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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,

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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

1 discussed with Mr. Galvan the billing judgment reductions he made to the time entries in
2 this case, and agree with his methodology and judgments. In calculating the lodestar
3 described below for RBGG timekeepers, Mr. Galvan has made appropriate billing
4 judgment reductions.

5 20. RBGG expended 872.3 hours on the merits (apart from fees work) case from
6 April 20, 2015 until September 9, 2016. RBGG has written off a total of 130.4 hours, or
7 approximately 14.9% of the billable hours. This amounts to \$49,766 in billing judgment
8 reductions to ensure that we have accounted for any undue duplication of effort or
9 inefficiency. After these billing judgment reductions, RBGG claims a total of 741.9 hours
10 of compensable time for a total claimed lodestar of \$386,972 for all merits work invested
11 in this case since April 2015. True and correct copies of RBGG's billing entries indicating
12 the hours worked and the tasks completed by RBGG staff, as well as a summary table of
13 the entries are attached hereto as **Exhibit B**. Time entries have been redacted where
14 necessary to protect the privacy of individuals who consulted with our firm but did not
15 become named plaintiffs in this action.

16 21. Mr. Galvan has also reviewed DRA and TRE Legal Practice's time entries.
17 Mr. Galvan worked closely with these co-counsel in making appropriate billing judgment
18 reductions to their time entries in addition to the billing judgment reductions that co-
19 counsel made internally. I have discussed with Mr. Galvan the billing judgment reductions
20 that he made to DRA and TRE Legal Practice's time entries in this case and agree with his
21 methodology and judgments. In calculating the lodestar described below for all Plaintiffs'
22 Counsel's timekeepers, Mr. Galvan has made appropriate billing judgment reductions.

RBGG's Reasonable Hourly Rates

23
24 22. The following table shows RBGG's requested 2016 hourly rates for the
25 attorneys and other staff who worked on this action and for whom compensation is sought.

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| 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 |

15
 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

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F: (415) 433-7104
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 | Real Property Litigation |
| Trade Practices | Complex Litigation |
| Trade Secrets | Commercial Litigation |
| Intellectual Property | Disabilities Law |
| Class Actions | Mental Health Law |
| Attorneys' Fees | Civil Rights |
| Securities Litigation | Prisoner Rights |
| Internet Law | |

REPRESENTATIVE CLIENTS

| | |
|-----------------------------------|------------------|
| Aerosafe, Inc. | Primark Benefits |
| Computer Education Managers Assn. | Pfizer Inc. |
| Estee Lauder, Inc. | Trans Union |
| Nextcard, Inc. | |

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
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

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 |

September 19, 2016
 Client: 001318
 Matter: 000001
 Invoice #: 15392
 Resp. Atty: MWB
 Page: 2

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
 Matter: 000001
 Invoice #: 15392
 Resp. Atty: MWB
 Page: 3

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
 Matter: 000001
 Invoice #: 15392
 Resp. Atty: MWB
 Page: 4

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 | |

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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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 depos, 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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| 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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| 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. Spurchase 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| 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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| Date | Person | Description of Services | Hours | Discount |
|-------------|---------------|---|--------------|-----------------|
| 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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|-------------|---------------|---|--------------|-----------------|
| 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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|-------------|---------------|--|--------------|-----------------|
| 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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|-------------|---------------|---|--------------|-----------------|
| 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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|-------------|---------------|--|--------------|-----------------|
| 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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| 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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|-------------|--|---------------|
| 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

T: (415) 433-6830
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

T: (415) 433-6830
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

T: (415) 433-6830
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

T: (415) 433-6830
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% |



ROSEN BIEN
GALVAN & GRUNFELD LLP

50 Fremont Street, 19th Floor
San Francisco, California 94105-2235
Telephone: (415) 433-6830 Fax: (415) 433-7104
www.rbgg.com
Michael W. Bien
Email: mbien@rbgg.com

National Federation of the Blind

September 19, 2016
Client: 001318
Matter: 000002
Invoice #: 15393
Resp. Atty: MWB
Page: 1

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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National Federation of the Blind

September 19, 2016

Client: 001318

Matter: 000002

Invoice #: 15393

Resp. Atty: MWB

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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 |

September 19, 2016
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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 | |

September 19, 2016
 Client: 001318
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SERVICES

| 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 | |

September 19, 2016
 Client: 001318
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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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SERVICES

| 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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SERVICES

| 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.
