

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION**

JORGE OSWALDO AQUINO MARTINEZ,
ELVIS NAHUM CRUZ VASQUEZ, HEBER
ALFONSO ZAPATA CONTRERAS,
ISIDRO ARELLANO CHIHUAHUA,
JOSE MARIA RAMIREZ MORALES,
LUIS ADRIAN SALAZAR LOZANO,
VERONICA OLAN CASTILLO, and
AARON HERNAN PEREZ SALAZAR,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

MOBIS ALABAMA, LLC d/b/a HYUNDAI
MOBIS; KIA GEORGIA, INC.; GB2G, INC.
d/b/a ALLSWELL; SPJ CONNECT, INC.;
YOUNGJIN LEE, individually; JOB
KNOWLEDGE, LLC; and TOTAL
EMPLOYEE SOLUTION SUPPORT, LLC,

Defendants.

Civil Action No.
3:22-cv-00145-LMM

DECLARATION OF BRIAN J. SUTHERLAND

My name is Brian J. Sutherland. I am one of the attorneys representing the Plaintiffs in this matter. I am over 18 years of age and make this Declaration freely and voluntarily and based on my personal knowledge of the facts set forth herein.

1. I am an attorney and partner with the law firm Beal, Sutherland Berlin & Brown, LLC (“BSBB”), located at Resurgens Plaza, 945 East Paces Ferry Rd NE, Suite 2275, in Atlanta, Georgia 30345. I am one of the class counsel in this case.

Time and Resources Expended on the Case

2. This Declaration sets forth the time and expenses to date expended by BSBB in this case and provides information about the experience of our firm’s lawyers.

Beal Sutherland Berlin & Brown

3. In my law firm, work has been performed on this case by myself and my partner Rachel Berlin Benjamin, and our paralegal Max Lavinthal. Our firm tries not to duplicate efforts to be efficient and because the firm takes matters on a contingency basis.

4. To date, we have spent a total of 479.70 hours having a value of \$280,477.50 from January 2, 2023 through the present, calculated at our current customary hourly rates for this type of matter. We will also be traveling to and attending the fairness hearing on May 29, 2026. The amount of time recorded by each lawyer and their billing rates are as follows:

Timekeeper	Position/Year Started Practice	Rate	Hours	Total
Sutherland, Brian	Partner/2006	\$600.00	233.9	\$140,330.00
Benjamin, Rachel	Partner/2010	\$575.00	243.3	\$139,897.50
Lavinthal, Max	Paralegal	\$100.00	2.5	\$250.00

5. The time I spent on this matter in my current law firm included almost all aspects of the case, including but not limited to reviewing the motions to dismiss filed by the several Defendants, conferencing with co-counsel members regarding the issues raised, conducting substantial legal research and drafting major portions of Plaintiffs' responses in opposition to the motions to dismiss, reviewing and responding to email from co-counsel, conferencing with co-counsel regarding documents necessary for mediation, preparation of demand correspondence and mediation statements, and participating in the mediation over two full days as well as subsequent finalization of papers.

6. Rachel Berlin Benjamin also spent substantial time on this matter in our current law firm, including but not limited to reviewing the several motions to dismiss, conducting substantial legal research and drafting major portions of Plaintiffs' responses to the same, communicating with clients and reviewing

their documents, communicating with opposing counsel and the mediator, preparing for and attending mediation, and reviewing drafts of filings.

7. Max Lavinthall only assisted with the drafting of a single joint motion in the case.

8. I believe the rates set forth above are reasonable and commensurate with, if not lower than, rates charged by lawyers in the Northern District of Georgia for similar types of complex class action matters.

9. Mrs. Benjamin and I kept contemporaneous time records in Clio and audited the records to avoid duplication of efforts or unreasonable entries. All of our time records are attached as Exhibit A. We did not charge for all the work we performed and exercised billing judgment by not billing for many emails and phone calls, and for quick reviews of court orders and docket entries. Time entries are omitted for many emails, short meetings or discussions about the case, and review of court orders and court filings.

10. Due to the substantial time commitment and risks inherent in class action litigation, BSBB declined other opportunities to generate attorney's fees and profits in other matters. Given the substantial time and effort needed for cases like this one, BSBB would not have participated in this representation but for the opportunity for a multiplier.

11. BSBB has expended reasonable costs in these matters of \$587.50. The expenses are attached as Exhibit B include expenses for translator services (invoices for \$250.00 and \$187.50) and the advance of a *pro hac vice* petition fee for co-counsel Centro de los Derechos del Migrante, Inc. (\$587.50).

The Experience of the Lawyers at Beal, Sutherland, Berlin & Brown

12. I graduated from the University of Washington at Seattle *cum laude* with a B.A. in 2003. I received my J.D. degree *summa cum laude* from Seattle University School of Law in 2006. I was also a Research and Technical Editor for the Seattle University Law Review, in which my student comment was published in the year of my graduation. *See* Brian J. Sutherland, *Killing Jim Crow and Undead Nondelegation Doctrine*, 29 SEATTLE U. L. REV. 917 (2006) (cited in *Moore v. Tangipahoa Parish Sch. Bd.*, No. 65-15556, 2008 WL 1930501 (E.D. La. Apr. 30, 2008)).

13. I was admitted to practice in Washington State in 2006 and was admitted to practice in Georgia in 2008. I am admitted in good standing and have never been the subject of any disciplinary proceeding. I am also a member of the Georgia Chapter of the National Employment Lawyers Association and have served as a moderator or presenter at seminars for which continuing legal education credit was granted by the Georgia Bar Association for my presentation

and prepared materials. I have also published other legal scholarship, including *Voting Rights Rollback: The Effect of Buckhannon on the Private Enforcement of Voting Rights*, 30 N.C. CENT. L. REV. 267 (2008), and *The Patchwork of State and Federal Language Assistance for Minority Voters and a Proposal for Model State Legislation*, 65 N.Y.U. ANN. SURV. AM. L. 323 (2009). I am also the co-author of a practice handbook entitled *Georgia Employment Law*, published in 2019 and 2020 by ALM Media Properties, a Division of ALM Media, LLC.

14. I first practiced law in 2006 under Mr. Joaquin G. Avila, Esq., a nationally renowned voting rights expert who won victories on behalf of plaintiffs in voting rights cases before the Supreme Court of the United States in *Lopez v. Monterey County*, 519 U.S. 9 (1996), and *Lopez v. Monterey County*, 525 U.S. 266 (1999). Thereafter, I served as a Staff Attorney for the national office of the American Civil Liberties Union Foundation in Atlanta, Georgia, from 2007 through 2009, and participated in successful voting rights litigation against the State of Alaska in *Nick v. Bethel*, No. 3:07-CV-0098 (D. Ala. 2008) and the State of Georgia in *Morales v. Handel*, No. 1:08-CV-3172 (N.D. Ga. 2008).

15. I began practicing employment law in 2009 as a Trial Attorney for the United States Equal Employment Opportunity Commission in that agency's Miami District Office in Miami, Florida. I served in that capacity until 2012,

handling cases involving federal anti-discrimination statutes, including cases involving large groups of similarly situated victims of employment discrimination. In March 2012, I returned to Atlanta as an associate for the law firm then known as Buckley & Klein, LLP. Buckley & Klein, LLP provided trial, litigation, arbitration, and mediation services related to labor and employment matters. In February of 2013 the firm was renamed The Buckley Law Firm, LLC. In 2015, our firm merged with The Beal Law Group to form Buckley Beal, LLP. I was named a partner of Buckley Beal, LLP in October of 2015.

16. From 2020 to 2022, I served as an Assistant Attorney General in the Civil Rights Division of the Washington State Attorney General's Office. In this position, I participated in complex federal litigation against the federal government under the Administrative Procedures Act and other matters, such as a 2021 lawsuit which sought relief for thousands of individuals who were subjected to immigration sweeps on passenger buses and resulted in a consent decree providing restitution.

17. In February 2023, my partners Rachel Berlin Benjamin, Drew Beal, Milinda Brown, and I started the law firm Beal, Sutherland, Berlin & Brown. Our firm focuses on complex litigation.

18. I have practiced law for almost 20 years, with most of it concentrated in employment law. I currently maintain an active federal litigation

practice which is focused primarily on employment law and civil rights cases. Over the years, I have represented well over three hundred individuals in a variety of employment-related disputes, including claims for discrimination based on race, gender, national origin, and religion under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e et seq., claims for disability discrimination and failure to accommodate in violation of the Americans with Disabilities Act, as amended, 42 U.S.C. §§ 12101 et seq., claims for age discrimination in violation of the Age Discrimination in Employment Act of 1967, 29 U.S.C. §§ 621 et seq., I have also represented numerous individuals in matters involving retaliation claims under these and other statutes, including the Georgia Whistleblower Act, O.C.G.A. § 45-1-4, and the federal False Claims Act, 31 U.S.C. §§ 3729 et seq. I have also handled cases under involving claims for wage and hour violations under the Fair Labor Standards Act, sexual harassment and other tort claims, and contract matters. I have tried three cases to verdict in Georgia, including two in this Court. I have also successfully represented clients on appeal to the United States Court of Appeals for the Eleventh Circuit. *See Thaxton-Brooks v. Baker*, 647 Fed. App'x. 996 (11th Cir. 2016); *Batson v. Salvation Army*, 897 F.3d 1320 (11th Cir. 2018); *Lewis v. City of Union City, Ga.*, 918 F.3d 1213 (11th Cir. 2019) (en banc).

19. I was also lead counsel for the successful named plaintiff in *Bostock v. Clayton County, Georgia*, 590 U.S. 644 (2020), a landmark U.S. Supreme Court decision which held that workplace discrimination on the basis of sexual orientation and gender identity violates Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e *et seq.*

20. For clients who pay for my services on an hourly basis, I charge and receive \$600 per hour.

21. Rachel Berlin Benjamin has 17 years of experience as a practicing attorney, with most of it focused on employment law. She is a partner at BSBB and worked extensively on every phase of this case. Mrs. Benjamin graduated from Sarah Lawrence College in 2006 with a Bachelor of Arts. She graduated *magna cum laude* from Pace Law School in 2009. After law school, Mrs. Benjamin served as an Assistant District Attorney in the Bronx County District Attorney's Office in New York for a little over three years where she presented felony cases to grand jury panels involving complex DNA evidence, conducted hearings and trials. She then transitioned to private practice at the law firm Klafter Olsen & Lesser from January 2013 through April 2014. In this role, she represented employees across numerous industries in complex litigation involving class and collective action matters, including cases under the Fair Labor Standards Act and Rule 23 class actions.

22. Mrs. Benjamin worked at the Buckley Law Firm from May 2014 through its change to Buckley Beal and thereafter until 2022. She started as an associate but was promoted to a partner about two years later, and then was promoted again to a Senior Partner in January 2021. During her time at Buckley Beal, she again represented employees in complex FLSA collective actions, as well as single plaintiff employment discrimination and retaliation cases, and hourly matters.

23. Our firm's law practice generally involves representation of employees, but that does not mean that all of our work is done on a contingent fee basis. Mrs. Benjamin and I both provide consultation and representation to individuals who compensate us on an hourly basis, either at our full rate or a reduced hourly rate with a smaller contingency percentages. Both of our normal and customary hourly rates is \$600. We have charged these rates to clients in Georgia, Washington State, and New York, and in order to work on this case, we set other business aside.

24. Our experience with individuals seeking representation in employment discrimination and retaliation cases demonstrates that those individuals face substantial difficulty securing competent counsel and would be unable to do so, in part, due to their lack of financial resources, without a contingent fee agreement. In this case our fee agreement is a contingent fee agreement.

25. All of the time our firm billed was, in our judgment, necessary to provide proper representation to Plaintiffs. The time was recorded at the time services were rendered and input into our timekeeping and case management software, Clio, which maintains those records for our firm. Mrs. Benjamin carefully reviewed all the time we billed in this firm and removed any which, in her billing judgment, was not necessary or was duplicative. The time we spent on the case as requested in this Declaration was necessary to prosecute this case.

26. In my opinion, the rates charged for each lawyer and the amount of time spent by our firm was reasonable and customary for the various specific tasks and was reasonable and customary for the complexity of the issues involved in this litigation.

27. I declare under penalty of perjury under the laws of the United States, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct and based on my knowledge, information, and belief, as well as my review of the aforementioned documents.

