

1 LAW OFFICES OF TODD M. FRIEDMAN, P.C.

2 TODD M. FRIEDMAN, SBN 216752

(tfriedman@toddfllaw.com)

3 ADRIAN R. BACON, SBN 280332

(abacon@toddfllaw.com)

4 21550 Oxnard Street, Suite 780

Woodland Hills, CA 91367

5 Telephone: 877.206.4741

6 Facsimile: 866.633.0228

7 SHANNON LISS-RIORDAN (SBN 310719)

(sliss@llrlaw.com)

8 ANNE KRAMER (SBN 315131)

(akramer@llrlaw.com)

9 LICHTEN & LISS-RIORDAN, P.C.

10 729 Boylston Street, Suite 2000

Boston, MA 02116

11 Telephone: (617) 994-5800

12 Facsimile: (617) 994-5801

13 *Attorneys for Plaintiffs and the Settlement Class*

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

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

20 Plaintiffs,

v.

21 DOORDASH, INC.,

22 Defendant.

Case No. BC659841

DECLARATION OF TODD FRIEDMAN
IN SUPPORT OF MOTION FOR
ATTORNEYS' FEES AND COSTS

Dept.: 7

Trial Date: None Set

Hon. Amy D. Hogue

Hearing Date: November 30, 2021

Hearing Time: 9:30 am

1 I, Todd Friedman, declare as follows:

2 1. I am the managing partner of The Law Offices of Todd M. Friedman, P.C. I am
3 one of the attorneys for the plaintiffs in this action. I am an attorney licensed to practice law in
4 the State of California since 2001, the State of Illinois since 2002, and the State of Pennsylvania
5 since 2011. I have been continuously licensed in California since 2001, Illinois since 2002, and
6 Pennsylvania since 2011, and am in good standing with the California State Bar, Illinois State
7 Bar, and Pennsylvania State Bar. I have litigated cases in both state and federal courts in
8 California and Illinois. I am also admitted in every federal district in California and have
9 handled federal litigation in the federal districts of California. I submit this declaration in
10 support of Plaintiffs' Motion for Attorneys' Fees and Costs. I have personal knowledge of the
11 information set forth herein.
12

13 **FACTUAL BACKGROUND**

14 2. This action was commenced on May 2, 2017 when Plaintiff Daniel Marko filed a
15 Class Action Complaint against DoorDash, alleging misclassification and numerous violations
16 of the Labor Code and the California Unfair Competition Law Cal. Bus. & Prof. Code §§ 17200
17 *et seq.* ("UCL") on behalf of himself and a proposed class consisting of all DoorDash delivery
18 drivers in California. Marko subsequently amended the complaint in August 2017 to add
19 PAGA claims and an additional named plaintiff, Jesus Corona. DoorDash filed a Motion to
20 Compel arbitration, which the parties extensively briefed and argued. Ultimately, Judge
21 Highberger enforced DoorDash's arbitration agreement, compelling the Plaintiffs to
22 individually arbitrate their claims for independent contractor misclassification and damages and
23 deferring consideration of the Plaintiffs' request for public injunctive relief. See Marko v.
24 DoorDash (LA Sup. Ct. May 29, 2018) BC659841.

25 3. Meanwhile, other plaintiffs in Marciano II v. DoorDash (San Francisco Super.
26 Ct.) CGC-18-567869, and Magana v. DoorDash (N.D. Cal.) No. 4:18-cv-03395, litigated
27 similar issues and also had their claims compelled to arbitration. With Lichten & Liss-Riordan
28 PC, which represents the plaintiffs in Marciano II and Magana, we negotiated a settlement of

1 claims related to independent contractor misclassification against DoorDash for the relevant
2 period, which at the time ran from August 30, 2016 to February 29, 2020. We agreed to file our
3 request for preliminary approval in the Marciano II case in San Francisco Superior Court, and
4 the papers were filed in November 2019.

5
6 4. Ultimately, a class settlement was reached in the Marciano II case, which was
7 filed in San Francisco Superior Court on November 21, 2019. The court (Judge Andrew Y.S.
8 Cheng) issued a series of orders requesting supplemental briefing in April, June, and August
9 2020, which led to further mediation and a revised settlement, which was filed on November 4,
10 2020. Following a further order from the court, which expressed concern about the settlement
11 of class (non-PAGA) claims in a case that had only asserted PAGA claims, the parties returned
12 to mediation for a third time, on March 18, 2021, with mediator Francis J. “Tripper” Ortman,
13 who has extensive experience mediating these types of independent contractor cases under
14 California law. Following that mediation, the parties reached a further revised settlement in this
15 case for a total sum of \$100 million, \$12.5 million of which will be allocated to settle the PAGA
16 claims. The settlement has been joined by all the plaintiffs described above.

17 **THE SETTLEMENT**

18 5. The settlement agreement provides that Defendant will pay a Gross Settlement
19 Fund of one hundred million dollars (\$100,000,000) to resolve the Released Claims.

20 6. The Net Settlement Fund will be calculated by deducting the following amounts
21 from the Gross Settlement fund: 1) attorneys’ fees of up to twenty-eight percent (28%) of the
22 Gross Settlement Fund (i.e. \$28,000,000); 3) Service Awards of up ten thousand dollars
23 (\$10,000) to each of the named plaintiffs; 4) 75% of the \$12.5 million allocated to settle the
24 PAGA claim, or nine million three hundred seventy-five thousand (\$9,375,000) to the
25 California Labor & Workforce Development Agency (“LWDA”); and 5) one million three
26 hundred thousand (\$1,300,000) to the Claims Administrator for necessarily incurred
27 administrative costs.
28

1 7. The settlement agreement provides in pertinent part that Class Members' shares
2 of the Net Settlement Fund will be calculated *pro rata* based on the number of miles driven
3 making deliveries for DoorDash during the settlement class period. Any check issued will
4 remain valid and negotiable for one hundred and eighty (180) days from the date of issuance,
5 after which it will be cancelled and the funds redistributed to participating Class Members
6 whose share would be greater than \$20, subject to the same terms. The Settlement
7 Administrator will issue a 1099 to any settlement class member whose share exceeds the \$600
8 threshold for tax reporting. Any funds left over after issuance of the second round of checks
9 will be transmitted to the Workers' Rights Clinic of Legal Aid at Work or Greater Boston Legal
10 Services. Payments to the Workers' Rights Clinic of Legal Aid at Work will be made out of
11 residual funds from the California Settlement Class members and payments to Greater Boston
12 Legal Services will be made out of residual funds from the Massachusetts Settlement Class
13 members. Both organizations fulfill the purpose of the lawsuit by providing legal advocacy for
14 low-wage workers seeking to enforce their rights under the California Labor Code and
15 Massachusetts Wage Act respectively.

16
17 8. In return for the monetary consideration, settlement class members will release
18 all claims stemming from DoorDash's alleged misclassification of its drivers as independent
19 contractors rather than employees. The settlement explicitly does not release claims for
20 retaliation, discrimination, wrongful termination, and individual claims filed with the
21 appropriate agency for the recovery of workers' compensation benefits.¹

22
23 ¹ The agreement includes a release of unknown claims under CCP § 1542, which means
24 that even if there are claims that Class Members do not know about right now, but which fall
25 under the type of claims being released in this settlement (i.e. claims related to independent
26 contractor misclassification), such unknown claims are still covered by the release. This
27 provision has been included because DoorDash needs certainty; indeed, any time a defendant
28 settles a class action, they are effectively buying global peace. That will not be the case if class
members could simply claim that they were unaware of the existence of certain claims related to
independent contractor misclassification during the settlement class period. Other courts have
approved the inclusion of this language in class action settlements, including in the prior
Marciano I settlement. See, e.g., Marciano I, Case No. CGC-15-548101, Settlement Agreement
(*cont'd*)

1 9. My office along with my co-counsel have overseen the settlement notice and
2 administration process. The class notice was disseminated, and a number of measures have
3 been taken to ensure that the notice reaches the maximum number of Class Members, and
4 results in a high participation rate. This includes sending supplemental reminder notices via
5 email and text messages. As a result of these measures, the Notice has been successful so far at
6 driving claims. The Class Notice process and results will be further described in a report of the
7 Administrator before the Final Approval Hearing.
8

9 10. Additionally, I have received hundreds of calls and emails from Class Members
10 inquiring about the settlement and wanting to discuss the terms with me personally as one of the
11 lead Class Counsel. I have undertaken the responsibility of personally communicating with
12 such Class Members. I would estimate that I have spoken with approximately two hundred
13 Class Members since the Class Notice was sent out. The response of Class Members has been
14 overwhelmingly positive, with the vast majority of them expressing gratitude for our work on
15 the case and being pleased with the result.

16 11. Given the risks in this case, the valuation performed by my office and our co-
17 counsel, the arms-length negotiations entered into by the parties, the high participation rate, the
18 responses of the Class Members, and the fact that there have been only two *pro se* objections to
19 date to the settlement, as well as the fact that the settlement was informed by our extensive class
20 action experience, I strongly believe that this settlement is fair and reasonable and should be
21 approved.
22
23
24
25

26 _____
27 at ¶ 9.5 (“With respect to the Settlement Class Members’ Released Claims, ... each Settlement
28 Class Member... shall be deemed to have expressly, knowingly, and voluntarily waived and
relinquished, to the fullest extent permitted by law, the provisions, rights, and benefits he or she
may otherwise have had pursuant to Section 1542 of the California Civil Code ...”); Cotter v.
Lyft, Inc. (N.D. Cal. 2016) Civ. A. No. 3:13-cv-04065-VC, Dkt. 169-1 at ¶¶ 67-68 (same)

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

13. Any incentive payment awarded to the Representative Plaintiffs, any attorneys' fees and costs awarded to Class Counsel and certain expenses including Claims Administration Costs, are to be paid from the Settlement Fund by Defendant. The net settlement figures, as well as the risk and damages analysis are set forth in the declaration of Shannon Liss-Riordan, which both myself and my partner Adrian Bacon have reviewed, participated in, and agree with.

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

15. The Law Offices of Todd M. Friedman, P.C. seeks final approval as Class Counsel in this Action. I am informed and believe that Class Counsel are qualified and able to conduct this litigation as a class action.]As one of the main plaintiff litigators of consumer rights cases in Southern of California, I have been requested to and have made regular presentations to community organizations regarding debt collection laws and consumer rights.

22
23
24
25
26
27
28

1 17. Therefore, my experience in litigating class actions and my years in practice
2 allow me to provide outstanding representation to the Settlement Class. I will continue to strive
3 to fairly, responsibly, vigorously and adequately represent the putative class members in this
4 action.

5 18. The Law Offices of Todd M. Friedman has served as plaintiff's counsel in at
6 least the following class actions where a settlement was reached on a class-wide basis and has
7 achieved over \$300,000,000 in class-wide relief for consumers and employees.

- 8
- 9 a. *Dancer v. L.A. Times*, BC472154 (L.A. Superior Court) (common fund class-
10 wide settlement of \$3 million to \$4 million; final approval granted);
- 11 b. *Couser v. Comenity Bank*, 3:12-cv-02484-MMA-BGS (S.D. Cal.) (\$8.475
12 million class-wide settlement achieved; final approval granted);
- 13 c. *Stemple v. QC Financial Services Group of California, Inc.*, 3:12-cv-01997-
14 CAB-WVG (S.D. Cal.) (certified class achieved by motion, and subsequent class-
15 wide settlement of \$1.5 million achieved; final approval granted);
- 16 d. *Couser v. Apria Healthcare, Inc.* 8:13-cv-00035-JVS-RNB (C.D. Cal.) (common
17 fund class-wide settlement of \$400,000 to \$750,000; final approval granted);
- 18 e. *Abdeljalil v. General Electric Capital Corporation*, 12-CV-02078-IEG-RBB
19 (S.D. Cal.) (class-wide settlement with common fund of \$6.125 million achieved;
20 final approval granted);
- 21 f. *Fox v. Asset Acceptance*, 3:13-CV-00922-DMS-BGS (S.D. Cal.) (common fund
22 of \$1 million in class-wide relief achieved; final approval granted);
- 23 g. *Friedman v. LAC Basketball Club, Inc.*, 2:13-cv-00818-CBM-AN (C.D. Cal.)
24 (class-wide settlement achieved; final approval granted);
- 25 h. *Gerich et al. v. Chase Bank USA et al.* Case No 1:12-cv-5510 (N.D. Ill.) (class-
26 wide settlement of \$34 million; final approval granted);
- 27 i. *Than Zaw v Nelnet, Inc.*, Penal Code § 632 class – (Achieved class-wide
28 settlement of \$1,188,110; final approval granted);

- 1 j. *Medeiros v HSBC*, (common fund settlement of \$4.5 million - \$6.5 million
2 achieved; final approval granted);
- 3 k. *Ann Fox v. Spectrum Club Holding Company et al.*, Case No. 2:14-CV-06766-
4 PSG-FFMx (class-wide settlement; final approval granted);
- 5 l. *Sayan Aboudi v. T-Mobile USA, Inc.*, Case No. 3:12-cv-02169-BTM-NLS (class-
6 wide settlement in TCPA case, with common fund of \$2.5 million to \$5 million
7 and average per class member payment of \$500; final approval granted);
- 8 m. *Andrew Roseman v. BGASC, LLC, et al.*, Case No. EDCV 15-1100-VAP (SPx)
9 (C.D. Cal.) (class-wide relief achieved; final approval granted);
- 10 n. *Everado Gonzalez v The Scotts Company*, Case No. BC577875, Consolidated
11 with Case No: BC570350 (LASC) (class-wide settlement of \$925,000 in wage
12 and hour class action on behalf of approximately 603 employees achieved; final
13 approval granted);
- 14 o. *Payton v Luxe Valet*, Case No. BC588462 (LASC) (\$2.4 million class-wide
15 settlement on behalf of 1,800 employees misclassified as independent contractor;
16 final approval granted);
- 17 p. *Shelby v Two Jinn, Inc.*, Case No. 2:15-cv-03794-AB-GJS (C.D. Cal.) (EFTA
18 class action involving no cognizable actual damages, with company net worth of
19 \$25 million, settled for non-reversionary common fund of \$457,000, despite
20 liability under 15 U.S. Code § 1693m(a) likely being only \$250,000; zero
21 objections; final approval granted);
- 22 q. *Couser v Dish One Satellite*, Case No. 5:15-cv-02218-CBM-DTB (C.D. Cal.)
23 (TCPA class action; final approval granted);
- 24 r. *Couser v Dish One Satellite*, Case No. RIC 1603185 (Riverside S.C.) (Penal Code
25 632 class action; final approval granted);
- 26
27
28

- 1 s. *De La Paz v Accurate Courier NCA LLC*, Case No. 16CV00555 (Santa Cruz
2 County Superior Court) (PAGA and Labor Code class action; final approval
3 granted);
- 4 t. *Ross v Zurixx LLC*, Case No. 34-2016-00190874 (Sacramento SC) (UCL, FAL
5 and CLRA class action alleging false advertising for real estate educational
6 courses, non-reversionary common fund settlement for over \$600 per class
7 member; final approval granted);
- 8 u. *Eubank v Terminix International, Inc.*, Case No. 3:15-cv-00145-WQH-JMA
9 (PAGA settlement reached in wage and hour action on behalf of pest control
10 technicians; final approval granted);
- 11 v. *Holland v Tenet Healthcare Corporation*, Case No. 15CVP0226 (Superior Court
12 of San Luis Obispo County) (PAGA settlement reached in wage and hour action
13 on behalf of nurses; final approval granted);
- 14 w. *Jonathan Weisberg, v. HD Supply, Inc.*, Case No. 15-cv-08248-FMO (MRWx)
15 (class-wide settlement in TCPA class action, settled for \$1.225 million; final
16 approval granted);
- 17 x. *Miler v Pacific Auto Wash Partners*, Case No. 30-2015-00813013-CU-OE-CXC
18 (wage and hour class action; final approval granted);
- 19 y. *Sonia Barrientos v Law Office of Jeffrey H. Jordan*, Case No. 2:15-cv-06282-
20 JAK-GJS (FDCPA/RFDCPA letter class action, settled on class wide basis; final
21 approval granted);
- 22 z. *Tahmasian v Midway Rent A Car*, Case No. 30-2015-00813013-CU-OE-CXC
23 (LASC) (PAGA and Labor Code class action; final approval granted);
- 24 aa. *Craig Cunningham v Lexington Law Firm*, Case No. 1:17-cv-00087-EJF (N.D.
25 UT) (TCPA class action MDL involving solicitation prerecorded voice calls
26 made by a third party, vicarious liability alleged; final approval granted).
27
28

- 1 bb. *Sheena Raffin v Medicredit, Inc.*, et al., Case No. 2:15-cv-04912-MWF-PJW (C.D.
2 Cal.) (Cal. Penal Code § 632.7 class action certified by Hon. George H. King Ret
3 under Rule 23(b)(2) and (b)(3) by contested motion on behalf of 11,000 class
4 members whose calls were recorded without knowledge or consent, settled for \$5
5 million; final approval granted);
6
7 cc. *Fernandez v Reliance Home Services, Inc. Case No. BC607572 Los Angeles*
8 *Superior Court* (wage and hour plus PAGA class action; final approval granted);
9
10 dd. *Anne Wolf v Hewlett Packard Company*, Case No. 5:15-cv-01221-TJH-GJS (C.D.
11 Cal.) (CLRA class action certified by contested motion on behalf of tens of
12 thousands of consumers who purchased printer that was falsely advertised to
13 include Smart Install feature, settled on a wider multi-state, multi-product basis;
14 final approval granted);
15
16 ee. *Jaylinda Girardot et al v. Bail Hotline Bail Bonds, Inc.*, Case No. BC700131 Los
17 Angeles County Superior Court (wage and hour plus PAGA class action; final
18 approval granted);
19
20 ff. *Ryoo Dental, Inc. v OCO Biomedical, Inc.*, Case No. 8:16-cv-01626-DOC-KES
21 (TCPA fax blast class action, settled on class-wide basis; final approval granted);
22
23 gg. *Wondra Curtis v The Anthem Companies, Inc.*, Case No. 8:16-cv-01654-DOC-
24 JCG (wage and hour class action for off the clock work, settled on class-wide
25 basis; final approval granted);
26
27 hh. *Weinberg v Clariant, Inc. Case No. 56-2017-00494914-CU-NP-VTA Ventura*
28 *County Superior Court* (Rosenthal Fair Debt Collection Practices Act class action
settled on behalf of 1,830 class members for privacy infringements through clear
envelope debt collection letters; final approval granted);
ii. *Aliav v Sunset Eats, LLC*, Case No. BC655401 Los Angeles Superior Court (false
advertising class action on behalf of approximately 10,000 consumers, settled on
class-wide basis; final approval granted);

- 1 jj. *Alfred Zaklit, et al. v. Nationstar Mortgage LLC*, Case No. 5:15-cv-02190-CAS-
2 KK (C.D. Cal.) (Cal. Penal Code § 632.7 class action certified by contested
3 motion under Rule 23(b)(2) and (b)(3) on behalf of over 40,000 class members
4 whose calls were recorded without knowledge or consent; final approval
5 granted);
6 kk. *Mark Silva v. Olson and Co. Steel, Case No. 17CV001045* (Contra Costa County
7 Superior Court) (wage and hour class action settled on behalf of 563 class
8 members, final approval granted);
9 ll. *Manopla v. Home Depot USA, Inc.* Case No. 15-1120 (D. N.J.) (TCPA class
10 action; final approval granted);
11 mm. *Cawthorne v Rush Truck Centers of California, Inc.* Case No. 5:17-cv-01541-
12 JGB-SP (wage and hour class action on behalf of 560 employees; final approval
13 granted);
14 nn. *Lizama v Medical Data Systems, Inc.* Case No. 34-2017-00210986-CU-NP-GDS
15 (Sacramento County Superior Court) (Penal Code 632.7 class action alleging
16 illegal call recording, settled for \$2.2 million on behalf of over 30,000 consumers,
17 final approval granted);
18 oo. *Romano v SCI, Inc.* Case No. 2:17-cv-03537-ODW-JEM (wage and hour class
19 action for independent contractor misclassification, settled for \$2.5 million on
20 behalf of 230 employees, final approval granted);
21 pp. *Edward Makaron v. Enagic USA, Inc., Case No. 2:15-cv-05145-DDP-E* (C.D.
22 Cal.) (TCPA class action certified on behalf of approximately 2,000,000 class
23 members under Rule 23(b)(2) and 23(b)(3), subsequently settled on a Rule
24 23(b)(2) and 23(b)(3) basis, final approval granted);
25 qq. *Walsh v Fry's Electronics, Inc.* Case No. MSC18-01681 (Contra Costa County
26 Superior Court) (Gift Card Act, CLRA, UCL, FAL class action settled for class-
27 wide public injunctive relief; final approval granted);
28

- 1 rr. *In RE HP Firmware Update Litigation*, Case No. 5:16-cv-05820-EJD (N.D. Cal.)
2 (co-lead class counsel in consolidated Unfair Competition class action alleging
3 HP pushed a firmware update on consumers' printers that blocked their ability to
4 use third party ink cartridges, preliminary approval granted; final approval
5 granted);
6
7 ss. *Nishimoto v T&S Business Corporation*, Case No. 34-2017-00211426
8 (Sacramento County Superior Court) (wage and hour and PAGA class action on
9 behalf of janitorial workers; final approval granted);
10
11 tt. *Rodriguez v. Experian Information Solutions, Inc. et. al.* Case No. 2:15-cv-
12 01224-RAJ (W.D. Wash.) (FCRA class action for improper credit pulls; certified
13 under Rule 23 by contested motion, and settled on class-wide basis, final approval
14 granted);
15
16 uu. *Ahmed v HSBC Bank USA*, Case No. 5:15-cv-02057-FMO (SPx) (C.D. Cal.)
17 (TCPA class; final approval granted);
18
19 vv. *Garcia et. al. v. HMS Host, Inc.*, Case Jo. 17-cv-03069-RS (N.D. Cal.) (wage and
20 hour class action, final approval granted);
21
22 ww. *Aiken v. Malcolm Cisneros, A Law Corporation*, Case No. 5:17-cv-02462-JLS-
23 SP (C.D. Cal.) (Fair Debt Collection Practices Act class action, settled on class
24 wide basis, preliminary approval granted);
25
26 xx. *Bonilla, et al. v. Windsor Fashion, LLC*, Case No. CIVDS1723088 (wage and
27 hour class action settled on behalf of over 5,000 employees, final approval
28 granted);
yy. *Medina v. Enhanced Recovery Company, LLC*, Case No. 2:15-cv-14342-
JEM/MAYNARD (S.D. Fla.) (TCPA class settlement common fund of \$1.45M,
final approval granted);
zz. *Pena v. John C Heath Attorney at Law, PLLC*, Case No. 1:18-cv-24407-UU (S.D.
FL.) (consolidated TCPA class action, final approval granted);

- 1 aaa. *Griffey v. TA Operating, LLC*, Case No. CIVDS1907259 (San Bernardino County
2 Superior Court) (PAGA settlement \$390,000; final approval granted);
- 3 bbb. *D'Angelo Santana v. Rady Children's Hospital*, Case No. 37-2014-00022411-
4 CU-MT-CTL (San Diego County Superior Court) (Confidentiality of Medical
5 Information Act, Cal. Civ. Code § 56, *et seq.* class settlement; final approval
6 granted);
- 7 ccc. *Chavis v. Three Group, Inc.*, Case No. 18STCV08737 (Los Angeles County
8 Superior Court) (wage and hour PAGA settlement on behalf of dancers alleging
9 contractor misclassification; final approval granted);
- 10 ddd. *Fabricant v. AmeriSave Mortgage Corporation*, Case No. 2:19-cv-04659-AB-AS
11 (C.D. Cal.) (\$6.25 million common fund TCPA class action settlement, final
12 approval granted);
- 13 eee. *El Nasleh v. California Spaghetti Restaurants, Inc.*, Case No. CIVDS1812587
14 (San Bernardino County Superior Court) (consolidated wage and hour class
15 action settlement on behalf of restaurant employees settled for \$1.5M,
16 preliminary approval granted);
- 17 fff. *Nizam v. Phiadon International USA, Inc.*, Case No. CGC-20-582322 (San
18 Francisco Superior Court) (wage and hour misclassification class action
19 settlement, preliminary approval pending);
- 20 ggg. *Martinez v. Mattucini Plumbing, Inc.*, Case No. 18TRCV00133 (Los Angeles
21 Superior Court) (wage and hour class action settlement on behalf of plumbers,
22 preliminary approval pending);
- 23 hhh. *Western Dental Wage and Hour Cases*, JCCP No. 5079 (County of Sacramento)
24 (consolidated JCCP wage and hour class action settlement, LOTMF acted as lead
25 liaison counsel on behalf of dental employees, preliminary approval pending);
- 26
27
28

- 1 iii. *Cohen v. Coca-Cola Refreshments, USA, Inc.*, Case No. 2:19-cv-04083-JAK
2 (PLAx) (C.D. Cal.) (wage and hour class action settlement on behalf of trucking
3 employees, final approval pending);
- 4 jjj. *Barron v Paragon Building Maintenance, Inc.*, Case No. BC713754 (Los
5 Angeles Superior Court) (wage and hour class action settlement on behalf of
6 janitorial employees, final approval granted);
- 7 kkk. *Randolph v. Amazon.com LLC et. al*, Case No. 37-2017-00011078-CU-OE-CTL
8 (San Diego County Superior Court) (wage and hour class action settlement on
9 behalf of delivery drivers, preliminary approval granted final approval granted);
- 10 lll. *Barnett v Trigram Education Partners, LLC*, Case No. ESX-L-006106-20 (N.J.
11 Superior Court county of Essex) (wage and hour class action settlement on behalf
12 of university employees, preliminary approval pending);
- 13 mmm. *Dilworth v Hong Holdings, LLC* Case No. 19STCV24101 (Los Angeles Superior
14 Court) (consolidated wage and hour class action settlement on behalf of gas
15 station employees, preliminary approval pending);
- 16 nnn. *Winters v Two Towns Ciderhouse, Inc.* Case No. 20-cv-00468-BAS-BGS (S.D.
17 Cal.) (nationwide false advertising class action settlement on behalf of consumers
18 who purchased mislabeled products, preliminary approval granted, final approval
19 granted);
- 20 ooo. *Vaccaro v Delta Drugs II, Inc.*, Case No. 20STCV28871 (Los Angeles Superior
21 Court) (CIPA class action settlement on behalf of consumers, preliminary
22 approval pending);
- 23 ppp. *Vaccaro v Super Care, Inc.*, Case No. 20STCV03833 (Los Angeles Superior
24 Court) (CIPA class action settlement on behalf of over 50,000 consumers,
25 preliminary approval pending);
- 26
27
28

- 1 qqq. *Mansour v. Bumble, Inc.*, Case No. RIC1810011 (Riverside Superior Court)
2 (Largest Unruh Act class settlement in the history of statute, \$70M in classwide
3 benefits on behalf of 2 million consumers; preliminary approval granted);
4 rrr. *Caldera v. American Medical Collection Association*, (C.D. Cal.) Case No. 2:16-
5 cv-00381-CBM-AJW (TCPA class action certified by contested motion, settled
6 on classwide basis out of bankruptcy proceeding, preliminary approval granted);
7 sss. *Hale v. Mana Pro Products, LLC*, Case No. 2:18-cv-00209-KJM-DB (E.D. Cal.)
8 (false advertising class action, final approval granted); and
9 ttt. *Aleksanian, et al. v. Enrich Financial, Inc.*, Case No. BC698829 (Los Angeles
10 County Superior Court) (certified class by contested motion under Credit Repair
11 Organization Act, California Credit Services Act and Federal Credit Repair
12 Organization Act, preliminary approval pending).

