

**ELDER
DECLARATION
EXHIBIT H**

NFB v. UBER TECHNOLOGIES, INC., No. 3:14-cv-04085-NC (N.D. Cal.)
 TRE LEGAL PRACTICE
 AS OF SEPT. 9, 2016

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Date	User	Description	Actual	Charge Status	Claim	RATE	Claim Amount	Phase Code
4/1/14	Elder, Timothy	Review Twitter discussions on accessibility of app	0.5		0.5	475	237.5	1
4/3/14	Elder, Timothy	Research remedies under Section 55 of civil code; analyze risk of bilateral attorneys fees	0.8		0.8	475	380	1
4/7/14	Elder, Timothy	Discuss intakes with co-counsel M Nunez	0.6		0.6	475	285	1
4/8/14	Elder, Timothy	Review public Uber docs	0.6		0.6	475	285	1
4/11/14	Elder, Timothy	Discuss next steps and co-counseling agreement with M Nunez	0.2		0.2	475	95	1
4/14/14	Elder, Timothy	Call NFBc President re retainer and disinterested vote; respond to M Nunez re preliminary matters; review arbitration issues	1.7		1.7	475	807.5	1
4/14/14	Elder, Timothy	Analyze enforceability of Uber TOCs	0.3		0.3	475	142.5	1
4/17/14	Elder, Timothy	Review/letter; edit; send note to co-counsel	0.5		0.5	475	237.5	1
4/17/14	Elder, Timothy	Discuss items with M Nunez	0.6		0.6	475	285	1
4/26/14	Elder, Timothy	Discuss representation with NFBc as client; disclose potential conflict	0.6		0.6	475	285	1
4/29/14	Elder, Timothy	Review emails from potential plaintiffs and declarants	0.6		0.6	475	285	1
5/5/14	Elder, Timothy	Discuss strategy and filing steps with M Nunez	0.5		0.5	475	237.5	1
5/5/14	Elder, Timothy	Investigate potential claims; interview potential claimants; review changes to outreach notice; distribute notice to various groups; discuss announcement with key players	2.9		2.9	475	1377.5	1
5/6/14	Elder, Timothy	Review client and co-counsel agreements; sign and return to relevant parties with edits; review facts of client and do background check on individuals	0.9	No Charge	0	475	0	1
5/7/14	Elder, Timothy	Review fact memo prepared by paralegal; review online research re status of Uber and driver terms	0.9		0.9	475	427.5	1
5/7/14	Elder, Timothy	Take emails from potential passenger clients or declarants	0.4		0.4	475	190	1
5/8/14	Elder, Timothy	Attend conference call with DRA M Nunez and paralegal	0.8		0.8	475	380	1
5/8/14	Elder, Timothy	Talk with prospective plaintiff; discuss Uber issue with NFBc chapter at large	0.5		0.5	475	237.5	1
5/8/14	Elder, Timothy	Research litigation history of Uber in Northern district; read judicial decisions re same	1.9		1.9	475	902.5	1
5/9/14	Elder, Timothy	Call M Nunez re REDACTED; email re same	0.4		0.4	475	190	1
5/9/14	Elder, Timothy	Talk with M Hingson re status of suit	0.5		0.5	475	237.5	1
5/13/14	Elder, Timothy	Talk with REDACTED; talk with M Nunez re same	1.5		1.5	475	712.5	1
5/15/14	Elder, Timothy	Call M Nunez re updates and opportunity to meet clients	0.3		0.3	475	142.5	1
5/16/14	Elder, Timothy	Respond to calls and emails re clients talking to press	0.5		0.5	475	237.5	1
5/19/14	Elder, Timothy	Meet with M Nunez re case strategy before and after press interviews	1		1	475	475	1
5/19/14	Elder, Timothy	Respond to emails; call M Hingson re NFBc participation and public comment; call NCB re same on Uber NFB Partnership	0.5		0.5	475	237.5	1
5/19/14	Elder, Timothy	Call NCB re meeting and "partnership" between Uber and NFB national; work on related matters in reviewing materials from filing	3.9		3.9	475	1852.5	1
5/20/14	Elder, Timothy	Call clients; review press stories; respond to emails from co-counsel; review recent case re standing	1.2		1.2	475	570	1
5/21/14	Elder, Timothy	Research ethics of sending investigator	0.6		0.6	475	285	1
5/21/14	Elder, Timothy	Talk with REDACTED re filing; call interested party re correction to filing announcement; talk with M Nunez; take call from M Hingson	1.5		1.5	475	712.5	1
5/22/14	Elder, Timothy	Talk with NFB national re meeting and press; call M Nunez re same	1.5		1.5	475	712.5	1
5/23/14	Elder, Timothy	Edit demand letter; call REDACTED; respond to flurry of emails re filing	2.6		2.6	475	1235	1
5/28/14	Elder, Timothy	Call potential plaintiffs	0.4		0.4	475	190	1
5/29/14	Elder, Timothy	review correspondence from potential declarants and clients; make notes; follow up with calls for clarity	3.4		3.4	475	1615	1
5/30/14	Elder, Timothy	Review summary of REDACTED communications with Uber; discuss status with M Nunez; call REDACTED re same; call M Hingson re retainer	1.3		1.3	475	617.5	1
5/31/14	Elder, Timothy	Talk with REDACTED re Massachusetts group	0.2		0.2	475	95	1
6/2/14	Elder, Timothy	Discuss sending demand letter with M Nunez	0.2		0.2	475	95	2
6/2/14	Elder, Timothy	Talk with REDACTED re retainer	0.3	No Charge	0	475	0	1
6/4/14	Elder, Timothy	Review correspondence from co-counsel and clients	0.3		0.3	475	142.5	1

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Date	User	Description	Actual	Charge Status	Claim	RATE	Claim Amount	Phase Code
6/4/14	Elder, Timothy	Send demand letter to clients and interested parties; review next steps; organize case file	0.5		0.5	475	237.5	1
6/5/14	Elder, Timothy	Review recent disability claims asserted against Uber	0.4		0.4	475	190	1
6/11/14	Elder, Timothy	Review email from intake; call re investigation of driver policies and training	0.5		0.5	475	237.5	1
6/3/14	Elder, Timothy	Deal with potential Uber sponsor at NFB national convention; call REDACTED; review communications from REDACTED; draft letter to REDACTED for Uber	2.1		2.1	475	997.5	1
6/16/14	Elder, Timothy	Discuss Uber communications with NFB	0.5		0.5	475	237.5	1
6/18/14	Elder, Timothy	Update clients on progress of demand	0.2		0.2	475	95	2
6/23/14	Elder, Timothy	Discuss next steps with M Nunez	0.6		0.6	475	285	1
6/24/14	Elder, Timothy	Discuss opportunity to meet at NAAGU meeting in Orlando	0.9	No Charge	0	475	0	1
6/26/14	Elder, Timothy	Talk with M Nunez re experiences with driver and Peggy	0.2		0.2	475	95	1
6/30/14	Elder, Timothy	Talk with former Uber drivers; communicate with other attorneys re similar actions	0.2		0.2	475	95	1
7/3/14	Elder, Timothy	Speak to guide dog users meeting at NFB convention; review demand response letter; discuss with expert individuals	0.7		0.7	475	332.5	1
7/7/14	Elder, Timothy	Respond to Uber letter; discuss with clients; review legal regs; investigate Uber driver control; call REDACTED	2.2		2.2	475	1045	2
7/10/14	Elder, Timothy	Facilitate settlement meeting	0.4		0.4	475	190	2
7/14/14	Elder, Timothy	Prepare to attend Uber mediation; discuss strategy with DRA	2.9		2.9	475	1377.5	2
7/16/14	Elder, Timothy	Attend settlement conference; discuss same with clients and co-counsel	3.5		3.5	475	1662.5	2
7/17/14	Elder, Timothy	Review structured negotiations agreement; propose edits to M Nunez; discuss updates with REDACTED	0.5		0.5	475	237.5	2
7/24/14	Elder, Timothy	Discuss status of negotiations with REDACTED	0.2		0.2	475	95	2
7/29/14	Elder, Timothy	Discuss progress of communications with REDACTED	0.4		0.4	475	190	2
8/6/14	Elder, Timothy	Edit letter from NFB re Uber in Maryland to mention service animals issue; discuss with REDACTED	1.4		1.4	475	665	1
8/8/14	Elder, Timothy	Prepare to file complaint; discuss issues with potential plaintiffs/declarants	1.1		1.1	475	522.5	1
8/14/14	Elder, Timothy	Talk with potential witnesses and clients; call REDACTED back; discuss complaint with M Nunez	1.3		1.3	475	617.5	1
8/22/14	Elder, Timothy	Talk with individuals re experiences; call intakes back; reach out to REDACTED and others	0.4		0.4	475	190	1
8/25/14	Elder, Timothy	Edit complaint; make notes of items to do on supplementing allegations	1.4		1.4	475	665	1
8/26/14	Elder, Timothy	Interview REDACTED; edit factual material of complaint	1.5		1.5	475	712.5	1
8/28/14	Elder, Timothy	Talk with M Nunez re complaint and outreach	0.6		0.6	475	285	1
8/30/14	Elder, Timothy	Review recent CTA9 cases on employee classification as applicable to Uber	0.8		0.8	475	380	1
9/3/14	Elder, Timothy	Edit complaint; interview intakes for complaints and witnesses; call multiple witnesses; incorporate stories into complaint; confirm details with documented proof; edit press release in conjunction with complaint	6.8		6.8	475	3230	1
9/4/14	Elder, Timothy	Edit complaint with further details from denied passengers; call passengers to confirm their information and stories; discuss items with M Hingson	3.6		3.6	475	1710	1
9/4/14	Elder, Timothy	Talk with DRA re status of complaint and date for optinum filing; discuss affect of other actions on our matter	0.4		0.4	475	190	1
9/6/14	Elder, Timothy	Edit complaint; call declarant witnesses; draft factual material; prepare for filing; review changes to press release; provide notice to interested parties	8.1		8.1	475	3847.5	1
9/9/14	Elder, Timothy	Work with M Nunez and support staff to file complaint and prepare administrative files; contact court clerk re attorney admissions; communicate with press; send notice of complaint to interested parties; talk with NFB national re same	5.2		5.2	475	2470	3
9/10/14	Elder, Timothy	Review standing order and filing deadlines; discuss with M Nunez re same; calendar items to do; take calls from intake line re complaint; revise press release per clients instructions	3.3		3.3	475	1567.5	3
9/11/14	Elder, Timothy	Return calls from potential witnesses; review online forums re discussion of service animal discrimination	2.7		2.7	475	1282.5	3

