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11 Attorneys for Plaintiff KIRILOSE MANSOUR,  
12 on behalf of himself and all others similarly situated

13 **SUPERIOR COURT OF CALIFORNIA**  
14 **COUNTY OF RIVERSIDE**

15 KIRILOSE MANSOUR, individually on  
16 behalf of himself and all others similarly  
17 situated,

17 Plaintiff,

18 vs.

19 BUMBLE TRADING, INC., a Delaware  
20 corporation; and DOES 1-10, inclusive,  
21 and each of them,

22 Defendants.

**Case No.:** RIC1810011

**DECLARATION OF STEVEN S.  
SOLIMAN IN SUPPORT OF  
PLAINTIFF'S MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT AND MOTION FOR  
ATTORNEY FEES AND COSTS**

**Date:** October 7, 2021

**Time:** 8:30 a.m.

**Dept:** 06

**Honorable Sunshine S. Sykes**

1 **I, Steven S. Soliman, declare:**

- 2 1. I am an attorney licensed to practice law in the State of California since 2012. I have been  
3 continuously licensed in California since 2012 and am in good standing with the California  
4 State Bar. I am admitted to practice in all state courts in California. I am also admitted in  
5 the following District Courts in California: 1) Southern District of California; and 2)  
6 Central District of California. I am a principal of the firm The Soliman Firm, P.L.C., and  
7 counsel for Plaintiff Kirilose Mansour (“Plaintiff”) in the above-captioned action against  
8 Defendant BUMBLE TRADING, INC. (“Defendant”).  
9  
10  
11 2. I have personal knowledge of the following facts and, if called upon as a witness, could  
12 and would competently testify thereto, except as to those matters which are explicitly set  
13 forth as based upon my information and belief and, as to such matters, I am informed and  
14 believe that they are true and correct.  
15  
16 3. I am writing this declaration in support of Plaintiff’s Motion for Final Approval of Class  
17 Action Settlement and Motion for Attorneys’ Fees and Costs, and specifically, to establish  
18 the time spent litigating this case.  
19  
20 4. This action required my firm to spend time on this litigation that could have been spent on  
21 other matters. At various times during the litigation of this class action, this lawsuit has  
22 consumed my time as well as my firm’s resources. My firm has not been paid anything for  
23 our work on this case since it was filed. It is my opinion that law firms in such a position  
24 expect to receive a multiplier in cases such as these because of the risk taken, the extent to  
25 which firms are unable to take on other cases, the delay in getting paid and the costs we  
26 have to advance.  
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1                   **EXPERIENCE OF STEVEN S. SOLIMAN AND THE SOLIMAN FIRM, P.L.C.**

- 2
- 3                   5. In 2015, I began practicing in the areas of consumer protection with a concentration in the
- 4                   Telephone Consumer Protection Act (TCPA), and the Consumer Legal Remedies Act
- 5                   (CLRA). For approximately the past four years, I have been and/or still am lead or
- 6                   secondary class counsel on at least eight (8) class action cases. Further, I have taken an
- 7                   active role during the pleadings and discovery stages involving individual and class claims
- 8                   as well as in settlement negotiations and in responding to any dispositive and/or other
- 9                   motions.
- 10
- 11                  6. These actions were litigated primarily in federal courts in California as well as California
- 12                  State Courts. My experience in litigating class actions allow me to provide outstanding
- 13                  representation to the Settlement Class. I have also partnered with the Law Offices of Todd
- 14                  M. Friedman P.C. on this matter, who are exceptionally experienced class litigators. I have
- 15                  strived to fairly, responsibly, vigorously and adequately represent the putative class
- 16                  members in this action.
- 17
- 18                  7. I have served as plaintiff's counsel in at least the following cases involving various
- 19                  consumer rights claims (including class actions claims) under consumer protection
- 20                  statutes:
- 21                               a. *Zymeri v. Spectrum Brands, Inc.*, 5:15-cv-02351-DDP-SP (C.D. Cal.);
- 22                               b. *Velie v. Westfield*, BC6709647 (Super. Ct. Cal. Los Angeles 2018);
- 23                               c. *Tunc. v. Palazzo*, BC682339 (Super. Ct. Cal. Los Angeles 2017);
- 24                               d. *Tercero v. The American Automobile Association, Inc.*, 30-2019-01052233-CU-
- 25                                       OE-CXC (O.C. Superior Court);
- 26                               e. *Bottalico v. Monat Global Corp.*, 1:18-cv-20624-DPG (S.D. Fla.);
- 27
- 28

1 f. *Vakilzadeh v. Trustees of CSU*, 20STCV23134 (Super. Ct. Cal. Los Angeles  
2 2021.

