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12 *Attorneys For Plaintiffs And The Settlement Class*

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15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

16 **FOR THE COUNTY OF LOS ANGELES**

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

20 Plaintiffs,

v.

21 DOORDASH, INC.,

22 Defendant.
23
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26
27
28

Case No. BC659841

**DECLARATION OF MICHAEL J.
HASSEN IN SUPPORT OF MOTION
ATTORNEYS FEES AND COSTS**

Dept.: 7

Trial Date: None Set

Hon. Amy D. Hogue

1 I, Michael J. Hassen, declare as follows:

2 1. I am the President of Reallaw, APC. I am one of the attorneys for the plaintiffs in
3 this action. I am an attorney licensed to practice law in the State of California since 1986, the
4 District of Columbia since 2009, and the State of New York since 2015. I have been continuously
5 licensed in California since 1986, District of Columbia since 2009, and New York since 2015, and
6 am in good standing with the California State Bar, District of Columbia Bar, and New York State
7 Bar. I have litigated cases in both state and federal courts in California. I am also admitted in every
8 federal district in California, New York, and the District of Columbia, and have handled federal
9 litigation in the federal districts of California. I submit this declaration in support of Plaintiffs'
10 Motion for Attorneys' Fees and Costs. I have personal knowledge of the information set forth
11 herein.

12 **CLASS COUNSEL EXPERIENCE**

13 2. I am the President of Reallaw, APC, and worked on this matter in association with
14 Todd M. Friedman, co-lead counsel on this matter for Plaintiffs and the Class.

15 3. I have extensive experience defending and prosecuting class action lawsuits,
16 including cases related to labor law issues. During my 35-year career, I have been primary
17 counsel in more than 400 class actions, the substantial majority of which were labor law class
18 actions. While I have handled class actions across the United States, to the best of my recollection
19 all of my labor law class actions were litigated in California state and federal courts.

20 4. My experience in litigating class actions, and particularly employment law class
21 actions, has allowed me to provide valuable assistance to lead counsel's representation of the
22 Settlement Class. Looking only at cases where I represented the plaintiff in class action litigation,
23 my matters include, *inter alia*, the following cases: (i) *White v. Square, Inc.* (2019) 7 Cal.5th 1019
24 (reversing dismissal of class action and holding bankruptcy attorney had standing to challenge
25 Square's "no bankruptcy lawyer" policy as discriminatory); (ii) *Hoy v. Linebarger etc.*, San Diego
26 Superior Court Case No. 37-2017-00007840-CU-BT-NC (approving \$12 million settlement);
27 *Bassler v. Stephens Institute*, Case No. CGC-17-557866 (granting class certification and
28 appointing class counsel in contested hearing), (iv) *Burbank v. BMW of North America, LLC*,

1 U.S.D.C. N.J. Case No. 21-cv-01711-KM-ESK; (v) *Kermani v. Hyundai Motor America*, Los
2 Angeles Superior Court Case No. 21STCV24017, (vi) *S.C. v. Buddi US LLC*, U.S.D.C. C.D. Cal.
3 Case No. 8:19-cv-00146-JLS-KES.

4 5. My office maintains contemporaneous time records in its cases, and has done so in
5 this matter since associating with Mr. Friedman on August 20, 2019. My billing rate is \$1,085 per
6 hour in this case. To date, I have incurred 592.4 hours of attorney time for this case, with a total
7 lodestar of \$642,754.00. This figure does not include time estimated to participate in overseeing
8 settlement approval, preparing for and attending the final approval hearing, working on final
9 approval of the settlement, answering any additional questions from class members, overseeing
10 final administration and distribution, or any other additional or administrative tasks associated with
11 these issues. I anticipate that in addition to the hours described herein, I will expend an additional
12 20 hours working on this case through final distribution, which are *not* included in my hours
13 described above and below.

14 *LOTMF'S COSTS*

15 6. My firm has incurred litigation costs in this matter in the amount of \$150.74, to
16 date, and does not anticipate incurring any additional future costs through termination of this
17 litigation. These costs are comprised of costs for filing pleadings, copy charges and transportation
18 expenses. A summary of the costs my firm has incurred to date follows:

19

Court Filing Fees	\$ 57.70
Misc. Travel Expenses	\$ 93.04
Total	\$150.74

22

23 *REASONABLENESS OF HOURLY RATES*

24 7. My regular hourly rate is \$1,085 which is reasonable in respect to the ranges
25 charged by comparable law firms in the State of California with my level of experience and class
26 action expertise.

27 8. I graduated from the University of California at Berkeley, Boalt Hall School of
28 Law (now known as "Berkeley Law") Class of 1986 and was admitted to the State Bar of

1 California in December of that same year. Following my admission to the State Bar of California,
2 I served as a staff attorney for California Supreme Court Chief Justice Malcolm Lucas before
3 going into private practice and from there to large law firms, where my practice has primarily
4 focused on class action litigation at both the trial and appellate levels.

