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Attorneys for Plaintiffs and the Certified Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

BEATRICE PARKER and JEFFREY
GURULE, SR, on behalf of themselves, and
all others similarly situated, and all aggrieved
employees,

Plaintiff,

v.

CHERNE CONTRACTING
CORPORATION; and DOES 1 through 10,
inclusive,

Defendants.

Case No: 4:18-cv-01912-HSG

CLASS AND REPRESENTATIVE ACTION

**DECLARATION OF SCOT D.
BERNSTEIN IN SUPPORT OF
PLAINTIFFS' MOTION FOR AWARD OF
ATTORNEYS' FEES AND COSTS, CLASS
REPRESENTATIVE INCENTIVE
PAYMENTS, GENERAL RELEASE
PAYMENTS, AND SETTLEMENT
ADMINISTRATION COSTS**

Date: December 2, 2021
Time: 2:00 p.m.
Ctrm: 2
Judge: Haywood S. Gilliam, Jr.

Complaint Filed: February 13, 2018
TAC filed: November 23, 2020

1 I, Scot Bernstein, declare:

2 1. I am an attorney licensed to practice in the Courts of the State of California. My
3 firm, Law Offices of Scot D. Bernstein, A Professional Corporation, is co-counsel for Plaintiffs
4 Beatrice Parker and Jeffrey Gurule, Sr. ("Plaintiffs") and the proposed class in this action. I have
5 personal knowledge of the facts set forth herein and if called to testify I could and would testify
6 under oath as to those facts.

7 2. I studied engineering and economics at UCLA, earning a bachelor's degree in
8 1977. I attended Boalt Hall School of Law (now known as U.C. Berkeley School of Law) and
9 received my JD degree in 1980. I have practiced law in California since being admitted to the
10 State Bar in 1980. I have extensive experience representing employees, investors and consumers
11 in litigation and in private contractual arbitration proceedings. I have substantial experience in
12 wage-and-hour and privacy class actions as well. A copy of my curriculum vitae is attached to
13 this declaration as Exhibit "1."

14 3. Through August 26, 2021, as shown in Exhibit "2," I spent approximately 242.1
15 hours litigating this case.

16 4. During the time period through September 12, 2021, Mr. Grover and I have
17 discussed and analyzed key decisions that were made throughout the course of this case and in
18 connection with its settlement. A bullet-point summary of some of the necessary tasks engaged
19 in by my office in prosecuting this action follows:

- 20 • Communications with co-counsel analyzing the potential case;
- 21 • Review and analysis of documents pertinent to the case;
- 22 • Review and revision of the PAGA letter;
- 23 • Review and revision of and comments regarding the first, second and third
24 amended complaints;
- 25 • Review and revision of multiple drafts of the opposition to defendant's motion to
26 dismiss;
- 27 • Review and revision of the outline for the opposition to defendant's motion for
28 summary judgment;
- 29 • Review and revision of multiple drafts of Plaintiff's opposition to defendant's

1 motion for summary judgment and of a declaration in support of Plaintiff's
2 opposition;

- 3 • Review and revision of four drafts of Plaintiff's motion for class certification;
- 4 • Review and revision of six declarations in support of that motion and review and
5 revision of the proposed order;
- 6 • Review and revision of three drafts of Plaintiff's reply in support of class
7 certification;
- 8 • Review and revision of the mediation information request;
- 9 • Review and revision of the mediation brief and a mediation brief supplement;
- 10 • Analysis of settlement valuation and review and revision of damage calculations
11 for use at the mediation;
- 12 • Review of documents and communications with co-counsel in preparation for the
13 mediation;
- 14 • Attending two mediations approximately 21 months apart;
- 15 • Review and revision of the settlement memorandum of understanding;
- 16 • Review and revision of the settlement stipulation and class notice; and
- 17 • Addressing other, smaller matters along the way that required my time and focus
18 as well.

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20 5. Class counsel advanced all expenses and handled this case on a wholly contingent
21 basis. To date, my office has advanced \$17,232.76 in unreimbursed expenses in this case, as
22 follows:

23 Mediators	\$ 5,397.33
24 Mileage	121.05
25 Bridge Tolls and Parking	55.00
26 Expense Reimbursements to Co-Counsel for Approximately Half of Theretofore-Expended Filing Fees, Court Reporting Fees, Air Fare, 27 Lodging and FedEx/Postage	11,500.00
28 <u>Mediation Conference Room</u>	<u>159.38</u>
29 Total	\$17,232.76

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6. My hours as described above and in Exhibit 2 do not include any work done by
paralegals or by secretaries or other clerical personnel. My practice is to maintain my time
records by contemporaneously recording on paper the date, the client identification and the time
devoted to any given task or tasks. My time is recorded in tenths of hours.

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7. My billing practice, whether for contingent or non-contingent litigation, is to
review all time entries carefully. Time that, in my opinion, was not spent effectively is not
recorded or is written off.

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8. My billing rate is \$900 per hour. That rate does not include any multiplier or
other fee enhancement, and does not take into account the risks or delays in payment associated
with working on a contingency basis. The bulk of my cases are in the San Francisco Bay Area
and southern California. Based on the billing rates of other firms with which I am familiar and
the detailed information on billing rates provided in the Declaration of Eric A. Grover in Support
of Plaintiffs' Motion for Award of Attorneys' Fees and Costs, Class Representative Incentive
Payments, General Release Payments, and Settlement Administration Costs, I believe that my
rate is reasonable and well within the range of prevailing market rates for private attorneys in
California with similar experience and expertise conducting non-contingent litigation in
California.

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9. Based on my 242.1 hours expended through August 26, 2021, my Lodestar as of
that date was \$ 217,890.00.

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I declare under penalty of perjury under the laws of the State of California and the
United States that the foregoing is true and correct and that this declaration was executed on
September 13, 2021, in El Dorado Hills, California.


Scot Bernstein

EXHIBIT 1

SCOT D. BERNSTEIN
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Mr. Bernstein has practiced law in California since 1980. His practice emphasizes class actions on behalf of employees who have been denied overtime pay, expense reimbursements or other compensation that is owed to them as well as the representation of investors and consumers who are victims of fraud, misrepresentation and fiduciary abuse. He also has served as counsel in class actions and other litigation involving privacy violations, unfair competition, unlawful business practices and false advertising.

Education. Mr. Bernstein studied engineering and economics at UCLA, where he received his bachelor's degree *Magna Cum Laude* in 1977 and was an officer of the UCLA chapter of Tau Beta Pi, the engineering honors society. He was a member of Omicron Delta Epsilon (economics honors society) and Phi Beta Kappa as well. He received his Juris Doctor degree at Boalt Hall School of Law (now known as Berkeley Law), University of California at Berkeley, in 1980.