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9/12/14	Elder, Timothy	Correspond with other interested parties re filing of case; discuss administrative issues with M Nunez; return calls from potential witnesses	1.2		1.2	475	570	3
9/13/14	Elder, Timothy	Interview additional intakes for inclusion in amended complaint; send notes to legal team; discuss next steps via PUC with client and effect of lawsuit on comments	2.1		2.1	475	997.5	3
9/15/14	Elder, Timothy	Talk with M Nunez re various matters including additional witnesses, REDACTED of Mass and political actions by NFBIC at PUC as applicable to litigation	0.3		0.3	475	142.5	3
9/16/14	Elder, Timothy	Return calls from interested parties and declarants re status of filing	1.2		1.2	475	570	3
9/16/14	Elder, Timothy	Attend conference call with M Nunez and REDACTED; attend follow up call with M Nunez to debrief	0.6		0.6	475	285	3
9/18/14	Elder, Timothy	Respond to interested parties re filing; review press broadcast	0.6		0.6	475	285	3
9/21/14	Elder, Timothy	Review TPA petition to California Supreme Court re PUC ruling	0.5		0.5	475	237.5	3
9/25/14	Elder, Timothy	Interview potential witness for inclusion in amended complaint; draft notes of her experience; review documents of incident	1.2		1.2	475	570	3
9/30/14	Elder, Timothy	Talk with REDACTED re status of Partnership at national level	0.2		0.2	475	95	3
10/3/14	Elder, Timothy	Take call from another NFBIC member who experienced a denial; add notes and do intake; send to co-counsel	0.7		0.7	475	332.5	3
10/4/14	Elder, Timothy	Review supporting documents forwarded by witness	0.5		0.5	475	237.5	3
10/6/14	Elder, Timothy	Review recent regulatory developments to Uber at PUC; communicate with parties interested in legislation; advise NFBIC on affect of legislative efforts on judicial matter; discuss matter with CAGDU	1.9		1.9	475	902.5	3
10/10/14	Elder, Timothy	Talk with interested individuals at NFBIC convention; present issue to NFBIC convention	1	No Charge	0	475	0	3
10/13/14	Elder, Timothy	Review docket entries; research background on Uber counsel	0.2		0.2	475	95	3
10/14/14	Elder, Timothy	Contact NFB national re status of negotiations	0.2		0.2	475	95	3
10/15/14	Elder, Timothy	Interview REDACTED re status of allegations for Amended Complaint	0.5		0.5	475	237.5	3
10/17/14	Elder, Timothy	Follow up on potential intakes re declarations	0.2		0.2	475	95	3
10/19/14	Elder, Timothy	Review REDACTED intake re Amended Complaint allegations	0.1		0.1	475	47.5	3
10/22/14	Elder, Timothy	Review PUC filings to locate items for discovery/requests	0.7		0.7	475	332.5	3
10/24/14	Elder, Timothy	Attend conference call with DRA to discuss next steps on opposing Uber's motion	0.9		0.9	475	427.5	3
10/24/14	Elder, Timothy	Review docket entries filed; calendar items to do; organize case file	0.3		0.3	475	142.5	3
10/24/14	Elder, Timothy	Review Def's MTD; analyze and make notes of potential counter arguments; discuss motion with DOJ	1.6		1.6	475	760	3
10/28/14	Elder, Timothy	Talk with REDACTED re status of Amended Complaint and new allegations	0.9		0.9	475	427.5	3
10/28/14	Elder, Timothy	Research associational standing issues raised in def's mtd	0.3		0.3	475	142.5	3
10/29/14	Elder, Timothy	Review local rules; discuss scheduling order with DOJ	0.5		0.5	475	237.5	3
10/29/14	Elder, Timothy	Return calls for individuals who were denied access to include in Complaint	1.2		1.2	475	570	3
10/30/14	Elder, Timothy	Return calls for individuals who were denied access to include in Complaint; interview potential additional plaintiffs	3.5		3.5	475	1662.5	3
11/1/14	Elder, Timothy	Review emails and communications from co-counsel re amended complaint and scheduling order; review notes for M Kelly Plaintiff	0.7		0.7	475	332.5	3
11/3/14	Elder, Timothy	Talk with REDACTED re status of amended complaint and parties	0.5		0.5	475	237.5	3
11/3/14	Elder, Timothy	Investigate Uber's compliance with PUC rules and regulations	0.9		0.9	475	427.5	3
11/4/14	Elder, Timothy	Attend PUC hearing to investigate Uber's statements on document retention and admissions	1.5		1.5	475	712.5	3
11/5/14	Elder, Timothy	Talk with REDACTED re litigation strategy; send email to DRA re same	0.5		0.5	475	237.5	3
11/6/14	Elder, Timothy	Discuss amendments to Complaint with M Nunez	0.3		0.3	475	142.5	3
11/7/14	Elder, Timothy	Call individuals to gather facts for amended complaint; edit document for amended complaint; review chart of denials; compile description of new facts for amended complaint; verify facts with each NFBIC member; verify membership status	7.8		7.8	475	3705	3
11/9/14	Elder, Timothy	Edit Amended Complaint; review intake notes; call declarants	6.7		6.7	475	3182.5	3
11/10/14	Elder, Timothy	Talk with M Nunez re filing FAC	0.2		0.2	475	95	3

