

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
NEWNAN DIVISION

JORGE OSWALDO AQUINO	)	
MARTINEZ, <i>et al.</i>	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 3:22-cv-00145-TCB-RGV
	)	
MOBIS ALABAMA, LLC d/b/a	)	
HYUNDAI MOBIS, <i>et al.</i>	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF DANIEL WERNER IN SUPPORT OF PLAINTIFFS'  
APPLICATION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

COMES NOW DANIEL WERNER, who declares under penalty of perjury and states as follows:

1. My name is Daniel Werner. I am co-counsel for Plaintiffs in the above-captioned class action lawsuit.
2. I submit this Declaration in support of Plaintiffs' Application for an Award of Attorneys' Fees and Expenses.

*Professional Background*

3. I received my J.D. from State University of New York at Buffalo School of Law in 1996 and have devoted my career to representing immigrant workers in civil and employment rights litigation (before law school, I was an Assistant Special Master for the U.S. District Court for the District of Puerto Rico in the *Morales Feliciano* prison reform litigation).

4. I am an attorney licensed to practice law in New York and Georgia. I was first admitted to practice law in Florida in February 1997 and subsequently in the U.S. District Courts for the Middle and Southern Districts of Florida. I have since retired from the Florida Bar and from the U.S. District Courts in Florida. I have been a member of the New York Bar since May 2001. I was admitted to the Georgia Bar in October 2008. I also am admitted to practice before all U.S. District Courts in Georgia; the Western, Southern, and Eastern Districts of New York; the District of Nebraska; and the U.S. Courts of Appeals for the Third, Fifth, and Ninth, and Eleventh Circuits. Finally, I have been admitted *pro hac vice* for specific federal court cases in Alabama, Arizona, Mississippi, California, Louisiana, Oregon, Washington, Tennessee, Kentucky, New Jersey, and Missouri.

5. Upon graduation and admission to the Florida Bar, I began practicing in Belle Glade, Florida with the Migrant Farmworker Justice Project of Florida Legal Services, Inc., where I had been awarded a National Association for Public Interest Law Equal Justice Fellowship. In 1998, I moved to New York, where I continued to represent farmworkers in federal litigation until 2004, initially with the Farmworker Law Project of the Legal Aid Society of Mid-New York, Inc. and later with Farmworker Legal Services of New York, Inc. In 2004, I and my co-counsel, Patricia Kakalec, were awarded an Echoing Green Fellowship and co-founded the Workers' Rights Law Center of New York, Inc., where, as Legal Director, I represented low-wage workers in federal litigation (principally class actions) until February 2008.

6. I began working at the Southern Poverty Law Center (“SPLC”) Immigrant Justice Project practice group (“IJP”) in March 2008. Within SPLC, attorneys in the IJP practice group specialized in representing immigrant workers enforcing their civil and employment rights. I served in various roles at SPLC, including as SPLC’s Deputy Legal Director. I also was the founder and Director of SPLC’s Southeast Immigrant Freedom Initiative.

7. While at SPLC, I also worked as a Pro Bono Short Term Legal Specialist with the American Bar Association Rule of Law Initiative (“ABA-ROLI”), conducting trainings in China, Mongolia, and the Solomon Islands relating to the provision of legal services to human trafficking survivors.

8. In March 2020, I left SPLC and joined the law firm of Radford & Keebaugh, LLC in Decatur, Georgia. On October 1, 2023, Radford & Keebaugh became Radford Scott, LLP.

9. I am a Partner at Radford Scott, where I represent plaintiffs in employment and civil rights litigation.

10. I am proficient in reading, writing, and speaking the Spanish language. Therefore, a significant portion of my law practice involves representing Spanish-speaking low-wage immigrant workers in labor exploitation litigation. Because I am bilingual, I do not need to use an interpreter when communicating with my clients in Spanish. This reduces overall case costs.

11. I am recognized as an authority on litigation for labor trafficking survivors and frequently advise non-profit organizations on workers’ rights

litigation under the Trafficking Victims Protection Act (“TVPA”) and the Racketeer Influenced and Corrupt Organizations Act (“RICO”).

12. In addition to the ABA-ROLI pro bono trainings, I have presented over 80 times in the United States and Europe, principally on labor trafficking and civil RICO claims on behalf of immigrant workers, but also various other areas of expertise, including immigrant workers’ employment and civil rights.

13. I have testified about immigrant labor exploitation before the Organization for Security and Cooperation in Europe in Vienna, Austria; in the Russian Federation as part of a 2010 Bilateral Presidential Commission on Forced Labor and Prisons; and twice before the Equal Employment Opportunity Commission in Washington, DC.

14. I have authored, co-authored, and contributed chapters to multiple publications related to immigrants’ employment and civil rights, including co-authoring three editions of *Civil Litigation on Behalf of Victims of Human Trafficking* (3d Ed., SPLC 2008) and *Immigrant Labor Exploitation and Human Trafficking*, Chapter, Jill Laurie Goodman & Dorchen A. Leidholdt, Ed., *Lawyer’s Manual on Human Trafficking: Pursuing Justice for Victims*, N.Y. App. Div., 1st Dept & NY Judicial Committee on Women in the Courts (2011). Most recently, I co-authored Annie Smith & Daniel Werner, *Dismissing Human Trafficking: Forced Arbitration of Survivors’ Civil Suits*, 70 VILL. L. REV. 259 (2025).

15. I have served as counsel for plaintiffs in over eighty employment rights cases, including over forty-two cases filed as class and/or collective actions. Nearly all these cases were on behalf of immigrant workers.

16. Notably, I was lead trial attorney in *David v. Signal International, LLC* (E.D. La. 2008), a complex TVPA, discrimination, RICO, and FLSA case (collective action) on behalf of H-2B guest workers from India that led to the largest-ever jury verdict (at that time) in a labor trafficking case. For our work on this case, my team and I were awarded Public Justice's 2015 Trial Lawyer of the Year Award.

17. I have received several other significant awards, including both the Alumni Award and an Honorary Doctor of Laws from Grinnell College (my alma mater); the Ohtli Award, one of the highest honors the Government of Mexico bestows to individuals and organizations working with the Mexican community abroad; and, most recently, the Human Trafficking Legal Center honored me as the 2025 Litigator of the Year.

*Fees Awarded and Requested*

18. On February 7, 2022, the U.S. District Court for the Western District of Washington awarded my fees at a rate of \$600 per hour after our successful motion to remand the case to state court. See *3S Network, Inc. v. Zenisco, Inc.*, Case No. 2:21-cv-00971-BJR (W.D. Wash.), R. Docs. 20 (Declaration) & 25 (Order). On March 27, 2024 and April 7, 2026, the U.S. District Court for the Northern District of Georgia awarded my fees at a rate of \$600 per hour in individual (non-collective) Fair Labor Standards Act cases after entry of a default judgment. See *Hernandez v. RUTCO, LLC*, No. 4:23-cv-00159-WMR (N.D. Ga.), R. Doc. 16; *Barajas v. Leon*, No. 1:25-cv-00480-VMC (N.D. Ga.), R. Doc. 28.

19. I typically bill at \$600 per hour for individual wage and hour cases, though I plan to increase this rate in 2026. For complex class action lawsuits, I bill

at \$700-\$750 per hour. In *de la Fuente v. Columbia Recycling Corp.*, No. 4:22-cv-00256 (N.D. Ga.), this Court approved class action settlement fees petition in which I sought a lodestar rate of \$750 per hour. *Id.*, Docs. 154-1 at ¶ 31 (Werner Decl.) & 161. (Order approving class settlement). Similarly, in *Peregrina v. SL Alabama, LLC*, 3:23-cv-206-TCB-RGV (N.D. Ga.), this Court approved a class action percent contingency fee in which I submitted a lodestar cross-check rate of \$700 per hour. *Id.*, Docs. 35-2 (Werner Decl.) & 38 (Order approving class settlement). *Peregrina* settled before any defendant responded to Plaintiffs' complaint and before discovery had begun.

20. I request that the Court award me fees at a rate of \$750 per hour in this matter. This is commensurate with rates awarded in this District. *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 followings 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); *cf. Stimson v. Stryker Sales Corp.*, No. 1:17-CV-00872-JPB, 2022 WL 376375, at \*3 (N.D. Ga. Feb. 8, 2022)(in sanctions motion, approving \$780 per hour for 30-year partner).

