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10 *Co-Lead Counsel for Plaintiffs*

11
12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA
14

15 *In re ZF-TRW Airbag Control Units*
Products Liability Litigation

16 ALL CASES AGAINST THE
17 HYUNDAI-KIA AND MOBIS
18 DEFENDANTS

MDL No. 2905

Judge: John A. Kronstadt

**HYUNDAI-KIA PLAINTIFFS’
MOTION FOR FINAL APPROVAL
OF CLASS SETTLEMENT, AND
AWARD OF ATTORNEYS’ FEES,
EXPENSES, AND SERVICE
AWARDS TO SETTLEMENT CLASS
REPRESENTATIVES**

Date: September 29, 2025

Time: 8:30 a.m.

Dept.: Courtroom 10C

NOTICE OF MOTION AND MOTION

TO ALL THE PARTIES AND COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on September 29, 2025 at 8:30 a.m., or at such other date and time as the Court may set, in Courtroom 10C of the United States District Court for the Central District of California, Settlement Class Counsel, on behalf of a proposed Settlement Class of owners and lessees of certain Hyundai-Kia vehicles, will and hereby do move the Court for an order and judgment granting final approval of the Class Action Settlement and the motion for attorneys' fees, costs, and service awards, and appointing Settlement Class Counsel and Settlement Class Representatives under Fed. R. Civ. P. 23(g)(1).

This Motion is based on:¹

- 1) this Notice of Motion and Motion;
- 2) the Memorandum of Points and Authorities below;
- 3) the Joint Declaration of Co-Lead Counsel and exhibits thereto, filed concurrently herewith;
- 4) the Declaration of Jennifer Keough, filed concurrently herewith;
- 5) the Declaration of Kirk D. Kleckner, filed concurrently herewith;
- 6) the records, pleadings, and papers filed, and documents produced in, this litigation; and
- 7) such other documentary and oral evidence or argument as Settlement Class Counsel may present to the Court at the hearing of this Motion.

¹ Plaintiffs will submit a proposed order with their Reply brief, to be filed September 28, 2025, so as to reflect the ongoing settlement claims statistics and to respond to objections, if any.

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 When the Court granted preliminary approval of the proposed Settlement
4 with the Settling Defendants,² it found both that “[a] consideration of the applicable
5 factors demonstrates that the Settlement is sufficiently fair, reasonable and
6 adequate” and that “the Class should be conditionally certified for the purpose of
7 settlement.” ECF 1036 (“Prelim. Order”) at 16, 22. Nothing has changed to alter
8 those reasoned conclusions in the three months since that Order, and for those same
9 reasons, the Court should finally approve the Settlement.

10 With the Court’s final approval of the Settlement, the Settlement Class of
11 owners and lessees of some 3.7 million Hyundai-Kia Subject Vehicles will receive
12 certain, substantial relief after six years of litigation. The Settlement benefits track
13 those this Court finally approved in the settlement with Toyota earlier in this
14 litigation, and the same outcome remains appropriate here. *See In re ZF-TRW*
15 *Airbag Control Units Prods. Liab. Litig.*, No.19-ML-02905 JAK MRW(x), 2023
16 WL 9227002 (C.D. Cal. Nov. 28, 2023) (“*In re ZF-TRW ACUs Toyota Final App.*”).
17 As with Toyota, the Hyundai-Kia Settlement provides a comprehensive package of
18 benefits to address the alleged harms and interests of Settlement Class members,
19 including a non-reversionary \$62.1 million Settlement Amount and additional, non-
20 monetary relief, including a 10-year Inspection Program and a New Parts
21 Warranty—the latter of which a leading expert has opined to provide at least
22 \$13,600,000 in additional value to the Settlement Class, plus substantially more in
23 the event of a future recall. *See* Declaration of Kirk D. Kleckner (“Kleckner Decl.”)
24 at ¶¶ 2, 6(f), 8(f). This is a strong—and tailored—resolution for the Settlement
25 Class members and their claims.

26 Settlement Class Counsel worked tens of thousands of hours and advanced

27 _____
28 ² Capitalized terms not defined herein have the same definitions and meanings used
in the Settlement Agreement. ECF 1027-1.

1 significant expenses on a purely contingent basis to get to this result. To fairly
2 compensate them for their investment of time, money, and risk, Settlement Class
3 Counsel seek \$20,093,033.30 in attorneys’ fees plus reimbursement of \$400,000 in
4 reasonable costs. As described in detail below, the requested fees are approximately
5 26.5% of the Settlement’s conservative calculable value to the Settlement Class.
6 The fees requested are an even lower percentage (15.9%) of the Settlement’s total
7 value to the Settlement Class, which includes the calculable value of the
8 Defendants’ commitment to provide a New Parts Warranty for Unrecalled Vehicles
9 in the event of a future recall, plus additional, unquantified value provided through
10 the Inspection Program.

11 The requested award finds firm support in precedent and practice in this
12 multidistrict litigation and in this Circuit, wherein “[d]istrict courts . . . routinely
13 award attorneys’ fees that are one-third of the total settlement fund . . . [and] [s]uch
14 awards are routinely upheld by the Ninth Circuit.” *Hernandez v. Dutton Ranch*
15 *Corp.*, No. 19-CV-00817-EMC, 2021 WL 5053476, at *6 (N.D. Cal. Sept. 10,
16 2021); *see also e.g., In re ZF-TRW ACUs Toyota Final App.*, 2023 WL 9227002, at
17 *15 (holding an award of 32.4% (excluding warranty value) was reasonable in the
18 circumstances of this litigation); ECF 1039 (“*In re ZF-TRW ACUs Mitsu Final*
19 *App.*”) (approving fee award of 29.4% based on a “favorable and valuable outcome
20 for the Class and . . . significant work on behalf of the Class.”)³

21 A lodestar cross-check yields a multiplier of 2.0 (or 1.92 with future time),
22 which falls on the low end of the “presumptively acceptable” range of 1.0-4.0 in the
23 Ninth Circuit. This further confirms the reasonableness of the fee request. *See* §
24 IV.A.5.d. Settlement Class Counsel also seek a reasonable award of \$2,500 for each
25 Settlement Class Representative in recognition of their important service to the
26 Settlement Class and this litigation.⁴

27 ³ Internal citations are omitted throughout unless otherwise indicated.

28 ⁴ The “Settlement Class Representatives” or “Hyundai-Kia Plaintiffs” are Larae

Footnote continued on next page

1 For these reasons, Plaintiffs respectfully ask for the Court to certify the
2 Settlement Class and to finally approve the Settlement, the request for reasonable
3 attorneys' fees and expenses, and the \$2,500 service awards for the Settlement
4 Class Representatives for their dedication to this important case.

5 **II. BACKGROUND**

6 The Court is well acquainted with the history of this litigation, much of
7 which is detailed in Plaintiffs' preliminary approval materials and in the Court's
8 Preliminary Approval Order. *See* ECF 1017 at 3-7; ECF 1036 ("Prelim. Order") at
9 1-3, 18-19. Plaintiffs incorporate those materials by reference and provide the
10 following summary of key points.

11 **A. The Settlement provides substantial compensation to Hyundai-Kia**
12 **Class members.**

13 The Settlement secures substantial and valuable benefits for the Settlement
14 Class. It includes \$62.1 million in cash and commitments, consisting of a \$48.6
15 million cash fund, plus the Settling Defendants' obligations to:

- 16 (1) spend \$3.5 million on a robust Outreach Program to increase Recall
17 participation and improve Subject Vehicle safety (SA § III.G)
18 (2) offer a Future Rental Car Reimbursement, Loaner Vehicle and Outreach
19 Program to minimize inconvenience to complete repairs in the open
20 Recall, and to continue those efforts in the event of a future recall of the
21 Unrecalled Vehicles (SA § III.H).

22 These latter commitments are reasonably estimated to provide \$10 million in
23 additional value for the Settlement Class. *See* ECF 1031 and 1031-1 (the Settling
24 Defendants' supplemental filing and data on the cost of these two programs).

25 _____
26 Angel, Bobbi Jo Birk-LaBarge, John Colbert, Brian Collins, Gerson Damens,
27 Bonnie Dellatorre, Dylan DeMoranville, Joseph Fuller, Tina Fuller, Lawrence
28 Graziano, Michael Hernandez, Kinyata Jones, Diana King, Richard Kintzel, Carl
Paul Maurilus, Kenneth Ogorek, Burton Reckles, Dan Sutterfield, Amanda
Swanson, and Lore Van Houten.

1 In addition, the Settlement provides a long-term (10 year) New Parts
2 Warranty for any Settlement Class member who obtains a recall repair for a
3 Recalled Vehicle. SA § III.F. Economist Kirk Kleckner has calculated the value of
4 the New Parts Warranty at \$13.6M for Settlement Class members with Recalled
5 Vehicles, and a prospective value of \$50.3M for Settlement Class members with
6 Unrecalled Vehicles. Kleckner Decl. ¶¶ 6(f), 8(f).⁵ Mr. Kleckner’s valuations have
7 been accepted by this Court and others in comparable automotive class action
8 settlements. *See, e.g.*, ECF 843 (considering Kleckner’s warranty valuation in
9 connection with the Toyota settlement); *In re Volkswagen & Audi Warranty*
10 *Extension Litig.*, 89 F. Supp. 3d 155, 169 (D. Mass. 2015) (accepting Kleckner’s
11 warranty valuations); *In re Toyota Motor Corp. Unintended Acceleration Mktg.*,
12 *Sales Practices, & Prods. Liab. Litig.*, No. 810 ML 02151J VSF MOX, 2013 WL
13 12327929, at *9 n.10 (C.D. Cal. July 24, 2013) (finding Kleckner’s warranty
14 valuation to be “both reliable and relevant”).⁶

15
16 ⁵ Differentiating factors that affected Mr. Kleckner’s valuation of the New Parts
17 Warranty for this settlement compared to the Toyota Settlement include: the
18 number of vehicles recalled and thus eligible for the warranty without a future
19 recall (2.8 million for Toyota, and 1.1 million for Hyundai-Kia), and the relative
20 age of the vehicles (Recalled Vehicles for Hyundai-Kia continue up through model
21 year 2013, whereas Toyota’s recall includes up to model year 2018 vehicles). Given
22 the difference in model years, Mr. Kleckner estimated that a higher percentage of
the Toyotas remained on the road, particularly at the time of his valuation two years
ago in 2023 which was relatively closer in time to the most recent model year
included. *See* Kleckner Decl. at Exh. D.

23 ⁶ *See also In re Takata Airbags Prods. Liab. Litig.*, No. 15-MD-2599 (S.D. Fla.),
24 ECF 2162 (order granting motion for final approval of BMW settlement, supported
25 by ECF 2033-2, declaration of Kirk Kleckner), ECF 2385, 2256-4 (same for and
26 Nissan settlements); ECF 3121 (order denying motion to exclude testimony of Kirk
27 Kleckner on warranty valuation). *In re Chrysler-Dodge-Jeep Ecodiesel Mktg., Sales*
28 *Practices, & Prods. Liab. Litig.*, No. 17-MD-02777-EMC, 2019 WL 2554232, at *1
(N.D. Cal. May 3, 2019); ECF 561 (order granting motion for final approval of
settlement, supported by ECF 491-4, declaration of Kirk Kleckner on warranty
valuation).

1 Finally, the Settlement also creates an innovative ten-year-long Settlement
2 Inspection Program that benefits all Settlement Class members by establishing
3 mandatory procedures to actively investigate and document airbag non-
4 deployments that may be caused by the ACU Defect at issue in this case. SA § III.E
5 and Exhibit 3.

6 Importantly, the Settlement is non-reversionary. Any remaining funds, after
7 all valid and timely claims are paid, will be distributed to Settlement Class
8 members unless and until it is not feasible to do so. Otherwise, remaining funds will
9 be distributed to appropriate *cy pres* recipients, subject to Court approval when and
10 if that arises. SA § III.C.2. This means that *all* the cash secured by the Settlement
11 will inure to the benefit of the Settlement Class and the interests advanced in this
12 litigation.

13 **B. The Case was complex, risky, and thoroughly investigated.**

14 The favorable result here was not easily obtained, as evidenced in part by the
15 *six-plus years* of litigation leading up to this motion for final settlement approval.

16 The case against the Settling Defendants presented a unique set of facts and
17 complex issues and challenges. It stems from a 2015 NHTSA investigation into ZF-
18 TRW's DS84 ACUs, which expanded to include Hyundai and Kia in 2018. ACAC
19 ¶¶ 1259, 1383, 1386, 1412, 1427. In sum, Plaintiffs alleged that the Settling
20 Defendants misled them about problems in their vehicles and their airbag control
21 units (ACUs), thereby causing economic damages when Plaintiffs paid for vehicles
22 with a hidden and material safety defect.

23 Over the past six years, Settlement Class Counsel have conducted extensive
24 investigation, litigation, and discovery of the complex science, technology, and
25 legal issues that underlie these allegations. After formation of this MDL, Plaintiffs
26 filed a 564-page Consolidated Complaint asserting claims against six vehicle
27 manufacturer groups and three supplier groups, a total of *twenty-nine* Defendants—
28 including four Hyundai and Kia entities and Hyundai Mobis. *See* ECF 119.

1 On July 27, 2020, the Settling Defendants filed motions under Rule 12(b)(2)
2 and 12(b)(6) to dismiss the Consolidated Complaint. ECF 219, 220. They also
3 joined Defendants’ 50-page Joint Motion to Dismiss. ECF 208. Plaintiffs filed
4 approximately 115 pages of extensive, consolidated opposition briefs (ECF 281,
5 282, 285, 286), the Settling Defendants then replied (ECF 298, 299, 300, 303), and
6 this Court held a hearing on January 25, 2021. ECF 323. The Court issued its ruling
7 on February 9, 2022, granting Hyundai Mobis’s motion, granting in part and
8 denying in part the Hyundai and Kia Defendants’ motion and the Joint Motion, and
9 ordered Plaintiffs to file the Amended Consolidated Class Action Complaint
10 (“ACAC”). ECF 396.

11 On May 26, 2022, Plaintiffs filed their three-volume, 1,335-page ACAC. The
12 ACAC reflects their extensive investigation into the technology, components,
13 electrical properties, and other issues related to the ACU Defect. It also includes
14 detailed evidence of Defendants’ knowledge of the ACU Defect, which Plaintiffs
15 gained through years of litigation, discovery, independent investigation and expert
16 analysis. ECF 477.

17 The Settling Defendants filed motions under Rule 12(b)(2) and 12(b)(6) to
18 dismiss the ACAC. ECF 529, 682.⁷ They also joined Defendants’ 50-page Joint
19 Motion to Dismiss. ECF 530. Plaintiffs filed approximately 130 pages of
20 consolidated opposition briefs (ECF 581, 584, 718), the Settling Defendants then
21 replied (ECF 610, 612, 755), and this Court held a hearing on January 23, 2023.
22 ECF 655. The Court has not yet ruled on the motions.

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⁷ The Hyundai and Kia Defendants’ motions to dismiss were delayed due to ongoing settlement discussions at the time the majority of Defendants filed their motions. Those discussions were put on hold while the other Parties were filing briefs, and the Hyundai and Kia Defendants joined the briefing. *See* ECF 680.

1 Alongside these extensive briefing efforts, the Parties⁸ also engaged in
2 discovery and information exchanges, which included detailed requests for
3 production to the Hyundai and Kia entities and jurisdictional discovery requests to
4 their Korean parent companies, as well as jurisdictional discovery to Hyundai
5 Mobis. The Parties met and conferred about this discovery and other topics in
6 detail, including the Hyundai and Kia Defendants’ collection and sources of ESI.
7 Co-Lead Decl. ¶ 3. Some of these discovery disputes culminated in motion
8 practice—Plaintiffs and Hyundai Motor Co., Ltd. briefed for the Court Plaintiffs’
9 request for a case management order setting discovery deadlines, which the Court
10 granted in part and denied in part. ECF Nos. 932, 940, 942, 957, 958. As a result of
11 Plaintiffs’ discovery efforts, the Settling Defendants produced, and Plaintiffs
12 reviewed, nearly 250,000 pages of relevant documents. *Id.* ¶ 27.

13 In parallel, Plaintiffs also engaged in extensive discovery with the ZF-TRW
14 Defendants and the ST Defendants to develop their understanding of the ACU
15 Defect in Hyundai-Kia Subject Vehicles. To date, the ZF-TRW and ST Defendants
16 have produced more than three million pages of documents. These documents
17 provide important insights and technical details on the DS84 ACUs, the DS84
18 ASICS, the alleged defect therein, and the Settling Defendants’ and the other
19 Defendants’ knowledge of the same. *Id.* ¶ 4.

20 The Court appointed Patrick A. Juneau as Settlement Special Master pursuant
21 to Fed. R. Civ. P. Rule 53 after Plaintiffs filed their ACAC. ECF 493. Thereafter,
22 the Parties also commenced a series of settlement discussions and related
23 information exchanges that facilitated nearly three years of difficult and detailed
24 negotiations, culminating in the Settlement now before the Court for approval.

25
26
27 ⁸ Reference to the “Parties” herein refers to the settling parties only, the Settling
28 Defendants and the Hyundai-Kia Plaintiffs; the Settlement does not create
obligations for or release the remaining Defendants.

1 **III. ARGUMENT**

2 **A. The Settlement is fair, reasonable, and adequate.**

3 A “district court’s task in reviewing a settlement is to make sure it is ‘not the
4 product of fraud or overreaching by, or collusion between, the negotiating parties,
5 and that the settlement, taken as a whole, is fair, reasonable and adequate to all
6 concerned.’” *In re Volkswagen “Clean Diesel” Mktg., Sales Practices, & Prods.*
7 *Liab. Litig.*, 895 F.3d 597, 617 (9th Cir. 2018) (quoting *Officers for Justice v. Civ.*
8 *Serv. Comm’n*, 688 F.2d 615, 625 (9th Cir. 1982)). In this evaluation, the court must
9 consider the overall result, “rather than assessing its individual components.” *Lane*
10 *v. Facebook, Inc.*, 696 F.3d 811, 818–19 (9th Cir. 2012) (citing *Hanlon v. Chrysler*
11 *Corp.*, 150 F.3d 1011, 1026 (9th Cir. 1998)).

12 As detailed above, the Settlement provides significant, comprehensive
13 benefits to the Settlement Class. This result, and each Rule 23(e)(2) factor, weigh
14 strongly in favor of final approval. Indeed, the Court held in its Preliminary
15 Approval Order that “[a] consideration of the applicable factors demonstrates that
16 the Settlement is sufficiently fair, reasonable and adequate to warrant preliminary
17 approval.” Prelim. Order at 21. The same conclusions extend to support final
18 approval now.

19 **1. Rule 23(e)(2)(A): Settlement Class Counsel and the**
20 **Settlement Class Representatives have and will continue to**
21 **zealously represent the Class.**

22 Settlement Class Counsel and the Settlement Class Representatives fought
23 hard and remained dedicated to protect the interests of the Class. *See* § II.B, *supra*.
24 That meant six years of investigating, prosecuting, and resolving this action as to
25 the Settling Defendants. *See* Fed. R. Civ. P. 23(e)(2)(A); Prelim. Order at 18
26 (“Counsel have prosecuted this case vigorously since the litigation began in 2019”);
27 *see also In re ZF-TRW ACUs Prods. Liab. Litig.*, No. 19-ML-2905 JAK (MRWx),
28 2023 WL 6194109, at *14 (C.D. Cal. July 31, 2023) (“*In re ZF-TRW ACUs Toyota*
Prelim. App.”) (similar); *In re ZF-TRW Airbag Control Units Prods. Liab. Litig.*,

1 No. 19-ML-2905 JAK, ECF 983 at 16 (“*In re ZF-TRW ACUs Mitsu. Prelim. App.*”)
2 (same).

3 As detailed above, Settlement Class Counsel undertook significant efforts to
4 uncover the facts necessary to advance and refine the Class’ claims. This included
5 pursuing and analyzing millions of pages of discovery relevant to the Hyundai-Kia
6 Plaintiffs’ claims from the Settling Defendants and other Defendants. Plaintiffs also
7 bolstered these efforts through their own investigation and the retention of technical
8 experts, and ultimately reviewed and synthesized a vast corpus of documents and
9 ESI, as reflected in the evidence-based details and extensive factual allegations
10 contained in the 1,300+ page ACAC.

11 Settlement Class Counsel also fielded defensive pleading challenges from
12 every angle—including researching, drafting, and filing approximately 210 pages of
13 extensive opposition briefing in response to Rule 12 challenges, a process that
14 fleshed out the strengths and vulnerabilities of the Hyundai-Kia Plaintiffs’ claims.
15 This positioned Counsel well to evaluate the case against the Settling Defendants
16 and to negotiate a fair and reasonable Settlement. *See Ontiveros v. Zamora*, 303
17 F.R.D. 356, 371 (E.D. Cal. 2014). They have done so.

18 The Settlement Class Representatives are likewise actively engaged. Each
19 has remained dedicated to this litigation for many years. These Representatives
20 universally support the proposed Settlement on behalf of the Class and remain
21 willing to protect the Settlement Class and the Settlement through final approval
22 and until Settlement administration is complete. Co-Lead Decl. ¶ 8. The Settlement
23 Class was and remains well represented.

24 **2. Rule 23(e)(2)(B): The Settlement is the product of good faith,**
25 **evidence-backed, and arm’s-length negotiations.**

26 As the Court observed in granting preliminary approval, the Settlement arose
27 out of intensive negotiations overseen by Court-appointed Settlement Special
28 Master Juneau, and there is “no evidence of fraud, overreaching, or collusion

1 between the parties.” Prelim. Order at 19; *see also In re ZF-TRW ACUs Toyota*
2 *Prelim. App.*, 2023 WL 6194109, at *15 (similar finding with respect to the
3 settlement with Toyota in this litigation); *In re ZF-TRW ACUs Mitsu. Prelim. App.*,
4 ECF 983 at 17 (similar finding with respect to the settlement with Mitsubishi in this
5 litigation); Fed. R. Civ. P. 23(e)(2)(B).

6 Indeed, the record shows the Settlement to be the product of hard-fought,
7 arm’s length negotiations informed by a deep understanding of the case. The Parties
8 engaged in settlement discussions (with a pause to resume motion to dismiss
9 briefing at one point) over some two and a half years—a timeline that reflects the
10 complexity of the issues and the parallel efforts to support negotiations with
11 substantial discovery and investigation.

12 While negotiations were ongoing, and as described above (§ II.B),
13 Defendants produced millions of pages of documents relevant to Plaintiffs’ claims
14 and the ACU Defect. Co-Lead Decl. ¶ 4. The Settling Defendants alone produced
15 nearly 250,000 pages. Settlement Class Counsel reviewed and analyzed these
16 documents, as well as those produced by the other Defendants. *Id.* They also
17 examined additional materials obtained through their own investigative efforts and
18 those of their experts. *Id.* ¶ 5. In addition, Settlement Class Counsel reviewed
19 responses to multiple sets of interrogatories and requests for admission served on
20 multiple Defendants. *Id.*

21 This robust exchange of information and documents demonstrates that the
22 Parties’ negotiations were non-collusive. *See Wahl v. Yahoo! Inc.*, No. 17-CV-
23 02745-BLF, 2018 WL 6002323, at *4 (N.D. Cal. Nov. 15, 2018) (granting final
24 approval of class settlement where the parties had exchanged “sufficient
25 information to evaluate the case’s strengths and weaknesses”); *see also* 4 William
26 B. Rubenstein et al., *Newberg and Rubenstein on Class Actions* § 13:49 (5th ed.
27 2012) (extensive exchange of information shows “the parties have a good
28 understanding of the strengths and weaknesses of their respective cases and hence

1 that the settlement’s value is based upon such adequate information”); *In re Anthem,*
2 *Inc. Data Breach Litig.*, 327 F.R.D. 299, 320 (N.D. Cal. 2018) (discovery gave the
3 parties “a good sense of the strength and weaknesses of their respective cases” and
4 was “indicative of a lack of collusion”); Prelim. Order at 19 (“extensive and
5 meaningful exchange of information [during the arm’s-length negotiations]
6 demonstrates that the parties were well-informed”).⁹

7 Settlement Special Master Juneau’s involvement further confirms the fair and
8 arm’s length nature of the negotiations. “Settlements reached with the help of a
9 mediator are likely non-collusive.” *Kabasele v. Ulta Salon, Cosms. & Fragrance,*
10 *Inc.*, No. 2:21-CV-1639 WBS KJN, 2024 WL 477221, at *4 (E.D. Cal. Feb. 7,
11 2024); *Steinberg v. CoreLogic Credco, LLC*, No. 3:22-CV-00498-H-SBC, 2024 WL
12 1546921, at *8 (S.D. Cal. Apr. 9, 2024) (finding no collusion where “[t]he proposed
13 settlement agreement resulted from significant arm’s length negotiation with the
14 assistance of a private mediator”); *In re ZF-TRW ACUs Mitsu. Prelim. App.*, ECF
15 983 at 17 (noting Special Master Juneau’s opinion that “the outcome . . . is the
16 result of a fair, thorough, and fully-informed arms-length process between highly
17 capable, experienced and informed parties and counsel”); *In re ZF-TRW ACUs*
18 *Toyota Prelim. App.*, 2023 WL 6194109, at *15 (similar).

19 Finally, the Settlement is non-reversionary, and there is no clear sailing or
20 other agreement regarding the requested attorneys’ fees. None of the value secured
21 for the Settlement Class will revert to the Settling Defendants if unclaimed. This,
22 too, shows a lack of collusion and supports approval. *See* Prelim. Order at 19-20; *In*
23 *re ZF-TRW ACUs Mitsu. Prelim. App.*, ECF 983 at 17; *In re ZF-TRW ACUs Toyota*
24 *Prelim. App.*, 2023 WL 6194109, at *16.

25 ⁹ *See also Elder v. Hilton Worldwide Holdings, Inc.*, No. 16-CV-00278-JST, 2021
26 WL 4785936, at *7 (N.D. Cal. Feb. 4, 2021) (“[T]he extent of discovery completed
27 supports approval of a proposed settlement” and shows “both plaintiffs and
28 defendants ha[ve] a clear view of the strengths and weaknesses of their cases.”);
Ontiveros, 303 F.R.D. at 371 (granting final approval where class counsel had
“conducted discovery and non-discovery investigation”).

1 3. **Rule 23(e)(2)(C): The Settlement represents a fair**
2 **compromise for substantial compensation.**

3 As the Court recently acknowledged at the preliminary approval phase, this
4 “litigation could continue for years, with large costs.” Prelim. Order at 21. To
5 instead receive immediate and material benefits now (rather than years from now, if
6 ever) is a principled compromise that works to the clear benefit of the Hyundai-Kia
7 Settlement Class, especially considering (i) the costs, risks, and delay of trial and
8 appeal and (ii) the effectiveness of the proposed distribution plan. *See* Fed. R. Civ.
9 P. 23(e)(2)(C). This Court recently found the same, *see* Prelim. Order at 20-21, and
10 the same conclusion is equally supported again now.

11 a. **The Settlement mitigates the risks, expenses, and**
12 **delays the Class would bear with continued litigation.**

13 The Settlement eliminates future litigation risk, avoids delay, and provides
14 the Settlement Class with “guaranteed timely compensation and benefits.” Prelim.
15 Order at 21. This factor strongly favors final approval. *See In re ZF-TRW ACUs*
16 *Mitsu. Prelim. App.*, ECF 983 at 18 (“Litigation could continue for years, with large
17 associated costs. By contrast, the Settlement provides Settlement Class members
18 with certain and timely relief”); *In re ZF-TRW ACUs Toyota Prelim. App.*, 2023 WL
19 6194109, at *16 (same); *Nobles v. MBNA Corp.*, No. C 06-3723 CRB, 2009 WL
20 1854965, at *2 (N.D. Cal. June 29, 2009) (“The risks and certainty of recovery in
21 continued litigation are factors for the Court to balance in determining whether the
22 Settlement is fair.”) (citing *In re Mego Fin. Corp. Sec. Litig.*, 213 F.3d 454, 458 (9th
23 Cir. 2000) *as amended* (June 19, 2000)); *Kim v. Space Pencil, Inc.*, No. C 11-03796
24 LB, 2012 WL 5948951, at *5 (N.D. Cal. Nov. 28, 2012) (“The substantial and
25 immediate relief provided to the Class . . . weighs heavily in favor of [] approval
26 compared to the inherent risk of continued litigation, trial, and appeal, as well as the
27 financial wherewithal of the defendant.”); *In re Toys “R” Us-Del., Inc.*, 295 F.R.D.
28 438, 453 (C.D. Cal. 2014) (similar); Fed. R. Civ. P. 23(e)(2)(C)(i).

1 As noted above, the Settlement is non-reversionary. It provides significant
2 non-cash benefits to Settlement Class members too, including an Outreach Program
3 to drive Recall participation, a loaner vehicle program to ensure that recall repairs
4 are performed with minimal inconvenience, and a long-term and valuable New
5 Parts Warranty. Finally, all Settlement Class members benefit from the Settlement
6 Inspection Program, which imposes investigation and reporting obligations for field
7 incidents for the next ten years.

8 The compensation secured for Settlement Class members represents a
9 material portion of Plaintiffs' price-premium damages attributable to the Settling
10 Defendants. ACAC ¶ 1456. A precise calculation of these damages will ultimately
11 involve expert testimony at a later stage of the litigation. However, other forms of
12 available data on the value of safety differences in vehicles, while not directly
13 comparable, provide reference points for the general scope of the economic
14 damages due to the ACU Defect. *See* ACAC ¶ 1457 (\$500 price differential for a
15 2011 Jeep Wrangler with and without seat-mounted, front side airbags); ACAC
16 ¶ 1458 (results on conjoint analysis in Takata litigation estimated damages
17 approximately ten percent of vehicle value).¹⁰ The compensation and benefits
18 available under the Settlement offer a material amount of either figure.
19 *Cf.* Prelim. Order at 20 ("It is well-settled law that a cash settlement amounting to
20 only a fraction of the potential recovery will not per se render the settlement
21 inadequate or unfair.") (*quoting Officers for Just.*, 688 F.2d at 628).

22 Importantly, the Settlement benefits reflect just one of three defendant
23 groups, and the Hyundai-Kia Plaintiffs will continue to pursue further damages
24 attributable to the ZF and ST Defendants as well. The recovery obtained from the
25

26 ¹⁰ Plaintiffs' actual damages in this case may, at the appropriate juncture and with
27 expert opinion, differ materially from either or both of these figures. Treble
28 damages, available under RICO, do not traditionally factor into settlement value
assessment. *Rodriguez v. W. Publ'g Corp.*, 563 F.3d 948, 964 (9th Cir. 2009).

1 Settling Defendants is a notable result for the compromise of contested claims
2 against one of several potentially liable defendant corporate families.

3 The Settlement compensation is also well in line with settlements recently
4 approved by this Court and other courts in automotive defect cases in this Circuit
5 and others. *See In re ZF-TRW ACUs Toyota Final App.*, 2023 WL 9227002
6 (approving Toyota settlement that included similar structure of out-of-pocket
7 reimbursements, residual cash payments, and a package of non-monetary benefits);
8 *In re ZF-TRW ACUs Mitsu. Final App.*, ECF 1039 (approving Mitsubishi settlement
9 with payments up to \$250 per vehicle and an Inspection Protocol); *Banh v. Am.*
10 *Honda Motor Co., Inc.*, No. 2:19-CV-05984-RGK-AS, 2021 WL 3468113, at *7
11 (C.D. Cal. June 3, 2021) (“The settlement adequately and fairly compensates class
12 members. They will receive automatic [non-monetary] benefits . . . and they will
13 have the opportunity to file claims for added relief in a streamlined process.”);
14 *Brightk Consulting Inc. v. BMW of N. Am., LLC*, No. SACV 21-02063-CJC (JDEx),
15 2023 WL 2347446, at *2 (C.D. Cal. Jan. 3, 2023) (extended warranty and out-of-
16 pocket costs); *In re Takata Airbag Prods. Liab. Litig.*, No. 14-CV-24009, 2022 WL
17 1669038, at *1 (S.D. Fla. Apr. 4, 2022) (approving Volkswagen settlement as the
18 latest in several similar settlements in the *Takata* MDL).

19 The Hyundai-Kia Plaintiffs firmly believe in the strength of their case and
20 were prepared to proceed through trial. But they also recognize that significant risks
21 ahead. While Plaintiffs believe the ACAC states valid and cognizable claims,
22 including under RICO, several of Plaintiffs’ claims did not survive the initial round
23 of pleading challenges,¹¹ and foreign Defendants Hyundai Mobis and Kia Corp.

24 ¹¹ Just nine of the Hyundai-Kia Plaintiffs’ state law claims survived the earlier
25 pleading challenge: their California Song-Beverly Consumer Warranty Act claim;
26 Florida Deceptive & Unfair Trade Practices Act claim; claims for breach of express
27 and implied warranties under Maryland and Massachusetts law; Maryland
28 Consumer Protection Act claim, Massachusetts Deceptive Acts or Practices claim
(as to Kia Motors America, Inc. only), and Pennsylvania Unfair Trade Practices and
Consumer Protection Law claim. *See* ECF 396 at 128-131, 171-177.

1 were wholly dismissed on jurisdictional grounds. The motions currently pending
2 further illustrate the complexity and technical demands of some of Plaintiffs’
3 claims.

4 Even if the Hyundai-Kia Plaintiffs could overcome these challenges, they
5 would still face an expensive and protracted process to certify a litigation class and
6 prove a multi-year, multi-party fraud through summary judgment and trial. A
7 favorable verdict would almost certainly be followed by years of appeals and
8 relitigation of the same core issues. Resolving the case now represents a principled
9 and practical result that serves the best interests of the Settlement Class.

10 **b. Hyundai-Kia Class members can obtain relief through**
11 **a straightforward claims process.**

12 The Parties, in consultation with the Settlement Notice and Claims
13 Administrator, designed a simple claims process to maximize Settlement Class
14 member participation. Settlement Class members can submit a streamlined Claim
15 Form that takes only a few minutes to complete either online through the
16 Settlement website, or by mail.

17 The Claim Form requests only basic identifying information to confirm
18 eligibility and minimal supporting documentation as necessary (e.g., to verify proof
19 of ownership or lease, or substantiate claimed out-of-pocket costs). *See* ECF 1027-2
20 (Claim Form). This straightforward and fair process for submitting claims and
21 distributing relief meets the requirements of Rule 23(e)(2)(C)(ii) and, as the Court
22 noted, “should be effective in distributing relief to the Class” (Prelim. Order at 21),
23 weighing in further favor of final approval.

24 **c. Settlement Class Counsel seeks reasonable attorneys’**
25 **fees and costs.**

26 Settlement Class Counsel’s reasonable fee request is detailed below (§ IV)
27 but in this context it is worth reiterating that “terms of . . . [the] proposed award of
28 attorneys’ fees” are fair and reasonable, particularly in light of the substantial, non-
reversionary recovery for the Class. *See* Fed. R. Civ. P. 23(e)(2)(C)(iii); *see also*

1 Prelim. Order at 26 (“The evidence submitted in connection with Plaintiffs’ Motion
2 for Preliminary Approval shows that, to date, the amount of attorney’s fees
3 submitted by Plaintiffs’ counsel are within a reasonable range.”)

4 **4. Rule 23(e)(2)(D): The Proposed Settlement treats all**
5 **Hyundai-Kia Class members equitably relative to one**
6 **another.**

7 The Settlement benefits will be allocated fairly amongst Hyundai-Kia Class
8 members to be “generally proportionate to the harm they suffered on account of
9 [the] alleged misconduct,” *Altamirano v. Shaw Industries, Inc.*, No. 13-CV-00939-
10 HSG, 2015 WL 4512372, at *8 (N.D. Cal. July 24, 2015), and to “roughly
11 correspond[s] to the strength of [class members’] claims.” *In re Volkswagen “Clean*
12 *Diesel” Mktg., Sales Practices, & Prods. Liab. Litig.*, No. 15-MD-02672-CRB,
13 2022 WL 17730381, at *8 (N.D. Cal. Nov. 9, 2022).¹² Consistent with this
14 authority, the Court previously found that the Settlement distributes relief among
15 Hyundai-Kia Class members in a “fair and reasonable” way. Prelim. Order at 21.
16 Indeed, “each Class member is subject to the same release and may submit a claim
17 for cash compensation through a simple, streamlined claim form.” *Id.* See also SA
18 §§ III.D; VII.

19 This means that Settlement Class members with Recalled Vehicles, who
20 spent or will spend time and money related to the Recalls, can submit claims to
21 reimburse their reasonable out-of-pocket costs incurred. Additional, relevant non-
22 monetary benefits for Recalled Vehicles will encourage recall participation (loaner
23 vehicles and outreach) and warrant the new parts installed pursuant to the Recall
24 repair (New Parts Warranty). Should Hyundai or Kia recall more vehicles due to

25 ¹² See also *In re Blue Cross Blue Shield Antitrust Litig. MDL 2406*, No. 22-10351,
26 2023 WL 7012247, at *9-10 (11th Cir. Oct. 25, 2023) (affirming approval of
27 allocation formula that considered the “comparative strengths of each class’s . . .
28 claims”); *Sullivan v. DB Invs., Inc.*, 667 F.3d 273, 328 (3d Cir. 2011) (holding that
“[c]ourts generally consider plans of allocation that reimburse class members based
on the type and extent of their injuries to be reasonable”); J.M McLaughlin,
McLaughlin on Class Actions § 6:23 (20th ed.) (same).

1 the ACU Defect in the future, the recall-related benefits will also extend to the
2 later-recalled vehicles. *See* SA § III.B(1) (reimbursements); § III.F.5 (New Parts
3 Warranty). Apart from the recall-related relief, *all* Settlement Class members may
4 claim a Residual payment—up to \$350 for Recalled Vehicles and \$150 for
5 Unrecalled Vehicles—and likewise stand to benefit from the Inspection Program to
6 investigate and document relevant field incidents. *See supra* § III.B. The proposed
7 Settlement Class Representatives can claim Settlement compensation like any other
8 Settlement Class member, and thus receive no preferential treatment. The proposed
9 \$2,500 service awards are a fair recognition of their efforts, and are well in line
10 with sums routinely approved in this district. *See supra* § IV.C.

11 In sum, the Settlement benefits are allocated equitably based on transparent
12 and objective criteria, such that administration is feasible, cost effective, and
13 streamlined for the Settlement Class. *See* Fed. R. Civ. P. 23(e)(2)(D); *see also In re*
14 *ZF-TRW ACUs Toyota Final App.*, 2023 WL 9227002 (approving similar allocation
15 structure in Toyota settlement).

16 **5. The Settlement satisfies the Ninth Circuit’s approval factors.**

17 The Ninth Circuit has identified several additional factors for evaluating class
18 action settlements. *See In re Bluetooth Headset Prods. Liab. Litig.*, 654 F.3d 935,
19 946 (9th Cir. 2011) ((1) the strength of the plaintiffs’ case; (2) the risk, expense,
20 complexity, and likely duration of further litigation; (3) the risk of maintaining class
21 action status throughout the trial; (4) the amount offered in settlement; (5) the
22 extent of discovery completed and the stage of the proceedings; (6) the experience
23 and views of counsel; (7) the presence of a governmental participant; and (8) the
24 reaction of the class members).

25 Most of these factors (1-5) overlap with those under Rule 23(e)(2)(C) and are
26 addressed above. The remaining relevant factors (6 and 8) weigh in favor of final
27 approval as well.

28

1 Program was designed to reach “virtually all” Settlement Class members.
2 Declaration of Jennifer Keough (“Keough Decl.”) ¶ 2. To date, JND has emailed
3 6,070,187 individual notices, with the direct notice mail campaign (to reach class
4 members for whom an Email Notice bounced back, or for those without a valid
5 email address) is due to commence tomorrow, July 16, 2025. *Id.* ¶¶ 10, 12. JND
6 also engaged in a comprehensive supplemental notice through a press release,
7 digital campaign, and internet search campaign, generating over 21 million
8 impressions. *Id.* ¶¶ 21, 23.

9 In response to this robust notice effort, with 18+ months remaining in the
10 claims program, the Settlement Class is already showing their support for the
11 Settlement. Settlement Class members are visiting the Settlement Website at an
12 impressive rate, with 62,720 unique visitors so far. *Id.* ¶ 31. As of July 14, 2025,
13 moreover, JND had received 13,728 Settlement Claims, the vast majority of which
14 were submitted through the streamlined submission portal available on the
15 Settlement Website. *Id.* ¶ 36. In contrast, JND has received a single request for
16 exclusion and no Settlement Class member has objected to the Settlement. *Id.* ¶ 39.

17 Together, these are encouraging signs of the Settlement Class’s engagement,
18 with the Notice Program ongoing and 18+ months remaining in the Claims Period.
19 This positive response from the Settlement Class supports final approval, and
20 Settlement Class Counsel have every reason to believe it will stay that way.¹³

21 * * *

22 _____
23 ¹³ Although the total cost of the notice and claims administration will ultimately
24 depend on the final tally of notices sent, questions received, and claims rate, among
25 other variables, JND projects costs to range from approximately \$5.3 million to
26 \$7.2 million based on typical settlement participation rates of 5%-10%. *Id.* ¶ 41.
27 These numbers have been revised from the figures at preliminary approval to reflect
28 the data since received on potential class members from the state DMVs, and the
resulting notices to be sent. Mr. Hron, for his part, has estimated the targeted work
in adjudicating the out-of-pocket claims program to will cost \$200,000 - \$400,000.
See ECF 1027-3 (Declaration of Patrick Hron) at ¶ 10.

1 The Settlement is fair, reasonable, and adequate, and warrants final approval.

2 **B. The Settlement Class satisfies the applicable Rule 23 requirements**
3 **and should be certified.**

4 The Court’s earlier findings that the Rule 23(a) and 23(b)(3) requirements
5 were satisfied, *see* Prelim. Order at 16, support final certification for settlement
6 purposes now.

7 **1. Rule 23(a)(1): The Class is sufficiently numerous.**

8 Rule 23(a)(1) is satisfied where, as here, “the class is so numerous that
9 joinder of all class members is impracticable.” Fed. R. Civ. P. 23(a)(1). The
10 Settlement Class includes current and former owners and lessees of at least 3.7
11 million Hyundai and Kia Subject Vehicles, which is “sufficient to satisfy the
12 numerosity requirement.” Prelim. Order at 12-13; *see also* 5 *Moore’s Federal*
13 *Practice—Civil* § 23.22 (2016) (A “class of 41 or more is usually sufficiently
14 numerous.”). Numerosity remains satisfied.

15 **2. Rule 23(a)(2): The Class Claims present common questions**
16 **of law and fact.**

17 Rule “23(a)(2) conditions class certification on demonstrating that members
18 of the proposed class share common ‘questions of law or fact.’” *Stockwell v. City &*
19 *County of San Francisco*, 749 F.3d 1107, 1111 (9th Cir. 2014). Commonality “does
20 not turn on the number of common questions, but on their relevance to the factual
21 and legal issues at the core of the purported class’ claims.” *Jimenez v. Allstate Ins.*
22 *Co.*, 765 F.3d 1161, 1165 (9th Cir. 2014). “Even a single question of law or fact
23 common to the members of the class will satisfy the commonality requirement.”
24 *Wal-Mart Stores, Inc. v. Dukes*, 564 U.S. 338, 369 (2011) (Ginsberg, J., concurring
25 in part and dissenting in part).

26 Courts routinely find commonality where, as here, the class claims arise from
27 an automaker’s alleged fraudulent conduct to uniformly misrepresent and conceal a
28 defect in its vehicles. That includes this Court’s holdings in this litigation. *See*

1 Prelim. Order at 13 (“Plaintiffs have identified at least one common question as to
2 whether [Defendants’] alleged omissions and uniform misrepresentations to Class
3 members were fraudulent.”); *In re ZF-TRW ACUs Mitsu. Prelim. App.*, ECF 983 at
4 11 (same for the Mitsubishi Settlement); *In re ZF-TRW ACUs Toyota Prelim. App.*,
5 2023 WL 6194109, at *11 (same for the Toyota Settlement); *see also, e.g.*,
6 *Volkswagen*, 2022 WL 17730381, at *3; *In re Chrysler-Dodge-Jeep Ecodiesel*
7 *Mktg., Sales Practices, & Prods. Liab. Litig.*, No. 17-MD-02777-EMC, 2019 WL
8 536661, at *6 (N.D. Cal. Feb. 11, 2019); *In re Takata Airbag Prods. Liab. Litig.*,
9 No. 14-24009-CV, 2017 WL 11680208, at *3 (S.D. Fla. Sept. 19, 2017); *Looper v.*
10 *FCA US LLC*, No. LACV 14-00700-VAP (DTBx), 2017 WL 11650429, at *4 (C.D.
11 Cal. Mar. 23, 2017) (similar common questions about defective steering linkages);
12 *Guido v. L’Oreal, USA, Inc.*, 284 F.R.D. 468, 478 (C.D. Cal. 2012) (whether
13 misrepresentations “are unlawful, deceptive, unfair, or misleading to reasonable
14 consumers are the type of questions tailored to be answered in ‘the capacity of a
15 classwide proceeding’”) (quoting *Dukes*, 564 U.S. at 350).

16 These common questions will, in turn, generate common answers “apt to
17 drive the resolution of the litigation” for the Settlement Class as a whole. *See*
18 *Dukes*, 564 U.S. at 350. Conversely, “[w]ithout class certification, individual Class
19 members would be forced to separately litigate the same issues of law and fact
20 which arise from” the Defendants’ fraud. *In re Volkswagen “Clean Diesel” Mktg.,*
21 *Sales Practices, & Prods. Liab. Litig.*, No. MDL 2672 CRB (JSC), 2016 WL
22 4010049, at *10 (N.D. Cal. July 29, 2016). Commonality remains satisfied. *See*
23 Prelim. Order at 13 (affirming commonality).

24 **3. Rule 23(a)(3): The Settlement Class Representatives’ claims**
25 **are typical of other Hyundai-Kia Class members’ claims.**

26 Rule 23(a)(3) requires that “the claims or defenses of the representative
27 parties [be] typical of the claims or defenses of the class.” *Parsons v. Ryan*, 754
28 F.3d 657, 685 (9th Cir. 2014) (quoting Fed. R. Civ. P. 23(a)(3)). Claims are

1 “typical” if they are “reasonably co-extensive with those of absent class members;
2 they need not be substantially identical. Hanlon, 150 F.3d at 1020. Here, the
3 Settlement Class Representatives, like all other Settlement Class members,
4 purchased or leased Hyundai and Kia Subject Vehicles equipped with a defective
5 DS84 ACU and allege they overpaid as a result. Typicality is therefore satisfied. *See*
6 Prelim. Order at 13-14 (finding typicality).

7 **4. Rule 23(a)(4): The Settlement Class Representatives and**
8 **Settlement Class Counsel have and will continue to**
9 **adequately protect the interests of the Class.**

10 Rule 23(a)(4)’s adequacy requirement is met where “(1) . . . the named
11 plaintiffs and their counsel have [no] conflicts of interest with other class members
12 and (2) . . . the named plaintiffs and their counsel [have] prosecute[d] the action
13 vigorously on behalf of the class.” *Evon v. Law Offices of Sidney Mickell*, 688 F.3d
14 1015, 1031 (9th Cir. 2012) (quoting *Hanlon*, 150 F.3d at 1020). Both are true here.
15 *See* Prelim. Order at 14-15 (finding adequacy satisfied for both the Hyundai-Kia
16 Plaintiffs and Settlement Class Counsel at preliminary approval).

17 As the Court correctly found “[t]here is no evidence that the Class
18 Representatives have interests that are antagonistic to those of other Class
19 members.” Prelim. Order at 14. The same was true in the Mitsubishi and Toyota
20 Settlements. *See In re ZF-TRW ACUs Mitsu. Prelim. App.*, ECF 983 at 12; *In re ZF-*
21 *TRW ACUs Toyota Prelim. App.*, 2023 WL 6194109, at *11. The Settlement Class
22 Representatives are “entirely aligned [with the Settlement Class] in their interest in
23 proving that [Defendants] misled them” and in their “common goal of obtaining
24 redress.” *Volkswagen*, 2016 WL 4010049, at *11. They understand their duties,
25 have agreed to consider the interests of absent Settlement Class members, and have
26 reviewed and uniformly endorsed the Settlement terms. *See* Co-Lead Decl. ¶ 8. The
27 Settlement Class Representatives are more than adequate.

28 Furthermore, as discussed in § IV below, Settlement Class Counsel have
undertaken extensive amounts of work, effort, and expense in this MDL and

1 specifically in litigating the Hyundai-Kia Plaintiffs’ Claims. They have
2 demonstrated their willingness to devote whatever resources were necessary to
3 reach a successful outcome, and are likewise adequate. Settlement Class Counsel
4 are likewise adequate. *See In re ZF-TRW ACUs Mitsu. Prelim. App.*, ECF 983 at 12
5 (finding adequacy satisfied); *In re ZF-TRW ACUs Toyota Prelim. App.*, 2023 WL
6 6194109, at *12 (same).

7 **5. Rule 23(b)(3)—Predominance: Common issues of law and**
8 **fact predominate.**

9 “The Rule 23(b)(3) predominance inquiry tests whether proposed classes are
10 sufficiently cohesive to warrant adjudication by representation.” *In re ZF-TRW*
11 *ACUs Toyota Prelim. App.*, 2023 WL 6194109, at *12 (quoting *Amchem Prods.*
12 *Inc. v. Windsor*, 521 U.S. 591, 623 (1997)). This inquiry “focuses on whether the
13 ‘common questions present a significant aspect of the case and they can be resolved
14 for all members of the class in a single adjudication.’” *In re Hyundai & Kia Fuel*
15 *Econ. Litig.*, 926 F.3d 539, 557 (9th Cir. 2019) (quoting *Hanlon*, 150 F.3d at 1022).
16 “When ‘one or more of the central issues in the action are common to the class and
17 can be said to predominate, the action may be considered proper under Rule
18 23(b)(3) even though other important matters will have to be tried separately, such
19 as damages or some affirmative defenses peculiar to some individual class
20 members.’” *Tyson Foods, Inc. v. Bouaphakeo*, 577 U.S. 442, 453 (2016).

21 The Ninth Circuit favors class treatment of fraud claims stemming from a
22 “common course of conduct.” *See In re First Alliance Mortg. Co.*, 471 F.3d 977,
23 990 (9th Cir. 2006); *Hanlon*, 150 F.3d at 1022-23. Predominance is routinely found
24 when consumer claims stem from the defendants’ common course of conduct. *See*
25 *Amchem*, 521 U.S. at 625; *Wolin v. Jaguar Land Rover N. Am., LLC*, 617 F.3d 1168,
26 1173, 1175 (9th Cir. 2010) (consumer claims based on uniform omissions
27 certifiable where “susceptible to proof by generalized evidence,” even if
28 individualized issues remain); *Friedman v. 24 Hour Fitness USA, Inc.*, No. CV 06-

1 6282 AHM (CTx), 2009 WL 2711956, at *8 (C.D. Cal. Aug. 25, 2009) (“Common
2 issues frequently predominate” in actions alleging “injury as a result of a single
3 fraudulent scheme.”).

4 That is the case here. Plaintiffs allege a uniform course of conduct in which
5 the Settling Defendants manufactured and sold Subject Vehicles containing
6 defective DS84 ACUs without disclosing that defect to consumers. This conduct
7 forms the basis of all Settlement Class members’ claims and is susceptible to
8 common proof. *See Hyundai*, 926 F.3d at 559 (“In many consumer fraud cases, the
9 crux of each consumer’s claim is that a company’s mass marketing efforts, common
10 to all consumers, misrepresented the company’s product”); *see also*
11 *Volkswagen*, 2016 WL 4010049, at *12 (predominance where defendants
12 “perpetrated the same fraud in the same manner against all Class members”) The
13 same conclusion was reached in the related Mitsubishi and Toyota settlements. *See*
14 *In re ZF-TRW ACUs Mitsu. Prelim. App.*, ECF 983 at 13 (common questions
15 predominated as to “[Defendants’] alleged course of conduct of manufacturing and
16 selling vehicles containing defective ACUs without disclosing the alleged defect to
17 Class members”); *In re ZF-TRW ACUs Toyota Prelim. App.*, 2023 WL 6194109, at
18 *12 (same). This Court likewise found that, “[w]hether Hyundai-Kia’s actions were
19 fraudulent is a question that is central to Plaintiffs’ claims, and which is suitable for
20 resolution on a classwide basis.” Prelim. Order at 13.

21 Common questions include: (1) when the Settling Defendants first learned of
22 the ACU Defect; (2) whether representations about the Hyundai and Kia Subject
23 Vehicle’s airbags and safety systems were misleading to reasonable consumers; and
24 (3) whether the Settling Defendants’ actions was fraudulent. Predominance remains
25 satisfied. *See* Prelim. Order at 15-16 (finding predominance satisfied based on these
26 questions).

1 6. **Rule 23(b)(3)—Superiority: Class treatment is superior to**
2 **other available methods for the resolution of this case.**

3 The superiority inquiry asks, “whether the objectives of the particular class
4 action procedure will be achieved in the particular case.” *Hanlon*, 150 F.3d at 1023.
5 In other words, it “requires the court to determine whether maintenance of this
6 litigation as a class action is efficient and whether it is fair.” *Wolin*, 617 F.3d at
7 1175-76. Under Rule 23(b)(3),

8 the Court evaluates whether a class action is a superior
9 method of adjudicating plaintiff’s claims by evaluating
10 four factors: “(1) the interest of each class member in
11 individually controlling the prosecution or defense of
12 separate actions; (2) the extent and nature of any litigation
13 concerning the controversy already commenced by or
14 against the class; (3) the desirability of concentrating the
15 litigation of the claims in the particular forum; and (4) the
16 difficulties likely to be encountered in the management of
17 a class action.”

18 *Trosper v. Styker Corp.*, No. 13-CV-0607-LHK, 2014 WL 4145448, at *17 (N.D.
19 Cal. Aug. 21, 2014).

20 All factors support class treatment here. Litigating potentially millions of
21 individual consumer actions would be inefficient, duplicative, and cost-prohibitive,
22 and thus an all-around “inferior method of adjudication.” *Wolin*, 617 F.3d at 1176.
23 “From either a judicial or litigant viewpoint, there is no advantage in individual
24 members controlling the prosecution of separate actions. There would be less
25 litigation or settlement leverage, significantly reduced resources and no greater
26 prospect for recovery.” *Hanlon*, 150 F.3d at 1023.

27 Although the damages at issue are meaningful for individual Settlement
28 Class members, they pale in comparison to the cost and complexity of pursuing
29 these claims alone. *See Smith v. Cardinal Logistics Mgmt. Corp.*, No. 07-2104 SC,
30 2008 WL 4156364, at *11 (N.D. Cal. Sept. 5, 2008) (small interest in individual
31 litigation where damages averaged \$25,000-\$30,000 per year of work); Prelim.

1 Order at 16 (“Class members may not have a strong incentive to pursue to pursue
2 their claims individually given their small, potential recoveries.”).

3 Class resolution is also superior from an efficiency and resource perspective.
4 Indeed, “[i]f Class members were to bring individual lawsuits against [Defendants],
5 each Member would be required to prove the same wrongful conduct to establish
6 liability and thus would offer the same evidence.” *Volkswagen*, 2016 WL 4010049,
7 at *12. Plaintiffs’ claims involved approximately 3.7 million Subject Vehicles, and
8 “there is the potential for just as many lawsuits with the possibility of inconsistent
9 rulings and results.” *Id.* “Thus, classwide resolution of their claims is clearly
10 favored over other means of adjudication, and the proposed Settlement resolves
11 Class members’ claims at once.” *Id.* Superiority is met here, and Rule
12 23(e)(1)(B)(ii) is satisfied. *See* Prelim. Order at 16.

13 * * *

14 The Settlement Class meets all relevant requirements of Rule 23(a) and (b).
15 Plaintiffs thus request that the Court confirm the certification of the Settlement
16 Class and the appointment of the Settlement Class Representatives.

17 **C. The Court should confirm Plaintiffs’ Counsel as Settlement Class**
18 **Counsel under Rule 23(g)(1).**

19 Settlement Class Counsel have devoted significant time, effort, and resources
20 to litigating the Hyundai-Kia Plaintiffs’ claims. In recognition of those efforts, the
21 Court appointed Co-Lead Counsel and the PSC as Settlement Class Counsel at the
22 preliminary approval stage. *See* Prelim. Order at 26-27.

23 Since then, Settlement Class Counsel have continued to demonstrate the skill
24 and experience necessary to oversee and effectuate this Settlement through their
25 efforts in the approval process and in overseeing the Notice Program roll out. The
26 Hyundai-Kia Plaintiffs thus request that the Court confirm Settlement Class
27 Counsel under Rule 23(g)(1) in connection with Final Approval of the Settlement.
28

1 **IV. SETTLEMENT CLASS COUNSEL’S REQUESTED FEE IS FAIR,**
2 **REASONABLE, AND APPROPRIATE.**

3 For more than six years, Settlement Class Counsel have pursued claims
4 against the Settling Defendants for allegedly misleading millions of consumers
5 about the dangerous safety defect in the Subject Vehicles. The litigation, which
6 focuses on a technical defect and complex engineering concepts, has been both hard
7 fought and protracted. As the Court is aware, the parties strongly contest key issues
8 in the case and Defendants have raised comprehensive (and pending) pleading
9 challenges. Following a substantial allocation of resources—undertaken without
10 any guarantee of recovery or reimbursement—Settlement Class Counsel achieved a
11 remarkable result for the Settlement Class. They now seek fair and reasonable
12 compensation for the time and effort it took to secure this strong result for the
13 Settlement Class.

14 “[L]awyer[s] who recover[] a common fund . . . [are] entitled to a reasonable
15 attorney’s fee from the fund as a whole.” *Boeing Co. v. Van Gemert*, 444 U.S. 472,
16 478 (1980). This “common-fund doctrine” allows a court to “assess[] attorney’s
17 fees against the entire fund, thus spreading fees proportionately among those
18 benefited by the suit.” *Id.* Here, Settlement Class Counsel request attorneys’ fees of
19 \$20.5 million,¹⁴ which reflects 26.5% of the Settlement value obtained for
20 Settlement Class members (i.e., \$75.7 million, including the New Parts Warranty
21 for Recalled Vehicles, and not accounting, conservatively, for the \$50.5 million
22 value of the New Parts Warranty in the event of a future recall).¹⁵

23 ¹⁴ Settlement Class Counsel requests reimbursement of reasonable out-of-pocket
24 expenses of \$400,000, detailed further in § IV.B below.

25 ¹⁵ As the Court noted in its Preliminary Approval Order, Settlement Class Counsel
26 anticipated a request for fees and costs of “up to 33%” of the \$62.1 million
27 Settlement Amount, with the actual percentage much lower (Prelim. Order at 24),
28 as it is now at 26.5% after taking into account both the monetary and non-monetary
benefits to the Class (but still not including the prospective \$50.5M value of the
New Parts Warranty for Unrecalled Vehicles). In any event, the Court noted that an

Footnote continued on next page

1 Courts in this Circuit use several factors to assess the reasonableness of a
2 requested attorneys' fee: (1) the results achieved; (2) the complexity of the case and
3 skill required; (3) the risks of litigation; (4) the benefits to the class beyond the
4 immediate generation of a cash fund; (5) the market rate of customary fees for
5 similar cases; (6) the contingent nature of the representation and financial burden
6 carried by counsel; and (7) a lodestar cross-check. *See, e.g., In re*
7 *Volkswagen "Clean Diesel" Mktg., Sales Practices, & Prods. Liab. Litig.*, No. MDL
8 2672 CRB (JSC), 2017 WL 1047834, at *1 (N.D. Cal. Mar. 17, 2017) ("*VW 2L Fee*
9 *Order*") (citing *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043, 1048-52 (9th Cir.
10 2002)); *see also Six (6) Mexican Workers v. Ariz. Citrus Growers*, 904 F.2d 1301,
11 1311 (9th Cir. 1990). Each factor strongly supports Settlement Class Counsel's
12 request in this case.

13 The Court should affirm its finding for purposes of preliminary approval that
14 Plaintiffs' requested fee was "within the range of what is reasonable under the
15 circumstances." Prelim. Order at 24. Then as now, the request is "fundamentally
16 fair, adequate, and reasonable" considering the facts and circumstances of this
17 litigation. *Staton*, 327 F.3d at 963 (quoting Fed. R. Civ. P. 23(e)).

18 **A. Settlement Class Counsel obtained substantial benefits for the**
19 **Hyundai-Kia Class.**

20 The result achieved is the central factor to assess the reasonableness of the
21 requested fee. *In re Bluetooth*, 654 F.3d at 942; *In re Omnivision Techs., Inc.*, 559 F.
22 Supp. 2d 1036, 1046 (N.D. Cal. 2008); *see also In re Nexus 6P Prods. Liab. Litig.*,
23 No. 17-CV-02185-BLF, 2019 WL 6622842, at *12 (N.D. Cal. Nov. 12, 2019) ("The
24 most critical factor is the results achieved for the class."); *Hensley v. Eckerhart*, 461
25 U.S. 424, 436 (1983) (same); *Manual for Complex Litigation* § 21.71 (4th ed.)

26 _____
27 upward adjustment from the 25% benchmark "may be warranted here, where
28 substantial payments and meaningful non-monetary benefits have been obtained for
Class members, the case has proceeded for six years and Counsel took the case on
contingency." *Id.*

1 (“The ‘fundamental focus is the result actually achieved for class members.’”)
2 (quoting Fed. R. Civ. P. 23(h) committee note).

3 The excellent results provide strong support for the fees requested here. As
4 detailed above, the Settlement provides sizeable cash benefits that fairly reflect the
5 harm that each Settlement Class member suffered from the ACU Defect at the
6 hands of the Settling Defendants. This cash relief strongly supports the fee request.
7 *See In re Nexus 6P*, 2019 WL 6622842, at *12 (upward adjustment from the 25%
8 benchmark where settlement “allow[ed] all class members to receive a monetary
9 benefit”).

10 Further, the Settlement’s non-monetary elements provide additional value to
11 the Settlement Class and support for the request. As Mr. Kleckner opines, the New
12 Parts Warranty provides at least \$13.6M in additional value for Settlement Class
13 members with currently Recalled Vehicles, and additional prospective value of
14 \$50.3M should a recall be required in the future for additional vehicles. Kleckner
15 Decl. ¶¶ 6(f), 8(f). The innovative ten-year Inspection Protocol, which mandates
16 procedures for the active investigation and documentation of airbag non-
17 deployments, likewise provides valuable (although not calculable) benefits to the
18 Settlement Class.

19 Both the warranty and the Inspection Protocol are appropriately factored in to
20 assess the Settlement’s total value to the Settlement Class, and the size of a
21 reasonable attorney fee for having secured it. *See In re Zoom Video Commc'ns, Inc.*
22 *Priv. Litig.*, No. 20-CV-02155-LB, 2022 WL 1593389, at *10 (N.D. Cal. Apr. 21,
23 2022) (both “monetary and non-monetary benefits” contribute to settlement value);
24 *Pan v. Qualcomm Inc.*, No. 16-CV-01885-JLS-DHB, 2017 WL 3252212, at *12
25 (S.D. Cal. July 31, 2017) (concluding that “substantial” non-monetary relief that
26 could not be accurately valued supported fee award of nearly 30%).

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1. **The Settlement resulted from Settlement Class Counsel’s zealous representation in complex and risky litigation.**

This case involves a long-standing and complex alleged fraudulent scheme about a technical engineering defect among twenty-nine Defendants, comprised of six vehicle manufacturer groups and three component supplier groups. Many of these Defendants, including Hyundai Korea, Kia Korea, and Hyundai Mobis, are based outside the U.S. and fought the Court’s personal jurisdiction.

Plaintiffs’ investigation of the ACU Defect and related evidence, including the numerous crashes and EOS related failures over more than a decade, was technically challenging. This was further complicated by the breadth of the millions of vehicles at issue, which date as far back as 2010. Evidence of the ACU Defect can be traced back to the ZF and STMicro Defendants’ early design and testing of the DS84 ACU in 2008. Plaintiffs allege that Hyundai, Kia and the other Vehicle Manufacturers Defendants knew about the ACU Defect, at minimum, shortly after the DS84 ACUs were installed in the Subject Vehicles and coordinated with each other to share information and conceal the ACU Defect.

Prosecuting allegations of an extensive scheme that began over 15 years ago required comprehensive analysis of contemporaneous documentation and complex testing and engineering documents. This demanded time, effort, and expertise. To do so, Settlement Class Counsel retained and worked closely with technical experts to understand the complex minutiae of electrical engineering principles and microchip circuitry. It has been a risky case, too, for several reasons. As detailed above, the majority of Plaintiffs’ dozens of state law claims against the Hyundai and Kia Defendants have not yet survived the pleading stage, and foreign Defendants Hyundai Mobis and Kia Corp. were dismissed on jurisdictional grounds. And, while the Court upheld RICO claims against the domestic Hyundai and Kia Defendants, it has not sustained RICO claims against their foreign parents. See § II.B.

1 That Settlement Class Counsel achieved such substantial relief at this stage
2 speaks to their skill, effort, and persistent dedication to the Class. It also strongly
3 supports their fee request. *See, e.g., Hanlon*, 150 F.3d at 1029 (“complexity and
4 novelty of the issues” can justify upward departure from benchmark); *In re Oracle*
5 *Sec. Litig.*, 852 F. Supp. 1437, 1450–51 (N.D. Cal. 1994) (same).

6 **2. Precedent strongly supports the request for 26.5% of the**
7 **fund in attorneys’ fees here.**

8 When a settlement establishes a common fund, it is appropriate to award
9 attorneys’ fees based on a percentage of the monetary benefit obtained. *See*
10 *Vizcaino*, 290 F.3d at 1047. The fund includes *all* benefits obtained for the
11 Settlement Class with a calculable economic value. *See In re Zoom Video*, 2022
12 WL 1593389, at *10 (subsequent history omitted) (“[C]ourts consider the monetary
13 and non-monetary benefits that the settlement confers” to determine value.); *Banh*,
14 2021 WL 3468113, at *7 (“[I]t is the complete package taken as a whole . . . that
15 must be examined for overall fairness.”).

16 Settlement Class Counsel request \$20,093,033 in fees. This represents 26.5%
17 of the total calculable Settlement value, conservatively excluding the prospective
18 \$50.3 million value of the New Parts Warranty for Unrecalled Vehicles, and sits
19 comfortably near the “benchmark” award of 25%, as well as higher percentages
20 routinely approved in class action settlements in this Circuit. *See, e.g., Hernandez*,
21 2021 WL 5053476, at *6 (collecting cases and finding that attorneys’ fees awards
22 that are one-third of the total settlement fund “are routinely upheld by the Ninth
23 Circuit”); *In re Telescopes Antitrust Litig.*, No. 5:20-CV-03639-EJD, 2025 WL
24 1093248, at *10 (N.D. Cal. Apr. 11, 2025) (awarding 33.33% of settlement value
25 and find it was “consistent with Ninth Circuit precedent”); *In re ZF-TRW ACUs*
26 *Mitsu. Final App.*, ECF 1039 (approving 30% fee request where Plaintiffs’ Counsel
27 has achieved a valuable outcome for the Class and has undertaken significant work
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1 on behalf of the Class over the last six years.”¹⁶

2 Consistent with this authority, in granting preliminary approval, the Court
3 observed that “a 33% recovery award is within the range of what is reasonable
4 under the circumstances.” Prelim. Order at 24. Settlement Class Counsel
5 respectfully submit their 26.5% fee request remains just as reasonable and
6 appropriate now.¹⁷

7 **3. Settlement Class Counsel carried considerable financial**
8 **burden and risk in prosecuting this complex litigation.**

9 It is well-established that attorneys who take on representation on a
10 contingent basis are appropriately rewarded when successful to account for the
11 significant risk of receiving no compensation. *See In re Wash. Pub. Power Supply*

12 _____
13 ¹⁶ In this Circuit, fee awards “exceed[] the [25%] benchmark” in “most common
14 fund cases.” *In re NCAA Athletic Grant-in-Aid Cap Antitrust Litig.*, No. 4:14-MD-
15 2541-CW, 2017 WL 6040065, at *2 (N.D. Cal. Dec. 6, 2017) *aff’d*, 768 F. App’x
16 651 (9th Cir. 2019) (emphasis added); *see also Fernandez v. Victoria Secret Stores,*
17 *LLC*, No. CV 06–04149 MMM SHX, 2008 WL 8150856, at *16 (C.D. Cal. July 21,
18 2008) (awarding 34% of the \$8,500,000 common fund); *In re TFT–LCD (Flat*
19 *Panel) Antitrust Litig.*, No. MDL 3:07–md–1827 SI, 2011 WL 7575003, at *1 (N.D.
20 Cal. Dec. 27, 2011) (awarding attorneys’ of 30% of \$405 million settlement fund);
21 *In re CRT Antitrust Litig.*, MDL No. 1917, 2016 WL 4126533, at *5 (N.D. Cal.
22 Aug. 3, 2016) (awarding 30% of \$576,750,000 fund); *In re Mego*, 213 F.3d at 463
23 (upholding district court’s award of 33 1/3 percent of the settlement fund); *Vizcaino*,
24 290 F.3d at 1046 (affirming fee award of 28% of \$96,885,000 settlement fund under
the percentage method); *Boyd v. Bank of Am. Corp.*, No. SACV 13–0561–DOC
(JPRx), 2014 WL 6473804, at *8 (C.D. Cal. Nov. 18, 2014) (awarding 33% of
\$5,800,000 settlement); *Stuart v. RadioShack Corp.*, No. C-07-4499 EMC, 2010
WL 3155645, at *6 (N.D. Cal. Aug. 9, 2010) (awarding 33% of common fund);
Barbosa v. Cargill Meat Sols. Corp., 297 F.R.D. 431, 450 (E.D. Cal. 2013)
(awarding 33% of common fund).

25 ¹⁷ Indeed, even if measured against only the \$62.1 million Settlement Amount
26 (which does not reflect the full value of the relief obtained for the Settlement
27 Class), the reasonable fee request (32.4%) continues to find strong support from
28 this Court’s preliminary findings and other relevant authority. *Supra* n. 16.

1 *Sys. Sec. Litig.*, 19 F.3d 1291, 1299-1300 (9th Cir. 1994). Such a practice
2 encourages the legal profession to assume this risk and promotes competent
3 representation for plaintiffs who might otherwise be unable to afford an attorney.
4 *Id.*; see also *Vizcaino*, 290 F.3d at 1051.

5 Settlement Class Counsel have devoted more than 123,000 hours to this
6 consolidated litigation effort and advanced all necessary expenses to see this case
7 through to a successful outcome, all with the risk of losing their entire huge
8 investment. Co-Lead Decl. ¶ 24, Exhibit A. In so doing, Settlement Class Counsel
9 “turn[ed] down opportunities to work on other cases to devote the appropriate
10 amount of time, resources, and energy necessary to handle this complex case.” *VW*
11 *2L Fee Order*, 2017 WL 1047834, at *3. This factor further supports Settlement
12 Class Counsel’s request.

13 4. **A lodestar cross-check confirms the requested fees are**
14 **reasonable.**

15 “Because the benefit to the class is easily quantified in common-fund
16 settlements,” the Ninth Circuit permits district courts “to award attorneys a
17 percentage of the common fund in lieu of the often more time-consuming task of
18 calculating the lodestar.” *In re Bluetooth*, 654 F.3d at 942; *Gutierrez v. Amplify*
19 *Energy Corp.*, No. 8:21-CV-01628 DOC JDE(x), 2023 WL 6370233, at *6 (C.D.
20 Cal. Sept. 14, 2023) (in common fund cases in the Ninth Circuit, “the primary basis
21 of the fee award remains the percentage method”) (quoting *Vizcaino*, 290 F.3d at
22 1050). Nevertheless, courts employ a streamlined lodestar “cross-check” on the
23 reasonableness of a requested award. See, e.g., *Vizcaino*, 290 F.3d at 1050. In so
24 doing, the Court need not “closely scrutinize each claimed attorney-hour” but rather
25 “focus on the general question of whether the fee award appropriately reflects the
26 degree of time and effort expended.” *Spann v. J.C. Penney Corp.*, 211 F. Supp. 3d
27 1244, 1265 (C.D. Cal. 2016).

