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15	1650 IDS Center, 80 South Eighth Street Minneapolis, Minnesota 55402	
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17	Counsel for Plaintiffs Stevie Hemphill and Linda Gomez and the Class	
18		
19		E STATE OF CALIFORNIA LOS ANGELES
20	RON ALD CHI N IIZ, STEVIE HEMPH LL,) CA SE N Q: 18STCV08068
21	and LIN DAGOMEZ, individually and on behalf of all others similarly situated,	DECLARATION OF SUSAN M.
22	Plaintiffs,	COLER IN SUPPORT OF MOTION FOR FEES AND COSTS
23	V.) Judge: Honorable Lawrence P. Riff
24	TELECO M EVOLUTIO NS, LLC, a California limited liability company, and) Complaint filed: December 12, 2018
25	QUALITY SPEA KS LLC, a California limited liability company,)
26	Defendants.	
27))
28		

DECLARATION OF SUSAN M. COLER IN SUPPORT OF MOTION FOR FEES AND COSTS

I, Susan M. Coler, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

- 1. I am an attorney and partner at Halunen Law, counsel for Plaintiffs and the Class in this action. My principal office at Halunen Law is located at 80 South Eighth Street, Suite 1650, Minneapolis, Minnesota 55402. I have an application pending for *pro hac vice* admission to this Court.
- 2. I have litigated class actions at Halunen Law and prior law firms where I worked. I am a member of the firm's management team and am familiar with the methods for timekeeping and tracking of expenses at Halunen Law. To prepare this Declaration, I have reviewed the time records for the Halunen Law attorneys who worked on the above-captioned cases and the expenses paid by Halunen Law. Based on this review I offer the information and opinions below.
- 3. At Halunen Law, the attorneys record their time in a software program called PerfectLaw that includes for each entry, among other things, the case name, attorney, date, time spent, and description of how the time was spent.
- 4. I have reviewed the record of the time spent on this case by two then-Halunen Law attorneys, Charles D. Moore and Christopher J. Moreland as recorded in Perfect Law. In the course of that review, I deleted entries of a clerical nature, and *de minimis* entries from an investigator and myself. I deemed the remaining entries non-duplicative and reasonable. A spreadsheet of the remaining time entries is attached to this Declaration as Exhibit A.
- 5. Listed below in Table 1 is the time Halunen Law has expended to date in this matter. The table is based on information in Exhibit A.
- 6. Halunen Law's class action practice is national in scope. Accordingly, its hourly rates are based on and within the range of current rates¹ charged by attorneys of equivalent experience and skill as attorneys Moreland and Moore who practice at firms involved in similar class actions in the California marketplace. *See, e.g., Marshall v. Webster*, 54 Cal. App. 5th 275, 285 (2020) (finding the

¹ It is common in fee-shifting cases that a fee award is based on current rather than historical rates. *See*, e.g., *Jenkins v. Missouri*, 491 U.S. 274, 282-83 (1989) (fees awarded pursuant to a fee-shifting statute "should account for delay in payment").

7. As shown in Table 1, Halunen Law attorneys spent 439.2 hours litigating this class action and its lodestar, based on equivalent current hourly rates for the California class action marketplace, which are usual and customary in cases of this type, totals \$404,880.00.

TABLE 1

Name and Bar Admission Year	Title	Hours	Rate/Hour	Lodestar
Christopher J. Moreland (1997)	Partner	32	\$1,200.00	\$ 38,400.00
Charles D. Moore (2014)	Senior Associate	407.20	\$ 900.00	\$ 366.480.00
	Total:	439.20	Total:	\$ 404,880.00

8. Table 2 below provides a summary of costs incurred by Halunen Law in litigating this case. These costs are reasonable and common in cases of this type. An itemization of these costs is provided at Exhibit 2 to this Declaration.

TABLE 2

Item	Amount
Claims Administrator Case Set-Up	\$ 1,300.00
Copies	\$ 273.40
Filing Fees	\$ 739.80
Mediation Fees	\$ 5,577.00
Postage	\$ 29.03
Pro Hac Vice Fees	\$ 2,000.00
Travel	\$ 2,836.43

TOTAL COSTS 9. Attached to this Declaration are true and correct copies of the following documents: Exhibit 1: Halunen Law Time Itemization Exhibit 2: Halunen Law Costs Itemization I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 7th day of December, 2022, in Ramsey County, St. Paul, Minnesota.

\$12,755.66

Atty	Date	Hours	Description
CDM	8/22/2017	2.80	Drafting Complaint
CDM	8/23/2017	5.60	Drafting Complaint
CDM	8/24/2017	6.00	Drafting Complaint
CDM	8/24/2017	6.00	Drafting Complaint
CDM	8/25/2017	3.60	Drafting Complaint
CDM	8/28/2017	1.20	Drafting Complaint
CDM	8/29/2017	3.70	Drafting Complaint
CDM	10/24/2017	0.20	Emailing client for authorization to file complaint
CDM	10/30/2017	0.20	Editing Complaint
CDM	11/20/2017	0.10	Drafting Notice Letter
CDM	12/12/2017	0.60	Drafting Tolling Agreement
CDM	4/10/2018	1.20	drafting follow-up response to defense counsel
CDM	4/11/2018	0.50	Call with client
CDM	4/12/2018	0.10	Reviewing email from client
CDM	4/13/2018	0.10	Reviewing email from defense counsel
CDM	5/1/2018	0.40	Drafting email to defense counsel regarding document requests
CDM	5/2/2018	0.30	Drafting email to defense counsel regarding document requests
CDM	5/7/2018	0.80	Drafting response email to defense counsel
CDM	5/10/2018	0.40	Drafting email to defense counsel
CDM	5/10/2018	0.30	Call with defense counsel
CDM	5/11/2018	0.80	Call with client
CDM	5/11/2018	1.10	Drafting settlement demand
CDM	5/12/2018	0.50	Call with client
CDM	5/14/2018	0.40	Reviewing emails from client
CDM	5/14/2018	3.50	Drafting settlement demand
CDM	5/15/2018	0.80	Call with client
CDM	5/15/2018	0.10	Call with client
CDM	5/16/2018	0.40	Call with client about upgrading services
CDM	5/18/2018	0.30	Call with client
CDM	5/22/2018	1.10	updating complaint for filing
CDM	5/23/2018	1.00	Reviewing letter from defense counsel
CDM	5/23/2018	1.10	Researching law on damages models
CDM	5/24/2018	0.80	Preparing for call with defense counsel
CDM	5/24/2018	0.70	Call with Defense counsel
CDM	5/30/2018	6.20	Drafting settlement demand
CDM	6/12/2018	0.40	Reviewing defendant's response to individual settlement demand
CDM	6/19/2018	1.30	Call with client
CDM	6/19/2018	1.10	Drafting email to defense counsel

