IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JORGE RODRIGUEZ, individually and on behalf of all others similarly situated, Plaintiff, v. CITIMORTGAGE, INC., Defendant.	Civil Action No. 11-cv-4718 (PGG)

DECLARATION OF SCOTT A. BURSOR IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT, AND FOR AN AWARD OF ATTORNEYS' FEES, COSTS AND EXPENSES, AND AN INCENTIVE AWARD FOR THE PROPOSED CLASS REPRESENTATIVE

I, Scott A. Bursor, declare as follows:

1. I am a partner at Bursor & Fisher, P.A., one of the court-appointed Class Counsel in this action. I am an attorney at law licensed to practice in the State of New York, and I am a member of the bar of this Court. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and would testify competently thereto.

2. I make this declaration in support of Plaintiff's motion for final approval of class action settlement filed herewith, and for an award of attorneys' fees, costs and expenses, and an incentive award for the proposed class representative, Sergeant Jorge Rodriguez.

REVIEW OF THE LITIGATION

3. On July 8, 2011, my firm filed the Class Action Complaint ("Complaint") in this action, along with our co-counsel Faruqi & Faruqi, LLP and Carlson Lynch LTD (collectively, "Class Counsel"). The Complaint alleged unlawful foreclosure violations by CitiMortgage, Inc. ("CitiMortage" or "Defendant") pursuant to the Servicemembers Civil Relief Act, 50 App. U.S.C.A. § 533(c) (the "SCRA"), on behalf of Sergeant Jorge Rodriguez and all similarly

situated members of the United States Armed Forces. Sergeant Rodriguez alleged that while he was serving his country on active military duty in support of Operation Iraqi Freedom, CitiMortgage foreclosed on his mortgage, seized his real property, and sold it. Sergeant Rodriguez also alleged that he was protected by the SCRA during the foreclosure process and sale, and CitiMortgage's foreclosure sale of his property violated that law.[1] CitiMortgage answered the Complaint on September 30, 2011, denying any alleged liability or wrongdoing.

4. In August 2011, Sergeant Rodriguez moved for an order appointing his counsel as interim class counsel pursuant to Rule 23(g)(3) of the Federal Rules of Civil Procedure. The Court granted Plaintiff's motion on November 14, 2011. *See* Order, Dkt. 22.

5. Counsel for the parties attended an initial pretrial conference on November 17, 2011.

6. On November 23, 2011, Plaintiff served his first set of document requests, interrogatories, and a Rule 30(b)(6) deposition notice on Defendant. Defendant responded to the first set of written discovery on December 22, 2011.

7. On December 1, 2011, CitiMortgage served its first set of document requests and interrogatories on Sergeant Rodriguez, who responded on January 3, 2012.

8. In December 2011, the parties exchanged Rule 26(a) initial disclosures and submitted an agreed confidentiality agreement and protective order to the Court.

9. In January and February 2012, the parties produced and reviewed thousands of pages of documents, including documents concerning Plaintiff's military service, his mortgage loan file and foreclosure sale, and Defendant's SCRA compliance policies and procedures.

10. Beginning in December 2011 and through February 2012, Class Counsel noted several deficiencies with Defendant's document production. The parties met and conferred to resolve the discovery issues amicably, but certain disputes were resolved by the Court during

[1] On December 28, 2012, a First Amended Complaint was filed to conform the class definition to the terms of the parties' Settlement.

three teleconferences with Magistrate Judge Freeman from February 24, 2012 to March 29, 2012.

11. Class Counsel also conducted third-party discovery to gather evidence in furtherance of class certification and the merits.

12. On December 28, 2011, Class Counsel served subpoenas on the law firm that represented CitiMortgage in the foreclosure action, Barrett Burke Wilson Castle Daffin & Frappier, L.L.P. ("Barrett Burke"), and on the Barrett Burke employee who executed an affidavit in support of that foreclosure, Latreese Ellis. Class Counsel met and conferred with counsel for Barrett Burke and Ms. Ellis regarding objections to the subpoenas. Thereafter, Class Counsel successfully opposed a motion to quash the third party subpoenas and argued a hearing on that motion before U.S. Magistrate Judge Jeff Kaplan on March 2, 2013 in Dallas, Texas at the United States District Court for the Northern District of Texas. On March 19, 2013, Barrett Burke produced documents related to the subpoena, which were reviewed by Plaintiff's counsel and later used in three depositions in the case.

13. On February 2, 2012, Class Counsel subpoenaed PricewaterhouseCoopers, LLP ("PWC"), seeking information from PWC's review of Citibank's residential foreclosure actions or proceedings pursuant to Article VII of the April 13, 2011 OCC Consent Order. The subpoena to PWC sparked intense negotiations between the parties and PWC concerning the application of the OCC's bank examination privilege, and the discoverability of information that Defendant and PWC asserted to be protected by that privilege. These issues were briefed extensively and were the subject of multiple telephonic hearings with Magistrate Judge Freeman.

14. During March, April and May, 2012, Class Counsel conducted eight depositions of CitiMortgage and third party witnesses in five states: Maryland, Missouri, New York, Texas and West Virginia.

15. Discovery work in class actions is particularly important for the successful prosecution of a class claim. Nearly all of the relevant evidence in class action trials is in the hands of the defendant, and the key witnesses at class action trials are almost always employees

of the defendant. Thus, the discovery process is critically important to developing and presenting the class's case. Since the key witnesses are adverse to the class, the best way for the class to present their testimony at trial is through videotaped depositions. This makes it important for the lead trial lawyer to take many of the pretrial depositions. Therefore, I personally took the depositions of four key witnesses: (a) Steven Smith, CitiMortgage's Managing Director of Default and Rule 30(b)(6) designee; (b) Kathy Subleski, a CitiMortgage loss mitigation supervisor who worked on Sergeant Rodriguez's loan file; (c) April Reinhart, a CitiMortgage supervisor in the foreclosure department who worked on Sergeant Rodriguez's loan file and foreclosure; and (d) Paulette Hill, a CitiMortgage foreclosure processor who worked on Sergeant Rodriguez's loan file and foreclosure. Wherever possible, depositions were assigned to less senior lawyers who bill at lower hourly rates in order to minimize fees. My junior partner, Joseph Marchese, deposed April Wyatt, a CitiMortgage loss mitigation processor who worked on VA (Veterans Affairs) loan files. My co-counsel at the Faruqi & Faruqi firm deposed three third party witnesses, David Seybold and Brian Engel of Barrett Burke, the law firm that represented CitiMortgage in the foreclosure action on Plaintiff's home, as well as Latreese Ellis, a Barrett Burke employee who worked on Sergeant Rodriguez's foreclosure.

16. On April 26, 2012, Sergeant Rodriguez was deposed for a full day.

17. On April 27, 2012, Class Counsel served a second set of document requests on Defendant. Thereafter, CitiMortgage produced several thousand pages of additional documents.

18. Class Counsel also sought and obtained relevant information from governmental sources through Freedom Of Information Act (FOIA) requests, including one FOIA request to the Consumer Financial Protection Bureau ("CFPB") and another FOIA request to the U.S. Dept. of Housing and Urban Development ("HUD").

19. In early 2012, Class Counsel also conferred and corresponded with military officials at the Defense Manpower Data Center ("DMDC") concerning the capabilities of the Department of Defense's ("DOD's") official SCRA website, and we proposed improvements thereto which were incorporated into the roll-out of version 2.1 of the DOD's official SCRA

website. Version 2.1 of that website included improvements to the DOD's SCRA Online Verification System with new online capabilities to identify servicemembers who are protected by the SCRA's foreclosure provisions. The new online identification function uses only two or three pieces of personal servicemember information and takes seconds to complete.

20. Class Counsel also began drafting motions for class certification and summary judgment, but these motions were not filed due to the resolution of this action between the parties.

ARM'S LENGTH SETTLEMENT NEGOTIATIONS

21. While vigorously litigating this action, the parties also engaged in nearly continuous settlement negotiations. Informal settlement discussions among counsel began shortly after this action was filed and continued through December 2012.

22. Class Counsel thoroughly researched the merits of Sergeant Rodriguez's SCRA claim as well as Defendant's defenses. The information and evidence gathered through our presuit investigation, informal discovery efforts, and formal discovery put us in an excellent position to accurately assess the strengths and weaknesses of the parties' claims and defenses.

23. The parties' settlement discussions matured and gained momentum in April 2012. During April and May 2012, I had at least seven settlement discussions with Defendant's counsel. On July 17, 2012, the parties advised the Court that they had made substantial progress towards settlement of this action and were endeavoring to harmonize the DOJ Settlement implementation terms with the anticipated settlement of this action, and jointly requested a stay of the litigation to permit the parties to focus their efforts exclusively on settlement negotiations. On July 19, 2012, the Court granted the parties' request and entered an order staying this action. *See* Dkt. No. 40. Thereafter, the parties provided periodic updates to keep the Court apprised of the status of their negotiations, which continued through December 2012.

24. The terms of the proposed settlement (the "Settlement") were negotiated from April 2012 through December 2012 during telephonic conferences, in-person conferences and substantive e-mail exchanges between experienced counsel for the parties who were intimately

familiar with the legal and factual issues of the case. The negotiations were protracted, well-informed, and at times contentious.

25. The parties reached agreement on all materials aspects of the Settlement before addressing attorneys' fees and incentive fee awards for the Plaintiff.

26. Class Counsel, along with CitiMortgage's counsel, jointly drafted the Settlement Agreement and Notice Forms, and developed the notice plan. This drafting and development took significant time, effort and expertise on the part of Class Counsel, which was part of Class Counsel's effort to achieve the greatest possible benefits for the Settlement Class.

27. The parties fully executed the Settlement Agreement on December 19, 2012. On December 28, 2012, Plaintiff moved for preliminary approval of the Settlement and also filed a First Amended Class Action Complaint to conform the class definition to terms of the Settlement.

28. On January 16, 2013, the Court granted preliminary approval of the Settlement after holding a hearing on the motion earlier that day.

THE SETTLEMENT TERMS

29. Pursuant to the terms of the Settlement, Class Members may claim a monetary recovery of $116,785.00, plus the amount of any lost equity in the foreclosed property, plus interest accrued on such lost equity calculated from the date of the foreclosure sale. Settlement Agreement at 13-14, Marchese Decl., Dkt. No. 39, Ex. A. Here, the Class List contains 379 Servicemember borrowers comprising the proposed Settlement Class. The Class List also reflects a total available monetary recovery to the proposed Settlement Class members of $38,204,690.17. In addition, Defendant agreed to pay the costs of notice and administration as well as reasonable counsel fees and costs for Class Counsel. *See* Settlement Agreement at 7-8, 18.

30. The proposed Settlement was harmonized with a similar settlement between CitiMortgage and the United States Department of Justice, (the "DOJ Settlement"). The Settlement required CitiMortgage to submit all foreclosure sales from January 1, 2006 through

June 30, 2012 for Servicemembers Civil Relief Act foreclosure compliance review under the terms of the DOJ Settlement. *See id.* at 7. The review was conducted by a Third Party Consultant, PriceWaterhouseCoopers LLP ("PwC"). *See id.* at 6-7, 9-13. The results of that review were checked during a related DOJ Foreclosure Review process, which then resulted in the creation of a Class List of 379 Servicemember borrowers (and their respective SCRA mortgage loans) who were protected by the SCRA at the time of their foreclosure sale. *Id.* at 3, 7, 12. Individual notice was sent by first class mail to the Servicemember borrowers identified in the Class List, after updating all addresses through a national change of address service, and reasonable address traces were performed for all Class Notices returned as undeliverable. *Id.* at 8-9. Class notice was disseminated on a rolling basis in accordance with the finalization of the DOJ Foreclosure Review process. Class notice was sent to 95 Settlement Class members from the non-judicial loan population on January 23, 2015 and was sent to 31 additional members of the non-judicial loan population on March 19, 2015. Class notice was sent to 196 Settlement Class members from the judicial loan population on August 17, 2015. Class notice was sent to a further 25 Settlement Class members from the judicial loan population and 31 Settlement Class members from the non-judicial loan population on August 20, 2015. Lastly, class notice was sent to one more judicial Settlement Class member on August 24, 2015. No objections or opt-outs have been received from these class members to date.

31. During the course of the PwC and DOJ foreclosure reviews, which were fully completed on July 14, 2015, Class Counsel regularly met and conferred with Defendant's counsel and the DOJ by telephone and in correspondence to monitor the progress of the foreclosure reviews and the creation of the Class List.

32. On July 1, 2013 and on February 10, 2014, my partner, Joseph Marchese, wrote to the Court to request a status conference for the purpose of monitoring the progress of the Settlement. The Court convened an in-person conference on April 17, 2014 to discuss progress with the Settlement. Thereafter, Class Counsel and the Court received five 90-day Settlement update letters from Defendant. Class Counsel continues to maintain regular contact with

Defendant's counsel to monitor settlement progress and administration. Defendant's counsel made the Class List available to Class Counsel for inspection beginning on August 25, 2015.

33. Given the size of the individual recoveries for class members, which average more than $100,000 per class member, and include some claims exceeding $200,000, we expect there will be 100% participation by eligible class members.

THE SETTLEMENT IS FAIR, REASONABLE, AND ADEQUATE

34. Plaintiff faced a number of risks and significant expenses if he sought relief for the Settlement Class through continued litigation. For example, the next step in litigation would have been costly expert discovery followed by contested motions for class certification and summary judgment. While a class has been conditionally certified in this case, securing class certification after a contested motion and maintaining it through trial carries risk. Moreover, there is no doubt that CitiMortgage has the resources to contest this case to the end. However, the Settlement removes the risks of litigation and simultaneously provides monetary relief for Sergeant Rodriguez and the Settlement Class.

35. Although it took longer than expected to complete the foreclosure reviews and create the Class List, the benefits of this proposed Settlement will still likely have been distributed more promptly than the award from any verdict had the case proceeded to judgment through trial and/or appeals.

36. Although individual notice was sent by first class mail to 95 Settlement Class members on January 23, 2015, and was sent to 31 additional Settlement Class members on March 19, 2015, there have been no objections or opt-outs from the Settlement. And the time for those Settlement Class members to object or exclude themselves has expired. Class notice was also sent to 196 Settlement Class members from the judicial loan population on August 17, 2015. Class notice was sent to a further 25 Settlement Class members from the judicial loan population and 31 Settlement Class members from the non-judicial loan population on August 20, 2015. Lastly, class notice was sent to one more judicial Settlement Class member on August 24, 2015.

No objections or opt-outs have been received from these class members to date. Therefore, the reaction of the Settlement Class also supports the reasonableness of the Settlement.

37. The expertise and experience of Class Counsel and their views are other important factors to consider in assessing the reasonableness of the proposed Settlement, including the payment of attorneys' fees and costs as set forth in the Settlement Agreement. As indicated in the firm resumes attached to Class Counsel's declarations in support of the Settlement, Class Counsel are experienced practitioners in the consumer class action field. It is the collective opinion of Class Counsel that the proposed Settlement is fair, reasonable, and adequate and should be approved by the Court. A copy of my firm's resume, which includes detailed information about our practice and the qualifications of the lawyers who worked on this case is attached as **Exhibit A**.

CLASS COUNSEL'S LODESTAR AND EXPENSES ARE REASONABLE

38. In recognition of the efforts by Class Counsel and the benefits provided to the Settlement Class through the Settlement, I respectfully request that the Court approve a payment of an award of attorneys' fees and costs in the amount of $3,525,000.00. CitiMortgage has agreed to pay this amount subject to the Court's approval. This amount is fair to the Settlement Class and warrants Court approval. This fee request is within the range of fees customarily awarded in similar actions and is justified in light of the substantial monetary benefits conferred on the Settlement Class, the risks undertaken, and the quality and extent of the legal work performed, as set forth herein and in the accompanying moving papers. Moreover, the requested award of attorneys' fees and costs is payable by the Defendant in addition to and not from the relief provided to the Settlement Class under the Settlement.

39. Attached hereto as **Exhibit B** are my firm's detailed billing diaries for this matter. I have personally reviewed all of my firm's time entries associated with this case, and have used billing judgment to ensure that duplicative or unnecessary time has been excluded and that only time reasonably devoted to the litigation has been included. My firm's time entries were

regularly and contemporaneously recorded by me and the other timekeepers pursuant to firm policy and have been maintained in the computerized records of my firm.

40. As of September 2, 2015, Bursor & Fisher expended 1,454.8 hours in this case. Bursor & Fisher's lodestar fee in this case, based on current billing rates, is $948,115.00.

41. In addition to the time enumerated above, I estimate that Class Counsel will incur an additional 50 hours of future work in connection with the fairness hearing, coordinating with the Settlement Administrator, monitoring settlement administration, and responding to Settlement Class member inquiries.

42. To date, my law firm also expended $101,199.00 in out-of-pocket expenses in connection with the prosecution of this case. Attached as **Exhibit C** is an itemized list of those expenses. These expenses are reflected in the records of Bursor & Fisher, and were necessary to prosecute this litigation. Expense items are billed separately and such charges are not duplicated in my firm's billing rates.

43. The requested attorneys' fee award amounts to 8.9% of the total value of the Settlement.

44. Based on my knowledge and experience, the hourly rates charged by my firm are within the range of market rates charged by attorneys of equivalent experience, skill, and expertise. These are the same hourly rates that we actually charge to our regular hourly clients who have retained us for non-contingent matters, and which are actually paid by those clients. As a matter of firm policy, we do not discount our regular hourly rates for non-contingent hourly work. I have personal knowledge of the range of hourly rates typically charged by counsel in our field in New York, California, and throughout the United States, both on a current basis and in the past. In determining my firm's hourly rates from year to year, my partners and I have consciously taken market rates into account and have aligned our rates with the market.

45. Through my practice, I have become familiar with the non-contingent market rates charged by attorneys in New York, California and elsewhere (my firm's offices are in New York City and Walnut Creek, California). This familiarity has been obtained in several ways:

(a) by litigating attorneys' fee applications; (b) by discussing fees with other attorneys; (c) by obtaining declarations regarding prevailing market rates filed by other attorneys seeking fees; and (d) by reviewing attorneys' fee applications and awards in other cases, as well as surveys and articles on attorneys' fees in the legal newspapers and treatises. The information I have gathered shows that my firm's rates are in line with the non-contingent market rates charged by attorneys of reasonably comparable experience, skill, and reputation for reasonably comparable class action work. In fact, comparable hourly rates have been found reasonable by various courts for reasonably comparable services, including:

a. *In re TFT-LCD (Flat Panel) Antitrust Litigation* (N.D.Cal. 2013) No. M 07 1827 SI, MDL, No. 1827, an antitrust class action, in which the the court found blended hourly rates of $1000, $950, $861, $825, $820, and $750 per hour reasonable for the lead class counsel.

b. *Williams v. H&R Block Enterprises, Inc.* Alameda County Superior Ct. No. RG08366506, Order of Final Approval and Judgment filed November 8, 2012, a wage and hour class action, in which the court found the hourly rates of $785, $775, and $750 reasonable for the more senior class counsel.

c. *Luquetta v. The Regents of the Univ. of California*, San Francisco Superior Ct. No.CGC-05-443007, Order Granting Plaintiff's Motion for Common Fund Attorneys' Fees and Expenses, filed October 31, 2012, a class action to recover tuition overcharges, in which the court found the hourly rates of $850, 785, and 750, and 700 reasonable for plaintiffs' more experienced counsel.

d. *Pierce v. County of Orange* (C.D. Cal. 2012) 905 F.Supp.2d 1017, a civil rights class action brought by pre-trial detainees, in which the court approved a lodestar-based, *inter alia,*on 2011 rates of $850 and $825 per hour.

e. *Holloway et. al. v. Best Buy Co., Inc.* (N.D. Cal. 2011) No. 05-5056 PJH (Order dated November 9, 2011), a class action alleging that Best Buy discriminated against female, African American and Latino employees by

denying them promotions and lucrative sales positions, in which the court approved lodestar-based rates of up to $825 per hour.

f. *Californians for Disability Rights, Inc., et al. v. California Department of Transportation, et al.* (N.D.Cal. 2010) 2010 U.S.Dist.LEXIS 141030, adopted by Order Accepting Report and Recommendation filed February 2, 2011, a class action in which the court found reasonable 2010 hourly rates of up to $835 per hour.

g. *Credit/Debit Card Tying Cases*, San Francisco County Superior Court, JCCP No. 4335, Order Granting Plaintiffs' Motion for Attorneys' Fees, Expenses, and Incentive Awards, filed August 23, 2010, an antitrust class action, in which the court, before applying a 2.0 lodestar multiplier, found reasonable 2010 hourly rates of $975 for a 43-year attorney, $950 for a 46-year attorney, $850 for 32 and 38 year attorneys, $825 for a 35-year attorney, $740 for a 26-year attorney, $610 for a 13-year attorney, and $600 for a 9-year attorney, and $485 for a 5-year attorney.

h. *Qualcomm, Inc. v. Broadcom, Inc.* Case No. 05-CV-1958-B, 2008 WL 2705161 (S.D. Cal. 2008), in which the court found the 2007 hourly rates requested by Wilmer Cutler, Pickering, Hale & Dorr LLP reasonable; those rates ranged from $45 to $300 for staff and paralegals, from $275 to $505 for associates and counsel, and from $435 to $850 for partners.

The reasonableness of my firm's hourly rates are also supported by several surveys of legal rates, including the following:

i. In an article entitled " On Sale: The $1,150-Per Hour Lawyer," written by Jennifer Smith and published in the Wall Street Journal on April 9, 2013, the author describes the rapidly growing number of lawyers billing at $1,150 or more revealed in public filings and major surveys. The article also notes that in the first quarter of 2013, the 50 top-grossing law firms billed their partners

at an average rate between $879 and $882 per hour. A true and correct copy of this article is attached hereto as **Exhibit D**.

j. In an article published April 16, 2012, the Am Law Daily described the 2012 Real Rate Report, an analysis of $7.6 billion in legal bills paid by corporations over a five-year period ending in December 2011. A true and correct copy of that article is attached hereto as **Exhibit E**. That article confirms that the rates charged by experienced and well-qualified attorneys have continued to rise over this five-year period, particularly in large urban areas like the San Francisco Bay Area. It also shows, for example, that the top quartile of lawyers bill at an *average* of "just under $900 per hour."

k. Similarly, on February 25, 2011, the Wall Street Journal published an on-line article entitled "Top Billers." A true and correct copy of that article is attached hereto as **Exhibit F**. That article listed the 2010 and/or 2009 hourly rates for more than 125 attorneys, in a variety of practice areas and cases, who charged $1,000 per hour or more. Indeed, the article specifically lists *eleven* (11) Gibson Dunn & Crutcher attorneys billing at $1,000 per hour or more.

l. The National Law Journal's December 2010, nationwide sampling of law firm billing rates (**Exhibit G**) lists 32 firms whose highest rate was $800 per hour or more, eleven firms whose highest rate was $900 per hour or more, and three firms whose highest rate was $1,000 per hour or more.

m. On December 16, 2009, The American Lawyer published an online article entitled "Bankruptcy Rates Top $1,000 in 2008-2009." That article is attached hereto as **Exhibit H**. In addition to reporting that several attorneys had charged rates of $1,000 or more in bankruptcy filings in Delaware and the Southern District of New York, the article also listed 18 firms that charged median partner rates of from $625 to $980 per hour.

n. According to the National Law Journal's 2014 Law Firm Billing Survey, law firms with their largest office in New York have average partner and associate billing rates of $882 and $520, respectively. Karen Sloan, *$1,000 Per Hour Isn't Rare Anymore; Nominal Billing Levels Rise, But Discounts Ease Blow*, National Law Journal, Jan. 13, 2014. The survey also shows that it is common for legal fees for partners in New York firms to exceed $1,000 an hour. *Id.* A true and correct copy of this survey is attached hereto as **Exhibit I**.

46. Given my unique experience and track record of success winning 5 of 5 class action trials, since 2012 my hourly rate has been set at $850, which is the same rate that my firm charges to clients who retain us on an hourly basis, and which we never discount. This rate has been deemed reasonable in connection with the approval of my firm's fee applications in at least five recent matters:

a. *Correa v. Sensa Products LLC*, Case No. BC476808, California Superior Court, Los Angeles County (Nov. 9, 2012 Judgment, Final Order, And Decree Granting Final Approval To Class Action Settlement);

b. *Rossi v. The Procter & Gamble Co.*, Case No. 11-7238, D.N.J. (October 3, 2013 Final Approval Order And Judgment);

c. *In re Pacific Bell Late Fee Litigation*, Case No. MSC10-00840, California Superior Court, Los Angeles County (Oct. 22, 2013 Order Awarding Attorneys' Fees, Costs And Expenses And Authorizing Payment Of Incentive Award To The Class Representative);

d. *In re Haier Freezer Consumer Litig.*, Case No. C11-02911 EJD, N.D. Cal. (Oct. 25, 2013 Final Judgment And Order Granting Plaintiffs' Motion For Final Approval Of Class Action Settlement And For Award Of Attorneys' Fees, Costs And Incentive Awards); and

e. *In re: Kangadis Food Inc. d/b/a/ The Gourmet Factory*, Case No. 14-72649 (REG), Bankr. E.D.N.Y. (Dec. 17, 2014 Order Granting Motion for Award of Attorneys' Fees, Costs and Expenses To Class Counsel And Incentive Awards To The Class Representatives).

No court has ever cut my firm's fee application by a single dollar on the ground that our hourly rates were not reasonable. Nor on any other ground.

47. My firm undertook this representation on a wholly contingent basis recognizing that the risk of non-payment has been high throughout this litigation. There were substantial uncertainties in the viability of this case as a class action. Although we believed the case to be meritorious, a realistic assessment shows that the risks inherent in the resolution of the liability issues are significant.

48. Had we not successfully negotiated this Settlement with the Defendant, we would have vigorously prosecuted this case to a trial verdict. We were therefore at great risk for non-payment. In addition, as described above, we have advanced significant expenses that would not have been reimbursed absent a successful result.

SERGEANT RODRIGUEZ'S ROLE IN THIS LITIGATION

49. Pursuant to the Settlement Agreement, Sergeant Rodriguez is permitted to request approval of a total settlement payment of $166,785.00 for his service as Class Representative, which includes a $41,785 incentive award above the base amount of his individual claim.

50. Incentive awards for class representatives are common in class actions. *See, e.g.*, *In re Vitamin C Antitrust Litig.*, 2012 U.S. Dist. LEXIS 152275, at *35 (E.D.N.Y. Oct. 22, 2012) ("Courts often grant incentive awards to representative plaintiffs."); *see also Dupler v. Costco Wholesale Corp.*, 705 F.Supp.2d 231, 245 (E.D.N.Y. 2010) (approving $25,000 and $5,000 awards to two plaintiffs in a settlement involving allegations that the defendant's backdating of membership renewals was a deceptive practice under New York's consumer fraud statute); *In re Domestic Air Transportation Antitrust Litigation*, 148 F.R.D. 297, 348 (N.D. Ga. 1993) ($142,500 awarded from settlement fund of $50 million); *In re Dun & Bradstreet Credit Services*

Customer Litigation, 130 F.R.D. 366, 373-74 (S.D. Ohio 1990) ($215,000 awarded from settlement fund of $18 million); *Spicer v. Chicago Board Options Exchange, Inc.*, 844 F. Supp. 1226, 1267-68 (N.D. Ill. 1993) ($30,000 awarded from settlement fund of $10 million); *Enterprise Energy Corp. v. Columbia Gas Transmission Corp.*, 37 F.R.D. 240, 250-51 (S.D. Ohio 1991) (approving $50,000 incentive awards). Such awards compensate class representatives and others for actual costs in time, money, and the disruption of life incurred in the prosecution of the litigation. They also serve to encourage future plaintiffs to come forward and vindicate the rights of other injured parties.

51. Here, the involvement of the Sergeant Rodriguez was critical to the prosecution of the case. Throughout the litigation, Sergeant Rodriguez held regular meetings with Class Counsel to receive updates on the progress of the case and to discuss strategy. He assisted in Class Counsel's three-month pre-suit investigation by discussing his relevant experiences and providing necessary back-up documentation including real property records and military orders, among other things. Sergeant Rodriguez assisted in drafting the Complaint, and he reviewed the Complaint for accuracy before it was filed. Sergeant Rodriguez coordinated with my firm to form responses to all discovery requests proffered by Defendant, including written interrogatories and documents requests, and he gathered documents for production. Moreover, Sergeant Rodriguez sat for a day-long deposition. Finally, he was intimately involved in the settlement process, and has continued to keep abreast of settlement progress to date.

52. Sergeant Rodriguez also took significant time away from work and personal activities to initiate and litigate this action, which was filed in July 2011. He was prepared to litigate this case to a verdict if necessary. His dedication and efforts have conferred a significant benefit on hundreds of military servicemembers across the United States. In light of his contributions and efforts, an incentive award of $41,785 to Sergeant Rodriguez for acting as Class Representative is appropriate and should be approved.

I declare under the penalty of perjury under the law of the State of New York that the foregoing is true and correct, executed on September 4, 2015 at New York, New York.

/s/ Scott A. Bursor

Scott A. Bursor

EXHIBIT A

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FIRM RESUME

With offices in New York and California, BURSOR & FISHER lawyers have represented both plaintiffs and defendants in state and federal courts throughout the country.

The lawyers at our firm have an active civil trial practice, having won multi-million dollar verdicts or recoveries in five of five civil jury trials since 2008. Our most recent trial victory came in August 2013 in *Ayyad v. Sprint Spectrum L.P.*, in which Mr. Bursor served as lead trial counsel and won a jury verdict defeating Sprint's $1.06 billion counterclaim and securing the class's recovery of more than $275 million in cash and debt relief.

In *Thomas v. Global Vision Products, Inc. (II)*, we obtained a $50 million jury verdict in favor of a certified class of 150,000 purchasers of the Avacor Hair Regrowth System. The legal trade publication VerdictSearch reported that this was the second largest jury verdict in California in 2009, and the largest in any class action.

The lawyers at our firm have an active class action practice and have won numerous appointments as class counsel to represent millions of class members, including customers of Verizon Wireless, AT&T Wireless, Cingular Wireless, Sprint, T-Mobile, General Electric, Haier America, and Michaels Stores as well as purchasers of Avacor™, Xenadrine™, and Sensa™ products. Since 2014, our lawyers have certified four consumer classes pursuant to contested class certification motions (*see Ebin*, *Forcellati*, *In re EZ Seed Litig.*, and *Dei Rossi infra*). Since December 2010, Bursor & Fisher lawyers have been court-appointed Class Counsel or Interim Class Counsel in:

i. *O'Brien v. LG Electronics USA, Inc.* (D.N.J. Dec. 16, 2010) to represent a certified nationwide class of purchasers of LG French-door refrigerators,

ii. *Ramundo v. Michaels Stores, Inc.* (N.D. Ill. June 8, 2011) to represent a certified nationwide class of consumers who made in-store purchases at Michaels Stores using a debit or credit card and had their private financial information stolen as a result,

iii. *In re Haier Freezer Consumer Litigation* (N.D. Cal. Aug. 17, 2011) to represent a certified class of purchasers of mislabeled freezers from Haier America Trading, LLC,

iv. *Loreto v. Coast Cutlery Co.* (D.N.J. Sep. 8, 2011) to represent a certified nationwide class of purchasers of knives or tools made by Coast Cutlery,

v. *Rodriguez v. CitiMortgage, Inc.* (S.D.N.Y. Nov. 14, 2011) to represent a certified nationwide class of military personnel against CitiMortgage for illegal foreclosures,

vi. *Avram v. Samsung Electronics America, Inc., et al.* (D.N.J. Jan. 3, 2012), to represent a proposed nationwide class of purchasers of mislabeled refrigerators from Samsung Electronics America, Inc. and Lowe's Companies, Inc.,

vii. *Rossi v. The Procter & Gamble Co.* (D.N.J. Jan. 31, 2012), to represent a certified nationwide class of purchasers of Crest Sensitivity Treatment & Protection toothpaste,

viii. *Dzielak v. Whirlpool Corp. et al.* (D.N.J. Feb. 21, 2012), to represent a proposed nationwide class of purchasers of mislabeled Maytag Centennial washing machines from Whirlpool Corp., Sears, and other retailers,

ix. *In re Sensa Weight Loss Litig.* (N.D. Cal. Mar. 2, 2012), to represent a certified nationwide class of purchasers of Sensa weight loss products,

x. *In re Sinus Buster Products Consumer Litig.* (E.D.N.Y. Dec. 17, 2012) to represent a certified nationwide class of purchasers of Sinus Buster products,

xi. *Scott v. JPMorgan Chase & Co., et al.* (S.D.N.Y. May 30, 2013) to represent a proposed nationwide class of Chase customers who were allegedly unilaterally enrolled into Chase's Overdraft Protection service and charged unauthorized fees,

xii. *Podobedov v. Living Essentials, LLC*, (C.D. Cal. Nov. 8, 2013) to represent a proposed nationwide class of purchasers of 5-hour Energy products,

xiii. *Ebin v. Kangadis Food Inc.*, (S.D.N.Y. Feb. 25, 2014) to represent a certified nationwide class of purchasers of Capatriti 100% Pure Olive Oil,

xiv. *Forcellati v. Hyland's, Inc.*, (C.D. Cal. Apr. 9, 2014) to represent a certified nationwide class of purchasers of children's homeopathic cold and flu remedies,

xv. *Ebin v. Kangadis Family Management LLC, et al.*, (S.D.N.Y. Sept. 18, 2014) to represent a certified nationwide class of purchasers of Capatriti 100% Pure Olive Oil,

xvi. *Melgar v. Zicam LLC, et al.* (E.D. Cal. Oct. 29, 2014) to represent a proposed nationwide class of purchasers of homeopathic cold remedy,

xvii. *In re Scotts EZ Seed Litig.* (S.D.N.Y. Jan. 26, 2015), to represent a certified class of purchasers of Scotts Turf Builder EZ Seed,

xviii. *Dei Rossi v. Whirlpool Corp., et al.* (E.D. Cal. Apr. 28, 2015), to represent a certified class of purchasers of mislabeled KitchenAid refrigerators from Whirlpool Corp., Best Buy, and other retailers, and

xix. *Hendricks v. Starkist Co.*, (N.D. Cal. July 23, 2015) to represent a certified nationwide class of purchasers of Starkist tuna products.

SCOTT A. BURSOR

Mr. Bursor has an active civil trial practice, having won multi-million verdicts or recoveries in five of five civil jury trials since 2008. Mr. Bursor's most recent victory came in August 2013 in *Ayyad v. Sprint Spectrum L.P.*, in which he served as lead trial counsel and won a jury verdict defeating Sprint's $1.06 billion counterclaim and securing the class's recovery of more than $275 million in cash and debt relief.

In *Thomas v. Global Vision Products, Inc.* (2009), the jury returned a $50 million verdict in favor of the plaintiff and class represented by Mr. Bursor. The legal trade publication VerdictSearch reported that this was the second largest jury verdict in California in 2009.

Class actions are rarely tried to verdict. Other than Mr. Bursor and his partner Mr. Fisher, we know of no lawyer that has tried more than one class action to a jury. Mr. Bursor's perfect record of five wins in five class action jury trials, with recoveries ranging from $21 million to $299 million, is unmatched by any other lawyer. Each of these victories was hard-fought against top trial lawyers from the biggest law firms in the United States.

Mr. Bursor graduated from the University of Texas Law School in 1996. He served as Articles Editor of the Texas Law Review, and was a member of the Board of Advocates and Order of the Coif. Prior to starting his own practice, Mr. Bursor was a litigation associate with Cravath, Swaine & Moore (1996-2000) and Chadbourne & Parke LLP (2001), where he represented large telecommunications, pharmaceutical, and technology companies in commercial litigation.

Mr. Bursor is a member of the state bars of New York, Florida, and California, as well as the bars of the United States Court of Appeals for the Second Circuit, United States Court of Appeals for the Third Circuit, United States Court of Appeals for the Fourth Circuit, United States Court of Appeals for the Sixth Circuit, United States Court of Appeals for the Ninth Circuit, United States Court of Appeals for the Eleventh Circuit, United States District Courts for the Southern and Eastern Districts of New York, United States District Courts for the Northern, Central, Southern and Eastern Districts of California, and the United States District Courts for the Southern and Middle Districts of Florida.

Representative Cases

Mr. Bursor was appointed lead or co-lead class counsel to the largest, 2nd largest, and 3rd largest classes ever certified. Mr. Bursor has represented classes including more than 160 million class members, roughly 1 of every 2 Americans. Listed below are recent cases that are representative of Mr. Bursor's practice:

Mr. Bursor negotiated and obtained court-approval for two landmark settlements in *Nguyen v. Verizon Wireless* and *Zill v. Sprint Spectrum* (the largest and 2nd largest classes ever certified). These settlements required Verizon and Sprint to open their wireless networks to third-party devices and applications. These settlements are believed to be the most significant legal development affecting the telecommunications industry since 1968, when the FCC's Carterfone decision similarly opened up AT&T's wireline telephone network.

Mr. Bursor was the lead trial lawyer in *Ayyad v. Sprint Spectrum, L.P.* representing a class of approximately 2 million California consumers who were charged an early termination fee under a Sprint cellphone contract, asserting claims that such fees were unlawful liquidated damages under the California Civil Code, as well as other statutory and common law claims. After a five-week combined bench-and-jury trial, the jury returned a verdict in June 2008 and the Court issued a Statement of Decision in December 2008 awarding the plaintiffs $299 million in cash and debt cancellation. Mr. Bursor served as lead trial counsel for this class again in 2013 during a month-long jury trial in which Sprint asserted a $1.06 billion counterclaim against the class. Mr. Bursor secured a verdict awarding Sprint only $18.4 million, the exact amount calculated by the class's damages expert. This award was less than 2% of the damages Sprint sought, less than 6% of the amount of the illegal termination fees Sprint charged to class members, and ensured that the class would recover in excess of $275 million.

