

**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

**PLAINTIFFS' MOTION FOR ATTORNEY'S FEES  
AND EXPENSE REIMBURSEMENTS**

Plaintiffs' counsel have devoted 2,636 hours over the past three years, and incurred \$55,100.08 in litigation costs, representing 2015 CR-V owners in their efforts to obtain relief from severe vibrations. Those efforts have succeeded, as Honda is now required to widely publicize that free repairs are available—including by sending letters to thousands of CR-V owners who were previously told that their vehicles were not defective and warranty repairs were unavailable.

Plaintiffs now respectfully apply to the Court for an order awarding Class Counsel \$1,368,774.08 in attorney's fees and expense reimbursements pursuant to the Magnuson-Moss Warranty Act, 15 U.S.C. § 2310(d)(2), and the following state fee-shifting statutes: Cal. Civil Code § 1780(e); Cal. Code Civ. Proc. § 1021.5, Colo. Rev. Stat. § 6-1-113(2)(b); Fla. Stat. Ann. § 501.2105; 815 Ill. Comp. Stat. Ann. § 505/10a(c); Me. Rev. Stat. Ann. tit. 5 § 213(2); Mass. Gen. Laws ch. 93A, § 9(4); Mich. Comp. Laws Ann. § 445.911(2); N.Y. Gen. Bus. Law §§ 349(h), 350-e(3); Ohio Rev. Code § 1345.09(F); Or. Rev. Stat. § 646.638(3); R.I. Gen. Laws § 6-

13.1-5.2(d); Tex. Bus. & Com. Code § 17.50(d); Va. Code Ann. § 59.1-204(B); Wash. Rev. Code § 19.86.090. A Memorandum in Support is below.

Dated: July 10, 2018

Respectfully submitted,

/s/ Eric. H. Gibbs

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*Class Counsel*

**MEMORANDUM IN SUPPORT**

**I. INTRODUCTION**

When Class Counsel began working on this case three years ago, 2015 Honda CR-V owners around the country were in need of a solution. They were reporting a pronounced shuddering in their recently purchased vehicles that far exceeded normal idle vibrations. They complained that the vibration distracted them while driving and drew concerned comments from passengers. In response, Honda dealerships told customers that the vibrations were normal and that there was no fix. Honda's corporate offices were no help either. Even after Class Counsel sent a pre-litigation demand letter, Honda still did nothing to help its customers.

Vehicle owners reacted by filing multiple class action lawsuits. Several months later, Honda introduced repairs to address the vibration. While the repair procedures were typically effective, many CR-V owners did not know they were available. Many owners had already sought repairs and given up after Honda repeatedly denied that anything was wrong. By introducing new repairs but failing to publicize them, Honda effectively limited the number of CR-Vs it would have to fix. At the same time, Honda was able to use the availability of those repairs to argue that the class's claims were not yet ripe, and therefore should be dismissed.

Class Counsel have succeeded in requiring Honda to widely publicize its vibration repairs, including by sending letters to the thousands of CR-V owners who previously complained about vibrations to no avail. Honda is also sending quarterly notices to dealerships to reiterate that repairs are available, and anyone who Googles "2015 CR-V vibration" during the next year will learn about the repairs. These notices also bind Honda to covering the vibration repairs under its extended warranties, making them free to consumers for years to come.

Obtaining this result for CR-V owners was a multi-year effort. Plaintiffs' counsel devoted

2,636 hours and spent \$55,100.08 in connection with the litigation. They now ask that the Court grant their request for \$1,368,774.08 in fees and expense reimbursements. Federal warranty law and state consumer protection statutes provide for payment of attorney's fees and expense reimbursements to counsel who succeed in obtaining relief on behalf of consumers. Those fee awards are intended not only to compensate counsel who have already taken on consumers' cause and borne the risk of receiving nothing if their efforts failed, but also to incentivize others to pursue the same sort of publicly beneficial lawsuits in the future.

The award that Class Counsel seek is on the moderate end of the spectrum for a multi-state automotive class action. They have already reduced the hours for which they seek compensation by over 15%. And their hourly billing rates are market rates that fall within the range of rates previously approved by courts within this Circuit for complex, multi-district consumer litigation. The lodestar value of counsel's work using these figures is \$1,313,674. They request that the Court award them that same amount, with \$55,100.08 added to reimburse them for the expenses they incurred to prosecute the case. They do not seek a fee multiplier unless the Court finds a multiplier necessary to compensate them appropriately.

## **II. OVERVIEW OF THE LITIGATION AND CLASS COUNSEL'S WORK**

Because Class Counsel request an attorney's fee reimbursement under the lodestar method—which hinges primarily on the number of hours that counsel reasonably expended during the litigation—this overview section of the brief focuses on how Class Counsel spent their time during this litigation. More detail about their efforts can be found in the supporting declarations of David Stein and Mark Troutman.

### **A. Pre-filing Investigation and Early Litigation (June 2015 – December 2015)**

Class Counsel's efforts began in June 2015, when they first spoke with owners of new 2015 Honda CR-Vs who reported that their vehicles were vibrating, particularly at low speeds.

CR-V owners reported that the vibration was substantially worse than they expected from a new vehicle, that it disturbed 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 off dealership lots, and in addition to those who contacted Class Counsel directly, many other owners complained in online forums and to the National Highway Traffic Safety Administration (NHTSA). Thousands of CR-V owners 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. (Stein Decl., ¶ 3.)

Class Counsel has considerable experience investigating consumer complaints about automobiles, and they used that experience here by delving into relevant automotive industry literature on the systems, components, and symptoms at issue, and consulting with an automotive expert to better understand the underlying problem. Class Counsel concluded that the complaints were sufficiently numerous and serious, and sent Honda a pre-suit demand letter as required under California’s Consumers Legal Remedies Act (and certain warranty statutes). Honda responded to the demand weeks later, declining to resolve CR-V owners’ grievances, saying there was “no defect” and that it was not willing to take remedial action. (*Id.*, ¶ 4.)

Given Honda’s express unwillingness to make things right voluntarily, Class Counsel filed suit on behalf of CR-V owners on July 7, 2015. Class Counsel’s pre-suit investigation and research allowed them 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; (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 CR-V was not equipped with vibration dampening components such as hydraulic mounts. (*Id.*, ¶ 5.) The Court later recognized that “the work [lead counsel] 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. (ECF No. 15 at 3.)

After filing suit, Class Counsel 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. As the number of cases increased, Class Counsel initiated the multidistrict litigation process by filing a motion to centralize and transfer the related cases (which required filing both opening and response briefs as well as arguing the issue before the Judicial Panel on Multidistrict Litigation). Once the many cases were centralized before this Court, Class Counsel took the lead in preparing and finalizing the initial joint agenda submitted to the Court; participated in two initial status conferences; and prepared and filed the motion to serve as lead counsel on behalf of the proposed class, which the Court granted on December 18, 2015. (ECF No. 15.) During that time, Class Counsel also continued their factual investigation with an eye toward amending the complaint. (Stein Decl., ¶ 6.)

Altogether, Class Counsel devoted 401 hours to the case during this initial phase of the litigation. (Stein Decl., ¶ 14; Troutman Decl., ¶ 10.) As with each of the other time periods described herein, additional detail about the tasks undertaken, a breakdown of the hours spent by each respective attorney, and all daily time entries can be found in Class Counsel’s accompanying declarations. (Stein Decl., ¶¶ 15-16, Ex. A; Troutman Decl., ¶ 11, Ex. A.)

**B. Pleadings Phase and Early Discovery (December 2015 – May 2016)**

In November 2015, after the Judicial Panel on Multidistrict Litigation centralized the

litigation in this Court, Honda released a Technical Service Bulletin that instructed dealerships which repairs to perform when a 2015 CR-V owner complains about vibrations. By that time, though, most 2015 CR-Vs had been sold and numerous owners suffering from vibration had already been turned away without receiving repairs. Even so, Honda chose not to publicize the availability of new repairs: it did not contact the drivers who had already complained and made no real effort to communicate with customers who had been told once that nothing could be done to improve their vehicle's performance. In addition, the warranty coverage for vibration repairs remained poorly understood. The repair bulletin said only that the "normal warranty applies"—an ambiguous statement considering that Honda issues multiple warranties with its vehicles and drivers had been repeatedly told that no warranty repairs were available. (Stein Decl., ¶ 7.)

During the months that followed, Class Counsel focused largely on obtaining information to gauge whether Honda's new repairs were effective and, if so, what more could be done to benefit class members. (*See, e.g.*, ECF 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").) Class Counsel reviewed documents and information that Honda produced in discovery; continued their independent investigation; continued to work with an automotive consultant to understand the information they had received and to formulate additional requests; and spoke with many dozens of class members who told Class Counsel 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, Class Counsel 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 free under warranty. Getting proper notice to vehicle owners about the availability of the repairs thus became Class Counsel's major priority. (Stein Decl., ¶ 8.)

At the same time, Honda continued to mount a strenuous defense. After Class Counsel prepared and filed a consolidated amended complaint (and later a second amended complaint) on behalf of 16 class representatives from 14 states across the country, Honda filed a motion to dismiss under Rules 12(b)(1) and 12(b)(6). (*Id.*, ¶ 9.) 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. (ECF No. 35.) 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. (ECF No. 46 at 1.)

During this phase of the litigation, which was among the busiest in the case, Class Counsel devoted 618 hours of attorney and paralegal time. In addition to pleading and motion practice, they began the discovery process in earnest. (Stein Decl., ¶ 14; Troutman Decl., ¶ 10.) They worked with Honda to develop a discovery plan and case schedule, negotiated a protocol for electronic discovery and procedures for handling confidential material, prepared Plaintiffs' initial disclosures, worked with the 16 class representatives to search for and produce documents, prepared detailed discovery requests, and conferred with Honda regarding its initial responses. (Stein Decl., ¶¶ 17-18.)

**C. Honda's Motion to Arbitrate, Continued Discovery and Early Settlement Efforts (June 2016 – March 2017)**

After filing its motion to dismiss, Honda took intensive written discovery of three class



representatives—requiring each of them to answer 24 interrogatories and between 66 and 68 document requests. Plaintiffs’ responses required considerable time and coordination, and ultimately led to the production of over one thousand pages of documents. Next, Honda demanded inspections of several class representatives’ vehicles, which required Class Counsel to negotiate an inspection protocol, retain an expert to attend inspections, and travel to oversee the inspections. (Stein Decl., ¶ 10.) Honda also filed a separate motion seeking to compel arbitration of several plaintiffs’ claims. (ECF No. 51.) This too required an opposition brief dealing with a variety of complex legal issues, as well as factual issues surrounding the vehicle purchases and the governing contracts. (ECF No. 64.)

In August 2016, after undertaking the time-intensive litigation and discovery efforts described above, 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, Class Counsel’s subsequent telephone discussions with Honda’s counsel, and the exchange of a formal settlement demand and response, the parties concluded that mediation was likely to be productive. In the ensuing months prior to the mediation, Class Counsel continued with discovery—focusing in particular on obtaining the documents and information that would help them prepare for the mediation. They also continued to speak with many of the hundreds of class members who contacted them during the litigation, several of whom 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. (Stein Decl., ¶ 11.)

Following those efforts, Class Counsel participated in a two-day mediation in March 2017 with mediator Frank A. Ray. On the second day of the mediation, the parties 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 rights to seek remuneration, whether through the free ADR process available to them or some other mechanism. (Stein Decl., ¶ 11.)

Altogether, Class Counsel devoted 804 hours of attorney and paralegal time to this phase of the litigation. (Stein Decl., ¶¶ 19-20; Troutman Decl., ¶ 10.) In addition, at Class Counsel's request, Public Justice attorneys devoted 66.4 hours preparing an opposition to Honda's motion for arbitration. (Gilbride Decl., Ex. A; Stein Decl., ¶ 19, n.3.)

**D. Preparing and Negotiating the Settlement Agreement and Seeking Court Approval (March 2017 – Present)**

Although the parties had reached an agreement in principle to resolve the litigation, substantial work was needed to finalize the settlement. Class Counsel held a number of telephone calls with Honda's counsel to negotiate various details of the settlement. It took months to finalize the settlement agreement and exhibits (which together span over 100 pages). Class Counsel also held a third day of mediation in an unsuccessful attempt to resolve Plaintiffs' claim for attorney's fees and reimbursement of litigation expenses. (Stein Decl., ¶ 12.)

Once the settlement was finalized, Class Counsel prepared a motion for preliminary approval, followed by a motion for final approval and this motion for attorney's fees. Class Counsel have also worked with Honda's attorneys on a range of issues relating to the dissemination of settlement notice and communicating with clients and absent class members about the settlement. As of July 5, 2018, Class Counsel has spent 494 hours on this phase of the litigation. (Stein Decl., ¶¶ 21-22; Troutman Decl., ¶ 14.)

### **E. Communications With Class Members**

During the three-year duration of this litigation, Class Counsel has been contacted by approximately six hundred absent class members from around the country. To some degree Class Counsel's efforts in communicating with class members, such as the interviews they performed in connection with the amended complaint or in preparation for mediation, are reflected above. But class members also contacted Class Counsel at their convenience throughout the litigation to ask for status updates, advice about seeking repairs, and the like. These communications were not only part of Class Counsel's responsibility to keep class members informed about the litigation, but often proved to be highly useful as Class Counsel gauged the extent of the vibration complaints, class members' lack of familiarity with Honda's repairs, and the most pressing needs in settlement. As part of their efforts in this regard, Class Counsel posted a webpage to provide absent class members with information about the case, the vibration, and the repairs; sent out periodic email updates; and, most frequently, answered and responded to hundreds of class members' phone calls. In many such instances, Class Counsel was doing what Honda should have been doing on its own: informing drivers about the availability of the repairs. Altogether, Class Counsel spent 213 hours communicating with class members throughout the litigation and expect they will continue to do so throughout the customer outreach program. (Stein Decl., ¶¶ 23-24.)

### **III. BREAKDOWN OF CLASS COUNSEL'S PROPOSED LODESTAR FIGURES**

The following table lists the hours, billing rate, and resulting lodestar for each attorney and paralegal who worked on this case over the past three years. As of July 5, 2018, Class Counsel has spent 2,530 hours working on behalf of CR-V consumers. (Stein Decl., ¶ 27; Troutman Decl., ¶ 17.) In addition, Public Justice and other Plaintiffs' firms contributed an additional 106 hours. At Class Counsel's request, Public Justice took primary responsibility for

the opposition to Honda's motion to compel arbitration; Donovan Litigation Group (counsel in the *Kogan* case) was tasked by Class Counsel with identifying and interviewing potential testifying experts; and the Donovan, Chittur, Bell, Mendel, and Waddell firms each represented one of the 16 class representatives, and devoted time to keeping those clients informed about the litigation and discussing the proposed settlement with them. (Troutman Decl., ¶ 9, Exs. B-G; Gilbride Decl., Ex. A; Stein Decl., ¶ 19, n.3.)

Name	Title	Bar Date	Hours	Rate	Lodestar
<b><i>Gibbs Law Group LLP</i></b>					
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	--	44.3	\$190	\$8,417
			1799.6	\$520	\$935,426
<b><i>Isaac Wiles Burkholder &amp; Teetor LLC</i></b>					
Mark Troutman	Partner	2003	509.80	\$425	\$216,665
Gregory Travaglio	Of Counsel	1975	113.20	\$495	\$56,034
Shawn Judge	Of Counsel	1998	82.80	\$400	\$33,120
Matthew Teetor	Associate	2010	11.20	\$275	\$3,080
Becky Long	Paralegal	--	13.30	\$135	\$1,796
			730.30	\$425	\$310,695
<b><i>Public Justice, P.C.</i></b>					
Karla Gilbride	Staff Attorney	2008	66.3	\$685	\$45,416
Leslie Bailey	Staff Attorney	2004	0.5	\$730	\$365
			66.8	\$685	\$45,781
<b><i>Donovan Litigation Group, LLC</i></b>					
Michael Donovan	Member	1985	16.3	\$865	\$14,100
Christian Koerner	Paralegal	--	11.5	\$265	\$3,048
			27.8	\$617	\$17,147
<b><i>Chittur &amp; Associates, P.C.</i></b>					
Krishnan Chittur	Principal	1986	0.3	\$750	\$225

<b>Name</b>	<b>Title</b>	<b>Bar Date</b>	<b>Hours</b>	<b>Rate</b>	<b>Lodestar</b>
Andrey Strutinskiy	Associate	2004	0.4	\$350	\$140
			0.7	\$521	\$365
<b><i>Bell Law, LLC</i></b>					
Bryce Bell	Principal	2002	4.4	\$400	\$1740
<b><i>Mendel Law Firm, LLC</i></b>					
Thomas Mendel	Principal	2007	4.7	\$400	\$1880
<b><i>Waddell Law Firm LLC</i></b>					
A. Scott Waddell	Member	2002	1.6	\$400	\$640
<b>Total</b>			<b>2,635.9</b>	<b>\$498</b>	<b>\$1,313,674</b>

#### IV. LEGAL ARGUMENT

##### A. Plaintiffs Are Entitled To An Award of Attorney's Fees Using the Lodestar Method

Plaintiffs' case against Honda was based in part on the Magnuson-Moss Warranty Act, which provides for an award of attorney's fees if consumers prevail in their lawsuit. 15 U.S.C. § 2310(d)(2). Plaintiffs have indeed prevailed, as Honda is now committed to notify class members that vibration problems will be repaired free of charge under two Honda extended warranties and, should those repairs prove unsatisfactory to the consumer, any ongoing issues can be resolved through a free ADR process. It does not matter that this relief was obtained through settlement rather than through a final judgment, only that Plaintiffs obtained at least "some of the benefit the parties sought in bringing suit." *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983); *Hatfield v. Oak Hill Banks*, 222 F. Supp. 2d 988, 991 (S.D. Ohio 2002) (finding plaintiffs prevailed under the Magnuson-Moss Warranty Act by virtue of their settlement with defendants). Plaintiffs are also entitled to attorney's fees under state consumer protection statutes for the same reason, as each of those statutes include fee-shifting provisions that award attorney's fees to prevailing consumers. *See, e.g.*, Cal. Civil Code § 1780(e); 815 Ill. Comp. Stat. Ann. §

505/10a(c); Ohio Rev. Code § 1345.09(F); N.Y. Gen. Bus. Law § 349(h); Tex. Bus. & Com. Code § 17.50(d).

When it comes to calculating the amount of attorney’s fees to award Plaintiffs’ counsel, courts typically have discretion to choose between the lodestar method and the percentage method. *Gascho v. Glob. Fitness Holdings, LLC*, 822 F.3d 269, 280 (6th Cir. 2016). In this case, however, there is little doubt that the lodestar method is the appropriate way to calculate fees. The Magnuson-Moss Warranty Act specifically states that fees should be “based on actual time expended,” 15 U.S.C. § 2310(d)(2), and it’s generally recognized that the lodestar method better serves the purpose of state fee-shifting statutes, which are intended to “induce a capable attorney to take on litigation that may not otherwise be economically viable.” *Gascho*, 822 F.3d at 280. The percentage method, on the other hand, is most useful in cases that generate a common fund from which attorney’s fees can be paid, and here the class settlement does not provide for a common fund (and does not release class members’ rights to seek monetary relief)—instead the settlement provides injunctive relief that, while sorely needed by frustrated CR-V owners, is difficult to value monetarily. In cases like this one, where there is no common fund and the right to fees arises instead from fee-shifting statutes, “[i]t is well settled that the ‘lodestar’ approach is the proper method.” *Morse v. Specialized Loan Servicing, LLC*, No. 2:16-CV-689, 2018 WL 549372, at \*1 (S.D. Ohio Jan. 25, 2018), *report and recommendation adopted*, 2018 WL 1725693 (S.D. Ohio Apr. 10, 2018).

**B. Plaintiffs’ Proposed Lodestar Figure Is A Reasonable Valuation of The Legal Services Counsel Provided to CR-V Consumers**

To calculate counsel’s lodestar, the Court multiplies “the number of hours reasonably expended on the case ... by the attorney’s reasonable hourly rate.” *Amos v. PPG Indus., Inc.*, No. 2:05-CV-70, 2015 WL 4881459, at \*9 (S.D. Ohio Aug. 13, 2015). Plaintiffs have proposed

lodestar figures for each attorney and paralegal who worked in the case, which if accepted by the Court would result in a total lodestar of \$1,313,674. (*See* Section III, *supra*.)

### **1. Counsel's Time Was Reasonably Spent**

Over the past three years, Plaintiffs' counsel have spent 2,636 hours working on behalf of CR-V owners. To assist the Court in evaluating the reasonableness of these hours, Class Counsel have provided the Court with:

- (i) an overview of their work in the case (*see* Section II, *supra*; Stein Decl., ¶¶ 3-13; Troutman Decl., ¶¶ 3-8; Gilbride Decl., ¶ 8);
- (ii) a detailed list of the major tasks accomplished at each stage in the litigation (Stein Decl., ¶¶ 14-24);
- (iii) a breakdown of their hours by timekeeper for each phase of the litigation (*id.*; Troutman Decl., ¶¶ 11-14); and
- (iv) each timekeeper's daily time records (Stein Decl., Ex. A; Troutman Decl., Exs. A-G; Gilbride Decl., Ex. A.).

*See Imwalle v. Reliance Med. Prod., Inc.*, 515 F.3d 531, 553 (6th Cir. 2008) (“[T]he documentation offered in support of the hours charged must be of sufficient detail and probative value to enable the court to determine with a high degree of certainty that such hours were actually and reasonably expended in the prosecution of the litigation.”).

Plaintiffs also asked Keith W. Schneider, a well-respected attorney with nearly 30 years of experience, to review Class Counsel's time records and opine on its reasonableness. “Based on [his] knowledge of and experience with class actions,” Mr. Schneider concluded that “the work performed by Lead Counsel and Liaison Counsel on behalf of the class was necessary and reasonable.” (Schneider Decl., ¶ 10; *see also* ¶¶ 11-12.)

In assessing whether counsel's time was indeed reasonably spent, the Court may also take into account its “overall sense of the suit” and “may use estimates.” *Fox v. Vice*, 563 U.S. 826, 838 (2011); *see, e.g., In re Ford Motor Co. Spark Plug & Three Valve Engine Prod. Liab. Litig.*,

No. 1:12-MD-2316, 2016 WL 6909078, at \*10 (N.D. Ohio Jan. 26, 2016) (finding counsel’s time reasonably expended based, in part, on “Court’s own observations and knowledge of the complexity of the case”). The goal is “not to achieve auditing perfection,” but rather to do “rough justice.” *Fox*, 563 U.S. at 838. Toward that end, Plaintiffs have identified other recent automotive class actions that settled at a similar stage in the litigation:

<b>Case Name</b>	<b>Hours</b>	<b>Filing to Fee Application</b>
<i>Mendoza v. Hyundai Motor Co., Ltd</i> , No. 15-CV-01685-BLF, 2017 WL 342059, at *13-14 (N.D. Cal. Jan. 23, 2017)	1,962	5/7/15 - 9/28/16 (17 months)
<i>Yaeger v. Subaru of Am., Inc.</i> , No. 1:14-cv-4490-JBS, 2016 WL 4547126, at *2 (D.N.J. Aug. 31, 2016)	2,855	7/16/14 - 5/27/16 (22 months)
<i>Eisen v. Porsche Cars N. Am.</i> , No. 2:11-CV-09405-CAS, 2014 WL 439006, at *11 (C.D. Cal. Jan. 30, 2014); ECF No. 56	2,704	11/10/11 - 12/23/13 (25 months)
<i>In re Porsche Plastic Coolant Tubes</i> , No. 2:11-md-2233, ECF Nos. 180-81 (S.D. Ohio, March 19, 2014)	7,863	1/5/11 - 1/20/14 36 months
<i>Sadowska v. Volkswagen Grp. of Am.</i> , No. CV 11-00665-BRO, 2013 WL 9600948, at *1, *9 (C.D. Cal. Sept. 25, 2013)	3,115	1/21/11 - 7/20/13 (30 months)
<i>In re: American Honda Motor Co., Inc., CR-V Vibration Marketing and Sales Practices Litigation</i>	2,636	1/7/15 - 7/20/18 (36 months)

Of course, no case is exactly alike—each case poses its own unique challenges, and even cases of similar duration and subject matter will vary in particularities. But what is apparent from the above table is that even automotive class actions that settle at a relatively early stage still require a considerable amount of work. Extensive research and consultation with vehicle owners and automotive experts is required to prepare effective pleadings, the defendant automaker’s pleadings motions typically raise a plethora of complex issues, even preliminary discovery is often difficult to negotiate and proves technically complex, and negotiating an effective settlement requires careful coordination with vehicle owners, experts, and the defendant. In addition, when comprised of a multitude of cases, efforts by counsel are required for formal



coordination inside the courts as well as collaboration amongst various plaintiffs' firms outside the courts.

Class Counsel was able to achieve a high degree of efficiency in this case by limiting the number of firms involved in day-to-day litigation. The vast majority of the work was performed by lead and liaison counsel. (*See* Section III, *supra*.) When other firms were asked to contribute, it was because they offered additional efficiencies, or were working on discrete projects. For example, when opposing Honda's arbitration motion, Plaintiffs were able to utilize Public Justice's vast experience opposing similar motions. Class Counsel also reviewed their time records prior to submitting them to the Court and voluntarily reduced over 15% of their time to ensure that their proposed figures are reasonable. The end result is a total of 2,636 hours, which compares favorably to other automotive class actions that settled at a similar stage in the litigation.

## **2. Counsel's Hourly Rates Are Reasonable**

"For lodestar purposes, the Court determines an attorney's hourly rate using 'the market rate for an attorney of comparable skill and experience in the community in which the plaintiff brought the complaint.'" *Amos*, 2015 WL 4881459 at \*9. Here, the proper "community" is the national market for complex class action litigation. *See id.* (district courts may look to the national market, areas of specialization, or any other market they believe is appropriate). This litigation was not local in origin or scope. It began in the Central District of California and was soon followed by filings throughout the United States, which were then centralized before this Court by the Judicial Panel on Multidistrict Litigation. *See Eli Lilly & Co. v. Zenith Goldline Pharm., Inc.*, 264 F. Supp. 2d 753, 764 (S.D. Ind. 2003) ("distinctly 'national' litigation, such as multi-district litigation under 28 U.S.C. § 1407, may justify the use of essentially 'national' rates because the location of the forum court is fortuitous"). Plaintiffs from 14 different states alleged

causes of action under their home states' laws (in addition to federal law). Honda was defended by a prestigious national defense firm and by Los Angeles- and Chicago-based attorneys who specialize in complex litigation and consumer class actions. *See, e.g.,* [www.sidley.com/mallow-michael-1](http://www.sidley.com/mallow-michael-1), [www.sidley.com/kiser-liv](http://www.sidley.com/kiser-liv). And the resulting settlement will provide relief to consumers throughout the nation. *See In re Ford Spark Plug*, 2016 WL 6909078 at \*10 n.3 (adopting national hourly rates submitted by class counsel due to “the national scope of the litigation ... and the highly-specialized and talented opposing counsel”); *Lonardo v. Travelers Indem. Co.*, 706 F. Supp. 2d 766, 794 (N.D. Ohio 2010) (citing “expertise specific to complex class actions on a national scale” in adopting national rates submitted by class counsel).

The hourly rates proposed by Plaintiffs' lead counsel, Gibbs Law Group, reflect their experience litigating complex class actions on a nationwide basis. (*See* Stein Decl., ¶¶ 27-28, Ex. B (firm resume).) They range from \$550 to \$805 for partners, \$340 to \$415 for associates, and \$190 for the paralegal assigned to the case. These rates are set by counsel based on their own experience, periodic review of the rates charged by other attorneys involved in complex litigation, and survey results published by trade periodicals such as *The National Law Journal*. (*Id.*, ¶ 28.) The firm's rates are regularly evaluated and approved by courts across the country. (*Id.*, (citing, e.g., *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); *In re Peregrine Fin. Grp. Customer Litig.*, No. 12-cv-5546, ECF No. 441 (N.D. Ill. Oct. 15, 2015)).) The rates are also comparable to the rates approved in multi-district class actions centralized before courts in the Sixth Circuit, particularly given that market rates have increased since those cases concluded. *See In re Ford Spark Plug*, 2016 WL 6909078, at \*10; *id.*, No. 1:12-MD-2316, ECF Nos. 108-3 - 108-8 (Dec. 8, 2015) (adopting 2015 rates of \$400-\$875 for partners, \$295-

\$500 for associates, \$150-\$250 for paralegals; overall blended rate of \$510); *In re Porsche Cars N. Am. Inc., Plastic Coolant Tubes Prods. Liab. Litig.*, No. 2:11-md-2233, ECF Nos. 180-81 (S.D. Ohio, Mar. 19, 2014) (approving 2014 rates of up to \$910 for partners, \$575 for associates, and \$320 for paralegals); *Lonardo*, 706 F. Supp. 2d at 794 (adopting 2010 rates of \$325-\$825 for attorneys; \$90-\$215 for paralegals).

The hourly rates proposed by Plaintiffs' liaison counsel, Isaac Wiles Burkholder & Teetor, LLC are also reasonable, ranging from \$400 to \$495 for partners and of counsel, \$275 for the associate assigned to the case, and \$120 to \$135 for paralegals and law clerks. (Troutman Decl., ¶ 17.) The firm's rates are regularly evaluated and approved within this District, and the rates reflect both that the attorneys' practice is based in this District and their experience serving important roles in multi-district class action cases. (*Id.*, ¶¶ 18-20 (citing, e.g., *Gilbert v. Abercrombie & Fitch, Co.*, No. 2:15-cv-2854, 2016 U.S. Dist. LEXIS 103441, at \*40-41 (S.D. Ohio Aug. 5, 2016); *In re Porsche Cars*, No. 2:11-md-2233)).

The hourly rates proposed by Public Justice and the other Plaintiffs' counsel asked to assist in the case also should be approved as reasonable, as they fall within the range of national rates cited above. *See also, e.g.*, Gilbride Decl., ¶¶ 3-6 (providing firm and attorney qualifications); *Smith v. Leichtman*, No. 10-cv-00010, 2014 WL 12641576, at \*1 (N.D. Cal. Mar. 26, 2014) (approving 2014 rates for Donovan and Koerner); *Rahman v. The Smith & Wollensky Rest. Grp., Inc.*, No. 06 Civ. 6198, 2008 WL 1899938, at \*5 (S.D.N.Y. Apr. 29, 2008) (approving 2008 rate for Chittur); *Hayes v. I.C. Sys., Inc.*, No. 2:14-cv-2513, 2015 WL 506192, at \*7 (D. Kan. Feb. 6, 2015) (approving 2015 rates for Waddell and Bell).

### **3. The Ramey Factors Also Support Plaintiffs' Requested Fee**

When awarding fees pursuant to federal fee-shifting statutes, such as the Magnuson-Moss Warranty Act, "[t]he lodestar is strongly presumed to yield a reasonable fee." *Hatfield*, 222 F.

Supp. 2d at 990 (citing *City of Burlington v. Dague*, 505 U.S. 557, 562 (1992)). State fee-shifting statutes, on the other hand, typically authorize enhancements to the lodestar, in the form of a multiplier, to compensate counsel for the risk they take on in prosecuting publicly beneficial cases on a contingency basis. *See, e.g., Davis v. Mut. Life Ins. Co. of New York*, 6 F.3d 367, 383 (6th Cir. 1993) (Ohio Sales Practices Act “permits a trial court to award ... an enhancement where payment is contingent on outcome ...”); *Chavez v. Netflix, Inc.*, 162 Cal. App. 4th 43, 66 (2008) (affirming multiplier of 2.5 under California fee-shifting statutes).

Plaintiffs’ requested fee does not include a multiplier, though the Court remains free to award Class Counsel a multiplier if it finds it necessary to compensate them appropriately. For instance, if the Court were to calculate a lower lodestar than what Plaintiffs have proposed, the Court could still award Plaintiffs the full amount they are requesting by including a modest fee multiplier. “In determining whether a requested multiplier is appropriate,” courts may seek “guidance from the six factors identified by the Sixth Circuit in *Ramey v. Cincinnati Enquirer, Inc.*, 508 F.2d 1188, 1196 (6th Cir. 1974). *Lonardo*, 706 F. Supp. 2d at 795. Those six factors would support the use of a modest multiplier here:

1. The value of the benefits rendered to the class: The settlement negotiated by Class Counsel squarely addresses the consumer complaints that led to this lawsuit. CR-V owners are being notified that repairs are available to address vehicle vibrations, and those repairs are being provided free-of-charge under Honda’s extended warranties.

2. Society’s stake in rewarding attorneys who produce such benefits in order to maintain an incentive to others: This litigation benefited members of the public by enforcing important federal warranty laws and state consumer statutes. Not only do CR-V owners benefit, so too does the public at large, as lawsuits like this incentivize automakers to avoid selling defective

vehicles, notify their customers when defects are discovered, and fulfill their warranty promises by correcting those defects free of charge. Rewarding counsel who take on these types of complex, but publicly beneficial, cases through a fee multiplier helps ensure that they will continue to do so.

3. Whether the services were undertaken on a contingency basis: Class Counsel prosecuted this case wholly at their own expense and risked receiving nothing if they were unsuccessful. One of the primary purposes of a fee multiplier is to compensate counsel for taking on that contingency risk.

4. The value of the services on an hourly basis: The time that Class Counsel devoted to this case, when valued at market rates for their services, exceeds \$1.3 million. Had this litigation proved unsuccessful, Class Counsel would have recovered nothing for their services.

5. The complexity of the litigation: This lawsuit presented factual, legal, and procedural complexities. The nature of the vehicle defect at issue was highly technical, requiring Class Counsel to engage in technical research, gather information from numerous CR-V owners, and consult with an automotive expert. In addition, this litigation was comprised of several multidistrict cases, invoked the law of 14 different states, and required Class Counsel to navigate ripeness, standing, and arbitration issues.

6. The professional skill and standing of all counsel: Honda was represented by one of the premier firms in the country, featuring skilled litigators who specialize in defending complex consumer class actions. Countering Honda's skilled and well-financed counsel was not an easy task, and as this Court recognized when it initially appointed lead and liaison counsel, Class Counsel in this case have significant experience successfully resolving these types of automotive class actions.

**C. Plaintiffs Are Entitled to Reimbursement of Litigation Expenses**

As prevailing consumers, Plaintiffs are entitled to a recovery of all reasonably-incurred expenses under the Magnuson-Moss Warranty Act, 15 U.S.C. § 2310(d)(2). Many of the state consumer protection laws alleged in the operative complaint also authorize Plaintiffs' recovery of costs. *See, e.g.*, Colo. Rev. Stat. § 6-1-113(2)(b); Fla. Stat. Ann. § 501.2105; Mass. Gen. Laws ch. 93A, § 9(4); Tex. Bus. & Com. Code § 17.50(d); Wash. Rev. Code § 19.86.090.

Class Counsel have provided a breakdown of the expenses Plaintiffs incurred in connection with this litigation in their declarations. (*See* Stein Decl., ¶ 29; Troutman Decl., ¶ 22, Ex. E at 7.) These litigation expenses total \$55,100.08 and Class Counsel asks that they be awarded in full. To the extent that the Court finds any of these costs unrecoverable, they ask that the Court compensate Class Counsel for advancing these costs on behalf of the Class through a modest fee multiplier.

**V. CONCLUSION**

For the foregoing reasons, Plaintiffs respectfully requests that the Court grant their motion and award Class Counsel \$1,368,774.08 in attorney's fees and expense reimbursements.

Respectfully submitted,

Dated: July 10, 2018

/s/ Eric. H. Gibbs

Eric H. Gibbs (*pro hac vice*)  
David Stein (*pro hac vice*)  
Amy Zeman (*pro hac vice*)  
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*Class Counsel*

**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/ Eric H. Gibbs*  
\_\_\_\_\_  
Eric H. Gibbs (*pro hac vice*)  
*Class Counsel*



**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 MARK H. TROUTMAN  
IN SUPPORT OF ATTORNEY'S FEES AND COSTS**

I, Mark H. Troutman, declare as follows:

1. I am a Partner/Member at the law firm of Isaac Wiles Burkholder & Teetor, LLC, in Columbus, Ohio. Along with Eric Gibbs and David Stein from the Gibbs Law Group, Greg Travaglio from Isaac Wiles and I were appointed as Class Counsel for this case. I submit this Declaration based upon my personal knowledge, and, if called upon to do so, I would testify competently to the information set forth in this Declaration.

2. To help the Court's assessment of the reasonableness of my firm's lodestar, I have provided a variety of information below, including: a) a brief overview of my firm's role in the case; b) a summary of our time, which is broken down by each attorney in each phase of the litigation; and c) a lodestar calculation based upon that time and our current billing rates with further information in support of the reasonableness of our rates. The accompanying billing records provide detailed entries for each specific task performed.

**I. GENERAL OVERVIEW**

3. Our efforts in this case began when other Plaintiffs' lawyers in the case contacted one of my partners at Isaac Wiles to inquire about our serving as co-counsel with them. We began investigating the potential claims in June 2015 and filed a Complaint in the United States District Court for the Southern District of Ohio on July 15, 2015.

4. Within a week of filing Mr. Maticcik's Complaint, Mr. Gibbs and Mr. Stein moved to have all the cases consolidated in the United States District Court for the Central District of California.

5. Greg Travaglio and I responded to the motion to consolidate the cases in California with a brief arguing that the Joint Panel for Multi-District Litigation consolidate the cases in this Court. Soon after oral argument, the JPML entered an Order transferring all cases to this Court.

6. Greg Travaglio and I sought and were subsequently appointed to the role of Liaison Counsel based upon our experience and qualifications in the consumer class action practice area, as well as our knowledge of the federal district court, its rules, and practice therein.

7. I have reviewed Mr. Stein's Declaration and incorporate all other background and overview as re-written here for the purpose of avoiding redundancy and repetition.

## II. SUMMARY OF EFFORTS BY LITIGATION PHASE

8. As Mr. Stein noted in his Declaration, this Court appointed Eric Gibbs and him from the Gibbs Law Group as Lead Counsel in this litigation. The Court also appointed Isaac Wiles as Liaison Counsel. In this Class Counsel relationship, Isaac Wiles attorneys and staff worked hand in hand with Lead Counsel in a supporting capacity, with Lead Counsel directing select projects and tasks to Liaison Counsel. As requested, Isaac Wiles provided strategy, contributed advice on local practice, and served as a contact point with the Court. Isaac Wiles also provided secondary drafting, research, and editing work as requested. Finally, Isaac Wiles provided coordinating and timekeeping functions, serving as a conduit for non-lead and non-liaison counsel to coordinate work and report time and expenses to Lead Counsel.