13
14 19. In addition, my firm also certified the following cases as class actions by
15 contested motion and was appointed class counsel:

- 16 a. *Anne Wolf v. Hewlett Packard Company*, Case No. 5:15-cv-01221-TJH-GJS
17 (C.D. Cal.) (class action certified by contested motion on behalf of tens of
18 thousands of class members who purchased printer that was falsely advertised
19 to include Smart Install feature);
20 b. *Caldera v. American Medical Collection Association*, Case No. 2:16-cv-
21 00381-CBM-AJW (C.D. Cal.) (TCPA class action certified by contested
22 motion);
23 c. *Alfred Zaklit, et al. v. Nationstar Mortgage LLC*, Case No. 5:15-cv-02190-
24 CAS-KK (C.D. Cal.) Cal. Penal Code § 632.7 class action certified under
25 Rule 23(b)(2) and (b)(3) on behalf of class members whose calls were
26 recorded without knowledge or consent);
27 d. *D'Angelo Santana v. Rady Children's Hospital*, Case No. 37-2014-00022411-
28 CU-MT-CTL (San Diego County Superior Court) (Confidentiality of Medical

Information Act, Cal. Civ. Code § 56, *et seq.*);

- e. *Edward Makaron v. Enagic USA, Inc.*, Case No. 2:15-cv-05145-DDP-E (C.D. Cal.) (TCPA class action certified on behalf of approximately 2,000,000 class members under Rule 23(b)(2) and 23(b)(3));
- f. *Rodriguez v. Experian Information Solutions, Inc., et al.*, Case No. 2:15-cv-01224-RAJ (W.D. Wash.) (FCRA class action for improper credit pulls; certified under Rule 23);
- g. *Sheena Raffin v. Medcredit, Inc., et al.*, Case No. 2:15-cv-04912-MWF-PJW (C.D. Cal.) (Cal. Penal Code § 632.7 class action certified by Hon. George H. King Ret. under Rule 23(b)(2) and (b)(3) on behalf of class members whose calls were recorded without knowledge or consent);
- h. *Stemple v. QC Financial Services Group of California, Inc.*, Case No. 3:12-cv-01997-CAB-WVG (S.D. Cal.) (certified class achieved by motion, and subsequent class-wide settlement);
- i. *Abdeljalil v. General Electric Capital Corporation*, Case No. 12-CV-02078-IEG-RBB (S.D. Cal.) (certified class achieved by motion, and subsequent class-wide settlement);
- j. *Aleksanian, et al. v. Enrich Financial, Inc.*, Case No. BC698829 (Los Angeles County Superior Court) (certified class under Credit Repair Organization Act, California Credit Services Act and Federal Credit Repair Organization Act);
- k. *McCurley v Royal Seas Cruises, Inc.*, Case No. 17-cv-986 BAS (AGS) (one of, if not the first TCPA class actions certified by contested motion on a contested manufactured consent theory, certified on behalf of over 2 million consumers).

20. Approximately one third of our settled class action cases involved wage and hour and PAGA claims, and many of these actions involved independent contractor misclassification claims. For instance, in the *Romano* action, my office heavily litigated through motions to

1 dismiss, summary judgment, and four contested class certification motions, before finally
2 settling on highly favorable terms.

3 21. My partner Adrian Bacon, who worked extensively on this litigation as well, has
4 has been licensed to practice since 2011 and has worked as a plaintiffs' side class action
5 litigation attorney for the duration of his career. Prior to receiving his law license, he worked
6 for the Federal Trade Commission, and was involved in several "sweeps" including one dubbed
7 Operation Shortchange, where the FTC shut down a series of scammers who were taking
8 advantage of consumers during the financial downturn and achieved a multi-nine figure
9 judgment against them which made headlines. He also worked on and participated in a federal
10 raid, referred to as an "Immediate Access" and thereafter a receivership against a scam boiler
11 room posing as part of the Obamacare plan by selling fake medical discount cards to vulnerable
12 sick people during the last economic downturn. The company was bilking people out of their
13 last savings by selling them substitutes for medical insurance through bogus discount cards that
14 were not recognized or accepted anywhere that they were advertised. He was part of the team
15 that shut down their operations in Tempe Arizona along with a team of agents and federal
16 marshals.

17
18 22. Once licensed to practice, he began by working at Strange & Carpenter as an
19 associate on consumer protection class actions, including heading up the document production
20 team on the Toyota Unintended Acceleration Litigation. While there, he drafted and worked on
21 several published opinions, including a Ninth Circuit decision *Corvello v. Wells Fargo* and the
22 now heavily-cited opinion *Nguyen v. Barnes & Noble* denying a motion to compel arbitration,
23 which was upheld by the Ninth Circuit.

24 23. Mr. Bacon left the firm and went to work at Marlin & Saltzman in their Orange
25 County office under Louis M. Marlin, a highly decorated retired class action attorney, and now
26 respected mediator. Marlin & Saltzman is a class action litigation firm that specializes in wage
27 and hour class actions. He worked there for two years and was appointed class counsel on
28 several wage and hour class actions. He was instrumental in favorably settling one such class

1 action against Ikea for more than twice what the company came to mediation willing to pay,
2 which is cited below.

3 24. In 2014 he lateralled over to The Law Offices of Todd M. Friedman, where he
4 has served as the head of litigation at the office for the past seven years. He was made a partner
5 in 2018 after having certified and settled numerous class actions for clients of our firm and
6 helped revamp our litigation department. Almost every single one of the class actions that our
7 firm has settled, certified or otherwise litigated in earnest on behalf of our clients out of our
8 California office have been cases that he has overseen with me.

9 25. Mr. Bacon has argued multiple class action cases before the Ninth Circuit,
10 Eleventh Circuit, Second Circuit, and California Supreme Court, including *Gallion v United*
11 *States*, 772 Fed.Appx. 604 (9th Cir. July 8, 2019), *Smith v. LoanMe, Inc.*, 11 Cal.5th 183 (Cal.
12 S.Ct. 2021), and *Soliman v. Subway Franchisee Advertising Fund Trust, Ltd.*, 999 F.3d 828
13 (2nd Cir. 2021). He has assisted in briefing on two United States Supreme Court cases, and
14 been the primary author of Amicus briefs to the US. Supreme Court, as well as multiple
15 comments to federal regulators including the FCC for advancement of consumer privacy rights.

16 26. In addition to our firm's experience, Mr. Bacon has separately been approved as
17 class counsel at his prior firm on several wage and hour class action matters, including the
18 following:

- 19 a. *Miller v. Ikea California, LLC* , Case No.: 30-2009 00331682, California Superior
20 Court County of Orange (\$5.75M class settlement granted final approval);
21 b. *David Paiva et al v. Denny Corporation et al.*, Case No. 37-2010-00103831-CU-
22 OE-CTL, California Superior Court County of San Diego (granted final
23 approval); and
24 c. *Juan Martinez et al v. Valley Pride, Inc. et al.*, Case No. M108688, California
25 Superior Court County of Monterey (granted final approval).

26 27. It is this level of experience for both myself and Mr. Bacon that enabled the firm
27 to undertake the instant matter and to successfully combat the resources of the Defendant and
28

1 their capable and experienced counsel. On account of the concerted and dedicated effort this
2 case demanded in order to properly handle and prosecute, my office and our co-counsel were
3 precluded from taking other cases, and in fact, had to turn away other potential fee generating
4 cases.

5 28. I will also mention that between myself, Mr. Bacon, our associates, and other
6 members of my office have collectively spoken with over 300 Class Members throughout this
7 litigation. We conducted extensive research into the merits and damages issues for Class
8 Members, including thousands of pages of documentation, dozens if not hundreds of recordings
9 and videos, records relating to the merits of the claims that revealed both strengths and
10 weaknesses, as well as hearing stories of Dashers first-hand as to their experiences and
11 grievances for purposes of securing witness and client declarations as evidence. We conducted
12 legal research into every possible legal claim asserted in the case, including into merits, class
13 certification, arbitration, and damages issues. We also conducted extensive research into
14 valuation of similar claims in comparable cases that were granted final approval. We were very
15 well-equipped to evaluate the claims in this case, and had all of the necessary discovery to
16 assess whether a settlement was fair and reasonable to Class Members. I do not believe that
17 further discovery would have revealed anything whatsoever of which we were not already
18 aware. I believe the same can be said of the efforts of our lead-co-counsel's office, who was
19 equally informed on these issues.
20

21 **LOTMF'S HOURS AND RATES**

22 29. This action was originally commenced on May 2, 2017 against Defendant, by
23 filing a representative complaint asserting causes of action under the California Labor Code.

24 30. This action, required Class Counsel to spend time on this litigation that could
25 have been spent on other matters. At various times during the litigation of this class action, this
26 lawsuit has consumed my time as well as my firm's resources. My firm has not been paid
27 anything for our work on this case since it was filed. It is my opinion that law firms in such a
28 position expect to receive a multiplier in cases such as these because of the risk taken, the extent

1 to which firms are unable to take on other cases, the delay in getting paid and the costs we have
2 to advance.

3 31. Law Offices of Todd M. Friedman, P.C. has maintained contemporaneous time
4 records since the commencement of this action. To date, we, along with our cocounsel Michael
5 Hassen will have incurred approximately 4,846.2 hours of attorney time for this case, with a
6 total lodestar of \$3,757,626.50, by the time final disbursement and administration is closed.
7 This figure includes the estimated hours that will be incurred overseeing settlement approval,
8 preparing for and attending the final approval hearing, working on final approval of the
9 settlement, answering any additional questions from class members, overseeing final
10 administration and distribution and any and all additional administrative tasks associated with
11 these issues. I anticipate my firm will expend 500 hours working on this matters through final
12 distribution, which are included in our hours described above and below. My billing rate is
13 \$900 per hour in this case, the billing rate for Adrian R. Bacon is \$750 per hour, the billing rate
14 for our junior associates is \$425 per hour, mid level associates is \$475 per hour, senior
15 associates is \$650 per hour, paralegals is \$225 per hour, and law clerks is \$250 per hour.
16

17 *LOTMF'S COSTS*

18 32. My firm has incurred litigation costs in this matter in the amount of \$14,805.82,
19 to date, and anticipates an additional approximately \$1,000 in future costs through termination of
20 this litigation, including filing expenses, Case Anywhere fees, courtcall fees, and other
21 miscellaneous expenses. These costs are comprised of costs for filing and serving the
22 complaint, transmitting copies of filings to the Honorable Court via courier service, payment of
23 mediation fees, airfare, mileage and transportation expenses. Should my firm incur costs
24 through final approval of this action, Plaintiff will seek reimbursement of such costs. Here is a
25 summary of the costs my firm has incurred to date, plus additional anticipated costs, which will
26 be comprised of service and filing fees, mileage/transportation expenses attending both
27 hearings, and parking. These do not include the costs of Michael Hassen, who incurred
28 additional minor expenses.

Filing Fees	\$7.50
Service Fees	
Rapid Legal Filing and Service Fees	\$5,371.00
Case Anywhere Fees	\$966.00
Courtcall Fees	\$564.00
Misc Travel Expenses	\$372.03
Transportation	\$112.25
Airfare	\$1,083.84
Hotel	\$553.20
Mediation	\$5,000.00
Appeal Fees	\$775.00
Future Anticipated	\$1,000
Total	\$15,805.82

REASONABLENESS OF HOURLY RATES

33. Law Offices of Todd M. Friedman, P.C.'s hourly rates are reasonable in respect to the ranges charged by comparable law firms in the State of California.² My billing rate is \$900 per hour in this case, the billing rate for Mr. Bacon is \$750 per hour, the billing rate for junior associates is \$425 per hour, mid level associates is \$475 per hour, senior associates is \$650 per hour, paralegals is \$225 per hour, and law clerks is \$250 per hour.

34. Regarding my rate, I have been practicing law since 2001, and am the managing partner of one of the most active consumer protection and employment law firms in California. I have been counsel of record on hundreds of class action lawsuits, dozens of which have

² See Laffey Matrix attached hereto as Exhibit A.

1 resolved on a class-wide basis. In the past four years alone, my firm has been counsel on cases
2 totaling over \$300 million in class-wide relief for consumers. Based on the Laffey Matrix, the
3 requested hourly rate falls within the scope of reasonable fees.

4 35. Mr. Bacon is a Partner at The Law Offices of Todd M. Friedman, P.C. and the
5 lead litigation attorney at the firm. He has practiced almost exclusively as a plaintiffs' class
6 action attorney for the duration of his career as a litigator, which has included both wage and
7 hour and consumer class actions. He oversees all the firm's class actions and act in either a lead
8 or co-lead role in nearly all of them. His experience is further set forth above.

9 36. In light of this experience and the customary rates on the Laffey Matrix, a \$900
10 hourly rate of is warranted for me, and \$750 is warranted for Mr. Bacon.

11 37. Mr. Wolowitsch was a law school graduate and clerk at my firm during his time
12 working on this matter, but then was hired as a junior associate after he passed the bar exam.
13 He assisted in numerous tasks throughout the litigation, interviewing dashers, and contributed
14 towards the results achieved for the class by taking care of the day to day oversight of the
15 peladings, speaking to clients, conducting legal research, and other tasks. In light of his
16 experience, an hourly rate of \$250 for his time as a law clerk, and \$425 for his time as an
17 associate is warranted, and is further warranted in light of customary rates for associates on the
18 Laffey Matrix.

19 38. Mr. Hanohov was a junior associate at the time the case was originally being
20 investigated and filed. He assisted in numerous tasks throughout the litigation, including
21 assisting with early drafts of the complaint, speaking to clients, interviewing dashers,
22 conducting legal research, and other tasks. In light of his experience, an hourly rate of \$425 is
23 warranted, and is further warranted in light of customary rates for associates on the Laffey
24 Matrix.

25 39. Ms. Kuberka was a junior associate during her time working on this matter. She
26 assisted in numerous tasks throughout the litigation, and contributed towards the results
27 achieved for the class by taking care of the day to day oversight of the peladings, speaking to
28

1 clients, interviewing dashers, conducting legal research, and other tasks. In light of his
2 experience, an hourly rate of \$250 for his time as a law clerk, and \$425 for his time as an
3 associate is warranted, and is further warranted in light of customary rates for associates on the
4 Laffey Matrix.

5 40. Mr. Wolowitsch was a law school graduate and clerk at my firm during his time
6 working on this matter, but then was hired as a junior associate after he passed the bar exam.
7 He assisted in numerous tasks throughout the litigation, and contributed towards the results
8 achieved for the class by taking care of the day to day oversight of the peladings, speaking to
9 clients, conducting legal research, and other tasks. In light of his experience, an hourly rate of
10 \$250 for his time as a law clerk, and \$425 for his time as an associate is warranted, and is
11 further warranted in light of customary rates for associates on the Laffey Matrix.
12

13 41. I anticipate my firm will incur an additional 400 hours for preparing for and
14 appearing at the final approval hearing, communicating with Class Members, communicating
15 with opt out counsel, defending the settlement from any possible objectors, and overseeing the
16 settlement administration through final distribution.

17 42. I understand that my co-counsel Michael Hassen estimates he will have spent
18 592.4 hours on this matter through final distribution, and is requesting a rate of \$1,085.

19 43. With regard to a bare bones' loadstar amount, our current billing records, along
20 excluding those of Mr. Hassen, reflect approximately 3,753.8 hours with an estimated additional
21 500 hours of work from my firm split between myself and Mr. Bacon, finalizing final approval,
22 responding to class members, including any opt outs of objectors, and overseeing distribution
23 and final accounting for the Class, for a total of 4,253.8 hours of time. Based on these rates, and
24 our time entries for each corresponding individual (Excluding Michael Hassen), the loadstar
25 estimate is \$3,114,872.50. If Mr. Hassen's time and lodestar are included, the total number of
26 hours is 4,846.2 and lodestar is \$3,757,626.50. Here is a breakdown and summary of the fees
27 incurred in connection with this Case, including our co-counsel Mr. Hassen:
28

Name/Position	Rate	Hours	Lodestar
Todd M. Friedman (Partner)	\$900	1,137.6	\$1,023,840.00
Adrian R. Bacon (Partner)	\$750	2,413.8	\$1,810,350.00
Meghan George (Senior Associate)	\$650	8.7	\$5,655.00
Thomas Wheeler (Mid-Level Associate)	\$475	92.1	\$43,747.50
Yoel Hanohov (Junior Associate)	\$425	306.0	\$130,050.00
Kelsey Kuberka (Junior Associate)	\$425	128.2	\$54,485.00
Mordechai Wolowitsch (Junior Associate/Law Clerk)	\$425/250	99.3	\$31,422.50
Erika Campany (Paralegal)	\$225	5.3	\$1,192.50
Lauren Walker (Paralegal)	\$225	13.2	\$2,970.00
Nadia Lotun (Paralegal)	\$225	11.7	\$2,632.50
Michael Hassen (Co-Counsel Partner)	\$1,085	592.4	\$642,754.00
TOTAL		4,846.2	\$3,757,626.50

44. My office maintained records of the time spent on this case. Attached as Exhibit B is a true and correct copy of our time sheets.

45. Based on the foregoing, as well as the contemporaneous declarations and filings, I submit that Plaintiff's Counsels' collective request for an award of \$28,000,000 is reasonable. Thus, under either the percentage of the fund method or the lodestar method, the amount requested is reasonable.

46. I also would submit that in light of the fact that Plaintiffs took an active role in the investigation and litigation of this case, that Plaintiffs should be awarded an incentive award of \$10,000 each. Plaintiffs Marko and Corona both were ideal clients, providing us information about their experiences, documentation, connecting us with other Dashers who were witnesses, who themselves provided additional information and documentation, and also flying to San

1 Francisco to attend the first mediation in this matter in person to represent the Class Members.
2 They communicated with us by phone and email and text on hundreds of occasions. \$10,000
3 for the effort they put in is in my opinion modest because they did far more than most Class
4 Representatives I have ever been retained by in cases of this nature. I believe the incentive
5 award sought is reasonable and fair under the circumstances.
6

7 47. The proposed awards of attorneys' fees and costs are well within the range of
8 reasonableness and warrant this Court's approval. This is especially so in view of Plaintiff's
9 attorneys' efforts and risks in pursuing this case, and the results achieved (i.e., obtaining a
10 favorable class-wide resolution in the face of a highly uncertain, and ever-evolving, legal
11 landscape as to core issues in this case, and as to arbitration risks), as well as the fact that this is
12 a historic settlement on behalf of gig economy workers. Fee awards of one-third of the
13 maximum Settlement Fund have been consistently approved as reasonable based on my
14 experience in class action matters, and we are collectively requesting less than that amount.
15

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

18 Executed on September 27, 2021, at Woodland Hills, California.

19
20 By: 

21 Todd Friedman
22
23
24
25
26
27
28

EXHIBIT A

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

LAFFEY MATRIX

History

Case Law

See the Matrix

Contact us

Home

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., DL v. District of Columbia, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* "Years Out of Law School" is calculated from June 1 of each year, when most law students graduate. "1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). "4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier "1-3" from June 1, 1996 until May 31, 1999, would move into tier "4-7" on June 1, 1999, and tier "8-10" on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

EXHIBIT B

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Marko, Daniel et. al. v Doordash, Inc.
The Law Offices of Todd M. Friedman, P.C.
TIME ENTRIES

Todd M. Friedman, Esq. – Managing Partner

Rate: \$900/hr

Date	Task	Hours
10/5/2016	discuss new potential case with Adrian Bacon	0.5
10/5/2016	email to firm regarding findings, initiate new potential investigation of case	0.3
10/6/2016	discuss campaign for potential client outreach with Adrian Bacon	0.5
10/7/2016	initiate campaign for client outreach	1
10/14/2016	client outreach	1
2/15/2017	discuss client outreach program results with Adrian; review progress	1
4/1/2017	emails with Yoel Hanohov re new case	0.5
4/1/2017	call with adrian bacon re new case theory	0.5
4/1/2017	open new case file in system, create amicus task list, assign projects for filing, draft retainer agreement, and otherwise calendar deadlines and open file	2.5
4/17/2017	emails with firm re case status	0.5
4/21/2017	emails with client	0.1
4/22/2017	emails with client	0.1
4/23/2017	emails with client	0.1
4/28/2017	Discuss case with Adrian Bacon, including case theories and possible venue	1
5/1/2017	final review of draft paga notice and class action complaint	2
5/1/2017	call with Adrian Bacon re case status	0.5
5/17/2017	review case file; discuss with Yoel and Adrian	1
6/9/2017	call with Adrian Bacon re overlapping settlement	1
6/30/2017	review initial case management order;	0.6
6/30/2017	case file review check on status of filings and discuss with adrian bacon	1.2
7/17/2021	discuss case with adrian bacon; review CMC statement and case file	1.5
7/26/2017	call with Adrian Bacon re strategy and case assignments	0.8
8/15/2017	review Doordash press release; discuss case status with Adrian; and impact of settlement	0.3
8/25/2017	call with Adrian Bacon	0.5
8/31/2017	draft counsel declaration in support of objection motion	2.5
9/1/2017	discuss status of brief with Adrian Bacon	0.5

9/2/2017	finalize declarations of clients; phone calls with all three clients	2
9/2/2017	review additional legal research; further discussions with Yoel Hanohov re further modifications to draft	3.5
9/3/2017	further revisions to draft of brief	5.5
9/4/2017	call with Adrian Bacon	0.5
9/4/2017	further revisions to draft of brief and declarations and supporting evidence	4
9/4/2017	discuss status with Yoel Hanohov	0.3
9/5/2017	final review of draft brief, assist in assembling final product for filing	3
9/12/2017	review reply brief of Marciano re objection; discussion with Yoel and Adrian	3.7
9/13/2017	debrief of hearing with Adrian and Yoel	1
9/16/2017	discussion with Yoel and Adrian re case strategy	0.2
9/20/2017	periodic case file review; check calendar and deadlines; ensure things on track	1
9/26/2017	call with Adrian Bacon re case status	0.8
9/26/2017	review motion to compel; case file review	2
10/1/2017	review draft motion to compel opposition; discussion with Adrian	2
10/2/2017	call with Adrian Bacon re strategy and motion	1
10/2/2017	further review and revisions to draft brief	2.5
10/11/2017	review court minute order;	0.2
10/11/2017	discuss case status with firm	0.5
10/13/2017	call with Adrian Bacon re case strategy and marketing possibilities	2
10/25/2017	call with Adrian Bacon re new dasher outreach program	1
10/30/2017	open new client files for large number of dashers; calendar deadlines; discussion with Adrian Bacon and staff	4.5
11/16/2017	discuss case status and evidentiary findings and status of outreach with Adrian	1.5
12/2/2017	periodic case file review; check calendar and deadlines; ensure things on track	1
12/15/2017	discuss case status and evidentiary findings and status of outreach with Adrian	2
1/24/2018	emails with Marciano counsel	0.3
1/24/2018	call with Adrian Bacon re Marciano	0.5
1/31/2018	call with Adrian Bacon re case status	0.5
1/24/2018	emails with Marciano counsel	0.3
1/24/2018	call with Adrian Bacon re Marciano	0.5
1/26/2018	emails with defense and adrian re case management	0.4
1/26/2018	review case anywhere postings	0.2
1/26/2018	emails with Marciano counsel	0.5
1/26/2018	call with Shannon Liss-Riordan	0.3
1/26/2018	discuss case with Adrian Bacon	0.5
2/7/2018	emails with Marciano counsel	0.5

2/8/2018	emails with Marciano counsel	0.5
2/8/2018	emails with firm re scheduling and assignment of projects	0.3
2/13/2018	emails with counsel re briefing schedule	0.3
2/13/2018	comprehensive case file review	1
2/13/2018	update firm calendar and deadlines	0.2
2/14/2018	discussion of McGill issues in case with firm	0.3
2/14/2018	review supplemental papers filed in Marciano matter; discuss with Adrian bacon	3
2/15/2018	call with Adrian Bacon	0.5
2/15/2018	further review of Marciano filings; discuss outline of draft response with Adrian	3.8
2/15/2018	review court order re motion to compel; discussion with Adrian Bacon	1.2
2/16/2018	discuss case with Adrian Bacon	1
2/16/2018	review sandquist case; review of arbitration agreement; notes re same	2.5
2/26/2018	review draft of supplemental brief; discuss with Adrian Bacon	3
3/10/2018	receipt of Defendant's supplemental brief; review and discuss with Adrian	2.5
3/16/2018	emails re case strategy and status	0.5
3/17/2018	receipt of supplemental brief from Marciano and declarations; discuss with Adrian	1.5
3/17/2018	receipt of supplemental brief from Doordash; discuss with adrian	1.5
3/17/2018	firm discussion with Adrian and Yoel re next steps and case strategy	2
3/18/2018	strategy discussions with Adrian and Yoel	2
3/19/2018	calls and emails with Adrian and Yoel	1.2
3/20/2018	extensive discussions with Adrian Bacon to prepare for hearing in Marciano	4
3/21/2018	extensive discussions with Adrian Bacon to prepare for hearing in Marciano	3.5
3/22/2018	Assist Adrian with preparation for hearing	1.5
3/22/2018	call with Adrian Bacon and Yoel H re hearing	0.5
3/28/2018	emails with firm regarding legal doctrines relating to case and possible legal research avenues	0.5
3/28/2018	review/revise draft of supplemental brief	5
3/29/2018	call with Adrian Bacon and Yoel; further revisions to draft	5
3/30/2018	review final draft of brief; make suggestions and edits; discussions with Adrian and Yoel	5.8
3/31/2018	review filed draft; emails with Yoel re errata	1
4/1/2018	emails with defense counsel	0.2
4/9/2018	call with Adrian Bacon re case strategy and status	1
4/9/2018	receipt of reply brief; review and discuss with Adrian	2
4/10/2018	extensive email and phone discussions with Yoel and Adrian	2.5
4/12/2018	emails with defense re filings	0.2
4/13/2018	comprehensive case file review	1