21. During the course of my representation of the Plaintiffs in this matter, I have kept contemporaneous time records related to my work. Those time records were recorded in Clio, Radford Scott’s – and previously Radford & Keebaugh’s – computerized timekeeping software, during the normal course and scope of my work. Further, starting in January 2024, I have used WiseTime, an automated time-tracking application that contemporaneously records my activity across applications. TimeWise entries sync with Clio.

22. I also have supervised the work of other Radford Scott LLP attorneys and paralegals. They also have maintained contemporaneous time records using Clio.

23. The lodestar billing rates for all Radford Scott LLP attorneys and paralegals who have worked on this case, and their corresponding fees, are:

<b>Attorney</b>	<b>Position</b>	<b>Experience</b>	<b>Rate</b>	<b>Hours</b>	<b>Total</b>
Daniel Werner	Partner	29 years	\$750	362.8	\$272,100.00
James Radford	Partner	18 years	\$600	8.23	\$4,938.00
Jusu Sirleaf	Bilingual Paralegal	8 years	\$125	3.7	\$462.50
Isabella Valadez	Bilingual Paralegal	3 years	\$125	1.2	\$150.00
<b>TOTAL</b>					<b>\$277,650.50</b>

24. The Radford Scott LLP time records for all attorneys and paralegals are attached as **Exhibit DW-1**. Information that is privileged or subject to attorney

work product or other protections set forth in the Federal Rules of Civil Procedure has been redacted.

25. My team at Radford Scott and I forewent other fee and profit-generating opportunities in pursuit of this case.

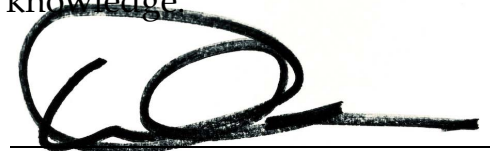
26. Further, Radford Scott is helping to overseeing the administration of class notice, moving for final approval, and (if approved) distribution of the settlement funds. Based on past experience, I anticipate our firm will accrue at least an additional \$20,000.00 in fees.

27. Radford Scott, LLP's costs thus far are \$358.00 and were reasonably and necessarily incurred on behalf of the class. The Radford Scott LLP records of all costs accrued to date are attached as **Exhibit DW-2**.

28. Prior to beginning representation of the named Plaintiffs in this matter, I entered into contingency fee agreements with them providing for payment of the greater of 40 percent of any settlement fund or such hourly fees awarded separately from the fund. We advanced all costs of the litigation. If we had not achieved a recovery, we would not have received any attorneys' fees.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: April 22, 2026



Daniel Werner

Type	Date	Hours	Description	Rate (\$)	Billable (\$)	User
		<b>375.93</b>			<b>\$ 277,650.50</b>	
TimeEntry	8/10/22	0.3	Research/prepare for intake interview.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	8/10/22	1.2	Intake interview.	\$ 750.00	\$ 900.00	Daniel Werner
TimeEntry	8/10/22	0.3	Email to Heber re retainer/next steps.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	8/10/22	0.4	Respond to Heber's questions re [REDACTED]	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	8/24/22	1.3	Intake interview with Luis Adrian Salazar	\$ 750.00	\$ 975.00	Daniel Werner
TimeEntry	8/24/22	2	Email retainer (.2) and document sharing info (.2) to LAS.	\$ 750.00	\$ 1,500.00	Daniel Werner
TimeEntry	8/26/22	1.5	Intake call with Veronica Olan Castillo (1.3); follow-up WhatsApp message re same (.2).	\$ 750.00	\$ 1,125.00	Daniel Werner
TimeEntry	8/26/22	0.2	Email to VOC re retainer.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	8/30/22	0.4	WhatsApp messages with Heber re [REDACTED]	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	8/30/22	1.5	meet with Dan re litigation strategy, discuss hub and spoke strategy	\$ 600.00	\$ 900.00	James Radford
TimeEntry	8/30/22	1.2	legal research re: enterprise coverage under RICO	\$ 600.00	\$ 720.00	James Radford
TimeEntry	8/30/22	1.5	Meet with James re litigation strategy, next steps.	\$ 750.00	\$ 1,125.00	Daniel Werner
TimeEntry	9/1/22	0.2	Supervise signing request for [REDACTED].	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	9/2/22	1	meeting with Hall Lampros	\$ 600.00	\$ 600.00	James Radford
TimeEntry	9/2/22	1	meeting with Hall Lampros	\$ 750.00	\$ 750.00	Daniel Werner
TimeEntry	9/6/22	0.5	WhatsApp messages with Heber re case status/next steps.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	9/7/22	0.5	Call with Hall Lampros/CDM re co-counseling & next steps.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	9/7/22	0.3	Call with Ben Botts (CDM) re co-counseling/next steps.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	9/12/22	0.8	Emails to RK admin team re intake call processes (.5 .3).	\$ 750.00	\$ 600.00	Daniel Werner
TimeEntry	9/16/22	1.2	Call with Hall Lampros/CDM re co-counseling & next steps.	\$ 750.00	\$ 900.00	Daniel Werner
TimeEntry	9/16/22	0.5	Call with Leon Aguiere (witness) re facts.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	10/3/22	0.5	meeting with co-counsel	\$ 600.00	\$ 300.00	James Radford
TimeEntry	10/3/22	0.5	Meet with James and Hall & Lamprose (Rachel and Chris) re case strategy/next steps.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	10/4/22	0.4	Draft Notice of Appearance (.3); CM/ECF file same (.1).	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	10/4/22	0.7	Draft update WhatsApp message to clients re co-counsel, next steps, timeline.	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	10/4/22	0.6	Email to H&L and CDM co-counsel with links to shared client documents/suggestion re document naming convention.	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	10/5/22	0.4	team meeting re strategy	\$ 600.00	\$ 240.00	James Radford
TimeEntry	10/19/22	0.5	Team meeting	\$ 600.00	\$ 300.00	James Radford
TimeEntry	11/1/22	2.5	Review/edit amended complaint (including inserting clients' facts).	\$ 750.00	\$ 1,875.00	Daniel Werner
TimeEntry	11/1/22	2.1	WhatsApp message exchanges with LAS (.5); JMRRM (.8), HZ (.8) re case facts for amended complaint.	\$ 750.00	\$ 1,575.00	Daniel Werner
TimeEntry	11/2/22	0.33	team meeting	\$ 600.00	\$ 198.00	James Radford
TimeEntry	11/2/22	0.4	Meeting with co-counsel re amended complaint/next steps	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	11/2/22	2.9	Draft Veronica Olan Castillo facts for amended complaint	\$ 750.00	\$ 2,175.00	Daniel Werner
TimeEntry	11/2/22	0.7	Emails to co-counsel re amended complaint (.3 .2 .2).	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	11/2/22	0.8	WhatsApp messages with Veronica re facts for amended complaint.	\$ 750.00	\$ 600.00	Daniel Werner
TimeEntry	11/2/22	0.7	Draft/submit EEOC charge (& obtain Veronica's signature).	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	11/2/22	0.5	Draft/circulate FLSA Consents to Sue	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	11/2/22	5.8	Add Olan's claims to amended complaint + TVPA and tax fraud (5.8).	\$ 750.00	\$ 4,350.00	Daniel Werner
TimeEntry	11/2/22	2.1	WhatsApp chats/records review with Salazar, Zapata, and Olan re facts for amended complaint.	\$ 750.00	\$ 1,575.00	Daniel Werner
TimeEntry	11/2/22	0.7	Emails to co-counsel re amended complaint.	\$ 750.00	\$ 525.00	Daniel Werner

