

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: American Honda Motor Co., Inc.,
CR-V Vibration Marketing and Sales
Practices Litigation

Case No. 2:15-md-2661

Judge Michael H. Watson
Chief Magistrate Judge Deavers

This document relates to: ALL CASES

**DECLARATION OF DAVID STEIN IN SUPPORT OF
MOTIONS FOR FINAL APPROVAL AND ATTORNEY'S FEES**

I, David Stein, declare as follows:

1. I am a partner at the law firm of Gibbs Law Group LLP. Along with my partner, Eric Gibbs, and our co-counsel at the Isaac Wiles law firm, I am one of the attorneys appointed Class Counsel in this action. I submit this declaration in support of Plaintiffs' motions for final settlement approval and for reimbursement of their attorney's fees and litigation expenses. I make this declaration based on my personal knowledge; if called upon to do so, I could and would testify competently to the information that follows.

2. To help the Court assess the reasonableness of my firm's lodestar, I provide a variety of information below, including (i) a general overview of our efforts during this litigation and settlement; (ii) a more detailed phase-by-phase breakdown of our efforts, and (iii) a lodestar calculation based on our current billing rates (along with further information in support of the reasonableness of our rates).

I. GENERAL OVERVIEW

3. Our efforts in this matter began in June 2015, when we first spoke with owners of new 2015 Honda CR-Vs who reported that their vehicles were vibrating, particularly at low speeds. They reported that the vibration was substantially worse than they expected from a new vehicle, that it bothered them and their passengers, and that they would not have purchased the vehicles had they known about the problem. The vibration typically began almost immediately after the vehicles were driven away from the dealership lots, and in addition to those who contacted us directly, many others complained in online forums and to the National Highway Traffic Safety Administration (NHTSA). Many had complained to Honda or to a Honda dealership, but were told in response that their vehicles were operating normally, that there was no problem, and that no repairs would be provided – let alone for free, under warranty.

4. We were first retained by a 2015 CR-V owner who lived in Southern California, named Linda Oakes, and we immediately began investigating on behalf of Ms. Oakes and other CR-V drivers. Our attorneys have considerable experience investigating consumer complaints about automobiles, and we used that experience here, including by delving into relevant automotive industry literature on the systems, components, and symptoms at issue in consultation with an automotive expert that we retained. We concluded that the complaints were sufficiently numerous and serious, and we sent Honda a pre-suit demand letter as required under California’s Consumers Legal Remedies Act and certain warranty statutes. Honda responded to our demand weeks later, declining to resolve Ms. Oakes’ grievance, saying there was “no defect” and that it was not willing to take remedial action.

5. Given Honda’s express unwillingness to make things right voluntarily, we filed suit on Ms. Oakes’ behalf on July 7, 2015, in the Central District of California (the district in

which Ms. Oakes lived and in which Honda is headquartered).¹ Our pre-suit investigation and research allowed us to plead a detailed complaint that alleged that (i) in the automotive industry, problems relating to noise, vibration, and harshness (commonly referred to as NVH), have long been connected with low engine speeds; (ii) the 2015 CR-V was designed with low engine speeds to boost fuel economy numbers; (iii) the CR-V also has a four-cylinder engine with an inline design and piston synchronization that increases vibration; (iv) the CR-V also has cylinders offset by 8.0 mm from the crankshaft—another factor in increased asymmetric vibrations; and (v) the CRV was not equipped with vibration dampening components such as hydraulic mounts. The Court later recognized that “the work [we] did in ... investigating potential claims in this action is evident” and noted that the complaint was “more thorough” than a competing complaint that was filed by another law firm. Docket No. 15 at 3.

6. After filing suit, we spent several months engaging in efforts to coordinate, centralize, and lead the various 2015 CR-V vibration class actions that had been filed around the country. Initially, when there were multiple cases pending in the Central District of California, we filed a notice alerting the courts to the fact that multiple cases arising from the same factual and legal issues were pending before different judges in the district. A few weeks later, as more cases were filed around the country, we initiated the multidistrict litigation process by filing a motion to centralize and transfer the related cases (which required filing an opening and response brief and also arguing the issue before the Judicial Panel on Multidistrict Litigation (JPML)).

Once the many cases were centralized before this Court, our attorneys took the lead in preparing

¹ Unfortunately, Ms. Oakes passed away after suit was filed, and after speaking with her next of kin, we filed a dismissal of her individual claim on February 16, 2016. Docket No. 27, Case No. 8:15-cv-01076 (C.D. Cal.). By that time, a number of additional CR-V owners had volunteered to serve as class representatives.

and finalizing the initial joint agenda submitted to the Court; we participated in two initial status conferences; and we prepared and filed the motion to serve as lead counsel on behalf of the proposed class, which the Court granted on December 18, 2015. Docket No. 15. During that time, we also continued our factual investigation with an eye toward amending the complaint.

7. In November 2015, after the JPML had centralized the cases before this Court, Honda released a repair bulletin (known in the industry as a Technical Service Bulletin). The bulletin instructed Honda dealerships about which repairs to perform for the vibration. By waiting to release the bulletin in November, Honda had already sold the vast majority of its 2015 CR-V models by that time, and numerous drivers had already complained about the vibration and been turned away without receiving repairs. Nevertheless, when it released the bulletin, Honda did not undertake significant effort to publicize the availability of the new repairs; it did not contact the drivers who had complained and made no real effort to communicate the availability of the repairs to those told that nothing could be done to improve their vehicle's performance. Also, the warranty coverage for the repairs remained poorly understood, since the repair bulletin said only that the "normal warranty applies" — an ambiguous statement since Honda issues multiple warranties with its vehicles and drivers had been repeatedly told that no warranty repairs were available.

8. So, during the months that followed, we focused largely on obtaining information to gauge whether the new repairs were effective and, if so, what more could be done to benefit class members. *See, e.g.*, Docket No. 12 at 2 (seeking appointment as lead counsel so that our attorneys "would be empowered to ... verify the issue's root cause, evaluate the new repair procedures, and assess the impact on consumers' legal rights"). We reviewed documents and information that Honda produced in discovery, we continued our independent investigation, we

continued to work with our automotive consultant to understand the information we received and to formulate additional requests, and we spoke with many dozens of class members who could tell us firsthand what they were experiencing, whether they were aware of the repairs, whether the repairs were working for their vehicles, and whether they had difficulties obtaining the repairs. Through this process we concluded that for most drivers, the repairs that Honda promulgated in November 2015 were effective if implemented. But many drivers did not know the repairs were available, and dealerships continued to provide mixed messages. Some dealerships appeared to be unaware that the repairs existed and that they could be provided under free under warranty. Getting proper notice to vehicle owners about the availability of the repairs became a major priority.

9. At the same time, Honda continued to mount a strenuous defense. After we prepared and filed a consolidated amended complaint (and later a second amended complaint) on behalf of 16 class representatives from 14 states, Honda filed a motion to dismiss under Rules 12(b)(1) and 12(b)(6). The motion raised issues of constitutional ripeness and standing, the injury requirements under various state consumer protection statutes, and other state law issues involving fraud by omission claims and California's "secret warranty" statute. We prepared a thorough opposition, which responded to the legal arguments and reiterated that "[o]ne of the major purposes of this lawsuit is to ensure that Honda notifies all CR-V drivers that repairs are available" — something that Honda was still refusing to do. Docket No. 46 at 1.

10. In addition to its motion to dismiss, Honda served 272 discovery requests on three class representatives, which required considerable time and coordination to respond to, and we reviewed and produced over one thousand pages of documents in response. Next, Honda demanded vehicle inspections of several class representatives' vehicles, which required

negotiating an inspection protocol, retaining and educating an expert to attend the inspections, and traveling to the inspections to oversee them. Honda also filed a separate motion seeking to compel arbitration of several plaintiffs' claims; this too required an opposition dealing with a variety of complex legal issues as well as factual issues surrounding the vehicle purchases and the governing contracts.

11. In August 2016, after engaging in those time-intensive efforts, the parties engaged in an in-person conference to explore whether it would be productive to hold formal settlement discussions with the help of a mediator. As a result of that meeting, our subsequent telephone discussions with Honda's counsel, and the exchange of a formal demand letter and response, the parties concluded that a mediation was likely to be productive. In the ensuing months before the mediation, we continued with discovery — focusing in particular on obtaining the documents and information that would help us prepare for the mediation. We also continued to speak with many of the hundreds of class members who have contacted us during the litigation, since they provided invaluable insight into how their vehicles were performing, the difficulties in obtaining repairs, the efficacy of the repairs, and what would be of value to them in a settlement. Following those efforts, we conducted the two-day mediation in March 2017 with the professional mediator, Frank A. Ray. On the second day of the mediation, we reached an agreement in principle to resolve the litigation, centered upon a robust notice campaign to ensure that 2015 CR-V drivers around the country knew they could obtain free repairs if their vehicles were vibrating. Honda also agreed to notify drivers that it would be covering the repairs under two extended warranties, which last far longer than Honda's limited new vehicle warranty. For the limited number of drivers who continue to experience unpleasant vibration after obtaining the

repairs, the settlement leaves them with their full legal rights to seek remuneration, whether through the free ADR process available to them or some other mechanism.

12. Although we had reached an agreement in principle to resolve the litigation, substantial work remained to finalize the settlement. Mr. Gibbs and I held a number of telephone calls with Honda's counsel to negotiate various details of the settlement. And it took months to finalize the settlement agreement and exhibits (which together span over 100 pages). We also held a third day of mediation in an unsuccessful attempt to resolve Plaintiffs' claim for reimbursement of attorney's fees and litigation expenses.

13. Once the settlement was finalized we prepared the motion and supporting papers seeking preliminary settlement approval, final settlement approval, and attorney's fees and costs. We have also worked with Honda's attorneys on a range of issues relating to the dissemination of settlement notice and communicating with our clients and absent class members about the settlement. Based on my experience in past cases, our lawyers are likely to continue to engage in efforts on behalf of the class throughout the pendency of the customer outreach program.

II. SUMMARIES OF OUR EFFORTS – DELINEATED BY LITIGATION PHASE

14. To assist the Court in evaluating the reasonableness of the time we devoted to this case on behalf of the class, I have broken the litigation into 5 phases, as shown in the table below. In the sections that follow, I summarize the primary tasks to which we devoted our time during each phase, along with the contributions made by the attorneys and paralegal who worked on the case. To present our time in a manner that I believe is most helpful to the Court, the following phases are generally (but not strictly) chronologically distinct.

	Description	Phase	Hours	Lodestar
A.	Investigation and complaint, JPML, early litigation	June 2015 – December 2015	233.6	\$118,127
B.	Consolidated complaint, motion to dismiss, early discovery	December 2015 – May 2016	440.6	\$231,816
C.	Arbitration, further discovery, early settlement efforts	June 2016 – March 2017	590.6	\$313,676
D.	Settlement agreement and motions	March 2017 – Present	321.8	\$191,462
E.	Communicating with class members	Throughout	213.0	\$80,347
	Total Time		1,799.6	\$935,426

A. Investigation and complaint, JPML, early litigation (June 2015 – December 2015)

15. This initial phase encompasses our initial investigation and research and the complaint that we filed in the Central District of California; our efforts related to coordinating the competing class actions filed across the country; and the first work in this Court after the JPML centralized the cases. During this phase of the litigation, we engaged in a variety of efforts.² Among other things, we:

- Interviewed and developed factual allegations on behalf of several potential class representatives
- Investigated various public sources of information, including online driver complaints on internet forums and with the National Highway Traffic Safety Administration (NHTSA)

² Although my primary focus in this declaration is to provide the Court with information about my firm's work in this case, I should note that in a number of instances, we were working cooperatively with liaison counsel at the Isaac Wiles firm or other lawyers who helped represent plaintiffs in this litigation. By recounting our efforts, I do not mean to imply that our firm can take exclusive credit for all of this work.

- Prepared and sent FOIA and open records requests to both the NHTSA and California Air Resources Board
- Conducted a technical investigation into the causes of the vibration, including by reviewing technical literature and working with an automotive consultant
- Prepared and sent a demand letter to Honda and assessed Honda's response (which denied the existence of a defect and declined to offer any relief)
- Researched and prepared the initial class action complaint and associated documents (including a venue declaration required by California law and a notice of interested parties required by local rule of court)
- Engaged in preliminary activity to coordinate the cases, including entering into a stipulation to extend time with Honda and filing a notice of related case
- Prepared a motion and supporting papers to centralize all of the related class actions through MDL proceedings
- Conducted extensive research into the location of Honda's manufacturing, design, and other CR-V related efforts (since the locations of those activities was a key area of dispute in the centralization briefing and oral argument)
- Reviewed the MDL response briefs and prepared a reply brief in further support of centralization
- Conducted oral argument on the issue of centralization in New York, New York, before the JPML
- Continued to interview class members who wished to share information about their vehicles or who sought to serve as class representatives in the amended complaint
- Drafted the joint agenda (and coordinated with other plaintiffs' attorneys and with Honda to finalize the agenda) before the initial status conference
- Participated in the initial status conference with the Court
- Prepared our application to serve as lead counsel on behalf of the class, including the supporting brief and declaration
- Reviewed Honda's new technical service bulletin (which provided dealerships with new repairs to address the vibration), conferred with our automotive consultant and with Honda about the bulletin's implications, and conducted independent research regarding its efficacy

- Participated in a second status conference with the Court
- Following the Court's order appointing lead and liaison counsel, we began the early stages of preparing a substantially broader consolidated amended complaint

16. The table below lists the hours contributed to the case by each of the attorneys who worked on the case during this phase. I took the lead in developing our initial complaint, and I was also heavily involved with both the JPML process and then the early efforts to help coordinate and lead this litigation once the cases were centralized before this Court. Mr. Lopez, an associate working at my direction, helped with our investigation and research and with drafting the demand letter and portions of the complaint. He also helped prepare the reply brief to the JPML in support of centralization, researched the location of various Honda activities, and spoke with potential class representatives. Ms. Corbitt, also an associate, prepared the initial drafts of the leadership brief and the supporting declaration, and also assisted in the investigation into Honda's repair bulletin. Mr. Howarter, a third associate, helped field calls from class members and potential class representatives, prepared evidence preservation letters, drafted the open records requests, and later assisted in preparing the opening motion to centralize (and the various supporting papers). My partner Dylan Hughes assisted in developing our technical understanding of the case, working with our automotive consultant to ensure the accuracy of our allegations in the complaint and then later assessing the likely efficacy of Honda's repair bulletin. Finally, Mr. Gibbs reviewed and edited the complaint, reviewed and edited each of the MDL briefs, participated in the status conferences, assisted with the leadership application, and conferred with defense counsel about the litigation and repair bulletin.

Name	Title	Bar Date	Hours
David Stein	Partner	2008	100.2
Dylan Hughes	Partner	2000	12.2
Eric H. Gibbs	Partner	1995	6.4
Steve Lopez	Associate	2014	54.4
Caroline Corbitt	Associate	2015	35.4
Shane Howarter	Associate	2016	25.0
Total			233.6

B. Consolidated complaint, motion to dismiss, early discovery (December 2015 – May 2016)

17. The phase following the Court’s appointment of lead counsel and liaison counsel was among the busiest in the case, featuring extensive work on pleadings, Honda’s motion to dismiss, and discovery. During this phase, among other things, we:

- Negotiated a tolling agreement and stipulation of dismissal for the claims against Honda’s Japanese parent company
- Developed and implemented a time keeping and expense protocol for all Plaintiffs’ counsel
- Continued our factual investigation with the support of our automotive consultants
- Interviewed about 60 absent class members to learn about their experiences and to add class representatives from additional states in the amended complaint
- Conducted legal research to ensure proper pleading of various causes of action under over a dozen states’ laws
- Prepared the amended consolidated complaint and then the second amended consolidated complaint (which consolidated the claims of several of the original plaintiffs and added numerous state law claims on behalf of additional class representatives)
- At Honda’s request, coordinated with various counsel for the dismissal of the claims of Plaintiffs not named as class representatives in the consolidated complaints

- Prepared additional demand letters on behalf of the new class representatives to comply with consumer protection and warranty statutes
- Researched and opposed Honda's motion to dismiss (which raised issues of constitutional ripeness and standing as well as a number of issues under different state laws)
- Met and conferred with Honda as part of the Rule 26 process to discuss a discovery plan and case schedule, and then prepared the case management statement
- Engaged in protracted negotiations with Honda to finalize a protocol to govern electronic discovery
- Negotiated a protective order with Honda to govern the production of confidential materials during discovery
- Prepared and served Plaintiffs' initial disclosures and reviewed Honda's disclosures
- Worked with the class representatives to search for and produce documents in conjunction with the initial disclosures
- Prepared and served written discovery requests on Honda; met and conferred with Honda about its responses; and reviewed the original and supplemental responses
- Reviewed documents produced by Honda and worked with our consultant to understand the technical aspects of the documents;
- Drafted joint agendas in advance of each of the monthly status hearings and participated in the hearings.

18. The table below lists the hours contributed to the case by each of the attorneys who worked on the case during this phase. I took the lead from our firm negotiating and preparing the various joint documents (including the ESI protocol, tolling agreement, and joint agendas for status conferences); led the efforts in conducting Plaintiffs' offensive discovery; and was primarily responsible for the two consolidated amended complaints, among other things. Ms. Corbitt provided the primary associate support and spent many hours interviewing dozens of potential class representatives in the context of preparing the amended complaints. Mr. Lopez

helped briefly with the class representative interviews and discovery-related tasks. Mr. Stockton, an associate, was primarily engaged to research and prepare the opposition to Honda's motion to dismiss. My partner Geoffrey Munroe assisted with that briefing as well as pleading and discovery strategy, while Mr. Hughes continued to assist in reviewing the more technical documents and working with our automotive consultants. Mr. Gibbs coordinated with defense counsel and other Plaintiffs' counsel during this phase and helped with high level strategy in discovery and motion practice.

Name	Title	Bar Date	Hours
David Stein	Partner	2008	245.7
Geoffrey A. Munroe	Partner	2003	12.2
Dylan Hughes	Partner	2000	9.8
Eric H. Gibbs	Partner	1995	7.0
Caroline Corbitt	Associate	2015	104.2
Clay Stockton	Associate	2012	58.1
Steve Lopez	Associate	2014	3.6
Total			440.6

C. Arbitration, further discovery, early settlement efforts (June 2016 - March 2017)

19. During this next phase, we continued to engage in offensive discovery, responded to Honda's voluminous discovery requests, and negotiated and conducted vehicle inspections at Honda's insistence. We also opposed Honda's motion to compel arbitration. And we spent considerable time developing our settlement position and working with Honda to resolve this litigation, including during a two-day mediation in March 2017. Among other things, during this phase we:

- Worked with three class representatives to respond to 272 written discovery requests from Honda and to produce about 1,000 pages of responsive documents

- Coordinated three class representatives' vehicle inspections at Honda's request; engaged in negotiations with Honda for a protocol to govern the inspections; and attended the three inspections (in Virginia, Ohio, and Massachusetts)
- Negotiated the scope of additional document productions by Honda
- Prepared and served a Rule 30(b)(6) deposition notice on Honda and met and conferred with Honda's counsel about the notice
- Engaged in written meet and confer with Honda on a range of discovery topics
- Assisted in opposing Honda's motion to compel arbitration (in conjunction with Public Justice³)
- Continued efforts related to identifying and retaining an appropriate liability expert
- Drafted status reports and joint agendas in advance of each of the monthly status hearings and participated in the hearings
- Conferred with Honda about the scope of the litigation and the prospects for preliminary discussions about resolution
- Prepared for and conducted an in-person settlement conference with Honda in Los Angeles
- Coordinated with counsel representing a Plaintiff in a post-centralization tag-along action
- Worked with our automotive consultant, continued our fact investigation, and reviewed Honda documents, to identify additional information needed before mediation
- Worked with class representatives and class members to develop priorities and position for mediation

³ Public Justice is a public interest advocate with a team of attorneys dedicated to preserving access to courts for ordinary people. They have considerable expertise and experience opposing motions to compel arbitration, so we decided that it would be in class members' best interest to retain Public Justice to assist in opposing Honda's motion to compel arbitration. Our lawyers assisted in the factual aspects of the opposition, communicated with Public Justice attorneys throughout the process, and reviewed and revised the brief before filing it.

- Met and conferred with Honda regarding the litigation and discovery ramification of a class representative's sale of class vehicle
- Prepared a formal settlement demand to Honda before mediation and evaluated Honda's response
- Continued to meet and confer with Honda in advance of mediation regarding parameters of a settlement
- Conducted numerous interviews with absent class members and created an interview video for use at mediation to provide mediator with firsthand exposure to driver complaints about the vibration
- Prepared a mediation statement and evaluated Honda's statement
- Conducted a two-day mediation with Honda, at which the overarching structure of the settlement was reached

20. The table below lists the hours contributed to the case by each of the attorneys who worked on the case during this phase. I continued to help lead our offensive discovery efforts, oversaw the opposition to Honda's motion to compel arbitration, negotiated the protocol for Honda's inspection of the class representatives' vehicles, assisted with the defensive discovery responses, attended the monthly status hearings, and assisted with the settlement efforts, including Plaintiffs' formal demand and mediation statement. My partner Amy Zeman participated in the settlement negotiations; oversaw our continued investigation, research, and other efforts to prepare for those negotiations; and worked with Honda on a range of discovery issues. Ms. Corbitt again provided the primary associate support during this phase; among other things, she was heavily involved in preparing Plaintiffs' discovery responses and the collection and review of documents produced to Honda. She also attended the vehicle inspections and interviewed several dozen class members during this phase (and created a video with driver interviews) to help bolster our position at mediation. A.J. De Bartolomeo provided partner supervision and collaboration in responding to Honda's extensive discovery requests and

producing responsive documents. Mr. Hughes helped focus our discovery efforts based on his knowledge of the technical issues and consultation with our experts, and Mr. Lopez also assisted with discovery and inspection tasks. Finally, Mr. Gibbs led our efforts to devise a settlement strategy and to conduct settlement negotiations at the in-person settlement conference in Los Angeles, during the two-day mediation in Columbus, and by telephone.

Name	Title	Bar Date	Hours
David Stein	Partner	2008	107.0
Eric H. Gibbs	Partner	1995	75.7
A.J. De Bartolomeo	Partner ⁴	1988	30.3
Dylan Hughes	Partner	2000	6.9
Clay Stockton	Associate	2012	1.3
Amy Zeman	Partner	2010	135.5
Caroline Corbitt	Associate	2015	225.2
Steve Lopez	Associate	2014	8.7
Total			590.6

D. Settlement agreement and motions (March 2017 – Present)

21. Once the parties reached a settlement in principle, considerable work remained to memorialize the settlement in a comprehensive written agreement. The settlement agreement has ten exhibits, including the customer outreach notices and proposed orders. During this phase, in addition to continuing to negotiate and finalize the settlement documents, we also prepared the motions for preliminary settlement approval, final settlement approval, and attorney's fees and costs. In conjunction with those efforts, we conducted an additional mediation with Honda in an unsuccessful attempt to resolve the fee motion. Thus, during this phase we engaged in efforts including:

⁴ Ms. De Bartolomeo was a partner at our firm throughout the time that she worked on this case and is now of counsel to the firm.

- Prolonged efforts in connection with negotiating and preparing the settlement agreement, including a series of follow-up telephone negotiations with Honda's counsel
- Legal research into various issues related to the settlement, including Rule 23(b)(2) settlement requirements, class notice, the timing of various filings and class member objections, and the contours of the injunction
- Communicating the settlement to other Plaintiffs' counsel, the various class representatives, and absent class members
- Preparing status reports to keep the Court apprised of our efforts and participated in telephonic status hearings
- Drafting the notices that serve as exhibits to the settlement agreement as well as both proposed orders (the proposed preliminary approval order and the proposed injunctive relief order)
- Working through Honda's edits to the various exhibits to the settlement agreement and negotiating and finalizing the exhibits
- Preparing for and engaging in a mediation with Honda to try to resolve motion for attorney fees and costs
- Working with Honda's counsel to implement the settlement's customer outreach program, including negotiating placement of notice on Owner Link website and the protocol for web optimization, reviewing and proposing changes to the settlement website, and working through various other issues relating to the notice program
- Preparing the preliminary and final approval motions, with supporting documents, as well as this application for reimbursement of attorney fees and litigation expenses (including this declaration)

22. The table below lists the hours contributed of each of the attorneys who worked on the case during this phase. I took primary responsibility for Plaintiffs in drafting and revising various settlement documents (including the settlement agreement and exhibits). Ms. Corbitt assisted in fact-checking and other associate-level work relating to the settlement agreement, exhibits, and approval papers and conducted many discussions with the class representatives on issues relating to the settlement; she also performed first drafts of several of the settlement

documents. Mr. Munroe took the lead in preparing the preliminary settlement approval papers and fee application. Mr. Lopez assisted in the preparation of this final approval motion. And Mr. Gibbs led our efforts to finalize the settlement through negotiations with Honda and also reviewed and revised the agreement, briefs, and other documents.

Name	Title	Bar Date	Hours
David Stein	Partner	2008	119.9
Geoffrey A. Munroe	Partner	2003	72.1
Eric H. Gibbs	Partner	1995	51.5
Amy Zeman	Partner	2010	4.4
Caroline Corbitt	Associate	2015	64.2
Steve Lopez	Associate	2014	9.7
Total			321.8

E. Communicating with class members (throughout the litigation)

23. During the multi-year pendency of this litigation, we have been contacted by approximately 600 class members. To some degree our efforts in communicating with them is reflected in the preceding phases (including interviewing class members in connection with the amended complaints and in preparation for mediation). But class members also contacted us at their convenience throughout the litigation to ask for status updates, advice about seeking repairs, and the like. Engaging in these communications not only helped keep class members informed, but also frequently proved useful as we gauged the extent of drivers' concern about the complaints, their familiarity with Honda's repairs, and the efficacy of those repairs. As part of our efforts in this regard, we posted a webpage to provide absent class members with information about the case, the vibration, and the repairs; we sent out periodic email updates; and we answered and responded to hundreds of class members' phone calls and emails. As the table below reflects, this labor was undertaken to a small degree by me personally (and I also

supervised our firm's efforts) but was undertaken to a larger degree by Ms. Corbitt and the paralegal and other associates on the case.

Name	Title	Bar Date	Hours
Eric H. Gibbs	Partner	1995	0.4
David Stein	Partner	2008	35.1
Steve Lopez	Associate	2014	5.3
Dylan Hughes	Partner	2000	5.2
Caroline Corbitt	Associate	2015	115.7
Shane Howarter	Associate	2016	7.0
Jason Gibbs	Paralegal	n/a	44.3
Total			213.0

24. Pursuant to the parties' settlement agreement and the Court's preliminary approval order, the customer outreach program began on or around June 23, 2018. Consistent with our obligations, Class Counsel disseminated an email notice to approximately 417 class members who had contacted us about vibration in their 2015 CR-Vs. Based on experience resolving similar cases involving vehicles in the past, I expect that we will continue to hear from class members for months or years to come and that we will spend dozens more hours communicating with them about the case, the settlement, and their rights and options. In addition, we will continue to work with Honda to ensure the customer outreach program is implemented consistent with the settlement agreement and this Court's orders.

25. I continue to believe that the proposed settlement is in the best interests of the class. In my experience litigating similar cases, I believe the settlement is fair, reasonable, and adequate, and merits approval by this Court.

III. HOURLY RATES AND LODESTAR CALCULATION

26. In the course of investigating, litigating, and resolving this litigation, Gibbs Law Group attorneys have devoted a total of 1,799.6 hours to this litigation, with a total lodestar of

\$935,426 and an overall blended rate (lodestar divided by total hours) of \$520. A true and correct copy of our time records is attached as **Exhibit A**.

27. I have personally reviewed my firm's time records, which have been maintained contemporaneously since we began working on this matter. The totals I report in this declaration are actually far below our total time invested in this litigation, because I have gone through our records in detail and exercised billing discretion to subtract over 10% of the hours we devoted to this case. I can thus confidently assert that the lodestar and hours reported in this declaration are reasonable and conservative accounting, with the distribution set forth in the below table:

Name	Title	Bar Date	Hours	Rate	Lodestar
David Stein	Partner	2008	607.9	\$605	\$367,780
Eric H. Gibbs	Partner	1995	141.0	\$805	\$113,505
Amy Zeman	Partner	2010	139.9	\$550	\$76,945
Geoffrey A. Munroe	Partner	2003	84.3	\$660	\$55,638
Dylan Hughes	Partner	2000	34.1	\$685	\$23,359
A.J. De Bartolomeo	Partner	1988	30.3	\$740	\$22,422
Caroline Corbitt	Associate	2015	544.7	\$365	\$198,816
Steve Lopez	Associate	2014	81.7	\$415	\$33,906
Clay Stockton	Associate	2012	59.4	\$400	\$23,760
Shane Howarter	Associate	2016	32.0	\$340	\$10,880
Jason Gibbs	Paralegal	n/a	44.3	\$190	\$8,417
Total			1799.6		\$935,426

28. We set our billing rates to be comparable to non-contingency billing rates charged by other attorneys performing work in complex litigation, including the rates published in surveys conducted by the National Law Journal. Based on my years of experience in consumer class actions and complex litigation, I believe these billing rates are commensurate with the rates charged by other firms with similar experience and expertise. In connection with fee applications like this one, my firm's billing rates have been regularly evaluated and approved by courts in

recent years. *See, e.g., Beaver v. Tarsadia Hotels*, No. 11-cv-01842, ECF No. 314 (S.D. Cal. Sept. 28, 2017); *Mendoza v. Hyundai Motor Co.*, No. 15-cv-01685, ECF No. 85 (N.D. Cal. Jan. 23, 2017); *Yaeger v. Subaru of Am.*, No. 14-cv-4490, ECF No. 109 (D.N.J. Aug. 31, 2016); *Velasco v. Chrysler Group, LLC*, No. 2:13-cv-08080, ECF No. 167 (C.D. Cal. Jan. 27, 2016); *In re Peregrine Fin. Grp. Customer Litig.*, No. 12-cv-5546, ECF No. 441 (N.D. Ill. Oct. 15, 2015); *In re Adobe Systems Inc. Privacy Litig.*, No. 5:13-cv-05226, ECF No. 107 (N.D. Cal. Aug. 13, 2015); *Khaliki v. Helzberg's Diamond Shops*, No. 11-cv-0010, ECF No. 57 (W.D. Mo. Mar. 9, 2012); *In re Mercedes-Benz Tele Aid Contract Litig.*, No. 07-md-2720, ECF No. 196-4 (D.N.J. July 7, 2011). Additional information about Gibbs Law Group can be found in the firm's resume, attached as **Exhibit B**.

IV. SUMMARY OF EXPENSES

29. Gibbs Law Group has incurred \$49,695.57 in litigation expenses to prosecute this case, as reflected in the following table:

Cost Category	Amount
Airfare	\$6,262.46
Copying	\$545.10
Couriers	\$1,223.13
Experts/Consultants	\$18,963.90
Filing Fees	\$400
Ground Transportation	\$1,308.71
Lodging	\$4,435.93
Meals	\$999.43
Mediation	\$4,794.83
Parking	\$85.00
Postage & Delivery	\$1,676.11
Research	\$9,000.97
Total	\$49,695.57

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 10, 2018, in Oakland, California

/s/ David Stein
David Stein

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2018, a copy of the foregoing was filed electronically.

Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

Parties may access this filing through the Court's system.

/s/ David Stein
David Stein (*pro hac vice*)
Class Counsel

EXHIBIT A

<u>Date</u>	<u>First Name</u>	<u>Last Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Lodestar</u>
6/2/2015	Dave	Stein	review driver complaints and videos re potential case; confer with D Hughes, S Lopez re same; review client's facts and strategize re demand letter and other steps	1.8	\$605.00	\$1,089.00
6/2/2015	Steve	Lopez	Confer with D Stein re potential case and phone call with potential client	0.3	\$415.00	\$124.50
6/3/2015	Dave	Stein	Review and revise prefilng demand letter	0.4	\$605.00	\$242.00
6/3/2015	Steve	Lopez	Research and draft demand letter	1.9	\$415.00	\$788.50
6/4/2015	Dave	Stein	Confer with S Lopez re finalizing demand letter, updating client	0.2	\$605.00	\$121.00
6/4/2015	Steve	Lopez	Confer with D Stein re demand letter; finalize and update client	0.1	\$415.00	\$41.50
6/22/2015	Dave	Stein	Review CLRA letter response from Honda; strategize re additional information to research before drafting complaint	0.3	\$605.00	\$181.50
6/25/2015	Dave	Stein	Review driver complaints and continue to strategize re potential case; confer briefly with S Lopez re same	0.6	\$605.00	\$363.00
6/25/2015	Steve	Lopez	Confer with D Stein re research and expert needs; research online forum posts and consumer complaints	1.8	\$415.00	\$747.00
6/25/2015	Steve	Lopez	Email automotive consultant re technical issues	0.3	\$415.00	\$124.50
6/29/2015	Dave	Stein	Continue to review underlying information to assess and strategize re potential case, including online complaints and youtube videos; share findings with team	0.7	\$605.00	\$423.50
6/29/2015	Dylan	Hughes	technical research re vibration issues, including research re engine mounts, new engine design, and cvt transmission. Research re CRV advertisments. Prepare for and attend call with automotive consultant. Discuss pleading strategy with team. Research re Honda warranty.	3.4	\$685.00	\$2,329.00
7/1/2015	Dave	Stein	Continue review of underlying documents including tech line summary and other background materials re engine, transmission; review and revision of draft complaint; confer with S Lopez re same	7.6	\$605.00	\$4,598.00
7/1/2015	Steve	Lopez	Draft factual section of complaint, focusing on Honda's design of the Earth Dreams engine, CVT transmission, and vibration issue, including studies showing the effect of NVH on drivers; online research concerning same	5.9	\$415.00	\$2,448.50
7/2/2015	Dave	Stein	review various technical articles and other such documents to further understanding of vehicles, defect	2.7	\$605.00	\$1,633.50
7/5/2015	Dylan	Hughes	review SAE article re NVH and vibration concerns with fuel economy and low idle.	2.9	\$685.00	\$1,986.50
7/6/2015	Dave	Stein	continue drafting/revising complaint; thorough review of various technical articles to add detail about noise, vibration, harshness factors	8.3	\$605.00	\$5,021.50

7/6/2015	Eric	Gibbs	review and provide suggested revisions to draft complaint	0.8	\$805.00	\$644.00
7/7/2015	Dave	Stein	Continue review of technical articles, driver complaints to ensure proper level of depth and accuracy in complaint; final review and revision of complaint for sharing with automotive consultant; confer with team re same; review and revise class allegations, legal counts	4.3	\$605.00	\$2,601.50
7/7/2015	Dylan	Hughes	Final review of technical allegations and editing of complaint, review sac articles	2.6	\$685.00	\$1,781.00
7/7/2015	Steve	Lopez	Assist in review and revision of complaint	4.9	\$415.00	\$2,033.50
7/7/2015	Steve	Lopez	Locate and review online driver complaints for inclusion in complaint	0.9	\$415.00	\$373.50
7/7/2015	Steve	Lopez	Implement several further changes to complaint	0.7	\$415.00	\$290.50
7/7/2015	Steve	Lopez	Call client, review facts with her, confirm her approval of filing, and explain upcoming steps after the filing of complaint	0.6	\$415.00	\$249.00
7/7/2015	Steve	Lopez	Research/strategize about express warranty claims and eliminate from complaint for inclusion in later amended complaint	0.3	\$415.00	\$124.50
7/7/2015	Steve	Lopez	Research additional marketing materials for inclusion in complaint	0.7	\$415.00	\$290.50
7/7/2015	Steve	Lopez	Send complaint to consultant	0.1	\$415.00	\$41.50
7/7/2015	Steve	Lopez	Fact-check technical claims in complaint	0.6	\$415.00	\$249.00
7/7/2015	Steve	Lopez	Draft associated documents, including CLRA declaration, civil cover sheet, proposed summons, and notice of interested parties.	0.7	\$415.00	\$290.50
7/7/2015	Steve	Lopez	Proofread complaint and associated documents	0.6	\$415.00	\$249.00
7/8/2015	Dave	Stein	Review minute entries including court assignment; confer with S Lopez re notice of related case	0.2	\$605.00	\$121.00
7/8/2015	Steve	Lopez	Research 9th Circuit law on service of Japanese defendant	0.4	\$415.00	\$166.00
7/8/2015	Steve	Lopez	Confer with D Stein and prepare Notice of Related case	0.7	\$415.00	\$290.50
7/9/2015	Shane	Howarter	Prepare absent class member information page to help gather information about case and assess driver interest	2.3	\$340.00	\$782.00
7/10/2015	Dave	Stein	Strategize re organization of related cases, next steps	0.4	\$605.00	\$242.00
7/10/2015	Steve	Lopez	Review dockets of related cases and summarize status of each case for the team	0.7	\$415.00	\$290.50
7/13/2015	Dave	Stein	Review and revise web page for consumer outreach	0.2	\$605.00	\$121.00
7/16/2015	Shane	Howarter	Draft preservation letters to clients	1.3	\$340.00	\$442.00
7/17/2015	Dave	Stein	review activity in related cases and strategize re possible mdl filing; supervise S Howarter on preparing mdl papers	0.9	\$605.00	\$544.50
7/17/2015	Shane	Howarter	Research initiation of MDL proceedings with JPML, notices to file in other cases	1.4	\$340.00	\$476.00
7/17/2015	Shane	Howarter	Draft MDL motion	2.3	\$340.00	\$782.00
7/19/2015	Dave	Stein	review class member contacts and strategize re viable state law claims	0.3	\$605.00	\$181.50

7/19/2015	Dave	Stein	review and revise MDL brief	2.1	\$605.00	\$1,270.50
7/19/2015	Shane	Howarter	Continue drafting MDL brief	1.7	\$340.00	\$578.00
7/20/2015	Dave	Stein	review E Gibbs edits to MDL brief; final revisions to same; oversee finalization, preparation of related papers	0.8	\$605.00	\$484.00
7/20/2015	Eric	Gibbs	review and edit MDL papers	0.4	\$805.00	\$322.00
7/20/2015	Shane	Howarter	Draft MDL motion and Schedule of Actions	1.8	\$340.00	\$612.00
7/20/2015	Shane	Howarter	Further revisions to MDL brief; assemble exhibits for motion	0.8	\$340.00	\$272.00
7/20/2015	Steve	Lopez	Prepare questions for absent class members callers	0.3	\$415.00	\$124.50
7/21/2015	Dave	Stein	oversee preparation of notice of mdl initiation	0.2	\$605.00	\$121.00
7/21/2015	Dave	Stein	review contacts from new class members and strategize re additional state claims	0.3	\$605.00	\$181.50
7/21/2015	Shane	Howarter	Organize documents for service to various district courts, attorneys, and defendants	0.3	\$340.00	\$102.00
7/21/2015	Shane	Howarter	Draft notice of petition to JPML	0.9	\$340.00	\$306.00
7/21/2015	Shane	Howarter	Research local rules in districts of related cases re: filing notice of MDL motion	0.5	\$340.00	\$170.00
7/22/2015	Dave	Stein	review facts of new class member contact and strategize re potential claims; confer with S Lopez re evidence preservation obligations	0.3	\$605.00	\$181.50
7/22/2015	Shane	Howarter	Call class members to learn about case and answer questions about process	1.7	\$340.00	\$578.00
7/22/2015	Steve	Lopez	Review Romaya docket and filed stipulation	0.2	\$415.00	\$83.00
7/22/2015	Steve	Lopez	Collect and forward CR-V callers to S. Howarter and discuss intake strategy and criteria	0.4	\$415.00	\$166.00
7/23/2015	Dave	Stein	review synopsis of potential Texas client facts; strategize re potential state law claims and next steps	0.3	\$605.00	\$181.50
7/23/2015	Shane	Howarter	Calls with potential clients; confer with S. Lopez re: same	1.1	\$340.00	\$374.00
7/23/2015	Steve	Lopez	Circulate details of client intake to team	0.3	\$415.00	\$124.50
7/24/2015	Shane	Howarter	Calls with class members; confer with D. Stein re: same	0.8	\$340.00	\$272.00
7/27/2015	Dave	Stein	review writeups on various potential class representatives; strategize re potential state claims; prepare for and make calls to several potential class representatives	1.1	\$605.00	\$665.50
7/27/2015	Shane	Howarter	Call potential class reps with D. Stein; draft and send retention agreements	3.2	\$340.00	\$1,088.00
7/28/2015	Dave	Stein	oversee consumer outreach efforts	0.2	\$605.00	\$121.00
7/28/2015	Jason	Gibbs	Posting on Honda forums re case	0.6	\$190.00	\$114.00
7/29/2015	Dave	Stein	review filing in related action to stay abreast of litigation	0.1	\$605.00	\$60.50

7/29/2015	Dave	Stein	class member outreach; emails to class member contacts; phone calls with potential class representatives; confer with team re same	3.1	\$605.00	\$1,875.50
7/29/2015	Jason	Gibbs	calls with potential clients, update firm data base	0.5	\$190.00	\$95.00
7/29/2015	Shane	Howarter	Call class members with D. Stein; send rep agreements	1.5	\$340.00	\$510.00
7/29/2015	Shane	Howarter	Draft freedom of information act request for California Air Resources Board	1.4	\$340.00	\$476.00
7/29/2015	Steve	Lopez	Email team regarding pending response deadline in case	0.2	\$415.00	\$83.00
7/29/2015	Steve	Lopez	Review CRV forum posts and forum responses	0.3	\$415.00	\$124.50
7/30/2015	Dave	Stein	call from, to JPML re courtesy copies	0.2	\$605.00	\$121.00
7/30/2015	Dave	Stein	emails, calls with potential class representatives re retention agreement, next steps	3.3	\$605.00	\$1,996.50
7/30/2015	Shane	Howarter	Calls with clients; send out rep agreements	1.3	\$340.00	\$442.00
7/30/2015	Shane	Howarter	Update information webpage for absent class members about case	1.4	\$340.00	\$476.00
7/30/2015	Steve	Lopez	Review intakes and calls of potential class members	0.3	\$415.00	\$124.50
7/31/2015	Dave	Stein	review new class member contact and strategize re state claims; confer with S Lopez re same	0.3	\$605.00	\$181.50
7/31/2015	Shane	Howarter	Draft CARB and NHTSA public records requests	2.4	\$340.00	\$816.00
7/31/2015	Shane	Howarter	Draft Washington class representative's fact section for amended complaint	0.7	\$340.00	\$238.00
7/31/2015	Shane	Howarter	Call class members; draft facts to circulate to team.	1.3	\$340.00	\$442.00
7/31/2015	Steve	Lopez	Review stipulation by opposing counsel to extend response time.	0.3	\$415.00	\$124.50
7/31/2015	Steve	Lopez	Discuss expanding scope of class with S. Howarter and how to handle client intakes of non-CRV vehicles	0.3	\$415.00	\$124.50
8/3/2015	Dave	Stein	review class member contacts and confer with team re retentions related to same	0.3	\$605.00	\$181.50
8/4/2015	Dave	Stein	confer with S Lopez re upcoming deadlines, coordination; strategize re next steps in discovery, litigation	0.4	\$605.00	\$242.00
8/4/2015	Dave	Stein	review corporate disclosure statement	0.1	\$605.00	\$60.50
8/4/2015	Dave	Stein	review and revise public records requests to CARB and NHTSA	0.6	\$605.00	\$363.00
8/4/2015	Dave	Stein	review summary of new class member contacts; strategize re potential retention, next steps	0.8	\$605.00	\$484.00
8/4/2015	Shane	Howarter	Draft preservation letter for client; email to client	0.6	\$340.00	\$204.00
8/4/2015	Steve	Lopez	Review upcoming deadlines and confer with D Stein	0.1	\$415.00	\$41.50
8/11/2015	Shane	Howarter	Further revise CARB and NHTSA public records request	0.4	\$340.00	\$136.00
8/14/2015	Dave	Stein	review JPML order setting dates	0.1	\$605.00	\$60.50
8/14/2015	Shane	Howarter	Call class member	0.3	\$340.00	\$102.00
8/14/2015	Steve	Lopez	Call potential class member	0.2	\$415.00	\$83.00

8/14/2015	Steve	Lopez	Draft and email clients case status update regarding MDL proceedings.	0.3	\$415.00	\$124.50
8/18/2015	Dave	Stein	preliminary review of various response briefs to MDL motion; strategize re reply brief and oral argument	1.6	\$605.00	\$968.00
8/18/2015	Shane	Howarter	Read responses to MDL motion to strategize re: need for reply and to help D Stein check factual and procedural accuracy	0.6	\$340.00	\$204.00
8/19/2015	Dave	Stein	strategize re reply brief in MDL proceedings	0.2	\$605.00	\$121.00
8/21/2015	Dave	Stein	review class member contacts; strategize re possible state claims; supervise retention efforts in connection with same	0.8	\$605.00	\$484.00
8/24/2015	Steve	Lopez	Research location of various Honda departments for MDL reply brief	2.2	\$415.00	\$913.00
8/24/2015	Steve	Lopez	Research docket conditions in potential MDL venues	0.6	\$415.00	\$249.00
8/24/2015	Steve	Lopez	Research locations of various Honda executives for MDL brief	1.6	\$415.00	\$664.00
8/24/2015	Steve	Lopez	Draft MDL response brief	2.4	\$415.00	\$996.00
8/25/2015	Eric	Gibbs	review and revise MDL reply brief	0.6	\$805.00	\$483.00
8/25/2015	Steve	Lopez	review edits and suggestions from E. Gibbs and revise brief	1.2	\$415.00	\$498.00
8/25/2015	Steve	Lopez	Continue drafting MDL reply brief and circulate to team	3.8	\$415.00	\$1,577.00
9/8/2015	Dave	Stein	review class member contacts; strategize re retentions; confer with S Lopez re same	0.6	\$605.00	\$363.00
9/8/2015	Steve	Lopez	Speak with potential class members, draft and circulate facts to team	1.4	\$415.00	\$581.00
9/9/2015	Dave	Stein	calls with class members re litigation; strategize re amended complaint	1.2	\$605.00	\$726.00
9/11/2015	Dave	Stein	confer with S Lopez re transfer arguments, oral argument notice for MDL hearing	0.2	\$605.00	\$121.00
9/11/2015	Steve	Lopez	Speak with seven class members separately about the details of their potential cases and participation as class representatives; summarize factual scenarios for team; send follow-up emails to potential clients	5.1	\$415.00	\$2,116.50
9/14/2015	Steve	Lopez	Call with potential class member.	0.4	\$415.00	\$166.00
9/15/2015	Dave	Stein	review class member contacts; calls with class members	0.9	\$605.00	\$544.50
9/16/2015	Dave	Stein	review class member contacts	0.3	\$605.00	\$181.50
9/17/2015	Jason	Gibbs	calls with potential clients, respond to inquiries re status of case, update firm data base	2.3	\$190.00	\$437.00
9/18/2015	Dave	Stein	calls with class members about case; strategize re additional states for amended complaint	0.9	\$605.00	\$544.50
9/25/2015	Dave	Stein	review contacts from class members and strategize re state by state retentions, claims	1.3	\$605.00	\$786.50
9/28/2015	Dave	Stein	prepare for MDL hearing by reviewing various briefs relating to centralization and preferred transferee districts	1.6	\$605.00	\$968.00