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11/10/14	Elder, Timothy	Edit Amended Complaint; read cases on ADA standing; review case notes for declarants; send notes to co-counsel	2.4		2.4	475	1140	3
11/10/14	Elder, Timothy	Speak with DOJ re intervention (4); review and research related Uber cases; send note to DOJ	1		1	475	475	3
11/11/14	Elder, Timothy	Speak with M Nunez re factual issues in FAC	0.6		0.6	475	285	3
11/12/14	Elder, Timothy	Edit final draft of Amended Complaint; send notes to co-counsel with changes; ask questions of co-counsel re legal theories; verify facts with individuals	3.6		3.6	475	1710	3
11/17/14	Elder, Timothy	Communicate with Plaintiffs and declarants on status of complaint amendments; send note to NFB	1		1	475	475	4
11/20/14	Elder, Timothy	Review Twitter responses re news coverage of A Dixon's experience; communicate with potential declarants	1.2		1.2	475	570	4
12/4/14	Elder, Timothy	Talk with M Nunez re status of Uber's MTD	0.2		0.2	475	95	4
12/5/14	Elder, Timothy	Attend conference call with DRA to distribute work assignments and discuss legal theories of opposition brief	0.9		0.9	475	427.5	4
12/5/14	Elder, Timothy	Read through recent docket filings by Uber; comb over arguments in 32 page MTD; review voluminous evidence material appended to motion	1.2		1.2	475	570	4
12/8/14	Elder, Timothy	Call DOJ re intervention status; investigate facts re status of ownership interest in vehicles; download evidence from Uber website	1.3		1.3	475	617.5	4
12/10/14	Elder, Timothy	Review joint filing draft; calendar new dates per disclosures	0.2		0.2	475	95	4
12/11/14	Elder, Timothy	Talk with DOJ about intervention; send analysis to legal team re DOJ and legal theories of Title III	0.5		0.5	475	237.5	4
12/11/14	Elder, Timothy	Review related litigation filed against Uber by SF and LA DA	0.5		0.5	475	237.5	4
12/12/14	Elder, Timothy	Draft section of opposition on Uber's MTD; draft opp to Uber's request for judicial notice	6.5		6.5	475	3087.5	4
12/14/14	Elder, Timothy	Read cases for sections of opposition brief; review FFP and Rutter practice guides; continue drafting sections of brief	6.8		6.8	475	3230	4
12/15/14	Elder, Timothy	Review consolidated draft of opposition brief; read cited cases; research issues on DPA standing and deterrence claims; review cases on multiple legal theories not ground to dismiss cause of action	6.4		6.4	475	3040	4
12/16/14	Elder, Timothy	Edit sections of opposition brief; review cases on independent legal theories	5.8		5.8	475	2755	4
12/16/14	Elder, Timothy	Talk with M Nunez re status of brief opposition	0.4		0.4	475	190	4
12/17/14	Elder, Timothy	Edit opposition brief alongside co-counsel; propose edits; send brief to DOJ; send brief to clients; discuss items for hearing	7.8		7.8	475	3705	4
12/23/14	Elder, Timothy	Review DOJ Statement of Interest re MTD; answer telephone calls re same; review Twitter points re same; communicate with DOJ attorney	1.5		1.5	475	712.5	4
1/5/15	Elder, Timothy	Read SF and LA DA consumer complaint filed against Uber in state court; consider collaborations with same	0.3		0.3	475	142.5	4
1/6/15	Elder, Timothy	Take call from blind person REDACTED reporting incident of discrimination by Boston driver	0.5		0.5	475	237.5	4
1/7/15	Elder, Timothy	Call SFDA re recent consumer complaint as related to MTD; call DOJ re same; read pleadings in SFDA's matter; review case documents re same; compose external litigation memo to team	2.3		2.3	475	1092.5	4
1/9/15	Elder, Timothy	Prepare for motion hearing with MN and JM from DRA; discuss additional research assignments in response to Uber reply brief	0.9		0.9	475	427.5	4
1/9/15	Elder, Timothy	Talk with Plaintiffs about hearing and facilitate appearances; answer questions and explain potential outcomes of hearing	0.9		0.9	475	427.5	4
1/12/15	Elder, Timothy	Discuss arrangements with NFB collaboration with Uber and impact on NFBC standing at hearing	0.4		0.4	475	190	4
1/14/15	Elder, Timothy	Talk with plaintiff's counsel from other Uber cases re arbitration; review dockets; search for handling of similar issues for Uber's instant MTD on arbitration basis; briefly speak with J Marx on same (2)	1.6		1.6	475	760	4

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1/19/15	Elder, Timothy	Send emails to people to attend hearing; review court docket; review database of interested dog users in area; revise database with current contact; prepare for hearing; call clerk	2.9		2.9	475	1377.5	4
1/19/15	Elder, Timothy	Review advisor agreement between NFB national and Uber; make comments re same as per standing arguments on MTD	0.4		0.4	475	190	4
1/20/15	Elder, Timothy	Prepare for hearing; read Cousins docket opinions on related issues; compose memo re results of same	1.4		1.4	475	665	4
1/20/15	Elder, Timothy	Scramble to alert clients and interested members regarding rescheduled date of hearing; discuss with M Nunez; call court clerk; work on stip with defense counsel	1.5		1.5	475	712.5	4
1/21/15	Elder, Timothy	Read recent cases on ADA Title III standing and deterrence claims; speak with other senior attorney; take short call from M Nunez re same	0.8		0.8	475	380	4
1/21/15	Elder, Timothy	Take calls from users with complaints about denial of service	0.7		0.7	475	332.5	4
1/27/15	Elder, Timothy	Review letter to court; make edits; call clients to inform of new time/location of hearing; compose corrected announcement to community; take intake call re passenger who was recently turned away by Uber driver; review Uber's arguments and briefs in related cases	1.9		1.9	475	902.5	4
2/3/15	Elder, Timothy	Prepare for hearing; communicate with community members and organizations regarding attendance at hearing; respond to further intakes of discrimination	1.5		1.5	475	712.5	4
2/6/15	Elder, Timothy	Respond to individuals who contacted legal team regarding reports of discrimination by drivers; discuss case with other community leaders	1.5		1.5	475	712.5	4
2/11/15	Elder, Timothy	Talk with M Nunez re preparations for clients at hearing; review emails about hearing from blind community members who want to attend	0.6		0.6	475	285	4
2/14/15	Elder, Timothy	Reach out and respond to inquiry from Mass. Attorney General	0.5		0.5	475	237.5	4
2/16/15	Elder, Timothy	Process intakes and inquiries re accessibility of Uber website and complaint form;	0.9		0.9	475	427.5	4
2/17/15	Elder, Timothy	Prepare for hearing; outline legal arguments and case citations	5.5		5.5	475	2612.5	4
2/19/15	Elder, Timothy	Prepare for hearing; organize arguments; review cases and legal authority	6.5		6.5	475	3087.5	4
2/20/15	Elder, Timothy	Research case law on associational standing and arbitration in prep for hearing arguments on MTD; work on argument outline	8		8	475	3800	4
2/21/15	Elder, Timothy	Continue working on argument outline for MTD hearing; discuss cases with M Nunez; read new research on issues for standing and Oregon Ariana line of arguments for organizational standing	7.7		7.7	475	3657.5	4
2/22/15	Elder, Timothy	Prepare for moot argument; organize outline of case authorities; read cases re Unruh Act deterrence claims; review evidence in case; respond to co-counsel re items	9.8		9.8	475	4655	4
2/23/15	Elder, Timothy	Attend moot argument; withdraw (4.0); prepare for moot and debrief with notes from moot; read cases noted in moot argument; revise notes for hearing	9		9	475	4275	4
2/24/15	Elder, Timothy	Respond to individuals who have complaints of denial; review issues with NFB national; review Facebook notes re denial stories;	2.1		2.1	475	997.5	4
2/24/15	Elder, Timothy	Take calls and emails from more blind intakes who were denied rides	1		1	475	475	4
2/27/15	Elder, Timothy	Prepare for hearing; call clients to facilitate attendance and details	1.2		1.2	475	570	4
2/28/15	Elder, Timothy	Prepare for hearing argument; review additional research; present issue to REDACTED re Boston denials	8.5		8.5	475	4037.5	4
3/1/15	Elder, Timothy	Review cases from briefs in prep for motion hearing; refine arguments outline;	4.1		4.1	475	1947.5	4
3/2/15	Elder, Timothy	Research outstanding issues on Westlaw	2.5		2.5	475	1187.5	4
3/2/15	Elder, Timothy	Attend second moot argument on MTD hearing material and cases	0.4		0.4	475	190	4
3/3/15	Elder, Timothy	Discuss facts of deterrence with M Hingson	6.8		6.8	475	3230	4
3/3/15	Elder, Timothy	Prepare for hearing on site at court; meet with clients; attend hearing and argue before judge; attend meeting with clients after hearing	1.7		1.7	475	807.5	4
3/4/15	Elder, Timothy	Respond to calls and questions re status of motions hearing and judge's decision	1.5		1.5	475	712.5	4
3/6/15	Elder, Timothy	Respond to intakes re Uber denials	5.5		5.5	475	2612.5	4
3/9/15	Elder, Timothy	Communicate with more intakes re denials from around the country; update database; take calls from intakes re denials; interview declarants	5.5		5.5	475	2612.5	4
3/11/15	Elder, Timothy	Speak with intakes re denials	1.1		1.1	475	522.5	4

