

IN THE UNITED STATES DISTRICT COURT  
FOR THE 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, and	)	
LUIS ADRIAN SALAZAR LOZANO,	)	
VERONICA OLAN CASTILLO, and	)	
AARON HERNAN PEREZ	)	
SALAZAR, individually and on	)	
behalf of all others similarly situated,	)	Case No. 3:22-cv-00145-LMM
	)	
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; and	)	
JOB KNOWLEDGE, LLC,	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF CHRISTOPHER B. HALL IN SUPPORT OF MOTION FOR  
ATTORNEYS' FEES AND COSTS**

1. My name is Christopher B. Hall.
2. I am over the age of 18 and make this declaration voluntarily.
3. I am a partner at the law firm Hall & Lampros, LLP.
4. I am one of the counsel representing plaintiffs in this lawsuit.
5. Plaintiff Martinez filed this lawsuit on August 11, 2022. Doc. 1.
6. The parties engaged in extensive pre-mediation informal discovery, including the production of approximately 2,500 pages of documents and spreadsheets relating to Plaintiffs' claims.
7. The discovery included production of relevant documents, emails from identified custodians, and extensive recruitment, visa processing, payroll, and employment data.
8. Plaintiffs analyzed multiple permutations of class certification, individual trial, class trial, and damages outcomes, and Plaintiffs provided a detailed demand. The parties submitted mediation statements to Mr. Parker.
9. On April 21-22, 2025, the parties attended a two-day mediation conducted by Mr. Parker and reached a tentative settlement in principle at approximately 9:00 p.m. on the second day.
10. The parties negotiated a detailed term sheet, Settlement Agreement, distribution plan, and notice documents, over the following weeks.

11. The Settlement Agreement provides relief for the classes identified in the lawsuit and described below, which classes are agreed to for purposes of settlement only and for no other purpose pursuant to 29 U.S.C. § 216(b) or Federal Rule of Civil Procedure 23(b)(3).

12. Negotiation of final settlement papers was delayed due to the number of parties (including interested insurers), complexities relating to distribution to international class members, and the process of identifying class members and the dates they worked before settlement finalization (which depended on cross-referencing payroll and attendance data from multiple parties). There were issues relating to which parties had (often international) contact information relating to class members, and identification of same. And before agreeing on procedures for identification of class members, Class Counsel had to assure themselves that such procedures in fact were sufficient. This process was very time consuming. The parties cooperated during this endeavor and were able to resolve these issues with substantial (but time consuming) effort.

13. All class members, and their dates worked, were needed on the front-end for purposes of allocating settlement funds in this complex case.

14. Collectively, the following classes are referred to as the "Settlement Class."

**FLSA Collective Action Class:**

All individuals who, between August 11, 2019 and the present, (1) were recruited by TESS, SPJ, or Allswell, (2) were assigned by Allswell to work at Defendant Kia Georgia's or Defendant Mobis' West Point, Georgia locations, (3) received wages from Allswell; and (4) were TN visa holders.

**Rule 23 Class:**

All individuals who, between August 11, 2018 and the present, (1) were recruited by TESS, JKL, SPJ, or Allswell, (2) were assigned by Allswell to work at Defendant Kia Georgia's or Defendant Mobis' West Point, Georgia locations, (3) received wages from Allswell or JKL; and (4) were TN visa holders.

Settlement Agreement ("SA"), ¶ III.9.

15. The parties agreed that there are (including the named Plaintiffs) approximately 614 members of the FLSA Collective and the Rule 23 Class (collectively, the "Settlement Class Members"). *Id.*

16. **Gross Settlement Fund.** Subject to final court approval, Class Counsel has secured a settlement of Plaintiffs' claims on a class wide basis for \$11,500,000.00 (the "Gross Settlement Fund") inclusive of all attorney's fees, expenses and costs as discussed below. SA, ¶ III.17.2. If the Court approves Class Counsel's request for attorneys' fees, each Settlement Class Member who provides information confirming that they have not received Medicare benefits and providing the information required by the Long Form Notice Settlement Notice,

including where and how to send payment, will receive monetary compensation.

*Id.* ¶¶ III.11.1, 28.

17. The Settlement Agreement is not a claims-made settlement. It instead provides relief to all Settlement Class Members without need for them to submit a claim. *Id.* ¶¶ III.11.1, 28.

18. The Settlement Agreement is non-reversionary. The non-reversionary settlement fund provides that the funds will be paid to all Settlement Class Members without regard or need for them to submit a claim. *Id.* Excess funds that cannot be distributed or checks that are not negotiated by Settlement Class Members (*cy pres* funds) will be donated to Georgia Legal Services, Inc., a 501(c)(3) non-profit organization generally serving the interests of the Class. SA, ¶ III.17.11.

19. The Settlement Agreement provides substantial economic benefit relating to uncertain claims. The economic benefit provided to all Settlement Class Members is substantial. *Id.* ¶ III.4. At issue throughout the case and in negotiations was the uncertain nature of Plaintiffs' RICO claims, potential defenses to class certification, potential defenses to some of Plaintiffs' theories of damages, litigation expenses for such complex litigation, and necessary delays for trial and potential appeals.

20. Defendants agree that the Administrator will pay from the common settlement fund, in addition to other consideration outlined herein to the

Settlement Class Members and Collective Members, attorney's fees and expenses to Class Counsel and Defendants will not oppose or object to Class Counsel's application for all attorneys' fees, costs and expenses in an amount of \$3,450,000.00, subject to Court approval. (SA, ¶ III.27.1). The Agreement with respect to attorneys' fees, costs and expenses was negotiated after the substantive terms of the settlement and was negotiated and agreed upon with representative Plaintiffs' participation during the mediation.

21. I have been licensed to practice law in the State of Georgia since 1996.

22. This declaration is submitted in support of Plaintiffs' Unopposed Motion for Attorneys' Fees and Costs.

23. Lawyers at Hall & Lampros make a deliberate effort not to duplicate efforts and to be efficient, which is especially important because the firm only takes cases on a contingency basis. Attached hereto as exhibit 1 are the time records for Hall & Lampros lawyer Christopher B. Hall.

24. Lawyers Gordon Van Remmen (2015 law graduate) and Ricardo Gilb (2020 law graduate) also worked in this case.

25. Hall & Lampros lawyers kept records of these hours contemporaneously and they are true and correct. Hall & Lampros lawyers exercised billing judgment and did not bill all of the time that they spent in the matter, including time reviewing pleadings and other case documents. The

lodestar which is reflected in the time records for Hall & Lampros lawyers is: \$351,075.00.

26. A list of the primary lawyers and their associated lodestar is set out in the below table. Please note that Hall & Lampros lodestar includes work by Brian Sutherland and Rachel Berlin Benjamin from when they were employees of Hall & Lampros. Such time is not duplicative of their lodestar submissions, which includes only their post-Hall & Lampros time.

<b>Timekeeper</b>	<b>Position</b>	<b>Bar Admission Date</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate (\$)</b>	<b>Total (\$)</b>
Chris Hall	Partner	1996	Hall & Lampros	338.3	750.00	258,375.00
Brian Sutherland	Partner	2006	Hall & Lampros	44.4	600.00	26,640.00
Rachel Berlin Benjamin	Partner	2010	Hall & Lampros	91.8	600.00	52,785.00
Gordon Van Remmen	Partner	2015	Hall & Lampros	10.7	450.00	4,815.00
Ricardo Gilb	Associate	2020	Hall & Lampros	28.2	300.00	8,460.00
<b>Total</b>						<b>\$351,075.00</b>

27. Mr. Sutherland and Ms. Berlin Benjamin submit separate time entries for the time on the case at Beal, Sutherland, Berlin & Brown, which is the firm they started after leaving Hall & Lampros.

28. Hall & Lampros did not charge for paralegal or law clerk time even though multiple paralegals and law clerks worked on the matter.

29. I expect to expend additional time preparing for the fairness hearing and during class administration. That time is not included here.

30. My hourly rate of \$750.00 is reasonable and commensurate with rates charged by lawyers with similar experience for similar complex work in Atlanta and the Northern District of Georgia. I have had higher rates approved in other class action cases. The Court in *Ewing v. GEICO Indemnity Co. et al.*, No. 5:20-cv-00165-MTT (M.D. Ga.) (Doc. 204, June 10, 2024) recently approved a \$750.00 hourly rate for me in an insurance-based class action. In *Roth v. GEICO General Ins. Co.*, No. 16-62942 (S.D. Fla.) (Fort Lauderdale Division), the court (at Doc. 333) approved the magistrate's report and recommendation (Doc. 328) awarding the fees based on an hourly rate of \$750 per hour for legal work performed by me in the years 2016-2019. The *Roth* fee award was later vacated only at the request of plaintiffs and defendants pursuant to a global settlement of cases, including separate agreements on fees. In *Jones v. GEICO General Ins. Co.*, 6:17-cv-00891 (M.D. Fla.) (Orlando Division) the court (Doc. 215 at ¶ 53) approved an hourly rate of \$750.00 per hour for me that was submitted by declaration supporting the motion for attorneys' fees (Doc. 210-2) for legal work performed in the years 2017-2020.

31. My \$750.00 hourly rate is commensurate with the rates of other lawyers in this district and division. *Pinon v. Daimler AG*, No. 1:18-CV-3984-MHC, 2021 WL 6285941, at \*19 (N.D. Ga. Nov. 30, 2021), *aff'd sub nom. Ponzio*

*v. Pinon*, 87 F.4th 487 (11th Cir. 2023) (approving the following rate in a product defect class action: “for partner attorneys with over 30 years of experience, \$894 per hour; for partner attorneys with 11-30 years of experience, \$742 per hour; for partner attorneys and associate attorneys with 8-10 years of experience, \$658 per hour”); *In re Equifax Inc. Customer Data Security Breach Litig.*, No. 1:17-md-2800-TWT, 2020 WL 256132, at \*39 (N.D. Ga. Mar. 17, 2020) (finding hourly rates of more than \$1,000 for counsel reasonable and noting that prevailing rates for complex litigation in Atlanta and around the country are commensurate with or even in excess of those hourly rates); *In re S. Co. Shareholder Derivative Litig.*, No. 1:17-CV-725-MHC, 2022 WL 4545614, at \*12 (N.D. Ga. June 9, 2022) (approving partner rates of \$875.00 to \$1,100.00 in securities class action); *MiMedx Group, Inc. S'holder Derivative Litig.*, No. 1:18-cv-04486-WMR (N.D. Ga.) (approving similar hourly rates).