Class Actions. Mr. Bernstein's primary practice focus is class action cases. He has been co-lead counsel in many, which are listed beginning on page 6 under "**Class Actions.**"

Employment Arbitration. Mr. Bernstein was co-counsel for the plaintiff in *Chester v. iFreedom Communications, Inc., et al.*, Los Angeles County Superior Court Case Number BC353567, in which judgment was entered for more than \$4.1 billion dollars, together with interest of \$1,125,159.97 per day, confirming a JAMS arbitration award in favor of the plaintiff.

He recently represented an employee in FINRA arbitration as well, serving as co-counsel in a USERRA case and obtaining a favorable award on behalf of a U.S. Army captain against Morgan Stanley Smith Barney and Citigroup Global Markets.

Reported Cases. Mr. Bernstein has served as co-counsel in successful federal and state appeals and published decisions:

Kirby v. Immoos Fire Protection, Inc. (2012) 53 Cal.4th 1244 (co-counsel for successful appellants)

Stop Youth Addiction v. Lucky Stores, 17 Cal.4th 553, 950 P.2d 1086, 71 Cal.Rptr.2d 731 (1998) (attorney for amicus curiae in support of successful appellant)

Lippitt v. Raymond James Financial Services, et al., 340 F.3d 1033 (9th Cir. 09/22/2003) (co-counsel for successful appellant)

Gutierrez v. Brand Energy Services of California, Inc. (2020) 50 Cal. App. 5th 786, *modified by and rehearing denied by Gutierrez v. Brand Energy Serv. of Cal., Inc.* 2020 Cal. App. LEXIS 619 (Cal. App. 1st Dist., July 2, 2020) (co-counsel for successful appellant)

Lazarin et al. v. Total Western, Inc. (2010) 188 Cal.App.4th 1560, 116 Cal.Rptr.3d 596, review denied, Jan. 19, 2011, S188164 (co-counsel for successful appellant)
Meyer v. Irwin Industries, Inc., 723 F. Supp. 2d 1237 (C.D. Cal. 2010) (co-counsel for successful plaintiff)

Securities Arbitration. Mr. Bernstein has represented investors in securities arbitration proceedings for more than eighteen years. During that time, he has handled investor claims before FINRA (formerly known as “NASD”), the New York Stock Exchange, the Pacific Exchange and the American Arbitration Association. He has obtained compensation for his clients from firms large and small, including huge Wall Street firms such as Morgan Stanley, Merrill Lynch, PaineWebber and Salomon Smith Barney; “high-payout” firms with large numbers of small offices, including Financial Network Investment Corporation, Sunamerica Securities, Securities America and IFG Network Securities; and “boiler room” firms and their personnel, including the infamous Stratton Oakmont, the firm depicted in “The Wolf of Wall Street.”

Expert Testimony. Mr. Bernstein has testified as an expert witness and/or provided consultation in matters involving securities law and franchise law violations, breach of fiduciary duty and elder abuse.

Bar Association Activities. Mr. Bernstein serves on the board of directors of the California Employment Lawyers Association (“CELA”), an association of more than a thousand attorneys dedicated to representing employees in employment disputes. He currently co-chairs and participates actively on CELA’s Legislative Committee and serves on its Wage and Hour Committee as well. In 2009, Mr. Bernstein completed eleven years as a director of the Public Investors Arbitration Bar Association (“PIABA”), a national association of attorneys dedicated to the representation of investors in disputes with the securities industry. He served three years as PIABA’s treasurer, has served on and chaired and has continued to serve on a number of PIABA committees, and is a director emeritus of PIABA. He has given continuing legal education lectures to the State Bar of California, CELA, the North American Securities Administrators Association (“NASAA”), PIABA and other professional groups on employees’ rights under the wage and hour laws, investors’ rights and remedies, and privacy law. He is a member of the National Employment Lawyers Association (“NELA”), Consumer Attorneys of California (“CAOC”), the American Association for Justice (“AAJ”) and the Taxpayers Against Fraud Education Fund (“TAFEF”) as well.

Honors and Awards. Mr. Bernstein was selected as a Northern California Super Lawyer in 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020 and 2021.

Continuing Legal Education Speaking Engagements and Published Chapters of Course Materials. Mr. Bernstein's speaking engagements and published chapters and sections of continuing legal education materials include the following:

Privacy and Cybersecurity Law 101, presented by Mr. Bernstein as part of a panel at the State Bar of California’s 89th Annual Meeting

Annual Employment Law Update (Part 2), presented by Mr. Bernstein as part of a panel at the California Employment Lawyers Association's 29th Annual Meeting

Senate Bill 462 or How I Learned to Stop Worrying and Love 218.5, presented by Mr. Bernstein as part of a panel he moderated at the California Employment Lawyers Association Advanced Wage and Hour Seminar (April 2014) and previously the subject of his presentation in a California Employment Lawyers Association Webinar (December 2013)

Broker Promissory Notes: Economics, Policy, and Offsets under the Wage-and-Hour Laws, PIABA Nineteenth Annual Meeting (October 2010)

Avoiding the Uncollectible Judgment: Clues at the Case Intake Stage, California Employment Lawyers Association Advanced Wage and Hour Seminar (May 2009)

Stacking the Deck in Arbitrator List Selection: A Study in Regulatory Failure and A Practical Look at the Consequences, PLI Securities Arbitration 2007 (August 2007)

Broker Liability Insurance from the Claimant's Perspective, PLI Securities Arbitration 2003 (August 2003)

Unpaid Awards and Investor Protection: Identifying the Continuing Problem and Collecting What Is Due, PIABA Fifteenth Annual Meeting (October 2006) (co-authored with C. Thomas Mason III)

Arbitrating at the AAA: Differences from SRO Arbitration and Other Points of Interest, PIABA Fourth Annual California Mid-Year Meeting (March 2006)

Maximizing Investor Recoveries: Errors & Omissions Insurance and Net Capital, PIABA California Third Annual Mid-Year Meeting: Securities Arbitration Update (March 2005) (co-authored with C. Thomas Mason III)

Broker Liability Insurance in Securities Arbitration, PIABA California Second Annual Mid-Year Meeting: Securities Arbitration Update (February 2004)

Your Clients' Right to a Hearing, PIABA Twelfth Annual Meeting (October 2003)

Your Clients' Right to a Hearing, PIABA California Mid-Year Meeting: Securities Arbitration Update (February 2003)

Understanding NLSS or How I Learned To Stop Worrying and Love List Selection, PIABA Ninth Annual Meeting (October 2000)

Making, Combating and Replying to Dispositive Motions, PIABA Seventh Annual Meeting (October 1998)

