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8 *Settlement Class*

Electronically
FILED
by Superior Court of California, County of San Mateo
ON 4/10/2023
By /s/ Vanessa Jimenez
Deputy Clerk

9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF SAN MATEO**

12
13 ALABAMA DOE 1, ALABAMA DOE 2,
14 INDIANA DOE, MISSOURI DOE, AND
15 FLORIDA DOE, Individually and on Behalf of
16 All Others Similarly Situated,

17 Plaintiffs,

18 vs.

19 GILEAD SCIENCES, INC.,

20 Defendant.

Case No.: 20-CIV-03699

**DECLARATION OF RONDA B.
GOLDFEIN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
CLASS REPRESENTATIVE SERVICE
AWARDS**

Dept: 3
Judge: Hon. Susan L. Greenberg
Date: June 29, 2023
Time: 9:00 a.m.

CLASS ACTION

Action Filed: September 1, 2020
Trial Date: None Set

1 I, Ronda B. Goldfein, hereby declare as follows:

2 1. I am one of the attorneys for Plaintiffs and the Settlement Class in the above-captioned
3 matter. I am admitted in this Court *pro hac vice* with respect to this matter.

4 2. I submit this Declaration in support of Plaintiffs' Motion for Attorneys' Fees, Costs, and
5 Class Representative Service Awards. The following is based on my personal knowledge and
6 investigation, and if called upon to do so, I could and would competently testify thereto.

7 **I. CO-LEAD CLASS COUNSEL'S EXPERIENCE**

8 3. Founded in 1988, the AIDS Law Project was established when the fear of AIDS was at
9 its height. Routine and widespread discrimination flourished in every major aspect of life, including
10 healthcare, housing and education. Thirty-five later, the AIDS Law Project remains the nation's only
11 independent nonprofit public-interest law firm that provides free legal services exclusively to people
12 living with HIV and those affected by the epidemic

13 4. I am a nationally recognized advocate for people living with HIV. In December 2010, I
14 was listed among the top 100 HIV/AIDS activists in the United States by POZ magazine. In 2007, I was
15 named "Policymaker of the Year" by the Penn Center for AIDS Research, a joint project of the
16 University of Pennsylvania, the Children's Hospital of Philadelphia, and the Wistar Institute.

17 5. The AIDS Law Project provides free legal services to people living with HIV throughout
18 Pennsylvania and Southern New Jersey. We have a holistic approach to providing legal services. We
19 provide representation in those areas that are HIV-specific, such as discrimination and privacy. We help
20 people obtain health care through private or public health insurance. We assist people who are unable to
21 work obtain private or public disability benefits. We represent people facing eviction, utility terminations
22 or mortgage foreclosures. We provide immigration assistance. We also draft Wills, Living Wills and
23 Medical and Financial Powers of Attorney for our clients.

24 6. We are part of a continuum of care for people living with HIV in Pennsylvania and
25 southern New Jersey. We have three medical legal-partnerships. One is located at Philadelphia's largest
26 primary care provider for people living with HIV; the second is based at an infectious disease clinic in
27 Southern New Jersey; and the third is at Philadelphia's only legal syringe exchange. We are also part of
28 a health education program for people living with HIV that is taught in English and Spanish.

1 7. Our legal services are available to the working poor because we do not impose means
2 testing that often disqualifies this population. We make home and hospital visits to clients who are too
3 ill to travel to our offices, and we utilize bilingual staff and translation services to assist our clients in
4 their preferred language.

5 8. Complementing our direct legal representation are our public education services and
6 legislative advocacy. The AIDS Law Project educates the public on AIDS-related legal issues through
7 three monthly seminars, trains case management professionals in a biannual two-day public benefits
8 training, and works at local, state and national levels to achieve fair HIV laws and policies.

9 9. In our 35-year history, the AIDS Law Project has risen to the defense of approximately
10 47,000 people living with HIV, and educated more than 45,000 others on HIV-related legal issues so
11 that they could advocate for themselves and their communities.

12 10. The AIDS Law Project has been honored with several awards as a testament to our
13 dedication and commitment to people living with HIV. In 2014, the AIDS Law Project received the
14 Alexander D. Forger Award for Excellence in HIV Legal Services and Advocacy for our “record of
15 commitment and effectiveness in the fight against HIV and AIDS.” In 2012, we were awarded the
16 Kiyoshi Kuromiya Award for Justice “for more than 20 years of fighting fearlessly for the legal rights
17 of those living with HIV, educating thousands about AIDS-related issues, and working on multiple levels
18 of government to achieve fair laws and policies for those living with and affected by the virus.” In 2007,
19 Philadelphia Black Gay Pride recognized us for our “unapologetic commitment to Philadelphia’s Black
20 LGBT communities.” In 2006, we received the Bridge Award for our “unconditional work and
21 dedication to unite and strengthen Philadelphia’s diverse LGBT community.” In 2005, we received the
22 Barristers’ Association of Philadelphia annual Cecil B. Moore award for “continued and selfless service
23 to the Philadelphia community.” That same year, we received the Philadelphia AIDS Consortium Annual
24 Providers’ Choice Award. In 1994, we were awarded Dignity Philadelphia’s annual Community Service
25 Award for our “outstanding service to the Lesbian/Gay/Bisexual community.”

26 11. The AIDS Law Project has worked to defend the rights of people living with HIV since
27 early in the epidemic’s history. For example, in 1994, the AIDS Law Project sued a Philadelphia health
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1 club after a member was ejected because of fears of HIV transmission.¹ The settlement in this case was
2 not just a validation for the client and his family – although the plaintiff did not live long enough to see
3 the resolution – but sent a clear message to the community that people with HIV need not be feared and
4 present no risk of transmission in casual settings.

5 12. The AIDS Law Project works to ensure that clients understand that their medical
6 information is private and may not be shared without permission, except in certain limited
7 circumstances. In our 35-year history, the AIDS Law Project has responded to over 1,500 complaints of
8 HIV-specific medical privacy on behalf of clients who could not find a private lawyer willing to take
9 their case.

10 13. We have represented numerous individuals living with or affected by HIV in
11 confidentiality cases. *See, e.g., MS v. Dr. & Philadelphia Hospital* (Feb. 2021) (reached settlement
12 where treating physician disclosed client’s HIV status to visitors in hospital room); *Doe v. Sunray Drugs*,
13 No. 191103276 (Pa. Commw. Ct. Feb. 19, 2020) (Pharmacy settled for an undisclosed amount after
14 woman’s HIV medications were delivered and left visible within her apartment complex, leading to
15 social ostracizing and loss of community); *F.T. v. Phila. Nurse Family Partnership*, 181002105 (Pa.
16 Commw. Ct. Jan. 30, 2019) (Home health care agency settled for an undisclosed amount after a nurse
17 inadvertently disclosed a young mother’s HIV status to family members, resulting in loss of support and
18 community); *EEOC and MB v. Shoe Store*. (Aug. 2016) (reached settlement for employer disclosure of
19 HIV status to a co-worker without consent, in violation of the Americans with Disabilities Act); *DD v.*
20 *Home Health Care Provider* (Apr. 2015) (reached settlement on behalf of client whose HIV status was
21 disclosed to a family member by a home health worker); *TH v. Doctor & Hospital* (July 2014) (reached
22 settlement where treating physician disclosed client’s HIV status to visitor in hospital room); *JS v.*
23 *Hospital* (Sept. 2014) (reached settlement for patient whose HIV status was disclosed to a visitor in
24 hospital room by treating physician); *MM, et al. v. Residential Treatment Center* (Dec. 2011) (reached
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26 ¹ See Joseph A. Slobodzian, *Lawsuit Accuses Gym of AIDS Bias: A City Center Man Says the Owner*
27 *Embarrassed Then Ejected Him After Learning He Had AIDS*, PHIL. INQUIRER, Aug. 18, 1994, at
28 B01 (“The plaintiff’s lawyers called the suit the first against a fitness center under the two-year-old
Americans With Disabilities Act, the federal law that requires facilities that serve the public to
accommodate people with disabilities, including AIDS or HIV, the AIDS virus”).

