM.
07/12/2021	237 SL	43						1	54	315.00		0.20	0.20		63.00		(Marko v. DoorDash) check docket for hearing update.
07/12/2021	237 SL	43						1	55	315.00		0.20	0.20		63.00		(Marko v. DoorDash) Receive and review CLM email regarding public access line for Hearing on Motion for Preliminary Approval.
07/12/2021	237 SL	43						1	56	315.00		0.20	0.20		63.00		(Marko v. DoorDash) Draft email to CLM regarding public access line for Hearing on Motion for Preliminary Approval.
07/12/2021	237 SL	43						1	57	315.00		0.20	0.20		63.00		(Marko v. DoorDash) Messages with CLM regarding public access line for Hearing on Motion for Preliminary Approval.

Client: **1567.002C DoorDash Misclassification** (Continued)

Date	Tmkr	Cat	Src	H P	T X	B C	R C	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Write-Up/ Down Hrs	Amount	Write-Up/ Down Amt	Description
07/14/2021	237 SL	43						1	58	315.00		0.20	0.20		63.00		(Marko v. Doordash) Review and analyze docket for case update. Calendar fairness hearing per docket.
07/14/2021	237 SL	43						1	59	315.00		0.30	0.30		94.50		Review and analyze Minute Order regarding Hearing on Motion for Preliminary Approval.
07/14/2021	237 SL	43						1	60	315.00		0.20	0.20		63.00		Draft email to Norma regarding receipt for downloading Minute Order regarding Hearing on Motion for Preliminary Approval.
07/15/2021	237 SL	43						1	61	315.00		0.50	0.50		157.50		Create Teams file folders for Jennifer regarding Motion to Intervene and objections filed in Marko v. Doordash.
07/15/2021	237 SL	43						1	62	315.00		0.20	0.20		63.00		Draft email to Jennifer Haidar regarding settlement docs in Postmates and objections in Doordash.
07/16/2021	237 SL	43						1	63	315.00		0.20	0.20		63.00		Receive and review CLM email regarding new filings in Marko. Download Declaration Friedman in Support of Motion for Preliminary Approval, and Order Granting Motion for Preliminary Approval.
07/16/2021	237 SL	43						1	64	315.00		0.20	0.20		63.00		Review and analyze Declaration of Friedman in Support of Motion for Preliminary Approval
07/16/2021	237 SL	43						1	65	315.00		0.20	0.20		63.00		Review and analyze Order Granting Motion for Preliminary Approval.
07/16/2021	237 SL	43						1	66	315.00		0.20	0.20		63.00		Calendar deadlines per Order Granting Motion for Preliminary Approval.
07/16/2021	237 SL	43						1	67	315.00		0.20	0.20		63.00		Draft email to Norma regarding receipt for downloading Order Granting Motion for Preliminary Approval and Declaration of Friedman in Support of Motion for Preliminary Approval.
07/16/2021	237 SL	43						1	68	315.00		0.60	0.60		189.00		Review 7/12 Order Granting Motion for Preliminary Approval. Calendar additional deadlines per 7/12 Order Granting Motion for Preliminary Approval and CLM messages.