### **Christopher B. Hall’s Experience**

32. I am a founding partner of Hall & Lampros and have extensive experience successfully litigating class actions and FLSA collective actions, including cases similar to the present case. I graduated from the University of

Virginia in 1991, and the University of Georgia School of Law in 1996. I have been a member in good standing of the State Bar of Georgia since 1996.

33. My practice focuses on complex litigation, including extensive practice in class action litigation.

34. I have served as class counsel in the similar matter *Peregrina v. SL Alabama, LLC, et al.*, No. 3:23-CV-00206-TCB-RGV (N.D. Ga. 2023), a complex RICO class action on behalf of TN visa workers from Mexico involving similar allegations as this case.

35. I have served as class counsel on over a dozen other class actions including, *Blessing v. Sirius XM Radio, Inc.*, No. 1:09-cv-10035 (S.D.N.Y.) (antitrust class action against Sirius XM, in which I developed the theory of the case); *Roth v. GEICO*, Case No. 16-cv- 62942-WPD (S.D. Fla., filed 2016), a case in which final judgment was entered in favor of a certified class of 3,677 members, and which was the first total-loss case concerning leased vehicles to claim sales tax and the first one to allege it was a breach of contract to fail to pay title transfer fees as part of ACV; *Joffe v. GEICO Indemnity Co.*, No. 18-cv-61361-WPD (S.D. Fla.) (consolidated for settlement with Roth and involving over 8,000 class members); *Jones v. Geico*, Case No.: 6:17-cv-891-Orl-40KRS (M.D. Fla., filed 2017), in which summary judgment was entered in favor of a certified class of over 220,000 total-loss insureds for GEICO's failure to pay title and tag transfer fees after a total-loss

(and the case subsequently settled and final approval and judgment was granted in July, 2020); *Ewing v. GEICO*, 5:20-cv-00165-MTT (M.D. Ga.) (31,000 class members); *Black v. USAA*, 1:21-cv-01363-LMM (N.D. Ga.) (10,000 class members); *Bastian v. United Services Automobile Association, et al.*, No. 3:13-cv-01454-TJC-MCR (M.D. Fla.) (50,000 class members). I also have successfully prosecuted approximately five national and state FLSA collective actions.

36. Mr. Sutherland and Ms. Berlin Benjamin submit their experience by separate declaration.

37. Mr. Van Remmen is a 2015 graduate of the University of Georgia School of Law. He has significant experience working on class actions, including the *Roth*, *Ewing*, *Black*, *Joffe* matters.

38. Mr. Gilb is a 2020 graduate of the University of Texas School of Law, who worked on complex litigation matters, including class actions, with Mr. Hall.

39. My law firm, Hall & Lampros, has the resources to prosecute class claims against well-heeled defendants and their insurers. I personally have taken class actions right up to trial and spent significant sums prosecuting cases on behalf of class members. Hall & Lampros and I have taken many cases to trial.

40. I declare under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.

Dated 4/29/26

/s/Christopher B. Hall  
Christopher B. Hall

### Hyundai Mobis — Time Entries

Date	User	Rate/Cost	Time	Total	Case Link	Description
8/10/2022	Christopher B. Hall	750	2.6	\$1,950.00	Hyundai Mobis	research RICO and review [redact case name] 11th circuit cases and [redact case name] and email w co counsel; review complaint generally; 2.6
8/11/2022	Christopher B. Hall	750	3.9	\$2,925.00	Hyundai Mobis	review complaint and identify outstanding questions for client and memo to co counsel re same; emails w co counsel re class definition issues x 4; and further revise complaint; 3.9
8/15/2022	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	review Jorge doc showing employment advertisement for Hundai position
8/16/2022	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	emails w co counsel re mandatory overtime; .2
8/22/2022	Christopher B. Hall	750	1.5	\$1,125.00	Hyundai Mobis	memo/email to co counsel re title vii and 1981 for mandatory ot and staffing/non-staffing issues and general research re same; 1.5
8/31/2022	Christopher B. Hall	750	1.6	\$1,200.00	Hyundai Mobis	research re [redact caselaw name] case and other FLSA visa caselaw; 1.6
9/1/2022	Christopher B. Hall	750	2.3	\$1,725.00	Hyundai Mobis	research RICO pleading requirements and visa fraud cases and Guzman and Gruz cases; 2.3
9/20/2022	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	emails w co counsel re local rule 23.1 and strategy re same; .2
9/22/2022	Christopher B. Hall	750	0.3	\$225.00	Hyundai Mobis	conf w opposing counsel; .2 emails between counsel; .1
9/30/2022	Christopher B. Hall	750	0.3	\$225.00	Hyundai Mobis	review Reuters inquiry and links and research further
10/2/2022	Christopher B. Hall	750	0.3	\$225.00	Hyundai Mobis	emails w co counsel re media issues and responding to media; .3
10/4/2022	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	research TESS and email co counsel re TESS; .2
10/5/2022	Christopher B. Hall	750	1.4	\$1,050.00	Hyundai Mobis	review Elvis docs (rec'd from Rachel); .3 review Aquino docs from Rachel (.3); revise Morales and Salazar and Zapata docs; .8
10/6/2022	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	emails re added plaintiff
10/17/2022	Christopher B. Hall	750	1.4	\$1,050.00	Hyundai Mobis	Meet w Rachel and Brian re strategy; .2 detailed review of Mobis motion to dismiss and cases cited; 1.2
10/18/2022	Christopher B. Hall	750	0.9	\$675.00	Hyundai Mobis	emails re right to sue; .1 review SPJ motion to dismiss and cases; .8
10/19/2022	Christopher B. Hall	750	0.6	\$450.00	Hyundai Mobis	review client docs; .6
10/20/2022	Christopher B. Hall	750	3.6	\$2,700.00	Hyundai Mobis	detailed review of claimant docs and identify missing info and request to co counsel for info; prepare claim review spreadsheet; follow up emails w co counsel re client docs and client spreadsheet; 3.6
10/21/2022	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	emails w co counsel re claims analysis; .3
10/24/2022	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	email from opposing counsel re rule 26; .1 email w co counsel re same; .1 review Elvis added docs; .2
10/26/2022	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	review mot extend discovery; .1
10/28/2022	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	review amended compliant and discuss w co counsel and revise only para 49; .1
10/31/2022	Christopher B. Hall	750	1.5	\$1,125.00	Hyundai Mobis	Revise complaint; 1.3 email co counsel re outline of facts section to follow for each claimant; .2
11/1/2022	Christopher B. Hall	750	0.8	\$600.00	Hyundai Mobis	Revise amended complaint; .8
11/2/2022	Christopher B. Hall	750	5.4	\$4,050.00	Hyundai Mobis	Meet w co counsel re zoom; .4 Review amended complaint; 5
11/3/2022	Christopher B. Hall	750	3	\$2,250.00	Hyundai Mobis	Revise amended complaint; 2.5 Emails w co counsel re strategy; .5
11/4/2022	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	revise Georgia RICO claim of amended complaint; .3 draft section re continuity; .1
11/7/2022	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	emails re publicity re filing; .1

Date	User	Rate/Cost	Time	Total	Case Link	Description
11/14/2022	Christopher B. Hall	750	0.5	\$375.00	Hyundai Mobis	Conf w Rachel and Brian re settlement issue raised by Allswell counsel and discuss strategy re same; .2 email from co counsel re JKL and research re same; .3
11/16/2022	Christopher B. Hall	750	0.3	\$225.00	Hyundai Mobis	email from co counsel re extension for SAC and review draft motion to extend; .1; review email from Botts re [redact]; .1 review email from Werner re sac; .1
12/1/2022	Christopher B. Hall	750	0.7	\$525.00	Hyundai Mobis	Revise settlement talking points; .3 Tc w Rachel re settlement issues; .2 Texts w Rachel re cy pres; .1 Review emails from co counsel; .1
12/2/2022	Christopher B. Hall	750	1	\$750.00	Hyundai Mobis	emails x 8 w co counsel re strategy; .3 review tax subsidies false claims act issue; .7
12/14/2022	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	review and approve FLSA consent; .1
12/15/2022	Christopher B. Hall	750	0.9	\$675.00	Hyundai Mobis	review first part of SAC and revise; .4 review remaining complaint; .5
12/22/2022	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	review and revise opposing to motion to exceed page limits; .4
12/23/2022	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	review communication from chambers re page limits and emails w co counsel re same; .2
1/22/2023	Christopher B. Hall	750	0.3	\$225.00	Hyundai Mobis	review and revise opposing to motion to exceed page limits; .3
1/23/2023	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	review emails from chambers and co counsel re page limits and respond to co counsel; .1
2/3/2023	Christopher B. Hall	750	1.6	\$1,200.00	Hyundai Mobis	Review Mobis motion to dismiss and make notes and review new cases cites; 1.6
2/6/2023	Christopher B. Hall	750	1.2	\$900.00	Hyundai Mobis	review SPJ motion to dismiss and new cases; 1.2
2/7/2023	Christopher B. Hall	750	1.9	\$1,425.00	Hyundai Mobis	Review motion to dismiss outline and defense arguments in prep for co counsel call; .3 Tc w co counsel re motion to dismiss; .5 post tc detailed review of motion to dismiss; 1.1
2/15/2023	Christopher B. Hall	750	1.2	\$900.00	Hyundai Mobis	research re response to motion to dismiss; 1.2
2/17/2023	Christopher B. Hall	750	2	\$1,500.00	Hyundai Mobis	Research re class claims issues in motion to dismiss; 1.6 Outline response issues; .4
2/18/2023	Christopher B. Hall	750	1.8	\$1,350.00	Hyundai Mobis	research re motion to dismiss and draft section of response to motion to dismiss; 1.8
2/20/2023	Christopher B. Hall	750	3.6	\$2,700.00	Hyundai Mobis	Research re motion to dismiss; .5 Distinguish each case cited by defs in support of dismissing class allegations; 1.8 Draft response to motion to dismiss class allegations; 1.3
2/21/2023	Christopher B. Hall	750	0.8	\$600.00	Hyundai Mobis	research re motion to dismiss and revise draft re pari dilicto; .8
2/23/2023	Christopher B. Hall	750	6.4	\$4,800.00	Hyundai Mobis	Draft response to motion to dismiss class allegations pari dilicto including research on all cases cited and distinguishing; 2.7 Revise resp to motion to dismiss on breach of contract including research; 1.8 Revise resp to motion to dismiss on vagueness; 1.1 Research leave to amend class definitions and draft insert re same; .8
2/27/2023	Christopher B. Hall	750	2.5	\$1,875.00	Hyundai Mobis	revise response to motion to dismiss sections for hyundai and Allswell; 2.5
3/1/2023	Christopher B. Hall	750	1.1	\$825.00	Hyundai Mobis	review and finalize sections for response motion to dismiss; .4 email to co counsel re motion; .2 review brief sections re tax fraud and extraterritoriality; .3 emails w co counsel re briefing; .2
3/2/2023	Christopher B. Hall	750	0.6	\$450.00	Hyundai Mobis	review Job Knowledge motion to dismiss; .6
3/3/2023	Christopher B. Hall	750	5.8	\$4,350.00	Hyundai Mobis	Draft motion to amend and research re prejudice and undue delay; 2.4 Revise class allegations sections for Mobis and Allswell briefs; 1.5 Multiple emails w co counsel re motion to dismiss issues x 8; .8 Research on multiple writings forming contract and email co counsel re same; .6 Research formation of employment contract; .5
3/10/2023	Christopher B. Hall	750	2.1	\$1,575.00	Hyundai Mobis	Review briefs on motion to dismiss; .9 review case documents and Draft insert relating to support letters and Mobis contracts with staffing companies; .8 Tc w Brian re briefs; .2 Emails w co counsel re briefs; .2
3/19/2023	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	review TAC; 1.2 email co counsel re class definitions; .1
3/20/2023	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	emails w co counsele re class definitions; .2