- 3 8. I maintained contemporaneous time records in this action and have attached a copy of those  
4 records hereto as Exhibit A. My hourly rate charged in this matter was \$675 per hour, as  
5 discussed below.
- 6 9. Since the inception of this case, I have expended approximately 313 hours of work  
7 litigating the matter. This includes appearances, motion practice, a deposition, and both  
8 mediations. Thus, my total lodestar in this matter taking my hours and multiplying by my  
9 hourly rate is \$211,275. I anticipate expending an additional forty (40) hours continuing to  
10 oversee the continued notice, reviewing the reply brief and supplemental documents to  
11 reflect increased claims and other responses, preparing for the final approval hearing, and  
12 overseeing the settlement administration until completion.
- 13 10. I only take cases on a contingency only basis, such that no client of mine has ever paid me a  
14 hourly rate for the performance of my services. My hourly rate is justified by on my  
15 experience, expertise, and the customary Laffey Matrix as attached to the Declaration of  
16 Todd M. Friedman. As an attorney with nine years of experience, my rate of \$675 per hour  
17 is within the customary range contained within the Laffey Matrix.  
18  
19

20 I declare under penalty of perjury under the laws of California and the United States  
21 that the foregoing is true and correct, and that this declaration was executed September 9, 2021  
22 at Costa Mesa, California.  
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24  
25 By:   
26 Steven S. Soliman  
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EXHIBIT A

**Mansour, Kirilose v. Bumble**

**TIME ENTRIES: Steven S. Soliman, Esq. – Senior Managing Attorney**

<b>Date</b>	<b>Task</b>	<b>Hours</b>
5/16/2018	Discussion with client re claims and facts	2.2
5/18/2018	Research of legal issues	3.1
5/18/2018	Call between Todd Friedman and Steve Soliman re: Retainer and Case	2.4
5/18/2018	Receive and review retainer before call	0.5
5/18/2018	Receive revised retainer, review, forward to Plaintiff	0.6
5/22/2018	Discussion with client re claims and facts	1.7
5/23/2018	Draft complaint	2.4
5/24/2018	Finish Initial Draft of Complaint	4
5/24/2018	Call between Todd Friedman, Adrian Bacon, and Steve Soliman re: Complaint and Case	1.6
5/26/2018	Email with co-counsel re complaint	0.3
5/29/2018	Email with co-counsel re complaint	0.5
7/31/2018	Call with co-counsel re: hearing	2.4
8/4/2018	Email with co-counsel re Notice of Ruling and Request for Default	0.4
9/14/2018	Call Between Adrian Bacon and Steve Soliman re: Status of Matter	1
9/14/2018	Call with Plaintiff re: Status of Matter	1
9/18/2018	Email with opposing counsel re case	0.3
9/21/2018	Email with co-counsel re arbitration and demurrer	0.5
9/27/2018	Call with Todd Friedman, Adrian Bacon, and Steven Soliman re: Defendant's Counsel and Case Management	1.5
10/4/2018	Email with co-counsel re case	0.7
10/4/2018	Email with opposing counsel re case	0.5
10/4/2018	Call between Adrian Bacon and Steve Soliman re: Proposed	2.2

