

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

KAYLA HERNANDEZ, on behalf of herself
and others similarly situated,

Plaintiff,

v.

STATE ROAD AUTO SALES, INC.,

Defendant.

Civil Action No. 1:19-cv-11525-NMG

**DECLARATION OF JESSE S. JOHNSON
IN SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF AN INCENTIVE
AWARD AND AN AWARD OF
ATTORNEYS' FEES, COSTS, AND
LITIGATION EXPENSES**

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

1. My name is Jesse S. Johnson.
2. I am over twenty-one years of age, and I am fully competent to make the statements contained in this declaration.
3. I have personal knowledge of the matters stated herein and, if called upon, could and would competently testify thereto.
4. I am a partner at the law firm of Greenwald Davidson Radbil PLLC ("GDR"), the Court-appointed class counsel in this matter.
5. I am admitted before this Court *pro hac vice*.
6. I submit this declaration in support of Kayla Hernandez's ("Plaintiff") request for approval of an incentive award and an award of attorneys' fees, costs, and litigation expenses.

Class Counsel

7. I graduated from the University of Florida in 2005 and the University of Florida Fredric G. Levin College of Law in 2009.
8. I have extensive experience litigating consumer protection class actions, including

those brought under the Consumer Leasing Act (“CLA”).

9. Prior to joining GDR in 2015, I spent five years as a litigator at Robbins Geller Rudman & Dowd LLP—one of the nation’s largest plaintiffs’ class action firms.

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

11. Senior partner James L. Davidson also assisted on this matter.

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

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

14. He has more than 16 years of litigation experience, including 11 years prosecuting class actions.

15. Collectively, the attorneys at GDR have been appointed class counsel in many class actions throughout the country, including those brought under such consumer protection statutes as the CLA, the Truth in Lending Act (“TILA”), the Fair Debt Collection Practices Act (“FDCPA”), and the Telephone Consumer Protection Act (“TCPA”). *See, e.g., Danger v. Nextep Funding, LLC*, No. 18-567, 2020 WL 4034822 (D. Minn. July 17, 2020) (CLA and TILA); *Newman v. Edoardo Meloni, P.A.*, No. 20-60027, 2020 WL 3052801 (S.D. Fla. June 5, 2020) (FDCPA); *Claxton v. Alliance CAS, LLC*, No. 19-61002, 2020 WL 2759826 (S.D. Fla. May 27, 2020) (FDCPA); *Riddle v. Atkins & Ogle Law Offices, LC*, No. 19-249, 2020 WL 1303939 (S.D. W. Va. Feb. 26, 2020) (FDCPA); *Taylor v. TimePayment Corp.*, No. 18-378, 2020 WL 906319 (E.D. Va. Feb. 24, 2020) (CLA and TILA); *Sullivan v. Marinosci Law Grp., P.C., P.A.*, No. 18-81368, 2019 WL 6709575 (S.D. Fla. Nov. 22, 2019) (FDCPA); *Sheean v. Convergent*

Outsourcing, Inc., No. 18-11532, 2019 WL 6039921 (E.D. Mich. Nov. 14, 2019) (TCPA); *Aikens v. Malcolm Cisneros, A Law Corp.*, No. 17-2462, 2019 WL 3491928 (C.D. Cal. July 31, 2019) (FDCPA); *Hoffman v. Law Office of Fradkin & Weber, P.A.*, No. 19-163, 2019 WL 2723581 (D. Md. July 1, 2019) (FDCPA); *Williams v. Bluestem Brands, Inc.*, No. 17-1971, 2019 WL 1450090 (M.D. Fla. Apr. 2, 2019) (TCPA); *Spencer v. #1 A LifeSafer of Ariz., LLC*, No. 18-2225, 2019 WL 1034451 (D. Ariz. Mar. 4, 2019) (CLA); *Knapper v. Cox Commc'ns, Inc.*, 329 F.R.D. 238 (D. Ariz. 2019) (TCPA); *Dickens v. GC Servs. Ltd. P'ship*, No. 16-803, 2018 WL 4732478 (M.D. Fla. Oct. 2, 2018) (FDCPA); *Beck v. Thomason Law Firm, LLC*, No. 16-570, 2017 WL 3267751 (D.N.M. July 27, 2017) (FDCPA); *Johnson v. Navient Solutions, Inc.*, No. 15-716 (S.D. Ind. July 13, 2017) (TCPA); *Toure v. Navient Solutions, Inc.*, No. 17-71 (S.D. Ind. July 13, 2017) (TCPA); *James v. JPMorgan Chase Bank, N.A.*, No. 15-2424, 2017 WL 2472499 (M.D. Fla. June 5, 2017) (TCPA); *Johnston v. Kass Shuler, P.A.*, No. 16-3390, 2017 WL 1231070 (M.D. Fla. Mar. 29, 2017) (FDCPA); *Ryan v. DeVille Asset Mgmt., Ltd.*, No. 15-1067, 2016 WL 7165751 (D. Or. Dec. 7, 2016) (FDCPA); *Jallo v. Resurgent Capital Servs., L.P.*, No. 14-449, 2016 WL 6610322 (E.D. Tex. Nov. 8, 2016) (FDCPA); *Rhodes v. Nat'l Collection Sys., Inc.*, 317 F.R.D. 579 (D. Colo. 2016) (FDCPA); *Gonzalez v. Germaine Law Office PLC*, No. 15-1427, 2016 WL 5844605 (D. Ariz. Oct. 3, 2016) (FDCPA); *McCurdy v. Prof'l Credit Serv.*, No. 15-1498, 2016 WL 5853721 (D. Or. Oct. 3, 2016) (FDCPA); *Marcoux v. Susan J. Szwed, P.A.*, No. 15-93, 2016 WL 5720713 (D. Me. Oct. 3, 2016) (FDCPA); *Cobb v. Edward F. Bukaty, III, PLC*, No. 15-335, 2016 WL 4925165 (M.D. La. Sept. 14, 2016) (FDCPA); *Cross v. Wells Fargo Bank, N.A.*, No. 15-1270, 2016 WL 5109533 (N.D. Ga. Sept. 13, 2016) (TCPA); *Schell v. Frederick J. Hanna & Assocs., P.C.*, No. 15-418, 2016 WL 3654472 (S.D. Ohio July 8, 2016) (FDCPA); *Schuchardt v. Law Office of Rory W. Clark*, 314 F.R.D. 673 (N.D. Cal. 2016)

(FDCPA); *Whitford v. Weber & Olcese, P.L.C.*, No. 15-400, 2016 WL 122393 (W.D. Mich. Jan. 11, 2016) (FDCPA); *Garza v. Mitchell Rubenstein & Assocs., P.C.*, No. 15-1572, 2015 WL 9594286 (D. Md. Dec. 28, 2015) (FDCPA); *Baldwin v. Glasser & Glasser, P.L.C.*, No. 15-490, 2015 WL 77669207 (E.D. Va. Dec. 1, 2015) (FDCPA); *McWilliams v. Advanced Recovery Sys., Inc.*, 310 F.R.D. 337 (S.D. Miss. 2015) (FDCPA); *Rhodes v. Olson Assocs., P.C. d/b/a Olson Shaner*, 83 F. Supp. 3d 1096 (D. Colo. 2015) (FDCPA); *Roundtree v. Bush Ross, P.A.*, 304 F.R.D 644 (M.D. Fla. 2015) (FDCPA).

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

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

18. For example, 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:

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).

19. 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).

20. And recently, in *Leboeuf v. Forster & Garbus LLP*, Judge Wendy B. Vitter of the Eastern District of Louisiana characterized GDR's work in an FDCPA class action as follows:

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

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

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

22. GDR has protected, and will continue to vigorously protect, the interests of all members of the settlement class.

23. GDR undertook its representation of Plaintiff on a contingency basis and has advanced all costs necessary to successfully prosecute this action to date, which it will continue to do as this case proceeds through final approval.