5 9. I have specialized in class action litigation for more than 30 years and I have served
6 as lead counsel or co-lead counsel in more than 400 class actions, the majority of which involved
7 labor law class actions, and at least 200 of these lawsuits were resolved on a class-wide basis.

8 10. I have spoken extensively at class action litigation seminars in California and New
9 York, and I have spoken at international class action seminars in Belgium and Italy.

10 11. Based on the Laffey Matrix, which has been submitted to the Court as an exhibit to
11 the declaration of Mr. Friedman, my requested hourly rate falls within the scope of reasonable
12 fees.

13 12. Further, I routinely work on cases with lawyers in New York who charge
14 substantially more than I do even though they have less experience in class action litigation. In
15 light of my experience and expertise, and in light of the fact that class action litigation is a
16 specialty, my regular hourly rate of \$1,085 is reasonable, as confirmed by the Laffey Matrix.

17 13. As noted above, I have spent 592.40 hours and anticipate that I will have spent
18 612.40 hours on this matter through final distribution. I am requesting a rate of \$1,085.

19 14. My firm maintained records of the time spent on this case. Attached as Exhibit A
20 is a true and correct copy of those time records.

21
22 I declare under the penalty of perjury of the laws of the State of California that the foregoing
23 is true and correct to the best of my knowledge.

24 Executed on September 27, 2021, at Walnut Creek, California.

25
26 /s/ Michael J. Hassen
27 Michael J. Hassen
28

MICHAEL J HASSEN

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Bill to:

Todd Friedman

TFriedman@toddfllaw.com

DoorDash 0182**INVOICE**

To September 24, 2021

Invoice Date September 24, 2021

Invoice Number 20934

Due Date Due Upon Receipt

Account Summary

Previous Balance	\$0.00
Payments Received	\$0.00
Outstanding Balance	\$0.00
Current Invoice	\$642,904.74

Total Due	\$642,904.74
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Payment Transactions

Date	Type	Invoice #	Description	Amount
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No payments have been made on this account.

Fee Detail

Date	Type	Description	Hours	Rate	Total
8/20/2019	MJH	Review emails and attachments from A. Bacon re mediation; strategy considerations re same; review email and attached news article from A. Bacon re DoorDash stealing tips.	5.40	\$1,085.00/hr	\$5,859.00
8/21/2019	MJH	Review email from co-counsel; review mediation documents and client documents for mediation.	3.20	\$1,085.00/hr	\$3,472.00

Date		Description	Hours	Rate	Total
8/22/2019	MJH	Further preparation for mediation; review client materials and documents produced by DoorDash.	8.10	\$1,085.00/hr	\$8,788.50
8/23/2019	MJH	Travel to/from mediation; attend mediation.	11.00	\$1,085.00/hr	\$11,935.00
8/24/2019	MJH	Strategy considerations re mediation issues; further legal analysis of claims against DoorDash re leverage for settlement.	8.50	\$1,085.00/hr	\$9,222.50
8/25/2019	MJH	Further strategy considerations re litigation and mediation issues and further legal analysis of issues related thereto.	5.80	\$1,085.00/hr	\$6,293.00
8/26/2019	MJH	Email to co-counsel re mediation issues; follow up on mediation issues; further computer research re litigation issues and settlement issues.	3.90	\$1,085.00/hr	\$4,231.50
8/27/2019	MJH	Telecon to co-counsel.	0.30	\$1,085.00/hr	\$325.50
8/28/2019	MJH	Review of litigation materials produced in discovery and of pleadings in present and related cases.	7.70	\$1,085.00/hr	\$8,354.50
8/29/2019	MJH	Further review of litigation materials produced in discovery and of pleadings in present and related cases.	8.60	\$1,085.00/hr	\$9,331.00
9/1/2019	MJH	Further review of pleadings and discovery in case.	7.00	\$1,085.00/hr	\$7,595.00
9/3/2019	MJH	Further review and analysis of discovery responses and pleadings; strategy considerations re trial issues.	7.50	\$1,085.00/hr	\$8,137.50
9/4/2019	MJH	Follow up on status of related cases; review pleadings re same; strategy considerations re settlement issues.	4.10	\$1,085.00/hr	\$4,448.50
9/5/2019	MJH	Telecon with co-counsel re next steps.	0.40	\$1,085.00/hr	\$434.00
9/6/2019	MJH	Strategy considerations re trial issues; extensive legal analysis of issues re same.	8.30	\$1,085.00/hr	\$9,005.50
9/7/2019	MJH	Strategy considerations re trial strategies and witness issues; extensive legal analysis of issues re same.	9.00	\$1,085.00/hr	\$9,765.00
9/8/2019	MJH	Further legal analysis of issues re merits of claims and trial thereon.	8.70	\$1,085.00/hr	\$9,439.50