07/16/2021	237 SL	43						1	69	315.00		0.30	0.30		94.50		Review calendar invites from Jennifer Haidar. Email exchanges with Jennifer Haidar regarding calendar invite.
07/16/2021	237 SL	43						1	70	315.00		0.40	0.40		126.00		Upload entire case filings in folders created on Teams for Jennifer Haidar per CLM messages. Draft email to Jennifer Haidar regarding same.
07/16/2021	180 JMH	43 P						1	78	495.00		3.77	3.77		1,866.15		Call with CLM re strategy (.22), background research (.1), fee petition research (1.57), wrote fee petition outline and summary (1.88)
07/20/2021	180 JMH	43 P						1	79	495.00		7.49	7.49		3,707.55		Background research and wrote notes (1.8), strategy call with CLM (.2), detailed fee petition outline (4.7), review and edit fee petition with CLM then meeting re next steps (1.07)
07/21/2021	237 SL	43						1	71	315.00		0.20	0.20		63.00		Messages with Jennifer Haidar regarding Ntc of Mtn and Mtn for Atty Fee and Service Award in Marko v. Doordash.
07/21/2021	237 SL	43						1	72	315.00		0.50	0.50		157.50		Draft shell Ntc of Mtn and Mtn for Atty Fee and Service Award and Memorandum in Support thereof in Marko v. Doordash.
07/21/2021	237 SL	43						1	73	315.00		0.20	0.20		63.00		Draft email to Jennifer H re shell Ntc of Mtn and Mtn for Atty Fee and Service Award and Memorandum in Support thereof in Marko v. Doordash.
07/21/2021	180 JMH	43 P						1	80	495.00		1.08	1.08		534.60		Fee petition outline and research (1.08)
07/22/2021	180 JMH	43 P						1	81	495.00		10.00	10.00		4,950.00		Fee petition prep, improve outline, and create draft to submit for review
07/23/2021	180 JMH	43 P						1	82	495.00		0.50	0.50		247.50		Final edits fee petition
07/27/2021	180 JMH	43 P						1	83	495.00		0.35	0.35		173.25		Review background and conduct legal research on fee petitions (.35)
07/29/2021	180 JMH	43 P						1	84	495.00		0.87	0.87		430.65		Review CLM edits on fee petition & review case law (.87)
07/30/2021	180 JMH	43 P						1	85	495.00		6.20	6.20		3,069.00		Review CLM edits for fee petition and edited petition (6.2)
08/03/2021	237 SL	43						1	74	315.00		0.20	0.20		63.00		(Marko v. DoorDash) Check and review docket of Marko v. DoorDash for filing update. Cross-check deadlines on calendar.
08/06/2021	7 JGR	43						1	75	845.00		2.25	2.25		1,901.25		Marciano v. Doordash - Review and analyze draft motion for fees; review settlement papers; email to J Haidar.
08/10/2021	7 JGR	43						1	76	845.00		1.00	1.00		845.00		Marciano v. Doordash - review pleadings; conference with J Haidar regarding motion and reviewing docket.

