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15 Attorneys for Plaintiff KIRILOSE MANSOUR,  
16 on behalf of himself and all others similarly situated

17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
18 **FOR THE COUNTY OF RIVERSIDE**

19 KIRILOSE MANSOUR, individually on  
20 behalf of himself and all others similarly  
21 situated,

22 Plaintiff,

23 vs.

24 BUMBLE TRADING, INC., a Delaware  
25 corporation; and DOES 1-10, inclusive,  
26 and each of them,

27 Defendants.

28 Case No. RIC1810011

CLASS ACTION

**DECLARATION OF TODD M. FRIEDMAN  
IN SUPPORT OF PLAINTIFF'S FINAL  
APPROVAL OF CLASS ACTION AND  
MOTION FOR ATTORNEYS' FEES,  
COURT COSTS, AND INCENTIVE AWARD**

**Date: October 7, 2021**

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

**Dept: 06**

**Honorable Sunshine S. Sykes**

**DECLARATION OF TODD M. FRIEDMAN**

**I, TODD M. FRIEDMAN, declare:**

1. I am one of the attorneys for the plaintiff in this action, Kirilose Mansour (“Mr. Mansour” or “Plaintiff”). I am an attorney licensed to practice law in the State of California since 2001, the State of Illinois since 2002, and the State of Pennsylvania since 2011. I have been continuously licensed in California since 2001, Illinois since 2002, and Pennsylvania since 2011, and am in good standing with the California State Bar, Illinois State Bar, and Pennsylvania State Bar. I have litigated cases in both state and federal courts in California and Illinois. I am also admitted in every federal district in California and have handled federal litigation in the federal districts of California.

2. The declaration is based upon my personal knowledge, except where expressly noted otherwise.

3. I submit this declaration in support of the Plaintiff’s Motion for Final Approval of Class Action Settlement and Motion Attorneys’ Fees Court Costs and Incentive Award of Class Action Settlement and Certification of Settlement Class in the action against defendant, BUMBLE TRADING, INC. (“Bumble” or “Defendant”).

4. This action was commenced on May 28, 2018, against Defendant, by filing a putative class action complaint asserting causes of action for violations of the California Unfair Competition Law Cal. Bus. & Prof. Code §§ 17200 *et seq.* (“UCL”) and Unruh Civil Rights Act, Cal. Civ. C. §§ 51 *et. seq.* (“UCRA”) against Defendant, on behalf of himself and a proposed class consisting of all male persons in California that purchased Bumble Boost.

5. Defendant filed an Answer on November 8, 2018. Thereafter, the Parties engaged in extended discovery culminating in Plaintiff filing a Motion for Class Certification on November 25, 2019 and Defendant filing a Motion for Summary Judgment on February 14, 2020. The Parties further stipulated that their oppositions to each other’s Motions would be due to be filed at the end of July.

6. After the filing of the Motion for Class Certification and Motion for Summary Judgment, the Parties agreed to attend a mediation with the Hon. Gail Andler (ret.) of ADR Services, an experienced consumer class action mediator. The Parties set the initial mediation for June 23,

1 2020. Defendant provided further information regarding the specific number of Class Members,  
2 which was approximately two million individuals. Plaintiff had other extensive merits and Class  
3 discovery from the formal and informal discovery conducted in the matter.

4 7. At the mediation with Judge Andler (ret.), the Parties solely worked to determine the  
5 amount of consideration to be paid to the Settlement Class, with the issue of attorney's fees and costs  
6 to be discussed later and, if unsuccessful in reaching an agreement, to be handled by contested motion.

7 8. While the Parties did not resolve the case at the mediation, the parties engaged in  
8 subsequent discussions with the assistance of Judge Andler (ret.) regarding the compensation for the  
9 Settlement Class and, with her guidance, reached in an initial agreement on September 10, 2020. No  
10 agreement or discussion as to attorney's fees and costs occurred prior to this date.

11 9. Thereafter, the Parties engaged in further settlement discussions to see if attorney's  
12 fees and costs could be agreed to without the need for contested motion and attended a second  
13 mediation on October 16, 2020 with Judge Andler (ret.) on the issue, wherein Defendant ultimately  
14 agreed to pay an award of up to \$3.25 million in attorney's fees.

15 10. The Parties had begun preparing the written settlement agreement on September 10,  
16 2020 after agreeing to resolve the Class Claims, such that the Parties summarily added in the  
17 agreement regarding attorney's fees and costs, executed the Agreement, and now move for  
18 preliminary approval.

19 11. The Parties agreed to settle on the terms in the Settlement Agreement as set forth  
20 therein, on behalf of a Settlement Class of approximately two million male persons in California who  
21 used the Bumble dating app and self-identified as interested in women on the app from May 29, 2016  
22 to the present. Plaintiff's counsel is satisfied the information provided about the number of persons  
23 in the Settlement Class is correct.

24 12. Plaintiff has also conducted formal discovery regarding Plaintiff's claims and  
25 Defendant's defenses.

26 13. Pursuant to the Settlement Agreement, those persons in the Settlement Class will  
27 receive a universal participation component of 20 Super Swipes (valued at \$31.98) and pro rata  
28 distribution from the Common Fund after payment of costs, administration costs, and any incentive  
payment. Settlement Class Members who do not have an active Bumble app account or who do not

1 want the 20 Super Swipes and file a claim may opt to instead receive two portions of the pro rata  
2 share.

3 14. The Common Fund will be apportioned in an equal manner to each Settlement Class  
4 Member. The amount of the check shall be calculated by the Claims Administrator on a pro-rata  
5 basis. The Common Fund shall equal \$3,000,000 minus all payments for the class representative  
6 Service Award, the Settlement Administrator Expenses, and costs of Litigation not to exceed \$50,000.  
7 (Settlement Agreement at § 3.3). The Common Fund will be distributed among the Settlement Class  
8 Members who file a written claim. (Settlement Agreement at § 3.3-3.4). Each Class Member's  
9 Individual Settlement Payment will be in an equal amount, made on a pro rata basis to each Settlement  
10 Class Members during the Class Period, as determined from the Class Information provided to the  
11 Settlement Administrator by Defendant. The dollar value of each Individual Settlement Amount shall  
12 be determined by dividing the Common Fund by the total number of Valid Claims, adjusted for the  
13 Super Swipe election which permits Settlement Class Members who do not have an active Bumble  
14 app account or who do not want the 20 Super Swipes may opt to instead receive two portions of the  
15 pro rata share. (Settlement Agreement at § 3.4). In addition to the Common Fund, the Settlement  
16 Administrator will separately invoice the Defendant, and the Defendant will pay to the Settlement  
17 Administrator up to \$100,000 for the reverse look up of contact information (email addresses and/or  
18 physical addresses), for former Bumble dating app users for whom Defendant only has telephone  
19 numbers as contact information and therefore cannot provide the initial notice by email or through  
20 the Bumble dating app. (*Id.* at § 3.3).

21 15. As part of that Settlement Agreement, Defendant will make a payment of \$3,000,000  
22 as the monetary settlement benefits for all Valid Claims. Defendant will also separately pay all  
23 separately negotiated attorneys' fees as approved by the Court up to \$3,250,000, with any amount not  
24 approved by the Court to be distributed with the Common Fund.

25 16. The Settlement Class Members were notice by email explaining they are entitled to  
26 receive settlement benefits. Such individuals are part of the members of the Settlement Class and are  
27 entitled to a monetary payment, in the form of a cash distribution, as well as a no claim necessary  
28 universal benefit of 20 free Super Swipes. For any Settlement Class Member for whom Defendant  
does not have a valid email address and has an active Bumble dating app account, Defendant provided

1 notice through the Bumble dating app via a push notification. For the approximately 464,000  
2 Settlement Class Members who are former Bumble users for whom only a telephone number is  
3 known, the Settlement Administrator conducted a reverse lookup using his phone number to identify  
4 an email address and email a copy of the Class Notice to the Settlement Class Member at that email  
5 address. If no email address was available, the Settlement Administrator identified a mailing address  
6 and mail a copy of the Class Notice to the Settlement Class Member. These efforts are addressed in  
7 the contemporaneous Declarations of Defendant and the Class Administrator.

8 17. Defendant shall provide class benefits of approximately \$67 million, composed of  
9 \$31.98 in Super Swipes automatically distributed to each Settlement Class Member and an additional  
10 \$3,000,000 Common Fund for Valid Claims. The Settlement Class Members who submit a Valid  
11 Claim stand to receive a cash payment from the Common Fund in the form of an electronic payment  
12 or check at his option per Approved Claim, on a pro rata basis after deducting Settlement Costs.

13 18. Costs of litigation, notice, and claims administration are being paid by the Defendant  
14 from the Common Fund. Attorney's fees were negotiated separately and are being paid separate from  
15 this amount.

16 19. Any incentive payment awarded to the Representative Plaintiff, Mr. Mansour, any  
17 attorneys' costs awarded to Class Counsel, and certain expenses including Claims Administration  
18 Costs, are to be paid from the Total Settlement Amount by Defendant as follows:

19 a. Administration Expenses and payment of notice, now estimated by P&N to be  
20 approximately \$280,337, but which would increase with a higher claims rate, less the \$100,000 in  
21 additional costs paid separately by Defendant for reverse lookup;

22 b. Incentive/Service Award to Plaintiff in an amount up to \$10,000; and,

23 c. Payment of reasonable and appropriate costs of litigation (to be itemized), not to exceed  
24 \$50,000.

25 20. The costs of notice by mail and claims administration will be paid as part of the  
26 Common Fund. The claims administrator has estimated that this expense will be approximately  
27 \$280,337, with approximately \$104,066 consisting of postage costs and \$100,000 of this amount being  
28 billed separately to Defendant for reverse lookup costs as agreed.

1           21.     The proposed Settlement contemplates that Class Counsel will request an incentive  
2 award in the amount of \$10,000 to Mr. Mansour, as proposed by Class Counsel, subject to Court  
3 approval. Defendant has agreed not to oppose a request for such incentive award in the agreed-upon  
4 amount. The settlement is not contingent on this incentive award being approved and is subject to the  
5 discretion of the Honorable Court.

6           22.     The proposed Settlement contemplates that Class Counsel shall be entitled to apply to  
7 the Court for an award of attorneys' fees, costs, and expenses with the costs and expenses to be paid  
8 from the Common Fund and the attorneys' fees to be paid separately as they were negotiated  
9 separately. Defendant has agreed not to oppose an application by Class Counsel for an award of  
10 attorneys' fees up to \$3,250,000. I believe the excellent results of this Settlement warrant attorney's  
11 fees in this amount. Class Counsel also intend to request that the costs of litigation and any costs of  
12 Notice and Claims administration, to be paid from the Common Fund. Class Counsel further intend to  
13 also ask for costs of litigation not to exceed \$50,000, and in the amount of \$16,714.27 as set forth  
14 below, to be paid from the Common Fund.

15           23.     In the event that, after a period of 180 days following the last distribution of pro rata  
16 shares from the Common Fund, there remains any residual funds in the Common Fund, the Settlement  
17 administration will distribute any such funds to a *cy pres* recipient, proposed to be Public Justice.

18           24.     Public Justice has been a designated recipient of *cy pres* by Plaintiff's counsel  
19 previously and Public Justice has submitted *amici* briefs in a few appellate cases Plaintiff's counsel  
20 has previously had regarding consumer rights. Moreover, neither Plaintiff nor Plaintiff's counsel has  
21 any relationship with Public Justice.

22           25.     I am unaware of any conflict of interest between Plaintiff and any putative class  
23 member or between Plaintiff and Plaintiff's attorneys.

24           26.     As reflected in my hours report, I have spent a significant amount of time fielding calls  
25 and emails from excited Class Members who wanted more information about the case or on how to  
26 submit a claim.

27           27.     As discussed in the Claims Administrator's Declaration, we have received 214 opt outs  
28 and 97 "objections" so far. For the reasons set forth in the forthcoming stipulation, the Parties are  
requesting the claims, opt out, and objection window be extended to provide time for the newly noticed

1 Class Members who received direct email notice for the first time between September 7 and 9, 2021  
2 have the chance to exercise their rights under the Settlement Agreement.

3 28. I have reviewed the 86 “objections” and discuss them in the memorandum of points  
4 and authorities as well. To summarize here as well, 66 of the “objections” object to the existence of  
5 the case generally, advocating on behalf of Defendant that the claims are weak, defenses are strong,  
6 or that the litigation should not have been filed. These objections are actually highly supportive of  
7 Class Counsel’s analysis of why this settlement is fair and reasonable due to the significant risks and  
8 problems present in the litigation.

9 29. 12 of the “objections” are general comments that do not object to the settlement, with  
10 three indicating they actually want to be excluded rather than objecting.

11 30. Of the remaining 8 “objections” which actually convey some objection to the  
12 settlement, they are as follows:

- 13 a. One states that “Plaintiffs counsel should not receive more in attorneys fees than the  
14 class receives in total benefit” and “\$30 is [in]sufficient” to compensate me for my  
15 injury[] \$100 pro rata would be sufficient” and another states “This lawsuit gives \$30  
16 to the Bumble members and \$3.25 million to the attorneys. I object to any settlement  
17 that gives this money to the law firms. I do not believe this is an acceptable settlement  
18 and strongly object to this. This looks to be a frivolous extortion for the sole benefit of  
19 the law firm.” The total benefit received by the Class is approximately \$76 million,  
20 encompassed by \$31.98 in Super Swipes automatically provided to each Class  
21 Member, \$3,000,000 in a common fund against which a Class Member may submit a  
22 valid claim, and the intangible benefit from Bumble adopting the “reactions” feature as  
23 a solution to the alleged discriminatory practice. This significantly exceeds the \$3.25  
24 million sought by Plaintiff’s attorneys in fees for litigating this matter, which is already  
25 subject to review under the appropriate standards by the Court in the Motion for Fees  
26 and justified based off the lodestar and a risk multiplier. Additionally, based on the  
27 number of claims submitted as of today, a Class Member who submitted a claim for  
28 one pro rata share would receive between \$72.60 (if everyone else filed for two shares)  
and \$145.20 (if no one filed for two shares) and between \$145.20 (if everyone filed for  
two shares) and \$290.40 (if no one else filed for two shares) if they filed a claim for  
two pro rata shares. Accordingly, presuming the first objector filed for two shares  
instead of super swipes, their benefit would exceed \$100 as requested. As a note, these

1 claims numbers are not final and Plaintiff expects a significant amount of additional  
2 claims to be filed following the additional notice being sent out. The second objector  
3 additionally declares the lawsuit “frivolous,” which is supportive of Class Counsel’s  
4 arguments for settlement.

5 b. One states that it is an “[i]nadequate amount of compensation for the vast user base  
6 (12.3m).” The Settlement Class is explicitly limited to two years of heterosexual male  
7 users in California, such that this estimate of the number of users is wrong. As the  
8 objection does not otherwise explain why or how it is inadequate, Class Counsel would  
9 point to their arguments explaining how it is a fair and reasonable settlement.

10 c. One states that “The discrimination is a structural component of the app. The remedy  
11 should be a structural change- a rule- that rebalances the field of play; not necessarily  
12 eliminating the female first messaging rule, but giving men seeking women either a  
13 lower fee rate or other benefit.” The Settlement Class includes individuals who are  
14 using the free portion of the Bumble app, such that there can be no lower fee. As part  
15 of the Settlement, Defendant has additionally agreed to implement a “reactions”  
16 feature, which is an “other benefit” to attempt to address the discrepancy.

17 d. One states that “Inadequate for me, I don't want 20 super swipes, been a member for  
18 awhile and i haven't received any messages, I feel hurt and discriminated against.. I'm  
19 seeking restitution for emotional damage and injunctive relief.” As explained above,  
20 this individual could opt out of super swipes and receive two pro rata shares of the  
21 Common Fund if they do not want super swipes. To the extent he feels that he is  
22 particularly aggrieve, he could also opt out and pursue his claim against Defendant  
23 himself. He does not otherwise specifically state an objection against the terms of the  
24 Settlement which can be responded to.

25 e. Finally, one states that “I do no think we should settle this case,” another “I am exercise  
26 my right to object. I dont like the terms of the settlement,” and another “is unfair and  
27 inadequate,” which do not provide an argument for Class Counsel to respond to except  
28 to state that the reasons why this case should be settled are laid out in the Motion papers.

31. To the extent that additional objections arrive after the filing of this Motion but prior  
to the objection deadline, Class Counsel will address such further objections in Plaintiff’s Reply brief.



1 **CLASS COUNSEL’S EXPERIENCE**

2 32. The Law Offices of Todd M. Friedman, P.C. seeks appointment as Class Counsel in  
3 this Action. I am informed and believe that Class Counsel are qualified and able to conduct this  
4 litigation as a class action.

5 33. As one of the main plaintiff litigators of consumer rights cases in Southern California,  
6 I have been requested to and have made regular presentations to community organizations regarding  
7 debt collection laws and consumer rights.

8 34. I have extensive experience prosecuting cases related to consumer issues. My firm,  
9 The Law Offices of Todd M. Friedman, P.C., in which I am a principal, has litigated over 1000  
10 individual based consumer cases and litigated over 100 consumer class actions. These class actions  
11 were litigated in federal courts in California, as well as California State Courts. Approximately 100%  
12 percent of my practice concerns consumer litigation in general, with approximately 90% of my class  
13 action experience involving consumer protection, and approximately 10% percent of my class action  
14 practice involves litigating claims under the UCL, FAL and/or CLRA.

15 35. My firm has been approved by courts as adequate class counsel on numerous  
16 occasions and is highly experienced in litigating UCL class actions.

17 36. Therefore, my experience in litigating class actions and my years in practice allow me  
18 to provide outstanding representation to the Settlement Class. I will continue to strive to fairly,  
19 responsibly, vigorously and adequately represent the putative class members in this action.

20 37. I am unaware of any conflicts of interest between Plaintiff and putative class members  
21 and between proposed class counsel and the other parties to this litigation.

22 38. The Law Offices of Todd M. Friedman has served as plaintiff’s counsel in at least the  
23 following class actions where a settlement was reached on a class-wide basis and has achieved over  
24 \$200,000,000 in class-wide relief for consumers and employees.