9/29/2015	Dave	Stein	prepare for MDL hearing by further factual research into location of executives, departments, and other relevant activity; continue review of underlying briefs, complaints for same; confer with S Lopez re same	3.2	\$605.00	\$1,936.00
9/30/2015	Dave	Stein	travel to NY for MDL hearing; prepare for same; call with L Kiser re same; strategize re last factual investigation, research and confer with S Lopez re executing, results of same	9.2	\$605.00	\$5,566.00
9/30/2015	Steve	Lopez	continue factual research on Ohio/California connections for MDL hearing; call with D. Stein re same	7.6	\$415.00	\$3,154.00
10/1/2015	Dave	Stein	continue to prepare for MDL hearing; attend and argue same; confer with other defense, plaintiffs' counsel before and after same	6.2	\$605.00	\$3,751.00
10/2/2015	Steve	Lopez	Update clients regarding case status	0.6	\$415.00	\$249.00
10/4/2015	Dave	Stein	return travel to SF following MDL hearing	6.5	\$605.00	\$3,932.50
10/6/2015	Dave	Stein	review class member contacts and strategize re amended complaint strategy	0.6	\$605.00	\$363.00
10/9/2015	Dave	Stein	review MDL order transferring actions and strategize, confer re next steps	0.6	\$605.00	\$363.00
10/13/2015	Jason	Gibbs	respond to inquiries re status of case, calls with potential clients, update firm data base	0.4	\$190.00	\$76.00
10/15/2015	Jason	Gibbs	respond to inquiries re status of case, calls with potential clients, update firm data base	0.2	\$190.00	\$38.00
10/19/2015	Dave	Stein	review court order setting initial status conference; review local rules for same; confer with S Lopez re appearances, pro hacs, etc.; prepare and revise joint agenda for conference; confer with M Mallow, L Kiser re same; review opposing counsel edits; prepare email to all plaintiffs counsel re same.	2.7	\$605.00	\$1,633.50
10/19/2015	Steve	Lopez	Collect all parties' contact information in an email to begin putting together joint agenda	0.3	\$415.00	\$124.50
10/20/2015	Dave	Stein	emails with G Travaglio, C Cantor re joint agenda, etc.; emails with L Kiser re joint agenda, preparation for telephone conference, revisions to joint agenda; review email from E Myers re same; review edits to agenda by E Myers; further revisions to same; prepare email to plaintiffs' counsel re latest revisions	2.1	\$605.00	\$1,270.50
10/20/2015	Steve	Lopez	Prepare notice of appearances	0.4	\$415.00	\$166.00
10/21/2015	Dave	Stein	emails with L Kiser, E Meyers re joint agenda, submission of conference participants to court; prepare for and participate in telephone conference with opposing, co-counsel re tomorrow's hearing	1.4	\$605.00	\$847.00
10/22/2015	Dave	Stein	emails with M Troutman re coordination of tag-a-long case	0.1	\$605.00	\$60.50

10/22/2015	Dave	Stein	prepare for initial conference and participate in same by phone	1.6	\$605.00	\$968.00
10/22/2015	Eric	Gibbs	prepare for and participate in court status conference	2.2	\$805.00	\$1,771.00
10/22/2015	Steve	Lopez	Review draft preservation letter	0.5	\$415.00	\$207.50
10/22/2015	Steve	Lopez	confer with absent class member contacts about case status	0.3	\$415.00	\$124.50
10/28/2015	Dave	Stein	review incoming contacts from class members	0.7	\$605.00	\$423.50
10/30/2015	Dave	Stein	review incoming class member contacts and strategize re potential state by state litigation strategy	0.7	\$605.00	\$423.50
11/2/2015	Dave	Stein	strategize re leadership application	0.4	\$605.00	\$242.00
11/2/2015	Dave	Stein	review email from attorney contacted by class member; strategize re next steps	0.2	\$605.00	\$121.00
11/2/2015	Steve	Lopez	Review intake from potential class member, assess facts, and summarize for team	0.1	\$415.00	\$41.50
11/3/2015	Caroline	Corbitt	Confer with D Stein re drafting 23(g) motion and briefs.	0.3	\$365.00	\$109.50
11/3/2015	Dave	Stein	prepare for call re leadership applications; strategize re same and confer with C Corbitt re preparing 23g papers	0.4	\$605.00	\$242.00
11/5/2015	Caroline	Corbitt	Research local rules of S.D. Ohio and prior court opinions of Judge Watson relevance to motion for appointment as interim lead counsel. Locate and read examples of Rule 23(g) motions and associated declarations.	2.7	\$365.00	\$985.50
11/5/2015	Caroline	Corbitt	Draft declaration of Eric Gibbs ISO motion for appointment as interim lead counsel.	1.3	\$365.00	\$474.50
11/5/2015	Dave	Stein	review pending changes to FRCP for potential use in early discovery requests	0.4	\$605.00	\$242.00
11/6/2015	Caroline	Corbitt	Begin drafting Memo ISO Class Counsel appointment.	0.9	\$365.00	\$328.50
11/6/2015	Dave	Stein	review efforts taken to date for purpose of inclusion in 23(g) application and confer with C Corbitt re same; review and comment on draft declaration	1.7	\$605.00	\$1,028.50
11/6/2015	Steve	Lopez	Review 23(g) declaration to help provide personal knowledge about history of work done to date in case and provide suggested edits	1.4	\$415.00	\$581.00
11/9/2015	Caroline	Corbitt	Confer with D Stein re drafts and deadlines. Examine dockets of our past cases against Intel and Honda for relevant support for our resources brought to bear for this litigation. Finish revising EHG Declaration ISO interim lead counsel appointment.	2.4	\$365.00	\$876.00
11/9/2015	Caroline	Corbitt	Outline of memorandum ISO appointment as interim class counsel. Research SD Ohio law to incorporate into memorandum. Begin drafting memorandum.	7.1	\$365.00	\$2,591.50

11/9/2015	Dave	Stein	confer with C Corbitt re drafting strategy for leadership papers, next steps; review court's case management order for same; strategize re brief contents; review and revise the further revised draft of the Gibbs declaration in support of application	0.6	\$605.00	\$363.00
11/9/2015	Dave	Stein	prepare for, call with M McGuire re leadership applications	0.3	\$605.00	\$181.50
11/10/2015	Caroline	Corbitt	Finish researching and drafting 9-page memorandum ISO appointment as interim class counsel.	4.5	\$365.00	\$1,642.50
11/10/2015	Dave	Stein	provide suggestions to C Corbitt on outline for 23g brief	0.3	\$605.00	\$181.50
11/10/2015	Dave	Stein	review class member contacts; confer with S Lopez, J Gibbs re possible introduction of new repair procedure, questions for clients; strategize re next steps in light of new information; review prior settlement data related to MPG drop and calculate potential impact on this case	2.7	\$605.00	\$1,633.50
11/10/2015	Eric	Gibbs	c/w M Mallow re current status of repairs pursuant to TSB	0.3	\$805.00	\$241.50
11/10/2015	Jason	Gibbs	respond to inquiries re status of case, speak with potential clients re recent Honda fix, email updates to team	4.3	\$190.00	\$817.00
11/10/2015	Steve	Lopez	Discuss new fix with D. Stein and J. Gibbs	0.3	\$415.00	\$124.50
11/10/2015	Steve	Lopez	Research forum posts regarding new fix	0.3	\$415.00	\$124.50
11/11/2015	Caroline	Corbitt	Locate vibration bulletins issued by Honda. Create exhibit of bulletin. Research other 23(g) orders filed for GLG attorneys for quotations for motion. Research customer complaints on 2016 Honda CR-Vs and send to D Stein. Compare complaints filed in MDL to ours and send compared docs to D Stein.	4	\$365.00	\$1,460.00
11/11/2015	Caroline	Corbitt	Research and compile examples of prior auto cases in which firm had a leading role over the past decade. Determine case names, relevant docket numbers, details, quotes, etc.	2.3	\$365.00	\$839.50
11/11/2015	Dave	Stein	review draft application papers and revise same	5.6	\$605.00	\$3,388.00
11/11/2015	Dave	Stein	review recent class member contacts and repair documents	0.8	\$605.00	\$484.00
11/11/2015	Jason	Gibbs	respond to inquiries re status of case, calls with potential clients, update firm data base	2	\$190.00	\$380.00
11/12/2015	Caroline	Corbitt	Compare similarities between the six other complaints filed in the MDL and summarize for use in 23g motion.	2	\$365.00	\$730.00
11/12/2015	Caroline	Corbitt	Confer with D Stein on remaining tasks for motion. Research for citations and find and create exhibits of past appointments as class counsel and fee awards for inclusion with the motion ISO interim lead counsel appointment.	4.1	\$365.00	\$1,496.50
11/12/2015	Dave	Stein	continue revision of leadership papers	4.2	\$605.00	\$2,541.00

11/12/2015	Dylan	Hughes	Analysis re customer satisfaction program, confer with automotive consultant to assess viability of claims	3.3	\$685.00	\$2,260.50
11/12/2015	Steve	Lopez	Review contacts, run searches for additional contacts to ensure we did not miss anyone, and collect data in a report for D. Stein re potential new class representatives and/or states to cover in amended complaint; participate in call with automotive consultant	0.7	\$415.00	\$290.50
11/12/2015	Steve	Lopez	Further research online forums and engineering documents for information on potential repair suggested by Honda	1.8	\$415.00	\$747.00
11/12/2015	Steve	Lopez	Review new complaint filed, along with briefing schedule and docket	0.3	\$415.00	\$124.50
11/13/2015	Caroline	Corbitt	Verify citations and locate missing facts in motion for appointment as class counsel draft. Complete finding past appointments as class counsel and fee awards and creating exhibits to include in motion.	1	\$365.00	\$365.00
11/13/2015	Caroline	Corbitt	Final edits to E Gibbs declaration. Check citations and proofread brief. Prepare proposed order. Add paragraph citations for declaration and other missing citations to motion.	2.4	\$365.00	\$876.00
11/13/2015	Dave	Stein	confer with team re leadership papers; continue preparing, revising same; review submission by liaison counsel re same; review submission by competing applicants re same	5.7	\$605.00	\$3,448.50
11/13/2015	Eric	Gibbs	c/w D Stein and review and revise draft 23g motion	0.6	\$805.00	\$483.00
11/13/2015	Eric	Gibbs	review and revise leadership papers and confer with D Stein about strategy	1.2	\$805.00	\$966.00
11/16/2015	Dave	Stein	emails with M Troutman re leadership filings; confer with team re same	0.2	\$605.00	\$121.00
11/16/2015	Dave	Stein	review recent class member contacts	0.4	\$605.00	\$242.00
11/19/2015	Dave	Stein	review class member contacts, documents from same	0.6	\$605.00	\$363.00
11/19/2015	Jason	Gibbs	respond to inquiries re status of case, calls with potential clients, update firm data base	0.8	\$190.00	\$152.00
11/23/2015	Dave	Stein	review order re next joint agenda, status conference; call with M Troutman re preparing same; confer with E Gibbs re same	0.4	\$605.00	\$242.00
11/23/2015	Jason	Gibbs	respond to inquiries re status of case, calls with potential clients, update firm data base	0.9	\$190.00	\$171.00
11/24/2015	Jason	Gibbs	respond to inquiries re status of case, calls with potential clients, update firm data base	0.1	\$190.00	\$19.00
11/25/2015	Dave	Stein	incoming class member contacts	0.6	\$605.00	\$363.00
11/30/2015	Dave	Stein	email M Troutman re status hearing	0.1	\$605.00	\$60.50
12/1/2015	Caroline	Corbitt	Locate newest service bulletin re: vibration released by Honda and circulate.	0.4	\$365.00	\$146.00

12/1/2015	Dave	Stein	review email from chambers re status conference; prepare for same by reviewing leadership papers, prior orders and filings; participate in conference with court	2.1	\$605.00	\$1,270.50
12/1/2015	Dave	Stein	oversee efforts to locate newest TSB; review same	0.3	\$605.00	\$181.50
12/2/2015	Dave	Stein	confer with M Troutman re latest TSB issued by Honda	0.2	\$605.00	\$121.00
12/2/2015	Dave	Stein	review recent 9th Circuit decision re warranty claims for potential use in amended complaint	0.7	\$605.00	\$423.50
12/3/2015	Dave	Stein	review minute entry and order issued by court and strategize re next steps	0.3	\$605.00	\$181.50
12/3/2015	Dave	Stein	review class member contacts and strategize re adding states to amended complaint	0.6	\$605.00	\$363.00
12/3/2015	Jason	Gibbs	calls with potential clients	0.2	\$190.00	\$38.00
12/9/2015	Jason	Gibbs	respond to inquiries re status of case, calls with potential clients, update firm data base	0.4	\$190.00	\$76.00
12/15/2015	Jason	Gibbs	call with potential client	0.2	\$190.00	\$38.00
12/16/2015	Caroline	Corbitt	Confer with S. Lopez and J. Gibbs on recent call from client about new fix for vibration.	0.2	\$365.00	\$73.00
12/16/2015	Jason	Gibbs	respond to inquiries re status of case, calls with potential clients, update firm data base	1.9	\$190.00	\$361.00
12/16/2015	Steve	Lopez	Confer with C. Corbitt and J. Gibbs regarding class member contacts about continuing problems with CR-V	0.3	\$415.00	\$124.50
12/18/2015	Dave	Stein	review court order appointing counsel and confer with team re strategy, next steps; emails with liaison counsel re same; strategize re amended complaint, states to add, plaintiff vetting process; begin review of class member contacts for same	1.4	\$605.00	\$847.00
12/22/2015	Caroline	Corbitt	Update webpage for class member information	0.3	\$365.00	\$109.50
12/22/2015	Jason	Gibbs	respond to inquiries re status of case, calls with potential clients, update firm data base	0.9	\$190.00	\$171.00
12/23/2015	Eric	Gibbs	review court's leadership order, email M Mallow	0.3	\$805.00	\$241.50
12/23/2015	Jason	Gibbs	respond to inquiries re status of case, calls with potential clients, update firm data base	2.2	\$190.00	\$418.00
12/28/2015	Dave	Stein	obtain and review potential exemplar tolling agreements; prepare draft tolling agreement	1.1	\$605.00	\$665.50

12/28/2015	Dave	Stein	strategize re: case management plan and strategy in coming weeks, including ESI protocol, protective order, tolling agreement, client vetting process, and joint agenda for status hearing; emails with M Troutman re same; emails, call with M McMorrow re client vetting process; confer with E Gibbs re same, discussions with defendant;	2.4	\$605.00	\$1,452.00
12/28/2015	Dave	Stein	briefly review sample protective order from S. Dist. OH for potential adaptation for use in this case	0.3	\$605.00	\$181.50
12/28/2015	Dave	Stein	obtain and review potential exemplar ESI protocols and consider applicability in this litigation	0.4	\$605.00	\$242.00
12/28/2015	Dave	Stein	draft and revise joint agenda for upcoming status conference	0.8	\$605.00	\$484.00
12/28/2015	Dave	Stein	review, revise update to web page for class member information	0.2	\$605.00	\$121.00
12/29/2015	Caroline	Corbitt	Research and calculate dates for R26 f and other conferences and deadlines based on federal and local rules. Summarize and sent to D. Stein.	1.4	\$365.00	\$511.00
12/29/2015	Caroline	Corbitt	Confer with D. Stein and D. Hughes about creating a vetting questionnaire for named plaintiffs.	0.2	\$365.00	\$73.00
12/29/2015	Caroline	Corbitt	Draft initial screening and vetting questionnaire for plaintiffs.	2.8	\$365.00	\$1,022.00
12/29/2015	Caroline	Corbitt	Confer with D. Hughes and D. Stein about revisions to plaintiffs' question and implement revisions.	0.9	\$365.00	\$328.50
12/29/2015	Dave	Stein	strategize re coordination of various tasks over next month confer with E Gibbs, M Troutman re same and re discussions with Honda	0.7	\$605.00	\$423.50
12/29/2015	Dave	Stein	emails with defense counsel re joint agenda, tolling agreement, protective order	0.2	\$605.00	\$121.00
12/29/2015	Dave	Stein	review and revise protective order prepared by liaison counsel	0.7	\$605.00	\$423.50
12/29/2015	Dave	Stein	review edits to joint agenda by liaison counsel and further revise same for sending to Honda	0.4	\$605.00	\$242.00
12/29/2015	Dave	Stein	review time keeping protocols used in recent MDLs for potential utility here; confer with M Troutman re preparing a protocol for use in this case	0.8	\$605.00	\$484.00
12/29/2015	Dave	Stein	review draft plaintiff vetting sheet and revise same; confer with vetting team re same	0.8	\$605.00	\$484.00
12/29/2015	Dylan	Hughes	edit plaintiff questionnaire, discuss complaint screening strategy with D Stein, discuss questionnaire with Caroline Corbitt	2.4	\$685.00	\$1,644.00
12/29/2015	Eric	Gibbs	c/w M Mallow re potential resolution and status of matter	0.3	\$805.00	\$241.50
12/29/2015	Jason	Gibbs	respond to inquiries re status of case, calls with potential clients, update firm data base	0.2	\$190.00	\$38.00

12/29/2015	Steve	Lopez	Confer with C. Corbitt re plaintiff vetting for potential CR-V class representatives; strategize re potential plaintiff surveys and locate past examples for team	0.6	\$415.00	\$249.00
12/30/2015	Caroline	Corbitt	Research and respond to questions from D. Stein on R26 dates and information	0.3	\$365.00	\$109.50
12/30/2015	Caroline	Corbitt	For purposes of amended complaint, research 12b6 motions filed by defense counsel in previous automotive class actions	1.2	\$365.00	\$438.00
12/30/2015	Caroline	Corbitt	Call several class members about vibration problems and the lawsuit	2.2	\$365.00	\$803.00
12/30/2015	Dave	Stein	strategize re discovery needs and process; review district's standard rule 26 form	1.3	\$605.00	\$786.50
12/30/2015	Dave	Stein	review multiple rounds of Honda edits to joint agenda; emails and call with liaison counsel re same; emails and call with L Kiser re same; suggest further revisions of same	1.8	\$605.00	\$1,089.00
12/30/2015	Jason	Gibbs	respond to inquiries re status of case, calls with potential clients, update firm data base	2.6	\$190.00	\$494.00
12/31/2015	Caroline	Corbitt	Calls with class members	0.4	\$365.00	\$146.00
12/31/2015	Caroline	Corbitt	Call with potential client	0.9	\$365.00	\$328.50
12/31/2015	Dave	Stein	emails with automotive consultant re scheduling call to discuss service bulletin, amended complaint; confer with team re same	0.2	\$605.00	\$121.00
12/31/2015	Jason	Gibbs	Calls with class members and update firm data base	0.7	\$190.00	\$133.00
1/2/2016	Dave	Stein	review and revise liaison counsel's draft time keeping protocol; refer back to other protocols, spreadsheets used in other MDLs for same; emails with M Troutman re same and re local rules re sealing as they pertain to draft protective order	1.4	\$605.00	\$847.00
1/3/2016	Caroline	Corbitt	Call individuals who contacted our website regarding case. Interview them and summarize phone calls.	2.8	\$365.00	\$1,022.00
1/3/2016	Dave	Stein	review E Gibbs comments to timekeeping protocol; confer with E Gibbs re same; email M Troutman re same	0.4	\$605.00	\$242.00
1/3/2016	Dave	Stein	strategize re potential class representatives and evidence preservation	0.2	\$605.00	\$121.00
1/3/2016	Dave	Stein	prepare for pre-status conference call with defense counsel re: Rule 26 and discovery by re-reviewing Rule 26 rule changes and L Kiser email re same and strategizing re questions to ask and potential compromises	0.8	\$605.00	\$484.00
1/3/2016	Eric	Gibbs	review court's order, review and modify billing protocol, email exchanges re same	0.8	\$805.00	\$644.00
1/4/2016	Caroline	Corbitt	Call with automotive consultant and compile materials to provide for his review.	1.5	\$365.00	\$547.50

1/4/2016	Caroline	Corbitt	Call and email individuals who contacted our website about the case. Interview them and record notes. Create and send representation agreements.	8.2	\$365.00	\$2,993.00
1/4/2016	Dave	Stein	emails with M Troutman re protective order, time keeping protocol, status conference; prepare for call with Honda, status conference; confer with E Gibbs re same; participate in conference call with Honda re rule 26 timing, anticipated motion to dismiss, etc.; participate in status hearing; post-hearing call with liaison counsel to discuss time keeping protocol, conference, next steps	2.4	\$605.00	\$1,452.00
1/4/2016	Dave	Stein	prepare for and participate in call with automotive consultant to help with amended complaint	1.4	\$605.00	\$847.00
1/4/2016	Dave	Stein	review class member contacts and strategize re state claims for amended complaint	0.6	\$605.00	\$363.00
1/4/2016	Dylan	Hughes	Review driver complaints and other information to prepare for call with automotive consultant; hold call	2.8	\$685.00	\$1,918.00
1/4/2016	Eric	Gibbs	c/w co-counsel re billing protocol and other related case management issues; c/w D Stein re CMC and potential issues that may arise	1.2	\$805.00	\$966.00
1/4/2016	Steve	Lopez	Review call summaries from C. Corbitt and circulate thoughts to team	0.2	\$415.00	\$83.00
1/5/2016	Caroline	Corbitt	Call and email individuals who contacted our website about the case. Interview them and record notes. Create and send representation agreements.	5.7	\$365.00	\$2,080.50
1/5/2016	Dave	Stein	review and revise email update to various plaintiffs' counsel as well as last edits to timekeeping protocol; confer with E Gibbs and liaison counsel re same	0.8	\$605.00	\$484.00
1/5/2016	Dave	Stein	review recent class member contacts; confer with team re vetting process	0.3	\$605.00	\$181.50
1/5/2016	Steve	Lopez	Speak with potential class member	0.5	\$415.00	\$207.50
1/6/2016	Caroline	Corbitt	Call with automotive consultant	0.6	\$365.00	\$219.00
1/6/2016	Caroline	Corbitt	Prepare checklist to send to clients to ensure thorough collections of their documents	1.1	\$365.00	\$401.50
1/6/2016	Caroline	Corbitt	Confer with D. Stein about posting on case in forums. Draft post for his review.	0.5	\$365.00	\$182.50
1/6/2016	Caroline	Corbitt	Call and email individuals who contacted our website about the case. Interview them and record notes. Create and send representation agreements.	4.5	\$365.00	\$1,642.50
1/6/2016	Caroline	Corbitt	Confer with actual, potential clients about case status	1.4	\$365.00	\$511.00
1/6/2016	Dave	Stein	prepare for and participate in call with automotive expert re TSB, amended complaint	0.6	\$605.00	\$363.00

1/6/2016	Dave	Stein	confer with team re class member contacts and retentions; strategize re next steps, amended complaint	0.4	\$605.00	\$242.00
1/6/2016	Dave	Stein	emails, voice message to M McMorrow re case status	0.2	\$605.00	\$121.00
1/6/2016	Jason	Gibbs	respond to inquiries re status of case, calls with potential clients, update firm data base	2.5	\$190.00	\$475.00
1/7/2016	Caroline	Corbitt	Call with client [REDACTED]	0.3	\$365.00	\$109.50
1/7/2016	Caroline	Corbitt	Call client Emily Vellano.	0.6	\$365.00	\$219.00
1/7/2016	Caroline	Corbitt	Email client Julia Hsi and leave VM.	0.1	\$365.00	\$36.50
1/7/2016	Dave	Stein	call with M McMorrow re case staffing, moving forward	0.3	\$605.00	\$181.50
1/7/2016	Dave	Stein	confer with E Wallis, counsel for KY plaintiff, re vetting call; brief review of KY substantive law for strength of potential claims	0.7	\$605.00	\$423.50
1/7/2016	Jason	Gibbs	respond to inquiries re status of case, calls with potential clients, update firm data base	2.4	\$190.00	\$456.00
1/8/2016	Caroline	Corbitt	Locate and circulate new December vibration TSB. Compare to prior November TSB for any changes.	0.5	\$365.00	\$182.50
1/8/2016	Caroline	Corbitt	Call and email individuals who contacted our website about the case. Interview them and record notes. Create and send representation agreements.	3.9	\$365.00	\$1,423.50
1/11/2016	Caroline	Corbitt	Finish research into prior motion to dismiss arguments of defense counsel. Write memorandum summarizing arguments.	2.4	\$365.00	\$876.00
1/11/2016	Caroline	Corbitt	Draft new Plaintiffs' fact sections for amended complaint for five plaintiffs.	1.6	\$365.00	\$584.00
1/11/2016	Caroline	Corbitt	Begin research for memo concerning reports on whether fixes work for CR-V owners.	0.6	\$365.00	\$219.00
1/11/2016	Caroline	Corbitt	Email clients. Email people who have contacted our website.	0.5	\$365.00	\$182.50
1/11/2016	Caroline	Corbitt	Write current list of confirmed and likely reps and details of their status. Send to D. Stein.	1.2	\$365.00	\$438.00
1/11/2016	Caroline	Corbitt	Confer with D. Stein on status of client vetting and drafting plaintiff fact sections of complaint.	0.5	\$365.00	\$182.50
1/11/2016	Caroline	Corbitt	Prepare for vetting calls with clients of other firms in the MDL	0.3	\$365.00	\$109.50
1/11/2016	Dave	Stein	begin preparing amended complaint; review automotive consultant notes re: complaint, service bulletins; review driver complaints on various online forums, etc., and incorporate into draft; review 12b6 briefs, orders in recent comparable cases for pleading strategy, including C Corbitt memo	4.8	\$605.00	\$2,904.00
1/11/2016	Dave	Stein	email defense counsel re tolling agreement, protective order	0.1	\$605.00	\$60.50

1/11/2016	Dave	Stein	emails with co-counsel re various class representative options, vetting schedule; continue review of class member contacts, facts, and strategize re states to include, claims to plead; review C Corbitt write ups re various potential class reps and strategize re inclusion of same	1.9	\$605.00	\$1,149.50
1/12/2016	Caroline	Corbitt	Write email memo about whether fixes work for CR-V owners.	0.6	\$365.00	\$219.00
1/12/2016	Caroline	Corbitt	Draft additional plaintiff facts for inclusion in consolidated amended complaint. Revise according to feedback from D. Stein.	2.2	\$365.00	\$803.00
1/12/2016	Caroline	Corbitt	Locate link to and date of vibration video released by Honda America. Ascertain how many discrete vibration complaints are on the NHTSA site. Locate 2015 CR-V Warranty.	0.6	\$365.00	\$219.00
1/12/2016	Caroline	Corbitt	Prepare for vetting calls. Confer with D. Stein.	0.5	\$365.00	\$182.50
1/12/2016	Caroline	Corbitt	Vetting call with potential class representative [REDACTED]	0.5	\$365.00	\$182.50
1/12/2016	Caroline	Corbitt	Draft email to Eugene Turn about his client [REDACTED]	0.2	\$365.00	\$73.00
1/12/2016	Caroline	Corbitt	Vetting call with potential class representative Richard Beaulieu.	0.5	\$365.00	\$182.50
1/12/2016	Caroline	Corbitt	Vetting call with potential class representative [REDACTED].	0.7	\$365.00	\$255.50
1/12/2016	Caroline	Corbitt	Vetting call with potential class representative Vivian Romaya.	0.5	\$365.00	\$182.50
1/12/2016	Caroline	Corbitt	Email and call current clients about amended complaint. Draft additional questions to ask them.	0.7	\$365.00	\$255.50
1/12/2016	Caroline	Corbitt	Call individuals who expressed interest in the litigation.	1	\$365.00	\$365.00
1/12/2016	Dave	Stein	strategize re client vetting and confer with C Corbitt, E Gibbs re same; review notes from vetting calls and help with decisions on class representative list, claims to plead in complaint	1.7	\$605.00	\$1,028.50
1/12/2016	Dave	Stein	strategize re additional edits needed for amended complaint and confer with C Corbitt re same; outline new allegations and highlight additional areas for edits; review warranty booklet and amplify allegations relating to breach of warranties; draft, revise class action allegations, introduction, other sections of the complaint	6.9	\$605.00	\$4,174.50
1/12/2016	Dave	Stein	emails with defense counsel re tolling agreement, protective order	0.2	\$605.00	\$121.00
1/12/2016	Dave	Stein	draft and revise correspondence to opposing counsel re need for additional demand letters	0.6	\$605.00	\$363.00
1/12/2016	Eric	Gibbs	c/w D Stein re named plaintiff, review and approve email re same, c/w D Stein re staffing interviews	0.4	\$805.00	\$322.00
1/12/2016	Jason	Gibbs	respond to inquiries re status of case, update firm data base, calls with clients/potential clients	3	\$190.00	\$570.00
1/13/2016	Caroline	Corbitt	Draft emails to clients and co-counsel for approval of D. Stein. Create separate documents with draft facts section for class representatives and send to co-counsel or client.	1.7	\$365.00	\$620.50

1/13/2016	Caroline	Corbitt	Draft plaintiff facts for Maticcik and [REDACTED]	0.4	\$365.00	\$146.00
1/13/2016	Caroline	Corbitt	Draft three additional plaintiffs fact sections	0.8	\$365.00	\$292.00
1/13/2016	Caroline	Corbitt	Call client [REDACTED].	0.3	\$365.00	\$109.50
1/13/2016	Caroline	Corbitt	Call potential class representative John Maticcik.	0.6	\$365.00	\$219.00
1/13/2016	Caroline	Corbitt	Call with potential class representative [REDACTED].	0.6	\$365.00	\$219.00
1/13/2016	Caroline	Corbitt	Call with potential class representative [REDACTED].	1.5	\$365.00	\$547.50
1/13/2016	Caroline	Corbitt	Email clients about arranging phone calls to verify facts.	0.4	\$365.00	\$146.00
1/13/2016	Caroline	Corbitt	Call with potential class representative [REDACTED].	1	\$365.00	\$365.00
1/13/2016	Caroline	Corbitt	Call with potential class representative Michael Stanley.	0.5	\$365.00	\$182.50
1/13/2016	Caroline	Corbitt	Call with [REDACTED] about mode 1 vibration fix. Create and send attorney representation agreement.	0.6	\$365.00	\$219.00
1/13/2016	Dave	Stein	continue preparing amended complaint factual section; review news and technical articles for same; confer with team re same and confer with liaison counsel re same and review their preliminary comments, revisions; review and revise first plaintiff-specific fact sections; revise California claims; research warranty demand requirements in statutes, case law	5.7	\$605.00	\$3,448.50
1/13/2016	Dave	Stein	legal research into Maine's two consumer protection statutes including available remedies and presuit demand requirements; draft and revise Maine UDAP claim in amended complaint	1.4	\$605.00	\$847.00
1/13/2016	Dave	Stein	review client vetting notes and confer with C Corbitt re same; strategize re claims to include; review class member contacts	1.3	\$605.00	\$786.50
1/13/2016	Geoffrey	Munroe	Discuss master MDL complaint with DS, including potential common law claims and choice-of-law issues	0.5	\$660.00	\$330.00
1/13/2016	Jason	Gibbs	respond to inquiries re status of case, update firm data base, calls with clients/potential clients	0.8	\$190.00	\$152.00
1/14/2016	Caroline	Corbitt	Draft facts for class representative Julia His	0.3	\$365.00	\$109.50
1/14/2016	Caroline	Corbitt	Draft fact section for class representative Patricia Flannigan.	0.3	\$365.00	\$109.50
1/14/2016	Caroline	Corbitt	Call with class representative Bob Nonni to go over his facts section.	0.5	\$365.00	\$182.50
1/14/2016	Caroline	Corbitt	Vetting call with potential class representative [REDACTED]	0.8	\$365.00	\$292.00
1/14/2016	Caroline	Corbitt	Confer with D. Stein and J. Gibbs about phone call status and further interviews.	0.2	\$365.00	\$73.00
1/14/2016	Caroline	Corbitt	Call with potential class representative [REDACTED]	0.6	\$365.00	\$219.00
1/14/2016	Caroline	Corbitt	Call with class rep Emily Vellano to verify her facts section.	0.3	\$365.00	\$109.50
1/14/2016	Caroline	Corbitt	Call with class rep Ashley Payan to verify her facts section.	0.4	\$365.00	\$146.00
1/14/2016	Caroline	Corbitt	Vetting call with potential class representative Patricia Flannigan.	1	\$365.00	\$365.00
1/14/2016	Caroline	Corbitt	Leave message for clients. Send emails to schedule calls.	0.5	\$365.00	\$182.50

1/14/2016	Caroline	Corbitt	Vetting call with potential class representative [REDACTED].	0.5	\$365.00	\$182.50
1/14/2016	Caroline	Corbitt	Update D. Stein on client calls.	0.2	\$365.00	\$73.00
1/14/2016	Caroline	Corbitt	Call with class representative Julia Hsi to review her facts.	0.2	\$365.00	\$73.00
1/14/2016	Caroline	Corbitt	Call with client [REDACTED] about the current vibration in his car and the filing of the amended complaint.	0.5	\$365.00	\$182.50
1/14/2016	Dave	Stein	review and revise plaintiff specific facts sections; continue preparing state causes of action; research UDAP elements of various state statutes including case law interpreting same; confer with team, liaison counsel re same	7.3	\$605.00	\$4,416.50
1/14/2016	Dave	Stein	confer with automotive consultant re amended complaint	0.4	\$605.00	\$242.00
1/14/2016	Dave	Stein	review class member contacts and notes from vetting calls; strategize re claims to include and confer with C Corbitt re same	1.7	\$605.00	\$1,028.50
1/14/2016	Jason	Gibbs	respond to inquiries re status of case, update firm data base, calls with clients/potential clients	2.4	\$190.00	\$456.00
1/14/2016	Jason	Gibbs	respond to inquiries re status of case, update firm data base, calls with clients/potential clients	0.6	\$190.00	\$114.00
1/15/2016	Caroline	Corbitt	Create spreadsheet of vetting and class representatives. Send to D. Stein.	1.8	\$365.00	\$657.00
1/15/2016	Caroline	Corbitt	Call with class representative Ashley Payan to ask further vetting questions.	0.2	\$365.00	\$73.00
1/15/2016	Caroline	Corbitt	Vetting call and draft fact section of class rep Melinda Cushing.	1.6	\$365.00	\$584.00
1/15/2016	Caroline	Corbitt	Write update on current states in complaint and sent to D. Stein.	0.2	\$365.00	\$73.00
1/15/2016	Caroline	Corbitt	Draft additional plaintiff facts sections. Send to D. Stein for his review.	0.6	\$365.00	\$219.00
1/15/2016	Caroline	Corbitt	Calls people who wrote in our website about CR-Vs vibrating.	1	\$365.00	\$365.00
1/15/2016	Caroline	Corbitt	Vetting call with potential class Tom Prychitko.	1	\$365.00	\$365.00
1/15/2016	Caroline	Corbitt	Confer with D. Stein on client vetting, current status, etc.	0.5	\$365.00	\$182.50
1/15/2016	Caroline	Corbitt	Call client Michael Stanley.	0.2	\$365.00	\$73.00
1/15/2016	Caroline	Corbitt	Call with client Bakh Inamov. Write email summary of call to D. Stein.	0.2	\$365.00	\$73.00
1/15/2016	Caroline	Corbitt	Call with client [REDACTED].	0.5	\$365.00	\$182.50
1/15/2016	Dave	Stein	assist with client vetting, final decisions re class representatives, claims; confer with C Corbitt re same, next steps	0.7	\$605.00	\$423.50
1/15/2016	Dave	Stein	review two rounds of defendant edits to tolling agreement and liaison counsel comments on same; revise same; call with defense counsel re same	1.3	\$605.00	\$786.50
1/15/2016	Dave	Stein	prepare demand letter for clients likely to be named in amended complaint; call, emails with defense counsel re same	1.8	\$605.00	\$1,089.00

1/15/2016	Dave	Stein	continue preparing amended complaint; research law under Michigan, Rhode Island, and Virginia for potential UDAP, secret warranty claims and draft new claims for complaint; review and revise plaintiff-specific fact sections	5.1	\$605.00	\$3,085.50
1/15/2016	Jason	Gibbs	respond to inquiries re status of case, calls with potential clients, update firm data base	0.5	\$190.00	\$95.00
1/16/2016	Caroline	Corbitt	Call class representative Michael Stanley to verify the accuracy of his facts section.	0.2	\$365.00	\$73.00
1/16/2016	Caroline	Corbitt	Call with class representative Michelle and Robert Bergendhal to go over their facts section. Email D. Stein about conversation.	0.6	\$365.00	\$219.00
1/16/2016	Caroline	Corbitt	Email co-counsel Eugene Turin in response to the class rep approved facts he sent.	0.2	\$365.00	\$73.00
1/16/2016	Caroline	Corbitt	Revise client facts according to my calls with them. Send redlined docs to D. Stein. Add facts into complaint.	2.2	\$365.00	\$803.00
1/16/2016	Caroline	Corbitt	Added missing factual details to draft of complaint. Send to D. Stein.	0.4	\$365.00	\$146.00
1/16/2016	Caroline	Corbitt	Call individual who complained about vibrating CR-V on our website.	0.1	\$365.00	\$36.50
1/16/2016	Dave	Stein	review edits to various plaintiff facts sections and revise same; confer with C Corbitt re same	0.9	\$605.00	\$544.50
1/17/2016	Caroline	Corbitt	Email Eugene Turin in response to client facts sections.	0.1	\$365.00	\$36.50
1/17/2016	Caroline	Corbitt	Line by line edit of consolidated amended complaint. Research additional facts and incorporate.	1.8	\$365.00	\$657.00
1/17/2016	Caroline	Corbitt	Incorporate edits from co-counsel into working version of amended complaint. Send to D. Stein.	0.3	\$365.00	\$109.50
1/17/2016	Caroline	Corbitt	Watch April Honda YouTube video concerning vibration to verify factual allegations.	0.1	\$365.00	\$36.50
1/17/2016	Caroline	Corbitt	Email class representative Tom Prychitko.	0.1	\$365.00	\$36.50
1/17/2016	Caroline	Corbitt	Attempt to contact clients Bakh Inamov and [REDACTED]	0.2	\$365.00	\$73.00
1/17/2016	Dave	Stein	revise demand letter; confer with liaison counsel re same	0.4	\$605.00	\$242.00
1/17/2016	Dave	Stein	further revision of amended complaint; confer with liaison counsel re additional potential claims and review their comments and suggested revisions to draft complaint	3.2	\$605.00	\$1,936.00
1/17/2016	Geoffrey	Munroe	Review demand letter and email suggestions to D. Stein	0.3	\$660.00	\$198.00
1/18/2016	Dave	Stein	emails with defense counsel, liaison counsel re tolling agreement; review two rounds of defense counsel suggestions re same; strategize re same	0.9	\$605.00	\$544.50
1/18/2016	Dave	Stein	review co-counsel, team edits to demand letter; further revise, finalize same; email defense counsel re same	0.7	\$605.00	\$423.50

1/18/2016	Dave	Stein	confer with automotive consultant re his suggestions for amended complaint; further revise amended complaint; confer with C Corbitt, liaison counsel, various other plaintiffs' counsel re same	1.4	\$605.00	\$847.00
1/18/2016	Eric	Gibbs	review draft amended complaint and demand letter and provide comments	1.8	\$805.00	\$1,449.00
1/19/2016	Caroline	Corbitt	Research presuit demand requirements of Texas, Maine, and Massachusetts.	0.5	\$365.00	\$182.50
1/19/2016	Caroline	Corbitt	Create preservation letters for new clients.	0.2	\$365.00	\$73.00
1/19/2016	Caroline	Corbitt	Call with ██████████ to discuss her current repair status and her questions.	0.4	\$365.00	\$146.00
1/19/2016	Caroline	Corbitt	Email ██████████ in response to her question about car thermometer fix.	0.1	\$365.00	\$36.50
1/19/2016	Caroline	Corbitt	Email clients.	0.2	\$365.00	\$73.00
1/19/2016	Caroline	Corbitt	Send consolidated amended complaint to individuals I have been in touch with about their vehicles.	0.4	\$365.00	\$146.00
1/19/2016	Dave	Stein	review co-counsel suggestions for edits to complaint and further revise complaint based on same; final review, revision of complaint for filing; confer with liaison counsel, team re same	4.2	\$605.00	\$2,541.00
1/19/2016	Dave	Stein	review and revise preservation template for class representatives	0.4	\$605.00	\$242.00
1/19/2016	Geoffrey	Munroe	Emails with D Stein re pleading requested relief, review draft complaint	0.3	\$660.00	\$198.00
1/19/2016	Geoffrey	Munroe	Emails with D. Stein re prayer and form of pleading relief requested; review draft complaint portions	0.5	\$660.00	\$330.00
1/21/2016	Caroline	Corbitt	Answer call from person interested in additional info about the lawsuit.	0.2	\$365.00	\$73.00
1/21/2016	Dave	Stein	email opposing counsel re protective order	0.1	\$605.00	\$60.50
1/21/2016	Dave	Stein	strategize re complaint meet/confer; emails with M Troutman re same	0.3	\$605.00	\$181.50
1/22/2016	Caroline	Corbitt	Update informational webpage for class members	1.1	\$365.00	\$401.50
1/22/2016	Dave	Stein	emails with defense counsel re protective order, meet/confer re amended complaint	0.1	\$605.00	\$60.50
1/22/2016	Dave	Stein	prepare for Rule 26 conference	0.4	\$605.00	\$242.00
1/22/2016	Dave	Stein	review class member contact re 2016 vibration and confer with C Corbitt re same	0.2	\$605.00	\$121.00
1/25/2016	Caroline	Corbitt	Prepare mass email to class members about case status and revise according to D. Stein edits.	1.6	\$365.00	\$584.00
1/25/2016	Caroline	Corbitt	Return phone call of client Michael Stanley.	0.2	\$365.00	\$73.00
1/25/2016	Dave	Stein	emails with M Troutman re amended complaint meet/confer call	0.2	\$605.00	\$121.00
1/25/2016	Dave	Stein	review class member contacts and confer with C Corbitt re return calls to same	0.2	\$605.00	\$121.00

1/25/2016	Dave	Stein	review and revise draft email to all class member contacts updating them on status of litigation; review and revise updated informational webpage for same; confer with C Corbitt re same	0.6	\$605.00	\$363.00
1/26/2016	Caroline	Corbitt	Intake and review client documents and confer with clients.	1	\$365.00	\$365.00
1/26/2016	Dave	Stein	review standard ND Ohio ESI stipulation for potential use here; review and revise ESI production document for attachment to same; confer with C Corbitt re finalizing and circulating same	1.2	\$605.00	\$726.00
1/26/2016	Dave	Stein	prepare for call with Honda to meet/confer on amended complaint, briefing re same; review past 12b6 motions filed by defense team for same and briefly review complaint and prior court orders for same; participate in call; confer with liaison counsel, team following same and strategize re approach	1.8	\$605.00	\$1,089.00
1/26/2016	Dave	Stein	legal research and strategize re issue raised by Honda relating to status of prior named plaintiffs not named in amended complaint; review Manual for Complex Lit, Wright & Miller, caselaw, and memos from other litigation re same; confer with E Gibbs re same	3.2	\$605.00	\$1,936.00
1/26/2016	Dave	Stein	emails with defense counsel re protective order	0.1	\$605.00	\$60.50
1/26/2016	Dave	Stein	confer with C Corbitt re letters to various state government entities	0.1	\$605.00	\$60.50
1/26/2016	Dave	Stein	strategize re joint agenda due later this week; outline points to cover in same	0.4	\$605.00	\$242.00
1/26/2016	Eric	Gibbs	c/w M Mallow re resolution strategies, approach	0.5	\$805.00	\$402.50
1/26/2016	Eric	Gibbs	c/w D Stein re unfiled cases, strategy to address	0.6	\$805.00	\$483.00
1/26/2016	Jason	Gibbs	respond to inquiries re status of case, update firm data base, calls with clients/potential clients	0.2	\$190.00	\$38.00
1/27/2016	Caroline	Corbitt	Ascertain Illinois requirements for copies of complaints to the Attorney General. Send for mailing; confer with D Stein re letters	0.5	\$365.00	\$182.50
1/27/2016	Dave	Stein	review extensive proposed revisions to protective order from defense counsel; confer with liaison counsel re same and strategize re next steps; review liaison counsel revisions, comments re same and strategize re finalization, negotiation of same	1.9	\$605.00	\$1,149.50
1/27/2016	Dave	Stein	prepare for, participate in call with liaison call to discuss possible amendment of complaint, Honda's motion to dismiss arguments, other strategy issues; confer with team re same	1.3	\$605.00	\$786.50
1/27/2016	Dave	Stein	call with M McMorrow re status of formerly named plaintiffs, next steps	0.3	\$605.00	\$181.50
1/27/2016	Dave	Stein	draft and revise joint agenda; confer with liaison counsel, E Gibbs re same	1.3	\$605.00	\$786.50

