

8. GDR undertook this case on a contingency basis and advanced all costs and litigation expenses.

9. Correspondingly, GDR has not received any payment to date for its work on behalf of Plaintiff and the settlement class.

Class Counsel

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

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

12. My practice at Robbins Geller focused on complex class actions, including securities fraud, corporate governance, and consumer fraud litigation.

13. At GDR, I have extensive experience litigating consumer protection class actions, including those brought under the Fair Debt Collection Practices Act (“FDCPA”), Florida Consumer Collection Practices Act (“FCCPA”), Consumer Leasing Act, Truth in Lending Act, and Telephone Consumer Protection Act.

14. James L. Davidson, a senior partner at the firm, assisted with this matter, primarily in reviewing and revising pleadings and engaging in litigation and settlement strategy.

15. Mr. Davidson, who is admitted to practice before this Court, graduated from the University of Florida in 2000 and the University of Florida Fredric G. Levin College of Law in 2003.

16. Mr. Davidson has been appointed class counsel in a host of consumer protection class actions nationwide. *See* <http://www.gdrlawfirm.com/James-Davidson>. He has more than 18 years of litigation experience, including 13 years litigating class actions.

17. GDR has been appointed class counsel in numerous class actions in Florida courts and in federal courts within the Eleventh Circuit. *E.g.*, *Denning v. Mankin Law Grp., P.A.*, No. 21-2822, 2022 WL 16956527 (M.D. Fla. Nov. 15, 2022); *Brown v. Fla. Power & Light Co.*, No. 50-2021-CA-011651 (15th Cir., Palm Beach Cnty., Fla. July 22, 2022); *Acuna v. Medical-Com. Audit, Inc.*, No. 21-81256, 2022 WL 404674 (S.D. Fla. Feb. 9, 2022); *Brockman v. Mankin Law Grp., P.A.*, No. 20-893, 2021 WL 911265 (M.D. Fla. Mar. 10, 2021); *Newman v. Eduardo Meloni, P.A.*, No. 20-60027, 2020 WL 3052801 (S.D. Fla. June 5, 2020); *Claxton v. Alliance CAS, LLC*, No. 19-61002, 2020 WL 2759826 (S.D. Fla. May 27, 2020); *Sullivan v. Marinosci Law Grp., P.C., P.A.*, No. 18-81368, 2019 WL 3940256 (S.D. Fla. Aug. 19, 2019); *Williams v. Bluestem Brands, Inc.*, No. 17-1971, 2019 WL 1450090 (M.D. Fla. Apr. 2, 2019); *Dickens v. GC Servs. Ltd. P'ship*, 336 F. Supp. 3d 1369 (M.D. Fla. 2018); *Reyes v. BCA Fin. Servs., Inc.*, No. 16-24077, 2018 WL 3145807 (S.D. Fla. June 26, 2018), *class decertified by request*, *Reyes v. BCA Fin. Servs., Inc.* (S.D. Fla. March 18, 2020); *Kagno v. Bush Ross, P.A.*, No. 17-1468, 2017 WL 6026494 (M.D. Fla. Dec. 4, 2017); *Johnson v. NPAS Sols., LLC*, No. 17-80393, 2017 WL 6060778 (S.D. Fla. Dec. 4, 2017); *James v. JPMorgan Chase Bank, N.A.*, No. 15-2424, 2017 WL 2472499 (M.D. Fla. June 5, 2017); *Johnston v. Kass Shuler, P.A.*, No. 16-3390, 2017 WL 1231070 (M.D. Fla. Mar. 29, 2017); *Cross v. Wells Fargo Bank, N.A.*, No. 15-1270, 2016 WL 5109533 (N.D. Ga. Sept. 13, 2016); *Roundtree v. Bush Ross, P.A.*, No. 14-357, 2016 WL 360721 (M.D. Fla. Jan. 28, 2016); *Gonzalez v. Dynamic Recovery Sols., LLC*, Nos. 14-24502, 14-20933, 2015 WL 738329 (S.D. Fla. Feb. 23, 2015).

18. Moreover, courts throughout the country have appointed GDR class counsel in consumer protection matters. *E.g.*, *Head v. Citibank, N.A.*, 340 F.R.D. 145 (D. Ariz. 2022); *Wesley v. Snap Fin. LLC*, 339 F.R.D. 277 (D. Utah 2021); *Isakova v. Klein, Daday, Aretos &*

O'Donoghue LLC, No. 19-5221 (E.D.N.Y. May 26, 2021); *Reeves v. Patenaude & Felix, A.P.C.*, No. 20-11034, 2021 WL 1186145 (E.D. Mich. Mar. 26, 2021); *Jewell v. HSN, Inc.*, No. 19-247, 2020 WL 4904427 (W.D. Wis. Aug. 19, 2020); *Danger v. Nextep Funding, LLC*, No. 18-567, 2020 WL 4034822 (D. Minn. July 17, 2020); *Claxton v. Alliance CAS, LLC*, No. 19-61002, 2020 WL 2759826 (S.D. Fla. May 27, 2020); *Riddle v. Atkins & Ogle Law Offices, LC*, No. 19-249, 2020 WL 1303939 (S.D. W. Va. Feb. 26, 2020); *Taylor v. TimePayment Corp.*, No. 18-378, 2020 WL 906319 (E.D. Va. Feb. 24, 2020); *Sullivan v. Marinosci Law Grp., P.C., P.A.*, No. 18-81368, 2019 WL 6709575 (S.D. Fla. Nov. 22, 2019); *Sheean v. Convergent Outsourcing, Inc.*, No. 18-11532, 2019 WL 6039921 (E.D. Mich. Nov. 14, 2019); *Aikens v. Malcolm Cisneros*, No. 17-2462, 2019 WL 3491928 (C.D. Cal. July 31, 2019); *Hoffman v. Law Office of Fradkin & Weber, P.A.*, No. 19-163, 2019 WL 2723581 (D. Md. July 1, 2019); *Spencer v. #1 A LifeSafer of Ariz., LLC*, No. 18-2225, 2019 WL 1034451 (D. Ariz. Mar. 4, 2019); *Knapper v. Cox Commc 'ns, Inc.*, 329 F.R.D. 238 (D. Ariz. 2019); *Smith v. Cohn, Goldberg & Deutsch, LLC*, No. 17-2291, ECF No. 33 (D. Md. July 19, 2018); *Beck v. Thomason Law Firm, LLC*, No. 16-570, 2017 WL 3267751 (D.N.M. July 27, 2017); *Ryan v. DeVille Asset Mgmt., Ltd.*, No. 15-1067, 2016 WL 7165751 (D. Or. Dec. 7, 2016); *Jallo v. Resurgent Capital Servs., L.P.*, No. 14-449, 2016 WL 6610322 (E.D. Tex. Nov. 8, 2016); *Rhodes v. Nat'l Collection Sys., Inc.*, 317 F.R.D. 579 (D. Colo. 2016); *Gonzalez v. Germaine Law Office PLC*, No. 15-1427, 2016 WL 5844605 (D. Ariz. Oct. 3, 2016); *McCurdy v. Prof'l Credit Serv.*, No. 15-1498, 2016 WL 5853721 (D. Or. Oct. 3, 2016); *Marcoux v. Susan J. Szwed, P.A.*, No. 15-93, 2016 WL 5720713 (D. Me. Oct. 3, 2016); *Cobb v. Edward F. Bukaty, III, PLC*, No. 15-335, 2016 WL 4925165 (M.D. La. Sept. 14, 2016); *Schell v. Frederick J. Hanna & Assocs., P.C.*, No. 15-418, 2016 WL 3654472 (S.D. Ohio July 8, 2016); *Chamberlin v. Mullooly, Jeffrey, Rooney & Flynn, LLP*, No. 15-2361, ECF No. 44