- 25 a. *Dancer v. L.A. Times*, Case No. BC472154 (Los Angeles County Superior Court)  
26 (common fund class-wide settlement of \$3 million to \$4 million granted final  
27 approval);
- 28 b. *Couser v. Comenity Bank*, Case No. 3:12-cv-02484-MMA-BGS (S.D. Cal.) (\$8.475  
million class-wide settlement achieved and granted final approval);

- 1 c. *Stemple v. QC Financial Services Group of California, Inc.*, Case No. 3:12-cv-01997-  
2 CAB-WVG (S.D. Cal.) (certified class achieved by motion, and subsequent class-wide  
3 settlement of \$1.5 million achieved, with final approval granted);
- 4 d. *Couser v. Apria Healthcare, Inc.*, Case No. 8:13-cv-00035-JVS-RNB (C.D. Cal.)  
5 (common fund class-wide settlement of \$400,000 to \$750,000, granted final  
6 approval);
- 7 e. *Abdeljalil v. General Electric Capital Corporation*, Case No. 12-CV-02078-IEG-  
8 RBB (S.D. Cal.) (class-wide settlement with common fund of \$6.125 million  
9 achieved, preliminary approval granted, final approval granted);
- 10 f. *Fox v. Asset Acceptance*, Case No. 3:13-CV-00922-DMS-BGS (S.D. Cal.) (common  
11 fund of \$1 million in class-wide relief achieved, granted final approval);
- 12 g. *Friedman v. LAC Basketball Club, Inc.*, Case No. 2:13-cv-00818-CBM-AN (C.D.  
13 Cal.) (class-wide settlement achieved and granted final approval);
- 14 h. *Gerich et al. v. Chase Bank USA et al.*, Case No 1:12-cv-5510 (N.D. Ill.) (class-wide  
15 settlement of \$34 million, granted final approval);
- 16 i. *Than Zaw v. Nelnet Business Solutions Inc., et al.*, Case No. 3:13-cv-05788 (N.D. Cal.)  
17 (Penal Code § 632 class – achieved class-wide settlement of \$1,188,110, granted final  
18 approval of court);
- 19 j. *Medeiros, et al. v. HSBC Card Services Inc., et al.*, Case No. 2:15-cv-09093-JVS-  
20 AFM (C.D. Cal.) (common fund settlement of between \$4.5 million and \$6.5 million  
21 achieved, final approval granted);
- 22 k. *Ann Fox v. Spectrum Club Holding Company et al.*, Case No. 2:14-CV-06766-PSG-  
23 FFMx (class-wide settlement, final approval granted);
- 24 l. *Sayan Aboudi v. T-Mobile USA, Inc.*, Case No. 3:12-cv-02169-BTM-NLS (class-wide  
25 settlement in TCPA case, with common fund of \$2.5 million to \$5 million);
- 26 m. *Andrew Roseman v. BGASC, LLC, et al.*, Case No. EDCV 15-1100-VAP (SPx) (C.D.  
27 Cal.) (class-wide relief achieved, final approval granted);
- 28 n. *Everado Gonzalez v. The Scotts Company*, Case No. BC577875, Consolidated with  
Case No: BC570350 (Los Angeles County Superior Court) (class-wide settlement of

1 \$925,000 in wage and hour class action on behalf of approximately 603 employees  
2 achieved, final approval granted);

3 o. *Payton v. Luxe Valet*, Case No. BC588462 (Los Angeles County Superior Court)  
4 (class-wide settlement in wage and hour independent contractor misclassification class  
5 action, on behalf of 1,800 employees, settled for \$2.4 million, final approval granted);

6 p. *Shelby v. Two Jinn, Inc.*, Case No. 2:15-cv-03794-AB-GJS (C.D. Cal.) (EFTA class  
7 action involving no cognizable actual damages, with net worth of company of \$25  
8 million, settled for non-reversionary common fund of \$457,000, despite liability under  
9 15 U.S. Code § 1693m(a) likely being only \$250,000; final approval granted, zero  
10 objections);

11 q. *Couser v. Dish One Satellite*, Case No. 5:15-cv-02218-CBM-DTB (C.D. Cal.) (TCPA  
12 class action, final approval granted);

13 r. *Couser v. Dish One Satellite*, Case No. RIC 1603185 (Riverside S.C.) (Penal Code  
14 632 class action, final approval granted);

15 s. *De La Paz v. Accurate Courier NCA LLC*, Case No. 16CV00555 (Santa Cruz County  
16 Superior Court) (PAGA and Labor Code class action, final approval granted);

17 t. *Ross v. Zurixx LLC*, Case No. 34-2016-00190874 (Sacramento County Superior  
18 Court) (UCL, FAL and CLRA class action alleging false advertising for real estate  
19 educational courses, non-reversionary common fund settlement for over \$600 per  
20 class member, final approval granted);

21 u. *Eubank v. Terminix International, Inc., et al.*, Case No. 3:15-cv-00145-WQH-JMA  
22 (S.D. Cal.) (PAGA settlement reached in wage and hour action on behalf of pest  
23 control technicians, final approval granted);

24 v. *Holland v. Tenet Healthcare Corporation*, Case No. 15CVP0226 (San Luis Obispo  
25 County Superior Court) (PAGA settlement reached in wage and hour action on behalf  
26 of nurses, final approval granted);

27 w. *Jonathan Weisberg v. HD Supply, Inc.*, Case No. 15-cv-08248-FMO (MRWx) (C.D.  
28 Cal.) (class-wide settlement in TCPA class action, settled for \$1.225 million, final  
approval granted);

- 1 x. *Miler v. Pacific Auto Wash Partners*, Case No. 30-2015-00813013-CU-OE-CXC  
2 (wage and hour class action, final approval granted);
- 3 y. *Sonia Barrientos v. Law Office of Jeffrey H. Jordan*, Case No. 2:15-cv-06282-JAK-  
4 GJS (C.D. Cal.) (FDCPA/RFDCPA letter class action, settled on class wide basis, final  
5 approval granted);
- 6 z. *Tahmasian v. Midway Rent A Car*, Case No. 30-2015-00813013-CU-OE-CXC (Los  
7 Angeles County Superior Court) (PAGA and Labor Code class action, final approval  
8 granted);
- 9 aa. *Craig Cunningham v. Lexington Law Firm*, Case No. 1:17-cv-00087-EJF (N.D. UT)  
10 (TCPA class action MDL involving solicitation prerecorded voice calls made by a  
11 third party, vicarious liability alleged, final approval granted);
- 12 bb. *Sheena Raffin v. Medcredit, Inc., et al.*, Case No. 2:15-cv-04912-MWF-PJW (C.D.  
13 Cal.) (Cal. Penal Code § 632.7 class action certified by Hon. George H. King Ret  
14 under Rule 23(b)(2) and (b)(3) by contested motion on behalf of 11,000 class members  
15 whose calls were recorded without knowledge or consent, settled for \$5 million, final  
16 approval granted);
- 17 cc. *Fernandez v. Reliance Home Services, Inc.*, Case No. BC607572 (Los Angeles County  
18 Superior Court) (wage and hour plus PAGA class action, final approval granted);
- 19 dd. *Anne Wolf v. Hewlett Packard Company*, Case No. 5:15-cv-01221-TJH-GJS (C.D.  
20 Cal.) (CLRA class action certified by contested motion on behalf of tens of thousands  
21 of class members who purchased printer that was falsely advertised to include Smart  
22 Install feature, settled on a wider multi-state, multi-product basis, final approval  
23 granted);
- 24 ee. *Jaylinda Girardot, et al. v. Bail Hotline Bail Bonds, Inc.*, Case No. BC700131 (Los  
25 Angeles County Superior Court) (wage and hour plus PAGA class action, final  
26 approval granted);
- 27 ff. *Ryoo Dental, Inc. v. OCO Biomedical, Inc.*, Case No. 8:16-cv-01626-DOC-KES (C.D.  
28 Cal.) (TCPA fax blast class action, settled on class wide basis, final approval granted);
- gg. *Wondra Curtis v. The Anthem Companies, Inc.*, Case No. 8:16-cv-01654-DOC-JCG

1 (C.D. Cal.) (wage and hour class action for off the clock work, settled on class wide  
2 basis, final approval granted);

3 hh. *Weinberg v. Clariant, Inc.*, Case No. 56-2017-00494914-CU-NP-VTA (Ventura  
4 County Superior Court) (Rosenthal Fair Debt Collection Practices Act class action  
5 settled on behalf of 1,830 class members for privacy infringements through clear  
6 envelope debt collection letters, final approval granted);

7 ii. *Aliav v. Sunset Eats, LLC*, Case No. BC655401 (Los Angeles County Superior Court)  
8 (false advertising class action on behalf of approximately 10,000 class members,  
9 settled on class wide basis; final approval granted);

10 jj. *Alfred Zaklit, et al. v. Nationstar Mortgage LLC*, Case No. 5:15-cv-02190-CAS-KK  
11 (C.D. Cal.) (Cal. Penal Code § 632.7 class action certified by contested motion under  
12 Rule 23(b)(2) and (b)(3) on behalf of over 40,000 class members whose calls were  
13 recorded without knowledge or consent, final approval granted);

14 kk. *Mark Silva v. Olson and Co. Steel*, Case No. 17CV001045 (Contra Costa County  
15 Superior Court) (wage and hour class action settled on behalf of 563 class members,  
16 final approval granted);

17 ll. *Cohen v. Coca-Cola Refreshments, USA, Inc.*, Case No. 2:19-cv-04083-JAK (PLAx)  
18 (C.D. Cal.) (wage and hour class action settlement on behalf of trucking employees,  
19 preliminary approval pending);

20 mm. *Manopla v. Home Depot USA, Inc.*, Case No. 15-1120 (D. N.J.) (TCPA class action,  
21 final approval granted);

22 nn. *Bonilla, et al. v. Windsor Fashion, LLC*, Case No. CIVDS1723088 (wage and hour  
23 class action settled on behalf of over 5,000 employees, preliminary approval granted);

24 oo. *Cawthorne v. Rush Truck Centers of California, Inc.*, Case No. 5:17-cv-1541-JGB-SP  
25 (C.D. Cal.) (wage and hour class action on behalf of 560 employees, final approval  
26 granted);

27 pp. *Lizama v. Medical Data Systems, Inc.*, Case No. 34-2017-00210986-CU-NP-GDS  
28 (Sacramento County Superior Court) (Penal Code 632.7 class action alleging illegal  
call recording, settled for \$2.2 million on behalf of over 30,000 consumers, final

- 1 approval granted);
- 2 qq. *Romano v. SCI Direct, Inc., et al.*, Case No. 2:17-cv-03537-ODW-JEM (C.D. Cal.)  
3 (wage and hour class action for independent contractor misclassification, settled for  
4 \$2.5 million on behalf of 230 employees, final approval granted);
- 5 rr. *Edward Makaron v. Enagic USA, Inc.*, Case No. 2:15-cv-05145-DDP-E (C.D. Cal.)  
6 (TCPA class action certified on behalf of approximately 2,000,000 class members  
7 under Rule 23(b)(2) and 23(b)(3), subsequently settled on a Rule 23(b)(2) and 23(b)(3)  
8 basis, final approval granted);
- 9 ss. *Audrey Hernandez v. Pegasus Building Services, Inc.*, Case No. 37-2018-00023176-  
10 CU-OE-CTL (San Diego County Superior Court) (consolidated wage and hour and  
11 PAGA class action on behalf of janitorial workers, final approval granted);
- 12 tt. *Walsh v. Fry's Electronics, Inc.*, Case No. MSC18-01681 (Contra Costa County  
13 Superior Court) (Gift Card Act, CLRA, UCL, FAL class action settled for class-wide  
14 public injunctive relief, preliminary approval pending);
- 15 uu. *In RE HP Firmware Update Litigation*, Case No. 5:16-cv-05820-EJD (N.D. Cal.) (co-  
16 lead class counsel in consolidated Unfair Competition class action alleging HP pushed  
17 a firmware update on consumers' printers that blocked their ability to use third party  
18 ink cartridges, final approval granted);
- 19 vv. *Nishimoto v. T&S Business Corporation*, Case No. 34-2017-00211426 (Sacramento  
20 County Superior Court) (wage and hour and PAGA class action on behalf of janitorial  
21 workers, final approval granted);
- 22 ww. *Rodriguez v. Experian Information Solutions, Inc., et al.*, Case No. 2:15-cv-01224-  
23 RAJ (W.D. Wash.) (FCRA class action for improper credit pulls; certified under Rule  
24 23 by contested motion, and settled on class-wide basis, final approval granted);
- 25 xx. *Ahmed v. HSBC Bank USA*, Case No. 5:15-cv-02057-FMO (SPx) (C.D. Cal.) (TCPA  
26 class, final approval granted);
- 27 yy. *Garcia, et al. v. HMS Host, Inc.*, Case No. 17-cv-03069-RS (N.D. Cal.) (wage and  
28 hour class action, final approval granted);
- zz. *Aiken v. Malcolm Cisneros, A Law Corporation*, Case No. 5:17-cv-02462-JLS-SP

1 (C.D. Cal.) (Fair Debt Collection Practices Act class action, settled on class wide basis,  
2 preliminary approval granted);

3 aaa. *Marciano, et al. v. Doordash, Inc.*, Case No. CGC 18-567869 (San Francisco County  
4 Superior Court) (First-filed and co-lead counsel in consolidated gig economy  
5 misclassification class action on behalf of delivery drivers, secured over \$40 million  
6 common fund settlement, largest gig economy class settlement to date, preliminary  
7 approval pending);

8 bbb. *Medina v. Enhanced Recovery Company, LLC*, Case No. 2:15-cv-14342-  
9 JEM/MAYNARD (S.D. Fla.) (TCPA class settlement common fund of \$1.45M, final  
10 approval granted);

11 ccc. *Griffey v. TA Operating, LLC*, Case No. CIVDS1907259 (San Bernardino County  
12 Superior Court) (PAGA settlement \$390,000 settlement approval pending);

13 ddd. *D'Angelo Santana v. Rady Children's Hospital*, Case No. 37-2014-00022411-CU-MT-  
14 CTL (San Diego County Superior Court) (Confidentiality of Medical Information Act,  
15 Cal. Civ. Code § 56, *et seq.* class settlement final approval granted);

16 eee. *Chavis v. Three Group, Inc.*, Case No. 18STCV08737 (Los Angeles County Superior  
17 Court) (wage and hour PAGA settlement on behalf of dancers alleging contractor  
18 misclassification, approval pending);

19 fff. *Hale v. Mana Pro Products, LLC*, Case No. 2:18-cv-00209-KJM-DB (E.D. Cal.)  
20 (false advertising class action, preliminary approval granted);

21 ggg. *Fabricant v. AmeriSave Mortgage Corporation*, Case No. 2:19-cv-04659-AB-AS  
22 (C.D. Cal.) (\$6.25 million common fund TCPA class action settlement, preliminary  
23 approval granted);

24 hhh. *El Nasleh v. California Spaghetti Restaurants, Inc.*, Case No. CIVDS1812587 (San  
25 Bernardino County Superior Court) (wage and hour class action settlement on behalf  
26 of restaurant employees, preliminary approval pending).

27 39. In addition to the present case, my firm also certified the following cases as class  
28 actions by contested motion and was appointed class counsel. I wrote the certification briefs for the  
majority of these cases:

- 1 a. *Anne Wolf v. Hewlett Packard Company*, Case No. 5:15-cv-01221-TJH-GJS (C.D. Cal.)  
2 (class action certified by contested motion on behalf of tens of thousands of class members  
3 who purchased printer that was falsely advertised to include Smart Install feature);
- 4 b. *Caldera v. American Medical Collection Association*, Case No. 2:16-cv-00381-CBM-  
5 AJW (C.D. Cal.) (TCPA class action certified by contested motion);
- 6 c. *Alfred Zaklit, et al. v. Nationstar Mortgage LLC*, Case No. 5:15-cv-02190-CAS-KK (C.D.  
7 Cal.) Cal. Penal Code § 632.7 class action certified under Rule 23(b)(2) and (b)(3) on  
8 behalf of class members whose calls were recorded without knowledge or consent);
- 9 d. *D'Angelo Santana v. Rady Children's Hospital*, Case No. 37-2014-00022411-CU-MT-  
10 CTL (San Diego County Superior Court) (Confidentiality of Medical Information Act,  
11 Cal. Civ. Code § 56, *et seq.*);
- 12 e. *Edward Makaron v. Enagic USA, Inc.*, Case No. 2:15-cv-05145-DDP-E (C.D. Cal.)  
13 (TCPA class action certified on behalf of approximately 2,000,000 class members under  
14 Rule 23(b)(2) and 23(b)(3));
- 15 f. *Rodriguez v. Experian Information Solutions, Inc., et al.*, Case No. 2:15-cv-01224-RAJ  
16 (W.D. Wash.) (FCRA class action for improper credit pulls; certified under Rule 23);
- 17 g. *Sheena Raffin v. Mediacredit, Inc., et al.*, Case No. 2:15-cv-04912-MWF-PJW (C.D. Cal.)  
18 (Cal. Penal Code § 632.7 class action certified by Hon. George H. King Ret. under Rule  
19 23(b)(2) and (b)(3) on behalf of class members whose calls were recorded without  
20 knowledge or consent);
- 21 h. *Stemple v. QC Financial Services Group of California, Inc.*, Case No. 3:12-cv-01997-  
22 CAB-WVG (S.D. Cal.) (certified class achieved by motion, and subsequent class-wide  
23 settlement);
- 24 i. *Abdeljalil v. General Electric Capital Corporation*, Case No. 12-CV-02078-IEG-RBB  
25 (S.D. Cal.) (certified class achieved by motion, and subsequent class-wide settlement);
- 26 j. *Aleksanian, et al. v. Enrich Financial, Inc.*, Case No. BC698829 (Los Angeles County  
27 Superior Court) (certified class under Credit Repair Organization Act, California Credit  
28 Services Act and Federal Credit Repair Organization Act).



1                   **OVERVIEW OF EFFORTS OF THE LAW OFFICES OF TODD M. FRIEDMAN**

2                   **A.       CONTINGENT NATURE OF ACTION**

3                   40.       This action, required the Law Offices of Todd M. Friedman, P.C. to spend time on this  
4 litigation that could have been spent on other matters. At various times during the litigation of this  
5 class action, this lawsuit has consumed my time as well as my firm’s resources. My firm has not been  
6 paid anything for our work on this case since it was filed. It is my opinion that law firms in such a  
7 position expect to receive a multiplier in cases such as these because of the risk taken, the extent to  
8 which firms are unable to take on other cases, the delay in getting paid and the costs we have to  
9 advance.

10                  41.       The Law Offices of Todd M. Friedman, P.C. takes cases on a contingency only basis,  
11 such that no client of ours has ever paid us a hourly rate for the performance of our services.  
12 Defendants in numerous actions, as discussed below, have been ordered to pay our hourly rates as set  
13 forth. Our hourly rates are justified by our experience, expertise, and the customary Laffey Matrix as  
14 discussed subsequently.