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3/12/15	Elder, Timothy	Review article on buz feed with client quote	0.8		0.8	475	380	4
3/17/15	Elder, Timothy	Discuss case with various individuals and clients per allergy issue; review recent case filing re related legal issues	1.8		1.8	475	855	4
3/26/15	Elder, Timothy	Talk with DOJ attorney re status of motion and arguments	0.5		0.5	475	237.5	4
4/3/15	Elder, Timothy	Talk with AZ at DRA re discovery plans and General Order 56; discuss status of case with various individuals at NFB	1.2		1.2	475	570	4
4/8/15	Elder, Timothy	Attend global discovery planning meeting at DRA with legal team; discuss prospect of General Order 56 and how to leverage discovery requests; analyze case strategy going forward given legal arguments	2.1		2.1	475	997.5	4
4/8/15	Elder, Timothy	Develop list of discovery requests for case; chart discovery plan for case; send letter to co-counsel re same; prepare for meeting with DRA re discovery plan	3.2		3.2	475	1520	4
4/9/15	Elder, Timothy	Take call from transportation advocate re status of Uber case; discuss issues of claims and consider further investigation	0.7		0.7	475	332.5	4
4/17/15	Elder, Timothy	Work with A Zisser re co-counsel amendments; talk with driver as part of investigation	1		1	475	475	4
4/18/15	Elder, Timothy	Review court's ruling on Uber's motion to dismiss; send analysis of implications and comments to clients and interested parties; review litigation calendar for deadlines	1.2		1.2	475	570	6
4/20/15	Elder, Timothy	Take calls from intakes re case change status; discuss with DRA; call NFB re various member contacts; review articles online; review summary of other Uber litigation developments	2.2		2.2	475	1045	6
4/21/15	Elder, Timothy	Edit press release per feedback from team; review articles on Motion to Dismiss decision	0.9		0.9	475	427.5	6
4/21/15	Elder, Timothy	Answer questions from clients and interested members of NFB re court's decision on motion to dismiss	0.5		0.5	475	237.5	6
4/22/15	Elder, Timothy	Prepare for scheduling initial inspection; prepare background research on letters for General Order 56 Letter on topics for inspection; draft 30b6 expert designee topics re policies and practices; edit same	4.1		4.1	475	1947.5	5
4/27/15	Elder, Timothy	Talk with M Nunez re status of PR campaign by Uber and fact witnesses; take call from interested person	0.5		0.5	475	237.5	6
4/28/15	Elder, Timothy	Review regulatory and legislative updates on TNC law in MA that might affect CA claims and issues for MA witnesses; review law and discuss with MA NFB member REDACTED	0.8		0.8	475	380	6
4/29/15	Elder, Timothy	Work on amendments and additions to initial disclosures; review documents and emails with list of over 40 witnesses; send follow up emails to witnesses who did not send supporting documentation; review Twitter tags re denials of service; prepare to do joint inspection	4.2		4.2	475	1995	6
5/4/15	Elder, Timothy	Evaluate pros/cons and ethics of interviewing Uber driver to examine app functionality	0.9		0.9	475	427.5	6
5/5/15	Elder, Timothy	Attend call with DRA and RBG re status and strategy for joint inspection and case development	1.4		1.4	475	665	5
5/5/15	Elder, Timothy	Review Uber's Answer; make chart of unreasonable denials; share with team; compare Answer to Complaint; review Rule 15; review emails re same from legal team	2.1		2.1	475	997.5	6
5/6/15	Elder, Timothy	Prepare for joint inspection	0.9		0.9	475	427.5	5
5/7/15	Elder, Timothy	Talk with REDACTED re additional denials and statements from drivers in Austin	0.5		0.5	475	237.5	6
5/8/15	Elder, Timothy	Attend joint inspection with Uber at Litter's offices with LP and MN; discuss settlement terms and ask questions re policies	2.2		2.2	475	1045	5
5/8/15	Elder, Timothy	Review Uber's docs produced in disclosures; talk with various clients and M Nunez re prep and post for joint inspection	3.8		3.8	475	1805	5
5/10/15	Elder, Timothy	Sort through email discussions of settlement terms; read Judge Chen's Order on employee/independent contractor status; compare schedule of dockets to interpolate effect of one case on the other	1.1		1.1	475	522.5	5

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5/12/15	Elder, Timothy	Process intake from REDACTED; review emails; send comments to legal team	0.8		0.8	475	380	5
5/14/15	Elder, Timothy	Interview witnesses with denials and testimony of Uber's responses; review docs from REDACTED	1.5		1.5	475	712.5	6
5/14/15	Elder, Timothy	Review summary of joint inspection; add notes; review bios of mediators; respond to additional complaints of discrimination	1.8		1.8	475	855	5
5/15/15	Elder, Timothy	Prepare for mediation brief; review emails to cite in brief; send to team; prep for drafting of settlement agreement; collect emails from REDACTED	0.8		0.8	475	380	5
5/18/15	Elder, Timothy	Take calls from additional Uber complaints; interview REDACTED and REDACTED; call REDACTED; forward intakes for paralegal to interview	1.5		1.5	475	712.5	6
5/19/15	Elder, Timothy	Talk with Julia Marx re intake protocols; return call from REDACTED re denials; review intake from other calls and emails including REDACTED and REDACTED	2.4		2.4	475	1140	6
5/22/15	Elder, Timothy	Talk with REDACTED from Abilene re Uber in TX; respond to inquiries re intakes for REDACTED and REDACTED; review emails from additional denials via Hingson referrals	2.5		2.5	475	1187.5	6
5/26/15	Elder, Timothy	Work on drafting joint CMC and then stip after hearing from co-counsel; review local rules; edit joint stip; attend phone call with M Nunez and J Marx to work out what to do by court's CMC statement deadline	1.3		1.3	475	617.5	6
5/26/15	Elder, Timothy	Process intake calls for REDACTED and others on NAGDU list; return their calls and emails; discuss same with M Hingson	1.2		1.2	475	570	6
5/27/15	Elder, Timothy	Review profiles of Uber's proposed mediators; discuss with Plaintiff's counsel; review and compare drafts of stip to continue CMC; schedule further inspection with Uber engineer; discuss various to-do items with M Nunez	1.1		1.1	475	522.5	5
5/27/15	Elder, Timothy	Review docket filings; catch up on case emails	0.5		0.5	475	237.5	6
5/29/15	Elder, Timothy	Take calls from various intakes; call REDACTED and others to assign to paralegal intake	1.6		1.6	475	760	6
5/29/15	Elder, Timothy	Take call from MA AG re status of litigation and AG interest in action in Boston	0.5		0.5	475	237.5	6
6/3/15	Elder, Timothy	Research background on proposed mediators	0.5		0.5	475	237.5	5
6/8/15	Elder, Timothy	Talk with clients re terms of settlement and potential mediation dates; call REDACTED and M Hingson re travel and amended retainer	1		1	475	475	5
6/8/15	Elder, Timothy	Call intakes REDACTED and others re inquiries for potential denials; review supporting documentation; arrange for paralegal interviews; respond to emails from NAGDU and other denials who responded	2.1		2.1	475	997.5	6
6/8/15	Elder, Timothy	Talk with M Kelly re mediation and settlement terms	0.5		0.5	475	237.5	5
6/9/15	Elder, Timothy	Take call from REDACTED re denials and questions about suit	0.3		0.3	475	142.5	6
6/10/15	Elder, Timothy	Take call with Uber intake from LA REDACTED	0.2		0.2	475	95	6
6/11/15	Elder, Timothy	Process intakes with REDACTED on Facebook; call REDACTED re email inquiry REDACTED; forward other intakes to legal team; review complaints from Marvland passengers about cleaning fees	0.6		0.6	475	285	6
6/15/15	Elder, Timothy	Attend Accessible World live chat room to review statements by Mike May and K Marshal re service animal policies	1.1		1.1	475	522.5	6
6/15/15	Elder, Timothy	Respond to Uber denials REDACTED	0.7		0.7	475	332.5	6
6/17/15	Elder, Timothy	Review issues coming up regarding disclosures of nation-wide witnesses or limit to CA witnesses; review list of names and database; prepare for inspection with Uber engineer; review list of questions	1.3		1.3	475	617.5	6
6/18/15	Elder, Timothy	Review recent appeal from Uber re order on employee status; analyze decision for settlement leverage and issues affecting relief	0.3		0.3	475	142.5	5
6/18/15	Elder, Timothy	Prepare for inspection with Uber engineers; attend meeting with Uber engineers and legal team; debrief with M Nunez and M Bian re same	4.1		4.1	475	1947.5	5
6/22/15	Elder, Timothy	Review summaries of various intakes of new denials; discuss scope of disclosure with team	0.2		0.2	475	95	6
6/24/15	Elder, Timothy	Review legal memo on the support for position that cleaning fee policy should be within scope of settlement; review contract for mediation; communicate with clients re same	0.6		0.6	475	285	5