9. In my capacity as Liaison Counsel, I received reports from other plaintiffs' counsel on the time they were devoting to the litigation. Attached as **Exhibits B - G** are the billing records and summary reports I received from Michael Donovan and his associated counsel (counsel in the *Kogan* case), as well as Bryce Bell and his associated counsel (counsel in the *Bertram* case). I understand that both the *Kogan* and *Bertram* counsel were retained by individuals who served as class representatives and who executed the settlement agreement; that *Kogan* counsel were additionally delegated by lead counsel with assisting in identifying and interviewing potential testifying experts; and that collectively the *Kogan* and *Bertram* counsel spent 39.2 hours on these activities, giving rise to a lodestar of \$14,662.00.

10. To assist the Court in evaluating the reasonableness of the time that Isaac Wiles devoted to this case on behalf of the class, I have broken the litigation into the same 5 phases that Mr. Stein did in his Declaration. To present our time in a manner that I believe is most helpful to the Court, the following phases are, for the most part, chronologically distinct.

Description	Phase	Hours	Lodestar
<b>A. Investigation and Complaint, JPML, and early litigation</b>	June 2015 – December 2015	167.4	\$72,531.00
<b>B. Consolidated Complaint, motion to dismiss, and early discovery</b>	December 2015 – May 2015	176.9	\$74,380.00
<b>C. Arbitration motion, further discovery, and early settlement efforts</b>	June 2015 – March 2017	213.40	\$91,215.50
<b>D. Settlement agreement and motions</b>	March 2017 – present	172.60	\$72,568.00
<b>E. Communicating with Class Members</b>	Throughout	Included above	Included above
<b>TOTAL</b>		730.30 <sup>1</sup>	\$310,694.50

**A. Investigation and Complaint, JPML, and early litigation**

11. The table below shows the hours contributed to the case by each of the Isaac Wiles attorneys who worked on the case during this phase. The accompanying billing records provide detailed entries for each specific task performed.

Name	Title	Bar Date	Hours
Mark Troutman	Partner	2003	112.4
Gregory Travalio	Of Counsel	1975	43.8

<sup>1</sup> As referenced below, the client communication time for Isaac Wiles is estimated based upon its *de minimis* nature. As a result, the hours column totals 730.3 hours with the client communication time included.

Matthew Teetor	Associate	2010	11.2
TOTAL			167.4

**B. Consolidated Complaint, motion to dismiss, and early discovery**

12. The table below shows the hours contributed to the case by each of the Isaac Wiles attorneys who worked on the case during this phase. The accompanying billing records provide detailed entries for each specific task performed.

Name	Title	Bar Date	Hours
Mark Troutman	Partner	2003	133.2
Gregory Travalio	Of Counsel	1975	17.0
Shawn Judge	Of Counsel	1998	21.7
TOTAL			171.90

**C. Arbitration motion, further discovery, and early settlement efforts**

13. The table below lists the hours contributed to the case by each of the Isaac Wiles attorneys who worked on the case during this phase. The accompanying billing records provide detailed entries for each specific task performed.

Name	Title	Bar Date	Hours
Mark Troutman	Partner	2003	145.3
Gregory Travalio	Of Counsel	1975	34.0
Shawn Judge	Of Counsel	1998	30.3
TOTAL			209.6

**D. Settlement agreement and motions**

14. The table below lists the hours contributed to the case by each of the Isaac Wiles attorneys who worked on the case during this phase of the litigation. Pursuant to our standard practice, we continued to ensure that three of us did not bill for the same task on any file. When two people billed, we reviewed documents in different capacities with different goals. Our itemized fee statements confirm as much. These accompanying billing records provide detailed entries for each specific task performed.

Name	Title	Bar Date	Hours
Mark Troutman	Partner	2003	118.9
Gregory Travalio	Of Counsel	1975	18.4
Shawn Judge	Of Counsel	1998	30.8
TOTAL			168.1

**E. Communicating with Class Members**

15. As Lead Counsel, Mr. Stein's firm played a much greater role than our firm did with regard to communications with class representatives and class members. I was the only lawyer from the Isaac Wiles firm who communicated with any of the class representatives or absent class members. To narrow it down further, I only communicated with Plaintiffs Maticcik and Prychitko. I spoke with a few other putative class members who reached out to learn about the case. I would estimate that my total time spent with class members, including both class representatives and absent class members, does not exceed 10 hours. All such communications are itemized in detail in the attached fee and cost statements.

### III. HOURLY RATES AND LODESTAR CALCULATIONS

16. Throughout the course of litigation this case, Isaac Wiles attorneys and one paralegal have devoted a total of 730.30 hours to this litigation, with a total lodestar of \$310,694.50. This equates to an overall blended rate of \$425.00. A true and accurate copy of our time records is attached as **Exhibit A**.

17. I have personally reviewed my firm's time records, which were maintained contemporaneously since this matter started. The totals I report in this Declaration are actually *lower* than the total time invested in this case because I have already gone through our time records in detail and exercised billing discretion to subtract time in areas that seemed in excess or duplicative. I can confidently assert that the lodestar and hours reported in my Declaration as reasonable and conservative with the distribution set forth in the table below:

<b>Name</b>	<b>Title</b>	<b>Bar Date</b>	<b>Hours</b>	<b>Rate</b>	<b>Lodestar</b>
Mark Troutman	Member/Partner	2003	509.80	\$425	\$216,665.00
Gregory Travalio	Of Counsel	1975	113.20	\$495	\$56,034.00
Shawn Judge	Of Counsel	1998	82.80	\$400	\$33,120.00
Matthew Teetor	Associate	2010	11.20	\$275	\$3,080.00
Becky Long <sup>2</sup>	Paralegal	N/A	13.30	\$135	\$1,795.50
<b>Total</b>			730.30		\$310,694.50

<sup>2</sup> As a paralegal, Ms. Long's hours are not included in the phased subtotals in the preceding section.

18. The hourly rates charged by Isaac Wiles are reasonable for several reasons. *First*, the rates charged by Isaac Wiles are its customary hourly rates that it bills in its class action and complex litigation practice across the country. The rates in this practice do not change based upon jurisdiction. Importantly, this Court has approved Isaac Wiles' fees within the range submitted here in recent cases. *See, e.g., In re: Porsche Cars N. Am., Inc., Plastic Coolant Tubes Prod. Liab. Litig.*, Case No. 2:11-md-2233 (S.D. Ohio); *Gilbert v. Abercrombie & Fitch, Co.*, No. 2:15-cv-2854, 2016 U.S. Dist. LEXIS 103441, at \*55 (S.D. Ohio Aug. 5, 2016).

19. *Second*, the hourly rates charged by Isaac Wiles are reasonable in light of its highly specialized skill and experience, and national reputation in complex litigation. Mr. Travaglio, Mr. Judge, and I play prominent and various roles in complex class action cases from California to Virginia. We serve as Co-Lead Counsel, Local/Liaison Counsel, and on Executive Committees in large cases, leading or assisting in them as the role demands. All of the lawyers who worked on this file have combined decades of experience practicing locally in the Southern District of Ohio. This experience helped them to serve co-counsel from remote jurisdictions well in terms of local practice and rules.

20. *Third*, the hourly rates charged by Isaac Wiles are consistent with the rates for similar services by lawyers of reasonably comparable skill, experience, and national reputation.

21. The Isaac Wiles firm undertook this litigation on an entirely contingent basis and have not been paid for any of its work, nor have any of Isaac Wiles' costs or expenses been reimbursed. My firm undertook the litigation of the Action with the expectation that it would have to devote many hours of hard work to the prosecution of a case involving complex factual and legal issues without any guarantee of successful resolution or of compensation for these efforts. The prosecution of the Action involved the expenditure of significant resources,



including the time spent by attorneys and professional staff, as well as the substantial expenses that were incurred during the litigation, for which my firm received no compensation during the course of litigation.

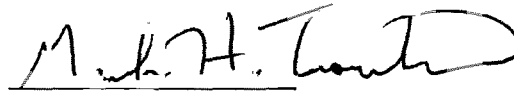
#### IV. SUMMARY OF EXPENSES

22. The Isaac Wiles firm has incurred \$4,866.41 of litigation expenses to prosecute this case, as reflected in the following table:

<b>CLIENT COSTS/EXPENSES</b>	<b>TOTAL</b>
Telefax charges	0
Postage, shipping, and certified mail	0
Printing and photocopying (in-house)	\$78.00
Computerized Research (Lexis/Westlaw)	\$91.30
Telephone – Long Distance (actual charges only)	0
Travel	\$2,893.19
Meals (During travel and working meals)	\$1,403.92
Experts and Consultants	0
Depositions and Court Costs	\$400.00
MDL Assessments	0
<b>TOTAL</b>	<b>\$4,866.41</b>

23. All of the costs and expenses in the Table above were reasonable and necessary to prosecute this litigation.

24. 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 Columbus, Ohio.

A handwritten signature in black ink, appearing to read "Mark H. Troutman". The signature is written in a cursive style with a large, sweeping "T" at the end.

Mark H. Troutman

**EXHIBIT A**

**Isaac Wiles Burkholder & Teetor, LLC**

**ATTORNEYS AT LAW**

Two Miranova Place, Suite 700  
Columbus, OH 43215-5098  
Phone: (614) 221-2121  
Fax: (614) 365-9516  
Employer ID Number: 46-2505333

July 5, 2018

JOHN D. MATISCIK  
23961 STEWARD CT.  
GALENA, OH 43021

Invoice# 59948 ANY  
Our file# 09498 00001  
Billing through 06/30/2018

AMERICAN HONDA MOTOR COMPANY CLASS-ACTION MATTER  
CASE NO: NO FILINGS TO DATE  
COURT: N/A

BALANCE FORWARD	\$	0.00
Payments received since last invoice		0.00
		-----
NET BALANCE FORWARD	\$	0.00
Prepaid balance carried forward		0.00
Total New Fees for this Matter		310,694.50
Total New Disbursements for this Matter		4,866.41
		-----
TOTAL BALANCE DUE	\$	315,560.91

**PLEASE REMIT THIS PAGE WITH PAYMENT**

Isaac Wiles Burkholder & Teetor, LLC

ATTORNEYS AT LAW  
Two Miranova Place, Suite 700  
Columbus, OH 43215-5098  
Phone: (614) 221-2121  
Fax: (614) 365-9516  
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JOHN D. MATISCIK  
23961 STEWARD CT.  
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Invoice# 59948 ANY  
Our file# 09498 00001  
Billing through 06/30/2018

AMERICAN HONDA MOTOR COMPANY CLASS-ACTION MATTER  
CASE NO: NO FILINGS TO DATE  
COURT: N/A

PROFESSIONAL SERVICES

06/16/15	MHT	Initial receipt and review of Complaint and facts of case (1.5). T/C with potential co-counsel regarding case background and claims (0.3).	1.80 hrs	765.00
06/18/15	MHT	Begin review/evaluation of draft Complaint from Mr. Meyers (0.5). Reviewed case with management regarding approval to become involved (0.3).	0.80 hrs	340.00
06/19/15	MHT	Correspond with Mr. Meyers regarding coordination of filings and role in case (0.4). T/C with co-counsel regarding planning for Complaint and involvement in case (1.6).	2.00 hrs	850.00
06/22/15	MHT	Edited and planned regarding draft Complaint (0.5). Drafted memo for internal approval (0.4).	0.90 hrs	382.50
06/23/15	MHT	Continued review/edits to draft Complaint.	1.40 hrs	595.00
06/24/15	MHT	Continued review/edits to Ohio Complaint (1.5). Researched for Complaint (1.4). Direction to law clerk regarding research and background investigation for Complaint (0.2).	3.10 hrs	1,317.50
06/25/15	MHT	Reviewed and added additional facts to Complaint.	1.70 hrs	722.50
07/02/15	MHT	Additional edits and research to draft Ohio Complaint (2.1). Prep / t/c with Mr. Meyer and others regarding efforts to finalize Complaint	2.50 hrs	1,062.50

09498	MATISCIK, JOHN D.	Invoice# 59948	Page 2
		and update regarding intended repairs to class vehicles (0.4).	
07/02/15	GMT	Review and edits to draft Complaint (3.0); conferences with Mark Troutman re edits to draft Complaint (.4); phone conference with co-counsel re draft Complaint (.4)	3.80 hrs 1,881.00
07/07/15	MHT	Continued research/investigation regarding filing of lawsuit and alleged repair (0.3). Researched damages issues raised by Defendant (0.7). Reviewed warranty info for impact on case (0.4). Research/draft for S.D. Ohio Civil Cover Sheet (0.3).	1.70 hrs 722.50
07/09/15	MHT	Continued review and investigation into additional facts to add to draft Complaint.	0.40 hrs 170.00
07/09/15	GMT	Conference and directions to Mark Troutman re draft Complaint.	0.10 hrs 49.50
07/10/15	MHT	Continued research/background to work on facts for Complaint (0.8). Correspond with co-counsel regarding Ohio Complaint edits (0.3). Reviewed/continued with edits to Ohio Complaint (1.4). Additional legal research regarding allegations in Complaint (0.7).	3.20 hrs 1,360.00
07/10/15	GMT	Conference with Mark Troutman re co-counsel questions (0.3); review and edits to draft Complaint (2.1); e-mail response to co-counsel questions (0.3).	2.70 hrs 1,336.50
07/14/15	GMT	Phone conference with Evan Meyers (0.2); review of Oakes' Complaint (0.6); edits to draft Complaint (0.7); final review of Complaint (0.3); e-mail to co-counsel regarding Complaint (0.3).	2.00 hrs 990.00
07/20/15	MHT	Strategy/email with Mr. Meyers regarding cooperation with and coordination of various cases to benefit Plaintiffs.	0.20 hrs 85.00
07/21/15	MHT	F/U with Mr. Meyer regarding planning/strategy regarding consolidation of case (0.7). Reviewed Motion by Girard Gibbs to consolidate before JPML (0.6).	1.30 hrs 552.50
07/22/15	MHT	Strategy regarding consolidation by MDL.	0.20 hrs 85.00
07/23/15	MHT	Prep/review of issues with consolidation before MDL as sought by Girard Gibbs (0.3). Research regarding JPML filings (0.6).	0.90 hrs 382.50
07/27/15	MHT	Reviewed/planned regarding MDL	0.90 hrs 382.50

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		consolidation papers (0.6). T/C with Mr. Meyers regarding consolidation issues and planning therefor (0.3).	
07/27/15	GMT	Conference with Mark Troutman re strategy for MDL (0.2); phone conference with co-counsel (0.3).	0.50 hrs 247.50
08/03/15	MHT	Reviewed MDL appearance and initial filing procedure (0.1). Reviewed/planned regarding filing and arguments regarding consolidation (0.2). Correspond with co-counsel and Mr. Meyers regarding above (0.2).	0.50 hrs 212.50
08/04/15	MHT	Further review/planning regarding consolidation issues and briefing with JPML (0.5). Call from Court and direction regarding filing and service issues (0.2). Review/research additional background regarding claims and science involved (1.1).	1.80 hrs 765.00
08/05/15	MHT	Research/planning regarding pleading issues and consolidation motion and Honda's position (2.0). T/C with Honda's counsel regarding joint motion for stay pending MDL consolidation determination (0.2). Correspond with Honda's counsel regarding stay pending consolidation (0.2). T/C with co-counsel regarding coordination (0.3).	2.60 hrs 1,105.00
08/05/15	MST	Research and draft memorandum regarding reasons MDL should choose southern district	1.70 hrs 467.50
08/06/15	MHT	Planning regarding extension of time for response to consolidation motion.	0.20 hrs 85.00
08/06/15	MST	Continue research concerning MDL venue selection, including flight research and Honda corporate structure/engineering locations	4.40 hrs 1,210.00
08/07/15	MHT	Drafted motion to extend time to respond regarding consolidation before JPML (0.3). Continued research regarding appropriate location for consolidation (0.5). Reviewed/edited Honda's proposed motion to stay S.D. Ohio case pending JPML consideration (0.2). Researched past consolidation cases regarding effect here (0.6).	1.60 hrs 680.00
08/07/15	MST	Additional research concerning Honda's fact book and where design facilities are located	0.80 hrs 220.00
08/10/15	MHT	Continued strategy/investigation regarding consolidation (0.9). Review/correspond with	1.10 hrs 467.50

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		Honda's counsel regarding approval to file joint motion for stay (0.2).	
08/10/15	GMT	Conference and direction to Mark Troutman re response to Girard Gibbs consolidation motion.	0.50 hrs 247.50
08/11/15	MHT	Researched authority and support regarding consolidation in S.D. Ohio vs. Central District of California vs. non-consolidation (4.6). T/Cs with various Plaintiffs' counsel regarding consolidation and amended complaint issues (0.4).	5.00 hrs 2,125.00
08/11/15	MST	Continue Honda research concerning proper venue for MDL panel	1.80 hrs 495.00
08/11/15	GMT	Conference with Mark Troutman re MDL strategy and upcoming phone call with co-counsel (0.4); phone conference with co-counsel re MDL strategy (0.5); phone call with Mark Landes (0.3); phone conference with co-counsel (0.5); conference with Mark Troutman re MDL (0.5).	2.20 hrs 1,089.00
08/12/15	MHT	Additional research/planning regarding consolidation vs. coordination of individual cases (0.5). Research/review Honda's connections to Ohio (1.1). Correspond with co-counsel regarding all of above (0.2).	1.80 hrs 765.00
08/12/15	MST	Finalizing memorandum concerning MDL venue selection for Ohio, including screen shots to multiple Honda websites	1.60 hrs 440.00
08/12/15	GMT	E-mails to co-counsel (2) regarding MDL (0.2); review of research (0.3).	0.50 hrs 247.50
08/13/15	MHT	Researched/drafted response to motion to consolidate and transfer (4.6). Reviewed new evidence regarding claims and proposed software fix (1.2).	5.80 hrs 2,465.00
08/13/15	MST	Finalize citations in memorandum regarding Ohio Engineering	0.60 hrs 165.00
08/13/15	MST	Finalize memo to file with analysis of LA Design Center versus Ohio Engineering via information from online Fact Book	0.30 hrs 82.50
08/13/15	GMT	Review and edits to brief for JPML (1.2); conference with Mark Troutman re JPML brief and strategy (0.2); e-mail to co-counsel re JPML brief and strategy for JPML hearing (0.2).	1.60 hrs 792.00



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08/14/15	MHT	Added additional sites and finalized response regarding consolidation and transfer before JPML (1.1). Evaluation of issues for hearing at JPML based upon parties involved and arguments (0.4). Reviewed JPML Hearing Order (0.3).	1.80 hrs 765.00
08/14/15	GMT	Review and edits to MDL draft.	0.30 hrs 148.50
08/17/15	MHT	Continued review/analysis of issues regarding MDL consolidation and hearing (0.3). Reviewed additional background regarding claims and Honda's press regarding purported fix (0.2).	0.50 hrs 212.50
08/18/15	MHT	Finalized issues with our MDL filing today (0.1). Planning regarding MDL issues (0.2). Received and reviewed other parties' MDL filings today (0.6).	0.90 hrs 382.50
08/19/15	MHT	Review/strategy with responses to MDL consolidation filings (0.3). Reviewed background and potential issues with consolidated complaint (0.6). Reviewed issues regarding cooperation with other cases (0.3).	1.20 hrs 510.00
08/19/15	GMT	Review of filings with JPML (1.0); conference with Mark Troutman re case strategy (0.3); e-mails to co-counsel regarding consolidation issues (0.2)	1.50 hrs 742.50
08/20/15	MHT	Reviewed and planned regarding claims post-consolidation and other litigation issues (0.4). Researched/planned regarding issues with potential non-consolidation (0.2).	0.60 hrs 255.00
08/21/15	MHT	Reviewed further support for consolidation in SD Ohio vs. C. D.C.	0.30 hrs 127.50
08/24/15	MHT	Reviewed issues with consolidation vs. non-consolidation with JPML.	0.40 hrs 170.00
08/24/15	GMT	Conference with Mark Troutman re preparation for JPML hearing.	0.30 hrs 148.50
08/25/15	MHT	Planning regarding coordination of all Plaintiffs' cases.	0.20 hrs 85.00
08/26/15	MHT	Review/planning regarding Girard Gibbs' reply regarding consolidation in CDC (0.3). Analysis of issues regarding consolidation for oral argument before MDL panel (0.5).	0.80 hrs 340.00
08/26/15	GMT	Conference with Mark Troutman re next steps (0.1); e-mail to co-counsel (0.1).	0.20 hrs 99.00

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09/01/15	GMT	Conference with Mark Troutman in preparation for phone conference with co-counsel -- strategy and next steps and preparation for MDL (0.6); review of case with Mark Troutman (0.3).	0.90	hrs	445.50
09/02/15	MHT	Prepare/review of issues and strategy for litigation (0.8). Prep / t/c with counsel from McGuire Law regarding JPML proceedings (0.5).	1.30	hrs	552.50
09/02/15	GMT	Conference with Mark Troutman to prepare for phone conference with co-counsel (0.8); phone conference with co-counsel (0.3).	1.10	hrs	544.50
09/03/15	MHT	Review/outline for JPML hearing (0.4). Reviewed filings needed regarding JPML consolidation argument (0.2).	0.60	hrs	255.00
09/10/15	MHT	Prepare Notice of Presentation of Oral Argument (0.2). Correspond with Mr. Meyers regarding case strategy (0.3). Researched newly-filed cases and background regarding Honda (2.2).	2.70	hrs	1,147.50
09/14/15	MHT	Review/strategy regarding oral argument notices (0.1). Reviewed finalized filings with JPML regarding oral argument (0.1). Reviewed other filings regarding oral argument before JPML (0.2).	0.40	hrs	170.00
09/15/15	MHT	Review/analysis of issues for oral argument before JPML.	0.70	hrs	297.50
09/15/15	GMT	Conference with Mark Troutman re next steps and e-mail to co-counsel (0.3); review of JPML filings (0.3).	0.60	hrs	297.00
09/17/15	MHT	Prep / t/c with other Plaintiffs' counsel regarding JPML hearing and coordination/consolidation issues.	1.20	hrs	510.00
09/17/15	GMT	Phone conference with co-counsel re upcoming JPML hearing (0.8); conference with Mark Troutman prior to call (0.3).	1.10	hrs	544.50
09/18/15	MHT	Prep / t/c with co-counsel regarding JPML hearing issues.	0.10	hrs	42.50
09/21/15	MHT	T/C with Evan Meyers regarding further planning for JPML hearing (0.2). Prep/review regarding CDC v. SD Ohio (0.3).	0.50	hrs	212.50
09/21/15	GMT	Phone conference with co-counsel.	0.50	hrs	247.50

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09/23/15	MHT	Review/prep/outline/research to prep for JPML hearing.	2.80 hrs		1,190.00
09/24/15	MHT	Continued research and prep for MDL hearing on consolidation/transfer (0.7). Reviewed notice of tag-a-long and FL Complaint (0.4).	1.10 hrs		467.50
09/27/15	MHT	Review/analysis for oral argument before JPML.	0.30 hrs		127.50
09/27/15	GMT	Review of draft JPML Argument.	0.50 hrs		247.50
09/28/15	MHT	Review/analysis of presentation before JPML (0.2). Reviewed FL Plaintiff's filing supporting S.D. Ohio (0.2).	0.40 hrs		170.00
09/29/15	MHT	Prep for issues before JPML, including oral argument (2.8). T/C with MR. Gibbs and planning regarding potential cooperation with all firms (0.3).	3.10 hrs		1,317.50
09/30/15	MHT	Ground travel and flights to Newark, NJ for hearing tomorrow before JPML (5.2). T/Cs with co-counsel regarding prep for consolidation hearing (0.2). Final prep for JPML hearing (2.4). T/C with Mr. Gibbs regarding prosecution strategy (0.4).	8.20 hrs		3,485.00
10/01/15	MHT	Prep/travel to/check-in for JPML hearing (2.5). Attended/presented of JMPL hearing (5.0). Air travel return to Columbus, Ohio (3.5).	11.00 hrs		4,675.00
10/01/15	GMT	Travel to New York City for JPML hearing (4.4); telephone conference with Eric Gibbs (0.4)	4.80 hrs		2,376.00
10/01/15	GMT	Phone conversation with Eric Gibbs (0.2); planning with Mark Troutman re ongoing efforts to cooperate (0.3).	0.50 hrs		247.50
10/01/15	GMT	Travel to JPML hearing (2.5); attend JPML Hearing (5.0); travel home from JPML hearing (3.5).	11.00 hrs		5,445.00
10/02/15	MHT	Reviewed likely outcomes/analysis from JPML hearing to plan ahead.	0.40 hrs		170.00
10/05/15	MHT	T/C with Mr. Meyer regarding coordination and consolidation issues.	0.40 hrs		170.00
10/06/15	MHT	Analyzed initial issues post-consolidation when litigation resumed.	0.40 hrs		170.00
10/09/15	MHT	Review/plan regarding JPML consolidation in SD Ohio.	0.40 hrs		170.00

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10/12/15	MHT	Planning regarding initial issues post-consolidation (0.8). Correspond with Mr. Meyer regarding next steps/planning (0.2). T/C with Mr. Meyer and Mr. McGuire regarding initial discussions regarding status conference with Judge Watson (0.4).	1.40 hrs 595.00
10/12/15	GMT	Phone conference with co-counsel regarding S.D. Ohio consolidation.	0.60 hrs 297.00
10/19/15	MHT	Review/respond with Honda's counsel regarding its inquiries on scheduling issues (0.3). Reviewed Judge Watson's initial case opening documents (0.3). Review/analyze Judge's Case Management Order No. 1 (0.3). Reviewed/outlined issues regarding teleconference on 10/22/15 with Judges (0.3).	1.20 hrs 510.00
10/20/15	MHT	Review/planning regarding email from Mr. Stein regarding initial status conference agenda (0.2). Drafted/planned regarding edits and items to consider regarding initial conference call with Judge (1.1). T/C with Mr. McGuire and Mr. Meyer regarding coordination and planning for 10/22/15 call with Court (0.4). Research/review regarding Rule 23(g) motion regarding liaison counsel (2.1).	3.80 hrs 1,615.00
10/20/15	GMT	Conference with Mark Troutman re strategy and Isaac Wiles' position in Honda case (0.8); conference with co-counsel re Isaac Wiles' position in Honda case (0.4); phone conference with Eric Gibbs regarding resuming litigation ((0.2); e-mails to Eric Gibbs (0.2); conference with Mark Troutman re phone calls with Eric Gibbs and co-counsel (.7).	2.30 hrs 1,138.50
10/21/15	MHT	Review/coordination of agenda for 10/22/15 call with Judge (1.1). Further research regarding Rule 23(g) motion for liaison counsel (1.5). Helped finalize/file agenda for status conference on 10/22/15 (.7). Correspond with co-counsel and Honda's counsel regarding coordination of agenda/hearing (0.2). Emailed Court regarding Initial Status Conference (.2). T/C with Honda's counsel regarding initial case planning (.3).	4.00 hrs 1,700.00
10/21/15	GMT	Preparation and telephone conference with opposing counsel regarding initial case planning.	0.80 hrs 396.00

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10/22/15	MHT	Prep/planning for call with Judges scheduled for today (0.4). Attended telephone pretrial conference, as scheduled by Judge Watson (0.3). Reviewed concerns regarding uniform presentation language (0.2). Edited preservation letter to provide sample to co-counsel (1.2).	2.10	hrs	892.50
10/22/15	GMT	Status conference with court (0.3); review and edits of e-mail to co-counsel regarding coordination (0.3); review of document retention letter (0.5).	1.10	hrs	544.50
10/23/15	MHT	Reviewed tasks to handle before 11/13/15 deadline regarding Rule 23(g) applications.	0.20	hrs	85.00
10/26/15	MHT	Review/prep regarding initial case work and delegation of responsibilities.	0.30	hrs	127.50
10/27/15	MHT	Review/plan/outline tasks to handle before and after co-lead appointed.	0.40	hrs	170.00
10/29/15	MHT	Reviewed Judge's Pretrial Order No. 1.	0.20	hrs	85.00
11/05/15	MHT	Reviewed coordination efforts regarding leadership (0.2). Correspond with co-counsel regarding leadership (0.2).	0.40	hrs	170.00
11/09/15	MHT	Continued work/outline for Rule 23(g) motion to serve as liaison counsel.	0.70	hrs	297.50
11/11/15	MHT	Correspond/coordinate leadership applications with other firms (0.2). Outlined issues to raise with liaison application (0.3). Began drafting Rule 23(g) application (0.5).	1.00	hrs	425.00
11/12/15	MHT	Continued research/drafting for R. 23(g) application (1.2). Review/planning regarding issues for leadership after appointment (0.6).	1.80	hrs	765.00
11/12/15	GMT	Review and edits to 23(g) motion.	0.60	hrs	297.00
11/13/15	MHT	Edited Exhibits for R. 23(g) Application (0.3). Final edits/review of Rule 23(g) Application before filing (0.4). Reviewed other Plaintiffs' lawyers' Rule 23(g) Application (0.4).	1.10	hrs	467.50
11/16/15	MHT	Correspond with Plaintiffs' counsel regarding issues with leadership applications (0.1). Reviewed assistance/steps needed for co-lead after appointment by Judge Watson (0.3).	0.30	hrs	127.50
11/16/15	GMT	Conference with Mark Troutman re leadership submissions and future coordination.	0.20	hrs	99.00
11/17/15	MHT	Review/evaluation of items to recommend to	0.30	hrs	127.50

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		co-lead for immediate handling.	
11/17/15	GMT	Conference with Mark Troutman re various duties as Liaison Counsel.	0.30 hrs 148.50
11/23/15	MHT	T/C with Mr. McGuire regarding update for agenda due to Court on 11/28/15 (0.2). Call from Mr. Stein regarding coordination of agenda (0.2). Reviewed Court Order regarding items for agenda and 12/1/15 status conference (0.3). Drafted proposed email to Judge Watson regarding agenda (0.2).	0.90 hrs 382.50
11/24/15	MHT	Correspond with all counsel regarding proposed agenda for 12/1/15 status conference (0.2). Drafted/forwarded agenda report to Judge Watson (0.1). Reviewed discovery issues to raise at earliest opportunity (0.2). T/C with Court regarding above (0.1).	0.60 hrs 255.00
11/24/15	GMT	Review and edits to e-mail regarding proposed agenda.	0.20 hrs 99.00
11/27/15	MHT	Correspond with Court regarding prep for status conference on 12/1/15.	0.20 hrs 85.00
11/30/15	MHT	Planning/coordination of status conference call with Judge and topics to consider for initial meet-and-confer (0.3). Correspond with Mr. Stein regarding planning for call with Judge Watson on 12/1/15 (0.2).	0.50 hrs 212.50
12/01/15	MHT	Prep/attended telephone status conference with Judge Watson.	0.50 hrs 212.50
12/01/15	GMT	Phone conference with Judge.	0.30 hrs 148.50
12/02/15	MHT	Review/research/locate purported service bulletin to study its effect on claims (0.6). Reviewed new TSB referenced by Honda's counsel during 12/1/15 status conference (0.6).	1.20 hrs 510.00
12/03/15	MHT	Reviewed Court's Pretrial Order No. 2.	0.10 hrs 42.50
12/09/15	MHT	Reviewed new direction regarding early ESI Orders and impact on procedure in S.D. Ohio.	0.30 hrs 127.50
12/10/15	MHT	Review / t/c with potential Michigan Plaintiff regarding status of case (0.2). Correspond with potential Michigan Plaintiff after f/u from call (0.1).	0.30 hrs 127.50
12/11/15	MHT	Review/correspond with potential Michigan Plaintiff regarding case (0.3). Prep / t/c with client listed above regarding background and	0.90 hrs 382.50

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					case history (0.6).
12/16/15	MHT	Reviewed issues with Defendant's purported fix and effect on case (0.2). Email with potential Michigan Plaintiff regarding his desire to get proposed repairs (0.1).	0.30	hrs	127.50
12/18/15	MHT	Review/evaluate Court's Order regarding leadership structure (0.4). Planning/strategy with assistance to co-lead counsel after Court's Order issued today (0.2).	0.60	hrs	255.00
12/21/15	MHT	Review/draft email to all Plaintiffs' counsel regarding evaluation of Plaintiffs for inclusion in Consolidated Amended Complaint per Mr. Stein's direction (0.2). Reviewed additional steps needed to prepare CAC (0.2).	0.40	hrs	170.00
12/21/15	GMT	Conference with Mark Troutman re next steps in litigation.	0.20	hrs	99.00
12/22/15	MHT	Review/evaluate issues with co-counsel and Plaintiffs regarding prep of CAC.	0.30	hrs	127.50
12/28/15	MHT	Review/plan regarding means to assist with CAC (0.2). F/U with other Plaintiffs' counsel regarding Plaintiffs' background for CAC (0.2). F/U email with Mr. Stein regarding agenda and list of attendees for next status conference due on 12/30/15 (0.2). T/C with co-counsel regarding Plaintiffs' involvement (0.2). Revise/forward sample protective order (0.9). Drafted protective order per Mr. Stein, as well as tolling agreement and agenda for conference call with Court (0.4).	2.10	hrs	892.50
12/28/15	GMT	Review and edits to stipulated protective order (0.2); e-mail to Mark Troutman regarding above (0.1); review and edits to Tolling Agreement (0.2).	0.50	hrs	247.50
12/29/15	MHT	Review/prep regarding agenda and items for status conference with Judge on 1/4/16 (0.5). T/C with Mr. Stein regarding status conference, discovery, and CAC (0.3). Reviewed options to recommend for timekeeping protocol (0.4).	1.20	hrs	510.00
12/29/15	GMT	Review of draft agenda (0.1); e-mail to co-counsel regarding agenda (0.1).	0.20	hrs	99.00
12/30/15	MHT	Review/research/assess proposed attorney fee submission protocol (0.2). Drafted new time and expense reporting protocol (1.4). Reviewed/evaluate Honda's proposed edits to	2.80	hrs	1,190.00



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Date	Timekeeper	Description	Hours	Rate
		agenda (0.3). Correspond with co-counsel regarding agenda and status conference (0.2). T/C with Mr. Stein regarding planning/coordination regarding agenda and status conference (0.5). File agenda with edits and email Court per Pretrial Order No. 2 (0.2).		
12/31/15	MHT	Review/evaluate issues for call on 1/4/16 with Honda's counsel before status conference with Court.	0.40 hrs	170.00
01/02/16	GMT	Conference with Mark Troutman re upcoming phone status conference with Court.	0.20 hrs	99.00
01/03/16	MHT	Review/planning/coordination for call with Honda's counsel, timekeeping and expense protocol, and proposed protective order.	0.20 hrs	85.00
01/04/16	MHT	Reviewed SD Ohio Rules regarding filing under seal to advise Lead Counsel (0.3). Edited draft protective order (1.5) and reviewed edits to timekeeping protocol (0.3). Correspond with Lead Counsel regarding protective order, timekeeping protocol, and calls with Honda's counsel and the Court (0.2). Call with Mike McMorrow regarding CAC (0.2). Call with Honda's counsel regarding discovery (0.3). Attended status conference via telephone with Judge (0.3). T/C with Lead Counsel regarding pretrial issues (0.4).	3.50 hrs	1,487.50
01/04/16	GMT	Conference with Mark Troutman re fee protocol and agenda for status conference (0.4); e-mail to Eric Gibbs regarding fee protocol and agenda (0.1); conference with Mark Troutman re Ohio plaintiff (0.3); phone conference with opposing counsel regarding discovery (0.3); conference with Mark Troutman regarding future pleadings (0.7).	1.80 hrs	891.00
01/05/16	MHT	F/U email to Honda's counsel regarding changes in Local Rules regarding sealing documents (0.2). Drafted proposed update to co-counsel regarding call with Court (0.2). Reviewed additional background regarding MJ Deavers' jurisprudence (0.5).	0.90 hrs	382.50
01/06/16	MHT	Reviewed/edit/drafted email to all counsel with report form status conference, request for assistance with CAC, and timekeeping protocol.	0.90 hrs	382.50
01/07/16	MHT	Reviewed issues with Ohio Plaintiff Maticcik	0.50 hrs	212.50



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		and other potential Plaintiffs for CAC (0.3). Reviewed Court's Pretrial Order No. 4 (0.2).	
01/07/16	GMT	Conference with Mark Troutman re getting client information.	0.20 hrs 99.00
01/08/16	MHT	Review/plan/correspond with co-counsel regarding additional Plaintiffs for CAC.	0.30 hrs 127.50
01/11/16	MHT	Prep/email with all counsel regarding call with OH Plaintiff Maticcik (0.2). Assessed status of other Plaintiffs forwarded by Mr. McMorrow (0.3).	0.50 hrs 212.50
01/12/16	MHT	Review/evaluate issues with class reps (0.2). Review/assess local rules to advise lead counsel regarding Amended Complaint (0.2).	0.40 hrs 170.00
01/13/16	MHT	Prep / t/c with co-counsel and Ohio Plaintiff Jon Maticcik regarding initial intro and interview (0.6). F/U email with Mr. Stein and Mr. Gibbs regarding additional repairs sought by Mr. Maticcik at his local dealership (0.2). Initial review/comment regarding draft CAC (1.6). Reviewed strategy issues and notice issues for CAC (0.3).	2.70 hrs 1,147.50
01/13/16	GMT	Call with client Maticsek and co-counsel (0.6); review and edits of e-mail to co-counsel; review and edits to draft CAC (2.0); e-mail to co-counsel re CAC (0.2); e-mails to co-counsel re UDAP, fraud by omission and warranty claims (0.2).	3.00 hrs 1,485.00
01/14/16	MHT	Reviewed issues/questions raised by Mr. Stein regarding CAC and pleading (0.2). Research/draft fraud by omission section of CAC (0.9). Reviewed/email with potential MI Plaintiff Tom Prychitko regarding claims (0.2). Coordination regarding new Plaintiffs with Mr. Stein and Mr. Gibbs (0.3). Reviewed issues regarding claims in CAC (0.2).	1.80 hrs 765.00
01/14/16	GMT	E-mail to co-counsel re Ohio law for CAC.	0.20 hrs 99.00
01/15/16	MHT	Reviewed draft facts section of CAC for Ohio Plaintiff Maticcik (0.5). Reviewed Honda's edits to proposed tolling agreement (0.3). Research/draft fraud by omission and unjust enrichment claims for CAC (2.4). Prep / t/c with Mr. Prychitko regarding background and facts for Complaint (0.3). Drafted retainer agreement for Mr. Prychitko (0.2). Email with	4.90 hrs 2,082.50

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		Mr. Prychitko regarding involvement in case (0.2). Additional research regarding reliance issues with fraud by omission claim (0.7). Reviewed Honda's emails regarding tolling agreement and other discovery-related items (0.2). Correspond with Mr. Stein regarding CAC review (0.1).		
01/15/16	GMT	Review and edits to draft Complaint.	1.40 hrs	693.00
01/16/16	GMT	Review and edits to demand letter and e-mail to co-counsel.	0.30 hrs	148.50
01/17/16	MHT	Correspond with Plaintiff Tom Prychitko regarding CAC edited facts and CA allegations in CAC (0.3). Correspond with co-counsel regarding CAC (0.2). Reviewed docs forwarded by MI Plaintiff (1.6).	2.10 hrs	892.50
01/18/16	MHT	Review/edits to demand letter for statutory and UCC notice (0.2). Evaluate further work for CAC and coordination with co-counsel (0.6). Correspond and handled issues with facts and retainer letter with MI Plaintiff (0.3). F/U call with MI Plaintiff regarding retainer letter (0.2). Review/circulate CAC to all counsel for final review (0.2). Review/assess comments from co-counsel in executive committee roles (0.2). Reviewed Defendant's edits to tolling agreement (0.3). Reviewed CAC edits from co-counsel (0.3)	2.30 hrs	977.50
01/19/16	MHT	Reviewed/finalized/filed Joint Stip for Tolling Agreement (0.3). Emailed Court regarding proposed Stipulation on Tolling Agreement (0.2). Reviewed CAC per request from Mr. Stein regarding SD Ohio format issues (0.6). Reviewed issues with implied warranty in tort claim from Ohio in CAC (0.7). Final edits/filing of CAC (0.7). Drafted/edited preservation letter for MI Plaintiff Prychitko, then forwarded it to him (0.4).	2.90 hrs	1,232.50
01/19/16	GMT	Review of draft Complaint and telephone conference with Mark Troutman.	0.20 hrs	99.00
01/20/16	MHT	Reviewed Local Rules and advice regarding procedural issues at onset of case (0.3) Reviewed Plaintiffs to evaluate early procedural/discovery issues for pretrial (0.2).	0.50 hrs	212.50
01/21/16	MHT	Reviewed/strategized regarding issues for	0.20 hrs	85.00

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		meet-and-confer regarding Complaint, including email with Mr. Stein.	
01/22/16	MHT	Reviewed issues with final version of CAC to plan regarding 1/26/16 meet-and-confer with Honda's counsel.	0.30 hrs 127.50
01/25/16	MHT	Review/analysis issues to facilitate discussion at meet-and-confer on 1/26/16 (0.2). Correspondence with Mr. Stein and Mr. Gibbs regarding joint agenda and conference attendees due on 1/28/16 (0.2).	0.40 hrs 170.00
01/25/16	MHT	Evaluation of case, claims, and strategy then t/c to convey to Mr. Matusik (0.2). T/C with Mr. Matusik to confirm plan/direction (0.2).	0.40 hrs 170.00
01/26/16	MHT	Continued review/prep for meet-and-confer with Honda (0.9). T/C with Honda's counsel regarding review and planning regarding Consolidated Amended Complaint and litigation going forward (0.7).	1.60 hrs 680.00
01/26/16	GMT	Phone conference with co-counsel and opposing counsel regarding CAC.	1.00 hrs 495.00
01/27/16	MHT	Review/evaluate Honda's comments on protective order (0.4). Prep / t/c with Mr. Stein regarding Honda's requests per meet-and-confer on CAC (0.6). Reviewed ND Ohio ESI Order for potential model here per Mr. Stein's request (0.4). Drafted redline to Honda's edits to protective order (1.3).	2.70 hrs 1,147.50
01/27/16	GMT	Review of Honda's comments on draft protective order (0.9); phone conference with co-counsel regarding protective order (0.6).	1.50 hrs 742.50
01/28/16	MHT	Review/edited draft agenda per Mr. Stein (0.4). Reviewed edits to draft protective order per Mr. Stein's comments to get back to Honda (0.5). Researched regarding issues for protective order (0.4). Reviewed Honda's edits to Joint Agenda for 2/1/16 status conference (0.3). T/C with Mr. Stein regarding Joint Agenda and prep (0.2). Correspond with Honda's counsel and file Joint Agenda (0.2).	2.00 hrs 850.00
01/28/16	GMT	Review and edits to protective order draft (0.2); review and edits to draft agenda (0.2); conference with Mark Troutman re draft agenda (0.2).	0.60 hrs 297.00
02/01/16	MHT	Review/prep/respond with Honda's counsel	0.80 hrs 340.00

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regarding continued negotiations on Stipulated Protective Order (0.4). Prep / t/c with Court for its regular status conference via telephone (0.4).