4/13/2018	firm roundtable re new DOL opinions; emails re same	0.8
4/18/2018	emails with Adrian re case status	0.2
4/18/2018	Calls with Adrian	1
4/19/2018	review minute order; discuss with Adrian	1
4/19/2018	Calls with Adrian and Yoel; strategy meeting	1
4/19/2018	emails with Adrian re case status	0.2
4/20/2018	review research findings regarding appellate procedure and rules of court	2.4
4/20/2018	emails with Yoel and adrian re case strategy	0.8
4/30/2018	review order granting motion to compel; discuss with adrian	0.7
5/1/2018	review Dynamex decision; discussions with Adrian	5
5/3/2018	Strategy discussions with Adrian, Yoel Mordechai and Tom regarding impact of decision on Doordash case and how these change the strategy of the rest of litigation on the case	4
5/7/2018	emails with Yoel and adrian re case strategy	0.2
5/9/2018	emails re appeal and transcript of proceedings; check status of final judgment	0.5
5/10/2018	emails re proposed judgment and strategy; review proposed judgment	0.6
5/18/2018	emails with firm re appeal and case status	0.3
5/30/2018	emails with firm re appeal and case status	0.3
6/25/2018	review Fast Pay feature; discussion roundtable with Adrian and Tom re same	3
7/2/2018	emails with firm re appeal and case status; review docket	0.6
7/10/2018	emails with firm re case status; review filings by Doordash	0.6
7/18/2018	extensive discussion with Adrian and Tom re deactivation policy and impact on merits of the claims; roundtable issues; review findings of Adrian and documents and notes	3.5
7/25/2018	comprehensive case file review	1
7/25/2018	emails with firm re case status; review filings by Doordash	0.6
7/25/2018	review and approve notice of appeal	0.8
8/2/2018	comprehensive case file review	1
8/2/2018	review results of Mordechai project	2.5
8/6/2018	review designation of record on appeal; discuss with Erika and Adrian	1.3
8/7/2018	emails with defense; update rest of firm on defense email	0.2
8/8/2018	emails with firm re court of appeal voicemail and filing issues	0.3
8/9/2018	emails re appeal and designation of record; review case file and appellate and objection record	1.3
8/9/2018	emails with yoel and adrian re appeal and case status	0.5
8/13/2018	emails with attorneys at firm re appellate status	0.4
8/15/2018	firm discussion regarding new potential claims for case on behalf of dashers	2
8/19/2018	Review new case file; discussion with adrian bacon	2.5
8/21/2018	draft notice of lodgment	0.8

8/30/2018	firm roundtable discussion re new potential claims	0.8
8/31/2018	review amended notice of designation of record and attachments; emails re same; revisions and approve; oversee filing	2
9/10/2018	periodic case file review; check calendar and deadlines; ensure things on track	1
9/10/2018	emails re appeal and future deadlines	0.3
9/11/2018	emails re appeal and future deadlines	0.3
9/15/2018	roundtable findings of revisions to dasher model with firm; discuss impact on case	0.8
9/18/2018	review and approve civil info sheet	0.3
9/19/2018	receipt of proposed scheduling order from Judge Phillips; calendar in firm files; discuss deadlines and assignment of tasks to associates with Adrian	2.5
9/21/2018	case file review; analysis of future projects and discuss with Adrian and Erika assignment of tasks	2.8
9/25/2018	review motion to dismiss appeal filed by Marciano	2.3
9/25/2018	extensive emails with firm re appellate status and motion; litigation strategy	1
9/27/2018	review findings of Tom on research project; discussion with firm	2.5
9/28/2018	emails with firm re case status	0.3
10/1/2018	emails with firm re intervention and appeal issues	1
10/2/2018	case file review; call with Adrian Bacon re status of case and future projects	2
10/3/2018	discuss new claims for dashers with firm	0.5
10/11/2018	emails with firm re project status	0.3
10/15/2018	periodic case file review; check calendar and deadlines; ensure things on track	1
10/26/2018	review transcripts of proceedings	2
10/26/2018	emails with firm re status of motions and other projects	0.4
11/20/2018	case file review; discuss status with Adrian Bacon	1
11/30/2018	call with Adrian Bacon re case status	1
12/12/2018	discuss case with Adrian Bacon	1
12/12/2018	emails internally and externally re scheduling	0.5
12/13/2018	emails with defense	0.1
12/14/2018	emails with Adrian re case status	0.2
12/17/2018	review Marciano Brief; discuss with Adrian Bacon	3
12/17/2018	discuss legal question with Adrian and Meghan George	0.5
12/17/2018	periodic case file review; check calendar and deadlines; ensure things on track	1
12/18/2018	emails re Marciano appeal	2
12/20/2018	call with Adrian Bacon	0.5
12/31/2018	call with Adrian Bacon re strategy	1
12/31/2018	emails re intervention with firm	0.5

1/9/2019	phone call with Adrian Bacon	0.5
1/9/2019	periodic case file review; check calendar and deadlines; ensure things on track	1
1/9/2019	emails with firm and defense re mediation and discovery issues	1
1/10/2019	phone call with Adrian Bacon	0.5
1/15/2019	phone call with Adrian Bacon	0.5
1/17/2019	review notice of reassignment; discuss with Adrian Bacon	1
1/28/2019	phone call with Adrian Bacon	0.5
1/29/2019	phone call with Adrian Bacon	0.5
2/12/2019	periodic case file review; check calendar and deadlines; ensure things on track	1
2/25/2019	emails with defense and Mr. Ortman re mediation	0.7
2/25/2019	discuss case status with Adrian Bacon	0.5
2/26/2019	emails with defense and Mr. Ortman re mediation	0.4
2/27/2019	emails with defense and Mr. Ortman re mediation	0.4
3/6/2019	emails with defense and Mr. Ortman re mediation	0.5
3/7/2019	emails with mediator	0.2
3/7/2019	call with Adrian Bacon re upcoming mediation; strategy and next steps	1.5
3/7/2019	handle billing on case	0.3
3/7/2019	discuss case status with firm	0.2
3/7/2019	receipt of mediation invoice and mediator's procedures; review and discuss with Adrian	1.2
3/10/2019	periodic case file review; check calendar and deadlines; ensure things on track	1
3/10/2019	discuss case status with firm	0.2
3/11/2019	discuss case status with firm	0.2
3/11/2019	emails with defense and arbitrators re scheduling and mediation issues	0.2
3/12/2019	discuss case status with firm	0.2
3/28/2018	emails with firm regarding legal doctrines relating to case and possible legal research avenues	0.5
3/14/2018	extensive discussion with Adrian Bacon re case status	1
4/9/2019	periodic case file review; check calendar and deadlines; ensure things on track	1
4/9/2019	call with Adrian Bacon	0.5
4/17/2019	emails re deadlines and future projects with firm	0.3
4/18/2019	call with Adrian re mediation projects	1
4/26/2019	roundtable with firm members on McGill v Citibank issues relating to Doordash case and potential public injunctive relief claims	2
4/29/2019	emails with adrian and kelsey re mediation and discovery issues	0.4
5/12/2019	read Magana arbitration ruling; discuss with Adrian and Kelsey	2
7/1/2019	emails with firm re upcoming mediation	0.7
7/31/2019	discuss case status with Adrian and Tom	1

8/7/2019	mediation preparation; draft mediation brief	5.5
8/8/2019	mediation preparation; draft mediation brief	6
8/9/2019	mediation preparation; draft mediation brief	6.5
8/12/2019	discuss potential administration with admins; discuss quotes	4
8/12/2019	discuss case with Adrian Bacon and upcoming mediation progress and status; case file review	2
8/13/2019	draft mediation brief	6.5
8/13/2019	discuss possibility of working with Michael Hassen with Adrian	0.5
8/14/2019	draft mediation brief	7
8/16/2019	final review of mediation brief	4
8/17/2019	discuss case with Adrian Bacon and upcoming mediation progress and status; case file review	1.3
8/18/2019	review mediation materials and damages analysis, discuss with Adrian Bacon to strategize for mediation	6.5
8/19/2019	assist with Adrian Bacon prep for mediation	1
8/20/2019	calls with Adrian Bacon re mediation	0.8
8/20/2019	assist with Adrian Bacon prep for mediation	2.5
8/20/2019	discussion with Michael Hassen re co-counsel arrangement; emails with Adrian and call with Adrian; discuss strategy for mediation	3.2
8/21/2019	assist with Adrian Bacon prep for mediation	3
8/22/2019	pre-mediation discussion with Michael Hassen	2
8/23/2019	Participate remotely in mediation; calls with Adrian Bacon throughout mediation to assist with negotiations; debrief and strategy call after	4
8/24/2019	discussions with Michael and Adrian; strategy post mediation; debrief and discuss and consider next steps	5.5
8/26/2019	emails/discussions with Adrian and Michael Hassen re mediation and case strategy	3
8/26/2019	discuss case status with Adrian	0.5
8/27/2019	call with Adrian and michael re next steps	0.3
8/28/2019	extensive case file review/ strategy	4
8/30/2019	Follow up with mediator; discussion with Adrian Bacon	0.5
9/3/2019	Follow up with mediator; discussion with Adrian Bacon	0.5
9/5/2019	discuss case status and future deadlines with firm	0.5
9/6/2019	case file review; strategy considerations re settlement of class claims	3.5
9/7/2019	research standing of intervention in PAGA settlements vs classes	4
9/9/2019	call with Adrian and michael re next steps	0.3
9/10/2019	Follow up with mediator; discussion with Adrian Bacon	1
9/11/2019	Follow up with mediator; discussion with Adrian Bacon	1
9/16/2019	Follow up with mediator; discussion with Adrian Bacon	1
9/18/2019	call with Adrian and michael re strategy	0.3
9/20/2019	Follow up with mediator; discussion with Adrian Bacon	1
9/20/2019	call with Adrian and michael re strategy	1.1

9/23/2019	call with Adrian and michael re strategy	0.3
9/26/2019	call with Adrian and michael re strategy	0.2
9/26/2019	Follow up with mediator; discussion with Adrian Bacon	0.5
9/26/2019	review case law sent by mediator - analysis of applicability to doordash case; discussion with Adrian and strategy issues	2
9/30/2019	Follow up with mediator; discussion with Adrian Bacon	0.5
10/1/2019	discuss necessity of potential intervention and consolidation of other ongoing cases with Adrian to protect from reverse auction scenario; review case file and other pending actions	4.5
10/7/2019	Follow up with mediator; discussion with Adrian Bacon	0.5
10/10/2019	Follow up with mediator; discussion with Adrian Bacon	0.5
10/12/2019	strategy call with Adrian Bacon	0.7
10/13/2019	strategy call with Adrian Bacon	0.8
10/16/2019	strategy call with Adrian Bacon	0.6
10/17/2019	strategy call with Adrian Bacon	0.4
10/18/2019	emails with Adrian and Michael Hassen re mediation and case strategy	0.3
10/25/2019	emails with Adrian and Michael Hassen re mediation and case strategy	0.5
10/25/2019	calls with Adrian Bacon	1
10/26/2019	calls with Adrian Bacon	1
10/26/2019	Phone call with Michael re case strategy and settlement issues	1.2
10/27/2019	Phone call with Michael re case strategy and settlement issues	0.7
10/28/2019	discuss with Adrian Bacon	1
10/28/2019	Emails with Adrian and Michael Hassen	0.4
10/28/2019	emails with Michael Hassen re litigation strategy	0.5
10/29/2019	Emails with firm re case strategy	1.2
10/29/2019	emails and lengthy telephone discussions with Michael Hassen and Adrian re litigation strategy; case file review and legal research	4.5
10/29/2019	review preliminary draft of memorandum from Michael Hassen; discuss with Adrian and Michael	4
10/29/2019	emails to other counsel in existing cases	1
10/29/2019	discuss case with Adrian and review proposed email to other firms before transmission	0.4
10/30/2019	emails and call with Michael Hassen re case strategy and projects	0.7
10/30/2019	extensive emails with counsel for other cases and defendant	0.8
10/30/2019	review and revise memorandum of points and authorities in support of motion to transfer	1
10/30/2019	review ex parte application to lift stay for limited purposes	1
10/30/2019	coordinate filing of ex parte application to be completed next day	0.5
10/30/2019	emails with Adrian and Michael re case status	0.3
10/31/2019	call and emails with defense re ex parte	1
10/31/2019	oversee finalization and filing of ex parte application	0.6
10/31/2019	call with Adrian re case	1

11/1/2019	call with Adrian Bacon	0.7
11/1/2019	emails with Adrian re arbitration and case strategy issues	0.5
11/1/2019	emails with defense re arbitration and scheduling issues	0.3
11/4/2019	call with Adrian Bacon	0.7
11/4/2019	emails with defense re ex parte and other case management issues	0.4
11/4/2019	emails with Shannon Liss Riordan	0.2
11/4/2019	emails with other plaintiff counsel	0.5
11/5/2019	call with Adrian Bacon	0.5
11/6/2019	emails and multiple calls with Adrian re case strategy	3
11/6/2019	emails with defense re ex parte and case management issues	0.6
11/6/2019	emails with Shannon Liss Riordan	0.6
11/6/2019	emails with defense re settlement	0.3
11/7/2019	review and revise joint prosecution agreement; discussion with Adrian	1
11/7/2019	review revised fee sharing agreement; discussion with Adrian and Shannon and further redlines; coordinate finalization	0.8
11/7/2019	emails with defense re scheduling	0.2
11/7/2019	call with Adrian re case status	0.8
11/8/2019	emails with defense re scheduling	0.4
11/8/2019	call with Adrian re case status	0.8
11/12/2019	emails with counsel re case status issues	0.2
11/18/2019	emails with cocounsel re case strategy	0.3
11/20/2019	emails with cocounsel re settlement	0.2
11/20/2019	extensive case search for all active lawsuits involving doordash for any wage and hour claims involving California claims; discuss possibility of bringing other firms with existing cases into settlement	2.5
11/21/2019	emails with cocounsel re settlement	1.5
11/21/2019	comprehensive review of settlement documents; review and finalize and discuss	3.5
11/21/2019	call with clients to provide update	1
11/21/2019	further review for existing cases on public docket and LWDA PAGA letters; review of every major county in California, and all federal dockets, as well as LWDA	2
11/22/2019	calls with Michael Hassen and adrian bacon	1.2
11/22/2019	extensive case file review; discussion with Michael Hassen and adrian	2
11/22/2019	emails re preliminary approval; review approval filings	3
11/22/2019	extensive email communications re case status; discussion with Adrian and Michael	1.8
11/22/2019	review intervention and objection papers	2.5
11/22/2019	calls with Michael Hassen and adrian bacon	0.9
11/26/2019	review supplemental settlement filings; emails re same	0.3
12/5/2019	extensive emails with cocounsel re objectors and intervenors	2

12/5/2019	review proposed intervenors communications; discussion with Adrian and Michael, and emails with cocounsel	4
12/6/2019	Call with Michael Hassen re opt out and objection strategy considerations	1.5
12/6/2019	search for cases involving law firms and intervenors' cases; comprehensive review and search	2
12/7/2019	review objection of Robinson and accompanying documents; discuss with Adrian Bacon	3
12/7/2019	review motion for temporary restraining order re arbitration in Abernathy case; review abernathy case docket	2.5
12/9/2019	Emails re ex parte application and case strategy	0.5
12/10/2019	review ex parte application of proposed intervenors; emails with co-counsel re same; prepare for ex parte hearing; discussions with Michael Hassen	5.5
12/10/2019	further investigation on proposed intervenors' cases; emails with Adrian and Michael re same	3.5
12/11/2019	review opposition to ex parte application	1.6
12/11/2019	emails with cocounsel re ex parte application	0.2
12/12/2019	emails with Adrian, Michael and co-counsel re ex parte hearing and preliminary approval issues	0.5
12/12/2019	call with michael hassen re ex parte hearing	1.2
12/12/2019	review additional intervention papers from romero plaintiff; emails with counsel; call with Adrian re same	5
12/13/2019	research on recent 9th circuit case re objections; emails with cocounsel re same	1
12/16/2019	calls with Michael Hassen re settlement issues	1.2
12/16/2019	Call with Adrian Bacon re settlement issues	0.4
12/16/2019	emails with counsel re settlement issues and court tentative ruling	1.2
12/16/2019	extensive legal analysis and strategy considerations re settlement issues	3.5
12/16/2019	monitor court tentative rulings throughout day; pull tentative ruling and circulate to co-counsel; emails re same	2
12/17/2019	Emails with co-counsel re settlement issues and strategy	1
12/17/2019	call with Capstone attorneys re settlement	0.4
12/18/2019	emails with counsel re scheduling issues	0.4
12/18/2019	Call with Adrian Bacon re settlement issues	0.4
12/18/2019	Emails with co-counsel re settlement issues and strategy	0.3
12/19/2019	emails with counsel re scheduling issues; update firm calendar with new deadlines and dates	0.8
12/19/2019	Call with Adrian Bacon re settlement issues	0.4
12/19/2019	Emails with co-counsel re settlement issues and strategy	0.3
12/19/2019	call with Zimmerman Reed re settlement and intervention issues	0.3
12/19/2019	calls with Michael Hassen re strategy	1.2
12/20/2019	emails with counsel re scheduling issues	0.3

12/23/2019	review motions to intervene and accompanying materials; case file review	3.5
12/27/2019	Emails with co-counsel re settlement issues and strategy	0.7
12/30/2019	call with Capstone attorneys re settlement	0.5
12/30/2019	discussion with Michael Hassen re intervenors and next steps	0.5
12/30/2019	Call with Adrian Bacon re settlement issues	0.6
12/31/2019	discussion of strategy issues with Shannon	0.2
12/31/2019	review McGrath intervention motion	0.5
12/31/2019	emails with co-counsel re settlement and other overlapping cases	1.2
12/31/2019	call with Adrian Bacon re strategy with intervention	0.8
12/31/2019	call with Adrian Bacon re strategy with intervention	0.8
1/2/2020	Emails with counsel re discussions with other plaintiff counsel	0.4
1/3/2020	discuss settlement issues with Michael Hassen	2
1/6/2020	discuss intervention and objectors with Adrian Bacon	1
1/6/2019	emails with Capstone and with other counsel	0.5
1/7/2020	coordinate calls with other plaintiff firms re settlement	0.5
1/7/2020	emails with cocounsel re settlement progress and preliminary approval	
1/7/2020	call with Adrian Bacon re opt out campaign from other firms	0.5
1/9/2020	coordinate further discussions with other plaintiff firms re settlement	0.3
1/9/2020	call with Adrian re case status	0.8
1/9/2020	emails with co-counsel re settlement	0.5
1/9/2020	extensive emails with cocounsel	0.8
1/9/2020	emails with Rick Prieto	0.2
1/9/2020	call with Michael Hassen re case status	0.2
1/9/2020	emails with Jahan Sagafi; strategy call with Adrian	1.2
1/10/2020	extensive emails traffic with cocounsel, intervenors, and Adrian re case status	1.4
1/10/2020	review opposition to motion to intervene; discuss with Adrian	1
1/10/2020	discuss case status with Adrian	1
1/13/2020	discuss motion to intervene with adrian and michael	1
1/15/2020	comprehensive case file review	1
1/15/2020	extensive emails with plaintiff counsel and co-counsel	1.5
1/15/2020	call with Adrian re case strategy	1
1/16/2020	emails and call with Adrian and michael re settlement issues	0.8
1/16/2020	draft joint prosecution agreement	1
1/16/2020	call and emails with Capstone attorneys re settlement	0.5
1/17/2020	coordinate consolidation of Campbell case with Marciano; emails with Capstone, and co-counsel re same; calls with Adrian and Michael; assign stipulation to consolidate to Michael	2.5
1/18/2020	call with Michael and Adrian re stipulations and settlement progress	0.3
1/21/2020	discuss case strategy with Michael Hassen	1.5
1/22/2020	call with Adrian Bacon	0.5

1/22/2020	emails with counsel re consolidation	0.3
1/23/2020	review stipulation to consolidate; emails re same	0.7
1/23/2020	call with Adrian Bacon	0.5
1/23/2020	emails with cocounsel re consolidation and settlement progress	0.8
1/23/2020	review reply in support of preliminary approval	2
1/23/2020	discussion with Capstone and Adrian	0.5
1/29/2020	review court order; emails with cocounsel re same; call with Adrian Bacon	1.2
1/30/2020	comprehensive file review	2
1/31/2020	review edits to joint prosecution agreement with Capstone; discussion of redline with Adrian and Michael; emails re same; phone calls	2
2/5/2020	receipt of signed jpa with Lowe counsel; emails re same	0.3
2/6/2020	discussion of case strategy and status with Shannon	0.2
2/11/2020	review federal court order re opt out procedures; discussion with co-counsel re same and case strategy	1.5
2/13/2020	emails with court and counsel re intervention issues and new hearing; emails with adrian and erika re same	0.6
2/14/2020	emails with court and counsel re intervention issues and new hearing; emails with adrian and erika re same	0.6
2/14/2020	review attachments to emails re motion to intervene	3
2/18/2020	call with Adrian Bacon re settlement issues	0.5
2/18/2020	emails with capstone and cocounsel re settlement issues	0.3
2/25/2020	emails with capstone and cocounsel re settlement issues	0.3
2/28/2020	Emails re case strategy and settlement	0.4
3/17/2020	emails with court and cocounsel	0.3
3/17/2020	call with adrian bacon	0.5
3/26/2020	review notice of motion to withdraw intervention; discussion with cocounsel	0.6
3/26/2020	call with Michael Hassen	0.4
4/13/2020	emails with cocounsel re settlement issues	0.3
4/14/2020	emails with capstone, adrian and erika	0.3
4/14/2020	emails with cocounsel re settlement issues	0.3
4/14/2020	call with Adrian Bacon	0.8
4/14/2021	case file review	0.5
4/24/2020	circulate tentative ruling; discussion with Adrian and Shannon; review	2
4/24/2020	discuss strategy with Michael Hassen	1
4/29/2020	further discussion with Adrian re tentative ruling	0.6
4/29/2020	emails with cocounsel re tentative ruling	0.2
4/30/2021	emails with cocounsel re tentative ruling	0.2
5/11/2020	emails with cocounsel re tentative ruling	0.5
5/15/2020	emails with cocounsel re tentative ruling	0.2
5/15/2020	call with Adrian Bacon	0.5
5/21/2020	emails with counsel and court re intervention	0.2

5/22/2020	review supplemental brief; emails with counsel re same	0.6
5/22/2020	call with Adrian Bacon	0.4
6/1/2020	discussion of intervention and settlement issues with cocounsel	0.8
6/2/2020	thorough review of revised settlement agreement; emails with co-counsel re same	3.6
6/2/2020	review new filings by intervenors; discussion re same	0.5
6/3/2020	call with Adrian Bacon	0.4
6/3/2020	emails with cocounsel re settlement issues	1
6/4/2020	emails with cocounsel re settlement	0.4
6/4/2020	call with Adrian Bacon	0.3
6/4/2020	review declaration of Lowe; coordinate finalization of declaration	0.5
6/4/2020	emails with cocounsel re settlement	0.5
6/5/2020	emails with co-counsel re settlement progress	0.6
6/5/2020	coordinate revisions to declaration of Lowe	0.2
6/5/2020	review approval docs and thorough case file review for upcoming filing	3
6/7/2020	emails with cocounsel re settlement and intervention issues	0.3
6/7/2020	factual investigation into opt out radio campaign by other firm	1.5
6/8/2020	emails with cocounsel, capstone, and other plaintiffs counsel regarding settlement agreement, approval documents and revisions; review approval docs for filing	4
6/8/2020	call with Adrian Bacon	0.5
6/16/2020	review filings; emails re same	0.2
6/17/2020	emails re settlement issues and case status	0.3
6/18/2020	emails with court and counsel	0.2
6/18/2020	review supplemental authority, strategy discussion	1
6/19/2020	email and phone discussion with Adrian Bacon, michael hassen, co-counsel and defense counsel re status of intervention, tentative rulings and other settlement and approval related issues	2
6/19/2020	review statement of decision	1
6/19/2020	emails with court and counsel re approval	0.2
6/22/2020	call with Michael Hassen	0.3
6/22/2020	emails with cocounsel re upcoming hearing	0.2
6/23/2020	emails with cocounsel re hearing and further settlement issues	0.5
6/23/2020	emails re joint status report; review and approve status report for filing	0.4
6/26/2020	review proposed order of intervenors; emails re same with cocounsel	0.6
6/26/2020	call with Michael Hassen	0.4
6/29/2020	emails with counsel and court	0.4
7/7/2020	extensive strategy emails with cocounsel re case status and further objectors and intervenors	1.5
7/7/2020	call with Adrian Bacon	1
7/14/2020	discussions with Shannon re case strategy	1
7/14/2020	extensive email traffic with cocounsel and intervenors	1