28 As explained below and in the accompanying Co-Lead Counsel Declaration,

1 Settlement Class Counsel worked a reasonable number of hours billed at reasonable
2 rates under the circumstances of this complex, multi-district litigation.

3 a. **Class Counsel spent a reasonable number of hours**
4 **advancing this complex litigation.**

5 This is a technical case that has required (so far) six years of thorough
6 investigation, analysis, and legal strategy. *See, e.g.*, § II, *supra*. Settlement Class
7 Counsel spent some 123,000 hours to advance this litigation through March 31,
8 2025.¹⁸ This yields an “adjusted lodestar” of \$51,800,863.91 using the CBO capped
9 rates, and \$63,847,711.22 using the timekeepers’ market rates, in that period.¹⁹ *Id.*
10 ¶ 18, Exhibits A, B.

11 In their professional judgment and based on their familiarity with the work
12 performed at their direction, Co-Lead Counsel estimate the work reasonably
13 attributed to efforts that benefited the proposed Settlement Class and the
14 prosecution of their claims as follows: from the total adjusted lodestar, 65% to the
15 Vehicle Manufacturer Defendants, and the remaining 35% to the two main supplier
16 Defendants (ZF and ST Micro).²⁰ This reflects that much of the work for the

17 ¹⁸ Counsel submit lodestar data through March 31, 2025 in support of this motion.
18 Substantial work on the Hyundai-Kia litigation and settlement were incurred up to
19 that date, with additional time thereafter included in Counsel’s reasonable
20 projections of future work to be incurred.

21 ¹⁹ This “adjusted” lodestar subtracts out from the total lodestar figure the amounts
22 that were previously allocated to the Toyota Settlement (\$11,520,547.22 with
23 capped rates, and \$12,800,004.84 with market rates) and the Mitsubishi Settlement
24 (\$1,418,050.37 with capped rates, and \$1,618,188.94 with market rates) that were
25 previously approved by the Court. For that reason, the total lodestar reflected in the
26 Exhibits is higher than the applicable “adjusted” lodestar figure for this Settlement,
27 because the lodestar data in the Exhibits is comprehensive and includes all data.

28 ²⁰ As was true for the earlier Toyota and Mitsubishi settlements, because much of
the work performed benefits the entire MDL collectively, not just the specific case
or claim against any one Defendant, it is not practicable to disaggregate the
common benefit work among the various individual defendants. As such, Co-Lead
Counsel have apportioned a percentage of the total lodestar attributable to the

Footnote continued on next page

1 suppliers also advances the claims against the Vehicle Manufacturers, and that
2 settlements with three of the Vehicle Manufacturer groups to date means that the
3 relative time for the Suppliers has and will increase over time.²¹

4 Within the 65% allotted to the Vehicle Manufacturers, Co-Lead Counsel
5 estimate approximately 30% of that work is fairly attributable to the Settling
6 Defendants. This apportionment is supported by (a) the size of the Class, which
7 cover approximately 3.7 million of the 15 million vehicles at issue in this MDL; (b)
8 efforts in responding to all three of the Settling Defendant groups' pleading
9 challenges, and all Defendants' joint pleading challenges; (c) the discovery,
10 investigative and expert work that developed and advanced the Hyundai-Kia
11 Plaintiffs' claims to this favorable resolution; and (d) the focused time and efforts to
12 negotiate the proposed Settlement terms with the Settling Defendants over the
13 course of more than two and a half years.

14 Based on the above, the estimated lodestar for purposes of the attorneys' fee
15 request, using the applicable rate caps, is approximately \$10,101,168.46. Including
16 the anticipated future work to implement and protect the Settlement through the
17 Claims Period, Settlement Class Counsel expects the lodestar attributable to the
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24 Settling Defendants. Co-Lead Decl. ¶¶ 19-20. This Court accepted the same
25 methodology in the two earlier settlements in this litigation. *See In re ZF-TRW*
26 *ACUs Toyota Prelim. App.*, 2023 WL 6194109, at *22; *In re ZF-TRW ACUs Mitsu.*
27 *Prelim App.*, ECF 941 at 21; *see also* Prelim. Order at 25 (describing this approach
for Hyundai-Kia settlement).

28 ²¹ In the earlier Toyota and Mitsubishi Settlements, Co-Lead Counsel allotted 70%
to the Vehicle Manufacturers and 30% to the Suppliers.

1 Settling Defendants to be \$10,476,168.48.²² Co-Lead Decl. ¶¶ 21-23.²³

2 That time was (and will continue to be) spent effectively. With those hours,
3 Settlement Class Counsel reviewed and analyzed nearly 250,000 pages of
4 documents obtained through discovery from the Settling Defendants. They also
5 reviewed millions of additional pages of relevant documents in the MDL.
6 Analyzing, coding, and synthesizing this discovery was a very significant
7 undertaking that was critical to the litigation and resolution of this case. *Id.* This
8 extensive review informed their efforts to prosecute the Hyundai-Kia Class' claims.
9 *Id.* ¶¶ 4-5.

10 Settlement Class Counsel also engaged in thorough legal research and
11 briefing efforts on issues for the Settling Defendants' pleading challenges, as well
12 as the Joint Motion brought by all Defendants. *Id.* ¶ 26. Hyundai-Kia's pleading
13 challenges met with success, and many of the Hyundai-Kia Plaintiffs' claims did
14 not survive the motions to dismiss. ECF 396; supra § II.B. The Hyundai-Kia
15 Plaintiffs pressed on thereafter, researching and developing a 1,300+ page factually
16 detailed operative Complaint that they believe adequately states claims against
17 Hyundai-Kia and each of the remaining Defendants.

18 The settlement process itself took significant time, and involved dozens of
19 meetings, calls, information and data exchanges and much more over the course of
20 two and a half years. *Id.* ¶ 6. Underpinning all of this was Settlement Class
21 Counsel's work to fully understand the complex electrical engineering principles

22 ²² Based on their experience in other automotive class settlements, Settlement Class
23 Counsel estimate that approximately \$375,000 in lodestar (approximately 575 more
24 hours) will be necessary for the on-the-ground efforts to finalize, implement, and
25 protect the Settlement. This will include, for example, work required to: (1) defend
26 the Settlement against objections, if any; (2) protect the Settlement on appeal (if
27 any appeals are lodged); and (3) oversee and help implement the Settlement, which
28 will include, among other things, responding to questions and outreach from more
than 3.7 million Class members. Co-Lead Decl. ¶ 20.

²³ Counsel used an estimated blended average rate of \$650 for this calculation,
assuming a distribution of partner and associate work on the kinds of tasks to come.

1 and related issues involved in the ACU Defect, which provided the framework for
2 understanding the allegations and alleged damages in this case.

3 As this (partial) list demonstrates, this litigation has required a sustained,
4 multi-pronged effort and a significant dedication of time and resources. The
5 Hyundai-Kia Plaintiffs and Settlement Class Counsel fought hard to reach this
6 stage. The results won, after the hurdles faced, strongly support the fee award
7 requested here. As the Court found at preliminary approval, “[t]he hours charged
8 are generally reasonable.” Prelim. Order at 26.

9 **b. Settlement Class Counsel billed reasonable rates for**
10 **those hours.**

11 Settlement Class Counsel’s rates are capped by the Court-entered common
12 benefit order (“CBO”) (ECF 111), which “provides support for the reasonableness
13 of the rates claimed.” Prelim. Order at 26. The CBO limits the hourly rates for all
14 participating Plaintiffs’ Counsel at \$895/hour for partners; \$350-\$600/hour for
15 associates; \$415/hour for document review attorneys; and \$175-\$275/hour for
16 paralegals and assistants. These hourly rates were set in 2020 and have not since
17 been adjusted to account for five years of inflation or the changes in prevailing
18 market rates. For many timekeepers, these Court-capped hourly rates fall materially
19 below their standard and customary rates. *See* Co-Lead Decl. ¶ 12. Indeed, the total
20 adjusted lodestar applying each timekeeper’s standard hourly rates is
21 \$63,847,711.22, for a reduction of approximately 18.9% (\$12 million) from the
22 Court-approved, market-rate fees of participating counsel. Settlement Class
23 Counsel respectfully submit that compliance with the CBO provides strong support
24 for the reasonableness of the conservative rates used.

25 A comparison to the hourly rates commonly approved in this Circuit provides
26 even further support. “Affidavits of the plaintiffs’ attorney and other attorneys
27 regarding prevailing fees in the community, and rate determinations in other cases,
28 particularly those setting a rate for the plaintiffs’ attorney, are satisfactory evidence

1 of the prevailing market rate.” *United Steelworkers of Am. v. Phelps Dodge Corp.*,
2 896 F.2d 403, 407 (9th Cir. 1990). Courts in complex class action cases in this
3 Circuit routinely approve similar or higher hourly rates to those here—this Court,
4 for example, has already twice considered and approved the rates at issue. See *In re*
5 *ZF-TRW Toyota Final. App.*, 2023 WL 9227002, at *16; *In re ZF-TRW Mitsu Final.*
6 *App.*, ECF 1039 at 16-17. Then as now, that decision found broad support from
7 recent in-Circuit decisions. See, e.g., *Grey Fox, LLC v. Plains All-Am. Pipeline,*
8 *L.P.*, No. CV 16-03157 PSG (JEMX), 2024 WL 4267431, at *5-6 (C.D. Cal. Sept.
9 17, 2024) (approving fees with lodestar crosscheck using Lieff Cabraser’s 2024
10 hourly rates of up to \$1,380 for partners, \$345 to \$720 for associates, and \$345 to
11 \$535 for paralegals/research staff); *Katz-Lacabe v. Oracle Am., Inc.*, No. 3:22-CV-
12 04792-RS, 2024 WL 4804974, at *5 (N.D. Cal. Nov. 15, 2024), appeal dismissed,
13 No. 24-7650, 2025 WL 1703624 (9th Cir. Apr. 3, 2025) (same); *Waldrup v.*
14 *Countrywide Fin. Corp.*, No. 2:13-CV-08833-CAS-AGR_x, 2020 WL 13356468, at
15 *2 (C.D. Cal. July 16, 2020) (approving Baron & Budd’s hourly rates of \$825 to
16 \$975 for partners, and \$495 to \$625 for associates, requested at ECF 479-1 at 16).²⁴

17 Overall, the blended average billing rate for the work described above is
18 approximately \$602 per hour. Co-Lead Decl. ¶ 21. This is in line with average rates

19 ²⁴ See also *In re Google Location Hist. Litig.*, No. 18-cv-05062-EJD, 2024 WL
20 1975462, at *15 (N.D. Cal. May 3, 2024) (finding rates ranging from \$550–\$1,300
21 for partners, \$420–\$720 for associates, and \$535 for paralegals and other support
22 staff “fall within the range of those approved”); *Ramirez v. Trans Union, LLC*, No.
23 12-CV-00632-JSC, 2022 WL 17722395, at *9 (N.D. Cal. Dec. 15, 2022) (approving
24 hourly rates ranging “from \$1,325 to \$560 for partners and associates, and \$485-
25 \$455 for ‘litigation support’ and paralegals”); *In re Wells Fargo & Co. S’holder*
26 *Derivative Litig.*, 445 F. Supp. 3d 508, 527 (N.D. Cal. 2020), aff’d, 845 F. App’x
27 563 (9th Cir. 2021) (approving hourly rates up to \$1,075 for partners and \$660 for
28 associates); *In re Toyota*, 2013 WL 12327929, at *33 n.13 (approving rates up to
\$950 per hour over ten years ago in automotive class action); *Schroeder v. Envoy*
Air, Inc., No. CV 16-4911-MWF (KSX), 2019 WL 2000578, at *8 (C.D. Cal. May
6, 2019) (approving rates of up to \$890 for partners and up to \$750 for senior
associates).

1 in this District and reasonable here given the skill, experience, and reputation of
2 Settlement Class Counsel—all of whom the Court appointed through a competitive
3 leadership application process. *See, e.g., In re Volkswagen “Clean Diesel” Mktg.,*
4 *Sales Practices, & Prods. Liab. Litig.*, No. 2672 CRB (JSC), ECF 3396-2 ¶ 29
5 (N.D. Cal. June 30, 2017) (noting that the average blended rate of 40 class action
6 settlements approved in that District in 2016 and 2017 was \$528.11 per hour);
7 *Herrera v. Wells Fargo Bank, N.A.*, No. 8:18-CV-00332-JVS-MRW, 2021 WL
8 9374975, at *13 (C.D. Cal. Nov. 16, 2021) (approving a blended rate of
9 approximately \$613 per hour); *Perez v. Rash Curtis & Assocs.*, No. 4:16-cv-03396-
10 YGR, 2020 WL 1904533, at *20 (N.D. Cal. Apr. 17, 2020) (reviewing cases and
11 finding blended rate of \$634.48 to be reasonable).

12 Finally, available data on the average rates charged in this district provides
13 still further evidence in support of the rates used. Specifically, the “Real Rate
14 Report identifies attorney rates by location, experience, firm size, areas of expertise
15 and industry, as well as specific practice areas, and is based on actual legal billing,
16 matter information, and paid and processed invoices from more than eighty
17 companies.” *Rolex Watch USA Inc. v. Zeotec Diamonds Inc.*, No. CV 02-1089 PSG
18 (VBKx), 2021 WL 4786889, at *3 (C.D. Cal. Aug. 24, 2021). “[N]umerous courts
19 in this District and elsewhere have turned to the annual Real Rate Report as a
20 helpful guide.” *Sarabia v. Ricoh USA, Inc.*, No. 820 CV 00218 JLS KES(x), 2023
21 WL 3432160, at *8 (C.D. Cal. May 1, 2023) (collecting cases).

22 The most recent published Real Rate Report²⁵ supports the reasonableness of
23 the hourly rates reflected in the CBO. *See* Co-Lead Decl. ¶¶ 30-31; *see also Grey*
24 *Fox, LLC*, 2024 WL 4267431, at *5 (noting that the 2023 Real Rate Report has
25 been a useful guidepost in measuring the reasonableness of hourly rates in the

26 _____
27 ²⁵ After the 2023 publication, the Real Rate Report changed its publication model
28 and no longer publishes an annual, downloadable report. However, the most recent
published version from 2023 remains relevant to assessing the reasonableness of
fees despite not accounting for recent inflation or the increase in market rates.

1 Central District of California). Specifically, it reflects an average hourly rate of
2 \$867 for litigation partners in Los Angeles, ranging from \$525 (for the first
3 quartile) to \$1,159 (for the third quartile). Co-Lead Decl., ¶ 31 and Ex. C, at 16. For
4 Los Angeles litigation associates, hourly rates range from \$431 (for the first
5 quartile) to \$880 (for the third quartile), with an average hourly rate of \$674. *Id.*
6 These figures are well in line with those charged here and further evidence the
7 reasonableness of Settlement Class Counsel’s rates.

8 **c. Settlement Class Counsel’s performance and the**
9 **results achieved justify a reasonable lodestar**
10 **multiplier.**

11 The Ninth Circuit embraces an upward lodestar multiplier on the basis of
12 certain “reasonableness” factors, including the quality of representation, the
13 complexity of the issues presented, and most importantly, the benefit obtained for
14 the class.²⁶ *See, e.g., Stetson v. Grissom*, 821 F.3d 1157, 1166 (9th Cir. 2016);
15 *Kerr v. Screen Extras Guild, Inc.*, 526 F.2d 67, 70 (9th Cir. 1975); *In re Bluetooth*,
16 654 F.3d at 942.

17 Based on Settlement Class Counsel’s estimated lodestar multiplier at the
18 preliminary approval stage of between 2.04 and 2.13, the Court found the
19 Settlement, including the fee request, as likely to be reasonable. Prelim. Order at
20 26. Settlement Class Counsel confirm that the lodestar of \$10,101,168.46 (using the
21 CBO capped rates) yields a modest multiplier of 1.92 for work performed in
22 furtherance of Plaintiffs’ claims against the Settling Defendants, including time

23 ²⁶ The “reasonableness” factors are (1) the time and labor required, (2) the novelty
24 and difficulty of the questions involved, (3) the skill requisite to perform the legal
25 service properly, (4) the preclusion of other employment by the attorney due to
26 acceptance of the case, (5) the customary fee, (6) whether the fee is fixed or
27 contingent, (7) time limitations imposed by the client or the circumstances, (8) the
28 amount involved and the results obtained, (9) the experience, reputation, and ability
of the attorneys, (10) the “undesirability” of the case, (11) the nature and length of
the professional relationship with the client, and (12) awards in similar cases. *Kerr*,
526 F.2d at 70.

1 anticipated for the on-the-ground work necessary to implement, oversee, and
2 protect this Settlement through an eighteen month claims period and any potential
3 appeals. Co-Lead Decl. ¶¶ 22-23.

4 This multiplier is well-supported by the facts and history here, particularly
5 given the contingent nature of Settlement Class Counsel’s work and related risk of
6 no recovery at all. Moreover, the result obtained in the face of the significant
7 challenges Settlement Class Counsel faced and the enormous effort undertaken in
8 this six-years-long litigation fully justifies the modest multiplier requested. *See*
9 §§ II.B, IV.A.2, *supra*.

10 **d. The requested multiplier is squarely in line with those**
11 **routinely approved in this Circuit.**

12 While the facts and history of this case alone provide ample support for the
13 requested multiplier, the request is also within the “presumptively acceptable range
14 of 1.0-4.0” in this Circuit. *Dyer v. Wells Fargo Bank, N.A.*, 303 F.R.D. 326, 334
15 (N.D. Cal. 2014); *Ochinero v. Ladera Lending, Inc.*, No. SACV 19-1136 JVS
16 (ADSx), 2021 WL 4460334, at *8 (C.D. Cal. July 19, 2021) (“[L]odestar
17 multipliers of 1.5 to 3.0 are most common . . .”).

18 Consistent with this presumption, Courts routinely approve multipliers at or
19 above those here. This includes settlements with a percentage of the fund near or
20 above the benchmark 25% of the fund as well. *See Vizcaino*, 290 F.3d at 1051 n.6
21 (approving 3.65 multiplier, and citing appendix of cases showing “a range of 0.6-
22 19.6, with most . . . from 1.0-4.0 and a bare majority . . . in the 1.5-3.0 range”); *see*
23 *also In re ZF-TRW ACUs Toyota Final App.*, 2023 WL 9227002, at *16 (approving
24 multiplier of 2.35 in the Toyota settlement in this litigation); *In re ZF-TRW ACUs*
25 *Mitsu Final App.*, ECF 1039 at 17, (same with multiplier of 2.02); *Fleming v.*
26 *Impax Lab ’ys Inc.*, No. 16-cv-06557, 2022 WL 2789496, at *9 (N.D. Cal. July 15,
27 2022) (awarding 30% in attorneys’ fees on a \$33 million common fund and noting
28

1 that 2.6 lodestar multiplier confirmed reasonableness of the request);²⁷ *Kendall v.*
2 *Odonate Therapeutics, Inc.*, No. 20-cv-01828, 2022 WL 1997530, at *7 (S.D. Cal.
3 June 6, 2022) (33.3% fee representing a 2.36 multiplier was reasonable for a \$12.8
4 million settlement); *Steiner v. Am. Broad. Co.*, 248 Fed. App'x 780, 783 (9th Cir.
5 2007) (approving a multiplier of 6.85); ECF 761-1 (compendium chart of cases
6 with percentage near or above the benchmark 25%, and with a lodestar multiplier of
7 approximately 2.5 or above); ECF 815 at 42 (information on multipliers and related
8 fee studies in Plaintiffs' final approval brief for the Toyota settlement).

9 Settlement Class Counsel's requested multiplier—2.0 including anticipated
10 future time and 1.92 without, *see* Co-Lead Decl. ¶¶ 21-23—is a reasonable and
11 appropriate multiplier, based on both the record in this case and with reference to
12 awards regularly made in this Circuit.

13 **B. Settlement Class Counsel's expenses are reasonable.**

14 Settlement Class Counsel may “recover their reasonable expenses that would
15 typically be billed to paying clients in non-contingency matters.” *Brown v. CVS*
16 *Pharmacy, Inc.*, No. 15-cv-7631, 2017 WL 3494297, at *9 (C.D. Cal. Apr. 24,
17 2017); *see also Staton*, 327 F.3d at 974; Fed. R. Civ. P. 23(h). This includes
18 expenses that are reasonable, necessary, and directly related to the litigation. *See*
19 *Willner v. Manpower Inc.*, No. 11-cv-2846, 2015 WL 3863625, at *7 (N.D. Cal.
20 June 22, 2015); Fed. R. Civ. P. 23(h); *see also Miller v. Ghirardelli Chocolate Co.*,
21 No. 12-CV-04936-LB, 2015 WL 758094, at *7 (N.D. Cal. Feb. 20, 2015) (same)
22 (citing *Harris v. Marhoefer*, 24 F.3d 16, 19 (9th Cir. 1994)).

23
24 ²⁷ The multiplier sought here is not identical to those sought and awarded in the
25 earlier Toyota and Mitsubishi settlements (2.35 for Toyota and 2.02 for Mitsubishi).
26 As described above, in calculating the common benefit lodestar reasonably
27 attributed to the Hyundai-Kia settlement, Settlement Class Counsel have applied
28 the same *methodology* used to calculate lodestar as in the Toyota and Mitsubishi
settlements, but the differing percentages of lodestar attributed to each settlement,
and the increasing amount of lodestar over time, yields a modestly smaller
multiplier here.

1 Here, Settlement Class Counsel seek \$400,000 in litigation expenses
2 incurred. This includes \$389,814.63 in funds expended by Lead Counsel and PSC
3 firms to advance the common benefit, and \$10,185.37 that Settlement Class
4 Counsel are responsibly reserving to cover the anticipated costs associated with the
5 future on-the-ground administration and Settlement implementation efforts. Co-
6 Lead Decl. ¶¶ 32-33. At approximately 0.64% of the Settlement value, these costs
7 are *significantly* less than the average costs awarded in class action settlements.
8 Theodore Eisenberg & Geoffrey P. Miller, *Attorney Fees and Expenses in Class*
9 *Action Settlements: 1993–2008*, 7 J. Empirical Legal Stud. 248, 267 (2010) (mean
10 and median of 2.8% and 1.7% before 2002 and 2.7% and 1.7% thereafter);
11 Theodore Eisenberg et. al., *Attorneys' Fees in Class Actions: 2009-2013*, 92 N.Y.U.
12 L. Rev. 937, 963 (2017) (mean and median of 3.9% and 1.7% since 2009).

13 More importantly, these costs are commensurate with the stakes, complexity,
14 and intensity of this case. For example, Settlement Class Counsel incur substantial
15 costs for eDiscovery services and the platform necessary to process, maintain, and
16 analyze multiple millions pages of documents. As explained above, they have also
17 retained experts necessary to analyze the ACU Defect and related technical and
18 engineering materials. Additionally, the costs include travel expenses related to
19 hearing attendance, as well as strategy meetings and negotiations held across the
20 United States. Co-Lead Decl. ¶¶ 33-34.

21 No doubt, this is a technical, complex case, and it has been expensive to
22 prosecute, with the portion assigned to the Settling Defendants a small share of the
23 total costs incurred thus far. As courts have recognized, “Class Counsel had a strong
24 incentive to keep expenses at a reasonable level due to the high risk of no recovery
25 when the fee is contingent.” *Gutierrez v. Amplify Energy Corp.*, No. 8:21-CV-01628
26 DOC JDEx, 2023 WL 3071198, at *7 (C.D. Cal. Apr. 24, 2023). Those incentives
27 apply equally here, and Settlement Class Counsel expended only that which they
28

1 believed was necessary to advance the interests of the Class. The requested costs
2 are reasonable and should be reimbursed.

3 **C. The Settlement Class Representatives have earned the requested**
4 **service awards through years of dedication to this case.**

5 Settlement Class Counsel request service awards of \$2,500 for each of the
6 Settlement Class Representatives. These awards, to be paid from the Settlement
7 fund, recognize the time and effort each Settlement Class Representative dedicated
8 to the case. At preliminary approval, this Court determined that, given the
9 Settlement Class Representatives’ “active role in the litigation, the number of hours
10 spent on the case, and the six-year period that it has been pending, incentive awards
11 in the amount of \$2,500 are reasonable.” Prelim. Order at 22.

12 That conclusion remains sound. The requested amount is but half of the
13 \$5,000 “presumptively reasonable” award in this Circuit, and the time and effort the
14 proposed Representatives dedicated to prosecuting this case clearly supports the
15 request here. *In re CRT*, 2016 WL 4126533, at *11. *See also, e.g., In re ZF-TRW*
16 *ACUs Toyota Prelim. App.*, 2023 WL 6194109, at *18 (finding \$2,500 to be a
17 “reasonable” service award for Toyota settlement in this litigation); *In re ZF-TRW*
18 *ACUs Toyota Final App.*, 2023 WL 9227002, at *13 (same on final approval for
19 Toyota settlement); *Cisneros v. Airport Terminal Servs. Inc.*, No. 2:19-CV-02798-
20 VAP-SPx, 2021 WL 3812163, at *9 (C.D. Cal. Mar. 26, 2021) (“Courts have
21 generally found that \$5,000 incentive payments are reasonable.”); *In re Online*
22 *DVD-Rental Antitrust Litig.*, 779 F.3d 934, 943 (9th Cir. 2015) (affirming awards of
23 \$5,000); *In re Mego*, 213 F.3d at 463 (same).

24 The Settlement Class Representatives have demonstrated unwavering
25 commitment to advancing this case on behalf of the Class. Their efforts included:
26 (1) providing extensive factual information to assist counsel in drafting the
27 complaints; (2) regularly communicating with counsel to stay informed about
28 progress in the litigation; (3) searching for and producing relevant materials in

1 discovery; (4) collaborating with counsel to prepare and finalize detailed
2 Interrogatory responses; (5) evaluating the terms of the proposed Settlement with
3 counsel; and (6) expressing their continued willingness to protect the Class through
4 final approval and Settlement administration. Co-Lead Decl. ¶¶ 8-9.

5 Settlement Class Counsel estimates that these efforts conservatively required
6 at least 30 hours of time from each Hyundai-Kia Plaintiff over the course of the
7 litigation. *Id.* ¶ 9. The service awards requested are well-earned.

8 **V. CONCLUSION**

9 Settlement Class Representatives and Settlement Class Counsel respectfully
10 request that the Court certify the Hyundai-Kia Settlement Class; appoint Settlement
11 Class Counsel and Settlement Class Representatives; grant final approval of the
12 Settlement; approve an aggregate award of \$20,493,033.30 million in attorneys’
13 fees and expenses to be allocated by Co-Lead Counsel among firms performing
14 work under the CBO; and award \$2,500 to each Settlement Class Representative as
15 a service award.

16 Dated: July 15, 2025

/s/ Roland Tellis _____

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CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record, including counsel for Defendants.

/s/ Adam Tamburelli

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12 *Co-Lead Counsel for Plaintiffs*

13
14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16

17 *In re ZF-TRW Airbag Control Units*
18 *Products Liability Litigation*

MDL No. 2905

Case No. 2:19-ml-02905-JAK

19 ALL CASES AGAINST THE
20 HYUNDAI-KIA AND MOBIS
21 DEFENDANTS

**JOINT DECLARATION OF
PLAINTIFFS' CO-LEAD COUNSEL IN
SUPPORT OF THE HYUNDAI-KIA
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, AND AWARD OF
ATTORNEYS' FEES, EXPENSES, AND
SERVICE AWARDS TO SETTLEMENT
CLASS REPRESENTATIVES**

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1 **DECLARATION OF ROLAND TELLIS AND DAVID STELLINGS**

2 We, Roland Tellis and David Stellings, declare as follows:

3 1. Roland Tellis is an attorney licensed to practice before this Court and
4 all courts of the State of California. David Stellings is admitted to practice before
5 this Court *pro hac vice*. We are partners in the law firms of Baron & Budd, P.C. and
6 Lieff Cabraser Heimann & Bernstein, LLP, respectively, and were appointed by this
7 Court as Co-Lead Counsel for Plaintiffs in the above-captioned matter. ECF 106.

8 2. We have personal knowledge of the following facts, and if called as
9 witnesses, we could and would testify competently to them. We make this
10 declaration in support of the Hyundai-Kia Plaintiffs’ Motion for Final Approval of
11 Class Action Settlement, and award of attorneys’ fees, expenses, and service awards
12 to Settlement Class Representatives under FED. R. CIV. P. 23(e), (h).

13 **Litigation And Settlement History**

14 3. Investigating and prosecuting this complex litigation to date has
15 required significant work, effort, and expense over the course of more than six
16 years. Prior to reaching the Settlement with the Settling Defendants, the Plaintiffs
17 and proposed Settlement Class Counsel conducted a comprehensive factual
18 investigation into Plaintiffs’ allegations, which involves a highly technical
19 automotive defect. Plaintiffs propounded requests for production to the domestic
20 Hyundai and Kia entities and jurisdictional discovery requests to their Korean
21 parent companies, as well as jurisdictional discovery to Hyundai Mobis. Plaintiffs
22 also served non-jurisdictional factual discovery on Hyundai’s parent company. The
23 Parties also met and conferred extensively about this discovery and a variety of
24 other topics, including the Hyundai and Kia Defendants’ collection and sources of
25 ESI.

26 4. Plaintiffs have also engaged in extensive discovery with the principal
27 suppliers and designers for the defective parts in the Hyundai and Kia Subject
28 Vehicles—the ZF-TRW and ST Defendants—to develop their understanding of the

1 ACU Defect in those Subject Vehicles and, relatedly, their case against the Settling
2 Defendants. The supplier Defendants have produced or made available more than
3 three million pages of documents relevant to Plaintiffs' claims and the alleged ACU
4 Defect in this case. The Settling Defendants themselves produced approximately
5 250,000 pages of documents. Plaintiffs' review and synthesis of the documents and
6 electronically stored information produced to date, as well as other independent
7 research and expert work, culminated in the filing of the operative 1,300-page,
8 factually detailed Amended Consolidated Class Action Complaint.

9 5. Settlement Class Counsel have reviewed and analyzed the extensive
10 set of relevant documents produced by the Settling Defendants and the other
11 Defendants, as well as material they obtained through their own investigative
12 efforts, to inform Plaintiffs' understanding of the strengths and weaknesses of their
13 claims against the Settling Defendants. In addition, Settlement Class Counsel
14 reviewed responses to multiple sets of interrogatories and requests for admission
15 served on multiple Defendants.

16 6. Following the appointment of Settlement Special Master, Patrick A.
17 Juneau, Esq., we spent considerable time and resources in arm's length settlement
18 negotiations with the Settling Defendants' counsel for approximately two and a half
19 years. The parties participated in a series of settlement discussions and related
20 information exchange (with a pause to resume motion to dismiss briefing at one
21 point), in a process overseen by the late, Court-appointed Settlement Special Master
22 through the material terms of agreement. The parties reached agreement on material
23 terms for a settlement in the fall of 2024 and spent the next several months drafting
24 and finalizing the Settlement Agreement before the Court.

25 **Settlement Benefits And Anticipated Recovery**

26 7. The Settlement benefits are discussed at length in the Court's
27 preliminary Approval Order (ECF 1036). In short, the Settlement secures a non-
28 reversionary Settlement Amount of \$62,100,100, inclusive of commitments, to the

1 benefit of the proposed Settlement Class. It also provides other valuable benefits to
2 Settlement Class members, including a 10-year Extended New Parts Warranty
3 valued by a leading warranty expert at \$13,600,000 in economic value for Hyundai-
4 Kia Class Members with Recalled Vehicles, and additional prospective value of at
5 least \$50,500,000 for Unrecalled Vehicles, along with a 10-year Settlement
6 Inspection Program, which will benefit all Settlement Class members by mandating
7 procedures for the active investigation and documentation of airbag non-
8 deployments in Subject Vehicles that may be caused by electrical overstress.

9 **The Settlement Class Representatives**

10 8. The Hyundai-Kia Plaintiffs, who all seek to be Settlement Class
11 Representatives, have actively participated in this litigation and will continue to
12 vigorously protect the interests of the class, as they have throughout this litigation.
13 The Hyundai-Kia Plaintiffs understand their duties as Settlement Class
14 Representatives and have agreed to consider the interests of absent Settlement Class
15 members. The Hyundai-Kia Plaintiffs have reviewed and uniformly endorsed the
16 Settlement terms and have no interests that would be in conflict with the Settlement
17 Class members. Each Settlement Class Representative has also expressed their
18 continued willingness to protect the Settlement Class until the Settlement is finally
19 approved and its administration completed.

20 9. Over the past six years, each Hyundai and Kia Plaintiff devoted
21 significant time to serve the interests of the Settlement Class, by, among other
22 things: providing extensive factual information to assist counsel with drafting the
23 complaints; regularly communicating with counsel to stay abreast of developments
24 in this litigation; searching for relevant and responsive materials about their Subject
25 Vehicles, and providing those materials to counsel for production in discovery;
26 conferring with counsel to prepare and finalize detailed responses to
27 Interrogatories; working with counsel to review and evaluate the terms of the
28

1 proposed Settlement Agreement; and expressing their continued willingness to
2 protect the Class until the Settlement is approved and its administration completed.

3 10. Considering the extensive efforts required to prosecute this case and
4 serve the Settlement Class, we estimate that each Hyundai-Kia Plaintiff spent at
5 least 30 hours on the litigation. For their longstanding commitment and
6 contributions to the case, Counsel submit that these individuals have earned the
7 moderate requested service awards of \$2,500.

8 **Time And Expense Submission**

9 11. Pursuant to the Court-entered Common Benefit Order (“CBO”), ECF
10 111, Liaison Counsel, each participating Plaintiff Steering Committee (“PSC”) firm,
11 as well as other counsel authorized by Co-Lead Counsel to perform common
12 benefit work, submitted monthly time and expense reports to our firms. Co-Lead
13 Counsel, Liaison Counsel and members of the PSC (along with members and staff
14 of their respective firms), and other counsel expressly authorized by Co-Lead
15 Counsel to perform work that may be considered for common benefit compensation
16 are collectively referred to as “Participating Counsel” below.

17 12. The CBO imposes limitations on the hourly rates for Participating
18 Counsel of \$895/hour for partners; \$350-\$600/hour for associates; \$415/hour for
19 document review attorneys; and \$175-\$275/hour for paralegals and assistants. *See*
20 ECF 111 at 5-6. These rates were fixed in March 2020, and have not been adjusted
21 for inflation or otherwise increased in the five+ years since. For many timekeepers,
22 these Court-capped hourly rates fall materially below their standard and customary
23 rates. The CBO also imposes limitations on reimbursable expenses. *Id.* at 4-5.

24 13. Attorneys and staff working at our direction and under our supervision
25 collected these common benefit submissions and have maintained a database of all
26 submitted time and expenses. These attorneys and staff reviewed and (using best
27 reasonable efforts) audited the submissions to ensure that only time and expenses
28 that inured to the benefit of the Settlement Class and that advanced the claims

1 resolved in the Settlement have been included in the time and costs presented in the
2 fee motion.

3 **Hours Incurred and Rates Billed**

4 14. For the reasons discussed below, we respectfully submit that the
5 attorneys' fees, costs, and expenses requested in the accompanying motion are
6 reasonable.

7 15. This is a large and complex MDL and involves numerous law firms on
8 both sides of the litigation. As Court-appointed Co-Lead Counsel, we are charged,
9 among other duties, to oversee and supervise all Participating Counsel and to
10 ensure compliance with the rules and guidelines for work performed and expenses
11 incurred for the common benefit of all Plaintiffs in this MDL, including the
12 Hyundai-Kia Plaintiffs. In this capacity, we have ensured the reasonable, effective,
13 and efficient prosecution of this litigation and the Hyundai-Kia Plaintiffs' Claims.
14 To that end, we have encouraged the attorneys working on this matter to perform
15 assignments efficiently, including by using the resources and guidance of
16 experienced attorneys on the case. We believe this approach has saved time spent
17 on the litigation overall, with the benefit of insight, guidance, and experience on
18 discrete litigation and strategy issues.

19 16. Through March 31, 2025, using the capped and reduced billing rates
20 set by the Court in the CBO, the *total* lodestar for the common benefit work
21 performed by Participating Counsel in this case is \$64,739,461.50. The total
22 lodestar applying each timekeeper's standard and routinely Court-approved market
23 hourly rates, where available, is \$78,265,905.¹

24 17. From these top line numbers, we subtract the lodestar previously
25 allocated to the earlier Toyota Settlement (\$11,520,547.22 with capped rates, and

26 _____
27 ¹ Counsel submit lodestar data through March 31, 2025 in support of this motion.
28 Substantial work on the Hyundai-Kia litigation and settlement were incurred up to
that date, with additional time thereafter included in Counsel's reasonable
projections of future work to be incurred.

1 \$12,800,004.84 with market rates), and Mitsubishi Settlement (\$1,418,050.37 with
2 capped rates, and \$1,618,188.94 with market rates).

3 18. The remaining total “adjusted lodestar” to date, using the capped and
4 reduced hourly rates set by the Court in the CBO, is \$51,800,863.91. The total
5 adjusted lodestar with each timekeeper’s standard and routinely Court-approved
6 hourly rates is \$63,847,711.22, for a reduction of approximately 18.8%
7 (\$12,046,847.31 million) from the market-rate fees of participating counsel.

8 19. In our professional judgment and based on our familiarity with the
9 work performed at our direction, we estimate the work fairly and reasonably
10 attributed to efforts that benefited the Hyundai-Kia Settlement Class and the
11 prosecution of their claims against the Settling Defendants as follows: from the
12 total hours worked, 65% of the efforts are attributable to the six Vehicle
13 Manufacturer Defendants, and the remaining 35% of work is specific to the two
14 supplier Defendants (ZF and ST Micro), recognizing that much of the work for the
15 suppliers also advances the claims against the Vehicle Manufacturer Defendants,
16 and that finally-approved settlements with two of five Vehicle Manufacturer groups
17 to date mean that the relative time and efforts dedicated to the Suppliers have and
18 will increase over time as the litigation proceeds (resulting here in a modest
19 adjustment to the prior allocation of 70% of time to the vehicle manufacturers in the
20 previous two settlements).

21 20. Within the amount allotted to the Vehicle Manufacturer Defendants,
22 we estimate approximately 30% of that work is reasonably associated with the
23 Settling Defendants. This apportionment is supported by: (a) the size and scale of
24 the Settlement Class, which cover approximately 3.7 million of the 15 million Class
25 Vehicles at issue in this consolidated litigation; (b) efforts in responding to the
26 Settling Defendants’ and the other Defendants’ joint pleading challenges to
27 Plaintiffs’ Consolidated Class Action Complaint; (c) the discovery, investigative
28 and expert work that developed and advanced the Hyundai-Kia Plaintiffs’ claims to

1 this favorable resolution; and (d) the focused time and efforts to develop and
2 negotiate the Settlement terms with the Settling Defendants over the course of
3 approximately two and a half years.

4 21. Pursuant to the formula above, based on time through March 31, 2025,
5 in furtherance of the work described above associated with the Hyundai-Kia
6 Plaintiffs' claims against the Settling Defendants, among other tasks and
7 responsibilities, and pursuant to the terms of the CBO, lodestar resulting from those
8 hours using the capped and reduced billing rates set by the Court in the CBO is
9 \$10,101,168.46, and the average billing rate is approximately \$602. Using this time
10 alone, the lodestar multiplier resulting from Settlement Class Counsel's fee request
11 is 2.0.

12 22. However, even more work will be required to: (1) obtain final approval
13 of the Settlement; (2) protect the Settlement on appeal (if any appeals are lodged);
14 and (3) oversee and help implement the Settlement until the end of the Claims
15 Period, which will include, among other things, responding to inquiries from
16 Settlement Class members who owned or leased one of the approximately 3.7
17 million Hyundai and Kia Subject Vehicles.

18 23. We anticipate that Settlement Class Counsel hereafter will incur no
19 fewer than approximately 575 hours (\$375,000 in lodestar, at an estimated rate of
20 \$650 per hour, assuming a reasonable mix of partner and associate work to come)
21 to finalize, protect, and implement the Settlement. This brings the total lodestar to
22 \$10,476,168.48 and yields a multiplier of 1.92.

23 24. Attached as **Exhibit A** to this declaration is a spreadsheet that presents
24 a summary of the common benefit work performed by Participating Counsel. The
25 spreadsheet is organized by the 13 specific task categories set forth in the CBO, and
26 lists the law firms, names, positions, number of hours worked, hourly rate, and fees
27 for each of the attorney and staff members who performed the common benefit
28 work, and formatted in substantially the same form as the model spreadsheet in

1 Exhibit G of the Court’s Standing Order, with some minor adjustments to the
2 formatting due to the size and scope of the data.

3 25. Attached as **Exhibit B** to this declaration is a spreadsheet that presents
4 the same information as Exhibit A, but organized by attorney/staff member, and
5 includes a grand total of all the fees across all timekeepers and all law firms, and
6 formatted in substantially the same form as the model spreadsheet in Exhibit G of
7 the Court’s Standing Order, with some minor adjustments to the formatting due to
8 the size and scope of the data.

9 26. As Exhibits A and B demonstrate,² Participating Counsel expended
10 significant hours on Pleadings, Briefs, and Legal Research. This includes, among
11 other things: (1) investigating, researching and drafting a 500+ page Consolidated
12 Amended Complaint and a 1,300+ page Amended Consolidated Class Action
13 Complaint; and (2) analyzing, researching, and drafting complex motion to dismiss
14 briefing, as well as the settlement approval briefing. All of this was essential to
15 informing the strengths and weaknesses of the Hyundai-Kia Plaintiffs’ claims, and
16 critical to the success of the case.

17 27. Discovery and Document Review also comprise a significant portion
18 of the total hours billed. But it bears repeating that the Defendants have collectively
19 produced many millions of pages of documents in this MDL, including
20 approximately 250,000 pages from the Settling Defendants themselves, many of
21 which were relevant to the Hyundai-Kia Plaintiffs’ claims and the ACU Defect that
22 underlies them.

23
24 _____
25 ² As explained above, the data in Exhibits A and B reflects the complete data of
26 lodestar incurred in this litigation to date, and not the “adjusted lodestar” that
27 accounts for the lodestar previously recovered in the Toyota and Mitsubishi
28 settlements. For that reason, the total case lodestar data reflected in the Exhibits
submitted herewith is higher than the “adjusted lodestar” reported here, because the
lodestar data in the Exhibits is comprehensive and includes all data, including the
lodestar that was previously attributed to (and awarded for) Toyota and Mitsubishi.

1 28. Analyzing those documents was a massive undertaking that
2 encompassed much more than simple “doc review,” as some (improperly)
3 understand that term. To streamline the review of MDL documents for this
4 litigation, we—along with attorneys at our firms working under our supervision—
5 developed and honed targeted search terms to isolate documents relevant to the
6 ACU Defect and its symptoms, and Defendants’ analyses thereof, and also
7 developed a nuanced coding panel and trained attorneys in its use and in the case
8 contours. Those attorneys then carefully reviewed, analyzed, and coded the Settling
9 Defendants’ and other Defendants’ productions. That analysis and coding was
10 reviewed for quality control. In short, all of this time was essential in understanding
11 the strengths and weaknesses of the case.

12 **Settlement Class Counsel’s Billing Rates Are Reasonable**

13 29. Settlement Class Counsel are highly skilled practitioners with
14 significant experience litigating complex class actions, including automotive defect
15 class actions. As such, the capped billing rates identified above are reasonable.
16 Further, these rates are in line with the prevailing market rates. Indeed, courts in
17 this Circuit routinely approve similar or higher hourly rates to those here in
18 complex class action cases like this. *See, e.g., In re ZF-TRW ACUs Mitsu Final*
19 *App.*, ECF 1039 at 16-17 (this Court approving the hourly rates fixed in the CBO
20 three months ago based on precedent and recent data from the Real Rate Report for
21 the Los Angeles market); *In re ZF-TRW Airbag Control Units Prods. Liab. Litig.*,
22 No. LA ML 19-02905 JAK, 2023 WL 6194109, at *22-23 (C.D. Cal. July 31,
23 2023); *In re: ZF-TRW Airbag Control Units Prods. Liab. Litig.*, No. LA ML 19-
24 02905 JAK, 2023 WL 9227002, at *16 (C.D. Cal. Nov. 28, 2023); *Grey Fox, LLC v.*
25 *Plains All-Am. Pipeline, L.P.*, No. CV 16-03157 PSG (JEMX), 2024 WL 4267431,
26 at *5-6 (C.D. Cal. Sept. 17, 2024) (approving fees with lodestar crosscheck using
27 Lieff Cabraser’s hourly rates of \$745 to \$1,380 for partners, \$345 to \$720 for
28 associates, and \$345 to \$535 for paralegals/research staff); *Katz-Lacabe v. Oracle*

1 *Am., Inc.*, No. 3:22-CV-04792-RS, 2024 WL 4804974, at *5 (N.D. Cal. Nov. 15,
2 2024), appeal dismissed, No. 24-7650, 2025 WL 1703624 (9th Cir. Apr. 3, 2025)
3 (same); *Ramirez v. Trans Union, LLC*, No. 12-CV-00632-JSC, 2022 WL 17722395,
4 at *9 (N.D. Cal. Dec. 15, 2022) (approving hourly rates ranging “from \$1,325 to
5 \$560 for partners and associates, and \$485-\$455 for ‘litigation support’ and
6 paralegals”); *Gutierrez, JR. v. Amplify Energy Corp.*, No. 8:21-cv-01628-DOC
7 (JDEx) (C.D. Cal. Jan. 26, 2023), ECF Nos. 667, 726 (standard hourly rates of
8 \$650-\$1,010/hour for partners, \$640-\$675/hour for associates, and \$525/hour for
9 discovery/document review attorneys were “consistent with market rates”); *In re*
10 *Wells Fargo & Co. S’holder Derivative Litig.*, 445 F. Supp. 3d 508, 527 (N.D. Cal.
11 2020), *aff’d*, 845 F. App’x 563 (9th Cir. 2021) (approving hourly rates up to \$1,075
12 for partners and \$660 for associates); *Waldrup v. Countrywide Fin. Corp.*, No.
13 213CV08833CASAGR, 2020 WL 13356468, at *2 (C.D. Cal. July 16, 2020)
14 (approving Baron & Budd’s hourly rates of \$825 to \$975 for partners, and \$495 to
15 \$625 for associates, requested at ECF 479-1 at 16); *In re Toyota Motor Corp.*
16 *Unintended Acceleration Mktg., Sales Pracs., & Prod. Liab. Litig.*, No.
17 810ML02151JVSMOX, 2013 WL 12327929, at *33 (C.D. Cal. July 24, 2013)
18 (approving rates up to \$950 per hour over ten years ago in automotive class action);
19 *Schroeder v. Envoy Air, Inc.*, No. CV 16-4911-MWF (KSX), 2019 WL 2000578, at
20 *8 (C.D. Cal. May 6, 2019) (approving rates of up to \$890 for partners and up to
21 \$750 for associates); *Keegan v. Am. Honda Motor Co., Inc.*, No. CV1009508
22 MMM AJW(x), 2014 WL 12551213, at *23 (C.D. Cal. Jan. 21, 2014) (approving
23 class counsel’s hourly rates up to \$875 for partners and \$595 for associates).

24 30. Additionally, empirical data regarding the average rates charged in this
25 District supports the reasonableness of Settlement Class Counsel’s billing rates.
26 Specifically, the “Real Rate Report identifies attorney rates by location, experience,
27 firm size, areas of expertise and industry, as well as specific practice areas, and is
28 based on actual legal billing, matter information, and paid and processed invoices

1 from more than eighty companies.” *Rolex Watch USA Inc. v. Zeotec Diamonds Inc.*,
2 No. CV 021-089 PSG VBK(x), 2021 WL 4786889, at *3 (C.D. Cal. Aug. 24, 2021);
3 *see also Grey Fox, LLC*, 2024 WL 4267431, at *5 (noting that the 2023 Real Rate
4 Report has been a useful guidepost in measuring the reasonableness of hourly rates
5 in the Central District of California).

6 31. The 2023 Real Rate Report, based on data collected through Q2 of
7 2023 (i.e., not adjusted for the subsequent inflation in the last year), reflects an
8 average hourly rate of \$867 for litigation partners in Los Angeles, ranging from
9 \$525 (for the first quartile) to \$1,159 (for the third quartile). For Los Angeles
10 litigation associates, hourly rates are \$431-\$880 per-hour, with an average hourly
11 rate of \$674. An excerpted copy of the 2023 Real Rate Report is attached as
12 **Exhibit C** to this declaration.

13 **Costs Incurred**

14 32. Settlement Class Counsel seek reimbursement of \$400,000 in litigation
15 expenses. This includes \$389,814.63 in costs already incurred for the benefit of the
16 Class, as well as \$10,185.37 in projected costs that Settlement Class Counsel is
17 responsibly reserving to cover expenses associated with the on-the-ground
18 enforcement and assistance efforts this Settlement will require—including, for
19 example, protecting the settlement until after all potential appeals are resolved. The
20 CBO imposes limitations on travel and other costs to further ensure the
21 reasonableness thereof.

22 33. In Table 1, below, the requested costs are broken down by the
23 categories enumerated in Exhibit B to the Common Benefit Order. *See* ECF 111,
24 Ex. B. To arrive at the costs attributed to the Hyundai-Kia Settlement for
25 reimbursement, Settlement Class Counsel took the total values of expenses incurred
26 through March 31, 2025, and then subtracted from those totals the expense amounts
27 previously allocated and awarded in the Toyota and Mitsubishi Settlements. From
28 there, Settlement Class Counsel then applied the framework described in

1 paragraphs 16-18 above to the remaining the common benefit expenses incurred,
 2 further reduced based on reasonable billing judgment, and then included certain
 3 costs specifically attributable only to the Hyundai-Kia Plaintiffs’ claims and to
 4 effectuating and supporting the proposed Settlement. In those ways, Settlement
 5 Class Counsel reasonably and fairly allocate the costs attributable to the Plaintiffs’
 6 claims against the Settling Defendants.

7 **Table 1**

Costs by Category	
CBO Category	Common Benefit Costs
1 - Assessment Fees	N/A
2 - Federal Express / Local Courier, etc.	\$2,745.02
3 - Postage Charges	\$191.92
5 - Long Distance	\$79.56
6 - In-House Photocopying	\$1,204.18
7 - Outside Photocopying	\$702.62
8 – Hotels	\$14,566.61
9 – Meals	\$3,736.43
11 - Air Travel	\$24,290.13
12 - Deposition Costs	\$115.40
13 – Lexis/Westlaw	\$30,670.03
14 - Court Fees	\$2,624.10
15 - Witness / Expert Fees	\$169,460.20
16 - Investigation Fees / Service Fees	\$9,730.80
17 – Transcripts	\$207.50
18 - Ground Transportation	\$5,014.46
Additional expenses not included in CBO categories:	
eDiscovery Platform	\$118,271.11

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Costs by Category	
CBO Category	Common Benefit Costs
Settlement Special Master	\$6,204.56
Subtotal	\$389,814.63
Reserved	\$10,185.37
Total	\$400,000

34. A significant cost (\$118,271.11) was for the eDiscovery services and document processing platform. Although not included as a category in the CBO, this cost was necessary for processing, maintaining, and analyzing the millions of pages of documents produced in this case, with the costs incurred based on competitive market rates for document and large scale data hosting.

35. Settlement Class Counsel incurred additional material expenses for experts. This is not surprising given the technical nature of the ACU Defect at issue in this litigation and the efforts undertaken to resolve it. The experts' involvement was significant and their contributions were critical to the litigation and resolution.

* * *

36. For the foregoing reasons, and those outlined in the Hyundai-Kia Plaintiffs' Motion, the Hyundai-Kia Plaintiffs seek final approval of the Settlement as well as an award of \$20,093,033 in fees and \$400,000 in costs pursuant to Federal Rule of Civil Procedure 23(h), to be allocated by Co-Lead Counsel among Participating Counsel that performed work related to the Hyundai-Kia Plaintiffs' claims against the Settling Defendants in this case.

37. Based on our significant experience in complex automotive defect class cases like this one, and Settlement Class Counsel's work in this case day in and day out for nearly six years, we are confident in the result obtained for the

1 Settlement Class Members here and the process used to reach it, and strongly
2 recommend its approval.

3

4 We declare under penalty of perjury under the laws of the State of California
5 that the foregoing is true and correct. Executed this 15th day of July 2025 at
6 Encino, California by Roland Tellis and at New York, New York by David
7 Stellings.

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/s/ Roland Tellis

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Roland Tellis

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/s/ David Stellings

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David Stellings

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EXHIBIT A

Exhibit A - Summary of Hours and Lodestar Organized by Task Codes

Task Category 1: Lead Counsel Duties						
Firm	Timekeeper	Standard Hourly Rate	Reduced Hourly Rate	Hours	Standard Hourly Lodestar	Reduced Hourly Lodestar
Baron & Budd, P.C.	BENAVIDEZ, ERNEST (Paralegal)	\$250.00	\$250.00	147.2	\$36,800.00	\$36,800.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Associate)	\$795.00	\$600.00	69.1	\$54,934.50	\$41,460.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Partner)	\$795.00	\$795.00	2.1	\$1,669.50	\$1,669.50
Baron & Budd, P.C.	ROYSTER, SHANNON (Associate)	\$625.00	\$600.00	25.1	\$15,687.50	\$15,060.00
Baron & Budd, P.C.	SMILEY, ELIZABETH (Associate)	\$575.00	\$575.00	0.3	\$172.50	\$172.50
Baron & Budd, P.C.	TAMBURELLI, ADAM (Associate)	\$795.00	\$600.00	66.9	\$53,185.50	\$40,140.00
Baron & Budd, P.C.	TAMBURELLI, ADAM (Partner)	\$795.00	\$795.00	0.2	\$159.00	\$159.00
Baron & Budd, P.C.	TELLIS, ROLAND (Partner)	\$1,200.00	\$895.00	1.5	\$1,800.00	\$1,342.50
Lieff Cabraser Heimann & Bernstein, LLP	ARSOV, DUSHAN (Paralegal)	\$515.00	\$275.00	0.6	\$309.00	\$165.00
Lieff Cabraser Heimann & Bernstein, LLP	BERTRAM, ANNE (Paralegal)	\$360.00	\$275.00	4.2	\$1,512.00	\$1,155.00
Lieff Cabraser Heimann & Bernstein, LLP	BROWN, AIDAN (Paralegal)	\$525.00	\$275.00	1.5	\$787.50	\$412.50
Lieff Cabraser Heimann & Bernstein, LLP	CALANGIAN, MARGIE (Paralegal)	\$565.00	\$275.00	0.2	\$113.00	\$55.00
Lieff Cabraser Heimann & Bernstein, LLP	CHINN, VICTORIA (Staff Attorney)	\$655.00	\$415.00	3.1	\$2,030.50	\$1,286.50
Lieff Cabraser Heimann & Bernstein, LLP	DESAI, NIMISH (Partner)	\$1,115.00	\$895.00	1.6	\$1,784.00	\$1,432.00
Lieff Cabraser Heimann & Bernstein, LLP	JORDAN, CHRISTOPHER (Staff Attorney)	\$630.00	\$415.00	4.5	\$2,835.00	\$1,867.50
Lieff Cabraser Heimann & Bernstein, LLP	KAWAMURA, JENNIFER (Paralegal)	\$540.00	\$275.00	0.6	\$324.00	\$165.00
Lieff Cabraser Heimann & Bernstein, LLP	KENFIELD-KELLEHER, MURIEL (Associate)	\$655.00	\$600.00	9.6	\$6,288.00	\$5,760.00
Lieff Cabraser Heimann & Bernstein, LLP	MACATEE, MARK (Paralegal)	\$540.00	\$275.00	70.5	\$38,070.00	\$19,387.50
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Associate)	\$820.00	\$600.00	19.7	\$16,154.00	\$11,820.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Partner)	\$820.00	\$820.00	130.9	\$107,338.00	\$107,338.00
Lieff Cabraser Heimann & Bernstein, LLP	MUNOZ, CHRISTOPHER (Paralegal)	\$540.00	\$275.00	92.3	\$49,842.00	\$25,382.50
Lieff Cabraser Heimann & Bernstein, LLP	NGUYEN, PHONG-CHAU (Partner)	\$880.00	\$880.00	79.7	\$70,136.00	\$70,136.00
Lieff Cabraser Heimann & Bernstein, LLP	NICOLAOU, JOHN (Partner)	\$880.00	\$880.00	13.5	\$11,880.00	\$11,880.00
Lieff Cabraser Heimann & Bernstein, LLP	STELLINGS, DAVID (Partner)	\$1,440.00	\$895.00	99.7	\$143,568.00	\$89,231.50
Lieff Cabraser Heimann & Bernstein, LLP	TARPEH, JLE (Paralegal)	\$540.00	\$275.00	3.3	\$1,782.00	\$907.50
Lieff Cabraser Heimann & Bernstein, LLP	WILLIN, MITCHELL (Paralegal)	\$540.00	\$275.00	79.3	\$42,822.00	\$21,807.50
Total Task Category 1				927.2	\$661,983.50	\$506,992.50
Task Category 2: Investigations and Factual Research						
Firm	Timekeeper	Standard Hourly Rate	Reduced Hourly Rate	Hours	Standard Hourly Lodestar	Reduced Hourly Lodestar
Ahdoot & Wolfson	AHDOOT, ROBERT (Partner)	\$1,300.00	\$895.00	8.5	\$11,050.00	\$7,607.50
Ahdoot & Wolfson	KING, BRADLEY (Partner)	\$900.00	\$895.00	28	\$25,200.00	\$25,060.00
Ahdoot & Wolfson	MAYA, THEODORE (Partner)	\$1,100.00	\$895.00	10.1	\$11,110.00	\$9,039.50
Ahdoot & Wolfson	MCAULEY, SEAN (Paralegal)	\$250.00	\$250.00	56.4	\$14,100.00	\$14,100.00
Ahdoot & Wolfson	WOLFSON, TINA (Partner)	\$1,300.00	\$895.00	43.6	\$56,680.00	\$39,022.00
Baron & Budd, P.C.	BENAVIDEZ, ERNEST (Paralegal)	\$250.00	\$250.00	12.9	\$3,225.00	\$3,225.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Associate)	\$795.00	\$600.00	28.4	\$22,578.00	\$17,040.00
Baron & Budd, P.C.	HEILMAN, JOE (Staff Attorney)	\$415.00	\$415.00	10.5	\$4,357.50	\$4,357.50
Baron & Budd, P.C.	LICHTER, JAY MICHAEL (Associate)	\$795.00	\$600.00	22.7	\$18,046.50	\$13,620.00
Baron & Budd, P.C.	MANN, JONAS (Associate)	\$600.00	\$600.00	40.7	\$24,420.00	\$24,420.00
Baron & Budd, P.C.	ROBELOT, RYAN A. (Staff Attorney)	\$415.00	\$415.00	113.4	\$47,061.00	\$47,061.00
Baron & Budd, P.C.	ROYSTER, SHANNON (Associate)	\$625.00	\$600.00	5.5	\$3,437.50	\$3,300.00
Baron & Budd, P.C.	TAMBURELLI, ADAM (Associate)	\$795.00	\$600.00	15.1	\$12,004.50	\$9,060.00
Baron & Budd, P.C.	TELLIS, ROLAND (Partner)	\$1,200.00	\$895.00	13	\$15,600.00	\$11,635.00
Beasley Allen Crow Methvin Portis & Miles, PC	BARNETT, CLAY (Partner)	\$1,100.00	\$895.00	4.9	\$5,390.00	\$4,385.50
Beasley Allen Crow Methvin Portis & Miles, PC	MILES, DEE (Partner)	\$1,100.00	\$895.00	3.3	\$3,630.00	\$2,953.50
Beasley Allen Crow Methvin Portis & Miles, PC	RUSSELL, BRENDA (Paralegal)	\$275.00	\$275.00	5	\$1,375.00	\$1,375.00
Bleichmar Fonti & Auld LLP	DAVIS, ANNE (Partner)	\$995.00	\$895.00	0.9	\$895.50	\$805.50
Bleichmar Fonti & Auld LLP	KOO, JOOYOUNG (Staff Attorney)	\$575.00	\$415.00	8	\$4,600.00	\$3,320.00

Exhibit A - Summary of Hours and Lodestar Organized by Task Codes

Bleichmar Fonti & Auld LLP	ORNELAS, ANGELICA (Associate)	\$760.00	\$600.00	2.5	\$1,900.00	\$1,500.00
Bleichmar Fonti & Auld LLP	SAMRA, JOSHUA (Associate)	\$795.00	\$600.00	3.4	\$2,703.00	\$2,040.00
Bleichmar Fonti & Auld LLP	SULLIVAN, KASEY (Staff Attorney)	\$580.00	\$415.00	11.4	\$6,612.00	\$4,731.00
Bleichmar Fonti & Auld LLP	SUM, SYLVIA (Staff Attorney)	\$495.00	\$415.00	10	\$4,950.00	\$4,150.00
Bleichmar Fonti & Auld LLP	WEAVER, LESLEY (Partner)	\$1,310.00	\$895.00	1.1	\$1,441.00	\$984.50
Boies, Schiller & Flexner LLP	ULRICH, TYLER (Partner)	\$1,150.00	\$895.00	11.1	\$12,765.00	\$9,934.50
Boies, Schiller & Flexner LLP	WITTE, RYAN (Partner)	\$1,160.00	\$895.00	3.7	\$4,292.00	\$3,311.50
Boies, Schiller & Flexner LLP	ZACK, STEPHEN (Partner)	\$1,740.00	\$895.00	1.1	\$1,914.00	\$984.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	BARTLETT, CAROLINE (Partner)	\$875.00	\$875.00	55.7	\$48,737.50	\$48,737.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	CARABALLO, LUIS (Paralegal)	\$225.00	\$225.00	40.4	\$9,090.00	\$9,090.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	ECKLUND, DONALD (Partner)	\$900.00	\$895.00	1	\$900.00	\$895.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	FALDUTO, JEFF (Paralegal)	\$225.00	\$225.00	2.2	\$495.00	\$495.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	MAKHAIL, MARK (Associate)	\$600.00	\$600.00	1.1	\$660.00	\$660.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	STEELE, JORDAN (Associate)	\$600.00	\$600.00	15	\$9,000.00	\$9,000.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	TEMPTESTA, LAURA (Paralegal)	\$225.00	\$225.00	3.6	\$810.00	\$810.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	BARRON, SETH (Associate)	\$375.00	\$375.00	3.1	\$1,162.50	\$1,162.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	BLATT, GAYLE M. (Partner)	\$1,150.00	\$895.00	0.3	\$345.00	\$268.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	CASEY, DAVID S., JR. (Partner)	\$1,100.00	\$895.00	0.3	\$330.00	\$268.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	DAVE, SANJEEV (Staff Attorney)	\$450.00	\$415.00	7.7	\$3,465.00	\$3,195.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	DAVIS, JAMES (Associate)	\$475.00	\$475.00	1.6	\$760.00	\$760.00
Dicello Levitt & Casey LLC	TANGREN, JOHN (Partner)	\$1,210.00	\$895.00	0.2	\$242.00	\$179.00
Gibbs Law Group, LLP	BLUMENTHAL, AARON (Associate)	\$605.00	\$600.00	15.3	\$9,256.50	\$9,180.00
Gibbs Law Group, LLP	CORBITT, CAROLINE (Associate)	\$725.00	\$600.00	6.3	\$4,567.50	\$3,780.00
Gibbs Law Group, LLP	GIBBS, JASON (Paralegal)	\$280.00	\$275.00	31.7	\$8,876.00	\$8,717.50
Gibbs Law Group, LLP	HUGHES, DYLAN (Partner)	\$935.00	\$895.00	9.4	\$8,789.00	\$8,413.00
Gibbs Law Group, LLP	KOSBIE, JEFF (Associate)	\$605.00	\$600.00	0.4	\$242.00	\$240.00
Gibbs Law Group, LLP	LOPEZ, STEVE (Partner)	\$670.00	\$670.00	9.4	\$6,298.00	\$6,298.00
Gibbs Law Group, LLP	MAH, ROSANNE (Of Counsel)	\$740.00	\$740.00	7.7	\$5,698.00	\$5,698.00
Gibbs Law Group, LLP	RIVAS, ROSEMARY (Partner)	\$995.00	\$895.00	3.6	\$3,582.00	\$3,222.00
Gibbs Law Group, LLP	SOMINSKI, DASHA (Associate)	\$365.00	\$365.00	0.2	\$73.00	\$73.00
Gibbs Law Group, LLP	STEIN, DAVE (Partner)	\$815.00	\$815.00	0.2	\$163.00	\$163.00
Hellmuth & Johnson PLLC	BORLE, CORTLAND (Associate)	\$450.00	\$450.00	1.6	\$720.00	\$720.00
Hellmuth & Johnson PLLC	CAPRA, REBECCA (Paralegal)	\$165.00	\$165.00	0.4	\$66.00	\$66.00
Hellmuth & Johnson PLLC	CASHMAN, MICHAEL (Partner)	\$895.00	\$895.00	21.2	\$18,974.00	\$18,974.00
Hellmuth & Johnson PLLC	HAGSTROM, RICHARD (Partner)	\$980.00	\$895.00	37.4	\$36,652.00	\$33,473.00
Hellmuth & Johnson PLLC	KUHLMANN, NICHOLAS (Associate)	\$600.00	\$600.00	53.5	\$32,100.00	\$32,100.00
Hellmuth & Johnson PLLC	OTSUKA, GREGORY (Partner)	\$760.00	\$760.00	31.3	\$23,788.00	\$23,788.00
Hellmuth & Johnson PLLC	ZERBE, RODNEY (Partner)	\$610.00	\$610.00	0.3	\$183.00	\$183.00
Keller Rohrback L.L.P.	CAPPIO, GRETCHEN (Partner)	\$1,265.00	\$895.00	4.5	\$5,692.50	\$4,027.50
Keller Rohrback L.L.P.	GARDNER, KATHRYN (Paralegal)	\$315.00	\$275.00	2.8	\$882.00	\$770.00
Keller Rohrback L.L.P.	MCDEVITT, RYAN (Partner)	\$935.00	\$895.00	12.4	\$11,594.00	\$11,098.00
Keller Rohrback L.L.P.	MERSING, JACOB (Paralegal)	\$460.00	\$275.00	20	\$9,200.00	\$5,500.00
Keller Rohrback L.L.P.	MOROWITZ, RACHEL (Associate)	\$525.00	\$525.00	119.2	\$62,580.00	\$62,580.00
Keller Rohrback L.L.P.	SARKO, LYNN (Partner)	\$1,450.00	\$895.00	0.5	\$725.00	\$447.50
Keller Rohrback L.L.P.	WILKINSON, CARRIE (Paralegal)	\$395.00	\$275.00	0.5	\$197.50	\$137.50
Kessler Topaz Meltzer & Check, LLP	JEFFREY, CAROLYN (Staff Attorney)	\$300.00	\$300.00	21	\$6,300.00	\$6,300.00
Kessler Topaz Meltzer & Check, LLP	MELTZER, JOSEPH (Partner)	\$1,000.00	\$895.00	2.5	\$2,500.00	\$2,237.50
Kessler Topaz Meltzer & Check, LLP	MONKS, WILLIAM (Staff Attorney)	\$575.00	\$415.00	1.1	\$632.50	\$456.50
Kessler Topaz Meltzer & Check, LLP	RIGHTER, CAITLIN (Staff Attorney)	\$260.00	\$260.00	11.4	\$2,964.00	\$2,964.00
Kessler Topaz Meltzer & Check, LLP	TROUTNER, MELISSA (Partner)	\$950.00	\$895.00	4.2	\$3,990.00	\$3,759.00

Exhibit A - Summary of Hours and Lodestar Organized by Task Codes

Levi & Korsinsky, LLP	KORSINSKY, EDUARD (Partner)	\$1,050.00	\$895.00	0.2	\$210.00	\$179.00
Levi & Korsinsky, LLP	LEVI, JOSEPH (Partner)	\$1,050.00	\$895.00	4.2	\$4,410.00	\$3,759.00
Levi & Korsinsky, LLP	MACCARONE, COURTNEY (Associate)	\$675.00	\$600.00	4.5	\$3,037.50	\$2,700.00
Levi & Korsinsky, LLP	MAH, ROSANNE (Partner)	\$740.00	\$740.00	0.8	\$592.00	\$592.00
Levi & Korsinsky, LLP	RIVAS, ROSEMARY (Partner)	\$995.00	\$895.00	18.5	\$18,407.50	\$16,557.50
Lieff Cabraser Heimann & Bernstein, LLP	BALKOSKI, JANE (Paralegal)	\$360.00	\$275.00	3.6	\$1,296.00	\$990.00
Lieff Cabraser Heimann & Bernstein, LLP	BELUSHKO BARROWS, NIKKI (Paralegal)	\$535.00	\$275.00	11	\$5,885.00	\$3,025.00
Lieff Cabraser Heimann & Bernstein, LLP	BERTRAM, ANNE (Paralegal)	\$360.00	\$275.00	5.3	\$1,908.00	\$1,457.50
Lieff Cabraser Heimann & Bernstein, LLP	BROWN, AIDAN (Paralegal)	\$525.00	\$275.00	53.7	\$28,192.50	\$14,767.50
Lieff Cabraser Heimann & Bernstein, LLP	CABRASER, ELIZABETH (Partner)	\$1,740.00	\$895.00	3.3	\$5,742.00	\$2,953.50
Lieff Cabraser Heimann & Bernstein, LLP	CALANGIAN, MARGIE (Paralegal)	\$565.00	\$275.00	0.5	\$282.50	\$137.50
Lieff Cabraser Heimann & Bernstein, LLP	DESAI, NIMISH (Partner)	\$1,115.00	\$895.00	1.6	\$1,784.00	\$1,432.00
Lieff Cabraser Heimann & Bernstein, LLP	KENFIELD-KELLEHER, MURIEL (Associate)	\$655.00	\$600.00	5.3	\$3,471.50	\$3,180.00
Lieff Cabraser Heimann & Bernstein, LLP	LICHTMAN, JASON (Partner)	\$1,080.00	\$895.00	1.4	\$1,512.00	\$1,253.00
Lieff Cabraser Heimann & Bernstein, LLP	LIM, TRACY (Paralegal)	\$465.00	\$275.00	0.8	\$372.00	\$220.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Associate)	\$820.00	\$600.00	22	\$18,040.00	\$13,200.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Partner)	\$820.00	\$820.00	12.3	\$10,086.00	\$10,086.00
Lieff Cabraser Heimann & Bernstein, LLP	MICLUT, ANDREEA (Staff Attorney)	\$630.00	\$415.00	284.8	\$179,424.00	\$118,192.00
Lieff Cabraser Heimann & Bernstein, LLP	MILORO, SCOTT (Staff Attorney)	\$655.00	\$415.00	74.8	\$48,994.00	\$31,042.00
Lieff Cabraser Heimann & Bernstein, LLP	MUKHERJI, RENEE (Paralegal)	\$565.00	\$275.00	1.6	\$904.00	\$440.00
Lieff Cabraser Heimann & Bernstein, LLP	NGUYEN, PHONG-CHAU (Partner)	\$880.00	\$880.00	8.2	\$7,216.00	\$7,216.00
Lieff Cabraser Heimann & Bernstein, LLP	NICOLAOU, JOHN (Partner)	\$880.00	\$880.00	54.6	\$48,048.00	\$48,048.00
Lieff Cabraser Heimann & Bernstein, LLP	QUISPE, COYA (Paralegal)	\$515.00	\$275.00	5	\$2,575.00	\$1,375.00
Lieff Cabraser Heimann & Bernstein, LLP	RUDNICK, JENNIFER (Paralegal)	\$535.00	\$275.00	3.4	\$1,819.00	\$935.00
Lieff Cabraser Heimann & Bernstein, LLP	SELHORST, HANNAH (Paralegal)	\$395.00	\$275.00	2.3	\$908.50	\$632.50
Lieff Cabraser Heimann & Bernstein, LLP	SIDDIQI, NABILA (Paralegal)	\$535.00	\$275.00	2.3	\$1,230.50	\$632.50
Lieff Cabraser Heimann & Bernstein, LLP	STELLINGS, DAVID (Partner)	\$1,440.00	\$895.00	9.4	\$13,536.00	\$8,413.00
Lieff Cabraser Heimann & Bernstein, LLP	TARPEH, JLE (Paralegal)	\$540.00	\$275.00	205.7	\$111,078.00	\$56,567.50
Lieff Cabraser Heimann & Bernstein, LLP	TROUVAIS, BENJAMIN (Paralegal)	\$585.00	\$275.00	10	\$5,850.00	\$2,750.00
Lieff Cabraser Heimann & Bernstein, LLP	UY, KATRINA (Paralegal)	\$535.00	\$275.00	1.8	\$963.00	\$495.00
Lieff Cabraser Heimann & Bernstein, LLP	WILLIN, MITCHELL (Paralegal)	\$540.00	\$275.00	146.3	\$79,002.00	\$40,232.50
Podhurst Orseck, P.A.	FERNANDEZ ANDES, CHRIS (Paralegal)	\$345.00	\$275.00	4.2	\$1,449.00	\$1,155.00
Podhurst Orseck, P.A.	GRAVANTE, JOHN (Partner)	\$755.00	\$755.00	4.5	\$3,397.50	\$3,397.50
Podhurst Orseck, P.A.	PELL, STEPHANIE (Staff Attorney)	\$445.00	\$415.00	0.5	\$222.50	\$207.50
Podhurst Orseck, P.A.	PENELAS, CHRISTOPHER (Paralegal)	\$345.00	\$275.00	4.4	\$1,518.00	\$1,210.00
Podhurst Orseck, P.A.	YARZABAL, ILIANA (Paralegal)	\$345.00	\$275.00	5.8	\$2,001.00	\$1,595.00
Pritzker Levine LLP	CORBITT, CAROLINE (Associate)	\$725.00	\$600.00	0.7	\$507.50	\$420.00
Pritzker Levine LLP	HAGGARTY, HEATHER (Associate)	\$850.00	\$600.00	3	\$2,550.00	\$1,800.00
Pritzker Levine LLP	LEVINE, JONATHAN (Partner)	\$1,100.00	\$895.00	0.3	\$330.00	\$268.50
Pritzker Levine LLP	PRITZKER, ELIZABETH (Partner)	\$1,100.00	\$895.00	1	\$1,100.00	\$895.00
Robbins Geller Rudman and Dowd LLP	BRANDON, KELLEY (Paralegal)	\$325.00	\$275.00	11.5	\$3,737.50	\$3,162.50
Robbins Geller Rudman and Dowd LLP	DEARMAN, MARK (Partner)	\$1,100.00	\$895.00	3.8	\$4,180.00	\$3,401.00
Robbins Geller Rudman and Dowd LLP	MARENCO, RICARDO (Associate)	\$540.00	\$540.00	5.3	\$2,862.00	\$2,862.00
Robbins Geller Rudman and Dowd LLP	PUERTO, PATRICIA (Paralegal)	\$410.00	\$275.00	1.5	\$615.00	\$412.50
Robins Kaplan, LLP	ADLER, NICHOLAS J. (Paralegal)	\$435.00	\$275.00	1.5	\$652.50	\$412.50
Robins Kaplan, LLP	HURT, J. AUSTIN (Of Counsel)	\$1,050.00	\$895.00	48.4	\$50,820.00	\$43,318.00
Robins Kaplan, LLP	NADEM, KATHLEEN M. (Staff Attorney)	\$255.00	\$255.00	3.6	\$918.00	\$918.00
Robins Kaplan, LLP	PACELLI, MICHAEL J. (Associate)	\$795.00	\$600.00	0.7	\$556.50	\$420.00
Robins Kaplan, LLP	POTTER, ANN M. (Paralegal)	\$410.00	\$275.00	30.5	\$12,505.00	\$8,387.50
Robins Kaplan, LLP	SLAUGHTER, STACEY P. (Partner)	\$1,280.00	\$895.00	5.6	\$7,168.00	\$5,012.00