<b>Date</b>	<b>Task</b>	<b>Hours</b>
	Injunctive Relief Structures	
11/5/2018	Email with opposing counsel re case	0.3
11/7/2018	Email with co-counsel and opposing counsel re joint statement	0.6
11/13/2018	Emails with co-counsel re case	0.7
11/28/2018	Emails with opposing counsel re informal discovery	0.3
12/10/2018	Review Protective Order	0.5
12/20/2018	Emails with opposing counsel re protective order	0.3
12/20/2018	Call between Steve Soliman and Adrian Bacon re: Informal Discovery Requests	1.5
12/20/2018	Call with Steve Soliman and Plaintiff re: Informal Discovery, Status of Matter	1.5
1/16/2019	Call between Steve Soliman and Plaintiff re: Informal Discovery	0.8
1/16/2019	Review OSC re: Non-Appearance	0.5
1/16/2019	Call with Todd Friedman, Tom Wheeler, Adrian Bacon, and Steve Soliman to Discuss Case Management and Discovery	1
1/17/2019	Draft informal discovery responses, forward to Adrian	1.4
2/10/2019	Legal Research re: Case Theory, Email to Co-Counsel	1.2
2/13/2019	Emails with opposing counsel re informal discovery	0.6
2/14/2019	Emails with opposing counsel re informal discovery	0.4
2/15/2019	Emails with opposing counsel re informal discovery	0.4
2/27/2019	Emails with opposing counsel re informal discovery	0.5
2/27/2019	Review Defendant's Discovery Responses	1.8
2/27/2019	Call with Adrian Bacon and Steve Soliman re: Discovery	1

<b>Date</b>	<b>Task</b>	<b>Hours</b>
2/28/2019	Emails with opposing counsel re informal discovery	0.8
3/1/2019	Call with Adrian Bacon, Tom Wheeler, and Steven Soliman re: Status Conference & Scheduling	1
3/8/2019	Emails with opposing counsel re informal discovery	0.4
3/15/2019	Emails with opposing co-counsel re informal discovery	0.5
5/21/2019	Emails with opposing counsel re PMK depo	0.3
5/24/2019	Emails with opposing counsel re PMK depo	0.3
5/28/2019	Emails with co-counsel re deposition	0.4
5/28/2019	Call with Tom Wheeler and Steven Soliman re: Status of Matter, Deposition Dates	1
5/29/2019	Emails with opposing counsel re PMK depo	0.3
5/29/2019	Emails with co-counsel re depo	0.7
5/29/2019	Call with Plaintiff, Update on Matter, Deposition Dates	1
5/31/2019	Emails with co-counsel and opposing counsel re depo	0.5
5/31/2019	Call with Steven Soliman and Tom Wheeler re: Plaintiff's Deposition	0.5
6/10/2019	Emails with co-counsel re discovery	0.8
6/10/2019	Case research	1
6/13/2019	Emails with opposing counsel re depo	0.3
6/13/2019	Emails with opposing counsel re depo	0.3
6/19/2019	Emails with opposing counsel re Depo	0.3
7/2/2019	Emails with co-counsel re depo	0.3
7/13/2019	Emails with client	0.3
8/6/2019	Call with Adrian Bacon, Tom Wheeler, and Steven Soliman re: Deposition Scheduling	1



<b>Date</b>	<b>Task</b>	<b>Hours</b>
9/9/2019	Call Between Tom Wheeler and Steve Soliman re: Mansour Availability	0.5
9/9/2019	Call with Plaintiff re: Deposition Availability and Case Update	1
9/11/2019	Call with Tom Wheeler and Steve Soliman Re: Depositions	0.8
9/19/2019	Call with Plaintiff re: Deposition Availability	0.8
9/19/2019	Email to Bumble re: Depositions	0.3
9/19/2019	Call with Plaintiff re: Deposition Dates, Update on Status Of Matter	0.8
9/19/2019	Email re: Plaintiff Deposition	0.5
9/25/2019	Bumble's Email re: Depositions	0.3
9/30/2019	Call with Plaintiff re: Deposition Availability and Case Update	1
9/30/2019	Email to Bumble re: Depositions	0.3
10/1/2019	Receive Email re: Plaintiff Deposition and Advise Plaintiff	0.6
10/15/2019	Call with Steve Soliman, Tom Wheeler, And Adrian Bacon re: Plaintiff's Deposition	1
10/15/2019	Prepare Plaintiff for Deposition	2
10/16/2019	Prepare Plaintiff for Deposition	1.5
10/17/2019	Prepare For Plaintiff's Deposition	2.4
10/17/2019	Emails with client	0.5
10/18/2019	Plaintiff's Deposition	7.8
10/18/2019	Emails with co-counsel re depo	0.9
10/18/2019	Call with Tom Wheeler, Adrian Bacon, and Steve Soliman re: Plaintiff's Deposition	1.1
10/21/2019	Summarize notes from deposition of Plaintiff, email to Plaintiff's Counsel	3.8
10/21/2019	Call between Steve Soliman and Adrian Bacon re: Deposition Notes, Class Certification Evidence	1.6
10/22/2019	Email with co-counsel re depo	0.6
11/4/2019	Emails with co-counsel re depo	0.5
11/7/2019	Emails with co-counsel re depo transcript	0.2
11/8/2019	Review Defendant's PMK Transcript, Send Notes to Plaintiff's Counsel	2.8
11/8/2019	Receive Plaintiff's Deposition Transcript, Notes and send to Plaintiff's Counsel	3.8
11/8/2019	Call between Adrian Bacon and Steve Soliman re: Depo Transcript	1
11/14/2019	Draft Declaration re: Adequacy, Review Motion for Class	5.8

