

Jonathan M. Rotter (SBN 234137)
GLANCY PRONGAY & MURRAY LLP
1925 Century Park East, Suite 2100
Los Angeles, California 90067
Telephone: (310) 201-9150
Facsimile: (310) 432-1495
Email: info@glancylaw.com

Carl L. Stine (*pro hac vice*)
Matthew Insley-Pruitt (*pro hac vice*)
Philip M. Black (SBN 308619)
WOLF POPPER LLP
845 Third Avenue
New York, NY 10022
Telephone: (212) 759-4600
Facsimile: (212) 486-2093
Email: cstine@wolfpopper.com

Attorneys for Plaintiff and the Proposed Class

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHARAE CASEY, Individually
and on Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

DOCTOR’S BEST, INC.,

Defendant.

)
) Case No.: 8:20-cv-01325-JLS-JDE

)
) **DECLARATION OF MATTHEW**
) **INSLEY-PRUITT IN SUPPORT**
) **OF UNOPPOSED MOTION FOR**
) **CLASS CERTIFICATION; FINAL**
) **APPROVAL OF SETTLEMENT;**
) **AWARD OF INCENTIVE**
) **PAYMENT; AND AWARD OF**
) **ATTORNEYS’ FEES, COSTS,**
) **AND EXPENSES**

)
) Date: July 8, 2022
) Time: 10:30 a.m.
) Courtroom: 10A
)

1 I, MATTHEW INSLEY-PRUITT, declare as follows pursuant to 28 U.S.C.
2 § 1746:

3 1. I am a member of the bar of the State of New York and am admitted
4 to practice before this Court *pro hac vice*. I am a partner at Wolf Popper LLP,
5 counsel for Plaintiff in this matter. I make this declaration in support of Plaintiff's
6 Unopposed Motion for Class Certification; Final Approval of Settlement; Award
7 of Incentive Payment; and Award of Attorneys' Fees, Costs, And Expenses.

8 2. I previously submitted the biography of Wolf Popper LLP and the
9 individual attorneys who have participated in this matter. ECF No. 44-A.

10 3. Zhu Gui, Esq. is an attorney who practices in China and who has
11 assisted counsel in New York and California with this action. Zhu Gui did a
12 substantial amount of pre-complaint investigation of the entire glucosamine
13 industry including major retailers in the United States and Canada, including Dr.'s
14 Best. He also has assisted in developing legal arguments and litigation strategies
15 during this and other litigations contesting the authenticity of dietary supplements
16 labeled as containing glucosamine sulfate.¹

17 4. During the course of settlement discussions and in advance of the April
18 2021 mediation, as well as after the settlement was reached, Defendant provided
19 confidential sales figures for the relevant products starting from the beginning of the
20 Class Period. Relevant figures were summarized in my prior declaration submitted
21

22
23 ¹ Zhu Gui has informed counsel that he is concerned about his and his family's
24 health and safety if certain identifying information is publicly available. As such,
25 his full curriculum vitae is available for in camera review if the Court requests it.
26
27

1 on January 28, 2022. ECF No. 44-3. In addition, during the Class Period, Defendant
2 sold approximately 1.5 million units of the products on a wholesale basis.

3 5. During the course of the action, my firm has actively and expediently
4 litigated this case, including by:

- 5 a. undertaking a factual and legal investigation into Plaintiff's
- 6 allegations, prior to filing the Complaint;
- 7 b. drafting and filing the Complaint;
- 8 c. conducting legal research and drafting opposing brief in response to
- 9 Defendant's Motion to Dismiss;
- 10 d. telephone conferences, videoconference, and e-mail correspondence
- 11 with other members of Plaintiffs' Counsel and Plaintiff;
- 12 e. telephone conferences and e-mail correspondence with Defendants;
- 13 f. comprehensive settlement negotiations, including mediation;
- 14 g. drafting and negotiation over the terms of the Settlement and the
- 15 Settlement Agreement;
- 16 h. preparing the papers in support of preliminary approval of the
- 17 settlement and presenting it to the Court at the preliminary approval
- 18 hearing;
- 19 i. oversight of the notice and claims process, including regular contact
- 20 with the claim administrator;
- 21 j. issuance of subpoenas to retailers;
- 22 k. communication with hundreds of class members regarding the claims
- 23 process; and
- 24 l. preparing the motion for final approval of the Settlement.

1 6. I expect that my firm will continue to litigate this case after the
2 submission of this declaration. For example, I and my firm will continue to oversee
3 the claims process, including reviewing decisions regarding whether a claim
4 submission is sufficient. We will also likely to continue to receive questions from
5 Class members regarding the Settlement and how to submit their claims. My Firm
6 will also prepare updates to the Court, as needed, regarding the claims process. In
7 the event that Class members file an objection to the Settlement, we will prepare a
8 timely response. We will also prepare for and attend the Final Approval Hearing on
9 July 8, 2022, and respond to any further requests that the Court may have. Finally,
10 in the unlikely event that an objector brings an appeal, we will continue to represent
11 the Class and enforce the terms of the Settlement on appeal. None of this activity is
12 reflected in the time records detailed below.

13 7. One of the continuing tasks has been to oversee the notice campaign
14 and the issuance of subpoenas to retailers. Specifically, Vitacost refused to provide
15 email addresses of its online purchasers in response to the subpoena on the basis that
16 such activity would be beyond the scope of the user agreement covering the
17 collection of these emails. Upon further discussion with counsel for Defendant, it
18 appears that this retailer only accounted for roughly 3-4% of total sales of the
19 Products during the Class Period, and the best estimates were that Vitacost would
20 only provide roughly 11,000 emails based on an analysis of other retailer data.
21 Counsel also discussed with the Claims Administrator the likelihood that Vitacost's
22 email list would include customers who purchased the Product from other retailers
23 that did provide email information (and thus received direct notice), as well as
24 whether it would be feasible to conduct a targeted indirect notice campaign online
25 to reach these consumers. Given the low percentage of emails, the otherwise robust
26
27

1 online publication notice, and the inability to specifically reach these consumers,
2 Plaintiff's Counsel determined that it would cause unnecessary delay to take judicial
3 action to enforce the subpoena.

4 **PLAINTIFFS' FEE APPLICATION IS FAIR AND REASONABLE**

5 8. As set forth in Plaintiff's memorandum, an award of attorneys' fees is
6 authorized and appropriate here, and the requested fee is more than reasonable.

7 9. The Settlement Agreement directs that any fee award will be paid by
8 Defendant rather than coming out of the Settlement Class members' pockets.
9 Defendants have agreed that they will not contest paying Plaintiff's reasonable
10 attorneys' fees, inclusive of expenses, up to the \$475,000 amount sought in the Fee
11 Application ("Fee Award"). Settlement Agreement ¶ 7.1.

12 10. Plaintiff indicated that she supports Plaintiffs' Counsel's Fee
13 Application.

14 11. The table included below is a summary indicating the amount of time
15 spent by attorneys and professional support staff of my Firm who were involved in
16 this Action. The schedule was prepared from contemporaneous daily time records
17 regularly prepared and maintained by Wolf Popper. Time expended on the Fee
18 Application has been excluded. In the exercise of billing judgment, only the hours
19 of attorneys who are admitted to practice in the State of California, admitted *pro hac*
20 *vice* in this matter, or worked under the supervision of such lawyers are included
21 here.² In addition, timekeepers who contributed fewer than ten hours to this matter
22 or who assisted as student interns have been removed.

23 _____
24 ² While he made significant contributions to the origination of the case and consulted
25 with respect to legal issues in this case, Mr. Zhu Gui's time is not included here.
26 While I believe that the Fee Application is sufficiently supported by the combined
27 _____

| Timekeeper | Role | Hours | Rate | Amount |
|--------------------------|-------------|--------------|-------------|---------------|
| Carl L. Stine | Sr. Partner | 99.2 | \$895.00 | \$88,784.00 |
| Matthew Insley-Pruitt | Partner | 108.4 | \$825.00 | \$89,430.00 |
| Philip M. Black | Associate | 106.2 | \$475.00 | \$50,445.00 |
| Melissa Gianfagna | Paralegal | 16.0 | \$320.00 | \$5,120.00 |
| Total: | | 329.8 | | \$233,779.00 |

12. A chart containing detailed billing entries is attached as Exhibit A. Pursuant to the Court's practices, an Excel version of the same information will also be sent to Chambers by email.