TimeEntry	11/9/22	0.6	team meeting	\$ 600.00	\$ 360.00	James Radford
TimeEntry	11/9/22	0.8	Call with co-counsel re 2d amended complaint/case schedule.	\$ 750.00	\$ 600.00	Daniel Werner
TimeEntry	11/9/22	0.3	WhatsApp messages to clients re amended complaint.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	11/9/22	0.7	Edit Amended EEOC Charges (VOC) (.4); WhatsApp messages to VOC re same (.3).	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	11/11/22	0.7	Call with John Newbill (USDOL) & Ben Botts re collaboration, allegations in lawsuit (.6); follow-up email to John re same (.1).	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	11/11/22	1	Finalize amended EEOC charges (.2); email to Brian Sutherland re same (.2); draft request for Notice of Right to Sue (.3); email to EEOC attaching amended charges and request for NRTS (.2); email to co-counsel re same (.1).	\$ 750.00	\$ 750.00	Daniel Werner
TimeEntry	11/14/22	2.5	Draft 2d amended complaint.	\$ 750.00	\$ 1,875.00	Daniel Werner
TimeEntry	11/15/22	2.7	Draft Second Amended Complaint (2.1); email to co-counsel explaining changes (.6).	\$ 750.00	\$ 2,025.00	Daniel Werner
TimeEntry	11/16/22	0.7	team meeting	\$ 600.00	\$ 420.00	James Radford
TimeEntry	11/16/22	0.7	Zoom with co-counsel re amended complaint, additional plaintiffs/defendants, potential settlement.	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	11/17/22	0.8	RICO punitive damages research (.5); email to co-counsel re same (.3).	\$ 750.00	\$ 600.00	Daniel Werner
TimeEntry	11/17/22	0.3	Email to co-counsel responding to Ben's edits of amended complaint.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	11/22/22	0.5	Emails to co-counsel re new clients/potential claims (.2 .3).	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	11/30/22	0.7	Planning call with co-counsel re amending complaint, adding parties, settlement, next steps.	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	11/30/22	0.5	team meet	\$ 600.00	\$ 300.00	James Radford
TimeEntry	12/1/22	0.3	Review settlement discussion talking points (.2); email to co-counsel re same (.1).	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	12/14/22	0.5	Call with co-counsel re amended complaint.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	12/16/22	6.7	Detailed edit/review of 2d amended complaint (6.5); email to co-counsel re same (.2).	\$ 750.00	\$ 5,025.00	Daniel Werner
TimeEntry	12/16/22	2	Call to review edits in SAC.	\$ 750.00	\$ 1,500.00	Daniel Werner
TimeEntry	12/16/22	2	Draft RICO conspiracy allegations for SAC.	\$ 750.00	\$ 1,500.00	Daniel Werner
TimeEntry	12/16/22	1.5	Prepare pleading charts for SAC.	\$ 750.00	\$ 1,125.00	Daniel Werner
TimeEntry	12/16/22	0.5	Emails with co-counsel re SAC (.2 .1 .2).	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	12/16/22	0.7	Draft TOC, rework headings (.5); email to co-counsel re same (.2).	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	1/22/23	2.3	Draft opposition to motion to exceed page limits (2.1); email to co-counsel re same (.2).	\$ 750.00	\$ 1,725.00	Daniel Werner
TimeEntry	1/23/23	0.7	Final edits to page limit motion opposition (.3); CM/ECF File same (and add parties) (.2); email to co-counsel re J. Vineyard's proposal for 60 pages (.2).	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	1/25/23	1.4	Prepare shared master folder structure/agendas (1.2); email to co-counsel re same (.2).	\$ 750.00	\$ 1,050.00	Daniel Werner
TimeEntry	1/25/23	0.9	Call with co-counsel re case strategy, next steps.	\$ 750.00	\$ 675.00	Daniel Werner
TimeEntry	1/27/23	1	Review Mobis MTD.	\$ 750.00	\$ 750.00	Daniel Werner
TimeEntry	1/30/23	0.3	WhatsApp message to Veronica re case update.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	1/31/23	0.4	Call with co-counsel re MTDs	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	2/1/23	1	Call with federal investigators [REDACTED].	\$ 750.00	\$ 750.00	Daniel Werner
TimeEntry	2/7/23	1	team call	\$ 600.00	\$ 600.00	James Radford
TimeEntry	2/7/23	2.2	Prepare notes/initial legal research re MTDs (RICO and IRC claims)	\$ 750.00	\$ 1,650.00	Daniel Werner
TimeEntry	2/7/23	1	Call with co-counsel to review/plan responses to MTDs.	\$ 750.00	\$ 750.00	Daniel Werner
TimeEntry	2/20/23	4.2	Draft in pari delicto section of MTD opposition brief; related legal research.	\$ 750.00	\$ 3,150.00	Daniel Werner
TimeEntry	2/22/23	5.2	Draft MTD opposition section re RICO extraterritoriality; related legal research.	\$ 750.00	\$ 3,900.00	Daniel Werner
TimeEntry	2/22/23	3.8	Draft false information returns section of MTD opposition; related legal research.	\$ 750.00	\$ 2,850.00	Daniel Werner
TimeEntry	2/23/23	4.1	Draft false information returns section of MTD opposition; related legal research.	\$ 750.00	\$ 3,075.00	Daniel Werner
TimeEntry	3/1/23	2.8	Spreadsheet/unpaid wages calculations; related document review.	\$ 750.00	\$ 2,100.00	Daniel Werner

TimeEntry	3/1/23	2.9	Draft MTD opp section re unpaid wages.	\$ 750.00	\$ 2,175.00	Daniel Werner
TimeEntry	3/1/23	1.5	Emails to co-counsel re MTD opposition sections (.8 .4 .3)	\$ 750.00	\$ 1,125.00	Daniel Werner
TimeEntry	3/1/23	0.4	Review/edit MTD opposition sections.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	3/2/23	2.5	Draft 3d amended complaint	\$ 750.00	\$ 1,875.00	Daniel Werner
TimeEntry	3/3/23	2.9	Edit 3d amended complaint (2.6); emails to co-counsel re same (.3).	\$ 750.00	\$ 2,175.00	Daniel Werner
TimeEntry	3/4/23	6.2	Edit 3d amended complaint (5.4); emails to co-counsel re same (.8).	\$ 750.00	\$ 4,650.00	Daniel Werner
TimeEntry	3/5/23	0.6	Draft 3d amended complaint.	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	3/5/23	0.1	Email re Job Knowledge MTD extension.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	3/7/23	0.6	Call with co-counsel re MTD opposition/amended complaint.	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	3/7/23	0.8	Edit 3d amended complaint	\$ 750.00	\$ 600.00	Daniel Werner
TimeEntry	3/8/23	0.5	Call with Ben to discuss MTD opposition/amended complaint.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	3/8/23	3.7	Edit/draft 3d amended complaint (3.2); detailed email to co-counsel re same (.5).	\$ 750.00	\$ 2,775.00	Daniel Werner
TimeEntry	3/8/23	1	WhatsApp messages with Zapata re recruitment, documents (.5); review documents (.5).	\$ 750.00	\$ 750.00	Daniel Werner
TimeEntry	3/8/23	1.2	WhatsApp messages with Olan re recruitment, documents (.5); review documents (.7).	\$ 750.00	\$ 900.00	Daniel Werner
TimeEntry	3/8/23	0.9	WhatsApp messages with Ramirez re recruitment, documents (.5); review documents (.4).	\$ 750.00	\$ 675.00	Daniel Werner
TimeEntry	3/9/23	1.2	Review/edit opp to Allswell MTD (.7); email to co-counsel re edits (.5).	\$ 750.00	\$ 900.00	Daniel Werner
TimeEntry	3/9/23	0.2	Email to Ben re contract claims.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	3/9/23	0.6	Client wage disparity calculations; email to Rachel re same.	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	3/9/23	1.2	Call with co-counsel re MTD oppositions/amended complaint.	\$ 750.00	\$ 900.00	Daniel Werner
TimeEntry	3/9/23	0.2	Email to Rachel re wage statement.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	3/9/23	0.1	Email to co-counsel re TAC.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	3/9/23	0.2	Email to Rachel re exhibits.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	3/9/23	0.2	Edit claims chart.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	3/9/23	5	Near final revision of 3d amended complaint.	\$ 750.00	\$ 3,750.00	Daniel Werner
TimeEntry	3/9/23	1.8	Review/add exhibits; modify TAC accordingly.	\$ 750.00	\$ 1,350.00	Daniel Werner
TimeEntry	3/9/23	0.7	Prepare Table of Exhibits.	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	3/9/23	1.1	Emails to co-counsel re TAC (.3 .2 .2 .1 .3)	\$ 750.00	\$ 825.00	Daniel Werner
TimeEntry	3/10/23	0.9	Review-edit draft Motion to Amend (.7); email to co-counsel re same (.2).	\$ 750.00	\$ 675.00	Daniel Werner
TimeEntry	3/10/23	2.6	Review Perez documents/recalculate unpaid wages (1); draft unpaid wages section of Mobis MTD opposition (1.1); emails to co-counsel re same (.3 .2)	\$ 750.00	\$ 1,950.00	Daniel Werner
TimeEntry	3/10/23	0.5	Review Ben email re TAC; email response.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	3/10/23	1.8	Finalize TAC, sync with MTD oppositions.	\$ 750.00	\$ 1,350.00	Daniel Werner
TimeEntry	3/10/23	0.8	Emails to co-counsel re MTD oppositions and MTA/TAC (.2 .3 .3)	\$ 750.00	\$ 600.00	Daniel Werner
TimeEntry	3/10/23	1.5	Final review/preparation of MTA documents for filing (1); CM/ECF file same (.5).	\$ 750.00	\$ 1,125.00	Daniel Werner
TimeEntry	3/16/23	0.2	Co-counsel call re next steps.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	3/17/23	2.5	Draft motion for default/for order to show cause re AGWM/related legal research (2); draft proposed orders (.2 .3).	\$ 750.00	\$ 1,875.00	Daniel Werner
TimeEntry	3/22/23	0.2	Case planning call with Rachel and Chris.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	3/27/23	1	Review draft Zapata [REDACTED]; email to Hannah M. re same.	\$ 750.00	\$ 750.00	Daniel Werner
TimeEntry	4/10/23	1.4	Review draft opposition to stay motion (1); emails to co-counsel re same (.2 .2)	\$ 750.00	\$ 1,050.00	Daniel Werner
TimeEntry	4/19/23	0.3	Call with co-counsel re motion to dismiss oppositions, next steps, 216(b) motion.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	4/24/23	0.4	Team call re MTD oppositions.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	4/29/23	0.8	Edit Opp. to Allswell MTD in pari delicto and extraterritoriality sections (.8).	\$ 750.00	\$ 600.00	Daniel Werner

