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15 Attorneys for Plaintiffs

16

17

UNITED STATES DISTRICT COURT

18

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19

20 NATIONAL FEDERATION OF THE
BLIND, NATIONAL FEDERATION OF
21 THE BLIND OF CALIFORNIA,
MICHAEL KELLY, MICHAEL
22 HINGSON, and MICHAEL PEDERSON,

23

Plaintiffs,

24

v.

25

UBER TECHNOLOGIES, INC.,

26

Defendant.

27

28

Case No. 3:14-cv-04086-NC

DECLARATION OF MICHAEL W. BIEN IN SUPPORT OF PLAINTIFFS' MOTION FOR FEES AND COSTS

Judge: Hon. Magistrate Nathanael Cousins

Date: November 10, 2016

Time: 10:00 a.m.

Crtrm.: D, 450 Golden Gate Avenue, San Francisco, CA 94102

1 I, Michael W. Bien, declare,

2 1. I am an attorney admitted to practice law in California, a member of the bar
3 of this Court, and a partner in the law firm of Rosen Bien Galvan & Grunfeld LLP
4 (“RBGG”), counsel of record for Plaintiffs. I have personal knowledge of the matters set
5 forth herein, and if called as a witness I could competently so testify. I make this
6 declaration in support of Plaintiffs’ Motion for Attorneys’ Fees and Expenses.

7 **Plaintiffs’ Counsel Achieved Remarkable Results In This Novel Case**

8 2. This case and the results achieved are immensely important for several
9 reasons: First, Plaintiffs secured comprehensive relief ensuring that every service animal
10 user in the United States will consistently receive reliable access to the nation’s largest
11 door-to-door transportation service. Under the terms of the settlement, Uber has agreed to
12 provide consistent and clear information to each of its drivers detailing their legal
13 obligation to serve persons with service animals on an equal basis, and will require both
14 new and current drivers to affirmatively confirm their understanding of this obligation.
15 Uber will implement a stringent enforcement policy to remove discriminatory drivers from
16 the platform. Uber will also implement a comprehensive written service animal policy that
17 informs riders of their rights, clarifies driver obligations and discipline, requires improved
18 customer service and complaint responses, and limits cleaning fee charges for service
19 animal users. The settlement also includes robust data-gathering requirements, third-party
20 monitoring, testing by the National Federation of the Blind (“NFB”), and dispute
21 resolution measures.

22 3. In addition, the Court’s order denying Uber’s motion to dismiss construed
23 the ADA’s public accommodations provisions as specifically applicable to ridesharing
24 services, which heralds the ADA’s applicability to sharing economy businesses more
25 generally. The order also broadly construed associational standing and deterrence standing
26 for disability rights Plaintiffs, opening the door to additional legal challenges to disability
27 discrimination committed by businesses that condition use of services on agreements to
28 arbitrate claims.

1 4. This case and its settlement clearly communicate that sharing economy and
2 other businesses that attempt to shield themselves from civil rights liability must take the
3 ADA and other similar antidiscrimination mandates seriously. In addition, as a result of
4 this case and the cases which will rely and build upon it, transportation companies
5 throughout the country that discriminate against people with visual disabilities who use
6 guide dogs will be deterred from continuing their discriminatory practices and will be
7 forced to bring their businesses into conformity with the law.

8 **My Professional Background**

9 5. Upon graduation from Northwestern University School of Law in 1980, I
10 joined the law firm of Brobeck, Phleger & Harrison as a litigation associate. I was elected
11 to partnership at Brobeck in 1987. In December 1990, I left Brobeck and formed the law
12 firm, Rosen, Bien & Asaro (which became Rosen Bien Galvan & Grunfeld LLP in 2012),
13 where I am managing partner. I have worked exclusively in litigation throughout my
14 career. The vast majority of my time has been spent on complex litigation in the state and
15 federal courts, usually involving issues of state and federal antitrust laws, RICO, class
16 actions, unfair competition, civil rights (including disability rights), intellectual property,
17 attorneys' fees or banking law. I have served as plaintiffs' counsel and defense counsel in
18 numerous complex class actions, including nationwide certified classes and MDL
19 proceedings, in the areas of antitrust, securities and banking laws. I have received
20 numerous awards and instances of peer recognition for my litigation work, including but
21 not limited to, Martindale Hubble AV-rating, repeated selection for the Northern
22 California "Super Lawyer" list in Civil Rights, First Amendment, and Business Litigation,
23 and a 2010 CLAY Award. I have been named by the San Francisco and Los Angeles
24 Daily Journal to its list of the Top 100 Lawyers in California several times, including most
25 recently in 2015. I have been recognized by Best Lawyers in America for Commercial
26 Litigation since 2013. A true and correct copy of my resume is attached hereto as
27 **Exhibit A.**

28

1 6. I have been lead or co-lead counsel in numerous cases on behalf of persons
2 or classes of persons with disabilities brought against public and private entities, including
3 prisons. These cases include:

- 4 • *Greener v. Shell Oil Co.*, 3:98-CV-02425-BZ (N.D. Cal.), a national ADA
5 class action brought to ensure physical access for people with disabilities at
6 gas stations that resulted in a comprehensive national settlement;
- 7 • *Hernandez v. County of Monterey*, 5:13-CV-2354-PSG (N.D. Cal.) a class
8 action brought under the 8th and 14th Amendments to the United States
9 Constitution, the ADA, the Rehabilitation Act, and state law on behalf of
10 inmates at the Monterey County Jail. The case achieved a comprehensive
11 class settlement to improve access to services for inmates at the Jail;
- 12 • *Gates v. Deukmejian*, No. 91-15270 (9th Cir.), a class action under the
13 Eighth Amendment and the Rehabilitation Act on behalf of all prisoners at
14 the California Medical Facility at Vacaville that achieved a comprehensive
15 settlement that included improved access to medical and mental health care
16 and access to programs and services for inmates with HIV;
- 17 • *Brown v. Plata/Coleman*, 131 S. Ct. 1910 (2011), a class action under the 8th
18 and 14th Amendments on behalf of all California prisoners with serious
19 mental illness, resulting in statewide injunctive relief after trial, 912 F. Supp.
20 1282 (E.D. Cal. 1995), and subsequent remedial process including a three-
21 judge court trial ordering population reduction affirmed by the Supreme
22 Court in 2011;
- 23 • *Hecker v. California Dep't of Corrections and Rehabilitation*, 2:05-cv-
24 02441-KJM-DAD (E.D. Cal.), an ADA and Rehabilitation Act putative class
25 action lawsuit against the California Department of Corrections and
26 Rehabilitation on behalf of all prisoners with psychiatric disabilities, which
27 achieved a statewide settlement, including several significant statewide
28 policy changes to end discriminatory practices and guarantee equal access to

1 programs and services;

- 2 • *Armstrong v. Brown*, 4:94-cv-2307-CW (N.D. Cal.), a class action under the
- 3 ADA, Rehabilitation Act and 14th Amendment against the State on behalf of
- 4 California prisoners with disabilities where plaintiffs secured system-wide
- 5 injunctive relief to end discrimination;
- 6 • *L.H. v. Schwarzenegger*, 2:-06-02042-LKK-DAD (E.D. Cal.), a class action
- 7 under the 8th and 14th Amendments, the ADA, and the Rehabilitation Act on
- 8 behalf of all juvenile wards and parolees in California's Department of
- 9 Juvenile Justice that resulted in an agreement from the State to implement
- 10 practices and procedures to ensure that juvenile parolees receive fair
- 11 hearings, and;
- 12 • *Berkeley Center for Independent Living v. Oakland Coliseum*, 3:96-cv-
- 13 03649-WHO (N.D. Cal.), a successful federal court ADA action on behalf of
- 14 a class of individuals with disabilities for damages and injunctive relief
- 15 against the Coliseum, its public entity owners, and all sports teams and
- 16 entertainment companies operating there.

17 7. I also have extensive experience in attorneys' fees litigation. My experience
 18 in attorneys' fees litigation includes negotiation, mediation, law and motion, evidentiary
 19 hearing, and trial and appellate work in both state and federal courts. I have served as lead
 20 counsel or specially-retained fees counsel and have been an expert witness on numerous
 21 attorneys' fees issues, including hourly rates, billing, and staffing practices.

22 8. I have become familiar with the rates charged and the billing and work
 23 practices of lawyers in California and the nation in many ways: (1) as a billing partner
 24 negotiating rates and discussing bills for legal representation with individual and corporate
 25 clients; (2) from my own considerable involvement in attorneys' fees litigation and expert
 26 consultations and testimony; (3) by discussing attorneys' fees, billing, and work practices
 27 with other attorneys; (4) by representing other attorneys seeking fees; (5) by obtaining
 28 declarations from other attorneys regarding market rates, attorneys' fees, billing and work

1 practices; (6) by reviewing surveys, legal newspapers, reported decisions, and treatises
2 regarding prevailing attorneys' rates, fees, billing and work practices; (7) by reviewing
3 attorneys' fees applications and awards in other cases, as well as unpublished decisions;
4 (8) by reviewing rates charged by, and billing and work practices of, other firms that my
5 firm has retained or associated with; and (9) by conducting research in my preparation for
6 testimony as an expert.

7 9. Over the past thirty years, I have developed considerable expertise in
8 negotiating, developing, monitoring and enforcing complex post-judgment remedial
9 policies and procedures in class action civil rights cases. I have litigated numerous post-
10 judgment enforcement actions, including evidentiary hearings and trials and contempt
11 motions, and defended orders resulting from these efforts in multiple cases in the appellate
12 courts. I have expertise in the law and procedures governing Special Masters, post-
13 judgment enforcement of orders and settlements, and effective policy and practice to
14 effectuate institutional reform in complex organizations.

15 **RBGG Has Extensive Experience In Disability Rights Litigation And In**
16 **Implementing Complex Remedial Policies**

17 10. The attorneys from Rosen Bien Galvan & Grunfeld LLP, Disability Rights
18 Advocates, and TRE Legal Practice (collectively "Class Counsel") working on behalf of
19 the Plaintiff class bring a substantial amount of experience and expertise in disability rights
20 litigation. Plaintiffs' Counsel have been repeatedly recognized for their excellence in civil
21 rights, disability rights, and complex class-action litigation. In their work on this case and
22 in other matters involving similar transportation access issues, Plaintiffs' Counsel have
23 spoken with and corresponded with over one hundred blind persons who travel with guide
24 dogs.

25 11. From its formation in 1990 as a litigation boutique, one of RBGG's
26 specialties has been complex class-action litigation in trial and appellate courts in the areas
27 of antitrust, employment, civil rights, banking and consumer law, voting rights and
28 disability rights. RBGG also has experience using structured negotiations to resolve

1 disability access issues outside of court and with representing disability rights and civil
2 rights organizations in litigation as amici.

3 12. RBGG has the capacity to thoroughly and vigorously prosecute the claims in
4 this case and to properly represent the plaintiff class. RBGG has committed all necessary
5 resources to do so.

6 13. RBGG is uniquely well qualified to efficiently and effectively monitor and
7 enforce the settlement in this case. RBGG has extensive experience monitoring and
8 enforcing compliance with remedial measures in numerous civil rights and disability rights
9 class actions. For example, to monitor and implement remedial policies in prison and
10 parole cases, RBGG attorneys work with Special Masters and their experts, regularly visit
11 prisons, jails, and parole offices, observe parole revocation proceedings, review files,
12 attend correctional and parole officer training, and interview correctional staff. Our
13 attorneys are trained to analyze and identify systemic compliance problems and bring them
14 to the attention of the Defendants and the Court, when necessary.

15 **RBGG's Requested Reasonable Hours**

16 14. As the managing partner at RBGG, I have supervised all of the legal work
17 performed by RBGG on this matter, including that of associate lawyers, law clerks,
18 paralegals, and secretarial staff, since RBGG joined the case as co-counsel in April 2015. I
19 have served as the senior partner on this case, and I have coordinated the day-to-day work
20 performed by RBGG attorneys and support staff, at times coordinating this effort with my
21 partner Ernest Galvan. When associate Michael Nunez joined our firm in April 2015, the
22 National Federation of the Blind of California and Larry Paradis asked our firm to join the
23 legal team as co-counsel so that Mr. Nunez could continue his work on this case. Mr.
24 Nunez had played a central role on the case at Disability Rights Advocates and was
25 therefore already familiar with the record, the facts, and the relevant law. RBGG
26 paralegals Karen Stilber and Greg Gonzalez were also assigned to the case.

27 15. RBGG has been intimately involved in every aspect of this litigation since it
28 joined the case. RBGG joined the case as settlement negotiations began and as the parties

1 began to prepare for trial. Over the course of the litigation, I participated in settlement
2 meetings, participated in strategy meetings with the legal team, and revised drafts of briefs,
3 settlement proposals, and the preliminary approval papers.

4 16. I assigned drafting, research, and other day-to-day case tasks to Mr. Nunez.
5 Mr. Nunez drafted Plaintiffs' mediation brief, drafted discovery requests, was highly
6 involved in revising the settlement agreement, drafted some addendums to the settlement
7 agreement, drafted the motion for preliminary approval and many of the supporting papers,
8 and appeared for Plaintiffs at several hearings including the hearing on Plaintiffs' motion
9 for preliminary approval of class settlement. Mr. Nunez was also highly involved in
10 revising all of Plaintiffs' written discovery requests, and led several of the discovery meet-
11 and-confer sessions with Defendants.

12 17. Paralegals were responsible for interviewing blind individuals who reported
13 service animal discrimination by Uber drivers. Paralegals also conducted factual research
14 and assisted with finalizing and filing case documents.

15 18. By dividing tasks among three firms, class counsel minimized any
16 duplication of efforts and ensured that the resources necessary to the successful
17 prosecution of this high-impact case were available throughout the litigation.

18 19. I require all RBGG staff, including myself, to keep contemporaneous and
19 highly reliable time records of the amount of time spent on each activity related to this
20 case. My partner, Ernest Galvan, has reviewed each time entry for every timekeeper in this
21 matter, and has made reasonable billing judgments to eliminate excessive, duplicative, and
22 unnecessary billing entries. In addition, Mr. Galvan reduced to zero all hours spent by any
23 RBGG attorney on this matter who billed fewer than 20 hours on the merits over the
24 course of the case. Mr. Galvan also zeroed out all merits hours spent by any RBGG
25 paralegal who had spent fewer than 10 hours on the case. As a result of this discretionary
26 reduction, there are five fewer attorneys and two fewer paralegals for whom RBGG is
27 claiming attorneys' fees. I regularly rely on Mr. Galvan to perform billing judgment
28 reductions to RBGG time entries that my firm submits in support of fees motions. I have

Title	Name	Law School Graduation	Rate
Partner	Michael W. Bien	1980	\$900
	Ernest Galvan	1997	\$740
Associate	Michael Nunez	2011	\$460
Paralegal	Karen Stilber	N/A	\$300
	Greg Gonzalez	N/A	\$275
Summer Associate	Eric Monek Anderson	N/A	\$275

23. RBGG's rates are wholly consistent with the rates charged by comparable attorneys and legal staff in the San Francisco Bay Area and numerous other locales within California for work comparable to that performed in the instant case. (In fact, they are lower than rates at many San Francisco Bay Area firms.) My firm's billing practices are similarly comparable to those of other attorneys and legal staff in the San Francisco Bay Area and elsewhere in California. My firm's billing rates are charged to and paid by our many clients who pay by the hour on a monthly billing basis, in matters arising both inside and outside the State of California. They are also the rates we claim in our fee applications in all our fee-shifting cases, both inside and outside the San Francisco Bay Area. These contain no contingency, delay or preclusion components.

24. RBGG attorneys are nationally recognized for their excellence in disability law, civil rights litigation, and complex class action litigation. *See, e.g., L.H. v. Schwarzenegger*, 645 F. Supp. 2d 888, 895 (E.D. Cal. 2009) ("observ[ing] that Michael Bien has been recognized as a 'genuine expert in the area of complex, institutional prison reform litigation,' so as to merit exceptional fees") citing *Lucas v. White*, 63 F. Supp. 2d 1046, 1061-62 (N.D. Cal. 1999). This experience has led courts throughout California and the nation, including the United States District Court for the Northern District of California, to award RBGG fees at its full market rates, in part based on its superior experience and reputation. *See, e.g., Armstrong v. Brown*, 805 F. Supp. 2d 918, 922 (N.D.

1 Cal. 2011) (compelling defendants to pay RBGG’s “reasonable 2010 hourly rates”
2 including \$700 for Michael Bien and \$560 for Ernest Galvan); *L.H.*, 645 F. Supp. 2d at
3 895 (RBGG partners Bien and Galvan obtaining their 2008 rates: \$640 and \$450,
4 respectively); *see also Hernandez v. Cnty. of Monterey*, 5:13–CV–2354–PSG (N.D. Cal.)
5 (approving RBGG’s requested lodestar based on RBGG’s 2015 market rates). Similarly,
6 the rate sought for work performed by paralegals and law students is reasonable and
7 commensurate with prevailing market rates in the Bay Area. *See, e.g., Hernandez*, 5:13–
8 CV–2354–PSG (approving RBGG’s requested lodestar based in part on RBGG’s 2015
9 rates for paralegals up to \$295); *Armstrong*, 805 F. Supp. 2d at 922 (compelling defendants
10 to pay RBGG’s paralegals at 2010 rates up to \$240 per hour).

11 25. My partner, Ernest Galvan, has practiced complex civil litigation since 1998.
12 He received his J.D. from Yale Law School in 1997, and clerked in the United States
13 District Court for the Central District of California for the Honorable Dean D. Pregerson.
14 Upon completing his clerkship, he joined my law firm Rosen, Bien & Asaro as an
15 associate. He became a partner of the firm in 2006. Mr. Galvan has led numerous
16 litigation efforts in the *Armstrong* prison disability rights case, as well as in *Coleman v.*
17 *Brown*, 438 Fed. Appx. 743 (9th Cir. 2011) (involving mental health care for a statewide
18 class of prisoners with severe mental illness) and *Valdivia v. Schwarzenegger*, 599 F.3d
19 984 (9th Cir. 2010) (involving parolee rights). Mr. Galvan won a California Lawyer of the
20 Year Award in 2012 for his successful oral advocacy before the California Supreme Court
21 in *Retired Employees Association of Orange County v. County of Orange*. His resume is
22 attached hereto as **Exhibit C**.

23 26. Associate Michael Nunez received his J.D. in 2011 from Stanford Law
24 School where he was Senior Editor and Symposium Editor for the Stanford Law and
25 Policy Review and participated in the Environmental Law Clinic. Mr. Nunez has
26 substantial experience representing blind and low-vision persons and others with sensory
27 disabilities in disability rights litigation involving access to transportation services,
28 technology, and voting. He represented blind and low-vision persons in *National*

1 *Federation of the Blind v. RideCharge, Inc.*, 14-cv-2490 JFW (C.D. Cal.), an action
2 challenging access to touchscreen payment systems in taxis resulting in a settlement
3 wherein RideCharge agreed to make its touchscreen payment systems accessible. Mr.
4 Nunez also successfully represented a California-wide class of blind and low-vision
5 persons in *Lighthouse for the Blind and Visually Impaired v. Redbox Automated Retail,*
6 *LLC*, C12- 00195 PJH (N.D. Cal.), an action challenging the absence of non-visual access
7 features on Redbox’s touchscreen video rental kiosks resulting in a settlement wherein
8 Redbox agreed to modify all of its more than 4,000 kiosks in California to make them
9 accessible to blind persons. Furthermore, he played a central role in litigating *California*
10 *Council of the Blind v. County of Alameda*, 13–cv–03443–JCS (N.D. Cal.), wherein a
11 federal court ruled for the first time that the Americans with Disabilities Act and Section
12 504 of the Rehabilitation Act protect the right of blind voters to vote privately and
13 independently. Prior to joining RBGG, he was a staff attorney at Disability Rights
14 Advocates. He was named a Rising Star by Northern California Super Lawyers in 2016.
15 His resume is attached hereto as **Exhibit D**.

16 27. Paralegals at RBGG are college graduates who have worked for at least one
17 year as paralegal clerks under the supervision of RBGG’s attorneys. Paralegal Karen
18 Stilber is a graduate of the University of North Carolina – Chapel Hill, where she earned
19 her B.A. in International Studies, and has worked as a paralegal for over sixteen years.
20 Paralegal Gregorio Gonzalez is a graduate of San Francisco State University, where he
21 earned his B.A. in History, and he has worked as a paralegal since 2014. Ms. Stilber’s rate
22 is \$300, which is more than justified by her educational background and her 25-year career
23 in the legal industry. Mr. Gonzalez’s rate is \$275, which is well justified by his
24 educational background, and specialized complex litigation experience at my firm. Copies
25 of the paralegal resumes are attached hereto as **Exhibit E**.

26 28. RBGG has spent nearly eighteen months litigating and negotiating settlement
27 in this action on a fully contingent basis, receiving no compensation for the duration of the
28 litigation and fronting litigation expenses. RBGG paid the wages of lawyers and other

1 legal staff over this period to fund the prosecution of this case. The time and labor
2 required for this case, committed on a contingent basis, precluded Plaintiffs' Counsel from
3 productive work on other class action and complex litigation cases.

4 29. Based on my experience in managing a law firm for more than 25 years and
5 in practicing law for more than 35 years, and my representation of law firms in attorneys'
6 fees litigation, consulting and representing clients concerning fee matters, and examination
7 of legal billing practices, I know that plaintiffs' attorneys cannot take on complex
8 contingent cases like this action without some reasonable expectation of additional
9 compensation beyond market rates in the event of success, because of the risk of loss.
10 Setting the fee to reflect the risk of loss makes contingent risk cases competitive in the
11 legal marketplace and is necessary to ensure that meritorious cases will be brought to
12 enforce important civil rights laws. Without accounting for contingent risk, plaintiffs
13 seeking to enforce these important laws would face substantial difficulty in obtaining
14 counsel.

15 30. This case presented many legal issues of first impression as well as unique
16 and nuanced issues to tackle in the settlement negotiations. To my knowledge, this is the
17 first case in the nation considering the application of the ADA's protections for guide dog
18 users to a "ride sharing" transportation service such as Uber. At the time this case was
19 filed, there were no published rulings on the application of disability access laws to
20 transportation network companies. In addition, the parties devoted significant time to
21 developing mechanisms from the ground up to inform all drivers about their legal and
22 contractual obligation to transport riders with service animals within the context of Uber's
23 business model, wherein Uber classifies drivers as independent contractors. The parties
24 also devoted substantial time to developing effective and reasonable practices to enforce
25 Uber's service animal policy. We did not and could not maintain separate billing records
26 for work on our claims under the ADA, the Unruh Act, or the Disabled Persons Act.

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1 The legal theories under these three statutes almost completely overlap, and Plaintiffs'
 2 Counsel did not treat the case as having distinct ADA, Unruh Act, or Disabled Persons Act
 3 components.

4 **RBGG's Costs and Expenses**

5 31. RBGG also advanced litigation expenses for this case over the past
 6 seventeen months. Plaintiffs incurred costs and expenses of \$1,184.35 in litigating this
 7 matter through September 9, 2016. Below is a summary chart of RBGG's costs and
 8 expenses incurred during this time. Details are provided with the billing statement at
 9 Exhibit B of this declaration. If the Court requires additional backup, such as invoices, I
 10 can provide such backup.

CATEGORY	Total
Computerized Legal Research	\$672.35
Copying	\$219.40
PACER Docket Access Charges	\$26.10
Postage and Delivery	\$142.40
Transcription	\$124.10
Grand Total	\$1,184.35

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 16 32. It is RBGG's consistent practice to bill our clients for computerized research
 17 charges, such as Westlaw, as well as interpreters, court reporters, long-distance telephone
 18 calls, faxes, investigators, and travel. It would not be appropriate to include these costs in
 19 our overhead as to do so would require a major increase in our firm's overall costs and
 20 billing rates when these costs are only required by a fraction of our clients and/or only
 21 some of the time during their case. This billing practice is consistent with the billing
 22 practices of lawyers practicing in the Northern District of California.

23 **RBGG's Work On This Fee Motion**

24 33. RBGG attorneys and staff have devoted 58.3 billable hours through
 25 September 9, 2016 on recovery of their attorneys' fees and costs, of which we have written
 26 down over 11 hours, and are claiming 46.7 hours with this application, in the amount of
 27 \$26,410. Attached hereto as **Exhibit F** is a true and correct copy of a summary table of the
 28 fees for fees work, as well as RBGG's time records for work performed preparing

1 Plaintiffs’ motion for reasonable attorneys’ fees and costs and supporting papers.
2 Plaintiffs attempted to negotiate resolution of Plaintiffs’ claim for attorneys’ fees and costs
3 in this matter but were unable to come to a resolution.

4 34. By limiting the calculation of Plaintiffs’ Counsel’s lodestar to work
5 performed through September 9, 2016, Plaintiffs’ lodestar does not capture all of the work
6 performed drafting this motion and supporting papers.

7 35. Plaintiffs’ Counsel will need to expend additional time preparing a reply in
8 support of this motion and preparing and presenting oral argument. Plaintiffs will submit
9 RBGG’s time records for additional time devoted to fee recovery work either with
10 Plaintiffs reply in support of this motion, or with the first annual fees application in the
11 process described in the Settlement Agreement at page 23 (Dkt. No. 85-1).

12 **Co-Counsel Rates and Hours**

13 36. I have been familiar with the work of the attorneys at Disability Rights
14 Advocates (DRA) for many years, and have more recently become familiar with the work
15 of Timothy Elder. These attorneys are extremely well qualified, and are uniquely
16 experienced in the area of complex federal litigation concerning the civil rights of persons
17 with disabilities. The hourly rates in this application for DRA timekeepers and for Mr.
18 Elder are well within, and closer to the low end of, the range of rates commanded by
19 attorneys of similar experience working on matters of comparable difficulty and
20 complexity. DRA and Mr. Elder worked efficiently on this matter, and incurred only the
21 hours necessary to prevail, and have taken substantial billing judgments to ensure that the
22 fees sought here are reasonable.

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Conclusion

37. Based on my experience and on negotiations in this case, we have negotiated an agreement with Defendants to obtain the same comprehensive reforms Plaintiffs would be entitled to pursuant to a total victory at trial to be affirmed on appeal. The work described in this declaration was essential to obtaining this superior result for Plaintiffs.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 19th day of September, 2016, at San Francisco, California.

By: /s/ Michael W. Bien
Michael W. Bien

EXHIBIT A



Michael W. Bien

50 Fremont Street, 19th Floor
San Francisco, California 94105-2235

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E: mbien@rbgg.com

Recognized for his significant legal work by various publications and organizations, Michael Bien has helped numerous clients resolve complex legal challenges. Mr. Bien has served as lead counsel in numerous trial and appellate proceedings in state and federal courts. In addition to his business practice, Mr. Bien has been at the forefront of public interest litigation on behalf of persons with limited access to the civil justice system.

PERSONAL DATA

Born: New York, N.Y., 1955

EDUCATION

J.D., *cum laude*, Northwestern University School of Law, Chicago, Illinois (1980), President, Student Bar Association; President, Founder and Director, Student Funded Public Interest Fellowships, Inc.