(D.N.J. June 2, 2016); *Schuchardt v. Law Office of Rory W. Clark*, 314 F.R.D. 673 (N.D. Cal. 2016); *Durham v. Schlee & Stillman, LLC*, No. 15-1652, ECF No. 16 (D. Md. May 31, 2016); *Whitford v. Weber & Olcese, P.L.C.*, No. 15-400, 2016 WL 122393 (W.D. Mich. Jan. 11, 2016); *Garza v. Mitchell Rubenstein & Assocs., P.C.*, No. 15-1572, 2015 WL 9594286 (D. Md. Dec. 28, 2015); *Baldwin v. Glasser & Glasser, P.L.C.*, No. 15-490, 2015 WL 77669207 (E.D. Va. Dec. 1, 2015); *McWilliams v. Advanced Recovery Sys., Inc.*, 310 F.R.D. 337 (S.D. Miss. 2015); *Rhodes v. Olson Assocs., P.C. d/b/a Olson Shaner*, 83 F. Supp. 3d 1096 (D. Colo. 2015); *Ritchie v. Van Ru Credit Corp.*, No. 12-1714, 2014 WL 3955268 (D. Ariz. Aug. 13, 2014).

19. GDR has been appointed class counsel in actions recovering more than \$120 million in total for consumers nationwide.

20. During this time, multiple courts have commented on GDR's useful knowledge and experience in connection with class action litigation.

21. For example, in *Schwyhart v. AmSher Collection Servs., Inc.*, Judge John E. Ott, Chief Magistrate Judge of the Northern District of Alabama, stated upon granting final approval of a Telephone Consumer Protection Act ("TCPA") settlement in which he appointed GDR as class counsel:

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

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

22. In *Ritchie v. Van Ru Credit Corp.*, Judge Stephen McNamee, Senior U.S. District Court Judge for the District of Arizona, stated upon granting final approval of the TCPA class settlement at issue:

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

No. 12-1714 (D. Ariz. July 21, 2014).

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

More important, frankly, is the skill with which plaintiff's counsel litigated this matter. On that point there is no disagreement. Defense counsel concedes that her opponent—a specialist in the field who has been class counsel in dozens of these matters across the country—'is to be commended for his work' for the class, 'was professional at all times' . . . , and used his 'excellent negotiation skills' to achieve a settlement fund greater than that required by the law.

The undersigned concurs . . . Counsel's level of experience in handling cases brought under the FDCPA, other consumer protection statutes, and class actions generally cannot be overstated.

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

24. Similarly, in *Roundtree v. Bush Ross, P.A.*, Judge James Whittemore of the Middle District of Florida wrote in certifying three separate FDCPA classes and appointing GDR class counsel: "Greenwald [Davidson Radbil PLLC] has been appointed as class counsel in a number of actions and thus provides great experience in representing plaintiffs in consumer class actions." 304 F.R.D. 644, 661 (M.D. Fla. Feb. 18, 2015).

25. In *Donnelly v. EquityExperts.org, LLC*, Judge Terrence G. Berg of the Eastern District of Michigan stated upon approving an FDCPA class action settlement and appointing GDR as class counsel:

[W]e see a fair number of FDCPA cases that are not necessarily at this level of sophistication or seriousness but I think that the—both sides appear to have really approached this with a positive attitude in trying to reach a settlement that from what I can see, appears to be the right thing to do in a reasonable and appropriate way.

No. 13-10017 (E.D. Mich. Jan. 14, 2015).

26. In *Riddle v. Atkins & Ogle Law Offices, LC*, Judge Robert C. Chambers of the Southern District of West Virginia noted in approving an FDCPA class settlement:

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

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

27. And last year, Judge Mary Scriven of the Middle District of Florida remarked in connection with approval of an FDCPA class settlement and resulting attorneys' fees award: "GDR is an experienced firm that has successfully litigated many complex consumer class actions. Because of its experience, GDR has been appointed class counsel in many class actions throughout the country, including several in this district." *Brockman v. Mankin Law Grp., P.A.*, No. 20-893, 2021 WL 913082 (M.D. Fla. Mar. 10, 2021).

28. Additional information about GDR is available at www.gdrllawfirm.com.

GDR's Reasonable Attorneys' Fees

29. The attorneys' fees requested here are fair and reasonable in light of this certified class action benefiting hundreds of Florida consumers.

30. For over a year now, GDR's attorneys have devoted significant time and resources to developing this case and obtaining such great results for class members. Their effort includes: (a) conducting an investigation into the underlying facts concerning the FDCPA and FCCPA claims at hand; (b) researching and preparing a federal court class action complaint; (c) researching Cianfrone, Nikoloff, Grant & Greenberg, P.A.'s ("Defendant") motion to dismiss for lack of jurisdiction and conferring with defense counsel regarding re-filing the action in state court; (d) preparing the operative class action complaint before this Court; (e) preparing the

parties' agreed case management order and accompanying correspondence to the Court; (f) preparing Plaintiff's first sets of interrogatories, requests for production, and requests for admission to Defendant; (g) preparing Plaintiff's objections and responses to Defendant's first sets of interrogatories and requests for production directed to Plaintiff; (h) preparing a Rule 1.310 notice of deposition to Defendant with accompanying testimony topics; (i) researching and preparing Plaintiff's class settlement demand, and engaging in follow-up negotiations with Defendant; (j) preparing, negotiating, and revising the parties' written class settlement agreement and accompanying exhibits, including the proposed class notice; (k) obtaining bids for class settlement administration services and conferring with Defendant regarding the same; (l) preparing Plaintiff's motion for preliminary approval of the class settlement and accompanying proposed preliminary approval order; (m) coordinating with Defendant and the administrator to effectuate the Court-approved notice plan; (n) responding to class member inquiries; (o) researching and drafting Plaintiff's fee motion and the instant declaration in support; and (p) conferring repeatedly with Plaintiff and defense counsel throughout the entirety of the litigation.

31. GDR's diligent efforts in (1) developing the class claims, (2) pivoting to state court in the face of Defendant's jurisdictional challenge in federal court, (3) conducting discovery to identify class members as well as their potential damages, and (4) successfully negotiating the class settlement presented—all while navigating the risks of contingent class action litigation and ultimately bringing this matter to an excellent resolution for all class members—is deserving of the reasonable fee and expense award requested.

32. To be sure, GDR litigated this case efficiently and effectively in the best interests of all class members, having secured substantial benefits above and beyond the applicable statutory damages limits under the FDCA and FDCPA.

33. In doing so, as of the date of this declaration, GDR's attorneys have spent a total of 170.6 hours litigating this case, which includes my spending a total of 150 hours to bring Plaintiff's and the classes' claims to this point, and Mr. Davidson contributing an additional 20.6 hours in support.¹

34. The time included herein is evidenced by my firm's electronically stored time records, which are entered contemporaneously with the respective task to which they relate. These time records, which accurately reflect the work performed, are attached as Exhibit 1.