TimeEntry	4/29/23	8.9	Rewrite Opp. to Allswell MTD Section 7434 sections, including legal research (8.5); email to co-counsel re same (.4).	\$ 750.00	\$ 6,675.00	Daniel Werner
TimeEntry	5/17/23	0.3	Team meeting re MTD oppositions, next steps.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	5/18/23	0.3	Call with Ben Botts re FLSA preemption question.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	5/26/23	0.2	Call with Chris hall re MTD opposition.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	11/1/23	0.1	WhatsApp message with Heber re potential witness.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	11/28/23	0.3	Review EEOC [REDACTED] (.2); email to co-counsel re same (.1).	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	11/28/23	0.4	WhatsApp messages to Heber re [REDACTED] (.4); emails to [REDACTED] re same (.2).	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	12/19/23	0.5	Edit Notice of Supplemental Authority (.3); email to co-counsel re same (.2).	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	12/20/23	0.1	Email to co-counsel re statement of supplemental authority.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	12/21/23	0.8	Legal research re filing supplemental authority (.4); emails to co-counsel re same in response to defendants' request to file 15-page brief (.2 .2).	\$ 750.00	\$ 600.00	Daniel Werner
TimeEntry	1/2/24	0.4	Reviewing motion to dismiss order.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	1/2/24	0.2	Email to co-counsel re MTD order.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	1/2/24	0.2	Teams message to firm co-counsel re MTD order.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	1/2/24	0.1	Reviewing client contact and status information in Microsoft Excel.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	1/2/24	0.2	List-serve email re MTD order.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	1/2/24	0.3	Additional review of MTD order; discussion with James re same.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	1/3/24	0.3	Zoom call with co-counsel re R&R, next steps, discovery, conditional cert.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	1/3/24	0.2	Email to [REDACTED] re R&R denying MTD.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	1/5/24	0.7	WhatsApp messages with Veronica Olan (.3) and Heber Zapata (.2) re case update; emails with co-counsel [REDACTED] (.2)	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	1/5/24	0.3	Emails with co-counsel re defs' request for additional pages/extension on objections to R&R	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	1/8/24	0.2	Review proposed email re 216(b) motion (.1); email to Rachel re same (.1).	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	1/11/24	0.2	Email to Brian re [REDACTED].	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	1/12/24	0.3	Call with [REDACTED] re TN cases (.4); follow-up research and email to [REDACTED] re [REDACTED]	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	1/17/24	0.2	Zoom with co-counsel re collective action cert, settlement, discovery, next steps.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	1/23/24	0.4	Emails to EEOC re Olan [REDACTED] (.3 .1).	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	1/23/24	0.7	Meet with Veronica Olan and Heber Zapata re case status/next steps.	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	1/24/24	0.1	Weekly Zoom with Co-Counsel re case updates and strategy/next step.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	1/25/24	0.6	Email correspondence with EEOC re [REDACTED] Veronica Olan (.2 .2); WhatsApp messages with Veronica Olan re same (.2).	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	1/25/24	0.1	Emails with Abby (CDM) re Veronica EEOC interview.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	1/31/24	0.3	Emails to co-counsel re check-in meeting and to-do list/next steps (.2 .1).	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	2/1/24	0.7	Email to EEOC investigator re Veronica Olan Castillo (.2); WhatsApp correspondence with Veronica re same (.3); email to Abby re same (.1); email to Rachel re same (.1).	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	2/2/24	0.3	Meeting with co-counsel (Brian, Ricardo, Abby) re case strategy, next steps.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	2/4/24	0.4	Draft R&R objection re 7434 claim.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	2/7/24	4.4	Drafting objections to RR (2.1); related legal/document research (2); email to list-serve re statutory damages cases (no case name) (.2 .1).	\$ 750.00	\$ 3,300.00	Daniel Werner
TimeEntry	2/8/24	1.1	Legal research, including review of congressional record, in support of R&R objections.	\$ 750.00	\$ 825.00	Daniel Werner
TimeEntry	2/8/24	2.6	Draft R&R objection re 7434 claim (2); review/edit objections to contract R&R/consolidate sections (.6).	\$ 750.00	\$ 1,950.00	Daniel Werner
TimeEntry	2/8/24	0.3	WhatsApp correspondence with [REDACTED] (.2); email to co-counsel re same (.1).	\$ 750.00	\$ 225.00	Daniel Werner