Settlement Terms

24. State Road Auto Sales, Inc. ("Defendant") will create a class settlement fund of \$18,000 for the benefit of 868 potential class members, allowing for likely individual cash payments of between \$103 and \$206 per participating class member, based on historical claims rates in actions like this.

25. Class members will release their CLA claims against Defendant related to their motor vehicle lease agreements signed during the relevant time period.

26. Any unclaimed settlement funds ultimately will be redirected to Greater Boston Legal Services as the Court-approved *cy pres* award recipient, rather than revert to Defendant.

27. Defendant separately paid all costs of direct mail class notice and will pay for all

remaining settlement administration costs.

28. Defendant also separately will pay \$2,000 to Plaintiff in recognition of her service to the class members, subject to the Court's approval.

29. As well, Defendant separately will pay an award of attorney's fees, costs and litigation expenses to Plaintiff's counsel in an amount to be determined by this Court.

30. The parties have agreed to a range for attorneys' fees of \$37,000 to \$57,000, meaning Defendant will not oppose up to \$37,000 but has reserved its right to contest any amount requested above \$37,000.

31. Plaintiff has agreed not to seek more than \$57,000 in fees, as reflected in her accompanying motion.

32. Of note, neither Plaintiff's incentive award nor the attorneys' fee and expense awards (in whatever amount this Court approves) will dilute class members' recoveries here, as those awards will be paid separate and apart from the \$18,000 class settlement fund.

33. Also important, Defendant has confirmed that it changed its form motor vehicle lease agreement as compared to what Plaintiff and the class members signed—a public benefit for any consumer who does business with Defendant in the future.

34. The parties informed class members via direct mail notice of the settlement's benefits, including the proposed incentive award and attorneys' fee and expense awards.

35. Defendant also directed notice to the requisite governmental agencies pursuant to the Class Action Fairness Act.

36. To date, significantly, no class member or agency has objected to any aspect of the settlement.

Class Counsel's Reasonable Attorneys' Fees

37. GDR devoted substantial time and resources to this case by, *inter alia*: (a) conducting an investigation into the underlying facts regarding Plaintiff's and the class's claims; (b) preparing the class action complaint, and researching Defendant's defenses thereto; (c) conferring with Defendant's counsel to prepare the parties' joint statement and proposed pretrial schedule; (d) attending the scheduling conference before this Court; (e) preparing and serving Plaintiff's first sets of interrogatories, requests for production of documents, and requests for admission directed to Defendant; (f) analyzing Defendant's net worth for purposes of class damages; (g) negotiating and preparing the parties' class action settlement agreement, including the proposed direct mail and website class notices; (h) researching and preparing Plaintiff's motion for preliminary approval of the class settlement, proposed preliminary approval order, and associated supplemental authority; (i) coordinating with the settlement administrator for dissemination of class notice; (j) researching and preparing Plaintiff's motion for approval of an incentive award and an award of attorneys' fees and expenses, and associated proposed order; (k) preparing the instant declaration in support of Plaintiff's fee and expense request; and (l) repeatedly conferring with Plaintiff and Defendant's counsel throughout the litigation.

38. What's more, GDR's attorneys still must perform additional work to shepherd this case through final approval, including: (1) researching and preparing a reply brief in further support of Plaintiff's fee and expense petition; (2) answering questions from class members regarding the settlement and claims process; (3) researching and preparing Plaintiff's motion for final approval of the class settlement, and the corresponding proposed final approval order and judgment; (4) preparing for, traveling to, and attending the final fairness hearing in Boston; (5) coordinating with the administrator and Defendant's counsel to administer the settlement fund;

and (6) conferring with class members as necessary regarding claims, settlement checks, or other related concerns.

39. GDR worked efficiently in advancing Plaintiff's and the class's claims, pursuing relevant discovery, and then engaging in productive settlement discussions while navigating the risks of contingent class action litigation and ultimately bringing this matter to a successful resolution for all class members.

40. Based on the quality of GDR's work, the reasonable hours expended, the benefits obtained for Plaintiff and the class in light of the risks of litigation, and also given Defendant's agreement to pay GDR's attorneys' fees, the requested fee and expense award is reasonable and should be approved.

41. As of the date of this declaration, GDR's attorneys have billed a collective total of 135.1 hours litigating this case.¹

42. I, as the lead attorney on this case, have spent a total of 122 hours, while Mr. Davidson contributed 13.1 hours.

43. The time spent by Mr. Davidson largely entailed reviewing and revising pleadings and motion briefing, and engaging in litigation and settlement strategy.

44. A detailed accounting of GDR's time spent on this matter is attached as Exhibit A; GDR's attorneys entered these electronically stored time records contemporaneously with the tasks to which they relate, so the records reflect a true and accurate copy of GDR's time entries in this case.

45. I also conservatively estimate that this case will require 35 to 45 more hours of my time, which will be spent on the various tasks listed above.

¹ This total does *not* include certain attorney time that, in an exercise of billing discretion, GDR has marked as non-billable and thus zeroed out for exclusion from counsel's lodestar tally.

46. During this litigation, I billed at \$400 per hour, and Mr. Davidson billed at \$450 per hour.

47. Multiplying the hours incurred by each GDR attorney by his applicable hourly rate produces a current lodestar of \$54,695; further, including my additional estimated time necessary to conclude this matter (35 to 45 hours) yields a total estimated lodestar here of between \$68,695 and \$72,695.

48. Worth noting, this lodestar tally does *not* include any time devoted to this case by liaison counsel, Kevin V.K. Crick of Rights Protection Law Group, PLLC.

Reimbursement of Costs and Litigation Expenses Incurred

49. Separately from the attorneys' fees, Plaintiff also seeks for her counsel reimbursement of costs and litigation expenses reasonably incurred in connection with the prosecution of Plaintiff's and the class's claims.

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

51. To date, GDR has incurred \$664.23 in costs and litigation expenses, which include the filing fee for the complaint (\$400), the fee for service of process on Defendant (\$50), costs for counsel's *pro hac vice* admissions (\$200), and postage charges for delivery of courtesy copies of case documents (\$14.23).

52. GDR also anticipates incurring additional expenses associated with delivery of courtesy copies for future briefing and travel from Boca Raton, Florida to Boston for the final fairness hearing, including airfare, hotel, and transportation and meal costs during travel.

53. Counsel estimates that these additional expenses will total approximately \$600 but will provide specific reimbursement figures, once incurred, in advance of the final fairness

hearing.

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

55. I respectfully submit that the requested fee and expense award—which is unopposed by the class, and which will be less than my firm’s combined lodestar and expenses at the conclusion of this case—is reasonable for a class action, particularly one where class members are receiving such meaningful benefits.

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

Executed on September 28, 2020.