Client: 1567.002C DoorDash Misclassification (Continued)

Date	Tmkr	Cat	Src	H P	T X	B C	R C	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Write-Up/ Down Hrs	Amount	Write-Up/ Down Amt	Description
08/11/2021	7 JGR	43						1	77	845.00		1.50	1.50		1,267.50		Marciano Doordash - work on fee petition research.
08/16/2021	237 SL	43						1	355	315.00		0.20	0.20		63.00		(Marciano v. DoorDash) Messages with Jennifer H regarding Opposition to motion for preliminary approval. Review docket for filing of objection on behalf of client Robinson.
08/18/2021	7 JGR	43						1	86	845.00		2.50	2.50		2,112.50		Work on attorneys fees motion.
08/19/2021	7 JGR	43						1	87	845.00		1.00	1.00		845.00		Review fact section and conference with J Haidar regarding motion.
08/23/2021	7 JGR	43						1	88	845.00		0.25	0.25		211.25		Check status of fee brief with J Haidar.
08/25/2021	7 JGR	43						1	89	845.00		0.75	0.75		633.75		Work on fee petition; calls with Flinn and conference with J Haidar.
08/26/2021	7 JGR	43						1	90	845.00		3.00	3.00		2,535.00		Review and revise motion for attorneys fees.
08/30/2021	7 JGR	43						1	91	845.00		2.00	2.00		1,690.00		Work on fee petition; conferences with R. Tack regarding same.
08/30/2021	237 SL	43						1	105	315.00		0.20	0.20		63.00		(Marko v. DoorDash) Receive and review Jennifer S email regarding draft letter to clients of Marko exclusions.
08/30/2021	237 SL	43						1	106	315.00		0.20	0.20		63.00		(Marko v. DoorDash) Review and analyze draft Letter to clients regarding Marko exclusion.
08/31/2021	7 JGR	43						1	92	845.00		1.75	1.75		1,478.75		Meeting regarding status of brief; review research from R. Tack.
09/02/2021	290 KMC	43						1	93	315.00		0.30	0.30		94.50		Call and email with JPH regarding assisting CA office with formatting fee petitions.
09/02/2021	290 KMC	43						1	94	315.00		0.40	0.40		126.00		Call and email with CLM regarding formatting of the draft fee petitions to send to co-counsel.
09/02/2021	290 KMC	43						1	95	315.00		3.50	3.50		1,102.50		Proofread, revise, and format the draft DoorDash fee petition documents.
09/02/2021	290 KMC	43						1	96	315.00		1.60	1.60		504.00		Troubleshoot generation of the TOC for the draft fee petition using styles.
09/02/2021	290 KMC	43						1	97	315.00		0.30	0.30		94.50		Confer with attorneys regarding revisions to the draft fee petition.
09/02/2021	290 KMC	43						1	98	315.00		0.70	0.70		220.50		Troubleshoot generation of the TOA for the draft fee petition memorandum.
09/03/2021	290 KMC	43						1	99	315.00		0.80	0.80		252.00		Attention to technical issues with generating the TOA in the draft petition brief; confer with staff regarding same.
09/03/2021	290 KMC	43						1	100	315.00		0.80	0.80		252.00		Conference call with WestLaw representative regarding draft assistant and generating the TOA for the draft fee petition.
09/03/2021	290 KMC	43						1	101	315.00		0.70	0.70		220.50		Confer with Westlaw representatives regarding drafting assistant and TOA issues; schedule call with representative regarding same.
09/03/2021	290 KMC	43						1	102	315.00		0.30	0.30		94.50		Call and correspondence with JGR regarding the most recent version of the fee petition draft.
09/03/2021	290 KMC	43						1	103	315.00		2.40	2.40		756.00		Prepare the TOA and TOC for the fee petition brief; revise, finalize, and circulate the initial draft to attorneys.
09/03/2021	7 JGR	43						1	104	845.00		2.00	2.00		1,690.00		Work on fee petition issues.
09/07/2021	237 SL	43						1	116	315.00		0.20	0.20		63.00		Call from Jennifer H regarding CLM email regarding Proceeding on 09/02/2021 (Hearing on Motion for Preliminary Approval of Settlement)
09/08/2021	237 SL	43						1	117	315.00		0.20	0.20		63.00		Check docket for upcoming hearing information.
09/08/2021	237 SL	43						1	118	315.00		0.20	0.20		63.00		(Marko v. DoorDash) Receive and review CLM email regarding notification of docket update. Call with Jennifer H regarding same.
09/08/2021	237 SL	43						1	119	315.00		0.20	0.20		63.00		(Marko v. DoorDash) Check LACourtConnect account for docket update in Marko v. DoorDash. Draft email to CLM regarding docket update and upcoming hearing.
09/13/2021	7 JGR	43						1	120	845.00		0.25	0.25		211.25		Review email from Liss Riordan and conference with Caleb.
09/17/2021	7 JGR	43						1	121	845.00		1.00	1.00		845.00		Call with S Liss Riordan; discuss fee issues with Caleb; email to Liss Riordan; review email regarding LaRonda Robinson claim as it relates to Marciano.
09/20/2021	7 JGR	43						1	122	845.00		0.50	0.50		422.50		Conference regarding fee petition.
09/20/2021	237 SL	43						1	356	315.00		0.20	0.20		63.00		Receive and analyze voice mail from client LaRonda Robinson.
09/20/2021	237 SL	43						1	357	315.00		0.20	0.20		63.00		Draft email to CLM regarding voice mail from client LaRonda Robinson.
09/20/2021	237 SL	43						1	358	315.00		0.20	0.20		63.00		Messages with Jennifer S regarding voice mail from client LaRonda Robinson.

Client: 1567.002C DoorDash Misclassification (Continued)