1/27/2016	Dave	Stein	confer with liaison counsel re ND Ohio ESI standard order; email defense counsel re same	0.2	\$605.00	\$121.00
1/27/2016	Eric	Gibbs	review / comment on joint agenda to D Stein	0.2	\$805.00	\$161.00
1/28/2016	Dave	Stein	review liaison counsel revisions, comments on draft joint agenda; further revise same; emails with liaison counsel, defense counsel re same	0.8	\$605.00	\$484.00
1/28/2016	Dave	Stein	preparation for rule 26 discussions	0.6	\$605.00	\$363.00
1/28/2016	Dave	Stein	review recent class member contacts and strategize re possible additional claims	0.4	\$605.00	\$242.00
1/29/2016	Caroline	Corbitt	Email re: status of mass update to case contacts and website update.	0.1	\$365.00	\$36.50
1/29/2016	Caroline	Corbitt	Respond to emails from clients Julia Hsi and Michelle Bergendahl.	0.2	\$365.00	\$73.00
1/29/2016	Dave	Stein	email liaison counsel re joint agenda, status conference; begin preparation for status conference	0.4	\$605.00	\$242.00
1/29/2016	Dave	Stein	review class member contacts and confer with C Corbitt re communications with same	0.2	\$605.00	\$121.00
2/1/2016	Caroline	Corbitt	Call from client Julia Hsi.	0.1	\$365.00	\$36.50
2/1/2016	Caroline	Corbitt	Review final draft of mass update to those who have contacted our website for case info and approve for sending.	0.1	\$365.00	\$36.50
2/1/2016	Dave	Stein	prepare for telephonic status conference and confer with M Troutman re same	1.4	\$605.00	\$847.00
2/1/2016	Dave	Stein	prepare for R26 conference with Honda; review SD OH Rule 26 form, Rule 26 and advisory committee notes, ND OH ESI standard order; review TSBs; begin outline of discovery needs, questions re data systems, custodians, etc.	2.1	\$605.00	\$1,270.50
2/2/2016	Caroline	Corbitt	Rule 26(f) call with defendants and co-counsel.	1	\$365.00	\$365.00
2/2/2016	Caroline	Corbitt	Draft Rule 26f report and send to D. Stein.	2.5	\$365.00	\$912.50
2/2/2016	Caroline	Corbitt	Confer with D. Stein re: ongoing process of obtaining class representative documents and vehicle inspections	0.2	\$365.00	\$73.00
2/2/2016	Dave	Stein	prepare for and conduct rule 26 call with defense counsel	1.4	\$605.00	\$847.00
2/2/2016	Dave	Stein	strategize re further amended complaint and schedule for briefing in light of Honda's comments on 26f call; call with M Troutman re same	0.6	\$605.00	\$363.00
2/2/2016	Dave	Stein	draft, revise proposed order and stipulation re schedule for pleadings; review local rules of court and previous joint agenda for same; emails with M Troutman re same and review M Troutman edits to same; email defense counsel re same	0.9	\$605.00	\$544.50
2/2/2016	Dave	Stein	strategize re class representative production of documents, scheduling of inspections per Honda's request; confer with C Corbitt re proceeding with same	0.4	\$605.00	\$242.00

2/2/2016	Dave	Stein	review, revise draft Rule 26 report; confer with C Corbitt re same	0.4	\$605.00	\$242.00
2/2/2016	Dave	Stein	strategize re inclusion of unjust enrichment claim in further amended complaint	0.2	\$605.00	\$121.00
2/2/2016	Dave	Stein	review new class member contacts and strategize re potential new claims	0.4	\$605.00	\$242.00
2/3/2016	Caroline	Corbitt	Revise Rule 26f Report according to feedback from D. Stein.	0.9	\$365.00	\$328.50
2/3/2016	Caroline	Corbitt	Revise R26f report according to feedback from D. Stein.	0.4	\$365.00	\$146.00
2/3/2016	Caroline	Corbitt	Call co-counsel Mark Troutman re: client vetting calls.	0.1	\$365.00	\$36.50
2/3/2016	Dave	Stein	call to, emails with M McMorrow re absent class representative issue raised by Honda	0.1	\$605.00	\$60.50
2/3/2016	Dave	Stein	continuing research into issue raised by Honda re: named plaintiffs not listed in amended complaint; review GM Ignition order, memo re same	0.8	\$605.00	\$484.00
2/3/2016	Dave	Stein	draft and revise correspondence to defense counsel following Rule 26 conference	1.4	\$605.00	\$847.00
2/3/2016	Dave	Stein	review modified draft of Rule 26 report and further revise same; strategize re schedule, discovery	1.2	\$605.00	\$726.00
2/3/2016	Dave	Stein	confer with M Troutman re new class member contact and follow up of same	0.1	\$605.00	\$60.50
2/4/2016	Caroline	Corbitt	Call with person who contacted co-counsel M. Troutman about vibrating CR-V. Confer with M. Troutman after call.	0.5	\$365.00	\$182.50
2/4/2016	Dave	Stein	review protective order featuring latest revisions by both sides; confer with M Troutman re same	0.4	\$605.00	\$242.00
2/4/2016	Dave	Stein	finalize Rule 26 report for circulation to co-counsel; correspondence to opposing counsel related to same; confer with liaison counsel re same; review co-counsel suggested revisions and comments re same; finalize for sending to defense counsel	1.6	\$605.00	\$968.00
2/4/2016	Dave	Stein	review court order no. 4; confer with C Corbitt re same	0.2	\$605.00	\$121.00
2/5/2016	Caroline	Corbitt	Confer with D. Stein re: acquiring documents from clients and scheduling inspections.	0.1	\$365.00	\$36.50
2/5/2016	Caroline	Corbitt	Call clients Ashley Payan, Bob Nonni, Emily Vellano, and Michael Stanley about document collection for production to Honda.	2.2	\$365.00	\$803.00
2/5/2016	Caroline	Corbitt	Email attorneys of other class representatives asking them to arrange phone calls with their clients and me to go over document collection.	0.3	\$365.00	\$109.50
2/5/2016	Caroline	Corbitt	Respond to messages received from mass email blast.	0.9	\$365.00	\$328.50
2/5/2016	Dave	Stein	strategize re initial disclosures, amended complaint; review class member contacts for same; confer with C Corbitt re calls to class representatives and absent class members; confer with M McMorrow, liaison counsel re same	1.2	\$605.00	\$726.00

2/5/2016	Dave	Stein	finalize, send draft rule 26 report, email to defense counsel	0.2	\$605.00	\$121.00
2/8/2016	Caroline	Corbitt	Call, email with class rep Melissa Cushing to go over document production and upcoming vehicle inspection	0.3	\$365.00	\$109.50
2/8/2016	Caroline	Corbitt	Email D. Stein about clients Michelle and Robert Bergendahl.	0.1	\$365.00	\$36.50
2/8/2016	Caroline	Corbitt	Email four clients re: document collection	0.3	\$365.00	\$109.50
2/8/2016	Caroline	Corbitt	Confer with D. Stein on case strategy in advance of amended complaint.	0.4	\$365.00	\$146.00
2/8/2016	Caroline	Corbitt	Call with class rep Bakh Inamov to discuss document production and upcoming vehicle inspection.	0.3	\$365.00	\$109.50
2/8/2016	Caroline	Corbitt	Send several emails to co-counsel and D. Stein about scheduling phone calls with class reps and repair issue of a class representative.	0.5	\$365.00	\$182.50
2/8/2016	Caroline	Corbitt	Call with class rep John Maticcik to go over document production and upcoming vehicle inspection.	0.5	\$365.00	\$182.50
2/8/2016	Caroline	Corbitt	Email class rep John Maticcik.	0.1	\$365.00	\$36.50
2/8/2016	Dave	Stein	review defense counsel email re initial disclosures, document production; strategize re next steps, response; draft, revise response to same; review defense counsel's subsequent email re same and re the Rule 26 report; strategize, draft, and revise response to same; confer with C Corbitt re same and re application to initial disclosures, initial discovery requests	1.3	\$605.00	\$786.50
2/8/2016	Dave	Stein	confer with C Corbitt re calls with clients to discuss inspections, document productions, amended complaint; strategize re same	0.4	\$605.00	\$242.00
2/8/2016	Dave	Stein	strategize re fraud by omission claim in amended complaint; email M Troutman re legal research, memo for same	0.2	\$605.00	\$121.00
2/8/2016	Dave	Stein	begin outline of potential areas of discovery, requests; confer at length with D Hughes re same	1.8	\$605.00	\$1,089.00
2/8/2016	Dave	Stein	email M Troutman re legal research, memo responding to Honda arguments re fraud by omission claim	0.1	\$605.00	\$60.50
2/8/2016	Dave	Stein	review class member contacts and strategize re same for further amended complaint; confer with C Corbitt re same	0.4	\$605.00	\$242.00
2/9/2016	Caroline	Corbitt	Call with class rep Patricia Flanigan to discuss document production and upcoming inspections.	0.3	\$365.00	\$109.50
2/9/2016	Caroline	Corbitt	Call with class rep Richard Beaulieu to discuss document production and upcoming inspections.	0.3	\$365.00	\$109.50
2/9/2016	Caroline	Corbitt	Leave voicemail with and email class rep Julia Hsi.	0.1	\$365.00	\$36.50
2/9/2016	Caroline	Corbitt	Call with class rep Vivian Romaya to discuss document production and upcoming inspections.	0.4	\$365.00	\$146.00

2/9/2016	Caroline	Corbitt	Call with Michelle and Robert Bergendahl about document collection and upcoming inspection.	0.5	\$365.00	\$182.50
2/9/2016	Caroline	Corbitt	Respond to emails from website contacts in response to mass update.	1	\$365.00	\$365.00
2/9/2016	Caroline	Corbitt	Answer call from website contact about case.	0.2	\$365.00	\$73.00
2/9/2016	Caroline	Corbitt	Call website contacts about their CR-Vs.	1	\$365.00	\$365.00
2/9/2016	Dave	Stein	emails with M Troutman re legal research into fraud by omission claim in response to Honda concerns	0.2	\$605.00	\$121.00
2/10/2016	Caroline	Corbitt	Call with class rep Julia Hsi to discuss document collection and upcoming inspection.	0.2	\$365.00	\$73.00
2/10/2016	Caroline	Corbitt	Confer with D. Stein. Send him list of plaintiffs who have not yet had fixes on vehicles.	0.3	\$365.00	\$109.50
2/10/2016	Caroline	Corbitt	Call and email individuals who have contacted the firm through our website to complain about their CR-Vs.	3	\$365.00	\$1,095.00
2/10/2016	Caroline	Corbitt	Email co-counsel about setting up vetting call with potential class rep.	0.1	\$365.00	\$36.50
2/10/2016	Dave	Stein	prepare for and call with M McMorrow re client vetting, initial disclosures, legal research assignment; follow up email to M McMorrow re same	0.4	\$605.00	\$242.00
2/10/2016	Dave	Stein	emails with E Wallis re dismissal of KY, TN cases; strategize re same	0.2	\$605.00	\$121.00
2/10/2016	Dave	Stein	review, revise correspondence to estate of deceased former class representative; confer with S Lopez re same	0.3	\$605.00	\$181.50
2/10/2016	Dave	Stein	further research into issue of MDL consolidated complaint and its operation on unnamed plaintiffs	0.7	\$605.00	\$423.50
2/10/2016	Dave	Stein	review new class member contact and confer with C Corbitt re state's claims	0.3	\$605.00	\$181.50
2/10/2016	Steve	Lopez	Draft email to next kin of deceased client; discuss email with D. Stein	0.7	\$415.00	\$290.50
2/11/2016	Caroline	Corbitt	Conduct vetting call with client of co-counsel.	0.5	\$365.00	\$182.50
2/11/2016	Caroline	Corbitt	Call with potential client [REDACTED]. Create and send her representation agreement. Email her my contact info.	0.9	\$365.00	\$328.50
2/11/2016	Caroline	Corbitt	Call and email individuals who have contacted us on our website to complain about their vibrating vehicles.	0.6	\$365.00	\$219.00
2/11/2016	Dave	Stein	emails with M Mallow re dismissal of former named plaintiffs' claims; confer with C Corbitt re drafting same	0.2	\$605.00	\$121.00
2/11/2016	Dave	Stein	emails with L Kiser re initial disclosure deadlines; strategize re same	0.2	\$605.00	\$121.00
2/11/2016	Dave	Stein	confer with C Corbitt re ongoing plaintiff vetting for further amended complaint and strategize re additional state claims	0.7	\$605.00	\$423.50
2/12/2016	Caroline	Corbitt	Email co-counsel re: class rep John Maticsk transmission issue.	0.1	\$365.00	\$36.50

2/12/2016	Caroline	Corbitt	Call with class rep Tom Prychitko to discuss document collection and upcoming inspection	0.4	\$365.00	\$146.00
2/12/2016	Caroline	Corbitt	Email client Emily Vellano in response to her question on document collection.	0.2	\$365.00	\$73.00
2/12/2016	Caroline	Corbitt	Email D. Tizoli about scanning client documents.	0.1	\$365.00	\$36.50
2/12/2016	Caroline	Corbitt	Prepare notices of voluntary dismissal for five class representatives who were not included in the first amended complaint.	2.2	\$365.00	\$803.00
2/12/2016	Caroline	Corbitt	Interview and vet potential client Robert Fennes. Create representation agreement and send to him.	1.2	\$365.00	\$438.00
2/12/2016	Dave	Stein	emails with M Troutman re Ohio client and vehicle inspection	0.2	\$605.00	\$121.00
2/12/2016	Dave	Stein	research, investigation into Honda databases, systems, root cause efforts; strategize re further Rule 26 discussions; draft, revise correspondence to opposing counsel re same	2.8	\$605.00	\$1,694.00
2/12/2016	Dave	Stein	review class member contacts	0.1	\$605.00	\$60.50
2/16/2016	Dave	Stein	emails with L Kiser, M Troutman re vehicle inspection staffing	0.2	\$605.00	\$121.00
2/16/2016	Dave	Stein	emails with M Troutman re periodic fee reporting to liaison counsel; review reports of same	0.4	\$605.00	\$242.00
2/16/2016	Dave	Stein	review draft notices of dismissal for various plaintiffs; confer with C Corbitt re same; emails with various co-counsel re same; review underlying dockets for same	0.5	\$605.00	\$302.50
2/16/2016	Dave	Stein	confer with D Hughes re discovery correspondence and review revisions to same; further revise and send same to opposing counsel; review L Kiser response to same and strategize re next steps	0.6	\$605.00	\$363.00
2/16/2016	Dave	Stein	review liaison counsel email re pleading fraud by omission in amended complaint and strategize re next steps; emails with liaison counsel re same	0.6	\$605.00	\$363.00
2/16/2016	Dave	Stein	review recent 12b6 orders and briefing for purposes of improving amended complaint	0.8	\$605.00	\$484.00
2/16/2016	Dylan	Hughes	review, edit and discuss discovery related correspondence.	0.4	\$685.00	\$274.00
2/17/2016	Dave	Stein	review bimonthly time and expense reports billed by various co-counsel	0.3	\$605.00	\$181.50
2/17/2016	Dave	Stein	review defense counsel email re ESI protocol, Rule 26 report, and schedule; review ESI protocol; independent research of Honda databases; review Honda revisions to joint Rule 26 report; revise Rule 26 report; begin drafting correspondence to opposing counsel re deficiency in database identification and re edits to Rule 26 report; confer with E Gibbs re same	6.3	\$605.00	\$3,811.50

2/17/2016	Eric	Gibbs	review competing class certification and discovery schedules, c/w D Stein re same	0.6	\$805.00	\$483.00
2/18/2016	Caroline	Corbitt	Return call of class rep Ashley Payan re: her document collection questions.	0.2	\$365.00	\$73.00
2/18/2016	Caroline	Corbitt	Listen and take notes on messages received by CR-V owners with vibration vehicles.	0.2	\$365.00	\$73.00
2/18/2016	Dave	Stein	review underlying dockets for voluntary dismissals of plaintiffs	0.2	\$605.00	\$121.00
2/18/2016	Dave	Stein	Strategize re discovery plan; draft and revise email to opposing counsel and confer with team re same	1.1	\$605.00	\$665.50
2/18/2016	Dave	Stein	review class member contacts and strategize re possible additional state claims in amended complaint	0.2	\$605.00	\$121.00
2/19/2016	Caroline	Corbitt	Call class rep Michael Stanley to return his call. Answer his questions about document collection and headrest replacement.	0.4	\$365.00	\$146.00
2/19/2016	Caroline	Corbitt	Answer call from client Julia Hsi about letter from credit card company.	0.1	\$365.00	\$36.50
2/19/2016	Caroline	Corbitt	Call and email those who have contacted us about their vibrating vehicles.	1.5	\$365.00	\$547.50
2/19/2016	Dave	Stein	Emails with defense, liaison counsel re initial disclosure production, meet confer	0.3	\$605.00	\$181.50
2/21/2016	Caroline	Corbitt	Draft Plaintiffs' initial disclosures.	1.5	\$365.00	\$547.50
2/22/2016	Caroline	Corbitt	Draft stipulation dismissing Honda Motor Corporation	1	\$365.00	\$365.00
2/22/2016	Caroline	Corbitt	Send stipulation dismiss Honda Motor Company to co-counsel for their review.	0.2	\$365.00	\$73.00
2/22/2016	Caroline	Corbitt	Proofread and finalize plaintiffs' initial disclosures. Serve on defense counsel.	0.7	\$365.00	\$255.50
2/22/2016	Dave	Stein	review, revise initial disclosures; confer with team re same	0.8	\$605.00	\$484.00
2/22/2016	Dave	Stein	review correspondence re scope of initial disclosure production; draft and revise emails to defense counsel re same and re meet/confer re amended complaint; confer with team, liaison counsel re same	0.7	\$605.00	\$423.50
2/22/2016	Dave	Stein	prepare correspondence to opposing counsel re ESI protocol and identification of data systems; continue development of discovery plan re same; continue independent research into Honda databases and systems; review Honda's initial disclosures (served today) to inform same	2.2	\$605.00	\$1,331.00
2/22/2016	Geoffrey	Munroe	Call w/ DS re initial disclosures, review disclosures and email re damages section	0.3	\$660.00	\$198.00
2/23/2016	Caroline	Corbitt	Email D. Stein re: co-counsel edits to stipulation.	0.1	\$365.00	\$36.50
2/23/2016	Caroline	Corbitt	Call individuals who contacted us to complain about their vibrating vehicles.	1.2	\$365.00	\$438.00

2/23/2016	Caroline	Corbitt	Answer call from class representative Michelle Bergendahl about contact from Honda corporate.	0.5	\$365.00	\$182.50
2/23/2016	Caroline	Corbitt	Create representation agreement for [REDACTED]. Email him re: contact info and document collection.	0.3	\$365.00	\$109.50
2/23/2016	Dave	Stein	email M McMorrow re research project	0.1	\$605.00	\$60.50
2/23/2016	Dave	Stein	confirm notices of dismissal filed in TN, KY cases	0.1	\$605.00	\$60.50
2/23/2016	Dave	Stein	emails with defense, co-counsel re ESI, Rule 26	0.2	\$605.00	\$121.00
2/24/2016	Caroline	Corbitt	Vetting call with potential class representative [REDACTED].	0.9	\$365.00	\$328.50
2/24/2016	Dave	Stein	prepare for, participate in meet/confer call re amended complaint and re Rule 26 report; confer with team, M Troutman following same; review and revise Rule 26 report and emails with liaison counsel, defense counsel re same	1.6	\$605.00	\$968.00
2/24/2016	Dave	Stein	review recent class member contacts for amended complaint; confer with C Corbitt re following up with same	0.3	\$605.00	\$181.50
2/25/2016	Caroline	Corbitt	Call people who contacted us about their CR-Vs through our website.	0.6	\$365.00	\$219.00
2/25/2016	Dave	Stein	draft, revise joint agenda for upcoming status hearing	0.8	\$605.00	\$484.00
2/25/2016	Dave	Stein	emails with L Kiser re Rule 26 report	0.1	\$605.00	\$60.50
2/25/2016	Dave	Stein	review co-counsel research on viability of nationwide claims in amended complaint; emails with M McMorrow and M Troutman re same; review underlying cases for same	0.9	\$605.00	\$544.50
2/25/2016	Dave	Stein	research potential nationwide certification of Magnusson moss warranty act; review caselaw from around country re same	2.8	\$605.00	\$1,694.00
2/26/2016	Caroline	Corbitt	Draft additional plaintiff fact sections for upcoming amended complaint. Email D. Stein re: class rep status.	1	\$365.00	\$365.00
2/26/2016	Caroline	Corbitt	Email Eugene Turin about NY client.	0.1	\$365.00	\$36.50
2/26/2016	Caroline	Corbitt	Create separate facts section for client review. Email client Robert Fennes about verifying his facts section for the amended complaint.	0.2	\$365.00	\$73.00
2/26/2016	Caroline	Corbitt	Call and email absent class members who have contacted us recently	1.6	\$365.00	\$584.00
2/26/2016	Dave	Stein	emails with co-counsel, defense counsel re joint agenda, rule 26 statement, and status hearing; review Honda edits to both documents	0.4	\$605.00	\$242.00
2/26/2016	Dave	Stein	review co-counsel email and underlying court opinion re fraud by omission claim; response email re same	0.6	\$605.00	\$363.00
2/26/2016	Dave	Stein	provide guidance to C Corbitt re research into state by state unjust enrichment claim	0.1	\$605.00	\$60.50
2/26/2016	Dave	Stein	review and comment on drafts of new plaintiffs' facts sections; confer with C Corbitt re preparing causes of action for same	0.4	\$605.00	\$242.00

2/29/2016	Caroline	Corbitt	Research unjust enrichment case law for all 15 states included in second amended complaint. Plead for states where viable. Email D. Stein memo of research and draft claims.	4.1	\$365.00	\$1,496.50
2/29/2016	Caroline	Corbitt	Email D. Stein in response to his unjust enrichment question. Send additional email highlighting research in memo.	0.3	\$365.00	\$109.50
2/29/2016	Dave	Stein	begin preparing further amended complaint; confer with C Corbitt re plaintiff facts sections, updating clients re same; state-by-state legal research into implied warranty claim	6.4	\$605.00	\$3,872.00
3/1/2016	Caroline	Corbitt	Research NY, FL, and MA UDAP law. Draft plaintiff facts for UDAP violations in NY, FL and MA. Exchange emails with D. Stein about language of claims.	4.2	\$365.00	\$1,533.00
3/1/2016	Caroline	Corbitt	Review clients docs, contact additional clients and attorneys	1.7	\$365.00	\$620.50
3/1/2016	Dave	Stein	review C Corbitt research re unjust enrichment claims; read various automotive and other consumer cases to assess viability of claim; confer with G Munroe re same	3.8	\$605.00	\$2,299.00
3/1/2016	Dave	Stein	continue revising draft second amended complaint; confer with team, liaison counsel re same	2.3	\$605.00	\$1,391.50
3/1/2016	Dave	Stein	email defense counsel re production protocol	0.1	\$605.00	\$60.50
3/1/2016	Geoffrey	Munroe	Call with D Stein re pleading strategy for amended complaint, specifically re unjust enrichment and fraudulent omissions, review case law re same	0.5	\$660.00	\$330.00
3/2/2016	Caroline	Corbitt	Email counsel of named plaintiffs re: document collection.	0.2	\$365.00	\$73.00
3/2/2016	Caroline	Corbitt	Proofread, check consistency and formatting, and make substantive edits to complaint draft of amended complaint. Incorporate edits sent by co-counsel.	4	\$365.00	\$1,460.00
3/2/2016	Caroline	Corbitt	Email client Bakh Inamov re: document collection.	0.1	\$365.00	\$36.50
3/2/2016	Caroline	Corbitt	Email client Julia Hsi about inspection of her vehicle.	0.1	\$365.00	\$36.50
3/2/2016	Caroline	Corbitt	Call people who have contacted the firm expressing interest in the case.	1.3	\$365.00	\$474.50
3/2/2016	Dave	Stein	prepare for monthly status conference and participate in same telephonically	1.3	\$605.00	\$786.50
3/2/2016	Dave	Stein	review protective order entered by court for changes to proposed order	0.2	\$605.00	\$121.00
3/2/2016	Dave	Stein	final review, revision of draft amended complaint; confer with C Corbitt re finalizing same	1.8	\$605.00	\$1,089.00
3/3/2016	Caroline	Corbitt	Final review of amended complaint, incorporating additional edits from co-counsel and D. Stein, and proofread	2.2	\$365.00	\$803.00
3/3/2016	Caroline	Corbitt	Email co-counsel Greg Travalio about signature rule for jury demand.	0.1	\$365.00	\$36.50

3/3/2016	Caroline	Corbitt	Talk to client Julia Hsi about arranging vehicle inspection around her trip to China.	0.2	\$365.00	\$73.00
3/3/2016	Caroline	Corbitt	Email co-counsel re: documents initially produced by Honda.	0.1	\$365.00	\$36.50
3/3/2016	Dave	Stein	emails with liaison counsel re proposed revisions to complaint, finalization of same; review proposed revisions and further revise complaint based on same; confer with C Corbitt re finalizing complaint for filing	1	\$605.00	\$605.00
3/3/2016	Dave	Stein	debriefing from M Troutman re vehicle repairs for client Maticsik	0.2	\$605.00	\$121.00
3/3/2016	Dave	Stein	confer with C Corbitt re client's inspection availability	0.1	\$605.00	\$60.50
3/3/2016	Dylan	Hughes	review and revise second amended complaint.	1.2	\$685.00	\$822.00
3/4/2016	Caroline	Corbitt	Review documents and videos initially produced by Honda and email D. Stein about their contents.	2.4	\$365.00	\$876.00
3/4/2016	Dave	Stein	review Case Management Order No. 4 and Pretrial Order No. 5	0.2	\$605.00	\$121.00
3/7/2016	Caroline	Corbitt	Email D. Stein re: status of collecting named plaintiff documents.	0.1	\$365.00	\$36.50
3/7/2016	Dave	Stein	emails with defense counsel re production protocol, databases; strategize re potential discovery requests related to same	0.4	\$605.00	\$242.00
3/7/2016	Dave	Stein	review non-confidential documents produced by Honda with initial disclosures	0.2	\$605.00	\$121.00
3/7/2016	Dave	Stein	confer with C Corbitt re process of gathering, producing documents with initial disclosures	0.2	\$605.00	\$121.00
3/10/2016	Caroline	Corbitt	Call plaintiff Bakh Inamov about document collection.	0.2	\$365.00	\$73.00
3/10/2016	Caroline	Corbitt	Email co-counsel about document production from their client Patricia Flanigan.	0.1	\$365.00	\$36.50
3/10/2016	Dave	Stein	emails with defense, liaison counsel re form of production protocol; review revisions to same	1.6	\$605.00	\$968.00
3/11/2016	Caroline	Corbitt	Email co-counsel E. Turin about documents of his client Patricia Flanigan.	0.1	\$365.00	\$36.50
3/13/2016	Caroline	Corbitt	Begin drafting discovery requests to propound to Honda.	1.5	\$365.00	\$547.50
3/14/2016	Caroline	Corbitt	Continue drafting discovery requests to propound to Honda. Send to D. Stein for his review.	3.2	\$365.00	\$1,168.00
3/14/2016	Caroline	Corbitt	Proofread, finalize, and serve interrogatories on Honda.	1.5	\$365.00	\$547.50
3/14/2016	Caroline	Corbitt	Confer with D. Stein on plaintiff document collection and send him relevant past correspondence with defense counsel.	0.2	\$365.00	\$73.00
3/14/2016	Dave	Stein	review email from defense counsel re ESI; emails with liaison counsel re same; prepare response to same	0.8	\$605.00	\$484.00

3/14/2016	Dave	Stein	review and revise draft discovery requests; confer with liaison counsel, C Corbitt re same; review their proposed revisions; further revise and finalize for service	2.2	\$605.00	\$1,331.00
3/15/2016	Caroline	Corbitt	Review letter response to our interrogatories sent by Honda's defense counsel. Summarize repair status of our all named plaintiffs in email to co-counsel.	0.5	\$365.00	\$182.50
3/15/2016	Caroline	Corbitt	Review & revise letter to defense counsel	0.1	\$365.00	\$36.50
3/15/2016	Dave	Stein	emails with defense, co-counsel re ESI protocol call and other discovery issues; prepare for and hold call with defense counsel re same; confer with team re same, next steps	0.8	\$605.00	\$484.00
3/15/2016	Dave	Stein	review defendant discovery letter re identification of data systems, other issues; strategize response and draft and revise response; review case cited in defendant's letter; confer with G Munroe re same	1.4	\$605.00	\$847.00
3/15/2016	Geoffrey	Munroe	Discuss case strategy with D Stein	0.5	\$660.00	\$330.00
3/16/2016	Caroline	Corbitt	Review documents received from clients and update D. Stein on document production. Create files of plaintiff vehicle purchase records and vibration related service records for each plaintiff where available.	4.3	\$365.00	\$1,569.50
3/16/2016	Dave	Stein	call with M Troutman re various ongoing discovery issues; review suggested revisions to discovery correspondence and further revise same; review L Kiser response to same and strategize re next steps	1.6	\$605.00	\$968.00
3/16/2016	Dave	Stein	review documents from named plaintiffs for initial disclosure production and confer with C Corbitt re scope of production	0.9	\$605.00	\$544.50
3/17/2016	Caroline	Corbitt	Finish creating individual files for initial disclosure for each plaintiff for whom we have documents. Redact personal information from files.	4.7	\$365.00	\$1,715.50
3/17/2016	Caroline	Corbitt	Email client Bakh Inamov re: purchase records.	0.1	\$365.00	\$36.50
3/17/2016	Caroline	Corbitt	Email co-counsel re: Patricia Flanigan's document collection.	0.1	\$365.00	\$36.50
3/17/2016	Dave	Stein	emails with M Troutman re ESI protocol	0.1	\$605.00	\$60.50
3/17/2016	Dave	Stein	review redactions in initial disclosure production documents; confer with C Corbitt re same and re continued gathering of plaintiffs' documents	0.7	\$605.00	\$423.50
3/18/2016	Caroline	Corbitt	Ascertain requirements for production of plaintiffs' documents according to draft ESI protocol and email D. Stein.	0.3	\$365.00	\$109.50
3/18/2016	Caroline	Corbitt	Email client Bakh Inamov re: document he emailed.	0.1	\$365.00	\$36.50
3/18/2016	Dave	Stein	review defendant's further changes to proposed ESI protocol; confer with liaison counsel; emails with defense counsel re same	0.7	\$605.00	\$423.50
3/18/2016	Dave	Stein	oversee C Corbitt's review, preparation of documents for production	0.3	\$605.00	\$181.50
3/21/2016	Caroline	Corbitt	Confer with D. Stein on format of initial plaintiff document production.	0.1	\$365.00	\$36.50

3/21/2016	Caroline	Corbitt	Answer call about status of case from class rep Michael Stanley.	0.3	\$365.00	\$109.50
3/21/2016	Dave	Stein	confer with C Corbitt re initial disclosure production	0.2	\$605.00	\$121.00
3/21/2016	Dave	Stein	draft, revise response email to L Kiser re Attachment A to production protocol; review underlying document for same along with online vendors' deduplication reports	0.8	\$605.00	\$484.00
3/21/2016	Eric	Gibbs	c/w Mike Donovan re new filing	0.4	\$805.00	\$322.00
3/22/2016	Caroline	Corbitt	Review documents sent by named plaintiff Patricia Flanigan. Email her attorney on receiving adequate copies. Draft a letter to enclose with envelope for her additional documents.	0.9	\$365.00	\$328.50
3/22/2016	Caroline	Corbitt	Email named plaintiff Patricia Flanigan's counsel re: her document production and ask for letter. Call and email named plaintiff Bakh Inamov re: his vehicle purchase record. Review and redact responsive documents of B. Inamov and P. Flanigan for production to Honda.	2	\$365.00	\$730.00
3/22/2016	Dave	Stein	emails with M Troutman re production of plaintiff documents	0.1	\$605.00	\$60.50
3/22/2016	Dave	Stein	review documents of class reps before production; confer with C Corbitt re same and re ongoing collection of documents	0.7	\$605.00	\$423.50
3/23/2016	Caroline	Corbitt	Review draft letter sent by co-counsel Eugene Turin.	0.1	\$365.00	\$36.50
3/23/2016	Caroline	Corbitt	Draft letter accompanying Plaintiffs' initial document production to Honda and sent to D. Stein for his review. Revise according to his edits. Serve document production to co- and defense counsel.	2.1	\$365.00	\$766.50
3/23/2016	Dave	Stein	review L Kiser email re production protocol document; draft, revise response to same	0.8	\$605.00	\$484.00
3/24/2016	Dave	Stein	review defense counsel email re production protocol disagreement; confer with team re same; draft and revise response to same; research various vendors' deduplication processes and review court order re ESI protocol	1.1	\$605.00	\$665.50
3/29/2016	Caroline	Corbitt	Leave voicemail for class rep Julia Hsi in advance of her trip to China.	0.1	\$365.00	\$36.50
3/29/2016	Dave	Stein	email L Kiser re ESI protocol information	0.1	\$605.00	\$60.50
3/30/2016	Caroline	Corbitt	Answer call from class rep Michelle Bergendahl re: status of the case.	0.2	\$365.00	\$73.00
3/31/2016	Dave	Stein	Email defense counsel re esi protocol	0.1	\$605.00	\$60.50
4/1/2016	Dave	Stein	review L Kiser email re ESI protocol, document production, etc.	0.3	\$605.00	\$181.50
4/4/2016	Dave	Stein	review sedona conference principles on ESI in context of discussions re deduplication metadata; continue to strategize re next steps; draft further response to L Kiser; emails with M Troutman re same	1.1	\$605.00	\$665.50
4/5/2016	Caroline	Corbitt	Call defense counsel Simone Jones in response to her question about document production and email D. Stein re: call.	0.3	\$365.00	\$109.50
4/5/2016	Caroline	Corbitt	Email class rep Tom Prychitko re: his purchase records.	0.1	\$365.00	\$36.50

4/5/2016	Caroline	Corbitt	Email co-counsel link to plaintiffs' initial document production.	0.1	\$365.00	\$36.50
4/5/2016	Caroline	Corbitt	Answer call from individual interested in learning more about the case.	0.2	\$365.00	\$73.00
4/5/2016	Dave	Stein	confer with M Troutman re ESI protocol, discovery, other next steps	0.6	\$605.00	\$363.00
4/5/2016	Dave	Stein	review, revise correspondence re ESI protocol and confer with M Troutman re same	0.1	\$605.00	\$60.50
4/5/2016	Dave	Stein	review class member contacts; confer with M Troutman, C Corbitt re vetting potential additional class representatives	0.2	\$605.00	\$121.00
4/5/2016	Dave	Stein	draft, revise joint agenda; confer with M Troutman re same; review EDNY filing, docket for same; review prior case management order for same; emails with L Kiser re revisions to same and review her revisions; review interrogatories and tolling agreement to assess defendant claims re service of interrogatories	1.2	\$605.00	\$726.00
4/6/2016	Caroline	Corbitt	Access and begin review of document production of defendants.	0.2	\$365.00	\$73.00
4/6/2016	Dave	Stein	review defense counsel correspondence re joint agenda, request for VIN numbers; review multiple rounds of joint agenda edits; confer with M Troutman re same	0.9	\$605.00	\$544.50
4/7/2016	Caroline	Corbitt	Call with co-counsel M. Troutman and individual interested in learning more about the case.	0.6	\$365.00	\$219.00
4/7/2016	Dave	Stein	review documents produced by Honda; strategize re next steps, including consultation with automotive expert; confer with team re same	2.8	\$605.00	\$1,694.00
4/8/2016	Caroline	Corbitt	Create spreadsheet of all named plaintiff unredacted VINs. Get approval from D. Stein then send to defense counsel.	1.2	\$365.00	\$438.00
4/8/2016	Caroline	Corbitt	Email D. Stein re: potential email to defense counsel	0.1	\$365.00	\$36.50
4/8/2016	Caroline	Corbitt	Confer with automotive consultant re executing protective order and reviewing case documents	0.2	\$365.00	\$73.00
4/8/2016	Caroline	Corbitt	Make edits to case webpage and email to K. Boffi for uploading.	0.3	\$365.00	\$109.50
4/8/2016	Dave	Stein	prepare for status hearing; review joint agenda, prior court order, recent discovery served, and ESI protocol for same; participate in status hearing; follow-up call with M Troutman, Greg T, to discuss next steps; confer with team re same	1.5	\$605.00	\$907.50
4/8/2016	Dave	Stein	review emails from co- and opposing counsel re additional document and information productions	0.2	\$605.00	\$121.00
4/8/2016	Dave	Stein	review list of VIN to be produced to Honda; confer with C Corbitt re same	0.1	\$605.00	\$60.50
4/11/2016	Caroline	Corbitt	Email defense counsel re: their document request.	0.1	\$365.00	\$36.50
4/11/2016	Dave	Stein	review email from TN co counsel re dismissal of TN action and strategize re next steps	0.2	\$605.00	\$121.00

4/11/2016	Dave	Stein	review discovery correspondence from defense counsel	0.1	\$605.00	\$60.50
4/13/2016	Caroline	Corbitt	Compile documents for automotive consultant	0.2	\$365.00	\$73.00
4/13/2016	Caroline	Corbitt	Email client Julia Hsi re: her vehicle purchase agreement.	0.2	\$365.00	\$73.00
4/13/2016	Dave	Stein	emails with defense counsel re extension to respond to discovery, response to letter	0.2	\$605.00	\$121.00
4/13/2016	Dave	Stein	emails with M Troutman re research into compelling arbitration based on purchase agreement language	0.3	\$605.00	\$181.50
4/14/2016	Caroline	Corbitt	Email class rep Tom Prychitko re: vehicle purchase agreement. Email his attorney Eugene Turin.	0.2	\$365.00	\$73.00
4/14/2016	Caroline	Corbitt	Write notice of voluntary dismissal for related case Greenstone and send to D. Stein.	0.2	\$365.00	\$73.00
4/14/2016	Caroline	Corbitt	Email class rep Julia Hsi re: China trip and purchase agreement.	0.1	\$365.00	\$36.50
4/14/2016	Dave	Stein	strategize re production of plaintiff documents; confer with M Troutman re same; review L Kiser correspondence re same	0.4	\$605.00	\$242.00
4/15/2016	Caroline	Corbitt	Email class representatives to update them on the case.	0.3	\$365.00	\$109.50
4/15/2016	Caroline	Corbitt	Email class rep Tom Prychitko re: his purchase agreement.	0.1	\$365.00	\$36.50
4/15/2016	Caroline	Corbitt	Review Plaintiffs' new document production for redactions and email link to production to defense counsel.	0.8	\$365.00	\$292.00
4/15/2016	Dave	Stein	continue review of documents produced by Honda and strategize re additional needs	1.2	\$605.00	\$726.00
4/15/2016	Dave	Stein	review draft notice of voluntary dismissal; emails with E Wallis re same	0.2	\$605.00	\$121.00
4/15/2016	Dave	Stein	review time, expense reports from co-counsel	0.3	\$605.00	\$181.50
4/15/2016	Dave	Stein	review M Troutman arbitration memo; review underlying caselaw; confer with M Troutman re next steps	1.3	\$605.00	\$786.50
4/18/2016	Caroline	Corbitt	Redact and Bates stamp complete vehicle purchase agreement of class rep Tom Prychitko. Email to defense counsel.	0.4	\$365.00	\$146.00
4/18/2016	Caroline	Corbitt	Email class rep Tom Prychitko in response to his message sending missing page of vehicle purchase agreement.	0.1	\$365.00	\$36.50
4/18/2016	Caroline	Corbitt	Email automotive consultant re availability for a meeting.	0.1	\$365.00	\$36.50
4/18/2016	Caroline	Corbitt	Email class rep Robert Nonni in response to his message.	0.1	\$365.00	\$36.50
4/18/2016	Caroline	Corbitt	Begin reviewing doc production	1.5	\$365.00	\$547.50
4/18/2016	Caroline	Corbitt	Review motion for leave to file exhibits manually filed by American Honda and email D. Stein and E. Gibbs.	0.1	\$365.00	\$36.50
4/18/2016	Caroline	Corbitt	Review MTD certain counts submitted by American Honda. Circulate and summarize.	0.2	\$365.00	\$73.00
4/18/2016	Caroline	Corbitt	Email individual who contacted us about the case.	0.1	\$365.00	\$36.50

4/18/2016	Dylan	Hughes	Review technical documents produced by Honda to help assess severity of problem, efficacy of fix, strategy going forward	3.8	\$685.00	\$2,603.00
4/20/2016	Caroline	Corbitt	Email D. Stein re: vehicle photos from plaintiff Bakh Inamov.	0.1	\$365.00	\$36.50
4/20/2016	Caroline	Corbitt	Confer with D. Stein and D. Hughes on Inamov document production. Research name of procedure for listing manufacturer's suggested retail price on new vehicles.	0.8	\$365.00	\$292.00
4/20/2016	Dave	Stein	review correspondence from L Kiser re model purchased by plaintiff Inamov; draft, revise response to same; confer with D Hughes re same; review documents produced to defendant re same; review Honda and third party websites for VIN look-ups for same	1.3	\$605.00	\$786.50
4/20/2016	Dave	Stein	prepare for and participate in call with automotive consultant to discuss document production, discovery needs; confer with team re same	2.3	\$605.00	\$1,391.50
4/20/2016	Dylan	Hughes	call with auto consultant re: technical aspects of Honda's document production; confer with D Stein	2.3	\$685.00	\$1,575.50
4/20/2016	Dylan	Hughes	Confer with D. Stein on Inamov document production. Research procedure for listing manufacturer's suggested retail price on new vehicles.	0.8	\$685.00	\$548.00
4/21/2016	Dave	Stein	review co-counsel suggested revisions to correspondence to L Kiser re Inamov model; further revise correspondence; review L Kiser response to same; confer with M Troutman re further response to same	0.9	\$605.00	\$544.50
4/22/2016	Caroline	Corbitt	Draft email update for individuals who have contacted us through our website and send to D. Stein.	0.8	\$365.00	\$292.00
4/22/2016	Dave	Stein	continue review of documents produced by Honda and strategizing re additional information to request	1.5	\$605.00	\$907.50
4/22/2016	Dave	Stein	review and revise mass email to class members updating them on litigation	0.2	\$605.00	\$121.00
4/25/2016	Dave	Stein	continue strategizing and reviewing documents for ideas of additional informational needs	0.5	\$605.00	\$302.50
4/25/2016	Dave	Stein	review recent class member contacts re repair efficacy	0.2	\$605.00	\$121.00
4/25/2016	Dave	Stein	strategize re 12b6 opposition brief; email with M Troutman re same	0.4	\$605.00	\$242.00
4/26/2016	Caroline	Corbitt	Revise email update to consumers who have contacted us for more info about the case and send to D. Stein.	0.3	\$365.00	\$109.50
4/26/2016	Dave	Stein	Prepare for and participate in call with potential expert	0.7	\$605.00	\$423.50
4/27/2016	Caroline	Corbitt	Examine metadata within Honda's document productions and email D. Stein.	0.2	\$365.00	\$73.00
4/27/2016	Caroline	Corbitt	Examine docket of related CR-V case Kogan v. American Honda and email D. Stein.	0.2	\$365.00	\$73.00

4/27/2016	Dave	Stein	strategize re additional documents needed from Honda before earnest settlement discussions can take place; begin outlining letter to Honda re same; confer with M Troutman re same; review prior correspondence and joint agenda re same; draft and revise letter	1.9	\$605.00	\$1,149.50
4/27/2016	Dave	Stein	draft, revise joint agenda for May 2 status conference; review past agenda, court order for same; confer with co-counsel re same	0.6	\$605.00	\$363.00
4/27/2016	Dave	Stein	strategize re outline of factual section of 12b6 opposition brief; prepare for and participate in call with M Troutman to discuss same; review Honda brief, underlying documents for same	1.2	\$605.00	\$726.00
4/27/2016	Dave	Stein	confer with M Troutman re local rules, standing orders on seeking additional pages for 12b6 opposition; review same	0.2	\$605.00	\$121.00
4/28/2016	Dave	Stein	emails with defense counsel re joint agenda; review defense edits; confer with M Troutman re same	0.4	\$605.00	\$242.00
4/29/2016	Caroline	Corbitt	Respond to D. Stein comment on mass email update to consumers for case.	0.1	\$365.00	\$36.50
4/29/2016	Dave	Stein	emails with defense counsel re meet/confer re interrogatories	0.1	\$605.00	\$60.50
5/2/2016	Caroline	Corbitt	Do final proofread of email update to consumers who have contacted us about the case and send for mass emailing.	0.4	\$365.00	\$146.00
5/2/2016	Caroline	Corbitt	Call and email individual who contacted asking about the status of the case.	0.2	\$365.00	\$73.00
5/2/2016	Dave	Stein	prepare for monthly status conference; emails with co- and opposing counsel re dial-in information; participate in conference	1.6	\$605.00	\$968.00
5/3/2016	Dave	Stein	Emails with M Troutman re conflict on date of next status conference and re retention of consultant for inspections	0.2	\$605.00	\$121.00
5/4/2016	Caroline	Corbitt	Respond by emails sent by our website contacts responding to mass update sent yesterday.	0.8	\$365.00	\$292.00
5/4/2016	Dave	Stein	Prepare for meet/confer call with Honda re interrogatories and re follow up requests for documents; confer with M Troutman re same	1.4	\$605.00	\$847.00
5/5/2016	Caroline	Corbitt	Answer call from individual interested in learning more about the case.	0.2	\$365.00	\$73.00
5/6/2016	Caroline	Corbitt	Email with potential expert re protective order etc.	0.2	\$365.00	\$73.00
5/10/2016	Caroline	Corbitt	Email expert to reschedule call.	0.1	\$365.00	\$36.50
5/10/2016	Caroline	Corbitt	Review notes of call with potential client and email summary to D. Stein.	0.1	\$365.00	\$36.50
5/10/2016	Caroline	Corbitt	Review interrogatory responses and new document produced by Honda.	0.3	\$365.00	\$109.50
5/10/2016	Clay	Stockton	Prepare to draft opposition to motion to dismiss by reading and annotating the operative complaint.	1.9	\$400.00	\$760.00

5/10/2016	Clay	Stockton	Prepare to draft opposition to motion to dismiss by reading and annotating the motion.	1	\$400.00	\$400.00
5/10/2016	Clay	Stockton	Conduct legal research regarding Strama case relied upon by Defendant.	0.4	\$400.00	\$160.00
5/10/2016	Clay	Stockton	Review applicable local rules, including introductory statement on civility, and standing orders of presiding judge.	0.4	\$400.00	\$160.00
5/10/2016	Dave	Stein	review notes from meet/confer call with Honda last week re follow-up discovery requests; draft and revise email memorializing call; confer with M Troutman re same; follow up emails with L Kiser re same	0.8	\$605.00	\$484.00
5/10/2016	Dave	Stein	confer with C Corbitt, M Troutman re class member contacts, repair issues	0.3	\$605.00	\$181.50
5/10/2016	Dave	Stein	review recently produced document re updated warranty numbers; confer with team re same	0.4	\$605.00	\$242.00
5/10/2016	Dave	Stein	review Honda objections/responses to first set of interrogatories; evaluate potential motion to compel; legal research into proportionality objections in sixth circuit; review court standing orders, local rules re discovery disputes; review advisory committee notes to rule 26 re proportionality for same; confer with team, liaison counsel re same; begin outlining correspondence to defendant re same	3.2	\$605.00	\$1,936.00
5/11/2016	Caroline	Corbitt	Call with expert re: documents produced by Honda.	1	\$365.00	\$365.00
5/11/2016	Clay	Stockton	Review legal research of co-counsel regarding fraud by omission claims in preparation for drafting opposition to motion to dismiss.	0.2	\$400.00	\$80.00
5/11/2016	Clay	Stockton	Strategize with D. Stein concerning factual and legal issues in opposition to motion to dismiss.	1	\$400.00	\$400.00
5/11/2016	Dave	Stein	prepare for, participate in call with automotive consultant re documents produced, additional information needed, inspection protocol; confer with team re same, next steps	1.3	\$605.00	\$786.50
5/11/2016	Dave	Stein	strategize re 12b6 opposition; prepare for and meet with C Stockton to discuss research, drafting of 12b6 opposition; email co-counsel M McMorrow re research into secret warranty claim	1.4	\$605.00	\$847.00
5/11/2016	Dylan	Hughes	Assist in call with auto consultant	1.3	\$685.00	\$890.50
5/12/2016	Clay	Stockton	Outline arguments for opposition to motion to dismiss.	2.8	\$400.00	\$1,120.00
5/12/2016	Clay	Stockton	Research case law for opposition to motion to dismiss.	1.2	\$400.00	\$480.00
5/13/2016	Clay	Stockton	Outline arguments for opposition to motion to dismiss.	0.9	\$400.00	\$360.00
5/13/2016	Clay	Stockton	Research case law and Honda documents in preparation for drafting opposition to motion to dismiss.	1.6	\$400.00	\$640.00
5/13/2016	Dave	Stein	email L Kiser re request for follow up info on discovery	0.1	\$605.00	\$60.50