13. As detailed in the chart above and Exhibit A, Wolf Popper spent an aggregate of 329.8 hours on behalf of the Settlement Class, for a lodestar of \$233,799.00.

14. The hourly rates for the attorneys and professional support staff of my Firm included are the same as the regular rates charged for their services in non-contingent matters and/or which have been accepted in other complex or class action litigation. My firm undertook this matter on a purely contingent basis.

lodestar of my Firm and Glancy Prongay & Murray LLP, it would be even stronger when considering Mr. Zhu Gui's contributions.

1 15. These rates are comparable to the rates of other attorneys engaging in
2 complex consumer protection class action litigation. The reasonableness of these
3 rates is supported by the fact that Plaintiffs' Counsel have extensive experience in
4 prosecuting complex class action litigation, and that courts have approved similar
5 past fee requests by Plaintiffs' Counsel, including consumer class actions,
6 proceeding in the Ninth Circuit. *See, e.g., Bozarth v. Envision Healthcare Corp., et*
7 *al.*, No. ED CV 17-1935 FMO (SHKx), 2020 U.S. Dist. LEXIS 117294 (C.D. Cal.
8 June 30, 2020) (awarding the requested \$1.85 million in attorneys' fees and costs,
9 finding the requested fee award fair, reasonable, and appropriate given the "work
10 performed in this action and the prevailing rates in the community for lawyers of
11 comparable skill, experience, and reputation"); *see also Belfiore v. Procter &*
12 *Gamble Co.*, Case 2:14-cv-04090-PKC-RML, Order Granting Final Approval of
13 Class Action Settlement (E.D.N.Y. July 27, 2020) (ECF No. 361) and Plaintiff's
14 Memorandum of Law in Support of Unopposed Motion for Final Approval of Class
15 Action Settlement, Award of Attorneys' Fees, Reimbursement of Out-of-Pocket
16 Expenses, and Class Representative Payment, dated June 11, 2020 (ECF No. 358)
17 (awarding in full the requested \$3.2 million in attorneys' fees, costs, and expenses,
18 including work performed by Mr. Insley-Pruitt); *Copher et al. v. Bank of America,*
19 *N.A. et al.*, Case 5:13-cv-00353-M (W.D. Ok.), Final Order and Judgment, dated
20 June 2, 2016 (ECF No. 111) and Plaintiffs' Joint Declaration in Support of Motion
21 for Final Approval, dated April 12, 2016 (ECF No. 103) (awarding \$1.875 million
22 for legal fees in consumer class action regarding residential mortgage servicing that
23 settled before any dispositive motion was filed, accepting without comment the
24 reasonableness of Wolf Popper's standard hourly rates used in the lodestar
25 calculation, including the work performed by Mr. Insley-Pruitt).

1 16. These hourly rates are also consistent with rates that have been accepted
 2 from attorneys in other actions in the Ninth Circuit. *See, e.g., Hurtado v. Rainbow*
 3 *Disposal Co.*, Case No.: 8:17-cv-01605-JLS-DFM, 2021 U.S. Dist. LEXIS 105692,
 4 at *19 (C.D. Cal. May 21, 2021) (the Court approved one of Class Counsel’s hourly
 5 rates of \$900 per hour and the second Class Counsel’s hourly rates of \$800 per hour,
 6 and rates between \$260 and \$600 per hour billed for work performed by paralegals
 7 and non-partner level attorneys.); *Defrees*, 2018 U.S. Dist. LEXIS 125462 at *15
 8 (approving fees up to \$965 for partners); *G. F. v. Contra Costa Cnty.*, Case No. 13-
 9 cv-03667-MEJ, 2015 U.S. Dist. LEXIS 159597, at *38-41 (N.D. Cal. Nov. 25, 2015)
 10 (the Court approved an hourly rate of \$845-\$975 for two of the “most senior and
 11 experienced litigators,” hourly rates between \$210 and \$700 for attorneys, and
 12 hourly rates ranging from \$175 and \$340 for non-attorneys.”); *Sherman v. Clp Res.*,
 13 CV 12-8080-GW-PLAx, 2020 U.S. Dist. LEXIS 152477, at *7 (C.D. Cal Aug. 6,
 14 2020) (the Court found Class Counsel’s hourly rates of \$210 per hour, for law clerks
 15 and paralegals, to \$895 per hour for the Attorney to be reasonable).

16 17. The Declaration of Jonathan Rotter, submitted together with this
 17 motion, includes the lodestar of the Glancy Prongay & Murray LLP firm.
 18 Combining the lodestars of the two firms results in the following aggregate lodestar:

| Firm | Hours | Lodestar |
|-----------------|-------|--------------|
| Wolf Popper LLP | 329.8 | \$233,779.00 |
| Glancy Prongay | 117.8 | \$72,095.00 |
| Total: | 447.6 | \$305,874.00 |

PLAINTIFFS' EXPENSES

18. The Settlement Agreement provides for a Fee Application that includes expenses. Therefore, Plaintiff's Counsel's expenses advanced to prosecute this Action are part of, and not in addition to, their application for the \$475,000.

19. The components of my Firm's expenses are detailed in the table below:

| Category | Expense |
|--|--------------------|
| Experts | \$1,000.00 |
| Court fees | \$178.40 |
| Office Expenses (postage, telephone, photocopying) | \$84.69 |
| Travel | \$1,500.00 |
| Legal research | \$2,919.01 |
| Mediation | \$7,950.00 |
| Total: | \$13,632.10 |

20. Wolf Popper's expenses are reflected on the books and records of my Firm. It is the Firm's policy and practice to prepare such records from expense vouchers, check records, credit card records, and other source materials. Based on my oversight of the Action and my review of these records, I believe them to be an accurate record of the expenses actually incurred by my Firm in connection with this Action. The charges for payments made to vendors, such as telephone, mail, Pacer, Westlaw, and LEXIS, reflect only out-of-pocket payments to the vendors. Online

1 research is billed based on actual usage at a set charge by the vendor. There are no
2 administrative or other charges added to these figures by my Firm.

3 21. Plaintiff’s Counsel have incurred an aggregate of \$16,630.21 in
4 unreimbursed expenses prosecuting this case. In my judgment, these modest
5 expenses were reasonable and necessary, and expended for the benefit of the Class
6 in this Action. The firms’ unreimbursed expenses are:

| Firm | Expenses |
|-----------------------------|-------------|
| Wolf Popper LLP | \$13,632.10 |
| Glancy Prongay & Murray LLP | \$2,998.11 |
| Total Expenses | \$16,630.21 |

7
8
9
10
11
12
13
14
15 22. I conferred with Defendant’s counsel over email, and we agreed that
16 any remaining funds from the Settlement Agreement should be directed to the
17 Arthritis National Research Foundation (“ANRF”) as a *cy pres* recipient. As
18 described on the ANRF website, ANRF is a 501(c)(3) nonprofit that, since 1970,
19 “has funded arthritis research to understand the causes, prevention and development
20 of new treatments for osteoarthritis, rheumatoid arthritis, lupus, juvenile arthritis and
21 related autoimmune diseases.” <https://curearthritis.org/about-anrf/>. As such, ANRF
22 is aligned with the interests of the Class members since Glucosamine Sulfate
23 products are often taken by consumers who suffer from osteoarthritis. ANRF
24 currently has an “Exceptional” rating on the charity evaluation website Charity
25
26
27

1 Navigator. <https://www.charitynavigator.org/ein/956043953>. I am not aware of any
2 relationship between ANRF or any member of my Firm.

3 23. Based on my and Wolf Popper's significant experience in class action
4 litigation, I believe that the settlement presented to the Court is fair, reasonable, and
5 adequate.