Mr. Bursor was the lead trial lawyer in *White v. Cellco Partnership d/b/a Verizon Wireless* representing a class of approximately 1.4 million California consumers who were charged an early termination fee under a Verizon cellphone contract, asserting claims that such fees were unlawful liquidated damages under the California Civil Code, as well as other statutory and common law claims. In July 2008, after Mr. Bursor presented plaintiffs' case-in-chief, rested, then cross-examined Verizon's principal trial witness, Verizon agreed to settle the case for a $21 million cash payment and an injunction restricting Verizon's ability to impose early termination fees in future subscriber agreements.

Mr. Bursor was the lead trial lawyer in *Thomas v. Global Visions Products Inc.* Mr. Bursor represented a class of approximately 150,000 California consumers who had purchased the Avacor® hair regrowth system. In January 2008, after a four-week combined bench-and-jury trial. Mr. Bursor obtained a $37 million verdict for the class, which the Court later increased to $40 million.

Mr. Bursor was appointed class counsel and was elected chair of the Official Creditors' Committee in *In re Nutraquest Inc.*, a Chapter 11 bankruptcy case before Chief Judge Garrett E. Brown, Jr. (D.N.J.) involving 390 ephedra-related personal injury and/or wrongful death claims, two consumer class actions, four enforcement actions by governmental agencies, and multiple adversary proceedings related to the Chapter 11 case. Working closely with counsel for all parties and with two mediators, Judge Nicholas Politan (Ret.) and Judge Marina Corodemus (Ret.), the committee chaired by Mr. Bursor was able to settle or otherwise resolve every claim and reach a fully consensual Chapter 11 plan of reorganization, which Chief Judge Brown approved in late 2006. This settlement included a $12.8 million recovery to a nationwide class of consumers who alleged they were defrauded in connection with the purchase of Xenadrine® dietary supplement products.

Mr. Bursor was the lead trial lawyer in *In re: Pacific Bell Late Fee Litigation*. After filing the first class action challenging Pac Bell's late fees in April 2010, winning a contested motion to certify a statewide California class in January 2012, and defeating Pac Bell's motion for summary judgment in February 2013, Mr. Bursor obtained final approval of the $38 million class settlement. The settlement, which Mr. Bursor negotiated the night before opening statements were scheduled to commence, provides for a $20 million cash payment to provide

refunds to California customers who paid late fees on their Pac Bell wireline telephone accounts, and includes an injunction that will reduce late fee charges by $18.6 million over 28 months.

L. TIMOTHY FISHER

Mr. Fisher has an active practice in consumer class actions and complex business litigation and has also successfully handled a large number of civil appeals. Prior to founding Bursor & Fisher, P.A. in 2011, Mr. Fisher was an associate with Bramson, Plutzik, Mahler & Birkhaeuser, LLP in Walnut Creek, California for 13 years. During his career, he has been actively involved in numerous cases that resulted in multi-million dollar recoveries for consumers and investors. Mr. Fisher has handled cases involving a wide range of issues including nutritional labeling, health care, telecommunications, corporate governance, unfair business practices and consumer fraud. With his partner Scott A. Bursor, Mr. Fisher has tried four class action jury trials, all of which produced successful results. In the initial phase of *Thomas v. Global Vision Products*, the jury awarded the plaintiff class more than $36 million plus punitive damages, while the Court awarded a $40 million recovery on separate legal claims. In a subsequent phase of the trial against individual defendants, Mr. Fisher and Mr. Bursor obtained a jury award of $50,024,611 – the largest class action award in California in 2009 and the second-largest jury award of any kind.

Mr. Fisher was admitted to the State Bar of California in 1997. He is also a member of the bars of the United States Court of Appeals for the Ninth Circuit and the United States District Courts for the Northern, Central, Southern and Eastern Districts of California. Mr. Fisher taught appellate advocacy at John F. Kennedy University School of Law in 2003 and 2004. Recently, Mr. Fisher contributed jury instructions, a verdict form, and comments to the consumer protection chapter of Justice Elizabeth A. Baron's *California Civil Jury Instruction Companion Handbook* (West 2010). In 2014, Mr. Fisher was appointed to a four-year term as a member of the Standing Committee on Professional Conduct for the United States District Court for the Northern District of California.

Mr. Fisher received his Juris Doctor from Boalt Hall at the University of California at Berkeley in 1997. While in law school, he was an active member of the Moot Court Board and participated in moot court competitions throughout the United States. In 1994, Mr. Fisher received an award for Best Oral Argument in the first year moot court competition. In 1992, Mr. Fisher graduated with highest honors from the University of California at Berkeley and received a degree in political science. Prior to graduation, he authored an honors thesis for Professor Bruce Cain entitled "The Role of Minorities on the Los Angeles City Council." He is also a member of Phi Beta Kappa.

Representative Cases

- *Thomas v. Global Vision Products, Inc.* (Alameda County Superior Court) - Mr. Fisher litigated claims against Global Vision Products, Inc. and other individuals in connection with the sale and marketing of a purported hair loss remedy known as Avacor. The case lasted more than seven years and involved two trials. The first trial resulted in a verdict for plaintiff and the class in the amount of $40,000,000. The second trial resulted in a jury verdict of $50,024,611, which led to a $30 million settlement for the class.

- *In re Cellphone Termination Fee Cases* - Handset Locking Actions (Alameda County Superior Court). Mr. Fisher actively worked on five coordinated cases challenging the secret locking of cell phone handsets by major wireless carriers to prevent consumers from activating them on competitive carriers' systems. Settlements have been approved in all five cases on terms that require the cell phone carriers to disclose their handset locks to consumers and to provide unlocking codes nationwide on reasonable terms and conditions. The settlements fundamentally changed the landscape for cell phone consumers regarding the locking and unlocking of cell phone handsets.

- *In re Cellphone Termination Fee Cases* - Early Termination Fee Cases (Alameda County Superior Court and Federal Communications Commission). In separate cases that are a part of the same coordinated litigation as the Handset Locking Cases, Mr. Fisher actively worked on claims challenging the validity under California law of early termination fees imposed by national cell phone carriers. In one of those cases, against Verizon Wireless, a nationwide settlement was reached after three weeks of trial in the amount of $21 million. In a second case, which was tried to verdict, the Court held after trial that the $73 million of flat early termination fees that Sprint had collected from California consumers over an eight-year period were void and unenforceable.

- *Guyette v. Viacom, Inc.* (Alameda County Superior Court) - Mr. Fisher was co-counsel for a class of cable television subscribers who alleged that the defendant had improperly failed to share certain tax refunds with its subscribers. A settlement was negotiated shortly before trial under which defendants paid the class $13 million in cash.

- *In re Haier Freezer Consumer Litigation* (Northern District of California) - Mr. Fisher filed the case in June 2011 and alleged that Haier had misrepresented the energy consumption of its HNCM070E freezer on the ENERGYGUIDE labels attached to the freezers. After two years of litigation, District Judge Edward J. Davila approved a nationwide settlement valued at $4 million, which provides for cash payments of between $50 and $325.80 to class members who purchased the Haier HNCM070E chest freezer.

Selected Published Decisions

- *In re Cellphone Termination Fee Cases*, 186 Cal.App.4th 1380 (2010)

- *In re Cellphone Termination Fee Cases*, 180 Cal.App.4th 1110 (2009)

- *Gatton v. T-Mobile USA, Inc.*, 152 Cal.App.4th 571 (2007)

JOSEPH I. MARCHESE

Mr. Marchese is a Partner with Bursor & Fisher, P.A. Mr. Marchese focuses his practice on complex business litigation, consumer class actions, and employment law disputes. Prior to joining Bursor & Fisher, Mr. Marchese was an associate with DLA Piper and Shearman & Sterling where he litigated complex commercial matters on behalf of investment banks, pharmaceutical companies, insurance carriers, food manufacturers, and tobacco companies.

Mr. Marchese is admitted to the State Bar of New York and is a member of the bars of the United States District Courts for the Southern District of New York and the Eastern District of New York, as well as the United States Court of Appeals for the Second Circuit.

Mr. Marchese graduated from Boston University School of Law in 2002 where he was a Member of The Public Interest Law Journal. In 1998, Mr. Marchese graduated with honors from Bucknell University where he earned a B.S.B.A.

Representative Cases

- *Rossi v. The Procter & Gamble Co.* (District of New Jersey) – Mr. Marchese filed the first nationwide consumer class action lawsuit alleging Crest Sensitivity Treatment & Protection toothpaste ("CSTP") was not effective as advertised, and was essentially identical to an existing brand called Crest Pro-Health toothpaste, with only three differentiating features: (1) claims of rapid relief for tooth sensitivity on the product packaging; (2) a different coloring additive; and (3) a 75% price premium over Crest Pro-Health. The plaintiff defeated defendant's motion to dismiss before negotiating a settlement with P&G. District Judge Jose L. Linares granted final approval of the nationwide class settlement which provides class members with a monetary refund of at least $4.00 per tube of CSTP.

- *In Re Michaels Stores Pin Pad Litigation* (Northern District of Illinois) – Mr. Marchese filed the first nationwide consumer class action against Michaels Stores concerning a data breach that resulted in the unauthorized release of customers' financial data. He actively litigated claims that Michaels failed to secure customer personal financial data appropriately, and failed to provide adequate notice to its customers whose information and funds were stolen as a result of the breach at 86 Michaels stores across the country. After two years of litigation, District Judge Thomas M. Durkin approved a nationwide settlement that requires Michaels to create a monetary fund from which class members could receive full reimbursement for monetary losses arising from the data breach. Also, every settlement class member was entitled to credit monitoring services for early detection of identity theft and credit fraud. As part of the settlement Michaels also verified that it had implemented strict new security measures to protect its customers from similar data breaches in the future.

- *Cox et al. v. Clarus Marketing Group, LLC et al.* (Southern District of California) – Mr. Marchese actively litigated claims for a nationwide class of online shoppers who made purchases on Provide-Commerce websites and who were deceptively enrolled in an online service, Freeshipping.com, for which they were charged unauthorized membership fees. The plaintiffs alleged that they were secretly enrolled in a "Freeshipping" rewards program using the aggressive Internet marketing practice known as "data pass," where Provide-Commerce engaged in the unauthorized sharing and charging of customers' billing information with a third-party vendor. After more than two years of litigation, District Judge Marilyn L. Huff approved a nationwide settlement valued at over $2.65 million, which included monetary reimbursement to settlement class members for their unauthorized membership charges.

Selected Published Decisions

- *In re Michaels Stores Pin Pad Litig.*, 830 F. Supp. 2d 518 (N.D. Ill. 2011) (denying motion to dismiss in data breach consumer class action)

- *Rossi v. The Procter & Gamble Co.*, No. 11-cv-7238, 2013 WL 5523098 (D.N.J. Oct. 3, 2013) (denying motion to dismiss in false advertising consumer class action against maker of Crest toothpaste)

- *Ebin v. Kangadis Food Inc.*, 297 F.R.D. 561 (S.D.N.Y. 2014) (certifying nationwide class of purchasers of purported "100% Pure Olive Oil" in false advertising consumer class action against edible oil distributor)

- *In re Scotts EZ Seed Litig.*, 304 F.R.D. 397 (S.D.N.Y. 2015) (certifying New York and California classes in false advertising case against grass seed manufacturer)

- *Weisblum, et al. v. ProPhase Labs, Inc., et al.*, No. 14-cv-3587. --- F. Supp. 3d ---, 2015 WL 738112 (S.D.N.Y. Feb. 20, 2015) (denying motion to dismiss in false advertising consumer class action against manufacturer of homeopathic cold medicine)

JOSHUA D. ARISOHN

Joshua D. Arisohn is a partner with Bursor & Fisher, P.A. Mr. Arisohn focuses his practice on complex business litigation, consumer class actions, and terrorism-related matters. Prior to joining Bursor & Fisher, Mr. Arisohn was an associate at Dewey & LeBoeuf LLP and DLA Piper LLP where he litigated precedent-setting cases in the areas of mass torts, terrorism and commercial disputes. He participated in the first ever trial to take place under the Anti-Terrorism Act, a statute that affords U.S. citizens the right to assert federal claims for injuries arising out of acts of international terrorism.

Mr. Arisohn is admitted to the State Bar of New York and is a member of the bars of the United States District Courts for the Southern District of New York and the Eastern District of New York.

Mr. Arisohn received his Juris Doctor from Columbia University School of Law in 2006, where he was a Harlan Fiske Stone Scholar. In 2002, Mr. Arisohn received his B.A. from Cornell University.

NEAL J. DECKANT

Neal J. Deckant is an Associate with Bursor & Fisher, P.A. Mr. Deckant focuses his practice on complex business litigation and consumer class actions. Prior to joining Bursor & Fisher, Mr. Deckant counseled low-income homeowners facing foreclosure in East Boston.

Mr. Deckant is admitted to the State Bar of New York and is a member of the bars of the United States District Courts for the Southern District of New York and the Eastern District of New York.

Mr. Deckant received his Juris Doctor from Boston University School of Law in 2011, graduating *cum laude* with two Dean's Awards. During law school, Mr. Deckant served as a Senior Articles Editor for the Review of Banking and Financial Law, where he authored two published articles about securitization reforms. In 2007, Mr. Deckant graduated with Honors from Brown University with a B.A. in East Asian Studies and Philosophy.

YITZCHAK KOPEL

Yitzchak Kopel is an Associate with Bursor & Fisher, P.A. Mr. Kopel focuses his practice on complex business litigation and consumer class actions.

Mr. Kopel is admitted to the State Bars of New York and New Jersey and is a member of the bars of the United States District Courts for the Southern District of New York, Eastern District of New York, and District of New Jersey.

Mr. Kopel received his Juris Doctor from Brooklyn Law School in 2012, graduating *cum laude* with two Dean's Awards. During law school, Mr. Kopel served as an Articles Editor for the Brooklyn Law Review and worked as a Law Clerk at Shearman & Sterling. In 2009, Mr. Kopel graduated *cum laude* from Queens College with a B.A. in Accounting.

ANNICK M. PERSINGER

Annick M. Persinger is an Associate with Bursor & Fisher, P.A. Ms. Persinger focuses her practice on complex business litigation and consumer class actions. Prior to joining Bursor & Fisher, Ms. Persinger worked as a legal research attorney for Judge John E. Munter in Complex Litigation at the San Francisco Superior Court.

Ms. Persinger is admitted to the State Bar of California and the bars of the United States District Courts for the Northern District of California, Central District of California, Southern District of California, and Eastern District of California.

Ms. Persinger received her Juris Doctor from University of California, Hastings College of the Law in 2010, graduating *magna cum laude*. During law school, Ms. Persinger served as a member of Hastings Women's Law Journal, and authored two published articles. In 2008, Ms. Persinger received an award for Best Oral Argument in the first year moot court competition. In 2007, Ms. Persinger graduated *cum laude* from University of California, San Diego with a B.A. in Sociology, and minors in Law & Society and Psychology.

FREDERICK J. KLORCZYK III

Frederick J. Klorczyk III is an Associate with Bursor & Fisher, P.A. Mr. Klorczyk focuses his practice on complex business litigation and consumer class actions.

Mr. Klorczyk is admitted to the State Bars of New York and New Jersey and is a member of the bars of the United States District Courts for the Southern District of New York, Eastern

District of New York, and District of New Jersey, and the United States Court of Appeals for the Second Circuit.

Mr. Klorczyk received his Juris Doctor from Brooklyn Law School in 2013, graduating *magna cum laude* with two CALI Awards for the highest grade in his classes on criminal law and conflict of laws. During law school, Mr. Klorczyk served as an Associate Managing Editor for the Brooklyn Journal of Corporate, Financial and Commercial Law and as an intern to the Honorable Alison J. Nathan of the United States District Court for the Southern District of New York and the Honorable Janet Bond Arterton of the United States District Court for the District of Connecticut. In 2010, Mr. Klorczyk graduated from the University of Connecticut with a B.S. in Finance.

YEREMEY O. KRIVOSHEY

Yeremey O. Krivoshey is an Associate with Bursor & Fisher, P.A. Mr. Krivoshey focuses his practice on complex business litigation and consumer class actions.

Mr. Krivoshey is admitted to the State Bar of California and is a member of the bars of the United States District Courts for the Northern, Central, Southern and Eastern Districts of California.

Mr. Krivoshey received his Juris Doctor from New York University School of Law in 2013, where he was a Samuel A. Herzog Scholar. During law school, Mr. Krivoshey worked as a Law Clerk at Vladeck, Waldman, Elias & Engelhard, P.C. Mr. Krivoshey also interned at the United States Department of Justice and the American Civil Liberties Union. In 2010, Mr. Krivoshey graduated *cum laude* from Vanderbilt University.

JULIA A. LUSTER

Julia A. Luster is an Associate with Bursor & Fisher, P.A.

Ms. Luster is admitted to the State Bar of California and is a member of the bars of the United States District Courts for the Northern, Central, Southern, and Eastern Districts of California. She is also admitted to the United States Court of Appeals for the Ninth Circuit.

In 2013, Ms. Luster received her Juris Doctor from UC Davis School of Law. While attending UC Davis, Ms. Luster externed with the Honorable Judge Arthur L. Alarcón of the United States Court of Appeals for the Ninth Circuit. She was a Senior Articles Editor for the UC Davis Law Review and a top 10 oral advocate in appellate advocacy. She also participated in the Moot Court interschool competition team. Ms. Luster worked at both the UC Davis Prison Law Clinic and UC Davis Civil Rights Clinic. While at the Civil Rights Clinic, she co-authored a Ninth Circuit brief for an appeal she subsequently argued and won. Prior to law school, Ms. Luster received her B.A. in English from UCLA and her M.A. in English and Comparative Literature from Columbia University.

PHILIP L. FRAIETTA

Philip L. Fraietta is an Associate with Bursor & Fisher, P.A. Mr. Fraietta focuses his practice on complex business litigation, consumer class actions, and employment law disputes.

Mr. Fraietta is admitted to the State Bars of New York and New Jersey, the bars of the United States District Courts for the Southern District of New York, Eastern District of New York, the District of New Jersey, and the United States Court of Appeals for the Second Circuit. Mr. Fraietta was a Summer Associate with Bursor & Fisher prior to joining the firm.

Mr. Fraietta received his Juris Doctor from Fordham University School of Law in 2014, graduating *cum laude*. During law school, Mr. Fraietta served as an Articles & Notes Editor for the Fordham Law Review, and published two articles. In addition, Mr. Fraietta received the Addison M. Metcalf Labor Law Prize for the highest grade in his graduating class in the Labor Law course, and received the highest grade in his Anti-Discrimination Law & Policy course. In 2011, Mr. Fraietta graduated *cum laude* from Fordham University with a B.A. in Economics.

EXHIBIT B

BURSOR & FISHER, P.A. -- RODRIGUEZ V. CITIMORTGAGE, INC. BILLING DIARIES THROUGH 9/2/2015						
DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2011.04.12	CitiMortgage	JIM	Conduct presuit investigation of military members' claims under the Servicemembers Civil Relief Act	2.7	$680	$1,836
2011.04.13	CitiMortgage	JIM	Conduct presuit investigation of military members' claims under the Servicemembers Civil Relief Act	1.4	$680	$952
2011.04.15	CitiMortgage	JIM	Correspondence w/ military service class members in connection with presuit investigation of SCRA violations	0.7	$680	$476
2011.04.18	CitiMortgage	JIM	Correspondence w/ class members in connection with presuit investigation concerning the Servicemembers Civil Relief Act	1.5	$680	$1,020
2011.04.19	CitiMortgage	JIM	Correspondence w/ servicemembers in connection with presuit investigation of SCRA foreclosure violations	0.9	$680	$612
2011.04.20	CitiMortgage	JIM	Correspondence w/ servicemembers in connection with presuit investigation of SCRA violations	3.2	$680	$2,176
2011.04.21	CitiMortgage	JIM	Correspondence w/ servicemembers regarding presuit investigation of potential SCRA violations	0.1	$680	$68
2011.04.25	CitiMortgage	JIM	Correspondence w/ servicemembers regarding presuit investigation of potential SCRA violations	1.0	$680	$680
2011.04.26	CitiMortgage	JIM	Correspondence w/ servicemembers regarding presuit investigation of potential SCRA violations	1.3	$680	$884
2011.04.26	CitiMortgage	JIM	Conduct presuit investigation of military members' claims under the Servicemembers Civil Relief Act	0.9	$680	$612
2011.04.27	CitiMortgage	JIM	Continue presuit investigation of potential SCRA violations and correspond w/ servicemembers regarding same	2.5	$680	$1,700
2011.04.28	CitiMortgage	JIM	Continue presuit investigation of potential SCRA violations and correspond w/ class members regarding same	1.0	$680	$680
2011.04.29	CitiMortgage	JIM	Continue presuit investigation of potential SCRA violations and correspond w/ class members regarding same	0.8	$680	$544
2011.05.04	CitiMortgage	JIM	Correspond w/ servicemembers regarding presuit investigation of potential SCRA violations	0.5	$680	$340
2011.05.05	CitiMortgage	JIM	Continue presuit investigation of potential SCRA violations	0.7	$680	$476
2011.05.06	CitiMortgage	JIM	Correspond w/ servicemembers regarding presuit investigation of potential SCRA violations and legal research regarding same	1.0	$680	$680
2011.05.09	CitiMortgage	JIM	Correspond with servicemembers in connection with presuit investigation of SCRA foreclosure violations, including J. Rodriguez	1.5	$680	$1,020
2011.05.10	CitiMortgage	JIM	Correspondence w/ J. Rodriguez (.2); review backup documentation of J. Rodriguez and communicate findings regarding same (.7); conduct legal research on elements of SCRA and confer w/ J. Wells regarding findings (.7)	1.6	$680	$1,088
2011.05.16	CitiMortgage	JIM	Continue presuit investigation of SCRA foreclosure violations	0.7	$680	$476
2011.05.17	CitiMortgage	JIM	Continue presuit investigation of SCRA foreclosure violations	0.5	$680	$340
2011.05.20	CitiMortgage	JIM	Continue presuit investigation of potential SCRA foreclosure violations and conduct research regarding same	3.1	$680	$2,108
2011.06.02	CitiMortgage	JIM	Conduct presuit investigation of SCRA foreclosure violations	0.3	$680	$204
2011.06.08	CitiMortgage	JIM	Correspond w/ S. Goldin to assist w/ drafting Rodriguez SCRA complaint	0.5	$680	$340
2011.06.24	CitiMortgage	JIM	Conduct presuit investigation of SCRA foreclosure violations	1.0	$680	$680
2011.06.27	CitiMortgage	JIM	Review and revise draft Rodriguez military complaint and confer w/ plaintiff and co-counsel regarding same	1.9	$680	$1,292
2011.06.28	CitiMortgage	JIM	Conduct SCRA research (.6); telephone call w/ co-counsel, R. Gray (.5); telephone w/ J. Rodriguez (.4); revise draft complaint (2.4)	3.9	$680	$2,652
2011.06.29	CitiMortgage	JIM	Telephone call w/ co-counsel, R. Gray, about draft complaint (.5); revise draft complaint (3.2)	3.7	$680	$2,516
2011.06.29	CitiMortgage	SAB	Conf. w/ J. Marchese re presuit investigation and drafting of complaint	0.8	$850	$680
2011.06.30	CitiMortgage	JIM	Conduct SOL and claims research for complaint (1.2); confer w/ R. Gray and SAB about complaint (.5); draft complaint (3.9); review S.D.N.Y. civil local rules for filing purposes (.3)	5.9	$680	$4,012
2011.07.01	CitiMortgage	JIM	Conduct research for complaint (1.7); telephone calls w/ J. Rodriguez about complaint (.3); draft email of additional plaintiffs' facts to be included in complaint (.3); followed up w/ additional interested servicemember (.4)	2.7	$680	$1,836
2011.07.01	CitiMortgage	SAB	Reviewed redlined draft complaint (1.4); teleconf w/ J. Wells and J. Marchese re same (.5); conf. w/ J. Marchese re same (.5); conf. w/ J. Marchese & N. Faruqi re draft complaint and terms of agreement with Carson Lynch (1.4); corresp re same (.5)	4.3	$850	$3,655
2011.07.05	CitiMortgage	JIM	Review revised complaint from SAB	0.2	$680	$136
2011.07.05	CitiMortgage	SAB	Revised draft complaint (3.5); corresp w/ co-counsel re same (.2)	3.7	$850	$3,145
2011.07.06	CitiMortgage	JIM	Conduct research for complaint (3.6); teleconf. w/ co-counsel about complaint and case strategy (1.5); telephone call w/ J. Rodriguez and revise complaint concerning same (.7); review SCRA online verification database (.4)	6.2	$680	$4,216
2011.07.06	CitiMortgage	SAB	Revised draft complaint (1.7); conf. call w/ J. Wells and G. Lynch and J. Marchese re revisions to complaint (.8); conf. w/ N. Faruqi re same (.3)	2.8	$850	$2,380

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DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2011.07.07	CitiMortgage	JIM	Conference call w/ co-counsel regarding case strategy (1.7); telephone call w/ J. Rodriguez about revisions to draft complaint (.4)	2.1	$680	$1,428
2011.07.07	CitiMortgage	SAB	Multiple teleconfs. And confs. w/ co-counsel to finalize complaint (1.5); confs. w/ J. Marchese re same (.5)	2.0	$850	$1,700
2011.07.08	CitiMortgage	JIM	Revise and finalize complaint (2.5); file complaint at S.D.N.Y. (1.5); update J. Rodriguez about filing and discuss next steps w/ SAB (1.2)	5.2	$680	$3,536
2011.07.08	CitiMortgage	SAB	Multiple confs. w/ J. Marchese re finalizing CitiMortgage complaint	0.9	$850	$765
2011.07.11	CitiMortgage	SAB	Conf. w/ J. Wells and N. Faruqi re status of case (.3); teleconf. w/ staff members re service of complaint (.2)	0.5	$850	$425
2011.07.15	CitiMortgage	SAB	Reviewed draft pro hac vice papers for philly lawyers	0.3	$850	$255
2011.07.18	CitiMortgage	JIM	Telephone call and correspondence w/ J. Rodriguez (.2); telephone call w/ [CLASS MEMBER NAME REDACTED], and save retainer agreement for same (.8)	1.0	$680	$680
2011.07.22	CitiMortgage	JIM	Attention to finalizing pro hac vice papers for Faruqi co-counsel (.2); telephone calls w/ defense counsel, L. Nale, regarding request for extension and upcoming 23(g) motion (.3); draft email to plaintiff's counsel regarding same and discuss case strategy w/ SAB (.4)	0.9	$680	$612
2011.07.25	CitiMortgage	JIM	Draft 23g motion (4.8); telephone call w/ defense counsel regarding defendant's request for extension (.2)	5.0	$680	$3,400
2011.07.26	CitiMortgage	JIM	Draft 23g motion (1.0); telephone call w/ defense counsel regarding extension request and plaintiff's upcoming 23g motion (.3); correspond w/ co-counsel regarding case strategy (.3); review defendant's draft stipulation for extension and proposed response to 23g motion (.3)	1.9	$680	$1,292
2011.07.27	CitiMortgage	JIM	Finalize stipulation for extension (.2); draft 23g motion (1.8)	2.0	$680	$1,360
2011.07.28	CitiMortgage	JIM	Revise 23g motion papers and confer w/ defense counsel regarding filing of same	2.9	$680	$1,972
2011.07.29	CitiMortgage	JIM	Circulate stipulation extending time to co-counsel (.1); coordinate w/ defense counsel regarding 23g filing (.2); revise 23g motion (.4)	0.7	$680	$476
2011.07.29	CitiMortgage	SAB	Reviewed draft 23g motion	0.7	$850	$595
2011.08.01	CitiMortgage	JIM	Finalize and file 23g motion (2.0); file new docket entries (.2)	2.2	$680	$1,496
2011.08.12	CitiMortgage	JIM	Review [CLASS MEMBER NAME REDACTED] documents (.5); telephone call w/ [CLASS MEMBER NAME REDACTED] to discuss her documents (.6)	1.1	$680	$748
2011.08.15	CitiMortgage	JIM	Telephone call w/ [CLASS MEMBER NAME REDACTED]	0.8	$680	$544
2011.08.30	CitiMortgage	JIM	Telephone call to defense counsel to discuss status of internal investigation of CitiMortgage	0.1	$680	$68
2011.09.01	CitiMortgage	JIM	Telephone call w/ defense counsel regarding ongoing internal investigation of defendant's foreclosure process as it pertains to the SCRA	0.2	$680	$136
2011.09.27	CitiMortgage	JIM	Review dates for Rule 16 conference and Rule 26 initial disclosures and note same on case status chart	0.2	$680	$136
2011.09.30	CitiMortgage	NJD	Wrote a letter to Judge Gardephe regarding filed 23(g) motion	1.0	$375	$375
2011.09.30	CitiMortgage	JIM	Review case calendar and J. Gardephe's individual practices regarding timetable for deciding motions and discuss same w/ NJD (.4); review defendant's answer (.9)	1.3	$680	$884
2011.10.03	CitiMortgage	JIM	Confer w/ SAB regarding D's answer (.2); review and save new docket entries (.2); telephone call to defense counsel regarding their internal investigation of D (.1); telephone call to J. Rodriguez about case status update (.3); revise, finalize and submit letter to chambers regarding pending 23g motion (1.0)	1.8	$680	$1,224
2011.10.10	CitiMortgage	JIM	Confer w/ SAB about case strategy and send email to defense counsel to schedule conference call about internal investigation of defendant's foreclosure practices	0.4	$680	$272
2011.10.14	CitiMortgage	JIM	Discuss case strategy w/ SAB and review and respond to correspondence from defense counsel	0.3	$680	$204
2011.10.20	CitiMortgage	JIM	Review and save docket entry (.1); review rules and J. Gardephe's individual practices about status conferences (.2); calendar initial status conference (.1); draft update email to J. Rodriguez (.1); correspond w/ defense counsel to schedule a teleconference for tomorrow (.1)	0.6	$680	$408
2011.10.21	CitiMortgage	JIM	Prepare for call w/ defense counsel and participate in call w/ L. Nale about Citi internal investigation and Rule 16 status conference (1.5); telephone call w/ J. Wells about upcoming conferences (.2); correspond w/ defense counsel and co-counsel regarding scheduling of 26(f) conference (.5)	2.2	$680	$1,496
2011.10.22	CitiMortgage	JIM	Telephone call w/ SAB about rescheduling Rule 16 conference and scheduling of Rule 26(f) conference	0.1	$680	$68
2011.10.23	CitiMortgage	JIM	Correspondence w/ co-counsel about coordinating before Rule 26(f) conference	0.2	$680	$136
2011.10.24	CitiMortgage	JIM	Correspond w/ defense counsel about scheduling 26(f) conference (.2); telephone call w/ defense counsel about moving rule 16 conference (.2); telephone call w/ LTF about 26(f) conference (.2); review rule 26(f) and J. Gardephe's form of proposed case management plan and scheduling order (.8); review and comment on draft letter to court to reschedule rule 16 conference (.3); participate in teleconference of plaintiff's counsel in advance of rule 26(f) conference and draft list of discovery items (1.6)	3.3	$680	$2,244
2011.10.24	CitiMortgage	LTF	Video conference (x2) with Joe Marchese re: Rule 26 conference.	0.2	$680	$136

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DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2011.10.25	CitiMortgage	NJD	Attended 26(f) conference. Discussed case with JIM and AB (1.5)	1.5	$375	$563
2011.10.25	CitiMortgage	JIM	Participate in 26(f) conference (1.0); confer w/ co-counsel regarding preparation of 26(f) joint report and proposed case management plan and scheduling order (.2); discuss case strategy w/ LTF, NJD and co-counsel (.9)	2.1	$680	$1,428
2011.10.25	CitiMortgage	SAB	Read endorsed letter re scheduling of initial conference	0.2	$850	$170
2011.10.25	CitiMortgage	ABB	Attended 26f conference and confer with J. Marchese about next steps	0.9	$375	$338
2011.10.26	CitiMortgage	JIM	Conduct research about bifurcation of discovery (.4); review and comment on proposed case management plan and scheduling order and Rule 26 joint letter of the parties (2.0); discussed discovery strategy w/ SAB (.2)	2.6	$680	$1,768
2011.10.27	CitiMortgage	NJD	Reviewed 26(f) joint letter and schedule	0.3	$375	$94
2011.10.27	CitiMortgage	JIM	Finalize plaintiff's drafts of Rule 26 joint letter and proposed scheduling order and circulate to defense counsel	0.8	$680	$544
2011.10.27	CitiMortgage	SAB	Conf. w/ J. Marchese re joint letter to court (.2) reviewed joint letter to court (.2)	0.4	$850	$340
2011.10.27	CitiMortgage	ABB	Reviewed draft scheduling order and letter to court	0.5	$375	$188
2011.10.28	CitiMortgage	JIM	Attention to finalizing Rule 26(f) joint letter of the parties and proposed case management plan and scheduling order and faxing same to court and co-counsel	2.9	$680	$1,972
2011.10.28	CitiMortgage	SAB	Read draft joint case management plan (.3); confs. w/ J. Marchese re same (.3)	0.6	$850	$510
2011.10.29	CitiMortgage	JIM	Review rule 26(f) joint letter and calendar date for proposed settlement meeting	0.3	$680	$204
2011.11.04	CitiMortgage	JIM	Draft first set of document requests	4.0	$680	$2,720
2011.11.04	CitiMortgage	ABB	Review JIM's draft document request	0.3	$375	$113
2011.11.08	CitiMortgage	JIM	Correspondence w/ [CLASS MEMBER NAME REDACTED] providing case status update	0.2	$680	$136
2011.11.14	CitiMortgage	JIM	Review J. Gardephe's practices about initial case management conferences and correspond w/ defendse counsel regarding courtesy copies of pleadings (.4); review order granting 23g motion, discuss w/ NJD and Faruqi co-counsel, and circulate to all co-counsel (.7); correspondence w/ J. Rodriguez about same (.4)	1.5	$680	$1,020
2011.11.14	CitiMortgage	SAB	Revised draft document requests	1.5	$850	$1,275
2011.11.15	CitiMortgage	JIM	Review SAB's comments to complaint, discuss same w/ SAB and further revise complaint	3.7	$680	$2,516
2011.11.16	CitiMortgage	SAB	Analyzed lead counsel order (.3); prep for initial status conference (1.4)	1.7	$850	$1,445
2011.11.17	CitiMortgage	NJD	Initial status conference	2.3	$375	$844
2011.11.17	CitiMortgage	JIM	Review news about BOA SCRA settlement (.2); attend case management conference (3.1); e-mail J. Gardephe's model protective order to defense counsel (.2); review SAB's e-mail to all plaintiff's counsel about the case management conference and next steps (.2); telephonce call w/ plaintiff J. Rodriguez to update him about the court conference and next steps (.5)	4.2	$680	$2,856
2011.11.17	CitiMortgage	SAB	Research re DOJ settlements with Countrywide and Saxon (.8); corresp w/ co-counsel re same (.4); prep for initial status conference (1.3); attended initial status conference (1.4); draft email to co-counsel re same (.3)	4.2	$850	$3,570
2011.11.17	CitiMortgage	ABB	Review hearing notes w SAB, JIM, and Chris M.	0.8	$375	$300
2011.11.21	CitiMortgage	JIM	Telephone call to J. Rodriguez about meeting for discovery purposes	0.3	$680	$204
2011.11.22	CitiMortgage	JIM	Email co-counsel regarding draft document requests	0.2	$680	$136
2011.11.23	CitiMortgage	JIM	Review case management plan and scheduling order (.3); review and comment on discovery requests and letter from SAB to L. Nale (1.5)	1.8	$680	$1,224
2011.11.23	CitiMortgage	SAB	Drafted discovery requests (3.3); analyzed scheduling order (.5); conf. w/ J. Marchese re same (.5); corresp w/ J. Wells, G. Lynch et al re same (.2)	4.5	$850	$3,825
2011.11.28	CitiMortgage	SAB	Conf. w/ J. Marchese re initial disclosures (.2); corresp w/ co-counsel re edits to the proposed protective order (.6)	0.8	$850	$680
2011.11.29	CitiMortgage	JIM	Review and comment on defendant's protective order (1.1); draft initial disclosures (2.0)	3.1	$680	$2,108
2011.11.29	CitiMortgage	SAB	Revised draft protective order and corresp re same (.9); conf. w/ J. Marchese re same (.3)	1.2	$850	$1,020
2011.11.30	CitiMortgage	JIM	Draft rule 26(a) initial disclosures	2.4	$680	$1,632
2011.12.01	CitiMortgage	NJD	Read Rule 26(a) initial disclosures	0.3	$375	$94
2011.12.01	CitiMortgage	JIM	Finalize and serve plaintiff's Rule 26a initial disclosures	1.4	$680	$952
2011.12.01	CitiMortgage	SAB	Revised draft initial disclosures (.7); conf. w/ J. Marchese re same (.6)	1.3	$850	$1,105
2011.12.02	CitiMortgage	SAB	Corresp re draft protective order	0.3	$850	$255
2011.12.03	CitiMortgage	JIM	Review and circulate WSJ article about government lawsuit against Citi and other mortgage lenders for illegal foreclosure practices	0.3	$680	$204