15                  **B.       LAW OFFICES OF TODD M. FRIEDMAN, P.C.’S LODESTAR**

16                  42.       Law Offices of Todd M. Friedman, P.C. has maintained contemporaneous time records  
17 since the commencement of this action. To date, my office has incurred 1,644.7 hours of attorney time  
18 for this case,<sup>1</sup> with a total lodestar of \$1,088,667.50. This figure does not include the estimated hours  
19 for appearing at the hearing and overseeing the settlement administration. I anticipate my firm will  
20 expend an estimated 140 hours working on these matters, in addition to the hours described herein.  
21 Mr. Friedman’s billing rate is \$900 per hour in this case, the billing rate for Adrian R. Bacon is \$700  
22 per hour, and the billing rate for Tom Wheeler is \$475 per hour

23                  **C.       LAW OFFICES OF TODD M. FRIEDMAN, P.C.’S COSTS**

24                  43.       My firm has incurred litigation costs in this matter in the amount of \$16,714.27, for  
25 which my firm is seeking reimbursement. These costs are comprised of costs for filing and serving the  
26 complaint, transmitting copies of filings to the Honorable Court via courier service, payment of  
27 mediation fees, court fees, airfare, parking expenses, mileage traveling to court, depositions and  
28 mediation. A full itemized breakdown by date is as follows:

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<sup>1</sup> In calculating these hours, I have excluded time spent by junior associates of my firm, as well as by legal clerks and paralegals. While dozens of hours’ worth of time were spent by such individuals on this case, we have not included those hours in the lodestar calculation

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Type	Date	Amount
Complaint Filing Courier	5/29/2018	\$ 75.50
Complaint Filing Fees	5/29/2018	\$ 1,450.00
Service of Process	5/31/2018	\$ 69.50
Proof of Service Filing Courier Fee	6/1/2018	\$ 25.00
Proof of Service Filing Courier Fee	6/19/2018	\$ 75.50
Notice of Jury Fee Deposit Courier Fee	7/3/2018	\$ 51.50
Jury Fee Deposit	7/3/2018	\$ 150.00
Case Management Conference Courier Fee	7/25/2018	\$ 55.00
Case Management Conference Courtesy Copy Courier	7/25/2018	\$ 20.00
Mileage to CMC from Anaheim Hills to Riverside (1 person)	7/31/2018	\$ 45.60
Parking at CMC	7/31/2018	\$ 4.00
Request for Default Courier Fee	8/6/2018	\$ 55.00
Mileage to CMC from Anaheim Hills to Riverside (1 person)	9/14/2018	\$ 45.60
Parking at CMC	9/14/2018	\$ 4.00
Notice of Default Courier Fee	9/14/2018	\$ 55.00
Service of Process on Delaware Bumble	9/18/2018	\$ 175.00
Proof of Service Filing Courier Fee	9/18/2018	\$ 30.00
Mileage to CMC from Los Angeles to Riverside (1 person)	11/13/2018	\$ 68.34
Parking at CMC	11/13/2018	\$ 4.00
Declaration Courier Fee	1/28/2019	\$ 55.00
Mileage to CMC from Los Angeles to Riverside (1 person)	3/4/2019	\$ 68.34
Parking at CMC	3/4/2019	\$ 3.35
Hotel in Austin for Tom Wheeler (1 person)	10/24/2019	\$ 295.11
Flight from Los Angeles to Austin on Southwest (1 person)	10/24/2019	\$ 545.68

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Ubers to Airport, from Airport to Hotel, from Hotel to Airport, from Airport (1 person)	10/25/2019	\$ 131.78
Local Printing in Austin	10/25/2019	\$ 31.29
Flight from Austin to Los Angeles on Southwest (1 person)	10/25/2019	\$ 384.98
Defendant's Deposition Transcript	11/7/2019	\$ 791.40
Plaintiff's Deposition Transcript	11/8/2019	\$ 607.05
Motion for Class Certification Courier Fee	11/25/2019	\$ 133.50
Notice of Lodging of Documents Under Seal Courier Fee	11/26/2019	\$ 131.50
Mediation Fee for Judge Andler	6/8/2020	\$ 5,550.00
Second Mediation Fee for Judge Andler	9/18/2020	\$ 3,200.00
Stipulation and Order Courier Fee	11/23/2020	\$ 50.00
Motion for Preliminary Approval Courier Fee	12/16/2020	\$ 168.50
Motion for Preliminary Approval Court Fee	12/16/2020	\$ 90.00
Amended Complaint Courier Fee	1/7/2021	\$ 97.00
Second Motion for Preliminary Approval Courier Fee	1/29/2021	\$ 352.50
Confirmatory Discovery Deposition Transcript	2/14/2021	\$ 612.50
Status Conference Statement Courier Fee	4/1/2021	\$ 65.00
Third Motion for Preliminary Approval Courier Fee	5/11/2021	\$ 312.50
Third Motion for Preliminary Approval Courtesy Copy Courier Fee	5/11/2021	\$ 212.50
Proposed Order Filing Courier Fee	5/18/2021	\$ 97.00

Proposed Order Courtesy Copy Courier Fee	5/18/2021	\$ 35.00
Proposed Order Filing Courier Fee	7/1/2021	\$ 97.25
Proposed Order Retrieval Courier Fee	7/26/2021	\$ 137.00

**TOTAL: \$16,714.27**

44. The itemization distinguishes Court filing fees from attorney service fees.

45. The itemization also identifies the mode of transportation, the starting point and destination, and the number of people involved in making the trip.

46. With respect to the overnight accomodation on October 24, 2019, the deposition of Defendant's PMK was in Austin, Texas and began at 10 a.m. The flight from Los Angeles to Austin is approximately three hours, such that there were no flights which would have permitted travel within the same day and the deposition to start on time as scheduled. Plaintiff's Counsel Tom Wheeler was the only individual who took Ubers, flights, and needed the overnight accomodation for the taking of Defendant's PMK deposition.

**D. REASONABLENESS OF HOURLY RATES**

47. The Law Offices of Todd M. Friedman, P.C.'s hourly rates are reasonable in respect to the ranges charged by comparable law firms in the State of California.<sup>2</sup> Mr. Friedman's billing rate is \$900 per hour in this case, the billing rate for Adrian R. Bacon is \$700 per hour, and the billing rate for Thomas E. Wheeler is \$475 per hour.

48. Regarding my rate, I have been practicing law since 2001, and am the managing partner of one of the most active consumer protection law firms in California. I have been counsel of record on hundreds of class action lawsuits, dozens of which have resolved on a class-wide basis. In the past five years alone, The Law Offices of Todd M. Friedman has been counsel on cases totaling over \$200 million in class-wide relief for consumers. Based on the Laffey Matrix, my hourly rate falls within the scope of reasonable fees.

49. Regarding Mr. Bacon's hour rates, he is Partner at the Law Offices of Todd M. Friedman. He has been practicing law since 2011 and have practiced primarily class action litigation.

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<sup>2</sup> See Laffey Matrix attached hereto as Exhibit A.

1 In only his third year of practice he was approved as class counsel, at an hourly billing rate of \$475  
2 per hour in three class action matters that were granted final approval:

- 3 a. *Miller v. Ikea California, LLC*, Case No.: 30-2009 00331682, California Superior  
4 Court County of Orange (\$5.75M class settlement granted final approval and motion  
5 for fees and approved at a rate of \$475 per hour);
- 6 b. *David Paiva et al v. Denny Corporation et al.*, Case No. 37-2010-00103831-CU-OE-  
7 CTL, California Superior Court County of San Diego (granted final approval and  
8 motion for fees and approved at a rate of \$475 per hour); and
- 9 c. *Juan Martinez et al v. Valley Pride, Inc. et al.*, Case No. M108688, California Superior  
10 Court County of Monterey

11 50. Mr. Bacon is responsible for drafting and filing the majority of the Complex Motions  
12 filed by my firm in Class Action cases, as well as managing discovery, taking depositions and  
13 overseeing and engaging in virtually every aspect of litigation as either lead or co-lead counsel in  
14 hundreds of active cases handled by my firm. Mr. Bacon recently successfully achieved class  
15 certification by contested motion in five high profile class actions:

- 16 a. *Sheena Raffin v Mediredit, Inc. et. al.*, Case No. 2:15-cv-04912-MWF-PJW (C.D.  
17 Cal.) (Cal. Penal Code § 632.7 class action certified under Rule 23(b)(2) and (b)(3) on  
18 behalf of approximately 11,000 class members whose calls were recorded without  
19 knowledge or consent); and
- 20 b. *Anne Wolf v Hewlett Packard Company*, Case No. 5:15-cv-01221-BRO-GJS (C.D.  
21 Cal.) (Consumer Legal Remedies Act class action certified on behalf of tens of  
22 thousands of class members who purchased printer that was falsely advertised to  
23 include Smart Install feature);
- 24 c. *Caldera v. American Medical Collection Association*, (C.D. Cal.) Case No. 2:16-cv-  
25 00381-CBM-AJW (TCPA class action on behalf of 30,000-100,000 class members,  
26 certified by contested motion);
- 27 d. *Alfred Zaklit, et. al. v. Nationstar Mortgage LLC*, Case No. 5:15-cv-02190-CAS-KK  
28 (C.D. Cal.) Cal. Penal Code § 632.7 class action certified under Rule 23(b)(2) and  
(b)(3) on behalf of approximately 44,000 class members whose calls were recorded  
without knowledge or consent);
- e. *Edward Makaron v. Enagic USA, Inc.*, Case No. 2:15-cv-05145-DDP-E (C.D. Cal.)  
(TCPA class action certified on behalf of approximately 1,000,000 class members,

1 potential damages over \$3 billion);

2 f. *McCurley and Deforest v Royal Seas Cruises, Inc.* Case No. 17-cv-00986-BAS-AGS  
3 (certified class achieved by motion in TCPA class action on behalf of over 2 million  
4 class members).

5 51. Following class certification, the *Wolf* matter was part of a consolidated class-wide  
6 settlement, spanning both California and Texas. Mr. Bacon was the primary attorney who took the  
7 depositions in the matter, handled motion practice, drafted the motion for class certification, and  
8 argued the motion for class certification court. *Wolf* has a take rate of over 15%, which is almost  
9 unheard of in low per person payout consumer class actions, and zero objections, with final approval  
10 pending.

11 52. The same is true with respect to *Raffin* and *Zaklit*, both of which settled on a class  
12 wide basis. The *Raffin* case settle for one of the largest, if not the largest per person recovery in a  
13 CIPA class action in the history of the statute, where class member who made valid claims will be  
14 receiving over \$3,200 each (post fees and costs). *Raffin* faced particularly hard fought litigation over  
15 three years, including a certification motion, a decertification motion, cross summary judgment  
16 motions, motions to dismiss, motions for judgment on the pleadings, motions to strike, *Daubert*  
17 motions, motions to compel, a contested class notice motion, an appeal to the Ninth Circuit, and other  
18 challenges. Mr. Bacon was the primary attorney on the case and drafted the majority of the motions.  
19 He also oversaw efforts of my firm's four experts on the case, and my firm paid over \$120,000 in costs  
20 out of pocket litigating the matter fighting for the Class before we ultimately were able to reach an  
21 agreement to resolve the matter. Final approval was granted with zero objections.

22 53. Mr. Wheeler is a fifth-year associate at my firm. He has worked extensively on  
23 consumer protection matters, including class actions, during his time at the Law Offices of Todd M.  
24 Friedman, P.C.. His work includes assisting on the *Romano*, *Caldera*, and *Makaron* matters cited  
25 above, all certified class actions which settled on a class-wide basis. He was approved in the *Makaron*  
26 and *Romano* matters at a rate of \$425 per hour. He was also recently approved in December 2020 at  
27 \$425 per hour on a contested motion for sanctions in *McCurley et. al. v. Royal Seas Cruises, Inc.*, No.  
28 17-CV-00986-BAS-AGS, 2020 WL 7074948, at \*2 (S.D. Cal. Dec. 3, 2020). In light of his increasing  
experience, an hourly rate of \$475 is warranted, and is further warranted in light of customary rates  
for associates of his year on the Laffey Matrix.

54. Mr. Bacon and I have been approved at rates of \$625 and \$725 respectively over the  
last few years on roughly a dozen class action settlements, including several published opinions.

1 55. □ In reviewing the customary rates on the Laffey matrix, an increased hourly rate of \$700 □  
2 is warranted for Mr. Bacon and of \$900 is warranted for myself as I am now in my 20<sup>th</sup> year of practice  
3 to account for passage of time and increased experience levels.

4 56. □ *Anticipated Additional Hours Expended for Overseeing Settlement Administration and*  
5 *Final Approval.* I anticipate the Law Offices of Todd M. Friedman, P.C. will incur an additional 140  
6 hours continuing to oversee the continued notice, responding to Class Members, drafting the reply  
7 brief and supplemental documents to reflect increased claims and other responses, preparing for and  
8 appearing at the final approval hearing, and overseeing the settlement administration until completion.

9 57. □ With regard to a bare bones lodestar amount, our firm maintained contemporaneous □  
10 time records on this matter and has attached the current billing records as Exhibit B which reflect  
11 approximately 1644 hours of time and provide a specific breakdown of tasks. My hourly billing rate  
12 is \$900 per hour. The hourly rate of Adrian R. Bacon is \$700 per hour. The hourly rate of Mr. Wheeler  
13 is \$475. Other members of my firm, including junior associates, paralegals and law clerks contributed  
14 to the work on this matter, but their hours have not been included, for the purpose of presenting a  
15 reasonable and conservative figure for the Court. Based on these rates, and the accompanying time  
16 entries for each corresponding individual, the lodestar estimate for this Case is \$1,088,667.50.

17 58. □ Here is a breakdown and summary of the fees incurred by Plaintiff's counsel in □  
18 connection with this Case □

Name	Number of Hours	Rate/Hr	Total
Todd M. Friedman	416	\$900.00	\$374,400.00
Adrian R. Bacon	580.6	\$700.00	\$406,420.00
Tom E. Wheeler	648.1	\$475.00	\$307,847.50
<b>TOTAL</b>	<b>1644.7</b>		<b>\$1,088,667.50</b>

19 59. Plaintiff's Counsel is requesting a reasonable multiplier to the lodestar of 2.5.

20 60. I declare under the penalty of perjury of the laws of the State of California that the  
21 foregoing is true and correct, and that this declaration was executed on September 9, 2021.  
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25 By:   
26 Todd M. Friedman, Esq.

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**EXHIBIT A**  
**Laffey Matrix**



# LAFFEY MATRIX

[History](#)
[Case Law](#)
[See the Matrix](#)
[Contact us](#)
[Home](#)

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

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**EXHIBIT B**  
**Time Records**

**Mansour, Kirilose v. Bumble Trading, Inc.**  
**TIME ENTRIES: Todd M. Friedman, Esq. – Partner**

Date	Task	Hours
5/18/2018	Call between Todd Friedman and Steve Soliman re: Retainer and Case	2.4
5/18/2018	Draft retainer, send initial draft to Steve Soliman	1
5/18/2018	Revise retainer per call, send to Steve Soliman	0.5
5/22/2018	Receive Signed Retainer from Plaintiff, Save To File	0.4
5/23/2018	Update File and Create Events for Complaint Etc.	1.5
5/23/2018	Call between Todd Friedman and Adrian Bacon re: Tasks for new case	1.2
5/24/2018	Call between Todd Friedman, Adrian Bacon, and Steve Soliman re: Complaint and Case	1.6
5/25/2018	Review and Revise Draft Complaint	2.2
5/25/2018	Call between Todd Friedman and Adrian Bacon re: Complaint	0.8
7/20/2018	Prepare and Send Letter to Bumble re: Non-Appearance	1.2
7/20/2018	Call between Todd Friedman and Adrian Bacon re: Letter to Bumble	0.5
7/20/2018	Call Between Adrian Bacon and Todd Friedman re: Initial Status Conference	0.8
7/24/2018	Confirm receipt of letter and diary next steps	0.5
7/25/2018	Call Between Adrian Bacon and Todd Friedman re: Initial Status Conference	1
7/31/2018	Call with Adrian Bacon, Todd Friedman, and Steven Soliman re: Default and Next Steps	2.4
9/14/2018	Call Between Adrian Bacon and Todd Friedman re: Default	1
9/18/2018	Call between Todd Friedman and Adrian Bacon re: Call results	0.5
9/18/2018	Receive voicemail from Bumble, call between Adrian Bacon and Todd Friedman re: response	0.5
9/21/2018	Receive and review response from Bumble	0.5
9/21/2018	Call between Todd Friedman and Adrian Bacon re: Bumble Response	0.6
9/27/2018	Call with Todd Friedman, Adrian Bacon, and Steven Soliman re: Defendant's Counsel and Case Management	1.5
10/4/2018	Call between Adrian Bacon and Todd Friedman re: Proposed Injunctive Relief Ideas	1
10/4/2018	Emails between Adrian Bacon and Tom Wheeler re: Proposed Injunctive Relief	0.5
11/5/2018	Review Joint Status Report	0.5
11/8/2018	Review Defendant's Answer	0.8
11/8/2018	Call with Todd Friedman and Adrian Bacon re: Defendant's Answer	0.8
11/13/2018	Call with Todd Friedman, Tom Wheeler, and Adrian Bacon re: Status Conference	1
12/13/2018	Receive Defendant's Informal Discovery Requests	0.5
1/17/2019	Emails to Defendant re: Informal Discovery	0.6
12/10/2018	Review Protective Order	0.5
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

**TIME ENTRIES: Todd M. Friedman, Esq. – Partner**

Date	Task	Hours
1/18/2019	Email to Defendant re: Discovery Requests	0.5
2/13/2019	Call between Adrian Bacon and Todd Friedman re: Class Info	0.5
2/13/2019	Review Joint Status Report	0.5
2/27/2019	Call with Adrian Bacon and Todd Friedman re: Discovery Responses	1
3/4/2019	Call with Adrian Bacon, Tom Wheeler, and Todd Friedman re: OSC and Status Conference	1.2
3/15/2019	Email to Defendant re: PMK Depo	0.3
5/21/2019	Emails to Defendant re: Deposition Topics	0.6
5/29/2019	Email with Defendant re: Deposition Scheduling	0.3
5/31/2019	Emails with Defendant re: rescheduling Plaintiff's Deposition	0.3
6/4/2019	Call With Tom Wheeler, Adrian Bacon, and Todd Friedman re: Status of Matter, Deposition	0.5
6/12/2019	Email to Defendant re: Rescheduling and Stipulation to Extend	0.6
7/11/2019	Emails re: Rescheduling Deposition Again	0.6
8/2/2019	Emails re: Deposition Dates Being Moved	0.4
8/16/2019	Review Stipulation	0.5
8/20/2019	Receive Copy of Signed Order For Extension Of Time, Update File and Scheduling	1
8/20/2019	Email to Bumble re: Deposition Scheduling	0.4
8/21/2019	Call with Adrian Bacon, Tom Wheeler, and Todd Friedman re: Status of Matter	1
9/9/2019	Email re: Deposition Availability for Bumble and Request For Plaintiff Availability	0.4
9/11/2019	Email to Bumble re: Depositions	0.3
9/11/2019	Emails re: Deposition Scheduling	0.5
9/19/2019	Email to Bumble re: Depositions	0.3
9/19/2019	Email re: Plaintiff Deposition	0.5
9/25/2019	Bumble's Email re: Depositions	0.3
9/30/2019	Email to Bumble re: Depositions	0.3
10/1/2019	Email re: Plaintiff Deposition	0.4
10/3/2019	Call Between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Defendant's Deposition	1.4
10/3/2019	Email to Bumble re: Depositions	0.3
10/15/2019	Call with Tom Wheeler, Adrian Bacon, and Todd Friedman re: PMK Depo	1.2
10/23/2019	Call with Adrian Bacon and Todd Friedman re: Defendant's PMK	0.8
10/23/2019	Call with Tom Wheeler and Todd Friedman re: Defendant's PMK	1.2
10/29/2019	Call with Adrian Bacon and Todd Friedman re: Motion for Class Certification	1.2
11/4/2019	Receive and Review Email From Defendant re: Scheduling	0.4
11/4/2019	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Extension, Case Posture, And Settlement Options	1.4
11/4/2019	Email to Bumble re: Extension Proposal	0.6
11/12/2019	Review Motion for Class Certification, Revise, Update Declaration, Review Evidence	5.2

**TIME ENTRIES: Todd M. Friedman, Esq. – Partner**

Date	Task	Hours
11/12/2019	Call Between Adrian Bacon and Todd Friedman re: Motion for Class Certification	1
11/20/2019	Call with Todd Friedman and Adrian Bacon re: Motion for Class Certification	1.4
11/22/2019	Call with Todd Friedman, Adrian Bacon, and Tom Wheeler re: Motion for Class Certification	0.5
11/22/2019	Email to Defendant re: Confidentiality Designations	0.5
11/22/2019	Receive and Review Email From Defendant re: Sealed Documents	0.2
11/25/2019	Review Motion for Class Certification, Execute Declaration	2.8
11/25/2019	Email Motion to Defendant	0.5
11/26/2019	Call with Todd Friedman, Adrian Bacon, Tom Wheeler, and Steve Soliman re: Next Steps	0.5
12/2/2019	Receive and Review Defendant's Proposed Joint Status Report	0.5
12/3/2019	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Scheduling	0.6
12/3/2019	Email to Defendant with proposed scheduling	0.4
12/13/2019	Call with Todd Friedman, Adrian Bacon, Tom Wheeler, and Steve Soliman re: Next Steps After Holidays	1.5
1/17/2021	Call with Todd Friedman, Adrian Bacon, Tom Wheeler, and Steve Soliman re: Next Steps, Settlement	1
2/7/2021	Call with Todd Friedman, Adrian Bacon, Tom Wheeler, and Steve Soliman re: Next Steps, Settlement	1
2/20/2020	Email with Counsel re: Call	0.8
2/20/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: Mediators and Mediation	1
2/20/2020	Email with Mediators re: Availability	0.5
2/25/2020	Email to Defendant re: Mediator Availability	0.6
2/25/2020	Review Defendant's Emails re: Mediators	0.3
3/15/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: MSJ, Mediation, Discovery	1.2
4/1/2020	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Motion for Summary Judgment, Mediation, and Discovery	2
4/1/2020	Email to Defendant re: MSJ and Scheduling	0.9
4/10/2020	Follow-up Email re: Scheduling	0.3
4/10/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: MSJ, Mediation, Discovery	1
4/20/2020	Follow-up Email re: Scheduling	0.3
4/20/2020	Email re: Scheduling	0.3
4/28/2020	Follow-up Email re: Scheduling	0.3
4/30/2020	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Scheduling, Mediation	1.4
5/11/2020	Emails re: Mediation Call	0.4
5/12/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: Mediation Call	1.2
5/28/2020	Receive and Review Email re: Mediators from Defendant	0.3