<b>Date</b>	<b>Task</b>	<b>Hours</b>
	Certification, Revise	
11/14/2019	Call Between Adrian Bacon and Steven Soliman re: Motion for Class Certification	1
11/20/2019	Call with Plaintiff, Draft Declaration, Obtain Signed Declaration from Plaintiff, Update on Status	2.5
11/24/2019	Emails with client	0.5
11/24/2019	Emails with co-counsel re declaration and depo transcript	0.4
11/25/2019	Review Final Motion for Class Certification, Execute Declaration, Send	3.2
11/26/2019	Call with Todd Friedman, Adrian Bacon, Tom Wheeler, and Steve Soliman re: Next Steps	0.5
12/2/2019	Emails with opposing counsel re status conf stmt	0.7
12/3/2019	Emails with co-counsel and opposing counsel re case	1.1
12/5/2019	Emails with opposing counsel re Motion to Seal	0.8
12/13/2019	Call with Todd Friedman, Adrian Bacon, Tom Wheeler, and Steve Soliman re: Next Steps After Holidays	1.5
12/13/2019	Call with Plaintiff and Steve Soliman re: Status of Matter	1
1/15/2020	Emails with opposing counsel re mediation	0.4
2/19/2020	Emails with co-counsel re case	0.3
2/20/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: Mediators and Mediation	1
2/24/2020	Review MSJ, Notes to Plaintiff's Counsel	5.1
2/24/2020	Call with Plaintiff, Update re: MSJ, Status	1.4
2/24/2020	Call with Adrian Bacon and Steve Soliman re: MSJ	1
3/15/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: MSJ, Mediation, Discovery	1.2
3/15/2020	Call with Plaintiff and Steve Soliman re: Status of Matter	1.4
4/10/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: MSJ, Mediation, Discovery	1
4/10/2020	Call with Plaintiff and Steve Soliman re: Status of Matter	0.6
5/12/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: Mediation Call	1.2
5/12/2020	Call with Plaintiff and Steve Soliman re: Status of Matter	0.5
6/3/2020	Emails with JAMS re mediation	0.3

<b>Date</b>	<b>Task</b>	<b>Hours</b>
6/5/2020	Emails with JAMS re mediation	0.3
6/6/2020	Emails with client re mediation	0.3
6/8/2020	Emails with co-counsel re mediation	0.4
6/10/2020	Emails with co-counsel re discovery and mediation	0.6
6/11/2020	Emails with mediator re case	0.2
6/11/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation Posture	1.5
6/14/2020	Emails with co-counsel re discovery and mediation	0.4
6/17/2020	Emails with co-counsel re case	0.3
6/17/2020	Receive and Review Defendant's Discovery Response	0.5
6/17/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: Mediation Discovery and Proposals	1.5
6/18/2020	Email with JAMS re mediation	0.1
6/18/2020	Email with co-counsel re mediation brief	0.2
6/19/2020	Email with mediator re mediation brief	0.1
6/19/2020	Review and Revise Mediation Brief, Review Discovery	3.2
6/19/2020	Call between Adrian Bacon and Steve Soliman re: Mediation Brief	1
6/19/2020	Call with Plaintiff and Steve Soliman re: Mediation, Mediation Brief	2
6/19/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation Needs	0.4
6/22/2020	Email with co-counsel re case	0.2
6/22/2020	Email with client re mediation	0.2
6/22/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation	1.5
6/23/2020	Emails with co-counsel re case	0.4
6/23/2020	Email with mediator re mediation	0.2