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DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2011.12.05	CitiMortgage	NJD	Researched consumer privacy sections of Gramm-Leach-Blilely and opined on whether model protective order was overly broad	0.8	$375	$281
2011.12.05	CitiMortgage	JIM	Telephone call w/ defense counsel about language in draft protective order	0.5	$680	$340
2011.12.05	CitiMortgage	SAB	Corresp re draft protective order (.2); conf. w. J. Marchese re same (.3)	0.5	$850	$425
2011.12.06	CitiMortgage	JIM	Review defendant's initial disclosures, RFPs and interrogatories and update case calendar regarding same (1.6); discuss draft protective order w/ co-counsel (.5)	2.1	$680	$1,428
2011.12.07	CitiMortgage	NJD	Read CitiMortgage initial disclosures	0.3	$375	$94
2011.12.07	CitiMortgage	JIM	Draft email to defense counsel regarding discovery (.7); email J. Rodriguez about defendant's initial discovery requests (.3); prepare for telephone call w/ defense counsel (.5); telephone call w/ SAB and D. Bogo-Ernst about discovery matters (1.1); revise and circulate draft protective order (.4)	3.0	$680	$2,040
2011.12.07	CitiMortgage	SAB	Read CitiMortgage Rule 26 initial disclosures (.3); read my Nov 23 letter and discovery requests to Citi and analyzed next steps (.7); drafted email to Citi's counsel (.3); conf. w/ J. Marchese re same (.5); teleconf. w/ Debra Bogo-Ernst re protective order and discovery scheduling (.8); conf. w/ J. Marchese re same (.3)	2.9	$850	$2,465
2011.12.08	CitiMortgage	JIM	Email exchange w/ J. Rodriguez about discovery matters	0.2	$680	$136
2011.12.09	CitiMortgage	JIM	Email exchange with defense counsel about protective order and comment on same	0.4	$680	$272
2011.12.09	CitiMortgage	SAB	Conf. w/ J. Marchese re protective order (.2); corresp w/ Debra Bogo-Ernst et al re protective order (.2)	0.4	$850	$340
2011.12.12	CitiMortgage	JIM	Reviewed J. Gardephe's individual practices about protective orders and faxes to chambers (.1); conferred w/ defense counsel to finalize protective order and reviewed the proposed protective order that was submitted to chambers (.3); telephone call to co-counsel at Faruqi & Faruqi regarding same (.1); telephone call to J. Rodriguez regarding defendant's initial discovery requests (.3)	0.8	$680	$544
2011.12.14	CitiMortgage	JIM	Telephone call w/ J. Rodriguez to schedule meeting and review defendant's initial discovery requests (1.0); draft follow-up email to J. Rodriguez regarding same (.5)	1.5	$680	$1,020
2011.12.19	CitiMortgage	JIM	Coordinate with R. Aldous about upcoming meeting with J. Rodriguez in New York City	0.3	$680	$204
2011.12.19	CitiMortgage	RIA	Confer with J. Marchese about upcoming Rodriguez meeting and prepare for same	0.8	$180	$144
2011.12.20	CitiMortgage	SAB	Conf. w/ J. Marchese re prep for meeting with Jorge Rodriguez	0.3	$850	$255
2011.12.20	CitiMortgage	RIA	Prepared for client meeting and forwarded logistics info and agenda to Jorge Rodriguez	2.0	$180	$360
2011.12.21	CitiMortgage	JIM	Review email from [CLASS MEMBER NAME REDACTED] regarding proposal received from CitiMortgage and discuss w/ SAB	0.9	$680	$612
2011.12.22	CitiMortgage	JIM	Telephone call to J. Rodriguez about meeting for discovery purposes (.7); telephone call and email to [CLASS MEMBER NAME REDACTED] regarding correspondence from Citimortgage (.2)	0.9	$680	$612
2011.12.22	CitiMortgage	SAB	Conf. w/ J. Marchese re upcoming meeting with Jorge Rodriguez	0.4	$850	$340
2011.12.23	CitiMortgage	SAB	Analyzed Citi's discovery responses and drafted letter to D. Bogo-Ernst re deficiencies	2.7	$850	$2,295
2011.12.27	CitiMortgage	JIM	Review emails and correspondence regarding defendant's responses and objections to plaintiff's initial discovery requests (.4); review defendant's discovery responses and objections (.6); telephone calls with [CLASS MEMBER NAME REDACTED] about December correspondence from attorneys for Arch Bay Holdings (1.5); review [CLASS MEMBER NAME REDACTED] backup documents (1.0); draft letter to attorneys for Arch Bay Holdings and discuss w/ [CLASS MEMBER NAME REDACTED] (1.0); meeting w/ J. Rodriguez to collect additional documents and discuss discovery and case strategy (3.0); review and comment on draft subpoenas and attachments thereto for non-parties (.7)	8.2	$680	$5,576
2011.12.27	CitiMortgage	SAB	Conf. w/ Jorge Rodriguez, Monica Rodriguez and J. Marchese re status of litigation and next steps (1.0); conf. w/ J. Marchese re next steps (.8); conf. w/ J. Marchese and A. Bundlie re subpoenas to Latreese Ellis and Barret Burke (.5); conf. w/ J. Marchese re the [CLASS MEMBER NAME REDACTED] (.3); reviewed draft letter re possible [CLASS MEMBER NAME REDACTED] foreclosure action (.2)	2.8	$850	$2,380
2011.12.27	CitiMortgage	ABB	Conf w/ J. Rodriguez re status of litigation and next steps (1.5), review Def's reply to doc request and interrog request, research for and draft subpoenas for Barrett Burke and Latreese Ellis (3.2)	4.7	$375	$1,763
2011.12.28	CitiMortgage	JIM	Respond to defendant's discovery requests (1.0); draft email to and make telephone call to counsel for Arch Bay Holdings (.4); telephone call and email to [CLASS MEMBER NAME REDACTED] (.2); comment on, finalize and serve non-party subpoenas (2.0)	3.6	$680	$2,448
2011.12.28	CitiMortgage	SAB	Conf. w/ J. Marchese & A. Bundlie to revise draft subpoenas to Latreese Ellis and Barrett Burke firm	0.8	$850	$680
2011.12.28	CitiMortgage	ABB	Finish drafting subpoenas for Barrett Burke and Latreese Ellis, submit same to process server, draft notice of subpoena for ECF filing, discuss case strategy w JIM and SAB, review Def's first request for docs, arrange for depo in Dallas w Merrill Corp., scan and post client's personal docs to Box	5.2	$375	$1,950
2011.12.28	CitiMortgage	RIA	Drafted discovery responses	2.8	$180	$504

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DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2011.12.28	CitiMortgage	RIA	Arranged service of subpoenas	0.5	$180	$90
2011.12.29	CitiMortgage	JIM	Revised Ellis subpoena for service (.3); review Rodriguez documents for production and discussed same w/ ABB and SAB (.7); review and comment on initial draft of privilege log (.2); attention to responding to defendant's discovery requests (1.9)	3.1	$680	$2,108
2011.12.29	CitiMortgage	SAB	Conf. w/ J. Marchese and A. Bundlie re review of Jorge Rodriguez's documents	0.7	$850	$595
2011.12.29	CitiMortgage	ABB	Work on privilege log, review J. Rodriguez's docs, discuss priv w JIM	2.9	$375	$1,088
2011.12.29	CitiMortgage	ABB	Schedule and calendar depositions for Latreese Ellis and Barrett Burke in Dallas	0.7	$375	$263
2011.12.29	CitiMortgage	RIA	Follow up on subpoenas	0.5	$180	$90
2011.12.30	CitiMortgage	JIM	Telephone calls and emails to [CLASS MEMBER NAME REDACTED], interested class member in the Air Force (.8); telephone call to A. Bundlie about responding to defendant's discovery requests (.2)	1.0	$680	$680
2011.12.30	CitiMortgage	SAB	Teleconf. w/ Latreese Ellis re deposition subpoena, confirmed availability on Feb 2	0.2	$850	$170
2011.12.30	CitiMortgage	ABB	Discuss D's RFPs w JIM, begin drafting response	2.3	$375	$863
2011.12.30	CitiMortgage	RIA	Sent retainer and organized case file	0.5	$180	$90
2011.12.30	CitiMortgage	RIA	Scanned documents for discovery	0.3	$180	$54
2012.01.03	CitiMortgage	NJD	Confer w/ SAB and JIM re determination of "active duty" status and RFP revisions	1.5	$375	$563
2012.01.03	CitiMortgage	JIM	Participate in conference call with defense counsel regarding discovery issues (.7); review documents from J. Rodriguez in connection with responding to defendant's discovery requests (2.5); revise, finalize and serve plaintiff's responses to defendant's first set of interrogatories and first request for production of documents (5.4)	8.6	$680	$5,848
2012.01.03	CitiMortgage	SAB	Prep for meet and confer to discuss discovery disputes (1.0); conf. call w/ D. Bogo-Ernst et al to meet and confer re discovery disputes (.8); drafted joint letter to Judge Gardephe re discovery disputes (4.0); revised draft responses to Citi's document requests and interrogatories (3.9)	9.7	$850	$8,245
2012.01.03	CitiMortgage	ABB	Finalize Rodriguez doc scans and bates-label same	0.5	$375	$188
2012.01.03	CitiMortgage	ABB	Finalize response to Def's First Set of Interrogs, review response to First Discovery Request w JIM, review edits to doc our doc request response	4.1	$375	$1,538
2012.01.03	CitiMortgage	ABB	Discuss production doc chron w JIM	0.3	$375	$113
2012.01.04	CitiMortgage	JIM	Attention to drafting chronology (.1); review correspondence from defense counsel about protective order (.1)	0.2	$680	$136
2012.01.04	CitiMortgage	SAB	Corresp & conf. w/ J. Marchese re preparation of a chronology (.3); teleconf. w/ D. Bogo-Ernst and court clerk re Judge's requested change to protective order (.2)	0.5	$850	$425
2012.01.04	CitiMortgage	ABB	Discussed Rodriguez chron w JIM	0.3	$375	$113
2012.01.05	CitiMortgage	JIM	Review correspondence from defense counsel regarding progress on joint letter to chambers concerning discovery disputes	0.1	$680	$68
2012.01.06	CitiMortgage	JIM	Review email from defense counsel about joint letter concerning discovery dispute	0.1	$680	$68
2012.01.09	CitiMortgage	JIM	Review email and correspondence from interested borrower [CLASS MEMBER NAME REDACTED] and telephone call with same (.8); review government consent order against Citi along with related interagency review, PWC engagement letter and interim status report and discuss same with SAB (3.0); draft case chronology (3.4)	7.2	$680	$4,896
2012.01.09	CitiMortgage	SAB	Revised draft joint letter re discovery dispute (3.5); conf. w/ J. Marchese re same (.3)	3.8	$850	$3,230
2012.01.10	CitiMortgage	JIM	Review revised draft of joint letter related to discovery issues (.7); attend all-lawyers teleconference regarding same (.8); review S.D.N.Y. cases about pre-certification discovery (.5); discuss case strategy w/ SAB (.2); telephone call with interested borrower [CLASS MEMBER NAME REDACTED] (.2)	2.4	$680	$1,632
2012.01.10	CitiMortgage	SAB	Prep for conf. call w/ D. Bogo-Ernst re joint letter re discovery dispute (1.0); attended conf. call (.6); revised draft joint letter (1.3)	2.9	$850	$2,465
2012.01.10	CitiMortgage	ABB	Researched caselaw re: pre-cert discovery of putative class member ID info, circulated findings re same, attend call w opposing counsel, reviewed draft of joint letter to chamber re discovery	2.1	$375	$788
2012.01.11	CitiMortgage	JIM	Review e-mails relating to joint letter about discovery dispute	0.2	$680	$136
2012.01.11	CitiMortgage	SAB	Corresp w/ D. Bogo-Ernst re joint letter	0.2	$850	$170
2012.01.12	CitiMortgage	JIM	Review revised joint letter from defense counsel and e-mails regarding same (.3); review protective order entered by judge and save same to file (.1); review Barrett Daffin's objections to subpoena (.3)	0.7	$680	$476
2012.01.12	CitiMortgage	SAB	Finalized joint letter and corresp re same	0.9	$850	$765
2012.01.12	CitiMortgage	ABB	Researched Barrett Daffin, circulated findings; Reviewed correspondence re CTI letter between SAB and opposing counsel; reviewed protective order	1.2	$375	$450

BURSOR & FISHER, P.A. -- RODRIGUEZ V. CITIMORTGAGE, INC. BILLING DIARIES THROUGH 9/2/2015						
DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2012.01.13	CitiMortgage	JIM	Conduct research concerning Barrett Burke and have call w/ co-counsel about motion to compel in connection with subpoena served on Barrett Burke	1.0	$680	$680
2012.01.13	CitiMortgage	SAB	Teleconf. w/ J. Wells, G. Lynch, J. Marchese re Barret Burke objections to subpoena	0.4	$850	$340
2012.01.13	CitiMortgage	ABB	Discussed Barrett Burke findings w JIM for use in motion to compel, circulated news articles re Barrett; reviewed Citi's objections.	2.6	$375	$975
2012.01.13	CitiMortgage	RIA	Sent joint discovery letter to judge	0.3	$180	$54
2012.01.13	CitiMortgage	RIA	Scanned subpoena proof of service	0.2	$180	$36
2012.01.16	CitiMortgage	JIM	Confer w/ SAB and ABB about finalizing document production (.6); review final privilege log and cover letter to defense counsel (.2); telephone call w/ [CLASS MEMBER NAME REDACTED] regarding status of military orders (.1)	0.9	$680	$612
2012.01.16	CitiMortgage	SAB	Conf. w/ J. Marchese and A. Bundlie re review of Jorge Rodriguez's documents (.8); drafted cover letter re document production (.5); revised draft privilege log (.2); reviewed protective order (.3); read intra-agency review materials (1.1)	2.9	$850	$2,465
2012.01.16	CitiMortgage	ABB	Finalized document production, revised privilege log, reviewed same w SAB and JIM, reviewed associated cover letter	2.6	$375	$975
2012.01.17	CitiMortgage	JIM	Review correspondence from attorneys for Barrett Daffin and draft e-mail to co-counsel at Faruqi concerning motion to compel	0.5	$680	$340
2012.01.18	CitiMortgage	NJD	Converted a bizarre file extension to PDF, in connection with document review	0.3	$375	$94
2012.01.18	CitiMortgage	JIM	Review emails and correspondence from [CLASS MEMBER NAME REDACTED] and analyze and save her military orders to the case file (1.7); review and respond to emails from co-counsel about motion to compel in connection with Barrett Burke subpoena (.3)	2.0	$680	$1,360
2012.01.18	CitiMortgage	SAB	Analyzed Holmes and Bowen cases re definition of "military service" for members of the National Guard	1.0	$850	$850
2012.01.19	CitiMortgage	SAB	Prep for Latreese Ellis deposition	0.5	$850	$425
2012.01.19	CitiMortgage	RIA	Booked Scott's flight to Citimortgage depositions and assisted with deposition preparation	1.8	$180	$324
2012.01.20	CitiMortgage	JIM	Review e-mails regarding counsel for L. Ellis and Barrett Burke (.2); review e-mail from defense counsel about proposed production protocal and meet with document production vendor regarding same (1.5); review and respond to e-mails from [CLASS MEMBER NAME REDACTED] and review attached backup documents (.5); draft e-mail regarding production of plaintiff's documents in proposed format to vendor (.2)	2.4	$680	$1,632
2012.01.20	CitiMortgage	SAB	Analyzed Citi's proposed production format (.5); teleconf. w/ A. Kass re setting up Relativity online document database (.2); conf. w/ J. Marchese and A. Kass re setting up relativity database for document production (.9)	1.6	$850	$1,360
2012.01.23	CitiMortgage	JIM	E-mail exchanges w/ document production vendor regarding formatting of plaintiff's documents for re-production and about Relativity document review platform (.4); attend all-plaintiff's counsel teleconference about non-party subpoenas (.3); review e-mails regarding deposition of L. Ellis (.2); review formatted documents from vendor and re-produce same to defense counsel with cover letter and e-mail regarding same (1.2)	2.1	$680	$1,428
2012.01.23	CitiMortgage	SAB	Conf. w/ J. Marchese re document production logistics (.2); conf. call w/ G. Lynch, J. Wells, and J. Marchese re Barrett Burke and Latreese Ellis subpoenas (.3); document review and corresp re same (1.5)	2.0	$850	$1,700
2012.01.23	CitiMortgage	ABB	Discussed production issues w SAB	0.1	$375	$38
2012.01.24	CitiMortgage	NJD	Attended presentation on CitiMortgage document review, and next steps	0.8	$375	$281
2012.01.24	CitiMortgage	JIM	Review e-mails and backup documents from [CLASS MEMBER NAME REDACTED] (.5); save signed retainer from new plaintiff, [CLASS MEMBER NAME REDACTED], and have e-mail exchange w/ same (.2); attend Relativity meeting in connection with upcoming document review and review follow-up e-mails regarding same (1.5)	2.2	$680	$1,496
2012.01.24	CitiMortgage	SAB	Conf. w/ US Legal Support re document review protocols	1.0	$850	$850
2012.01.24	CitiMortgage	ABB	Conf w/ U.S. Legal Support re production, review, and coding software	0.9	$375	$338
2012.01.26	CitiMortgage	JIM	Review e-mails regarding depositions of L. Ellis and Barrett Burke	0.2	$680	$136
2012.01.26	CitiMortgage	SAB	Corresp w/ counsel re scheduling 3d party discovery	0.3	$850	$255
2012.01.27	CitiMortgage	JIM	Review e-mails regarding scheduling of Barrett Burke deposition and confer w/ S. Bursor regarding same (.3); review e-mails and attached backup documents from [CLASS MEMBER NAME REDACTED] (.3); confer w/ S. Bursor about document review and review e-mails about same (.4)	1.0	$680	$680
2012.01.27	CitiMortgage	SAB	Document review (1.5); corresp w/ G. Lynch re 3d party discovery (.4); teleconf. w/ G. Lynch re same (.3)	2.2	$850	$1,870

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DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2012.01.30	CitiMortgage	JIM	Review e-mails from counsel for Barrett Burke and L. Ellis and participate in all-hands telephone call about subpoenas to same	1.0	$680	$680
2012.01.30	CitiMortgage	SAB	Corresp w/ C. Curran et al re 3d party subpoenas to Barret Burke and Latreese Ellis (.5); prep for meet and confer (.5); conf. call w/ C. Curran, D. Bogo-Ernst, G. Lynch, and J. Marchese re same (.5); drafted email re agreement on briefing schedule (.2); drafted email re document production protocol (.1)	1.8	$850	$1,530
2012.01.31	CitiMortgage	JIM	Calendar new dates for briefing schedule relating to motion to quash the BB and Ellis subpoenas (.1); review documents producted by Citi and take notes thereon (3.0)	3.1	$680	$2,108
2012.01.31	CitiMortgage	ABB	Helped JIM with online doc review	0.4	$375	$150
2012.02.01	CitiMortgage	NJD	Solved some issues w/ Relativity document review system	0.3	$375	$94
2012.02.01	CitiMortgage	JIM	Review documents produced by Citi and take notes thereon (4.9); conduct research regarding military status distinctions (.3); discuss hot documents and findings w/ SAB (.5); draft e-mail list of potential deponents (.5); draft deposition notices to A. Rinehart and K. Subleski (.5); find contact information for Texas real estate broker, Glen Goeloe, and make telephone call to same (.5); confer w/ SAB and ABB about strategy for opposing motion to quash subpoena to Barrett Burke and discuss review of BB legal bills w/ ABB (.4); revise case chronology (.7)	8.1	$680	$5,508
2012.02.01	CitiMortgage	SAB	Conf. w/ J. Marchese and A. Bundlie re hot docs (.5); document review and analysis of missing documents (.5); conf. w/ J. Marchese re discovery follow-up (.5);	1.5	$850	$1,275
2012.02.01	CitiMortgage	ABB	Doc review, research on military status delineations	1.5	$375	$563
2012.02.02	CitiMortgage	NJD	Scanned Pricewaterhousecoopers summons	0.3	$375	$94
2012.02.02	CitiMortgage	JIM	Confer w/ A. Bundlie about Barrett Burke's legal bills and services from Citi production (.5); confer w/ S. Bursor and A. Bundlie about subpoena to PWC and review e-mail about same (.2); review e-mails about Barrett Burke's and L. Ellis's counsel's motion to quash and review motion to quash and brief in support (.9); review draft letter to Citi's counsel about failure to produce documents corresponding to plaintiff's document requests and comment on same (.6)	2.2	$680	$1,496
2012.02.02	CitiMortgage	JIM	Discuss motion to quash subpoenas with S. Bursor and A. Bundlie (.3); e-mail exchange with U.S. Legal about Barrett Burke's document production (.5); schedule teleconference w/ G. Lynch (.1); review Barrett Burke document production and discuss findings with S. Bursor and A. Bundlie (1.3); review notice of subpoena to PWC (.1); teleconference w/ G. Lynch, S. Golden, S. Bursor and A. Bundlie about Barrett Burke document production and our opposition to the motion to quash (.8); review letter from Citi's counsel in response to our letter about discovery issues (.3)	3.4	$680	$2,312
2012.02.02	CitiMortgage	SAB	Drafted letter to D. Bogo-Ernst re discovery issues (2.0); drafted subpoena to PricewaterhousCoopers (.5); corresp re Barret Burke motion to quash (.4)	2.9	$850	$2,465
2012.02.02	CitiMortgage	ABB	Finished reviewing Citi doc production and pulled Barrett docs, drafted and served PWC subpoena, drafted notice of subpoena, redlined SAB's letter to Mayer Brown	4.6	$375	$1,725
2012.02.03	CitiMortgage	NJD	Uploaded documents to FTP server, corresponded w/ US Legal Support for them to load it into Relativity	0.5	$375	$188
2012.02.03	CitiMortgage	NJD	More correspondance w/ US Legal Support	0.3	$375	$94
2012.02.03	CitiMortgage	NJD	Discussed the state of discovery w/ SAB and JIM	0.5	$375	$188
2012.02.03	CitiMortgage	SAB	Read Barrett Burke motion to quash (.5); conf. w/ A. Bundlie and J. Marchese re review of Barret Burke documents and preparing response to motion to quash (.5); revised and served notice of subpoena (.2); reviewed Barret Burke document production (1.5); conf. call w/ G. Lynch, S. Goldin, A. Bundlie, J. Marchese (.4)	3.1	$850	$2,635
2012.02.03	CitiMortgage	ABB	Reviewed SAB's notice of PWC subpoena, discussed Barrett's production w JIM, reviewed key docs, reviewed Citi's Motion to Quash, sat in on call w Gary Lynch re next week's response, forwarded relevant material to Gary.	4.8	$375	$1,800
2012.02.06	CitiMortgage	JIM	Save letter from D. Bogo-Ernst to file	0.1	$680	$68
2012.02.06	CitiMortgage	ABB	Reviewed the Mayer Brown letter re production	0.4	$375	$150
2012.02.07	CitiMortgage	JIM	Attention to discovery issues	0.2	$680	$136
2012.02.07	CitiMortgage	SAB	Corresp re opposition to Barrett Daffin motion to quash (.4)	0.4	$850	$340
2012.02.07	CitiMortgage	ABB	Contacted Gary Lynch re opposition to motion to quash - no response.	0.2	$375	$75
2012.02.08	CitiMortgage	JIM	Review draft of opposition to motion to quash and comment on same (2.0); confer w/ A. Bundlie regarding same (.3)	2.3	$680	$1,564
2012.02.08	CitiMortgage	ABB	Reviewed draft Opp'n to Motion to Quash, researched, redlined, circulated	5.1	$375	$1,913

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DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2012.02.09	CitiMortgage	JIM	Telephone call with J. Rodriguez about case update (.3); revise opposition to motion to quash and confer w/ A. Bundlie regarding same (2.5); review e-mails regarding opposition to motion to quash (.2); review final opposition to motion to quash (.2); confer w/ S. Bursor about discovery strategy (.2); discuss defendant's latest document production with A. Bundlie (.5)	3.9	$680	$2,652
2012.02.09	CitiMortgage	ABB	Revised final draft of Opp'n to Motion to Quash, sent back to Faruqi, called Gary Lynch to discuss changes, discussed same w JIM, confirmed upload of most recent doc production	4.2	$375	$1,575
2012.02.10	CitiMortgage	JIM	Review Rowles settlement article and settlement papers and discuss w/ S. Bursor (1.0); review new document production from Citi and new document production from Barrett Daffin and discuss w/ A. Bundlie (3.7); revise case chronology (.5)	5.2	$680	$3,536
2012.02.10	CitiMortgage	SAB	Conf. w/ J. Marchese re Chase SCRA settlement	0.3	$850	$255
2012.02.10	CitiMortgage	ABB	Reviewed Citi's most recent doc production, discussed same w JIM, uploaded Barrett's most recent doc production to Relativity, reviewed same, foldered all production cover letters, researcher militaryonesource.com/scra	3.5	$375	$1,313
2012.02.11	CitiMortgage	JIM	Review defendant's privilege log (.2); review letter from L. Nale about OCC regulations relating to Pwc subpoena (.2)	0.4	$680	$272
2012.02.13	CitiMortgage	NJD	Assisted with CitiMortgage doc review	0.3	$375	$94
2012.02.13	CitiMortgage	JIM	Discuss L. Nale's letter about Pwc subpoena with A. Bundlie and review e-mail regarding same (.3); review defendant's supplementary document production, take notes thereon, and discuss findings with A. Bundlie and S. Bursor (3.8); review e-mail from and telephone call with Pwc's counsel about subpoena (.4)	4.5	$680	$3,060
2012.02.13	CitiMortgage	SAB	Analyzed Lucia Nale letter re PwC subpoena (1.3); conf. w/ A. Bundlie re same (.3); teleconf. w/ M. Mugmon re PwC subpoena (.3); doc review Citi 1810-2163 (1.5); teleconf. w/ D. Bogo Ernst re discovery issues (.2); conf. w/ J. Marchese & A. Bundlie re document review (.9)	4.5	$850	$3,825
2012.02.13	CitiMortgage	ABB	Research re SCRA resources and terminology, reviewed latest Citi document production, discussed same w JIM and SAB, sat in on brief call with Citi re scheduling depos and production schedule, reviewed, saved, and circulated final Opp'n to Motion to Quash, reviewed Citi letter re PwC subpoena, researched regs and caselaw, discussed same w JIM and SAB, sat in on call with Wilmer Hale, drafted OCC request for info	6.6	$375	$2,475
2012.02.14	CitiMortgage	JIM	Draft notes for 30(b)(6) deposition (1.0); review order concerning motion to quash and confer with S. Bursor and G. Lynch regarding same and about scheduling a meet and confer with counsel for Ellis and Barrett Burke (1.0); teleconference with Citi's counsel about document production issues and deposition scheduling, and e-mail exchange with defense counsel regarding same (1.1); review and comment on draft of expedited request letter to OCC concerning documents in Pwc's possession (.3); discuss case strategy with S. Bursor (.4); research addresses for new Citi employee deponents (.5)	4.3	$680	$2,924
2012.02.14	CitiMortgage	SAB	Analyzed order on Barret Daffin motion to quash (1.0); Conf. call w/ D. Bogo Ernst, L. Nale, J. Marchese, and A. Bundlie re discovery issues (1.1); conf. w/ A. Bundlie re OCC letter (.3)	2.4	$850	$2,040
2012.02.14	CitiMortgage	ABB	Drafted letter to OCC, attended call w DBE	2.3	$375	$863
2012.02.15	CitiMortgage	NJD	Discussed status of case w/ JIM and SAB	1.0	$375	$375
2012.02.15	CitiMortgage	JIM	Discuss 30(b)(6) deposition dates with S. Bursor (.1); review reply brief in support of motion to quash filed by counsel for Barrett Daffin and L. Ellis (.3); participate in telephone call with all plaintiff's counsel and counsel for Barrett Daffin and L. Ellis in connection with court order to meet and confer (1.2); review e-mails from co-counsel about deposition strategy (.2); review e-mail from defense counsel about deposition scheduling (.1); discuss case strategy with S. Bursor (.1); confer with Faruqi about research into the whereabouts of deponents Hill and Fauble (.2)	2.2	$680	$1,496
2012.02.15	CitiMortgage	SAB	Drafted email to D. Bogo-Ernst re deposition scheduling (.3); conf. w/ A. Bundlie re OCC letter (.3); conf. call w/ C. Curran et al to meet & confer on Barrett Daffin & Latreese Ellis subpoenas (1.0); teleconf. w/ J. Wells re same (.3); reviewed draft letter to OCC (.5)	2.4	$850	$2,040
2012.02.15	CitiMortgage	ABB	Edited letter to OCC, reviewed Barrett Daffin's Reply Brief, sat in on meet and confer	2.5	$375	$938
2012.02.16	CitiMortgage	JIM	Review Citi production for additional key documents and discuss findings with S. Bursor in connection with case chronology (1.3); review order of reference from J. Gardephe about discovery dispute and save to case file (.2); confer with S. Bursor about expedited request letter to OCC (.2); review e-mail to PwC counsel about limiting subpoena (.1); attend follow up meet and confer teleconference between plaintiff's counsel and counsel for L. Ellis and B. Daffin (.7)	2.5	$680	$1,700

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DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2012.02.16	CitiMortgage	SAB	Conf. call w/ C. Curran et al to meet & confer on Barrett Burke & Latreese Ellis subpoenas (.5); revised draft chronology (3.7); teleconf. w/ M. Mugnon re PwC subpoena (.4); analyzed information about the government's national mortgage settlement (2.4); conf. w/ N. Faruqi re litigation strategy (.6); conf. w/ J. Marchese & A. Vozzolo re government settlement (.4)	8.0	$850	$6,800
2012.02.16	CitiMortgage	ABB	Sat in on meet and confer, circulated DOJ settlement, reviewed doc production for title and note docs	1.6	$375	$600
2012.02.17	CitiMortgage	JIM	Discuss national mortgage settlement with co-counsel at Faruqi (.3); telephone calls with J. Freeman's chambers about scheduling call for discovery dispute and coordinate with all parties to schedule same for next week (1.3)	1.6	$680	$1,088
2012.02.20	CitiMortgage	JIM	Update case status sheet with new case developments (.2); confer with S. Bursor about intial draft of joint letter concerning Ellis and BD subpoenas and review and comment on same (1.6); review Ellis's and BD's draft sections of joint letter (.5); compile plaintiff's exhibits for joint appendix to joint letter and e-mail same to counsel for Ellis and BD (.9)	3.2	$680	$2,176
2012.02.20	CitiMortgage	SAB	Revised draft chronology (3.5); drafted sections of joint status report (5.0); conf. w/ J. Marchese re deposition prep (.8)	9.3	$850	$7,905
2012.02.20	CitiMortgage	ABB	Reviewed and redlined SAB's portion of joint status report letter	0.6	$375	$225
2012.02.21	CitiMortgage	JIM	Review e-mails about deposition schedule and locations (.2); review NYT and WSJ articles about proposed national mortgage settlement and discuss with S. Bursor (.5); attention to my travel arrangements for depositions on March 7-9 (.3); review draft of Citi's and Pwc's sections in joint letter to court about discovery dispute regarding Pwc subpoena and discuss w/ S. Bursor (.5); participate in all plaintiffs' counsel teleconference about joint status report to court concerning the motion to quash the Ellis and Barrett Daffin subpoenas (.5)	2.0	$680	$1,360
2012.02.21	CitiMortgage	SAB	Conf. call w/ J. Wells, G. Lynch, A. Bundlie and J. Marchese re preparation of joint status report re Barrett Daffin subpoenas (.5); conf. w/ J. Marchese re deposition scheduling (.2); drafted email to D. Bogo-Ernst re same (.1)	0.8	$850	$680
2012.02.21	CitiMortgage	ABB	Created Citi joint status letter exhibit list, sat in on conference call re same	1.5	$375	$563
2012.02.22	CitiMortgage	JIM	Review revised privilege log (.2); discuss joint status report and national mortgage settlement with J. Wells (.2)	0.4	$680	$272
2012.02.22	CitiMortgage	SAB	Corresp. w/ G. Lynch et al re preparation of joint status report (.2); reviewed proposed edits to joint status report (.3)	0.5	$850	$425
2012.02.22	CitiMortgage	ABB	Draft revised exhibit list, organize, redact, and merge documents for exhibit appendix	2.0	$375	$750
2012.02.22	CitiMortgage	RIA	Redacted privileged information from documents for discovery	1.0	$180	$180
2012.02.23	CitiMortgage	JIM	Review e-mail from Citi's counsel about location of 30(b)(6) deposition and other deponent details (.1); e-mail exchange with co-counsel and Ellis counsel about exhibits for joint appendix (.2); review e-mails about filing joint status report (.1); review draft of joint status report and appendix and discuss with A. Bundlie (.5); assist with finalizing same for filing (.5)	1.4	$680	$952
2012.02.23	CitiMortgage	SAB	Finalized joint status report	0.7	$850	$595
2012.02.23	CitiMortgage	ABB	Coordinated revised joint letter circulation, including revised and redacted Plaintiff's exhibits, and attached signatory pages	2.7	$375	$1,013
2012.02.24	CitiMortgage	JIM	Prepare for and participate in teleconference call with J. Freeman about discovery dispute (1.8); confer with A. Bundlie about making deposition notes in preparation for deposition of 30(b)(6) witness (.3); confer with A. Bundlie and S. Bursor about telephone call to Department of Defense (.3); confer with A. Bundlie about drafting letter to Citi's lawyers about outstanding document production issues (.3); review and revise letter to Citi's lawyers (.8)	3.5	$680	$2,380
2012.02.24	CitiMortgage	SAB	Prep for telephonic hearing w/ Magistrate Judge Debra Freedman re discovery dispute (.5); telephonic hearing (.8); conf. w/ J. Marchese and A. Bundlie re next steps on discovery (.5)	1.8	$850	$1,530
2012.02.24	CitiMortgage	ABB	Drafted SAB letter to DBE re outstanding discovery issues	1.5	$375	$563
2012.02.24	CitiMortgage	ABB	Reviewed executive summary of DoJ mortgage settlement	1.1	$375	$413
2012.02.27	CitiMortgage	JIM	Discuss Department of Defense contacts with R. Aldous (.2); review order of J. Kaplan about motion to quash hearing and calendar same (.2)	0.4	$680	$272

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2012.02.28	CitiMortgage	JIM	Confer with ABB and SAB about standard for ascertaining class members in the Second Circuit (.2); review e-mail exchanges regarding deposition scheduling (.3); confer with A. Bundlie about contacts at Department of Defense and call DOD to discuss assistance with determining active duty periods for foreclosed servicemembers (.5); confer with SAB about conclusions from call with DOD (.1); draft e-mail to internal team about certain document review findings (.2); update case calendar and management sheet with new developments (.1); telephone call with J. Rodriguez to confirm information relating to discovery (.2)	1.6	$680	$1,088
2012.02.28	CitiMortgage	SAB	Teleconf. w/ D. Bogo-Ernst re deposition scheduling & related issues (.7); drafted email re same (.4); conf. w/ J. Marchese re same (.4); research re legal standards for ascertainability of class members (2.3)	3.8	$850	$3,230
2012.02.28	CitiMortgage	ABB	Researched DoD contacts for 3rd party review, discussed same w SAB and JIM, legal research re 2d Cir. standard for class ascertainability, uploaded Citi's most recent document production to Relativity, scanned and posted associated cover letter, reviewed SAB's letter to DBE	2.9	$375	$1,088
2012.02.29	CitiMortgage	SAB	Conf. w/ R. Aldous re preparing deposition notices (.2); revised chronology (.2)	0.4	$850	$340
2012.02.29	CitiMortgage	ABB	Work with Relativity to ensure most recent doc production is properly uploaded	0.6	$375	$225
2012.02.29	CitiMortgage	RIA	Drafted deposition notices and scheduled place for deposition	1.2	$180	$216
2012.03.01	CitiMortgage	ABB	Continued review of most recent production	1.3	$375	$488
2012.03.02	CitiMortgage	SAB	Corresp re Texas hearing (.5); corresp re deposition schedule (.3); prep for depositions (.5)	1.3	$850	$1,105
2012.03.02	CitiMortgage	ABB	Continued review of most recent production	1.5	$375	$563
2012.03.03	CitiMortgage	JIM	Review e-mails about motion to quash hearing	0.2	$680	$136
2012.03.05	CitiMortgage	ABB	Finish review of most recent production and priv log	1.1	$375	$413
2012.03.06	CitiMortgage	SAB	Teleconf. w/ D. Bogo-Ernst re deposition scheduling and discovery issues (.3); prep for upcoming depositions (.5); drafted proposal re request for extension (.5)	1.3	$850	$1,105
2012.03.06	CitiMortgage	ABB	Revise discovery letter	0.9	$375	$338
2012.03.07	CitiMortgage	NJD	CitiMortgage deposition preparation	2.0	$375	$750
2012.03.07	CitiMortgage	JIM	Review hearing transcript and draft order about motion to quash and discuss w/ S. Bursor (1.0); Review notice of foreclosure sale about [CLASS MEMBER NAME REDACTED] property, discuss same with S. Bursor and have telephone calls with [CLASS MEMBER NAMES REDACTED] at BWW Law Group regarding same (2.0); assist with preparation for depositions of P. Hill, K. Subleski and A. Rhinehart (1.4)	4.4	$680	$2,992
2012.03.07	CitiMortgage	SAB	Prep for upcoming depositions	9.0	$850	$7,650
2012.03.07	CitiMortgage	ABB	Assist with preparing docs for deposition, help RIA set up Relativity	3.9	$375	$1,463
2012.03.07	CitiMortgage	RIA	put together documents for deposition	4.0	$180	$720
2012.03.08	CitiMortgage	JIM	Travel to Maryland and prepare for deposition of P. Hill (4.0); attend deposition of P. Hill (5.0); travel to site for Subleski and Rhinehart depositions and prepare on the way (2.5)	11.5	$680	$7,820
2012.03.08	CitiMortgage	SAB	Travel NYC to Columbia MD, prep en route (3.5); Deposition of Paulette Hill (5.5); travel Columbia MD to Hagerstown MD (3.0); prep for depositions of Kathy Subleski and April Rinehart (3.0)	15.0	$850	$12,750
2012.03.08	CitiMortgage	ABB	Research armed forces contacts	1.0	$375	$375
2012.03.09	CitiMortgage	JIM	Attend depositions of K. Subleski and A. Rhinehart and travel back to New York from same	12.0	$680	$8,160
2012.03.09	CitiMortgage	SAB	Corresp w/ L. Nale et al re discovery issues and request for extension of discovery deadline (1.0); Kathy Subleski deposition (3.5); April Rinehart deposition (3.0); conf. w/ D. Bogo-Ernst re discovery issues (.6); travel Hagerstown MD to NYC (5.3);	13.4	$850	$11,390
2012.03.09	CitiMortgage	ABB	Review and revise SAB letter to Court re deadline extensions, further research re third party review of mortgage files and determination of active duty status	3.1	$375	$1,163
2012.03.12	CitiMortgage	JIM	Review WSJ article about National Mortgage Settlement and discuss w/ S. Bursor (.4); Telephone call to R. Michael about foreclosure plans for [CLASS MEMBER NAME REDACTED] property (left voice-mail) (.1); Review order regarding motion to quash and calendar dates therefrom (.6); telephone calls with plaintiff about deposition scheduling and case update (.6); telephone call with [CLASS MEMBER NAME REDACTED] about case update and status of his foreclosure (.3); review e-mails and attachments from [CLASS MEMBER NAME REDACTED] (.6)	2.6	$680	$1,768
2012.03.12	CitiMortgage	SAB	Conf. w/ J. Marchese re deposition scheduling and Jorge Rodriguez's possible deployment to Afghanistan (.5); teleconf. w/ Judge Gardephe's law clerk re cancelling tomorrow's status conference (.2); corresp. w/ Citi's counsel re same (.2)	0.9	$850	$765
2012.03.12	CitiMortgage	ABB	Review order re motion to quash	0.7	$375	$263
2012.03.13	CitiMortgage	JIM	Review court filings for national mortgage settlement and discuss same with S. Bursor and A. Bundlie and update case status sheet regarding same	4.4	$680	$2,992