B.A., *magna cum laude*, Brandeis University, Waltham, Massachusetts (1977), high department honors in History and American Studies

National Institute of Trial Advocacy, National Session, Boulder, Colorado (1986)

BAR ADMISSION

California, January, 1981; member, United States Supreme Court, Ninth Circuit Court of Appeals and all United States District Courts in California

LEGAL EMPLOYMENT

Rosen Bien Galvan & Grunfeld LLP; San Francisco, California Managing Partner	1991–present
Brobeck, Phleger & Harrison, LLP; San Francisco, California Partner, Litigation Department	1987–1990
Associate, Litigation Department	1980–1987



REPRESENTATIVE REPORTED CASES:

Hernandez v. County of Monterey, 110 F. Supp. 3d 929 (N.D. Cal. 2015)

Hernandez v. County of Monterey, 305 F.R.D. 132 (N.D. Cal. 2015)

Hernandez v. County of Monterey, 70 F. Supp. 3d 963 (N.D. Cal. 2014)

Armstrong v. Brown, 732 F.3d 955 (9th Cir. 2013), *cert denied*, — S. Ct. —, 2014 WL 859563 (June 9, 2014)

Armstrong v. Brown, 857 F. Supp. 2d 919 (N.D. Cal. 2012)

Armstrong v. Brown, 805 F. Supp. 2d 918 (N.D. Cal. 2011)

Estate of Prasad v. County of Sutter, 958 F. Supp. 2d 1101 (E.D. Cal. 2013)

Coleman v. Brown, 28 F. Supp. 3d 1068 (E.D. Cal. 2014)

Coleman v. Brown, 938 F. Supp. 2d 955 (E.D. Cal. 2013)

Coleman v. Schwarzenegger, 922 F. Supp. 2d 882 (E.D. Cal. and N.D. Cal. 2009)

L.H. v. Brown, 848 F. Supp. 2d 1141 (E.D. Cal. 2011)

L.H. v. Schwarzenegger, 519 F. Supp.2d 1072 (E.D. Cal. 2007)

Brown v. Plata, 131 S. Ct. 1910 (2011) (briefed as co-lead counsel, secured favorable ruling in United States Supreme Court affirming lower court order to reduce prison overcrowding in California)

Armstrong v. Schwarzenegger, 622 F.3d 1058 (9th Cir. 2010) (argued, briefed as lead counsel, secured favorable ruling regarding federal disability rights and scope of federal regulations)

Armstrong v. Schwarzenegger, 805 F.3d 1058 (9th Cir. 2010)

Armstrong v. Davis, 318 F.3d 965 (9th Cir. 2003) (argued, briefed as co-lead counsel, secured favorable ruling regarding complex interaction among three separate federal statutory schemes governing remedies for disability discrimination)

Armstrong v. Davis, 275 F.3d 849 (9th Cir. 2001) (briefed as co-lead counsel, secured favorable rulings regarding class certification and federal court power to remedy civil rights violations by a state government)

Lucas v. White, 63 F. Supp.2d 1046 (N.D. Cal. 1999)

Wilson v. U.S. Dist. Court, 103 F.3d 828 (9th Cir. 1996) (argued, briefed as co-lead counsel, successfully defended favorable district court decision on statutory retroactivity)



Gates v. Shinn, 98 F.3d 463 (9th Cir. 1996) (argued, briefed as co-lead counsel, ruling clarified contempt powers in complex injunction cases)

Coleman v. Wilson, 101 F.3d 705 (9th Cir. 1996) (argued, briefed as co-lead counsel, successfully defended favorable preliminary injunction by having appeal dismissed for lack of jurisdiction)

Coleman v. Wilson, 912 F. Supp. 1282 (E.D. Cal. 1995)

Bui v. I.N.S., 76 F.3d 268 (9th Cir. 1996) (lead counsel, secured reversal of immigration appeals ruling)

Gates v. Gomez, 60 F.3d 525 (9th Cir. 1995) (argued, briefed as co-lead counsel, successfully defended almost all portions of federal injunctive relief against state government agencies)

Committee to Save Mokelumne River v. East Bay Mun. Utility Dist., 13 F.3d 305 (9th Cir. 1993) (lead counsel, successfully defended ruling on coverage of Clean Water Act)

Gates v. Deukmejian, 987 F.2d 1392 (9th Cir. 1992) (briefed as co-lead counsel, successfully defended core elements of district court's ruling on civil rights attorneys' fees)

REPRESENTATIVE MATTERS

Coleman/Plata v. Schwarzenegger, (co-lead counsel representing prisoner class in successful 2009 trial before federal three-judge court, affirmed by the U.S. Supreme Court, 131 S. Ct. 1910 (2011), holding that California must reduce prison overcrowding; succeeded on multiple appeals and writs in 9th Circuit and U.S. Supreme Court)

Azizian v. Federated Department Stores, 499 F.3d 950 (9th Cir. 2007) (co-counsel defending lead defendant, cosmetics company, Estee Lauder in state court antitrust action which was settled as a nationwide federal consent decree completed in 2009 including trial and appeal work)

Genencor, Inc. and Genentech, Inc. v. Pfizer, Inc. and Sonoma Foods, Inc. (co-counsel in successful defense of Pfizer in federal patent action against action for infringement of blocking patents in biotech case involving Kosher cheese)

Berkeley Center for Independent Living v. Oakland Coliseum (co-lead counsel representing plaintiff class in successful federal court ADA action against the Coliseum, its public entity owners and all sports teams and entertainment companies operating at Coliseum)

Computer Education Managers Association (antitrust consulting)

Equity Properties and Development Company (lead counsel in real estate/construction litigation matters in state court including trial and a successful appeal, *McGilvray v. Rouse*, (First District Court of Appeal 1996))



Fluor-Daniel Corporation (lead counsel representing construction company in various commercial litigation matters in state court)

IDG v. Diversified Data Corp., Santa County Superior Court (lead counsel in successful representation of software company in trade secrets, right-to-compete, litigation)

NextCard Inc. (lead counsel in representation of internet bank in various litigation matters including securities, antitrust, intellectual property, breach of contract and employment, in state and federal court)

Nordlin v. K Mart Corporation, California Court of Appeal, 5th District and California Supreme Court (1996) (representation of plaintiff in successful state court post-trial and appellate employment discrimination matter)

Primark Benefits (lead counsel in defense of various actions in state court arising from mergers and acquisitions)

Systron Donner v. Aerosafe International, Contra Costa County Superior Court and First District Court of Appeal (co-lead counsel in successful representation of former employees and their new company in state court intellectual property action alleging theft of trade secrets where inventions were patented, included appellate proceedings)

In re Coordinated Pretrial Proceedings in Petroleum Products Antitrust, (one of key attorneys on team in successful representation of defendant Union Oil Corporation of California in multi-year antitrust proceedings concerning oil and gas pricing)

BAR ACTIVITIES

Board Member, First District Appellate Project (2008-present)

Mediator and ENE Evaluation, United States District Court for Northern District of California (1994–present)

Bar Association of San Francisco, Judiciary Committee (Chair, 1989; Member, 1987–1989)

State Bar of California, Commission on Corrections (Member, 1987–1989)

American Bar Association, Antitrust Section, State Action and Internet Law Subcommittees; Litigation Section (1984–Present)

San Francisco Public Interest Law Foundation (Director, 1981–1983)

TEACHING, WRITING AND LECTURING

Presenter, American Bar Association Live Webinar, Recent Reforms in the Law of Solitary Confinement (2016)

Guest Lecturer, Jacobus TenBroek Disability Law Symposium, Baltimore (2016, 2014, 2012)

Guest Lecturer, International Conference on Solitary Confinement, University of Pittsburg Law School (2016)



Guest Lecturer, Juveniles in Adult Institutions, UC Hastings (2015)

Guest Lecturer, “De-incarceration through Civil Rights Litigation,” Northwestern University School of Law, the Roderick and Solange MacArthur Justice Center (2015)

Guest Lecturer, Sentencing & Corrections class, Stanford Law School (2014)

Guest Lecturer, “*Coleman/Plata* and Its Transformative Impact on California’s Prison System,” Stanford Law School, American Constitution Society (2014)

Guest Lecturer, Prisoners' Advocates, Loyola University School of Law, New Orleans (2014)

Guest Lecturer, UCI Law School (2013)

Guest Lecturer, AAJ Civil Rights Education Program (2013)

Guest Lecturer, “Health Care After *Plata*,” UC Hastings Law School Conference, California Correctional Crisis: Realignment & Reform (2013)

Guest Lecturer, Impact Fund’s 11th Annual Class Action Conference (2013)

Guest Lecturer, “Impact Litigation at the Appellate Level,” San Francisco Bar Association Panel(2012)

Guest Lecturer, “Realignment in California,” UC Irvine Law School, Public Dialogues Conference (2012)

Guest Lecturer, “Holding the Correction System Accountable,” Berkeley Law School, Caleb Foote Symposium (2012)

Guest Lecturer, “*Brown v. Plata*: The California Prison Overcrowding Crisis,” Northwestern University School of Law, American Constitution Society (2011)

Guest Lecturer, Prisoner Rights Law, Northwestern University School of Law (2011)

Joshua A. Guberman Lecture (with Jane Kahn), “Representing Prisoners with Serious Mental Illness, Trapped in a Nightmare: The California Prison Overcrowding Case,” Brandeis University (2011)

Guest Lecturer, Advanced Seminar on Criminal Law and Public Policy, Stanford University (2011)

Ruth Chance Lecture, “*Brown v. Plata*, 131 S. Ct. 1910 (2011),” University of California, Berkeley, Thelton E. Henderson Center for Social Justice (2011)

Guest Lecturer, “The California Prison Overcrowding Case: Strategic Considerations in the Representation of an Unpopular and Feared Class in the Defense of Fundamental Constitutional Rights,” University of Chicago Law School, American Constitution Society (2011)

Workshop Leader, “Bridging the Gap Between the Disability Rights Movement and Other Civil Rights Movements,” Jacobus tenBroek Disability Law Symposium (2011)

Guest Lecturer, Prisoners Rights, Northwestern University School of Law, American Constitution Society (2010)



Guest Lecturer, “Private – Public Interest Law,” Northwestern University School of Law, Public Interest Law Group and Bluhm Legal Clinic (2010)

Guest Lecturer, “Triaging and Financing Prison Cases,” Yale Law School, Prisoners’ Rights Litigation: A Workshop for Advocates (2010)

Guest Lecturer, “California Prison Overcrowding and the Supreme Court,” Northwestern University School of Law (2009)

Panelist, “Prison Overcrowding Decision,” KQED Forum, San Francisco (2009)

Guest Lecturer, “Prisoner Release Orders and the California Litigation,” George Washington University School of Law, Prison Litigation Conference (2008)

Panelist and Guest Lecturer, Symposium on Prison Crisis, University of San Francisco Law School (2008)

Guest Lecturer, “California Prison Crisis,” Boalt Hall School of Law (2007)

Panelist and Guest Lecturer, “California Prison Overcrowding Crisis,” UCLA School of Law, Prison Class Action Litigation Conference (2007)

Guest Lecturer, “Mental Health in Prisons,” University of California, Berkeley School of Public Health, Advanced Seminar in Community Mental Health (2006, 2007, 2008, 2009)

Panelist, “Back-End Sentencing and Technical Parole Violations,” Stanford Law School (2006)

Guest Lecturer, “Police Misconduct and Institutional Reform Litigation In California,” Lorman Education Services, San Francisco (2005)

Panelist, “Civil Rights Litigation: Overused or Under Siege?”, Northern District of California Judicial Conference (2002)

Instructor in Trial Practice, National Institute of Trial Advocacy, Mid-West Regional at Northwestern University School of Law (1994, 1997, 1998); Mid-West Regional at Loyola University School of Law (2001); Western Regional at Golden Gate Law School (1996, 1997); Western Regional at Boalt Hall School of Law (2000); Deposition Program (2000, 2001)

Panelist, “Prisoner Civil Rights Litigation,” University of California, Berkeley, Critical Resistance Conference (1998)

Co-author, ABA Antitrust Section, Monograph No. 19, *The Noerr-Pennington Doctrine*, ABA, Antitrust Section (1993)

Author, *Litigation as an Antitrust Violation: Conflict Between the First Amendment and the Sherman Act*, 16 U.S.F. L. Rev. 41 (1981)

Panelist, “State-Action Immunity, Recent Developments,” ABA Annual Meeting, Antitrust Section (1990 and 1987)

Panelist, “Part-time Work in Law,” ABA Annual Meeting, Law Practice Management Section (1990)

Author, “Judicial Selection Process,” San Francisco Lawyer Magazine (1989)



Panelist, “Local Government Antitrust Immunity Act, Recent Developments,” ABA Annual Meeting, Antitrust Section (1986)

Instructor, “Trial Practice,” “Motion Practice,” “Antitrust Law,” Brobeck, Phleger & Harrison in-house programs (1985–1990)

COMMUNITY ACTIVITIES

Reentry Council of the City and County of San Francisco (Subcommittee Member, 2009–present)

New Israel Fund (International Council Member, 2011–present, Regional Board Member, 2006–present, Chair, Regional Board, 2011–present)

Congregation Beth Sholom (Rabbi Search Committee, 2007)

Camp Tawonga (Director, 2003–2008)

Religious Witness With Homeless People (Member, Steering Committee, 2003–present)

Jewish Vocational Service (various, 2003–2007)

Brandeis Hillel Day School of San Francisco and Marin (President, 1998–2000; Trustee, 1990–1996, 1998–2002; Head Search Committee, 2005)

Wexner Heritage Foundation (Fellow, 2000–2002)

Jewish Community Federation (Planning & Allocations Committee, Jewish Education Subcommittee, Chair, S.F. Division of Campaign, 1995–2002)

Metropolitan YMCA of San Francisco (Director, 1985–1989)

Mission YMCA (Chairperson, Board of Managers, 1985–1989)

HONORS

Martindale Hubbell AV Rated

The Best Lawyers in America, in Commercial Litigation (2013–2016)

Brandeis University, Alumni Activist Award (with Jane Kahn) (2011)

Leonard E. Weinglass in Defense of Civil Liberties Award, American Association for Justice (2011)

Selected as Northern California “Super Lawyer” in Civil Rights/First Amendment, Business Litigation, Antitrust Litigation (2006, 2008–2016)

Daily Journal’s Top 100 List, “California’s Leading Attorneys” (2010, 2013, 2015)

California Lawyer Magazine, California Lawyer of the Year (“CLAY”) Award for Constitutional Law (2010)

Northwestern University School of Law, Student Funded Public Interest Fellowships, Public Service Award (2010)

The Recorder Attorneys of the Year, (2009)



Honored for work on California parole revocation reform, California Public Defender Association (2005)

Outstanding Mental Health Advocate, California Coalition for Mental Health (2003)

Lion of Judah Award, Brandeis Hillel Day School (2000)

Honoree, California Attorneys for Criminal Justice (1994)

Fellow, American Bar Foundation (1988)

Volunteer of the Year, Mission YMCA (1988)

Pro Bono Award, State Bar of California (1985)

Center for Urban Affairs Fellowship, Northwestern University (1979)

AREAS OF SPECIALTY

Antitrust Litigation and Counseling
Trade Practices
Trade Secrets
Intellectual Property
Class Actions
Attorneys' Fees
Securities Litigation
Internet Law

Real Property Litigation
Complex Litigation
Commercial Litigation
Disabilities Law
Mental Health Law
Civil Rights
Prisoner Rights

REPRESENTATIVE CLIENTS

Aerosafe, Inc.
Computer Education Managers Assn.
Estee Lauder, Inc.
Nextcard, Inc.

Primark Benefits
Pfizer Inc.
Trans Union

EXHIBIT B

NFB v. UBER TECHNOLOGIES, INC., No. 3:14-cv-04085-NC (N.D. Cal.)
RBGG MERITS TIME --FIRM SUMMARY -- AS OF SEPT. 9, 2016

TIMEKEEPER	RATE	HOURS	ACTUAL AMOUNT	BILLING JMT HOURS	BILLING JMT AMOUNTS	CLAIMED HOURS	CLAIMED AMOUNT	% OF HOURS DEDUCTED
RBGG								
PARTNER								
Bien, Michael	\$900	143.8	\$129,330.00	4.3	\$3,870.00	139.5	\$125,550.00	3.0%
Ells, Lisa	\$600	1.7	\$1,020.00	1.7	\$1,020.00	0.0	\$0.00	100.0%
Galvan, Ernest	\$740	0.9	\$666.00	0.9	\$666.00	0.0	\$0.00	100.0%
Grunfeld, Gay	\$790	0.2	\$158.00	0.2	\$158.00	0.0	\$0.00	100.0%
ATTORNEY								
Fischer, Aaron	\$575	0.3	\$172.50	0.3	\$172.50	0.0	\$0.00	100.0%
Nunez, Michael (RBGG)	\$460	562.0	\$257,554.00	45.6	\$20,976.00	516.4	\$237,544.00	8.1%
Stone Manista, Krista	\$490	7.4	\$3,626.00	7.4	\$3,626.00	0.0	\$0.00	100.0%
LAW STUDENT								
Monek Anderson, Eric	\$275	19.4	\$5,335.00	0.8	\$220.00	18.6	\$5,115.00	4.1%
PARALEGAL								
Gonzales, Greg	\$275	123.5	\$33,962.50	65.2	\$17,930.00	58.3	\$16,032.50	52.8%
LaPurja, Gail	\$275	2.9	\$797.50	2.9	\$797.50	0.0	\$0.00	100.0%
Stilber, Karen	\$300	10.2	\$3,060.00	1.1	\$330.00	9.1	\$2,730.00	10.8%
TOTAL		872.3	\$435,681.50	130.4	\$49,766.00	741.9	\$386,971.50	14.9%



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Michael W. Bien
Email: mbien@rbgg.com

National Federation of the Blind

September 19, 2016
Client: 001318
Matter: 000001
Invoice #: 15392
Resp. Atty: MWB
Page: 1

RE: Natl. Federation of the Blind of Calif. v. Uber

For Professional Services Rendered Through September 09, 2016

ACCOUNT SUMMARY

Matter	Description	Fees	Expenses	Discount	Total Due
000001	Natl. Federation of the Blind of Calif. v. Uber	\$437,010.00	\$1,184.35	(\$50,038.50)	\$388,155.85
		AMOUNT DUE			\$388,155.85

Courtesy Discount is 11.45 %
of "gross" hours worked

Previous retainer account balance \$0.00
Net change to retainer account (\$0.00)
Retainer account balance \$0.00



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National Federation of the Blind

September 19, 2016
Client: 001318
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Page: 1

RE: Natl. Federation of the Blind of Calif. v. Uber

For Professional Services Rendered Through September 09, 2016

SERVICES

Date	Person	Description of Services	Hours	Discount
4/20/2015	LAE	(No Charge) review m2d order, confs and emails with MN re same.	0.0	0.8
4/20/2015	MWB	(No Charge) Conference with MN re co-counsel agreement, retainers and set-up.	0.0	0.2
4/21/2015	MWB	(No Charge) Conference with MN re co-counsel agreement and press release.	0.0	0.3
4/21/2015	MWB	(No Charge) Review retainer agreements and email with MN.	0.0	0.3
4/21/2015	GZG	(No Charge) Meeting w/MN re case background & paralegal tasks; emails to co-counsel.	0.0	0.2
4/22/2015	MWB	Conference with MN re Uber projects, joint inspections, strategy.	0.5	
4/22/2015	MWB	(No Charge) Review and execute co-counsel agreement.	0.0	0.2
4/22/2015	MSN	Meet with M. Bien re updating retainer agreement with clients, joint inspection, initial disclosures, and other upcoming dates.	0.2	
4/22/2015	GZG	(No Charge) Print out co-counsel agreement for MWB signature; save to database.	0.0	0.1
4/23/2015	MWB	Emails re GO 56 letter and meeting.	0.5	
4/23/2015	MSN	(No Charge) Review sample RBGG retainer agreements,, original DRA retainer agreement, and draft and revise amended retainer agreement.	0.0	2.5
4/23/2015	GZG	(No Charge) Draft Notice of Change of Address & Firm for MN.	0.0	0.5

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SERVICES

Date	Person	Description of Services	Hours	Discount
4/23/2015	GZG	(No Charge) Saved docs to database.	0.0	3.0
4/24/2015	MWB	(No Charge) Review and revise MN draft amendment to retainer agreement.	0.0	0.2
4/24/2015	MWB	Conference with MN re strategy.	0.2	
4/24/2015	MWB	Emails MN-AZ re strategy, meeting with Uber.	0.3	
4/24/2015	MSN	Confer with M. Bien re next steps in Uber litigation.	0.2	
4/24/2015	MSN	(No Charge) Review updated version of amended retainer agreement from word processing.	0.0	0.2
4/24/2015	MSN	Draft emails to T. Elder, co-counsel, re press coverage of Uber accessibility issues.	0.2	
4/24/2015	GZG	(No Charge) Draft Notice of Appearance of Counsel for MWB; email MN.	0.0	0.5
4/24/2015	GZG	(No Charge) Saved docs to database; emailed co-counsel & MN re same.	0.0	0.2
4/27/2015	MWB	Telephone conferences and emails re initial disclosures, meeting with Defendants.	0.3	
4/27/2015	MSN	Call with T. Elder concerning schedule for joint inspection, outstanding action items, and amended retainer agreements.	0.2	
4/27/2015	GZG	(No Charge) Saved docs to database.	0.0	1.0
4/28/2015	MWB	(No Charge) Emails re retainer agreement and conference with MN.	0.0	0.2
4/28/2015	MWB	Conference with MM and emails re initial disclosures, prep for Uber meeting.	0.5	
4/28/2015	MWB	Review draft initial disclosures and emails MN re same.	0.2	
4/28/2015	MSN	Review and revise draft initial disclosures from A. Zisser.	0.6	
4/28/2015	MSN	(No Charge) Confer with M. Bien re status of amended letter agreements and upcoming deadlines.	0.0	0.2
4/28/2015	MSN	(No Charge) Call with A. Zisser of DRA re various action items, division of labor, and next steps.	0.0	0.1
4/28/2015	MSN	(No Charge) Call with plaintiff Hingson concerning amended retainer agreement letter.	0.0	0.2
4/28/2015	MSN	(No Charge) Draft amended retainer agreement letters for Plaintiffs Hingson, Pedersen, and Kelly.	0.0	1.0
4/28/2015	MSN	Review and revise draft GO 56 settlement letter, and send to M. Bien for review.	0.8	

September 19, 2016
 Client: 001318
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SERVICES

Date	Person	Description of Services	Hours	Discount
4/28/2015	MSN	(No Charge) Review revised amended retainer agreement letters from Word Processing, and draft emails to three individual Plaintiffs concerning the amended retainer letters.	0.0	0.7
4/28/2015	GZG	(No Charge) Download docs from co-counsel to database.	0.0	3.5
4/29/2015	MWB	Emails MN-AZ re initial disclosures, meeting.	0.2	
4/29/2015	MWB	(No Charge) Conference with MN.	0.0	0.1
4/29/2015	MWB	Review letter to Uber.	0.1	
4/29/2015	MSN	Review and analyze settlement proposal framework, review relevant case documents, and revise and analyze settlement framework.	1.8	
4/29/2015	MSN	Draft email to M. Bien concerning settlement framework and my revisions to same.	0.1	
4/29/2015	MSN	Draft email to legal team concerning RBGG edits to GO 56 letter.	0.1	
4/29/2015	MSN	Review emails from legal team re questions and concerns re initial disclosures, review draft initial disclosures, and draft responses to emails.	0.4	
4/29/2015	MSN	(No Charge) Review local rules re notice of appearance of counsel, and review draft notice of appearance of M. Bien drafted by paralegal.	0.0	0.3
4/29/2015	MSN	(No Charge) Provide paralegal with instructions concerning filing notice of appearance and notice of change of firm and change of address.	0.0	0.2
4/29/2015	GZG	(No Charge) Saved pleadings from Pacer to database.	0.0	1.5
4/29/2015	GZG	(No Charge) Review ECF site on how to e-File Court docs at CA ND website.	0.0	0.2
4/30/2015	MSN	(No Charge) Email to potential client concerning retainer agreement.	0.0	0.1
4/30/2015	MSN	(No Charge) Review to-do list, and prepare for next steps.	0.0	0.1
4/30/2015	MSN	(No Charge) Prepare for intake training with Greg.	0.0	0.2
4/30/2015	MSN	(No Charge) Conduct intake training with paralegal Greg.	0.0	0.8
4/30/2015	MSN	(No Charge) Draft emails to legal team concerning publication of order denying MTD.	0.0	0.2
4/30/2015	MSN	Review case facts and begin drafting internal questions for upcoming joint inspection.	0.6	

September 19, 2016
 Client: 001318
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SERVICES

Date	Person	Description of Services	Hours	Discount
4/30/2015	MSN	Draft emails to legal team re initial disclosures.	0.2	
4/30/2015	MSN	Call with co-counsel concerning initial disclosures.	0.2	
4/30/2015	GZG	(No Charge) Meeting w/MN re intake training.	0.0	0.8
4/30/2015	GZG	(No Charge) Reviewed intake form & intakes to prepare for training.	0.0	0.3
5/1/2015	MWB	(No Charge) Telephone conferences and emails re retainer, initial appearance, initial disclosures.	0.0	0.3
5/1/2015	MWB	Brief review of Uber initial disclosures and Answer.	0.3	
5/1/2015	MSN	Continue to draft questions for joint inspection and review.	1.1	
5/1/2015	MSN	Email exchange with co-counsel concerning Uber's answer to complaint, and Uber's initial disclosures.	0.1	
5/1/2015	MSN	Begin to review Uber's Answer and Uber's initial disclosures.	0.2	
5/1/2015	MSN	(No Charge) Review Signed retainer agreement from Plaintiff Pedersen.	0.0	0.1
5/1/2015	MSN	(No Charge) Draft email to M. Bien concerning executed amended retainer agreement filing notice of appearance and notice of change of firm/address.	0.0	0.2
5/1/2015	MSN	(No Charge) Draft two emails to co-counsel and M. Pedersen concerning signed amended retainer agreement.	0.0	0.2
5/1/2015	GZG	(No Charge) Scanned/saved retainer agreement to database.	0.0	0.1
5/3/2015	MSN	Continue to draft questions for joint inspection.	0.3	
5/4/2015	MWB	Emails re Uber meeting prep and strategy.	0.3	
5/4/2015	MSN	Review and respond to emails from legal team re discovery plan and publication of order denying MTD.	0.2	
5/4/2015	MSN	(No Charge) Review local rules concerning filing notice of appearance and notice of change of firm and change of address.	0.0	0.6
5/4/2015	MSN	(No Charge) Review and finalize notice of appearance and notice of change of firm and change of address.	0.0	0.3
5/4/2015	MSN	Call with co-counsel T. Elder re additional fact research re Uber drivers.	0.2	
5/4/2015	MSN	Continue to review Uber case documents and to draft questions for joint site inspection.	1.6	
5/4/2015	MSN	Begin to review Uber's Answer to Plaintiffs' First Amended Complaint.	0.2	

September 19, 2016
 Client: 001318
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SERVICES

Date	Person	Description of Services	Hours	Discount
5/4/2015	MSN	Review Uber's initial disclosures.	0.2	
5/4/2015	MSN	Draft email to M. Bien with question concerning fact research.	0.3	
5/4/2015	MSN	Call with T. Elder again re fact research concerning UberX drivers.	0.1	
5/4/2015	MSN	(No Charge) Leave voicemails for T. Elder concerning fact research re Uber drivers.	0.0	0.1
5/4/2015	MSN	Finish reviewing Defendants' Answer to Plaintiffs' FAC.	0.9	
5/4/2015	MSN	Continue to review and revise draft questions for site inspection.	0.3	
5/4/2015	GZG	(No Charge) Filed notice to appear as counsel for MWB & notice of change of firm/address for MN.	0.0	0.5
5/5/2015	MWB	Prepare for and participate in telephone conference with co-counsel and meeting re prep for Joint Inspection.	1.2	
5/5/2015	MSN	Finish drafting internal questions for joint site inspection.	1.8	
5/5/2015	MSN	(No Charge) Email exchange with co-counsel concerning logistics for conference call.	0.0	0.1
5/5/2015	MSN	Draft email to A. Zisser concerning settlement framework.	0.2	
5/5/2015	MSN	Prepare for joint inspection prep call.	0.1	
5/5/2015	MSN	Participate in joint inspection prep call.	1.3	
5/5/2015	MSN	Review and analyze documents that Uber disclosed with initial disclosures.	2.1	
5/6/2015	LAE	(No Charge) emails re potential press strategy for case.	0.0	0.1
5/6/2015	MWB	Emails co-counsel re Uber inspection and Littler response and strategy.	0.5	
5/6/2015	MSN	Continue to review Uber's initial disclosures.	0.4	
5/6/2015	MSN	Review comments from Aaron on my revisions to the joint settlement framework.	0.2	
5/6/2015	MSN	Finish reviewing documents that Uber produced with its initial disclosures.	0.9	
5/6/2015	MSN	(No Charge) Review order denying MTD, review press articles re order denying MTD, and draft lengthy email to West re publication of order denying MTD.	0.0	2.1
5/6/2015	GZG	(No Charge) Sent sample intake to MN for review; saved docs to database.	0.0	0.1

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SERVICES

Date	Person	Description of Services	Hours	Discount
5/7/2015	MSN	Review intake from G. Gonzalez and provide written feedback re same.	0.4	
5/7/2015	MSN	(No Charge) finalize email to West re publication of order denying MTD.	0.0	0.2
5/7/2015	MSN	(No Charge) Review and respond to email from West re publication of order denying MTD, and email to legal team re same.	0.0	0.1
5/7/2015	GZG	(No Charge) Meeting w/NW to instruct her to pick up potential client at BART station.	0.0	0.1
5/8/2015	MWB	Emails with meeting with Uber.	0.2	
5/8/2015	MSN	Further revise questions for site inspection.	1.0	
5/8/2015	MSN	Attend mediation with opposing counsel.	3.8	
5/11/2015	LAE	(No Charge) conf with MN re strategy.	0.0	0.1
5/11/2015	MSN	Confer with L. Ells concerning joint inspection and next steps re mediation, and meeting with Uber iOS product engineer to review driver materials.	0.1	
5/11/2015	MSN	Begin to draft summary of joint inspection.	0.7	
5/12/2015	MWB	Review MN memo re GO 56 inspection.	0.2	
5/12/2015	MSN	Review and respond to emails from legal team concerning procedure for handling intakes.	0.2	
5/12/2015	MSN	Finish drafting summary of joint inspection and circulate to legal team.	1.7	
5/12/2015	GZG	(No Charge) Uploaded docs provided by co-counsel to database.	0.0	1.5
5/13/2015	MSN	(No Charge) Draft email to legal team concerning pitching news story to KQED.	0.0	0.1
5/13/2015	MSN	(No Charge) Draft email to M. Bien concerning delaying press in light of settlement talks with Uber.	0.0	0.1
5/14/2015	MWB	Emails re mediation and f/u re GO 56 Meeting.	0.5	
5/14/2015	MSN	Review revisions to summary of GO 56 meeting from L. Paradis.	0.3	
5/14/2015	MSN	Call to JAMS re Judge Infante's availability, and draft email to legal team re same.	0.1	
5/14/2015	MSN	Review and respond to emails from legal team re mediation, and drafting settlement agreement.	0.3	

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5/15/2015	MWB	Emails re mediation and strategy.	0.3	
5/15/2015	MSN	Review and respond to legal team concerning mediators.	0.1	
5/15/2015	MSN	Review email re Uber fair adjustments re discrimination, and draft response to legal team re same.	0.1	
5/18/2015	MSN	Plan for call with co-counsel concerning intake procedures.	0.1	
5/19/2015	MWB	(No Charge) Telephone conference and conference with MN re mediation and assignments.	0.0	0.3
5/19/2015	MSN	(No Charge) Confer with M. Bien concerning status of case, next steps, adjustments to legal team.	0.0	0.3
5/19/2015	MSN	Call with J. Marks re intake procedures.	0.4	
5/19/2015	MSN	(No Charge) Draft email to M. Hingson re signed amended retainer agreement.	0.0	0.1
5/19/2015	MSN	(No Charge) Draft email to T. Elder re NFBC amended retainer agreement.	0.0	0.1
5/20/2015	MSN	Conduct intake interview with intake caller re denial of rides by Uber drivers.	0.5	
5/21/2015	MSN	(No Charge) Email to M. Hingson re amended retainer agreement.	0.0	0.1
5/21/2015	MSN	Draft summary of new intake's Uber experience,, review documentation emails re complaints and Uber responses, and circulate to legal team along with documentation of complaints and Uber's responses to complaints.	1.0	
5/26/2015	MWB	Emails re mediator and new intake.	0.2	
5/26/2015	MWB	Emails DRA and conference with MN re CMC statement and f/u.	0.5	
5/26/2015	MSN	Draft email to DRA re CMC conference and scheduling stip.	0.1	
5/26/2015	MSN	Confer with M. Bien concerning stipulation re CMC and private ADR.	0.1	
5/26/2015	MSN	Conference call with co-counsel concerning strategy re private ADR and CMC.	0.2	
5/26/2015	MSN	Call with Op. Counsel re scheduling stipulation.	0.1	
5/26/2015	MSN	Review draft stipulation and declaration ISO stipulation re ADR and CMC.	0.3	
5/26/2015	MSN	Draft several emails to legal team concerning scheduling stipulation.	0.2	