1 settlement on behalf of residents of a drug treatment center after dietician was careless with a list of
2 patients living with HIV); *see also Doe v. Southeastern Pennsylvania Transp. Auth.*, 886 F. Supp. 1186
3 (E.D. Pa. 1994) (trial court found that employer’s administrative officer’s review and disclosure of
4 information on utilization of employer’s prescription benefit plan indicating that employee was being
5 treated for HIV-related illness, violating employee’s right to privacy), 72 F.3d 1133 (3d Cir. 1995)
6 (setting aside verdict, but holding that individuals have a constitutionally protected right to privacy in
7 their medical records, including prescription drug records, and in their HIV status).

8 14. The AIDS Law Project has represented numerous clients in HIV discrimination cases,
9 *See, e.g., WR v. Pennsylvania Medical Center*, (PHRC 201801702) (settlement reached on behalf of
10 woman alleging discriminatory refusal of outpatient procedure); *Jones v. OSS Orthopaedic Hospital*
11 *LLC*, No. 1:16-cv-01258-YK (M.D. Pa. 2016) (settlement on behalf of client alleging discriminatory
12 denial of access to aquatic therapy pool because of the plaintiff’s HIV status); *Jones v. Diamantoni &*
13 *Associates Family Practice*, No. 2:14-cv-6796-GP (E.D. Pa. 2015) (settlement reached on behalf of
14 client and his family after being allegedly dismissed from a medical practice based on the client’s HIV
15 status); *Smith v. Milton Hershey School*, No. 11–7391, 2012 WL 1966125 (E.D. Pa. 2012) (settlement
16 for \$715,000 on behalf of 13-year-old student who alleged the Milton Hershey School refused to enroll
17 him because he is living with HIV; Department of Justice entered the lawsuit on behalf of the student);
18 *Canal Side Care Manor, LLC v. Pa. Human Relations Commission*, 30 A. 3d 568 (Commw. Ct. Pa.
19 2011) (affirming a finding of discrimination against a personal care home that evicted a client because
20 she was HIV positive); *EEOC v. Capital Healthcare Solutions*, No. 2:11-cv-01249-NBF (W.D. Pa.)
21 (settlement on behalf of a Certified Nursing Assistant refused employment by a staffing service because
22 of his HIV status); *Smith v. City of Philadelphia*, 345 F. Supp. 2d 482 (E.D. Pa. 2004) (settlement on
23 behalf of client who alleged that city emergency medical technicians failed to provide appropriate care
24 because of his HIV).

25 15. Moreover, the AIDS Law Project serves as an expert in HIV confidentiality laws and
26 HIV privacy issues generally. We train approximately 500 people a year on HIV confidentiality at
27 lectures convened by the Philadelphia Department of Health, the federal AIDS Education and Training
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1 Center Program, and the Drexel University College of Medicine. We have also lectured at national and
2 local CLEs, the International AIDS Conference, and webinars for private industry.

3 16. A copy of the AIDS Law Project CV is attached hereto as **Exhibit A**.

4 17. I have worked extensively with John Grogan of Langer, Grogan & Diver, P.C. (“Langer
5 Grogan”), a law firm specializing in complex civil litigation including class action litigation in the areas
6 of consumer protection, antitrust, constitutional law and civil rights. Mr. Grogan has served as counsel
7 to the AIDS Law Project of Philadelphia since 2019. A copy of Mr. Grogan’s CV is attached hereto as
8 **Exhibit B**.

9 18. Langer Grogan has enjoyed success in litigating class actions on behalf of consumers,
10 small businesses, non-profit organizations and concerned citizens in areas including antitrust, consumer
11 and civil rights law.

12 19. Langer Grogan has been responsible for significant class action victories, usually via
13 favorable settlements, in the areas of consumer law and antitrust law. *See, e.g., Faloney v. Wachovia*
14 *Bank, N.A.*, 254 F.R.D. 204 (2008) (lead counsel in RICO action against major bank for facilitation of
15 consumer fraud); *Reyes v. Zions First National Bank*, No. 10-cv-345, 2013 WL 5332107, (E.D. Pa. Sept.
16 23, 2013); *Reyes v Netdeposit*, 802 F.3d 469 (3d Cir. 2015) (lead counsel in consumer class action against
17 mass marketing fraud); *Commonwealth of Pennsylvania v. Think Finance Inc.*, No. 2:15-cv-00092 (E.D.
18 Pa. 2020) (acting as special counsel to the Commonwealth, firm led a successful consumer action against
19 finance company and a private equity firm engaged in a scheme to evade state usury laws); *In re*
20 *Linerboard Antitrust Litig.*, 305 F.3d 145 (3d Cir. 2002) (obtaining what was, at the time, the largest
21 antitrust recovery in the Third Circuit); and *Laumann v. NHL*, 56 F. Supp. 3d 280 (S.D.N.Y. 2014)
22 (settlement in antitrust case against the National Hockey League and Major League Baseball resulted in
23 those leagues, for the first time, unbundling their internet sports offerings).

24 20. In addition, Langer Grogan has an extensive practice in civil rights and related public law
25 matters. *See, e.g., Buck v. Stankovic*, 485 F. Supp. 2d 576 (M.D. Pa. 2007) (working with the ACLU of
26 Pennsylvania, the firm successfully enjoined a Pennsylvania county from refusing to issue a marriage
27 license to an American citizen and her undocumented immigrant fiancée.); *Fields v. City of Philadelphia*,
28 862 F.3d 353 (3d Cir. 2017) (case with the ACLU establishing that citizens have a First Amendment

1 right to observe and record police activity); *ACLU v United States Immigration and Customs*
 2 *Enforcement*, No. 20-cv-2363 (E.D. Pa.) (counsel with the ACLU of Pennsylvania and Villanova Law
 3 School’s Farmworker Legal Aid Clinic in FOIA action); and *Castillo Chaidez v. Hemphill*, No. 2:18-cv-
 4 01837 (E.D. Pa. 2021) (case involving allegations of abusive labor practices). More information about
 5 my firm and its work can be found at <https://langergrogan.com>.

6 **II. LODESTAR AND EXPENSES OF THE AIDS LAW PROJECT AND LANGER**
 7 **GROGAN**

8 21. In total, the AIDS Law Project and Langer Grogan spent 856.55 hours on this matter,
 9 representing a lodestar of \$475,624.00.