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DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2012.03.13	CitiMortgage	SAB	Conf. w/ J. Marchese re National Mortgage Settlement (.4); teleconf. w/ L. Nale and D. Bogo-Ernst to meet & confer re search criteria (.5); prep for call w/ Magistrate Judge Freeman (.5); conf. call w/ Magistrate Judge Freeman (.8); corresp w/ D. Ernst et al re deposition scheduling (.5)	2.7	$850	$2,295
2012.03.13	CitiMortgage	ABB	Research re National Mortgage Settlement	1.4	$375	$525
2012.03.14	CitiMortgage	JIM	Review article and docket in DOJ case (.4); review notice of additional settlement agreements and related exhibits and discuss with S. Bursor and A. Bundlie (2.9); revise and e-mail Ellis and Barrett Daffin deposition notices (.7); telephone call with D. Banks at Consumer Fraud Protection Bureau (.2)	4.2	$680	$2,856
2012.03.14	CitiMortgage	ABB	Research re contacting Mrs. Petraeus, draft and circulate Latreese Ellis and Barrett Daffin notices of deposition, review Citi doc production for indications of VA loan flags	3.8	$375	$1,425
2012.03.14	CitiMortgage	RIA	Rebooked flight for Dallas depos	0.3	$180	$54
2012.03.15	CitiMortgage	JIM	Telephone calls with Consumer Financial Protection Bureau about FOIA request (1.4); telephone call with J. Rodriguez about case update (.2)	1.6	$680	$1,088
2012.03.15	CitiMortgage	SAB	Teleconf. and corresp. w/ J. Marchese re communications with CFPB	0.5	$850	$425
2012.03.15	CitiMortgage	ABB	Corresp. w/ Dept. of Defense re SCRA database	0.4	$375	$150
2012.03.16	CitiMortgage	JIM	Draft e-mails to defense counsel about deposition scheduling and save deposition notes and transcripts to file	0.2	$680	$136
2012.03.16	CitiMortgage	SAB	Read transcripts of Hill, Subleski and Rinehart depositions (5.7); corresp. Re deposition scheduling (.3)	6.0	$850	$5,100
2012.03.16	CitiMortgage	ABB	Draft FOIA, follow up w Brandon Smith	1.5	$375	$563
2012.03.17	CitiMortgage	JIM	Review NYT article and HUD memorandum of review about Citimortgage foreclosure processes and e-mail same to S. Bursor and A. Bundlie	0.7	$680	$476
2012.03.18	CitiMortgage	JIM	Email exchange with S. Bursor about HUD memorandum of review about Citimortgage foreclosure processes	0.1	$680	$68
2012.03.19	CitiMortgage	JIM	Review developments with OCC's case, review and save updates to file and discuss same w/ S. Bursor (.7); confer w/ S. Bursor about remaining deposition dates and call and review e-mail from defense counsel about same (.3); save NYT article and HUD memorandum of review to case file and discuss same w/ S. Bursor in connection w/ class certification motion (.7)	1.7	$680	$1,156
2012.03.19	CitiMortgage	SAB	Conf. w/ J. Marchese re OCC settlement and litigation strategy (.5); conf. w/ J. Marchese re deposition scheduling (.2)	0.7	$850	$595
2012.03.19	CitiMortgage	ABB	FOIA, review HUD's Citi memo of review	1.7	$375	$638
2012.03.20	CitiMortgage	JIM	Review e-mails about deposition scheduling and update case calendar regarding same (.5); review e-mails about supplementary document production from Barrett Daffin, receive documents and arrange for uploading on document review system (.5); review Barrett Daffin supplementary documents and discuss w/ S. Bursor; telephone calls w/ defense counsel about Ellis and Barrett Daffin 30b6 deposition scheduling and defendant's intention to file a motion to modify the order to quash (.5); review defendant's motion to modify deposition dates and have telephone call w/ G. Lynch and S. Bursor regarding same (.3); review e-mail from S. Bursor to defense counsel about alternative deposition dates (.1);	1.9	$680	$1,292
2012.03.20	CitiMortgage	SAB	Analyzed Citi's motion to reschedule Texas depositions (.7); teleconf. w/ G. Lynch, J. Marchese and A. Bundlie re same (.3); drafted email to opposing counsel re same (.4)	1.4	$850	$1,190
2012.03.20	CitiMortgage	ABB	Sit in on conf call re TX depo dates, file related TX papers, confirm local counsel and compliance w local rules, discuss same w JIM and SAB, review Citi's letter asking to delay depos	2.3	$375	$863
2012.03.21	CitiMortgage	JIM	Telephone call with J. Rodriguez about his deposition date and case status update (.3); review Texas order to reschedule Ellis and Barrett Daffin depositions (.1); E-mail exchanges, telephone calls and internal conference about same (.8)	1.2	$680	$816
2012.03.21	CitiMortgage	SAB	Conf. call w/ G. Lynch and J. Marchese re motion to reschedule Texas depositions (.3); identified exhibits for our brief (.3)	0.6	$850	$510
2012.03.21	CitiMortgage	ABB	Revise and submit FOIA request	2.1	$375	$788
2012.03.22	CitiMortgage	JIM	Review e-mails and participate in call with all plaintiffs' counsel about upcoming depositions (1.0); telephone call with OCC about obtaining agreement in principle with Citi (.3); confer with A. Bundlie about potential OCC FOIA request and HUD memorandum of review about Citi's foreclosure practices (1.2)	2.5	$680	$1,700
2012.03.22	CitiMortgage	SAB	Revised draft FOIA request to CFPB (.2); conf. w/ J. Marchese re same (.2); conf. call w/ J. Wells and G. Lynch re Texas depositions (.5)	0.9	$850	$765
2012.03.22	CitiMortgage	ABB	Follow up on FOIA request, review and file Citi's notice of depo for Rodriguez, update calendar re TX depo dates	1.3	$375	$488

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DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2012.03.23	CitiMortgage	JIM	Telephone call w/ Rich Stearns at OCC about agreement in principle to settle w/ Citi (.2); discuss same w/ ABB (.1); review OCC's agreement in principle w/ Citi (.2); discuss process for requesting confidential documents from OCC w/ ABB (.2); coordinate w/ ABB to fax FOIA request to CFPB (.2); confer w/ SAB about preparation of trial exhibits (.1); telephone call to G. Lynch about order rescheduling Texas depositions (.2)	1.2	$680	$816
2012.03.23	CitiMortgage	SAB	Conf. w/ J. Marchese re litigation strategy (.4); analyzed deposition transcripts and video of Hill deposition (1.5); conf. w/ J. Marchese re Texas and St. Louis depositions (.4); conf. w/ R. Aldous and J. Marchese re handling of exhibits (.2)	2.5	$850	$2,125
2012.03.23	CitiMortgage	ABB	Fax FOIA request to CFPB; research OCC agreements in principle re mortgage servicer settlements and request process for confidential information; review March 12 HUD memo, search for any public versions of underlying documents	3.3	$375	$1,238
2012.03.23	CitiMortgage	RIA	Prepared depo exhibits	2.3	$180	$414
2012.03.26	CitiMortgage	JIM	Review CFPB FOIA request receipt letter and calendared relevant dates (.2); telephone conversations w/ D. Banks and B. Smith at CFPB about our FOIA request (.4); review documents including deposition transcript referenced in HUD's memorandum of review (.2); review deposition transcripts of K. Subleski and A. Rinehart (.3)	1.1	$680	$748
2012.03.26	CitiMortgage	SAB	Reviewed video excerpts from Subleski and Rinehart depositions (.7); conf. w/ J. Marchese and A. Bundlie re OCC foreclosure review materials (.7)	1.4	$850	$1,190
2012.03.26	CitiMortgage	ABB	Circulate and discuss w SAB and JIM HUD memo and public docs found, review FOIA confirmation	2.2	$375	$825
2012.03.27	CitiMortgage	JIM	E-mail exchange with co-counsel about supplemental privilege log from Barrett Daffin (.2); review supplemental privilege log from Barrett Daffin (.2); review order rescheduling Texas depositions (.1); update case status sheet with new dates and events (.1); confer w/ A. Bundlie about FOIA requests to HUD and OCC (.1)	0.7	$680	$476
2012.03.27	CitiMortgage	SAB	Drafted letter to D. Bogo-Ernst re followup to document requests arising from the Hill, Subleski and Rinehart depositions (1.4); legal research re class certification (.4); Drafted motion for summary judgment (4.7); drafted outline of class cert brief (2.8)	9.3	$850	$7,905
2012.03.27	CitiMortgage	ABB	Begin drafting FOIA re docs in HUD memo	0.9	$375	$338
2012.03.28	CitiMortgage	JIM	Telephone call w/ defense counsel about discovery data and confer w/ S. Bursor after same (1.0); review e-mail about 30(b)(6) deposition location and review draft deposition notice (.2); review e-mail from defense counsel setting forth results of discovery search, make notes regarding same and discuss w/ S. Bursor (.9)	2.1	$680	$1,428
2012.03.28	CitiMortgage	SAB	Teleconf. w/ L. Nale and D. Bogo-Ernst re Citi's data pull for class member loans (.6); conf. w/ J. Marchese re same (.3); analyzed D. Bogo-Ernst email (.2)	1.1	$850	$935
2012.03.28	CitiMortgage	ABB	Conducted HUD and OCC research	2.0	$375	$750
2012.03.28	CitiMortgage	RIA	Drafted deposition notice	0.3	$180	$54
2012.03.29	CitiMortgage	JIM	Revise case calendar (.1); prepare for and participate in all-parties teleconference with J. Freeman (.7); review e-mail from D. Bogo-Ernst about plaintiff's March 27 requesting production of additional documents (.1)	0.9	$680	$612
2012.03.29	CitiMortgage	SAB	Revised draft SJ brief (1.5); prep for telephonic hearing with Mag. J. Freeman (.7); telephonic hearing with Mag. J. Freeman (.6); research re eligibility for VA loans (.3)	3.1	$850	$2,635
2012.03.29	CitiMortgage	ABB	Draft and submit HUD FOIA request, attended telephonic hearing	2.8	$375	$1,050
2012.03.30	CitiMortgage	JIM	Review e-mail from defense counsel about documents producted concerning the VA claim (.1); review, revise and finalize HUD FOIA request (.5)	0.6	$680	$408
2012.03.30	CitiMortgage	SAB	Revised draft SJ brief (2.3); corresp w/ D. Ernst re discovery issues (.3); document review (.5)	3.1	$850	$2,635
2012.03.30	CitiMortgage	ABB	Finalize HUD FOIA, fax and mail	1.5	$375	$563
2012.04.03	CitiMortgage	JIM	Discuss Texas deposition preparation with S. Bursor (.3); update case status sheet (.2); e-mail co-counsel about scheduling a call to discuss the Texas depositions (.1)	0.6	$680	$408
2012.04.03	CitiMortgage	ABB	Calendar and follow up w HUD and CFPB FOIA requests	0.4	$375	$150
2012.04.04	CitiMortgage	NJD	Status update from SAB	0.8	$375	$281

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DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2012.04.04	CitiMortgage	JIM	Review Dealbook article about OCC review of bank mortgage files, discuss with A. Bundlie and review OCC website for documents and information relating to same (1.0); confer with A. Bundlie about Comptroller's March 26 remarks and the referenenced remediation report (.2); telephone call with CFPB FOIA contact and A. Bundlie about supplemental request for Petraeus warning letters (.3); review NYT articles about related SCRA case from 2007 and discuss with S. Bursor and A. Bundlie (.5); review, revise and finalize supplemental CFPB FOIA request (.4); confer with S. Bursor about Texas deposition preparation and e-mail J. Wells about same (.2); confer with S. Bursor about outstanding document requests (.2)	2.8	$680	$1,904
2012.04.04	CitiMortgage	SAB	Discussed upcoming depositions w/ J. Marchese & N. Deckant	0.5	$850	$425
2012.04.04	CitiMortgage	ABB	FOIA correspondence w Dominique Banks, circulate nytimes article re damages, paperwork mentioned in foreclosure review, review news stories	3.3	$375	$1,238
2012.04.05	CitiMortgage	JIM	Confer with S. Bursor about call with defense counsel to begin settlement discussions and review confidentiality agreement in furtherance of same	0.7	$680	$476
2012.04.05	CitiMortgage	SAB	Teleconf w/ L. Nale re settlement discussions	0.2	$850	$170
2012.04.05	CitiMortgage	ABB	Database research	2.2	$375	$825
2012.04.06	CitiMortgage	JIM	Review CNN article about approval of national mortgage settlement and draft e-mail to S. Bursor about same (.2); e-mail exchanges with S. Bursor about confidentiality agreement and preparation for Texas depositions (.5)	0.7	$680	$476
2012.04.06	CitiMortgage	SAB	Corresp w/ L. Nale et al re revisions to settlement confidentiality agreement (.8); conf. w/ N. Faruqi re settlement discussions (.3)	1.1	$850	$935
2012.04.06	CitiMortgage	ABB	Review and add edits to confidentiality agreement	1.2	$375	$450
2012.04.07	CitiMortgage	JIM	Draft e-mail about exhibits for Texas depositions (.2); review articles and documents about Citimortgage's participation in national mortgage settlement and save same to file (.8); draft e-mails to S. Bursor and A. Bundlie about findings (.2); review plaintiff acknowledgment and confer with J. Rodriguez about confidentiality agreement, acknowledgment and general case update (.4); e-mail exchange with J. Rodriguez and S. Bursor about signed plaintiff acknowledgment (.2)	1.8	$680	$1,224
2012.04.08	CitiMortgage	JIM	Review e-mail exchange about exhibits for Texas depositions	0.2	$680	$136
2012.04.09	CitiMortgage	JIM	Review congressional testimony of Cit managing director, Harold Lewis, regarding Citi's foreclosure practices and processes and draft e-mail to co-counsel about same	2.0	$680	$1,360
2012.04.10	CitiMortgage	NJD	Printing and document preparation for CitiMortgage settlement discussions	0.8	$375	$281
2012.04.10	CitiMortgage	JIM	Prepare for Barrett Daffin and L. Ellis depositions and travel to Dallas for same	6.0	$680	$4,080
2012.04.11	CitiMortgage	JIM	Prepare for depositions of Barrett Daffin 30(b)(6) witness and Latreese Ellis and confer with co-counsel about same (1.0); attend and participate in Barrett Daffin and Ellis depositions, confer with J. Wells about resulting testimony, and update S. Bursor resulting testimony (7.3); travel to NY from depositions (5.0)	13.3	$680	$9,044
2012.04.12	CitiMortgage	NJD	Case update discussion w/ JIM and ABB	0.5	$375	$188
2012.04.12	CitiMortgage	JIM	Review materials from Consumer Financial Protection Bureau and discuss same with A. Bundlie (.5); confer with A. Bundlie, N. Deckant and R. Aldous about testimony from the Barrett Burke and Ellis depositions (.5); review rough deposition transcripts (.5); telephone call with J. Rodriguez about case update (.3)	1.8	$680	$1,224
2012.04.12	CitiMortgage	ABB	Discuss TX depos w JIM, NJD, RIA	0.4	$375	$150
2012.04.12	CitiMortgage	ABB	Media research	0.9	$375	$338
2012.04.12	CitiMortgage	RIA	Received case status update	0.5	$180	$90
2012.04.13	CitiMortgage	NJD	Discussed case status and next steps with colleagues	1.0	$375	$375
2012.04.13	CitiMortgage	JIM	Review e-mail from J. Rodriguez and discuss arrangements for him to come to NYC	0.6	$680	$408
2012.04.13	CitiMortgage	RIA	Prepated for meeting with Jorge Rodriguez	2.2	$180	$396
2012.04.14	CitiMortgage	JIM	Prepare for meeting with J. Rodriguez	1.2	$680	$816
2012.04.16	CitiMortgage	JIM	E-mail exchange with Barrett Daffin counsel about newly produced document	0.2	$680	$136
2012.04.17	CitiMortgage	JIM	Update case status sheet regarding outstanding discovery issues (.2); attention to travel arrangements for upcoming depositions (.2); draft list of outstanding discovery issues and e-mail to SAB (.3); review defendant's interrogatory response and draft e-mail to SAB and ABB regarding same (.5)	1.2	$680	$816
2012.04.17	CitiMortgage	ABB	Uploaded new docs to Relativity, reviewed, discussed same w JIM	1.2	$375	$450
2012.04.18	CitiMortgage	JIM	Confer with S. Bursor about our 30(b)(6) deposition of Citi	0.2	$680	$136
2012.04.18	CitiMortgage	SAB	Analyzed Citi's belated rog answer and verification (.7); corresp w/ Citi's lawyers re discovery issues (.6); corresp w/ Citi's lawyers requesting deposition of Steven Smith (.2); read Engel deposition and Seybold deposition (1.3); prep for upcoming 30b6 deposition (.8)	3.6	$850	$3,060

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DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2012.04.18	CitiMortgage	ABB	Review SAB correspondence w DBE	0.3	$375	$113
2012.04.18	CitiMortgage	RIA	Prepped exhibits for O'Fallon Depo	1.5	$180	$270
2012.04.19	CitiMortgage	JIM	Confer with S. Bursor about transcripts from Texas depositions and review documents in preparation for deposing Citi's 30b6 witness	0.8	$680	$544
2012.04.19	CitiMortgage	SAB	Read Latreese Ellis deposition (1.0); conf. w/ J. Marchese re same (.5); conf. w/ R. Aldous re organization of deposition exhibits (.3); conf. w/ A. Vozzolo re Ellis & Seybold depositions (1.0); teleconf. w/ L. Nale and D. Ernst re upcoming 30b6 deposition (.3); corresp w/ co-counsel re same (.2); conf. w/ J. Marchese re same (.3)	3.6	$850	$3,060
2012.04.20	CitiMortgage	JIM	Review letter from D. Bogo-Ernst regarding supplemental requests for production of documents (.2); conduct research for class certification and summary judgment motions (.3)	0.5	$680	$340
2012.04.20	CitiMortgage	SAB	Prep for Smith deposition	1.0	$850	$850
2012.04.20	CitiMortgage	RIA	Drafted smith depo notice (.3), made copies of exhibts (2.0)	2.3	$180	$414
2012.04.23	CitiMortgage	JIM	Preparation for deposition of Defendant's 30(b)(6) witness and travel to O'Fallon, Missouri for same	7.3	$680	$4,964
2012.04.23	CitiMortgage	SAB	Prep for 30b6 Smith deposition, travel to O'Fallon, Missouri, and prep en route	8.5	$850	$7,225
2012.04.23	CitiMortgage	ABB	Prep for 30(b)(6) depo	1.4	$375	$525
2012.04.24	CitiMortgage	JIM	Prepare for and attend the deposition of Defendant's 30(b)(6) witness and travel back from O'Fallon, Missouri	14.3	$680	$9,724
2012.04.24	CitiMortgage	SAB	Steve Smith 30b6 deposition (8.5); travel O'Fallon MO to NYC (5.0)	13.5	$850	$11,475
2012.04.24	CitiMortgage	ABB	Upload new production docs, review same, assist w sending docs to JIM and SAB at depo, review similar HSBC complaint	1.3	$375	$488
2012.04.25	CitiMortgage	JIM	Meet with J. Rodriguez in connection with his upcoming deposition (4.3); review deposition transcript of P. Hill (1.0)	5.3	$680	$3,604
2012.04.25	CitiMortgage	SAB	Conf. w/ Jorge Rodriguez re deposition prep	5.5	$850	$4,675
2012.04.25	CitiMortgage	ABB	Rodriguez depo prep, order smart card reader	4.8	$375	$1,800
2012.04.26	CitiMortgage	JIM	Prepare for and attend the deposition of J. Rodriguez and confer with S. Bursor thereafter about making additional discovery requests based on same (8.5); review the deposition transcript of P. Hill (.6)	9.1	$680	$6,188
2012.04.26	CitiMortgage	ABB	Prep for and sit in on Rodriguez depo, discuss same w JIM and SAB	8.0	$375	$3,000
2012.04.27	CitiMortgage	JIM	Review deposition transcript of P. Hill (1.7); draft e-mail to Pentagon administrative specialist, Jeremy Warren, about making a FOIA request for DD 214 forms and Form 2-1, and about capabilities and suggestions for DOD's SCRA website (.3); draft e-mail to defense counsel requesting production of outstanding SCRA policy documents (.2); make travel arrangements for Wyatt deposition (.3); prepare for Wyatt deposition (5.0)	7.5	$680	$5,100
2012.04.27	CitiMortgage	SAB	Drafted plaintiff's second document request (.3); conf. w/ R. Aldous re deposition exhibits (.2); confs. w/ J. Marchese re prep for Wyatt deposition (.7)	1.2	$850	$1,020
2012.04.27	CitiMortgage	ABB	Review SAB's second doc request, follow up w Jeremy Warren at the OSD	0.2	$375	$75
2012.04.27	CitiMortgage	RIA	Prepped exhibits list (1.3), prepared set of exhibits (4.3)	5.6	$180	$1,008
2012.04.28	CitiMortgage	JIM	Prepare for deposition of April Wyatt	3.5	$680	$2,380
2012.04.28	CitiMortgage	SAB	Corresp w/ J. Marchese re litigation strategy and deposition prep	0.2	$850	$170
2012.04.29	CitiMortgage	JIM	Review Subleski and Smith deposition transcripts (3.0); prepare for Wyatt deposition (4.5)	7.5	$680	$5,100
2012.04.30	CitiMortgage	JIM	Travel to and prepare for Wyatt deposition (8.7); review e-mail from SCRA Verfication Service discussing newly available historical data for active duty periods, etc., and drafted e-mail to S. Bursor and A. Bundlie regarding same (.2)	8.9	$680	$6,052
2012.04.30	CitiMortgage	SAB	Teleconf. w/ J. Marchese re Wyatt deposition prep and litigation strategy	0.2	$850	$170
2012.04.30	CitiMortgage	ABB	Review changes to DoD and SCRA websites	0.6	$375	$225
2012.04.30	CitiMortgage	RIA	made complete set of exhibits	2.5	$180	$450
2012.05.01	CitiMortgage	JIM	E-mail exchange with A. Bundlie about changes to Department of Defense manpower website (.2); prepare for, take and travel from Wyatt deposition (14.5)	14.7	$680	$9,996
2012.05.01	CitiMortgage	ABB	Review database search changes, upload latest production to Relativity	1.0	$375	$375

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DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2012.05.02	CitiMortgage	JIM	Organize Wyatt deposition documents and save deposition notes to case file (.4); search DoD manpower SCRA 2.1 website for J. Rodriguez active duty dates (.1); confer with S. Bursor and A. Bundlie about search results and about the new historical active duty information being offered on the DoD SCRA 2.1 website (.3); telephone call to [CLASS MEMBER NAME REDACTED] regarding loan origination and foreclosure proceeding dates (.2); confer with S. Bursor and A. Bundlie about discovery motion and declaration concerning the new information offered by the DoD manpower SCRA 2.1 website (.5); gather backup documentation for discovery motion and begin working on declaration in support of same (2.8)	4.3	$680	$2,924
2012.05.02	CitiMortgage	SAB	Analyzed Smith 30b6 transcript (3.4); analyzed DMDC website SCRA 2.1 (1.8); confs. w/ J. Marchese, A. Bundlie and R. Aldous re same (.7); conf. w/ A. Vozzolo and N. Faruqi re Texas depositions and litigation strategy (1.3)	7.2	$850	$6,120
2012.05.02	CitiMortgage	ABB	Upload new production docs, review same	1.1	$375	$413
2012.05.02	CitiMortgage	RIA	Updated exhibit list (.2), marked transcript for refusals to answer (.7)	0.9	$180	$162
2012.05.03	CitiMortgage	JIM	Telephone call with [CLASS MEMBER NAME REDACTED] about case update (.2); review correspondence from [CLASS MEMBER NAME REDACTED] and e-mail same to S. Bursor (.2); review information for declaration in support of discovery motion (.3)	0.7	$680	$476
2012.05.04	CitiMortgage	JIM	Return telephone call to J. Rodriguez to provide case status update (.2); draft Marchese declaration in support of discovery motion and discuss same with S. Bursor (2.5)	2.7	$680	$1,836
2012.05.05	CitiMortgage	JIM	Finalize the draft of my declaration in support of plaintiff's discovery motion (4.6); e-mail same to S. Bursor and discuss with him by telephone (.3)	4.9	$680	$3,332
2012.05.05	CitiMortgage	SAB	Reviewed draft Marchese decl re SCRA 2.1	0.8	$850	$680
2012.05.07	CitiMortgage	JIM	Review deposition transcript of A. Wyatt	1.5	$680	$1,020
2012.05.10	CitiMortgage	RIA	Updated chronology with exhibits numbers	2.9	$180	$522
2012.05.11	CitiMortgage	RIA	Worked on chronology	1.8	$180	$324
2012.05.14	CitiMortgage	NJD	CitiMortgage settlement discussion	1.0	$375	$375
2012.05.14	CitiMortgage	JIM	E-mail to servicemember [CLASS MEMBER NAME REDACTED] about OCC settlement payment mistakes by Rust Consulting	0.2	$680	$136
2012.05.14	CitiMortgage	SAB	Conf. w/ N. Faruqi re litigation strategy (.5); analyzed L. Nale settlement proposal (1.0); conf. w/ R. Aldous re updated chronology (.4)	1.9	$850	$1,615
2012.05.14	CitiMortgage	ABB	Review Citi's proposed settlement structure	0.6	$375	$225
2012.05.15	CitiMortgage	NJD	Discussion of case status w/ ABB & JIM	0.5	$375	$188
2012.05.15	CitiMortgage	JIM	Review e-mail from S. Bursor about Wyatt deposition transcript	0.1	$680	$68
2012.05.15	CitiMortgage	SAB	Conf. w/ J. Marchese re litigation strategy (.3); reviewed Rachel's edits to the chronology (.6); analyzed Wyatt deposition transcript (1.1)	2.0	$850	$1,700
2012.05.15	CitiMortgage	ABB	Finalize review of latest production	2.2	$375	$825
2012.05.16	CitiMortgage	JIM	Review S. Bursor's notes about the deposition transcript of A. Wyatt	0.5	$680	$340
2012.05.16	CitiMortgage	SAB	Analyzed L. Nale settlement proposal (.7); conf. w/ J. Marchese re same and re litigation strategy (.3); conf. w/ J. Wells re Texas depositions and litigation strategy (.8); research re SCRA 2.1 and related issues (1.3)	3.1	$850	$2,635
2012.05.16	CitiMortgage	ABB	Follow up w HUD re FOIA	0.8	$375	$300
2012.05.17	CitiMortgage	NJD	Conduct document review	0.8	$375	$281
2012.05.17	CitiMortgage	NJD	Litigation and settlement strategy discussion with SAB and JIM	0.5	$375	$188
2012.05.17	CitiMortgage	JIM	Review draft of pre-motion letter to J. Gardephe about summary judgment and comment on same (.7); discuss case strategy with S. Bursor and N. Deckant (.3)	1.0	$680	$680
2012.05.17	CitiMortgage	SAB	Revised draft summary judgment motion and letter requesting pre-motion conference	5.8	$850	$4,930
2012.05.17	CitiMortgage	ABB	Review of latest doc production	1.0	$375	$375
2012.05.18	CitiMortgage	JIM	Review e-mails from co-counsel about pre-summary judgment motion letter to J. Gardephe (.3); review deposition transcript of J. Rodriguez (1.0); confer with S. Bursor about settlement discussions and participate in all-plaintiff's counsel call regarding settlement strategy (.7)	2.0	$680	$1,360
2012.05.18	CitiMortgage	SAB	legal research re timing of class cert and summary judgment, including analysis of Zimmerman docket (4.5); teleconf w/ L. Nale re settlement negotiations (.8); teleconf. w/ G. Lynch, J. Wells, J. Marchese, A. Bundlie re same (.7); teleconf w/ L. Nale re settlement negotiations (.2); conf. w/ J. Marchese & A. Bundlie re settlement strategy (.5)	6.7	$850	$5,695
2012.05.18	CitiMortgage	ABB	Review SAB's draft SJ letter	0.5	$375	$188

BURSOR & FISHER, P.A. -- RODRIGUEZ V. CITIMORTGAGE, INC. BILLING DIARIES THROUGH 9/2/2015						
DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2012.05.21	CitiMortgage	JIM	Review J. Rodriguez deposition transcript with J. Rodriguez (1.2); create errata sheet and discuss same with S. Bursor (.6); circulate signature page and errata sheet to J. Rodriguez (.1); review e-mail from J. Rodriguez (.1); review F.R.C.P. 30 and draft cover letter for signature and errata sheet (.2)	2.2	$680	$1,496
2012.05.22	CitiMortgage	JIM	Telephone call and e-mail to plaintiff regarding revised errata sheet	0.6	$680	$408
2012.05.24	CitiMortgage	SAB	Teleconf. w/ L. Nale re settlement discussions (.7); conf. w/ N. Faruqi re same (.6); conf. w/ J. Marchese re same (.4)	1.7	$850	$1,445
2012.05.27	CitiMortgage	JIM	Continue presuit investigation of SCRA foreclosure violations	0.9	$680	$612
2012.05.30	CitiMortgage	SAB	Teleconf. w/ L. Nale re settlement discussions (.6); conf. w/ J. Marchese re same (.3)	0.9	$850	$765
2012.05.30	CitiMortgage	ABB	Upload latest Citi docs to Relativity, review same, review Def's objections and responses	1.6	$375	$600
2012.05.31	CitiMortgage	ABB	Continue reviewing doc production	0.5	$375	$188
2012.06.01	CitiMortgage	NJD	Settlement strategy discussions w/ JIM, CM, and AV	1.0	$375	$375
2012.06.01	CitiMortgage	JIM	Conduct research regarding SCRA foreclosure violation provisions	0.5	$680	$340
2012.06.04	CitiMortgage	JIM	Confer with S. Bursor about case strategy	0.3	$680	$204
2012.06.04	CitiMortgage	SAB	Teleconf. w/ L. Nale re settlement discussions (.5); conf. w/ N. Faruqi re same (.6)	1.1	$850	$935
2012.06.04	CitiMortgage	ABB	Follow up re HUD FOIA	1.1	$375	$413
2012.06.05	CitiMortgage	SAB	Revised draft stip re extension and corresp. w/ opposing counsel and co-counsel re same	0.8	$850	$680
2012.06.06	CitiMortgage	JIM	Conduct research for class certification motion papers	0.9	$680	$612
2012.06.08	CitiMortgage	JIM	Telephone call with [CLASS MEMBER NAME REDACTED] regarding case status update	0.3	$680	$204
2012.06.08	CitiMortgage	SAB	Teleconf w/ Judge Gardephe's law clerk requesting letter explaining reason for 60-day extension (.1); voicemail and email to L. Nale re same (.1)	0.2	$850	$170
2012.06.11	CitiMortgage	JIM	Review e-mails and letter to J. Gardephe about stipulation for discovery extension, and confer with S. Bursor about case strategy	1.3	$680	$884
2012.06.11	CitiMortgage	SAB	Revised draft letter to J. Gardephe re stipulated 60-day extension (.5); Teleconf. w/ L. Nale re settlement negotiations (.2); conf. w/ J. Marchese and A. Vozzolo re same (.7)	1.4	$850	$1,190
2012.06.12	CitiMortgage	JIM	Confer with S. Bursor about settlement strategy	0.3	$680	$204
2012.06.12	CitiMortgage	SAB	Conf. w/ J. Marchese and A. Vozzolo re settlement discussions (.5); drafted email to L. Nale re same (.1)	0.6	$850	$510
2012.06.13	CitiMortgage	SAB	Corresp w/ L. Nale re settlement discussions (.3); reviewed revised scheduling order and corresp w/ court clerk re same (.3)	0.6	$850	$510
2012.06.14	CitiMortgage	ABB	Follow up re HUD FOIA	1.3	$375	$488
2012.06.18	CitiMortgage	JIM	Review June 12 scheduling order and update case calendar and status sheet regarding same	0.7	$680	$476
2012.06.18	CitiMortgage	ABB	Follow up re HUD FOIA	0.5	$375	$188
2012.06.19	CitiMortgage	JIM	Telephone with Chadwick Washington on behalf of [CLASS MEMBER NAME REDACTED] and draft letter to same regarding back homeowners dues (1.7); e-mail exchange with [CLASS MEMBER NAME REDACTED] regarding same (.2)	1.9	$680	$1,292
2012.06.21	CitiMortgage	JIM	Telephone call to J. Rodriguez about potential settlement	0.1	$680	$68
2012.06.21	CitiMortgage	SAB	Teleconf w/ L. Nale re settlement discussions (.5); corresp w/ co-counsel re same (.3)	0.8	$850	$680
2012.06.22	CitiMortgage	JIM	Confer with S. Bursor and Faruqi co-counsel regarding settlement strategy and review confidential settlement e-mail and related attachment from L. Nale	2.7	$680	$1,836
2012.06.22	CitiMortgage	SAB	Conf. w/ J. Marchese and A. Vozzolo re settlement strategy and litigation issues (2.4); reviewed draft confirmation of settlement in principle (1.0)	3.4	$850	$2,890
2012.06.22	CitiMortgage	ABB	Discuss settlement terms w JIM and NJD	1.0	$375	$375
2012.06.25	CitiMortgage	JIM	Draft e-mail to S. Bursor with comments on L. Nale's settlement communications	1.1	$680	$748
2012.06.25	CitiMortgage	SAB	Corresp w/ G. Lynch and J. Wells re proposed settlement terms	0.6	$850	$510
2012.06.26	CitiMortgage	NJD	Settlement discussion	1.0	$375	$375
2012.06.26	CitiMortgage	JIM	Confer with A. Bundlie and N. Deckant about settlement strategy (1.0); telephone call about case status with [CLASS MEMBER NAME REDACTED] (.5)	1.5	$680	$1,020
2012.06.28	CitiMortgage	NJD	Settlement discussion	1.3	$375	$469
2012.06.28	CitiMortgage	JIM	Confer with N. Deckant and S. Bursor about settlement proposal	1.0	$680	$680
2012.06.28	CitiMortgage	SAB	Analyzed settlement proposals	4.0	$850	$3,400
2012.06.29	CitiMortgage	JIM	Telephone call with co-counsel regarding proposal for settlement in principle	0.7	$680	$476
2012.06.29	CitiMortgage	SAB	Analyzed settlement proposal (2.4); conf. call w/ J. Wells and G. Lynch (.7)	3.1	$850	$2,635
2012.07.02	CitiMortgage	SAB	Conf. w/ A. Vozzolo re settlement terms and strategy	1.5	$850	$1,275
2012.07.06	CitiMortgage	SAB	Teleconf. w/ L. Nale re proposed settlement terms (.7)	0.7	$850	$595