02/02/16	MHT	Prep/review/call with Ms. Kiser regarding negotiations on protective order (0.5). Prep / t/c with Honda's counsel regarding Rule 26 discovery conference (0.8). T/C with Mr. Stein regarding Rule 26(f) report and negotiations over protective order (0.3). Marked and f/u email with further edits to proposed protective order (0.6). Reviewed/edited Mr. Stein's draft scheduling order (0.7). Reviewed Defendant's changes to scheduling order (0.3).	3.20 hrs	1,360.00
02/03/16	MHT	Reviewed/managed ongoing assignments in case (0.2). Review/direction to Ms. Long regarding fee and expense reporting per case protocol (0.1). Reviewed bill per timekeeping protocol with attention to common benefit time (0.2). Reviewed outstanding issues on protective order negotiations (0.3). Reviewed issues for f/u on R. 26(f) report (0.1). Handled class member inquires regarding repairs (0.2).	1.10 hrs	467.50
02/04/16	MHT	Reviewed Court's Pretrial Order No. 4 (0.2). F/u with Ms. Kiser regarding edits to protective order (0.1). Review/prep for call with interested class member from CA (0.2). T/C with potential class member Mr. Hazelrigg regarding issues with friend's CR-V (0.2). Review/analysis/comments on Honda's edits to stipulated protective order (0.3). Reviewed issues form R. 26(f) conference for comment to Mr. Stein (0.3). Finalized/filed stipulated protective order with Court (0.2). Review/comment on draft R. 26(f) report (0.2).	1.70 hrs	722.50
02/05/16	MHT	Call from and f/u with email to MI Plaintiff's concerns regarding interaction with dealer regarding repairs (0.2). F/U regarding above with Mr. Stein (0.1). Correspond with co-counsel regarding inspection issues (0.1).	0.40 hrs	170.00
02/07/16	MHT	Reviewed Ms. Kiser's email regarding discrepancy or docs provided with initial disclosures and compared to notes from call.	0.10 hrs	42.50
02/08/16	MHT	Correspond/prep with co-counsel regarding call with Ohio Plaintiff regarding preservation	1.30 hrs	552.50

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duties and inspection (0.2). T/C with Ohio Plaintiff John Maticcik regarding preservation obligations (0.2). Review/analysis/direction regarding billing reports for co-lead (0.1). Reviewed Honda's position regarding issues for R. 26(f) report (0.3). Plan/review regarding fraud by omission research (0.5).

02/08/16	GMT	Review of time submission.	0.40 hrs	198.00
02/09/16	MHT	Review/outline issues for fraud by omission claim(s) for 2nd Amended Complaint (0.2). F/u with MI Plaintiff regarding call and initial preservation issues (0.3). Began research of fraud by omission issues per Mr. Stein's direction (0.2).	0.70 hrs	297.50
02/09/16	GMT	Research into reliance for fraud by omission (0.2); conference with Mark Troutman re fraud by omission and class certification (0.2).	0.40 hrs	198.00
02/10/16	BL	Start coding and breakdown of invoice for submission.	0.50 hrs	67.50
02/11/16	BL	Continued work on coding invoice project.	0.50 hrs	67.50
02/12/16	MHT	Correspond with David Stein regarding OH Plaintiff's transmission repair issues (0.2). Reviewed expense/billing with paralegal to provide direction regarding reports (0.3). Correspond with Honda regarding OH Plaintiff's interest in getting transmission repairs (0.2). T/C with MI Plaintiff regarding document preservation and collection (0.2). Correspond with and review of OH Plaintiff's documents (0.4).	1.30 hrs	552.50
02/12/16	BL	Continued work on billing project.	2.50 hrs	337.50
02/15/16	MHT	Begin research/evaluation of fraud by omission claims requested by Mr. Stein with attention to nationwide class cert potential, state-by-state claims (3.4). Review/evaluate compilation of time and expenses per protocol (0.3). Correspond with Ms. Kiser regarding attendance at repairs on Mr. Maticcik's vehicle (0.2).	3.90 hrs	1,657.50
02/15/16	BL	Finalize numbers for billing project.	0.50 hrs	67.50
02/16/16	MHT	Continued research/evaluation of potential for nationwide fraud by omission class (2.8). F/u with all Plaintiffs' counsel regarding fee and	4.50 hrs	1,912.50

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expense submissions per protocol (0.2).  
 Drafted/edited/forwarded memo to Mr. Stein regarding fraud by omission research (0.8).  
 Reviewed emails from Ms. Kiser regarding Rule 26(f) report, ESI protocol, Maticcik transmission repair, and Rule 26 conference (0.4).  
 Managed Plaintiffs' time submissions per co-lead direction (0.3).

02/17/16	MHT	Reviewed/forwarded other Plaintiffs' time reports to Mr. Stein.	0.20 hrs	85.00
02/17/16	MHT	Reviewed/corresponded with MI Plaintiff regarding documents for initial disclosures.	0.20 hrs	85.00
02/19/16	MHT	Review/forwarded R. 26(f) report edits to Ms. Kiser (0.2). Reviewed Ms. Kiser's comments regarding initial disclosures (0.1).	0.30 hrs	127.50
02/22/16	MHT	Review/respond with Mr. Stein regarding Rule 26 initial disclosures (0.2). Reviewed emails regarding scope of initial documents disclosures (0.1). Reviewed/edited stip of dismissal for Honda Motor Company per tolling agreement (0.2). Reviewed AHM's initial disclosures (0.2). F/u with Mr. Maticcik regarding transmission repairs (0.1).	0.80 hrs	340.00
02/23/16	MHT	Reviewed documents provided by Honda's counsel with initial disclosures (0.2). Reviewed Mr. Stein's edits and proposed email regarding ESI protocol (0.3). Reviewed/downloaded video files produced by Honda with initial disclosures (0.3).	0.80 hrs	340.00
02/24/16	MHT	Review/analysis for 2/26/16 agenda and R. 26(f) report (0.2). F/u email with Honda's counsel regarding R. 26(f) report (0.1). Reviewed Honda's edits to Rule 26(f) report (0.1). Prep / t/c with Honda's counsel regarding continued meet-and-confer regarding CAC (0.5). Additional review/comment to R. 26(f) report (0.2). T/C with Court and email to partner regarding R. 26(f) report (0.2).	1.30 hrs	552.50
02/25/16	MHT	F/u with Mr. Maticcik regarding coordination of transmission repairs (0.2). Email with co-counsel and Honda's counsel regarding Mr. Maticcik's transmission issues (0.1). Review/respond with Mr. Stein regarding proposed agenda and attendees for 3/1/16 status conference (0.2). Reviewed issues with fraud	0.80 hrs	340.00

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		by omission claims (0.3).	
02/26/16	MHT	Continued review/consideration of research regarding reliance requirement for state-by-state fraud by omission claims (3.1). Emailed Honda's counsel regarding attendees for next telephone status conference (0.1). Research/evaluate states in which to allege fraud by omission (0.8). Emailed Court regarding status conference attendees (0.1). Final edits/filing of joint agenda and Rule 26(f) report (0.3).	4.40 hrs 1,870.00
02/28/16	MHT	Continued research regarding individual states' fraud by omission claims per Mr. Stein's assignment.	1.00 hrs 425.00
02/29/16	MHT	Continued research/evaluation of potential issues with fraud by omission claims on state-by-state basis per conversation with Mr. Stein (1.8). Correspond with Plaintiff Maticcik regarding transmission issues (0.2).	2.00 hrs 850.00
03/01/16	MHT	Correspond and t/c with Ms. Kiser regarding issues with Mr. Maticcik's repairs and prep for potential issues (0.2). Correspond with all Plaintiffs' counsel regarding edits to proposed draft 2nd CAC (0.2). Reviewed/edited draft 2nd CAC (0.9).	1.30 hrs 552.50
03/02/16	MHT	Attended telephone status conference with MJ Deavers (0.2). Reviewed/edited 2nd CAC (1.1).	1.30 hrs 552.50
03/03/16	MHT	Travel and attendance at OH Plaintiff Maticcik vehicle repairs (2.4). Additional review edits to 2nd CAC (3.0). Review/correspond with Mr. Maticcik regarding transmission repair and records (0.2).	5.60 hrs 2,380.00
03/04/16	MHT	Review/forwarded Honda's initial disclosure docs to Ms. Corbitt (0.2). Reviewed Case Management Order No. 4 and Pretrial Order No. 5 regarding 3/2/16 status conference (0.2).	0.40 hrs 170.00
03/07/16	MHT	Review/correspond with Plaintiff Maticcik regarding rear differential repairs.	0.20 hrs 85.00
03/08/16	GMT	Review of draft letter to Honda and e-discovery protocol.	0.30 hrs 148.50
03/08/16	GMT	Phone conference with opposing counsel regarding meet and confer regarding CAC.	0.40 hrs 198.00



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03/10/16	MHT	Reviewed Honda's redline of proposed doc production and ESI protocol.	0.30 hrs 127.50
03/14/16	MHT	Correspond/plan with Mr. Stein regarding discovery issues in case with review of Honda's position on databases (0.2). Reviewed/edited Plaintiffs' First Set of Interrogatories (0.4).	0.60 hrs 255.00
03/15/16	MHT	Review/assess Honda's further edits to ESI protocol and issues with call regarding discovery (0.7). Prep / t/c with Honda's counsel regarding discovery and related issues with Rule 26 obligations (0.7). Dealt with timekeeping and expense protocol with co-Plaintiffs' counsel (0.2).	1.60 hrs 680.00
03/15/16	GMT	Review of Strama case (0.2); e-mail to co-counsel regarding Strama case (0.2).	0.40 hrs 198.00
03/16/16	MHT	Review/assess/email Ms. Stein regarding reaction to call with Honda on 3/15/16 (0.3). Call with Honda's counsel regarding f/u from call with Honda and ongoing discovery (0.4). Reviewed Mr. Stein's draft email to Honda's counsel regarding standing issue (0.2). Reviewed Honda's response regarding interrogatories and R. 26 disclosures (0.2).	1.10 hrs 467.50
03/18/16	MHT	Reviewed Honda's additional edits and negotiations regarding document production protocol, including f/u email to Mr. Stein.	0.20 hrs 85.00
03/21/16	MHT	Review / f/u regarding issues with Honda's negotiations with doc production protocol.	0.10 hrs 42.50
03/22/16	MHT	Update with Plaintiffs' counsel regarding status of outstanding issues.	0.20 hrs 85.00
03/23/16	MHT	Reviewed Ms. Kiser's continued opposition to issues with ESI production protocol. (0.1) Overview of documents provided to Honda for Plaintiffs' initial disclosures per cover letter (0.1).	0.20 hrs 85.00
04/04/16	MHT	Case management and reviewed issues for agenda (0.3). Reviewed issues with new case filed in NY (0.2).	0.50 hrs 212.50
04/05/16	MHT	Begin download/review of Plaintiffs' initial disclosures (0.9). Reviewed notes and case management issues to prep for call with Mr. Stein (0.2). T/C with Mr. Stein to coordinate management issues (0.3). Drafted email to Honda's counsel re efforts to resolve	2.90 hrs 1,232.50



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		outstanding issues with ESI/Production Protocol (0.2). Finalized doc production/ESI protocol (0.5). Reviewed draft agenda for Judge Watson for status conference (0.3). Correspond with Honda's counsel re discovery and doc production (0.2). Finalized/filed ESI Production Protocol. (0.3)		
04/06/16	MHT	Continued download/brief overview re Plaintiffs' docs turned over with initial disclosures (1.2) Reviewed issues with vehicle inspections (0.3). Reviewed issues with agenda and service of discovery (0.3). Emailed Court re attendees for status conference on 4/8/16 (0.1). Continued edits and negotiations over agenda language (0.2).	2.10 hrs	892.50
04/06/16	BL	Begin spreadsheet for two-month billing report.	0.50 hrs	67.50
04/06/16	GMT	Conference with Mark Troutman re vehicle inspection and ESI protocol.	0.30 hrs	148.50
04/07/16	MHT	Downloaded/reviewed Honda's initial disclosure document production (2.6). Consideration of effect of documents on claims and potential negotiations (0.4). Reviewed paralegal's work on expense and fee reports (0.3).	3.30 hrs	1,402.50
04/07/16	BL	Finish billing report; meeting with M. Troutman regarding same and pre-bill.	0.50 hrs	67.50
04/07/16	GMT	Conference with Mark Troutman re document production.	0.20 hrs	99.00
04/08/16	MHT	Reviewed additional issues for prep for status conference (0.1). Attend telephone status conference with Court (0.4). F/u call from Mr. Stein re status conference call and documents produced by Honda (0.3). F/u email to Honda's counsel re discovery production and vehicle inspection timeline (0.2).	1.00 hrs	425.00
04/11/16	MHT	Continued review/analysis of initial disclosure doc production from Honda (0.2). Review/evaluate Honda's letter claiming lack of standing and enforcement of arbitration clause (0.3). Reviewed clients' documents for arbitration clause (0.2).	0.70 hrs	297.50
04/11/16	GMT	Review of letter from opposing counsel regarding standing.	0.20 hrs	99.00
04/12/16	MHT	Reviewed and analyzed source of Honda's	1.00 hrs	425.00

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					claims of lack of standing and enforcement of arbitration clauses.
04/12/16	GMT	Review of Honda counsel letter regarding arbitration clause.	0.20 hrs		99.00
04/13/16	MHT	Reviewed f/u letter from Ms. Kiser re issues with Plaintiffs' doc production and VINs (0.3). Evaluate/plan/respond Mr. Stein re AHM's arguments re standing and arbitration clause enforcement (0.5).	0.80 hrs		340.00
04/14/16	MHT	Begin research/review of AHM's arbitration clause arguments. Reviewed/finalized/forwarded time reports to Mr. Stein.	2.40 hrs		1,020.00
04/14/16	GMT	Assess and review of arbitration clause.	0.30 hrs		148.50
04/15/16	MHT	Continued research/evaluation/memo re Honda's demands for arbitration (2.9). Reviewed issues with discovery per emails from Ms. Kiser (0.3). Reviewed time reports from Plaintiffs' counsel per protocol (.04).	3.60 hrs		1,530.00
04/15/16	GMT	Email to co-counsel re M/M and arbitration.	0.20 hrs		99.00
04/17/16	MHT	Drafted letter to Ms. Kiser responding re standing and arbitration clause arguments.	0.30 hrs		127.50
04/18/16	MHT	Reviewed research re M/M obstacle to arbitration clause enforcement. Revised/finalized response to Honda re standing and arbitration clause issues.	1.80 hrs		765.00
04/19/16	MHT	Initial receipt and review of Honda's MTD with exhibits (1.8). Reviewed Honda's supplemental doc production (0.8). Reviewed letter from Ms. Kiser re Plaintiffs' facts and background (0.2).	2.80 hrs		1,190.00
04/19/16	GMT	Review/assess arbitration provision.	0.10 hrs		49.50
04/21/16	MHT	Reviewed/edited letter to Honda re Plaintiff Inamov's ownership of CR-V (0.1). Correspondence with co-counsel re 12(b)(6) motion issues (0.1).	0.20 hrs		85.00
04/22/16	MHT	Additional review/comment on R. 12(b)(6) motion (0.5). Additional research/evaluation re arbitration clause with SD Ohio authority (0.3).	0.80 hrs		340.00
04/26/16	MHT	Review/analysis of handling of Rule 12(b)(6) motion opposition (0.2). Reviewed Honda's forwarding of Plaintiff Hsi's purchase	0.40 hrs		170.00

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		documents and effect on arbitration clause (0.2).	
04/27/16	MHT	Additional prep/review of Honda's 12(b)(6) motion for call with Mr. Stein (0.9). T/c with Mr. Stein re Rule 12(b)(6) response and other case issues (0.5). Begin overview of issues with fact and judicial notice sections (0.8). Reviewed and provided comment re draft agenda and discovery letter issues (0.3).	2.50 hrs 1,062.50
04/28/16	MHT	F/U review of Honda's documents provided so far to evaluate additional ones needed (0.2). Reviewed/negotiated/finalized/field joint agenda for status conference on 5/2/16 per Order (0.6).	0.80 hrs 340.00
05/01/16	GMT	Planing and phone conference with co-counsel regarding agenda and discovery.	0.60 hrs 297.00
05/02/16	MHT	Prep/review for status conference with Judge (0.3). Reviewed notes re inspection protocol appropriate for case (0.6).	0.90 hrs 382.50
05/03/16	MHT	Reviewed outstanding discovery issues (0.2). Emailed Mr. Stein re conference yesterday with Court and discovery-related issues (0.1). Reviewed case management and Pretrial Order NO. 7 (0.1). F/u with Mr. Williams re service as expert for inspections (0.1). Correspond with Bill Williams re assistance with inspections (0.1).	0.60 hrs 255.00
05/04/16	MHT	Review/prep for meet-and-confer with Honda over 1st set of ROGS (0.3). T/C with Mr. Kiser to meet-and-confer over 1st set of ROGS (0.4). F/u call with Mr. Stein re result of meet-and-confer (0.2). Reviewed discovery from Honda re fact issues for MTD opposition (0.4). Correspond with putative CT class member re repairs not working as well as co-leads re value in her story (0.2).	1.50 hrs 637.50
05/06/16	MHT	Prep/initial call with expert Bill Williams re case background (0.6). Initial receipt and review of AHM's Responses to 1st ROGS (0.4).	1.00 hrs 425.00
05/10/16	MHT	Begin review/evaluation (including research) of Honda's seeking judicial notice in R. 12(b)(6) motion for attachments (1.2). Correspond with Mr. Stein re meet-and-confer with Honda re 1st set of ROGS (0.2). T/C with Mr. Stein re potential Plaintiff from CT (0.2).	1.90 hrs 807.50

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		Reviewed/outlined approach for discovery dispute over 1st set of ROGS (0.3).	
05/11/16	MHT	Additional review of Honda's initial disclosures to prep for conference with expert Bill Williams (.06). T/C with expert Bill Williams re his review of initial disclosure documents (0.7).	1.30 hrs 552.50
05/16/16	MHT	Reviewed research re standing and judicial notice for MTD response.	0.40 hrs 170.00
05/16/16	SKJ	Reviewed second consolidated amended complaint and motion to dismiss (1.3). Researched issues of judicial notice, attachments to motion to dismiss, and effect of pleading assertion versus attachment indication (0.5). Drafted strategy memorandum re: identified issues for memorandum in opposition (0.5).	2.30 hrs 920.00
05/17/16	MHT	Reviewed Ms. Kiser's email f/u re requests for further documentation re defect, as well as review of docs cited in her email (0.2). Reviewed issues for facts in MTD response (0.6).	0.80 hrs 340.00
05/17/16	GMT	Conference and direction with Mark Troutman and Shawn Judge re case strategy.	0.40 hrs 198.00
05/18/16	MHT	Review/edit memo to Mr. Stein re judicial notice re exhibits to MTD.	0.30 hrs 127.50
05/18/16	GMT	Review of judicial notice memo.	0.20 hrs 99.00
05/18/16	SKJ	Reviewed Rule 12(b)(1) motion to dismiss and associated judicial notice/attachment research (0.5). Drafted judicial notice strategy memorandum (0.7).	1.20 hrs 480.00
05/18/16	SKJ	Completed drafting of judicial notice strategy memorandum (0.4). Edited and sent memorandum to Messrs. Greg Travalio and Mark Troutman (0.2).	0.60 hrs 240.00
05/19/16	SKJ	Drafted and edited background section for memorandum in opposition to motion to dismiss.	3.10 hrs 1,240.00
05/19/16	SKJ	Reviewed motion to dismiss and second consolidated amended complaint for memorandum in opposition background section.	0.20 hrs 80.00
05/20/16	MHT	Review/comment on draft response to Honda's	2.00 hrs 850.00

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		supplemental doc production (0.4). Reviewed outstanding issues with ROGs to parties (0.3). F/U email with CT Plaintiff re status of case and her claims (0.2). Reviewed/edited draft facts section for memo in opp MTD (1.1).	
05/20/16	SKJ	Edited facts/background section for memorandum in opposition to Rule 12(b)(1) and (6) motion to dismiss.	0.60 hrs 240.00
05/20/16	SKJ	Evaluated background section for memorandum in opposition, discussed strategy, and drafted revisions with Mr. Mark Troutman.	0.30 hrs 120.00
05/22/16	MHT	Additional review/edits re facts for MTD response.	0.30 hrs 127.50
05/22/16	GMT	Review of draft Facts section to 12(b)(6) response.	0.50 hrs 247.50
05/22/16	SKJ	Reviewed email correspondence and suggested edits from Mr. Greg Travalio on background section for memorandum in opposition.	0.20 hrs 80.00
05/23/16	MHT	Reviewed 2nd CAC re additional facts for MTD Response (0.7). Reviewed issues re dispute over Honda's responses to 1st ROGs (0.2). T/C with Mr. Stein re issues with opposition to MTD, including additional assignment (0.3). Email all counsel re moving status conference (0.2).	1.40 hrs 595.00
05/23/16	GMT	Conference with Mark Troutman and Shawn Judge re ideas with response to 12(b)(6) motion.	0.20 hrs 99.00
05/23/16	SKJ	Met with Messrs. Greg Travalio and Mark Troutman re: draft background section for memorandum in opposition to Honda's Rule 12(b)(1) and (6) motion, and revised draft.	0.70 hrs 280.00
05/23/16	SKJ	Strategy conference with Mr. Mark Troutman re: adequacy of video notice and publication/circulation of service bulletins.	0.30 hrs 120.00
05/25/16	MHT	Review/assess arguments re notice provided by You Tube video.	0.40 hrs 170.00
05/25/16	SKJ	Conducted research on online postings and technical service bulletins for memorandum on notice argument in motion to dismiss (1.1). Concluded drafting memorandum and sent to Messrs. Greg Travalio and Mark Troutman (0.7).	1.80 hrs 720.00

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05/25/16	SKJ	Conducted research on online postings and technical service bulletins for notice issue in motion to dismiss (1.1). Began drafting strategy memorandum (0.4).	1.50 hrs 600.00
05/25/16	SKJ	Reviewed Honda YouTube videos and conducted research re: motion to dismiss issue of notice for fraud by omission claims.	0.90 hrs 360.00
05/25/16	SKJ	Reviewed motion to dismiss for notice arguments re: YouTube videos and technical service bulletins.	0.20 hrs 80.00
05/26/16	MHT	Reviewed draft argument re Honda's reliance on You Tube videos and TSBs for notice (0.6). Reviewed authority re notice provided in non-safety defect cases (0.7). Reviewed SD Ohio authority to support positions in discovery dispute with Honda over 1st ROGs(0.5).	1.80 hrs 765.00
05/26/16	SKJ	Concluded conversion of notice memorandum into argument for memorandum in opposition to motion to dismiss (0.1). Edited draft argument (0.3).	0.40 hrs 160.00
05/26/16	SKJ	Converted online posting/technical service bulletin memorandum into draft argument for memorandum in opposition to motion to dismiss.	0.70 hrs 280.00
05/26/16	SKJ	Reviewed proposed revisions on draft notice argument for memorandum in opposition and made select changes. Reviewed motion to dismiss. Sent final version of draft argument to Messrs. Greg Travaglio and Mark Troutman.	0.50 hrs 200.00
05/26/16	SKJ	Reviewed correspondence re: meet and confer on outstanding discovery dispute and memorandum in opposition argument.	0.30 hrs 120.00
05/31/16	MHT	Correspond with Mr. Stein re agenda and status conference scheduled for 6/3/16 (0.2). Drafted joint agenda for parties' status conference with Judge (0.4). Reviewed Honda's letter re meet and confer efforts on 1st ROGs (0.2). Reviewed response from Ms. Kiser re additional documents to voluntarily produce (0.2). Review/forward edits to agenda to Ms. Kiser (0.2).	1.20 hrs 510.00
06/01/16	MHT	Reviewed MTD briefing to edit/comment on draft MTD opposition (1.9). Reviewed content from CA complainant re appropriate handling	4.40 hrs 1,870.00

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(0.3). F/U and edits to status conference agenda for Judge Watson (0.3). Research remedies re standing argument (0.8). Research/advise re filing under seal (0.2). Reviewed status conference report edits and filed with Court (0.2). Emailed conference attendees to Judge (0.1). Initial receipt and review of 1st set of ROGs and RFP from Honda to several Plaintiffs (0.6).

06/01/16	GMT	[5/26/16] Review of draft memo on You Tube video and edits to draft memo (0.3); review of draft letter on interrogatory responses (0.2).	0.50 hrs	247.50
06/01/16	SKJ	Reviewed process for filing memorandum in opposition and exhibit under seal, including communication with Magistrate Judge Deavers' chambers re: preferences.	0.20 hrs	80.00
06/01/16	SKJ	Strategy re: filing under seal and Honda's argument re: repairs requirement with Mr. Mark Troutman.	0.30 hrs	120.00
06/01/16	SKJ	Drafted motion for leave to file under seal and proposed order (0.5). Drafted cover email and sent to Messrs. Greg Travalio, Mark Troutman, David Stein, and Clay Stockton (0.2). Reviewed and evaluated multiple responses and sent multiple strategy recommendations (0.2).	0.90 hrs	360.00
06/01/16	SKJ	Reviewed draft memorandum in opposition to Honda's motion to dismiss and made suggested edits.	0.80 hrs	320.00
06/01/16	SKJ	Reviewed emails from Messrs. Greg Travalio, Mark Troutman, David Stein, and Clayton Stockton re: motion to dismiss memorandum in opposition.	0.20 hrs	80.00
06/02/16	MHT	Final read and filed motion for leave to seal exhibits to MTD opposition (1.9). T/C with Mr. Burton from Sidley re exceeding page limits on motion to compel arbitration (0.2). Email with Mr. Stein and Mr. Burton re motion for leave to exceed page limits (0.1). Reviewed issues to consider re vehicle inspections (0.3). Reviewed motion for leave to file in excess of page limits and motion to enforce arbitration (0.2).	2.70 hrs	1,147.50
06/02/16	GMT	Email to Mark Troutman regarding MTD opposition.	0.10 hrs	49.50



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06/02/16	SKJ	Reviewed second draft of memorandum in opposition to Honda's motion to dismiss and made suggested edits.	1.80	hrs	720.00
06/02/16	SKJ	Discussed proposed revisions for motion for leave to file under seal and inclusion of table of contents and table of authorities in memorandum in opposition with Mr. Mark Troutman.	0.30	hrs	120.00
06/02/16	SKJ	Discussed draft memorandum in opposition final edits with Mr. Mark Troutman. Reviewed emails from Messrs. Mark Troutman, David Stein, and Clayton Stock re: suggested edits.	0.40	hrs	160.00
06/02/16	SKJ	Reviewed Honda's proffered motion to compel arbitration and Mr. Mark Troutman's research and strategy memorandum re: arbitration clauses.	1.00	hrs	400.00
06/03/16	MHT	Review/prep/attend status conference with Judge Watson (0.5). Researched past writings to offer assistance on arbitration clause issues to Mr. Stein (2.2). Email with Mr. Stein re outstanding issues with Honda re meet-and-confer and discovery issues (0.3). Reviewed GMT's comments/analysis re motion to compel arbitration (0.4). Begin review/edits to inspection protocol (0.4).	3.80	hrs	1,615.00
06/03/16	GMT	Review of motion to arbitrate; comments on motion to arbitrate; email to Mark Troutman re motion.	1.30	hrs	643.50
06/03/16	SKJ	Evaluated Honda's grounds for compelling arbitration.	0.50	hrs	200.00
06/03/16	SKJ	Reviewed correspondence re: motion to compel arbitration arguments, protocol for vehicle inspections, and telephone conference agenda.	0.20	hrs	80.00
06/05/16	SKJ	Reviewed Mr. Greg Travaglio's analysis of Honda's motion to compel arbitration.	0.20	hrs	80.00
06/06/16	MHT	Prep for meet-and-confer today re 1st ROGs (0.8). T/C with putative class member re efforts to get repairs form Honda dealership (0.3). T/C with Honda's counsel to meet-and-confer re 1st set of ROGs to AMC/HMC (1.1).	2.20	hrs	935.00
06/06/16	BL	Bi-monthly reporting requirements.	0.50	hrs	67.50
06/07/16	MHT	Reviewed documents from Honda re	1.00	hrs	425.00



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		supplemental requests (0.3). Reviewed issues for R. 30(b)(6) depo (0.2). Reviewed items needed to attempt settlement talks (0.2). Reviewed Court's Pretrial Order No. 8 (0.2). Reviewed draft email to Ms. Kiser re f/u on meet-and-confer (0.1).		
06/07/16	BL	Finish required time and expense reporting.	0.50 hrs	67.50
06/08/16	MHT	Reviewed f/u email with Honda re voluntary disclosure of documents (0.1). Reviewed devices referred to in inspection protocol (0.2). Review/planning re inspection schedule (0.2).	0.50 hrs	212.50
06/08/16	GMT	Phone conference with Mark Troutman re update and advancing litigation..	0.30 hrs	148.50
06/09/16	MHT	Review/edit/comment re draft inspection protocol (0.2) Reviewed correspondence from Ms. Kiser re protocol re inspection and document production (0.1). Review/forward additional research or arbitration clause issues (0.5). Review/forward time and expense report to Mr. Stein per protocol (0.2).	1.00 hrs	425.00
06/09/16	SKJ	Reviewed case and assessed strategy re: arbitration clauses, meet and confer over discovery requests, and vehicle inspections.	0.20 hrs	80.00
06/13/16	MHT	Review/draft responses to supplemental discovery requests from Honda (0.4). Reviewed/edited R. 30(b)(6) notice and drafted additional document requests (0.6).	1.00 hrs	425.00
06/13/16	SKJ	Reviewed strategy correspondence on potential negotiation issues.	0.10 hrs	40.00
06/14/16	MHT	Review strategy re Rule 30(b)(6) notice and provide edits to Mr. Stein (0.7). T/C with Mr. Stein re issues with inspection protocol, as well as Rule 30(b)(6) depo notice (0.7). Review/prep/call with Honda re inspection protocol and scheduling issues for inspections (0.3).	1.70 hrs	722.50
06/14/16	SKJ	Reviewed draft 30(b)(6) language and corresponded with Mr. Mark Troutman re: revision.	0.10 hrs	40.00
06/14/16	SKJ	Reviewed correspondence re: additional 30(b)(6) deposition.	0.10 hrs	40.00
06/15/16	MHT	Further consideration of documents/data to receive from Honda's inspection, including	2.50 hrs	1,062.50

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		legal research (0.5). Review/research damages issues in case (1.5). Correspond and review discovery issues re depositions and inspections with Mr. Stein (0.3). Reviewed/forwarded time reports per protocol (0.2).	
06/15/16	GMT	Update conference with Mark Troutman and Shawn Judge.	0.10 hrs 49.50
06/15/16	SKJ	Case management conference and strategy discussion.	0.20 hrs 80.00
06/16/16	MHT	Reviewed issues with Defendant's initial written discovery to Plaintiffs re scope and privacy issues (0.3). Reviewed available docs for Plaintiffs Maticcik and Prychikyo for discovery (0.2).	0.50 hrs 212.50
06/17/16	MHT	Reviewed issues with inspection protocol and further doc production (0.2). Reviewed inspection notices (0.2). Reviewed issues with discovery responses and arbitration clause motion (0.4).	0.80 hrs 340.00
06/20/16	MHT	Review/email with all counsel re adjustments to deadlines given inspections and recent events in case (0.3). Drafted joint motion for extension of briefing deadlines (1.3). Reviewed issues with inspection protocol, including changes to last version before service from Honda (0.3). Assisted re dispute over AMC's inspection records (0.3).	2.20 hrs 935.00
06/20/16	MHT		0.00 hrs N/C
06/20/16	SKJ	Reviewed and edited joint motion for an extension of time and proposed order.	0.10 hrs 40.00
06/20/16	SKJ	Reviewed correspondence and made recommendation re: filing of joint motion for an extension of time and content of proposed order.	0.10 hrs 40.00
06/21/16	MHT	Reviewed Ms. Kiser's emails re inspection prep. Reviewed Honda's expert's background.	0.20 hrs 85.00
06/21/16	SKJ	Reviewed correspondence re: upcoming vehicle inspections.	0.10 hrs 40.00
06/22/16	MHT	Reviewed letter from Ms. Kiser re data from vehicle inspections. Correspond with Mr. Stein re discovery issues.	0.90 hrs 382.50
06/22/16	SKJ	Reviewed correspondence re: data from vehicle examination and joint motion for extensions of	0.10 hrs 40.00

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					time.
06/24/16	MHT	Call from Mr. Stein re report on inspection from 6/23/16 and planning re opposition to arbitration motion (0.3). Evaluation re use of inspection results with Judge (0.2). Reviewed Honda's objections to Rule 30(b)(6) notice (0.3).	0.80 hrs		340.00
06/24/16	SKJ	Strategized re: vehicle inspection results.	0.30 hrs		120.00
06/27/16	MHT	Correspond/coordinate re issues with Maticcik inspection.	0.30 hrs		127.50
06/27/16	GMT	Conference with Mark Troutman and Shawn Judge re recent developments in case and developments in case schedule.	0.20 hrs		99.00
06/27/16	SKJ	Reviewed file and strategized re: vehicle inspections.	0.20 hrs		80.00
06/29/16	MHT	Reviewed/planned re issues for 7/6/16 status conference. Drafted proposed joint agenda. Coordination and planning for status conference with Mr. Stein.	0.80 hrs		340.00
06/30/16	MHT	Reviewed status of outstanding discovery to reflect in status conference agenda (0.2). Revise/comment on edits to agenda (0.2). Forwarded timekeeping protocol to new counsel (0.2).	0.60 hrs		255.00
07/01/16	MHT	Review/edit status conference agenda and email Court re 7/6/16 status conference.	0.20 hrs		85.00
07/05/16	MHT	Reviewed discovery and other status issues for status conference on 7/6/16 with Judges.	0.20 hrs		85.00
07/06/16	MHT	Prep/review of outstanding discovery items (0.4). Attended telephone status conference with MJ Deavers (0.5). Review/evaluate Court's resolution of Plaintiffs' 30(b)(6) notice served on 6/15/16 (0.3).	1.20 hrs		510.00
07/06/16	SKJ	Review correspondence from Ms. Chelsey Vascura and Messrs. James Wilson and Mark Troutman re: telephone conference and proposed order for filing under seal.	0.20 hrs		80.00
07/06/16	SKJ	Participate in telephone conference with Magistrate Judge Deavers re: discovery and case management.	0.30 hrs		120.00
07/06/16	SKJ	Review docket and case management orders and draft, revise, and file notice of appearance.	0.50 hrs		200.00