Atty	Date	Hours	Description
CDM	8/7/2018	1.70	Call with co-counsel
CDM	8/8/2018	0.20	Reviewing Settlement Demand letter
CDM	9/27/2018	1.80	Editing complaint
CDM	12/4/2018	0.60	Call with co-counsel to discuss finalizing complaint
CDM	12/6/2018	0.20	Gathering complaint exhibits
CDM	2/7/2019	1.60	Researching response to demurrer for meet and confer
CDM	3/8/2019	0.90	Researching California opposition to demurrer limits and timing
CDM	3/12/2019	3.10	Reviewing demurrer
CDM	3/18/2019	1.10	Editing Opp to MtD - injury section
CDM	3/18/2019	2.10	Opp to MtD - drafting actionable statement section
CDM	3/19/2019	0.90	Opp to MtD - drafting actionable statement section
CDM	3/19/2019	3.60	Opp to MtD - drafting reliance section
CDM	3/22/2019	3.10	Opp to MtD - drafting reliance section
CDM	3/25/2019	3.70	Opp to MtD - editing Halunen section
CDM	3/26/2019	4.60	Opp to MtD - editing Halunen section
CDM	3/27/2019	4.60	Opp to MtD - editing Halunen section
CDM	4/1/2019	1.60	Editing Opp to MtD
CDM	4/2/2019	2.80	Editing Opp to MtD
CDM	4/15/2019	1.10	Reviewing Reply to Opp to MtD
CDM	4/23/2019	0.50	Call with co-counsel re: case strategy
CDM	4/24/2019	2.50	Drafting Discovery Requests
CDM	4/25/2019	2.70	Drafting Discovery Requests
CDM	4/26/2019	4.40	Drafting Discovery Requests
CDM	4/29/2019	1.80	Researching deposition rules
CDM	4/30/2019	0.20	Researching deposition rules
CDM	5/1/2019	0.50	Researching objection to deposition notice
CDM	5/3/2019	2.60	Drafting deposition notice and subpoena for James Murphy
CDM	5/3/2019	0.50	Drafting objection deposition notice of Ron Chinitz
CDM	5/6/2019	2.40	Drafting objection deposition notice of Ron Chinitz
CDM	6/4/2019	0.30	Emailing co-counsel re: experts
CDM	6/5/2019	0.60	Checking discovery deadlines and emailing co-counsel re: experts
CDM	6/7/2019	2.70	Reviewing AT&T subpoena and PMK depo notice
CDM	6/26/2019	0.20	Reviewing stipulation to stay
CDM	8/15/2019	0.60	Reviewing discovery requests from Def.
CDM	8/21/2019	1.10	Meet and confer
CDM	8/29/2019	1.20	Researching California class cert cases for mediation statement
CDM	9/4/2019	2.80	Researching California class cert cases for mediation statement
CDM	9/5/2019	6.20	drafting mediation statement

Atty	Date	Hours	Description
CDM	9/6/2019	5.10	drafting mediation statement
CDM	9/9/2019	2.00	drafting mediation statement
CDM	9/13/2019	2.10	Reviewing production
CDM	10/2/2019	1.40	Drafting stipulation to stay
CDM	10/9/2019	0.20	Emails re: mediation invoice
CDM	11/15/2019	2.20	Drafting supplemental mediation statement
CDM	11/18/2019	0.40	Finalizing Supp. Med. Statement
CDM	11/24/2019	7.10	Travel to second mediation session
CDM	11/25/2019	6.50	Second mediation session
CDM	11/26/2019	6.30	Travel from second mediation session
CDM	11/27/2019	3.30	Preparing motion to enforce MOA
CDM	12/2/2019	5.10	Preparing motion to enforce MOA
CDM	12/3/2019	6.60	Preparing motion to enforce MOA
CDM	12/4/2019	5.30	Preparing motion to enforce MOA
CDM	12/5/2019	3.10	Preparing motion to enforce MOA
CDM	12/5/2019	0.60	Editing CMS
CDM	12/6/2019	1.80	Preparing motion to enforce MOA
CDM	12/9/2019	3.30	Editing motion for sanctions
CDM	12/9/2019	0.30	Email to co-counsel re: motion to enforce
CDM	12/19/2019	0.40	Email to co-counsel re: discovery
CDM	12/19/2019	4.60	Reviewing deposition notice and requests for production, and drafting objections
CDM	12/19/2019	1.70	Drafting depo notices
CDM	12/20/2019	1.90	Reviewing previous discovery responses and preparing response to most recent RFPs and ROGs
CDM	12/20/2019	3.70	Drafting deficiency letter re: responses to RFDs
CDM	1/2/2020	0.30	Emails re: motion to enforce
CDM	1/2/2020	1.90	Drafting deficiency letter
CDM	1/3/2020	2.80	Drafting new discovery requests
CDM	1/3/2020	0.80	Call with Andrea Q5
CDM	1/7/2020	3.40	Drafting objections to discovery
CDM	1/8/2020	0.90	Drafting objections to discovery
CDM	1/9/2020	1.90	Drafting objections to discovery
CDM	1/10/2020	5.30	Drafting objections to discovery
CDM	1/12/2020	1.10	Editing Discovery Responses
CDM	1/13/2020	1.70	Finalizing motion to enforce
CDM	1/13/2020	0.50	Editing Deficiency letter
CDM	1/13/2020	0.10	Call w/ co-counsel re: ROG responses
CDM	1/13/2020	0.80	drafting new written discovery

