

1 Jesse S. Johnson (*pro hac vice*)  
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8 *Class counsel*

9 UNITED STATES DISTRICT COURT  
10 FOR THE DISTRICT OF ARIZONA

11 Daniel J. Rodriguez, on behalf of himself  
12 and others similarly situated,

13 Plaintiff,

14 vs.

15 QS Next Chapter LLC f/k/a Express  
16 Interlock LLC d/b/a QuickStart Ignition  
17 Interlock,

18 Defendant.

) Case No. CV-20-00897-PHX-DJH

)

)

) **DECLARATION OF JESSE S.**

) **JOHNSON IN SUPPORT OF**

) **PLAINTIFF'S MOTION FOR**

) **ATTORNEYS' FEES, COSTS, AND**

) **LITIGATION EXPENSES**

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1 Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

2 1. My name is Jesse S. Johnson.

3 2. I am over twenty-one years of age, and I am fully competent to make the  
4 statements contained in this declaration.

5 3. I have personal knowledge of the matters stated herein and, if called upon,  
6 could and would competently testify thereto.

7 4. I am a partner at the law firm of Greenwald Davidson Radbil PLLC  
8 (“GDR”), the Court-appointed class counsel in this matter.

9 5. I am admitted before this Court *pro hac vice*.

10 6. GDR handled this case on a contingency basis and advanced all litigation  
11 costs and expenses.

12 7. To date, GDR has not received any payment for its work on behalf of  
13 Daniel J. Rodriguez (“Plaintiff”) and the settlement class.

14 **Class Counsel**

15 8. Three attorneys at GDR made substantial contributions to this litigation.<sup>1</sup>

16 9. I graduated from the University of Florida in 2005 and from the University  
17 of Florida Fredric G. Levin College of Law in 2009.

18 10. I have extensive experience litigating consumer protection class actions,  
19 including those brought under the Consumer Leasing Act (“CLA”), Truth in Lending  
20 Act, Fair Debt Collection Practices Act (“FDCPA”), and Telephone Consumer Protection  
21 Act.

22 11. Prior to joining GDR, I spent five years as a litigator at Robbins Geller  
23 Rudman & Dowd LLP—one of the nation’s largest plaintiffs’ class action firms.

24 12. My practice there focused on complex class actions, including securities  
25 fraud, corporate governance, and consumer fraud litigation.

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27  
28 <sup>1</sup> Two other GDR attorneys also contributed work here, but in an exercise of billing discretion, GDR has marked their time as non-billable and does not seek recompense for their efforts.

1           13. Senior partners Michael L. Greenwald and James L. Davidson also assisted  
2 here.

3           14. Mr. Greenwald graduated from the University of Virginia in 2001 and  
4 Duke University School of Law in 2004.

5           15. Mr. Greenwald has been appointed class counsel in numerous consumer  
6 protection class actions throughout the country. *See* [http://www.gdrlawfirm.com/michael-](http://www.gdrlawfirm.com/michael-greenwald)  
7 [greenwald](http://www.gdrlawfirm.com/michael-greenwald).

8           16. He has more than 16 years of litigation experience, including in excess of  
9 13 years litigating class actions.

10           17. Mr. Davidson graduated from the University of Florida in 2000 and the  
11 University of Florida Fredric G. Levin College of Law in 2003.

12           18. Mr. Davidson also has been appointed class counsel in a host of consumer  
13 protection class actions nationwide. *See* <http://www.gdrlawfirm.com/James-Davidson>.

14           19. He has more than 16 years of litigation experience, including in excess of  
15 11 years litigating class actions.

16           20. GDR has been appointed class counsel in dozens of consumer protection  
17 class actions in this district and throughout the country. *See, e.g., Brockman v. Mankin*  
18 *Law Grp., P.A.*, No. 20-893, 2020 WL 6106890 (M.D. Fla. Oct. 14, 2020); *Hernandez v.*  
19 *State Road Auto Sales, Inc.*, No. 19-11525, ECF No. 34 (D. Mass. Aug. 14, 2020);  
20 *Danger v. Nextep Funding, LLC*, No. 18-567, 2020 WL 4034822 (D. Minn. July 17,  
21 2020); *Claxton v. Alliance CAS, LLC*, No. 19-61002, 2020 WL 2759826 (S.D. Fla. May  
22 27, 2020); *Riddle v. Atkins & Ogle Law Offices, LC*, No. 19-249, 2020 WL 1303939  
23 (S.D. W. Va. Feb. 26, 2020); *Taylor v. TimePayment Corp.*, No. 18-378, 2020 WL  
24 906319 (E.D. Va. Feb. 24, 2020); *Sullivan v. Marinosci Law Grp., P.C., P.A.*, No. 18-  
25 81368, 2019 WL 6709575 (S.D. Fla. Nov. 22, 2019); *Sheean v. Convergent Outsourcing,*  
26 *Inc.*, No. 18-11532, 2019 WL 6039921 (E.D. Mich. Nov. 14, 2019); *Knapper v. Cox*  
27 *Comm'ns, Inc.*, 329 F.R.D. 238 (D. Ariz. 2019) (Logan, J.); *Hoffman v. Law Office of*  
28 *Fradkin & Weber, P.A.*, No. 19-163, 2019 WL 2723581 (D. Md. July 1, 2019); *Williams*