By: /s/ Jesse S. Johnson
Jesse S. Johnson

Exhibit A

Greenwald Davidson Radbil PLLC - User Summary

Date Start: 1/1/2018 | Date End: 9/28/2020 | Clients: Hernandez, Kayla | Projects: State Road Auto Sales | Users: Jesse Johnson,James Davidson | Account Managers: All

Date	Client	Project	Description	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
James Davidson							
04/23/2019	Hernandez, Kayla	State Road Auto Sales	Phone call with K. Crick re potential new case.	450.00 hr	0.20	0.20	90.00
05/07/2019	Hernandez, Kayla	State Road Auto Sales	Review new documents from client and begin researching potential claims.	450.00 hr	0.40	0.40	180.00
05/07/2019	Hernandez, Kayla	State Road Auto Sales	Research Defendant and continue researching potential claims.	450.00 hr	1.00	1.00	450.00
05/21/2019	Hernandez, Kayla	State Road Auto Sales	Attention to file opening and time transfer.	0 hr	0.30	0	0.00
06/21/2019	Hernandez, Kayla	State Road Auto Sales	Review and comment on draft class action complaint.	450.00 hr	0.60	0.60	270.00
06/21/2019	Hernandez, Kayla	State Road Auto Sales	Discussion with JJ re complaint.	450.00 hr	0.30	0.30	135.00
06/26/2019	Hernandez, Kayla	State Road Auto Sales	Strategy with JJ re complaint.	450.00 hr	0.20	0.20	90.00
07/24/2019	Hernandez, Kayla	State Road Auto Sales	Discussion with JJ re case status.	450.00 hr	0.10	0.10	45.00
07/25/2019	Hernandez, Kayla	State Road Auto Sales	Strategy with JJ re discussion with defense counsel.	450.00 hr	0.10	0.10	45.00
09/10/2019	Hernandez, Kayla	State Road Auto Sales	Review Defendant's answer and affirmative defenses.	450.00 hr	0.20	0.20	90.00
09/12/2019	Hernandez, Kayla	State Road Auto Sales	Strategy with JJ re discovery.	450.00 hr	0.10	0.10	45.00
09/18/2019	Hernandez, Kayla	State Road Auto Sales	Strategy with litigation team re case status.	450.00 hr	0.10	0.10	45.00
09/24/2019	Hernandez, Kayla	State Road Auto Sales	Strategy with JJ re settlement discussions.	450.00 hr	0.20	0.20	90.00
09/25/2019	Hernandez, Kayla	State Road Auto Sales	Review and comment on draft class demand letter.	450.00 hr	0.20	0.20	90.00
09/25/2019	Hernandez, Kayla	State Road Auto Sales	Strategy with JJ re settlement.	450.00 hr	0.10	0.10	45.00
10/03/2019	Hernandez, Kayla	State Road Auto Sales	Review correspondence from defendant re settlement counter-offer.	450.00 hr	0.10	0.10	45.00
10/04/2019	Hernandez, Kayla	State Road Auto Sales	Exchange of correspondence with JJ re no exclusions from settlement.	450.00 hr	0.10	0.10	45.00
10/07/2019	Hernandez, Kayla	State Road Auto Sales	Strategy with JJ re settlement.	450.00 hr	0.20	0.20	90.00
10/07/2019	Hernandez, Kayla	State Road Auto Sales	Review draft email to defense counsel regarding statement terms, fees.	450.00 hr	0.10	0.10	45.00
10/15/2019	Hernandez, Kayla	State Road Auto Sales	Strategy with JJ re moving scheduling conference.	450.00 hr	0.10	0.10	45.00
10/15/2019	Hernandez, Kayla	State Road Auto Sales	Review Defendant's motion to continue scheduling conference.	450.00 hr	0.10	0.10	45.00
10/16/2019	Hernandez, Kayla	State Road Auto Sales	Review text order continuing scheduling conference.	450.00 hr	0.10	0.10	45.00
10/31/2019	Hernandez, Kayla	State Road Auto Sales	Review and comment on first set of discovery to Defendant.	450.00 hr	0.50	0.50	225.00

11/21/2019	Hernandez, Kayla	State Road Auto Sales	Review and comment on JLD pro hac motion and declaration in support.	450.00 hr	0.10	0.10	45.00
11/22/2019	Hernandez, Kayla	State Road Auto Sales	Review and comment on draft joint discovery plan.	450.00 hr	0.20	0.20	90.00
11/26/2019	Hernandez, Kayla	State Road Auto Sales	Review draft notice of filing signed rule 16 certification.	450.00 hr	0.10	0.10	45.00
12/03/2019	Hernandez, Kayla	State Road Auto Sales	Review text entry with case schedule.	0 hr	0.10	0	0.00
12/04/2019	Hernandez, Kayla	State Road Auto Sales	Review order referring case to ADR.	0 hr	0.10	0	0.00
12/09/2019	Hernandez, Kayla	State Road Auto Sales	Review and comment on draft initial disclosures.	450.00 hr	0.20	0.20	90.00
12/30/2019	Hernandez, Kayla	State Road Auto Sales	Strategy with JJ re settlement, repossession notice for client's vehicle.	450.00 hr	0.40	0.40	180.00
01/06/2020	Hernandez, Kayla	State Road Auto Sales	Strategy with JJ re timing of fee briefing.	450.00 hr	0.10	0.10	45.00
01/15/2020	Hernandez, Kayla	State Road Auto Sales	Review and comment on draft settlement agreement, long and short form notices, and preliminary and final approval orders.	450.00 hr	2.40	2.40	1,080.00
01/29/2020	Hernandez, Kayla	State Road Auto Sales	Discussion with litigation team re settlement agreement.	450.00 hr	0.10	0.10	45.00
02/05/2020	Hernandez, Kayla	State Road Auto Sales	Strategy with JJ re edits to settlement agreement.	450.00 hr	0.20	0.20	90.00
03/18/2020	Hernandez, Kayla	State Road Auto Sales	Review and revise motion for preliminary approval and declaration in support.	450.00 hr	0.90	0.90	405.00
03/23/2020	Hernandez, Kayla	State Road Auto Sales	Phone call with JJ re client car return and impact on case.	450.00 hr	0.20	0.20	90.00
04/01/2020	Hernandez, Kayla	State Road Auto Sales	Review notice requesting courtesy copy of unopposed motion for preliminary approval.	0 hr	0.10	0	0.00
05/08/2020	Hernandez, Kayla	State Road Auto Sales	Review correspondence from defense counsel regarding return of client's vehicle.	450.00 hr	0.10	0.10	45.00
05/14/2020	Hernandez, Kayla	State Road Auto Sales	Review correspondence from defense counsel re return of client's car.	450.00 hr	0.10	0.10	45.00
05/21/2020	Hernandez, Kayla	State Road Auto Sales	Discussion with JJ re preliminary approval motion	450.00 hr	0.20	0.20	90.00
07/08/2020	Hernandez, Kayla	State Road Auto Sales	Review notice canceling class certification hearing.	0 hr	0.10	0	0.00
07/30/2020	Hernandez, Kayla	State Road Auto Sales	Discussion with JJ re supplemental authority.	450.00 hr	0.10	0.10	45.00
08/04/2020	Hernandez, Kayla	State Road Auto Sales	Review order allowing motion for leave to file supplemental authority.	0 hr	0.10	0	0.00
08/04/2020	Hernandez, Kayla	State Road Auto Sales	Review and comment on draft notice of supplemental authority.	450.00 hr	0.10	0.10	45.00
08/18/2020	Hernandez, Kayla	State Road Auto Sales	Review order granting preliminary approval of settlement.	0 hr	0.10	0	0.00
08/27/2020	Hernandez, Kayla	State Road Auto Sales	Discussion with JJ re class notice.	450.00 hr	0.20	0.20	90.00
09/17/2020	Hernandez, Kayla	State Road Auto Sales	Discussion with JJ re fee negotiations.	450.00 hr	0.20	0.20	90.00
09/24/2020	Hernandez, Kayla	State Road Auto Sales	Review and comment on motion for fees and an incentive award and declaration in support.	450.00 hr	1.00	1.00	450.00
09/28/2020	Hernandez, Kayla	State Road Auto Sales	Review and comment on proposed fee order.	450.00 hr	0.20	0.20	90.00

09/28/2020	Hernandez, Kayla	State Road Auto Sales	Review potential client's lease documents, previous litigation against potential defendant, & discuss potential claims w/ JLD advance of submission to Court with fee petition.	400.00 hr	0.40	0.40	160.00
				Total Labor For James Davidson	14.00	13.10	5,895.00
				Total Expense For James Davidson		0.00	0.00
				Total For James Davidson			5,895.00