TimeEntry	2/8/24	0.2	Emails to co-counsel re R&R objections (.1 .1).	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	2/9/24	0.1	Email to co-counsel re communication from [REDACTED]	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	2/9/24	0.2	Emails to co-counsel re objections to R&R (.1 .1)	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	2/13/24	0.2	Email to Mexican consulate re [REDACTED]	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	2/13/24	0.1	WhatsApp correspondence with Veronica Olan re Title VII claim	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	2/14/24	0.1	Email to co-counsel re Luis Salazar contact.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	2/14/24	0.3	Zoom with co-counsel re case strategy and planning, next steps, legal arguments, settlement.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	2/15/24	0.2	Call with Abby re Veronica Olan (.1); f/u email re [REDACTED] (.1).	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	2/15/24	0.1	Email to co-counsel re R&R objections extension.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	2/21/24	0.3	Zoom meeting with Rachel and Henna re R&R Objection oppositions.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	2/22/24	0.3	Email correspondence with co-counsel re Olan Castillo [REDACTED].	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	2/23/24	0.3	Email correspondence with Brian Sutherland re [REDACTED] (.1); document review re same (.2).	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	2/28/24	0.2	Zoom check-in re case strategy.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	3/4/24	2	Draft opposition to Allswell/SPJ objections to R&R (RICO extraterritoriality); related legal research.	\$ 750.00	\$ 1,500.00	Daniel Werner
TimeEntry	3/5/24	1.2	Draft R&R Objections opposition (extraterritoriality) (.5); related legal research (.7)	\$ 750.00	\$ 900.00	Daniel Werner
TimeEntry	3/7/24	0.5	Drafting opposition to special jurisdiction objection; researching Yegiazaryan v. Smagin case on Supreme Court via Westlaw.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	3/8/24	1.7	Draft opposition to Allswell/SPJ objections to R&R (RICO extraterritoriality); related legal research.	\$ 750.00	\$ 1,275.00	Daniel Werner
TimeEntry	3/9/24	1.4	Draft opposition to Allswell/SPJ objections to R&R (RICO extraterritoriality); related legal research.	\$ 750.00	\$ 1,050.00	Daniel Werner
TimeEntry	3/10/24	0.7	Draft opposition to Allswell/SPJ objections to R&R (RICO extraterritoriality); related legal research.	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	3/10/24	0.9	Draft opposition to Allswell/SPJ objections to R&R (RICO lost wages); related legal research.	\$ 750.00	\$ 675.00	Daniel Werner
TimeEntry	3/10/24	2	Draft opposition to Allswell/SPJ objections to R&R (in pari delicto); related legal research.	\$ 750.00	\$ 1,500.00	Daniel Werner
TimeEntry	3/11/24	0.3	Draft opposition to Allswell/SPJ objections to R&R (in pari delicto); related legal research.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	3/11/24	0.2	Edit opposition to Allswell/SPJ objections to R&R (RICO extraterritoriality); related legal research.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	3/12/24	0.4	Final line edit of responses to pari delicto and extraterritoriality objections (.6); email to co-counsel re same (.1).	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	3/12/24	0.7	Draft opposition to Allswell/SPJ objections to R&R (wage calculations); related legal research.	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	3/12/24	0.4	Emails to co-counsel re wage calculations (.2 .2).	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	3/13/24	0.6	Edit response to Kia R&R objections (.5); email to co-counsel re same (.1).	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	3/13/24	1.4	Draft opposition to Allswell/SPJ objections to R&R (wage calculations); related legal/document research.	\$ 750.00	\$ 1,050.00	Daniel Werner
TimeEntry	3/13/24	0.4	Zoom with co-counsel re R&R objections, case planning.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	3/13/24	0.2	WhatsApp message to plaintiff Veronica Olan responding to her questions re [REDACTED].	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	3/13/24	0.2	Email to co-counsel re R&R objection opposition (scheduled send for next morning).	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	3/14/24	0.3	WhatsApp messages with Heber Zapata re [REDACTED] (.1 .1); email to co-counsel re same (.1).	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	3/14/24	0.1	Email to co-counsel re Local Rule re brief formatting.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	3/14/24	0.2	Email to Nicole Weitnauer re [REDACTED].	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	3/14/24	1.4	Review/edit response to Mobis R&R objections (1.1); emails to co-counsel re same (.1 .2).	\$ 750.00	\$ 1,050.00	Daniel Werner
TimeEntry	3/14/24	0.2	Review edits of Response to SPJ R&R Objections.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	3/14/24	0.4	Draft opposition to Allswell/SPJ objections to R&R (wage calculations); related legal/document research.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	3/15/24	0.1	Email to co-counsel re edits to Mobis R&R objection response.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	3/18/24	0.1	WhatsApp message to Heber re [REDACTED], scheduling call.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	3/25/24	0.3	WhatsApp messages with Heber re [REDACTED] (.1); emails to co-counsel re same (.1 .1).	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	4/3/24	0.3	Review WhatsApp message from Veronica Olan (.1); review previous emails re [REDACTED] (.1); email to Rachel re same (.1).	\$ 750.00	\$ 225.00	Daniel Werner

TimeEntry	4/12/24	0.4	Review [REDACTED] (.1); WhatsApp messages to Veronica Olan (.2) y Heber Zapata (.1) re same.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	5/2/24	0.4	WhatsApp communications with Heber re [REDACTED].	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	5/10/24	0.5	Call with Nicole Weitnauer re [REDACTED].	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	5/16/24	0.3	Emails to co-counsel re [REDACTED] (.1 .2).	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	5/16/24	0.8	Review documents/prepare notes for call with [REDACTED] re [REDACTED].	\$ 750.00	\$ 600.00	Daniel Werner
TimeEntry	5/16/24	0.7	Call with [REDACTED] re [REDACTED].	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	5/28/24	1	Review Court decision re MTD R&R; email/Teams messages to co-counsel re same.	\$ 750.00	\$ 750.00	Daniel Werner
TimeEntry	5/29/24	0.5	Zoom with co-counsel re strategy following order on MTD.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	6/4/24	2.3	Detailed review of court order on Defendants' MTD; related legal research (1.4); detailed email to co-counsel explaining position on motion to reconsider/amending complaint (.9).	\$ 750.00	\$ 1,725.00	Daniel Werner
TimeEntry	6/5/24	0.3	Finalize email re MTD/motion to reconsider/amending complaint (12 am)	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	6/5/24	0.4	Zoom with co-counsel re motion to reconsider/amending complaint.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	6/5/24	0.6	Emails to co-counsel re motion to reconsider (.3 .3).	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	6/6/24	0.2	Review EEOC determination letter (.1); email to co-counsel re same (.1).	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	6/8/24	0.4	Compile plaintiff contact list for group communications/updates.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	6/9/24	1	Create WhatsApp group for clients/counsel (.3); draft case update message for clients (translated), including related document review (.6); message to Abby re WhatsApp group (.1).	\$ 750.00	\$ 750.00	Daniel Werner
TimeEntry	6/12/24	0.2	Email to co-counsel re case planning meeting agenda.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	6/12/24	0.4	Review/edit MTR (.3); email to co-counsel re same (.1).	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	6/12/24	0.3	Zoom with co-counsel re case strategy/next steps.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	6/18/24	0.1	Email to [REDACTED] re [REDACTED]	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	6/24/24	0.5	Emails to co-counsel re defendants' requested extension (.1 .2); related legal research (.2).	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	6/26/24	0.2	Review opposition to extension motion (.1); email to Rachel re same (.1).	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	7/11/24	0.1	Reviewing JKL settlement offer document.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	7/12/24	0.1	Review order on motion to reconsider (.1); email to co-counsel re same (.1).	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	7/24/24	0.2	Zoom with Abby and Chris re case planning, settlement, next steps.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	7/31/24	0.2	Call with Mike Lucas re potential mediation.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	7/31/24	0.2	Email to co-counsel re settlement.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	7/31/24	0.4	Email to Hannah re case update/status.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	8/2/24	0.3	Emails to co-counsel re LR 16.1 conference/settlement (.2 .1).	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	8/7/24	1.1	Zoom meeting with co-counsel re case strategy/settlement/26(f) conference.	\$ 750.00	\$ 825.00	Daniel Werner
TimeEntry	8/14/24	0.9	Review/edit JPR (.7); email to Rachel re same (.1); email to all counsel re same (.1).	\$ 750.00	\$ 675.00	Daniel Werner
TimeEntry	8/14/24	0.3	Zoom meeting with Chris, Abby, and Henna re case strategy/next steps.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	8/14/24	0.2	Compile template 216(b) motions (.1); email to Chris re same (.1).	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	8/15/24	0.3	Review JPR/prepare for 26(f) conference.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	8/15/24	0.6	R. 26(f) conference with all counsel.	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	8/21/24	0.2	Call with Co-Counsel re case strategy/next steps.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	8/26/24	0.2	Zoom with co-counsel re strategy for FLSA 216(b) Motion.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	8/28/24	0.4	Review proposed JPR (.1); review proposed initial document request for settlement evaluation (.1); email to Rachel re same (.2).	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	8/28/24	0.4	Zoom with co-counsel re conditional cert motion, case strategy, discovery, and settlement.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	9/4/24	0.2	Zoom with co-counsel re settlement, briefing, next steps.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	9/4/24	0.4	Teams messages to Justin, James, and Elaine re MTD opposition briefing.	\$ 750.00	\$ 300.00	Daniel Werner