7/14/2020	call with Adrian Bacon	1
7/15/2020	call with Joel Tidrick; notes to file; pre-call prep	1
7/15/2020	call with Adrian Bacon	0.6
7/15/2020	emails with Shannon re case status	0.3
7/16/2021	emails with co-counsel and with objectors	0.5
7/17/2021	emails with cocounsel re case strategy and status	0.5
7/21/2020	emails with intervenors	0.2
7/21/2020	extensive email dialogue with cocounsel re case status and strategy issues as well as preliminary approval status	2.5
7/22/2020	extensive email dialogue with cocounsel re case status and strategy issues as well as preliminary approval status	2.5
7/22/2020	emails with intervenors	0.2
7/22/2020	emails re revisions to settlement agreement and preliminary approval docs	0.5
7/24/2020	review revised settlement release and accompanying documents; discussion with co-counsel, Adrian and clients; facilitate gathering signatures from other plaintiffs	3.5
7/25/2020	review preliminary approval filings; discussion with Adrian re case strategy and status	4
7/28/2020	update case file and calendar	1
9/1/2020	review order denying preliminary approval; strategy discussion with cocounsel re same	4
9/2/2020	call with Adrian Bacon	1
9/2/2020	strategy discussions with cocounsel re further settlement negotiation strategy	2
9/9/2020	strategy discussions with cocounsel re further settlement negotiation strategy	0.4
9/22/2020	strategy discussions with cocounsel re further settlement negotiation strategy	0.3
9/23/2020	strategy discussions with cocounsel re further settlement negotiation strategy	0.4
9/24/2020	emails re mediation and settlement negotiations	0.5
9/28/2020	call with Michael Hassen	0.4
9/28/2020	emails with defense re marko action and status report	0.2
10/7/2020	emails with cocounsel re settlement	0.2
10/22/2020	emails with cocounsel re settlement	0.4
10/30/2020	emails with cocounsel re settlement	1.5
10/30/2020	review draft settlement agreement	3.5
10/30/2021	call with Adrian Bacon	0.5
10/30/2021	facilitate getting signatures from other plaintiffs; emails re same	1
11/2/2020	discussions with other plaintiff firms re settlement and new release	0.5
11/3/2020	emails with cocounsel and plaintiff counsel re release and settlement issues	0.5

11/5/2020	review supplemental brief in support of approval	1.5
11/16/2020	emails with Joel Young and Steve Tidrick	0.3
11/16/2020	call with Adrian Bacon	0.5
11/17/2020	emails with Joel Young and Steve Tidrick	0.3
11/17/2020	call with Adrian Bacon	0.5
11/17/2020	review objection of Antic; emails with cocounsel re same	2.8
11/17/2020	call with Michael Hassen	0.5
11/19/2020	discussions with Abye re Antic objection	0.5
11/19/2020	emails with cocounsel re objection and motion to strike	0.6
11/20/2020	call with Michael Hassen re motion to strike	0.5
11/20/2020	review motion to strike	0.5
11/20/2020	emails with cocounsel re approval status and strategy	1.2
11/23/2020	emails with cocounsel re objections and settlement issues	0.5
11/24/2020	emails with cocounsel re objections and settlement issues	0.5
12/3/2020	emails with cocounsel re case status	0.3
12/23/2020	extensive emails re case status with cocounsel	1.2
12/23/2020	reach out to intervenor to discuss case	0.5
12/29/2020	review intervention motion;	1.5
12/29/2020	call with Michael Hassen re strategy and intervention issues	1
12/29/2020	emails with cocounsel re case strategy and status issues	0.4
12/30/2020	multiple called with Abye re antic intervention	0.8
12/30/2020	strategy call with co-counsel; emails re same	0.5
12/30/2020	call with Adrian Bacon	0.5
12/30/2020	draft joint prosecution agreement with Antic	1.2
12/31/2020	further calls with abye re intervention	0.4
12/31/2020	emails with cocounsel re strategy	0.5
1/4/2021	further calls with abye re intervention	0.4
1/4/2021	emails with cocounsel re settlement issues	0.2
1/5/2021	emails with cocounsel re settlement issues	0.8
1/5/2021	call with Adrian re settlement issues	0.3
1/5/2021	review amendment to settlement agreement; emails re same	0.5
1/6/2021	extensive emails re settlement approval with cocounsel; facilitate additional signatures from plaintiffs; review final draft of papers	2.5
1/7/2021	extensive emails re settlement approval with cocounsel; facilitate additional signatures from plaintiffs; review final draft of papers	1.5
1/20/2021	update firm calendar; review docket minute order new hearing; emails with cocounsel re same	1
2/2/2021	call with Michael Hassen re strategy and intervention issues	1-Jan
2/3/2021	review response to objection of Allen Graves; discuss with Adrian Bacon	2
2/4/2021	review prop 22 development; discuss whether it impacts class members with Adrian	1.2

2/10/2021	call with Adrian Bacon re case strategy and findings	1
2/10/2021	emails with cocounsel re objection	0.4
2/11/2021	call with Allen Graves; notes to file re discussion	0.8
2/11/2021	call with Adrian Bacon	0.5
2/12/2021	call and emails with cocounsel re case status and settlement and approval issues	0.5
2/17/2021	emails with court clerk and cocounsel re preliminary approval	0.7
2/17/2021	update firm calendar	0.3
2/17/2021	call with Adrian Bacon re case status	0.5
2/26/2021	discuss case with Adrian	0.8
3/3/2021	prepare for mediation with Tripper Ortman	2.8
3/3/2021	emails with cocounsel re moving mediation date	0.2
3/4/2021	emails with cocounsel and court re preliminary approval	0.5
3/6/2021	discussion of case with Tom and Adrian	0.5
3/15/2021	call with adrian bacon	0.5
3/15/2021	emails with cocounsel re mediation	0.3
3/16/2021	emails with cocounsel re mediation	0.3
3/16/2021	extensive file review and preparation for mediation	4.5
3/16/2021	call with adrian to prep for mediation	1
3/17/2021	extensive file review and preparation for mediation	5.5
3/17/2021	pre-mediation discussion and emails re strategy	1
3/17/2021	call with cocounsel re mediation	0.5
3/17/2021	calls with Adrian re mediation and settlement issues	1
3/17/2021	comprehensive review of doordash mediation statement and accompanying materials for mediation with Tripper Ortman	2
3/18/2021	calls with Adrian re settlement issues	1
3/18/2021	prepare for and attend mediation and negotiate for class	2.5
3/18/2021	emails with cocounsel re case strategy	0.2
3/18/2021	review legal research results of Adrian	1.2
3/19/2021	call with adrian bacon re strategy and case management	1
3/19/2021	case file review; prepare for call and have call with Alen graves	1
3/19/2021	emails with cocounsel re preliminary approval issues	0.3
3/25/2021	emails with cocounsel re preliminary approval issues	1.2
3/26/2021	call with Adrian Bacon	0.8
3/26/2021	extensive emails with cocounsel re preliminary approval issues	2
3/25/2021	call with Allen Graves; notes of call to file and emails re same with cocounsel	1.2
3/29/2021	begin draft of new retainer for fee split with clients	1
3/29/2021	review settlement docs; review complex CMO checklist to ensure compliance with all major terms; discuss with Adrian before circulating redline	4.5
3/29/2021	emails re preliminary approval	0.5

3/29/2021	call with Adrian re preliminary approval	0.4
3/29/2021	call with cocounsel re preliminary approval	0.5
3/30/2021	call with Adrian Bacon re preliminary approval issues	0.5
3/30/2021	review comments to redline of second amended complaint; emails re same	1.2
4/1/2021	emails re settlement	0.2
4/2/2021	review proposed changes to settlement release	2
4/2/2021	send draft declaration of firm to cocounsel	0.3
4/2/2021	emails with defense and cocounsel re settlement	0.5
4/3/2021	emails re settlement agreement	0.2
4/5/2021	extensive email exchanges and texts and calls regarding settlement issues with defense, cocounsel and plaintiff attorneys; facilitate signatures	5
4/5/2021	review and approve final version of settlement agreement	3
4/6/2021	call with adrian bacon	0.6
4/6/2021	extensive strategy emails re preliminary approval issues with cocounsel and with firm re CMO, and approval requirements; emails calls and texts with other plaintiff firms	4
4/6/2021	review and approve fee sharing agreement; discuss with Adrian Bacon	1
4/7/2021	dozens of emails, texts and calls; assist with coordinating signature pages from other plaintiffs and other preliminary approval issues	4
4/8/2021	call with adrian re case status	1
4/8/2021	Emails with cocounsel re preliminary approval	0.9
4/9/2021	emails with cocounsel and plaintiff counsel re approval documents and additional signatures	0.6
4/13/2021	call clerk reserve hearing date; update firm calendar and emails re same	0.5
4/13/2021	coordinate signatures from other plaintiff firms for upcoming filing	0.5
4/13/2021	extensive emails re preliminary approval	1.4
4/14/2021	call with Adrian	0.5
4/14/2021	review SLR declaration and other draft approval papers	2.5
4/14/2021	extensive emails re preliminary approval	2
4/15/2021	call with Adrian	0.5
4/15/2021	review complex court CMO	0.5
4/15/2021	review/revise Todd Friedman Declaration	0.7
4/15/2021	review of draft of approval filings, exhibits; emails re same with cocounsel	2
4/16/2021	emails re preliminary approval filing and settlement issues	1.5
4/16/2021	final review of preliminary approval papers; discuss with Adrian Bacon	2
4/22/2021	call with Michael Hassen case update and strategy	0.5
4/27/2021	joint call with defense to clerk re potential hearing date advancement	0.2
4/27/2021	emails with defense and cocounsel re preliminary approval issues	0.8
4/29/2021	review case anywhere posting from court; emails with cocounsel re same	0.4
5/14/2021	call with Adrian re potential shakedown efforts of Preto and strategy issues	0.5
5/14/2021	emails with Rick Preto re potential objection	0.1

5/14/2021	email with co-counsel re potential objector Rick Preto	0.3
5/24/2021	circulate tentative to other plaintiff counsel; request further information and declarations to address court concerns	0.6
5/24/2021	review of tentative ruling; read and discuss with co-counsel	2.7
5/25/2021	coordinate declarations from other plaintiff counsel; review case file and status of project	0.2
5/25/2021	extensive strategy discussion re upcoming deadline; review of prior orders and local rules	1.5
5/27/2021	coordinate declarations from other plaintiff counsel; review case file and status of project	0.2
5/27/2021	emails re status of upcoming deadlines	0.3
6/1/2021	Emails with plaintiff counsel re upcoming deadlines and gathering supplemental materials; review of declarations of counsel	1
6/1/2021	review case file and organization of upcoming tasks for filing deadline	2
6/1/2021	emails re status of upcoming deadlines	1
6/1/2021	call with cocounsel	0.5
6/2/2021	call with Adrian re status of case	0.5
6/3/2021	emails re status of upcoming deadlines	0.2
6/3/2021	coordinate declarations from other plaintiff counsel; review case file and status of project; review declarations from other plaintiff firms	1
6/3/2021	emails re status of upcoming deadlines	0.4
6/6/2021	coordinate declarations from other plaintiff counsel; review case file and status of project; review declarations from other plaintiff firms	1
6/9/2021	coordinate declarations from other plaintiff counsel; review case file and status of project	0.4
6/9/2021	emails with counsel re status of upcoming deadline	0.2
6/14/2021	coordinate declarations from other plaintiff counsel; review case file and status of project	0.4
6/15/2021	coordinate declarations from other plaintiff counsel; review case file and status of project	0.4
6/15/2021	extensive review of supplemental briefing, settlement agreement, exhibits; email re same	2.5
6/16/2021	call with Adrian re status	0.5
6/16/2021	emails with cocounsel and other plaintiff lawyers re motion for approval	0.7
6/17/2021	extensive emails coordinating documents from co-counsel and other plaintiffs	2.2
6/17/2021	review final filing; discuss with Adrian	2
6/18/2021	Emails re status of filing	0.3
6/25/2021	review tentative ruling; emails re same	2
6/28/2021	emails with cocounsel re tentative ruling and supplemental brief	0.7
7/1/2021	review supplemental draft; emails re same	2
7/6/2021	emails with counsel re supplemental filing and upcoming hearing	1

7/6/2021	status update call with Michael Hassen	1
7/6/2021	review and approve final draft of supplemental filing	2
7/8/2021	review court posting on case anywhere; emails re same	0.2
7/8/2021	emails with counsel re settlement issues	0.7
7/9/2021	review court posting on case anywhere; emails re same	0.2
7/9/2021	review materials sent by other plaintiff lawyers; coordinate signatures and other items with other plaintiff firms	0.5
7/9/2021	extensive emails re finalization of supplemental filing and administration issues	0.8
7/10/2021	extensive emails re finalization of supplemental filing and administration issues	0.8
7/11/2021	finalize and approve final declaration in support of supplemental filing	0.5
7/11/2021	draft declaration in support of preliminary approval	1
7/11/2021	call with Adrian re approval	0.6
7/12/2021	call with Adrian re approval	0.4
7/12/2021	extensive emails re administration and finalization of supplemental filing	3
7/13/2021	receipt of and review notice of ruling	0.5
7/13/2021	extensive emails re settlement and administration issues	2.5
7/14/2021	emails with counsel and administrator	0.3
7/21/2021	discuss case status with Michael Hassen	1.2
7/21/2021	emails with admin	0.1
7/22/2021	emails with admin	0.1
7/22/2021	Case file review	1
7/22/2021	Emails with Michael Hassen and Adrian Bacon re case status and further deadlines	1.2
7/23/2021	review Michael Hassen current billing records	0.5
7/23/2021	emails with Michael Hassen re fee application	0.3
8/3/2021	call with adrian bacon re potential bad faith objectors and strategy	1
8/10/2021	emails with counsel re administration	0.2
8/11/2021	review case file for timing of administration	0.3
8/11/2021	emails with counsel re administration	0.4
8/12/2021	emails with counsel re administration	0.2
8/13/2021	emails with counsel and administrator	0.6
8/16/2021	call with Adrian re case status	0.5
8/16/2021	emails re administration issues	0.4
8/16/2021	call with administrator re upcoming project and q&a	0.6
8/20/2021	review claim form	0.2
8/20/2021	emails with administrator and counsel re settlement and admin issues	1
8/23/2021	emails regarding administration and timing issues	0.4
8/25/2021	review class settlement website	0.5
8/25/2021	extensive email traffic re administration issues	1

8/26/2021	email traffic re administration issues with defense, administrator and cocounsel	1.2
8/26/2021	review FAQ on administration website	1
8/27/2021	discuss administration issues and progress with Adrian	1
8/27/2021	emails with adrian and class members	0.5
8/26/2021	calls with class members	3.7
8/27/2021	calls with class members	6
8/28/2021	calls with class members	6.2
8/29/2021	calls with class members	6.7
8/30/2021	calls with class members	4.5
8/30/2021	receipt of inquiry from press; emails re same	0.2
8/30/2021	emails with cocounsel and administrator re settlement and administration issues	0.7
8/30/2021	receipt of inquiry from press; emails re same	0.2
8/31/2021	emails re administration	1.2
8/31/2021	call with Adrian Bacon re administration status	0.5
8/31/2021	calls with class members	4.5
9/1/2021	review Gizmodo article; search for online social media response to settlement; discuss with adrian bacon	1.4
9/1/2021	coordinate declarations from other plaintiff firms for final approval	0.5
9/1/2021	emails with defense counsel and administrator	0.4
9/1/2021	emails with cocounsel	0.7
9/1/2021	calls with class members	3.5
9/2/2021	emails with defense counsel and administrator	0.7
9/2/2021	call with adrian bacon re case status	0.3
9/2/2021	discussion with class members	0.5
9/2/2021	emails with cocounsel regarding administration proposal	0.5
9/2/2021	calls with class members	1.2
9/3/2021	discussion with class members	0.5
9/3/2021	emails with cocounsel and administrator	0.8
9/3/2021	calls with class members	2
9/6/2021	calls with class members	2.5
9/7/2021	review opt out/objection, emails re same	0.3
9/7/2021	review subsequent reminder notice proposal from administrator, emails re same	0.3
9/7/2021	emails with administration	0.6
9/7/2021	emails with counsel re administration	0.2
9/7/2021	calls with class members	2
9/8/2021	calls with class members	1.8
9/8/2021	discuss case status and declarations with Michael Hassen	0.2
9/8/2021	emails with administrator	0.2

9/8/2021	emails with counsel re case status	0.2
9/8/2021	discussion of case with opt out counsel	0.2
9/9/2021	calls with class members	1.5
9/9/2021	follow up re declarations from counsel	0.2
9/9/2021	review opt out and discuss treatment	0.2
9/10/2021	review weekly administration report	0.2
9/10/2021	calls with class members	2.2
9/10/2021	emails with administrator re further administration notice measures	0.3
9/10/2021	emails with michael hassen	0.2
9/12/2021	call with adrian bacon re case status	0.5
9/13/2021	emails with adrian and erika re approval issues	0.3
9/13/2021	draft declaration in support of fees and costs	5.5
9/14/2021	review capstone declarations	0.4
9/14/2021	calls with class members	1.5
9/14/2021	coordinate declarations from other plaintiffs counsel	0.2
9/14/2021	emails with cocounsel re approval briefing	0.3
9/14/2021	emails with defense re administration	0.1
9/14/2021	draft declaration in support of fees and costs	5.2
9/15/2021	calls with adrian bacon re case status	0.3
9/15/2021	emails with defense and cocounsel re administration	0.4
9/15/2021	emails with administrator	0.2
9/15/2021	discussions with class members	0.3
9/16/2021	calls with adrian bacon re case status	0.5
9/16/2021	discussions with class members	1.5
9/16/2021	review weekly administration report	0.2
9/16/2021	coordinate declarations with co-counsel	0.3
9/16/2021	emails with cocounsel re administration and case status	0.5
9/16/2021	review mass opt outs submissions	0.4
9/16/2021	emails with administrator	0.5
9/17/2021	calls with class members	0.8
9/17/2021	emails with administrator	0.3
9/17/2021	emails with cocounsel re potential objectors	0.3
9/17/2021	review documentation from potential objectors	1.7
9/17/2021	calls with adrian bacon re case status	0.8
9/19/2021	emails with co-counsel re status	0.2
9/19/2021	call with michael hassen re case progress and future projects	0.7
9/19/2021	calls with adrian bacon re case status	0.5
9/20/2021	calls with adrian bacon re case status	0.5
9/20/2021	calls with class members	0.6
9/20/2021	review opt out and objection report and emails with administrator re same	0.5
9/20/2021	comprehensive case file overview to review case history	2.5

9/20/2021	prepare for and attend zoom conference with cocounsel	1
9/20/2021	review Campbell counsel declaration, communications re same	0.5
9/20/2021	begin draft of attorneys' fees and costs declaration	4
9/21/2021	phone calls with adrian bacon re case status and approval issues	0.5
9/21/2021	phone call with defense counsel re administration and approval issues	0.5
9/21/2021	calls with class members	0.3
9/21/2021	review opt out and objection report and emails with administrator re same	0.5
9/21/2021	discussions with adrian bacon and co-counsel	0.4
9/21/2021	coordinate declarations from other plaintiff counsel; review case file and status of project	0.7
9/21/2021	draft declaration in support of attorneys' fees and costs	5.5
9/21/2021	discuss case with Michael Hassen	0.2
9/22/2021	discuss case with Adrian Bacon and co-counsel; emails re same	0.5
9/22/2021	communications with class members	0.3
9/22/2021	emails with co-counsel re fee declarations and client declarations and other administration issues	0.2
9/22/2021	coordinate declarations with cocounsel; review declaration of Abye	0.8
9/22/2021	calls with adrian bacon re case status	0.5
9/23/2021	draft client declarations for attorneys fees and costs and incentive award brief; communicate with clients re same	2.7
9/23/2021	calls and emails with cocounsel re administration and approval issues	2
9/23/2021	review weekly administration report	0.2
9/23/2021	calls with adrian bacon re administration	0.8
9/23/2021	review and approve revised retainer agreement	0.3
9/23/2021	emails with michael Hassen re approval	0.3
9/23/2021	review court record and prior filings; discussion with Adrian	2.5
9/23/2021	emails with staff re administration	0.5
9/24/2021	review declarations submitted by other plaintiff counsel; emails re same	1.5
9/24/2021	dozens of calls and emails with cocounsel re administration and approval issues	3
9/25/2021	emails with cocounsel re approval and motion issues	0.5
9/25/2021	emails with defense and administrator	0.1
9/25/2021	discussions with Adrian re final approval	0.5
9/26/2021	call with adrian bacon; case file review and assist with brief	3.5
9/26/2021	emails with cocounsel re approval and motion issues	0.6
9/27/2021	final review of approval papers for filing; organize declarations and other papers for filing; discussions with cocounsel and adrian	6.8
Various	Future Anticipated Hours	250

TOTAL TIME – 1,137.6
LODESTAR - \$1,023,840.00

Adrian R. Bacon, Esq. – Partner
Rate: \$750/hr

Date	Task	Hours
10/5/2016	investigation into potential misclassification issues under gig economy standards against Doordash	3.5
10/5/2016	email to firm regarding findings, initiate new potential investigation of case	0.3
10/6/2016	discuss campaign for potential client outreach with Todd Friedman	0.5
10/7/2016	work product - further research and investigation	1
10/12/2016	work product - further research and investigation	2
10/13/2016	legal research into misclassification standards	5.5
2/12/2017	review status of outreach project; discuss with Todd Friedman	3
2/14/2017	interview of prospective clients	0.5
2/15/2017	interview of prospective clients	0.5
4/1/2017	emails with Yoel Hanohov re new case	0.5
4/1/2017	call with Todd Friedman re new case theory	0.5
4/2/2017	comprehensive research of other major filings against Doordash	5.5
4/3/2017	company analysis	3.5
4/3/2017	discuss case with client including class action duties and case facts for preparation of complaint	2
4/4/2017	analysis of potential legal claims and viability; legal and factual research	7.5
4/17/2017	emails with firm re case status	0.5
4/21/2017	emails with client	0.3
4/21/2017	case file review	1.2
4/22/2017	emails with client	0.3
4/23/2021	emails with client	0.1
4/23/2017	call with client; gather documents and information for preparation of complaint	1
4/25/2017	call with client; gather documents and information for preparation of complaint	4
4/26/2017	review case file; factual investigation of dasher position and doordash business model	3
4/27/2017	review case file; factual investigation of dasher position and doordash business model	5
4/28/2017	receipt of signed retainer from Daniel Marko	0.2
4/28/2017	assignment of tasks; roundtable next steps with firm as to projects for case	1
4/28/2017	discuss complaint with Yoel Hanohov	2
4/28/2017	research possible venues for filing of complaint; discuss with Todd Friedman	3
4/28/2017	discuss complaint with Yoel Hanohov; review and revise draft	4.5

4/29/2017	discuss complaint with Yoel Hanohov; review and revise draft	6.8
4/30/2017	discuss complaint with Yoel Hanohov; review and revise draft	5
5/1/2017	final review of draft and discussions with Yoel Hanohov; diary follow up assignments in system, comprehensive overview of documents received from client and legal background for finalizing complaint	6
5/1/2017	review/revise PAGA notice letter; discuss case with Yoel Hanohov	1.3
5/1/2017	call with Todd Friedman re case status	0.5
5/5/2017	check on status of filing and PAGA submission ensure everything on track	1
5/9/2017	receipt of and filing of proof of service	0.8
5/15/2017	call with defense counsel on early discussion of case	0.7
5/17/2017	review case file; discuss with Yoel and Todd	1
5/17/2017	review assignment of courtroom, review for standing order or other judge procedures	1
5/25/2017	review notices of appearance	0.3
6/7/2017	call with defense counsel re Marciano I	0.5
6/7/2017	emails with clients re class settlement	0.2
6/7/2017	call with new client Jesse Corona; request documents	1.2
6/7/2017	discuss impact of Marciano case with clients; weigh opt out/objection options	2
6/8/2017	discuss case with both clients, gather information for purposes of damages analysis of their potential claims both for litigation, and settlement purposes	2.5
6/8/2017	memo to file re damages issues and merits of claims	3
6/8/2017	review Marciano I case information in detail, discuss with Yoel Hanohov	4.5
6/9/2017	review Marciano I case information in detail, discuss with Yoel Hanohov	3
6/9/2017	call with Todd Friedman re overlapping settlement	1
6/9/2017	prepare retainer agreement for Jesse Corona; open new file, and calendar PAGA letter and amendment to existing complaint	2.5
6/9/2017	receipt of documents; review	3
6/12/2017	discuss case with new client Brock Baker	1.5
6/16/2017	draft retainer for Brock Baker; update file and assign new tasks and set and calendar deadlines for PAGA letter and amended complaint	2.3
6/16/2017	receipt of signed retainer from Brock Baker	0.2
6/30/2017	review initial case management order; calendar deadlines	1.5
6/30/2017	case file review check on status of filings and discuss with todd friedman	1.2
7/6/2017	serve initial case management order on defense	0.3
7/13/2017	Emails with defense re cmc	0.3
7/13/2017	call and emails with clients	1
7/14/2017	Emails with defense re cmc	0.3
7/17/2017	draft initial CMC statement; coordinate with defense; review initial CMC order and case file	4

7/17/2017	discuss case with todd friedman	0.5
7/18/2017	further revisions to CMC statement; emails with defense and review redlines back and forth; coordinate finalization and filing as well as service of the CMC statement	3.5
7/18/2017	review Marciano I class notice; pull class notice documents, analyze overlap with ongoing case and impact on clients and class members	5.5
7/25/2017	review notice of related cases; review case file for related case familiarize self with matter before CMC	5
7/25/2017	case file review; prep for hearing	2.5
7/26/2017	prepare for and attend initial CMC; notes to file and update firm calendar	3
7/26/2017	call with Todd Friedman re strategy and case assignments	0.8
7/26/2017	review minute order; case file review, update firm calendar	0.4
7/31/2017	set up case anywhere	0.3
8/1/2017	review case anywhere order	0.2
8/8/2017	extensive interviews and discussions with new potential class representatives; discuss duties and legal claims; gather documents and information for case file	5.5
8/14/2017	case file review; work on amended complaint and additional PAGA notices; update firm calendar	3.3
8/15/2017	review Doordash press release; discuss case status with Todd Friedman and impact of settlement	0.5
8/15/2017	call with clients re case status	1.5
8/15/2017	review emails from clients re case	0.5
8/15/2017	draft amended complaint; add new plaintiffs and PAGA claim	4
8/15/2017	add Brock Baker to case file; review client documents and update file for additional plaintiff	3
8/16/2017	finalize and file and serve amended complaint	6
8/22/2017	review conformed copy of amended complaint; calendar response deadline	0.5
8/25/2017	call with Todd Friedman	0.5
8/25/2017	call with Yoel Hanohov	0.5
8/25/2017	review entirety of Marciano I and Kissner actions dockets; notes for outline	5
8/28/2017	legal research and extensive analysis on impact of McGill v Citibank; research public injunctive relief claims in the context of wage and hour and employment issues and California public policy questions	6.5
8/29/2017	extensive review of Marciano settlement agreement; outline various issues in the settlement and assign research projects to Yoel Hanohov	7.2
8/30/2017	extensive discussions with clients for purposes of Kullar analysis and preparing declarations; discuss possible objection/opt out avenues to Marciano I and impact on their ongoing claims in Marko action; strategy discussions	3