Date		Description	Hours	Rate	Total
9/9/2019	MJH	Follow up telecon with co-counsel re status of work.	0.30	\$1,085.00/hr	\$325.50
9/10/2019	MJH	Follow up on pleading and discovery issues with co-counsel; further work on and legal analysis of mediation and trial issues.	5.50	\$1,085.00/hr	\$5,967.50
9/11/2019	MJH	Continue work on and legal analysis of mediation and trial issues.	5.80	\$1,085.00/hr	\$6,293.00
9/12/2019	MJH	Further review of client and DoorDash documents; additional work on and legal analysis of mediation and trial issues.	8.60	\$1,085.00/hr	\$9,331.00
9/16/2019	MJH	Further work on trial and mediation issues.	3.40	\$1,085.00/hr	\$3,689.00
9/17/2019	MJH	Strategy conference with co-counsel; follow up on related lawsuits and issues related thereto; legal analysis of issues raised in related cases.	7.70	\$1,085.00/hr	\$8,354.50
9/18/2019	MJH	Telecon with co-counsel re new status.	0.20	\$1,085.00/hr	\$217.00
9/20/2019	MJH	Telecon to counsel in related cases re factual support for claims against DoorDash.	1.10	\$1,085.00/hr	\$1,193.50
9/21/2019	MJH	Research class action settlements in related cases re strategy for settlement with DoorDash.	3.90	\$1,085.00/hr	\$4,231.50
9/22/2019	MJH	Further research class action settlements in related cases re strategy for settlement with DoorDash.	4.30	\$1,085.00/hr	\$4,665.50
9/23/2019	MJH	Telecon to co-counsel re new strategy ideas.	0.30	\$1,085.00/hr	\$325.50
9/26/2019	MJH	Telecon with co-counsel re status update.	0.20	\$1,085.00/hr	\$217.00
9/28/2019	MJH	Review and analysis of additional discovery and research materials.	5.00	\$1,085.00/hr	\$5,425.00
9/29/2019	MJH	Continued review and analysis of additional discovery and research materials.	3.80	\$1,085.00/hr	\$4,123.00
9/30/2019	MJH	Review court filing re stipulation; follow up on status of related case; strategy conference with counsel; further legal analysis of issues.	4.90	\$1,085.00/hr	\$5,316.50
10/18/2019	MJH	Email traffic with co-counsel.	0.20	\$1,085.00/hr	\$217.00
10/25/2019	MJH	Email traffic with A. Bacon.	0.30	\$1,085.00/hr	\$325.50

Date		Description	Hours	Rate	Total
10/26/2019	MJH	Telecon with A. Bacon re settlement and litigation strategy issues; legal analysis of issues raised in conference call.	7.70	\$1,085.00/hr	\$8,354.50
10/26/2019	MJH	Further strategy considerations and preliminary legal analysis of issues raised by A. Bacon during conference call.	6.50	\$1,085.00/hr	\$7,052.50
10/27/2019	MJH	Further legal analysis of issues raised during conference call with co-counsel.	7.20	\$1,085.00/hr	\$7,812.00
10/28/2019	MJH	Email traffic with co-counsel.	0.30	\$1,085.00/hr	\$325.50
10/29/2019	MJH	Legal analysis and strategy considerations re coordination issues; lengthy telecon with A. Bacon re coordination issues; begin drafting motion and memorandum in support thereof.	5.50	\$1,085.00/hr	\$5,967.50
10/30/2019	MJH	Further legal analysis of issues and further drafting of memorandum in support of motion to transfer and consolidate; email traffic with A. Bacon re same and re declaration and exhibit; review email traffic re ex parte and re final drafts of pleadings; review email traffic re settlement issues.	5.20	\$1,085.00/hr	\$5,642.00
10/31/2019	MJH	Review ex parte application to lift stay for limited purpose; strategy considerations and legal analysis of issues re same.	6.40	\$1,085.00/hr	\$6,944.00
11/1/2019	MJH	Review joint stipulation to continue CMC in companion case.	0.20	\$1,085.00/hr	\$217.00
11/18/2019	MJH	Email traffic with co-counsel.	0.20	\$1,085.00/hr	\$217.00
11/21/2019	MJH	Review motion for preliminary approval of class action settlement in companion cases; strategy considerations re ways to increase settlement value for class.	5.00	\$1,085.00/hr	\$5,425.00
11/22/2019	MJH	Telecon with co-counsel; extensive email traffic re related cases and computer research re same; review attachment from co-counsel re same.	1.50	\$1,085.00/hr	\$1,627.50
11/25/2019	MJH	Review materials from A. Bacon; email traffic re same; telecon to A. Bacon re settlement issues; telecon from T. Friedman re settlement issues.	2.60	\$1,085.00/hr	\$2,821.00
12/4/2019	MJH	Review opposition to motion for preliminary approval; strategy considerations re same.	2.30	\$1,085.00/hr	\$2,495.50