Exhibit A - Summary of Hours and Lodestar Organized by Task Codes

Robins Kaplan, LLP	SOTTORFF, FELIPE (Staff Attorney)	\$255.00	\$255.00	3	\$765.00	\$765.00
Seeger Weiss LLP	AYERS, CHRISTOPHER (Partner)	\$1,075.00	\$895.00	5.1	\$5,482.50	\$4,564.50
Seeger Weiss LLP	AZARIAN, NICOLE (Paralegal)	\$275.00	\$275.00	2.5	\$687.50	\$687.50
Seeger Weiss LLP	KRAMER, LESLIE (Paralegal)	\$295.00	\$275.00	15.1	\$4,454.50	\$4,152.50
Seeger Weiss LLP	SAFDAR, HUMAIRA (Associate)	\$525.00	\$525.00	0.7	\$367.50	\$367.50
Seeger Weiss LLP	TYJER, SABRINA (Paralegal)	\$395.00	\$275.00	3.4	\$1,343.00	\$935.00
Total Task Category 2				2163.2	\$1,381,586.50	\$1,084,097.50
<i>Task Category 3: Case Management and Litigation Strategy</i>						
Firm	Timekeeper	Standard Hourly Rate	Reduced Hourly Rate	Hours	Standard Hourly Lodestar	Reduced Hourly Lodestar
Ahdoot & Wolfson	AHDOOT, ROBERT (Partner)	\$1,300.00	\$895.00	3.6	\$4,680.00	\$3,222.00
Ahdoot & Wolfson	BENSON, SAMANTHA (Paralegal)	\$250.00	\$250.00	8.3	\$2,075.00	\$2,075.00
Ahdoot & Wolfson	BRASHEAR, AMBER (Paralegal)	\$250.00	\$250.00	0.3	\$75.00	\$75.00
Ahdoot & Wolfson	BUI, MICHELLE (Paralegal)	\$250.00	\$250.00	1.1	\$275.00	\$275.00
Ahdoot & Wolfson	CABRERA, KATHRYN (Paralegal)	\$350.00	\$275.00	0.5	\$175.00	\$137.50
Ahdoot & Wolfson	DEONNA, CHLOE (Associate)	\$550.00	\$550.00	22.9	\$12,595.00	\$12,595.00
Ahdoot & Wolfson	DILEGGI, DAWN (Paralegal)	\$350.00	\$275.00	4.7	\$1,645.00	\$1,292.50
Ahdoot & Wolfson	FABIAN, JESSIELLE (Paralegal)	\$250.00	\$250.00	3.9	\$975.00	\$975.00
Ahdoot & Wolfson	KELSTON, HENRY (Partner)	\$1,100.00	\$895.00	0.4	\$440.00	\$358.00
Ahdoot & Wolfson	KING, BRADLEY (Partner)	\$900.00	\$895.00	15.6	\$14,040.00	\$13,962.00
Ahdoot & Wolfson	LIIVAMAGI, HEIDI (Paralegal)	\$350.00	\$275.00	0.2	\$70.00	\$55.00
Ahdoot & Wolfson	LORITSCH, WINDY (Paralegal)	\$350.00	\$275.00	24.3	\$8,505.00	\$6,682.50
Ahdoot & Wolfson	LOWE, LAURA (Associate)	\$350.00	\$350.00	0.2	\$70.00	\$70.00
Ahdoot & Wolfson	LOWE, LAURA (Paralegal)	\$350.00	\$275.00	12.9	\$4,515.00	\$3,547.50
Ahdoot & Wolfson	MAYA, THEODORE (Partner)	\$1,100.00	\$895.00	1.1	\$1,210.00	\$984.50
Ahdoot & Wolfson	STINER, CHRISTOPHER (Partner)	\$975.00	\$895.00	37.4	\$36,465.00	\$33,473.00
Ahdoot & Wolfson	UNAL, SARPEN (Associate)	\$625.00	\$600.00	4.6	\$2,875.00	\$2,760.00
Ahdoot & Wolfson	WOLFSON, TINA (Partner)	\$1,300.00	\$895.00	29.8	\$38,740.00	\$26,671.00
Baron & Budd, P.C.	ALLEN, MOLLY GOZA (Staff Attorney)	\$415.00	\$415.00	594.1	\$246,551.50	\$246,551.50
Baron & Budd, P.C.	BENAVIDEZ, ERNEST (Paralegal)	\$250.00	\$250.00	211.1	\$52,775.00	\$52,775.00
Baron & Budd, P.C.	DARCHE, BENJAMIN (Staff Attorney)	\$415.00	\$415.00	8	\$3,320.00	\$3,320.00
Baron & Budd, P.C.	DOBBS, MICHAEL (Associate)	\$600.00	\$600.00	39.3	\$23,580.00	\$23,580.00
Baron & Budd, P.C.	ELLING, KELSEY (Associate)	\$600.00	\$600.00	0.6	\$360.00	\$360.00
Baron & Budd, P.C.	ENGLISH, LYNNZE (Staff Attorney)	\$415.00	\$415.00	7.1	\$2,946.50	\$2,946.50
Baron & Budd, P.C.	FERNANDES, DAVID B. (Associate)	\$795.00	\$600.00	999.3	\$794,443.50	\$599,580.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Partner)	\$795.00	\$795.00	50.9	\$40,465.50	\$40,465.50
Baron & Budd, P.C.	FRANKLIN-ROBINSON, LAKENYA (Staff Attorney)	\$415.00	\$415.00	8	\$3,320.00	\$3,320.00
Baron & Budd, P.C.	HANDT, JULIA (Staff Attorney)	\$415.00	\$415.00	4.8	\$1,992.00	\$1,992.00
Baron & Budd, P.C.	HEILMAN, JOE (Staff Attorney)	\$415.00	\$415.00	143.6	\$59,594.00	\$59,594.00
Baron & Budd, P.C.	IRISH, JASON (Staff Attorney)	\$415.00	\$415.00	11.4	\$4,731.00	\$4,731.00
Baron & Budd, P.C.	LEVINE, HARRISON M. (Staff Attorney)	\$415.00	\$415.00	1	\$415.00	\$415.00
Baron & Budd, P.C.	LICHTER, JAY MICHAEL (Associate)	\$795.00	\$600.00	65.3	\$51,913.50	\$39,180.00
Baron & Budd, P.C.	LIPINSKI, JEFFREY (Staff Attorney)	\$415.00	\$415.00	3.8	\$1,577.00	\$1,577.00
Baron & Budd, P.C.	MANN, JONAS (Associate)	\$600.00	\$600.00	89.3	\$53,580.00	\$53,580.00
Baron & Budd, P.C.	MILLER, ISAAC (Associate)	\$600.00	\$600.00	48	\$28,800.00	\$28,800.00
Baron & Budd, P.C.	MUTOMBO, MONIQUE (Staff Attorney)	\$415.00	\$415.00	21.2	\$8,798.00	\$8,798.00
Baron & Budd, P.C.	NEAL, RAVYN (Staff Attorney)	\$415.00	\$415.00	8	\$3,320.00	\$3,320.00
Baron & Budd, P.C.	NIEBERGALL, CATHERINE (Staff Attorney)	\$415.00	\$415.00	3.7	\$1,535.50	\$1,535.50
Baron & Budd, P.C.	OEFFNER, JESSICA (Staff Attorney)	\$415.00	\$415.00	117.3	\$48,679.50	\$48,679.50
Baron & Budd, P.C.	PACELLI, MICHAEL (Associate)	\$600.00	\$600.00	1.1	\$660.00	\$660.00
Baron & Budd, P.C.	PETTY, TAYLOR (Staff Attorney)	\$415.00	\$415.00	1	\$415.00	\$415.00

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Baron & Budd, P.C.	ROBELOT, RYAN A. (Staff Attorney)	\$415.00	\$415.00	33.3	\$13,819.50	\$13,819.50
Baron & Budd, P.C.	ROYSTER, SHANNON (Associate)	\$625.00	\$600.00	149.5	\$93,437.50	\$89,700.00
Baron & Budd, P.C.	SHAFFIN, ORI (Staff Attorney)	\$415.00	\$415.00	45.6	\$18,924.00	\$18,924.00
Baron & Budd, P.C.	SMILEY, ELIZABETH (Associate)	\$575.00	\$575.00	2.6	\$1,495.00	\$1,495.00
Baron & Budd, P.C.	TAMBURELLI, ADAM (Associate)	\$795.00	\$600.00	918.8	\$730,446.00	\$551,280.00
Baron & Budd, P.C.	TAMBURELLI, ADAM (Partner)	\$795.00	\$795.00	44.7	\$35,536.50	\$35,536.50
Baron & Budd, P.C.	TELLIS, ROLAND (Partner)	\$1,200.00	\$895.00	115.7	\$138,840.00	\$103,551.50
Beasley Allen Crow Methvin Portis & Miles, PC	BALDWIN, CHRIS (Staff Attorney)	\$350.00	\$350.00	0.7	\$245.00	\$245.00
Beasley Allen Crow Methvin Portis & Miles, PC	BARNETT, CLAY (Partner)	\$1,100.00	\$895.00	52.4	\$57,640.00	\$46,898.00
Beasley Allen Crow Methvin Portis & Miles, PC	MARTIN, DYLAN (Associate)	\$550.00	\$550.00	0.4	\$220.00	\$220.00
Beasley Allen Crow Methvin Portis & Miles, PC	MILES, DEE (Partner)	\$1,100.00	\$895.00	67.9	\$74,690.00	\$60,770.50
Beasley Allen Crow Methvin Portis & Miles, PC	RUSSELL, BRENDA (Paralegal)	\$275.00	\$275.00	144.7	\$39,792.50	\$39,792.50
Beasley Allen Crow Methvin Portis & Miles, PC	WILLIAMS, MITCH (Associate)	\$650.00	\$600.00	13.5	\$8,775.00	\$8,100.00
Bleichmar Fonti & Auld LLP	BERTERO, ANTHONY (Staff Attorney)	\$450.00	\$415.00	8	\$3,600.00	\$3,320.00
Bleichmar Fonti & Auld LLP	DAVIS, ANNE (Partner)	\$995.00	\$895.00	11.5	\$11,442.50	\$10,292.50
Bleichmar Fonti & Auld LLP	KOO, JOOYOUNG (Staff Attorney)	\$575.00	\$415.00	12.7	\$7,302.50	\$5,270.50
Bleichmar Fonti & Auld LLP	LAW, JULIE (Paralegal)	\$415.00	\$275.00	0.5	\$207.50	\$137.50
Bleichmar Fonti & Auld LLP	MULLENS, GREGORY (Of Counsel)	\$940.00	\$895.00	0.2	\$188.00	\$179.00
Bleichmar Fonti & Auld LLP	ORNELAS, ANGELICA (Associate)	\$760.00	\$600.00	10.2	\$7,752.00	\$6,120.00
Bleichmar Fonti & Auld LLP	ROBERTSON, KELSEY (Staff Attorney)	\$350.00	\$350.00	3.5	\$1,225.00	\$1,225.00
Bleichmar Fonti & Auld LLP	SAMRA, JOSHUA (Associate)	\$795.00	\$600.00	12	\$9,540.00	\$7,200.00
Bleichmar Fonti & Auld LLP	SIMNOWITZ, SARA (Associate)	\$940.00	\$600.00	2.6	\$2,444.00	\$1,560.00
Bleichmar Fonti & Auld LLP	SULLIVAN, KASEY (Staff Attorney)	\$580.00	\$415.00	4.9	\$2,842.00	\$2,033.50
Bleichmar Fonti & Auld LLP	SUM, SYLVIA (Staff Attorney)	\$495.00	\$415.00	16.5	\$8,167.50	\$6,847.50
Bleichmar Fonti & Auld LLP	WEAVER, LESLEY (Partner)	\$1,310.00	\$895.00	50.6	\$66,286.00	\$45,287.00
Boies, Schiller & Flexner LLP	BEATON, MARCOS (Of Counsel)	\$790.00	\$790.00	92.7	\$73,233.00	\$73,233.00
Boies, Schiller & Flexner LLP	BUTTERWORTH, BRANDON (Associate)	\$740.00	\$600.00	6.5	\$4,810.00	\$3,900.00
Boies, Schiller & Flexner LLP	LICATA, SAMANTHA (Associate)	\$670.00	\$600.00	4.4	\$2,948.00	\$2,640.00
Boies, Schiller & Flexner LLP	MARTIN, RACHEL (Associate)	\$710.00	\$600.00	21.8	\$15,478.00	\$13,080.00
Boies, Schiller & Flexner LLP	MIKULIC, MICHAEL (Associate)	\$740.00	\$600.00	6.8	\$5,032.00	\$4,080.00
Boies, Schiller & Flexner LLP	ULRICH, TYLER (Partner)	\$1,150.00	\$895.00	84.8	\$97,520.00	\$75,896.00
Boies, Schiller & Flexner LLP	WITTE, RYAN (Partner)	\$1,160.00	\$895.00	99.1	\$114,956.00	\$88,694.50
Boies, Schiller & Flexner LLP	ZACK, JASON (Of Counsel)	\$1,130.00	\$895.00	0.4	\$452.00	\$358.00
Boies, Schiller & Flexner LLP	ZACK, STEPHEN (Partner)	\$1,740.00	\$895.00	91.3	\$158,862.00	\$81,713.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	BARTLETT, CAROLINE (Partner)	\$875.00	\$875.00	15.4	\$13,475.00	\$13,475.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	BOWER, ZACH (Partner)	\$875.00	\$875.00	0.5	\$437.50	\$437.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	CARABALLO, LUIS (Paralegal)	\$225.00	\$225.00	70	\$15,750.00	\$15,750.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	CECCHI, JAMES (Partner)	\$1,000.00	\$895.00	3	\$3,000.00	\$2,685.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	ECKLUND, DONALD (Partner)	\$900.00	\$895.00	5.5	\$4,950.00	\$4,922.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	FALDUTO, JEFF (Paralegal)	\$225.00	\$225.00	2.1	\$472.50	\$472.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	INNES, MICHAEL (Partner)	\$750.00	\$750.00	0.6	\$450.00	\$450.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	MAKHAIL, MARK (Associate)	\$600.00	\$600.00	5.6	\$3,360.00	\$3,360.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	MANORY, WILLIAM (Associate)	\$550.00	\$550.00	5	\$2,750.00	\$2,750.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	MANORY, WILLIAM (Paralegal)	\$550.00	\$275.00	2.2	\$1,210.00	\$605.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	RAGO, MARY ELLEN (Paralegal)	\$225.00	\$225.00	0.9	\$202.50	\$202.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	STEELE, JORDAN (Associate)	\$600.00	\$600.00	33.8	\$20,280.00	\$20,280.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	TEMPTESTA, LAURA (Paralegal)	\$225.00	\$225.00	37.7	\$8,482.50	\$8,482.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	TYSON, STEVEN (Associate)	\$550.00	\$550.00	2.7	\$1,485.00	\$1,485.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	BARRON, SETH (Associate)	\$375.00	\$375.00	4.6	\$1,725.00	\$1,725.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	BLATT, GAYLE M. (Partner)	\$1,150.00	\$895.00	57.7	\$66,355.00	\$51,641.50

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Casey Gerry Schenk Francavilla Blatt & Penfield LLP	CASEY, DAVID S., JR. (Partner)	\$1,100.00	\$895.00	8.9	\$9,790.00	\$7,965.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	CASEY, III, DAVE (Associate)	\$395.00	\$395.00	3.3	\$1,303.50	\$1,303.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	DAVIS, JAMES (Associate)	\$475.00	\$475.00	53.3	\$25,317.50	\$25,317.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	GUERRA, P. CAMILLE (Partner)	\$935.00	\$895.00	115.3	\$107,805.50	\$103,193.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	MCBAIN, CATHERINE (Associate)	\$505.00	\$505.00	0.3	\$151.50	\$151.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	NARASIMHAN, AJIT (Paralegal)	\$215.00	\$215.00	2.5	\$537.50	\$537.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	RATAJESAK, VICKI (Paralegal)	\$235.00	\$235.00	0.2	\$47.00	\$47.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	ROBINSON, JEREMY (Partner)	\$950.00	\$895.00	19.8	\$18,810.00	\$17,721.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	SINNING, NANCY (Paralegal)	\$265.00	\$265.00	11.5	\$3,047.50	\$3,047.50
Dicello Levitt & Casey LLC	BANKS, SHARON (Paralegal)	\$415.00	\$275.00	10.7	\$4,440.50	\$2,942.50
Dicello Levitt & Casey LLC	FERRI, DANIEL (Partner)	\$1,110.00	\$895.00	12.4	\$13,764.00	\$11,098.00
Dicello Levitt & Casey LLC	LEVITT, ADAM (Partner)	\$1,430.00	\$895.00	82.3	\$117,689.00	\$73,658.50
Dicello Levitt & Casey LLC	OTTO, ASHTIN (Paralegal)	\$325.00	\$275.00	0.8	\$260.00	\$220.00
Dicello Levitt & Casey LLC	PROM, ADAM (Paralegal)	\$760.00	\$275.00	0.7	\$532.00	\$192.50
Dicello Levitt & Casey LLC	TANGREN, JOHN (Partner)	\$1,210.00	\$895.00	27.7	\$33,517.00	\$24,791.50
Gibbs Law Group, LLP	BLOOMFIELD, JOSHUA (Of Counsel)	\$900.00	\$895.00	47.7	\$42,930.00	\$42,691.50
Gibbs Law Group, LLP	CORBITT, CAROLINE (Associate)	\$725.00	\$600.00	1.2	\$870.00	\$720.00
Gibbs Law Group, LLP	GIBBONEY, KYLA (Associate)	\$605.00	\$600.00	0.1	\$60.50	\$60.00
Gibbs Law Group, LLP	GIBBS, ERIC (Partner)	\$1,065.00	\$895.00	0.8	\$852.00	\$716.00
Gibbs Law Group, LLP	HUTCHINSON, PARKER (Of Counsel)	\$660.00	\$660.00	1.4	\$924.00	\$924.00
Gibbs Law Group, LLP	KOSBIE, JEFF (Associate)	\$605.00	\$600.00	7.9	\$4,779.50	\$4,740.00
Gibbs Law Group, LLP	LOPEZ, STEVE (Partner)	\$670.00	\$670.00	3.2	\$2,144.00	\$2,144.00
Gibbs Law Group, LLP	MAH, ROSANNE (Of Counsel)	\$740.00	\$740.00	0.9	\$666.00	\$666.00
Gibbs Law Group, LLP	PROTHERO, ALYSSA (Staff Attorney)	\$415.00	\$415.00	39	\$16,185.00	\$16,185.00
Gibbs Law Group, LLP	RIVAS, ROSEMARY (Partner)	\$995.00	\$895.00	9.2	\$9,154.00	\$8,234.00
Gibbs Law Group, LLP	STEIN, DAVE (Partner)	\$815.00	\$815.00	1	\$815.00	\$815.00
Hellmuth & Johnson PLLC	CASHMAN, MICHAEL (Partner)	\$895.00	\$895.00	5.5	\$4,922.50	\$4,922.50
Hellmuth & Johnson PLLC	HAGSTROM, RICHARD (Partner)	\$980.00	\$895.00	41.5	\$40,670.00	\$37,142.50
Hellmuth & Johnson PLLC	KUHLMANN, NICHOLAS (Associate)	\$600.00	\$600.00	15.4	\$9,240.00	\$9,240.00
Hellmuth & Johnson PLLC	NELSON, BRIAN (Associate)	\$650.00	\$600.00	10.7	\$6,955.00	\$6,420.00
Hellmuth & Johnson PLLC	OTSUKA, GREGORY (Partner)	\$760.00	\$760.00	13.5	\$10,260.00	\$10,260.00
Keller Rohrback L.L.P.	BORSETH, XANNIE (Paralegal)	\$300.00	\$275.00	0.2	\$60.00	\$55.00
Keller Rohrback L.L.P.	CAPPIO, GRETCHEN (Partner)	\$1,265.00	\$895.00	79.2	\$100,188.00	\$70,884.00
Keller Rohrback L.L.P.	CHAN, ALEX (Paralegal)	\$400.00	\$275.00	48.2	\$19,280.00	\$13,255.00
Keller Rohrback L.L.P.	DANIEL, ADELE (Associate)	\$650.00	\$600.00	0.1	\$65.00	\$60.00
Keller Rohrback L.L.P.	EMERSON, ERIKA (Associate)	\$605.00	\$600.00	5.8	\$3,509.00	\$3,480.00
Keller Rohrback L.L.P.	FIERRO, ERIC (Partner)	\$910.00	\$895.00	1.5	\$1,365.00	\$1,342.50
Keller Rohrback L.L.P.	GARDNER, KATHRYN (Paralegal)	\$315.00	\$275.00	16.9	\$5,323.50	\$4,647.50
Keller Rohrback L.L.P.	GARRIDO, JOEL (Paralegal)	\$365.00	\$275.00	17.6	\$6,424.00	\$4,840.00
Keller Rohrback L.L.P.	GUSSIN, ZACHARY (Associate)	\$625.00	\$600.00	1.4	\$875.00	\$840.00
Keller Rohrback L.L.P.	GUTHRIE, HEATHER R. (Paralegal)	\$330.00	\$275.00	0.8	\$264.00	\$220.00
Keller Rohrback L.L.P.	HARRIS, ARDUA (Paralegal)	\$270.00	\$270.00	4	\$1,080.00	\$1,080.00
Keller Rohrback L.L.P.	HILL, JENNIFER (Paralegal)	\$425.00	\$275.00	2	\$850.00	\$550.00
Keller Rohrback L.L.P.	JANSEN, JESSICA S. (Paralegal)	\$410.00	\$275.00	0.1	\$41.00	\$27.50
Keller Rohrback L.L.P.	LAPORTE, KAIT (Paralegal)	\$280.00	\$275.00	7.6	\$2,128.00	\$2,090.00
Keller Rohrback L.L.P.	LIKIT, JAN (Paralegal)	\$260.00	\$260.00	0.4	\$104.00	\$104.00
Keller Rohrback L.L.P.	MARRIOTT, PATRICK T. (Associate)	\$545.00	\$545.00	5.4	\$2,943.00	\$2,943.00
Keller Rohrback L.L.P.	MCCENEY, ABIGAIL (Paralegal)	\$260.00	\$260.00	1	\$260.00	\$260.00
Keller Rohrback L.L.P.	MCDEVITT, RYAN (Partner)	\$935.00	\$895.00	309.9	\$289,756.50	\$277,360.50
Keller Rohrback L.L.P.	MERSING, JACOB (Paralegal)	\$460.00	\$275.00	208.3	\$95,818.00	\$57,282.50

Exhibit A - Summary of Hours and Lodestar Organized by Task Codes

Keller Rohrback L.L.P.	MEYER, WYATT (Paralegal)	\$90.00	\$90.00	12	\$1,080.00	\$1,080.00
Keller Rohrback L.L.P.	MOROWITZ, RACHEL (Associate)	\$525.00	\$525.00	59.9	\$31,447.50	\$31,447.50
Keller Rohrback L.L.P.	NEALIOUS, BIANCA (Paralegal)	\$335.00	\$275.00	41.2	\$13,802.00	\$11,330.00
Keller Rohrback L.L.P.	NICHOLS, RAENY M. (Paralegal)	\$330.00	\$275.00	0.1	\$33.00	\$27.50
Keller Rohrback L.L.P.	PREUSCH, MATTHEW J. (Associate)	\$750.00	\$600.00	0.2	\$150.00	\$120.00
Keller Rohrback L.L.P.	PRY, JONATHAN (Paralegal)	\$260.00	\$260.00	1.7	\$442.00	\$442.00
Keller Rohrback L.L.P.	READ, SYDNEY (Associate)	\$510.00	\$510.00	70.5	\$35,955.00	\$35,955.00
Keller Rohrback L.L.P.	RODGERS, AUBREY (Paralegal)	\$385.00	\$275.00	15	\$5,775.00	\$4,125.00
Keller Rohrback L.L.P.	SARKO, LYNN (Partner)	\$1,450.00	\$895.00	8.1	\$11,745.00	\$7,249.50
Keller Rohrback L.L.P.	SMITH, ALEX (Paralegal)	\$395.00	\$275.00	2.9	\$1,145.50	\$797.50
Keller Rohrback L.L.P.	SPANGLER, BRIAN E. (Paralegal)	\$365.00	\$275.00	37.9	\$13,833.50	\$10,422.50
Keller Rohrback L.L.P.	STRECKERT, PATRICK M. T.M. (Associate)	\$510.00	\$510.00	6	\$3,060.00	\$3,060.00
Keller Rohrback L.L.P.	TIEZAZU, Y. TIZZY (Paralegal)	\$305.00	\$275.00	1.1	\$335.50	\$302.50
Keller Rohrback L.L.P.	TUNKKARI, KATJA (Paralegal)	\$300.00	\$275.00	21.6	\$6,480.00	\$5,940.00
Keller Rohrback L.L.P.	VERDUGO, GABE E. (Associate)	\$630.00	\$600.00	13.1	\$8,253.00	\$7,860.00
Keller Rohrback L.L.P.	WILSON, KIANA (Paralegal)	\$365.00	\$275.00	7.3	\$2,664.50	\$2,007.50
Keller Rohrback L.L.P.	WRIGHT, EMMA (Paralegal)	\$595.00	\$275.00	11.5	\$6,842.50	\$3,162.50
Kessler Topaz Meltzer & Check, LLP	AMJED, NAUMON (Partner)	\$970.00	\$895.00	2.1	\$2,037.00	\$1,879.50
Kessler Topaz Meltzer & Check, LLP	BELL, ADRIENNE (Associate)	\$575.00	\$575.00	189.9	\$109,192.50	\$109,192.50
Kessler Topaz Meltzer & Check, LLP	GRADEN, TYLER (Associate)	\$965.00	\$600.00	6	\$5,790.00	\$3,600.00
Kessler Topaz Meltzer & Check, LLP	HEMSLEY, COURTNEY (Paralegal)	\$405.00	\$275.00	32.8	\$13,284.00	\$9,020.00
Kessler Topaz Meltzer & Check, LLP	JULIANO, MAGGIE (Staff Attorney)	\$385.00	\$385.00	0.2	\$77.00	\$77.00
Kessler Topaz Meltzer & Check, LLP	LESSER, NATALIE (Associate)	\$535.00	\$535.00	13.8	\$7,383.00	\$7,383.00
Kessler Topaz Meltzer & Check, LLP	MARO, JAMES (Partner)	\$950.00	\$895.00	2	\$1,900.00	\$1,790.00
Kessler Topaz Meltzer & Check, LLP	MCGINLEY, LAUREN (Associate)	\$480.00	\$480.00	4.8	\$2,304.00	\$2,304.00
Kessler Topaz Meltzer & Check, LLP	MELTZER, JOSEPH (Partner)	\$1,000.00	\$895.00	28.9	\$28,900.00	\$25,865.50
Kessler Topaz Meltzer & Check, LLP	MONKS, WILLIAM (Staff Attorney)	\$575.00	\$415.00	1.6	\$920.00	\$664.00
Kessler Topaz Meltzer & Check, LLP	PAFFAS, HOLLY (Paralegal)	\$320.00	\$275.00	0.4	\$128.00	\$110.00
Kessler Topaz Meltzer & Check, LLP	PARK, ALEX (Associate)	\$480.00	\$480.00	0.5	\$240.00	\$240.00
Kessler Topaz Meltzer & Check, LLP	PEOPLES, ANDREW (Staff Attorney)	\$455.00	\$415.00	3.6	\$1,638.00	\$1,494.00
Kessler Topaz Meltzer & Check, LLP	PORT, LISA LAMB (Associate)	\$750.00	\$600.00	8	\$6,000.00	\$4,800.00
Kessler Topaz Meltzer & Check, LLP	PORT, LISA LAMB (Of Counsel)	\$750.00	\$750.00	2.5	\$1,875.00	\$1,875.00
Kessler Topaz Meltzer & Check, LLP	SHERONAS, KELSEY (Associate)	\$510.00	\$510.00	2	\$1,020.00	\$1,020.00
Kessler Topaz Meltzer & Check, LLP	SWIFT, MARY (Paralegal)	\$320.00	\$275.00	4.3	\$1,376.00	\$1,182.50
Kessler Topaz Meltzer & Check, LLP	TAMERIER, JULIE (Paralegal)	\$85.00	\$85.00	0.5	\$42.50	\$42.50
Kessler Topaz Meltzer & Check, LLP	TOPAZ, MARC (Partner)	\$1,000.00	\$895.00	2.5	\$2,500.00	\$2,237.50
Kessler Topaz Meltzer & Check, LLP	TROUTNER, MELISSA (Partner)	\$950.00	\$895.00	25.4	\$24,130.00	\$22,733.00
Kessler Topaz Meltzer & Check, LLP	WHITMAN, JOHNSTON (Partner)	\$950.00	\$895.00	5.2	\$4,940.00	\$4,654.00
Kessler Topaz Meltzer & Check, LLP	WINCHESTER, ROBIN (Partner)	\$1,145.00	\$895.00	5.1	\$5,839.50	\$4,564.50
Kessler Topaz Meltzer & Check, LLP	YEATES, MELISSA (Partner)	\$1,145.00	\$895.00	1.5	\$1,717.50	\$1,342.50
Law Offices of Richard M. Hagstrom	HAGSTROM, RICHARD (Partner)	\$980.00	\$895.00	2.3	\$2,254.00	\$2,058.50
Levi & Korsinsky, LLP	KORSINSKY, EDUARD (Partner)	\$1,050.00	\$895.00	0.4	\$420.00	\$358.00
Levi & Korsinsky, LLP	LEVI, JOSEPH (Partner)	\$1,050.00	\$895.00	0.2	\$210.00	\$179.00
Levi & Korsinsky, LLP	MACCARONE, COURTNEY (Associate)	\$675.00	\$600.00	85.6	\$57,780.00	\$51,360.00
Levi & Korsinsky, LLP	MAH, ROSANNE (Partner)	\$740.00	\$740.00	42.2	\$31,228.00	\$31,228.00
Levi & Korsinsky, LLP	RIVAS, ROSEMARY (Partner)	\$995.00	\$895.00	19.8	\$19,701.00	\$17,721.00
Levi & Korsinsky, LLP	SCHMITT, CHRISTOPHER (Staff Attorney)	\$475.00	\$415.00	23.7	\$11,257.50	\$9,835.50
Lieff Cabraser Heimann & Bernstein, LLP	ANTHONY, RICHARD (Paralegal)	\$535.00	\$275.00	0.5	\$267.50	\$137.50
Lieff Cabraser Heimann & Bernstein, LLP	ARSOV, DUSHAN (Paralegal)	\$515.00	\$275.00	139.1	\$71,636.50	\$38,252.50
Lieff Cabraser Heimann & Bernstein, LLP	BALKOSKI, JANE (Paralegal)	\$360.00	\$275.00	30.2	\$10,872.00	\$8,305.00

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Lieff Cabraser Heimann & Bernstein, LLP	BAYRON, ERICA (Paralegal)	\$510.00	\$275.00	61	\$31,110.00	\$16,775.00
Lieff Cabraser Heimann & Bernstein, LLP	BEHRMANN, DAWN (Paralegal)	\$405.00	\$275.00	3.5	\$1,417.50	\$962.50
Lieff Cabraser Heimann & Bernstein, LLP	BELUSHKO BARROWS, NIKKI (Paralegal)	\$535.00	\$275.00	1.7	\$909.50	\$467.50
Lieff Cabraser Heimann & Bernstein, LLP	BERTRAM, ANNE (Paralegal)	\$360.00	\$275.00	40.8	\$14,688.00	\$11,220.00
Lieff Cabraser Heimann & Bernstein, LLP	BILKISS, ABBY (Staff Attorney)	\$655.00	\$415.00	11	\$7,205.00	\$4,565.00
Lieff Cabraser Heimann & Bernstein, LLP	BROWN, AIDAN (Paralegal)	\$525.00	\$275.00	351.8	\$184,695.00	\$96,745.00
Lieff Cabraser Heimann & Bernstein, LLP	BUDNER, KEVIN (Partner)	\$880.00	\$880.00	0.8	\$704.00	\$704.00
Lieff Cabraser Heimann & Bernstein, LLP	CABRASER, ELIZABETH (Partner)	\$1,740.00	\$895.00	0.9	\$1,566.00	\$805.50
Lieff Cabraser Heimann & Bernstein, LLP	CALANGIAN, MARGIE (Paralegal)	\$565.00	\$275.00	44.6	\$25,199.00	\$12,265.00
Lieff Cabraser Heimann & Bernstein, LLP	CHINN, VICTORIA (Staff Attorney)	\$655.00	\$415.00	0.5	\$327.50	\$207.50
Lieff Cabraser Heimann & Bernstein, LLP	CHIPLOCK, DANIEL (Partner)	\$1,260.00	\$895.00	2.2	\$2,772.00	\$1,969.00
Lieff Cabraser Heimann & Bernstein, LLP	DESAI, NIMISH (Partner)	\$1,115.00	\$895.00	38.1	\$42,481.50	\$34,099.50
Lieff Cabraser Heimann & Bernstein, LLP	GEISSLER, ROGER (Staff Attorney)	\$630.00	\$415.00	1	\$630.00	\$415.00
Lieff Cabraser Heimann & Bernstein, LLP	GRANT, ANTHONY (Paralegal)	\$565.00	\$275.00	1.4	\$791.00	\$385.00
Lieff Cabraser Heimann & Bernstein, LLP	GRIFFITH, SPENCER (Paralegal)	\$405.00	\$275.00	5.5	\$2,227.50	\$1,512.50
Lieff Cabraser Heimann & Bernstein, LLP	JONES, KAREN (Staff Attorney)	\$655.00	\$415.00	3	\$1,965.00	\$1,245.00
Lieff Cabraser Heimann & Bernstein, LLP	JORDAN, CHRISTOPHER (Staff Attorney)	\$630.00	\$415.00	14.1	\$8,883.00	\$5,851.50
Lieff Cabraser Heimann & Bernstein, LLP	KAWAMURA, JENNIFER (Paralegal)	\$540.00	\$275.00	0.4	\$216.00	\$110.00
Lieff Cabraser Heimann & Bernstein, LLP	KENFIELD-KELLEHER, MURIEL (Associate)	\$655.00	\$600.00	65.1	\$42,640.50	\$39,060.00
Lieff Cabraser Heimann & Bernstein, LLP	KRAVATZ, JILLIAN (Paralegal)	\$415.00	\$275.00	12.4	\$5,146.00	\$3,410.00
Lieff Cabraser Heimann & Bernstein, LLP	KRUGER, ERIK (Paralegal)	\$540.00	\$275.00	26.2	\$14,148.00	\$7,205.00
Lieff Cabraser Heimann & Bernstein, LLP	LICHTMAN, JASON (Partner)	\$1,080.00	\$895.00	5.6	\$6,048.00	\$5,012.00
Lieff Cabraser Heimann & Bernstein, LLP	LIM, TRACY (Paralegal)	\$465.00	\$275.00	14.5	\$6,742.50	\$3,987.50
Lieff Cabraser Heimann & Bernstein, LLP	MACATEE, MARK (Paralegal)	\$540.00	\$275.00	0.3	\$162.00	\$82.50
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Associate)	\$820.00	\$600.00	176.4	\$144,648.00	\$105,840.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Partner)	\$820.00	\$820.00	152.2	\$124,804.00	\$124,804.00
Lieff Cabraser Heimann & Bernstein, LLP	MICLUT, ANDREEA (Staff Attorney)	\$630.00	\$415.00	3.4	\$2,142.00	\$1,411.00
Lieff Cabraser Heimann & Bernstein, LLP	MILORO, SCOTT (Staff Attorney)	\$655.00	\$415.00	146.5	\$95,957.50	\$60,797.50
Lieff Cabraser Heimann & Bernstein, LLP	NEE, MAYA (Paralegal)	\$455.00	\$275.00	48.9	\$22,249.50	\$13,447.50
Lieff Cabraser Heimann & Bernstein, LLP	NGUYEN, PHONG-CHAU (Partner)	\$880.00	\$880.00	223.2	\$196,416.00	\$196,416.00
Lieff Cabraser Heimann & Bernstein, LLP	NICOLAOU, JOHN (Partner)	\$880.00	\$880.00	502	\$441,760.00	\$441,760.00
Lieff Cabraser Heimann & Bernstein, LLP	PUSTILNIK, ALIX (Staff Attorney)	\$415.00	\$415.00	8.9	\$3,693.50	\$3,693.50
Lieff Cabraser Heimann & Bernstein, LLP	RAHIMI, FAWAD (Paralegal)	\$565.00	\$275.00	36.9	\$20,848.50	\$10,147.50
Lieff Cabraser Heimann & Bernstein, LLP	RUDNICK, JENNIFER (Paralegal)	\$535.00	\$275.00	2.5	\$1,337.50	\$687.50
Lieff Cabraser Heimann & Bernstein, LLP	SELHORST, HANNAH (Paralegal)	\$395.00	\$275.00	19	\$7,505.00	\$5,225.00
Lieff Cabraser Heimann & Bernstein, LLP	STELLINGS, DAVID (Partner)	\$1,440.00	\$895.00	1102	\$1,586,880.00	\$986,290.00
Lieff Cabraser Heimann & Bernstein, LLP	TARPEH, JLE (Paralegal)	\$540.00	\$275.00	281.6	\$152,064.00	\$77,440.00
Lieff Cabraser Heimann & Bernstein, LLP	TEXIER, MUNA (Paralegal)	\$565.00	\$275.00	7.3	\$4,124.50	\$2,007.50
Lieff Cabraser Heimann & Bernstein, LLP	WILLIN, MITCHELL (Paralegal)	\$540.00	\$275.00	2	\$1,080.00	\$550.00
Podhurst Orseck, P.A.	DEL RIEGO, ALISSA (Associate)	\$655.00	\$600.00	82.2	\$53,841.00	\$49,320.00
Podhurst Orseck, P.A.	GRAVANTE, JOHN (Partner)	\$755.00	\$755.00	52.7	\$39,788.50	\$39,788.50
Podhurst Orseck, P.A.	LEVY, NATHALIE (Staff Attorney)	\$590.00	\$415.00	20.1	\$11,859.00	\$8,341.50
Podhurst Orseck, P.A.	LOPEZ, ALEJANDRO (Staff Attorney)	\$590.00	\$415.00	0.5	\$295.00	\$207.50
Podhurst Orseck, P.A.	PELL, STEPHANIE (Contract Attorney)	\$445.00	\$445.00	33.6	\$14,952.00	\$14,952.00
Podhurst Orseck, P.A.	PELL, STEPHANIE (Staff Attorney)	\$445.00	\$415.00	17.5	\$7,787.50	\$7,262.50
Podhurst Orseck, P.A.	PRIETO, PETER (Partner)	\$1,275.00	\$895.00	16.8	\$21,420.00	\$15,036.00
Podhurst Orseck, P.A.	WEINSHALL, MATT (Partner)	\$755.00	\$755.00	8.2	\$6,191.00	\$6,191.00
Podhurst Orseck, P.A.	YARZABAL, ILIANA (Paralegal)	\$345.00	\$275.00	168.8	\$58,236.00	\$46,420.00
Pritzker Levine LLP	CARACUZZO, BETHANY (Partner)	\$950.00	\$895.00	8.6	\$8,170.00	\$7,697.00
Pritzker Levine LLP	CORBITT, CAROLINE (Associate)	\$725.00	\$600.00	12.7	\$9,207.50	\$7,620.00

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Pritzker Levine LLP	DOWALIBY, JOANNA (Paralegal)	\$295.00	\$275.00	2	\$590.00	\$550.00
Pritzker Levine LLP	HAGGARTY, HEATHER (Associate)	\$850.00	\$600.00	39.6	\$33,660.00	\$23,760.00
Pritzker Levine LLP	LEVINE, JONATHAN (Partner)	\$1,100.00	\$895.00	131.3	\$144,430.00	\$117,513.50
Pritzker Levine LLP	PRITZKER, ELIZABETH (Partner)	\$1,100.00	\$895.00	9.1	\$10,010.00	\$8,144.50
Pritzker Levine LLP	WHITNEY, ANNE (Associate)	\$700.00	\$600.00	11.6	\$8,120.00	\$6,960.00
Robbins Geller Rudman and Dowd LLP	ALPERSTEIN, JASON (Partner)	\$840.00	\$840.00	0.3	\$252.00	\$252.00
Robbins Geller Rudman and Dowd LLP	COHEN, ALEXANDER (Associate)	\$560.00	\$560.00	6.9	\$3,864.00	\$3,864.00
Robbins Geller Rudman and Dowd LLP	CURTISS, BROOKE (Staff Attorney)	\$440.00	\$415.00	6.1	\$2,684.00	\$2,531.50
Robbins Geller Rudman and Dowd LLP	DAVIS, ALINA (Associate)	\$675.00	\$600.00	0.6	\$405.00	\$360.00
Robbins Geller Rudman and Dowd LLP	DEARMAN, MARK (Partner)	\$1,100.00	\$895.00	28.2	\$31,020.00	\$25,239.00
Robbins Geller Rudman and Dowd LLP	GELLER, PAUL (Partner)	\$1,375.00	\$895.00	3.5	\$4,812.50	\$3,132.50
Robbins Geller Rudman and Dowd LLP	HANSON, KATINA (Paralegal)	\$410.00	\$275.00	62.8	\$25,748.00	\$17,270.00
Robbins Geller Rudman and Dowd LLP	JENSEN, RACHEL (Partner)	\$985.00	\$895.00	8.3	\$8,175.50	\$7,428.50
Robbins Geller Rudman and Dowd LLP	MARENCO, RICARDO (Associate)	\$540.00	\$540.00	27.9	\$15,066.00	\$15,066.00
Robbins Geller Rudman and Dowd LLP	PUERTO, PATRICIA (Paralegal)	\$410.00	\$275.00	9.1	\$3,731.00	\$2,502.50
Robbins Geller Rudman and Dowd LLP	SAWYER, MAXWELL (Associate)	\$475.00	\$475.00	0.2	\$95.00	\$95.00
Robbins Geller Rudman and Dowd LLP	SCIALPI, FACUNDO (Associate)	\$465.00	\$465.00	0.5	\$232.50	\$232.50
Robbins Geller Rudman and Dowd LLP	TACK, DEBORAH (Paralegal)	\$410.00	\$275.00	9.4	\$3,854.00	\$2,585.00
Robbins Geller Rudman and Dowd LLP	TAYLOR, LINDSEY (Partner)	\$1,200.00	\$895.00	1.3	\$1,560.00	\$1,163.50
Robins Kaplan, LLP	BERNHAGEN, NICOLE R. (Paralegal)	\$410.00	\$275.00	9.3	\$3,813.00	\$2,557.50
Robins Kaplan, LLP	HURT, J. AUSTIN (Of Counsel)	\$1,050.00	\$895.00	226.8	\$238,140.00	\$202,986.00
Robins Kaplan, LLP	HURT, J. AUSTIN (Partner)	\$1,050.00	\$895.00	23.5	\$24,675.00	\$21,032.50
Robins Kaplan, LLP	PACELLI, MICHAEL J. (Associate)	\$795.00	\$600.00	73.1	\$58,114.50	\$43,860.00
Robins Kaplan, LLP	POTTER, ANN M. (Paralegal)	\$410.00	\$275.00	13.4	\$5,494.00	\$3,685.00
Robins Kaplan, LLP	SLAUGHTER, STACEY P. (Partner)	\$1,280.00	\$895.00	123.4	\$157,952.00	\$110,443.00
Seeger Weiss LLP	ARTEAGA, ALEXANDRA (Paralegal)	\$395.00	\$275.00	3.6	\$1,422.00	\$990.00
Seeger Weiss LLP	AYERS, CHRISTOPHER (Partner)	\$1,075.00	\$895.00	29.5	\$31,712.50	\$26,402.50
Seeger Weiss LLP	KRAMER, LESLIE (Paralegal)	\$295.00	\$275.00	19.5	\$5,752.50	\$5,362.50
Seeger Weiss LLP	SCULLION, JENNIFER (Partner)	\$850.00	\$850.00	3.8	\$3,230.00	\$3,230.00
Seeger Weiss LLP	SEEGER, CHRISTOPHER (Partner)	\$985.00	\$895.00	1.5	\$1,477.50	\$1,342.50
Total Task Category 3				11971.6	\$9,376,434.50	\$7,362,690.50
<i>Task Category 4: Discovery</i>						
Firm	Timekeeper	Standard Hourly Rate	Reduced Hourly Rate	Hours	Standard Hourly Lodestar	Reduced Hourly Lodestar
Ahdoot & Wolfson	BENSON, SAMANTHA (Paralegal)	\$250.00	\$250.00	0.4	\$100.00	\$100.00
Ahdoot & Wolfson	BUI, MICHELLE (Paralegal)	\$250.00	\$250.00	0.7	\$175.00	\$175.00
Ahdoot & Wolfson	DEONNA, CHLOE (Associate)	\$550.00	\$550.00	11	\$6,050.00	\$6,050.00
Ahdoot & Wolfson	KING, BRADLEY (Partner)	\$900.00	\$895.00	0.4	\$360.00	\$358.00
Ahdoot & Wolfson	LORITSCH, WINDY (Paralegal)	\$350.00	\$275.00	0.6	\$210.00	\$165.00
Ahdoot & Wolfson	LOWE, LAURA (Paralegal)	\$350.00	\$275.00	1.2	\$420.00	\$330.00
Ahdoot & Wolfson	MAYA, THEODORE (Partner)	\$1,100.00	\$895.00	0.9	\$990.00	\$805.50
Ahdoot & Wolfson	STINER, CHRISTOPHER (Partner)	\$975.00	\$895.00	49.7	\$48,457.50	\$44,481.50
Ahdoot & Wolfson	UNAL, SARPEN (Associate)	\$625.00	\$600.00	16.9	\$10,562.50	\$10,140.00
Ahdoot & Wolfson	WOLFSON, TINA (Partner)	\$1,300.00	\$895.00	13.4	\$17,420.00	\$11,993.00
Baron & Budd, P.C.	ALLEN, MOLLY GOZA (Staff Attorney)	\$415.00	\$415.00	397.3	\$164,879.50	\$164,879.50
Baron & Budd, P.C.	DOBBS, MICHAEL (Associate)	\$600.00	\$600.00	117.2	\$70,320.00	\$70,320.00
Baron & Budd, P.C.	ELLING, KELSEY (Associate)	\$600.00	\$600.00	1.1	\$660.00	\$660.00
Baron & Budd, P.C.	ENGLISH, LYNNZE (Staff Attorney)	\$415.00	\$415.00	1311.4	\$544,231.00	\$544,231.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Associate)	\$795.00	\$600.00	836.4	\$664,938.00	\$501,840.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Partner)	\$795.00	\$795.00	111	\$88,245.00	\$88,245.00
Baron & Budd, P.C.	FRANKLIN-ROBINSON, LAKENYA (Staff Attorney)	\$415.00	\$415.00	52.5	\$21,787.50	\$21,787.50

Exhibit A - Summary of Hours and Lodestar Organized by Task Codes

Baron & Budd, P.C.	HANDT, JULIA (Staff Attorney)	\$415.00	\$415.00	239.2	\$99,268.00	\$99,268.00
Baron & Budd, P.C.	HEILMAN, JOE (Staff Attorney)	\$415.00	\$415.00	11.8	\$4,897.00	\$4,897.00
Baron & Budd, P.C.	KENT, JOSEPH (Staff Attorney)	\$415.00	\$415.00	16	\$6,640.00	\$6,640.00
Baron & Budd, P.C.	LEVINE, HARRISON M. (Staff Attorney)	\$415.00	\$415.00	1	\$415.00	\$415.00
Baron & Budd, P.C.	LICHTER, JAY MICHAEL (Associate)	\$795.00	\$600.00	29.4	\$23,373.00	\$17,640.00
Baron & Budd, P.C.	LIPINSKI, JEFFREY (Staff Attorney)	\$415.00	\$415.00	2.8	\$1,162.00	\$1,162.00
Baron & Budd, P.C.	MANN, JONAS (Associate)	\$600.00	\$600.00	88.4	\$53,040.00	\$53,040.00
Baron & Budd, P.C.	MILLER, ISAAC (Associate)	\$600.00	\$600.00	167.7	\$100,620.00	\$100,620.00
Baron & Budd, P.C.	MUTOMBO, MONIQUE (Staff Attorney)	\$415.00	\$415.00	642.1	\$266,471.50	\$266,471.50
Baron & Budd, P.C.	OEFFNER, JESSICA (Staff Attorney)	\$415.00	\$415.00	104.1	\$43,201.50	\$43,201.50
Baron & Budd, P.C.	PACELLI, MICHAEL (Associate)	\$600.00	\$600.00	34.7	\$20,820.00	\$20,820.00
Baron & Budd, P.C.	PETTY, TAYLOR (Staff Attorney)	\$415.00	\$415.00	1	\$415.00	\$415.00
Baron & Budd, P.C.	ROBELOT, RYAN A. (Staff Attorney)	\$415.00	\$415.00	80.2	\$33,283.00	\$33,283.00
Baron & Budd, P.C.	ROYSTER, SHANNON (Associate)	\$625.00	\$600.00	956.8	\$598,000.00	\$574,080.00
Baron & Budd, P.C.	SHAFFIN, ORI (Staff Attorney)	\$415.00	\$415.00	155	\$64,325.00	\$64,325.00
Baron & Budd, P.C.	SMILEY, ELIZABETH (Associate)	\$575.00	\$575.00	15	\$8,625.00	\$8,625.00
Baron & Budd, P.C.	TAMBURELLI, ADAM (Associate)	\$795.00	\$600.00	1053.7	\$837,691.50	\$632,220.00
Baron & Budd, P.C.	TAMBURELLI, ADAM (Partner)	\$795.00	\$795.00	132.9	\$105,655.50	\$105,655.50
Baron & Budd, P.C.	TELLIS, ROLAND (Partner)	\$1,200.00	\$895.00	164.5	\$197,400.00	\$147,227.50
Beasley Allen Crow Methvin Portis & Miles, PC	BARNETT, CLAY (Partner)	\$1,100.00	\$895.00	19	\$20,900.00	\$17,005.00
Beasley Allen Crow Methvin Portis & Miles, PC	MANN, TRENT (Associate)	\$550.00	\$550.00	10.4	\$5,720.00	\$5,720.00
Beasley Allen Crow Methvin Portis & Miles, PC	MANN, TRENT (Paralegal)	\$550.00	\$275.00	2.4	\$1,320.00	\$660.00
Beasley Allen Crow Methvin Portis & Miles, PC	MARTIN, DYLAN (Associate)	\$550.00	\$550.00	30.9	\$16,995.00	\$16,995.00
Beasley Allen Crow Methvin Portis & Miles, PC	MILES, DEE (Partner)	\$1,100.00	\$895.00	5.8	\$6,380.00	\$5,191.00
Beasley Allen Crow Methvin Portis & Miles, PC	RUSSELL, BRENDA (Paralegal)	\$275.00	\$275.00	15.7	\$4,317.50	\$4,317.50
Beasley Allen Crow Methvin Portis & Miles, PC	WILLIAMS, MITCH (Associate)	\$650.00	\$600.00	18.9	\$12,285.00	\$11,340.00
Bleichmar Fonti & Auld LLP	DAVIS, ANNE (Partner)	\$995.00	\$895.00	13.5	\$13,432.50	\$12,082.50
Bleichmar Fonti & Auld LLP	KOO, JOOYOUNG (Staff Attorney)	\$575.00	\$415.00	734	\$422,050.00	\$304,610.00
Bleichmar Fonti & Auld LLP	LAW, JULIE (Paralegal)	\$415.00	\$275.00	0.7	\$290.50	\$192.50
Bleichmar Fonti & Auld LLP	MULLEN, GREGORY (Of Counsel)	\$940.00	\$895.00	0.7	\$658.00	\$626.50
Bleichmar Fonti & Auld LLP	ORNELAS, ANGELICA (Associate)	\$760.00	\$600.00	10.5	\$7,980.00	\$6,300.00
Bleichmar Fonti & Auld LLP	SAMRA, JOSHUA (Associate)	\$795.00	\$600.00	0.5	\$397.50	\$300.00
Bleichmar Fonti & Auld LLP	SULLIVAN, KASEY (Staff Attorney)	\$580.00	\$415.00	1.3	\$754.00	\$539.50
Bleichmar Fonti & Auld LLP	SUM, SYLVIA (Staff Attorney)	\$495.00	\$415.00	1739.7	\$861,151.50	\$721,975.50
Bleichmar Fonti & Auld LLP	TSURUDOME, GLEN (Staff Attorney)	\$520.00	\$415.00	8	\$4,160.00	\$3,320.00
Bleichmar Fonti & Auld LLP	WEAVER, LESLEY (Partner)	\$1,310.00	\$895.00	9.4	\$12,314.00	\$8,413.00
Boies, Schiller & Flexner LLP	BUTTERWORTH, BRANDON (Associate)	\$740.00	\$600.00	7	\$5,180.00	\$4,200.00
Boies, Schiller & Flexner LLP	GARCILZAO, GABRIELA (Paralegal)	\$390.00	\$275.00	3.4	\$1,326.00	\$935.00
Boies, Schiller & Flexner LLP	ULRICH, TYLER (Partner)	\$1,150.00	\$895.00	14.2	\$16,330.00	\$12,709.00
Boies, Schiller & Flexner LLP	WITTE, RYAN (Partner)	\$1,160.00	\$895.00	31	\$35,960.00	\$27,745.00
Boies, Schiller & Flexner LLP	ZACK, JASON (Of Counsel)	\$1,130.00	\$895.00	12.7	\$14,351.00	\$11,366.50
Boies, Schiller & Flexner LLP	ZACK, STEPHEN (Partner)	\$1,740.00	\$895.00	13.3	\$23,142.00	\$11,903.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	BARTLETT, CAROLINE (Partner)	\$875.00	\$875.00	14.4	\$12,600.00	\$12,600.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	CECCHI, JAMES (Partner)	\$1,000.00	\$895.00	3.5	\$3,500.00	\$3,132.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	FALDUTO, JEFF (Paralegal)	\$225.00	\$225.00	3.2	\$720.00	\$720.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	MAKHAIL, MARK (Associate)	\$600.00	\$600.00	32.1	\$19,260.00	\$19,260.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	MANORY, WILLIAM (Associate)	\$550.00	\$550.00	5.5	\$3,025.00	\$3,025.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	MANORY, WILLIAM (Paralegal)	\$550.00	\$275.00	11	\$6,050.00	\$3,025.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	MCPHERSON, KEN (Paralegal)	\$225.00	\$225.00	8.2	\$1,845.00	\$1,845.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	RAGO, MARY ELLEN (Paralegal)	\$225.00	\$225.00	0.6	\$135.00	\$135.00

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Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	STEELE, JORDAN (Associate)	\$600.00	\$600.00	88.3	\$52,980.00	\$52,980.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	TAYLOR, LINDSEY (Partner)	\$1,200.00	\$895.00	0.5	\$600.00	\$447.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	BLATT, GAYLE M. (Partner)	\$1,150.00	\$895.00	11	\$12,650.00	\$9,845.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	DAVE, SANJEEV (Staff Attorney)	\$450.00	\$415.00	5.5	\$2,475.00	\$2,282.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	DAVIS, JAMES (Associate)	\$475.00	\$475.00	0.5	\$237.50	\$237.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	DAVIS, MICHELLE (Paralegal)	\$275.00	\$275.00	5.5	\$1,512.50	\$1,512.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	GUERRA, P. CAMILLE (Partner)	\$935.00	\$895.00	40	\$37,400.00	\$35,800.00
Dicello Levitt & Casey LLC	LEVITT, ADAM (Partner)	\$1,430.00	\$895.00	6.8	\$9,724.00	\$6,086.00
Dicello Levitt & Casey LLC	TANGREN, JOHN (Partner)	\$1,210.00	\$895.00	3.1	\$3,751.00	\$2,774.50
Gibbs Law Group, LLP	BLOOMFIELD, JOSHUA (Of Counsel)	\$900.00	\$895.00	352	\$316,800.00	\$315,040.00
Gibbs Law Group, LLP	GIBBS, ERIC (Partner)	\$1,065.00	\$895.00	0.4	\$426.00	\$358.00
Gibbs Law Group, LLP	HUTCHINSON, PARKER (Of Counsel)	\$660.00	\$660.00	8	\$5,280.00	\$5,280.00
Gibbs Law Group, LLP	KOSBIE, JEFF (Associate)	\$605.00	\$600.00	6	\$3,630.00	\$3,600.00
Gibbs Law Group, LLP	LOPEZ, STEVE (Partner)	\$670.00	\$670.00	5.5	\$3,685.00	\$3,685.00
Gibbs Law Group, LLP	MAH, ROSANNE (Of Counsel)	\$740.00	\$740.00	52	\$38,480.00	\$38,480.00
Gibbs Law Group, LLP	PROTHERO, ALYSSA (Of Counsel)	\$415.00	\$415.00	13.3	\$5,519.50	\$5,519.50
Gibbs Law Group, LLP	PROTHERO, ALYSSA (Staff Attorney)	\$415.00	\$415.00	962.4	\$399,396.00	\$399,396.00
Gibbs Law Group, LLP	RIVAS, ROSEMARY (Partner)	\$995.00	\$895.00	28.8	\$28,656.00	\$25,776.00
Hellmuth & Johnson PLLC	CASHMAN, MICHAEL (Partner)	\$895.00	\$895.00	8	\$7,160.00	\$7,160.00
Hellmuth & Johnson PLLC	HAGSTROM, RICHARD (Partner)	\$980.00	\$895.00	0.7	\$686.00	\$626.50
Hellmuth & Johnson PLLC	KUHLMANN, NICHOLAS (Associate)	\$600.00	\$600.00	0.2	\$120.00	\$120.00
Hellmuth & Johnson PLLC	NELSON, BRIAN (Associate)	\$650.00	\$600.00	3.2	\$2,080.00	\$1,920.00
Hellmuth & Johnson PLLC	OTSUKA, GREGORY (Partner)	\$760.00	\$760.00	0.5	\$380.00	\$380.00
Jeffrey Lipinski	LIPINSKI, JEFFREY (Partner)	\$415.00	\$415.00	20.9	\$8,673.50	\$8,673.50
Keller Rohrbach L.L.P.	CAPPIO, GRETCHEN (Partner)	\$1,265.00	\$895.00	43	\$54,395.00	\$38,485.00
Keller Rohrbach L.L.P.	EVANS, JOHN M. (Paralegal)	\$340.00	\$275.00	10.2	\$3,468.00	\$2,805.00
Keller Rohrbach L.L.P.	FIERRO, ERIC (Partner)	\$910.00	\$895.00	39.3	\$35,763.00	\$35,173.50
Keller Rohrbach L.L.P.	GOTTO, ALEX (Paralegal)	\$330.00	\$275.00	0.5	\$165.00	\$137.50
Keller Rohrbach L.L.P.	GUSSIN, ZACHARY (Associate)	\$625.00	\$600.00	42.7	\$26,687.50	\$25,620.00
Keller Rohrbach L.L.P.	HILL, JENNIFER (Paralegal)	\$425.00	\$275.00	0.5	\$212.50	\$137.50
Keller Rohrbach L.L.P.	JONES, KRIS C. (Staff Attorney)	\$480.00	\$415.00	14	\$6,720.00	\$5,810.00
Keller Rohrbach L.L.P.	MARRIOTT, PATRICK T. (Associate)	\$545.00	\$545.00	6	\$3,270.00	\$3,270.00
Keller Rohrbach L.L.P.	MCDEVITT, RYAN (Partner)	\$935.00	\$895.00	168.9	\$157,921.50	\$151,165.50
Keller Rohrbach L.L.P.	MERSING, JACOB (Paralegal)	\$460.00	\$275.00	140.2	\$64,492.00	\$38,555.00
Keller Rohrbach L.L.P.	MITTENTHAL, ROBERT O. (Paralegal)	\$440.00	\$275.00	4.3	\$1,892.00	\$1,182.50
Keller Rohrbach L.L.P.	MOROWITZ, RACHEL (Associate)	\$525.00	\$525.00	47	\$24,675.00	\$24,675.00
Keller Rohrbach L.L.P.	NEALIOUS, BIANCA (Paralegal)	\$335.00	\$275.00	0.4	\$134.00	\$110.00
Keller Rohrbach L.L.P.	PARRILLA, CAVIN L. (Paralegal)	\$340.00	\$275.00	0.7	\$238.00	\$192.50
Keller Rohrbach L.L.P.	READ, SYDNEY (Associate)	\$510.00	\$510.00	362.7	\$184,977.00	\$184,977.00
Keller Rohrbach L.L.P.	STRECKERT, PATRICK M. (Associate)	\$510.00	\$510.00	12.7	\$6,477.00	\$6,477.00
Keller Rohrbach L.L.P.	TIEZAZU, Y. TIZZY (Paralegal)	\$305.00	\$275.00	0.6	\$183.00	\$165.00
Keller Rohrbach L.L.P.	VERDUGO, GABE E. (Associate)	\$630.00	\$600.00	18.8	\$11,844.00	\$11,280.00
Keller Rohrbach L.L.P.	WILSON, KIANA (Paralegal)	\$365.00	\$275.00	2	\$730.00	\$550.00
Kessler Topaz Meltzer & Check, LLP	BLOCK, ADAM (Staff Attorney)	\$370.00	\$370.00	26.8	\$9,916.00	\$9,916.00
Kessler Topaz Meltzer & Check, LLP	CORSON, MEGAN (Paralegal)	\$320.00	\$275.00	14.2	\$4,544.00	\$3,905.00
Kessler Topaz Meltzer & Check, LLP	GRADEN, TYLER (Partner)	\$965.00	\$895.00	0.9	\$868.50	\$805.50
Kessler Topaz Meltzer & Check, LLP	HEMSLEY, COURTNEY (Paralegal)	\$405.00	\$275.00	18.5	\$7,492.50	\$5,087.50
Kessler Topaz Meltzer & Check, LLP	HOWELL, MATTHEW (Associate)	\$420.00	\$420.00	6.9	\$2,898.00	\$2,898.00
Kessler Topaz Meltzer & Check, LLP	LESSER, NATALIE (Associate)	\$535.00	\$535.00	17.2	\$9,202.00	\$9,202.00
Kessler Topaz Meltzer & Check, LLP	MARO, JAMES (Partner)	\$950.00	\$895.00	2.9	\$2,755.00	\$2,595.50

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Kessler Topaz Meltzer & Check, LLP	MCGINLEY, LAUREN (Associate)	\$480.00	\$480.00	16.1	\$7,728.00	\$7,728.00
Kessler Topaz Meltzer & Check, LLP	MELTZER, JOSEPH (Partner)	\$1,000.00	\$895.00	4	\$4,000.00	\$3,580.00
Kessler Topaz Meltzer & Check, LLP	NAJI, JONATHAN (Associate)	\$510.00	\$510.00	6.7	\$3,417.00	\$3,417.00
Kessler Topaz Meltzer & Check, LLP	PAFFAS, HOLLY (Paralegal)	\$320.00	\$275.00	0.3	\$96.00	\$82.50
Kessler Topaz Meltzer & Check, LLP	PARK, ALEX (Associate)	\$480.00	\$480.00	18.3	\$8,784.00	\$8,784.00
Kessler Topaz Meltzer & Check, LLP	PEOPLES, ANDREW (Staff Attorney)	\$455.00	\$415.00	350.6	\$159,523.00	\$145,499.00
Kessler Topaz Meltzer & Check, LLP	PORT, LISA LAMB (Associate)	\$750.00	\$600.00	811.7	\$608,775.00	\$487,020.00
Kessler Topaz Meltzer & Check, LLP	PORT, LISA LAMB (Of Counsel)	\$750.00	\$750.00	0.2	\$150.00	\$150.00
Kessler Topaz Meltzer & Check, LLP	SHERONAS, KELSEY (Associate)	\$510.00	\$510.00	125.1	\$63,801.00	\$63,801.00
Kessler Topaz Meltzer & Check, LLP	TROUTNER, MELISSA (Partner)	\$950.00	\$895.00	26.3	\$24,985.00	\$23,538.50
Kessler Topaz Meltzer & Check, LLP	WINCHESTER, ROBIN (Partner)	\$1,145.00	\$895.00	0.5	\$572.50	\$447.50
Kessler Topaz Meltzer & Check, LLP	YEATES, MELISSA (Partner)	\$1,145.00	\$895.00	12.5	\$14,312.50	\$11,187.50
Law Offices of Richard M. Hagstrom	HAGSTROM, RICHARD (Partner)	\$980.00	\$895.00	4	\$3,920.00	\$3,580.00
Levi & Korsinsky, LLP	RIVAS, ROSEMARY (Partner)	\$995.00	\$895.00	5	\$4,975.00	\$4,475.00
Lieff Cabraser Heimann & Bernstein, LLP	ARSOV, DUSHAN (Paralegal)	\$515.00	\$275.00	4.8	\$2,472.00	\$1,320.00
Lieff Cabraser Heimann & Bernstein, LLP	BALKOSKI, JANE (Paralegal)	\$360.00	\$275.00	0.5	\$180.00	\$137.50
Lieff Cabraser Heimann & Bernstein, LLP	BELUSHKO BARROWS, NIKKI (Paralegal)	\$535.00	\$275.00	0.9	\$481.50	\$247.50
Lieff Cabraser Heimann & Bernstein, LLP	BERTRAM, ANNE (Paralegal)	\$360.00	\$275.00	10.5	\$3,780.00	\$2,887.50
Lieff Cabraser Heimann & Bernstein, LLP	BILKISS, ABBY (Staff Attorney)	\$655.00	\$415.00	8.5	\$5,567.50	\$3,527.50
Lieff Cabraser Heimann & Bernstein, LLP	BROWN, AIDAN (Paralegal)	\$525.00	\$275.00	141.4	\$74,235.00	\$38,885.00
Lieff Cabraser Heimann & Bernstein, LLP	CALANGIAN, MARGIE (Paralegal)	\$565.00	\$275.00	105.4	\$59,551.00	\$28,985.00
Lieff Cabraser Heimann & Bernstein, LLP	CHINN, VICTORIA (Staff Attorney)	\$655.00	\$415.00	760.2	\$497,931.00	\$315,483.00
Lieff Cabraser Heimann & Bernstein, LLP	DESAI, NIMISH (Partner)	\$1,115.00	\$895.00	2.4	\$2,676.00	\$2,148.00
Lieff Cabraser Heimann & Bernstein, LLP	GEISSLER, ROGER (Staff Attorney)	\$630.00	\$415.00	7.5	\$4,725.00	\$3,112.50
Lieff Cabraser Heimann & Bernstein, LLP	GRANT, ANTHONY (Paralegal)	\$565.00	\$275.00	164.5	\$92,942.50	\$45,237.50
Lieff Cabraser Heimann & Bernstein, LLP	JORDAN, CHRISTOPHER (Staff Attorney)	\$630.00	\$415.00	23.8	\$14,994.00	\$9,877.00
Lieff Cabraser Heimann & Bernstein, LLP	KENFIELD-KELLEHER, MURIEL (Associate)	\$655.00	\$600.00	634	\$415,270.00	\$380,400.00
Lieff Cabraser Heimann & Bernstein, LLP	KIM, SUN (Contract Attorney)	\$630.00	\$630.00	29.9	\$18,837.00	\$18,837.00
Lieff Cabraser Heimann & Bernstein, LLP	KRAVATZ, JILLIAN (Paralegal)	\$415.00	\$275.00	11.2	\$4,648.00	\$3,080.00
Lieff Cabraser Heimann & Bernstein, LLP	KRUGER, ERIK (Paralegal)	\$540.00	\$275.00	1.3	\$702.00	\$357.50
Lieff Cabraser Heimann & Bernstein, LLP	LICHTMAN, JASON (Partner)	\$1,080.00	\$895.00	4.1	\$4,428.00	\$3,669.50
Lieff Cabraser Heimann & Bernstein, LLP	LIM, SOOKYUNG (Contract Attorney)	\$525.00	\$525.00	14.5	\$7,612.50	\$7,612.50
Lieff Cabraser Heimann & Bernstein, LLP	LIM, TRACY (Paralegal)	\$465.00	\$275.00	0.2	\$93.00	\$55.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Associate)	\$820.00	\$600.00	281.6	\$230,912.00	\$168,960.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Partner)	\$820.00	\$820.00	347.2	\$284,704.00	\$284,704.00
Lieff Cabraser Heimann & Bernstein, LLP	MILORO, SCOTT (Staff Attorney)	\$655.00	\$415.00	13.1	\$8,580.50	\$5,436.50
Lieff Cabraser Heimann & Bernstein, LLP	NGUYEN, PHONG-CHAU (Partner)	\$880.00	\$880.00	327.2	\$287,936.00	\$287,936.00
Lieff Cabraser Heimann & Bernstein, LLP	NICOLAOU, JOHN (Partner)	\$880.00	\$880.00	1056.8	\$929,984.00	\$929,984.00
Lieff Cabraser Heimann & Bernstein, LLP	OH, MARISSA (Staff Attorney)	\$630.00	\$415.00	766.2	\$482,706.00	\$317,973.00
Lieff Cabraser Heimann & Bernstein, LLP	OXMAN, ELLY (Paralegal)	\$565.00	\$275.00	17.5	\$9,887.50	\$4,812.50
Lieff Cabraser Heimann & Bernstein, LLP	PUSTILNIK, ALIX (Staff Attorney)	\$415.00	\$415.00	396	\$164,340.00	\$164,340.00
Lieff Cabraser Heimann & Bernstein, LLP	RAHIMI, FAWAD (Paralegal)	\$565.00	\$275.00	145.3	\$82,094.50	\$39,957.50
Lieff Cabraser Heimann & Bernstein, LLP	STELLINGS, DAVID (Partner)	\$1,440.00	\$895.00	156.8	\$225,792.00	\$140,336.00
Lieff Cabraser Heimann & Bernstein, LLP	TARPEH, JLE (Paralegal)	\$540.00	\$275.00	26.3	\$14,202.00	\$7,232.50
Lieff Cabraser Heimann & Bernstein, LLP	TEXIER, MUNA (Paralegal)	\$565.00	\$275.00	48.5	\$27,402.50	\$13,337.50
Podhurst Orseck, P.A.	DEL RIEGO, ALISSA (Associate)	\$655.00	\$600.00	28.5	\$18,667.50	\$17,100.00
Podhurst Orseck, P.A.	GRAVANTE, JOHN (Partner)	\$755.00	\$755.00	68.9	\$52,019.50	\$52,019.50
Podhurst Orseck, P.A.	PELL, STEPHANIE (Contract Attorney)	\$445.00	\$445.00	95.5	\$42,497.50	\$42,497.50
Podhurst Orseck, P.A.	PELL, STEPHANIE (Staff Attorney)	\$445.00	\$415.00	17	\$7,565.00	\$7,055.00
Podhurst Orseck, P.A.	PRIETO, PETER (Partner)	\$1,275.00	\$895.00	1.5	\$1,912.50	\$1,342.50