Published Articles. Mr. Bernstein's published articles and other writings include the following:

Time To Prepare For California's New Consumer Finance Law, Law 360 (December 17, 2020) (co-authored with Eric A. Grover)

In California, Off The Clock Is No Longer On The Table, Employment Law 360 (January 28, 2020) (co-authored with Eric A. Grover)

ABA Federal Labor Standards Legislation Committee, *2015 FLSA Mid-Winter Report*, Contributor

Tampering with List Selection by Enhancing the Appointment Frequency of "Chair-Qualified" Arbitrators, 13 PIABA Bar Journal, no. 2, pp. 13-28 (Summer 2006)

View from the West: Unpaid Securities Arbitration Awards: Proposed Solutions to the Problem, 11 PIABA Bar Journal, no. 1, pp. 35-50 (Spring 2004)

View from the West: Things Every Arbitrator Should Know, 10 PIABA Bar Journal, no. 2, pp. 21-35 (Summer 2003)

View from the West: Should You Challenge an Arbitrator for Cause or Make a Motion or Request for Recusal?, 10 PIABA Bar Journal, no. 1, pp. 71-78 (Spring 2003) (co-authored with Tracy Pride Stoneman)

View from the West: The California Situation: More Questions than Answers (concerning the battle over California's arbitrator ethics standards), 9 PIABA Bar Journal, no. 4, pp. 47-56 (Winter 2002)

View from the West: Causal Challenges and the Chinese Wall, 9 PIABA Bar Journal, no. 3, pp. 11-13 (Fall 2002)

Brief Spotlight: The Inapplicability of Statutes of Limitation on Actions to Private Contractual Arbitration Proceedings, 9 PIABA Bar Journal, no. 2, pp. 79-85 (Summer 2002)

View from the West: Getting Paid – Parts 1 & 2 (concerning securities brokers' liability insurance), 9 PIABA Bar Journal, no. 1, pp. 37-39 (Spring 2002) and no. 2, pp. 55-60 (Summer 2002)

Brief Spotlight: Your Clients' Right to a Hearing, 9 PIABA Bar Journal, no. 1, pp. 42-47 (Spring 2002)

NASD Intake Staff Harassment of Public Customers, 6 The PIABA Quarterly, no. 1, pp. 8-10 (March 1999)

NASD Lists of Arbitrators' Closed Cases Exclude Cases Resolved by Granting 'Dismissal Motions', 5 The PIABA Quarterly, no. 4, p. 8 (December 1998)

NASD Policy of Granting Certain Causal Challenges by Securities Industry Respondents, 5 The PIABA Quarterly, no. 4, p. 11 (December 1998)

NASD 'Streamlining' of the Arbitrator Pool, 5 The PIABA Quarterly, no. 4, p. 17 (December 1998)

Bad Investments and the Medical Profession – Parts 1 and 2, 43 Sacramento Medicine 24-26 (March 1992) and 23-24 (April 1992)

Choosing a Form of Business Entity, 4 Weekly Bulletin, no. 14, pp. 6-7 (1990)

Selected Comment Letters to Government Agencies. Mr. Bernstein's comment letters to government agencies on behalf of bar associations or on his own behalf include the following:

[Comment Letter regarding California Labor Commissioner's Proposed Employee Travel Reimbursement Regulations, Written by Mr. Bernstein on behalf of the California Employment Lawyers Association., February 6, 2007](#)

[Public Comment Letter to U.S. Securities and Exchange Commission Regarding Dispositive Motions \(Motions to Dismiss\) in NASD Securities Arbitration, September 24, 2006](#)

[Public Comment Letter to U.S. Securities and Exchange Commission Regarding Tampering with NASD Arbitrator List Selection by Enhancing the Appointment Frequency of "Chair Qualified" Arbitrators, May 26, 2006](#)

[Public Comment Letter to U.S. Securities and Exchange Commission in Response to and Commenting on NASD's Partial Amendment No. 7, Amendments to the NASD Code of Arbitration Procedure for Customer Disputes, File No. SR-NASD-2003-158, October 20, 2006](#)

[Public Comment Letter to U.S. Securities and Exchange Commission Regarding Reform of Public Reporting of Misconduct of Associated Persons, April 17, 2009](#)

[Public Comment Letter to U.S. Securities and Exchange Commission Regarding BrokerCheck and the CRD: The Broader Picture, September 24, 2009](#)

Pro Bono Activities. Mr. Bernstein's other *pro bono* activities have included authoring or co-authoring amicus letters in support of California Supreme Court review in cases including *Iskanian v. CLS Transp. Los Angeles, LLC*, and *Flores v. West Covina Auto Group*; authoring an amicus letter on behalf of the California Employment Lawyers Association ("CELA") in support of publication of the California Court of Appeal's decision in *Oregel v. PacPizza, LLC*, No. A141947 (Cal. Ct. App. May 1, 2015), which was certified for publication on June 1, 2015; commenting extensively on proposed rule changes published for public comment by the U.S. Securities and Exchange Commission; working directly with the Financial Industry Regulatory Authority ("FINRA," formerly known as the "NASD") to change practices that have not been the subject of formal rulemaking; authoring a comment letter for CELA regarding travel expense reimbursement regulations proposed by the California Division of Labor Standards Enforcement; participating extensively in CELA's Legislative Committee efforts, including testifying in

numerous Senate and Assembly committee hearings regarding bills that CELA supported or opposed; drafting language for California SB 462, which changed Labor Code section 218.5 from a two-way fee-shifting statute into a de facto one-way-only statute; working extensively on California SB 707, which protects employees and consumers forced into arbitration proceedings in which the party that drafted the arbitration clause is derailing the arbitration by failing to pay arbitration fees; persuading a California state senator to withdraw a 2010 bill that would have created a broad new exemption from qualification of securities under the California Corporate Securities Law, and helping to defeat 2012, 2013, 2014 and 2015 attempts to enact similar exemptions or their functional equivalent; commenting on federal agencies' proposed regulations under the Federal Cave Resources Protection Act; and appearing for more than six years as a regular guest on "Ask a Lawyer," a live call-in television program in the Sacramento area.

Class Actions.