Dated: April 28, 2026

**BEAL, SUTHERLAND,
BERLIN, & BROWN, LLC**

/s/ Brian J. Sutherland

Brian J. Sutherland

Georgia Bar No. 105408

Resurgens Plaza
945 East Paces Ferry Rd NE
Suite 2275
Atlanta, Georgia 30326

Date	Hours	Description	Rate (\$)	Billable (\$)	User
1/2/23	0.5	email from Evan Gibbs re extension of time and pages to object to R&R. Emails among team re response to same. Draft and send respond to Evan.	575	\$287.50	Rachel Berlin
1/2/23	0.2	emails with team re [REDACTED]	575	\$115.00	Rachel Berlin
2/5/23	3.2	Review of Allswell/SPJ brief in support of MTD and Mobis brief in support of MTD; drafted email memorandum to team members re: same	600	\$1,920.00	Brian Sutherland
2/6/23	0.5	Reviewed in pari declito research provided by Dan Werner.	600	\$300.00	Brian Sutherland
2/6/23	2	review all MTDs filed by Hyundai, SPJ, Allswell	575	\$1,150.00	Rachel Berlin
2/7/23	0.5	Conference with RBB re: issues presented by motions to dismiss; necessary research; tasks to be divided among team members.	600	\$300.00	Brian Sutherland
2/7/23	1	Conference with team re: schedule and motions to dismiss.	600	\$600.00	Brian Sutherland
2/7/23	1	Conference with BJS re MTD	575	\$575.00	Rachel Berlin
2/7/23	1	Team Zoom re MTD and dividing research	575	\$575.00	Rachel Berlin
2/7/23	0.2	email with KIA opposing counsel re extension to answer	575	\$115.00	Rachel Berlin
2/9/23	0.1	Reviewed notice of electronic filing of clerk's approval of motion for admission PHV by Kristin Greer.	600	\$60.00	Brian Sutherland
2/9/23	0.1	Reviewed notice of electronic filing of joint motion for extension of time by Kia and joint motion.	600	\$60.00	Brian Sutherland
2/9/23	0.3	Review draft pleadings re extension of time to answer MTD and communicate with opposing counsel	575	\$172.50	Rachel Berlin
2/10/23	0.1	Reviewed notice of electronic filing of minute order approving admission of Kristin Greer PHV.	600	\$60.00	Brian Sutherland
2/10/23	2	Begin legal research re motions to dismiss	575	\$1,150.00	Rachel Berlin
2/14/23	0.1	Reviewed notice of electronic filing of order granting joint motion to extend time for Kia to file.	600	\$60.00	Brian Sutherland
2/14/23	0.4	arrange meeting with jorge and translator	575	\$230.00	Rachel Berlin
2/15/23	0.1	Reviewed email from Ben Botts re: rescheduling call re: research for motions to dismiss responses.	600	\$60.00	Brian Sutherland
2/15/23	0.1	Reviewed email from Chris Hall re: rescheduling call re: responses to motions to dismiss.	600	\$60.00	Brian Sutherland

2/15/23	3	Travel to West Point, GA to meet with client Jorge Martinez, conference with	600	\$1,800.00	Brian Sutherland
2/15/23	4.5	travel to/from and meet with Jorge	575	\$2,587.50	Rachel Berlin
2/15/23	0.3	prepare fee agreement	575	\$172.50	Rachel Berlin
2/16/23	0.1	Reviewed and responded to email with RBB re: communication with client Elvis Cruz Vasquez.	600	\$60.00	Brian Sutherland
2/17/23	0.1	Reviewed email from Ben Botts re: EEOC charges of Plaintiffs Perez Salazar and Rivera.	600	\$60.00	Brian Sutherland
2/17/23	0.2	Reviewed and responded to email from Chris Hall and team members re: request for issuance of right to sue for EEOC charges for Perez and Rivera.	600	\$120.00	Brian Sutherland
2/17/23	0.1	Review of email from Dan Werner, RBB, Ben Botts, and Kristen Greer Love re: conference with EEOC Investigator Garcia.	600	\$60.00	Brian Sutherland
2/17/23	0.2	email with Ben Botts re RTS in Job Knowledge EEOC	575	\$115.00	Rachel Berlin
2/17/23	0.3	email with team re: requesting RTS from EEOC on job knowledge charge	575	\$172.50	Rachel Berlin
2/21/23	0.1	Listened to voicemail message from attorney Nick McDaniel re: request re: page limits re: JKL's motion to dismiss.	600	\$60.00	Brian Sutherland
2/21/23	0.1	Reviewed and responded to email from Nick McDaniel re: consent to page limit extension for briefing by JKL.	600	\$60.00	Brian Sutherland
2/21/23	0.4	revise/revise JPA	575	\$230.00	Rachel Berlin
2/22/23	0.4	Review of email from Dan Werner and attached decision in Samuel v. Signal Int'l for RICO briefing.	600	\$240.00	Brian Sutherland
2/22/23	0.2	Review of email from Dan Werner re: RICO causation arguments for briefing in response to motions to dismiss.	600	\$120.00	Brian Sutherland
2/22/23	1	Conference with team re: merits of motions to dismiss SAC and assignment of sections to write.	600	\$600.00	Brian Sutherland
2/23/23	0.1	Review of email from RBB re: clarification of responsibilities for drafting sections of briefs in response to motions to dismiss.	600	\$60.00	Brian Sutherland
2/23/23	0.4	co-counsel Zoom re responding to MTD	575	\$230.00	Rachel Berlin
2/25/23	0.1	Reviewed and responded to email from RBB re: rescheduling call re: motion to dismiss responses.	600	\$60.00	Brian Sutherland
2/25/23	3.5	Research issues raised in Defendants' MTD (SPJ/Allswell/Hyundai) and begin drafting portions of response	575	\$2,012.50	Rachel Berlin

2/26/23	0.2	Confer with BJS re Job Knowledge's request for add'l pages	575	\$115.00	Rachel Berlin
2/26/23	1.6	research on piggyback / single filing rule issue articulated in Defendants' MTD	575	\$920.00	Rachel Berlin
2/27/23	0.2	Review of email from RBB re: piggybacking/single-filing rule and conference with RBB re: same.	600	\$120.00	Brian Sutherland
2/27/23	0.3	Review of Answer filed by Defendant Youngjin Lee.	600	\$180.00	Brian Sutherland
2/27/23	0.5	Review of motion to dismiss filed by Defendant JKL.	600	\$300.00	Brian Sutherland
2/27/23	3	Reviewed research and began drafting and preparing shells for motion to dismiss responses for both Allswell/SPJ and Mobis.	600	\$1,800.00	Brian Sutherland
2/27/23	4.5	continue researching and drafting portions of motion to dismiss response	575	\$2,587.50	Rachel Berlin
2/27/23	0.6	review Defendant Lee's answer to complaint	575	\$345.00	Rachel Berlin
2/27/23	0.7	review Job Knowledge's MTD	575	\$402.50	Rachel Berlin
2/28/23	0.1	Review of email from Ben Botts and other team members re: rescheduling of meeting re: motions to dismiss.	600	\$60.00	Brian Sutherland
2/28/23	0.1	Review of email from RBB and attached news report re: litigation and motions to dismiss.	600	\$60.00	Brian Sutherland
2/28/23	6	Research elements of RICO substantive and conspiracy claims, including enterprise, participation, etc.	600	\$3,600.00	Brian Sutherland
2/28/23	2.6	continue drafting sections of MTD response for SPJ/Allswell/Hyundai	575	\$1,495.00	Rachel Berlin
3/1/23	0.3	email exchange re wage information for Jorge and Elvis	575	\$172.50	Rachel Berlin
3/1/23	0.2	send communication to Jorge [REDACTED]	575	\$115.00	Rachel Berlin
3/1/23	0.2	send communication to Elvis requesting [REDACTED]	575	\$115.00	Rachel Berlin
3/1/23	0.6	review Chris Hall's section of MTD response briefing relating to class allegations	575	\$345.00	Rachel Berlin
3/1/23	0.1	Review of email from KGL re: Allswell Motion to Dismiss.	600	\$60.00	Brian Sutherland
3/1/23	0.1	Review of email from Dan Werner re: W-2 statements.	600	\$60.00	Brian Sutherland
3/1/23	0.1	Review of email thread between RBB and Dan Werner re: W-2 statements.	600	\$60.00	Brian Sutherland
3/1/23	0.1	Review of email from RBB re: piggybacking rule argued by Defendants.	600	\$60.00	Brian Sutherland
3/1/23	0.1	Reviewed emails from RBB with W-2 statements.	600	\$60.00	Brian Sutherland
3/2/23	8	Drafting brief in response to Allswell/SPJ motion to dismiss.	600	\$4,800.00	Brian Sutherland

3/2/23	1	Conference call with team re: briefing and schedule for sharing and editing briefs.	600	\$600.00	Brian Sutherland
3/2/23	8	Continued research for responses to motions to dismiss re: proximate cause, participation, and Georgia RICO claims; drafting of response in opposition to motion to dismiss by Allswell/SPJ.	600	\$4,800.00	Brian Sutherland
3/2/23	1	discuss repsonding to MTD and [REDACTED]	575	\$575.00	Rachel Berlin
3/2/23	0.1	Reviewed email from Ben Botts re: W-2 statements.	600	\$60.00	Brian Sutherland
3/2/23	0.1	Reviewed email from RBB re: section of brief for response to MTD by Allswell.	600	\$60.00	Brian Sutherland
3/2/23	0.1	Reviewed email from Ben Botts re: enterprise subheadings.	600	\$60.00	Brian Sutherland
3/2/23	0.1	Reviewed email from ben Botts re: final filed version of the second amended complaint.	600	\$60.00	Brian Sutherland
3/3/23	2	Conducted research on RICO conspiracy claims and merits and drafting of	600	\$1,200.00	Brian Sutherland
3/3/23	0.5	review Chris' revisions to his section of MTD and incorporate into briefing	575	\$287.50	Rachel Berlin
3/3/23	0.2	send Kristin drafts of motions so she can work on intro	575	\$115.00	Rachel Berlin
3/3/23	0.4	email with team re breach claims	575	\$230.00	Rachel Berlin
3/3/23	0.1	Reviewed email from Chris Hall re: revisions to brief re: motion to dismiss.	600	\$60.00	Brian Sutherland
3/3/23	0.1	Reviewed email from Dan re: [REDACTED]	600	\$60.00	Brian Sutherland
3/3/23	0.1	Reviewed email from RBB re: [REDACTED] incorporating sections of the brief.	600	\$60.00	Brian Sutherland
3/3/23	0.2	Reviewed email from Ben Botts and RBB re: incorporations in briefs for response to Allswell's Motion to Dismiss.	600	\$120.00	Brian Sutherland
3/3/23	0.3	Reviewed email between Chris and Dan re: [REDACTED]	600	\$180.00	Brian Sutherland
3/4/23	0.2	email team re more time to respond to Job Knowledge	575	\$115.00	Rachel Berlin
3/4/23	0.5	review Ben Botts' draft of breach of K response to MTD and incorporate into both brief responses.	575	\$287.50	Rachel Berlin
3/4/23	0.4	review draft motion for leave to amend third amended complaint	575	\$230.00	Rachel Berlin
3/4/23	0.1	Reviewed email from Dan and RBB re: response to Job Knowledge's MTD.	600	\$60.00	Brian Sutherland

3/5/23	4	Conducted research on national origin discrimination under Section 1981 and Title VII; completed drafting and revision of brief in opposition to motion to dismiss by Allswell; drafted email to team re: same.	600	\$2,400.00	Brian Sutherland
3/5/23	0.3	email Job Knowledge's lawyer re: ext of time to repsond and more pages	575	\$172.50	Rachel Berlin
3/5/23	0.4	review draft Third Amended Complaint	575	\$230.00	Rachel Berlin
3/5/23	0.5	Reviewed email from Dan Werner and draft third amended complaint with redlines.	600	\$300.00	Brian Sutherland
3/6/23	0.5	Reviewed draft of third amended complaint from Dan Werner.	600	\$300.00	Brian Sutherland
3/6/23	0.6	draft motion and proposed order to extend pages/DL to respond to JKL's MTD	575	\$345.00	Rachel Berlin
3/6/23	0.4	discuss claims against Hyundai w BJS	575	\$230.00	Rachel Berlin
3/6/23	0.2	email with Ben Botts re scheduling call/division of work	575	\$115.00	Rachel Berlin
3/7/23	0.3	Reviewed introductory paragraph for response in opposition to motion to dismiss by Allswell/SPJ from Kristin Greer Love.	600	\$180.00	Brian Sutherland
3/7/23	0.1	Reviewed email from team members re: scheduling of meeting on status of briefs.	600	\$60.00	Brian Sutherland
3/7/23	1	Attended conference call with team re: status of briefing and plans for review and filing of response briefs.	600	\$600.00	Brian Sutherland
3/7/23	0.7	team call re motion to dismiss briefing and dividing up tasks	575	\$402.50	Rachel Berlin
3/7/23	0.2	email with team re tasks to divide up for MTD responses	575	\$115.00	Rachel Berlin
3/7/23	2.3	review third amended complaint revisions from Dan Werner and revise further	575	\$1,322.50	Rachel Berlin
3/8/23	0.2	Review court order re addt'l time and pages for Job Knowledge response to MTD. Update calendar entries.	575	\$115.00	Rachel Berlin
3/8/23	0.6	Further revisions to third amended complaint; circulate with team and discuss over email.	575	\$345.00	Rachel Berlin
3/8/23	0.3	Discuss draft intro to MTD response with BJS	575	\$172.50	Rachel Berlin
3/8/23	3.5	Review/revise draft response to MTD (SPJ/Allswell brief).	575	\$2,012.50	Rachel Berlin
3/8/23	0.4	Email with Dan Werner and team re: third amended complaint revisions.	575	\$230.00	Rachel Berlin
3/8/23	0.2	Email with Ben Botts re [REDACTED]	575	\$115.00	Rachel Berlin
3/8/23	0.2	Reviewed email from RBB re: further revisions to TAC and revisions to TAC.	600	\$120.00	Brian Sutherland