Atty	Date	Hours	Description
CDM	1/13/2020	1.10	Editing Discovery Responses
CDM	1/14/2020	0.60	Editing Discovery Responses
CDM	1/21/2020	1.50	Drafting responses to RFPs
CDM	1/28/2020	0.30	Call co-counsel re: deficiency letter
CDM	1/28/2020	0.90	preparing letter for service
CDM	1/29/2020	0.60	Drafting Special ROGS set two
CDM	1/30/2020	1.20	Drafting Special ROGS set two
CDM	2/5/2020	0.10	Email to co-counsel re: additional discovery requests
CDM	2/5/2020	1.40	Researching discovery timing rules
CDM	2/6/2020	0.70	Call w/ co-counsel re: call w/ defense re discovery deficiencies
CDM	2/6/2020	0.60	Call w/ defense re discovery deficiencies
CDM	2/6/2020	0.20	Finalizing ROGs set two
CDM	2/7/2020	2.00	Finalizing ROGs set two
CDM	2/21/2020	0.30	Drafting final meet and confer
CDM	2/24/2020	3.60	Reviewing Def. Deficiency letter and drafting response
CDM	2/25/2020	3.40	Reviewing Def. Deficiency letter and drafting response
CDM	2/25/2020	0.90	Reviewing motion for sanctions
CDM	2/25/2020	1.60	Revising Answers to Def. ROGs set two
CDM	2/26/2020	4.90	Revising Answers to Def. ROGs set two
CDM	2/26/2020	0.20	Email to defense counsel re: discovery deadline
CDM	2/27/2020	0.20	Email to co-counsel re: discovery deadlines and productions
CDM	2/27/2020	1.60	Preparing Request for an informal discovery conference
CDM	2/28/2020	0.20	Sending request for informal discovery conference
CDM	3/4/2020	1.00	Call w/ co-counsel re: discovery disputes
CDM	3/5/2020	0.40	Call w/ defense counsel re: depositions
CDM	3/9/2020	0.90	Reviewing Second Set of ROGs to Def. and deadlines; drafting deficiency letter
CDM	3/10/2020	0.80	Drafting Notice of Withdrawal of Motion
CDM	3/11/2020	5.80	Reviewing letter and preparing responses for IDC
CDM	3/11/2020	0.60	Call w/ cocunsel re: IDC
CDM	3/11/2020	0.60	Informal discovery conference with court
CDM	3/12/2020	4.80	Drafting response letter to defense re: March 11 letter
CDM	3/12/2020	0.30	Emails w/ co-counsel re: IDC and deficiency letter
CDM	3/13/2020	0.60	Review def. responses to discovery requests
CDM	3/13/2020	0.20	Email Def. re: def. responses to discovery requests
CDM	3/17/2020	0.30	Emails w/ Def. re: def. responses to discovery requests
CDM	3/17/2020	0.30	Request second IDC with court via message board
CDM	3/18/2020	0.50	Review response from court re: request second IDC with court via message board

Atty	Date	Hours	Description
CDM	3/18/2020	0.60	Review and incorporate edits to deficiency letter
CDM	3/19/2020	0.40	Emails w/ Def. re: def. responses to discovery requests
CDM	3/20/2020	0.20	Review and incorporate edits to deficiency letter
CDM	3/20/2020	0.50	Call w/ Def. re: deficiencies in discovery responses
CDM	3/20/2020	0.20	review def. letter re: deficiencies in discovery responses
CDM	3/23/2020	0.30	finalize deficiency letter
CDM	3/23/2020	0.20	Emails w/ co-counsel. re: def. responses to discovery requests
CDM	3/24/2020	0.50	Emails w/ Def. re: def. responses to discovery requests
CDM	3/25/2020	0.30	Emails w/ co-counsel re: settlement email from def.
CDM	3/26/2020	0.10	Emails w/ co-counsel re: settlement email from def.
CDM	3/27/2020	0.40	Emails w/ Def. re: def. responses to discovery requests
CDM	3/31/2020	0.20	Emails w/ Def. re: def. responses to discovery requests
CDM	3/31/2020	0.20	Emails w/ co-counsel re: settlement email from def.
CDM	3/31/2020	0.20	Emails w/ co-counsel re: settlement email from def.
CDM	4/1/2020	0.20	Emails w/ co-counsel re: settlement email from def.
CDM	4/1/2020	0.40	Emails w/ Def. re: def. responses to discovery requests
CDM	4/1/2020	1.10	draft response letter. re: def. responses to discovery requests
CDM	4/2/2020	0.20	Emails w/ Def. re: def. responses to discovery requests
CDM	4/2/2020	0.20	Emails w/ co-counsel re: settlement email from def.
CDM	4/3/2020	0.10	Emails w/ co-counsel re: settlement email from def.
CDM	4/7/2020	0.20	Emails w/ co-counsel. re: def. responses to discovery requests
CDM	4/10/2020	0.10	Emails w/ co-counsel re: settlement email from def.
CDM	4/14/2020	0.20	Emails w/ Def. re: def. responses to discovery requests
CDM	4/15/2020	0.60	Initial review of supplemental production
CDM	4/15/2020	0.10	Emails w/ co-counsel re: settlement email from def.
CDM	4/16/2020	0.40	Emails w/ co-counsel re: settlement email from def.
CDM	4/16/2020	0.20	Emails w/ Def. re: def. responses to discovery requests
CDM	4/16/2020	0.20	Review message from court
CDM	4/17/2020	0.10	Emails w/ co-counsel re: settlement email from def.
CDM	4/20/2020	0.20	Review message from court
CDM	4/20/2020	0.40	Emails w/ co-counsel re: PHVs
CDM	4/21/2020	0.20	Emails w/ co-counsel re: PHVs
CDM	4/21/2020	0.30	Emails w/ co-counsel re: settlement email from def.
CDM	4/21/2020	0.30	Emails w/ Def. re: def. responses to discovery requests
CDM	4/22/2020	0.10	Emails w/ co-counsel re: PHVs
CDM	4/29/2020	0.20	Emails w/ co-counsel re: settlement email from def.
CDM	4/30/2020	0.60	Emails w/ co-counsel re: settlement email from def.
CDM	5/1/2020	0.70	Emails w/ Def. re: def. response letter to discovery requests