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07/07/16	MHT	Review/analysis for opinion to Mr. Stein re enforceability of Rule 30(b)(6) notice (0.3). Review/analyze Honda's Reply for MTD with attention to potential motions to strike (0.8).	1.10	hrs	467.50
07/07/16	SKJ	Review objections to 30(b)(6) notice and provide evaluation to Mr. Mark Troutman.	0.10	hrs	40.00
07/07/16	SKJ	Review correspondence from Mr. Mark Troutman re: Rule 12 briefing.	0.10	hrs	40.00
07/08/16	MHT	Correspond w/ Mr. Stein re outstanding discovery and briefing issues in case. Review/evaluate potential surreply issues.	0.70	hrs	297.50
07/08/16	SKJ	Draft and send outline of strategy for addressing motion to dismiss reply memorandum issues and the filing of a sur-reply memorandum.	0.40	hrs	160.00
07/08/16	SKJ	Strategize with Mr. Mark Troutman re: motion to dismiss reply memorandum.	0.10	hrs	40.00
07/08/16	SKJ	Review motion to dismiss reply memorandum, review select portions of initial motion to dismiss, and draft and send strategy recommendation.	1.20	hrs	480.00
07/08/16	SKJ	Review correspondence from Mr. Mark Troutman and Mr. Davis Stein re: meet and confer requirements and Rule 12(b)(6) briefing issues.	0.10	hrs	40.00
07/13/16	MHT	Review/evaluate Plaintiff Cushing, Beaulieu, and Maticcik's responses to Honda RFIs and RFPs.	0.40	hrs	170.00
07/13/16	SKJ	Research and provide answer re: electronic signature versus wet signature on declarations filed in the Southern District of Ohio.	0.10	hrs	40.00
07/13/16	SKJ	Review correspondence from Ms. Liv Kiser and Messrs. Mark Troutman and David Stein re: 30(b)(6) witness and first set of interrogatories and document requests.	0.20	hrs	80.00
07/14/16	MHT	Email re scheduling of next status conference call (0.2). Prep and attend meet-and-confer re Rule 30(b)(6) notice (0.4). Edited draft opposition to AHM's motion to enforce arbitration clauses (1.6).	2.20	hrs	935.00
07/14/16	GMT	Review and comments to response to Honda's Motion to Arbitrate.	1.50	hrs	742.50

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07/14/16	SKJ	Draft cover email, review, and send additional authority to Mr. David Stein for draft memorandum in opposition to motion to compel arbitration.	0.50 hrs 200.00
07/14/16	SKJ	Review draft response memorandum to motion to compel arbitration and make suggested edits and incorporate suggested edits from Mr. Greg Travaglio and Mr. Mark Troutman.	2.00 hrs 800.00
07/14/16	SKJ	Speak with S.D. Ohio judicial clerk Ms. Chelsey Vascura re: new date for telephone status conference (0.1). Send email to co-counsel confirming new date of August 8, 2016 (0.1).	0.20 hrs 80.00
07/14/16	SKJ	Speak twice with S.D. Ohio judicial clerk Ms. Chelsey Vascura re: moving date of next telephone status conference (0.2). Exchange emails with co-counsel re: alternate dates (0.1). Speak with Ms. Vascura to suggest date change (0.1).	0.40 hrs 160.00
07/14/16	SKJ	Reviewed correspondence re: rescheduling of telephone conference and opposition brief to motion to compel arbitration from Messrs. Mark Troutman, David Stein, and Greg Travaglio.	0.80 hrs 320.00
07/15/16	MHT	Reviewed/edited updated draft of opposition to arbitration clause (0.5). T/C with Mr. Stein re document exchange issues with AHM (0.2). Final review/comments before filing (0.3). Reviewed issues with potential resolution discussions and evidence needed (0.2). Reviewed document production from Plaintiffs (0.3).	1.50 hrs 637.50
07/15/16	SKJ	Review drafts of response to motion to compel arbitration and draft and send co-counsel a proposed revised introduction.	1.90 hrs 760.00
07/15/16	SKJ	Review correspondence from Ms. Caroline Corbitt re: supplemental production of discovery.	0.10 hrs 40.00
07/15/16	SKJ	Review correspondence from Messrs. Mark Troutman, David Stein, and Greg Travaglio re: arbitration opposition briefing, proposed edits, and Judge Watson's Standing Order.	0.30 hrs 120.00
07/18/16	MHT	Review/plan re issues with Honda's voluntary production and began review of documents	1.40 hrs 595.00

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		produced to generate further questions (1.0). T/C with Mr. Stein re issues above (0.4).		
07/18/16	SKJ	Review correspondence from Mr. Mark Troutman, Mr. David Stein, Ms. Liv Kiser, and Mr. James Wilson re: Honda's reply memorandum extension request and production of supplemental discovery.	0.10 hrs	40.00
07/18/16	SKJ	Discuss strategy with Mr. Mark Troutman re: potential settlement discussions, 30(b)(6) deposition, modification of case deadlines, and timing of decisions on motion to compel arbitration and motion to dismiss.	0.30 hrs	120.00
07/18/16	SKJ	Conference call with Mr. Mark Troutman and Mr. David Stein re: strategy for modification of the case schedule and timing of potential settlement negotiations.	0.30 hrs	120.00
07/20/16	MHT	Reviewed notes and documents re additional supplementary doc requests from AHM.	0.40 hrs	170.00
07/20/16	GMT	Conference with Mark Troutman to update on developments and advance litigation.	0.20 hrs	99.00
07/22/16	MHT	Began review AHM's supplemental discovery responses and documents.	1.20 hrs	510.00
07/26/16	MHT	Continued with review/analysis of issues for mediation and settlement purposes.	0.40 hrs	170.00
07/28/16	MHT	Thorough review/evaluation of Honda's supplementary discovery responses and all documents to consider progress with discovery/mediation.	1.90 hrs	807.50
07/28/16	SKJ	Review correspondence from Messrs. Mark Troutman and David Stein re: Defendant's incomplete supplemental production, case schedule issues, and mediation.	0.20 hrs	80.00
07/29/16	SKJ	Review correspondence from Mr. Mark Troutman and Ms. Amy Zeman re: discovery issues.	0.10 hrs	40.00
08/02/16	MHT	Plan/draft status conference agenda for 8/8/16 status conference (0.5). Correspond with Mr. Stein re status conference agenda and other outstanding discovery issues (0.2). Reviewed draft letter re Honda's continued written discovery deficiencies (0.4).	1.10 hrs	467.50
08/02/16	SKJ	Review 10 emails re: meeting agenda and vehicle inspections from Ms. Caroline Corbitt,	0.30 hrs	120.00

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		Ms. Amy Zeman, Mr. Eric Gibbs, and Mr. Mark Troutman.	
08/03/16	MHT	Reviewed 7/22/16 doc production for questions for Ms. Kiser (0.9). Prep / t/c with Ms. Zeman re prep for call with Ms. Kiser re documents turned over so far (0.5). Reviewed/edited proposed joint agenda for Judge (0.3). Correspond with Ms. Kiser re status conference agenda (0.3).	2.00 hrs 850.00
08/03/16	SKJ	Review and edit proposed joint agenda communication to Court.	0.10 hrs 40.00
08/04/16	MHT	Continued review of discovery previously turned over by AHM re planning for today's call (1.5). Emailed Judges with status conference attendees for 8/11/16 (0.2). F/U with Ms. Zeman re prep for meet-and-confer re Plaintiffs' discovery responses (0.3). Final prep / t/c with Ms. Kiser re additional information re AMA's data production to date (0.4). Reviewed correspondence re supplemental information from AHM (0.3).	2.70 hrs 1,147.50
08/04/16	SKJ	Review 23 emails from co-counsel and opposing counsel re: discovery issues, end of August meeting, and telephone conference with the Court.	0.50 hrs 200.00
08/05/16	MHT	Correspond/coordinate with Amy Zeman re additional answers re docs from Ms. Kiser (0.2). Further review/planning re info needed for 8/31/16 meeting with AHM's lawyers (0.2). Reviewed list of abbreviations answered by AHM (0.2).	0.60 hrs 255.00
08/05/16	SKJ	Review email correspondence from Mr. Mark Troutman, Ms. Liv Kiser, and Ms. Amy Zeman re: discovery production, settlement meeting issues, and Ms. Angela Hill's vehicle/status.	0.30 hrs 120.00
08/08/16	MHT	Prep / t/c with Court for telephonic status conference.	0.30 hrs 127.50
08/08/16	GMT	Review of notes from status conference with Maribeth Deavers.	0.10 hrs 49.50
08/09/16	MHT	Reviewed Pretrial Order No. 10.	0.10 hrs 42.50
08/10/16	MHT	Reviewed/planned with Ms. Zeman re questions to Honda to prep for mediation (0.1). Reviewed Honda's responses to initial questions to prep for mediation (0.2).	0.30 hrs 127.50



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08/11/16	MHT	Continued review/analysis of AHM's responses to questions re documents (0.4). Direction and review re time report to lead counsel (0.2).	0.60	hrs	255.00
08/11/16	BL	Bi-monthly reporting for fees and expenses.	0.50	hrs	67.50
08/11/16	SKJ	Review emails from Ms. Amy Zeman and Ms. Liv Kiser re: outstanding discovery.	0.10	hrs	40.00
08/12/16	MHT	Continued prep/analysis re issues with AHM's responses to questions (0.3). Feedback to Ms. Zeman re AHM's response (0.1). Reviewed time and chart to report to lead counsel (0.1).	0.50	hrs	212.50
08/12/16	BL	Revisions to bi-monthly fee reporting.	0.50	hrs	67.50
08/14/16	SKJ	Review email from Ms. Amy Zeman to Ms. Liv Kiser re: discovery and settlement discussions.	0.10	hrs	40.00
08/15/16	MHT	Final review of time and expense for accuracy and appropriateness for forwarding to lead counsel (0.2). Drafted and forwarded update to Judges re settlement talks after conferring with Ms. Kiser (0.6). Review/forward time report from other counsel (0.3). Respond to Mr. Maticcik's interest in selling vehicle (0.3).	1.40	hrs	595.00
08/15/16	BL	Final revisions to budget reporting.	0.20	hrs	27.00
08/15/16	SKJ	Review emails from Ms. Liv Kiser, Ms. Amy Zeman, Mr. Eugene Turin, and Mr. Mark Troutman re: settlement discussion and the potential sale of client's vehicle.	0.40	hrs	160.00
08/16/16	MHT	Planning/review re expectations for LA meeting on 9/1/16 (0.2). Email with Ms. Zeman to plan for 9/1/16 meeting in LA (0.2). Email with Plaintiffs' counsel re Mr. Maticcik's ongoing complaints re vehicle and intent to sell (0.1).	0.50	hrs	212.50
08/16/16	SKJ	Review emails from Mr. Mark Troutman, Mr. David Stein, Ms. Amy Zeman, and Ms. Liv Kiser re: potential sale of client's vehicle, discovery, and settlement discussion dates.	0.30	hrs	120.00
08/17/16	SKJ	Review emails from Ms. Caroline Corbitt, Mr. Eugene Turin, and Mr. Mark Troutman re: client communication, sale of client's vehicle, and settlement.	0.30	hrs	120.00
08/18/16	SKJ	Review emails from Mr. Mark Troutman, Ms. Caroline Corbitt, and Mr. Eugene Turin re:	0.10	hrs	40.00



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		telephone conference and issue of Mr. John Maticcik's desire to sell car to avoid defect-related physical problems.	
08/19/16	MHT	Reviewed AHM's Reply in Support of its Motion to Enforce Arbitration Clause.	0.30 hrs 127.50
08/22/16	MHT	F/U with co-counsel re timekeeping and expense protocol.	0.10 hrs 42.50
08/22/16	SKJ	Review emails from Mr. David Stein, Mr. Mark Troutman, and Ms. Karla Gilbride re: case management.	0.40 hrs 160.00
08/25/16	MHT	Review/prep re issues for 9/1/16 mediation. Correspond with co-counsel re Ms. Kiser's inquiries re mediation.	0.40 hrs 170.00
08/25/16	SKJ	Review emails from Ms. Liv Kiser and Ms. Amy Zeman re: settlement discussions.	0.10 hrs 40.00
08/26/16	MHT	Prep/analysis for 9/1/16 meeting with Honda re preliminary settlement talks.	0.40 hrs 170.00
08/26/16	SKJ	Review emails re: settlement discussions from Ms. Amy Zeman, Ms. Liv Kiser, and Mr. Mark Troutman.	0.30 hrs 120.00
08/29/16	MHT	Prep/review data produced by Honda for meeting on 9/1/16, including docs already produced and questions poses to Honda.	2.20 hrs 935.00
08/29/16	SKJ	Assist with preparation for September 1, 2016 meeting with Honda (documents, strategy).	0.30 hrs 120.00
08/30/16	MHT	Review/assist Ms. Zeman with prep for 9/1/16 meeting with AHM.	0.60 hrs 255.00
08/30/16	SKJ	Review emails from Ms. Simone Jones and Ms. Amy Zeman re: outstanding discovery issues.	0.10 hrs 40.00
08/31/16	MHT	Coordinate and review items to take for 9/1/16 meeting in LA (1.2). Flights to LA for 9/1/16 meeting (10.1). Met w/ co-counsel for prep for meeting, including expert Bill Williams (1.5).	12.80 hrs 5,440.00
09/01/16	MHT	Met with Mr. Williams before meeting with AHM (1.3). Met with AHM's lawyers to begin mediation (5.4).	6.70 hrs 2,847.50
09/01/16	SKJ	Review email from Ms. Liv Kiser re: presentation.	0.10 hrs 40.00
09/01/16	SKJ	Exchange texts with Mr. Mark Troutman re: attorney's fees and upcoming telephone call with co-counsel.	0.10 hrs 40.00

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09/01/16	SKJ	Telephone call with Mr. Mark Troutman re: settlement meeting update and strategy for case schedule.	0.20 hrs 80.00
09/01/16	SKJ	Telephone call with Mr. Mark Troutman re: court preferences and settlement discussions.	0.10 hrs 40.00
09/02/16	MHT	Return travel from LA after meeting (7.4). Considered f/u questions for Honda after presentation (.06).	8.00 hrs 3,400.00
09/02/16	SKJ	Reviewed emails from Mr. Greg Travaglio and Mr. Mark Troutman re: Tuesday call with co-counsel.	0.20 hrs 80.00
09/06/16	MHT	Review/analyze proper questions for f/u with Honda's counsel after 9/1/16 meeting (0.5). Correspond with Mr. Maticcik re state of negotiations (0.2). Reviewed potential settlement options for next mediation (0.6). Drafted status conference agenda per Judge's Order (0.4). Reviewed Honda's 9/1/16 presentation re questions (1.5).	3.20 hrs 1,360.00
09/06/16	SKJ	Update and strategy conference with Mr. Greg Travaglio and Mr. Mark Troutman.	0.40 hrs 160.00
09/06/16	SKJ	Review and make suggested edits on update filing for the Court.	0.10 hrs 40.00
09/07/16	MHT	Reviewed further issues to help with meaningful negotiations.	0.90 hrs 382.50
09/08/16	MHT	Reviewed Honda's edits to status conference agenda (0.3). Further review of Honda's presentation to continue settlement discussions (0.8). Reviewed further edits to status report (0.3). T/C with Ms. Kiser re joint agenda and meet-and-confer re Maticcik vehicle (0.4). Finalized/filed joint agenda for 9/12/16 status conference (0.2). Reviewed f/u questions to Honda from 9/1/16 meeting (0.1).	2.10 hrs 892.50
09/09/16	MHT	Review/edit Honda's proposed stip re Maticcik's vehicle sale (0.2). Researched effect of vehicle sale on Maticcik's standing (1.2). Correspond with Ms. Zeman re prep for call with Honda re Maticcik vehicle sale (0.1). T/C with Ms. Kiser re call re Maticcik vehicle sale (0.3).	1.80 hrs 765.00
09/09/16	SKJ	Review Honda's response re: sale of named plaintiff/client's vehicle and discuss with Mr. Mark Troutman.	0.40 hrs 160.00

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09/12/16	MHT	Review/research issues re standing for status conference (0.7). Drafted and planned re disclosures re defect from Maticcik in vehicle sale (0.3). Reviewed further issues re attention to settlement negotiations (0.6).	1.60	hrs	680.00
09/12/16	GMT	Conference with Mark Troutman and Shawn Judge re Maticcik vehicle and damages theory (0.2); review of cost of repair (0.2); phone conference with Mark Troutman regarding settlement negotiations ((0.1); review of email to co-counsel. regarding damages theory (0.2)	0.70	hrs	346.50
09/12/16	SKJ	Update and strategy conference with Mr. Greg Travalio and Mr. Mark Troutman.	0.20	hrs	80.00
09/13/16	MHT	T/C with Ms. Zeman re progress with negotiations (0.2). Reviewed discovery re Plaintiffs' damage (0.2). Planning re potential mediation (0.3). Correspond with Ms. Zeman re Honda's concerns re Maticcik vehicle transfer (0.2).	0.90	hrs	382.50
09/13/16	GMT	Conference with Mark Troutman re status of settlement negotiations and update.	0.30	hrs	148.50
09/13/16	SKJ	Update and strategy conference with Mr. Greg Travalio and Mr. Mark Troutman.	0.30	hrs	120.00
09/13/16	SKJ	Review correspondence from Ms. Liv Kiser and Ms. Amy Zeman re: discovery.	0.30	hrs	120.00
09/15/16	MHT	Reviewed sales-related documents forwarded by Mr. Maticcik (0.2). Emailed Ms. Zeman re reaction of Honda re Maticcik document production (0.1).	0.30	hrs	127.50
09/15/16	SKJ	Review correspondence from Mr. Mark Troutman re: trade-in of Mr. Maticcik's vehicle.	0.10	hrs	40.00
09/16/16	MHT	Reviewed Plaintiff Maticcik's sale-related documents and related issues.	0.20	hrs	85.00
09/19/16	MHT	Planning/strategy re status of negotiations (0.1). F/U with Ms. Zeman re status of negotiation (0.1).	0.20	hrs	85.00
09/21/16	MHT	Reviewed subpoenas (one with error and one without error) to Byers re Maticcik vehicle.	0.30	hrs	127.50
09/26/16	MHT	Reviewed status of negotiations in regard to 10/12/16 status report date.	0.10	hrs	42.50
09/27/16	MHT	Evaluation/strategy re means to proceed with negotiations/discovery.	0.20	hrs	85.00

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09/29/16	MHT	Review/evaluation of discovery if case proceeds.	0.20	hrs	85.00
10/03/16	MHT	Reviewed deadlines and necessary adjustments (0.3). Reviewed / t/c with Ms. Zeman re strategy for demand, negotiations with Defendant, and 10/12/16 status report deadline (0.7).	1.00	hrs	425.00
10/03/16	SKJ	Update conference with Mr. Mark Troutman on settlement discussions.	0.20	hrs	80.00
10/06/16	MHT	Reviewed additional issues for substance of demand letter to prep for call with Mr. Gibbs re planning and strategy for negotiations (0.4). Researched means to resolve and mediators for case (0.7). Reviewed, edited, and planned re draft demand letter (0.9).	2.00	hrs	850.00
10/06/16	GMT	Conference with Mark Troutman re upcoming report to court (0.2); phone call with co-counsel Eric Gibbs re settlement posture and report to court (0.5).	0.70	hrs	346.50
10/06/16	SKJ	Review strategy communication re: selection of potential mediator.	0.10	hrs	40.00
10/06/16	SKJ	Review status of settlement talks and evaluate potential mediation options/mediators with Mr. Mark Troutman.	0.40	hrs	160.00
10/07/16	MHT	Tracked edits and emailed Mr. Gibbs re demand letter (0.5). Considerations re 10/12/16 status report for Judge Watson (0.2). Reviewed/assigned time and expense reporting (0.1).	0.80	hrs	340.00
10/07/16	SKJ	Review correspondence from Messrs. Eric Gibbs, Greg Travaglio, and Mark Troutman re: demand letter and review demand letter.	0.20	hrs	80.00
10/10/16	MHT	Review/outline issues for status report due on 10/12/16 (0.2). Email with co-counsel re joint status report and outline (0.1). Reviewed final draft of initial demand letter (0.2).	0.50	hrs	212.50
10/11/16	MHT	Reviewed draft status report for Judge Watson.	0.50	hrs	212.50
10/11/16	SKJ	Review update letter and suggest edits.	0.10	hrs	40.00
10/12/16	MHT	Finalize/file joint status report for Judge (0.2). Correspond with all counsel re additional edits to status report (0.1). Considered appropriate mediators and means to settle case (0.2). Reviewed/forwarded time and expense report	0.60	hrs	255.00

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		to Lead Counsel (0.1).	
10/12/16	BL	Code pre-bill with corresponding categories; prepare-bi-monthly fee and expense spreadsheets.	0.50 hrs 67.50
10/13/16	SKJ	Evaluate mediation strategy and its presentation to the Court.	0.10 hrs 40.00
10/21/16	MHT	Reviewed pending motions before Judge Watson to evaluate for settlement negotiation purposes.	0.20 hrs 85.00
10/27/16	MHT	F/u w/ counsel re add'l time and expenses for consideration	0.20 hrs 85.00
10/27/16	MHT	Overview of time submissions from Mr. McMorrow and Mr. Turin after f/u email	0.20 hrs 85.00
10/31/16	MHT	Reviewed outstanding issues affecting settlement negotiations and continuing w/ case	0.30 hrs 127.50
10/31/16	MHT	Reviewed/responded to Plaintiff Mr. Prychitko's email with recall letter attached re advice on how to proceed (inc. basic research re recall and repair).	0.50 hrs 212.50
10/31/16	MHT	T/c w/ Ms. Zeman re update on case, incl. update to co-counsel.	0.20 hrs 85.00
11/01/16	MHT	Review for potential f/u w/ Mr. Prychitko re transmission repairs involving PCM	0.20 hrs 85.00
11/03/16	MHT	Coordination re mediation issues w/ potential mediator Frank Ray	0.40 hrs 170.00
11/03/16	GMT	Phone call with potential Mediator, Frank Ray regarding availability and retention (0.1); email to Frank Ray regarding retention ((0.1); conference with Mark Troutman re Mediation (0.1); email to Eric Gibbs regarding Mr. Ray (0.1).	0.40 hrs 198.00
11/04/16	GMT	Email to Eric Gibbs regarding mediation.	0.10 hrs 49.50
11/07/16	MHT	Reviewed Court Orders re filings and update due to Court on 11/14/16	0.20 hrs 85.00
11/07/16	MHT	Review new Complaint filed in Missouri after related action filing with JPML.	0.20 hrs 85.00
11/08/16	MHT	Reviewed and planned re appropriate report to Judge Watson to keep negotiations advancing	0.20 hrs 85.00
11/11/16	MHT	Analysis of issues and means to convey cont'd settlement efforts to Judge Watson in report due on 11/14/16.	0.30 hrs 127.50

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11/14/16	MHT	Planning and coordination for status report to Judge Watson re settlement efforts.	0.40	hrs	170.00
11/14/16	MHT	Reviewed and edited draft status report circulated by Ms. Kiser (incl. time conferring w/ co-counsel re edits and strategy).	0.80	hrs	340.00
11/14/16	GMT	Review and edits to draft report.	0.30	hrs	148.50
11/14/16	SKJ	Review nine emails between co-counsel on edits to joint status report to the Court and production of sales documents.	0.40	hrs	160.00
11/14/16	SKJ	Review emails from co-counsel and suggested edits on joint status report to the Court. Review report and send suggested edits to Mr. Mark Troutman.	0.40	hrs	160.00
11/14/16	SKJ	Review update email from Mr. Mark Troutman re: status report for Judge Watson.	0.10	hrs	40.00
11/15/16	MHT	Reviewed issues re advancing case to mediation, incl. mediator and other tasks necessary to advocate for class.	0.40	hrs	170.00
11/23/16	MHT	Evaluated add'l options for settlement negotiations w/ Honda.	0.30	hrs	127.50
11/30/16	MHT	Review, evaluate, and email w/ co-counsel re NBC Chicago's report re vibration in 2016 MY Honda CR-Vs (call from reporter).	0.30	hrs	127.50
11/30/16	MHT	Reviewed add'l mediator options per Honda's concern w/ initial proposed mediator.	0.30	hrs	127.50
12/01/16	MHT	Consideration of impact and review of news articles for Honda CR-V complains on 2016 MY.	0.20	hrs	85.00
12/05/16	MHT	Planning/correspond w/ team re joint status report due on 12/14/16 and mediation considerations.	0.30	hrs	127.50
12/05/16	MHT	Reviewed effect of potentially expanding class to 2016 MY on case and negotiations.	0.20	hrs	85.00
12/05/16	GMT	Emails to Eric Gabbs re mediation (0.2); conference with Mark Troutman re mediation (0.1); phone call to Frank Ray (0.1); phone call with Carol Ray (0.1); email to Eric Gabbs regarding Frank Ray as mediator (0.1).	0.60	hrs	297.00
12/05/16	SKJ	Review co-counsel emails re: scheduling of mediation and selection of the mediator.	0.30	hrs	120.00
12/06/16	MHT	Review and f/u w/ all co-counsel re time	0.30	hrs	127.50

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		reporting due on 12/15/16 (0.2). Further considerations re mediation and settlement potential (0.1).	
12/06/16	BL	Request pre-bill from accounting for bi-monthly reporting.	0.10 hrs 13.50
12/07/16	MHT	Review and respond to putative class member Jerry Dillon's inquiries re case (0.3). F/u email w/ Mr. Gibbs re direction on Mr. Dillon (0.1).	0.40 hrs 170.00
12/08/16	MHT	Strategy re effect of pending motions after conversation w/ Judge Watson and clerk (nothing substantive or ex parte) (0.3). Review and prep re range of options for mediation (0.3).	0.60 hrs 255.00
12/09/16	MHT	Review/forward message from Chicago news channel re scope of class in case.	0.20 hrs 85.00
12/09/16	MHT	Reviewed new time reports and underlying entries as billing attorney to forward reports to Mr. Gibbs per timekeeping protocol.	0.30 hrs 127.50
12/09/16	BL	Prepare bi-monthly report of fees and expenses.	0.50 hrs 67.50
12/12/16	MHT	Review, assess, and email Mr. Gibbs re outstanding items and issues for attention this week.	0.20 hrs 85.00
12/12/16	SKJ	Review correspondence re: mediation and case management issues.	0.20 hrs 80.00
12/13/16	MHT	Correspond w/ Mr. Dillon re service as potential Ohio class representative.	0.10 hrs 42.50
12/13/16	MHT	Draft email to respond to press inquiries re scope of class.	0.20 hrs 85.00
12/13/16	MHT	Email w/ Mr. Gibbs, incl. proposed draft response to media inquiries in the case.	0.20 hrs 85.00
12/14/16	MHT	Plan/review/correspond w/ Mr. Gibbs re Honda's proposal re mediation.	0.40 hrs 170.00
12/14/16	MHT	Finalize/forward billable hours and expenses to Mr. Gibbs et al. per timekeeping protocol.	0.20 hrs 85.00
12/14/16	MHT	Review items for inclusion in joint status report.	0.40 hrs 170.00
12/14/16	MHT	Review/edit/file joint status report, incl. negotiation w/ Honda.	0.70 hrs 297.50
12/14/16	MHT	Initial receipt, review, and analysis of Honda's response to Plaintiffs' initial settlement demand.	0.50 hrs 212.50



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12/14/16	GMT	Emails to Frank Ray and Eric Gibbs re mediation.	0.20 hrs 99.00
12/14/16	GMT	Review and edits to draft Joint Report.	0.20 hrs 99.00
12/14/16	SKJ	Review correspondence re: and discuss mediation and schedule with co-counsel.	0.40 hrs 160.00
12/15/16	MHT	Cont'd analysis and review of Honda's response to Plaintiffs' initial settlement demand (incl. review of materials previously received on topics raised re no need for repairs).	0.60 hrs 255.00
12/15/16	GMT	Phone conference with Mark Troutman (0.1); review and edits to email to Eric Gibbs regarding mediation (0.2).	0.30 hrs 148.50
12/16/16	MHT	Review/forward add'l time reports to Mr. Gibbs et al.	0.10 hrs 42.50
12/20/16	MHT	Reviewed supplemental materials from Honda per Plaintiffs' follow up questions.	0.50 hrs 212.50
12/20/16	MHT	Review and assess Court Order granting stay until 3/14/17.	0.10 hrs 42.50
12/27/16	MHT	Review/evaluate supplemental materials from Honda re negotiations (0.4). Email w/ co-counsel re prep for mediation with supplemental documents (0.1).	0.50 hrs 212.50
01/03/17	GMT	Conference with Mark Troutman re upcoming mediation (0.1); review of settlement material submitted by Honda (0.2).	0.30 hrs 148.50
01/10/17	MHT	Review and assess issues and complaints re 2016 MY CR-Vs (0.2). Planning and strategy re mediation (0.2).	0.40 hrs 170.00
01/16/17	GMT	Conference with Mark Troutman regarding class issues.	0.10 hrs 49.50
01/18/17	MHT	Reviewed, planned, and emailed co-counsel re Honda's letter re exemplar vehicles and opportunity for inspection.	0.20 hrs 85.00
01/23/17	MHT	Began review/planning re issues for call w/ Mr. Gibbs et al. on Wednesday.	0.20 hrs 85.00
01/24/17	MHT	Outlined issues to review to prepare for mediation.	0.30 hrs 127.50
01/25/17	MHT	Reviewed past information from Honda to prep for mediation (0.1). Correspond w/ Mr. Gibbs re call to prep for mediation (0.1).	0.20 hrs 85.00
01/26/17	GMT	Conference with M. Troutman and S. Judge	0.30 hrs 148.50



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		regarding mediation.		
01/26/17	SKJ	Review co-counsel emails re: meeting to discuss preparations and strategy for mediation settlement talks.	0.10 hrs	40.00
01/30/17	MHT	Review of relevant documents (1.7) and t/c w/ Mr. Gibbs et al. re preparation for mediation on 3/7-3/8 (0.3). F/u planning and evaluation re mediation prep (0.3).	2.30 hrs	977.50
01/30/17	SKJ	Conference call with co-counsel re: development of strategy for upcoming mediation and identification of core settlement values (1.0). Post-call discussion with Mr. Greg Travaglio and Mr. Mark Troutman (0.5).	1.50 hrs	600.00
02/01/17	MHT	Review and prep re issues for mediation in March w/ Honda.	0.20 hrs	85.00
02/01/17	GMT	Phone conference with co-counsel (1.0 hr); conference with M. Troutman and S. Judge (.5 hr).	1.50 hrs	742.50
02/01/17	GMT	Review of documents for telephone conference.	1.30 hrs	643.50
02/03/17	MHT	Review and plan re use of OSI evidence and other persuasive methods for Honda at mediation.	0.40 hrs	170.00
02/06/17	MHT	Review/assess prep for mediation.	0.20 hrs	85.00
02/06/17	MHT	Emailed Honda CR-V owner Jerry Dillon re setting up telephone interview re vehicle experiences.	0.10 hrs	42.50
02/06/17	BL	Prepare fee and expense reporting for February 15th deadline.	0.50 hrs	67.50
02/07/17	MHT	Planning w/ co-counsel re exemplar vehicle contact in Columbus, Ohio, for purposes of mediation.	0.30 hrs	127.50
02/08/17	MHT	Prep/t/c w/ w/ Brescelli re local vehicle to potentially serve as exemplar during mediation.	0.30 hrs	127.50
02/09/17	MHT	Planning re mediation. T/c and email w/ local Honda CR-V owner re inspection of vehicle prior to mediation. Coordination re time, date, and equipment for vehicle inspection.	0.40 hrs	170.00
02/10/17	MHT	F/u email w/ Ohio OSI re involvement in case and preparation for mediation.	0.10 hrs	42.50
02/13/17	MHT	Email and planning re use of Jerry Dillon's OSI story for mediation and negotiations.	0.20 hrs	85.00

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02/14/17	MHT	Cont'd prep and analysis for mediation.	0.30	hrs	127.50
02/16/17	GMT	Emails to F. Ray (0.1) and E. Gibbs (0.2) regarding mediation.	0.30	hrs	148.50
02/17/17	MHT	Strategy/prep for mediation.	0.20	hrs	85.00
02/17/17	GMT	Emails to F. Ray (0.1) and E. Gibbs (0.1) regarding mediation.	0.20	hrs	99.00
02/20/17	MHT	Research/review to prep for mediation.	0.30	hrs	127.50
02/21/17	GMT	Emails to F. Ray and E. Gibbs regarding mediation.	0.20	hrs	99.00
02/22/17	MHT	Reviewed mediator's email with terms re mediation (0.2). Planning re mediation (0.4). Correspond re mediator's terms and prep for mediation w/ co-counsel (0.2)l.	0.80	hrs	340.00
02/22/17	GMT	Emails to F. Ray (0.1) and E. Gibbs (0.2) regarding mediation.	0.30	hrs	148.50
02/23/17	MHT	Cont'd prep for mediation w/ mediator (0.1). Prep for inspection of vehicle tomorrow with eye towards mediation (0.1).	0.20	hrs	85.00
02/24/17	MHT	Cont'd prep/analysis re issues for mediation, incl. interviews, mediation statement, and inspection of vehicle (1.1). Travel/inspection of vehicle in Gahanna, Ohio, facing significant vibration post-repair (1.3). Prepared memo to Mr. Gibbs et al. re inspection of vehicle with Ms. Beschelli and recommendations for use at mediation (0.6).	3.00	hrs	1,275.00
02/24/17	GMT	Conference with M. Troutman regarding mediation (.2); email to Amy Zeman (.3).	0.50	hrs	247.50
02/24/17	SKJ	Prepare for and attend client interview/vehicle test drive re: Ms. Sabina Breschelli.	1.30	hrs	520.00
02/24/17	SKJ	Review and make suggested edit to Mr. Greg Travaglio's email re: mediation preparation.	0.10	hrs	40.00
02/25/17	MHT	Prep/review re issues for mediation.	0.20	hrs	85.00
02/27/17	MHT	Planning, review, and edits for issues to raise in mediation statement (0.1). Assisted with review of facts and evidence in support of mediation positions (0.1).	0.20	hrs	85.00
02/27/17	MHT	Prep and evaluation of means to prepare for mediation.	0.40	hrs	170.00
02/27/17	MHT	Review/evaluation of issues in draft mediation statement.	0.40	hrs	170.00

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02/27/17	SKJ	Review Plaintiffs' mediation position statement and make suggested edits (0.5). Draft cover email and send draft with suggested edits to Mr. Greg Travalio and Mr. Mark Troutman (0.1).	0.60	hrs	240.00
02/28/17	MHT	Review/assess final edits to mediation statement (0.2). Planning/evaluation of issues for mediation, incl. bifurcation of attorneys' fees issue (0.4). Reviewed, evaluated, and planned re final versions of parties' mediation statements (0.3).	0.90	hrs	382.50
02/28/17	SKJ	Review correspondence re: mediation statements (0.1). Review mediation statements (0.1). Review email from mediator Mr. Frank Ray (0.1).	0.30	hrs	120.00
03/01/17	GMT	Review and edits to final mediation statement.	0.40	hrs	198.00
03/01/17	GMT	Review and edits to mediation statement.	0.80	hrs	396.00
03/01/17	GMT	Conference with M. Troutman regarding mediation and vehicle inspection video.	0.30	hrs	148.50
03/02/17	MHT	Reviewed and prep w/ team after Mr. Gibbs' call w/ Mr. Mallow to prep for mediation (0.3). Plan/overview issues for mediation (0.2).	0.50	hrs	212.50
03/02/17	GMT	Research into arbitration and UDAP statutes; comments on Honda mediation letter; emails to co-counsel.	1.30	hrs	643.50
03/02/17	GMT	Review of Honda Mediation statement and exhibits (1.7) research (.5); emails to co-counsel (.3); review of other discovery (.2).	2.70	hrs	1,336.50
03/03/17	MHT	Planning/review for mediation, incl. arguments, class issues, notice, and dealing w/ anecdotal consumer stories.	1.00	hrs	425.00
03/05/17	MHT	Prep/review to plan for mediation.	0.40	hrs	170.00
03/06/17	MHT	Review/coordination for mediation, incl. review of documents and discovery from Honda (2.5). Met w/ co-counsel re mediation prep and planning (2.0).	4.50	hrs	1,912.50
03/06/17	SKJ	Meeting with Mr. Eric Gibbs, Ms. Amy Zeman, Mr. Greg Travalio, and Mr. Mark Troutman re: strategy for March 7 mediation.	2.00	hrs	800.00
03/07/17	MHT	Prep/met with co-counsel/mediated case w/ Honda and mediator Frank Ray.	11.00	hrs	4,675.00

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03/07/17	GMT	Mediation.	7.30 hrs		3,613.50
03/07/17	GMT	Preparation for mediation (.8); mediation (7.9).	8.70 hrs		4,306.50
03/07/17	SKJ	Attend portion of mediation and offer recommendations.	0.40 hrs		160.00
03/07/17	SKJ	Discuss mediation strategy with Mr. Mark Troutman.	0.50 hrs		200.00
03/08/17	MHT	Cont'd mediation session w/ Frank Ray (7.9). Met and planned w/ co-counsel re follow-up (0.4). Reviewed Court's Orders and requirements for f/u after mediation (0.2).	8.50 hrs		3,612.50
03/08/17	SKJ	Attend mediation and offer recommendations.	0.50 hrs		200.00
03/08/17	SKJ	Attend mediation and offer recommendations.	0.30 hrs		120.00
03/09/17	MHT	Outline/plan re means to negotiate remaining issues w/ Honda (0.5). Reviewed/researched jurisprudence in Court and with Judge re remaining issues for settlement (0.5). General overview of time submitted to assess risk/benefit of contested fee dispute (0.3).	1.30 hrs		552.50
03/09/17	SKJ	Discuss potential fees and multipliers with Mr. Mark Troutman.	0.40 hrs		160.00
03/09/17	SKJ	Draft and send email to Mr. Eric Gibbs re: provision of informal notice to the Court of settlement.	0.20 hrs		80.00
03/13/17	MHT	Review/plan re appropriate update to Court re progress w/ settlement (0.2). Email w/ co-counsel re Court update (0.1). T/c w/ Mr. Gibbs re planning for conference w/ Judge Watson re settlement progress. (0.2)	0.50 hrs		212.50
03/13/17	MHT	Correspond/planning w/ Honda's counsel re call to Court re settlement position (per Court Order).	0.10 hrs		42.50
03/13/17	SKJ	Discussion of notification to the Court.	0.20 hrs		80.00
03/14/17	MHT	Prepare for conference w/ Court re settlement and call w/ Court and Honda's counsel re update on settlement and negotiations.	0.80 hrs		340.00
03/14/17	SKJ	Receive call from the Court re: time of conference call with Judge Watson.	0.20 hrs		80.00
03/14/17	SKJ	Place call to the Court to arrange conference call with Judge Watson.	0.10 hrs		40.00
03/14/17	SKJ	Call to the Judge to provide notice of settlement and request extension of stay.	0.20 hrs		80.00