8/30/2017	prepare kullar analysis to compare to valuation proffered in Marciano I; legal research re valuation methods	6.5
8/30/2017	legal research re claims; discussions with Yoel Hanohov re brief	5.5
8/31/2017	review progress of Brief, heavy revisions; discussion with Yoel Hanohov and additional legal research project assignment	6.8
8/31/2017	draft client declarations	3
9/1/2017	discuss status of brief with Todd Friedman	0.5
9/1/2017	further revisions to brief; discussions with Yoel Hanohov	5.5
9/2/2017	finalize declarations of clients; phone calls with all three clients	2
9/2/2017	review additional legal research; further discussions with Yoel Hanohov re further modifications to draft	3.5
9/3/2017	further revisions to draft of brief	5.5
9/4/2017	call with Todd Friedman	0.5
9/4/2017	further revisions to draft of brief and declarations and supporting evidence	4
9/4/2017	discuss status with Yoel Hanohov	0.3
9/5/2017	final review of draft brief, assist in assembling final product for filing	2
9/9/2017	review memorandum of points re motion to compel arbitration and accompanying declarations; begin outline of issues for response; legal research re same	6.8
9/10/2017	review memorandum of points re motion to compel arbitration and accompanying declarations; begin outline of issues for response; legal research re same	7.5
9/12/2017	review reply brief of Marciano re objection; discussion with Yoel and Todd Friedman	4.5
9/12/2017	review LWDA submission regarding final approval	2
9/12/2017	review declaration of Doordash re final approval	1.5
9/12/2017	prepare for hearing	2.5
9/13/2017	review notice of related cases	0.3
9/13/2017	prepare for and attend hearing on final approval, oral argument in support of objectors; debrief Yoel and Todd after; notes to file	5
9/16/2017	discussion with Yoel and Todd re case strategy	0.2
9/20/2017	file notice of appearance	0.3
9/20/2017	call with clients re case status	1
9/20/2017	emails with clients; review Marciano I class notice; further investigation into case and any potential impact on claims of absent class members and plaintiffs in Marko action	3.6
9/20/2017	call with Todd Friedman re strategy for protecting class and long-term implications/strategy of potential for intervention and/or objection	1
9/24/2017	Draft opposition to motion to compel	6.8
9/25/2017	Draft opposition to motion to compel	7.8
9/26/2017	call with Todd Friedman re case status	0.8
9/26/2017	review motion to compel materials, draft opposition	5

9/27/2017	Draft opposition to motion to compel	7
9/27/2017	discuss filing with clients; discuss arbitration clause; factual investigation of potential defenses to motion	2.4
9/28/2017	research public injunctive relief; factual review of motion to compel and arbitration agreement; begin outline of opposition brief	6.5
9/29/2017	Draft opposition to motion to compel	6.8
9/30/2017	Draft opposition to motion to compel	6
10/1/2017	Draft opposition to motion to compel	7.2
10/1/2017	emails with Yoel re PAGA notice and motion to compel	0.5
10/2/2017	Draft request for judicial notice; pull documents re same; review case file and Motion to compel; further revisions to draft	6.6
10/2/2017	call with Todd Friedman re strategy and motion	1
10/2/2017	review and approve supplemental PAGA notices for clients; discuss with Yoel	1
10/3/2017	finalize, file and serve draft motion to compel opposition brief and accompanying materials	6.5
10/11/2017	review court minute order; update firm calendar	0.5
10/11/2017	discuss case status with firm	0.5
10/13/2017	extensive lengthy call with new dashers; initiate outreach campaign for clients and witnesses	2.5
10/13/2017	call with Todd Friedman re case strategy and marketing possibilities	2
10/13/2017	receipt of and review of reply brief filed by doordash; notes on same for oral argument	5.2
10/17/2017	review minute order; case file review, update firm calendar	0.2
10/25/2017	investigation into new factual and legal claims to be added to case	4
10/25/2017	coordinate schedule with Erika for upcoming dasher meeting with large number of dashers	1
10/25/2017	emails with dashers to set up meeting	0.3
10/30/2017	open new client files for large number of dashers; calendar deadlines; discussion with Todd Friedman and staff	4.5
10/30/2017	draft retainers for new clients	2
11/1/2017	emails with PNCs re new claims and witness testimony	0.5
11/10/2017	calls and emails with new clients	1
11/11/2017	coordinate with dashers for next week's meeting	0.2
11/15/2017	travel to woodland hills for all day in person meeting with numerous dashers regarding their role as plaintiffs and witnesses in the doordash case; extensive notes on experiences and set up dropbox account for their provision of electronic documentation; receipt of extensive documentation at meeting and notes to file; draft memo to file of findings upon return	11.5
11/16/2017	further receipt of documents, recordings, and other evidence; calls with dashers re same	7

11/16/2017	discuss case status and evidentiary findings and status of outreach with Todd	1.5
11/17/2017	further receipt of documents, recordings, and other evidence; calls with dashers re same	6.5
11/18/2017	further receipt of documents, recordings, and other evidence; calls with dashers re same	8.2
11/22/2017	further receipt of documents, recordings, and other evidence; calls with dashers re same	5.5
11/30/2017	Calls with clients re case status and strategy	2.5
12/5/2017	calls with additional dashers interested in discussing case	1
12/6/2017	review case docket and message board	0.6
12/6/2017	calls with additional dashers interested in discussing case	1
12/6/2017	further receipt of documents, recordings, and other evidence; calls with dashers re same	6
12/6/2017	Calls with clients re case status and strategy	2
12/9/2017	Calls with clients re case status and strategy	2.2
12/10/2017	further receipt of documents, recordings, and other evidence; calls with dashers re same	3.5
12/13/2017	review minute order	0.3
12/15/2017	Calls with clients re case status and strategy	1.7
12/15/2017	discuss case status and evidentiary findings and status of outreach with Todd	2
1/4/2018	call and emails with clients re case status	3
1/5/2018	emails with client	0.3
1/10/2018	review case anywhere postings; check calendar for availability	0.5
1/18/2018	review case anywhere postings; review case history; update file	1
1/19/2018	review minute order	0.2
1/24/2018	emails with Marciano counsel	0.3
1/24/2018	call with Todd friedman re Marciano	0.5
1/25/2018	review minute order	0.2
1/26/2018	emails with Marciano counsel	0.5
1/26/2018	call with Shannon Liss-Riordan; notes to file re same	0.5
1/26/2018	discuss case with Todd Friedman	0.5
1/26/2018	emails with defense and todd re case management	0.6
1/26/2018	review case anywhere postings	0.2
1/31/2018	call on doordash with defense counsel; memo to file re same	0.6
1/31/2018	call with Todd Friedman re case status	0.5
1/31/2018	call clients to present individual settlement offer from Doordash; discuss options	1.2
2/7/2018	emails with Marciano counsel	0.5
2/7/2018	update firm calendar regarding deadlines	0.3
2/7/2018	emails with firm re scheduling and assignment of projects	0.3

2/8/2018	emails with Marciano counsel	0.5
2/8/2018	emails with firm re scheduling and assignment of projects	0.3
2/13/2018	calls and emails with clients re case status	1
2/13/2018	investigation into security measures and scam attack update sent to dashers by doordash; memo to file on implications to merits of case and possible additional claims	3.5
2/13/2018	emails with counsel re briefing schedule	0.3
2/14/2018	review supplemental papers filed in Marciano matter; begin legal research; assign projects to other members of firm; discuss with Todd Friedman	4
2/15/2018	further review of Marciano filings; begin outline of draft response	5
2/15/2018	assignment of projects to Yoel Hanohov	1
2/15/2018	call with Todd Friedman	0.5
2/15/2018	review court order re motion to compel; discussion with Todd Friedman	1.2
2/16/2018	discuss case with clients, gather additional information for response	2.5
2/16/2018	review sandquist case; review of arbitration agreement; notes re same and begin outline of brief	5
2/17/2018	legal research re sandquist case; keycite of case and search for related authority	3.5
2/18/2018	further drafting of supplemental brief	5.8
2/19/2018	draft supplemental brief	6.5
2/23/2018	review minute order; update case file and calendar	0.4
2/25/2018	discuss case status with clients; draft supplemental brief	4.5
2/26/2018	revise draft of supplemental brief; discuss with Todd Friedman	5.5
2/22/2018	calls with clients to update them on case progress	1
3/3/2018	discussion with Yoel Hanohov; review/revise notice of errata	1
3/4/2018	approve notice of errata for filing	0.5
3/7/2018	revisions to supplemental brief	4.5
3/9/2018	finalize and file and post supplemental brief	6.2
3/10/2018	receipt of Defendant's supplemental brief; review and discuss with Todd; notes to file regarding issues for oral argument	4.5
3/14/2018	extensive discussion with Todd Friedman re case status	1
3/14/2018	call with Marko re case status	0.5
3/16/2018	call with Yoel re case status and new projects	1
3/16/2018	emails re case strategy and status	0.5
3/17/2018	receipt of supplemental brief from Marciano and declaration and evidence in support thereof; review and notes to file	6
3/17/2018	receipt of supplemental brief from Doordash; review and notes to file	4.5
3/17/2018	assignment of tasks; firm discussion with Todd and Yoel re next steps and case strategy	2.8
3/18/2018	further review of briefs; begin outline of response; discussions with Todd and Yoel	7

3/18/2018	emails with defense re redactions on filings	0.2
3/19/2018	legal research on redactions of settlement-related documents in court record in class action settlement context; research issue of whether class counsel and defendant can redact information that factored into settlement justification and valuation from the review of class members	5.5
3/19/2018	emails with defense re redactions on filings	0.5
3/19/2018	emails with defense counsel re settlement issues	0.4
3/19/2018	calls and emails with Todd and Yoel	1.2
3/20/2018	prepare for hearing in Marciano	6.5
3/21/2018	prepare for hearing in Marciano	6.5
3/21/2018	review filing re appointed reporter and minute order; update file	0.4
3/22/2018	prepare for and attend hearing in Marciano	3
3/22/2018	call with Todd Friedman and Yoel H re hearing	0.5
3/27/2018	calls with clients to update on case status	1
3/27/2018	draft supplemental objection papers; declarations re same	9.2
3/28/2018	further drafting of supplemental objection papers	9.2
3/28/2018	discuss assignments with Yoel	1
3/28/2018	emails with firm regarding legal doctrines relating to case and possible legal research avenues	0.5
3/29/2018	draft supplemental objection papers; declarations re same	8.8
3/29/2018	call with Todd Friedman	0.7
3/30/2018	extensive revisions to draft brief; discussions with Todd and Yoel	12
3/31/2018	review filed draft; emails with Yoel re errata	1
4/1/2018	emails with defense counsel	0.2
4/2/2018	discuss case status with Yoel	0.2
4/9/2018	call with Todd Friedman re case strategy and status	1
4/9/2018	receipt of reply brief; review and notes to file	4
4/10/2018	prepare notes for hearing; extensive email and phone discussions with Todd and Yoel	4
4/12/2018	calls and emails with clients re case status	1.8
4/12/2018	investigation of social media accounts of Doordash for marketing of dasher position to new recruits, including #whyidash campaign; analysis of deceptive practices regarding representations made surrounding compensation structure; notes to file for merits of claim and damages issues	4.5
4/12/2018	emails with defense re filings	0.2
4/13/2018	assign Yoel Hanohov legal research project	0.3
4/13/2018	review new DOL opinions; assign research project to Mordechai; review memo; further research; emails to firm re impact on case	3.8
4/14/2018	Discuss findings of legal research project with Yoel Hanohov	1.2
4/18/2018	emails with Yoel re supplemental authority notice	0.3

4/18/2018	Extensive preparation for Marciano I hearing on final approval; calls with Yoel and Todd re same	7
4/19/2018	prepare for and attend Marciano I hearing on final approval; oral argument; debrief Todd and Yoel after hearing; notes to file and strategy meeting	5
4/19/2018	review minute order; discuss with Todd Friedman	0.7
4/20/2018	review research findings regarding appellate procedure and rules of court	2
4/20/2018	emails with Yoel and Todd re case strategy	0.8
4/23/2018	review notice of lodging and proposed order submitted by doordash on motion to compel arbitration	1
4/26/2018	draft and file opposition to order granting in part motion to compel	2.5
4/26/2018	emails with Bianca re ordering transcript of hearing	0.3
4/26/2018	review objection by doordash to opposition	1.2
4/30/2018	review court order on motion to compel arbitration; update case file and calendar future projects and deadlines	1.2
4/30/2018	call with todd friedman	0.5
4/30/2018	pull Dynamex decision; thorough review; email to firm regarding extensive overview of case and impacts on Doordash	4
5/1/2018	Analysis of Dynamex and its impact on misclassification in California	8
5/2/2018	Analysis of Dynamex and its impact on misclassification in California	8
5/3/2018	Strategy discussions with Todd, Yoel Mordechai and Tom regarding impact of decision on Doordash case and how this changes the strategy of the rest of litigation on the case	4
5/7/2018	emails with Yoel and Todd	0.2
5/9/2018	emails re appeal and transcript of proceedings;	0.2
5/10/2018	emails re proposed judgment and strategy	0.3
5/18/2018	emails with firm re appeal and case status	0.3
5/29/2018	review order granting motion to compel	0.3
5/30/2018	emails with firm re appeal and case status	0.3
5/30/2018	review CMC order; update calendar	0.4
6/7/2018	notice of entry of judgment	0.5
6/20/2018	extensive discussion of case with Brock Baker; discuss resolution/dropping of claims; phone call and emails re same	2
6/25/2018	calls and emails with clients re case status	1
6/25/2018	investigation of new Fast Pay feature; review website and social media accounts of Doordash for more factual detail on program; analysis of whether this feature could qualify as 2802 damage; discussion roundtable with Todd and Tom re same	5.8
7/2/2018	call with brock baker	1
7/2/2018	emails with firm re appeal and case status	0.3

7/9/2018	draft proposed stipulation and order lifting stay for limited purpose of dismissing brock baker as plaintiff in action; coordinate with defense; file and serve	2
7/10/2018	emails with firm re case status; review filings by Doordash	0.6
7/17/2018	call with client; receipts of emails and information regarding claims	1
7/17/2018	extensive factual review of deactivation policy; policy and practice regarding updates to terms and conditions for dashers; unilateral decisions of doordash in creating new policies; practices regarding notification of changes; and other related issues; analysis of legal and factual issues pertinent to misclassification as well as damages issues	9.5
7/18/2018	further analysis of deactivation issue; notes from interviews with deactivated dashers	6.5
7/18/2018	extensive discussion with Todd and Tom re deactivation policy and impact on merits of the claims; roundtable issues and further review	3
7/18/2018	review CMC order; update calendar	0.4
7/19/2018	review notice of appearance	0.2
7/25/2018	emails with firm re case status; review filings by Doordash	0.6
7/25/2018	review and approve notice of appeal	0.4
8/1/2018	review notice of related cases; assign tasks to Mordechai	0.3
8/2/2018	review results of Mordechai project	2.5
8/6/2018	review designation of record on appeal; discuss with Erika and Todd	0.8
8/6/2018	emails with Todd; review notice of designation of record	0.5
8/7/2018	emails with defense; update rest of firm on defense email	0.2
8/8/2018	emails with firm re court of appeal voicemail and filing issues; review filing error	0.5
8/9/2018	emails re appeal and designation of record; review case file and appellate and objection record	1.3
8/9/2018	emails with yoel and todd re appeal and case status	0.5
8/9/2018	review designation of record; add additional documents and filings	2.5
8/13/2018	emails with attorneys at firm re appellate status	0.4
8/13/2018	designate appendix; discuss new case assignment with Mordechai	3
8/13/2018	review record of Marciano I for purposes of appeal	2
8/13/2018	emails regarding case status and strategy; findings of research project	2
8/14/2018	begin draft of amended notice to designate	1.5
8/14/2018	extensive review of new facts from client regarding experiences as dasher and potential new claims; review account of experience, documents, calls and emails with client; legal research re new issue	6
8/15/2018	firm discussion regarding new potential claims for case on behalf of dashers	2.5
8/16/2018	review notices of related cases and pull operative pleadings from each, compare overlap in claims, class members and class periods to Marko action	4.5

8/19/2018	phone call and emails with potential additional dasher representatives; document review; open case file	2.5
8/21/2018	emails and calls with Mordechai and Erika re appeal	0.7
8/21/2018	receipt of voluminous documents and information from clients re case	6
8/21/2018	prepare notice of lodgment; assist with filing	2
8/16/2018	review additional notices of related cases and pull operative pleadings from each, compare overlap in claims, class members and class periods to Marko action	3.5
8/22/2018	discussions with class member dashers re case progress and gathering of information for investigation	4.2
8/23/2018	calls with clients re case status	1
8/23/2018	investigation into Doordash valuation; financial status; identity of investors; and other related issues for purposes	6
8/24/2018	review documents and information provided by dashers	7.2
8/27/2018	lengthy call with client re new potential claims; review police report, video, recordings, documentation and lengthy account of events; analysis of Doordash exposure under new legal claims	6
8/29/2018	review amended notice of designation of record and attachments; emails re same	1
8/30/2018	firm roundtable discussion re new potential claims	0.8
8/30/2018	discuss potential claims with dashers, including both clients and witnesses; further factual investigation into case	3.5
8/31/2018	review amended notice of designation of record and attachments; emails re same	1
9/5/2018	receipt of additional documents and information from clients; review evidence	4.2
9/6/2018	calls with clients re case status	1.3
9/6/2018	conduct investigation into user-research feature of doordash; use of surveys with former dashers as marketing tool and potential evidentiary issues for purposes of certification, merits and damages; memo to file re discovery	7.5
9/7/2018	review CMC order; update calendar	0.4
9/10/2018	emails re appeal and future deadlines	0.3
9/11/2018	emails re appeal and future deadlines	0.3
9/14/2018	emails and calls with client	1
9/14/2018	receipt of updated retainer; review case file and update notes	1.4
9/15/2018	discuss new dasher updates with clients	1
9/15/2018	investigate new updates to dasher portal; memo to file re findings	4.5
9/15/2018	roundtable findings of revisions to dasher model with firm; discuss impact on case	0.8
9/19/2018	receipt of proposed scheduling order from Judge Phillips; calendar in firm files; discuss deadlines and assignment of tasks to associates with Todd	2.5

9/20/2018	review scheduling order with Phillips ADR for corona arbitration; update firm schedule, comprehensive overview of file; create tasks lists for upcoming litigation; assign projects to Mordechai, Kelsey and Tom Wheeler; discuss with firm	4.5
9/20/2018	receipt of voluminous documentation from clients; review same	4.5
9/20/2018	call with client re experiences; notes to file for later use	2.5
9/21/2018	case file review; analysis of future projects and discuss with Todd and Erika assignment of tasks	3
9/24/2018	discussions with class member dashers re case progress and gathering of information for investigation	4
9/25/2018	review motion to dismiss appeal filed by Marciano	3
9/25/2018	extensive emails with firm re appellate status and motion; litigation strategy	1.5
9/25/2018	call with defense counsel re potential mediation and settlement issues; comprehensive file review to prepare for call; debrief with Todd afterwards	2.5
9/27/2018	review findings of Tom on research project; discussion with firm	2
9/28/2018	case file review; begin draft of complaint on new dashers' case	7
9/28/2018	emails with firm re case status	0.3
9/28/2018	discuss proposed scheduling order with doordash in Marko action	1
10/1/2018	review proposed scheduling order; emails re same	0.5
10/1/2018	emails with firm re intervention and appeal issues	1
10/2/2018	comprehensive file overview of case status and arbitration statuses	3
10/2/2018	emails with arbitrator	0.2
10/2/2018	discuss new complaint and PAGA issues with Mordechai	1.5
10/2/2018	case file review; call with Todd Friedman re status of case and future projects	2
10/3/2018	discuss new claims for dashers with firm	0.5
10/4/2018	emails with arbitrator	0.2
10/8/2018	draft joint status report; emails re same; comprehensive case file overview	2
10/10/2018	review minute order	0.2
10/10/2018	review notice of association	0.2
10/11/2018	emails with firm re project status	0.3
10/12/2018	review status of various cases for dashers; update calendar; discussion with Erika	2
10/12/2018	review minute order	0.2
10/17/2018	confirm filing of joint status report; update file re same	0.3
10/17/2018	review notice of appearance	0.2
10/26/2018	review transcripts of proceedings	2
10/26/2018	emails with firm re status of motions and other projects	0.4
11/2/2018	receipt of letter of representation; update file	0.8

11/2/2018	call with Jesse Corona re case status and termination issues; extensive interview regarding circumstances; investigate Doordash termination policies; memo to file re misclassification implications for right to hire and fire at will	6.5
11/20/2018	emails with mordechai re future projects	1
11/20/2018	case file review; discuss status with Todd Friedman	2.5
11/30/2018	discuss brief with Tom Wheeler	2
11/30/2018	call with Todd Friedman re case status	1
11/30/2018	review and revise intervention and motion to vacate packet; redline all briefs and accompanying documents; review case file and research	5.5
12/1/2018	review and revise intervention and motion to vacate packet; redline all briefs and accompanying documents	7.5
12/2/2018	draft declaration in support of motion; review exhibits	3
12/3/2018	review and approve final draft for filing	4
12/12/2018	review correspondence from defense	0.2
12/12/2018	discuss case with Todd Friedman	1
12/12/2018	emails internally and externally re scheduling	0.5
12/13/2018	emails with defense	0.1
12/14/2018	emails with defense re arbitration and other related case management issues; emails with arbitrator re same	0.4
12/17/2018	review Marciano Brief; discuss with Todd Friedman	5
12/17/2018	discuss legal question with Todd and Meghan George	0.5
12/18/2018	legal research on procedural question	3
12/18/2018	call with defense counsel	1
12/18/2018	emails re Marciano appeal	1.5
12/19/2018	legal research on procedural question	3.5
12/18/2018	emails re Marciano appeal	1.5
12/20/2018	prepare for and attend initial arbitration call with Judge Meisinger; notes to file re same	3.5
12/20/2018	call with Todd Friedman	0.5
12/28/2018	additional research into procedural issues	3
12/29/2018	update clients on case status	1
12/31/2018	call with Todd Friedman re strategy	1
12/31/2018	emails re intervention with firm	0.5
1/9/2019	discuss case status with firm; update all calendars; case file overview	1.2
1/9/2019	mediation call with defense counsel	1
1/9/2019	research potential mediators for mediation with Doordash	0.6
1/9/2019	phone call with todd friedman	0.5
1/9/2019	emails with firm and defense re mediation and discovery issues	1
1/10/2019	update clients on case status	2
1/10/2019	emails with defense re mediation	0.6
1/10/2019	discuss case with Todd Friedman	0.5

1/14/2019	emails with defense counsel	0.2
1/15/2019	discuss case with Todd Friedman	0.5
1/15/2019	call with defense counsel re mediation and discovery issues; memo to file; case file review	1.5
1/17/2019	review notice of reassignment; discuss with Todd Friedman	1
1/28/2019	emails with defense re mediation	0.4
1/28/2019	discuss case with Todd Friedman	0.5
1/29/2019	call with defense counsel re mediation and discovery issues; memo to file; case file review	1.5
1/29/2019	emails with defense re mediation	0.5
1/29/2019	research Tripper Ortman with colleagues in CELA; independent research	2
1/29/2019	discuss case with Todd Friedman	0.5
2/4/2019	emails with defense and judge phillips re mediation and scheduling issues	0.5
2/7/2019	emails with defense and Mr. Ortman's office	0.5
2/14/2019	discussion of McGill issues in case with firm	0.3
2/21/2019	emails with defense and judge phillips re mediation and scheduling issues	0.2
2/22/2019	emails with defense and judge phillips re mediation and scheduling issues	0.2
2/24/2019	emails with defense re mediation	0.3
2/25/2019	emails with defense and Mr. Ortman re mediation	0.7
2/25/2019	discuss case with Todd Friedman	0.5
2/25/2019	discuss case status with firm	0.2
2/26/2019	emails with defense and Mr. Ortman re mediation	0.4
2/26/2019	update clients on mediation date	1
2/27/2019	emails with defense and Mr. Ortman re mediation	0.4
3/1/2019	review proposed scheduling order in Corona arbitration; emails with defense re same; update firm calendar	2.8
3/6/2019	emails with defense and Mr. Ortman re mediation	0.5
3/7/2019	call with Todd Friedman re upcoming mediation; strategy and next steps	1.5
3/7/2019	emails with mediator	0.2
3/7/2019	receipt of mediation invoice and mediator's procedures; review and discuss with Todd	1.2
3/7/2019	discuss case status with firm; review case file organize list of next projects for series of calls over following days	1.5
3/10/2019	discuss case status with firm	0.2
3/11/2019	discuss case status with firm	0.2
3/11/2019	emails with defense and arbitrators re scheduling and mediation issues	0.5
3/12/2019	discuss case status with firm	0.2
3/13/2019	review proposed scheduling order in Marko arbitration; emails with defense re same; update firm calendar	2.5
3/14/2019	emails with arbitrator and defense	0.5
3/15/2019	emails with defense re additional revisions to proposed scheduling orders in marko and corona arbitrations; revisions re same	1

3/18/2019	review marko and corona doordash arbitration files and calendars, emails with todd re revised scheduling order; discussion with kelsey and mordechai; review case file to assign next series of tasks to associates	2
3/18/2019	emails with arbitrator and defense	0.5
3/21/2019	calls and emails with clients re case status	1
3/27/2019	emails with arbitrator and defense; review updated scheduling order	0.5
3/28/2019	call with clients re case update	1
3/28/2019	emails with defense re client inquiry	0.5
3/29/2019	emails with defense re client inquiry	0.5
4/1/2019	emails with arbitrator and defense; review proposed amended scheduling order	0.6
4/1/2019	review case file- update deadlines in file	2
4/1/2019	emails with Nadia Lotun re arbitration deadlines and client updates	0.3
4/3/2019	emails with arbitrator and defense; review proposed amended scheduling order	0.6
4/3/2019	emails with defense re mediation and discovery issues	0.3
4/3/2019	emails with arbitrator and defense; review proposed amended scheduling order; update firm calendar	2.5
4/4/2019	review PMK deposition notice; revise draft; emails and calls with Kelsey re same	2.4
4/5/2019	prepare for call with defense counsel; discuss prior to and after with Kelsey; call with defense counsel re discovery and mediation issues	1.5
4/8/2019	prepare for call with defense counsel; discuss prior to and after with Kelsey; call with defense counsel re discovery and mediation issues	1.5
4/7/2019	draft discovery to Doordash	2.5
4/8/2019	draft discovery to Doordash	6.5
4/9/2019	draft list of discovery topics; discussions with defense counsel regarding mediation scope as well as topics of investigation; comprehensive case file overview of results of investigation of dashers and discussions with witnesses and clients	5.5
4/9/2019	call with Todd Friedman	0.5
4/9/2019	call with Kelsey Kuberka	0.5
4/9/2019	assign projects to members of firm for upcoming mediation; create outline of tasks and issues, and deadlines for completion of said projects	3.5
4/9/2019	calls with dashers and clients; gather information	2.5
4/10/2019	calls with dashers and clients; gather information	5.5
4/11/2019	calls with dashers and clients; gather information	5
4/17/2019	emails re deadlines and future projects with firm	0.3
4/18/2019	call with attorneys at firm re mediation projects	1
4/24/2019	legal research on public injunctive relief	6.5
4/25/2019	draft first amended complaint; case file review; further legal and factual research into claims	5