Atty	Date	Hours	Description
CDM	5/4/2020	0.50	Emails w/ potential admins re: Belaire West notice
CDM	5/4/2020	0.80	Emails w/ co-counsel re: Belaire West notice
CDM	5/5/2020	0.70	Call w/ Def. re: def. response letter to discovery requests
CDM	5/15/2020	0.10	Email w/ co-counsel re: edits to email message to court re: PHVs and order to show cause
CDM	5/18/2020	0.20	Emails w/ co-counsel re: subpoenas to AT&T
CDM	5/19/2020	1.60	Draft new set of discovery requests
CDM	5/20/2020	0.30	Email w/ co-counsel re: new set of discovery requests
CDM	5/26/2020	0.30	Emails w/ co-counsel re: Belaire West notice
CDM	5/26/2020	0.20	Emails w/ potential admins re: Belaire West notice
CDM	5/26/2020	0.30	Email w/ co-counsel re: new set of discovery requests
CDM	5/26/2020	0.80	Call w/ potential admins re: Belaire West notice
CDM	5/27/2020	0.20	Emails w/ potential admins re: Belaire West notice
CDM	5/27/2020	0.30	Emails w/ co-counsel re: Belaire West notice
CDM	6/3/2020	1.20	Finalize and serve new set of discovery requests
CDM	6/4/2020	0.10	Emails w/ potential admins re: Belaire West notice
CDM	6/5/2020	0.10	Emails w/ potential admins re: Belaire West notice
CDM	6/8/2020	0.10	Emails w/ potential admins re: Belaire West notice
CDM	6/9/2020	0.10	Emails w/ potential admins re: Belaire West notice
CDM	6/9/2020	0.20	Emails w/ co-counsel re: Belaire West notice
CDM	6/29/2020	1.80	Draft Joint Status Report
CDM	6/29/2020	0.60	email w/ co-counsel re: Joint Status Report
CDM	6/30/2020	0.40	review def. edits to Joint Status Report
CDM	6/30/2020	0.60	finalizing and filing Joint Status Report
CDM	7/2/2020	0.10	email w/ co-counsel re: Joint Status Conference / IDC
CDM	7/7/2020	1.00	Joint Status Conference / IDC w/ court
CDM	7/7/2020	1.20	Reviewing responses to new discovery requests
CDM	7/7/2020	0.20	Email w/ co-counsel re: Joint Status Conference / IDC w/ court
CDM	7/10/2020	1.70	Draft and file notice of ruling in Joint Status Conference / IDC w/ court
CDM	7/13/2020	0.20	Review def. obj. to notice of ruling in Joint Status Conference / IDC w/ court
CDM	7/14/2020	0.20	Email def. re: notice of ruling in Joint Status Conference / IDC w/ court
CDM	7/14/2020	0.70	Call w/ potential admins re: Belaire West notice
CDM	7/14/2020	0.30	Email w/ co-counsel re: Belaire West notice
CDM	7/14/2020	0.40	Email w/ potential admins re: Belaire West notice
CDM	7/14/2020	0.20	Email w/ def. re: Belaire West notice
CDM	7/15/2020	1.50	Draft and serve revised requests for admission w/ decl.
CDM	7/17/2020	0.10	Email def. re: responses to dis. requests