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Date	Person	Description of Services	Hours	Discount
5/27/2015	MWB	Emails re CMC statement and Mediator.	1.5	
5/27/2015	MWB	Conference with MN re CMC statement and Mediator.	0.2	
5/27/2015	MSN	Review draft stipulation from Uber, and draft email to legal team re same.	0.2	
5/27/2015	MSN	Call with co-counsel concerning scheduling stipulation.	0.2	
5/27/2015	MSN	Review and revise draft scheduling stipulation and declaration ISO stipulation with TRE edits, and send to op. counsel.	0.5	
5/27/2015	MSN	Draft emails to legal team concerning scheduling stipulation.	0.2	
5/27/2015	MSN	Review Op. counsel edits to scheduling stipulation.	0.2	
5/27/2015	MSN	Review additional edits to declaration ISO stipulation and send to J. Marks.	0.2	
5/27/2015	MSN	Draft emails to co-counsel concerning scheduling meeting with Uber product engineer.	0.2	
5/27/2015	MSN	Draft emails to intake re call re guide dog discrimination issue.	0.2	
5/28/2015	LAE	(No Charge) emails re recent intake refused service due to guide dog.	0.0	0.1
5/28/2015	LAE	(No Charge) review recent 9th cir title 3 case re mootness and voluntary cessation.	0.0	0.1
5/28/2015	MSN	Draft email to Op. Counsel concerning scheduling meeting with Uber product engineer.	0.2	
5/29/2015	MSN	Review and respond to several emails from co-counsel concerning additional intakes re Uber denials of service.	0.5	
5/29/2015	GZG	(No Charge) Scheduled intakes w/2 new Uber callers; emails to MN & co-counsel re scheduling.	0.0	0.4
5/31/2015	GZG	Spoke w/R re Uber experience.	0.4	
5/31/2015	GZG	Edit intake form for new Uber caller.	0.3	
5/31/2015	GZG	(No Charge) Saved docs to database; emailed intake.	0.0	0.3
5/31/2015	GZG	(No Charge) Trained reception re intake process.	0.0	0.2
6/1/2015	MSN	Draft email to legal team concerning meeting with Uber product engineer.	0.1	
6/1/2015	MSN	Intake call with new Uber caller.	0.5	
6/1/2015	MSN	Revise intake form for new Uber caller and send to paralegal with instructions re further revisions.	0.4	

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Date	Person	Description of Services	Hours	Discount
6/1/2015	MSN	Review revisions from paralegal to new Uber caller intake form, and draft email to paralegal re same.	0.1	
6/2/2015	MWB	(No Charge) Review pleading.	0.0	0.1
6/2/2015	MWB	Emails re Uber meeting.	0.2	
6/2/2015	MSN	Draft email to paralegal re intake call.	0.1	
6/2/2015	MSN	Review updated privacy statement re significance for case.	0.3	
6/2/2015	MSN	(No Charge) Draft emails to M. Bien, paralegal, and M. Hingson re signed M. Hingson retainer agreement.	0.0	0.2
6/2/2015	MSN	Draft email to op. counsel re meeting with Uber product engineer.	0.1	
6/2/2015	GZG	(No Charge) Rev'd email re new Uber caller, intake; scheduled call.	0.0	0.3
6/2/2015	GZG	Intake call w/new Uber caller, AD; email to MN re same; circulated intake form to MN & co-counsel.	0.8	
6/2/2015	GZG	(No Charge) Saved Notice of change in counsel pleading to database; updated Docket Sheet; emailed team re same.	0.0	0.2
6/2/2015	GZG	(No Charge) MN signature on Hingson retainer; save to database; emailed MN re same.	0.0	0.1
6/3/2015	MSN	Update calendar re Uber.	0.1	
6/3/2015	MSN	Review intake forms for intake calls conducted by paralegal.	0.2	
6/3/2015	GZG	Emailed SL re intake chart update.	0.1	
6/3/2015	GZG	Updated refusal timeline chart w/ intake info; sent follow-up email to intake; updated Master summaries w/intake info spoke to SL re chart update; updated Total # of refusals w/intake info.	1.0	
6/3/2015	GZG	Updated refusal timeline chart w/2d new intake info; updated Master summaries w/ 2d new intake info spoke to SL re chart update; updated Total # of refusals w intake info; emailed team re update.	1.0	
6/3/2015	GZG	(No Charge) Intake call; edited intake form; saved to database; emailed team.	0.0	1.0
6/3/2015	GZG	Updated intake docs.	0.1	
6/4/2015	MWB	Emails re mediation.	0.2	
6/4/2015	GZG	(No Charge) Reviewed emails from co-counsel re intake docs; saved intake docs for intake to shared file.	0.0	0.6

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Date	Person	Description of Services	Hours	Discount
6/5/2015	MSN	Draft emails to co-counsel concerning availability of clients to participate in mediation and concerning signed amended retainer agreements.	0.1	
6/5/2015	MSN	(No Charge) Draft email to T. Elder concerning NFB of Cal. Amended retainer agreement.	0.0	0.1
6/5/2015	MSN	Review and respond to email from co-counsel re JAMS mediation with Uber in July.	0.1	
6/5/2015	GZG	Completed intake for recent Uber called; emailed team re same.	0.1	
6/8/2015	MWB	Emails re mediation.	0.2	
6/8/2015	MSN	Review and respond to emails from legal team concerning arranging mediation and client participation in mediation.	0.2	
6/8/2015	GZG	Emails to intake caller & MN re new intake.	0.1	
6/8/2015	GZG	Emails with MN re referral intake.	0.2	
6/8/2015	GZG	Reviewed emails re intakes.	0.1	
6/8/2015	GZG	(No Charge) Upload intake documentation provided intakes via co-counsel to sharefile.	0.0	0.3
6/8/2015	GZG	Updated & completed intake documents for re Uber caller, emailed team re same.	0.5	
6/8/2015	GZG	Emails to co-counsel re intake call for new Uber caller.	0.1	
6/9/2015	MSN	Review and respond to emails from legal team concerning arranging mediation.	0.1	
6/9/2015	MSN	Review intake summaries from paralegals, and draft emails to legal team re same.	0.2	
6/9/2015	MSN	Review and respond to intake from new Uber caller.	0.1	
6/9/2015	GZG	(No Charge) Reviewed emails re intake of new Uber caller; emailed caller to schedule intake appointment.	0.0	0.2
6/9/2015	GZG	Intake call; edited intake form; circulated to team w/summary; forwarded intake form to reception to update master intake chart; sent follow-up email to intake.	1.0	
6/9/2015	GZG	Reviewed emails & intake chart re upcoming intake interview for new Uber caller.	0.1	
6/10/2015	GZG	(No Charge) Reviewed emails re follow-up intake ; emailed caller re schedule for follow-up intake; reviewed caller's prior intake; updated intake chart.	0.0	0.3

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Date	Person	Description of Services	Hours	Discount
6/11/2015	MSN	Review and respond to emails from legal team concerning intake summaries, following up with recent intake, and billing of intake for cleaning of Uber vehicle.	0.4	
6/11/2015	MSN	(No Charge) Draft email to legal team concerning division of labor and action items.	0.0	0.1
6/11/2015	GZG	Reviewed emails re new intake; Reviewed emails re updated recent Intake.	0.3	
6/11/2015	GZG	Intake call ; edit intake form; email to team re details of intake; 2d Intake call ; edit intake form; email to team re details of intake; send follow-up emails to both intakes.	1.4	
6/11/2015	GZG	Reviewed emails from co-counsel re referral.	0.1	
6/11/2015	GZG	(No Charge) Saved intake documents for 2 recent intakes to database; reviewed emails re 'cleaning fees example'; discussion w/MN re Uber rides history on app; emails to intake re accessing Uber rides history; reviewed news article re Uber & ADA; routed article to team.	0.0	1.0
6/12/2015	MWB	Emails re UBER meeting.	0.2	
6/12/2015	MSN	Draft email to co-counsel concerning Uber PR effort concerning guide dog access.	0.1	
6/12/2015	MSN	Review and respond to emails concerning CMC statement.	0.2	
6/12/2015	GZG	(No Charge) Review email re Michael May speech; follow-up emails by co-counsel re same.	0.0	0.1
6/12/2015	GZG	Additional information for recent Uber intake ; edited intake form; circulated intake form & summary to team; sent follow-up email to intake.	0.7	
6/15/2015	MSN	Call and leave VM for op. counsel concerning meeting with Uber on Thursday, and draft several emails to legal team re logistics of Thursday meeting.	0.3	
6/15/2015	MSN	Draft emails to op. counsel and legal team concerning logistics for meeting with Uber engineer.	0.3	
6/15/2015	GZG	Completed supplemental intake ; emailed team re completion.	0.8	
6/15/2015	GZG	Updated & completed intake documentation for recent intake; emailed team re same.	0.5	
6/15/2015	GZG	(No Charge) Emailed recent intake re follow-up intake call; saved screenshots provided by co-counsel.	0.0	0.2
6/15/2015	GZG	Updated & completed intake documentation for recent intake, emailed team re same.	0.5	

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6/15/2015	GZG	(No Charge) Saved supporting documentation for recent intake to database.	0.0	0.1
6/16/2015	MWB	Emails re 6/18 meeting and mediation.	0.5	
6/16/2015	MSN	Review and respond to email from J. Marks re supplemental disclosures.	0.1	
6/16/2015	GZG	(No Charge) Supplemental intake call w/ recent intake; edited intake form; emailed team re details of call; emailed SR re update of intake chart; saved supporting documentation provided by recent intake.	0.0	1.2
6/16/2015	GZG	Reviewed emails re recent intake documentation; reviewed email from co-counsel re chart update.	0.1	
6/17/2015	MWB	Emails re supplemental disclosures and strategy.	0.5	
6/17/2015	MWB	Review draft questions re meeting and emails re same.	0.3	
6/17/2015	MSN	Skim draft questions for site inspection, and draft email to J. Marks re same.	0.3	
6/17/2015	MSN	Call with T. Elder concerning meeting with engineer and potential options for relief.	0.2	
6/17/2015	MSN	Review articles re Cal. Labor Commission ruling treating Uber driver as employee, review Commission opinion, and draft emails to legal team re same.	0.5	
6/18/2015	MWB	Prepare for and attend meeting with Uber and conference with co-counsel.	2.5	
6/18/2015	MSN	Review contract from mediator, and confer with paralegal re same.	0.3	
6/18/2015	MSN	Draft emails and call intakes re disclosure of experiences in litigation.	0.2	
6/18/2015	MSN	Attend meeting to inspect Uber driver on-boarding process, driver app, and other materials available to driver (.2 travel).	3.5	
6/18/2015	GZG	(No Charge) Saved example pleadings & agreements to database.	0.0	0.1
6/18/2015	GZG	Emails to co-counsel re update of intake chart.	0.2	
6/18/2015	GZG	(No Charge) Reviewed mediation agreement; emailed MN re same.	0.0	0.1
6/19/2015	MSN	Research restrictions on charging individuals with service animals for cleaning fees under the ADA.	2.6	

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Date	Person	Description of Services	Hours	Discount
6/19/2015	MSN	Draft memo concerning cleaning fees for damage from service animals under the ADA and circulate to legal team.	1.4	
6/20/2015	MWB	Emails with LP re master summary and JAMS agreement.	0.2	
6/20/2015	MWB	Review MN memo re UBER cleaning policy.	0.1	
6/20/2015	MWB	Emails with LP re master summary and JAMS agreement.	0.2	
6/20/2015	MWB	Review MN memo re Uber cleaning policy.	0.1	
6/21/2015	MWB	Emails with LP-TE re mediation and class action strategy.	0.2	
6/22/2015	LAE	(No Charge) update from MN on recent meeting and mediation strategy and timing.	0.0	0.1
6/22/2015	MSN	Draft email to Uber legal team concerning intake disclosure of discriminatory experience in litigation.	0.1	
6/23/2015	GZG	Updated documentation for recent intake; emailed recent intake re documentation; updated documentatio for intake; completed intake; emailed team re completion of intake.	1.1	
6/23/2015	GZG	(No Charge) Saved documentation for recent intae to shared file; updated intake documentation for intake; edited Master Intake Summaries for new intake.	0.0	0.5
6/25/2015	GZG	(No Charge) Saved mediation correspondence to database.	0.0	0.1
6/28/2015	MWB	(No Charge) Email MN re signed retainer agreement.	0.0	0.1
6/29/2015	MWB	Review letter re mediation.	0.1	
6/30/2015	GZG	(No Charge) Received MWB signature for Willows agreement for employment of counsel; saved agreement & JAMS mediation confirmation to database.	0.0	0.1
7/2/2015	MSN	Plan for CMC and CMC statement.	0.3	
7/2/2015	GZG	(No Charge) Reviewed Uber article claiming drivers are not contractors; saved article to database; emailed MN re same.	0.0	0.2
7/2/2015	GZG	Reviewed intake emails.	0.1	
7/3/2015	MWB	Review draft CMC statement and emails re same.	0.5	
7/6/2015	MWB	Emails TE re canceled ride and strategy.	0.2	
7/6/2015	MWB	Conference with MN re CMC, mediation and strategy.	0.3	
7/6/2015	GZG	(No Charge) Reviewed emails re keeping track of class member issues; saved multiple intake documents for AD; saved email threads for FF; emailed TH, FF, & CF re interview appointment time; organized shared folder.	0.0	1.3

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Date	Person	Description of Services	Hours	Discount
7/8/2015	MSN	Review and respond to emails re intakes.	0.3	
7/8/2015	GZG	(No Charge) Scheduled intake for TH.	0.0	0.1
7/9/2015	MSN	Review case notes, summary of June 18 meeting with Uber engineer, and draft email to Uber concerning meet and confer for CMC and re additional materials for upcoming mediation.	0.6	
7/10/2015	MWB	Emails re CMC.	0.5	
7/10/2015	MWB	Review draft supplemental disclosures.	0.3	
7/10/2015	GZG	(No Charge) Prepared for intake w/TH; Intake phone call w/TH; edited intake form for TH saved intake form to shared file; sent follow-up email to TH sent intake form to reception to update intake chart.	0.0	1.0
7/10/2015	GZG	Prepare for intake w/CF; attempted to contact intake; discussion w/reception re intake call-back.	0.3	
7/10/2015	GZG	Prepared for intake w/FF; tried calling intake (no response).	0.4	
7/10/2015	GZG	(No Charge) Intake phone call w/FF; edited intake form for FF saved intake form to shared file; sent follow-up email to FF sent intake form to reception to update intake chart.	0.0	0.7
7/10/2015	GZG	Reviewed database list of intakes to make sure list of names on list of parties interested is complete; email to MN re same.	0.2	
7/13/2015	MWB	Emails re CMC and supplemental disclosure.	0.5	
7/13/2015	MSN	Review Uber's Opp. To Class Certification from O'Conner to identify facts relevant to our case.	0.7	
7/13/2015	MSN	Review and revise draft CMC.	1.8	
7/13/2015	MSN	(No Charge) Begin to review guidance concerning discovery plans.	0.0	0.2
7/13/2015	GZG	(No Charge) Saved documents to database.	0.0	0.1
7/14/2015	LAE	(No Charge) conf with MN re Rule 26 conf and CMC statement, emails re same.	0.0	0.2
7/14/2015	MWB	Emails re CMC and supplemental disclosure.	0.2	
7/14/2015	MWB	Conference with MN re CMC and strategy.	0.5	
7/14/2015	MSN	(No Charge) Begin to review and comment on discovery plan notes.	0.0	0.6
7/14/2015	MSN	Research ADA statute of limitations for time periods in discovery.	0.3	

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Date	Person	Description of Services	Hours	Discount
7/14/2015	MSN	Review outline of evidence desired in discovery, and revise same.	1.5	
7/14/2015	MSN	Continue to revise Draft CMC statement.	0.7	
7/14/2015	MSN	Confer with M. Bien concerning mediation statement, CMC, and discovery strategy.	0.4	
7/14/2015	MSN	Finish revising CMC statement, and email to legal team for review.	1.8	
7/15/2015	MSN	Review edits from Paradis to draft CMC statement.	0.2	
7/15/2015	MSN	Prep call with T. Elder concerning Rule 26(f) meet and confer.	0.8	
7/15/2015	MSN	Review FRCP 26(f), review discovery plan notes, review Defendants' initial disclosures, draft outline for Rule 26(f) meet and confer, and circulate outline to legal team.	2.4	
7/15/2015	MSN	Rule 26(f) meet and confer with Defendants by phone.	0.5	
7/15/2015	MSN	Conference call with legal team re next steps re CMC, litigation hold, discovery requests, and settlement proposal for mediation.	0.7	
7/15/2015	MSN	Update draft CMC statement re Rule 26(f) call with Uber.	1.0	
7/15/2015	MSN	Continue to update draft CMC statement re Rule 26(f) call with Uber.	1.1	
7/15/2015	MSN	Call with T. Elder concerning press inquiry re CPUC decision issued earlier today.	0.2	
7/15/2015	MSN	Plan to meet with legal team re next steps.	0.1	
7/15/2015	MSN	Draft email to legal team re press inquiry re CPUC ruling re Uber disclosure of info, and call with M. Bien re same.	0.2	
7/15/2015	MSN	Continue to review and revise list of desired discovery requests.	0.2	
7/15/2015	GZG	(No Charge) Saved docs provided by intake FF to database; saved docs for filing to database; saved filed pleadings to database; emails to MN re filings; email to intake CF re re-scheduling of intake call.	0.0	0.7
7/16/2015	KSM	(No Charge) Conference with MN re: e-discovery requests and discovery planning.	0.0	0.4
7/16/2015	MSN	Review and further revise list of desired discovery, and circulate revised list to legal team.	0.8	
7/16/2015	MSN	Review CPUC ALJ decision imposing fines on Uber for failing to disclose accessibility data.	0.5	

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Date	Person	Description of Services	Hours	Discount
7/16/2015	MSN	(No Charge) Confer with K. Manista concerning drafting ESI discovery requests and strategy re ESI requests.	0.0	0.5
7/16/2015	MSN	Email to J. Marks re preparing list of facts Uber admitted in its Answer.	0.1	
7/17/2015	MWB	Emails re revised CMC statement.	0.1	
7/17/2015	MWB	Review emails re several intakes.	0.1	
7/17/2015	MSN	Draft emails to LJ and legal team re intake of LJ re Uber discrimination.	0.1	
7/17/2015	MSN	Review emails from paralegal summarizing several intakes.	0.3	
7/17/2015	MSN	Email to co-counsel re outreach to additional intake who experienced denial of service.	0.1	
7/17/2015	MSN	Begin to outline mediation brief.	1.4	
7/17/2015	MSN	Continue to outline mediation brief.	1.2	
7/17/2015	GZG	Finalized intake of LG emailed team re same.	0.3	
7/17/2015	GZG	Organized intakes; sent follow-up interview request to SS.	0.1	
7/17/2015	GZG	Completed intake for TH; emailed team re same.	0.6	
7/17/2015	GZG	Organized intakes; updated template emails; emailed CF re interview; email co-counsel re new staff.	0.2	
7/17/2015	GZG	Completed intake for FF emailed team re same.	0.9	
7/19/2015	MSN	Begin to draft background section of mediation brief.	1.9	
7/20/2015	MWB	Emails re litigation letter.	0.2	
7/20/2015	MWB	Emails re strategy and employee class action issue.	0.2	
7/20/2015	MSN	Make an initial review and revise to draft letter to Uber re preservation of documents.	0.4	
7/20/2015	MSN	Review plaintiffs' opp to Defs' MTD, and Prepare for draft of transportation legal argument section of mediation brief.	2.6	
7/21/2015	MSN	Review emails from legal team re draft discovery letter and discrimination intake.	0.1	
7/21/2015	MSN	Review and revise updated version of ESI and doc preservation letter, and send to legal team.	1.0	
7/21/2015	MSN	Review additional case law concerning Title III applicability to transportation providers re mediation brief.	1.8	
7/21/2015	MSN	Continue to review case law re transportation providers covered by Title III of the ADA.	0.3	

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Date	Person	Description of Services	Hours	Discount
7/21/2015	MSN	Rework and expand ADA transportation argument section of mediation brief.	2.2	
7/21/2015	GZG	(No Charge) Downloaded intake documents for SS emails to SS re interview time; sent outreach email to TH re her friend; reviewed emails re LJ intake.	0.0	1.0
7/21/2015	GZG	Review email re edits to ltr to Defs; discussion w/WP re same.	0.1	
7/21/2015	GZG	Prepared for intake calls of DS & CF, intake calls for both; edited intake forms for both; emails to reception re same.	2.0	
7/22/2015	MSN	Review minor revisions to CMC Statement, and draft email to J. Marks re same.	0.1	
7/22/2015	MSN	Continue to draft the desired relief section of mediation brief.	0.8	
7/22/2015	MSN	Draft relief demands portion of mediation brief.	2.7	
7/22/2015	MSN	Review and revise demanded relief section of brief, and revise introduction section of mediation brief.	1.8	
7/22/2015	GZG	(No Charge) Saved intake documentation for LJ, compared documentation to documentation already on our database for Johnson; saved DRA ltr to Defs re ESI.	0.0	0.2
7/22/2015	GZG	Completed intake of CF; updated all intake docs & charts; emailed team re same.	0.7	
7/22/2015	GZG	(No Charge) Downloaded docs for DS intake: updated charts and docs for intake; emailed team re same.	0.0	0.8
7/22/2015	GZG	Emails w/MN re update of Disclosures Statement; research re same.	0.2	
7/22/2015	GZG	(No Charge) Updated tracking charts for AD saved intake documents to shared file; emailed co-counsel re same.	0.0	0.3
7/22/2015	GZG	(No Charge) Saved supporting docs to shared file for AE updated tracking docs and charts for AE emailed co-counsel re same.	0.0	0.3
7/23/2015	MSN	Review factual records re denials of service and correspondence with legal team re revisions to facts section of mediation brief.	1.0	
7/23/2015	MSN	Continue to review case records re factual background of mediation brief.	1.0	
7/23/2015	MSN	Continue to draft facts section of Uber mediation brief.	2.6	
7/23/2015	MSN	Continue to draft facts section of brief.	0.8	
7/23/2015	MSN	Revise several sections in mediation brief.	1.6	

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7/24/2015	MSN	Draft additional subsections of relief request portion of mediation brief and legal research re same, and further revise introduction of mediation brief.	2.4	
7/24/2015	MSN	Review and respond to inquiry from client Hingson re religious objections.	0.3	
7/24/2015	MSN	Further revise legal argument section of mediation brief and add in missing citations to legal authority and to docket.	1.8	
7/24/2015	MSN	Email to legal team re draft mediation brief.	0.1	
7/24/2015	GZG	Updated intake chart & supporting docs for intake AE.	0.3	
7/24/2015	GZG	Reviewed master chart of intakes to get total numbers for MN; emailed MN re same.	0.3	
7/26/2015	MSN	Review and revise draft mediation brief.	2.8	
7/27/2015	MWB	Emails re mediation.	0.2	
7/27/2015	MSN	Finish reviewing and revising draft mediation brief, and circulate to legal team.	3.7	
7/27/2015	MSN	Email J. Marks re possible revisions to mediation brief.	0.1	
7/28/2015	MSN	Review materials and revise list of desired documents, Rogs, and RFAs.	2.5	
7/28/2015	MSN	Draft emails to LJ re discrimination from UberX driver.	0.2	
7/29/2015	MSN	Review Defendants' revisions to draft CMC, and email form J. Marks re same.	0.5	
7/29/2015	MSN	Call with J. Marks re Defendants' edits to CMC and additional revisions to CMC.	0.2	
7/29/2015	MSN	Further review and revise updated draft of CMC statement.	0.3	
7/29/2015	MSN	Review and further revise preliminary list of RFAs, RFPs, and Rogs.	2.5	
7/29/2015	MSN	Review and revise further updated draft of joint CMC statement.	0.2	
7/30/2015	MWB	Review CMC order and emails re same.	0.2	
7/30/2015	MSN	Further revise list of desired discovery, and organize by claim.	3.6	
7/30/2015	MSN	Confer with A. Fischer re strategy re structure of desired discovery.	0.1	
7/30/2015	MSN	Finish revising list of desired discovery, and draft email to Word Processing re same.	0.8	

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7/30/2015	MSN	Review order continuing CMC and opening discovery, and draft email to legal team re same.	0.2	
7/30/2015	MSN	Review revised discovery list documents, and circulate to legal team.	0.4	
7/30/2015	MSN	Call with co-counsel re drafting initial round of discovery requests.	0.2	
7/30/2015	MSN	Review and respond to emails from legal team re litigation schedule and mediation brief.	0.2	
7/30/2015	MSN	Draft email to co-counsel re propounding Rogs.	0.1	
7/30/2015	GZG	(No Charge) Downloaded Joint Case Mgmt Statement to database; emailed team re same; saved docket sheet to database; saved supporting documentation from LJ emailed intake DT to schedule phone interview; reviewed emails re pending intakes.	0.0	0.4
7/30/2015	GZG	(No Charge) Reviewed Scheduling Order - Docket 51; saved to database; emailed team re same.	0.0	0.2
7/31/2015	MSN	Call with co-counsel re status of revisions to mediation brief.	0.1	
7/31/2015	MSN	Review revisions to mediation brief.	0.5	
7/31/2015	MSN	Call form co-counsel re revisions to draft mediation brief.	0.1	
7/31/2015	MSN	Draft emails to legal team re press inquiries.	0.1	
7/31/2015	MSN	Draft email to co-counsel re drafting discovery requests.	0.1	
7/31/2015	GZG	(No Charge) Saved Structured Negotiations Agreement to database; emailed MN re same.	0.0	0.1
8/1/2015	MWB	Emails Team re trial schedule, strategy and mediation.	0.2	
8/1/2015	MSN	Begin to review and further revise draft Uber mediation brief.	1.5	
8/1/2015	MSN	Continue to review and revise draft mediation brief re comments and revisions from legal team.	1.5	
8/2/2015	MSN	Continue to revise and shorten mediation brief.	0.5	
8/2/2015	MSN	Further revise mediation brief, and send to J. Marks for additional edits.	0.5	
8/3/2015	MWB	Conference with MN and emails co-counsel re mediation brief and strategy.	0.5	
8/3/2015	MSN	Review and finalize mediation brief, work with paralegals to prepare exhibits, and oversee transmission of brief by email and FedEx to mediator.	5.0	

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8/3/2015	FGL	(No Charge) Create, format, and revise TOC and TOA for mediation brief (2.0); further revisions per M. Nunes and co-counsel and finalize same (.2); prepare and take mediator's copy to Federal Express office (.3).	0.0	2.5
8/3/2015	GZG	(No Charge) Gathered exhibits for mediation brief for MN; discussion & emails w/MN re same.	0.0	0.6
8/3/2015	GZG	(No Charge) Drafted cover letter to JAMS; prepared FedEx envelope for mediation brief.	0.0	0.3
8/4/2015	MWB	Emails re mediation and strategy.	0.5	
8/4/2015	MSN	(No Charge) Forward emails to legal team concerning mediation brief.	0.0	0.2
8/4/2015	MSN	(No Charge) Update M. Bien concerning mediation brief and mediation.	0.0	0.1
8/5/2015	MWB	Emails re prep for mediation.	0.3	
8/5/2015	MSN	Review and respond to emails from legal team concerning attorneys' fees for mediation, and settlement in Ramos case.	0.2	
8/5/2015	MSN	Email to Op. Counsel re Defs' mediation brief.	0.1	
8/6/2015	MWB	Prepare for mediation.	0.3	
8/7/2015	MWB	Telephone conference with co-counsel and clients to prepare for mediation.	1.0	
8/7/2015	MSN	Prepare for call with mediator.	0.2	
8/7/2015	MSN	Call with mediator.	0.3	
8/7/2015	MSN	Mediation strategy call with legal team.	0.5	
8/7/2015	MSN	Prepare for mediation prep call with legal team, and hold call re same.	1.0	
8/7/2015	GZG	Read article on Uber Class Action Certification case; routed copy to MN.	0.1	
8/7/2015	GZG	Prepare for intake call w/ DC intake call; edit intake form; email receipt re master intake chart; discussion w/SL re updating charts.	0.8	
8/8/2015	MSN	Review and respond to emails re mediation.i.	0.1	
8/9/2015	MSN	Prepare materials for mediation.	0.2	
8/10/2015	MWB	Prepare for and attend Mediation.	7.0	
8/10/2015	MSN	Attend mediation.	6.5	

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Date	Person	Description of Services	Hours	Discount
8/10/2015	MSN	Confer with M. Bien re yesterday's mediation and next steps.	0.1	
8/11/2015	MWB	Conference with MN re negotiations and strategy.	0.2	
8/12/2015	GCG	(No Charge) Conf w/ MWB re mediation.	0.0	0.2
8/12/2015	MWB	Emails re CMC statement.	0.2	
8/12/2015	MSN	Review and respond to emails from legal team, and review CMC statement, and draft email to team re same.	0.3	
8/12/2015	GZG	(No Charge) Saved Docket #52 to database; emailed team re same.	0.0	0.1
8/13/2015	GZG	(No Charge) Saved intake documentation for intake LI to shared file; saved Docket 53 to database; emailed team re same; completed intake process for DC; summarized experience, emailed team re same; sent interview request to KW.	0.0	0.8
8/14/2015	GZG	Telephone interview w/DT; edited intake form.	0.9	
8/17/2015	MWB	Emails with Team re negotiations and new trial and CMC data.	0.5	
8/17/2015	MSN	Review and respond to emails concerning intakes.	0.1	
8/17/2015	GZG	(No Charge) Emails re calendaring dates per Scheduling Order [Dkt. 053].	0.0	0.2
8/17/2015	GZG	Forwarded ignored interview invitation emails to MN & co-counsel re intake LH completed intake documentation for intake DT summarized intake; emailed team re same.	1.1	
8/17/2015	GZG	Intake of LH.	0.7	
8/17/2015	GZG	Sent interview invitation to intake JN reviewed follow-up emails to intake DT.	0.1	
8/18/2015	GZG	(No Charge) Sent follow-up interview invitation to KW; reviewed emails from team re potential intake; saved all documentation provided by JN to shared file; emailed JN re interview time.	0.0	0.8
8/19/2015	GZG	(No Charge) Scheduled intake interviews for JN & KW, save DT to the shared file; updated tracking charts of information on DT intake.	0.0	0.4
8/20/2015	MSN	Call with M. Bien and T. Elder re revisions to draft settlement agreement.	0.5	
8/21/2015	GZG	Intake w/JJN edited intake form; sent intake form to reception to update tracking charts & graphs; sent follow-up email to JN.	1.6	
8/21/2015	GZG	(No Charge) Saved documentation provided by JN to shared file.	0.0	0.1

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8/21/2015	GZG	(No Charge) Edited LH intake form; saved to shared file.	0.0	0.4
8/21/2015	GZG	Updated tracking charts for intake LH using intake form.	0.3	
8/22/2015	MSN	Begin reviewing and revising draft settlement agreement.	1.2	
8/23/2015	MSN	Finish reviewing and revising this version of draft settlement agreement, and circulate to legal team.	1.8	
8/24/2015	MWB	Conference with MN re draft settlement agreement and strategy.	0.5	
8/24/2015	MWB	Emails MN-Team re draft settlement agreement.	0.2	
8/24/2015	AJF	(No Charge) Gather settlement agreements to assist in drafting structure settlement.	0.0	0.3
8/24/2015	MSN	Confer with M. Bien re revisions to draft settlement agreement.	0.4	
8/24/2015	GZG	Edited intake charts & graphs for LH intake; summarized LH intake; emailed team re same; left VM w/intake KW requesting intake interview.	1.0	
8/24/2015	GZG	Edited intake JN's intake form; started summarizing incidents.	0.6	
8/24/2015	GZG	Continued summarizing incidents for intake JN.	0.6	
8/24/2015	GZG	Completed intake for JN; edited tracking charts & graphs; emailed team re same.	0.3	
8/24/2015	GZG	Reviewed emails re Uber intakes.	0.1	
8/25/2015	MSN	Review language re fees and monitoring in other settlement agreements re revisions to provisions in draft Uber settlement agreement.	2.5	
8/25/2015	GZG	Reviewed emails re updates to intake chart for Plaintiff Mike Kelly; emailed co-counsel re same.	0.3	
8/26/2015	MSN	Finish revisions and additions to draft settlement agreement and circulate to legal team.	3.5	
8/27/2015	GZG	(No Charge) Scheduled intake interview call w/ VF; downloaded all intake documentation for VF to shared folder; emailed team re same; updated intake tracking charts w/info re denial of BR & MK; emailed co-counsel re same.	0.0	0.6
8/28/2015	MSN	Begin to make additional revisions to latest version of draft proposed settlement agreement.	0.7	
8/28/2015	MSN	Finish revisions to current version of draft proposed settlement agreement, and circulate to legal team.	1.6	
8/30/2015	MWB	Emails with Team re draft settlement agreement.	0.2	