5/13/2016	Dave	Stein	emails, call with M McMorrow re secret warranty research in response to 12b6 motion	0.2	\$605.00	\$121.00
5/15/2016	Clay	Stockton	Legal research regarding Sixth Circuit ripeness and standing doctrines, in support of opposition to motion to dismiss.	0.6	\$400.00	\$240.00
5/16/2016	Caroline	Corbitt	Review new documents produced by Honda last week and response to our interrogatories. Email D. Stein and D. Hughes re: same.	0.7	\$365.00	\$255.50
5/16/2016	Clay	Stockton	Research Sixth Circuit ripeness and standing doctrines in support of opposition to motion to dismiss.	0.9	\$400.00	\$360.00
5/16/2016	Dave	Stein	review HMC responses/objections to interrogatories; strategize re possible motion to compel; work with S Lopez on correspondence to defense counsel	0.7	\$605.00	\$423.50
5/17/2016	Clay	Stockton	Begin drafting opposition to motion to dismiss.	4.6	\$400.00	\$1,840.00
5/18/2016	Clay	Stockton	Continue drafting opposition to motion to dismiss and confer with D. Stein regarding same.	8	\$400.00	\$3,200.00
5/18/2016	Dave	Stein	review further information provided by defendant in response to follow-up request on discovery; strategize re next steps; begin drafting further discovery correspondence	0.5	\$605.00	\$302.50
5/19/2016	Clay	Stockton	Continue drafting opposition to motion to dismiss and confer with D. Stein regarding same.	6.1	\$400.00	\$2,440.00
5/19/2016	Dave	Stein	continue review of produced documents, defense counsel's letters, and drafting of discovery correspondence re same; confer with team, co-counsel re same	0.9	\$605.00	\$544.50
5/19/2016	Dave	Stein	review co-counsel memo re: judicial notice, strategy in opposition papers; confer with co-counsel re same	0.5	\$605.00	\$302.50
5/19/2016	Dave	Stein	review recent class member contacts to assess efficacy of repairs, etc.	0.4	\$605.00	\$242.00
5/19/2016	Steve	Lopez	Draft correspondence concerning discovery requests; review responses to discovery requests and produced documents re same	2.3	\$415.00	\$954.50
5/20/2016	Clay	Stockton	Continue drafting opposition to motion to dismiss and confer with D. Stein regarding same.	7.2	\$400.00	\$2,880.00
5/20/2016	Dave	Stein	confer with M Troutman re follow up discovery requests to Honda	0.1	\$605.00	\$60.50
5/20/2016	Dave	Stein	review secret warranty research, draft from M McMorrow; emails with M McMorrow re same; further review of underlying caselaw and research Honda taking the position that design defects are not covered by its warranty; confer with C Stockton	1.3	\$605.00	\$786.50
5/20/2016	Dave	Stein	review recent caselaw re fraudulent omissions; confer with C Stockton re applicability to 12b6 opposition	0.7	\$605.00	\$423.50

5/20/2016	Dave	Stein	review recent class member contacts for experiences with vibration, repair procedures	0.4	\$605.00	\$242.00
5/23/2016	Clay	Stockton	Finish first draft of opposition to motion to dismiss and confer with D. Stein regarding same.	1.2	\$400.00	\$480.00
5/23/2016	Clay	Stockton	Begin editing opposition to motion to dismiss and discuss same with D. Stein	3.6	\$400.00	\$1,440.00
5/23/2016	Dave	Stein	call with M Troutman to discuss discovery motion strategies/procedures and fraud by omission section of opposition brief; email with M Troutman re adjusting scheduled status conference; confer with S Lopez re same	0.4	\$605.00	\$242.00
5/23/2016	Dave	Stein	work with C Stockton on organization, arguments in motion to dismiss opposition brief; review co-counsel's draft facts section and strategize re possible revisions to same	0.7	\$605.00	\$423.50
5/24/2016	Clay	Stockton	Continue editing opposition to motion to dismiss and discuss same with D. Stein.	3.4	\$400.00	\$1,360.00
5/24/2016	Dave	Stein	review email from M Troutman re rescheduled status conference	0.1	\$605.00	\$60.50
5/24/2016	Dave	Stein	review/revise discovery correspondence re Honda's rog responses; review the stipulated ESI protocol, ND Ohio order, and prior discovery correspondence for same; confer with S Lopez re same	2.1	\$605.00	\$1,270.50
5/25/2016	Caroline	Corbitt	Leave message for class member Robert Fennes.	0.1	\$365.00	\$36.50
5/25/2016	Caroline	Corbitt	Call with client Bob Nonni to update him on the case.	0.3	\$365.00	\$109.50
5/25/2016	Caroline	Corbitt	Respond to D. Stein re: due date of joint status agenda.	0.1	\$365.00	\$36.50
5/25/2016	Caroline	Corbitt	Call with Michelle Bergendahl updating her on status of the case.	0.2	\$365.00	\$73.00
5/25/2016	Caroline	Corbitt	Leave message with plaintiff Emily Vellano.	0.1	\$365.00	\$36.50
5/25/2016	Caroline	Corbitt	Call plaintiff Ashley Payan to update her on status of the case.	0.2	\$365.00	\$73.00
5/25/2016	Caroline	Corbitt	Call plaintiff Bakh Inamov to update him on status of the case.	0.2	\$365.00	\$73.00
5/25/2016	Dave	Stein	email opposing counsel re outstanding discovery issues	0.1	\$605.00	\$60.50
5/25/2016	Dave	Stein	review recent class member contacts; call with a class member re same	1.2	\$605.00	\$726.00
5/26/2016	Caroline	Corbitt	Answer call from plaintiff Robert Fennes. Update him on status of the case.	0.2	\$365.00	\$73.00
5/26/2016	Caroline	Corbitt	Call plaintiff Michael Stanley and update him on status of the case.	0.3	\$365.00	\$109.50
5/26/2016	Clay	Stockton	Incorporate work product of liaison counsel into draft brief opposing motion to dismiss.	0.9	\$400.00	\$360.00
5/26/2016	Dave	Stein	review co-counsel edits to discovery letter; final review, revision of same for sending; emails with co- and defense counsel re same	0.5	\$605.00	\$302.50

5/26/2016	Dave	Stein	review and provide structural/organizational feedback to C Stockton of 12b6 opposition brief; review underlying caselaw and statutory language for same	4.6	\$605.00	\$2,783.00
5/27/2016	Dave	Stein	Review and revise opposition brief and confer with team re same	3.4	\$605.00	\$2,057.00
5/29/2016	Dave	Stein	review, revise opposition brief; review various sixth circuit cases on justiciability; research accrual of various UDAP claims for same; confer with G Munroe re briefing organization and strategy	6.3	\$605.00	\$3,811.50
5/30/2016	Geoffrey	Munroe	Confer with DS to discuss status of MTD briefing, initial impressions and plan for revising	0.7	\$660.00	\$462.00
5/31/2016	Caroline	Corbitt	Draft demand letter to Honda on behalf of Plaintiffs Robert Fennes and [REDACTED]. Send to D. Stein.	0.3	\$365.00	\$109.50
5/31/2016	Caroline	Corbitt	Call plaintiff Emily Vellano to update her on status of case and remind of preservation obligations.	0.2	\$365.00	\$73.00
5/31/2016	Clay	Stockton	Research additional case law for opposition to motion to dismiss and communicate with D. Stein regarding same.	3.2	\$400.00	\$1,280.00
5/31/2016	Dave	Stein	emails with M Troutman re joint agenda due tomorrow; review and revise draft agenda; confer with M Troutman, re litigation strategy going forward	0.7	\$605.00	\$423.50
5/31/2016	Dave	Stein	review Honda's discovery correspondence re interrogatories; confer with team, M Troutman re same; draft and revise response to same	1.3	\$605.00	\$786.50
5/31/2016	Dave	Stein	continue review/revision of 12b6 opposition brief; confer with G Munroe, C Stockton re same; continued legal research including into statutory language in California secret warranty statute, case interpreting the statute cited by Honda, and the ripeness doctrine	8.7	\$605.00	\$5,263.50
5/31/2016	Geoffrey	Munroe	Revise MTD brief, calls and emails with DS re same	8.6	\$660.00	\$5,676.00
6/1/2016	Caroline	Corbitt	Email co-counsel Mark Troutman in response to his message about CR-V owner to interview.	0.1	\$365.00	\$36.50
6/1/2016	Caroline	Corbitt	Email attorney of plaintiff Patricia Flanigan in response to his question.	0.1	\$365.00	\$36.50
6/1/2016	Clay	Stockton	Review and comment on draft motion for leave to file under seal with D. Stein.	0.1	\$400.00	\$40.00
6/1/2016	Dave	Stein	work with liaison counsel re procedures for filing documents under seal; review/revise draft motion to seal; review local rules, protective order re same	0.7	\$605.00	\$423.50
6/1/2016	Dave	Stein	confer with G Munroe, C Stockton re revisions to opposition brief; review revisions and comments to same and further revise same; emails with liaison counsel re brief	5.5	\$605.00	\$3,327.50
6/1/2016	Eric	Gibbs	review and provide minor suggestions re 12b response	0.6	\$805.00	\$483.00

6/1/2016	Jason	Gibbs	respond to inquiries re status of case, update firm data base	0.8	\$190.00	\$152.00
6/2/2016	Caroline	Corbitt	Email D. Stein re: interrogatories served by Honda.	0.1	\$365.00	\$36.50
6/2/2016	Caroline	Corbitt	Email D. Stein re: request of counsel in MDL to dismiss his case. Ascertain status of case in Northern District of TN docket and email D. Stein re: same.	0.3	\$365.00	\$109.50
6/2/2016	Caroline	Corbitt	Draft notice of voluntary dismissal for case of plaintiffs Margaret and Tony Ward in MDL action. Email to their attorney to confirm his authorization to file.	0.4	\$365.00	\$146.00
6/2/2016	Caroline	Corbitt	Email plaintiffs re motion to compel arbitration.	0.2	\$365.00	\$73.00
6/2/2016	Clay	Stockton	Finalize opposition to motion to dismiss by incorporating internal edits and those from co-counsel, and communicate with D. Stein regarding same.	5.2	\$400.00	\$2,080.00
6/2/2016	Clay	Stockton	Research filing rules applicable to opposition brief and related declaration and exhibits, and oversee filing.	1.7	\$400.00	\$680.00
6/2/2016	Dave	Stein	prepare for tomorrow's status hearing; confer with liaison counsel re same	0.7	\$605.00	\$423.50
6/2/2016	Dave	Stein	review, revise draft declaration to accompany opposition to motion to dismiss; confer with C Stockton re same; review exhibits to same	0.4	\$605.00	\$242.00
6/2/2016	Dave	Stein	review co-counsel edits to 12b6 opposition brief; further revise same; confer with co-counsel, team re same	2.3	\$605.00	\$1,391.50
6/2/2016	Dave	Stein	confer with M Troutman re request by Honda to exceed page limit on arbitration motion	0.2	\$605.00	\$121.00
6/3/2016	Caroline	Corbitt	Review vehicle inspection draft protocol sent by defense counsel. Email Eugene Turin and Mike McMorrow re: scheduling inspections of their clients' vehicles.	0.5	\$365.00	\$182.50
6/3/2016	Dave	Stein	Prepare for and participate in status hearing with court	0.6	\$605.00	\$363.00
6/3/2016	Dave	Stein	emails with defense counsel re inspection protocol, meet/confer; preliminary review of protocol and confer with S Lopez re same; strategize re meet/confer	0.9	\$605.00	\$544.50
6/3/2016	Dylan	Hughes	assist in review/negotiation points for inspection protocol	2.9	\$685.00	\$1,986.50
6/3/2016	Steve	Lopez	Draft summary email to Dave Stein concerning status of ten pending discovery items including complaint data, NASQ reports, CRV changes, and the number of warranty complaints for 2016 model, as well as Honda's responses concerning each	2.9	\$415.00	\$1,203.50
6/6/2016	Caroline	Corbitt	Ascertain due date of ROGS and RPDs served on plaintiffs by American Honda.	0.1	\$365.00	\$36.50

6/6/2016	Caroline	Corbitt	Call with individual interested in learning more about the case and giving an affidavit. Confer with co-counsel Mark Troutman re: same.	0.6	\$365.00	\$219.00
6/6/2016	Dave	Stein	emails with M Troutman re meet/confer call; prepare for same, including by reviewing various emails and letters on the subject from the past few months; confer with D Hughes, S Lopez re same; participate in call; confer with M Troutman, team afterward re follow up correspondence, next steps in discovery	2.1	\$605.00	\$1,270.50
6/6/2016	Steve	Lopez	Prepare for meet and confer call with D. Stein; participate in call	1.7	\$415.00	\$705.50
6/6/2016	Steve	Lopez	Draft confirmatory email to defense counsel concerning meet and confer call; receive revisions from D. Stein and implement; circulate to co-counsel	1.7	\$415.00	\$705.50
6/7/2016	Dave	Stein	review/revise discovery correspondence to L Kiser; confer with S Lopez re same and re next steps in discovery; strategize re same; review/revise correspondence re informal discovery efforts; confer with team re same	2.1	\$605.00	\$1,270.50
6/7/2016	Dave	Stein	review court order following status conference	0.2	\$605.00	\$121.00
6/8/2016	Caroline	Corbitt	Begin reviewing and planning responses and production on ROGS/RPDs served on plaintiffs by American Honda.	1.7	\$365.00	\$620.50
6/8/2016	Caroline	Corbitt	Email expert re: schedule for class rep vehicle inspections.	0.1	\$365.00	\$36.50
6/8/2016	Dave	Stein	emails with M Troutman re ongoing discovery efforts; confer with S Lopez re same; review M Troutman edits to interrogatory discovery correspondence; further revise same	0.9	\$605.00	\$544.50
6/8/2016	Dave	Stein	review recent standing/UDAP decision for potential applicability in 12b6 briefing	0.6	\$605.00	\$363.00
6/8/2016	Dave	Stein	Work with team to continue discovery efforts and strategize re next steps; further review/revise correspondence re informal discovery; review/revise inspection protocol relating to same; emails with M Troutman, automotive consultant re same	2.7	\$605.00	\$1,633.50
6/9/2016	AJ	De Bartolomeo	Confer with team re defensive discovery strategy and plan same	0.3	\$740.00	\$222.00
6/9/2016	Caroline	Corbitt	Email team re: scheduling vehicle inspections. Email expert Bill Williams re: same.	0.2	\$365.00	\$73.00
6/9/2016	Caroline	Corbitt	Email plaintiffs' counsel Eugene Turin re: vehicle inspections. Review details of vehicle inspection protocol in preparation for calls with plaintiffs.	0.5	\$365.00	\$182.50
6/9/2016	Caroline	Corbitt	Leave voicemail for attorney of class reps Eugene Turin re: vehicle inspections.	0.1	\$365.00	\$36.50

6/9/2016	Caroline	Corbitt	Call expert to assess his availability for plaintiff vehicle inspections.	0.2	\$365.00	\$73.00
6/9/2016	Caroline	Corbitt	Review court's case management order and associated deadlines.	0.1	\$365.00	\$36.50
6/9/2016	Caroline	Corbitt	Confer with team re: logistics for plaintiff vehicle inspections.	0.2	\$365.00	\$73.00
6/9/2016	Caroline	Corbitt	Reply to D. Stein email about discovery requests served by American Honda.	0.1	\$365.00	\$36.50
6/9/2016	Dave	Stein	review time, expense info for liaison counsel; emails with M Troutman re same	0.3	\$605.00	\$181.50
6/9/2016	Dave	Stein	review M Troutman comments re inspection protocol; strategize re further revising same; emails with M Troutman, automotive consultant re same; work with team to finalize and to communicate with clients re same	1.4	\$605.00	\$847.00
6/9/2016	Dave	Stein	emails with L Kiser re various discovery issues, vehicle inspections	0.2	\$605.00	\$121.00
6/9/2016	Dave	Stein	work with C Corbitt, AJ DeBartolomeo to begin process of responding to discovery requests	0.6	\$605.00	\$363.00
6/9/2016	Steve	Lopez	Make further edits to inspection protocol	0.4	\$415.00	\$166.00
6/10/2016	Caroline	Corbitt	Call with Melissa Cushing and John Maticcik to describe vehicle inspection protocol and ascertain their schedules for inspections.	0.4	\$365.00	\$146.00
6/10/2016	Caroline	Corbitt	Write draft emailing to Honda detailing clients' availability for vehicle inspections.	0.3	\$365.00	\$109.50
6/10/2016	Caroline	Corbitt	Ascertain hours of dealerships for plaintiff inspections and email to D. Stein.	0.2	\$365.00	\$73.00
6/10/2016	Caroline	Corbitt	Call Eugene Turin re: setting up calls with his clients.	0.1	\$365.00	\$36.50
6/10/2016	Dave	Stein	continue to work with S Lopez re revisions to inspection protocol; work with C Corbitt to coordinate inspections with clients, consultants; revise and send correspondence to L Kiser re same	1.3	\$605.00	\$786.50
6/10/2016	Dave	Stein	begin outlining, preparing discovery; draft and revise 30(b)(6) deposition notice; confer with team re same; review underlying documents for same	1.9	\$605.00	\$1,149.50
6/10/2016	Steve	Lopez	Discuss change to inspection protocol with D. Stein and suggest language	0.3	\$415.00	\$124.50
6/13/2016	Caroline	Corbitt	Email plaintiff John Maticcik re: his availability for a call.	0.1	\$365.00	\$36.50
6/13/2016	Caroline	Corbitt	Email plaintiff Melissa Cushing re: her availability for a call.	0.1	\$365.00	\$36.50
6/13/2016	Caroline	Corbitt	Email plaintiffs' counsel Eugene Turin re: call to go over discovery responses.	0.1	\$365.00	\$36.50
6/13/2016	Dave	Stein	emails with defense counsel, liaison counsel re inspection protocol	0.3	\$605.00	\$181.50
6/14/2016	AJ	De Bartolomeo	Review and consideration of the operative complaint and discovery requests; Email communications with C. Corbitt re my questions as to the representation of the class reps and other matters.	3.6	\$740.00	\$2,664.00

6/14/2016	Caroline	Corbitt	Email expert re: vehicle inspections.	0.1	\$365.00	\$36.50
6/14/2016	Caroline	Corbitt	Assess interrogatories and RPDs served on plaintiffs and confer with D. Stein re: responses	0.4	\$365.00	\$146.00
6/14/2016	Caroline	Corbitt	Respond to plaintiff Melissa Cushing re: call for discovery responses.	0.1	\$365.00	\$36.50
6/14/2016	Caroline	Corbitt	Email A. De Bartolomeo re: calls with Plaintiffs to discuss discovery responses.	0.1	\$365.00	\$36.50
6/14/2016	Caroline	Corbitt	Continue drafting Melissa Cushing RFPs responses.	0.8	\$365.00	\$292.00
6/14/2016	Caroline	Corbitt	Respond to A. De Bartolomeo question re: coordinating plaintiff discovery responses.	0.1	\$365.00	\$36.50
6/14/2016	Caroline	Corbitt	Respond to plaintiff Richard Beaulieu email re: scheduling phone call to discuss discovery responses.	0.1	\$365.00	\$36.50
6/14/2016	Dave	Stein	work with C Corbitt on discovery responses	0.2	\$605.00	\$121.00
6/14/2016	Dave	Stein	review M Troutman comments on 30b6 notice; further review/revise same; confer with M Troutman re same and re inspection protocol; work with D Hughes to finalize 30b6 notice	1.3	\$605.00	\$786.50
6/14/2016	Dave	Stein	email colleague re possible location of deposition	0.1	\$605.00	\$60.50
6/14/2016	Dave	Stein	prepare for, participate in meet/confer call re vehicle inspections, protocol; follow up call with M Troutman re same	0.9	\$605.00	\$544.50
6/14/2016	Dave	Stein	email L Bailey at Public Justice re arbitration motion	0.1	\$605.00	\$60.50
6/14/2016	Steve	Lopez	Prepare for call and call re inspection protocol	0.7	\$415.00	\$290.50
6/15/2016	AJ	De Bartolomeo	Complete review of the written discovery requests; Office conference with C. Corbitt to prepare the outline for the written discovery responses and the calls with the class representatives.	3.9	\$740.00	\$2,886.00
6/15/2016	Caroline	Corbitt	Call plaintiff John Maticcik re: setting up call to go over discovery responses. Email him re: same.	0.3	\$365.00	\$109.50
6/15/2016	Caroline	Corbitt	Answer call from individual interested in learning more about the case.	0.2	\$365.00	\$73.00
6/15/2016	Caroline	Corbitt	Continue drafting RFP responses of plaintiffs.	1.3	\$365.00	\$474.50
6/15/2016	Caroline	Corbitt	Respond to A. De Bartolomeo question on discovery calls with plaintiffs.	0.1	\$365.00	\$36.50
6/15/2016	Caroline	Corbitt	Email plaintiff Emily Vellano in response to her question about website form sent to her by Honda.	0.1	\$365.00	\$36.50
6/15/2016	Caroline	Corbitt	Confer with A. De Bartolomeo re: responses to Honda discovery requests.	0.3	\$365.00	\$109.50
6/15/2016	Caroline	Corbitt	Email plaintiff Melissa Cushing re: inspection schedule.	0.1	\$365.00	\$36.50
6/15/2016	Caroline	Corbitt	Confer with D. Stein re: Honda inspections.	0.1	\$365.00	\$36.50
6/15/2016	Caroline	Corbitt	Meet with A. De Bartolomeo to discuss objections and responses to approximately 150 interrogatories and RPDs served on plaintiffs.	2.6	\$365.00	\$949.00

6/15/2016	Dave	Stein	final read, review of 30b6 notice for service; email M Troutman re same; prepare correspondence to opposing counsel re same; follow up emails with defense counsel, liaison counsel re same	1.2	\$605.00	\$726.00
6/15/2016	Dave	Stein	confer with M Troutman re inspection protocol negotiation; continue to help coordinate inspections with team, clients, consultants	0.6	\$605.00	\$363.00
6/15/2016	Dave	Stein	work with AJ DeBartolomeo, C Corbitt on responding to Honda discovery requests; review requests for same	1.3	\$605.00	\$786.50
6/15/2016	Dave	Stein	emails with public justice attorneys re arbitration motion	0.1	\$605.00	\$60.50
6/15/2016	Dave	Stein	review recent class member contacts	0.3	\$605.00	\$181.50
6/16/2016	AJ	De Bartolomeo	Review the discovery requests and prepare outline for the calls; Office consult with C. Corbitt as to the preparation of the discovery responses; Monitor and Supervise the calls with 2 of the 3 class reps;	3.9	\$740.00	\$2,886.00
6/16/2016	Caroline	Corbitt	Email attorney of class reps Eugene Turin re: representation agreements.	0.1	\$365.00	\$36.50
6/16/2016	Caroline	Corbitt	Call plaintiff John Maticcik re: vehicle inspection schedule.	0.1	\$365.00	\$36.50
6/16/2016	Caroline	Corbitt	Call with A.J. De Bartolomeo and co-counsel Eugene Turin to discuss plaintiff discovery responses and production.	0.5	\$365.00	\$182.50
6/16/2016	Caroline	Corbitt	Prepare for calls with class representatives, making list of discovery questions and reviewing their documents already produced.	1	\$365.00	\$365.00
6/16/2016	Caroline	Corbitt	Call with plaintiff Richard Beaulieu to discuss responses to discovery questions.	0.8	\$365.00	\$292.00
6/16/2016	Caroline	Corbitt	Call with plaintiff John Maticcik to discuss responses to discovery requests.	1	\$365.00	\$365.00
6/16/2016	Caroline	Corbitt	Confer with A. De Bartolomeo re: drafting ROG and RPD responses.	0.1	\$365.00	\$36.50
6/16/2016	Caroline	Corbitt	Call and email expert re: vehicle inspection schedule.	0.1	\$365.00	\$36.50
6/16/2016	Caroline	Corbitt	Email D. Stein re: plaintiff vehicle inspection schedule.	0.1	\$365.00	\$36.50
6/16/2016	Dave	Stein	continue to work with C Corbitt, co-counsel re inspection scheduling	0.5	\$605.00	\$302.50
6/16/2016	Dave	Stein	continue to work with team re discovery responses	0.7	\$605.00	\$423.50
6/16/2016	Dave	Stein	emails with public justice attorneys re opposition to arbitration motion	0.2	\$605.00	\$121.00
6/16/2016	Dave	Stein	careful review of opening motion to compel arbitration and strategize re response; begin review of underlying caselaw	1.7	\$605.00	\$1,028.50
6/17/2016	AJ	De Bartolomeo	Supervise and participate in the telephone conference with the third class representative to respond to the written discovery;	0.9	\$740.00	\$666.00
6/17/2016	Caroline	Corbitt	Email co-counsel Eugene Turin re: client attorney agreements.	0.1	\$365.00	\$36.50
6/17/2016	Caroline	Corbitt	Continue drafting Richard Beaulieu interrogatory responses.	0.7	\$365.00	\$255.50
6/17/2016	Dave	Stein	emails with defense counsel re death in family, inspections, more time on discovery	0.3	\$605.00	\$181.50

6/17/2016	Dave	Stein	continue review of opening motion to compel arbitration to strategize response; continue review of underlying caselaw; review various purchase, repair documents with arb clauses; prepare for and participate in call with public justice attorney re same	2.6	\$605.00	\$1,573.00
6/18/2016	Caroline	Corbitt	Continue drafting Richard Beaulieu interrogatory responses.	0.4	\$365.00	\$146.00
6/20/2016	Caroline	Corbitt	Continue drafting Richard Beaulieu interrogatory responses. Begin drafting Melissa Cushing interrogatory responses.	5.2	\$365.00	\$1,898.00
6/20/2016	Caroline	Corbitt	Emails with expert re vehicle inspections	0.2	\$365.00	\$73.00
6/20/2016	Caroline	Corbitt	Call plaintiff Richard Beaulieu re: inspection schedule.	0.1	\$365.00	\$36.50
6/20/2016	Caroline	Corbitt	Call plaintiff John Maticik re: inspection schedule.	0.1	\$365.00	\$36.50
6/20/2016	Caroline	Corbitt	Call plaintiff Melissa Cushing re: interrogatory responses.	0.1	\$365.00	\$36.50
6/20/2016	Caroline	Corbitt	Review changes to inspection protocol made by Honda and email team re: same.	0.3	\$365.00	\$109.50
6/20/2016	Caroline	Corbitt	Continue drafting Melissa Cushing responses to discovery requests.	1	\$365.00	\$365.00
6/20/2016	Dave	Stein	emails with defense, liaison counsel re extensions on briefing, discovery; confer with team, public justice attorney re same; review, comment on draft motion and order to extend deadlines	0.5	\$605.00	\$302.50
6/20/2016	Dave	Stein	continue to work with team on discovery responses	0.2	\$605.00	\$121.00
6/20/2016	Dave	Stein	review changes made to inspection protocol by defendant and strategize re need to further negotiate same; confer with C Corbitt re input from clients, consultants; emails with M Troutman re same; review and revise correspondence to defense counsel re same; review response from L Kiser and strategize re next steps; draft and revise further correspondence re same	2.2	\$605.00	\$1,331.00
6/20/2016	Dave	Stein	review co-counsel comments, suggests re response to motion to compel arbitration; strategize re same	0.7	\$605.00	\$423.50
6/21/2016	Caroline	Corbitt	Confer with expert re: protocol for observing and recording inspection.	0.5	\$365.00	\$182.50
6/21/2016	Caroline	Corbitt	Draft email to defense counsel Liv Kaiser re: inspections and send to D. Stein.	0.1	\$365.00	\$36.50
6/21/2016	Caroline	Corbitt	Draft detailed list grouped by category of all documents responsive to Honda's approximately 100 RFPs and ROGs per Plaintiff that may be in Plaintiffs' possession.	1.4	\$365.00	\$511.00
6/21/2016	Caroline	Corbitt	Email plaintiffs re documents to collect responsive to Honda's requests and re vehicle inspections	0.6	\$365.00	\$219.00
6/21/2016	Caroline	Corbitt	Prepare for plaintiff vehicle inspection, making notes and gathering necessary documentation to bring to inspections.	0.9	\$365.00	\$328.50
6/21/2016	Dave	Stein	review recent class member contacts re continuing vibration problems	0.2	\$605.00	\$121.00

6/21/2016	Dave	Stein	continue efforts to coordinate vehicle inspections; emails with L Kiser, M Troutman re same; review CV of Honda expert re same	0.4	\$605.00	\$242.00
6/22/2016	Caroline	Corbitt	Travel to Dartmouth, MA area from Oakland, CA for Richard Beaulieu vehicle inspection.	10	\$365.00	\$3,650.00
6/23/2016	Caroline	Corbitt	Prepare for Honda's inspection of plaintiff Richard Bealieu's vehicle. Meet with Mr. Beaulieu and expert Bill Williams prior to inspection. Attend 12-hour inspection.	13	\$365.00	\$4,745.00
6/23/2016	Dave	Stein	confer with C Corbitt re vehicle inspections	0.2	\$605.00	\$121.00
6/23/2016	Dave	Stein	email L Kiser re inspection data sharing	0.2	\$605.00	\$121.00
6/23/2016	Dave	Stein	emails with public justice attorney re arbitration motion	0.2	\$605.00	\$121.00
6/24/2016	Caroline	Corbitt	Supervise expert Bill William's videotaping of plaintiff Richard Beaulieu's vehicle.	1.7	\$365.00	\$620.50
6/24/2016	Caroline	Corbitt	Meet with plaintiff Richard Beaulieu to discuss case and the inspection of his vehicle the day before.	0.5	\$365.00	\$182.50
6/24/2016	Caroline	Corbitt	Respond to co-counsel Mark Troutman question about vehicle inspections.	0.1	\$365.00	\$36.50
6/24/2016	Caroline	Corbitt	Travel from Dartmouth, MA area to Oakland, CA area to return from Richard Beaulieu vehicle inspection.	11	\$365.00	\$4,015.00
6/24/2016	Dave	Stein	prepare for, participate in call with public justice attorney re arbitration motion	0.4	\$605.00	\$242.00
6/24/2016	Dave	Stein	call with M Troutman to provide update re: inspections and arbitration opposition and to discuss discovery strategy	0.3	\$605.00	\$181.50
6/25/2016	Caroline	Corbitt	Email plaintiff Ashley Payan in response to her question about vehicle sale.	0.1	\$365.00	\$36.50
6/26/2016	Caroline	Corbitt	Email class rep Melissa Cushing detailed email re: vehicle inspection on Tuesday.	0.2	\$365.00	\$73.00
6/26/2016	Caroline	Corbitt	Call plaintiff Ashley Payan about her CR-V trade-in. Email team re: same.	0.6	\$365.00	\$219.00
6/26/2016	Caroline	Corbitt	Draft letter to Mercedes-Benz of El Paso advising them of litigation hold.	0.4	\$365.00	\$146.00
6/27/2016	Caroline	Corbitt	Travel from Oakland to Norfolk, VA area for Cushing inspection.	10	\$365.00	\$3,650.00
6/27/2016	Caroline	Corbitt	Email plaintiff John Maticcik re: meeting time for inspection.	0.1	\$365.00	\$36.50
6/27/2016	Caroline	Corbitt	Call with plaintiff Ashley Payan re vehicle sale.	0.2	\$365.00	\$73.00
6/27/2016	Caroline	Corbitt	Create notice of voluntary dismissal for plaintiff Ashley Payan.	0.3	\$365.00	\$109.50
6/27/2016	Dave	Stein	confer with team re dismissal of plaintiff payan's claims; email defense counsel re same; review and revise correspondence to client re same	0.4	\$605.00	\$242.00
6/27/2016	Steve	Lopez	Review and revise email to client re dismissal	0.5	\$415.00	\$207.50

6/28/2016	Caroline	Corbitt	Prepare for Melissa Cushing vehicle inspection. Meet with Melissa prior to inspection. Attend vehicle inspection.	11.5	\$365.00	\$4,197.50
6/28/2016	Caroline	Corbitt	Conduct inspection and documentation of plaintiff Melissa Cushing's vehicle with expert Bill Williams.	1.1	\$365.00	\$401.50
6/28/2016	Caroline	Corbitt	Call plaintiff Melissa Cushing to update her on the inspection.	0.2	\$365.00	\$73.00
6/28/2016	Caroline	Corbitt	Write detailed summary of today's inspection and send to team.	0.2	\$365.00	\$73.00
6/29/2016	Caroline	Corbitt	Travel from Norfolk, VA area to Westerville, Oh area for John Maticcik vehicle inspection.	6.5	\$365.00	\$2,372.50
6/29/2016	Caroline	Corbitt	Meet with plaintiff John Maticcik at Roush Honda and facilitate car drop off.	1.2	\$365.00	\$438.00
6/29/2016	Dave	Stein	review, revise draft joint agenda; confer with M Troutman, E Gibbs re same	0.8	\$605.00	\$484.00
6/30/2016	Caroline	Corbitt	Prepare for and attend inspection of plaintiff John Maticcik's vehicle.	7.5	\$365.00	\$2,737.50
6/30/2016	Caroline	Corbitt	Test drive plaintiff Richard Beaulieu's vehicle with expert Bill Williams.	0.5	\$365.00	\$182.50
6/30/2016	Caroline	Corbitt	Call plaintiff John Maticcik to update him on the inspection.	0.2	\$365.00	\$73.00
6/30/2016	Caroline	Corbitt	Email D. Stein detailed description of today's inspection.	0.2	\$365.00	\$73.00
6/30/2016	Dave	Stein	confer with M Troutman re joint agenda; further review and revision of same	0.4	\$605.00	\$242.00
6/30/2016	Dave	Stein	emails with public justice attorney re arbitration opposition; prepare for and call re same; confer with E Gibbs re same	0.4	\$605.00	\$242.00
7/1/2016	Caroline	Corbitt	Travel from Westerville, OH area to Oakland, CA, returning from John Maticcik vehicle inspection.	10	\$365.00	\$3,650.00
7/1/2016	Dave	Stein	emails with opposing, liaison counsel re joint agenda; review edits to same and further revise same	0.6	\$605.00	\$363.00
7/5/2016	Caroline	Corbitt	Emails with expert about inspections	0.3	\$365.00	\$109.50
7/5/2016	Caroline	Corbitt	Respond to D. Stein question about Bergendahl sales contract.	0.1	\$365.00	\$36.50
7/5/2016	Caroline	Corbitt	Confer with clients on arbitration briefing	0.4	\$365.00	\$146.00
7/5/2016	Caroline	Corbitt	Examine plaintiff documents existence of for Retail Installment Sales Contracts for use in opposition to compel arbitration. Email results to D. Stein.	0.7	\$365.00	\$255.50
7/5/2016	Caroline	Corbitt	Email Public Justice attorney Karla Gilbride re: client sales agreement.	0.1	\$365.00	\$36.50
7/6/2016	AJ	De Bartolomeo	Email exchanges with C. Corbitt re the discovery responses.	0.6	\$740.00	\$444.00
7/6/2016	Caroline	Corbitt	Draft RPD responses for Richard Beaulieu.	3.1	\$365.00	\$1,131.50
7/6/2016	Caroline	Corbitt	Revise draft of Beaulieu responses to ROGS.	1.4	\$365.00	\$511.00
7/6/2016	Caroline	Corbitt	Revise draft of Cushing responses to ROGS.	1.4	\$365.00	\$511.00

7/6/2016	Caroline	Corbitt	Draft John Maticcik rogs. Revise.	2.8	\$365.00	\$1,022.00
7/6/2016	Caroline	Corbitt	Email various plaintiffs re discovery responses.	0.2	\$365.00	\$73.00
7/6/2016	Dave	Stein	prepare for, participate in monthly status conference with court; confer afterward with team, liaison counsel re next steps, litigation strategy	1.8	\$605.00	\$1,089.00
7/6/2016	Dave	Stein	emails with K Gillbride re arbitration opposition; work with C Corbitt to gather supporting information	0.4	\$605.00	\$242.00
7/7/2016	Caroline	Corbitt	Revise Melissa Cushing interrogatory responses according to additional documents received.	0.6	\$365.00	\$219.00
7/7/2016	Caroline	Corbitt	Revise John Maticcik response to interrogatories according to additional service record.	0.2	\$365.00	\$73.00
7/7/2016	Caroline	Corbitt	Email defense counsel asking for unredacted versions of briefing filed today.	0.1	\$365.00	\$36.50
7/7/2016	Dave	Stein	emails with M Donovan and potential NVH expert re discovery, possible expert retention	0.2	\$605.00	\$121.00
7/7/2016	Dave	Stein	review reply re motion to dismiss; confer with team re possible surreply or motion to strike same	0.8	\$605.00	\$484.00
7/8/2016	AJ	De Bartolomeo	Email and phone communications with D. Stein and/or C. Corbitt re the discovery responses to be served next week.	0.6	\$740.00	\$444.00
7/8/2016	Amy	Zeman	Confer with D. Stein regarding case background and discovery project	0.3	\$550.00	\$165.00
7/8/2016	Amy	Zeman	Begin reviewing documents produced by Honda	0.2	\$550.00	\$110.00
7/8/2016	Caroline	Corbitt	Call co-counsel Eugene Turin to discuss plaintiff vehicle inspections.	0.1	\$365.00	\$36.50
7/8/2016	Caroline	Corbitt	Call with plaintiff Richard Beaulieu to gather additional information for interrogatories.	0.3	\$365.00	\$109.50
7/8/2016	Caroline	Corbitt	Call with plaintiff John Maticcik to gather additional information for interrogatories.	0.6	\$365.00	\$219.00
7/8/2016	Caroline	Corbitt	Call with plaintiff Robert Fennes to update him on status of the case and arbitration motion, and disclose agreement with Public Justice.	0.3	\$365.00	\$109.50
7/8/2016	Caroline	Corbitt	Calls to clients re status of the case.	0.9	\$365.00	\$328.50
7/8/2016	Caroline	Corbitt	Revise Beaulieu and Maticcik ROGs according to calls with them.	2.7	\$365.00	\$985.50
7/8/2016	Clay	Stockton	Analyze Honda's reply brief in support of motion to dismiss to determine whether it exceeds the bounds of the initial motion and communicate with team about same.	1.3	\$400.00	\$520.00
7/8/2016	Dave	Stein	review court order memorializing status conference	0.2	\$605.00	\$121.00
7/8/2016	Dave	Stein	strategize re discovery needs, next steps in litigation; confer with A Zeman, M Troutman re same	0.6	\$605.00	\$363.00

7/8/2016	Dave	Stein	review C Stockton and S Judge assessments of potential sur-reply or motion to strike reply; confer with team, co-counsel re same	0.5	\$605.00	\$302.50
7/8/2016	Dave	Stein	confer with C Corbitt, AJ DeBartolomeo re discovery response preparation	0.3	\$605.00	\$181.50
7/9/2016	Amy	Zeman	Gather documents to review for background.	0.2	\$550.00	\$110.00
7/9/2016	Caroline	Corbitt	Revise Cushing RPD and ROG responses. Send drafts to A. De Bartolomeo.	1.7	\$365.00	\$620.50
7/10/2016	AJ	De Bartolomeo	Review, edits and comments on the mature first draft of the 6 sets of the discovery responses (edited 2 as samples);	2.9	\$740.00	\$2,146.00
7/10/2016	Amy	Zeman	Review documents produced by Honda.	1	\$550.00	\$550.00
7/11/2016	AJ	De Bartolomeo	Working on the discovery responses and consults with D. Stein and C. Corbitt.	6.5	\$740.00	\$4,810.00
7/11/2016	Caroline	Corbitt	Call with plaintiff Melissa Cushing to go over interrogatory responses.	0.4	\$365.00	\$146.00
7/11/2016	Caroline	Corbitt	Edit Melissa Cushing interrogatory responses according to phone call. Edit plaintiff interrogatory responses according to A. De Bartolomeo edits.	1.2	\$365.00	\$438.00
7/11/2016	Caroline	Corbitt	Confer with A. De Bartolomeo re: edits to plaintiff discovery responses.	0.5	\$365.00	\$182.50
7/11/2016	Caroline	Corbitt	Make further revisions to preliminary statement and general objections of plaintiff discovery responses according to A. De Bartolomeo and D. Stein edits.	2.8	\$365.00	\$1,022.00
7/11/2016	Caroline	Corbitt	Contact plaintiffs to ascertain their review of warranties. Draft attestations re: warranty review by plaintiffs.	0.8	\$365.00	\$292.00
7/11/2016	Caroline	Corbitt	Confer with A. De Bartolomeo and D. Stein. Revise ROG and RPD responses for all plaintiffs according to conversation.	6.1	\$365.00	\$2,226.50
7/11/2016	Caroline	Corbitt	Separately email plaintiffs Richard Beaulieu, Melissa Cushing, and John Maticik new drafts of their interrogatories and RPD responses for their review with follow up questions.	0.3	\$365.00	\$109.50
7/11/2016	Dave	Stein	confer with team re discovery responses; review and revise document request responses; review and revise interrogatory responses	4.3	\$605.00	\$2,601.50
7/12/2016	AJ	De Bartolomeo	Continue to work with D. Stein and C. Corbitt to finalize all 6 sets of the discovery; Multiple consults and discussions re same;	5.9	\$740.00	\$4,366.00
7/12/2016	Caroline	Corbitt	Search for plaintiff online postings and confer with D. Stein re: same	0.4	\$365.00	\$146.00
7/12/2016	Caroline	Corbitt	Implement revisions from plaintiffs to ROG and RPD responses. Send to A. de Bartolomeo for her review.	2	\$365.00	\$730.00

7/12/2016	Caroline	Corbitt	Email plaintiffs re draft ROG and RPD responses.	0.2	\$365.00	\$73.00
7/12/2016	Caroline	Corbitt	Make revisions of all RPD and ROG responses for plaintiffs Cushing, Beaulieu, and Maticcik according to edits from team. Edit and proofread all responses and check for consistency of language and objections. Finalize and serve on defense counsel.	8.1	\$365.00	\$2,956.50
7/12/2016	Caroline	Corbitt	Answer call from plaintiff Michelle Bergendahl. Discuss motion for arbitration and update her on the details of the case.	0.2	\$365.00	\$73.00
7/12/2016	Dave	Stein	work with team to finalize discovery responses; final review of same	2.4	\$605.00	\$1,452.00
7/12/2016	Dave	Stein	work with K Gilbride re arbitration opposition, supporting papers; review and revise draft supporting declaration; confer with K Gilbride, C Corbitt re same	0.9	\$605.00	\$544.50
7/13/2016	Amy	Zeman	Work through document production; begin building comprehensive case outline.	2.8	\$550.00	\$1,540.00
7/13/2016	Caroline	Corbitt	Listen to voicemail message from plaintiff Michelle Bergendahl.	0.1	\$365.00	\$36.50
7/13/2016	Caroline	Corbitt	Review contents of Honda Owner's CD and email D. Stein re: contents. Edit draft of arbitration plaintiffs declaration re: warranty disclosure. Confer with D. Stein.	0.4	\$365.00	\$146.00
7/13/2016	Caroline	Corbitt	Leave message for plaintiff Tom Prychitko.	0.1	\$365.00	\$36.50
7/13/2016	Caroline	Corbitt	Begin reviewing and redacting where necessary plaintiffs' documents for production to Honda.	1.2	\$365.00	\$438.00
7/13/2016	Caroline	Corbitt	Answer call from plaintiff Michael Stanley and respond to his questions.	0.2	\$365.00	\$73.00
7/13/2016	Caroline	Corbitt	Examine owner's cd for CR-V. Email team re: contents. Confer with S. Bird re: Bates stamping.	0.8	\$365.00	\$292.00
7/13/2016	Caroline	Corbitt	Respond to D. Stein email about Honda warranty booklet and potential plaintiff declaration.	0.1	\$365.00	\$36.50
7/13/2016	Caroline	Corbitt	Confer with D. Stein re: email to Public Justice co-counsel. Email co-counsel Karla Gilbride re: pro hac vice application process in MDL.	0.2	\$365.00	\$73.00
7/13/2016	Caroline	Corbitt	Respond to co-counsel Karla Gilbride question re: pro hac application.	0.1	\$365.00	\$36.50
7/13/2016	Caroline	Corbitt	Call with Public Justice co-counsel re: arbitration brief and potential client declarations.	0.6	\$365.00	\$219.00
7/13/2016	Dave	Stein	work with A Zeman re discovery strategy next steps	0.4	\$605.00	\$242.00
7/13/2016	Dave	Stein	emails with L Kiser re meet/confer on deposition objections, other matters	0.3	\$605.00	\$181.50
7/13/2016	Dave	Stein	work with C Corbitt to understand client's experiences with arb-related documents for opposition brief	0.3	\$605.00	\$181.50
7/13/2016	Dave	Stein	emails, call with K Gilbride, C Corbitt, liaison counsel re opposing arbitration motion, declarations from clients, etc.	0.8	\$605.00	\$484.00