Atty	Date	Hours	Description
CDM	7/20/2020	0.10	Email w/ def. re: Belaire West notice
CDM	7/20/2020	0.10	Email def. re: responses to dis. requests
CDM	7/21/2020	0.10	Email w/ def. re: Belaire West notice
CDM	7/22/2020	0.10	Email def. re: responses to dis. requests
CDM	7/28/2020	0.80	Review def. supplemental ROG responses
CDM	7/28/2020	1.10	Call w/ co-counsel re: strategy
CDM	7/28/2020	0.10	Email w/ co-counsel re: strategy
CDM	7/28/2020	0.10	Email w/ co-counsel re: strategy
CDM	7/30/2020	0.10	Email def. re: responses to dis. requests
CDM	7/30/2020	0.20	Email co-counsel re: motion to compel discovery
CDM	8/4/2020	0.20	Email w/ co-counsel re: strategy
CDM	8/5/2020	0.30	Email w/ def. re: Belaire West notice
CDM	8/5/2020	0.70	Call w/ co-counsel re: strategy
CDM	8/5/2020	0.30	Email w/ co-counsel re: strategy
CDM	8/5/2020	0.20	Email w/ co-counsel and expert re: damages
CDM	8/13/2020	0.10	Email w/ co-counsel re: strategy
CDM	8/14/2020	0.60	Email w/ def. re: Belaire West notice
CDM	8/18/2020	0.10	Email w/ def. re: RFA responses
CDM	8/18/2020	0.20	Email w/ def. re: Belaire West notice
CDM	8/20/2020	0.40	Review def. RFA responses
CDM	8/21/2020	0.10	Email def. re: responses to dis. requests
CDM	8/28/2020	0.10	Email w/ co-counsel and expert re: damages
CDM	8/28/2020	0.70	Drafting request for extension
CDM	8/30/2020	0.20	email w/ co-counsel re: request for extension
CDM	8/31/2020	0.20	Email w/ co-counsel and expert re: damages
CDM	9/1/2020	0.20	Email w/ co-counsel and expert re: damages
CDM	9/1/2020	0.70	Call w/ expert re: damages
CDM	9/1/2020	0.10	email w/ co-counsel re: request for extension
CDM	9/2/2020	0.20	email w/ co-counsel and def re: request for extension
CDM	9/3/2020	0.20	Email w/ co-counsel re: expert on damages
CDM	9/4/2020	0.30	Emails w/ co-counsel re: removal of fiber optic claim from website
CDM	9/8/2020	0.10	email w/ co-counsel and def re: request for extension
CDM	9/8/2020	0.40	Email w/ def. and admin re: Belaire West notice
CDM	9/8/2020	0.10	Email w/ admin re: Belaire West notice
CDM	9/10/2020	0.40	Email w/ def. and admin re: Belaire West notice
CDM	9/10/2020	0.10	Email w/ def. re: Ron's depo
CDM	9/11/2020	0.30	Email w/ co-counsel re: Ron's depo
CDM	9/11/2020	0.50	Email w/ co-counsel re: potential settlement

Atty	Date	Hours	Description
CDM	9/13/2020	0.10	Email w/ co-counsel re: Ron's depo
CDM	9/13/2020	0.10	Email w/ co-counsel re: potential settlement
CDM	9/14/2020	0.40	Email w/ def. and admin re: Belaire West notice
CDM	9/15/2020	0.20	Email w/ def. and admin re: Belaire West notice
CDM	9/15/2020	0.40	Email w/ co-counsel re: potential settlement
CDM	9/16/2020	0.30	Email w/ co-counsel re: potential settlement
CDM	9/16/2020	0.10	Email w/ def. and admin re: Belaire West notice
CDM	9/16/2020	0.20	Email w/ def. and admin re: Belaire West notice
CDM	9/17/2020	0.20	Email w/ co-counsel re: potential settlement
CDM	9/18/2020	0.10	Email w/ co-counsel re: potential settlement
CDM	9/21/2020	0.30	Email w/ def. and admin re: Belaire West notice
CDM	9/21/2020	0.20	Email w/ co-counsel re: potential settlement
CDM	9/25/2020	0.20	Call w/ recipient of Belaire West notice from Illinois
CDM	9/28/2020	0.60	Email w/ co-counsel re: potential settlement
CDM	9/30/2020	0.30	Email w/ co-counsel re: Belaire West notice
CDM	10/1/2020	0.20	Email w/ def. and admin re: Belaire West notice
CDM	10/9/2020	0.10	Email w/ def re: potential settlement
CDM	10/9/2020	0.30	Email w/ co-counsel re: potential settlement
CDM	10/12/2020	0.10	Email w/ def re: potential settlement
CDM	10/12/2020	0.30	Email w/ co-counsel re: potential settlement
CDM	10/14/2020	0.20	Email w/ co-counsel re: request for extension
CDM	10/15/2020	0.20	Email w/ def re: request for extension
CDM	10/16/2020	0.20	Email w/ def re: request for extension
CDM	10/19/2020	0.20	Email w/ co-counsel re: potential settlement
CDM	10/20/2020	0.70	Email w/ def re: potential settlement
CDM	10/21/2020	0.30	Email w/ def re: potential settlement
CDM	10/22/2020	0.60	Email w/ def re: potential settlement
CDM	10/23/2020	0.20	Email w/ def re: potential settlement
CDM	10/23/2020	0.10	Email w/ def. and admin re: Belaire West notice
CDM	10/27/2020	0.40	Email w/ def re: potential settlement
CDM	10/29/2020	0.20	Email w/ def re: potential settlement
CDM	11/2/2020	0.20	Email w/ def re: potential settlement
CDM	11/12/2020	0.20	Email w/ def re: potential settlement
CDM	11/17/2020	0.30	Email w/ def re: potential settlement
CDM	11/18/2020	0.20	Email w/ def re: potential settlement
CDM	11/19/2020	0.10	Email w/ def re: potential settlement
CDM	11/23/2020	0.40	Email w/ def re: potential settlement
CDM	11/24/2020	0.10	Email w/ def re: potential settlement