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

7 Executed this 20th day of May, 2022, at New York, New York.

8
9
10 

11 _____
12 Matthew Insley-Pruitt

EXHIBIT A

| Date | Timekeeper | Task Description | Hourly Rate | Hours Worked | Fee (Hourly Rate x Hours Worked) |
|-----------|------------------|--|-------------|--------------|----------------------------------|
| 3/16/2020 | Carl L. Stine | Research re: possible case, Doctors Best, email with potential client | \$ 895.00 | 1.3 | \$ 1,163.50 |
| 6/9/2020 | Carl L. Stine | Tel re lab and sending sample, send sample to lab | \$ 895.00 | 1.2 | \$ 1,074.00 |
| 6/20/2020 | Philip M. Black | Internal emails re drafting complaint | \$ 475.00 | 0.1 | \$ 47.50 |
| 6/20/2020 | Carl L. Stine | Review client emails and email to team re drafting complaint | \$ 895.00 | 0.5 | \$ 447.50 |
| 6/22/2020 | Carl L. Stine | Email to Zhu Gui re: status | \$ 895.00 | 0.2 | \$ 179.00 |
| 6/23/2020 | Philip M. Black | Reviewing corresp. and researching facts for purposes of complaint. | \$ 475.00 | 2.0 | \$ 950.00 |
| 6/24/2020 | Philip M. Black | CAFA jurisdiction research. | \$ 475.00 | 0.5 | \$ 237.50 |
| 6/24/2020 | Carl L. Stine | Preliminary review of intern's research memo, emails re: same | \$ 895.00 | 0.8 | \$ 716.00 |
| 6/26/2020 | Philip M. Black | Research on potential claims against additional defendant | \$ 475.00 | 0.8 | \$ 380.00 |
| 6/29/2020 | Philip M. Black | Research on potential claims against additional defendant | \$ 475.00 | 2.0 | \$ 950.00 |
| 6/30/2020 | Philip M. Black | CAFA jurisdictional research. | \$ 475.00 | 7.5 | \$ 3,562.50 |
| 7/1/2020 | Philip M. Black | Additional defendant research | \$ 475.00 | 2.0 | \$ 950.00 |
| 7/1/2020 | Philip M. Black | Drafting complaint | \$ 475.00 | 6.5 | \$ 3,087.50 |
| 7/1/2020 | Carl L. Stine | read intern memo & case re potential defendant & email re same. | \$ 895.00 | 2.0 | \$ 1,790.00 |
| 7/2/2020 | Philip M. Black | Further research and edits to complaint. | \$ 475.00 | 2.5 | \$ 1,187.50 |
| 7/2/2020 | Carl L. Stine | Emails w/client re factual issues. | \$ 895.00 | 0.5 | \$ 447.50 |
| 7/2/2020 | Carl L. Stine | Emails w/client; draft & send her engagement letter. | \$ 895.00 | 1.0 | \$ 895.00 |
| 7/7/2020 | Philip M. Black | Research on breach of warranty notice and breach of contract claims. | \$ 475.00 | 1.6 | \$ 760.00 |
| 7/7/2020 | M. Insley-Pruitt | Reviewing draft complaint | \$ 825.00 | 0.6 | \$ 495.00 |
| 7/7/2020 | Carl L. Stine | Review & revise draft complaint; tel w/MIP re same; send same to client. | \$ 895.00 | 2.8 | \$ 2,506.00 |
| 7/8/2020 | Carl L. Stine | Email re draft; review Dr's Best fact sheet. | \$ 895.00 | 1.2 | \$ 1,074.00 |
| 7/9/2020 | Philip M. Black | Research on warranty claims and revising complaint. | \$ 475.00 | 2.5 | \$ 1,187.50 |
| 7/9/2020 | M. Insley-Pruitt | Reviewing complaint | \$ 825.00 | 0.2 | \$ 165.00 |

| Date | Timekeeper | Task Description | Hourly Rate | Hours Worked | Fee (Hourly Rate x Hours Worked) |
|-----------|-------------------|--|-------------|--------------|----------------------------------|
| 7/16/2020 | M. Insley-Pruitt | Reviewing draft complaint | \$ 825.00 | 1.0 | \$ 825.00 |
| 7/21/2020 | M. Insley-Pruitt | Following up on draft complaint | \$ 825.00 | 0.1 | \$ 82.50 |
| 7/22/2020 | M. Insley-Pruitt | Discussion with local counsel re filing complaint | \$ 825.00 | 0.4 | \$ 330.00 |
| 7/29/2020 | Carl L. Stine | Prepare pro hac app. & send to local. | \$ 895.00 | 0.5 | \$ 447.50 |
| 8/5/2020 | Philip M. Black | Research and review on prior litigation against Dr's Best. | \$ 475.00 | 3.0 | |
| | | | | | \$ 1,425.00 |
| 8/5/2020 | M. Insley-Pruitt | Reviewing recent glucosamine case | \$ 825.00 | 1.0 | \$ 825.00 |
| 8/5/2020 | Carl L. Stine | Review email from def's counsel & emails re same. | \$ 895.00 | 0.5 | \$ 447.50 |
| 8/6/2020 | M. Insley-Pruitt | Correspondence re schedule | \$ 825.00 | 0.3 | \$ 247.50 |
| 8/10/2020 | M. Insley-Pruitt | Correspondence re schedule with defense counsel | \$ 825.00 | 0.5 | \$ 412.50 |
| 8/10/2020 | Carl L. Stine | Zoom call w/potential expert. | \$ 895.00 | 0.3 | \$ 268.50 |
| 8/12/2020 | Carl L. Stine | Call with team re strategy | \$ 895.00 | 0.3 | \$ 268.50 |
| 8/18/2020 | Philip M. Black | Reviewing letter from opposing counsel. | \$ 475.00 | 0.3 | \$ 142.50 |
| 8/18/2020 | Carl L. Stine | Review defs' letter & emails re same. | \$ 895.00 | 0.5 | \$ 447.50 |
| 8/19/2020 | M. Insley-Pruitt | M/c with defense counsel on MTD | \$ 825.00 | 0.4 | \$ 330.00 |
| 8/19/2020 | Carl L. Stine | Tel re strategy | \$ 895.00 | 0.4 | \$ 358.00 |
| 8/26/2020 | M. Insley-Pruitt | Drafting response to request; gathering testing information | \$ 825.00 | 0.8 | |
| | | | | | \$ 660.00 |
| 8/27/2020 | Philip M. Black | Email to Matt and Carl re: lot and testing disclosure. | \$ 475.00 | 0.2 | \$ 95.00 |
| 8/28/2020 | M. Insley-Pruitt | Coordinating exchange of data | \$ 825.00 | 0.5 | \$ 412.50 |
| 8/31/2020 | Philip M. Black | Reviewing email from Carl re: lot number and responding to same. | \$ 475.00 | 0.1 | |
| | | | | | \$ 47.50 |
| 8/31/2020 | Philip M. Black | Reviewing emails re: information exchange and responding internally to same. | \$ 475.00 | 0.2 | |
| | | | | | \$ 95.00 |
| 9/1/2020 | M. Insley-Pruitt | conf call with team, local counsel re response to MTD, scheduling issues | \$ 825.00 | 1.1 | |
| | | | | | \$ 907.50 |
| 9/10/2020 | Melissa Gianfagna | New Case Opening | \$ 320.00 | 1.5 | \$ 480.00 |
| 9/15/2020 | Philip M. Black | Internal email re: additional extension to defendants. | \$ 475.00 | 0.1 | \$ 47.50 |
| 9/16/2020 | M. Insley-Pruitt | Providing information regarding discussions | \$ 825.00 | 1.0 | \$ 825.00 |
| 9/16/2020 | Carl L. Stine | Review def's lab reports. | \$ 895.00 | 0.2 | \$ 179.00 |
| 9/17/2020 | Philip M. Black | Reviewing lab reports and message to opposing counsel. | \$ 475.00 | 0.4 | |
| | | | | | \$ 190.00 |