Date		Description	Hours	Rate	Total
12/5/2019	MJH	Email traffic with T. Friedman.	0.20	\$1,085.00/hr	\$217.00
12/5/2019	MJH	Email traffic with co-counsel.	0.30	\$1,085.00/hr	\$325.50
12/6/2019	MJH	Telecon with T. Friedman re objection and opt out; strategy considerations re same; review files re opposition to premature objection.	1.50	\$1,085.00/hr	\$1,627.50
12/10/2019	MJH	Telecon from T. Friedman; review ex parte papers; telecon with T. Friedman and co-counsel re response to ex parte; strategy considerations re same.	5.70	\$1,085.00/hr	\$6,184.50
12/11/2019	MJH	Review email traffic and draft opposition to ex parte application re motion to intervene/object; email to co-counsel re same; review filed papers; preparation for hearing on ex parte applications; legal analysis of issues re same.	4.50	\$1,085.00/hr	\$4,882.50
12/12/2019	MJH	Travel to/from San Francisco Superior Court hearing on ex parte; post-hearing conference with movants' counsel; telecon to T. Friedman re hearing and conference; review email traffic with co-counsel re settlement and preliminary approval issues.	4.10	\$1,085.00/hr	\$4,448.50
12/13/2019	MJH	Review new opposition to proposed class action settlement from objector; strategy considerations re same.	2.70	\$1,085.00/hr	\$2,929.50
12/16/2019	MJH	Review extensive email traffic re settlement issues; telecon with T. Friedman re same.	2.40	\$1,085.00/hr	\$2,604.00
12/17/2019	MJH	Review extensive email traffic re settlement issues; strategy considerations re same; extensive legal analysis of issues re same.	5.90	\$1,085.00/hr	\$6,401.50
12/18/2019	MJH	Review email traffic re settlement.	0.60	\$1,085.00/hr	\$651.00
12/19/2019	MJH	Review email traffic re settlement issues; review email from court re hearing date issues; telecon to counsel re same; legal analysis of issues requested.	6.20	\$1,085.00/hr	\$6,727.00
12/20/2019	MJH	Review court minutes continuing hearing dates; further strategy considerations re responses to intervention motions and objections; further legal analysis of issues re same.	24.00	\$1,085.00/hr	\$26,040.00

Date		Description	Hours	Rate	Total
12/23/2019	MJH	Review new motion for leave to intervene; strategy considerations re same.	1.20	\$1,085.00/hr	\$1,302.00
12/27/2019	MJH	Email traffic with T. Friedman re settlement issues; strategy considerations re same; review memorandum in support of intervention motion.	1.30	\$1,085.00/hr	\$1,410.50
12/30/2019	MJH	Follow up on status of discussions with counsel in other cases; follow up on meeting with DoorDash counsel.	3.90	\$1,085.00/hr	\$4,231.50
12/31/2019	MJH	Review motion to intervene and extensive email traffic re same; extensive legal analysis of issues re motion.	9.80	\$1,085.00/hr	\$10,633.00
12/31/2019	MJH	Review email traffic re resolution of objections; strategy considerations re same; telecon to DoorDash counsel; legal analysis of issues raised by counsel.	7.00	\$1,085.00/hr	\$7,595.00
1/2/2020	MJH	Email traffic with DoorDash counsel; follow up on status of settlement negotiations with other plaintiff counsel; review email from opposing counsel.	0.50	\$1,085.00/hr	\$542.50
1/3/2020	MJH	Review email traffic.	0.30	\$1,085.00/hr	\$325.50
1/3/2020	MJH	Email traffic re settlement issues; telecon with T. Friedman re same; review documents and legal analysis of issues re same.	6.40	\$1,085.00/hr	\$6,944.00
1/6/2020	MJH	Review motion to intervene and extensive email traffic re same; strategy considerations and extensive legal analysis of issues re same; review new CMC statement.	8.20	\$1,085.00/hr	\$8,897.00
1/7/2020	MJH	Review extensive email traffic re settlement issues; review motion to intervene; strategy considerations re same; review cases cited in motion; research re opposition to motion.	7.80	\$1,085.00/hr	\$8,463.00
1/9/2020	MJH	Review extensive email traffic re settlement issues; telecon re same.	0.40	\$1,085.00/hr	\$434.00
1/10/2020	MJH	Review consolidated opposition to motions to intervene; strategy considerations and preliminary legal analysis of issues re same.	4.50	\$1,085.00/hr	\$4,882.50
1/13/2020	MJH	Review new motion to intervene; strategy considerations re same; preliminary legal analysis of issues re motion to intervene.	6.90	\$1,085.00/hr	\$7,486.50