1 *v. Bluestem Brands, Inc.*, No. 17-1971, 2019 WL 1450090 (M.D. Fla. Apr. 2, 2019);  
2 *Spencer v. #1 A LifeSafer of Ariz., LLC*, No. 18-2225, 2019 WL 1034451 (D. Ariz. Mar.  
3 4, 2019) (Bade, M.J.); *Dickens v. GC Servs. Ltd. P'ship*, No. 16-803, 2018 WL 4732478  
4 (M.D. Fla. Oct. 2, 2018); *Johnson v. NPAS Solutions, LLC*, No. 17-80393, 2017 WL  
5 6060778 (S.D. Fla. Dec. 4, 2017); *Beck v. Thomason Law Firm, LLC*, No. 16-570, 2017  
6 WL 3267751 (D.N.M. July 27, 2017); *James v. JPMorgan Chase Bank, N.A.*, No. 15-  
7 2424, 2017 WL 2472499 (M.D. Fla. June 5, 2017); *Johnston v. Kass Shuler, P.A.*, No.  
8 16-3390, 2017 WL 1231070 (M.D. Fla. Mar. 29, 2017); *Ryan v. DeVille Asset Mgmt.,*  
9 *Ltd.*, No. 15-1067, 2016 WL 7165751 (D. Or. Dec. 7, 2016); *Jallo v. Resurgent Capital*  
10 *Servs., L.P.*, No. 14-449, 2016 WL 6610322 (E.D. Tex. Nov. 8, 2016); *Rhodes v. Nat'l*  
11 *Collection Sys., Inc.*, 317 F.R.D. 579 (D. Colo. 2016); *Gonzalez v. Germaine Law Office*  
12 *PLC*, No. 15-1427, 2016 WL 5844605 (D. Ariz. Oct. 3, 2016) (Silver, J.); *McCurdy v.*  
13 *Prof'l Credit Serv.*, No. 15-1498, 2016 WL 5853721 (D. Or. Oct. 3, 2016); *Marcoux v.*  
14 *Susan J. Szwed, P.A.*, No. 15-93, 2016 WL 5720713 (D. Me. Oct. 3, 2016); *Cobb v.*  
15 *Edward F. Bukaty, III, PLC*, No. 15-335, 2016 WL 4925165 (M.D. La. Sept. 14, 2016);  
16 *Cross v. Wells Fargo Bank, N.A.*, No. 15-1270, 2016 WL 5109533 (N.D. Ga. Sept. 13,  
17 2016); *Schell v. Frederick J. Hanna & Assocs., P.C.*, No. 15-418, 2016 WL 3654472  
18 (S.D. Ohio July 8, 2016); *Schuchardt v. Law Office of Rory W. Clark*, 314 F.R.D. 673  
19 (N.D. Cal. 2016); *Whitford v. Weber & Olcese, P.L.C.*, No. 15-400, 2016 WL 122393  
20 (W.D. Mich. Jan. 11, 2016); *Garza v. Mitchell Rubenstein & Assocs., P.C.*, No. 15-1572,  
21 2015 WL 9594286 (D. Md. Dec. 28, 2015); *Baldwin v. Glasser & Glasser, P.L.C.*, No.  
22 15-490, 2015 WL 77669207 (E.D. Va. Dec. 1, 2015); *McWilliams v. Advanced Recovery*  
23 *Sys., Inc.*, 310 F.R.D. 337 (S.D. Miss. 2015); *Rhodes v. Olson Assocs., P.C. d/b/a Olson*  
24 *Shaner*, 83 F. Supp. 3d 1096 (D. Colo. 2015); *Roundtree v. Bush Ross, P.A.*, 304 F.R.D.  
25 644 (M.D. Fla. 2015); *Gonzalez v. Dynamic Recovery Solutions, LLC*, Nos. 14-24502,  
26 14-20933, 2015 WL 738329 (S.D. Fla. Feb. 23, 2015).

27 21. Over the past five years, GDR has been appointed class counsel in class  
28 actions that recovered more than \$100 million in total for consumers nationwide.

1           22. Multiple district courts have commented on GDR’s useful knowledge and  
2 experience in connection with class action litigation. For example, Judge McNamee of  
3 this district stated upon granting final approval to a class settlement:

4           I want to thank all of you. It’s been a pleasure. I hope that you will come  
5 back and see us at some time in the future. And if you don’t, I have a lot of  
6 cases I would like to assign you, because you’ve been immensely helpful  
7 both to your clients and to the Court. And that’s important. So I want to  
8 thank you all very much.

8 *Ritchie v. Van Ru Credit Corp.*, No. 12-1714 (D. Ariz. July 21, 2014).

9           23. In *Schwyhart v. AmSher Collection Servs., Inc.*, Judge John E. Ott, Chief  
10 Magistrate Judge of the Northern District of Alabama, stated upon granting final approval  
11 of a class action settlement in which he appointed GDR as class counsel:

12           I cannot reiterate enough how impressed I am with both your handling of  
13 the case, both in the Court’s presence as well as on the phone conferences,  
14 as well as in the written materials submitted. . . . I am very satisfied and I  
15 am very pleased with what I have seen in this case. As a judge, I don’t get  
16 to say that every time, so that is quite a compliment to you all, and thank  
17 you for that.

16 No. 15-1175 (N.D. Ala. Mar. 15, 2017).

17           24. In *McWilliams v. Advanced Recovery Sys., Inc.*, Judge Carlton W. Reeves  
18 of the Southern District of Mississippi described GDR as follows:

19           More important, frankly, is the skill with which plaintiff’s counsel litigated  
20 this matter. On that point there is no disagreement. Defense counsel  
21 concedes that her opponent—a specialist in the field who has been class  
22 counsel in dozens of these matters across the country—‘is to be  
23 commended for his work’ for the class, ‘was professional at all times’ . . . ,  
24 and used his ‘excellent negotiation skills’ to achieve a settlement fund  
25 greater than that required by the law. The undersigned concurs . . . .  
26 Counsel’s level of experience in handling cases brought under the FDCPA,  
27 other consumer protection statutes, and class actions generally cannot be  
28 overstated.

26 No. 15-70, 2017 WL 2625118, at \*3 (S.D. Miss. June 16, 2017).

1           25. More recently, in *Riddle v. Atkins & Ogle Law Offices, LC*, Judge Robert C.  
2 Chambers of the Southern District of West Virginia noted in approving a class settlement  
3 and awarding attorneys' fees:

4           GDR is an experienced firm that has successfully litigated many complex  
5 consumer class actions. Because of its experience, GDR has been appointed  
6 class counsel in many class actions throughout the country, including  
7 several in the Fourth Circuit. GDR employed that experience here in  
8 negotiating a favorable result that avoids protracted litigation, trial, and  
9 appeals.