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DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2012.07.09	CitiMortgage	JIM	Review correspondence from interested class member and confer with same	1.3	$680	$884
2012.07.10	CitiMortgage	JIM	E-mail exchange with J. Rodriguez regarding case status update (.3); telephone call to [CLASS MEMBER NAME REDACTED] (.2)	0.5	$680	$340
2012.07.11	CitiMortgage	JIM	Confer with S. Bursor about settlement strategy	1.0	$680	$680
2012.07.12	CitiMortgage	SAB	Teleconf. w/ L. Nale re settlement negotiations	0.8	$850	$680
2012.07.13	CitiMortgage	SAB	Teleconf. w/ L. Nale re settlement negotiations (.8); drafted letter to J. Gardephe re same (1.3)	2.1	$850	$1,785
2012.07.15	CitiMortgage	SAB	Read Citi's redline of my proposed letter to Judge Gardephe	0.3	$850	$255
2012.07.16	CitiMortgage	JIM	Confer with S. Bursor about draft settlement agreement from defense counsel	1.4	$680	$952
2012.07.16	CitiMortgage	SAB	Revised draft letter to J. Gardephe re stipulated 60-day extension and drafted proposed order re same (.5); corresp w/ D. Bogo-Ernst and L. Nale re settlement discussions (.3); conf. w/ J. Marchese re draft settlement terms (1.5)	2.3	$850	$1,955
2012.07.16	CitiMortgage	ABB	Review settlement documents, discuss negotiation strategy	1.3	$375	$488
2012.07.17	CitiMortgage	JIM	Review draft settlement agreement and confer with S. Bursor regarding same (3.7); review settlement update letter to J. Gardephe and proposed order to vacate existing deadlines (.3)	4.0	$680	$2,720
2012.07.17	CitiMortgage	SAB	Analyzed draft settlement agreement and various confs. w/ co-counsel re same	4.0	$850	$3,400
2012.07.17	CitiMortgage	ABB	Review settlement documents, discuss negotiation strategy	1.5	$375	$563
2012.07.17	CitiMortgage	RIA	Faxed letter to J. Gardephe	0.3	$180	$54
2012.07.18	CitiMortgage	JIM	Attention to proposed settlement agreement and settlement strategy	3.8	$680	$2,584
2012.07.18	CitiMortgage	SAB	Revised draft settlement documents	4.0	$850	$3,400
2012.07.18	CitiMortgage	ABB	Review settlement documents, discuss negotiation strategy	0.7	$375	$263
2012.07.19	CitiMortgage	JIM	Attention to draft settlement agreement and settlement strategy and confer with Faruqi co-counsel regarding same	3.7	$680	$2,516
2012.07.19	CitiMortgage	SAB	Revised draft settlement documents (3.8); reviewed order re stay and corresp w/ co-counsel re same (.2)	4.0	$850	$3,400
2012.07.19	CitiMortgage	SNW	Reviewed order staying case	0.2	$400	$80
2012.07.19	CitiMortgage	ABB	Review settlement documents, discuss negotiation strategy, research and circulate GAO report re SCRA compliance	1.9	$375	$713
2012.07.20	CitiMortgage	JIM	Prepare for and participate in teleconference with co-counsel regarding draft settlement agreement (1.0); attention to settlement and case strategy and confer with S. Bursor regarding same (2.8)	3.8	$680	$2,584
2012.07.20	CitiMortgage	SAB	Conf. call J. Wells and G. Lynch re draft settlement terms (.4); revised draft agreement (3.7)	4.1	$850	$3,485
2012.07.20	CitiMortgage	ABB	Assisted with drafting and revisions of settlement documents	1.1	$375	$413
2012.07.23	CitiMortgage	JIM	Update case status sheet regarding settlement developments	0.2	$680	$136
2012.07.23	CitiMortgage	ABB	Assisted with drafting and revisions of settlement documents	1.2	$375	$450
2012.07.24	CitiMortgage	NJD	CitiMortgage strategy discussion	0.8	$375	$281
2012.07.24	CitiMortgage	SAB	Settlement negotiations	1.0	$850	$850
2012.07.24	CitiMortgage	ABB	Assisted with drafting and revisions of settlement documents	0.9	$375	$338
2012.07.25	CitiMortgage	NJD	Read draft settlement proposal	0.5	$375	$188
2012.07.25	CitiMortgage	ABB	Assisted with drafting and revisions of settlement documents	0.9	$375	$338
2012.07.26	CitiMortgage	SAB	Revised draft settlement documents	2.5	$850	$2,125
2012.07.26	CitiMortgage	ABB	Assisted with drafting and revisions of settlement documents	1.2	$375	$450
2012.07.27	CitiMortgage	JIM	Revise settlement documents and attention to settlement negotiations	1.0	$680	$680
2012.07.27	CitiMortgage	SAB	Teleconf. w/ L. Nale re DOJ settlement terms and settlement negotiation (.4); revised draft settlement documents (4.0)	4.4	$850	$3,740
2012.07.27	CitiMortgage	ABB	Assisted with drafting and revisions of settlement documents	1.2	$375	$450
2012.07.30	CitiMortgage	SAB	Settlement negotiations	3.5	$850	$2,975
2012.07.30	CitiMortgage	ABB	Assisted with drafting and revisions of settlement documents	0.8	$375	$300
2012.07.31	CitiMortgage	NJD	Reviewed settelment offer, discussed SAB's opinions w/ JIM and ABB	1.0	$375	$375
2012.07.31	CitiMortgage	JIM	Confer with N. Deckant and A. Bundlie about settlement documents and strategy	1.0	$680	$680
2012.07.31	CitiMortgage	SAB	Revised draft settlement documents	3.4	$850	$2,890
2012.07.31	CitiMortgage	ABB	Discuss settlement strategy	1.0	$375	$375
2012.08.02	CitiMortgage	ABB	Assisted with drafting and revisions of settlement documents	1.8	$375	$675
2012.08.03	CitiMortgage	JIM	Review redlines to draft settlement agreement and e-mail exchange regarding same	1.0	$680	$680
2012.08.03	CitiMortgage	SAB	Teleconf. w/ L. Nale re settlement negotiations (.5); redlined draft settlement agreement (4.3)	4.8	$850	$4,080
2012.08.03	CitiMortgage	RIA	Drafted stipulation re settlement	0.3	$180	$54

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DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2012.08.04	CitiMortgage	SAB	Redlined draft settlement agreement and corresp w/ L. Nale re same	0.5	$850	$425
2012.08.08	CitiMortgage	NJD	Status update discussion w/ JIM	1.5	$375	$563
2012.08.20	CitiMortgage	SAB	Teleconf. w/ L. Nale re settlement negotiations (.5); reviewed L. Nale email and redlined settlement agreement (1.5)	2.0	$850	$1,700
2012.08.21	CitiMortgage	JIM	Review FOIA production from HUD and discuss with A. Bundlie	1.5	$680	$1,020
2012.08.21	CitiMortgage	ABB	Review HUD FOIA production	3.0	$375	$1,125
2012.08.22	CitiMortgage	ABB	Finish review of HUD FOIA docs	2.3	$375	$863
2012.09.04	CitiMortgage	JIM	Confer with S. Bursor and Faruqi counsel about ongoing settlement discussions and review most recent redlined version of settlement agreement from defense counsel	2.5	$680	$1,700
2012.09.04	CitiMortgage	SAB	Call and email to Lucia Nale re settlement (.2); corresp. w/ co-counsel re settlement negotiations (.5); conf. w/ N. Faruqi re same (.5)	1.2	$850	$1,020
2012.09.04	CitiMortgage	ABB	Review revised settlement proposal, research re same	2.0	$375	$750
2012.09.05	CitiMortgage	JIM	Review settlement documents and discuss with S. Bursor	1.0	$680	$680
2012.09.05	CitiMortgage	SAB	Called Lucia Nale re settlement	0.1	$850	$85
2012.09.10	CitiMortgage	ABB	Review revised settlement proposal, research re same	1.5	$375	$563
2012.09.11	CitiMortgage	JIM	Review draft letter to J. Gardephe and discussed draft settlement agreement, issues and timeline with S. Bursor and A. Vozzolo	1.8	$680	$1,224
2012.09.11	CitiMortgage	SAB	Teleconf. w/ L. Nale re settlement negotiations (.5); drafted letter to J. Gardephe re settlement negotiations (1.0); corresp. w/ co-counsel re settlement negotiations (.5); conf. w/ J. Marchese and A. Vozzolo re settlement negotiations (1.3)	3.3	$850	$2,805
2012.09.11	CitiMortgage	ABB	Review revised settlement proposal, research re same	1.4	$375	$525
2012.09.12	CitiMortgage	JIM	Review e-mail from L. Nale and her comments to the draft letter to J. Gardephe (.2); discuss settlement strategy with S. Bursor (.9)	1.1	$680	$748
2012.09.12	CitiMortgage	SAB	Revised draft letter to Judge Gardephe (.2); corresp w/ L. Nale re same (.2); conf. w/ J. Marchese and A. Vozzolo re settlement negotiations (.5)	1.4	$850	$1,190
2012.09.14	CitiMortgage	JIM	Review endorsed letter, e-mail R. Aldous about same and update case sheet with new conference date	0.2	$680	$136
2012.09.17	CitiMortgage	SAB	Teleconf. w/ D. Bogo-Ernst re settlement negotiations and upcoming status conference (.3); reviewed last version of settlement redlines (2.0)	2.3	$850	$1,955
2012.09.18	CitiMortgage	JIM	Case status update e-mail exchanges with J. Rodriguez	0.4	$680	$272
2012.09.18	CitiMortgage	SAB	Conf. w/ J. Marchese re settlement issues	0.5	$850	$425
2012.09.19	CitiMortgage	JIM	Review e-mail from J. Rodriguez and confer with internal team about settlement status	0.2	$680	$136
2012.09.25	CitiMortgage	SAB	Corresp w/ L. Nale re settlement negotiations	0.3	$850	$255
2012.10.02	CitiMortgage	SAB	Email to L. Nale re settlement negotiations	0.2	$850	$170
2012.10.08	CitiMortgage	JIM	Email exchange with J. Rodriguez about case progress	0.2	$680	$136
2012.10.09	CitiMortgage	SAB	Corresp & teleconf w/ L. Nale re settlement negotiations	0.2	$850	$170
2012.10.15	CitiMortgage	SAB	Returned call to Judge Gardephe's clerk Michael Grammer	0.2	$850	$170
2012.10.17	CitiMortgage	NJD	Reviewed email from our client	0.3	$375	$94
2012.10.26	CitiMortgage	JIM	Review e-mail from J. Rodriguez and confer with S. Bursor about same (.2); confer with N. Deckant about drafting limited power of attorney for plaintiff (.2); telephone call with J. Rodriguez and update S. Bursor about same (.4)	0.8	$680	$544
2012.11.15	CitiMortgage	NJD	Discussed status of settlement.	0.5	$375	$188
2012.11.15	CitiMortgage	SAB	Teleconf. w/ L. Nale re settlement negotiations (.6); drafted letter to J. Gardephe re same (.6); teleconf. w/ A. Vozzolo re same (.6)	1.8	$850	$1,530
2012.11.16	CitiMortgage	JIM	Review revised settlement terms and confer with internal team about same and telephone call to J. Rodriguez to provide case update	2.1	$680	$1,428
2012.11.16	CitiMortgage	SAB	Conf. w/ J. Marchese and A. Vozzolo to discuss settlement terms	2.0	$850	$1,700
2012.11.19	CitiMortgage	SAB	Corresp w/ L. Nale re settlement negotiations	0.5	$850	$425
2012.11.19	CitiMortgage	SNW	Reviewed endorsed letter to Judge Gardephe from SAB re: settlement status	0.2	$400	$80
2012.11.20	CitiMortgage	NJD	Discussion re CitiMortgage, upcoming discussion w/ L. Nale	0.8	$375	$281
2012.11.20	CitiMortgage	SAB	Settlement negotiations	3.5	$850	$2,975
2012.11.20	CitiMortgage	RIA	Printed documents for SAB	0.3	$180	$54
2012.11.26	CitiMortgage	JIM	Review correspondence from [CLASS MEMBER NAME REDACTED]	0.2	$680	$136
2012.11.27	CitiMortgage	JIM	Attention to settlement progress	0.8	$680	$544

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DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2012.11.27	CitiMortgage	SAB	Corresp w/ L. Nale re settlement negotiations	0.3	$850	$255
2012.11.29	CitiMortgage	SAB	Settlement negotiations	0.3	$850	$255
2012.11.30	CitiMortgage	JIM	Listen to voice-mail from [CLASS MEMBER NAME REDACTED], confer with S. Bursor about same and have telephone call with [CLASS MEMBER NAME REDACTED] about ongoing mortgage foreclosure issues	0.6	$680	$408
2012.11.30	CitiMortgage	SAB	Teleconf. w/ L. Nale re settlement -- revised drafts coming end of Monday	0.3	$850	$255
2012.12.03	CitiMortgage	NJD	CitiMortgage discussion	1.3	$375	$469
2012.12.03	CitiMortgage	JIM	Confer with S. Bursor about newest revised version of settlement agreement	0.5	$680	$340
2012.12.03	CitiMortgage	SAB	Reviewed revised draft settlement documents	2.0	$850	$1,700
2012.12.04	CitiMortgage	SAB	Reviewed revised draft settlement documents, preliminary approval order, final approval order, and class notice	4.6	$850	$3,910
2012.12.05	CitiMortgage	JIM	Attend conference call with other plaintiff's counsel to discuss most recent version of settlement agreement and drafting of preliminary approval papers	0.4	$680	$272
2012.12.05	CitiMortgage	SAB	Reviewed revised draft settlement documents (2.0); conf. call w/ J. Wells, G. Lynch, J. Marchese re same (.6)	2.6	$850	$2,210
2012.12.06	CitiMortgage	SAB	Reviewed edits to Citimortgage settlement documents	2.0	$850	$1,700
2012.12.07	CitiMortgage	JIM	Telephone calls with [CLASS MEMBER NAME REDACTED] regarding case status update, conduct investigation of [CLASS MEMBER NAME REDACTED] active duty dates, and confer with S. Bursor regarding same (2.4); e-mail signed Rodriguez acknowledgment to defense counsel and circulate signature page to confidentiality agreement to co-counsel (1.1)	3.5	$680	$2,380
2012.12.07	CitiMortgage	SAB	Reviewed edits to settlement documents (2.0); teleconf. w/ L. Nale re same (.4); conf. w/ J. Marchese re same (.5)	2.9	$850	$2,465
2012.12.10	CitiMortgage	JIM	E-mail exchange with Faruqi co-counsel regarding signatures for settlement confidentiality agreement	0.3	$680	$204
2012.12.11	CitiMortgage	JIM	Confer with co-counsel about finalizing confidentiality agreement	0.5	$680	$340
2012.12.12	CitiMortgage	JIM	Confer with co-counsel about finalizing confidentiality agreement and e-mail fully executed agreement to all parties (.4); review e-mail about draft preliminary approval brief and save to case file (.2)	0.6	$680	$408
2012.12.12	CitiMortgage	SAB	Conf. w/ J. Marchese re settlement negotiations (.3); corresp w/ J. Wells & G. Lynch re same (.3)	0.6	$850	$510
2012.12.12	CitiMortgage	SAB	Revised draft settlement documents	2.5	$850	$2,125
2012.12.17	CitiMortgage	JIM	Telephone calls with L. Nale about final settlement documents and timeline for preliminary approval brief filing (.3); e-mail and phone call to S. Bursor about same (.1); telephone call to J. Rodriguez about same (.1); telephone call with chambers to discuss settlement update (.2); review draft preliminary approval brief, comment on same, discuss with S. Bursor and Y. Kopel and conduct additional research for same (4.2)	4.9	$680	$3,332
2012.12.17	CitiMortgage	SAB	Reviewed draft preliminary approval motion (1.0); conf. w/ Y. Kopel and J. Marchese re same (1.0); research re same (.7)	2.7	$850	$2,295
2012.12.17	CitiMortgage	YZK	Draft Preliminary Approval Brief	3.5	$350	$1,225
2012.12.18	CitiMortgage	JIM	Confer with S. Bursor and Y. Kopel about additional revisions to preliminary approval brief (2.0); review e-mail from defense counsel and final settlement agreement and draft notice and proposed approval orders (1.0); e-mail and telephone call with J. Rodriguez about same (.2); e-mail to co-counsel about same (.1)	3.3	$680	$2,244
2012.12.18	CitiMortgage	SAB	Conf. w/ Y. Kopel & J. Marchese re drafting preliminary approval brief (.5); research re same (.6) reviewed execution copies and correspondence from L. Nale (4.0)	5.1	$850	$4,335
2012.12.18	CitiMortgage	YZK	Draft Preliminary Approval Brief, confer with JIM about same	11.0	$350	$3,850
2012.12.18	CitiMortgage	DLS	Assisted Yitz with formatting TOC for brief	1.6	$180	$288
2012.12.19	CitiMortgage	JIM	Assist with finalizing draft of preliminary approval brief and confer with co-counsel about signature pages for settlement agreement	2.4	$680	$1,632
2012.12.19	CitiMortgage	SAB	Conf. w/ J. Marchese re analysis of settlement documents (.2); corresp w/ J. Wells re same (.2); teleconf. w/ L. Nale re same (.3); read and executed settlement documents (3.0); teleconf. w/ L. Nale re same (.4)	4.1	$850	$3,485
2012.12.19	CitiMortgage	YZK	Draft Preliminary Approval Brief	1.9	$350	$665
2012.12.20	CitiMortgage	JIM	Attend status conference and continued revising preliminary approval motion	3.0	$680	$2,040
2012.12.20	CitiMortgage	SAB	Prep for status conference (1.0); conf. w/ L. Nale and T. Craparo re settlement negotiations (1.3); status conference (.6); drafted email to co-counsel re status conference (.3)	3.2	$850	$2,720
2012.12.21	CitiMortgage	JIM	Revise preliminary approval motion and e-mail exchanges about same	0.9	$680	$612
2012.12.21	CitiMortgage	SAB	Teleconf. w/ D. Bogo-Ernst re finalizing settlement documents (.3); reviewed settlement documents (.5); drafted email to J. Marchese & Y. Kopel (.2)	1.0	$850	$850
2012.12.22	CitiMortgage	JIM	Draft first amended class action complaint and stipulation to file same and discuss same with S. Bursor	4.4	$680	$2,992

BURSOR & FISHER, P.A. -- RODRIGUEZ V. CITIMORTGAGE, INC. BILLING DIARIES THROUGH 9/2/2015						
DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2012.12.24	CitiMortgage	JIM	Revise draft of preliminary approval brief and confer with S. Bursor about same	4.0	$680	$2,720
2012.12.24	CitiMortgage	SAB	Revised draft motion for preliminary approval and related documents	7.0	$850	$5,950
2012.12.26	CitiMortgage	JIM	Confer with Y. Kopel about preliminary approval papers, review e-mail exchanges with defense counsel about settlement agreement, proposed first amended complaint and stipulation for same, and send update e-mail to J. Rodriguez	0.7	$680	$476
2012.12.26	CitiMortgage	SAB	Revised draft motion for preliminary approval, draft settlement agreement, draft class notice (7.5); corresp w/ defense counsel and co-counsel re same (.5)	8.0	$850	$6,800
2012.12.27	CitiMortgage	JIM	Telephone call with defense counsel to discuss draft of preliminary approval brief and timing for filing same (.2); confer with co-counsel and client about re-signing revised settlement agreement (.6); create checklist for filing of FAC, settlement agreement and preliminary approval papers and discuss next steps with S. Bursor (.6); e-mail exchanges with defense counsel about revisions to settlement documents and proposed order for preliminary approval (.3); draft my declaration in support of preliminary approval and review deposition testimony for inclusion in same (4.0)	5.7	$680	$3,876
2012.12.27	CitiMortgage	SAB	Teleconf. w/ D. Bogo-Ernst and J. Marchese re finalizing settlement documents (.5); conf. w/ J. Marchese & Y. Kopel re same (.4); revised settlement documents (5.5)	6.4	$850	$5,440
2012.12.27	CitiMortgage	YZK	Draft Preliminary Approval Documents	3.6	$350	$1,260
2012.12.28	CitiMortgage	JIM	Telephone call with [CLASS MEMBER NAME REDACTED] about new HOA suit against her (.4); finalize and file fist amended complaint and motion for preliminary approval with exhibits and declaration in support and e-mail Word version of proposed preliminary approval order to clerk (8.4)	8.8	$680	$5,984
2012.12.28	CitiMortgage	SAB	Revised and executed settlement documents	10.0	$850	$8,500
2012.12.28	CitiMortgage	YZK	Draft Preliminary Approval Documents & Filed Amended Complaint at SDNY	4.1	$350	$1,435
2012.12.28	CitiMortgage	DLS	Prepared TOA and updated TOC for preliminary approval motion; emailed to JM; assisted JM for filing	2	$180	$360
2012.12.31	CitiMortgage	SAB	Prep for preliminary approval hearing	1.2	$850	$1,020
2012.12.31	CitiMortgage	RIA	Created court hearing books for SAB and JIM	1.2	$180	$216
2013.01.02	CitiMortgage	JIM	Confer with S. Bursor about HOA lawsuit against [CLASS MEMBER NAME REDACTED] and telephone calls to [CLASS MEMBER NAME REDACTED] about same and about case update	0.3	$680	$204
2013.01.02	CitiMortgage	SAB	Conf. w/ J. Marchese and Y. Kopel re preliminary approval motion (.2); reviewed docket (.2)	0.4	$850	$340
2013.01.02	CitiMortgage	YZK	Created courtesy copies for chambers and reviewed hearing materials	1.3	$350	$455
2013.01.02	CitiMortgage	RIA	Emailed FAC to clerk for filing	0.3	$180	$54
2013.01.03	CitiMortgage	JIM	Research law firm representing Brigadoon HOA in action against [CLASS MEMBER NAME REDACTED]	0.2	$680	$136
2013.01.04	CitiMortgage	JIM	Telephone call and e-mail exchange with defense counsel about notice of substitution for filed Settlement Agreement and confer with S. Bursor about same	0.6	$680	$408
2013.01.06	CitiMortgage	SAB	Teleconf. w/ J. Marchese re need to file corrected settlement agreement	0.3	$850	$255
2013.01.07	CitiMortgage	JIM	Confer with S. Bursor about filing corrected Marchese declaration, confer with defense counsel about same, review updated filing copy of settlement agreement and filing version of corrected Marchese declaration (1.8); telephone call and e-mail exchange with [CLASS MEMBER NAMES REDACTED] about case update, etc. (1.0)	2.8	$680	$1,904
2013.01.07	CitiMortgage	SAB	Teleconf. w/ L. Nale re need to file corrected settlement agreement and CAFA notice going out today (.3); conf. w/ J. Marchese re same (.4); reviewed corrections to settlement agreement (1.5)	2.2	$850	$1,870
2013.01.07	CitiMortgage	RIA	Formatted document	0.8	$180	$144
2013.01.11	CitiMortgage	RIA	Updated Citi books for SAB and JIM	0.3	$180	$54
2013.01.14	CitiMortgage	JIM	Telephone call with J. Gardephe's clerk about Wednesday's hearing	0.2	$680	$136
2013.01.15	CitiMortgage	JIM	Confer with S. Bursor about call with J. Gardephe's clerk (.2); find and check final Word version of proposed order granting final approval (.5)	0.7	$680	$476
2013.01.15	CitiMortgage	SAB	Teleconf. w/ J. Gardephe's clerk re prelim approval motion (.2); conf. w/ J. Marchese & R. Aldous re same (.2); reviewed proposed preliminary approval order and sent to Judge Gardephe's clerk (.5); prep for final approval hearing (2.0)	2.9	$850	$2,465
2013.01.15	CitiMortgage	RIA	Attention to prelim approval exhibit D	0.8	$180	$144
2013.01.16	CitiMortgage	JIM	Prepare for and attend preliminary approval hearing (2.5); telephone call to [CLASS MEMBER NAME REDACTED] about case update (.1); review signed preliminary approval order, save same to file and draft e-mail to co-counsel about next steps (.3)	2.9	$680	$1,972
2013.01.16	CitiMortgage	SAB	Prep for and attend preliminary approval hearing	3.0	$850	$2,550
2013.01.16	CitiMortgage	SNW	Reviewed order preliminarily approving settlement & class notice	0.4	$400	$160

BURSOR & FISHER, P.A. -- RODRIGUEZ V. CITIMORTGAGE, INC. BILLING DIARIES THROUGH 9/2/2015						
DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2013.01.17	CitiMortgage	JIM	Telephone call with [CLASS MEMBER NAMES REDACTED] about preliminary approval order and developments in their ongoing foreclosure-related litigation	0.9	$680	$612
2013.01.21	CitiMortgage	JIM	E-mail exchange with J. Rodriguez regarding SCRA website (.2); organize case file (.2); review preliminary approval order and settlement agreement and note operative dates for settlement process (.7)	0.9	$680	$612
2013.03.04	CitiMortgage	JIM	Review NYT article about more illegal bank foreclosures by Citi and other big banks against servicemembers and e-mail to S. Bursor and A. Vozzolo about checking in with defense counsel about progress with creating class list	0.4	$680	$272
2013.03.04	CitiMortgage	SAB	Corresp. w/ co-counsel and L. Nale re compiling the class list	0.5	$850	$425
2013.03.13	CitiMortgage	JIM	Confer with L. Nale about settlement review process progress	0.2	$680	$136
2013.03.25	CitiMortgage	JIM	Telephone call to defense counsel to discuss status of creation of class list	0.1	$680	$68
2013.04.08	CitiMortgage	JIM	Review e-mails and voice-mail from interested class members and respond to same	1.0	$680	$680
2013.04.09	CitiMortgage	JIM	Telephone call with interested servicemember, [CLASS MEMBER NAME REDACTED], about class action settlement (.3); telephone call with defense counsel about progress with government reviews related to class settlement (.3); confer with S. Bursor and Faruqi co-counsel about settlement progress and next steps relating to government reviews (2.5)	3.1	$680	$2,108
2013.04.09	CitiMortgage	SAB	Conf. w/ J. Marchese and A. Vozzolo re settlement issues	1.5	$850	$1,275
2013.04.10	CitiMortgage	JIM	Review article about status of payouts from OCC independent foreclosure review	0.3	$680	$204
2013.04.11	CitiMortgage	JIM	E-mail exchange with S. Bursor about payouts from OCC independent foreclosure review and e-mail clients about same; telephone call with [CLASS MEMBER NAME REDACTED] about IFR payment status	0.6	$680	$408
2013.04.30	CitiMortgage	JIM	Confer with S. Bursor about settlement progress and calendar follow up date with defense counsel in June	0.2	$680	$136
2013.05.13	CitiMortgage	JIM	E-mail exchange with servicemember [CLASS MEMBER NAME REDACTED] about OCC settlement and class action status	0.3	$680	$204
2013.06.11	CitiMortgage	JIM	Confer with S. Bursor about settlement progress and next steps	0.2	$680	$136
2013.06.13	CitiMortgage	JIM	Review news sources about progress with National Mortgage Settlement payments for borrowers from 2008 through 2011 and e-mail to internal team	0.2	$680	$136
2013.06.17	CitiMortgage	JIM	Review settlement agreement in connection with settlement progress letter to L. Nale and draft and circulate letter to defense counsel	1.8	$680	$1,224
2013.06.21	CitiMortgage	JIM	E-mail co-counsel about requesting a settlement conference with the court	0.2	$680	$136
2013.06.24	CitiMortgage	JIM	E-mail exchanges with defense counsel about settlement progress	0.3	$680	$204
2013.06.24	CitiMortgage	SAB	Reviewed corresp w/ Citi's counsel re status of settlement (.2); conf. w/ J. Marchese re same (.2)	0.4	$850	$340
2013.06.27	CitiMortgage	NJD	Drafted letter to Judge Gardephe requesting a settlement conference	1.5	$375	$563
2013.06.27	CitiMortgage	NJD	Responded to JIM email re letter to Judge Gardephe	0.3	$375	$94
2013.06.27	CitiMortgage	JIM	Telephone call and e-mail to D. Ernst about settlement status update (.4); review e-mail and letter from defense counsel, draft response e-mail and confer with N. Deckant about drafting settlement conference request letter to the court (1.2); review response e-mail from defense counsel (.2)	1.8	$680	$1,224
2013.06.28	CitiMortgage	JIM	Draft e-mail to defense counsel about availability for settlement conference with the court and revise letter to court requesting a conference	0.4	$680	$272
2013.06.29	CitiMortgage	NJD	Finalized letter for settlement conference and emailed to L. Nale	0.5	$375	$188
2013.06.29	CitiMortgage	JIM	Revise letter to Chambers requesting settlement conference and exchanged e-mails with defense counsel about same	1.6	$680	$1,088
2013.06.29	CitiMortgage	SAB	Revised draft letter to J Gardephe requesting status conference	0.5	$850	$425
2013.07.01	CitiMortgage	NJD	Finalized letter to Judge Gardephe	0.5	$375	$188
2013.07.01	CitiMortgage	NJD	Sent courtesy copy of Citi letter to all counsel of record	0.5	$375	$188
2013.07.23	CitiMortgage	JIM	E-mail exchange with J. Rodriguez about case status	0.2	$680	$136
2013.08.04	CitiMortgage	JIM	E-mail exchange with J. Rodriguez about case status	0.2	$680	$136
2013.08.12	CitiMortgage	JIM	Follow up telephone call with chambers about settlement conference request	0.3	$680	$204
2013.08.13	CitiMortgage	JIM	Review e-mail and attachments from [CLASS MEMBER NAME REDACTED] about National Mortgage Settlement Payment	0.2	$680	$136
2013.08.14	CitiMortgage	JIM	Telephone call from [CLASS MEMBER NAME REDACTED] (.1); telephone call to L. Nale about PwC review process (.1)	0.2	$680	$136
2013.08.16	CitiMortgage	JIM	Attention to [CLASS MEMBER NAME REDACTED] refund check issue from National Mortgage Settlement and draft e-mail regarding same (.6); telephone call to L. Nale and draft e-mail to L. Nale requesting settlement progress report (.4)	1.0	$680	$680

BURSOR & FISHER, P.A. -- RODRIGUEZ V. CITIMORTGAGE, INC. BILLING DIARIES THROUGH 9/2/2015						
DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2013.08.19	CitiMortgage	JIM	Draft e-mail to L. Nale about scheduling a call for a settlement progress update	0.1	$680	$68
2013.08.23	CitiMortgage	JIM	E-mail exchange with J. Rodriguez regarding case status update (.2); e-mail exchange with L. Nale about scheduling phone call for settlement progress update (.2); review letter from L. Nale about settlement progress update (.3); e-mail exchange with J. Rodriguez about same (.2)	0.9	$680	$612
2013.09.04	CitiMortgage	JIM	Meet and confer with S. Bursor and A. Vozzolo about settlement status and strategy	1.0	$680	$680
2013.09.04	CitiMortgage	SAB	Conf. w/ J. Marchese & A. Vozzolo re settlement progress	1.0	$850	$850
2013.09.24	CitiMortgage	JIM	Draft settlement update request e-mail to L. Nale and e-mail exchange with J. Rodriguez about settlement update	0.5	$680	$340
2013.10.01	CitiMortgage	JIM	Draft follow up settlement e-mail to defense counsel	0.1	$680	$68
2013.10.04	CitiMortgage	JIM	Confer with S. Bursor and A. Vozzolo about status of settlement and settlement progress	1.3	$680	$884
2013.10.04	CitiMortgage	SAB	Conf. w/ J. Marchese & A. Vozzolo re settlement progress	1.3	$850	$1,105
2013.10.07	CitiMortgage	JIM	Confer with S. Bursor about L. Nale's settlement update e-mail	0.2	$680	$136
2013.11.11	CitiMortgage	JIM	E-mail exchange with J. Rodriguez about case status	0.1	$680	$68
2013.11.18	CitiMortgage	JIM	Draft e-mail to D. Ernst about the status of file reviews in preparation for creating the class list	0.5	$680	$340
2013.12.16	CitiMortgage	JIM	E-mail exchange with J. Rodriguez about case status update	0.2	$680	$136
2013.12.17	CitiMortgage	JIM	Confer with S. Bursor about follow up e-mail to defense counsel about status of PwC review and draft and send same	0.6	$680	$408
2013.12.31	CitiMortgage	JIM	Telephone call with J. Rodriguez about case status	0.1	$680	$68
2014.01.03	CitiMortgage	JIM	E-mail exchange with J. Rodriguez about next steps for moving the settlement forward	0.2	$680	$136
2014.02.04	CitiMortgage	SAB	Conf. w/ N. Faruqi re settlement issues (.8)	0.8	$850	$680
2014.02.10	CitiMortgage	JIM	Review settlement progress correspondence (.5); draft letter to court requesting status conference to monitor settlement progress and assist with filing and courtesy copy of same (2.4); telephone call with class member [CLASS MEMBER NAME REDACTED] concerning homeowners' association lawsuit resolution (.6)	3.5	$680	$2,380
2014.02.10	CitiMortgage	RIA	Assisted with court filing	0.8	$180	$144
2014.02.10	CitiMortgage	ALG	Assisted with court filing	0.9	$180	$162
2014.02.14	CitiMortgage	JIM	Review response letter to court by defense counsel	0.2	$680	$136
2014.02.14	CitiMortgage	JIM	Status update e-mail to J. Rodriguez regarding this week's letters to chambers	0.1	$680	$68
2014.04.09	CitiMortgage	JIM	Review settlement progress corresponsence from L. Nale	0.2	$680	$136
2014.04.10	CitiMortgage	JIM	Review settlement documents, prepare draft response e-mail to defense counsel about settlement progress, confer with S. Bursor about same and send e-mail to defense counsel	1.7	$680	$1,156
2014.04.16	CitiMortgage	FJK	Assist w/ preparation for status conference and confer w/ J. Marchese re same	1.5	$300	$450
2014.04.16	CitiMortgage	JIM	Confer with S. Bursor about tomorrow's status conference with J. Gardephe (.2); prepare for status conference and confer with F. Klorczyk about same (3.8)	4.0	$680	$2,720
2014.04.16	CitiMortgage	ALG	Made status conference book for JIM (1.0)	1.0	$180	$180
2014.04.17	CitiMortgage	JIM	Prepare for and appear at in-court status conference and exchange e-mails with Sgt. Rodriguez to update him about same	3.7	$680	$2,516
2014.04.23	CitiMortgage	JIM	Calendar first 90-day reporting requirement for defendant per 4/17 hearing transcript	0.1	$680	$68
2014.04.24	CitiMortgage	JIM	Attention to SCRA litigation issues (.3); confer with S. Bursor about questions for DOJ regarding settlement status and progress (.3)	0.6	$680	$408
2014.04.24	CitiMortgage	SAB	Conf. w/ J. Marchese re settlement compliance issues	0.8	$850	$680
2014.04.28	CitiMortgage	JIM	Prepare for call with Amber Standridge at DOJ regarding settlement progress and called and left message with secretary for same (1.0); receive call from chambers about nature of 90-day reporting requirement and call L. Nale about same (.2); telephone with L. Nale and chambers about defendant's ongoing 90-day reporting requirement (.3)	1.5	$680	$1,020
2014.04.28	CitiMortgage	SAB	Conf. w/ J. Marchese re settlement progress	0.5	$850	$425
2014.04.29	CitiMortgage	NJD	Conf re progress of settlement	0.2	$375	$75
2014.04.29	CitiMortgage	FJK	Conf re progress of settlement	0.2	$300	$60
2014.04.29	CitiMortgage	JIM	Save and review order requiring defendant to provide ongoing 90 day case status updates and confer with internal team about settlement progress	0.4	$680	$272
2014.04.29	CitiMortgage	SAB	Conference regarding progress of settlement	0.2	$850	$170
2014.04.29	CitiMortgage	LTF	Conference regarding progress of settlement	0.2	$680	$136
2014.04.29	CitiMortgage	AMP	Discussion regarding settlement progress	0.2	$390	$78