Date		Description	Hours	Rate	Total
1/15/2020	MJH	Review minute order continuing hearings.	0.20	\$1,085.00/hr	\$217.00
1/16/2020	MJH	Follow up on status of settlement negotiations; email traffic with T. Friedman re same.	0.60	\$1,085.00/hr	\$651.00
1/17/2020	MJH	Email traffic with T. Friedman re settlement issues; strategy considerations re stipulations in support of settlement; telecon from T. Friedman re stipulations and settlement strategies; review previous files re stipulations.	1.60	\$1,085.00/hr	\$1,736.00
1/17/2020	MJH	Email traffic among counsel re stipulations.	0.50	\$1,085.00/hr	\$542.50
1/18/2020	MJH	Telecon re stipulations.	0.30	\$1,085.00/hr	\$325.50
1/21/2020	MJH	Legal analysis of consolidation issues; strategy considerations re same; email traffic among counsel; telecon from counsel re same; review stipulations re consolidation.	6.40	\$1,085.00/hr	\$6,944.00
1/22/2020	MJH	Review email traffic and filings re motion for preliminary approval and re motion for leave to intervene; strategy considerations re same; draft shells re stipulation to consolidate cases.	6.80	\$1,085.00/hr	\$7,378.00
1/23/2020	MJH	Review new pleading re motion to intervene; strategy considerations re same.	3.30	\$1,085.00/hr	\$3,580.50
1/24/2020	MJH	Review email and motion by proposed intervenors; legal analysis of issues re same.	4.20	\$1,085.00/hr	\$4,557.00
1/29/2020	MJH	Review court order; review email traffic re court order.	0.40	\$1,085.00/hr	\$434.00
1/29/2020	MJH	Review order designating case as complex and vacating hearing; email traffic among counsel re same.	0.40	\$1,085.00/hr	\$434.00
1/30/2020	MJH	Review minutes vacating hearing dates of motions; review supplemental filings by objectors.	2.20	\$1,085.00/hr	\$2,387.00
1/31/2020	MJH	Review email traffic and attachments re settlement issues and objections thereto; strategy consideration re same and legal analysis of issues re same; review joint prosecution agreement	6.10	\$1,085.00/hr	\$6,618.50
2/11/2020	MJH	Review federal court order re opt out procedure; strategy considerations re same.	0.50	\$1,085.00/hr	\$542.50

Date		Description	Hours	Rate	Total
2/13/2020	MJH	Email traffic among counsel and review new scheduling order.	0.50	\$1,085.00/hr	\$542.50
2/14/2020	MJH	Review email traffic.	0.30	\$1,085.00/hr	\$325.50
2/14/2020	MJH	Review extensive email traffic and attachments among counsel re motion; strategy considerations re same.	4.10	\$1,085.00/hr	\$4,448.50
2/18/2020	MJH	Review email traffic re hearing dates; review court minutes re same.	0.40	\$1,085.00/hr	\$434.00
2/25/2020	MJH	Review email re upcoming hearing.	0.20	\$1,085.00/hr	\$217.00
2/27/2020	MJH	Review intervenor's motion to stay; strategy considerations and extensive legal analysis re same.	5.80	\$1,085.00/hr	\$6,293.00
2/28/2020	MJH	Review email traffic.	0.30	\$1,085.00/hr	\$325.50
3/3/2020	MJH	Review court order continuing hearing.	0.20	\$1,085.00/hr	\$217.00
3/4/2020	MJH	Review court order continuing additional hearings.	0.20	\$1,085.00/hr	\$217.00
3/15/2020	MJH	Extensive email traffic among counsel; strategy considerations re same.	0.70	\$1,085.00/hr	\$759.50
3/17/2020	MJH	Review extensive email traffic among counsel and court; review DoorDash opposition to motion to stay.	1.50	\$1,085.00/hr	\$1,627.50
3/26/2020	MJH	Review notice of withdrawal of motion to intervene; telecon to T. Friedman re status.	0.40	\$1,085.00/hr	\$434.00
4/13/2020	MJH	Review email traffic.	0.30	\$1,085.00/hr	\$325.50
4/14/2020	MJH	Review email traffic; review objections and related documents to motion for preliminary approval; extensive email traffic among counsel re same.	3.00	\$1,085.00/hr	\$3,255.00
4/24/2020	MJH	Review court orders on motion for preliminary approval and intervention; strategy considerations re same; email traffic with T. Friedman re same.	2.40	\$1,085.00/hr	\$2,604.00
4/29/2020	MJH	Review email traffic and attachments.	0.40	\$1,085.00/hr	\$434.00
4/30/2020	MJH	Review and respond to email traffic among plaintiff's counsel.	0.30	\$1,085.00/hr	\$325.50