Jesse Johnson

05/07/2019	Hernandez, Kayla	State Road Auto Sales	Review potential client's lease documents, previous litigation against potential defendant, & discuss potential claims w/ JLD	400.00 hr	0.40	0.40	160.00
05/08/2019	Hernandez, Kayla	State Road Auto Sales	Review potential client's documents (.1); initial phone consult w/ potential client to discuss possible claims (.9)	400.00 hr	1.00	1.00	400.00
05/08/2019	Hernandez, Kayla	State Road Auto Sales	Prepare retainer agreement & stmt of client's rights (.3); correspondence w/ client re: same (.1)	0 hr	0.40	0	0.00
05/14/2019	Hernandez, Kayla	State Road Auto Sales	Attention to fully executed retainer agreement, and correspondence w/ client re: same	0 hr	0.30	0	0.00
05/22/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss draft complaint	400.00 hr	0.30	0.30	120.00
06/11/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss draft complaint	400.00 hr	0.20	0.20	80.00
06/11/2019	Hernandez, Kayla	State Road Auto Sales	Research & prepare class action complaint	400.00 hr	2.80	2.80	1,120.00
06/12/2019	Hernandez, Kayla	State Road Auto Sales	Continue researching & preparing draft class action complaint	400.00 hr	5.70	5.70	2,280.00
06/14/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss draft complaint	400.00 hr	0.40	0.40	160.00
06/14/2019	Hernandez, Kayla	State Road Auto Sales	Revise draft complaint after speaking w/ client (.2); correspondence w/ client w/ draft complaint (.1)	400.00 hr	0.30	0.30	120.00
06/18/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ client re: draft complaint	400.00 hr	0.10	0.10	40.00
06/21/2019	Hernandez, Kayla	State Road Auto Sales	Revise draft complaint per JLD edits (.5) & further strategy discussion w/ JLD (.3).	400.00 hr	0.80	0.80	320.00
06/25/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ client re: draft complaint	400.00 hr	0.10	0.10	40.00
06/25/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss draft complaint (.5); follow-up correspondence re: same (.1); revise draft complaint consistent w/ same (.2)	400.00 hr	0.80	0.80	320.00
06/26/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ K. Crick to discuss draft complaint	400.00 hr	0.10	0.10	40.00
06/26/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss draft complaint	400.00 hr	0.20	0.20	80.00
06/26/2019	Hernandez, Kayla	State Road Auto Sales	Lit. strategy w/ JLD re: latest draft of complaint	400.00 hr	0.20	0.20	80.00
06/26/2019	Hernandez, Kayla	State Road Auto Sales	Finalize complaint & prepare related materials such as redacted lease exhibit, D. Mass. category form, and summons	400.00 hr	1.10	1.10	440.00
07/01/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ client re: draft complaint	400.00 hr	0.10	0.10	40.00
07/02/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss lease agreement & draft complaint (.2); review correspondence from client re: same (.1)	400.00 hr	0.30	0.30	120.00
07/08/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ client re: lease agreement	400.00 hr	0.30	0.30	120.00
07/09/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ referring counsel re: draft complaint	400.00 hr	0.20	0.20	80.00
07/09/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ client re: complaint	400.00 hr	0.10	0.10	40.00

07/11/2019	Hernandez, Kayla	State Road Auto Sales	Review and finalize final draft of complaint, including preparing supporting documents (redacted lease agreement as exhibit, civil cover sheet, etc.)	400.00 hr	1.80	1.80	720.00
07/11/2019	Hernandez, Kayla	State Road Auto Sales	Review judicial assignment and issuance of summons	400.00 hr	0.20	0.20	80.00
07/11/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ K. Crick re: case filings	400.00 hr	0.10	0.10	40.00
07/11/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ client re: filing of complaint	400.00 hr	0.10	0.10	40.00
07/15/2019	Hernandez, Kayla	State Road Auto Sales	Attention to service of process on Def	0 hr	0.30	0	0.00
07/16/2019	Hernandez, Kayla	State Road Auto Sales	Attention to service of process on Def	0 hr	0.20	0	0.00
07/17/2019	Hernandez, Kayla	State Road Auto Sales	Service of complaint & summons on Def	50.00 ea	1.00	50.00	50.00
07/17/2019	Hernandez, Kayla	State Road Auto Sales	Attention to service of process	0 hr	0.10	0	0.00
07/17/2019	Hernandez, Kayla	State Road Auto Sales	Finalize return of service, and attention to calendar for Def's response deadline	0 hr	0.20	0	0.00
07/24/2019	Hernandez, Kayla	State Road Auto Sales	Review correspondence from C. Oliver	400.00 hr	0.10	0.10	40.00
07/24/2019	Hernandez, Kayla	State Road Auto Sales	Discussion w/ JD re: strategy for possible resolution	400.00 hr	0.10	0.10	40.00
07/24/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ referring counsel re: Def's appearance	400.00 hr	0.20	0.20	80.00
07/25/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ C. Oliver re: Def's response to complaint & possible resolution (.4); following call, lit. strategy discussions w/ JLD (.1)	400.00 hr	0.50	0.50	200.00
07/25/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss possible settlement	400.00 hr	0.20	0.20	80.00
07/31/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ C. Oliver re: extension of Def's answer deadline, and possible resolution	400.00 hr	0.20	0.20	80.00
07/31/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ K. Crick re: status of case & agreement to extension for Def's response to complaint	400.00 hr	0.10	0.10	40.00
08/05/2019	Hernandez, Kayla	State Road Auto Sales	Prepare MOT for admission of JSJ pro hac vice, and counsel's declaration in support of same (1.1); correspondence w/ C. Oliver re: Def's position on Pltff's MOT (.1)	400.00 hr	1.20	1.20	480.00
08/07/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ C. Oliver, K. Crick re: Def's request for extension of time to respond to complaint	400.00 hr	0.10	0.10	40.00
08/07/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ K. Crick re: PHV motion	400.00 hr	0.10	0.10	40.00
08/07/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ C. Oliver, K. Crick re: revised stipulation to extension of time to respond to complaint, and re: Def's non-opposition to JSJ PHV motion	400.00 hr	0.30	0.30	120.00
08/14/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ C. Oliver re: Def's opposition to JSJ PHV motion	400.00 hr	0.10	0.10	40.00
08/14/2019	Hernandez, Kayla	State Road Auto Sales	Review entry of order granting STIP to extend Def's complaint response deadline, and attention to calendar for same	400.00 hr	0.10	0.10	40.00
08/20/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client w/ case update	400.00 hr	0.10	0.10	40.00
08/21/2019	Hernandez, Kayla	State Road Auto Sales	JSJ PHV fee	100.00 ea	1.00	100.00	100.00
08/21/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ C. Oliver re: JSJ PHV motion	400.00 hr	0.10	0.10	40.00