**TIME ENTRIES: Todd M. Friedman, Esq. – Partner**

Date	Task	Hours
5/28/2020	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Mediators	0.6
5/29/2020	Email re: Mediator Choice	0.3
6/11/2020	Receive and Review Email from Judge Andler re: Mediation	0.4
6/11/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation Posture	1.5
6/11/2020	Email to Judge Andler re: Availability	0.4
6/12/2020	Pre-Mediation Call with Adrian Bacon and Tom Wheeler with Judge Andler	0.6
6/12/2020	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Info Needed For Mediation	1.2
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	Call between Adrian Bacon and Todd Friedman re: Mediation Brief	1
6/18/2020	Review, Revise Mediation Brief	2.4
6/19/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation Needs	0.4
6/19/2020	Email to Defendant re: Mediation Discovery	0.5
6/19/2020	Email from Defendant re: Mediation Discovery	0.3
6/22/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation	1.5
6/23/2020	Mediation with Adrian Bacon, Todd Friedman, Steve Soliman, Tom Wheeler, Defendant, and Judge Andler	9.1
6/23/2020	Call with Adrian Bacon, Todd Friedman, and Tom Wheeler re: Mediation Results	1
6/25/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation	0.6
6/25/2020	Email to Mediator	0.5
6/25/2020	Call between Adrian Bacon and Todd Friedman re: Mediation	0.4
6/29/2020	Email to Mediator	0.4
6/29/2020	Call between Adrian Bacon and Todd Friedman 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
6/30/2020	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Counter Proposal	1.2
7/1/2020	Emails re: Scheduling Call	0.5
7/2/2020	Call with Adrian Bacon, Todd Friedman, and Tom Wheeler with Defendant re: Counter	0.8
7/2/2020	Call with Adrian Bacon, Todd Friedman, and Tom Wheeler re: Call	0.4
7/9/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Settlement Call	1
7/15/2020	Call with Todd Friedman and Adrian Bacon re: King v. Bumble	1
7/15/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: King v. Bumble	1

**TIME ENTRIES: Todd M. Friedman, Esq. – Partner**

Date	Task	Hours
7/16/2020	Emails with Defendant and Defendant's Counsel In King re: King	2
7/17/2020	Emails re: King	0.7
7/16/2020	Call between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Draft Notice Documents	1
7/17/2020	Review Notice Documents	1
7/20/2020	Call with Todd Friedman and Adrian Bacon re: King Stipulation	1
7/20/2020	Review Stipulation	1
7/20/2020	Emails with Defendant re: Stipulation	0.5
7/22/2020	Call with Adrian Bacon and Todd Friedman re: Settlement Scope	1.5
7/29/2020	Emails with Defendant re: Stipulation	0.6
7/29/2020	Call with Adrian Bacon and Todd Friedman re: Stipulation	0.8
7/31/2020	Call with Bumble re: Other State Class Members	1
7/31/2020	Call with Adrian Bacon and Tom Wheeler re: Other States	1.4
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
8/20/2020	Call Between Adrian Bacon and Todd Friedman re: Settlement	1
8/21/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Status of Matter	0.8
8/31/2020	Call between Todd Friedman and Adrian Bacon re: Settlement	1.6
9/1/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Settlement, Next Steps	0.8
9/1/2020	Call between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Settlement Agreement	1
9/3/2020	Call with Tom Wheeler and Todd Friedman re: Settlement Agreement	0.8
9/3/2020	Call Between Adrian Bacon and Todd Friedman re: Fee Demand	1
9/7/2020	Call Between Todd Friedman and Tom Wheeler re: Settlement Agreement	1
9/7/2020	Review and Revise Settlement Agreement	3
9/9/2020	Call Between Todd Friedman, Adrian Bacon, and Steve Soliman re: Fee Demand	1.2
9/15/2020	Email with Simpluris re: Administrator Bids	0.8
9/15/2020	Email with PNC re: Administrator Bids	0.8
9/15/2020	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Administration	1
9/17/2020	Email with Judge Andler re: Scheduling	0.4
9/17/2020	Receive and Review Defendant's Response to Demand	0.3
9/17/2020	Call Between Todd Friedman, Adrian Bacon, and Steve Soliman re: Fee Demand	1
9/18/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Revisions to Settlement Agreement and Fees	1.3
9/18/2020	Email to Defendant re: Timing on Revisions	0.3
9/18/2020	Email re: Fees to Defendant	0.3
9/23/2020	Review Settlement Agreement	1.2

**TIME ENTRIES: Todd M. Friedman, Esq. – Partner**

Date	Task	Hours
9/23/2020	Call Between Tom Wheeler and Todd Friedman re: Settlement Agreement	1
9/23/2020	Emails re: Stipulation to Withdraw Motions	0.4
9/25/2020	Call Between Todd Friedman, Adrian Bacon, and Tom Wheeler re: Revisions to Settlement Agreement	1.2
10/5/2020	Email re: Second Mediation	0.5
10/6/2020	Emails re: Scheduling Call re Mediation	0.5
10/6/2020	Call between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Call	0.8
10/7/2020	Call with Todd Friedman, Tom Wheeler, and Defendant re: Second Mediation	0.8
10/7/2020	Call between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Call	1.4
10/8/2020	Review Mediation Brief	1
10/8/2020	Call with Adrian Bacon and Todd Friedman re: Mediation Brief	0.8
10/8/2020	Email to Defendant re: Status Conference Date	0.3
10/8/2020	Email with Simpluris re: Updated Bid	0.5
10/9/2020	Call between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Mediation Brief	0.6
10/15/2020	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Mediation	0.8
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
10/20/2020	Email to Defendant re: Agreement	0.3
10/23/2020	Email to Defendant re: Agreement	0.3
10/23/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Settlement Agreement and Status	0.6
10/28/2020	Receive and Review Changes to Settlement Agreement	0.5
10/28/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Revised Settlement Agreement and Staffing	2
10/28/2020	Emails with PNC re: Administration	0.8
10/28/2020	Email re: Scheduling Kick-Off Call with PNC	0.4
10/29/2020	Call Between Todd Friedman and Tom Wheeler re: Settlement Revisions	0.9
10/29/2020	Email to Defendant re: Revisions	0.4
11/2/2020	Email with PNC re: Exhibits	0.5
11/2/2020	Follow-up Email re: Revisions to Defendant	0.2
11/2/2020	Call between Todd Friedman and Steve Soliman re: Preliminary Approval Motion	1.2
11/2/2020	Call between Todd Friedman and Tom Wheeler re: Call Revisions	0.7
11/2/2020	Call with Tom Wheeler, Todd Friedman, and Defendant re: Proposed Revisions	0.8
11/4/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Preliminary Approval Motion	1
11/5/2020	Email to Defendant re: Status Conference Statement	0.4
11/6/2020	Email to Defendant re: Administration Questions	0.6

**TIME ENTRIES: Todd M. Friedman, Esq. – Partner**



Date	Task	Hours
11/6/2020	Call with Adrian Bacon, Tom Wheeler, Todd Friedman, and PNC re: Settlement Administration Kickoff	1
11/6/2020	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Settlement Administration and Next Steps	0.6
11/9/2020	Email to Defendant re: Confirmatory Discovery	0.5
11/10/2020	Call between Todd Friedman, Tom Wheeler, and Adrian Bacon re: Outstanding Issues	0.5
11/10/2020	Receive and Review of Motion for Preliminary Approval, Make Revisions	3.1
11/11/2020	Email with PNC re: Status of Case	0.4
11/11/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Preliminary Approval Motion	0.5
11/12/2020	Call between Todd Friedman, Tom Wheeler, and Adrian Bacon re: Settlement Revisions	1.2
11/12/2020	Email to Defendant re: scheduling and deadlines	0.5
11/12/2020	Review Revised Settlement Documents Ahead of Call	0.6
11/13/2020	Defendant's email re: notice	0.5
11/18/2020	Call Between Adrian Bacon and Todd Friedman re: Signed Agreement	0.8
11/19/2020	Emails with Defendant re: Confirmatory Discovery and Agreement	0.5
11/23/2020	Call between Todd Friedman, Tom Wheeler, and Adrian Bacon re: Outstanding Issues	0.4
11/23/2020	Call between Todd Friedman, Tom Wheeler, and Adrian Bacon re: Motion for Preliminary Approval	1
11/23/2020	Review Revised Motion for Preliminary Approval	1
11/30/2020	Call with Todd Friedman re: Motion for Preliminary Approval	0.8
12/2/2020	Emails with Defendant re: Confirmatory Discovery	0.3
12/4/2020	Review Revisions to Motion	0.8
12/7/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Preliminary Approval Motion	1.2
12/7/2020	Emails with Defendant re: Confirmatory Discovery	0.5
12/15/2020	Emails re: Confirmatory Discovery	0.8
12/18/2020	Emails with PNC re: Administration	0.3
12/24/2020	Emails with Defendant re: Rescheduling	0.5
12/24/2020	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Deposition	0.6
1/6/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Defendant's PMK Deposition, Next Steps	1.4
1/14/2021	Receive and review Court's tentative ruling and CMO	0.8
1/14/2021	Emails with Defendant re: Call	0.4
1/14/2021	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Revised Preliminary Approval Order, Staffing	2
1/15/2021	Call Between Tom Wheeler and Todd Friedman re: Changes Ahead Of Call	1
1/15/2021	Call With Tom Wheeler, Todd Friedman, and Defendant re: Changes	0.7
1/15/2021	Call with Adrian Bacon and Todd Friedman re: Changes	0.8

**TIME ENTRIES: Todd M. Friedman, Esq. – Partner**

Date	Task	Hours
1/19/2021	Review Revised Preliminary Approval Motion and Documents, Review CMO, Notes To File	3.4
1/22/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Revised Preliminary Approval Motion	1.4
1/26/2021	Emails with Defendant re: Status of Declarations	0.6
1/28/2021	Emails with Defendant re: Revisions	0.7
2/1/2021	Email with Defendant re: Website Name	0.3
3/4/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Status of Matter	1
3/5/2021	Receive and review Court's tentative ruling	0.5
3/5/2021	Email Tentative Ruling to PNC	0.3
3/6/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Tentative Ruling	1
3/8/2021	Call Between Adrian Bacon and Todd Friedman re: hearing	1.5
3/12/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: revisions	1
3/17/2021	Email Settlement Agreement Revisions to Defendant	0.8
3/17/2021	Email to Defendant re: Documents	0.3
3/24/2021	Email to Defendant re: Documents	0.4
3/30/2021	Emails with PNC re: Administration Costs	0.6
3/30/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Status of Matter	1.2
4/1/2021	Emails with PNC re: Administration Costs	0.3
4/2/2021	Email with JND re: Administrator Bid	0.7
4/9/2021	Receive and Review JND Administrator Bid	0.6
4/9/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: JND Bid	0.5
4/12/2021	Email Defendant re: JND Bid	0.3
4/21/2021	Emails re: Settlement Administration Bids	0.5
4/28/2021	Review Settlement Agreement Revisions	0.8
4/28/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Notice Language	0.8
4/29/2021	Email to Defendant re: revisions and status	0.5
5/5/2021	Review Preliminary Approval Motion and Exhibits, Redline	4
5/6/2021	Call Between Todd Friedman and Tom Wheeler re: Preliminary Approval Motion	0.8
5/6/2021	Emails with PNN re: Declaration and Administration	1.3
5/7/2021	Emails with PNN re: Administration	0.4
5/7/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Status	1
5/10/2021	Emails with PNN re: Declaration Status	0.5
5/10/2021	Emails with Defendant re: finalizing motion	0.5
5/10/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Status	1
5/17/2021	Review Tentative Ruling	0.5

**TIME ENTRIES: Todd M. Friedman, Esq. – Partner**

Date	Task	Hours
5/17/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Tentative Ruling, Next Steps	1.2
5/17/2021	Email with Defendant re: submission on tentative	0.5
5/17/2021	Email with PNN re: Order	0.6
5/18/2021	Emails with PNN re: Notice	0.5
5/21/2021	Email to PNN with Documents	0.6
5/21/2021	Call with Tom Wheeler, Todd Friedman, PNC, and Defendant re: Notice Kickoff	0.8
6/2/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Status	0.5
6/2/2021	Emails with PNN re: Documents	0.6
6/8/2021	Call between Tom Wheeler, Todd Friedman, PNC, and Defendant re: Data Transfer Status	0.5
6/16/2021	Emails re: Status of Signed Order	0.5
6/16/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Status	0.4
6/22/2021	Email to Court re: Status of Signed Order	0.4
6/22/2021	Emails re: Updated Proposed Order	0.3
6/22/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Status	1
6/28/2021	Emails re: Data Privacy Issue	0.4
7/1/2021	Receive and Respond to Court Email re: Hearing Date	0.5
7/1/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Status	1
7/6/2021	Review Preliminary Approval Order and Calendar Dates	1.4
7/9/2021	Emails re: Claims Administration Deadlines	0.7
7/9/2021	Call Between Tom Wheeler and Todd Friedman re: Claims Administration	0.8
7/19/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Notice and Fee Motion	1.5
7/30/2021	Receive and Respond to Calls and Emails From Class Members	5.1
7/30/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Notice Response	1
8/2/2021	Receive and Respond to Calls and Emails From Class Members	7.2
8/3/2021	Receive and Respond to Calls and Emails From Class Members	5.8
8/3/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Notice Response	1.5
8/4/2021	Receive and Respond to Calls and Emails From Class Members	4.9
8/5/2021	Receive and Respond to Calls and Emails From Class Members	4.2
8/5/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Notice Response And Approval Motion	1.2
8/6/2021	Receive and Respond to Calls and Emails From Class Members	4
8/9/2021	Receive and Respond to Calls and Emails From Class Members	5.8
8/9/2021	Call Between Adrian Bacon and Todd Friedman re: Class Member Responses	1.2
8/10/2021	Receive and Respond to Calls and Emails From Class Members	3.4
8/11/2021	Receive and Respond to Calls and Emails From Class Members	3.2
8/12/2021	Receive and Respond to Calls and Emails From Class Members	1.8

**TIME ENTRIES: Todd M. Friedman, Esq. – Partner**

Date	Task	Hours
8/12/2021	Begin Drafting Motion for Final Approval, Review Legal Research	4.4
8/13/2021	Receive and Respond to Calls and Emails From Class Members	2
8/13/2021	Continue Drafting Motion for Final Approval, Review Docket, Update	5.1
8/16/2021	Receive and Respond to Calls and Emails From Class Members	4
8/16/2021	Call With Adrian Bacon and Todd Friedman re: Final Approval Motion, Class Member Responses	1.2
8/16/2021	Review Exhibits To Final Approval, Begin Drafting New Exhibits	2.4
8/17/2021	Receive and Respond to Calls and Emails From Class Members	2.7
8/17/2021	Begin Drafting Motion for Fees, Legal Research	5.1
8/18/2021	Receive and Respond to Calls and Emails From Class Members	3.1
8/18/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Response Rate	1
8/18/2021	Emails with PNN re: Claims Administration Response	1
8/18/2021	Continue Drafting Motion for Fees, Exhibits	2.1
8/19/2021	Emails with PNN re: Objections	0.7
8/19/2021	Receive and Respond to Calls and Emails From Class Members	2.7
8/20/2021	Receive and Respond to Calls and Emails From Class Members	2.6
8/19/2021	Review Objections, Review Preliminary Approval Order, Continue Drafting Declaration	3.1
8/19/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Objections and Drafting of Final Approval and Fee Motions	1.5
8/20/2021	Review Notes on Objections, Finish Initial Draft of Motion for Final Approval, Circulate	5.2
8/23/2021	Receive and Respond to Calls and Emails From Class Members	3.4
8/20/2021	Emails with PNN re: Claims Administrator Declaration	0.8
8/23/2021	Review Declarations and Exhibits to Motions, Revise, Finalize and Circulate	4.2
8/23/2021	Emails with Defendant and PNN re: Class Notice Rates	1
8/23/2021	Call with Tom Wheeler, Adrian Bacon, and Todd Friedman re: Final Approval and Fee Motion Status	0.8
8/24/2021	Receive and Respond to Calls and Emails From Class Members	2.8
8/25/2021	Receive and Respond to Calls and Emails From Class Members	2.4
8/25/2021	Call Between Todd Friedman and Adrian Bacon re: Motions	1
8/26/2021	Receive and Respond to Calls and Emails From Class Members	2.2
8/26/2021	Emails with PNN re: New Claims Update and Objections	0.7
8/26/2021	Review Updated Objections	0.8
8/26/2021	Emails with Defendant and PNN re: Email Bounceback	0.8
8/26/2021	Review "Final" Objections List, Revise Motion for Final Approval	3.1
8/27/2021	Receive and Respond to Calls and Emails From Class Members	2
8/27/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Motions, Deadlines	1
8/30/2021	Receive and Respond to Calls and Emails From Class Members	3.2
8/30/2021	Call Between Todd Friedman and Adrian Bacon re: Class Member Responses	1.2
8/31/2021	Receive and Respond to Calls and Emails From Class Members	1.9

**TIME ENTRIES: Todd M. Friedman, Esq. – Partner**

Date	Task	Hours
9/1/2021	Receive and Respond to Calls and Emails From Class Members	2
9/1/2021	Call between Todd Friedman and Adrian Bacon re: Motion for Final Approval and Fees	0.8
9/2/2021	Receive and Respond to Calls and Emails From Class Members	1.5
9/2/2021	Review Revisions, Forward To Tom Wheeler	2.2
9/2/2021	Call between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Motions, Deadlines, Claims, Administration	2
9/3/2021	Call between Tom Wheeler and Todd Friedman re: Revisions	1
9/7/2021	Review Proposed Email Language	0.3
9/7/2021	Emails re: Proposed Email Language	0.3
9/7/2021	Respond to Class Members Calls and Emails	6
9/7/2021	Call between Todd Friedman, Tom Wheeler, and Adrian Bacon re: New Notice	1
9/7/2021	Emails with PNC re: Notice Issue	0.5
9/8/2021	Call between Todd Friedman and Tom Wheeler re: Motions for Final Approval and Fees	0.8
9/8/2021	Call between Adrian Bacon and Tom Wheeler re: Motions for Final Approval and Fees	1.5
9/8/2021	Call with Todd Friedman, Tom Wheeler, PNC, and Defendant	0.8
9/8/2021	Respond to Class Members Calls and Emails	6
9/8/2021	Notes to File re: Call	0.4
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	Review Final Draft Motion for Final Approval and For Fees, Revise, Final Approval	3
9/9/2021	Respond to Class Members Calls and Emails	4