10 No. 19-249, 2020 WL 3496470, at \*3 (S.D. W. Va. June 29, 2020) (internal citations  
11 omitted).

12           26. As well, in *Leboeuf v. Forster & Garbus LLP*, Judge Wendy B. Vitter of  
13 the Eastern District of Louisiana recently stated the following regarding GDR's work:

14           Then the other two factors that the Court is required to take into  
15 consideration are the adequacy of the class representation and, as I stated on  
16 the record, I think Ms. Leboeuf and the class have been very ably  
17 represented. The briefing in this case has been superior. Again, I think it  
18 could be textbook material on how to handle a class action from all counsel  
19 in this matter. It's been enlightening for me as a Court, especially as a first-  
20 year judge, and I appreciated it very much.

21 No. 19-845 (E.D. La. July 2, 2020).

22           27. More information about GDR's practice is available on the firm's website:  
23 [www.gdrllawfirm.com](http://www.gdrllawfirm.com).

24           28. GDR has vigorously protected, and will continue to so protect, the interests  
25 of the members of the settlement class.

26           29. GDR has advanced all costs necessary to successfully prosecute this action  
27 to date, and it will continue to do so through final approval.

28           30. I submit this declaration in support of Plaintiff's motion for attorneys' fees,  
costs, and litigation expenses, which I believe to be warranted and well deserved  
considering the excellent results achieved here, and my firm's dedicated efforts in  
achieving those results.

**Class Settlement Terms**

1  
2 31. QS Next Chapter, LLC f/k/a Express Interlock LLC d/b/a QuickStart  
3 Ignition Interlock (“Defendant”) will create a \$21,490 class settlement fund for the  
4 benefit of more than 6,100 potential class members, resulting in anticipated per-claimant  
5 recoveries of \$17 to \$35 based on historical participation rates.

6 32. Notably, this settlement fund amounts to more than one percent of  
7 Defendant’s balance sheet net worth—the legal cap on class statutory damages imposed  
8 by the CLA.

9 33. After efforts to forward checks to available forwarding addresses,  
10 unclaimed settlement funds will be redirected to Special Olympics of Arizona as the  
11 designated *cy pres* award recipient rather than revert to Defendant.

12 34. Defendant separately will pay \$1,500 to Plaintiff in recognition of his  
13 service to class members, subject to the Court’s approval.

14 35. Additionally, Defendant no longer uses the form ignition interlock lease  
15 agreement underlying this litigation.

16 36. Defendant separately paid all costs of class notice and will continue to  
17 separately pay for settlement administration, to be conducted by First Class, Inc.—the  
18 Court-appointed administrator.

19 37. Finally, Defendant separately will pay an award of attorneys’ fees, costs,  
20 and litigation expenses to GDR, in an amount ultimately determined by the Court.

21 38. Such fees and costs—in whatever amount this Court awards—will not  
22 dilute Plaintiff’s or the class’s recoveries.

**GDR’s Reasonable Attorneys’ Fees**

23  
24 39. The attorneys’ fees requested here are fair and well-supported in this  
25 certified class action benefitting thousands of consumers statewide.

26 40. For the better part of this year, GDR’s attorneys devoted significant time  
27 and resources to developing, and ultimately settling, this case on behalf of more than  
28 6,100 consumers, including: (a) conducting an investigation into the underlying facts

1 regarding Plaintiff's and the class's claims; (b) preparing a class action complaint; (c)  
2 researching the law pertinent to class members' claims and Defendant's defenses; (d)  
3 assessing class damages and negotiating the parameters of the class settlement now  
4 before this Court, which included several demands and counteroffers and corresponding  
5 telephone conferences among counsel to work through details of the same; (e) conferring  
6 repeatedly with Plaintiff and defense counsel throughout the litigation, beyond the  
7 aforementioned settlement discussions; (f) preparing the parties' class settlement  
8 agreement, along with the proposed direct mail and long-form class notices; (g)  
9 coordinating with First Class and defense counsel to devise a class notice and settlement  
10 administration program to best serve class members; (h) preparing Plaintiff's motion for  
11 preliminary approval of the class settlement, the proposed order accompanying the same,  
12 and counsel's supporting declaration; (i) upon the Court's preliminary approval of the  
13 settlement, coordinating with First Class and defense counsel to finalize the class notice  
14 program; (j) responding to class member inquiries regarding the settlement; (k) preparing  
15 Plaintiff's motion for attorneys' fees, costs, and litigation expenses, and the proposed  
16 order accompanying the same; and (l) preparing the instant declaration supporting that  
17 motion.

18 41. What's more, before this case concludes, GDR's attorneys still must: (1)  
19 research and prepare Plaintiff's reply brief in support of his motion for attorneys' fees,  
20 costs, and litigation expenses; (2) prepare Plaintiff's motion for final approval of the class  
21 settlement, and the corresponding proposed final approval order and judgment; (3)  
22 prepare for and attend the final fairness hearing in Phoenix in March 2021; (4) confer  
23 with First Class over the administration of claims and, upon final approval, class  
24 settlement checks; and (5) continue to confer with class members as necessary to answer  
25 questions or address concerns related to the settlement.

26 42. In sum, GDR worked efficiently and effectively to develop Plaintiff and the  
27 class's claims and successfully negotiate a class-wide settlement that guarantees relief  
28

1 beyond what the statute provides, and it did so while navigating the risks of contingent  
2 class action litigation.

3 43. As of the date of this declaration, GDR's attorneys have billed a collective  
4 total of 80 hours litigating this case, which does *not* include several more hours of GDR's  
5 attorneys' time that have been zeroed out as non-billable in an exercise of billing  
6 discretion.

7 44. A detailed accounting of the time spent on this matter is attached as Exhibit  
8 A.

9 45. GDR's attorneys entered these time records contemporaneously with the  
10 tasks to which they relate, so the records reflect a true and accurate copy of GDR's time  
11 entries in this case.

12 46. As the lead attorney on this case, I have spent a total of 68.8 hours to bring  
13 Plaintiff's and the class's claims to this point; moreover, in support, Mr. Greenwald has  
14 contributed 1.3 hours, and Mr. Davidson 9.9 hours.