08/21/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ K. Crick re: support documents	400.00 hr	0.20	0.20	80.00
08/23/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ K. Crick w/ case update	400.00 hr	0.20	0.20	80.00
08/26/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ K. Crick re: JSJ PHV motion	400.00 hr	0.10	0.10	40.00
09/10/2019	Hernandez, Kayla	State Road Auto Sales	Review Def's Answer and affirmative defenses	400.00 hr	0.20	0.20	80.00
09/10/2019	Hernandez, Kayla	State Road Auto Sales	Review order granting JSJ PHV admission, and attention to ECF docket	400.00 hr	0.20	0.20	80.00
09/11/2019	Hernandez, Kayla	State Road Auto Sales	Review local rules re: discovery conferences, and correspondence w/ C. Oliver to set up 26(f) conference	400.00 hr	0.20	0.20	80.00
09/11/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client w/ case status update	400.00 hr	0.10	0.10	40.00
09/11/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ K. Crick re: scheduling conference & Rule 26(f) conference	400.00 hr	0.10	0.10	40.00
09/11/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ court clerk re: ECF registration	0 hr	0.10	0	0.00
09/11/2019	Hernandez, Kayla	State Road Auto Sales	Review order setting scheduling conference, and attention to calendar for related deadlines	400.00 hr	0.30	0.30	120.00
09/12/2019	Hernandez, Kayla	State Road Auto Sales	Attention to ECF registration	0 hr	0.10	0	0.00
09/12/2019	Hernandez, Kayla	State Road Auto Sales	Discussion w/ JD re: strategy for discovery conference and scheduling conference.	400.00 hr	0.10	0.10	40.00
09/16/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ K. Crick, chambers re: telephone appearance for scheduling conference	400.00 hr	0.20	0.20	80.00
09/17/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ C. Oliver, K. Crick re: Rule 26(f) conference	400.00 hr	0.10	0.10	40.00
09/20/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ C. Oliver re: 26(f) conference	400.00 hr	0.10	0.10	40.00
09/20/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client w/ case update	400.00 hr	0.60	0.60	240.00
09/24/2019	Hernandez, Kayla	State Road Auto Sales	Review case materials in advance of 26(f) conference (.4); attend 26(f) conference by phone w/ C. Oliver (.8); following conference, settlement discussion w/ JLD (.2)	400.00 hr	1.40	1.40	560.00
09/24/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ B. Hughes re: settlement administration proposal (.1); review proposal (.1)	400.00 hr	0.20	0.20	80.00
09/24/2019	Hernandez, Kayla	State Road Auto Sales	Prepare class settlement demand	400.00 hr	0.70	0.70	280.00
09/24/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss class settlement demand	400.00 hr	0.40	0.40	160.00
09/24/2019	Hernandez, Kayla	State Road Auto Sales	Discuss class settlement demand strategy w/ team	400.00 hr	0.20	0.20	80.00
09/25/2019	Hernandez, Kayla	State Road Auto Sales	Discuss settlement strategy w/ JLD re: class demand (.1); finalize said demand and send to C. Oliver (.2)	400.00 hr	0.30	0.30	120.00
09/25/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ K. Crick re: settlement strategy	400.00 hr	0.30	0.30	120.00
09/30/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client re: case status	400.00 hr	0.20	0.20	80.00
10/01/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss settlement negotiations	400.00 hr	0.20	0.20	80.00
10/01/2019	Hernandez, Kayla	State Road Auto Sales	Review correspondence from C. Oliver	400.00 hr	0.10	0.10	40.00
10/03/2019	Hernandez, Kayla	State Road Auto Sales	Settlement correspondence w/ C. Oliver, and discuss same w/ lit. team	400.00 hr	0.30	0.30	120.00

10/04/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ B. Hughes re: updated administration proposals	400.00 hr	1.00	1.00	400.00
10/04/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ B. Hughes re: updated administration proposals	400.00 hr	0.10	0.10	40.00
10/07/2019	Hernandez, Kayla	State Road Auto Sales	Settlement strategy w/ JLD	400.00 hr	0.20	0.20	80.00
10/07/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss settlement details	400.00 hr	0.50	0.50	200.00
10/07/2019	Hernandez, Kayla	State Road Auto Sales	Prepare proposed settlement response to C. Oliver for discussion w/ JLD.	400.00 hr	0.20	0.20	80.00
10/07/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ K. Crick to discuss settlement negotiations	400.00 hr	0.20	0.20	80.00
10/09/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ K. Crick re: client lease issues	400.00 hr	0.20	0.20	80.00
10/15/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss settlement negotiation progress	400.00 hr	0.50	0.50	200.00
10/15/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ C. Oliver re: continuing discovery conference (.1); lit. strategy w/ JLD re: same (.1)	400.00 hr	0.20	0.20	80.00
10/15/2019	Hernandez, Kayla	State Road Auto Sales	Review filing of Def's unopposed MOT to continue scheduling conference	400.00 hr	0.10	0.10	40.00
10/15/2019	Hernandez, Kayla	State Road Auto Sales	Research & prepare draft joint discovery statement and proposed pretrial schedule	400.00 hr	1.40	1.40	560.00
10/16/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss case update and settlement talks	400.00 hr	0.40	0.40	160.00
10/22/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client re: settlement	400.00 hr	0.30	0.30	120.00
10/22/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ C. Oliver re: discovery conference and settlement discussions	400.00 hr	0.20	0.20	80.00
10/23/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client re: lease concerns	400.00 hr	0.20	0.20	80.00
10/23/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ C. Oliver re: client lease issues	400.00 hr	0.10	0.10	40.00
10/29/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ client re: lease issues	400.00 hr	0.10	0.10	40.00
10/29/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ C. Oliver re: ongoing settlement talks	400.00 hr	0.10	0.10	40.00
10/31/2019	Hernandez, Kayla	State Road Auto Sales	Research and prepare Pltff's 1st set of interrogatories, requests for production, and requests for admission to Def	400.00 hr	2.30	2.30	920.00
10/31/2019	Hernandez, Kayla	State Road Auto Sales	Lit. strategy discussion w/ JLD re: revisions to Pltff's initial written discovery requests to Def	400.00 hr	0.10	0.10	40.00
11/01/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss written discovery requests to Def	400.00 hr	0.40	0.40	160.00
11/01/2019	Hernandez, Kayla	State Road Auto Sales	Revise Pltff's initial written discovery requests to Def, per JLD edits, and per add'l strategy discussions w/ JLD and client	400.00 hr	0.90	0.90	360.00
11/01/2019	Hernandez, Kayla	State Road Auto Sales	Finalize Pltff's initial written discovery to Def (.4); correspondence w/ C. Oliver re: same (.1)	400.00 hr	0.50	0.50	200.00
11/06/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ C. Oliver re: various open case issues	400.00 hr	0.10	0.10	40.00
11/07/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ C. Oliver to discuss various case issues, including possible resolution	400.00 hr	0.60	0.60	240.00
11/14/2019	Hernandez, Kayla	State Road Auto Sales	Phone calls w/ client re: lease issues	400.00 hr	0.50	0.50	200.00
11/14/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ K. Crick re: lit. strategy and upcoming discovery conferece	400.00 hr	0.20	0.20	80.00