**TOTAL TIME – 416**  
**LODESTAR - \$374,400**

**TIME ENTRIES: Todd M. Friedman, Esq. – Partner**

**Mansour, Kirilose v. Bumble Trading, Inc.**  
**TIME ENTRIES: Adrian R. Bacon, Esq. – Partner**

Date	Task	Hours
5/23/2018	Call between Todd Friedman and Adrian Bacon re: Tasks for new case	1.2
5/25/2018	Revise Draft Complaint	1.8
5/25/2018	Call between Todd Friedman and Adrian Bacon re: Complaint	0.8
5/29/2018	Finalize and File Complaint, Send Out for Service	2.3
6/1/2018	Review Case Management Order, Update Dates	1
7/20/2018	Call between Todd Friedman and Adrian Bacon re: Letter to Bumble	0.5
7/20/2018	Call Between Adrian Bacon and Todd Friedman re: Initial Status Conference	0.8
7/31/2018	Travel to and from and attend Initial Status Conference	4.1
7/21/2018	Note to file re: ISC, update dates	0.5
7/25/2018	Draft and File Plaintiff's Case Management Statement	1.7
7/25/2018	Call Between Adrian Bacon and Todd Friedman re: Initial Status Conference	1
7/30/2018	Prepare for Initial Status Conference	1.2
7/31/2018	Call with Adrian Bacon, Todd Friedman, and Steven Soliman re: Default and Next Steps	2.4
8/6/2018	Draft and File Notice of Ruling	1.8
8/6/2018	Draft and File Request for Entry of Default	1.2
9/13/2018	Prepare for Continued Status Conference, Review File	1.8
9/14/2018	Draft and Send Email to Bumble re: Non-Response	1.4
9/14/2018	Travel to and from and attend Continued Status Conference	4.6
9/14/2018	Note to file, update dates	0.5
9/14/2018	Call Between Adrian Bacon and Todd Friedman re: Default	1
9/14/2018	Draft and File Notice of Entry of Default	1
9/14/2018	Call Between Adrian Bacon and Steve Soliman re: Status of Matter	1
9/18/2018	Call between Adrian Bacon and Bumble re: Case	0.6
9/18/2018	Draft email to Bumble's Counsel with attachments, revise, and send	1.2
9/18/2018	Call between Todd Friedman and Adrian Bacon re: Call results	0.5
9/18/2018	Receive voicemail from Bumble, call between Adrian Bacon and Todd Friedman re: response	0.5
9/18/2018	Notes to file re: Call	0.4
9/21/2018	Receive and review response from Bumble	0.5
9/21/2018	Call between Todd Friedman and Adrian Bacon re: Bumble Response	0.6
9/22/2018	Prepare letter, direct service on new address	1
9/22/2018	Notes to file re: Status of Service	0.5
9/24/2018	Order Transcript from 9/14/2018 Hearing	0.8
9/27/2018	Call with Defendant's Counsel re: Appearance and Case Management	1
9/27/2018	Call with Todd Friedman, Adrian Bacon, and Steven Soliman re: Defendant's Counsel and Case Management	1.5
10/1/2018	Review, Revise, and Approve Joint Stipulation To Vacate Default, Email to Defendant	1.8

**TIME ENTRIES: Adrian R. Bacon, Esq. – Partner**

Date	Task	Hours
10/4/2018	Call between Adrian Bacon and Steve Soliman re: Proposed Injunctive Relief Structures	2.2
10/4/2018	Call between Adrian Bacon and Todd Friedman re: Proposed Injunctive Relief Ideas	1
10/4/2018	Notes to file: re Proposed Structures	1.4
10/4/2018	Call between Tom Wheeler and Adrian Bacon re: Proposed Injunctive Relief Structure	0.6
10/4/2018	Emails between Adrian Bacon and Tom Wheeler re: Proposed Injunctive Relief	0.5
11/5/2018	Draft Joint Status Report, Send to Defendant	1.5
11/5/2018	Call with Todd Friedman and Adrian Bacon re: Joint Status Report	0.8
11/5/2018	Call with Defendant re: Joint Status Report	0.5
11/7/2018	Receive Revisions from Defendant, Finalize and File Joint Status Report	1.5
11/8/2018	Review Defendant's Answer, Notes to File	1.2
11/8/2018	Call with Todd Friedman and Adrian Bacon re: Defendant's Answer	0.8
11/12/2018	Call with Adrian Bacon and Tom Wheeler re: Case and CMC	2
11/13/2018	Call with Todd Friedman, Tom Wheeler, and Adrian Bacon re: Status Conference	1
12/13/2018	Receive Defendant's Informal Discovery Requests	0.5
12/20/2018	Call between Steve Soliman and Adrian Bacon re: Informal Discovery Requests	1.5
1/17/2019	Emails to Defendant re: Informal Discovery	0.6
12/10/2018	Receive, Review, Approve Protective Order from Defendant	1.2
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
1/18/2019	Call with Tom Wheeler and Adrian Bacon re: Informal Discovery Requests	1.2
1/18/2019	Draft Email to Defendant re: Discovery Requests, Send	1.2
2/6/2019	Call with Adrian Bacon and Tom Wheeler re: Status of Informal Discovery	1
2/13/2019	Notes to file: re Bumble Class Info	0.5
2/13/2019	Call between Adrian Bacon and Todd Friedman re: Class Info	0.5
2/13/2019	Review Joint Status Report	0.5
2/13/2019	Call with Adrian Bacon and Tom Wheeler re: Scheduling	0.5
2/27/2019	Receive and Review Defendant's Informal Discovery Responses and Documents, Notes to File	3.1
2/27/2019	Call with Adrian Bacon and Todd Friedman re: Discovery Responses	1
2/27/2019	Call with Adrian Bacon and Tom Wheeler re: Discovery Responses, Discovery Needs	0.8
2/27/2019	Call with Adrian Bacon and Steve Soliman re: Discovery	1
3/1/2019	Call with Adrian Bacon, Tom Wheeler, and Steven Soliman re: Status Conference & Scheduling	1
3/4/2019	Call with Adrian Bacon, Tom Wheeler, and Todd Friedman re: OSC and Status Conference	1.2

**TIME ENTRIES: Adrian R. Bacon, Esq. – Partner**

Date	Task	Hours
3/8/2019	Receive Defendant's Further Discovery Responses, Review, Notes to File	2.4
3/8/2019	Call with Adrian Bacon and Tom Wheeler re: Outstanding Discovery, Deposition	1.2
3/15/2019	Email to Defendant re: PMK Depo	0.3
5/21/2019	Call with Adrian Bacon and Tom Wheeler re: Deposition Topics	1.2
5/21/2019	Revise Deposition Topics	1.4
5/21/2019	Emails to Defendant re: Deposition Topics	0.6
5/29/2019	Email with Defendant re: Deposition Scheduling	0.3
5/31/2019	Emails with Defendant re: rescheduling Plaintiff's Deposition	0.3
6/4/2019	Call With Tom Wheeler, Adrian Bacon, and Todd Friedman re: Status of Matter, Deposition	0.5
6/4/2019	Call with Tom Wheeler and Adrian Bacon re: Deposition Scheduling	0.8
6/12/2019	Call with Tom Wheeler and Adrian Bacon re: Scheduling	0.5
6/12/2019	Email to Defendant re: Rescheduling and Stipulation to Extend	0.6
6/13/2019	Review and Revise Stipulation To Extend Class Certification	1
6/26/2019	Call with Tom Wheeler and Adrian Bacon re: Deposition Scheduling Issues	1.5
7/11/2019	Emails re: Rescheduling Deposition Again	0.6
7/11/2019	Call with Tom Wheeler and Adrian Bacon re: Deposition Scheduling Issues	0.8
8/2/2019	Emails re: Deposition Dates Being Moved	0.4
8/16/2019	Review Stipulation	0.5
8/6/2019	Call with Adrian Bacon, Tom Wheeler, and Steven Soliman re: Deposition Scheduling	1
8/20/2019	Email to Bumble re: Deposition Scheduling	0.4
8/21/2019	Call with Adrian Bacon, Tom Wheeler, and Todd Friedman re: Status of Matter	1
8/30/2019	Call Between Adrian Bacon and Tom Wheeler re: Deposition Topics	1.5
9/9/2019	Email re: Deposition Availability for Bumble and Request For Plaintiff Availability	0.4
9/11/2019	Email to Bumble re: Depositions	0.3
9/11/2019	Emails re: Deposition Scheduling	0.5
9/19/2019	Email to Bumble re: Depositions	0.3
9/19/2019	Email re: Plaintiff Deposition	0.5
9/25/2019	Bumble's Email re: Depositions	0.3
9/30/2019	Email to Bumble re: Depositions	0.3
10/1/2019	Email re: Plaintiff Deposition	0.4
10/3/2019	Call Between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Defendant's Deposition	1.4
10/3/2019	Email to Bumble re: Depositions	0.3
10/3/2019	Call with Adrian Bacon and Tom Wheeler re: Depositions	1
10/15/2019	Call with Tom Wheeler, Adrian Bacon, and Todd Friedman re: PMK Depo	1.2
10/15/2019	Call with Steve Soliman, Tom Wheeler, And Adrian Bacon re: Plaintiff's Deposition	1

**TIME ENTRIES: Adrian R. Bacon, Esq. – Partner**



Date	Task	Hours
10/18/2019	Call with Tom Wheeler, Adrian Bacon, and Steve Soliman re: Plaintiff's Deposition	1.1
10/22/2019	Call with Adrian Bacon and Tom Wheeler re: Deposition	2
10/23/2019	Call with Adrian Bacon and Todd Friedman re: Defendant's PMK	0.8
10/23/2019	Call with Adrian Bacon and Tom Wheeler re: Defendant's PMK	2
10/25/2019	Call with Adrian Bacon and Tom Wheeler before Deposition	0.6
10/25/2019	Call with Adrian Bacon and Tom Wheeler During Deposition	0.5
10/29/2019	Review Tom Wheeler's Notes re: Deposition, Evidence	3.6
10/29/2019	Call with Adrian Bacon and Todd Friedman re: Motion for Class Certification	1.2
10/29/2019	Call with Adrian Bacon and Tom Wheeler re: Motion for Class Certification	1.5
10/30/2019	Begin Drafting Motion for Class Certification, Legal Research	6.2
10/31/2019	Continue Drafting Motion for Class Certification, Review Evidence	5
10/31/2019	Call with Adrian Bacon and Tom Wheeler re: Motion for Class Certification	0.8
11/4/2019	Receive and Review Email From Defendant re: Scheduling	0.4
11/4/2019	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Extension, Case Posture, And Settlement Options	1.4
11/4/2019	Email to Bumble re: Extension Proposal	0.6
11/4/2019	Call with Adrian Bacon and Tom Wheeler Re: Motion for Class Certification	1.2
11/4/2019	Continue Drafting Motion for Class Certification, Exhibits	5.8
11/5/2019	Call with Tom Wheeler and Adrian Bacon re: Motion for Class Certification	1.2
11/5/2019	Revise Motion for Class Certification, Legal Research	4
11/7/2019	Receive Transcript of Defendant's PMK, Review, Cite, Revise Motion	6.1
11/7/2019	Call between Adrian Bacon and Tom Wheeler re: Transcript, Motion	1.4
11/8/2019	Call between Adrian Bacon and Steve Soliman re: Depo Transcript	1
11/11/2019	Receive Mansour's Transcript, Review and Cite	4.5
11/8/2019	Finish First Draft of Motion for Class Certification, Legal Research, Circulate	6.2
11/12/2019	Call Between Adrian Bacon and Todd Friedman re: Motion for Class Certification	1
11/14/2019	Call Between Adrian Bacon and Steven Soliman re: Motion for Class Certification	1
11/15/2019	Call with Adrian Bacon and Tom Wheeler re: Motion for Class Certification	1.4
11/18/2019	Review Revised Motion for Class Certification, Update Arguments and Organization, Legal Research	5.1
11/18/2019	Call with Adrian Bacon and Tom Wheeler re: Motion for Class Certification	1.2
11/20/2019	Call with Todd Friedman and Adrian Bacon re: Motion for Class Certification	1.4
11/20/2019	Finish Revisions to Motion for Class Certification, Send to Tom Wheeler For Review	2.2
11/22/2019	Call with Todd Friedman, Adrian Bacon, and Tom Wheeler re: Motion for Class Certification	0.5
11/22/2019	Email to Defendant re: Confidentiality Designations	0.5
11/22/2019	Call between Adrian Bacon and Tom Wheeler re: Sealed Document Issues	0.8
11/22/2019	Receive and Review Email From Defendant re: Sealed Documents	0.2
11/22/2019	Receive and Review Confidentiality Designations By Defendant	0.8

**TIME ENTRIES: Adrian R. Bacon, Esq. – Partner**

Date	Task	Hours
11/25/2019	Final Review of Motion for Class Certification	4
11/25/2019	Call with Adrian Bacon and Tom Wheeler re: Motion for Class Certification	0.5
11/25/2019	Email Motion to Defendant	0.5
11/26/2019	Call with Todd Friedman, Adrian Bacon, Tom Wheeler, and Steve Soliman re: Next Steps	0.5
12/2/2019	Receive and Review Defendant's Proposed Joint Status Report	0.5
12/3/2019	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Scheduling	0.6
12/3/2019	Email to Defendant with proposed scheduling	0.4
12/5/2019	Call with Adrian Bacon and Tom Wheeler re: Scheduling	0.4
12/13/2019	Call with Todd Friedman, Adrian Bacon, Tom Wheeler, and Steve Soliman re: Next Steps After Holidays	1.5
1/17/2021	Call with Todd Friedman, Adrian Bacon, Tom Wheeler, and Steve Soliman re: Next Steps, Settlement	1
1/17/2021	Call with Tom Wheeler and Adrian Bacon re: MSJ	1.2
2/7/2021	Call with Todd Friedman, Adrian Bacon, Tom Wheeler, and Steve Soliman re: Next Steps, Settlement	1
2/17/2020	Begin Reviewing Bumble's MSJ, Notes to File	4.5
2/18/2021	Continue Reviewing Bumble's MSJ, Outline	3.8
2/18/2020	Call with Adrian Bacon and Tom Wheeler re: Motion for Summary Judgment, Discovery	1.2
2/20/2020	Email with Counsel re: Call	0.8
2/20/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: Mediators and Mediation	1
2/20/2020	Email with Mediators re: Availability	0.5
2/21/2020	Continue Reviewing Bumble's MSJ, Legal Research, Outline	6.1
2/24/2020	Call with Adrian Bacon and Steve Soliman re: MSJ	1
2/24/2020	Review Expert Reports, Legal Research	5.1
2/25/2020	Call with Adrian Bacon and Tom Wheeler re: MSJ, Discovery	1.8
2/25/2020	Revise outline and notes on MSJ	1.2
2/25/2020	Email to Defendant re: Mediator Availability	0.6
2/25/2020	Review Defendant's Emails re: Mediators	0.3
2/26/2020	Further Legal Research on MSJ	3.1
3/2/2020	Call with Adrian Bacon and Tom Wheeler re: Status of MSJ, Discovery	1.4
3/3/2020	Call with Adrian Bacon and Tom Wheeler re: Discovery	1
3/3/2020	Review, Revise, Written Discovery Draft	1.8
3/15/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: MSJ, Mediation, Discovery	1.2
3/25/2020	Legal Research on MSJ, Expert Issue	4.2
3/27/2020	Consolidate and Summarize Legal Research for Now, Pending Mediation	3.8
3/27/2020	Call between Tom Wheeler and Adrian Bacon re: MSJ	1.4
4/1/2020	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Motion for Summary Judgment, Mediation, and Discovery	2

**TIME ENTRIES: Adrian R. Bacon, Esq. – Partner**

Date	Task	Hours
4/1/2020	Email to Defendant re: MSJ and Scheduling	0.9
4/10/2020	Follow-up Email re: Scheduling	0.3
4/10/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: MSJ, Mediation, Discovery	1
4/20/2020	Follow-up Email re: Scheduling	0.3
4/20/2020	Call between Adrian Bacon and Tom Wheeler re: Scheduling	1
4/20/2020	Email re: Scheduling	0.3
4/28/2020	Follow-up Email re: Scheduling	0.3
4/30/2020	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Scheduling, Mediation	1.4
5/11/2020	Emails re: Mediation Call	0.4
5/12/2020	Call between Adrian Bacon and Tom Wheeler re: Mediation Call	0.5
5/12/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: Mediation Call	1.2
5/28/2020	Receive and Review Email re: Mediators from Defendant	0.3
5/28/2020	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Mediators	0.6
5/29/2020	Email re: Mediator Choice	0.3
6/2/2020	Legal Research for Mediation Brief, Review Class Certification Motion	5.2
6/3/2020	Review Notes for MSJ, Update for Mediation, Draft Mediation Brief	4.6
6/3/2020	Call with Tom Wheeler and Adrian Bacon re: Legal Research	1
6/11/2020	Receive and Review Email from Judge Andler re: Mediation	0.4
6/11/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation Posture	1.5
6/11/2020	Email to Judge Andler re: Availability	0.4
6/12/2020	Pre-Mediation Call with Adrian Bacon and Tom Wheeler with Judge Andler	0.6
6/12/2020	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Info Needed For Mediation	1.2
6/12/2020	Call between Adrian Bacon and Tom Wheeler re: Pre-Mediation Call	0.6
6/12/2020	Continue Drafting Mediation Brief	3.8
6/16/2020	Continue Drafting Mediation Brief, Legal Research	4.8
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
6/17/2020	Notes to File re: Call	1
6/17/2020	Continue Drafting Mediation Brief, Update With Class Information, Models	3.9
6/18/2020	Call between Adrian Bacon and Todd Friedman re: Mediation Brief	1
6/18/2020	Legal Research, Finish Mediation Brief Draft, Email to Co-Counsel	2.2
6/19/2020	Call between Adrian Bacon and Tom Wheeler re: Mediation Brief	1
6/19/2020	Call between Adrian Bacon and Steve Soliman re: Mediation Brief	1
6/19/2020	Finalize Mediation Brief, Send to Tom Wheeler for filing	1.5
6/19/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation Needs	0.4
6/19/2020	Email to Defendant re: Mediation Discovery	0.5

**TIME ENTRIES: Adrian R. Bacon, Esq. – Partner**

Date	Task	Hours
6/19/2020	Email from Defendant re: Mediation Discovery	0.3
6/19/2020	Call between Adrian Bacon and Tom Wheeler re: Mediation Discovery	0.5
6/22/2020	Legal Research Re: Mediation, Notes to File	3.8
6/22/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation	1.5
6/23/2020	Mediation with Adrian Bacon, Todd Friedman, Steve Soliman, Tom Wheeler, Defendant, and Judge Andler	9.1
6/23/2020	Call with Adrian Bacon, Todd Friedman, and Tom Wheeler re: Mediation Results	1
6/25/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation	0.6
6/25/2020	Legal Research re: MSJ Issues	2.8
6/25/2020	Email to Mediator	0.5
6/25/2020	Call between Adrian Bacon and Todd Friedman re: Mediation	0.4
6/29/2020	Email to Mediator	0.4
6/29/2020	Call between Adrian Bacon and Todd Friedman 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
6/30/2020	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Counter Proposal	1.2
7/1/2020	Emails re: Scheduling Call	0.5
7/2/2020	Call with Adrian Bacon, Todd Friedman, and Tom Wheeler with Defendant re: Counter	0.8
7/2/2020	Call with Adrian Bacon, Todd Friedman, and Tom Wheeler re: Call	0.4
7/2/2020	Notes to File re: Call	1
7/9/2020	Call with Adrian Bacon, Tom Wheeler, and Defendant re: Settlement	0.8
7/9/2020	Call between Adrian Bacon and Tom Wheeler to prepare for call	1
7/9/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Settlement Call	1
7/9/2020	Notes to File re: Calls	0.8
7/15/2020	Call with Todd Friedman and Adrian Bacon re: King v. Bumble	1
7/15/2020	Review King v. Bumble Order Granting Preliminary Approval, Settlement Documents	6.2
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 re: King	0.7
7/16/2020	Call between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Draft Notice Documents	1
7/17/2020	Review Notice Documents Draft	1.4
7/20/2020	Draft Stipulation re: King	2.1
7/20/2020	Call with Todd Friedman and Adrian Bacon re: King Stipulation	1