35. Additionally, I conservatively estimate that this case will require 15 more hours of my time to complete, which will be spent researching and preparing Plaintiff's motion for final approval of the settlement; preparing for and attending the final fairness hearing set for June 29, 2023; overseeing the settlement distributions; addressing any class member objections or concerns; and continuing to confer with class members, Defendant, and Class-Settlement.com regarding the settlement.

36. While prosecuting Plaintiff's and the classes' claims, and in line with GDR's contingent fee agreement with Plaintiff, I billed at a rate of \$450 per hour and Mr. Davidson billed at a rate of \$500 per hour.

37. Multiplying the hours incurred by each GDR attorney's applicable hourly rate produces a current lodestar of \$77,800; including my additional estimated time necessary to conclude this matter yields a total estimated lodestar of \$84,550.

38. I respectfully submit that the requested fee and expense award of \$44,000, which is inclusive of costs and expenses (explained below) and represents a discount of over 47% as

¹ Three other GDR attorneys also contributed work here, but in an exercise of billing discretion, GDR has zeroed out their time as non-billable and thus not included it in GDR's lodestar tally.

compared to GDR's anticipated lodestar, is eminently reasonable for this certified class action, particularly in light of the excellent recoveries obtained for Plaintiff and the class members.

Reimbursable Costs and Litigation Expenses

39. Subsumed within Plaintiff's \$44,000 fee and expense request is reimbursement for costs and litigation expenses reasonably incurred in connection with the prosecution of Plaintiff's and the classes' claims.

40. Such costs and expenses are reflected in the books and records maintained by class counsel, which are an accurate recording of those incurred; to date, GDR has incurred reimbursable costs and expenses in the total amount of \$891.45.

41. These costs and expenses include the filing fees for the complaints (\$826.35), fees for issuance of a summons (\$10.35), and the costs of service of the complaint and summons on Defendant (\$54.75).

42. Further, GDR has incurred additional reimbursable expenses, such as for photocopies, telephone services, and computerized legal research, which are not separately itemized herein and for which class counsel does not seek separate reimbursement.

43. That GDR does not seek reimbursement for these various other expenses lends further support to the reasonableness of Plaintiff's fee and expense request.

44. As set out above and in Plaintiff's accompanying motion, I respectfully request that this Court grant Plaintiff's motion for approval of an award of attorneys' fees, costs, and litigation expenses in the total amount of \$44,000.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 26, 2023

/s/ Jesse S. Johnson
Jesse S. Johnson

Exhibit 1

Greenwald Davidson Radbil PLLC - User Summary

Date Start: 1/1/2021 | Date End: 4/26/2023 | Clients: Gathen, Heidi | Projects: Cianfrone, Nikiloff, Grant & Greenberg, P.A. | Users: James Davidson, Jesse Johnson | Account Managers: All

Date	Client	Project	Description	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
James Davidson							
08/18/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence then exchange of correspondence with JJ re potential claims.	500.00 hr	0.10	0.10	50.00
09/01/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re case status.	500.00 hr	0.10	0.10	50.00
10/25/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with JJ re complaint strategy.	500.00 hr	0.30	0.30	150.00
10/27/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re case status.	500.00 hr	0.10	0.10	50.00
11/09/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and comment on draft class action complaint.	500.00 hr	0.90	0.90	450.00
11/12/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review judge assignment.	500.00 hr	0.10	0.10	50.00
11/16/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review NOTICE of Local Rule 1.07(c) and Local Rule 3.02(a)(2).	500.00 hr	0.10	0.10	50.00
11/17/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review notice of related actions and review certificate of interested persons.	500.00 hr	0.10	0.10	50.00
11/30/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review Unopposed MOTION for Extension of Time to File Response/Reply to Plaintiff's Complaint by All Defendants.	500.00 hr	0.10	0.10	50.00
12/01/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re case status.	500.00 hr	0.10	0.10	50.00
12/06/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review ORDER granting [10]--motion for extension of time to respond.	500.00 hr	0.10	0.10	50.00
12/06/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review Defendant's CERTIFICATE of interested persons and corporate disclosure statement by Cianfrone, Nikiloff, Grant & Greenberg, P.A.	500.00 hr	0.10	0.10	50.00
12/06/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review NOTICE of a related action per Local Rule 1.07(c) by Cianfrone, Nikiloff, Grant & Greenberg, P.A.	500.00 hr	0.10	0.10	50.00
12/21/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review meet and confer email from defense counsel re motion to dismiss.	500.00 hr	0.10	0.10	50.00
12/23/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Initial review of Defendant's motion to dismiss.	500.00 hr	0.20	0.20	100.00
01/07/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review draft stip. of dismissal.	500.00 hr	0.10	0.10	50.00

01/07/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence from S. Smith re dismissal of complaint.	500.00 hr	0.10	0.10	50.00
01/07/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and revise proposed response to defense counsel re dismissal of claims and threat of sanctions.	500.00 hr	0.60	0.60	300.00
01/07/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Exchange of correspondence with JJ re correspondence with defense counsel re dismissing complaint.	500.00 hr	0.10	0.10	50.00
01/10/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review draft notice of dismissal.	500.00 hr	0.10	0.10	50.00
01/12/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and comment on draft state court class action complaint.	500.00 hr	1.30	1.30	650.00
01/13/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with JJ re draft state court complaint.	500.00 hr	0.10	0.10	50.00
01/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with JJ re adding property management company as defendant.	500.00 hr	0.10	0.10	50.00
01/19/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re case status.	500.00 hr	0.10	0.10	50.00
01/26/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re case status.	500.00 hr	0.10	0.10	50.00
03/17/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review Defendant's Answer and Affirmative Defenses.	500.00 hr	0.20	0.20	100.00
03/30/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re case status.	500.00 hr	0.10	0.10	50.00
03/30/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review Deborah Laufer v. Arpan LLC (11th Cir. Mar. 29, 2022) (Article III stranding opinion).	0 hr	0.30	0	0.00
04/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and comment on Plaintiff's initial discovery requests to Defendant.	500.00 hr	0.50	0.50	250.00
04/19/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence from S. Smith re mediation.	500.00 hr	0.10	0.10	50.00
06/01/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review Butela v. Midland Credit Management, No. 2:20-cv-1612, 2022 WL 1237047 (W.D. Penn. April 27, 2022) (certifying FDCPA class and denying dismissal on Article III grounds).	0 hr	0.20	0	0.00
06/01/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re case status.	500.00 hr	0.10	0.10	50.00
06/09/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with JJ re draft of Plaintiff's discovery response.	500.00 hr	0.20	0.20	100.00
06/13/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and comment on Plaintiff's responses and objections to Defendant's initial written discovery to Plaintiff (.8); then phone call with JJ re same (.1).	500.00 hr	0.90	0.90	450.00
06/30/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence from JJ re Defendant's insurance situation.	500.00 hr	0.10	0.10	50.00