| Date | Timekeeper | Task Description | Hourly Rate | Hours Worked | Fee (Hourly Rate x Hours Worked) |
|------------|------------------|---|-------------|--------------|----------------------------------|
| 9/17/2020 | Philip M. Black | Research and internal correspondence re: test results. | \$ 475.00 | 0.3 | \$ 142.50 |
| 9/17/2020 | M. Insley-Pruitt | Discussion with team re testing results | \$ 825.00 | 0.4 | \$ 330.00 |
| 9/17/2020 | Carl L. Stine | Review MIP email & our lab report. | \$ 895.00 | 0.2 | \$ 179.00 |
| 9/20/2020 | M. Insley-Pruitt | Circulating results to lab | \$ 825.00 | 0.3 | \$ 247.50 |
| 9/21/2020 | Philip M. Black | Call with S&N labs re: defendant's testing. | \$ 475.00 | 0.4 | \$ 190.00 |
| 9/21/2020 | Philip M. Black | Drafting email follow-up to Carl and Matt re: call with lab. | \$ 475.00 | 0.2 | \$ 95.00 |
| 9/21/2020 | M. Insley-Pruitt | Discussion with expert, team, re testing results | \$ 825.00 | 0.7 | \$ 577.50 |
| 9/22/2020 | M. Insley-Pruitt | Coordinating call with counsel | \$ 825.00 | 0.2 | \$ 165.00 |
| 9/25/2020 | Philip M. Black | Call with opposing counsel. | \$ 475.00 | 0.4 | \$ 190.00 |
| 9/25/2020 | M. Insley-Pruitt | Meet and confer with defense counsel, preparation for call | \$ 825.00 | 0.6 | \$ 495.00 |
| 10/7/2020 | M. Insley-Pruitt | Coordinating discussion times | \$ 825.00 | 0.4 | \$ 330.00 |
| 10/8/2020 | M. Insley-Pruitt | Coordinating call | \$ 825.00 | 0.6 | \$ 495.00 |
| 10/12/2020 | Philip M. Black | Call with opposing counsel to discuss settlement. | \$ 475.00 | 0.3 | \$ 142.50 |
| 10/12/2020 | Philip M. Black | Call with Matt and Jonathan to discuss case and strategy. | \$ 475.00 | 0.3 | \$ 142.50 |
| 10/12/2020 | M. Insley-Pruitt | Conf call with defendants, then post-call analysis and writing email | \$ 825.00 | 0.9 | \$ 742.50 |
| 10/13/2020 | Philip M. Black | Call with Carl and Matt re: case strategy. | \$ 475.00 | 0.1 | \$ 47.50 |
| 10/13/2020 | Philip M. Black | Reviewing proposed email to opposing counsel re: discovery and extension. | \$ 475.00 | 0.1 | \$ 47.50 |
| 10/13/2020 | M. Insley-Pruitt | Drafting / sending email to defense counsel re schedule | \$ 825.00 | 0.3 | \$ 247.50 |
| 10/13/2020 | Carl L. Stine | Email from MIP re call w/def's attorneys. | \$ 895.00 | 0.2 | \$ 179.00 |
| 10/19/2020 | Philip M. Black | Reviewing email and attached draft stipulations from opposing counsel. | \$ 475.00 | 0.2 | \$ 95.00 |
| 10/21/2020 | M. Insley-Pruitt | Reviewing proposed stipulation | \$ 825.00 | 0.2 | \$ 165.00 |
| 10/28/2020 | Philip M. Black | Emails to Carl and Matt re: correspondence with opposing counsel. | \$ 475.00 | 0.2 | \$ 95.00 |
| 10/28/2020 | M. Insley-Pruitt | Email w/ defendants | \$ 825.00 | 0.2 | \$ 165.00 |
| 10/28/2020 | Carl L. Stine | Emails re extension for defs. | \$ 895.00 | 0.3 | \$ 268.50 |

| Date | Timekeeper | Task Description | Hourly Rate | Hours Worked | Fee (Hourly Rate x Hours Worked) |
|------------|------------------|---|-------------|--------------|----------------------------------|
| 11/13/2020 | Carl L. Stine | Review draft NDA & emails re same. | \$ 895.00 | 1.2 | \$ 1,074.00 |
| 11/16/2020 | M. Insley-Pruitt | Communication re NDA | \$ 825.00 | 0.1 | \$ 82.50 |
| 11/30/2020 | Philip M. Black | Call with Carl and Matt re: case tasks and strategy. | \$ 475.00 | 0.1 | \$ 47.50 |
| 11/30/2020 | M. Insley-Pruitt | Drafting settlement response | \$ 825.00 | 0.6 | \$ 495.00 |
| 12/1/2020 | M. Insley-Pruitt | Drafting proposal | \$ 825.00 | 0.3 | \$ 247.50 |
| 12/1/2020 | Carl L. Stine | Review draft settlement proposal & emails re same; send to client. | \$ 895.00 | 0.8 | \$ 716.00 |
| 12/2/2020 | Philip M. Black | Meet and confer call with cocounsel re: motion to dismiss. | \$ 475.00 | 0.2 | \$ 95.00 |
| 12/2/2020 | M. Insley-Pruitt | Sending settlement proposal | \$ 825.00 | 0.4 | \$ 330.00 |
| 12/2/2020 | M. Insley-Pruitt | Attending meet and confer re MTD | \$ 825.00 | 0.2 | \$ 165.00 |
| 12/2/2020 | Carl L. Stine | Emails re settlement proposal. | \$ 895.00 | 0.3 | \$ 268.50 |
| 12/7/2020 | Philip M. Black | Call and follow up email re: intern research assignment. | \$ 475.00 | 0.2 | \$ 95.00 |
| 12/7/2020 | Carl L. Stine | Zoom call re tasks & strategy. | \$ 895.00 | 0.2 | \$ 179.00 |
| 12/11/2020 | Philip M. Black | Reviewing and calendaring motion to dismiss. | \$ 475.00 | 0.5 | \$ 237.50 |
| 1/5/2021 | Philip M. Black | Call with Carl and Matt to discuss case tasks, deadlines, and strategy | \$ 475.00 | 0.2 | \$ 95.00 |
| 1/5/2021 | Philip M. Black | Research and internal email re: 26(f) conference. | \$ 475.00 | 0.3 | \$ 142.50 |
| 1/11/2021 | Philip M. Black | Call with Carl and Matt to discuss case tasks, deadlines, and strategy. | \$ 475.00 | 0.1 | \$ 47.50 |
| 1/11/2021 | Philip M. Black | Reviewing email from Matt to opposing counsel. | \$ 475.00 | 0.1 | \$ 47.50 |
| 1/13/2021 | Philip M. Black | Filling out and filing notice of appearance. | \$ 475.00 | 0.6 | \$ 285.00 |
| 1/19/2021 | Philip M. Black | Call with CLS and MIP to discuss case strategy and scheduling. | \$ 475.00 | 0.2 | \$ 95.00 |
| 1/19/2021 | M. Insley-Pruitt | Emailing re Rule 26(f) | \$ 825.00 | 0.3 | \$ 247.50 |
| 1/19/2021 | Carl L. Stine | Meet w/team re things to do. | \$ 895.00 | 0.5 | \$ 447.50 |
| 1/20/2021 | M. Insley-Pruitt | Correspondence re R 26 | \$ 825.00 | 0.3 | \$ 247.50 |
| 1/29/2021 | M. Insley-Pruitt | Emails re mediation | \$ 825.00 | 0.2 | \$ 165.00 |
| 2/1/2021 | Philip M. Black | Call with MIP and CLS re: case deadlines and strategy. | \$ 475.00 | 0.2 | \$ 95.00 |
| 2/1/2021 | Philip M. Black | Settlement exploration call with opposing counsel. | \$ 475.00 | 0.4 | \$ 190.00 |