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7/3/15	Elder, Timothy	Catch up on responding to Uber intakes REDACTED and other email inquiries; respond to individuals; review notes of inspection for policies; write legal team re list of outstanding items promised but not delivered from Uber engineer meeting; answer emails regarding CMC; schedule calendar for mediation and CMC meet/confer	4.3		4.3	475	2042.5	5
7/6/15	Elder, Timothy	Present regarding lawsuit at NFB convention NAGDU meeting; discuss denials with several individuals REDACTED at convention; observe denials via twitter NFB hashtag; follow up with those members; review denial incidents on site	3.7	No Charge	0	475	0	6
7/10/15	Elder, Timothy	Discuss terms of settlement proposal with M Hingson	0.7		0.7	475	332.5	5
7/14/15	Elder, Timothy	Review draft filings for disclosures of interested parties and supplemental disclosures	0.4		0.4	475	190	6
7/14/15	Elder, Timothy	Talk with Wash. Lawyers Committee on Civil Rights re persuading it to not file Uber copy cat case	0.6		0.6	475	285	6
7/15/15	Elder, Timothy	Prepare for CMC 26(f) conference meet and confer with opposing counsel	1.2		1.2	475	570	6
7/15/15	Elder, Timothy	Attend CMC 26f meet/confer with opposing counsel and Plaintiff's legal team (5); attend follow up conference call to discuss settlement terms and discovery issues (7)	1.2		1.2	475	570	5
7/15/15	Elder, Timothy	Read recent press coverage of lawsuit on Wired; discuss potential interview opportunities with legal team; review CMC joint statement	2		2	475	950	6
7/16/15	Elder, Timothy	Review edits to joint CMC statement; review discovery docs for disclosure purposes	0.6		0.6	475	285	6
7/17/15	Elder, Timothy	Process intakes and send to paralegal for interviews; review and gather supporting documents for various individuals	0.5		0.5	475	237.5	6
7/17/15	Elder, Timothy	Review final draft of CMC and discovery plan documents; make changes to case notes for discovery ideas	0.4		0.4	475	190	6
7/21/15	Elder, Timothy	Review draft discovery and discovery letters	0.8		0.8	475	380	6
7/24/15	Elder, Timothy	Review intakes for REDACTED in prep for case management; review emails from intakes; modify intake process used by paralegal	0.9		0.9	475	427.5	6
7/25/15	Elder, Timothy	Review article where Uber spokesperson makes statement about religious and allergies exceptions; reach out and respond to various intakes REDACTED; send note to NFB state presidents list	1.5		1.5	475	712.5	6
7/28/15	Elder, Timothy	Talk with MA AG re REDACTED; review data re same to report to MA AG	0.5		0.5	475	237.5	5
7/30/15	Elder, Timothy	Review courts scheduling order on discovery; read filed version of CMC statement; calendar items to do	0.7		0.7	475	332.5	6
7/31/15	Elder, Timothy	Follow up on intake inquiries from Seeing Eye Google group	0.5		0.5	475	237.5	6
7/31/15	Elder, Timothy	Review draft of mediation brief; make substantial edits	3.8		3.8	475	1805	5
8/3/15	Elder, Timothy	Review discovery claim chart; make edits; compose additional discovery requests; send analysis re disparate impact on rating numbers; take call from clients and intakes	1.4		1.4	475	665	6
8/4/15	Elder, Timothy	Talk with M Pedersen; prepare for mediation	0.9		0.9	475	427.5	5
8/5/15	Elder, Timothy	Review filings in other cases related to Coleman witness and discovery; make notes for drafting discovery requests related to driver control and mandatory training	1.1		1.1	475	522.5	6
8/6/15	Elder, Timothy	Review status of class certification hearing in employee/independent contractor case as it affects settlement leverage	0.5		0.5	475	237.5	6
8/7/15	Elder, Timothy	Prepare for mediation on conference call with full legal team and M Willows and M Hingson; discuss various substance on which we are willing to compromise	0.9		0.9	475	427.5	5
8/7/15	Elder, Timothy	Prepare for mediation on call with DRA; attend short call (2) with mediator to prepare for session	0.9		0.9	475	427.5	5
8/10/15	Elder, Timothy	Prepare for mediation in transit; review Uber's materials; call client's	0.9		0.9	475	427.5	5
8/10/15	Elder, Timothy	Attend mediation session all day	8		8	475	3800	5
8/11/15	Elder, Timothy	Review recent access complaint against Uber in NYC	0.4		0.4	475	190	6

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8/13/15	Elder, Timothy	Process intakes re additional denials; talk with declarants; schedule interviews with paralegals	0.4		0.4	475	190	6
8/13/15	Elder, Timothy	Review discovery requests; compare analysis for CMC and discovery in email threads	0.7		0.7	475	332.5	6
8/15/15	Elder, Timothy	Reach out on Twitter to various denied individuals; review IBTimes article; locate individuals who were reported as denials in article via Twitter and web search	0.9		0.9	475	427.5	6
8/17/15	Elder, Timothy	Process intakes re denials for REDACTED return calls to REDACTED from Portland; refer REDACTED out	2.1		2.1	475	997.5	6
8/18/15	Elder, Timothy	Compose settlement agreement draft	7.1		7.1	475	3372.5	5
8/19/15	Elder, Timothy	Continue composing settlement draft document; review outlines and notes of settlement discussions; incorporate terms into agreement text; send first final draft to team	6.8		6.8	475	3230	5
8/20/15	Elder, Timothy	Talk with M Bien re settlement draft	0.4		0.4	475	190	5
8/24/15	Elder, Timothy	Take call from individual in Maryland re drivers refusing to help blind passengers find car; talk with M Kelly re REDACTED	0.7		0.7	475	332.5	6
8/25/15	Elder, Timothy	Talk with REDACTED re more denials; call in response to inquiries about denials	0.7		0.7	475	332.5	6
8/25/15	Elder, Timothy	Take intake calls from REDACTED asking about status of case	0.5		0.5	475	237.5	6
8/27/15	Elder, Timothy	Work on edits to settlement draft	0.4		0.4	475	190	5
8/28/15	Elder, Timothy	Process intake inquiries REDACTED and others; schedule paralegal to do full intake	0.5		0.5	475	237.5	6
8/30/15	Elder, Timothy	Edit settlement draft per team's feedback; research accessibility standard for WAH-ARIA; make recommendations	4.8		4.8	475	2280	5
8/31/15	Elder, Timothy	Talk with Andrew S re Uber's position on certain terms	0.1		0.1	475	47.5	5
9/16/15	Elder, Timothy	Talk with legal team re settlement; call Andrew S re status of counter proposal	0.2		0.2	475	95	5
9/21/15	Elder, Timothy	Process more intakes of denials on Uber platform	0.4		0.4	475	190	6
9/22/15	Elder, Timothy	Review drafts of discovery responses; compare with claim chart and pleadings; edit RFPs, RFAs, PMK notice and interrogatories; send comments and questions to legal team for further revisions	4.7		4.7	475	2232.5	6
9/22/15	Elder, Timothy	Attend conference call with legal team to go over scheduling order issues and discuss next steps in discovery and scheduling; assign tasks for submitting proposed schedule and serving first round of discovery requests; go over witness list for depositions	1		1	475	475	6
9/25/15	Elder, Timothy	Review scheduling order; calendar deadlines; prepare to propound first round of discovery requests	0.3		0.3	475	142.5	6
9/28/15	Elder, Timothy	Take call from Andrew re Uber's feedback; send summary memo to legal team; request conference call	0.7		0.7	475	332.5	6
9/28/15	Elder, Timothy	Attend call with legal team to get consensus on Uber class settlement and terms; review notes; reach out to Uber's counsel to move settlement forward	1.4		1.4	475	665	5
9/29/15	Elder, Timothy	Answer emails re settlement terms; process questions from declarants re monetary relief	0.3		0.3	475	142.5	5
9/30/15	Elder, Timothy	Talk with Andrew re settlement progress; send summary to legal team	0.3		0.3	475	142.5	5
9/30/15	Elder, Timothy	Edit discovery requests per Julia's comments; make changes to final versions; send summary to legal team re several scoping issues; meet with Julia M and Mike N re changes to rogs (3); review final versions of PMK notice; meet/confer with Uber counsel re dates for PMK depositions; approve final draft of RFAs	3.3		3.3	475	1567.5	6
10/2/15	Elder, Timothy	Talk with experienced class litigators re arbitration issues	0.3		0.3	475	142.5	6
10/7/15	Elder, Timothy	Review email from opposing counsel re new terms from Uber driver agreement; send comments to legal team	0.2		0.2	475	95	5
10/8/15	Elder, Timothy	Review proposed language for Uber drivers re service animals; discuss with legal team re email; enter edits; write response letter to opposing counsel; contact clients re talk about duties as class rep in settlement; discuss progress of injunctive changes with M Willows; call M Kelly re scheduling class duties conference	2.3		2.3	475	1092.5	5