07/11/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with JJ re settlement demand.	500.00 hr	0.20	0.20	100.00
07/11/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and revise draft correspondence to defense counsel re settlement.	500.00 hr	0.10	0.10	50.00
07/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and comment on draft settlement demand and exchange of correspondence with JJ re same (.3); then phone call with JJ re settlement demand (.5).	500.00 hr	0.80	0.80	400.00
07/19/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review Southam v. Red Wing Shoe Company, No. 4D21-3338 (Fla. 4th DCA July 13, 2022) (addressing standing to sue for statutory damages).	0 hr	0.20	0	0.00
07/26/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence from defense counsel re settlement.	500.00 hr	0.10	0.10	50.00
08/02/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review Cooper v. Retrieval-Masters Creditors Bureau, Inc., No. 18-2358, 2022 WL 3009480 (7th Cir. July 29, 2022) (fees in an FDCPA case in the face of an early settlement offer); Cooper v. Retrieval-Masters Creditors Bureau, Inc., No. 18-2983, 2022 WL 3009807 (7th Cir. July 29, 2022) (analysis of Rule 11 in FDCPA case).	0 hr	0.40	0	0.00
08/15/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review Defendant's notice of unavailability.	500.00 hr	0.10	0.10	50.00
08/17/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review settlement correspondence from defense counsel.	500.00 hr	0.10	0.10	50.00
08/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with JJ re settlement counteroffer.	500.00 hr	0.80	0.80	400.00
08/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and comment on most recent settlement counter offer letter.	500.00 hr	0.50	0.50	250.00
08/29/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with JJ re settlement discussions.	500.00 hr	0.30	0.30	150.00
08/31/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re case status.	500.00 hr	0.10	0.10	50.00
09/07/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review admin. estimate from Continental DataLogix.	500.00 hr	0.10	0.10	50.00
09/07/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re case status.	500.00 hr	0.10	0.10	50.00
09/20/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re case status.	500.00 hr	0.10	0.10	50.00
09/21/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence from defense counsel re settlement.	500.00 hr	0.10	0.10	50.00
09/22/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Exchange of correspondence with JJ re settlement.	500.00 hr	0.10	0.10	50.00
09/22/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with JJ re settlement negotiations.	500.00 hr	0.30	0.30	150.00
09/26/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence to defense counsel re attorney's fess.	500.00 hr	0.20	0.20	100.00

09/26/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with JJ re settlement strategy.	500.00 hr	0.20	0.20	100.00
09/28/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Exchange of correspondence with JJ re fee negotiation.	500.00 hr	0.10	0.10	50.00
10/03/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with JJ re settlement.	500.00 hr	0.20	0.20	100.00
10/03/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and comment on draft correspondence to defense counsel re fee negotiations.	500.00 hr	0.10	0.10	50.00
10/10/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence from S. Smith re discovery issues.	500.00 hr	0.10	0.10	50.00
10/10/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and revise draft correspondence to S. Smith re settlement discussions.	500.00 hr	0.20	0.20	100.00
10/13/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with JJ re settlement strategy.	500.00 hr	0.30	0.30	150.00
10/20/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence from defense counsel re fee negotiations.	500.00 hr	0.10	0.10	50.00
10/25/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with JJ re settlement.	500.00 hr	0.10	0.10	50.00
10/26/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re case status.	500.00 hr	0.10	0.10	50.00
11/10/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with JJ regarding how to structure settlement payments.	500.00 hr	1.00	1.00	500.00
11/15/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with JJ re settlement.	500.00 hr	0.10	0.10	50.00
11/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and comment on draft settlement agreement, preliminary approval order, final approval order and class notice.	500.00 hr	1.10	1.10	550.00
11/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with JJ re settlement strategy.	500.00 hr	0.20	0.20	100.00
11/30/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re case status.	500.00 hr	0.10	0.10	50.00
12/05/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with JJ re settlement agreement release language.	500.00 hr	0.10	0.10	50.00
12/06/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with JJ re motion for preliminary approval.	500.00 hr	0.10	0.10	50.00
12/06/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and comment on draft motion for preliminary approval and declaration of JJ in support.	500.00 hr	0.90	0.90	450.00
12/07/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re case status.	500.00 hr	0.10	0.10	50.00

12/21/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re case status.	500.00 hr	0.10	0.10	50.00
02/15/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re case status.	500.00 hr	0.10	0.10	50.00
03/14/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Case strategy with JJ.	500.00 hr	0.10	0.10	50.00
03/27/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review preliminary approval order.	500.00 hr	0.10	0.10	50.00
04/05/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re case status.	500.00 hr	0.30	0.30	150.00
04/13/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with JJ re class notice.	500.00 hr	0.30	0.30	150.00
04/14/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence from S. Smith re class list.	500.00 hr	0.10	0.10	50.00
04/14/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review updated long form notice.	500.00 hr	0.20	0.20	100.00
04/19/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Exchange of correspondence with JJ re fee petition.	500.00 hr	0.10	0.10	50.00
04/21/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review billing records for privilege and confidentiality concerns in advance of submission to court and then prepare correspondence to JJ re same.	500.00 hr	1.20	1.20	600.00
04/25/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and comment on draft fee petition and draft JSJ declaration in support.	500.00 hr	1.20	1.20	600.00
Total Labor For James Davidson					21.70	20.60	10,300.00
Total Expense For James Davidson						0.00	0.00
Total For James Davidson							10,300.00

Jesse Johnson

08/04/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with potential client re: possible claims	450.00 hr	0.10	0.10	45.00
08/18/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence and letter from potential client, and discuss possible claims with JLD	450.00 hr	0.30	0.30	135.00
08/27/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with potential client re: possible claims	450.00 hr	0.30	0.30	135.00
08/30/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with potential client	450.00 hr	0.10	0.10	45.00
09/01/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence and phone call with client re: retainer agreement and additional correspondence from Defendant	450.00 hr	0.30	0.30	135.00
09/01/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: case strategy.	450.00 hr	0.10	0.10	45.00

09/03/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: possible claims	450.00 hr	0.10	0.10	45.00
09/09/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence and documents from potential client (.4); phone call with client (.3)	450.00 hr	0.70	0.70	315.00
09/15/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare retainer agreement and statement of client's rights	450.00 hr	0.30	0.30	135.00
09/21/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client re: draft complaint	450.00 hr	0.10	0.10	45.00
09/27/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: retainer agreement	450.00 hr	0.10	0.10	45.00
10/11/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare draft class action complaint	450.00 hr	0.60	0.60	270.00
10/12/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare draft complaint	450.00 hr	0.40	0.40	180.00
10/13/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Continue researching and preparing class action complaint	450.00 hr	0.50	0.50	225.00
10/19/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client re: draft complaint	450.00 hr	0.10	0.10	45.00
10/25/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discuss complaint strategy with JLD	450.00 hr	0.30	0.30	135.00
10/25/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare draft class action complaint	450.00 hr	1.70	1.70	765.00
10/26/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare draft class action complaint	450.00 hr	3.20	3.20	1,440.00
10/27/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: draft complaint	450.00 hr	0.10	0.10	45.00
10/27/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Continue research and preparing draft class action complaint	450.00 hr	1.40	1.40	630.00
11/03/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare draft class action complaint	450.00 hr	1.60	1.60	720.00
11/09/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Revise latest draft of complaint, per JLD edits and comments	450.00 hr	0.40	0.40	180.00
11/09/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client to discuss draft complaint	450.00 hr	0.40	0.40	180.00
11/09/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and revise latest draft of complaint per discussion with client (.9); correspondence with client with revised draft complaint (.1)	450.00 hr	1.00	1.00	450.00
11/10/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Complaint filing fee	402.00 ea	1.00	402.00	402.00