| Date | Timekeeper | Task Description | Hourly Rate | Hours Worked | Fee (Hourly Rate x Hours Worked) |
|-----------|------------------|--|-------------|--------------|----------------------------------|
| 2/1/2021 | Philip M. Black | Call with MIP and CLS re: mediation call with opposing counsel. | \$ 475.00 | 0.2 | \$ 95.00 |
| 2/1/2021 | M. Insley-Pruitt | Conf call with defendants, team, re mediation | \$ 825.00 | 1.1 | \$ 907.50 |
| 2/1/2021 | Carl L. Stine | Research re settlement issues; meet w/PB & MIP re same & issues for call later w/defs. | \$ 895.00 | 1.5 | \$ 1,342.50 |
| 2/8/2021 | Philip M. Black | Call with MIP and CLS re: case deadlines and strategy. | \$ 475.00 | 0.4 | \$ 190.00 |
| 2/8/2021 | M. Insley-Pruitt | Researching potential mediators | \$ 825.00 | 0.6 | \$ 495.00 |
| 2/8/2021 | Carl L. Stine | Zoom call re status & to do; mediators & emails re same. | \$ 895.00 | 0.4 | \$ 358.00 |
| 2/9/2021 | Philip M. Black | Calling and emailing for rates for mediators. | \$ 475.00 | 0.6 | \$ 285.00 |
| 2/10/2021 | Philip M. Black | Email to opposing counsel re: mediators and 26(f) conference. | \$ 475.00 | 0.3 | \$ 142.50 |
| 2/10/2021 | Carl L. Stine | Emails re mediators & setting up 26(f) conf. | \$ 895.00 | 0.7 | \$ 626.50 |
| 2/11/2021 | Philip M. Black | Reviewing procedures for 26(f) conference and internal emails re same. | \$ 475.00 | 1.0 | \$ 475.00 |
| 2/11/2021 | Carl L. Stine | Review judge's 26(f) order & emails w/PB re same. | \$ 895.00 | 0.7 | \$ 626.50 |
| 2/12/2021 | Philip M. Black | 26(f) conference. | \$ 475.00 | 0.4 | \$ 190.00 |
| 2/12/2021 | Philip M. Black | Drafting 26(f) report. | \$ 475.00 | 2.0 | \$ 950.00 |
| 2/16/2021 | Philip M. Black | Drafting 26(f) report. | \$ 475.00 | 2.0 | \$ 950.00 |
| 2/16/2021 | M. Insley-Pruitt | Discussion of R 26f report and meet and confer | \$ 825.00 | 0.6 | \$ 495.00 |
| 2/16/2021 | Carl L. Stine | Review & edit draft 26(f) Joint Stmt. & email re same; Zoom call w/MIP & PB re same. | \$ 895.00 | 0.8 | \$ 716.00 |
| 2/17/2021 | Philip M. Black | Call with CLS and MIP re: case status and strategy. | \$ 475.00 | 0.1 | \$ 47.50 |
| 2/17/2021 | Philip M. Black | Revising and circulating draft 26(f) report. | \$ 475.00 | 0.5 | \$ 237.50 |
| 2/17/2021 | M. Insley-Pruitt | Reviewing 26F report draft | \$ 825.00 | 0.2 | \$ 165.00 |
| 2/17/2021 | Carl L. Stine | Emails re mediation & J. Infante's availability; emails re 26(f) report. | \$ 895.00 | 1.0 | \$ 895.00 |
| 2/18/2021 | Philip M. Black | Emails w/MIP and CLS re: settlement and schedule. | \$ 475.00 | 0.2 | \$ 95.00 |
| 2/18/2021 | Carl L. Stine | Email from defs. re Mediation & Schedule & emails re same. | \$ 895.00 | 0.7 | \$ 626.50 |
| 2/19/2021 | Philip M. Black | Reviewing 26(f) report edits. | \$ 475.00 | 0.2 | \$ 95.00 |
| 2/19/2021 | Carl L. Stine | Review def's edits to 26(f) stmt. & emails re same. | \$ 895.00 | 0.8 | \$ 716.00 |

| Date | Timekeeper | Task Description | Hourly Rate | Hours Worked | Fee (Hourly Rate x Hours Worked) |
|-----------|-------------------|--|-------------|--------------|----------------------------------|
| 2/22/2021 | Carl L. Stine | Email w/Zhu Gui re status & mediation. | \$ 895.00 | 0.2 | \$ 179.00 |
| 2/23/2021 | Philip M. Black | Call with MIP and CLS re: case deadlines and strategy. | \$ 475.00 | 0.1 | \$ 47.50 |
| 2/23/2021 | Philip M. Black | Drafting initial disclosures. | \$ 475.00 | 1.0 | \$ 475.00 |
| 2/23/2021 | Carl L. Stine | Email to client re settlement discussions & mediator. | \$ 895.00 | 0.2 | \$ 179.00 |
| 2/24/2021 | Carl L. Stine | Review draft initial disclosures; email same; send edited version to client. | \$ 895.00 | 1.7 | \$ 1,521.50 |
| 2/26/2021 | Philip M. Black | Finalizing and serving initial disclosures. | \$ 475.00 | 1.3 | \$ 617.50 |
| 2/26/2021 | Carl L. Stine | Review draft initial disclosures & emails re same; emails re service. | \$ 895.00 | 0.7 | \$ 626.50 |
| 3/2/2021 | Philip M. Black | Call with MIP and CLS re: case strategy and deadlines. | \$ 475.00 | 0.1 | \$ 47.50 |
| 3/3/2021 | Carl L. Stine | Emails re Mediation. | \$ 895.00 | 0.2 | \$ 179.00 |
| 3/16/2021 | Melissa Gianfagna | Ran litigation expenditure and time reports. | \$ 320.00 | 0.5 | \$ 160.00 |
| 3/16/2021 | M. Insley-Pruitt | Preparing for mediation | \$ 825.00 | 0.7 | \$ 577.50 |
| 3/16/2021 | Carl L. Stine | Emails re core docs. | \$ 895.00 | 0.1 | \$ 89.50 |
| 3/18/2021 | Philip M. Black | Drafting mediation statement. | \$ 475.00 | 6.0 | \$ 2,850.00 |
| 3/19/2021 | Philip M. Black | Drafting mediation statement. | \$ 475.00 | 6.0 | \$ 2,850.00 |
| 3/22/2021 | Philip M. Black | Call with CLS and MIP re: case strategy and deadlines. | \$ 475.00 | 0.1 | \$ 47.50 |
| 3/22/2021 | Carl L. Stine | Review & edit draft Mediation Stmt.; review news stories re recent settlement. | \$ 895.00 | 1.8 | \$ 1,611.00 |
| 3/23/2021 | Philip M. Black | Internal emails re: case strategy and settlement value. | \$ 475.00 | 0.5 | \$ 237.50 |
| 3/23/2021 | Carl L. Stine | Further review of recent settlement & email re same & re Mediation. | \$ 895.00 | 0.4 | \$ 358.00 |
| 3/24/2021 | Philip M. Black | Call with CLS and MIP re: case strategy and deadlines. | \$ 475.00 | 0.9 | \$ 427.50 |
| 3/24/2021 | Philip M. Black | Drafting motion to dismiss response and related research. | \$ 475.00 | 2.0 | \$ 950.00 |
| 3/24/2021 | Philip M. Black | Sending research assignment materials to intern | \$ 475.00 | 0.5 | \$ 237.50 |
| 3/24/2021 | Carl L. Stine | Review recent case docket; calls w/team to discuss. | \$ 895.00 | 0.8 | \$ 716.00 |
| 3/25/2021 | Philip M. Black | Drafting motion to dismiss response. | \$ 475.00 | 2.0 | \$ 950.00 |
| 3/26/2021 | Philip M. Black | Drafting motion to dismiss response. | \$ 475.00 | 4.0 | \$ 1,900.00 |
| 3/29/2021 | Philip M. Black | Call with MIP and CLS re: case strategy and deadlines. | \$ 475.00 | 0.1 | \$ 47.50 |

| Date | Timekeeper | Task Description | Hourly Rate | Hours Worked | Fee (Hourly Rate x Hours Worked) |
|-----------|-------------------|---|-------------|--------------|----------------------------------|
| 3/29/2021 | Carl L. Stine | Emails w/intern re new settled case; & email to Cort re docs. | \$ 895.00 | 0.5 | \$ 447.50 |
| 4/1/2021 | Carl L. Stine | Review & edit draft Mediation Stmt. | \$ 895.00 | 0.8 | \$ 716.00 |
| 4/2/2021 | Philip M. Black | Call with MIP and CLS and co-counsel re: case strategy and deadlines. | \$ 475.00 | 0.2 | \$ 95.00 |
| 4/4/2021 | M. Insley-Pruitt | Revising mediation statement, including researching recent settlement | \$ 825.00 | 1.6 | \$ 1,320.00 |
| 4/5/2021 | Philip M. Black | Editing mediation statement and related research. | \$ 475.00 | 1.5 | \$ 712.50 |
| 4/5/2021 | Philip M. Black | Call with CLS and MIP re: case strategy and deadlines. | \$ 475.00 | 0.2 | \$ 95.00 |
| 4/5/2021 | Philip M. Black | Drafting motion to dismiss response. | \$ 475.00 | 5.5 | \$ 2,612.50 |
| 4/5/2021 | Carl L. Stine | Review defs' docs. & emails re same; review revised Mediation Stmt. | \$ 895.00 | 2.0 | \$ 1,790.00 |
| 4/6/2021 | Philip M. Black | Drafting motion to dismiss response. | \$ 475.00 | 1.5 | \$ 712.50 |
| 4/6/2021 | Philip M. Black | Revising mediation statement. | \$ 475.00 | 1.5 | \$ 712.50 |
| 4/6/2021 | M. Insley-Pruitt | Reviewing submission | \$ 825.00 | 0.3 | \$ 247.50 |
| 4/6/2021 | Carl L. Stine | Review & edit opp to Motion to Dismiss, review revised Mediation Stmt. & send draft to client; review revisions & emails re same. | \$ 895.00 | 2.3 | \$ 2,058.50 |
| 4/7/2021 | M. Insley-Pruitt | Sending mediation statement to mediator | \$ 825.00 | 0.6 | \$ 495.00 |
| 4/7/2021 | Carl L. Stine | Review Glancy's edits & comments to draft MTD opp. | \$ 895.00 | 0.2 | \$ 179.00 |
| 4/8/2021 | M. Insley-Pruitt | Reviewing opposition to MTD | \$ 825.00 | 1.5 | \$ 1,237.50 |
| 4/8/2021 | M. Insley-Pruitt | Preparation for mediation | \$ 825.00 | 0.2 | \$ 165.00 |
| 4/9/2021 | Philip M. Black | Revising and finalizing motion to dismiss response. | \$ 475.00 | 1.0 | \$ 475.00 |
| 4/9/2021 | Melissa Gianfagna | Cite checked, shepardized and made a Table of Authorities for the Opposition to Motion to Dismiss Brief. | \$ 320.00 | 7.0 | \$ 2,240.00 |
| 4/9/2021 | Carl L. Stine | Review def's draft term sheet; emails re MTD opp & filing. | \$ 895.00 | 0.8 | \$ 716.00 |
| 4/11/2021 | M. Insley-Pruitt | Reviewing draft settlement papers | \$ 825.00 | 0.5 | \$ 412.50 |
| 4/12/2021 | M. Insley-Pruitt | Preparing for mediation | \$ 825.00 | 2.2 | \$ 1,815.00 |
| 4/12/2021 | Carl L. Stine | Emails re settlement form sent by defs; Zoom re strategy; emails re Mediation & lodestar. | \$ 895.00 | 1.4 | \$ 1,253.00 |