10 22. The following chart identifies the attorneys and professional support staff of the AIDS
 11 Law Project and Langer Grogan who worked on this matter, their positions, hours worked, hourly rate,
 12 and corresponding lodestar that has been billed:

<u>The AIDS Law Project</u>				
Name	Position	Hourly Rate	Hours Worked	Lodestar
Adrian M. Lowe	Associate	\$305	319.25	\$97,371.25
Juan Miguel Baez	Associate	\$127.50	1.0	\$127.50
Kat Contreras	Paralegal	\$145	17.25	\$2,501.25
Ronda B. Goldfein	Partner	\$635	191.25	\$121,444.00
Yolanda French Lollis	Partner	\$635	72.75	\$46,196.25
		Total	601.5	\$267,640.25

<u>Langer Grogan</u>				
Name	Position	Hourly Rate	Hours Worked	Lodestar
David Nagdeman	Associate	\$500	100.60	\$50,300.00
John J. Grogan	Partner	\$1,200	110.20	\$132,240.00
Kevin Trainer	Associate	\$575	44.25	\$25,443.75
		Total	255.05	\$207,983.75

23. The AIDS Law Project’s and Langer Grogan’s billing entries, modified to protect the
 24 identities of clients and class members and attorney client privilege, are attached hereto as **Exhibits C**
 25 **and D**. However, to assist the Court in evaluating the reasonableness of the hours billed by Class
 26 Counsel, the following tables summarize the work performed by attorneys and professional support staff
 27
 28

of Class Counsel to correlate that time to the major tasks of the litigation:

Case Assessment, Development, and Administration

Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	2	\$1,270.00
Adrian M. Lowe	\$305	7	\$2,135.00
John J. Grogan	\$1,200	2.3	\$2,760.00
TOTALS:		11.3	\$6,165.00

Fact Investigation and Development

Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	3.75	\$2,381.25
Yolanda French Lollis	\$635	4.5	\$2,857.50
Adrian M. Lowe	\$305	29.5	\$8,997.50
Kat Contrera	\$145	17.25	\$2,501.25
David Nagdeman	\$500	2.5	\$1,250.00
TOTALS:		57.5	\$17,987.50

Analysis and Strategy

Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	30.5	\$19,367.50
Yolanda French Lollis	\$635	15.0	\$9,525.00
Adrian M. Lowe	\$305	21.25	\$6,481.25
John J. Grogan	\$1,200	5.0	\$6,000.00
David Nagdeman	\$500	3.0	\$1,500.00
Kevin Trainer	\$575	8.75	\$5,031.25
TOTALS:		83.5	\$47,905.00

Document File Management

Name	Rate	Hours	Lodestar
Adrian M. Lowe	\$305	20.75	\$6,328.75
TOTALS:		20.75	\$6,328.75

Miscellaneous Filings (e.g., pro hac vice)

Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	2.5	\$1,587.50
Yolanda French Lollis	\$635	1.25	\$793.75
Adrian M. Lowe	\$305	4.5	\$1,372.50
John J. Grogan	\$1,200	1.5	\$1,800.00
David Nagdeman	\$500	1.8	\$900.00
TOTALS:		11.55	\$6,453.75

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<u>Pleading</u>			
Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	9.5	\$6,032.50
Yolanda French Lollis	\$635	7.75	\$4,921.25
Adrian M. Lowe	\$305	16.5	\$5,032.50
John J. Grogan	\$1,200	3.4	\$4,080.00
David Nagdeman	\$500	6.0	\$3,000.00
Kevin Trainer	\$575	22.0	\$12,650.00
TOTALS:		64.9	\$35,716.25

<u>Court Mandated Conferences</u>			
Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	2.75	\$596.75
Adrian M. Lowe	\$305	2.75	\$838.75
David Nagdeman	\$500	0.9	\$450.00
Kevin Trainer	\$575	0.75	\$431.25
TOTALS:		7.15	\$2,316.75

<u>Dispositive Motions</u>			
Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	13.5	\$8,572.50
Yolanda French Lollis	\$635	2.5	\$1,587.50
Adrian M. Lowe	\$305	21.25	\$6,481.25
John J. Grogan	\$1,200	36.80	\$44,160.00
David Nagdeman	\$500	56.60	\$28,300.00
TOTALS:		130.65	\$89,101.25

<u>Discovery (General)</u>			
Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	12.25	\$7,778.75
Yolanda French Lollis	\$635	2	\$1,270.00
Adrian M. Lowe	\$305	3.75	\$1,143.75
John J. Grogan	\$1,200	1.4	\$1,680.00
David Nagdeman	\$500	1.0	\$500.00
Kevin Trainer	\$575	.5	\$287.50
TOTALS:		20.9	\$12,660.00

Written Discovery

Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	4.75	\$3,016.25
Yolanda French Lollis	\$635	11.75	\$7,461.25
Adrian M. Lowe	\$305	49.0	\$14,945.00
David Nagdeman	\$500	6.2	\$3,100.00
TOTALS:		71.7	\$28,522.50

Document Production

Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	22.0	\$13,970.00
Adrian M. Lowe	\$305	13.75	\$4,193.75
John J. Grogan	\$1,200	5.6	\$6,720.00
David Nagdeman	\$500	3.5	\$1,750.00
TOTALS:		34.85	\$36,633.75

Depositions

Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	1.25	\$793.75
Adrian M. Lowe	\$305	50.5	\$15,402.50
John J. Grogan	\$1,200	27.60	\$33,120.00
Kevin Trainer	\$575	6.75	\$3,881.25
TOTALS:		86.10	\$53,197.50

Expert Discovery

Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	3.75	\$2,381.25
TOTALS:		3.75	\$2,381.25

Discovery Motions

Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	14.25	\$9,048.75
Yolanda French Lollis	\$635	4.5	\$2,857.50
Adrian M. Lowe	\$305	12.0	\$3,660.00
John J. Grogan	\$1,200	9.4	\$11,280.00
Kevin Trainer	\$575	1.5	\$862.50
TOTALS:		41.65	\$27,708.75

Appeal

Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	3.75	\$2,381.25
Yolanda French Lollis	\$635	2.25	\$1,428.75
Adrian M. Lowe	\$305	1.5	\$457.50
David Nagdeman	\$500	3.4	\$1,700.00
TOTALS:		10.9	\$5,967.50

Initial ADR Discussions

Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	1.0	\$635.00
Yolanda French Lollis	\$635	0.75	\$476.25
Adrian M. Lowe	\$305	1.25	\$381.25
TOTALS:		2.0	\$1,492.50

Mediation

Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	24.25	\$15,398.75
Yolanda French Lollis	\$635	15.75	\$10,001.25
Adrian M. Lowe	\$305	20.0	\$6,100.00
John J. Grogan	\$1,200	13.90	\$16,680.00
David Nagdeman	\$500	15.5	\$7,750.00
TOTALS:		89.4	\$55,930.00

Renewed Settlement Negotiations and Preliminary Approval of Settlement

Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	20.25	\$12,858.75
Yolanda French Lollis	\$635	3.75	\$2,381.25
Adrian M. Lowe	\$305	9.5	\$2,897.50
John J. Grogan	\$1,200	3.3	\$3,960.00
Kevin Trainer	\$575	4.0	\$2,300.00
TOTALS:		40.8	\$24,397.50