3/8/23	0.4	Reviewed email from Ben Botts re: revisions to Allswell/SPJ response brief; reviewed and responded to other email from team re: [REDACTED].	600	\$240.00	Brian Sutherland
3/8/23	0.2	Reviewed email from Dan Werner re: updates to draft TAC and [REDACTED].	600	\$120.00	Brian Sutherland
3/8/23	8	Research and drafting of response in opposition to motion to dismiss by Mobis.	600	\$4,800.00	Brian Sutherland
3/8/23	7	Revision and drafting of brief in opposition to motion to dismiss for Mobis; drafted email to team re: same.	600	\$4,200.00	Brian Sutherland
3/9/23	0.4	Email with team re: [REDACTED]; call with investigator re: same	575	\$230.00	Rachel Berlin
3/9/23	2	Further revisions to the response to MTD for SPJ and Allswell	575	\$1,150.00	Rachel Berlin
3/9/23	0.2	email with Elvis Cruz	575	\$115.00	Rachel Berlin
3/9/23	0.3	Email with Dan Werner re Elvis Cruz's wages and review Elvis' timesheets and hours worked.	575	\$172.50	Rachel Berlin
3/9/23	1.3	Zoom call with team to discuss revisions to MTD responses for SPJ, Allswell, Mobis briefing.	575	\$747.50	Rachel Berlin
3/9/23	0.3	Call with Inv. Garcia-Reyes and subsequent emailing re RTS	575	\$172.50	Rachel Berlin
3/9/23	0.5	communications with Jorge Aquino Martinez re TAC and review client documents.	575	\$287.50	Rachel Berlin
3/9/23	0.4	review Third Amended Complaint and admit'l facts of Elvis/Jorge and email re: changes.	575	\$230.00	Rachel Berlin
3/9/23	0.1	Reviewed email from Ben Botts re: message from EEOC Investigator Garcia-Reyes re: notice of right to sue.	600	\$60.00	Brian Sutherland
3/9/23	1	Conference call with Ben Botts, Dan Werner, and RBB re: [REDACTED]	600	\$600.00	Brian Sutherland
3/9/23	0.1	Reviewed email from Dan Werner re: class definitions and other changes.	600	\$60.00	Brian Sutherland
3/9/23	0.1	Reviewed email from team re: [REDACTED].	600	\$60.00	Brian Sutherland
3/9/23	0.1	Reviewed email from RBB re: [REDACTED].	600	\$60.00	Brian Sutherland
3/9/23	0.1	Reviewed email from RBB re: [REDACTED].	600	\$60.00	Brian Sutherland

3/9/23	0.2	Reviewed email between Dan Werner and Ben Botts re: citizenship and alienage discrimination for Section 1981 claim.	600	\$120.00	Brian Sutherland
3/9/23	0.1	Reviewed email from Ben Botts re: edits to brief and Bostock analogy.	600	\$60.00	Brian Sutherland
3/9/23	0.1	Reviewed email from Dan Werner re: changes to TAC relating to support letters and client's reliance.	600	\$60.00	Brian Sutherland
3/9/23	0.2	Reviewed email from Dan Werner with offer letters from clients and proposed changes to the TAC.	600	\$120.00	Brian Sutherland
3/10/23	0.3	review revised exhibits for Third Amended Complaint, feedback to Dan Werner.	575	\$172.50	Rachel Berlin
3/10/23	7	Revise, proof, cite check, finalize briefs for responses to MTD filed by Mobis and Allswell. Finalize and file both.	575	\$4,025.00	Rachel Berlin
3/10/23	2	Research re: citizenship versus alienage discrimination under Section 1981; drafted email to team re: same for revisions.	600	\$1,200.00	Brian Sutherland
3/10/23	1	Review and revision of motion for leave to file TAC; drafted email to Dan Werner re: same.	600	\$600.00	Brian Sutherland
3/10/23	4	Review and revision; preparing table of contents and finalizing briefs in opposition to motions to dismiss by Allswell/SPJ and Mobis; drafted email to RBB re: same.	600	\$2,400.00	Brian Sutherland
3/10/23	0.2	Conference call with Chris Hall re: allegations for TAC before filing.	600	\$120.00	Brian Sutherland
3/10/23	0.5	Review of case law relating to [REDACTED] and drafted email to team re: same.	600	\$300.00	Brian Sutherland
3/10/23	0.1	Reviewed email from Ben Botts re: [REDACTED]	500	\$50.00	Brian Sutherland
3/10/23	0.2	Reviewed email thread between Dan Werner and Ben Botts re: [REDACTED]	600	\$120.00	Brian Sutherland
3/10/23	0.2	Reviewed email from Chris Hall re: [REDACTED]	600	\$120.00	Brian Sutherland
3/10/23	0.5	Reviewed email from Chris Hall re: new citations relating to [REDACTED].	600	\$300.00	Brian Sutherland
3/10/23	0.3	Reviewed email from Ben Botts re: updated TAC.	600	\$180.00	Brian Sutherland
3/10/23	0.2	Reviewed email from Dan Werner re: answers to Ben's questions about amended TAC.	600	\$120.00	Brian Sutherland

3/10/23	0.2	Reviewed email from Dan Werner re: changes to class definition in the TAC.	600	\$120.00	Brian Sutherland
3/13/23	0.2	Email with Dan Werner re: meeting with [REDACTED]	575	\$115.00	Rachel Berlin
3/13/23	0.4	communication with defense counsel Evan Gibbs re Defendants' request re expedited briefing after third amended complaint. Confer with BJS re: same.	575	\$230.00	Rachel Berlin
3/13/23	0.2	Reviewed email from Dan re: meeting with [REDACTED]	600	\$120.00	Brian Sutherland
3/13/23	0.1	Drafted email to team re: JPA changes.	600	\$60.00	Brian Sutherland
3/13/23	0.2	Reviewed email threads between team members re: defendants' request to delay responding to TAC.	600	\$120.00	Brian Sutherland
3/13/23	0.2	Reviewed Sarah Phaff's email with proposed joint motion and order and reviewed email from team re: same.	600	\$120.00	Brian Sutherland
3/14/23	0.4	email with opposing counsel and team re: proposed joint motion re extending	575	\$230.00	Rachel Berlin
3/14/23	0.2	Reviewed email from Ben Botts to opposing counsel and responsive emails with revisions of motions to extend deadlines and schedule briefing.	600	\$120.00	Brian Sutherland
3/15/23	0.2	email with team rescheduling call	575	\$115.00	Rachel Berlin
3/15/23	0.4	review court order re: deadlines for renewed TAC/MTD. Calendar all deadlines.	575	\$230.00	Rachel Berlin
3/15/23	0.1	Reviewed email from Magistrate Judge's clerk re: ruling on motion.	600	\$60.00	Brian Sutherland
3/16/23	0.4	Team call re tasks to be completed	575	\$230.00	Rachel Berlin
3/16/23	0.4	Email Evan Gibbs re proceeding with discovery/R26 conference re: Paul Lee and FLSA claims.	575	\$230.00	Rachel Berlin
3/16/23	0.1	Reviewed email from RBB re: scheduling JPR call with Paul Lee.	600	\$60.00	Brian Sutherland
3/16/23	0.1	Reviewed email from Evan Gibbs re: JPR call for Paul Lee.	600	\$60.00	Brian Sutherland
3/16/23	0.1	Reviewed email between RBB and Evan Gibbs re: stay of discovery.	600	\$60.00	Brian Sutherland
3/20/23	0.2	Email with Dan Werner re filing of TAC per Judge's order	575	\$115.00	Rachel Berlin
3/20/23	0.3	Call with Evan Gibbs re discovery against Paul Lee.	575	\$172.50	Rachel Berlin
3/20/23	0.3	Update team on Call with Evan Gibbs re discovery against Paul Lee.	575	\$172.50	Rachel Berlin
3/20/23	0.3	Follow up call with Evan Gibbs re discovery re Paul Lee and confer with BJS re: same. Email Gibbs re Plaintiffs' position on open of discovery.	575	\$172.50	Rachel Berlin
3/20/23	0.3	Email with Ben Botts re [REDACTED]	575	\$172.50	Rachel Berlin
3/20/23	0.1	Reviewed email between Dan and team re: edits to TAC before filing.	600	\$60.00	Brian Sutherland
3/22/23	0.4	Review PS from Mobis for Salazar EEOC charge and email team re: same.	575	\$230.00	Rachel Berlin

3/22/23	0.1	Reviewed position statement submitted by Mobis to Salazar charge; reviewed email from team members re: same.	600	\$60.00	Brian Sutherland
3/22/23	0.2	TN visa team call re tasks to be completed	575	\$115.00	Rachel Berlin
3/24/23	0.3	Reviewed email from Ben Botts with position statements for Aaron Perez charge attached and position statements.	600	\$180.00	Brian Sutherland
3/27/23	0.2	email team re: preparing discovery requests for Defendant Lee.	575	\$115.00	Rachel Berlin
3/27/23	0.7	review positions statements by Kia and JKL in Salazar's EEOC case and communications with team re: same.	575	\$402.50	Rachel Berlin
3/27/23	0.1	Reviewed email from RBB re: discovery against Paul Lee and joint employer arguments.	600	\$60.00	Brian Sutherland
3/28/23	0.5	review motion to stay with brief filed by Defendant Lee.	575	\$287.50	Rachel Berlin
3/28/23	0.1	Reviewed court order re: undeliverable mail.	600	\$60.00	Brian Sutherland
3/28/23	0.2	Reviewed motion to stay discovery and pretrial deadlines.	600	\$120.00	Brian Sutherland
3/29/23	0.2	team call re tasks to be completed	575	\$115.00	Rachel Berlin
3/30/23	0.1	Reviewed court order re: undeliverable mail.	600	\$60.00	Brian Sutherland
4/5/23	0.3	team call re: case	575	\$172.50	Rachel Berlin
4/5/23	0.1	Reviewed email from Dan Werner and Ben Botts re: [REDACTED]	600	\$60.00	Brian Sutherland
4/5/23	0.1	Reviewed email from KGL and Ben Botts re: scheduling of Zoom meeting.	600	\$60.00	Brian Sutherland
4/5/23	0.1	Reviewed email from RBB re: opposition to motion to stay proceedings by Paul Lee.	600	\$60.00	Brian Sutherland
4/9/23	3.4	Review Defendant Lee's motion to stay. Research cases cited by Defendant and conduct further research in support of opposition. Draft response brief.	575	\$1,955.00	Rachel Berlin
4/9/23	0.3	Reviewed draft opposition to motion to stay proceedings provided by RBB.	600	\$180.00	Brian Sutherland
4/10/23	0.3	review Dan's edits to briefing opposing Defendant Lee's motion to stay discovery; provide feedback on same.	575	\$172.50	Rachel Berlin
4/10/23	0.3	review Ben and Kristin's edits to response brief opposing motion to stay	575	\$172.50	Rachel Berlin
4/10/23	0.2	Reviewed email and attached documents from Dan Werner re: application for default and opposition to motion to stay.	600	\$120.00	Brian Sutherland
4/10/23	0.1	Reviewed email from KGL re: application for default.	600	\$60.00	Brian Sutherland
4/10/23	0.1	Reviewed email from RBB re: default.	600	\$60.00	Brian Sutherland
4/10/23	0.2	Reviewed email from KGL re: edits to opposition to motion to stay discovery.	600	\$120.00	Brian Sutherland