Date	User	Rate/Cost	Time	Total	Case Link	Description
3/22/2023	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	review Perez position statement; .1
4/10/2023	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	review opposing to motion to stay; .1
5/8/2023	Christopher B. Hall	750	5.1	\$3,825.00	Hyundai Mobis	Review Allswell motion to dismiss; 1.0 draft resp re lost opportunity and class allegations; 1.7 Review Mobis motion to dismiss; 1.1 and draft resp re lost opposing and class allegations;1.3
5/9/2023	Christopher B. Hall	750	1.3	\$975.00	Hyundai Mobis	review TESS motion to dismiss; .6 review JKL motion to dismiss; .7
5/10/2023	Christopher B. Hall	750	0.3	\$225.00	Hyundai Mobis	review [redact caselaw] and [redact caselaw] cases and email memo to file re same; .3
5/11/2023	Christopher B. Hall	750	1.4	\$1,050.00	Hyundai Mobis	review spj motion to dismiss; .6 review KIA motion to dismiss; .8
5/15/2023	Christopher B. Hall	750	2.5	\$1,875.00	Hyundai Mobis	revise response to motion to dismiss TAC; 2.5
5/17/2023	Christopher B. Hall	750	1.1	\$825.00	Hyundai Mobis	revise response to motion to dismiss tax; 1.1
5/19/2023	Christopher B. Hall	750	1.6	\$1,200.00	Hyundai Mobis	Review and revise response to Allswell motion to dismiss; .5 Review response to Mobis motion to dismiss; .5 communicate w co counsel re overlap between RICO and FLSA on travelo and housing issues; .3 revise response to tac; .3
5/23/2023	Christopher B. Hall	750	1.7	\$1,275.00	Hyundai Mobis	Draft response to mot dismiss class allegations re Perez and JKL; .6 Review mot dismiss class allegations by KIA and research issues and key case law; 1.1
6/5/2023	Christopher B. Hall	750	0.8	\$600.00	Hyundai Mobis	draft insert response to KIA motion to dismiss; .8
8/16/2023	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	email co counsel re Mobis comparator; .1
9/14/2023	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	review eeoc comms and emails w co counsel re same;.1
12/21/2023	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	email from opposing counsel and recommendation to co counsel and emails from co counsel and then recommendation of options to co counsel; .4
12/22/2023	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	emails w co counsel re supp briefing; .1
1/2/2024	Christopher B. Hall	750	0.8	\$600.00	Hyundai Mobis	review R&R; .8
1/3/2024	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	Tc w co counsel re order and appealing magistrate r and r and strategy; .4
1/4/2024	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	emails w co counsel re strategy; .2
1/5/2024	Christopher B. Hall	750	1.1	\$825.00	Hyundai Mobis	Review request for extra pages and time to object to r and r and emails w co counsel; .3 Draft revised conditional cert class definition; .5 Emails w co counsel re conditional cert and revise email to opposing counsel; .3
1/8/2024	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	emails re conditional cert w co counsel; .2
1/9/2024	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	emails re supp briefing; .1review motion for extension of time; .1
1/11/2024	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	email opposing counsel re cond cert; .1
1/19/2024	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	detailed email from opposing counsel re refusal to consent to cond cert; .2
2/8/2024	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	emails w co counsel re current unhappy Mobis worker; .1
2/9/2024	Christopher B. Hall	750	1.7	\$1,275.00	Hyundai Mobis	review and revise objections to RR; 1.5 emails w co counsel re objections to file; .2
2/12/2024	Christopher B. Hall	750	1.2	\$900.00	Hyundai Mobis	review JKL objections to rr; .4 review Mobis objections to rr; .5 review TESS objection to rr; .3
2/13/2024	Christopher B. Hall	750	0.9	\$675.00	Hyundai Mobis	review spj objections to rr; .5; review KIA objections to rr; .4
2/14/2024	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	emails re mexican consulate complaint; .1
2/16/2024	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	emails re extension to file response to objections; .1
2/21/2024	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	email from Brian re assignments re objections to rr

Date	User	Rate/Cost	Time	Total	Case Link	Description
2/28/2024	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	tc w dan re assignments; email co counsel re changes in assignments; .4
2/29/2024	Christopher B. Hall	750	3.1	\$2,325.00	Hyundai Mobis	Review objections to rr and research new cases cited by KIA and start outlining response to KIA; 2.8 memo re RICO proximate cause review; .3
3/12/2024	Christopher B. Hall	750	3.9	\$2,925.00	Hyundai Mobis	draft proximate cause section for Mobis brief; 1.3 draft RICO standing section for KIA; 2.1 emails w dan re RICO misrepresentations re wage claims and detailed arguments re same; .5
3/13/2024	Christopher B. Hall	750	4.1	\$3,075.00	Hyundai Mobis	final revision to KIA section; .8 final revisions and add Mobis sections to brief; 2.8 research and email dan re contradictory wage claim by allswel and prior briefing; .5
3/14/2024	Christopher B. Hall	750	6.4	\$4,800.00	Hyundai Mobis	extensive revisions to all briefing; 6.4
4/12/2024	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	review statement of interest from eeoc and emails from counsel; .2
5/29/2024	Christopher B. Hall	750	2.8	\$2,100.00	Hyundai Mobis	Read order on dismissal in detail; .7 Research enterprise issues; 1.7 Tc w co counsel on strategy; .4
6/3/2024	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	review order to decide options and email re strategy to co counsel; .4
6/5/2024	Christopher B. Hall	750	0.6	\$450.00	Hyundai Mobis	review detailed analysis of batten order on RR by Dan and another by Brian and draft my thoughts for co counsel on our options; .6
6/7/2024	Christopher B. Hall	750	0.3	\$225.00	Hyundai Mobis	review motion for reconsideration and review [redact caselaw]; .3
6/18/2024	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	Email co counsel re Job knowledge and TESS issues in dismissal order; .2
6/27/2024	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	review spj response to motion to consideration; .2
7/11/2024	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	review order denying motion for reconsideration; .2
8/2/2024	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	emails re next steps w counsel; .1
8/5/2024	Christopher B. Hall	750	0.6	\$450.00	Hyundai Mobis	review [redact] case and [redact] case and email about chance to win on class cert; .6
8/19/2024	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	review and revise initial draft for cond cert; .4
8/22/2024	Christopher B. Hall	750	3.7	\$2,775.00	Hyundai Mobis	Revise substantially the motion for conditional certification; 3.7
8/23/2024	Christopher B. Hall	750	5	\$3,750.00	Hyundai Mobis	Revise motion for conditional certification; 3.9 Detailed email to co counsel re class definition options; .6 email co counsel re fact specific info; .5
8/26/2024	Christopher B. Hall	750	0.8	\$600.00	Hyundai Mobis	detailed email to co counsele re info we need from clients for cond cert motion; .2 draft declaration in supp condition cert motion; .6
8/27/2024	Christopher B. Hall	750	0.9	\$675.00	Hyundai Mobis	Review detailed email and notes from co counsel re herrera interview; .2 Revise draft declaration in support of motion for conditional certification; .3 Email co counsel re declarations; .1 Review Herrera and Perez client docs; .1 Detailed email to co counsele re JKL options for RICO claims and conditional cert; .2
8/28/2024	Christopher B. Hall	750	1.3	\$975.00	Hyundai Mobis	Tc w co counsele re strategy w JKL and RICO and conditional cert; .5 Revise motion for conditional certification; .8
9/3/2024	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	review joint prelim plan report
9/10/2024	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	rev scheduling order and comm from court;
9/11/2024	Christopher B. Hall	750	1.3	\$975.00	Hyundai Mobis	rev motion for cond cert; 1.0 detailed email to co counsel re isseus between KIA and hyundai re work assignments and overlap; .3
9/17/2024	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	review Mobis and KIA initial discl
9/20/2024	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	detailed email from dan re mediation;
9/23/2024	Christopher B. Hall	750	1.7	\$1,275.00	Hyundai Mobis	Email rachel re motion for conditional cert; .1 Research re putative class member tolling agreements; 1.4 Email team re tolling agreements and settlement posture for Mobis; .1 Review settlement posture email re mediation from dan; .1