Supplemental Filing ISO Preliminary Approval of Settlement

Name	Rate	Hours	Lodestar
Yolanda French Lollis	\$635	0.5	\$317.50
Adrian M. Lowe	\$305	16.0	\$4,880.00
TOTALS:		16.5	\$5,197.50

Settlement Administration

Name	Rate	Hours	Lodestar
Ronda B. Goldfein	\$635	12.75	\$8,096.25
Yolanda French Lollis	\$635	0.5	\$317.50
Adrian M. Lowe	\$305	18.5	\$5,642.50
TOTALS:		31.75	\$14,056.25

24. The hourly rates for the attorneys and professional support staff at the AIDS Law Project and Langer Grogan included above are the same as the regular rates that would be and have been charged for their services in non-contingent matters and/or which have been accepted in other class action/collective action litigation by state and federal courts and across the country and by neutral arbitrators. *See, e.g., Boyd v. TitleMax of Delaware, Inc.*, JAMS Arbitration Case, Ref. No. 5450000202 (March 20, 2023) (finding that the requested rates for Langer Grogan attorneys, including the rate requested by David A. Nagdeman, “reasonable given their reputations and experience”); *Commonwealth of PA v. Think Finance, Inc., et al.*, No. 14-cv-07139 (E.D. Pa. Dec. 30, 2019) (approving settlement and rates similar to those requested above in which Langer Grogan represented the State of Pennsylvania as special counsel); *Reyes v. Zions First Nat’l Bank, et al.*, No 10-00345 (E.D. Pa. July 8, 2016) (Order) (approving Langer Grogan’s requested fees at similar rates); *Garber v. Office of the Comm’r of Baseball*, No. 12-3704 (S.D.N.Y April 27, 2016) (Order) (same); *Laumann v. National Hockey League*, No. 12-1817 (S.D.N.Y. Sept. 1, 2015) (Order) (same); *Faloney v. Wachovia Bank, N.A.*, No 07-1455 (E.D. Pa. Jan. 22, 2009) (Order) (“Langer Grogan’s hourly fees on which the lodestar is calculated ... are well within those charged by comparable skilled attorneys.”).

25. John Grogan and I have reviewed the time that comprises the AIDS Law Project’s and Langer Grogan’s lodestar to ensure it is accurate and reflective of the work that was performed. All the work performed as set forth above was necessary and reasonably incurred on behalf of Plaintiffs and the Settlement Class.

26. I personally oversaw and supervised the work performed on behalf of Plaintiffs and the Settlement Class by attorneys and staff members at the AIDS Law Project to avoid duplication of effort and unnecessary expense and to accomplish tasks in an efficient manner, and I am informed that John

1 Grogan did the same on behalf of Langer Grogan.

2 27. To date, Co-Lead Class Counsel has received no compensation for their efforts to
3 investigate and prosecute this Litigation and have received no reimbursement for the significant
4 expenses they have incurred.

5 28. Co-Lead Class Counsel also requests reimbursement of its reasonable out-of-pocket
6 expenses incurred on behalf of Plaintiffs and the Settlement Class. These expenses consist
7 predominantly of mediation sessions and related mediator fees, court fees, expert fees, court reporting
8 costs, travel, and computer research.

9 29. Specifically, to date, the AIDS Law Project and Langer Grogan have expended \$4,717.14
10 in unreimbursed out-of-pocket expenses in connection with this matter, as summarized below:

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TYPE OF EXPENSE	AMOUNT
Travel	\$3,626.54
Court Reporting/Transcripts	\$1,048.10
Filing & Misc. Fees	\$42.50
CURRENT TOTAL EXPENSES	\$4,717.14

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15 30. These expenses were incurred on behalf of Plaintiffs and the Settlement Class on a fully
16 contingent basis and have not been reimbursed. These expenses incurred are reflected on the books and
17 records of the AIDS Law Project and Langer Grogan. These books and records are prepared from
18 receipts, invoices, expense vouchers, check records, and other source materials, and represent an
19 accurate recordation of the expenses incurred. John Grogan and I have reviewed the expenses and believe
20 they are reasonable and were necessary to prosecute this case.

21 31. In addition to the above expenses, it is anticipated that Co-Lead Class Counsel will incur
22 additional expenses in connection with the Litigation, including in preparing for and appearing at the
23 Final Approval Hearing, as well as additional expenses incurred in administering and monitoring the
24 Settlement and assisting Settlement Class Members. Class Counsel will be prepared to address any
25 additional expenses at the Final Approval Hearing.
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1 The foregoing statement is made under penalty of perjury and is true and correct to the best of
2 my knowledge and belief.

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4 Date: April 10, 2023

/s/ Ronda B. Goldfein
Ronda B. Goldfein

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Exhibit A

AIDS Law Project *of Pennsylvania*

a nonprofit, public-interest law firm

The AIDS Law Project of Pennsylvania is a nonprofit public-interest law firm providing free legal services to people living with HIV or at high risk of acquiring it. Founded in 1988, the AIDS Law Project was established when the fear of AIDS was at its height. Routine and widespread discrimination flourished in every major aspect of life, including healthcare, housing and education.

We serve all of Pennsylvania and Southern New Jersey from our offices in Philadelphia and Camden County, NJ. We make home and hospital visits to clients who are too ill to travel to our offices and utilize bilingual staff and translation services to assist our clients in their preferred language.

Complementing our direct legal representation are our public education services and legislative advocacy. The AIDS Law Project educates the public on HIV-related legal issues through three monthly seminars, trains case management professionals in a biannual two-day public benefits training. We work at local, state, and national levels to achieve fair HIV laws and policies.

We have a holistic approach to providing legal services. We provide representation in those areas that are HIV-specific, such as discrimination and privacy. We help people obtain health care through private or public health insurance. We assist people who are unable to work obtain private or public disability benefits. We represent people facing eviction, utility terminations or mortgage foreclosures. We provide immigration assistance. We also draft Wills, Living Wills and Medical and Financial Powers of Attorney for our clients.

In our 34-year history, the AIDS Law Project has risen to the defense of approximately 46,000 Pennsylvanians and New Jerseyans living with HIV and educated more than 45,000 others on HIV-related legal issues so that they could advocate for themselves and their communities.

The AIDS Law Project has been honored with several awards as a testament to our dedication and commitment to people living with HIV. In 2014, the AIDS Law Project received the Alexander D. Forger Award for Excellence in HIV Legal Services and Advocacy for our “record of commitment and effectiveness in the fight against HIV and AIDS.” In 2012, we were awarded the Kiyoshi Kuromiya Award for Justice “for more than 20 years of fighting fearlessly for the legal rights of those living with HIV, educating thousands about AIDS-related issues, and working on multiple levels of government to achieve fair laws and policies for those living with and affected by the virus.” In 2007, Philadelphia Black Gay Pride recognized us for our “unapologetic commitment to Philadelphia’s Black LGBT communities.” In 2006, we received the Bridge Award for our “unconditional work and dedication to unite and strengthen Philadelphia’s diverse LGBT community.” In 2005, we received the Barristers’ Association of Philadelphia annual Cecil B. Moore award for “continued and selfless service to the Philadelphia community.” That same year, we received the Philadelphia AIDS Consortium Annual Providers’ Choice Award. In 1994, we were awarded Dignity Philadelphia’s annual Community Service Award for our “outstanding service to the Lesbian/Gay/Bisexual community.”