4/10/23	0.2	Reviewed email from Dan Werner re: edits to opposition to Lee's motion to stay.	600	\$120.00	Brian Sutherland
4/10/23	0.2	Reviewed edits to opposition to motion to stay by Chris Hall and Dan Werner.	600	\$120.00	Brian Sutherland
4/10/23	0.2	Reviewed edits to opposition to motion to dismiss by KGL and Ben Botts.	600	\$120.00	Brian Sutherland
4/10/23	0.1	Reviewed email from team re: filing for default against Paul Lee.	600	\$60.00	Brian Sutherland
4/11/23	0.3	email with Ben Botts and team re: [REDACTED]	575	\$172.50	Rachel Berlin
4/11/23	0.2	Reviewed email from Kristin Love re: [REDACTED].	600	\$120.00	Brian Sutherland
4/11/23	0.3	Reviewed opposition to motion to stay discovery as to Defendant Paul Lee.	600	\$180.00	Brian Sutherland
4/11/23	0.1	Reviewed email from Kristin Greer Love re: [REDACTED]	600	\$60.00	Brian Sutherland
4/11/23	0.1	Review of email from RBB re: [REDACTED].	600	\$60.00	Brian Sutherland
4/11/23	0.1	Review of email from Werner re: [REDACTED]	600	\$60.00	Brian Sutherland
4/11/23	0.2	Reviewed email from Ben Botts re: [REDACTED]	600	\$120.00	Brian Sutherland
4/11/23	0.3	Reviewed email from Ben Botts re: [REDACTED]	600	\$180.00	Brian Sutherland
4/11/23	0.1	Reviewed email between team members re: moving for default against Paul Lee.	600	\$60.00	Brian Sutherland
4/18/23	0.3	review Kristin Greer email re client VOC's NLRB charge and withdrawal of same.	575	\$172.50	Rachel Berlin
4/18/23	0.1	Reviewed email from KGL re: Castillo charge dismissal.	600	\$60.00	Brian Sutherland
4/19/23	0.2	Reviewed email from Kristin Greer Love re: NLRB determination; drafted email response re: joint employer facts.	600	\$120.00	Brian Sutherland
4/19/23	0.2	team call re MTD pending and EEOC investigation status.	575	\$115.00	Rachel Berlin
4/19/23	0.1	Reviewed email from KGL re: joint employer status; drafted email in response.	600	\$60.00	Brian Sutherland
4/19/23	1	Compare old/new MTD's filed by Defendants Mobis, Job Knowledge, SPJ/Allswell. Email team re: same.	575	\$575.00	Rachel Berlin
4/19/23	0.7	Reviewed email from Dan Werner and attached comparison report re: new motion to dismiss filings as compared with old motion to dismiss filings.	600	\$420.00	Brian Sutherland

4/20/23	0.2	Review TESS CIP	575	\$115.00	Rachel Berlin
4/20/23	0.2	Review KIA CIP	575	\$115.00	Rachel Berlin
4/24/23	0.4	Team call re division of work in responding to MTDs filed by Defendants.	575	\$230.00	Rachel Berlin
4/24/23	0.3	review Defendant Lee's reply brief in support of his request for a stay of discovery.	575	\$172.50	Rachel Berlin
4/24/23	0.3	Reviewed reply in support of motion to stay filed by Defendant Paul Lee.	600	\$180.00	Brian Sutherland
4/25/23	0.3	email re moving for 216(b) and strategy for same.	575	\$172.50	Rachel Berlin
4/25/23	0.3	draft email to lawyers for Hyundai, Kia, Allswell, Lee, and JKL re consenting to 216(b) motion.	575	\$172.50	Rachel Berlin
4/25/23	0.1	Reviewed email from RBB re: FLSA conditional certification questions.	600	\$60.00	Brian Sutherland
4/25/23	0.1	Reviewed email between team members re: asking opposing counsel to consent to conditional certification.	600	\$60.00	Brian Sutherland
4/26/23	0.3	email defense counsel re consenting to 216(b)	575	\$172.50	Rachel Berlin
4/26/23	0.2	Email re: linkedin job postings by clients.	600	\$120.00	Brian Sutherland
5/1/23	0.2	email from Evan Gibbs re consent motion for 216(b)	575	\$115.00	Rachel Berlin
5/1/23	0.1	Reviewed CM/ECF notice re: submission of motion to stay to magistrate judge.	600	\$60.00	Brian Sutherland
5/1/23	0.1	Reviewed email from opposing counsel re: no consent to conditional certification.	600	\$60.00	Brian Sutherland
5/2/23	0.2	email with team re preparing 216(b) motion	575	\$115.00	Rachel Berlin
5/2/23	0.1	Reviewed email from team members re: responding to Evan Gibbs's email about conditional certification and drafting of motion for same.	600	\$60.00	Brian Sutherland
5/3/23	0.3	team call re responding to MTDs.	575	\$172.50	Rachel Berlin
5/8/23	0.2	Reviewed email from KGL re: changes to contract brief section and attached edits.	600	\$120.00	Brian Sutherland
5/9/23	1	Reviewed briefs from opposing parties and drafted outline on sections for distribution to team.	600	\$600.00	Brian Sutherland
5/10/23	0.4	review JKL settlement proposal and email with team re same	575	\$230.00	Rachel Berlin
5/10/23	0.3	team call re outstanding MTDs	575	\$172.50	Rachel Berlin
5/10/23	0.4	Reviewed offer of settlement for Perez; call with RBB re: same; participated in conference call with team re: [REDACTED].	600	\$240.00	Brian Sutherland

5/10/23	0.2	Reviewed offer to Aaron Perez and email between team members re: same.	600	\$120.00	Brian Sutherland
5/11/23	1.3	work on revising response brief to SPJ/Allswell MTD the TAC, and incorporate	575	\$747.50	Rachel Berlin
5/11/23	0.4	begin work on revising response brief to Mobis MTD the TAC	575	\$230.00	Rachel Berlin
5/15/23	2	revise citations and revise briefing to respond to SPJ/Allswell MTD the TAC.	575	\$1,150.00	Rachel Berlin
5/15/23	0.3	Reviewed email between Chris Hall with draft of SPJ/Allswell brief and RBB and attached documents.	600	\$180.00	Brian Sutherland
5/16/23	5	Review and revision of SPJ/Allswell brief in comparison with new MTD	600	\$3,000.00	Brian Sutherland
5/16/23	0.1	Reviewed email from Ben Botts and Dan Werner re: schedule for exchanging drafts of briefs.	600	\$60.00	Brian Sutherland
5/17/23	3	Review and revision of brief in response to MTD filed by SPJ/Allswell.	600	\$1,800.00	Brian Sutherland
5/17/23	2.4	change citations throughout Mobis response to MTD briefing.	575	\$1,380.00	Rachel Berlin
5/17/23	0.3	team conference call.	575	\$172.50	Rachel Berlin
5/17/23	0.2	Reviewed email from KGL re: EEOC charges and CDM conference with EEOC re: clients.	600	\$120.00	Brian Sutherland
5/17/23	0.4	Reviewed and responded to email from Ben Botts re: [REDACTED] and related authorities.	600	\$240.00	Brian Sutherland
5/18/23	0.3	Conference with Charles McKnight re: possible settlement; drafted email to team re: same.	600	\$180.00	Brian Sutherland
5/18/23	0.2	email with team re JKL settlement discussions.	575	\$115.00	Rachel Berlin
5/18/23	3	Revised response in opposition to motion to dismiss filed by Mobis.	600	\$1,800.00	Brian Sutherland
5/18/23	3	work on revisions to MTD responses (SPJ, Allswell, Mobis)	575	\$1,725.00	Rachel Berlin
5/18/23	0.4	Reviewed email from Ben Botts and attached brief section re: FLSA.	600	\$240.00	Brian Sutherland
5/19/23	5	work on revisions to MTD responses (SPJ, Allswell, Mobis), finalize and file same.	575	\$2,875.00	Rachel Berlin
5/19/23	0.1	Reviewed email from Chris Hall and Dan Werner re: FLSA issue for brief.	600	\$60.00	Brian Sutherland
5/19/23	0.5	Reviewed email from Ben Botts with revisions to the response to MTD by Mobis.	600	\$300.00	Brian Sutherland
5/19/23	0.2	Reviewed email from RBB re: final brief in response to Allswell.	600	\$120.00	Brian Sutherland
5/19/23	0.1	Reviewed email between Chris Hall and RBB re: [REDACTED]	600	\$60.00	Brian Sutherland
5/20/23	1.5	begin drafting response to JKL MTD.	575	\$862.50	Rachel Berlin

5/20/23	1.5	begin drafting response to TESS MTD.	575	\$862.50	Rachel Berlin
5/23/23	0.1	Reviewed email from Ben Botts and Dan Werner re: [REDACTED].	600	\$60.00	Brian Sutherland
5/23/23	0.1	Reviewed email between RBB and KGL and Ben Botts re: edits to brief in response to Mobis MTD.	600	\$60.00	Brian Sutherland
5/30/23	0.2	confer with BJS re brief responses.	575	\$115.00	Rachel Berlin
5/30/23	5	work on response to JKL MTD	575	\$2,875.00	Rachel Berlin
5/31/23	0.2	review BJS' proposed communication to Charles McKnight re JKL possible resolution and docs needed.	575	\$115.00	Rachel Berlin
5/31/23	0.2	team call re responding to MTDs in Mobis case.	575	\$115.00	Rachel Berlin
5/31/23	11	Revised and drafted response in opposition to TESS's motion to dismiss; conference with RBB re: same; drafted email to team re: same.	600	\$6,600.00	Brian Sutherland
5/31/23	3	Begin drafting response to Kia MTD.	575	\$1,725.00	Rachel Berlin
5/31/23	0.5	discuss TESS/JKL/Kia briefing / MTD with Brian Sutherland	575	\$287.50	Rachel Berlin
6/1/23	0.5	discuss TESS/JKL/Kia briefing / MTD with Brian Sutherland	575	\$287.50	Rachel Berlin
6/1/23	5	work on Kia MTD response	575	\$2,875.00	Rachel Berlin
6/1/23	8	Revised, researched, drafted response in opposition to motion to dismiss by JKL.	600	\$4,800.00	Brian Sutherland
6/1/23	0.1	Reviewed and responded to email re: [REDACTED].	600	\$60.00	Brian Sutherland
6/1/23	0.5	Reviewed email from KGL and RBB re: contract section from CDM for JKL response brief and attached draft.	600	\$300.00	Brian Sutherland
6/2/23	6	Revised, conducted research, and drafted response in opposition to motion to dismiss by JKL.	600	\$3,600.00	Brian Sutherland
6/2/23	0.5	Reviewed email from Ben Botts with suggested revisions and edits for brief in response to TESS MTD.	600	\$300.00	Brian Sutherland
6/3/23	5	Revised, conducted research, and drafted response in opposition to motion to dismiss by Kia.	600	\$3,000.00	Brian Sutherland
6/3/23	0.1	Drafted email to team re: brief in response to Kia MTD.	600	\$60.00	Brian Sutherland
6/5/23	4	review CDM's edits to JKL, TESS, and Kia's briefs. Incorporate edits and finalize briefing. File on ECF.	575	\$2,300.00	Rachel Berlin
6/5/23	0.5	Reviewed email from Ben Botts and Chris Hall re: edits to brief in response to Kia MTD.	600	\$300.00	Brian Sutherland