15 47. Additionally, I conservatively estimate that this case will require an  
16 additional 40 hours of my time to complete, which will be spent on the various tasks  
17 listed above still needed to usher this settlement through final approval.

18 48. I billed my time here at a rate of \$400 per hour, while Mr. Greenwald and  
19 Mr. Davidson each billed at a rate of \$450 per hour.

20 49. Over the past year, several federal courts have determined GDR's rates to  
21 be reasonable for consumer protection class litigation like this. *See, e.g., Lloyd v. James*  
22 *E. Albertelli, P.A.*, No. 20-60300, 2020 WL 7295767, at \*2 (S.D. Fla. Dec. 10, 2020);  
23 *Newman v. Edoardo Meloni, P.A.*, No. 20-60027, 2020 WL 5269442, at \*2 (S.D. Fla.  
24 Sept. 4, 2020); *Riddle*, 2020 WL 3496470, at \*2; *Aikens v. Malcolm Cisneros, A Law*  
25 *Corp.*, No. 17-2462, ECF No. 76 at 16 (C.D. Cal. Jan. 2, 2020); *Dickens v. GC Servs. Ltd.*  
26 *P'ship*, No. 16-803, 2019 WL 1771524, at \*1 (M.D. Fla. Apr. 10, 2019).

27 50. Multiplying the hours incurred by each GDR attorney by his applicable  
28 hourly rate produces a current lodestar of \$32,560; further, including my additional

1 estimated time necessary to conclude this matter (40 hours) yields a total estimated  
2 lodestar here of \$48,560.

3 **Reimbursement of Reasonable Costs and Litigation Expenses**

4 51. Separately from the foregoing attorneys' fees, Plaintiff also seeks for his  
5 counsel reimbursement of costs and litigation expenses reasonably incurred in connection  
6 with the prosecution of Plaintiff and the class's claims.

7 52. Such costs and expenses are reflected in the books and records maintained  
8 by undersigned counsel, which are an accurate recording of the expenses incurred.

9 53. To date, GDR has incurred \$584.40 in costs and litigation expenses, which  
10 include the filing fee for the complaint (\$400), the fee for service of process on  
11 Defendant (\$65), costs for counsel's *pro hac vice* admission (\$119), and PACER charges  
12 for case documents (\$0.40).

13 54. GDR also anticipates incurring additional expenses associated with travel  
14 from Boca Raton, Florida to Phoenix for the final fairness hearing, including airport  
15 parking, airfare, hotel lodging, and transportation and meal costs during travel.

16 55. Counsel estimates that these additional expenses will total approximately  
17 \$700 but will provide specific reimbursement figures, once incurred, in advance of the  
18 final fairness hearing.

19 56. GDR also has incurred additional reimbursable expenses not itemized  
20 herein—for example, for printing, photocopies, long distance telephone calls, and  
21 computerized legal research—but Plaintiff and his counsel do not seek separate  
22 reimbursement for any of the foregoing.

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# **Exhibit A**

## Project Summary

Date Start: 1/1/2018 | Date End: 12/18/2020 | Clients: Rodriguez, Daniel | Projects: QuickStart | Users: James Davidson, Jesse Johnson, Michael Greenwald | Account Managers: All

Project ID	Date	User	Description	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
	<b>Rodriguez, Daniel</b>						
<b>10628</b>	<b>QuickStart</b>						
	03/25/2020	Jesse Johnson	Correspondence with referring counsel	400.00 hr	0.10	0.10	40.00
	04/01/2020	Jesse Johnson	Attention to retainer agreement & statement of client's rights.	400.00 hr	0.30	0.30	120.00
	04/01/2020	Jesse Johnson	Correspondence with referring counsel	400.00 hr	0.10	0.10	40.00
	04/01/2020	Jesse Johnson	Discussion with litigation team re: potential claims	400.00 hr	0.10	0.10	40.00
	04/01/2020	Michael Greenwald	Discussion with litigation team re potential case and next steps.	0 hr	0.10	0	0.00
	04/01/2020	James Davidson	Discussion with litigation team re potential new case.	450.00 hr	0.10	0.10	45.00
	04/01/2020	Jesse Johnson	Review potential client's documentation (.2); initial phone consultation with potential client re: possible claims (.7)	400.00 hr	0.90	0.90	360.00
	04/02/2020	Jesse Johnson	Correspondence with client (.1); research defendant entities (.8)	400.00 hr	0.90	0.90	360.00
	04/07/2020	James Davidson	Attention to file opening and time transfer.	0 hr	0.20	0	0.00
	04/13/2020	Jesse Johnson	Research and prepare draft class action complaint	400.00 hr	1.20	1.20	480.00
	04/15/2020	Jesse Johnson	Continue researching and preparing draft class action complaint	400.00 hr	1.70	1.70	680.00
	04/16/2020	Jesse Johnson	Correspondence with client re: draft complaint	400.00 hr	0.10	0.10	40.00
	04/16/2020	Jesse Johnson	Continue researching and preparing draft class action complaint	400.00 hr	3.80	3.80	1,520.00
	04/17/2020	Jesse Johnson	Correspondence with client	400.00 hr	0.10	0.10	40.00
	04/21/2020	Jesse Johnson	Correspondence with client	400.00 hr	0.10	0.10	40.00
	04/21/2020	Jesse Johnson	Phone call with client to discuss draft complaint	400.00 hr	0.30	0.30	120.00
	04/21/2020	Jesse Johnson	Revise draft complaint following phone call with client (.2); strategy with JLD re: draft complaint (.1)	400.00 hr	0.30	0.30	120.00
	04/22/2020	James Davidson	Review and comment on draft class action complaint and prepare correspondence to JJ re same.	450.00 hr	1.00	1.00	450.00
	04/22/2020	Jesse Johnson	Correspondence with referring counsel re: draft complaint	400.00 hr	0.10	0.10	40.00
	04/22/2020	Jesse Johnson	Revise draft complaint, per JLD comments (.3); correspondence with client re: draft complaint (.1)	400.00 hr	0.40	0.40	160.00
	04/29/2020	Jesse Johnson	Correspondence with client re: draft complaint	400.00 hr	0.10	0.10	40.00
	04/30/2020	Jesse Johnson	Correspondence with referring counsel	400.00 hr	0.10	0.10	40.00
	04/30/2020	Jesse Johnson	Correspondence with client	400.00 hr	0.10	0.10	40.00
	04/30/2020	Jesse Johnson	Review case-related documents	400.00 hr	0.20	0.20	80.00
	05/04/2020	Jesse Johnson	Correspondence with client	400.00 hr	0.10	0.10	40.00
	05/06/2020	Jesse Johnson	Discussion with litigation team re: draft complaint	400.00 hr	0.10	0.10	40.00
	05/06/2020	Michael Greenwald	Discussion with litigation team re case strategy and next steps.	0 hr	0.10	0	0.00
	05/06/2020	James Davidson	Discussion with litigation team re complaint status.	450.00 hr	0.10	0.10	45.00
	05/06/2020	Jesse Johnson	Correspondence with client re: draft complaint	400.00 hr	0.10	0.10	40.00
	05/07/2020	Jesse Johnson	Correspondence with client	400.00 hr	0.10	0.10	40.00
	05/08/2020	Jesse Johnson	Respond to inquiry about case	400.00 hr	0.30	0.30	120.00
	05/08/2020	Jesse Johnson	Review and finalize final draft of class action complaint, including all supporting exhibits and other documents	400.00 hr	0.80	0.80	320.00
	05/08/2020	James Davidson	Review judge assignment and discuss with JJ.	450.00 hr	0.20	0.20	90.00