Exhibit A - Summary of Hours and Lodestar Organized by Task Codes

Podhurst Orseck, P.A.	WEINSHALL, MATT (Partner)	\$755.00	\$755.00	0.5	\$377.50	\$377.50
Podhurst Orseck, P.A.	YARZABAL, ILIANA (Paralegal)	\$345.00	\$275.00	95.7	\$33,016.50	\$26,317.50
Pritzker Levine LLP	HAGGARTY, HEATHER (Associate)	\$850.00	\$600.00	0.2	\$170.00	\$120.00
Pritzker Levine LLP	LEVINE, JONATHAN (Partner)	\$1,100.00	\$895.00	15.3	\$16,830.00	\$13,693.50
Robbins Geller Rudman and Dowd LLP	ALPERSTEIN, JASON (Partner)	\$840.00	\$840.00	2.8	\$2,352.00	\$2,352.00
Robbins Geller Rudman and Dowd LLP	BEALL, BRADLEY (Associate)	\$515.00	\$515.00	61.2	\$31,518.00	\$31,518.00
Robbins Geller Rudman and Dowd LLP	COHEN, ALEXANDER (Associate)	\$560.00	\$560.00	2.9	\$1,624.00	\$1,624.00
Robbins Geller Rudman and Dowd LLP	DEARMAN, MARK (Partner)	\$1,100.00	\$895.00	16.5	\$18,150.00	\$14,767.50
Robbins Geller Rudman and Dowd LLP	JENSEN, RACHEL (Partner)	\$985.00	\$895.00	34.9	\$34,376.50	\$31,235.50
Robbins Geller Rudman and Dowd LLP	PUERTO, PATRICIA (Paralegal)	\$410.00	\$275.00	1.4	\$574.00	\$385.00
Robbins Geller Rudman and Dowd LLP	SAWYER, MAXWELL (Associate)	\$475.00	\$475.00	4.8	\$2,280.00	\$2,280.00
Robbins Geller Rudman and Dowd LLP	SCIALPI, FACUNDO (Associate)	\$465.00	\$465.00	5.6	\$2,604.00	\$2,604.00
Robbins Geller Rudman and Dowd LLP	TACK, DEBORAH (Paralegal)	\$410.00	\$275.00	1.7	\$697.00	\$467.50
Robins Kaplan, LLP	HURT, J. AUSTIN (Of Counsel)	\$1,050.00	\$895.00	163.6	\$171,780.00	\$146,422.00
Robins Kaplan, LLP	HURT, J. AUSTIN (Partner)	\$1,050.00	\$895.00	164.6	\$172,830.00	\$147,317.00
Robins Kaplan, LLP	PACELLI, MICHAEL J. (Associate)	\$795.00	\$600.00	106.3	\$84,508.50	\$63,780.00
Robins Kaplan, LLP	POTTER, ANN M. (Paralegal)	\$410.00	\$275.00	14.6	\$5,986.00	\$4,015.00
Robins Kaplan, LLP	SLAUGHTER, STACEY P. (Partner)	\$1,280.00	\$895.00	48.7	\$62,336.00	\$43,586.50
Robins Kaplan, LLP	WILSON, STACEY (Staff Attorney)	\$400.00	\$400.00	1	\$400.00	\$400.00
Seeger Weiss LLP	AYERS, CHRISTOPHER (Partner)	\$1,075.00	\$895.00	34.7	\$37,302.50	\$31,056.50
Seeger Weiss LLP	AZARIAN, NICOLE (Paralegal)	\$275.00	\$275.00	4.9	\$1,347.50	\$1,347.50
Seeger Weiss LLP	KRAMER, LESLIE (Paralegal)	\$295.00	\$275.00	19.3	\$5,693.50	\$5,307.50
Seeger Weiss LLP	ROINICK, SUSAN (Staff Attorney)	\$575.00	\$415.00	6.3	\$3,622.50	\$2,614.50
Seeger Weiss LLP	SAFDAR, HUMAIRA (Associate)	\$525.00	\$525.00	4.3	\$2,257.50	\$2,257.50
Seeger Weiss LLP	TAWIL, DAVID (Associate)	\$675.00	\$600.00	10.8	\$7,290.00	\$6,480.00
Seeger Weiss LLP	TYJER, SABRINA (Paralegal)	\$395.00	\$275.00	5.2	\$2,054.00	\$1,430.00
Total Task Category 4				20153.5	\$12,893,206.50	\$11,069,843.50
<i>Task Category 5: Document Review</i>						
Firm	Timekeeper	Standard Hourly Rate	Reduced Hourly Rate	Hours	Standard Hourly Lodestar	Reduced Hourly Lodestar
Ahdoot & Wolfson	DEONNA, CHLOE (Associate)	\$550.00	\$415.00	767	\$421,850.00	\$318,305.00
Ahdoot & Wolfson	EVERETT, JAKARAH (Associate)	\$550.00	\$415.00	34	\$18,700.00	\$14,110.00
Ahdoot & Wolfson	STINER, CHRISTOPHER (Partner)	\$975.00	\$415.00	0.7	\$682.50	\$290.50
Ahdoot & Wolfson	UNAL, SARPER (Associate)	\$625.00	\$415.00	660.8	\$413,000.00	\$274,232.00
Ahdoot & Wolfson	WOLFSON, TINA (Partner)	\$1,300.00	\$415.00	0.3	\$390.00	\$124.50
Baron & Budd, P.C.	ALLEN, MOLLY GOZA (Staff Attorney)	\$415.00	\$415.00	1916.5	\$795,347.50	\$795,347.50
Baron & Budd, P.C.	BAIRD, JOSEPH (Staff Attorney)	\$415.00	\$415.00	119.5	\$49,592.50	\$49,592.50
Baron & Budd, P.C.	BENAVIDEZ, ERNEST (Paralegal)	\$250.00	\$250.00	65.9	\$16,475.00	\$16,475.00
Baron & Budd, P.C.	BROWN, AARON (Staff Attorney)	\$415.00	\$415.00	191	\$79,265.00	\$79,265.00
Baron & Budd, P.C.	BROWN, ANGELA (Staff Attorney)	\$415.00	\$415.00	37.8	\$15,687.00	\$15,687.00
Baron & Budd, P.C.	CLUFF, STERLING (Associate)	\$675.00	\$415.00	3.2	\$2,160.00	\$1,328.00
Baron & Budd, P.C.	DARCHE, BENJAMIN (Staff Attorney)	\$415.00	\$415.00	216	\$89,640.00	\$89,640.00
Baron & Budd, P.C.	DOBBS, MICHAEL (Associate)	\$600.00	\$415.00	0.2	\$120.00	\$83.00
Baron & Budd, P.C.	ENGLISH, LYNNZE (Staff Attorney)	\$415.00	\$415.00	251.7	\$104,455.50	\$104,455.50
Baron & Budd, P.C.	FERNANDES, DAVID B. (Associate)	\$795.00	\$415.00	279	\$221,805.00	\$115,785.00
Baron & Budd, P.C.	FRANKLIN-ROBINSON, LAKENYA (Staff Attorney)	\$415.00	\$415.00	986	\$409,190.00	\$409,190.00
Baron & Budd, P.C.	HANDT, JULIA (Staff Attorney)	\$415.00	\$415.00	39.3	\$16,309.50	\$16,309.50
Baron & Budd, P.C.	HEILMAN, JOE (Staff Attorney)	\$415.00	\$415.00	796.5	\$330,547.50	\$330,547.50
Baron & Budd, P.C.	IRISH, JASON (Staff Attorney)	\$415.00	\$415.00	45	\$18,675.00	\$18,675.00
Baron & Budd, P.C.	KENT, JOSEPH (Staff Attorney)	\$415.00	\$415.00	1089	\$451,935.00	\$451,935.00
Baron & Budd, P.C.	KORFF, LYDIA (Staff Attorney)	\$415.00	\$415.00	120.8	\$50,132.00	\$50,132.00

Exhibit A - Summary of Hours and Lodestar Organized by Task Codes

Baron & Budd, P.C.	LAWSON, MELANIE (Staff Attorney)	\$415.00	\$415.00	184.7	\$76,650.50	\$76,650.50
Baron & Budd, P.C.	LEVINE, HARRISON M. (Staff Attorney)	\$415.00	\$415.00	210.1	\$87,191.50	\$87,191.50
Baron & Budd, P.C.	LICHTER, JAY MICHAEL (Associate)	\$795.00	\$415.00	7.6	\$6,042.00	\$3,154.00
Baron & Budd, P.C.	LIPINSKI, JEFFREY (Staff Attorney)	\$415.00	\$415.00	869.9	\$361,008.50	\$361,008.50
Baron & Budd, P.C.	MANN, JONAS (Associate)	\$600.00	\$415.00	17	\$10,200.00	\$7,055.00
Baron & Budd, P.C.	MCDONALD, PAUL (Staff Attorney)	\$415.00	\$415.00	304	\$126,160.00	\$126,160.00
Baron & Budd, P.C.	MUTOMBO, MONIQUE (Staff Attorney)	\$415.00	\$415.00	1022	\$424,130.00	\$424,130.00
Baron & Budd, P.C.	NEAL, RAVYN (Staff Attorney)	\$415.00	\$415.00	1928.2	\$800,203.00	\$800,203.00
Baron & Budd, P.C.	OEFFNER, JESSICA (Staff Attorney)	\$415.00	\$415.00	236	\$97,940.00	\$97,940.00
Baron & Budd, P.C.	OETTINGER, DANIEL (Staff Attorney)	\$415.00	\$415.00	824	\$341,960.00	\$341,960.00
Baron & Budd, P.C.	PERSAND, VIVIAN (Staff Attorney)	\$415.00	\$415.00	375.3	\$155,749.50	\$155,749.50
Baron & Budd, P.C.	PETTY, TAYLOR (Staff Attorney)	\$415.00	\$415.00	122.3	\$50,754.50	\$50,754.50
Baron & Budd, P.C.	RABESS, CLEMENT (Staff Attorney)	\$415.00	\$415.00	3592	\$1,490,680.00	\$1,490,680.00
Baron & Budd, P.C.	ROBELOT, RYAN A. (Staff Attorney)	\$415.00	\$415.00	335.3	\$139,149.50	\$139,149.50
Baron & Budd, P.C.	ROYSTER, SHANNON (Associate)	\$625.00	\$415.00	129.3	\$80,812.50	\$53,659.50
Baron & Budd, P.C.	SALAZAR, ERIKA (Staff Attorney)	\$415.00	\$415.00	296	\$122,840.00	\$122,840.00
Baron & Budd, P.C.	SHAFFIN, ORI (Staff Attorney)	\$415.00	\$415.00	2535.2	\$1,052,108.00	\$1,052,108.00
Baron & Budd, P.C.	SMILEY, ELIZABETH (Associate)	\$575.00	\$415.00	4.1	\$2,357.50	\$1,701.50
Baron & Budd, P.C.	SON, DAVID (Staff Attorney)	\$415.00	\$415.00	1168	\$484,720.00	\$484,720.00
Baron & Budd, P.C.	TAMBURELLI, ADAM (Associate)	\$795.00	\$415.00	229.1	\$182,134.50	\$95,076.50
Baron & Budd, P.C.	TELLIS, ROLAND (Partner)	\$1,200.00	\$415.00	20.1	\$24,120.00	\$8,341.50
Baron & Budd, P.C.	TURNER, MEGHAN (Staff Attorney)	\$415.00	\$415.00	224	\$92,960.00	\$92,960.00
Baron & Budd, P.C.	YI, KIMBERLY (Staff Attorney)	\$415.00	\$415.00	304	\$126,160.00	\$126,160.00
Beasley Allen Crow Methvin Portis & Miles, PC	MANN, TRENT (Associate)	\$550.00	\$415.00	440.4	\$242,220.00	\$182,766.00
Beasley Allen Crow Methvin Portis & Miles, PC	WYNN, JONATHAN ()	\$415.00	\$415.00	216.1	\$89,681.50	\$89,681.50
Beasley Allen Crow Methvin Portis & Miles, PC	WYNN, JONATHAN (Staff Attorney)	\$415.00	\$415.00	68.6	\$28,469.00	\$28,469.00
Bleichmar Fonti & Auld LLP	KOO, JOOYOUNG (Staff Attorney)	\$575.00	\$415.00	911.7	\$524,227.50	\$378,355.50
Bleichmar Fonti & Auld LLP	ORNELAS, ANGELICA (Associate)	\$760.00	\$415.00	0.1	\$76.00	\$41.50
Bleichmar Fonti & Auld LLP	SUM, SYLVIA (Staff Attorney)	\$495.00	\$415.00	1389.7	\$687,901.50	\$576,725.50
Boies, Schiller & Flexner LLP	ULRICH, TYLER (Partner)	\$1,150.00	\$415.00	18.9	\$21,735.00	\$7,843.50
Boies, Schiller & Flexner LLP	WITTE, RYAN (Partner)	\$1,160.00	\$415.00	1.9	\$2,204.00	\$788.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	BARTLETT, CAROLINE (Partner)	\$875.00	\$415.00	10.2	\$8,925.00	\$4,233.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	BOWER, ZACH (Partner)	\$875.00	\$415.00	4.5	\$3,937.50	\$1,867.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	FALDUTO, JEFF (Paralegal)	\$225.00	\$225.00	4.3	\$967.50	\$967.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	HASSAN, NAJMA (Paralegal)	\$125.00	\$125.00	34.8	\$4,350.00	\$4,350.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	LETTIRE, IAN (Paralegal)	\$225.00	\$225.00	9.3	\$2,092.50	\$2,092.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	MANORY, WILLIAM (Associate)	\$550.00	\$415.00	1.4	\$770.00	\$581.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	MANORY, WILLIAM (Paralegal)	\$550.00	\$275.00	7	\$3,850.00	\$1,925.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	PATEL, ANTRA (Paralegal)	\$125.00	\$125.00	47.5	\$5,937.50	\$5,937.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	RAGO, MARY ELLEN (Paralegal)	\$225.00	\$225.00	0.3	\$67.50	\$67.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	STEELE, JORDAN (Associate)	\$600.00	\$415.00	5.5	\$3,300.00	\$2,282.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	TEMPTESTA, LAURA (Paralegal)	\$225.00	\$225.00	12.8	\$2,880.00	\$2,880.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	TYSON, STEVEN (Associate)	\$550.00	\$415.00	20.2	\$11,110.00	\$8,383.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	BLATT, GAYLE M. (Partner)	\$1,150.00	\$415.00	0.2	\$230.00	\$83.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	DAVE, SANJEEV (Staff Attorney)	\$450.00	\$415.00	2775.3	\$1,248,885.00	\$1,151,749.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	GUERRA, P. CAMILLE (Partner)	\$935.00	\$415.00	0.9	\$841.50	\$373.50
Gibbs Law Group, LLP	BLOOMFIELD, JOSHUA (Of Counsel)	\$900.00	\$415.00	100.7	\$90,630.00	\$41,790.50
Gibbs Law Group, LLP	GARDNER, DORRY (Staff Attorney)	\$415.00	\$415.00	1296.8	\$538,172.00	\$538,172.00
Gibbs Law Group, LLP	PROTHERO, ALYSSA (Staff Attorney)	\$415.00	\$415.00	1674.7	\$695,000.50	\$695,000.50
Gibbs Law Group, LLP	RIVAS, ROSEMARY (Partner)	\$995.00	\$415.00	1.3	\$1,293.50	\$539.50

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Hellmuth & Johnson PLLC	NELSON, BRIAN (Associate)	\$650.00	\$415.00	2.1	\$1,365.00	\$871.50
Jeffrey Lipinski	LIPINSKI, JEFFREY (Partner)	\$415.00	\$415.00	202.5	\$84,037.50	\$84,037.50
Keller Rohrbach L.L.P.	FIERRO, ERIC (Partner)	\$910.00	\$415.00	4	\$3,640.00	\$1,660.00
Keller Rohrbach L.L.P.	JONES, KRIS C. (Staff Attorney)	\$480.00	\$415.00	1806.9	\$867,312.00	\$749,863.50
Keller Rohrbach L.L.P.	MCDEVITT, RYAN (Partner)	\$935.00	\$415.00	4.6	\$4,301.00	\$1,909.00
Keller Rohrbach L.L.P.	MERSING, JACOB (Paralegal)	\$460.00	\$275.00	2.6	\$1,196.00	\$715.00
Kessler Topaz Meltzer & Check, LLP	BLOCK, ADAM (Contract Attorney)	\$370.00	\$370.00	218	\$80,660.00	\$80,660.00
Kessler Topaz Meltzer & Check, LLP	BLOCK, ADAM (Staff Attorney)	\$370.00	\$370.00	819.9	\$303,363.00	\$303,363.00
Kessler Topaz Meltzer & Check, LLP	GILLIS, MARTHA (Contract Attorney)	\$370.00	\$370.00	44.1	\$16,317.00	\$16,317.00
Kessler Topaz Meltzer & Check, LLP	PEOPLES, ANDREW (Staff Attorney)	\$455.00	\$415.00	88.2	\$40,131.00	\$36,603.00
Kessler Topaz Meltzer & Check, LLP	PHAM, HIEN (Contract Attorney)	\$370.00	\$370.00	55.3	\$20,461.00	\$20,461.00
Levi & Korsinsky, LLP	MACCARONE, COURTNEY (Associate)	\$675.00	\$415.00	0.5	\$337.50	\$207.50
Levi & Korsinsky, LLP	MESSINA, RYAN (Staff Attorney)	\$500.00	\$415.00	2.1	\$1,050.00	\$871.50
Levi & Korsinsky, LLP	RIVAS, ROSEMARY (Partner)	\$995.00	\$415.00	1.2	\$1,194.00	\$498.00
Lieff Cabraser Heimann & Bernstein, LLP	ANTHONY, RICHARD (Paralegal)	\$535.00	\$275.00	7.9	\$4,226.50	\$2,172.50
Lieff Cabraser Heimann & Bernstein, LLP	ARSOV, DUSHAN (Paralegal)	\$515.00	\$275.00	0.3	\$154.50	\$82.50
Lieff Cabraser Heimann & Bernstein, LLP	BILKISS, ABBY (Staff Attorney)	\$655.00	\$415.00	381	\$249,555.00	\$158,115.00
Lieff Cabraser Heimann & Bernstein, LLP	CALANGIAN, MARGIE (Paralegal)	\$565.00	\$275.00	24.4	\$13,786.00	\$6,710.00
Lieff Cabraser Heimann & Bernstein, LLP	CHINN, VICTORIA (Staff Attorney)	\$655.00	\$415.00	1816.6	\$1,189,873.00	\$753,889.00
Lieff Cabraser Heimann & Bernstein, LLP	GEISSLER, ROGER (Staff Attorney)	\$630.00	\$415.00	1706.2	\$1,074,906.00	\$708,073.00
Lieff Cabraser Heimann & Bernstein, LLP	GRANT, ANTHONY (Paralegal)	\$565.00	\$275.00	97	\$54,805.00	\$26,675.00
Lieff Cabraser Heimann & Bernstein, LLP	JONES, KAREN (Staff Attorney)	\$655.00	\$415.00	161.4	\$105,717.00	\$66,981.00
Lieff Cabraser Heimann & Bernstein, LLP	JORDAN, CHRISTOPHER (Staff Attorney)	\$630.00	\$415.00	3656.6	\$2,303,658.00	\$1,517,489.00
Lieff Cabraser Heimann & Bernstein, LLP	KENFIELD-KELLEHER, MURIEL (Associate)	\$655.00	\$415.00	46.5	\$30,457.50	\$19,297.50
Lieff Cabraser Heimann & Bernstein, LLP	KIM, SUN (Contract Attorney)	\$630.00	\$415.00	256	\$161,280.00	\$106,240.00
Lieff Cabraser Heimann & Bernstein, LLP	LIM, SOOKYUNG (Contract Attorney)	\$525.00	\$415.00	281.5	\$147,787.50	\$116,822.50
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Associate)	\$820.00	\$415.00	13.3	\$10,906.00	\$5,519.50
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Partner)	\$820.00	\$415.00	11.2	\$9,184.00	\$4,648.00
Lieff Cabraser Heimann & Bernstein, LLP	MILORO, SCOTT (Staff Attorney)	\$655.00	\$415.00	4978.9	\$3,261,179.50	\$2,066,243.50
Lieff Cabraser Heimann & Bernstein, LLP	NGUYEN, PHONG-CHAU (Partner)	\$880.00	\$415.00	0.2	\$176.00	\$83.00
Lieff Cabraser Heimann & Bernstein, LLP	NICOLAOU, JOHN (Partner)	\$880.00	\$415.00	275.4	\$242,352.00	\$114,291.00
Lieff Cabraser Heimann & Bernstein, LLP	OH, MARISSA (Staff Attorney)	\$630.00	\$415.00	3870.7	\$2,438,541.00	\$1,606,340.50
Lieff Cabraser Heimann & Bernstein, LLP	OXMAN, ELLY (Paralegal)	\$565.00	\$275.00	33.8	\$19,097.00	\$9,295.00
Lieff Cabraser Heimann & Bernstein, LLP	RAHIMI, FAWAD (Paralegal)	\$565.00	\$275.00	25.8	\$14,577.00	\$7,095.00
Lieff Cabraser Heimann & Bernstein, LLP	SHINDELBOWER, JERRY (Staff Attorney)	\$630.00	\$415.00	40	\$25,200.00	\$16,600.00
Lieff Cabraser Heimann & Bernstein, LLP	TEXIER, MUNA (Paralegal)	\$565.00	\$275.00	87.9	\$49,663.50	\$24,172.50
Podhurst Orseck, P.A.	GRAVANTE, JOHN (Partner)	\$755.00	\$415.00	1	\$755.00	\$415.00
Podhurst Orseck, P.A.	PELL, STEPHANIE (Contract Attorney)	\$445.00	\$415.00	342.2	\$152,279.00	\$142,013.00
Podhurst Orseck, P.A.	PELL, STEPHANIE (Staff Attorney)	\$445.00	\$415.00	2735.6	\$1,217,342.00	\$1,135,274.00
Podhurst Orseck, P.A.	PRIETO, PETER (Partner)	\$1,275.00	\$415.00	0.5	\$637.50	\$207.50
Podhurst Orseck, P.A.	SPULAK, MATT (Staff Attorney)	\$755.00	\$415.00	5	\$3,775.00	\$2,075.00
Pritzker Levine LLP	WHITNEY, ANNE (Associate)	\$700.00	\$415.00	360	\$252,000.00	\$149,400.00
Robbins Geller Rudman and Dowd LLP	DONOVAN, BYRON (Staff Attorney)	\$440.00	\$415.00	9	\$3,960.00	\$3,735.00
Robins Kaplan, LLP	HURT, J. AUSTIN (Of Counsel)	\$1,050.00	\$415.00	2	\$2,100.00	\$830.00
Robins Kaplan, LLP	HURT, J. AUSTIN (Partner)	\$1,050.00	\$415.00	0.4	\$420.00	\$166.00
Robins Kaplan, LLP	LARSON, TAMARA L. (Staff Attorney)	\$365.00	\$365.00	0.1	\$36.50	\$36.50
Robins Kaplan, LLP	SLAUGHTER, STACEY P. (Partner)	\$1,280.00	\$415.00	1.6	\$2,048.00	\$664.00
Total Task Category 5				56095.5	\$28,529,545.00	\$23,148,497.50
<i>Task Category 6: Pleadings, Briefs and Legal Research</i>						
Firm	Timekeeper	Standard Hourly Rate	Reduced Hourly Rate	Hours	Standard Hourly Lodestar	Reduced Hourly Lodestar

Exhibit A - Summary of Hours and Lodestar Organized by Task Codes

Ahdoot & Wolfson	AHDOOT, ROBERT (Partner)	\$1,300.00	\$895.00	5.2	\$6,760.00	\$4,654.00
Ahdoot & Wolfson	CABRERA, KATHRYN (Paralegal)	\$350.00	\$275.00	1.4	\$490.00	\$385.00
Ahdoot & Wolfson	DEONNA, CHLOE (Associate)	\$550.00	\$550.00	37.8	\$20,790.00	\$20,790.00
Ahdoot & Wolfson	EVERETT, JAKARAH (Associate)	\$550.00	\$550.00	13.4	\$7,370.00	\$7,370.00
Ahdoot & Wolfson	GLEZAKOS, RUHANDY (Associate)	\$450.00	\$450.00	17.5	\$7,875.00	\$7,875.00
Ahdoot & Wolfson	KELSTON, HENRY (Partner)	\$1,100.00	\$895.00	20.7	\$22,770.00	\$18,526.50
Ahdoot & Wolfson	KING, BRADLEY (Partner)	\$900.00	\$895.00	82.8	\$74,520.00	\$74,106.00
Ahdoot & Wolfson	MAYA, THEODORE (Partner)	\$1,100.00	\$895.00	10.6	\$11,660.00	\$9,487.00
Ahdoot & Wolfson	STINER, CHRISTOPHER (Partner)	\$975.00	\$895.00	132.4	\$129,090.00	\$118,498.00
Ahdoot & Wolfson	UNAL, SARPER (Associate)	\$625.00	\$600.00	11.3	\$7,062.50	\$6,780.00
Ahdoot & Wolfson	WOLFSON, TINA (Partner)	\$1,300.00	\$895.00	73.1	\$95,030.00	\$65,424.50
Baron & Budd, P.C.	BENAVIDEZ, ERNEST (Paralegal)	\$250.00	\$250.00	198	\$49,500.00	\$49,500.00
Baron & Budd, P.C.	BROWN, AARON (Staff Attorney)	\$415.00	\$415.00	47	\$19,505.00	\$19,505.00
Baron & Budd, P.C.	CLUFF, STERLING (Associate)	\$675.00	\$600.00	5.2	\$3,510.00	\$3,120.00
Baron & Budd, P.C.	DOBBS, MICHAEL (Associate)	\$600.00	\$600.00	12.4	\$7,440.00	\$7,440.00
Baron & Budd, P.C.	ELLING, KELSEY (Associate)	\$600.00	\$600.00	1.7	\$1,020.00	\$1,020.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Associate)	\$795.00	\$600.00	1550.8	\$1,232,886.00	\$930,480.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Partner)	\$795.00	\$795.00	18.2	\$14,469.00	\$14,469.00
Baron & Budd, P.C.	LICHTER, JAY MICHAEL (Associate)	\$795.00	\$600.00	3.5	\$2,782.50	\$2,100.00
Baron & Budd, P.C.	MANN, JONAS (Associate)	\$600.00	\$600.00	125.2	\$75,120.00	\$75,120.00
Baron & Budd, P.C.	OETTINGER, DANIEL (Staff Attorney)	\$415.00	\$415.00	8	\$3,320.00	\$3,320.00
Baron & Budd, P.C.	PACELLI, MICHAEL (Associate)	\$600.00	\$600.00	4.1	\$2,460.00	\$2,460.00
Baron & Budd, P.C.	RABESS, CLEMENT (Staff Attorney)	\$415.00	\$415.00	32	\$13,280.00	\$13,280.00
Baron & Budd, P.C.	ROYSTER, SHANNON (Associate)	\$625.00	\$600.00	641	\$400,625.00	\$384,600.00
Baron & Budd, P.C.	SMILEY, ELIZABETH (Associate)	\$575.00	\$575.00	156.5	\$89,987.50	\$89,987.50
Baron & Budd, P.C.	TAMBURELLI, ADAM (Associate)	\$795.00	\$600.00	2159.1	\$1,716,484.50	\$1,295,460.00
Baron & Budd, P.C.	TAMBURELLI, ADAM (Partner)	\$795.00	\$795.00	10.4	\$8,268.00	\$8,268.00
Baron & Budd, P.C.	TELLIS, ROLAND (Partner)	\$1,200.00	\$895.00	320.8	\$384,960.00	\$287,116.00
Beasley Allen Crow Methvin Portis & Miles, PC	BALDWIN, CHRIS (Staff Attorney)	\$350.00	\$350.00	17.5	\$6,125.00	\$6,125.00
Beasley Allen Crow Methvin Portis & Miles, PC	BARNETT, CLAY (Partner)	\$1,100.00	\$895.00	103.8	\$114,180.00	\$92,901.00
Beasley Allen Crow Methvin Portis & Miles, PC	BOYD, RACHEL (Associate)	\$750.00	\$600.00	10.3	\$7,725.00	\$6,180.00
Beasley Allen Crow Methvin Portis & Miles, PC	MARTIN, DYLAN (Associate)	\$550.00	\$550.00	3.3	\$1,815.00	\$1,815.00
Beasley Allen Crow Methvin Portis & Miles, PC	MILES, DEE (Partner)	\$1,100.00	\$895.00	137.7	\$151,470.00	\$123,241.50
Beasley Allen Crow Methvin Portis & Miles, PC	RUSSELL, BRENDA (Paralegal)	\$275.00	\$275.00	18.8	\$5,170.00	\$5,170.00
Beasley Allen Crow Methvin Portis & Miles, PC	WILLIAMS, MITCH (Associate)	\$650.00	\$600.00	73.2	\$47,580.00	\$43,920.00
Bleichmar Fonti & Auld LLP	BERTERO, ANTHONY (Staff Attorney)	\$450.00	\$415.00	2.5	\$1,125.00	\$1,037.50
Bleichmar Fonti & Auld LLP	DAVIS, ANNE (Partner)	\$995.00	\$895.00	38.1	\$37,909.50	\$34,099.50
Bleichmar Fonti & Auld LLP	KOO, JOOYOUNG (Staff Attorney)	\$575.00	\$415.00	59.6	\$34,270.00	\$24,734.00
Bleichmar Fonti & Auld LLP	LAW, JULIE (Paralegal)	\$415.00	\$275.00	0.4	\$166.00	\$110.00
Bleichmar Fonti & Auld LLP	ORNELAS, ANGELICA (Associate)	\$760.00	\$600.00	115	\$87,400.00	\$69,000.00
Bleichmar Fonti & Auld LLP	ROBERTSON, KELSEY (Staff Attorney)	\$350.00	\$350.00	2.7	\$945.00	\$945.00
Bleichmar Fonti & Auld LLP	SAMRA, JOSHUA (Associate)	\$795.00	\$600.00	12	\$9,540.00	\$7,200.00
Bleichmar Fonti & Auld LLP	SIMNOWITZ, SARA (Associate)	\$940.00	\$600.00	1.3	\$1,222.00	\$780.00
Bleichmar Fonti & Auld LLP	SULLIVAN, KASEY (Staff Attorney)	\$580.00	\$415.00	9	\$5,220.00	\$3,735.00
Bleichmar Fonti & Auld LLP	SUM, SYLVIA (Staff Attorney)	\$495.00	\$415.00	16.2	\$8,019.00	\$6,723.00
Bleichmar Fonti & Auld LLP	TAMONDONG, CESAR (Paralegal)	\$350.00	\$275.00	3.9	\$1,365.00	\$1,072.50
Bleichmar Fonti & Auld LLP	TSURUDOME, GLEN (Staff Attorney)	\$520.00	\$415.00	43.5	\$22,620.00	\$18,052.50
Bleichmar Fonti & Auld LLP	WEAVER, LESLEY (Partner)	\$1,310.00	\$895.00	33.2	\$43,492.00	\$29,714.00
Boies, Schiller & Flexner LLP	BEATON, MARCOS (Of Counsel)	\$790.00	\$790.00	121.7	\$96,143.00	\$96,143.00
Boies, Schiller & Flexner LLP	BUTTERWORTH, BRANDON (Associate)	\$740.00	\$600.00	262.9	\$194,546.00	\$157,740.00

Exhibit A - Summary of Hours and Lodestar Organized by Task Codes

Boies, Schiller & Flexner LLP	HARRISON, LASELVE (Associate)	\$740.00	\$600.00	181.9	\$134,606.00	\$109,140.00
Boies, Schiller & Flexner LLP	LICATA, SAMANTHA (Associate)	\$670.00	\$600.00	149.6	\$100,232.00	\$89,760.00
Boies, Schiller & Flexner LLP	MIKULIC, MICHAEL (Associate)	\$740.00	\$600.00	72.5	\$53,650.00	\$43,500.00
Boies, Schiller & Flexner LLP	SCHIFMAN, JARED (Associate)	\$450.00	\$450.00	9.5	\$4,275.00	\$4,275.00
Boies, Schiller & Flexner LLP	ULRICH, TYLER (Partner)	\$1,150.00	\$895.00	78.4	\$90,160.00	\$70,168.00
Boies, Schiller & Flexner LLP	VOEGELE, JONATHAN (Associate)	\$770.00	\$600.00	45	\$34,650.00	\$27,000.00
Boies, Schiller & Flexner LLP	WITTE, RYAN (Partner)	\$1,160.00	\$895.00	224.8	\$260,768.00	\$201,196.00
Boies, Schiller & Flexner LLP	ZACK, STEPHEN (Partner)	\$1,740.00	\$895.00	152.2	\$264,828.00	\$136,219.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	STEELE, JORDAN (Associate)	\$600.00	\$600.00	1.2	\$720.00	\$720.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	BARRON, SETH (Associate)	\$375.00	\$375.00	13.7	\$5,137.50	\$5,137.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	BLATT, GAYLE M. (Partner)	\$1,150.00	\$895.00	55.8	\$64,170.00	\$49,941.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	CASEY, DAVID S., JR. (Partner)	\$1,100.00	\$895.00	10	\$11,000.00	\$8,950.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	CASEY, III, DAVE (Associate)	\$395.00	\$395.00	2.3	\$908.50	\$908.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	DAVIS, JAMES (Associate)	\$475.00	\$475.00	115.5	\$54,862.50	\$54,862.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	DAVIS, MICHELLE (Paralegal)	\$275.00	\$275.00	1	\$275.00	\$275.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	GUERRA, P. CAMILLE (Partner)	\$935.00	\$895.00	28.3	\$26,460.50	\$25,328.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	MCBAIN, CATHERINE (Associate)	\$505.00	\$505.00	102.7	\$51,863.50	\$51,863.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	RATAJESAK, VICKI (Paralegal)	\$235.00	\$235.00	2.8	\$658.00	\$658.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	ROBINSON, JEREMY (Partner)	\$950.00	\$895.00	49.2	\$46,740.00	\$44,034.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	SINNING, NANCY (Paralegal)	\$265.00	\$265.00	2	\$530.00	\$530.00
Dicello Levitt & Casey LLC	FERRI, DANIEL (Partner)	\$1,110.00	\$895.00	8.9	\$9,879.00	\$7,965.50
Dicello Levitt & Casey LLC	HAWAL, JUSTIN (Partner)	\$1,000.00	\$895.00	4.8	\$4,800.00	\$4,296.00
Dicello Levitt & Casey LLC	LEVITT, ADAM (Partner)	\$1,430.00	\$895.00	64.4	\$92,092.00	\$57,638.00
Dicello Levitt & Casey LLC	PROM, ADAM (Paralegal)	\$760.00	\$275.00	19.4	\$14,744.00	\$5,335.00
Dicello Levitt & Casey LLC	TANGREN, JOHN (Partner)	\$1,210.00	\$895.00	54.5	\$65,945.00	\$48,777.50
Dicello Levitt & Casey LLC	VESEER, JULIA (Paralegal)	\$400.00	\$275.00	12.9	\$5,160.00	\$3,547.50
Gibbs Law Group, LLP	BLOOMFIELD, JOSHUA (Of Counsel)	\$900.00	\$895.00	36.1	\$32,490.00	\$32,309.50
Gibbs Law Group, LLP	BLUMENTHAL, AARON (Associate)	\$605.00	\$600.00	2.8	\$1,694.00	\$1,680.00
Gibbs Law Group, LLP	GIBBS, ERIC (Partner)	\$1,065.00	\$895.00	3.8	\$4,047.00	\$3,401.00
Gibbs Law Group, LLP	HUGHES, DYLAN (Partner)	\$935.00	\$895.00	8.1	\$7,573.50	\$7,249.50
Gibbs Law Group, LLP	HUTCHINSON, PARKER (Of Counsel)	\$660.00	\$660.00	71.2	\$46,992.00	\$46,992.00
Gibbs Law Group, LLP	KOSBIE, JEFF (Associate)	\$605.00	\$600.00	52	\$31,460.00	\$31,200.00
Gibbs Law Group, LLP	LOPEZ, STEVE (Partner)	\$670.00	\$670.00	4.5	\$3,015.00	\$3,015.00
Gibbs Law Group, LLP	PROTHERO, ALYSSA (Staff Attorney)	\$415.00	\$415.00	159.5	\$66,192.50	\$66,192.50
Gibbs Law Group, LLP	RIVAS, ROSEMARY (Partner)	\$995.00	\$895.00	50.6	\$50,347.00	\$45,287.00
Gibbs Law Group, LLP	SOMINSKI, DASHA (Associate)	\$365.00	\$365.00	9.8	\$3,577.00	\$3,577.00
Gibbs Law Group, LLP	STEIN, DAVE (Partner)	\$815.00	\$815.00	1.6	\$1,304.00	\$1,304.00
Hellmuth & Johnson PLLC	CASHMAN, MICHAEL (Partner)	\$895.00	\$895.00	14.4	\$12,888.00	\$12,888.00
Hellmuth & Johnson PLLC	HAGSTROM, RICHARD (Partner)	\$980.00	\$895.00	35.8	\$35,084.00	\$32,041.00
Hellmuth & Johnson PLLC	KUHLMANN, NICHOLAS (Associate)	\$600.00	\$600.00	24.4	\$14,640.00	\$14,640.00
Hellmuth & Johnson PLLC	OTSUKA, GREGORY (Partner)	\$760.00	\$760.00	69	\$52,440.00	\$52,440.00
Keller Rohrbach L.L.P.	BORSETH, XANNIE (Paralegal)	\$300.00	\$275.00	18.4	\$5,520.00	\$5,060.00
Keller Rohrbach L.L.P.	BOWANKO, RACHEL (Paralegal)	\$320.00	\$275.00	60.5	\$19,360.00	\$16,637.50
Keller Rohrbach L.L.P.	CAPPIO, GRETCHEN (Partner)	\$1,265.00	\$895.00	32.1	\$40,606.50	\$28,729.50
Keller Rohrbach L.L.P.	DANIEL, ADELE (Associate)	\$650.00	\$600.00	118.7	\$77,155.00	\$71,220.00
Keller Rohrbach L.L.P.	DE VRIES, AJ (Paralegal)	\$425.00	\$275.00	15.3	\$6,502.50	\$4,207.50
Keller Rohrbach L.L.P.	EMERSON, ERIKA (Associate)	\$605.00	\$600.00	36.4	\$22,022.00	\$21,840.00
Keller Rohrbach L.L.P.	GOINS, MAX (Associate)	\$585.00	\$585.00	2.7	\$1,579.50	\$1,579.50
Keller Rohrbach L.L.P.	GUSSIN, ZACHARY (Associate)	\$625.00	\$600.00	140.3	\$87,687.50	\$84,180.00
Keller Rohrbach L.L.P.	MCDEVITT, RYAN (Partner)	\$935.00	\$895.00	345.2	\$322,762.00	\$308,954.00

Exhibit A - Summary of Hours and Lodestar Organized by Task Codes

Keller Rohrback L.L.P.	MERSING, JACOB (Paralegal)	\$460.00	\$275.00	80.4	\$36,984.00	\$22,110.00
Keller Rohrback L.L.P.	MISHLER, LARA (Paralegal)	\$330.00	\$275.00	4	\$1,320.00	\$1,100.00
Keller Rohrback L.L.P.	MOROWITZ, RACHEL (Associate)	\$525.00	\$525.00	220.7	\$115,867.50	\$115,867.50
Keller Rohrback L.L.P.	NEALIOUS, BIANCA (Paralegal)	\$335.00	\$275.00	6	\$2,010.00	\$1,650.00
Keller Rohrback L.L.P.	READ, SYDNEY (Associate)	\$510.00	\$510.00	41.8	\$21,318.00	\$21,318.00
Keller Rohrback L.L.P.	SPANGLER, BRIAN E. (Paralegal)	\$365.00	\$275.00	2.1	\$766.50	\$577.50
Keller Rohrback L.L.P.	TIEZAZU, Y. TIZZY (Paralegal)	\$305.00	\$275.00	0.2	\$61.00	\$55.00
Keller Rohrback L.L.P.	VERDUGO, GABE E. (Associate)	\$630.00	\$600.00	102	\$64,260.00	\$61,200.00
Keller Rohrback L.L.P.	WILSON, KIANA (Paralegal)	\$365.00	\$275.00	0.1	\$36.50	\$27.50
Keller Rohrback L.L.P.	WRIGHT, EMMA (Paralegal)	\$595.00	\$275.00	17.7	\$10,531.50	\$4,867.50
Kessler Topaz Meltzer & Check, LLP	ADAMS, SCOTT (Staff Attorney)	\$385.00	\$385.00	2.5	\$962.50	\$962.50
Kessler Topaz Meltzer & Check, LLP	AMJED, NAUMON (Partner)	\$970.00	\$895.00	1.4	\$1,358.00	\$1,253.00
Kessler Topaz Meltzer & Check, LLP	BELL, ADRIENNE (Associate)	\$575.00	\$575.00	8	\$4,600.00	\$4,600.00
Kessler Topaz Meltzer & Check, LLP	CORSON, MEGAN (Paralegal)	\$320.00	\$275.00	4.5	\$1,440.00	\$1,237.50
Kessler Topaz Meltzer & Check, LLP	ELANGOVAN, VARUN (Associate)	\$420.00	\$420.00	3	\$1,260.00	\$1,260.00
Kessler Topaz Meltzer & Check, LLP	GERTNER, ABIGAIL (Associate)	\$385.00	\$385.00	10.6	\$4,081.00	\$4,081.00
Kessler Topaz Meltzer & Check, LLP	HEMSLEY, COURTNEY (Paralegal)	\$405.00	\$275.00	133	\$53,865.00	\$36,575.00
Kessler Topaz Meltzer & Check, LLP	HERLING, BRANDON (Associate)	\$390.00	\$390.00	85.4	\$33,306.00	\$33,306.00
Kessler Topaz Meltzer & Check, LLP	HINDMARSH, LISA (Paralegal)	\$255.00	\$255.00	2.1	\$535.50	\$535.50
Kessler Topaz Meltzer & Check, LLP	JACOBSON, JORDAN (Associate)	\$560.00	\$560.00	25.2	\$14,112.00	\$14,112.00
Kessler Topaz Meltzer & Check, LLP	JULIANO, MAGGIE (Staff Attorney)	\$385.00	\$385.00	2.6	\$1,001.00	\$1,001.00
Kessler Topaz Meltzer & Check, LLP	LESSER, NATALIE (Associate)	\$535.00	\$535.00	205.8	\$110,103.00	\$110,103.00
Kessler Topaz Meltzer & Check, LLP	MCGINLEY, LAUREN (Associate)	\$480.00	\$480.00	81.6	\$39,168.00	\$39,168.00
Kessler Topaz Meltzer & Check, LLP	MELTZER, JOSEPH (Partner)	\$1,000.00	\$895.00	35.6	\$35,600.00	\$31,862.00
Kessler Topaz Meltzer & Check, LLP	PARK, ALEX (Associate)	\$480.00	\$480.00	8.8	\$4,224.00	\$4,224.00
Kessler Topaz Meltzer & Check, LLP	PEOPLES, ANDREW (Staff Attorney)	\$455.00	\$415.00	24.2	\$11,011.00	\$10,043.00
Kessler Topaz Meltzer & Check, LLP	PORT, LISA LAMB (Associate)	\$750.00	\$600.00	91.8	\$68,850.00	\$55,080.00
Kessler Topaz Meltzer & Check, LLP	RUSSO, LACEY (Paralegal)	\$260.00	\$260.00	0.8	\$208.00	\$208.00
Kessler Topaz Meltzer & Check, LLP	STARLING, TEDDY (Associate)	\$475.00	\$475.00	7.5	\$3,562.50	\$3,562.50
Kessler Topaz Meltzer & Check, LLP	TAMERIER, JULIE (Paralegal)	\$85.00	\$85.00	12.2	\$1,037.00	\$1,037.00
Kessler Topaz Meltzer & Check, LLP	TOPAZ, MARC (Partner)	\$1,000.00	\$895.00	6	\$6,000.00	\$5,370.00
Kessler Topaz Meltzer & Check, LLP	TROUTNER, MELISSA (Partner)	\$950.00	\$895.00	295.5	\$280,725.00	\$264,472.50
Kessler Topaz Meltzer & Check, LLP	WHITMAN, JOHNSTON (Partner)	\$950.00	\$895.00	18.3	\$17,385.00	\$16,378.50
Kessler Topaz Meltzer & Check, LLP	WOTRING, JULIE (Paralegal)	\$275.00	\$275.00	32	\$8,800.00	\$8,800.00
Levi & Korsinsky, LLP	KORSINSKY, EDUARD (Partner)	\$1,050.00	\$895.00	0.9	\$945.00	\$805.50
Levi & Korsinsky, LLP	MACCARONE, COURTNEY (Associate)	\$675.00	\$600.00	48.6	\$32,805.00	\$29,160.00
Levi & Korsinsky, LLP	MAH, ROSANNE (Partner)	\$740.00	\$740.00	112.7	\$83,398.00	\$83,398.00
Levi & Korsinsky, LLP	RIVAS, ROSEMARY (Partner)	\$995.00	\$895.00	93.2	\$92,734.00	\$83,414.00
Levi & Korsinsky, LLP	SCHMITT, CHRISTOPHER (Staff Attorney)	\$475.00	\$415.00	5.7	\$2,707.50	\$2,365.50
Lieff Cabraser Heimann & Bernstein, LLP	ARSOV, DUSHAN (Paralegal)	\$515.00	\$275.00	8.4	\$4,326.00	\$2,310.00
Lieff Cabraser Heimann & Bernstein, LLP	ATKINS, CECILIA (Paralegal)	\$360.00	\$275.00	1.1	\$396.00	\$302.50
Lieff Cabraser Heimann & Bernstein, LLP	BALKOSKI, JANE (Paralegal)	\$360.00	\$275.00	8.8	\$3,168.00	\$2,420.00
Lieff Cabraser Heimann & Bernstein, LLP	BELUSHKO BARROWS, NIKKI (Paralegal)	\$535.00	\$275.00	10.3	\$5,510.50	\$2,832.50
Lieff Cabraser Heimann & Bernstein, LLP	BERTRAM, ANNE (Paralegal)	\$360.00	\$275.00	103.3	\$37,188.00	\$28,407.50
Lieff Cabraser Heimann & Bernstein, LLP	BROWN, AIDAN (Paralegal)	\$525.00	\$275.00	82.5	\$43,312.50	\$22,687.50
Lieff Cabraser Heimann & Bernstein, LLP	BUDNER, KEVIN (Partner)	\$880.00	\$880.00	2.4	\$2,112.00	\$2,112.00
Lieff Cabraser Heimann & Bernstein, LLP	CHINN, VICTORIA (Staff Attorney)	\$655.00	\$415.00	16.8	\$11,004.00	\$6,972.00
Lieff Cabraser Heimann & Bernstein, LLP	DESAI, NIMISH (Partner)	\$1,115.00	\$895.00	21.6	\$24,084.00	\$19,332.00
Lieff Cabraser Heimann & Bernstein, LLP	EDEN, NICA (Paralegal)	\$480.00	\$275.00	1.4	\$672.00	\$385.00
Lieff Cabraser Heimann & Bernstein, LLP	KAWAMURA, JENNIFER (Paralegal)	\$540.00	\$275.00	19.2	\$10,368.00	\$5,280.00

Exhibit A - Summary of Hours and Lodestar Organized by Task Codes

Lieff Cabraser Heimann & Bernstein, LLP	KEENLEY, ELIZABETH (Paralegal)	\$540.00	\$275.00	1.4	\$756.00	\$385.00
Lieff Cabraser Heimann & Bernstein, LLP	KENFIELD-KELLEHER, MURIEL (Associate)	\$655.00	\$600.00	468	\$306,540.00	\$280,800.00
Lieff Cabraser Heimann & Bernstein, LLP	KRAVATZ, JILLIAN (Paralegal)	\$415.00	\$275.00	9	\$3,735.00	\$2,475.00
Lieff Cabraser Heimann & Bernstein, LLP	KRUGER, ERIK (Paralegal)	\$540.00	\$275.00	16.1	\$8,694.00	\$4,427.50
Lieff Cabraser Heimann & Bernstein, LLP	LICHTMAN, JASON (Partner)	\$1,080.00	\$895.00	1.4	\$1,512.00	\$1,253.00
Lieff Cabraser Heimann & Bernstein, LLP	LIM, TRACY (Paralegal)	\$465.00	\$275.00	6	\$2,790.00	\$1,650.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Associate)	\$820.00	\$600.00	950.5	\$779,410.00	\$570,300.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Partner)	\$820.00	\$820.00	436.4	\$357,848.00	\$357,848.00
Lieff Cabraser Heimann & Bernstein, LLP	MILORO, SCOTT (Staff Attorney)	\$655.00	\$415.00	22.9	\$14,999.50	\$9,503.50
Lieff Cabraser Heimann & Bernstein, LLP	MUKHERJI, RENEE (Paralegal)	\$565.00	\$275.00	0.9	\$508.50	\$247.50
Lieff Cabraser Heimann & Bernstein, LLP	NGUYEN, PHONG-CHAU (Partner)	\$880.00	\$880.00	455.7	\$401,016.00	\$401,016.00
Lieff Cabraser Heimann & Bernstein, LLP	NICOLAOU, JOHN (Partner)	\$880.00	\$880.00	2756.4	\$2,425,632.00	\$2,425,632.00
Lieff Cabraser Heimann & Bernstein, LLP	ORSLAND, KRISTIN (Paralegal)	\$540.00	\$275.00	14.3	\$7,722.00	\$3,932.50
Lieff Cabraser Heimann & Bernstein, LLP	RUDNICK, JENNIFER (Paralegal)	\$535.00	\$275.00	22.4	\$11,984.00	\$6,160.00
Lieff Cabraser Heimann & Bernstein, LLP	SABBE, JENNIFER (Paralegal)	\$565.00	\$275.00	1.6	\$904.00	\$440.00
Lieff Cabraser Heimann & Bernstein, LLP	SELHORST, HANNAH (Paralegal)	\$395.00	\$275.00	26.2	\$10,349.00	\$7,205.00
Lieff Cabraser Heimann & Bernstein, LLP	SIDDIQI, NABILA (Paralegal)	\$535.00	\$275.00	0.8	\$428.00	\$220.00
Lieff Cabraser Heimann & Bernstein, LLP	STELLINGS, DAVID (Partner)	\$1,440.00	\$895.00	222.2	\$319,968.00	\$198,869.00
Lieff Cabraser Heimann & Bernstein, LLP	TARPEH, JLE (Paralegal)	\$540.00	\$275.00	74.3	\$40,122.00	\$20,432.50
Lieff Cabraser Heimann & Bernstein, LLP	TEXIER, RICHARD (Paralegal)	\$540.00	\$275.00	4.8	\$2,592.00	\$1,320.00
Lieff Cabraser Heimann & Bernstein, LLP	TROUVAIS, BENJAMIN (Paralegal)	\$585.00	\$275.00	11.9	\$6,961.50	\$3,272.50
Lieff Cabraser Heimann & Bernstein, LLP	TROXEL, BRIAN (Paralegal)	\$540.00	\$275.00	30.1	\$16,254.00	\$8,277.50
Podhurst Orseck, P.A.	CLAVELO, TAILYN (Staff Attorney)	\$445.00	\$415.00	82.5	\$36,712.50	\$34,237.50
Podhurst Orseck, P.A.	DEL RIEGO, ALISSA (Associate)	\$655.00	\$600.00	93.6	\$61,308.00	\$56,160.00
Podhurst Orseck, P.A.	FERNANDEZ ANDES, CHRIS (Paralegal)	\$345.00	\$275.00	28.9	\$9,970.50	\$7,947.50
Podhurst Orseck, P.A.	GRAVANTE, JOHN (Partner)	\$755.00	\$755.00	101.4	\$76,557.00	\$76,557.00
Podhurst Orseck, P.A.	LEVY, NATHALIE (Staff Attorney)	\$590.00	\$415.00	81.2	\$47,908.00	\$33,698.00
Podhurst Orseck, P.A.	MARSTON, VICTORIA (Staff Attorney)	\$445.00	\$415.00	90	\$40,050.00	\$37,350.00
Podhurst Orseck, P.A.	PELL, STEPHANIE (Staff Attorney)	\$445.00	\$415.00	97.5	\$43,387.50	\$40,462.50
Podhurst Orseck, P.A.	PENELAS, CHRISTOPHER (Paralegal)	\$345.00	\$275.00	14.4	\$4,968.00	\$3,960.00
Podhurst Orseck, P.A.	PRIETO, PETER (Partner)	\$1,275.00	\$895.00	11.3	\$14,407.50	\$10,113.50
Podhurst Orseck, P.A.	RAFAELI, JOEY (Staff Attorney)	\$590.00	\$415.00	34.7	\$20,473.00	\$14,400.50
Podhurst Orseck, P.A.	SPULAK, MATT (Staff Attorney)	\$755.00	\$415.00	77	\$58,135.00	\$31,955.00
Podhurst Orseck, P.A.	WAHAB, CHAFIC (Staff Attorney)	\$590.00	\$415.00	120.2	\$70,918.00	\$49,883.00
Podhurst Orseck, P.A.	WEINSHALL, MATT (Partner)	\$755.00	\$755.00	96.9	\$73,159.50	\$73,159.50
Podhurst Orseck, P.A.	YARZABAL, ILIANA (Paralegal)	\$345.00	\$275.00	18	\$6,210.00	\$4,950.00
Pritzker Levine LLP	CARACUZZO, BETHANY (Partner)	\$950.00	\$895.00	29.5	\$28,025.00	\$26,402.50
Pritzker Levine LLP	CORBITT, CAROLINE (Associate)	\$725.00	\$600.00	8.4	\$6,090.00	\$5,040.00
Pritzker Levine LLP	HAGGARTY, HEATHER (Associate)	\$850.00	\$600.00	48	\$40,800.00	\$28,800.00
Pritzker Levine LLP	LEVINE, JONATHAN (Partner)	\$1,100.00	\$895.00	97.5	\$107,250.00	\$87,262.50
Pritzker Levine LLP	PRITZKER, ELIZABETH (Partner)	\$1,100.00	\$895.00	7.8	\$8,580.00	\$6,981.00
Pritzker Levine LLP	WHITNEY, ANNE (Associate)	\$700.00	\$600.00	14	\$9,800.00	\$8,400.00
Robbins Geller Rudman and Dowd LLP	ALPERSTEIN, JASON (Partner)	\$840.00	\$840.00	274.7	\$230,748.00	\$230,748.00
Robbins Geller Rudman and Dowd LLP	BEALL, BRADLEY (Associate)	\$515.00	\$515.00	554.3	\$285,464.50	\$285,464.50
Robbins Geller Rudman and Dowd LLP	BRITO, NICOLLE (Associate)	\$675.00	\$600.00	28.9	\$19,507.50	\$17,340.00
Robbins Geller Rudman and Dowd LLP	COHEN, ALEXANDER (Associate)	\$560.00	\$560.00	75.6	\$42,336.00	\$42,336.00
Robbins Geller Rudman and Dowd LLP	CURTISS, BROOKE (Staff Attorney)	\$440.00	\$415.00	1.1	\$484.00	\$456.50
Robbins Geller Rudman and Dowd LLP	DAVIDSON, STUART (Partner)	\$1,030.00	\$895.00	0.2	\$206.00	\$179.00
Robbins Geller Rudman and Dowd LLP	DEARMAN, MARK (Partner)	\$1,100.00	\$895.00	111.6	\$122,760.00	\$99,882.00
Robbins Geller Rudman and Dowd LLP	GELLER, PAUL (Partner)	\$1,375.00	\$895.00	9.4	\$12,925.00	\$8,413.00

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Robbins Geller Rudman and Dowd LLP	HANSON, KATINA (Paralegal)	\$410.00	\$275.00	85.1	\$34,891.00	\$23,402.50
Robbins Geller Rudman and Dowd LLP	JENSEN, RACHEL (Partner)	\$985.00	\$895.00	129.6	\$127,656.00	\$115,992.00
Robbins Geller Rudman and Dowd LLP	MARENCO, RICARDO (Associate)	\$540.00	\$540.00	140.5	\$75,870.00	\$75,870.00
Robbins Geller Rudman and Dowd LLP	PUERTO, PATRICIA (Paralegal)	\$410.00	\$275.00	10.5	\$4,305.00	\$2,887.50
Robbins Geller Rudman and Dowd LLP	SAWYER, MAXWELL (Associate)	\$475.00	\$475.00	323.9	\$153,852.50	\$153,852.50
Robbins Geller Rudman and Dowd LLP	SCIALPI, FACUNDO (Associate)	\$465.00	\$465.00	52.6	\$24,459.00	\$24,459.00
Robbins Geller Rudman and Dowd LLP	TACK, DEBORAH (Paralegal)	\$410.00	\$275.00	12.5	\$5,125.00	\$3,437.50
Robbins Geller Rudman and Dowd LLP	TAYLOR, LINDSEY (Partner)	\$1,200.00	\$895.00	22.3	\$26,760.00	\$19,958.50
Robins Kaplan, LLP	HURT, J. AUSTIN (Of Counsel)	\$1,050.00	\$895.00	581.6	\$610,680.00	\$520,532.00
Robins Kaplan, LLP	KOZEN, GEOFFREY H. (Associate)	\$990.00	\$600.00	171.2	\$169,488.00	\$102,720.00
Robins Kaplan, LLP	PACELLI, MICHAEL J. (Associate)	\$795.00	\$600.00	650.2	\$516,909.00	\$390,120.00
Robins Kaplan, LLP	POTTER, ANN M. (Paralegal)	\$410.00	\$275.00	20.6	\$8,446.00	\$5,665.00
Robins Kaplan, LLP	SLAUGHTER, STACEY P. (Partner)	\$1,280.00	\$895.00	323.6	\$414,208.00	\$289,622.00
Robins Kaplan, LLP	ZABEL, RICHARD R. (Paralegal)	\$930.00	\$275.00	3.7	\$3,441.00	\$1,017.50
Seeger Weiss LLP	AYERS, CHRISTOPHER (Partner)	\$1,075.00	\$895.00	26.3	\$28,272.50	\$23,538.50
Seeger Weiss LLP	KRAMER, LESLIE (Paralegal)	\$295.00	\$275.00	33.7	\$9,941.50	\$9,267.50
Total Task Category 6				22003.3	\$17,358,386.50	\$14,760,967.00
<i>Task Category 7: Court Appearances and Preparation</i>						
Firm	Timekeeper	Standard Hourly Rate	Reduced Hourly Rate	Hours	Standard Hourly Lodestar	Reduced Hourly Lodestar
Ahdoot & Wolfson	STINER, CHRISTOPHER (Partner)	\$975.00	\$895.00	14.8	\$14,430.00	\$13,246.00
Ahdoot & Wolfson	WOLFSON, TINA (Partner)	\$1,300.00	\$895.00	32.5	\$42,250.00	\$29,087.50
Baron & Budd, P.C.	BENAVIDEZ, ERNEST (Paralegal)	\$250.00	\$250.00	23	\$5,750.00	\$5,750.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Associate)	\$795.00	\$600.00	208.5	\$165,757.50	\$125,100.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Partner)	\$795.00	\$795.00	6	\$4,770.00	\$4,770.00
Baron & Budd, P.C.	MANN, JONAS (Associate)	\$600.00	\$600.00	1	\$600.00	\$600.00
Baron & Budd, P.C.	ROYSTER, SHANNON (Associate)	\$625.00	\$600.00	30.1	\$18,812.50	\$18,060.00
Baron & Budd, P.C.	SMILEY, ELIZABETH (Associate)	\$575.00	\$575.00	23.3	\$13,397.50	\$13,397.50
Baron & Budd, P.C.	TAMBURELLI, ADAM (Associate)	\$795.00	\$600.00	134.3	\$106,788.50	\$80,580.00
Baron & Budd, P.C.	TAMBURELLI, ADAM (Partner)	\$795.00	\$795.00	32.8	\$26,076.00	\$26,076.00
Baron & Budd, P.C.	TELLIS, ROLAND (Partner)	\$1,200.00	\$895.00	227.6	\$273,120.00	\$203,702.00
Beasley Allen Crow Methvin Portis & Miles, PC	BARNETT, CLAY (Partner)	\$1,100.00	\$895.00	4.5	\$4,950.00	\$4,027.50
Beasley Allen Crow Methvin Portis & Miles, PC	MARTIN, DYLAN (Associate)	\$550.00	\$550.00	1.2	\$660.00	\$660.00
Beasley Allen Crow Methvin Portis & Miles, PC	MILES, DEE (Partner)	\$1,100.00	\$895.00	53.8	\$59,180.00	\$48,151.00
Beasley Allen Crow Methvin Portis & Miles, PC	RUSSELL, BRENDA (Paralegal)	\$275.00	\$275.00	0.6	\$165.00	\$165.00
Beasley Allen Crow Methvin Portis & Miles, PC	WILLIAMS, MITCH (Associate)	\$650.00	\$600.00	5.6	\$3,640.00	\$3,360.00
Bleichmar Fonti & Auld LLP	DAVIS, ANNE (Partner)	\$995.00	\$895.00	1.3	\$1,293.50	\$1,163.50
Bleichmar Fonti & Auld LLP	ORNELAS, ANGELICA (Associate)	\$760.00	\$600.00	26.2	\$19,912.00	\$15,720.00
Bleichmar Fonti & Auld LLP	WEAVER, LESLEY (Partner)	\$1,310.00	\$895.00	13.3	\$17,423.00	\$11,903.50
Boies, Schiller & Flexner LLP	ULRICH, TYLER (Partner)	\$1,150.00	\$895.00	1.4	\$1,610.00	\$1,253.00
Boies, Schiller & Flexner LLP	WITTE, RYAN (Partner)	\$1,160.00	\$895.00	31.4	\$36,424.00	\$28,103.00
Boies, Schiller & Flexner LLP	ZACK, STEPHEN (Partner)	\$1,740.00	\$895.00	13.5	\$23,490.00	\$12,082.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	BLATT, GAYLE M. (Partner)	\$1,150.00	\$895.00	21	\$24,150.00	\$18,795.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	MCBAIN, CATHERINE (Associate)	\$505.00	\$505.00	0.7	\$353.50	\$353.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	ROBINSON, JEREMY (Partner)	\$950.00	\$895.00	2.4	\$2,280.00	\$2,148.00
Dicello Levitt & Casey LLC	FERRI, DANIEL (Partner)	\$1,110.00	\$895.00	4.3	\$4,773.00	\$3,848.50
Dicello Levitt & Casey LLC	LEVITT, ADAM (Partner)	\$1,430.00	\$895.00	36.2	\$51,766.00	\$32,399.00
Dicello Levitt & Casey LLC	PROM, ADAM (Paralegal)	\$760.00	\$275.00	2	\$1,520.00	\$550.00
Dicello Levitt & Casey LLC	TANGREN, JOHN (Partner)	\$1,210.00	\$895.00	8.5	\$10,285.00	\$7,607.50
Gibbs Law Group, LLP	GIBBONEY, KYLA (Associate)	\$605.00	\$600.00	2.6	\$1,573.00	\$1,560.00
Gibbs Law Group, LLP	RIVAS, ROSEMARY (Partner)	\$995.00	\$895.00	10.3	\$10,248.50	\$9,218.50

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Hellmuth & Johnson PLLC	CASHMAN, MICHAEL (Partner)	\$895.00	\$895.00	25.3	\$22,643.50	\$22,643.50
Hellmuth & Johnson PLLC	HAGSTROM, RICHARD (Partner)	\$980.00	\$895.00	3.2	\$3,136.00	\$2,864.00
Keller Rohrback L.L.P.	CAPPIO, GRETCHEN (Partner)	\$1,265.00	\$895.00	40.7	\$51,485.50	\$36,426.50
Keller Rohrback L.L.P.	MCDEVITT, RYAN (Partner)	\$935.00	\$895.00	37.1	\$34,688.50	\$33,204.50
Keller Rohrback L.L.P.	MERSING, JACOB (Paralegal)	\$460.00	\$275.00	3.5	\$1,610.00	\$962.50
Keller Rohrback L.L.P.	MOROWITZ, RACHEL (Associate)	\$525.00	\$525.00	32.8	\$17,220.00	\$17,220.00
Keller Rohrback L.L.P.	NEALIOUS, BIANCA (Paralegal)	\$335.00	\$275.00	2.2	\$737.00	\$605.00
Keller Rohrback L.L.P.	READ, SYDNEY (Associate)	\$510.00	\$510.00	4.5	\$2,295.00	\$2,295.00
Keller Rohrback L.L.P.	SPANGLER, BRIAN E. (Paralegal)	\$365.00	\$275.00	0.2	\$73.00	\$55.00
Keller Rohrback L.L.P.	TIEZAZU, Y. TIZZY (Paralegal)	\$305.00	\$275.00	0.2	\$61.00	\$55.00
Keller Rohrback L.L.P.	WRIGHT, EMMA (Paralegal)	\$595.00	\$275.00	0.8	\$476.00	\$220.00
Kessler Topaz Meltzer & Check, LLP	HEMSLEY, COURTNEY (Paralegal)	\$405.00	\$275.00	1	\$405.00	\$275.00
Kessler Topaz Meltzer & Check, LLP	MCGINLEY, LAUREN (Associate)	\$480.00	\$480.00	0.8	\$384.00	\$384.00
Kessler Topaz Meltzer & Check, LLP	MELTZER, JOSEPH (Partner)	\$1,000.00	\$895.00	25.1	\$25,100.00	\$22,464.50
Kessler Topaz Meltzer & Check, LLP	PORT, LISA LAMB (Associate)	\$750.00	\$600.00	1.9	\$1,425.00	\$1,140.00
Kessler Topaz Meltzer & Check, LLP	TROUTNER, MELISSA (Partner)	\$950.00	\$895.00	8.4	\$7,980.00	\$7,518.00
Levi & Korsinsky, LLP	LEVI, JOSEPH (Partner)	\$1,050.00	\$895.00	22.9	\$24,045.00	\$20,495.50
Levi & Korsinsky, LLP	RIVAS, ROSEMARY (Partner)	\$995.00	\$895.00	24.9	\$24,775.50	\$22,285.50
Lieff Cabraser Heimann & Bernstein, LLP	BALKOSKI, JANE (Paralegal)	\$360.00	\$275.00	6.1	\$2,196.00	\$1,677.50
Lieff Cabraser Heimann & Bernstein, LLP	BROWN, AIDAN (Paralegal)	\$525.00	\$275.00	17.9	\$9,397.50	\$4,922.50
Lieff Cabraser Heimann & Bernstein, LLP	DESAI, NIMISH (Partner)	\$1,115.00	\$895.00	0.7	\$780.50	\$626.50
Lieff Cabraser Heimann & Bernstein, LLP	KENFIELD-KELLEHER, MURIEL (Associate)	\$655.00	\$600.00	5.7	\$3,733.50	\$3,420.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Associate)	\$820.00	\$600.00	93.1	\$76,342.00	\$55,860.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Partner)	\$820.00	\$820.00	93.5	\$76,670.00	\$76,670.00
Lieff Cabraser Heimann & Bernstein, LLP	NGUYEN, PHONG-CHAU (Partner)	\$880.00	\$880.00	81.7	\$71,896.00	\$71,896.00
Lieff Cabraser Heimann & Bernstein, LLP	NICOLAOU, JOHN (Partner)	\$880.00	\$880.00	280.1	\$246,488.00	\$246,488.00
Lieff Cabraser Heimann & Bernstein, LLP	STELLINGS, DAVID (Partner)	\$1,440.00	\$895.00	301.4	\$434,016.00	\$269,753.00
Podhurst Orseck, P.A.	DEL RIEGO, ALISSA (Associate)	\$655.00	\$600.00	5.7	\$3,733.50	\$3,420.00
Podhurst Orseck, P.A.	GRAVANTE, JOHN (Partner)	\$755.00	\$755.00	3.5	\$2,642.50	\$2,642.50
Podhurst Orseck, P.A.	PRIETO, PETER (Partner)	\$1,275.00	\$895.00	2.7	\$3,442.50	\$2,416.50
Podhurst Orseck, P.A.	WEINSHALL, MATT (Partner)	\$755.00	\$755.00	2.7	\$2,038.50	\$2,038.50
Pritzker Levine LLP	LEVINE, JONATHAN (Partner)	\$1,100.00	\$895.00	32.8	\$36,080.00	\$29,356.00
Robbins Geller Rudman and Dowd LLP	ALPERSTEIN, JASON (Partner)	\$840.00	\$840.00	1	\$840.00	\$840.00
Robbins Geller Rudman and Dowd LLP	COHEN, ALEXANDER (Associate)	\$560.00	\$560.00	1.2	\$672.00	\$672.00
Robbins Geller Rudman and Dowd LLP	DEARMAN, MARK (Partner)	\$1,100.00	\$895.00	33.8	\$37,180.00	\$30,251.00
Robbins Geller Rudman and Dowd LLP	GELLER, PAUL (Partner)	\$1,375.00	\$895.00	0.1	\$137.50	\$89.50
Robbins Geller Rudman and Dowd LLP	HANSON, KATINA (Paralegal)	\$410.00	\$275.00	3.8	\$1,558.00	\$1,045.00
Robbins Geller Rudman and Dowd LLP	JENSEN, RACHEL (Partner)	\$985.00	\$895.00	6.7	\$6,599.50	\$5,996.50
Robbins Geller Rudman and Dowd LLP	MARENCO, RICARDO (Associate)	\$540.00	\$540.00	1	\$540.00	\$540.00
Robbins Geller Rudman and Dowd LLP	SAWYER, MAXWELL (Associate)	\$475.00	\$475.00	0.6	\$285.00	\$285.00
Robins Kaplan, LLP	HURT, J. AUSTIN (Of Counsel)	\$1,050.00	\$895.00	4.9	\$5,145.00	\$4,385.50
Robins Kaplan, LLP	HURT, J. AUSTIN (Partner)	\$1,050.00	\$895.00	0.5	\$525.00	\$447.50
Robins Kaplan, LLP	PACELLI, MICHAEL J. (Associate)	\$795.00	\$600.00	10	\$7,950.00	\$6,000.00
Robins Kaplan, LLP	SLAUGHTER, STACEY P. (Partner)	\$1,280.00	\$895.00	41.4	\$52,992.00	\$37,053.00
Total Task Category 7				2242.8	\$2,249,849.00	\$1,773,343.50
Task 8: Experts/Consultants						
Firm	Timekeeper	Standard Hourly Rate	Reduced Hourly Rate	Hours	Standard Hourly Lodestar	Reduced Hourly Lodestar
Ahdoot & Wolfson	WOLFSON, TINA (Partner)	\$1,300.00	\$895.00	3.9	\$5,070.00	\$3,490.50
Baron & Budd, P.C.	ALLEN, MOLLY GOZA (Staff Attorney)	\$415.00	\$415.00	462.7	\$192,020.50	\$192,020.50
Baron & Budd, P.C.	DOBBS, MICHAEL (Associate)	\$600.00	\$600.00	3.3	\$1,980.00	\$1,980.00