Atty	Date	Hours	Description
CDM	12/8/2020	0.10	Email w/ def re: potential settlement
CDM	12/10/2020	0.10	Email w/ def re: potential settlement
CDM	12/12/2020	0.10	Email w/ def re: potential settlement
CDM	12/14/2020	0.40	Email w/ def re: potential settlement
CDM	12/16/2020	0.10	Email w/ def re: potential settlement
CDM	12/16/2020	0.30	Email w/ co-counsel re: potential settlement
CDM	12/21/2020	0.10	Email w/ co-counsel re: request for extension
CDM	12/22/2020	0.20	Email w/ co-counsel re: request for extension
CDM	12/23/2020	0.20	Email w/ co-counsel re: request for extension
CDM	12/29/2020	0.30	Email w/ def re: request for extension
CDM	1/4/2021	0.10	Email w/ def re: potential settlement
CDM	1/5/2021	0.20	Email w/ def re: potential settlement
CDM	1/8/2021	0.70	Email w/ def re: potential settlement
CDM	1/15/2021	0.80	Email w/ def re: potential settlement
CDM	1/22/2021	0.30	Email w/ def re: potential settlement
CDM	1/26/2021	0.40	Email w/ co-counsel re: potential settlement
CDM	1/26/2021	0.10	Email w/ def re: potential settlement
CDM	1/28/2021	0.50	Email w/ def re: potential settlement
CDM	2/2/2021	0.20	Email w/ def re: potential settlement
CDM	2/3/2021	1.20	Email w/ co-counsel re: potential settlement
CDM	2/3/2021	0.30	Email w/ def re: potential settlement
CDM	2/4/2021	0.10	Email w/ def re: potential settlement
CDM	2/5/2021	0.30	Email w/ def re: potential settlement
CDM	2/8/2021	0.50	Email w/ def re: potential settlement
CDM	2/16/2021	4.10	Drafting Amended Complaint
CDM	2/17/2021	0.10	Email co-counsel re: Amended Complaint
CDM	2/17/2021	0.10	Email def re: Amended Complaint
CDM	2/19/2021	0.10	Email def re: Amended Complaint and settlement agreement
CDM	2/22/2021	0.10	Email def re: Amended Complaint and settlement agreement
CDM	2/23/2021	0.30	Email def re: Amended Complaint and settlement agreement
CDM	2/24/2021	0.50	Email def re: Amended Complaint and settlement agreement
CDM	2/26/2021	3.70	Editing settlement agreement
CDM	2/26/2021	0.10	Email co-counsel re: edits to settlement agreement
CDM	3/1/2021	0.10	Email co-counsel re: edits to settlement agreement
CDM	3/2/2021	0.10	Email def re: edits to settlement agreement
CDM	3/8/2021	0.10	Email def re: edits to settlement agreement
CDM	3/11/2021	0.10	Email def re: edits to settlement agreement
CDM	3/16/2021	0.10	Email def re: edits to settlement agreement

Atty	Date	Hours	Description	
CDM	3/18/2021	2.10	Email def re: Ron and Murphy negotiations	
CDM	3/19/2021	0.80	Email def re: Ron and Murphy negotiations	
CDM	3/19/2021	1.90	Email w/ co-counsel re: Ron and Murphy negotiations	
CDM	3/23/2021	0.40	Email w/ re: Belaire production	
CDM	3/23/2021	1.30	Email def re: Ron and Murphy negotiations	
CDM	3/24/2021	2.60	Email w/ co-counsel re: Ron and Murphy negotiations	
CDM	3/24/2021	1.80	Calls to potential TCA leads	
CDM	3/25/2021	1.90	Email w/ co-counsel re: Ron and Murphy negotiations	
CDM	3/26/2021	1.20	Calls to potential TCA leads	
CDM	3/26/2021	1.10	Call w/ co-counsel re: Ron and Murphy negotiations	
CDM	3/26/2021	1.90	Emails w/ co-counsel re: Ron and Murphy negotiations	
CDM	3/26/2021	0.20	Review court order	
CDM	3/29/2021	0.40	Calls to potential TCA leads	
CDM	3/29/2021	0.80	Emails w/ co-counsel re: Ron and Murphy negotiations	
CDM	3/30/2021	0.70	Calls to potential TCA leads	
CDM	3/30/2021	0.40	Emails w/ co-counsel re: Ron and Murphy negotiations	
CDM	3/31/2021	0.40	Calls to potential TCA leads	
CDM	3/31/2021	1.30	Review Def. Motion for Preliminary Approval	
CDM	4/1/2021	1.50	Emails w/ co-counsel re: Ron and Murphy negotiations	
CDM	4/2/2021	0.70	Emails w/ co-counsel re: Ron and Murphy negotiations	
CDM	4/2/2021	0.30	Emails w/ def. re: Def. Motion for Preliminary Approval	
CDM	4/6/2021	0.30	Emails w/ co-counsel. re: termination of representation	
CDM	4/6/2021	0.90	Drafting notice of termination of representation	
CDM	4/6/2021	5.20	Drafting motion for attorney fees	
CDM	4/7/2021	0.70	Emails w/ co-counsel. re: termination of representation	
CDM	4/7/2021	2.70	Editing Draft Federal Complaint for Notice	
CDM	4/8/2021	0.30	Emails w/ co-counsel. re: potential settlment	
CDM	4/8/2021	2.70	Drafting motion for attorney fees	
CDM	4/8/2021	0.30	Reviewing court order	
CDM	4/8/2021	0.30	Emails w/ co-counsel re: court order	
CDM	4/8/2021	0.10	Emails w/ client re: termination of representation	
CDM	4/9/2021	0.40	Emails w/ co-counsel re: court order	
CDM	4/12/2021	0.10	Emails w/ client re: termination of representation	
CDM	4/13/2021	0.10	Emails w/ client re: termination of representation	
CDM	4/15/2021	0.80	Emails w/ co-counsel re: court order and motions	
CDM	4/16/2021	0.90	Call w/ co-counsel re: court order and motions	
CDM	4/16/2021	4.10	Drafting Motion To be Relieved as Counsel and Motion for Substitution of Plaintiff	