<b>Date</b>	<b>Task</b>	<b>Hours</b>
6/23/2020	Mediation with Adrian Bacon, Todd Friedman, Steve Soliman, Tom Wheeler, Defendant, and Judge Andler	9.1
6/24/2020	Email with mediator re mediation	0.1
6/24/2020	Call with Plaintiff, Update on Mediation and Status	1.2
6/25/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation	0.6
6/29/2020	Email with mediator re mediation	0.1
6/29/2020	Emails with co-counsel re mediation	0.3
6/29/2020	Receive and Review Bumble's Counter from Mediator	0.4
6/29/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Counter	1.4
7/7/2020	Email with opposing counsel re case	0.1
7/8/2020	Email with opposing counsel re case	0.1
7/8/2020	Settlement discussions with opposing counsel	0.5
7/9/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Settlement Call	1
7/15/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: King v. Bumble	1
7/16/2020	Emails with Defendant and Defendant's Counsel In King re: King	2
7/17/2020	Emails with Bumble counsel re King case	0.3
7/17/2020	Emails with opposing counsel re class notice	0.4
7/17/2020	Emails re: King	0.7
7/20/2020	Emails with Defendant re: Stipulation	0.5
7/22/2020	Phone call with opposing counsel re stipulation	0.3
7/22/2020	Emails with opposing counsel re stipulation	0.3
7/23/2020	Emails with opposing counsel re stipulation	0.1
7/23/2020	Research re public accommodation	3.1
7/23/2020	Emails with co-counsel re case	0.1

<b>Date</b>	<b>Task</b>	<b>Hours</b>
7/29/2020	Emails with opposing counsel re stipulation	0.1
7/29/2020	Emails with co-counsel re research	0.6
7/29/2020	Emails with Defendant re: Stipulation	0.6
7/31/2020	Emails with mediator re settlement	0.3
8/6/2020	Emails with mediator re settlement	0.1
8/7/2020	Emails with Defendant re: Stipulation	0.5
8/7/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Status of Matter	1
8/7/2020	Call with Plaintiff and Steve Soliman re: Status	1
8/21/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Status of Matter	0.8
9/1/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Settlement, Next Steps	0.8
9/1/2020	Call with Plaintiff and Steve Soliman re: Settlement, Next Steps	1.2
9/8/2020	Review Settlement Agreement, Notes to Tom Wheeler	2
9/8/2020	Call Between Steve Soliman and Tom Wheeler re: Settlement Agreemen	0.5
9/9/2020	Emails with opposing counsel re release	0.2
9/9/2020	Call Between Todd Friedman, Adrian Bacon, and Steve Soliman re: Fee Demand	1.2
9/10/2020	Emails with opposing counsel re release	0.1
9/17/2020	Emails with mediator re mediation	0.1
9/17/2020	Emails with opposing counsel re case	0.2
9/17/2020	Call Between Todd Friedman, Adrian Bacon, and Steve Soliman re: Fee Demand	1
9/18/2020	Emails with opposing counsel re case	0.1
9/18/2020	Emails with mediator re mediation	0.1
9/18/2020	Review Defendant's Revision to Settlement Agreement, Notes to Co-Counsel	1
9/18/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Revisions to Settlement Agreement and Fees	1.3

<b>Date</b>	<b>Task</b>	<b>Hours</b>
9/23/2020	Emails with opposing counsel re case	0.1
9/28/2020	Emails with opposing counsel re stipulation	0.4
10/5/2020	Emails with co-counsel re mediation brief	0.1
10/6/2020	Emails with opposing counsel case	0.1
10/7/2020	Call with opposing counsel re case	0.2
10/8/2020	Emails with opposing counsel re case	0.2
10/8/2020	Review Mediation Fee Brief, Notes to Plaintiff's Counsel	2.2
10/9/2020	Email with JAMS re mediation	0.1
10/9/2020	Email with JAMS re mediation	0.1
10/9/2020	Call between Tom Wheeler and Steve Soliman re: Mediation Brief	1
10/12/2020	Email with JAMS re mediation brief	0.1
10/12/2020	Email with opposing counsel re settlement	0.2
10/13/2020	Email with opposing counsel re settlement	0.1
10/16/2020	Emails with mediator re mediation	0.2
10/16/2020	Emails with opposing counsel re settlement agreement	0.3
10/16/2020	Mediation with Adrian Bacon, Todd Friedman, Steve Soliman, Tom Wheeler, Defendant, and Judge Andler	3.8
10/16/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation Results and Revised Settlement Agreement	1.4
10/16/2020	Call Between Steve Soliman and Plaintiff re: Settlement	0.8
10/20/2020	Emails with opposing counsel re settlement	0.1
10/23/2020	Emails with opposing counsel re settlement	0.1
10/23/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Settlement Agreement and Status	0.6