11/10/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and finalize final draft of class action complaint and all supporting documents	450.00 hr	0.90	0.90	405.00
11/10/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: filing of complaint	450.00 hr	0.10	0.10	45.00
11/11/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: service of complaint and possible amendment to complaint	450.00 hr	0.10	0.10	45.00
11/12/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review judicial assignment and issuance of summons	450.00 hr	0.10	0.10	45.00
11/16/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review order requiring certificate of interested persons	450.00 hr	0.10	0.10	45.00
11/16/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Attention to service of process on Defendant	450.00 hr	0.20	0.20	90.00
11/17/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and finalize for filing Plaintiff's certificated of interested persons and notice of related actions	450.00 hr	0.30	0.30	135.00
11/29/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Service of complaint and summons on Defendant	54.75 ea	1.00	54.75	54.75
11/29/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: extension of time to respond to complaint	450.00 hr	0.20	0.20	90.00
11/29/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Finalize return of service and attention to calendar for Defendant's response deadline	450.00 hr	0.20	0.20	90.00
11/29/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review notices of appearance by J. Vine and S. Smith for Defendant	450.00 hr	0.10	0.10	45.00
11/30/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review Defendant's motion for extension of time to respond to complaint	450.00 hr	0.10	0.10	45.00
12/01/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: Defendant's request for extension of time to respond to complaint	450.00 hr	0.10	0.10	45.00
12/03/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review Defendant's certificate of interested persons and notice of related actions	450.00 hr	0.20	0.20	90.00
12/03/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review order granting extension of time to respond to complaint, and attention to calendar re: same	450.00 hr	0.10	0.10	45.00
12/21/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: meet and confer for motion to dismiss	450.00 hr	0.20	0.20	90.00
12/22/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review complaint in prep for meet and confer with defense counsel (.3); phone call with defense counsel to confer for impending motion to dismiss (.5)	450.00 hr	0.80	0.80	360.00
12/27/2021	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review Defendant's motion to dismiss and begin researching and preparing Plaintiff's opposition brief	450.00 hr	2.40	2.40	1,080.00
01/03/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare Plaintiff's opposition to motion to dismiss	450.00 hr	1.40	1.40	630.00

01/04/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and notate Defendant's motion to dismiss; strategy for possible amended complaint; research and prepare Plaintiff's opposition to motion dismiss	450.00 hr	4.10	4.10	1,845.00
01/05/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: strategy for opposing Defendant's motion to dismiss, potential dismissal and re-filing in state court	450.00 hr	0.20	0.20	90.00
01/06/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with defense counsel to discuss potential voluntary dismissal (.2); correspondence with defense counsel (.1)	450.00 hr	0.30	0.30	135.00
01/06/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Begin researching and preparing state court complaint	450.00 hr	1.20	1.20	540.00
01/07/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client to discuss strategy for re-filing in state court	450.00 hr	0.20	0.20	90.00
01/07/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Prepare stipulation of dismissal (.1); correspondence with defense counsel re: same (.1)	450.00 hr	0.20	0.20	90.00
01/07/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence from defense counsel re: opposition to stipulated dismissal (.1); then research and prepare response re: dismissal for lack of subject matter jurisdiction and potentially re-filing in state court (.6); discuss strategy for response with JLD (.2)	450.00 hr	0.90	0.90	405.00
01/10/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Prepare notice of voluntary dismissal	450.00 hr	0.10	0.10	45.00
01/11/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Finalize notice of voluntary dismissal in federal court	450.00 hr	0.10	0.10	45.00
01/11/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discuss state court complaint strategy with JLD	450.00 hr	0.20	0.20	90.00
01/11/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and revise class action complaint for filing in state court, including revising pleadings based upon Defendant's motion in federal case, and researching Florida law on actual knowledge requirement for FCCPA section 559.72(9) claims and federal law on companion FDCPA section 1692e and 1692f claims	450.00 hr	5.70	5.70	2,565.00
01/12/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Continue researching and preparing state court class action complaint	450.00 hr	1.70	1.70	765.00
01/12/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with JLD re: complaint strategy	450.00 hr	0.10	0.10	45.00
01/13/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review order of dismissal without prejudice	450.00 hr	0.10	0.10	45.00
01/13/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Revise latest draft of state court class action complaint, per JLD edits and comments (1.3); correspondence with client re: complaint (.1)	450.00 hr	1.40	1.40	630.00
01/14/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: draft complaint	450.00 hr	0.20	0.20	90.00
01/14/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and revise latest draft of state court complaint	450.00 hr	0.70	0.70	315.00
01/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client with case update	450.00 hr	0.20	0.20	90.00

01/19/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: preparation of state court class complaint	450.00 hr	0.10	0.10	45.00
01/19/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and finalize state court class action complaint and supporting documents	450.00 hr	2.70	2.70	1,215.00
01/19/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: state court filing	450.00 hr	0.10	0.10	45.00
01/20/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	State court complaint filing fee	424.35 ea	1.00	424.35	424.35
01/26/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: refiling in state court	450.00 hr	0.10	0.10	45.00
01/27/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client	450.00 hr	0.10	0.10	45.00
02/01/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Summons request in state court	10.35 ea	1.00	10.35	10.35
02/01/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Finalize request for issuance of summons	450.00 hr	0.30	0.30	135.00
02/10/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: service of complaint and summons	450.00 hr	0.20	0.20	90.00
02/11/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence from defense counsel re: service of complaint	450.00 hr	0.10	0.10	45.00
03/01/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: extension of time to respond to complaint (.1), and attention to calendar re: same (.1)	450.00 hr	0.20	0.20	90.00
03/03/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: impending response to complaint	450.00 hr	0.10	0.10	45.00
03/08/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client with case update	450.00 hr	0.10	0.10	45.00
03/11/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client re: case update	450.00 hr	0.10	0.10	45.00
03/17/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review Defendant's answer and affirmative defenses	450.00 hr	0.20	0.20	90.00
03/28/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client re: Defendant's answer and affirmative defenses	450.00 hr	0.10	0.10	45.00
03/30/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: preparation of written discovery to Defendant	450.00 hr	0.10	0.10	45.00
04/07/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review Defendant's written discovery requests and prepare Plaintiff's written responses and objections	450.00 hr	1.30	1.30	585.00
04/08/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare Plaintiff's first sets of interrogatories, requests for production, and requests for admission to Defendant	450.00 hr	0.70	0.70	315.00