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03/15/17	MHT	Drafted joint motion to Court re 45-day extension to complete negotiations (incl. negotiations/edits w/ Honda's counsel via email).	0.60 hrs 255.00
03/15/17	MHT	Planned re future negotiations re attorney fee issue and means to avoid litigation, as well as the risks for both sides in litigating attorneys' fees to educate negotiations.	0.40 hrs 170.00
03/15/17	SKJ	Review draft motion and proposed order for extension. Make suggested edits.	0.30 hrs 120.00
03/17/17	MHT	Reviewed status of negotiations over motion to Court re extending stay for an add'l 45 days pending negotiations (0.2). Planned re issues for fee and cost negotiations w/ Honda (0.3).	0.50 hrs 212.50
03/17/17	MHT	Plan/evaluate issues re settlement, incl. call w/ co-counsel.	0.40 hrs 170.00
03/17/17	MHT	Final edits/filing/emailing Judge re motion to stay case and proposed order.	0.30 hrs 127.50
03/17/17	SKJ	Review and make suggested edits to redlined joint motion and proposed order (0.2). Discuss with Mr. Mark Troutman (0.2).	0.40 hrs 160.00
03/17/17	SKJ	Call with Mr. James Radzewicz (0.3) Draft and send summary email to co-counsel (0.2).	0.50 hrs 200.00
03/27/17	MHT	Review/plan re call w/ other Plaintiffs' lawyers re settlement status.	0.30 hrs 127.50
03/27/17	GMT	Conference with M. Troutman regarding next steps.	0.10 hrs 49.50
03/28/17	MHT	Prep, assist Mr. Gibbs, and attend call w/ other Plaintiffs' counsel re status of case and cont'd settlement negotiations.	1.30 hrs 552.50
04/03/17	MHT	Reviewed issues re ongoing settlement negotiations w/ Honda to finalize agreement.	0.20 hrs 85.00
04/04/17	MHT	Review/circulated MOU re settlement to other Plaintiffs' counsel for questions.	0.10 hrs 42.50
04/10/17	MHT	Reviewed new authority re issues w/ terms in settlement agreement and dispute over fees.	0.30 hrs 127.50
04/11/17	MHT	Review/approve/evaluate fees and expenses to verify and report to Mr. Gibbs et al.	0.20 hrs 85.00
04/11/17	BL	Prepare bi-monthly billing report.	0.50 hrs 67.50
04/12/17	MHT	Reviewed outstanding issues from mediation, incl. draft term sheet and issues w/ attorneys'	0.20 hrs 85.00

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		fees negotiation.	
04/19/17	MHT	Reviewed timetable and issues w/ settlement approval w/ Court.	0.20 hrs 85.00
04/24/17	MHT	Review/update re status of ongoing settlement negotiations with Defendant.	0.20 hrs 85.00
04/28/17	MHT	Prep/evaluate issues for 5/2/17 status conference w/ Judge Watson and Magistrate Judge Deavers.	0.20 hrs 85.00
04/28/17	SKJ	Case status update meeting with Mr. Greg Travaglio and Mr. Mark Troutman.	0.10 hrs 40.00
05/01/17	MHT	Planning/evaluation re conference w/ Court on 5/2/17.	0.20 hrs 85.00
05/02/17	MHT	Coordination w/ Court, co-counsel, and Honda re topics and agenda for call w/ Judge Watson today re settlement negotiation progress (0.4). Call w/ Judge Watson re update on settlement and stay until 6/30/17 to complete settlement-related tasks (0.3).	0.70 hrs 297.50
05/02/17	GMT	Status conference with judge.	0.30 hrs 148.50
05/02/17	SKJ	Speak with Chambers re: case status update conference call with Judge Watson.	0.30 hrs 120.00
05/02/17	SKJ	Case status update conference call with Judge Watson.	0.10 hrs 40.00
05/17/17	MHT	Reviewed status and issues w/ settlement to complete before Court's lifting of stay on 6/30/17.	0.20 hrs 85.00
05/24/17	MHT	T/c w/ Mr. Stein re review and edits for settlement agreement and release.	0.40 hrs 170.00
05/25/17	MHT	Correspond w/ class member re complaints with class vehicle (0.2). Correspond w/ co-counsel re cont'd issues w/ dealership notification re TSBs (0.1).	0.30 hrs 127.50
05/26/17	MHT	Began edits/review of settlement stipulation and release of claims.	0.80 hrs 340.00
05/27/17	SKJ	Conference call with Mr. Greg Travaglio and Mr. Mark Troutman re: settlement agreement.	0.20 hrs 80.00
05/28/17	MHT	Cont'd review/edits to settlement stipulation.	0.50 hrs 212.50
06/12/17	MHT	Review/outline/f/u re issues w/ final settlement agreement and preliminary approval papers for Court by June 30th.	0.20 hrs 85.00

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06/13/17	MHT	Review/finalize/send time and expense reports to Mr. Gibbs.	0.20 hrs		85.00
06/13/17	BL	Prepare bi-monthly billing and expense report.	0.50 hrs		67.50
06/20/17	MHT	Correspond w/ class member re inquiry on settlement status.	0.20 hrs		85.00
06/23/17	MHT	Reviewed re status of settlement negotiations and progress (0.2). Email w/ co-counsel to coordinate report to Court re end of stay on 6/30/17 (0.1).	0.30 hrs		127.50
06/27/17	MHT	T/c w/ Mr. Gibbs re update on settlement negotiations w/ Honda over settlement agreement.	0.40 hrs		170.00
06/27/17	MHT	Reviewed and evaluated re conference w/ Court on stay that ends on 6/30/17.	0.20 hrs		85.00
06/27/17	MHT	Began legal research re procedure for R.23(b)(2) class and extent to which Court approval is needed.	0.40 hrs		170.00
06/27/17	MHT	Began review/assessment of settlement agreement from Honda.	1.50 hrs		637.50
06/27/17	MHT	Began research/planning re issues w/ preliminary approval papers.	0.30 hrs		127.50
06/27/17	GMT	Review and edits to Settlement Agreement draft	1.20 hrs		594.00
06/27/17	GMT	Review and edits to motion to interpret P.O.	1.20 hrs		594.00
06/27/17	SKJ	Discuss upcoming status report to the Court and related issues with Mr. Mark Troutman.	0.20 hrs		80.00
06/28/17	MHT	Cont'd review/evaluation of important issues for preliminary approval papers, incl. legal research into local jurisprudence to guide draft (0.9). T/c w/ co-counsel re organization of preliminary approval papers (0.5).	1.40 hrs		595.00
06/28/17	GMT	Phone conference with co-counsel (.5 hr); conference with Mark Troutman re settlement agreement (.3 hr)	0.80 hrs		396.00
06/28/17	SKJ	Conference call with co-counsel re: settlement discussions and status conference update to the Court.	0.50 hrs		200.00
06/29/17	MHT	Planning/drafting of joint status report for Judges re status of settlement.	0.60 hrs		255.00
06/29/17	MHT	Correspond and evaluate w/ co-counsel communication to Court re status update on	0.20 hrs		85.00



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		ending of stay.	
06/29/17	SKJ	Review draft status report. Discuss with Mr. Mark Troutman and Mr. Greg Travaglio.	0.40 hrs 160.00
06/30/17	MHT	Prep/t/c w/ co-counsel re final negotiations and issues w/ settlement agreement and report to Court.	0.40 hrs 170.00
06/30/17	MHT	Finished negotiations, finalized, and filed joint status report for Court.	0.30 hrs 127.50
06/30/17	SKJ	Review draft status report, participate in conference call with co-counsel, make suggested edits to report, and send redline version of report to Mr. Eric Gibbs.	0.60 hrs 240.00
07/03/17	MHT	Cont'd efforts/review for settlement and presentation to Court.	0.20 hrs 85.00
07/05/17	MHT	Began review and evaluation of Honda's further edits to settlement agreement and legal arguments re class notice.	0.20 hrs 85.00
07/06/17	MHT	Initial research/review re issues w/ class notice under terms of settlement.	1.20 hrs 510.00
07/06/17	MHT	Review/further edits to redline of settlement agreement from Honda.	0.60 hrs 255.00
07/06/17	GMT	Review and comments to draft settlement agreement; email to Eric Gibbs	0.80 hrs 396.00
07/07/17	MHT	Final review/evaluation of case authority re requirement of class notice under R.23(b)(2).	0.50 hrs 212.50
07/09/17	MHT	Research/evaluation of Honda's authority offered for notion that notice is unnecessary for R.23(b)(2) class.	0.40 hrs 170.00
07/10/17	MHT	Review/coordination of issues and exhibits needed for preliminary approval filing.	0.30 hrs 127.50
07/12/17	MHT	Reviewed legal issues and authority re fee dispute before Judge.	0.30 hrs 127.50
07/13/17	MHT	Reviewed/edited next set of issues for negotiations over settlement agreement language (0.2). Consideration of issues to put before Judge Watson for preliminary approval support (0.2).	0.40 hrs 170.00
07/13/17	SKJ	Review draft settlement agreement and multiple emails from co-counsel re: agreement issues.	0.60 hrs 240.00
07/14/17	MHT	Reviewed issues and planning re support for	0.20 hrs 85.00



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		preliminary approval and timing for subsequent filings toward final approval.	
07/17/17	MHT	Planning/coordination re issues w/ preliminary approval papers.	0.30 hrs 127.50
07/18/17	MHT	Correspond w/ Mr. Gibbs and review of draft notice to be posted on Owner Link website per settlement.	0.30 hrs 127.50
07/19/17	MHT	Edits/review of long form settlement notice, website description, and other notices and letters attached to Settlement Agreement.	2.20 hrs 935.00
07/19/17	MHT	Worked on further details re preliminary approval and settlement documents.	0.20 hrs 85.00
07/19/17	SKJ	Review and make suggested edits to notices.	0.90 hrs 360.00
07/20/17	MHT	Outline, review, and coordination of issues for preliminary approval filing.	0.30 hrs 127.50
07/20/17	MHT	Planning and t/cs w/ Mr. Gibbs re issues w/ negotiations and Honda and inability to get named plaintiffs on settlement agreement because not completed.	0.90 hrs 382.50
07/20/17	SKJ	Pre-conference call discussion with Mr. Mark Troutman (.1). Conference call with Mr. Eric Gibbs and Mr. Troutman (.3). Second call with Mr. Gibbs and Mr. Troutman (.4).	0.80 hrs 320.00
07/20/17	SKJ	Review preliminary approval brief and make notes for redlining.	0.30 hrs 120.00
07/21/17	MHT	Planned/coordinated re client outreach re settlement.	0.20 hrs 85.00
07/21/17	MHT	Initial receipt and review of draft motion for preliminary approval (stopped based upon issues in negotiations).	0.30 hrs 127.50
07/21/17	MHT	Review/plan re issues w/ preliminary approval papers and call w/ Judge Watson's chambers re extension and call next week.	0.40 hrs 170.00
07/21/17	MHT	Correspond w/ Plaintiff Tom Prychitko re update on settlement and his opinion on relief.	0.10 hrs 42.50
07/21/17	SKJ	Call to Judge Watson's chambers to provide notice of issues with filing deadlines and to request a telephone conference.	0.10 hrs 40.00
07/24/17	MHT	Correspond with class member inquiring about settlement.	0.10 hrs 42.50
07/24/17	MHT	Evaluation issues for 7/26/17 conference	0.20 hrs 85.00

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		scheduled by Judge Watson.	
07/26/17	MHT	Review/assess Honda's continued issues with draft settlement agreement.	0.40 hrs 170.00
07/26/17	MHT	Prep/t/c w/ Mr. Gibbs re planning for call w/ Judge Watson re settlement.	0.30 hrs 127.50
07/26/17	MHT	Prepare/coordinate for meeting w/ Plaintiff Tom Prychitko re settlement.	0.20 hrs 85.00
07/26/17	SKJ	Review draft settlement agreement and email co-counsel with possible issue and suggested revision/solution.	0.70 hrs 280.00
07/26/17	SKJ	Call with Mr. Eric Gibbs and Mr. Mark Troutman re: draft settlement agreement prior to conference call with the Court.	0.20 hrs 80.00
07/26/17	SKJ	Telephone conference with Judge Watson and opposing counsel, followed by post-call strategy discussion with Mr. Mark Troutman.	0.20 hrs 80.00
07/27/17	MHT	Review/t/c w/ Plaintiff Tom Prychitko re background on settlement agreement.	0.40 hrs 170.00
07/27/17	MHT	Initial receipt and review of draft motion for preliminary approval.	0.20 hrs 85.00
07/28/17	MHT	Cont'd w/ review, edits, and evaluation of preliminary approval papers, incl. motion, proposed Order, and injunctive relief order.	2.10 hrs 892.50
07/28/17	SKJ	Review draft preliminary approval motion and two proposed orders and make suggested edits.	1.90 hrs 760.00
08/07/17	MHT	Review/analysis of work needed for August 10th deadline for filing preliminary approval papers.	0.20 hrs 85.00
08/09/17	MHT	Review/assess preliminary approval filings and status of exhibits for tomorrow.	0.20 hrs 85.00
08/10/17	MHT	T/c w/ Court re issues w/ preliminary approval papers (0.3). Email w/ Mr. Gibbs re finalizing settlement agreement (0.1).	0.40 hrs 170.00
08/10/17	BL	Bi-monthly reporting.	0.50 hrs 67.50
08/10/17	SKJ	Conference call with Mr. Eric Gibbs re: settlement update (.2); call to the Court re: status of settlement and filing of papers (.1); draft and send follow-up email to Mr. Gibbs (.1).	0.40 hrs 160.00
08/11/17	MHT	Review, finalize, and email w/ lead counsel re current status of fees and expenses.	0.20 hrs 85.00

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08/11/17	MHT	Began research and evaluation of options for fee dispute before Judge Watson.	0.30 hrs		127.50
08/11/17	BL	Prepare bi-monthly status report.	0.50 hrs		67.50
08/15/17	MHT	Reviewed outstanding issues for settlement and preliminary approval.	0.20 hrs		85.00
08/16/17	GMT	Review of draft settlement agreement (.5 hr); email to Eric Gibbs (.2 hr)	0.70 hrs		346.50
08/17/17	MHT	Reviewed updated settlement agreement draft from Honda. Outlined issues w/ proposed edits.	0.70 hrs		297.50
08/23/17	MHT	Reviewed of preliminary approval motion and consideration of add'l exhibits.	0.20 hrs		85.00
08/24/17	MHT	Reviewed penultimate version of settlement agreement (0.1). Email w/ co-counsel re issues w/ settlement agreement (0.1).	0.20 hrs		85.00
08/24/17	GMT	Review of draft settlement agreement (.4 hr); email to co-counsel (.2)	0.60 hrs		297.00
08/28/17	MHT	Reviewed status of negotiations and history of settlement agreement versions to prepare for 8/29/17 status conference w/ Judge Watson.	0.40 hrs		170.00
08/28/17	MHT	Reviewed add'l edits to settlement agreement from AHM.	0.00 hrs		N/C
08/29/17	MHT	Coordinate and plan re final steps necessary to get settlement approval in front of the clients and the Court.	0.30 hrs		127.50
08/29/17	MHT	Call w/ co-counsel re plan, prep, and coordination re settlement agreement.	0.30 hrs		127.50
08/29/17	MHT	Attended status conference via telephone w/ Judge Watson re settlement agreement and proposed schedule re preliminary approval.	0.30 hrs		127.50
08/29/17	SKJ	Conference call with Mr. Eric Gibbs and co-counsel prior to call with the Court (.3). Conference call with Judge Watson and all counsel (.2).	0.50 hrs		200.00
09/05/17	MHT	Review/email w/ Plaintiff Tom Prychitko re final settlement document without definitive attorney's fees and costs to answer questions.	0.20 hrs		85.00
09/05/17	MHT	Email w/ co-counsel re coordination of tasks before filing for preliminary approval.	0.10 hrs		42.50
09/11/17	MHT	Outlined remaining issues needed for preliminary approval papers due on 9/15/17.	0.30 hrs		127.50
09/11/17	SKJ	Discuss preliminary approval papers and	0.20 hrs		80.00

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		outstanding fees and costs issues with Mr. Greg Travaglio and Mr. Mark Troutman. Review follow-up email by Mr. Troutman.	
09/12/17	MHT	Review/planning re issues w/ named Plaintiffs' issues w/ settlement terms.	0.30 hrs 127.50
09/12/17	MHT	Email w/ Plaintiff Tom Prychitko re f/u questions on settlement agreement	0.10 hrs 42.50
09/13/17	MHT	Review/correspond w/ Plaintiff Prychitko re his questions about settlement agreement details.	0.20 hrs 85.00
09/15/17	MHT	Planning/analysis re cont'd negotiations w/ Honda over final approval papers and review by class reps w/ Mr. Gibbs.	0.80 hrs 340.00
09/15/17	SKJ	Discuss status of settlement with Mr. Mark Troutman (.3). Call with co-counsel Mr. Eric Gibbs re: status (.2). Call with Judge Watson's chambers (.2). Follow-up re: call (.2).	0.90 hrs 360.00
09/19/17	MHT	Reviewed outstanding issues w/ settlement before getting clients' approval.	0.30 hrs 127.50
09/19/17	MHT	Reviewed S.D. Ohio fee jurisprudence to assist w/ negotiations on attorney's fees and costs.	0.40 hrs 170.00
09/19/17	MHT	Reviewed Order from Court setting 10/18/17 in-person status conference and advance planning.	0.20 hrs 85.00
09/29/17	MHT	Reviewed and responded to Plaintiff Tom Prychitko's questions concerning settlement agreement.	0.20 hrs 85.00
10/02/17	GMT	Emails to Eric Gibbs re draft for demand	0.20 hrs 99.00
10/07/17	GMT	Phone conference with Eric Gibbs regarding ongoing settlement issues.	0.40 hrs 198.00
10/11/17	MHT	Review, strategy, and preparation of topics for hearing w/ Judge Watson on 10/18/17.	0.30 hrs 127.50
10/12/17	MHT	Review/planning for status conference before Judge Watson re lack of progress w/ settlement papers.	0.20 hrs 85.00
10/12/17	BL	Bi-monthly reporting.	0.50 hrs 67.50
10/16/17	MHT	Prep/planning for conference w/ Judge Watson on 10/18/17.	0.40 hrs 170.00
10/16/17	MHT	Receipt and review of edited settlement documents from Honda (notices and exhibits to effectuate settlement).	0.60 hrs 255.00

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10/16/17	MHT	T/c w/ Mr. Gibbs re preparation for conference w/ Judge Watson on 10/18/17 and finalization of settlement documents.	0.30 hrs		127.50
10/16/17	MHT	Prep/conference w/ co-counsel re coordination for events to complete settlement and planning for conference w/ Court scheduled for 10/18/17.	0.40 hrs		170.00
10/16/17	MHT	Planning/coordination w/ Honda's counsel re moving in-person status conference before Judge Watson.	0.20 hrs		85.00
10/16/17	MHT	T/c w/ Court and all counsel re moving status conference on 10/18/17.	0.30 hrs		127.50
10/16/17	MHT	Finalized and filed joint motion to continue.	0.20 hrs		85.00
10/16/17	MHT	Review, teleconferences, and emails w/ co- and opposing counsel to finalize joint motion to continue.	0.40 hrs		170.00
10/16/17	GMT	Edits/comments to draft joint motion	0.20 hrs		99.00
10/16/17	GMT	Review and edits to draft notice documents (.6 hr); phone conference with co-counsel and opposing counsel (.4 hr)	1.00 hrs		495.00
10/16/17	SKJ	Conference call with Mr. Eric Gibbs, Mr. David Stein, and Mr. Mark Troutman regarding: status of settlement activities.	0.50 hrs		200.00
10/16/17	SKJ	Call to the Court and follow-up from the Court.	0.10 hrs		40.00
10/16/17	SKJ	Review five notices/letters and make suggested edits in redlined drafts.	1.00 hrs		400.00
10/16/17	SKJ	Exchange emails with Mr. Mark Troutman, revise and edit joint motion to continue, and draft and send proposed order.	0.30 hrs		120.00
10/16/17	SKJ	Subsequent calls with counsel regarding joint motion to continue.	0.20 hrs		80.00
10/19/17	MHT	Review/strategy re content of joint status report for Judge Watson.	0.20 hrs		85.00
10/19/17	MHT	Drafted, edit, and plan re joint status report for Court (due by 10/20/17 @ noon).	0.50 hrs		212.50
10/19/17	MHT	Strategy/review re issues re client approval of settlement.	0.30 hrs		127.50
10/19/17	MHT	Email w/ Honda's counsel re draft joint report for Court.	0.10 hrs		42.50
10/19/17	SKJ	Review and edit draft Joint Status Report.	0.20 hrs		80.00

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10/20/17	MHT	Finalized and filed joint status report per Judge's Order. Sent email to Judge Watson re attendees for Monday's status conference call.	0.20 hrs 85.00
10/20/17	MHT	Drafted, edited, and sent email to Court per Court Order re status conference on Monday.	0.20 hrs 85.00
10/23/17	MHT	T/c w/ Mr. Gibbs and Mr. Stein re further discussions w/ other Plaintiffs' lawyers in case and issues w/ organizing information for Plaintiffs' attorney's fee demand.	0.20 hrs 85.00
10/23/17	MHT	Prep and telephone conference w/ Judge Watson re case update.	0.30 hrs 127.50
10/24/17	MHT	Initial review/assessment of tasks to organize attorney's fees into categories to assist w/ negotiations.	0.20 hrs 85.00
10/25/17	MHT	Review and organization of attorney's fees for presentation to Honda for fee negotiations.	3.90 hrs 1,657.50
10/25/17	MHT	Correspond w/ all counsel re issues w/ add'l Plaintiffs' counsel and settlement agreement.	0.10 hrs 42.50
10/25/17	MHT	Direction to accounting staff re assistance w/ billing analysis.	0.30 hrs 127.50
10/25/17	SKJ	Review attorney's fees for presentation to opposing counsel and discuss with Mr. Mark Troutman.	0.60 hrs 240.00
10/26/17	MHT	Met w/ and direction to accounting staff re time review for negotiations w/ Honda on attorney's fees and costs.	0.20 hrs 85.00
10/26/17	MHT	Finalized calculations and forwarded them to Mr. Gibbs and Mr. Stein for use w/ attorney's fees and cost demand.	0.40 hrs 170.00
10/26/17	MHT	Review/coordination re add'l attorneys' time and expenses to educate negotiations w/ Honda re attorney's fees and costs.	0.30 hrs 127.50
10/27/17	MHT	Reviewed/summarized Chicago counsel's bills with statistics to consider as part of lodestar.	2.20 hrs 935.00
10/27/17	MHT	Review and evaluation of authority to support attorney's fees and cost negotiations.	0.30 hrs 127.50
10/30/17	MHT	Research/evaluation re strategy for attorney fee and cost litigation.	0.40 hrs 170.00
10/30/17	MHT	Coordination/planning re initial attorney's fees and cost demand.	0.20 hrs 85.00
10/30/17	MHT	Prep/t/c w/ co-counsel to advance settlement	0.70 hrs 297.50

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		issues and final settlement agreement.	
10/30/17	MHT	Began review/analysis of spreadsheet re Plaintiffs' counsels' lodestar calculations for negotiations.	0.20 hrs 85.00
10/30/17	SKJ	Conference call with Mr. Eric Gibbs, Mr. David Stein, and Mr. Mark Troutman regarding fee application and negotiation.	0.80 hrs 320.00
10/31/17	MHT	Began review/organization of table to provide Honda w/ initial fee demand.	1.80 hrs 765.00
10/31/17	MHT	Review/email Mr. Gibbs and Mr. Stein re statistics on attorney's fees negotiation.	0.20 hrs 85.00
10/31/17	SKJ	Review attorney's fees breakdown, make suggested edits, and return to Mr. Mark Troutman.	0.20 hrs 80.00
11/01/17	MHT	Research/evaluation of appropriate initial fee demand, incl. add'l calculations.	0.80 hrs 340.00
11/01/17	MHT	Planned, reviewed, and draft joint status update for Court due on 11/3/17 per Order.	0.30 hrs 127.50
11/01/17	MHT	Email and discuss initial fee demand w/ Mr. Gibbs and team.	0.10 hrs 42.50
11/01/17	MHT	T/cs w/ Mr. Gibbs re planning and evaluation for dealing with other Plaintiffs' counsel and fee and cost negotiations.	0.60 hrs 255.00
11/02/17	MHT	Strategy and edits to joint status report based upon Honda's continued failure to return edits on notices with settlement agreement.	0.30 hrs 127.50
11/02/17	MHT	T/cs and emails w/ Mr. Gibbs and Mr. Stein re add'l drafting for joint status report due 11/3/17.	0.50 hrs 212.50
11/02/17	MHT	Edited joint status report due on 11/3/17 for presentation to Honda's counsel (my edits and edits via email w/ co-counsel).	0.50 hrs 212.50
11/02/17	MHT	Email w/ Honda's counsel re draft joint status report.	0.10 hrs 42.50
11/02/17	MHT	Plan and evaluate add'l issues for status conference on 11/3/17.	0.20 hrs 85.00
11/02/17	MHT	Reviewed and planned re correspondence to Honda re attorney's fee demand.	0.10 hrs 42.50
11/02/17	SKJ	Exchange multiple emails (.4) re:, discuss with Mr. Mark Troutman (.4), and proofread (.3) joint status report.	1.10 hrs 440.00



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11/03/17	MHT	Emailed Judge Watson per Court Order (ECF No. 90) with Monday's status conference attendees.	0.10 hrs 42.50
11/03/17	MHT	Finalized negotiations w/ Honda over joint status report for Judge Watson.	0.30 hrs 127.50
11/03/17	MHT	Finalized joint status report and filed w/ Court.	0.20 hrs 85.00
11/03/17	MHT	T/c w/ Dave Stein re final edits to settlement notices and related documents.	0.20 hrs 85.00
11/03/17	MHT	Reviewed Honda's further edits to notices re settlement agreement.	0.80 hrs 340.00
11/06/17	MHT	Prep for call w/ Judge and coordinate w/ Ms. Zeman.	0.30 hrs 127.50
11/06/17	MHT	Email w/ all counsel to distribute Court's call-in information.	0.10 hrs 42.50
11/06/17	MHT	Attended telephone status conference w/ Judge Watson and parties.	0.10 hrs 42.50
11/06/17	SKJ	Prepare for (.3) and participate in conference call (.1).	0.30 hrs 120.00
11/08/17	MHT	Prep and t/c w/ Mr. McMorrow re update on case.	0.20 hrs 85.00
11/08/17	MHT	T/cs w/ Mr. Gibbs and Mr. Stein re settlement issues.	0.70 hrs 297.50
11/10/17	MHT	Reviewed settlement agreement re outstanding documents to negotiate w/ Honda.	0.30 hrs 127.50
11/10/17	MHT	Planned and drafted correspondence to Honda re deadline for finalizing documents to get preliminary approval papers filed by December 7th.	0.20 hrs 85.00
11/14/17	MHT	Strategy and review of updated settlement agreement with edits.	0.20 hrs 85.00
11/16/17	MHT	Drafted updated joint status report for Judge.	0.50 hrs 212.50
11/16/17	MHT	Prep re issues for Judge Watson in Monday's status conference.	0.20 hrs 85.00
11/17/17	MHT	Email and coordination w/ co-counsel and Honda's counsel re joint status report and Monday's status conference w/ Judge.	0.50 hrs 212.50
11/17/17	MHT	Prep/planning for status conference w/ Judge on 11/20/17.	0.30 hrs 127.50
11/17/17	SKJ	Review multiple exchanges regarding status report to the court.	0.30 hrs 120.00



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11/20/17	MHT	Planning and coordination re status conference w/ Court today.	0.40 hrs		170.00
11/20/17	SKJ	Pre-Status conference call with co-counsel.	0.40 hrs		160.00
11/20/17	SKJ	Status conference call with the Court.	0.10 hrs		40.00
11/20/17	SKJ	Post-conference call.	0.10 hrs		40.00
11/27/17	MHT	Initial receipt and review of edits to settlement document from Ms. Kiser.	0.30 hrs		127.50
11/27/17	SKJ	Review emails regarding: settlement documents, including changes by Mr. Liv Kiser.	0.20 hrs		80.00
11/28/17	MHT	Reviewed comparison documents re settlement, incl. settlement agreement and related exhibits.	0.70 hrs		297.50
11/28/17	SKJ	Review emails regarding Honda's revision to settlement documents.	0.10 hrs		40.00
11/30/17	MHT	Add'l review of settlement documents w/ edits from Ms. Kiser and Mr. Stein.	0.30 hrs		127.50
12/03/17	MHT	Planning and coordination re 12/7/17 in-person hearing.	0.20 hrs		85.00
12/04/17	MHT	Prep and coordination re efforts to finalize settlement papers before conference on 12/7/17.	0.30 hrs		127.50
12/04/17	SKJ	Call with co-counsel re: Thursday conference with the Court and lack of response from Honda.	0.30 hrs		120.00
12/05/17	MHT	Reviewed, edited, and coordinated re Winkler declaration and settlement documents w/ co-counsel.	0.40 hrs		170.00
12/06/17	MHT	T/c w/ Ms. Kiser and Honda's counsel re coordination of settlement papers for Court.	0.30 hrs		127.50
12/06/17	MHT	Coordination w/ Mr. Stein re calls w/ Honda and Court re preliminary approval papers.	0.20 hrs		85.00
12/06/17	MHT	T/c w/ Court re status of preliminary approval papers.	0.30 hrs		127.50
12/06/17	SKJ	Prepare for and participate in conference call re: progress/status of settlement.	0.50 hrs		200.00
12/11/17	MHT	Receipt and review of purported final version of Winkel Declaration re settlement.	0.20 hrs		85.00
12/12/17	BL	Bi-monthly reporting.	0.50 hrs		67.50
12/13/17	MHT	Coordination re add'l review and finalization of	0.20 hrs		85.00

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		settlement-related documents.	
12/19/17	GMT	Phone call with Eric Gibbs and David Stein re settlement documents	0.30 hrs 148.50
12/19/17	SKJ	Conference call re: settlement negotiations and court deadlines.	0.30 hrs 120.00
12/20/17	MHT	Review/plan re issues for mediation (availability and prep beforehand).	0.20 hrs 85.00
12/21/17	MHT	Began high level review of updated case law in Ohio federal courts re attorney fee dispute.	0.40 hrs 170.00
12/22/17	MHT	T/c w/ Mr. Gibbs re status of settlement discussions.	0.20 hrs 85.00
12/22/17	MHT	Receipt and review of Honda's add'l changes to settlement documents.	0.20 hrs 85.00
12/22/17	MHT	T/c w/ Mr. Stein re add'l settlement issues.	0.20 hrs 85.00
12/27/17	MHT	Responded to putative class member's inquiry on settlement and litigation.	0.10 hrs 42.50
12/28/17	MHT	Reviewed updated status of settlement documents to update Court.	0.30 hrs 127.50
12/28/17	SKJ	Discuss status of receipt of information from Honda and timetable for providing update to the Court with Mr. Mark Troutman.	0.20 hrs 80.00
01/02/18	MHT	Advancing final review/progress w/ settlement papers.	0.20 hrs 85.00
01/02/18	MHT	Prep/email w/ Honda's counsel re update to Court and outstanding issues.	0.20 hrs 85.00
01/03/18	MHT	Planning and email w/ Honda's counsel re call to Court and mediation dates.	0.20 hrs 85.00
01/04/18	MHT	Email w/ Ms. Kiser re issues w/ settlement agreement, mediation, and update to Court.	0.10 hrs 42.50
01/04/18	MHT	T/c w/ Mr. Stein re settlement negotiations and email w/ Ms. Kiser re status.	0.10 hrs 42.50
01/04/18	MHT	Reviewed status of settlement negotiations for update to Court.	0.20 hrs 85.00
01/05/18	MHT	Email and coordination w/ Ms. Kiser re update to Court.	0.10 hrs 42.50
01/05/18	MHT	T/c w/ Mr. Stein re finalizing settlement agreement and confirming with Court.	0.20 hrs 85.00
01/05/18	MHT	Email w/ Ms. Kiser re coordination for call to Judge's Chambers re status.	0.10 hrs 42.50

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01/05/18	MHT	T/c w/ Judge's law clerk re update on status of settlement.	0.10 hrs 42.50
01/05/18	MHT	T/c w/ Ms. Kiser re coordination and planning for update to Court.	0.20 hrs 85.00
01/09/18	MHT	Reviewed and evaluated final Winkel declaration w/ exhibits.	0.20 hrs 85.00
01/11/18	MHT	Work to advance settlement filing with Court.	0.20 hrs 85.00
01/11/18	MHT	Emails and coordination re fee mediation.	0.20 hrs 85.00
01/11/18	MHT	Confirmed mediation via email w/ Frank Ray.	0.10 hrs 42.50
01/12/18	MHT	Receipt and review of mediation engagement from Frank Ray.	0.20 hrs 85.00
01/15/18	MHT	Email w/ co-counsel to coordinate signatures on settlement agreement and finalizing for preliminary approval papers.	0.20 hrs 85.00
01/15/18	MHT	Email w/ Plaintiff Prychitko re final version of settlement agreement.	0.10 hrs 42.50
01/18/18	MHT	Review/evaluate add'l work need to finalize settlement and file with Court for preliminary approval.	0.20 hrs 85.00
01/18/18	MHT	Reviewed and edited preliminary approval motion re updates since last review.	0.40 hrs 170.00
01/19/18	MHT	Final review/edits re preliminary approval papers for email to Mr. Stein.	0.20 hrs 85.00
01/19/18	SKJ	Review email from Ms. Caroline Corbitt regarding obtaining client signature and review response from Mr. Mark Troutman.	0.10 hrs 40.00
01/19/18	SKJ	Review preliminary approval paper, mark suggested edits, and send redlined version to Mr. David Stein.	0.40 hrs 160.00
01/20/18	MHT	Email w/ Mr. Prychitko re questions w/ final execution of settlement agreement.	0.10 hrs 42.50
01/22/18	MHT	Reviewed settlement-related issues re preliminary approval motion.	0.10 hrs 42.50
01/22/18	MHT	Review/prepare re fee and expense mediation.	0.20 hrs 85.00
01/23/18	MHT	Cont'd high level prep and evaluation of issues for fee and cost mediation w/ Mr. Ray.	0.20 hrs 85.00
01/25/18	MHT	Reviewed remaining issues w/ filing for preliminary approval.	0.60 hrs 255.00
01/25/18	MHT	Reviewed authority re class certification for	0.40 hrs 170.00

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		settlement purposes only.	
01/25/18	MHT	T/c w/ Mr. Stein re finalization of settlement for Court.	0.20 hrs 85.00
01/25/18	MHT	Efforts to advance signatures of interested parties, counsel, and clients.	0.20 hrs 85.00
01/25/18	MHT	Began initial outline of draft mediation statement for fee and cost mediation w/ Mr. Ray.	0.20 hrs 85.00
01/25/18	SKJ	Meet with Mr. Mark Troutman regarding status of paper/signatures and engage in conference call with Mr. David Stein regarding same.	0.50 hrs 200.00
01/25/18	SKJ	Discuss mediation position statement drafting with Mr. Mark Troutman and review follow-up email from Mr. Troutman.	0.10 hrs 40.00
01/26/18	MHT	Began draft of mediation statement for Mr. Ray due on 2/1/18.	0.60 hrs 255.00
01/26/18	MHT	Review/analyze data to begin preparation of mediation statement for Mr. Ray re attorney's fees and costs mediation.	0.00 hrs N/C
01/29/18	MHT	Cont'd prep for mediation on 2/8/18.	0.20 hrs 85.00
01/29/18	MHT	Researched relevant attorney fee jurisprudence.	0.40 hrs 170.00
01/30/18	MHT	Cont'd draft of mediation statement for mediation on 2/8/18, incl. add'l analysis of lodestar and expense issues.	1.40 hrs 595.00
01/30/18	SKJ	Review draft mediation statement and make suggested edits.	0.30 hrs 120.00
01/31/18	MHT	Next to final edits to mediation statement for Frank Ray mediation on 2/8/18.	0.20 hrs 85.00
02/01/18	MHT	Review, edit, and finalize mediation statement for 2/8/18 mediation.	1.20 hrs 510.00
02/01/18	MHT	T/c w/ Court to update re settlement status.	0.20 hrs 85.00
02/01/18	MHT	Email coordination w/ co-counsel and Honda's counsel re mediation.	0.20 hrs 85.00
02/01/18	MHT	Final coordination and email of mediation statement to Mr. Ray and all counsel.	0.10 hrs 42.50
02/01/18	SKJ	Call to law clerk Ms. Caitlin Miller re: case update and status of preliminary papers.	0.10 hrs 40.00
02/04/18	MHT	Reviewed and evaluated Honda's mediation statement for 2/8/18.	0.50 hrs 212.50