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DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2014.04.29	CitiMortgage	YZK	Conference regarding progress of settlement	0.2	$350	$70
2014.04.29	CitiMortgage	YOK	Discussion regarding settlement progress	0.2	$300	$60
2014.04.29	CitiMortgage	JAL	Conference regarding progress of settlement	0.2	$300	$60
2014.04.29	CitiMortgage	ALG	Get DOJ contact information for J. Marchese	0.2	$180	$36
2014.04.29	CitiMortgage	SVG	Discussion regarding settlement progress	0.2	$180	$36
2014.04.30	CitiMortgage	JIM	Place follow up telephone call to A. Standridge at the DOJ regarding settlement progress and left message	0.1	$680	$68
2014.05.01	CitiMortgage	JIM	Telephone call with A. Standridge from U.S. Department of Justice to request progress update on foreclosure review for settlement purposes	0.3	$680	$204
2014.05.06	CitiMortgage	JIM	Telephone call with Texas counsel concerning status of and SCRA issues in Rodriguez case	0.6	$680	$408
2014.05.07	CitiMortgage	JIM	Review SCRA-related details of J. Rodriguez's legal claim and make follow-up telephone call to A. Standridge at the Department of Justice regarding same and regarding answers to my questions about the DOJ's foreclosure review process from April 30	0.3	$680	$204
2014.05.09	CitiMortgage	JIM	Telephone call to A. Standridge at DOJ regarding foreclosure review process	0.1	$680	$68
2014.05.14	CitiMortgage	JIM	Draft and circulate letter to A. Standridge at Department of Justice as a follow up to our May 1 phone call	1.0	$680	$680
2014.05.14	CitiMortgage	SAB	Revised draft letter to DOJ re creation of class list & conf. w/ J. Marchese re same	0.5	$850	$425
2014.05.19	CitiMortgage	JIM	Exchange e-mails with J. Rodriguez about case status update	0.1	$680	$68
2014.06.02	CitiMortgage	JIM	E-mail exchange with interested class member to provide progress update with the case	0.2	$680	$136
2014.06.10	CitiMortgage	JIM	Email exchange with J. Rodriguez about case status update	0.1	$680	$68
2014.06.11	CitiMortgage	JIM	Prepare for and make telephone call to A. Standridge at DOJ regarding settlement update	0.3	$680	$204
2014.06.12	CitiMortgage	JIM	Draft follow up e-mail to A. Standridge at DOJ regarding settlement progress	0.5	$680	$340
2014.06.18	CitiMortgage	JIM	Telephone call to interested class member regarding status of settlement	0.7	$680	$476
2014.07.17	CitiMortgage	ALG	Saved Citi's 90-day report to box and forward to SAB and JIM (.2)	0.2	$180	$36
2014.07.21	CitiMortgage	JIM	Telephone call with L. Nale about status of DOJ preliminary review and update S. Bursor about same	0.5	$680	$340
2014.07.21	CitiMortgage	SAB	Conf. w/ J. Marchese re Citi's 90-day progress report and recent communications with L. Nale	0.5	$850	$425
2014.07.22	CitiMortgage	JIM	E-mail exchange with J. Rodriguez about case update	0.1	$680	$68
2014.07.22	CitiMortgage	SAB	Analyzed Citi's 90-day progress report	0.3	$850	$255
2014.07.30	CitiMortgage	JIM	Telephone call to L. Nale regarding status of DOJ review and settlement progress	0.1	$680	$68
2014.08.01	CitiMortgage	JIM	Telephone call with L. Nale about settlement status update	0.1	$680	$68
2014.08.26	CitiMortgage	JIM	Telephone call with L. Nale regarding status of DOJ review and settlement progress, confer with S. Bursor about same, draft memo to file memorializing my conversation with L. Nale; review settlement documents to determine operative dates and next steps toward class notice and final approval	2.7	$680	$1,836
2014.08.26	CitiMortgage	SAB	Conf. w/ J. Marchese re status of DOJ review of PwC's determinations (.6); read J. Marchese memo re same (.1)	0.7	$850	$595
2014.08.26	CitiMortgage	AMP	Conf w/ JIM re status of DOJ review	0.1	$390	$39
2014.08.26	CitiMortgage	CRP	Created book of settlement agreement docs for SAB & JIM	0.5	$180	$90
2014.08.28	CitiMortgage	JIM	Draft e-mail to L. Nale about settlement progress and questions	0.2	$680	$136
2014.08.28	CitiMortgage	SAB	Reviewed settlement provisions re creation of class list and J. Marchese memo re recent communications with Citi's counsel (2.0); drafted email to L. Nale re same (.5)	2.5	$850	$2,125
2014.09.09	CitiMortgage	JIM	Telephone call with J. Rodriguez about settlement status	0.4	$680	$272
2014.10.01	CitiMortgage	JIM	Draft follow up e-mail to defense counsel about settlement status and review response email	0.1	$680	$68
2014.10.15	CitiMortgage	JIM	Exhange settlement update e-mails with defense counsel, review Citi's second 90-day report to the court, and confer with S. Bursor about next steps	0.4	$680	$272
2014.10.17	CitiMortgage	SAB	Read Citi's 90-day status update	0.3	$850	$255
2014.11.03	CitiMortgage	JIM	Draft settlement progress e-mail to J. Rodriguez	0.2	$680	$136
2014.11.10	CitiMortgage	JIM	Conduct legal research for final approval briefing	1.4	$680	$952
2014.11.11	CitiMortgage	JIM	Telephone call with L. Nale about settlement status update and notice proposal (.3); confer with S. Bursor, and co-counsel at Faruqi about same and review settlement agreement regarding L. Nale's notice proposal (.9)	1.2	$680	$816
2014.11.11	CitiMortgage	SAB	Conf. w/ J. Marchese re status of DOJ review to create class list and recent communications with Citi's counsel	1.0	$850	$850
2014.11.12	CitiMortgage	JIM	Review settlement agreement and proposed class notice regarding creation of the class list and class notice provisions and confer with L. Nale to continue our call from yesterday	1.6	$680	$1,088
2014.11.18	CitiMortgage	JIM	Draft follow up email to L. Nale	0.1	$680	$68

BURSOR & FISHER, P.A. -- RODRIGUEZ V. CITIMORTGAGE, INC. BILLING DIARIES THROUGH 9/2/2015						
DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2014.11.20	CitiMortgage	JIM	Telephone call with client, [CLASS MEMBER NAME REDACTED], about case status	0.2	$680	$136
2014.11.25	CitiMortgage	JIM	Telephone call to L. Nale regarding status of DOJ review and settlement progress	0.1	$680	$68
2014.11.26	CitiMortgage	JIM	Telephone call with L. Nale about settlement update and notice strategy and confer with J. Rodriguez and S. Bursor about same	1.0	$680	$680
2014.12.01	CitiMortgage	JIM	Review J. Rodriguez's DOJ settlement materials and email him about same; confer with L. Nale about noticing the class	0.8	$680	$544
2014.12.01	CitiMortgage	SAB	Conf. w/ J. Marchese re settlement progress (.5); read settlement letter Citi sent to J. Rodriguez (.4)	0.9	$850	$765
2014.12.02	CitiMortgage	JIM	Confer with and e-mail L. Nale about class notice and scheduling of final approval hearing	0.5	$680	$340
2014.12.03	CitiMortgage	JIM	Confer with L. Nale about final approval hearing date and class notice	0.2	$680	$136
2014.12.04	CitiMortgage	JIM	Telephone calls with L. Nale and the court regarding class notice and scheduling a fairness hearing; draft joint letter to chambers and confer with S. Bursor regarding same	2.5	$680	$1,700
2014.12.04	CitiMortgage	SAB	Conf. w/ J. Marchese and reviewed draft letter to Judge Gardephe	0.7	$850	$595
2014.12.04	CitiMortgage	ALG	Conf w/ JIM re settlement status and next steps	0.7	$180	$126
2014.12.05	CitiMortgage	NJD	Proofed settlement update letter, faxed to chambers, confirmed receipt, sent courtesy copies to all counsel of record	0.8	$375	$281
2014.12.05	CitiMortgage	NJD	Called ECF clerk to remove settlement letter from ECF	0.2	$375	$75
2014.12.05	CitiMortgage	JIM	E-mail exchange with L. Nale about faxing letter to the court and confer with N. Deckant about same; review ECF endorsed letter and confer with L. Nale about same	0.8	$680	$544
2014.12.08	CitiMortgage	JIM	Confer with L. Nale and S. Bursor about today's telephonic status conference with J. Gardephe and about additional letter submission to the court for scheduling of the fairness hearing; telephone call with chambers about rescheduled teleconference with the court	0.3	$680	$204
2014.12.08	CitiMortgage	SAB	Conf. w/ J. Marchese re communications with court staff re status of settlement	0.4	$850	$340
2014.12.09	CitiMortgage	JIM	Review draft letter to the court by defense counsel, confer with S. Bursor about same, review preliminary approval order and notice form, e-mail L. Nale back about comments to the letter, and confer with L. Nale about logistics of rolling class notice; e-mail exchange with J. Rodriguez about settlement progress	1.3	$680	$884
2014.12.17	CitiMortgage	JIM	Review fax order by court scheduling fairness hearing and forward to other plaintiffs' counsel; confer with L. Nale about class notice amendments and dissemintation	0.5	$680	$340
2014.12.18	CitiMortgage	JIM	Confer with S. Bursor regarding next steps for class notice	0.1	$680	$68
2014.12.18	CitiMortgage	SAB	Conf. w/ J. Marchese re order setting final approval hearing for 5/7/15	0.3	$850	$255
2014.12.19	CitiMortgage	JIM	Draft e-mail to L. Nale about form of class notice to be disseminated	0.1	$680	$68
2014.12.22	CitiMortgage	JIM	Review and comment on revised notice from defense counsel and call L. Nale back about same	0.5	$680	$340
2014.12.22	CitiMortgage	SAB	Conf. w/ J. Marchese re correspondence with L. Nale concerning modifications to the class notice	0.4	$850	$340
2014.12.23	CitiMortgage	JIM	Exchange e-mails and have telephone call with L. Nale regarding revised form of class notice	0.1	$680	$68
2014.12.24	CitiMortgage	JIM	Telephone call with L. Nale about opt-out and exclusion dates for class notice	0.3	$680	$204
2014.12.29	CitiMortgage	JIM	Telephone call to L. Nale regarding opt-out and exclusion dates for class notice; returned telephone call to [CLASS MEMBER NAME REDACTED]	0.9	$680	$612
2014.12.30	CitiMortgage	JIM	Confer with S. Bursor about settlement progress and about final approval briefing	0.5	$680	$340
2014.12.30	CitiMortgage	SAB	Conf. w/ J. Marchese re status of settlement	0.5	$850	$425
2015.01.05	CitiMortgage	JIM	Review revised draft class notice from defense counsel, make comments to same and confer with C. Comstock about my comments	0.7	$680	$476
2015.01.08	CitiMortgage	JIM	Status update telephone call with J. Rodriguez about settlement and final approval hearing	0.2	$680	$136
2015.01.10	CitiMortgage	JIM	E-mail defense counsel to follow up on the objection and opt-out deadline for class notice	0.1	$680	$68
2015.01.16	CitiMortgage	JIM	E-mail defense counsel about 90-day report to the court and about status of class notice	0.1	$680	$68
2015.01.21	CitiMortgage	JIM	Review proposed final draft of class notice and exchange e-mails with defense counsel to authorize dissemination of same	0.1	$680	$68
2015.01.21	CitiMortgage	SAB	Correspondence w/ opposing counsel re dissemination of notice and review of edits to notice	1.0	$850	$850
2015.01.23	CitiMortgage	JIM	E-mail exchange with defense counsel confirming dissemination of class notice; telephone call to L. Nale to follow up on completion of DOJ review	0.1	$680	$68
2015.02.03	CitiMortgage	JIM	Confer with L. Nale about update from DOJ	0.3	$680	$204
2015.02.09	CitiMortgage	YZK	Research re final approval briefing	2.5	$350	$875
2015.02.10	CitiMortgage	JIM	Conduct research for final approval briefing and confer with S. Bursor and Y. Kopel about same; review Feb. 9 DOJ press release regarding completion of foreclosure review, discuss same with S. Bursor, and e-mail and call L. Nale about same; organize case file	2.4	$680	$1,632

BURSOR & FISHER, P.A. -- RODRIGUEZ V. CITIMORTGAGE, INC. BILLING DIARIES THROUGH 9/2/2015						
DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2015.02.10	CitiMortgage	SAB	Conf. w/ J. Marchese re DOJ progress, reviewed DOJ Feb 9 press release, discussed implications for obtaining class list from L. Nale	1.0	$850	$850
2015.02.12	CitiMortgage	YZK	Draft fee and final approval briefing	5.2	$350	$1,820
2015.02.13	CitiMortgage	YZK	Draft fee and final approval briefing	3.1	$350	$1,085
2015.02.23	CitiMortgage	JIM	Attention to class notice and CAFA notice issues and confer with defense counsel and co-counsel regarding same	1.1	$680	$748
2015.02.24	CitiMortgage	JIM	E-mail exchange and telephone call with defense counsel about CAFA notice compliance	0.3	$680	$204
2015.02.25	CitiMortgage	JIM	Confer with A. Vozzolo and S. Bursor about draft of final approval brief (.3); telephone call to G. Lynch about creating lodestar table for fee application (.1)	0.4	$680	$272
2015.02.25	CitiMortgage	SAB	Teleconf. w/ J. Marchese and A. Vozzolo re drafting final approval briefs	0.4	$850	$340
2015.02.26	CitiMortgage	JIM	Telephone call with G. Lynch about case status and plan for final approval and fee briefing	0.4	$680	$272
2015.02.28	CitiMortgage	JIM	Work on attorney declaration and final approval and fee application papers	2.7	$680	$1,836
2015.03.05	CitiMortgage	JIM	Attention to final approval and fee papers	0.5	$680	$340
2015.03.12	CitiMortgage	JIM	Review DOJ website for news postings	0.2	$680	$136
2015.03.13	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.03.17	CitiMortgage	JIM	Telephone call from L. Nale about status of DOJ review	0.1	$680	$68
2015.03.17	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.03.18	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.03.20	CitiMortgage	JIM	Telephone call with C. Comstock about notice to 31 additional non-judicial class members and review notice form	0.3	$680	$204
2015.03.20	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.03.23	CitiMortgage	JIM	Confer with A. Vozzolo about final approval and fee briefing	0.7	$680	$476
2015.03.23	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.03.25	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.03.26	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.03.27	CitiMortgage	JIM	Conduct research for final approval and fee briefing	1.9	$680	$1,292
2015.03.30	CitiMortgage	JIM	Confer with S. Bursor about progress on fee application	0.3	$680	$204
2015.03.30	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.03.31	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.04.01	CitiMortgage	JIM	Work on fee brief	2.5	$680	$1,700
2015.04.01	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.04.02	CitiMortgage	ALG	Checked DOJ website (.1)	0.1	$180	$18
2015.04.07	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.04.08	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.04.09	CitiMortgage	JIM	Telephone calls to defense counsel about rescheduling fairness hearing	0.2	$680	$136
2015.04.09	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.04.10	CitiMortgage	JIM	E-mail exchanges with L. Nale about continuing fairness hearing	0.2	$680	$136
2015.04.13	CitiMortgage	JIM	Telephone call with L. Nale about draft letter to court continuing fairness hearing (.2); confer with S. Bursor and N. Deckant about process for subpoenaing federal government and review samples for intended subpoena to DOJ regarding settlement status (.7)	0.9	$680	$612
2015.04.13	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.04.14	CitiMortgage	JIM	Research process for subpoenaing federal government (.2); confer with S. Bursor about strategy to ascertain settlement progress (.2); e-mail L. Nale to request new DOJ contact information (.2)	0.6	$680	$408
2015.04.14	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.04.16	CitiMortgage	JIM	Review and comment on draft of joint settlement update letter to the court, and confer with defense counsel about details of settlement progress	1.4	$680	$952
2015.04.16	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.04.17	CitiMortgage	JIM	E-mail to and phone call with L. Nale to follow up about requested updated DOJ contact information	0.4	$680	$272
2015.04.20	CitiMortgage	JIM	Review faxed settlement status update letter to the court from L. Nale	0.1	$680	$68
2015.04.21	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.04.22	CitiMortgage	JIM	E-mail exchange and confer with J. Rodriguez about case update and settlement strategy (.4); call and e-mail L. Nale about rescheduling of fairness hearing and call the court's scheduling clerk about same (.5)	0.9	$680	$612
2015.04.23	CitiMortgage	ALG	Monitored DOJ website (.1); checked sources to monitor (.5)	0.6	$180	$108

BURSOR & FISHER, P.A. -- RODRIGUEZ V. CITIMORTGAGE, INC. BILLING DIARIES THROUGH 9/2/2015						
DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2015.04.27	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.04.28	CitiMortgage	JIM	Confer with A. Martinson at DOJ regarding settlement status update and confer with defense counsel and co-counsel about same (1.0); receive and review order rescheduling fairness hearing and e-mail co-counsel and defense counsel about same (.2)	1.2	$680	$816
2015.04.28	CitiMortgage	SAB	Teleconf. w/ J. Marchese re discussions with DOJ (.5); conf. w/ J. Marchese re same (.3)	0.8	$850	$680
2015.04.28	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.04.29	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.04.30	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.05.01	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.05.05	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.05.07	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.05.08	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.05.11	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.05.13	CitiMortgage	ALG	Monitored DOJ website (.2)	0.2	$180	$36
2015.05.14	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.05.19	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.05.21	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.05.26	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.05.28	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.06.01	CitiMortgage	JIM	Telephone call to L. Nale about Citi's direct call to J. Rodriguez, and call to A. Martinson at DOJ about foreclosure review status update	0.2	$680	$136
2015.06.02	CitiMortgage	JIM	Telephone call with A. Martinson at DOJ regarding status of foreclosure review (.2); telephone call with L. Nale (.1); telephone call with J. Rodriguez (.1)	0.4	$680	$272
2015.06.02	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.06.03	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.06.04	CitiMortgage	ALG	Monitored DOJ website (.1)	0.1	$180	$18
2015.06.24	CitiMortgage	JIM	Telephone call to A. Martinson at DOJ to check status of completion of foreclosure review	0.1	$680	$68
2015.07.01	CitiMortgage	JIM	Telephone call with A. Martinson at DOJ regarding completion of foreclosure review (.1); confer with S. Bursor and L. Nale about next steps for notice dissemination and final approval (.5); analyze preliminary approval order (.2)	0.8	$680	$544
2015.07.01	CitiMortgage	SAB	Multiple confs. w/ J. Marchese re completion of class list	0.8	$850	$680
2015.07.06	CitiMortgage	JIM	Telephone call with co-counsel about completion of DOJ review and next steps for final approval	0.5	$680	$340
2015.07.08	CitiMortgage	JIM	Draft attorney declaration in support of final approval	1.0	$680	$680
2015.07.09	CitiMortgage	JIM	Telephone call to L. Nale to discuss next steps for settlement process (.1); respond to servicememeber inquiry e-mail (.2)	0.3	$680	$204
2015.07.10	CitiMortgage	JIM	Telephone call with L. Nale about settlement update regarding completion of class list	0.3	$680	$204
2015.07.15	CitiMortgage	JIM	Telephone call with A. Martinson about status of class list (.1); calls and emails L. Nale about final class list (.8)	0.9	$680	$612
2015.07.20	CitiMortgage	JIM	Review draft of defendant's confidential settlement update letter, call C. Comstock about my comments, and confer with S. Bursor about next steps for finalizing settlement	1.1	$680	$748
2015.07.21	CitiMortgage	JIM	Telephone calls with defense counsel regarding status of class list and notice, and review defendant's draft status update letter to the court	0.5	$680	$340
2015.07.22	CitiMortgage	JIM	Review order resetting final approval hearing, calendar the new date and e-mail colleagues regarding same	0.2	$680	$136
2015.07.22	CitiMortgage	RSR	Scanned settlement letter and scheduling order faxes to file	0.2	$180	$36
2015.07.24	CitiMortgage	SAB	Read Citi's 90-day status update	0.5	$850	$425
2015.07.27	CitiMortgage	JIM	Create remaining timeline of operative settlement and final approval dates and discuss with S. Bursor	2.0	$680	$1,360
2015.07.27	CitiMortgage	SAB	Conf. w/ J. Marchese re preparation for final approval hearing	0.3	$850	$255
2015.07.28	CitiMortgage	JIM	E-mail L. Nale about status of class list and amended notice forms (.1); confer with co-counsel about next steps for notice and final approval (.4)	0.5	$680	$340
2015.07.29	CitiMortgage	JIM	Confer with co-counsel about preparations for final approval hearing and call and e-mail L. Nale about remaining class notice issues	0.9	$680	$612
2015.07.31	CitiMortgage	JIM	Review and comment on amended notice documents and email comments to defense counsel	0.7	$680	$476
2015.08.01	CitiMortgage	JIM	Attention to research for and drafting of final approval brief and accompanying declaration	2.0	$680	$1,360

BURSOR & FISHER, P.A. -- RODRIGUEZ V. CITIMORTGAGE, INC. BILLING DIARIES THROUGH 9/2/2015						
DATE	**MATTER**	**ATTY**	**DESCRIPTION**	**HOURS**	**RATE**	**AMOUNT**
2015.08.03	CitiMortgage	JIM	Exchange status update e-mails with J. Rodriguez and telephone call with J. Rodriguez (.2)	0.2	$680	$136
2015.08.10	CitiMortgage	JIM	Attention to final approval and fee papers and conduct research for same	2.3	$680	$1,564
2015.08.11	CitiMortgage	JIM	Review defendant's further redlines to notice form and draft email to defense counsel about same (.2); confer with S. Bursor about status of class list (.2); conduct research in support of fee application and draft Bursor declaration in support of final approval and fee motions (3.5)	3.9	$680	$2,652
2015.08.11	CitiMortgage	SAB	Conf. w/ J. Marchese re class notice and related settlement issues (.5); email to L. Nale re same (.2)	0.7	$850	$595
2015.08.12	CitiMortgage	JIM	Draft Bursor declaration in support of final approval of settlement (9.6); review letter from L. Nale and discuss with S. Bursor (.3); schedule settlement call with L. Nale and S. Bursor for tomorrow (.1)	10.0	$680	$6,800
2015.08.12	CitiMortgage	SAB	Conf. w/ J. Marchese re getting class list from L. Nale	0.2	$850	$170
2015.08.13	CitiMortgage	JIM	E-mail to co-counsel about settlement status update and declarations required for final approval (.1); telephone call with S. Bursor and defense counsel about progress with notice dissemination and class list creation (.3); review revised notice form from defense counsel, call the court with defense counsel about same, and confer with C. Comstock about next steps for dissemination of notice and getting notice declaration from Epiq (.5); confer with A. Vozzolo and Y. Kopel about final approval and fee briefing (.5)	1.4	$680	$952
2015.08.13	CitiMortgage	CRP	Compiled time & expense records	1	$180	$180
2015.08.14	CitiMortgage	JIM	Review e-mail from defense counsel about notice dissemination, review final notice form, and authorize dissemination of same	0.2	$680	$136
2015.08.14	CitiMortgage	YZK	Draft final approval and fee briefing	5.3	$350	$1,855
2015.08.17	CitiMortgage	JIM	Confer with Y. Kopel about status of fee application brief (.2); conduct research for final approval brief (1.0); review firm resume and attorney declaration from G. Lynch (.3); draft final approval brief (2.0)	3.5	$680	$2,380
2015.08.17	CitiMortgage	YZK	draft fee brief	2.8	$350	$980
2015.08.18	CitiMortgage	JIM	Review e-mail from C. Comstock about Citi verification, class list, and class notice status update (.1); review Citi verification (.2); participate in call to chambers about revised notice forms (.1); confer with C. Comstock about outstanding items for final approval (.1); update attorney declaration with new information about class notice and the Class List (.4); draft final approval brief (1.0); review endorsed letter from the court approving modified notice form for a subset of the class (.1); review changes to modified notice form and authorize dissemination of same (.2)	2.1	$680	$1,428
2015.08.18	CitiMortgage	YZK	Revise draft brief	6.0	$350	$2,100
2015.08.19	CitiMortgage	JIM	Email and confer with C. Korschun to schedule a time to inspect the class list (.3);	0.3	$680	$204
2015.08.19	CitiMortgage	YZK	Finalize and submit draft briefing to JIM	2.8	$350	$980
2015.08.24	CitiMortgage	JIM	Revise Bursor declaration (.5); review and revise draft of fee brief (7.6); confer with settlement class member, [CLASS MEMBER NAME REDACTED], regarding settlement questions based on class notice (.3)	8.4	$680	$5,712
2015.08.25	CitiMortgage	JIM	Continue revising draft fee brief (3.0); review and respond to email from defense counsel attaching confidential revised Citi verification (.2); visit Mayer Brown's office with S. Bursor to inspect the Class List (1.2); draft update e-mail to class member [CLASS MEMBER NAME REDACTED] (.2)	4.6	$680	$3,128
2015.08.25	CitiMortgage	SAB	Inspected class list at Mayer Brown's office (1.2); conf. w/ J. Marchese re same (.4)	1.6	$850	$1,360
2015.08.26	CitiMortgage	FJK	Call w/ J. Marchese re final approval and fee briefing (.2); revised brief (.8); further conf w/ J. Marchese & N. Deckant re schedule for fee brief and final approval brief (.2); revised & bluebooked & cite checked draft briefing (2.8);	4.0	$300	$1,200
2015.08.26	CitiMortgage	JIM	Confer with F. Klorczyk, N. Deckant and S. Bursor about draft fee and final approval briefs and schedule for filing same	0.5	$680	$340
2015.08.26	CitiMortgage	SAB	Conf. w/ J. Marchese re final approval drafts (.3); revised draft Bursor declaration (2.4); revised draft fee brief (1.5)	4.2	$850	$3,570
2015.08.28	CitiMortgage	NJD	Confer with FK re status of final approval brief	0.4	$375	$150
2015.08.28	CitiMortgage	JIM	Review S. Bursor's comments to attorney declaration and draft final approval and fee brief, and confer with F. Klorczyk about making changes	0.3	$680	$204
2015.08.30	CitiMortgage	FJK	Revised briefing & Bursor Decl. per S. Bursor's comments & researched final approval cases in 2d Cir.	1.6	$300	$480
2015.09.01	CitiMortgage	SAB	Drafted fee brief	3.0	$850	$2,550

EXHIBIT C

	A	B	C	D	E
1	**Rodriguez v. Citimortgage, Inc.**				
2					
3			$15,647.43		Filing, Court Reporter & Witness Fees
4			$69,762.30		Experts & Third Party Litigation Support Services
5			$4,141.48		Catering & Meals
6			$623.09		Duplication & Postage & Supplies
7			$11,024.70		Transportation
8			**$101,199.00**		**Total Expenses**
9					
10					
11	**Filing, Court Reporter, & Witness Fees**				
12					
13	**DATE**	**MATTER**	**AMOUNT**		**DESCRIPTION**
14	2011.05.27	Rodriguez v. Citimortgage, Inc.	$50.00		Mobile Notary fee for [CLASS MEMBER NAME REDACTED]
15	2011.05.27	Rodriguez v. Citimortgage, Inc.	$50.00		Mobile Notary fee for Jorge Rodriguez
16	2011.05.27	Rodriguez v. Citimortgage, Inc.	$50.00		Mobile Notary fee for [CLASS MEMBER NAME REDACTED]
17	2011.10.05	Rodriguez v. Citimortgage, Inc.	$350.00		Joe Marchese expense for filing fee
18	2012.02.02	Rodriguez v. Citimortgage, Inc.	$40.00		PricewaterhouseCoopers subpoena - witness fee
19	2012.02.09	Rodriguez v. Citimortgage, Inc.	$592.00		Keating & Walker service of subpoenas
20	2012.03.29	Rodriguez v. Citimortgage, Inc.	$1,836.70		Legalink invoice for Paulette Hill deposition
21	2012.03.29	Rodriguez v. Citimortgage, Inc.	$2,179.60		Legalink invoice for Rinehart and Subleski depositions
22	2012.04.05	Rodriguez v. Citimortgage, Inc.	$1,382.71		Legalink video for Subleski & Rinehart depos
23	2012.04.05	Rodriguez v. Citimortgage, Inc.	$1,105.08		Legalink video for Paulette Hill
24	2012.05.14	Rodriguez v. Citimortgage, Inc.	$1,359.40		Merrill Corp. Invoice 18208080
25	2012.05.14	Rodriguez v. Citimortgage, Inc.	$1,276.56		Merrill Corp. Invoice 18208445 Smith Depo
26	2012.05.16	Rodriguez v. Citimortgage, Inc.	$1,065.00		Legalink invoice 18209531
27	2012.05.17	Rodriguez v. Citimortgage, Inc.	$435.50		Merill Corp. invoice 18209265
28	2012.05.21	Rodriguez v. Citimortgage, Inc.	$3,071.46		Merill Corp.
29	2012.05.24	Rodriguez v. Citimortgage, Inc.	$1,438.75		Merrill Corp. invoice 18210138
30	2012.05.29	Rodriguez v. Citimortgage, Inc.	$1,287.45		Merrill Corp/ invoice 18209314
31	2012.07.27	Rodriguez v. Citimortgage, Inc.	$412.00		U.S. Treasury - FOIA Request
32	2012.09.04	Rodriguez v. Citimortgage, Inc.	$0.00		FOIA Request Payment - VOIDED and shredded check, wrote wrong
33	2012.09.04	Rodriguez v. Citimortgage, Inc.	$609.46		U.S. Treasury - HUD FOIA Request
34	2013.02.06	Rodriguez v. Citimortgage, Inc.	$17.22		SDNY Court reporter
35	2013.03.18	Rodriguez v. Citimortgage, Inc.	-$3,071.46		Legalink Refund
36	2015.01.09	Rodriguez v. Citimortgage, Inc.	$50.00		US Legal Support, Inc.
37	2015.02.10	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support, Inc.
38	2015.03.17	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support, Inc.
39	2015.05.05	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support Inc.
40			**$15,647.43**		**Total Filing, Court Reporter & Witness Fees**
41					
42					
43					
44	**Experts & Third Party Litigation Support Services**				
45					
46	**DATE**	**MATTER**	**AMOUNT**		**DESCRIPTION**
47	2012.03.28	Rodriguez v. Citimortgage, Inc.	$2,445.02		US Legal Support Invoice
48	2012.05.03	Rodriguez v. Citimortgage, Inc.	$2,774.43		US Legal Support Invoice
49	2012.08.03	Rodriguez v. Citimortgage, Inc.	$1,012.33		U.S. Legal Support, Inc. invoice # 3207032
50	2012.08.13	Rodriguez v. Citimortgage, Inc.	$1,330.07		US Legal Support Invoice # 320611
51	2012.09.04	Rodriguez v. Citimortgage, Inc.	$1,904.90		US Legal Support invoices 3205022, 3208022
52	2012.09.13	Rodriguez v. Citimortgage, Inc.	$11,844.16		US Legal Support, Inc. invoice #3206010
53	2012.09.13	Rodriguez v. Citimortgage, Inc.	$15,483.94		US Legal Support, Inc. invoice #3207031
54	2012.09.13	Rodriguez v. Citimortgage, Inc.	$11,077.62		US Legal Support, Inc. invoice #3208023
55	2012.09.13	Rodriguez v. Citimortgage, Inc.	$10,827.62		US Legal Support, Inc. invoice #3209007
56	2012.09.13	Rodriguez v. Citimortgage, Inc.	$887.33		US Legal Support, Inc. invoice #3209013
57	2012.10.12	Rodriguez v. Citimortgage, Inc.	$1,012.33		U.S. Legal Support, Inc. invoice # 3210007
58	2012.11.16	Rodriguez v. Citimortgage, Inc.	$887.33		US Legal Support Inc.
59	2012.12.06	Rodriguez v. Citimortgage, Inc.	$887.33		US Legal Support, Inc.
60	2013.01.23	Rodriguez v. Citimortgage, Inc.	$6,637.50		Economics and Technology, Inc., invoice #201205541
61	2013.03.21	Rodriguez v. Citimortgage, Inc.	$210.43		US Legal Support, Inc.
62	2013.04.01	Rodriguez v. Citimortgage, Inc.	$21.78		US Legal Support, Inc.
63	2013.04.04	Rodriguez v. Citimortgage, Inc.	$21.78		US Legal Support, Inc.
64	2013.05.13	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support, Inc. invoice 3304029
65	2013.06.17	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support, Inc. invoice #3305069
66	2013.07.25	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support Inc invoice 3306058
67	2013.09.03	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support
68	2013.09.12	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support
69	2013.10.10	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support, Inc.
70	2013.12.09	Rodriguez v. Citimortgage, Inc.	$40.00		US Legal Support, Inc.
71	2014.01.07	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support Inc
72	2014.03.10	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support Inc
73	2014.03.26	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support Inc
74	2014.04.02	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support Inc
75	2014.05.07	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support Inc

	A	B	C	D	E
76	2014.06.10	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support Inc
77	2014.08.04	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support Inc
78	2014.09.04	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support Inc
79	2014.10.07	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support Inc
80	2014.11.12	Rodriguez v. Citimortgage, Inc.	$40.00		US Legal Support Inc
81	2014.12.09	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support, Inc.
82	2015.04.08	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support Inc.
83	2015.07.14	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support Inc.
84	2015.07.14	Rodriguez v. Citimortgage, Inc.	$20.00		US Legal Support Inc.
85	2011.10.05	Rodriguez v. Citimortgage, Inc.	$36.40		Joe Marchese expense for SCRA verification report
86			**$69,762.30**		**Total Experts & Third Party Litigation Support Services**
87					
88					
89	**Catering & Meals**				
90					
91	**DATE**	**MATTER**	**AMOUNT**		**DESCRIPTION**
92	2011.11.17	Rodriguez v. Citimortgage, Inc.	$121.25		Lunch w/ J. Marchese, S. Bursor, N. Deckant to discuss CitiMortgage hearing
93	2012.02.15	Rodriguez v. Citimortgage, Inc.	$150.00		Lunch w/ A. Vozzolo & J. Marchese to discuss CitiMortgage case
94	2012.02.20	Rodriguez v. Citimortgage, Inc.	$48.35		Lunch w/ J. Marchese & R. Aldous to discuss CitiMortgage case
95	2012.02.23	Rodriguez v. Citimortgage, Inc.	$90.04		Seoul Garden
96	2012.03.07	Rodriguez v. Citimortgage, Inc.	$200.00		Kun Jip
97	2012.03.07	Rodriguez v. Citimortgage, Inc.	$89.84		Working dinner with JIM, RA, SAB
98	2012.03.08	Rodriguez v. Citimortgage, Inc.	$66.11		Working dinner with JIM
99	2012.04.04	Rodriguez v. Citimortgage, Inc.	$76.43		El Rio Grande
100	2012.04.11	Rodriguez v. Citimortgage, Inc.	$130.86		Pappasitos Cantina
101	2012.04.23	Rodriguez v. Citimortgage, Inc.	$14.88		Kitaro Bistro
102	2012.04.23	Rodriguez v. Citimortgage, Inc.	$64.21		Kitaro Bistro
103	2012.04.24	Rodriguez v. Citimortgage, Inc.	$11.30		The Grove JFK
104	2012.04.24	Rodriguez v. Citimortgage, Inc.	$11.74		Wendys
105	2012.04.24	Rodriguez v. Citimortgage, Inc.	$62.34		Mosaic Lambert International Airport
106	2012.04.25	Rodriguez v. Citimortgage, Inc.	$102.03		Fagiolini lunch w/ Jorge Rodriguez, JIM, ABB
107	2012.04.26	Rodriguez v. Citimortgage, Inc.	$89.04		The Cellar Bar
108	2012.04.30	Rodriguez v. Citimortgage, Inc.	$42.47		Ruby Tuesday
109	2012.05.01	Rodriguez v. Citimortgage, Inc.	$51.64		Lunch w/ A. Vozzolo to discuss litigation strategy in CitiMortgage
110	2012.05.30	Rodriguez v. Citimortgage, Inc.	$92.66		Court Bar - Dinner with JIM to discuss settlement
111	2012.06.11	Rodriguez v. Citimortgage, Inc.	$70.95		Zengo w/ JIM
112	2012.06.14	Rodriguez v. Citimortgage, Inc.	$168.52		Opia w/ ABB, JIM, NJD
113	2012.06.14	Rodriguez v. Citimortgage, Inc.	$52.00		Opia w/ ABB, JIM, NJD
114	2012.06.15	Rodriguez v. Citimortgage, Inc.	$61.26		Aquamarine w/ AV, JIM
115	2012.06.22	Rodriguez v. Citimortgage, Inc.	$41.12		Avra w/ JIM, AV, and G. Haber
116	2012.07.02	Rodriguez v. Citimortgage, Inc.	$78.50		Zengo lunch w/ AV
117	2012.07.11	Rodriguez v. Citimortgage, Inc.	$120.11		Serafina With SAB and RIA
118	2012.07.12	Rodriguez v. Citimortgage, Inc.	$40.62		Fagiolini with AV
119	2012.07.16	Rodriguez v. Citimortgage, Inc.	$67.70		Rare with JIM
120	2012.07.19	Rodriguez v. Citimortgage, Inc.	$89.15		Fagiolini
121	2012.08.01	Rodriguez v. Citimortgage, Inc.	$83.74		O'Neill's
122	2012.08.08	Rodriguez v. Citimortgage, Inc.	$211.36		Morrell Wine Bar
123	2012.09.04	Rodriguez v. Citimortgage, Inc.	$101.19		Zengo lunch w/ JIM, AV settlement discussion
124	2012.11.16	Rodriguez v. Citimortgage, Inc.	$215.09		Lunch w/ SAB, JIM, A. Vozzolo to discuss Citimortgage settlement
125	2012.11.21	Rodriguez v. Citimortgage, Inc.	$55.65		Benares
126	2012.11.25	Rodriguez v. Citimortgage, Inc.	$27.34		Lunch at Brooklyn Diner while working on settlement agreement
127	2012.12.03	Rodriguez v. Citimortgage, Inc.	$157.66		Haru - settlement discussions
128	2012.12.22	Rodriguez v. Citimortgage, Inc.	$28.84		Brooklyn Diner
129	2013.09.04	Rodriguez v. Citimortgage, Inc.	$171.91		Cici Italian
130	2013.10.04	Rodriguez v. Citimortgage, Inc.	$54.82		Rue 57 - SAB, JIM, AV
131	2014.04.10	Rodriguez v. Citimortgage, Inc.	$26.25		Chipotle
132	2014.04.16	Rodriguez v. Citimortgage, Inc.	$203.11		Red Eye Grill - JIM, FJK
133	2014.12.10	Rodriguez v. Citimortgage, Inc.	$93.30		Redeye Grill (SAB, JIM)
134	2014.12.12	Rodriguez v. Citimortgage, Inc.	$129.60		Redeye Grill (SAB, JIM, LTF)
135	2014.12.30	Rodriguez v. Citimortgage, Inc.	$146.84		Redeye Grill - SAB, JIM
136	2015.01.27	Rodriguez v. Citimortgage, Inc.	$47.37		Redeye Grill
137	2015.02.28	Rodriguez v. Citimortgage, Inc.	$6.96		McDonald's
138	2015.03.16	Rodriguez v. Citimortgage, Inc.	$75.33		CanCun - SAB & JIM (conf. re settlement administrator)
139			**$4,141.48**		**Total Meals**
140					
141					
142					
143	**Duplication, Postage & Supplies**				
144					
145	**DATE**	**MATTER**	**AMOUNT**		**DESCRIPTION**
146	2012.01.25	Rodriguez v. Citimortgage, Inc.	$26.67		FedEx
147	2012.04.26	Rodriguez v. Citimortgage, Inc.	$172.38		FedEx docs to depo
148	2012.04.26	Rodriguez v. Citimortgage, Inc.	$133.73		FedEx docs to depo