- a. *Tommie Pennywell-Foster v. Imko Workforce Solutions, et al.*, Sacramento County Superior Court Case No. 34-2019-00252683;
- b. *Kindt v. Concesionaria Vuela Compañía de Aviación S.A.P.I. de C.V., et al.*, Napa County Superior Court Case No. 19CV000373;
- c. *Butler, et al. v. Apple Inc.*, Santa Clara Superior Court Case No. 14-cv-262989;
- d. *Binda v. International Wood Industries, Inc., et al.*, Stanislaus County Superior Court Case No. 9000204;
- e. *Kindt and Pappas v. Aerovias de Mexico, S.A. de C.V., et al.*, San Bernardino County Superior Court Case No. CIVDS1809416;
- f. *Rabanal v. P.F. Chang's China Bistro, et al.*, Alameda County Case No. RG17851208;
- g. *Spitzer, et al v. FRHI Hotels & Resorts (Canada) Inc.*, San Bernardino County Superior Court Case No. CIVDS1712220
- h. *Halkola v. Fisher Sand & Gravel Co.*, Alameda County Superior Court Case No. RG17844100
- i. *Reed v. Tanco Engineering, Inc.*, Alameda County Superior Court Case No. RG14-743559
- j. *Nguyen v. Vantiv, Inc., et al.*, United States District Court, Northern District of California Case No. 3:15-cv-02436-LB
- k. *Roberts v. Wyndham Hotels and Resorts LLC, et al.*, United States District Court, Northern District of California Case No. 5:12-cv-05083-PSG

- l. *McCabe, et al. v. Six Continents Hotels, Inc.*, United States District Court, Northern District of California Case No. 12-cv-04818-NC
- m. *Ginn, et al. v. Certified Safety Specialists, LLC, et al.*, Contra Costa County Superior Court Case No. C11-0969
- n. *DeLeon, et al. v. NCR Corp.*, San Bernardino County Superior Court Case No. CIVDS1403274
- o. *Nguyen v. Equilon Enterprises LLC*, United States District Court, Northern District of California Case No. 4:12-cv-04650-YGR
- p. *Martin v. AltairStrickland, LLC*, Alameda County Superior Court Case No. RG11-575618
- q. *Vasquez, et al. v. Turnaround Welding Services, Inc.*, Contra Costa Superior Court Case No. MSC12-00340
- r. *Tate v. Wyatt Field Services Co.*, Alameda County Superior Court Case No. RG 10-522846
- s. *Hernandez v. Bodell Construction Company*, Alameda County Superior Court Case No. RG12-624600
- t. *Canales, et al. v. Electrical & Instrumentation Unlimited of California, Inc.*, Kern County Superior Court Case. No. S-1500-CV-271947 WDP
- u. *Lazarin, et al. v. Total Western, Inc.*, JAMS Case No. 1100067385
- v. *Meyer v. Irwin Industries, Inc.*, ADRS Case No. 11-3844-RAH
- w. *Martin, et al. v. Starcon International, Inc.*, Contra Costa County Superior Court Case No. MSC10-01071
- x. *Placer Title Company Wage and Hour Cases* (Coordinated Proceedings of *Shults v. Placer Title Co.* and *Nazeri v. Placer Title Co.*), Sacramento County Case No. JCCP 4567
- y. *Martin v. Total Safety U.S., Inc.*, Alameda County Case No. RG 10-533750
- z. *Jordan v. Directory Distributing Associates, Inc.*, San Francisco County Case No. CGC 10-500633
- aa. *Davis and Duke v. Plant Performance Services LLC, et al.*, Alameda County Case No. RG 10-501301
- bb. *Strickland, et al. v. Timec Company, Inc., et al.*, San Francisco County Case No. CGC 10-501832
- cc. *Matrix Wage and Hour Cases*, California Judicial Council Coordination Proceeding Number 4610

- dd. *Lee v. Marshalls of California LLC*, Alameda County Case No. RG 07-337021
- ee. *Drew v. HCR Manor Care Medical Services of Florida, LLC, et al.*, San Francisco County Case No. CGC 09-490181
- ff. *Ronald Hart and Judy Vezeau v. K Mart Corporation, et al*, Los Angeles County Superior Court Case Number BC 347079
- gg. *Ahmed Ali, et al, v. Morton's of Chicago/Sacramento, Inc.*, Sacramento County Superior Court Case Number 04AS04417
- hh. *Lori Davis, et al v. Apollo Group, Inc., University of Phoenix, Inc., et al*, Solano County Superior Court Case Number FCS018663
- ii. *Jaime Salgado, et al v. Driveline Retail Merchandising, Inc., et al / Shane Brady, et al v. Storecast Merchandising Corporation, et al*, Sacramento County Superior Court Consolidated Case Numbers 34-2008-00006420 and 06AS02125
- jj. *Cliver, et al v. Rainbow Apparel Company*, U.S. District Court, Northern District of California, Civil Action Number C 99-4425 PJH.

EXHIBIT 2

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August 27, 2021

Statement of Services (Interim)
Beatrice Parker and Jeffrey Gurule, Sr.
v.
Cherne Contracting Corporation

17 0000	Cherne	2017	
17 0912	Cherne	Review documents from E. Grover regarding new case; emails regarding same.	0.4
17 0912	Cherne	Review collective bargaining agreement; email with questions regarding same.	0.6
17 0913	Cherne	Review and revise representation agreement and check same; emails regarding same.	0.5
17 0915	Cherne	Review and sign representation agreement; emails regarding same.	0.2
17 0918	Cherne	Review final representation agreement	0.2
17 1213	Cherne	Emails regarding PAGA letter and review timekeeping document.	0.2
17 1214	Cherne	Review and revise PAGA letter and email regarding same.	1.5
17 1215	Cherne	Review draft 3 of PAGA letter; research regarding multiple Labor Code sections; email regarding same	0.5
17 1218	Cherne	Email regarding caller	0.1
18 0000	Cherne	2018	
18 0206	Cherne	Emails regarding complaint	0.2
18 0209	Cherne	Email regarding reviewing first amended complaint	0.1
18 0216	Cherne	Email regarding complaint.	0.1
18 0217	Cherne	Emails regarding first amended complaint and PAGA letter.	0.2
18 0219	Cherne	Review and revise first amended complaint and research regarding same and email.	4.8
18 0219	Cherne	Review changes in PAGA letter.	0.1
18 0224	Cherne	Email to R. Spencer regarding final complaint.	0.1
18 0226	Cherne	Review final, filed complaint against previous draft.	0.2
18 0319	Cherne	Emails regarding possible additional case.	0.2