04/11/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare Plaintiff's written discovery requests to Defendant	450.00 hr	1.10	1.10	495.00
04/11/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare Plaintiff's responses to Defendant's written discovery requests	450.00 hr	0.50	0.50	225.00
04/12/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare Plaintiff's objections and responses to Defendant's written discovery requests	450.00 hr	0.50	0.50	225.00
04/12/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare Plaintiff's first sets of written discovery to Defendant	450.00 hr	0.40	0.40	180.00
04/15/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare Plaintiff's first sets of interrogatories, requests for production, and requests for admission to Defendant	450.00 hr	2.80	2.80	1,260.00
04/19/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Revise and finalize Plaintiff's initial written discovery requests to Defendant, per JLD edits (.4); correspondence to defense counsel serving same (.1); prepare and finalize notice of serving interrogatories on Defendant (.2)	450.00 hr	0.70	0.70	315.00
04/19/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: possible mediation	450.00 hr	0.20	0.20	90.00
04/20/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: potential mediation and class settlement framework	450.00 hr	0.30	0.30	135.00
05/05/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare Plaintiff's objections and responses to written discovery requests	450.00 hr	1.20	1.20	540.00
05/09/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: potential early resolution	450.00 hr	0.10	0.10	45.00
05/16/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Continue researching and preparing Plaintiff's written discovery responses and objections	450.00 hr	0.80	0.80	360.00
05/17/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare Plaintiff's objections and responses to written discovery requests from Defendant	450.00 hr	0.70	0.70	315.00
05/19/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: extension of time for Defendant's written discovery responses, Defendant's gathering of class-related data for purposes of settlement discussion (.1); attention to calendar for deadline for Defendant's discovery responses (.1)	450.00 hr	0.20	0.20	90.00
05/24/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare Plaintiff's objections and responses to Defendant's written discovery requests	450.00 hr	1.90	1.90	855.00
05/24/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review 11th Circuit's recent decision in Daniels v. Select Portfolio Servicing sustaining FDCPA and FCCPA claims	0 hr	0.30	0	0.00
05/25/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: extension of time for Plaintiff's written discovery responses (.1); attention to calendar for new deadline (.1)	450.00 hr	0.20	0.20	90.00
05/25/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Continue researching and preparing Plaintiff's responses and objections to written discovery	450.00 hr	3.30	3.30	1,485.00
05/26/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review mandatory covid-19 case management order, and attention to calendar for relevant case deadlines	450.00 hr	0.30	0.30	135.00
06/01/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: ongoing discovery	450.00 hr	0.10	0.10	45.00

06/02/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: Defendant's written discovery requests	450.00 hr	0.10	0.10	45.00
06/03/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client re: written discovery requests from Defendant	450.00 hr	0.20	0.20	90.00
06/03/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: possible resolution	450.00 hr	0.10	0.10	45.00
06/03/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Continue preparing Plaintiff's objections and responses to written discovery	450.00 hr	1.80	1.80	810.00
06/06/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare Plaintiff's written discovery objections and responses	450.00 hr	1.70	1.70	765.00
06/07/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Continue researching and preparing responses and objections to written discovery requests	450.00 hr	2.80	2.80	1,260.00
06/08/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Continue researching and preparing Plaintiff's objections and responses to written discovery requests	450.00 hr	4.60	4.60	2,070.00
06/09/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client to discuss written discovery responses (1.1); following call, correspondence with client re: same (.1)	450.00 hr	1.20	1.20	540.00
06/09/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with JLD to discuss strategy for Plaintiff's written discovery responses and objections	450.00 hr	0.10	0.10	45.00
06/09/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Continue researching and preparing Plaintiff's objections and responses to written discovery	450.00 hr	6.20	6.20	2,790.00
06/10/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and revise latest draft of Plaintiff's written discovery responses (.6); correspondence with client re: draft responses (.1)	450.00 hr	0.70	0.70	315.00
06/10/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client to discuss her responses to written discovery	450.00 hr	0.30	0.30	135.00
06/13/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion litigation strategy with JLD re: Plaintiff's written discovery responses	450.00 hr	0.10	0.10	45.00
06/13/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: extension of time for parties' respective written discovery responses	450.00 hr	0.20	0.20	90.00
06/13/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: Plaintiff's written discovery responses	450.00 hr	0.20	0.20	90.00
06/14/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: written discovery responses	450.00 hr	0.10	0.10	45.00
06/14/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client to review draft written discovery responses (.8); following call, correspondence with client re: same (.3)	450.00 hr	1.10	1.10	495.00
06/14/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Revise latest draft of Plaintiff's written discovery objections and responses, per JLD edits and following discussion with client	450.00 hr	1.20	1.20	540.00
06/20/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with JLD to discuss litigation strategy	450.00 hr	0.40	0.40	180.00

06/20/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel	450.00 hr	0.10	0.10	45.00
06/21/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with defense counsel to discuss written discovery and potential resolution (.4); correspondence with defense counsel following call re: same (.2)	450.00 hr	0.60	0.60	270.00
06/21/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client to discuss written discovery responses (.2); correspondence with client re: same (.1)	450.00 hr	0.30	0.30	135.00
06/21/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence from client with documents for potential production	450.00 hr	0.30	0.30	135.00
06/23/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence from defense counsel re: informal class and net worth discovery	450.00 hr	0.10	0.10	45.00
06/24/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: written discovery and potential extension of time	450.00 hr	0.20	0.20	90.00
06/28/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel (.1) and client (.1) re: Defendant's impending production of net worth information for settlement discussions	450.00 hr	0.20	0.20	90.00
06/29/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: case update	450.00 hr	0.10	0.10	45.00
06/30/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: case update and settlement discussions	450.00 hr	0.20	0.20	90.00
07/08/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel	450.00 hr	0.10	0.10	45.00
07/11/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with defense counsel to discuss potential class settlement framework	450.00 hr	0.20	0.20	90.00
07/11/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discuss settlement strategy with JLD (.1); prepare settlement correspondence to defense counsel, with edits from JLD (.2)	450.00 hr	0.30	0.30	135.00
07/11/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: case update	450.00 hr	0.10	0.10	45.00
07/11/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Additional correspondence with defense counsel re: proposed settlement class	450.00 hr	0.20	0.20	90.00
07/13/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client to discuss strategy for class settlement demand	450.00 hr	0.70	0.70	315.00
07/14/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare class settlement demand	450.00 hr	0.90	0.90	405.00
07/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with JLD re: settlement strategy (.4); revise class demand, per JLD edits (.2); correspondence with defense counsel with class demand (.1)	450.00 hr	0.70	0.70	315.00
07/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare case management order (.3); correspondence with defense counsel re: same (.1)	450.00 hr	0.40	0.40	180.00
07/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Finalize and submit agreed proposed case management order	450.00 hr	0.20	0.20	90.00

07/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Prepare and finalize cover letter for proposed case management order	450.00 hr	0.30	0.30	135.00
07/19/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review entry of signed case management order	450.00 hr	0.10	0.10	45.00
08/05/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review EDNY decision in Clarke v. McCabe, Weisberg & Conway finding lack of standing for FDCA claims	0 hr	0.20	0	0.00
08/15/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: class demand	450.00 hr	0.10	0.10	45.00
08/15/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review defense counsel's notice of unavailability	450.00 hr	0.10	0.10	45.00
08/15/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client with case update	450.00 hr	0.10	0.10	45.00
08/16/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review Defendant's response to class settlement demand (.1), and discuss same with litigation team (.1)	450.00 hr	0.20	0.20	90.00
08/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Prepare class counteroffer correspondence	450.00 hr	1.60	1.60	720.00
08/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with JLD re: settlement strategy for class counteroffer	450.00 hr	0.60	0.60	270.00
08/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Revise class counteroffer, per JLD edits and comments	450.00 hr	0.30	0.30	135.00
08/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client to discuss Defendant's settlement correspondence and strategy for reply counteroffer	450.00 hr	0.40	0.40	180.00
08/19/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review administration proposal from Class-settlement.com, review and finalize class counteroffer to defense counsel, and correspondence with defense counsel transmitting same	450.00 hr	0.40	0.40	180.00
08/26/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: case update call	450.00 hr	0.10	0.10	45.00
08/29/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with defense counsel to discuss latest class settlement counterdemand and possible resolution	450.00 hr	0.70	0.70	315.00
08/29/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Settlement strategy with JLD re: phone call with defense counsel and obtaining second administration proposal	450.00 hr	0.20	0.20	90.00
08/29/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with Continental DataLogix re: settlement administration proposal	450.00 hr	0.10	0.10	45.00
08/31/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: ongoing class settlement negotiations	450.00 hr	0.10	0.10	45.00
09/06/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review class settlement administration proposal from Continental DataLogix and discuss with litigation team (.1); correspondence with defense counsel transmitting same (.1)	450.00 hr	0.20	0.20	90.00
09/07/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: class settlement negotiations	450.00 hr	0.10	0.10	45.00