	A	B	C	D	E
149	2012.04.27	Rodriguez v. Citimortgage, Inc.	$141.53		FedEx
150	2012.04.29	Rodriguez v. Citimortgage, Inc.	$65.80		FedEx docs to depo
151	2013.01.06	Rodriguez v. Citimortgage, Inc.	$19.16		FedEx
152	2013.01.10	Rodriguez v. Citimortgage, Inc.	$19.68		FedEx
153	2014.02.10	Rodriguez v. Citimortgage, Inc.	$4.98		FedEx- faxed letter
154	2012.04.25	Rodriguez v. Citimortgage, Inc.	$39.16		Amazon.com - Military Card reader
155			**$623.09**		**Total Duplication, Postage & Supplies**
156					
157					
158	**Transportation**				
159					
160	**DATE**	**MATTER**	**AMOUNT**		**DESCRIPTION**
161	2011.11.17	Rodriguez v. Citimortgage, Inc.	$17.20		Taxi to court for initial status conference
162	2012.01.19	Rodriguez v. Citimortgage, Inc.	$5.00		American Airlines Dallas
163	2012.03.07	Rodriguez v. Citimortgage, Inc.	$76.50		Dial 7 Car
164	2012.03.07	Rodriguez v. Citimortgage, Inc.	$628.00		Acela train tickets for JIM and SAB, New York to Baltimore
165	2012.03.09	Rodriguez v. Citimortgage, Inc.	$17.20		Faber Shops BWI
166	2012.03.09	Rodriguez v. Citimortgage, Inc.	$316.00		Amtrak 2 tickets BWI to NY Penn
167	2012.03.09	Rodriguez v. Citimortgage, Inc.	$31.53		Gasoline
168	2012.03.09	Rodriguez v. Citimortgage, Inc.	$90.77		Hertz car rental
169	2012.03.09	Rodriguez v. Citimortgage, Inc.	$11.98		Courtyard Marriott
170	2012.03.09	Rodriguez v. Citimortgage, Inc.	$160.16		Courtyard Marriott room SAB
171	2012.03.09	Rodriguez v. Citimortgage, Inc.	$160.16		Courtyard Marriott room JIM
172	2012.03.10	Rodriguez v. Citimortgage, Inc.	$28.00		SAB reimbursement for 3/8 and 3/9 taxi fares
173	2012.03.12	Rodriguez v. Citimortgage, Inc.	$76.00		Dial 7 Car
174	2012.03.14	Rodriguez v. Citimortgage, Inc.	$55.00		Joseph I. Marchese travel expenses reimbursement
175	2012.03.22	Rodriguez v. Citimortgage, Inc.	$150.00		American Airlines - Fee for refunding SAB's miles for Dallas Depo
176	2012.03.23	Rodriguez v. Citimortgage, Inc.	$1,591.20		Roundrip airfare NY to STL for JIM and SAB for 30b6 deposition April
177	2012.04.02	Rodriguez v. Citimortgage, Inc.	$594.60		USAirway/Orbitz flight to Dallas
178	2012.04.03	Rodriguez v. Citimortgage, Inc.	$6.99		Orbitz service fee
179	2012.04.03	Rodriguez v. Citimortgage, Inc.	$1,088.80		American Airlines - JIM Flight to Dallas Depo
180	2012.04.10	Rodriguez v. Citimortgage, Inc.	$434.80		United Airlines - Dallas Depo flight change
181	2012.04.12	Rodriguez v. Citimortgage, Inc.	$80.50		Taxi
182	2012.04.12	Rodriguez v. Citimortgage, Inc.	$331.95		Grand Hyatt Dallas
183	2012.04.13	Rodriguez v. Citimortgage, Inc.	$682.20		United Airlines - J. Rodriguez to NYC for depo
184	2012.04.16	Rodriguez v. Citimortgage, Inc.	$53.20		Dial 7 Car - J. Rodriguez
185	2012.04.16	Rodriguez v. Citimortgage, Inc.	$62.10		Dial 7 Car - J. Rodriguez
186	2012.04.18	Rodriguez v. Citimortgage, Inc.	$58.00		Joe Marchese travel expenses reimbursement
187	2012.04.18	Rodriguez v. Citimortgage, Inc.	$55.00		Joseph I. Marchese travel expenses reimbursement
188	2012.04.20	Rodriguez v. Citimortgage, Inc.	$46.28		Hertz car rental
189	2012.04.23	Rodriguez v. Citimortgage, Inc.	$60.36		Taxi
190	2012.04.24	Rodriguez v. Citimortgage, Inc.	$140.36		O'Fallon Holiday Inn Express
191	2012.04.24	Rodriguez v. Citimortgage, Inc.	$32.98		Hertz car rental
192	2012.04.24	Rodriguez v. Citimortgage, Inc.	$140.36		O'Fallon Holiday Inn Express
193	2012.04.25	Rodriguez v. Citimortgage, Inc.	$39.24		Taxi
194	2012.04.25	Rodriguez v. Citimortgage, Inc.	$9.95		Gogo Flight Pass for WiFi access
195	2012.04.26	Rodriguez v. Citimortgage, Inc.	$77.70		United Airlines fee for J. Rodriguez flight change
196	2012.04.26	Rodriguez v. Citimortgage, Inc.	$150.00		United Airlines difference for new flight
197	2012.04.26	Rodriguez v. Citimortgage, Inc.	$189.20		Carmel Car Service - J. Rodriguez last minute car for flight change
198	2012.04.27	Rodriguez v. Citimortgage, Inc.	$1,744.28		The Bryant Park Hotel
199	2012.04.27	Rodriguez v. Citimortgage, Inc.	$363.00		Amtrak - JIM to depo
200	2012.04.29	Rodriguez v. Citimortgage, Inc.	$21.00		Parking
201	2012.04.30	Rodriguez v. Citimortgage, Inc.	$133.00		Amtrak
202	2012.05.01	Rodriguez v. Citimortgage, Inc.	$122.08		Inn at Charles Town
203	2012.05.01	Rodriguez v. Citimortgage, Inc.	$175.71		Hertz car rental
204	2012.05.01	Rodriguez v. Citimortgage, Inc.	-$52.10		Dial 7 Car - J. Rodriguez Refunded
205	2012.05.01	Rodriguez v. Citimortgage, Inc.	$6.50		Dial Car - JIM
206	2012.05.01	Rodriguez v. Citimortgage, Inc.	$82.00		Dial Car - JIM
207	2012.05.05	Rodriguez v. Citimortgage, Inc.	$21.00		Parking
208	2012.07.11	Rodriguez v. Citimortgage, Inc.	$14.75		Taxi
209	2012.09.07	Rodriguez v. Citimortgage, Inc.	$15.50		Taxi
210	2012.09.17	Rodriguez v. Citimortgage, Inc.	$19.88		Taxi
211	2012.11.22	Rodriguez v. Citimortgage, Inc.	$56.73		Mobil
212	2012.12.17	Rodriguez v. Citimortgage, Inc.	$54.50		Dial 7 Car
213	2012.12.18	Rodriguez v. Citimortgage, Inc.	$46.00		Dial 7 Car
214	2012.12.18	Rodriguez v. Citimortgage, Inc.	$73.50		Dial 7 Car
215	2012.12.22	Rodriguez v. Citimortgage, Inc.	$20.00		Parking
216	2013.01.16	Rodriguez v. Citimortgage, Inc.	$28.10		Taxi
217	2013.01.16	Rodriguez v. Citimortgage, Inc.	$35.00		Uber Car
218	2014.04.10	Rodriguez v. Citimortgage, Inc.	$78.50		Dial 7
219	2014.04.16	Rodriguez v. Citimortgage, Inc.	$79.50		Dial 7
220	2015.01.09	Rodriguez v. Citimortgage, Inc.	$80.50		Joseph Marchese
221	2015.02.28	Rodriguez v. Citimortgage, Inc.	$41.50		Maestro Parking
222	2015.03.09	Rodriguez v. Citimortgage, Inc.	$15.00		Joseph Marchese - reimbursement
223			**$11,024.70**		**Total Transportation**

EXHIBIT D

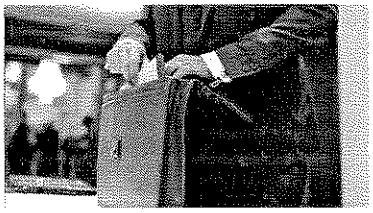
LAW | April 9, 2013, 4:48 p.m. ET

On Sale: The $1,150-Per-Hour Lawyer

Lawyer Fees Keep Growing, But Don't Believe Them. Clients Are Demanding, and Getting, Discounts

By JENNIFER SMITH

Top partners at leading U.S. law firms are charging more than ever before, yet those hourly rates aren't all they appear to be.

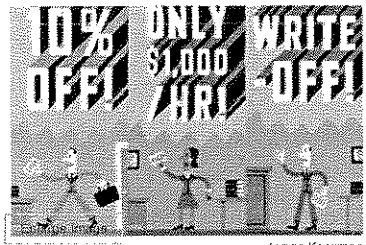


Top partners at leading U.S. law firms are charging more than ever -- routinely $1,150 or more an hour -- but after discounts and write-offs the nosebleed rates aren't all they appear to be. Jennifer Smith reports. Photo: Getty Images.

Having blown past the once-shocking price tag of $1,000 an hour, some sought-after deal, tax and trial lawyers are commanding hourly fees of $1,150 or more, according to an analysis of billing rates compiled from public filings.

But, as law firms boost their standard rates, many are softening the blow with widespread discounts and write-offs, meaning fewer clients are paying full freight. As a result, law firms on average are actually collecting fewer cents on the dollar, compared with their standard, or "rack," rates, than they have in years.

Think of hourly fees "as the equivalent of a sticker on the car at a dealership," said legal consultant Ward Bower, a principal at Altman Weil Inc. "It's the beginning of a negotiation....Law firms think they are setting the rates, but clients are the ones determining what they're going to pay."



James Kaczman

Star lawyers still can fetch a premium, and some of them won't budge on price. The number of partners billing $1,150-plus an hour has more than doubled since this time last year, according to Valeo Partners, a consulting firm that maintains a database of legal rates pulled from court filings and other publicly disclosed information. More than 320 lawyers in the firm's database billed at that level in the first quarter of 2013, up from 158 a year earlier.

That gilded circle includes tax experts such as Christopher Roman of King & Spalding LLP and Todd Maynes of Kirkland & Ellis LLP, intellectual-property partner Nader A. Mousavi of Sullivan & Cromwell LLP, and deal lawyers such as Kenneth M. Schneider of Paul, Weiss, Rifkind, Wharton & Garrison LLP.

Those lawyers and their firms either declined to comment or didn't reply to requests for comment.

When corporate legal departments need a trusted hand to fend off a hostile takeover or win a critical court battle, few general counsels will nitpick over whether a key lawyer is charging $900 an hour or $1,150 an hour. But for legal matters where their future isn't on the line, companies are pushing for—and winning—significant price breaks.

"We almost always negotiate rates down from the rack rates," said Randal S. Milch, general counsel for phone giant Verizon Communications Inc. VZ +0.29% The result, he said, is a "not-insignificant discount."

For the bread-and-butter work that many big law firms rely on, haggling has become the norm. Many clients grew accustomed to pushing back on price during the recession and continue to demand discounts.

Some companies insist on budgets for their legal work. If a firm billing by the hour exceeds a set cap, lawyers may have to write off some of that time.

Other clients refuse to work with firms who don't discount, lopping anywhere from 10% to 30% off their standard rates. Some may grant rate increases to individual partners or associates they deem worthy. Another tactic: locking in prices with tailored multiyear agreements with formulas governing whether clients grant or refuse a requested rate increase.

In practical terms, that means the gap between law firms' sticker prices and the amount of money they actually bill and collect from their clients is wider than it has been in years.

According to data collected by Thomson Reuters Peer Monitor, big law firms raised their average standard rate by about 9.3% over the past three years. But they weren't able to keep up on the collection side, where the increase over the same period was just 6%. Firms that used to collect on average about 92 cents for every dollar of standard time their lawyers worked in 2007, before the economic downturn, now are getting less than 85 cents. "That's a historic low," said James Jones, a senior fellow at the Center for the Study of the Legal Profession at Georgetown Law.

To be sure, things have certainly picked up some since the recession, when some clients flat-out refused to pay rate increases.

In the first quarter of 2013, the 50 top-grossing U.S. law firms boosted their partner rates by as much as 5.7%, billing on average between $879 and $882 an hour, according to Valeo Partners. Rates for junior lawyers, whose labors have long been a profit engine for major law firms, jumped even more.

While some clients resisted using associate lawyers during the downturn, refusing to pay hundreds of dollars an hour for inexperienced first- or second-year attorneys, the largest U.S. law firms have managed to send the needle back up again. This year, for the first time, the average rate for associates with one to four years of experience rose to $500 an hour, according to Valeo.

The increases continue the upward trend of 2012, when legal fees in general rose 4.8% and associate billing rates rose by 7.4%, according to a coming report by TyMetrix Legal Analytics, a unit of Wolters Kluwer, WKL.AE +0.95% and CEB, a research and advisory-services company. Those numbers are based on legal-spending data from more than 17,000 law firms.

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More than a dozen leaders at major law firms declined to discuss rate increases on the record, though some said privately that the increase in associate rates could be caused in part by step increases as junior lawyers gain in seniority.

Joe Sims, an antitrust partner at Jones Day and former member of the firm's partnership committee, said clients don't mind paying for associates, as long as they feel they are getting their money's worth.

Sophisticated clients, he said, tend to focus on the overall price tag for legal work, not on individual rates. "They are more concerned about how many people are working on the project and the total cost of the project," Mr. Sims said. "Clients want value no matter who is on the job."

While a handful of elite lawyers have successfully staked out the high end—the deal teams at Wachtell, Lipton, Rosen & Katz, for example—legal experts say that client pressure to control legal spending means most law firms must be considerably more flexible on price.

"There will always be some 'bet the company' problem where a client will not quibble about rates," said Mr. Jones, the Georgetown fellow. "Unfortunately, from the law firms' standpoint, that represents a small percentage of the work."

Write to Jennifer Smith at jennifer.smith@wsj.com

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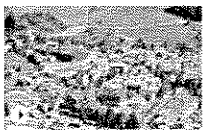
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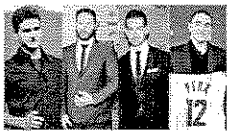

The 400 Richest Americans: Who's New on the List?

Steps to Better Foot Health

EXHIBIT E

THE AM LAW DAILY

The Firms

April 16, 2012 5:20 PM

When It Comes to Billing, Latest Rate Report Shows the Rich Keep Getting Richer

Posted by Sara Randazzo

Hourly rates just keep rising—and the best-paid lawyers are raising their rates faster than everyone else.

Those are two of the key findings contained in the 2012 Real Rate Report, an analysis of $7.6 billion in legal bills paid by corporations over a five-year period ending in December 2011. The report, released Monday, is the second such collaboration between TyMetrix, a company that manages and audits

legal bills for corporate legal departments, and the Corporate Executive Board.

Many of the new rate report's findings echo those contained in the 2010 study, including the fact that rates keep going up, almost across the board, and that the cost of a given matter can vary dramatically depending on a law firm's size and location and its relationship with a particular client.

At the same time, this year's study shows that the legal sector is becoming increasingly bifurcated, with top firms raising rates faster than those at the bottom of the market and large firms charging a premium price based purely on their size.

"What it's really showing is that there's an increased premium being paid for experience and expertise," says Julie Peck, vice president of strategy and market development at TyMetrix. "Some parts of the lawyer market are able to raise rates much more quickly, and are more impervious to economic forces then others."

To compile the current rate report, TyMetrix received permission from its clients to examine legal fees billed to 62 companies across 17 industries including energy, finance, retail, technology, insurance, and health care. The bills, which represent the amount actually paid by the companies in question rather than the amount initially charged, came from more than 4,000 firms in 84 metropolitan areas around the country. Every firm on the 2011 Am Law 100 is represented in the data.

The report's key data points include:

A Widening Gap: Hourly rates charged by lawyers in the legal sector's upper echelon grew faster between 2009 and 2011 than those charged by lawyers toiling on the lower rungs. Particularly striking was the jump in associate rates billed by those falling in the report's top quartile: 18 percent on average, to just over $600 per hour. Rates billed by top quartile partners, meanwhile, rose 8 percent, to just under $900 per hour. In the bottom quartile, associate rates rose 4 percent and partner rates rose 3 percent during the same period.

The Recession's (Minor) Toll: Even amid the economic downturn, the cost of an hour of a lawyer's time continued to rise faster than key measures of inflation. That said, the legal industry wasn't completely immune to the broader economy's slowdown. After rising 8.2 percent between 2007 and 2008, hourly rates rose just 2.3 percent in 2009. Law firms bounced back a bit last year, with rates climbing 5.1 percent, to an average of $530 an hour.

Location Counts: Not surprisingly, lawyers working in major metropolitan areas—where, as the rate report notes, rents are typically higher—are the priciest. An address in Boston, Chicago, Los Angeles, San Francisco, or Washington, D.C., alone adds about $161 to the hourly rate charged by an individual lawyer. Those six cities and Baltimore, Houston, Philadelphia, and San Jose are the ten U.S. markets with the highest hourly rates. With an average partner rate topping $700 per hour and average associate rate of more than $450 per hour, New York is the most expensive market in the country. The least expensive? Riverside, California, where the average partner bills at under $250 per hour and associates bill at just over $300 an hour.

In the Minority: A small group of lawyers—12 percent—bucked the trend toward higher fees and actually lowered rates between 2009 to 2011—and 3 percent trimmed rates by $50 or more per hour. (Most of those in the rate-cutting camp were based outside the big six markets identified above.) At the other end of the spectrum, 52 percent of lawyers increased rates by between $25 and $200 or more per hour. Another 18 percent increased rates by less than $25 per hour, and the final 18 percent held rates steady.

First-Year Blues: Even before the recession hit, clients balked at paying for what they considered on-the-job training for first-year associates. The latest rate report is likely to reinforce that reluctance, given its finding that using entry-level lawyers adds as much as 20 percent to the cost of a legal matter. The report offers evidence that firms may be accommodating clients on this front: The percentage of bills attributed to entry-level associates dropped from 7 percent in 2009 to 2.9 percent last year.

Ties That Bind: The more work one firm handles for a client—and the longer the client relationship extends—the higher the average rate the firm charges. For companies that paid one firm $10 million or more in a single year, the average hourly rate paid was $553 in 2011. By comparison, clients that limited their spending on an individual firm to $500,000 paid that firm an average of $319 per hour.

Four-Digit Frontier: Data has consistently shown that many lawyers hesitate to charge more than $1,000 an hour, and in 2011 just under 3 percent of the lawyers covered by the rate report had broken that barrier. Of those, the vast majority were working in the six main legal markets identified above and 60 percent of the time, they billed in increments of one hour or less.

Playing Favorites: Across all practice areas, 90 percent of lawyers charged different clients different rates for similar types of work. (The figure for mergers and acquisitions lawyers was 100 percent.) The differences from client to client can be extreme, and were even more pronounced in the current report than in the 2010 edition. Rates charged by intellectual property specialists, for instance, had a median variance of 23.1 percent, while lawyers doing commercial and contract work showed a 18.7 percent median difference.

Who's Doing What? A closer look at law firm bills for work performed on litigation and intellectual property assignments shows that the kind of timekeeper billing on a matter varies by practice type. On patent matters, the report shows, 47 percent of hours billed on average are attributed to paralegals, and 37 percent by partners. By comparison, paralegals account for just 8 percent of the work done on labor and employment litigation hours, while partners handle 45 percent.

Comments

The Big Law law firm is a dinosaur - a dieing species. This kind of self-interested greed will ultimately kill the beast.

Comment By Publicus - April 17, 2012 at 11:50 AM

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EXHIBIT F

FEBRUARY 23, 2011

Top Billers

Top attorneys in the U.S. are asking for as much as $1,250 an hour, according to recent court filings, significantly more than in previous years, as they take advantage of big clients willing to pay top dollar even amid the downturn. The move is contributing to price inflation across the struggling $100 billion global corporate law firm industry, where lawyers often study rival attorney fee filings in bankruptcy cases. **See which attorneys had some of the highest-known hourly rates in 2010 and 2009. Click on column headers to sort.**

<< first < prev 1 2 3 next > last >>

Name	Firm	Practice Area 1	Practice Area 2	Practice Area 3	Hourly Rate	Case Name	Date
Radke, Kirk A.	Kirkland & Ellis LLP	Corporate			$1,250	Reader's Digest Association Inc	2010
Teplin, Ian	Kirkland & Ellis LLP	Tax			$1,220	Visteon Corp.	2010
Schmidt, Gerhard	Weil Gotshal	Finance	Corporate	Mergers and Acquisition	$1,165	Aleris International	2010
Gon, Michelle Y.L.	Baker McKenzie	Real Estate	Mergers and Acquisition	Intellectual Property	$1,160	Motors Liquidation Company	2010
Shuttal, Andrew	Cleary Gottlieb	Bankruptcy			$1,160	Truvo	2010
McDonald, Michael	Cleary Gottlieb	Corporate	Mergers and Acquisition		$1,160	Truvo	2010
Vandermeersch, Dirk	Cleary Gottlieb	Environmental Litigation	Litigation		$1,130	Truvo	2010
Reding, Jacques	Cleary Gottlieb	Bankruptcy	Mergers and Acquisition	Equities	$1,130	Truvo	2010
McArdle, Wayne P.	Gibson Dunn	Corporate			$1,110	Lehman Brothers Holding Inc	2010
DuBois, Pierre-André	Kirkland & Ellis LLP	Intellectual Property			$1,105	Reader's Digest Association Inc	2010
Scheier, Brad	Fried Frank	Bankruptcy			$1,100	Stations Casinos	2010
Lewin-Smith, Guy	Debevoise & Plimpton LLP	Corporate			$1,080	MGI Inc	2010
Brown, Michael	Jones Day	Finance	Litigation	Regulatory	$1,075	Lehman Brothers Holding Inc	2010
Coffey, Lee	Jones Day	Litigation	International Law	Energy	$1,075	Lehman Brothers Holding Inc	2010
Stueck, Barnaby C.	Jones Day	Bankruptcy			$1,075	Lehman Brothers Holding Inc	2010
Kanan, Michael A.	Gibson Dunn	Litigation			$1,075	Almatis	2010
Brockway, David	Bingham McCutchen	Corporate			$1,065	Lehman Brothers Holding Inc	2010
Magee, John B.	Bingham McCutchen	Tax			$1,065	Lehman Brothers Holding Inc	2010
Nelson, William F.	Bingham McCutchen	Tax			$1,065	Lehman Brothers Holding Inc	2010
Pisillo, Bernie	Shearman & Sterling LLP	Tax			$1,065	Worldspace	2010
Meyerson, Lee	Simpson Thacher	Capital Markets	Mergers and Acquisition		$1,050	Washington Mutual	2010
Nasgos, Peter	Milbank Tweed	Finance			$1,050	Sea Launch Company	2010
Clayton, Lewis	Paul Weiss	Intellectual Property			$1,050	SP Wind Down Inc	2010
Flader, Robert	Paul Weiss	Labor and Employment			$1,050	SP Wind Down Inc	2010
Rohrenberg, Peter	Paul Weiss	Corporate	Tax		$1,050	SP Wind Down Inc	2010
Baronsky, Kenneth J	Milbank Tweed	Bankruptcy	Mergers and Acquisition	Securities Litigation	$1,050	Stations Casinos	2010
Palmer, Derryck A.	Cadwalader	Finance	Bankruptcy	Mergers and Acquisition	$1,050	Lyondell Chemical Company	2010
Aronzon, Paul	Milbank Tweed	Bankruptcy			$1,050	Lehman Brothers Holding Inc	2010

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Brey, Gregory	Milbank Tweed	Bankruptcy			$1,050	Midway Games Inc	2010
Dunne, Dennis	Milbank Tweed	Bankruptcy			$1,050	Lehman Brothers Holding Inc	2010
Schiff, Kenneth E.	Weil Gotshal	Mergers and Acquisitions			$1,030	Extended Stay Inc	2010
Kar, Partha	Kirkland & Ellis LLP	Bankruptcy			$1,030	Reader's Digest Association Inc	2010
Budd, Thomas M.	Gibson Dunn	Finance			$1,027	Lehman Brothers Holding Inc	2010
Moore, Robert Jay	Milbank Tweed	Bankruptcy			$1,025	Claim Jumper	2010
Daikin-Grimm, Linda	Milbank Tweed	Litigation			$1,025	Lehman Brothers Holding Inc	2010
Davis, Trayton M.	Milbank Tweed	Finance	Bankruptcy	Investment Funds Litigation	$1,025	Lehman Brothers Holding Inc	2010
Gruehlich, Jay D.	Milbank Tweed	International Law	Finance	Transportation	$1,025	Lehman Brothers Holding Inc	2010
Heller, David S.	Latham Watkins	Bankruptcy			$1,025	In re: NEC Holdings Corp.	2010
Hirschfeld, Michael	Milbank Tweed	Tax	Real Estate	Finance	$1,025	Lehman Brothers Holding Inc	2010
Maguil, Rainer	Milbank Tweed	Finance			$1,025	Lehman Brothers Holding Inc	2010
Tomback, Andrew E.	Milbank Tweed	Litigation	Finance		$1,025	Lehman Brothers Holding Inc	2010
Sharp, Richard	Milbank Tweed	Litigation			$1,025	Lehman Brothers Holding Inc	2010
Clowry, Karl J.K.	Paul Hastings	Corporate			$1,021	Lehman Brothers Holding Inc	2010
Eagan, Mark J.	Paul Hastings	Real Estate			$1,021	Lehman Brothers Holding Inc	2010
O'Sullivan, Ronan P.	Paul Hastings	Corporate	Real Estate		$1,021	Lehman Brothers Holding Inc	2010
Linder, Richard S.	Cleary Gottlieb	Corporate	Finance	Mergers and Acquisition	$1,020	Truvo	2010
Duncan, James A.	Cleary Gottlieb	Finance	Tax		$1,020	Truvo	2010
Pasaloo, James	Cleary Gottlieb	Tax			$1,020	Truvo	2010
Gorin, William F.	Cleary Gottlieb	Corporate	Government	Capital Markets	$1,020	Truvo	2010
Moloney, Thomas J.	Cleary Gottlieb	Bankruptcy	Litigation	Finance	$1,020	Truvo	2010

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Source: Veloc partners, Washington, D.C. Notes: Based on recent filings in a range of bankruptcy cases. Some lawyers may have standard hourly rates above what they charged in these cases.

(See correction.)

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Name	Firm	Practice Area 1	Practice Area 2	Practice Area 3	Hourly Rate	Case Name	Date
Aleksander, Nicholas P.B.	Gibson Dunn	Tax			$1,018	Lehman Brothers Holding Inc	2010
Rocher, Philip	Gibson Dunn	Litigation			$1,018	Lehman Brothers Holding Inc	2010
Thomas, Andrew S.V.	Gibson Dunn	Corporate			$1,018	Lehman Brothers Holding Inc	2010
Blyth, Mark	Linklaters	Litigation			$1,018	Nortel Networks	2010
Cox, Tim	Linklaters	Corporate			$1,018	Nortel Networks	2010
Sachdev, Neal V.	Kirkland & Ellis LLP	Corporate			$1,015	Visteon Corp	2010
Mayo, David	Paul Weiss	Tax			$1,015	SP Wind Down Inc	2010
Cohen, Joel	Gibson Dunn	Bankruptcy			$1,014	Almatis	2010
Sullivan, Peter	Gibson Dunn	Intellectual Property	Litigation		$1,014	Almatis	2010
Trinklein, Jeffrey	Gibson Dunn	Tax	Employee Benefits	Energy	$1,014	Almatis	2010
Vance, Janet L.	Gibson Dunn	Finance	Corporate		$1,014	Almatis	2010
Buttone, Steven P.	Gibson Dunn	Energy	Corporate	Finance	$1,009	Almatis	2010
Jowitt, Justin S.	Paul Hastings	Finance			$1,004	Lehman Brothers Holding Inc	2010
Gander, Fred R.	Dewey LeBoeuf LLP	Finance	Tax	Corporate	$1000	Ambac	2010
Vyskocil, Mary Kay	Simpson Thacher	Insurance	Litigation		$1000	Washington Mutual	2010
Brown, Alvin	Simpson Thacher	Employee Benefits	Executive Compensation		$1000	American Safety Razor Company	2010
Etherton, Joanne	Weil Gotshal	Mergers and Acquisitions			$1000	Lehman Brothers Holding Inc	2010
McCahill, Dominic T.	Weil Gotshal	Bankruptcy			$1000	Lehman Brothers Holding Inc	2010
Tringali, Joseph F.	Simpson Thacher	Litigation	Antitrust	Intellectual Property	$1000	American Safety Razor Company	2010
Francies, Michael	Weil Gotshal	Mergers and Acquisitions			$1000	Lehman Brothers Holding Inc	2010
Keller, Andy	Simpson Thacher	Corporate	Energy		$1000	Lehman Brothers Holding Inc	2010
Nave, Douglas	Weil Gotshal	Antitrust	Finance	Mergers and Acquisition	$1000	Motors Liquidation Company	2010
Norwood, Andrew R.	Weil Gotshal	Finance			$1000	Lehman Brothers Holding Inc	2010
Obrager, Barry R.	Simpson Thacher	Litigation			$1000	Washington Mutual	2010
Horspool, Anthony	Weil Gotshal	Bankruptcy			$1000	Lehman Brothers Holding Inc	2010
Kelly, Jacky	Weil Gotshal	Bankruptcy	Finance		$1000	Lehman Brothers Holding Inc	2010
Nicklin, Michael	Weil Gotshal	Bankruptcy	Finance	Equities	$1000	Lehman Brothers Holding Inc	2010
Shankland, Matthew	Weil Gotshal	Alternative Dispute Resolution			$1000	Lehman Brothers Holding Inc	2010
Martin, Stefan	Allen & Overy LLP	Labor and Employment			$1,152	BearingPoint	2009

Name	Firm	Practice Area 1	Practice Area 2	Practice Area 3	Hourly Rate	Case Name	Date
Huber, John J.	Latham Watkins	Capital Markets			$1,120	Aviza Technology	2009
Reynolds, Michael	Allen & Overy LLP	Mergers and Acquisitions			$1,111	Chemtura Corp.	2009
Norley, Lyndon E.	Kirkland & Ellis LLP	Bankruptcy			$1,110	Chemtura Corp.	2009
Norley, Lyndon E.	Kirkland & Ellis LLP	Bankruptcy			$1,100	Reader's Digest Association Inc	2009
Reiss, John M.	White & Case	Mergers and Acquisitions	Equities		$1,100	Heartland Automotive Holdings	2009
Gillespie, Stephen	Kirkland & Ellis LLP	Corporate			$1,080	Chemtura Corp.	2009
Nakata, Nobuo	Allen & Overy LLP	Corporate			$1,077	BearingPoint	2009
Brown, Stephen	Latham Watkins	Employee Benefits			$1,065	Aviza Technology	2009
Chanda, Kenneth D. C.	Latham Watkins	Mergers and Acquisitions			$1,065	Aviza Technology	2009
Flinn, Sean	Latham Watkins	Tax			$1,065	Aviza Technology	2009
Safran, Lawrence	Latham Watkins	Finance			$1,065	Aviza Technology	2009
Verburg, Leonard	Allen & Overy LLP	Labor and Employment			$1,065	BearingPoint	2009
Lee-Lim, Jiyeon	Latham Watkins	International Law	Tax		$1,065	Spansion	2009
Pistilo, Bernie	Shearman & Sterling LLP	Tax			$1,065	Worldspace	2009
Selder, Michael A.	Latham Watkins	Bankruptcy			$1,065	Spansion	2009
Stokkermans, Christiaan	Allen & Overy LLP	Corporate			$1,062	BearingPoint	2009
Pohl, Timothy	Skadden	Bankruptcy	Litigation		$1,050	Verasun Energy Corporation	2009
Lakritz, Thomas	White & Case	Bankruptcy			$1,050	Global Safety Textiles	2009
Mulaney, Charles W.	Skadden	Mergers and Acquisitions			$1,050	Hartmarx	2009
Rosen, Matthew A.	Skadden	Tax			$1,050	Hartmarx	2009
Zinnsky, Bruce	Cadwalader	Bankruptcy			$1,050	TH Agriculture	2009

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Name	Firm	Practice Area 1	Practice Area 2	Practice Area 3	Hourly Rate	Case Name	Date
Milmoe, J. Gregory	Skadden	Bankruptcy			$1,050	Interstate Bakeries	2009
Braun, Ellen	Allen & Overy LLP	Antitrust			$1,038	Chemtura Corp.	2009
Stroll, Neal	Skadden	Antitrust			$1,035	Verasun Energy Corporation	2009
Hayman, Linda C.	Skadden	Corporate	Mergers and Acquisition		$1,035	Interstate Bakeries	2009
Neckles, Peter J.	Skadden	Finance			$1,032	Interstate Bakeries	2009
MacLachlan, James	Baker McKenzie	Tax			$1,029	Miacom	2009
Keck, Colleen	Allen & Overy LLP	Corporate	Intellectual Property		$1,029	BearingPoint	2009
Keither, Eileen	Allen & Overy LLP	Mergers and Acquisitions			$1,029	BearingPoint	2009
Feuillet, Francois	Vinson & Elkins	Capital Markets	Energy	International Law	$1,028	MPF Holding US LLC and Official Committee Of Unsecured Creditors	2009
Rayman, David	Skadden	Tax			$1,026	Mark IV Industries	2009
Davenport II, Kirk	Latham Watkins	Capital Markets			$1,025	Dayton Superior	2009
Clayton, Lewis	Paul Weiss	Intellectual Property			$1,025	Tronox	2009
Fisch, Peter	Paul Weiss	Real Estate			$1,025	Tronox	2009
Kornberg, Alan	Paul Weiss	Bankruptcy			$1,025	Tronox	2009
Schimek, Terry	Paul Weiss	Finance			$1,025	Tronox	2009
Smith, Mark	Skadden	Corporate			$1,013	Mark IV Industries	2009
Hyde, Mark	Clifford Chance	Bankruptcy			$1,006	Lyondell Chemical Company	2009
Butters, James	Clifford Chance	Mergers and Acquisitions			$1,006	Lyondell Chemical Company	2009
Saferstein, Jeffrey	Paul Weiss	Bankruptcy			$1,005	Samsonite Company	2009
Meyerson, Lee	Simpson Thacher	Capital Markets	Mergers and Acquisition		$1000	Washington Mutual	2009
Finley, John	Simpson Thacher	Mergers and Acquisitions			$1000	Lehman Brothers Holding Inc	2009
Gover, Alan	White & Case	Bankruptcy			$1000	Hospital Partners	2009

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EXHIBIT G

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2010 NLJ Billing Survey

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Adams and Reese	New Orleans	$265	$550	$250	$344	$290	$195	$229
2010	Akerman Senterfitt	Miami							
2010	Akin Gump Strauss Hauer & Feld	Washington							
2010	Allen Matkins Leck Gamble Mallory & Natsis	Los Angeles							
2010	Alston & Bird	Atlanta	$515	$865	$450	$627	$590	$270	$405
2010	Andrews Kurth	Houston							
2010	Archer & Greiner	Haddonfield, NJ		$560	$305		$340	$175	
2010	Arent Fox	Washington		$765	$400		$475	$240	
2010	Armstrong Teasdale	St. Louis		$475	$300		$325	$200	
2010	Arnold & Porter	Washington							
2010	Baker & Daniels	Indianapolis							
2010	Baker & Hostetler	Cleveland							
2010	Baker Botts L.L.P.	Houston							
2010	Baker, Donelson, Bearman, Caldwell & Berkowitz	Memphis, TN	$312	$595	$255	$357	$320	$165	$231
2010	Ballard Spahr	Philadelphia							
2010	Barnes & Thornburg	Indianapolis	$367	$613	$298	$416	$355	$225	$261
2010	Bass, Berry & Sims	Nashville, TN							
2010	Benesch, Friedlander, Coplan & Aronoff	Cleveland	$315	$575	$350	$335	$360	$195	$245
2010	Best Best & Krieger	Riverside,Calif.		$550	$310		$395	$225	