Exhibit A - Summary of Hours and Lodestar Organized by Task Codes

Baron & Budd, P.C.	FERNANDES, DAVID B. (Associate)	\$795.00	\$600.00	21.5	\$17,092.50	\$12,900.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Partner)	\$795.00	\$795.00	18.7	\$14,866.50	\$14,866.50
Baron & Budd, P.C.	FRANKLIN-ROBINSON, LAKENYA (Staff Attorney)	\$415.00	\$415.00	7.5	\$3,112.50	\$3,112.50
Baron & Budd, P.C.	HEILMAN, JOE (Staff Attorney)	\$415.00	\$415.00	320.5	\$133,007.50	\$133,007.50
Baron & Budd, P.C.	IRISH, JASON (Staff Attorney)	\$415.00	\$415.00	418.6	\$173,719.00	\$173,719.00
Baron & Budd, P.C.	LICHTER, JAY MICHAEL (Associate)	\$795.00	\$600.00	281	\$223,395.00	\$168,600.00
Baron & Budd, P.C.	LICHTER, JAY MICHAEL (Partner)	\$795.00	\$795.00	20.9	\$16,615.50	\$16,615.50
Baron & Budd, P.C.	LIPINSKI, JEFFREY (Staff Attorney)	\$415.00	\$415.00	1.3	\$539.50	\$539.50
Baron & Budd, P.C.	ROBELOT, RYAN A. (Staff Attorney)	\$415.00	\$415.00	558.7	\$231,860.50	\$231,860.50
Baron & Budd, P.C.	ROYSTER, SHANNON (Associate)	\$625.00	\$600.00	138.1	\$86,312.50	\$82,860.00
Baron & Budd, P.C.	SHAFFIN, ORI (Staff Attorney)	\$415.00	\$415.00	913.5	\$379,102.50	\$379,102.50
Baron & Budd, P.C.	TAMBURELLI, ADAM (Associate)	\$795.00	\$600.00	18.5	\$14,707.50	\$11,100.00
Baron & Budd, P.C.	TAMBURELLI, ADAM (Partner)	\$795.00	\$795.00	19.5	\$15,502.50	\$15,502.50
Baron & Budd, P.C.	TELLIS, ROLAND (Partner)	\$1,200.00	\$895.00	11.2	\$13,440.00	\$10,024.00
Beasley Allen Crow Methvin Portis & Miles, PC	MANN, TRENT (Associate)	\$550.00	\$550.00	0.8	\$440.00	\$440.00
Bleichmar Fonti & Auld LLP	ORNELAS, ANGELICA (Associate)	\$760.00	\$600.00	4.2	\$3,192.00	\$2,520.00
Bleichmar Fonti & Auld LLP	SUM, SYLVIA (Staff Attorney)	\$495.00	\$415.00	0.6	\$297.00	\$249.00
Bleichmar Fonti & Auld LLP	WEAVER, LESLEY (Partner)	\$1,310.00	\$895.00	7.2	\$9,432.00	\$6,444.00
Boies, Schiller & Flexner LLP	ULRICH, TYLER (Partner)	\$1,150.00	\$895.00	62.6	\$71,990.00	\$56,027.00
Boies, Schiller & Flexner LLP	WITTE, RYAN (Partner)	\$1,160.00	\$895.00	0.3	\$348.00	\$268.50
Boies, Schiller & Flexner LLP	ZACK, JASON (Of Counsel)	\$1,130.00	\$895.00	124.5	\$140,685.00	\$111,427.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	BARTLETT, CAROLINE (Partner)	\$875.00	\$875.00	1.2	\$1,050.00	\$1,050.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	BLATT, GAYLE M. (Partner)	\$1,150.00	\$895.00	2.7	\$3,105.00	\$2,416.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	DAVE, SANJEEV (Staff Attorney)	\$450.00	\$415.00	288.1	\$129,645.00	\$119,561.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	DAVIS, JAMES (Associate)	\$475.00	\$475.00	3.6	\$1,710.00	\$1,710.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	GUERRA, P. CAMILLE (Partner)	\$935.00	\$895.00	2	\$1,870.00	\$1,790.00
Jeffrey Lipinski	LIPINSKI, JEFFREY (Partner)	\$415.00	\$415.00	433.5	\$179,902.50	\$179,902.50
Keller Rohrbach L.L.P.	MCDEVITT, RYAN (Partner)	\$935.00	\$895.00	1	\$935.00	\$895.00
Keller Rohrbach L.L.P.	NEALIOUS, BIANCA (Paralegal)	\$335.00	\$275.00	0.3	\$100.50	\$82.50
Keller Rohrbach L.L.P.	SARKO, LYNN (Partner)	\$1,450.00	\$895.00	0.7	\$1,015.00	\$626.50
Kessler Topaz Meltzer & Check, LLP	HEMSLEY, COURTNEY (Paralegal)	\$405.00	\$275.00	1.3	\$526.50	\$357.50
Kessler Topaz Meltzer & Check, LLP	LESSER, NATALIE (Associate)	\$535.00	\$535.00	2.4	\$1,284.00	\$1,284.00
Kessler Topaz Meltzer & Check, LLP	MELTZER, JOSEPH (Partner)	\$1,000.00	\$895.00	1	\$1,000.00	\$895.00
Kessler Topaz Meltzer & Check, LLP	TROUTNER, MELISSA (Partner)	\$950.00	\$895.00	9.8	\$9,310.00	\$8,771.00
Lieff Cabraser Heimann & Bernstein, LLP	BELUSHKO BARROWS, NIKKI (Paralegal)	\$535.00	\$275.00	0.5	\$267.50	\$137.50
Lieff Cabraser Heimann & Bernstein, LLP	BERTRAM, ANNE (Paralegal)	\$360.00	\$275.00	0.3	\$108.00	\$82.50
Lieff Cabraser Heimann & Bernstein, LLP	CHINN, VICTORIA (Staff Attorney)	\$655.00	\$415.00	1.6	\$1,048.00	\$664.00
Lieff Cabraser Heimann & Bernstein, LLP	DESAI, NIMISH (Partner)	\$1,115.00	\$895.00	159.1	\$177,396.50	\$142,394.50
Lieff Cabraser Heimann & Bernstein, LLP	KENFIELD-KELLEHER, MURIEL (Associate)	\$655.00	\$600.00	3.2	\$2,096.00	\$1,920.00
Lieff Cabraser Heimann & Bernstein, LLP	LICHTMAN, JASON (Partner)	\$1,080.00	\$895.00	74.8	\$80,784.00	\$66,946.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Associate)	\$820.00	\$600.00	9.7	\$7,954.00	\$5,820.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Partner)	\$820.00	\$820.00	9.1	\$7,462.00	\$7,462.00
Lieff Cabraser Heimann & Bernstein, LLP	MILORO, SCOTT (Staff Attorney)	\$655.00	\$415.00	121.7	\$79,713.50	\$50,505.50
Lieff Cabraser Heimann & Bernstein, LLP	NGUYEN, PHONG-CHAU (Partner)	\$880.00	\$880.00	7.4	\$6,512.00	\$6,512.00
Lieff Cabraser Heimann & Bernstein, LLP	NICOLAOU, JOHN (Partner)	\$880.00	\$880.00	277.2	\$243,936.00	\$243,936.00
Lieff Cabraser Heimann & Bernstein, LLP	OH, MARISSA (Staff Attorney)	\$630.00	\$415.00	10.5	\$6,615.00	\$4,357.50
Lieff Cabraser Heimann & Bernstein, LLP	SIDDIQI, NABILA (Paralegal)	\$535.00	\$275.00	0.4	\$214.00	\$110.00
Lieff Cabraser Heimann & Bernstein, LLP	STELLINGS, DAVID (Partner)	\$1,440.00	\$895.00	18.8	\$27,072.00	\$16,826.00
Podhurst Orseck, P.A.	PELL, STEPHANIE (Staff Attorney)	\$445.00	\$415.00	50.9	\$22,650.50	\$21,123.50
Robbins Geller Rudman and Dowd LLP	COHEN, ALEXANDER (Associate)	\$560.00	\$560.00	55	\$30,800.00	\$30,800.00

Exhibit A - Summary of Hours and Lodestar Organized by Task Codes

Robbins Geller Rudman and Dowd LLP	DEARMAN, MARK (Partner)	\$1,100.00	\$895.00	16.7	\$18,370.00	\$14,946.50
Robbins Geller Rudman and Dowd LLP	JENSEN, RACHEL (Partner)	\$985.00	\$895.00	4.1	\$4,038.50	\$3,669.50
Robbins Geller Rudman and Dowd LLP	SCIALPI, FACUNDO (Associate)	\$465.00	\$465.00	1	\$465.00	\$465.00
Seeger Weiss LLP	AYERS, CHRISTOPHER (Partner)	\$1,075.00	\$895.00	4	\$4,300.00	\$3,580.00
Total Task Category 8				4993.2	\$2,801,984.00	\$2,570,277.00
<i>Task Category 9: Class Certification</i>						
Firm	Timekeeper	Standard Hourly Rate	Reduced Hourly Rate	Hours	Standard Hourly Lodestar	Reduced Hourly Lodestar
Total Task Category 9						
<i>Task Category 10: Trial & Preparation</i>						
Firm	Timekeeper	Standard Hourly Rate	Reduced Hourly Rate	Hours	Standard Hourly Lodestar	Reduced Hourly Lodestar
Total Task Category 10						
<i>Task Category 11: Appeal</i>						
Firm	Timekeeper	Standard Hourly Rate	Reduced Hourly Rate	Hours	Standard Hourly Lodestar	Reduced Hourly Lodestar
Ahdoot & Wolfson	KELSTON, HENRY (Partner)	\$1,100.00	\$895.00	2.4	\$2,640.00	\$2,148.00
Ahdoot & Wolfson	KING, BRADLEY (Partner)	\$900.00	\$895.00	0.2	\$180.00	\$179.00
Ahdoot & Wolfson	LORITSCH, WINDY (Paralegal)	\$350.00	\$275.00	0.8	\$280.00	\$220.00
Ahdoot & Wolfson	STINER, CHRISTOPHER (Partner)	\$975.00	\$895.00	6.1	\$5,947.50	\$5,459.50
Ahdoot & Wolfson	WOLFSON, TINA (Partner)	\$1,300.00	\$895.00	2.5	\$3,250.00	\$2,237.50
Baron & Budd, P.C.	DOBBS, MICHAEL (Associate)	\$600.00	\$600.00	0.1	\$60.00	\$60.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Partner)	\$795.00	\$795.00	17.7	\$14,071.50	\$14,071.50
Baron & Budd, P.C.	FISH, LISA (Associate)	\$600.00	\$600.00	14.7	\$8,820.00	\$8,820.00
Baron & Budd, P.C.	ROYSTER, SHANNON (Associate)	\$625.00	\$600.00	11.1	\$6,937.50	\$6,660.00
Baron & Budd, P.C.	TAMBURELLI, ADAM (Partner)	\$795.00	\$795.00	12.1	\$9,619.50	\$9,619.50
Baron & Budd, P.C.	TELLIS, ROLAND (Partner)	\$1,200.00	\$895.00	6.3	\$7,560.00	\$5,638.50
Lieff Cabraser Heimann & Bernstein, LLP	KENFIELD-KELLEHER, MURIEL (Associate)	\$655.00	\$600.00	0.5	\$327.50	\$300.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Partner)	\$820.00	\$820.00	55.6	\$45,592.00	\$45,592.00
Lieff Cabraser Heimann & Bernstein, LLP	NGUYEN, PHONG-CHAU (Partner)	\$880.00	\$880.00	36.6	\$32,208.00	\$32,208.00
Lieff Cabraser Heimann & Bernstein, LLP	TOLLAFIELD, STEPHEN (Paralegal)	\$540.00	\$275.00	2.2	\$1,188.00	\$605.00
Podhurst Orseck, P.A.	WEINSHALL, MATTHEW (Partner)	\$895.00	\$895.00	58	\$51,910.00	\$51,910.00
Total Task Category 11				226.9	\$190,591.50	\$185,728.50
<i>Task Category 12: Settlement</i>						
Firm	Timekeeper	Standard Hourly Rate	Reduced Hourly Rate	Hours	Standard Hourly Lodestar	Reduced Hourly Lodestar
Baron & Budd, P.C.	ALLEN, MOLLY GOZA (Staff Attorney)	\$415.00	\$415.00	3.5	\$1,452.50	\$1,452.50
Baron & Budd, P.C.	BENAVIDEZ, ERNEST (Paralegal)	\$250.00	\$250.00	25.2	\$6,300.00	\$6,300.00
Baron & Budd, P.C.	DOBBS, MICHAEL (Associate)	\$600.00	\$600.00	3.5	\$2,100.00	\$2,100.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Associate)	\$795.00	\$600.00	388.1	\$308,539.50	\$232,860.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Partner)	\$795.00	\$795.00	200.4	\$159,318.00	\$159,318.00
Baron & Budd, P.C.	LICHTER, JAY MICHAEL (Associate)	\$795.00	\$600.00	6.7	\$5,326.50	\$4,020.00
Baron & Budd, P.C.	ROYSTER, SHANNON (Associate)	\$625.00	\$600.00	156.3	\$97,687.50	\$93,780.00
Baron & Budd, P.C.	SHERMAN, ALEX (Staff Attorney)	\$415.00	\$415.00	15.3	\$6,349.50	\$6,349.50
Baron & Budd, P.C.	TAMBURELLI, ADAM (Associate)	\$795.00	\$600.00	196.5	\$156,217.50	\$117,900.00
Baron & Budd, P.C.	TAMBURELLI, ADAM (Partner)	\$795.00	\$795.00	85.6	\$68,052.00	\$68,052.00
Baron & Budd, P.C.	TELLIS, ROLAND (Partner)	\$1,200.00	\$895.00	299.2	\$359,040.00	\$267,784.00
Bleichmar Fonti & Auld LLP	GREEN, WILLIAM (Associate)	\$685.00	\$600.00	2	\$1,370.00	\$1,200.00
Bleichmar Fonti & Auld LLP	LAW, JULIE (Paralegal)	\$415.00	\$275.00	0.2	\$83.00	\$55.00
Bleichmar Fonti & Auld LLP	ORNELAS, ANGELICA (Associate)	\$760.00	\$600.00	0.1	\$76.00	\$60.00
Bleichmar Fonti & Auld LLP	SULLIVAN, KATHERINE (Staff Attorney)	\$580.00	\$415.00	0.2	\$116.00	\$83.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	BARTLETT, CAROLINE (Partner)	\$875.00	\$875.00	0.5	\$437.50	\$437.50

Exhibit A - Summary of Hours and Lodestar Organized by Task Codes

Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	STEELE, JORDAN (Associate)	\$600.00	\$600.00	1.1	\$660.00	\$660.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	BLATT, GAYLE M. (Partner)	\$1,150.00	\$895.00	1.1	\$1,265.00	\$984.50
Keller Rohrback L.L.P.	CAPPIO, GRETCHEN (Partner)	\$1,265.00	\$895.00	0.8	\$1,012.00	\$716.00
Keller Rohrback L.L.P.	MCDEVITT, RYAN (Partner)	\$935.00	\$895.00	2.3	\$2,150.50	\$2,058.50
Keller Rohrback L.L.P.	MERSING, JACOB (Paralegal)	\$460.00	\$275.00	3.4	\$1,564.00	\$935.00
Keller Rohrback L.L.P.	READ, SYDNEY (Associate)	\$510.00	\$510.00	1.1	\$561.00	\$561.00
Keller Rohrback L.L.P.	TIEZAZU, Y. TIZZY (Paralegal)	\$305.00	\$275.00	0.1	\$30.50	\$27.50
Keller Rohrback L.L.P.	VERDUGO, GABE E. (Associate)	\$630.00	\$600.00	0.2	\$126.00	\$120.00
Kessler Topaz Meltzer & Check, LLP	GRADEN, TYLER (Partner)	\$965.00	\$895.00	0.1	\$96.50	\$89.50
Kessler Topaz Meltzer & Check, LLP	LESSER, NATALIE (Associate)	\$535.00	\$535.00	0.3	\$160.50	\$160.50
Kessler Topaz Meltzer & Check, LLP	MARO, JAMES (Partner)	\$950.00	\$895.00	0.2	\$190.00	\$179.00
Kessler Topaz Meltzer & Check, LLP	PEOPLES, ANDREW (Associate)	\$455.00	\$455.00	0.5	\$227.50	\$227.50
Kessler Topaz Meltzer & Check, LLP	PORT, LISA LAMB (Associate)	\$750.00	\$600.00	5.2	\$3,900.00	\$3,120.00
Kessler Topaz Meltzer & Check, LLP	YEATES, MELISSA (Partner)	\$1,145.00	\$895.00	3.6	\$4,122.00	\$3,222.00
Lieff Cabraser Heimann & Bernstein, LLP	ARSOV, DUSHAN (Paralegal)	\$515.00	\$275.00	7.1	\$3,656.50	\$1,952.50
Lieff Cabraser Heimann & Bernstein, LLP	BROWN, AIDAN (Paralegal)	\$525.00	\$275.00	3.2	\$1,680.00	\$880.00
Lieff Cabraser Heimann & Bernstein, LLP	DESAI, NIMISH (Partner)	\$1,115.00	\$895.00	19.2	\$21,408.00	\$17,184.00
Lieff Cabraser Heimann & Bernstein, LLP	KENFIELD-KELLEHER, MURIEL (Associate)	\$655.00	\$600.00	34.9	\$22,859.50	\$20,940.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Associate)	\$820.00	\$600.00	35.7	\$29,274.00	\$21,420.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Partner)	\$820.00	\$820.00	371.9	\$304,958.00	\$304,958.00
Lieff Cabraser Heimann & Bernstein, LLP	NGUYEN, PHONG-CHAU (Partner)	\$880.00	\$880.00	348.9	\$307,032.00	\$307,032.00
Lieff Cabraser Heimann & Bernstein, LLP	NICOLAOU, JOHN (Partner)	\$880.00	\$880.00	113.1	\$99,528.00	\$99,528.00
Lieff Cabraser Heimann & Bernstein, LLP	RUDNICK, JENNIFER (Paralegal)	\$535.00	\$275.00	1.5	\$802.50	\$412.50
Lieff Cabraser Heimann & Bernstein, LLP	STELLINGS, DAVID (Partner)	\$1,440.00	\$895.00	572.8	\$824,832.00	\$512,656.00
Lieff Cabraser Heimann & Bernstein, LLP	TOLLAFIELD, STEPHEN (Paralegal)	\$540.00	\$275.00	2	\$1,080.00	\$550.00
Podhurst Orseck, P.A.	GRAVANTE, JOHN (Partner)	\$755.00	\$755.00	8	\$6,040.00	\$6,040.00
Podhurst Orseck, P.A.	PRIETO, PETER (Partner)	\$1,275.00	\$895.00	1.5	\$1,912.50	\$1,342.50
Podhurst Orseck, P.A.	WEINSHALL, MATT (Partner)	\$755.00	\$755.00	1.5	\$1,132.50	\$1,132.50
Podhurst Orseck, P.A.	YARZABAL, ILIANA (Paralegal)	\$345.00	\$275.00	3.6	\$1,242.00	\$990.00
Robbins Geller Rudman and Dowd LLP	BEALL, BRADLEY (Associate)	\$515.00	\$515.00	0.7	\$360.50	\$360.50
Robbins Geller Rudman and Dowd LLP	DEARMAN, MARK (Partner)	\$1,100.00	\$895.00	0.8	\$880.00	\$716.00
Robins Kaplan, LLP	HURT, J. AUSTIN (Partner)	\$1,050.00	\$895.00	3.3	\$3,465.00	\$2,953.50
Robins Kaplan, LLP	SLAUGHTER, STACEY P. (Partner)	\$1,280.00	\$895.00	1.3	\$1,664.00	\$1,163.50
Total Task Category 12				2934.3	\$2,822,338.00	\$2,277,024.00
<i>Task Category 13: Miscellaneous (describe)</i>						
Firm	Timekeeper	Standard Hourly Rate	Reduced Hourly Rate	Hours	Standard Hourly Lodestar	Reduced Hourly Lodestar
Total Task Category 13						
Grand Totals				123,711.50	\$78,265,905.00	\$64,739,461.50

EXHIBIT B

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper
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Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
Ahdoot & Wolfson	AHDOOT, ROBERT (Partner)	\$1,300.00	\$895.00	2 - Investigations and Factual Research	8.5	\$11,050.00	\$7,607.50
				3 - Case Management and Litigation Strategy	3.6	\$4,680.00	\$3,222.00
				6 - Pleadings, Briefs and Legal Research	5.2	\$6,760.00	\$4,654.00
					17.3	\$22,490.00	\$15,483.50
Ahdoot & Wolfson	BENSON, SAMANTHA (Paralegal)	\$250.00	\$250.00	3 - Case Management and Litigation Strategy	8.3	\$2,075.00	\$2,075.00
				4 - Discovery	0.4	\$100.00	\$100.00
					8.7	\$2,175.00	\$2,175.00
Ahdoot & Wolfson	BRASHEAR, AMBER (Paralegal)	\$250.00	\$250.00	3 - Case Management and Litigation Strategy	0.3	\$75.00	\$75.00
					0.3	\$75.00	\$75.00
Ahdoot & Wolfson	BUI, MICHELLE (Paralegal)	\$250.00	\$250.00	3 - Case Management and Litigation Strategy	1.1	\$275.00	\$275.00
				4 - Discovery	0.7	\$175.00	\$175.00
					1.8	\$450.00	\$450.00
Ahdoot & Wolfson	CABRERA, KATHRYN (Paralegal)	\$350.00	\$275.00	3 - Case Management and Litigation Strategy	0.5	\$175.00	\$137.50
				6 - Pleadings, Briefs and Legal Research	1.4	\$490.00	\$385.00
					1.9	\$665.00	\$522.50
Ahdoot & Wolfson	DEONNA, CHLOE (Associate)	\$550.00	\$415.00	5 - Document Review	767	\$421,850.00	\$318,305.00
					767	\$421,850.00	\$318,305.00
Ahdoot & Wolfson	DEONNA, CHLOE (Associate)	\$550.00	\$550.00	3 - Case Management and Litigation Strategy	22.9	\$12,595.00	\$12,595.00
				4 - Discovery	11	\$6,050.00	\$6,050.00
				6 - Pleadings, Briefs and Legal Research	37.8	\$20,790.00	\$20,790.00
					71.7	\$39,435.00	\$39,435.00
Ahdoot & Wolfson	DILEGGI, DAWN (Paralegal)	\$350.00	\$275.00	3 - Case Management and Litigation Strategy	4.7	\$1,645.00	\$1,292.50
					4.7	\$1,645.00	\$1,292.50
Ahdoot & Wolfson	EVERETT, JAKARAH (Associate)	\$550.00	\$415.00	5 - Document Review	34	\$18,700.00	\$14,110.00
					34	\$18,700.00	\$14,110.00
Ahdoot & Wolfson	EVERETT, JAKARAH (Associate)	\$550.00	\$550.00	6 - Pleadings, Briefs and Legal Research	13.4	\$7,370.00	\$7,370.00
					13.4	\$7,370.00	\$7,370.00
Ahdoot & Wolfson	FABIAN, JESSIELLE (Paralegal)	\$250.00	\$250.00	3 - Case Management and Litigation Strategy	3.9	\$975.00	\$975.00
					3.9	\$975.00	\$975.00
Ahdoot & Wolfson	GLEZAKOS, RUHANDY (Associate)	\$450.00	\$450.00	6 - Pleadings, Briefs and Legal Research	17.5	\$7,875.00	\$7,875.00
					17.5	\$7,875.00	\$7,875.00
Ahdoot & Wolfson	KELSTON, HENRY (Partner)	\$1,100.00	\$895.00	3 - Case Management and Litigation Strategy	0.4	\$440.00	\$358.00
				6 - Pleadings, Briefs and Legal Research	20.7	\$22,770.00	\$18,526.50
				11 - Appeal	2.4	\$2,640.00	\$2,148.00
					23.5	\$25,850.00	\$21,032.50
Ahdoot & Wolfson	KING, BRADLEY (Partner)	\$900.00	\$895.00	2 - Investigations and Factual Research	28	\$25,200.00	\$25,060.00
				3 - Case Management and Litigation Strategy	15.6	\$14,040.00	\$13,962.00
				4 - Discovery	0.4	\$360.00	\$358.00
				6 - Pleadings, Briefs and Legal Research	82.8	\$74,520.00	\$74,106.00
				11 - Appeal	0.2	\$180.00	\$179.00
					127	\$114,300.00	\$113,665.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper
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Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
Ahdoot & Wolfson	LIIVAMAGI, HEIDI (Paralegal)	\$350.00	\$275.00	3 - Case Management and Litigation Strategy	0.2	\$70.00	\$55.00
					0.2	\$70.00	\$55.00
Ahdoot & Wolfson	LORITSCH, WINDY (Paralegal)	\$350.00	\$275.00	3 - Case Management and Litigation Strategy	24.3	\$8,505.00	\$6,682.50
				4 - Discovery	0.6	\$210.00	\$165.00
				11 - Appeal	0.8	\$280.00	\$220.00
					25.7	\$8,995.00	\$7,067.50
Ahdoot & Wolfson	LOWE, LAURA (Associate)	\$350.00	\$350.00	3 - Case Management and Litigation Strategy	0.2	\$70.00	\$70.00
					0.2	\$70.00	\$70.00
Ahdoot & Wolfson	LOWE, LAURA (Paralegal)	\$350.00	\$275.00	3 - Case Management and Litigation Strategy	12.9	\$4,515.00	\$3,547.50
				4 - Discovery	1.2	\$420.00	\$330.00
					14.1	\$4,935.00	\$3,877.50
Ahdoot & Wolfson	MAYA, THEODORE (Partner)	\$1,100.00	\$895.00	2 - Investigations and Factual Research	10.1	\$11,110.00	\$9,039.50
				3 - Case Management and Litigation Strategy	1.1	\$1,210.00	\$984.50
				4 - Discovery	0.9	\$990.00	\$805.50
				6 - Pleadings, Briefs and Legal Research	10.6	\$11,660.00	\$9,487.00
					22.7	\$24,970.00	\$20,316.50
Ahdoot & Wolfson	MCAULEY, SEAN (Paralegal)	\$250.00	\$250.00	2 - Investigations and Factual Research	56.4	\$14,100.00	\$14,100.00
					56.4	\$14,100.00	\$14,100.00
Ahdoot & Wolfson	STINER, CHRISTOPHER (Partner)	\$975.00	\$415.00	5 - Document Review	0.7	\$682.50	\$290.50
					0.7	\$682.50	\$290.50
Ahdoot & Wolfson	STINER, CHRISTOPHER (Partner)	\$975.00	\$895.00	3 - Case Management and Litigation Strategy	37.4	\$36,465.00	\$33,473.00
				4 - Discovery	49.7	\$48,457.50	\$44,481.50
				6 - Pleadings, Briefs and Legal Research	132.4	\$129,090.00	\$118,498.00
				7 - Court Appearances and Preparation	14.8	\$14,430.00	\$13,246.00
				11 - Appeal	6.1	\$5,947.50	\$5,459.50
					240.4	\$234,390.00	\$215,158.00
Ahdoot & Wolfson	UNAL, SARPER (Associate)	\$625.00	\$415.00	5 - Document Review	660.8	\$413,000.00	\$274,232.00
					660.8	\$413,000.00	\$274,232.00
Ahdoot & Wolfson	UNAL, SARPER (Associate)	\$625.00	\$600.00	3 - Case Management and Litigation Strategy	4.6	\$2,875.00	\$2,760.00
				4 - Discovery	16.9	\$10,562.50	\$10,140.00
				6 - Pleadings, Briefs and Legal Research	11.3	\$7,062.50	\$6,780.00
					32.8	\$20,500.00	\$19,680.00
Ahdoot & Wolfson	WOLFSON, TINA (Partner)	\$1,300.00	\$415.00	5 - Document Review	0.3	\$390.00	\$124.50
					0.3	\$390.00	\$124.50
Ahdoot & Wolfson	WOLFSON, TINA (Partner)	\$1,300.00	\$895.00	2 - Investigations and Factual Research	43.6	\$56,680.00	\$39,022.00
				3 - Case Management and Litigation Strategy	29.8	\$38,740.00	\$26,671.00
				4 - Discovery	13.4	\$17,420.00	\$11,993.00
				6 - Pleadings, Briefs and Legal Research	73.1	\$95,030.00	\$65,424.50
				7 - Court Appearances and Preparation	32.5	\$42,250.00	\$29,087.50
				8 - Experts/Consultants	3.9	\$5,070.00	\$3,490.50
				11 - Appeal	2.5	\$3,250.00	\$2,237.50

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper
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Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
					198.8	\$258,440.00	\$177,926.00
Baron & Budd, P.C.	ALLEN, MOLLY GOZA (Staff Attorney)	\$415.00	\$415.00	3 - Case Management and Litigation Strategy	594.1	\$246,551.50	\$246,551.50
				4 - Discovery	397.3	\$164,879.50	\$164,879.50
				5 - Document Review	1916.5	\$795,347.50	\$795,347.50
				8 - Experts/Consultants	462.7	\$192,020.50	\$192,020.50
				12 - Settlement	3.5	\$1,452.50	\$1,452.50
					3374.1	\$1,400,251.50	\$1,400,251.50
Baron & Budd, P.C.	BAIRD, JOSEPH (Staff Attorney)	\$415.00	\$415.00	5 - Document Review	119.5	\$49,592.50	\$49,592.50
					119.5	\$49,592.50	\$49,592.50
Baron & Budd, P.C.	BENAVIDEZ, ERNEST (Paralegal)	\$250.00	\$250.00	1 - Lead Counsel Duties	147.2	\$36,800.00	\$36,800.00
				2 - Investigations and Factual Research	12.9	\$3,225.00	\$3,225.00
				3 - Case Management and Litigation Strategy	211.1	\$52,775.00	\$52,775.00
				5 - Document Review	65.9	\$16,475.00	\$16,475.00
				6 - Pleadings, Briefs and Legal Research	198	\$49,500.00	\$49,500.00
				7 - Court Appearances and Preparation	23	\$5,750.00	\$5,750.00
				12 - Settlement	25.2	\$6,300.00	\$6,300.00
					683.3	\$170,825.00	\$170,825.00
Baron & Budd, P.C.	BROWN, AARON (Staff Attorney)	\$415.00	\$415.00	5 - Document Review	191	\$79,265.00	\$79,265.00
				6 - Pleadings, Briefs and Legal Research	47	\$19,505.00	\$19,505.00
					238	\$98,770.00	\$98,770.00
Baron & Budd, P.C.	BROWN, ANGELA (Staff Attorney)	\$415.00	\$415.00	5 - Document Review	37.8	\$15,687.00	\$15,687.00
					37.8	\$15,687.00	\$15,687.00
Baron & Budd, P.C.	CLUFF, STERLING (Associate)	\$675.00	\$415.00	5 - Document Review	3.2	\$2,160.00	\$1,328.00
					3.2	\$2,160.00	\$1,328.00
Baron & Budd, P.C.	CLUFF, STERLING (Associate)	\$675.00	\$600.00	6 - Pleadings, Briefs and Legal Research	5.2	\$3,510.00	\$3,120.00
					5.2	\$3,510.00	\$3,120.00
Baron & Budd, P.C.	DARCHE, BENJAMIN (Staff Attorney)	\$415.00	\$415.00	3 - Case Management and Litigation Strategy	8	\$3,320.00	\$3,320.00
				5 - Document Review	216	\$89,640.00	\$89,640.00
					224	\$92,960.00	\$92,960.00
Baron & Budd, P.C.	DOBBS, MICHAEL (Associate)	\$600.00	\$415.00	5 - Document Review	0.2	\$120.00	\$83.00
					0.2	\$120.00	\$83.00
Baron & Budd, P.C.	DOBBS, MICHAEL (Associate)	\$600.00	\$600.00	3 - Case Management and Litigation Strategy	39.3	\$23,580.00	\$23,580.00
				4 - Discovery	117.2	\$70,320.00	\$70,320.00
				6 - Pleadings, Briefs and Legal Research	12.4	\$7,440.00	\$7,440.00
				8 - Experts/Consultants	3.3	\$1,980.00	\$1,980.00
				11 - Appeal	0.1	\$60.00	\$60.00
				12 - Settlement	3.5	\$2,100.00	\$2,100.00
					175.8	\$105,480.00	\$105,480.00
Baron & Budd, P.C.	ELLING, KELSEY (Associate)	\$600.00	\$600.00	3 - Case Management and Litigation Strategy	0.6	\$360.00	\$360.00
				4 - Discovery	1.1	\$660.00	\$660.00
				6 - Pleadings, Briefs and Legal Research	1.7	\$1,020.00	\$1,020.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
					3.4	\$2,040.00	\$2,040.00
Baron & Budd, P.C.	ENGLISH, LYNNZE (Staff Attorney)	\$415.00	\$415.00	3 - Case Management and Litigation Strategy	7.1	\$2,946.50	\$2,946.50
				4 - Discovery	1311.4	\$544,231.00	\$544,231.00
				5 - Document Review	251.7	\$104,455.50	\$104,455.50
					1570.2	\$651,633.00	\$651,633.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Associate)	\$795.00	\$415.00	5 - Document Review	279	\$221,805.00	\$115,785.00
					279	\$221,805.00	\$115,785.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Associate)	\$795.00	\$600.00	1 - Lead Counsel Duties	69.1	\$54,934.50	\$41,460.00
				2 - Investigations and Factual Research	28.4	\$22,578.00	\$17,040.00
				3 - Case Management and Litigation Strategy	999.3	\$794,443.50	\$599,580.00
				4 - Discovery	836.4	\$664,938.00	\$501,840.00
				6 - Pleadings, Briefs and Legal Research	1550.8	\$1,232,886.00	\$930,480.00
				7 - Court Appearances and Preparation	208.5	\$165,757.50	\$125,100.00
				8 - Experts/Consultants	21.5	\$17,092.50	\$12,900.00
				12 - Settlement	388.1	\$308,539.50	\$232,860.00
					4102.1	\$3,261,169.50	\$2,461,260.00
Baron & Budd, P.C.	FERNANDES, DAVID B. (Partner)	\$795.00	\$795.00	1 - Lead Counsel Duties	2.1	\$1,669.50	\$1,669.50
				3 - Case Management and Litigation Strategy	50.9	\$40,465.50	\$40,465.50
				4 - Discovery	111	\$88,245.00	\$88,245.00
				6 - Pleadings, Briefs and Legal Research	18.2	\$14,469.00	\$14,469.00
				7 - Court Appearances and Preparation	6	\$4,770.00	\$4,770.00
				8 - Experts/Consultants	18.7	\$14,866.50	\$14,866.50
				11 - Appeal	17.7	\$14,071.50	\$14,071.50
				12 - Settlement	200.4	\$159,318.00	\$159,318.00
					425	\$337,875.00	\$337,875.00
Baron & Budd, P.C.	FISH, LISA (Associate)	\$600.00	\$600.00	11 - Appeal	14.7	\$8,820.00	\$8,820.00
					14.7	\$8,820.00	\$8,820.00
Baron & Budd, P.C.	FRANKLIN-ROBINSON, LAKENYA (Staff Attorney)	\$415.00	\$415.00	3 - Case Management and Litigation Strategy	8	\$3,320.00	\$3,320.00
				4 - Discovery	52.5	\$21,787.50	\$21,787.50
				5 - Document Review	986	\$409,190.00	\$409,190.00
				8 - Experts/Consultants	7.5	\$3,112.50	\$3,112.50
					1054	\$437,410.00	\$437,410.00
Baron & Budd, P.C.	HANDT, JULIA (Staff Attorney)	\$415.00	\$415.00	3 - Case Management and Litigation Strategy	4.8	\$1,992.00	\$1,992.00
				4 - Discovery	239.2	\$99,268.00	\$99,268.00
				5 - Document Review	39.3	\$16,309.50	\$16,309.50
					283.3	\$117,569.50	\$117,569.50
Baron & Budd, P.C.	HEILMAN, JOE (Staff Attorney)	\$415.00	\$415.00	2 - Investigations and Factual Research	10.5	\$4,357.50	\$4,357.50
				3 - Case Management and Litigation Strategy	143.6	\$59,594.00	\$59,594.00
				4 - Discovery	11.8	\$4,897.00	\$4,897.00
				5 - Document Review	796.5	\$330,547.50	\$330,547.50
				8 - Experts/Consultants	320.5	\$133,007.50	\$133,007.50

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper
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Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
					1282.9	\$532,403.50	\$532,403.50
Baron & Budd, P.C.	IRISH, JASON (Staff Attorney)	\$415.00	\$415.00	3 - Case Management and Litigation Strategy	11.4	\$4,731.00	\$4,731.00
				5 - Document Review	45	\$18,675.00	\$18,675.00
				8 - Experts/Consultants	418.6	\$173,719.00	\$173,719.00
					475	\$197,125.00	\$197,125.00
Baron & Budd, P.C.	KENT, JOSEPH (Staff Attorney)	\$415.00	\$415.00	4 - Discovery	16	\$6,640.00	\$6,640.00
				5 - Document Review	1089	\$451,935.00	\$451,935.00
					1105	\$458,575.00	\$458,575.00
Baron & Budd, P.C.	KORFF, LYDIA (Staff Attorney)	\$415.00	\$415.00	5 - Document Review	120.8	\$50,132.00	\$50,132.00
					120.8	\$50,132.00	\$50,132.00
Baron & Budd, P.C.	LAWSON, MELANIE (Staff Attorney)	\$415.00	\$415.00	5 - Document Review	184.7	\$76,650.50	\$76,650.50
					184.7	\$76,650.50	\$76,650.50
Baron & Budd, P.C.	LEVINE, HARRISON M. (Staff Attorney)	\$415.00	\$415.00	3 - Case Management and Litigation Strategy	1	\$415.00	\$415.00
				4 - Discovery	1	\$415.00	\$415.00
				5 - Document Review	210.1	\$87,191.50	\$87,191.50
					212.1	\$88,021.50	\$88,021.50
Baron & Budd, P.C.	LICHTER, JAY MICHAEL (Associate)	\$795.00	\$415.00	5 - Document Review	7.6	\$6,042.00	\$3,154.00
					7.6	\$6,042.00	\$3,154.00
Baron & Budd, P.C.	LICHTER, JAY MICHAEL (Associate)	\$795.00	\$600.00	2 - Investigations and Factual Research	22.7	\$18,046.50	\$13,620.00
				3 - Case Management and Litigation Strategy	65.3	\$51,913.50	\$39,180.00
				4 - Discovery	29.4	\$23,373.00	\$17,640.00
				6 - Pleadings, Briefs and Legal Research	3.5	\$2,782.50	\$2,100.00
				8 - Experts/Consultants	281	\$223,395.00	\$168,600.00
				12 - Settlement	6.7	\$5,326.50	\$4,020.00
					408.6	\$324,837.00	\$245,160.00
Baron & Budd, P.C.	LICHTER, JAY MICHAEL (Partner)	\$795.00	\$795.00	8 - Experts/Consultants	20.9	\$16,615.50	\$16,615.50
					20.9	\$16,615.50	\$16,615.50
Baron & Budd, P.C.	LIPINSKI, JEFFREY (Staff Attorney)	\$415.00	\$415.00	3 - Case Management and Litigation Strategy	3.8	\$1,577.00	\$1,577.00
				4 - Discovery	2.8	\$1,162.00	\$1,162.00
				5 - Document Review	869.9	\$361,008.50	\$361,008.50
				8 - Experts/Consultants	1.3	\$539.50	\$539.50
					877.8	\$364,287.00	\$364,287.00
Baron & Budd, P.C.	MANN, JONAS (Associate)	\$600.00	\$415.00	5 - Document Review	17	\$10,200.00	\$7,055.00
					17	\$10,200.00	\$7,055.00
Baron & Budd, P.C.	MANN, JONAS (Associate)	\$600.00	\$600.00	2 - Investigations and Factual Research	40.7	\$24,420.00	\$24,420.00
				3 - Case Management and Litigation Strategy	89.3	\$53,580.00	\$53,580.00
				4 - Discovery	88.4	\$53,040.00	\$53,040.00
				6 - Pleadings, Briefs and Legal Research	125.2	\$75,120.00	\$75,120.00
				7 - Court Appearances and Preparation	1	\$600.00	\$600.00
					344.6	\$206,760.00	\$206,760.00
Baron & Budd, P.C.	MCDONALD, PAUL (Staff Attorney)	\$415.00	\$415.00	5 - Document Review	304	\$126,160.00	\$126,160.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
					304	\$126,160.00	\$126,160.00
Baron & Budd, P.C.	MILLER, ISAAC (Associate)	\$600.00	\$600.00	3 - Case Management and Litigation Strategy	48	\$28,800.00	\$28,800.00
				4 - Discovery	167.7	\$100,620.00	\$100,620.00
					215.7	\$129,420.00	\$129,420.00
Baron & Budd, P.C.	MUTOMBO, MONIQUE (Staff Attorney)	\$415.00	\$415.00	3 - Case Management and Litigation Strategy	21.2	\$8,798.00	\$8,798.00
				4 - Discovery	642.1	\$266,471.50	\$266,471.50
				5 - Document Review	1022	\$424,130.00	\$424,130.00
					1685.3	\$699,399.50	\$699,399.50
Baron & Budd, P.C.	NEAL, RAVYN (Staff Attorney)	\$415.00	\$415.00	3 - Case Management and Litigation Strategy	8	\$3,320.00	\$3,320.00
				5 - Document Review	1928.2	\$800,203.00	\$800,203.00
					1936.2	\$803,523.00	\$803,523.00
Baron & Budd, P.C.	NIEBERGALL, CATHERINE (Staff Attorney)	\$415.00	\$415.00	3 - Case Management and Litigation Strategy	3.7	\$1,535.50	\$1,535.50
					3.7	\$1,535.50	\$1,535.50
Baron & Budd, P.C.	OEFFNER, JESSICA (Staff Attorney)	\$415.00	\$415.00	3 - Case Management and Litigation Strategy	117.3	\$48,679.50	\$48,679.50
				4 - Discovery	104.1	\$43,201.50	\$43,201.50
				5 - Document Review	236	\$97,940.00	\$97,940.00
					457.4	\$189,821.00	\$189,821.00
Baron & Budd, P.C.	OETTINGER, DANIEL (Staff Attorney)	\$415.00	\$415.00	5 - Document Review	824	\$341,960.00	\$341,960.00
				6 - Pleadings, Briefs and Legal Research	8	\$3,320.00	\$3,320.00
					832	\$345,280.00	\$345,280.00
Baron & Budd, P.C.	PACELLI, MICHAEL (Associate)	\$600.00	\$600.00	3 - Case Management and Litigation Strategy	1.1	\$660.00	\$660.00
				4 - Discovery	34.7	\$20,820.00	\$20,820.00
				6 - Pleadings, Briefs and Legal Research	4.1	\$2,460.00	\$2,460.00
					39.9	\$23,940.00	\$23,940.00
Baron & Budd, P.C.	PERSAND, VIVIAN (Staff Attorney)	\$415.00	\$415.00	5 - Document Review	375.3	\$155,749.50	\$155,749.50
					375.3	\$155,749.50	\$155,749.50
Baron & Budd, P.C.	PETTY, TAYLOR (Staff Attorney)	\$415.00	\$415.00	3 - Case Management and Litigation Strategy	1	\$415.00	\$415.00
				4 - Discovery	1	\$415.00	\$415.00
				5 - Document Review	122.3	\$50,754.50	\$50,754.50
					124.3	\$51,584.50	\$51,584.50
Baron & Budd, P.C.	RABESS, CLEMENT (Staff Attorney)	\$415.00	\$415.00	5 - Document Review	3592	\$1,490,680.00	\$1,490,680.00
				6 - Pleadings, Briefs and Legal Research	32	\$13,280.00	\$13,280.00
					3624	\$1,503,960.00	\$1,503,960.00
Baron & Budd, P.C.	ROBELOT, RYAN A, (Staff Attorney)	\$415.00	\$415.00	2 - Investigations and Factual Research	113.4	\$47,061.00	\$47,061.00
				3 - Case Management and Litigation Strategy	33.3	\$13,819.50	\$13,819.50
				4 - Discovery	80.2	\$33,283.00	\$33,283.00
				5 - Document Review	335.3	\$139,149.50	\$139,149.50
				8 - Experts/Consultants	558.7	\$231,860.50	\$231,860.50
					1120.9	\$465,173.50	\$465,173.50
Baron & Budd, P.C.	ROYSTER, SHANNON (Associate)	\$625.00	\$415.00	5 - Document Review	129.3	\$80,812.50	\$53,659.50
					129.3	\$80,812.50	\$53,659.50

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
Baron & Budd, P.C.	ROYSTER, SHANNON (Associate)	\$625.00	\$600.00	1 - Lead Counsel Duties	25.1	\$15,687.50	\$15,060.00
				2 - Investigations and Factual Research	5.5	\$3,437.50	\$3,300.00
				3 - Case Management and Litigation Strategy	149.5	\$93,437.50	\$89,700.00
				4 - Discovery	956.8	\$598,000.00	\$574,080.00
				6 - Pleadings, Briefs and Legal Research	641	\$400,625.00	\$384,600.00
				7 - Court Appearances and Preparation	30.1	\$18,812.50	\$18,060.00
				8 - Experts/Consultants	138.1	\$86,312.50	\$82,860.00
				11 - Appeal	11.1	\$6,937.50	\$6,660.00
				12 - Settlement	156.3	\$97,687.50	\$93,780.00
					2113.5	\$1,320,937.50	\$1,268,100.00
Baron & Budd, P.C.	SALAZAR, ERIKA (Staff Attorney)	\$415.00	\$415.00	5 - Document Review	296	\$122,840.00	\$122,840.00
					296	\$122,840.00	\$122,840.00
Baron & Budd, P.C.	SHAFFIN, ORI (Staff Attorney)	\$415.00	\$415.00	3 - Case Management and Litigation Strategy	45.6	\$18,924.00	\$18,924.00
				4 - Discovery	155	\$64,325.00	\$64,325.00
				5 - Document Review	2535.2	\$1,052,108.00	\$1,052,108.00
				8 - Experts/Consultants	913.5	\$379,102.50	\$379,102.50
					3649.3	\$1,514,459.50	\$1,514,459.50
Baron & Budd, P.C.	SHERMAN, ALEX (Staff Attorney)	\$415.00	\$415.00	12 - Settlement	15.3	\$6,349.50	\$6,349.50
					15.3	\$6,349.50	\$6,349.50
Baron & Budd, P.C.	SMILEY, ELIZABETH (Associate)	\$575.00	\$415.00	5 - Document Review	4.1	\$2,357.50	\$1,701.50
					4.1	\$2,357.50	\$1,701.50
Baron & Budd, P.C.	SMILEY, ELIZABETH (Associate)	\$575.00	\$575.00	1 - Lead Counsel Duties	0.3	\$172.50	\$172.50
				3 - Case Management and Litigation Strategy	2.6	\$1,495.00	\$1,495.00
				4 - Discovery	15	\$8,625.00	\$8,625.00
				6 - Pleadings, Briefs and Legal Research	156.5	\$89,987.50	\$89,987.50
				7 - Court Appearances and Preparation	23.3	\$13,397.50	\$13,397.50
					197.7	\$113,677.50	\$113,677.50
Baron & Budd, P.C.	SON, DAVID (Staff Attorney)	\$415.00	\$415.00	5 - Document Review	1168	\$484,720.00	\$484,720.00
					1168	\$484,720.00	\$484,720.00
Baron & Budd, P.C.	TAMBURELLI, ADAM (Associate)	\$795.00	\$415.00	5 - Document Review	229.1	\$182,134.50	\$95,076.50
					229.1	\$182,134.50	\$95,076.50
Baron & Budd, P.C.	TAMBURELLI, ADAM (Associate)	\$795.00	\$600.00	1 - Lead Counsel Duties	66.9	\$53,185.50	\$40,140.00
				2 - Investigations and Factual Research	15.1	\$12,004.50	\$9,060.00
				3 - Case Management and Litigation Strategy	918.8	\$730,446.00	\$551,280.00
				4 - Discovery	1053.7	\$837,691.50	\$632,220.00
				6 - Pleadings, Briefs and Legal Research	2159.1	\$1,716,484.50	\$1,295,460.00
				7 - Court Appearances and Preparation	134.3	\$106,768.50	\$80,580.00
				8 - Experts/Consultants	18.5	\$14,707.50	\$11,100.00
				12 - Settlement	196.5	\$156,217.50	\$117,900.00
					4562.9	\$3,627,505.50	\$2,737,740.00
Baron & Budd, P.C.	TAMBURELLI, ADAM (Partner)	\$795.00	\$795.00	1 - Lead Counsel Duties	0.2	\$159.00	\$159.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
				3 - Case Management and Litigation Strategy	44.7	\$35,536.50	\$35,536.50
				4 - Discovery	132.9	\$105,655.50	\$105,655.50
				6 - Pleadings, Briefs and Legal Research	10.4	\$8,268.00	\$8,268.00
				7 - Court Appearances and Preparation	32.8	\$26,076.00	\$26,076.00
				8 - Experts/Consultants	19.5	\$15,502.50	\$15,502.50
				11 - Appeal	12.1	\$9,619.50	\$9,619.50
				12 - Settlement	85.6	\$68,052.00	\$68,052.00
					338.2	\$268,869.00	\$268,869.00
Baron & Budd, P.C.	TELLIS, ROLAND (Partner)	\$1,200.00	\$415.00	5 - Document Review	20.1	\$24,120.00	\$8,341.50
					20.1	\$24,120.00	\$8,341.50
Baron & Budd, P.C.	TELLIS, ROLAND (Partner)	\$1,200.00	\$895.00	1 - Lead Counsel Duties	1.5	\$1,800.00	\$1,342.50
				2 - Investigations and Factual Research	13	\$15,600.00	\$11,635.00
				3 - Case Management and Litigation Strategy	115.7	\$138,840.00	\$103,551.50
				4 - Discovery	164.5	\$197,400.00	\$147,227.50
				6 - Pleadings, Briefs and Legal Research	320.8	\$384,960.00	\$287,116.00
				7 - Court Appearances and Preparation	227.6	\$273,120.00	\$203,702.00
				8 - Experts/Consultants	11.2	\$13,440.00	\$10,024.00
				11 - Appeal	6.3	\$7,560.00	\$5,638.50
				12 - Settlement	299.2	\$359,040.00	\$267,784.00
					1159.8	\$1,391,760.00	\$1,038,021.00
Baron & Budd, P.C.	TURNER, MEGHAN (Staff Attorney)	\$415.00	\$415.00	5 - Document Review	224	\$92,960.00	\$92,960.00
					224	\$92,960.00	\$92,960.00
Baron & Budd, P.C.	YI, KIMBERLY (Staff Attorney)	\$415.00	\$415.00	5 - Document Review	304	\$126,160.00	\$126,160.00
					304	\$126,160.00	\$126,160.00
Beasley Allen Crow Methvin Portis & Miles, PC	BALDWIN, CHRIS (Staff Attorney)	\$350.00	\$350.00	3 - Case Management and Litigation Strategy	0.7	\$245.00	\$245.00
				6 - Pleadings, Briefs and Legal Research	17.5	\$6,125.00	\$6,125.00
					18.2	\$6,370.00	\$6,370.00
Beasley Allen Crow Methvin Portis & Miles, PC	BARNETT, CLAY (Partner)	\$1,100.00	\$895.00	2 - Investigations and Factual Research	4.9	\$5,390.00	\$4,385.50
				3 - Case Management and Litigation Strategy	52.4	\$57,640.00	\$46,898.00
				4 - Discovery	19	\$20,900.00	\$17,005.00
				6 - Pleadings, Briefs and Legal Research	103.8	\$114,180.00	\$92,901.00
				7 - Court Appearances and Preparation	4.5	\$4,950.00	\$4,027.50
					184.6	\$203,060.00	\$165,217.00
Beasley Allen Crow Methvin Portis & Miles, PC	BOYD, RACHEL (Associate)	\$750.00	\$600.00	6 - Pleadings, Briefs and Legal Research	10.3	\$7,725.00	\$6,180.00
					10.3	\$7,725.00	\$6,180.00
Beasley Allen Crow Methvin Portis & Miles, PC	MANN, TRENT (Associate)	\$550.00	\$415.00	5 - Document Review	440.4	\$242,220.00	\$182,766.00
					440.4	\$242,220.00	\$182,766.00
Beasley Allen Crow Methvin Portis & Miles, PC	MANN, TRENT (Associate)	\$550.00	\$550.00	4 - Discovery	10.4	\$5,720.00	\$5,720.00
				8 - Experts/Consultants	0.8	\$440.00	\$440.00
					11.2	\$6,160.00	\$6,160.00
Beasley Allen Crow Methvin Portis & Miles, PC	MANN, TRENT (Paralegal)	\$550.00	\$275.00	4 - Discovery	2.4	\$1,320.00	\$660.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
					2.4	\$1,320.00	\$660.00
Beasley Allen Crow Methvin Portis & Miles, PC	MARTIN, DYLAN (Associate)	\$550.00	\$550.00	3 - Case Management and Litigation Strategy	0.4	\$220.00	\$220.00
				4 - Discovery	30.9	\$16,995.00	\$16,995.00
				6 - Pleadings, Briefs and Legal Research	3.3	\$1,815.00	\$1,815.00
				7 - Court Appearances and Preparation	1.2	\$660.00	\$660.00
					35.8	\$19,690.00	\$19,690.00
Beasley Allen Crow Methvin Portis & Miles, PC	MILES, DEE (Partner)	\$1,100.00	\$895.00	2 - Investigations and Factual Research	3.3	\$3,630.00	\$2,953.50
				3 - Case Management and Litigation Strategy	67.9	\$74,690.00	\$60,770.50
				4 - Discovery	5.8	\$6,380.00	\$5,191.00
				6 - Pleadings, Briefs and Legal Research	137.7	\$151,470.00	\$123,241.50
				7 - Court Appearances and Preparation	53.8	\$59,180.00	\$48,151.00
					268.5	\$295,350.00	\$240,307.50
Beasley Allen Crow Methvin Portis & Miles, PC	RUSSELL, BRENDA (Paralegal)	\$275.00	\$275.00	2 - Investigations and Factual Research	5	\$1,375.00	\$1,375.00
				3 - Case Management and Litigation Strategy	144.7	\$39,792.50	\$39,792.50
				4 - Discovery	15.7	\$4,317.50	\$4,317.50
				6 - Pleadings, Briefs and Legal Research	18.8	\$5,170.00	\$5,170.00
				7 - Court Appearances and Preparation	0.6	\$165.00	\$165.00
					184.8	\$50,820.00	\$50,820.00
Beasley Allen Crow Methvin Portis & Miles, PC	WILLIAMS, MITCH (Associate)	\$650.00	\$600.00	3 - Case Management and Litigation Strategy	13.5	\$8,775.00	\$8,100.00
				4 - Discovery	18.9	\$12,285.00	\$11,340.00
				6 - Pleadings, Briefs and Legal Research	73.2	\$47,580.00	\$43,920.00
				7 - Court Appearances and Preparation	5.6	\$3,640.00	\$3,360.00
					111.2	\$72,280.00	\$66,720.00
Beasley Allen Crow Methvin Portis & Miles, PC	WYNN, JONATHAN ()	\$415.00	\$415.00	5 - Document Review	216.1	\$89,681.50	\$89,681.50
					216.1	\$89,681.50	\$89,681.50
Beasley Allen Crow Methvin Portis & Miles, PC	WYNN, JONATHAN (Staff Attorney)	\$415.00	\$415.00	5 - Document Review	68.6	\$28,469.00	\$28,469.00
					68.6	\$28,469.00	\$28,469.00
Bleichmar Fonti & Auld LLP	BERTERO, ANTHONY (Staff Attorney)	\$450.00	\$415.00	3 - Case Management and Litigation Strategy	8	\$3,600.00	\$3,320.00
				6 - Pleadings, Briefs and Legal Research	2.5	\$1,125.00	\$1,037.50
					10.5	\$4,725.00	\$4,357.50
Bleichmar Fonti & Auld LLP	DAVIS, ANNE (Partner)	\$995.00	\$895.00	2 - Investigations and Factual Research	0.9	\$895.50	\$805.50
				3 - Case Management and Litigation Strategy	11.5	\$11,442.50	\$10,292.50
				4 - Discovery	13.5	\$13,432.50	\$12,082.50
				6 - Pleadings, Briefs and Legal Research	38.1	\$37,909.50	\$34,099.50
				7 - Court Appearances and Preparation	1.3	\$1,293.50	\$1,163.50
					65.3	\$64,973.50	\$58,443.50
Bleichmar Fonti & Auld LLP	GREEN, WILLIAM (Associate)	\$685.00	\$600.00	12 - Settlement	2	\$1,370.00	\$1,200.00
					2	\$1,370.00	\$1,200.00
Bleichmar Fonti & Auld LLP	KOO, JOOYOUNG (Staff Attorney)	\$575.00	\$415.00	2 - Investigations and Factual Research	8	\$4,600.00	\$3,320.00
				3 - Case Management and Litigation Strategy	12.7	\$7,302.50	\$5,270.50
				4 - Discovery	734	\$422,050.00	\$304,610.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
				5 - Document Review	911.7	\$524,227.50	\$378,355.50
				6 - Pleadings, Briefs and Legal Research	59.6	\$34,270.00	\$24,734.00
					1726	\$992,450.00	\$716,290.00
Bleichmar Fonti & Auld LLP	LAW, JULIE (Paralegal)	\$415.00	\$275.00	3 - Case Management and Litigation Strategy	0.5	\$207.50	\$137.50
				4 - Discovery	0.7	\$290.50	\$192.50
				6 - Pleadings, Briefs and Legal Research	0.4	\$166.00	\$110.00
				12 - Settlement	0.2	\$83.00	\$55.00
					1.8	\$747.00	\$495.00
Bleichmar Fonti & Auld LLP	MULLENS, GREGORY (Of Counsel)	\$940.00	\$895.00	3 - Case Management and Litigation Strategy	0.2	\$188.00	\$179.00
				4 - Discovery	0.7	\$658.00	\$628.50
					0.9	\$846.00	\$805.50
Bleichmar Fonti & Auld LLP	ORNELAS, ANGELICA (Associate)	\$760.00	\$415.00	5 - Document Review	0.1	\$76.00	\$41.50
					0.1	\$76.00	\$41.50
Bleichmar Fonti & Auld LLP	ORNELAS, ANGELICA (Associate)	\$760.00	\$600.00	2 - Investigations and Factual Research	2.5	\$1,900.00	\$1,500.00
				3 - Case Management and Litigation Strategy	10.2	\$7,752.00	\$6,120.00
				4 - Discovery	10.5	\$7,980.00	\$6,300.00
				6 - Pleadings, Briefs and Legal Research	115	\$87,400.00	\$69,000.00
				7 - Court Appearances and Preparation	26.2	\$19,912.00	\$15,720.00
				8 - Experts/Consultants	4.2	\$3,192.00	\$2,520.00
				12 - Settlement	0.1	\$76.00	\$60.00
					168.7	\$128,212.00	\$101,220.00
Bleichmar Fonti & Auld LLP	ROBERTSON, KELSEY (Staff Attorney)	\$350.00	\$350.00	3 - Case Management and Litigation Strategy	3.5	\$1,225.00	\$1,225.00
				6 - Pleadings, Briefs and Legal Research	2.7	\$945.00	\$945.00
					6.2	\$2,170.00	\$2,170.00
Bleichmar Fonti & Auld LLP	SAMRA, JOSHUA (Associate)	\$795.00	\$600.00	2 - Investigations and Factual Research	3.4	\$2,703.00	\$2,040.00
				3 - Case Management and Litigation Strategy	12	\$9,540.00	\$7,200.00
				4 - Discovery	0.5	\$397.50	\$300.00
				6 - Pleadings, Briefs and Legal Research	12	\$9,540.00	\$7,200.00
					27.9	\$22,180.50	\$16,740.00
Bleichmar Fonti & Auld LLP	SIMNOWITZ, SARA (Associate)	\$940.00	\$600.00	3 - Case Management and Litigation Strategy	2.6	\$2,444.00	\$1,560.00
				6 - Pleadings, Briefs and Legal Research	1.3	\$1,222.00	\$780.00
					3.9	\$3,666.00	\$2,340.00
Bleichmar Fonti & Auld LLP	SULLIVAN, KASEY (Staff Attorney)	\$580.00	\$415.00	2 - Investigations and Factual Research	11.4	\$6,612.00	\$4,731.00
				3 - Case Management and Litigation Strategy	4.9	\$2,842.00	\$2,033.50
				4 - Discovery	1.3	\$754.00	\$539.50
				6 - Pleadings, Briefs and Legal Research	9	\$5,220.00	\$3,735.00
					26.6	\$15,428.00	\$11,039.00
Bleichmar Fonti & Auld LLP	SULLIVAN, KATHERINE (Staff Attorney)	\$580.00	\$415.00	12 - Settlement	0.2	\$116.00	\$83.00
					0.2	\$116.00	\$83.00
Bleichmar Fonti & Auld LLP	SUM, SYLVIA (Staff Attorney)	\$495.00	\$415.00	2 - Investigations and Factual Research	10	\$4,950.00	\$4,150.00
				3 - Case Management and Litigation Strategy	16.5	\$8,167.50	\$6,847.50

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper
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Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
				4 - Discovery	1739.7	\$861,151.50	\$721,975.50
				5 - Document Review	1389.7	\$687,901.50	\$576,725.50
				6 - Pleadings, Briefs and Legal Research	16.2	\$8,019.00	\$6,723.00
				8 - Experts/Consultants	0.6	\$297.00	\$249.00
					3172.7	\$1,570,486.50	\$1,316,670.50
Bleichmar Fonti & Auld LLP	TAMONDONG, CESAR (Paralegal)	\$350.00	\$275.00	6 - Pleadings, Briefs and Legal Research	3.9	\$1,365.00	\$1,072.50
					3.9	\$1,365.00	\$1,072.50
Bleichmar Fonti & Auld LLP	TSURUDOME, GLEN (Staff Attorney)	\$520.00	\$415.00	4 - Discovery	8	\$4,160.00	\$3,320.00
				6 - Pleadings, Briefs and Legal Research	43.5	\$22,620.00	\$18,052.50
					51.5	\$26,780.00	\$21,372.50
Bleichmar Fonti & Auld LLP	WEAVER, LESLEY (Partner)	\$1,310.00	\$895.00	2 - Investigations and Factual Research	1.1	\$1,441.00	\$984.50
				3 - Case Management and Litigation Strategy	50.6	\$66,286.00	\$45,287.00
				4 - Discovery	9.4	\$12,314.00	\$8,413.00
				6 - Pleadings, Briefs and Legal Research	33.2	\$43,492.00	\$29,714.00
				7 - Court Appearances and Preparation	13.3	\$17,423.00	\$11,903.50
				8 - Experts/Consultants	7.2	\$9,432.00	\$6,444.00
					114.8	\$150,388.00	\$102,746.00
Boies, Schiller & Flexner LLP	BEATON, MARCOS (Of Counsel)	\$790.00	\$790.00	3 - Case Management and Litigation Strategy	92.7	\$73,233.00	\$73,233.00
				6 - Pleadings, Briefs and Legal Research	121.7	\$96,143.00	\$96,143.00
					214.4	\$169,376.00	\$169,376.00
Boies, Schiller & Flexner LLP	BUTTERWORTH, BRANDON (Associate)	\$740.00	\$600.00	3 - Case Management and Litigation Strategy	6.5	\$4,810.00	\$3,900.00
				4 - Discovery	7	\$5,180.00	\$4,200.00
				6 - Pleadings, Briefs and Legal Research	262.9	\$194,546.00	\$157,740.00
					276.4	\$204,536.00	\$165,840.00
Boies, Schiller & Flexner LLP	GARCILZAO, GABRIELA (Paralegal)	\$390.00	\$275.00	4 - Discovery	3.4	\$1,326.00	\$935.00
					3.4	\$1,326.00	\$935.00
Boies, Schiller & Flexner LLP	HARRISON, LASELVE (Associate)	\$740.00	\$600.00	6 - Pleadings, Briefs and Legal Research	181.9	\$134,606.00	\$109,140.00
					181.9	\$134,606.00	\$109,140.00
Boies, Schiller & Flexner LLP	LICATA, SAMANTHA (Associate)	\$670.00	\$600.00	3 - Case Management and Litigation Strategy	4.4	\$2,948.00	\$2,640.00
				6 - Pleadings, Briefs and Legal Research	149.6	\$100,232.00	\$89,760.00
					154	\$103,180.00	\$92,400.00
Boies, Schiller & Flexner LLP	MARTIN, RACHEL (Associate)	\$710.00	\$600.00	3 - Case Management and Litigation Strategy	21.8	\$15,478.00	\$13,080.00
					21.8	\$15,478.00	\$13,080.00
Boies, Schiller & Flexner LLP	MIKULIC, MICHAEL (Associate)	\$740.00	\$600.00	3 - Case Management and Litigation Strategy	6.8	\$5,032.00	\$4,080.00
				6 - Pleadings, Briefs and Legal Research	72.5	\$53,650.00	\$43,500.00
					79.3	\$58,682.00	\$47,580.00
Boies, Schiller & Flexner LLP	SCHIFMAN, JARED (Associate)	\$450.00	\$450.00	6 - Pleadings, Briefs and Legal Research	9.5	\$4,275.00	\$4,275.00
					9.5	\$4,275.00	\$4,275.00
Boies, Schiller & Flexner LLP	ULRICH, TYLER (Partner)	\$1,150.00	\$415.00	5 - Document Review	18.9	\$21,735.00	\$7,843.50
					18.9	\$21,735.00	\$7,843.50
Boies, Schiller & Flexner LLP	ULRICH, TYLER (Partner)	\$1,150.00	\$895.00	2 - Investigations and Factual Research	11.1	\$12,765.00	\$9,934.50

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
				3 - Case Management and Litigation Strategy	84.8	\$97,520.00	\$75,896.00
				4 - Discovery	14.2	\$16,330.00	\$12,709.00
				6 - Pleadings, Briefs and Legal Research	78.4	\$90,160.00	\$70,168.00
				7 - Court Appearances and Preparation	1.4	\$1,610.00	\$1,253.00
				8 - Experts/Consultants	62.6	\$71,990.00	\$56,027.00
					252.5	\$290,375.00	\$225,987.50
Boies, Schiller & Flexner LLP	VOEGELE, JONATHAN (Associate)	\$770.00	\$600.00	6 - Pleadings, Briefs and Legal Research	45	\$34,650.00	\$27,000.00
					45	\$34,650.00	\$27,000.00
Boies, Schiller & Flexner LLP	WITTE, RYAN (Partner)	\$1,160.00	\$415.00	5 - Document Review	1.9	\$2,204.00	\$788.50
					1.9	\$2,204.00	\$788.50
Boies, Schiller & Flexner LLP	WITTE, RYAN (Partner)	\$1,160.00	\$895.00	2 - Investigations and Factual Research	3.7	\$4,292.00	\$3,311.50
				3 - Case Management and Litigation Strategy	99.1	\$114,956.00	\$88,694.50
				4 - Discovery	31	\$35,960.00	\$27,745.00
				6 - Pleadings, Briefs and Legal Research	224.8	\$260,768.00	\$201,196.00
				7 - Court Appearances and Preparation	31.4	\$36,424.00	\$28,103.00
				8 - Experts/Consultants	0.3	\$348.00	\$268.50
					390.3	\$452,748.00	\$349,318.50
Boies, Schiller & Flexner LLP	ZACK, JASON (Of Counsel)	\$1,130.00	\$895.00	3 - Case Management and Litigation Strategy	0.4	\$452.00	\$358.00
				4 - Discovery	12.7	\$14,351.00	\$11,366.50
				8 - Experts/Consultants	124.5	\$140,685.00	\$111,427.50
					137.6	\$155,488.00	\$123,152.00
Boies, Schiller & Flexner LLP	ZACK, STEPHEN (Partner)	\$1,740.00	\$895.00	2 - Investigations and Factual Research	1.1	\$1,914.00	\$984.50
				3 - Case Management and Litigation Strategy	91.3	\$158,862.00	\$81,713.50
				4 - Discovery	13.3	\$23,142.00	\$11,903.50
				6 - Pleadings, Briefs and Legal Research	152.2	\$264,828.00	\$136,219.00
				7 - Court Appearances and Preparation	13.5	\$23,490.00	\$12,082.50
					271.4	\$472,236.00	\$242,903.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	BARTLETT, CAROLINE (Partner)	\$875.00	\$415.00	5 - Document Review	10.2	\$8,925.00	\$4,233.00
					10.2	\$8,925.00	\$4,233.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	BARTLETT, CAROLINE (Partner)	\$875.00	\$875.00	2 - Investigations and Factual Research	55.7	\$48,737.50	\$48,737.50
				3 - Case Management and Litigation Strategy	15.4	\$13,475.00	\$13,475.00
				4 - Discovery	14.4	\$12,600.00	\$12,600.00
				8 - Experts/Consultants	1.2	\$1,050.00	\$1,050.00
				12 - Settlement	0.5	\$437.50	\$437.50
					87.2	\$76,300.00	\$76,300.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	BOWER, ZACH (Partner)	\$875.00	\$415.00	5 - Document Review	4.5	\$3,937.50	\$1,867.50
					4.5	\$3,937.50	\$1,867.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	BOWER, ZACH (Partner)	\$875.00	\$875.00	3 - Case Management and Litigation Strategy	0.5	\$437.50	\$437.50
					0.5	\$437.50	\$437.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	CARABALLO, LUIS (Paralegal)	\$225.00	\$225.00	2 - Investigations and Factual Research	40.4	\$9,090.00	\$9,090.00
				3 - Case Management and Litigation Strategy	70	\$15,750.00	\$15,750.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper
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Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
					110.4	\$24,840.00	\$24,840.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	CECCHI, JAMES (Partner)	\$1,000.00	\$895.00	3 - Case Management and Litigation Strategy	3	\$3,000.00	\$2,685.00
				4 - Discovery	3.5	\$3,500.00	\$3,132.50
					6.5	\$6,500.00	\$5,817.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	ECKLUND, DONALD (Partner)	\$900.00	\$895.00	2 - Investigations and Factual Research	1	\$900.00	\$895.00
				3 - Case Management and Litigation Strategy	5.5	\$4,950.00	\$4,922.50
					6.5	\$5,850.00	\$5,817.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	FALDUTO, JEFF (Paralegal)	\$225.00	\$225.00	2 - Investigations and Factual Research	2.2	\$495.00	\$495.00
				3 - Case Management and Litigation Strategy	2.1	\$472.50	\$472.50
				4 - Discovery	3.2	\$720.00	\$720.00
				5 - Document Review	4.3	\$967.50	\$967.50
					11.8	\$2,655.00	\$2,655.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	HASSAN, NAJMA (Paralegal)	\$125.00	\$125.00	5 - Document Review	34.8	\$4,350.00	\$4,350.00
					34.8	\$4,350.00	\$4,350.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	INNES, MICHAEL (Partner)	\$750.00	\$750.00	3 - Case Management and Litigation Strategy	0.6	\$450.00	\$450.00
					0.6	\$450.00	\$450.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	LETTIRE, IAN (Paralegal)	\$225.00	\$225.00	5 - Document Review	9.3	\$2,092.50	\$2,092.50
					9.3	\$2,092.50	\$2,092.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	MAKHAIL, MARK (Associate)	\$600.00	\$600.00	2 - Investigations and Factual Research	1.1	\$660.00	\$660.00
				3 - Case Management and Litigation Strategy	5.6	\$3,360.00	\$3,360.00
				4 - Discovery	32.1	\$19,260.00	\$19,260.00
					38.8	\$23,280.00	\$23,280.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	MANORY, WILLIAM (Associate)	\$550.00	\$415.00	5 - Document Review	1.4	\$770.00	\$581.00
					1.4	\$770.00	\$581.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	MANORY, WILLIAM (Associate)	\$550.00	\$550.00	3 - Case Management and Litigation Strategy	5	\$2,750.00	\$2,750.00
				4 - Discovery	5.5	\$3,025.00	\$3,025.00
					10.5	\$5,775.00	\$5,775.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	MANORY, WILLIAM (Paralegal)	\$550.00	\$275.00	3 - Case Management and Litigation Strategy	2.2	\$1,210.00	\$605.00
				4 - Discovery	11	\$6,050.00	\$3,025.00
				5 - Document Review	7	\$3,850.00	\$1,925.00
					20.2	\$11,110.00	\$5,555.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	MCPHERSON, KEN (Paralegal)	\$225.00	\$225.00	4 - Discovery	8.2	\$1,845.00	\$1,845.00
					8.2	\$1,845.00	\$1,845.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	PATEL, ANTRA (Paralegal)	\$125.00	\$125.00	5 - Document Review	47.5	\$5,937.50	\$5,937.50
					47.5	\$5,937.50	\$5,937.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	RAGO, MARY ELLEN (Paralegal)	\$225.00	\$225.00	3 - Case Management and Litigation Strategy	0.9	\$202.50	\$202.50
				4 - Discovery	0.6	\$135.00	\$135.00
				5 - Document Review	0.3	\$67.50	\$67.50
					1.8	\$405.00	\$405.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	STEELE, JORDAN (Associate)	\$600.00	\$415.00	5 - Document Review	5.5	\$3,300.00	\$2,282.50
					5.5	\$3,300.00	\$2,282.50