4/26/2019	emails with Nadia Lotun re filing of first amended complaint	0.2
4/26/2019	roundtable with firm members on McGill v Citibank issues relating to Doordash case and potential public injunctive relief claims	2
4/29/2019	emails with Todd and kelsey re mediation and discovery issues	0.4
5/8/2019	emails with defense re mediation and discovery issues	0.5
5/9/2019	phone call and emails with defense re mediation and discovery issues	1.2
5/10/2019	begin deposition outline for PMK of Doordash witness on misclassification issues; confirmatory discovery for mediation; file review regarding past memos	8
5/11/2019	draft deposition outline for PMK of Doordash witness on misclassification issues; confirmatory discovery for mediation; file review regarding past memos	7.5
5/12/2019	legal research on Magana arbitration ruling; memo re impact on Marko case if any; discuss with Todd, Tom and Kelsey	4.5
5/12/2019	assign project to Kelsey to review all documents in dropbox files created by clients and speak with clients re evidence and conduct outreach	1
5/15/2019	legal and factual research into doordash practices; gig economy misclassification standards, damages issues and post-dynamex case law on all issues	5
5/16/2019	legal and factual research into doordash practices; gig economy misclassification standards, damages issues and post-dynamex case law on all issues	4
5/17/2019	legal and factual research into doordash practices; gig economy misclassification standards, damages issues and post-dynamex case law on all issues	3.5
5/20/2019	legal and factual research into doordash practices; gig economy misclassification standards, damages issues and post-dynamex case law on all issues	4.5
5/21/2019	legal and factual research into doordash practices; gig economy misclassification standards, damages issues and post-dynamex case law on all issues	6
6/3/2019	review case file; emails with Nadia Lotun; update clients on case status and provide details of upcoming mediation	0.4
6/12/2019	factual investigation of pay model algorithm; review public articles and doordash policy on website; conduct analysis of how pay model plays out with real dasher experiences regarding tip stealing issue	7
6/13/2019	factual investigation of pay model algorithm; review public articles and doordash policy on website; conduct analysis of how pay model plays out with real dasher experiences regarding tip stealing issue	7.7
6/14/2019	emails with clients re mediation	0.3
6/28/2019	review and contribute to joint CMC statement; emails with defense re same	1.2

7/1/2019	emails with clients re mediation	0.6
7/1/2019	emails with firm re upcoming mediation	1.3
7/2/2019	communications with clients about mediation	1
7/5/2019	review minute order; update firm calendar	0.5
7/10/2019	review minute order; update firm calendar	0.5
7/16/2019	receipt of conformed copy of filings	0.2
7/23/2019	communications with clients about mediation	1
7/31/2019	receipt of damages data from defendant; begin kullar analysis	5.5
7/31/2019	discuss case status with Todd and Tom	1
8/1/2019	further kullar analysis work; variations on damages models based on different legal and factual assumptions	6
8/2/2019	draft mediation brief	8.5
8/3/2019	further kullar analysis work; variations on damages models based on different legal and factual assumptions	7
8/4/2019	further kullar analysis work; variations on damages models based on different legal and factual assumptions	5.5
8/5/2019	further kullar analysis work; variations on damages models based on different legal and factual assumptions; run models for class and PAGA damages	8
8/6/2019	emails with defense re mediation	0.3
8/6/2019	calls with dashers and clients regarding upcoming mediation and damages and testimonial issues	5.5
8/7/2019	calls with dashers and clients regarding upcoming mediation and damages and testimonial issues	4.8
8/8/2019	calls with dashers and clients regarding upcoming mediation and damages and testimonial issues	6.7
8/9/2019	calls with dashers and clients regarding upcoming mediation and damages and testimonial issues	5.9
8/10/2019	calls with dashers and clients regarding upcoming mediation and damages and testimonial issues	4.5
8/11/2019	comprehensive research overview of all gig economy class certification orders and class action settlements	12.5
8/12/2019	emails with defense re mediation	0.3
8/12/2019	comprehensive research overview of all gig economy class certification orders and class action settlements	9.2
8/12/2019	assign project to bianca re upcoming mediation	0.5
8/13/2019	review results of Bianca's assignment; preparation for mediation	7.2
8/13/2019	damages analysis; legal research on gig economy settlements for comps	6
8/13/2019	meeting with Michael Hassen to discuss possible co-counsel role in doordash case for purposes of settlement	1
8/13/2019	discuss possibility of working with Michael Hassen with Todd	0.5
8/14/2019	review case file evidence for mediation	8.5

8/15/2019	call all dashers all day for additional testimonials and evidence gear up mediation; memo to file re same	8
8/15/2019	call with defense re mediation	1
8/15/2019	damages analysis	4.5
8/16/2019	memo to file of dasher experiences	5.5
8/16/2019	call all dashers all morning gear up mediation	9.5
8/17/2019	comprehensive case review of existing doordash cases; search all federal and state dockets for cases, pull case files to know scope of active lawsuits	10
8/17/2019	discuss case with Tom Wheeler assignment of projects for upcoming mediation	1
8/18/2019	call with Todd Friedman re mediation	0.5
8/18/2019	mediation prep; calls with dashers; further research	8.5
8/19/2019	prep for mediation	6.5
8/19/2019	further damages analysis work	4.2
8/20/2019	discussion with Michael Hassen re co-counsel arrangement; gather and send materials for review and consideration; discuss strategy for mediation	3.5
8/20/2019	prep for mediation	7
8/20/2019	calls with Todd Friedman re mediation	0.8
8/21/2019	prepare for mediation	7.9
8/22/2019	prepare for mediation	10.5
8/22/2019	pre-mediation discussion with Michael Hassen	0.5
8/23/2019	flight to and from San Francisco and attend full day mediation; debriefing and memo to file; discussion with clients, co-counsel, Todd Friedman, and Tom Wheeler	16.5
8/24/2019	notes to file re mediation and next steps	2
8/24/2019	discussions with Michael and Todd; strategy post mediation; debrief and discuss and consider next steps	6
8/26/2019	emails with Todd and Michael Hassen re mediation and case strategy	4
8/26/2019	discuss case status with Todd Friedman	0.5
8/26/2019	review new evidence from dashers re new doordash policies	2.5
8/27/2019	call with todd and michael re next steps	0.3
8/27/2019	call with all clients and dashers to give comprehensive update	6
8/28/2019	strategy brainstorming; review file and litigation materials	5.5
8/30/2019	Follow up with mediator; discussion with Todd Friedman	0.5
8/30/2019	review new evidence from dashers re new doordash policies	2
9/3/2019	Follow up with mediator; discussion with Todd Friedman	0.5
9/5/2019	discuss case status and future deadlines with firm; adjust calendar based on ongoing negotiation status	1.5
9/9/2019	call with Todd and michael re next steps	0.3
9/10/2019	Follow up with mediator; discussion with Todd Friedman	1

9/11/2019	Follow up with mediator; discussion with Todd Friedman	1
9/16/2019	Follow up with mediator; discussion with Todd Friedman	1
9/18/2019	call with Todd and michael re next steps	0.3
9/20/2019	Follow up with mediator; discussion with Todd Friedman	1
9/20/2019	call with Todd and michael re strategy	1.1
9/23/2019	call with Todd and michael re strategy	0.3
9/26/2019	call with Todd and michael re strategy	0.2
9/26/2019	Follow up with mediator; discussion with Todd Friedman	0.5
9/26/2019	review case law sent by mediator - analysis of applicability to doordash case; discussion with Todd and strategy issues	2
9/27/2019	review new evidence from dashers re new doordash pay model policies	2
9/30/2019	Follow up with mediator; discussion with Todd Friedman	0.5
10/1/2019	discuss necessity of potential intervention and consolidation of other ongoing cases with Todd to protect class members; review notes re same	2.5
10/7/2019	Follow up with mediator; discussion with Todd Friedman	0.5
10/10/2019	Follow up with mediator; discussion with Todd Friedman	0.5
10/12/2019	strategy call with Todd Friedman	0.7
10/13/2019	strategy call with Todd Friedman	0.8
10/15/2019	calls and emails with clients to provide update	1.5
10/16/2019	strategy call with Todd Friedman	0.6
10/17/2019	strategy call with Todd Friedman	0.4
10/18/2019	emails with Todd and Michael Hassen re mediation and case strategy	0.3
10/23/2019	review reporters transcript of hearing; case file review	2.5
10/23/2020	stipulation to consolidate case with Marciano action	0.6
10/25/2019	call with mediator	0.5
10/25/2019	emails with Todd and Michael Hassen re mediation and case strategy	0.5
10/25/2019	pull every wage and hour case currently filed against doordash; comprehensive review of all filings and make list of cases, attorneys involved, case status; notes to file re same	6
10/25/2019	calls with Todd Friedman	1
10/26/2019	pull every wage and hour case currently filed against doordash; comprehensive review of all filings and make list of cases, attorneys involved, case status; notes to file re same	5.5
10/26/2019	Phone call with Michael re case strategy and settlement issues	1.2
10/26/2019	calls with Todd Friedman	1
10/27/2019	Phone call with Michael re case strategy and settlement issues	0.7
10/27/2019	further legal analysis following call with Michael Hassen	6
10/28/2019	call with defense counsel re settlement	0.5
10/28/2019	discuss with todd friedman	1
10/28/2019	Gather materials relating to settlement issues and provide to Michael Hassen	2.8
10/28/2019	emails with Michael Hassen re litigation strategy	0.5

10/28/2019	draft ex parte application to lift stay for limited purposes	5.5
10/29/2019	Phone call with Michael re case strategy and settlement issues	1.2
10/29/2019	emails and lengthy telephone discussions with Michael Hassen and Todd Friedman re litigation strategy; case file review and legal research	4.5
10/29/2019	review preliminary draft of memorandum from Michael Hassen; discuss with Todd and Michael	4.5
10/29/2019	draft declaration in support of memorandum	4
10/29/2019	emails to other counsel in existing cases	1.6
10/29/2019	discuss case with todd friedman and review of draft proposed email to other firms before transmission	0.9
10/29/2019	Emails with firm re case strategy	1.5
10/30/2019	emails and call with Michael Hassen re case strategy and projects; legal research re same	1
10/30/2019	review and revise memorandum of points and authorities in support of motion to transfer; revisions to declaration in support thereof	6.2
10/30/2019	coordinate filing of ex parte application to be completed next day, but instruct staff to hold off on filing until green light	2
10/30/2019	call with Capstone re case issues	0.4
10/30/2019	extensive emails with counsel for other cases and defendant re coordination, ex parte and other issues	2.5
10/30/2019	call with Parris firm re case issues; pre-call preparation and notes to file	1.2
10/30/2019	call with Moss Bollinger re case issues	0.5
10/30/2019	emails with Todd and Michael re case status	0.5
10/31/2019	call with Todd re case	1
10/31/2019	call with Shannon Liss-Riordan re case	0.3
10/31/2019	emails and call with Michael Hassen re case strategy and projects; legal research re same	3
10/31/2019	emails with defense re ex parte	0.5
10/31/2019	emails with counsel re case status issues	1
10/31/2019	review case anywhere posting by court re ex parte notices	0.5
11/1/2019	call with Todd Friedman	0.7
11/1/2019	call and emails with Shannon Liss Riordan	0.5
11/1/2019	emails with todd re arbitration and case strategy issues	0.5
11/1/2019	emails with defense re arbitration and scheduling issues	0.3
11/4/2019	call with todd friedman	0.7
11/4/2019	emails and phone call with defense re ex parte and other case management issues	1.2
11/4/2019	emails with Shannon Liss Riordan	0.2
11/4/2019	emails with other plaintiff counsel	0.5
11/5/2019	Assign project to Kelsey re deposition notice	1.5
11/5/2019	call with Todd Friedman	0.5

11/5/2019	draft witness list for arbitration; discussion with witnesses if available for testimony	3.5
11/6/2019	emails re deposition notice; review draft deposition notice	3
11/6/2019	emails and multiple calls with todd re case strategy	3
11/6/2019	emails with defense re ex parte and case management issues	1
11/6/2019	emails and call with Shannon Liss Riordan	1
11/6/2019	emails and calls with defense re settlement	0.6
11/6/2019	update clients on case status	1
11/7/2019	draft joint prosecution agreement	1.5
11/7/2019	review revised fee sharing agreement; discussion with Todd and Shannon and further redlines; coordinate finalization	1.2
11/7/2019	call with Todd re case status	0.8
11/8/2019	emails with defense re scheduling	0.4
11/8/2019	call with Todd re case status	0.8
11/12/2019	emails with counsel re case status issues	0.2
11/18/2019	emails with cocounsel re case strategy	0.3
11/20/2019	extensive case search for all active lawsuits involving doordash for any wage and hour claims involving California claims; discuss possibility of bringing other firms with existing cases into settlement	7.5
11/20/2019	emails with cocounsel re settlement	0.2
11/21/2019	emails with cocounsel re settlement	1.5
11/21/2019	comprehensive review of settlement documents; review and finalize and discuss	4.2
11/21/2019	call with clients to provide update	1
11/21/2019	emails with staff re update to calendaring	0.3
11/21/2019	further review for existing cases on public docket and LWDA PAGA letters; review of every major county in California, and all federal dockets, as well as LWDA	4.5
11/22/2019	gather case materials; extensive case file review; send to Michael Hassen or review and discussion with Michael and Todd	3.5
11/22/2019	calls with Michael hassen and todd friedman	1.2
11/22/2019	extensive email communications re case status; discussion with Todd and Michael	1.8
11/22/2019	review intervention and objection papers	2.5
11/22/2019	emails re preliminary approval; review approval filings	3
11/22/2019	calls with Michael hassen and Todd Friedman bacon	1
11/26/2019	review supplemental settlement filings; emails re same	0.3
12/4/2019	investigate potential additional legal claims of dashers	4.5
12/5/2019	extensive emails with cocounsel re objectors and intervenors	2
12/5/2019	review proposed intervenors communications; discussion with Todd and Michael, and emails with cocounsel	4

12/6/2019	search for cases involving law firms and intervenors' cases; comprehensive review and search	4.3
12/7/2019	review objection of Robinson and accompanying documents; discuss with Todd Friedman	3
12/7/2019	review motion for temporary restraining order re arbitration in Abernathy case; review abernathy case docket	2.5
12/9/2019	Emails re ex parte application and case strategy	0.5
12/10/2019	review ex parte application of proposed intervenors; emails with co-counsel re same	3
12/10/2019	emails with cocounsel re ex parte hearing; review objection papers	3
12/10/2019	further investigation on proposed intervenors' cases; emails with todd and Michael re same	2
12/11/2019	review opposition to ex parte application	1
12/11/2019	emails with defense re arbitration and status issues	0.5
12/11/2019	emails with cocounsel re ex parte application	0.2
12/12/2019	emails with Todd, Michael and co-counsel re ex parte hearing and preliminary approval issues	0.5
12/12/2019	review additional intervention papers from romero plaintiff; emails with counsel re same; notes on potential response	5.5
12/13/2019	Review 9th circuit case on objections in wage and hour case; emails to cocounsel re same	0.8
12/16/2019	emails with counsel re settlement issues and court tentative ruling	1
12/16/2019	review tentative ruling and emails re same	1
12/16/2019	Call with Todd Friedman re settlement issues	0.4
12/17/2019	Emails with co-counsel re settlement issues and strategy	1
12/18/2019	emails with counsel re scheduling issues	0.4
12/18/2019	Call with Todd Friedman re settlement issues	0.4
12/18/2019	Emails with co-counsel re settlement issues and strategy	0.3
12/19/2019	emails with counsel re scheduling issues	0.3
12/19/2019	Call with Todd Friedman re settlement issues	0.4
12/19/2019	Emails with co-counsel re settlement issues and strategy	0.3
12/20/2019	emails with counsel re scheduling issues	0.3
12/27/2019	Emails with co-counsel re settlement issues and strategy	0.3
12/30/2019	discussion with Michael Hassen re intervenors and next steps	0.5
12/30/2019	Call with Todd Friedman re settlement issues	0.6
12/31/2019	review McGrath intervention motion; notes re same; legal analysis of motion	1.4
12/31/2019	emails with co-counsel re settlement and other overlapping cases	1.2
12/31/2019	call with Todd Friedman re strategy with intervention	0.8
12/31/2019	discussion of strategy issues with Shannon	0.2
1/2/2020	Emails with counsel re discussions with other plaintiff counsel	0.4
1/3/2020	discuss settlement issues with Michael Hassen	0.4

1/6/2020	discuss intervention and objectors with Todd Friedman	0.5
1/6/2020	emails with Capstone and with other counsel	0.5
1/7/2020	coordinate calls with other plaintiff firms re settlement	0.5
1/7/2020	emails with cocounsel re settlement issues	1.4
1/7/2020	review motion to intervene and Marciano case docket; calendar deadlines and comprehensive file review	3.5
1/7/2020	investigate opt out marketing campaign from other law firms poaching class members	2.5
1/7/2020	call with Todd Friedman re findings	0.5
1/9/2020	calls and emails with Capstone Law re settlement	0.9
1/9/2020	calls and emails with Aegis Law re settlement	0.6
1/9/2020	emails with cocounsel re settlement	0.5
1/9/2020	coordinate further discussions with other plaintiff firms re settlement	0.8
1/9/2020	call with Todd re case status	0.8
1/9/2020	review Rick Prieto intervention filings; notes to file	3.5
1/9/2020	call with Michael Hassen re case status	0.2
1/9/2020	extensive emails with cocounsel	0.8
1/9/2020	emails with Rick Prieto	0.2
1/9/2020	emails with Jahan Sagafi; strategy call with Todd Friedman	1.2
1/10/2020	extensive emails traffic with cocounsel, intervenors, and Todd re case status	2
1/10/2020	review opposition to motion to intervene; notes re same	1
1/10/2020	call with Todd re case status	1
1/10/2020	call with Jahan Sagafi; pre-call preparation; notes to file	1.5
1/10/2020	call with Rick Prieto; pre-call preparation; notes to file	1.5
1/13/2020	review revised motion to intervene; discussion re same	1.5
1/15/2020	extensive emails with plaintiff counsel and co-counsel	1.5
1/15/2020	call with Todd re case strategy	1
1/16/2020	discussion with Capstone re joint prosecution and settlement	0.5
1/16/2020	emails and call with todd and michael re settlement issues	0.8
1/17/2020	emails with Capstone, and co-counsel re consolidation; calls with Todd and Michael	1
1/18/2020	call with Michael and Todd re stipulations and settlement progress	0.3
1/22/2020	pull dockets of Farran and Campbell cases; case file review; emails with counsel re consolidation	0.7
1/22/2020	call with Todd Friedman	0.5
1/22/2020	review stipulation to consolidate; emails re same	0.7
1/23/2020	emails with cocounsel re consolidation and settlement progress; review filings re preliminary approval	1.6
1/23/2020	review reply in support of preliminary approval	2.5
1/23/2020	call with Todd Friedman	0.5
1/23/2020	discussion with Capstone and Todd	0.5

1/24/2020	update clients; update firm calendar	1.3
1/29/2020	review court order; emails with cocounsel re same; call with todd friedman	1.2
1/31/2020	review edits to joint prosecution agreement with Capstone; discussion of redline with Todd and Michael; emails re same; phone calls	2
2/5/2020	update clients, secure signatures on new documents	1
2/6/2020	discussion of case strategy and status with Shannon	0.2
2/11/2020	review federal court order re opt out procedures; discussion with co-counsel re same and case strategy	1.5
2/13/2020	emails with court and counsel re intervention issues and new hearing; emails with todd and erika re same	0.6
2/14/2020	emails with court and counsel re intervention issues and new hearing; emails with todd and erika re same	0.6
2/14/2020	review attachments to emails re motion to intervene	2.5
2/18/2020	call with todd friedman re settlement issues	0.5
2/18/2020	emails with capstone and cocounsel re settlement issues	0.3
2/18/2020	emails with counsel re hearing date; case file review	0.9
2/18/2020	call with clients provide update	0.6
2/20/2020	call with clients provide update	0.6
2/25/2020	emails with capstone and cocounsel re settlement issues	0.3
2/28/2020	Emails re case strategy and settlement	0.4
3/4/2020	update calendar and comprehensive file review	1.5
3/10/2020	discuss case status with clients	1
3/17/2020	emails with court and cocounsel	0.3
3/17/2020	call with todd friedman	0.5
3/24/2020	discuss case status with clients	1
3/26/2020	review notice of motion to withdraw intervention; discussion with cocounsel	0.6
3/27/2020	call with clients to update on status	1
4/13/2020	emails with cocounsel re settlement issues	0.3
4/14/2020	emails with cocounsel re settlement issues	0.3
4/14/2020	call with Todd Friedman	0.8
4/14/2020	review objections and case file further	2
4/21/2020	emails with Capstone; receipt of signed JPA	0.3
4/24/2020	review tentative ruling; discussion with Todd and Shannon	2.5
4/24/2020	discuss strategy with Michael Hassen	1
4/29/2020	further discussion with Todd re tentative ruling	0.6
4/29/2020	emails with cocounsel re tentative ruling	0.2
4/30/2020	emails with cocounsel re tentative ruling	0.2
5/9/2020	call with clients to update on status	1
5/11/2020	emails with cocounsel re tentative ruling	0.5
5/15/2020	emails with cocounsel re tentative ruling	0.2

5/15/2020	call with Todd Friedman	0.5
5/21/2020	emails with counsel and court re intervention	0.2
5/22/2020	review supplemental brief; factual and legal research and case review; emails with counsel re same	2.7
5/22/2020	call with Todd Friedman	0.4
6/1/2020	discussion of intervention and settlement issues with cocounsel	0.8
6/2/2020	thorough review of revised settlement agreement; emails with co-counsel re same	5.2
6/2/2020	review new filings by intervenors; discussion re same	0.8
6/2/2020	call with clients update on case status, discuss revised settlement agreement and timing of next steps	2
6/3/2020	emails with cocounsel re settlement issues	1
6/3/2020	calls with clients re settlement	0.6
6/3/2020	call with Todd Friedman	0.4
6/4/2020	emails with cocounsel re settlement	0.4
6/4/2020	discuss settlement with Capstone; coordinate signatures from their clients and declarations as well as timing of anticipated supplemental approval filings	0.8
6/4/2020	call with Todd Friedman	0.3
6/4/2020	call with clients	0.4
6/4/2020	extensive emails and calls with plaintiff counsel re settlement approval status	1
6/4/2020	review declaration of Lowe; coordinate finalization of declaration	0.5
6/4/2020	draft declarations of Marko and Corona; emails with cocounsel re same	3
6/5/2020	extensive emails and calls with plaintiff counsel re settlement approval status	1.2
6/5/2020	coordinate getting signatures from clients on declarations and settlement documents; emails and calls re same; emails with co-counsel re settlement progress	2
6/5/2020	coordinate revisions to declaration of Lowe	0.4
6/5/2020	review approval docs and thorough case file review for upcoming filing	4.5
6/6/2020	extensive emails and calls with plaintiff counsel re settlement approval status	1.5
6/6/2020	revisions to declarations for clients; send revised declaration for signature; discussions with clients re changes and case status	2
6/6/2020	call with clients to update on status	1
6/7/2020	follow up with clients for signatures	0.5
6/7/2020	emails with cocounsel re settlement and intervention issues	0.3
6/8/2020	emails with clients and Nadia Lotun re declarations for signature	0.3
6/8/2020	finalize and secure signatures from clients on approval documents.	0.8

6/8/2020	extensive emails with cocounsel, capstone, and other plaintiffs counsel regarding settlement agreement, approval documents and revisions; review approval docs for filing	5.4
6/8/2020	call with Todd Friedman	0.5
6/9/2020	emails with Lauren; review recent filings	1.5
6/16/2020	review filings; emails re same	0.2
6/17/2020	emails re settlement issues and case status	0.3
6/18/2020	emails with court and counsel; review supplemental authority from proposed intervenors	1.5
6/18/2020	review supplemental authority, strategy discussion	1
6/19/2020	review case docket in McGrath action	2
6/19/2020	email and phone discussion with todd friedman, michael hassan, co-counsel and defense counsel re status of intervention, tentative rulings and other settlement and approval related issues	3
6/19/2020	review statement of decision	1
6/19/2020	emails with court and counsel re approval	0.2
6/22/2020	emails with cocounsel re upcoming hearing	0.2
6/23/2020	emails with cocounsel re hearing and further settlement issues	0.5
6/26/2020	review proposed order of intervenors; emails re same with cocounsel	0.6
6/29/2020	emails with counsel and court	0.4
7/7/2020	extensive strategy emails with cocounsel re case status and further objectors and intervenors	1.5
7/7/2020	call with Caleb Marker; notes to file re discussion	0.8
7/7/2020	case file review, review objector and intervenor case files and filed papers	2.5
7/7/2020	call with Todd Friedman	1
7/7/2020	call with clients to update on status	1
7/7/2020	call with Todd Friedman	1
7/14/2020	discussions with Shannon re case strategy	1
7/14/2020	extensive email traffic with cocounsel and intervenors	1
7/14/2020	call with Todd Friedman	1
7/15/2020	call with Joel Tidrick; notes to file; pre-call prep	1
7/15/2020	call with Todd Friedman	0.6
7/15/2020	emails with Shannon re case status	0.3
7/16/2020	emails with co-counsel and with objectors	0.5
7/17/2020	emails with cocounsel re case strategy and status	0.5
7/21/2020	emails with intervenors	0.2
7/21/2020	calls with clients to provide status update	1
7/21/2020	extensive email dialogue with cocounsel re case status and strategy issues as well as preliminary approval status	2.5
7/21/2020	case file review;	0.6
7/22/2020	extensive email dialogue with cocounsel re case status and strategy issues as well as preliminary approval status	2.5