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10/9/15	Elder, Timothy	Research on Westlaw re the ability of class rep to waive arbitration of injunctive relief for class; call M Nunez re update on his research; compose memo to legal team re same	3.4		3.4	475	1615	5
10/13/15	Elder, Timothy	Discuss class settlement approval issues with legal team	0.4		0.4	475	190	5
10/14/15	Elder, Timothy	Attend call with M Nunez and NFB class reps to explain duties of class reps and answer questions re timelines and status of settlement terms	0.8		0.8	475	380	6
10/14/15	Elder, Timothy	Call NFB and clients re class settlement issues; talk about class retainer with M Nunez; talk about changes to settlement terms with NFB national; review Wal-Mart Duker arguments re 23b2 opt-out issues	2.8		2.8	475	1330	5
10/15/15	Elder, Timothy	Talk with Jocelyn Larkin at Impact Fund re issues with class settlement approval	0.3		0.3	475	142.5	5
10/15/15	Elder, Timothy	Attend call with M Pedersen re duties of a class rep; discuss settlement progress and options for class relief; attend separate call with M Kelly re same	1.1		1.1	475	522.5	5
10/19/15	Elder, Timothy	Call opposing counsel re settlement question; process more complainants from denied passengers REDACTED	0.4		0.4	475	190	5
10/20/15	Elder, Timothy	Review draft class retainer amendment for certification on settlement	0.2		0.2	475	95	5
10/20/15	Elder, Timothy	Talk with REDACTED on NFB's concerns for Uber settlement terms	0.5		0.5	475	237.5	5
10/22/15	Elder, Timothy	Go over concerns from NFB national for REDACTED ; call staff at NCB re same; talk with REDACTED re same	1.1		1.1	475	522.5	5
10/22/15	Elder, Timothy	Compile list of Uber employee fact witnesses to schedule depositions on calendar and draft notices	0.3		0.3	475	142.5	6
10/22/15	Elder, Timothy	Talk with M Nunez re PMK depo strategy and outline	0.4		0.4	475	190	6
10/27/15	Elder, Timothy	Draft letter to opposing counsel; review draft joint CMS; review witness list and notice of depositions; calculate depo time needed	1		1	475	475	6
10/29/15	Elder, Timothy	Review calendaring of vacated CMC; schedule discovery items	0.2		0.2	475	95	6
10/31/15	Elder, Timothy	Review items for additional discovery request for inspection; process Uber intakes; discuss at CAGDU with update on discovery	0.9		0.9	475	427.5	6
11/3/15	Elder, Timothy	Go over written discovery/draft request for inspection; review qualifications of potential expert report author; analyze effect of requested discovery extension on PMK depo	0.5		0.5	475	237.5	6
11/5/15	Elder, Timothy	Talk with witness re current status; process further intakes re witnesses experiences; deal with meet and confer for failure to produce by Uber	1.5		1.5	475	712.5	6
11/8/15	Elder, Timothy	Prepare for fact witness depositions; discuss same with M Nunez by email	0.7		0.7	475	332.5	6
11/12/15	Elder, Timothy	Attend meet/confer call with M Nunez J Marx and opposing counsel; discuss settlement impact on discovery; go over discovery dispute issues	0.5		0.5	475	237.5	5
11/12/15	Elder, Timothy	Attend planning meeting with full legal team to go over discovery items and general strategy for meet and confer; go over potential limits on discovery requests	1		1	475	475	6
11/13/15	Elder, Timothy	Discuss intake with REDACTED in DC; go over potential claims	0.5		0.5	475	237.5	6
11/16/15	Elder, Timothy	Review meely/confer letter/draft from M Nunez; send comments; review qualifications of potential experts for expert report on industrial relations	0.8		0.8	475	380	6
11/20/15	Elder, Timothy	Work with experts' CV and preferences to ensure evidence captured allows for opinion and scope of PMK depositions includes comparator policies	0.5		0.5	475	237.5	6
11/24/15	Elder, Timothy	Attend call with legal team to go over discovery issues and discuss latest settlement draft; go over additional discovery needed for depositions and expert	1		1	475	475	6
11/25/15	Elder, Timothy	Prepare for depositions; review written discovery requests that are relevant to depo	3.9		3.9	475	1852.5	6
11/30/15	Elder, Timothy	Attend conference call with team re: settlement feedback terms and staying discovery per settlement	0.6		0.6	475	285	5
12/1/15	Elder, Timothy	Edit settlement terms in next version of draft; reconcile revisions from DBA and RBG; attend call with legal team and OC (.7); talk over expanding settlement to national class with REDACTED ; discuss REDACTED with same	5.2		5.2	475	2470	5

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12/2/15	Elder, Timothy	Continue editing settlement agreement; go over proposed changes to settlement class definition with co-counsel; compose electronic notice provisions for class action; write letter to Spurchese re settlement; compare settlement terms to previous class action agreements approved by courts	6.1		6.1	475	2897.5	5
12/8/15	Elder, Timothy	Go over drafts of settlement addendum with M Nunez	0.5		0.5	475	237.5	5
12/8/15	Elder, Timothy	Meet with expert Dr. Martell re scope of discovery to inform his opinion (includes M Nunez and LP)	1.8		1.8	475	855	6
12/10/15	Elder, Timothy	Go over settlement terms with REDACTED; discuss REDACTED if cancer is terminal	1.1		1.1	475	522.5	5
12/12/15	Elder, Timothy	Go over next draft of Uber settlement; review Andrew's changes; list changes for our legal team to consider; analyze various positions to take on each point; confirm changes with clients	3.9		3.9	475	1852.5	5
12/14/15	Elder, Timothy	Go over settlement terms and compromise positions with DRA and M Nunez; gather consensus for negotiations with Andrew	1.3		1.3	475	617.5	5
12/15/15	Elder, Timothy	Go over settlement issues with clients; respond to interested parties to the extent allowed under confidentiality; continue drafting changes to incorporate Andrew's feedback; draft addendum 1 re pop-up; discuss same with M Pedersen; call M May re app functionality	6.1		6.1	475	2897.5	5
12/15/15	Elder, Timothy	Talk with Andrew re settlement terms	0.5		0.5	475	237.5	5
12/16/15	Elder, Timothy	Continue editing addendum per M Nunez feedback; discuss quiz screens; go over various drafts with legal team; call Andrew to discuss monetary terms	4.2		4.2	475	1995	6
12/20/15	Elder, Timothy	Answer call from M Kelly re incident with Uber driver who refused to take them until police arrived	0.7		0.7	475	332.5	6
12/29/15	Elder, Timothy	Prepare for hearing and review arbitration issue with senior arbitration expert; return calls from interested individuals in response to DOJ statement	0.8		0.8	475	380	6
12/31/15	Elder, Timothy	Review next revision set of draft from Uber; make analysis and comments to legal team	1.2		1.2	475	570	5
1/3/16	Elder, Timothy	Talk with LP and MB re settlement status	0.8		0.8	475	380	5
1/4/16	Elder, Timothy	Attend call with legal team and A Spurchese re settlement progress; attend post call debrief with LP and MB and MN re next steps	1.2		1.2	475	570	5
1/7/16	Elder, Timothy	Review next proposal of settlement terms; clear monetary amounts with NFB; give comments to legal team re settlement options; talk over issues with Mike Pedersen	1.8		1.8	475	855	5
1/13/16	Elder, Timothy	Review items for class cert approval	0.4		0.4	475	190	6
1/13/16	Elder, Timothy	Review next draft of proposal from defendant; discuss with M Nunez on way to CMC hearing; attend CMC hearing; call clients re approval on terms of settlement; talk with clients over settlement issues while traveling back from CMC hearing	3.5		3.5	475	1662.5	5
1/14/16	Elder, Timothy	Go over settlement terms with M Kelly; REDACTED ; discuss REDACTED with M Willows	0.8		0.8	475	380	5
1/15/16	Elder, Timothy	Read and review preliminary class settlement docs from other recent Uber class settlement; compare notes; make list of items that must be included in class prelm approval motion; answer call from M Pedersen re settlement	1.4		1.4	475	665	5
1/18/16	Elder, Timothy	Finish details on final version of settlement; check items; send final draft for client approval along with class rep duties	0.5		0.5	475	237.5	5
1/27/16	Elder, Timothy	Review sample preliminary approval order recently announced in Northern District re ADA for class settlement	0.5		0.5	475	237.5	5
2/4/16	Elder, Timothy	Process additional intakes; assign emails and interviews with paralegal for database of denials; talk with REDACTED	1.5		1.5	475	712.5	6
2/5/16	Elder, Timothy	Answer call from Gilbert law firm re additional Uber filing	0.4		0.4	475	190	6
2/6/16	Elder, Timothy	Review draft addendums; propose changes to team; talk with opposing counsel briefly re threat of filing in Virginia	0.7		0.7	475	332.5	5
3/1/16	Elder, Timothy	Edit addendums 3 and 4 to settlement agreement; send analysis to team; review 30 pages of current Uber training; make notes of defects	2.8		2.8	475	1330	5
3/10/16	Elder, Timothy	Talk with M Nunez and DRA re Uber class definition and scope of settlement	0.3		0.3	475	142.5	5