TimeEntry	9/4/24	0.2	Email to Chris attaching template RFPs and Rogs.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	9/16/24	0.6	Edit/review initial disclosures (.4); email to co-counsel re same (.2).	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	9/18/24	0.5	Zoom with co-counsel re case planning, discovery, conditional cert motion.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	9/20/24	0.5	Call with Mike Lucas re potential settlement.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	9/20/24	0.5	Detailed to co-counsel re call with Mike Lucas/potential settlement.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	9/23/24	0.3	Legal research re 216(b) tolling (.1); email to Chris re same (.2).	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	9/24/24	0.4	Emails to co-counsel re mediation planning meeting (.1 .1); emails to Mike Lucas re same (.1 .1).	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	9/25/24	0.2	Email to co-counsel (.1) and Mike Lucas (.1) re mediation planning meeting.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	9/25/24	0.5	Legal research re tolling agreements for 216(b) opt-ins (.3); email to co-counsel re same (.2).	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	9/25/24	1.2	Zooms with co-counsel re settlement/mediation and next steps (.5 .2); Zoom with Michael and Sarah re mediation (.5).	\$ 750.00	\$ 900.00	Daniel Werner
TimeEntry	9/30/24	0.4	Emails to co-counsel re mediation dates (.1 .1); draft email to OC re same (.2).	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	10/2/24	0.2	Zoom meeting with co-counsel re case strategy, settlement, next steps.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	10/3/24	0.2	Email to co-counsel re [REDACTED]	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	10/9/24	0.2	Zoom with co-counsel re settlement [REDACTED] (.4); amending complaint & 26(f) conference [REDACTED] (.2).	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	10/9/24	0.3	Draft additional language for Chris's email to OC re conditional certification.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	10/16/24	2	Review/edit/translate Zapata and Olan declarations, including related document review (.9); WhatsApp messages to Zapata/Olan re same & case update (.4); send declarations for signature (.2); emails to co-counsel re same & [REDACTED] (.3 .1 .1)	\$ 750.00	\$ 1,500.00	Daniel Werner
TimeEntry	10/16/24	0.3	Teams meeting with co-counsel re case strategy/next steps.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	10/22/24	0.1	Email to Chris re conditional cert motion	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	10/22/24	0.2	Review calendar (.1); email to Chris re availability for proposed mediation dates (.1).	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	11/1/24	0.4	Review/edit joint motion for stay (.3); email to co-counsel re same (.1).	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	11/5/24	0.4	Review draft joint motion for stay (.2); text message correspondence with Chris Hall re same (.2).	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	11/6/24	0.2	Zoom with co-counsel re settlement, next steps.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	11/20/24	0.2	Zoom with co-counsel re settlement/mediation preparation.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	11/27/24	0.4	WhatsApp exchange with Veronica Olan re case update; next steps.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	12/11/24	0.1	Email to Chris Hall re R. 408 agreement.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	12/11/24	0.1	Zoom meeting with co-counsel re strategy/next steps.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	1/8/25	0.4	Call with co-counsel re mediation/next steps.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	1/14/25	0.2	Review/respond to email correspondence re postponing mediation.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	1/15/25	0.3	Meet with co-counsel re case strategy/next steps	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	1/16/25	0.1	Email to co-counsel re mediation dates.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	1/17/25	0.2	Review calendar/email to co-counsel re new mediation dates.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	1/27/25	1.1	WhatsApp correspondence with Veronica Olan re [REDACTED] (.7); email and Signal messages with Abby and Julia re same (.4)	\$ 750.00	\$ 825.00	Daniel Werner
TimeEntry	1/29/25	0.4	Zoom with co-counsel re next steps.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	1/29/25	0.4	Call from [REDACTED] reporter re investigation.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	1/29/25	0.4	WhatsApp messages to Veronica and Heber re postponement of mediation, participation in mediation.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	2/3/25	0.8	WhatsApp messages to Heber and Veronica responding to questions re mediation/settlement.	\$ 750.00	\$ 600.00	Daniel Werner
TimeEntry	2/5/25	0.1	Message to Abby and Julia re Veronica Olan communications.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	2/12/25	0.2	Zoom meeting with co-counsel re case updates; next steps.	\$ 750.00	\$ 150.00	Daniel Werner

TimeEntry	2/17/25	0.1	Email to co-counsel re call with OC.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	3/5/25	0.5	Download/initial review of defendants' pre-mediation production (.3); email to co-counsel re same (.1); email to co-counsel sharing link to production (.1).	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	3/5/25	0.8	Call with co-counsel re mediation (.5 with Julia and Rachel; .3 with Brian).	\$ 750.00	\$ 600.00	Daniel Werner
TimeEntry	3/12/25	0.7	Review Kemp v. AT&T 11th Circuit appeal re GA RICO punitive damages (.2); Zoom with co-counsel re mediation/settlement position.	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	3/13/25	0.4	Download/share defendant's doc production (.2); emails to co-counsel re same (.1 .1).	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	3/18/25	0.3	Email to Rachel re Allswell documents.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	3/19/25	0.5	Participating in a Zoom meeting and reviewing emails in Outlook.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	3/19/25	0.7	Prepare documents on Everlaw for mediation/settlement review (.4); Zoom with co-counsel re same (.3).	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	3/19/25	0.4	Set up mediation-related documents on Everlaw for review/conduct review.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	3/20/25	0.2	Review Everlaw database (.1); email to Rachel re document review timing (.1).	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	3/21/25	0.4	Email to co-counsel re Allswell document non-production for mediation (.1); draft email response to Michael Cohen's update (.3).	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	3/24/25	0.2	Meet with Jusu re mediation document review/Everlaw coding.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	3/24/25	0.4	Email to OC re mediation documents.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	3/24/25	0.2	Meet with Dan regarding case work instructions	\$ 125.00	\$ 25.00	Jusu Sirleaf
TimeEntry	3/26/25	0.6	Email to co-counsel re mediation documents (.2); email to OC re same (.4).	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	3/26/25	0.3	Zoom meeting with co-counsel re mediation planning.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	4/2/25	0.5	Document review/prep on Everlaw.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	4/2/25	0.2	Email to co-counsel re [REDACTED].	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	4/2/25	0.5	Meeting with co-counsel re mediation prep/document review.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	4/4/25	0.2	Review Julia NOA (.1); email to Julia re same & review of mediation docs (.1).	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	4/6/25	1	Prepare spreadsheet calculations for mediation/settlement (.8); email to co-counsel re same (.2).	\$ 750.00	\$ 750.00	Daniel Werner
TimeEntry	4/6/25	0.4	Review Allswell productions; Download Allswell production; email to Rachel re same & [REDACTED].	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	4/6/25	0.6	Calculate fees/costs to date (.4); email to co-counsel re same (.2).	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	4/6/25	1.2	Additional spreadsheet calculations & review/processing of Allswell payroll records (.9); emails to co-counsel re same (.3).	\$ 750.00	\$ 900.00	Daniel Werner
TimeEntry	4/7/25	0.5	Review WhatsApp client correspondence; email to co-counsel re client communications.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	4/7/25	0.6	Additional review of Allswell records; email to co-counsel re same.	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	4/7/25	0.2	Email to Julia re billing rates.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	4/8/25	0.6	Draft WhatsApp message to clients with [REDACTED] (.4); email to co-counsel re same (.1).	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	4/8/25	0.5	Draft letter for Heber Zapata requesting [REDACTED] (.3); WhatsApp messages with Heber re same & info re mediation (.2).	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	4/9/25	0.8	Zoom meeting with co-counsel re mediation prep.	\$ 750.00	\$ 600.00	Daniel Werner
TimeEntry	4/9/25	0.3	WhatsApp messages with Heber Zapata re [REDACTED].	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	4/10/25	1	Reviewed Kia docs in EverLaw. watched the training videos to split the .pdf files into separate documents.	\$ 125.00	\$ 125.00	Jusu Sirleaf
TimeEntry	4/10/25	0.1	Email to AtticusAdmin re potential claims administration.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	4/10/25	0.2	Emails to co-counsel re potential claims administrators (.1 .1).	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	4/14/25	0.3	Call with Brian Sutherland re damages calculations.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	4/14/25	0.1	WhatsApp message to clients re mediation prep meeting.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	4/14/25	0.4	Call with Chris Hall re settlement calculations.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	4/14/25	2	Reviewed Mobis docs in EverLaw, separated some of the docs into binders.	\$ 125.00	\$ 250.00	Jusu Sirleaf