7/22/2020	emails with intervenors	0.2
7/22/2020	emails re revisions to settlement agreement and preliminary approval docs	0.5
7/24/2020	review revised settlement release and accompanying documents; discussion with co-counsel, todd and clients; facilitate gathering signatures from clients and other plaintiffs	5.5
7/24/2020	calls with clients re settlement and case status	1
7/25/2020	review preliminary approval filings; discussion with Todd re case strategy and status	4
7/28/2020	emails with firm re case status	0.4
8/6/2020	call with clients to update on status	1
8/13/2020	emails with firm re case status	0.4
8/20/2020	review supplemental filing of objectors; emails with firm re same	3
9/1/2020	review order denying preliminary approval; strategy discussion with cocounsel re same	4
9/2/2020	call with clients to update on status	1
9/2/2020	call with Todd Friedman	1
9/2/2020	strategy discussions with cocounsel re further settlement negotiation strategy	2
9/9/2020	strategy discussions with cocounsel re further settlement negotiation strategy	0.4
9/22/2020	strategy discussions with cocounsel re further settlement negotiation strategy	0.3
9/23/2020	strategy discussions with cocounsel re further settlement negotiation strategy	0.4
9/23/2020	review calendar and update based on request for continuance of deadlines	0.3
9/24/2020	emails re mediation and settlement negotiations	0.5
9/28/2020	coordinate filing of status report with defense	0.5
9/29/2020	review minute order; update firm calendar	0.5
9/30/2020	review stipulation to revise briefing schedule; update firm calendar	0.5
10/7/2020	emails with cocounsel re settlement	0.2
10/7/2020	discussions with dasher class members	1
10/8/2020	call with clients to update on status	1
10/22/2020	emails with cocounsel re settlement	0.4
10/22/2020	discussions with dasher class members	1
10/30/2020	emails with cocounsel and other plaintiff counsel re settlement	2
10/30/2020	review draft settlement agreement	3.5
10/30/2020	call with Todd Friedman	0.5
10/30/2020	call clients with update; discuss settlement agreement to gather signatures	2
11/2/2020	discussions with other plaintiff firms re settlement and new release	0.5
11/3/2020	emails with arbitrators re cases in abeyance	0.4

11/3/2020	emails with cocounsel and plaintiff counsel re release and settlement issues	0.5
11/3/2020	organize submissions of materials for filing of approval papers; case file review	0.6
11/4/2020	review supplemental brief in support of approval	1.2
11/11/2020	further discussions with clients re case status	0.4
11/12/2020	discussions with dasher class members	1
11/16/2020	emails with Joel Young and Steve Tidrick	0.3
11/16/2020	call with Todd Friedman	0.5
11/17/2020	emails with Joel Young and Steve Tidrick	0.3
11/17/2020	call with Todd Friedman	0.5
11/17/2020	review objection of Antic; emails with cocounsel re same	2.6
11/17/2020	review case file	0.6
11/19/2020	emails with cocounsel re objection and motion to strike	0.6
11/20/2020	review motion to strike	0.4
11/20/2020	emails with cocounsel re approval status and strategy	1.2
11/20/2020	emails with defense re joint status report and continuance of hearing in Marko action; review joint draft and approve filing	1
11/23/2020	emails with cocounsel re objections and settlement issues	0.5
11/24/2020	emails with cocounsel re objections and settlement issues	0.5
11/24/2020	emails with defense re continued hearing	0.2
12/1/2020	review minute order, update firm calendar	0.5
12/2/2020	call with clients to update on status	1
12/3/2020	emails with cocounsel re case status	0.3
12/23/2020	extensive emails re case status with cocounsel	1.2
12/23/2020	review docket and check with office manager to see if firm served with copy of moving papers	1.2
12/29/2020	review intervention motion; notes re same for opposition brief	3.3
12/29/2020	emails with cocounsel re case strategy and status issues	0.4
12/30/2020	strategy call with co-counsel; emails re same	0.5
12/30/2020	call with todd friedman	0.5
12/31/2020	emails with cocounsel re strategy	0.5
1/4/2021	emails with cocounsel re settlement issues	0.2
1/5/2021	emails with cocounsel re settlement issues	0.8
1/5/2021	call with Todd re settlement issues	0.3
1/5/2021	review amendment to settlement agreement; emails re same	1.5
1/6/2021	extensive emails re settlement approval with cocounsel; review final draft of papers	1.5
1/7/2021	extensive emails re settlement approval with cocounsel	1.2
1/8/2021	call with clients to update on status	1.2
1/20/2021	emails with cocounsel re preliminary approval	0.5

2/3/2021	review response to objection of Allen Graves; discuss with Todd Friedman	2.5
2/4/2021	review prop 22 development; discuss whether it impacts class members with Todd	3.5
2/10/2021	review case filed by Graves; pull docket; discuss with Todd Friedman	3
2/10/2021	emails with cocounsel re objection	0.4
2/11/2021	receipt of courtcall confirmation; preparation for appearance	1.8
2/11/2021	call with Todd Friedman	0.5
2/12/2021	call and emails with cocounsel re case status and settlement and approval issues	0.5
2/16/2021	call with clients to update on status	1
2/16/2021	coordinate joint status report with defense counsel; emails re same	0.5
2/17/2021	emails with court clerk and cocounsel re preliminary approval	0.7
2/17/2021	update firm calendar	0.5
2/17/2021	call with Todd Friedman re case status	0.5
2/22/2021	review court order; update firm calendar	0.4
2/26/2021	call with Todd Friedman re case status	0.5
3/2/2021	comprehensive file review; damages overview and compare prior kullar analysis to updated figures; procedural history review and evidence on merits and certification issues	6.8
3/3/2021	prepare for mediation with Tripper Ortman	5.5
3/3/2021	emails with cocounsel re moving mediation date	0.2
3/4/2021	emails with cocounsel and court re preliminary approval	0.5
3/6/2021	call with clients to update on status	1.5
3/6/2021	discussion of case with Tom and Todd	0.5
3/15/2021	call with todd friedman	0.5
3/15/2021	emails with cocounsel re mediation	0.3
3/16/2021	emails with cocounsel re mediation	0.3
3/16/2021	call with todd to prep for mediation	1
3/17/2021	pre-mediation discussion and emails re strategy	1
3/17/2021	call with cocounsel re mediation	0.5
3/17/2021	comprehensive review of doordash mediation statement and accompanying materials for mediation with Tripper Ortman; review damages analysis	2
3/18/2021	calls with Todd Friedman re mediation and settlement issues	1
3/18/2021	emails with cocounsel re case strategy	0.2
3/18/2021	legal research on risks in misclassification case regarding certification and damages issues	2
3/19/2021	call with todd friedman re strategy and case management	1
3/19/2021	emails with cocounsel re preliminary approval issues	0.3
3/25/2021	emails with cocounsel re preliminary approval issues	1.2
3/26/2021	call with Todd Friedman	0.8

3/26/2021	extensive emails with cocounsel re preliminary approval issues	2
3/29/2021	redline settlement docs; review complex CMO checklist to ensure compliance with all major terms	6.5
3/29/2021	emails re preliminary approval	0.5
3/29/2021	call with todd friedman re preliminary approval	0.4
3/29/2021	call with cocounsel re preliminary approval	0.5
3/30/2021	call with Todd Friedman to coordinate future deadlines and projects for preliminary approval	0.5
3/30/2021	review comments to redline of second amended complaint; emails re same	3
4/1/2021	review doordash edits to settlement documents; emails re same	2.5
4/2/2021	emails with defense and cocounsel re settlement	0.5
4/3/2021	emails re settlement agreement	0.2
4/5/2021	update clients on case status	0.6
4/5/2021	extensive email exchanges and texts and calls regarding settlement issues with defense, cocounsel and plaintiff attorneys; facilitate signatures	5.8
4/5/2021	review and approve final version of settlement agreement	4
4/6/2021	call with todd friedman	0.6
4/6/2021	dozens of extensive strategy emails re preliminary approval issues with cocounsel and with firm re CMO, and approval requirements; coordination of signatures from defense and plaintiff counsel	6
4/6/2021	call with clients; facilitate signature on fee sharing agreement for compliance with CMO; gather client signatures	1.5
4/6/2021	review and approve fee sharing agreement; discuss with todd friedman	1
4/7/2021	Review submissions from counsel to ensure compliance with CMP	1.5
4/7/2021	dozens of emails, texts and calls coordinating signature pages from other plaintiffs; emails with cocounsel re preliminary approval issues; and strategy discussions	5
4/8/2021	call with Todd re case status	1
4/8/2021	Emails with cocounsel re preliminary approval	0.9
4/9/2021	emails with cocounsel and plaintiff counsel re approval documents and additional signatures; review documents to ensure compliance with procedure	1.5
4/9/2021	call with clients to update on status	1
4/13/2021	preliminary review of draft approval papers; revisions to firm declaration in support of motion	4.5
4/13/2021	extensive emails re preliminary approval	1.4
4/14/2021	call with todd	0.5
4/14/2021	review SLR declaration and kullar analysis; compare to own analysis conducted; ensure parity	3.5
4/14/2021	extensive emails re preliminary approval	2
4/15/2021	call with todd	0.5
4/15/2021	review and finalize stipulation to exceed page limit; prepare for filing	0.8

4/15/2021	review complex court CMO; ensure compliance with details for approval brief	1
4/15/2021	revisions to Todd Friedman Declaration	4
4/15/2021	extensive review of draft of approval filings, exhibits; emails re same with cocounsel	6
4/16/2021	joint call with defense to clerk of court re advancement of hearing date	0.2
4/16/2021	emails re preliminary approval filing and settlement issues	1.5
4/16/2021	final review of preliminary approval papers; discuss with Todd Friedman; finalize papers for filing; file and serve all papers with counsel	5.5
4/22/2021	review notice of rejection; resubmit filing	1.2
4/27/2021	review order granting stipulation to exceed page limits	0.3
4/27/2021	emails with defense and cocounsel re preliminary approval issues	0.8
4/29/2021	review case anywhere posting from court; emails with cocounsel re same; update firm calendar	0.5
5/14/2021	call with Todd re potential shakedown efforts of Preto and strategy issues	0.5
5/14/2021	review notes from prior conversation with Rick Preto wherein he levied veiled threats and attempted to extort large fee for his firm in exchange for withdrawing objection, without providing basis	0.5
5/14/2021	emails with Rick Preto re potential objection	0.2
5/14/2021	email with co-counsel re potential objector Rick Preto	0.3
5/24/2021	emails re upcoming deadlines	0.3
5/24/2021	review of tentative ruling; read and discuss with co-counsel	2.5
5/25/2021	extensive strategy discussion re upcoming deadline; review of prior orders and local rules	3
5/26/2021	draft materials for approval filings	2.5
5/26/2021	draft template client declaration for preliminary approval	1.5
5/27/2021	emails re status of upcoming deadlines	0.3
6/1/2021	emails re status of upcoming deadlines	1
6/2/2021	call with Todd re status of case	0.5
6/3/2021	emails re status of upcoming deadlines	0.2
6/3/2021	emails re status of upcoming deadlines	0.4
6/6/2021	emails re supplemental motion; review of materials	1
6/9/2021	emails with counsel re status of upcoming deadline	0.2
6/9/2021	call with clients to update on status	1
6/14/2021	emails re supplemental motion	0.3
6/15/2021	extensive review of supplemental briefing, settlement agreement, exhibits; email re same	3.5
6/16/2021	call with Todd re status	0.5
6/16/2021	draft redline amended complaint for approval motion; emails re same and approval motion status	4
6/16/2021	draft declarations of clients in support of preliminary approval; calls with clients re same; coordinate gathering signatures	3.2

6/16/2021	emails with cocounsel and other plaintiff lawyers re motion for approval	0.7
6/17/2021	extensive emails coordinating documents from co-counsel and other plaintiffs	2
6/17/2021	coordinate and finalize all declarations of counsel and motion for approval; draft proof of service; file and serve all documents; extensive reformatting issues and troubleshooting regarding PDF documents so they would upload to system	11.5
6/18/2021	monitor status of filing of motion and supporting declarations; emails re same	2.5
6/22/2021	discuss claims with class member; review case file to answer questions	1.5
6/25/2021	review tentative ruling; emails re same	2
6/28/2021	emails with cocounsel re tentative ruling and supplemental brief	1
7/2/2021	review draft supplemental brief; comments re same and emails with counsel	1.7
7/3/2021	revisions to supplemental brief and attachments; emails re same	1
7/5/2021	revisions to supplemental brief and attachments; emails re same	2.5
7/6/2021	emails with administrator	0.4
7/6/2021	review revisions to notice documents	0.8
7/6/2021	review draft of supplemental filing; prepare document for filing with the court and file brief and serve on case anywhere and via email to all counsel; draft proof of service	4
7/6/2021	extensive emails with counsel re supplemental filing and upcoming hearing	3
7/8/2021	review court posting on case anywhere; emails re same	0.2
7/8/2021	emails with counsel re settlement issues	0.7
7/8/2021	review final agreement; provide to Nadia to coordinate signatures with clients	0.5
7/8/2021	receipt of courtcall confirmation; preparation for appearance	2.8
7/9/2021	review court posting on case anywhere; emails re same	0.2
7/9/2021	review/approve proposed order	0.3
7/9/2021	extensive emails re finalization of supplemental filing and administration issues	0.8
7/10/2021	extensive emails re finalization of supplemental filing and administration issues	1.3
7/11/2021	extensive emails re finalization of supplemental filing and administration issues	4
7/11/2021	finalize supplemental declaration, attachments and draft proof of service and prepare for filing and service of supplemental brief	5.5
7/11/2021	call with Todd Friedman	0.4
7/11/2021	prepare for approval hearing; call with todd friedman	6
7/12/2021	prepare for and attend preliminary approval hearing	4.2
7/12/2021	update firm calendar	1

7/12/2021	call with Todd Friedman	0.5
7/12/2021	review order granting preliminary approval	1
7/13/2021	receipt of and review notice of ruling	0.5
7/13/2021	file and serve additional signature pages; declaration of todd friedman	1.2
7/13/2021	emails with administrator re settlement and website	0.5
7/13/2021	extensive emails re settlement and administration issues	3.3
7/14/2021	emails with counsel and administrator	0.3
7/16/2021	receipt of conformed copy of filing	0.2
7/21/2021	emails with admin	0.1
7/22/2021	emails with admin	0.1
7/22/2021	emails and call with todd and michael hassen	1
7/22/2021	discussion of future projects with Michael Hassen as well as fee declaration and timing of motion for final approval; extensive emails re same	3
7/23/2021	emails with Michael Hassen re fee application	0.3
8/2/2021	legal research on mega settlements and common fund analysis for fees	5.5
8/3/2021	call with Todd Friedman re potential bad faith objectors and strategy	1
8/10/2021	emails with counsel re administration	0.2
8/11/2021	emails with counsel re administration	0.4
8/12/2021	emails with counsel re administration	0.2
8/13/2021	emails with counsel and administrator	0.6
8/16/2021	call with Todd re case status	0.5
8/16/2021	emails re administration issues	0.4
8/16/2021	call with administrator re upcoming project and q&a	0.6
8/19/2021	brainstorm possible administration and notice solutions; review file and discuss with cocounsel	0.3
8/19/2021	review claim form, email notice and notice packets	0.5
8/19/2021	review Email notice	0.2
8/19/2021	emails with administrator and counsel re settlement and admin issues	1.5
8/20/2021	review claim form	0.2
8/20/2021	emails with administrator and counsel re settlement and admin issues	1
8/23/2021	emails regarding administration and timing issues	0.8
8/25/2021	review class settlement website	1
8/25/2021	extensive email traffic re administration issues	1.5
8/26/2021	email traffic re administration issues with defense, administrator and cocounsel	1.2
8/26/2021	review FAQ on administration website	1.5
8/27/2021	calls with clients case status update	1
8/27/2021	calls with class members	1
8/27/2021	discuss administration issues and progress with Todd	1
8/27/2021	emails with Todd and class members	0.5

8/30/2021	emails with cocounsel and administrator re settlement and administration issues	0.7
8/30/2021	update clients on settlement of case and next steps; draft letter to clients	2
8/30/2021	receipt of inquiry from press; emails re same	0.2
8/31/2021	emails re administration	0.5
8/31/2021	call with todd friedman re administration status	0.5
9/1/2021	review Gizmodo article; discuss with todd friedman	0.6
9/1/2021	coordinate declarations from other plaintiff firms for final approval	0.5
9/1/2021	emails with clients	0.3
9/1/2021	emails with defense counsel and administrator	0.5
9/1/2021	emails with cocounsel	0.4
9/2/2021	emails with defense counsel and administrator	0.5
9/2/2021	call with Todd Friedman re case status	0.3
9/2/2021	discuss case status with clients	0.5
9/2/2021	discussion with class members	0.5
9/2/2021	emails with cocounsel regarding administration proposal	0.5
9/3/2021	discussion with class members	0.5
9/3/2021	emails with cocounsel and administrator	0.8
9/7/2021	review opt out/objection, emails re same	0.3
9/7/2021	review subsequent reminder notice proposal from administrator, emails re same	0.3
9/7/2021	emails with administration	0.4
9/7/2021	emails with counsel re administration	0.3
9/7/2021	calls with clients case status update	0.8
9/8/2021	discuss case status and declarations with Michael Hassen	0.2
9/8/2021	update clients on status of claims; case file review	0.7
9/8/2021	emails with administrator	0.2
9/8/2021	emails with counsel re case status	0.2
9/8/2021	calls with clients case status update	1.2
9/8/2021	calls and emails with dashers regarding doordash settlement and questions	0.6
9/8/2021	discuss opt outs questions with outside plaintiff firm representing dashers	2
9/9/2021	emails with counsel re administration	0.2
9/10/2021	emails with administrator re further administration notice measures	0.3
9/11/2021	discuss findings on legal research with Tom Wheeler	0.7
9/11/2021	legal research on final approval and fees in mega settlements; hours report; final approval and fee declaration	7.7
9/11/2021	emails with michael hassen	0.2
9/12/2021	legal research on final approval and fees in mega settlements; hours report; final approval and fee declaration	9.5
9/12/2021	call with todd friedman re case status	0.5
9/13/2021	emails with todd and erika re approval issues	0.3

9/13/2021	legal research on final approval and fees in mega settlements; hours report; final approval and fee declaration	6.2
9/14/2021	emails with cocounsel re approval briefing	0.3
9/14/2021	emails with defense re administration	0.1
9/14/2021	legal research on final approval and fees in mega settlements; hours report; final approval and fee declaration	5.5
9/14/2021	discuss with case with Tom Wheeler	1.5
9/15/2021	calls with todd friedman re case status	0.3
9/15/2021	review capstone declarations	0.3
9/15/2021	emails with defense and cocounsel re administration	0.4
9/15/2021	emails with administrator	0.2
9/15/2021	Hours reports	4
9/16/2021	calls with todd friedman re case status	0.5
9/16/2021	review weekly administration report	0.2
9/16/2021	emails with cocounsel re administration and case status	0.5
9/16/2021	review mass opt outs submissions	0.4
9/16/2021	emails with administrator	0.5
9/17/2021	draft final approval and review/prepare hours report	6.5
9/17/2021	emails with administrator	0.3
9/17/2021	review case file and notes from prior case history	0.8
9/17/2021	emails with cocounsel re potential objectors	0.5
9/17/2021	calls with Todd Friedman	0.8
9/17/2021	review documents from potential objectors	1.2
9/19/2021	review documents in case history relating to potential objectors	1.5
9/19/2021	memo to file regarding possible objectors	1
9/19/2021	emails with co-counsel re status	0.2
9/19/2021	calls with Todd Friedman re case status	0.5
9/19/2021	call with michael hassen re case progress and future projects	0.7
9/20/2021	review opt out and objection report and emails with administrator re same	0.5
9/20/2021	comprehensive case file overview to review case history	1.5
9/20/2021	calls with Todd Friedman re case status	0.5
9/20/2021	review Campbell counsel declaration, communications re same	0.5
9/20/2021	Hours reports	4
9/20/2021	prepare for and attend zoom conference with cocounsel	1
9/20/2021	legal research on prevailing rates and common fund percentage of the fund and mega settlements	2.5
9/21/2021	discuss case with Michael Hassen	0.2
9/21/2021	phone calls with Todd Friedman re case status and progress and approval issues	0.5
9/21/2021	phone call with defense counsel re administration and approval issues	0.5
9/21/2021	review opt out and objection report and emails with administrator re same	0.5

9/21/2021	discussions with Todd Friedman and co-counsel	0.4
9/21/2021	review case file and status of project	0.4
9/21/2021	review/revise declaration in support of attorneys' fees and costs; emails re same	2
9/21/2021	further investigation of opt out program and website; gather copies of retainer agreement and opt out evidence for declarations	1
9/21/2021	legal research on prevailing rates and common fund percentage of the fund and mega settlements	1.5
9/21/2021	emails with co-counsel re administration and approval issues	1.3
9/21/2021	review opt out and objection issues; emails with administrator re same	0.6
9/22/2021	calls with Todd Friedman re case status	0.5
9/22/2021	discuss case with Todd Friedman and co-counsel; emails re same	0.5
9/22/2021	coordinate declarations with co-counsel	0.3
9/22/2021	assemble hours reports	8
9/22/2021	emails with co-counsel re fee declarations and client declarations and other administration issues	0.8
9/23/2021	review client declarations for attorneys fees and costs and incentive award brief	0.5
9/23/2021	emails with staff re administration	0.2
9/23/2021	assemble and review hours reports - go through thousands of time entries, ensure accuracy, clean up descriptions to ensure work product limited	10.5
9/23/2021	emails with cocounsel re administration and approval issues	1
9/23/2021	review court record and prior filings; discussion with Todd	1
9/23/2021	review weekly administration report	0.2
9/23/2021	calls with todd friedman re administration	0.8
9/23/2021	review and approve revised retainer agreement	0.1
9/24/2021	dozens of calls and emails with cocounsel re administration and approval issues	4.2
9/24/2021	discussions with Michael Hassen	0.3
9/24/2021	Work on approval briefs and review hours reports	6.5
9/25/2021	discuss case with Todd Friedman	0.5
9/25/2021	Work on approval briefs and review hours reports	10
9/25/2021	emails with defense and administrator	0.1
9/26/2021	call with Todd Friedman	1
9/26/2021	Work on approval briefs and review hours reports	12
9/26/2021	emails with cocounsel coordinating fee application	0.5
9/27/2021	assist with finalizing fee application and accompanying documents; file and serve	7.5
Various	future anticipated hours	250

TOTAL TIME – 2,413.8
LODESTAR - \$1,810,350.00

Meghan E. George, Esq. – Senior Associate
Rate: \$650/hr

Date	Task	Hours
10/5/2016	investigation into potential misclassification issues under gig economy standards against Doordash	3.5
10/5/2016	email to firm regarding findings, initiate new potential investigation of case	0.3
3/28/2018	emails with firm regarding legal doctrines relating to case and possible legal research avenues	0.5
4/13/2018	firm roundtable re new DOL opinions; emails re same	0.8
8/8/2018	emails with firm re court of appeal voicemail and filing issues	0.3
8/30/2018	firm roundtable discussion re new potential claims	0.8
12/17/2018	discuss legal question with Adrian and Todd	0.5
4/26/2019	roundtable with firm members on McGill v Citibank issues relating to Doordash case and potential public injunctive relief claims	2

TOTAL TIME – 8.7
LODESTAR - \$5,655.00

Thomas E. Wheeler, Esq. – Associate
Rate: \$475/hr

Date	Task	Hours
3/28/2018	emails with firm regarding legal doctrines relating to case and possible legal research avenues	0.5
4/13/2018	firm roundtable re new DOL opinions; emails re same	0.8
4/26/2019	roundtable with firm members on McGill v Citibank issues relating to Doordash case and potential public injunctive relief claims	2
5/2/2018	read Dynamex decision	2
5/3/2018	Strategy discussions with Adrian, Yoel Todd and Mordechai regarding impact of decision on Doordash case and how this changes the strategy of the rest of litigation on the case	4
6/25/2018	review Fast Pay feature; discussion roundtable with Adrian and Todd re same	3
7/18/2018	extensive discussion with Adrian and Todd re deactivation policy and impact on merits of the claims; roundtable issues; review findings of Adrian and documents and notes	4
8/7/2018	emails with Todd	0.2
9/15/2018	roundtable findings of revisions to dasher model with firm; discuss impact on case	0.8
8/17/2019	discuss case with Adrian Bacon assignment of projects for upcoming mediation	1
8/18/2019	calls with clients and dashers - notes to Adrian Bacon	3
8/19/2019	call with Adrian Bacon re upcoming mediation and case theories; review mediation materials, assist with mediation preparation	2
8/21/2019	call with Adrian Bacon re upcoming mediation and case theories; review mediation materials, assist with mediation preparation	2
8/22/2019	Participate remotely in mediation; calls with Adrian Bacon throughout mediation to assist with negotiations	1.2
9/25/2018	review motion to dismiss appeal filed by Marciano	1.5
9/25/2018	extensive emails with firm re appellate status and motion; litigation strategy	1
9/25/2018	legal research project assigned from Adrian; research intervention and objection standards for appeal in California state court; extensive file review	6
9/26/2018	legal research project assigned from Adrian; research intervention and objection standards for appeal in California state court; extensive file review	4
9/27/2018	share findings of research with Adrian and Todd	2
9/27/2018	begin draft of motion to intervene and vacate judgment	5

10/1/2018	emails with firm re intervention and appeal issues	1
10/1/2018	draft of motion to intervene and vacate judgment	5.5
10/11/2018	draft of motion to intervene and vacate judgment	5
10/11/2018	emails with firm re project status	0.3
10/26/2018	emails with firm re status of motions and other projects	0.4
10/26/2018	draft of motion to intervene and vacate judgment	4.5
10/29/2018	draft of motion to intervene and vacate judgment	5
10/30/2018	draft of motion to intervene and vacate judgment	3
11/3/2018	draft complaint in intervention	6.5
11/4/2018	draft proposed order and notice of payment of court reporter fee	1.2
11/11/2018	additional legal research	4
11/12/2018	draft of motion to intervene and vacate judgment; gather exhibits; case file review extensive overview of history of actions	7
11/30/2018	discuss final brief with Adrian Bacon	2
12/18/2018	emails re Marciano appeal	1.5
12/19/2018	legal research on procedural question	3.5
12/18/2018	emails re Marciano appeal	1.5
12/31/2018	emails re intervention with firm	0.5
5/12/2019	read Magana arbitration ruling; discuss with Adrian and Todd	2.5
7/31/2019	discuss case status with Todd and Adrian	1
3/6/2021	discussion of case with Todd and Adrian	0.5
9/10/2021	legal research on mega settlements and common fund analysis for fees	4.8
9/11/2021	discuss findings on legal research with Adrian Bacon	0.7
9/14/2021	further legal research; discuss with adrian bacon	1.5
9/20/2021	discuss potential objector issue with Adrian Bacon, offer insight and discuss possible responses	1