**TIME ENTRIES: Adrian R. Bacon, Esq. – Partner**

Date	Task	Hours
7/20/2020	Emails with Defendant re: Stipulation	0.5
7/21/2020	Legal Research on other states Unruh Acts	5.8
7/22/2020	Finish Initial Research on Other States Unruh Acts, Notes To File	6
7/22/2020	Call with Adrian Bacon and Todd Friedman re: Settlement Scope	1.5
7/29/2020	Emails with Defendant re: Stipulation	0.6
7/29/2020	Review Revisions to Stipulation, Further Edits	1.2
7/29/2020	Call with Adrian Bacon and Todd Friedman re: Stipulation	0.8
7/31/2020	Call with Adrian Bacon and Tom Wheeler re: Other States	1.4
8/7/2020	Receive final revisions to stipulation, accept, execute	1.2
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
8/20/2020	Call Between Adrian Bacon and Todd Friedman re: Settlement	1
8/21/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Status of Matter	0.8
8/31/2020	Call with Defendant re: Settlement	0.8
8/31/2020	Notes to File re: Call	0.6
8/31/2020	Call between Tom Wheeler and Adrian Bacon re: Settlement	1
8/31/2020	Call between Todd Friedman and Adrian Bacon re: Settlement	1.6
9/1/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Settlement, Next Steps	0.8
9/1/2020	Call between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Settlement Agreement	1
9/3/2020	Call with Tom Wheeler and Adrian Bacon re: Settlement Language	1.4
9/3/2020	Legal Research for Fee Demand, Notes	3.8
9/3/2020	Call Between Adrian Bacon and Todd Friedman re: Fee Demand	1
9/4/2020	Review Hours, Legal Research For Fee Demand	4.4
9/4/2020	Call between Tom Wheeler and Adrian Bacon re: Settlement Agreement Language	1.4
9/9/2020	Review, Revise, Finalize Settlement Agreement, Send to Defendant	3.8
9/9/2020	Call Between Todd Friedman, Adrian Bacon, and Steve Soliman re: Fee Demand	1.2
9/9/2020	Legal Research, Draft and Send Email re: Fee Demand	4.2
9/15/2020	Email with Simpluris re: Administrator Bids	0.8
9/15/2020	Email with PNC re: Administrator Bids	0.8
9/15/2020	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Administration	1
9/17/2020	Email with Judge Andler re: Scheduling	0.4
9/17/2020	Receive and Review Defendant's Response to Demand	0.3
9/17/2020	Call Between Todd Friedman, Adrian Bacon, and Steve Soliman re: Fee Demand	1
9/18/2020	Review Revised Settlement Agreement	1.2
9/18/2020	Call between Tom Wheeler and Adrian Bacon re: Settlement Revisions	1

**TIME ENTRIES: Adrian R. Bacon, Esq. – Partner**

Date	Task	Hours
9/18/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Revisions to Settlement Agreement and Fees	1.3
9/18/2020	Email to Defendant re: Timing on Revisions	0.3
9/18/2020	Email re: Fees to Defendant	0.3
9/18/2020	Call between Adrian Bacon and Tom Wheeler re: Simpluris	0.5
9/23/2020	Emails re: Stipulation to Withdraw Motions	0.4
9/25/2020	Call Between Todd Friedman, Adrian Bacon, and Tom Wheeler re: Revisions to Settlement Agreement	1.2
10/5/2020	Email re: Second Mediation	0.5
10/6/2020	Emails re: Scheduling Call re Mediation	0.5
10/6/2020	Legal Research, Begin Drafting Initial Brief	4.6
10/6/2020	Call between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Call	0.8
10/7/2020	Call between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Call	1.4
10/7/2020	Finish Mediation Fee Brief, Distribute for Review and Questions	3.2
10/8/2020	Call with Adrian Bacon and Todd Friedman re: Mediation Brief	0.8
10/8/2020	Email to Defendant re: Status Conference Date	0.3
10/8/2020	Email with Simpluris re: Updated Bid	0.5
10/9/2020	Call between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Mediation Brief	0.6
10/12/2020	Call between Adrian Bacon and Tom Wheeler re: Simpluris	0.4
10/15/2020	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Mediation	0.8
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
10/20/2020	Call Between Adrian Bacon and Tom Wheeler re: Administration Quotes	0.5
10/20/2020	Email to Defendant re: Agreement	0.3
10/23/2020	Email to Defendant re: Agreement	0.3
10/23/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Settlement Agreement and Status	0.6
10/28/2020	Receive and Review Changes to Settlement Agreement	0.4
10/28/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Revised Settlement Agreement and Staffing	2
10/28/2020	Emails with PNC re: Administration	0.8
10/28/2020	Email re: Scheduling Kick-Off Call with PNC	0.4
10/29/2020	Email to Defendant re: Revisions	0.4
11/2/2020	Email with PNC re: Exhibits	0.5
11/2/2020	Follow-up Email re: Revisions to Defendant	0.2
11/2/2020	Call with Adrian Bacon and Tom Wheeler re: Call Revisions	0.5
11/4/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Preliminary Approval Motion	1
11/5/2020	Receive and Review Revisions to Status Conference Statement	0.6
11/5/2020	Call to Discuss Status Conference Statement	0.3

**TIME ENTRIES: Adrian R. Bacon, Esq. – Partner**

Date	Task	Hours
11/5/2020	Email to Defendant re: Status Conference Statement	0.4
11/6/2020	Email to Defendant re: Administration Questions	0.6
11/6/2020	Call with Adrian Bacon, Tom Wheeler, Todd Friedman, and PNC re: Settlement Administration Kickoff	1
11/6/2020	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Settlement Administration and Next Steps	0.6
11/9/2020	Call between Adrian Bacon and Tom Wheeler re: Confirmatory Discovery	0.8
11/9/2020	Receive and Review Settlement Agreement Revisions from Defendant	0.4
11/9/2020	Call between Adrian Bacon and Tom Wheeler re: Revisions	0.4
11/9/2020	Email to Defendant re: Confirmatory Discovery	0.5
11/10/2020	Call between Todd Friedman, Tom Wheeler, and Adrian Bacon re: Outstanding Issues	0.5
11/11/2020	Email with PNC re: Status of Case	0.4
11/11/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Preliminary Approval Motion	0.5
11/11/2020	Review Motion for Preliminary Approval, Further Revisions	2.6
11/12/2020	Call between Todd Friedman, Tom Wheeler, and Adrian Bacon re: Settlement Revisions	1.2
11/12/2020	Email to Defendant re: scheduling and deadlines	0.5
11/12/2020	Review Revised Settlement Documents Ahead of Call	0.5
11/13/2020	Defendant's email re: notice	0.5
11/13/2020	Call between Tom Wheeler and Adrian Bacon re: Last Settlement Revisions	1
11/18/2020	Call Between Adrian Bacon and Steve Soliman re: Signed Agreement	1
11/18/2020	Call Between Adrian Bacon and Todd Friedman re: Signed Agreement	0.8
11/19/2020	Emails with Defendant re: Confirmatory Discovery and Agreement	0.5
11/23/2020	Call between Todd Friedman, Tom Wheeler, and Adrian Bacon re: Outstanding Issues	0.4
11/23/2020	Call between Todd Friedman, Tom Wheeler, and Adrian Bacon re: Motion for Preliminary Approval	1
11/23/2020	Review Revised Motion for Preliminary Approval	1.2
11/30/2020	Call with Adrian Bacon and Tom Wheeler re: Motion for Preliminary Approval	1
11/30/2020	Call with Tom Wheeler and Steve Soliman re: Preliminary Approval	1
12/2/2020	Emails with Defendant re: Confirmatory Discovery	0.3
12/4/2020	Review Defendant's Revisions to Motion	1.1
12/7/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Preliminary Approval Motion	1.2
12/7/2020	Emails with Defendant re: Confirmatory Discovery	0.5
12/7/2020	Call Between Adrian Bacon and Tom Wheeler re: Confirmatory Discovery	0.8
12/10/2020	Call Between Adrian Bacon and Tom Wheeler re: Confirmatory Discovery	0.5
12/15/2020	Emails re: Confirmatory Discovery	0.8
12/18/2020	Emails with PNC re: Administration	0.3
12/24/2020	Emails with Defendant re: Rescheduling	0.5

**TIME ENTRIES: Adrian R. Bacon, Esq. – Partner**

Date	Task	Hours
12/24/2020	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Deposition	0.6
1/4/2021	Call with Adrian Bacon and Tom Wheeler re: Confirmatory Discovery Deposition	1.2
1/5/2021	Call between Adrian Bacon and Tom Wheeler re: Defendant's PMK Deposition	1.4
1/6/2021	Call between Adrian Bacon and Tom Wheeler re: Defendant's PMK Deposition	0.8
1/6/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Defendant's PMK Deposition, Next Steps	1.4
1/14/2021	Receive and review Court's tentative ruling and CMO	0.7
1/14/2021	Emails with Defendant re: Call	0.4
1/14/2021	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Revised Preliminary Approval Order, Staffing	2
1/15/2021	Call with Adrian Bacon and Todd Friedman re: Changes	0.8
1/20/2021	Review Revised Preliminary Approval Motion, Revise	3
1/22/2021	Call with PNN re: Declaration re Class Certification	1
1/22/2021	Review and Approve PNN's Declaration re: Class Certification	1.8
1/22/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Revised Preliminary Approval Motion	1.4
1/26/2021	Emails with Defendant re: Status of Declarations	0.6
1/28/2021	Emails with Defendant re: Revisions	0.7
1/28/2021	Call between Adrian Bacon and Tom Wheeler re: Finalizing Revised Motion	1.5
2/1/2021	Email with Defendant re: Website Name	0.3
3/4/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Status of Matter	1
3/5/2021	Receive and review Court's tentative ruling	1
3/5/2021	Email Tentative Ruling to PNC	0.3
3/6/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Tentative Ruling	1
3/6/2021	Call with Tom Wheeler and Adrian Bacon with Defendant re: Tentative Ruling	0.7
3/7/2021	Prepare for Hearing on Motion For Preliminary Approval	4.1
3/7/2021	Call Between Adrian Bacon and Tom Wheeler re: Motion for Preliminary Approval	1.3
3/8/2021	Prepare for Hearing on Motion	1.5
3/8/2021	Hearing on Motion for Preliminary Approval	0.7
3/8/2021	Note to file and email re: hearing	2.2
3/8/2021	Call Between Adrian Bacon and Todd Friedman re: hearing	1.5
3/8/2021	Call Between Adrian Bacon and Tom Wheeler re: hearing	1
3/8/2021	Email to Defendant re: Pro Rata Proposal	1.2
3/12/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: revisions	1

**TIME ENTRIES: Adrian R. Bacon, Esq. – Partner**



Date	Task	Hours
3/17/2021	Call between Tom Wheeler and Adrian Bacon re: Settlement Agreement Language	1
3/17/2021	Email Settlement Agreement Revisions to Defendant	0.8
3/17/2021	Email to Defendant re: Documents	0.3
3/24/2021	Email to Defendant re: Documents	0.4
3/30/2021	Emails with PNC re: Administration Costs	0.6
3/30/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Status of Matter	1.2
4/1/2021	Emails with PNC re: Administration Costs	0.3
4/2/2021	Email with JND re: Administrator Bid	0.7
4/9/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: JND Bid	0.5
4/12/2021	Email Defendant re: JND Bid	0.3
4/21/2021	Emails re: Settlement Administration Bids	0.5
4/28/2021	Review Defendant's revised notice language	0.3
4/28/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Notice Language	0.8
4/29/2021	Email to Defendant re: revisions and status	0.5
5/3/2021	Call Between Adrian Bacon and Tom Wheeler re: Settlement Language	0.6
5/6/2021	Emails with PNN re: Declaration and Administration	1.3
5/7/2021	Emails with PNN re: Administration	0.4
5/7/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Status	1
5/7/2021	Review and Revise Preliminary Approval Documents	4.8
5/7/2021	Call Between Tom Wheeler and Adrian Bacon re: Preliminary Approval Documents	1
5/8/2021	Call Between Tom Wheeler and Adrian Bacon re: Preliminary Approval Documents	0.8
5/10/2021	Emails with PNN re: Declaration Status	0.5
5/10/2021	Emails with Defendant re: finalizing motion	0.5
5/10/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Status	1
5/17/2021	Review Tentative Ruling	0.4
5/17/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Tentative Ruling, Next Steps	1.2
5/17/2021	Email with Defendant re: submission on tentative	0.5
5/17/2021	Email with PNN re: Order	0.6
5/18/2021	Emails with PNN re: Notice	0.5
5/21/2021	Email to PNN with Documents	0.6
6/2/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Status	0.5
6/2/2021	Emails with PNN re: Documents	0.6
6/16/2021	Emails re: Status of Signed Order	0.5
6/16/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Status	0.4

**TIME ENTRIES: Adrian R. Bacon, Esq. – Partner**

Date	Task	Hours
6/22/2021	Email to Court re: Status of Signed Order	0.4
6/22/2021	Emails re: Updated Proposed Order	0.3
6/22/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Status	1
6/28/2021	Emails re: Data Privacy Issue	0.4
6/28/2021	Call Between Tom Wheeler and Adrian Bacon re: Data Privacy Issue	0.5
7/1/2021	Receive and Respond to Court Email re: Hearing Date	0.5
7/1/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Status	1
7/9/2021	Emails re: Claims Administration Deadlines	0.7
7/19/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Notice and Fee Motion	1.5
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
8/6/2021	Legal Research for Fees and Final Approval, Notes To File	3.8
8/9/2021	Call Between Adrian Bacon and Todd Friedman re: Class Member Responses	1.2
8/9/2021	Call Between Adrian Bacon and Tom Wheeler re: Class Member Response and Motions	1.1
8/10/2021	More Legal Research for Fees and Final Approval, Notes to File	4.8
8/16/2021	Call With Adrian Bacon and Todd Friedman re: Final Approval Motion, Class Member Responses	1.2
8/18/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Response Rate	1
8/18/2021	Emails with PNN re: Claims Administration Response	0.6
8/19/2021	Emails with PNN re: Objections	0.7
8/19/2021	Review Objections, Notes to File	2.2
8/19/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Objections and Drafting of Final Approval and Fee Motions	1.5
8/20/2021	Emails with PNN re: Claims Administrator Declaration	0.8
8/23/2021	Emails with Defendant and PNN re: Class Notice Rates	1
8/23/2021	Call with Tom Wheeler, Adrian Bacon, and Todd Friedman re: Final Approval and Fee Motion Status	0.8
8/24/2021	Review Steve Soliman's Declaration	0.6
8/24/2021	Call with Steve Soliman and Adrian Bacon re: Declaration	0.8
8/25/2021	Review Motion for Fees, Review Hours and Draft Hours Report	3.8
8/25/2021	Call Between Todd Friedman and Adrian Bacon re: Motions	1
8/26/2021	Emails with PNN re: New Claims Update and Objections	0.7
8/26/2021	Receive and Review Updated Objections and Claims Information	1
8/26/2021	Call Between Tom Wheeler and Adrian Bacon re: Objections	0.8
8/26/2021	Emails with Defendant and PNN re: Email Bounceback	0.8
8/27/2021	Review Motion for Final Approval, Legal Research	3.9

**TIME ENTRIES: Adrian R. Bacon, Esq. – Partner**

Date	Task	Hours
8/27/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Motions, Deadlines	1
8/30/2021	Call Between Todd Friedman and Adrian Bacon re: Class Member Responses	1.2
8/30/2021	Call Between Tom Wheeler and Adrian Bacon re: Claims, Motions	1
9/1/2021	Call Between Todd Friedman, Adrian Bacon, Tom Wheeler, Steven Soliman re: Motions and Deadlines	0.8
9/1/2021	Review and Revise Motion for Final Approval and Motion for Fees, Legal Research	5.2
9/1/2021	Call between Todd Friedman and Adrian Bacon re: Motion for Final Approval and Fees	0.8
9/2/2021	Call between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Motions, Deadlines, Claims, Administration	2
9/3/2021	Call between Tom Wheeler and Adrian Bacon re: Revisions	1
9/6/2021	Call between Adrian Bacon and Tom Wheeler re: Motions for Final Approval and Fees	1.2
9/7/2021	Call between Adrian Bacon and Tom Wheeler re: New Notice Language	0.6
9/7/2021	Review Proposed Email Language	0.3
9/7/2021	Emails re: Proposed Email Language	0.3
9/7/2021	Call between Todd Friedman, Tom Wheeler, and Adrian Bacon re: New Notice	1
9/7/2021	Emails with PNC re: Notice Issue	0.5
9/8/2021	Call between Adrian Bacon and Tom Wheeler re: New Notice	0.5
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 Adrian Bacon re: Final Approval Motion	0.8
9/9/2021	Review, Revise Motion for Final Approval and Motion For Fees, Legal Research, Final Approval	5.2

**TOTAL TIME – 580.6**  
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**TIME ENTRIES: Adrian R. Bacon, Esq. – Partner**

**Mansour, Kirilose v. Bumble Trading, Inc.****TIME ENTRIES: Tom E. Wheeler, Esq. – Senior Associate**

Date	Task	Hours
10/4/2018	Call between Tom Wheeler and Adrian Bacon re: Proposed Inunctive Relief Structure	0.6
10/4/2018	Emails between Adrian Bacon and Tom Wheeler re: Proposed Injunctive Relief	0.5
11/5/2018	Reivew Joint Status Report	0.5
11/12/2018	Call with Adrian Bacon and Tom Wheeler re: Case and CMC	2
11/12/2018	Review File and Prepare for CMC	2.4
11/13/2018	Travel to and from and attend Continued Status Conference	5.1
11/13/2018	Meet and Confer with Defendant re: Discovery and Settlement Discussions	0.8
11/13/2018	Call with Todd Friedman, Tom Wheeler, and Adrian Bacon re: Status Conference	1
11/13/2018	Notes to file from CMC	0.5
12/13/2018	Receive Defendant's Informal Discovery Requests	0.5
1/17/2019	Emails to Defendant re: Informal Discovery	0.6
12/10/2018	Review Protective Order	0.5
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
1/18/2019	Call with Tom Wheeler and Adrian Bacon re: Informal Discovery Requests	1.2
1/18/2019	Notes to File Re: Discovery	0.5
1/18/2019	Email to Defendant re: Discovery Requests	0.5
1/25/2019	Draft Declaration re OSC, File	1.8
2/6/2019	Call with Adrian Bacon and Tom Wheeler re: Status of Informal Discovery	1
2/13/2019	Draft and Circulate Joint Status Report	1.1
2/13/2019	Call with Adrian Bacon and Tom Wheeler re: Scheduling	0.5
2/27/2019	Review Defendant's Informal Discovery Responses	2.2
2/27/2019	Call with Adrian Bacon and Tom Wheeler re: Discovery Responses, Discovery Needs	0.8
3/1/2019	Call with Adrian Bacon, Tom Wheeler, and Steven Soliman re: Status Conference & Scheduling	1
3/1/2019	Prepare for Status Conference, Review Declaration, Status	3.8
3/4/2019	Travel to and from and attend Continued Status Conference	4.9
3/4/2019	Call with Adrian Bacon, Tom Wheeler, and Todd Friedman re: OSC and Status Conference	1.2
3/4/2019	Notes to file, UPDATE CALENDARING!	0.8
3/8/2019	Review Further Discovery Responses	1.4
3/8/2019	Call with Adrian Bacon and Tom Wheeler re: Outstanding Discovery, Deposition	1.2
3/8/2019	Draft Initial Deposition Topics	2.2
3/15/2019	Email to Defendant re: PMK Depo	0.3