7/14/2016	AJ	De Bartolomeo	Work with C. Corbitt and D. Stein re redactions and privilege log.	0.7	\$740.00	\$518.00
7/14/2016	Amy	Zeman	Continue document review and case outline. Participate on call with defense counsel regarding discovery and mediation.	3.6	\$550.00	\$1,980.00
7/14/2016	Caroline	Corbitt	Answer call from plaintiff Tom Prychitko and email team re: call.	0.2	\$365.00	\$73.00
7/14/2016	Caroline	Corbitt	Continue compiling, reviewing, and redacting plaintiff Cushing, Maticcik, and Beaulieu documents to be produced to Honda in response to RPDs. Confer several times with team re: same.	4.1	\$365.00	\$1,496.50
7/14/2016	Caroline	Corbitt	Confer with A. De Bartolomeo re: plaintiff document production redactions.	0.1	\$365.00	\$36.50
7/14/2016	Caroline	Corbitt	Check and edit all Bates citations in brief in opposition to motion to compel arbitration.	0.7	\$365.00	\$255.50
7/14/2016	Caroline	Corbitt	Respond to D. Stein question re: extended warranty of plaintiff. Respond to co-counsel Karla Gilbride.	0.2	\$365.00	\$73.00
7/14/2016	Dave	Stein	prepare for and participate in meet/confer with Honda re 30b6 deposition, settlement track, other issues; confer with team, liaison counsel before and after same	1.7	\$605.00	\$1,028.50
7/14/2016	Dave	Stein	emails, call to K Gilbride re opposition to arbitration brief; confer with E Gibbs, liaison counsel re same; review and revise draft brief and provide comments on same; review Honda's brief, underlying cases for same	2.2	\$605.00	\$1,331.00
7/15/2016	AJ	De Bartolomeo	Review and comment on draft letters by C. Corbitt re redaction of productions from class representatives.	0.5	\$740.00	\$370.00
7/15/2016	Caroline	Corbitt	Draft letter to defense counsel for document production and email draft to team. Revise and email plaintiff document production to defense counsel.	0.7	\$365.00	\$255.50
7/15/2016	Caroline	Corbitt	Confer with D. Stein re final details of plaintiff document production. Adapt production based on same.	3.7	\$365.00	\$1,350.50
7/15/2016	Caroline	Corbitt	review and revise draft of opposition to motion to compel arbitration	0.5	\$365.00	\$182.50
7/15/2016	Dave	Stein	review and revise updated draft in opposition to arbitration motion; confer with K Gilbride, M Troutman, team re same; review further edits from co-counsel and further revise based on same	3.9	\$605.00	\$2,359.50
7/18/2016	Caroline	Corbitt	Pull and send relevant documents to co-counsel Karla Gilbride.	0.2	\$365.00	\$73.00
7/18/2016	Dave	Stein	voice message from and prepare for and hold call with M Troutman, S Judge re 30(b)(6) negotiations, litigation and settlement strategy	0.9	\$605.00	\$544.50
7/18/2016	Dave	Stein	emails with K Gilbride re arbitration briefing	0.1	\$605.00	\$60.50

7/18/2016	Dave	Stein	emails with L Kiser re arbitration briefing schedule	0.1	\$605.00	\$60.50
7/19/2016	Caroline	Corbitt	Email co-counsel re: receiving rep agreement of their client.	0.1	\$365.00	\$36.50
7/19/2016	Caroline	Corbitt	Email copy of discovery responses to plaintiffs	0.2	\$365.00	\$73.00
7/19/2016	Caroline	Corbitt	Respond to email from plaintiff Rich Bealieu re: advertisement he received.	0.1	\$365.00	\$36.50
7/20/2016	Caroline	Corbitt	Email plaintiff Richard Beaulieu in response to his email about Honda advertisement.	0.1	\$365.00	\$36.50
7/21/2016	Caroline	Corbitt	Confer with D. Stein re: call to potential expert	0.1	\$365.00	\$36.50
7/22/2016	Caroline	Corbitt	Ascertain number and states of 2016 CR-V owners in Salesforce and email team.	0.3	\$365.00	\$109.50
7/22/2016	Dave	Stein	confer with team re informal discovery needs	0.2	\$605.00	\$121.00
7/22/2016	Dave	Stein	review updated document production from Honda; strategize re further discovery needs; confer with team re same	2.8	\$605.00	\$1,694.00
7/22/2016	Dave	Stein	review revised interrogatory responses from Honda; strategize re possible motion to compel	0.9	\$605.00	\$544.50
7/22/2016	Steve	Lopez	Review amended discovery responses	0.5	\$415.00	\$207.50
7/26/2016	Amy	Zeman	Review new documents and ROG responses. Discuss case with D. Stein.	2.2	\$550.00	\$1,210.00
7/26/2016	Caroline	Corbitt	Email plaintiff Melissa Cushing in response to her document question.	0.1	\$365.00	\$36.50
7/28/2016	Amy	Zeman	Correspond with team regarding scheduling meeting with Honda and regarding ROG response deficiencies.	0.4	\$550.00	\$220.00
7/28/2016	Dave	Stein	strategize with team, M Troutman re next steps in discovery, preparation for settlement talks	0.4	\$605.00	\$242.00
7/28/2016	Dave	Stein	review recent class member contacts	0.2	\$605.00	\$121.00
7/29/2016	Amy	Zeman	Strategize regarding case; confer with D. Stein.	1.1	\$550.00	\$605.00
7/29/2016	Dave	Stein	strategize with A Zeman re next steps in settlement preparation, discovery advancement	0.7	\$605.00	\$423.50
8/2/2016	Amy	Zeman	Draft response to defense counsel regarding ROG responses; communicate with team regarding same. Continue reviewing documents.	5.3	\$550.00	\$2,915.00
8/2/2016	Caroline	Corbitt	Email team re: expert recording of inspections.	0.1	\$365.00	\$36.50
8/2/2016	Dave	Stein	review and revise discovery correspondence to opposing counsel; confer with A Zeman re same	0.2	\$605.00	\$121.00
8/3/2016	Amy	Zeman	Work through documents; investigate facts; call with team in preparation for call with defense counsel.	4.9	\$550.00	\$2,695.00
8/3/2016	Dave	Stein	review and revise draft joint agenda; confer with team, M Troutman re same	0.6	\$605.00	\$363.00

8/3/2016	Dave	Stein	review and revise joint agenda; confer with team, M Troutman re same	0.8	\$605.00	\$484.00
8/4/2016	Amy	Zeman	Continue reviewing documents and preparing questions for discovery call. Participate in discovery call to walk through documents; confer with D. Stein regarding same. Draft follow up email.	4.5	\$550.00	\$2,475.00
8/4/2016	Dave	Stein	review two rounds of defense edits to joint agenda; strategize re further edits to same; call, emails with M Troutman re same	0.7	\$605.00	\$423.50
8/4/2016	Dave	Stein	confer with A Zeman, M Troutman re discovery efforts	0.1	\$605.00	\$60.50
8/7/2016	Dave	Stein	prepare for status hearing; confer with team re same	0.6	\$605.00	\$363.00
8/8/2016	Amy	Zeman	Prepare for status conference; review joint report and discovery status. Participate in status conference via phone; draft summary for team.	0.8	\$550.00	\$440.00
8/8/2016	Dave	Stein	prepare for and participate in telephonic status hearing; confer with team re same	0.6	\$605.00	\$363.00
8/10/2016	Amy	Zeman	Draft email to defense counsel regarding outstanding questions. Prepare new set of questions on recent document production.	2	\$550.00	\$1,100.00
8/15/2016	Amy	Zeman	Correspond with team and with defense counsel regarding setting meeting date.	0.3	\$550.00	\$165.00
8/16/2016	Amy	Zeman	Correspond with team regarding plaintiff who wants to get rid of car; draft email to defense counsel.	0.4	\$550.00	\$220.00
8/22/2016	Caroline	Corbitt	Call with plaintiff John Maticcik re: his vehicle. Email team re: same.	0.3	\$365.00	\$109.50
8/22/2016	Caroline	Corbitt	Ascertain deadlines for next status conference and settlement meeting.	0.1	\$365.00	\$36.50
8/22/2016	Dave	Stein	strategize re expert needs; confer with A Zeman re same; emails with M Donovan re same	0.7	\$605.00	\$423.50
8/22/2016	Dave	Stein	confer with liaison counsel re receipt of time from co-counsel	0.1	\$605.00	\$60.50
8/23/2016	Caroline	Corbitt	Call individuals from website who contacted us about case.	1.3	\$365.00	\$474.50
8/23/2016	Caroline	Corbitt	Answer call from plaintiff Michael Stanley about his recent service visit.	0.2	\$365.00	\$73.00
8/23/2016	Dave	Stein	confer with team re potential expert	0.2	\$605.00	\$121.00
8/23/2016	Dave	Stein	review Honda reply ISO arbitration; strategize re possible surreply or oral argument responses	0.9	\$605.00	\$544.50
8/23/2016	Dave	Stein	review latest class member contacts; confer with C Corbitt re outreach to same	0.6	\$605.00	\$363.00
8/24/2016	Amy	Zeman	In preparation for settlement meeting, review outstanding questions regarding Honda's document production; draft follow up email to defense counsel; analyze substantive response and engage in further follow up communications.	2.8	\$550.00	\$1,540.00
8/24/2016	Caroline	Corbitt	Call with A. Zeman re: contacting clients about upcoming settlement meeting. Create detailed chart for tracking all plaintiff facts, contact info, and applicable pending motions filed by Honda.	2.6	\$365.00	\$949.00

8/24/2016	Dave	Stein	strategize re upcoming settlement meeting and confer with A Zeman re same; review recent class member contacts, complaints, etc., as well as additional information provided by defendant for same	1.4	\$605.00	\$847.00
8/25/2016	Amy	Zeman	Call with potential expert.	0.4	\$550.00	\$220.00
8/25/2016	Caroline	Corbitt	Call with A. Zeman re: vibration experiences of website contacts and plaintiffs.	0.2	\$365.00	\$73.00
8/25/2016	Caroline	Corbitt	Call expert re: Honda inspection equipment. Email team re: same.	0.2	\$365.00	\$73.00
8/25/2016	Caroline	Corbitt	Email D. Hughes re: Honda inspection vehicle footage.	0.1	\$365.00	\$36.50
8/25/2016	Caroline	Corbitt	Emails with expert re: inspection video, scheduling a call.	0.2	\$365.00	\$73.00
8/26/2016	Amy	Zeman	Call with plaintiff R. Fenne re current status, his car, and upcoming mediation.	0.5	\$550.00	\$275.00
8/26/2016	Amy	Zeman	Call with D. Hughes, C. Corbitt, and expert. Correspond with team regarding expert attending meeting; set that up.	1	\$550.00	\$550.00
8/26/2016	Caroline	Corbitt	Confer with expert re: Honda inspection video, mediation.	0.8	\$365.00	\$292.00
8/29/2016	Amy	Zeman	Correspond with expert consultant B. Williams regarding logistics for his attendance at settlement meeting in Los Angeles. Identify most relevant pleadings and briefing and review in preparation for settlement meeting; communicate with E. Gibbs regarding same. Draft email to defense counsel regarding continued outstanding discovery questions. Communicate with team about case facts and settlement strategy. Emails with defense counsel regarding plaintiff's intent to sell vehicle and his continued participation in the lawsuit.	3.4	\$550.00	\$1,870.00
8/29/2016	Dave	Stein	continue to strategize, prepare for settlement meeting; confer with team re same	1.7	\$605.00	\$1,028.50
8/29/2016	Eric	Gibbs	prepare for settlement meeting, c/w A Zeman and D Stein re same	5.8	\$805.00	\$4,669.00
8/30/2016	Amy	Zeman	Call with plaintiff; draft summary	0.8	\$550.00	\$440.00
8/30/2016	Amy	Zeman	Calls with two named plaintiffs and their counsel regarding case status and upcoming settlement meeting. Further communications with team regarding case facts and settlement strategy. Evaluate time entries for firm and for all counsel in preparation for fee discussions at settlement meeting. Analyze communications with class members in context of identifying potential settlement relief; quantify data for use at settlement meeting. Further follow up with defense counsel regarding outstanding questions about documents and information produced by Honda.	8.1	\$550.00	\$4,455.00
8/30/2016	Caroline	Corbitt	Leave message for individual who contacted our firm about the case.	0.1	\$365.00	\$36.50
8/30/2016	Caroline	Corbitt	Write summary of call with website contact for E. Gibbs to take to settlement meeting.	0.3	\$365.00	\$109.50

8/30/2016	Caroline	Corbitt	Call with A. Zeman re: Honda plaintiff complaints. Review complaints about vibration made on NHTSA webpage and email her detailed summary.	0.7	\$365.00	\$255.50
8/30/2016	Caroline	Corbitt	Email D. Stein re: website contact.	0.1	\$365.00	\$36.50
8/30/2016	Caroline	Corbitt	Answer call from website contact returning my message. Interview her about her vehicle's vibration. Email detailed summary of call to team and ask about pursuing a declaration. Confer with D. Hughes and E. Gibbs re: same.	0.9	\$365.00	\$328.50
8/30/2016	Caroline	Corbitt	Answer call from individual who contacted us about her vehicle and email team re: same.	0.2	\$365.00	\$73.00
8/30/2016	Dave	Stein	continue to work with team to prepare for settlement meeting	3.8	\$605.00	\$2,299.00
8/30/2016	Eric	Gibbs	c/w A Zeman re conversations with named plaintiffs	0.2	\$805.00	\$161.00
8/30/2016	Eric	Gibbs	prepare for settlement meeting, c/w D Stein re same, review emails re same	3.1	\$805.00	\$2,495.50
8/31/2016	Amy	Zeman	Travel from Miami to Los Angeles for settlement meeting.	8	\$550.00	\$4,400.00
8/31/2016	Amy	Zeman	Confer with E. Gibbs regarding strategy for settlement meeting.	1	\$550.00	\$550.00
8/31/2016	Dave	Stein	continue to work with team to prepare for settlement meeting	1.3	\$605.00	\$786.50
8/31/2016	Eric	Gibbs	c/w D Stein re settlement options, strategies	0.4	\$805.00	\$322.00
8/31/2016	Eric	Gibbs	travel to LA for settlement conference, spend time preparing for same	1.9	\$805.00	\$1,529.50
8/31/2016	Eric	Gibbs	c/w A Zeman and M. Troutman re settlement conference, continue preparing for same	3.6	\$805.00	\$2,898.00
9/1/2016	Amy	Zeman	Meet with E. Gibbs, M. Troutman, and expert to strategize for settlement meeting; attend meeting with defense counsel and Honda representatives.	6	\$550.00	\$3,300.00
9/1/2016	Amy	Zeman	Travel from L.A. to Miami after settlement meeting.	8	\$550.00	\$4,400.00
9/1/2016	Caroline	Corbitt	Respond to several E. Gibbs emails re: Honda website contact complaints.	0.3	\$365.00	\$109.50
9/1/2016	Dave	Stein	confer with team before, during, after settlement meeting re strategy, next steps	0.8	\$605.00	\$484.00
9/1/2016	Eric	Gibbs	prepare for and attend settlement meeting, travel home	8.3	\$805.00	\$6,681.50
9/1/2016	Eric	Gibbs	prepare notes from settlement meeting, c/w Troutman re same, begin sketching out plan	1.2	\$805.00	\$966.00
9/2/2016	Dave	Stein	confer with E Gibbs re settlement conference, next steps	0.8	\$605.00	\$484.00
9/2/2016	Eric	Gibbs	c/w D Stein re settlement conference, game plan going forward	0.8	\$805.00	\$644.00
9/6/2016	Amy	Zeman	Review L.A. presentation and draft comments for team. Review consumer contacts and begin building spreadsheet of data points. Call with E. Gibbs, D. Stein, and D. Hughes regarding next steps.	3.9	\$550.00	\$2,145.00

9/6/2016	Caroline	Corbitt	Review mileage reported in by drivers who have contacted us and summarize for team	0.4	\$365.00	\$146.00
9/6/2016	Dave	Stein	work with team, co-counsel post-settlement meeting to strategize re next steps in negotiations/litigation; review documents provided by Honda for same	1.8	\$605.00	\$1,089.00
9/6/2016	Dave	Stein	confer with M Troutman re joint agenda draft; review and revise same	0.4	\$605.00	\$242.00
9/6/2016	Dylan	Hughes	work with team, co-counsel post-settlement meeting to strategize re next steps in negotiations/litigation; review documents provided by Honda for same	2.2	\$685.00	\$1,507.00
9/6/2016	Eric	Gibbs	review Honda settlement powerpoint, develop settlement game plan, review emails re settlement, c/w D Hughes, D Stein, A Zeman re settlement strategy	1.8	\$805.00	\$1,449.00
9/7/2016	Amy	Zeman	Develop list of follow up questions and document requests for Honda.	1.7	\$550.00	\$935.00
9/7/2016	Caroline	Corbitt	Call and leave message for website contacts whose vehicles experience vibration. Write call summaries.	2.1	\$365.00	\$766.50
9/7/2016	Dave	Stein	work to finalize joint agenda; email E Gibbs re strategy, next steps	0.4	\$605.00	\$242.00
9/8/2016	Amy	Zeman	Confer with D. Hughes regarding list of follow-up questions; revise draft; email with team regarding same. Review edits to status report and further revise; participate in call with defense counsel regarding same and Mr. Maticik's vehicle.	4.4	\$550.00	\$2,420.00
9/8/2016	Caroline	Corbitt	Write detailed summary of higher mileage vibration complainants and email to D. Stein and A. Zeman.	0.7	\$365.00	\$255.50
9/8/2016	Dave	Stein	review joint agenda edits and confer with team, co-counsel re same	0.2	\$605.00	\$121.00
9/8/2016	Dylan	Hughes	review document request list, circulate revisions to same	0.7	\$685.00	\$479.50
9/8/2016	Eric	Gibbs	edit and circulate revised CMC statement	0.5	\$805.00	\$402.50
9/9/2016	Amy	Zeman	Prepare for and participate in call with defense counsel regarding plaintiff J. Maticik's car sale.	0.5	\$550.00	\$275.00
9/9/2016	Dave	Stein	work with team on settlement strategy, next steps; strategize re same	1.3	\$605.00	\$786.50
9/9/2016	Dylan	Hughes	strategize re approach to Honda settlement and confer with team	1.1	\$685.00	\$753.50
9/9/2016	Eric	Gibbs	c/w D Stein re approach to Honda settlement, c/w D Hughes re same, c/w Mike Mallow re status of settlement talks, ongoing approach	1.3	\$805.00	\$1,046.50
9/10/2016	Eric	Gibbs	c/w GLG team re Mallow call, approach to settlement	1.2	\$805.00	\$966.00
9/12/2016	Amy	Zeman	Research standing issues in preparation for hearing. Correspond with team and client regarding Mr. Maticik's car.	1.8	\$550.00	\$990.00
9/12/2016	Caroline	Corbitt	Email team re: order vacating status conference.	0.1	\$365.00	\$36.50
9/12/2016	Caroline	Corbitt	Email team detailed summary of facts leading to dismissal of plaintiff Ashley Payan.	0.2	\$365.00	\$73.00

9/12/2016	Caroline	Corbitt	Call website contacts to tell them about the case. Email team re: facts of conversations.	1.3	\$365.00	\$474.50
9/12/2016	Caroline	Corbitt	Call Michelle and Robert Bergendahl to update them on status of the case.	0.3	\$365.00	\$109.50
9/12/2016	Caroline	Corbitt	Call plaintiff Bakh Inamov to update him on status of the case.	0.1	\$365.00	\$36.50
9/12/2016	Caroline	Corbitt	Leave voicemail for client Emily Vellano.	0.1	\$365.00	\$36.50
9/12/2016	Caroline	Corbitt	Email client Julia Hsi.	0.1	\$365.00	\$36.50
9/12/2016	Dave	Stein	assist in preparation for status hearing; confer with A Zeman re preservation issues	0.3	\$605.00	\$181.50
9/12/2016	Eric	Gibbs	prepare for hearing	0.2	\$805.00	\$161.00
9/13/2016	Amy	Zeman	Call with E. Turin regarding plaintiff J. Maticcik selling his car; call with M. Troutman regarding same; draft email to defense counsel; call with L. Kiser	1.1	\$550.00	\$605.00
9/13/2016	Amy	Zeman	Call with client M Stanley regarding problems with his car; draft summary for team	0.4	\$550.00	\$220.00
9/15/2016	Amy	Zeman	Correspond with team regarding Maticcik car sale and documents. Email with C. Corbitt regarding consumer contacts.	0.3	\$550.00	\$165.00
9/15/2016	Caroline	Corbitt	Review driver complaints for examples of those who visited or contacted dealerships but received no vibration fix. Email A. Zeman re: same.	0.6	\$365.00	\$219.00
9/15/2016	Caroline	Corbitt	Call client Emily Vellano and update her on status of the case.	0.3	\$365.00	\$109.50
9/15/2016	Caroline	Corbitt	Call plaintiff Bakh Inamov and update him on status of the case.	0.2	\$365.00	\$73.00
9/15/2016	Caroline	Corbitt	Call and email website contacts. Email A. Zeman re: same.	1.1	\$365.00	\$401.50
9/16/2016	Amy	Zeman	Email defense counsel regarding Maticcik car sale. Review documents from client and email regarding date discrepancy.	0.2	\$550.00	\$110.00
9/16/2016	Eric	Gibbs	develop settlement strategies	1	\$805.00	\$805.00
9/22/2016	Eric	Gibbs	develop settlement strategies	2.2	\$805.00	\$1,771.00
9/26/2016	Eric	Gibbs	continue reviewing settlement options, develop strategy	0.8	\$805.00	\$644.00
9/30/2016	Amy	Zeman	Review correspondence regarding J. Maticcik sale records and collect materials; call with C. Corbitt regarding same	0.6	\$550.00	\$330.00
9/30/2016	Caroline	Corbitt	Confer with A. Zeman re: production of Maticcik emails re: vehicle sale. Email her re: same.	0.3	\$365.00	\$109.50
9/30/2016	Caroline	Corbitt	Respond to email sent by website contact re: his vibration service appointment. Call him re: same. Email team re: call details.	0.7	\$365.00	\$255.50
9/30/2016	Caroline	Corbitt	Call and leave voicemails for individuals who contacted our firm about the case.	0.8	\$365.00	\$292.00
9/30/2016	Eric	Gibbs	c/w A Zeman re settlement talks	0.3	\$805.00	\$241.50
10/2/2016	Amy	Zeman	Draft demand letter.	2.5	\$550.00	\$1,375.00

10/3/2016	Amy	Zeman	Continue drafting demand letter	0.9	\$550.00	\$495.00
10/3/2016	Amy	Zeman	Call with liaison counsel M. Troutman regarding case status and strategy	0.4	\$550.00	\$220.00
10/4/2016	Caroline	Corbitt	Email team re: potential plaintiff transmission software update.	0.1	\$365.00	\$36.50
10/4/2016	Dave	Stein	confer with E Gibbs re resolution discussions with defense counsel	0.2	\$605.00	\$121.00
10/4/2016	Eric	Gibbs	prepare for and c/w M Mallow re potential resolution	1.2	\$805.00	\$966.00
10/4/2016	Eric	Gibbs	c/w D Stein re status of discussions	0.2	\$805.00	\$161.00
10/5/2016	Caroline	Corbitt	Email team re: CR-V transmission update software.	0.1	\$365.00	\$36.50
10/6/2016	Amy	Zeman	Research regarding demand letter. Participate in call with E. Gibbs and liaison counsel regarding settlement demand. Correspond with team regarding client inquiries.	1.7	\$550.00	\$935.00
10/6/2016	Caroline	Corbitt	Email clients' attorney Eugene Turin re: transmission software update.	0.1	\$365.00	\$36.50
10/6/2016	Caroline	Corbitt	Email plaintiff Rich Beaulieu in response to his email re: software update.	0.1	\$365.00	\$36.50
10/6/2016	Caroline	Corbitt	Respond to A. Zeman email re: plaintiff transmission software update.	0.1	\$365.00	\$36.50
10/6/2016	Eric	Gibbs	c/w co-counsel re settlement strategy, review, edit, and circulate settlement demand	1.2	\$805.00	\$966.00
10/7/2016	Dave	Stein	review, revise draft demand letter; confer with E Gibbs re same	1.6	\$605.00	\$968.00
10/10/2016	Amy	Zeman	Review and finalize demand letter. Draft joint status report.	1	\$550.00	\$550.00
10/11/2016	Amy	Zeman	Review edits to joint status report; correspond with defense counsel and with liaison counsel regarding same; finalize for filing.	0.7	\$550.00	\$385.00
10/11/2016	Dave	Stein	review and revise draft joint statement; strategize re mediation, next steps	0.3	\$605.00	\$181.50
10/13/2016	Amy	Zeman	Confer with C. Corbitt regarding client inquires and current status. Draft email to other counsel. Review court order.	0.4	\$550.00	\$220.00
10/13/2016	Caroline	Corbitt	Confer with A. Zeman re: plaintiff transmission update and case status.	0.2	\$365.00	\$73.00
10/13/2016	Caroline	Corbitt	Review Pretrial Order 11 issued by Judge Watson	0.1	\$365.00	\$36.50
10/18/2016	Caroline	Corbitt	Leave voicemail for class rep Michelle Bergendahl.	0.1	\$365.00	\$36.50
10/18/2016	Dave	Stein	review recent class member contacts to help assess potential settlement	0.6	\$605.00	\$363.00
10/20/2016	Dave	Stein	confer with liaison counsel re various plaintiffs' firms submission of time records; review same	0.4	\$605.00	\$242.00
10/24/2016	Caroline	Corbitt	Call and leave voicemails for website contacts.	0.7	\$365.00	\$255.50
10/27/2016	Dave	Stein	review time records submitted bimonthly by co-counsel; confer with liaison counsel re collection of same	0.3	\$605.00	\$181.50
10/31/2016	Amy	Zeman	Call with M. Troutman regarding status. Email with team.	0.2	\$550.00	\$110.00
10/31/2016	Caroline	Corbitt	Respond to co-counsel Mark Troutman email re: client Tom Prychitko.	0.1	\$365.00	\$36.50
10/31/2016	Dave	Stein	research re other recall affecting 2015 CRVs for potential overlap with case	0.3	\$605.00	\$181.50

11/2/2016	Caroline	Corbitt	Listen to voicemail from website contact. Leave her voicemail.	0.2	\$365.00	\$73.00
11/2/2016	Caroline	Corbitt	Listen to voicemail from plaintiff Michelle Bergendahl. Leave her voicemail.	0.2	\$365.00	\$73.00
11/3/2016	Amy	Zeman	Research mediator F. Ray; correspond with ream regarding same.	0.3	\$550.00	\$165.00
11/3/2016	Eric	Gibbs	emails exchange w/ co-counsel re potential mediator and status of settlement discussions	0.7	\$805.00	\$563.50
11/9/2016	Dave	Stein	strategize with team re next steps in settlement efforts	0.3	\$605.00	\$181.50
11/10/2016	Caroline	Corbitt	Call and leave voicemail messages for website contacts. Email summary of calls to team.	3.2	\$365.00	\$1,168.00
11/10/2016	Dave	Stein	emails with E Gibbs, M Troutman re negotiations status, joint report filing	0.2	\$605.00	\$121.00
11/10/2016	Dave	Stein	emails with K Gilbride re status of case	0.1	\$605.00	\$60.50
11/10/2016	Dave	Stein	review C Corbitt write-up re recent class member contacts	0.2	\$605.00	\$121.00
11/14/2016	Amy	Zeman	Call with D. Stein and E. Gibbs regarding strategy and joint status report. Review correspondence from defense regarding same. Review documents received from plaintiff J. Maticcik and prepare for production.	1.2	\$550.00	\$660.00
11/14/2016	Caroline	Corbitt	Confer with A. Zeman re: Maticcik prior document production.	0.1	\$365.00	\$36.50
11/14/2016	Dave	Stein	review, propose revisions to joint agenda; confer with team re same; review M Troutman edits to same; further revisions to same	1.4	\$605.00	\$847.00
11/14/2016	Dave	Stein	review most recent class member contacts and confer with team re impact on settlement negotiations	0.3	\$605.00	\$181.50
11/14/2016	Eric	Gibbs	c/w A Zeman and D Stein re draft case management statement, edit and circulate same to local counsel; c/w Mallow re settlement and draft CMC statement	0.9	\$805.00	\$724.50
11/15/2016	Dave	Stein	review recent class member contacts	0.1	\$605.00	\$60.50
11/17/2016	Dave	Stein	review court order extending stay, etc.; confer with team re same	0.3	\$605.00	\$181.50
11/22/2016	Caroline	Corbitt	Email clients re case update	0.2	\$365.00	\$73.00
11/28/2016	Dave	Stein	Confer with team, M Troutman re lack of contact from Honda	0.1	\$605.00	\$60.50
11/30/2016	Caroline	Corbitt	Call/email website contacts re: case info.	0.9	\$365.00	\$328.50
12/5/2016	Dave	Stein	confer with team, co-counsel re settlement negotiation status, next steps	0.2	\$605.00	\$121.00
12/5/2016	Eric	Gibbs	c/w team, co-counsel re mediation and press; review mediator availability	0.4	\$805.00	\$322.00
12/6/2016	Dave	Stein	email MO colleague re same; prepare for and call with MO lawyer re same; email M Troutman re same	0.7	\$605.00	\$423.50
12/7/2016	Dave	Stein	emails with M Troutman re class member contacts; review recent contacts	0.3	\$605.00	\$181.50

12/8/2016	Dave	Stein	emails with new plaintiff's counsel and liaison counsel re coordination of efforts, time-keeping, etc.; confer with team re same	0.4	\$605.00	\$242.00
12/9/2016	Caroline	Corbitt	Answer call from individual interested in case.	0.2	\$365.00	\$73.00
12/9/2016	Caroline	Corbitt	CW D. Stein re: Missouri contacts.	0.1	\$365.00	\$36.50
12/9/2016	Caroline	Corbitt	Email website contact re: case.	0.1	\$365.00	\$36.50
12/9/2016	Caroline	Corbitt	Vet website contact as potential class rep.	0.3	\$365.00	\$109.50
12/9/2016	Caroline	Corbitt	Call and leave messages with website contacts.	1.1	\$365.00	\$401.50
12/9/2016	Dave	Stein	confer with E Gibbs re preparation for mediation; careful review of Honda's response to demand and strategize re next steps	0.9	\$605.00	\$544.50
12/9/2016	Dave	Stein	review recent contacts; confer with C Corbitt re same	0.4	\$605.00	\$242.00
12/12/2016	Caroline	Corbitt	Respond to D. Stein email re: website contacts.	0.1	\$365.00	\$36.50
12/13/2016	Caroline	Corbitt	Vet potential Missouri class representative. Create retainer agreement and email it to him.	1	\$365.00	\$365.00
12/13/2016	Caroline	Corbitt	Return call of plaintiff Michael Stanley. Update him on case developments.	0.2	\$365.00	\$73.00
12/13/2016	Caroline	Corbitt	Call and leave messages for website contacts interested in the case.	0.4	\$365.00	\$146.00
12/14/2016	Caroline	Corbitt	Answer call from individual interested in hearing about the case, and interview her about her vibration problems. Email her my full contact info to collect documents. Email team re: same.	0.4	\$365.00	\$146.00
12/14/2016	Dave	Stein	confer with team, co-counsel re mediation dates, next steps	0.2	\$605.00	\$121.00
12/14/2016	Dave	Stein	emails with defense and co-counsel re status report; review and revise same and confer with team re revisions to same	0.6	\$605.00	\$363.00
12/16/2016	Caroline	Corbitt	Call plaintiff Robert Fennes to update him on case status. Email him latest filing.	0.3	\$365.00	\$109.50
12/16/2016	Caroline	Corbitt	Leave message for prospective client [REDACTED].	0.1	\$365.00	\$36.50
12/22/2016	Caroline	Corbitt	Answer call from plaintiff Michael Stanley.	0.2	\$365.00	\$73.00
1/3/2017	Dave	Stein	review recent production from Honda; strategize re consultant review of same	0.8	\$605.00	\$484.00
1/11/2017	Amy	Zeman	Confer with D. Stein regarding status and mediation; email team to set up conference.	0.3	\$550.00	\$165.00
1/11/2017	Dave	Stein	confer with A Zeman re next steps, preparation for mediation	0.2	\$605.00	\$121.00
1/13/2017	Caroline	Corbitt	Email team re: email from client re: vibration repair notification.	0.1	\$365.00	\$36.50
1/17/2017	Caroline	Corbitt	Call plaintiff Emily Vellano. Email team re: same.	0.2	\$365.00	\$73.00
1/17/2017	Dave	Stein	confer with team re client report of new recall notice, repairs, etc.; review recent press online re same	0.4	\$605.00	\$242.00
1/18/2017	Caroline	Corbitt	Investigate current Honda vibration online news and complaints. Email team re: same.	0.5	\$365.00	\$182.50

1/18/2017	Dave	Stein	confer with C Corbitt re plaintiff repair, preservation issues	0.2	\$605.00	\$121.00
1/18/2017	Dave	Stein	review letter from Honda re preservation of inspected vehicles; confer with co-counsel re same	0.3	\$605.00	\$181.50
1/19/2017	Caroline	Corbitt	Email team re: plaintiff Emily Vellano.	0.1	\$365.00	\$36.50
1/27/2017	Amy	Zeman	Call with team regarding strategy and preparation for mediation.	0.7	\$550.00	\$385.00
1/27/2017	Caroline	Corbitt	CW D. Stein re: preparing for meeting on mediation. Pull relevant data on NHTSA and website complaints for meeting.	1.2	\$365.00	\$438.00
1/27/2017	Dave	Stein	prep for meeting with team to strategize for mediation; participate in same; confer with C Corbitt afterward re next steps; further strategize re same	2.3	\$605.00	\$1,391.50
1/27/2017	Eric	Gibbs	Call with team re mediation strategy, prep	0.7	\$805.00	\$563.50
1/30/2017	Amy	Zeman	Review case materials. Conference call regarding mediation strategy.	1.2	\$550.00	\$660.00
1/30/2017	Caroline	Corbitt	CW D. Stein re: last week's team meeting. Email team re: action items.	0.3	\$365.00	\$109.50
1/30/2017	Dave	Stein	review recent class member contacts and confer with C Corbitt re same	0.2	\$605.00	\$121.00
1/30/2017	Dave	Stein	prepare for and participate in conference call with co-counsel re mediation preparation; confer with team re same	1.6	\$605.00	\$968.00
1/30/2017	Eric	Gibbs	t/c re settlement w/ co-counsel, prepare for mediation	1.6	\$805.00	\$1,288.00
1/31/2017	Caroline	Corbitt	CW D. Stein re: website contact calls. Conduct call with website contact.	0.4	\$365.00	\$146.00
1/31/2017	Dave	Stein	continue to prepare for mediation; confer with C Corbitt re class member outreach; email team re list of action items	0.8	\$605.00	\$484.00
2/1/2017	Caroline	Corbitt	Call website contacts re: their vehicles' vibration. Ask them detailed questions in preparation for mediation and log call notes.	3.4	\$365.00	\$1,241.00
2/1/2017	Caroline	Corbitt	Email team re: suggested edits to CR-V website contacts survey. Email team detailed summaries of best calls with contacts.	1.1	\$365.00	\$401.50
2/2/2017	Caroline	Corbitt	Call website contacts re: their vehicles' vibration. Ask them detailed questions in preparation for mediation and log call notes.	2.4	\$365.00	\$876.00
2/2/2017	Caroline	Corbitt	Email E. Gibbs and D. Stein re: test drive with plaintiff Bakh inamov.	0.1	\$365.00	\$36.50
2/2/2017	Dave	Stein	review C Corbitt update re class member outreach efforts leading up to mediation	0.2	\$605.00	\$121.00
2/3/2017	Caroline	Corbitt	Call website contacts re: their vehicles' vibration. Ask them detailed questions in preparation for mediation.	1.3	\$365.00	\$474.50
2/3/2017	Dave	Stein	confer with M Troutman re class member outreach pre-mediation	0.2	\$605.00	\$121.00
2/6/2017	Caroline	Corbitt	Begin researching NHTSA and other public complaints made by CR-V drivers. Begin compiling best quotes and statistics in preparation for mediation.	3.3	\$365.00	\$1,204.50
2/6/2017	Caroline	Corbitt	Call website contacts and ask detailed questions in preparation for mediation.	0.7	\$365.00	\$255.50

2/6/2017	Dave	Stein	work with C Corbitt re gathering data for mediation; strategize re same	0.4	\$605.00	\$242.00
2/7/2017	Amy	Zeman	Locate competitor vehicle information and circulate to team.	0.2	\$550.00	\$110.00
2/7/2017	Caroline	Corbitt	Call website contacts re: their vehicles' vibration. Ask them detailed questions in preparation for mediation.	3.2	\$365.00	\$1,168.00
2/7/2017	Caroline	Corbitt	Email team re: test drive with local Ohio contact [REDACTED]. Email [REDACTED] re: same.	0.2	\$365.00	\$73.00
2/7/2017	Dave	Stein	confer with C Corbitt, M Troutman re coordinating meeting with class member local to mediation	0.3	\$605.00	\$181.50
2/8/2017	Caroline	Corbitt	Continue researching NHTSA and other public complaints made by CR-V drivers as well as complaints left on firm website. Compile best quotes and statistics in preparation for mediation.	4.7	\$365.00	\$1,715.50
2/9/2017	Dave	Stein	emails with M Troutman re sample vehicle for mediation	0.2	\$605.00	\$121.00
2/21/2017	Caroline	Corbitt	Email class member re: video interview for mediation preparation.	0.1	\$365.00	\$36.50
2/21/2017	Caroline	Corbitt	Compare vibration complaints of Honda and competitor vehicles as well as overall Honda NHTSA complaints. Email team re: statistics.	3.1	\$365.00	\$1,131.50
2/21/2017	Caroline	Corbitt	CW D. Stein re: calls to website contacts in preparation for mediation.	0.1	\$365.00	\$36.50
2/21/2017	Caroline	Corbitt	Listen to voicemail from plaintiff Michelle Bergendhal. Return call.	0.3	\$365.00	\$109.50
2/21/2017	Dave	Stein	emails with M Troutman re mediation preparation	0.1	\$605.00	\$60.50
2/22/2017	Caroline	Corbitt	Contact and interview website contacts in preparation for video interviews for mediation.	1.1	\$365.00	\$401.50
2/22/2017	Caroline	Corbitt	CW D. Stein re: data presentation for mediation.	0.1	\$365.00	\$36.50
2/22/2017	Dave	Stein	review C Corbitt data from research/investigation for mediation; confer with her re same, adding to same, and interviewing class members	0.3	\$605.00	\$181.50
2/23/2017	Amy	Zeman	Begin preparing mediation statement.	0.2	\$550.00	\$110.00
2/23/2017	Caroline	Corbitt	Prepare for video interview with website contact [REDACTED]. Conduct interview.	1.1	\$365.00	\$401.50
2/23/2017	Caroline	Corbitt	Call website contacts re: vehicle experiences and potential video interviews. Email details re: video interviews to contacts.	4.8	\$365.00	\$1,752.00
2/23/2017	Caroline	Corbitt	CW D. Stein and D. Hughes re: video with putative class members recording and structure.	0.3	\$365.00	\$109.50
2/23/2017	Caroline	Corbitt	Email co-counsel Mark Troutman re: video interviews for mediation.	0.1	\$365.00	\$36.50
2/24/2017	Amy	Zeman	Begin drafting mediation statement.	6.2	\$550.00	\$3,410.00
2/24/2017	Caroline	Corbitt	Prepare for interviews and conduct video interviews with website contacts [REDACTED] and [REDACTED] to present at mediation.	1.4	\$365.00	\$511.00
2/24/2017	Caroline	Corbitt	Respond to email from co-counsel Mark Troutman re: video interviews.	0.1	\$365.00	\$36.50
2/24/2017	Caroline	Corbitt	CW A. Zeman re: mediation statement and video interview progress.	0.2	\$365.00	\$73.00
2/24/2017	Dave	Stein	work with team re mediation preparation	0.3	\$605.00	\$181.50

2/24/2017	Eric	Gibbs	prepare for mediation: review demands, review mediation statement draft, review status of video project, email w/ team re best use of video testimony	2.6	\$805.00	\$2,093.00
2/25/2017	Amy	Zeman	Continue drafting mediation statement. Calls with consumers to include descriptions of their experiences.	3.6	\$550.00	\$1,980.00
2/25/2017	Dave	Stein	confer with team re mediation statement	0.1	\$605.00	\$60.50
2/25/2017	Eric	Gibbs	prepare for mediation, draft and edit mediation brief	2.1	\$805.00	\$1,690.50
2/26/2017	Amy	Zeman	Revisions to mediation statement.	1.5	\$550.00	\$825.00
2/26/2017	Dave	Stein	review/revise draft mediation statement; confer with team re same	1.4	\$605.00	\$847.00
2/27/2017	Caroline	Corbitt	Prepare for and conduct video interview with website contact [REDACTED].	0.5	\$365.00	\$182.50
2/27/2017	Caroline	Corbitt	Prepare for video interview with website contact [REDACTED]. Conduct interview.	0.4	\$365.00	\$146.00
2/27/2017	Eric	Gibbs	Review and revise mediation brief	1.2	\$805.00	\$966.00
2/28/2017	Amy	Zeman	Work through edits from liaison counsel. Finalize and send mediation statement.	3	\$550.00	\$1,650.00
2/28/2017	Eric	Gibbs	Review and comment on mediation brief, c/w team re submission	0.6	\$805.00	\$483.00
3/1/2017	Caroline	Corbitt	Complete edits to first cut of video of CRV drivers for mediation	1.7	\$365.00	\$620.50
3/1/2017	Caroline	Corbitt	Email client Bakh Inamov re: test drive of vehicle.	0.1	\$365.00	\$36.50
3/1/2017	Caroline	Corbitt	Email co-counsel Mark Troutman re: video interviews with CR-V drivers.	0.1	\$365.00	\$36.50
3/1/2017	Caroline	Corbitt	Respond to email from website contract re: video interview.	0.1	\$365.00	\$36.50
3/1/2017	Eric	Gibbs	c/w Mallow re mediation, review mediation papers	0.9	\$805.00	\$724.50
3/2/2017	Caroline	Corbitt	Prepare for and attempt video interview with website contact [REDACTED].	0.5	\$365.00	\$182.50
3/2/2017	Caroline	Corbitt	Prepare for video interview with website contact [REDACTED]. Talk to [REDACTED] re: troubleshooting and future video interview.	0.4	\$365.00	\$146.00
3/2/2017	Caroline	Corbitt	Respond to email from contact [REDACTED] re: video interview. Email team re: same.	0.2	\$365.00	\$73.00
3/2/2017	Caroline	Corbitt	Call with website contact [REDACTED] re: video interview. Email her re: same.	0.2	\$365.00	\$73.00
3/2/2017	Caroline	Corbitt	Calls and emails to absent class members	2.2	\$365.00	\$803.00
3/2/2017	Eric	Gibbs	report to team re settlement strategy and c/w Mallow	0.4	\$805.00	\$322.00
3/3/2017	Caroline	Corbitt	Prepare for and conduct video interview with website contact Ernie Litterick.	0.6	\$365.00	\$219.00
3/3/2017	Caroline	Corbitt	CW A. Zeman re: mediation preparation.	0.2	\$365.00	\$73.00
3/4/2017	Caroline	Corbitt	Continue preparing video for mediation	4	\$365.00	\$1,460.00

3/4/2017	Caroline	Corbitt	CW A. Zeman re: status of video interviewing class members and documents to prepare for upcoming mediation.	0.2	\$365.00	\$73.00
3/4/2017	Eric	Gibbs	Review class members notes and comments, review submissions	1.6	\$805.00	\$1,288.00
3/6/2017	Amy	Zeman	Travel from Miami, FL to Columbus, OH for mediation.	5	\$550.00	\$2,750.00
3/6/2017	Amy	Zeman	Dinner meeting with E. Gibbs and liaison counsel to discuss strategy for mediation.	2	\$550.00	\$1,100.00
3/6/2017	Dave	Stein	review unfinished version of video of driver experiences; strategize re modifications; confer with C Corbitt re same	2.3	\$605.00	\$1,391.50
3/6/2017	Dave	Stein	review compilation of NHTSA complaints; revise for clarity, adding emphasis; confer with team re same; search for additional complaints on various websites	0.9	\$605.00	\$544.50
3/6/2017	Eric	Gibbs	Travel for mediation; prepare for mediation; c/w co-counsel re mediation	8.3	\$805.00	\$6,681.50
3/7/2017	Amy	Zeman	Discuss preparation for mediation with E. Gibbs. Attend and participate in mediation in Columbus, OH.	9.5	\$550.00	\$5,225.00
3/7/2017	Caroline	Corbitt	Call with website contact [REDACTED] in response to her email.	0.2	\$365.00	\$73.00
3/7/2017	Dave	Stein	confer with team during mediation	0.3	\$605.00	\$181.50
3/7/2017	Eric	Gibbs	Prepare for and participate in mediation; c/w co-counsel re ongoing settlement strategy	9.5	\$805.00	\$7,647.50
3/8/2017	Amy	Zeman	Preparation for second day of mediation.	7.6	\$550.00	\$4,180.00
3/8/2017	Caroline	Corbitt	Ascertain drive transmission of 15 plaintiffs through purchase documents and email A. Zeman re: same.	0.5	\$365.00	\$182.50
3/8/2017	Dave	Stein	strategize with team during mediation; review term sheet	0.6	\$605.00	\$363.00
3/8/2017	Eric	Gibbs	Participate in mediation	7	\$805.00	\$5,635.00
3/9/2017	Caroline	Corbitt	Call CR-V driver referred by co-counsel Mark Troutman. Email M. Troutman re: same.	0.2	\$365.00	\$73.00
3/10/2017	Amy	Zeman	Communicate with team.	0.3	\$550.00	\$165.00
3/10/2017	Caroline	Corbitt	Email team re: email from plaintiffs' counsel Eugene Turin.	0.1	\$365.00	\$36.50
3/10/2017	Caroline	Corbitt	Draft email to plaintiffs' counsel Eugene Turin for team review.	0.1	\$365.00	\$36.50
3/10/2017	Dave	Stein	strategize with team re next steps in settlement discussion, litigation	0.3	\$605.00	\$181.50
3/13/2017	Caroline	Corbitt	Email plaintiffs' counsel Eugene Turin re: status of case.	0.1	\$365.00	\$36.50
3/13/2017	Caroline	Corbitt	Email plaintiff Richard Beaulieu re: status of case.	0.1	\$365.00	\$36.50
3/13/2017	Dave	Stein	confer with team re status report due tomorrow	0.1	\$605.00	\$60.50
3/13/2017	Eric	Gibbs	C/w Mallow re status conference; c/w co-counsel re same and review emails re same	0.5	\$805.00	\$402.50
3/13/2017	Geoffrey	Munroe	Review record and extensive research of 6th Circuit case law and prior rulings by the Court in prep for settlement approval papers	6.6	\$660.00	\$4,356.00