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8/31/2015	MWB	Review revised settlement agreement.	0.3	
8/31/2015	MSN	Review and respond to report of Uber discrimination from LJ.	0.2	
8/31/2015	GZG	Reviewed emails provided by intake VF in preparation for intake interview; rescheduled intake interview for Wednesday.	0.5	
9/1/2015	GZG	(No Charge) Emailed intake interview appointment requests to AR, LJ, MD, & RT; downloaded intake documentation related to aforementioned; saved press article re Uber growth to database; reviewed article.	0.0	0.8
9/2/2015	GZG	Intake w/RT.	0.8	
9/2/2015	GZG	Intake w/AR, edited intake form, sent follow-up email requesting documentation.	0.9	
9/2/2015	GZG	(No Charge) Intake w/VF; edited intake form; saved intake form to shared file; sent follow-up email to ; emailed SL re updating charts.	0.0	0.9
9/11/2015	GZG	(No Charge) Saved MD re scheduling.	0.0	0.2
9/14/2015	GZG	Updated tracking charts and intake form for AD to reflect all denials; sent email to schedule intake w/ MD; updated tracking charts and intake form for LI to reflect latest denial; emails to team re same.	1.7	
9/14/2015	GZG	Edited tracking charts to reflect incidents of VF & AR; summarized incidents for both; emailed team re same.	1.3	
9/16/2015	MSN	Exchange emails with legal team concerning Uber's response to proposed settlement agreement, case management statement, and revisions to discovery requests.	0.3	
9/17/2015	GZG	Intake call w/MD; edited intake form; emailed SL re tracking charts.	1.3	
9/21/2015	MWB	Conference with MN and emails with Team re strategy, CMC statement.	0.5	
9/21/2015	MWB	Draft emails to Team re CMC Statement and strategy.	0.5	
9/21/2015	MSN	(No Charge) Work with paralegal re prep of notice of change of counsel's address.	0.0	0.2
9/21/2015	MSN	Calls to T. Elder and DRA re arranging team meeting re next steps in litigation.	0.2	
9/21/2015	MSN	Review previous litigation schedule, and draft possible litigation schedule based on April trial date.	0.5	
9/21/2015	MSN	(No Charge) Confer with M. Bien re holding a call re next steps in litigation, and draft email to legal team re same.	0.0	0.2

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9/21/2015	GZG	(No Charge) Drafted notice of change of address, emailed MN re same; saved discovery to database.	0.0	0.8
9/22/2015	MWB	Telephone conference and emails with co-counsel re CMC, strategy, trial prep.	1.0	
9/22/2015	MSN	Team strategy call re discovery requests, litigation schedule, limitations on discovery.	1.0	
9/22/2015	MSN	Draft updated litigation schedule per team call, and circulate to legal team.	0.2	
9/22/2015	GZG	Completed intake of MD, summarized experiences, emailed team re same; scheduled intake interviews w/2 more intakes.	1.1	
9/23/2015	MWB	Emails re CMC statement.	0.3	
9/23/2015	GZG	(No Charge) Scheduled intake interviews w/3 intakes; emailed intake callers.	0.0	0.4
9/23/2015	GZG	Reviewed emails re LJ supplemental intake; called LJ for intake questions but no answer.	0.2	
9/23/2015	GZG	Intake call w/MG, edited intake chart, updated tracking charts re same; Intake call w/AB, edited intake chart, emailed team re same.	2.0	
9/24/2015	MWB	Review Court Order setting dates.	0.5	
9/24/2015	MWB	Conference with MN re discovery, strategy.	0.3	
9/24/2015	GZG	(No Charge) Saved intake documentation for MG to database; completed intake tracking for same; summarized intake, emailed team re same.	0.0	0.5
9/24/2015	GZG	(No Charge) Saved press articles and filed pleadings to database; emailed MN re same.	0.0	0.2
9/24/2015	GZG	(No Charge) Filed Notice of Change of Address w/court; emailed team re same; saved copy of filed doc on our database.	0.0	0.4
9/25/2015	MSN	Begin to revise draft RFAs.	0.5	
9/26/2015	MSN	Review and revise draft Uber RFAs and 30(b)(6) notice.	0.9	
9/27/2015	MSN	Review and revise draft RFAs, Rogs, RFPs.	2.8	
9/27/2015	MSN	Finalize revisions to first set of discovery requests to Uber.	0.7	
9/28/2015	MWB	Emails Team and conferences with MN re Uber response to settlement offer and potential class.	0.5	

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9/28/2015	MWB	Telephone conference with MN, TE, LP and JM re Uber response, claims and strategy.	1.1	
9/28/2015	MSN	Review and respond to email from T. Elder concerning oral response to proposed settlement from Uber.	0.3	
9/28/2015	MSN	Prepare for strategy call with legal team and hold strategy call.	1.4	
9/29/2015	MSN	Review emails from legal team concerning research of waiver of arbitration clause in contract, and research issue in Westlaw re same, and emails to J. Marks and T. Elder re same.	0.5	
9/29/2015	MSN	Review and respond to inquiries re intake charts from co-counsel (by email).	0.1	
9/30/2015	MWB	Review emails re TE-Defendants' communications.	0.3	
9/30/2015	MSN	Review and revise draft Rogs, RFAs, and RFPs.	1.8	
9/30/2015	MSN	Call with T. Elder re revisions to draft discovery requests.	0.1	
9/30/2015	MSN	Review updated depo notice.	0.2	
9/30/2015	MSN	Call with Elder and Marks re revisions to draft rogs.	0.9	
9/30/2015	GZG	Made edits to tracking chart; emailed team re same.	1.3	
10/1/2015	MSN	Review finalized versions of discovery requests served on defendants.	0.2	
10/1/2015	FGL	(No Charge) Organize discovery docs for MSN on DM (.2).	0.0	0.2
10/1/2015	GZG	(No Charge) Saved docs to database, emailed MN re same; closed out intake of RT.	0.0	0.2
10/5/2015	MWB	Emails re Uber delay in response.	0.2	
10/5/2015	MSN	Draft emails to co-counsel re next steps.	0.2	
10/6/2015	MWB	Conference with MN re status and strategy.	0.3	
10/6/2015	GZG	Calendared dates for discovery and CMC.	0.3	
10/7/2015	MSN	Provide comments to legal team concerning Op. Counsel's documents.	0.2	
10/7/2015	GZG	Research re US markets for Uber; compiled list and routed to team.	0.8	
10/8/2015	MWB	Emails re Uber settlement proposal.	0.3	
10/8/2015	MSN	(No Charge) Review and respond to emails re arranging times to speak with clients re Uber class rep status.	0.0	0.2

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10/8/2015	MSN	Review and comment on draft response to Uber re licensing agreement language, deposition schedules, and settlement agreement.	0.2	
10/13/2015	MWB	Telephone conference with co-counsel re settlement and dates.	0.3	
10/13/2015	MSN	(No Charge) Plan for depositions at RBGG.	0.0	0.1
10/14/2015	MWB	(No Charge) Email MN re client call and amended retainer.	0.0	0.2
10/14/2015	MSN	Call with clients re class rep status for class-based settlement.	1.2	
10/14/2015	MSN	Email to legal team re call with clients and updating retainer agreements for class rep status.	0.1	
10/15/2015	MWB	Review AS email re settlement and discovery.	0.2	
10/15/2015	MWB	Emails re 30(b)(6) depo.	0.1	
10/16/2015	MSN	(No Charge) Begin to draft amended class action retainer agreement.	0.0	0.5
10/16/2015	GZG	(No Charge) Saved Discovery noticed to database; emailed intake re intake call.	0.0	0.2
10/16/2015	GZG	(No Charge) Edits to Hingson retainer agreement, email to MN re same.	0.0	0.1
10/19/2015	MWB	(No Charge) Review and revise draft amended retainer agreement and emails MN.	0.0	0.3
10/19/2015	MSN	(No Charge) Finish drafting amended class action retainer agreement, and circulate to legal team for review.	0.0	3.0
10/19/2015	MSN	Review emails re settlement and additional intakes.	0.2	
10/20/2015	MSN	(No Charge) Prepare logistics for deposition, and email to legal team re same.	0.0	0.1
10/20/2015	MSN	Call with LG re her denials of service and re follow up call from Uber.	0.1	
10/20/2015	GZG	Emailed SP re intake interview; reviewed emails re new intake protocol.	0.2	
10/21/2015	MSN	(No Charge) Emails to legal team and RBGG associates re 30(b)(6) deposition.	0.0	0.3
10/22/2015	MWB	Conference with MN re depositions and strategy.	0.6	
10/22/2015	MSN	(No Charge) Review and respond to emails from legal team concerning amended class action retainer agreements.	0.0	0.2

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10/22/2015	MSN	(No Charge) Review revisions from co-counsel to amended class action retainer agreements, and prepare amended class action retainer agreements for all clients.	0.0	1.0
10/22/2015	MSN	(No Charge) Meet with M. Bien concerning directions re conducting 30(b)(6) deposition.	0.0	1.1
10/22/2015	MSN	Email to legal team concerning conducting fact witness depositions.	0.2	
10/22/2015	MSN	Begin prep for 30(b)(6) deposition.	1.0	
10/22/2015	GZG	(No Charge) Saved documents to database; emails re deposition calendaring.	0.0	0.2
10/23/2015	MSN	Call with LG re intake from two incidents of denial of service on Monday Oct. 19.	0.2	
10/23/2015	MSN	(No Charge) Locate and identify deposition guidance materials re prep for 30(b)(6) deposition.	0.0	0.2
10/23/2015	MSN	Review updated deposition notices from word processing, and circulate to legal team.	0.4	
10/23/2015	MSN	Draft lengthy email to legal team concerning discovery strategy re Uber driver portal and Uber driver app.	0.5	
10/23/2015	MSN	Call with J. Marks re distribution of action items re depositions, case management statement, and notice of inspection.	0.3	
10/23/2015	MSN	(No Charge) Prepare six deposition notices for fact witnesses and circulate to word processing for formatting.	0.0	1.5
10/23/2015	GZG	(No Charge) Reviewed emails re SP intake; attempted to call for intake call, no answer.	0.0	0.1
10/24/2015	MSN	(No Charge) Prepare for 30(b)(6) deposition by reviewing applicable rules and guidelines.	0.0	1.1
10/25/2015	MSN	Continue to prepare for 30(b)(6) deposition.	2.7	
10/26/2015	MWB	Emails with co-counsel - Uber re settlement negotiations.	0.3	
10/26/2015	MSN	Review draft CMC statement, and email to legal team re same.	0.2	
10/26/2015	MSN	Review email thread between co-counsel and op. Counsel, and draft email to legal team with input re settlement and litigation schedule.	0.5	
10/27/2015	MWB	Emails with co-counsel - Defendants re CMC statement.	0.3	
10/27/2015	MSN	Continue to prepare for 30(b)(6) deposition.	1.0	
10/27/2015	MSN	Confer with T. Elder re strategy and logistics for 30(b)(6) deposition.	0.5	

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10/27/2015	MSN	Review Defs. Edits to scheduling stipulation, finalize, and email op. counsel re same.	0.4	
10/28/2015	MWB	Review CMC statement.	0.1	
10/28/2015	MSN	(No Charge) Send instructions to Greg re filing CMS, and send followi up instructions with correction re filing.	0.0	0.3
10/28/2015	MSN	(No Charge) Email with instructions to paralegal re updating calendar re scheduling order.	0.0	0.1
10/28/2015	GZG	(No Charge) Filed updated joint case management statement w/court; filed corrected version; emailed MN & court clerk re same.	0.0	0.8
10/28/2015	GZG	(No Charge) Saved pleading to database, updated filed pleading folder on database; scheduled new CMC date on office calendar.	0.0	0.3
10/29/2015	MSN	Continue to prepare for 30(b)(6) deposition.	1.3	
10/30/2015	MWB	Review JM re RFI draft.	0.1	
11/2/2015	MWB	Emails LP-MN re Uber depo.	0.2	
11/2/2015	MSN	Review and further revise and comment on draft RFI, and draft email to legal team re same.	0.4	
11/2/2015	MSN	(No Charge) Emails to legal team concerning rescheduling deposition.	0.0	0.2
11/2/2015	MSN	Review resume of potential IO expert, and draft several emails to legal team re same.	0.4	
11/2/2015	MSN	(No Charge) Review and respond to emails from legal team re logistics for deposition.	0.0	0.1
11/2/2015	MSN	Begin to draft deposition script.	3.2	
11/3/2015	MWB	Emails re settlement, 30(B)(6), experts.	0.5	
11/3/2015	MSN	Continue to prepare for 30(b)(6) deposition.	1.0	
11/3/2015	MSN	Call to co-counsel re RFI.	0.1	
11/3/2015	MSN	Review and respond to emails with legal team concerning Defendants' request for discovery response extension.	0.4	
11/3/2015	MSN	Review and respond to emails from legal team re retaining expert and further response to Defendants' discovery dispute.	0.4	
11/3/2015	MSN	Review and respond to emails re responses to discovery requests and additional intakes.	0.2	
11/3/2015	MSN	Continue to prepare for 30(b)(6) deposition.	0.3	

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11/3/2015	GZG	(No Charge) Saved documents to database; sent email requesting intake interview w/FH.	0.0	0.3
11/4/2015	MSN	(No Charge) Review rules re service of depo notices, confer with E. Galvan, and email A. Spurchase re same.	0.0	0.4
11/4/2015	MSN	Continue to draft 30(b)(6) deposition outline.	1.4	
11/4/2015	MSN	(No Charge) Prepare to serve depo notices on Defendants.	0.0	0.3
11/4/2015	MSN	Draft email to legal team re strategy re RFI.	0.4	
11/5/2015	MWB	Conference with MN re discovery dispute.	0.3	
11/5/2015	KSM	(No Charge) Review and respond to MN email re discovery demand.	0.0	0.1
11/5/2015	MSN	Review and respond to several emails from co-counsel re deposition schedule.	0.3	
11/5/2015	MSN	Review email thread for another blind intake who was denied a ride.	0.1	
11/6/2015	MWB	Review MN-Uber email re inspection and discovery.	0.2	
11/6/2015	MSN	Review emails from intakes, and email legal team re same.	0.2	
11/6/2015	MSN	Draft email to Op. counsel re confer re inspection of driver app and website.	0.3	
11/6/2015	MSN	Continue to prepare outline for 30(b)(6) depo.	0.7	
11/6/2015	MSN	Begin to draft meet and confer demand letter re Defs' discovery responses.	0.5	
11/6/2015	GZG	Reviewed emails re intakes fro MD and LS; sent follow-up email to FH requesting phone interview; updated filed pleadings folder on database.	0.5	
11/7/2015	MWB	Emails with LP-MN re Uber depo.	0.1	
11/7/2015	MSN	Prepare for 30(b)(6) deposition.	4.2	
11/8/2015	MSN	Prepare for deposition.	4.3	
11/9/2015	MWB	Emails re Uber discovery.	0.3	
11/9/2015	MSN	Finish drafting meet and confer letter, and email to legal team re same.	0.2	
11/9/2015	MSN	Draft email to legal team re depositions and Defendants' discovery responses, and begin reviewing Defendants responses to Plaintiffs First Set of RFAs.	0.7	

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11/9/2015	GZG	Follow-up emails re intake interviews; Reviewed depo notices; calendared re same.	0.6	
11/10/2015	MWB	Draft email to MN re Uber discovery and strategy.	0.5	
11/10/2015	KSM	(No Charge) Review discovery responses and conference with MN re: discovery issues and how to prepare for meet and confer.	0.0	0.8
11/10/2015	MSN	Draft email to legal team re.	0.1	
11/10/2015	MSN	(No Charge) Confer with K. Stone Manista re reviewing and analyzing Defendants discovery responses.	0.0	0.6
11/10/2015	MSN	Draft email to op. counsel re 30(b)(6) deposition and meet and confer, and circulate to legal team for review.	0.2	
11/10/2015	GZG	(No Charge) Saved documents to database; calendared upcoming meetings; reviewed emails re same.	0.0	0.4
11/11/2015	KSM	(No Charge) Conference with MN re discovery strategy and meet and confer preparation.	0.0	0.3
11/11/2015	MSN	Review and analyze Defendants discovery objections.	2.2	
11/11/2015	MSN	Research Title III statute of limitations.	1.0	
11/11/2015	MSN	(No Charge) Confer with K. Manista concerning strategy re meet and confer and deposition.	0.0	0.3
11/11/2015	GZG	(No Charge) Saved Defs' responses to discovery; organized filed pleadings folder.	0.0	0.4
11/11/2015	GZG	TC re intake interviews of intake & RS; edited intake docs re same.	1.4	
11/12/2015	MWB	Emails and conference call with co-counsel re discovery and strategy.	1.0	
11/12/2015	MWB	Conference with MN re prep for and outcome of meet and confer and f/u.	0.5	
11/12/2015	KSM	(No Charge) Conferences with MN re discovery issues.	0.0	0.4
11/12/2015	KSM	(No Charge) Conference with MN re meet and confer and motions to compel.	0.0	0.4
11/12/2015	MSN	Emails to legal team re supplementing our disclosures and conferring re strategy re meet and confer.	0.2	
11/12/2015	MSN	Begin to review Defendants responses to interrogatories.	0.3	
11/12/2015	MSN	Strategy call with legal team re meet and confer for discovery.	1.0	

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Date	Person	Description of Services	Hours	Discount
11/12/2015	MSN	Confer with M. Bien re strategy for meet and confer re discovery.	0.5	
11/12/2015	MSN	Call with J. Marks re strategy on meet and confer re discovery requests.	0.4	
11/12/2015	MSN	Prepare for meet and confer re Defendants' discovery responses.	1.5	
11/12/2015	MSN	Call with A. Spurchise re settlement and meet and confer re discovery issues.	0.5	
11/12/2015	MSN	Call with Julia re planning for meet and confer re production of documents.	1.0	
11/12/2015	MSN	Call with Andrew re meet and confer re defs' objections to discovery requests.	1.0	
11/12/2015	MSN	Call with J. Marks re next steps re discovery production and letter to Defs re meet and confer re Defs objections.	0.4	
11/12/2015	GZG	(No Charge) Edited all intake tracking documents for intakes of LI, intake, & RS; summarized same; emailed team re same; saved docs to database; updated 'Filed Pleadings' folder on database.	0.0	2.5
11/13/2015	MWB	Telephone conference with LP and conference with MN re meet and confer and f/u.	0.5	
11/15/2015	MWB	Review and revise MN draft letter to Defendants re discovery.	0.5	
11/15/2015	MWB	Emails with Team re discovery, settlement and strategy.	0.5	
11/16/2015	MWB	Emails Team re discovery dispute.	0.5	
11/16/2015	MWB	Review and revise draft letter to Uber re discovery.	0.5	
11/16/2015	KSM	(No Charge) Conference with MN re discovery issues.	0.0	0.2
11/16/2015	MSN	Review revisions from M. Bien to draft meet and confer letter, and make additional revisions in accordance with instructions and comments from legal team.	0.5	
11/16/2015	MSN	Email exchange with legal team re revisions to meet and confer letter.	0.4	
11/16/2015	MSN	Review proposed protective order, and draft email to Defendants re same.	0.8	
11/16/2015	MSN	Call with J. Marks re further revisions to meet and confer letter and discovery strategy.	1.0	
11/16/2015	MSN	Emails to J. Marks re outstanding action items.	0.1	

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Date	Person	Description of Services	Hours	Discount
11/16/2015	MSN	Review Judge Cousin's rules re discovery disputes, and begin to outline discovery dispute letter brief.	0.6	
11/16/2015	MSN	Review revisions from M. Bien to draft meet and confer letter, and make additional revisions in accordance with instructions and comments from legal team.	0.5	
11/16/2015	MSN	Email exchange with legal team re revisions to meet and confer letter.	0.4	
11/16/2015	MSN	Review proposed protective order, and draft email to Defendants re same.	0.8	
11/16/2015	MSN	Call with J. Marks re further revisions to meet and confer letter and discovery strategy.	1.0	
11/16/2015	MSN	Emails to J. Marks re outstanding action items.	0.1	
11/16/2015	GZG	(No Charge) Saved documents to database; emailed MSN re same; emailed RH re intake interview.	0.0	0.3
11/17/2015	MWB	Emails with Team re discovery, experts.	0.5	
11/17/2015	MSN	Draft several emails to legal team re expert engagement, Uber policies and practices, prelitigation schedule, and next steps re Uber discovery.	0.7	
11/17/2015	MSN	Review Plaintiffs' first set of Rogs and Defs' objections, and review Plaintiffs' first set of RFAs to prepare for meet and confer.	3.0	
11/17/2015	MSN	Review and revise and comment on draft second set of discovery requests.	2.2	
11/17/2015	MSN	Begin drafting discovery letter brief.	1.0	
11/17/2015	MSN	Draft several emails to legal team re expert engagement, Uber policies and practices, prelitigation schedule, and next steps re Uber discovery.	0.7	
11/17/2015	MSN	Review Plaintiffs' first set of Rogs and Defs' objections, and review Plaintiffs' first set of RFAs to prepare for meet and confer.	3.0	
11/18/2015	MWB	Conference with MN and review emails re discovery disputes, strategy.	0.3	
11/18/2015	MWB	Emails re protective order and experts.	0.2	
11/18/2015	KSM	(No Charge) Conference with MN re discovery issues.	0.0	0.2
11/18/2015	MSN	Review Defs' objections to RFAs, and confer with E. Galvan re strategy re RFA objections and responses.	1.2	

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11/18/2015	MSN	Emails to co-counsel re protective order and Defendants' discovery strategy.	0.2	
11/18/2015	MSN	(No Charge) Confer with paralegal re executing protective order, and confer with legal team re same.	0.0	0.2
11/18/2015	MSN	(No Charge) Confer with K. Manista concerning strategy re Defs' RFA responses, and prepare for discovery meet and confer call with client.	0.0	0.4
11/18/2015	MSN	Call to op. counsel re meet and confer, and confer with J. Marks re next steps.	0.4	
11/18/2015	MSN	Review local rules addressing discovery and discovery disputes, and draft email to legal team proposing next steps re discovery strategy.	0.8	
11/18/2015	MSN	Email exchange with co-counsel re revisions to P's second set of RFPs.	0.2	
11/18/2015	MSN	Email to Defs re execution of protective order.	0.1	
11/18/2015	GZG	(No Charge) Printed out Attachment A to Protective Order for MSN to sign; PDF'ed same and emailed MSN re same; scanned MWB & GZG signature re same; saved to database; saved co-counsel signatures and saved to database, emailed team re same.	0.0	1.0
11/18/2015	GZG	(No Charge) Saved docs to database; emailed MSN re same.	0.0	0.2
11/19/2015	MWB	Emails re expert.	0.2	
11/19/2015	MWB	Emails with LP re strategy.	0.1	
11/19/2015	MWB	Conference with MN.	0.2	
11/19/2015	KSM	(No Charge) Conference with MN re discovery issues and motion to compel.	0.0	0.4
11/19/2015	MSN	Call with J. Marks confer re draft RFI and second set of RFPs.	0.2	
11/19/2015	MSN	Prepare for and conduct intake interview with BB re paratransit.	0.7	
11/19/2015	MSN	(No Charge) Confer with K. Manista re discovery strategy.	0.0	0.3
11/19/2015	MSN	Call with J. Marks re discovery strategy.	0.3	
11/19/2015	MSN	Draft email to op. counsel re joint statement, and emails with legal team re same.	0.6	
11/19/2015	MSN	Review and further revise P's second set of RFPs.	1.1	
11/19/2015	GZG	Intake interview w/RH; sent follow-up email; edits to intake form.	0.9	

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11/19/2015	GZG	(No Charge) Saved filed pleading to database; emailed team re same; updated filed pleadings folder on database.	0.0	0.1
11/20/2015	MWB	Telephone conference with LP re trial strategy.	0.7	
11/20/2015	MWB	Research re Uber drivers, CMPC filings.	1.0	
11/20/2015	KSM	(No Charge) Conference with MN re discovery issues.	0.0	0.4
11/20/2015	MSN	Review Defs' Rog responses, and draft email to J. Marks re same.	0.4	
11/20/2015	MSN	Review finalized expert retention agreement.	0.2	
11/20/2015	MSN	(No Charge) Review request from co-counsel to host inspection at RBGG, confer with staff re same, and respond to co-counsel.	0.0	0.3
11/20/2015	MSN	(No Charge) Confer with other associates re discovery strategy re requests for production of documents.	0.0	0.1
11/20/2015	MSN	Finish preparing notes for meet and confer with Defs later today, and email notes to co-counsel.	0.6	
11/20/2015	MSN	Finish reviewing and revising updated draft of second set of RFPs, and email to co-counsel.	1.0	
11/20/2015	MSN	Email to BGL re requesting production of websites and mobile apps, and emails to legal team re same.	0.3	
11/20/2015	MSN	Call with J. Marks re meeting and conferring with Defendants re discovery requests, revisions to second set of RFPs, and request for inspection.	0.7	
11/20/2015	MSN	(No Charge) Confer with L. Ells re next steps and strategy moving forward.	0.0	0.2
11/20/2015	MSN	(No Charge) Confer with Partner Ells re strategy re discovery.	0.0	0.1
11/20/2015	MSN	(No Charge) Confer with K. Manista re discovery strategy.	0.0	0.4
11/20/2015	MSN	Draft email to Defendants re meet and confer re discovery issue.	0.2	
11/21/2015	MSN	Review Trial memo from Larry.	0.7	
11/21/2015	MSN	Review case documents and begin to outline joint letter brief to court re discovery disputes.	2.2	
11/22/2015	KSM	(No Charge) Review and respond to MN email re discovery issues.	0.0	0.1

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11/22/2015	MSN	Review Rutter guide re production of documents and discovery disputes, and research case law re discovery disputes re geographic scope, temporal scope, and other disputed issues.	4.1	
11/23/2015	MWB	Emails re discovery, strategy.	0.3	
11/23/2015	KSM	(No Charge) Conferences with MN re discovery issues.	0.0	0.2
11/23/2015	MSN	Prep for meet and confer re RFAs and Rogs.	0.5	
11/23/2015	MSN	Confer with J. Marks re joint statement, strategy re depositions, and meet and confer follow up letter.	0.4	
11/23/2015	MSN	Review notes re meet and confer from this morning, and email to J. Marks re same.	0.2	
11/23/2015	MSN	Email to J. Marks re Weber individual fact witness deposition.	0.1	
11/23/2015	MSN	Email to legal team re Rasier CPUC accessibility plan.	0.1	
11/23/2015	MSN	Email to co-counsel re 30(b)(6) depo.	0.1	
11/23/2015	MSN	Review and respond to emails from legal team concerning ESI protocol and electronic discovery issues.	0.2	
11/23/2015	MSN	Confer with J. Marks re additional revisions to second set of requests for production of documents.	0.3	
11/23/2015	MSN	Continue to draft joint statement concerning discovery dispute.	1.5	
11/23/2015	MSN	(No Charge) Confer with K. Manista re next steps in discovery.	0.0	0.2
11/23/2015	GZG	Emails re intake call w/FH.	0.1	
11/23/2015	GZG	(No Charge) Saved letter to database.	0.0	0.1
11/24/2015	MWB	Emails re discovery, strategy, planning.	0.5	
11/24/2015	MWB	Telephone conference with co-counsel re settlement, discovery, staffing.	1.0	
11/24/2015	MWB	Review revised settlement agreement.	0.5	
11/24/2015	KSM	(No Charge) Review and revise draft joint statement; conference with MN re same.	0.0	0.6
11/24/2015	KSM	(No Charge) Conferences with MN re motion to compel.	0.0	0.1
11/24/2015	MSN	Review additional supplemental disclosures, and respond to emails from co-counsel re same.	0.3	
11/24/2015	MSN	Strategy call re settlement and continued discovery efforts with Uber.	0.9	
11/24/2015	MSN	Continue to revise draft joint statement re discovery disputes.	1.0	

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Date	Person	Description of Services	Hours	Discount
11/24/2015	MSN	(No Charge) Confer with K. Manista re additional revisions to joint statement.	0.0	0.2
11/24/2015	MSN	Review and revise meet and confer follow up letter e Nov. 23 meet and confer.	1.0	
11/24/2015	MSN	Review and revise Plaintiffs' third set of RFPs, Plaintiffs' second set of Rogs, and Plaintiffs' second notice of 30(b)(6) deposition.	1.5	
11/24/2015	MSN	Review, revise, and comment on draft summary of meet and confer, and email to J. Marks re same.	0.7	
11/24/2015	MSN	Review case documents and continue to draft joint statement re discovery disputes.	2.0	
11/24/2015	MSN	Research when Uberx became available to the public for joint statement and email co-counsel re same.	0.2	
11/24/2015	MSN	Begin to review draft settlement counterproposal from Uber.	0.4	
11/24/2015	GZG	(No Charge) Saved discovery requests to database; research re intake interviews, emailed team re same.	0.0	0.3
11/24/2015	GZG	Intake of FH.	0.2	
11/24/2015	GZG	Updated tracking charts & master summaries of intakes to reflect RH intake; summarized & emailed team re same.	0.9	
11/25/2015	MWB	Emails re discovery requests.	0.3	
11/25/2015	MSN	Review and respond to emails from legal team concerning service of additional discovery and Defendants' discovery delays.	0.5	
11/26/2015	MSN	Review case law re proper temporal scope and proper geographic scope of discovery.	3.0	
11/27/2015	MWB	Review emails from LP re depositions, proposed settlement agreement.	0.3	
11/27/2015	MSN	Review case law re discovery of market research, financial information, and delays producing documents.	3.1	
11/28/2015	MWB	Review and revise proposed settlement agreement.	1.5	
11/29/2015	MWB	Emails with Team re settlement agreement, discovery.	0.5	
11/29/2015	MSN	Continue legal research re discovery of market research and discovery delays, finish draft of statement, and send to J. Marks for input.	3.5	
11/29/2015	MSN	Draft declaration ISO joint statement concerning discovery issues.	2.0	