Date		Description	Hours	Rate	Total
4/30/2020	MJH	Email traffic among counsel.	0.30	\$1,085.00/hr	\$325.50
5/11/2020	MJH	Extensive email traffic among counsel.	0.50	\$1,085.00/hr	\$542.50
5/11/2020	MJH	Review and respond to email from court; review email traffic from other counsel re same.	0.20	\$1,085.00/hr	\$217.00
5/15/2020	MJH	Extensive email traffic among counsel and court.	0.60	\$1,085.00/hr	\$651.00
5/15/2020	MJH	Review extensive email traffic re court hearing on pending motions.	0.30	\$1,085.00/hr	\$325.50
5/21/2020	MJH	Review email from opposing counsel.	0.20	\$1,085.00/hr	\$217.00
5/22/2020	MJH	Review email and supplemental brief by proposed intervenor; strategy considerations re same; email traffic with co-counsel re same; review notice from court re same; review email from proposed intervenor to court.	3.70	\$1,085.00/hr	\$4,014.50
6/1/2020	MJH	Review new filing by prospective intervenor; strategy considerations re same.	2.20	\$1,085.00/hr	\$2,387.00
6/2/2020	MJH	Review new filings by prospective intervenors; further strategy considerations re upcoming hearing.	0.50	\$1,085.00/hr	\$542.50
6/8/2020	MJH	Review extensive new filings.	3.60	\$1,085.00/hr	\$3,906.00
6/9/2020	MJH	Review minute order continuing hearing.	0.20	\$1,085.00/hr	\$217.00
6/16/2020	MJH	Review notice of appearance.	0.20	\$1,085.00/hr	\$217.00
6/17/2020	MJH	Review email traffic; review supplemental filing in opposition to motion for preliminary approval; strategy considerations re same.	3.30	\$1,085.00/hr	\$3,580.50
6/18/2020	MJH	Review email traffic and supplemental authorities re motion to intervene; strategy considerations re same.	1.70	\$1,085.00/hr	\$1,844.50
6/18/2020	MJH	Review email traffic with court and supplemental authority from proposed intervenors; strategy considerations re cases to be cited by proposed intervenors.	1.20	\$1,085.00/hr	\$1,302.00

Date		Description	Hours	Rate	Total
6/19/2020	MJH	Review extensive email traffic with court and among counsel; review court's tentative ruling re proposed settlement; strategy considerations re same; review follow up argument email/brief from opposing counsel; email to T. Friedman re same.	2.20	\$1,085.00/hr	\$2,387.00
6/19/2020	MJH	Review tentative ruling on motion for preliminary approval of class action settlement; review statement of recent decision; review extensive email traffic among counsel; review hearing transcript.	4.60	\$1,085.00/hr	\$4,991.00
6/22/2020	MJH	Review email from court; telecon to T. Friedman re hearing on motion to intervene issues.	0.30	\$1,085.00/hr	\$325.50
6/22/2020	MJH	Review email from court.	0.20	\$1,085.00/hr	\$217.00
6/23/2020	MJH	Email traffic among counsel; attend hearing on proposed motions for leave to intervene.	1.40	\$1,085.00/hr	\$1,519.00
6/26/2020	MJH	Review email traffic and attachments; telecon to T. Friedman.	0.40	\$1,085.00/hr	\$434.00
6/26/2020	MJH	Review proposed orders granting motion for preliminary approval and denying motion for leave to intervene; review email traffic re same.	1.00	\$1,085.00/hr	\$1,085.00
6/29/2020	MJH	Review email from court; review email and joint status report from co-counsel.	0.50	\$1,085.00/hr	\$542.50
6/30/2020	MJH	Review court order denying motions for leave to intervene; strategy considerations re same.	0.50	\$1,085.00/hr	\$542.50
7/10/2020	MJH	Review court minute order.	0.20	\$1,085.00/hr	\$217.00
7/24/2020	MJH	Review supplemental briefing re motion for preliminary approval.	0.50	\$1,085.00/hr	\$542.50
7/24/2020	MJH	Review withdrawal of intervention motion and objections; review supplemental briefing re class settlement.	2.90	\$1,085.00/hr	\$3,146.50
8/11/2020	MJH	Review new DoorDash declaration re preliminary approval.	0.50	\$1,085.00/hr	\$542.50
8/17/2020	MJH	Email traffic with T. Friedman.	0.30	\$1,085.00/hr	\$325.50

Date		Description	Hours	Rate	Total
8/17/2020	MJH	Research scope of settlement of related case; legal analysis of issues re same; email traffic with co-counsel re same.	6.10	\$1,085.00/hr	\$6,618.50
8/18/2020	MJH	Email traffic with T. Friedman re new filing.	0.40	\$1,085.00/hr	\$434.00
8/20/2020	MJH	Review new filing and extensive email traffic re same.	5.00	\$1,085.00/hr	\$5,425.00
8/21/2020	MJH	Further review request for judicial notice and attachments; strategy considerations and legal analysis of issues re same.	5.80	\$1,085.00/hr	\$6,293.00
9/1/2020	MJH	Review court order denying settlement without prejudice; strategy considerations re same; review extensive email traffic among counsel re same; follow up on order re intervention; email traffic with co-counsel re same.	11.50	\$1,085.00/hr	\$12,477.50
9/2/2020	MJH	Further review tentative ruling on motion for preliminary approval; extensive email traffic among counsel re same; review files for relevant materials for co-counsel.	8.70	\$1,085.00/hr	\$9,439.50
9/28/2020	MJH	Review joint status report; telecon with co-counsel.	0.40	\$1,085.00/hr	\$434.00
9/30/2020	MJH	Review joint stipulation.	0.20	\$1,085.00/hr	\$217.00
10/30/2020	MJH	Review email traffic.	0.30	\$1,085.00/hr	\$325.50
11/4/2020	MJH	Review new filings in support of motion for preliminary approval.	2.60	\$1,085.00/hr	\$2,821.00
11/5/2020	MJH	Review supplemental briefing re motion for preliminary approval; review email traffic.	2.00	\$1,085.00/hr	\$2,170.00
11/6/2020	MJH	Review email traffic; review article re Prop 22.	0.90	\$1,085.00/hr	\$976.50
11/17/2020	MJH	Review objections to settlement; extensive email traffic among counsel re same; preliminary legal analysis of response to objections.	3.00	\$1,085.00/hr	\$3,255.00
11/19/2020	MJH	Review email traffic.	0.30	\$1,085.00/hr	\$325.50
11/21/2020	MJH	Review email.	0.20	\$1,085.00/hr	\$217.00
11/23/2020	MJH	Review email traffic among counsel and with objector; review joint status report.	0.70	\$1,085.00/hr	\$759.50