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Bingham McCutchen	Boston							
2010	Blank Rome	Philadelphia	$510	$855	$440	$615	$550	$250	$361
2010	Bond, Schoeneck & King	Syracuse, NY	$260	$475	$220	$309	$280	$160	$208
2010	Briggs and Morgan	Minneapolis	$373	$600	$290	$437	$315	$210	$240
2010	Brinks Hofer Gilson & Lione	Chicago	$435	$725	$345	$541	$420	$195	$308
2010	Broad and Cassel	Orlando, Fl	$307	$475	$260	$372	$350	$175	$242
2010	Brown Rudnick	Boston							
2010	Brownstein Hyatt Farber Schreck	Denver	$391	$810	$295	$463	$360	$200	$256
2010	Bryan Cave	St. Louis	$464	$790	$370	$553	$550	$185	$344
2010	Buchalter Nemer	Los Angeles	$415	$625	$270	$490	$450	$195	$328
2010	Buchanan Ingersoll & Rooney	Pittsburgh		$900	$310		$465	$210	
2010	Burr & Forman	Birmingham, AL	$328	$500	$210	$361	$335	$200	$250
2010	Butzel Long	Detroit		$750	$300		$375	$200	
2010	Cadwalader, Wickersham & Taft LLP	New York							
2010	Cahill Gordon Reindel LLP	New York							
2010	Carlton Fields	Tampa, FL	$388	$775	$325	$465	$375	$195	$268
2010	Chadbourne & Parke	New York	$456	$995	$390	$769	$625	$110	$442
2010	Chapman and Cutler	Chicago							
2010	Clark Hill	Detroit							
2010	Cooley	Palo Alto, CA							
2010	Covington & Burling	Washington							
2010	Cozen O'Connor	Philadelphia	$422	$880	$310	$497	$585	$225	$326
2010	Crowell & Moring	Washington							
2010	Curtis, Mallet-Prevost, Colt & Mosle	New York	$489	$785	$675	$669	$575	$290	$365
2010	Davis Wright Tremaine	Seattle	$355	$795	$320	$486	$435	$210	$304
2010	Day Pitney	Florham Park, NJ							

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Dewey & LeBoeuf LLP	New York							
2010	Dickinson Wright	Detroit		$575	$355		$275	$195	
2010	Dickstein Shapiro	Washington	$546	$950	$525	$656	$530	$265	$426
2010	Dinsmore & Shohl	Cincinnati	$302	$590	$220	$360	$300	$175	$222
2010	DLA Piper	Chicago							
2010	Dorsey & Whitney	Minneapolis	$410	$795	$290	$515	$440	$180	$285
2010	Duane Morris	Philadelphia	$483	$850	$240	$550	$480	$135	$349
2010	Dykema Gossett	Detroit	$445	$635	$360	$495	$450	$225	$325
2010	Eckert Seamans Cherin & Mellott	Pittsburgh		$625	$250		$320	$150	
2010	Edwards Angell Palmer & Dodge	Boston	$451	$780	$345	$571	$610	$200	$323
2010	Epstein Becker & Green	New York	$429	$850	$350	$520	$450	$160	$325
2010	Faegre & Benson LLP	Minneapolis							
2010	Finnegan, Henderson, Farabow, Garrett & Dunner	Washington							
2010	Fish & Richardson	Boston							
2010	Fisher & Phillips	Atlanta		$605	$340		$360	$220	
2010	Fitzpatrick, Cella, Harper & Scinto	New York		$730	$460		$440	$275	
2010	Foley & Lardner	Milwaukee	$554	$1,035		$664		$255	$426
2010	Foley Hoag	Boston							
2010	Ford & Harrison	Atlanta		$620	$375		$390	$250	
2010	Fowler White Boggs	Tampa, FL	$350	$575	$325	$400	$315	$205	$250
2010	Fox Rothschild	Philadelphia	$407	$690	$315	$473	$475	$235	$298
2010	Frost Brown Todd	Cincinnati	$279	$515	$200	$326	$250	$150	$189
2010	Fulbright & Jaworski	Houston							
2010	Gardere Wynne Sewell	Dallas	$445	$815	$380	$531	$445	$195	$311
2010	Gibbons	Newark, NJ	$404	$790	$390	$479	$450	$250	$289
2010	Gibson, Dunn & Crutcher LLP	Los Angeles							
2010	Godfrey & Kahn	Milwaukee		$495	$325		$340	$180	
2010	Goodwin Procter	Boston							

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Gordon & Rees	San Francisco, CA							
2010	GrayRobinson	Orlando, FL		$750	$225		$315	$150	
2010	Greenberg Traurig	New York	$453	$875	$355	$550	$610	$200	$332
2010	Harris Beach	Rochester, NY		$500	$275		$250	$140	
2010	Haynes and Boone	Dallas							
2010	Hinshaw & Culbertson	Chicago							
2010	Hiscock & Barclay	Syracuse, NY	$311	$650	$195	$348	$440	$150	$234
2010	Hodgson Russ	Buffalo, NY	$328	$665	$230	$374	$410	$175	$238
2010	Hogan Lovells	Washington							
2010	Holland & Hart LLP	Washington							
2010	Holland & Knight	Washington	$418	$850	$300	$499	$480	$185	$288
2010	Holme Roberts & Owen	Denver	$355	$635	$285	$415	$530	$170	$295
2010	Honigman Miller Schwartz and Cohn	Detroit							
2010	Hughes Hubbard & Reed LLP	New York							
2010	Hunton & Williams	Richmond, VA							
2010	Husch Blackwell	St. Louis	$329	$804	$230	$357	$415	$171	$220
2010	Ice Miller LLP	Indianapolis							
2010	Irell & Manella	Los Angeles							
2010	Jackson Kelly	Charleston, WV		$495	$245		$275	$155	
2010	Jackson Lewis	White Plains, NY	$364	$715	$260	$428	$440	$150	$282
2010	Jones Day	Washington							
2010	Jones, Walker, Waechter, Poitevent, Carrare & Denegre	New Orleans		$620	$195		$275	$140	
2010	K&L Gates	Pittsburgh							
2010	Kelley Drye & Warren	New York		$900	$465		$565	$275	
2010	Kenyon & Kenyon LLP	New York							

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Kilpatrick Stockton	Atlanta	$425	$730	$375	$527	$465	$225	$320
2010	Kirkland & Ellis	Chicago							
2010	Knobbe, Martens, Olson & Bear	Irvine, CA	$432	$710	$395	$511	$450	$285	$332
2010	Kramer Levin Naftalis & Frankel	New York							
2010	Lane Powell	Seattle	$349	$600	$310	$431	$350	$230	$278
2010	Lathrop & Gage	Kansas City		$490	$255		$265	$160	
2010	LeClairRyan, Professional Corporation	Richmond, VA							
2010	Leonard, Street and Deinard	Minneapolis							
2010	Lewis and Roca	Phoenix, AZ							
2010	Lewis Brisbois Bisgaard & Smith	Los Angeles							
2010	Lewis, Rice & Fingersh	St. Louis		$460	$260		$315	$150	
2010	Lindquist & Vennum	Minneapolis	$330			$415			$235
2010	Littler Mendelson	San Francisco	$372	$650	$290	$445	$480	$210	$296
2010	Locke Lord Bissell & Liddell	Dallas	$486	$1,120	$400	$599	$525	$215	$320
2010	Loeb & Loeb	New York		$975	$475		$575	$275	
2010	Lowenstein Sandler	Roseland, NJ		$825	$440		$575	$235	
2010	Luce, Forward, Hamilton & Scripps	San Diego		$670	$350		$445	$245	
2010	Manatt, Phelps & Phillips	Los Angeles	$568	$850	$525	$651	$525	$200	$405
2010	Marshall, Dennehey, Warner, Coleman & Goggin	Philadelphia		$410	$145		$320	$130	
2010	Maynard, Cooper & Gale	Birmingham, AL		$600	$325		$295	$235	
2010	McAndrews, Held & Malloy	Chicago		$675	$260		$350	$225	

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	McCarter & English	Newark, NJ	$355	$825	$360	$498	$405	$215	$313
2010	McElroy, Deutsch, Mulvaney & Carpenter	Morristown, N.J.	$210	$550	$295	$280	$275	$150	$190
2010	McGuireWoods	Richmond, Va.	$455	$830	$325	$543	$600	$220	$355
2010	McKenna Long & Aldridge	Atlanta	$455	$775	$375	$540	$490	$220	$366
2010	Michael Best & Friedrich	Milwaukee	$346	$650	$235	$400	$320	$190	$239
2010	Miles & Stockbridge	Baltimore	$695	$695	$325		$370	$220	
2010	Miller & Martin	Chattanooga, TN	$328	$610	$235	$361	$275	$180	$218
2010	Miller, Canfield, Paddock and Stone	Detroit							
2010	Montgomery, McCracken, Walker & Rhoads	Philadelphia		$625	$380	$461	$395	$205	$284
2010	Moore & Van Allen	Charlotte N.C.	$364	$785	$265	$441	$360	$180	$257
2010	Morgan, Lewis & Bockius	Philadelphia							
2010	Morris, Manning & Martin	Atlanta	$424	$760	$425	$492	$545	$225	$353
2010	Morrison & Foerster	San Francisco, CA							
2010	Munger, Tolles & Olson	Los Angeles							
2010	Neal, Gerber & Eisenberg	Chicago							
2010	Nelson Mullins Riley & Scarborough	Columbia, SC	$347	$850	$245	$399	$335	$185	$248
2010	Nexsen Pruet	Columbia, SC		$525	$230		$250	$160	
2010	Nixon Peabody	New York	$429	$805	$375	$613	$580	$195	$388
2010	O'Melveny & Myers	Los Angeles							
2010	Ogletree, Deakins, Nash, Smoak & Stewart	Greenville, S.C.	$351	$575	$300	$389	$390	$195	$285

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Orrick, Herrington & Sutcliffe	San Francisco, CA							
2010	Parker Poe Adams & Bernstein LLP	Charlotte N.C.							
2010	Patton Boggs	Washington	$482	$990	$355	$645	$550	$215	$399
2010	Paul, Hastings, Janofsky & Walker	New York							
2010	Paul, Weiss, Rifkind Wharton & Garrison LLP	New York							
2010	Pepper Hamilton	Philadelphia	$326	$825	$420	$547	$465	$230	$329
2010	Perkins Coie	Seattle	$447	$825	$275	$534	$570	$200	$354
2010	Phelps Dunbar	New Orleans	$226	$385	$180	$272	$240	$145	$183
2010	Phillips Lytle	Buffalo, NY	$255	$535	$260	$352	$450	$150	$283
2010	Pillsbury Winthrop Shaw Pittman	New York							
2010	Polsinelli Shughart	Kansas City, MO		$600	$250		$325	$185	
2010	Quarles & Brady	Milwaukee	$364	$660	$290	$438	$400	$210	$260
2010	Reed Smith	Pittsburgh							
2010	Reinhart Boerner Van Deuren	Milwaukee							
2010	Roetzel & Andress	Akron, OH	$317	$525	$225	$357	$325	$165	$243
2010	Rutan & Tucker	Costa Mesa, CA		$650	$355		$450	$225	
2010	Saul Ewing	Philadelphia	$412	$800	$320	$491	$475	$225	$310
2010	Schiff Hardin LLP	Chicago							
2010	Schnader Harrison Segal & Lewis	Philadelphia							
2010	Schulte Roth & Zabel	New York		$895	$735		$690	$275	
2010	Schwabe, Williamson & Wyatt	Portland, OR	$360	$540	$310	$415	$450	$200	$260
2010	Sedgwick, Detert, Moran & Arnold	San Francisco							
2010	Seyfarth Shaw	Chicago	$377	$770	$335	$505	$535	$185	$325

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Sheppard Mullin	Los Angeles		$820	$495		$620	$270	
2010	Sherman & Howard	New York							
2010	Shook, Hardy & Bacon	Kansas City, MO							
2010	Shumaker, Loop & Kendrick	Toledo, OH	$331	$540	$250	$366	$315	$185	$246
2010	Skadden, Arps, Slate, Meagher & Flom	New York							
2010	Smith, Gambrell & Russell	Atlanta		$740	$325		$440	$195	
2010	Snell & Wilmer	Phoenix	$338	$795	$315	$486	$558	$175	$282
2010	Squire, Sanders & Dempsey	Cleveland							
2010	Steptoe & Johnson LLP	Washington							
2010	Stevens & Lee	Reading, PA							
2010	Stinson Morrison Hecker	Kansas City, MO							
2010	Stites & Harbison	Louisville, KY							
2010	Stoel Rives	Portland, OR	$381	$600	$315	$441	$390	$190	$270
2010	Strasburger & Price	Dallas	$336	$617	$250	$372	$306	$194	$243
2010	Sullivan & Worcester	Boston	$537	$830	$475	$647	$535	$290	$383
2010	Sutherland Asbill & Brennan	Atlanta							
2010	Taft, Stettinius & Hollister	Cincinnati	$315	$500	$220	$358	$365	$165	$227
2010	Thompson & Knight	Dallas		$825	$410		$440	$265	
2010	Thompson Coburn	St. Louis		$610	$300		$395	$190	
2010	Townsend and Townsend and Crew	San Francisco, CA	$320	$750	$470	$563	$460	$260	$345
2010	Troutman Sanders	Atlanta							
2010	Ulmer & Berne	Cleveland		$565	$260		$375	$185	
2010	Vedder Price	Chicago	$425	$720	$370	$483	$365	$255	$326
2010	Venable	Washington	$484	$950	$445	$590	$500	$280	$353

Fiscal Year	Firm Name	Location	Firmwide Average	Partner High	Partner Low	Partner Average	Associate High	Associate Low	Associate Average
2010	Vorys, Sater, Seymour and Pease	Columbus, OH							
2010	Wachtell, Lipton, Rosen & Katz	New York							
2010	Weil, Gotshal & Manges LLP	New York							
2010	White and Williams	Philadelphia							
2010	Wildman, Harrold, Allen & Dixon LLP	Chicago							
2010	Wiley Rein	Washington							
2010	Williams Mullen	Richmond, Va.	$368	$645	$315	$428	$370	$230	$279
2010	Willkie Farr & Gallagher LLP	New York							
2010	Wilmer Cutler Pickering Hale and Dorr	Washington							
2010	Winstead	Dallas	$395	$655	$340	$462	$390	$215	$291
2010	Winston & Strawn	Chicago	$486	$1,075	$475	$670	$610	$250	$393
2010	Womble Carlyle Sandridge & Rice	Winston Salem, NC	$372	$625	$300	$461	$445	$210	$291
2010	Wyatt, Tarrant & Combs	Louisville, KY		$500	$245		$285	$180	

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2010 NLJ Associate Class Billing Survey

Fiscal Year	Firm Name	Associate Class							
		1st year	*2nd year*	*3rd year*	*4th year*	*5th year*	*6th year*	*7th year*	*8th year*
2010	Alston & Bird	$270 - $345	$330 - $395	$365 - $440	$395 - $470	$420 - $515	$445 - $550	$470 - $570	
2010	Benesch, Friedlander, Coplan	$195	$200	$215	$230	$240	$250	$275	
2010	Blank Rome	$250 - $275	$260 - $290	$280 - $305	$325 - $360	$345 - $400	$370 - $435	$390 - $460	$410 - $480
2010	Brinks Hofer Gilson & Lione	$240	$265	$285	$310	$340	$365	$390	$410
2010	Brownstein Hyatt Farber Schreck	$200							
2010	Bryan Cave	$185 - $300	$215 - $350	$250 - $385	$275 - $395	$300 - $420	$275 - $460	$330 - $480	$340 - $510
2010	Curtis, Mallet-Prevost, Colt &	$290	$335	$375	$415	$455	$495	$535	$575
2010	Davis Wright Tremaine	$190 - $285	$205 - $295	$225 - $325	$235 - $345	$245 - $365	$265 - $380	$285 - $405	$295 - $415
2010	Dickinson Wright	$190	$195	$205	$220	$230	$240	$250	
2010	Dickstein Shapiro	$265 - $290	$325 - $375	$375 - $425	$375 - $425	$425 - $475	$425 - $475	$475 - $530	$475 - $530
2010	Dinsmore & Shohl	$180	$190	$205	$220	$230	$240	$250	260
2010	Edwards Angell Palmer & Dodge	255	275						
2010	Fitzpatrick, Cella, Harper & Scinto	$275	$300	$325	$350	$370	$385	$405	$420

Associate Class

Year	Firm Name	1st year	2nd year	3rd year	4th year	5th year	6th year	7th year	8th year
2010	Frost Brown Todd	$150							
2010	Gardere Wynne Sewell	195	210	260	260	300	315	355	385
2010	Harris Beach	$155	$170	$200	$230	$230	$230	$250	$250
2010	Hiscock & Barclay	$150 - $340	$150-340	$165 - $360	$165 - $360	$165 - $360	$175 - $380	$175 - $380	$165 - $440
2010	Kelley Drye & Warren	$305	$340	$370	$410	$435	$455	$485	510
2010	Kilpatrick Stockton	250	275	310	325	335	360	375	385
2010	Knobbe Martens Olson & Bear	$285	$310	$335	$360	$385			
2010	Lindquist & Vennum	$200	$210	225	235	245	260	265	290
2010	Locke Lord Bissell & Liddell	$215	$230	$253	$270	$300	$321	$349	$386
2010	Loeb & Loeb	$350 - $375							
2010	Maynard, Cooper & Gale	$235	$235	$245	$255	$270	$280	$295	
2010	McElroy, Deutsch, Mulvaney &	$150	$175	$185	$195	$200	$205	$210	$220
2010	McKenna Long & Aldridge	279	312	325	346	363	381	382	415
2010	Montgomery, McCracken, Walker	$205	$215	$235	$255	$275	$295	$315	$335
2010	Morris, Manning & Martin	$200	$265	$310	$340	$365	$390	$415	$425

Associate Class

Year	Firm Name	1st year	2nd year	3rd year	4th year	5th year	6th year	7th year	8th year
2010	Frost Brown Todd	$150							
2010	Gardere Wynne Sewell	195	210	260	280	300	315	355	385
2010	Harris Beach	$155	$170	$200	$230	$230	$230	$250	$250
2010	Hiscock & Barclay	$150 - $340	$150-340	$165 - $360	$165 - $360	$165 - $360	$175 - $380	$175 - $360	$185 - $440
2010	Kelley Drye & Warren	$305	$340	$370	$410	$435	$455	$485	510
2010	Kilpatrick Stockton	250	275	310	325	335	360	375	385
2010	Knobbe Martens Olson & Bear	$285	$310	$335	$360	$385			
2010	Lindquist & Vennum	$200	$210	225	235	245	260	265	290
2010	Locke Lord Bissell & Liddell	$215	$230	$253	$270	$300	$321	$349	$386
2010	Loeb & Loeb	$350 - $375							
2010	Maynard, Cooper & Gale	$235	$235	$245	$255	$270	$280	$295	
2010	McElroy, Deutsch, Mulvaney &	$150	$175	$185	$195	$200	$205	$210	$220
2010	McKenna Long & Aldridge	279	312	326	346	363	381	382	415
2010	Montgomery, McCracken, Walker	$205	$215	$235	$255	$275	$295	$315	$335
2010	Morris, Manning & Martin	$200	$265	$310	$340	$365	$390	$415	$425

Fiscal Year	Firm Name	Associate Class							
		1st year	2nd year	3rd year	4th year	5th year	6th year	7th year	8th year
2010	Patton Boggs	$290	$315	$340	$370	$400	$425	$450	$480
2010	Pepper Hamilton	$230	$275	$300	$330	$355	$370	$385	$395
2010	Perkins Coie	272	290	386	337	345	372	391	436
2010	Phillips Lytle	$160	$170	$190	$195	$210	$225	$220	235
2010	Quarles & Brady	$210 - $235	$220 - $240						
2010	Saul Ewing	$225 - $235	$230 - $260	$255 - $275	$240 - $315	$260 - $285	$285 - $300	$295 - $425	$275 - $320
2010	Schulte Roth & Zabel	$375	$445	$495	$540	$560	$580	$605	$625
2010	Schwabe, Williamson & Wyatt	$200							
2010	Sheppard, Mullin, Richter & Hampton	$270 - $335	$330 - $430	$365 - $475	$395 - $510	$420 - $540	$445 - $565	$470 - $595	$490 - $620
2010	Snell & Wilmer	$185	$200	$225	$260	$285	$315	$350	$365
2010	Strasburger & Price	$200	$220	$240	$260	$280	$300	$320	$340
2010	Sullivan & Worcester	$290	$305	$330	$350	$370	$390	$425	
2010	Thompson & Knight	$265	$300	$330	$365	$385	$405	$425	$440
2010	Townsend and Townsend and Crew	260	290	325	370	390	420	450	460
2010	Vedder Price	225	270	290	310	325	345	360	380

Fiscal Year	Firm Name	Associate Class						
		1st year	*2nd year*	*3rd year*	*4th year*	*5th year*	*6th year*	*7th year*	*8th year*
2010	Williams Mullen	$230	$250	$265	$295	$295	$310	$345	$345
2010	Winstead	$215	215	227	260	280	300	325	350
2010	Winston & Strawn	$295 - $320	$305 - $335	$325 - $365	$350 - $400	$380 - $440	$420 - $480	$455 - $520	$490 - $555

EXHIBIT H

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Bankruptcy Rates Top $1,000 Mark in 2008-09

Amy Kolz
The American Lawyer
December 16, 2009

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A review of bankruptcy rates in Delaware and the Southern District of New York shows that a handful of U.S.-based partners at **Am Law 200** firms have inched above the $1,000 rate barrier, making bankruptcy work as lucrative as it was plentiful in 2008 and 2009. Over a 12-month period ending August 2009, there were more than 13,000 billing rate entries submitted by law firms in the nation's two busiest bankruptcy courts, according to a new database compiled by ALM Media.

Among U.S.-based lawyers at Am Law 200 firms, **Shearman & Sterling** tax partner Bernie Pistilio topped the rate chart with an hourly fee of $1,065 for his work on the bankruptcy of Stock Building Supply Holdings LLC, a building products supplier, in Delaware. (One solo practitioner in Pleasantville, N.Y., Alan Harris, surpassed Pistilio's rate, charging $1,200 an hour for his work as special real estate litigation counsel on the bankruptcy of Digital Printing Systems in the Southern District of New York.) Eleven other U.S.-based Am Law 200 partners were in the $1,000-plus club, according to the database. **Cadwalader, Wickersham & Taft** financial restructuring co-chair Deryck Palmer, a former **Weil, Gotshal & Manges** partner, billed Lyondell Chemical Co. at a rate of $1,050 for work on its 2009 bankruptcy. **Greenberg Traurig** bankruptcy co-chair Bruce Zirinsky, who left Cadwalader last January, billed $1,050 an hour as debtor's counsel for TH Agriculture and Nutrition LLC, as did **White & Case** global restructuring head Thomas Lauria for WCI Communities Inc., and Robert Pincus, the head of the corporate practice in **Skadden, Arps, Slate, Meagher & Flom's** Wilmington office, for Hayes Lemmerz International Inc., an automotive wheel supplier.

Neal Stoll, a Skadden antitrust partner, and Sally Thurston, a Skadden tax partner, billed $1,035 for work on the bankruptcies of VeraSun Energy Corp. and Hayes Lemmerz, respectively, while **Latham & Watkins** corporate finance chair Kirk Davenport billed at $1,025 an hour for Dayton Superior Corp.'s filing. **Paul, Weiss, Rifkind, Wharton & Garrison** partners Carl Reisner and Richard Bronstein billed at $1,025 for the Buffets Inc., bankruptcy. (Reisner is co-head of the firm's M&A practice and Bronstein is co-chair of its tax practice.) **Simpson Thacher & Bartlett** partners Lee Meyerson and litigator Michael Chepiga charged Lehman Brothers $1,000 an hour on the sale of its brokerage to Barclays Bank PLC.

Absent from the $1,000 club are Weil, Gotshal & Manges restructuring gurus Harvey Miller and Marcia Goldstein. Both clocked rates of $950 an hour for their work on the Lehman Brothers and BearingPoint Inc. bankruptcies, respectively. Also, **Kirkland & Ellis'** James Sprayregen billed $965 an hour for work on the bankruptcies of Lear Corp. and The Reader's Digest Association. And **Jones Day** partner Corinne Ball charged $900 an hour for her work on Chrysler's filing.

Comparing the median partner rates among Am Law 200 firms in the database demonstrated that there are few bargains when it comes to Chapter 11 work. Among those charging median partner rates of more than $900 an hour were: Cadwalader; Cleary Gottlieb Steen & Hamilton; Davis Polk & Wardwell; Milbank, Tweed, Hadley & McCloy; Paul Weiss; Shearman & Sterling; Simpson Thacher; and Skadden. Firms with median partner billing rates between $800 and $900 were Gibson Dunn, Fried Frank, Latham, Paul Hastings, Weil Gotshal, and White & Case. Firms billing $700 or below were Akin Gump Strauss Hauer & Feld, Kirkland, Sidley Austin, and Sonnenschein Nath & Rosenthal. (Medians can be deceiving, since some firms, such as Kirkland, had a difference of more than $500 between its highest- and lowest-rate partners.)

The bankruptcy case with one of the highest median partner rates was Nortel Networks. The phone equipment maker paid firms such as Cleary and Kirkland a median partner rate of $940. Firms working on the Lehman filing billed a median partner rate of $810 during the time period, while firms working on the filing of Tribune Co. billed a median of $690, according to the database.

Associate rates occasionally topped $700 an hour on bankruptcies including Lehman and Nortel Networks, as well as that of the lesser-known Sportsman's Warehouse. Discovery attorneys, research specialists and benefits consultants sometimes billed between $500 and $600 on cases such as Nortel, Charter Communications and Graphics Properties Holdings Inc.

FIRM	MEDIAN PARTNER RATE*	# PARTNERS FILING
Simpson Thacher	$980	30
Cleary Gottlieb	$960	47
Shearman & Sterling	$950	17
Davis Polk	$948	14
Skadden	$945	38
Paul Weiss	$925	24
Cadwalader	$900	29
Milbank	$900	55
Weil Gotshal	$843	142
Gibson Dunn	$840	29
Fried Frank	$83	518
Latham & Watkins	$830	57
White & Case	$825	21
Paul Hastings	$810	46
Sidley Austin	$700	99
Akin Gump	$690	79

Kirkland	$675	149
Sonnenschein	$625	47

*U.S.-based partners only.

The American Lawyer will publish a detailed analysis of the bankruptcy billing rates in its February 2010 issue.

Click here to order the Excel® version of the 2009 Bankruptcy Billing Rates Report.

This article first appeared on The Am Law Daily blog on AmericanLawyer.com.

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EXHIBIT I

$1,000 Per Hour Isn't Rare Anymore; Nominal billing levels rise, but discounts ease blow. The National Law Journal January 13, 2014 Monday

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HEADLINE: $1,000 Per Hour **Isn't Rare Anymore**;
Nominal billing levels rise, but discounts ease blow.

BYLINE: KAREN SLOAN

BODY:

As recently as five years ago, law partners charging $1,000 an hour were outliers. Today, four-figure hourly rates for indemand partners at the most prestigious firms don't raise eyebrows-and a few top earners are closing in on $2,000 an hour.

These rate increases come despite hand-wringing over price pressures from clients amid a tough economy. But everrising standard billing rates also obscure the growing practice of discounts, falling collection rates, and slow march toward alternative fee arrangements.

Nearly 20 percent of the firms included in The National Law Journal's annual survey of large law firm billing rates this year had at least one partner charging more than $1,000 an hour. Gibson, Dunn & Crutcher partner Theodore Olson had the highest rate recorded in our survey, billing $1,800 per hour while representing mobile satellite service provider LightSquared Inc. in Chapter 11 proceedings.

Of course, few law firm partners claim Olson's star power. His rate in that case is nearly the twice the $980 per hour average charged by Gibson Dunn partners and three times the average $604 hourly rate among partners at NLJ 350 firms. Gibson Dunn chairman and managing partner Ken Doran said Olson's rate is "substantially" above that of other partners at the firm, and that the firm's standard rates are in line with its peers.

"While the majority of Ted Olson's work is done under alternative billing arrangements, his hourly rate reflects his stature in the legal community, the high demand for his services and the unique value that he offers to clients given his extraordinary experience as a former solicitor general of the United States who has argued more than 60 cases before the U.S. Supreme Court and has counseled several presidents," Doran said.

In reviewing billing data this year, we took a new approach, asking each firm on the NLJ 350-our survey of the nation's 350 largest firms by attorney headcount-to provide their highest, lowest and average billing rates for associates and partners. We supplemented those data through public records. All together, this year's survey includes information for 159 of the country's largest law firms and reflects billing rates as of October.

The figures show that, even in a down economy, hiring a large law firm remains a pricey prospect. The median among the highest partner billing rates reported at each firm is $775 an hour, while the median low partner rate is $405. For associates, the median high stands at $510 and the low at $235. The average associate rate is $370.

Multiple industry studies show that law firm billing rates continued to climb during 2013 despite efforts by corporate counsel to rein them in. TyMetrix's 2013 Real Rate Report Snapshot found that the average law firm billing rate increased by 4.8 percent compared with 2012. Similarly, the Center for the Study of the Legal Profession at the Georgetown University Law Center and Thomson Reuters Peer Monitor found that law firms increased their rates by an average 3.5 percent during 2013.

Of course, rates charged by firms on paper don't necessarily reflect what clients actually pay. Billing realization rates-which reflect the percentage of work billed at firms' standard rates- have fallen from 89 percent in 2010 to nearly 87 percent in 2013 on average, according to the Georgetown study. When accounting for billed hours actually collected by firms, the realization rate falls to 83.5 percent.

"What this means, of course, is that- on average-law firms are collecting only 83.5 cents for every $1.00 of standard time they record," the Georgetown report reads. "To understand the full impact, one need only consider that at the end of 2007, the collected realization rate was at the 92 percent level."

In other words, law firms set rates with the understanding that they aren't likely to collect the full amount, said Mark Medice, who oversees the Peer Monitor Index. That index gauges the strength of the legal market according to economic indicators including demand for legal services, productivity, rates and expenses. "Firms start out with the idea of, 'I want to achieve a certain rate, but it's likely that my client will ask for discounts whether or not I increase my rate,'" Medice said.

Indeed, firms bill nearly all hourly work at discounts ranging from 5 percent to 20 percent off standard rates, said Peter Zeughauser, a consultant with the Zeughauser Group. Discounts can run as high as 50 percent for matters billed under a hybrid system, wherein a law firm can earn a premium for keeping costs under a set level or for obtaining a certain outcome, he added. "Most firms have gone to a two-tier system, with what is essentially an aspirational rate that they occasionally get and a lower rate that they actually budget for," he said.

Most of the discounting happens at the front end, when firms and clients negotiate rates, Medice said. But additional discounting happens at the billing and collections stages. Handling alternative fee arrangements and discounts has become so complex that more than half of the law firms on the Am Law 100-NLJ affiliate The American Lawyer's ranking of firms by gross revenue-have created new positions for pricing directors, Zeughauser said.

THE ROLE OF GEOGRAPHY

Unsurprisingly, rates vary by location. Firms with their largest office in New York had the highest average partner and associate billing rates, at $882 and $520, respectively. Similarly, TyMetrix has reported that more than 25 percent of partners at large New York firms charge $1,000 per

hour or more for contracts and commercial work.

Washington was the next priciest city on our survey, with partners charging an average $748 and associates $429. Partners charge an average $691 in Chicago and associates $427. In Los Angeles, partners charge an average $665 while the average associate rate is $401.

Pricing also depends heavily on practice area, Zeughauser and Medice said. Bet-the-company patent litigation and white-collar litigation largely remain at premium prices, while practices including labor and employment have come under huge pressure to reduce prices.

"If there was a way for law firms to hold rates, they would do it. They recognize how sensitive clients are to price increases," Zeughauser said. But declining profit margins-due in part to higher technology costs and the expensive lateral hiring market-mean that firms simply lack the option to keep rates flat, he said.

BILLING SURVEY METHODOLOGY

The National Law Journal's survey of billing rates of the largest U.S. law firms provides the high, low and average rates for partners and associates.

The NLJ asked respondents to its annual survey of the nation's largest law firms (the NLJ 350) to provide a range of hourly billing rates for partners and associates as of October 2013.

For firms that did not supply data to us, in many cases we were able to supplement billing-rate data derived from public records.

In total, we have rates for 159 of the nation's 350 largest firms.

Rates data include averages, highs and low rates for partners and associates. Information also includes the average full-time equivalent (FTE) attorneys at the firm and the city of the firm's principal or largest office.

We used these data to calculate averages for the nation as a whole and for selected cities.

Billing Rates at the Country's Priciest Law Firms

Here are the 50 firms that charge the highest average hourly rates for partners.

Billing Rates at the Country's Priciest Law Firms

FIRM NAME	LARGEST U.S. OFFICE*	AVERAGE FULL-TIME EQUIVALENT ATTORNEYS*	PARTNER HOURLY RATES			ASSOCIATE HOURLY RATES		
			AVERAGE	HIGH	LOW	AVERAGE	HIGH	LOW
* Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013. For complete numbers, please see NLJ.com.								
** Firm did not exist in this form for the entire year.								
Debevoise & Plimpton	New York	615	$1,055	$1,075	$955	$490	$760	$120
Paul, Weiss,	New York	803	$1,040	$1,120	$760	$600	$760	$250

Rifkind, Wharton & Garrison								
Skadden, Arps, Slate, Meagher & Flom	New York	1,735	$1,035	$1,150	$845	$620	$845	$340
Fried, Frank, Harris, Shriver & Jacobson	New York	476	$1,000	$1,100	$930	$595	$760	$375
Latham & Watkins	New York	2,033	$990	$1,110	$895	$605	$725	$465
Gibson, Dunn & Crutcher	New York	1,086	$980	$1,800	$765	$590	$930	$175
Davis Polk & Wardwell	New York	787	$975	$985	$850	$615	$975	$130
Willkie Farr & Gallagher	New York	540	$950	$1,090	$790	$580	$790	$350
Cadwalader, Wickersham & Taft	New York	435	$930	$1,050	$800	$605	$750	$395
Weil, Gotshal & Manges	New York	1,201	$930	$1,075	$625	$600	$790	$300
Quinn Emanuel Urquhart & Sullivan	New York	697	$915	$1,075	$810	$410	$675	$320
Wilmer Cutler Pickering Hale and Dorr	Washington	961	$905	$1,250	$735	$290	$695	$75
Dechert	New York	803	$900	$1,095	$670	$530	$735	$395
Andrews Kurth	Houston	348	$890	$1,090	$745	$528	$785	$265
Hughes Hubbard & Reed	New York	344	$890	$995	$725	$555	$675	$365
Irell & Manella	Los Angeles	164	$890	$975	$800	$535	$750	$395
Proskauer Rose	New York	746	$880	$950	$725	$465	$675	$295
White & Case	New York	1,900	$875	$1,050	$700	$525	$1,050	$220
Morrison & Foerster	San Francisco	1,010	$865	$1,195	$595	$525	$725	$230
Pillsbury Winthrop Shaw Pittman	Washington	609	$865	$1,070	$615	$520	$860	$375
Kaye Scholer	New York	414	$860	$1,080	$715	$510	$680	$320
Kramer Levin Naftalis & Frankel	New York	320	$845	$1,025	$740	$590	$750	$400
Hogan Lovells	Washington	2,280	$835	$1,000	$705	-	-	-

Kasowitz, Benson, Torres & Friedman	New York	365	$835	$1,195	$600	$340	$625	$200
Kirkland & Ellis	Chicago	1,517	$825	$995	$590	$540	$715	$235
Cooley	Palo Alto	632	$820	$990	$660	$525	$630	$160
Arnold & Porter	Washington	748	$815	$950	$670	$500	$610	$345
Paul Hastings	New York	899	$815	$900	$750	$540	$755	$335
Curtis, Mallet-Prevost, Colt & Mosle	New York	322	$800	$860	$730	$480	$785	$345
Winston & Strawn	Chicago	842	$800	$995	$650	$520	$590	$425
Bingham McCutchen	Boston	900	$795	$1,080	$220	$450	$605	$185
Akin Gump Strauss Hauer & Feld	Washington	806	$785	$1,220	$615	$525	$660	$365
Covington & Burling	Washington	738	$780	$890	$605	$415	$565	$320
King & Spalding	Atlanta	838	$775	$995	$545	$460	$735	$125
Norton Rose Fulbright	N/A**	N/A**	$775	$900	$525	$400	$515	$300
DLA Piper	New York	4,036	$765	$1,025	$450	$510	$750	$250
Bracewell & Giuliani	Houston	432	$760	$1,125	$575	$440	$700	$275
Baker & McKenzie	Chicago	4,004	$755	$1,130	$260	$395	$925	$100
Dickstein Shapiro	Washington	308	$750	$1,250	$590	$475	$585	$310
Jenner & Block	Chicago	432	$745	$925	$565	$465	$550	$380
Jones Day	New York	2,363	$745	$975	$445	$435	$775	$205
Manatt, Phelps & Phillips	Los Angeles	325	$740	$795	$640	-	-	-
Seward & Kissel	New York	152	$735	$850	$625	$400	$600	$290
O'Melveny & Myers	Los Angeles	738	$715	$950	$615	-	-	-
McDermott Will & Emery	Chicago	1,024	$710	$835	$525	-	-	-
Reed Smith	Pittsburgh	1,468	$710	$945	$545	$420	$530	$295
Dentons	N/A**	N/A**	$700	$1,050	$345	$425	$685	$210
Jeffer Mangels Butler & Mitchell	Los Angeles	126	$690	$875	$560	-	-	-
Sheppard,	Los	521	$685	$875	$490	$415	$535	$275

Mullin, Richter & Hampton	Angeles							
Alston & Bird	Atlanta	805	$675	$875	$495	$425	$575	$280

THE FOUR-FIGURE CLUB

These 10 firms posted the highest partner billing rates.

THE FOUR-FIGURE CLUB	
Gibson, Dunn & Crutcher	$1,800
Dickstein Shapiro	$1,250
Wilmer Cutler Pickering Hale and Dorr	$1,250
Akin Gump Strauss Hauer & Feld	$1,220
Kasowitz, Benson, Torres & Friedman	$1,195
Morrison & Foerster	$1,195
Skadden, Arps, Slate, Meagher & Flom	$1,150
Baker & McKenzie	$1,130
Bracewell & Giuliani	$1,125
Paul, Weiss, Rifkind, Wharton & Garrison	$1,120

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