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3/15/16	Elder, Timothy	Compile notice and publication data for NFB and ACB publications for M Nunez to include in notice plan and prelim approval motion	1		1	475	475	5
3/17/16	Elder, Timothy	Look at Uber Black issue for scope of settlement terms; talk about unmatched driver/riders with M Hingson; review other reports of drivers being unmatched from passengers after a complaint	1.6		1.6	475	760	5
3/18/16	Elder, Timothy	Review and edit first draft of preliminary approval motion; communicate with clients for amended retainer per class counsel	2.3		2.3	475	1092.5	5
3/21/16	Elder, Timothy	Edit items in settlement agreement for prelim approval; talk with J Marx and M Nunez separately re same; check in with clients and Uber on blocked pairing issue; ask Uber re same; review client declarations and gather signatures	3.3		3.3	475	1567.5	5
3/23/16	Elder, Timothy	Make recommendations for several items in documents for preliminary approval of settlement; review voluminous email correspondence re changes and edits to various prelim. Approval filings; comment and send analysis to legal team; edit class counsel declaration; prepare for press release	3.7		3.7	475	1757.5	5
3/29/16	Elder, Timothy	Work to gather signatures; talk about final terms with clients; review press release; work on other preliminary approval matters	3		3	475	1425	5
3/31/16	Elder, Timothy	Work with clients on press release privilege and details of preliminary approval motion; talk with legal team re filing deadline; go over questions from REDACTED re settlement; review redlines to addendums	3.3		3.3	475	1567.5	5
4/4/16	Elder, Timothy	Edit settlement addendums per Uber redlines; discuss changes with team by email; send redlines to Uber	1.9		1.9	475	902.5	5
4/5/16	Elder, Timothy	Attend conference call with legal team to set trial schedule in prep for CMC if judge sees fit; discuss status of filings	0.7		0.7	475	332.5	6
4/5/16	Elder, Timothy	Edit addendums 3 and 5 per opposing counsel's redlines; incorporate legal team's feedback write summary letter to opposing counsel re same; prep for CMC and create new trial schedule per Nunez feedback	1.6		1.6	475	760	5
4/6/16	Elder, Timothy	Prepare for CMC; review scheduling orders in transit to hearing; call opposing counsel; attend hearing; summarize results of hearing and send to team in transit on return trip from court; call interested parties re same; finalize edits to addendums with Uber's approval	2.6		2.6	475	1235	5
4/7/16	Elder, Timothy	Call back various intakes REDACTED; enter information into database to start closing all outstanding loops in intake cue	2.1		2.1	475	997.5	6
4/11/16	Elder, Timothy	Work on class Notice and preliminary approval motion; review recent order from NDCA regarding Lyft Driver class settlement denied preliminary approval; edit and review SAC; write to opposing counsel	2.2		2.2	475	1045	5
4/11/16	Elder, Timothy	Talk with REDACTED re denials and possible settlement positions; intake denial information into database	0.5		0.5	475	237.5	5
4/13/16	Elder, Timothy	Work on final edits to Settlement agreement to make terms consistent with preliminary approval motion; go over changes proposed by Andrew S; send feedback for settlement press release editing for prelim filing	1.5		1.5	475	712.5	5
4/14/16	Elder, Timothy	Review draft Addendum 4 to settlement agreement; send comments to legal team; review other progress towards prelim approval filings	0.7		0.7	475	332.5	5
4/19/16	Elder, Timothy	Attend conference call with legal team in prep for CMC on 4/20; adapt discovery timelines	0.5		0.5	475	237.5	5
4/20/16	Elder, Timothy	Attend CMC for Uber with M Nunez; call Nunez after hearing and discuss summary	0.7		0.7	475	332.5	5
4/22/16	Elder, Timothy	Talk DRBA Texas lawyers out of filing against Uber per class settlement	0.5		0.5	475	237.5	5
4/26/16	Elder, Timothy	Close out all outstanding intakes; input existing intakes who have not received calls into database; respond to unanswered email inquiries from declarants	2.4		2.4	475	1140	6
4/27/16	Elder, Timothy	Review Uber's final round of redlines to complete settlement agreement; accept/reject line item edits in settlement agreement; attend conference call with legal team to discuss serious edits (1-2); talk with E O'Connor re changes (3); send emails re same; do further revisions to settlement per O'Connor feedback; discuss changes with team	7.9		7.9	475	3752.5	5

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4/28/16	Elder, Timothy	Proof final drafts of settlement addendums; prepare for filing final documents in class prelin approval papers; further revise settlement in response to bickering between LP and AS re release language; go over class rep issues with NFB GC based on "Advisor Agreement" proposed by Uber partner program; go over press release; prep clients on final approval; prepare signatures; review other necessary procedural motions; attend call with LP and AS (2); review stipulations for filing.	6.9		6.9	475	3277.5	5
4/29/16	Elder, Timothy	Talk with NFB PR re settlement issues that are ok to talk about; respond to emails re administrative matters for filing prelin. Approval papers; review final drafts of motions and prelin papers; compose edits to email for intakes who responded to our outreach efforts; talk about final details with NFB President	4.3		4.3	475	2042.5	5
5/6/16	Elder, Timothy	Respond to inquiries about preliminary settlement terms from clients and intakes; talk with NFB about same	1		1	475	475	7
5/6/16	Elder, Timothy	Answer questions from community and Hingson about settlement approval and how to react in interim; advise on impact of settlement so as to avoid community objections	0.6		0.6	475	285	7
5/17/16	Elder, Timothy	Attend conference call with DOJ and legal team to go over DOJ questions about settlement	0.7		0.7	475	332.5	7
5/19/16	Elder, Timothy	Talk with NFB rep re questions about possible objections from drivers with allergies	0.3		0.3	475	142.5	7
5/23/16	Elder, Timothy	Talk with NFB re ways to disseminate notice of terms of settlement to help community understand issues; go over draft with REDACTED	0.9		0.9	475	427.5	7
5/27/16	Elder, Timothy	Answer calls from new intakes and discuss settlement with REDACTED; review tip on Usurv app for class; respond to legal team re ramping down intake process	2.6		2.6	475	1235	7
6/3/16	Elder, Timothy	Review recent filing of service animal case in VA and analyze impact on class settlement; answer NFB's questions about how settlement will work in competing disability situations; go over fees for reporting at prelin approval hearing.	0.6		0.6	475	285	7
6/7/16	Elder, Timothy	Work on NFB outreach post for class notification; consult NFB's PR department on how to get the word out; review DOJ's consent to settlement filing	2		2	475	950	7
6/8/16	Elder, Timothy	Conduct intake with REDACTED; answer questions from her attorney	0.9		0.9	475	427.5	7
6/8/16	Elder, Timothy	Review fees numbers; run updated calculation on Lodestar	0.5		0.5	475	237.5	8
6/4/16	Elder, Timothy	Work with REDACTED on issues with settlement and cleaning fees	0.2		0.2	475	95	8
6/15/16	Elder, Timothy	Prep for preliminary approval hearing with clients; discuss fees and multipliers with co-counsel; compare law on multiplier for class settlement; locate information for timelines in class notice proposed schedule for feasible delivery	1.8		1.8	475	855	7
6/16/16	Elder, Timothy	Attend hearing with judge and legal team M Nunez and Larry Paradis (9); prepare client for hearing and debrief to explain results with clients (7); discuss assignment of follow-up tasks with legal team (3)	2		2	475	950	7
6/19/16	Elder, Timothy	Work on complying with court's request for additional briefing on state injunctive claims that are being released; discuss with national advocates and NFB counsel	0.7		0.7	475	332.5	7
6/20/16	Elder, Timothy	Attend meeting with legal team to check in on progress of research and discuss direction of group's assignments	0.5		0.5	475	237.5	7
6/20/16	Elder, Timothy	Call opposing counsel re supplemental briefing	0.1		0.1	475	47.5	7
6/21/16	Elder, Timothy	Go over notice deadlines and problem with notice with M Nunez; discuss same with NFB	0.3		0.3	475	142.5	7
6/21/16	Elder, Timothy	Hear complaints from REDACTED re San Diego and excessive denials and cancellation charges; review email complaints from other disabled riders	0.6		0.6	475	285	7
6/23/16	Elder, Timothy	Attend call with legal team re Uber's proposed filings and changes to settlement agreement	0.6		0.6	475	285	7
6/23/16	Elder, Timothy	Review materials from uber on changes to notice dates and settlement agreement; comment and analyze impact of Marks Declaration and Supplemental Brief; review stipulation and Uber's proposed changes to settlement agreement; send comments via email to team	1.4		1.4	475	665	7