Date		Description	Hours	Rate	Total
11/24/2020	MJH	Review email traffic and objection to opposition to motion for preliminary approval.	2.00	\$1,085.00/hr	\$2,170.00
12/1/2020	MJH	Review minute order.	0.20	\$1,085.00/hr	\$217.00
12/3/2020	MJH	Review email traffic.	0.30	\$1,085.00/hr	\$325.50
12/20/2020	MJH	Review extensive email traffic re motion to strike; legal analysis of issues; draft motion to strike.	6.70	\$1,085.00/hr	\$7,269.50
12/22/2020	MJH	Review email.	0.20	\$1,085.00/hr	\$217.00
12/23/2020	MJH	Review email traffic.	0.40	\$1,085.00/hr	\$434.00
12/29/2020	MJH	Review motion to intervene; email traffic and telecon with T. Friedman; telecon to opposing counsel; strategy considerations re same; preliminary legal analysis of intervention issues.	3.20	\$1,085.00/hr	\$3,472.00
12/30/2020	MJH	Review email traffic; legal analysis of intervention issues.	3.60	\$1,085.00/hr	\$3,906.00
12/31/2020	MJH	Review email traffic.	0.20	\$1,085.00/hr	\$217.00
1/4/2021	MJH	Review email traffic and attachments among counsel.	0.80	\$1,085.00/hr	\$868.00
1/5/2021	MJH	Review extensive email traffic and attachments among counsel; extensive legal analysis of issues re new motion re preliminary approval.	8.40	\$1,085.00/hr	\$9,114.00
1/6/2021	MJH	Review further extensive email traffic and attachments among counsel.	4.50	\$1,085.00/hr	\$4,882.50
1/7/2021	MJH	Review extensive email traffic among counsel; review notice of withdrawal of motion to intervene; review extensive supplemental filing in support of motion for preliminary approval; review amendment to settlement agreement.	5.90	\$1,085.00/hr	\$6,401.50
1/14/2021	MJH	Review email traffic; review court minute order re hearings.	0.40	\$1,085.00/hr	\$434.00
1/20/2021	MJH	Review email traffic; review court order setting hearing date.	0.50	\$1,085.00/hr	\$542.50

Date		Description	Hours	Rate	Total
1/22/2021	MJH	Review 100+ page new filing re preliminary approval of class action settlement; detailed strategy considerations re same.	9.30	\$1,085.00/hr	\$10,090.50
1/25/2021	MJH	Review new filings re objections to preliminary approval motion; strategy considerations re same.	2.40	\$1,085.00/hr	\$2,604.00
2/2/2021	MJH	Review new motion for leave to intervene; strategy considerations re same; telecon with co-counsel re same.	3.00	\$1,085.00/hr	\$3,255.00
2/3/2021	MJH	Review objections to motion for preliminary approval; review email traffic among counsel re same and review draft opposition brief.	2.80	\$1,085.00/hr	\$3,038.00
2/8/2021	MJH	Review ex parte application for OST re motion for leave to intervene; strategy considerations re same.	1.10	\$1,085.00/hr	\$1,193.50
2/10/2021	MJH	Review email traffic among counsel.	0.30	\$1,085.00/hr	\$325.50
2/16/2021	MJH	Review opposition to ex parte motion.	0.50	\$1,085.00/hr	\$542.50
2/17/2021	MJH	Review email traffic; review notice from court hearing hearing on intervention motion; review request to continue hearing in related case.	0.60	\$1,085.00/hr	\$651.00
2/22/2021	MJH	Review minute order.	0.20	\$1,085.00/hr	\$217.00
2/24/2021	MJH	Review email and tentative ruling on preliminary approval motion from court; strategy considerations re same; legal analysis of issues re same.	3.40	\$1,085.00/hr	\$3,689.00
3/3/2021	MJH	Review email traffic.	0.20	\$1,085.00/hr	\$217.00
3/4/2021	MJH	Review email traffic; review notice from court continuing hearing date.	0.50	\$1,085.00/hr	\$542.50
3/25/2021	MJH	Review extensive opposition to motion to intervene; strategy considerations and legal analysis of issues re oral argument thereon.	7.40	\$1,085.00/hr	\$8,029.00
3/26/2021	MJH	Review email traffic and extensive new motion for preliminary approval of class certification papers; strategy considerations and legal analysis of issues re oral argument thereon.	6.70	\$1,085.00/hr	\$7,269.50