<b>Date</b>	<b>Task</b>	<b>Hours</b>
10/28/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Revised Settlement Agreement and Staffing	2
10/29/2020	Emails with co-counsel re case	0.1
11/2/2020	Begin Drafting Motion for Preliminary Approval, Legal Research	5.1
11/2/2020	Call between Todd Friedman and Steve Soliman re: Preliminary Approval Motion	1.2
11/3/2020	Continue Drafting Motion for Preliminary Approval, More Legal Research	6
11/4/2020	Continue Drafting Motion for Preliminary Approval, Exhibits	3.8
11/4/2020	Emails with co-counsel re motion	0.1
11/4/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Preliminary Approval Motion	1
11/5/2020	Emails with opposing counsel re status conf statement	0.2
11/9/2020	Emails with opposing counsel re preliminary approval	0.3
11/9/2020	Finish Initial Draft of Preliminary Approval Motion, Circulate	5
11/11/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Preliminary Approval Motion	0.5
11/12/2020	Emails with co-counsel re case	0.2
11/13/2020	Call between Steven Soliman and Tom Wheeler re: Motion for Preliminary Approval and Settlement Agreement	0.8
11/13/2020	Receive Revisions to Preliminary Approval, Legal Research, Further Revisions	5
11/14/2020	Discussion with client re settlement	0.5
11/15/2020	Emails with co-counsel re case	0.2
11/16/2020	Email with client re settlement	0.2
11/16/2020	Finish further revisions, circulate to rest of Plaintiff's Counsel	1.2

<b>Date</b>	<b>Task</b>	<b>Hours</b>
11/18/2020	Email with co-counsel re settlement	0.2
11/18/2020	Client meeting	3.3
11/18/2020	Call Between Adrian Bacon and Steve Soliman re: Signed Agreement	1
12/1/2020	Call Between Tom Wheeler and Steve Soliman re: Outstanding Documents	0.8
12/2/2020	Emails with opposing counsel re prelim approval	0.1
12/5/2020	Email with co-counsel re prelim approval	0.2
12/6/2020	Draft Declaration re: Preliminary Approval	2.1
12/7/2020	Email with co-counsel re prelim approval	0.2
12/7/2020	Emails with opposing counsel re prel approval	0.1
12/7/2020	Review Current Motion for Preliminary Approval, Circulate Notes	1.4
12/7/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Preliminary Approval Motion	1.2
12/10/2020	Emails with co-counsel re case	0.3
12/15/2020	Emails with opposing counsel re filing	0.1
1/6/2021	Emails with opposing counsel re stipulation	0.1
1/8/2021	Email with court re court order	0.1
1/12/2021	Emails with opposing counsel re stip amended complaint	0.2
1/14/2021	Receive and review Court's tentative ruling and CMO	1
1/14/2021	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Revised Preliminary Approval Order, Staffing	2
1/17/2021	Call with Todd Friedman, Adrian Bacon, Tom Wheeler, and Steve Soliman re: Next Steps, Settlement	1
1/19/2021	Email with co-counsel re court hearing	0.2
1/19/2021	Emails with Public Justice	0.2
1/20/2021	Review Revised Preliminary Approval Motion, Revise Declarations and Send	4