09/12/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: settlement discussions and discovery deadline	450.00 hr	0.10	0.10	45.00
09/19/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with defense counsel re: possible class resolution	450.00 hr	0.10	0.10	45.00
09/20/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: negotiations on class settlement	450.00 hr	0.10	0.10	45.00
09/21/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review settlement correspondence from defense counsel	450.00 hr	0.10	0.10	45.00
09/22/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Settlement correspondence with defense counsel	450.00 hr	0.10	0.10	45.00
09/22/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with defense counsel to discuss possible class resolution (.5); following call, discuss settlement strategy with JLD (.2)	450.00 hr	0.70	0.70	315.00
09/23/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client to discuss settlement strategy	450.00 hr	0.20	0.20	90.00
09/23/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review settlement correspondence from defense counsel re: fees (.1), and prepare draft response for JLD to review (.4)	450.00 hr	0.50	0.50	225.00
09/23/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Follow up with F. Barkan re: administration proposal for settlement	450.00 hr	0.10	0.10	45.00
09/26/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Return correspondence to defense counsel re: fee negotiations	450.00 hr	0.20	0.20	90.00
09/26/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with JLD re: settlement strategy	450.00 hr	0.10	0.10	45.00
09/26/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review settlement correspondence from defense counsel (.1), then discuss strategy with JLD (.2)	450.00 hr	0.30	0.30	135.00
09/28/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Settlement strategy with JLD re: fees negotiations	450.00 hr	0.20	0.20	90.00
10/03/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Settlement strategy with JLD re: fees negotiations	450.00 hr	0.20	0.20	90.00
10/03/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with defense counsel to discuss fees negotiations	450.00 hr	0.40	0.40	180.00
10/03/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: fees negotiations	450.00 hr	0.20	0.20	90.00
10/10/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Prepare notice of deposition to Defendant, and research and prepare subpoena to Countryside North with accompanying schedule A and B	450.00 hr	1.60	1.60	720.00
10/10/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Strategy with JLD re: status of settlement negotiations (.2); correspondence with defense counsel summarizing negotiations to date and confirming parties' positions for moving forward (.3)	450.00 hr	0.50	0.50	225.00
10/11/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with client re: settlement update and deposition details	450.00 hr	0.20	0.20	90.00

10/12/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: deposition scheduling	450.00 hr	0.10	0.10	45.00
10/12/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: deposition scheduling for Plaintiff and Defendant	450.00 hr	0.10	0.10	45.00
10/13/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with defense counsel re: fee negotiations	450.00 hr	0.20	0.20	90.00
10/13/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Strategy discussion with JLD re: fee negotiations	450.00 hr	0.20	0.20	90.00
10/14/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with defense counsel re: fee negotiations and discovery deadline	450.00 hr	0.10	0.10	45.00
10/14/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Settlement correspondence with defense counsel re: attorneys' fees (.2), and strategy with JLD re: same (.1)	450.00 hr	0.30	0.30	135.00
10/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with defense counsel re: fee negotiations	450.00 hr	0.10	0.10	45.00
10/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with JLD re: fee negotiation strategy (.1); settlement correspondence with defense counsel re: fee negotiations (.1)	450.00 hr	0.20	0.20	90.00
10/20/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence from defense counsel re: fees, and discuss strategy with JLD	450.00 hr	0.20	0.20	90.00
10/21/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone calls with defense counsel re: fee negotiations	450.00 hr	0.20	0.20	90.00
10/21/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with defense counsel to discuss fee negotiations	450.00 hr	0.10	0.10	45.00
10/25/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with defense counsel to discuss fee negotiations	450.00 hr	0.10	0.10	45.00
10/25/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: fee negotiations and notice of settlement	450.00 hr	0.10	0.10	45.00
10/26/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: preparation of written class settlement agreement	450.00 hr	0.10	0.10	45.00
10/27/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Prepare class settlement agreement and exhibits	450.00 hr	0.90	0.90	405.00
11/01/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: settlement	450.00 hr	0.10	0.10	45.00
11/01/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare class action settlement agreement and supporting materials	450.00 hr	0.80	0.80	360.00
11/02/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: settlement update	450.00 hr	0.10	0.10	45.00
11/08/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client to discuss class settlement and preliminary approval process	450.00 hr	0.30	0.30	135.00

11/08/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Finalize notice of settlement, and correspondence with defense counsel re: same	450.00 hr	0.20	0.20	90.00
11/08/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Continue preparing class settlement materials	450.00 hr	0.60	0.60	270.00
11/09/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Prepare class settlement materials	450.00 hr	0.50	0.50	225.00
11/10/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Prepare class settlement materials	450.00 hr	1.30	1.30	585.00
11/10/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discuss strategy with JLD for class settlement agreement structure	450.00 hr	0.70	0.70	315.00
11/15/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with MLG re: settlement strategy	450.00 hr	0.30	0.30	135.00
11/15/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with JLD re: settlement strategy	450.00 hr	0.10	0.10	45.00
11/15/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Continue preparing draft settlement materials	450.00 hr	0.60	0.60	270.00
11/16/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Prepare class settlement agreement, proposed preliminary approval order, proposed final approval order, and long form class notice	450.00 hr	3.70	3.70	1,665.00
11/16/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare Plaintiff's preliminary approval motion	450.00 hr	0.50	0.50	225.00
11/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Revise class settlement agreement and exhibits, per JLD edits, then finalize for transmittal to defense counsel	450.00 hr	0.70	0.70	315.00
11/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: draft settlement materials	450.00 hr	0.10	0.10	45.00
11/18/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare Plaintiff's preliminary approval motion	450.00 hr	3.80	3.80	1,710.00
11/29/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: draft settlement materials	450.00 hr	0.10	0.10	45.00
11/29/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare Plaintiff's preliminary approval motion	450.00 hr	0.90	0.90	405.00
11/29/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review defense counsel's edits to draft settlement agreement, and discuss same with JLD	450.00 hr	0.20	0.20	90.00
11/30/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: class settlement agreement revisions and preparation of preliminary approval motion	450.00 hr	0.10	0.10	45.00
11/30/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with administrator to discuss class notice proposal	450.00 hr	0.10	0.10	45.00
12/05/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Revise latest draft of class settlement agreement, per defense counsel's edits	450.00 hr	0.50	0.50	225.00