3/13/2017	Jason	Gibbs	update potential class members on case status	0.2	\$190.00	\$38.00
3/14/2017	Caroline	Corbitt	Respond to team questions re: case updates to co-counsel.	0.1	\$365.00	\$36.50
3/14/2017	Dave	Stein	provide G Munroe information for preliminary approval papers; strategize re same	0.3	\$605.00	\$181.50
3/14/2017	Geoffrey	Munroe	Call with D Stein re facts of case and settlement for use in approval briefing	0.6	\$660.00	\$396.00
3/14/2017	Geoffrey	Munroe	Additional research and emails with E Gibbs re findings	4.6	\$660.00	\$3,036.00
3/15/2017	Caroline	Corbitt	Email team re: message from Plaintiffs' counsel Eugene Turin.	0.1	\$365.00	\$36.50
3/15/2017	Geoffrey	Munroe	Review E Gibbs emails re settlement approval and respond	0.3	\$660.00	\$198.00
3/15/2017	Jason	Gibbs	update class members on status of case	0.7	\$190.00	\$133.00
3/16/2017	Caroline	Corbitt	Locate recently filed tag-along complaint and send to D. Stein.	0.2	\$365.00	\$73.00
3/16/2017	Caroline	Corbitt	Email team re: email from Plaintiffs' counsel Eugene Turin.	0.1	\$365.00	\$36.50
3/17/2017	Caroline	Corbitt	CW D. Stein re: setting up phone meeting of plaintiffs' counsel to discuss progress towards settlement. Draft email and send to E. Gibbs for his review. Send email to plaintiffs' counsel.	0.7	\$365.00	\$255.50
3/17/2017	Caroline	Corbitt	Ascertain additional counsel to potentially include in plaintiffs' counsel meeting. Email team re: same.	0.2	\$365.00	\$73.00
3/17/2017	Eric	Gibbs	C/w co-counsel re filing report to the Court; c/w C Corbitt and team re conference call and status of settlement discussions	0.8	\$805.00	\$644.00
3/20/2017	Caroline	Corbitt	Respond to D. Stein email re: next week's plaintiffs' team call. Email team re: same.	0.2	\$365.00	\$73.00
3/28/2017	Amy	Zeman	Prepare for and conduct call re settlement	1	\$550.00	\$550.00
3/28/2017	Eric	Gibbs	prepare for and conduct call w/ other plaintiffs' counsel	2.7	\$805.00	\$2,173.50
3/29/2017	Eric	Gibbs	c/w D Stein re status of settlement, reaction of co-counsel, briefing and other tasks going forward	0.3	\$805.00	\$241.50
3/30/2017	Dave	Stein	voicemail from, email to B Bell re MO tag along case; review confidentiality order based on Bell's request for access to discovery	0.5	\$605.00	\$302.50
4/4/2017	Jason	Gibbs	calls with class members re status of case, update firm data base	0.3	\$190.00	\$57.00
4/12/2017	Caroline	Corbitt	Call with plaintiff Michael Stanley to update him on case status.	0.3	\$365.00	\$109.50
4/12/2017	Caroline	Corbitt	Leave voicemail for plaintiff Julia Hsi. Email her re update call.	0.2	\$365.00	\$73.00
4/12/2017	Caroline	Corbitt	Call with plaintiff Bakh Inamov to update him on case status.	0.2	\$365.00	\$73.00
4/12/2017	Caroline	Corbitt	Leave voicemail for plaintiff Emily Velleno re: case status.	0.1	\$365.00	\$36.50
4/12/2017	Caroline	Corbitt	Leave voicemail for plaintiff Bob Nonni re: case status.	0.1	\$365.00	\$36.50
4/12/2017	Caroline	Corbitt	Call plaintiffs Michelle and Robert Bergendahl re: case status.	0.2	\$365.00	\$73.00
4/13/2017	Caroline	Corbitt	Listen to voicemails from plaintiffs.	0.1	\$365.00	\$36.50
4/14/2017	Dave	Stein	emails with B Bell re settlement, discovery	0.3	\$605.00	\$181.50
4/25/2017	Caroline	Corbitt	Respond to email from plaintiff Rich Bealieu re: case status.	0.1	\$365.00	\$36.50

4/28/2017	Caroline	Corbitt	Return call of website contact.	0.2	\$365.00	\$73.00
5/2/2017	Amy	Zeman	Email with team regarding hearing and attend hearing by phone.	0.3	\$550.00	\$165.00
5/2/2017	Dave	Stein	confer with team, co-counsel before/after hearing with court	0.2	\$605.00	\$121.00
5/2/2017	Eric	Gibbs	prepare for and participate in call with Court	0.8	\$805.00	\$644.00
5/2/2017	Jason	Gibbs	calls with potential class members re status of case, update firm data base	0.4	\$190.00	\$76.00
5/3/2017	Dave	Stein	review court order; confer with E Gibbs re schedule, next steps	0.1	\$605.00	\$60.50
5/5/2017	Caroline	Corbitt	Respond to email from website contact [REDACTED]	0.1	\$365.00	\$36.50
5/5/2017	Caroline	Corbitt	Leave voicemail for plaintiff Bob Nonni.	0.1	\$365.00	\$36.50
5/12/2017	Caroline	Corbitt	Respond to email from plaintiff Julia Hsi. Email team re: same.	0.2	\$365.00	\$73.00
5/23/2017	Caroline	Corbitt	Begin verifying accuracy of information in settlement agreement recitals and email D. Stein re: same.	0.9	\$365.00	\$328.50
5/23/2017	Caroline	Corbitt	CW D. Stein re: updating plaintiffs on case status.	0.1	\$365.00	\$36.50
5/23/2017	Dave	Stein	review draft settlement agreement prepared by Honda; reference MOU and other earlier documents for same; confer with team, co-counsel re same; brief legal research into related issues concerning objection and opt outs; begin thorough revision of settlement agreement	8.4	\$605.00	\$5,082.00
5/24/2017	Caroline	Corbitt	CW D. Stein re: prior dismissal of plaintiffs referenced in settlement agreement	0.3	\$365.00	\$109.50
5/24/2017	Dave	Stein	continue review, revision of draft settlement agreement; confer with C Corbitt to confirm/fix inaccuracies; call with co-counsel re same; meet with E Gibbs to discuss proposed changes, negotiation next steps; further review and revision following E Gibbs meeting; legal research re incentive awards & named plaintiff releases for same	5.3	\$605.00	\$3,206.50
5/24/2017	Eric	Gibbs	in depth review of revised draft settlement agreement w/ D Stein, review term sheet and documents from other settlements	1.4	\$805.00	\$1,127.00
5/25/2017	Dave	Stein	emails with M Troutman re settlement agreement	0.1	\$605.00	\$60.50
5/30/2017	Dave	Stein	review co-counsel comments, suggestions re settlement agreement; further revisions to same; email to E Gibbs summarizing same	1.2	\$605.00	\$726.00
6/5/2017	Dave	Stein	confer with co-counsel re revisions to settlement agreement	0.1	\$605.00	\$60.50
6/6/2017	Eric	Gibbs	review and edit draft settlement agreement, circulate same	0.4	\$805.00	\$322.00
6/20/2017	Jason	Gibbs	call with class member re status of case	0.1	\$190.00	\$19.00
6/23/2017	Dave	Stein	review latest edits to draft agreement; assist E Gibbs re settlement negotiations, draft agreement	2.1	\$605.00	\$1,270.50
6/23/2017	Eric	Gibbs	c/w D Stein and prepare for settlement conference w/ Mallow, participate in settlement conference w/ Mallow	2.8	\$805.00	\$2,254.00
6/26/2017	Dave	Stein	review defendant edits to settlement agreement; confer with E Gibbs re same	1.6	\$605.00	\$968.00

6/27/2017	Dave	Stein	Review E Gibbs revisions to draft settlement agreement; provide further comments, suggestions re same	0.7	\$605.00	\$423.50
6/27/2017	Eric	Gibbs	review and redline SA, c/w M. Troutman re same and timing regarding finalizing settlement	1.3	\$805.00	\$1,046.50
6/27/2017	Eric	Gibbs	review liaison counsel edits to SA, c/w G Munroe re preliminary approval brief, email defense counsel re draft SA	0.9	\$805.00	\$724.50
6/27/2017	Geoffrey	Munroe	Review draft settlement papers, docket, case files for use in drafting approval papers; legal research re approval issues	6.6	\$660.00	\$4,356.00
6/28/2017	Amy	Zeman	Confer with D. Stein, G. Munroe regarding information needed for preliminary approval briefing.	0.3	\$550.00	\$165.00
6/28/2017	Dave	Stein	Strategize re preliminary approval and confer with team, co-counsel re same	0.6	\$605.00	\$363.00
6/28/2017	Geoffrey	Munroe	Call with team, liaison counsel re preliminary approval briefing, open fee negotiations, overall settlement approval strategy; report to EHG re same	0.6	\$660.00	\$396.00
6/28/2017	Geoffrey	Munroe	Research and begin drafting preliminary approval brief	8.2	\$660.00	\$5,412.00
6/29/2017	Amy	Zeman	Gather data for G Munroe; draft email to C Corbitt regarding additional needs for preliminary approval papers	0.6	\$550.00	\$330.00
6/29/2017	Dave	Stein	confer with E Gibbs re latest settlement negotiations; review and revise settlement agreement to conform to same; email E Gibbs, M Mallow re same	2.2	\$605.00	\$1,331.00
6/29/2017	Dave	Stein	review co-counsel draft status report; revise same; confer with E Gibbs re same	0.7	\$605.00	\$423.50
6/29/2017	Eric	Gibbs	review settlement drafts and comment on and edit same, c/w Mallow re same, c/w D. Stein re same	2.1	\$805.00	\$1,690.50
6/29/2017	Geoffrey	Munroe	Continue drafting preliminary approval brief	6.3	\$660.00	\$4,158.00
6/30/2017	Caroline	Corbitt	Respond to A. Zeman email re: research for preliminary approval of settlement filing.	0.1	\$365.00	\$36.50
6/30/2017	Dave	Stein	call with E Gibbs, co-counsel re status report, status of negotiations, etc.	0.4	\$605.00	\$242.00
6/30/2017	Dave	Stein	review co-counsel edits to status report; confer with E Gibbs, co-counsel re procedural issues relating to settlement approval process; review defense counsel edits to report and confer with team re same	0.7	\$605.00	\$423.50
6/30/2017	Eric	Gibbs	review edit and circulate draft status report; c/w M. Troutman and team re same and status of settlement discussions;	0.8	\$805.00	\$644.00
7/5/2017	Eric	Gibbs	review revised SA, prepare status email and forward to co-counsel	0.6	\$805.00	\$483.00
7/5/2017	Eric	Gibbs	c/w G Munroe re status of preliminary approval brief and modifications to SA; brief c/w Mallow re same	0.6	\$805.00	\$483.00

7/6/2017	Eric	Gibbs	review liaison counsel edits and comments to settlement agreement	0.3	\$805.00	\$241.50
7/6/2017	Geoffrey	Munroe	Complete draft of preliminary approval brief (except intro)	8.1	\$660.00	\$5,346.00
7/6/2017	Jason	Gibbs	call with potential class member re case status	0.1	\$190.00	\$19.00
7/7/2017	Geoffrey	Munroe	Draft introduction, review and revise preliminary approval brief	7.5	\$660.00	\$4,950.00
7/8/2017	Geoffrey	Munroe	Review emails and case law circulated by defense counsel and co-counsel re b2 notice, email re same	0.4	\$660.00	\$264.00
7/9/2017	Eric	Gibbs	review Notice cases	0.4	\$805.00	\$322.00
7/10/2017	Caroline	Corbitt	Research supporting documents and facts for preliminary settlement approval motion requested by A. Zeman and G. Munroe. Email them re: same.	4.4	\$365.00	\$1,606.00
7/10/2017	Eric	Gibbs	review case law bearing on settlement, preliminary approval	0.7	\$805.00	\$563.50
7/11/2017	Amy	Zeman	Confer with team regarding settlement and calls to named plaintiffs.	0.3	\$550.00	\$165.00
7/11/2017	Caroline	Corbitt	Review settlement agreement and prepare for calls with clients to provide detailed updates/explanations	3.4	\$365.00	\$1,241.00
7/11/2017	Caroline	Corbitt	CW team re: conveying settlement to plaintiffs.	0.1	\$365.00	\$36.50
7/11/2017	Caroline	Corbitt	Return call of plaintiff Michelle Bergendahl.	0.2	\$365.00	\$73.00
7/11/2017	Caroline	Corbitt	Return call of plaintiff Bob Nonni.	0.2	\$365.00	\$73.00
7/11/2017	Dave	Stein	legal research into treatises, cases on b2 settlement notice in response to defendant's proposal to forego notice; confer with team re same and re discussions with client re settlement; review latest changes to settlement agreement based on same	1.3	\$605.00	\$786.50
7/11/2017	Eric	Gibbs	review notice cases, review D Stein emails, review draft SA, c/w Amy and C Corbitt re class rep discussions	1.3	\$805.00	\$1,046.50
7/11/2017	Jason	Gibbs	calls with class members re status of claims, update firm data base	0.2	\$190.00	\$38.00
7/12/2017	Amy	Zeman	Review settlement and summary. Call clients with C. Corbitt to explain settlement terms and process. Confer with D. Stein and with E. Gibbs regarding response.	1.9	\$550.00	\$1,045.00
7/12/2017	Caroline	Corbitt	Call with A. Zeman and plaintiff Michelle Bergendahl to discuss settlement.	0.4	\$365.00	\$146.00
7/12/2017	Caroline	Corbitt	With A. Zeman, conduct separate calls with plaintiffs Michael Stanley, Robert Fennes, Emily Vellano, and Bakh Inamov re: settlement reached with Honda.	1.2	\$365.00	\$438.00
7/12/2017	Eric	Gibbs	complete review of SA and Notice cases, annotate SA for M Mallow call	0.6	\$805.00	\$483.00
7/12/2017	Eric	Gibbs	prepare and call with M Mallow re settlement negotiations	0.4	\$805.00	\$322.00
7/13/2017	Caroline	Corbitt	Respond to D. Stein email re: settlement agreement.	0.1	\$365.00	\$36.50
7/13/2017	Eric	Gibbs	review revised SA, forward with comments to liaison counsel	0.4	\$805.00	\$322.00
7/14/2017	Caroline	Corbitt	Call with plaintiff Julia Hsi to discuss settlement.	0.3	\$365.00	\$109.50

7/14/2017	Caroline	Corbitt	Call with plaintiff Bob Nonni to discuss settlement.	0.4	\$365.00	\$146.00
7/14/2017	Caroline	Corbitt	Call with plaintiffs Bob and Michelle Bergendahl to discuss settlement.	0.3	\$365.00	\$109.50
7/14/2017	Caroline	Corbitt	Write and email team detailed summary of progress on calls to named plaintiffs re: settlement to date.	0.2	\$365.00	\$73.00
7/17/2017	Caroline	Corbitt	CW A. Zeman re: status of finalizing settlement agreement. Email E. Gibbs re: same.	0.2	\$365.00	\$73.00
7/17/2017	Dave	Stein	confer with E Gibbs, liaison counsel re status of settlement finalization; draft/revise notice for Honda Owner Link website and reference underlying documents (TSB, settlement agreement, past examples) for same	1.4	\$605.00	\$847.00
7/18/2017	Dave	Stein	review comments/revisions to draft owner link notice; further revise same	0.4	\$605.00	\$242.00
7/18/2017	Dave	Stein	prepare draft long form class notice; confer with E Gibbs, co-counsel re same	2.1	\$605.00	\$1,270.50
7/19/2017	Caroline	Corbitt	Proofread and check accuracy of settlement notices and other proposed settlement documents. Provide revision suggestions to D Stein	1.6	\$365.00	\$584.00
7/19/2017	Caroline	Corbitt	Implement all team edits to settlement documents and send documents to D. Stein for circulation to Honda.	0.3	\$365.00	\$109.50
7/19/2017	Dave	Stein	review co-counsel comments/suggestions for class notice; further revise same; prepare additional notices contemplated by settlement agreement; confer with co-counsel, team re same; email opposing counsel re same	2.3	\$605.00	\$1,391.50
7/19/2017	Dave	Stein	legal research re class notice in light of no fee deal; confer with G Munroe re same	0.8	\$605.00	\$484.00
7/20/2017	Caroline	Corbitt	CW D. Stein re: Honda preliminary approval papers.	0.1	\$365.00	\$36.50
7/20/2017	Caroline	Corbitt	Draft declaration of Eric Gibbs in support of preliminary settlement approval. Begin drafting proposed order re: same.	2.6	\$365.00	\$949.00
7/20/2017	Dave	Stein	review draft preliminary approval motion and brief; confer with C Corbitt re preparation of supporting papers and identifying sources of information and documents to cite in same; review and revise draft motion and brief	3.4	\$605.00	\$2,057.00
7/21/2017	Caroline	Corbitt	Email team re: email from Plaintiff Tom Prychitko.	0.1	\$365.00	\$36.50
7/21/2017	Caroline	Corbitt	Email plaintiff Tom Prychitko and co-counsel Mark Troutman.	0.1	\$365.00	\$36.50
7/21/2017	Caroline	Corbitt	Draft proposed order ISO preliminary settlement approval.	3.4	\$365.00	\$1,241.00
7/21/2017	Caroline	Corbitt	Email co-counsel Mark Troutman re: plaintiff Tom Prychitko.	0.1	\$365.00	\$36.50
7/21/2017	Caroline	Corbitt	CW D. Stein re: drafting Injunctive Relief Order to accompany settlement.	0.1	\$365.00	\$36.50
7/21/2017	Caroline	Corbitt	Review D. Stein edits to E. Gibbs declaration iso preliminary approval.	0.2	\$365.00	\$73.00

7/21/2017	Caroline	Corbitt	Review D. Stein edits to proposed order granting preliminary approval of settlement.	0.1	\$365.00	\$36.50
7/21/2017	Caroline	Corbitt	Review draft settlement agreement for any edits and to ascertain exhibits to be drafted. Email D. Stein re: same.	1.4	\$365.00	\$511.00
7/21/2017	Caroline	Corbitt	Begin drafting injunctive relief order to be attached to settlement agreement.	1.1	\$365.00	\$401.50
7/21/2017	Dave	Stein	confer with co-counsel in light of defendant silence and looming deadline	0.2	\$605.00	\$121.00
7/21/2017	Dave	Stein	review/revise proposed preliminary approval order; confer with C Corbitt re further revision to same and other supporting papers	0.6	\$605.00	\$363.00
7/21/2017	Dave	Stein	review and revise draft declaration for preliminary approval; confer with C Corbitt re further revision of same	0.6	\$605.00	\$363.00
7/21/2017	Eric	Gibbs	c/w co-counsel re status of settlement discussions, reporting to court	0.7	\$805.00	\$563.50
7/24/2017	Dave	Stein	emails with liaison counsel re defense counsel non-responsiveness, upcoming status hearing	0.1	\$605.00	\$60.50
7/24/2017	Dave	Stein	emails with MO lawyer B Bell re status conference, next steps	0.2	\$605.00	\$121.00
7/25/2017	Caroline	Corbitt	Revise declaration, proposed order, and brief iso preliminary settlement approval according to D. Stein feedback.	4.9	\$365.00	\$1,788.50
7/26/2017	Caroline	Corbitt	Research language and caselaw for proposed injunctive relief order to include as attachment to the settlement agreement. Prepare proposed order.	3.9	\$365.00	\$1,423.50
7/26/2017	Dave	Stein	work through latest comments from defense counsel re settlement; review E Gibbs revisions to settlement agreement and suggest further revisions to same; prepare for status hearing	1.2	\$605.00	\$726.00
7/26/2017	Dave	Stein	review further revised preliminary approval papers (brief, order, declaration) with latest edits; further revise same	1.2	\$605.00	\$726.00
7/26/2017	Dave	Stein	near-final review of settlement agreement for last concerns, internal consistency, etc.	1.4	\$605.00	\$847.00
7/26/2017	Eric	Gibbs	prepare for and c/w Court re status, internal conferences and co-counsel conferences re same; update settlement agreement status, c/w Mallow re same	2.1	\$805.00	\$1,690.50
7/27/2017	Caroline	Corbitt	Call with plaintiff Tom Prychitko and co-counsel Mark Troutman to discuss settlement.	0.3	\$365.00	\$109.50
7/27/2017	Caroline	Corbitt	CW D. Stein re: circulating preliminary approval papers.	0.1	\$365.00	\$36.50
7/27/2017	Caroline	Corbitt	Respond to D. Stein email re: revisions to preliminary approval memo language.	0.1	\$365.00	\$36.50

7/27/2017	Caroline	Corbitt	Revise all documents comprising preliminary approval filing, including memo and proposed orders, per D. Stein and E. Gibbs feedback. Add missing citations. Send to co-counsel for their review.	2.7	\$365.00	\$985.50
7/27/2017	Caroline	Corbitt	Draft emails to various co-counsel re: settlement. Email E. Gibbs re: same.	0.3	\$365.00	\$109.50
7/27/2017	Dave	Stein	complete review of settlement agreement and confer with C Corbitt re information to track down, E Gibbs re next steps	0.3	\$605.00	\$181.50
7/28/2017	Caroline	Corbitt	Review and implement co-counsel Isaac Wiles edits to preliminary approval briefing, including two proposed orders. Send revised documents to E. Gibbs for his review.	0.4	\$365.00	\$146.00
7/28/2017	Dave	Stein	review co-counsel edits, comments, suggestions re preliminary approval brief and other supporting documents; further revise same and confer with team re same; email defense counsel re minor edits to settlement agreement and exhibits to the settlement agreement	1.3	\$605.00	\$786.50
8/3/2017	Dave	Stein	review recent federal appellate ruling re timing of fee motion in relation to objection deadline	0.3	\$605.00	\$181.50
8/7/2017	Dave	Stein	update to M Troutman re settlement progress	0.1	\$605.00	\$60.50
8/9/2017	Dave	Stein	email from defense counsel re final client approval of settlement; confer with team, co-counsel re same and review MOU and current agreement for potential revisions	0.3	\$605.00	\$181.50
8/10/2017	Eric	Gibbs	c/w liaison counsel re status of settlement papers, email exchange w/ Mallow	0.3	\$805.00	\$241.50
8/15/2017	Dave	Stein	review order re status conference; emails with B Bell re same	0.2	\$605.00	\$121.00
8/16/2017	Dave	Stein	review Honda edits to settlement agreement; provide written feedback on same to E Gibbs including recommendations on further edits; confer with E Gibbs re same	0.9	\$605.00	\$544.50
8/16/2017	Eric	Gibbs	review revised draft of SA, email w/ co-counsel	0.8	\$805.00	\$644.00
8/17/2017	Dave	Stein	review M Troutman, G Travalio comments on latest revisions to settlement agreement; confer with E Gibbs re same	0.4	\$605.00	\$242.00
8/22/2017	Jason	Gibbs	calls with class members re case status, update firm data base	0.1	\$190.00	\$19.00
8/24/2017	Dave	Stein	prepare for and call with E Gibbs to discuss latest settlement agreement changes and to prepare for call with defense counsel; call with M Mallow, E Gibbs re same; further revise settlement agreement following call; emails with liaison counsel re same	1.5	\$605.00	\$907.50
8/24/2017	Eric	Gibbs	call with D Stein re settlement agreement edits by Honda; prep and call with Mallow	0.9	\$805.00	\$724.50
8/25/2017	Caroline	Corbitt	Email case updates to plaintiffs	0.2	\$365.00	\$73.00

8/25/2017	Caroline	Corbitt	Case update call with plaintiff Michelle Bergendahl.	0.3	\$365.00	\$109.50
8/25/2017	Caroline	Corbitt	Leave case update voicemail for plaintiff Michael Stanley.	0.1	\$365.00	\$36.50
8/29/2017	Caroline	Corbitt	Email D. Stein and E. Gibbs several times re: status of final settlement agreement and contacting plaintiffs.	0.2	\$365.00	\$73.00
8/29/2017	Caroline	Corbitt	Email plaintiffs' counsel Eugene Turin re: progress of settlement and contacting plaintiffs.	0.1	\$365.00	\$36.50
8/29/2017	Dave	Stein	emails with defense, co-counsel arranging pre-hearing calls; prepare for hearing, calls (review prior status reports, notes from hearings); participate in call with co-counsel re same; pull class notices from other suits in which no fee deal was reached to evaluate any changes needed to notices, brief in support of preliminary approval; confer with E Gibbs re same; call with defense counsel re hearing; participate in telephone hearing	1.6	\$605.00	\$968.00
8/29/2017	Dave	Stein	prepare settlement agreement for distribution to other plaintiffs attorneys; confer with E Gibbs re same; email B Bell re same; confer with C Corbitt re sharing settlement with clients, other counsel	0.3	\$605.00	\$181.50
8/29/2017	Eric	Gibbs	prepare for hearing, c/w D Stein, co-counsel and defense counsel, participate in hearing	2.3	\$805.00	\$1,851.50
8/30/2017	Caroline	Corbitt	Leave voicemail for plaintiffs' counsel Eugene Turin.	0.1	\$365.00	\$36.50
8/30/2017	Caroline	Corbitt	Email co-counsel Mark Troutman several times re: settlement agreement.	0.2	\$365.00	\$73.00
8/31/2017	Caroline	Corbitt	Respond to email from plaintiffs' counsel Eugene Turin.	0.1	\$365.00	\$36.50
8/31/2017	Caroline	Corbitt	Email case updates to clients	0.2	\$365.00	\$73.00
9/8/2017	Dave	Stein	further revise settlement agreement to account for lack of fee deal; review prior settlement agreements for same	0.7	\$605.00	\$423.50
9/12/2017	Caroline	Corbitt	Review email from McGuire law re: their clients' reaction to proposed settlement. Email E. Gibbs re: same.	0.2	\$365.00	\$73.00
9/12/2017	Dave	Stein	email from other plaintiffs' counsel re client reaction to settlement; confer with team re same	0.3	\$605.00	\$181.50
9/13/2017	Dave	Stein	voice message to B Bell re settlement; call with B Bell re settlement, client review of agreement	0.3	\$605.00	\$181.50
9/15/2017	Dave	Stein	confer with E Gibbs re status of settlement finalization	0.2	\$605.00	\$121.00
9/15/2017	Eric	Gibbs	review past filings with Court, c/w D Stein and c/w Ohio counsel re status of settlement discussions	1.4	\$805.00	\$1,127.00
9/19/2017	Caroline	Corbitt	Review status conference order. Email team re: same.	0.2	\$365.00	\$73.00
9/20/2017	Dave	Stein	call with K Gilbride (Public Justice) re settlement	0.3	\$605.00	\$181.50
9/21/2017	Dave	Stein	emails with B Bell re explaining settlement to client, scheduling call	0.2	\$605.00	\$121.00

10/3/2017	Dave	Stein	emails, call with MO counsel re settlement; lengthy call with MO class rep re settlement; confer with team re same; review MO class rep repair invoices re same	1.6	\$605.00	\$968.00
10/4/2017	Dave	Stein	call with B Bell re MO class rep repair invoices, settlement finalization; confer with E Gibbs re same	0.6	\$605.00	\$363.00
10/4/2017	Eric	Gibbs	c/w DS re Missouri case, settlement status	0.4	\$805.00	\$322.00
10/15/2017	Dave	Stein	review Honda edits to various notices (exhibits to settlement agreement); consult MOU, settlement agreement for same; strategize re suggested further revisions	1.1	\$605.00	\$665.50
10/16/2017	Dave	Stein	confer with E Gibbs, liaison counsel re preparation for status hearing	0.5	\$605.00	\$302.50
10/16/2017	Dave	Stein	review co-counsel edits to revised settlement notices; further revise same with redlines to send to Honda	0.6	\$605.00	\$363.00
10/16/2017	Dave	Stein	calls, emails with L Kiser, liaison counsel re rescheduling status hearing	0.3	\$605.00	\$181.50
10/16/2017	Dave	Stein	review settlement agreement, preliminary papers, proposed orders and conform to updated settlement notices; confer with E Gibbs re same	0.7	\$605.00	\$423.50
10/16/2017	Dave	Stein	call with court re status hearing continuance; draft and revise joint motion to continue hearing; confer with E Gibbs, liaison counsel re same	0.4	\$605.00	\$242.00
10/16/2017	Eric	Gibbs	review D Stein edits to settlement notices and circulate to Ohio counsel, c/w M. Troutman re same and Wednesday hearing	0.6	\$805.00	\$483.00
10/16/2017	Eric	Gibbs	c/w Ds re Wednesday hearing; review, revise, circulate settlement notices	0.6	\$805.00	\$483.00
10/18/2017	Dave	Stein	review minute entries and confer with team to ensure consistency of dates	0.1	\$605.00	\$60.50
10/23/2017	Dave	Stein	confer with E Gibbs re status conference preparation; call with E Gibbs, M Troutman to discuss next steps, including fee demand	0.6	\$605.00	\$363.00
10/23/2017	Eric	Gibbs	prepare for and c/w M. Troutman in prep for and participation in court conference, c/w D Stein re open issues and next steps	0.6	\$805.00	\$483.00
10/24/2017	Dave	Stein	review time entries for purposes of fee demand; break into categories and strategize re same; calculate blended rates, hour totals, etc.; confer with E Gibbs, M Troutman re same	1.8	\$605.00	\$1,089.00
10/24/2017	Eric	Gibbs	continue to work toward resolving matter, c/w Mallow re open issues	0.8	\$805.00	\$644.00
10/25/2017	Caroline	Corbitt	Call prospective class member and email D. Stein and E. Gibbs re: same.	0.3	\$365.00	\$109.50
10/25/2017	Dave	Stein	confer with M Troutman re categorizing atty fees to aid in fee demand	0.2	\$605.00	\$121.00
10/26/2017	Dave	Stein	review liaison counsel lodestar info and assemble with our time and other firms' time to help with fee demand assessment	0.5	\$605.00	\$302.50

10/27/2017	Dave	Stein	continue to compile lodestar information; confer with liaison counsel, E Gibbs re same	0.3	\$605.00	\$181.50
10/27/2017	Dave	Stein	email defense counsel re status of client review of settlement docs	0.1	\$605.00	\$60.50
10/27/2017	Eric	Gibbs	review status of settlement, c/w Mallow re same	0.7	\$805.00	\$563.50
10/30/2017	Caroline	Corbitt	Review last case order for settlement talks deadlines.	0.1	\$365.00	\$36.50
10/30/2017	Dave	Stein	work with E Gibbs on issues relating to settlement finalization, fee demand; confer with E Gibbs, M Troutman re same, re next steps	0.6	\$605.00	\$363.00
10/30/2017	Eric	Gibbs	c/w P team re status of settlement, ongoing discussions, review lodestar breakdowns	0.6	\$805.00	\$483.00
11/1/2017	Dave	Stein	prepare for, participate in, call with M McMorro, E Turin re settlement, next steps	0.6	\$605.00	\$363.00
11/1/2017	Eric	Gibbs	prep and telephone conversation with other plaintiffs' counsel re settlement	0.7	\$805.00	\$563.50
11/2/2017	Dave	Stein	review and revise draft joint statement and confer with M Troutman re revisions to same	0.2	\$605.00	\$121.00
11/2/2017	Dave	Stein	email B Bell re CRV settlement status	0.1	\$605.00	\$60.50
11/8/2017	Dave	Stein	call with liaison counsel for debriefing on past status conference and to update on status of settlement finalization	0.4	\$605.00	\$242.00
11/8/2017	Eric	Gibbs	c/w Greg and Mark re Monday's hearing, status of various plaintiffs	0.4	\$805.00	\$322.00
11/13/2017	Dave	Stein	review L Kiser email re settlement notice documents; review settlement agreement requirements for same; confer with E Gibbs re same	0.3	\$605.00	\$181.50
11/13/2017	Eric	Gibbs	review Liv email and underlying settlement agreement provisions, c/w DS re same	0.5	\$805.00	\$402.50
11/14/2017	Dave	Stein	further review/revision of settlement agreement toward finalization; confer with E Gibbs, liaison counsel re same	0.4	\$605.00	\$242.00
11/14/2017	Eric	Gibbs	review revised SA, c/w D Stein re same, draft email and circulate	0.4	\$805.00	\$322.00
11/16/2017	Dave	Stein	review and revise joint status report draft	0.3	\$605.00	\$181.50
11/17/2017	Dave	Stein	review defense edits to joint statement; confer with M Troutman re same, Monday's hearing	0.3	\$605.00	\$181.50
11/20/2017	Dave	Stein	prepare for status conference; confer with liaison counsel, E Gibbs re same; participate in status conference	0.7	\$605.00	\$423.50
11/20/2017	Eric	Gibbs	prepare for and participate in CMC	0.8	\$805.00	\$644.00
11/27/2017	Caroline	Corbitt	Review and compare six settlement-related documents sent by Honda to prior versions. Email D. Stein and E. Gibbs re: same.	0.4	\$365.00	\$146.00
11/28/2017	Dave	Stein	review defendants' revisions to settlement agreement, supporting documents; further revisions to same; confer with E Gibbs, liaison counsel re same	0.9	\$605.00	\$544.50

11/29/2017	Dave	Stein	further revise settlement agreement and exhibits; email L Kiser re same	0.5	\$605.00	\$302.50
11/30/2017	Dave	Stein	review Honda edits to proposed PA order, proposed injunction order, and settlement agreement; revise; confer with E Gibbs, liaison counsel re same; email L Kiser re same	2.6	\$605.00	\$1,573.00
11/30/2017	Eric	Gibbs	review Liv's edits and D Stein response; tweak and approve same	0.7	\$805.00	\$563.50
12/1/2017	Dave	Stein	review and revise preliminary approval motion to conform to latest developments; confer with team re same	0.6	\$605.00	\$363.00
12/4/2017	Dave	Stein	schedule call with liaison counsel re upcoming hearing; review recent changes to documents; prepare for, participate in call; email defense counsel re same	0.5	\$605.00	\$302.50
12/5/2017	Dave	Stein	review Winkel declaration exhibit to settlement agreement; emails with defense counsel, liaison counsel re same and re other settlement documents and re Thursday status hearing	1.1	\$605.00	\$665.50
12/6/2017	Dave	Stein	review Honda edits to settlement agreement, proposed orders; review MOU, prior versions of same; prepare to confer with defense counsel re same; confer with defense counsel, co-counsel; joint call to chambers re same	1.6	\$605.00	\$968.00
12/7/2017	Caroline	Corbitt	Email plaintiff Bakh Inamov re: settlement status.	0.1	\$365.00	\$36.50
12/7/2017	Caroline	Corbitt	Call plaintiffs Michelle and Robert Bergendhal re: settlement status.	0.2	\$365.00	\$73.00
12/7/2017	Caroline	Corbitt	Call plaintiff Robert Fennes re: settlement status.	0.2	\$365.00	\$73.00
12/7/2017	Caroline	Corbitt	Call plaintiff Michael Stanley re: settlement status.	0.2	\$365.00	\$73.00
12/7/2017	Caroline	Corbitt	Call plaintiff Julia Hsi re: settlement status.	0.1	\$365.00	\$36.50
12/7/2017	Caroline	Corbitt	Call plaintiff Bob Nonni re: settlement status.	0.1	\$365.00	\$36.50
12/8/2017	Dave	Stein	prepare email memo to E Gibbs re open issues in settlement negotiations and talking points for same	0.6	\$605.00	\$363.00
12/11/2017	Dave	Stein	confer with liaison counsel re status of settlement discussions	0.1	\$605.00	\$60.50
12/15/2017	Dave	Stein	Prepare for call with defense counsel re negotiations and finalization of settlement papers; confer with E Gibbs re same	0.9	\$605.00	\$544.50
12/15/2017	Eric	Gibbs	prepare for and c/w Mallow and Liv	0.7	\$805.00	\$563.50
12/19/2017	Dave	Stein	call with liaison counsel re latest settlement discussions with Honda	0.3	\$605.00	\$181.50
12/19/2017	Eric	Gibbs	c/w co-counsel re status	0.3	\$805.00	\$241.50
12/20/2017	Dave	Stein	work with team, co-counsel on fee mediation next steps	0.2	\$605.00	\$121.00
12/22/2017	Dave	Stein	review updated settlement agreement and related docs sent by defense counsel; further revise same; email defense counsel	1.6	\$605.00	\$968.00
1/4/2018	Dave	Stein	confer with M Troutman re calling chambers to update on settlement	0.1	\$605.00	\$60.50
1/5/2018	Caroline	Corbitt	Review draft settlement agreement signature block for accuracy, checking complaint and docket. Email D. Stein re: same.	0.5	\$365.00	\$182.50

1/5/2018	Dave	Stein	confer with opposing counsel, liaison counsel re finalizing settlement, calling chambers	0.2	\$605.00	\$121.00
1/5/2018	Dave	Stein	final proofread, etc., of settlement agreement and all supporting documents	4.2	\$605.00	\$2,541.00
1/9/2018	Dave	Stein	email with L Kiser and review attachments related to finalizing settlement	0.2	\$605.00	\$121.00
1/12/2018	Caroline	Corbitt	Review details of upcoming mediation and email D. Stein re: deadlines.	0.2	\$365.00	\$73.00
1/12/2018	Dave	Stein	review Honda further edits to settlement agreement; further revise same; emails with co-counsel, defense counsel re same; confer with C Corbitt re circulating for signatures	0.9	\$605.00	\$544.50
1/13/2018	Caroline	Corbitt	Review and finalize settlement agreement and exhibits. Compile documents to be sent to plaintiffs for review and execution. Email D. Stein and E. Gibbs re: same.	1.4	\$365.00	\$511.00
1/13/2018	Dave	Stein	work with C Corbitt on getting signatures on settlement agreement	0.1	\$605.00	\$60.50
1/15/2018	Caroline	Corbitt	Leave voicemails for plaintiffs re: settlement agreement.	0.3	\$365.00	\$109.50
1/15/2018	Caroline	Corbitt	Email co-counsel Mark Troutman re: final settlement agreement.	0.1	\$365.00	\$36.50
1/16/2018	Caroline	Corbitt	Email D. Stein re: Ex F to Settlement Agreement.	0.1	\$365.00	\$36.50
1/16/2018	Caroline	Corbitt	Call and email plaintiff re: settlement agreement execution.	1.1	\$365.00	\$401.50
1/16/2018	Dave	Stein	confer with team re finalization of settlement; emails to B Bell and M Donovan re same	0.2	\$605.00	\$121.00
1/16/2018	Dave	Stein	final review of Exhibit F to the settlement agreement; confer with C Corbitt, L Kiser re same	0.3	\$605.00	\$181.50
1/17/2018	Caroline	Corbitt	Email and call plaintiffs re: settlement agreement.	0.4	\$365.00	\$146.00
1/17/2018	Caroline	Corbitt	Email update on plaintiff signatures to D. Stein and E. Gibbs.	0.1	\$365.00	\$36.50
1/18/2018	Caroline	Corbitt	Email D. Stein and E. Gibbs re: plaintiffs.	0.1	\$365.00	\$36.50
1/18/2018	Caroline	Corbitt	Email co-counsel Mark Troutman re: plaintiff signatures to settlement agreement.	0.1	\$365.00	\$36.50
1/18/2018	Caroline	Corbitt	Call plaintiff Robert Fennes.	0.1	\$365.00	\$36.50
1/18/2018	Dave	Stein	confer with M Troutman re preliminary approval brief	0.1	\$605.00	\$60.50
1/19/2018	Caroline	Corbitt	Email team several times re: receipt of settlement agreement signature pages from plaintiffs.	0.2	\$365.00	\$73.00
1/19/2018	Dave	Stein	confer with team re status of obtaining settlement signatures	0.1	\$605.00	\$60.50
1/19/2018	Dave	Stein	review S Judge edits to preliminary approval motion and further revise same	0.4	\$605.00	\$242.00
1/22/2018	Caroline	Corbitt	CW D. Stein re: plaintiff sign off on settlement.	0.1	\$365.00	\$36.50
1/22/2018	Caroline	Corbitt	Leave voicemail for plaintiff re: settlement signature.	0.1	\$365.00	\$36.50
1/22/2018	Dave	Stein	confer with co-counsel re preliminary approval filing	0.1	\$605.00	\$60.50

1/24/2018	Caroline	Corbitt	Call and email plaintiff several times re: signature to settlement agreement. Update team re: same.	0.3	\$365.00	\$109.50
1/25/2018	Caroline	Corbitt	Email team re: plaintiff settlement sign off.	0.1	\$365.00	\$36.50
1/25/2018	Caroline	Corbitt	Email D. Stein re: exhibit to settlement agreement.	0.1	\$365.00	\$36.50
1/25/2018	Caroline	Corbitt	Email plaintiffs re: settlement agreement.	0.1	\$365.00	\$36.50
1/25/2018	Dave	Stein	confer with liaison counsel re status of preliminary approval filing; email defense counsel re signatures; further revise preliminary approval brief and circulate to defense counsel	0.7	\$605.00	\$423.50
1/30/2018	Dave	Stein	review draft mediation brief; suggest revisions to same	0.5	\$605.00	\$302.50
1/31/2018	Dave	Stein	continue review of draft mediation brief; confer with E Gibbs re same; revise same	2.2	\$605.00	\$1,331.00
2/1/2018	Dave	Stein	confer with liaison counsel re mediation brief, further revise same	0.4	\$605.00	\$242.00
2/7/2018	Caroline	Corbitt	Review all records of discovery served on Honda and email E. Gibbs re: same.	0.2	\$365.00	\$73.00
2/7/2018	Eric	Gibbs	travel to Ohio for mediation	5.5	\$805.00	\$4,427.50
2/8/2018	Dave	Stein	emails, call with E Gibbs, liaison counsel during mediation to assist with same	0.7	\$605.00	\$423.50
2/8/2018	Eric	Gibbs	prepare for and participate in fee mediation	7.1	\$805.00	\$5,715.50
2/14/2018	Dave	Stein	prepare for and participate in call with plaintiffs' counsel Turin and McMorrow re settlement; confer with E Gibbs re same, other next steps in preliminary approval	0.7	\$605.00	\$423.50
2/14/2018	Dave	Stein	email defense counsel re draft preliminary approval brief	0.1	\$605.00	\$60.50
2/14/2018	Eric	Gibbs	prep and c/w with other plaintiffs' counsel re settlement status	0.7	\$805.00	\$563.50
3/5/2018	Dave	Stein	call with other plaintiffs' lawyers re settlement; confer with E Gibbs, M Troutman re same	0.4	\$605.00	\$242.00
3/5/2018	Eric	Gibbs	prepare for and t/c with McMorrow and Eugene re status of plaintiffs re proposed settlement; t/c w/ M. Troutman re same	0.8	\$805.00	\$644.00
3/6/2018	Dave	Stein	email defense counsel re preliminary approval brief	0.1	\$605.00	\$60.50
3/6/2018	Jason	Gibbs	calls with class members re status of case, update firm data base	0.7	\$190.00	\$133.00
3/20/2018	Caroline	Corbitt	Answer phone call from plaintiff.	0.2	\$365.00	\$73.00
3/22/2018	Caroline	Corbitt	Respond to email from plaintiff.	0.1	\$365.00	\$36.50
3/30/2018	Caroline	Corbitt	Leave message for plaintiff.	0.1	\$365.00	\$36.50
4/2/2018	Caroline	Corbitt	Call with plaintiff Robert Fennes.	0.2	\$365.00	\$73.00
4/2/2018	Dave	Stein	confer with team re status of preliminary approval filing	0.1	\$605.00	\$60.50
4/4/2018	Dave	Stein	confer with M Troutman, E Gibbs re preliminary approval; strategize re same; edit preliminary approval brief to update for filing	0.5	\$605.00	\$302.50
4/5/2018	Jason	Gibbs	calls with potential class members	0.1	\$190.00	\$19.00

4/6/2018	Dave	Stein	email from M Troutman re court request for update	0.1	\$605.00	\$60.50
4/6/2018	Dave	Stein	emails with M Mallow re preliminary approval	0.1	\$605.00	\$60.50
4/9/2018	Jason	Gibbs	calls with potential class members	0.1	\$190.00	\$19.00
4/10/2018	Jason	Gibbs	calls with potential class members	0.5	\$190.00	\$95.00
4/11/2018	Dave	Stein	email with defense counsel re non-response to PA papers	0.1	\$605.00	\$60.50
4/12/2018	Dave	Stein	review defense edits to preliminary approval brief; further review and revise same; confer with E Gibbs re same	1	\$605.00	\$605.00
4/13/2018	Dave	Stein	confer with M Troutman, E Gibbs re preliminary approval brief; further review of same	0.8	\$605.00	\$484.00
4/18/2018	Jason	Gibbs	calls with potential class members	0.4	\$190.00	\$76.00
4/24/2018	Caroline	Corbitt	Review settlement agreement for consistency/errors and CW D. Stein re: same. Review/edit text and citations of preliminary settlement approval motion and Gibbs declaration. Compile exhibits to Gibbs declaration.	4.2	\$365.00	\$1,533.00
4/24/2018	Dave	Stein	review latest edits to preliminary approval brief; confer with E Gibbs and co-counsel re same; compile and final review of brief, settlement agreement, all exhibits, proposed order, etc. for filing	2.6	\$605.00	\$1,573.00
4/25/2018	Dave	Stein	review co-counsel edits to various settlement documents and assist in finalization of same	0.3	\$605.00	\$181.50
4/26/2018	Jason	Gibbs	calls with class members updating status of case, update firm data base	0.3	\$190.00	\$57.00
4/27/2018	Dave	Stein	emails with defense counsel re preliminary approval filing; confer with team, M Troutman re same; oversee filing	0.5	\$605.00	\$302.50
5/3/2018	Caroline	Corbitt	Respond to email from plaintiff.	0.1	\$365.00	\$36.50
5/3/2018	Jason	Gibbs	calls with potential class members	0.8	\$190.00	\$152.00
5/8/2018	Jason	Gibbs	calls with potential class members	0.9	\$190.00	\$171.00
5/9/2018	Jason	Gibbs	call with potential class member re status of case	0.1	\$190.00	\$19.00
5/10/2018	Caroline	Corbitt	Review and summarize over 500 internal records of individuals complaining about vibration records for settlement notices and settlement approval briefing	3.2	\$365.00	\$1,168.00
5/10/2018	Jason	Gibbs	calls with potential class members	0.5	\$190.00	\$95.00
5/14/2018	Caroline	Corbitt	Review and compile complaints from NHTSA, CarComplaints, and Consumer Affairs for memo iso final settlement approval. Email to D. Stein and E. Gibbs.	3.2	\$365.00	\$1,168.00
5/15/2018	Jason	Gibbs	calls with potential class members	0.5	\$190.00	\$95.00
5/16/2018	Jason	Gibbs	calls with potential class members	1.4	\$190.00	\$266.00
5/21/2018	Dave	Stein	confer with liaison counsel, re final approval and fee application	0.2	\$605.00	\$121.00
5/22/2018	Jason	Gibbs	calls with potential class members	0.2	\$190.00	\$38.00

5/29/2018	Jason	Gibbs	calls with potential class members	0.1	\$190.00	\$19.00
5/31/2018	Jason	Gibbs	calls with potential class members	1	\$190.00	\$190.00
6/4/2018	Dave	Stein	emails M Troutman re next filings; review settlement agreement for upcoming deadlines for Honda to implement settlement program; strategize re next steps	0.3	\$605.00	\$181.50
6/5/2018	Dave	Stein	prepare for, participate in, strategy call with liaison counsel re final approval and fee motions	1	\$605.00	\$605.00
6/7/2018	Dave	Stein	emails, call with M Shortnacy re settlement	0.3	\$605.00	\$181.50
6/11/2018	Dave	Stein	confer with liaison counsel re settlement deadlines	0.1	\$605.00	\$60.50
6/12/2018	Dave	Stein	email defense counsel re failure to provide web protocol	0.1	\$605.00	\$60.50
6/13/2018	Caroline	Corbitt	CW D Stein re mailing list for settlement letter	0.1	\$365.00	\$36.50
6/13/2018	Dave	Stein	confer with C Corbitt re compiling mailing list for letter required by settlement	0.1	\$605.00	\$60.50
6/13/2018	Dave	Stein	review correspondence from M Shortnacy re ownerlink settlement notice placement; reference settlement agreement re same; explore ownerlink website to understand placement of link; email E Gibbs, M Troutman re same and respond to M Shortnacy	0.8	\$605.00	\$484.00
6/14/2018	Dave	Stein	email defense counsel re failure to provide us optimization protocol	0.1	\$605.00	\$60.50
6/15/2018	Dave	Stein	emails with defense counsel re missing internet protocol	0.1	\$605.00	\$60.50
6/18/2018	Dave	Stein	confer with liaison counsel re Honda missed deadline under settlement agreement and strategize re next steps	0.2	\$605.00	\$121.00
6/18/2018	Dave	Stein	emails with defense counsel re settlement implementation; prep and hold call with defense counsel re same; follow up call with liaison counsel to discuss various issues (notices, ownerlink link placement, web optimization protocol) discussed with defense counsel and to plan position re same	1.4	\$605.00	\$847.00
6/20/2018	Dave	Stein	emails with, prepare for, call with, defense counsel re settlement website, notice issues; call to M Troutman re same	0.5	\$605.00	\$302.50
6/22/2018	Dave	Stein	emails, calls to defense counsel about missing web protocol, placement of Owner Link links; call with M Shortnacy re same; email M Troutman re same	0.5	\$605.00	\$302.50
6/22/2018	Dave	Stein	work on issues relating to settlement webpage, notice	0.5	\$605.00	\$302.50
6/25/2018	Caroline	Corbitt	Draft revised version of case website; send to D. Stein for his review.	0.6	\$365.00	\$219.00
6/25/2018	Caroline	Corbitt	Assist in sending mass settlement notice	0.3	\$365.00	\$109.50
6/25/2018	Caroline	Corbitt	Update calls to class representatives.	1.2	\$365.00	\$438.00

6/25/2018	Dave	Stein	monitor settlement webpages and check google search results for same; emails with defense counsel re nonfunctioning URL; call with defense counsel re same	0.7	\$605.00	\$423.50
6/25/2018	Dave	Stein	review/revise update to webpage for information to class members about the settlement and oversee dissemination of settlement letter per settlement agreement	0.9	\$605.00	\$544.50
6/25/2018	Dave	Stein	begin preparing thorough fee application declaration re lodestar, time spent on various activities throughout case; review docket, underlying documents for same; confer with G Munroe re fee application	4.6	\$605.00	\$2,783.00
6/25/2018	Geoffrey	Munroe	Review case file, legal research re fees, and call with D Stein re fee briefing	0.7	\$660.00	\$462.00
6/26/2018	Caroline	Corbitt	Email several times and CW D. Stein re settlement notice to class members.	0.4	\$365.00	\$146.00
6/26/2018	Caroline	Corbitt	Calls with class members re: settlement.	1.3	\$365.00	\$474.50
6/26/2018	Dave	Stein	emails with defense counsel re settlement website; call with liaison counsel re status of various settlement deadlines, activities	0.2	\$605.00	\$121.00
6/26/2018	Dave	Stein	confer with C Corbitt re responses to settlement notices from class members	0.3	\$605.00	\$181.50
6/26/2018	Dave	Stein	call with M Shortnacy re settlement notices, final approval; email M Troutman re same	0.2	\$605.00	\$121.00
6/26/2018	Dave	Stein	continue preparing declaration ISO fee application; confer with E Gibbs, M Troutman, K Gilbride re coordination of fee application	3.8	\$605.00	\$2,299.00
6/26/2018	Steve	Lopez	Draft outline of final approval motion; review settlement papers and briefing in detail to draft same; begin initial draft of motion	3.4	\$415.00	\$1,411.00
6/27/2018	Caroline	Corbitt	Calls with class members re: settlement.	1.4	\$365.00	\$511.00
6/27/2018	Caroline	Corbitt	Respond to D. Stein questions re: case background; review records re: same for fee application	0.6	\$365.00	\$219.00
6/27/2018	Dave	Stein	call with K Gilbride re fee declaration/application; confer with M Troutman re same, next steps	0.2	\$605.00	\$121.00
6/27/2018	Dave	Stein	confer with liaison counsel re retention of expert for fee application	0.1	\$605.00	\$60.50
6/27/2018	Dave	Stein	continue preparing detailed fee declaration	4.2	\$605.00	\$2,541.00
6/27/2018	Steve	Lopez	continue preparing final approval brief	6.3	\$415.00	\$2,614.50
6/28/2018	Caroline	Corbitt	Calls with class members re: settlement.	0.6	\$365.00	\$219.00
7/2/2018	Dave	Stein	emails with defense counsel re call to discuss settlement / approval issues	0.1	\$605.00	\$60.50
7/2/2018	Geoffrey	Munroe	Work on fee memorandum, including supporting legal research, outlining, and incorporating factual sections	5.2	\$660.00	\$3,432.00

7/3/2018	Dave	Stein	Prepare for and call with fee expert; confer with team re same; email expert	0.5	\$605.00	\$302.50
7/3/2018	Geoffrey	Munroe	Work on memorandum in support of fee application, including research of hours and rates in recent auto class action, calls with D Stein to answer questions and discuss fee app	6.8	\$660.00	\$4,488.00
7/4/2018	Geoffrey	Munroe	Continue drafting memorandum in support of motion for attorney fees	3.9	\$660.00	\$2,574.00
7/5/2018	Dave	Stein	work with liaison counsel on issues relating to fee application and expert	0.1	\$605.00	\$60.50
7/5/2018	Dave	Stein	review/revise draft motion ISO final approval	2.2	\$605.00	\$1,331.00
7/5/2018	Geoffrey	Munroe	Continued drafting memo in support of fee application	5.7	\$660.00	\$3,762.00

EXHIBIT B



Firm Resume

Gibbs Law Group is a national litigation firm representing plaintiffs in class and collective actions in state and federal courts, and in arbitration matters worldwide. The firm serves clients in securities and financial fraud, antitrust, consumer protection, whistleblower, personal injury, and employment cases. We are committed to achieving favorable results for all of our clients in the most expeditious and economical manner possible.