Date	User	Rate/Cost	Time	Total	Case Link	Description
9/30/2024	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	emails re mediation dates
10/3/2024	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	review JKL worker days and stretegy emails w co counsel;
10/9/2024	Christopher B. Hall	750	1.2	\$900.00	Hyundai Mobis	Tc w co counsel re strategy on conditional certification and settlement negotiations and stay and mediation; .3 Review glovis counsel email re document production pursuant to settlement discussions; .1 Draft response to glovis email and send to co counsel; .2 Review dan changes and incorporate and re send to co counsel; .2 Revise conditional cert declaration for Allswell only motion; .3 Email co counsele re revised declaration and conditional cert motion; .1
10/10/2024	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	emails w co counsel re strategy; .2
10/16/2024	Christopher B. Hall	750	0.8	\$600.00	Hyundai Mobis	Tc w Dan re strategy for conditional cert and settlement; .2 Review declaration of claimants and whatsapp images; .2 Revise motion for conditional certification; .4
10/21/2024	Christopher B. Hall	750	2.7	\$2,025.00	Hyundai Mobis	Review and revise brief in supp conditional cert; 1.3 Draft motion for cond cert; .4 Draft KIA and Hyundai notices for conditional cert; 1.0
10/22/2024	Christopher B. Hall	750	2.8	\$2,100.00	Hyundai Mobis	Review rachel and ricardo changes to briefs and notice; .1 Revise notices to hyundai and KIA substantially; 1 Revise and finalize brief; 1.6 Emails w counsel re class dates; .2 Research re class dates and dates for notice; .5 Trouble filing motion due to adobe docusign and scan declarations and file; .3
10/25/2024	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	emails re mediation; .1
10/29/2024	Christopher B. Hall	750	0.3	\$225.00	Hyundai Mobis	review emails from opposing counsele and draft email to opposing counsele and emails w co counsel re strategy; .3
10/31/2024	Christopher B. Hall	750	0.7	\$525.00	Hyundai Mobis	review draft motion for extension from opposing counsel; .2 tc w co counsel re response x 2; .2 draft detailed draft response x 2 and strategy; .3
11/1/2024	Christopher B. Hall	750	2	\$1,500.00	Hyundai Mobis	Revise motion to stay including research of cases w court's staying FLSA SOL per agreement; .8 Review changes from co counsel and accept most changes; .3 Finalize motion and file; .5 Email opposing counsel re motion to stay and motion to extend time to file extension to respond to condit cert motion; .1 Draft motion to stay consent order; .3
11/5/2024	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	Emails re tolling limitations period; .3 Texts w dan re FLSA tolling; .1
11/6/2024	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	strategy email to dan; .1
11/7/2024	Christopher B. Hall	750	0.7	\$525.00	Hyundai Mobis	Emails to opposing counsel re motion to stay and tolling and accept all defendants changes and send to opposing counsel x 4; .4 Finalize motion to stay and file; .3
12/11/2024	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	review and revise communications re premediation document production and emails w counsel re strategy; .3 email opposing counsel re pre mediation doc production; .1
12/13/2024	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	emails re production; .1
1/14/2025	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	review Allswell produciton; 1.1 send link to co counsel; .1
1/15/2025	Christopher B. Hall	750	3.7	\$2,775.00	Hyundai Mobis	tc w co counsel re doc production; .4 review excel data for meet and confer and cross check woth other docs; 3.3
1/16/2025	Christopher B. Hall	750	1.9	\$1,425.00	Hyundai Mobis	draft meet and confer 1.8 emails re rescheduled mediation; .1
1/17/2025	Christopher B. Hall	750	0.8	\$600.00	Hyundai Mobis	review co couinsel changes to meet and confer and revise same;
1/20/2025	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	emails re mediation; .1
1/22/2025	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	emails re mediation; .1
1/24/2025	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	emails re mediation; .1
2/7/2025	Christopher B. Hall	750	0.3	\$225.00	Hyundai Mobis	review productions nd follow up with co counsel re status; .3

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2/20/2025	Christopher B. Hall	750	0.7	\$525.00	Hyundai Mobis	Prepare for call w opposing counsel and have call; .5 Review docs and email counsel showing that data produced insufficient re deductions; .2
2/21/2025	Christopher B. Hall	750	2.4	\$1,800.00	Hyundai Mobis	Review data explanation and data productions and send detailed response to Mobis counsel; 2.4
3/12/2025	Christopher B. Hall	750	0.8	\$600.00	Hyundai Mobis	Review docs produced; .5 Tc w co counsel; .3
3/24/2025	Christopher B. Hall	750	0.3	\$225.00	Hyundai Mobis	draft response to defendants relating to position that they don't have class member info; .3
4/1/2025	Christopher B. Hall	750	1.1	\$825.00	Hyundai Mobis	Review and analyze class list from Allswell and other class data; 1.1
4/9/2025	Christopher B. Hall	750	0.7	\$525.00	Hyundai Mobis	strategy tc w co counsel;
4/10/2025	Christopher B. Hall	750	2.1	\$1,575.00	Hyundai Mobis	review defendants' production
4/14/2025	Christopher B. Hall	750	1.5	\$1,125.00	Hyundai Mobis	review first draft of demand; .3 emails w co counsel re disgorg; review docs re wage differential and disgorgement; 1.2
4/15/2025	Christopher B. Hall	750	1.5	\$1,125.00	Hyundai Mobis	tc w dan re demand; .2 research re disgorgement and review compl re same and tc w dan re same and email co counsel; .8
4/16/2025	Christopher B. Hall	750	1	\$750.00	Hyundai Mobis	extensive revisions to mediation demand; 2.1 tc w dan; .1 review dan's revisions and revise more; .3 emails w co counsel' .3
4/17/2025	Christopher B. Hall	750	0.7	\$525.00	Hyundai Mobis	final revision re decertification issue and emails w co counsel; .3 tc w Brian; .1 emails w co counsel; .1
4/18/2025	Christopher B. Hall	750	1	\$750.00	Hyundai Mobis	emails and texts w co counsel re final demand and class size; .2 tc w opposing counsel re mediaton and class size x 2; .3 research re GA RICO punitives; .6 email to co counsel; .1
4/20/2025	Christopher B. Hall	750	0.3	\$225.00	Hyundai Mobis	Prepare for mediation review prior tn visa settlements; .3
4/21/2025	Christopher B. Hall	750	11	\$8,250.00	Hyundai Mobis	Attend mediation 8:30-7:30: 11 hours
4/22/2025	Christopher B. Hall	750	10.5	\$7,875.00	Hyundai Mobis	attend mediation 8:30-8:00 10.5 hours
4/23/2025	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	review term sheet and emails w co counsel re revisions; .4
4/24/2025	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	emails re term sheet; .2
4/25/2025	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	email w co counsel re settlement term sheet
4/28/2025	Christopher B. Hall	750	0.3	\$225.00	Hyundai Mobis	review proposed term sheet revisions from opposing counsele and
4/29/2025	Christopher B. Hall	750	0.8	\$600.00	Hyundai Mobis	emails between co counsel and opposing counsel and status report and term sheet 27 emails
5/1/2025	Christopher B. Hall	750	0.7	\$525.00	Hyundai Mobis	consider new term sheet langauge and emails re same and tc w werner
5/2/2025	Christopher B. Hall	750	0.3	\$225.00	Hyundai Mobis	emails re status report
5/6/2025	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	emails re settlement terms
5/7/2025	Christopher B. Hall	750	0.7	\$525.00	Hyundai Mobis	emails and analysis of settlement terms and comms with mediator
5/8/2025	Christopher B. Hall	750	0.5	\$375.00	Hyundai Mobis	emails and discussions w co counsel re settlement provisions
5/9/2025	Christopher B. Hall	750	7.1	\$5,325.00	Hyundai Mobis	draft settlement agreement
5/11/2025	Christopher B. Hall	750	6.6	\$4,950.00	Hyundai Mobis	Draft settlement agreement and long form notice; 6.6 email to co counsel
5/12/2025	Christopher B. Hall	750	5.5	\$4,125.00	Hyundai Mobis	detailed revisions to settlement agreement and emails w co counsel
5/13/2025	Christopher B. Hall	750	4.3	\$3,225.00	Hyundai Mobis	analyze huundai and KIA data for settlement allocations and settlement issues; 3.3 review FLSA settlement drafts
5/14/2025	Christopher B. Hall	750	3.3	\$2,475.00	Hyundai Mobis	revise settlement and long form notice

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5/15/2025	Christopher B. Hall	750	2.2	\$1,650.00	Hyundai Mobis	review data and email opposing counsel re same
5/21/2025	Christopher B. Hall	750	3.8	\$2,850.00	Hyundai Mobis	review and co counsel revisions and incorporate and finalize settlement draft and long form notice
5/22/2025	Christopher B. Hall	750	1.9	\$1,425.00	Hyundai Mobis	Revise motion for approval; .6 Revise settlement agreement; .4 Revise notice; .3 Revise distribution form; .2 Respond to co counsel emails; .4
5/29/2025	Christopher B. Hall	750	1	\$750.00	Hyundai Mobis	review settlement and notice and final corrections and send to opposing counsele;
6/2/2025	Christopher B. Hall	750	0.7	\$525.00	Hyundai Mobis	review allocation analysis and emails w co counsel re same;
6/9/2025	Christopher B. Hall	750	0.3	\$225.00	Hyundai Mobis	review motion for approval of JKL and email co counsel re same;
6/10/2025	Christopher B. Hall	750	1.1	\$825.00	Hyundai Mobis	review and revise JKL motion for FLSA approval
6/17/2025	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	tc w co counsel and email opposing counsel re settlement
6/25/2025	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	emails re settlement terms
7/1/2025	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	comm w co counsel re delay
7/4/2025	Christopher B. Hall	750	2.2	\$1,650.00	Hyundai Mobis	revise allocation analysis in detail and send excel analysis to co counsele;
7/5/2025	Christopher B. Hall	750	0.6	\$450.00	Hyundai Mobis	memo to co counsel re final revisions to settlement and notice and FLSA damages cutoff
7/6/2025	Christopher B. Hall	750	2.1	\$1,575.00	Hyundai Mobis	detailed review of werner issues and respond to each with detailed memo and revised motion for approval and long form notice
7/20/2025	Christopher B. Hall	750	0.9	\$675.00	Hyundai Mobis	emails to co counsel re detailed issues raised by defense counsel and look at issues re data, passport number issue, deadlines of opt out list and other deadlines and emails re all to co counsel
7/21/2025	Christopher B. Hall	750	0.7	\$525.00	Hyundai Mobis	review def long form revisions and accept most and revise; .3 emails w co counsel re settlement; .2 emails w opposing counsel re data issues; .2
7/22/2025	Christopher B. Hall	750	6.7	\$5,025.00	Hyundai Mobis	Revise Settlement Agreement and long form; prepare for counsel meeting; counsel meeting; tc w mike lucas; tc w dan werner; emails to co counsel re settlement issues; revise settlement and notice and send to co counsel; 6.7
7/23/2025	Christopher B. Hall	750	0.5	\$375.00	Hyundai Mobis	prepare for tc w opposing counsel re data; .2 tc w opposing counsel; .3
7/24/2025	Christopher B. Hall	750	7.9	\$5,925.00	Hyundai Mobis	Draft prelim appr order; 3.8 Revise settlement agreement and send to opposing counsel; 1.2 Revise long form and send to opposing counsel; .8 Revise motion for prelim approval and send to opposing counsel; 2.1
7/30/2025	Christopher B. Hall	750	2.5	\$1,875.00	Hyundai Mobis	Tc w co counsel; .2 Revise motin prelim approval relating to factors on approval substantially; work to cut below 25; 1.8 Revise prelim approval order re JKL settlement and finalize; .4 Send order and motion to opposing counsel; .1
8/6/2025	Christopher B. Hall	750	0.5	\$375.00	Hyundai Mobis	Email to evan and michael re data; .2 Email to opposing counsel re settlement docs; .1 Tc w co counsel re strategy; .2
8/7/2025	Christopher B. Hall	750	0.8	\$600.00	Hyundai Mobis	Review defense changes to settlement agreement and notice; .6 Detailed memo to co counsel re issues w revisions and issues to address; .2
8/13/2025	Christopher B. Hall	750	3	\$2,250.00	Hyundai Mobis	Revise settlement agreement; 2.1 Draft detailed email to opposing counsel re outstanding issues; .8 Email to co counsel; .1
8/14/2025	Christopher B. Hall	750	1	\$750.00	Hyundai Mobis	review and compare updated class data from Allswell; revise email to opposing counsel
8/15/2025	Christopher B. Hall	750	1.3	\$975.00	Hyundai Mobis	review werner's data anlysis and emails relating to same; email opposing counsel re data
8/18/2025	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	detailed email from opposing counsel, emails w opposing counsel and co counsel re class list data;
8/19/2025	Christopher B. Hall	750	0.7	\$525.00	Hyundai Mobis	email to opposing counsel re 1099 issues and Herra Loya claimant and tc w co counsel re negotiations re 1099 vs w2