Atty	Date	Hours	Description	
CDM	4/16/2021	10.10	Drafting Motion To be Relieved as Counsel and Motion for Substitution of Plaintiff	
CDM	4/18/2021	8.20	Drafting Motion To be Relieved as Counsel and Motion for Substitution of Plaintiff	
CDM	4/19/2021	0.40	Emails w/ co-counsel re: Motion To be Relieved as Counsel and Motion for Substitution of Plaintiff	
CDM	4/19/2021	3.20	Finalizing Motion To be Relieved as Counsel and Motion for Substitution of Plaintiff	
CDM	4/20/2021	1.80	Finalizing, filing and serving Motion To be Relieved as Counsel and Motion for Substitution of Plaintiff	
CDM	4/20/2021	0.60	Emailing co-counsel re: serving Motion To be Relieved as Counsel on client	
CDM	4/21/2021	0.40	Emailing co-counsel re: serving Motion To be Relieved as Counsel on client	
CJM	7/12/2017	3.70	Research similar complaints; review DSL website and terms and conditions of service; review documents provided by client; perform legal research	
CJM	8/23/2017	1.00	Review file materials	
CJM	8/29/2017	0.60	Review Order re: MTD; discuss with CDM	
CJM	9/7/2017	3.40	Review file materials; draft/revise complaint	
CJM	9/7/2017	0.90	review file materials; draft/revise complaint	
CJM	9/21/2017	1.00	Revise complaint; draft CLRA notice letter	
СЈМ	9/22/2017	0.90	finalize draft complaint and CLRA letter; email to co-counsel providing same	
CJM	10/11/2017	1.00	phone call with client; revise complaint to identify only California class	
CJM	10/12/2017	1.00	Revise Complaint for CA only class; review/revise CLRA notice letter; circulate to the group for final approval	
CJM	10/18/2017	0.30	review draft complaint; email to client requesting additional documents	
CJM	10/27/2017	0.60	call with client re: complaint and venue	
CJM	3/22/2018	0.40	Discussion with CDM re: pre-suit discovery on issue of fiber-optic cable to node vs. fiber-optic cable to premises	
CJM	3/13/2019	1.10	review defendant's demurrer; call with co-counsel re: responsive brief	
CJM	3/26/2019	2.80	Rule 26 report and supporting documents (protective order, ESI protocol)	
CJM	3/31/2019	3.90	draft opposition to defendants' demurrer	
CJM	4/26/2019	1.20	review/revise discovery requests	
CJM	9/9/2019	0.60	review/revise mediation statement	
CJM	1/9/2020	1.00	review/revise discovery deficiency letter	
CJM	1/12/2020	1.00	draft discovery deficiency letter	
СЈМ	2/6/2020	0.80	call with co-counsel (.5); call with defense counsel re: discovery deficiencies	
CJM	2/27/2020	0.60	review/revise request for court conference re: discovery disputes	

Atty	Date	Hours	Description
СЈМ	3/11/2020	0.80	strategy call with co-counsel (.4); informal discovery conference with the court (.4)
CJM	3/12/2020	1.20	draft/revise discovery deficiency letter
CJM	4/1/2020	0.60	review DSL supplemental discovery responses and correspondence re: same
CJM	4/2/2020	1.60	draft/revise deficiency letter to defense counsel; discussion with CDM re: same

Halunen Law DSL Extreme - Case Cost Summary January 1, 2015 through November 16, 2022