| Date | Timekeeper | Task Description | Hourly Rate | Hours Worked | Fee (Hourly Rate x Hours Worked) |
|-----------|------------------|---|-------------|--------------|----------------------------------|
| 4/13/2021 | Philip M. Black | Mediation. | \$ 475.00 | 8.0 | \$ 3,800.00 |
| 4/13/2021 | M. Insley-Pruitt | Attending mediation | \$ 825.00 | 8.0 | \$ 6,600.00 |
| 4/13/2021 | Carl L. Stine | Prep for Mediation; attend & follow-up; emails re fee back-up. | \$ 895.00 | 6.0 | \$ 5,370.00 |
| 4/14/2021 | Philip M. Black | Reviewing term sheet and internal emails re: same. | \$ 475.00 | 0.5 | \$ 237.50 |
| 4/14/2021 | Philip M. Black | Inputting edits to term sheet. | \$ 475.00 | 0.3 | \$ 142.50 |
| 4/14/2021 | M. Insley-Pruitt | Revising term sheet | \$ 825.00 | 1.3 | \$ 1,072.50 |
| 4/14/2021 | Carl L. Stine | Emails re settlement w/client & internally; tel w/CBW re same; email to Zhu Gui re same. | \$ 895.00 | 1.2 | \$ 1,074.00 |
| 4/15/2021 | Carl L. Stine | Emails re settlement & term sheet. | \$ 895.00 | 0.6 | \$ 537.00 |
| 4/16/2021 | Carl L. Stine | Emails re revised term sheet; review same & emails re same. | \$ 895.00 | 0.5 | \$ 447.50 |
| 4/19/2021 | Carl L. Stine | Emails re term sheet; review & sign same. | \$ 895.00 | 0.6 | \$ 537.00 |
| 4/20/2021 | Carl L. Stine | Emails re settlement; review proposed order & emails re same. | \$ 895.00 | 0.6 | \$ 537.00 |
| 4/21/2021 | Carl L. Stine | Emails w/co-counsel re settlement; emails re proposed order. | \$ 895.00 | 0.2 | \$ 179.00 |
| 4/30/2021 | Carl L. Stine | Email to co-counsel re settlement. | \$ 895.00 | 0.1 | \$ 89.50 |
| 5/6/2021 | Carl L. Stine | Emails re claim timing & notice, administrator, subpoenaing Amazon & fee negotiation; email w/co-counsel re status. | \$ 895.00 | 0.7 | \$ 626.50 |
| 5/8/2021 | Carl L. Stine | Email re Amazon subpoena. | \$ 895.00 | 0.2 | \$ 179.00 |
| 5/10/2021 | Carl L. Stine | Email w/co-counsel re settlement. | \$ 895.00 | 0.1 | \$ 89.50 |
| 5/17/2021 | M. Insley-Pruitt | Issues re subpoena for Amazon, stip update | \$ 825.00 | 2.2 | \$ 1,815.00 |
| 5/17/2021 | Carl L. Stine | Review draft Amazon subpoena; emails re same. | \$ 895.00 | 0.7 | \$ 626.50 |
| 6/1/2021 | Carl L. Stine | Review & edit draft Settlement Agmt. & emails re same. | \$ 895.00 | 1.5 | \$ 1,342.50 |
| 6/2/2021 | M. Insley-Pruitt | Reviewing edits to Stipulation | \$ 825.00 | 0.2 | \$ 165.00 |
| 6/2/2021 | Carl L. Stine | Emails re stip & send to Jonathan. | \$ 895.00 | 0.3 | \$ 268.50 |
| 6/4/2021 | Philip M. Black | Call with MIP and CLS re: settlement agreement. | \$ 475.00 | 1.0 | \$ 475.00 |
| 6/4/2021 | M. Insley-Pruitt | Drafting settlement stip | \$ 825.00 | 1.0 | \$ 825.00 |
| 6/4/2021 | Carl L. Stine | Review edits to stip; Zoom call re same. | \$ 895.00 | 1.5 | \$ 1,342.50 |

| Date | Timekeeper | Task Description | Hourly Rate | Hours Worked | Fee (Hourly Rate x Hours Worked) |
|-----------|------------------|---|-------------|--------------|----------------------------------|
| 6/15/2021 | Carl L. Stine | Review def's edits to stip & emails re same. | \$ 895.00 | 0.8 | \$ 716.00 |
| 6/24/2021 | Carl L. Stine | Emails re stip & revised draft subpoenas. | \$ 895.00 | 1.6 | \$ 1,432.00 |
| 6/28/2021 | Philip M. Black | Call with CLS and MIP re: case strategy and deadlines. | \$ 475.00 | 0.1 | \$ 47.50 |
| 7/1/2021 | Carl L. Stine | Start reviewing draft exhibits & emails re same. | \$ 895.00 | 1.6 | \$ 1,432.00 |
| 7/2/2021 | Carl L. Stine | Review exhibits & emails re same. | \$ 895.00 | 1.3 | \$ 1,163.50 |
| 7/5/2021 | M. Insley-Pruitt | Reviewing settlement materials | \$ 825.00 | 2.5 | \$ 2,062.50 |
| 7/5/2021 | Carl L. Stine | Tel w/MIP re def's draft exhibits. | \$ 895.00 | 0.8 | \$ 716.00 |
| 7/6/2021 | M. Insley-Pruitt | Review of exhibits and correspondence with claim administrator; assembling precedents for PA brief | \$ 825.00 | 1.8 | \$ 1,485.00 |
| 7/7/2021 | M. Insley-Pruitt | Reviewing exhibits; claim administrator | \$ 825.00 | 1.3 | \$ 1,072.50 |
| 7/7/2021 | Carl L. Stine | Emails re response to exhibits. | \$ 895.00 | 0.5 | \$ 447.50 |
| 7/8/2021 | M. Insley-Pruitt | Discussing draft brief (0.7); discussion with claim administrator (0.5) | \$ 825.00 | 1.2 | \$ 990.00 |
| 7/8/2021 | Carl L. Stine | Emails re deadline for draft prelim. app. brief & re admin. | \$ 895.00 | 0.8 | \$ 716.00 |
| 7/14/2021 | Philip M. Black | Call with CLS and MIP re: case strategy. | \$ 475.00 | 0.1 | \$ 47.50 |
| 7/15/2021 | M. Insley-Pruitt | Reviewing claim administrator submissions | \$ 825.00 | 0.8 | \$ 660.00 |
| 7/15/2021 | Carl L. Stine | Emails re claims administrators. | \$ 895.00 | 0.5 | \$ 447.50 |
| 7/17/2021 | M. Insley-Pruitt | Reviewing PA brief | \$ 825.00 | 2.0 | \$ 1,650.00 |
| 7/18/2021 | Carl L. Stine | Review MIP edits to prelim. app. brief; emails re same & hiring admin. & specific products. | \$ 895.00 | 3.3 | \$ 2,953.50 |
| 7/19/2021 | Philip M. Black | Call with MIP, CLS re: preliminary approval. | \$ 475.00 | 0.2 | \$ 95.00 |
| 7/19/2021 | M. Insley-Pruitt | Reviewing PA brief; discussing claim administrator | \$ 825.00 | 0.9 | \$ 742.50 |
| 7/21/2021 | M. Insley-Pruitt | Issues re notice and finalization of settlement agreement | \$ 825.00 | 1.5 | \$ 1,237.50 |
| 7/21/2021 | Carl L. Stine | Emails re settlement docs; send same to client. | \$ 895.00 | 1.0 | \$ 895.00 |
| 7/22/2021 | Philip M. Black | Reviewing preliminary approval brief. | \$ 475.00 | 0.6 | \$ 285.00 |
| 7/22/2021 | M. Insley-Pruitt | Settlement agreement and exhibits finalization, as well as review of preliminary approval brief draft | \$ 825.00 | 1.9 | \$ 1,567.50 |