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Date	Person	Description of Services	Hours	Discount
11/29/2015	MSN	Review revisions and comments from J. Marks re joint statement re discovery disputes, incorporate edits, and circulate revised statement to team.	0.5	
11/30/2015	MWB	Review and revise discovery statement.	0.5	
11/30/2015	MWB	Draft email to Team re discovery, settlement.	0.2	
11/30/2015	MWB	Telephone conference with Team re discovery and settlement.	1.0	
11/30/2015	MWB	Emails with AS-Team.	0.5	
11/30/2015	KSM	(No Charge) Conference with MN re privilege log issues; follow up re same.	0.0	0.3
11/30/2015	MSN	Review MWB revisions to joint statement.	0.3	
11/30/2015	MSN	Finish initial draft of declaration ISO joint statement, cross reference declaration against joint statement, and make additional revisions to declaration and to joint statement, and circulate updated versions of documents to legal team.	2.5	
11/30/2015	MSN	Call with legal team concerning strategy re discovery and settlement.	0.7	
11/30/2015	MSN	Draft additional content for joint statement and declaration ISO joint statement based on feedback from strategy call, and input pin cites into joint statement, and send joint statement to word processing for formatting.	2.5	
11/30/2015	MSN	Confer with MWB re strategy re Joint Statement re email re discovery from A. Spurchise.	0.1	
11/30/2015	MSN	Call with L. Paradis re joint statement.	0.1	
11/30/2015	MSN	Revise to shorten formatted version of joint statement, and email to op. counsel.	0.8	
11/30/2015	MSN	Further revise 30(b)(6) depo script, and confer with J. Marks re same.	1.3	
11/30/2015	GZG	(No Charge) Saved documents to database; emailed MN re same.	0.0	0.2
12/1/2015	MWB	Emails with Team-Defendants re discovery and settlement.	1.0	
12/1/2015	MWB	Telephone conference and emails re postponement of discovery, settlement.	1.0	
12/1/2015	MSN	Draft email to legal team re follow up with Defendants concerning joint statement concerning discovery.	0.4	
12/1/2015	MSN	Finish draft of 30(b)(6) depo script, and email to M. Bien re same.	2.4	

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12/1/2015	MSN	Email to legal team concerning joint statement.	0.1	
12/1/2015	MSN	Conf. call with A. Spurchise, L. Paradis, and T. Elder re settlement and discovery dispute.	0.8	
12/2/2015	MWB	Emails Team re Settlement Agreement, discovery.	0.3	
12/2/2015	MWB	Review and revise Settlement Agreement.	1.0	
12/2/2015	MWB	Telephone conference and email MN re discovery and Settlement Agreement.	0.3	
12/2/2015	MSN	Revise joint statement concerning discovery disputes in accordance with input from legal team, send to word processor for formatting, and draft email to op. counsel re same.	1.5	
12/2/2015	MSN	Draft email to Paradis re op counsel response to agreement re discovery schedule.	0.1	
12/2/2015	MSN	Review formatted documents from word processor, and transmit updated joint statement and declaration ISO same to op. counsel.	0.4	
12/2/2015	MSN	Draft email to T. Elder re revised draft settlement agreement.	0.1	
12/2/2015	MSN	Review and further revise updated draft settlement agreement, and draft lengthy email to legal team re my revisions.	2.1	
12/2/2015	MSN	Review and respond to additional emails from legal team concerning additional edits and review by M. Bien.	0.2	
12/2/2015	MSN	Call with M. Bien re review of updated draft settlement agreement.	0.1	
12/2/2015	GZG	(No Charge) Reviewed emails re discovery; rescheduled depositions; emails w/MSN re same.	0.0	0.3
12/3/2015	MSN	Review language of certain provisions of finalized updated settlement draft that T. Elder circulated to Defendants.	0.3	
12/4/2015	MSN	Confer with G. Gonzalez re fact research re status of PUC rule making concerning disability access regulations.	0.2	
12/4/2015	MSN	Prepare draft email to op. counsel re joint statement, and circulate to legal team for comment.	0.1	
12/4/2015	MSN	Send revised email to op. counsel re joint statement re discovery disputes.	0.1	
12/4/2015	MSN	(No Charge) Review article concerning new Uber lawsuit under Unruh Act re anti-gay discrimination.	0.0	0.2
12/4/2015	GZG	Research re CPUC proceeding; emails w/MWN & co-counsel re same.	1.0	

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12/4/2015	GZG	(No Charge) Saved confirmation notices from Thorsnes for upcoming depositions to database.	0.0	0.1
12/7/2015	MWB	Emails and telephone conferences re discovery dispute, settlement.	0.7	
12/7/2015	MSN	Review emails circulated concerning settlement and joint statement re discovery disputes.	0.5	
12/7/2015	GZG	Research re CPUC proceedings; emailed summary of findings to team.	1.2	
12/8/2015	MWB	Conference MN and attend meeting with expert.	0.5	
12/8/2015	MWB	Review stip to extend deadline.	0.2	
12/8/2015	KSM	(No Charge) Conference with MN re discovery and settlement talks.	0.0	0.1
12/8/2015	MSN	Review draft scheduling stipulation, and email co-counsel re same.	0.2	
12/8/2015	MSN	Draft email to co-counsel re logistics for meeting with expert later today.	0.3	
12/8/2015	MSN	Emails to co-counsel re drafting addenda to settlement agreement.	0.1	
12/8/2015	MSN	Review discovery papers and correspondences re expert, and draft agenda for meeting with expert.	0.4	
12/8/2015	MSN	Meeting with R. Martell IO psych expert re potential litigation strategy and needed discovery.	1.8	
12/8/2015	MSN	Confer with T. Elder re next steps re settlement agreement, addenda to settlement agreement, and discovery.	0.5	
12/9/2015	MSN	Draft summary of 12-8-2015 meeting with R. Martell and email to co-counsel.	2.5	
12/10/2015	MWB	Emails re settlement, discovery.	0.5	
12/10/2015	KSM	(No Charge) Conference with MN re deposition preparation.	0.0	0.2
12/10/2015	MSN	(No Charge) Confer with K. Manista re review of 30(b)(6) depo script.	0.0	0.1
12/11/2015	MSN	Email to legal team re deposition and discovery schedule.	0.1	
12/14/2015	LAE	(No Charge) emails with MN re loadstar for settlement discussions, conf with JP re same.	0.0	0.2
12/14/2015	KSM	(No Charge) Review deposition outline; edits to same; email to MN re same.	0.0	0.8

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Date	Person	Description of Services	Hours	Discount
12/14/2015	MSN	Call with legal team re strategy re revisions from op. counsel to draft settlement agreement.	1.3	
12/14/2015	MSN	(No Charge) Emails with L. Ells and accountant re RBGG's current attorneys' fees billed to this case.	0.0	0.3
12/14/2015	GZG	(No Charge) Updated tracking charts & summaries for 3 intake's experiences; emailed intakes re follow-up; emailed team re updates; saved documents to shared folder.	0.0	2.2
12/15/2015	KSM	(No Charge) Conference with MN re deposition preparation.	0.0	0.7
12/15/2015	MSN	Revise Addendum 1 to draft settlement agreement, and circulate to legal team.	1.0	
12/15/2015	MSN	(No Charge) Emails to co-counsel re attorneys' fees.	0.0	0.2
12/15/2015	MSN	Review and revise draft settlement agreement, and circulate updated draft to legal team.	1.1	
12/15/2015	GZG	(No Charge) Saved Filed Pleadings to database; emails w/MN re same.	0.0	0.3
12/16/2015	KSM	(No Charge) Conference with MN re settlement issues.	0.0	0.4
12/16/2015	MSN	Calls to J. Marks re addendum 1 to draft settlement agreement.	0.5	
12/16/2015	MSN	Call with T. Elder re addendum 1 to draft settlement agreement and deposition schedule.	0.3	
12/16/2015	MSN	Review and revise draft addendum 1 to settlement agreement.	1.0	
12/16/2015	MSN	Emails to co-counsel re subsequent revisions to draft settlement agreement.	0.3	
12/16/2015	MSN	Prepare proposed modified deposition schedule, and email to A. Spurchise re same.	0.5	
12/16/2015	GZG	Emailed intake re interview.	0.1	
12/17/2015	MSN	Email to Defendants re extending discovery deadlines.	0.2	
12/17/2015	GZG	(No Charge) Saved deposition confirmation notices to database; updated calendar w/new depo dates; emailed MSN re same.	0.0	0.4
12/21/2015	MWB	Emails re M. Kelly complaint re Uber denial.	0.2	
12/21/2015	MSN	Review and respond to email from co-counsel re discrimination incident experienced by M. Kelly.	0.2	
12/21/2015	MSN	Draft email to op. counsel re deposition schedule, and contact with court reporter re same.	0.3	

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12/22/2015	MWB	Emails with AS re discovery dates.	0.1	
12/22/2015	MSN	Emails with legal team concerning discrimination incident involving Plaintiff Kelly and emails with A. Spurchise re deposition schedule.	0.3	
12/23/2015	MWB	Emails with Team re discovery and settlement talks.	0.5	
12/23/2015	GZG	(No Charge) Saved depo confirmations to database; recalendared depositions.	0.0	0.3
12/28/2015	MWB	Review AS-LP emails.	0.2	
12/28/2015	MWB	Emails and telephone conferences with LP re discovery, strategy.	0.3	
12/28/2015	GZG	(No Charge) Reviewed Defs response to Plts 1st request for inspection; saved same to database.	0.0	0.2
12/29/2015	GZG	Reviewed emails re FH intake; TC w/ FH; edited Howard intake form; updated tracking charts & summaries to reflect FH intake; emailed team re same.	1.4	
12/31/2015	MWB	Review AS email and revised draft Settlement Agreement.	0.5	
12/31/2015	MWB	Emails with TE-Team re monetary, Monitor issues.	0.5	
1/1/2016	MWB	Review AS-TE emails re Settlement Draft.	0.2	
1/1/2016	MWB	Emails with Team re strategy and settlement.	0.3	
1/1/2016	MWB	Review AS-TE emails re Settlement Draft.	0.2	
1/1/2016	MWB	Emails with Team re strategy and settlement.	0.3	
1/2/2016	MWB	Emails re M. May re Uber experiences.	0.2	
1/2/2016	MWB	Emails Team re strategy and settlement.	0.2	
1/3/2016	MWB	Emails with Team and telephone conference with TE and LP re negotiations strategy.	1.0	
1/4/2016	MWB	Prepare for and participate in telephone conference with Team and AS re settlement and discovery.	1.5	
1/4/2016	MWB	Review and revise email to Uber and conference with MN.	0.3	
1/4/2016	MSN	Call with op. counsel re settlement and discovery schedule.	0.7	
1/4/2016	MSN	Team strategy call re CMS, deposition schedule, and follow up with Andrew re earlier conference call.	0.3	
1/4/2016	MSN	Review email correspondence among legal team and between plaintiffs and op. counsel, and draft follow up email to A. Spurchise concerning conference call earlier today.	1.0	

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1/4/2016	MSN	Review draft settlement agreement from Op. counsel 12-31-15.	0.6	
1/4/2016	MSN	Prepare to draft case management statement.	0.1	
1/4/2016	GZG	(No Charge) Saved deposition cancellations to database, emailed team re same; rescheduled Uber Site Inspection, emailed team re same.	0.0	0.3
1/5/2016	MSN	Email to T. Elder re Colman deposition.	0.1	
1/5/2016	MSN	Draft case management statement, and send to word processing for revisions.	0.8	
1/6/2016	MWB	Emails and conference with MN re strategy.	0.5	
1/6/2016	MWB	Review AS-MN emails re CMC statement.	0.2	
1/6/2016	MSN	Email and call to op. counsel re CMS and discovery dates.	0.2	
1/6/2016	MSN	Review and revise updated CMS from op. counsel.	0.2	
1/6/2016	MSN	Emails to legal team and op. counsel re revisions to CMS.	0.2	
1/6/2016	MSN	(No Charge) Confer with paralegal and word processor re finalizing and filing CMS.	0.0	0.2
1/6/2016	MSN	(No Charge) Check local rules and standing order, and email to paralegal with instructions re courtesy copies.	0.0	0.2
1/6/2016	MSN	(No Charge) Email to paralegal re updating case calendar.	0.0	0.1
1/6/2016	MSN	Confer with M. Bien re CMS and strategy re discovery and settlement.	0.1	
1/6/2016	GZG	(No Charge) Rescheduled close of fact discovery; cancelled Ting deposition on calendar; emailed MSN re other depositions.	0.0	0.1
1/6/2016	GZG	(No Charge) Emails w/MSN re Updated Joint Case Management Statement; filed same w/court; saved filed doc to database.	0.0	0.3
1/7/2016	MWB	Emails re UBER proposal and response.	0.3	
1/7/2016	MWB	Conferences and emails MN-Team re response to Uber.	0.5	
1/7/2016	MWB	Review MN-Team-AS emails re Settlement, discovery.	0.5	
1/7/2016	MSN	Emails to legal team re Defendants' most recent proposal re settlement.	0.4	
1/7/2016	MSN	Draft counterproposal re Addendum 1 and circulate to legal team.	0.9	
1/7/2016	MSN	Review and revise updated version of Addendum 1 circulated by co-counsel.	0.4	

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1/7/2016	MSN	Draft email to legal team re updated draft addendum 1 for settlement agreement, proposed language re payments to monitor, and strategy re NFB monitor payments.	0.4	
1/7/2016	MSN	Call with J. Marks re settlement counterproposal.	0.1	
1/7/2016	MSN	Draft email to op. counsel responding to Defs' recent settlement proposal, and circulate to legal team.	0.4	
1/7/2016	MSN	Call with T. Elder concerning revisions to Addendum 1, other settlement issues, and discovery strategy.	0.4	
1/7/2016	MSN	Additional revisions to Addendum 1, review revised email and revised monitor language from T. Elder, and email to op. counsel re same.	0.4	
1/7/2016	GZG	Reviewed MSN email re chambers copies to be served; reviewed local civil rules for ND CA court; prepared chambers copy; discussion w/MSN re same.	0.6	
1/8/2016	MWB	Emails MN-AS re settlement and discovery.	0.4	
1/8/2016	MWB	Conferences and emails with MN re strategy, discovery, settlement.	0.6	
1/8/2016	KSM	(No Charge) Email and conf with MN re settlement and discovery issues.	0.0	0.2
1/8/2016	MSN	(No Charge) Email to T. Elder re settlement and litigation strategy.	0.0	0.2
1/8/2016	MSN	Email to T. Elder re settlement and litigation strategy.	0.2	
1/8/2016	MSN	Emails with co-counsel re deposition schedule.	0.2	
1/8/2016	MSN	Email to A. Spurchise re proposed discovery schedule.	0.5	
1/8/2016	MSN	Email to legal team re op. counsel's proposed discovery schedule.	0.4	
1/8/2016	MSN	Call with M. Hingson re case status update and availability for deposition.	0.5	
1/8/2016	MSN	Prep for and call to A. Spurchise re discovery schedule.	0.1	
1/8/2016	MSN	Email to A. Spurchise re op. counsel's proposed discovery schedule.	0.5	
1/10/2016	MWB	Emails Team re CMC.	0.2	
1/11/2016	MWB	Emails Team re CMC strategy, discovery and settlement.	0.2	
1/11/2016	MWB	Emails re clients depo dates.	0.2	
1/11/2016	MSN	Emails with legal team re CMC hearing.	0.1	

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1/11/2016	MSN	Review and respond to emails re settlement strategy.	0.1	
1/11/2016	MSN	Review and revise draft scheduling stipulation, and emails to J. Marks re same.	0.2	
1/12/2016	MWB	Emails Team re CMC, strategy, settlement.	0.5	
1/12/2016	KSM	(No Charge) Conf with MN re case management conference.	0.0	0.1
1/12/2016	MSN	(No Charge) Confer with T. Elder re logistics for CMC.	0.0	0.1
1/12/2016	MSN	Emails with co-counsel re supplementing disclosures.	0.1	
1/12/2016	MSN	(No Charge) Emails to M. Bien re logistics for Uber CMC.	0.0	0.1
1/12/2016	MSN	Emails with legal team re discovery schedule, and settlement strategy.	0.2	
1/12/2016	MSN	Call with T. Elder re settlement conference, CMC< and discovery schedule.	0.1	
1/12/2016	MSN	Email to op. counsel re proposed settlement conference.	0.1	
1/12/2016	MSN	Email to op. counsel re proposed discovery schedule.	0.1	
1/12/2016	MSN	(No Charge) Prepare for CMC: draft opening statement, review litigation schedule, review Ps' previously served discovery and draft timeline re discovery history, and Ds' responses, previously filed CMC statements, model CMC order, Judge Cousins' standing order, San Jose fed court standing order, relevant local rules, and remaining discovery disputes.	0.0	4.0
1/12/2016	GZG	(No Charge) Saved discovery to database, saved dockets to databse, routed to team; reviewed discovery & compiled discovery timeline for MSN, emails w/MSN re same.	0.0	1.3
1/13/2016	MWB	Review AS email re Settlement terms and emails Team re same.	0.5	
1/13/2016	MWB	Telephone conference and conference with MN re revisions to settlement agreement and discovery.	0.5	
1/13/2016	MSN	Travel to and appear at CMC in San Jose federal court (.1 CMC hearing, and 5.3 travel).	5.8	
1/13/2016	MSN	Review correspondences re settlement, update draft settlement agreement, and revise addendum 1 to settlement agreement.	1.2	
1/13/2016	MSN	Emails to legal team re modifying relief under settlement agreement and notice after final approval.	0.3	
1/13/2016	MSN	Email with legal team re Next steps re settlement and discovery.	0.2	

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Date	Person	Description of Services	Hours	Discount
1/13/2016	GZG	(No Charge) Saved discovery notices to database.	0.0	0.1
1/13/2016	GZG	(No Charge) Reviewed settlement addendum.	0.0	0.3
1/14/2016	MWB	Emails with Team re settlement agreement and addendums.	0.5	
1/14/2016	MSN	Emails to legal team re revisions to Addendum 1, and revise Addendum 1.	0.4	
1/14/2016	MSN	(No Charge) Update Partner Ells re status of Uber settlement negotiations.	0.0	0.2
1/14/2016	MSN	Draft response to op. counsel's settlement proposal, and circulate to legal team for review.	0.6	
1/14/2016	MSN	Review feedback from legal team re response to defendants' settlement proposal, and finalize response, and send to A. Spurchise.	0.2	
1/15/2016	MWB	Emails re client communications re settlement.	0.5	
1/15/2016	MSN	Review NDCA procedural guidance re class action settlements, and email to legal team re same.	0.2	
1/15/2016	MSN	(No Charge) Emails to legal team re class settlement and amended class action retainers with clients.	0.0	0.2
1/15/2016	MSN	Review causes of action from Elder v. NCBE and Enyart v. NCBE re intake TO.	0.3	
1/16/2016	MWB	Emails re Uber discovery responses.	0.2	
1/17/2016	MWB	Emails re Uber discovery and strategy.	0.2	
1/18/2016	MWB	Emails AS-MN-Team re settlement and discovery.	0.5	
1/18/2016	MSN	Emails to legal team and op. counsel re adjusting discovery schedule and trial date.	0.3	
1/19/2016	MWB	Conference with MN re deadlines and strategy for completing negotiations.	0.2	
1/20/2016	MWB	Conference and telephone conference and emails with MN re stipulation.	0.3	
1/20/2016	MWB	Review draft stip and emails to AS re trial date and settlement.	0.3	
1/20/2016	MSN	Call with J. Marks re draft stipulation, settlement strategy, and additional necessary revisions to settlement agreement.	0.7	
1/20/2016	MSN	(No Charge) Review, organize, and revise case notes.	0.0	0.1
1/20/2016	MSN	Email to op. counsel re scheduling stipulation and proposed schedule for proceeding with settlement.	0.1	

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Date	Person	Description of Services	Hours	Discount
1/21/2016	MSN	Meeting with M. Bien re next steps with Op. Counsel.	0.1	
1/22/2016	MWB	Emails AS-Team re stipulation.	0.5	
1/22/2016	MSN	Emails to A. Spurchise re timeframe for finalizing settlement agreement.	0.2	
1/22/2016	MSN	Email and call with J. Marks re revision to scheduling stipulation.	0.3	
1/22/2016	GZG	(No Charge) Downloaded filed pleading & saved to database; routed same to team.	0.0	0.1
1/25/2016	MWB	(No Charge) Conference with MN re Uber projects.	0.0	0.2
1/25/2016	MSN	Emails to legal team re pending action items and next steps.	0.2	
1/25/2016	MSN	Emails with legal team re settlement administrator for settlement website.	0.2	
1/25/2016	GZG	Reviewed calendar dates for upcoming deadlines; emailed MSN re same.	0.2	
1/27/2016	GZG	Updated tracking charts & summary of denials to reflect new denial of RH; updated filed pleadings folder on database.	0.6	
2/1/2016	MWB	Conference with MN and email with AS re settlement documents.	0.2	
2/1/2016	MSN	Draft email to op. counsel re draft addendums to settlement agreement.	0.2	
2/1/2016	MSN	(No Charge) Attempt to contact plaintiffs' counsel in Ramos v. Uber, and email to legal team re same.	0.0	0.5
2/5/2016	MSN	(No Charge) Email to paralegal re scheduling.	0.0	0.1
2/5/2016	GZG	(No Charge) Updated tracking chart & summaries to reflect latest denial for FH; reviewed emails re new intakes; emailed new intakes for interviews; saved docs to shared file; emailed team re same.	0.0	1.6
2/8/2016	GZG	Reviewed emails re intake interview appointments; responded to two intake interviews; emailed team re possible referral re service animal legislation.	0.3	
2/9/2016	GZG	Reviewed emails re B & U intakes; conducted intakes of B & U edited intake notes; sent follow-up emails to B & U; emailed to re B inquiry.	2.1	
2/10/2016	MWB	Telephone conference with MN re strategy and f/u.	0.3	
2/10/2016	MWB	Review AS email re settlement agreement.	0.2	

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2/10/2016	GZG	Edits to intakes for B & U; updated tracking charts & summaries to reflect these intakes; summarized intakes & routed summaries to team.	2.8	
2/11/2016	MWB	Emails re settlement agreement and Addendum.	0.5	
2/11/2016	MSN	Review updated addendum 1, and email to team re same.	0.2	
2/11/2016	GZG	(No Charge) Reviewed email from FH re recent denials; captured denials on tracking chart & summaries; emailed Ms. H re documentation.	0.0	0.8
2/12/2016	MSN	Review article re consumer Uber class action for possible relevance to our case, and email to co-counsel re same.	0.2	
2/16/2016	GZG	(No Charge) Reviewed emails from PH re Uber incident, replied to same; reviewed emails sent by U, saved to shared file, replied to U.	0.0	0.3
2/16/2016	GZG	Conducted intake interview w/ JM edited interview notes.	0.8	
2/18/2016	MWB	Conference with MN and telephone conference with LP re negotiations.	0.2	
2/18/2016	MSN	Team strategy call re planning next steps re Uber.	0.2	
2/18/2016	MSN	Email to op. counsel re settlement process.	0.1	
2/18/2016	GZG	Reviewed email re new intake; emailed team re same.	0.1	
2/19/2016	GZG	Intake interview w/ MO; edits to intake form.	1.0	
2/19/2016	GZG	Completed intake of JM; updated tracking charts & summaries to reflect his experiences; summarized experiences & emailed team re same.	1.0	
2/19/2016	GZG	Reviewed emails re intake for H; emailed H re possible interview; reviewed emails from DB; responded to DB, emailed TRE re DB.	0.3	
2/22/2016	MWB	Emails with AS-MN re settlement.	0.3	
2/22/2016	MWB	Conference with MN re f/u.	0.2	
2/22/2016	MSN	Further revise email to op. counsel re addendums to settlement agreement and send to op. counsel.	0.2	
2/22/2016	MSN	Review email from Op. counsel re addendums 3-4 to settlement agreement, review settlement agreement, draft email to legal team re same, and prepare draft email responding to op. counsel and circulate to legal team for review.	0.5	

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2/22/2016	MSN	Draft updated response email to op. counsel re addendums 3-4 for settlement agreement.	0.4	
2/22/2016	MSN	Call with J. Marks re drafting addendums 3 - 4 of settlement agreement.	0.2	
2/22/2016	MSN	Begin to outline Addendum 3 to settlement agreement.	0.7	
2/22/2016	GZG	(No Charge) Downloaded documents to database and shared file, emails w/MSN re same.	0.0	0.3
2/23/2016	MSN	Review DOT ADA regulations and technical assistance documents re service animals, draft email to legal team re difference between DOT regs and DOJ regs, and revise draft Addendum 3 accordingly.	1.8	
2/23/2016	MSN	Review regulations and DOJ guidance documents re service animal requirements, and draft Addendum 3 to settlement agreement (guidance document for Uber support staff).	4.1	
2/23/2016	MSN	Call with J. Marks re revisions to Addendum 3.	0.4	
2/24/2016	MSN	Review revisions from J. Marks to draft of addendum 3, make additional revisions myself, and circulate to legal team.	1.2	
2/25/2016	MWB	Emails with Team re Addendum.	0.3	
2/25/2016	GZG	Reviewed emails re H intake; attempted to contact H.	0.2	
2/26/2016	MWB	Emails with AS-Team re CMC statement, addendum.	0.5	
2/26/2016	MSN	Emails with paralegal re additional fact research re Uber Pool relevant to settlement.	0.3	
2/26/2016	MSN	Review and analyze IRT training document from A. Spurchise, and rveiw DOJ regs and guidance documents re Uber Pool and surcharges.	0.8	
2/26/2016	MSN	Research DOT regulations re emotion support animals, and email to legal team re same.	0.2	
2/26/2016	MSN	Emails to paralegal re fact research re Uber customer relations staff and Uber Pool.	0.2	
2/26/2016	MSN	Review and make significant number of revisions to draft Addendum 4.	1.3	
2/26/2016	MSN	Call with J. Marks re IRT training document and revisions to Addendums and draft settlement agreement.	0.7	
2/26/2016	FGL	(No Charge) Email from/to MSN re redline of addendum to settlement agreement and redline same (.2).	0.0	0.2

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Date	Person	Description of Services	Hours	Discount
2/26/2016	GZG	(No Charge) Research re Uber position; drafted memo; sent memo to MSN.	0.0	1.0
2/26/2016	GZG	(No Charge) Research for MSN re Uber Pool policy; emails w/MSN re findings.	0.0	0.5
2/26/2016	GZG	(No Charge) Reviewed discovery saved to database against discovery rec'd via mail; discussion w/MSN re same.	0.0	0.2
2/26/2016	GZG	Telephone interview w/ MH re recent denials; routed filed pleading to team.	0.8	
2/28/2016	MSN	Significantly revise draft Addendum 3 to settlement agreement.	2.7	
2/29/2016	MSN	Compare IRT, draft settlement agreement, and current draft of Addendum 3, and make revisions to Addendum 3 to make consistent with settlement agreement and to import relevant portions of IRT training materials.	2.0	
3/1/2016	MSN	Review Addendum 4, and emails to co-counsel re same.	0.3	
3/1/2016	MSN	Confer with co-counsel re status of revisions to draft Addendum 3.	0.2	
3/2/2016	MSN	Draft long email to legal team re inconsistencies between IRT training from op. counsel and terms of current draft of settlement agreement.	0.7	
3/3/2016	MWB	Emails re settlement modifications.	0.3	
3/3/2016	MSN	Review updated version of draft Addendum 3, draft email to legal team re additional revision, and draft email to legal team re Addendum 4.	0.7	
3/3/2016	MSN	Begin drafting joint motion for preliminary approval of class settlement.	0.5	
3/3/2016	MSN	Review current draft of Addendum 4, call with J. Marks re same, and re revisions to settlement agreement.	0.5	
3/3/2016	MSN	Revise Addendum 1 to make it consistent with DOT service animal definition, and email to legal team re same.	0.3	
3/4/2016	MWB	Emails re settlement administration and other issues.	0.2	
3/4/2016	MSN	Outline mtn. for preliminary approval.	2.0	
3/4/2016	MSN	Confer with paralegal re fact research for motion for preliminary approval.	0.1	
3/4/2016	MSN	Emails to legal team re possible claims administrator.	0.2	
3/4/2016	MSN	Review revised addendum 4 and revised settlement agreement, and raft emails to JZM re same.	0.4	

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3/4/2016	GZG	(No Charge) Fact research re number of guide dog users in the US; emailed MSN re same.	0.0	0.2
3/5/2016	MSN	Draft parties section of joint motion for preliminary approval.	1.0	
3/5/2016	MSN	Draft procedural history and history of settlement negotiations for joint motion for preliminary approval.	1.6	
3/6/2016	MSN	Begin to draft summary of settlement agreement portion of motion for preliminary approval.	2.6	
3/6/2016	MSN	Continue to draft summary of settlement portion of preliminary approval.	1.5	
3/6/2016	MSN	Continue to draft summary of settlement portion of settlement agreement.	2.5	
3/7/2016	MWB	Emails re negotiations.	0.2	
3/7/2016	MSN	Review and revise draft Addendum 5 to settlement agreement, and email to legal team re same.	0.3	
3/7/2016	MSN	Emails to legal team re upcoming CMC.	0.1	
3/7/2016	GZG	(No Charge) Research re filed pleadings, emailed MSN re same.	0.0	0.2
3/8/2016	MWB	Emails Team and conference with MN re Lyft negotiations and prep for negotiations and prep for meeting.	0.5	
3/8/2016	MWB	Emails Team and conference with MN re negotiations and motion to approve settlement.	0.5	
3/8/2016	MSN	Review case records re outstanding issues in settlement agreement, research class definition issues, and Draft long email to legal team re outstanding issues to resolve re settlement agreement and motion for preliminary approval.	1.5	
3/8/2016	MSN	Call with JZM re draft addendums to settlement agreement and issues with class definition.	0.9	
3/8/2016	MSN	Review updated version of Addendum 5, make further revisions, email to legal team with explanation re same.	0.5	
3/8/2016	MSN	Call with KCC re quote for building claims administration website, and email to legal team re same.	0.4	
3/9/2016	MWB	Telephone conference and emails MN re negotiations.	0.2	
3/9/2016	MSN	Review and finalize Addendum 1, Addendum 4, and Addendum 5 for transmission to defs., call with co-counsel re resolving issues in Addendums before transmitting to defs., and draft and send email to Defs. Re same.	2.0	