The firm regularly prosecutes multi-state class actions and has one of the best track records in the country when it comes to successfully certifying classes, developing practical damages methodologies, obtaining prompt relief for class members victimized by unlawful practices, and working cooperatively with other firms.

Our attorneys take pride in their ability to simplify complex issues; willingness to pursue narrow and innovative legal theories; ability to work cooperatively with other plaintiffs' firms; and desire to outwork and outlast well-funded defense teams.

As a result, our attorneys are frequently recognized by the courts, our peers, and the legal media for their ability to provide the highest caliber of legal service. Eric Gibbs was listed among the *Daily Journal's* "Top 30 Plaintiff Lawyers in California for 2016," named *Law360's* "2016 Consumer Protection MVP," and included among the "Top 100 Super Lawyers" in Northern California. Mr. Gibbs has also been named in *The Best Lawyers in America* (2012-2016) for his work in Mass Tort Litigation/Class Actions, and was featured as one of San Francisco's Top AV-Preeminent Rated Lawyers. Many of our attorneys are recognized annually as Northern California *Super Lawyers* and *Rising Stars*.

ATTORNEYS

Partners

<i>Eric Gibbs</i>	p. 2
<i>David Berger</i>	p. 4
<i>Dylan Hughes</i>	p. 5
<i>Karen Barth Menzies</i>	p. 6
<i>Geoffrey Munroe</i>	p. 7
<i>Andre Mura</i>	p. 8
<i>Michael Schrag</i>	p. 10
<i>David Stein</i>	p. 12
<i>Steven Tindall</i>	p. 14
<i>Amy Zeman</i>	p. 15

Of Counsel

<i>A.J. De Bartolomeo</i>	p. 17
<i>John Kehoe</i>	p. 19
<i>Robert Mosier</i>	p. 20
<i>Michael Yarnoff</i>	p. 21

Associates

<i>Joshua Bloomfield</i>	p. 22
<i>Aaron Blumenthal</i>	p. 22
<i>Caroline Corbitt</i>	p. 22
<i>Amanda Karl</i>	p. 22
<i>Linda Lam</i>	p. 22
<i>Steve Lopez</i>	p. 23

SIGNIFICANT RECOVERIES

<i>Securities & Financial Fraud</i>	p. 23
<i>Antitrust & Unfair Business Practices</i>	p. 25
<i>Mass Tort</i>	p. 27
<i>Deceptive Marketing</i>	p. 27
<i>Data Breach/Privacy</i>	p. 29
<i>Defective Products</i>	p. 30
<i>Government Reform</i>	p. 31

Partners



505 14th Street
Suite 1110
Oakland, CA 94612
T 510.350.9700
F 510.350.9701
ehg@classlawgroup.com

Practice Emphasis

Antitrust & Unfair Competition
Banking and Financial Fraud
Class Actions
Consumer Protection
Employment Law
Mass Personal Injury
Whistleblower

Education

Seattle University School of
Law, J.D., 1995

San Francisco State
University, B.A., 1991

Admissions

California

Awards & Honors

Consumer Protection MVP,
Law 360, 2016

*Top 30 Plaintiff Lawyers in
California for 2016* by the
Daily Journal

*Best Lawyers in America for
Class Actions/ Mass Tort
Litigation (2012-2016)*

*AV Preeminent® Peer
Review Rated by Martindale-
Hubbell*

*Top 100 Super Lawyers in
Northern California (2010 -
2018)*

Eric H. Gibbs | Partner

Eric Gibbs prosecutes antitrust, consumer protection, whistleblower, financial fraud and mass tort matters. He has been appointed to leadership positions in dozens of contested, high profile class actions and coordinated proceedings, and currently serves in leadership positions in *In re Equifax, Inc. Customer Data Security Breach Litigation*, *In re Am. Honda Motor CR-V Vibration Litigation*, *In re: Wells Fargo Auto Insurance Marketing and Sales Practices Litigation*, *In re Anthem, Inc. Data Breach Litigation*, *In re Risperdal and Invega Product Liability Cases*, *In re Hyundai Sonata Engine Litigation*, *In re Vizio, Inc., Consumer Privacy Litigation* and *In re Banner Health Data Breach Litigation*. Eric has recovered nearly a billion dollars for the clients and classes he represents, and has negotiated groundbreaking settlements that resulted in meaningful reforms to business practices, and have favorably impacted plaintiffs' legal rights.

Reputation and Recognition by the Courts

In over twenty years of practice, Eric has developed a distinguished reputation with his peers and the judiciary for his ability to work efficiently and cooperatively with co-counsel, and professionally with opposing counsel in class action litigation.

"[Mr. Gibbs] efficiently managed the requests from well over 20 different law firms and effectively represented the interests of Non-Settling Plaintiffs throughout this litigation."

- Hon. G. Wu, *In re Hyundai & Kia Fuel Economy Litig.* (C.D. Cal)

"The attorneys who handled the case were particularly skilled by virtue of their ability and experience."

- Hon. D. Debevoise, *In re: Mercedes-Benz Teleaid Contract Litig.* (D. N.J.)

"They are experienced and knowledgeable counsel and have significant breadth of experience in terms of consumer class actions."

- Hon. R. Sabraw, *Mitchell v. Am. Fair Credit Assoc'n* (Alameda Cty. Superior Ct.)

"Representation was professional and competent; in the Court's opinion, counsel obtained an excellent result for the class."

- Hon. J. Fogel, *Sugarman v. Ducati N. Am.* (N.D. Cal)

Achievements and Leadership

Eric has been widely recognized for his professional excellence and achievements, and has been selected by numerous publications as a leading lawyer in the field of Class and Mass Actions. The *Daily Journal* named Eric to its prestigious list of "Top Plaintiff Lawyers in California" for 2016. Consumer Attorneys of California selected Eric and co-counsel as finalists for *Consumer Attorney of the Year* for their work in achieving \$100 million settlement in the Chase "Check Loan" Litigation. His cases have been chronicled in major legal and news publications including *NBC News*, *CNN*, the *National Law Journal*, *The New York Times*, *Auto Week*, *Market Watch*, and *Bloomberg News*. Eric holds a variety of leadership positions in professional associations for consumer advocacy, and he is frequently presents on developing trends in the law at conferences throughout the country.

Litigation Highlights

In re Chase Bank U.S.A., N.A. "Check Loan" Contract Litigation – multidistrict litigation that alleged Chase Bank wronged consumers by offering long-term fixed-rate loans, only to later more-than-double the required loan payments. Eric led negotiations in the case, which resulted in a \$100 million settlement with Chase eight weeks prior to trial.

In re Adobe Systems Inc. Privacy Litigation – As court-appointed lead counsel, Eric and his team reversed a long line of decisions adverse to consumers whose personal information was stolen in data breaches. Judge Koh issued a 41 page decision in plaintiffs' favor and Eric negotiated a comprehensive reform of Adobe's data security practices. The court's landmark decision on Article III standing in this case marked a sea change and has been cited favorably in over twenty cases in the year since it was issued.

In re Hyundai & Kia Fuel Econ. Litigation – As court-appointed liaison counsel, Eric reconciled the plaintiffs' interests and coordinated discovery and settlement negotiations. He helped finalize a settlement with an estimated value of up to \$360 million.

Skold v. Intel Corp. – After more than a decade of litigation, Eric as lead counsel achieved a nationwide class action settlement on behalf of approximately 5 million consumers of Intel Pentium 4 processors. The lawsuit changed Intel's benchmarking practices and Intel agreed to a cash settlement for the class, along with \$4 million in charitable donations.

Parkinson v. Hyundai Motor America – Eric served as class counsel in this lawsuit alleging that the flywheel and clutch system in certain Hyundai vehicles was defective. After achieving nationwide class certification, Hyundai agreed to a settlement that provided for 50-100% reimbursements to class members for their repairs and full reimbursement for rental vehicle expenses.

De La Cruz v. Masco Retail Cabinet Group – Eric served as lead attorney litigating the collective claims of dozens of misclassified account representatives for overtime pay under the Fair Labor Standards Act (FLSA). Successfully certified a class of current and former Masco account representatives and personally arbitrated the case to judgment obtaining full recovery for the class.

In re Providian Credit Card Cases – Eric played a prominent role in this nationwide class action suit brought on behalf of Providian credit card holders alleging that Providian engaged in unlawful and fraudulent business practices in connection with the marketing and fee assessments for its credit cards. The Honorable Stuart Pollack approved a \$105 million settlement, plus injunctive relief—one of the largest class action recoveries in the United States arising out of consumer credit card litigation.

Professional Affiliations

American Association for Justice- Board of Governors; Co-chair Consumer Privacy and Data Breach Litigation Group; Co-founder and past co-chair of AAJ Litigation Group, past editor of Class Action Litigation Group newsletter; creator and current chair of Class Action Litigation Group objector database and task force.

Association of Business Trial Lawyers

Consumer Attorneys of California- Board of Governors

National Association of Consumer Advocates

Pound Civil Justice Institute - Fellow

Public Justice Foundation- Class Action Preservation Project Committee

San Francisco Trial Lawyers Association



David M. Berger | Partner

David Berger represents plaintiffs in class actions with a special emphasis on data breach, privacy, and health care litigation. Mr. Berger has represented plaintiffs in complex lawsuits following some of the nation's largest retail and healthcare data breaches, including litigation against Adobe, Anthem, Home Depot, Experian, and Excellus BlueCross BlueShield, among others. Prior to joining Gibbs Law Group, Mr. Berger was a law clerk in the Northern District of California, litigation counsel for the Economic Community of West African States, and an associate at Robins, Kaplan, Miller, and Ciresi.

505 14th Street
Suite 1110
Oakland, CA 94612
T 510.350.9700
F 510.350.9701
dmb@classlawgroup.com

Practice Emphasis

Class Actions
Consumer Protection
Privacy

Education

J.D., Northwestern University
School of Law, 2008

B.A., University of Wisconsin,
Madison, 1998

Admissions

California

Representative Work

In re Anthem, Inc. Data Breach Privacy Litigation – Key member of the litigation team representing interests of plaintiffs and putative class members following massive data breach of approximately 80 million personal records, including names, dates of birth, Social Security numbers, health care ID numbers, email and physical addresses, employment information, and income data.

Fero v. Excellus Health Plan Inc. – Key member of the litigation team representing the interests of 7 million Excellus health plan subscribers and 3.5 million Lifetime subscribers whose personal and medical information was compromised.

In re Adobe Systems Inc. Privacy Litigation – Key member of the litigation team that succeeded in reversing a long line of decisions adverse to consumers whose personal information was stolen in data breaches. Judge Koh issued a 41-page decision in plaintiffs' favor and the settlement resulted in a comprehensive reform of Adobe's data security practices. The court's landmark decision on Article III standing in this case marked a sea change and has been cited favorably in over twenty cases in the year since it was issued.

Awards & Honors

Named a Northern California "Rising Star" by Super Lawyers (2016- 2018)

Professional Affiliations

American Association for Justice
Consumer Attorneys of California

Presentations and Publications

Presenter, "Hot Topics in Consumer Class Actions Against Insurers: Filed Rate Doctrine, Standing, and Reverse Preemption of RICO Claims," Sacramento California Insurance Regulation and Litigation Seminar, Clyde & Co., March 2018.

Presenter, "Winning strategies in privacy and data security class actions: the plaintiffs' perspective," Berkeley Center for Law & Technology, Boalt Hall School of Law, January 2017.

Presenter, "Don't be Spokeo'd: What You Need to Know in Litigating Data Breach Cases (from breach to remedies)," ABA Business Law Section Annual Meeting, September 8, 2016.

Presenter, "Developments in 'E-Commerce' Class Actions and Privacy Law," Perrin Class Action Litigation Conference, May 16, 2016.

Presenter, "Data Breach Class Action Litigation," Mass Torts Made Perfect Conference, April 22, 2016.



Dylan Hughes | Partner

Dylan Hughes concentrates his practice on investigating and prosecuting fraud matters on behalf of whistleblowers, consumers and employees who have been harmed by corporate misconduct. He coordinates initial case evaluations and analyses in a variety of practice areas and has substantial experience in matters involving health care fraud, particularly in the Medicare and pharmaceutical contexts. Dylan represents consumers in cases ranging from false advertising to defective products, and employees in misclassification and wage and hour cases under state and federal laws.

Mr. Hughes has extensive experience prosecuting complex personal injury cases. He helped to obtain millions of dollars for women who suffered blood clots and other serious injuries after taking birth control pills. He has also represented clients injured by defective medical devices, including defibrillators, blood filters, as well as back pain implants. Mr. Hughes was part of the team that recently settled a case alleging medical malpractice for a spinal surgery that resulted in partial paralysis.

Mr. Hughes began his career as a law clerk for the Honorable Paul A. Mapes, Administrative Law Judge of the Office of Administrative Law Judges, United States Department of Labor. He is a member of the American Bar Association, Consumer Attorneys of California, American Association for Justice Class Action Litigation Group and the Consumer Rights Section of the Barristers Club.

505 14th Street
Suite 1110
Oakland, CA 94612
T 510.350.9700
F 510.350.9701
dsh@classlawgroup.com

Practice Emphasis

Class Actions
Consumer Protection
Employment Law
Whistleblower

Education

University of California,
Hastings College of Law, J.D.,
2000

University of California at
Berkeley, B.A., 1995

Admissions

California

Litigation Highlights

Skold v. Intel Corp. – Key member of the legal team in this decade-long litigation that achieved a nationwide class action settlement on behalf of approximately 5 million consumers of Intel Pentium 4 processors. The lawsuit changed Intel’s benchmarking practices and Intel agreed to a cash settlement for the class, along with \$4 million in charitable donations.

In re Adobe Systems Inc. Privacy Litigation – Key member of the litigation team that succeeded in reversing a long line of decisions adverse to consumers whose personal information was stolen in data breaches. Judge Koh issued a 41-page decision in plaintiffs’ favor and the settlement resulted in a comprehensive reform of Adobe’s data security practices. The court’s landmark decision on Article III standing in this case marked a sea change and has been cited favorably in over twenty cases in the year since it was issued.

Velasco v. Chrysler Group LLP – represented consumers who alleged they were sold and leased vehicles with defective power control modules that caused vehicle stalling. In addition to negotiating a recall of all 2012-13 Jeep Grand Cherokee and Dodge Durango vehicles, the lawsuit also resulted in Chrysler reimbursing owners for all repair and rental car expenses, and extending its warranty.

Parkinson v. Hyundai Motor America – certified a nationwide class alleging Hyundai sold vehicles with defective flywheel systems, before ultimately reaching a favorable settlement for the class

Awards & Honors

Northern California Super Lawyer (2012-2018)

Professional Affiliations

Consumer Attorneys of California
American Association for Justice- Class Action Litigation Group
American Bar Association



Karen Barth Menzies | Partner

Karen is a nationally-recognized mass tort attorney with more than twenty years of experience in federal and state litigation. Courts throughout the country have appointed Karen to serve in leadership positions including Lead Counsel, Liaison Counsel and Plaintiff Steering Committee in some of the largest pharmaceutical and device mass tort cases. Karen currently serves in leadership positions in the Zolofit Birth Defect Litigation (federal and California state courts), Transvaginal Mesh Litigation (federal and California state courts), Fosamax Femur Fracture Litigation (California state court), Lexapro/Celexa Birth Defect Litigation (Missouri state court).

Karen is particularly focused on women's health issues and drugs that cause harm to children. She currently serves as co-lead counsel in the *In re Taxotere (Docetaxel) Products Liability Litigation*, a consolidated multi-district proceeding on behalf of women who suffered permanent, disfiguring hair loss following breast cancer chemotherapy treatments. Karen believes in advocating for drug safety and for the victims in the face of profit-driven corporations. She has testified twice before FDA advisory boards as well as the California State Legislature on the safety concerns regarding the SSRI antidepressants and the manufacturers' misconduct.

Karen frequently publishes and presents on issues involving drug safety, mass tort litigation, FDA reform and federal preemption for both legal organizations (plaintiff and defense) and medical groups.

400 Continental Blvd
6th Floor
El Segundo, CA 90245
T 510.350.9700
F 510.350.9701
kbm@classlawgroup.com

Practice Emphasis

Class Actions
Mass Personal Injury

Education

University of California, Davis
King Hall School of Law, J.D.,
1995.

Colorado State University,
B.A., 1989.

Admissions

California

Awards & Honors

AV Preeminent® Peer Review Rated by Martindale-Hubbell
Southern California Super Lawyer (2004-2018)
Lawyer of the Year by *Lawyer's Weekly USA* (2004)
California Lawyer of the Year by *California Lawyer* magazine (2005)
Consumer Attorney of the Year Finalist by CAOC (2006)

Professional Affiliations

American Association for Justice
Co-Chair, Taxotere Litigation Group
Consumer Attorneys of California
Consumer Attorneys of Los Angeles
American Bar Association (appointed member of the Plaintiffs' Task Force)
Women En Mass
The Sedona Conference (WG1, Electronic Document Retention and Production)
The National Trial Lawyers
National Women Trial Lawyers Association
LA County Bar Association
Women Lawyers Association of Los Angeles
Public Justice



Geoffrey Munroe | Partner

Geoffrey Munroe represents plaintiffs in high-profile class action and mass tort cases in both federal and state courts throughout the United States. He was selected as a Rising Star by Northern California Super Lawyers (2010-2014), recognizing him as one of the best young attorneys practicing in Northern California, and as a Northern California Super Lawyer in 2015. He is the co-author of "*Consumer Class Actions in the Wake of Daugherty v. American Honda Motor Company*," CAOC's Forum Magazine, January/February 2009, and a frequent contributor to the Class Action Litigation Group Newsletter of the American Association for Justice.

505 14th Street
Suite 1110
Oakland, CA 94612
T 510.350.9700
F 510.350.9701
gam@classlawgroup.com

Practice Emphasis

Class Actions
Consumer Protection
Mass Personal Injury
Whistleblower

Education

University of California,
Berkeley Boalt Hall School of
Law, J.D., 2003

University of California at
Berkeley, B.A., 2000

Admissions

California

Mr. Munroe is a 2003 graduate of the University of California at Berkeley School of Law (Boalt Hall), where he was the recipient of the American Jurisprudence Award in Torts, Business Law & Policy and Computer Law. He received his undergraduate degree in chemistry from the University of California at Berkeley in 2000. Mr. Munroe is a member of the Public Justice Class Action Preservation Project Committee, the Class Action Litigation Group of the American Association for Justice and the Consumer Attorneys of California. He is a member of the California Bar and is admitted to practice before the United States Court of Appeals for the Ninth Circuit, as well as the United States District Courts for the Northern, Central and Southern Districts of California.

Litigation Highlights

Skold v. Intel Corp. – Key member of the briefing team in this decade-long litigation that achieved a nationwide class action settlement on behalf of approximately 5 million consumers of Intel Pentium 4 processors. The lawsuit changed Intel's benchmarking practices and Intel agreed to a cash settlement for the class, along with \$4 million in charitable donations.

In re Chase Bank U.S.A., N.A. "Check Loan" Contract Litigation – Key member of the litigation team in this multidistrict case alleging that Chase Bank wronged consumers by offering long-term fixed-rate loans, only to later more-than-double the required loan payments. The litigation resulted in a \$100 million settlement with Chase eight weeks prior to trial.

In re Mercedes-Benz Tele Aid Contract Litigation – Key member of the litigation team in this multi-district litigation alleging that Mercedes-Benz failed to disclose to its customers that the "Tele Aid" equipment installed in their vehicles would soon be obsolete and require an expensive replacement to keep working. Resulted in a class settlement providing for cash reimbursements of \$650, or new vehicle credits for up to \$1,300.

Parkinson v. Hyundai Motor America – key member of the briefing team that achieved certification of a nationwide class alleging Hyundai sold vehicles with defective flywheel systems, before ultimately reaching a favorable settlement for the class.

Awards & Honors

Northern California Super Lawyers (2015-2018)
Northern California Super Lawyers, *Rising Star* (2010 - 2014)

Professional Affiliations

Consumer Attorneys of California
American Association for Justice- Class Action Litigation Group
Public Justice- Class Action Preservation Project



Andre M. Mura | Partner

Andre M. Mura represents plaintiffs in class action and complex litigation concerning consumers' and workers' rights, products liability, drug and medical devices, federal jurisdiction, and constitutional law.

Prior to joining Gibbs Law Group LLP, Mr. Mura was senior litigation counsel at the Center for Constitutional Litigation PC, where he represented plaintiffs in high-stakes appeals and complex litigation in state supreme courts and federal appellate courts. Mr. Mura also authored briefs filed in the U.S. Supreme Court, at both the petition and merits stages, and argued dispositive motions in trial courts nationwide. SCOTUSblog, the blog of the Supreme Court of the United States, selected Mr. Mura's petition for certiorari in *Malaterre v. Amerind Risk Management Corp.*, No. 11-441 as "Petition of the Day."

Andre is frequently called upon to discuss emerging issues in class actions, and regularly contributes his insights and commentary to the Consumer Law Watch, a blog analyzing developments in the law of consumer class actions. He is a member of the American Bar Association (ABA) Tort Trial and Insurance Practice Section (TIPS) Plaintiffs Policy Task Force. He serves as chair-elect of the ABA-TIPS Appellate Advocacy Committee. Andre is a member of the Lawyers Committee of the National Center for State Courts and a former chair of its Young Lawyers Committee. He is also a member of the American Association for Justice and the Consumer Attorneys of California.

Andre is of counsel to Girard Gibbs and a partner at Gibbs Law Group.

Litigation Highlights

Reynolds v. Wal-Mart – Andre successfully opposed Wal-Mart's motion to dismiss in this putative class action in federal court concerning deceptive food labeling.

Corber v. Xanodyne Pharmaceuticals - Andre represented plaintiffs injured by propoxyphene, an ingredient found in Darvocet and Darvon pain relief drugs and generic pain relievers, before the U.S. Court of Appeals for the Ninth Circuit, sitting en banc.

Watts v. Lester E. Cox Medical Centers, 376 S.W.3d 633 (Mo. 2012), Andre successfully argued that a state law limiting compensatory damages in medical malpractice cases violated his client's constitutional right to trial by jury. In ruling in favor of Mr. Mura's client, the Missouri high court agreed to overturn a 20-year-old precedent.

Texaco, Inc. & Chevron Corp. v. Simon, Mr. Mura argued before the Mississippi Supreme Court in a case concerning Texaco's and Chevron's liability for pregnant women's exposure to leaded gas. The case settled favorably after oral argument but before decision.

U.S. Supreme Court Advocacy

J. McIntyre Machinery, Ltd. v. Nicastro, 131 S. Ct. 2780 (2011), Andre drafted merits briefing addressing whether personal jurisdiction exists over a foreign manufacturer.

Mutual Pharmaceutical Co., Inc. v. Bartlett, 133 S. Ct. 2466 (2013), Andre was the lead author of an amicus curiae brief for the American Association for Justice and Public Justice in case examining whether federal drug safety law preempts state-law liability for defectively designed generic drugs.

Qwest Services Corp. v. Blood, 132 S. Ct. 1087 (2012), Andre was counsel of record for plaintiffs in opposing Supreme Court review of an \$18 million punitive damages award. SCOTUSblog, the blog of the Supreme Court of the United States, selected Mr. Mura's petition for certiorari in *Malaterre v. Amerind Risk Management Corp.*, No. 11-441 as "Petition of the Day."

505 14th Street

Suite 1110

Oakland, CA 94612

T 510.350.9700

F 510.350.9701

amm@classlawgroup.com

Practice Emphasis

Class Actions

Consumer Protection

Constitutional Law

Employment Law

Mass Personal Injury

Education

The George Washington
University Law School, J.D.,
2004

Williams College, B.A., 2000

Admissions

California

District of Columbia

Awards & Honors

Top Cybersecurity & Privacy Attorneys Under 40, *Law360* Rising Stars (2017)

Northern California Super Lawyers *Rising Star* (2016-2018)

Professional Affiliations

American Association for Justice- Class Action Litigation Group, Legal Affairs Group

American Bar Association- Chair, Appellate Advocacy Committee of Tort Trial and Insurance Practice Section; Plaintiff's Policy Task Force

Consumer Attorneys of California

National Center for State Courts, Lawyers Committee

Pound Civil Justice Institute

Public Justice Foundation- Class Action Preservation Projects Committee

Publications & Presentations

Presenter, "Class Settlements and Certification in the Wake of *In Re Hyundai Fuel Economy Litigation*," Class Action Mastery Conference, HB Litigation, May 2018.

Presenter, "Effective Legal Writing Workshop," American Association for Justice Education Seminar, April 2018.

Presenter, "Strategic Responses to Recent Supreme Court Decisions [*Bristol-Myers/Spokeo*]," Consumer Class Action Symposium, National Consumer Law Center, November 2017.

Co-author, "Supreme Court Applied 'Settled Principles' In BMS Ruling," *Law360* Expert Analysis, September 11, 2017

Presenter, "Latest Developments Including Recent and Most Significant Class Action Lawsuits and Proposed Federal Legislative Changes," Bridgeport 2017 Class Action Litigation Conference, September 8, 2017

Co-author, "In the Breach," *Trial Magazine*, American Association for Justice, September 2017

Co-author, "Supreme Court Puts Personal Jurisdiction On Trial," *Law360* Expert Analysis, May 22, 2017

Co-Author, "Beware Intended Consequences of Class Action Reform, Too," *Law360* Expert Analysis, March 14, 2017.

Presenter, "Developing the Case through Pleadings and Discovery: Addressing Personal Jurisdiction," AAJ Winter Convention, February 2017.

Presenter, "The Supreme Court Argument," California Mass Tort and Class Action Litigation Conference: The Impact of Daimler and BMS-Plavix, HarrisMartin Publishing, October 2016.

Moderator and Presenter, "An Examination of Personal Jurisdiction," American Association for Justice Educational Conference, September 2016.

Presenter, "Personal Jurisdiction In Mass Torts and Class Actions: Exploring the Impact of BMS v. Superior Court," American Association for Justice Rapid Response Webinar, September 2016.

Co-Author, "Recent Developments in Appellate Advocacy," *Tort Trial & Insurance Practice Law Journal*, Fall 2013, Winter 2015, Winter 2016.

Author, *Buckman Stops Here! Limits on Preemption of State Tort Claims Involving Allegations of Fraud on the PTO or the FDA*, 41 Rutgers L.J. 309, 2010.



Michael Schrag | Partner

Michael Schrag has over 20 years of experience representing individual and small business plaintiffs in a broad range of complex class actions against large corporations in the banking, credit card, telecommunications, and real estate sectors. He has also successfully litigated antitrust, securities, product liability, personal injury, medical malpractice, employment, and contingent breach of contract cases. He currently serves on the Plaintiffs Steering Committee in the *In re: Wells Fargo Auto Insurance Marketing and Sales Practices Litigation* and on the Expert Committee in the *In re: Disposable Contact Lens Antitrust Litigation*.

Michael served as Co-Lead counsel in *Beaver v. Tarsadia Hotels*, an unfair competition class action against real estate developers, which recently settled for \$51.15 million. He currently represents over 300 purchasers of fractional interests in luxury condominiums in breach of fiduciary duty and contract cases against Marriott and Starwood.

He also recently settled (for confidential sums) three related actions in California and Florida on behalf of small business owners alleging RICO and fraud claims against American General Insurance Company, a subsidiary of AIG. Michael previously represented a class of small business owners in a breach of contract case against an AT&T subsidiary that resulted in a \$27 million judgment.

Michael is a 1996 graduate of the University of California at Berkeley School of Law (Boalt Hall) and received his undergraduate degree in 1989 from Columbia College at Columbia University. He began his career prosecuting securities class actions and serving as a law clerk to the Honorable Judith N. Keep, U.S. District Judge, Southern District of California. Early in his career, Michael helped initiate and prosecute class actions against Visa, MasterCard, and major U.S. banks for failing to disclose and fixing the price of currency conversion fees. These cases settled for \$336 million.

Litigation Highlights

Beaver v. Tarsadia Hotels- Michael served as co-lead counsel on behalf of consumers in this unfair competition class action against real estate developers selling hotel-condominium units. Lawsuit alleged that sellers concealed certain Congressionally-mandated protections in the sales contracts, including a statutory rescission right. After six years of litigation including a win in the Ninth Circuit that established favorable law for consumers, the lawsuit settled for \$51.15 million. In granting final approval, Judge Curiel concluded that the settlement was "an excellent result," and noted "Class Counsel overcame several hurdles that reflect their skill and experience." *Beaver v. Tarsadia Hotels*, 816 F. 3d1170 (9th Cir. 2016)

Asokan et. al. v. American General Ins. Co.- Member of the trial team in this insurance and investment fraud case against American General Insurance Co, an AIG subsidiary. Michael and his team represented six plaintiffs who were marketed an investment involving a specialized whole life policy that would supposedly provide tax benefits. American General knew but concealed from plaintiffs that the plans no longer complied with the law. Plaintiffs suffered losses as a result of this fraud by concealment. Among other tasks, Michael had primary responsibility for working with plaintiffs' damages expert and conducted the direct and re-direct examination of this expert at trial. The case settled for a confidential sum 8 days into the jury trial.

Smith et. al. v. American General Ins. Co. - Michael was a key member of the litigation team that represented nine high net worth plaintiffs in this RICO action alleging that American General and the other members of the enterprise falsely marketed and sold our clients a whole life policy that would supposedly provide a multitude of tax benefits, but concealed the fact that the IRS had changed its regulations, rendering these plans no longer compliant with the law. Among other tasks, Michael had primary responsibility for working with plaintiffs' damages expert and deposing the defendants' damages expert. The case settled for a confidential sum.

505 14th Street
Suite 1110
Oakland, CA 94612
T 510.350.9700
F 510.350.9701
mjs@classlawgroup.com

Practice Emphasis

- Antitrust
- Class Actions
- Consumer Protection
- Mass Personal Injury
- Securities and Financial Fraud
- Whistleblower

Education

- University of California, Berkeley Boalt Hall School of Law, J.D., 1996
- Columbia College at Columbia University, B.A., 1989

Admissions

- California

Ammari v. Pacific Bell Directory – Represented consumers who overpaid an AT&T subsidiary for advertising in Yellow Pages directories. Plaintiffs prevailed at trial and on two appeals to obtain a \$27 million judgment for class members, a result the *National Law Journal* deemed as one of the top 100 verdicts in 2009.

In re Currency Conversion Fee Antitrust Litigation– After prevailing at trial in a related state court action, plaintiffs negotiated a \$336 million global settlement for the class in this multidistrict antitrust litigation against the country's largest credit card issuers and networks.

In Re Sulzer Hip Prosthesis and Knee Prosthesis Liability Litigation – recovered over \$10 million on behalf of his clients in this multidistrict litigation that awarded a total of \$1 billion to patients who received defective hip implants.



505 14th Street
Suite 1110
Oakland, CA 94612
T 510.350.9700
F 510.350.9701
ds@classlawgroup.com

Practice Emphasis

Class Actions
Consumer Protection
Financial Fraud
Whistleblower

Education

Emory University School
of Law, J.D., 2007

University of California at
Santa Barbara, B.A.,
2003

Admissions

California

David Stein | Partner

David Stein represents plaintiffs in complex consumer protection and financial fraud cases against Fortune 100 companies. He currently serves as co-lead counsel in the *In re Honda CR-V Vibration* multidistrict proceedings and is among the attorneys representing patients, providers, and consumers in a lawsuit against Banner Health arising from a data breach that exposed sensitive information of nearly 4 million people.

David's advocacy in consumer protection and class action litigation has earned him several awards and accolades, including recognition in the 2017 "Top 40 Under 40" list published by the Daily Journal. David was also selected as a 2017 "Top Class Action Attorney Under 40" in Law360's Rising Stars, one of only four attorneys nationwide to be selected for the honor. He has also been named a *Rising Star* by Northern California Super Lawyers for four consecutive years.

He is frequently called upon to discuss emerging issues in class actions, and regularly contributes his insights and commentary to *Consumer Law Watch*, a blog analyzing developments in the law of consumer class actions.

David previously served as judicial law clerk to U.S. District Court Judge Keith Starrett and to U.S. Magistrate Judge Karen L. Hayes.

Litigation Highlights

Paeste v. Government of Guam – helped secure a judgment against the Government of Guam and several of its highest-ranking officials in a suit involving the government's unlawful administration of income tax refunds. Mr. Stein defended the judgment in an oral argument before the U.S. Court of Appeals for the Ninth Circuit, leading to a complete victory for the taxpayers in the published decision, *Paeste v. Government of Guam*, 798 F.3d 1228 (9th Cir. 2015)

Edwards v. Ford Motor Co. – in a class action alleging that Ford sold vehicles despite a known safety defect, Mr. Stein twice argued plaintiff's position before the U.S. Court of Appeals for the Ninth Circuit. In the first appeal, Mr. Stein succeeded in obtaining a reversal of the trial court's denial of class certification. In the second, plaintiff again prevailed, with the Ninth Circuit affirming a ruling that Mr. Stein's and his colleagues' efforts generated free repairs, reimbursements, and extended warranties for the class.

In re: Peregrine PFG Best Customer Accounts Litigation - represented investors in a lawsuit against U.S. Bank and JPMorgan Chase arising from the collapse of Peregrine Financial Group, Inc. The former Peregrine customers were seeking to recover the millions of dollars that was stolen from them out of segregated funds accounts. Plaintiffs' efforts led to settlements with JPMorgan Chase and U.S. Bank worth over \$75 million.

In re: Hyundai Sonata Engine Litigation – Mr. Stein served as court-appointed co-lead counsel in this nationwide suit involving engine seizures at high speeds. The litigation led to a settlement that included nationwide vehicle recalls, extended warranties, and payments that averaged over three thousand dollars per class member.

Browne v. American Honda Motor Co., Inc. – represented consumers who alleged that 750,000 Honda Accord and Acura TSX vehicles were sold with brake pads that wore out prematurely. A settlement ensued worth approximately \$25 million, with hundreds of thousands of class members participating.

Awards & Honors

"2017 Top 40 Under 40," *Daily Journal*

Top Class Action Attorneys Under 40, *Law360* Rising Stars (2017)

Northern California Super Lawyers *Rising Star* (2013-2018)

Professional Affiliations

American Association for Justice
Association of Business Trial Lawyers
Federal Bar Association
Public Justice Foundation

Publications & Presentations

Presenter, "Determining Damages in Class Actions," *Class Action Mastery Conference*, HB Litigation, May 2018.

Presenter, "Mass Torts and Class Actions: The Latest and Greatest, Update on Class Action Standing" *56th Annual Consumer Attorneys of California Convention*, November 2017.

Author, Third Circuit Crystallizes Post-Spokeo Standard, *Impact Fund Practitioner Blog*, July 2017.

Presenter, "Playing Defense: Reading the Long Game," *American Association for Justice*, May 2017.

Presenter, "Motion to Dismiss – What's Trending?" *HB Litigation Conferences, Mass Tort Med School + Class Actions*, March 2017

Presenter, "Class Certification," *HB Litigation Conferences, Mass Tort Med School + Class Actions*, March 2017.

Presenter, "Class Remedies," *HB Litigation Conferences, Mass Tort Med School + Class Actions*, March 2017.

Co-Author, "Beware Intended Consequences of Class Action Reform, Too," *Law360 Expert Analysis*, March 14, 2017.

Co-Author, "California Omissions Claims: Safety Required?" *Law360 Expert Analysis*, February 15, 2017.

Presenter, "Hot Topics and Trends in Prosecuting and Defending Consumer Class Actions," *Bridgeport Continuing Education 2017 Consumer Class Action Litigation Conference*.

Presenter, "Perspectives on Automotive Class Action Litigation," *Stafford Publishers*.

Presenter, "Motion to Dismiss – What's Trending?" *HB Litigation Conferences, Consumer Class Actions*.

Presenter, "Beyond the Mass Tort: Class Action Cases Arising from Big Pharmaceutical Wrongdoing," *Consumer Attorneys of California*,

Presenter, "Rule 23(c)(4) Issue Certification Post-Comcast," *American Association for Justice*.

Author, *Wrong Problem, Wrong Solution: How Congress Failed the American Consumer*, 23 *Emory Bankr. Dev. J.* 619 (2007).



Steven Tindall | Partner

Steven Tindall has specialized in employment and class action litigation for the past eighteen years. He has been plaintiffs' lead or co-lead counsel on several cases that resulted in settlements worth over \$1 million. Prior to joining Gibbs Law Group, Steven was a partner at Rukin Hyland Doria & Tindall, and at Lieff Cabraser Heimann & Bernstein. While at Lieff Cabraser, Steven focused on plaintiffs' class action litigation in the fields of wage and hour law, antitrust, and consumer protection. Steven has also litigated a number of mass tort personal injury and toxic tort cases.

Steven received his B.A. degree in English Literature from Yale University, graduating summa cum laude, Phi Beta Kappa, and with distinction in his major. He earned his J.D. degree from the University of California at Berkeley School of Law (Boalt Hall) in 1996. While at Boalt, Steven co-directed the East Bay Workers' Rights Clinic. After graduating from Boalt, Steven clerked for Hon. Judith N. Keep of the United States District Court for the Southern District of California and for Hon. Claudia Wilken of the U.S. District Court for the Northern District of California.

505 14th Street
Suite 1110
Oakland, CA 94618
T 510.350.9700
F 510.350.9701
smt@classlawgroup.com

Practice Emphasis

Class Actions
Employment Litigation

Education

University of California,
Berkeley Boalt Hall School of
Law, J.D., *magna cum laude*,
1996.

Yale University, B.A., *summa
cum laude*, *Phi Beta Kappa*.

Awards & Honors

Northern California Super Lawyers (2009-2018)

Professional Affiliations

East Bay Community Law Center, Board Member

Publications & Presentations

Contributor, "Can Interest Rates be Unconscionable?" Daily Journal Appellate Report Podcast, July 6, 2018.

Co-Author, "Epic Systems and the Erosion of Federal Class Actions," Law360 Expert Analysis, July 5, 2018.

Co-Author, "Senate Should Reject Choice Act and Its Payday Free Pass," Law360 Expert Analysis, July 12, 2017.

Presenter, "Preparing for and Litigating PAGA Claims 2017," Bridgeport Continuing Education, March 3, 2017.

Contributing Author, California Class Actions Practice and Procedure, Matthew Bender & Co., Inc., 2006

Author, *Do as She Does, Not as She Says: The Shortcomings of Justice O'Connor's Direct Evidence Requirement in Price Waterhouse v. Hopkins*, Berkeley Journal of Employment and Labor Law, 17, No. 2, 1996

Admitted

California



Amy Zeman | Partner

Amy Zeman represents clients in a wide variety of medical mass injury matters, including individuals harmed by transvaginal mesh, the birth-control medications Yaz and Yasmin, the diabetes drug Actos, and the anti-psychotic medication Risperdal, among others. Ms. Zeman also represents consumers in class action litigation, with experience working closely with class representatives and consumer contacts and participating in all stages of litigation. Ms. Zeman has been named a *Rising Star* by Northern California Super Lawyers every year since 2013.

Prior to attending law school, Ms. Zeman pursued a career in the financial sector. Ms. Zeman served the members of the Marin County Federal Credit Union for almost seven years, acting as the Accounting and Compliance Manager. Ms. Zeman was a spring 2010 extern for the Honorable Marilyn Hall Patel of the United States District Court, Northern District of California.

Litigation Highlights

Yaz & Yasmin Birth Control Litigation – represents women throughout the country who suffered serious side effects after taking Yaz, Yasmin and Ocella birth control.

Pelvic System Products Liability Litigation (transvaginal mesh) - represents women across the country who suffered serious complications after receiving transvaginal mesh implants.

Actos (Pioglitazone) Products Liability Litigation –represents individuals who were diagnosed with bladder cancer after taking the oral anti-diabetic drug Actos.