| Date | Timekeeper | Task Description | Hourly Rate | Hours Worked | Fee (Hourly Rate x Hours Worked) |
|------------|-------------------|---|-------------|--------------|----------------------------------|
| 7/22/2021 | Carl L. Stine | Review revised exhibits & emails re same; emails w/client; emails re administration responsibility; review JR edits to prelim. approval brief & emails re same. | \$ 895.00 | 3.3 | \$ 2,953.50 |
| 7/23/2021 | Philip M. Black | Reviewing and revising settlement papers. | \$ 475.00 | 2.5 | \$ 1,187.50 |
| 7/23/2021 | Philip M. Black | Phone calls with CLS, MIP, and co-counsel re: settlement papers. | \$ 475.00 | 0.5 | \$ 237.50 |
| 7/23/2021 | Melissa Gianfagna | Cite checked, shepardized and made a Table of Authorities in the Preliminary Approval Brief. | \$ 320.00 | 7.0 | \$ 2,240.00 |
| 7/23/2021 | M. Insley-Pruitt | Finalizing preliminary approval brief, motion, and settlement agreement for filing | \$ 825.00 | 3.3 | \$ 2,722.50 |
| 7/23/2021 | Carl L. Stine | Emails re Stip. & Prelim. Approval Motion. | \$ 895.00 | 0.8 | \$ 716.00 |
| 7/27/2021 | M. Insley-Pruitt | Coordinating hearing date | \$ 825.00 | 0.2 | \$ 165.00 |
| 7/29/2021 | Carl L. Stine | Emails & research re precedent settlement & fees; emails to Zhu Gui re same. | \$ 895.00 | 2.0 | \$ 1,790.00 |
| 8/2/2021 | M. Insley-Pruitt | Reviewing CAFA notice | \$ 825.00 | 0.1 | \$ 82.50 |
| 8/2/2021 | Carl L. Stine | Emails re CAFA notification & review same. | \$ 895.00 | 0.5 | \$ 447.50 |
| 8/5/2021 | Carl L. Stine | Email to Zhu Gui re approval | \$ 895.00 | 0.2 | \$ 179.00 |
| 8/13/2021 | Carl L. Stine | Review draft protective order & email re same. | \$ 895.00 | 1.0 | \$ 895.00 |
| 9/7/2021 | Carl L. Stine | Emails re: submissions of expenses and patent attorney; set up call w/ same. | \$ 895.00 | 0.8 | \$ 716.00 |
| 9/8/2021 | Carl L. Stine | Telephone w/ lawyer re; expense submission and emails re: same. | \$ 895.00 | 1.2 | \$ 1,074.00 |
| 10/11/2021 | Carl L. Stine | emails to Zhu Gui w/ preliminary approval brief and explaining fee and expense application procedure. | \$ 895.00 | 0.7 | \$ 626.50 |
| 10/12/2021 | Carl L. Stine | Emails w/ Zhu Gui re; fees. | \$ 895.00 | 0.5 | \$ 447.50 |
| 10/13/2021 | Philip M. Black | Research on clear sailing provisions. | \$ 475.00 | 1.0 | \$ 475.00 |
| 10/13/2021 | Carl L. Stine | emails w/ Zhu Gui re; expense invoices. | \$ 895.00 | 0.5 | \$ 447.50 |
| 10/15/2021 | Philip M. Black | Internal email re: lodestar. | \$ 475.00 | 0.3 | \$ 142.50 |
| 10/15/2021 | Carl L. Stine | Consideration of fee petition and email to def's counsel re; re-opening negotiations and setting up call. | \$ 895.00 | 0.5 | \$ 447.50 |

| Date | Timekeeper | Task Description | Hourly Rate | Hours Worked | Fee (Hourly Rate x Hours Worked) |
|------------|------------------|---|-------------|--------------|----------------------------------|
| 10/18/2021 | Carl L. Stine | Emails w/ Zhu Gui re: expenses and fees. | \$ 895.00 | 0.5 | \$ 447.50 |
| 10/19/2021 | Carl L. Stine | Email to Zhu Gui re; expert costs; prep for call w/ defs' counsel re: fees; have call. | \$ 895.00 | 1.8 | \$ 1,611.00 |
| 10/20/2021 | Carl L. Stine | Emails re: fees/expenses. | \$ 895.00 | 0.5 | \$ 447.50 |
| 10/21/2021 | Philip M. Black | Call with MIP and CLS re: case strategy. | \$ 475.00 | 0.2 | \$ 95.00 |
| 10/21/2021 | Carl L. Stine | Emails w/ Zhu Gui re; fees/expenses. | \$ 895.00 | 0.5 | \$ 447.50 |
| 10/22/2021 | Carl L. Stine | Emails w/ Zhu Gui re: fees and expenses. | \$ 895.00 | 0.6 | \$ 537.00 |
| 11/10/2021 | Carl L. Stine | Review def's email re: fees; research re; same; prepare draft response. | \$ 895.00 | 1.5 | \$ 1,342.50 |
| 11/13/2021 | Carl L. Stine | Consider and evaluate response re: settlement and fees and email re: same. | \$ 895.00 | 0.5 | \$ 447.50 |
| 12/13/2021 | Philip M. Black | Internal emails re: settlement offer. | \$ 475.00 | 0.3 | \$ 142.50 |
| 12/13/2021 | Carl L. Stine | emails from defs re: fees, emails re: same, review lodestar materials | \$ 895.00 | 2.3 | \$ 2,058.50 |
| 12/14/2021 | Philip M. Black | Reviewing email from cocounsel re settlement. | \$ 475.00 | 0.1 | \$ 47.50 |
| 12/14/2021 | Carl L. Stine | zoom re: fee negotiations and emails re: same | \$ 895.00 | 0.5 | \$ 447.50 |
| 12/15/2021 | Philip M. Black | Research on reply procedure. | \$ 475.00 | 0.4 | \$ 190.00 |
| 12/17/2021 | Philip M. Black | Reviewing emails with cocounsel re: reply papers. | \$ 475.00 | 0.3 | \$ 142.50 |
| 12/23/2021 | Carl L. Stine | email to Zhu Gui re: fee/expenses | \$ 895.00 | 0.5 | \$ 447.50 |
| 12/28/2021 | Carl L. Stine | emails re: prelim approval reply brief and draft notice, zoom re: same | \$ 895.00 | 2.4 | \$ 2,148.00 |
| 12/30/2021 | Philip M. Black | Drafting updates to preliminary approval papers. | \$ 475.00 | 3.0 | \$ 1,425.00 |
| 12/30/2021 | M. Insley-Pruitt | Issues re supplemental filing | \$ 825.00 | 0.5 | \$ 412.50 |
| 12/30/2021 | Carl L. Stine | emails re: new papers re: fee agreement, research re: same | \$ 895.00 | 0.5 | \$ 447.50 |
| 12/31/2021 | M. Insley-Pruitt | Issues re supplemental filing | \$ 825.00 | 0.2 | \$ 165.00 |
| 1/2/2022 | Philip M. Black | Reviewing emails re: fee settlement. | \$ 475.00 | 0.8 | \$ 380.00 |
| 1/3/2022 | Philip M. Black | Drafting updates to preliminary approval papers. | \$ 475.00 | 1.5 | \$ 712.50 |
| 1/3/2022 | Carl L. Stine | email with client re: amendment to settlement agreement, emails re preliminary approval and revised agreement | \$ 895.00 | 0.5 | \$ 447.50 |
| 1/5/2022 | M. Insley-Pruitt | Revising agreement submission | \$ 825.00 | 0.4 | \$ 330.00 |