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Date	Person	Description of Services	Hours	Discount
3/9/2016	MSN	(No Charge) Email to co-counsel re class attorney-client retainers.	0.0	0.1
3/9/2016	MSN	Emails to KCC re possible services for settlement.	0.1	
3/9/2016	MSN	Additional Emails to legal team re revisions to class definition.	0.3	
3/10/2016	MWB	Conference with co-counsel and emails re negotiations and strategy re settlement.	0.5	
3/10/2016	MSN	Call with T. Elder re class definition.	0.1	
3/10/2016	MSN	Review and respond to emails from legal team re class definition.	0.2	
3/10/2016	MSN	Calls with JZM re revisions to class definition.	0.2	
3/10/2016	MSN	(No Charge) Update draft amended retainer agreements for clients, and email to paralegal with instructions re same.	0.0	1.0
3/10/2016	MSN	Strategy meeting re class definition Uber Pool issue, and de-matching issue and follow up with Andrew re same.	0.5	
3/10/2016	MSN	(No Charge) Email to TRE re retainer agreements.	0.0	0.1
3/11/2016	MSN	(No Charge) Review updated draft retainer agreements from paralegal, additional revisions to NFB of Cal. retainer, and prep NFB national retainer, and email to T. Elder re same.	0.0	0.8
3/11/2016	GZG	(No Charge) Updated billing rates on all retainer agreements; emails w/MSN re same.	0.0	0.3
3/12/2016	MSN	, Summarize service animal policy, revise other portions of settlement agreement summary, Email to T. Elder re attorney decl. ISO mtn. prelim approval.	0.8	
3/12/2016	MSN	Further revise class definition in settlement agreement, draft section of motion re class definition, and review case law re ADA deterrence claims.	0.4	
3/12/2016	MSN	Review case law re numerosity requirement, and draft numerosity section of motion.	2.6	
3/13/2016	MSN	Review case law re commonality, and draft commonality section of legal argument in joint motion for preliminary approval.	3.2	
3/13/2016	MSN	Review case law and draft typicality and adequacy components of argument.	3.0	
3/14/2016	MSN	Finish drafting (b)(2) section of argument in mtn for preliminary approval.	1.0	

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3/14/2016	MSN	Review case law re ascertainability and draft ascertainability section of motion for preliminary approval.	2.5	
3/14/2016	MSN	Research possible overbreadth concern re (b)(2) class including members who had not been injured, and draft email to co-counsel re same.	1.5	
3/14/2016	MSN	Begin to draft (b)(2) section of argument.	0.2	
3/15/2016	MWB	Emails with MN-Team re negotiations in class issues.	0.2	
3/15/2016	MSN	Draft section of mtn. for preliminary approval re scheduling order and conclusion, and revise other sections of legal argument.	1.0	
3/15/2016	MSN	Review case law re preliminary approval of settlement, and Draft section of argument in mtn for preliminary approval re preliminary approval being appropriate.	2.5	
3/15/2016	MSN	Emails to legal team re settlement agreement, class definition, and decl. ISO mtn for preliminary approval.	0.3	
3/16/2016	MSN	Email to A. Spurchise re settlement website and notice.	0.2	
3/16/2016	MSN	Draft introduction to motion for preliminary approval, and begin to revise motion.	1.9	
3/16/2016	MSN	Continue to revise mtn. for preliminary approval.	0.8	
3/16/2016	MSN	Emails to legal team re handling CAFA notice.	0.2	
3/16/2016	MSN	Review case law re distribution of class notice, and draft section of motion for preliminary approval re distribution of notice plan.	1.6	
3/17/2016	MWB	Emails re motion for preliminary approval and settlement.	0.5	
3/17/2016	MSN	Draft proposed order preliminarily approving settlement and other settlement related matters.	1.0	
3/17/2016	MSN	Revise/shorten motion for preliminary approval, harmonize sections, proof read, and email to legal team re same.	6.3	
3/17/2016	GZG	(No Charge) Research re number of intakes; emails w/MSN & co-counsel re same.	0.0	0.3
3/17/2016	GZG	(No Charge) Updated intakes of H & LI with new information (per co-counsel email).	0.0	0.5
3/18/2016	MWB	Review and revise motion for class certification.	1.0	
3/18/2016	MWB	Emails with Team re class certification and 2nd amended complaint.	0.5	

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Date	Person	Description of Services	Hours	Discount
3/18/2016	MSN	Contact ACB re publication distribution schedule, Review information from T. Elder re NFB publication schedules, Prepare schedule for approval of settlement and fee motion, and draft email re same to legal team.	1.4	
3/18/2016	MSN	Review and respond to emails from legal team re proposed approval schedule.	0.3	
3/18/2016	MSN	Emails to legal team re motion for preliminary approval and supporting papers.	0.2	
3/18/2016	MSN	Emails to legal team re possible additional issues re injunctive relief to raise with op. counsel.	0.2	
3/18/2016	MSN	Review current draft of settlement agreement and make a number of revision throughout agreement to address minor issues identified while drafting motion for preliminary approval.	1.3	
3/19/2016	MSN	Proof read settlement agreement, Revise reporting section, and draft email to legal team with updated agreement and explanation of changes since last version circulated.	1.3	
3/20/2016	MWB	Review and reply to MN email re changes to settlement agreement.	1.0	
3/20/2016	MSN	Review and respond to email from MWB re edits to Mtn. for preliminary approval.	0.1	
3/20/2016	MSN	Review revisions from DRA to mtn. for preliminary approval.	0.3	
3/21/2016	MWB	Emails TE-AS re blocking.	0.2	
3/21/2016	MWB	Telephone conferences and emails re settlement agreement and preliminary approval motion.	0.5	
3/21/2016	MWB	Emails re negotiations and strategy.	0.3	
3/21/2016	MWB	Conference with MN re preliminary approval motion and f/u.	0.3	
3/21/2016	MSN	Review team track change revisions to mtn. for preliminary approval, and begin to make revisions to document accordingly.	1.0	
3/21/2016	MSN	Make additional revisions to proposed order and circulate to legal team.	0.5	
3/21/2016	MSN	Call with T. Elder re revisions to settlement agreement.	0.2	
3/21/2016	MSN	Additional revisions to settlement agreement based on MWB and T. Elder feedback, proof read settlement agreement, draft email to legal team re updated settlement agreement.	1.1	

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Date	Person	Description of Services	Hours	Discount
3/21/2016	MSN	Call with MWB re notice issue raised by L. Paradis and re revisions to settlement agreement, timing of filing for preliminary approval.	0.2	
3/22/2016	MWB	Emails TE-MN-Team re negotiations and strategy.	1.0	
3/22/2016	MSN	Review and respond to team emails re strategy on pair blocking issue.	0.1	
3/22/2016	MSN	Additional revisions to proposed order granting preliminary approval.	0.4	
3/22/2016	MSN	Further edits to joint motion for preliminary approval.	3.5	
3/22/2016	MSN	Additional minor revisions to settlement agreement.	0.1	
3/22/2016	GZG	(No Charge) Saved documents to database; emailed MSN re same.	0.0	0.2
3/23/2016	MWB	Emails re settlement and preliminary approval motion.	1.0	
3/23/2016	MWB	Review and revise motion for preliminary approval.	1.0	
3/23/2016	MSN	Review LP edits to proposed preliminary approval order, accept redline edits, make additional minor revisions, and circulate same to legal team.	0.4	
3/23/2016	MSN	Review and accept LP revisions to mtn. for preliminary approval, and then proof read first half of mtn. for preliminary approval, making handful of corrections.	1.4	
3/23/2016	MSN	Confer with MWB re schedule for filing mtn. for preliminary approval.	0.2	
3/23/2016	MSN	Finish proof reading draft motion for preliminary approval, and email to legal team re same.	0.8	
3/23/2016	MSN	Review and further revise draft preliminary approval order, and email to legal team.	0.3	
3/23/2016	MSN	Finalize proposed preliminary approval motion and proposed preliminary approval order, correcting a couple of additional typos and updating caption page, and draft email to op. counsel re same.	0.6	
3/23/2016	MSN	Emails with JZM re comparing current draft of settlement agreement against last version circulated to defs.	0.2	
3/23/2016	MSN	Emails with legal team re revisions to settlement agreement, and complete revisions so discussed.	0.3	
3/23/2016	MSN	Confer with paralegal re CAFA notice cost estimate.	0.1	
3/23/2016	MSN	Email to legal team and KCC re settlement website.	0.2	

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Date	Person	Description of Services	Hours	Discount
3/23/2016	MSN	Email to JZM re info for Nunez decl. ISO preliminary approval.	0.1	
3/23/2016	MSN	Review and revise class notice, and emails to legal team re same.	0.5	
3/23/2016	MSN	Call with T. Elder re settlement agreement, class notice, and filing schedule.	0.2	
3/23/2016	MSN	Emails to legal team re revisions to draft class notice.	0.3	
3/23/2016	MSN	Begin to draft Nunez Decl. ISO motion for preliminary approval.	1.7	
3/23/2016	MSN	Review emails from legal team re revisions to settlement agreement, revise and finalize settlement agreement for transmission to Defs., and draft email to Defs explaining substantive changes in Agreement.	0.6	
3/24/2016	MWB	Emails and telephone conferences re motion for preliminary approval and related documents.	1.0	
3/24/2016	MWB	(No Charge) Emails and review stip re extension.	0.0	0.5
3/24/2016	MSN	Continue to draft Nunez Decl. ISO motion for preliminary approval.	2.0	
3/24/2016	MSN	Review and further revise class notice, emails to legal team re same.	0.4	
3/24/2016	MSN	Email to op. counsel re settlement administrator, CAFA notice, settlement website.	0.1	
3/24/2016	MSN	Continue to draft Paradis decl. ISO mtn. for preliminary approval (changing decl. so that it is from Paradis rather than Nunez).	0.8	
3/24/2016	MSN	Review scheduling stipulation and accompanying decl., and email to co-counsel re same.	0.4	
3/24/2016	MSN	Finish initial drafting of Paradis Decl. ISO motion for preliminary approval.	2.1	
3/24/2016	MSN	Fact research re number of potential class members.	0.2	
3/25/2016	MWB	Review and revise Paradis Decl.	1.0	
3/25/2016	MWB	Emails re strategy and filing.	0.5	
3/25/2016	MWB	Telephone conferences and emails re Press.	0.5	
3/25/2016	MSN	Review updated quote from KCC including CAFA notice, and email to legal team.	0.2	
3/25/2016	MSN	Review and revise draft Paradis Decl. ISO mtn for preliminary approval, and email to legal team.	2.3	

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Date	Person	Description of Services	Hours	Discount
3/25/2016	MSN	Email to legal team re class notice.	0.1	
3/25/2016	MSN	Emails to CCB with questions re ACB email lists.	0.2	
3/25/2016	MSN	(No Charge) Confer with legal team re logistics for filing approval papers next week.	0.0	0.2
3/25/2016	MSN	Email to op. counsel re settlement administrator handling CAFA and settlement website.	0.1	
3/25/2016	MSN	Emails to legal team re notice, update notice, and draft email to A. Spurchase re same.	0.4	
3/25/2016	MSN	Review emails from legal team re Paradis declaration, and revise draft declaration re same.	2.0	
3/25/2016	GZG	(No Charge) Saved filed pleadings to database, emailed team re same; organized documents on database.	0.0	0.2
3/25/2016	GZG	(No Charge) Emails w/MSN re MWB resume for filing.	0.0	0.2
3/26/2016	MSN	Review additional input from team re Paradis Decl, Review RBGG class actions, and revise Paradis decl. accordingly.	1.5	
3/27/2016	MWB	Review and revise Paradis Declaration and emails re same.	0.5	
3/27/2016	MSN	Look for additional case info for Paradis decl. re RBGG class actions to support RBGG adequacy, add info into declaration, proof read declaration, and draft email to legal team re same.	1.4	
3/28/2016	MWB	Emails re Press Plan and release.	0.5	
3/28/2016	MSN	Emails to legal team re revisions to Paradis decl. ISO preliminary approval, and additional revisions re same.	1.7	
3/28/2016	MSN	Review emails from legal team re press strategy re filing for preliminary approval, and email to C. Whitaker re summary of settlement.	0.2	
3/28/2016	MSN	Begin reviewing and revising SAC.	0.8	
3/29/2016	MWB	Emails re Paradis Decl, filing, AS response, press.	0.5	
3/29/2016	MSN	Review and revise Paradis Decl. ISO mtn. preliminary approval.	0.5	
3/29/2016	MSN	Review and revise draft press release, and draft emails to legal team re same.	0.5	
3/29/2016	MSN	Continue to review and revise SAC through end of first cause of action.	1.0	
3/29/2016	MSN	Review client declarations ISO preliminary approval, and email to JZM re same.	0.4	
3/30/2016	MWB	Emails re press, settlement and filing.	0.5	

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3/30/2016	MWB	Emails MN-AS-Team re filing.	0.3	
3/30/2016	MSN	Finish reviewing and revising SAC, and draft email to legal team re same.	0.7	
3/30/2016	MSN	Review and respond to emails from legal team re filing schedule.	0.3	
3/30/2016	GZG	(No Charge) Rescheduled CMC; downloaded updated docket sheet to database; emailed MSN re same.	0.0	0.2
3/31/2016	MWB	Emails and telephone conferences re settlement process and filing.	0.5	
3/31/2016	MWB	Meeting with LP, TE and MN re strategy.	0.5	
4/1/2016	MWB	Conferences with MN, LP, TE and telephone conferences and emails AS re motion for preliminary approval.	1.0	
4/1/2016	MWB	Emails with AS and begin review of Uber changes.	0.5	
4/4/2016	MWB	Emails LP-TE re Uber revisions to addendums and CMC.	1.0	
4/4/2016	MWB	Telephone conference with LP re status.	0.3	
4/4/2016	MWB	Emails AS re CMC and settlement.	0.3	
4/4/2016	MSN	Review emails from legal team re revisions to Addendum 3 and Addendum 5, and respond to same.	1.0	
4/5/2016	MWB	Emails Team and AS re CMC and settlement.	0.5	
4/5/2016	MWB	Conference call with Team re strategy, settlement and CMC.	1.0	
4/5/2016	MWB	Work on settlement.	0.5	
4/5/2016	MSN	Draft emails to legal team re prep for CMC and CMC statement.	0.2	
4/5/2016	MSN	Review revised CMC statement, and draft email to legal team re same.	0.1	
4/5/2016	MSN	Review Uber revisions to Addendums 3 and 5, and draft email to legal team re same.	0.3	
4/5/2016	MSN	Team strategy call re CMC, discovery, preliminary approval filing schedule.	0.6	
4/5/2016	MSN	Prep proposed schedule for discovery/trial, and draft email to legal team re same and re prior litigation schedule.	0.5	
4/5/2016	KES	(No Charge) Download and circulate CMC statement.	0.0	0.1
4/6/2016	MSN	Review order re CMC hearing, and TRE summary of hearing.	0.2	
4/8/2016	MWB	Emails Team-AS re class notice changes.	0.5	

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Date	Person	Description of Services	Hours	Discount
4/8/2016	MSN	Review op. counsel revisions to draft class notice, and make additional revisions and comments, and email to legal team.	1.1	
4/8/2016	MSN	Confer with C. Whitaker re settlement schedule, press outreach plan.	0.1	
4/8/2016	MSN	Trade draft revisions of class notice with co-counsel.	0.5	
4/8/2016	MSN	Skim order denying approval of proposed class settlement in Cotter v. Lyft, and emails from legal team re same for our settlement.	0.2	
4/10/2016	MWB	Emails AS-Team re 2nd Amended Complaint.	0.2	
4/11/2016	MWB	Emails LP re Uber delays and strategy.	0.3	
4/11/2016	MWB	Emails re Uber changes to 2nd AC.	0.5	
4/11/2016	MSN	Emails to legal team re revisions to draft SAC, and review and further revise draft SAC.	1.4	
4/11/2016	MSN	Review and make further revisions to class notice, and email to legal team re same.	0.4	
4/11/2016	MSN	Additional emails to legal team re revisions to documents.	0.2	
4/11/2016	GZG	(No Charge) Saved filed pleadings to database; updated filed pleadings folder.	0.0	0.4
4/12/2016	MWB	Review final proposed order.	0.2	
4/12/2016	MWB	Emails AS-Team re final changes to documents.	0.3	
4/12/2016	MWB	Emails with Team-AS re settlement.	1.0	
4/12/2016	MSN	Review emails from legal team re revisions to settlement agreement.	0.2	
4/12/2016	MSN	Review updated proposed class notice, make additional revisions, and email to legal team re same.	0.2	
4/13/2016	MWB	Emails with Team-AS re changes to settlement documents.	1.0	
4/13/2016	MSN	Review email from A. Spurchise, and draft email to legal team re same.	0.2	
4/13/2016	MSN	Email to legal team re accessibility of documents for settlement website.	0.1	
4/13/2016	MSN	Review and respond to email from legal team re modifying/truncating intake procedures after filing for preliminary approval.	0.2	
4/13/2016	MSN	Email to KCC re settlement website.	0.1	

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Date	Person	Description of Services	Hours	Discount
4/14/2016	MWB	Emails re filing, settlement.	0.5	
4/14/2016	MSN	Review and revise current Paradis declaration to make it consistent with additional substantive and stylistic changes that parties agreed to for other settlement papers, and research and add in additional information re notice plan.	2.5	
4/14/2016	MSN	Add additional revisions to proposed class notice, and email to legal team re same.	0.2	
4/14/2016	MSN	Emails with op. counsel, KCC, and legal team re settlement website.	0.2	
4/15/2016	MWB	Emails Team-AS re settlement docs.	0.5	
4/15/2016	MSN	Review and respond to emails from legal team re responding to Uber's revised proposed Addendum 4 re complaint forms.	0.1	
4/15/2016	MSN	Review and respond to MWB inquiry re status of negotiations.	0.1	
4/17/2016	MWB	Emails re settlement and finding docs.	0.5	
4/18/2016	MWB	Emails re Uber communications.	0.5	
4/18/2016	MWB	Conference MN re strategy.	0.2	
4/18/2016	MSN	Emails to legal team re prep for upcoming CMC.	0.2	
4/19/2016	MWB	Emails Team-Uber re CMC, settlement.	0.5	
4/19/2016	MWB	Conference call with Team re strategy.	1.0	
4/19/2016	MSN	Review current draft of Addendum 4, draft email to op. counsel re same and send.	0.3	
4/19/2016	MSN	Review and draft email to legal team re Uber's position on pair blocking issue.	0.1	
4/19/2016	MSN	(No Charge) Call with courtroom deputy re logistics for CMC, and email to legal team re same.	0.0	0.2
4/19/2016	MSN	Call with E. O'Conner re CMC and status of settlement docs.	0.2	
4/19/2016	MSN	Team call re prep for strategy session.	0.5	
4/19/2016	MSN	Prep for afternoon call re prep for telephonic CMC.	0.1	
4/19/2016	MSN	Prep notes for Apr. 20 CMC hearing.	0.5	
4/20/2016	MWB	Telephone conference and email MN re CMC, strategy and trial setting.	0.5	
4/20/2016	MSN	Call with J. Marks re prep to draft joint pretrial schedule with for cause arguments, and to confer re disputes to include in revised discovery letter brief.	0.5	

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Date	Person	Description of Services	Hours	Discount
4/20/2016	MSN	Review case notes re history of discovery, review Defendants' objections to plaintiffs' discovery requests, and draft two emails to legal team re next steps re joint discovery letter brief.	0.5	
4/20/2016	MSN	Draft email to legal team re strategy re discovery and pretrial schedule.	0.2	
4/20/2016	MSN	Review notes re proposed trial schedule, outstanding discovery, discovery disputes, status of settlement papers, and CMC topics for upcoming CMC hearing.	1.0	
4/20/2016	MSN	Appear for CMC before Judge Cousins.	0.4	
4/20/2016	MSN	Call with T. Elder re CMC hearing and next steps.	0.3	
4/20/2016	MSN	Call with MWB re summary of CMC hearing.	0.1	
4/20/2016	MSN	Draft several emails to legal team re next steps in light of CMC hearing.	0.4	
4/20/2016	MSN	Draft email to op. counsel re meet and confer re discovery.	0.1	
4/20/2016	GZG	(No Charge) Downloaded filed pleading to database; calendared upcoming deadlines; emailed team re same.	0.0	0.3
4/21/2016	MWB	Telephone conference and emails MN-LP re discovery disputes.	0.4	
4/21/2016	MSN	Call with M. Bien, and second call to J. Marks re prep for discovery dispute letter brief.	0.2	
4/21/2016	MSN	Review defendants objections to Plaintiffs' second and third set of RFPs, and begin to draft letter re discovery disputes to Uber.	2.0	
4/22/2016	MWB	Emails re Uber driver settlement and implications.	0.5	
4/22/2016	MWB	Review and revise discovery letter to AS.	0.5	
4/22/2016	MSN	Review emails from legal team re revisions to draft discovery meet and confer letter, make revisions to letter re same, oversee finalizing letter, and draft email to A. Spurchase re same.	0.6	
4/22/2016	MSN	Finish drafting discovery dispute letter and circulate to legal team for review.	2.0	
4/22/2016	MSN	Review and respond to email from co-counsel re strategy re following up with Uber re plaintiffs interested in filing.	0.2	
4/22/2016	MSN	Emails with legal team re O'Connor settlement and impact on our case.	0.3	
4/25/2016	MWB	Emails MN-AS re meet and confer for discovery dispute.	0.2	

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Date	Person	Description of Services	Hours	Discount
4/25/2016	MSN	Prep for discovery meet and confer with Uber, and call to op. counsel re same.	1.4	
4/25/2016	MSN	Draft emails to op. counsel re discovery meet and confer.	0.1	
4/26/2016	MWB	Conference with MN and email Team re strategy, settlement, discovery meet and confer.	0.5	
4/26/2016	MWB	Emails LP re Uber settlement.	0.2	
4/26/2016	MSN	Prep for meet and confer with op. counsel re discovery.	1.0	
4/26/2016	MSN	Call with co-counsel re prep for meet and confer with op. counsel re discovery, and call with op. counsel re meet and confer re discovery.	1.2	
4/26/2016	MSN	(No Charge) Call with co-counsel re next steps with discovery.	0.0	0.4
4/26/2016	MSN	Draft update email to legal team re settlement and discovery meet and confer.	0.2	
4/27/2016	MWB	Telephone conference with Team and emails re Uber settlement docs.	1.5	
4/27/2016	MWB	Emails with AS-Team re Uber final changes to settlement documents.	0.5	
4/27/2016	MSN	Review Addendums 1 and 3 to settlement agreement, and draft email to legal team re Uber's changes to same.	0.5	
4/27/2016	MSN	Draft emails to legal team re reviewing settlement docs from Uber with revisions.	0.2	
4/27/2016	MSN	Draft emails to op. counsel re Uber proposed revision to settlement agreement.	0.4	
4/27/2016	MSN	Review JZM notes from 4-26-16 meet and confer re discovery re prep for 4-28-16 meet and confer re discovery.	0.5	
4/27/2016	MSN	Email to legal team re strategy for 4-28-16 discovery meet and confer.	0.1	
4/27/2016	MSN	Review and respond to emails from co-counsel re impact of O'Connor Uber settlement on settlement in our case.	0.2	
4/28/2016	MWB	Emails AS-Team re settlement docs, discovery.	1.5	
4/28/2016	MWB	Telephone conference with LP re negotiations.	0.2	
4/28/2016	MWB	Telephone conference and conference with MN re settlement documents.	0.5	
4/28/2016	MSN	Review and further revise revised motion for preliminary approval from op. counsel, and circulate same to legal team.	1.3	

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Date	Person	Description of Services	Hours	Discount
4/28/2016	MSN	Draft email responding to case inquiry from reporter.	0.1	
4/28/2016	MSN	Email to legal team re revision proposed by op. counsel in Mtn. for preliminary approval to Section 8 of settlement agreement.	0.1	
4/28/2016	MSN	Review and respond to emails from legal team re concerns re Uber's proposed revision to draft settlement.	0.2	
4/28/2016	MSN	Prepare for discovery meet and confer with op. counsel re disputed issues, and conduct brief call with op. counsel re same and reschedule meet and confer call.	0.7	
4/28/2016	MSN	Review proposed order, prepare revised settlement schedule, and input additional revisions to proposed order re same.	1.0	
4/28/2016	MSN	Prep for rescheduled discovery meet and confer call with op. counsel, and make call and wait for op. counsel to join conference call (op. counsel did not join).	0.3	
4/28/2016	MSN	Emails to legal team re additional revisions to preliminary approval papers.	0.2	
4/28/2016	MSN	Review and respond to emails from legal team re revisions to release and driver contract arbitration provision.	0.3	
4/28/2016	MSN	Draft emails to legal team re proposed compromise on final settlement issue, and draft email to a. Spurchase re same.	0.4	
4/28/2016	MSN	Review and further revise Paradis Decl., and email to legal team.	0.4	
4/28/2016	MSN	Review and respond to emails re revisions to resolve minor inconsistencies across settlement papers and proposed order.	0.2	
4/28/2016	MSN	Review and respond to emails from legal team re press strategy.	0.3	
4/28/2016	MSN	Review and respond to emails from legal team re distribution of tasks re finalizing settlement papers for preliminary approval filing.	0.2	
4/28/2016	MSN	Add pin cites to supporting declarations into motion for preliminary approval, further revise Paradis declaration, proof read motion for preliminary approval and proposed order, and circulate order and Paradis declaration to legal team.	2.3	
4/28/2016	MSN	(No Charge) Send instructions re motion for preliminary approval to word processor.	0.0	0.1
4/29/2016	MWB	Emails and telephone conferences with MM-AS-Team re settlement.	2.0	

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Date	Person	Description of Services	Hours	Discount
4/29/2016	MWB	Emails and conferences with MM-Team re details of settlement and filing.	1.0	
4/29/2016	MSN	(No Charge) Confer with word processor re TOA and TOC for motion for preliminary approval.	0.0	0.1
4/29/2016	MSN	Draft admin motion and PO re exceed page limits, and send to word processor with instructions.	1.0	
4/29/2016	MSN	Review formatted admin motion for page extension, and email to co-counsel.	0.2	
4/29/2016	MSN	Review edits from co-counsel on motion for admin relief re exceed page numbers, further revise, and send to op. counsel for review.	0.3	
4/29/2016	MSN	Make change to admin motion re exceed page limits requested by op. counsel, add in filer's attestation, and send to word processor with instructions re formatting, and email to legal team.	0.1	
4/29/2016	MSN	Review updated motion for preliminary approval with TOC and TOA, and draft email to co-counsel re same.	0.3	
4/29/2016	MSN	Field several calls from J. Marks with questions re finalizing preliminary approval filing and settlement agreement.	0.5	
4/29/2016	MSN	Call with M. Hingson re discuss substance of final settlement and getting his signature page for settlement.	0.2	
4/29/2016	MSN	Email to op. counsel re Uber signature page for settlement.	0.1	
4/29/2016	MSN	Second email to op. counsel re Uber's signature page for settlement.	0.1	
4/29/2016	MSN	Draft several emails to M. Pedersen re obtaining his signature page on the settlement agreement, confer with paralegal re same.	0.3	
4/29/2016	MSN	Draft email to co-counsel re exhibits to Paradis declaration ISO motion for preliminary approval.	0.1	
4/29/2016	MSN	Review and revise media talking points and circulate to legal team and to press staff.	0.5	
4/29/2016	MSN	Call with Ben Hancock from The Recorder re settlement.	0.3	
4/29/2016	MSN	Draft two emails to JZM responding to questions re details re revisions to preliminary approval papers.	0.2	
4/29/2016	MSN	Call to JZM and email to JZM re responding to her questions re finalizing and filing settlement papers.	0.2	

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4/29/2016	MSN	Review emails from op. counsel re revisions to press release, review proposed revisions, draft emails to legal team re same, and draft email to op. counsel re same.	0.6	
4/29/2016	MSN	Review final PDFs of motion for prelim approval, proposed scheduling order, settlement agreement, and Paradis declaration; calls with JZM re same.	1.7	
4/29/2016	GZG	(No Charge) Discussion w/MSN re settlement signature from client.	0.0	0.1
4/29/2016	GZG	(No Charge) Met w/client Pedersen to obtain signature on settlement agreement; scanned same & sent to MSN.	0.0	0.6
4/29/2016	GZG	(No Charge) Filed Joint Administrative Motion to Exceed Number of Pages in Joint Motion for Prelim Approval; emails w/MSN re same; emailed Court re same; saved filed pleadings to database.	0.0	0.7
4/30/2016	EG	(No Charge) handling web posting of uber settlement info.	0.0	0.7
4/30/2016	MWB	Settlement and Press issues.	1.0	
4/30/2016	MSN	Review emails from legal team re press on case and re typographical error in preliminary approval filing.	0.3	
4/30/2016	MSN	(No Charge) Review and respond to emails from partners re press release.	0.0	0.1
5/2/2016	MSN	Draft emails to co-counsel re courtesy copies of preliminary approval filing.	0.1	
5/2/2016	GZG	(No Charge) Saved all filed pleadings filed on Friday evening to database; emailed team re same.	0.0	0.5
5/3/2016	MWB	Review Court Order re Motion for Prel Approval.	0.2	
5/3/2016	MSN	Review letter to Commission on Disability Access, and draft email to co-counsel re same.	0.2	
5/3/2016	GZG	(No Charge) Calendared new date set by MJ Cousins for Joint Motion for Prelim Approval of Class Settlement; saved doc re same to database.	0.0	0.1
5/4/2016	MSN	(No Charge) Provide instructions to paralegal re updating case calendar.	0.0	0.1
5/6/2016	MWB	Emails re client signatures.	0.1	
5/9/2016	EG	(No Charge) review and respond to email re DOJ comment on settlement of Uber.	0.0	0.2

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5/9/2016	MSN	Review docket entry requesting DOJ comment on settlement, and draft emails with legal team re arrange call with DOJ re proposed settlement.	0.2	
5/9/2016	GZG	(No Charge) Saved filed pleading to database; calendared new deadline; emailed team re same.	0.0	0.2
5/11/2016	MWB	Emails Team re DOJ conference call.	0.3	
5/11/2016	MSN	Emails with co-counsel re call with DOJ re settlement.	0.1	
5/11/2016	GZG	(No Charge) Saved Clerk's notice to database; calendared re same.	0.0	0.2
5/16/2016	MWB	Emails with DOJ call.	0.2	
5/17/2016	MWB	Emails re DOJ call.	0.4	
5/17/2016	MWB	Review articles re Uber driver action objections and emails.	0.3	
5/17/2016	MSN	Call with DOJ re questions re Uber settlement.	0.7	
5/17/2016	MSN	Draft summary of call with DOJ re settlement and send to M. Bien.	0.4	
5/23/2016	MWB	Emails with JM-Team re accessibility of posted documents.	0.2	
5/23/2016	MSN	Draft email response to inquiry from DOJ re final approval, and draft email to legal team re same.	0.2	
5/23/2016	GZG	(No Charge) Saved filed pleading to database; emailed team re same.	0.0	0.1
5/24/2016	MWB	(No Charge) Conference with MN re 9th Circuit decision re MJ appeal.	0.0	0.2
5/24/2016	MSN	Review and respond to email from J. Marks with several logistics questions re accessibility of documents that we post on settlement website.	0.4	
5/27/2016	MWB	Emails re continuing issues with Uber denials of class members.	0.2	
5/28/2016	MSN	Review and respond to emails from legal team re additional intake complaints and new Uber service.	0.4	
5/31/2016	MWB	Review MN email re negotiations and specific examples of client problems.	0.3	
6/1/2016	MWB	(No Charge) Emails Team re MJ issue in 9th Circuit.	0.0	0.2
6/2/2016	MWB	(No Charge) Conference with MN re MJ issue.	0.0	0.1
6/2/2016	MWB	Conference with MN re prep for preliminary approval hearing, notice and fees issues.	0.7	