TOTAL TIME – 92.1
LODESTAR - \$43,747.50

Yoel Hanohov, Esq. – Associate
Rate: \$425/hr

Date	Task	Hours
3/29/2017	discuss case with Daniel Marko	1.2
3/29/2017	emails with firm re class rep	0.5
3/29/2017	call with Adrian re case status and new class rep	1
3/30/2017	calls with new class representatives	1.5
4/1/2017	calls with new class representatives	0.6
4/1/2017	emails with adrian bacon re new case	0.5
4/3/2017	factual and legal investigation	7.2
4/4/2017	legal research; provide results to adrian bacon	5.5
4/5/2017	factual and legal investigation	6
4/5/2017	call with client	0.5
4/8/2017	research into Doordash and claims; investigate online complaints and company business model	8
4/9/2017	research into Doordash and claims; investigate online complaints and company business model	6.5
4/10/2017	provide information to Adrian Bacon re findings	2.5
4/17/2017	follow up with client for signed retainer	0.5
4/17/2017	emails with firm re case status	0.5
4/18/2017	call with client	0.5
4/21/2017	emails with client	0.3
4/21/2017	case file review	1
4/22/2017	emails with client	0.1
4/23/2017	emails with client	0.1
4/28/2017	Discuss case with Adrian Bacon	0.4
4/28/2017	begin draft complaint	8
4/29/2017	draft complaint, further revisions	6.8
4/30/2017	draft complaint, summons, civil cover sheet, and complex sheet	6.6
5/1/2017	discuss revisions with Adrian Bacon; prepare final version or filing and file	5.5
5/1/2017	arrange for service of complaint post-filing	0.5
5/1/2017	drat PAGA notice letter; discuss case with Adrian Bacon	2
5/1/2017	submit PAGA notice to LWDA and Doordash; save docs to file	0.8
5/17/2017	review case file; discuss with Adrian and Todd	1
6/7/2017	discuss Marciano I with Adrian; pull case documents from docket save to file	2.5
6/8/2017	review Marciano I case information in detail, discuss with Adrian Bacon	6.5
6/9/2017	review Marciano I case information in detail, discuss with Adrian Bacon	7
6/12/2017	discuss case with new client Brock Baker	1.5

8/24/2017	extensive review of Marciano settlement agreement; discuss assignment of new research project with Adrian Bacon	5
8/25/2017	pull Marciano I and Kissner case files; discussion with Adrian Bacon	3
8/25/2017	extensive legal research into objection standards, misclassification, kullar analysis, procedural issues, fairness standards, damages issues, and merits of underlying claims	4
8/25/2017	call with Adrian Bacon	0.5
8/25/2017	review entirety of Marciano I and Kissner actions dockets; notes for outline	3.5
8/26/2017	further legal research	6
8/27/2017	further legal research	7
8/28/2017	review McGill v Citibank, and research public injunctive relief issues	1.5
8/29/2017	review Marciano I; review outline of Adrian Bacon; begin draft of brief	5.5
8/30/2017	Legal research; initial draft of objection in Marciano I	11.5
8/30/2017	discuss with Adrian Bacon	0.5
8/31/2017	Further drafting of brief and discussions with Adrian	4.3
8/31/2017	discuss upcoming client declaration with clients	0.6
9/1/2017	Legal research; initial draft of objection in Marciano I	9.5
9/2/2017	review additional legal research; further discussions with Adrian Bacon re further modifications to draft	5
9/3/2017	further revisions to draft of brief	2.2
9/4/2017	further revisions to draft of brief and declarations and supporting evidence	4
9/4/2017	discuss status with Adrian Bacon	0.3
9/5/2017	final review of draft brief, assist in assembling final product for filing	2
9/5/2017	assist with finalizing brief; discussions with Adrian Bacon; file and serve brief on LWDA and claims administrator; review correct procedure for objecting per the settlement notice and advise partners	6
9/11/2017	draft/file notice of appearance	0.4
9/12/2017	review reply brief of Marciano re objection; discussion with Adrian and Todd Friedman	3
9/13/2017	assist Adrian in preparation for hearing; attend hearing as observer; debrief events thereafter with Todd and Adrian	4
9/16/2017	discussion with Todd and Adrian re case strategy	0.2
9/27/2017	review motion to compel materials, begin outline of issues	5
9/29/2017	research on motion to compel for Adrian; discuss findings with Adrian	3.5
10/1/2017	review draft of brief; redline revisions, assist with finalizing brief	3.5
10/1/2017	emails with Adrian re PAGA notice and motion to compel	0.5
10/2/2017	finalize supplemental PAGA notices; prepare for filing	1.5
2/7/2019	emails with firm re scheduling and assignment of projects	0.3
2/8/2019	emails with firm re scheduling and assignment of projects	0.3
2/13/2018	emails with counsel re briefing schedule	0.1
2/14/2018	review supplemental papers; discuss with Adrian and Todd	2

2/15/2018	receipt of assignment of projects from Adrian Bacon; begin work on Doordash analysis and research	7
2/15/2018	assignment of project from Adrian Bacon, phone call	1
2/16/2018	Case file review; further research on objection standards	6
3/3/2018	discussion with Adrian Bacon; draft notice of errata	1.5
3/4/2018	final review of notice of errata; file and serve	1
3/16/2018	call with Adrian re case status and new projects	1
3/16/2018	emails re case strategy and status	0.5
3/17/2018	receipt of supplemental brief from Marciano and declarations; discuss with Adrian	1.5
3/17/2018	receipt of supplemental brief from Doordash; discuss with adrian	1.5
3/17/2018	firm discussion with Todd and Adrian re next steps and case strategy	2
3/18/2018	strategy discussions with Todd and Adrian	2
3/19/2018	calls and emails with Adrian and Todd	1.2
3/27/2018	discuss case with Adrian; review case file, assist with research projects for Adrian	2.5
3/28/2018	assist with draft of supplemental papers	3
3/28/2018	discuss assignments with Adrian	1
3/28/2018	emails with firm regarding legal doctrines relating to case and possible legal research avenues	0.5
3/28/2018	emails with firm regarding legal doctrines relating to case and possible legal research avenues	0.5
3/29/2018	calls with clients regarding dasher experiences; notes to the file	2.5
3/29/2018	call with Todd Friedman and Adrian	0.7
3/30/2018	further revisions to draft brief; discussions with Todd and Adrian; file brief and serve	5.5
3/31/2018	emails with Adrian re errata; draft and file and serve errata	1.5
4/2/2018	discuss case status with Adrian	0.2
4/9/2018	receipt of reply brief; review and notes to file	1
4/10/2018	extensive email and phone discussions with Todd and Adrian	2.5
4/12/2018	emails with defense re filings	0.2
4/13/2018	firm roundtable re new DOL opinions; emails re same	0.8
4/13/2018	legal research on travel time compensation	7.5
4/14/2018	legal research on compensable travel time; discuss findings with Adrian	6.5
4/18/2018	emails with Adrian re supplemental authority notice	0.3
4/18/2018	Extensive preparation for Marciano I hearing on final approval; calls with Adrian and Todd re same	7
4/18/2018	draft and file notice of supplemental authority	1
4/19/2018	attend Marciano I hearing on final approval; calls with Todd and Adrian after hearing; strategy meeting	2.5
4/20/2018	research on appellate procedure and rules of court; report findings to partners	4.5

4/20/2018	emails with todd and adrian re case strategy	0.8
5/1/2018	read Dynamex decision	2
5/3/2018	Strategy discussions with Adrian, Todd Mordechai and Tom regarding impact of decision on Doordash case and how this changes the strategy of the rest of litigation on the case	4
5/7/2018	monitor docket of Marciano I	0.7
5/7/2018	emails with Adrian and Todd	0.2
5/7/2018	draft notice of appeal	1
5/9/2018	emails re appeal and transcript of proceedings;	0.2
5/10/2018	emails re proposed judgment and strategy	0.3
5/11/2018	daily review of docket	0.2
5/14/2018	daily review of docket	0.2
5/14/2018	call clerk for status update	0.2
5/15/2018	daily review of docket	0.2
5/16/2018	daily review of docket	0.2
5/17/2018	daily review of docket	0.2
5/18/2018	emails with firm re appeal and case status	0.3
5/18/2018	daily review of docket	0.2
5/21/2018	daily review of docket	0.2
5/21/2018	call clerk for status update	0.2
5/22/2018	daily review of docket	0.2
5/23/2018	daily review of docket	0.2
5/24/2018	daily review of docket	0.2
5/25/2018	daily review of docket	0.2
5/27/2018	daily review of docket	0.2
5/28/2018	daily review of docket	0.2
5/28/2018	call clerk for status update	0.2
5/29/2018	daily review of docket	0.2
5/30/2018	emails with firm re appeal and case status	0.3
5/30/2018	daily review of docket	0.2
5/31/2018	daily review of docket	0.2
6/3/2018	daily review of docket	0.2
6/4/2018	daily review of docket	0.2
6/4/2018	call clerk for status update	0.2
6/5/2018	daily review of docket	0.2
6/6/2018	daily review of docket	0.2
6/7/2018	daily review of docket	0.2
6/10/2018	daily review of docket	0.2
6/11/2018	daily review of docket	0.2
6/11/2018	call clerk for status update	0.2
6/12/2018	daily review of docket	0.2

6/13/2018	daily review of docket	0.2
6/14/2018	daily review of docket	0.2
6/17/2018	daily review of docket	0.2
6/18/2018	daily review of docket	0.2
6/19/2018	daily review of docket	0.2
6/19/2018	call clerk for status update	0.2
6/20/2018	daily review of docket	0.2
6/21/2018	daily review of docket	0.2
6/24/2018	daily review of docket	0.2
6/24/2018	call clerk for status update	0.2
6/25/2018	daily review of docket	0.2
6/26/2018	daily review of docket	0.2
6/27/2018	daily review of docket	0.2
6/28/2018	daily review of docket	0.2
7/1/2018	daily review of docket	0.2
7/2/2018	daily review of docket	0.2
7/2/2018	emails with firm re appeal and case status	0.3
7/2/2018	call clerk for status update	0.2
7/3/2018	daily review of docket	0.2
7/4/2018	daily review of docket	0.2
7/5/2018	daily review of docket	0.2
7/8/2018	daily review of docket	0.2
7/8/2018	call clerk for status update	0.2
7/9/2018	daily review of docket	0.2
7/10/2018	emails with firm re case status; review filings by Doordash	0.6
7/10/2018	daily review of docket	0.2
7/11/2018	daily review of docket	0.2
7/12/2018	daily review of docket	0.2
7/12/2018	pull signed order; report to partners; calendar deadline	0.5
7/25/2018	emails with firm re case status; review filings by Doordash	0.6
7/25/2018	file notice of appeal; notice designating record on appeal	1.5
7/25/2018	draft notice designating record on appeal	1
8/6/2018	review designation of record on appeal; discuss with Erika and Adrian	0.8
8/9/2018	emails with todd and adrian re appeal and case status	0.5
8/9/2018	emails re appeal and designation of record; review case file and appellate and objection record	1.3
8/13/2018	emails with attorneys at firm re appellate status	0.4

TOTAL TIME – 306
LODESTAR - \$130,050.00

Mordechai Wolowitsch, Esq. – Associate/Law Clerk
Rate: \$250/425/hr

Date	Task	Hours
4/13/2018	legal research on new DOL opinions; memo to firm re findings	5.5
5/1/2018	read Dynamex decision	2
5/3/2018	Strategy discussions with Adrian, Yoel Todd and Tom regarding impact of decision on Doordash case and how this changes the strategy of the rest of litigation on the case	4
8/1/2018	review notice of related cases; discuss assignment of tasks from Adrian	0.3
8/1/2018	pull related case docket; overview of case history and documents; relay findings to Adrian	6
8/7/2018	legal research on appeals for Todd and Adrian; discussions with Todd Adrian and Kelsey	3.5
8/13/2018	discuss new case assignment with adrian	1
8/13/2018	emails with attorneys at firm re appellate status	0.4
8/13/2018	call court of appeal; case file review; update Adrian on status	3.5
8/14/2018	draft amended motion to designate	1.2
8/15/2018	firm discussion regarding new potential claims for case on behalf of dashers	2
8/19/2018	Review new case file; discussion with adrian bacon	1
8/21/2018	calls with clerk of appeal court; emails and calls with adrian and Erika re same	1
8/25/2018	research on amended notice of designation of record	3
8/29/2018	draft amended notice of designation of record and attachments for Adrian review and approval; emails re same	3
8/30/2018	firm roundtable discussion re new potential claims	0.8
8/31/2018	file amended designation of record; emails re same	1.8
9/10/2018	emails re appeal and future deadlines	0.3
9/11/2018	emails re appeal and future deadlines	0.3
9/11/2018	update firm calendar	0.4
9/15/2018	roundtable findings of revisions to dasher model with firm; discuss impact on case	0.8
9/18/2018	draft civil case info sheet for Todd and Adrian Review; emails re same; finalize and file	1.5
9/25/2018	review motion to dismiss appeal filed by Marciano	1.5

9/25/2018	extensive emails with firm re appellate status and motion; litigation strategy	1
9/28/2018	emails with firm re case status	0.3
10/1/2018	emails with firm re intervention and appeal issues	1
10/2/2018	emails and discussions with Adrian	1
10/11/2018	emails with firm re project status	0.3
10/26/2018	emails with firm re status of motions and other projects	0.4
11/9/2018	email with clients; case file review and work on initial pleadings	3
11/20/2018	case file review' work on initial pleadings	3
11/20/2018	emails with adrian re future projects	1
12/18/2018	emails re Marciano appeal	1.5
12/18/2018	emails re Marciano appeal	1.5
12/31/2018	emails re intervention with firm	0.5
1/2/2019	draft and file withdrawal of intervention papers	1
4/17/2019	emails re deadlines and future projects with firm	0.3
4/18/2019	call with Adrian re mediation projects	1
DEMARCATIION		
12/3/2018	review final draft of intervention and motion to vacate; discuss with Adrian and Tom; draft proof of service and file and serve documents	4
1/9/2019	discuss case status with Adrian Bacon; update deadlines and calendar	0.3
2/14/2019	discussion of McGill issues in case with firm	0.3
2/25/2019	discuss case status with Adrian Bacon; update deadlines and calendar	0.3
3/7/2019	discuss case status with firm	0.2
3/10/2019	discuss case status with firm	0.2
3/11/2019	discuss case status with firm	0.2
3/12/2019	discuss case status with firm	0.2
3/18/2019	review marko and corona doordash arbitration files and calendars, emails with adrian re revised scheduling order; discussion with adrian and kelsey	1
3/21/2019	interviews with clients and other dashers gather documentation and review documents and recordings	4.5
3/22/2019	interviews with clients and other dashers gather documentation and review documents and recordings	3.5
3/25/2019	interviews with clients and other dashers gather documentation and review documents and recordings	4.4
3/26/2019	interviews with clients and other dashers gather documentation and review documents and recordings	6.2
3/27/2019	interviews with clients and other dashers gather documentation and review documents and recordings	4.5
3/28/2019	interviews with clients and other dashers gather documentation and review documents and recordings	3.5

3/28/2019	interviews with clients and other dashers gather documentation and review documents and recordings	4.4
-----------	--	-----

TOTAL TIME – 99.3
LODESTAR - \$31,422.50

Kelsey Kuberka, Esq. – Associate
Rate: \$425/hr

Date	Task	Hours
8/7/2018	review case file; discuss with Adrian Bacon; get up to speed on case facts for assignment of projects	2.5
8/13/2018	emails with attorneys at firm re appellate status	1.5
8/14/2018	legal research on California appellate rules	3
8/15/2018	firm discussion regarding new potential claims for case on behalf of dashers	2
8/19/2018	Review new case file; discussion with adrian bacon	1
8/30/2018	firm roundtable discussion re new potential claims	0.8
9/15/2018	roundtable findings of revisions to dasher model with firm; discuss impact on case	0.8
10/3/2018	legal and factual investigation into new potential claims for dashers; emails with firm re same; discuss with clients	3
1/9/2019	discuss case status with Adrian Bacon	0.1
2/14/2019	discussion of McGill issues in case with firm	0.3
2/25/2019	discuss case status with Adrian Bacon	0.2
3/7/2019	discuss case status with firm	0.2
3/10/2019	discuss case status with firm	0.2
3/11/2019	discuss case status with firm	0.2
3/12/2019	discuss case status with firm	0.2
3/18/2019	review marko and corona doordash arbitration files and calendars, emails with adrian re revised scheduling order; discussion with adrian and mordechai	1
3/21/2019	interviews with clients and other dashers gather documentation and review documents and recordings	6
3/22/2019	interviews with clients and other dashers gather documentation and review documents and recordings	4
3/25/2019	interviews with clients and other dashers gather documentation and review documents and recordings	5.2
3/26/2019	interviews with clients and other dashers gather documentation and review documents and recordings	3.3
3/27/2019	interviews with clients and other dashers gather documentation and review documents and recordings	7.2
3/28/2019	interviews with clients and other dashers gather documentation and review documents and recordings	5.5

3/28/2019	interviews with clients and other dashers gather documentation and review documents and recordings	3.6
4/3/2019	emails with defense re discovery and mediation	0.3
4/4/2019	draft PMK deposition notice for Adrian review; emails re same	4.8
4/5/2019	prepare for call with defense counsel; discuss prior to and after with adrian; call with defense counsel re discovery and mediation issues	1.5
4/8/2019	prepare for call with defense counsel; discuss prior to and after with adrian; call with defense counsel re discovery and mediation issues	1.5
4/9/2019	call with Adrian Bacon	0.5
4/17/2019	emails re deadlines and future projects with firm	0.3
4/18/2019	call with Adrian re mediation projects	1
4/26/2019	roundtable with firm members on McGill v Citibank issues relating to Doordash case and potential public injunctive relief claims	2
4/29/2019	emails with adrian and todd re mediation and discovery issues	0.4
5/12/2019	read Magana arbitration ruling; discuss with Adrian and Todd	2.5
5/15/2019	document review; assemble exhibits for Adrian for deposition and mediation purposes	6.5
5/16/2019	document review; assemble exhibits for Adrian for deposition and mediation purposes	5
5/17/2019	document review; assemble exhibits for Adrian for deposition and mediation purposes	7
5/20/2019	document review; assemble exhibits for Adrian for deposition and mediation purposes	4
5/21/2019	document review; assemble exhibits for Adrian for deposition and mediation purposes	5.5
5/22/2019	document review; assemble exhibits for Adrian for deposition and mediation purposes	6
5/23/2019	document review; assemble exhibits for Adrian for deposition and mediation purposes	8
5/24/2019	document review; assemble exhibits for Adrian for deposition and mediation purposes	7
9/5/2019	discuss case status and future deadlines with firm	0.5
11/5/2019	finalize PMK depo notice for adrian review; emails re same	6
11/6/2019	emails re deposition notice; further redlines per adrian instructions; finalize and serve on defense	4
11/6/2019	finalize witness list; serve on defense	0.5
11/21/2019	emails with Adrian re update to calendaring; update firm calendars in files for doordash actions	1
1/10/2021	update firm calendar	0.6

TOTAL TIME – 128.2
LODESTAR - \$54,485.00

Erika Campany – Paralegal
Rate: \$225/hr

Date	Task	Hours
4/1/2017	emails with Yoel Hanohov re new case	0.5
4/1/2017	send retainer to client; coordinate new file opening with Todd Friedman	1
4/17/2017	emails with firm re case status	0.5
4/21/2017	emails with client	0.1
4/22/2017	emails with client	0.1
4/23/2017	emails with client	0.1
4/28/2017	Discuss case with Adrian Bacon	0.4
5/1/2017	draft 226 request notice	1
5/1/2017	receipt of signed retainer agreement from Marko; update file and calendar deadlines	1.2
5/17/2017	receipt of filed complaint from filing service, update file and notify attorneys	1
7/25/2017	set up courtcall for upcoming hearing	0.5
10/30/2017	coordinate retainers with Adrian; send to clients to sign	1.5
1/8/2018	case file review status	0.5
3/5/2018	schedule courtcall for CMC	0.5
8/6/2018	review designation of record on appeal; discuss with Adrian	0.8
8/9/2018	emails re appeal and designation of record; review case file and appellate and objection record	1.3
8/13/2018	emails with attorneys at firm re appellate status	0.4
8/21/2018	prepare cover letter for paying appeal fees; coordinate filing and payment	1.2
8/21/2018	emails with Mordechai and Adrian re appeal	0.2
8/31/2018	assist with filing of amended designation of record; emails re same	1
9/5/2018	fed ex mailing of motion paperwork to administrator	0.5
9/20/2018	calendar deadlines in corona arbitration	0.5
9/21/2018	case file review; analysis of future projects and discuss with Adrian and Todd assignment of tasks	2
10/12/2018	review status of various cases for dashers; update calendar; discussion with Adrian	2.5
12/12/2018	coordinate scheduling with arbitration	0.4
4/17/2019	emails re deadlines and future projects with firm	0.3
11/21/2019	emails with Adrian re update to calendaring	0.3
11/22/2019	update firm calendar; pull Marciano docket update future hearings	1
12/6/2019	case file review status	0.5
12/16/2019	continue courtcall for hearing	0.5
3/4/2020	case file review status	0.5
4/14/2020	save documents to case file; emails with attorneys re same	0.2

7/7/2020	case file review status	0.5
12/1/2020	review minute order, emails with Adrian	0.3
12/23/2020	check office files to see if office was served with papers; discuss with Adrian	0.8
2/11/2021	schedule courtcall for hearing	0.5
4/7/2021	case file review status	0.5
4/29/2021	case file review status	0.5
6/9/2021	case file review status	0.5
7/8/2021	schedule courtcall for hearing	0.5
2/7/2018	emails with firm re scheduling and assignment of projects	0.3
2/8/2018	emails with firm re scheduling and assignment of projects	0.3
2/13/2018	emails with counsel re briefing schedule	0.1
4/10/2018	set up courtcall for upcoming hearing; calendar	0.7
4/12/2018	set up file and serve express account	0.7
4/12/2018	emails with defense re filings	0.2
8/6/2018	pull filing from docket; circulate to attorneys	0.3
8/7/2018	emails with Todd; update firm files	0.4
8/21/2018	file and serve notice of lodgment	0.7
10/30/2019	coordinate filing of ex parte application to be completed next day	0.5
10/30/2019	emails with firm	0.5
10/30/2019	schedule courtcall and email attorneys	0.5
10/31/2019	call with clerk re scheduling ex parte	0.5
2/14/2020	emails with todd friedman; update firm calendar for hearings; case and docket file review	0.8
7/10/2021	set up courtcall; emails with adrian	0.3
8/31/2021	calls with class members	0.6
8/31/2021	emails re administration	0.4
9/10/2021	emails with attorneys re costs and billings	0.4
9/13/2021	emails with attorneys re costs and billings	0.3
9/15/2021	assemble firm costs report, emails with adrian and todd re same	2
9/21/2021	finalize firm costs report; emails with adrian and todd re same	0.3
9/23/2021	communicate with clients re declarations, secure signatures from clients	0.4
9/23/2021	emails with Todd and Adrian	0.5

TOTAL TIME – 37.9
LODESTAR - \$8,527.50

Nadia Lotun – Paralegal

Rate: \$225/hr

Date	Task	Hours
4/1/2019	review case file, familiarize self with case	2
4/1/2019	emails with Adrian Bacon re arbitration deadlines and client updates	0.3
4/26/2019	emails with Adrian Bacon re filing of first amended complaint	0.2
4/26/2019	file and serve first amended complaint	1.5
6/3/2019	review case file; emails with Adrian Bacon; update clients on case status and provide details of upcoming mediation	1.5
6/14/2019	emails with clients re mediation	0.3
7/1/2019	emails with clients re mediation	0.3
7/23/2019	communications with clients about mediation	0.2
8/22/2019	communications with clients about mediation	0.2
11/7/2019	coordinate signatures on JPA	0.2
11/21/2019	coordinate gathering client signatures on settlement	2
11/21/2019	emails with todd and adrian	1
6/8/2020	coordinate gathering client signatures on declarations	1.2
7/8/2021	emails with todd and adrian; coordinate collecting signatures from clients	0.8

TOTAL TIME – 11.7

LODESTAR - \$2,632.50

Lauren Walker – Paralegal**Rate: \$225/hr**

Date	Task	Hours
10/3/2018	Review case file; discussion with adrian bacon	0.5
8/12/2019	receipt of project from adrian; extensive case file review gather documentation for his review	3.5
8/13/2019	provide results of project to Adrian Bacon	1.5
8/13/2019	client outreach to gather additional information	1.5
8/13/2019	emails with adrian re project and status	0.5
6/19/2020	docket review; monitor and pull tentative; emails with adrian and todd re same	1.5
4/5/2021	emails with Adrian re revised settlement agreement; coordinate gathering signatures from clients	2
4/7/2021	emails with Adrian re further revised settlement agreement; coordinate gathering signatures from clients	1.2
6/9/2020	emails with Adrian; download all filings from file & serve and save to file	1

TOTAL TIME – 13.2
LODESTAR - \$2,970.00

Bianca Sanches-Zinnanti – Paralegal**Rate: \$225/hr**

Date	Task	Hours
4/25/2018	emails with Todd re assignments	0.3
4/25/2018	order transcript of hearing; emails re same	0.5
5/9/2018	emails re transcript process	0.3
5/9/2018	emails re appeal and transcript of proceedings;	0.2
8/7/2018	emails with Todd	0.2
8/8/2018	emails with Todd Friedman and attorneys of firm re appeal; call clerk to address voicemail message	0.5
8/12/2018	receipt of project from Adrian Bacon	0.8
8/13/2018	research into case files of related cases; pull dockets and save to file	4

TOTAL TIME – 5.3
LODESTAR - \$1,192.50

TOTAL FIRM TIME – 4,253.80
TOTAL FIRM LODESTAR - \$3,114,872.50