TimeEntry	4/15/25	0.4	Teams meeting with Atticus Admin re claims administration.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	4/15/25	5.3	Substantive edit of demand letter, including related legal and document research and calls with co-counsel.	\$ 750.00	\$ 3,975.00	Daniel Werner
TimeEntry	4/16/25	0.2	WhatsApp message to all plaintiffs re mediation prep meeting.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	4/16/25	4.7	Detailed review/edit of demand letter (.7); calls with Chris re same (.2 .1); emails to co-counsel re same (.1); review Allswell documents to determine [REDACTED], including logging info on spreadsheet (2.8).	\$ 750.00	\$ 3,525.00	Daniel Werner
TimeEntry	4/16/25	0.6	Emails to CDM re settlement administration plan.	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	4/16/25	1.5	Mediation prep call with all plaintiffs (and Abby) (1.2); follow-up WhatsApp messages with Abby (.1).	\$ 750.00	\$ 1,125.00	Daniel Werner
TimeEntry	4/17/25	2.5	Review documents to prepare for mediation; emails to co-counsel re same.	\$ 750.00	\$ 1,875.00	Daniel Werner
TimeEntry	4/17/25	0.3	Email to co-counsel re mediation position.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	4/18/25	0.4	Emails to co-counsel re settlement/mediation calculations and strategy (.2 .1); text messages to Brian and Chris re same (.1)	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	4/20/25	1.6	Rework [REDACTED] for mediation (1.5); email to co-counsel re same (.2).	\$ 750.00	\$ 1,200.00	Daniel Werner
TimeEntry	4/21/25	1	Drive to/from mediation.	\$ 750.00	\$ 750.00	Daniel Werner
TimeEntry	4/21/25	11.8	Attend mediation.	\$ 750.00	\$ 8,850.00	Daniel Werner
TimeEntry	4/22/25	1	Drive to/from mediation	\$ 750.00	\$ 750.00	Daniel Werner
TimeEntry	4/22/25	11.8	Attend mediation.	\$ 750.00	\$ 8,850.00	Daniel Werner
TimeEntry	4/23/25	0.3	Review email term sheet (.1); email to co-counsel re same (.2).	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	4/23/25	0.2	Email to co-counsel re next steps.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	4/24/25	0.9	Emails/calls with co-counsel re settlement.	\$ 750.00	\$ 675.00	Daniel Werner
TimeEntry	4/25/25	1.7	Fees calculations, conversations & emails with co-counsel re settlement.	\$ 750.00	\$ 1,275.00	Daniel Werner
TimeEntry	4/28/25	0.5	Emails to co-counsel re term sheet, including review of documents.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	4/29/25	0.1	Email to co-counsel re Kia settlement timing.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	4/30/25	0.3	WhatsApp update to clients.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	5/1/25	1	Emails with co-counsel re term sheet language.	\$ 750.00	\$ 750.00	Daniel Werner
TimeEntry	5/2/25	0.2	Review emails re settlement; email to co-counsel re term sheet.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	5/6/25	0.1	Email to co-counsel re term sheet language.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	5/7/25	0.4	Zoom with co-counsel re case planning.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	5/7/25	0.5	Review JKL [REDACTED] email to Brian and Julia re same.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	5/8/25	0.2	Reviewing Mobis/Kia settlement update emails.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	5/8/25	0.4	Email to co-counsel re [REDACTED].	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	5/12/25	0.3	Email to co-counsel re term sheet/request for class member information.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	5/13/25	1.2	Draft preliminary approval motion	\$ 750.00	\$ 900.00	Daniel Werner
TimeEntry	5/13/25	0.1	Email to co-counsel re [REDACTED].	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	5/14/25	0.5	Draft preliminary approval motion	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	5/19/25	1.9	Draft/edit settlement documents; emails to co-counsel re same.	\$ 750.00	\$ 1,425.00	Daniel Werner
TimeEntry	5/22/25	1.5	Review/edit settlement documents; emails and calls with co-counsel; re same.	\$ 750.00	\$ 1,125.00	Daniel Werner
TimeEntry	5/23/25	1.4	Review settlement agreement/notice; related emails to co-counsel.	\$ 750.00	\$ 1,050.00	Daniel Werner
TimeEntry	5/29/25	0.5	Meet with Atticus re settlement administration.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	5/30/25	1.4	Create settlement distribution spreadsheet, including related legal research.	\$ 750.00	\$ 1,050.00	Daniel Werner
TimeEntry	5/31/25	0.5	Email to co-counsel re settlement distribution spreadsheet.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	5/31/25	0.2	WhatsApp messages with clients re names of supervisors.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	5/31/25	2.5	Prepare settlement distribution spreadsheet.	\$ 750.00	\$ 1,875.00	Daniel Werner

TimeEntry	6/1/25	1.7	Additional settlement distribution calculations (1.4); email to co-counsel re same (.3).	\$ 750.00	\$ 1,275.00	Daniel Werner
TimeEntry	6/2/25	0.2	Email to Chris re settlement distribution numbers.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	6/4/25	0.8	Rework settlement distribution numbers; email to co-counsel re same.	\$ 750.00	\$ 600.00	Daniel Werner
TimeEntry	6/6/25	0.3	Settlement calculations	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	6/6/25	0.6	WhatsApp communications with clients re names of supervisors.	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	6/9/25	0.1	Email to co-counsel re CAFA notice.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	7/2/25	0.9	Reviewing settlement documents and class lists for Martinez v. MOBIS, and drafting motion and notice for preliminary approval [REDACTED]	\$ 750.00	\$ 675.00	Daniel Werner
TimeEntry	7/3/25	2.3	Class member damages post-settlement distribution calculations.	\$ 750.00	\$ 1,725.00	Daniel Werner
TimeEntry	7/5/25	1.1	Review/edit approval motion and class notice; email to Chris re same.	\$ 750.00	\$ 825.00	Daniel Werner
TimeEntry	7/5/25	0.2	Call with Chris Hall re settlement documents.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	7/14/25	1.1	Review OC edits of Settlement Agreement (.6); email to co-counsel re same (.5).	\$ 750.00	\$ 825.00	Daniel Werner
TimeEntry	7/15/25	0.5	Email correspondence with co-counsel re settlement process/related review of emails and other documents.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	7/20/25	0.1	Email to co-counsel re settlement.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	7/21/25	0.3	Teams meeting with co-counsel re case strategy/next steps.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	7/22/25	0.2	Review long form notice edits (.1); email to co-counsel re same/meeting with OC (.1)	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	7/22/25	0.2	Email to co-counsel re settlement/media.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	7/22/25	0.4	Call with all counsel re settlement.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	7/23/25	0.6	Review draft settlement edits; email to co-counsel re same.	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	7/23/25	0.7	Meeting with Allswell counsel re [REDACTED] (.4); follow-up email and research re same (.3).	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	7/24/25	0.3	Review motion for preliminary approval; email to co-counsel re same.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	8/4/25	0.2	Email to co-counsel re class data.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	8/8/25	0.7	Email to co-counsel re settlement terms, including document review.	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	8/13/25	0.4	Call with co-counsel re settlement.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	8/14/25	0.4	Review draft email to OC; email to co-counsel re same.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	8/14/25	3	Detailed review/comparison of class lists (2.6); start drafting email to co-counsel re same (.4).	\$ 750.00	\$ 2,250.00	Daniel Werner
TimeEntry	8/15/25	2	Class list and calculations	\$ 750.00	\$ 1,500.00	Daniel Werner
TimeEntry	8/20/25	0.2	Zoom meeting with co-counsel re case strategy, settlement, next steps.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	8/20/25	0.5	Call with Chris and Evan re class list reconciliation (.3); follow-up call with Chris re same (.2).	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	8/27/25	0.1	Email to Julia S. re [REDACTED]	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	8/27/25	0.2	Call with Chris re settlement.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	8/28/25	0.3	Message to co-counsel re settlement opt-out period.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	9/3/25	0.1	Zoom meeting with co-counsel re settlement.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	9/13/25	1	Review/consolidate class list (.9); email to Cohen re likely non-class member on list (.1).	\$ 750.00	\$ 750.00	Daniel Werner
TimeEntry	9/14/25	3.3	Review/consolidate class list (3.1); email to Cohen re likely non-class member on list (.2).	\$ 750.00	\$ 2,475.00	Daniel Werner
TimeEntry	9/15/25	1	Finalize settlement calculations (.4); edit settlement agreement (.2) and long form notice (.2) [REDACTED]; email to co-counsel re same (.2)	\$ 750.00	\$ 750.00	Daniel Werner
TimeEntry	9/17/25	0.4	Call with co-counsel re case planning/strategy.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	9/18/25	0.2	Review settlement motion/notice.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	9/19/25	0.1	Reviewing Mobis defendants' changes, redlining Mobis SA amounts, updating Kia-Mobis class list, and coordinating notice revisions via email.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	9/19/25	0.4	Review draft settlement agreement and related documents; email to co-counsel re same.	\$ 750.00	\$ 300.00	Daniel Werner