The AIDS Law Project works to ensure that people living with HIV understand that their medical information is private and may not be shared without permission, except in certain limited circumstances. We have represented numerous individuals living with or affected by HIV in confidentiality cases. *See, e.g., Beckett v. Aetna* (2018) (reached \$17 million settlement in class action lawsuit against Aetna for exposing their insureds' confidential HIV-related information); *EEOC and MB v. Shoe Store* (Aug. 2016) (reached settlement for employer's disclosure of HIV status to a co-worker without consent, in violation of the Americans with Disabilities Act); *DD v. Home Healthcare Provider* (Apr. 2015) (reached settlement on behalf of client whose HIV status was disclosed to a family member by a home health worker); *JS v. Hospital* (Sept. 2014) (reached settlement where treating physician disclosed HIV status to visitor in hospital room); *TH v. Doctor & Hospital* (July 2014) (reached settlement where treating physician disclosed client's HIV status to visitor in hospital room); *MM, et al. v. Residential Treatment Center* (Dec. 2011) (reached settlement on behalf of residents of a drug treatment center where dietician was careless with a list of patients with HIV); *Doe v. Southeastern Pennsylvania Transp. Auth.*, (1994) (alleging that employer's administrative officer reviewed and disclosed information on utilization of employer's prescription benefit plan that indicated that employee was being treated for HIV-related illness, violating client's rights to privacy).

The AIDS Law Project has represented numerous clients in HIV discrimination cases. *See, e.g. Jones v. OSS Orthopaedic Hospital LLC*, (2016) (representing women alleging discriminatory denial of access to aquatic therapy pool because of her HIV status); *Jones v. Diamantoni & Associates Family Practice*, (2015) (settlement reached on behalf of client and his family after they were allegedly dismissed from a medical practice based on the client's HIV status); *Smith v. Milton Hershey School*, (2012) (alleging that the Milton Hershey School refused to enroll a 13-year-old student because he is living with HIV; case brought with Department of Justice settled for \$715,000); *Canal Side Care Manor, LLC v. Pa. Human Relations Commission*, (2011) (affirming a finding of discrimination against a personal care home that evicted a client because she had HIV); *EEOC v. Capital Healthcare Solutions, No.* (2011) (representing a Certified Nursing Assistant refused employment by a staffing service because of his HIV status); *Smith v. City of Philadelphia*, 345 F. Supp. 2d 482 (E.D. Pa. 2004) (alleging that city emergency medical technicians failed to provide appropriate care to man with HIV); *Silverman v. 12th Street Gym* (1994)(settled case on behalf of man ejected from gym, once his HIV status became known).

Moreover, the AIDS Law Project serves as an expert in HIV confidentiality laws and HIV privacy issues generally. We train approximately 500 people a year on HIV confidentiality at lectures convened by the Philadelphia Department of Health, the federal AIDS Education and Training Center Program, and the Drexel University College of Medicine. We have also lectured at national and local CLEs, the international AIDS conference, and webinars for private industry.

1211 Chestnut Street, Suite 600/Philadelphia, PA 19107/215-587-9377

www.aidslawpa.org

[\(215\) 587-9377](tel:2155879377)

[\(215\) 587-9902](tel:2155879902)

Exhibit B

JOHN J. GROGAN
LANGER GROGAN & DIVER, PC
1717 Arch Street, Suite 4130
(215) 320-5662 tel.
(215) 320-5703 fax.
jgrogan@langergrogan.com

PROFESSIONAL EXPERIENCE

LANGER GROGAN & DIVER, P.C.

Partner

2004-Present

Founding partner of a law practice that combines the representation of private clients in complex civil litigation in state and federal courts with a sustained program of public interest litigation. The firm concentrates its representation of private and class-based clients in the areas of antitrust, intellectual property, and consumer rights. The firm's public interest practice focuses on constitutional litigation.

UNIVERSITY OF PENNSYLVANIA LAW SCHOOL

Lecturer in Law

2012-Present

Designed and taught a summer course on the introduction to American law for foreign law students and non-lawyers. Recruited lecturers, conducted lectures in American legal systems and constitutional law, and oversaw all academic portions of the program.

SANDALS & LANGER, L.L.P.

Associate

2001-2003

Attorney in the practice of antitrust, appellate, class action, consumer, immigrant rights, and civil rights litigation.

CAMDEN CENTER FOR LAW AND SOCIAL JUSTICE, INC.

Co-Founder and Director

1994-2001

Co-Founder and director of a private, non-profit public interest law firm serving the civil law needs of the poor of Southern New Jersey. Practice areas include immigration law and immigrant's rights, labor and employment law, and civil rights.

RUTGERS UNIVERSITY SCHOOL OF LAW-CAMDEN

Adjunct Professor

1995-2000

Teacher of first-year courses in legal writing and research.

ECHOING GREEN PUBLIC SERVICE FELLOW

Fellow

1994-1996

Fellow of a national program to support public service and social-change entrepreneurs. Fellowship project was to establish the Camden Center for Law and Social Justice, Inc.

HONORABLE ALAN B. HANDLER, JUSTICE, SUPREME COURT OF NEW JERSEY
Law Clerk 1993-94 Term

EDUCATION

UNIVERSITY OF PENNSYLVANIA LAW SCHOOL 1993
Juris Doctor, *magna cum laude*, Order of the Coif
Kramer Public Interest Scholar 1991-1993

FORDHAM UNIVERSITY 1988
Bachelor of Arts, 1988 (History), *cum laude en cursu honorum*, Phi Beta Kappa

ACHIEVEMENTS

AMERICAN LAW INSTITUTE
Elected Member 2008

SALZBURG SEMINAR ON INTERNATIONAL HUMAN RIGHTS, SALZBURG AUSTRIA
Fellow 2001
Fellow representing the University of Pennsylvania Law School at an international gathering of public officials, lawyers and human rights advocates to discuss the advancement of international human rights.

SOUTHERN NEW JERSEY IMMIGRATION POLICY NETWORK
Co-Founder 2000
Co-founder of a coalition of over fifty community organizations to support and advocate on behalf of immigrants in the Southern New Jersey area.

CAMDEN IMMIGRANT ADVOCACY PROJECT
Co-Founder 1998
Co-founder of an initiative to train local lawyers in immigration law to enhance the local bar's awareness of immigrant welfare.

HIV LAW PROJECT OF SOUTHERN NEW JERSEY
Co-Founder 1996
Co-founder of the first legal services program for people with HIV and AIDS in Southern New Jersey.