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	STEELE, JORDAN (Associate)	\$600.00	\$600.00	2 - Investigations and Factual Research	15	\$9,000.00	\$9,000.00
				3 - Case Management and Litigation Strategy	33.8	\$20,280.00	\$20,280.00
				4 - Discovery	88.3	\$52,980.00	\$52,980.00
				6 - Pleadings, Briefs and Legal Research	1.2	\$720.00	\$720.00
				12 - Settlement	1.1	\$660.00	\$660.00
					139.4	\$83,640.00	\$83,640.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	TAYLOR, LINDSEY (Partner)	\$1,200.00	\$895.00	4 - Discovery	0.5	\$600.00	\$447.50
					0.5	\$600.00	\$447.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	TEMPTESTA, LAURA (Paralegal)	\$225.00	\$225.00	2 - Investigations and Factual Research	3.6	\$810.00	\$810.00
				3 - Case Management and Litigation Strategy	37.7	\$8,482.50	\$8,482.50
				5 - Document Review	12.8	\$2,880.00	\$2,880.00
					54.1	\$12,172.50	\$12,172.50
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	TYSON, STEVEN (Associate)	\$550.00	\$415.00	5 - Document Review	20.2	\$11,110.00	\$8,383.00
					20.2	\$11,110.00	\$8,383.00
Carella Byrne Cecchi Olstein Brody & Agnello, P.C.	TYSON, STEVEN (Associate)	\$550.00	\$550.00	3 - Case Management and Litigation Strategy	2.7	\$1,485.00	\$1,485.00
					2.7	\$1,485.00	\$1,485.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	BARRON, SETH (Associate)	\$375.00	\$375.00	2 - Investigations and Factual Research	3.1	\$1,162.50	\$1,162.50
				3 - Case Management and Litigation Strategy	4.6	\$1,725.00	\$1,725.00
				6 - Pleadings, Briefs and Legal Research	13.7	\$5,137.50	\$5,137.50
					21.4	\$8,025.00	\$8,025.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	BLATT, GAYLE M. (Partner)	\$1,150.00	\$415.00	5 - Document Review	0.2	\$230.00	\$83.00
					0.2	\$230.00	\$83.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	BLATT, GAYLE M. (Partner)	\$1,150.00	\$895.00	2 - Investigations and Factual Research	0.3	\$345.00	\$268.50
				3 - Case Management and Litigation Strategy	57.7	\$66,355.00	\$51,641.50
				4 - Discovery	11	\$12,650.00	\$9,845.00
				6 - Pleadings, Briefs and Legal Research	55.8	\$64,170.00	\$49,941.00
				7 - Court Appearances and Preparation	21	\$24,150.00	\$18,795.00
				8 - Experts/Consultants	2.7	\$3,105.00	\$2,416.50
				12 - Settlement	1.1	\$1,265.00	\$984.50
	149.6	\$172,040.00	\$133,892.00				
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	CASEY, DAVID S., JR. (Partner)	\$1,100.00	\$895.00	2 - Investigations and Factual Research	0.3	\$330.00	\$268.50
				3 - Case Management and Litigation Strategy	8.9	\$9,790.00	\$7,965.50
				6 - Pleadings, Briefs and Legal Research	10	\$11,000.00	\$8,950.00
					19.2	\$21,120.00	\$17,184.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	CASEY, III, DAVE (Associate)	\$395.00	\$395.00	3 - Case Management and Litigation Strategy	3.3	\$1,303.50	\$1,303.50
				6 - Pleadings, Briefs and Legal Research	2.3	\$908.50	\$908.50
					5.6	\$2,212.00	\$2,212.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	DAVE, SANJEEV (Staff Attorney)	\$450.00	\$415.00	2 - Investigations and Factual Research	7.7	\$3,465.00	\$3,195.50
				4 - Discovery	5.5	\$2,475.00	\$2,282.50
				5 - Document Review	2775.3	\$1,248,885.00	\$1,151,749.50
				8 - Experts/Consultants	288.1	\$129,645.00	\$119,561.50

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper
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Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
					3076.6	\$1,384,470.00	\$1,276,789.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	DAVIS, JAMES (Associate)	\$475.00	\$475.00	2 - Investigations and Factual Research	1.6	\$760.00	\$760.00
				3 - Case Management and Litigation Strategy	53.3	\$25,317.50	\$25,317.50
				4 - Discovery	0.5	\$237.50	\$237.50
				6 - Pleadings, Briefs and Legal Research	115.5	\$54,862.50	\$54,862.50
				8 - Experts/Consultants	3.6	\$1,710.00	\$1,710.00
					174.5	\$82,887.50	\$82,887.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	DAVIS, MICHELLE (Paralegal)	\$275.00	\$275.00	4 - Discovery	5.5	\$1,512.50	\$1,512.50
				6 - Pleadings, Briefs and Legal Research	1	\$275.00	\$275.00
					6.5	\$1,787.50	\$1,787.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	GUERRA, P. CAMILLE (Partner)	\$935.00	\$415.00	5 - Document Review	0.9	\$841.50	\$373.50
					0.9	\$841.50	\$373.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	GUERRA, P. CAMILLE (Partner)	\$935.00	\$895.00	3 - Case Management and Litigation Strategy	115.3	\$107,805.50	\$103,193.50
				4 - Discovery	40	\$37,400.00	\$35,800.00
				6 - Pleadings, Briefs and Legal Research	28.3	\$26,460.50	\$25,328.50
				8 - Experts/Consultants	2	\$1,870.00	\$1,790.00
					185.6	\$173,536.00	\$166,112.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	MCBAIN, CATHERINE (Associate)	\$505.00	\$505.00	3 - Case Management and Litigation Strategy	0.3	\$151.50	\$151.50
				6 - Pleadings, Briefs and Legal Research	102.7	\$51,863.50	\$51,863.50
				7 - Court Appearances and Preparation	0.7	\$353.50	\$353.50
					103.7	\$52,368.50	\$52,368.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	NARASIMHAN, AJIT (Paralegal)	\$215.00	\$215.00	3 - Case Management and Litigation Strategy	2.5	\$537.50	\$537.50
					2.5	\$537.50	\$537.50
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	RATAJESAK, VICKI (Paralegal)	\$235.00	\$235.00	3 - Case Management and Litigation Strategy	0.2	\$47.00	\$47.00
				6 - Pleadings, Briefs and Legal Research	2.8	\$658.00	\$658.00
					3	\$705.00	\$705.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	ROBINSON, JEREMY (Partner)	\$950.00	\$895.00	3 - Case Management and Litigation Strategy	19.8	\$18,810.00	\$17,721.00
				6 - Pleadings, Briefs and Legal Research	49.2	\$46,740.00	\$44,034.00
				7 - Court Appearances and Preparation	2.4	\$2,280.00	\$2,148.00
					71.4	\$67,830.00	\$63,903.00
Casey Gerry Schenk Francavilla Blatt & Penfield LLP	SINNING, NANCY (Paralegal)	\$265.00	\$265.00	3 - Case Management and Litigation Strategy	11.5	\$3,047.50	\$3,047.50
				6 - Pleadings, Briefs and Legal Research	2	\$530.00	\$530.00
					13.5	\$3,577.50	\$3,577.50
Dicello Levitt & Casey LLC	BANKS, SHARON (Paralegal)	\$415.00	\$275.00	3 - Case Management and Litigation Strategy	10.7	\$4,440.50	\$2,942.50
					10.7	\$4,440.50	\$2,942.50
Dicello Levitt & Casey LLC	FERRI, DANIEL (Partner)	\$1,110.00	\$895.00	3 - Case Management and Litigation Strategy	12.4	\$13,764.00	\$11,098.00
				6 - Pleadings, Briefs and Legal Research	8.9	\$9,879.00	\$7,965.50
				7 - Court Appearances and Preparation	4.3	\$4,773.00	\$3,848.50
					25.6	\$28,416.00	\$22,912.00
Dicello Levitt & Casey LLC	HAWAL, JUSTIN (Partner)	\$1,000.00	\$895.00	6 - Pleadings, Briefs and Legal Research	4.8	\$4,800.00	\$4,296.00
					4.8	\$4,800.00	\$4,296.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
Dicello Levitt & Casey LLC	LEVITT, ADAM (Partner)	\$1,430.00	\$895.00	3 - Case Management and Litigation Strategy	82.3	\$117,689.00	\$73,658.50
				4 - Discovery	6.8	\$9,724.00	\$6,086.00
				6 - Pleadings, Briefs and Legal Research	64.4	\$92,092.00	\$57,638.00
				7 - Court Appearances and Preparation	36.2	\$51,766.00	\$32,399.00
					189.7	\$271,271.00	\$169,781.50
Dicello Levitt & Casey LLC	OTTO, ASHTIN (Paralegal)	\$325.00	\$275.00	3 - Case Management and Litigation Strategy	0.8	\$260.00	\$220.00
					0.8	\$260.00	\$220.00
Dicello Levitt & Casey LLC	PROM, ADAM (Paralegal)	\$760.00	\$275.00	3 - Case Management and Litigation Strategy	0.7	\$532.00	\$192.50
				6 - Pleadings, Briefs and Legal Research	19.4	\$14,744.00	\$5,335.00
				7 - Court Appearances and Preparation	2	\$1,520.00	\$550.00
					22.1	\$16,796.00	\$6,077.50
Dicello Levitt & Casey LLC	TANGREN, JOHN (Partner)	\$1,210.00	\$895.00	2 - Investigations and Factual Research	0.2	\$242.00	\$179.00
				3 - Case Management and Litigation Strategy	27.7	\$33,517.00	\$24,791.50
				4 - Discovery	3.1	\$3,751.00	\$2,774.50
				6 - Pleadings, Briefs and Legal Research	54.5	\$65,945.00	\$48,777.50
				7 - Court Appearances and Preparation	8.5	\$10,285.00	\$7,607.50
	94	\$113,740.00	\$84,130.00				
Dicello Levitt & Casey LLC	VESEER, JULIA (Paralegal)	\$400.00	\$275.00	6 - Pleadings, Briefs and Legal Research	12.9	\$5,160.00	\$3,547.50
					12.9	\$5,160.00	\$3,547.50
Gibbs Law Group, LLP	BLOOMFIELD, JOSHUA (Of Counsel)	\$900.00	\$415.00	5 - Document Review	100.7	\$90,630.00	\$41,790.50
					100.7	\$90,630.00	\$41,790.50
Gibbs Law Group, LLP	BLOOMFIELD, JOSHUA (Of Counsel)	\$900.00	\$895.00	3 - Case Management and Litigation Strategy	47.7	\$42,930.00	\$42,691.50
				4 - Discovery	352	\$316,800.00	\$315,040.00
				6 - Pleadings, Briefs and Legal Research	36.1	\$32,490.00	\$32,309.50
					435.8	\$392,220.00	\$390,041.00
Gibbs Law Group, LLP	BLUMENTHAL, AARON (Associate)	\$605.00	\$600.00	2 - Investigations and Factual Research	15.3	\$9,256.50	\$9,180.00
				6 - Pleadings, Briefs and Legal Research	2.8	\$1,694.00	\$1,680.00
					18.1	\$10,950.50	\$10,860.00
Gibbs Law Group, LLP	CORBITT, CAROLINE (Associate)	\$725.00	\$600.00	2 - Investigations and Factual Research	6.3	\$4,567.50	\$3,780.00
				3 - Case Management and Litigation Strategy	1.2	\$870.00	\$720.00
					7.5	\$5,437.50	\$4,500.00
Gibbs Law Group, LLP	GARDNER, DORRY (Staff Attorney)	\$415.00	\$415.00	5 - Document Review	1296.8	\$538,172.00	\$538,172.00
					1296.8	\$538,172.00	\$538,172.00
Gibbs Law Group, LLP	GIBBONEY, KYLA (Associate)	\$605.00	\$600.00	3 - Case Management and Litigation Strategy	0.1	\$60.50	\$60.00
				7 - Court Appearances and Preparation	2.6	\$1,573.00	\$1,560.00
					2.7	\$1,633.50	\$1,620.00
Gibbs Law Group, LLP	GIBBS, ERIC (Partner)	\$1,065.00	\$895.00	3 - Case Management and Litigation Strategy	0.8	\$852.00	\$716.00
				4 - Discovery	0.4	\$426.00	\$358.00
				6 - Pleadings, Briefs and Legal Research	3.8	\$4,047.00	\$3,401.00
					5	\$5,325.00	\$4,475.00
Gibbs Law Group, LLP	GIBBS, JASON (Paralegal)	\$280.00	\$275.00	2 - Investigations and Factual Research	31.7	\$8,876.00	\$8,717.50

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
					31.7	\$8,876.00	\$8,717.50
Gibbs Law Group, LLP	HUGHES, DYLAN (Partner)	\$935.00	\$895.00	2 - Investigations and Factual Research	9.4	\$8,789.00	\$8,413.00
				6 - Pleadings, Briefs and Legal Research	8.1	\$7,573.50	\$7,249.50
					17.5	\$16,362.50	\$15,662.50
Gibbs Law Group, LLP	HUTCHINSON, PARKER (Of Counsel)	\$660.00	\$660.00	3 - Case Management and Litigation Strategy	1.4	\$924.00	\$924.00
				4 - Discovery	8	\$5,280.00	\$5,280.00
				6 - Pleadings, Briefs and Legal Research	71.2	\$46,992.00	\$46,992.00
					80.6	\$53,196.00	\$53,196.00
Gibbs Law Group, LLP	KOSBIE, JEFF (Associate)	\$605.00	\$600.00	2 - Investigations and Factual Research	0.4	\$242.00	\$240.00
				3 - Case Management and Litigation Strategy	7.9	\$4,779.50	\$4,740.00
				4 - Discovery	6	\$3,630.00	\$3,600.00
				6 - Pleadings, Briefs and Legal Research	52	\$31,460.00	\$31,200.00
					66.3	\$40,111.50	\$39,780.00
Gibbs Law Group, LLP	LOPEZ, STEVE (Partner)	\$670.00	\$670.00	2 - Investigations and Factual Research	9.4	\$6,298.00	\$6,298.00
				3 - Case Management and Litigation Strategy	3.2	\$2,144.00	\$2,144.00
				4 - Discovery	5.5	\$3,685.00	\$3,685.00
				6 - Pleadings, Briefs and Legal Research	4.5	\$3,015.00	\$3,015.00
					22.6	\$15,142.00	\$15,142.00
Gibbs Law Group, LLP	MAH, ROSANNE (Of Counsel)	\$740.00	\$740.00	2 - Investigations and Factual Research	7.7	\$5,698.00	\$5,698.00
				3 - Case Management and Litigation Strategy	0.9	\$666.00	\$666.00
				4 - Discovery	52	\$38,480.00	\$38,480.00
					60.6	\$44,844.00	\$44,844.00
Gibbs Law Group, LLP	PROTHERO, ALYSSA (Of Counsel)	\$415.00	\$415.00	4 - Discovery	13.3	\$5,519.50	\$5,519.50
					13.3	\$5,519.50	\$5,519.50
Gibbs Law Group, LLP	PROTHERO, ALYSSA (Staff Attorney)	\$415.00	\$415.00	3 - Case Management and Litigation Strategy	39	\$16,185.00	\$16,185.00
				4 - Discovery	962.4	\$399,396.00	\$399,396.00
				5 - Document Review	1674.7	\$695,000.50	\$695,000.50
				6 - Pleadings, Briefs and Legal Research	159.5	\$66,192.50	\$66,192.50
					2835.6	\$1,176,774.00	\$1,176,774.00
Gibbs Law Group, LLP	RIVAS, ROSEMARY (Partner)	\$995.00	\$415.00	5 - Document Review	1.3	\$1,293.50	\$539.50
					1.3	\$1,293.50	\$539.50
Gibbs Law Group, LLP	RIVAS, ROSEMARY (Partner)	\$995.00	\$895.00	2 - Investigations and Factual Research	3.6	\$3,582.00	\$3,222.00
				3 - Case Management and Litigation Strategy	9.2	\$9,154.00	\$8,234.00
				4 - Discovery	28.8	\$28,656.00	\$25,776.00
				6 - Pleadings, Briefs and Legal Research	50.6	\$50,347.00	\$45,287.00
				7 - Court Appearances and Preparation	10.3	\$10,248.50	\$9,218.50
					102.5	\$101,987.50	\$91,737.50
Gibbs Law Group, LLP	SOMINSKI, DASHA (Associate)	\$365.00	\$365.00	2 - Investigations and Factual Research	0.2	\$73.00	\$73.00
				6 - Pleadings, Briefs and Legal Research	9.8	\$3,577.00	\$3,577.00
					10	\$3,650.00	\$3,650.00
Gibbs Law Group, LLP	STEIN, DAVE (Partner)	\$815.00	\$815.00	2 - Investigations and Factual Research	0.2	\$163.00	\$163.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
				3 - Case Management and Litigation Strategy	1	\$815.00	\$815.00
				6 - Pleadings, Briefs and Legal Research	1.6	\$1,304.00	\$1,304.00
					2.8	\$2,282.00	\$2,282.00
Hellmuth & Johnson PLLC	BORLE, CORTLAND (Associate)	\$450.00	\$450.00	2 - Investigations and Factual Research	1.6	\$720.00	\$720.00
					1.6	\$720.00	\$720.00
Hellmuth & Johnson PLLC	CAPRA, REBECCA (Paralegal)	\$165.00	\$165.00	2 - Investigations and Factual Research	0.4	\$66.00	\$66.00
					0.4	\$66.00	\$66.00
Hellmuth & Johnson PLLC	CASHMAN, MICHAEL (Partner)	\$895.00	\$895.00	2 - Investigations and Factual Research	21.2	\$18,974.00	\$18,974.00
				3 - Case Management and Litigation Strategy	5.5	\$4,922.50	\$4,922.50
				4 - Discovery	8	\$7,160.00	\$7,160.00
				6 - Pleadings, Briefs and Legal Research	14.4	\$12,888.00	\$12,888.00
				7 - Court Appearances and Preparation	25.3	\$22,643.50	\$22,643.50
					74.4	\$66,588.00	\$66,588.00
Hellmuth & Johnson PLLC	HAGSTROM, RICHARD (Partner)	\$980.00	\$895.00	2 - Investigations and Factual Research	37.4	\$36,652.00	\$33,473.00
				3 - Case Management and Litigation Strategy	41.5	\$40,670.00	\$37,142.50
				4 - Discovery	0.7	\$686.00	\$626.50
				6 - Pleadings, Briefs and Legal Research	35.8	\$35,084.00	\$32,041.00
				7 - Court Appearances and Preparation	3.2	\$3,136.00	\$2,864.00
					118.6	\$116,228.00	\$106,147.00
Hellmuth & Johnson PLLC	KUHLMANN, NICHOLAS (Associate)	\$600.00	\$600.00	2 - Investigations and Factual Research	53.5	\$32,100.00	\$32,100.00
				3 - Case Management and Litigation Strategy	15.4	\$9,240.00	\$9,240.00
				4 - Discovery	0.2	\$120.00	\$120.00
				6 - Pleadings, Briefs and Legal Research	24.4	\$14,640.00	\$14,640.00
					93.5	\$56,100.00	\$56,100.00
Hellmuth & Johnson PLLC	NELSON, BRIAN (Associate)	\$650.00	\$415.00	5 - Document Review	2.1	\$1,365.00	\$871.50
					2.1	\$1,365.00	\$871.50
Hellmuth & Johnson PLLC	NELSON, BRIAN (Associate)	\$650.00	\$600.00	3 - Case Management and Litigation Strategy	10.7	\$6,955.00	\$6,420.00
				4 - Discovery	3.2	\$2,080.00	\$1,920.00
					13.9	\$9,035.00	\$8,340.00
Hellmuth & Johnson PLLC	OTSUKA, GREGORY (Partner)	\$760.00	\$760.00	2 - Investigations and Factual Research	31.3	\$23,788.00	\$23,788.00
				3 - Case Management and Litigation Strategy	13.5	\$10,260.00	\$10,260.00
				4 - Discovery	0.5	\$380.00	\$380.00
				6 - Pleadings, Briefs and Legal Research	69	\$52,440.00	\$52,440.00
					114.3	\$86,868.00	\$86,868.00
Hellmuth & Johnson PLLC	ZERBE, RODNEY (Partner)	\$610.00	\$610.00	2 - Investigations and Factual Research	0.3	\$183.00	\$183.00
					0.3	\$183.00	\$183.00
Jeffrey Lipinski	LIPINSKI, JEFFREY (Partner)	\$415.00	\$415.00	4 - Discovery	20.9	\$8,673.50	\$8,673.50
				5 - Document Review	202.5	\$84,037.50	\$84,037.50
				8 - Experts/Consultants	433.5	\$179,902.50	\$179,902.50
					656.9	\$272,613.50	\$272,613.50
Keller Rohrbach L.L.P.	BORSETH, XANNIE (Paralegal)	\$300.00	\$275.00	3 - Case Management and Litigation Strategy	0.2	\$60.00	\$55.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
				6 - Pleadings, Briefs and Legal Research	18.4	\$5,520.00	\$5,060.00
					18.6	\$5,580.00	\$5,115.00
Keller Rohrbach L.L.P.	BOWANKO, RACHEL (Paralegal)	\$320.00	\$275.00	6 - Pleadings, Briefs and Legal Research	60.5	\$19,360.00	\$16,637.50
					60.5	\$19,360.00	\$16,637.50
Keller Rohrbach L.L.P.	CAPPIO, GRETCHEN (Partner)	\$1,265.00	\$895.00	2 - Investigations and Factual Research	4.5	\$5,692.50	\$4,027.50
				3 - Case Management and Litigation Strategy	79.2	\$100,188.00	\$70,884.00
				4 - Discovery	43	\$54,395.00	\$38,485.00
				6 - Pleadings, Briefs and Legal Research	32.1	\$40,606.50	\$28,729.50
				7 - Court Appearances and Preparation	40.7	\$51,485.50	\$36,426.50
				12 - Settlement	0.8	\$1,012.00	\$716.00
					200.3	\$253,379.50	\$179,268.50
Keller Rohrbach L.L.P.	CHAN, ALEX (Paralegal)	\$400.00	\$275.00	3 - Case Management and Litigation Strategy	48.2	\$19,280.00	\$13,255.00
					48.2	\$19,280.00	\$13,255.00
Keller Rohrbach L.L.P.	DANIEL, ADELE (Associate)	\$650.00	\$600.00	3 - Case Management and Litigation Strategy	0.1	\$65.00	\$60.00
				6 - Pleadings, Briefs and Legal Research	118.7	\$77,155.00	\$71,220.00
					118.8	\$77,220.00	\$71,280.00
Keller Rohrbach L.L.P.	DE VRIES, AJ (Paralegal)	\$425.00	\$275.00	6 - Pleadings, Briefs and Legal Research	15.3	\$6,502.50	\$4,207.50
					15.3	\$6,502.50	\$4,207.50
Keller Rohrbach L.L.P.	EMERSON, ERIKA (Associate)	\$605.00	\$600.00	3 - Case Management and Litigation Strategy	5.8	\$3,509.00	\$3,480.00
				6 - Pleadings, Briefs and Legal Research	36.4	\$22,022.00	\$21,840.00
					42.2	\$25,531.00	\$25,320.00
Keller Rohrbach L.L.P.	EVANS, JOHN M. (Paralegal)	\$340.00	\$275.00	4 - Discovery	10.2	\$3,468.00	\$2,805.00
					10.2	\$3,468.00	\$2,805.00
Keller Rohrbach L.L.P.	FIERRO, ERIC (Partner)	\$910.00	\$415.00	5 - Document Review	4	\$3,640.00	\$1,660.00
					4	\$3,640.00	\$1,660.00
Keller Rohrbach L.L.P.	FIERRO, ERIC (Partner)	\$910.00	\$895.00	3 - Case Management and Litigation Strategy	1.5	\$1,365.00	\$1,342.50
				4 - Discovery	39.3	\$35,763.00	\$35,173.50
					40.8	\$37,128.00	\$36,516.00
Keller Rohrbach L.L.P.	GARDNER, KATHRYN (Paralegal)	\$315.00	\$275.00	2 - Investigations and Factual Research	2.8	\$882.00	\$770.00
				3 - Case Management and Litigation Strategy	16.9	\$5,323.50	\$4,647.50
					19.7	\$6,205.50	\$5,417.50
Keller Rohrbach L.L.P.	GARRIDO, JOEL (Paralegal)	\$365.00	\$275.00	3 - Case Management and Litigation Strategy	17.6	\$6,424.00	\$4,840.00
					17.6	\$6,424.00	\$4,840.00
Keller Rohrbach L.L.P.	GOINS, MAX (Associate)	\$585.00	\$585.00	6 - Pleadings, Briefs and Legal Research	2.7	\$1,579.50	\$1,579.50
					2.7	\$1,579.50	\$1,579.50
Keller Rohrbach L.L.P.	GOTTO, ALEX (Paralegal)	\$330.00	\$275.00	4 - Discovery	0.5	\$165.00	\$137.50
					0.5	\$165.00	\$137.50
Keller Rohrbach L.L.P.	GUSSIN, ZACHARY (Associate)	\$625.00	\$600.00	3 - Case Management and Litigation Strategy	1.4	\$875.00	\$840.00
				4 - Discovery	42.7	\$26,687.50	\$25,620.00
				6 - Pleadings, Briefs and Legal Research	140.3	\$87,687.50	\$84,180.00
					184.4	\$115,250.00	\$110,640.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper
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Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
Keller Rohrback L.L.P.	GUTHRIE, HEATHER R. (Paralegal)	\$330.00	\$275.00	3 - Case Management and Litigation Strategy	0.8	\$264.00	\$220.00
					0.8	\$264.00	\$220.00
Keller Rohrback L.L.P.	HARRIS, ARDUA (Paralegal)	\$270.00	\$270.00	3 - Case Management and Litigation Strategy	4	\$1,080.00	\$1,080.00
					4	\$1,080.00	\$1,080.00
Keller Rohrback L.L.P.	HILL, JENNIFER (Paralegal)	\$425.00	\$275.00	3 - Case Management and Litigation Strategy	2	\$850.00	\$550.00
				4 - Discovery	0.5	\$212.50	\$137.50
					2.5	\$1,062.50	\$687.50
Keller Rohrback L.L.P.	JANSEN, JESSICA S. (Paralegal)	\$410.00	\$275.00	3 - Case Management and Litigation Strategy	0.1	\$41.00	\$27.50
					0.1	\$41.00	\$27.50
Keller Rohrback L.L.P.	JONES, KRIS C. (Staff Attorney)	\$480.00	\$415.00	4 - Discovery	14	\$6,720.00	\$5,810.00
				5 - Document Review	1806.9	\$867,312.00	\$749,863.50
					1820.9	\$874,032.00	\$755,673.50
Keller Rohrback L.L.P.	LAPORTE, KAIT (Paralegal)	\$280.00	\$275.00	3 - Case Management and Litigation Strategy	7.6	\$2,128.00	\$2,090.00
					7.6	\$2,128.00	\$2,090.00
Keller Rohrback L.L.P.	LIKIT, JAN (Paralegal)	\$260.00	\$260.00	3 - Case Management and Litigation Strategy	0.4	\$104.00	\$104.00
					0.4	\$104.00	\$104.00
Keller Rohrback L.L.P.	MARRIOTT, PATRICK T. (Associate)	\$545.00	\$545.00	3 - Case Management and Litigation Strategy	5.4	\$2,943.00	\$2,943.00
				4 - Discovery	6	\$3,270.00	\$3,270.00
					11.4	\$6,213.00	\$6,213.00
Keller Rohrback L.L.P.	MCCENEY, ABIGAIL (Paralegal)	\$260.00	\$260.00	3 - Case Management and Litigation Strategy	1	\$260.00	\$260.00
					1	\$260.00	\$260.00
Keller Rohrback L.L.P.	MCDEVITT, RYAN (Partner)	\$935.00	\$415.00	5 - Document Review	4.6	\$4,301.00	\$1,909.00
					4.6	\$4,301.00	\$1,909.00
Keller Rohrback L.L.P.	MCDEVITT, RYAN (Partner)	\$935.00	\$895.00	2 - Investigations and Factual Research	12.4	\$11,594.00	\$11,098.00
				3 - Case Management and Litigation Strategy	309.9	\$289,756.50	\$277,360.50
				4 - Discovery	168.9	\$157,921.50	\$151,165.50
				6 - Pleadings, Briefs and Legal Research	345.2	\$322,762.00	\$308,954.00
				7 - Court Appearances and Preparation	37.1	\$34,688.50	\$33,204.50
				8 - Experts/Consultants	1	\$935.00	\$895.00
				12 - Settlement	2.3	\$2,150.50	\$2,058.50
					876.8	\$819,808.00	\$784,736.00
Keller Rohrback L.L.P.	MERSING, JACOB (Paralegal)	\$460.00	\$275.00	2 - Investigations and Factual Research	20	\$9,200.00	\$5,500.00
				3 - Case Management and Litigation Strategy	208.3	\$95,818.00	\$57,282.50
				4 - Discovery	140.2	\$64,492.00	\$38,555.00
				5 - Document Review	2.6	\$1,196.00	\$715.00
				6 - Pleadings, Briefs and Legal Research	80.4	\$36,984.00	\$22,110.00
				7 - Court Appearances and Preparation	3.5	\$1,610.00	\$962.50
				12 - Settlement	3.4	\$1,564.00	\$935.00
					458.4	\$210,864.00	\$126,060.00
Keller Rohrback L.L.P.	MEYER, WYATT (Paralegal)	\$90.00	\$90.00	3 - Case Management and Litigation Strategy	12	\$1,080.00	\$1,080.00
					12	\$1,080.00	\$1,080.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper
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Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
Keller Rohrbach L.L.P.	MISHLER, LARA (Paralegal)	\$330.00	\$275.00	6 - Pleadings, Briefs and Legal Research	4	\$1,320.00	\$1,100.00
					4	\$1,320.00	\$1,100.00
Keller Rohrbach L.L.P.	MITTENTHAL, ROBERT O. (Paralegal)	\$440.00	\$275.00	4 - Discovery	4.3	\$1,892.00	\$1,182.50
					4.3	\$1,892.00	\$1,182.50
Keller Rohrbach L.L.P.	MOROWITZ, RACHEL (Associate)	\$525.00	\$525.00	2 - Investigations and Factual Research	119.2	\$62,580.00	\$62,580.00
				3 - Case Management and Litigation Strategy	59.9	\$31,447.50	\$31,447.50
				4 - Discovery	47	\$24,675.00	\$24,675.00
				6 - Pleadings, Briefs and Legal Research	220.7	\$115,867.50	\$115,867.50
				7 - Court Appearances and Preparation	32.8	\$17,220.00	\$17,220.00
					479.6	\$251,790.00	\$251,790.00
Keller Rohrbach L.L.P.	NEALIOUS, BIANCA (Paralegal)	\$335.00	\$275.00	3 - Case Management and Litigation Strategy	41.2	\$13,802.00	\$11,330.00
				4 - Discovery	0.4	\$134.00	\$110.00
				6 - Pleadings, Briefs and Legal Research	6	\$2,010.00	\$1,650.00
				7 - Court Appearances and Preparation	2.2	\$737.00	\$605.00
				8 - Experts/Consultants	0.3	\$100.50	\$82.50
					50.1	\$16,783.50	\$13,777.50
Keller Rohrbach L.L.P.	NICHOLS, RAENY M. (Paralegal)	\$330.00	\$275.00	3 - Case Management and Litigation Strategy	0.1	\$33.00	\$27.50
					0.1	\$33.00	\$27.50
Keller Rohrbach L.L.P.	PARRILLA, CAVIN L. (Paralegal)	\$340.00	\$275.00	4 - Discovery	0.7	\$238.00	\$192.50
					0.7	\$238.00	\$192.50
Keller Rohrbach L.L.P.	PREUSCH, MATTHEW J. (Associate)	\$750.00	\$600.00	3 - Case Management and Litigation Strategy	0.2	\$150.00	\$120.00
					0.2	\$150.00	\$120.00
Keller Rohrbach L.L.P.	PRY, JONATHAN (Paralegal)	\$260.00	\$260.00	3 - Case Management and Litigation Strategy	1.7	\$442.00	\$442.00
					1.7	\$442.00	\$442.00
Keller Rohrbach L.L.P.	READ, SYDNEY (Associate)	\$510.00	\$510.00	3 - Case Management and Litigation Strategy	70.5	\$35,955.00	\$35,955.00
				4 - Discovery	362.7	\$184,977.00	\$184,977.00
				6 - Pleadings, Briefs and Legal Research	41.8	\$21,318.00	\$21,318.00
				7 - Court Appearances and Preparation	4.5	\$2,295.00	\$2,295.00
				12 - Settlement	1.1	\$561.00	\$561.00
					480.6	\$245,106.00	\$245,106.00
Keller Rohrbach L.L.P.	RODGERS, AUBREY (Paralegal)	\$385.00	\$275.00	3 - Case Management and Litigation Strategy	15	\$5,775.00	\$4,125.00
					15	\$5,775.00	\$4,125.00
Keller Rohrbach L.L.P.	SARKO, LYNN (Partner)	\$1,450.00	\$895.00	2 - Investigations and Factual Research	0.5	\$725.00	\$447.50
				3 - Case Management and Litigation Strategy	8.1	\$11,745.00	\$7,249.50
				8 - Experts/Consultants	0.7	\$1,015.00	\$628.50
					9.3	\$13,485.00	\$8,323.50
Keller Rohrbach L.L.P.	SMITH, ALEX (Paralegal)	\$395.00	\$275.00	3 - Case Management and Litigation Strategy	2.9	\$1,145.50	\$797.50
					2.9	\$1,145.50	\$797.50
Keller Rohrbach L.L.P.	SPANGLER, BRIAN E. (Paralegal)	\$365.00	\$275.00	3 - Case Management and Litigation Strategy	37.9	\$13,833.50	\$10,422.50
				6 - Pleadings, Briefs and Legal Research	2.1	\$766.50	\$577.50
				7 - Court Appearances and Preparation	0.2	\$73.00	\$55.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
					40.2	\$14,673.00	\$11,055.00
Keller Rohrbach L.L.P.	STRECKERT, PATRICK M. T.M. (Associate)	\$510.00	\$510.00	3 - Case Management and Litigation Strategy	6	\$3,060.00	\$3,060.00
				4 - Discovery	12.7	\$6,477.00	\$6,477.00
					18.7	\$9,537.00	\$9,537.00
Keller Rohrbach L.L.P.	TIEZAZU, Y. TIZZY (Paralegal)	\$305.00	\$275.00	3 - Case Management and Litigation Strategy	1.1	\$335.50	\$302.50
				4 - Discovery	0.6	\$183.00	\$165.00
				6 - Pleadings, Briefs and Legal Research	0.2	\$61.00	\$55.00
				7 - Court Appearances and Preparation	0.2	\$61.00	\$55.00
				12 - Settlement	0.1	\$30.50	\$27.50
					2.2	\$671.00	\$605.00
Keller Rohrbach L.L.P.	TUNKKARI, KATJA (Paralegal)	\$300.00	\$275.00	3 - Case Management and Litigation Strategy	21.6	\$6,480.00	\$5,940.00
					21.6	\$6,480.00	\$5,940.00
Keller Rohrbach L.L.P.	VERDUGO, GABE E. (Associate)	\$630.00	\$600.00	3 - Case Management and Litigation Strategy	13.1	\$8,253.00	\$7,860.00
				4 - Discovery	18.8	\$11,844.00	\$11,280.00
				6 - Pleadings, Briefs and Legal Research	102	\$64,260.00	\$61,200.00
				12 - Settlement	0.2	\$126.00	\$120.00
					134.1	\$84,483.00	\$80,460.00
Keller Rohrbach L.L.P.	WILKINSON, CARRIE (Paralegal)	\$395.00	\$275.00	2 - Investigations and Factual Research	0.5	\$197.50	\$137.50
					0.5	\$197.50	\$137.50
Keller Rohrbach L.L.P.	WILSON, KIANA (Paralegal)	\$365.00	\$275.00	3 - Case Management and Litigation Strategy	7.3	\$2,664.50	\$2,007.50
				4 - Discovery	2	\$730.00	\$550.00
				6 - Pleadings, Briefs and Legal Research	0.1	\$36.50	\$27.50
					9.4	\$3,431.00	\$2,585.00
Keller Rohrbach L.L.P.	WRIGHT, EMMA (Paralegal)	\$595.00	\$275.00	3 - Case Management and Litigation Strategy	11.5	\$6,842.50	\$3,162.50
				6 - Pleadings, Briefs and Legal Research	17.7	\$10,531.50	\$4,867.50
				7 - Court Appearances and Preparation	0.8	\$476.00	\$220.00
					30	\$17,850.00	\$8,250.00
Kessler Topaz Meltzer & Check, LLP	ADAMS, SCOTT (Staff Attorney)	\$385.00	\$385.00	6 - Pleadings, Briefs and Legal Research	2.5	\$962.50	\$962.50
					2.5	\$962.50	\$962.50
Kessler Topaz Meltzer & Check, LLP	AMJED, NAUMON (Partner)	\$970.00	\$895.00	3 - Case Management and Litigation Strategy	2.1	\$2,037.00	\$1,879.50
				6 - Pleadings, Briefs and Legal Research	1.4	\$1,358.00	\$1,253.00
					3.5	\$3,395.00	\$3,132.50
Kessler Topaz Meltzer & Check, LLP	BELL, ADRIENNE (Associate)	\$575.00	\$575.00	3 - Case Management and Litigation Strategy	189.9	\$109,192.50	\$109,192.50
				6 - Pleadings, Briefs and Legal Research	8	\$4,600.00	\$4,600.00
					197.9	\$113,792.50	\$113,792.50
Kessler Topaz Meltzer & Check, LLP	BLOCK, ADAM (Contract Attorney)	\$370.00	\$370.00	5 - Document Review	218	\$80,660.00	\$80,660.00
					218	\$80,660.00	\$80,660.00
Kessler Topaz Meltzer & Check, LLP	BLOCK, ADAM (Staff Attorney)	\$370.00	\$370.00	4 - Discovery	26.8	\$9,916.00	\$9,916.00
				5 - Document Review	819.9	\$303,363.00	\$303,363.00
					846.7	\$313,279.00	\$313,279.00
Kessler Topaz Meltzer & Check, LLP	CORSON, MEGAN (Paralegal)	\$320.00	\$275.00	4 - Discovery	14.2	\$4,544.00	\$3,905.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
				6 - Pleadings, Briefs and Legal Research	4.5	\$1,440.00	\$1,237.50
					18.7	\$5,984.00	\$5,142.50
Kessler Topaz Meltzer & Check, LLP	ELANGO VAN, VARUN (Associate)	\$420.00	\$420.00	6 - Pleadings, Briefs and Legal Research	3	\$1,260.00	\$1,260.00
					3	\$1,260.00	\$1,260.00
Kessler Topaz Meltzer & Check, LLP	GERTNER, ABIGAIL (Associate)	\$385.00	\$385.00	6 - Pleadings, Briefs and Legal Research	10.6	\$4,081.00	\$4,081.00
					10.6	\$4,081.00	\$4,081.00
Kessler Topaz Meltzer & Check, LLP	GILLIS, MARTHA (Contract Attorney)	\$370.00	\$370.00	5 - Document Review	44.1	\$16,317.00	\$16,317.00
					44.1	\$16,317.00	\$16,317.00
Kessler Topaz Meltzer & Check, LLP	GRADEN, TYLER (Associate)	\$965.00	\$600.00	3 - Case Management and Litigation Strategy	6	\$5,790.00	\$3,600.00
					6	\$5,790.00	\$3,600.00
Kessler Topaz Meltzer & Check, LLP	GRADEN, TYLER (Partner)	\$965.00	\$895.00	4 - Discovery	0.9	\$868.50	\$805.50
				12 - Settlement	0.1	\$96.50	\$89.50
					1	\$965.00	\$895.00
Kessler Topaz Meltzer & Check, LLP	HEMSLEY, COURTNEY (Paralegal)	\$405.00	\$275.00	3 - Case Management and Litigation Strategy	32.8	\$13,284.00	\$9,020.00
				4 - Discovery	18.5	\$7,492.50	\$5,087.50
				6 - Pleadings, Briefs and Legal Research	133	\$53,865.00	\$36,575.00
				7 - Court Appearances and Preparation	1	\$405.00	\$275.00
				8 - Experts/Consultants	1.3	\$526.50	\$357.50
					186.6	\$75,573.00	\$51,315.00
Kessler Topaz Meltzer & Check, LLP	HERLING, BRANDON (Associate)	\$390.00	\$390.00	6 - Pleadings, Briefs and Legal Research	85.4	\$33,306.00	\$33,306.00
					85.4	\$33,306.00	\$33,306.00
Kessler Topaz Meltzer & Check, LLP	HINDMARSH, LISA (Paralegal)	\$255.00	\$255.00	6 - Pleadings, Briefs and Legal Research	2.1	\$535.50	\$535.50
					2.1	\$535.50	\$535.50
Kessler Topaz Meltzer & Check, LLP	HOWELL, MATTHEW (Associate)	\$420.00	\$420.00	4 - Discovery	6.9	\$2,898.00	\$2,898.00
					6.9	\$2,898.00	\$2,898.00
Kessler Topaz Meltzer & Check, LLP	JACOBSON, JORDAN (Associate)	\$560.00	\$560.00	6 - Pleadings, Briefs and Legal Research	25.2	\$14,112.00	\$14,112.00
					25.2	\$14,112.00	\$14,112.00
Kessler Topaz Meltzer & Check, LLP	JEFFREY, CAROLYN (Staff Attorney)	\$300.00	\$300.00	2 - Investigations and Factual Research	21	\$6,300.00	\$6,300.00
					21	\$6,300.00	\$6,300.00
Kessler Topaz Meltzer & Check, LLP	JULIANO, MAGGIE (Staff Attorney)	\$385.00	\$385.00	3 - Case Management and Litigation Strategy	0.2	\$77.00	\$77.00
				6 - Pleadings, Briefs and Legal Research	2.6	\$1,001.00	\$1,001.00
					2.8	\$1,078.00	\$1,078.00
Kessler Topaz Meltzer & Check, LLP	LESSER, NATALIE (Associate)	\$535.00	\$535.00	3 - Case Management and Litigation Strategy	13.8	\$7,383.00	\$7,383.00
				4 - Discovery	17.2	\$9,202.00	\$9,202.00
				6 - Pleadings, Briefs and Legal Research	205.8	\$110,103.00	\$110,103.00
				8 - Experts/Consultants	2.4	\$1,284.00	\$1,284.00
				12 - Settlement	0.3	\$160.50	\$160.50
					239.5	\$128,132.50	\$128,132.50
Kessler Topaz Meltzer & Check, LLP	MARO, JAMES (Partner)	\$950.00	\$895.00	3 - Case Management and Litigation Strategy	2	\$1,900.00	\$1,790.00
				4 - Discovery	2.9	\$2,755.00	\$2,595.50
				12 - Settlement	0.2	\$190.00	\$179.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
					5.1	\$4,845.00	\$4,564.50
Kessler Topaz Meltzer & Check, LLP	MCGINLEY, LAUREN (Associate)	\$480.00	\$480.00	3 - Case Management and Litigation Strategy	4.8	\$2,304.00	\$2,304.00
				4 - Discovery	16.1	\$7,728.00	\$7,728.00
				6 - Pleadings, Briefs and Legal Research	81.6	\$39,168.00	\$39,168.00
				7 - Court Appearances and Preparation	0.8	\$384.00	\$384.00
					103.3	\$49,584.00	\$49,584.00
Kessler Topaz Meltzer & Check, LLP	MELTZER, JOSEPH (Partner)	\$1,000.00	\$895.00	2 - Investigations and Factual Research	2.5	\$2,500.00	\$2,237.50
				3 - Case Management and Litigation Strategy	28.9	\$28,900.00	\$25,865.50
				4 - Discovery	4	\$4,000.00	\$3,580.00
				6 - Pleadings, Briefs and Legal Research	35.6	\$35,600.00	\$31,862.00
				7 - Court Appearances and Preparation	25.1	\$25,100.00	\$22,464.50
				8 - Experts/Consultants	1	\$1,000.00	\$895.00
					97.1	\$97,100.00	\$86,904.50
Kessler Topaz Meltzer & Check, LLP	MONKS, WILLIAM (Staff Attorney)	\$575.00	\$415.00	2 - Investigations and Factual Research	1.1	\$632.50	\$456.50
				3 - Case Management and Litigation Strategy	1.6	\$920.00	\$664.00
					2.7	\$1,552.50	\$1,120.50
Kessler Topaz Meltzer & Check, LLP	NAJI, JONATHAN (Associate)	\$510.00	\$510.00	4 - Discovery	6.7	\$3,417.00	\$3,417.00
					6.7	\$3,417.00	\$3,417.00
Kessler Topaz Meltzer & Check, LLP	PAFFAS, HOLLY (Paralegal)	\$320.00	\$275.00	3 - Case Management and Litigation Strategy	0.4	\$128.00	\$110.00
				4 - Discovery	0.3	\$96.00	\$82.50
					0.7	\$224.00	\$192.50
Kessler Topaz Meltzer & Check, LLP	PARK, ALEX (Associate)	\$480.00	\$480.00	3 - Case Management and Litigation Strategy	0.5	\$240.00	\$240.00
				4 - Discovery	18.3	\$8,784.00	\$8,784.00
				6 - Pleadings, Briefs and Legal Research	8.8	\$4,224.00	\$4,224.00
					27.6	\$13,248.00	\$13,248.00
Kessler Topaz Meltzer & Check, LLP	PEOPLES, ANDREW (Associate)	\$455.00	\$455.00	12 - Settlement	0.5	\$227.50	\$227.50
					0.5	\$227.50	\$227.50
Kessler Topaz Meltzer & Check, LLP	PEOPLES, ANDREW (Staff Attorney)	\$455.00	\$415.00	3 - Case Management and Litigation Strategy	3.6	\$1,638.00	\$1,494.00
				4 - Discovery	350.6	\$159,523.00	\$145,499.00
				5 - Document Review	88.2	\$40,131.00	\$36,603.00
				6 - Pleadings, Briefs and Legal Research	24.2	\$11,011.00	\$10,043.00
					466.6	\$212,303.00	\$193,639.00
Kessler Topaz Meltzer & Check, LLP	PHAM, HIEN (Contract Attorney)	\$370.00	\$370.00	5 - Document Review	55.3	\$20,461.00	\$20,461.00
					55.3	\$20,461.00	\$20,461.00
Kessler Topaz Meltzer & Check, LLP	PORT, LISA LAMB (Associate)	\$750.00	\$600.00	3 - Case Management and Litigation Strategy	8	\$6,000.00	\$4,800.00
				4 - Discovery	811.7	\$608,775.00	\$487,020.00
				6 - Pleadings, Briefs and Legal Research	91.8	\$68,850.00	\$55,080.00
				7 - Court Appearances and Preparation	1.9	\$1,425.00	\$1,140.00
				12 - Settlement	5.2	\$3,900.00	\$3,120.00
					918.6	\$688,950.00	\$551,160.00
Kessler Topaz Meltzer & Check, LLP	PORT, LISA LAMB (Of Counsel)	\$750.00	\$750.00	3 - Case Management and Litigation Strategy	2.5	\$1,875.00	\$1,875.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper
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Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
				4 - Discovery	0.2	\$150.00	\$150.00
					2.7	\$2,025.00	\$2,025.00
Kessler Topaz Meltzer & Check, LLP	RIGHTER, CAITLIN (Staff Attorney)	\$260.00	\$260.00	2 - Investigations and Factual Research	11.4	\$2,964.00	\$2,964.00
					11.4	\$2,964.00	\$2,964.00
Kessler Topaz Meltzer & Check, LLP	RUSSO, LACEY (Paralegal)	\$260.00	\$260.00	6 - Pleadings, Briefs and Legal Research	0.8	\$208.00	\$208.00
					0.8	\$208.00	\$208.00
Kessler Topaz Meltzer & Check, LLP	SHERONAS, KELSEY (Associate)	\$510.00	\$510.00	3 - Case Management and Litigation Strategy	2	\$1,020.00	\$1,020.00
				4 - Discovery	125.1	\$63,801.00	\$63,801.00
					127.1	\$64,821.00	\$64,821.00
Kessler Topaz Meltzer & Check, LLP	STARLING, TEDDY (Associate)	\$475.00	\$475.00	6 - Pleadings, Briefs and Legal Research	7.5	\$3,562.50	\$3,562.50
					7.5	\$3,562.50	\$3,562.50
Kessler Topaz Meltzer & Check, LLP	SWIFT, MARY (Paralegal)	\$320.00	\$275.00	3 - Case Management and Litigation Strategy	4.3	\$1,376.00	\$1,182.50
					4.3	\$1,376.00	\$1,182.50
Kessler Topaz Meltzer & Check, LLP	TAMERIER, JULIE (Paralegal)	\$85.00	\$85.00	3 - Case Management and Litigation Strategy	0.5	\$42.50	\$42.50
				6 - Pleadings, Briefs and Legal Research	12.2	\$1,037.00	\$1,037.00
					12.7	\$1,079.50	\$1,079.50
Kessler Topaz Meltzer & Check, LLP	TOPAZ, MARC (Partner)	\$1,000.00	\$895.00	3 - Case Management and Litigation Strategy	2.5	\$2,500.00	\$2,237.50
				6 - Pleadings, Briefs and Legal Research	6	\$6,000.00	\$5,370.00
					8.5	\$8,500.00	\$7,607.50
Kessler Topaz Meltzer & Check, LLP	TROUTNER, MELISSA (Partner)	\$950.00	\$895.00	2 - Investigations and Factual Research	4.2	\$3,990.00	\$3,759.00
				3 - Case Management and Litigation Strategy	25.4	\$24,130.00	\$22,733.00
				4 - Discovery	26.3	\$24,985.00	\$23,538.50
				6 - Pleadings, Briefs and Legal Research	295.5	\$280,725.00	\$264,472.50
				7 - Court Appearances and Preparation	8.4	\$7,980.00	\$7,518.00
				8 - Experts/Consultants	9.8	\$9,310.00	\$8,771.00
					369.6	\$351,120.00	\$330,792.00
Kessler Topaz Meltzer & Check, LLP	WHITMAN, JOHNSTON (Partner)	\$950.00	\$895.00	3 - Case Management and Litigation Strategy	5.2	\$4,940.00	\$4,654.00
				6 - Pleadings, Briefs and Legal Research	18.3	\$17,385.00	\$16,378.50
					23.5	\$22,325.00	\$21,032.50
Kessler Topaz Meltzer & Check, LLP	WINCHESTER, ROBIN (Partner)	\$1,145.00	\$895.00	3 - Case Management and Litigation Strategy	5.1	\$5,839.50	\$4,564.50
				4 - Discovery	0.5	\$572.50	\$447.50
					5.6	\$6,412.00	\$5,012.00
Kessler Topaz Meltzer & Check, LLP	WOTRING, JULIE (Paralegal)	\$275.00	\$275.00	6 - Pleadings, Briefs and Legal Research	32	\$8,800.00	\$8,800.00
					32	\$8,800.00	\$8,800.00
Kessler Topaz Meltzer & Check, LLP	YEATES, MELISSA (Partner)	\$1,145.00	\$895.00	3 - Case Management and Litigation Strategy	1.5	\$1,717.50	\$1,342.50
				4 - Discovery	12.5	\$14,312.50	\$11,187.50
				12 - Settlement	3.6	\$4,122.00	\$3,222.00
					17.6	\$20,152.00	\$15,752.00
Law Offices of Richard M. Hagstrom	HAGSTROM, RICHARD (Partner)	\$980.00	\$895.00	3 - Case Management and Litigation Strategy	2.3	\$2,254.00	\$2,058.50
				4 - Discovery	4	\$3,920.00	\$3,580.00
					6.3	\$6,174.00	\$5,638.50

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
Levi & Korsinsky, LLP	KORSINSKY, EDUARD (Partner)	\$1,050.00	\$895.00	2 - Investigations and Factual Research	0.2	\$210.00	\$179.00
				3 - Case Management and Litigation Strategy	0.4	\$420.00	\$358.00
				6 - Pleadings, Briefs and Legal Research	0.9	\$945.00	\$805.50
					1.5	\$1,575.00	\$1,342.50
Levi & Korsinsky, LLP	LEVI, JOSEPH (Partner)	\$1,050.00	\$895.00	2 - Investigations and Factual Research	4.2	\$4,410.00	\$3,759.00
				3 - Case Management and Litigation Strategy	0.2	\$210.00	\$179.00
				7 - Court Appearances and Preparation	22.9	\$24,045.00	\$20,495.50
					27.3	\$28,665.00	\$24,433.50
Levi & Korsinsky, LLP	MACCARONE, COURTNEY (Associate)	\$675.00	\$415.00	5 - Document Review	0.5	\$337.50	\$207.50
					0.5	\$337.50	\$207.50
Levi & Korsinsky, LLP	MACCARONE, COURTNEY (Associate)	\$675.00	\$600.00	2 - Investigations and Factual Research	4.5	\$3,037.50	\$2,700.00
				3 - Case Management and Litigation Strategy	85.6	\$57,780.00	\$51,360.00
				6 - Pleadings, Briefs and Legal Research	48.6	\$32,805.00	\$29,160.00
					138.7	\$93,622.50	\$83,220.00
Levi & Korsinsky, LLP	MAH, ROSANNE (Partner)	\$740.00	\$740.00	2 - Investigations and Factual Research	0.8	\$592.00	\$592.00
				3 - Case Management and Litigation Strategy	42.2	\$31,228.00	\$31,228.00
				6 - Pleadings, Briefs and Legal Research	112.7	\$83,398.00	\$83,398.00
					155.7	\$115,218.00	\$115,218.00
Levi & Korsinsky, LLP	MESSINA, RYAN (Staff Attorney)	\$500.00	\$415.00	5 - Document Review	2.1	\$1,050.00	\$871.50
					2.1	\$1,050.00	\$871.50
Levi & Korsinsky, LLP	RIVAS, ROSEMARY (Partner)	\$995.00	\$415.00	5 - Document Review	1.2	\$1,194.00	\$498.00
					1.2	\$1,194.00	\$498.00
Levi & Korsinsky, LLP	RIVAS, ROSEMARY (Partner)	\$995.00	\$895.00	2 - Investigations and Factual Research	18.5	\$18,407.50	\$16,557.50
				3 - Case Management and Litigation Strategy	19.8	\$19,701.00	\$17,721.00
				4 - Discovery	5	\$4,975.00	\$4,475.00
				6 - Pleadings, Briefs and Legal Research	93.2	\$92,734.00	\$83,414.00
				7 - Court Appearances and Preparation	24.9	\$24,775.50	\$22,285.50
					161.4	\$160,593.00	\$144,453.00
Levi & Korsinsky, LLP	SCHMITT, CHRISTOPHER (Staff Attorney)	\$475.00	\$415.00	3 - Case Management and Litigation Strategy	23.7	\$11,257.50	\$9,835.50
				6 - Pleadings, Briefs and Legal Research	5.7	\$2,707.50	\$2,365.50
					29.4	\$13,965.00	\$12,201.00
Lieff Cabraser Heimann & Bernstein, LLP	ANTHONY, RICHARD (Paralegal)	\$535.00	\$275.00	3 - Case Management and Litigation Strategy	0.5	\$267.50	\$137.50
				5 - Document Review	7.9	\$4,226.50	\$2,172.50
					8.4	\$4,494.00	\$2,310.00
Lieff Cabraser Heimann & Bernstein, LLP	ARSOV, DUSHAN (Paralegal)	\$515.00	\$275.00	1 - Lead Counsel Duties	0.6	\$309.00	\$165.00
				3 - Case Management and Litigation Strategy	139.1	\$71,636.50	\$38,252.50
				4 - Discovery	4.8	\$2,472.00	\$1,320.00
				5 - Document Review	0.3	\$154.50	\$82.50
				6 - Pleadings, Briefs and Legal Research	8.4	\$4,326.00	\$2,310.00
				12 - Settlement	7.1	\$3,656.50	\$1,952.50
					160.3	\$82,554.50	\$44,082.50

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
Lieff Cabraser Heimann & Bernstein, LLP	ATKINS, CECILIA (Paralegal)	\$360.00	\$275.00	6 - Pleadings, Briefs and Legal Research	1.1	\$396.00	\$302.50
					1.1	\$396.00	\$302.50
Lieff Cabraser Heimann & Bernstein, LLP	BALKOSKI, JANE (Paralegal)	\$360.00	\$275.00	2 - Investigations and Factual Research	3.6	\$1,296.00	\$990.00
				3 - Case Management and Litigation Strategy	30.2	\$10,872.00	\$8,305.00
				4 - Discovery	0.5	\$180.00	\$137.50
				6 - Pleadings, Briefs and Legal Research	8.8	\$3,168.00	\$2,420.00
				7 - Court Appearances and Preparation	6.1	\$2,196.00	\$1,677.50
					49.2	\$17,712.00	\$13,530.00
Lieff Cabraser Heimann & Bernstein, LLP	BAYRON, ERICA (Paralegal)	\$510.00	\$275.00	3 - Case Management and Litigation Strategy	61	\$31,110.00	\$16,775.00
					61	\$31,110.00	\$16,775.00
Lieff Cabraser Heimann & Bernstein, LLP	BEHRMANN, DAWN (Paralegal)	\$405.00	\$275.00	3 - Case Management and Litigation Strategy	3.5	\$1,417.50	\$962.50
					3.5	\$1,417.50	\$962.50
Lieff Cabraser Heimann & Bernstein, LLP	BELUSHKO BARROWS, NIKKI (Paralegal)	\$535.00	\$275.00	2 - Investigations and Factual Research	11	\$5,885.00	\$3,025.00
				3 - Case Management and Litigation Strategy	1.7	\$909.50	\$467.50
				4 - Discovery	0.9	\$481.50	\$247.50
				6 - Pleadings, Briefs and Legal Research	10.3	\$5,510.50	\$2,832.50
				8 - Experts/Consultants	0.5	\$267.50	\$137.50
					24.4	\$13,054.00	\$6,710.00
Lieff Cabraser Heimann & Bernstein, LLP	BERTRAM, ANNE (Paralegal)	\$360.00	\$275.00	1 - Lead Counsel Duties	4.2	\$1,512.00	\$1,155.00
				2 - Investigations and Factual Research	5.3	\$1,908.00	\$1,457.50
				3 - Case Management and Litigation Strategy	40.8	\$14,688.00	\$11,220.00
				4 - Discovery	10.5	\$3,780.00	\$2,887.50
				6 - Pleadings, Briefs and Legal Research	103.3	\$37,188.00	\$28,407.50
				8 - Experts/Consultants	0.3	\$108.00	\$82.50
					164.4	\$59,184.00	\$45,210.00
Lieff Cabraser Heimann & Bernstein, LLP	BILKISS, ABBY (Staff Attorney)	\$655.00	\$415.00	3 - Case Management and Litigation Strategy	11	\$7,205.00	\$4,565.00
				4 - Discovery	8.5	\$5,567.50	\$3,527.50
				5 - Document Review	381	\$249,555.00	\$158,115.00
					400.5	\$262,327.50	\$166,207.50
Lieff Cabraser Heimann & Bernstein, LLP	BROWN, AIDAN (Paralegal)	\$525.00	\$275.00	1 - Lead Counsel Duties	1.5	\$787.50	\$412.50
				2 - Investigations and Factual Research	53.7	\$28,192.50	\$14,767.50
				3 - Case Management and Litigation Strategy	351.8	\$184,695.00	\$96,745.00
				4 - Discovery	141.4	\$74,235.00	\$38,885.00
				6 - Pleadings, Briefs and Legal Research	82.5	\$43,312.50	\$22,687.50
				7 - Court Appearances and Preparation	17.9	\$9,397.50	\$4,922.50
				12 - Settlement	3.2	\$1,680.00	\$880.00
					652	\$342,300.00	\$179,300.00
Lieff Cabraser Heimann & Bernstein, LLP	BUDNER, KEVIN (Partner)	\$880.00	\$880.00	3 - Case Management and Litigation Strategy	0.8	\$704.00	\$704.00
				6 - Pleadings, Briefs and Legal Research	2.4	\$2,112.00	\$2,112.00
					3.2	\$2,816.00	\$2,816.00
Lieff Cabraser Heimann & Bernstein, LLP	CABRASER, ELIZABETH (Partner)	\$1,740.00	\$895.00	2 - Investigations and Factual Research	3.3	\$5,742.00	\$2,953.50

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
				3 - Case Management and Litigation Strategy	0.9	\$1,566.00	\$805.50
					4.2	\$7,308.00	\$3,759.00
Lieff Cabraser Heimann & Bernstein, LLP	CALANGIAN, MARGIE (Paralegal)	\$565.00	\$275.00	1 - Lead Counsel Duties	0.2	\$113.00	\$55.00
				2 - Investigations and Factual Research	0.5	\$282.50	\$137.50
				3 - Case Management and Litigation Strategy	44.6	\$25,199.00	\$12,265.00
				4 - Discovery	105.4	\$59,551.00	\$28,985.00
				5 - Document Review	24.4	\$13,786.00	\$6,710.00
					175.1	\$98,931.50	\$48,152.50
Lieff Cabraser Heimann & Bernstein, LLP	CHINN, VICTORIA (Staff Attorney)	\$655.00	\$415.00	1 - Lead Counsel Duties	3.1	\$2,030.50	\$1,286.50
				3 - Case Management and Litigation Strategy	0.5	\$327.50	\$207.50
				4 - Discovery	760.2	\$497,931.00	\$315,483.00
				5 - Document Review	1816.6	\$1,189,873.00	\$753,889.00
				6 - Pleadings, Briefs and Legal Research	16.8	\$11,004.00	\$6,972.00
				8 - Experts/Consultants	1.6	\$1,048.00	\$664.00
					2598.8	\$1,702,214.00	\$1,078,502.00
Lieff Cabraser Heimann & Bernstein, LLP	CHIPLOCK, DANIEL (Partner)	\$1,260.00	\$895.00	3 - Case Management and Litigation Strategy	2.2	\$2,772.00	\$1,969.00
					2.2	\$2,772.00	\$1,969.00
Lieff Cabraser Heimann & Bernstein, LLP	DESAI, NIMISH (Partner)	\$1,115.00	\$895.00	1 - Lead Counsel Duties	1.6	\$1,784.00	\$1,432.00
				2 - Investigations and Factual Research	1.6	\$1,784.00	\$1,432.00
				3 - Case Management and Litigation Strategy	38.1	\$42,481.50	\$34,099.50
				4 - Discovery	2.4	\$2,676.00	\$2,148.00
				6 - Pleadings, Briefs and Legal Research	21.6	\$24,084.00	\$19,332.00
				7 - Court Appearances and Preparation	0.7	\$780.50	\$626.50
				8 - Experts/Consultants	159.1	\$177,396.50	\$142,394.50
				12 - Settlement	19.2	\$21,408.00	\$17,184.00
					244.3	\$272,394.50	\$218,648.50
Lieff Cabraser Heimann & Bernstein, LLP	EDEN, NICA (Paralegal)	\$480.00	\$275.00	6 - Pleadings, Briefs and Legal Research	1.4	\$672.00	\$385.00
					1.4	\$672.00	\$385.00
Lieff Cabraser Heimann & Bernstein, LLP	GEISSLER, ROGER (Staff Attorney)	\$630.00	\$415.00	3 - Case Management and Litigation Strategy	1	\$630.00	\$415.00
				4 - Discovery	7.5	\$4,725.00	\$3,112.50
				5 - Document Review	1706.2	\$1,074,906.00	\$708,073.00
					1714.7	\$1,080,261.00	\$711,600.50
Lieff Cabraser Heimann & Bernstein, LLP	GRANT, ANTHONY (Paralegal)	\$565.00	\$275.00	3 - Case Management and Litigation Strategy	1.4	\$791.00	\$385.00
				4 - Discovery	164.5	\$92,942.50	\$45,237.50
				5 - Document Review	97	\$54,805.00	\$26,675.00
					262.9	\$148,538.50	\$72,297.50
Lieff Cabraser Heimann & Bernstein, LLP	GRIFFITH, SPENCER (Paralegal)	\$405.00	\$275.00	3 - Case Management and Litigation Strategy	5.5	\$2,227.50	\$1,512.50
					5.5	\$2,227.50	\$1,512.50
Lieff Cabraser Heimann & Bernstein, LLP	JONES, KAREN (Staff Attorney)	\$655.00	\$415.00	3 - Case Management and Litigation Strategy	3	\$1,965.00	\$1,245.00
				5 - Document Review	161.4	\$105,717.00	\$66,981.00
					164.4	\$107,682.00	\$68,226.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar				
Lieff Cabraser Heimann & Bernstein, LLP	JORDAN, CHRISTOPHER (Staff Attorney)	\$630.00	\$415.00	1 - Lead Counsel Duties	4.5	\$2,835.00	\$1,867.50				
				3 - Case Management and Litigation Strategy	14.1	\$8,883.00	\$5,851.50				
				4 - Discovery	23.8	\$14,994.00	\$9,877.00				
				5 - Document Review	3656.6	\$2,303,658.00	\$1,517,489.00				
					3699	\$2,330,370.00	\$1,535,085.00				
Lieff Cabraser Heimann & Bernstein, LLP	KAWAMURA, JENNIFER (Paralegal)	\$540.00	\$275.00	1 - Lead Counsel Duties	0.6	\$324.00	\$165.00				
				3 - Case Management and Litigation Strategy	0.4	\$216.00	\$110.00				
				6 - Pleadings, Briefs and Legal Research	19.2	\$10,368.00	\$5,280.00				
					20.2	\$10,908.00	\$5,555.00				
Lieff Cabraser Heimann & Bernstein, LLP	KEENLEY, ELIZABETH (Paralegal)	\$540.00	\$275.00	6 - Pleadings, Briefs and Legal Research	1.4	\$756.00	\$385.00				
					1.4	\$756.00	\$385.00				
Lieff Cabraser Heimann & Bernstein, LLP	KENFIELD-KELLEHER, MURIEL (Associate)	\$655.00	\$415.00	5 - Document Review	46.5	\$30,457.50	\$19,297.50				
					46.5	\$30,457.50	\$19,297.50				
Lieff Cabraser Heimann & Bernstein, LLP	KENFIELD-KELLEHER, MURIEL (Associate)	\$655.00	\$600.00	1 - Lead Counsel Duties	9.6	\$6,288.00	\$5,760.00				
				2 - Investigations and Factual Research	5.3	\$3,471.50	\$3,180.00				
				3 - Case Management and Litigation Strategy	65.1	\$42,640.50	\$39,060.00				
				4 - Discovery	634	\$415,270.00	\$380,400.00				
				6 - Pleadings, Briefs and Legal Research	468	\$306,540.00	\$280,800.00				
				7 - Court Appearances and Preparation	5.7	\$3,733.50	\$3,420.00				
				8 - Experts/Consultants	3.2	\$2,096.00	\$1,920.00				
				11 - Appeal	0.5	\$327.50	\$300.00				
				12 - Settlement	34.9	\$22,859.50	\$20,940.00				
					1226.3	\$803,226.50	\$735,780.00				
				Lieff Cabraser Heimann & Bernstein, LLP	KIM, SUN (Contract Attorney)	\$630.00	\$415.00	5 - Document Review	256	\$161,280.00	\$106,240.00
									256	\$161,280.00	\$106,240.00
Lieff Cabraser Heimann & Bernstein, LLP	KIM, SUN (Contract Attorney)	\$630.00	\$630.00	4 - Discovery	29.9	\$18,837.00	\$18,837.00				
					29.9	\$18,837.00	\$18,837.00				
Lieff Cabraser Heimann & Bernstein, LLP	KRAVATZ, JILLIAN (Paralegal)	\$415.00	\$275.00	3 - Case Management and Litigation Strategy	12.4	\$5,146.00	\$3,410.00				
				4 - Discovery	11.2	\$4,648.00	\$3,080.00				
				6 - Pleadings, Briefs and Legal Research	9	\$3,735.00	\$2,475.00				
					32.6	\$13,529.00	\$8,965.00				
Lieff Cabraser Heimann & Bernstein, LLP	KRUGER, ERIK (Paralegal)	\$540.00	\$275.00	3 - Case Management and Litigation Strategy	26.2	\$14,148.00	\$7,205.00				
				4 - Discovery	1.3	\$702.00	\$357.50				
				6 - Pleadings, Briefs and Legal Research	16.1	\$8,694.00	\$4,427.50				
					43.6	\$23,544.00	\$11,990.00				
Lieff Cabraser Heimann & Bernstein, LLP	LICHTMAN, JASON (Partner)	\$1,080.00	\$895.00	2 - Investigations and Factual Research	1.4	\$1,512.00	\$1,253.00				
				3 - Case Management and Litigation Strategy	5.6	\$6,048.00	\$5,012.00				
				4 - Discovery	4.1	\$4,428.00	\$3,669.50				
				6 - Pleadings, Briefs and Legal Research	1.4	\$1,512.00	\$1,253.00				
				8 - Experts/Consultants	74.8	\$80,784.00	\$66,946.00				
	87.3	\$94,284.00	\$78,133.50								