TimeEntry	9/22/25	0.1	Review settlement documents.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	9/24/25	0.3	Meeting with co-counsel re settlement/next steps.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	10/8/25	0.7	[REDACTED]; call and email with Chris re same.	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	10/21/25	0.3	Teams meeting with co-counsel re finalizing settlement.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	10/29/25	0.4	Teams meeting with co-counsel re settlement.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	11/6/25	1.1	Emails and other settlement-related client communications	\$ 750.00	\$ 825.00	Daniel Werner
TimeEntry	11/7/25	1.4	Settlement-related communications with co-counsel and clients.	\$ 750.00	\$ 1,050.00	Daniel Werner
TimeEntry	11/10/25	0.7	Finalize settlement papers.	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	11/12/25	0.3	Communications with Atticus re settlement admin.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	11/13/25	0.1	Email to Sarah Phaff re Kia signatures on settlement agreement.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	11/20/25	0.2	Email to CDM re [REDACTED]	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	11/20/25	2.5	Finalize/file preliminary approval papers, including correspondence with all counsel; [REDACTED]	\$ 750.00	\$ 1,875.00	Daniel Werner
TimeEntry	11/21/25	0.4	Finalize [REDACTED]	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	11/24/25	0.5	Review CAFA notice; provide related documents to Claims Administrator.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	11/24/25	0.7	Detailed update message to clients; email to co-counsel re same.	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	11/25/25	0.3	Review CAFA notice; emails to co-counsel re same.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	11/26/25	0.2	Email to co-counsel re next steps in case.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	12/5/25	0.4	Emails to coordinate call with chambers re settlement.	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	12/10/25	0.2	Call with co-counsel re case planning/settlement.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	12/16/25	0.6	Status conference re class settlement; follow-up Zoom meeting with all counsel.	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	12/16/25	0.6	Prepare for status conference.	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	12/18/25	2.7	Detailed settlement review.	\$ 750.00	\$ 2,025.00	Daniel Werner
TimeEntry	12/22/25	1	Communications with co-counsel re settlement admin.	\$ 750.00	\$ 750.00	Daniel Werner
TimeEntry	12/23/25	0.8	Communications with co-counsel and Atticus re settlement admin.	\$ 750.00	\$ 600.00	Daniel Werner
TimeEntry	12/29/25	0.5	Emails/calls with co-counsel re settlement administration.	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	1/4/26	0.5	Settlement administration-related document review	\$ 750.00	\$ 375.00	Daniel Werner
TimeEntry	1/5/26	0.4	Settlement administration-related document review	\$ 750.00	\$ 300.00	Daniel Werner
TimeEntry	1/7/26	3.4	Settlement administration-related document review; related communications with co-counsel	\$ 750.00	\$ 2,550.00	Daniel Werner
TimeEntry	1/8/26	0.8	Settlement admin (revising prelim approval motion papers)	\$ 750.00	\$ 600.00	Daniel Werner
TimeEntry	1/22/26	1.1	Various admin, including review/edit of settlement documents	\$ 750.00	\$ 825.00	Daniel Werner
TimeEntry	1/23/26	0.6	Review/edit of settlement documents	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	2/20/26	0.6	Kickoff call with Atticus and CDM.	\$ 750.00	\$ 450.00	Daniel Werner
TimeEntry	2/23/26	1.3	Review class distribution list and apply formulas to determine missing information (.5); draft/edit email to OC re same (.6); email to co-counsel re same (.2).	\$ 750.00	\$ 975.00	Daniel Werner
TimeEntry	2/25/26	0.3	Zoom with co-counsel re settlement admin logistics.	\$ 750.00	\$ 225.00	Daniel Werner
TimeEntry	2/26/26	0.1	Message to Even re Mexico class member addresses.	\$ 750.00	\$ 75.00	Daniel Werner
TimeEntry	2/27/26	0.7	Communications with OC re class member contact information.	\$ 750.00	\$ 525.00	Daniel Werner
TimeEntry	3/2/26	0.2	Email to co-counsel re notice distribution.	\$ 750.00	\$ 150.00	Daniel Werner
TimeEntry	3/16/26	0.3	Correspondence with DW and JES re settlement distribution and review materials provided by DW.	\$ 125.00	\$ 37.50	Isabella Valadez
TimeEntry	3/16/26	0.5	Mobis/Alabama [REDACTED] Phone call with client regarding [REDACTED]	\$ 125.00	\$ 62.50	Jusu Sirleaf
TimeEntry	3/16/26	0.3	Settlement admin: communications with co-counsel re notice distribution.	\$ 750.00	\$ 225.00	Daniel Werner

<b>TimeEntry</b>	3/17/26	0.1	Correspondence with Paralegals/IW/RI re correspondences from Kia-Mobis class members.	\$ 125.00	\$ 12.50	Isabella Valadez
<b>TimeEntry</b>	3/18/26	0.2	Settlement admin: communications with co-counsel re class settlement documents.	\$ 750.00	\$ 150.00	Daniel Werner
<b>TimeEntry</b>	3/18/26	0.5	Settlement admin: Zoom with co-counsel re Mobis notice/settlement admin issues (.1); email to co-counsel re exclusions (.1).	\$ 750.00	\$ 375.00	Daniel Werner
<b>TimeEntry</b>	3/19/26	0.4	Correspondences with class members who contacted our office directly re settlement distribution.	\$ 125.00	\$ 50.00	Isabella Valadez
<b>TimeEntry</b>	3/19/26	0.1	Call with client regarding [REDACTED].	\$ 125.00	\$ 12.50	Isabella Valadez
<b>TimeEntry</b>	3/19/26	0.2	Call with client regarding [REDACTED].	\$ 125.00	\$ 25.00	Isabella Valadez
<b>TimeEntry</b>	3/19/26	0.3	Settlement admin: review class member contact notes to respond to communications from class member.	\$ 750.00	\$ 225.00	Daniel Werner
<b>TimeEntry</b>	3/24/26	0.1	Settlement admin (Mobis): email to CDM forwarding class member query.	\$ 750.00	\$ 75.00	Daniel Werner
<b>TimeEntry</b>	3/25/26	0.6	Settlement admin (Mobis): Zoom with CDM re notice distribution issues (.5); related email re class member (.1).	\$ 750.00	\$ 450.00	Daniel Werner
<b>TimeEntry</b>	4/6/26	0.4	Settlement admin: email to CDM re class member questions.	\$ 750.00	\$ 300.00	Daniel Werner
<b>TimeEntry</b>	4/9/26	0.1	Call with class member.	\$ 125.00	\$ 12.50	Isabella Valadez
<b>TimeEntry</b>	4/13/26	0.2	Settlement admin - Mobis -- email to CDM re fees petition.	\$ 750.00	\$ 150.00	Daniel Werner
<b>TimeEntry</b>	4/15/26	0.3	Settlement admin: Mobis - meeting with co-counsel re settlement admin, fees petition, final approval motion.	\$ 750.00	\$ 225.00	Daniel Werner

Cost Records - Radford Scott LLP - Aquino Martinez v. Mobis Alabama, LLC

Type	Date	Hours	Description	Billable (\$)
ExpenseEntry	02/02/2023	1	Kristin Greer Love pro hac vice admission fee	\$ 150.00
ExpenseEntry	02/02/2023	1	Efiling fee	\$ 150.00
ExpenseEntry	04/04/2025	1	Everlaw service fee	\$ 17.00
ExpenseEntry	04/30/2025	1	Everlaw service fee	\$ 17.00
ExpenseEntry	05/31/2025	1	Everlaw service fee	\$ 3.00
ExpenseEntry	06/30/2025	1	Everlaw service fee	\$ 3.00
ExpenseEntry	07/30/2025	1	Everlaw service fee	\$ 3.00
ExpenseEntry	08/31/2025	1	Everlaw service fee	\$ 3.00
ExpenseEntry	09/30/2025	1	Everlaw service fee	\$ 3.00
ExpenseEntry	10/30/2025	1	Everlaw service fee	\$ 3.00
ExpenseEntry	11/30/2025	1	Everlaw service fee	\$ 3.00
ExpenseEntry	12/31/2025	1	Everlaw service fee	\$ 3.00