18 0320	Cherne	Research and email regarding Labor Code section 1197.1	0.3
18 0322	Cherne	Emails regarding master labor agreement	0.2
18 0323	Cherne	Telephone conference with E. Grover regarding Labor Code section 1197.1	0.1
18 0327	Cherne	Emails regarding possible second case.	0.2
18 0329	Cherne	Email regarding removal; review declaration	0.2
18 0501	Cherne	Review defendants' motion to dismiss/motion to compel arbitration and supporting documents; email regarding same.	0.5
18 0502	Cherne	Emails regarding arguments.	0.2
18 0502	Cherne	Review points and authorities; notes and emails regarding same.	1.8
18 0502	Cherne	Review and revise draft opposition to motion to dismiss	3.3
18 0503	Cherne	Conference call with E. Grover and E. Acevedo to plan opposition brief	0.9
18 0507	Cherne	Emails regarding opposition to motion to dismiss	0.1
18 0509	Cherne	Review outline; emails regarding same	0.3
18 0516	Cherne	Email regarding removal; telephone conference with E. Grover	0.2
18 0523	Cherne	Review and revise opposition to motion to dismiss; emails regarding same	5.6
18 0524	Cherne	Telephone conference with E. Grover regarding opposition to motion to dismiss; email with E. Acevedo regarding same	0.2
18 0711	Cherne	Emails regarding hearing	0.2
18 1007	Cherne	Review documents regarding status of case	0.2
19 0000	Cherne	2019	
19 0206	Cherne	Emails regarding second amended complaint	0.2
19 0210	Cherne	Review redline of second amended complaint versus first amended complaint and analyze same; review Labor Code sections 1197, 1197.1, 1198 and 1199; emails regarding same	1.4
19 0210	Cherne	Review and revise second amended complaint and email regarding same	1.9
19 0213	Cherne	Emails regarding mediation	0.2
19 0214	Cherne	Email and telephone conference with E. Grover regarding mediators	0.2
19 0215	Cherne	Review mediation information request and final PAGA letter and second amended complaint	0.2
19 0216	Cherne	Review and revise mediation information request, including second review of the court's ruling on the motion to dismiss; email regarding same	2.5
19 0223	Cherne	Email regarding mediation	0.2
19 0324	Cherne	Review and revise mediation brief	2.5

19 0326	Cherne	Emails and telephone conference with E. Grover regarding possible new mediation date	0.2
19 0329	Cherne	Telephone conference and emails with E. Grover regarding new mediation date	0.2
19 0402	Cherne	Telephone conferences with E. Grover and research regarding mediator	0.4
19 0424	Cherne	Email regarding pre-mediation conference call	0.2
19 0426	Cherne	Research regarding information from Defendant; review same and email regarding same; additional emails	1.2
19 0429	Cherne	Emails regarding conference call	0.2
19 0501	Cherne	Prepare for conference call	0.1
19 0501	Cherne	Review E. Grover's letter to opposing counsel and markup of mediation information request; memo regarding same; telephone conference with E. Grover; additional email regarding same	0.2
19 0501	Cherne	Conference call regarding mediation and damages	0.8
19 0503	Cherne	Emails regarding mediation brief	0.2
19 0506	Cherne	Emails regarding mediation brief and JAMS bill	0.3
19 0506	Cherne	Review mediation brief	0.4
19 0506	Cherne	Review damage calculations; email regarding same	0.9
19 0507	Cherne	Telephone conferences with E. Grover regarding Cherne conference call	0.3
19 0507	Cherne	Conference call with Judge Freedman and opposing counsel	0.3
19 0507	Cherne	Emails regarding mediation	0.1
19 0507	Cherne	Review damage calculation sheet and revise same; email regarding same	1.8
19 0512	Cherne	Review removal documents in preparation for mediation	0.2
19 0513	Cherne	Email regarding mediation brief; telephone conference with E. Grover regarding defendants' brief; review and revise plaintiff's supplemental mediation brief and emails regarding same	1.0
19 0513	Cherne	Travel time to San Francisco	2.2
19 0513	Cherne	Additional emails and review supplemental brief	0.2
19 0514	Cherne	Travel time to mediation	0.6
19 0514	Cherne	Attend mediation	5.5
19 0514	Cherne	Travel time to Sacramento from mediation	2.2
19 0524	Cherne	Emails regarding proposed briefs	0.1
19 0609	Cherne	Review emails regarding briefing	0.1
19 0610	Cherne	Emails regarding E. Grover's briefing proposal	0.2
19 0611	Cherne	Review I. Spiro email regarding collective bargaining agreements, minimum wage and Armenta v. Osmose	0.1

19 0614	Cherne	Emails regarding discovery; review initial disclosures	0.3
19 0620	Cherne	Emails regarding discovery	0.2
19 0703	Cherne	Emails regarding stipulation and proposed order	0.2
19 0709	Cherne	Emails regarding proposed order; telephone conference with E. Grover regarding emails	0.3
19 0710	Cherne	Emails regarding initial disclosures	0.2
19 0715	Cherne	Emails regarding discovery and initial disclosures; review initial disclosures	0.4
19 0716	Cherne	Emails regarding denial of extension regarding certification motion	0.2
19 0718	Cherne	Emails regarding conference call and regarding possible date change	0.3
19 0719	Cherne	Conference call regarding discovery; emails regarding same	0.6
19 0720	Cherne	Review and analyze Griffin v. Sachs and email analyzing travel time issues	0.4
19 0724	Cherne	Review defendant's initial disclosures; emails regarding conference call	0.3
19 0726	Cherne	Telephone conference with E. Grover and opposing counsel regarding discovery; telephone conference with E. Grover regarding same and research ideas regarding same; email regarding same	0.7
19 0729	Cherne	Email regarding discovery	0.2
19 0730	Cherne	Emails regarding discovery	0.1
19 0805	Cherne	Email regarding and review deposition notice	0.2
19 0808	Cherne	Emails regarding discovery	0.1
19 0809	Cherne	Emails regarding discovery	0.2
19 0810	Cherne	Review defendant's discovery responses	0.4
19 0812	Cherne	Telephone conference with E. Grover regarding defendant's discovery responses	0.1
19 0813	Cherne	Review Nextar certification order; email to E. Grover regarding same	0.2
19 0814	Cherne	Review discovery requests to plaintiff; email from Judge Freedman	0.3
19 0819	Cherne	Telephone conferences with E. Grover; email regarding same	0.6
19 0820	Cherne	Emails regarding discovery; telephone conference with E. Grover	0.4
19 0821	Cherne	Email and texts regarding conference call regarding sampling putative class	0.2
19 0823	Cherne	Conference call with E. Grover and opposing counsel; telephone conference with E. Grover regarding same and email regarding same	0.2
19 0826	Cherne	Email regarding lack of wage statements	0.2
19 0826	Cherne	Review and revise declaration regarding motion to amend scheduling order	1.0