AWARDS

PENNSYLVANIA SUPER LAWYER 2006-PRESENT

HEBREW IMMIGRANT AID SOCIETY, *Advocate Award* 2017

JEWISH SOCIAL POLICY ADVOCACY NETWORK, *Social Justice Award* 2011

HIAS & COUNCIL MIGRATION SERVICES OF PHILADELPHIA, <i>Pro Bono Award</i>	2007
COMMUNITY LEGAL SERVICE OF PHILADELPHIA, <i>Champion of Justice Award</i>	2006
UNIVERSITY OF PENNSYLVANIA LAW ALUMNI SOCIETY, <i>Young Alumnus Award</i>	2001
ROMAN CATHOLIC DIOCESE OF CAMDEN, <i>St. Thomas More Award for Public Service</i>	2000
NEW JERSEY STATE BAR ASSOCIATION, <i>Young Lawyer's Award</i>	1997

BOARD RESPONSIBILITIES:

AMERICAN CATHOLIC HISTORICAL SOCIETY	PRESENT
CAMDEN CENTER FOR LAW AND SOCIAL JUSTICE, CAMDEN, N.J.	PRESENT
CENTER ON IMMIGRATION, CABRINI COLLEGE	PRESENT
ORTHODOX CHRISTIAN STUDIES CENTER, FORDHAM UNIVERSITY.	PRESENT
SSJ WELCOME CENTER, CAMDEN, N.J.	PRESENT

PUBLICATIONS:

“The Eternal Scandal: Karl Rahner, the Sinful Church and the Sexual Abuse Crisis,” in *Conitio: Annaberungen an Schuld, Scham und Reue*. (Eds. Julia Exning and Katrina Peetz), Leipzig: Evangelische Verlagsanstalt GmbH (2017).

“Lay Collaboration in Ministry in an Era of Heightened Accountability,” *Proceedings of the Sixty-Fourth Annual Convention of the Canon Law Society of America*. (2002)

“The Honorable Alan B. Handler: The Justice as Craftsman,” 31 *Rutgers Law Journal* xxxiii (2000)

PAPERS AND PRESENTATIONS:

Karl Rahner and the Sinful Church, Conference of the Institute for Reconciliation, Chestnut Hill College, April 19, 2015.

In Honor of Howard Lesnick, Public Interest Recognition Ceremony, University of Pennsylvania Law School, April 11, 2006.

Models of Lay Collaboration, Annual Convention of Canon Lawyers and Tribunal Officials, Diocese of New Orleans, Baton Rouge, Mobile, Shreveport, and Jackson. Baton Rouge, Louisiana, December 2003.

Gifts in Blessed Tension: Affirming the Vocations of Laity and Clergy, Keynote, Academic Convocation, Immaculate Conception Seminary, Huntington, New York, May 2003.

Lay Collaboration in Ministry in an Era of Heightened Accountability, Sixty-Fourth Annual Convention of the Canon Law Society of America, Cincinnati, Ohio, October 9, 2002.

The Status of Immigrants in Southern New Jersey: A Lawyer's Perspective.
Paper Commissioned by the Camden Immigrant Advocacy Project. April 1998.

Public Interest Lawyering in the Post-Entitlement Era, Rebellious Lawyering Conference, Yale University Law School, March, 1997.

On Doing Good, Presentation to the Philadelphia Bar Association, June 1996.

Lay Collaboration and the Mission to Promote Justice, May 1995. Presented to the Annual Convocation of the Maryland Province of the Society of Jesus.

JOHN J. GROGAN

John J. Grogan, a founding partner of the firm, specializes in complex litigation in the areas of constitutional law and civil rights, consumer law and antitrust law.

CONSUMER PROTECTION

Mr. Grogan, along with other members of the firm, has been active in consumer rights litigation and was lead counsel in *Faloney v. Wachovia Bank, NA* (E.D. Pa. 2008). That case alleged RICO violations in that Wachovia conspired with fraudulent telemarketers to defraud hundreds of thousands of consumers. The *Wachovia* case settled in 2008 and yielded one of the largest class recoveries in consumer litigation in the Third Circuit.

In 2015, Mr. Grogan and his colleagues, achieved a significant victory in the Court of Appeals extending the law of class certification in RICO actions against financial institutions alleged to have participated in conspiracies to aid mass marketing consumer fraud. *See Reyes v. Netdeposit*, 802 F.3d 469 (3rd Cir. 2015).

Mr. Grogan, along with Mr. Ackelsberg, represented the Commonwealth of Pennsylvania in an action to combat illegal payday lending using in part RICO-based theories. *See Commonwealth v. Think Finance, Inc.*, 2016 WL 183289 (E.D. Pa. Jan. 14, 2016). In related work, Mr. Grogan, again with Mr. Ackelsberg, successfully lodged objections to a consumer settlement in a payday lending matter in Virginia the result of which was a substantial enhancement of the amount of debt released in that settlement. *Solomon, et al. v. American Web Loan, Inc., et al.*, 17-0145 (2021).

Also using a RICO-framework, Mr. Grogan is engaged in efforts to recover sums paid on fraudulent student loans associated with the notorious trade school, ITT Educational Services. *Aliff et. al. v. Vervent, Inc.*, 20-0697 (S.D. Cal. 2021).

Mr. Grogan and Mr. Ackelsberg are currently litigating three cases involving other instances of payday lending abuse involving the attempted exploitation of Native American sovereign immunity. *See Haremza v. Aaniiih Nakoda Finance, LLC, et al.*, 22-0043 (D.N.J. 2022); *Dearry v. Soaren Management, LLC, et al.*, 21-2548 (E.D. Pa. 2021); *Dearry v. Follis, et al.*, 22-1414 (E.D. Pa. 2022).

CONSTITUTIONAL LAW AND CIVIL RIGHTS

In 2007, Mr. Grogan and Mr. Diver, along with attorneys from the American Civil Liberties Union, obtained a landmark precedent establishing an undocumented alien's fundamental right to marry in a case brought in the Middle District of Pennsylvania. *See Buck v. Stankovic*, 485 F.Supp.2d 576 (M.D. Pa. 2007).

Mr. Grogan, along with Mr. Ackelsberg, challenged the constitutionality of the City of Philadelphia regime for placing liens on landlord properties for their tenants' unpaid gas bills. *See Augustine et. al. v. City of Philadelphia*, 171 F. Supp.3d 404 (E.D. Pa. 2016). In addition, in conjunction with the ACLU and a team of other lawyers, Mr. Grogan and Mr. Leckman represented the plaintiffs in a decision establishing in the Third Circuit a citizen's clear First Amendment right to photograph police activity. *See Fields v. City of Philadelphia*, 862 F.3d 353 (3d Cir. 2017). Mr. Grogan was also part of the team that fought the Trump Administration's efforts to impose the so-called "Muslim Ban" on air travel in 2016. Currently, Mr. Grogan, along with the ACLU, is challenging the constitutionality of Montgomery County's courts' practices of imposing duplicative costs in certain criminal cases. *McFalls v. 38th Judicial District, et. al.*, 4 M.D. 2021 (Pa. Commw. Ct. 2021).

Also with the ACLU, Mr. Grogan is engaged in litigation under the Freedom of Information Act to ascertain the details Immigration Customs Enforcement raids apprehending Philadelphia area immigrants. *ACLU v. U.S. Immigration Customers Enforcement*, 20-2363 (E.D. Pa. 2021).

In conjunction with Justice at Work, Inc., Mr. Grogan litigated labor abuse claims against a local landscaping company. *Castillo-Chaidez v. Hemphill, et. al.*, 18-1837 (E.D. Pa. 2021).