<b>Date</b>	<b>Task</b>	<b>Hours</b>
1/21/2021	Emails with Public Justice	0.4
1/21/2021	Call Between Steve Soliman and Tom Wheeler re: Revised Preliminary Approval Motion	1
2/7/2021	Call with Todd Friedman, Adrian Bacon, Tom Wheeler, and Steve Soliman re: Next Steps, Settlement	1
2/7/2021	Call with Plaintiff and Steve Soliman re: Status of Matter	1.2
3/8/2021	Call Between Tom Wheeler and Steve Soliman re: hearing	0.8
3/16/2021	Emails with co-counsel re settlement	0.2
3/17/2021	Emails with co-counsel re settlement	0.2
3/18/2021	Emails with co-counsel re case	0.1
3/22/2021	Emails with co-counsel re settlement	0.2
3/23/2021	Emails with co-counsel re settlement	0.2
3/24/2021	Emails with co-counsel re settlement	0.1
3/24/2021	Emails with opposing counsel re briefing	0.2
3/25/2021	Emails with opposing counsel re briefing	0.1
3/26/2021	Emails with opposing counsel re briefing	0.1
3/30/2021	Emails with opposing counsel re joint stipulation	0.1
5/5/2021	Review Preliminary Approval Motion and Exhibits In Full, Revise, Send Back to Tom Wheeler	5.4
5/5/2021	Call Between Tom Wheeler and Steve Soliman re: Revisions	1
5/6/2021	Review Final Settlement Agreement, Send to Client	2.4
5/7/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Status	1
5/10/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Status	1
5/11/2021	Emails with opposing counsel re joint status conf stmt	0.1
5/17/2021	Emails with opposing counsel re tentative ruling	0.3
6/2/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Status	0.5

<b>Date</b>	<b>Task</b>	<b>Hours</b>
6/11/2021	Emails with opposing counsel re class notice	0.2
6/22/2021	Emails with opposing/co-counsel counsel re settlement administrator	0.5
6/28/2021	Emails with opposing counsel re data issue	0.1
6/29/2021	Emails with opposing/co-counsel re preliminary approval	0.3
7/1/2021	Emails with Court re Order and Hearing dates	0.1
7/6/2021	Emails with Court re signed order	0.1
7/19/2021	Emails with co-counsel re motion	0.2
7/19/2021	Call Between Steve Soliman and Tom Wheeler re: Fee Motion	0.8
7/19/2021	Call with Plaintiff re: Status of Notice	1.5
7/27/2021	Emails with co-counsel re motion	0.2
7/30/2021	Emails with co-counsel re motion and case	0.8
7/30/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Notice Response	1
8/3/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Notice Response	1.5
8/5/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Notice Response And Approval Motion	1.2
8/9/2021	Emails with co-counsel and class administrator re case	0.3
8/18/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Response Rate	1
8/20/2021	Emails with co-counsel re motion	0.1
8/20/2021	Review Objections, Email Notes to Co-Counsel	2.8
8/23/2021	Call with Steve Soliman and Tom Wheeler re: Declaration and Motion Status	0.5
8/24/2021	Review time records, draft declaration and hours report, review fee motion	6.5
8/24/2021	Call with Steve Soliman and Adrian Bacon re: Declaration	0.8
8/25/2021	Review Motion for Final Approval, exhibits and declaration, legal research, revise	5.2

<b>Date</b>	<b>Task</b>	<b>Hours</b>
8/25/2021	Call Between Steve Soliman and Plaintiff re: Motions	1
8/26/2021	Review Updated Objections, Further Revisions to Motion for Final Approval, Circulate	4.9
8/26/2021	Call with Steve Soliman and Plaintiff re: Declaration and Motion	1
9/1/2021	Call with Plaintiff, Review Draft Declaration, Obtain Signature, Update on Status Of Case	2
9/1/2021	Finalize Revisions to Motion for Fees, Circulate	3.2
9/1/2021	Call Between Todd Friedman, Adrian Bacon, Tom Wheeler, Steven Soliman re: Motions and Deadlines	0.8
9/3/2021	Call between Tom Wheeler and Steve Soliman re: Revisions	1.2
9/8/2021	Call between Tom Wheeler and Steve Soliman re: Motions and New Notice	1
9/9/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Final Approval and Fee Motion, Next Steps RE: Notice	1.2
9/9/2021	Call Between Tom Wheeler and Steve Soliman re: Declarations	1
9/9/2021	Final Review of Motions	3.1
	<b>Total Hours:</b>	313
	<b>Total Fees:</b>	\$211,275