05/08/2020	Jesse Johnson	Review judicial assignment and discuss with JLD.	400.00 hr	0.20		80.00	80.00
05/11/2020	Jesse Johnson	Service of complaint and summons	65.00 ea	1.00		65.00	65.00
05/11/2020	Jesse Johnson	Fee for SD Fla Cert of Good Standing for use with pro hac vice application	19.00 ea	1.00		19.00	19.00
05/11/2020	Jesse Johnson	Review correspondence from clerk re: JSJ PHV application deadline, and attention to calendar for same	400.00 hr	0.10		0.10	40.00
05/11/2020	Jesse Johnson	Correspondence with process server re service of complaint and summons	400.00 hr	0.20		0.20	80.00
05/11/2020	Jesse Johnson	Correspondence with client re: filing of complaint	400.00 hr	0.10		0.10	40.00
05/11/2020	James Davidson	Review order regarding filing motions to dismiss.	450.00 hr	0.10		0.10	45.00
05/11/2020	Jesse Johnson	Review order re: meet and confer requirements for Rule 12b motions, and attention to service of same	400.00 hr	0.20		0.20	80.00
05/11/2020	Jesse Johnson	Begin researching and preparing JSJ pro hac vice application	400.00 hr	0.20		0.20	80.00
05/11/2020	Jesse Johnson	Review case-related documents (.4), and response to inquiry from referring counsel (.1)	400.00 hr	0.50		0.50	200.00
05/18/2020	Jesse Johnson	JSJ PHV application fee	100.00 ea	1.00		100.00	100.00
05/18/2020	Jesse Johnson	Prepare and finalize JSJ pro hac vice application with supporting exhibits	400.00 hr	0.80		0.80	320.00
05/18/2020	Jesse Johnson	Review order granting JSJ PHV application	400.00 hr	0.10		0.10	40.00
05/19/2020	Jesse Johnson	Charges for retrieving document from PACER	0.40 ea	1.00		0.40	0.40
05/19/2020	Jesse Johnson	Review order setting scheduling conference.	400.00 hr	0.10		0.10	40.00
05/19/2020	James Davidson	Review order setting Rule 16 conference.	450.00 hr	0.10		0.10	45.00
05/21/2020	Jesse Johnson	Prepare and finalize Plaintiff's notice of service of May 11, 2020 order on Defendant	400.00 hr	0.30		0.30	120.00
05/28/2020	Jesse Johnson	Correspondence with defense counsel	400.00 hr	0.20		0.20	80.00
05/28/2020	Jesse Johnson	Phone call with defense counsel to discuss extension for response deadline, and potential class settlement	400.00 hr	0.40		0.40	160.00
05/28/2020	Jesse Johnson	Following call with defense counsel, research Defendant and discuss with litigation possibility of class settlement	400.00 hr	0.30		0.30	120.00
05/28/2020	Jesse Johnson	Correspondence with referring counsel	400.00 hr	0.20		0.20	80.00
05/29/2020	Jesse Johnson	Review NOT of appearance by D. Funkhouser and J. Gale for Defendant	400.00 hr	0.10		0.10	40.00
06/01/2020	James Davidson	Review Defendant's notice of appearance.	450.00 hr	0.10		0.10	45.00
06/01/2020	James Davidson	Review correspondence from JJ re initial call with defense counsel.	450.00 hr	0.10		0.10	45.00
06/02/2020	Jesse Johnson	Correspondence with defense counsel	400.00 hr	0.10		0.10	40.00
06/02/2020	Michael Greenwald	Discussion with JJ and JD re case and settlement strategy.	0 hr	0.50		0	0.00
06/02/2020	Jesse Johnson	Phone call with MLG and JLD to discuss settlement strategy	400.00 hr	0.50		0.50	200.00
06/02/2020	James Davidson	Discussion with JJ and MG re potential settlement.	450.00 hr	0.50		0.50	225.00
06/03/2020	Jesse Johnson	Review Defendant's proposed motion for extension of time to respond to complaint, and correspondence with defense counsel re: same	400.00 hr	0.20		0.20	80.00
06/04/2020	Jesse Johnson	Review order granting Defendant's motion for extension of time	400.00 hr	0.10		0.10	40.00
06/04/2020	Michael Greenwald	Review ORDER that Defendant's [10] Unopposed Motion for Extension of Time to Respond to Complaint is GRANTED.	0 hr	0.10		0	0.00
06/05/2020	James Davidson	Review order granting extension of time to respond to complaint.	450.00 hr	0.10		0.10	45.00
06/08/2020	Jesse Johnson	Research and prepare class settlement demand (.5); litigation strategy with team re: same (.1)	400.00 hr	0.60		0.60	240.00
06/08/2020	James Davidson	Review and comment on draft settlement demand letter.	450.00 hr	0.30		0.30	135.00
06/08/2020	James Davidson	Discussion with MG and JJ re settlement.	450.00 hr	0.20		0.20	90.00
06/08/2020	Jesse Johnson	Settlement strategy discussion with JLD, MLG	400.00 hr	0.20		0.20	80.00
06/08/2020	Michael Greenwald	Discussion with JD and JJ re settlement strategy.	0 hr	0.20		0	0.00
06/08/2020	Michael Greenwald	Review and revise settlement demand letter.	450.00 hr	0.10		0.10	45.00