ANTITRUST

Mr. Grogan has litigated a number of high-profile antitrust matters arising in the pharmaceutical industry. *See Sanofi-Synthelabo v. Apotex Inc.* 488 F. Supp. 2d 317 (S.D.N.Y. 2006) and *Chemi, SpA v. GlaxoSmithKline, Inc.*, 385 F.Supp. 2d 514 (E.D. Pa. 2005).

THE CAMDEN CENTER FOR LAW AND SOCIAL JUSTICE, INC.

Prior to joining Langer & Grogan, P.C., Mr. Grogan co-founded and served as the director of the Camden Center for Law and Social Justice, Inc. The Center is a private, non-profit, public interest law firm serving the working poor of Southern New Jersey. Today, the Center employs ten full-time staff and maintains three offices.

TEACHING

Mr. Grogan has served as a Lecturer in Law at the University of Pennsylvania Law School for the last 11 years.

HONORS AND ACHIEVEMENTS

In 1997, Mr. Grogan was named the young attorney with the most outstanding contribution to the public interest by the New Jersey State Bar

Association. In 2000, the Catholic Diocese of Camden awarded Mr. Grogan the St. Thomas More Medal for service to the poor of Camden. In May of 2001, Mr. Grogan was awarded the University of Pennsylvania Law School Alumni Society's Outstanding Young Alumnus Award. In August 2001, Mr. Grogan was named a fellow of the Salzburg Seminar on Human Rights in Salzburg, Austria. In 2002, Mr. Grogan was elected to the Board of Trustees of the Camden Center for Law and Social Justice.

In 2006, Mr. Grogan, along with his colleagues Howard Langer and Edward Diver, was awarded the Champions of Justice Award by Community Legal Services, Inc. of Philadelphia. In September 2007, Mr. Grogan, along with Mr. Diver, was honored by the Hebrew Immigrant Aid Society of Philadelphia for their work in litigating on behalf of the civil rights of undocumented immigrants. In March 2008, Mr. Grogan was elected to the American Law Institute. In November 2011, Mr. Grogan and his colleagues were honored by the Jewish Social Policy Advocacy Network. In 2017, Mr. Grogan was honored for his advocacy on behalf of immigrants by the Hebrew Immigrant Aid Society of Philadelphia. Mr. Grogan has been named a Pennsylvania Super Lawyer annually since 2006.

PERSONAL BACKGROUND AND EDUCATION

John J. Grogan was born in Doylestown, Pennsylvania. In 1983, he graduated from the La Salle College High School in Philadelphia. Mr. Grogan received his Bachelor of Arts in history *cum laude en cursu honorum* from Fordham University in 1988. In 1993, he graduated from the University of Pennsylvania Law School *magna cum laude*. At the Law School, he was the Kramer Public Interest Scholar and was elected to the Order of the Coif. Immediately following law school, Mr. Grogan served as a law clerk to the Hon. Alan B. Handler, Associate Justice of the New Jersey Supreme Court for the 1993-1994 Court term.

Mr. Grogan is married to Mia Grogan. They have three adult children, Jack, Isobel and Catherine, and live in the Mount Airy section of Philadelphia.

John J. Grogan
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Exhibit C

Staff	Date	Total Minutes	Description
aml	4/17/2020	115	initial client interview; review documents
aml	4/20/2020	15	meeting w. YFL to discuss
aml	4/21/2020	10	correspondence with client [REDACTED]
aml	4/22/2020	5	correspondence with client [REDACTED]
aml	4/23/2020	5	correspondence with client [REDACTED]
aml	4/28/2020	5	correspondence with client
aml	5/1/2020	5	admin, fiel upkeep
aml	5/6/2020	25	case review meeting with ALPP, Berger
aml	5/11/2020	35	case review meeting with ALPP, Grogan, Berger
aml	5/12/2020	10	correspondence with client EG
aml	5/13/2020	25	meeting with ALPP
aml	5/14/2020	15	update client [REDACTED]
aml	5/15/2020	50	TC with SSC, SSB, JIG, YFL, AML, RBG
aml	5/16/2020	5	correspondence with client [REDACTED]
aml	5/18/2020	105	review/edit draft complaint, review retainer
aml	5/19/2020	15	correspondence with client [REDACTED]
aml	5/20/2020	240	review/edit draft complaint, case review meeting with ALPP, Grogan, Berger
aml	5/21/2020	255	TC client [REDACTED], retainer agreement, file upkeep, research
aml	5/22/2020	90	review press release, class member communication, research
aml	5/23/2020	15	review press coverage
aml	5/24/2020	40	edit intake form
aml	5/25/2020	35	press intview
aml	5/26/2020	60	interview class member NM, edit intake form, research
aml	5/27/2020	30	class member communication, file upkeep
aml	5/28/2020	20	admin, file upkeep
aml	6/3/2020	15	administrative
aml	6/4/2020	35	class member interview;
aml	6/8/2020	75	edit DFT ADR letter, train intake team on intake form, class member communication
aml	6/9/2020	10	file upkeep, communication with co-counsel re ADR, extension
aml	6/11/2020	10	correspondence with database manager about intakes
aml	6/12/2020	10	correspondence with database manager about intakes; file upkeep
aml	6/18/2020	5	scheduling emails
aml	6/22/2020	75	meeting with opposing counsel to discuss settlement
aml	6/25/2020	20	strategy meeting RBG
aml	6/26/2020	30	communication with class member re: class representation
AML	8/18/2020	25	review D. motion to dismiss
AML	8/19/2020	45	review D. motion to dismiss
AML	8/20/2020	20	review D. motion to dismiss
AML	8/25/2020	10	TC RBG
AML	8/26/2020	30	legal research
AML	8/27/2020	110	legal research, update class rep.
AML	8/28/2020	200	legal research, phone calls with class reps, emails with class reps, edit/draft CA complaint
AML	8/31/2020	10	edit CA complaint
AML	9/1/2020	10	administrative - file upkeep.
AML	9/2/2020	5	update class reps
AML	9/2/2020	25	update class reps
AML	9/3/2020	30	administrative - calendar management, class rep communication
AML	9/21/2020	10	file upkeep, admin
AML	10/15/2020	5	admin - file upkeep
AML	10/21/2020	15	review D. demurrer
AML	10/26/2020	15	plan response to demurrer
AML	10/28/2020	5	plan response to demurrer
AML	10/29/2020	45	plan response to demurrer
AML	10/30/2020	10	DFT response to demurrer
AML	11/2/2020	100	DFT response to demurrer
AML	11/3/2020	30	DFT response to demurrer
AML	11/4/2020	210	DFT response to demurrer
AML	11/5/2020	315	draft response to demurrer
AML	11/6/2020	40	meeting AML, RBG, YFL, JG, DN re demurrer response DFT
AML	11/10/2020	5	draft response to demurrer
AML	11/11/2020	15	draft response to demurrer
AML	11/12/2020	5	file update, emails
AML	11/13/2020	20	phone call re demurrer response, motion to strike response
AML	11/15/2020	150	edit demurrer response, motion to strike response
AML	11/16/2020	10	review final edits to demurrer response
AML	11/16/2020	15	edit response to D's motions
AML	11/17/2020	5	responses filed
AML	11/18/2020	10	update file, TC RBG