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02/06/18	MHT	Began planning/coordination for fee and cost mediation.	0.40 hrs 170.00
02/07/18	MHT	Cont'd planning and review for fee and cost mediation.	0.20 hrs 85.00
02/08/18	MHT	Further research/preparation for mediation, incl. review of statements, research, and meeting w/ co-counsel re strategy.	3.90 hrs 1,657.50
02/08/18	MHT	Attended mediation conference w/ mediator Frank Ray and Honda re attorney's fees and costs.	5.00 hrs 2,125.00
02/08/18	GMT	Preparation for mediation (2.5 hr); mediation with Honda (5 hr)	7.50 hrs 3,712.50
02/08/18	SKJ	Update and plan with Mr. Mark Troutman on mediation proceedings.	0.40 hrs 160.00
02/08/18	SKJ	Discuss Magistrate Judge Deavers with co-counsel for mediation strategy.	0.10 hrs 40.00
02/08/18	SKJ	Review email from Mr. Mark Troutman and send response email regarding fee applications.	0.30 hrs 120.00
02/11/18	MHT	Reviewed remaining issues for filing preliminary approval motion.	0.20 hrs 85.00
02/12/18	MHT	Overview and direction re updated fee and cost report per protocol.	0.20 hrs 85.00
02/13/18	BL	Bi-monthly reporting.	0.50 hrs 67.50
02/14/18	MHT	Consideration and evaluation of potential benefit in re-engaging w/ mediator Frank Ray after his email offer.	0.20 hrs 85.00
02/15/18	MHT	Research/consideration re offer from Mr. Ray to resume mediation.	0.30 hrs 127.50
02/15/18	MHT	T/c w/ Lead Counsel re further mediation and case update information.	0.30 hrs 127.50
02/15/18	SKJ	Prepare and engage in strategy conference call with co-counsel Mr. Eric Gibbs re: mediation proposal.	0.50 hrs 200.00
02/15/18	SKJ	Engage in strategy discussion with Mr. Greg Travaglio and Mr. Mark Troutman re: mediation proposal.	0.50 hrs 200.00
02/16/18	MHT	Reviewed add'l fee jurisprudence in S.D. Ohio and other Ohio federal courts to advise re negotiations.	0.20 hrs 85.00
02/16/18	GMT	Emails with Eric Gibbs and Mark Troutman and Shawn Judge	0.20 hrs 99.00

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02/18/18	GMT	Emails to Frank Ray regarding mediation and decline further mediation sessions.	0.10 hrs	49.50
02/20/18	MHT	Reviewed remaining tasks necessary to get preliminary approval papers on file.	0.20 hrs	85.00
02/20/18	SKJ	Meet with Mr. Greg Travalio and Mr. Mark Troutman regarding case status and response to mediation.	0.10 hrs	40.00
03/02/18	MHT	Planning and strategy re advance settlement to file before Judge Watson.	0.20 hrs	85.00
03/05/18	MHT	T/cs w/ Mr. Gibbs and Mr. Stein re planning and strategy after six Plaintiffs' refusal to sign settlement.	0.40 hrs	170.00
03/05/18	MHT	Research/evaluate options for dealing w/ case due to Chicago lawyers' clients' non-participation in settlement.	0.30 hrs	127.50
03/05/18	SKJ	Discuss status and court update with Mr. Mark Troutman	0.20 hrs	80.00
03/06/18	MHT	Further planning and evaluation of edits to preliminary approval motion based upon six Plaintiffs' concerns w/ signing settlement agreement.	0.30 hrs	127.50
03/06/18	GMT	Conference with Mark Troutman re strategy for non-approving plaintiffs	0.20 hrs	99.00
03/09/18	MHT	Planning/evaluation of options to inform Judge Watson re six holdout Plaintiffs and potential suggestions for handling.	0.20 hrs	85.00
03/14/18	MHT	T/c w/ putative class member Terry McIntire re his questions on still-affected class vehicle.	0.30 hrs	127.50
03/14/18	MHT	Planning and evaluation of options for putative class members still facing vibration issues.	0.20 hrs	85.00
03/16/18	MHT	Reviewed authority in the event of disputed fee before Judge Watson and status where mediation was left.	0.30 hrs	127.50
03/19/18	MHT	Planning re final steps necessary before filing for preliminary approval.	0.10 hrs	42.50
03/22/18	MHT	Planning and coordination with co-counsel re means to move preliminary approval briefing along.	0.20 hrs	85.00
03/22/18	MHT	Review and research re effect of Chicago lawyers' plaintiffs on case.	0.20 hrs	85.00
03/23/18	MHT	Further planning/review re issues w/	0.20 hrs	85.00

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		preliminary approval papers based upon Honda's delay.		
04/02/18	MHT	Review/plan re next steps based upon Honda's not getting back to us on preliminary approval papers.	0.20 hrs	85.00
04/04/18	MHT	Edited preliminary approval motion after Mr. Stein's edits and emailed w/ Mr. Stein re working with Honda to get motion on file.	0.20 hrs	85.00
04/06/18	MHT	Call from Judge's law clerk re inquiry on case status.	0.20 hrs	85.00
04/06/18	MHT	Email w/ all counsel re Judge's law clerk's inquiry on case status.	0.10 hrs	42.50
04/06/18	MHT	Call w/ Mr. Gibbs re case status and preliminary approval issues.	0.20 hrs	85.00
04/06/18	SKJ	Discuss call from law clerk with Mr. Mark Troutman and review related emails.	0.50 hrs	200.00
04/09/18	MHT	Reviewed preliminary approval papers for changes based upon current case status.	0.20 hrs	85.00
04/10/18	MHT	Reviewed/planning re review by Court of preliminary approval papers and subsequent presentations/hearings.	0.20 hrs	85.00
04/10/18	BL	Bi-monthly reporting.	0.50 hrs	67.50
04/12/18	MHT	Reviewed and forwarded updated time and expense protocol per co-leads.	0.20 hrs	85.00
04/13/18	MHT	Reviewed redline from Honda w/ Mr. Stein's edits on preliminary approval papers (incl. email on comments and Court).	0.50 hrs	212.50
04/13/18	GMT	Review and comments/edits to Motion for Preliminary Approval	0.70 hrs	346.50
04/23/18	MHT	Prepare and call with Judge Watson re status of case and preliminary approval papers, incl. review of future work (no substance or exparte).	0.30 hrs	127.50
04/23/18	MHT	T/c w/ Mr. Gibbs re planning and strategy re final efforts at negotiations and preliminary approval issues.	0.20 hrs	85.00
04/23/18	SKJ	Meet with Mr. Mark Troutman re filing/status of preliminary approval papers	0.10 hrs	40.00
04/23/18	SKJ	Call with Judge Watson re status of preliminary approval papers	0.10 hrs	40.00
04/24/18	MHT	Reviewed, edited, and emailed Lead Counsel re	0.50 hrs	212.50



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		Honda's proposed changes to preliminary approval motion send on 4/23/18 (incl. time researching timing of TSBs relevant to proposed changes).	
04/24/18	MHT	Planning re issues w/ likely fee dispute before Judge Watson.	0.40 hrs 170.00
04/24/18	MHT	T/c w/ Eric Gibbs and Dave Stein re preliminary approval issues and getting papers on file with Court.	0.30 hrs 127.50
04/24/18	MHT	Final review and edits to settlement-related filings per Mr. Stein's request.	0.10 hrs 42.50
04/24/18	MHT	Reviewed, edited, and commented on final edits to preliminary approval motion, proposed preliminary approval order, and Gibbs Declaration per request of Mr. Stein.	0.70 hrs 297.50
04/24/18	SKJ	Discuss preliminary approval paper language with Mr. Mark Troutman (.2); have conference call with Mr. Eric Gibbs (.3)	0.50 hrs 200.00
04/25/18	SKJ	Review emails re settlement papers	0.20 hrs 80.00
04/26/18	MHT	Respond to email inquiry from Plaintiff Prychitko re timing of settlement approval.	0.10 hrs 42.50
04/27/18	MHT	Cont'd efforts and review to prepare settlement for approval w/ Judge Watson.	0.30 hrs 127.50
04/28/18	MHT	Email update w/ Plaintiff Prychitko re filing of preliminary approval papers per his request.	0.10 hrs 42.50
04/30/18	MHT	T/c w/ Court and report to co-counsel re add'l means to assist Court w/ preliminary approval filings.	0.20 hrs 85.00
05/01/18	MHT	Emailed updates to several class members who have corresponded or inquired about potential settlement.	0.30 hrs 127.50
05/01/18	MHT	Consideration and planning re dealing w/ Plaintiffs who have yet to approve the settlement.	0.20 hrs 85.00
05/03/18	MHT	Reviewed file re add'l steps to take during pendency of preliminary approval motion.	0.20 hrs 85.00
05/08/18	MHT	Review/prepare re potential issues to be raised by Court re preliminary approval.	0.30 hrs 127.50
05/11/18	MHT	Call from Court re inquiries re preliminary approval papers pending.	0.20 hrs 85.00
05/11/18	MHT	Updated lead counsel re inquiry from Court.	0.10 hrs 42.50



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05/11/18	MHT	Review/evaluate/plan re Judge's granting of Preliminary Approval Order.	0.30 hrs 127.50
05/21/18	MHT	Review/research to support strategy on fee negotiations w/ Honda.	0.30 hrs 127.50
05/21/18	SKJ	Review email exchange among co-counsel re: fee application.	0.10 hrs 40.00
06/04/18	MHT	Planning/consideration of issues for disputed fee application due in 7/2018.	0.30 hrs 127.50
06/04/18	MHT	Outlined list of issues to address during planning call re disputed fee application and strategy w/ Honda.	0.30 hrs 127.50
06/05/18	MHT	Prep and t/c w/ Mr. Stein re preparation and strategy re fee application and final approval process.	1.00 hrs 425.00
06/05/18	MHT	Began review/analysis of fees and expenses per call w/ Mr. Stein today.	0.60 hrs 255.00
06/05/18	SKJ	Conference call with co-counsel re: fee application process and strategy.	0.90 hrs 360.00
06/06/18	MHT	Began review of time and expenses re filing w/ Court for fee application.	0.20 hrs 85.00
06/06/18	MHT	Review/edited time and expenses for duplication and business sense before preparing fee application.	2.30 hrs 977.50
06/07/18	MHT	Further edits/review of firm time and expenses to file w/ fee application.	2.00 hrs 850.00
06/08/18	MHT	Review/forward fee and expense reports to Lead Counsel per protocol.	0.20 hrs 85.00
06/08/18	MHT	Review and planning re documents and exhibits to go with fee application due on July 10th.	0.30 hrs 127.50
06/08/18	BL	Bi-monthly reporting.	0.50 hrs 67.50
06/11/18	MHT	Reviewed and evaluated issues w/ Honda's requirement to set forth website optimization protocol by today's deadline.	0.20 hrs 85.00
06/12/18	MHT	Work w/ accounting department on finalizing bill for fee application.	0.40 hrs 170.00
06/13/18	MHT	Review/strategy re dealing w/ Honda's proposed placement of information on Owner's Link website and dealing w/ its failure to meet website optimization per Court Order.	0.40 hrs 170.00

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06/14/18	MHT	Review/analysis of add'l issues and measures Honda must perform to comply with preliminary approval order.	0.20	hrs	85.00
06/15/18	MHT	Reviewed and planned w/ Mr. Stein re how to handle Honda's missing deadline for web optimization protocol.	0.20	hrs	85.00
06/16/18	SKJ	Review time entries and make corrections/mark suggested edits and write-offs for submission to the Court as part of fee application.	1.20	hrs	480.00
06/18/18	MHT	Further review and analysis of fee and expense reports to submit w/ fee application.	0.70	hrs	297.50
06/18/18	MHT	Planning and evaluation re dealing w/ Honda's breach of settlement agreement re web optimization.	0.30	hrs	127.50
06/18/18	MHT	T/c w/ Mr. Stein re working w/ Honda re website optimization and other tasks from preliminary approval order (incl. further analysis after call).	0.50	hrs	212.50
06/18/18	SKJ	Review time entry write-offs/edits with Mr. Mark Troutman.	0.20	hrs	80.00
06/18/18	SKJ	Review website content and discuss placement issues and settlement implementation issues with Mr. Mark Troutman.	0.40	hrs	160.00
06/20/18	MHT	Review of preliminary approval language and assessment of further communications w/ Honda re compliance with website and internet issues.	0.20	hrs	85.00
06/20/18	MHT	Review, analyze, and finalize time and expense reports to send to Mr. Stein for fee application.	0.30	hrs	127.50
06/20/18	MHT	T/c w/ Mr. Stein re further issues and negotiations w/ Honda re settlement procedure.	0.40	hrs	170.00
06/21/18	MHT	Review and outline issues for final approval brief.	0.20	hrs	85.00
06/21/18	MHT	Review and outline issues and strategy for fee application w/ co-counsel in bullet point email and f/u discussion w/ co-counsel via email.	0.50	hrs	212.50
06/21/18	MHT	Began research and review re potential experts to opine on reasonableness of attorney's fees and costs.	0.20	hrs	85.00
06/21/18	GMT	Reply to Mark Troutman's email regarding outline adn issues for fee application.	0.20	hrs	99.00

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06/21/18	SKJ	Discuss fee application process and strategy with Mr. Mark Troutman, including use of expert testimony and various potential experts.	0.30 hrs 120.00
06/22/18	MHT	Research and reach out to potential experts to opine on reasonableness of attorney's fees and costs.	0.50 hrs 212.50
06/22/18	MHT	Reviewed settlement website, Owner's Link website, and other issues w/ settlement (incl. email exchange w/ Mr. Stein).	0.30 hrs 127.50
06/22/18	SKJ	Review multiple co-counsel emails discussing placement of website notices and possible reactions.	0.20 hrs 80.00
06/22/18	SKJ	Review multiple emails re: expert for attorney's fee application and discuss the same with Mr. Mark Troutman.	0.10 hrs 40.00
06/25/18	MHT	Further research/compilation of materials for proposed expert witnesses to propose to Mr. Gibbs and Mr. Stein.	0.50 hrs 212.50
06/25/18	MHT	T/c w/ co-counsel re planning for final approval and fee petition brief.	0.30 hrs 127.50
06/25/18	SKJ	Place call and leave voicemail to potential fee expert Mr. Steve Chappellear (.1). Review email from assistant, compile conflict check information, and send response email (.4).	0.50 hrs 200.00
06/26/18	MHT	Research/evaluation re compliance with settlement agreement by Honda.	0.30 hrs 127.50
06/26/18	MHT	T/c and evaluation w/ Mr. Stein re ongoing settlement details and negotiations w/ Honda.	0.20 hrs 85.00
06/26/18	MHT	Began research to assist w/ disputed fee application.	0.20 hrs 85.00
06/26/18	MHT	Further research/evaluation of potential experts re reasonableness of attorney's fees and expenses.	0.30 hrs 127.50
06/26/18	MHT	T/c w/ Mr. Stein re getting additional information from other firms re fee application.	0.20 hrs 85.00
06/26/18	GMT	Conference with Mark Troutman and Shawn Judge over finding expert on fees (.3); email to Keith Schneider (.2)	0.50 hrs 247.50
06/26/18	GMT	Emails to Keith Schneider and Eric Gibbs re fee expert	0.20 hrs 99.00
06/26/18	GMT	Conference with Mark Troutman and Shawn	0.80 hrs 396.00

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		Judge over preliminary agreement (.3); email to Keith Schneider (.2); conference with Mark Troutman and Shawn Judge over fee expert (.3)	
06/26/18	SKJ	Exchange emails with potential fee expert Mr. Steve Chappelle re: conflict.	0.10 hrs 40.00
06/26/18	SKJ	Meet with Mr. Greg Travaglio and Mr. Mark Troutman re: expert for fee application process.	0.30 hrs 120.00
06/26/18	SKJ	Meet with Mr. Greg Travaglio and Mr. Mark Troutman re: website notice and compliance with settlement terms.	0.20 hrs 80.00
06/26/18	SKJ	Conduct research and send compiled fee application cases to co-counsel.	0.70 hrs 280.00
06/27/18	MHT	Reviewed SD Ohio legal authority re disputes over attorney's fees and costs re fee application.	0.40 hrs 170.00
06/27/18	MHT	Consideration of qualifications of proposed expert on attorney's fees and costs, as well as parameters for opinion sought.	0.20 hrs 85.00
06/27/18	MHT	T/c w/ Mr. Stein re communication from VA named Plaintiff re settlement.	0.20 hrs 85.00
06/27/18	MHT	Drafted communication responding to inquiry raised by VA named Plaintiff.	0.20 hrs 85.00
06/27/18	MHT	Calls w/ other plaintiffs' lawyers and file review to advance organization for fee application.	0.60 hrs 255.00
06/27/18	MHT	T/c w/ Mike Donovan re supplemental information to evaluate in preparing fee application.	0.20 hrs 85.00
06/27/18	MHT	Reviewed and commented re proposed email to class member re current representation by counsel.	0.20 hrs 85.00
06/27/18	SKJ	Review multiple emails re: retention of fee expert Mr. Keith Schneider.	0.20 hrs 80.00
06/28/18	MHT	Outlined materials and topics for Mr. Schneider to review to evaluate reasonableness of time and expenses.	0.20 hrs 85.00
06/28/18	MHT	T/c w/ co-counsel Michael Donovan re fee application.	0.20 hrs 85.00
06/28/18	MHT	Reviewed, evaluated, and commented on time and fee application re specific attorneys' support for fees and costs.	0.30 hrs 127.50
06/28/18	MHT	Began research/evaluation re case authority re	0.20 hrs 85.00

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Iodestar multipliers (up and down) in S.D. Ohio.

06/28/18	GMT	Emails re meeting with expert	0.20 hrs	99.00
06/29/18	MHT	Planned and outlined materials for Mr. Schneider to review re opinion on reasonableness of attorney's fees and costs.	0.40 hrs	170.00
06/29/18	MHT	Work with and coordination w/ Mr. Schneider for initial phone call/meeting.	0.10 hrs	42.50
06/29/18	MHT	Reviewed time submitted from other firms for consideration with fee application.	0.80 hrs	340.00
06/29/18	MHT	Researched useful contested fee cases in S.D. Ohio for fee application.	0.30 hrs	127.50
06/29/18	SKJ	Discuss fee application/use of expert with Mr. Greg Travalio and Mr. Mark Troutman (.2). Follow-up discussion with Mr. Troutman re: review of downstream attorney fee applications (.2). Send co-counsel email re: review of fee application (.1).	0.50 hrs	200.00
06/29/18	SKJ	Review email exchanges with fee expert re: availability and scheduling.	0.10 hrs	40.00

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 \$310,694.50

<u>Summary</u>	<u>Class</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
Travalio, G.M.	Partner	113.20	495.00	56,034.00
Troutman, M H	Partner	509.80	425.00	216,665.00
Teetor, M.S.	Associate	11.20	275.00	3,080.00
Long, Becky	Paralegal	13.30	135.00	1,795.50
Judge, Shawn K	Of Counsel	82.80	400.00	33,120.00

EXPENSES

07/09/15	CLERK, U.S. DISTRICT COURT; Court fees; Complaint	400.00
09/10/15	MARK H TROUTMAN; Other; Flights for Mr. Troutman and Mr. Travalio to Newark Regarding JPML	587.40
09/30/15	MARK H TROUTMAN; Meals; Dulles - Meal During Travel 9/30/2015	8.87
09/30/15	MARK H TROUTMAN; Meals; Orale Mexican Kitchen (With Mr. Travalio) 9/30/2015	79.34
09/30/15	MARK H TROUTMAN; Meals; Pearl Street Cafe - Meal During Hearing 10/1/2015	6.91
09/30/15	MARK H TROUTMAN; Meals; Pearl Street Cafe - Meal During Hearing 10/1/2015	12.38
09/30/15	MARK H TROUTMAN; Meals; Lunch After JPML Hearing (also Mr. Travalio) 10/1/2015	77.19

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09/30/15	MARK H TROUTMAN; Meals; Food During Return Travel (also Mr. Travalio) 10/1/2015		5.76
09/30/15	MARK H TROUTMAN; Other; Parking at CMH During NYC Travel 10/1/2015		36.00
09/30/15	MARK H TROUTMAN; Other; Baggage Storage Fee During Hearing 10/1/2015		2.00
10/02/15	MARK H TROUTMAN; Other; Uber Travel to SD NY Regarding JPML Hearing 10/1/2015		80.15
10/02/15	MARK H TROUTMAN; Other; Uber Travel to Newark Airport 10/1/2015		81.38
10/02/15	MARK H TROUTMAN; Other; Hotel and Meals at Marriott for JPML Hearing 10/1/2015		395.08
10/07/15	GREGORY M. TRAVALIO; Other; Attendance at JPML Hearing in New York, Newark Airport Marriott 9/30-10/1/2015		368.45
10/16/15	PACER SERVICE CENTER; Online research		20.40
10/16/15	PACER SERVICE CENTER; Online research		2.80
01/13/16	PACER SERVICE CENTER; Online research		45.20
01/13/16	PACER SERVICE CENTER; Online research		4.60
03/03/16	MARK H TROUTMAN; Out-of-town travel; Travel to/from Roush Regarding Maticik 3/3/2016; 35 miles @ \$0.54 per mile		18.90
07/12/16	PACER SERVICE CENTER; Online research		13.60
08/17/16	MARK H TROUTMAN; Other; Airfare to LA for Resolution Meeting		456.95
09/07/16	MARK H TROUTMAN; Local travel; Mileage for Travel from Airport to Office 9/2/2016		5.40
09/07/16	MARK H TROUTMAN; Local travel; Mileage to Airport for Flight 8/31/2016		5.40
09/07/16	MARK H TROUTMAN; Meals; Lunch Before Flight to LA 8/31/2016		16.48
09/07/16	MARK H TROUTMAN; Meals; Dinner in LA 9/1/2016		31.99
09/07/16	MARK H TROUTMAN; Meals; Breakfast Before Flight to CMH 9/2/2016		11.89
09/07/16	MARK H TROUTMAN; Meals; Meal During Layover at LAS 9/2/2016		6.48
09/07/16	MARK H TROUTMAN; Other; Hotel During Travel for Honda Meeting 9/2/2016		678.34
09/07/16	MARK H TROUTMAN; Other; Wi-Fi During Return Flight for Case Work 9/2/2016		8.00
09/07/16	MARK H TROUTMAN; Other; Parking at CMH During Travel 9/2/2016		54.00
09/07/16	MARK H TROUTMAN; Other; Uber to LAX from Hotel 9/2/2016		37.36
09/07/16	MARK H TROUTMAN; Other; Taxi from LAX to Hotel 8/31/2016		63.08
09/07/16	MARK H TROUTMAN; Other; Uber from Honda Meeting to Hotel 9/1/2016		5.67

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12/02/16	PACER SERVICE CENTER; Online research		4.70
03/09/17	MARK H TROUTMAN; Out-of-town travel; Mileage re inspection of vehicle for mediation; 18 miles x .535		9.63
03/09/17	MARK H TROUTMAN; Meals; Working dinner with co-counsel during 2-day mediation		183.73
03/09/17	MARK H TROUTMAN; Meals; Lunch for co-counsel in for mediation		14.57
03/09/17	MARK H TROUTMAN; Meals; Breakfast for mediation		65.27
03/09/17	MARK H TROUTMAN; Meals; Lunch for mediation		123.12
03/09/17	MARK H TROUTMAN; Meals; Breakfast for mediation		70.30
03/09/17	MARK H TROUTMAN; Meals; Lunch for mediation		140.50
03/09/17	GREGORY M. TRAVALIO; Meals; Working Dinner with co-counsel during 2 day mediation		245.60
03/30/17	GREGORY M. TRAVALIO; Meals with co-counsel following successful mediation in case		30.80
02/15/18	MARK H TROUTMAN; Meals; Lunch and snacks during mediation		77.89
02/21/18	GREGORY M. TRAVALIO; Meals; Dinner with Mark Troutman, Shawn Judge and Eric Gibbs following mediation		194.85
06/30/18	Copying		78.00
			\$4,866.41

Total new professional services	\$310,694.50
Total new expenses incurred	\$4,866.41
	-----
Total of new charges for this invoice	\$315,560.91
	-----
<b>Total balance now due</b>	<b>\$315,560.91</b>

**EXHIBIT B**



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## Selection Criteria

Clie.Selection Slip.Type	Include: Honda CRV Time
--------------------------	-------------------------

Slip ID Dates and Time Status Description	Timekeeper Activity Client	Units	Rate	Slip Value
<u>Timekeeper: CCK</u>				
55582 1/25/2016 WIP	TIME CCK Factual Invest. Honda CRV	3:00:00	\$265.00	\$795.00
Retrieve and review Honda <b>CRV</b> Warranty Booklet, send to <b>MDD</b>				
Total: 1/25/2016				
	Billable	3.00		\$795.00
	Unbillable	0.00		\$0.00
	Total	3.00		\$795.00
55584 2/3/2016 WIP	TIME CCK Pleading/Brief Honda CRV	4:48:00	\$265.00	\$1,272.00
Review <b>Gibbs</b> Class Action Complaint and craft a draft complaint for <b>MDD</b> to review				
Total: 2/3/2016				
	Billable	4.80		\$1,272.00
	Unbillable	0.00		\$0.00
	Total	4.80		\$1,272.00
55585 2/4/2016 WIP	TIME CCK Pleading/Brief Honda CRV	4:00:00	\$265.00	\$1,060.00
Work on Class Action Complaint				
Total: 2/4/2016				
	Billable	4.00		\$1,060.00
	Unbillable	0.00		\$0.00
	Total	4.00		\$1,060.00

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Slip ID	Dates and Time	Timekeeper	Activity	Client	Units	Rate	Slip Value
55586	TIME	CCK	Pleading/Brief	Honda CRV	5:00:00	\$265.00	\$1,325.00
	2/8/2016						
	WIP						
	Work on Class Action Complaint						
55587	TIME	CCK	Pleading/Brief	Honda CRV	5:00:00	\$265.00	\$1,325.00
	2/8/2016						
	WIP						
	Work on Class Action Complaint						
Total: 2/8/2016							
		Billable			10.00		\$2,650.00
		Unbillable			0.00		\$0.00
		Total			10.00		\$2,650.00
55588	TIME	CCK	Pleading/Brief	Honda CRV	6:00:00	\$265.00	\$1,590.00
	2/10/2016						
	WIP						
	Work on Class Action Complaint						
Total: 2/10/2016							
		Billable			6.00		\$1,590.00
		Unbillable			0.00		\$0.00
		Total			6.00		\$1,590.00
55589	TIME	CCK	Pleading/Brief	Honda CRV	5:00:00	\$265.00	\$1,325.00
	2/11/2016						
	WIP						
	Work on Class Action Complaint						
Total: 2/11/2016							
		Billable			5.00		\$1,325.00
		Unbillable			0.00		\$0.00
		Total			5.00		\$1,325.00
55590	TIME	CCK	Pleading/Brief	Honda CRV	4:00:00	\$265.00	\$1,060.00
	2/12/2016						
	WIP						
	Work on Class Action Complaint						
Total: 2/12/2016							
		Billable			4.00		\$1,060.00

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity			
Status	Client			
Description				
	Unbillable	0.00		\$0.00
	Total	4.00		\$1,060.00
55591	CCK	5:00:00	\$265.00	\$1,325.00
2/15/2016	Pleading/Brief			
WIP	Honda CRV			
Work on Class Action Complaint				
Total: 2/15/2016				
	Billable	5.00		\$1,325.00
	Unbillable	0.00		\$0.00
	Total	5.00		\$1,325.00
55592	CCK	4:30:00	\$265.00	\$1,192.50
2/16/2016	Pleading/Brief			
WIP	Honda CRV			
Work on Class Action Complaint				
Total: 2/16/2016				
	Billable	4.50		\$1,192.50
	Unbillable	0.00		\$0.00
	Total	4.50		\$1,192.50
55593	CCK	4:00:00	\$265.00	\$1,060.00
2/17/2016	Pleading/Brief			
WIP	Honda CRV			
Work on Class Action Complaint				
Total: 2/17/2016				
	Billable	4.00		\$1,060.00
	Unbillable	0.00		\$0.00
	Total	4.00		\$1,060.00
55594	CCK	4:06:00	\$265.00	\$1,086.50
7/6/2016	Experts			
WIP	Honda CRV			
Look for expert				
Total: 7/6/2016				
	Billable	4.10		\$1,086.50

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity			
Status	Client			
Description				
	Unbillable	0.00		\$0.00
	Total	4.10		\$1,086.50
55653	CCK	3:48:00	\$265.00	\$1,007.00
7/7/2016	Experts			
WIP	Honda CRV			
Look for expert				
Total: 7/7/2016				
	Billable	3.80		\$1,007.00
	Unbillable	0.00		\$0.00
	Total	3.80		\$1,007.00
55654	CCK	3:36:00	\$265.00	\$954.00
7/18/2016	Experts			
WIP	Honda CRV			
Look for expert				
Total: 7/18/2016				
	Billable	3.60		\$954.00
	Unbillable	0.00		\$0.00
	Total	3.60		\$954.00
Total: CCK				
	Billable	61.80		\$16,377.00
	Unbillable	0.00		\$0.00
	Total	61.80		\$16,377.00
<u>Timekeeper: MDD</u>				
55578	MDD	2:18:00	\$850.00	\$1,955.00
1/13/2016	Factual Invest.			
WIP	Honda CRV			
Emails/calls with Krishnan Chittur re: potential case; research into a Honda issued recall notice on Honda CRX due to too much engine vibration, specifically barring dealers from selling those model cars without fixing them. Potential client has gone to the dealer 3x who is unable to resolve the issue, Honda				
Total: 1/13/2016				
	Billable	2.30		\$1,955.00
	Unbillable	0.00		\$0.00
	Total	2.30		\$1,955.00

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Slip ID	Dates and Time	Status	Description	Timekeeper	Activity	Client	Units	Rate	Slip Value
55581	1/22/2016	WIP	TIME	MDD	Factual Invest.	Honda CRV	1:00:00	\$850.00	\$850.00
Review client documents									
55580	1/22/2016	WIP	TIME	MDD	Legal Research	Honda CRV	1:42:00	\$850.00	\$1,445.00
Research re: additional Count to reflect NY law re: it appears there is no fix for <b>this materials</b> and workmanship defect (engine mounts are of inferior materials and workmanship to dissipate vibration), so the "repair and replace" warranty will have (and has) "failed of its essential <b>purpose</b> ," within the meaning of <b>UCC</b>									
55579	1/22/2016	WIP	TIME	MDD	Legal Research	Honda CRV	0:30:00	\$850.00	\$425.00
Research re: <b>Gibbs</b> action in California filed in July 2015; review Class Action Complaint									
Total: 1/22/2016									
							Billable	3.20	\$2,720.00
							Unbillable	0.00	\$0.00
							Total	3.20	\$2,720.00
55583	1/25/2016	WIP	TIME	MDD	Factual Invest.	Honda CRV	0:30:00	\$850.00	\$425.00
Review Honda <b>CR-V</b> 2015 Warranty Booklet; sent to <b>K. Chittur</b> to verify with client they received the same one.									
Total: 1/25/2016									
							Billable	0.50	\$425.00
							Unbillable	0.00	\$0.00
							Total	0.50	\$425.00
55595	2/18/2016	WIP	TIME	MDD	Pleading/Brief	Honda CRV	4:30:00	\$850.00	\$3,825.00
Review NY complaint sent by <b>K. Chittur</b> and work on our rough draft to send out.									
Total: 2/18/2016									
							Billable	4.50	\$3,825.00

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity			
Status	Client			
Description				
	Unbillable	0.00		\$0.00
	Total	4.50		\$3,825.00
55596	MDD	3:00:00	\$850.00	\$2,550.00
2/20/2016	Pleading/Brief			
WIP	Honda CRV			
More work on Complaint, discuss with Noah Axler				
Total: 2/20/2016				
	Billable	3.00		\$2,550.00
	Unbillable	0.00		\$0.00
	Total	3.00		\$2,550.00
55597	MDD	3:00:00	\$850.00	\$2,550.00
3/2/2016	Pleading/Brief			
WIP	Honda CRV			
More work on Complaint, send Documents to Noah Axler; work on breach of express warranty claim and a failure of essential purpose of the repair and replace remedy.				
Total: 3/2/2016				
	Billable	3.00		\$2,550.00
	Unbillable	0.00		\$0.00
	Total	3.00		\$2,550.00
55600	MDD	1:00:00	\$850.00	\$850.00
3/9/2016	Pleading/Brief			
WIP	Honda CRV			
Send P.M. draft Class Action Complaint to co-counsel; emails with co-counsel re: including the on-line and NHTSA complaints				
55599	MDD	1:00:00	\$850.00	\$850.00
3/9/2016	Pleading/Brief			
WIP	Honda CRV			
Review Noah's edits and additions to Class Action Complaint				
55598	MDD	1:00:00	\$850.00	\$850.00
3/9/2016	Pleading/Brief			
WIP	Honda CRV			
Send A.M. draft Class Action Complaint to co-counsel for review; address subsequent questions: why Honda dealer is not named as a party, do we want to sue in EDNY, etc.; emails with co-counsel re: same				

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Slip ID	Dates and Time	Status	Description	Timekeeper	Activity	Client	Units	Rate	Slip Value
Total: 3/9/2016									
				Billable			3.00		\$2,550.00
				Unbillable			0.00		\$0.00
				Total			3.00		\$2,550.00
55604	3/11/2016	WIP	TIME	MDD	Pleading/Brief	Honda CRV	1:00:00	\$850.00	\$850.00
					Review <b>K. Chittur's</b> edits to Class Action Complaint				
55603	3/11/2016	WIP	TIME	MDD	Pleading/Brief	Honda CRV	0:18:00	\$850.00	\$255.00
					Read through Ohio's Second Amended Class Action Complaint; discuss <b>MDL</b> of case with co-counsel				
55602	3/11/2016	WIP	TIME	MDD	Legal Research	Honda CRV	1:00:00	\$850.00	\$850.00
					Review <b>NHTSA</b> complaints and discuss adding them to complaint with co-counsel; emails re: same				
55601	3/11/2016	WIP	TIME	MDD	Legal Research	Honda CRV	0:18:00	\$850.00	\$255.00
					Review docket entries from California case				
Total: 3/11/2016									
				Billable			2.60		\$2,210.00
				Unbillable			0.00		\$0.00
				Total			2.60		\$2,210.00
55605	3/16/2016	WIP	TIME	MDD	Pleading/Brief	Honda CRV	1:00:00	\$850.00	\$850.00
					Continue work on Class Action Complaint and emails with co-counsel re: same				
55606	3/16/2016	WIP	TIME	MDD	Pleading/Brief	Honda CRV	1:00:00	\$850.00	\$850.00
					<b>Finalize</b> and send Class Action Complaint to <b>K. Chittur</b> for filing				

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Slip ID	Dates and Time	Status	Description	Timekeeper	Activity	Client	Units	Rate	Slip Value
Total: 3/16/2016									
				Billable			2.00		\$1,700.00
				Unbillable			0.00		\$0.00
				Total			2.00		\$1,700.00
55608	3/21/2016	WIP	TIME	MDD	Tele w/to	Honda CRV	0:12:00	\$850.00	\$170.00
					Telephone call to Eric Gibbs re: case				
55607	3/21/2016	WIP	TIME	MDD	Pleading/Brief	Honda CRV	0:18:00	\$850.00	\$255.00
					Review last minute changes to Class Action Complaint by K. Chittur				
Total: 3/21/2016									
				Billable			0.50		\$425.00
				Unbillable			0.00		\$0.00
				Total			0.50		\$425.00
55609	3/22/2016	WIP	TIME	MDD	Pleading/Brief	Honda CRV	0:18:00	\$850.00	\$255.00
					Review our as-filed Class Action Complaint and send to attorneys at Sidley and Eric Gibbs				
55610	3/22/2016	WIP	TIME	MDD	Correspondence	Honda CRV	0:12:00	\$850.00	\$170.00
					Email from James Wilson at Vorys stating they are unable to accept service of process; send to defendants registered agent				
Total: 3/22/2016									
				Billable			0.50		\$425.00
				Unbillable			0.00		\$0.00
				Total			0.50		\$425.00
55611	3/24/2016	WIP	TIME	MDD	Case Mgmt/Strat	Honda CRV	0:18:00	\$850.00	\$255.00
					Emails with co-counsel re: service of process to registered agent in NY, CT Corporation				



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Slip ID	Dates and Time	Status	Description	Timekeeper	Activity	Client	Units	Rate	Slip Value
Total: 3/24/2016									
				Billable			0.30		\$255.00
				Unbillable			0.00		\$0.00
				Total			0.30		\$255.00
55612	TIME			MDD			0:36:00	\$850.00	\$510.00
4/4/2016				Correspondence					
WIP				Honda CRV					
Emails with potential class members									
Total: 4/4/2016									
				Billable			0.60		\$510.00
				Unbillable			0.00		\$0.00
				Total			0.60		\$510.00
55613	TIME			MDD			1:48:00	\$850.00	\$1,530.00
4/19/2016				Pleading/Brief					
WIP				Honda CRV					
Stipulation of transfer to the MDL and emails with co-counsel re: same and further work on MDL									
Total: 4/19/2016									
				Billable			1.80		\$1,530.00
				Unbillable			0.00		\$0.00
				Total			1.80		\$1,530.00
55614	TIME			MDD			0:06:00	\$850.00	\$85.00
4/21/2016				Pleading/Brief					
WIP				Honda CRV					
Review Affidavit of Service we filed									
Total: 4/21/2016									
				Billable			0.10		\$85.00
				Unbillable			0.00		\$0.00
				Total			0.10		\$85.00
55616	TIME			MDD			0:18:00	\$850.00	\$255.00
5/2/2016				Correspondence					
WIP				Honda CRV					

Send a copy of the JPML stamped Tag Along Action to K. Chittur for filing in EDNY

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Slip ID	Dates and Time	Status	Description	Timekeeper	Activity	Client	Units	Rate	Slip Value	
55615	5/2/2016	WIP	TIME	MDD	Pleading/Brief	Honda CRV	1:06:00	\$850.00	\$935.00	
Create a Notice of Tag Along Action with the <b>JPML</b> and file										
Total: 5/2/2016										
				Billable			1.40		\$1,190.00	
				Unbillable			0.00		\$0.00	
				Total			1.40		\$1,190.00	
55618	5/4/2016	WIP	TIME	MDD	Pleading/Brief	Honda CRV	1:42:00	\$850.00	\$1,445.00	
Prepare and file Notice of Appearance in <b>EDNY</b> ; review filings: Letter advising of filing Notice of Tag-Along Action and Request to Take In-Chambers Conference Off Calendar, Letter MOTION to Adjourn Conference,										
55617	5/4/2016	WIP	TIME	MDD	Pleading/Brief	Honda CRV	0:24:00	\$850.00	\$340.00	
Review Judge <b>Cogan's</b> rules										
Total: 5/4/2016										
				Billable			2.10		\$1,785.00	
				Unbillable			0.00		\$0.00	
				Total			2.10		\$1,785.00	
55619	5/6/2016	WIP	TIME	MDD	Pleading/Brief	Honda CRV	0:30:00	\$850.00	\$425.00	
Review Conditional Transfer Order filed in <b>MDL</b> , Notice of Filing <b>CTO</b> and Publication of Briefing Schedule; emails with co-counsel re: same										
55620	5/6/2016	WIP	TIME	MDD	Pleading/Brief	Honda CRV	0:30:00	\$850.00	\$425.00	
Review the various Transfer Orders, Case Transfers and scheduled Conference call with Court										
Total: 5/6/2016										
				Billable			1.00		\$850.00	