06/08/2020	Jesse Johnson	Revise class settlement demand, per JLD comments.	400.00 hr	0.10	0.10	40.00
06/08/2020	Jesse Johnson	Phone call with client to discuss class settlement demand	400.00 hr	0.20	0.20	80.00
06/11/2020	Jesse Johnson	Finalize class demand (.3), and related correspondence with defense counsel (.1)	400.00 hr	0.40	0.40	160.00
06/16/2020	James Davidson	Review Defendant's June 15, 2020 counteoffer letter and discuss with JJ and MG.	450.00 hr	0.20	0.20	90.00
06/16/2020	Michael Greenwald	Review and consider settlement counter-proposal from Defendant.	0 hr	0.20	0	0.00
06/16/2020	Jesse Johnson	Prepare class settlement counterproposal (.4); correspondence with defense counsel re: same (.1)	400.00 hr	0.50	0.50	200.00
06/16/2020	Jesse Johnson	Review settlement correspondence from defense counsel, and discuss same with litigation team	400.00 hr	0.20	0.20	80.00
06/17/2020	James Davidson	Discussion with JJ re settlement administrators.	450.00 hr	0.30	0.30	135.00
06/17/2020	Michael Greenwald	Review settlement counter-demand.	0 hr	0.10	0	0.00
06/17/2020	Jesse Johnson	Litigation strategy with JLD re: class administrators	400.00 hr	0.30	0.30	120.00
06/22/2020	Jesse Johnson	Correspondence with defense counsel	400.00 hr	0.10	0.10	40.00
06/22/2020	James Davidson	Discussion with JJ re settlement.	450.00 hr	0.20	0.20	90.00
06/22/2020	Jesse Johnson	Phone call with defense counsel to discuss class settlement negotiations (.1); following call, settlement strategy with JLD (.2)	400.00 hr	0.30	0.30	120.00
06/22/2020	Jesse Johnson	Correspondence with B. Hughes re: administration proposal for class settlement	400.00 hr	0.10	0.10	40.00
06/23/2020	Jesse Johnson	Review class notice and administration proposal from First Class	400.00 hr	0.20	0.20	80.00
06/24/2020	Jesse Johnson	Review settlement correspondence from defense counsel	400.00 hr	0.10	0.10	40.00
06/24/2020	Michael Greenwald	Review and consider settlement correspondence from defense counsel.	0 hr	0.10	0	0.00
06/25/2020	Jesse Johnson	Complaint filing fee	400.00 ea	1.00	400.00	400.00
06/25/2020	Jesse Johnson	Phone call with defense counsel to discuss class settlement terms	400.00 hr	0.20	0.20	80.00
06/25/2020	Jesse Johnson	Phone call with client to discuss class settlement terms	400.00 hr	0.10	0.10	40.00
06/25/2020	Michael Greenwald	Review and revise latest settlement demand correspondence to defense counsel.	450.00 hr	0.10	0.10	45.00
06/25/2020	Jesse Johnson	Prepare class settlement counteroffer to Defendant (.3); correspondence with defense counsel re: same (.1)	400.00 hr	0.40	0.40	160.00
06/26/2020	James Davidson	Review Defendant's June 24, 2020 counteroffer letter.	450.00 hr	0.10	0.10	45.00
07/01/2020	Jesse Johnson	Correspondence with defense counsel re: upcoming discovery deadlines	400.00 hr	0.10	0.10	40.00
07/02/2020	Jesse Johnson	Settlement correspondence with defense counsel	400.00 hr	0.20	0.20	80.00
07/06/2020	Michael Greenwald	Review correspondence from defense counsel confirming terms of settlement.	0 hr	0.10	0	0.00
07/06/2020	James Davidson	Review correspondence from D. Funkhouser confirming terms of settlement.	450.00 hr	0.10	0.10	45.00
07/06/2020	James Davidson	Review and comment on draft notice of settlement.	450.00 hr	0.10	0.10	45.00
07/06/2020	Jesse Johnson	Prepare notice of class settlement (.3), and revise per JLD comments (.1); correspondence with defense counsel re: notice (.1)	400.00 hr	0.50	0.50	200.00
07/08/2020	Jesse Johnson	Finalize notice of class settlement, and correspondence with defense counsel re: same	400.00 hr	0.20	0.20	80.00
07/08/2020	Michael Greenwald	Review notice of settlement.	0 hr	0.10	0	0.00
07/13/2020	Jesse Johnson	Review order staying case for 30 days.	400.00 hr	0.10	0.10	40.00
07/14/2020	James Davidson	Review order vacating Rule 16 conference.	450.00 hr	0.10	0.10	45.00
07/14/2020	Michael Greenwald	Review order vacating Rule 16 conference in light of settlement agreement, and setting deadline for preliminary approval motion.	0 hr	0.10	0	0.00
07/15/2020	Jesse Johnson	Discussion with JLD re: preparation of class settlement agreement.	400.00 hr	0.20	0.20	80.00
07/15/2020	James Davidson	Discussion with JJ re settlement agreement.	450.00 hr	0.20	0.20	90.00