19 0827	Cherne	Emails regarding wage statements; email from E. Grover regarding my edits and telephone conference with E. Grover regarding same; additional emails; review declaration	0.6
19 0827	Cherne	Review and revise draft motion and order regarding deadlines for class certification motion; email regarding same	1.6
19 0828	Cherne	Emails regarding motion regarding schedule; telephone conferences with E. Grover and R. Spencer regarding August 29 deposition; texts regarding same	0.3
19 0829	Cherne	Emails; review 082615 Rosenfeld letter regarding travel time (produced by defendant)	0.7
19 0829	Cherne	Additional emails regarding deposition and documents	0.2
19 0830	Cherne	Review responses to plaintiff's request for production of documents; emails regarding depositions in Minnesota and California	0.2
19 0903	Cherne	Emails regarding discovery	0.3
19 0905	Cherne	Email regarding discovery	0.1
19 0906	Cherne	Telephone conferences with E. Grover regarding letter to putative class members	0.3
19 0906	Cherne	Draft, review, revise and email E. Grover regarding letter to class members	1.1
19 0906	Cherne	Email regarding class list and review same	0.2
19 0912	Cherne	Emails with R. Spencer regarding caller	0.2
19 0916	Cherne	Telephone conference with E. Grover regarding conference call regarding request for additional time regarding certification motion; email regarding certification as a pleading question	0.4
19 0916	Cherne	Additional emails regarding deposition changes and motion to continue	0.2
19 0917	Cherne	Emails	0.1
19 0918	Cherne	Review emails, review attachment and email regarding same; emails regarding certification motion schedule	0.4
19 0919	Cherne	Emails regarding new deadlines; telephone conference with E. Grover regarding same; emails regarding paystubs and vacation pay	0.3
19 0921	Cherne	Emails regarding discovery	0.2
19 0923	Cherne	Emails regarding discovery	0.1
19 0924	Cherne	Telephone conference with E. Grover regarding class certification motion and briefing schedule	0.2
19 0930	Cherne	Email regarding documents from defendant	0.2
19 1003	Cherne	Emails regarding second class representative and J. Sagafi	0.2
19 1004	Cherne	Emails regarding conference call	0.3

19 1007	Cherne	Telephone conference with E. Grover regarding Clayborne (J. Sagafi); review complaint; additional telephone conference with E. Grover regarding same	0.9
19 1008	Cherne	Emails regarding conference call	0.1
19 1009	Cherne	Telephone conferences with E. Grover and R. Jung and email to R. Spencer regarding reviewing all of court's certification orders	0.6
19 1009	Cherne	Telephone conference with E. Grover and conference call with E. Grover, J. Sagafi et al and follow-up telephone conference with E. Grover regarding Owens Chevron/Cherne filing	1.1
19 1009	Cherne	Draft representation agreement for Mr. Gurule; email regarding same	1.0
19 1010	Cherne	Review and email regarding SB 688 and AB 673, signed today	0.2
19 1010	Cherne	Review and revise Cherne/Gurule representation agreement and telephone conference with E. Grover regarding same	0.9
19 1015	Cherne	Review and sign Gurule representation agreement; email regarding same; emails regarding third-amended-complaint redlines	0.4
19 1016	Cherne	Emails regarding third amended complaint; review and assemble final/signed representation agreement	0.6
19 1021	Cherne	Review proposed order regarding leave to amend	0.2
19 1025	Cherne	Email regarding and receive Cherne motion for certification and E. Grover declaration	0.2
19 1027	Cherne	Review and revise certification motion	5.6
19 1028	Cherne	Telephone conference with E. Grover and meeting with E. Grover regarding certification motion edits	0.4
19 1030	Cherne	Review and revise certification motion; email regarding same; telephone conferences with E. Grover regarding same	2.3
19 1031	Cherne	Review deposition errata from defendant	0.1
19 1031	Cherne	Emails regarding conference call	0.1
19 1031	Cherne	Conference call with E. Grover and R. Spencer regarding brief	0.5
19 1031	Cherne	Review E. Grover draft 3 redline and comments	1.4
19 1031	Cherne	Review additional declarations; email to E. Grover	0.1
19 1101	Cherne	Emails regarding declarations and motion for certification	0.2
19 1103	Cherne	Review and revise declarations of Gurule, Gray, Webber and Asiegbu; emails regarding same	2.8
19 1104	Cherne	Emails regarding certification motion and declarations	0.4
19 1105	Cherne	Review emails and declarations	0.4
19 1105	Cherne	Extensive revision of motion for certification	5.3

19 1106	Cherne	Emails regarding non-named plaintiff as class representative and other approaches	2.0
19 1106	Cherne	Review and revise Gurule, Grey, Webber and Asiegbu declarations; emails regarding same	2.3
19 1107	Cherne	Emails regarding Gurule declaration and review same	0.2
19 1107	Cherne	Emails regarding filing and review of documents	0.3
19 1107	Cherne	Review and revise B. Parker declaration	2.2
19 1107	Cherne	Additional emails regarding brief and regarding certification and review redline of draft 7 versus draft 8	0.6
19 1107	Cherne	Additional emails regarding and review reply regarding motion to amend complaint	0.2
19 1108	Cherne	Review and revise class certification motion; emails regarding same	6.8
19 1110	Cherne	Emails regarding motion for certification	0.1
19 1110	Cherne	Draft and finalize SDB declaration regarding certification; email regarding same and regarding exhibit 1	0.3
19 1110	Cherne	Revise Exhibit B and emails to E. Grover regarding E. Grover declaration	2.0
19 1110	Cherne	Review and revise drafts 10 and 11 of certification motion and draft draft 12; email regarding same	5.8
19 1111	Cherne	Revise and finalize declaration; emails regarding certification motion; review draft 14 and redline against draft 12	0.8
19 1111	Cherne	Additional telephone conference with E. Grover regarding same; additional file review; additional emails regarding Exhibit U and proposed order	0.4
19 1112	Cherne	Emails regarding certification motion; telephone conferences with E. Grover; review supplemental discovery response	0.4
19 1114	Cherne	Email from R. Spencer	0.1
19 1117	Cherne	Review notes for consideration regarding reply re certification	0.2
19 1122	Cherne	Telephone conference with E. Grover regarding discovery/deposition status and regarding certification motion and reply	0.2
19 1126	Cherne	Emails regarding new documents from defendant	0.2
19 1127	Cherne	Emails regarding and review documents from defendant	0.2
19 1213	Cherne	Review Cherne deposition notices and responses to requests for production of documents	0.2
19 1216	Cherne	Emails regarding costs; emails regarding opposition to certification motion	0.2
19 1217	Cherne	Telephone conference with E. Grover regarding reply; emails regarding same	0.3
19 1218	Cherne	Emails regarding 12/24 onference call regarding reply	0.1