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Slip ID	Dates and Time	Status	Description	Timekeeper	Activity	Client	Units	Rate	Slip Value
					Unbillable		0.00		\$0.00
					Total		1.00		\$850.00
55621	6/2/2016	WIP	TIME	MDD	Pleading/Brief	Honda CRV	1:00:00	\$850.00	\$850.00
Review the Response in Opposition to the Motion to Dismiss Certain Counts in Plaintiffs Second Consolidated Amended Complaint									
Total: 6/2/2016									
					Billable		1.00		\$850.00
					Unbillable		0.00		\$0.00
					Total		1.00		\$850.00
55622	6/3/2016	WIP	TIME	MDD	Pleading/Brief	Honda CRV	2:00:00	\$850.00	\$1,700.00
Review the Motion to Compel Arbitration									
55623	6/3/2016	WIP	TIME	MDD	Legal Research	Honda CRV	2:00:00	\$850.00	\$1,700.00
Research re: <u>Class Waiver Under Attack on Another Front</u> by David Seligman from the NCLC Digital Libray; emails with co-counsel re: key article about the conflict between FAA Arbitration and the Magnuson-Moss Act, which must be referenced in the opposition to the Motion to Stay and Compel arbitration in									
Total: 6/3/2016									
					Billable		4.00		\$3,400.00
					Unbillable		0.00		\$0.00
					Total		4.00		\$3,400.00
55624	6/6/2016	WIP	TIME	MDD	Pleading/Brief	Honda CRV	1:00:00	\$850.00	\$850.00
Review filings: Minute Entry for proceedings held before Judge Michael H. Watson and Magistrate Judge Elizabeth Preston Deavers: Telephone Conference held on 6/3/2016 and the Notice of Voluntary Dismissal by Plaintiffs Margaret Ward, Troy Ward									
Total: 6/6/2016									
					Billable		1.00		\$850.00

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity			
Status	Client			
Description				
	Unbillable	0.00		\$0.00
	Total	1.00		\$850.00
55625	MDD	1:00:00	\$850.00	\$850.00
6/7/2016	Pleading/Brief			
WIP	Honda CRV			
Review Pretrial Order No. 8: Order Memorializing June 3, 2016 Telephone Conference. Status Conference set for 7/6/2016				
Total: 6/7/2016				
	Billable	1.00		\$850.00
	Unbillable	0.00		\$0.00
	Total	1.00		\$850.00
55626	MDD	0:18:00	\$850.00	\$255.00
6/23/2016	Pleading/Brief			
WIP	Honda CRV			
Review Motion for Extension of Time and subsequent Order granting such				
Total: 6/23/2016				
	Billable	0.30		\$255.00
	Unbillable	0.00		\$0.00
	Total	0.30		\$255.00
55627	MDD	0:12:00	\$850.00	\$170.00
6/28/2016	Pleading/Brief			
WIP	Honda CRV			
Review the Notice of Voluntary Dismissal by Plaintiff <b>Ashleyn Payan</b>				
Total: 6/28/2016				
	Billable	0.20		\$170.00
	Unbillable	0.00		\$0.00
	Total	0.20		\$170.00
55628	MDD	0:42:00	\$850.00	\$595.00
6/30/2016	Tele w/to			
WIP	Honda CRV			
Telephone call with Eric <b>Gibbs</b> about going forward on the case, specifically finding a Noise Vibration Harshness expert; review timekeeping protocol				
Total: 6/30/2016				
	Billable	0.70		\$595.00

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity			
Status	Client			
Description				
	Unbillable	0.00		\$0.00
	Total	0.70		\$595.00
55629	MDD	0:18:00	\$850.00	\$255.00
7/1/2016	Pleading/Brief			
WIP	Honda CRV			
Review Notice by Defendants American Honda Motor Co, Inc of Filing Joint Agenda for Status Conference				
Total: 7/1/2016				
	Billable	0.30		\$255.00
	Unbillable	0.00		\$0.00
	Total	0.30		\$255.00
55630	MDD	0:24:00	\$850.00	\$340.00
7/6/2016	Experts			
WIP	Honda CRV			
Email to D. Scott King and DJS Forensics re: finding a NHV expert, send along complaint for them to review.				
Total: 7/6/2016				
	Billable	0.40		\$340.00
	Unbillable	0.00		\$0.00
	Total	0.40		\$340.00
55631	MDD	2:00:00	\$850.00	\$1,700.00
7/7/2016	Experts			
WIP	Honda CRV			
Emails/calls with Scott King re: timeframe, types of documents, records, part reports, warranty reports, engineering drawings, TSBs				
55632	MDD	0:30:00	\$850.00	\$425.00
7/7/2016	Pleading/Brief			
WIP	Honda CRV			
Review Reply to Response to Motion to Dismiss Certain Counts in Plaintiffs Second Class Action Complaint				
Total: 7/7/2016				
	Billable	2.50		\$2,125.00
	Unbillable	0.00		\$0.00
	Total	2.50		\$2,125.00

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Slip ID	Timekeeper	Activity	Units	Rate	Slip Value
Dates and Time	Client				
Status					
Description					
55633	MDD		0:12:00	\$850.00	\$170.00
7/8/2016	Pleading/Brief				
WIP	Honda CRV				
Review Pretrial Order No. 9: Order Memorializing July 6, 2016 Telephone Conference					
Total: 7/8/2016					
	Billable		0.20		\$170.00
	Unbillable		0.00		\$0.00
	Total		0.20		\$170.00
55634	MDD		0:18:00	\$850.00	\$255.00
7/15/2016	Pleading/Brief				
WIP	Honda CRV				
Response in Opposition re Motion to Compel Arbitration And Stay the Claims of Plaintiffs					
Total: 7/15/2016					
	Billable		0.30		\$255.00
	Unbillable		0.00		\$0.00
	Total		0.30		\$255.00
55635	MDD		0:18:00	\$850.00	\$255.00
8/8/2016	Pleading/Brief				
WIP	Honda CRV				
Review Notice by Plaintiffs of Filing Joint Agenda for Status Conference on August 8, 2016					
Total: 8/8/2016					
	Billable		0.30		\$255.00
	Unbillable		0.00		\$0.00
	Total		0.30		\$255.00
55636	MDD		0:12:00	\$850.00	\$170.00
8/9/2016	Pleading/Brief				
WIP	Honda CRV				
Review Pretrial Order No. 10: Order Memorializing August 8, 2016 Telephone Conference					
Total: 8/9/2016					
	Billable		0.20		\$170.00

6/28/2018  
1:54 PMDonovan Litigation Group, LLC  
Slip Listing2

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Slip ID	Dates and Time	Status	Description	Timekeeper	Activity	Client	Units	Rate	Slip Value
					Unbillable		0.00		\$0.00
					Total		0.20		\$170.00
55637	8/11/2016	WIP	TIME	MDD	Experts	Honda CRV	2:00:00	\$850.00	\$1,700.00
Send request to <b>ORC</b> International for a potential expert and subsequent follow-up call									
Total: 8/11/2016									
					Billable		2.00		\$1,700.00
					Unbillable		0.00		\$0.00
					Total		2.00		\$1,700.00
55638	8/12/2016	WIP	TIME	MDD	Experts	Honda CRV	0:30:00	\$850.00	\$425.00
<b>ORC</b> International email stating our requested expert does have a conflict of interest, however <b>Joslyn Jondahl</b> says they have another potential expert, review their <b>CV</b>									
Total: 8/12/2016									
					Billable		0.50		\$425.00
					Unbillable		0.00		\$0.00
					Total		0.50		\$425.00
55639	8/19/2016	WIP	TIME	MDD	Experts	Honda CRV	2:00:00	\$850.00	\$1,700.00
Review and send back signed DJS agreement and call <b>Joslyn</b> at <b>ORC</b> on having a telephone conference call with their recent suggested expert									
55640	8/19/2016	WIP	TIME	MDD	Pleading/Brief	Honda CRV	0:30:00	\$850.00	\$425.00
Review document 73 - Reply to Response to Motion to Compel Arbitration and Stay the Claims of Plaintiffs									
Total: 8/19/2016									
					Billable		2.50		\$2,125.00
					Unbillable		0.00		\$0.00
					Total		2.50		\$2,125.00

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1:54 PMDonovan Litigation Group, LLC  
Slip Listing2

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Slip ID	Dates and Time	Status	Description	Timekeeper	Activity	Client	Units	Rate	Slip Value
55641	8/22/2016	WIP	TIME	MDD	Experts	Honda CRV	2:00:00	\$850.00	\$1,700.00

Telephone call with **ORC** Expert David **McClellan**; send along Second Amended Class Action Complaint; emails with co-counsel re: suitable potential expert, David **McClellan**, who was the engineering director for GM for the Corvette. He is an **SAE** fellow and has tremendous familiarity and background with **NVH**

Total: 8/22/2016

Billable	2.00	\$1,700.00
Unbillable	0.00	\$0.00
Total	2.00	\$1,700.00

55642	8/23/2016	WIP	TIME	MDD	Correspondence	Honda CRV	1:00:00	\$850.00	\$850.00
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Emails with co-counsel re: reviewed expert info and co-counsel agrees he is a potential selection; set up conference call with Expert and co-counsel

Total: 8/23/2016

Billable	1.00	\$850.00
Unbillable	0.00	\$0.00
Total	1.00	\$850.00

55643	8/25/2016	WIP	TIME	MDD	Experts	Honda CRV	1:30:00	\$850.00	\$1,275.00
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Telephone conference call with Expert David **McClellan** and co-counsel; receive David's retainer agreement and send along to co-counsel

Total: 8/25/2016

Billable	1.50	\$1,275.00
Unbillable	0.00	\$0.00
Total	1.50	\$1,275.00

55644	9/28/2016	WIP	TIME	MDD	Correspondence	Honda CRV	0:06:00	\$850.00	\$85.00
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Email to **DJS** letting them know we've found an expert.

Total: 9/28/2016

Billable	0.10	\$85.00
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6/28/2018  
1:54 PMDonovan Litigation Group, LLC  
Slip Listing2

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity			
Status	Client			
Description				
	Unbillable	0.00		\$0.00
	Total	0.10		\$85.00
55645	MDD	0:06:00	\$850.00	\$85.00
10/1/2016	Pleading/Brief			
WIP	Honda CRV			
Review Order vacating September 12, 2016 conference				
Total: 10/1/2016				
	Billable	0.10		\$85.00
	Unbillable	0.00		\$0.00
	Total	0.10		\$85.00
55646	MDD	0:36:00	\$850.00	\$510.00
10/13/2016	Pleading/Brief			
WIP	Honda CRV			
Review Pretrial Order No. 11: Order Continuing Stay of Case Schedule Deadlines				
Total: 10/13/2016				
	Billable	0.60		\$510.00
	Unbillable	0.00		\$0.00
	Total	0.60		\$510.00
Total: MDD				
	Billable	55.10		\$46,835.00
	Unbillable	0.00		\$0.00
	Total	55.10		\$46,835.00
Timekeeper: NA				
55655	NA	3:12:00	\$600.00	\$1,920.00
3/2/2016	Pleading/Brief			
WIP	Honda CRV			
Work on Complaint				
Total: 3/2/2016				
	Billable	3.20		\$1,920.00
	Unbillable	0.00		\$0.00
	Total	3.20		\$1,920.00

6/28/2018  
1:54 PM

Donovan Litigation Group, LLC  
Slip Listing2

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity			
Status	Client			
Description				
55656	NA	3:36:00	\$600.00	\$2,160.00
3/8/2016	Pleading/Brief			
WIP	Honda CRV			
Work on Complaint				
<hr/>				
Total: 3/8/2016	Billable	3.60		\$2,160.00
	Unbillable	0.00		\$0.00
	Total	3.60		\$2,160.00
<hr/>				
Total: NA	Billable	6.80		\$4,080.00
	Unbillable	0.00		\$0.00
	Total	6.80		\$4,080.00
<hr/>				
Grand Total	Billable	123.70		\$67,292.00
	Unbillable	0.00		\$0.00
	Total	123.70		\$67,292.00
<hr/> <hr/>				

# **EXHIBIT C**

KC Time sheets as of Nov 6 2017.txt

TIME SHEET for Krishnan Chittur

Date: Tue Mar 8, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.60

Activity: Review Donovan draft

Date: Fri Mar 11, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 1.00

Activity: Review draft from Donovan

Date: Fri Mar 11, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.20

Activity: Review email from Donovan

Date: Fri Mar 11, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.20

Activity: Email Donovan

Date: Mon Mar 21, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.60

Activity: Review draft complaint

Date: Tue Mar 22, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.20

Activity: Conf with AS

Date: Tue Mar 22, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 1.30

KC Time sheets as of Nov 6 2017.txt  
Activity: Review filing papers

Date: Wed Mar 23, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.20

Activity: review notice from Court

Date: Wed Mar 23, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 2.10

Activity: Review efiled Civil cover Docket Sheet

Date: Thu Mar 24, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.20

Activity: Review Scheduling Order

Date: Thu Mar 24, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.20

Activity: Email Donovan

Date: Tue Apr 19, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Email Donovan

Date: Tue Apr 19, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Email from Donovan

Date: Tue Apr 19, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

KC Time sheets as of Nov 6 2017.txt  
Activity: Email to Donovan

Date: Tue Apr 19, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Email Donovan

Date: Thu Apr 21, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review affidavit of service

Date: Thu Apr 21, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Email Donovan

Date: Mon May 2, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.20

Activity: Review email from Donovan

Date: Mon May 2, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.30

Activity: Review tag along notice to be efiled

Date: Mon May 2, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review efilings by Donovan

Date: Mon May 2, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

KC Time sheets as of Nov 6 2017.txt  
Activity: Review email from Donovan

Date: Tue May 3, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review draft Ltr to judge re conference

Date: Wed May 4, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review Notice of Appearance by Donovan

Date: Wed May 4, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review Ltr re tag along

Date: Wed May 4, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review order

Date: Wed May 4, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.20

Activity: Revise Ltr re adjournment, review efiled Ltr

Date: Wed May 4, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review order

Date: Fri May 6, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

KC Time sheets as of Nov 6 2017.txt  
Activity: Review order of transfer

Date: Fri May 6, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review briefing schedule, notice of filing

Date: Fri May 6, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.30

Activity: Email co-counsel, review email from him, respond

Date: Mon May 16, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review finalized order lifting stay

Date: Mon May 16, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review JPMDL conditional order

Date: Mon May 16, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review EDNY conditional order

Date: Mon May 16, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review transfer order to Ohio

Date: Mon May 16, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10



KC Time sheets as of Nov 6 2017.txt  
Activity: Review dkt 12 re transfer order

Date: Wed May 25, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review conference order

Date: Wed May 25, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review conference order

Date: Wed Jun 1, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.20

Activity: Review joint agenda filing for status conference

Date: Wed Jun 1, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.30

Activity: Review Motion to file documents under seal

Date: Thu Jun 2, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review Order granting seal motion

Date: Thu Jun 2, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review motion re leave to file oversize brief

Date: Thu Jun 2, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.40

KC Time sheets as of Nov 6 2017.txt  
Activity: Review response re motion to dismiss

Date: Thu Jun 2, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review order granting oversize brief

Date: Fri Jun 3, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.50

Activity: Review motion to compel arbitration

Date: Fri Jun 3, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.60

Activity: Review email re arbitration from co-counsel

Date: Fri Jun 3, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.50

Activity: Review def motion to compel arbitration

Date: Mon Jun 6, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review notice of voluntary dismissal

Date: Tue Jun 7, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.30

Activity: Review pre-trial order memorializing telephone conference

Date: Mon Jun 20, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

KC Time sheets as of Nov 6 2017.txt  
Activity: Review motion for extn

Date: Mon Jun 20, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review order re extn

Date: Thu Jun 23, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review order re deadlines

Date: Tue Jun 28, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review notice of voluntary dismissal by Payan

Date: Tue Jun 28, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review notice of joint agenda for status conference

Date: Wed Jul 6, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review notice of appearance

Date: Wed Jul 6, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.20

Activity: Review sealing motion

Date: Wed Jul 6, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

KC Time sheets as of Nov 6 2017.txt  
Activity: Review sealing order

Date: Wed Jul 6, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review email re "minute entry"

Date: Thu Jul 7, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.30

Activity: Review reply re arbitration motion

Date: Fri Jul 8, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.20

Activity: Review pretrial order 9

Date: Fri Jul 8, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review change in status conf date

Date: Fri Jul 15, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.50

Activity: Review response re arb motion

Date: Mon Jul 18, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review motion for extnn

Date: Tue Jul 19, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

KC Time sheets as of Nov 6 2017.txt  
Activity: Review order re extnn of time

Date: Mon Jul 25, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review change of address notification

Date: Mon Jul 25, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review change of address notification

Date: Mon Jul 25, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review change of address noti fn

Date: Thu Jul 28, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review change of address noti fn

Date: Thu Aug 4, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review notice of joint agenda

Date: Mon Aug 8, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review notice re "minute entry"

Date: Tue Aug 9, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.20

KC Time sheets as of Nov 6 2017.txt  
Activity: Review pretrial order no. 10

Date: Fri Aug 19, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.40

Activity: Review reply re arbitrn motion

Date: Thu Sep 8, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review notice of filing joint agenda

Date: Mon Sep 12, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review order re vacating conference

Date: Wed Oct 12, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review notice re order of filing joint status

Date: Wed Oct 12, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review pretrial order re stay of case

Date: Mon Nov 7, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review certificate of service

Date: Mon Nov 14, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

KC Time sheets as of Nov 6 2017.txt  
Activity: Review notice re joint status report

Date: Wed Nov 16, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review consolidation order from JPML

Date: Thu Nov 17, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review order re stay

Date: Thu Nov 17, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.40

Activity: Review email from cocounsel

Date: Thu Nov 17, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Email from cocounsel

Date: Tue Dec 6, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review email from cocounsel

Date: Tue Dec 6, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Email from cocounsel

Date: Wed Dec 14, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

KC Time sheets as of Nov 6 2017.txt  
Activity: Review notice for joint status conference

Date: Wed Dec 14, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Email from cocounsel

Date: Tue Dec 20, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review order continuing stay

Date: Tue Dec 20, 16  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review deadline/status report

Date: Fri Mar 17, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.20

Activity: Review joint motion for stay

Date: Fri Mar 17, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Email from cocounsel

Date: Fri Mar 17, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Email from cocounsel

Date: Fri Mar 17, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10



KC Time sheets as of Nov 6 2017.txt  
Activity: Email cocounsel

Date: Mon Mar 20, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review order 14 extdg stay

Date: Tue Mar 21, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review deadlines

Date: Wed May 3, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review pretrial order 15

Date: Wed May 3, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review minute entry

Date: Fri Jun 30, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review pl notice re status report

Date: Fri Jul 7, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review pretrial order 16

Date: Mon Jul 24, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

KC Time sheets as of Nov 6 2017.txt  
Activity: Review notice of hearing

Date: Wed Jul 26, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review minute entry

Date: Tue Aug 15, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review notice of hearing

Date: Tue Aug 29, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review minute entry

Date: Tue Sep 19, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review notice of status conference

Date: Mon Oct 16, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review motion to continue

Date: Tue Oct 17, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review order granting continuance

Date: Wed Oct 18, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

KC Time sheets as of Nov 6 2017.txt  
Activity: Review deadlines

Date: Wed Oct 18, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review notice from court

Date: Fri Oct 20, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review notice re status report

Date: Mon Oct 30, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Email from cocounsel

Date: Fri Nov 3, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Review filing re joint status report

Date: Fri Nov 3, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: Email from cocounsel

Date: Fri Nov 3, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: TC AS re client approval

Date: Mon Oct 30, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

KC Time sheets as of Nov 6 2017.txt  
Activity: email to AS re client approval

Date: Tue Nov 7, 17  
Billing rate type: Premium  
Hourly rate: 750.00  
Client: Alexandr Kogan  
Matter:  
File ID: /  
Time: 0.10

Activity: TC Andrey; email Donovan

DAY'S BILLABLE: 21.30 \$15975.00  
DAY'S NON-BILLABLE: 0.00  
DAY'S TOTAL: 21.30

# **EXHIBIT D**

AS Time - Kogan v Honda.txt

TIME SHEET for Andrey Strutinskiy

Date: Mon Feb 22, 16  
Billing rate type: Normal (Default Rate)  
Hourly rate: 350.00  
Client: Aleksandr Kogan  
Matter:  
File ID: /  
Time: 0.40

Activity: reviewed retainer and email it to client; TC w/ client

Date: Tue Feb 23, 16  
Billing rate type: Normal (Default Rate)  
Hourly rate: 350.00  
Client: Aleksandr Kogan  
Matter:  
File ID: /  
Time: 0.50

Activity: reviewed draft complaint from Donovan

Date: Mon Mar 21, 16  
Billing rate type: Normal (Default Rate)  
Hourly rate: 350.00  
Client: Aleksandr Kogan  
Matter:  
File ID: /  
Time: 0.70

Activity: Reviewed final draft of the complaint; conf w/ KC

Date: Tue Mar 22, 16  
Billing rate type: Normal (Default Rate)  
Hourly rate: 350.00  
Client: Aleksandr Kogan  
Matter:  
File ID: /  
Time: 1.30

Activity: finalized the complaint for filing

Date: Tue Mar 22, 16  
Billing rate type: Normal (Default Rate)  
Hourly rate: 350.00  
Client: Aleksandr Kogan  
Matter:  
File ID: /  
Time: 1.50

Activity: Prepared cover sheet, summons, finalized complaint for filing, removed formatting errors and filed the complaint on ECF

Date: Wed Mar 23, 16  
Billing rate type: Normal (Default Rate)  
Hourly rate: 350.00  
Client: Aleksandr Kogan  
Matter:  
File ID: /  
Time: 0.30

Activity: filing Summons and civil cover sheet

Date: Wed Mar 23, 16  
Billing rate type: Normal (Default Rate)  
Hourly rate: 350.00  
Client: Aleksandr Kogan  
Matter:  
File ID: /

AS Time - Kogan v Honda.txt

Time: 0.50

Activity: downloaded and reviewed ECF filings and entries; prepared copies of the Summonses and Complaint for service upon the defendants

Date: Fri Mar 25, 16

Billing rate type: Normal (Default Rate)

Hourly rate: 350.00

Client: Aleksandr Kogan

Matter:

File ID: /

Time: 1.70

Activity: served S&C at CT Corp upon American Honda, service upon Honda Motors was refused, CT is not their registered agent

Date: Thu Apr 21, 16

Billing rate type: Normal (Default Rate)

Hourly rate: 350.00

Client: Aleksandr Kogan

Matter:

File ID: /

Time: 0.50

Activity: completed and filed proof of service

Date: Wed May 4, 16

Billing rate type: Normal (Default Rate)

Hourly rate: 350.00

Client: Aleksandr Kogan

Matter:

File ID: /

Time: 0.40

Activity: Communication with co-counsel re court conference, Filed letter with the court re adjournment

Date: Tue Dec 13, 16

Billing rate type: Normal (Default Rate)

Hourly rate: 350.00

Client: Aleksandr Kogan

Matter:

File ID: /

Time: 0.20

Activity: reviewed time sheets and expenses

DAY'S BILLABLE: 8.00 \$2800.00

DAY'S NON-BILLABLE: 0.00

DAY'S TOTAL: 8.00

# **EXHIBIT E**





## INVOICE

Date: 06/27/2018  
Due Upon Receipt

### Bell Law, LLC

2600 Grand Blvd., Ste. 580  
Kansas City, Missouri 64108  
United States

Amy E. Bertram

### Auto Fraud 4:16-cv-01120-DGK Western District

#### Services

Type	Attorney	Date	Description	Quantity	Rate	Total
Service	BB	09/26/2016	Consumer Protection: Review docket on MDL'ed case and Amended Complaint. AC filed in 1st half of 2016, but no class cert motion so far. Review Defendants' Mtn to Compel Arbitration filed by American Honda Motor to see how certain plaintiffs claims are trying to be compelled to arbitration.	1.00	\$400.00	\$398.78
Service	BB	09/27/2016	Consumer Protection: Review client timeline; save to case file.	0.10	\$400.00	\$40.00
Service	BB	09/27/2016	Consumer Protection: Review client docs to see if there is any evidence of client receiving product enhancements. Email update to attorneys and provide update on status of case, and request info as to whether or not the client's vehicle has been modified with the "available product enhancements" that Honda is claiming is a prerequisite to bringing a claim.	0.20	\$400.00	\$80.00
Service	MS	09/27/2016	Mark Schmitz: review docs	0.25	\$300.00	\$75.00
Service	BB	09/27/2016	Consumer Protection: Review email on status of "product enhancements" on client's vehicle; respodn that I will try to dig deeper into the filings to see exactly that that entails. Review MTD in OH MDL case; review service bulletin 15-046 and advise attorneys as to probable courses of action including requesting an email confirmation	0.40	\$400.00	\$160.00

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			from the dealer's service dept that the bulletin recommendations have been implemented.			
Service	BB	09/28/2016	Consumer Protection: Review Bertram email confirming that Tom has all service records. Review service records in detail, in conjunction with the service bulletin 15-046. Analyze docs to see if case is "ripe" yet.	0.40	\$400.00	\$160.00
Service	MS	09/28/2016	Mark Schmitz: Research nationwide/ missouri sales on the 2015 honda CRV, looking for a way to avoid CAFA	0.25	\$300.00	\$75.00
Service	MS	09/28/2016	review case file; anticipate drafting petition	0.50	\$300.00	\$150.92
Service	BB	09/28/2016	Consumer Protection: TC w/ Ben Barnow; discuss status of case and strategies moving forward. Discuss case with MS; MS to research ways to avoid MDL / keep case in state court. Agree to move forward with MO only class ASAP.	0.50	\$400.00	\$200.00
Service	BB	09/28/2016	Consumer Protection: Draft and send email update to counsel advising on status of case, proposed strategy moving forward, and issues we need to watch out for such as arbitration, and ripeness, etc. and timeline for getting a case on file.	0.20	\$400.00	\$80.00
Service	MS	09/29/2016	Mark Schmitz: Draft petition	3.85	\$300.00	\$1,155.83
Service	MS	09/29/2016	Mark Schmitz: research MO law on non-signatory enforcement of arbitration provision	0.20	\$300.00	\$60.00
Service	MS	09/29/2016	Mark Schmitz: research MMWA impact on non-signatory enforcement of arbitration	0.50	\$300.00	\$150.00
Service	MS	09/29/2016	Mark Schmitz: print; review and revise draft petition; make edits to draft petition and prepare to send to bbb and asw for further revisions	1.75	\$300.00	\$525.00
Service	MS	10/03/2016	Mark Schmitz: Update petition with MMPA violations	0.20	\$300.00	\$60.00
Service	BB	10/06/2016	Consumer Protection: Discuss status of the case; BBB has draft of petition from MS. Discuss obstacles need to overcome / address in initial petition. BBB to likely reach out to the client today or tomorrow.	0.10	\$400.00	\$40.00
Service	BB	10/12/2016	Consumer Protection: Final case review. Discuss with MS.	0.25	\$400.00	\$100.00
Service	BB	10/13/2016	Consumer Protection: Continued review of class action draft petition; markup changes.	0.75	\$400.00	\$300.00

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Service	BB	10/18/2016	Consumer Protection: Add final notes to petition; meet with MS and go through entire document.	4.45	\$400.00	\$1,779.89
Service	MS	10/18/2016	Mark Schmitz: print review revise petition w/ BBB	0.60	\$300.00	\$180.00
Service	BB	10/19/2016	Consumer Protection: Confirm final changes with Tom Mendel; send email to ASW and TM with plan of action and advise to contact me ASAP with any changes. Send final PDF to admin via email.	0.10	\$400.00	\$40.00
Service	BB	10/19/2016	Consumer Protection: Review email from ASW with grammatical change, revise and re-send to counsel and admin.	0.10	\$400.00	\$40.00
Service	BB	10/19/2016	Consumer Protection: Review filed case and save to case file. Send copy to interim lead counsel for Defendant Honda; copy TM and ASW. Discuss change of defendant info w/ admin; admin working with clerks office to make changes.	0.40	\$400.00	\$160.00
Service	BB	10/26/2016	Consumer Protection: Study and analyze draft ROS; authorize filing. Review filed ROS; save to case file.	0.10	\$400.00	\$40.00
Service	BB	11/04/2016	Consumer Protection: TC w/ Simone Jones, discuss status of case and MDL in Ohio; requests extension or stay pending decision of JPML.	0.10	\$400.00	\$40.00
Service	MS	11/04/2016	Mark Schmitz: Review email from BBB re: tag-along research assignment	0.10	\$300.00	\$30.00
Service	MS	11/04/2016	Research implications of "tag-along" term for possible settlement and class action membership in the broader MDL; email results of research to BBB	0.20	\$300.00	\$60.00
Service	BB	11/04/2016	Consumer Protection: Review recent filings in Ohio MDL RE: our case; advise that	0.10	\$400.00	\$40.00
Service	BB	11/07/2016	Consumer Protection: TC w/ Simone; discuss status of their request to stay present proceedings in front of the JPML. Still waiting to discuss same with others involved, and will get back to her.	0.10	\$400.00	\$40.00
Service	BB	11/07/2016	Consumer Protection: Review email response from MS regarding "tag-along" cases, and whether or not that has any material implications moving forward to the MDL, at least potentially.	0.10	\$400.00	\$40.00
Service	BB	11/07/2016	Consumer Protection: Review JPML case activity filing; save to case file.	0.10	\$400.00	\$40.00

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Service	BB	11/08/2016	Consumer Protection: Review email from Simone Jones; fwd draft motion to stay case in Western District of Missouri to TM and ASW. Review feedback from both.	0.20	\$400.00	\$80.00
Service	BB	11/09/2016	Consumer Protection: Print and review Jtn Mtn to Stay case in WDMO; reply to Simone Jones to proceed with filing same as drafted.	0.20	\$400.00	\$80.00
Service	BB	11/10/2016	Consumer Protection: Review recent case filings, including Mtn for PHV for SJ, corporate interest disclosure statement, Joint Mtn to Stay, and approval of PHV (11/10).	0.20	\$400.00	\$80.00
Service	BB	11/14/2016	Consumer Protection: Review case update from ECF; update on status of the	0.20	\$400.00	\$80.00
Service	BB	11/16/2016	Consumer Protection: Review JPML final order transferring our case to the Ohio MDL: fwd same to Tom Mendel, ASW, and MS. Save to case file.	0.10	\$400.00	\$40.00
Service	BB	12/01/2016	Consumer Protection: Review email from Tom Mendel on status of software updates performed on client's vehicle; review response from ASW. Respond that we should ask client if she has anything in writing about the update, and ask if the car still vibrates.	0.20	\$400.00	\$80.00
Service	BB	12/06/2016	Consumer Protection: TD w/ David Stein to discuss status of case; discuss potential mediation within the next 60 days, arbitration issues are currently stayed. Agree to send case file;	0.30	\$400.00	\$120.00
Service	BB	12/06/2016	Consumer Protection: Confer with ASW; discuss status of call w/ David Stein. Discuss mediation, and potential resolution for Missouri consumers moving forward.	0.20	\$400.00	\$80.00
Service	BB	12/06/2016	Consumer Protection: Draft and send email to MS and TM. MS to research issues on new TSB updates on CRV; request update from TM on any docs or additional narrative from client.	0.10	\$400.00	\$40.00
Service	BB	12/06/2016	Consumer Protection: Draft and send email to MS, ASW, and TM on teleconference with David Stein, and thoughts on sharing client docs moving forward.	0.10	\$400.00	\$40.00
Service	BB	12/06/2016	Consumer Protection: Review response from Tom Mendel on the status of his conversation with client. Client will send	0.10	\$400.00	\$40.00

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			updates on scope of repairs performed, and will be updated regarding status of case at this point.			
Service	BB	12/08/2016	Consumer Protection: Review email from Tom Mendel with update on the client's latest service update at the dealer and the software update. Review recall notice related to the CVT software update, and client docs. Save to case file. Appears to be unrelated to the vibration issue. Draft and send reply to Tom and co-counsel.	0.25	\$400.00	\$100.00
Service	BB	12/08/2016	Consumer Protection: Review email from David Stein; reply with thoughts on case in general, MO consumer laws and potential for punitive damages, mediation, request to assist with litigation, updates on the latest TSB for the CRV software (appears to be unrelated to the vibration issue), and the preservation letter to send to the client.	0.20	\$400.00	\$80.00
Service	BB	12/13/2016	Consumer Protection: Review email from David Stein on status of case and upcoming mediation, and template for client preservation of docs, etc. Fwd email to co-counsel, and advise TM to send client preservation template.	0.20	\$400.00	\$80.00
Service	BB	12/15/2016	Consumer Protection: Review email from Tom Mendel; draft and send reply regarding time sheets, preservation letter, and any other issues to address with lead counsel.	0.10	\$400.00	\$40.00
Service	BB	12/15/2016	Consumer Protection: Review MDL filing; mediation set for March 7-8th. Fwd same to co-counsel in KC. Reply to David Stein's email stating that we're ready and willing to help out if/when the need arises.	0.10	\$400.00	\$40.00
Service	BB	12/20/2016	Consumer Protection: Review ECF filing noting that the case has now been stayed until March 14, 2017. Fwd same to MS and ASW.	0.10	\$400.00	\$40.00
Service	BB	02/01/2017	Consumer Protection: Review docket and deadlines. Check on Mediation date set for March 7-8, 2017. Draft and send email to D. Stein to see if we can do anything to assist with the mediation process as it relates to Missouri consumers, etc.	0.10	\$400.00	\$40.00
Service	BB	03/17/2017	Consumer Protection: Review email from lead counsel on call scheduled for 3/27 on status of case after mediation. Review Orders staying deadlines for another 45	0.20	\$400.00	\$80.00

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			days. Send email to Tom to advise client on status of case.			
Service	BB	03/20/2017	Consumer Protection: Review email from ECF on Vibration MDL; stay extended for 45 days. Save to case file. Fwd same to Tom Mendel and advise to pass along to the client.	0.10	\$400.00	\$40.00
Service	BB	03/28/2017	Consumer Protection: TC RE: case status and mediation and potential settlement.	0.75	\$400.00	\$300.00
Service	BB	03/30/2017	Consumer Protection: TC w/ David Stein on status of CRV settlement.	0.10	\$400.00	\$40.00
Service	BB	04/04/2017	Consumer Protection: Review MOU sent from attorney Troutman.	0.10	\$400.00	\$40.00
Service	BB	04/14/2017	Consumer Protection: Draft and send updated email to David Stein based on client questions, and request an update on the additional issues (discovery, more information on the settlement).	0.10	\$400.00	\$40.00
Service	BB	05/11/2017	Consumer Protection: Send update to TM per client's request on status of case and proposed settlement.	0.10	\$400.00	\$40.00
Service	BB	07/07/2017	Consumer Protection: Review order extending pre trial deadline; fwd same to TM and admin.	0.10	\$400.00	\$40.00
Service	BB	07/24/2017	Consumer Protection: Review email from ECF filing with notice of hearing on Wednesday; save to case file. Reply to DS with email concerning hearing and potential rep from TN.	0.10	\$400.00	\$40.00
Service	BB	09/13/2017	Consumer Protection: TC w/ David Stein; discuss status of the case and settlement.	0.20	\$400.00	\$80.00
Service	BB	09/15/2017	Consumer Protection: Send email to DS with update on status of conversations with client, copy TM. Review reply.	0.10	\$400.00	\$40.00
Service	BB	09/21/2017	Consumer Protection: Exchange emails with DS and TM on setting up a call with client.	0.10	\$400.00	\$40.00
Service	BB	10/03/2017	Consumer Protection: Exchange emails with TM and counsel to arrange call with client today.	0.10	\$400.00	\$40.00
Service	BB	10/03/2017	Consumer Protection: TC w/ client, TM, and DS.	1.10	\$400.00	\$440.00
Service	BB	10/04/2017	Consumer Protection: TC w/ Dave Stein on status of repairs made to client's vehicle.	0.20	\$400.00	\$80.00

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			Appears all repairs and known fixes have been made. Will follow up with client and advise as to whether or not she wants to participate in the settlement.			
Service	BB	10/04/2017	Consumer Protection: Follow up TC w/ TM and advise on DS's findings and what to advise the client. Review follow up email to client advising of status of repairs and settlement options.	0.20	\$400.00	\$80.00
Service	BB	11/02/2017	Consumer Protection: Review email from David Stein; reply. TC w/ DS on final status of final settlement and increase in incentive awards. Fwd message to Tom Mendel.	0.20	\$400.00	\$80.00
Service	BB	11/03/2017	Consumer Protection: Review email from ECF with Joint Status Report, save to case file.	0.10	\$400.00	\$40.00
Service	BB	01/16/2018	Consumer Protection: Review email from David Stein on status of case and final settlement docs; save to case file. Fwd same to TM.	0.23	\$400.00	\$92.33
Service	BB	01/18/2018	Consumer Protection: Review email from TM on client signing off on paperwork. Send email to David Stein to see if he agrees that we can have client e-sign.	0.20	\$400.00	\$80.00
<b>Services Subtotal</b>						<b>\$9,272.75</b>

**Expenses**

Type	Attorney	Date	Description	Quantity	Rate	Total
Expense	JB	10/10/2016	Pacer Searches ON 9/26 AND 9/27- CASE NO: 2:15-md-02661-MHW-EPD	1.00	\$19.30	\$19.30
Expense	JB	10/19/2016	Filing fee - western district of Missouri	1.00	\$400.00	\$400.00
Expense	JB	10/27/2016	D&B Legal Services Invoice - Service of Complaint & Summons to American Honda Motor Co Inc.	1.00	\$100.00	\$100.00
Expense	JB	01/16/2017	Pacer Quarterly Invoice Searches - 10/1/2016 through 12/31/2016	1.00	\$16.10	\$16.10
Expense	JB	04/12/2018	Pacer Quarterly Charges 1/1/2018 - 3/31/2018	1.00	\$2.70	\$2.70
<b>Expenses Subtotal</b>						<b>\$538.10</b>
<b>Subtotal</b>						<b>\$9,810.85</b>
<b>Total</b>						<b>\$9,810.85</b>