11/15/2019	Hernandez, Kayla	State Road Auto Sales	Prepare JLD PHV motion and supporting declaration	400.00 hr	0.40	0.40	160.00
11/15/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client re: various case and lease-related concerns	400.00 hr	0.10	0.10	40.00
11/18/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ C. Oliver to discuss various case issues	400.00 hr	1.90	1.90	760.00
11/18/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client re: ongoing lease issues	400.00 hr	0.60	0.60	240.00
11/18/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ client re: payment ledger	400.00 hr	0.10	0.10	40.00
11/21/2019	Hernandez, Kayla	State Road Auto Sales	Discussion w/ lit. JD re: progress of discovery and upcoming initial conference	400.00 hr	0.10	0.10	40.00
11/22/2019	Hernandez, Kayla	State Road Auto Sales	JLD PHV admission fee	100.00 ea	1.00	100.00	100.00
11/22/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ C. Oliver re: open case issues	400.00 hr	0.40	0.40	160.00
11/22/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client w/ status update	400.00 hr	0.20	0.20	80.00
11/22/2019	Hernandez, Kayla	State Road Auto Sales	Finalize JLD's MOT for admission pro hac vice	400.00 hr	0.30	0.30	120.00
11/22/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ C. Oliver, K. Crick re: JLD pro hac vice admission motion	400.00 hr	0.20	0.20	80.00
11/25/2019	Hernandez, Kayla	State Road Auto Sales	Continue researching & preparing proposed joint discovery statement & proposed pretrial schedule	400.00 hr	0.80	0.80	320.00
11/26/2019	Hernandez, Kayla	State Road Auto Sales	Finalize draft joint statement and proposed pretrial schedule (.3); discuss same w/ JLD (.1); correspondence w/ C. Oliver re: same (.1)	400.00 hr	0.50	0.50	200.00
11/26/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client re: LR 16.1 certification and other case issues	400.00 hr	0.30	0.30	120.00
11/26/2019	Hernandez, Kayla	State Road Auto Sales	Revise draft joint discovery statement, per C. Oliver's edits (.3); correspondence w/ C. Oliver re: same (.1)	400.00 hr	0.40	0.40	160.00
11/27/2019	Hernandez, Kayla	State Road Auto Sales	Review order granting JLD PHV admission	400.00 hr	0.10	0.10	40.00
11/27/2019	Hernandez, Kayla	State Road Auto Sales	Review order rescheduling conference for 12/3/19 and correspondence w/ K. Crick re: conference.	400.00 hr	0.10	0.10	40.00
11/27/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ C. Oliver re: final draft of joint discovery statement	400.00 hr	0.20	0.20	80.00
11/27/2019	Hernandez, Kayla	State Road Auto Sales	Finalize parties' LR 16.1 joint discovery statement and proposed pretrial schedule	400.00 hr	0.20	0.20	80.00
12/02/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ C. Oliver re: extension for Def's discovery responses	400.00 hr	0.10	0.10	40.00
12/02/2019	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ chambers re: teleconference info for scheduling conference	400.00 hr	0.10	0.10	40.00
12/03/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ K. Crick to discuss strategy for scheduling conference	400.00 hr	0.60	0.60	240.00
12/03/2019	Hernandez, Kayla	State Road Auto Sales	Review order resetting scheduling conference for 11:15am	400.00 hr	0.10	0.10	40.00
12/03/2019	Hernandez, Kayla	State Road Auto Sales	Review & notate case materials in prep for scheduling conference	400.00 hr	1.30	1.30	520.00
12/03/2019	Hernandez, Kayla	State Road Auto Sales	Attend scheduling conference by telephone	400.00 hr	0.40	0.40	160.00
12/03/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ K. Crick following scheduling conference	400.00 hr	0.20	0.20	80.00

12/03/2019	Hernandez, Kayla	State Road Auto Sales	Review and prepare NOT of appearance	400.00 hr	0.40	0.40	160.00
12/09/2019	Hernandez, Kayla	State Road Auto Sales	Review notice of assignment to Judge Kelley for ADR	400.00 hr	0.10	0.10	40.00
12/09/2019	Hernandez, Kayla	State Road Auto Sales	Review filing of re-filed Joint Stmt and Proposed Pretrial Schedule w/ fully executed LR 16.1 cert.	400.00 hr	0.10	0.10	40.00
12/09/2019	Hernandez, Kayla	State Road Auto Sales	Review order of reference for alternative dispute resolution	400.00 hr	0.10	0.10	40.00
12/19/2019	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client w/ case update	400.00 hr	0.10	0.10	40.00
12/26/2019	Hernandez, Kayla	State Road Auto Sales	Review pleadings, then research & preparing Pltff's initial disclosures	400.00 hr	0.70	0.70	280.00
01/02/2020	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client w/ case update	400.00 hr	0.30	0.30	120.00
01/02/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ C. Oliver re: client lease issue	400.00 hr	0.10	0.10	40.00
01/03/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ P. Matthews re: case update	400.00 hr	0.10	0.10	40.00
01/03/2020	Hernandez, Kayla	State Road Auto Sales	Phone call w/ P. Matthews to discuss possible class resolution (.4); correspondence w/ P. Matthews re: same (.1)	400.00 hr	0.50	0.50	200.00
01/06/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ K. Crick w/ case update	400.00 hr	0.10	0.10	40.00
01/06/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ client re: case update	400.00 hr	0.10	0.10	40.00
01/06/2020	Hernandez, Kayla	State Road Auto Sales	Revise Pltff's draft initial disclosures, per JLD edits	400.00 hr	0.10	0.10	40.00
01/06/2020	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss possible resolution	400.00 hr	0.40	0.40	160.00
01/06/2020	Hernandez, Kayla	State Road Auto Sales	Strategy discussion w/ JLD re: lit. and possible settlement	400.00 hr	0.40	0.40	160.00
01/06/2020	Hernandez, Kayla	State Road Auto Sales	Phone call w/ P. Matthews re: possible resolution	400.00 hr	0.10	0.10	40.00
01/06/2020	Hernandez, Kayla	State Road Auto Sales	Phone call w/ P. Matthews re: possible class resolution	400.00 hr	0.20	0.20	80.00
01/06/2020	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss possible resolution	400.00 hr	0.50	0.50	200.00
01/07/2020	Hernandez, Kayla	State Road Auto Sales	Review correspondence from client re: settlement	400.00 hr	0.10	0.10	40.00
01/07/2020	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss possible settlement terms	400.00 hr	0.50	0.50	200.00
01/08/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence w/ client re: lease issues	400.00 hr	0.10	0.10	40.00
01/08/2020	Hernandez, Kayla	State Road Auto Sales	Phone call w/ P. Matthews to discuss possible class resolution	400.00 hr	0.50	0.50	200.00
01/09/2020	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss settlement negotiations	400.00 hr	0.20	0.20	80.00
01/10/2020	Hernandez, Kayla	State Road Auto Sales	Phone call w/ P. Matthews to discuss class settlement negotiations	400.00 hr	0.20	0.20	80.00
01/13/2020	Hernandez, Kayla	State Road Auto Sales	Phone call w/ client to discuss settlement	400.00 hr	0.20	0.20	80.00
01/13/2020	Hernandez, Kayla	State Road Auto Sales	Phone call w/ P. Matthews to discuss possible class resolution	400.00 hr	0.30	0.30	120.00
01/13/2020	Hernandez, Kayla	State Road Auto Sales	Review NOT of appearance for P. Matthews	400.00 hr	0.10	0.10	40.00