19 1224	Cherne	Review opposition to certification; notes regarding same	1.2
19 1224	Cherne	Conference call with E. Grover, R. Spencer and A. Barnes regarding same	0.9
19 1224	Cherne	Additional telephone conference with E. Grover regarding same	0.2
19 1226	Cherne	Emails regarding additional discovery	0.2
19 1227	Cherne	Email regarding document request/subpoena	0.1
19 1230	Cherne	Emails regarding reply	0.1
20 0000	Cherne	2020	
20 0103	Cherne	Email regarding depositions; telephone conference with E. Grover; review notes	0.4
20 0104	Cherne	Review and revise certification reply outline; email regarding same	4.1
20 0105	Cherne	Telephone conference with E. Grover regarding reply re certification; emails from A. Barnes and E. Grover and review attachments; additional emails and attachment	1.1
20 0106	Cherne	Emails regarding reply and depositions	0.2
20 0107	Cherne	Emails regarding depositions and discovery	0.3
20 0107	Cherne	Review Ridgeway v. Walmart pages 37-42; email regarding same	0.5
20 0110	Cherne	Telephone conference with E. Grover; obtain additional discovery	0.3
20 0110	Cherne	Review and revise reply	5.7
20 0111	Cherne	Review transcripts of depositions of Kniss, Coronel and Gibbs	4.0
20 0112	Cherne	Telephone conference with E. Grover regarding reply; email from A. Barnes regarding his review of depositions	0.4
20 0112	Cherne	Review and revise reply regarding certification; finalize draft 10 and email regarding same; additional changes and analysis regarding same	3.3
20 0113	Cherne	Telephone conference with E. Grover regarding reply and possible mediation; email regarding possible mediation; review email regarding possible mediation	0.5
20 0119	Cherne	Telephone conference with E. Grover regarding damages and possible mediation and previous mediation and defendant's new gambit	0.6
20 0123	Cherne	Telephone conference with E. Grover regarding his conversation with opposing counsel regarding possible mediation	0.2
20 0213	Cherne	Emails regarding changed certification motion date; telephone conference with E. Grover regarding same	0.2
20 0213	Cherne	Emails regarding and review Frlekin v. Apple	0.2
20 0220	Cherne	Emails regarding and review second complaint	0.4

20 0224	Cherne	Telephone conference with E. Grover regarding oral argument Wednesday; planning regarding same	0.2
20 0227	Cherne	Telephone conference with E. Grover; review previous notes regarding talking points; email regarding same; telephone conference with E. Grover regarding hearing	0.6
20 0324	Cherne	Emails regarding transcript; review transcript and excerpt same; email to E. Grover regarding same	1.4
20 0401	Cherne	Emails regarding motion for summary judgment and conference call	0.2
20 0402	Cherne	Email regarding conference call and prepare for same	0.2
20 0404	Cherne	Emails and Dropbox regarding motion for summary judgment document review	0.4
20 0405	Cherne	Review materials to prepare for 4/6 conference call; emails regarding same	1.7
20 0406	Cherne	Review motion for summary judgment to prepare for conference call regarding opposition; attend conference call regarding opposition; additional review of motion for summary judgment	2.3
20 0407	Cherne	Telephone conference with E. Grover regarding motion for summary judgment and Frlekin v. Apple; email regarding same	0.3
20 0411	Cherne	Emails regarding opposition to motion for summary judgment	0.2
20 0412	Cherne	Emails regarding and compare drafts of opposition to motion for summary judgment	0.2
20 0413	Cherne	Emails from R. Spencer and with E. Grover regarding opposition to motion for summary judgment	0.2
20 0413	Cherne	Review and revise opposition to motion for summary judgment	4.3
20 0414	Cherne	Review E. Grover draft 4 of opposition to motion for summary judgment and redline of draft 3 versus draft 4	0.3
20 0417	Cherne	Review earlier email from R. Spencer	0.1
20 0421	Cherne	Review and check outline and separate statement; emails regarding draft opposition to motion for summary judgment; telephone conference with E. Grover regarding same	0.4
20 0422	Cherne	Telephone conference with E. Grover and emails; redline draft 2 versus draft 3 and review R. Spencer draft 3 of opposition	0.5
20 0422	Cherne	Review and revise R. Spencer draft 3 of opposition to produce SDB draft 4; email regarding same	5.4
20 0423	Cherne	Email regarding opposition; telephone conference with E. Grover regarding drafts and page limits	0.2

20 0426	Cherne	Review A. Barnes draft 5 of opposition to motion for summary judgment; lengthy email regarding page-limit issue, shortening the brief and a possible alternative approach to footnotes; additional emails regarding same	1.6
20 0426	Cherne	Email regarding and review E. Grover draft 6	0.5
20 0427	Cherne	Review, highlight and analyze Andrade v. Rehrig Pac. Co.	1.2
20 0427	Cherne	Extensive review and revision of opposition to motion for summary judgment (including research, emails, telephone conferences with E. Grover and review of Westlaw analytics)	7.3
20 0428	Cherne	Emails; telephone conference with E. Grover regarding declarations and conclusion	0.2
20 0428	Cherne	Email from SAB regarding Westlaw report	0.2
20 0428	Cherne	Review report; emails regarding same	0.3
20 0428	Cherne	Review and revise plaintiff's declaration; emails regarding same	0.4
20 0428	Cherne	Telephone conference with E. Grover and review, revise and finalize declaration and emails regarding same; additional telephone conferences and check and compare final	1.4
20 0428	Cherne	Additional telephone conference with E. Grover regarding citing Frlekin	0.1
20 0428	Cherne	Review draft 8 footnotes regarding in-on-employee-time; emails regarding correction to same	0.3
20 0428	Cherne	Review final signed declaration	0.1
20 0428	Cherne	Research regarding Troester, Frlekin and Rodriguez v. Nike; email regarding same	1.5
20 0429	Cherne	Emails regarding opposition and my concluding paragraph	0.4
20 0501	Cherne	Emails with E. Grover regarding final version; review draft 7 versus final and email regarding same	0.8
20 0520	Cherne	Telephone conference with E. Grover regarding possible motion to continue hearing on motion for summary judgment to await Brand decision	0.1
20 0521	Cherne	Review order granting motion to move hearing on motion for summary judgment until after decision in Brand	0.2
20 0614	Cherne	Review documents regarding MSJ; review prior email regarding Frlekin and emails regarding same	0.4
20 0706	Cherne	Emails regarding status of motion	0.2
20 0728	Cherne	Emails regarding briefing	0.2
20 0804	Cherne	Telephone conference with E. Grover regarding briefing schedule	0.1
20 0806	Cherne	Telephone conference with E. Grover regarding certification argument	0.2
20 0827	Cherne	Telephone conference with E. Grover	0.0
20 0907	Cherne	Email regarding "glue" quote pertaining to	0.1