06/27/2018



# **EXHIBIT F**

Date	Matter	Description	User	Rate	Total
12/07/ 2016	<u>2016.00145-Bertram v. American Honda Motor Co., Inc</u>	Reviewed service records and researched TSB and recall work performed on client's CRV, email co-counsel with update.	<u>Thomas Mendel</u>  0.20	\$0.00	\$0.00
12/01/ 2016	<u>2016.00145-Bertram v. American Honda Motor Co., Inc</u>	Emails with client and co-counsel regarding client's recent "recall" service work and computer software update to her CRV.	<u>Thomas Mendel</u>  0.20	\$0.00	\$0.00
10/31/ 2016	<u>2016.00145-Bertram v. American Honda Motor Co., Inc</u>	Telephone call with client answer questions regarding case and provide update and status on the case	<u>Thomas Mendel</u>  0.20	\$0.00	\$0.00
10/19/ 2016	<u>2016.00145-Bertram v. American Honda Motor Co., Inc</u>	Proof draft Petition for Damages, telephone call and emails with Bryce to discuss draft of Petition	<u>Thomas Mendel</u>  0.80	\$0.00	\$0.00
09/14/ 2016	<u>2016.00145-Bertram v. American Honda Motor Co., Inc</u>	Meeting with Client and inspection of vehicle	<u>Thomas Mendel</u>  2.00	\$0.00	\$0.00
09/07/ 2016	<u>2016.00145-Bertram v. American Honda Motor Co., Inc</u>	Email with client and Scott Waddell to schedule meeting	<u>Thomas Mendel</u>  0.10	\$0.00	\$0.00
09/06/ 2016	<u>2016.00145-Bertram v. American Honda Motor Co., Inc</u>	Email with Scott to schedule meeting with client	<u>Thomas Mendel</u>  0.10	\$0.00	\$0.00
09/04/ 2016	<u>2016.00145-Bertram v. American Honda Motor Co., Inc</u>	Email with Scott to schedule meeting	<u>Thomas Mendel</u>  0.10	\$0.00	\$0.00
09/04/ 2016	<u>2016.00145-Bertram v. American Honda Motor Co., Inc</u>	Email with Client to schedule meeting and car inspection	<u>Thomas Mendel</u>  0.10	\$0.00	\$0.00
08/31/ 2016	<u>2016.00145-Bertram v. American Honda Motor Co., Inc</u>	Email with client to arrange meeting with Scott Waddell	<u>Thomas Mendel</u>  0.10	\$0.00	\$0.00
08/30/ 2016	<u>2016.00145-Bertram v. American Honda Motor Co., Inc</u>	Telephone call with client to discuss facts of her CRV vibration and vehicle sale.	<u>Thomas Mendel</u>  0.10	\$0.00	\$0.00
08/23/ 2016	<u>2016.00145-Bertram v. American Honda Motor Co., Inc</u>	Telephone call with client to discuss class action and duties of class representative.	<u>Thomas Mendel</u>  0.20	\$0.00	\$0.00

Date	Matter	Description	User	Rate	Total
08/23/ 2016	<u>2016.00145-Bertram v. American Honda Motor Co., Inc</u>	Research Honda CRV vibration defect and out of state class action litigation	<u>Thomas Mendel</u>  0.50	\$0.00	\$0.00
08/01/ 2016	<u>2016.00145-Bertram v. American Honda Motor Co., Inc</u>	Meeting with client - discussed facts of her case	<u>Thomas Mendel</u>  1.00	\$0.00	\$0.00
07/18/ 2016	<u>2016.00145-Bertram v. American Honda Motor Co., Inc</u>	Telephone call from Client - discussed facts of her CRV vibration issue.	<u>Thomas Mendel</u>  0.30	\$0.00	\$0.00
			6.00		\$0.00

# **EXHIBIT G**

# Waddell Law Firm LLC

2600 Grand, Suite 580

Kansas City, MO 64108

Phone: 816.914.5365 | Fax:

## Account Statement

Prepared for Amy Bertram

Re: Amy Bertram v. Honda class action

Previous Invoice Amount	
Last Payment Received	
Previous Balance	\$0.00
Current Charges	\$3,280.00
Total Due	

# Waddell Law Firm LLC

2600 Grand, Suite 580

Kansas City, MO 64108

Phone: 816.914.5365 | Fax:

Amy Bertram

Invoice Date: June 27, 2018

Invoice Number: Pre-bill

Invoice Amount: \$3,280.00

## Matter: Amy Bertram v. Honda class action

### Attorney's Fees

9/26/2016	Strategy meeting with Bryce regarding the current case on file and avoiding arbitration.	A.W.	.10	\$40.00
9/27/2016	Review and analyze client's email and subject chronology; forward same to team.	A.W.	.20	\$80.00
9/27/2016	Review and respond to Tom Mendal's email regarding the status of matter.	A.W.	.10	\$40.00
9/27/2016	Review Bryce's email regarding whether client's vehicle had the subject "enhancements".	A.W.	.10	\$40.00
9/27/2016	Draft email to client regarding Bryce's email regarding whether client's vehicle had the subject "enhancements".	A.W.	.10	\$40.00
9/27/2016	Review Bryce's email regarding: Also, the current MDL in Ohio is still fending off Motions to Dismiss and Compel Arbitration. As such, the Plaintiffs in that case have not yet moved for class cert.	A.W.	.10	\$40.00
9/27/2016	Telephone conference with client regarding what Honda has done so far to rectify problem.	A.W.	.10	\$40.00
9/27/2016	Draft email to team following this evening's call with client about what Honda has tried to do to fix the problem.	A.W.	.10	\$40.00
9/28/2016	Review client's email regarding her production of service records to Tom Mendel.	A.W.	.10	\$40.00
9/28/2016	Review Mark and Tom's emails regarding whether or not Honda can compel us to the dealer's arbitration clause.	A.W.	.10	\$40.00
9/28/2016	Review and respond to Bryce's email regarding strategy for filing matter and trying to avoid MDL and federal jurisdiction.	A.W.	.10	\$40.00
9/28/2016	Review Bryce's responsive email to Tom Mendal	A.W.	.10	\$40.00

	regarding avoiding suing the dealer.			
10/2/2016	Review Tom Mendel's email regarding client's service records.	A.W.	.10	\$40.00
10/6/2016	Strategy meeting with Bryce regarding status of matter.	A.W.	.10	\$40.00
10/12/2016	Strategy meeting with Bryce regarding status of the subject Petition.	A.W.	.10	\$40.00
10/19/2016	Review Bryce's email regarding: Got that changed. I'm going to file it this morning so please contact me if anyone has any last minute changes.	A.W.	.10	\$40.00
10/19/2016	Review Bryce's email regarding: Tom and Scott: Per recent filings, this case appears close to a settlement in the next 30-45 days. See attached. I can get this case on file tonight (unless Tom wants to do the honors). Potential plan of action: File in state court tonight, get defendant served ASAP; File in Western District Court tonight, perhaps get MDL'ed faster, and/or email defense counsel to see if they will waive service. Frankly, I'm not sure this matters. I'm sure all sides would want to bring us into the fold regardless. But, we need to get something on file ASAP. Thoughts? Feel free to give me a ring (816) 698-5207.	A.W.	.10	\$40.00
10/19/2016	Review the Joint Status Report in the Ohio case.	A.W.	.10	\$40.00
10/19/2016	Review Bryce's email regarding the proposed Complaint.	A.W.	.10	\$40.00
10/19/2016	Review, edit and supplement Bryce's draft Complaint.	A.W.	.40	\$160.00
10/19/2016	Draft email to team regarding my proposed changes to the subject Complaint.	A.W.	.10	\$40.00
10/19/2016	Review Bryce's email regarding: Attached is the final version that is being filed now. It is now paragraph 31, and period has been added. I plan to serve the corporation via regular means as then they only have 21 days to respond, and send a courtesy copy to interim lead counsel for the defense. Tom - you are more than welcome to do the honors regarding the later. Let me know. Thank you!	A.W.	.10	\$40.00
10/19/2016	Review Tom's email regarding permission to file.	A.W.	.10	\$40.00
10/19/2016	Review Tom's email to client regarding the subject Complaint being on file.	A.W.	.10	\$40.00
10/19/2016	Review the string of emails regarding getting D&B to serve Complaint ASAP.	A.W.	.10	\$40.00
10/19/2016	Review Bryce's email to opposing counsel regarding a courtesy copy of the subject Complaint.	A.W.	.10	\$40.00
10/19/2016	Review and respond to the series of emails regarding drawing Judge Kays as judge of matter.	A.W.	.10	\$40.00
10/19/2016	Review Bryce's email regarding need to alert client that matter is now on file.	A.W.	.10	\$40.00
10/19/2016	Review the Court's electronic notification regarding the NOTICE OF INCLUSION FOR MEDIATION	A.W.	.10	\$40.00

	AND ASSESSMENT PROGRAM (MAP). REVIEW NOTICE AND MAP GENERAL ORDER CAREFULLY FOR IMPORTANT CHANGES, DEADLINES AND REQUIREMENTS.			
10/19/2016	Review the NOTICE OF INCLUSION FOR MEDIATION AND ASSESSMENT PROGRAM (MAP). REVIEW NOTICE AND MAP GENERAL ORDER CAREFULLY FOR IMPORTANT CHANGES, DEADLINES AND REQUIREMENTS and the MAP General Order.	A.W.	.20	\$80.00
10/26/2016	Review the Court's electronic notification regarding the RETURN OF SERVICE of complaint executed by Amy Bertram. American Honda Motor Co., Inc. served on 10/19/2016, answer due 11/9/2016. (Bell, Bryce).	A.W.	.10	\$40.00
10/31/2016	Meeting with Bryce regarding possible expert witness selection.	A.W.	.10	\$40.00
11/4/2016	Review Bryce's status update regarding the attached tag along filings.	A.W.	.10	\$40.00
11/4/2016	Draft responsive correspondence to Bryce's status update regarding the attached tag along filings.	A.W.	.10	\$40.00
11/7/2016	Research opposing counsel Liv Kiser's online profile and experience.	A.W.	.20	\$80.00
11/7/2016	Review the electronic notification from the Court regarding the filing of the: Notice of Electronic Filing The following transaction was entered by Kiser, Livia on 11/7/2016 at 2:01 PM EST and filed on 11/7/2016 Case Name: IN RE: American Honda Motor Co., Inc., CR-V Vibration Marketing and Sales Practices Litigation Case Number: MDL No. 2661 Filer: Document Number: 55	A.W.	.10	\$40.00
11/8/2016	Review the proposed motion to stay proceedings and the emails from Bryce and Tom regarding same.	A.W.	.20	\$80.00
11/8/2016	Draft email to Tom Mendel regarding his MDL experience.	A.W.	.10	\$40.00
11/8/2016	Review Janis' email regarding the Notice of the Tag Along Action.	A.W.	.10	\$40.00
11/8/2016	Review the conditional transfer orders filed today.	A.W.	.10	\$40.00
11/8/2016	Review the Court's electronic notification regarding: NOTICE OF FILING OF CTO AND PUBLICATION OF BRIEFING SCHEDULE (CTO-4) re: pldg. ([56] in MDL No. 2661, 2 in MOW/4:16-cv-01120)	A.W.	.10	\$40.00
11/8/2016	Review today's mail from Sidley Austin.	A.W.	.10	\$40.00
11/10/2016	Review the Court's electronic notification regarding ORDER granting [6] motion to appear pro hac vice entered by Clerk of Court. Attorney Johnnet Simone Jones for American Honda Motor Co., Inc. allowed to appear pro hac vice. This entry will serve as authorization for the pro hac participation by the attorney.	A.W.	.10	\$40.00



11/10/2016	Review the Court's electronic notification regarding: Motion to allow Johnnet Simone Jones to appear pro hac vice (Pro Hac fee \$50 receipt number 0866-5057870) filed by Ann M. Songer on behalf of American Honda Motor Co., Inc.. (Songer, Ann)	A.W.	.10	\$40.00
11/10/2016	Review the Court's electronic entry regarding ORDER granting [4] motion to stay. Signed on November 10, 2016, by Chief District Judge Greg Kays.	A.W.	.10	\$40.00
11/14/2016	Review Bryce's email regarding the Joint Status Report.	A.W.	.10	\$40.00
11/14/2016	Review today's filed Joint Status Report.	A.W.	.10	\$40.00
11/14/2016	Draft response to team regarding Bryce's email regarding the Joint Status Report.	A.W.	.10	\$40.00
11/16/2016	Review the Court's electronic notification regarding the CONDITIONAL TRANSFER ORDER FINALIZED (CTO-4) - 1 action(s) re: pldg. ([56] in MDL No. 2661, 2 in MOW/4:16-cv-01120) Inasmuch as no objection is pending at this time, the stay is lifted.	A.W.	.10	\$40.00
11/16/2016	Review the Court's electronic notification regarding the MDL CONDITIONAL TRANSFER ORDER, CTO-4, from Jeffery N. Luthi, Clerk of the Panel, transferring case to Southern District of Ohio to be included in MDL No. 2661. Signed on November 16, 2016. Case electronically transferred. (Melvin, Greg).	A.W.	.10	\$40.00
12/2/2016	Review and respond to Tom and Bryce's emails regarding client's recent service visit.	A.W.	.10	\$40.00
12/6/2016	Strategy meeting with Bryce regarding his conversation with MDL lead counsel and regarding the status of matter and division of labor.	A.W.	.20	\$80.00
12/6/2016	Review Bryce's status update regarding his call today with counsel David Stein.	A.W.	.10	\$40.00
12/6/2016	Draft responsive correspondence to Bryce's status update regarding his call today with counsel David Stein.	A.W.	.10	\$40.00
12/6/2016	Review Bryce's email regarding: Mark: Can you check to see if there has been a TSB update in the last 30 days or so on the CRV? Want to see if there is a new vibration "fix" related to the software update client received a week ago. Tom: Any word from the client on docs or other info relating to the software update that you emailed us a week ago about? Has this improved the vibration? Thanks, Bryce	A.W.	.10	\$40.00
12/6/2016	Review and respond to Bryce's email regarding his interactions with David Stein at Gibbs Law Group.	A.W.	.10	\$40.00
12/7/2016	Review Tom Mendel's email regarding client's recent vehicle repairs.	A.W.	.10	\$40.00
12/7/2016	Draft email to team regarding we need to attend the	A.W.	.10	\$40.00

	subject mediation.			
12/7/2016	Strategy meeting with Bryce in preparation for how to handle the upcoming mediation.	A.W.	.10	\$40.00
12/8/2016	Review Tom's update on the most recent repairs made to client's car.	A.W.	.10	\$40.00
12/8/2016	Review Bryce's responsive email to Tom regarding the client's most recent repairs performed.	A.W.	.10	\$40.00
12/8/2016	Review Bryce's email regarding Dan LeBel regarding his experience with Plaintiffs' lead MDL counsel.	A.W.	.10	\$40.00
12/11/2016	Review Bryce's email and the chain from Isaac Wiles regarding the upcoming reporting deadlines.	A.W.	.10	\$40.00
12/11/2016	Draft responsive email to Bryce's email and the chain from Isaac Wiles regarding the upcoming reporting deadlines.	A.W.	.10	\$40.00
12/11/2016	Review the Time and Expense Reporting Protocol.	A.W.	.10	\$40.00
12/12/2016	Strategy conference call Bryce and Rex regarding the upcoming mediation and how to handle same.	A.W.	.20	\$80.00
12/14/2016	Review Bryce Bell's status update.	A.W.	.10	\$40.00
12/16/2016	Review the NOTICE of Filing Joint Status Report.	A.W.	.10	\$40.00
12/20/2016	Review Court's electronic notification regarding Set Deadline: Status Report due by 3/14/2017.	A.W.	.10	\$40.00
12/20/2016	Review Pretrial Order No. 13: Order Continuing Stay of Case Schedule Deadlines and Bryce's follow up email regarding same.	A.W.	.10	\$40.00
4/28/2018	Review Unopposed MOTION for Settlement Preliminary Approval of Class Settlement by Plaintiffs Michelle Bergendahl, Robert Bergendahl, Amy Bertram, Robert Fennes, Julia Hsi, Bakh Inamov, Aleksandr Kogan, Robert Nonni, Thomas Michael Prychitko, Michael Stanley, Emily Vellano.	A.W.	.20	\$80.00
5/11/2018	Review the preliminary order on class settlement approval.	A.W.	.10	\$40.00
SUBTOTAL:			8.20	\$3,280.00

**Costs**

SUBTOTAL: \$0.00

TOTAL: \$3,280.00  
PREVIOUS BALANCE DUE: \$0.00  
CURRENT BALANCE DUE AND OWING: \$3,280.00

**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,

This document relates to: ALL CASES

Case No. 2:15-md-2661

Judge Michael H. Watson  
Magistrate Judge Deavers

**DECLARATION OF KARLA GILBRIDE IN SUPPORT OF PLAINTIFFS' MOTION  
FOR ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Karla A. Gilbride, declare:

1. I am a member of the bar of the State of California and the District of Columbia admitted to this Court pro hac vice and am a staff attorney at Public Justice P.C., one of the counsel for plaintiffs in this litigation. This declaration is submitted in support of Plaintiffs' Motion for Award of Attorneys' Fees and Reimbursement of Costs, in the above-entitled matter. The matters stated herein are true and correct of my own personal knowledge and if called upon to testify thereto I could and would do so.

2. I became involved in this case in June of 2016 when attorneys from Gibbs Law Group approached my colleague Leslie Bailey at Public Justice about assisting with defending against a motion to compel arbitration that had been filed by American Honda Motor Company (Honda) in this MDL action. Because I had recently filed several appellate briefs involving the rights of nonsignatories to enforce arbitration agreements, including arguments for enforcement based on equitable estoppel, Ms. Bailey and I determined that I would take the lead in drafting the opposition to Honda's motion to compel arbitration. I then entered into a co-counsel agreement with the Gibbs Law Group on behalf of Public Justice, stipulating that Public Justice attorneys would join the case for purposes of opposing Honda's motion to compel arbitration and handling any resulting appeal, and that Public Justice attorneys would be compensated for their time out of

any settlement or court award of attorneys' fees based on our proportionate lodestar (hours expended at current hourly rates).

3. The law firm of Public Justice, P.C. is experienced in complex class litigation, including cases brought in both federal and state courts. For example, Public Justice was counsel for the plaintiff in an appeal before the California Supreme Court in *Sandquist v. Lebo Automotive*, where the Court permitted a former employee's race discrimination claims against a car dealership to proceed on a class action basis. 1 Cal.5th 233 (2016). Public Justice was also co-counsel in five class actions in North Carolina state court against payday lenders for charging consumers illegal interest rates, and helped to recover tens of millions of dollars for some of North Carolina's most financially vulnerable consumers. *Kucan v. Advance America* settled for \$18.25 million, *McQuillan v. Check'N Go* settled for \$14 million, and *Hager v. Check Into Cash* settled for \$12 million. Checks have been cashed by more than 200,000 class members in these three cases. More recently, Public Justice was among class counsel in *White v. Experian Information Solutions*, 8:05-cv-01070-DOC-MLG, before the U.S. District Court for the Central District of California, a case alleging violations of federal and California law for failing to accurately report debts discharged in bankruptcy in which Judge David O. Carter granted final approval of a class settlement, as well as plaintiffs' request for attorneys' fees, on April 6, 2018.

4. I have considerable experience prosecuting class actions since graduating from law school in 2007. I have specialized in class action litigation since serving as a fellow at Disability Rights Advocates in Berkeley, CA from 2008-2010, where I participated in *National Federation of the Blind v. Target Corp.* in the U.S. district Court for the Northern District of California and *Communities Actively Living Independent and Free v. City and County of Los Angeles* in the U.S. district court for the Central District of California, both involving class claims on behalf of Californians with disabilities. While working as an associate with Mehri & Skalet, PLLC in Washington, D.C. from 2011 through 2014, I continued to bring class actions on behalf of consumers, including *Sonoda v. Amerisave Mortgage corp.* (N.D. Cal., Judge Chen) involving TILA violations and illegal fees charged by an online mortgage broker, and *Hensley-McClean v.*

*Safeway* (N.D. Cal., Judge Seeborg) involving Safeway's failure to notify customers of potentially dangerous product recalls.

5. Since coming to Public Justice in 2014, I have continued to prosecute class actions on behalf of both consumers and workers. On March 2, 2016, I was part of a team that obtained class certification in *Kearney v. Direct Buy Associates, Inc.*, Case No.: BC539094 (Judge Berle) in Los Angeles County Superior Court, a case involving a company that illegally sold Vehicle Service Contracts online without a license and then routinely refused to honor valid claims for repair made under those contracts. And on May 17, 2018, Judge Freeman of Los Angeles County Superior Court granted final approval of a class settlement, as well as a request for attorneys' fees and costs, in *Campos v. California Cartage Co., LLC*, Case No.: BC570310, a case on behalf of a class of over 100 port truck drivers asserting claims for unpaid wages and business expenses under the California Labor Code where I was among counsel for the class.

6. In my nearly four years with Public Justice, I have also focused my practice on opposing motions to compel arbitration, and have won appellate decisions on that topic in four federal appellate courts: *Goodwin v. Branch Banking & Trust Co.*, 699 Fed. Appx. 274 (4th Cir. 2017), *Messina v. North Central Distributing, Inc.*, 821 F.3d 1047 (8th Cir. 2016), *Dang v. Samsung Electronics Co., Ltd.*, 673 Fed. App'x 779 (9th Cir. 2017), and *Hurst v. Monitronics Int'l, Inc.*, 682 Fed. Appx. 743 (11th Cir. 2017); and two state appellate courts: *Cain v. Midland Funding, LLC*, 156 A.3d 807 (Md. 2017) and *Midland funding, LLC v. Bordeaux*, 147 A.3d 885 (N.J. App. Div. 2016).

7. While Public Justice's work in this case principally involved opposing one motion, the motion was unusually complex because it involved the law of five different states and the interplay between various contract documents presented to five distinct plaintiffs in the course of their vehicle purchase transactions. Moreover, this work occurred in June and July of 2016, and to date we have received no compensation for our efforts in the case.

8. Public Justice attorneys have kept contemporaneous time records of the work performed on this litigation, which are attached to this declaration as Exhibit A. Before submitting

our time records to the Court, I reviewed the records and deducted time totaling 6.7 hours, or 9.1% of the total, in an exercise of billing judgment. The resulting time records, with reductions included, total 66.80 hours of work performed by two attorneys, Karla Gilbride and Leslie Bailey.

The major tasks in which Public Justice attorneys have been involved are as follows:

- a. Discussions with co-counsel preparatory to formally joining the case regarding the legal issues posed by Honda's motion to compel arbitration, the scope of Public Justice involvement in the case, and specific co-counsel arrangements;
- b. Legal research into the equitable estoppel caselaw of California, Florida, Massachusetts, Michigan and Oregon, the states of residence of the five plaintiffs against whom Honda sought to compel arbitration;
- c. Reviewing dealership sales contracts and other documents in the record regarding the five plaintiffs against whom Honda sought to compel arbitration, and conversations with co-counsel at the Gibbs Law Group regarding those plaintiffs' experiences with the dealerships and with Honda's manufacturer's warranty;
- d. Legal research into Sixth Circuit cases involving the Magnuson-Moss Warranty Act and the Federal Arbitration Act, and comparing those decisions to opinions on the interaction of those two federal statutes from other circuits;
- e. Drafting the opposition brief to Honda's motion to compel arbitration; incorporating feedback from co-counsel regarding which cases to emphasize; and refining the brief to fit within the applicable page limit along with co-counsel from Gibbs Law Group;
- f. Consulting with co-counsel periodically on progress of settlement discussions; reviewing preliminary approval motion and related documents.

9. The time spent on this case by the Public Justice attorneys who are counsel of record on this case, Karla Gilbride and Leslie Bailey, applying current hourly rates, is as follows. The time of junior attorneys and legal interns was not included in this summary:

<b>TIMEKEEPER</b>	<b>HOURS</b>	<b>RATE</b>	<b>LODESTAR</b>
Karla Gilbride	<b>66.30</b>	<b>\$685</b>	<b>\$45,415.50</b>
Leslie Bailey	0.50	\$730	\$365.00
<b>TOTALS</b>	66.80		<b>\$45,780.50</b>

10. I have reviewed the time records included in Exhibit A and summarized above, and I affirm that they are true and accurate. In my professional judgment as an attorney with over 10 years' experience litigating class actions, it is my opinion that the time and expenses reported herein were reasonable and necessary for vigorous prosecution of this case on behalf of Plaintiffs and the class.

I declare the above to be true and correct under penalty of perjury of the laws of the District of Columbia. Executed in Washington, D.C., on the date indicated below.

Dated: July 10, 2018



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Karla Gilbride

Karla Gilbride (Cal. SB#264118)  
1620 L Street NW, Suite 630  
Washington, DC 20036  
Telephone: 202-797-8600  
Facsimile: 202-232-7203  
Email: [KGilbride@publicjustice.net](mailto:KGilbride@publicjustice.net)

Counsel for Plaintiffs

# EXHIBIT A



<u>Date</u>	<u>Attorney</u>	<u>Activity</u>	<u>Description</u>	<u>Time</u>
6/16/2016	K. Gilbride	Review	Review motion to compel in Honda MDL and exchange e-mails with Leslie Bailey and Dave Stein re same	1.80
6/17/2016	K. Gilbride	Review	Review Ohio Honda MDL complaint and motion to dismiss opposition	1.30
6/17/2016	K. Gilbride	Telephone call	Phone conversation with David Stein re potential involvement in Honda vibration MDL; exchange e-mails with Paul Bland and Leslie Bailey re same	0.70
6/23/2016	K. Gilbride	Correspondence	Exchange e-mails with David Stein re Honda MDL and motion to compel arbitration	0.10
6/24/2016	K. Gilbride	Telephone call	Phone conversation with Dave Stein and Eric Gibbs re joining Honda MDL as co-counsel on arbitration issues; e-mail exchange with Paul Bland and Leslie Bailey re same	0.40
6/24/2016	K. Gilbride	Coop Atty Agr	Draft co-counsel agreement for In re American Honda Motors Co. CR-V Vibration Marketing and Sales Practices Litigation and send to Eric Gibbs and Dave Stein for review	0.80
6/29/2016	K. Gilbride	Coop Atty Agr	Review revisions to co-counsel agreement for Honda CR-V Vibration MDL made by Dave Stein and exchange e-mails with Paul Bland and Vicky Ni re same	0.30
6/30/2016	K. Gilbride	Telephone call	Phone conversation with Dave Stein re Honda CR-V Vibration MDL briefing	0.30
7/4/2016	K. Gilbride	Review	Review motion to compel and exhibits in Honda MDL and exchange e-mails with co-counsel re questions about individual contracts	6.70
7/5/2016	K. Gilbride	Legal Research	Review cases on Magnuson-Moss Warranty Act and arbitration for Honda MDL	2.80
7/6/2016	K. Gilbride	Correspondence	Exchange e-mails with David Stein re Honda MDL opposition brief	0.10
7/9/2016	K. Gilbride	Brief	Research equitable estoppel caselaw and prepare opposition brief in Honda MDL	3.40
7/10/2016	K. Gilbride	Brief	Prepare Honda MDL opposition brief and e-mail Dave Stein re brief status	4.50
7/11/2016	K. Gilbride	Brief	Prepare opposition to motion to compel for Honda MDL; exchange e-mails with David Stein re same	5.80
7/12/2016	K. Gilbride	Correspondence	Exchange e-mails with David Stein re client declarations and warranty booklet	0.40
7/12/2016	K. Gilbride	Review	Review warranty materials for Honda MDL	0.60
7/12/2016	K. Gilbride	Brief	Prepare opposition to motion to compel in Honda MDL	5.10

7/13/2016	K. Gilbride	Telephone call	Phone conversation with Caroline Corbitt and David Stein re client declarations and brief progress	0.60
7/13/2016	K. Gilbride	Miscellaneous	Review pro hac vice form and exchange e-mails with Caroline Corbitt and Yvonne Stewart re same	0.30
7/13/2016	K. Gilbride	Brief	Prepare Honda MDL opposition to motion to compel; review relevant warranty materials	5.30
7/14/2016	K. Gilbride	Brief	Prepare Honda MDL opposition to motion to compel	12.50
7/14/2016	K. Gilbride	Correspondence	Exchange e-mails with Dave Stein, Eric Gibbs and Caroline Corbitt re revisions to brief; phone conversation with Dave Stein re finalizing brief	0.60
7/14/2016	K. Gilbride	Brief	Review and revise opposition to motion to compel	6.00
7/15/2016	K. Gilbride	Brief	Prepare opposition to motion to compel arbitration in Honda MDL	3.10
7/15/2016	K. Gilbride	Brief	Review edits to Honda MDL opposition and finalize for filing; exchange e-mails with co-counsel re edits to brief	2.10
8/9/2016	K. Gilbride	Review	Review pretrial order	0.10
8/16/2016	K. Gilbride	Correspondence	Exchange e-mails with co-counsel re settlement discussions	0.10
9/9/2016	K. Gilbride	Review	Review agenda for status conference	0.10
5/21/2018	K. Gilbride	Review	Review order granting preliminary approval to class settlement	0.40
<b><u>Total Hours - Karla Gilbride</u></b>				<b><u>66.30</u></b>
<b><u>Total Fees - Karla Gilbride</u></b>				<b><u>\$45,415.50</u></b>
6/14/2016	L. Bailey	Correspondence	review and forward email from Dave Stein, inquiry	0.10
6/17/2016	L. Bailey	Correspondence	email to KG re Dave Stein case	0.20
6/24/2016	L. Bailey	Correspondence	KG re working with Gibbs & Stein on new case	0.20
<b><u>Total Hours - Leslie Bailey</u></b>				<b><u>0.50</u></b>
<b><u>Total Fees - Leslie Bailey</u></b>				<b><u>\$365.00</u></b>
<b><u>GRAND TOTAL - HOURS</u></b>				<b><u>66.80</u></b>
<b><u>GRAND TOTAL - FEES</u></b>				<b><u>\$45,780.50</u></b>

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

In re: American Honda Motor Co., Inc.,	:	Case No.: 2:15-md-2661
CR-V Vibration Marketing and Sales	:	
Practices Litigation	:	
	:	Judge Michael H. Watson
	:	Magistrate Judge Deavers
This document relates to: ALL CASES	:	

**AFFIDAVIT OF KEITH W. SCHNEIDER, ESQ. IN SUPPORT OF THE  
REASONABLENESS OF ATTORNEY'S FEES AND RELATED EXPENSES**

STATE OF OHIO  
COUNTY OF FRANKLIN, SS:

Keith W. Schneider, being first duly cautioned and sworn, deposes, states and declares the following, to wit;

1. I am licensed to practice law in the States of Ohio, Florida and the United States District Court for the Southern District of Ohio, Eastern Division, 6<sup>th</sup> Circuit Court of Appeals and all three Districts in Florida including the 11<sup>th</sup> Circuit Court of Appeals.
2. I am a partner of the law firm of Maguire Schneider Hassay, LLP. I have practiced law in central Ohio for nearly 30 years, including matters before this Court.
3. I make this declaration upon my personal review of both the declarations of David Stein and Mark H. Troutman in support of attorney's fees and costs.
4. I have also reviewed in detail itemized billing statements for the Gibbs Law Group, LLP and Isaac Wiles Burkholder, & Teetor LLC, which both law firms billed in 10<sup>th</sup> of an hour increments with detailed itemization for each entry. Finally, I have reviewed the significant pleadings in this case, namely: the original Complaint, Second Consolidated

Amended Complaint, Plaintiff's Motion and Reply Motion to Transfer, Defendant's Motion to Dismiss and Motion to Compel Arbitration, and subsequent memorandum in opposition or Reply; the responses to some of the Defendant's propounded discovery on the class members and the Stipulation and Release and Plaintiff's Unopposed Motion for Preliminary Approval of Class Settlement.

5. In particular, I find that the rates of both law firms reasonable and consistent with the respective attorneys training, background, experience and skill associated with large, multi-district consumer class actions.
6. I find the hours totaling 1,799.06, with a lodestar fee of \$935,426 and a blended rate of \$520.00 of the Gibbs Law Group, LLP to be commensurate with, if not likely lower than what other nationwide firms in other jurisdictions charge for the same or similar work. The billing rates are comparable to non-contingent billing rates charged by other attorneys performing work in complex litigation and/or comparable to rates found in surveys by the National Law Journal.
7. Additionally, Isaac Wiles hours of 730.30 and a lodestar fee of \$310,645.50 is also consistent for the Southern District of Ohio and in particular, billing rates that have been approved by this Court in prior decisions.
8. Based upon the declarations and a review of each firm's resume, it is established that the billing attorneys are experienced in consumer class action cases. Additionally, I have known and am aware of the Isaac Wiles attorney's skill set, experience and reputation being in practice in Ohio and having once clerked in this honorable Court.
9. The value of the attorney's fees benefitted the entire class; societal stakes have been achieved, and this Court should reward these attorneys that provide such benefits in

order to maintain incentive to others; these fees were undertaken on a contingent fee basis; the value of the services and the hourly rate are established on a hourly basis; and, as previously mentioned, these rates and calculations are both reasonable and necessary based upon the professional skill and legal standing and experience of the counsel this court appointed to represent the class as a whole.

10. Based on my knowledge of and experience with class actions, I find that, reviewing the time entry descriptions provided to me, the work performed by Lead Counsel and Liaison Counsel on behalf of the class was necessary and reasonable. In reaching this conclusion, I am crediting the reasonable discretion of the attorneys involved and their billing judgment.
11. I have reviewed the time records provided to me for the Donovan, Bell, Waddell, and Mendel law firms and their co-counsel. It is my understanding that only time and expenses are requested for work performed for the benefit of their class, such as communication with class representatives and searching for an expert. I find that as a general matter these are compensable activities.
12. I have also reviewed the Public Justice time records provided to me for Karla Gilbride and Leslie Bailey. I find that the work performed associated with the arbitration-issue briefing is a compensable activity performed for the benefit of the class. In reviewing the Declaration of Karla A. Gilbride and the detailed time entries billed in tenth of an hour increments, I believe the time and the lodestar spent to be reasonable and necessary on the underlying compelling issues in Honda's Motion to Compel Arbitration for which Public Justice P.C. has much experience and knowledge in that area.

13. This declaration is made under the penalty of perjury, according to the laws of the United States of America and that the foregoing is true and correct. Executed on July 10<sup>th</sup>, 2018 in Columbus, OH.

FURTHER AFFIANT SAYETH NAUGHT.

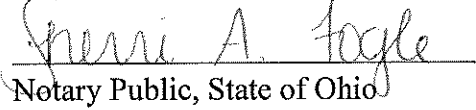


Keith W. Schneider

Sworn to before me and subscribed and in my presence this July 10, 2018.



Sherri A. Fogle  
Notary Public-State of Ohio  
My Commission Expires  
November 20, 2021



Notary Public, State of Ohio

**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

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**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION  
FOR ATTORNEY'S FEES AND EXPENSE REIMBURSEMENTS**

Plaintiffs have filed a motion for attorney's fees and expense reimbursement, which Defendant Honda opposes. The Court has read and considered all papers filed and proceedings had and otherwise being fully informed in the premises and good cause appearing therefor, finds there is sufficient basis for granting final approval of the settlement.

The Court now **GRANTS** Plaintiffs' motion and makes the following findings and orders:

1. Rule 23(h) of the Federal Rules of Civil Procedure provides that the Court may award reasonable attorney's fees and nontaxable costs that are authorized by law.
2. Attorney's fees and nontaxable costs are authorized to prevailing parties by the Magnuson-Moss Warranty Act, 15 U.S.C. § 2310(d)(2), and by the law of Plaintiffs' home states, including: Cal. Civil Code § 1780(e); Cal. Code Civ. Proc. § 1021.5, Colo. Rev. Stat. § 6-1-113(2)(b); Fla. Stat. Ann. § 501.2105; 815 Ill. Comp. Stat. Ann. § 505/10a(c); Me. Rev. Stat. Ann. tit. 5 § 213(2); Mass. Gen. Laws ch. 93A, § 9(4); Mich. Comp. Laws Ann. § 445.911(2); N.Y. Gen. Bus. Law §§ 349(h), 350-e(3); Ohio Rev. Code § 1345.09(F); Or. Rev. Stat. §

646.638(3); R.I. Gen. Laws § 6-13.1-5.2(d); Tex. Bus. & Com. Code § 17.(50(d); Va. Code Ann. § 59.1-204(B); Wash. Rev. Code § 19.86.090.

3. The Court finds that Plaintiffs are prevailing parties by virtue of the relief obtained for class members through the class settlement, approved by this Court as fair reasonable and adequate, and are therefore eligible for an award of fees and expense reimbursement under the above-cited fee-shifting laws.

4. The Court elects to use the lodestar method to calculate a reasonable fee to award Plaintiffs, as there is no common fund from which attorneys' fees can be paid and the lodestar method better serves the purpose of fee-shifting statutes, which are intended to "induce a capable attorney to take on litigation that may not otherwise be economically viable." *Gascho v. Glob. Fitness Holdings, LLC*, 822 F.3d 269, 280 (6th Cir. 2016).

5. To calculate Plaintiffs' counsel's lodestar, the Court multiplies the number of hours reasonable expended on the case by the attorney's reasonable hourly rate. *Amos v. PPG Indus., Inc.*, No. 2:05-CV-70, 2015 WL 4881459, at \*9 (S.D. Ohio Aug. 13, 2015).

6. Class Counsel reports that Plaintiffs' counsel have expended 2,636 hours in connection with this litigation, and that in the exercise of billing discretion they have already reduced their time by more than 15%.

7. The Court has reviewed the documentation provided by Class Counsel to support their reported hours, which includes (i) an overview of their work in the case; (ii) a detailed list of the major tasks accomplished at each stage in the litigation; (iii) a breakdown of their hours by timekeeper for each phase of the litigation; (iv) each timekeeper's daily time records, and (v) an affidavit from Keith W. Schneider, Esq., who has personally reviewed these materials and opined as to their reasonableness.



8. The Court finds that the 2,636 hours reported by Class Counsel were reasonably expended in the prosecution of this litigation and will use that number to calculate Class Counsel's lodestar.

9. The Court also finds that the proposed hourly rates are reasonable and consistent with the market rate for attorneys and paralegals or comparable skill and experience in the community. As this multi-district litigation is national in scope, the Court finds that the applicable market is the national market for complex class action litigation.

10. Accordingly, the Court finds that the lodestar value of the professional services provided over the three-year duration of this litigation is \$1,313,674

11. The Court has reviewed the breakdown of \$55,100.08 in expenses provided by Class Counsel and finds those expenses to be reasonably-incurred in the prosecution of this multi-district litigation.

12. Class Counsel has requested that the Court award a fee multiplier only to the extent the Court finds it necessary to compensate them appropriately for their efforts or for advancing litigation expenses on behalf of the Settlement Class.

13. The Court finds that \$1,368,774.08 will reasonably and fairly compensate Class Counsel and accordingly awards Class Counsel \$1,368,774.08 in attorney's fees and costs.

14. Pursuant to the Class Settlement, ¶ 10.4, Defendant Honda is ordered to make payment to Class Counsel within the later of either 14 days after the Settlement's Effective Date or Honda's receipt of wiring instructions and valid W-9s from Class Counsel.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. MICHAEL H. WATSON  
United States District Court Judge