01/14/2020	Hernandez, Kayla	State Road Auto Sales	Phone call with client to discuss settlement w/ client	400.00 hr	0.10	0.10	40.00
01/14/2020	Hernandez, Kayla	State Road Auto Sales	Phone call w/ P. Matthews re: class settlement (.1); correspondence w/ P. Matthews re: same (.2)	400.00 hr	0.30	0.30	120.00
01/14/2020	Hernandez, Kayla	State Road Auto Sales	Review order setting settlement conference with Judge Kelley, and attention to calendar for relevant deadlines	400.00 hr	0.20	0.20	80.00
01/14/2020	Hernandez, Kayla	State Road Auto Sales	Research and prepare draft of class action settlement agreement, proposed direct mail class notice, proposed long-form class notice for class counsel's website, and proposed preliminary approval order	400.00 hr	4.10	4.10	1,640.00
01/15/2020	Hernandez, Kayla	State Road Auto Sales	Continue researching and preparing draft class action settlement, proposed preliminary approval order, and proposed final approval order	400.00 hr	1.60	1.60	640.00
01/15/2020	Hernandez, Kayla	State Road Auto Sales	Settlement correspondence with P. Matthews	400.00 hr	0.20	0.20	80.00
01/15/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with K. Crick re: class settlement	400.00 hr	0.10	0.10	40.00
01/15/2020	Hernandez, Kayla	State Road Auto Sales	Revise draft class action settlement agreement and related exhibits, per JLD edits (.5); strategy correspondence w/ JLD re: same (.1)	400.00 hr	0.60	0.60	240.00
01/16/2020	Hernandez, Kayla	State Road Auto Sales	Finalize drafts of class settlement agreement, direct mail class notice, long-form class notice, and proposed preliminary and final approval orders (.5), and correspondence with P. Matthews re: same (.1)	400.00 hr	0.60	0.60	240.00
01/23/2020	Hernandez, Kayla	State Road Auto Sales	Review settlement correspondence from P. Matthews	400.00 hr	0.10	0.10	40.00
01/23/2020	Hernandez, Kayla	State Road Auto Sales	Review P. Matthews' revisions to class settlement materials (agreement, proposed notices, proposed approval orders), and make further revisions to latest drafts of same.	400.00 hr	1.80	1.80	720.00
01/29/2020	Hernandez, Kayla	State Road Auto Sales	Discussion with JD re: edits to class settlement agreement	400.00 hr	0.20	0.20	80.00
02/04/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with P. Matthews re: settlement agreement	400.00 hr	0.10	0.10	40.00
02/05/2020	Hernandez, Kayla	State Road Auto Sales	Discussion with litigation team re: class settlement agreement edits	400.00 hr	0.10	0.10	40.00
02/07/2020	Hernandez, Kayla	State Road Auto Sales	Phone call with client to discuss settlement agreement	400.00 hr	0.10	0.10	40.00
02/11/2020	Hernandez, Kayla	State Road Auto Sales	Begin researching Plaintiff's motion for preliminary approval of class settlement	400.00 hr	0.70	0.70	280.00
02/11/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with P. Matthews re: settlement materials	400.00 hr	0.10	0.10	40.00
02/12/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with defense counsel re: settlement agreement	400.00 hr	0.10	0.10	40.00
02/17/2020	Hernandez, Kayla	State Road Auto Sales	Research and prepare Plaintiff's unopposed motion for preliminary approval of class action settlement	400.00 hr	3.80	3.80	1,520.00
02/18/2020	Hernandez, Kayla	State Road Auto Sales	Settlement correspondence with defense counsel	400.00 hr	0.10	0.10	40.00
02/18/2020	Hernandez, Kayla	State Road Auto Sales	Continue researching & preparing Plaintiff's motion for preliminary approval of class action settlement	400.00 hr	1.70	1.70	680.00
02/24/2020	Hernandez, Kayla	State Road Auto Sales	Review suggested release language from defense counsel re: Plaintiff's AG complaint, and revise same (.4); correspondence with lit. team re: same (.2)	400.00 hr	0.60	0.60	240.00
02/24/2020	Hernandez, Kayla	State Road Auto Sales	Continue researching and preparing Plaintiff's motion for preliminary approval of class settlement	400.00 hr	0.80	0.80	320.00
02/25/2020	Hernandez, Kayla	State Road Auto Sales	Revise and finalize latest drafts of class settlement agreement, proposed preliminary and final approval orders, and proposed direct mail and long-form class notices, per additional negotiation with defense counsel (1.2); correspondence with defense counsel re: same (.1)	400.00 hr	1.30	1.30	520.00
03/02/2020	Hernandez, Kayla	State Road Auto Sales	Phone call with client to discuss settlement agreement (.3); correspondence with client with agreement (.1)	400.00 hr	0.40	0.40	160.00

03/02/2020	Hernandez, Kayla	State Road Auto Sales	Review correspondence with defense counsel re: settlement agreement	400.00 hr	0.10	0.10	40.00
03/03/2020	Hernandez, Kayla	State Road Auto Sales	Review correspondence from defense counsel re: settlement agreement	400.00 hr	0.10	0.10	40.00
03/16/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with defense counsel re: settlement agreement	400.00 hr	0.10	0.10	40.00
03/17/2020	Hernandez, Kayla	State Road Auto Sales	Phone call with client re: settlement agreement (.2); correspondence with client re: same (.1)	400.00 hr	0.30	0.30	120.00
03/17/2020	Hernandez, Kayla	State Road Auto Sales	Continue researching and preparing Plaintiff's unopposed motion for preliminary approval of class action settlement, and counsel's declaration in support of motion	400.00 hr	5.70	5.70	2,280.00
03/18/2020	Hernandez, Kayla	State Road Auto Sales	Phone call with client to discuss settlement agreement	400.00 hr	0.10	0.10	40.00
03/18/2020	Hernandez, Kayla	State Road Auto Sales	Revise latest draft of Plaintiff's preliminary approval motion and counsel's supporting declaration, per JD edits (.2); correspondence with defense counsel re: motion (.1)	400.00 hr	0.30	0.30	120.00
03/19/2020	Hernandez, Kayla	State Road Auto Sales	Phone call with client to discuss settlement agreement and preliminary approval motion	400.00 hr	0.20	0.20	80.00
03/19/2020	Hernandez, Kayla	State Road Auto Sales	Attention to fully executed copy of settlement agreement with all supporting materials (.4); correspondence with defense counsel re: same (.1)	400.00 hr	0.50	0.50	200.00
03/20/2020	Hernandez, Kayla	State Road Auto Sales	Review 4th Cir. decision in Baehr rejecting plaintiffs' standing to bring claims based on alleged kickback scheme	400.00 hr	0.30	0.30	120.00
03/23/2020	Hernandez, Kayla	State Road Auto Sales	Settlement strategy with JLD re client vehicle.	400.00 hr	0.20	0.20	80.00
03/23/2020	Hernandez, Kayla	State Road Auto Sales	Phone call with client to discuss settlement agreement	400.00 hr	0.10	0.10	40.00
03/24/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with defense counsel re: preliminary approval motion	400.00 hr	0.10	0.10	40.00
03/25/2020	Hernandez, Kayla	State Road Auto Sales	Phone call with defense counsel to discuss class settlement agreement and preliminary approval motion	400.00 hr	0.30	0.30	120.00
03/25/2020	Hernandez, Kayla	State Road Auto Sales	Phone call with client to discuss settlement agreement	400.00 hr	0.10	0.10	40.00
03/25/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with defense counsel re: preliminary approval motion and administration	400.00 hr	0.20	0.20	80.00
03/25/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with class administrator re: notice program	400.00 hr	0.10	0.10	40.00
03/26/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with defense counsel re: preliminary approval motion and return of client's car	400.00 hr	0.20	0.20	80.00
03/26/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with client re: car	400.00 hr	0.10	0.10	40.00
03/26/2020	Hernandez, Kayla	State Road Auto Sales	Review and finalize final draft of Plaintiff's unopposed motion for preliminary approval of class settlement, counsel's supporting declaration, and all supporting class settlement materials	400.00 hr	1.30	1.30	520.00
03/27/2020	Hernandez, Kayla	State Road Auto Sales	Phone call with defense counsel re: class list, notice mailing, and CAFA notice	400.00 hr	0.40	0.40	160.00
03/27/2020	Hernandez, Kayla	State Road Auto Sales	Phone call with defense counsel to discuss CAFA notice	400.00 hr	0.10	0.10	40.00
03/31/2020	Hernandez, Kayla	State Road Auto Sales	Review order for delivery of courtesy copies of Plaintiff's preliminary approval motion	400.00 hr	0.10	0.10	40.00
04/01/2020	Hernandez, Kayla	State Road Auto Sales	Courtesy copies of Plaintiff's preliminary approval motion	0.00 ea	0.00	14.23	14.23
04/07/2020	Hernandez, Kayla	State Road Auto Sales	Review filing of notice of appearance by J. Rodrigues	400.00 hr	0.10	0.10	40.00
05/07/2020	Hernandez, Kayla	State Road Auto Sales	Phone call with client re: car return	400.00 hr	0.50	0.50	200.00