| Date | Timekeeper | Task Description | Hourly Rate | Hours Worked | Fee (Hourly Rate x Hours Worked) |
|-----------|------------------|--|-------------|--------------|----------------------------------|
| 1/6/2022 | Carl L. Stine | review MIP draft for follow up submission, sign and email agreement | \$ 895.00 | 1.2 | \$ 1,074.00 |
| 1/12/2022 | Carl L. Stine | emails re: preliminary approval hearing | \$ 895.00 | 0.5 | \$ 447.50 |
| 1/13/2022 | M. Insley-Pruitt | Preparation for preliminary approval hearing | \$ 825.00 | 3.0 | \$ 2,475.00 |
| 1/13/2022 | Carl L. Stine | zoom with MIP and PB re: hearing issues | \$ 895.00 | 0.3 | \$ 268.50 |
| 1/14/2022 | Philip M. Black | Call with CLS and MIP re: approval of settlement. | \$ 475.00 | 0.3 | \$ 142.50 |
| 1/14/2022 | M. Insley-Pruitt | Preparation for and attending preliminary approval conference | \$ 825.00 | 4.0 | \$ 3,300.00 |
| 1/14/2022 | Carl L. Stine | review MIP's script for hearing; attend hearing and zoom after; email Zhu Gui re: hearing | \$ 895.00 | 2.8 | \$ 2,506.00 |
| 1/18/2022 | M. Insley-Pruitt | Coordinating issues re subpoena recipients | \$ 825.00 | 0.8 | \$ 660.00 |
| 1/20/2022 | Philip M. Black | Emails re: declaration from claims administrator. | \$ 475.00 | 0.2 | \$ 95.00 |
| 1/20/2022 | M. Insley-Pruitt | Issues re supplemental briefing | \$ 825.00 | 0.7 | \$ 577.50 |
| 1/23/2022 | Carl L. Stine | emails with Zhu Gui | \$ 895.00 | 0.7 | \$ 626.50 |
| 1/25/2022 | M. Insley-Pruitt | Researching for supplemental briefing | \$ 825.00 | 2.0 | \$ 1,650.00 |
| 1/25/2022 | Carl L. Stine | Emails with Zhu Gui | \$ 895.00 | 0.7 | \$ 626.50 |
| 1/26/2022 | M. Insley-Pruitt | Drafting supplemental submission | \$ 825.00 | 4.0 | \$ 3,300.00 |
| 1/27/2022 | M. Insley-Pruitt | Preparing supplemental submission and declaration | \$ 825.00 | 2.0 | \$ 1,650.00 |
| 1/27/2022 | Carl L. Stine | review Zhu email re: expenses and respond; emails re: papers adn Glancy CV and sharing with defs | \$ 895.00 | 0.5 | \$ 447.50 |
| 1/28/2022 | Philip M. Black | Reviewing supplemental papers. | \$ 475.00 | 0.4 | \$ 190.00 |
| 1/28/2022 | M. Insley-Pruitt | Completing supplemental filing | \$ 825.00 | 1.5 | \$ 1,237.50 |
| 1/28/2022 | Carl L. Stine | review revised supplement and emails re: same | \$ 895.00 | 0.5 | \$ 447.50 |
| 2/7/2022 | M. Insley-Pruitt | Investigating ASIN information | \$ 825.00 | 1.5 | \$ 1,237.50 |
| 2/7/2022 | Carl L. Stine | emails re: notice issues | \$ 895.00 | 0.2 | \$ 179.00 |
| 2/28/2022 | M. Insley-Pruitt | Reviewing preliminary approval order; discussion re subpoena recipient | \$ 825.00 | 1.0 | \$ 825.00 |
| 3/1/2022 | Philip M. Black | Reviewing emails re: settlement. | \$ 475.00 | 0.5 | \$ 237.50 |
| 3/1/2022 | M. Insley-Pruitt | Revising and circulating notice | \$ 825.00 | 2.5 | \$ 2,062.50 |
| 3/1/2022 | Carl L. Stine | read judge's decision and emails re: same | \$ 895.00 | 0.7 | \$ 626.50 |
| 3/3/2022 | M. Insley-Pruitt | Reviewing notice | \$ 825.00 | 1.2 | \$ 990.00 |
| 3/4/2022 | M. Insley-Pruitt | Settlement / final approval coordination | \$ 825.00 | 1.5 | \$ 1,237.50 |

| Date | Timekeeper | Task Description | Hourly Rate | Hours Worked | Fee (Hourly Rate x Hours Worked) |
|-----------|------------------|--|-------------|--------------|----------------------------------|
| 3/7/2022 | Philip M. Black | Reading emails re: settlement admin. | \$ 475.00 | 0.3 | \$ 142.50 |
| 3/7/2022 | Carl L. Stine | review final notice | \$ 895.00 | 0.5 | \$ 447.50 |
| 3/8/2022 | Philip M. Black | Reading emails re: settlement admin. | \$ 475.00 | 0.3 | \$ 142.50 |
| 3/9/2022 | Philip M. Black | Reading emails re: settlement admin. | \$ 475.00 | 0.3 | \$ 142.50 |
| 3/9/2022 | M. Insley-Pruitt | Coordinating issues re notice | \$ 825.00 | 1.5 | \$ 1,237.50 |
| 3/10/2022 | M. Insley-Pruitt | Issues re notices and submission to court | \$ 825.00 | 2.4 | \$ 1,980.00 |
| 3/11/2022 | Philip M. Black | Reviewing emails re: settlement. | \$ 475.00 | 0.4 | \$ 190.00 |
| 3/11/2022 | M. Insley-Pruitt | Issues re notice and media buys | \$ 825.00 | 0.7 | \$ 577.50 |
| 3/14/2022 | M. Insley-Pruitt | Oversight of settlement administration, unique ids, etc. | \$ 825.00 | 0.4 | \$ 330.00 |
| 3/14/2022 | Carl L. Stine | emails re: status of notice | \$ 895.00 | 0.2 | \$ 179.00 |
| 3/31/2022 | M. Insley-Pruitt | Reviewing questions from class members; communication with claims administrators | \$ 825.00 | 1.8 | \$ 1,485.00 |
| 4/5/2022 | M. Insley-Pruitt | Researching objectors, recent settlement, recent relevant settlements | \$ 825.00 | 1.5 | \$ 1,237.50 |
| 4/7/2022 | M. Insley-Pruitt | Responding to class member inquiries; communicating with claims administrator | \$ 825.00 | 6.0 | \$ 4,950.00 |
| 4/8/2022 | M. Insley-Pruitt | Communicating with class members | \$ 825.00 | 2.0 | \$ 1,650.00 |
| 4/8/2022 | Carl L. Stine | emails re: exclusions | \$ 895.00 | 0.2 | \$ 179.00 |
| 4/11/2022 | M. Insley-Pruitt | Communicating with class members | \$ 825.00 | 0.5 | \$ 412.50 |
| 4/12/2022 | M. Insley-Pruitt | Contact with class members | \$ 825.00 | 0.5 | \$ 412.50 |
| 4/13/2022 | M. Insley-Pruitt | Contact with class members | \$ 825.00 | 2.5 | \$ 2,062.50 |
| 4/21/2022 | M. Insley-Pruitt | Coordinating subpoena response | \$ 825.00 | 0.5 | \$ 412.50 |
| 4/22/2022 | M. Insley-Pruitt | Discussion re response to subpoena recipient | \$ 825.00 | 0.4 | \$ 330.00 |
| 4/26/2022 | M. Insley-Pruitt | Discussion with claim administrator on status | \$ 825.00 | 0.4 | \$ 330.00 |
| 5/4/2022 | M. Insley-Pruitt | Coordinating response to class members | \$ 825.00 | 2.6 | \$ 2,145.00 |
| 5/5/2022 | M. Insley-Pruitt | Addressing class member concerns | \$ 825.00 | 2.0 | \$ 1,650.00 |
| 5/9/2022 | M. Insley-Pruitt | Discussing final approval brief with PB | \$ 825.00 | 0.5 | \$ 412.50 |
| | | | | 329.8 | 233779.0 |