Date		Description	Hours	Rate	Total
4/1/2021	MJH	Review reply brief and supplemental request for judicial notice in support of motion for leave to intervene; strategy considerations re same.	2.30	\$1,085.00/hr	\$2,495.50
4/5/2021	MJH	Strategy conference with co-counsel re withdrawal of filing.	0.30	\$1,085.00/hr	\$325.50
4/6/2021	MJH	Review notice of withdrawal of filing.	0.20	\$1,085.00/hr	\$217.00
4/13/2021	MJH	Email and text message traffic with T. Friedman; review new draft motion and court checklist; email to co-counsel re same.	3.30	\$1,085.00/hr	\$3,580.50
4/14/2021	MJH	Review draft of new motion for preliminary approval; review court checklist; email to co-counsel re proposed changes.	4.50	\$1,085.00/hr	\$4,882.50
4/16/2021	MJH	Review new preliminary approval papers.	3.00	\$1,085.00/hr	\$3,255.00
4/19/2021	MJH	Review new filings re motion for preliminary approval.	0.50	\$1,085.00/hr	\$542.50
4/22/2021	MJH	Review new motion for preliminary approval; telecon with co-counsel re same.	0.80	\$1,085.00/hr	\$868.00
4/27/2021	MJH	Review stipulation and order.	0.20	\$1,085.00/hr	\$217.00
4/29/2021	MJH	Review minute order.	0.20	\$1,085.00/hr	\$217.00
5/24/2021	MJH	Review extensive email traffic and attachments re tentative ruling on motion for preliminary approval of class action settlement; strategy considerations re same; legal analysis of issues re same.	5.10	\$1,085.00/hr	\$5,533.50
6/17/2021	MJH	Review email and extensive attachments re filing re preliminary approval of class action settlement; further strategy considerations and legal analysis of issues re oral argument thereon.	7.60	\$1,085.00/hr	\$8,246.00
6/18/2021	MJH	Review filed copies of extensive motion for preliminary approval.	2.50	\$1,085.00/hr	\$2,712.50
7/6/2021	MJH	Review email and extensive supplemental briefing re preliminary approval of class action settlement; telecon with co-counsel re same.	2.80	\$1,085.00/hr	\$3,038.00
7/9/2021	MJH	Review notice of appearance.	0.20	\$1,085.00/hr	\$217.00

Date		Description	Hours	Rate	Total
7/11/2021	MJH	Review email and declaration in support of preliminary approval; strategy considerations and analysis re same.	4.70	\$1,085.00/hr	\$5,099.50
7/12/2021	MJH	Review email traffic and attachments among counsel; legal analysis of issues re same; review minute order; review new filing.	4.40	\$1,085.00/hr	\$4,774.00
7/13/2021	MJH	Review email traffic and attachments re order granting preliminary approval of class action settlement.	2.80	\$1,085.00/hr	\$3,038.00
7/21/2021	MJH	Follow up on court deadlines; telecon with counsel re settlement issues.	1.90	\$1,085.00/hr	\$2,061.50
9/24/2021	MJH	Email traffic with co-counsel; preparation of declaration in support of fee application.	2.70	\$1,085.00/hr	\$2,929.50
			Hours Total	592.40	Fee Total
					\$642,754.00

Expense Detail

Date		Description	Quantity	Rate	Total
8/23/2019	MJH	Travel to/from mediation in Oakland, including parking.	0	\$0.00	\$46.04
12/19/2019	MJH	Travel to/from ex parte hearing at San Francisco Superior Court; bridge toll and parking charge.	0	\$0.00	\$47.00
12/14/2020	KWK	File and serve express charge for Objection to Milos Antic Opposition to Mtn for Preliminary Approval Court Fees	1	\$57.70	\$57.70
				Expenses Total	\$150.74

Fees	\$642,754.00
Expense	\$150.74
Current Due	\$642,904.74
Outstanding Balance	\$0.00
Total Due	\$642,904.74

Timekeeper Summary

Timekeeper	Hours
Michael J Hassen	592.40
Total Hours	592.40

DoorDash 0182
Todd Friedman

Due Date	Due Upon Receipt
Invoice #	20934
Total Due	\$642,904.74
Amount Paid	<div>\$.</div>

Make payment to:

MICHAEL J HASSEN
Reallaw, APC
The Atrium on Broadway
1981 N. Broadway, Suite 280
Walnut Creek, CA 94596