05/07/2020	Hernandez, Kayla	State Road Auto Sales	Review correspondence with defense counsel re: vehicle return	400.00 hr	0.10	0.10	40.00
05/08/2020	Hernandez, Kayla	State Road Auto Sales	Phone call with client re: vehicle	400.00 hr	0.10	0.10	40.00
05/08/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with defense counsel re: vehicle return	400.00 hr	0.10	0.10	40.00
05/14/2020	Hernandez, Kayla	State Road Auto Sales	Phone call with K. Crick re: client's car return	400.00 hr	0.10	0.10	40.00
05/14/2020	Hernandez, Kayla	State Road Auto Sales	Review correspondence from defense counsel (.1), and phone call with defense counsel to discuss return of car (.2)	400.00 hr	0.30	0.30	120.00
05/21/2020	Hernandez, Kayla	State Road Auto Sales	Discussion with JD re: preliminary approval motion	400.00 hr	0.20	0.20	80.00
07/08/2020	Hernandez, Kayla	State Road Auto Sales	Review order canceling class certification motion hearing	400.00 hr	0.10	0.10	40.00
07/30/2020	Hernandez, Kayla	State Road Auto Sales	Research and prepare notice of supplemental authority in support of Plaintiff's preliminary approval motion	400.00 hr	0.50	0.50	200.00
07/30/2020	Hernandez, Kayla	State Road Auto Sales	Discussion with JD re: filing of supplemental authority	400.00 hr	0.10	0.10	40.00
07/30/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with defense counsel re: filing of supplemental authority	400.00 hr	0.10	0.10	40.00
08/03/2020	Hernandez, Kayla	State Road Auto Sales	Research and prepare unopposed motion for leave to submit supplemental authority in support of Plaintiff's preliminary approval motion (.7); correspondence with defense counsel re: same (.1)	400.00 hr	0.80	0.80	320.00
08/03/2020	Hernandez, Kayla	State Road Auto Sales	Finalize Plaintiff's motion for leave to file supplemental authority in support of preliminary approval	400.00 hr	0.20	0.20	80.00
08/04/2020	Hernandez, Kayla	State Road Auto Sales	Review order authorizing filing of supplemental authority (.1); then prepare and finalize notice of supplemental authority to submit Danger v. Nextep in further support of Plaintiff's preliminary approval motion (.2)	400.00 hr	0.30	0.30	120.00
08/18/2020	Hernandez, Kayla	State Road Auto Sales	Review preliminary approval order.	400.00 hr	0.10	0.10	40.00
08/18/2020	Hernandez, Kayla	State Road Auto Sales	Review order cancelling mediation hearing and telephone call	400.00 hr	0.10	0.10	40.00
08/18/2020	Hernandez, Kayla	State Road Auto Sales	Finalize postcard class notice with applicable deadlines (.2); correspondence with administrator and defense counsel re: same (.1)	400.00 hr	0.30	0.30	120.00
08/18/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with client re: preliminary approval order	400.00 hr	0.10	0.10	40.00
08/19/2020	Hernandez, Kayla	State Road Auto Sales	Review correspondence from client re: class notice	400.00 hr	0.10	0.10	40.00
08/19/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with defense counsel, administrator re: class notice campaign	400.00 hr	0.20	0.20	80.00
08/20/2020	Hernandez, Kayla	State Road Auto Sales	Phone call with defense counsel to discuss class notice and CAFA notice	400.00 hr	0.30	0.30	120.00
08/21/2020	Hernandez, Kayla	State Road Auto Sales	Review sample class notice and CAFA notice details from administrator (.4), and correspondence with administrator and defense counsel re: same (.1)	400.00 hr	0.50	0.50	200.00
08/21/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with administrator re: claim form for Plaintiff	400.00 hr	0.10	0.10	40.00
08/24/2020	Hernandez, Kayla	State Road Auto Sales	Review correspondence from claims administrator	400.00 hr	0.10	0.10	40.00
08/27/2020	Hernandez, Kayla	State Road Auto Sales	Finalize long-form class notice and other materials for settlement website (.6); discussion with JD re: same (.2)	400.00 hr	0.80	0.80	320.00
08/31/2020	Hernandez, Kayla	State Road Auto Sales	Review correspondence from administrator re: class notice campaign	400.00 hr	0.10	0.10	40.00
09/09/2020	Hernandez, Kayla	State Road Auto Sales	Review class notice update from administrator	400.00 hr	0.10	0.10	40.00

09/09/2020	Hernandez, Kayla	State Road Auto Sales	Responded to JLD's motion for summary judgment over Plaintiff's petition	400.00 hr	0.10		40.00
09/10/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with defense counsel	400.00 hr	0.10	0.10	40.00
09/11/2020	Hernandez, Kayla	State Road Auto Sales	Begin researching and preparing Plaintiff's motion for approval of an incentive award and attorneys' fee award	400.00 hr	2.70	2.70	1,080.00
09/16/2020	Hernandez, Kayla	State Road Auto Sales	Review notice of withdrawal of J. Rodrigues for Defendant	400.00 hr	0.10	0.10	40.00
09/16/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with defense counsel re: Plaintiff's fee petition	400.00 hr	0.10	0.10	40.00
09/17/2020	Hernandez, Kayla	State Road Auto Sales	Research and prepare Plaintiff's fee petition	400.00 hr	2.30	2.30	920.00
09/17/2020	Hernandez, Kayla	State Road Auto Sales	Discussion with JD re: Plaintiff's fee petition	400.00 hr	0.20	0.20	80.00
09/18/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with settlement administrator	400.00 hr	0.10	0.10	40.00
09/18/2020	Hernandez, Kayla	State Road Auto Sales	Continue researching and preparing Plaintiff's motion for approval of incentive and fee awards, and counsel's supporting declaration	400.00 hr	2.80	2.80	1,120.00
09/21/2020	Hernandez, Kayla	State Road Auto Sales	Research and prepare Plaintiff's fee petition and counsel's supporting declaration	400.00 hr	1.10	1.10	440.00
09/22/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with defense counsel re: Plaintiff's fee petition	400.00 hr	0.10	0.10	40.00
09/22/2020	Hernandez, Kayla	State Road Auto Sales	Research and prepare Plaintiff's motion for approval of an incentive award and an award of attorneys' fees, costs, and expenses, and counsel's supporting declaration	400.00 hr	5.80	5.80	2,320.00
09/23/2020	Hernandez, Kayla	State Road Auto Sales	Research and prepare Plaintiff's motion for approval of incentive and fee awards, and counsel's supporting declaration	400.00 hr	5.70	5.70	2,280.00
09/24/2020	Hernandez, Kayla	State Road Auto Sales	Continue researching and preparing Plaintiff's motion for approval of an incentive award and fee award, counsel's supporting declaration, and proposed order granting motion	400.00 hr	3.70	3.70	1,480.00
09/24/2020	Hernandez, Kayla	State Road Auto Sales	Revise latest draft of Plaintiff's motion for approval of incentive award and fee award, per JLD edits and commentary	400.00 hr	0.60	0.60	240.00
09/28/2020	Hernandez, Kayla	State Road Auto Sales	Revise latest draft of proposed order on Plaintiff's fee petition, per JLD edits	400.00 hr	0.20	0.20	80.00
09/28/2020	Hernandez, Kayla	State Road Auto Sales	Correspondence with administrator re: receipt of objections or exclusions	400.00 hr	0.10	0.10	40.00
09/28/2020	Hernandez, Kayla	State Road Auto Sales	Review time records supporting Plaintiff's fee petition	400.00 hr	0.40	0.40	160.00
09/28/2020	Hernandez, Kayla	State Road Auto Sales	Review and finalize latest drafts of Plaintiff's motion for approval of incentive award and award of attorneys' fees and expenses, counsel's supporting declaration, and proposed order approving awards	400.00 hr	2.20	2.20	880.00

Total Labor For Jesse Johnson	123.70	122.00	48,800.00
Total Expense For Jesse Johnson		664.23	664.23
Total For Jesse Johnson			49,464.23

Grand Total Labor	137.70	135.10	54,695.00
Grand Total Expenses		664.23	664.23
Grand Total			55,359.23

Total Times for All Currencies:	137.70	135.10	
---------------------------------	--------	--------	--