Sanborn, et al. v. Nissan North America, Inc. – appointed as class counsel with Eric Gibbs and others. The litigation team obtained a settlement just ten days before trial was to begin on claims that the dashboards in certain Nissan vehicles were melting into a shiny, sticky surface that produced a dangerous glare. The settlement allowed class members to obtain a \$1500-\$2000 dashboard replacement for just \$250, or to receive equivalent reimbursement for prior replacements.

Chase Bank U.S.A., N.A. “Check Loan” Contract Litigation – key member of the litigation team in this multidistrict case alleging that Chase Bank wronged consumers by offering long-term fixed-rate loans, only to later more-than-double the required loan payments. The litigation resulted in a \$100 million settlement with Chase eight weeks prior to trial.

Sugarman v. Ducati North America, Inc., - represented Ducati motorcycle owners whose fuel tanks on their motorcycles degraded and deformed due to incompatibility with the motorcycles’ fuel. In January 2012, the Court approved a settlement that provided an extended warranty and repairs, writing, “The Court recognizes that class counsel assumed substantial risks and burdens in this litigation. Representation was professional and competent; in the Court’s opinion, counsel obtained an excellent result for the class.”

Awards & Honors

Rising Star, Northern California Super Lawyers (2013-2018)

Professional Affiliations

American Bar Association, Tort Trial and Insurance Practice Section

American Association for Justice

- Secretary, Class Action Litigation Group,
- Co-Chair, Qui Tam Litigation Group
- Member, Women Trial Lawyers Caucus

Consumer Attorneys of California

505 14th Street
Suite 1110
Oakland, CA 94618
T 510.350.9700
F 510.350.9701
amz@classlawgroup.com

Practice Emphasis

Class Actions
Consumer Protection
Mass Personal Injury
Whistleblower/ Qui Tam

Education

University of California,
Hastings College of Law, J.D.,
magna cum laude, 2010.

University of Missouri, B.A.,
summa cum laude, 1998.

Admissions

California
Florida

Publications & Presentations

Presenter, "Claims-processing in Large and Mass-Tort MDLs," Emerging Issues in Mass-Tort MDLs Conference, Duke University, October 2016.

Presenter, "Cross Pollination: Diversifying Your Case Garden," HB Litigation Conferences, Consumer Class Actions, May 2016.

Presenter, "Best Practices in Law Firm Management," American Association for Justice 2016 Winter Convention, Women's Trial Lawyers Caucus Leadership Summit, February 2016.

Presenter, "Effects of MIR 162 on U.S. Corn Farmers," Mass Tort Med School, HB Litigation Conferences, May 2015.

Presenter, "Lumber Liquidators Litigation," American Association for Justice 2015 Annual Convention, July 2015.

Presenter, "Recent Developments in Class Certification in the United States and Canada," American Association for Justice 2015 Annual Convention, July 2015.

Co-author, "Tips on Client Contact and Case Management in Mass Torts Part I: Client Intake and Gathering Relevant Information," American Association for Justice, Women Trial Lawyers Caucus Connections Count Newsletter, 2013.

Co-author, "Tips on Client Contact and Case Management in Mass Torts Part II: Organizing and Working with Client Information," American Association for Justice, Women Trial Lawyers Caucus Connections Count Newsletter, 2013.



505 14th Street
Suite 1110
Oakland, CA 94612
T 510.350.9700
F 510.350.9701
ajd@classlawgroup.com

Practice Emphasis

Class Actions
Consumer Protection
Employment Law
Mass Personal Injury
Securities Law

Education

University of California,
Hastings College of Law,
J.D., 1988

Fairfield University, B.A.,
1982

University of London,
London School of
Economics (General
Course Degree, 1981)

Admissions

California

Awards & Honors

AV Preeminent® Peer
Review Rated by
Martindale-Hubbell

Northern California Super
Lawyer (2013 - 2018)

AAJ Above and Beyond
Award, 2018

AAJ Distinguished Service
Award, 2016

A.J. de Bartolomeo | Of Counsel

A.J. De Bartolomeo has nearly thirty years of experience prosecuting class actions and complex matters in courts throughout the country. She has extensive expertise litigating mass personal injury matters involving defective drugs and medical devices. A.J. currently serves in court-appointed leadership positions in several MDL mass tort actions, including serving on the Plaintiffs' Steering Committees in the *In re: Yaz and Yasmin Birth Control Litigation*, *In re: Actos Products Liability Litigation* and *In re: Pradaxa Products Liability Litigation*. She serves on the Law and Briefing committees and has been involved with *Daubert* briefings in a number of cases. A.J. previously served on the Plaintiff's Steering Committee in the *In re Transvaginal Mesh Litigation*.

Committed to advancing opportunities for women lawyers, Ms. De Bartolomeo is the former Chair of the Women's Trial Lawyer Caucus of the American Association of Justice, where she oversaw the caucus's work in leadership training, student scholarship, membership and political outreach, and other pro-civil justice functions. She is an active member of the American Bar Association Sections on Tort Trial and Insurance Practice, the American Bankruptcy Institute and Consumer Attorneys of California. Ms. De Bartolomeo has been named among the highest class of attorneys for professional ethics and legal skills with an AV-Preeminent rating by *Martindale Hubbell*, and was recognized by her peers as a Northern California *Super Lawyer* every year since 2013.

Ms. De Bartolomeo frequently speaks before industry organizations on developments in consumer class actions, mass tort litigation, *Daubert* challenges, Rule 37 and Inherent Power sanctions, and the settlement approval process.

Litigation Highlights

Consumer Protection, Bankruptcy and Securities Litigation

In re Motors Liquidation Company, et al., f/k/a General Motors Corp., et al. (Bankruptcy Litigation) – A.J. served as Lead Counsel for unsecured creditors in two class action cases in the General Motors bankruptcy proceedings (court-certified classes in *In Re Piston Slap Class Litigation* and *In Re Dex-Cool Class Litigation*). The cases were settled in Bankruptcy Court for nearly \$12 million.

In re American Express Advisors Securities Litigation – Served as second chair and achieved settlement of \$100 million on behalf of individuals who bought financial plans and invested mutual funds from American Express Financial advisors.

CalSTRS v. Qwest Communications, et al. – Served as Co-Lead Counsel in the representation of California State Teachers' Retirement System in opt-out securities fraud action against Qwest Communications, Inc. and certain of its officers and directors, as well as its outside auditor Arthur Andersen. Settled for \$45 million.

Telstar v. MCI, Inc. – Served as lead counsel achieving settlement of more than \$2.8 million in cash on behalf of class of commercial subscribers alleging FCA violations for unfair billing practices.

In re MCI Non-Subscriber Rates Litigation – Served as second chair and achieved \$90 million cash settlement on behalf of MCI subscribers who were charged MCI's non-subscriber or "casual caller" rates and surcharges instead of the lower rates which MCI advertised and subscribers expected to be charged.

Lehman v. Blue Shield – A.J. served as lead counsel and achieved a settlement for more than \$6.5 million in cash on behalf of class of subscribers overpaying insurance premiums.

Mass Personal Injury

In re: Yaz & Yasmin Birth Control Litigation – A.J. serves on the Plaintiffs’ Steering Committee in this coordinated litigation on behalf of women throughout the country who suffered serious side effects after taking Yaz, Yasmin and Ocella birth control. She serves as co-chair of the Law and Briefing committee and substantially contributed to the *Daubert* briefing that defeated all of the defendants’ 16 challenges to plaintiffs’ expert testimony.

In re: Actos Products Liability Litigation – A.J. serves on the Plaintiffs’ Steering Committee in this coordinated litigation on behalf of individuals who were diagnosed with bladder cancer after taking the oral anti-diabetic drug Actos. She serves as a member of the Law and Briefing committee in this litigation.

In re: Pradaxa Products Liability Litigation – A.J. serves on the Plaintiffs’ Steering Committee in this coordinated litigation on behalf of individuals who suffered internal hemorrhaging and other serious complications after taking the anticoagulant drug Pradaxa. She serves on the *Daubert* briefing committee in this case.

Professional Affiliations

American Association for Justice

Member, Board of Governors

Chair, State Trial Lawyers Association (TLA) Outreach Committee

Former Chair, Women’s Trial Lawyer’s Caucus;

Member, Class Action Litigation Group.

Consumer Attorneys of California

American Bar Association- Tort Trial and Insurance Practice Section

American Bankruptcy Institute

Association of Business Trial Lawyers

Publications & Recent Presentations

Presenter, “Communicating with the Class,” Class Action Mastery Conference, HB Litigation, May 2018.

Presenter, “Current Class Action Landscape in Opioids Multidistrict Litigation,” HB Litigation: Opioid Crisis- Claims, Damages & Science, January 2018.

Presenter, “Class Treatment: Can These Claims be Resolved by a Class Action?” American Association for Justice: Opioid Litigation Seminar, September 2017.

Presenter and Moderator, “Are you going to eat that? Issues, hurdles and opportunities in food and supplement litigation,” 26th Annual Spring CLE Meeting for the American Bar Association Tort and Insurance Practice Section (TIPS), Toxic Torts and Environmental Law Committee, April 2017.

Presenter, “Strategies for Dealing with Objectors to Class Action Settlements,” Consumer Attorneys of California Class Action Seminar, February 2017.

Presenter, “Plastic in the Pelvis: Essure and Mesh Litigation,” Harris Martin Women’s Health Litigation Conference, June 2016.

Presenter, “Combatting the Latest Defense Tactics in Mass Torts/ Plaintiff Practice,” Consumer Attorneys of California Sonoma Travel Seminar, April 2016.

Presenter, “Mass Tort Claims, Product Testing and Causation Issues,” 25th Annual Spring CLE Meeting for the American Bar Association Tort Trial and Insurance Practice Section (TIPS) Toxic Torts and Environmental Law Committee, April 2016.



John Kehoe | Of Counsel

John Kehoe prosecutes securities and financial fraud cases in federal and state courts on behalf of institutional and individual clients. He has served as lead counsel in a number of precedent-setting cases including *In re Bank of America Corporation Securities Litigation* (\$2.4 billion settlement); *In re Wachovia Preferred Securities and Bond/Notes Litigation* (\$627 million settlement); *In re Initial Public Offering Securities Litigation* (\$586 million settlement resolving 309 consolidated actions); *In re Lehman Brothers Securities and ERISA Litigation* (\$516 million settlement); and *In re Marvell Technology Group Ltd. Securities Litigation* (\$72 million settlement). He also had a significant prosecutorial role in *In re Brocade Securities Litigation* (\$160 million settlement).

John has represented clients before the Second and Eleventh Circuit Courts of Appeals, and he is active in merger and acquisition litigation before The Delaware Court of Chancery, including serving on the Executive Committee in *In re Safeway Stockholders Litigation*, through which value of the transaction to stockholders was increased by more than \$80 million.

Prior to attending law school, John worked as a law enforcement officer in the State of Vermont (1986-94), serving as a member of the tactical Special Reaction Team and the Major Accident Investigation Team. He is a program faculty member with the National Institute of Trial Advocacy, and served as an adjunct faculty member with the Trial Advocacy Training Program at the Louisiana State University School of Law.

John is a frequent speaker at conferences focused on shareholder rights and corporate governance issues. He received his Juris Doctorate, magna cum laude, from Syracuse University College of Law. He also received a Masters of Public Administration from the University of Vermont, and Bachelor of Arts from DePaul University, where he was starting goalkeeper on the Division I soccer team, and an exchange student to the University of Economics in Budapest, Hungary.

John is Of Counsel to Gibbs Law Group and a shareholder at Kehoe Law Firm.

T 510.350.9700

jak@classlawgroup.com

Practice Emphasis

Class Actions

Securities Litigation

Education

Syracuse University College of Law, J.D., *magna cum laude*

University of Vermont, M.P.A.

DePaul University, B.A.

Admissions

New York

Pennsylvania



Robert Mosier | Of Counsel

Mr. Mosier's practice is almost exclusively focused on representing plaintiffs harmed by large pharmaceutical and medical device companies. He represents clients injured by Granuflor, Tylenol, Risperdal, Medtronic Infuse, Reglan, Crestor, Pain Pumps, Transvaginal Mesh, DePuy ASR and Pinnacle Hips, Januvia, Byetta and Yaz. Mr. Mosier serves as court-appointed co-lead counsel and liaison counsel and on leadership committees in consolidated litigation throughout the United States.

Mr. Mosier currently serves as Plaintiffs' Co-Lead Counsel in the Risperdal and Invega Product Liability Cases JCCP 4775 litigation, and as Plaintiff's Liaison Counsel in the In re Infusion Pain Pump JCCP 4615 litigation. Mr. Mosier is appointed to the Plaintiff's Steering Committee in the In Re Incretin Mimetics Product Liability Litigation MDL 2452, and the In Re Zolofit Birth Defect Cases JCCP4771. Mr. Mosier is appointed to the Science Committee in the In re Fresenius Granuflor/Naturalyte Dialysate Products MDL 2428.

Prior to joining Sanders Viener Grossman as trial counsel and managing attorney, Mr. Mosier was a partner at McGregor & Mosier, where he obtained numerous multi-million dollar settlements for injured plaintiffs in medical malpractice, brain injury, birth injury, and other significant injury matters through trial. Mr. Mosier also represented victims involved in unique injury and death cases, including hot air balloon crashes, trucking deaths and molestation cases.

Before working to represent the rights of injured plaintiffs, Mr. Mosier represented hospitals, physicians, and medical providers accused of malpractice at one of California's preeminent medical malpractice defense firms. During his tenure as a defense attorney, Mr. Mosier gained invaluable insight and education into the practice of medicine, health care and medical insurance issues.

Mr. Mosier has held an AV Preeminent Attorney rating from Martindale Hubble since 2002, is a National Trial Lawyers – Top 100 Attorney, and an Arizona Top Rated Attorney – Top Trial Lawyers in America.

Mr. Mosier frequently speaks at national legal conventions on various issues involving mass tort litigation. He has prosecuted diverse appellate court issues, obtaining published opinions in the areas of constitutional law, separation of court jurisdiction and dischargeability of intentional tort claims. While working as a medical malpractice defense attorney, Mr. Mosier served as liaison counsel for the Orange County Medical Association/ Orange County Bar Association committee and was frequently invited to speak to hospitals and their staffs on medical/legal issues affecting doctor-patient care.

Robert A. Mosier is of counsel to Gibbs Law Group LLP and managing attorney of Sanders Viener Grossman LLP's Los Angeles office.

T 510.350.9700

rmosier@thesandersfirm.com

Practice Emphasis

Class Actions

Mass Personal Injury

Education

J.D., B.S.L., Thomas Jefferson School of Law, 1992.

Admissions

New York

California

Arizona

T 510.350.9700
mky@classlawgroup.com

Practice Emphasis

Class Actions
Securities Litigation

Education

Delaware Law School, J.D.
George Washington University,
B.A

Admissions

Delaware
New Jersey
Pennsylvania

Michael Yarnoff | Of Counsel

Michael Yarnoff has more than 25 years of experience, including 15 years prosecuting complex securities fraud class actions in federal courts involving claims under both the Securities Act of 1933 and the Exchange Act of 1934. Throughout his career, Michael has represented large institutional clients and individual shareholders and has acted as lead or co-lead counsel in a number of high-profile securities cases, which, collectively, have settled for billions of dollars.

Michael was previously an attorney at a large plaintiff's class-action law firm, where he served as a senior-level partner in the securities department for over nine years. During that time, he also litigated a number of cases against large mortgage lenders for violations of the Real Estate Settlement Procedures Act of 1974, patent infringement matters, and appellate matters before multiple Circuit Courts of Appeal.

Michael received his Juris doctorate from Delaware Law School in 1991 and his undergraduate degree from George Washington University in 1988. While at George Washington University, he served as a political intern for the late Senator John Heinz (Pennsylvania).

Michael Yarnoff is Of Counsel to Gibbs Law Group and a shareholder at Kehoe Law Firm.

Litigation Highlights

Tyco International Ltd. – A landmark \$3.2 billion settlement including the then largest securities class-action recovery from a single corporate defendant (\$2.975 billion) and the second largest auditor settlement (\$225 million).

Delphi Corporation – A \$300 million class-action settlement against auto-parts manufacturer Delphi Corporation (reduced as a result of bankruptcy), including an additional \$38 million recovery against Delphi's outside auditor.

CVS Corporation – A \$110 million recovery on behalf of a group of injured shareholders, representing one of the largest settlements in a securities class-action in First Circuit history.

MDL Mutual Fund Litigation – A six-year litigation that resulted in more than \$80 million in recoveries against a number of mutual fund companies, including Alliance, Alger, and Excelsior.

Associates

Joshua Bloomfield prosecutes complex class action lawsuits with particular experience in data breach/ privacy cases and antitrust disputes. He has focused his legal career in civil and administrative litigation and real estate law for more than 15 years. Mr. Bloomfield is a 2000 graduate of UCLA School of Law. He received his undergraduate degree in a three-year accelerated course of study from University of Pennsylvania in 1996.

Aaron Blumenthal represents consumers and whistleblowers in class action lawsuits involving allegations of corporate misconduct. He has prosecuted a variety of consumer protection cases ranging from false advertising to defective products. He is also involved in the investigation and development of new cases.

Aaron was honored as a 2018 “Rising Star” by Northern California Super Lawyers. He attended the University of California, Berkeley School of Law (Boalt Hall), where he graduated *Order of the Coif* (a distinction awarded only to the top 10 percent of the graduating class). In law school, Aaron worked on consumer issues— writing and publishing a law review article on the practical strategies for combatting class action waivers in a post-*Concepcion* world.

Caroline Corbitt is a 2015 graduate of the University of Southern California Gould School of Law, where she served as Executive Editor of the Southern California Interdisciplinary Law Journal. Ms. Corbitt was a summer 2013 extern for the Honorable Laurel Beeler, Magistrate Judge of the United States District Court, Northern District of California. Ms. Corbitt has also externed at the Federal Trade Commission and the California Department of Justice, Antitrust Division.

Ms. Corbitt was honored as a “Rising Star” by Northern California Super Lawyers in 2017 and 2018. Before law school, she worked in book publishing in San Francisco, California. She received her undergraduate degree in history and literature from Harvard University in 2009.

Amanda Karl represents consumers, employees and others who have been harmed by corporations. She is a 2014 graduate (Order of the Coif) of the University of California at Berkeley School of Law (Boalt Hall), where she served as the Managing Editor of the California Law Review, Director of the Workers’ Rights Disability Law Clinic and Research Assistant to Professor Robert Berring, Jr. She also worked throughout law school as a Clinical Law Student at the East Bay Community Law Center, assisting with litigation targeting criminal record reporting violations, and as a law clerk at Equal Rights Advocates, where she worked on women’s employment issues involving wage and hour law, pregnancy discrimination, ADA and Title VII. Ms. Karl received her undergraduate degree, magna cum laude, in Sociology and Human Rights from Columbia University in 2009.

Amanda was honored as a 2018 “Rising Star” by Northern California Super Lawyers. Following graduation from law school, she served as a law clerk to the Honorable Richard A. Paez, United States Court of Appeals for the Ninth Circuit (2014-2015), and as a law clerk to the Honorable Claudia Wilken, Northern District of California (2015-2016).

Linda Lam focuses her practice on representing consumers, small businesses, and employees in complex contingency litigation. Before joining the firm, Ms. Lam was an associate attorney at a national employee benefits and employment law firm, where she represented workers and retirees.

Ms. Lam was honored as a “Rising Star” by Northern California Super Lawyers in 2017 and 2018. She graduated *magna cum laude* from the University of California, Hastings College of the Law in 2014, where she was inducted into the Order of the Coif. In law school, Ms. Lam served as the Production Editor for the Hastings Race and Poverty Law Journal. She worked as a research assistant to Professor Reuel Schiller. Additionally, Ms. Lam worked on a team in the Refugee and Human Rights Clinic to win asylum status for a domestic violence victim from Mexico. In 2012, she externed for the Honorable Joseph Spero in the Northern District of California.

Steve Lopez is a 2014 graduate of the University of California, Berkeley School of Law (Boalt Hall), where he was a Publishing Editor for the California Law Review and an Editor for the Berkeley Journal of Employment and Labor Law. Mr. Lopez was also a member of the La Raza Law Students Association and the Legal Aid Society–Employment Law Center’s Berkeley Workers’ Rights Clinic, where he successfully argued a client’s unemployment insurance appeal in an administrative hearing. He was the recipient of the American Jurisprudence Award in Insurance Law, and the Prosser Prize in Remedies and Employee Benefits Law.

Mr. Lopez was selected as a “Rising Star” by Northern California Super Lawyers in 2017 and 2018. Before law school, he performed research for a consulting firm specializing in improving justice programs. Mr. Lopez received his undergraduate degree in economics and international relations from the University of Virginia in 2008.

SIGNIFICANT RECOVERIES

Some examples of the cases in which our lawyers played a leadership role are described below:

Securities and Financial Fraud

In re Tyco International Ltd. Securities Litigation, MDL No. 02-1335-PB (D.N.H). Landmark \$3.2 billion settlement including the then largest securities class action recovery from a single corporate defendant (\$2.975 billion), and the second largest auditor settlement (\$225 million).

In re Bank of America Corporation Securities Litigation, 09-MDL-2058 (S.D.N.Y.). Securities class action on behalf of certain shareholders of Bank of America Corporation (“BoA”) arising from materially misleading statements and omissions regarding BoA’s acquisition of Merrill Lynch & Co., Inc. The parties reached an agreement to settle the action for a total of \$2.425 billion in cash and certain corporate governance improvements to be implemented or continued by BoA.

In re Lehman Brothers Equity/Debt Securities Litigation, 08-cv-5523 (S.D.N.Y.). Securities class action on behalf of certain shareholders and bondholders of Lehman Brothers Holdings Inc.’s (“Lehman”) in connection with untrue statements and omitted material facts regarding, among other things, Lehman’s use of undisclosed repurchase and resale transactions, failures to adhere to risk limits, and misstatements concerning Lehman’s concentration of mortgage and real estate-related assets, preventing investors from meaningfully assessing Lehman’s exposure to these risky assets. The Court subsequently approved settlements totaling \$615,218,000 in connection with the litigation, to resolve claims against the individual officer and director defendants, underwriters of certain Lehman offerings, and against Ernst & Young LLP, Lehman’s former auditor.

In re Wachovia Corp. Preferred Securities and Bond/Notes Litigation, 09-cv-6351 (S.D.N.Y.). Securities class action on behalf of certain Wachovia debt holders alleged that Wachovia sold more than \$35 billion of bonds to investors in a series of public offerings while misrepresenting the true nature and quality of Wachovia's "Pick-A-Pay" Option ARM mortgage loan portfolio, and Wachovia's exposure to billions of dollars of losses in mortgage-related assets. On March 31, 2011, the court issued an Opinion and Order substantially denying Defendants' motions to dismiss. On August 5, 2011, Plaintiffs announced that they reached a settlement with all the defendants for a total recovery of \$627 million.

In re American Express Financial Advisors Securities Litigation, No. 04-cv-01773 (S.D.N.Y.). Ms. De Bartolomeo was among the attorneys serving as co-lead counsel in this class action, brought on behalf of individuals who bought financial plans and invested in mutual funds from American Express Financial Advisors. The case alleged that American Express steered its clients into underperforming "shelf space funds" to reap kickbacks and other financial benefits. The Court granted final approval to a cash settlement of \$100 million in addition to other relief.

Roth v. Aon Corp., No. 04-cv-06835 (N.D. Ill.). This securities fraud class action alleged that Aon Corporation and its key executives made misstatements and failed to disclose important information to investors about Aon's role in and reliance on contingent commission kickbacks and steering arrangements with insurers. Mr. Schrag helped prosecute this securities fraud class action against Aon Corporation which resulted in a \$30 million settlement for the plaintiff class.

In re Peregrine Financial Group Customer Litigation, No. 12-cv-5546 (N.D. Ill.). Mr. Stein was among the attorneys serving as co-lead counsel for futures and commodities investors who lost millions of dollars in the collapse of Peregrine Financial Group, Inc. Through several years of litigation, counsel helped deliver settlements worth more than \$75 million from U.S. Bank, N.A., and JPMorgan Chase Bank, N.A.

In re Chase Bank USA, N.A. "Check Loan" Contract Litigation, No. 09-2032 (N.D. Cal.). Gibbs Law Group attorneys and counsel from several firms led this nationwide class action lawsuit alleging deceptive marketing and loan practices by Chase Bank USA, N.A. After a nationwide class was certified, U.S. District Court Judge Maxine M. Chesney granted final approval of a \$100 million settlement on behalf of Chase cardholders.

In re Winstar Communications Securities Litigation, No. 01-cv-11522 (S.D.N.Y.). Gibbs Law Group attorneys represented Allianz of America, Inc., Fireman's Fund and other private institutional investors against Grant Thornton and other defendants arising out of plaintiffs' investments in Winstar Communications, Inc. The firm achieved a settlement on the eve of trial that provided a recovery rate more than 30 times higher than what class members received in a related class action. The recovery (after attorney fees) returned a remarkable 78.5% of the losses plaintiffs may have recovered at trial.

CalSTRS v. Qwest Communications, et al., No. 415546 (Cal. Super. Ct. S.F. Cty.). Ms. De Bartolomeo served as co-lead counsel representing the California State Teachers Retirement System in this opt-out securities fraud case against Qwest Communications, Inc. and certain of its officers and directors, as well as its outside auditor Arthur Andersen. The case resulted in a precedent-setting \$45 million settlement for California school teachers.

Mitchell v. American Fair Credit Association, No. 785811-2 (Cal. Super. Ct. Alameda Cty); *Mitchell v. Bankfirst, N.A.*, No. 97-cv-01421 (N.D. Cal.). This class action lawsuit was brought on behalf of California members of the American Fair Credit Association (AFCA). Plaintiffs alleged that AFCA operated an illegal credit repair scheme. The Honorable James Richman certified the class and appointed the firm as class counsel. In February 2003, Judge Ronald Sabraw of the Alameda County Superior Court and Judge Maxine Chesney of the U.S. District Court for the Northern District of California granted final approval of settlements valued at over \$40 million.

Antitrust and Unfair Business Practices

In re Currency Conversion Fee Antitrust Litigation, MDL No. 1409 (S.D.N.Y.); *Schwartz v. Visa, et. al.*, No. 822404-4 (Cal. Super. Ct., Alameda Cty). Mr. Schrag helped initiate and prosecute several class actions against Visa, MasterCard, and other major U.S. banks, such as Chase and Bank of America, for failing to disclose their price fixing of currency conversion fees charged to cardholders. After prevailing at trial in *Schwartz v. Visa, et. al.*, plaintiffs were successful in obtaining a \$336 million global settlement for the class.

In re TFT-LCD (Flat Panel) Antitrust Litigation, MDL 1827 (N.D. Cal.). Gibbs Law Group attorneys were among the team serving as liaison counsel in this multi-district antitrust litigation against numerous TFT-LCD (Flat Panel) manufacturers alleging a conspiracy to fix prices, which has achieved settlements of more than \$400 million to date.

In re Natural Gas Antitrust Cases I, II, III and IV, JCCP No. 4221 (Cal. Super. Ct. San Diego Cty). Gibbs Law Group attorneys served in a leadership capacity in this coordinated antitrust litigation against numerous natural gas companies for manipulating the California natural gas market, which has achieved settlements of nearly \$160 million.

Beaver v. Tarsadia Hotels, No. 11-cv-1842 (S.D. Cal.); Gibbs Law Group attorneys served as co-lead counsel representing buyers of San Diego Hard Rock Hotel condominium units in this class action lawsuit against real estate developers concerning unfair competition claims. The lawsuit recently settled for \$51.15 million.

Ammari Electronics, et al. v. Pacific Bell Directory, No. RG05198014 (Cal. Super. Ct. Alameda Cty.). Mr. Schrag obtained a \$27 million judgment against an AT&T subsidiary after a jury trial and two successful appeals in this breach of contract class action on behalf of thousands of California businesses that advertised in Pacific Bell yellow pages directories. The National Law Journal featured this win in its "Top 100 Verdicts of 2009."

In re LookSmart Litigation, No. 02-407778 (Cal. Super. Ct. San Francisco Cty). This nationwide class action suit was brought against LookSmart, Ltd. on behalf of LookSmart's customers who paid an advertised "one time payment" to have their web sites listed in LookSmart's directory, only to be later charged additional payments to continue service. Plaintiffs' claims included breach of contract and violation of California's consumer protection laws. On October 31, 2003, the Honorable Ronald M. Quidachay granted final approval of a nationwide class action settlement providing cash and benefits valued at approximately \$20 million.

Lehman v. Blue Shield of California, No. CGC-03-419349 (Cal. Super. Ct. S.F. Cty.). In this class action lawsuit alleging that Blue Shield engaged in unlawful, unfair and fraudulent business practices when it modified the risk tier structure of its individual and family health care plans, Gibbs Law Group attorneys helped negotiate a \$6.5 million settlement on behalf of former and current Blue Shield subscribers residing in California. The Honorable James L. Warren granted final approval of the settlement in March 2006.

Wixon v. Wyndham Resort Development Corp., No. 07-cv-02361 (N.D. Cal.). Gibbs Law Group attorneys served as class and derivative counsel in this litigation brought against a timeshare developer and the directors of a timeshare corporation for violations of California state law. Plaintiffs alleged that the defendants violated their fiduciary duties as directors by taking actions for the financial benefit of the timeshare developer to the detriment of the owners of timeshare interests. On September 14, 2010, Judge White granted approval of a settlement of the plaintiffs' derivative claims.

Berrien, et al. v. New Raintree Resorts, LLC, et al., No. 10-cv-03125 (N.D. Cal.). Gibbs Law Group attorneys filed this class action on behalf of timeshare owners, challenging the imposition of unauthorized special assessment fees. On November 15, 2011, the parties reached a proposed settlement of the claims asserted by the plaintiffs on behalf of all class members who were charged the special assessment. On March 13, 2012, the Court issued its Final Class Action Settlement Approval Order and Judgment, approving the proposed settlement.

Benedict, et al. v. Diamond Resorts Corporation, et al., No. 12-cv-00183 (D. Hawaii). In this class action on behalf of timeshare owners, Gibbs Law Group attorneys represented plaintiffs challenging the imposition of an unauthorized special assessment fee. On November 6, 2012, the parties reached a proposed settlement of the claims asserted by the plaintiffs on behalf of all class members who were charged the special assessment. On June 6, 2013, the Court approved the settlement.

Allen Lund Co., Inc. v. AT&T Corp., No. 98-cv-1500 (C.D. Cal.). This class action lawsuit was brought on behalf of small businesses whose long-distance service was switched to Business Discount Plan, Inc. Gibbs Law Group attorneys served as class counsel and helped negotiate a settlement that provided full cash refunds and free long-distance telephone service.

Mackouse v. The Good Guys - California, Inc., No. 2002-049656 (Cal. Super Ct. Alameda Cty). This nationwide class action lawsuit was brought against The Good Guys and its affiliates alleging violations of the Song-Beverly Warranty Act and other California consumer statutes. The Plaintiff alleged that The Good Guys failed to honor its service contracts, which were offered for sale to customers and designed to protect a customer's purchase after the manufacturer's warranty expired. In May 9, 2003, the Honorable Ronald M. Sabraw granted final approval of a settlement that provides cash refunds or services at the customer's election.

Mitchell v. Acosta Sales, LLC, No. 11-cv-01796 (C.D. Cal. 2011). Gibbs Law Group attorneys and co-counsel served as class counsel representing Acosta employees who alleged that they were required to work off-the-clock and were not reimbursed for required employment expenses. We helped negotiate a \$9.9 million settlement for merchandiser employees who were not paid for all the hours they worked. The Court granted final approval of the settlement in September 2013.

Rubaker v. Spansion, LLC, No. 09-cv-00842 (N.D. Cal. 2009). Gibbs Law Group attorneys and co-counsel filed a class action lawsuit on behalf of former Spansion employees that alleged that the company had failed to provide terminated employees from California and Texas with advance notice of the layoff, as required by the Workers Adjustment and Retraining Notification Act (WARN Act). The bankruptcy court approved the class action settlement we and co-counsel negotiated in 2010. The settlement was valued at \$8.6 million and resulted in cash payments to the former employees.

Mass Tort

In re Actos Pioglitazone-Products Liability Litigation, No. 6:11-md-2299 (W.D. La.). Ms. De Bartolomeo was among those court-appointed to the Plaintiffs Steering Committee and also served on the Daubert and Legal Briefing Committees, in litigation that resulted in a \$2.37 billion settlement.

In re Yasmin and Yaz (Drospirenone) Marketing, Sales, Practices and Products Liability Litigation, MDL No. 2385, No. 3:09-md-02100 (S.D. Ill.). In litigation that ultimately resulted in settlements worth approximately \$1.6 billion, Ms. De Bartolomeo was appointed to the Plaintiffs Steering Committee and served as Co-Chair of the Plaintiffs' Law and Briefing Committee.

In re Pradaxa (Dabigatran Etexilate) Products Liability Litigation, MDL No. 2385, No. 3:12-md-02385 (S.D. Ill.), Ms. De Bartolomeo was appointed by the court to the Plaintiffs Steering Committee in mass tort litigation that resulted in settlements worth approximately \$650 million.

In re: Sulzer Hip Prosthesis And Knew Prosthesis Liability Litigation, MDL No. 1401 (N.D. Ohio); Cal. JCCP No. 4165 (Cal. Super. Court, Alameda Cty). Mr. Schrag helped recover over \$10 million on behalf of his clients in this multidistrict litigation.

In Re Medtronic, Inc. Implantable Defibrillators Product Liability Litigation, No. 05-md-1726 (D.Minn.). Ms. De Bartolomeo served on the discovery and law committees and provided legal, discovery, and investigative support in this lawsuit, following a February 2005 recall of certain models of Medtronic implantable cardioverter defibrillator devices. Approximately 2,000 individual cases were filed around the country and consolidated in an MDL proceeding in District Court in Minnesota. The cases were settled in 2007 for \$75 million.

Deceptive Marketing

Hyundai and Kia Fuel Economy Litigation, No. 2:13-md-2424 (C.D. Cal.). In a lawsuit alleging false advertising of vehicle fuel efficiency, the court appointed Eric Gibbs as liaison counsel. Mr. Gibbs regularly reported to the Court, coordinated a wide-ranging discovery process, and advanced the view of plaintiffs seeking relief under the laws of over twenty states. Ultimately Mr. Gibbs helped negotiate a revised nationwide class action settlement with an estimated value of up to \$360 million. The Honorable George H. Wu wrote that Mr. Gibbs had "efficiently managed the requests from well over 20 different law firms and effectively represented the interests of Non-Settling Plaintiffs throughout this litigation. This included actively participating in revisions to the proposed settlement in a manner that addressed many weaknesses in the original proposed settlement."

In Re Mercedes-Benz Tele Aid Contract Litigation, MDL No. 1914, No. 07-cv-02720 (D.N.J.). Gibbs Law Group attorneys and co-counsel served as co-lead class counsel on behalf of consumers who were not told their vehicles' navigation systems were on the verge of becoming obsolete. Counsel successfully certified a nationwide litigation class, before negotiating a settlement valued between approximately \$25 million and \$50 million. In approving the settlement, the court acknowledged that the case “involved years of difficult and hard-fought litigation by able counsel on both sides” and that “the attorneys who handled the case were particularly skilled by virtue of their ability and experience.”

In re Providian Credit Card Cases, JCCP No. 4085 (Cal. Super. Ct. San Francisco Cty). Mr. Gibbs played a prominent role in this nationwide class action suit brought on behalf of Providian credit card holders. The lawsuit alleged that Providian engaged in unlawful, unfair and fraudulent business practices in connection with the marketing and fee assessments for its credit cards. The Honorable Stuart Pollack approved a \$105 million settlement, plus injunctive relief—one of the largest class action recoveries in the United States arising out of consumer credit card litigation.

In re Hyundai and Kia Horsepower Litigation, No. 02CC00287 (Cal. Super. Ct. Orange Cty). In a class action on behalf of U.S. Hyundai and Kia owners and lessees, contending that Hyundai advertised false horsepower ratings in the United States, attorneys from Gibbs Law Group negotiated a class action settlement valued at between \$75 million and \$125 million which provided owners nationwide with cash payments and dealer credits.

In re MCI Non-Subscriber Telephone Rates Litigation, MDL No. 1275 (S.D. Ill.). This class action lawsuit was brought on behalf of MCI subscribers charged various rates and surcharges instead of the lower rates MCI had advertised. Ten cases were consolidated for pretrial proceedings before the Honorable David R. Herndon. Judge Herndon appointed co-lead counsel for the consolidated actions and Ms. De Bartolomeo played a significant role in the litigation. On March 29, 2001, Judge Herndon granted final approval of a settlement for over \$90 million in cash.

Skold v. Intel Corp., No. 1-05-cv-039231 (Cal. Super. Ct. Santa Clara Cty.). Gibbs Law Group attorneys represented Intel consumers through a decade of hard-fought litigation, ultimately certifying a nationwide class under an innovative “price inflation” theory and negotiating a settlement that provided refunds and \$4 million in cy pres donations. In approving the settlement, Judge Peter Kirwan wrote: “It is abundantly clear that Class Counsel invested an incredible amount of time and costs in a case which lasted approximately 10 years with no guarantee that they would prevail.... Simply put, Class Counsel earned their fees in this case.”

Steff v. United Online, Inc., No. BC265953 (Cal. Super. Ct. Los Angeles Cty.). Mr. Gibbs served as lead counsel in this nationwide class action suit brought against NetZero, Inc. and its parent, United Online, Inc., by former NetZero customers. Plaintiffs alleged that defendants falsely advertised their internet service as unlimited and guaranteed for a specific period of time. The Honorable Victoria G. Chaney of the Los Angeles Superior Court granted final approval of a settlement that provided full refunds to customers whose services were cancelled and which placed restrictions on Defendants' advertising.

Khaliki v. Helzberg's Diamond Shops, Inc., No. 11-cv-00010 (W.D. Mo.). Gibbs Law Group attorneys and co-counsel represented consumers who alleged deceptive marketing in connection with the sale of princess-cut diamonds. The firms achieved a positive settlement, which the court approved, recognizing “that Class Counsel provided excellent representation” and achieved “a favorable result relatively early in the case, which benefits the Class while preserving judicial resources.” The court went on to recognize that “Class Counsel faced considerable risk in pursuing this litigation on a contingent basis, and obtained a favorable result for the class given the legal and factual complexities and challenges presented.”

Data Breach and Privacy

In re Anthem, Inc. Data Breach Litig., MDL No. 2617, No. 15-md-02617 (N.D. Cal.). Gibbs Law Group attorneys serve as part of the four-firm leadership team in this nationwide class action stemming from the largest healthcare data breach in history affecting approximately 80 million people. The parties have announced a proposed \$115 million cash settlement (settlement pending Court approval).

In re Adobe Systems Inc. Privacy Litig., No. 13-cv-05226 (N.D. Cal.). In this nationwide class action stemming from a 2013 data breach, attorneys from Gibbs Law Group served as lead counsel on behalf of the millions of potentially affected consumers. Counsel achieved a landmark ruling on Article III standing (which has since been relied upon by the Seventh Circuit Court of Appeals and other courts) and then went on to negotiate a settlement requiring Adobe to provide enhanced security relief—including the implementation and maintenance of enhanced intrusion detection, network segmentation, and encryption.

Whitaker v. Health Net of Cal., Inc., et al., No. 11-cv-00910 (E.D. Cal.); *Shurtleff v. Health Net of Cal., Inc.*, No. 34-2012-00121600 (Cal. Super Ct. Sacramento Cty). Gibbs Law Group attorneys served as co-lead counsel in this patient privacy case. On June 24, 2014, the court granted final approval of a settlement that provided class members with credit monitoring, established a \$2 million fund to reimburse consumers for related identity theft incidents, and instituted material upgrades to and monitoring of Health Net’s information security protocols.

Smith v. Regents of the University of California, San Francisco, No. RG-08-410004 (Cal. Super Ct. Alameda Cty). Gibbs Law Group attorneys represented a patient who alleged that UCSF’s disclosure of its patients’ medical data to outside vendors violated California medical privacy law. The firm succeeded in negotiating improvements to UCSF’s privacy procedures on behalf of a certified class of patients of the UCSF medical center. In approving the stipulated permanent injunction, Judge Stephen Brick found that “plaintiff Smith has achieved a substantial benefit to the entire class and the public at large.”

Defective Products

In re Hyundai Sonata Engine Litigation, Case No. 5:15-cv-01685 (N.D. Cal.). Gibbs Law Group attorneys served as court-appointed co-lead class counsel on behalf of plaintiffs who alleged their 2011-2014 Hyundai Sonatas suffered premature and catastrophic engine failures due to defective rotating assemblies. We negotiated a comprehensive settlement providing for nationwide recalls, warranty extensions, repair reimbursements, and compensation for class members who had already traded-in or sold their vehicles at a loss. The average payment to class members exceeded \$3,000.

Sugarman v. Ducati North America, Inc., No. 10-cv-05246 (N.D. Cal.). Gibbs Law Group attorneys served as class counsel on behalf of Ducati motorcycle owners whose fuel tanks on their motorcycles degraded and deformed due to incompatibility with the motorcycles' fuel. In January 2012, the Court approved a settlement that provided an extended warranty and repairs, writing, "The Court recognizes that class counsel assumed substantial risks and burdens in this litigation. Representation was professional and competent; in the Court's opinion, counsel obtained an excellent result for the class."

Parkinson v. Hyundai Motor America, No. 06-cv-00345 (C.D. Cal.). Gibbs Law Group attorneys served as class counsel in this class action featuring allegations that the flywheel and clutch system in certain Hyundai vehicles was defective. After achieving nationwide class certification, our lawyers negotiated a settlement that provided for reimbursements to class members for their repairs, depending on their vehicle's mileage at time of repair, from 50% to 100% reimbursement. The settlement also provided full reimbursement for rental vehicle expenses for class members who rented a vehicle while flywheel or clutch repairs were being performed. After the settlement was approved, the court wrote, "Perhaps the best barometer of ... the benefit obtained for the class ... is the perception of class members themselves. Counsel submitted dozens of letters from class members sharing their joy, appreciation, and relief that someone finally did something to help them."

Browne v. Am. Honda Motor Co., Inc., No. 09-cv-06750 (C.D. Cal.). Gibbs Law Group attorneys and co-counsel represented plaintiffs who alleged that about 750,000 Honda Accord and Acura TSX vehicles were sold with brake pads that wore out prematurely. We negotiated a settlement in which improved brake pads were made available and class members who had them installed could be reimbursed. The settlement received final court approval in July 2010 and provided an estimated value of \$25 million.

In Re General Motors Dex-Cool Cases., No. HG03093843 (Cal. Super Ct. Alameda Cty). Gibbs Law Group attorneys served as co-lead counsel in these class action lawsuits filed throughout the country, where plaintiffs alleged that General Motors' Dex-Cool engine coolant damaged certain vehicles' engines, and that in other vehicles, Dex-Cool formed a rusty sludge that caused vehicles to overheat. After consumer classes were certified in both Missouri and California, General Motors agreed to cash payments to class members nationwide. On October 27, 2008, the California court granted final approval to the settlement.

In re iPod Cases, JCCP No. 4355 (Cal. Super. Ct. San Mateo Cty). Mr. Gibbs, as court appointed co-lead counsel, negotiated a settlement that provided warranty extensions, battery replacements, cash payments, and store credits for class members who experienced battery failure. In approving the settlement, the Hon. Beth L. Freeman said that the class was represented by "extremely well qualified" counsel who negotiated a "significant and substantial benefit" for the class members.

Roy v. Hyundai Motor America, No. 05-cv-00483 (C.D. Cal.). Gibbs Law Group attorneys served as co-lead counsel in this nationwide class action suit brought on behalf of Hyundai Elantra owners and lessees, alleging that an air bag system in vehicles was defective. Our attorneys helped negotiate a settlement whereby Hyundai agreed to repair the air bag systems, provide reimbursement for transportation expenses, and administer an alternative dispute resolution program for trade-ins and buy-backs. In approving the settlement, the Honorable Alicemarie H. Stotler presiding, described the settlement as “pragmatic” and a “win-win” for all involved.

Velasco v. Chrysler Group LLC, No. 2:13-cv-08080 (C.D. Cal.). In this class action, consumers alleged they were sold and leased vehicles with defective power control modules that caused vehicle stalling. Gibbs Law Group attorneys and their co-counsel defeated the majority of Chrysler’s motion to dismiss and engaged in extensive deposition and document discovery. In 2015, the parties reached a settlement contingent on Chrysler initiating a recall of hundreds of thousands of vehicles, reimbursing owners for past repairs, and extending its warranty for the repairs conducted through the recall. When he granted final settlement approval, the Honorable Dean D. Pregerson acknowledged that the case had been “hard fought” and “well-litigated by both sides.”

Edwards v. Ford Motor Co., No. 11-cv-1058 (S.D. Cal.). This lawsuit alleged that Ford sold vehicles despite a known safety defect that caused them to surge into intersections, through crosswalks, and up on to curbs. The litigation twice went to the U.S. Court of Appeals for the Ninth Circuit, with plaintiff prevailing in both instances. In the first instance, the appellate court reversed the trial court’s denial of class certification. In the second, the Ninth Circuit affirmed the ruling below that plaintiff’s efforts had generated free repairs, reimbursements, and extended warranties for the class.

Sanborn, et al. v. Nissan North America, Inc., No. 00:14-cv-62567 (S.D. Fla.). Gibbs Law Group litigated this action against a vigorous defense for two years, seeking relief for Nissan Altima owners whose dashboards were melting into a sticky, shiny, gooey surface that they alleged caused a substantial and dangerous glare. After largely prevailing on a motion to dismiss, Gibbs Law Group attorneys and their co-counsel prepared the case to the brink of trial, reaching a settlement just ten days before the scheduled trial start. The settlement allowed class members to obtain steeply discounted dashboard replacements and reimbursement toward prior replacement costs.

Bacca v. BMW of N. Am., No. 2:06-cv-6753 (C.D. Cal.) In a class action alleging that BMW vehicles suffered from defective sub-frames, we negotiated a settlement with BMW in which class members nationwide received full reimbursement for prior sub-frame repair costs as well as free nationwide inspections and program.

Government Reform

Paeste v. Government of Guam, No. 11-cv-0008 (D. Guam); Gibbs Law Group attorneys and co-counsel served as Class Counsel in litigation alleging the Government of Guam had a longstanding practice of delaying tax refunds for years on end, with the Government owing over \$200 million in past due refunds. After certifying a litigation class, Plaintiffs prevailed on both of their claims at the summary judgment stage, obtaining a permanent injunction that reformed the government’s administration of tax refunds. The judgment and injunction were upheld on appeal in a published decision by the Ninth Circuit. *Paeste v. Gov’t of Guam*, 798 F.3d 1228 (9th Cir. 2015).