6/5/23	0.1	Reviewed CM/ECF notices for e-filing of response briefs.	600	\$60.00	Brian Sutherland
6/9/23	0.8	review reply briefs filed by Mobis, SPJ, Allswell in support of their MTD.	575	\$460.00	Rachel Berlin
6/10/23	0.4	Reviewed reply briefs filed by Mobis and SPJ/Allswell.	600	\$240.00	Brian Sutherland
6/10/23	0.2	Drafted email to Charles McKnight re: settlement of Perez's claims against JKL.	600	\$120.00	Brian Sutherland
6/13/23	0.2	email from JKL lawyer Charles Knight re lack of interest in class settlement.	575	\$115.00	Rachel Berlin
6/13/23	0.1	Reviewed email from Charles McKnight re: response to correspondence re: settlement.	600	\$60.00	Brian Sutherland
6/14/23	0.2	email re upcoming team call and rescheduling same.	575	\$115.00	Rachel Berlin
6/14/23	0.1	Reviewed email from team members re: no need to have a meeting.	600	\$60.00	Brian Sutherland
6/26/23	0.5	review JKL reply brief in support of MTD.	575	\$287.50	Rachel Berlin
6/26/23	0.5	review Kia's reply in support of MTD	575	\$287.50	Rachel Berlin
6/26/23	0.8	Reviewed reply briefs filed by Kia and JKL.	600	\$480.00	Brian Sutherland
7/17/23	0.1	Reviewed CM/ECF filings re: application for new CDM lawyers to be admitted PHV.	600	\$60.00	Brian Sutherland
7/30/23	0.2	review and file motion to substitute counsel for CDM.	575	\$115.00	Rachel Berlin
7/31/23	0.4	review motion to withdraw/substitute counsel for CDM; confer with attorneys.	575	\$230.00	Rachel Berlin
7/31/23	0.1	Reviewed CM/ECF filing re: motion to substitute attorneys for CDM.	600	\$60.00	Brian Sutherland
8/21/23	0.2	update Ben Botts on motion; send docket entry to him and Abigail.	575	\$115.00	Rachel Berlin
8/31/23	0.1	Reviewed email from Abby Kerfoot re: new opt-in for Mobis.	600	\$60.00	Brian Sutherland
9/1/23	0.2	review draft FLSA consent to join form prepared by CDM	575	\$115.00	Rachel Berlin
9/6/23	0.1	Reviewed email between team members re: meeting at [REDACTED]	600	\$60.00	Brian Sutherland
9/11/23	0.1	Reviewed CM/ECF notices of orders granting motions for PHV admission.	600	\$60.00	Brian Sutherland
9/14/23	0.2	email Inv. Garcia-Reyes re status of Aaron Salazar investigation.	575	\$115.00	Rachel Berlin
9/14/23	0.5	Call with Inv. Garcia-Reyes re status of investigation and share with team.	575	\$287.50	Rachel Berlin
9/14/23	0.2	Reviewed email between RBB and Steven Garcia-Reyes and Chris Hall re: EEOC charges for Salazar and Rivera.	600	\$120.00	Brian Sutherland
9/16/23	0.5	Review draft statement of interest letter prepared by CDM. Provide feedback and revisions to same.	575	\$287.50	Rachel Berlin
9/18/23	0.2	email with CDM re support letter	575	\$115.00	Rachel Berlin

9/18/23	0.1	Reviewed email from Abby Kerfoot to EEOC requesting statement of interest.	600	\$60.00	Brian Sutherland
9/20/23	0.2	email with EEOC re statement of interest request.	575	\$115.00	Rachel Berlin
11/18/23	0.3	Reviewed email from Marcus Keegan providing Statement of Interest on behalf of EEOC.	600	\$180.00	Brian Sutherland
11/28/23	0.5	Review statement of interested from EEOC.	575	\$287.50	Rachel Berlin
11/28/23	0.2	send messages to Jorge and Elvis on WhatsApp re [REDACTED]	575	\$115.00	Rachel Berlin
11/28/23	0.1	Reviewed email from team members re: statement of interest.	600	\$60.00	Brian Sutherland
11/29/23	0.2	Update team re Kia/Allswell relationship.	575	\$115.00	Rachel Berlin
11/29/23	0.1	team Zoom, discuss SOI.	575	\$57.50	Rachel Berlin
12/6/23	0.3	WhatsApp communications with plaintiff Jorge Martinez.	575	\$172.50	Rachel Berlin
12/20/23	0.4	Reviewed notice of supplemental authority; exchanged email with Dan Werner re: same; prepared and filed in CM/ECF.	600	\$240.00	Brian Sutherland
12/20/23	0.5	Drafted notice of supplemental authority re: Columbia Recycling decision.	600	\$300.00	Brian Sutherland
12/21/23	0.2	Reviewed email from opposing counsel re: extra briefing re: notice of supplemental authority, and email between team members re: same.	600	\$120.00	Brian Sutherland
12/22/23	0.2	Email Evan Gibbs re position on briefing supplemental authority.	575	\$115.00	Rachel Berlin
12/22/23	0.1	Reviewed email from RBB re: briefing to strike response brief re: supplemental authority.	600	\$60.00	Brian Sutherland
1/2/24	0.3	review judge vineyard order on defendant lee's motion to stay.	575	\$172.50	Rachel Berlin
1/2/24	1	Reviewed order denying motion to dismiss; conference with RBB re: same; drafted email to team re: status.	600	\$600.00	Brian Sutherland
1/2/24	1.3	Read Vineyard's non-final R&R. Discuss order with BJS.	575	\$747.50	Rachel Berlin
1/2/24	0.3	Update Plaintiff Jorge Martinez on [REDACTED]	575	\$172.50	Rachel Berlin
1/2/24	0.2	Review of court's order staying discovery.	600	\$120.00	Brian Sutherland
1/2/24	0.7	Reviewed R&R re: motions to dismiss.	600	\$420.00	Brian Sutherland
1/4/24	0.2	email [REDACTED]	575	\$115.00	Rachel Berlin
1/5/24	0.5	Draft email to opposing counsel re consenting to 216(b); confer with co-counsel re same and revise accordingly.	575	\$287.50	Rachel Berlin
1/5/24	0.2	Reviewed email between team members re: 216(b) consent.	600	\$120.00	Brian Sutherland

1/5/24	0.1	Reviewed email from opposing counsel re: motion for leave to file excess pages in objections to R&R.	600	\$60.00	Brian Sutherland
1/5/24	0.1	Reviewed and responded to email from team members re: extra pages for objections briefing.	600	\$60.00	Brian Sutherland
1/8/24	0.2	email team re [REDACTED].	575	\$115.00	Rachel Berlin
1/8/24	0.2	Send email to Defendants Hyundai, Kia, JKL, Allswell re consenting to 216(b).	575	\$115.00	Rachel Berlin
1/8/24	0.1	Reviewed email from Kerfoot to Keegan re: SOI.	600	\$60.00	Brian Sutherland
1/9/24	0.1	Reviewed CM/ECF notices of new attorney appearances for defendants.	600	\$60.00	Brian Sutherland
1/10/24	0.2	Co-counsel meeting re objecting to R&R	575	\$115.00	Rachel Berlin
1/10/24	0.1	Reviewed order granting motion to extend time for objections.	600	\$60.00	Brian Sutherland
1/17/24	0.1	co counsel meeting re case status.	575	\$57.50	Rachel Berlin
1/19/24	0.2	email from Evan Gibbs re Defendants opposing FLSA conditional cert.	575	\$115.00	Rachel Berlin
1/24/24	0.1	Reviewed email from Dan Werner to Marcus Keegan re: SOI.	600	\$60.00	Brian Sutherland
1/25/24	0.2	Email with Marcus Keegan re SOI for Kia.	575	\$115.00	Rachel Berlin
2/8/24	4	Drafted objections to R&R for the breach of contract section.	600	\$2,400.00	Brian Sutherland
2/8/24	0.7	review / revise objections to R&R	575	\$402.50	Rachel Berlin
2/8/24	0.2	Reviewed and responded to email from Dan Werner re: edits to objections to R&R.	600	\$120.00	Brian Sutherland
2/8/24	0.5	Reviewed email from Dan Werner re: R&R objections addition.	600	\$300.00	Brian Sutherland
2/9/24	0.4	Call with potential client Luis [REDACTED]	575	\$230.00	Rachel Berlin
2/9/24	0.5	review revisions to R&R and final brief filed.	575	\$287.50	Rachel Berlin
2/9/24	0.2	Reviewed email from Ricardo Gilb, Kerfoot, and RBB re: communications from [REDACTED].	600	\$120.00	Brian Sutherland
2/9/24	0.4	Reviewed email from Chris Hall with edits to objections and email between team members re: same.	600	\$240.00	Brian Sutherland
2/10/24	1.5	Reviewed objections to R&R filed by each defendant.	600	\$900.00	Brian Sutherland
2/13/24	1.5	Speak with new potential plaintiff Luis	575	\$862.50	Rachel Berlin
2/14/24	0.5	Team call re motions to dismiss and responses.	575	\$287.50	Rachel Berlin
2/14/24	0.2	Discuss new witness w/team in case against Kia	575	\$115.00	Rachel Berlin
2/14/24	0.2	Email Defendants re: request for more time.	575	\$115.00	Rachel Berlin

2/15/24	2.5	Draft Joint Motion for Extension of Time to File Response to' Objections to RRO; draft Proposed Order.	100	\$250.00	Max Lavinthal
2/15/24	0.2	email Marcus Keegan - EEOC attorney - re SOI status on Kia matter.	575	\$115.00	Rachel Berlin
2/15/24	0.2	email with Defendants' counsel re extension of time to respond to objections.	575	\$115.00	Rachel Berlin
2/15/24	0.4	Review and revise draft joint motion prepared by Max. Send to opposing counsel.	575	\$230.00	Rachel Berlin
2/15/24	0.2	Reviewed draft motion to extend time drafted by Max Lavinthal and email between RBB and Max re: same.	600	\$120.00	Brian Sutherland
2/16/24	0.2	Emails with defense counsel re changes to joint motion to extend deadline to object to R&R	575	\$115.00	Rachel Berlin
2/16/24	0.2	Reviewed email from Mike Lucas and David Kresser and Gibbs re: extension of time.	600	\$120.00	Brian Sutherland
2/21/24	0.5	Reviewed briefs and drafted email to team re: assignments.	600	\$300.00	Brian Sutherland
2/21/24	1.4	begin reviewing defendants' objections to R&R	575	\$805.00	Rachel Berlin
2/21/24	0.2	team call with Dan Werner and CDM	575	\$115.00	Rachel Berlin
2/22/24	0.2	Talk to Marcus Keegan re SOI.	575	\$115.00	Rachel Berlin
2/22/24	0.2	Emails with team re [REDACTED].	575	\$115.00	Rachel Berlin
2/25/24	0.1	Reviewed email re: requested extension of time to respond to Plaintiff's objections to R&R.	600	\$60.00	Brian Sutherland
2/27/24	0.5	Reviewed email from Abigail Kerfoot re: additional authorities re: mail fraud.	600	\$300.00	Brian Sutherland
2/28/24	0.2	team call.	575	\$115.00	Rachel Berlin
3/1/24	2.5	begin drafting response to Kia's objections to RR	575	\$1,437.50	Rachel Berlin
3/2/24	2	drafting responses to Kia objections.	600	\$1,200.00	Brian Sutherland
3/2/24	1	drafting response to Kia objections to RR	575	\$575.00	Rachel Berlin
3/3/24	1.5	Draft objections to Mobis R&R objections	575	\$862.50	Rachel Berlin
3/3/24	1	Drafting responses to JKL and Mobis objections.	600	\$600.00	Brian Sutherland
3/3/24	0.2	Drafted email to Abigail Kerfoot re: additional authorities re: mail fraud.	600	\$120.00	Brian Sutherland
3/4/24	3	Drafted responses to JKL objections.	600	\$1,800.00	Brian Sutherland
3/5/24	6	Drafted responses to JKL objections.	600	\$3,600.00	Brian Sutherland

3/6/24	1	work on drafting responses to objections on Title VII/1981 claims.	575	\$575.00	Rachel Berlin
3/6/24	3.5	Drafted responses to objections by TESS.	600	\$2,100.00	Brian Sutherland
3/6/24	0.2	Reviewed email from Abigail Kerfoot re: research and research help.	600	\$120.00	Brian Sutherland
3/7/24	3	Continue drafting response to R&R for Defendants who objected to Title VII and 1981 claims.	575	\$1,725.00	Rachel Berlin
3/7/24	6	Drafted and finalized draft responses to objections by JKL and TESS.	600	\$3,600.00	Brian Sutherland
3/10/24	5	Drafts responses to objections by Kia.	600	\$3,000.00	Brian Sutherland
3/11/24	4	Drafted and finalized objections to R&R and sent email to team re: same.	600	\$2,400.00	Brian Sutherland
3/12/24	0.5	Reviewed email from Dan Werner re: extraterritoriality and attached draft brief section.	600	\$300.00	Brian Sutherland
3/12/24	0.2	Reviewed email between RBB and Dan Werner re: [REDACTED]	600	\$120.00	Brian Sutherland
3/13/24	0.3	co-counsel team meeting on Zoom re responding to R&R objections due this week. Coordinate plan for finalizing same.	575	\$172.50	Rachel Berlin
3/13/24	0.5	Reviewed email from Chris Hall re: section re: causation and injury.	600	\$300.00	Brian Sutherland
3/13/24	0.2	Reviewed email from Chris Hall and RBB re: [REDACTED]	600	\$120.00	Brian Sutherland
3/14/24	0.2	email Marcus Keegan re Kia Statement of Interest request.	575	\$115.00	Rachel Berlin
3/14/24	0.2	update from D. Werner re [REDACTED].	575	\$115.00	Rachel Berlin
3/14/24	0.3	begin revising response to Mobis R*R objections.	575	\$172.50	Rachel Berlin
3/14/24	1.7	read SPJ and Allswell objections. revise/finalize response to SPJ and Allswell objection	575	\$977.50	Rachel Berlin
3/14/24	1	read JKL objections to RR. review/revise/finalize response to same.	575	\$575.00	Rachel Berlin
3/14/24	0.5	Reviewed email from Dan Werner re: wage shortfall section for Mobis objections.	600	\$300.00	Brian Sutherland
3/14/24	0.5	Reviewed email from Chris Hall re: changes and revisions to H&L sections for briefs.	600	\$300.00	Brian Sutherland
3/15/24	0.3	review JKL's response to Plaintiff's objections to RR	575	\$172.50	Rachel Berlin
3/15/24	5.5	revise, finalize briefing responding to various defendants' objections and read underlying briefing/objection.	575	\$3,162.50	Rachel Berlin
3/15/24	0.2	Update from Marcus Keegan re Kia SOI	575	\$115.00	Rachel Berlin
3/15/24	1.5	Final re-formatting of responses to objections and filing.	600	\$900.00	Brian Sutherland