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
Lieff Cabraser Heimann & Bernstein, LLP	LIM, SOOKYUNG (Contract Attorney)	\$525.00	\$415.00	5 - Document Review	281.5	\$147,787.50	\$116,822.50
					281.5	\$147,787.50	\$116,822.50
Lieff Cabraser Heimann & Bernstein, LLP	LIM, SOOKYUNG (Contract Attorney)	\$525.00	\$525.00	4 - Discovery	14.5	\$7,612.50	\$7,612.50
					14.5	\$7,612.50	\$7,612.50
Lieff Cabraser Heimann & Bernstein, LLP	LIM, TRACY (Paralegal)	\$465.00	\$275.00	2 - Investigations and Factual Research	0.8	\$372.00	\$220.00
				3 - Case Management and Litigation Strategy	14.5	\$6,742.50	\$3,987.50
				4 - Discovery	0.2	\$93.00	\$55.00
				6 - Pleadings, Briefs and Legal Research	6	\$2,790.00	\$1,650.00
					21.5	\$9,997.50	\$5,912.50
Lieff Cabraser Heimann & Bernstein, LLP	MACATEE, MARK (Paralegal)	\$540.00	\$275.00	1 - Lead Counsel Duties	70.5	\$38,070.00	\$19,387.50
				3 - Case Management and Litigation Strategy	0.3	\$162.00	\$82.50
					70.8	\$38,232.00	\$19,470.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Associate)	\$820.00	\$415.00	5 - Document Review	13.3	\$10,906.00	\$5,519.50
					13.3	\$10,906.00	\$5,519.50
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Associate)	\$820.00	\$600.00	1 - Lead Counsel Duties	19.7	\$16,154.00	\$11,820.00
				2 - Investigations and Factual Research	22	\$18,040.00	\$13,200.00
				3 - Case Management and Litigation Strategy	176.4	\$144,648.00	\$105,840.00
				4 - Discovery	281.6	\$230,912.00	\$168,960.00
				6 - Pleadings, Briefs and Legal Research	950.5	\$779,410.00	\$570,300.00
				7 - Court Appearances and Preparation	93.1	\$76,342.00	\$55,860.00
				8 - Experts/Consultants	9.7	\$7,954.00	\$5,820.00
				12 - Settlement	35.7	\$29,274.00	\$21,420.00
					1588.7	\$1,302,734.00	\$953,220.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Partner)	\$820.00	\$415.00	5 - Document Review	11.2	\$9,184.00	\$4,648.00
					11.2	\$9,184.00	\$4,648.00
Lieff Cabraser Heimann & Bernstein, LLP	MCBRIDE, KATHERINE (Partner)	\$820.00	\$820.00	1 - Lead Counsel Duties	130.9	\$107,338.00	\$107,338.00
				2 - Investigations and Factual Research	12.3	\$10,086.00	\$10,086.00
				3 - Case Management and Litigation Strategy	152.2	\$124,804.00	\$124,804.00
				4 - Discovery	347.2	\$284,704.00	\$284,704.00
				6 - Pleadings, Briefs and Legal Research	436.4	\$357,848.00	\$357,848.00
				7 - Court Appearances and Preparation	93.5	\$76,670.00	\$76,670.00
				8 - Experts/Consultants	9.1	\$7,462.00	\$7,462.00
				11 - Appeal	55.6	\$45,592.00	\$45,592.00
				12 - Settlement	371.9	\$304,958.00	\$304,958.00
					1609.1	\$1,319,462.00	\$1,319,462.00
Lieff Cabraser Heimann & Bernstein, LLP	MICLUT, ANDREEA (Staff Attorney)	\$630.00	\$415.00	2 - Investigations and Factual Research	284.8	\$179,424.00	\$118,192.00
				3 - Case Management and Litigation Strategy	3.4	\$2,142.00	\$1,411.00
					288.2	\$181,566.00	\$119,603.00
Lieff Cabraser Heimann & Bernstein, LLP	MILORO, SCOTT (Staff Attorney)	\$655.00	\$415.00	2 - Investigations and Factual Research	74.8	\$48,994.00	\$31,042.00
				3 - Case Management and Litigation Strategy	146.5	\$95,957.50	\$60,797.50
				4 - Discovery	13.1	\$8,580.50	\$5,436.50

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
				5 - Document Review	4978.9	\$3,261,179.50	\$2,066,243.50
				6 - Pleadings, Briefs and Legal Research	22.9	\$14,999.50	\$9,503.50
				8 - Experts/Consultants	121.7	\$79,713.50	\$50,505.50
					5357.9	\$3,509,424.50	\$2,223,528.50
Lieff Cabraser Heimann & Bernstein, LLP	MUKHERJI, RENEE (Paralegal)	\$565.00	\$275.00	2 - Investigations and Factual Research	1.6	\$904.00	\$440.00
				6 - Pleadings, Briefs and Legal Research	0.9	\$508.50	\$247.50
					2.5	\$1,412.50	\$687.50
Lieff Cabraser Heimann & Bernstein, LLP	MUNOZ, CHRISTOPHER (Paralegal)	\$540.00	\$275.00	1 - Lead Counsel Duties	92.3	\$49,842.00	\$25,382.50
					92.3	\$49,842.00	\$25,382.50
Lieff Cabraser Heimann & Bernstein, LLP	NEE, MAYA (Paralegal)	\$455.00	\$275.00	3 - Case Management and Litigation Strategy	48.9	\$22,249.50	\$13,447.50
					48.9	\$22,249.50	\$13,447.50
Lieff Cabraser Heimann & Bernstein, LLP	NGUYEN, PHONG-CHAU (Partner)	\$880.00	\$415.00	5 - Document Review	0.2	\$176.00	\$83.00
					0.2	\$176.00	\$83.00
Lieff Cabraser Heimann & Bernstein, LLP	NGUYEN, PHONG-CHAU (Partner)	\$880.00	\$880.00	1 - Lead Counsel Duties	79.7	\$70,136.00	\$70,136.00
				2 - Investigations and Factual Research	8.2	\$7,216.00	\$7,216.00
				3 - Case Management and Litigation Strategy	223.2	\$196,416.00	\$196,416.00
				4 - Discovery	327.2	\$287,936.00	\$287,936.00
				6 - Pleadings, Briefs and Legal Research	455.7	\$401,016.00	\$401,016.00
				7 - Court Appearances and Preparation	81.7	\$71,896.00	\$71,896.00
				8 - Experts/Consultants	7.4	\$6,512.00	\$6,512.00
				11 - Appeal	36.6	\$32,208.00	\$32,208.00
				12 - Settlement	348.9	\$307,032.00	\$307,032.00
					1568.6	\$1,380,368.00	\$1,380,368.00
Lieff Cabraser Heimann & Bernstein, LLP	NICOLAOU, JOHN (Partner)	\$880.00	\$415.00	5 - Document Review	275.4	\$242,352.00	\$114,291.00
					275.4	\$242,352.00	\$114,291.00
Lieff Cabraser Heimann & Bernstein, LLP	NICOLAOU, JOHN (Partner)	\$880.00	\$880.00	1 - Lead Counsel Duties	13.5	\$11,880.00	\$11,880.00
				2 - Investigations and Factual Research	54.6	\$48,048.00	\$48,048.00
				3 - Case Management and Litigation Strategy	502	\$441,760.00	\$441,760.00
				4 - Discovery	1056.8	\$929,984.00	\$929,984.00
				6 - Pleadings, Briefs and Legal Research	2756.4	\$2,425,632.00	\$2,425,632.00
				7 - Court Appearances and Preparation	280.1	\$246,488.00	\$246,488.00
				8 - Experts/Consultants	277.2	\$243,936.00	\$243,936.00
				12 - Settlement	113.1	\$99,528.00	\$99,528.00
					5053.7	\$4,447,256.00	\$4,447,256.00
Lieff Cabraser Heimann & Bernstein, LLP	OH, MARISSA (Staff Attorney)	\$630.00	\$415.00	4 - Discovery	766.2	\$482,706.00	\$317,973.00
				5 - Document Review	3870.7	\$2,438,541.00	\$1,606,340.50
				8 - Experts/Consultants	10.5	\$6,615.00	\$4,357.50
					4647.4	\$2,927,862.00	\$1,928,671.00
Lieff Cabraser Heimann & Bernstein, LLP	ORSLAND, KRISTIN (Paralegal)	\$540.00	\$275.00	6 - Pleadings, Briefs and Legal Research	14.3	\$7,722.00	\$3,932.50
					14.3	\$7,722.00	\$3,932.50
Lieff Cabraser Heimann & Bernstein, LLP	OXMAN, ELLY (Paralegal)	\$565.00	\$275.00	4 - Discovery	17.5	\$9,887.50	\$4,812.50

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
				5 - Document Review	33.8	\$19,097.00	\$9,295.00
					51.3	\$28,984.50	\$14,107.50
Lieff Cabraser Heimann & Bernstein, LLP	PUSTILNIK, ALIX (Staff Attorney)	\$415.00	\$415.00	3 - Case Management and Litigation Strategy	8.9	\$3,693.50	\$3,693.50
				4 - Discovery	396	\$164,340.00	\$164,340.00
					404.9	\$168,033.50	\$168,033.50
Lieff Cabraser Heimann & Bernstein, LLP	QUISPE, COYA (Paralegal)	\$515.00	\$275.00	2 - Investigations and Factual Research	5	\$2,575.00	\$1,375.00
					5	\$2,575.00	\$1,375.00
Lieff Cabraser Heimann & Bernstein, LLP	RAHIMI, FAWAD (Paralegal)	\$565.00	\$275.00	3 - Case Management and Litigation Strategy	36.9	\$20,848.50	\$10,147.50
				4 - Discovery	145.3	\$82,094.50	\$39,957.50
				5 - Document Review	25.8	\$14,577.00	\$7,095.00
					208	\$117,520.00	\$57,200.00
Lieff Cabraser Heimann & Bernstein, LLP	RUDNICK, JENNIFER (Paralegal)	\$535.00	\$275.00	2 - Investigations and Factual Research	3.4	\$1,819.00	\$935.00
				3 - Case Management and Litigation Strategy	2.5	\$1,337.50	\$687.50
				6 - Pleadings, Briefs and Legal Research	22.4	\$11,984.00	\$6,160.00
				12 - Settlement	1.5	\$802.50	\$412.50
					29.8	\$15,943.00	\$8,195.00
Lieff Cabraser Heimann & Bernstein, LLP	SABBE, JENNIFER (Paralegal)	\$565.00	\$275.00	6 - Pleadings, Briefs and Legal Research	1.6	\$904.00	\$440.00
					1.6	\$904.00	\$440.00
Lieff Cabraser Heimann & Bernstein, LLP	SELHORST, HANNAH (Paralegal)	\$395.00	\$275.00	2 - Investigations and Factual Research	2.3	\$908.50	\$632.50
				3 - Case Management and Litigation Strategy	19	\$7,505.00	\$5,225.00
				6 - Pleadings, Briefs and Legal Research	26.2	\$10,349.00	\$7,205.00
					47.5	\$18,762.50	\$13,062.50
Lieff Cabraser Heimann & Bernstein, LLP	SHINDELBOWER, JERRY (Staff Attorney)	\$630.00	\$415.00	5 - Document Review	40	\$25,200.00	\$16,600.00
					40	\$25,200.00	\$16,600.00
Lieff Cabraser Heimann & Bernstein, LLP	SIDDIQI, NABILA (Paralegal)	\$535.00	\$275.00	2 - Investigations and Factual Research	2.3	\$1,230.50	\$632.50
				6 - Pleadings, Briefs and Legal Research	0.8	\$428.00	\$220.00
				8 - Experts/Consultants	0.4	\$214.00	\$110.00
					3.5	\$1,872.50	\$962.50
Lieff Cabraser Heimann & Bernstein, LLP	STELLINGS, DAVID (Partner)	\$1,440.00	\$895.00	1 - Lead Counsel Duties	99.7	\$143,568.00	\$89,231.50
				2 - Investigations and Factual Research	9.4	\$13,536.00	\$8,413.00
				3 - Case Management and Litigation Strategy	1102	\$1,586,880.00	\$986,290.00
				4 - Discovery	156.8	\$225,792.00	\$140,336.00
				6 - Pleadings, Briefs and Legal Research	222.2	\$319,968.00	\$198,869.00
				7 - Court Appearances and Preparation	301.4	\$434,016.00	\$269,753.00
				8 - Experts/Consultants	18.8	\$27,072.00	\$16,826.00
				12 - Settlement	572.8	\$824,832.00	\$512,656.00
					2483.1	\$3,575,664.00	\$2,222,374.50
Lieff Cabraser Heimann & Bernstein, LLP	TARPEH, JLE (Paralegal)	\$540.00	\$275.00	1 - Lead Counsel Duties	3.3	\$1,782.00	\$907.50
				2 - Investigations and Factual Research	205.7	\$111,078.00	\$56,567.50
				3 - Case Management and Litigation Strategy	281.6	\$152,064.00	\$77,440.00
				4 - Discovery	26.3	\$14,202.00	\$7,232.50

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper
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Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
				6 - Pleadings, Briefs and Legal Research	74.3	\$40,122.00	\$20,432.50
					591.2	\$319,248.00	\$162,580.00
Lieff Cabraser Heimann & Bernstein, LLP	TEXIER, MUNA (Paralegal)	\$565.00	\$275.00	3 - Case Management and Litigation Strategy	7.3	\$4,124.50	\$2,007.50
				4 - Discovery	48.5	\$27,402.50	\$13,337.50
				5 - Document Review	87.9	\$49,663.50	\$24,172.50
					143.7	\$81,190.50	\$39,517.50
Lieff Cabraser Heimann & Bernstein, LLP	TEXIER, RICHARD (Paralegal)	\$540.00	\$275.00	6 - Pleadings, Briefs and Legal Research	4.8	\$2,592.00	\$1,320.00
					4.8	\$2,592.00	\$1,320.00
Lieff Cabraser Heimann & Bernstein, LLP	TOLLAFIELD, STEPHEN (Paralegal)	\$540.00	\$275.00	11 - Appeal	2.2	\$1,188.00	\$605.00
				12 - Settlement	2	\$1,080.00	\$550.00
					4.2	\$2,268.00	\$1,155.00
Lieff Cabraser Heimann & Bernstein, LLP	TROUVAIS, BENJAMIN (Paralegal)	\$585.00	\$275.00	2 - Investigations and Factual Research	10	\$5,850.00	\$2,750.00
				6 - Pleadings, Briefs and Legal Research	11.9	\$6,961.50	\$3,272.50
					21.9	\$12,811.50	\$6,022.50
Lieff Cabraser Heimann & Bernstein, LLP	TROXEL, BRIAN (Paralegal)	\$540.00	\$275.00	6 - Pleadings, Briefs and Legal Research	30.1	\$16,254.00	\$8,277.50
					30.1	\$16,254.00	\$8,277.50
Lieff Cabraser Heimann & Bernstein, LLP	UY, KATRINA (Paralegal)	\$535.00	\$275.00	2 - Investigations and Factual Research	1.8	\$963.00	\$495.00
					1.8	\$963.00	\$495.00
Lieff Cabraser Heimann & Bernstein, LLP	WILLIN, MITCHELL (Paralegal)	\$540.00	\$275.00	1 - Lead Counsel Duties	79.3	\$42,822.00	\$21,807.50
				2 - Investigations and Factual Research	146.3	\$79,002.00	\$40,232.50
				3 - Case Management and Litigation Strategy	2	\$1,080.00	\$550.00
					227.6	\$122,904.00	\$62,590.00
Podhurst Orseck, P.A.	CLAVELO, TAILYN (Staff Attorney)	\$445.00	\$415.00	6 - Pleadings, Briefs and Legal Research	82.5	\$36,712.50	\$34,237.50
					82.5	\$36,712.50	\$34,237.50
Podhurst Orseck, P.A.	DEL RIEGO, ALISSA (Associate)	\$655.00	\$600.00	3 - Case Management and Litigation Strategy	82.2	\$53,841.00	\$49,320.00
				4 - Discovery	28.5	\$18,667.50	\$17,100.00
				6 - Pleadings, Briefs and Legal Research	93.6	\$61,308.00	\$56,160.00
				7 - Court Appearances and Preparation	5.7	\$3,733.50	\$3,420.00
					210	\$137,550.00	\$126,000.00
Podhurst Orseck, P.A.	FERNANDEZ ANDES, CHRIS (Paralegal)	\$345.00	\$275.00	2 - Investigations and Factual Research	4.2	\$1,449.00	\$1,155.00
				6 - Pleadings, Briefs and Legal Research	28.9	\$9,970.50	\$7,947.50
					33.1	\$11,419.50	\$9,102.50
Podhurst Orseck, P.A.	GRAVANTE, JOHN (Partner)	\$755.00	\$415.00	5 - Document Review	1	\$755.00	\$415.00
					1	\$755.00	\$415.00
Podhurst Orseck, P.A.	GRAVANTE, JOHN (Partner)	\$755.00	\$755.00	2 - Investigations and Factual Research	4.5	\$3,397.50	\$3,397.50
				3 - Case Management and Litigation Strategy	52.7	\$39,788.50	\$39,788.50
				4 - Discovery	68.9	\$52,019.50	\$52,019.50
				6 - Pleadings, Briefs and Legal Research	101.4	\$76,557.00	\$76,557.00
				7 - Court Appearances and Preparation	3.5	\$2,642.50	\$2,642.50
				12 - Settlement	8	\$6,040.00	\$6,040.00
					239	\$180,445.00	\$180,445.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper
Page ID #: 31616

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
Podhurst Orseck, P.A.	LEVY, NATHALIE (Staff Attorney)	\$590.00	\$415.00	3 - Case Management and Litigation Strategy	20.1	\$11,859.00	\$8,341.50
				6 - Pleadings, Briefs and Legal Research	81.2	\$47,908.00	\$33,698.00
					101.3	\$59,767.00	\$42,039.50
Podhurst Orseck, P.A.	LOPEZ, ALEJANDRO (Staff Attorney)	\$590.00	\$415.00	3 - Case Management and Litigation Strategy	0.5	\$295.00	\$207.50
					0.5	\$295.00	\$207.50
Podhurst Orseck, P.A.	MARSTON, VICTORIA (Staff Attorney)	\$445.00	\$415.00	6 - Pleadings, Briefs and Legal Research	90	\$40,050.00	\$37,350.00
					90	\$40,050.00	\$37,350.00
Podhurst Orseck, P.A.	PELL, STEPHANIE (Contract Attorney)	\$445.00	\$415.00	5 - Document Review	342.2	\$152,279.00	\$142,013.00
					342.2	\$152,279.00	\$142,013.00
Podhurst Orseck, P.A.	PELL, STEPHANIE (Contract Attorney)	\$445.00	\$445.00	3 - Case Management and Litigation Strategy	33.6	\$14,952.00	\$14,952.00
				4 - Discovery	95.5	\$42,497.50	\$42,497.50
					129.1	\$57,449.50	\$57,449.50
Podhurst Orseck, P.A.	PELL, STEPHANIE (Staff Attorney)	\$445.00	\$415.00	2 - Investigations and Factual Research	0.5	\$222.50	\$207.50
				3 - Case Management and Litigation Strategy	17.5	\$7,787.50	\$7,262.50
				4 - Discovery	17	\$7,565.00	\$7,055.00
				5 - Document Review	2735.6	\$1,217,342.00	\$1,135,274.00
				6 - Pleadings, Briefs and Legal Research	97.5	\$43,387.50	\$40,462.50
				8 - Experts/Consultants	50.9	\$22,650.50	\$21,123.50
					2919	\$1,298,955.00	\$1,211,385.00
Podhurst Orseck, P.A.	PENELAS, CHRISTOPHER (Paralegal)	\$345.00	\$275.00	2 - Investigations and Factual Research	4.4	\$1,518.00	\$1,210.00
				6 - Pleadings, Briefs and Legal Research	14.4	\$4,968.00	\$3,960.00
					18.8	\$6,486.00	\$5,170.00
Podhurst Orseck, P.A.	PRIETO, PETER (Partner)	\$1,275.00	\$415.00	5 - Document Review	0.5	\$637.50	\$207.50
					0.5	\$637.50	\$207.50
Podhurst Orseck, P.A.	PRIETO, PETER (Partner)	\$1,275.00	\$895.00	3 - Case Management and Litigation Strategy	16.8	\$21,420.00	\$15,036.00
				4 - Discovery	1.5	\$1,912.50	\$1,342.50
				6 - Pleadings, Briefs and Legal Research	11.3	\$14,407.50	\$10,113.50
				7 - Court Appearances and Preparation	2.7	\$3,442.50	\$2,416.50
				12 - Settlement	1.5	\$1,912.50	\$1,342.50
					33.8	\$43,095.00	\$30,251.00
Podhurst Orseck, P.A.	RAFAELI, JOEY (Staff Attorney)	\$590.00	\$415.00	6 - Pleadings, Briefs and Legal Research	34.7	\$20,473.00	\$14,400.50
					34.7	\$20,473.00	\$14,400.50
Podhurst Orseck, P.A.	SPULAK, MATT (Staff Attorney)	\$755.00	\$415.00	5 - Document Review	5	\$3,775.00	\$2,075.00
				6 - Pleadings, Briefs and Legal Research	77	\$58,135.00	\$31,955.00
					82	\$61,910.00	\$34,030.00
Podhurst Orseck, P.A.	WAHAB, CHAFIC (Staff Attorney)	\$590.00	\$415.00	6 - Pleadings, Briefs and Legal Research	120.2	\$70,918.00	\$49,883.00
					120.2	\$70,918.00	\$49,883.00
Podhurst Orseck, P.A.	WEINSHALL, MATTHEW (Partner)	\$895.00	\$895.00	11 - Appeal	58	\$51,910.00	\$51,910.00
					58	\$51,910.00	\$51,910.00
Podhurst Orseck, P.A.	WEINSHALL, MATT (Partner)	\$755.00	\$755.00	3 - Case Management and Litigation Strategy	8.2	\$6,191.00	\$6,191.00
				4 - Discovery	0.5	\$377.50	\$377.50

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

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Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
				6 - Pleadings, Briefs and Legal Research	96.9	\$73,159.50	\$73,159.50
				7 - Court Appearances and Preparation	2.7	\$2,038.50	\$2,038.50
				12 - Settlement	1.5	\$1,132.50	\$1,132.50
					109.8	\$82,899.00	\$82,899.00
Podhurst Orseck, P.A.	YARZABAL, ILIANA (Paralegal)	\$345.00	\$275.00	2 - Investigations and Factual Research	5.8	\$2,001.00	\$1,595.00
				3 - Case Management and Litigation Strategy	168.8	\$58,236.00	\$46,420.00
				4 - Discovery	95.7	\$33,016.50	\$26,317.50
				6 - Pleadings, Briefs and Legal Research	18	\$6,210.00	\$4,950.00
				12 - Settlement	3.6	\$1,242.00	\$990.00
					291.9	\$100,705.50	\$80,272.50
Pritzker Levine LLP	CARACUZZO, BETHANY (Partner)	\$950.00	\$895.00	3 - Case Management and Litigation Strategy	8.6	\$8,170.00	\$7,697.00
				6 - Pleadings, Briefs and Legal Research	29.5	\$28,025.00	\$26,402.50
					38.1	\$36,195.00	\$34,099.50
Pritzker Levine LLP	CORBITT, CAROLINE (Associate)	\$725.00	\$600.00	2 - Investigations and Factual Research	0.7	\$507.50	\$420.00
				3 - Case Management and Litigation Strategy	12.7	\$9,207.50	\$7,620.00
				6 - Pleadings, Briefs and Legal Research	8.4	\$6,090.00	\$5,040.00
					21.8	\$15,805.00	\$13,080.00
Pritzker Levine LLP	DOWALIBY, JOANNA (Paralegal)	\$295.00	\$275.00	3 - Case Management and Litigation Strategy	2	\$590.00	\$550.00
					2	\$590.00	\$550.00
Pritzker Levine LLP	HAGGARTY, HEATHER (Associate)	\$850.00	\$600.00	2 - Investigations and Factual Research	3	\$2,550.00	\$1,800.00
				3 - Case Management and Litigation Strategy	39.6	\$33,660.00	\$23,760.00
				4 - Discovery	0.2	\$170.00	\$120.00
				6 - Pleadings, Briefs and Legal Research	48	\$40,800.00	\$28,800.00
					90.8	\$77,180.00	\$54,480.00
Pritzker Levine LLP	LEVINE, JONATHAN (Partner)	\$1,100.00	\$895.00	2 - Investigations and Factual Research	0.3	\$330.00	\$268.50
				3 - Case Management and Litigation Strategy	131.3	\$144,430.00	\$117,513.50
				4 - Discovery	15.3	\$16,830.00	\$13,693.50
				6 - Pleadings, Briefs and Legal Research	97.5	\$107,250.00	\$87,262.50
				7 - Court Appearances and Preparation	32.8	\$36,080.00	\$29,356.00
					277.2	\$304,920.00	\$248,094.00
Pritzker Levine LLP	PRITZKER, ELIZABETH (Partner)	\$1,100.00	\$895.00	2 - Investigations and Factual Research	1	\$1,100.00	\$895.00
				3 - Case Management and Litigation Strategy	9.1	\$10,010.00	\$8,144.50
				6 - Pleadings, Briefs and Legal Research	7.8	\$8,580.00	\$6,981.00
					17.9	\$19,690.00	\$16,020.50
Pritzker Levine LLP	WHITNEY, ANNE (Associate)	\$700.00	\$415.00	5 - Document Review	360	\$252,000.00	\$149,400.00
					360	\$252,000.00	\$149,400.00
Pritzker Levine LLP	WHITNEY, ANNE (Associate)	\$700.00	\$600.00	3 - Case Management and Litigation Strategy	11.6	\$8,120.00	\$6,960.00
				6 - Pleadings, Briefs and Legal Research	14	\$9,800.00	\$8,400.00
					25.6	\$17,920.00	\$15,360.00
Robbins Geller Rudman and Dowd LLP	ALPERSTEIN, JASON (Partner)	\$840.00	\$840.00	3 - Case Management and Litigation Strategy	0.3	\$252.00	\$252.00
				4 - Discovery	2.8	\$2,352.00	\$2,352.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
				6 - Pleadings, Briefs and Legal Research	274.7	\$230,748.00	\$230,748.00
				7 - Court Appearances and Preparation	1	\$840.00	\$840.00
					278.8	\$234,192.00	\$234,192.00
Robbins Geller Rudman and Dowd LLP	BEALL, BRADLEY (Associate)	\$515.00	\$515.00	4 - Discovery	61.2	\$31,518.00	\$31,518.00
				6 - Pleadings, Briefs and Legal Research	554.3	\$285,464.50	\$285,464.50
				12 - Settlement	0.7	\$360.50	\$360.50
					616.2	\$317,343.00	\$317,343.00
Robbins Geller Rudman and Dowd LLP	BRANDON, KELLEY (Paralegal)	\$325.00	\$275.00	2 - Investigations and Factual Research	11.5	\$3,737.50	\$3,162.50
					11.5	\$3,737.50	\$3,162.50
Robbins Geller Rudman and Dowd LLP	BRITO, NICOLLE (Associate)	\$675.00	\$600.00	6 - Pleadings, Briefs and Legal Research	28.9	\$19,507.50	\$17,340.00
					28.9	\$19,507.50	\$17,340.00
Robbins Geller Rudman and Dowd LLP	COHEN, ALEXANDER (Associate)	\$560.00	\$560.00	3 - Case Management and Litigation Strategy	6.9	\$3,864.00	\$3,864.00
				4 - Discovery	2.9	\$1,624.00	\$1,624.00
				6 - Pleadings, Briefs and Legal Research	75.6	\$42,336.00	\$42,336.00
				7 - Court Appearances and Preparation	1.2	\$672.00	\$672.00
				8 - Experts/Consultants	55	\$30,800.00	\$30,800.00
					141.6	\$79,296.00	\$79,296.00
Robbins Geller Rudman and Dowd LLP	CURTISS, BROOKE (Staff Attorney)	\$440.00	\$415.00	3 - Case Management and Litigation Strategy	6.1	\$2,684.00	\$2,531.50
				6 - Pleadings, Briefs and Legal Research	1.1	\$484.00	\$456.50
					7.2	\$3,168.00	\$2,988.00
Robbins Geller Rudman and Dowd LLP	DAVIDSON, STUART (Partner)	\$1,030.00	\$895.00	6 - Pleadings, Briefs and Legal Research	0.2	\$206.00	\$179.00
					0.2	\$206.00	\$179.00
Robbins Geller Rudman and Dowd LLP	DAVIS, ALINA (Associate)	\$675.00	\$600.00	3 - Case Management and Litigation Strategy	0.6	\$405.00	\$360.00
					0.6	\$405.00	\$360.00
Robbins Geller Rudman and Dowd LLP	DEARMAN, MARK (Partner)	\$1,100.00	\$895.00	2 - Investigations and Factual Research	3.8	\$4,180.00	\$3,401.00
				3 - Case Management and Litigation Strategy	28.2	\$31,020.00	\$25,239.00
				4 - Discovery	16.5	\$18,150.00	\$14,767.50
				6 - Pleadings, Briefs and Legal Research	111.6	\$122,760.00	\$99,882.00
				7 - Court Appearances and Preparation	33.8	\$37,180.00	\$30,251.00
				8 - Experts/Consultants	16.7	\$18,370.00	\$14,946.50
				12 - Settlement	0.8	\$880.00	\$716.00
					211.4	\$232,540.00	\$189,203.00
Robbins Geller Rudman and Dowd LLP	DONOVAN, BYRON (Staff Attorney)	\$440.00	\$415.00	5 - Document Review	9	\$3,960.00	\$3,735.00
					9	\$3,960.00	\$3,735.00
Robbins Geller Rudman and Dowd LLP	GELLER, PAUL (Partner)	\$1,375.00	\$895.00	3 - Case Management and Litigation Strategy	3.5	\$4,812.50	\$3,132.50
				6 - Pleadings, Briefs and Legal Research	9.4	\$12,925.00	\$8,413.00
				7 - Court Appearances and Preparation	0.1	\$137.50	\$89.50
					13	\$17,875.00	\$11,635.00
Robbins Geller Rudman and Dowd LLP	HANSON, KATINA (Paralegal)	\$410.00	\$275.00	3 - Case Management and Litigation Strategy	62.8	\$25,748.00	\$17,270.00
				6 - Pleadings, Briefs and Legal Research	85.1	\$34,891.00	\$23,402.50
				7 - Court Appearances and Preparation	3.8	\$1,558.00	\$1,045.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
					151.7	\$62,197.00	\$41,717.50
Robbins Geller Rudman and Dowd LLP	JENSEN, RACHEL (Partner)	\$985.00	\$895.00	3 - Case Management and Litigation Strategy	8.3	\$8,175.50	\$7,428.50
				4 - Discovery	34.9	\$34,376.50	\$31,235.50
				6 - Pleadings, Briefs and Legal Research	129.6	\$127,656.00	\$115,992.00
				7 - Court Appearances and Preparation	6.7	\$6,599.50	\$5,996.50
				8 - Experts/Consultants	4.1	\$4,038.50	\$3,669.50
					183.6	\$180,846.00	\$164,322.00
Robbins Geller Rudman and Dowd LLP	MARENCO, RICARDO (Associate)	\$540.00	\$540.00	2 - Investigations and Factual Research	5.3	\$2,862.00	\$2,862.00
				3 - Case Management and Litigation Strategy	27.9	\$15,066.00	\$15,066.00
				6 - Pleadings, Briefs and Legal Research	140.5	\$75,870.00	\$75,870.00
				7 - Court Appearances and Preparation	1	\$540.00	\$540.00
					174.7	\$94,338.00	\$94,338.00
Robbins Geller Rudman and Dowd LLP	PUERTO, PATRICIA (Paralegal)	\$410.00	\$275.00	2 - Investigations and Factual Research	1.5	\$615.00	\$412.50
				3 - Case Management and Litigation Strategy	9.1	\$3,731.00	\$2,502.50
				4 - Discovery	1.4	\$574.00	\$385.00
				6 - Pleadings, Briefs and Legal Research	10.5	\$4,305.00	\$2,887.50
					22.5	\$9,225.00	\$6,187.50
Robbins Geller Rudman and Dowd LLP	SAWYER, MAXWELL (Associate)	\$475.00	\$475.00	3 - Case Management and Litigation Strategy	0.2	\$95.00	\$95.00
				4 - Discovery	4.8	\$2,280.00	\$2,280.00
				6 - Pleadings, Briefs and Legal Research	323.9	\$153,852.50	\$153,852.50
				7 - Court Appearances and Preparation	0.6	\$285.00	\$285.00
					329.5	\$156,512.50	\$156,512.50
Robbins Geller Rudman and Dowd LLP	SCIALPI, FACUNDO (Associate)	\$465.00	\$465.00	3 - Case Management and Litigation Strategy	0.5	\$232.50	\$232.50
				4 - Discovery	5.6	\$2,604.00	\$2,604.00
				6 - Pleadings, Briefs and Legal Research	52.6	\$24,459.00	\$24,459.00
				8 - Experts/Consultants	1	\$465.00	\$465.00
					59.7	\$27,760.50	\$27,760.50
Robbins Geller Rudman and Dowd LLP	TACK, DEBORAH (Paralegal)	\$410.00	\$275.00	3 - Case Management and Litigation Strategy	9.4	\$3,854.00	\$2,585.00
				4 - Discovery	1.7	\$697.00	\$467.50
				6 - Pleadings, Briefs and Legal Research	12.5	\$5,125.00	\$3,437.50
					23.6	\$9,676.00	\$6,490.00
Robbins Geller Rudman and Dowd LLP	TAYLOR, LINDSEY (Partner)	\$1,200.00	\$895.00	3 - Case Management and Litigation Strategy	1.3	\$1,560.00	\$1,163.50
				6 - Pleadings, Briefs and Legal Research	22.3	\$26,760.00	\$19,958.50
					23.6	\$28,320.00	\$21,122.00
Robins Kaplan, LLP	ADLER, NICHOLAS J. (Paralegal)	\$435.00	\$275.00	2 - Investigations and Factual Research	1.5	\$652.50	\$412.50
					1.5	\$652.50	\$412.50
Robins Kaplan, LLP	BERNHAGEN, NICOLE R. (Paralegal)	\$410.00	\$275.00	3 - Case Management and Litigation Strategy	9.3	\$3,813.00	\$2,557.50
					9.3	\$3,813.00	\$2,557.50
Robins Kaplan, LLP	HURT, J. AUSTIN (Of Counsel)	\$1,050.00	\$415.00	5 - Document Review	2	\$2,100.00	\$830.00
					2	\$2,100.00	\$830.00
Robins Kaplan, LLP	HURT, J. AUSTIN (Of Counsel)	\$1,050.00	\$895.00	2 - Investigations and Factual Research	48.4	\$50,820.00	\$43,318.00

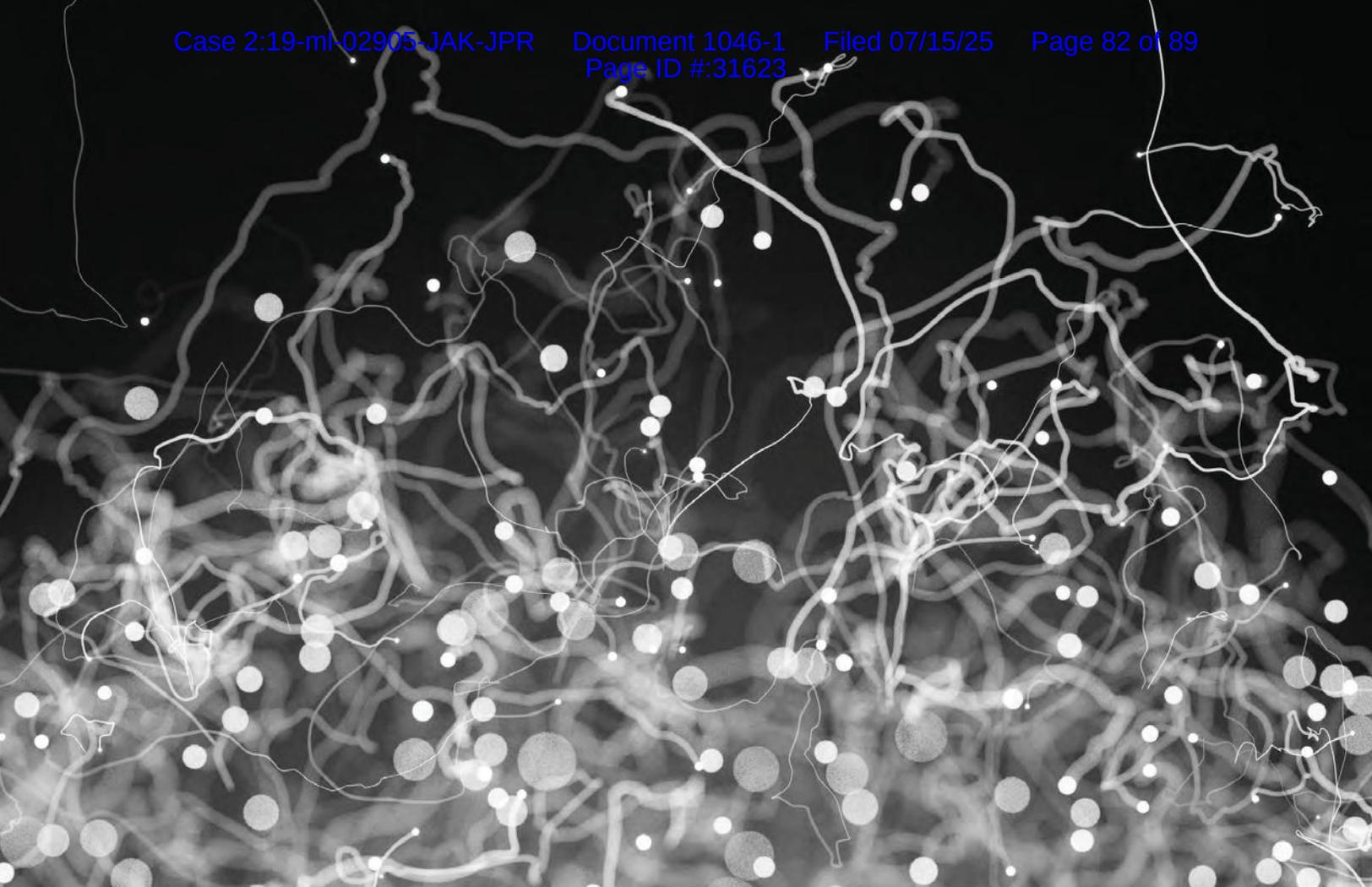
Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper
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Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
				3 - Case Management and Litigation Strategy	226.8	\$238,140.00	\$202,986.00
				4 - Discovery	163.6	\$171,780.00	\$146,422.00
				6 - Pleadings, Briefs and Legal Research	581.6	\$610,680.00	\$520,532.00
				7 - Court Appearances and Preparation	4.9	\$5,145.00	\$4,385.50
					1025.3	\$1,076,565.00	\$917,643.50
Robins Kaplan, LLP	HURT, J. AUSTIN (Partner)	\$1,050.00	\$415.00	5 - Document Review	0.4	\$420.00	\$166.00
					0.4	\$420.00	\$166.00
Robins Kaplan, LLP	HURT, J. AUSTIN (Partner)	\$1,050.00	\$895.00	3 - Case Management and Litigation Strategy	23.5	\$24,675.00	\$21,032.50
				4 - Discovery	164.6	\$172,830.00	\$147,317.00
				7 - Court Appearances and Preparation	0.5	\$525.00	\$447.50
				12 - Settlement	3.3	\$3,465.00	\$2,953.50
					191.9	\$201,495.00	\$171,750.50
Robins Kaplan, LLP	KOZEN, GEOFFREY H. (Associate)	\$990.00	\$600.00	6 - Pleadings, Briefs and Legal Research	171.2	\$169,488.00	\$102,720.00
					171.2	\$169,488.00	\$102,720.00
Robins Kaplan, LLP	LARSON, TAMARA L. (Staff Attorney)	\$365.00	\$365.00	5 - Document Review	0.1	\$36.50	\$36.50
					0.1	\$36.50	\$36.50
Robins Kaplan, LLP	NADEM, KATHLEEN M. (Staff Attorney)	\$255.00	\$255.00	2 - Investigations and Factual Research	3.6	\$918.00	\$918.00
					3.6	\$918.00	\$918.00
Robins Kaplan, LLP	PACELLI, MICHAEL J. (Associate)	\$795.00	\$600.00	2 - Investigations and Factual Research	0.7	\$556.50	\$420.00
				3 - Case Management and Litigation Strategy	73.1	\$58,114.50	\$43,860.00
				4 - Discovery	106.3	\$84,508.50	\$63,780.00
				6 - Pleadings, Briefs and Legal Research	650.2	\$516,909.00	\$390,120.00
				7 - Court Appearances and Preparation	10	\$7,950.00	\$6,000.00
					840.3	\$668,038.50	\$504,180.00
Robins Kaplan, LLP	POTTER, ANN M. (Paralegal)	\$410.00	\$275.00	2 - Investigations and Factual Research	30.5	\$12,505.00	\$8,387.50
				3 - Case Management and Litigation Strategy	13.4	\$5,494.00	\$3,685.00
				4 - Discovery	14.6	\$5,986.00	\$4,015.00
				6 - Pleadings, Briefs and Legal Research	20.6	\$8,446.00	\$5,665.00
					79.1	\$32,431.00	\$21,752.50
Robins Kaplan, LLP	SLAUGHTER, STACEY P. (Partner)	\$1,280.00	\$415.00	5 - Document Review	1.6	\$2,048.00	\$664.00
					1.6	\$2,048.00	\$664.00
Robins Kaplan, LLP	SLAUGHTER, STACEY P. (Partner)	\$1,280.00	\$895.00	2 - Investigations and Factual Research	5.6	\$7,168.00	\$5,012.00
				3 - Case Management and Litigation Strategy	123.4	\$157,952.00	\$110,443.00
				4 - Discovery	48.7	\$62,336.00	\$43,586.50
				6 - Pleadings, Briefs and Legal Research	323.6	\$414,208.00	\$289,622.00
				7 - Court Appearances and Preparation	41.4	\$52,992.00	\$37,053.00
				12 - Settlement	1.3	\$1,664.00	\$1,163.50
					544	\$696,320.00	\$486,880.00
Robins Kaplan, LLP	SOTTORFF, FELIPE (Staff Attorney)	\$255.00	\$255.00	2 - Investigations and Factual Research	3	\$765.00	\$765.00
					3	\$765.00	\$765.00
Robins Kaplan, LLP	WILSON, STACEY (Staff Attorney)	\$400.00	\$400.00	4 - Discovery	1	\$400.00	\$400.00

Exhibit B - Summary of Hours and Lodestar Organized by Timekeeper

Firm	Timekeeper	Standard Hourly Rate	Adjusted Hourly Rate	Task Category	Total Hours Spent by Task	Standard Hourly Lodestar	Reduced Hourly Lodestar
					1	\$400.00	\$400.00
Robins Kaplan, LLP	ZABEL, RICHARD R. (Paralegal)	\$930.00	\$275.00	6 - Pleadings, Briefs and Legal Research	3.7	\$3,441.00	\$1,017.50
					3.7	\$3,441.00	\$1,017.50
Seeger Weiss LLP	ARTEAGA, ALEXANDRA (Paralegal)	\$395.00	\$275.00	3 - Case Management and Litigation Strategy	3.6	\$1,422.00	\$990.00
					3.6	\$1,422.00	\$990.00
Seeger Weiss LLP	AYERS, CHRISTOPHER (Partner)	\$1,075.00	\$895.00	2 - Investigations and Factual Research	5.1	\$5,482.50	\$4,564.50
				3 - Case Management and Litigation Strategy	29.5	\$31,712.50	\$26,402.50
				4 - Discovery	34.7	\$37,302.50	\$31,056.50
				6 - Pleadings, Briefs and Legal Research	26.3	\$28,272.50	\$23,538.50
				8 - Experts/Consultants	4	\$4,300.00	\$3,580.00
					99.6	\$107,070.00	\$89,142.00
Seeger Weiss LLP	AZARIAN, NICOLE (Paralegal)	\$275.00	\$275.00	2 - Investigations and Factual Research	2.5	\$687.50	\$687.50
				4 - Discovery	4.9	\$1,347.50	\$1,347.50
					7.4	\$2,035.00	\$2,035.00
Seeger Weiss LLP	KRAMER, LESLIE (Paralegal)	\$295.00	\$275.00	2 - Investigations and Factual Research	15.1	\$4,454.50	\$4,152.50
				3 - Case Management and Litigation Strategy	19.5	\$5,752.50	\$5,362.50
				4 - Discovery	19.3	\$5,693.50	\$5,307.50
				6 - Pleadings, Briefs and Legal Research	33.7	\$9,941.50	\$9,267.50
					87.6	\$25,842.00	\$24,090.00
Seeger Weiss LLP	ROINICK, SUSAN (Staff Attorney)	\$575.00	\$415.00	4 - Discovery	6.3	\$3,622.50	\$2,614.50
					6.3	\$3,622.50	\$2,614.50
Seeger Weiss LLP	SAFDAR, HUMAIRA (Associate)	\$525.00	\$525.00	2 - Investigations and Factual Research	0.7	\$367.50	\$367.50
				4 - Discovery	4.3	\$2,257.50	\$2,257.50
					5	\$2,625.00	\$2,625.00
Seeger Weiss LLP	SCULLION, JENNIFER (Partner)	\$850.00	\$850.00	3 - Case Management and Litigation Strategy	3.8	\$3,230.00	\$3,230.00
					3.8	\$3,230.00	\$3,230.00
Seeger Weiss LLP	SEEGER, CHRISTOPHER (Partner)	\$985.00	\$895.00	3 - Case Management and Litigation Strategy	1.5	\$1,477.50	\$1,342.50
					1.5	\$1,477.50	\$1,342.50
Seeger Weiss LLP	TAWIL, DAVID (Associate)	\$675.00	\$600.00	4 - Discovery	10.8	\$7,290.00	\$6,480.00
					10.8	\$7,290.00	\$6,480.00
Seeger Weiss LLP	TYJER, SABRINA (Paralegal)	\$395.00	\$275.00	2 - Investigations and Factual Research	3.4	\$1,343.00	\$935.00
				4 - Discovery	5.2	\$2,054.00	\$1,430.00
					8.6	\$3,397.00	\$2,365.00
GRAND TOTALS:					123,711.50	\$78,265,905.00	\$64,739,461.50

EXHIBIT C



ELM Solutions

2023 Real Rate Report[®]

The industry's leading
analysis of law firm rates,
trends, and practices



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A Letter to Our Readers

Welcome to the latest edition of Wolters Kluwer ELM Solutions Real Rate Report®, the industry's leading data-driven benchmark report for lawyer and paralegal rates.

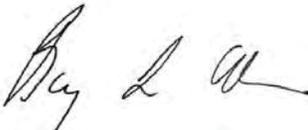
Our Real Rate Report has been a relied upon data analytics resource to the legal industry since its inception in 2010 and continues to evolve, providing you with the most comprehensive rate benchmarking insights, trends, and practices. The Real Rate Report is powered by the Wolters Kluwer ELM Solutions LegalVIEW® data warehouse, which has grown to include \$160B+ in anonymized legal data.

The depth and granularity of the data within the Real Rate Report empowers users to benchmark and negotiate effectively and make well-informed investment and resourcing decisions for the organization.

As with previous Real Rate Reports, our data is sourced from corporations' and law firms' e-billing and time management solutions. We have included lawyer and paralegal rate data filtered by specific practice and sub-practice areas, metropolitan areas, and types of matters. This level of detail gives legal departments and law firms the precision they need to identify areas of opportunity. We strive to make the Real Rate Report a valuable and actionable reference tool for legal departments and law firms.

As always, we welcome your comments and suggestions on what information would make this publication more valuable to you. We thank our data contributors for participating in this program. And we thank you for making Wolters Kluwer ELM Solutions your trusted partner for legal industry domain expertise, data, and analytics and look forward to continuing to provide market-leading, expert solutions that deliver the best business outcomes for collaboration among legal departments and law firms.

Sincerely,



Barry Ader

Vice President, Product Management and Marketing
Wolters Kluwer ELM Solutions

Report Use Considerations

2023 Real Rate Report

- Examines law firm rates over time
- Identifies rates by location, experience, firm size, areas of expertise, industry, and timekeeper role (i.e., partner, associate, and paralegal)
- Itemizes variables that drive rates up or down

All the analyses included in the report derive from the actual rates charged by law firm professionals as recorded on invoices submitted and approved for payment.

Examining real, approved rate information, along with the ranges of those rates and their changes over time, highlights the role these variables play in driving aggregate legal cost and income. The analyses can energize questions for both corporate clients and law firm principals.

Clients might ask whether they are paying the right amount for different types of legal services, while law firm principals might ask whether they are charging the right amount for legal services and whether to modify their pricing approach.

Some key factors¹ that drive rates²:

Attorney location - Lawyers in urban and major metropolitan areas tend to charge more when compared with lawyers in rural areas or small towns.

Litigation complexity - The cost of representation will be higher if the case is particularly complex or time-consuming; for example, if there are a large number of documents to review, many witnesses to depose, and numerous procedural steps, the case is likely to cost more (regardless of other factors like the lawyer's level of experience).

Years of experience and reputation - A more experienced, higher-profile lawyer is often going to charge more, but absorbing this higher cost at the outset may make more sense than hiring a less expensive lawyer who will likely take time and billable hours to come up to speed on unfamiliar legal and procedural issues.

Overhead - The costs associated with the firm's support network (paralegals, clerks, and assistants), document preparation, consultants, research, and other expenses.

Firm size - The rates can increase if the firm is large and has various timekeeper roles at the firm. For example, the cost to work with an associate or partner at a larger firm will be higher compared to a firm that has one to two associates and a paralegal.

¹ David Goguen, J.D., University of San Francisco School of Law (2020) Guide to Legal Services Billing Retrieved from: <https://www.lawyers.com/legal-info/research/guide-to-legal-services-billing-rates.html>

² Source: 2018 RRR. Factor order validated in multiple analyses since 2010

Section I: High-Level Data Cuts

Cities
By Matter Type

2023 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2023	2022	2021
Jackson MS	Non-Litigation	Associate	21	\$55	\$55	\$176	\$125	\$159	\$125
Jacksonville FL	Litigation	Partner	10	\$269	\$333	\$478	\$352	\$394	\$543
Kansas City MO	Litigation	Partner	59	\$415	\$466	\$596	\$511	\$473	\$450
		Associate	48	\$277	\$350	\$385	\$331	\$316	\$316
	Non-Litigation	Partner	103	\$428	\$522	\$625	\$530	\$526	\$487
		Associate	85	\$260	\$338	\$385	\$335	\$324	\$312
Las Vegas NV	Litigation	Partner	11	\$296	\$350	\$453	\$380	\$405	\$450
		Non-Litigation	Partner	16	\$420	\$502	\$601	\$502	\$450
		Associate	16	\$250	\$282	\$348	\$300	\$305	\$297
Little Rock AR	Non-Litigation	Partner	12	\$215	\$250	\$315	\$284	\$260	\$256
Los Angeles CA	Litigation	Partner	302	\$525	\$840	\$1,159	\$867	\$815	\$739
		Associate	353	\$431	\$680	\$880	\$674	\$650	\$606
	Non-Litigation	Partner	438	\$574	\$857	\$1,198	\$905	\$941	\$904
		Associate	492	\$452	\$635	\$840	\$660	\$697	\$715

Section IV: In-Depth Analysis for Select US Cities

Los Angeles CA By Practice Area and Firm Size

2023 - Real Rates for Associate and Partner

Trend Analysis - Mean

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2023	2022	2021
Commercial	50 Lawyers or Fewer	Partner	12	\$407	\$517	\$656	\$533	\$479	\$452
	201-500 Lawyers	Associate	11	\$422	\$472	\$544	\$481	\$493	\$449
	501-1,000 Lawyers	Partner	13	\$744	\$960	\$1,098	\$910	\$885	\$801
		Associate	19	\$656	\$772	\$817	\$755	\$695	\$648
	More Than 1,000 Lawyers	Partner	26	\$974	\$1,275	\$1,393	\$1,220	\$1,117	\$1,073
		Associate	31	\$641	\$830	\$1,050	\$831	\$866	\$811
Corporate: Governance	More Than 1,000 Lawyers	Partner	13	\$1,137	\$1,203	\$1,230	\$1,185	\$1,132	\$1,069
Corporate: Mergers, Acquisitions and Divestitures	More Than 1,000 Lawyers	Associate	29	\$503	\$642	\$643	\$634	\$596	\$588
Corporate: Other	50 Lawyers or Fewer	Partner	19	\$398	\$475	\$680	\$584	\$591	\$424
	201-500 Lawyers	Partner	26	\$651	\$872	\$972	\$807	\$746	\$731
		Associate	15	\$437	\$500	\$710	\$556	\$535	\$489
	501-1,000 Lawyers	Partner	27	\$840	\$978	\$1,202	\$1,047	\$932	\$870
		Associate	29	\$645	\$800	\$903	\$760	\$742	\$676
	More Than 1,000 Lawyers	Partner	56	\$1,095	\$1,304	\$1,500	\$1,287	\$1,201	\$1,120
		Associate	65	\$655	\$830	\$946	\$811	\$792	\$783
	Corporate: Regulatory and Compliance	501-1,000 Lawyers	Partner	13	\$765	\$985	\$1,123	\$937	\$967
Associate			14	\$585	\$703	\$818	\$716	\$595	\$608
More Than 1,000 Lawyers		Partner	19	\$898	\$1,071	\$1,175	\$1,063	\$1,058	\$993

Section IV: In-Depth Analysis for Select US Cities

Los Angeles CA By Practice Area and Firm Size

2023 - Real Rates for Associate and Partner

Trend Analysis - Mean

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2023	2022	2021
Corporate: Regulatory and Compliance	More Than 1,000 Lawyers	Associate	28	\$570	\$749	\$900	\$752	\$760	\$719
Corporate: Tax	More Than 1,000 Lawyers	Associate	17	\$735	\$851	\$934	\$861	\$789	\$675
Employment and Labor: Other	501-1,000 Lawyers	Partner	21	\$476	\$630	\$784	\$759	\$748	\$777
		Associate	16	\$325	\$453	\$800	\$568	\$472	\$479
	More Than 1,000 Lawyers	Partner	23	\$783	\$1,080	\$1,203	\$999	\$972	\$838
		Associate	24	\$399	\$454	\$834	\$590	\$596	\$561
Finance and Securities: Investments and Other Financial Instruments	501-1,000 Lawyers	Associate	15	\$592	\$657	\$687	\$645	\$603	\$583
	More Than 1,000 Lawyers	Partner	33	\$1,160	\$1,265	\$1,413	\$1,303	\$1,328	\$1,277
Finance and Securities: Loans and Financing	201-500 Lawyers	Associate	14	\$481	\$556	\$624	\$576	\$547	\$417
		Partner	12	\$772	\$1,120	\$1,205	\$1,037	\$858	\$899
	501-1,000 Lawyers	Associate	13	\$570	\$655	\$740	\$709	\$775	\$683
Insurance Defense: Other	50 Lawyers or Fewer	Partner	54	\$233	\$265	\$280	\$323	\$292	\$317
		Associate	55	\$212	\$215	\$240	\$213	\$213	\$211
Intellectual Property: Patents	More Than 1,000 Lawyers	Partner	13	\$971	\$1,023	\$1,169	\$1,070	\$1,128	\$1,077
		Associate	25	\$603	\$792	\$888	\$790	\$771	\$722

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

*In re ZF-TRW Airbag Control Units
Products Liability Litigation*

**ALL CASES AGAINST THE
HYUNDAI-KIA DEFENDANTS**

Case No. 2:19-ml-02905-JAK-JPR
MDL 2905 JAK

**DECLARATION OF JENNIFER
M. KEOUGH ON SETTLEMENT
NOTICE PROGRAM PROGRESS**

The Honorable John A. Kronstadt

1 I, Jennifer Keough, hereby declare and state as follows:

2 1. I am the Chief Executive Officer and Co-Founder of JND Legal
3 Administration LLC (“JND”). I oversee all facets of our company’s operations,
4 including monitoring and implementing our notice and claims administration
5 programs. This Declaration is based on my personal knowledge as well as upon
6 information provided to me by experienced JND employees, and if called upon to
7 do so, I could and would testify competently thereto.

8 2. This Declaration describes the implementation of the Notice Program,¹
9 as outlined in my March 17, 2025, Declaration on Settlement Notice Program (ECF
10 1027-2, the “Initial Declaration”), and provides an update on the notice
11 administration process. The Notice Program is ongoing and was designed to reach
12 virtually all potential Class Members to inform them of the proposed Settlement
13 and their rights and options.

14 **CAFA NOTICE**

15 3. On March 27, 2025, JND mailed notice of the Hyundai-Kia Airbag
16 Control Unit Settlement to the United States Attorney General and to the
17 appropriate State officials pursuant to the Class Action Fairness Act of 2005.

18 **DIRECT NOTICE**

19 **A. Class Member Identification**

20 4. To prepare direct notice to Class Members, JND obtained the Vehicle
21 Identification Numbers (VINs) for each of the Hyundai and Kia Subject Vehicles.
22 Defendants provided JND with data that identified 3,729,557 unique Hyundai and
23 Kia Subject Vehicle VINs. This includes 2,205,757 Hyundai Subject Vehicle VINs,
24 of which 583,384 are Recalled Vehicles and 1,523,800 Kia Subject Vehicles VINs,
25 of which 507,587 are Recalled Vehicles.

26
27
28 ¹ All capitalized terms not defined herein have the meanings given to them in my Initial Declaration.

1 5. Using the Hyundai and Kia Subject Vehicle VIN data, JND staff
2 worked with a third-party data aggregation service to acquire vehicle registration
3 information from the state Departments of Motor Vehicles (“DMVs”) for all fifty
4 states and U.S. Territories. This data included the contact information for all current
5 and former owners and lessees of the Hyundai and Kia Subject Vehicles.

6 6. JND combined, analyzed, de-duplicated and standardized the data that
7 it received from the DMVs to provide individual notice to virtually all potential
8 Class Members.

9 7. JND promptly loaded the VINs and potential Class Member contact
10 information into a case-specific database for the Settlement. A unique identification
11 number was assigned to each potential Class Member to identify them throughout
12 the administration process.

13 8. JND conducted a sophisticated email append process to obtain email
14 addresses for as many potential Class Members as possible. The email append
15 process utilized skip tracing tools to identify any email address by which the
16 potential Class Member may be reached. JND then reviewed the data to identify
17 any undeliverable email addresses.

18 **B. Direct Email Notice**

19 9. The direct email notice campaign commenced on June 6, 2025. JND
20 emailed notice to all potential Class Members for whom JND obtained a valid
21 email address through the email append process. The Email Notice included the
22 same language as the court-approved Email Notice (ECF 1027-2, Exhibit B). JND
23 customized the Email Notice to include the potential Class Member’s name and
24 VIN. The Email Notice contained links to the Settlement Website and directed the
25 potential Class Member to visit the website to get more information and submit
26 their Settlement claim.

27 10. JND sent a total of 6,070,187 Email Notices, of which 642,216
28 bounced back and were not deliverable. Based on JND’s experience in other cases,

1 this non-deliverable rate of 10.58% is typical. As described below, JND will
2 supplement the direct email notice campaign by sending Postcard Notices to the
3 Class Members for whom we did not obtain a valid email address or whose Email
4 Notices bounced back as undeliverable.

5 11. The Email Notice as sent is attached as **Exhibit A**.

6 **C. Direct Mail Notice**

7 12. The direct mail notice campaign will commence on July 16, 2025 and
8 be complete by July 21, 2025. A Postcard Notice is being sent to all potential Class
9 Members for whom an Email Notice bounced back as undeliverable, or for whom a
10 valid email address was not obtained. The Postcard Notice includes the same
11 language as the court-approved Postcard Notice (ECF, 1027-2, Exhibit C). JND
12 will customize the Postcard Notice to include the potential Class Member's name,
13 address, and VIN. The Postcard Notice will provide the Settlement Website URL
14 and a QR code that directly links to the Settlement Website. Potential Class
15 Members will be directed to visit the Settlement Website to get more information
16 and submit their Settlement claim.

17 13. JND will send a total of 3,086,639 Postcard Notices. JND will research
18 and promptly re-mail the Notice to any verified updated address that is obtained.

19 14. The Postcard Notice is attached as **Exhibit B**.

20 15. For any potential Class Members who have more than 10 VINs
21 associated with their name and address, JND will send a cover letter that includes
22 language from the Postcard Notice to advise them of the process to submit a bulk
23 claim for more than 10 Hyundai and Kia Subject Vehicles.

24 16. The cover letter is attached as **Exhibit C**.

SUPPLEMENTAL DIGITAL NOTICE

A. Digital Campaign

17. As detailed in the Initial Declaration, JND is supplementing the direct notice effort with a four-week digital campaign that is running through the Google Display Network (“GDN”), Facebook, and Instagram.

18. Prior to launching the digital effort, JND provided GDN, Facebook, and Instagram with secured data to identify potential Class Members based on phone numbers, postal addresses, and/or emails. GDN then matched this Class data with its own first-party data which it collect through Gmail, YouTube, Chrome registrations, etc. Likewise, Facebook and Instagram matched the provided data with its account user data. All matches were utilized to create a “Custom Audience” list. Ads are then served to the Custom Audience while they are active on GDN, Facebook, and Instagram over the course of the campaign. The Class Member data is not being used by GDN, Facebook, or Instagram for any purpose other than the customer match campaign.

19. In addition to the Custom Audience effort, GDN activity is also targeting adults in the U.S. and its territories or possessions who have an interest in Hyundai and Kia vehicles, Hyundai Motor America, Kia America, Inc., and the Hyundai Sonata, the Hyundai Kona, the Hyundai Veloster, the Kia Forte, the Kia Optima, and the Kia Sedona; as well as users who have recently searched Google for relevant keywords such as Kia Sedona recall, Hyundai Sonata recall, Hyundai Sonata hybrid, Hyundai Sonata, Kia Sedona, Kia Optima hybrid, Kia Optima recall, Hyundai recall, Kia recall, Kia Forte, Kia Forte Coup, Hyundai airbag, and Kia airbag.

20. Likewise, Facebook and Instagram activity is also targeting adults in the U.S. and its territories or possessions who have an interest in Hyundai and Kia vehicles, Hyundai Motor America, Kia America, Inc., the Hyundai Sonata, the Hyundai Veloster, the Kia Forte, and the Kia Optima.

1 21. The digital ads include an embedded link to the Settlement Website,
2 where potential Class Members can get more information about the Settlement and
3 file a claim online. A total of 18,751,458 digital impressions were served from June
4 25, 2025 through July 14, 2025.² The digital effort is scheduled to end July 22,
5 2025 with a total of 21 million impressions being served.

6 22. Screenshots of the digital notices as they appeared on GDN, Facebook,
7 and Instagram are attached as **Exhibit D**.

8 **B. Internet Search Campaign**

9 23. From June 25, 2025 through July 14, 2025, JND caused 11,408
10 additional impressions to be served through an internet search campaign. The
11 search effort is scheduled to end July 22, 2025.

12 24. When purchased keywords/phrases related to the Settlement (e.g.,
13 content on the Settlement Website landing page) are searched, a paid Responsive
14 Search Ad (“RSA”) with a hyperlink to the Settlement Website may sometimes
15 appear on the search engine results page. When the RSA is clicked, the visitor is
16 redirected to the Settlement Website where they can get more information about the
17 Settlement. The search effort is being monitored and optimized for
18 keywords/phrases that result in the best click-throughs/conversions.

19 25. Screenshots of the RSAs as they appeared online are attached as
20 **Exhibit E**.

21 **C. Press Release**

22 26. JND caused a press release to be distributed on June 25, 2025 to over
23 5,000 media outlets throughout the U.S., Guam, Full Latin America (to reach
24 Puerto Rico), US Virgin Islands, and Pacific Islands (to reach other
25
26

27 ² Impressions or Exposures are the total number of opportunities to be exposed to a media vehicle or
28 combination of media vehicles containing a notice. Impressions are a gross or cumulative number that
may include the same person more than once. As a result, impressions can and often do exceed the
population size.

1 territories/possessions). As of July 10, 2025, the press release was picked up 521
2 times with a potential audience of 64.2 million.

3 27. A copy of the press release as distributed is attached as **Exhibit F**.

4 **SETTLEMENT WEBSITE AND OTHER CLASS MEMBER NOTICE**

5 **A. Settlement Website**

6 28. On April 21, 2025, JND launched an interactive, case-specific
7 Settlement Website at www.ACUSettlement.com/hyundaikia. This site is located at
8 a subdomain of the ACU Settlements Website, which also provides information
9 about other related settlements. The Settlement Website was listed in the email and
10 digital notices, and is listed in and accessible through QR code in the Postcard
11 Notice. The Settlement Website provides comprehensive information about the
12 Settlement, including answers to frequently asked questions (“FAQs”), contact
13 information for the Settlement Notice Administrator, key dates, including the
14 deadlines to file a claim, request exclusion, and object, and links to important case
15 documents, including the Long Form Notice, the Claim Form, and the Settlement
16 Agreement.

17 29. In addition, the Settlement Website provides a VIN Lookup feature,
18 where potential Class Members can input their VIN to determine whether their
19 vehicle may be eligible for compensation under the Settlement Agreement.

20 30. The Settlement Website also features an online Claim Form with
21 document upload capabilities for the submission of claims. Additionally, as noted
22 above, a Claim Form is posted on the Settlement Website for download for those
23 Class Members who prefer to submit a Claim Form by mail.

24 31. As of July 14, 2025, the Settlement Website has tracked a total of
25 62,720 unique users who registered 74,549 sessions. JND will continue to update
26 and maintain the Settlement Website throughout the Settlement administration
27 process.

28

OBJECTIONS

1
2 38. The Email Notice, Postcard Notice and Long Form Notice
3 (collectively, the “Notices”) inform recipients that any Class Member who wants to
4 object to the proposed Settlement could do so by submitting a written statement on
5 or before August 25, 2025. As of July 14, 2025, JND has received or is otherwise
6 aware of zero objections.

7 **REQUESTS FOR EXCLUSION**

8 39. The Notices also inform Class Members of their right to opt out of the
9 Settlement and the August 25, 2025 postmark deadline to do so. As of July 14,
10 2025, JND has received or is otherwise aware of one request for exclusion. No later
11 than 10 days before the date of the Fairness Hearing, JND will prepare and provide
12 to Counsel a list of individuals and entities who have excluded themselves from the
13 Settlement.

14 **NOTICE DESIGN AND CONTENT**

15 40. The Notices were designed to comply with Rule 23’s guidelines for
16 class action notices and the FJC’s *Judges’ Class Action Notice and Claims Process*
17 *Checklist and Plain Language Guide*. The Notices contained easy-to-read
18 summaries of the instructions on how to obtain more information about the case
19 and direct potential Class Members to the Settlement Website, where the Long
20 Form Notice and other case documents are posted. Courts routinely approve notices
21 that have been written and designed in a similar manner.

22 **TOTAL COST OF ADMINISTRATION**

23 41. The total cost of the notice and claims administration program will
24 ultimately depend on the final claims rate, but JND projects that the total costs will
25 range from approximately \$5.3 million to \$7.2 million based on typical settlement
26 participation rates of 5%-10%.

CONCLUSION

1
2 42. In my opinion, the Notice Program is proving successful and providing
3 the best notice practicable under the circumstances of this case. I will provide a
4 supplemental declaration to the Court prior to the Final Approval Hearing to
5 provide updated information regarding the implementation of the Notice Program.

6 I declare under penalty of perjury that the foregoing is true and correct.

7 Executed July 15, 2025, at Seattle, Washington.

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9 By: 
10 Jennifer M. Keough

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EXHIBIT A

From: HKinfo@ACUSettlement.com
To: [Class Member email address]
Subject: Hyundai-Kia Airbag Control Unit Settlement Notice

COURT-APPROVED LEGAL NOTICE

This is an official, Court-approved Notice about a class action settlement.
Please review the important information below.

Questions?

Visit www.ACUSettlement.com
or Call 1-866-287-0740

Hyundai-Kia Airbag Control Unit Settlement

c/o JND Legal Administration
PO Box 91478
Seattle, WA 98111

HYUNDAI-KIA AIRBAG CONTROL UNIT CLASS ACTION SETTLEMENT NOTICE

Cash Payments of up to \$350 and Other Benefits are Available for Eligible Current and Former Owners and Lessees of Certain Hyundai and Kia Vehicles.

PLEASE REFER TO YOUR UNIQUE ID AND PIN TO FILE A CLAIM

YOUR VIN:	YOUR UNIQUE ID:	YOUR PIN:
XXXXXXXXXXXXXXXXXX	<<Unique_ID>>	XXXXXXXX

Dear [Class Member Name],

You are receiving this Notice because you may be a Class Member in a proposed class action settlement in a lawsuit called *In Re: ZF-TRW Airbag Control Units Products Liability Litigation*, Case No. 2:19-ml-02905-JAK-JPR (C.D. Cal.). A list of the Hyundai and Kia Class Vehicles and other important information and case documents are available on the Settlement Website, www.ACUSettlement.com.

Class Members include all persons or entities who or which, on or before **April 14, 2025**, own, lease, or previously owned or leased Hyundai and Kia Class Vehicles distributed for sale or lease in the United States or any of its territories or possessions. Eligibility for cash payments will be determined by VIN. The Hyundai and Kia Class Vehicles are the:

- 2011-2019 Hyundai Sonata;
- 2011-2019 Hyundai Sonata Hybrid;
- 2018-2023 Hyundai Kona;
- 2022-2023 Hyundai Kona N;
- 2019-2021 Hyundai Veloster;
- 2010-2013 Kia Forte;

- 2010-2013 Kia Forte Koup;
- 2011-2020 Kia Optima;
- 2011-2016 Kia Optima Hybrid; and
- 2011-2012, 2014 Kia Sedona;

The Settlement provides **\$62.1 million** to resolve claims that the Hyundai and Kia Class Vehicles contain defective ZF-TRW airbag control units that are vulnerable to a condition called electrical overstress, which may cause the vehicles' airbags and other safety features to fail during a collision. The Settling defendants deny the claims but have agreed to settle. The Court has not decided who is right.

You have been identified as a potential Class Member based on records from Hyundai and Kia and the DMV. The purpose of this Notice is to inform you of the proposed class action settlement so you may decide what to do. **Your legal rights under the Settlement are affected even if you do nothing, so please read this Notice carefully.**

The cash compensation available will be reimbursement for certain out-of-pocket expenses related to the Recalls and residual payments of up to \$350 for Recalled Vehicles and \$150 for Unrecalled Vehicles.

In addition to the cash payments, the Settlement provides for a New Parts Warranty for the new parts installed pursuant to the Recalls and a robust Hyundai and Kia Class Vehicle inspection program. Please visit www.ACUSettlement.com for more information.

HOW DO I GET A PAYMENT?

You must submit a claim to receive a cash payment. The claims process is easy to complete and will require basic documentation to show your out-of-pocket expenses, such as a receipt or invoice, or a signed affidavit if you don't have a receipt or invoice.

To submit your claim online, please click the "File A Claim" link or scan the QR code below. You can also visit www.ACUSettlement.com and enter your Unique ID and PIN. If you would like to submit your claim by mail, you can download and print the claim form on the Settlement Website or call to request a form. The fastest option is to submit your claim online.

You should submit your claim now. Claim forms must be electronically submitted or postmarked no later than **March 29, 2027**. This schedule may change, so please visit the Settlement Website regularly for updates.

FILE A CLAIM

HOW DO I SUBMIT MY CLAIM ONLINE?

Visit the Settlement Website at www.ACUSettlement.com or scan the QR code above.



Insert your Unique ID and PIN, fill out the claim form and submit.



Under the current schedule, the deadline to file your claim is **March 29, 2027**.

You should submit your claim now.

WHAT ARE MY OTHER OPTIONS?

You may exclude yourself from or object to the Settlement by **August 25, 2025**.

If you exclude yourself, you will not receive any cash payments, but you will reserve your rights to sue Defendants over the claims that this Settlement resolves. If you do not exclude yourself from the Settlement, you will be bound by the Court's orders and judgments like all other Class Members, even if you do not file a claim.

If you wish to object, the Court will consider your views in deciding whether to approve or reject this Settlement. If the Court does not approve the Settlement, no cash payments will be sent, and the lawsuit will continue. You cannot object if you exclude yourself from the Settlement.

For information on how to exclude yourself or object, visit www.ACUSettlement.com.

WHAT HAPPENS NEXT?

The Court will hold a hearing on **September 29, 2025 at 8:30 a.m. PST**, to consider whether to grant final approval of the Settlement, award fees and costs to the attorneys representing the Class, and service awards to the Settlement Class Representatives. Co-Lead Counsel will ask the Court to award up to 33% of the Settlement Amount (*i.e.* up to \$20,493,033.30) to cover reasonable attorneys' fees plus costs they incurred in litigating this case and securing this nationwide Settlement for the Class. Co-Lead Counsel will also ask the Court to award each of the proposed Settlement Class Representatives a Service Award of up to \$2,500 each for their work in this litigation. You do not need to attend this hearing, but you are welcome to attend at your own expense. The hearing date may change, so please check the Settlement Website regularly for updates.

Questions? Visit www.ACUSettlement.com or Call 1-866-287-0740

To unsubscribe from this list, please click on the following link: [Unsubscribe](#)

EXHIBIT B

*A federal court authorized this Notice.
This is not a solicitation from a lawyer.*

**Cash Payments of up
to \$350 and Other
Benefits are Available
for Eligible Current and
Former Owners and
Lessees of Certain
Hyundai and Kia
Vehicles.**

You are receiving this Notice because records indicate you may qualify for this class action settlement.