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8/20/2025	Christopher B. Hall	750	0.5	\$375.00	Hyundai Mobis	tc w opposing counsel re class data issues; .3 detailed follow up email to defense counsel re outstanding issues; .2
8/22/2025	Christopher B. Hall	750	0.7	\$525.00	Hyundai Mobis	emails w co counsel re appeal and effective data issues and w2 vs 1099 and class member list and cafa and respond to co counsel re all of those issues; more emails w co counsel re same issues and strategy moving forward; .2
8/24/2025	Christopher B. Hall	750	4.4	\$3,300.00	Hyundai Mobis	review detailed defesne counsel drafts and revise all settlement docs and emails w co counsele re specific issues; 4.4
8/25/2025	Christopher B. Hall	750	1.7	\$1,275.00	Hyundai Mobis	finish revisions to SA and long form and detailed email to opposing counsel; 1.6 emails to co counsel re same;
8/27/2025	Christopher B. Hall	750	0.6	\$450.00	Hyundai Mobis	email opposing counsel revised settlement docs; .2 emails w opposing counsel re data issues; .2 emails w opposing counsel re settlement papers x 4;
8/28/2025	Christopher B. Hall	750	0.6	\$450.00	Hyundai Mobis	email opposing counsel re revisions and paragraph 10.1.8 and data issues; emails w co counsel x 13 re 60 day hearing issues;
9/2/2025	Christopher B. Hall	750	0.5	\$375.00	Hyundai Mobis	revise paragraphs and table of contents and email co counsel
9/3/2025	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	detailed memo to co counsel re hearing deadline and timing issues
9/4/2025	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	revise sa and long form again and send to opposing counsele
9/12/2025	Christopher B. Hall	750	3.3	\$2,475.00	Hyundai Mobis	email opposing counsel re update re data; review list of duplicates and compare data to verify (lenghty process)
9/17/2025	Christopher B. Hall	750	1.1	\$825.00	Hyundai Mobis	revise settlement agreement with revised allocations based on new data and revise notice re same and email to opposing counsel;
9/19/2025	Christopher B. Hall	750	1.7	\$1,275.00	Hyundai Mobis	revise settlement docs agains per additional defendant changes; 1.7
9/22/2025	Christopher B. Hall	750	3.4	\$2,550.00	Hyundai Mobis	Draft hall declaration; 1.2 Draft parker declaration and revise declaration per dan; .8 Revise motion for approval; 1.4
9/23/2025	Christopher B. Hall	750	4.8	\$3,600.00	Hyundai Mobis	Finalize motion final approval and draft declaration and reivse order; 4.8
9/24/2025	Christopher B. Hall	750	4.4	\$3,300.00	Hyundai Mobis	Final revisions to motion for approval and hall declaration and final review of all; 3.8 Emails to opposing counsel re settlement issues x 3; .4 Tc w co counsel; .2
10/1/2025	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	emails to opposing counsel for status update
10/3/2025	Christopher B. Hall	750	1.3	\$975.00	Hyundai Mobis	review email re changes from opposing counsel and revise agreements and send back.
10/8/2025	Christopher B. Hall	750	1.6	\$1,200.00	Hyundai Mobis	review data to identify extra class member;
10/9/2025	Christopher B. Hall	750	1.4	\$1,050.00	Hyundai Mobis	revise allocations per change in class size and memo to co counsel re same;
10/10/2025	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	email opposing counsel re revised allocations
10/15/2025	Christopher B. Hall	750	2.2	\$1,650.00	Hyundai Mobis	make multiple revisions per defendants and revise proposed order, notice, SA and redlines and send to opposing counsele
10/20/2025	Christopher B. Hall	750	1	\$750.00	Hyundai Mobis	rev motion for prelim approval and send redline to opposing counsel
10/23/2025	Christopher B. Hall	750	3.6	\$2,700.00	Hyundai Mobis	revise SA , proposed order, motion for approval and notice and send redlines to opposing counsel
11/3/2025	Christopher B. Hall	750	3.2	\$2,400.00	Hyundai Mobis	revise settlement papers per additional changes and detailed review; prepare all docs for singature with explanations on last revisions and send to all counsel;
11/6/2025	Christopher B. Hall	750	2.6	\$1,950.00	Hyundai Mobis	detailed revisoins to JKL FLSA motion for approval, declaration, and proposed order
11/7/2025	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	emails re client signatures

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11/10/2025	Christopher B. Hall	750	0.5	\$375.00	Hyundai Mobis	review and revise lee guarantee and email opposing counsel
11/20/2025	Christopher B. Hall	750	0.7	\$525.00	Hyundai Mobis	emails re media and other statements before final approval; emails coordinating filing and review and sign declaration
11/24/2025	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	emails re media and other statements before final approval
11/26/2025	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	emails re cafa
12/1/2025	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	emails re cafa x 6
12/5/2025	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	emails re hearing schedule
12/16/2025	Christopher B. Hall	750	1.1	\$825.00	Hyundai Mobis	prepare for zoom hearing and have zoom hearing
12/17/2025	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	review notes re hearing issues
1/4/2026	Christopher B. Hall	750	1.5	\$1,125.00	Hyundai Mobis	research re class member opt out issues and duties of parties and whether permissible for counsel to handle; and tc w dan werner re same; and emails re handling exclusions and opt outs x 14
1/5/2026	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	emails w co counsele re atticus as admin x 12 and opposing consel
1/7/2026	Christopher B. Hall	750	1.7	\$1,275.00	Hyundai Mobis	detailed review of all settlement documents and emails to co counsel re same;
1/8/2026	Christopher B. Hall	750	0.8	\$600.00	Hyundai Mobis	revise and coordinate revised settlement documents and send to opposing counsel;
1/20/2026	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	emails re court communication
1/23/2026	Christopher B. Hall	750	0.3	\$225.00	Hyundai Mobis	emails re court communication and email court
1/29/2026	Christopher B. Hall	750	1.2	\$900.00	Hyundai Mobis	review revised settlement docs from opposing counsel and emails w co counsel re revisions
2/1/2026	Christopher B. Hall	750	0.6	\$450.00	Hyundai Mobis	review revised docs from isabelle including redlines and email co counsel re same
2/3/2026	Christopher B. Hall	750	1.2	\$900.00	Hyundai Mobis	create new redline and send to opposing counsel
2/4/2026	Christopher B. Hall	750	1.5	\$1,125.00	Hyundai Mobis	final review of docs and emails w opposing counsel re final docs; emails w opposing counsel re redlines
2/5/2026	Christopher B. Hall	750	2.2	\$1,650.00	Hyundai Mobis	draft detailed email to opposing counsel re revisions in settlement agreement; review lengthy email from opposing counsel and respond
2/6/2026	Christopher B. Hall	750	1.2	\$900.00	Hyundai Mobis	revise docs again and email opposing counsele re various issues x 3 and emails w opposing counsele and co counsel x 12
2/8/2026	Christopher B. Hall	750	1.3	\$975.00	Hyundai Mobis	final review and edits and emails to opposing counsel identifying corections
2/9/2026	Christopher B. Hall	750	5	\$3,750.00	Hyundai Mobis	5 hours formatting and filing and proofing and revising amended motion for preliminary approval.
2/15/2026	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	email to court
2/18/2026	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	Review preliminary approval order and calculate deadlines and memo to file re same; .4
2/20/2026	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	email co counsel re longform and atticus and opposing counsel
2/23/2026	Christopher B. Hall	750	0.4	\$300.00	Hyundai Mobis	review and approve draft email to opposing counsel Phaff re class members and contact info x 16 and emails w court
2/25/2026	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	emails w co counsel and defense counsel
2/27/2026	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	review and approve draft email to opposing counsel Gibbs re class members and contact info
3/10/2026	Christopher B. Hall	750	1.3	\$975.00	Hyundai Mobis	revise memo in support of motion for approval; 1.3
3/11/2026	Christopher B. Hall	750	0.8	\$600.00	Hyundai Mobis	research days worked for JKL claimants and email co counsel re same; .8
3/30/2026	Christopher B. Hall	750	1.8	\$1,350.00	Hyundai Mobis	revise memo support JKL approval; emails re declaration; .1