		certification	
20 1121	Cherne	Emails regarding and quick review of certification order	0.2
20 1122	Cherne	Review ruling; telephone conference with E. Grover regarding same and regarding possible approaches	0.4
20 1123	Cherne	Emails regarding plaintiff; emails regarding appeals of denials of class certification	0.2
20 1123	Cherne	Conference call with E. Grover and R. Spencer regarding third amended complaint; review and revise third amended complaint and email regarding same	1.4
20 1123	Cherne	Email regarding appeal at end of case versus interlocutory appeal	0.2
20 1125	Cherne	Email from R. Spencer regarding his research regarding interlocutory appeals regarding class certification	0.1
20 1125	Cherne	Review and revise draft class notice; emails regarding same	0.8
20 1207	Cherne	Review answer to third amended complaint and emails regarding same and regarding third amended complaint	0.4
20 1208	Cherne	Emails regarding possible mediation	0.2
20 1209	Cherne	Review final filed third amended complaint and redline versus draft 2	0.2
20 1213	Cherne	Emails regarding mediation date	0.2
20 1214	Cherne	Telephone conference with E. Grover regarding mediation; email regarding same	0.2
20 1214	Cherne	Review and revise mediation email to opposing counsel	0.3
20 1214	Cherne	Emails to mediator's office regarding mediation	0.2
20 1221	Cherne	Email regarding mediation information request; review same; email regarding mediation	0.3
20 1221	Cherne	Review and revise mediation information request; review ruling and previous versions; email regarding same	1.1
20 1222	Cherne	Telephone conference with E. Grover regarding mediation information request and information needed	0.2
21 0000	Cherne	2021	
21 0115	Cherne	Review scheduling order; emails regarding same	0.2
21 0209	Cherne	Emails regarding mediation and mediation briefs	0.2
21 0210	Cherne	Telephone conference with E. Grover regarding mediation and mediation dates	0.1
21 0212	Cherne	Emails regarding and review E. Acevedo's research and my preliminary thoughts regarding settlements for proposed settlement classes as to which court previously denied certification	1.4

21 0216	Cherne	Emails regarding mediation; review and revise mediation brief, including drafting interim and final conclusions	3.8
21 0217	Cherne	Emails regarding mediation brief and hours; emails regarding conference room location	0.3
21 0218	Cherne	Email regarding mediation brief; review same	0.2
21 0219	Cherne	Emails regarding Section 226 damages	0.2
21 0220	Cherne	Prepare for mediation; emails with E. Grover and review attachment from J. Winikow	2.9
21 0221	Cherne	Prepare for mediation	1.9
21 0221	Cherne	Emails regarding mediation brief	0.3
21 0222	Cherne	Attend mediation, including meeting with E. Grover regarding same post-mediation	10.8
21 0223	Cherne	Telephone conferences with E. Grover; review and revise draft of MOU; emails regarding same	2.2
21 0223	Cherne	Review and redline E. Grover draft 3 of MOU and email regarding same	0.3
21 0306	Cherne	Email regarding MOU	0.1
21 0307	Cherne	Review and check final signed MOU against draft-2-versus-draft-3 redline of MOU; sign same and emails regarding same	1.6
21 0324	Cherne	Review Clayborne v. Chevron third-amended-complaint paragraphs including this defendant	0.2
21 0429	Cherne	Telephone conference with E. Grover regarding settlement stipulation review; email regarding same	0.2
21 0501	Cherne	Review and revise settlement stipulation; email regarding same	5.1
21 0503	Cherne	Telephone conference with E. Grover regarding motion for preliminary approval and settlement stipulation	0.2
21 0508	Cherne	Work on preliminary approval/fee petition	1.2
21 0514	Cherne	Review settlement stipulation and all exhibits and review redline versus S. Bernstein draft 2; sign and email stipulation; email regarding follow-ups	2.5
21 0606	Cherne	Telephone conference with E. Grover and emails regarding declaration	0.3
21 0606	Cherne	Research for, draft and email regarding declaration	0.6
21 0607	Cherne	Review, revise and finalize declaration and exhibits regarding motion for preliminary approval	0.5
21 0722	Cherne	Compilation for motion for preliminary approval	1.6
21 0729	Cherne	Telephone conference with E. Grover regarding motion for preliminary approval granted	0.2
21 0816	Cherne	Email from and telephone conference with E. Grover regarding fee petition	0.2
21 0818	Cherne	Work on fee petition	1.9
21 0820	Cherne	Compilation of information for fee petition	2.8

21 0824	Cherne	Review and revise exhibit to fee petition	2.4
21 0825	Cherne	Emails with E. Grover regarding fee petition; review and revise exhibit to fee petition	2.2
21 0826	Cherne	Draft, review and revise declaration regarding fees and costs; emails and telephone conference with E. Grover regarding same	1.9

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Date	Client/Case	Activity	Hours	Fees/Costs
17 0000		2017		
21 0827	Cherne	Time Computation Through August 26, 2021		
21 0827	Cherne - Total	Total Hours Through August 26, 2021	242.1	
21 0827	Cherne - Total	Total Future Hours Anticipated Through Hearing on Motion for Order Approving Settlement		N.A.
21 0827	Cherne - Total	Total Future Hours Anticipated After Hearing on Motion for Order Approving Settlement		N.A.
21 0827	Cherne - Total	Total Hours, This Interim Statement	242.1	
21 0827	FEES	Fee Computation, This Interim Statement		
21 0827	TOTAL FEES	242.1 hours @ \$900.00/hour		\$217,890.00
21 0827	COSTS	Cost Computation, This Interim Statement		
21 0827	Costs	Mediators		\$5,397.33
21 0827	Costs	Experts/Consultants		\$0.00
21 0827	Costs	Filing Fees		\$0.00
21 0827	Costs	Copying/Faxes		\$0.00
21 0827	Costs	Court Reporters		\$0.00
21 0827	Costs	Process Servers		\$0.00
21 0827	Costs	Mediation Conference Room		\$159.38
21 0827	Costs	Meals and Lodging		\$0.00
21 0827	Costs	Ground Transportation		\$0.00
21 0827	Costs	Mileage		\$121.05
21 0827	Costs	Parking and Bridge Tolls		\$55.00
21 0827	Costs	Postage and Delivery		\$0.00
21 0827	Costs	Telephone		\$0.00
21 0827	Costs	Subpoenaed Document Copy Charge		\$0.00
21 0827	Costs	Expense Reimbursement to Keller Grover LLP		\$11,500.00
21 0827	TOTAL COSTS	Total Costs Through August 26, 2021		\$17,232.76
21 0827	TOTAL FEES AND COSTS	Total Fees and Costs Through August 26, 2021		\$235,122.76