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Date	Person	Description of Services	Hours	Discount
6/2/2016	MSN	Confer with MWB re prep for preliminary approval hearing.	0.8	
6/2/2016	GZG	(No Charge) Saved & routed filed pleading.	0.0	0.1
6/3/2016	MSN	Draft email to legal team re guide dog discrimination suit in VA.	0.1	
6/7/2016	MWB	Review US DOJ comments on settlement.	0.1	
6/7/2016	MWB	(No Charge) Conference with MN.	0.0	0.1
6/12/2016	MWB	Emails re VA guide dog case.	0.2	
6/13/2016	MSN	(No Charge) Confer with intern re logistics for preliminary approval hearing.	0.0	0.1
6/14/2016	MWB	Prepare for preliminary approval hearing.	0.5	
6/14/2016	MWB	Telephone conference and emails MN re hearing prep and strategy.	0.5	
6/14/2016	MSN	Draft email to legal team re prep for preliminary approval hearing.	0.4	
6/14/2016	MSN	Draft email to Carl W. re press on preliminary approval hearing.	0.1	
6/15/2016	MWB	Emails MN-LP-TE re prep for preliminary approval hearing.	0.5	
6/15/2016	MSN	(No Charge) Review NDCA class settlement guidance, notes from meeting re preliminary approval with MWB, and draft notes for hearing.	0.0	2.5
6/15/2016	MSN	Continue to prepare for preliminary approval hearing; draft notes re NDCA guidance for class settlements, review Churchill fairness factors, review case law re multipliers.	5.5	
6/15/2016	MSN	Continue to prepare for preliminary approval hearing; Draft intro and notes re summary of injunctive relief in settlement, practice statements and addressing relevant issues orally.	3.0	
6/15/2016	GZG	(No Charge) Saved filed pleading re settlement hearing; calendared re same.	0.0	0.2
6/16/2016	MWB	Emails re prep for hearing, CAFA, other matters.	1.0	
6/16/2016	MWB	Email re Hearing outcome and f/u.	0.3	
6/16/2016	MSN	Continue to prepare for preliminary approval hearing: review case law re magistrate power to approve class settlements and draft notes for hearing re same, review case law re class certification and draft notes re same, and practice addressing these issues orally.	3.0	
6/16/2016	MSN	Travel to preliminary approval hearing, confer with legal team re prep for hearing, appear at hearing, and travel back to office.	3.0	

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6/17/2016	MWB	Email with LP-Team re f/u projects from preliminary hearing.	0.5	
6/17/2016	EMA	Research re: state law injunctive relief and ADA.	3.1	
6/17/2016	EMA	(No Charge) Assignment conversation for research on state law injunctive relief.	0.0	0.3
6/17/2016	MSN	Call with Da Hae at co-counsel re research strategy for supplemental brief ISO mtn prelim approval.	0.2	
6/17/2016	MSN	Meeting with Eric Anderson re research for supplemental brief ISO prelim approval.	0.2	
6/17/2016	MSN	Draft update email to legal team re research strategy re supplemental brief ISO mtn prelim approval.	0.2	
6/17/2016	MSN	Draft email to co-counsel re research re state disability laws for supplemental brief ISO prelim approval.	0.2	
6/17/2016	MSN	Draft emails to legal team re research for supplemental brief ISO preliminary approval.	0.5	
6/18/2016	MWB	Email re class notice, fees and f/u from hearing.	0.2	
6/18/2016	MWB	Email with class member re discrimination.	0.2	
6/19/2016	MWB	Emails with Team re f/u from Hearing and survey of state laws.	0.2	
6/19/2016	MWB	Emails re scheduling conference call.	0.2	
6/20/2016	MWB	Prepare for and participate in Team telephone conference re f/u from preliminary approval hearing and projects.	0.6	
6/20/2016	EMA	Research re: scope of state law injunctive relief.	6.8	
6/20/2016	EMA	(No Charge) Coordination call re: state law injunctive relief research.	0.0	0.5
6/20/2016	MSN	Draft emails to MWB re arranging strategy call re supplemental briefing ISO preliminary approval.	0.2	
6/20/2016	MSN	Strategy call with legal team re supplemental briefing ISO preliminary approval.	0.5	
6/20/2016	MSN	Review schedule, and revise proposed order and circulate to legal team.	0.8	
6/21/2016	MWB	Emails re proposed order and response to MJ Cousins requests.	0.3	
6/21/2016	MWB	Conference with MN re response to Cousins, LR.	0.1	
6/21/2016	MWB	Review DOJ service animal complaint.	0.2	
6/21/2016	EMA	Research re: state and local law injunctive relief.	6.6	

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6/21/2016	MSN	Research city disability access laws in San Antonio and Phoenix re supplemental briefing ISO preliminary approval.	3.5	
6/21/2016	MSN	Draft email to intern re researching additional city ordinances re supplemental briefing.	0.1	
6/22/2016	EMA	Research re: state and local injunctive relief.	2.1	
6/22/2016	MSN	Research San Diego disability public accommodations ordinances.	1.8	
6/22/2016	MSN	Review notes from T. Elder re publication schedule for Braille Monitor, review NDCA class settlement guidance, and settlement agreement schedule for notice, objections, and responses to objections, and prepare updated proposed schedule, and draft lengthy email to legal team explaining concerns re same.	1.0	
6/22/2016	MSN	Finish researching local ordinances, draft memo re same, and draft email to JZM re same.	2.8	
6/22/2016	MSN	Draft emails to legal team re additional research re local ordinances.	0.1	
6/23/2016	MWB	Review and revise Brief and declaration re state and local laws.	1.0	
6/23/2016	MWB	Emails re Uber's change to released entities and review Uber's proposal.	0.5	
6/23/2016	MWB	Meeting with MN re Proposed Order and other issues.	1.0	
6/23/2016	MWB	Conference call with Team re Proposed Order and strategy.	0.6	
6/23/2016	MSN	Review and revise draft supplemental brief ISO preliminary approval and supporting declaration, and draft email to legal team re same.	0.6	
6/23/2016	MSN	Ccall with legal team re strategy re supplemental briefing ISO preliminary approval and schedule for final approval.	0.6	
6/23/2016	MSN	Draft email to op. counsel re conferring re supplemental materials and revised schedule, Review notes re same, call with E. O'Connor re conferring re supplement materials and amended proposed order, and draft email to legal team re same.	1.5	
6/23/2016	MSN	Draft scheduling stipulation to extend deadline to file supplemental materials ISO preliminary approval.	0.6	
6/23/2016	MSN	Review scheduling stipulation extending deadline to file supplemental materials from defs, and draft email to defs re same.	0.2	

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6/23/2016	MSN	Further revise amended proposed scheduling order, and draft email to legal team re same.	0.4	
6/24/2016	MWB	Review court order re extension.	0.1	
6/24/2016	MWB	Review and revise draft proposed order and emails with Team.	0.5	
6/24/2016	MWB	Conference with VS re Rule 26 strategy, discovery and settlement.	0.5	
6/24/2016	MSN	Draft stipulation re modification of final approval schedule and procedures re distribution of notice, and email to legal team.	0.7	
6/24/2016	MSN	Review and revise updated amended proposed order from DRA, draft emails to legal team re same, and draft emails to op. counsel re same.	0.5	
6/24/2016	GZG	(No Charge) Saved multiple filed pleadings to database.	0.0	0.4
6/26/2016	MWB	Emails Team re Stipulation, proposed order.	0.3	
6/27/2016	MWB	Emails Team-Uber re stipulation, proposed order, release.	0.7	
6/27/2016	MSN	Review team revisions to stipulation re proposed final approval schedule and modifications to proposed procedures for distribution of notice, revise same, email legal team re same, and draft email to Defendants re same.	0.7	
6/27/2016	MSN	Review email from op. counsel, and draft several emails to legal team re response to same.	0.5	
6/27/2016	MSN	Draft emails to op. counsel and legal team re Uber's proposed supplemental letter brief ISO preliminary approval.	0.4	
6/27/2016	MSN	Work to finalize supplemental filing re proposed order and stipulation, trade emails with co-counsel re same, trade emails with Defendants re same.	2.0	
6/28/2016	MWB	Emails re release, amended proposed order and Joint Stipulation.	1.0	
6/28/2016	MSN	Draft emails to legal team and op. counsel re arranging call to discuss finalizing filing.	0.2	
6/28/2016	MSN	Trade emails with legal team and opp counsel re finalizing proposed order, stipulation, and Uber supplemental brief, and draft revisions to these three documents re same.	1.0	
6/28/2016	MSN	Draft email to legal team re discrimination report from T. Foley.	0.1	
6/28/2016	MSN	Draft response to email from class member reporting discrimination.	0.3	

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6/28/2016	MSN	Draft email to Lighthouse re production of notice and settlement agreement in Braille.	0.2	
6/28/2016	MSN	Draft email to Defs re supplemental filing ISO preliminary approval.	0.2	
6/28/2016	MSN	Call with T. Elder re supplemental filing ISO preliminary approval.	0.1	
6/28/2016	MSN	Confer with MWB re supplemental filing ISO preliminary approval.	0.1	
6/28/2016	MSN	Draft emails to legal team re proposal re supplemental filings from Defendants, and revise stipulation and joint proposed order re same.	0.4	
6/28/2016	MSN	Draft email to op. counsel responding to proposal re filing of supplemental materials ISO preliminary approval.	0.2	
6/28/2016	MSN	(No Charge) Finalize proposed order and joint stipulation, and provide instructions to word processing re same.	0.0	0.3
6/28/2016	MSN	Review finalize stipulation and proposed order, and draft email to Defs re same.	0.2	
6/28/2016	MSN	(No Charge) Call and draft emails to op. counsel re finalizing stipulation and amended proposed order, and provide instructions to paralegal re same.	0.0	0.3
6/28/2016	MSN	(No Charge) Oversee filing of stipulation and joint amended proposed order granting approval of class settlement etc.	0.0	0.4
6/28/2016	GZG	(No Charge) Saved filed pleadings to database.	0.0	0.1
6/28/2016	KES	(No Charge) Finalize and file stipulation and proposed orders; send Word versions.	0.0	0.7
6/29/2016	MWB	Emails re Braille notice.	0.1	
6/29/2016	MSN	(No Charge) Provide instructions to paralegal re chambers copies of stipulation and joint amended proposed order.	0.0	0.2
6/29/2016	MSN	Draft email to legal team re printing notice and settlement in Braille.	0.1	
6/29/2016	GZG	(No Charge) Saved multiple filed pleadings to database; emailed team re same.	0.0	0.2
6/29/2016	GZG	(No Charge) Sent chambers copies to Mag Judge Cousins; emails w/MSN re same.	0.0	0.5
6/30/2016	MSN	(No Charge) Review and respond to email from paralegal re chambers copies of stipulation and joint amended proposed order.legal team re logisticians for moot exercise.	0.0	0.1

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Date	Person	Description of Services	Hours	Discount
7/1/2016	GZG	(No Charge) Saved proof of delivery of chambers copies of Dkts 108 & 109.	0.0	0.1
7/11/2016	MWB	Review draft Stip responding to Judge's Question and emails re same.	0.5	
7/11/2016	MSN	Review draft stipulation re release and other changes to settlement, and draft email to legal team re same.	0.1	
7/11/2016	GZG	(No Charge) Saved Dkt 110 to database; routed same to team; calendared same.	0.0	0.2
7/12/2016	MWB	Emails with AS-EG re filing Stipulation with Court.	0.2	
7/12/2016	MSN	(No Charge) Review article circulated by MWB re Uber investigations of opposing counsel in litigation.	0.0	0.1
7/13/2016	GZG	(No Charge) Saved article to database.	0.0	0.1
7/14/2016	MWB	Review Court Order granting preliminary approval.	0.3	
7/14/2016	MWB	Emails re 2nd Amended Complaint and f/u issues.	0.2	
7/14/2016	MWB	Emails with Team re f/u projects to Order and Posting Notice.	0.5	
7/14/2016	MSN	Review court's order granting preliminary approval and related orders, and draft email to legal team re same.	0.5	
7/14/2016	MSN	Confer with MWB re press re granting of preliminary approval, and draft emails to legal team re same.	0.2	
7/14/2016	GZG	(No Charge) Downloaded filed pleading from ECF; routed to team.	0.0	0.1
7/15/2016	MWB	Emails re Notice, braille, postings.	0.2	
7/16/2016	MWB	Emails with Team re f/u on Notice and other issues.	0.2	
7/18/2016	MWB	Conference with MN and emails Team re Notice and web sites.	0.5	
7/18/2016	MSN	Review class notice, and draft email to co-counsel with question re same.	0.2	
7/18/2016	MSN	Review final settlement agreement, and draft email requesting quote for Braille production from Lighthouse.	0.3	
7/18/2016	MSN	Draft email to Patrick Ivy of KCC re settlement website and settlement documents.	0.4	
7/18/2016	MSN	Review final class notice, and draft email to Lighthouse requesting quote for Braille production.	0.2	
7/18/2016	MSN	Prep for call with AS re questions re settlement, and call and leave VM for AS.	0.2	

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7/18/2016	MSN	Review and respond to email from KCC re settlement website.	0.1	
7/18/2016	MSN	(No Charge) Confer with MWB re updating RBGG website with settlement docs, and draft email to Carl re same.	0.0	0.3
7/18/2016	MSN	Draft additional emails to KCC re settlement website.	0.1	
7/19/2016	MWB	Emails re posting settlement docs on web sites, compliance with Notice.	0.5	
7/19/2016	MSN	Review and respond to email from JZM e final settlement docs for website.	0.2	
7/19/2016	MSN	(No Charge) Call with Carl re draft webpage re Uber settlement.	0.0	0.2
7/20/2016	MSN	(No Charge) Review NFB-Uber settlement webpage on RBGG website and documents posted on webpage to ensure accuracy and accessibility.	0.0	1.0
7/20/2016	MSN	(No Charge) Continue to review docs on RBGG website re Uber settlement to ensure accessibility and accuracy.	0.0	0.3
7/20/2016	MSN	(No Charge) Finish reviewing docs on RBGG website re Uber settlement to ensure accessibility and accuracy.	0.0	0.2
7/21/2016	MWB	Emails re posting settlement docs on web sites re Notice.	0.1	
7/21/2016	MWB	Emails re completing tasks for for Notice and web sites.	0.2	
7/21/2016	MSN	Draft emails to T. Elder and Carl re docs for settlement website and class counsel websites.	0.1	
7/21/2016	MSN	Draft lengthy email to KCC re details for distribution of notice.	0.5	
7/21/2016	MSN	Draft additional email to KCC re updated docs for settlement website.	0.2	
7/21/2016	MSN	Draft additional emails to co-counsel and KCC re logistics for distribution of notice.	0.3	
7/21/2016	MSN	(No Charge) Draft emails to paralegal re documents for settlement website.	0.0	0.1
7/21/2016	MSN	Review Word and PDF versions of notice for publication in ACB Braille Forum from KCC, and draft email to JZM re same.	0.3	
7/21/2016	MSN	(No Charge) Review and respond to email from JZM re logistics for distribution of Uber notice.	0.0	0.2
7/21/2016	MSN	Review news articles covering preliminary approval of settlement circulated by co-counsel.	0.1	
7/21/2016	MSN	(No Charge) Draft paragraph describing case for firm website, and draft instructions for Carl re same.	0.0	0.2

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7/21/2016	MSN	Review and respond to email from KCC re class notice for publication through ACB Braille Forum.	0.1	
7/22/2016	MWB	Emails with LP-Team and review draft CAFA notice letter.	0.3	
7/22/2016	MWB	Review letter to clients and others and emails re same.	0.2	
7/24/2016	MWB	Email with MN re Braille production of Notice documents.	0.2	
7/24/2016	MSN	Review and respond to emails from legal team re draft email to individuals who reported discrimination by Uber drivers.	0.1	
7/24/2016	MSN	Review emails from legal team, op. counsel, and KCC re logistics for CAFA notice and settlement website.	0.2	
7/25/2016	MWB	Emails re Defendants' request to change Notice.	0.5	
7/25/2016	MWB	Conference with MN re f/u re Notice.	0.2	
7/25/2016	MSN	Call with KCC re defs' changes to class notice, review defs' proposed changes, and draft email to legal team re same.	0.2	
7/25/2016	MSN	Review and respond to email from F. Welte re price estimate for printing settlement docs in Braille.	0.2	
7/25/2016	MSN	Draft several emails to legal team and KCC re defs' proposed revisions to notice.	0.3	
7/25/2016	MSN	Draft emails to KCC and legal team re notice for publication in ACB Braille Forum.	0.1	
7/25/2016	MSN	Call with co-counsel re responding to op. counsel re proposed revisions to notice, and draft emails to legal team re same.	0.5	
7/26/2016	MWB	Email from MN-Gilardi re ACB approved notice.	0.1	
7/27/2016	MWB	Conference with MN re Notice issues.	0.1	
7/28/2016	MWB	Emails MN-JM re Notice issues.	0.2	
7/28/2016	MSN	Draft email to J. Thom and K. Charlson at ACB re distribution of notice of proposed settlement.	0.3	
7/28/2016	MSN	Draft emails to K. Charlson and E. Bridges re circulating notice of proposed settlement to ACB email lists.	0.2	
7/28/2016	MSN	Review and respond to email from E. Bridges of ACB re distributing notice of proposed settlement to ACB email lists.	0.1	
7/28/2016	MSN	Review demo version of settlement website, and draft email to co-counsel re issues to address with KCC re same.	1.0	
7/28/2016	MSN	Review and respond to email from J. Marks re action items to comply with notice plan.	0.2	

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Date	Person	Description of Services	Hours	Discount
7/28/2016	VS	(No Charge) Conf w/ M. Nunez re: reviewing billing records and exemplar fees motions.	0.0	0.5
7/30/2016	MWB	Emails with TE-MN re accessibility of web site.	0.2	
7/31/2016	MSN	Review and respond to email from co-counsel re corrections necessary for settlement website.	0.2	
8/2/2016	MWB	Review MN email re Uber request for Photos.	0.1	
8/2/2016	MSN	Call with blind individual denied access by Uber driver re inquiry re status of settlement.	0.3	
8/2/2016	MSN	Draft emails to KCC re settlement website.	0.1	
8/2/2016	MSN	Draft email to ACB re distribution of notice through email lists.	0.1	
8/2/2016	MSN	Draft email to legal team re pictures for Uber popup requested by op. counsel. I re schedule for drafting mediation brief.	0.1	
8/2/2016	MSN	Draft emails to paralegal re follow up with blind complainant re report of denial of service.	0.1	
8/2/2016	KES	Email MN re intake.	0.1	
8/3/2016	MWB	Emails re notice posting and Uber.	0.2	
8/3/2016	MSN	Review emails from ACB, and draft email to legal team confirming distribution of notice to ACB email lists.	0.1	
8/3/2016	MSN	(No Charge) Provide instructions to staff re updating master caption re death of L. Paradis.	0.0	0.1
8/3/2016	KES	Review email regarding new complaint; review settlement information and intake form.	0.6	
8/4/2016	MWB	(No Charge) Emails re notice.	0.0	0.1
8/4/2016	MSN	(No Charge) Draft email to legal team re updating contact info for class counsel given death of LP.	0.0	0.1
8/5/2016	MWB	Emails re service dog photos.	0.1	
8/5/2016	MSN	Draft emails to T. Elder and K. Stilber re report of discrimination from class member.	0.1	
8/5/2016	MSN	(No Charge) Draft email to legal team re updating class notice re death of LP.	0.0	0.1
8/5/2016	MSN	(No Charge) Call with co-counsel re changing class notice.	0.0	0.2
8/5/2016	MSN	(No Charge) Draft emails to legal team re making changes to website to account for passing of LP.	0.0	0.2

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SERVICES

Date	Person	Description of Services	Hours	Discount
8/5/2016	MSN	(No Charge) Review draft stipulation re amending class notice, and draft email to legal team re same.	0.0	0.1
8/5/2016	MSN	Call with co-counsel re updating intake procedures for blind individuals reporting discrimination when using Uber.	0.3	
8/5/2016	MSN	(No Charge) Review updated intake procedures with K. Stilber.	0.0	0.3
8/5/2016	GZG	(No Charge) Saved filed pleadings to database; routed same to team.	0.0	0.2
8/5/2016	KES	(No Charge) Review emails re new complaints.	0.0	0.2
8/5/2016	KES	Review email from class member; review current intake procedures and spreadsheet and confer MN re same; tcs to 2 class members.	1.2	
8/8/2016	KES	TCs with class members and witnesses re Uber guide dog denial experiences; review emails re same.	1.6	
8/9/2016	MSN	Review Braille class notice and settlement agreements prepared by Lighthouse.	0.2	
8/9/2016	MSN	Draft email to legal team re Braille copies of settlement and notice.	0.1	
8/9/2016	KES	Update intake chart re tcs with class members and witnesses re denial experiences.	0.4	
8/10/2016	KES	Lengthy tc w/ class member re recent Uber denial; update information on master chart re same; follow up email re same.	0.9	
8/11/2016	MWB	Telephone conference and email MN re identifying candidates for Monitor.	0.2	
8/11/2016	MSN	Draft email to co-counsel re request for service animal pictures pursuant to settlement.	0.1	
8/11/2016	MSN	Draft email to team re selection of monitor.	0.2	
8/11/2016	KES	Follow up email to attorneys re class member conversation and questions.	0.2	
8/12/2016	MSN	Review and respond to inquiry re service animal photos from co-counsel.	0.2	
8/16/2016	MWB	Emails re fees motion.	0.3	
8/18/2016	MWB	Emails re fees motion and declarations.	0.2	
8/18/2016	KES	TC class member re denial of service incident and follow up email re same.	0.4	
8/19/2016	MWB	Review letter from Guide Dog Users and email Team.	0.2	

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SERVICES

Date	Person	Description of Services	Hours	Discount
8/22/2016	MWB	(No Charge) Emails re NFB retainer agreement.	0.0	0.1
8/22/2016	GZG	(No Charge) Saved letter from GDUI to database.	0.0	0.1
8/24/2016	MSN	Review billing summaries and time entries from DRA and RBGG.	0.2	
8/25/2016	MSN	Begin drafting letter responding to GDUI inquiry re enforcement practices in proposed settlement.	0.3	
8/26/2016	MWB	Emails with Team re draft settlement agreement.	0.3	
8/26/2016	MWB	Emails MN-JCL.	0.2	
8/29/2016	GZG	(No Charge) Emails & discussion w/EG re ordering transcript of MTD from 03/03/15; filed re same; emailed court reporter re same.	0.0	1.0
8/30/2016	MSN	Further revise letter responding to GDUI letter inquiry.	0.3	
8/31/2016	MSN	Draft email to legal team re class notice procedures and publication of notice in Braille Forum.	0.1	
9/1/2016	MSN	Finalize letter to GDUI responding to letter inquiry, and send email to GDUI re same.	0.2	
9/1/2016	KES	(No Charge) Mail copy of letter.	0.0	0.1
9/2/2016	KES	Research statistics regarding guide dog users.	2.0	
9/6/2016	MWB	Emails MN-clients re damages.	0.1	
9/6/2016	MWB	Review MN-JCL re settlement.	0.1	
9/6/2016	KES	Further research and draft memo re guide dog user statistics.	1.5	
9/7/2016	MSN	Review and respond to email from L. Gardner re discriminatory Uber experience.	0.1	
9/7/2016	GZG	(No Charge) Drafted & sent ltr & check to court reporter for transcript.	0.0	0.3
9/9/2016	MSN	Review email from LG re negative Uber experience, respond to LG email re same, and email to K. Stilber re same.	0.2	
9/9/2016	MSN	Additional emails back and forth with LG re denial of service from Uber and Uber's response to her complaint re same.	0.2	
9/9/2016	KES	Review email from class member and arrange for tc with same.	0.2	

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SERVICES

Date	Person	Description of Services	Hours	Discount
		Total Professional Services	741.9	130.9
		Total Professional Services Due		\$386,971.50

PERSON RECAP

Person	Actual Hours Billed	Hours Claimed	Rate	Total Amount
MWB Michael W. Bien	143.8	139.5	\$900.00	\$125,550.00
LAE Lisa A. Ells	1.7	0	\$600.00	\$0.00
EG Ernest Galvan	0.9	0	\$740.00	\$0.00
GCG Gay C. Grunfeld	0.2	0	\$790.00	\$0.00
EMA Eric Monek Anderson	19.4	18.6	\$275.00	\$5,115.00
AJF Aaron J. Fisher	0.3	0	\$575.00	\$0.00
MSN Michael S. Nunez	562.0	516.4	\$460.00	\$237,544.00
KSM Krista Stone-Manista	7.4	0	\$490.00	\$0.00
VS Van Swearingen	0.5	0	\$545.00	\$0.00
GZG Gregorio Z. Gonzales	123.5	58.3	\$275.00	\$16,032.50
FGL F. Gail LaPurja	2.9	0	\$275.00	\$0.00
KES Karen E. Stilber	10.2	9.1	\$300.00	\$2,730.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
4/23/2015	Westlaw research	\$18.07
4/29/2015	CANDC	\$2.00
4/29/2015	00PCL	\$0.20
4/30/2015	Westlaw research	\$5.50
5/4/2015	CANDC	\$4.00
5/19/2015	Westlaw research	\$9.77
5/24/2015	CANDC	\$0.70

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DISBURSEMENTS

Date	Description of Disbursements	Amount
5/27/2015	CANDC	\$0.70
5/28/2015	CANDC	\$1.40
6/2/2015	Pacer Service Center, CANDC	\$1.20
6/19/2015	Westlaw research	\$14.66
7/13/2015	Westlaw research	\$3.84
7/15/2015	Pacer Service Center, CANDC	\$0.90
7/20/2015	Westlaw research	\$8.96
7/21/2015	Westlaw research	\$10.24
7/22/2015	Westlaw research	\$8.96
7/24/2015	Westlaw research	\$35.83
7/26/2015	Westlaw research	\$6.40
7/27/2015	Westlaw research	\$19.19
7/30/2015	Pacer Service Center, CANDC	\$1.40
8/7/2015	Federal Express to Hon, Jamie Jacobs-May	\$12.64
8/26/2015	Westlaw research	\$5.48
9/18/2015	Pacer Service Center, CANDC	\$1.60
9/29/2015	Westlaw research	\$2.78
10/6/2015	Pacer Service Center, CANDC	\$0.70
10/28/2015	Pacer Service Center, CANDC	\$0.80
11/6/2015	Pacer Service Center, CANDC	\$0.80
11/6/2015	Westlaw research	\$1.52
11/11/2015	Westlaw research	\$7.10
11/12/2015	Pacer Service Center, CANDC	\$0.80
11/17/2015	Westlaw research	\$1.52
11/19/2015	Pacer Service Center, CANDC	\$1.60
11/22/2015	Westlaw research	\$34.95
11/24/2015	Westlaw research	\$0.51
11/25/2015	Westlaw research	\$0.51
11/26/2015	Westlaw research	\$3.55

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DISBURSEMENTS

Date	Description of Disbursements	Amount
11/27/2015	Westlaw research	\$3.55
11/29/2015	Westlaw research	\$3.04
12/16/2015	Pacer Service Center, CANDC	\$0.80
1/20/2016	Godspeed Courier Service, USDC, San Jose, 1/07/16	\$117.00
2/23/2016	Westlaw research	\$6.29
2/24/2016	Westlaw research	\$0.79
2/26/2016	Westlaw research	\$1.57
3/1/2016	Pacer Service Center, CANDC	\$0.90
3/4/2016	Westlaw research	\$9.70
3/8/2016	Westlaw research	\$2.42
3/12/2016	Westlaw research	\$40.01
3/13/2016	Westlaw research	\$18.19
3/14/2016	Westlaw research	\$32.74
3/15/2016	Westlaw research	\$32.74
3/16/2016	Westlaw research	\$37.59
3/17/2016	Westlaw research	\$3.64
3/21/2016	Westlaw research	\$8.49
3/22/2016	Westlaw research	\$8.49
3/23/2016	Westlaw research	\$1.21
3/25/2016	Pacer Service Center, CANDC	\$0.90
3/25/2016	Westlaw research	\$2.42
3/26/2016	Westlaw research	\$20.61
3/27/2016	Westlaw research	\$9.70
3/29/2016	Westlaw research	\$2.42
3/30/2016	Pacer Service Center, CANDC	\$0.90
4/11/2016	Pacer Service Center, CANDC	\$0.90
4/29/2016	Pacer Service Center, CANDC	\$1.00
5/2/2016	Pacer Service Center, CANDC	\$1.00
5/11/2016	Pacer Service Center, CANDC	\$1.10

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DISBURSEMENTS

Date	Description of Disbursements	Amount
6/29/2016	FedEx- Fedex: Judge Nathanael, 06/29/16	\$12.76
6/30/2016	Westlaw research	\$227.40
8/29/2016	In-house Copying and Printing	\$219.20
9/6/2016	Katherine Powell Sullivan- Miscellaneous- Transcript Order - Case No. 14-cv-04086 NC	\$124.10
	Total Disbursements	\$1,184.35

Total Professional Services	\$437,010.00
<i>Less Courtesy Discount</i>	<u>(\$50,038.50)</u>
Total Professional Services Due	\$386,971.50
Total Disbursements Due	\$1,184.35
Total Current Charges	\$388,155.85
AMOUNT DUE	\$388,155.85

Due Upon Receipt. Please include the invoice number on all remittance. Thank you.

EXHIBIT C



Ernest Galvan

50 Fremont Street, 19th Floor
San Francisco, California 94105-2235

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F: (415) 433-7104
E: egalvan@rbgg.com

Ernest Galvan is an AV-rated attorney who represents clients in all phases of complex litigation. His cases have focused on federal-state relationships and complex constitutional law issues.