3/15/24	0.2	Reviewed emails between team members re: finalization of briefs in response to objections by defendants for filing.	600	\$120.00	Brian Sutherland
3/16/24	0.4	read Kia's response to Pltf's objections	575	\$230.00	Rachel Berlin
3/25/24	0.2	email with Marcus Keegan re status of SOI	575	\$115.00	Rachel Berlin
3/25/24	0.3	email with team re Heber Zapata job/deferred action.	575	\$172.50	Rachel Berlin
3/27/24	0.4	Call with Brandon Smith re: GB2G factual information.	600	\$240.00	Brian Sutherland
4/2/24	0.1	Reviewed email re: Heber Zapata.	600	\$60.00	Brian Sutherland
4/4/24	0.3	talk to Marcus Keegan re Kia SOI, update team.	575	\$172.50	Rachel Berlin
4/12/24	0.2	new SOI from Marcus; share with team	575	\$115.00	Rachel Berlin
4/12/24	0.3	Reviewed email from Marcus Keegan re: SOI and attached SOI.	600	\$180.00	Brian Sutherland
5/28/24	1	Review of order and research re: punitive damages in RICO cases.	600	\$600.00	Brian Sutherland
5/28/24	1	Email with team re Batten's order on MTD; review prior pleadings re: upcoming deadlines. Emails from BJS re punitive damage in RICO cases.	575	\$575.00	Rachel Berlin
5/28/24	1	Read Batten's decision on MTD	575	\$575.00	Rachel Berlin
5/29/24	0.8	team call regarding motion to dismiss order from Batten and [REDACTED]	575	\$460.00	Rachel Berlin
5/29/24	0.3	analysis of Muldrow decision and communication with team re legal basis to [REDACTED].	575	\$172.50	Rachel Berlin
5/29/24	0.1	Reviewed email from RBB re: [REDACTED]	600	\$60.00	Brian Sutherland
5/31/24	0.1	Reviewed email from opposing counsel re: extension of time to answer.	600	\$60.00	Brian Sutherland
6/3/24	0.2	emails re moving for reconsideration	575	\$115.00	Rachel Berlin
6/3/24	0.2	draft proposed email to clients re MTD order.	575	\$115.00	Rachel Berlin
6/3/24	1	Reviewed email from Chris re: [REDACTED]	600	\$600.00	Brian Sutherland
6/4/24	0.2	email with opposing counsel re request for extension of time to file answer email team proposed email to clients.	575	\$115.00	Rachel Berlin
6/4/24	0.2	Email plaintiffs Jorge and Elvis re [REDACTED]	575	\$115.00	Rachel Berlin
6/5/24	1.5	call with RBB re: [REDACTED]	600	\$900.00	Brian Sutherland
6/5/24	0.2	review consent motion and check if Lee already answered TAC	575	\$115.00	Rachel Berlin
6/5/24	0.5	team call re motion for reconsideration	575	\$287.50	Rachel Berlin
6/5/24	0.5	call with BJS re [REDACTED]	575	\$287.50	Rachel Berlin

6/5/24	0.5	Call with RBB re: reconsideration options; drafted email memo to team re: thoughts for reconsideration.	600	\$300.00	Brian Sutherland
6/5/24	0.2	Reviewed email from Dan Werner re: options for moving for reconsideration.	600	\$120.00	Brian Sutherland
6/6/24	0.2	review email from EEOC issuing right to sue for Salazar. Email w/team re same.	575	\$115.00	Rachel Berlin
6/6/24	1.3	Re-read motion to dismiss order re: T7/1981 claims, conduct legal research for motion for reconsideration.	575	\$747.50	Rachel Berlin
6/9/24	2	Draft motion for reconsideration	575	\$1,150.00	Rachel Berlin
6/9/24	0.5	Reviewed draft motion for reconsideration by RBB.	600	\$300.00	Brian Sutherland
6/10/24	0.3	review BJS edits to motion for reconsideration. further revise same.	575	\$172.50	Rachel Berlin
6/11/24	0.2	circulate motion for reconsideration to team.	575	\$115.00	Rachel Berlin
6/12/24	0.4	review Dan edits to motion for reconsideration; finalize and file w/court.	575	\$230.00	Rachel Berlin
6/12/24	0.2	team call re EEOC's issuance of NRTS	575	\$115.00	Rachel Berlin
6/12/24	0.2	Reviewed email from Henna Kaura re: call with client Aaron.	600	\$120.00	Brian Sutherland
6/12/24	0.2	Reviewed email from Dan Werner re: motion for reconsideration edits.	600	\$120.00	Brian Sutherland
6/16/24	0.3	Email Henna re RTS and Aaron Salazar.	575	\$172.50	Rachel Berlin
6/16/24	0.1	Email Inv. Garcia-reyes	575	\$57.50	Rachel Berlin
6/16/24	0.1	Reviewed email re: RTS issued for Salazar and drafted email to team re: same.	600	\$60.00	Brian Sutherland
6/20/24	0.3	Email with and call with Inv. Garcia-Reyes and update team re same	575	\$172.50	Rachel Berlin
6/20/24	0.2	email foia request for Mobis/Kia charges to EEOC.	575	\$115.00	Rachel Berlin
6/24/24	0.3	email from Evan Gibbs. Confer with co-counsel and propose consent for 216(b) agreement.	575	\$172.50	Rachel Berlin
6/24/24	0.1	Reviewed email from o/c re: extension of time for filing of answers; emails between team re: same.	600	\$60.00	Brian Sutherland
6/26/24	0.5	Draft response to motion opposing defendants' request to extend deadline to answer.	575	\$287.50	Rachel Berlin
6/26/24	0.2	Team meeting re: case; discuss moving for conditional cert.	575	\$115.00	Rachel Berlin
6/26/24	0.2	Reviewed draft response in opposition to motion for extension of time by RBB.	600	\$120.00	Brian Sutherland
6/28/24	0.2	Check local rules re whether we can reply to motion for reconsideration.	575	\$115.00	Rachel Berlin

6/28/24	0.5	read Defendant's response to Motion for Reconsideration. Check local rules re whether reply is permitted.	575	\$287.50	Rachel Berlin
7/1/24	0.2	Review order re defendants' deadline to answer given Motion for reconsideration.	575	\$115.00	Rachel Berlin
7/1/24	0.1	Reviewed court's order granting time.	600	\$60.00	Brian Sutherland
7/10/24	0.2	review settlement communication from opposing counsel representing JKL w/settlement offer.	575	\$115.00	Rachel Berlin
7/10/24	0.3	Reviewed offer of settlement to Perez from Charles McKnight for JKL.	600	\$180.00	Brian Sutherland
7/12/24	0.4	read court's order on motion for reconsideration.	575	\$230.00	Rachel Berlin
7/12/24	0.4	Reviewed order denying motion for reconsideration.	600	\$240.00	Brian Sutherland
7/17/24	0.3	call with co-counsel re JKL settlement offer to plaintiff	575	\$172.50	Rachel Berlin
7/24/24	0.2	Reviewed email from Abby to Charles McKnight re: settlement offer.	600	\$120.00	Brian Sutherland
8/1/24	0.5	Reviewed answers filed by defendants.	600	\$300.00	Brian Sutherland
8/2/24	1	review Defendants' answers	575	\$575.00	Rachel Berlin
8/5/24	0.2	Email defense counsel re scheduling R26	575	\$115.00	Rachel Berlin
8/5/24	1.5	Reviewed case law re: [REDACTED] email to Chris Hall and Dan Werner re: same.	600	\$900.00	Brian Sutherland
8/6/24	0.2	emails re scheduling R26 call.	575	\$115.00	Rachel Berlin
8/7/24	0.7	team call	575	\$402.50	Rachel Berlin
8/8/24	0.2	review Judge vineyard's order re discovery	575	\$115.00	Rachel Berlin
8/8/24	0.1	Reviewed email from Abby re: JKL opt-in.	600	\$60.00	Brian Sutherland
8/9/24	0.5	Drafting JPR	575	\$287.50	Rachel Berlin
8/11/24	0.3	finalize draft JPR and circulate to team.	575	\$172.50	Rachel Berlin
8/11/24	0.5	begin drafting initial disclosures	575	\$287.50	Rachel Berlin
8/14/24	0.4	Reviewed draft JPR and Dan Werner's edits.	600	\$240.00	Brian Sutherland
8/15/24	0.4	Rule 26 conference.	575	\$230.00	Rachel Berlin
8/21/24	0.4	Discuss tasks to complete with team on zoom call.	575	\$230.00	Rachel Berlin
8/21/24	0.4	Draft list of items to request for settlement purposes.	575	\$230.00	Rachel Berlin
8/22/24	0.3	email team re items to request for settlement demand purposes.	575	\$172.50	Rachel Berlin
8/23/24	0.2	email re Marco Herrera documents	575	\$115.00	Rachel Berlin

8/23/24	0.2	Reviewed email from Chris Hall re: documents pertaining to Marco Herrera for conditional certification.	600	\$120.00	Brian Sutherland
8/23/24	0.2	Reviewed email between Shane Crary Ross and Chris Hall re: documents.	600	\$120.00	Brian Sutherland
8/26/24	0.3	review Chris hall's email re 216(b) motion and defining classes; schedule call to discuss same.	575	\$172.50	Rachel Berlin
8/26/24	0.1	follow up with team re documents requested for settlement purposes	575	\$57.50	Rachel Berlin
8/26/24	0.3	team call re 216(b) collective motion and how to arrange subclasses/declarations.	575	\$172.50	Rachel Berlin
8/27/24	0.5	email re 216b motion and new JKL potential opt-in	575	\$287.50	Rachel Berlin
8/27/24	0.3	review draft declaration for 216b motion	575	\$172.50	Rachel Berlin
8/27/24	0.1	Reviewed email from Chris Hall re: FLSA and RICO claims against JKL.	600	\$60.00	Brian Sutherland
8/28/24	0.4	Compare JPR with Defendants' additions to original version. Share thoughts with team re defendants' changes to JPR.	575	\$230.00	Rachel Berlin
8/28/24	0.2	changes to JPR and circulate to Defs	575	\$115.00	Rachel Berlin
8/28/24	0.2	draft email to Defendants requesting documents for settlement demand purposes	575	\$115.00	Rachel Berlin
8/28/24	0.1	Reviewed email from Chris Hall and RBB re: class definition.	600	\$60.00	Brian Sutherland
8/28/24	0.2	Reviewed email from RBB re: redline comparison of JPR and Dan Werner's suggestions.	600	\$120.00	Brian Sutherland
8/29/24	0.2	email defendants request for preliminary documents.	575	\$115.00	Rachel Berlin
8/29/24	0.1	email team re zoom call yesterday	575	\$57.50	Rachel Berlin
8/29/24	0.2	email defendants re JPR	575	\$115.00	Rachel Berlin
9/3/24	0.7	Revise JPR; emails with defense counsel re further changes; finalize and file with court.	575	\$402.50	Rachel Berlin
9/3/24	0.3	Reviewed email between RBB and Sarah Phaff re: edits and changes to JPRDP and various versions re: same.	600	\$180.00	Brian Sutherland
9/4/24	0.2	team call re discovery	575	\$115.00	Rachel Berlin
9/10/24	1	Draft Initial Disclosures	575	\$575.00	Rachel Berlin
9/11/24	0.3	Review scheduling order and calendar deadlines.	575	\$172.50	Rachel Berlin
9/11/24	0.3	Reviewed draft motion for conditional certification.	600	\$180.00	Brian Sutherland
9/16/24	0.2	email with team re initial disclosures due this week.	575	\$115.00	Rachel Berlin