07/24/2020	Jesse Johnson	Correspondence with defense counsel re: selection of class administrator and preparation of settlement agreement materials	400.00 hr	0.20	0.20	80.00
07/27/2020	Jesse Johnson	Correspondence with defense counsel re: settlement materials	400.00 hr	0.20	0.20	80.00
07/27/2020	Jesse Johnson	Begin researching and preparing class settlement materials	400.00 hr	0.80	0.80	320.00
07/28/2020	Jesse Johnson	Phone call with defense counsel to discuss class settlement materials	400.00 hr	0.40	0.40	160.00
07/28/2020	Jesse Johnson	Continue researching and preparing drafts of class action settlement agreement, preliminary approval order, final approval order, and direct mail and website class notices	400.00 hr	5.20	5.20	2,080.00
07/29/2020	James Davidson	Review and comment on settlement agreement, draft preliminary and final approval orders, and website and longform notices.	450.00 hr	1.90	1.90	855.00
07/29/2020	Jesse Johnson	Revise latest draft of settlement agreement and exhibits, per JLD comments (.7); correspondence with defense counsel re: same (.1)	400.00 hr	0.80	0.80	320.00
08/05/2020	Jesse Johnson	Begin researching and preparing Plaintiff's unopposed preliminary approval motion, and counsel's supporting declaration	400.00 hr	4.80	4.80	1,920.00
08/06/2020	Jesse Johnson	Discussion with JLD re: preparation of class settlement materials and preliminary approval motion	400.00 hr	0.30	0.30	120.00
08/06/2020	James Davidson	Discussion with JJ re preliminary approval motion.	450.00 hr	0.30	0.30	135.00
08/07/2020	Jesse Johnson	Correspondence with client re: settlement agreement	400.00 hr	0.20	0.20	80.00
08/07/2020	Jesse Johnson	Continue researching and preparing Plaintiff's unopposed preliminary approval motion and counsel's supporting declaration	400.00 hr	3.60	3.60	1,440.00
08/07/2020	Jesse Johnson	Phone call with defense counsel to discuss revisions to class settlement agreement	400.00 hr	0.20	0.20	80.00
08/08/2020	Michael Greenwald	Review and revise motion for preliminary approval of class action settlement and declaration of JSJ in support.	450.00 hr	1.10	1.10	495.00
08/10/2020	James Davidson	Review correspondence from defense counsel re fee amount in class notice.	450.00 hr	0.10	0.10	45.00
08/10/2020	Jesse Johnson	Revise drafts of Plaintiff's preliminary approval motion and counsel's supporting declaration, per MLG comments	400.00 hr	0.50	0.50	200.00
08/10/2020	Jesse Johnson	Revise class settlement agreement materials, per edits from defense counsel and further strategy discussion with JLD	400.00 hr	0.50	0.50	200.00
08/10/2020	Jesse Johnson	Correspondence with defense counsel re: draft settlement materials and preliminary approval motion	400.00 hr	0.10	0.10	40.00
08/10/2020	James Davidson	Review draft fee demand to defense counsel and discuss same with JJ.	450.00 hr	0.40	0.40	180.00
08/10/2020	Jesse Johnson	Discuss fee petition strategy with JLD, and prepare correspondence to defense counsel re: fee negotiations	400.00 hr	0.40	0.40	160.00
08/10/2020	Jesse Johnson	Review 7th Circuit's decision in Pearson v. Target re: disgorgement of payments to objectors for individual settlements providing no benefits to class	0 hr	0.30	0	0.00
08/12/2020	Jesse Johnson	Correspondence with defense counsel re: settlement agreement and preliminary approval motion	400.00 hr	0.10	0.10	40.00
08/12/2020	Jesse Johnson	Finalize class settlement agreement and supporting exhibits	400.00 hr	0.40	0.40	160.00
08/12/2020	Jesse Johnson	Revise latest draft of Plaintiff's unopposed preliminary approval motion and counsel's supporting declaration, per edits from defense counsel	400.00 hr	0.40	0.40	160.00
08/12/2020	Jesse Johnson	Attention to fully executed settlement agreement (.2), and correspondence with defense counsel re: same (.1)	400.00 hr	0.30	0.30	120.00
08/12/2020	Jesse Johnson	Review and finalize Plaintiff's unopposed preliminary approval motion, counsel's supporting declaration, and proposed preliminary approval order (.6); correspondence with chambers with proposed order (.1)	400.00 hr	0.70	0.70	280.00
09/25/2020	Jesse Johnson	Correspondence with client with case update	400.00 hr	0.20	0.20	80.00
10/21/2020	Jesse Johnson	Discussion with JLD and MLG team re: preliminary approval next steps.	400.00 hr	0.30	0.30	120.00
10/21/2020	Michael Greenwald	Discussion with litigation team re potential notice of supplemental authority, and next steps.	0 hr	0.30	0	0.00