Questions?
Visit www.ACUSettlement.com
or
Call 1-866-287-0740

Hyundai-Kia Airbag Control Unit Settlement
c/o JND Legal Administration
PO Box 91478
Seattle WA 98111

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Postal Service: Please do not mark barcode

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«CF_ADDRESS_1»
«CF_ADDRESS_2»
«CF_CITY», «CF_STATE» «CF_ZIP»
«CF_COUNTRY»

What is this Class Action Settlement about?

You are receiving this Notice because you may be a Class Member in a proposed class action settlement in a lawsuit called *In Re: ZF-TRW Airbag Control Units Products Liability Litigation*, Case No. 2:19-ml-02905-JAK-JPR (C.D. Cal.). Class Members include current or former owners/lessees of Hyundai and Kia Class Vehicles. A list of the Hyundai and Kia Class Vehicles and other important information and case documents is available on the Settlement Website, www.ACUSettlement.com.

The Settlement provides **\$62.1 million** to resolve claims that the Hyundai and Kia Class Vehicles contain defective ZF-TRW airbag control units that are vulnerable to a condition called electrical overstress, which may cause the vehicles' airbags and other safety features to fail during a collision. The Settling Defendants deny the claims but have agreed to settle. The Court has not decided who is right.

You have been identified as a potential Class Member based on records from Hyundai and Kia and the DMV. The purpose of this Notice is to inform you of the proposed class action settlement so you may decide what to do. **Your legal rights under the Settlement are affected even if you do nothing, so please read this Notice carefully.**

The cash compensation available will be reimbursement for certain out-of-pocket expenses related to the Recalls and residual payments of up to \$350 for Recalled Vehicles and \$150 for Unrecalled Vehicles.

In addition to the cash payments, the Settlement provides for a New Parts Warranty for the new parts installed pursuant to the Recalls and a robust Hyundai and Kia Class Vehicle inspection program. Please visit www.ACUSettlement.com for more information.

How do I get a payment?

You must submit a claim to receive a cash payment. The claims process is easy to complete and will require basic documentation to show your out-of-pocket expenses. To submit your claim online please visit www.ACUSettlement.com. You can also download a claim form on the Settlement Website or call to request a form and submit your claim by mail. The fastest option is to submit your claim online.

You should submit your claim now. Claim forms must be electronically submitted or postmarked no later than **March 29, 2027**. This schedule may change, so please visit the Settlement Website regularly for updates.

What are my other options?

You may exclude yourself from or object to the Settlement by **August 25, 2025**. If you exclude yourself, you will not receive any cash payments, but you will keep your right to sue Defendants over the claims that this Settlement resolves. If you do not exclude yourself from the Settlement, you will be bound by the Court's orders and judgments like all other Class Members, even if you do not file a claim. If you wish to object, the Court will consider your views in deciding whether to approve or reject this Settlement. If the Court does not approve the Settlement, no cash payments will be sent, and the lawsuit will continue. You cannot object if you exclude yourself from the Settlement. For information on how to exclude yourself or object, visit www.ACUSettlement.com.

What happens next?

The Court will hold a hearing on **September 29, 2025 at 8:30 a.m. PST**, to consider whether to grant final approval of the Settlement, award fees and costs to the attorneys representing the Class, and service awards to the Settlement Class Representatives. Co-Lead Counsel will ask the Court to award up to 33% of the Settlement Amount (i.e. up to \$20,493,033.30 million) to cover reasonable attorneys' fees plus costs they incurred in litigating this case and securing this nationwide Settlement for the Class. Co-Lead Counsel will also ask the Court to award each of the proposed Settlement Class Representatives a service award of up to \$2,500 each for their work in this litigation. You do not need to attend this hearing, but you are welcome to attend at your own expense. The hearing date may change, so please check the Settlement Website regularly for updates.

Questions? Visit www.ACUSettlement.com, call toll-free 1-866-287-0740, email HKinfo@ACUSettlement.com, or write Hyundai-Kia Airbag Control Unit Settlement, c/o JND Legal Administration, PO Box 91478, Seattle WA 98111.

YOUR VIN:	XXXXXXXXXXXXXXXXXXXX
YOUR UNIQUE ID:	<<Unique_ID>>
YOUR PIN:	XXXXXXXX
PLEASE REFER TO YOUR UNIQUE ID AND PIN TO FILE A CLAIM	



Carefully separate this Address Change Form at the perforation

Name: _____

Current Address: _____

Address Change Form

To make sure your information remains up-to-date in our records, please confirm your address by filling in the above information and depositing this postcard in the U.S. Mail.



Hyundai-Kia Airbag Control Unit Settlement
c/o JND Legal Administration
PO Box 91478
Seattle, WA 98111

EXHIBIT C

Hyundai-Kia Airbag Control Unit Settlement
c/o JND Legal Administration
PO Box 91478
Seattle, WA 98111

«Printer_ID»



«Fullname»
«AddressLine1»
«AddressLine2»
«AddressCity», «AddressState» «AddressPostalCode»

[DATE]

Hyundai-Kia Airbag Control Unit Settlement – Claim Filing Assistance for Owners or Lessees of more than 10 Hyundai and Kia Class Vehicles

Dear «Fullname»,

You are receiving this letter because you may be eligible for compensation in a proposed class action settlement in a lawsuit called In Re: ZF-TRW Airbag Control Units Products Liability Litigation, Case No. 2:19-ml-02905-JAK-JPR (C.D. Cal.). The Settlement provides compensation to owners and lessees of certain Hyundai and Kia Vehicles (called the “Hyundai and Kia Class Vehicles”), and the estimated payments are up to **\$350** for Recalled Vehicles and **\$150** for Unrecalled Vehicles.

The Court granted preliminary approval of the Settlement on April 14, 2025, and ordered notices to be sent to potential Class Members, like you, to inform them of their legal rights under the Settlement. For more information about the Settlement, including your rights and options and the deadlines to exercise them, please review the enclosed, Court-ordered notice. You may also find up-to-date information related to the Settlement at www.ACUSettlement.com.

DMV records indicate that you may have owned or leased more than 10 Hyundai and Kia Class Vehicles. As further described in the enclosed notice, you will need to submit a claim for these vehicles to seek compensation under the Settlement. A special process has been established to facilitate the bulk filing of claims for Class Members with more than 10 Hyundai and Kia Class Vehicles. To submit a bulk claim, please contact us by email at HKInfo@ACUSettlement.com, or call 1-866-287-0740, and a representative specializing in bulk claims will assist you.

Claims must be submitted by **March 29, 2027**. This schedule may change, so please visit the Settlement Website regularly for updates.

Please read the enclosed legal notice to learn about your rights and options under the Settlement, including important deadlines. For additional information about the proposed Settlement, please visit the Settlement Website at www.ACUSettlement.com.

Regards,

Hyundai-Kia Airbag Control Unit Settlement Notice Administrator

EXHIBIT D



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s 'Wild' Romance with
berg — Including Her
Knew (Exclusive)



Mom of 3 Thought It Was Pregnancy Pain. Then She
Learned She'd Been Living with Terminal Cancer for
5 Years (Exclusive)



Diddy Made Judge Laugh When Answering How
He Was Feeling



Mom Con
Chemother
Later

LEGAL NOTICE

Cash Payments and Other Benefits Are Available
for Eligible Current and Former Owners and
Lessees of Certain Hyundai and Kia Vehicles

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Advertisement

Mariska Hargitay Recalls Feeling Like Her 'Life Was Over' After First Learning About Her Biological Father

Hargitay joined Alex Cooper on the latest episode of 'Call Her Daddy', where she discussed what it was like to discover the truth about her parentage

By [Alex Ross](#) | Published on June 25, 2025 03:14PM EDT

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LEGAL NOTICE

Cash Payments and Other Benefits Are Available for Eligible Current and Former Owners and Lessees of Certain Hyundai and Kia Vehicles

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Two-round NBA mock draft: What we're hearing hours from the draft

Round 1 of the NBA draft is tonight (8 ET on ABC and ESPN), and we have the intel on trade talks and picks.

2h • Jonathan Givony and Jeremy Woo



The 'abrupt reversal of fortune' that changed everything for Cooper Flagg and the Mavs

The presumptive No. 1 pick and the Mavs, still reeling from trading Luka Doncic, might be made for each other.

1d • Buster Holmes

[What we know about 76ers going into draft](#)
[Full draft order](#)

[2025 NBA draft: Players, intel, rankings and more](#)



'Championships, fan experience, community:'

CB Griffin reuniting with Seahawks, source says

Arenas: 'Fighting time' to escape burning truck

Sportsbooks have Flagg in rare air for NBA draft

Inside a wild weekend with Canelo and Crawford

LEGAL NOTICE



Cash Payments and Other Benefits Are Available for Eligible Current and Former Owners and Lessees of Certain Hyundai and Kia Vehicles

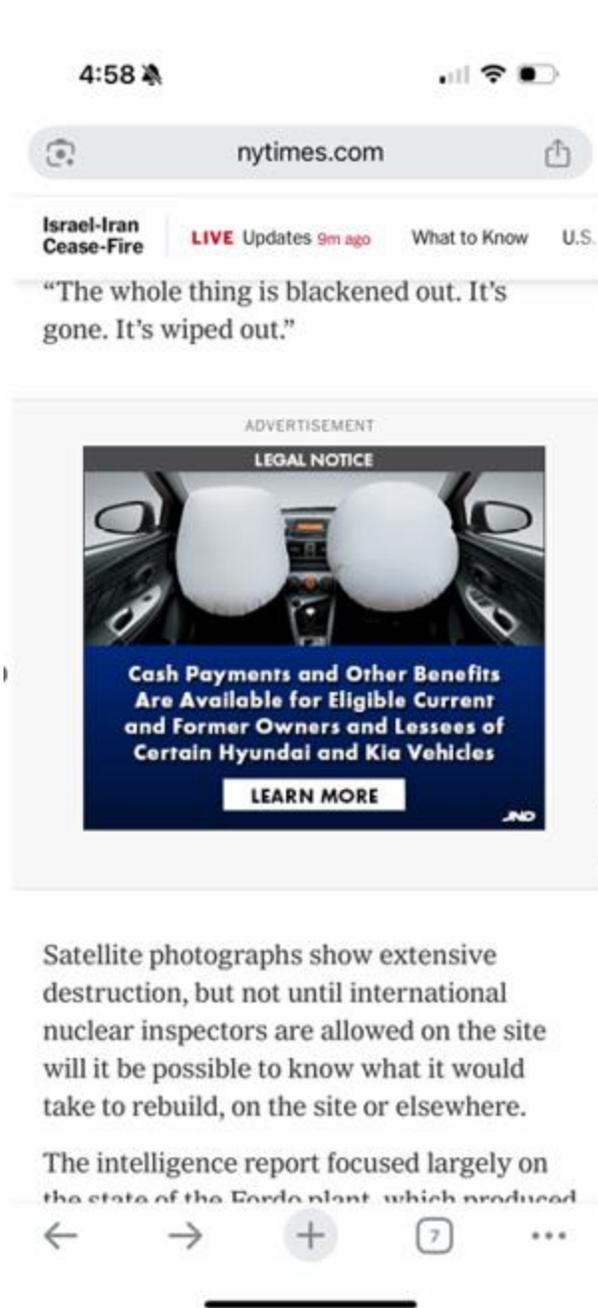
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ICYMI



Spencer Strider has words for Juan Soto after strikeout

After striking out Juan Soto, Spencer Strider is caught on camera exchanging pleasantries with him.



4:54   

bleacherreport.com

 **B·R**

 **Cavs Getting Calls on Garland**

TOP 75 BIG BOARD



 **Ranking Best Prospects** 



 **Top NFL Draft Picks of Last 25 Years** 

NBA Draft 

LEGAL NOTICE Cash Payments and Other Benefits Are Available for Eligible Current and Former Owners and Lessees of Certain Hyundai and Kia Vehicles **LEARN MORE** JMO

The screenshot shows a Facebook desktop interface. At the top, the browser title is "JND-ABG25 FB Desktop Feed screenshot_6.25.25.png". The Facebook navigation bar includes a search bar, home, notifications, and messages icons. On the left, the user profile "Rachel Greenberg" is visible, along with navigation options: Meta AI, Friends, Groups, Saved, Memories, Reels, Marketplace, and See more. The main feed area features a sponsored post from "Class Action Notice" with a green checkmark icon. The post image shows the interior of a car with two deployed airbags. Below the image, the text reads: "Cash Payments and Other Benefits Are Available for Eligible Current and Former Owners and Lessees of Certain Hyundai and Kia Vehicles". The URL "WWW.ACUSETTLEMENT.COM" and the title "Airbag Settlement" are displayed. Below the post are "Like", "Comment", and "Share" buttons. To the right of the main feed, there are sections for "Sponsored" posts (including "Cater to every craving" and "Ari Bikes x Slack"), "Birthdays" (listing "Patti Sandberg Wallshein's birthday is today"), and "Contacts". The bottom of the browser window shows system tray icons, a 93% zoom level, and a file size of 432.9 KB.

lilypulitzer.com
Introducing Penny's Playground purpose.

28 6 comments 1 share

Like Comment Send Share

 **Class Action Notice** ... X
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Cash Payments and Other Benefits Are Available for Eligible Current and Former Owners and Lessees of Certain Hyundai and Kia Vehicles

www.acusettlement.com [Learn more](#)

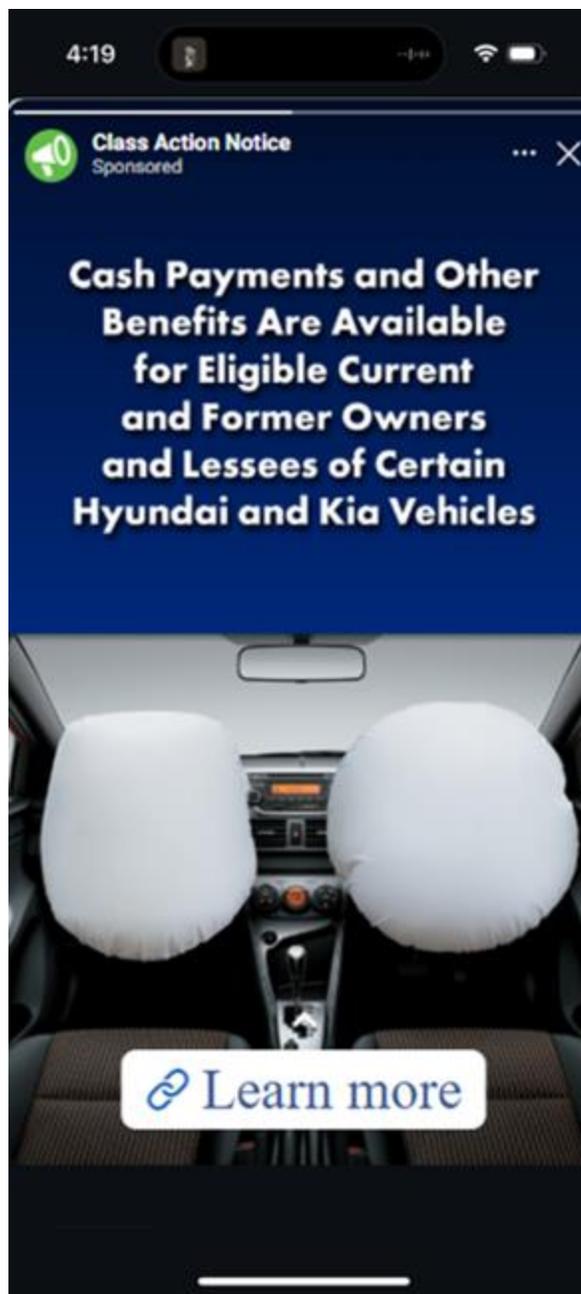
Airbag Settlement

Like Comment Share

 **Reels** ...



When you're home with the family, do you walk around the house without your shoes?



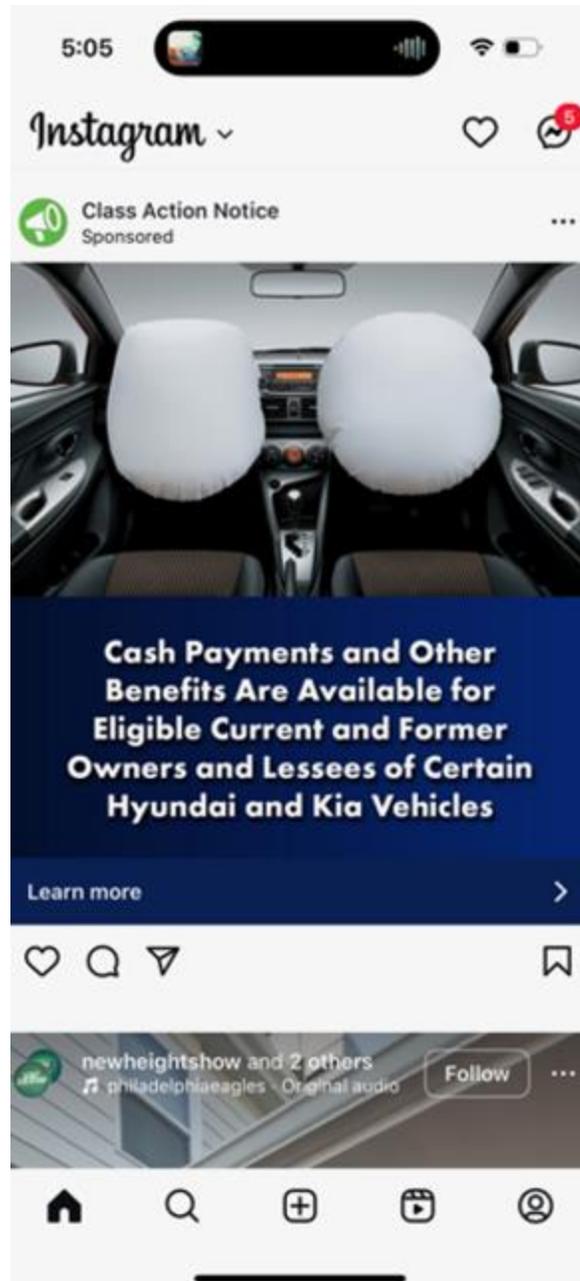
4:19

Class Action Notice
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Cash Payments and Other Benefits Are Available for Eligible Current and Former Owners and Lessees of Certain Hyundai and Kia Vehicles

[Learn more](#)

The image shows a mobile notification on a smartphone. At the top, the status bar displays the time 4:19, signal strength, Wi-Fi, and battery icons. The notification itself has a dark blue header with a green speaker icon and the text 'Class Action Notice' and 'Sponsored'. The main body of the notification features white text on a dark blue background, followed by a photograph of a car's interior with two deployed airbags. At the bottom, there is a white button with a blue link icon and the text 'Learn more'.



5:06 [Signal] [Wi-Fi] [Battery]

Class Action Notice

Cash Payments and Other Benefits Are Available for Eligible Current and Former Owners and Lessees of Certain Hyundai and Kia Vehicles

Learn more

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EXHIBIT E



hyundai-kia settlement



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 www.acusettlement.com/

Hyundai-Kia Vehicles Affected - Airbag Control Unit Settlement

Cash payments up to \$350 and other benefits are available. File a Claim. Current and former owners and lessees of certain Hyundai and Kia vehicles are eligible.

[Key Dates](#) · [Important Documents](#)

 Hyundai USA
<https://autoservice.hyundaiusa.com/SetRedirectView>

Hyundai Class Action Settlement

Beginning February 12, 2024, eligible class members (current & previous owners of the subject vehicles) will receive notice of the Settlement by mail and email, ...

People also ask :

- How much will I get from the Hyundai settlement? 

- Will Kia and Hyundai make a one-off payment of over \$3000? 

- How do I claim my Kia Hyundai settlement? 

- Am I eligible for the Kia settlement? 

[Feedback](#)

 Hagens Berman, Law Firm
<https://www.hbsslaw.com/faq>

Hyundai / Kia Car Theft Defect Lawsuit & Settlement FAQ

Under the settlement, class vehicles ineligible for the software upgrade may file claims for reimbursement up to \$300 for the purchase of a steering wheel lock ...

9:12



 hyundai-kia settlement  

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 [acusettlement.com](https://www.acusettlement.com) 
<https://www.acusettlement.com>

Hyundai-Kia Vehicles Affected | Airbag Control Unit Settlement

Current and former owners and lessees of certain Hyundai and Kia vehicles are eligible. Cash payments up to \$350 and other benefits are available. File a Claim.

Key Dates 

File a Claim 

Important Documents 

FAQ 

 [Hyundai Theft Settlement](https://www.hyundai theftsettlement.com) 
<https://www.hyundai theftsettlement.com>

Hyundai Theft Settlement

The deadline to file a claim is April 28, 2025. We are currently notifying claimants of their initial claim



EXHIBIT F

Cash payments of up to \$350 and other benefits are available for eligible current and former owners and lessees of Certain Hyundai and Kia vehicles

USA - English ▼

NEWS PROVIDED BY
JND Legal Administration →
Jun 25, 2025, 09:25 ET

SEATTLE, June 25, 2025 /PRNewswire/ -- **JND Legal Administration**

A proposed class action settlement has been reached in a lawsuit called *In Re: ZF-TRW Airbag Control Units Products Liability Litigation*, Case No. 2:19-ml-02905-JAK-JPR (C.D. Cal.). A list of the Hyundai and Kia Class Vehicles and other important information and case documents are available on the Settlement Website, **www.ACUSettlement.com**.

Class Members include all persons or entities who or which, on **April 14, 2025**, own or lease, or previously owned or leased, Hyundai and Kia Class Vehicles that were originally sold or leased in the United States or any of its territories or possessions. Eligibility will be determined by VIN. The Hyundai and Kia Class Vehicles are the:

- 2011-2019 Hyundai Sonata;
- 2011-2019 Hyundai Sonata Hybrid;
- 2018-2023 Hyundai Kona;
- 2022-2023 Hyundai Kona N;
- 2019-2021 Hyundai Veloster;
- 2010-2013 Kia Forte;
- 2010-2013 Kia Forte Koup;
- 2011-2020 Kia Optima;
- 2011-2016 Kia Optima Hybrid; and
- 2011-2012, 2014 Kia Sedona.

The Settlement provides \$62.1 million to resolve claims that the Hyundai and Kia Class Vehicles contain defective ZF-TRW airbag control units that are vulnerable to a condition called electrical overstress, which may cause the vehicles' airbags and other safety features to fail during a collision. The Settling Defendants deny the claims but have agreed to settle. The Court has not decided who is right.

The purpose of this Notice is to inform you of the proposed class action settlement so you may decide what to do. **Your legal rights under the Settlement are affected even if you do nothing, so please read this Notice carefully.**

The cash compensation available will be reimbursement for certain out-of-pocket expenses related to the Recalls and residual payments of up to \$350 for Recalled Vehicles and \$150 for Unrecalled Vehicles.

In addition to the cash payments, the Settlement provides for a New Parts Warranty for the new parts installed pursuant to the Recalls and a robust Hyundai and Kia Class Vehicle inspection program. Please visit www.ACUSettlement.com for more information.

How do I get a payment?

You must submit a claim to receive a cash payment. The claims process is easy to complete and will require basic documentation to show your out-of-pocket expenses.

To submit your claim online please visit www.ACUSettlement.com. You can also download a claim form on the Settlement Website or call to request a form and submit your claim by mail. The fastest option is to submit your claim online.

You should submit your claim now.

Claim forms must be electronically submitted or postmarked no later than **March 29, 2027**. This schedule may change, so please visit the Settlement Website regularly for updates.

What are my other options?

You may exclude yourself from or object to the Settlement by **August 25, 2025**.

If you exclude yourself, you will not receive any cash payments and you will not release any of the claims that this Settlement resolves. If you do not exclude yourself from the Settlement, you will be bound by the Court's orders and judgments like all other Class Members, even if you do not file a claim.

If you wish to object, the Court will consider your views in deciding whether to approve or reject this Settlement. If the Court does not approve the Settlement, no cash payments will be sent, and the lawsuit will continue. You cannot object if you exclude yourself from the Settlement.

For information on how to object or exclude yourself, visit www.ACUSettlement.com.

What happens next?

The Court will hold a hearing on **September 29, 2025 at 8:30 a.m. PDT**, to consider whether to grant final approval of the Settlement, award fees and costs to the attorneys representing the Class, and service awards to the Settlement Class Representatives. Co-Lead Counsel will ask the Court to award up to 33% of the Settlement Amount (*i.e.*, up to \$20,493,033.30) to cover reasonable attorneys' fees plus costs they incurred in litigating this case and securing this nationwide Settlement for the Class. Co-Lead Counsel will also ask the Court to award each of the proposed Settlement Class Representatives a service award of up

to \$2,500 each for their work in this litigation. You do not need to attend this hearing, but you are welcome to attend at your own expense. The hearing date may change, so please check the Settlement Website regularly for updates.

Questions?

Visit www.ACUSettlement.com or call 1-866-287-0740.

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MEXICO - Spanish ▾

NOTICIAS PROPORCIONADAS POR

JND Legal Administration →

25 jun, 2025, 13:25 GMT

SEATTLE, 25 de junio de 2025 /PRNewswire/ -- **JND Legal Administration**

Se ha llegado a un acuerdo de demanda colectiva propuesto en una demanda denominada *In Re: ZF-TRW Airbag Control Units Products Liability Litigation*, Caso No. 2:19-ml-02905-JAK-JPR (Distrito Central de California). En el sitio web del Acuerdo se puede consultar una lista de los vehículos Hyundai y Kia afectados, así como otra información importante y documentos relacionados con el caso, **www.ACUSettlement.com**.

Los miembros del grupo de demandantes incluyen a todas las personas o entidades que, a fecha de **14 de abril de 2025**, sean propietarios o arrendatarios o hayan sido propietarios o arrendatarios anteriormente, de vehículos Hyundai y Kia del grupo que se vendieron o arrendaron originalmente en Estados Unidos o en cualquiera de sus territorios o posesiones. La elegibilidad se determinará mediante el número de identificación del vehículo (VIN, por sus siglas en inglés) Los vehículos afectados Hyundai y Kia son los siguientes:

- 2011-2019 Hyundai Sonata;
- 2011-2019 Hyundai Sonata híbrido;
- 2018-2023 Hyundai Kona;
- 2022-2023 Hyundai Kona N;
- 2019-2021 Hyundai Veloster;
- 2010-2013 Kia Forte;
- 2010-2013 Kia Forte Koup;
- 2011-2020 Kia Optima;
- 2011-2016 Kia Optima híbrido; y
- 2011-2012, 2014 Kia Sedona.

El Acuerdo proporciona 62,1 millones de dólares para resolver reclamos de que los vehículos afectados Hyundai y Kia contienen unidades de control de bolsas de aire ZF-TRW defectuosas que son vulnerables a una condición llamada sobrecarga eléctrica, que puede hacer que las bolsas de aire de los vehículos y otras características de seguridad fallen durante una colisión. Los demandados que concilian niegan los reclamos, pero han acordado llegar a un acuerdo. El tribunal no ha decidido quién tiene razón.

El propósito de este Aviso es informarle sobre el acuerdo de demanda colectiva propuesto para que pueda decidir qué hacer. **Sus derechos legales en virtud del acuerdo se ven afectados incluso si no hace nada, así que lea atentamente este Aviso.**

La compensación en efectivo disponible consistirá en el reembolso de ciertos gastos de bolsillo relacionados con las retiradas del mercado y pagos residuales de hasta 350 dólares por los vehículos retirados y 150 dólares por vehículos no retirados.

Además de los pagos en efectivo, el Acuerdo establece una garantía de piezas nuevas para las piezas nuevas instaladas de conformidad con las retiradas del mercado y un sólido programa de inspección de vehículos afectados Hyundai y Kia. Para obtener más información, visite www.ACUSettlement.com

¿Cómo obtengo un pago?

Debe presentar una reclamación para recibir un pago en efectivo. El proceso de reclamos es fácil de completar y requerirá documentación básica para mostrar sus gastos de bolsillo.

Para enviar su reclamo en línea, visite www.ACUSettlement.com. También puede descargar un formulario de reclamo en el sitio web del Acuerdo o llamar para solicitar un formulario y enviar su reclamo por correo. La opción más rápida es enviar su reclamo en línea.

Debe enviar su reclamo ahora.

Los formularios de reclamo deben enviarse electrónicamente o tener matasellos a más tardar el **29 de marzo de 2027**. Este horario puede cambiar, por lo tanto visite el sitio web del Acuerdo regularmente para ver actualizaciones.

¿Cuáles son mis otras opciones?

Puede excluirse u objetar el Acuerdo antes del **25 de agosto de 2025**.

Si se excluye, no recibirá ningún pago en efectivo y no renunciará a ninguno de los reclamos que resuelva este Acuerdo. Si no se excluye del Acuerdo, estará sujeto a las órdenes y sentencias del tribunal como todos los demás miembros del grupo de demandantes, incluso si no presenta una reclamación.

Si desea objetar, el tribunal tendrá en cuenta su opinión al decidir si aprueba o rechaza este Acuerdo. Si el tribunal no aprueba el Acuerdo, no se enviarán pagos en efectivo y la demanda continuará. No puede objetar si se excluye del Acuerdo.

Para obtener información sobre cómo objetar o excluirse, visite www.ACUSettlement.com.

¿Y ahora qué sigue?

El tribunal celebrará una audiencia el **29 de septiembre de 2025 a las 8:30 a. m. hora de verano del pacífico**, para considerar si otorgar la aprobación final del Acuerdo, se adjudican honorarios y costas a los abogados que representan al colectivo y se conceden compensaciones por los servicios prestados a los representantes del colectivo del Acuerdo. El abogado codefensor principal solicitará al tribunal que conceda hasta el 33 % del monto del Acuerdo (*es decir*, hasta 20.493.033,30 de dólares) para cubrir los honorarios razonables de los abogados más los costos en los que incurrieron al litigar este caso y asegurar este Acuerdo a nivel nacional para el colectivo. También solicitará al tribunal que otorgue a cada

uno de los representantes del colectivo del Acuerdo, propuestos una indemnización de servicio de hasta 2.500 dólares a cada uno por su trabajo en este litigio. No es necesario que asista a esta audiencia, pero puede hacerlo si lo desea, aunque deberá correr con sus propios gastos. La fecha de la audiencia puede cambiar, por lo tanto consulte el sitio web del Acuerdo regularmente para obtener actualizaciones.

¿Tiene alguna pregunta?

Visite www.ACUSettlement.com o llame al 1-866-287-0740.

FUENTE JND Legal Administration

Pagamentos em dinheiro de até US\$ 350 e outros benefícios estão disponíveis para proprietários e arrendatários atuais e antigos elegíveis de certos veículos Hyundai e Kia

BRAZIL - Portuguese ▼

NOTÍCIAS FORNECIDAS POR
JND Legal Administration →
25 jun, 2025, 13:25 GMT

SEATTLE, 25 de junho de 2025 /PRNewswire/ -- **JND Legal Administration**

Um acordo proposto de ação coletiva foi realizado em uma ação judicial chamada *In Re: ZF-TRW Airbag Control Units Products Liability Litigation*, caso n.º 2:19-ml-02905-JAK-JPR (C.D. Cal.). Uma lista dos veículos das marcas Hyundai e Kia, além de outras informações importantes e documentos do processo, está disponível no site do acordo, **www.ACUSettlement.com**.

Os Membros da Classe incluem todas as pessoas ou entidades que, em **14 de abril de 2025**, possuam ou arrendem, ou anteriormente possuíram ou arrendaram, veículos das marcas Hyundai e Kia que foram originalmente vendidos ou arrendados nos Estados Unidos ou em qualquer um de seus territórios ou posses. A elegibilidade será determinada pelo VIN. Os veículos das marcas Hyundai e Kia são:

- 2011-2019 Hyundai Sonata;
- Hyundai Sonata Hybrid 2011-2019;
- 2018-2023 Hyundai Kona;
- 2022-2023 Hyundai Kona N;
- 2019-2021 Hyundai Veloster;
- 2010-2013 Kia Forte;
- 2010-2013 Kia Forte Koup;
- 2011-2020 Kia Optima;
- 2011-2016 Kia Optima Hybrid; e
- 2011-2012, 2014 Kia Sedona.

O Acordo fornece US\$ 62,1 milhões para resolver reclamações de que os veículos das marcas Hyundai e Kia contêm unidades de controle de airbag ZF-TRW defeituosas que são vulneráveis a uma condição chamada sobrecarga elétrica, o que pode fazer com que os airbags dos veículos e outros recursos de segurança falhem durante uma colisão. Os Réus do Acordo negam as reivindicações, mas concordaram em resolver. O tribunal não decidiu quem está certo.

O objetivo deste aviso é informá-lo sobre o acordo de ação coletiva proposto para que você possa decidir o que fazer. **Seus direitos legais sob o acordo são afetados mesmo que você não faça nada, então leia este aviso com atenção.**

A compensação em dinheiro disponível será o reembolso de certas despesas diretas relacionadas aos recalls e pagamentos residuais de até US\$ 350 para veículos recolhidos e US\$ 150 para veículos não recolhidos.

Além dos pagamentos em dinheiro, o acordo prevê uma garantia de peças novas para as novas peças instaladas de acordo com os recalls e um robusto programa de inspeção de veículos das marcas Hyundai e Kia. Acesse www.ACUSettlement.com para obter mais informações.

Como recebo um pagamento?

Você deve enviar uma solicitação para receber um pagamento em dinheiro. O processo de reivindicação é fácil de concluir e exigirá documentação básica para mostrar suas despesas diretas.



Para enviar a sua reclamação online, acesse www.ACUSettlement.com. Você também pode baixar um formulário de reivindicação no site do acordo ou ligar para solicitar um formulário e enviar sua reivindicação por correio. A opção mais rápida é enviar sua reivindicação online.

Você deveria enviar a sua reivindicação agora.

Os formulários de solicitação devem ser enviados eletronicamente ou carimbados até **29 de março de 2027**. Este cronograma pode mudar, portanto, visite o site do acordo regularmente para obter atualizações.

Quais são as minhas outras opções?

Você pode se excluir ou se opor ao acordo até **25 de agosto de 2025**.

Se você se excluir, não receberá nenhum pagamento em dinheiro e não liberará nenhuma das reivindicações que este acordo resolve. Se você não se excluir do acordo, estará vinculado às ordens e julgamentos do Tribunal, como todos os outros Membros da Classe, mesmo que não apresente uma reivindicação.

Se você desejar contestar, o tribunal considerará suas opiniões ao decidir se aprova ou rejeita este acordo. Se o tribunal não aprovar o acordo, nenhum pagamento em dinheiro será enviado e o processo continuará. Você não pode se opor caso escolha se excluir do acordo.

Para obter informações sobre como se opor ou excluir, acesse www.ACUSettlement.com.

O que acontece a seguir?

O Tribunal realizará uma audiência em **29 de setembro de 2025 às 8h30. PDT**, para considerar se deve conceder a aprovação final do acordo, conceder honorários e custos aos advogados que representam a classe, e prêmios de serviço aos representantes da classe do acordo. O advogado colíder solicitará ao tribunal que conceda até 33% do valor do acordo (*ou seja*, até US\$ 20.493.033,30) para cobrir os honorários advocatícios razoáveis, mais os custos incorridos no litígio deste caso e na garantia deste acordo nacional para a classe. O advogado principal conjunto também solicitará ao tribunal que conceda a

cada um dos representantes de classe de acordo proposto, uma concessão de serviço de até US\$ 2.500 cada por seu trabalho neste litígio. Você não precisa comparecer a esta audiência, mas pode participar por sua própria conta, se desejar. A data da audiência pode mudar, portanto, verifique o site do acordo regularmente para atualizações.

Dúvidas?

Acesse www.ACUSettlement.com ou ligue para 1-866-287-0740.

FONTE JND Legal Administration

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

*In re: ZF-TRW Airbag Control Units
Products Liability Litigation*

ALL ACTIONS AGAINST THE
HYUNDAI AND KIA
DEFENDANTS

**DECLARATION OF KIRK D.
KLECKNER IN SUPPORT OF THE
HYUNDAI-KIA PLAINTIFFS’
MOTION FOR FINAL
SETTLEMENT APPROVAL**

MDL No. 2905

I, Kirk D. Kleckner, declares as follows:

**1) Valuation Purpose, Scope and Primary Materials and Information
Considered**

- a) This declaration pertains to the valuation of the warranty benefits provided to Class Members as defined in the Settlement Agreement resolving the economic loss claims against the Hyundai and Kia Defendants¹ in *In re ZF-TRW Airbag Control Units Products Liability Litigation* (ECF No 1027-1).

¹ The Hyundai and Kia Defendants are Defendants Hyundai Motor Company, Hyundai Motor America, Kia Corporation, and Kia America, Inc.

1 The Hyundai and Kia Defendants (Defendants), and the Hyundai and Kia
2 Plaintiffs² are collectively referred to as the Parties.

- 3 b) Co-Lead Counsel on behalf of Settlement Class Counsel asked me to
4 independently value the Class Member benefits made available from this
5 class action litigation and Settlement Agreement related to the New Parts
6 Warranty for Recalled Vehicles (Recalled Vehicles Warranty Extension)³.
7
- 8 c) In conducting my work and forming my opinion, I was provided with and
9 have considered, in addition to my substantial experience in this area, the
10 materials identified in Exhibit B. I believe that the information made
11 available to me, taken as a whole, provided sufficient data from which I
12 could draw a valid valuation conclusion, subject to the Valuation Primary
13 Assumptions and Limiting Conditions (*See* Section 7).
- 14 d) My Summary of Opinions, Experience and Qualifications, Valuation
15 Approaches, Information Requested, Valuation Methodology and Valuation
16 Conclusion, Valuation Primary Assumptions and Limiting Conditions, and
17 Certifications and Representations are profiled below.
- 18 e) In addition, Co-Lead Counsel asked me to independently estimate the value
19 of the potential Class Member benefits made available from this class action
20 litigation and Settlement Agreement related to the New Parts Warranty for
21 Unrecalled Vehicles (Unrecalled Vehicles Warranty Extension)⁴. The
22

24 ² The Hyundai and Kia Plaintiffs are Larae Angel, Bobbi Jo Birk-LaBarge, John Colbert, Brian
25 Collins, Gerson Damens, Bonnie Dellatorre, Dylan DeMoranville, Joseph Fuller, Tina Fuller,
26 Lawrence Graziano, Michael Hernandez, Kinyata Jones, Diana King, Richard Kintzel, Carl Paul
27 Maurilus, Kenneth Ogorek, Burton Reckles, Dan Sutterfield, Amanda Swanson, and Lore Van
Houten.

28 ³ Settlement Agreement Section III F.1-4.

⁴ Settlement Agreement Section III F.5.

1 Prospective Calculated Value, subject to Hypothetical Assumptions and
2 Conditions, is provided as supplementary information in Section 8.

3 **2) Summary of Opinions**

4 a) Based on the analyses explained below, I have determined within a
5 reasonable degree of professional certainty that the value of the Settlement
6 Agreement's Recalled Vehicles Warranty Extension exceeds \$13,600,000.
7

8 b) Additionally, as explained below, the Prospective Calculated Value for the
9 Unrecalled Vehicles Warranty Extension, subject to the Hypothetical
10 Assumptions and Conditions described in Section 8 below, exceeds
11 \$50,500,000.

12 **3) Experience and Qualifications**

13 a) I am a Certified Public Accountant - Retired in the United States with an
14 MBA. Prior to retirement I was an Accredited Senior Appraiser (ASA-BV)
15 from the American Society of Appraisers. I have litigation-related experience
16 in valuing economic losses, damages and intangible assets.
17

18 b) My experience includes seven years as the Chief Financial Officer (CFO) for
19 a well-respected Top 50 United States automotive dealership group; 19 years
20 with an accounting firm including roles as shareholder, Chief Operating
21 Officer, and Director of Business Valuation and Litigation Support Services;
22 and performing services for hundreds of companies in a wide array of
23 industries, including but not limited to retail dealerships, property and
24 casualty insurance, warranty insurance, and distribution.

25 c) As CFO of an automotive dealership group, I worked on service and
26 warranty matters. My duties as CFO included establishing and overseeing
27 extended service contractual relationships, and establishing and overseeing
28

1 automotive dealer-owned reinsurance entities and structures for extended
2 service warranty contracts and other insurance-related products.

3 d) My experience as an expert includes numerous warranty extension valuations
4 including the following automotive warranty related class action settlement
5 valuation determinations: 1) Valuation of the Extended New Parts Warranty
6 provided by the Toyota ZF-TRW Airbag Control Units class action
7 settlement agreement⁵; 2) Valuation of the nationwide Warranty Extension
8 and other class member benefits provided for by the Volkswagen and Audi
9 Warranty Extension class action settlement agreement (VW/Audi) related to
10 extension of the warranty concerning an alleged engine sludge defect⁶; 3) the
11 valuation of the Customer Support Program related class member benefits
12 provided for class members nationwide by the Toyota-United States class
13 action settlement agreement (Toyota-US) related to the warranty extension
14 concerning an alleged unintended acceleration defect⁷, and the Customer
15 Support Program in the Toyota-Canadian class action settlement agreement
16 (Toyota-Canadian)⁸; and 4) valuation of the Customer Support Programs
17 related class member benefits provided for by each of class action settlement
18 agreements in various vehicle manufacturer Takata Airbag class actions⁹.

19 e) My curriculum vitae is attached as Exhibit A.
20

21 ⁵ *In re: ZF-TRW Airbag Control Units Products Liability Litigation*, Case No. 2:19-ml-02905-
22 JAK-JPR (“MDL”)

23 ⁶ The United States District Court District of Massachusetts, *In re Volkswagen and Audi*
Warranty Extension Litigation, Docket No. 1:07-md-01790

24 ⁷ Central District Of California, Southern Division, *In Re: Toyota Motor Corp. Unintended*
25 *Acceleration Marketing, Sales Practices, and Products Liability Litigation*, United States District
Court, Case No. 8:10ML2151 JVS (FMOx)

26 ⁸ Canadian Toyota Unintended Acceleration Marketing, Sales Practices, And Products Liability
27 Litigation Settlement Agreement (various courts)

28 ⁹ The United States District Court for the Southern District of Florida, *In Re: Takata Airbag*
Products Liability Litigation, Case 1:15-Md-02599 (Settlement Agreements for BMW, Mazda,
Subaru, Toyota, Honda, Nissan, Ford, Volkswagen Group, and Audi)

1 **4) Valuation Approaches**

- 2 a) In valuing intangible assets, valuation analysts typically apply one or more of
3 three common approaches: the Market Approach, the Income Approach, and
4 the Cost Approach.
- 5 b) The Market Approach estimates a value for the subject intangible asset based
6 on an analysis of prices that similar intangible assets are sold in the
7 marketplace.
- 8 i) For the Recalled Vehicles Warranty Extension valuation, the Market
9 Approach is applied since extended service contracts (ESCs)¹⁰ are
10 purchased in the marketplace by vehicle owners and prior courts have
11 subscribed to the belief that market prices are accurate in assessing the
12 value benefits to the class¹¹.
- 13 c) The Income Approach may be applicable when the intangible asset is
14 income-producing. Warranty extensions do not produce income, so this
15 approach is not applicable.
- 16 d) The Cost Approach derives the cost that a developer would incur to create an
17 intangible asset with equivalent utility. The estimate of the retail price that a
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19

20 ¹⁰ An extended service contract, sometimes called an extended warranty or plan, provides a
21 warranty on certain vehicle parts beyond the coverage of the vehicle’s original standard
22 manufacturer warranty. Typical ESC levels of coverage vary from “power train only” up to full
23 “bumper to bumper.” The ESC is a contractual agreement between the vehicle owner and the
24 ESC obligor (typically an independent warranty / insurance company or manufacturer affiliated
25 warranty / insurance company). Consumers typically purchase an ESC from a dealer at the point
26 of vehicle purchase.

27 ¹¹ OPINION AND ORDER, JOSEPH A. O’KEEFE Plaintiff v. MERCEDES-BENZ USA, LLC
28 Defendant, Civil Action No. 01-CV-2902, Civil Action No. 03-CV-1480, 214 F.R.D. 266, 305
(E.D. Pa. April 2, 2003), United States District Court, E.D. Pennsylvania, – “We believe that the
benefits to the class are most accurately measured by making an estimation of the Extended
Coverage Program’s market price. We realize that this figure is difficult to estimate because the
Extended Coverage Program—or any similar warranty product—is not on the market. Yet,
economists, actuaries, investors and businesspeople must estimate and value risk in all types of
market transactions. A warranty is simply the ex ante market price of insuring against a
foreseeable risk. Any other measure except the market price would over or underestimate the
benefit to the class.”

1 developer would make the intangible asset available to the marketplace is
2 derived by estimating build-up components that include direct costs, indirect
3 costs and the developer's profit/opportunity cost, which is an expected
4 "return" on all the costs. The Cost Approach is typically not as accurate as
5 the Market Approach since the Cost Approach is an indirect estimate of the
6 intangible asset's retail price versus the Market Approach utilizes prices
7 directly from the retail marketplace. I did not apply the Cost Approach since
8 reliable marketplace price data was available to apply the Market Approach.

9 **5) Information Requested**

10 a) I requested the following information from the Parties:

11 i) To make the Recalled Vehicles Warranty Extension determination:

12 (1) The assumed effective date of the Recalled Vehicles Warranty
13 Extension valuation.

14 (2) A copy of the final Settlement Agreement with exhibits.

15 (3) A copy of the Preliminary Approval Order Date.

16 ii) To determine the number of Subject Vehicles to receive settlement
17 benefits and number of Recalled Vehicles Warranty Extension coverage
18 years:

19 (1) The number of Subject Vehicles originally sold, by Model Year and
20 Model.

21 (2) Confirmation that the following categories of Subject Vehicles that are
22 excluded under the terms of the Settlement Agreement represent less
23 than one percent of Subject Vehicles originally sold: 1) rebuilt or
24 flood-damaged vehicles, 2) vehicles with altered mileage, racing or
25 similarly modified vehicles intended for non-street use, 3) Class
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- 1 Members expected to request exclusion, and 4) vehicles owned by
2 excluded parties (Hyundai and Kia, Court, and Plaintiffs' Counsel).
- 3 (3) The New Passenger Vehicle Limited Warranty coverage (e.g., 4-Year /
4 50,000 mile) for each of the Subject Components, by Model Year and
5 Model.
- 6
7 (4) The coverage term (e.g., 1-Year) for the standard Hyundai and Kia
8 service and parts warranties and confirmation that the service and parts
9 warranties apply to the Recall Remedy parts installed.
- 10 (5) An estimate of the percentage of Recalled Vehicles that had the
11 Recalled Remedy completed as of the Preliminary Approval Order
12 Date and an estimate of the same percentage as of one year prior to
13 that date.
- 14 iii) To gain an understanding of Recalled Vehicles Warranty Extension's
15 claim dollar exposure for the Subject Components:
- 16 (1) Hyundai and Kia's current or recent U.S. average dealer warranty
17 claim dollars and labor hours to replace each of the Subject
18 Components. List separately the warranty claim amounts for each of
19 labor hours, parts dollars, and other costs dollars.
- 20
21 (2) Hyundai and Kia's U.S. average per hour dealer warranty labor
22 reimbursement rate for the most recent annual period available.
- 23 iv) To assess the consumer value proposition of extended service contracts
24 sold under the Hyundai and Kia brand names: 1) the current purchase
25 price paid by Hyundai and Kia dealers for a one-year "Platinum" level
26 Vehicle Service Agreement (zero deductible or \$100 deductible if zero is
27 not available) and 2) any applicable coverage milage limitations to cover
28 each of the following used vehicles:

1 (1) Kia Optima, Model Year 2017, with 97,500 miles

2 (2) Kia Optima Hybrid, Model Year 2017, with 97,500 miles

3 (3) Hyundai Sonata, Model Year 2017, with 97,500 miles

4 (4) Hyundai Sonata Hybrid, Model Year 2017, with 97,500 miles

5
6 v) To provide the Prospective Calculated Value for the Unrecalled Vehicles
7 Warranty Extension:

8 (1) The number of Unrecalled Subject Vehicles originally sold, by Model
9 Year and Model.

10 (2) The New Passenger Vehicle Limited Warranty coverage for the
11 Unrecalled Subject Vehicles (e.g., 4-Year / 50,000 mile) for each of
12 the Subject Components, by Model Year and Model.

13 (3) Hyundai and Kia's current or recent U.S. average dealer warranty
14 claim dollars and labor hours to replace each of the Subject
15 Components for the Unrecalled Subject Vehicles. List separately the
16 warranty claim amounts for each of labor hours, parts dollars, and
17 other costs dollars.
18

19 b) Although some of the information requested was not available, I believe that
20 the information provided to me, taken as a whole and supplemented by my
21 extensive knowledge of the industry and other extended service contract
22 market price data, provided sufficient data from which I could draw valid
23 valuation conclusions.

24
25 **6) Recalled Vehicles Warranty Extension – Valuation Methodology and**
26 **Valuation Conclusion**

27 a) I considered relevant sections of the Settlement Agreement to identify
28 Warranty Extension coverage terms, limitations, and conditions (Key

1 Coverage Elements). The following section in italics are the primary
2 Settlement Agreement provisions pertinent to my analysis:

3 i) *“Recalls” means NHTSA Recall No. 18v-137 and NHTSA Recall No. 18v-*
4 *363.*

5 ii) *“Recalled Vehicles” means all Subject Vehicles that are subject to a*
6 *Recall as listed in Exhibit 2.*

7 iii) *“Remedy” or “Recall Remedy” means the repair and/or countermeasures*
8 *performed to address the Recall on the Recalled Vehicles.*

9 iv) *“Subject Vehicles” means those Hyundai and Kia vehicles listed on*
10 *Exhibit 2 that contain or contained ZF-TRW ACUs and were distributed*
11 *for sale or lease in the United States or any of its territories or*
12 *possessions.*

13 v) *New Parts Warranty:*

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15
16 (1) *If the Court grants final approval of the Settlement, Hyundai and Kia*
17 *shall provide a warranty for the new parts installed pursuant to the*
18 *Recalls to address potential airbag non-deployment due to electrical*
19 *overstress for ten (10 years from the date of the Preliminary Approval*
20 *Order).*

21 (2) *The New Parts Warranty will cover repairs or replacement (including*
22 *parts and labor) that become necessary due to a defect in a new part*
23 *installed pursuant to the Recalls. For example, if a problem with a*
24 *part installed pursuant to the Recalls causes the airbag warning light*
25 *to illuminate, the New Parts Warranty shall cover the repair or*
26 *replacement of that part.*

27 (3) *A Class Member’s rights under this Section III.F and the New Parts*
28 *Warranty are transferred with the Subject Vehicle.*

1 (4) *Inoperable or junkyard vehicles, vehicles with a scrapped, salvaged,*
2 *rebuilt, or flood-damaged title, vehicles with altered mileage, racing*
3 *or similarly modified vehicles intended for non-street use or vehicles*
4 *that are dismantled, crushed, or fire damaged, are not eligible for the*
5 *New Parts Warranty.*

6 vi) *Exhibit 2 - Subject Vehicles – Recalled Vehicles.*

7
8 b) I considered market retail prices that vehicle owners pay for ESCs. I utilized
9 such market price data to estimate what Class Members would pay to
10 purchase a Hypothetical Extended Service Contract (Hypothetical ESC) that
11 is equivalent to the financial protection resulting from the existence of the
12 Recalled Vehicles Warranty Extension. This methodology that I
13 incorporated into my valuation has been accepted by many courts, including
14 this Court for the Toyota Settlement in this case; this approach has also been
15 relied upon by courts and parties in the *VW/Audi, Toyota-US, Toyota-*
16 *Canadian* and *Takata Airbag* class actions mentioned in Section 3 above.
17 Thus, I employed methods and analyses of a type reasonably relied upon by
18 courts in the United States and abroad, and experts in my field, in forming
19 opinions or inferences on the subject.

20 i) In developing the market (or retail) prices of the Hypothetical ESCs, my
21 determinations included the following:

22 (1) Defining the Recalled Vehicles Warranty Extension's Covered
23 Components.

24 (2) Deriving the consumer's current expected Retail Repair Cost to
25 replace the Covered Components if the Recalled Vehicles Warranty
26 Extension did not exist.
27
28

- 1 (3) Considering the magnitude of the current Retail Repair Cost when
2 deriving the retail price of a one-year Hypothetical ESC that is
3 equivalent to the Recalled Vehicles Warranty Extension.
- 4 (4) Deriving a reasonable estimate of the retail price of a one-year, zero-
5 deductible, transferable, extended service contract (ESC) coverage by
6 considering the following market-based price data sets:
- 7 (a) Summary claim information provided by vehicle manufacturers
8 enabling the determination of ‘per year’ retail costs consumers
9 would have paid for repair work if not for the existence of
10 applicable new vehicle warranties, as a percentage of the average
11 retail prices paid for the underlying new vehicles.
- 12 (b) Pricing information from major national third-party warranty
13 companies, enabling the derivation of retail prices paid for ESCs as
14 a percentage of the retail prices paid for the underlying pre-owned
15 vehicles.
- 16 (c) Pricing information provided by vehicle manufacturers enabling the
17 analysis of the retail prices of manufacturer-branded ESCs as a
18 percentage of the retail prices paid for the underlying pre-owned
19 vehicles.
- 20 (c) I determined the number of estimated Covered Vehicles for each model year
21 by adjusting the number of Class Vehicles originally sold that could benefit
22 from the Settlement Agreement for the declining number on the road over
23 time by utilizing vehicle survivability data from the National Highway
24 Traffic Safety Administration (NHTSA).
- 25 (d) I derived the number of Recalled Vehicles Warranty Extension coverage
26 years (Coverage Years) for each model year by applying the Key Coverage
27
28

1 Elements as provided for in the Settlement Agreement and summarized in
2 Section 6(a) above.

3 e) Exhibit D provides the Recalled Vehicle Warranty Extension Valuation
4 Summary and Conclusion, displaying the results from my underlying
5 calculations:

6 i) Estimated Covered Vehicles: The estimated number of Covered Vehicles
7 (B) that will benefit from the Recalled Vehicles Warranty Extension was
8 derived by considering NHTSA vehicle survivability data (see Section
9 6(c)).

10 ii) Estimated Coverage Years: The Coverage Years (D) is calculated as the
11 number of Estimated Covered Vehicles by model year (B) multiplied by
12 the number of Estimated Coverage Years that the Recalled Vehicles
13 Warranty Extension would cover for each model year (C) (see Section
14 6(d)).

15 iii) Estimated Value of Benefits: The Estimated Value of Benefits by Model
16 Year (F) is calculated as the Estimated Coverage Years (D) multiplied by
17 the Estimated Per Year Hypothetical ESC Market Price (E) (see Section
18 6(b)).

19 f) My Valuation Conclusion for the Recalled Vehicles Warranty Extension:
20

21 i) I have determined within a reasonable degree of professional certainty
22 that the value of the Settlement Agreement's Recalled Vehicles Warranty
23 Extension exceeds \$13,600,000.
24

25 **7) Valuation Primary Assumptions and Limiting Conditions**

26 a) My analyses, opinion, and conclusion are limited only by the Valuation
27 Primary Assumptions and Limiting Conditions outlined in Exhibit C,
28

1 including that the calculations assume a Valuation Effective Date of April 14,
2 2025.

3 **8) Supplementary Information: Unrecalled Vehicles Warranty Extension –**
4 **Prospective Calculated Value**

5 a) Co-Lead Counsel requested that I separately provide the estimated value of
6 the Unrecalled Vehicles Warranty Extension which I calculated utilizing a
7 similar methodology to that used in the valuation provided above for the
8 Recalled Vehicles Warranty Extension and therefore is subject to relevant
9 Primary Assumptions and Limiting Conditions used therein. In addition, the
10 Unrecalled Vehicles Warranty Extension Prospective Calculated Value is
11 subject to the Hypothetical Assumptions and Conditions described below in
12 Section 8(c).

13
14 b) I considered additional relevant sections of the Settlement Agreement to
15 identify Unrecalled Vehicles Warranty Extension coverage terms,
16 limitations, and conditions. The following section in italics are the primary
17 Settlement Agreement provisions pertinent to the calculations:

18 *i) New Parts Warranty:*

19 *(1) In the event the ZF-TRW ACUs in Unrecalled Vehicles are recalled in*
20 *the future, Hyundai and Kia shall extend the New Parts Warranty's*
21 *coverage for the parts installed pursuant to the future recall, subject to*
22 *the terms of this Section III.F, except that the New Parts Warranty's*
23 *coverage will be for ten (10 years from the date of the future recall).*

24 *ii) Exhibit 2 - Subject Vehicles – Unrecalled Vehicles.*

25
26 c) While applying a similar methodology to my approach for the Recalled
27 Vehicles Warranty Extension, the Prospective Calculated Value for the
28 Unrecalled Vehicles Warranty Extension is subject to the following

1 Hypothetical Assumptions and Conditions that were provided by Co-Lead
2 Counsel:

- 3 i) Unrecalled Vehicles are assumed to be recalled.
4
5 ii) Unrecalled Vehicles Warranty Extension average effective coverage years
6 is assumed to be ten years with a starting date of April 14, 2027.
7
8 iii) The Retail Repair Cost to replace the Covered Components if the
9 Unrecalled Vehicles Warranty Extension did not exist is assumed to be
10 the same as that derived for the Recalled Vehicles.
11
12 d) Unrecalled Vehicle data requested was provided for the number of Subject
13 Vehicles by Model Year and Model.
14
15 e) Exhibit E provides the Unrecalled Vehicle Warranty Extension Prospective
16 Calculated Value, displaying the results from my underlying calculations in
17 the same format as Exhibit D.
18
19 f) The Prospective Calculated Value for the Unrecalled Vehicles Warranty
20 Extension, subject to the Hypothetical Assumptions and Conditions outlined
21 above, exceeds \$50,500,000. However, given the prospective nature of these
22 benefits and their valuation, if the actual facts and circumstances vary
23 significantly from the Hypothetical Assumptions and Conditions described in
24 Section 8(c), the result could vary significantly from this Prospective
25 Calculated Value.

26 **9) Certifications and Representations**

- 27 a) The statements of fact in this declaration are true and correct.
28
29 b) These are my personal, impartial, and unbiased professional analyses,
30 opinions, and conclusions, all of which are stated to a reasonable degree of
31 professional certainty.

1 c) I do not have any bias, present interest, or prospective interest with respect to
2 this matter, or any bias or personal interest with respect to the parties
3 involved with this assignment.

4 d) My engagement in this assignment and the compensation for completing this
5 assignment is not contingent upon the development or reporting of a
6 predetermined value or any direction in value, the amount of the value
7 opinions, the attainment of a stipulated result, or the occurrence of a
8 subsequent event directly related to the intended use of this valuation. For my
9 work in this matter, I was compensated at my typical hourly rate of \$350.

10 I declare under penalty of perjury under the laws of the State of Florida that
11 the foregoing is true and correct. Executed this on the 11th day of July 2025 at
12 Lakewood Ranch, Florida.

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Kirk D. Kleckner

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EXHIBIT A – Curriculum Vitae of Kirk D. Kleckner CPA-Retired MBA ASA-BV

CURRICULUM VITAE OF KIRK D. KLECKNER CPA-RETIRED, MBA

Kirk is currently:

- Principal of ValuationUSA - a valuation, succession planning and litigation support firm serving closely held businesses and their owners

Kirk's experience includes:

- Seven years as Chief Financial Officer for a well-respected Top 50 dealership group known for its world class customer experiences and business processes
- Nineteen years with an accounting firm including roles as shareholder, Chief Operating Officer, and Director of Business Valuation and Litigation Support Services. Kirk provided consulting work for hundreds of companies in an array of industries including but not limited to retail dealership, casualty insurance, distribution, manufacturing, construction, insurance, reinsurance, service, non-profit, bank, retail, tool and die, technology, trucking and warehouse

Kirk is an MBA and was an Accredited Senior Appraiser in Business Valuation (ASA-BV) from the American Society of Appraisers.



Kirk's expertise leverages both his professional and hands-on industry experience as a Chief Financial Officer for a \$500 million-dollar business. Kirk's expertise and experience includes buying, selling and integrating of businesses; managing businesses; succession planning, business and intangible asset valuation for strategic transactions; income, gift and estate tax; owner transactions and litigation purposes.

Kirk is a qualified expert witness with experience in complex business litigation, economic damages calculations, business and intangible asset valuation, owner disputes and lost profits. Kirk has testified as an expert and served as a valuation expert in many matters with damage awards exceeding \$100,000,000.

Kirk is known nationally for his expertise in the automotive industry. Representative matters include: In re Volkswagen & Audi Warranty Extension Litigation (MDL 1790); In re: Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Products Liability Litigation (No. 8:10ML2151 JVS); Canadian Toyota Unintended Acceleration Marketing, Sales Practices, And Products Liability Litigation Settlement Agreement (various courts); and In Re: Takata Airbag Products Liability Litigation, Case 1:15-Md-02599 (Settlement Agreements for BMW, Mazda, Subaru, Toyota, Honda, Nissan, Ford, Volkswagen Group and Audi).

STATEMENT OF QUALIFICATIONS

Academic and Professional Credentials

- **ASA-BV RETIRED** – formerly an Accredited Senior Appraiser-Business Valuation, American Society of Appraisers
- **MBA** - Master of Business Administration, Concentration Finance, University of Minnesota
- **CPA Retired** - Certified Public Accountant, State of Minnesota
- Bachelor of Arts, Accounting and Business Administration, Wartburg College

Positions and Experience

Principal – ValuationUSA (2008) – Professional services consulting firm specializing in the following areas:

- succession planning, owner wealth accumulation, preservation and transfer planning
- business and intangible asset valuation
- gift and estate tax
- strategic acquisition and divestiture transactions
- value enhancement
- expert opinions – litigation, economic loss / damage analysis and independent opinions / expert testimony

President – Automotive Development Group Capital and Consulting, LLC (2009) – Business specializing in helping dealership groups and their owners with profit and valuation enhancement, valuation, expert witness and business succession planning.

Executive Vice President and Chief Financial Officer - Walser Automotive Group, Minneapolis, MN (2000–2007) - Automobile dealership group with related leasing, collision repair, reinsurance and real estate operations (\$500 million of revenues, fourteen locations and 750 employees)

Chief Operating Officer, Director of Valuation and Consulting Department, and Shareholder - Wilkerson, Guthmann + Johnson, Ltd., St. Paul, MN (1981 – 2000) - Public accounting firm with 40 members and offices in St. Paul, Blaine and Minneapolis. *Industries Served:* Auto dealership, casualty insurance, manufacturing, construction, insurance, service, non-profit, bank, retail, trucking and warehouse.

Professional Affiliations

American Society of Appraisers, a former member and an Accredited Senior Appraiser- Business Valuation (ASA-BV) - ASA is an organization of appraisal professionals. The ASA promotes the exchange of ideas and experiences among its members; maintains the Principles of Appraisal Practice and Code of Ethics for the guidance of its members; maintains universal recognition that members of the Society are objective, unbiased appraisers and consultants, and awards professional designations to qualified members.

Select Presentations

- *Business Value: What Leads to a High-Performance Manufacturing Business?*, 2016 Minnesota Manufacturing Executives, Minneapolis, MN
- *Eight Characteristics of High Value Dealerships*, 2014 Michigan Automotive Dealers Conference, Livonia, MI
- *Eminent Domain Asset Identification, Classification and Valuation*, Eminent Domain 2011: Essential Updates and Issues, Hennepin County Bar Association, Minneapolis, MN
- *Eight Characteristics of High Value Dealerships (And Why Dealers Should Care About Them)*, 2010 AICPA Auto Dealership Conference, Phoenix, AZ
- *AICPA / ASA Business Conference Review*, American Society of Appraisers, Minneapolis, MN
- *Fourteen Evolving Dealership Strategies*, Chicago Automobile Trade Association / Compli, Chicago; Dealer Driving Force Group, Charlotte, NC
- *Integrating Business Value Creation and Tax Planning*, 2010 Management & Business Advisers Conference, MN Society of CPAs, Minneapolis, MN
- *Tax Reduction Strategies for Today's Business Environment*, M&I Bank
- *What Leads to Dealership High Performance*, The New Dealership Era Symposium Sponsored by Compli and Wells Fargo, Bloomington, MN
- *Business and Real Estate Valuation Timely Opportunities*, Thrivent Financial Annual Meeting, Roseville, MN
- *Business Valuation for Attorneys*, Various
- *Understanding Financial Statements for Attorneys*, Various

Select Appraisal and Litigation Support Education

- S-Corp Valuations: Avoiding the Chaos and Selecting the Proper Methodology, 2021
- 4 Critical Factors to Create Sustainable Growth, 2021
- Aligning Budgets to Strategy, Key to Long Term Profitability, 2020
- Succession Planning and Knowledge Capture/Transfer, 2020
- Advanced Topics in Business Valuation, 2019
- AICPA Global Manufacturers and Controllers Conference, 2019
- Confessions of Two Reluctant Expert Witnesses, 2019
- Economic Damages - Reasonable Certainty, Lost Profits and Intellectual Property 2019
- Valuation for M&A, 2019
- AICPA National Dealership Conference, 2021, 2018, 2016, 2010, 2002
- Appraising Real Estate Centered Entities by Business Appraiser, 2018
- Valuing Small Businesses Worth Less Than \$10 Million, 2018
- The Role of IRS Revenue Rulings and Tax Court Cases in Business Valuation, 2018
- The Impact of TCIA on Cost of Capital, 2018
- Key Tax Law Changes That Impact Business Valuation, 2018
- Valuing Non-Controlling Interests in S-Corps For Federal Tax Purposes, 2017
- Best Income Tax, Estate Tax and Financial Planning Ideas, 2017, 2013
- Fairness and Solvency Opinions Advanced Issues and Best Practices, 2017, 2010
- Valuing Undivided Interests in Real Estate, 2016
- A Detailed Look at Terminal Value Estimation, 2016
- Complying With USPAP in the Litigation Setting, 2016
- MNCPA Business Valuation Conference, 2020, 2016, 2015, 2013, 2009, 2008
- MNCPA Annual Tax Conference, 2015, 2009, 2005, 2001, 1999
- ASA Advanced Business Valuation Conference, 2015, 2008
- Discounts for Lack of Marketability, 2015, 2008
- ASAMN Annual Business Valuation Conference, 2015, 2014, 2008
- Price and Value: Discerning the Difference, 2015
- USPAP for Business Valuation, 2020, 2014, 1996
- Michigan CPA Automobile Dealers Conference, 2014
- Buying and Selling a Privately-Owned Business, 2014
- Valuing Early Stage Companies, 2013
- Special Topics in the Valuation of Intangible Assets, 2012
- Using Market Data to Support Real Estate Partnership Discounts, 2012
- Reasonable Compensation, 2011, 2010, 2008
- AICPA National Business Valuation Conference, 2011, 2008
- 20th Annual National Expert Witness Conference, 2011
- Pluris Discount for Lack of Marketability Study Results, 2010
- Valuation Issues in Estate and Gift Tax, 2010
- Reconciling the Lack of Marketability Discount Theories, 2009
- Cost of Capital, 2008
- Multi-Dealership CFO Conference, 2003, 2002

EXHIBIT B – Primary Materials and Information Considered

- Settlement Agreement Case 2:19-ml-02905-JAK-JPR, March 17, 2025
- Order RE: Motion for Preliminary Approval of Class Settlement and Direction of Notice Under FED. R. CIV. P. 23(E)(DKT.1027), April 14, 2025
- Responses to Information Requests – May and June 2025
- Hyundai Motor America Part 573 Safety Recall Report 18V-137, February 27, 2018
- Kia Motors America Part 573 Safety Recall Report 18V-363, June 1, 2018
- Hyundai America’s Best Warranty Information <https://www.hyundaiusa.com/us/en/assurance/america-best-warranty>
- NHTSA <https://www.nhtsa.gov/>
- Google Search <https://www.google.com/>
- EPA Emissions Warranties for 1995 and Newer Light-duty Cars and Trucks under 8,500 Pounds GVWR, October 2015
- Results of research regarding U.S. inoperable vehicles and vehicles with salvaged, rebuilt or flood-damaged titles
- Results of research regarding U.S. vehicle survivability, age and miles driven
- *Vehicle Survivability and Travel Mileage Schedules*, January 2006. National Highway Traffic Safety Administration
- Various interviews with extended service contract professionals familiar with the U.S. markets
- Various interviews with parts and service professionals familiar with the U.S. vehicle service department pricing, operations and warranty versus retail pricing rates
- Various analyses of retail market price relationships between pre-owned vehicle purchase prices and extended service contract purchase prices
- Various analyses of retail market price relationship between new vehicle purchase prices and vehicle manufacturer new vehicle warranty costs
- New vehicle warranty terms and conditions for various manufacturers
- Allstate vehicle service agreements and prices

- C.N.A. National Warranty Corporation vehicle service agreements and prices
- Protective vehicle service agreements and prices
- Various warranty insurance company state filings showing rate filings and rate manual guidelines
- Extended service contract information for various vehicle manufacturer programs

EXHIBIT C –Valuation Primary Significant Assumptions and Limiting Conditions

- My calculations assume a Valuation Effective Date of April 14, 2025, for the Recalled Vehicles Warranty Extension. The calculations reflect facts and conditions existing at the Effective Date. Subsequent events were not considered, and I have no obligation to update this affidavit for such events and conditions.
- Information provided by the Defendants and the Plaintiffs' Counsel is accurate and responsive to the information request. I did not audit or verify such information. Accordingly, I provide no guarantee as to the accuracy or completeness of such information.
- I have assumed that the Defendants and their dealership networks will honor the intent and terms of the Settlement's New Parts Warranty.
- While I believe my valuation conclusions are valid, I reserve the right to submit a revised valuation to consider new information and/or to correct any inadvertent errors or omissions given the complexity of this valuation.
- Possession of this declaration, or a copy thereof, does not carry with it the right of publication of all or part of it, nor may it be used for any purpose by anyone without the previous written consent of VUSA. This valuation declaration is valid only for the purpose specified herein.

Exhibit D**Recalled Vehicle Warranty Extension Valuation Summary and Conclusion**

<u>Estimated Covered Vehicles</u>		<u>Estimated Coverage Years</u>		<u>Valuation Summary</u>	
Model Year	Number of Vehicles	Average Coverage Years by Model Year	Coverage Years	Estimated Per Year Hypothetical ESC Market Price	Estimated Value of Benefits By Model Year
(A)	(B)	(C)	(D) (B X C = D)	(E)	(F) (D X E = F)
2010	31,800	9.66	307,200	\$2.79	\$ 857,100
2011	178,100	9.66	1,720,400	\$2.79	\$ 4,799,900
2012	203,500	9.66	1,965,800	\$2.79	\$ 5,484,600
2013	90,500	9.66	874,200	\$2.79	\$ 2,439,000
	<u>503,900</u>		<u>4,867,600</u>		<u>\$ 13,580,600</u>
Valuation Conclusion					\$ 13,600,000

Exhibit E**Unrecalled Vehicle Warranty Extension Prospective Calculated Value**

<u>Estimated Covered Vehicles</u>		<u>Estimated Coverage Years</u>		<u>Valuation Summary</u>	
Model Year	Number of Vehicles	Average Coverage Years by Model Year	Coverage Years	Estimated Per Year Hypothetical ESC Market Price	Estimated Value of Benefits By Model Year
(A)	(B)	(C)	(D) (B X C = D)	(E)	(F) (D X E = F)
2011	36,300	10.00	363,000	\$2.79	\$ 1,012,800
2012	34,100	10.00	341,000	\$2.79	\$ 951,400
2013	83,600	10.00	836,000	\$2.79	\$ 2,332,400
2014	118,000	10.00	1,180,000	\$2.79	\$ 3,292,200
2015	176,900	10.00	1,769,000	\$2.79	\$ 4,935,500
2016	206,300	10.00	2,063,000	\$2.79	\$ 5,755,800
2017	219,500	10.00	2,195,000	\$2.79	\$ 6,124,100
2018	282,400	10.00	2,824,000	\$2.79	\$ 7,879,000
2019	300,600	10.00	3,006,000	\$2.79	\$ 8,386,700
2020	165,100	10.00	1,651,000	\$2.79	\$ 4,606,300
2021	64,200	10.00	642,000	\$2.79	\$ 1,791,200
2022	60,900	10.00	609,000	\$2.79	\$ 1,699,100
2023	62,000	10.00	620,000	\$2.79	\$ 1,729,800
	<u>1,809,900</u>		<u>18,099,000</u>		<u>\$ 50,496,300</u>
Calculated Value					\$ 50,500,000