9/16/24	0.2	Reviewed draft initial disclosures and emails between team members re: same.	600	\$120.00	Brian Sutherland
9/17/24	0.2	finalize and file Initial Disclosures.	575	\$115.00	Rachel Berlin
9/17/24	0.2	review JKL's Initial Disclosures.	575	\$115.00	Rachel Berlin
9/17/24	0.3	Review MOBIS' initial disclosures	575	\$172.50	Rachel Berlin
9/17/24	0.3	Reviewed initial disclosures by JKL and Kia.	600	\$180.00	Brian Sutherland
9/20/24	0.4	email from Dan re [REDACTED]	575	\$230.00	Rachel Berlin
9/23/24	0.5	review Dan email re [REDACTED]	575	\$287.50	Rachel Berlin
9/23/24	0.2	Reviewed email from Chris Hall and Dan Werner re: [REDACTED]	600	\$120.00	Brian Sutherland
9/24/24	0.2	email with co-counsel	575	\$115.00	Rachel Berlin
9/25/24	0.3	team call re discovery tasks in Mobis case.	575	\$172.50	Rachel Berlin
9/25/24	0.5	call with defendant's counsel Mike Lucas and Sarah Pfaff, and co-counsel Dan and Chris, re possible mediation and stay.	575	\$287.50	Rachel Berlin
9/25/24	0.2	debrief with co-counsel re call with Mobis defense counsel.	575	\$115.00	Rachel Berlin
9/30/24	0.1	Reviewed email between team members re: scheduling mediation.	600	\$60.00	Brian Sutherland
10/1/24	0.7	communications with Chris Parker re possible mediation dates. confer with team and email o/c re same.	575	\$402.50	Rachel Berlin
10/2/24	0.3	team call	575	\$172.50	Rachel Berlin
10/2/24	0.2	email re JKL opt-ins	575	\$115.00	Rachel Berlin
10/7/24	0.2	email with opposing counsel	575	\$115.00	Rachel Berlin
10/9/24	0.3	team call re discovery items and potential mediation, filing for 216b	575	\$172.50	Rachel Berlin
10/9/24	0.6	review defense counsel's email re items they're willing to produce in advance of mediation. confer with team and provide feedback, review draft response.	575	\$345.00	Rachel Berlin
10/9/24	0.3	Reviewed email between Dan Werner, Sarar Phaff re: documents required for mediation.	600	\$180.00	Brian Sutherland
10/10/24	0.2	call with BJS re [REDACTED]	575	\$115.00	Rachel Berlin

10/10/24	0.3	Respond to Defendants' proposal to produce documents in advance of mediation.	575	\$172.50	Rachel Berlin
10/10/24	0.2	Reviewed email from Chris Hall re: declaration in support of conditional certification and email between team re: same.	600	\$120.00	Brian Sutherland
10/21/24	0.2	f/u with Chris Parker re mediation dates.	575	\$115.00	Rachel Berlin
10/21/24	1.3	review 216b motion and notice and make proposed revisions to same.	575	\$747.50	Rachel Berlin
10/22/24	0.5	review final 216b motion, calendar response DL.	575	\$287.50	Rachel Berlin
10/22/24	0.1	Reviewed email from Chris Hall re: time period for class of opt-ins and responded to same.	600	\$60.00	Brian Sutherland
10/22/24	0.1	Reviewed email between team members re: scheduling mediation.	600	\$60.00	Brian Sutherland
10/23/24	0.2	follow up with defense counsel re outstanding discovery items.	575	\$115.00	Rachel Berlin
10/25/24	0.3	review Sarah Phaff's email re stay, mediation, and exchange of documents.	575	\$172.50	Rachel Berlin
10/25/24	0.3	Compile and email Chris Parker all attorney/partner information for mediation.	575	\$172.50	Rachel Berlin
10/28/24	0.2	email with Chris Parker re mediation.	575	\$115.00	Rachel Berlin
10/29/24	0.2	email opposing counsel re outstanding items.	575	\$115.00	Rachel Berlin
10/29/24	0.2	Email exchange with Sarah Phaff re mediation and stay/responding to 216b.	575	\$115.00	Rachel Berlin
10/29/24	0.3	review proposed mediation agreement and email with Chris Parker.	575	\$172.50	Rachel Berlin
10/29/24	0.1	Reviewed emails between team members re: mediation scheduling and location.	600	\$60.00	Brian Sutherland
10/31/24	0.3	emails and calls with Chris hall re how to respond to Evan Gibbs extension motion.	575	\$172.50	Rachel Berlin
10/31/24	0.7	draft joint motion to stay case and toll FLSa claims.	575	\$402.50	Rachel Berlin
11/1/24	0.3	review edits to joint motion to stay and email with co-counsel.	575	\$172.50	Rachel Berlin
11/5/24	0.2	review Defendants' revisions to joint motion to stay and C. Hall's response	575	\$115.00	Rachel Berlin
11/5/24	0.1	Reviewed CM/ECF order granting motion for extension of time to respond to motion for conditional certification.	600	\$60.00	Brian Sutherland
11/7/24	0.1	Reviewed email between opposing counsel re: documents for settlement negotiations.	600	\$60.00	Brian Sutherland
11/15/24	0.1	Reviewed order granting motion to stay.	600	\$60.00	Brian Sutherland

12/2/24	0.1	Reviewed email from RBB to opposing counsel re: request for document production.	600	\$60.00	Brian Sutherland
12/10/24	0.2	follow up with o/c re doc production.	575	\$115.00	Rachel Berlin
12/11/24	0.2	Drafted email to CBH and team re: informal discovery agreement language.	600	\$120.00	Brian Sutherland
12/11/24	0.3	review proposed confidentiality agreement for production of docs from defense counsel, with team's revisions to same.	575	\$172.50	Rachel Berlin
12/11/24	0.1	Reviewed email from Chris Hall re: changes to agreement language for settlement document production.	600	\$60.00	Brian Sutherland
12/11/24	0.1	Responded to email from Chris Hall re: changes to settlement document production agreement.	600	\$60.00	Brian Sutherland
12/16/24	0.7	review Kia's initial production of documents in advance of mediation.	575	\$402.50	Rachel Berlin
12/18/24	0.2	Team call re case status.	575	\$115.00	Rachel Berlin
1/8/25	0.2	Discuss case in team meeting	575	\$115.00	Rachel Berlin
1/10/25	0.2	email defendants re doc production status.	575	\$115.00	Rachel Berlin
1/10/25	0.3	email defendants re doc production status	575	\$172.50	Rachel Berlin
1/10/25	0.2	reach out to Jorge and Elvis re mediation dates.	575	\$115.00	Rachel Berlin
1/12/25	0.2	set up call with Evan Gibbs.	575	\$115.00	Rachel Berlin
1/13/25	0.5	Call with RBB re: status of document production for upcoming mediation.	600	\$300.00	Brian Sutherland
1/13/25	0.5	Call with BJS re: status of document production for upcoming mediation	575	\$287.50	Rachel Berlin
1/13/25	0.2	communication with Elvis and Jorge - named plaintiffs	575	\$115.00	Rachel Berlin
1/14/25	0.5	Call with Evan Gibbs re: insurance and mediation.	600	\$300.00	Brian Sutherland
1/14/25	0.5	call with Evan Gibbs and BJS re insurance/delaying mediation. Discuss with BJS.	575	\$287.50	Rachel Berlin
1/14/25	0.6	access SPJ/Allswell docs, begin reviewing and discuss damages with BJS.	575	\$345.00	Rachel Berlin
1/15/25	0.2	email Chris Parker re new dates for mediation	575	\$115.00	Rachel Berlin
1/15/25	0.5	Conference with RBB and Evan Gibbs re: insurance and mediation scheduling; call with RBB re: same afterward.	600	\$300.00	Brian Sutherland
1/16/25	2.3	Review Allswell production. Review/revise Chris Hall's letter to Evan Gibbs re deficiencies re same.	575	\$1,322.50	Rachel Berlin
1/16/25	0.3	Talk to Chris Parker re alternate mediation dates; confer with team re same.	575	\$172.50	Rachel Berlin

1/16/25	0.3	Review of draft letter re: data issues from CBH; reviewed proposed revisions by RBB; drafted email to RBB re: same.	600	\$180.00	Brian Sutherland
1/16/25	0.2	Call Evan re mediation date.	575	\$115.00	Rachel Berlin
1/16/25	0.2	Review of draft edits from Chris Hall to letter to Mobis re: documents produced for settlement.	600	\$120.00	Brian Sutherland
1/17/25	0.3	text with chris Parker re open mediation dates. email with Evan re mediation dates	575	\$172.50	Rachel Berlin
1/17/25	0.2	email team re mediation dates	575	\$115.00	Rachel Berlin
1/17/25	0.2	email w/Evan Gibbs re mediation.	575	\$115.00	Rachel Berlin
1/17/25	0.5	review Chris edits to letter to Evan/Sarah and send him missing excel sheets	575	\$287.50	Rachel Berlin
1/17/25	0.1	email from Chris Hall re: changes to letter to Evan and Sarah re: documents.	600	\$60.00	Brian Sutherland
1/20/25	0.2	email re mediation dates.	575	\$115.00	Rachel Berlin
1/20/25	0.4	finalize and send letter to Evan and Sarah re document production for mediation.	575	\$230.00	Rachel Berlin
1/21/25	0.3	emails w/team and opposing counsel re alternate mediation dates	575	\$172.50	Rachel Berlin
1/22/25	0.2	email team re possible mediation dates.	575	\$115.00	Rachel Berlin
1/22/25	0.2	email Gibbs re mediation date	575	\$115.00	Rachel Berlin
1/22/25	0.1	Reviewed email between RBB and team members re: mediation scheduling.	600	\$60.00	Brian Sutherland
1/22/25	0.2	text with chris Parker re mediation dates.	575	\$115.00	Rachel Berlin
1/24/25	0.2	review email from Evan Gibbs and respond to same.	575	\$115.00	Rachel Berlin
1/24/25	0.2	email with Chris Parker	575	\$115.00	Rachel Berlin
1/27/25	0.1	Reviewed draft joint notice from Evan Gibbs.	600	\$60.00	Brian Sutherland
1/28/25	0.3	Email with Evan Gibbs.	575	\$172.50	Rachel Berlin
1/28/25	0.2	review draft joint motion to reset mediation; circulate to team.	575	\$115.00	Rachel Berlin
1/29/25	0.3	team call	575	\$172.50	Rachel Berlin
1/30/25	0.2	review o/c edits to joint motion to extend mediation and respond to email.	575	\$115.00	Rachel Berlin
2/3/25	0.2	WhatsApp message with Jorge re mediation	575	\$115.00	Rachel Berlin
2/3/25	0.2	Message with Elvis re mediation	575	\$115.00	Rachel Berlin
2/7/25	0.1	email with Dan and Chris	575	\$57.50	Rachel Berlin
2/10/25	0.2	email opposing counsel re status of document production and response to letter.	575	\$115.00	Rachel Berlin

2/11/25	0.1	email from Sarah Phaff re status of docs.	575	\$57.50	Rachel Berlin
2/12/25	0.2	follow up with opposing counsel re doc production.	575	\$115.00	Rachel Berlin
2/12/25	0.2	Team call re case status.	575	\$115.00	Rachel Berlin
2/14/25	0.1	email with Evan Gibbs to schedule call.	575	\$57.50	Rachel Berlin
2/20/25	0.7	call with SPJ/Allswell lawyers and Mobis lawyer re document production status.	575	\$402.50	Rachel Berlin
2/21/25	0.5	Review Michael Cohen's email responding to our letter re document issues; review Chris' response and provide feedback.	575	\$287.50	Rachel Berlin
2/21/25	0.1	email with Sarah Phaff	575	\$57.50	Rachel Berlin
2/21/25	0.4	review Chris Hall's feedback on Evan and Michael's clients position re documents. Review response to them re: same.	575	\$230.00	Rachel Berlin
3/3/25	0.2	email opposing counsel re document production status.	575	\$115.00	Rachel Berlin
3/4/25	0.2	communications with Chris Parker re mediation agreement.	575	\$115.00	Rachel Berlin
3/4/25	0.8	preliminary review of additional kia documents produced.	575	\$460.00	Rachel Berlin
3/4/25	0.1	email with Michael Cohen re his client's doc supplementation	575	\$57.50	Rachel Berlin
3/4/25	0.2	text with chris Parker.	575	\$115.00	Rachel Berlin
3/5/25	0.5	Call with co-counsel re mediation.	575	\$287.50	Rachel Berlin
3/5/25	0.3	Call with Dan re: mediation.	600	\$180.00	Brian Sutherland
3/9/25	0.1	Reviewed email from Dan Werner re: Jorge's wages.	600	\$60.00	Brian Sutherland
3/13/25	0.7	access and download/save doc production from Mobis. preliminary review.	575	\$402.50	Rachel Berlin
3/13/25	0.5	Preliminary review of Kia's suppl. document production. Email with Dan re foreign languages used.	575	\$287.50	Rachel Berlin
3/13/25	0.1	email with Dan re splitting up document review.	575	\$57.50	Rachel Berlin
3/18/25	0.5	Emails with Evan re delays and confer with team re: same.	575	\$287.50	Rachel Berlin
3/20/25	0.2	Email with Evan and Michael re Allswells failure to complete document production.	575	\$115.00	Rachel Berlin
3/20/25	0.6	email from Allswell counsel re continued failure to produce documents. confer with team re same.	575	\$345.00	Rachel Berlin
3/20/25	0.2	Setup access to Everlaw	575	\$115.00	Rachel Berlin
3/21/25	0.2	Email with Dan and Brian re Defendants delay/ failure to produce information/docs.	575	\$115.00	Rachel Berlin