Date	Tmkr	Cat	Src	H P	T X	B C	R C	Tcode	Ref #	Rate	Units	Hours Worked	Hours to Bill	Write-Up/ Down Hrs	Amount	Write-Up/ Down Amt	Description
09/22/2021	7 JGR	43						1	359	845.00		0.50	0.50		422.50		Conference with Caleb and Shannon LR regarding fee motion.
09/22/2021	7 JGR	43						1	360	845.00		0.40	0.40		338.00		Follow up on fee petition issues and wip.
09/22/2021	169 CLM	43						1	362	720.00		8.00	8.00		5,760.00		Attend to details of final approval and draft and edit relevant pleadings.
09/23/2021	7 JGR	43						1	361	845.00		4.50	4.50		3,802.50		Address issues regarding fee petition and agreement regarding fees.
09/23/2021	169 CLM	43						1	363	720.00		8.00	8.00		5,760.00		(Marko v. DoorDash) Attend to details of final approval and draft and edit relevant pleadings.
09/24/2021	169 CLM	43						1	364	720.00		8.00	8.00		5,760.00		(Marko v. DoorDash) Attend to details of final approval and draft and edit relevant pleadings.
Total Billable Fees												271.76	271.76		144,320.45		
Billable Total:												46.60	46.60		38,767.00		7 J. Gordon Rudd, Jr.
Billable Total:												0.50	0.50		402.50		10 Hart L. Robinovitch
Billable Total:												1.20	1.20		558.00		166 Arielle M. Canepa
Billable Total:												69.60	69.60		47,753.00		169 Caleb L. Marker
Billable Total:												30.26	30.26		14,978.70		180 Jennifer M. Haidar
Billable Total:												2.25	2.25		708.75		218 Tina M. Olson
Billable Total:												0.90	0.90		283.50		235 Sabine A. King
Billable Total:												70.60	70.60		21,526.00		237 Josephine Lu
Billable Total:												35.25	35.25		14,100.00		241 Irene E. Schwieger
Billable Total:												11.80	11.80		3,717.00		290 Karen M. Colt
Billable Total:												2.80	2.80		1,526.00		609 Jennifer K. Sustacek
Expenses																	
01/30/2020	169 CLM		A					151	1						246.45		Lodging for Flinn Milligan King George San Francisco CA
08/16/2021	169 CLM							103	4						15.00		Conference Calls - 07/17/21 LA Court (BMO Mastercard)
Total Billable Expenses															261.45		
Advances																	
08/16/2021	169 CLM							94	2						3.00		Court Fee - 07/14/21 LA Superior Court (BMO Mastercard)
08/16/2021	169 CLM							94	3						11.20		Court Fee - 07/16/21 LA Superior Court (BMO Mastercard)
Total Billable Advances															14.20		

RECAP						
Fees:	144,320.45					
Expenses:	261.45	Previous Balance:	0.00			
Advances:	14.20	Payments/Credits:	0.00			
Total WIP:	144,596.10	Balance Due:	0.00	Total:	144,596.10	
A/R:	0-30	31-60	61-90	91-120	121-180	181+
	0.00	0.00	0.00	0.00	0.00	0.00

		Hours to Bill	Amount	
Total for Timekeeper 7	Billable	107.40	88,695.00	J. Gordon Rudd, Jr.
Total for Timekeeper 10	Billable	0.10	80.50	Hart L. Robinovitch
Total for Timekeeper 161	Billable	1.10	434.50	Flinn T. Milligan
Total for Timekeeper 166	Billable	0.10	49.50	Arielle M. Canepa
Total for Timekeeper 169	Billable	225.30	152,577.00	Caleb L. Marker
Total for Timekeeper 204	Billable	9.00	2,835.00	Barbara J. Doten
Total for Timekeeper 220	Billable	24.00	7,560.00	Leslie A. Harms
Total for Timekeeper 221	Billable	14.00	4,410.00	Kelly A. Bourette
Total for Timekeeper 222	Billable	4.00	1,600.00	Hrag A. Alexanian
Total for Timekeeper 223	Billable	21.50	5,697.50	Joshua Dominguez
Total for Timekeeper 227	Billable	27.80	8,607.50	Heidi S. Cuppy
Total for Timekeeper 233	Billable	10.50	3,307.50	Jennifer J. Galzki
Total for Timekeeper 237	Billable	24.90	7,245.50	Josephine Lu
Total for Timekeeper 241	Billable	172.80	69,120.00	Irene E. Schwieger
Total for Timekeeper 244	Billable	2.00	400.00	Erin D. Pesic
Total for Timekeeper 491	Billable	36.00	9,540.00	Derek Dixon
Total for Timekeeper 500	Billable	35.90	11,308.50	Amanda R. Klinger
Total for Timekeeper 509	Billable	24.20	7,623.00	Adam K. Hill
Total for Timekeeper 609	Billable	385.55	209,444.75	Jennifer K. Sustacek

GRAND TOTALS				
	Billable	1,126.15	590,535.75	