Date	User	Rate/Cost	Time	Total	Case Link	Description
4/16/2026	Christopher B. Hall	750	0.1	\$75.00	Hyundai Mobis	emails w co counsel re declaration
4/23/2026	Christopher B. Hall	750	0.2	\$150.00	Hyundai Mobis	emails w administrator about class admin notice declaration
4/28/2026	Christopher B. Hall	750	2.2	\$1,650.00	Hyundai Mobis	draft motion for final approval
4/29/2026	Christopher B. Hall	750	3.8	\$2,850.00	Hyundai Mobis	draft motion for final approval
Total	Christopher B. Hall	750	344.5	\$258,375.00		
<b>Rachel B. Benjamin</b>						
8/4/2022	Rachel B Benjamin	\$575.00	1	\$575.00	Hyundai Mobis	Consult with Jose Oswaldo re potential class action against Allswell
8/8/2022	Rachel B Benjamin	\$575.00	5.4	\$3,105.00	Hyundai Mobis	call with Mr. Martinez and translator. (1) calls with Ben Botts re possible co-counsel (.4) meetings with chris hall and brian sutherland re possible claims to pursue (1) legal research on claims and begin drafting lawsuit (3)
8/9/2022	Rachel B Benjamin	\$575.00	1.4	\$805.00	Hyundai Mobis	continue drafting lawsuit (1) communications with client and schedule in person meeting (.4)
8/11/2022	Rachel B Benjamin	\$575.00	1.9	\$1,092.50	Hyundai Mobis	Calls with client (.5) Review and incorporate Chris Hall and Gordon Van Remmen's changes to Complaint. (5) Finalize complaint and prepare summons' and civil cover sheet (.5) Finalize and file EEOC charges (.4)
8/11/2022	Rachel B Benjamin	\$575.00	0.7	\$402.50	Hyundai Mobis	Zoom meeting with Ben Botts and Claudia re: other victims of discrimination and visa fraud at Allswell/Hyundai
8/12/2022	Rachel B Benjamin	\$575.00	6	\$3,450.00	Hyundai Mobis	Travel to/from Alabama to meet clients (.3) In-person meeting with Plaintiff and other victims (3)
8/15/2022	Rachel B Benjamin	\$575.00	0.7	\$402.50	Hyundai Mobis	Text messages with client (.3); t/c with immigration lawyer Ms. Cutler and BJS re how status can be impacted (.5)
8/16/2022	Rachel B Benjamin	\$575.00	0.4	\$230.00	Hyundai Mobis	Conference with BJS re legal issues and legal research.
8/22/2022	Rachel B Benjamin	\$575.00	0.3	\$172.50	Hyundai Mobis	email with CBH re legal issues.
8/23/2022	Rachel B Benjamin	\$575.00	0.3	\$172.50	Hyundai Mobis	Conference with Evan Gibbs re his representation of Allswell.
8/23/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	Conference with CBH re legal issues in case.
8/23/2022	Rachel B Benjamin	\$575.00	0.4	\$230.00	Hyundai Mobis	Conference with Jorge re: possibly resigning from position and what to expect in litigation.
8/23/2022	Rachel B Benjamin	\$575.00	0.3	\$172.50	Hyundai Mobis	telephone call with representative from mexican consulate in atlanta
8/24/2022	Rachel B Benjamin	\$575.00	0.7	\$402.50	Hyundai Mobis	telephone call with Ben Botts re potential named plaintiff.
8/24/2022	Rachel B Benjamin	\$575.00	0.3	\$172.50	Hyundai Mobis	email with ben botts re legal research on joint employer issues.
8/24/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	email with EEOC re request for right to sue and contact information for respondents' attorneys.
8/25/2022	Rachel B Benjamin	\$575.00	0.9	\$517.50	Hyundai Mobis	telephone call with Elvis Vasquez re his employment with defendants.
8/25/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	email exchange with evan gibbs.
8/26/2022	Rachel B Benjamin	\$575.00	0.3	\$172.50	Hyundai Mobis	T/c with Evan Gibbs re extension for add'l time to answer and possible MTD.
8/26/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	Conference with BJS re call with Evan Gibbs.
8/26/2022	Rachel B Benjamin	\$575.00	0.3	\$172.50	Hyundai Mobis	Review Elvis Vasquez's documents and text messages with him re same.
8/29/2022	Rachel B Benjamin	\$575.00	0.3	\$172.50	Hyundai Mobis	Email with Ben Botts schedule calling; email with Elvis Vasquez scheduling call and review add'l documents he sent.
8/30/2022	Rachel B Benjamin	\$575.00	0.5	\$287.50	Hyundai Mobis	Telephone call with Elvis re case and representation.
8/30/2022	Rachel B Benjamin	\$575.00	0.4	\$230.00	Hyundai Mobis	Meeting with CBH and BJS re claims and adding Mr. Elvis Vasquez as named plaintiff.

Date	User	Rate/Cost	Time	Total	Case Link	Description
8/30/2022	Rachel B Benjamin	\$575.00	0.4	\$230.00	Hyundai Mobis	Translate class fee agreement into Spanish for Elvis Vasquez and Jorge Martinez.
8/31/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	Communication with opposing counsel Evan Gibbs re: additional time to answer Complaint.
8/31/2022	Rachel B Benjamin	\$575.00	0.3	\$172.50	Hyundai Mobis	Conference with Evan Gibbs and BJS re: extensions of deadlines in case.
8/31/2022	Rachel B Benjamin	\$575.00	0.5	\$287.50	Hyundai Mobis	Conference with BJS and CBH re: amendment of complaint to include RICO claims; association of other counsel, and other matters.
8/31/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	Telephone call with Ben Botts re associating on case.
8/31/2022	Rachel B Benjamin	\$575.00	0.1	\$57.50	Hyundai Mobis	Review BJS revisions to motion to extend deadlines and email to Evan Gibbs and defense counsel.
8/31/2022	Rachel B Benjamin	\$575.00	0.7	\$402.50	Hyundai Mobis	Revise complaint to amend and add new plaintiff Elvis Vasquez and joint employer allegations.
9/1/2022	Rachel B Benjamin	\$575.00	1	\$575.00	Hyundai Mobis	Legal research re RICO cases/claims
9/1/2022	Rachel B Benjamin	\$575.00	0.3	\$172.50	Hyundai Mobis	T/c with Ben Botts re: possibility of co-counseling.
9/2/2022	Rachel B Benjamin	\$575.00	1	\$575.00	Hyundai Mobis	Zoom call with Radford, Werner and Chris/Brian re joining forces
9/6/2022	Rachel B Benjamin	\$575.00	0.1	\$57.50	Hyundai Mobis	Review Elvis' resume.
9/7/2022	Rachel B Benjamin	\$575.00	0.5	\$287.50	Hyundai Mobis	Call with co-counsel
9/8/2022	Rachel B Benjamin	\$575.00	0.3	\$172.50	Hyundai Mobis	Review communication Allswell sent to workers via Whatsapp with Troutman Pepper memo in visa information.
9/11/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	Communication with Daniel Werner re handling intake calls with potential new clients.
9/12/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	Review email from Evan Gibbs. Review court order approving joint motion for extension of time to answer.
9/14/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	Save rights to sue received and notify opposing counsel re same.
9/15/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	T/c with Evan Gibbs re deadlines in case.
9/16/2022	Rachel B Benjamin	\$575.00	1	\$575.00	Hyundai Mobis	Zoom meeting with co-counsel and team
9/19/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	Communications with opposing counsel scheduling call re deadlines in case
9/22/2022	Rachel B Benjamin	\$575.00	0.3	\$172.50	Hyundai Mobis	Video conference with opposing counsel re local rule and class communications. Prepare joint statement reflecting agreement.
9/22/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	Revision to joint motion to extend time to answer and circulate to opposing counsel
10/4/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	share client documents with co-counsel
10/4/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	T/c with Reuters reporter
10/15/2022	Rachel B Benjamin	\$575.00	1	\$575.00	Hyundai Mobis	Review motions to dismiss filed by Defendants; circulate to team and propose meeting to discuss division of work. Calendar deadline to amend complaint.
10/17/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	Email and text Elvis re scheduling call
10/17/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	Email opposing counsel re extension of time to respond to MTD
10/18/2022	Rachel B Benjamin	\$575.00	0.3	\$172.50	Hyundai Mobis	Draft consent motion for extension of time to respond to defendants' motion to dismiss
10/18/2022	Rachel B Benjamin	\$575.00	1	\$575.00	Hyundai Mobis	Telephone call with named plaintiff Elvis and translator Luz re facts supporting his claims
10/18/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	finalize draft for motion to extend deadline to respond to MTD and send to defense counsel
10/19/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	file motion for ext of time to respond to motions to dismiss on ecf.
10/19/2022	Rachel B Benjamin	\$575.00	0.4	\$230.00	Hyundai Mobis	Team meeting with co-counsel re work to be done.

Date	User	Rate/Cost	Time	Total	Case Link	Description
10/19/2022	Rachel B Benjamin	\$575.00	1.2	\$690.00	Hyundai Mobis	Create chart to compare and analyze potential plaintiffs to include in amended complaint. Fill in with relevant information in case file.
10/20/2022	Rachel B Benjamin	\$575.00	0.3	\$172.50	Hyundai Mobis	Revise excel chart detailing analysis of potential plaintiffs.
10/21/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	put Plaintiff Analysis spreadsheet on Google sheets and recirculate.
10/23/2022	Rachel B Benjamin	\$575.00	0.3	\$172.50	Hyundai Mobis	Review additional documents submitted by Elvis
10/24/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	Email with Evan Gibbs re extending R26 deadline.
10/27/2022	Rachel B Benjamin	\$575.00	2.2	\$1,265.00	Hyundai Mobis	Work on amending complaint to add named Plaintiff Elvis Vasquez's facts.
10/28/2022	Rachel B Benjamin	\$575.00	0.7	\$402.50	Hyundai Mobis	Telephone call with Elvis and translator Luz.
10/28/2022	Rachel B Benjamin	\$575.00	3	\$1,725.00	Hyundai Mobis	Revise amended complaint; confer with CBH re same and review his suggested revisions; continue revising. Research TN Visa requirements and translate client documents for purposes of including in amended complaint.
10/30/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	confer with CBH Re amending complaint to add other plaintiffs.
10/30/2022	Rachel B Benjamin	\$575.00	1.4	\$805.00	Hyundai Mobis	Review Heber Contreras' documents and begin to draft his fact section for Amended Complaint.
10/31/2022	Rachel B Benjamin	\$575.00	5	\$2,875.00	Hyundai Mobis	Review new plaintiff documents and amend complaint to add all new plaintiffs' facts.
10/31/2022	Rachel B Benjamin	\$575.00	1	\$575.00	Hyundai Mobis	Further refine and revise each plaintiff's fact section, highlighting missing information throughout.
11/1/2022	Rachel B Benjamin	\$575.00	3.5	\$2,012.50	Hyundai Mobis	Work on amended complaint Listen to recordings
11/2/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	email with dan werner re heber zapatar's facts for complaint
11/2/2022	Rachel B Benjamin	\$575.00	2	\$1,150.00	Hyundai Mobis	listen to recordings for complaint with paul lee; work on revising complaint.
11/3/2022	Rachel B Benjamin	\$575.00	5	\$2,875.00	Hyundai Mobis	Work on draft amended complaint. Research and include Georgia RICO count. Begin to pull and organize exhibits for complaint.
11/4/2022	Rachel B Benjamin	\$575.00	6	\$3,450.00	Hyundai Mobis	Finalize draft amended complaint. Put together all exhibits. Finalize table of contents. Finalize complaint and file on ECF.
11/14/2022	Rachel B Benjamin	\$575.00	0.3	\$172.50	Hyundai Mobis	Call with Evan Gibbs re extensions of deadlines and possibility of resolution
11/14/2022	Rachel B Benjamin	\$575.00	0.4	\$230.00	Hyundai Mobis	Meeting with Chris and Brian re settlement strategy.
11/16/2022	Rachel B Benjamin	\$575.00	0.7	\$402.50	Hyundai Mobis	Team call re case and outstanding tasks to be performed
11/16/2022	Rachel B Benjamin	\$575.00	0.6	\$345.00	Hyundai Mobis	T/c with Evan Gibbs re settlement possibility and extension of deadlines. (.3) Update Brian, Chris and then email team with updates on same (.3)
11/16/2022	Rachel B Benjamin	\$575.00	0.3	\$172.50	Hyundai Mobis	Revise draft joint motion to extend deadlines and page limits.
11/17/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	T/c with Mobis lawyer re pleading to be filed
11/22/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	email with evan gibbs re additional defendants.
11/30/2022	Rachel B Benjamin	\$575.00	0.8	\$460.00	Hyundai Mobis	Team meeting
11/30/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	Draft talking points for conversation with Evan
12/1/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	review CBH's revisions to talking points for call with Evan. Discuss w/him and finalize/circulate to team.
12/6/2022	Rachel B Benjamin	\$575.00	0.5	\$287.50	Hyundai Mobis	Team meeting re: case
12/8/2022	Rachel B Benjamin	\$575.00	0.5	\$287.50	Hyundai Mobis	T/c with Evan Gibbs re possible settlement and summarize call to co-counsel
12/13/2022	Rachel B Benjamin	\$575.00	0.4	\$230.00	Hyundai Mobis	Speak with Jorge Martinez re facts and working for Kia.