3/23/25	0.2	Review dan's draft email to opposing counsel	575	\$115.00	Rachel Berlin
3/26/25	0.3	Review email from Sarah Phaff and Dan's response. Confer with team re scheduling call.	575	\$172.50	Rachel Berlin
3/26/25	0.3	Email opposing counsel re status of document production. Call with team re: same.	575	\$172.50	Rachel Berlin
3/26/25	0.1	review email from Allison Hawkins	575	\$57.50	Rachel Berlin
3/27/25	0.1	email from Michael Cohen	575	\$57.50	Rachel Berlin
3/31/25	0.2	email with o/c re document production.	575	\$115.00	Rachel Berlin
3/31/25	0.3	email and texts with Chris Parker.	575	\$172.50	Rachel Berlin
4/1/25	3	review and re-sort/manipulate excel data with class member payroll information to determine number of class members for Mobis/Allswell.	575	\$1,725.00	Rachel Berlin
4/1/25	0.2	email Allison Hawkins re questions about class list. Review her response to same.	575	\$115.00	Rachel Berlin
4/2/25	0.7	Team call re mediation, document review, strategy.	575	\$402.50	Rachel Berlin
4/2/25	0.2	email opposing counsel re documents produced.	575	\$115.00	Rachel Berlin
4/2/25	0.4	Discussion during meeting re: document review.	600	\$240.00	Brian Sutherland
4/2/25	0.2	review new SCOTUS case on RICO case [REDACTED]	575	\$115.00	Rachel Berlin
4/3/25	1.2	Review Mobis document production.	575	\$690.00	Rachel Berlin
4/3/25	0.2	email with sarah phaff re kia document production.	575	\$115.00	Rachel Berlin
4/3/25	0.3	review email from Michael Cohen and questions re: same.	575	\$172.50	Rachel Berlin
4/4/25	0.1	email from Michael Cohen, access new doc production.	575	\$57.50	Rachel Berlin
4/4/25	0.1	email with team re how to code in Everlaw for document review.	575	\$57.50	Rachel Berlin
4/6/25	0.4	review Kia class information. Download Allswell new production/save.	575	\$230.00	Rachel Berlin
4/6/25	0.9	Review class member spreadsheets sorted by Dan to evaluate days worked. Combine Kia and Mobis spreadsheets so that there is one class list. Correct errors and sort. Email with team re: same.	575	\$517.50	Rachel Berlin
4/7/25	0.2	email with Dan re class size and mediation.	575	\$115.00	Rachel Berlin
4/7/25	0.3	Speak to Plaintiffs Jorge and Elvis re attending mediation.	575	\$172.50	Rachel Berlin
4/7/25	0.1	email with Chris Parker re start time for mediation.	575	\$57.50	Rachel Berlin

4/9/25	0.8	Conference call with team members re: damages, calculations, strategies for demand at mediation.	600	\$480.00	Brian Sutherland
4/10/25	0.2	email with team re claims administrator and possibly using CDM.	575	\$115.00	Rachel Berlin
4/10/25	0.1	email from Chris Parker re mediation.	575	\$57.50	Rachel Berlin
4/11/25	0.1	email from JKL counsel re FLSA claims and mediation.	575	\$57.50	Rachel Berlin
4/14/25	1.3	Review draft mediation statement and provide feedback to team re same (.5) Review Allswell contracts to assess disgorgement and compare to client paychecks to assess damages information. Share with team. (.8)	575	\$747.50	Rachel Berlin
4/14/25	3	Reviewed case law and documents produced by Defendants and drafted demand letter and email re: same to team.	600	\$1,800.00	Brian Sutherland
4/14/25	0.3	Call with Dan re damages calculations.	600	\$180.00	Brian Sutherland
4/15/25	1	Team call re damages.	575	\$575.00	Rachel Berlin
4/15/25	0.9	Review case law and emails among team re [REDACTED]	575	\$517.50	Rachel Berlin
4/15/25	0.3	review Dan's edits to demand letter.	575	\$172.50	Rachel Berlin
4/15/25	1	Team call re: damages.	600	\$600.00	Brian Sutherland
4/16/25	2.5	Review of mediation documents; drafted mediation email memo for Chris Parker.	600	\$1,500.00	Brian Sutherland
4/16/25	0.4	review Chris edits to demand letter. Email Chris re [REDACTED]	575	\$230.00	Rachel Berlin
4/16/25	0.2	review Dan's new damages spreadsheet.	575	\$115.00	Rachel Berlin
4/16/25	0.1	email team re status of document review.	575	\$57.50	Rachel Berlin
4/16/25	0.3	review Brian mediation email to Chris Parker and team's suggestions to change certain language.	575	\$172.50	Rachel Berlin
4/17/25	0.3	review email and spreadsheet information from Dan with document review analysis from Allswell/SPJ support + offer letters.	575	\$172.50	Rachel Berlin
4/17/25	0.3	email from Chris Hall + Dan Werner re strategy for mediation, email with team re same.	575	\$172.50	Rachel Berlin
4/17/25	0.1	Reviewed and responded to email from Chris Hall re: [REDACTED]	600	\$60.00	Brian Sutherland

4/17/25	0.1	Reviewed and responded to email from Dan Werner re: [REDACTED]	600	\$60.00	Brian Sutherland
4/17/25	0.1	Reviewed email from Chris Parker re: single class or mutiple; drafted email to team re: same.	600	\$60.00	Brian Sutherland
4/17/25	0.1	Reviewed email from Chris Hall re: [REDACTED].	600	\$60.00	Brian Sutherland
4/17/25	0.2	Calls with Chris Hall and Dan Werner re: demand; call to Chris Parker and left voicemail message.	600	\$120.00	Brian Sutherland
4/18/25	0.2	Texts with Dan re settlement/mediation calculations.	600	\$120.00	Brian Sutherland
4/18/25	0.2	update from Chris re conversation with Mike Lucas.	575	\$115.00	Rachel Berlin
4/18/25	0.2	review Chris' summary on RICO punitive.	575	\$115.00	Rachel Berlin
4/18/25	0.1	Reviewed and responded to email from Chris Hall re: connecting with Chris Parker and sending demand.	600	\$60.00	Brian Sutherland
4/18/25	0.1	Reviewed email from Chris Hall and Dan Werner re: reduced class size per info from Michael Lucas.	600	\$60.00	Brian Sutherland
4/18/25	0.2	Reviewed email from Chris Hall with research from Georgia Jurisprudence.	600	\$120.00	Brian Sutherland
4/20/25	0.5	prepare for mediation, review materials again	575	\$287.50	Rachel Berlin
4/21/25	11.8	Attend day 1 of mediation	575	\$6,785.00	Rachel Berlin
4/21/25	1	Drive to/from mediation.	600	\$600.00	Brian Sutherland
4/21/25	0.7	Drive to/from mediation.	575	\$402.50	Rachel Berlin
4/22/25	11.8	Attend day 2 of mediation.	575	\$6,785.00	Rachel Berlin
4/22/25	1	Drive to/from mediation.	600	\$600.00	Brian Sutherland
4/22/25	0.7	Drive to/from mediation.	575	\$402.50	Rachel Berlin
4/23/25	0.3	review term sheet and discuss via email with team.	575	\$172.50	Rachel Berlin
4/23/25	11.8	Attended mediation conference at Troutman Sanders.	600	\$7,080.00	Brian Sutherland
4/23/25	11.8	Attended mediation conference at Troutman Sanders.	600	\$7,080.00	Brian Sutherland
4/23/25	0.1	Reviewed email term sheet from Chris Parker; drafted email to team re: same.	600	\$60.00	Brian Sutherland
4/23/25	0.1	Reviewed email from Julie Solorzano re: changes to the term sheet and drafted revisions to all counsel.	600	\$60.00	Brian Sutherland
4/23/25	0.2	Reviewed email from Sarah Phaff re: changes to term sheet and drafted email to team re: same.	600	\$120.00	Brian Sutherland

4/23/25	0.1	Reviewed email from Dan Werner and Julie Solorzano re: changes by Sarah Phaff.	600	\$60.00	Brian Sutherland
4/23/25	0.1	Drafted email to team re: catching up with Parker re: punitive damages; drafted email to team re: same.	600	\$60.00	Brian Sutherland
4/23/25	0.7	Call with Chris Parker re: punitive damages issue; researched law re: personal injury recoverability under state and federal RICO; drafted email to team re: same.	600	\$420.00	Brian Sutherland
4/23/25	0.1	Reviewed email from Chris Hall re: settlement, drafted email with questions re: same.	600	\$60.00	Brian Sutherland
4/23/25	0.1	Reviewed and responded to email from Chris Hall regarding punitive damages language in settlement.	600	\$60.00	Brian Sutherland
4/24/25	0.3	Communications with Chris Parker re JKL settlement.	575	\$172.50	Rachel Berlin
4/24/25	0.3	Team emails re settlement terms.	575	\$172.50	Rachel Berlin
4/25/25	0.1	Share time entries with co-counsel.	575	\$57.50	Rachel Berlin
7/22/25	0.4	call with opposing counsel and co-counsel re settlement.	575	\$230.00	Rachel Berlin
7/23/25	0.3	call with Chris Hall and send him Kia doc production.	575	\$172.50	Rachel Berlin
7/30/25	0.3	team call re settlement and next steps	575	\$172.50	Rachel Berlin
8/1/25	0.4	review class data	575	\$230.00	Rachel Berlin
8/6/25	0.2	team call re status of settlement	575	\$115.00	Rachel Berlin
8/13/25	0.5	team call re settlement and logistics.	575	\$287.50	Rachel Berlin
8/27/25	0.3	Team meeting re settlement	575	\$172.50	Rachel Berlin
9/24/25	0.2	team call re settlement	575	\$115.00	Rachel Berlin
10/10/25	0.2	team meeting re settlement.	575	\$115.00	Rachel Berlin
3/18/26	0.5	team call re: class members reaching out and how to handle responding to inquiries.	575	\$287.50	Rachel Berlin
Total hours:	479.7		Total time:	\$280,477.50	



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 Atlanta, GA 30326
 Phone: 678-439-0330
 Email: accountspayable@beal.law

INVOICE

Invoice # 1327
 Date: 04/24/2026

Jorge Oswaldo Martinez

Type	Date	Notes	Quantity	Rate	Total
Expense	02/15/2023	Billable Expense Income: Translation service	1.00	\$250.00	\$250.00
Expense	07/17/2023	Billable Expense Income: Pro hac vice fee for CDM	1.00	\$150.00	\$150.00
Expense	02/13/2024	Billable Expense Income: Translation Services	1.00	\$187.50	\$187.50
				Subtotal	\$587.50
				Total	\$587.50

Statement of Account

Outstanding Balance	New Charges	Amount in Trust	Payments Received	Total Amount Outstanding
(\$0.00	+ \$587.50)- (\$0.00	+ \$0.00	= \$587.50

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1327	04/24/2026	\$587.50	\$0.00	\$587.50
			Outstanding Balance	\$587.50
			Amount in Trust	\$0.00
			Total Amount Outstanding	\$587.50

Please make all amounts payable to: Beal, Sutherland, Berlin & Brown

To make a payment online, you may do so here:

<https://secure.lawpay.com/pages/bealsutherlandberlinandbrown/operating>

Payment is due upon receipt.