Туре	Date	Num	Memo	Account	Amount
DSL Extreme					
Gen	08/31/2017	083117-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-4.30
Gen	11/30/2017	113017-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-7.40
Gen	11/30/2017	113017-Cost	DSL Extreme - Postage	Postage/Copies/Parking	-14.16
Gen	03/31/2018	033118-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-4.40
Gen	05/31/2018	053118-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-9.80
Gen	12/31/2018	123118-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-5.40
Gen	12/31/2018	123118-Cost	DSL Extreme - Postage	Postage/Copies/Parking	-6.67
Gen	02/28/2019	022819-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-5.70
Gen	03/31/2019	033119-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-28.40
Gen	04/30/2019	043019-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-11.40
Gen	04/30/2019	043019-Cost	DSL Extreme - Postage	Postage/Copies/Parking	-4.80
Gen	05/28/2019	052819-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-5.90
Gen	05/28/2019	052819-Cost	DSL Extreme - Postage	Postage/Copies/Parking	-1.95
Gen	06/30/2019	063019-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-2.50
Gen	06/30/2019	063019-Cost	DSL Extreme - Postage	Postage/Copies/Parking	-1.45
Bill	08/22/2019	4933548-200-D	DSL Extreme - Mediation Fee - 50% Share	Mediation Costs - Class	-1,825.00
Gen	08/31/2019	083119-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-1.80
Bill	09/24/2019	092819 Stmt	(CDM) Sun Country Airlines - DSL Extreme	Travel - Class	-547.60
Bill	09/24/2019	092819 Stmt	(CDM) Cocina Del Barrio - DSL Extreme	Meals & Entertainment - Class	-50.12
Bill	09/24/2019	092819 Stmt	(CDM) Standard Downtown LA - DSL Extreme	Travel - Class	-49.69
Bill	09/24/2019	092819 Stmt	(CDM) Hilton - DSL Extreme	Travel - Class	-232.43
Bill	09/24/2019	092819 Stmt	(CDM) Gardna Taxi Service - DSL Extreme	Travel - Class	-66.54
Bill	09/24/2019	092819 Stmt	(CDM) Uber - DSL Extreme	Travel - Class	-32.99
Bill	09/24/2019	092819 Stmt	(CDM) MSP Airport - DSL Extreme	Travel - Class	-38.00
Bill	09/24/2019	092819 Stmt	(CJM) Sun Country Airlines - DSL Extreme	Travel - Employment	-518.60
Bill	09/24/2019	092819 Stmt	(CJM) Hilton - DSL Extreme	Travel - Employment	-232.43
Gen	09/30/2019	093019-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-69.50
Bill	10/04/2019	4986632-DSLE	DSL Extreme - Mediation Fee - 50% Share	Mediation Costs - Class	-1,876.00
Bill	10/04/2019	4986632-DSLE	DSL Extreme - Mediation Fee - Michael Reeses' 50% Share	Mediation Costs - Class	-1,876.00
Bill	11/28/2019	112819 Stmt	(CDM) Delta Airlines - DSL Extreme	Travel - Class	-666.60
Bill	11/28/2019	112819 Stmt	(CDM) Uber - DSL Extreme	Travel - Class	-14.87
Bill	11/28/2019	112819 Stmt	(CDM) The Alley Restaurant, Newport Beach, CA - DSL Ex	Meals & Entertainment - Class	-45.00
Bill	11/28/2019	112819 Stmt	(CDM) Uber - DSL Extreme	Travel - Class	-14.74
Bill	11/28/2019	112819 Stmt	(CDM) Mill City Tavern - DSL Extreme	(V) Meals and Entertainment 5	-10.75
Bill	11/28/2019	112819 Stmt	(CDM) Cibo Express - DSL Extreme	(V) Meals and Entertainment 5	-3.54
Bill	11/28/2019	112819 Stmt	(CDM) CMT Anaheim, Garden Grove, CA - DSL Extreme	Meals & Entertainment - Class	-11.55
Bill	11/28/2019	112819 Stmt	(CDM) MSP Airport Parking - DSL Extreme	(V) Parking	-52.00
Bill	11/28/2019	112819 Stmt	(CDM) Hotel Irvine Jamboree, Irvine, CA - DSL Extreme	Travel - Class	-241.68
Bill	11/28/2019	112819 Stmt	(CDM) Hotel Irvine Jamboree, Irvine, CA - DSL Extreme	(V) Meals and Entertainment 5	-7.30
Gen	11/30/2019	113019-Cost	DSL Éxtreme - Copies	Postage/Copies/Parking	-3.10
Gen	12/31/2019	123119-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-33.60
Bill	01/02/2020	201912698037	DSL Extreme - Filing Fee	Filing Fees - Class	-41.00
Gen	01/31/2020	013120-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-7.30
Bill	02/12/2020	202001698037	DSL Extreme - Filing Fee	Filing Fees - Class	-104.40
Gen	02/29/2020	022920-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-6.80
Bill	03/02/2020	202002698037	DSL Extreme - Filing Fee	Filing Fees - Class	-129.40
Gen	03/31/2020	033120-Cost	DSL Extreme - Copies	Postage/Copies/Parking	- 21.70
Bill	04/01/2020	202003698037	DSL Extreme - Filing Fee	Filing Fees - Class	-104.00

Halunen Law DSL Extreme - Case Cost Summary

January 1, 2015 through November 16, 2022

Type	Date	Num	Memo	Account	Amount
Bill	04/23/2020	042320-DSLEx	DSL Extreme - Pro Hac Vice - CJM	Filing Fees - Class	-500.00
Bill	04/23/2020	042320-DSLEx	DSL Extreme - Pro Hac Vice - CDM	Filing Fees - Class	-500.00
Gen	04/30/2020	043020-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-0.10
Bill	05/01/2020	202004698037	DSL Extreme - Filing Fee	Filing Fees - Class	-20.00
Bill	06/01/2020	202005698037	DSL Extreme - Filing Fee	Filing Fees - Class	-11.00
Bill	07/01/2020	202006698037	DSL Extreme - Filing Fee	Filing Fees - Class	-19.00
Bill	07/28/2020	072820 Stmt	(HL) LA Court Filing Fee - DSL Extreme	Filing Fees - Class	-15.00
Bill	08/03/2020	202007698037	DSL Extreme - Filing Fee	Filing Fees - Class	-107.00
Bill	09/01/2020	202008698037	DSL Extreme - Filing Fee	Filing Fees - Class	-11.00
Bill	09/29/2020	20413-DSLExtr	DSL Extreme - Case Setup	Outside Consultants - Class	-1,300.00
Bill	10/01/2020	202009698037	DSL Extreme - Filing Fee	Filing Fees - Class	-36.00
3ill	11/01/2020	202010698037	DSL Extreme - Filing Fee	Filing Fees - Class	-11.00
3ill	12/01/2020	202011698037	DSL Extreme - Filing Fee	Filing Fees - Class	-11.00
Bill	01/04/2021	202012698037	DSL Extreme - Filing Fee	Filing Fees - Class	-11.00
Bill	02/01/2021	202101698037	File & Servexpress - DSL Extreme - Filing Fee	Filing Fees - Class	-11.00
Bill	03/01/2021	202102698037	File & Servexpress - DSL Extreme - Filing Fee	Filing Fees - Class	-11.00
Gen	03/24/2021	022421-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-0.70
Bill	03/31/2021	033121-DSLEx	DSL Extreme - Pro Hac Vice - CJM	Filing Fees - Class	-500.00
Bill	03/31/2021	033121-DSLEx	DSL Extreme - Pro Hac Vice - CDM	Filing Fees - Class	-500.00
Bill	04/01/2021	202103698037	File & Servexpress - DSL Extreme - Filing Fee	Filing Fees - Class	-11.00
Gen	04/30/2021	043021-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-9.20
Bill	05/03/2021	202104698037	File & Servexpress - DSL Extreme - Filing Fee	Filing Fees - Class	-61.00
Bill	05/28/2021	052821 Stmt	(HL) Filing Fee (LA Court) - DSL Extreme	Filing Fees - Class	-15.00
Gen	05/31/2021	053121-Cost	DSL Extreme - Copies	Postage/Copies/Parking	-34.40
al DSL Ex	xtreme				-12,755.66
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