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6/26/16	Elder, Timothy	Review changes to proposed notice schedule and stipulation; send edits to legal team with comments; review emails with various comments on how to get changes done by procedure given current proposed status of settlement	1		1	475	475	7
6/30/16	Elder, Timothy	Respond to inquiries during NFB national convention re status of settlement; answer urgent calls re denials of rides during convention; explain terms of settlement to class members at various meetings	4		4	475	1900	7
7/2/16	Elder, Timothy	Attend NAAGDU presentation with M Nunez	0.5	No Charge	0	475	0	7
7/6/16	Elder, Timothy	Take calls re potential criminal investigation into Uber denials at NFB convention; review video footage of denials	1.5	No Charge	0	475	0	7
7/11/16	Elder, Timothy	Review recent filings and proposed stipulation to modify class settlement; respond to various inquiries re grumblings at NFB convention; talk with M Hingson about settlement status	0.8		0.8	475	380	7
7/11/16	Elder, Timothy	Answer questions from REDACTED re scope of settlement and enforceability in REDACTED	0.7		0.7	475	332.5	7
7/15/16	Elder, Timothy	Review court's prelim approval order; calendar items to do to comply with order; send notice to certain parties	1		1	475	475	7
7/18/16	Elder, Timothy	Answer questions from NAAGDU re impact of arbitration on future claims	0.8		0.8	475	380	7
7/22/16	Elder, Timothy	Work on letter to all intakes re update on proposed settlement; prepare for notice in Braille formats; post notice on TRE Legal; edit email message to intakes; do other misc. tasks to comply with court's order on notice and schedule for final approval	3.5		3.5	475	1662.5	7
7/30/16	Elder, Timothy	Gather and start to review contested fee petitions	0.4		0.4	475	190	8
7/30/16	Elder, Timothy	Review KCC website for accessibility; note problem for class administrator to fix	0.5		0.5	475	237.5	7
8/1/16	Elder, Timothy	Work on complying with notice	0.5		0.5	475	237.5	8
8/1/16	Elder, Timothy	Take call from REDACTED re recent denials and impact of settlement	0.3		0.3	475	142.5	8
8/1/16	Elder, Timothy	Talk with RBG re Larry's departure and strategy for motion on fees and declarations	0.3	No Charge	0	475	0	8
8/2/16	Elder, Timothy	Work with NFB's publications team to ensure notice is properly delivered by Aug. 3 deadline; review settlement administrator's revised website for accessibility fixes	0.5		0.5	475	237.5	7
8/3/16	Elder, Timothy	Answer questions from class members about impact of settlement; take call from REDACTED re WA class members and p/W/d from WI re fake service animals	0.5		0.5	475	237.5	7
8/5/16	Elder, Timothy	Return calls from class members with questions about settlement; explain terms to REDACTED and others	1.4		1.4	475	665	7
8/7/16	Elder, Timothy	Review sample fee petitions for comparable cases; outline arguments and law	2.4	No Charge	0	475	0	8
8/8/16	Elder, Timothy	Schedule tasks for fee petition briefing; outline list of declarants and petition arguments/law	4.7		4.7	475	2232.5	8
8/11/16	Elder, Timothy	Talk with M Nunez re fee petition division of labor	0.3	No Charge	0	475	0	8
8/12/16	Elder, Timothy	Talk with M Nunez and J Marks re gathering declarations for fee petition	0.8		0.8	475	380	8
8/12/16	Elder, Timothy	Work on Goldstein and NDRN decs for fee petition	0.4		0.4	475	190	8
8/13/16	Elder, Timothy	Talk with complainant re settlement from Oregon REDACTED; explain settlement	0.5		0.5	475	237.5	7
8/13/16	Elder, Timothy	Repeat amended class notice; confirm notice is on track and review checklist of items	0.6		0.6	475	285	7
8/16/16	Elder, Timothy	Work to confirm declarants for fee petition; talk with NDRN attorney, AFB attorney and ACB attorney re declaration	1.6		1.6	475	760	8
8/19/16	Elder, Timothy	Read letter from GDU i.e.; outline elements of response	0.5		0.5	475	237.5	7
8/24/16	Elder, Timothy	Advise NFB on questions about how to interact with Uber on other partnerships during pendency of settlement	0.5		0.5	475	237.5	7
8/24/16	Elder, Timothy	Gather and review all time entries and expenses for each firm; discount any improper TRE Legal entries	3.7	No Charge	0	475	0	8
8/27/16	Elder, Timothy	Work on Elder declaration and memo ISO fee petition	3.2		3.2	475	1520	8

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8/27/16	Elder, Timothy	Review combined time records with Galvin sorting and no charges; review cases re multiplier; review Manson and Pearl draft declarations; send comments to J Marks for revisions	4.9		4.9	475	2327.5	8
8/28/16	Elder, Timothy	Continue drafting lengthy lead declaration for fees petition; compare with Bien sample declaration from other fee petition	2.7	No Charge	0	475	0	8
8/29/16	Elder, Timothy	Continue drafting lengthy lead declaration for fees petition; compare with Bien sample declaration from other fee petition; review comprehensive time records to narrate reasonableness of fees in phases of litigation	9.1		9.1	475	4322.5	8
8/30/16	Elder, Timothy	Carry on with drafting lengthy lead declaration for fees petition; compare with Bien sample declaration from other fee petition; review comprehensive time records to narrate reasonableness of fees in phases of litigation	9.6		9.6	475	4560	8
8/31/16	Elder, Timothy	Resume drafting declarations and brief on fee petition; discuss discrete issues by email with co-counsel; review multiplier case authority; research case law on fee petitions in Ninth Circuit	8.2		8.2	475	3895	8
9/2/16	Elder, Timothy	Edit declaration and insert tables of summary time entries	0.5		0.5	475	237.5	8
9/2/16	Elder, Timothy	Talk with JM and MN re Uber; discuss issues in fee motion with MN and MB	0.4		0.4	475	190	8
9/2/16	Elder, Timothy	Continue adding and editing main fee petition declaration; review and reference Bien declaration from another case	5.5		5.5	475	2612.5	8
9/3/16	Elder, Timothy	Continue adding and editing main fee petition declaration; review and reference Bien declaration from another case; review time entries; calculate time expended on phases	8.5		8.5	475	4037.5	8
9/4/16	Elder, Timothy	Continue adding and editing main fee petition declaration; review and reference Bien declaration from another case; review discovery serve history	9.4		9.4	475	4465	8
9/5/16	Elder, Timothy	Finish editing and writing fee declaration with 50 pages; work on final tables; recalculate errors in numbers	9.1	No Charge	0	475	0	8
9/6/16	Elder, Timothy	Talk with Uber re negotiating fee petition	0.2		0.2	475	95	8
9/6/16	Elder, Timothy	Review Peral and Mason declaration drafts; talk with J Marks re same	0.5		0.5	475	237.5	8
9/6/16	Elder, Timothy	Additional legal research and drafting of the fee brief	9.9		9.9	475	4702.5	8
9/7/16	Elder, Timothy	Work on memo statement of facts for fee petition; read cases on fee awards; double check numbers in fee petition	10.5		10.5	475	4987.5	8
9/8/16	Elder, Timothy	Read cases on lodestar for memo; edit memo; cite declarations; review draft Goldstein and Mason declarations; review other sample fee petitions; dig in on research threads for multiplier	10.3	No Charge	0	475	0	8