REPRESENTATIVE CASES

Armstrong v. Brown, 732 F.3d 955 (9th Cir. 2013), cert denied, 134 S. Ct. 2725 (2014)

Armstrong v. Brown, 857 F. Supp. 2d 919 (N.D. Cal. 2012)

Armstrong v. Brown, 805 F. Supp. 2d 918 (N.D. Cal. 2011)

Sterling Park, L.P v. City of Palo Alto, 57 Cal. 4th 1193 (2013)

Retired Employees Association of Orange County v. Orange County, 52 Cal.4th 1171 (2011) (holding for the first time that California government employers are bound by implied contractual terms regarding vested retirement health benefits).

Brown v. Plata, 131 S.Ct. 1910 (2011) (upholding first disputed prison population cap order under the Prison Litigation Reform Act of 1996).

Coleman v. Brown, 938 F. Supp. 2d 955 (E.D. Cal. 2013)

Coleman v. Brown, 428 Fed. Appx. 743 (9th Cir. 2011) (upholding district court order against state prison system to ensure access to inpatient psychiatric hospital beds).

Valdivia v. Schwarzenegger, 599 F.3d 984 (9th Cir. 2010), *rehearing en banc denied*, 623 F.3d 849, *cert. denied*, *Brown v. Valdivia*, 131 S.Ct. 1626 (2011) (addressing interaction between federal due process rights and state administrative procedures).

Prison Legal News v. Schwarzenegger, 608 F.3d 446 (9th Cir. 2010) (addressing limits of continued federal court jurisdiction over state agency's implementation of settlement agreement regarding publisher's First Amendment rights).

In re E.J., 47 Cal.4th 1258 (2010) (concerning conflicts between state constitutional rights and successful ballot initiative).

Coleman v. Schwarzenegger, 922 F. Supp. 2d 882 (E.D. Cal. and N.D. Cal. 2009) (first successful contested trial under 1996 statute limiting federal court issuance of prison overcrowding relief).

Valdivia v. Schwarzenegger, 548 F. Supp. 2d 852 (E.D. Cal. 2008), *affirmed* 599 F.3d 984 (9th Cir. 2010), *rehearing en banc denied*, 623 F.3d 849, *cert. denied*, *Brown v. Valdivia*, 131 S.Ct.



1626 (2011) (affirming magistrate’s order regarding interaction between federal due process guarantees and state administrative procedures, obtained relief for class clients).

Gober v. Ralphs Grocery Co., 137 Cal.App.4th 204 (2006) (concerning constitutional limits on punitive damages awards, defended clients’ entitlement to substantial award for workplace harassment).

EDUCATION

Yale Law School

J.D., June 1997

University of California at Berkeley

**B.A., History, December 1988
with highest distinction**

Phi Beta Kappa, Regents Scholar, Alumni Scholar

PUBLICATIONS AND PRESENTATIONS

“Cal Supreme Court Clarifies BMR Law,” The Registry, November 12, 2013

“New Group Faces Disenfranchisement: California Secretary of State Puts Criminal Justice Reform and Voting Rights on a Collision Course,” The Recorder, Vol. 136, No. 11, March 2012

American Constitution Society for Law and Policy, UCLA, “The Constitution Behind Bars, The Case of California’s Overcrowded Prisons,” March 11, 2009

California State Assembly, Budget Subcommittee, February 24, 2009

George Washington University Law School, Prison Litigation Workshop, March 2008

“Paralegals Revisited,” San Francisco Daily Journal, Aug. 29, 2007.

University of California at Berkeley, Boalt Hall, Prisoner Reentry Seminar, 2007

University of California at Berkeley, Boalt Hall, Seminar on Civil Rights Actions, 2007

Author and Presenter: California Police Misconduct and Institutional Reform Litigation, Systemic Equitable Relief, Lorman Continuing Legal Education Program, 2005

AWARDS AND HONORS

California Lawyer of the Year, 2012, California Lawyer Magazine

Top Verdicts of 2011, San Francisco and Los Angeles Daily Journal

Northern California Super Lawyers, 2010-2016

Best Lawyers of America, 2013-2016, for Appellate Practice and Civil Rights

BAR ADMISSIONS

State Bar of California, 1998, No. 196065

Supreme Court of the United States

U.S. Court of Appeals for the Ninth Circuit



United States District Court for the Northern District of California
United States District Court for the Eastern District of California

EXPERIENCE

Rosen Bien & Galvan, LLP; San Francisco, California

Partner

January 2006 – Present

Associate Attorney

December 1998 – December 2005

Complex civil litigation at the trial court and appellate levels with focus on briefing and presenting complex motions and appeals.

United States District Court

for the Central District of California, Los Angeles, California

Law Clerk to the Honorable Dean D. Pregerson

August 1997 – September 1998

Prepared bench memoranda for law and motion matters. Drafted orders and opinions. Analyzed pre-trial motions and jury instructions. Prepared bench memoranda for Ninth Circuit panel on which Judge Pregerson sat by designation.

Jerome N. Frank Legal Services Organization, New Haven Connecticut

Director, Advocacy for People with Disabilities

September 1996–June 1997

Legal Intern, Advocacy for People with Disabilities

January 1996 – June 1996

Legal Intern, Advocacy for Parents and Children

January 1995 – January 1996

Represented clients in administrative proceedings regarding disability benefits and special education programs. Represented parents and children in abuse, neglect and delinquency proceedings.

Altshuler, Berzon, Nussbaum, Berzon & Rubin, San Francisco, California

Law Clerk

June 1996 – August 1996

Legal research and writing for law firm representing labor unions and public interest organizations.

Yale Law School, New Haven, Connecticut

Research Assistant to Professor Jean Koh Peters

September 1995 – June 1997

Researched legal and ethical issues for the treatise REPRESENTING CHILDREN IN CHILD PROTECTIVE PROCEEDINGS: ETHICAL & PRACTICAL DIMENSIONS (Michie Publishing 1997).

California Appellate Project, San Francisco, California

Legal Intern

June 1995 – August 1995

Researched legal issues, conducted factual investigations and drafted pleadings to support habeas corpus petitions for clients on California's death row.

Charles Schwab & Co., Inc., San Francisco, California

Employee Communications Editor

March 1992 – July 1994

Coordinated communications strategy for senior management of nationwide brokerage firm. Managed the writing, editing and production of internal publications. Designed and implemented an on-line newsletter.



**WBFO FM Public Radio, Buffalo, New York
News Director and Reporter**

February 1990 – March 1992

Produced and hosted panel discussions on local and national issues for National Public Radio (NPR) affiliate station. Reported stories for local newscasts and national programs such as All Things Considered and Morning Edition.

EXHIBIT D



Michael S. Nunez

50 Fremont Street, 19th Floor
San Francisco, California 94105-2235

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F: (415) 433-7104
E: mnunez@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **April 2015 - Present**
Associate Attorney

Represent clients at hearings in federal court. Draft litigation-related documents, including dispositive motions and supporting briefs, mediation briefs, and prelitigation demand letters. Conduct legal research and prepare research memoranda on a wide variety of issues including disability law, employment law, federal criminal law, and procedural issues. Prepare cases through fact investigation.

Disability Rights Advocates, Berkeley, California **September 2013 – April 2015**
Staff Attorney
Wolinsky Fellowship Attorney **September 2011 – September 2013**

Drafted litigation documents, including complaints, briefs, settlement agreements, a motion for preliminary approval of proposed class settlement and supporting papers, fee motions and supporting papers, and written discovery requests. Developed cases through fact investigation, conducting focus groups, and other community outreach. Drafted press releases and media talking points, and participate in case-related interviews with print and broadcast news outlets. Communicated with opposing counsel and clients regarding all aspects of litigation.

Electronic Frontier Foundation, San Francisco, California **March 2011 – June 2011**
Extern

Drafted research memoranda on issues including copyright, social media policies, and state public records statutes.

Winston & Strawn LLP, San Francisco, California **June 2010 – August 2010**
Summer Associate

Drafted research memoranda analyzing issues in several areas of law including employment, intellectual property, and claims under 42 U.S.C. § 1983. Received offer of permanent employment.

U.S. Department of Justice, Washington, D.C. **June 2009 - August 2009**
Summer Law Clerk, Office of Legal Policy

Prepared briefing materials for office management on pending cases of interest. Examined public records, and drafted background memoranda on Federal judicial candidates.



**Lawyers' Committee for Civil Rights Under Law
Washington, D.C.**

July 2007 – July 2008

**Project Associate, Fair Housing, Environmental Justice, and Community Development
Projects**

Authored resource guides for Gulf Coast communities, congressional testimony, and a manual for internal use. Conducted factual research and cite checked briefs for a team of multi-disciplinary attorneys.

**U.S. Federal Trade Commission, Washington, D.C.
Honors Paralegal, Bureau of Competition**

July 2006 – July 2007

Researched market issues for staff attorneys; cite-checked official Commission reports. Conducted investigational interviews; summarized deposition transcripts; reviewed document submissions.

EDUCATION

Stanford Law School, Stanford, California

J.D., 2011

Activities: Environmental Law Clinic: Participant (fall, 2009); Stanford Law and Policy Review (2009 – 2011); Stanford Law and Technology Association: Vice President of Operations (2010-2011); National Association of Law Students with Disabilities: CFO (2009-2010); Conference Director (2009).

Stanford University, Stanford, California

B.A., Economics, 2006

**Impact Fund Class Action Training Institute
San Francisco, California**

September 2013

Completed three-day class action litigation training program.

BAR ADMISSIONS

State Bar of California No. 280535 (2011)

PUBLISHED CASES

National Federation of the Blind of California v. Uber Technologies, Inc., 103 F. Supp. 3d 1073 (N.D. Cal. 2015)

Greater Los Angeles Agency on Deafness v. Cable News Network, Inc., 742 F.3d 414 (9th Cir. 2014)

California Council of the Blind v. County of Alameda, 985 F. Supp. 2d 1229 (N.D. Cal. 2013)

PUBLICATIONS/PRESENTATIONS

Disability Rights Laws and the Sharing Economy, American Bar Association (Jul. 14, 2016)



The Latest on Class Actions and the “Sharing Economy,” Impact Fund Class Action Conference (Feb. 19, 2016)

NFB Litigation Helping to Transform Our Dreams Into Reality (Jul. 2, 2016)

PROFESSIONAL AFFILIATIONS AND ACTIVITIES

Member, National Association of Blind Lawyers

Member, Disability Rights Bar Association

Member of Board of Directors, Lighthouse for the Blind and Visually Impaired

Member, Bay Area Lawyers for Individual Freedom

EXHIBIT E



Karen E. Stilber

50 Fremont Street, 19th Floor
San Francisco, California 94105-2235

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F: (415) 433-7104
E: kstilber@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **2009 - Present**
Senior Litigation Paralegal

General and complex civil litigation, with an emphasis on civil rights, employment, business, and attorneys' fees cases, at the trial court and appellate levels.

The Sturdevant Law Firm, San Francisco, California **2006 – 2008**
Litigation Paralegal

Senior paralegal in nationally-recognized plaintiff's firm specializing in class actions. Primary paralegal on several class action matters involving issues relating to consumer protection, unlawful and unfair business practices, predatory lending, false and misleading advertising and federal and state disability nondiscrimination laws.

Responsibilities included: *Discovery* – managed, reviewed, analyzed and coded large volumes of documents, reviewed and analyzed written discovery and deposition transcripts, assisted with deposition preparation. *Motions and other filings in state and federal courts* – drafted basic pleadings, fact and cite checked, edited and proofread briefs, prepared supporting documents for various types of motions, including motions to compel, summary judgment, class certification and preliminary approval motions, supervised finalization of all papers. Ensured compliance with court rules and assisted with filings, including ECF filing. *Appellate work* – edited and cite checked briefs filed in appellate courts, including the Ninth Circuit and California Supreme Court, prepared appellate appendices, ensured compliance with all rules and procedures, assisted attorneys with oral argument preparation. *Research* – conducted legal research using Westlaw and Lexis and factual research relating to case development. *Calendaring* – had responsibility for calendaring all case deadlines pursuant to federal, state and local rules.

Preston Gates Ellis, LLP, San Francisco, California
Litigation Paralegal **1999- 2006**
Litigation Secretary **1998- 1999**

Worked on wide variety of general civil commercial and employment litigation matters in San Francisco branch of large Seattle-based law firm. Trial and arbitration experience included witness and exhibit preparation, preparation of jury instructions and trial binders. Assisted attorneys at trial.



Bradley, Curley & Asiano, Larkspur, California **1995 – 1998**
Litigation Secretary

Secretary to construction defect litigation attorneys in insurance defense firm.

Barry & Tong, San Francisco, California **1990 – 1995**
Litigation Secretary

Secretary to attorneys in general litigation firm.

EDUCATION

University of North Carolina, Chapel Hill **B.A., International Studies, 1989**
Year Abroad Program, Seville, Spain, 1987-1988



Gregorio Z. Gonzalez

50 Fremont Street, 19th Floor
San Francisco, California 94105-2235

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F: (415) 433-7104
E: ggonzalez@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California

Paralegal **2014 – Present**

Assist attorneys draft correspondence, maintain large databases, communicate with clients and contractors, research, interview class members in person, train new employees on processes and databases, coordinate attorneys and other paralegals for tasks and meetings, compose memoranda regarding reports and experiences, review records and summarize records, prepare pleadings for filing, and any other tasks requested.

Administrative Assistant **2012 – 2014**

Performed daily administrative functions of the law firm including mail processing, database updates, & assisting with legal correspondence. Assisted attorneys with any help required such as basic research and administrative duties. Worked as interpreter for any Spanish-speaking clients; including conversational interpretation and correspondence interpretation.

Social Security Administration, San Francisco, California **February – August 2012**

Paralegal Intern, Office of General Counsel

Helped compose sections of select motions and pleadings. Helped archive office records. Assisted attorneys with any help they needed. Numerous administrative tasks as requested.

Kaiser Permanente, South San Francisco, California **August 2009 – July 2014**

Communications Operator

Provided telecommunication customer service to internal and external clients. Performed various administrative tasks as assigned by my manager. Served as the Service Employees International Union-United Healthcare Workers West Union Shop Steward for my department in which I met with different managers and administrative personnel to discuss workplace problems and situations with regards to our collective bargaining contract.



EDUCATION

San Francisco State University
College of Extended Learning

Paralegal Certificate, 2012

3.81 GPA in ABA Approved Paralegal Studies Program

Coursework: Introduction to Civil Procedure, Legal Research & Writing, Pleadings & Motions, Computer Applications in Law, Discovery & Trial Preparation, Constitutional Law, Criminal Law, Ethics, Computer Applications in Law II, Torts

San Francisco State University

B.A., History, 2010

Honors: Dean's List (3 semesters – 3.44 GPA)

LANGUAGES

Spanish

EXHIBIT F

NFB v. UBER TECHNOLOGIES, INC., No. 3:14-cv-04085-NC (N.D. Cal.)
RBGG FEES TIME --FIRM SUMMARY -- AS OF SEPT. 9, 2016

FIRM/TIMEKEEPER	RATE	HOURS	ACTUAL AMOUNT	BILLING JMT HOURS	AMOUNT OF BILLING JMT DEDUCTIONS	CLAIMED HOURS	CLAIMED AMOUNT	PERCENTAGE OF HOURS DEDUCTED
RBGG								
PARTNER								
Bien, Michael	\$900	5.8	\$5,220	5.8	\$5,220	0.0	\$0	100.0%
Galvan, Ernest	\$740	18.0	\$13,320	0.4	\$296	17.6	\$13,024	2.2%
ATTORNEY								
Nunez, Michael (RBGG)	\$460	34.3	\$15,778	5.2	\$2,392	29.1	\$13,386	15.2%
PARALEGAL								
LaPurja, Gail	\$275	0.2	\$55	0.2	\$55	0.0	\$0	100.0%
TOTAL		58.3	\$34,373	11.6	\$7,963	46.7	\$26,410	19.9%



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National Federation of the Blind

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RE: Fees work

For Professional Services Rendered Through September 09, 2016

ACCOUNT SUMMARY

Matter	Description	Fees	Expenses	Discount	Total Due
000002	Fees work	\$36,557.50	\$0.00	(\$10,147.50)	\$26,410.00
AMOUNT DUE					\$26,410.00

Courtesy Discount is 27.76 %
of "gross" hours worked

Previous retainer account balance \$0.00
Net change to retainer account (\$0.00)
Retainer account balance \$0.00



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RE: Fees work

For Professional Services Rendered Through September 09, 2016

SERVICES

Date	Person	Description of Services	Hours	Discount
3/24/2016	MSN	(No Charge) Emails to account re total fees and costs.	0.0	0.1
6/2/2016	MSN	Review and respond to emails from legal team re Lodestar and preliminary approval hearing.	0.2	
6/2/2016	MSN	(No Charge) Confer with accountant re fees for case.	0.0	0.1
6/2/2016	MSN	(No Charge) Draft emails to co-counsel re prep of estimate of attorneys fees.	0.0	0.1
6/8/2016	MSN	(No Charge) Draft email to co-counsel re summary of RBGG Lodestar.	0.0	0.1
6/9/2016	MSN	(No Charge) Prepare Lodestar summary chart for co-counsel.	0.0	0.2
6/15/2016	MSN	(No Charge) Draft emails to legal team re attorneys fees and costs and re Braille copies of settlement and notice.	0.0	0.5
7/27/2016	MWB	(No Charge) Conference with MN re fees petition preparation and strategy.	0.0	0.3
7/27/2016	MSN	(No Charge) Confer with MWB re schedule and strategy for fee motion.	0.0	0.3
7/27/2016	MSN	(No Charge) Call with co-counsel re strategy and timeline for fee mtn.	0.0	0.3
7/27/2016	MSN	(No Charge) Draft email to TRE re strategy for fee motion.	0.0	0.2
7/28/2016	EG	(No Charge) emails to MN re fees application.	0.0	0.2

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SERVICES

Date	Person	Description of Services	Hours	Discount
7/28/2016	MWB	(No Charge) Emails with MN-EG re preparation of Brief and Declarations.	0.0	0.3
7/28/2016	MSN	(No Charge) Draft several emails to T. Elder, RBGG partners,a and RBGG associates re prep and strategy for fee motion.	0.0	0.3
7/28/2016	MSN	(No Charge) Send instructions to staff re work on fee motion.	0.0	0.2
7/28/2016	MSN	(No Charge) Confer with VS re RBGG process for reviewing time records re fee motion.	0.0	0.5
7/28/2016	MSN	Review and respond to email from E. Galvan re fee petitions and supporting papers.	0.1	
7/28/2016	MSN	Begin to prepare fee motion checklist, and draft email to co-counsel re same.	0.3	
7/28/2016	MSN	(No Charge) Begin to review prior RBGG fee motions re development of strategy for fee motion.	0.0	0.4
7/28/2016	MSN	(No Charge) Continue to review prior RBGG fee motions re development of strategy for fee motion.	0.0	0.3
7/28/2016	MSN	(No Charge) Continue to review prior RBGG fee motions re development of strategy for fee motion, and draft email to co-counsel re same.	0.0	0.3
7/28/2016	MSN	(No Charge) Begin research re Lodestar multipliers.	0.0	0.1
7/29/2016	MWB	(No Charge) Draft email to HT re fees petition.	0.0	0.2
7/29/2016	MSN	Prepare brief memo re case law re Lodestar mutlipliers and fees on fees, and email to co-counsel re same.	0.9	
7/29/2016	MSN	(No Charge) Continue to review RBGG fee petitions and prepare strategy/schedule for fee motion.	0.0	0.5
7/29/2016	MSN	Draft email to T. Elder re MPA ISO fee motion.	0.1	
7/29/2016	MSN	Review RBGG MPA ISO fee motion in other ADA case, and draft email to T. Elder re relevant case law from same.	0.6	
7/29/2016	MSN	Draft email to T. Elder re supporting papers for fee motion, and schedule re drafting same.	0.3	
7/31/2016	MWB	(No Charge) Email with TE-MN re fees motion and strategy.	0.0	0.2
7/31/2016	MSN	Review and respond to emails from legal team re fee motion and possible fee negotiations.	0.1	
8/1/2016	MWB	(No Charge) Telephone conference with MN-TE re fees motion and declarations.	0.0	0.3
8/1/2016	MSN	Call with MWB and T. Elder re strategy for fee motion.	0.3	

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Date	Person	Description of Services	Hours	Discount
8/3/2016	MWB	(No Charge) Emails re RBGG fees review.	0.0	0.2
8/3/2016	MSN	(No Charge) Review and respond to emails from MWB and staff re reviewing RBGG time for discretionary cuts for fee motion.	0.0	0.1
8/5/2016	MWB	(No Charge) Telephone conference with MLKs re DRA fees and motion.	0.0	0.3
8/5/2016	MWB	(No Charge) Conference with MN re projects.	0.0	0.1
8/5/2016	MWB	(No Charge) Telephone conference with TE re fees motion strategy.	0.0	0.3
8/5/2016	MSN	Confer with MWB re fee motion schedule, and draft email to T. Elder re same.	0.2	
8/6/2016	MWB	(No Charge) Draft email to Team re fee petition.	0.0	0.2
8/8/2016	MWB	(No Charge) Emails TE-MN re fee petition.	0.0	0.1
8/8/2016	MWB	(No Charge) Conference with SW re DRA fees.	0.0	0.2
8/8/2016	MSN	Draft emails to legal team re planning for fee motion.	0.2	
8/9/2016	LAE	(No Charge) conf with MN and MWB re strategy and timing for fee petition.	0.0	0.3
8/9/2016	MWB	(No Charge) Conference with LE and MN re fee petition timeline and drafting.	0.0	0.3
8/9/2016	MSN	Strategy meeting with LMWB re schedule for drafting fee petition.	0.3	
8/11/2016	MWB	(No Charge) Email SW re fee petition.	0.0	0.1
8/11/2016	MSN	Call with T. Elder re fee motion schedule.	0.2	
8/11/2016	MSN	Call with MWB re fee motion schedule and strategy.	0.1	
8/12/2016	MWB	(No Charge) Emails MN-Team re assignments for motion and strategy.	0.0	0.3
8/12/2016	MWB	(No Charge) Emails re assignments.	0.0	0.2
8/12/2016	SJR	(No Charge) Emails with MWB re fee application.	0.0	0.3
8/12/2016	MSN	Review declarations re prep for fee motion drafting strategy call.	0.6	
8/12/2016	MSN	Fee motion drafting strategy call with T. Elder and J. Marks.	0.9	
8/12/2016	MSN	(No Charge) Draft email with fee motion drafting plan to MWB with questions re same.	0.0	0.4
8/15/2016	EG	Reviewing file re Uber fees application and emails to team re next steps.	0.7	

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SERVICES

Date	Person	Description of Services	Hours	Discount
8/15/2016	GCG	(No Charge) Emails to SJR and EG re fee application.	0.0	0.2
8/15/2016	GCG	(No Charge) Conf w/ MWB re same.	0.0	0.2
8/15/2016	MWB	(No Charge) Conference with EG and emails re fees motion.	0.0	0.3
8/15/2016	SJR	(No Charge) Emails re staffing for application.	0.0	0.5
8/16/2016	GCG	(No Charge) Confs w/ SJR and EG re fee application.	0.0	0.2
8/16/2016	GCG	(No Charge) Review TE email re declaration.	0.0	0.2
8/16/2016	SJR	(No Charge) Emails re coverage and conference with GG re same.	0.0	0.5
8/16/2016	MSN	Review and respond to email from E. Galvan re declarations for fee motion.	0.2	
8/17/2016	MSN	(No Charge) Review and respond to email from JZM re questions re DRA billable time.	0.0	0.1
8/18/2016	EG	(No Charge) emails re declarations needed for the fees application.	0.0	0.2
8/18/2016	MSN	Call with R. Pearl re rates declaration ISO fee motion, draft email to legal team re same, and draft lengthy email with info requested by R. Pearl re same.	1.5	
8/18/2016	FGL	(No Charge) Email from/to MSN re fee motion declarations and create shells re same.	0.0	0.2
8/23/2016	EG	Working on the fees presentation for the Uber settlement.	2.5	
8/24/2016	EG	Reviewing RBGG and DRA time for the Uber fees claim.	0.8	
8/24/2016	EG	Revising summaries and presentation of RBGG time for Uber fees claim.	1.2	
8/24/2016	MWB	(No Charge) Review emails re time records and fee petition strategy.	0.0	0.2
8/24/2016	MSN	Confer with EG re declarations ISO motion for fees and costs, review info from EG re breakdown of fees and costs.	0.2	
8/24/2016	MSN	Review and respond to question from EG re activities of consultant.	0.1	
8/24/2016	MSN	(No Charge) Review email from K. Shiotani re Decker Declaration and draft instructions to word processor re same.	0.0	0.1
8/25/2016	EG	Additional analysis of fact showing for uber fee app.	1.0	
8/25/2016	EG	Preparing phase of case summaries for the Uber fee petition.	0.8	
8/25/2016	MSN	Review case records and prepare time period phases for case.	1.1	

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Date	Person	Description of Services	Hours	Discount
8/27/2016	EG	Reviewing materials for the Uber fee application and preparing declaration support and summaries re same.	6.5	
8/27/2016	MWB	(No Charge) Emails EG-Team re strategy and time records.	0.0	0.3
8/27/2016	MSN	Finish drafting Goldstein Decl. ISO fee petition.	2.0	
8/27/2016	MSN	Finish drafting Goldstein Decl. ISO fee petition.	2.1	
8/28/2016	MWB	(No Charge) Emails re time records.	0.0	0.2
8/28/2016	MSN	Continue to draft Bien decl. ISO Mtn. for fees and costs.	2.4	
8/30/2016	EG	Revising parts of the Uber fee application, and email to team re same.	0.8	
8/30/2016	EG	Review and revise draft dec re fees app.	0.5	
8/30/2016	EG	Responding the questions re the Uber fee petition.	0.2	
8/30/2016	MWB	(No Charge) Emails re fees strategy.	0.0	0.3
8/30/2016	MWB	(No Charge) Review and revise D. Goldstein declaration and emails MN-EG re same.	0.0	0.5
8/30/2016	MSN	Review Dan Goldstein's recent accomplishments re disability litigation/awards, and revise draft declaration re same.	1.1	
8/30/2016	MSN	Call with MWB re status of fee motion.	0.1	
8/30/2016	MSN	Finish revising draft Goldstein Decl. ISO fee motion, and draft email to legal team re same.	0.7	
8/30/2016	MSN	Draft additional content for Goldstein declaration ISO fee motion.	0.4	
8/30/2016	MSN	Continue to draft additional content for Goldstein decl. ISO fee motion based on MWB feedback.	0.4	
8/30/2016	MSN	Continue to draf additional content for MWB decl. ISO fee motion.	0.4	
8/31/2016	EG	Review and comment on the draft settlement letter to Uber re the fees and costs.	0.2	
8/31/2016	MSN	Begin to draft Kirk adams Decl. ISO fee motion, and prep for cal with M. Richert re same.	1.0	
8/31/2016	MSN	Call with M. Richert re Kirk Adams decl. ISO fee mtn, and draft followup email to Richert re same.	0.4	
8/31/2016	MSN	Continue to draft Adams decl. ISO fee motion.	0.8	
8/31/2016	MSN	Review and respond to draft email to Andrew re negotiating fees and costs.	0.1	

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SERVICES

Date	Person	Description of Services	Hours	Discount
9/1/2016	GCG	(No Charge) Conf w/ EG re fees app, call w/ opposing counsel.	0.0	0.1
9/1/2016	MWB	(No Charge) Emails team re fees negotiation.	0.0	0.1
9/1/2016	MSN	Review emails from Uber counsel and TRE re call to negotiate fees.	0.1	
9/2/2016	EG	Conf with TE re the fees app.	0.1	
9/2/2016	EG	Various re preparing the fees application for Uber.	0.4	
9/2/2016	MSN	Strategy meeting with T. Elder and J. Marks re fee motion and supporting declarations.	0.2	
9/2/2016	MSN	Meet with MWB and T. Elder Re fee motion strategy.	0.4	
9/2/2016	MSN	Draft email with fact research instructions to KS re number of service animal users and guide dog users in U.S.	0.1	
9/3/2016	EG	Emails re fees dec for Uber.	0.1	
9/3/2016	MWB	(No Charge) Emails TE re fees declarations.	0.0	0.1
9/5/2016	EG	Emails with TRE re fees application.	0.2	
9/6/2016	EG	Review and revise the Uber fees app declarations.	0.8	
9/6/2016	MWB	(No Charge) Emails re fees declarations.	0.0	0.2
9/7/2016	MSN	Review Elder, Mason, and Pearl declarations ISO fee motion.	1.2	
9/8/2016	MSN	Continue to review draft Elder declaration.	0.4	
9/8/2016	MSN	Finish reviewing draft elder declaration, and send email to T. Elder with redlines and comments.	0.7	
9/8/2016	MSN	Continue to revise draft Goldstein declration ISO fees and costs.	0.4	
9/8/2016	MSN	Draft emails to legal team re reviewing additional time records for fee motion.	0.2	
9/9/2016	EG	Reviewing and revising new outside declaration, and emails re expert costs.	0.8	
9/9/2016	MSN	Continue to draft additional content for Goldstein Decl. ISO fee motion.	1.0	
9/9/2016	MSN	Review order denying Uber's MTD, and further revise Goldstein declaration ISO fee motion.	1.2	
9/9/2016	MSN	Review and respond to inquiry from co-counsel re consultant Richard martell's services.	0.3	

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Date	Person	Description of Services	Hours	Discount
9/9/2016	MSN	Finish drafting and revising Goldstein declaration, and circulate to legal team, and emails with team re same, and review revisions from legal team to same.	0.8	
9/9/2016	MSN	Draft email to D. Goldstein re declaration ISO fee mtn.	0.4	
9/9/2016	MSN	Continue to draft Adams decl. ISO fee mtn.	1.2	
9/9/2016	MSN	Email to T. Elder re current draft of Elder Decl. ISO fee mtn.	0.1	
Total Professional Services			46.7	14.1
Total Professional Services Due				\$26,410.00

PERSON RECAP

Person	Actual Hours Billed	Hours Claimed	Rate	Total Amount
MWB Michael W. Bien	5.8	0	\$900.00	\$0.00
LAE Lisa A. Ells	0.3	0	\$600.00	\$0.00
EG Ernest Galvan	18.0	17.6	\$740.00	\$13,024.00
GCG Gay C. Grunfeld	0.9	0	\$790.00	\$0.00
SJR Sanford Jay Rosen	1.3	0	\$995.00	\$0.00
MSN Michael S. Nunez	34.3	29.1	\$460.00	\$13,386.00
FGL F. Gail LaPurja	0.2	0	\$275.00	\$0.00

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Total Professional Services	\$36,557.50	
<i>Less Courtesy Discount</i>	<u>(\$10,147.50)</u>	
Total Professional Services Due	\$26,410.00	
Total Disbursements Due	\$0.00	
Total Current Charges		\$26,410.00
AMOUNT DUE		\$26,410.00

Due Upon Receipt. Please include the invoice number on all remittance. Thank you.