Date	User	Rate/Cost	Time	Total	Case Link	Description
12/13/2022	Rachel B Benjamin	\$575.00	4	\$2,300.00	Hyundai Mobis	Review revised second amended complaint prepared by Kristen at CDM And begin to further revise and add Rico enterprises. Research relationship between Kia and Hyundai.
12/14/2022	Rachel B Benjamin	\$575.00	0.8	\$460.00	Hyundai Mobis	Conference with team re: claims and enterprise allegations and other allegations.
12/14/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	email with john jarvis re: request for rts in some of plaintiff's title vii claims.
12/14/2022	Rachel B Benjamin	\$575.00	3	\$1,725.00	Hyundai Mobis	work on second amended complaint
12/15/2022	Rachel B Benjamin	\$575.00	3	\$1,725.00	Hyundai Mobis	Continue revising and working on second amended complaint.
12/16/2022	Rachel B Benjamin	\$575.00	2	\$1,150.00	Hyundai Mobis	Team meeting re revisions to SAC.
12/16/2022	Rachel B Benjamin	\$575.00	5	\$2,875.00	Hyundai Mobis	Revise, draft, and finalize second amended complaint and exhibits. File on ECF.
12/19/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	email with Kia counsel re waiver of service
12/20/2022	Rachel B Benjamin	\$575.00	0.4	\$230.00	Hyundai Mobis	prepare proposed summons for all 4 new defendants, file on ECF.
12/20/2022	Rachel B Benjamin	\$575.00	0.2	\$115.00	Hyundai Mobis	Communcation with Evan Gibbs re meeting with his client and scheduling call
<b>Total Rachel Berlin Benjamin x</b>			<b>91.8</b>	<b>\$52,785.00</b>		
<b>Brian Sutherland</b>						
8/13/2022	Brian J. Sutherland	\$600.00	6	\$3,600.00	Hyundai Mobis	Traveled to West Point and met with client and witnesses with RBB, CBH, and Leo.
8/15/2022	Brian J. Sutherland	\$600.00	0.5	\$300.00	Hyundai Mobis	Conference with RBB re: VISA issues.
8/15/2022	Brian J. Sutherland	\$600.00	2.5	\$1,500.00	Hyundai Mobis	Researched Title VII and 1981 theories for staffing agency cases.
8/16/2022	Brian J. Sutherland	\$600.00	0.4	\$240.00	Hyundai Mobis	Conference with RBB re: research for Hyundai class action and amendment of complaint.
8/16/2022	Brian J. Sutherland	\$600.00	1	\$600.00	Hyundai Mobis	Researched case law on joint employer and staffing agencies and drafted notes to RBB from Westlaw re: same.
8/26/2022	Brian J. Sutherland	\$600.00	0.4	\$240.00	Hyundai Mobis	Conference with RBB re: conversation with Gibbs.
8/31/2022	Brian J. Sutherland	\$600.00	0.2	\$120.00	Hyundai Mobis	Conference with RBB re: email from Evan Gibbs re: extension of time to answer and class discovery; reviewed email from Evan Gibbs.
8/31/2022	Brian J. Sutherland	\$600.00	0.3	\$180.00	Hyundai Mobis	Conference Evan Gibbs and RBB re: amendments.
8/31/2022	Brian J. Sutherland	\$600.00	0.5	\$300.00	Hyundai Mobis	Conference with RBB and CBH re: amendment of complaint to include RICO claims; association of other counsel, and other matters.
8/31/2022	Brian J. Sutherland	\$600.00	0.5	\$300.00	Hyundai Mobis	Reviewed draft motion to extend time for answer and class certification motion; drafted email to RBB re: same.
9/1/2022	Brian J. Sutherland	\$600.00	0.3	\$180.00	Hyundai Mobis	Conference with RBB and CBH re: merits and RICO claims.
9/2/2022	Brian J. Sutherland	\$600.00	1	\$600.00	Hyundai Mobis	Conference call with CBH, RBB, Dan Werner, and James Radford re: Mobis case and TN visa issues.
9/8/2022	Brian J. Sutherland	\$600.00	0.5	\$300.00	Hyundai Mobis	Conference with Dan Werner, James Radford, Ben Botts, CBH, and RBB re: class action association.
9/9/2022	Brian J. Sutherland	\$600.00	0.3	\$180.00	Hyundai Mobis	Review of email from CBH to K&R; re: co-counsel arrangements; conference with RBB and CBH re: same.
9/9/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from RBB re: proposal to R&K; re: fee split and co-counsel arrangement.
9/9/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from CBH re: proposal to R&K; re: fee split and co-counsel arrangement.
9/9/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of email from Ben Botts re: Troutman Pepper meeting with claimants re: immigration status.
9/9/2022	Brian J. Sutherland	\$600.00	0.2	\$120.00	Hyundai Mobis	Review of email from RBB with translation of Troutman Pepper statement to claimants re: immigration status.

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9/9/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of email from Evan Gibbs re: court's order on motion for extension of time.
9/9/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from Daniel Werner re: joint prosecution agreement ideas.
9/9/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from Dan Werner re: intakes to be conducted by CDM.
9/10/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of email from CBH to Dan Werner re: fee agreements.
9/12/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of email from RBB re: changes to joint prosecution agreement.
9/12/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of email from Ben Boots re: additional intakes.
9/12/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of email from RBB re: splitting up intakes with Ben Botts at CDM re: intakes.
9/12/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of email from RBB to Evan Gibbs re: filings re: motion for extensions.
9/13/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from CBH re: message to co-counsel re: fee agreement; drafted response to same.
9/13/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from CBH to Dan Werner and James Radford re: joint prosecution agreement.
9/13/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of email from CBH re: reimbursements of expenses provision of joint prosecution agreement and rates.
9/13/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of pro hac vice application filings by opposing counsel Jon Gumbel and Michael Lucas.
9/14/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from Dan Werner re: conference call.
9/14/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from CBH to James Radford re: new clients signed up.
9/14/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from James Radford re: attorney's fees in individual cases.
9/15/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from Dan Werner re: Zoom meeting.
9/15/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from James Radford re: Zoom meeting.
9/15/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from RBB to opposing counsel re: receipt of notices of right to sue.
9/15/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed from email from Ben Botts re: contingency fee percentages in class counsel arrangements.
9/16/2022	Brian J. Sutherland	\$600.00	1	\$600.00	Hyundai Mobis	Conference with co-counsel team re: setting up team platforms for worksharing.
9/19/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of email between opposing counsel Evan Gibbs re: Rule 23 conference and email with RBB and opposing counsel re: setting up the conference.
10/14/2022	Brian J. Sutherland	\$600.00	0.5	\$300.00	Hyundai Mobis	Review of motion to dismiss filed by opposing counsel.
10/17/2022	Brian J. Sutherland	\$600.00	0.3	\$180.00	Hyundai Mobis	Meeting with CBH and RBB re: response to motion to dismiss; related cases.
10/18/2022	Brian J. Sutherland	\$600.00	0.2	\$120.00	Hyundai Mobis	Reviewed email from RBB re: draft consent motion to extend; drafted proposed revisions and email to RBB and CBH re: same.
10/18/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from Evan Gibbs re: consent to extension of time for answer.
10/19/2022	Brian J. Sutherland	\$600.00	0.3	\$180.00	Hyundai Mobis	Conference with Dan Werner re: preparing complaint and briefs; conference with RBB and CBH re: pushing back meeting at their office.
10/19/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of order granting consent motion to extend time to respond to motion to dismiss.
10/19/2022	Brian J. Sutherland	\$600.00	0.8	\$480.00	Hyundai Mobis	Conference with RBB, CBH, Dan Werner, and James Radford re: amendment of complaint to include additional plaintiffs and deadlines.
10/19/2022	Brian J. Sutherland	\$600.00	2	\$1,200.00	Hyundai Mobis	Researched Georgia law on contract damages; drafted email to CBH and RBB re: same.
10/20/2022	Brian J. Sutherland	\$600.00	0.2	\$120.00	Hyundai Mobis	Review of email from CBH and RBB re: review of claimant spreadsheet for amended complaint.
10/21/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of email from team re: claimant spreadsheet.