**TIME ENTRIES: Tom E. Wheeler, Esq. – Senior Associate**

Date	Task	Hours
5/21/2019	Call with Adrian Bacon and Tom Wheeler re: Deposition Topics	1.2
5/21/2019	Emails to Defendant re: Deposition Topics	0.6
5/28/2019	Call with Tom Wheeler and Steven Soliman re: Status of Matter, Deposition Dates	1
5/29/2019	Email with Defendant re: Deposition Scheduling	0.3
5/31/2019	Emails with Defendant re: rescheduling Plaintiff's Deposition	0.3
5/31/2019	Call with Steven Soliman and Tom Wheeler re: Plaintiff's Deposition	0.5
6/4/2019	Call With Tom Wheeler, Adrian Bacon, and Todd Friedman re: Status of Matter, Deposition	0.5
6/4/2019	Call with Tom Wheeler and Adrian Bacon re: Deposition Scheduling	0.8
6/4/2019	Draft and Send Deposition Notice, Schedule Court Reporter	2.5
6/12/2019	Call with Tom Wheeler and Adrian Bacon re: Scheduling	0.5
6/12/2019	Email to Defendant re: Rescheduling and Stipulation to Extend	0.6
6/13/2019	Review Stipulation	0.5
6/19/2019	Prepare Revised Deposition Notice, Schedule Court Reporter	1.2
6/26/2019	Call with Tom Wheeler and Adrian Bacon re: Deposition Scheduling Issues	1.5
6/27/2019	Prepare Revised Deposition Notice, Schedule Court Reporter	1
7/11/2019	Emails re: Rescheduling Deposition Again	0.6
7/11/2019	Call with Tom Wheeler and Adrian Bacon re: Deposition Scheduling Issues	0.8
7/16/2019	Prepare Revised Deposition Notice, Schedule Court Reporter	1
8/2/2019	Emails re: Deposition Dates Being Moved	0.4
8/6/2019	Review, Revise, and Sign Stipulation To Extend Class Certification to Defendant	1
8/6/2019	Call with Adrian Bacon, Tom Wheeler, and Steven Soliman re: Deposition Scheduling	1
8/20/2019	Email to Bumble re: Deposition Scheduling	0.4
8/21/2019	Call with Adrian Bacon, Tom Wheeler, and Todd Friedman re: Status of Matter	1
8/30/2019	Call Between Adrian Bacon and Tom Wheeler re: Deposition Topics	1.5
9/9/2019	Email re: Deposition Availability for Bumble and Request For Plaintiff Availability	0.4
9/9/2019	Call Between Tom Wheeler and Steve Soliman re: Mansour Availability	0.5
9/11/2019	Email to Bumble re: Depositions	0.3
9/11/2019	Emails re: Deposition Scheduling	0.5
9/11/2019	Call with Tom Wheeler and Steve Soliman Re: Depositions	0.8
9/19/2019	Email to Bumble re: Depositions	0.3
9/19/2019	Email re: Plaintiff Deposition	0.5
9/25/2019	Bumble's Email re: Depositions	0.3
9/30/2019	Email to Bumble re: Depositions	0.3
10/1/2019	Email re: Plaintiff Deposition	0.4
10/3/2019	Call Between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Defendant's Deposition	1.4
10/3/2019	Email to Bumble re: Depositions	0.3

**TIME ENTRIES: Tom E. Wheeler, Esq. – Senior Associate**

Date	Task	Hours
10/3/2019	Emails to Confirm Deposition Dates, Prepare Revised Deposition Notice, Schedule Court Reporter, Update Calendaring	1.8
10/3/2019	Call with Adrian Bacon and Tom Wheeler re: Depositions	1
10/15/2019	Call with Tom Wheeler, Adrian Bacon, and Todd Friedman re: PMK Depo	1.2
10/15/2019	Call with Steve Soliman, Tom Wheeler, And Adrian Bacon re: Plaintiff's Deposition	1
10/18/2019	Call with Tom Wheeler, Adrian Bacon, and Steve Soliman re: Plaintiff's Deposition	1.1
10/18/2019	Notes to File re: Call	0.5
10/22/2019	Call with Adrian Bacon and Tom Wheeler re: Deposition	2
10/22/2019	Begin Preparing for Deposition of Defendant's PMK	5.2
10/23/2019	Call with Tom Wheeler and Todd Friedman re: Defendant's PMK	1.2
10/23/2019	Call with Adrian Bacon and Tom Wheeler re: Defendant's PMK	2
10/23/2019	Continue Preparing for Deposition of Defendant's PMK	3
10/24/2019	Finish preparation prior to travel	2
10/24/2019	Travel to Austin for Deposition	6.5
10/25/2019	Review notes in preparation for PMK Deposition, Print Exhibits	2.2
10/25/2019	Call with Adrian Bacon and Tom Wheeler before Deposition	0.6
10/25/2019	Deposition of Defendant's PMK	3.2
10/25/2019	Return Travel from Austin	7.1
10/25/2019	Call with Adrian Bacon and Tom Wheeler During Deposition	0.5
10/25/2019	Call with Adrian Bacon, Tom Wheeler, and Todd Friedman After Deposition	1
10/28/2019	Notes to File re: Deposition, Excerpts, Motion for Class Certification	4.8
10/29/2019	Call with Adrian Bacon and Tom Wheeler re: Motion for Class Certification	1.5
10/31/2019	Call with Adrian Bacon and Tom Wheeler re: Motion for Class Certification	0.8
11/4/2019	Receive and Review Email From Defendant re: Scheduling	0.4
11/4/2019	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Extension, Case Posture, And Settlement Options	1.4
11/4/2019	Email to Bumble re: Extension Proposal	0.6
11/4/2019	Call with Adrian Bacon and Tom Wheeler Re: Motion for Class Certification	1.2
11/5/2019	Call with Tom Wheeler and Adrian Bacon re: Motion for Class Certification	1.2
11/5/2019	Review Current Draft of Motion for Class Certification, Comments	3.2
11/7/2019	Review Transcript of Defendant's PMK, Update Notes, Cites	3.8
11/7/2019	Call between Adrian Bacon and Tom Wheeler re: Transcript, Motion	1.4
11/6/2019	Receive, Review, Approve, and Execute Stipulation for Extension, Email to Defendant	1
11/15/2019	Review Motion for Class Certification and Revisions, Consolidate and Revise, Update Exhibits	6.8
11/15/2019	Call with Adrian Bacon and Tom Wheeler re: Motion for Class Certification	1.4
11/18/2019	Call with Adrian Bacon and Tom Wheeler re: Motion for Class Certification	1.2
11/22/2019	Review Motion for Class Certification, Format and Prepare For Filing	7
11/22/2019	Call with Todd Friedman, Adrian Bacon, and Tom Wheeler re: Motion for Class Certification	0.5

**TIME ENTRIES: Tom E. Wheeler, Esq. – Senior Associate**

Date	Task	Hours
11/22/2019	Draft Motion to Seal, Legal Research	3.2
11/22/2019	Email to Defendant re: Confidentiality Designations	0.5
11/22/2019	Call between Adrian Bacon and Tom Wheeler re: Sealed Document Issues	0.8
11/22/2019	Receive and Review Email From Defendant re: Sealed Documents	0.2
11/22/2019	Receive and Review Confidentiality Designations By Defendant	0.8
11/22/2019	Update Transcript, Highlight, Draft Email, and Send to Defendant re: Confidentiality Procedures	1.6
11/22/2019	Call between Adrian Bacon and Tom Wheeler re: Confidentiality Designations	0.8
11/25/2019	Call with Adrian Bacon and Tom Wheeler re: Motion for Class Certification	0.5
11/25/2019	Finalize and File Motion for Class Certification and Exhibits	4
11/25/2019	Email Motion to Defendant	0.5
11/26/2019	Call with Todd Friedman, Adrian Bacon, Tom Wheeler, and Steve Soliman re: Next Steps	0.5
12/2/2019	Receive and Review Defendant's Proposed Joint Status Report	0.5
12/3/2019	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Scheduling	0.6
12/3/2019	Email to Defendant with proposed scheduling	0.4
12/3/2019	Draft Revised Joint Status Report, email to Defendant	0.8
12/5/2019	Review final revised joint status report, approve for filing	0.7
12/5/2019	Call with Adrian Bacon and Tom Wheeler re: Scheduling	0.4
12/6/2019	Review Defendant's Declaration for Sealing	1
12/13/2019	Call with Todd Friedman, Adrian Bacon, Tom Wheeler, and Steve Soliman re: Next Steps After Holidays	1.5
1/17/2021	Call with Todd Friedman, Adrian Bacon, Tom Wheeler, and Steve Soliman re: Next Steps, Settlement	1
1/17/2021	Call with Tom Wheeler and Adrian Bacon re: MSJ	1.2
2/7/2021	Call with Todd Friedman, Adrian Bacon, Tom Wheeler, and Steve Soliman re: Next Steps, Settlement	1
2/18/2020	Review Bumble's MSJ, Expert Reports, Declarations, Notes To File	6.1
2/18/2020	Call with Adrian Bacon and Tom Wheeler re: Motion for Summary Judgment, Discovery	1.2
2/20/2020	Call with Defendant re: Mediators	1
2/20/2020	Notes to file re: Call	0.5
2/20/2020	Email with Counsel re: Call	0.8
2/20/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: Mediators and Mediation	1
2/20/2020	Email with Mediators re: Availability	0.5
2/21/2020	Call between Tom Wheeler and Adrian Bacon re: MSJ	1.4
2/25/2020	Legal Research on Bumble's MSJ, Notes to File	4
2/25/2020	Call with Adrian Bacon and Tom Wheeler re: MSJ, Discovery	1.8
2/25/2020	Email to Defendant re: Mediator Availability	0.6
2/25/2020	Review Defendant's Emails re: Mediators	0.3

**TIME ENTRIES: Tom E. Wheeler, Esq. – Senior Associate**

Date	Task	Hours
3/2/2020	Review Adrian Bacon's Notes, Legal Research	4.1
3/2/2020	Call with Adrian Bacon and Tom Wheeler re: Status of MSJ, Discovery	1.4
3/3/2020	Draft Written Discovery re: Arbitrary Discrimination	3.2
3/3/2020	Call with Adrian Bacon and Tom Wheeler re: Discovery	1
3/5/2020	Email to Defendant re: Mediator Availability	0.4
3/15/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: MSJ, Mediation, Discovery	1.2
3/27/2020	Call between Tom Wheeler and Adrian Bacon re: MSJ	1.4
4/1/2020	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Motion for Summary Judgment, Mediation, and Discovery	2
4/1/2020	Email to Defendant re: MSJ and Scheduling	0.9
4/10/2020	Follow-up Email re: Scheduling	0.3
4/10/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: MSJ, Mediation, Discovery	1
4/20/2020	Follow-up Email re: Scheduling	0.3
4/20/2020	Call between Adrian Bacon and Tom Wheeler re: Scheduling	1
4/20/2020	Email re: Scheduling	0.3
4/28/2020	Follow-up Email re: Scheduling	0.3
4/30/2020	Review Stipulation For Extension, Revise, And Execute and Email	1.2
4/30/2020	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Scheduling, Mediation	1.4
5/11/2020	Emails re: Mediation Call	0.4
5/12/2020	Call between Adrian Bacon and Tom Wheeler re: Mediation Call	0.5
5/12/2020	Call with Defendant re: Mediation	1
5/12/2020	Notes to File	0.8
5/12/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: Mediation Call	1.2
5/28/2020	Receive and Review Email re: Mediators from Defendant	0.3
5/28/2020	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Mediators	0.6
5/29/2020	Email re: Mediator Choice	0.3
6/3/2020	Call with Tom Wheeler and Adrian Bacon re: Legal Research	1
6/3/2020	Legal Research for Mediation Brief, Notes to Adrian	2.6
6/11/2020	Receive and Review Email from Judge Andler re: Mediation	0.4
6/11/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation Posture	1.5
6/11/2020	Email to Judge Andler re: Availability	0.4
6/12/2020	Pre-Mediation Call with Adrian Bacon and Tom Wheeler with Judge Andler	0.6
6/12/2020	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Info Needed For Mediation	1.2
6/12/2020	Call between Adrian Bacon and Tom Wheeler re: Pre-Mediation Call	0.6
6/12/2020	Draft and Send Email re: Discovery Needed to Andler	0.3
6/17/2020	Receive and Review Defendant's Discovery Response	0.5

**TIME ENTRIES: Tom E. Wheeler, Esq. – Senior Associate**



Date	Task	Hours
6/17/2020	Call between Adrian Bacon, Tom Wheeler, Todd Friedman, and Steve Soliman re: Mediation Discovery and Proposals	1.5
6/18/2020	Receive, Review, Revise Mediation Brief, Legal Research	3
6/19/2020	Call between Adrian Bacon and Tom Wheeler re: Mediation Brief	1
6/19/2020	Review final Mediation Brief, email to Mediator	1
6/19/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation Needs	0.4
6/19/2020	Email to Defendant re: Mediation Discovery	0.5
6/19/2020	Email from Defendant re: Mediation Discovery	0.3
6/19/2020	Call between Adrian Bacon and Tom Wheeler re: Mediation Discovery	0.5
6/22/2020	Review and Revise Stipulation To Move Dates, Approve	1.2
6/22/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation	1.5
6/23/2020	Mediation with Adrian Bacon, Todd Friedman, Steve Soliman, Tom Wheeler, Defendant, and Judge Andler	9.1
6/23/2020	Call with Adrian Bacon, Todd Friedman, and Tom Wheeler re: Mediation Results	1
6/25/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Mediation	0.6
6/25/2020	Email to Mediator	0.5
6/29/2020	Email to Mediator	0.4
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
6/30/2020	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Counter Proposal	1.2
7/1/2020	Emails re: Scheduling Call	0.5
7/2/2020	Call with Adrian Bacon, Todd Friedman, and Tom Wheeler with Defendant re: Counter	0.8
7/2/2020	Call with Adrian Bacon, Todd Friedman, and Tom Wheeler re: Call	0.4
7/9/2020	Call with Adrian Bacon, Tom Wheeler, and Defendant re: Settlement	0.8
7/9/2020	Call between Adrian Bacon and Tom Wheeler to prepare for call	1
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 re: King	0.7
7/16/2020	Call between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Draft Notice Documents	1
7/16/2020	Begin Drafting Notice Documents	4.1
7/17/2020	Finish Proposed Notice Documents, Send to Defendant	2
7/20/2020	Emails with Defendant re: Stipulation	0.5

**TIME ENTRIES: Tom E. Wheeler, Esq. – Senior Associate**

Date	Task	Hours
7/29/2020	Emails with Defendant re: Stipulation	0.6
7/31/2020	Call with Adrian Bacon and Tom Wheeler re: Other States	1.4
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
7/29/2020	Review, Revise Stipulation to Extend Dates, Finalize	0.8
8/21/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Status of Matter	0.8
8/31/2020	Call between Tom Wheeler and Adrian Bacon re: Settlement	1
9/1/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Settlement, Next Steps	0.8
9/1/2020	Call between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Settlement Agreement	1
9/1/2020	Begin Drafting Settlement Agreement	5.1
9/3/2020	Continue Drafting Settlement Agreement	3.8
9/3/2020	Call with Tom Wheeler and Adrian Bacon re: Settlement Language	1.4
9/3/2020	Call with Tom Wheeler and Todd Friedman re: Settlement Agreement	0.8
9/4/2020	Finish Drafting Settlement Agreement, Circulate For Review	6.2
9/4/2020	Call between Tom Wheeler and Adrian Bacon re: Settlement Agreement Language	1.4
9/7/2020	Call Between Todd Friedman and Tom Wheeler re: Settlement Agreement	1
9/8/2020	Call between Adrian Bacon and Tom Wheeler re: Settlement Agreement	1.2
9/8/2020	Call Between Steve Soliman and Tom Wheeler re: Settlement Agreement	0.5
9/8/2020	Review and Revise Settlement Agreement, Send to Adrian Bacon for final review	2.5
9/15/2020	Email with Simpluris re: Administrator Bids	0.8
9/15/2020	Email with PNC re: Administrator Bids	0.8
9/15/2020	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Administration	1
9/17/2020	Email with Judge Andler re: Scheduling	0.4
9/17/2020	Receive and Review Defendant's Revisions to Settlement Agreement, Circulate to Counsel	2.2
9/17/2020	Receive and Review Defendant's Response to Demand	0.3
9/18/2020	Call between Tom Wheeler and Adrian Bacon re: Settlement Revisions	1
9/18/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Revisions to Settlement Agreement and Fees	1.3
9/18/2020	Email to Defendant re: Timing on Revisions	0.3
9/18/2020	Email re: Fees to Defendant	0.3
9/18/2020	Call with Simpluris re: Bid	0.6
9/18/2020	Notes to file re: Simpluris Call	0.4
9/18/2020	Call between Adrian Bacon and Tom Wheeler re: Simpluris	0.5
9/23/2020	Call Between Tom Wheeler and Todd Friedman re: Settlement Agreement	1
9/23/2020	Emails re: Stipulation to Withdraw Motions	0.4

**TIME ENTRIES: Tom E. Wheeler, Esq. – Senior Associate**

Date	Task	Hours
9/25/2020	Call Between Todd Friedman, Adrian Bacon, and Tom Wheeler re: Revisions to Settlement Agreement	1.2
9/25/2020	Consolidate Revisions to Settlement Agreement, Circulate	1.4
9/25/2020	Revise Settlement Agreement per call	1
9/28/2020	Receive, Review, Revise, and Finalize Stipulation to Withdraw Motion	1.4
9/28/2020	Finalize and Send Revisions to Settlement Agreement to Defendant	1.2
10/5/2020	Email re: Second Mediation	0.5
10/6/2020	Emails re: Scheduling Call re Mediation	0.5
10/6/2020	Call between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Call	0.8
10/7/2020	Call with Todd Friedman, Tom Wheeler, and Defendant re: Second Mediation	0.8
10/7/2020	Call between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Call	1.4
10/7/2020	Revise and Approve Stipulation to Extend Dates	1
10/7/2020	Notes to File re: Call	0.5
10/8/2020	Email to Defendant re: Status Conference Date	0.3
10/8/2020	Email with Simpluris re: Updated Bid	0.5
10/9/2020	Call between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Mediation Brief	0.6
10/9/2020	Call between Tom Wheeler and Steve Soliman re: Mediation Brief	1
10/9/2020	Legal Research, Review and Revise Mediation Brief, Finalize and Send	5.5
10/12/2020	Call with Simpluris re: Updated Bid	0.6
10/12/2020	Notes to file re: Simpluris Call	0.4
10/12/2020	Call between Adrian Bacon and Tom Wheeler re: Simpluris	0.4
10/15/2020	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Mediation	0.8
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	Revise and Update Settlement Agreement, Send to Defendant	2.2
10/16/2020	Draft and Revise Exhibits to Settlement Agreement, Send to Defendant	3
10/20/2020	Call Between Adrian Bacon and Tom Wheeler re: Administration Quotes	0.5
10/20/2020	Email to Defendant re: Agreement	0.3
10/23/2020	Email to Defendant re: Agreement	0.3
10/23/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Settlement Agreement and Status	0.6
10/28/2020	Receive and Review Changes to Settlement Agreement	1
10/28/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Revised Settlement Agreement and Staffing	2
10/28/2020	Emails with PNC re: Administration	0.8
10/28/2020	Email re: Scheduling Kick-Off Call with PNC	0.4
10/29/2020	Call Between Todd Friedman and Tom Wheeler re: Settlement Revisions	0.9
10/29/2020	Email to Defendant re: Revisions	0.4
11/2/2020	Email with PNC re: Exhibits	0.5
11/2/2020	Follow-up Email re: Revisions to Defendant	0.2