	10/21/2020	James Davidson	Discussion with litigation team re supplemental authority.	450.00 hr	0.30		135.00
	11/18/2020	James Davidson	Review order of preliminary approval.	450.00 hr	0.20	0.20	90.00
	11/18/2020	Jesse Johnson	Review preliminary approval order (.2); update class notice with relevant deadlines (.1); correspondence with administrator, defense counsel re: class notice campaign (.2)	400.00 hr	0.50	0.50	200.00
	11/18/2020	Jesse Johnson	Correspondence with client re: preliminary approval order	400.00 hr	0.10	0.10	40.00
	11/19/2020	Jesse Johnson	Review correspondence from administrator re: notice campaign	400.00 hr	0.10	0.10	40.00
	11/19/2020	Jesse Johnson	Review correspondence from defense counsel re: class list	400.00 hr	0.10	0.10	40.00
	11/19/2020	Jesse Johnson	Review sample postcard notice and administration specifications (.2); correspondence with administrator, defense counsel re: same (.1)	400.00 hr	0.30	0.30	120.00
	11/20/2020	Jesse Johnson	Review correspondence from defense counsel, and review preliminary approval order for discrepancies	400.00 hr	0.20	0.20	80.00
	11/20/2020	Jesse Johnson	Review order confirming date of final fairness hearing	400.00 hr	0.10	0.10	40.00
	11/20/2020	Jesse Johnson	Correspondence with defense counsel, administrator re: class notice campaign and CAFA notice (.3); review proposed CAFA notice (.1)	400.00 hr	0.40	0.40	160.00
	11/23/2020	Jesse Johnson	Review correspondence from defense counsel, administrator re: class notice and CAFA notice	400.00 hr	0.20	0.20	80.00
	11/23/2020	Jesse Johnson	Phone call with defense counsel to discuss class notice and fee petition negotiations (.2); following call, correspondence with defense counsel re: same (.2)	400.00 hr	0.40	0.40	160.00
	11/23/2020	Jesse Johnson	Attention to settlement website and long-form class notice with relevant dates	400.00 hr	0.40	0.40	160.00
	11/24/2020	James Davidson	Fee strategy with JJ.	450.00 hr	0.30	0.30	135.00
	11/24/2020	Jesse Johnson	Review correspondence from defense counsel re: Plaintiff's fee petition, and discuss same with JLD	400.00 hr	0.30	0.30	120.00
	11/30/2020	Jesse Johnson	Correspondence with defense counsel re: time records.	400.00 hr	0.10	0.10	40.00
	12/01/2020	James Davidson	Review time records for privilege and confidential concerns in advance of submission to defense counsel.	450.00 hr	0.50	0.50	225.00
	12/01/2020	Jesse Johnson	Review 11th Cir. decision in Medical & Chiropractic Clinic v. Oppenheim re: duties of class counsel to class representatives and absent class members	0 hr	0.30	0	0.00
	12/07/2020	Jesse Johnson	Correspondence with defense counsel re: fee petition	400.00 hr	0.10	0.10	40.00
	12/09/2020	Jesse Johnson	Review correspondence from defense counsel re: fee petition	400.00 hr	0.10	0.10	40.00
	12/10/2020	Jesse Johnson	Review update from administrator re: notice campaign	400.00 hr	0.10	0.10	40.00
	12/14/2020	Jesse Johnson	Begin researching and preparing Plaintiff's fee petition and counsel's supporting declaration	400.00 hr	2.20	2.20	880.00
	12/15/2020	Jesse Johnson	Fee petition strategy with JLD	400.00 hr	0.20	0.20	80.00
	12/15/2020	James Davidson	Review draft correspondence to defense counsel re fee negotiations.	450.00 hr	0.10	0.10	45.00
	12/15/2020	Jesse Johnson	Correspondence with defense counsel re: Plaintiff's fee petition	400.00 hr	0.10	0.10	40.00
	12/15/2020	James Davidson	Phone call with JJ re fee discussions.	450.00 hr	0.20	0.20	90.00
	12/15/2020	Jesse Johnson	Phone call with class member S. Taylor to answer questions about settlement	400.00 hr	0.20	0.20	80.00
	12/15/2020	Jesse Johnson	Phone call and correspondence with class member C. Hight	400.00 hr	0.20	0.20	80.00
	12/15/2020	Jesse Johnson	Continue researching and preparing Plaintiff's fee petition and counsel's supporting declaration	400.00 hr	2.80	2.80	1,120.00
	12/16/2020	Jesse Johnson	Correspondence with defense counsel re: negotiations over fee petition	400.00 hr	0.10	0.10	40.00
	12/16/2020	Jesse Johnson	Continue researching and preparing Plaintiff's fee and expense petition, and counsel's supporting declaration	400.00 hr	7.70	7.70	3,080.00
	12/17/2020	Jesse Johnson	Correspondence with defense counsel re: negotiations over Plaintiff's fee petition	400.00 hr	0.10	0.10	40.00
	12/17/2020	James Davidson	Review correspondence from defense counsel re fee negotiations.	450.00 hr	0.10	0.10	45.00

12/17/2020	James Davidson	Discussion with JJ re fee petition.	450.00 hr	0.20		90.00
12/17/2020	Jesse Johnson	Continue researching and preparing Plaintiff's fee petition, and counsel's supporting declaration	400.00 hr	3.20	3.20	1,280.00
12/17/2020	James Davidson	Review and comment on motion for an award of attorneys' fees and JJ declaration in support.	450.00 hr	1.00	1.00	450.00
12/17/2020	Jesse Johnson	Revise drafts of Plaintiff's fee petition and counsel's supporting declaration, per JLD edits and discussion with JLD re same.	400.00 hr	0.40	0.40	160.00
12/17/2020	Jesse Johnson	Continue researching and preparing latest draft of Plaintiff's fee petition, as well as proposed order on fee petition, and counsel's certification of consultation with defense counsel	400.00 hr	1.60	1.60	640.00
12/17/2020	Jesse Johnson	Phone call with class member D. Brown to answer questions about settlement	400.00 hr	0.10	0.10	40.00
12/17/2020	Jesse Johnson	Correspondence with class member C. Hildeen re: updated address	400.00 hr	0.20	0.20	80.00
12/18/2020	Jesse Johnson	Correspondence with class member C. Hildeen re: settlement checks	400.00 hr	0.10	0.10	40.00
12/18/2020	James Davidson	Review and comment on draft proposed order on motion for attorneys' fees.	450.00 hr	0.10	0.10	45.00
12/18/2020	Jesse Johnson	Review and finalize final drafts of Plaintiff's fee petition, counsel's supporting declaration and exhibit, counsel's certification of consultation, and proposed order on fees and expenses	400.00 hr	2.80	2.80	1,120.00
Total Labor For QuickStart				82.80	80.00	32,560.00
Total Expense For QuickStart					584.40	584.40
Total For QuickStart						33,144.40
Total Labor For Rodriguez, Daniel				82.80	80.00	32,560.00
Total Expense For Rodriguez, Daniel					584.40	584.40
Total For Rodriguez, Daniel						33,144.40
Grand Total Labor				82.80	80.00	32,560.00
Grand Total Expenses					584.40	584.40
Grand Total						33,144.40