Date	User	Rate/Cost	Time	Total	Case Link	Description
10/31/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of email from CBH and RBB re: claimants and amended complaint.
11/2/2022	Brian J. Sutherland	\$600.00	0.4	\$240.00	Hyundai Mobis	Reviewed email from RBB re: summary of recording of Allswell owner; drafted email re: significance of facts.
11/3/2022	Brian J. Sutherland	\$600.00	0.5	\$300.00	Hyundai Mobis	Conference with RBB re: Georgia RICO claims; review of email from co-counsel re: amendments to complaint.
11/4/2022	Brian J. Sutherland	\$600.00	1.5	\$900.00	Hyundai Mobis	Reviewed and drafted edits for Amended Complaint; conference with RBB re: same.
11/9/2022	Brian J. Sutherland	\$600.00	0.5	\$300.00	Hyundai Mobis	Conference with team re: amendment to include Kia; EEOC charge for Veronica.
11/9/2022	Brian J. Sutherland	\$600.00	0.4	\$240.00	Hyundai Mobis	Drafted amended EEOC charge and email to co-counsel re: same.
11/16/2022	Brian J. Sutherland	\$600.00	0.8	\$480.00	Hyundai Mobis	Conference with team re: settlement prospects and amendment of the complaint.
11/16/2022	Brian J. Sutherland	\$600.00	0.2	\$120.00	Hyundai Mobis	Conference with RBB re: settlement discussion with opposing counsel.
11/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from Ben Botts re: Hyundai child labor investigation.
11/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from Dan Werner re: Hyundai child labor.
11/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from Evan Gibbs re: draft motion on extensions of time.
11/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from RBB re: communication with Evan Gibbs re: settlement discussions.
11/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from Dan Werner and Ben Botts re: settlement discussions.
11/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from RBB to Evan Gibbs with revisions of joint motion for extension.
11/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed electronic filing notice re: joint motion to extend deadlines.
11/16/2022	Brian J. Sutherland	\$600.00	0.2	\$120.00	Hyundai Mobis	Review of revision of draft complaint from Ben Botts and questions and comments.
11/21/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed electronic case filing notice re: submission of consent motion to extend initial discovery deadlines.
11/22/2022	Brian J. Sutherland	\$600.00	0.3	\$180.00	Hyundai Mobis	Review of email from Ben Botts re: additional complainants and defendants and attachments.
11/23/2022	Brian J. Sutherland	\$600.00	0.2	\$120.00	Hyundai Mobis	Reviewed email chain from Dan Werner re: whether to include Salazar as a class representative; drafted response.
11/30/2022	Brian J. Sutherland	\$600.00	0.8	\$480.00	Hyundai Mobis	Conference with team re: amendments and settlement negotiations.
12/1/2022	Brian J. Sutherland	\$600.00	0.2	\$120.00	Hyundai Mobis	Reviewed draft talking points for RBB call with Evan Gibbs; conference with RBB re: same.
12/2/2022	Brian J. Sutherland	\$600.00	0.2	\$120.00	Hyundai Mobis	Review of email from Ben Botts re: initial demand, prospective relief, and cy pres for settlement fund.
12/5/2022	Brian J. Sutherland	\$600.00	0.4	\$240.00	Hyundai Mobis	Review of email from Ben Botts re: public funding and Open Records Act requests for false claims theories of relief; drafted response email to team re: same.
12/5/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email re: scheduling a team meeting before holiday.
12/6/2022	Brian J. Sutherland	\$600.00	0.5	\$300.00	Hyundai Mobis	Conference with team re: status of filings and settlement negotiation.
12/7/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of electronic case filing notice re: submission of consent motion; email from Ben Botts re: same.
12/9/2022	Brian J. Sutherland	\$600.00	0.5	\$300.00	Hyundai Mobis	Conference with Dan and RBB re: settlement negotiations.
12/13/2022	Brian J. Sutherland	\$600.00	0.3	\$180.00	Hyundai Mobis	Conference with RBB re: enterprise and allegations.
12/13/2022	Brian J. Sutherland	\$600.00	0.2	\$120.00	Hyundai Mobis	Review of email from RBB re: details of settlement discussion conversation with Evan Gibbs and email from team re: same.
12/14/2022	Brian J. Sutherland	\$600.00	0.8	\$480.00	Hyundai Mobis	Conference with team re: claims and enterprise allegations and other allegations.
12/14/2022	Brian J. Sutherland	\$600.00	0.2	\$120.00	Hyundai Mobis	Review of email from RBB re: allegations about Hyundai Mobis and Kia; responded to same.

Date	User	Rate/Cost	Time	Total	Case Link	Description
12/14/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from RBB with revised allegations for Hyundai/Kia relationship; responded to same.
12/14/2022	Brian J. Sutherland	\$600.00	0.5	\$300.00	Hyundai Mobis	Conference with RBB re: new facts on website and implications for joint employer and enterprise analyses; review of emails from RBB to team re: same.
12/15/2022	Brian J. Sutherland	\$600.00	0.4	\$240.00	Hyundai Mobis	Conference with Dan Werner re: enterprise allegations based on Allswell website and U-visas as possible prospective injunctive relief for settlement.
12/15/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of email from RBB re: representations on Allswell website.
12/15/2022	Brian J. Sutherland	\$600.00	5.5	\$3,300.00	Hyundai Mobis	Reviewed and drafted revisions to Second Amended Complaint.
12/16/2022	Brian J. Sutherland	\$600.00	0.4	\$240.00	Hyundai Mobis	Conference with RBB re: timeline and continuity allegations; messages to client Jorge Martinez re: number of TN visa workers, etc.
12/16/2022	Brian J. Sutherland	\$600.00	0.2	\$120.00	Hyundai Mobis	Review of new RICO conspiracy counts for SAC from Dan Werner.
12/16/2022	Brian J. Sutherland	\$600.00	0.2	\$120.00	Hyundai Mobis	Reviewed and responded to email from Ben Botts re: timeline and Rule 11 applicability to certain allegations.
12/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from RBB re: chart edits.
12/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of email from RBB re: inferences about timeline for JKL; conference with RBB re: same.
12/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of email from Dan Werner re: Georgia RICO allegation change and email from RBB re: same.
12/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from Dan Werner re: summonses.
12/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from RBB re: summonses.
12/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from RBB re: table of contents.
12/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from RBB re: exhibits to complaint.
12/16/2022	Brian J. Sutherland	\$600.00	0.2	\$120.00	Hyundai Mobis	Reviewed email from Dan Werner with chart attachment.
12/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Drafted email re: language for comparators and class members.
12/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed and responded to email from Ben Botts re: language for class members and comparators.
12/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from RBB re: language for class members and comparators.
12/16/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from Dan Werner re: language for class members and comparators.
12/16/2022	Brian J. Sutherland	\$600.00	0.5	\$300.00	Hyundai Mobis	Reviewed emails from team members re: changes to complaint; exchanged email with team members re: same; exchanged text messages with RBB re: changes to complaint and JKL allegations.
12/21/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of CM/ECF notice of filing of admission of Allison Hawkins pro hac vice for Mobis Alabama.
12/21/2022	Brian J. Sutherland	\$600.00	0.3	\$180.00	Hyundai Mobis	Reviewed and responded to email from Dan Werner re: rescheduling call; review of email from Ben Botts re: immigration relief for class members.
12/22/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Review of filings re: issuance of electronic summonses for defendants.
12/27/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from Janine re: service of process package.
12/27/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from RBB re: service of actual summons and response from Janine re: downloading and service.
12/27/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from Janine re: sending again of signed summonses.
12/27/2022	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Exchanged messages with RBB re: request for waiver of service of summons to Paul Lee and Kia.

Date	User	Rate/Cost	Time	Total	Case Link	Description
12/28/2022	Brian J. Sutherland	\$600.00	1	\$600.00	Hyundai Mobis	Saved electronic summonses from docket to file; prepared notice of lawsuit and request for waivers of service of summons; saved reduced file-size copy of complaint with exhibits; prepared waiver forms for defendants; drafted emails to counsel for Youngjin Lee and Kia re: same.
1/4/2023	Brian J. Sutherland	\$600.00	0.1	\$60.00	Hyundai Mobis	Reviewed email from RBB to Janine re: calendaring of notices.
1/11/2023	Brian J. Sutherland	\$600.00	0.5	\$300.00	Hyundai Mobis	Conference with team re: status of litigation.
<b>TOTAL BRIAN SUTHERLAND Brian J. Sutherland</b>			<b>44.4</b>	<b>\$26,640.00</b>		
<b>Ricardo Gilb</b>						
2/9/2024	Ricardo Gilb	\$300.00	3	\$1,050.00	Hyundai Mobis	redling of objections ro rr
3/12/2024	Ricardo Gilb	\$300.00	1.2	\$420.00	Hyundai Mobis	edit response to objections to RR (Mobis)
3/13/2024	Ricardo Gilb	\$300.00	1.3	\$455.00	Hyundai Mobis	edit responste to objections to RR (kia)
3/14/2024	Ricardo Gilb	\$300.00	4.5	\$1,575.00	Hyundai Mobis	edit full Mobis Response
3/15/2024	Ricardo Gilb	\$300.00	2.2	\$770.00	Hyundai Mobis	edit full Kia Resp; final edits to Mobis Resp
8/19/2024	Ricardo Gilb	\$300.00	4.5	\$1,575.00	Hyundai Mobis	draft mtn for cond cert
8/22/2024	Ricardo Gilb	\$300.00	2.5	\$875.00	Hyundai Mobis	draft mtn for cond cert
8/23/2024	Ricardo Gilb	\$300.00	4	\$1,400.00	Hyundai Mobis	emai/discuss cond cert w cbh and revise draft
8/26/2024	Ricardo Gilb	\$300.00	0.5	\$175.00	Hyundai Mobis	discuss w cbh and call re cond cert motion; work on declarations for cond cert
8/27/2024	Ricardo Gilb	\$300.00	1	\$350.00	Hyundai Mobis	zoom meeting re cond cert motion; research on voluntary dismissal and claim preclusion
9/4/2024	Ricardo Gilb	\$300.00	0.2	\$70.00	Hyundai Mobis	coom meeting re cond cert motion
9/11/2024	Ricardo Gilb	\$300.00	0.9	\$315.00	Hyundai Mobis	edits on motion for cond cert and zoom meeting re mobis status
10/17/2024	Ricardo Gilb	\$300.00	0.8	\$280.00	Hyundai Mobis	edits to motion for cond cert
10/22/2024	Ricardo Gilb	\$300.00	0.6	\$210.00	Hyundai Mobis	finalize mot for cond cert
11/1/2024	Ricardo Gilb	\$300.00	1	\$350.00	Hyundai Mobis	edits to joint motion to stay
		\$300.00	28.2	\$8,460.00		
<b>Gordon Van Remmen</b>						
8/11/2022	Gordon Van Remmen	\$450.00	2.8	\$1,260.00	Hyundai Mobis	revise complaint
11/4/2022	Gordon Van Remmen	\$450.00	1.8	\$810.00	Hyundai Mobis	revise amended complaint
3/10/2023	Gordon Van Remmen	\$450.00	1.7	\$765.00	Hyundai Mobis	final revisions to MTD filing
2/27/2023	Gordon Van Remmen	\$450.00	4.4	\$1,980.00	Hyundai Mobis	revise RICO insert to resp to MTD
			10.7	\$4,815.00		
<b>Name</b>	<b>Rate</b>	<b>Hours</b>	<b>Total</b>			
Chris Hall	750	344.5	258,375.00			
Gordon Van Remmen	450	10.7	4,815.00			

Date	User	Rate/Cost	Time	Total	Case Link	Description
Ricardo Gilb	300	28.2	8,460.00			
Rachel Berlin Benjamin	575	91.8	52,785.00			
Brian Sutherland	600	44.4	26,640.00			
<b>TOTAL</b>			<b>351,075.00</b>			