12/05/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare Plaintiff's preliminary approval motion	450.00 hr	4.50	4.50	2,025.00
12/06/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Continue researching and preparing Plaintiff's preliminary approval motion and counsel's supporting declaration	450.00 hr	2.90	2.90	1,305.00
12/06/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client to discuss proposed revisions to draft class settlement agreement	450.00 hr	0.20	0.20	90.00
12/07/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: revisions to draft settlement agreement and preparation of preliminary approval motion	450.00 hr	0.10	0.10	45.00
12/07/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Additional revisions to latest draft of class settlement agreement (.1); correspondence with defense counsel transmitting latest redline and discussing revisions (.2)	450.00 hr	0.30	0.30	135.00
12/07/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Revise Plaintiff's preliminary approval motion, per JLD edits	450.00 hr	0.30	0.30	135.00
12/14/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with defense counsel to discuss revisions to settlement agreement	450.00 hr	0.20	0.20	90.00
12/16/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: settlement	450.00 hr	0.10	0.10	45.00
12/20/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: Defendant's balance sheet (.2); discuss same with JLD (.1)	450.00 hr	0.30	0.30	135.00
12/21/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: class settlement agreement revisions	450.00 hr	0.10	0.10	45.00
12/21/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with defense counsel to discuss Defendant's balance sheet	450.00 hr	0.20	0.20	90.00
12/21/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Prepare proposed non-disparagement provision for class settlement agreement (.3), and correspondence with defense counsel re: same (.1)	450.00 hr	0.40	0.40	180.00
12/27/2022	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client to discuss draft settlement agreement	450.00 hr	0.10	0.10	45.00
01/09/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence to defense counsel re: draft settlement agreement	450.00 hr	0.10	0.10	45.00
01/11/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client to discuss settlement agreement	450.00 hr	0.10	0.10	45.00
01/12/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: draft agreement	450.00 hr	0.10	0.10	45.00
01/17/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Settlement correspondence with defense counsel	450.00 hr	0.20	0.20	90.00
01/18/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: draft settlement agreement	450.00 hr	0.10	0.10	45.00
01/27/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: draft settlement agreement	450.00 hr	0.10	0.10	45.00

01/30/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Revise latest draft of settlement agreement and supporting exhibits, and Plaintiff's preliminary approval motion (.4); correspondence with defense counsel re: same (.1)	450.00 hr	0.50	0.50	225.00
02/02/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence from defense counsel re: settlement agreement	450.00 hr	0.10	0.10	45.00
02/14/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with defense counsel re: finalizing agreement and preliminary approval motion	450.00 hr	0.10	0.10	45.00
02/15/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: finalizing class settlement agreement	450.00 hr	0.10	0.10	45.00
02/21/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: settlement agreement	450.00 hr	0.10	0.10	45.00
02/27/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: settlement agreement	450.00 hr	0.10	0.10	45.00
03/06/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: written settlement agreement	450.00 hr	0.10	0.10	45.00
03/07/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with defense counsel re: signed agreement	450.00 hr	0.10	0.10	45.00
03/07/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: class settlement agreement for signature	450.00 hr	0.20	0.20	90.00
03/09/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: settlement agreement	450.00 hr	0.10	0.10	45.00
03/09/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review order requiring case status report, and attention to calendar for same	450.00 hr	0.20	0.20	90.00
03/10/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review correspondence from defense counsel re: preliminary approval motion	450.00 hr	0.10	0.10	45.00
03/14/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with JLD to discuss class settlement agreement	450.00 hr	0.10	0.10	45.00
03/14/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: settlement agreement	450.00 hr	0.10	0.10	45.00
03/14/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Attention to signed settlement agreement (.1); edits to latest draft of proposed preliminary approval order (.1); correspondence with defense counsel re: same (.1)	450.00 hr	0.30	0.30	135.00
03/14/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and finalize for filing Plaintiff's preliminary approval motion, proposed order, and counsel's supporting declaration with fully executed settlement agreement	450.00 hr	0.80	0.80	360.00
03/14/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Prepare cover letter for proposed preliminary approval order (.1), and correspondence with defense counsel re: same (.1)	450.00 hr	0.20	0.20	90.00
03/15/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and finalize cover letter to court transmitting proposed preliminary approval order (.4); correspondence with defense counsel re: same (.1)	450.00 hr	0.50	0.50	225.00
03/15/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with client re: settlement agreement	450.00 hr	0.20	0.20	90.00

03/22/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review order requiring resubmission of proposed preliminary approval order (.1); correspondence with defense counsel to select proposed final approval hearing date and time (.2); correspondence with judicial assistant to schedule same (.1)	450.00 hr	0.40	0.40	180.00
03/27/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Prepare updated proposed preliminary approval order (.1); prepare new cover letter to accompany updated preliminary approval order (.2); correspondence with defense counsel re: same (.1)	450.00 hr	0.40	0.40	180.00
03/27/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review preliminary approval order (.1); attention to calendar for relevant deadlines (.1); prepare updated class notice (.1); correspondence with administrator, defense counsel re: same (.2); correspondence with client re: same (.1)	450.00 hr	0.60	0.60	270.00
04/05/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Discussion with litigation team re: class notice campaign	450.00 hr	0.30	0.30	135.00
04/06/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with administrator re: notice admin (.1); correspondence with defense counsel re: class list (.1)	450.00 hr	0.20	0.20	90.00
04/07/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Prepare status report (.2), and correspondence with defense counsel re: same (.1)	450.00 hr	0.30	0.30	135.00
04/07/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Finalize status report for filing	450.00 hr	0.10	0.10	45.00
04/10/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with administrator, defense counsel re: class notice campaign	450.00 hr	0.20	0.20	90.00
04/13/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review class list from defense counsel (.1) and discuss with administrator (.2); phone call with defense counsel re: necessary supplementation (.2); correspondence with defense counsel, administrator re: same (.1); discussion with JLD for strategy re: same (.3)	450.00 hr	0.90	0.90	405.00
04/13/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review finalized notice from administrator	450.00 hr	0.10	0.10	45.00
04/13/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: class notice mailings	450.00 hr	0.10	0.10	45.00
04/14/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with client re: class notice campaign	450.00 hr	0.10	0.10	45.00
04/14/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with defense counsel re: class list (.1); and correspondence with administrator re: latest version of class list (.1)	450.00 hr	0.20	0.20	90.00
04/14/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with administrator, defense counsel re: discrepancies in class list	450.00 hr	0.20	0.20	90.00
04/17/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Prepare settlement webpage	450.00 hr	0.30	0.30	135.00
04/17/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with administrator re: class notice dissemination	450.00 hr	0.10	0.10	45.00
04/18/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Correspondence with administrator re: class notice dissemination	450.00 hr	0.10	0.10	45.00
04/18/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Research and prepare fee petition	450.00 hr	1.40	1.40	630.00

04/19/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Continue researching and preparing fee petition	450.00 hr	2.40	2.40	1,080.00
04/24/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Phone call with class member Meagan T. to answer questions about settlement	450.00 hr	0.30	0.30	135.00
04/24/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Continue researching and preparing Plaintiff's fee petition and counsel's supporting declaration	450.00 hr	4.30	4.30	1,935.00
04/25/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Revise latest draft of fee petition and counsel's supporting declaration, per JLD edits and comments (.6); then review and finalize draft petition to send to defense counsel (.3)	450.00 hr	0.90	0.90	405.00
04/26/2023	Gathen, Heidi	Cianfrone, Nikiloff, Grant & Greenberg, P.A.	Review and finalize Plaintiff's fee petition, counsel's supporting declaration, and associated time records	450.00 hr	0.50	0.50	225.00
Total Labor For Jesse Johnson					150.50	150.00	67,500.00
Total Expense For Jesse Johnson						891.45	891.45
Total For Jesse Johnson							68,391.45
Grand Total Labor					172.20	170.60	77,800.00
Grand Total Expenses						891.45	891.45
Grand Total							78,691.45
Total Times for All Currencies:					172.20	170.60	