**TIME ENTRIES: Tom E. Wheeler, Esq. – Senior Associate**

Date	Task	Hours
11/2/2020	Call between Todd Friedman and Tom Wheeler re: Call Revisions	0.7
11/2/2020	Call with Tom Wheeler, Todd Friedman, and Defendant re: Proposed Revisions	0.8
11/2/2020	Call with Adrian Bacon and Tom Wheeler re: Call Revisions	0.5
11/3/2020	Draft Stipulation to Amend, Amended Complaint, Circulate to Defendant	6
11/3/2020	Draft Status Report and Send to Defendant	1
11/4/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Preliminary Approval Motion	1
11/5/2020	Receive and Review Revisions to Status Conference Statement	0.6
11/5/2020	Call to Discuss Status Conference Statement	0.3
11/5/2020	Email to Defendant re: Status Conference Statement	0.4
11/6/2020	Email to Defendant re: Administration Questions	0.6
11/6/2020	Call with Adrian Bacon, Tom Wheeler, Todd Friedman, and PNC re: Settlement Administration Kickoff	1
11/6/2020	Notes to File Re: Call	0.5
11/6/2020	Call between Adrian Bacon, Tom Wheeler, and Todd Friedman re: Settlement Administration and Next Steps	0.6
11/9/2020	Call between Adrian Bacon and Tom Wheeler re: Confirmatory Discovery	0.8
11/9/2020	Receive and Review Settlement Agreement Revisions from Defendant	0.6
11/9/2020	Call between Adrian Bacon and Tom Wheeler re: Revisions	0.4
11/9/2020	Email to Defendant re: Confirmatory Discovery	0.5
11/10/2020	Call between Todd Friedman, Tom Wheeler, and Adrian Bacon re: Outstanding Issues	0.5
11/11/2020	Email with PNC re: Status of Case	0.4
11/11/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Preliminary Approval Motion	0.5
11/11/2020	Review Motion for Preliminary Approval Revisions, Revise After Call, Draft Declarations, Send to Steve Soliman	6
11/12/2020	Call between Todd Friedman, Tom Wheeler, and Adrian Bacon re: Settlement Revisions	1.2
11/12/2020	Email to Defendant re: scheduling and deadlines	0.5
11/12/2020	Review and Revise Settlement Documents, Circulate to Adrian Bacon and Todd Friedman	1.9
11/12/2020	Further Revise Settlement Documents After Call	1
11/13/2020	Defendant's email re: notice	0.5
11/13/2020	Call between Tom Wheeler and Adrian Bacon re: Last Settlement Revisions	1
11/13/2020	Finalize and Send to Defendant Revised Settlement Documents	1.5
11/13/2020	Receive Defendant's Response, Finalize Documents	1
11/13/2020	Call between Steven Soliman and Tom Wheeler re: Motion for Preliminary Approval and Settlement Agreement	0.8
11/16/2020	Review and Further Revise Settlement Documents form Defendant	1
11/18/2020	Receive, Review In Full Again, and Send Signed Settlement Agreement to Defendant	2.2

**TIME ENTRIES: Tom E. Wheeler, Esq. – Senior Associate**

Date	Task	Hours
11/19/2020	Emails with Defendant re: Confirmatory Discovery and Agreement	0.5
11/20/2020	Compile and send final copies of Stipulation and Agreement to Defendant	1.2
11/23/2020	File Stipulation To Amend, Update File	1.1
11/23/2020	Call between Todd Friedman, Tom Wheeler, and Adrian Bacon re: Outstanding Issues	0.4
11/23/2020	Call between Todd Friedman, Tom Wheeler, and Adrian Bacon re: Motion for Preliminary Approval	1
11/23/2020	Notes to File From Call	0.8
11/30/2020	Review and Consolidate All Outstanding Revisions To Motion for Preliminary Approval, QC Check	6.1
11/30/2020	Call with Adrian Bacon and Tom Wheeler re: Motion for Preliminary Approval	1
11/30/2020	Call with Todd Friedman re: Motion for Preliminary Approval	0.8
11/30/2020	Call with Tom Wheeler and Steve Soliman re: Preliminary Approval	1
12/1/2020	Finalize revisions to Motion for Preliminary Approval, Send to Defendant	3.6
12/1/2020	Call Between Tom Wheeler and Steve Soliman re: Outstanding Documents	0.8
12/2/2020	Emails with PNC re: Administration	0.3
12/2/2020	Emails with Defendant re: Confirmatory Discovery	0.3
12/4/2020	Receive and Review Defendant's Revisions to Motion for Preliminary Approval	1.5
12/7/2020	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Preliminary Approval Motion	1.2
12/7/2020	Finalize Motion for Preliminary Approval and Email Defendant	2.6
12/7/2020	Emails with Defendant re: Confirmatory Discovery	0.5
12/7/2020	Call Between Adrian Bacon and Tom Wheeler re: Confirmatory Discovery	0.8
12/10/2020	Finalize and File Motion for Preliminary Approval, Email Defendant	3.8
12/10/2020	Call Between Adrian Bacon and Tom Wheeler re: Confirmatory Discovery	0.5
12/10/2020	Draft and Send Deposition Notice	1
12/10/2020	Schedule Deposition with Court Reporter	0.6
12/15/2020	Emails re: Confirmatory Discovery	0.8
12/18/2020	Emails with PNC re: Administration	0.3
12/24/2020	Emails with Defendant re: Rescheduling	0.5
12/24/2020	Revise Deposition Notice, Resend	1
12/24/2020	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Deposition	0.6
12/24/2020	Schedule Deposition with Court Reporter	0.4
1/4/2021	Call with Adrian Bacon and Tom Wheeler re: Confirmatory Discovery Deposition	1.2
1/5/2021	Prepare for Deposition of Defendant's PMK	5.2
1/5/2021	Call between Adrian Bacon and Tom Wheeler re: Defendant's PMK Deposition	1.4
1/6/2021	Receive Court's Order re: First Amended Complaint, File First Amended Complaint, Email Defendant	1.4

**TIME ENTRIES: Tom E. Wheeler, Esq. – Senior Associate**

Date	Task	Hours
1/6/2021	Take Deposition of Defendant's PMK	1.5
1/6/2021	Prepare for Deposition of Defendant's PMK	1.8
1/6/2021	Call between Adrian Bacon and Tom Wheeler re: Defendant's PMK Deposition	0.8
1/6/2021	Notes to File RE: Deposition	1
1/6/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Defendant's PMK Deposition, Next Steps	1.4
1/14/2021	Receive and review Court's tentative ruling and CMO	1
1/14/2021	Emails with Defendant re: Call	0.4
1/14/2021	Call Between Adrian Bacon, Todd Friedman, Steve Soliman, and Tom Wheeler re: Revised Preliminary Approval Order, Staffing	2
1/14/2021	Notes to file re: Call	1
1/15/2021	Review Motion Against CMO, Make List of Changes, Send to Defendant Ahead Of Call	3.2
1/15/2021	Call Between Tom Wheeler and Todd Friedman re: Changes Ahead Of Call	1
1/15/2021	Call With Tom Wheeler, Todd Friedman, and Defendant re: Changes	0.7
1/15/2021	Call with Adrian Bacon and Todd Friedman re: Changes	0.8
1/18/2021	Revise Preliminary Approval Motion and Draft Declarations, Send For Review	6.1
1/20/2021	Receive and Review Demographic Info from Defendant, Update Declaration	2
1/21/2021	Call Between Steve Soliman and Tom Wheeler re: Revised Preliminary Approval Motion	1
1/22/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Revised Preliminary Approval Motion	1.4
1/22/2021	Revise Preliminary Approval Motion per: Call	1.2
1/26/2021	Emails with Defendant re: Status of Declarations	0.6
1/26/2021	Review Defendant's Declarations, Revise	1.4
1/27/2021	Prepare all documents and redlines, send to Defendant	4
1/27/2021	Review Defendant's Comments	1.2
1/28/2021	Review and Revise Preliminary Approval Motion with Defendant's Comments	1.8
1/28/2021	Emails with Defendant re: Revisions	0.7
1/28/2021	Call between Adrian Bacon and Tom Wheeler re: Finalizing Revised Motion	1.5
1/28/2021	Finalize and File Revised Motion for Preliminary Approval, Email To Defendant	4.4
2/1/2021	Email with Defendant re: Website Name	0.3
3/4/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Status of Matter	1
3/5/2021	Receive and review Court's tentative ruling	0.8
3/5/2021	Email Tentative Ruling to PNC	0.3
3/6/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Tentative Ruling	1

**TIME ENTRIES: Tom E. Wheeler, Esq. – Senior Associate**

Date	Task	Hours
3/6/2021	Call with Tom Wheeler and Adrian Bacon with Defendant re: Tentative Ruling	0.7
3/6/2021	Note to File re: Tentative Ruling Call	1
3/7/2021	Call Between Adrian Bacon and Tom Wheeler re: Motion for Preliminary Approval	1.3
3/8/2021	Call Between Adrian Bacon and Tom Wheeler re: hearing	1
3/8/2021	Call Between Tom Wheeler and Steve Soliman re: hearing	0.8
3/12/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: revisions	1
3/12/2021	Note to file re: Call	0.5
3/15/2021	Revise Preliminary Approval Documents re: Order	3.8
3/16/2021	Send Revised Documents For Review	0.3
3/16/2021	Finish revisions to Approval Documents re: Order	3.1
3/17/2021	Call between Tom Wheeler and Adrian Bacon re: Settlement Agreement Language	1
3/17/2021	Email Settlement Agreement Revisions to Defendant	0.8
3/17/2021	Email to Defendant re: Documents	0.3
3/24/2021	Email to Defendant re: Documents	0.4
3/24/2021	Receive and Review Defendant's revisions to documents	1.8
3/25/2021	Revise claim, exclusion, and objection form, send to Defendant	2
3/30/2021	Emails with PNC re: Administration Costs	0.6
3/30/2021	Draft Joint Status Report, Send to Defendant	1
3/30/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Status of Matter	1.2
3/30/2021	Finalize and File Joint Status Report	0.8
3/30/2021	Review and Revise Stipulation To Move Preliminary Approval Hearing	1
4/1/2021	Emails with PNC re: Administration Costs	0.3
4/2/2021	Email with JND re: Administrator Bid	0.7
4/9/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: JND Bid	0.5
4/12/2021	Email Defendant re: JND Bid	0.3
4/21/2021	Emails re: Settlement Administration Bids	0.5
4/28/2021	Receive and review Defendant's revised notice language	0.3
4/28/2021	Call Between Adrian Bacon, Todd Friedman, and Tom Wheeler re: Notice Language	0.8
4/29/2021	Email to Defendant re: revisions and status	0.5
5/3/2021	Revise Settlement Agreement language, send to Defendant	0.8
5/3/2021	Call Between Adrian Bacon and Tom Wheeler re: Settlement Language	0.6
5/4/2021	Review and Finalize Revised Settlement Agreement	1
5/4/2021	Update Preliminary Approval Motion and Exhibits, Distribute to Plaintiff's Counsel	4.2
5/5/2021	Call Between Tom Wheeler and Steve Soliman re: Revisions	1
5/5/2021	Review revisions, update, forward to Todd Friedman	1
5/6/2021	Call Between Todd Friedman and Tom Wheeler re: Preliminary Approval Motion	0.8

**TIME ENTRIES: Tom E. Wheeler, Esq. – Senior Associate**

Date	Task	Hours
5/6/2021	Revise Preliminary Approval Motion and Exhibits, Circulate to Adrian Bacon and Defendant	4
5/6/2021	Emails with PNN re: Declaration and Administration	1.3
5/7/2021	Emails with PNN re: Administration	0.4
5/7/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Status	1
5/7/2021	Call Between Tom Wheeler and Adrian Bacon re: Preliminary Approval Documents	1
5/8/2021	Receive and Review Comments from Defendant re: Motion	2
5/8/2021	Begin Finalizing Motion, Declaration, and Exhibits	5
5/8/2021	Call Between Tom Wheeler and Adrian Bacon re: Preliminary Approval Documents	0.8
5/9/2021	Receive and Review Defendant's Revised Declarations, Approve	0.6
5/9/2021	Finalize Motion, Declaration, Exhibits	3
5/10/2021	Emails with PNN re: Declaration Status	0.5
5/10/2021	Emails with Defendant re: finalizing motion	0.5
5/10/2021	Finalize and File Motion for Preliminary Approval, Email Defendant	4
5/10/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Status	1
5/11/2021	Draft Joint Status Report, Send to Defendant	0.8
5/17/2021	Receive and Review Tentative Ruling Granting Motion	0.3
5/17/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Tentative Ruling, Next Steps	1.2
5/17/2021	Email with Defendant re: submission on tentative	0.5
5/17/2021	Email with PNN re: Order	0.6
5/17/2021	Revise Preliminary Approval Order, send to Defendant	1.2
5/17/2021	Finalize and File Revised Preliminary Approval Order	1
5/18/2021	Emails with PNN re: Notice	0.5
5/21/2021	Email to PNN with Documents	0.6
5/21/2021	Call with Tom Wheeler, Todd Friedman, PNC, and Defendant re: Notice Kickoff	0.8
5/21/2021	Notes to file re: Call	0.4
6/2/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Status	0.5
6/2/2021	Emails with PNN re: Documents	0.6
6/8/2021	Call between Tom Wheeler, Todd Friedman, PNC, and Defendant re: Data Transfer Status	0.5
6/16/2021	Emails re: Status of Signed Order	0.5
6/16/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Status	0.4
6/22/2021	Email to Court re: Status of Signed Order	0.4
6/22/2021	Emails re: Updated Proposed Order	0.3
6/22/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Status	1
6/22/2021	Revise Proposed Order	0.5

**TIME ENTRIES: Tom E. Wheeler, Esq. – Senior Associate**



Date	Task	Hours
6/28/2021	Emails re: Data Privacy Issue	0.4
6/28/2021	Call Between Tom Wheeler and Adrian Bacon re: Data Privacy Issue	0.5
6/29/2021	Finalize and File Revised Preliminary Approval Order	1
7/1/2021	Receive and Respond to Court Email re: Hearing Date	0.5
7/1/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Status	1
7/6/2021	Receive Signed Preliminary Approval Order, Email PNN	1
7/9/2021	Emails re: Claims Administration Deadlines	0.7
7/9/2021	Call Between Tom Wheeler and Todd Friedman re: Claims Administration	0.8
7/12/2021	Call with Tom Wheeler and PNN re: Administration	0.5
7/19/2021	Call Between Steve Soliman and Tom Wheeler re: Fee Motion	0.8
7/19/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Notice and Fee Motion	1.5
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	Call Between Adrian Bacon and Tom Wheeler re: Class Member Response and Motions	1.1
8/18/2021	Call Between Tom Wheeler, Adrian Bacon, Todd Friedman, and Steve Soliman re: Response Rate	1
8/18/2021	Emails with PNN re: Claims Administration Response	0.6
8/19/2021	Emails with PNN re: Objections	0.7
8/19/2021	Review Objections, Notes to File	3
8/19/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Objections and Drafting of Final Approval and Fee Motions	1.5
8/20/2021	Emails with PNN re: Claims Administrator Declaration	0.8
8/23/2021	Emails with Defendant and PNN re: Class Notice Rates	1
8/23/2021	Call with Tom Wheeler, Adrian Bacon, and Todd Friedman re: Final Approval and Fee Motion Status	0.8
8/23/2021	Call with Steve Soliman and Tom Wheeler re: Declaration and Motion Status	0.5
8/26/2021	Emails with PNN re: New Claims Update and Objections	0.7
8/26/2021	Review Objections, Notes to File	1.3
8/26/2021	Call Between Tom Wheeler and Adrian Bacon re: Objections	0.8
8/26/2021	Emails with Defendant and PNN re: Email Bounceback	0.8
8/27/2021	Call Between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Motions, Deadlines	1
8/30/2021	Call Between Tom Wheeler and Adrian Bacon re: Claims, Motions	1
9/1/2021	Call Between Todd Friedman, Adrian Bacon, Tom Wheeler, Steven Soliman re: Motions and Deadlines	0.8
9/2/2021	Call between Tom Wheeler, Adrian Bacon, and Todd Friedman re: Motions, Deadlines, Claims, Administration	2

**TIME ENTRIES: Tom E. Wheeler, Esq. – Senior Associate**

Date	Task	Hours
9/2/2021	Begin Consolidating Revisions of Motion for Fees, Motion for Final Approval	6.2
9/3/2021	Call between Tom Wheeler and Steve Soliman re: Revisions	1.2
9/3/2021	Call between Tom Wheeler and Adrian Bacon re: Revisions	1
9/3/2021	Call between Tom Wheeler and Todd Friedman re: Revisions	1
9/3/2021	Finish Consolidating Revisions, Begin Reviewing All Motions and Exhibits	5.8
9/6/2021	Review hours and complete hours report	2.8
9/6/2021	Call between Adrian Bacon and Tom Wheeler re: Motions for Final Approval and Fees	1.2
9/6/2021	Clean-up Exhibits, Declarations, Circulate	4.3
9/7/2021	Continue revisions to Motions for Final Approval, Fees, and Exhibits, Clean Up	6.1
9/7/2021	Call between Adrian Bacon and Tom Wheeler re: New Notice Language	0.6
9/7/2021	Review Proposed Email Language	0.3
9/7/2021	Emails re: Proposed Email Language	0.3
9/7/2021	Call with Defendant re: New Notice	0.6
9/7/2021	Call between Todd Friedman, Tom Wheeler, and Adrian Bacon re: New Notice	1
9/8/2021	Call between Todd Friedman and Tom Wheeler re: Motions for Final Approval and Fees	0.8
9/8/2021	Call between Adrian Bacon and Tom Wheeler re: Motions for Final Approval and Fees	1.5
9/8/2021	Revise Proposed Judgment and Order to Comply with CMO, Send to Defendant	2.1
9/8/2021	Call with Tom Wheeler and PNN re: Declaration Requirements	0.5
9/8/2021	Review PNN's Declaration, Email Proposed Revisions	0.6
9/8/2021	Further Revisions to Motion for Fees and for Final Approval	5.2
9/8/2021	Call with Todd Friedman, Tom Wheeler, PNC, and Defendant	0.8
9/8/2021	Call between Adrian Bacon and Tom Wheeler re: New Notice	0.5
9/8/2021	Review Defendant's Stipulation re: New Notice	0.5
9/8/2021	Call between Tom Wheeler and Steve Soliman re: Motions and New Notice	1
9/9/2021	Finish all revisions to Motions, Exhibits, Declarations, Circulate for Final Review	5.2
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 Adrian Bacon re: Final Approval Motion	0.8
9/9/2021	Call Between Tom Wheeler and Steve Soliman re: Declarations	1
9/9/2021	Finalize All Revisions, Consolidate Exhibits, File!	6.3

**TOTAL TIME – 648.1**  
**LODESTAR - \$307,847.50**

**TIME ENTRIES: Tom E. Wheeler, Esq. – Senior Associate**