AML	11/19/2020	5 PFV applications
AML	11/20/2020	130 PHV applications
AML	11/23/2020	90 phv applications
AML	11/30/2020	60 update ALPP website, class rep communication
AML	12/1/2020	5 email
AML	12/2/2020	5 email
AML	12/3/2020	20 admin
AML	12/10/2020	10 review tentative order
AML	12/10/2020	75 prep for hearing 12/11
AML	12/11/2020	40 prep for CMC and hearing
AML	12/14/2020	10 debrief of hearing
AML	12/28/2020	5 review email to chambers re nominal damages
AML	12/29/2020	5 review email to chambers re nominal damages
AML	1/4/2021	10 review defense letter to chambers
AML	1/5/2021	70 class member call, review order, update website
AML	1/6/2021	15 review draft protection order stip
AML	1/8/2021	20 brainstorm, review discovery request draft
AML	1/15/2021	5 admin
AML	1/22/2021	10 scheduling email
AML	1/25/2021	5 admin
AML	1/26/2021	15 review Gilead's response
AML	1/29/2021	25 scheduling email, website update
AML	2/1/2021	15 file admin
AML	2/5/2021	10 review joint report, update calendar
AML	2/15/2021	5 meeting prep
AML	2/16/2021	100 atty call; [REDACTED]; review protective order edits
AML	2/17/2021	20 class rep call
AML	2/17/2021	90 protective order edits, draft answers to D. questions, research
AML	2/18/2021	5 review correspondence
AML	2/19/2021	20 review mediation documents; draft response to settlement communication questions
AML	2/21/2021	15 draft response to settlement communication questions
AML	3/15/2021	5 admin - email
AML	3/23/2021	30 retrieve and review discovery
AML	3/31/2021	5 file upkeep, email
AML	4/1/2021	10 TC RBG re: discovery
AML	4/5/2021	90 edit mediation statement
AML	4/6/2021	90 edit mediation statement exhibit
AML	4/7/2021	15 mediation prep
AML	4/8/2021	15 mediation prep
AML	4/9/2021	15 mediation prep
AML	4/12/2021	90 mediation prep, meeting
AML	4/13/2021	555 mediation prep, mediation
AML	4/14/2021	270 mediation
AML	4/15/2021	15 mediation post mortem
AML	4/21/2021	70 website, class member recruit strategy discussion
AML	4/23/2021	15 class member recruit strategy discussion
AML	4/26/2021	20 class member outreach planning/prep
AML	4/27/2021	45 class member outreach planning/prep, website update
AML	4/28/2021	70 class member outreach planning/prep, website update
AML	4/29/2021	15 class member outreach plan
AML	4/30/2021	10 class member outreach plan
AML	5/3/2021	15 review discovery requests
AML	5/3/2021	80 atty advertizing rules research
AML	5/4/2021	70 atty advertizing rules research
AML	5/5/2021	30 OR planning, discussion re: discovery requests
AML	5/6/2021	90 eview CA writ rules, Ps' counsel meeting
AML	5/17/2021	30 Enter a brief Description of the task(s).
AML	5/21/2021	40 planning for interrogatories
AML	5/24/2021	55 scheduling call for discovery questions
AML	5/25/2021	340 prep for interview w indiana doe, interview w Indiana Doe; written responses to interrogatories
AML	5/26/2021	15 prep for interview w. missouri doe; prep documents for RFP
AML	5/27/2021	135 interview with misouri doe; written responses to interrogatories, prep documents for RFP
AML	5/28/2021	155 written responses to interrogatories, class rep communication
AML	5/31/2021	80 written responses to interrogatories, class rep communication, prep docs for RFP
AML	6/1/2021	10 file upkeep
AML	6/2/2021	70 class member communication
AML	6/8/2021	35 class member communication
AML	6/9/2021	50 mtg w. [REDACTED] class member communication, class rep retainer
AML	6/11/2021	10 class rep retainer
AML	6/14/2021	20 file upkeep, research

AML	6/17/2021	30 production
AML	6/18/2021	10 review gilead letter
AML	6/22/2021	45 attorney meeting - discovery, amended complaint
AML	6/23/2021	10 class rep communication, research
AML	6/23/2021	30 discovery response, amended complaint
AML	6/24/2021	180 esponse to gilead's deficiency letter
AML	6/25/2021	75 Class Rep communication, Amended COmplaint, admin
AML	6/28/2021	20 deficiency letter
AML	6/29/2021	110 file upkeep, prep for meeting with gilead counsel, meeting with gilead counsel, post-mortem meeting with JA and DN
AML	6/30/2021	25 discovery
AML	7/1/2021	85 class rep communication, strategy meeting with ALPP attys
AML	7/2/2021	45 research, class rep communication
AML	7/6/2021	55 file management - admin, class rep commmunicaiton, amended complaint
AML	7/7/2021	20 review letter from gilead; rsch;
AML	7/9/2021	15 amended complaint
AML	7/12/2021	15 review appellate court decision.
AML	7/13/2021	40 atty meeting re discovery, amended complaint
AML	7/14/2021	25 review upciming deadlines, calendar, response to discovery requests
AML	7/15/2021	50 review letter to counsel, edit amended complaint
AML	7/19/2021	15 TC with RBG
AML	7/20/2021	10 review search terms
AML	7/27/2021	20 case update meeting; supplemental SROG responses
AML	7/28/2021	15 review correspondence from gilead
AML	7/29/2021	15 review CMC rules
AML	7/30/2021	5 file upkeep, review atty emails
AML	8/2/2021	10 file upkeep, review atty emails
AML	8/4/2021	40 supplemental interrogatories, scheduling
AML	8/5/2021	155 supplemental interrrogatories - class rep communication, DFT letter to court for IDC
AML	8/6/2021	35 DFT letter to court for IDC
AML	8/9/2021	10 update file, admin
AML	8/10/2021	155 ICD letter, P.'s counsel meeting
AML	8/11/2021	45 prep materials for IDC
AML	8/12/2021	75 moot IDC, IDC
AML	8/13/2021	25 edit motion to amend
AML	8/17/2021	15 calendar, email
AML	8/18/2021	5 file upkeep
AML	8/19/2021	10 admin
AML	8/23/2021	5 email
AML	8/24/2021	5 email
AML	8/25/2021	5 review summons to lahlouh
AML	8/26/2021	10 admin - file upkeep
AML	9/13/2021	25 admin, opposition to motion to compel
AML	9/14/2021	25 edit opposition to motion to compel, mail vendor service
AML	9/15/2021	5 update file, email
AML	9/20/2021	15 update website
AML	9/23/2021	90 retrieve and review gilead production
AML	9/24/2021	15 filel upkeep
AML	9/28/2021	60 scheduling, file upkeep, review discovery, plaintiffs' attorney meeting
AML	9/29/2021	130 response to FROGS and SROGS, class member communication
AML	9/30/2021	15 motion hearing prep
AML	9/30/2021	25 file upkeep, response to FROGS and SROGS
AML	10/1/2021	90 review gilead's reply brief, class rep communication, prep for interview re: discovery requests
AML	10/4/2021	120 response to Gilead discovery requests
AML	10/5/2021	195 response to Gilead discovery requests
AML	10/6/2021	5 response to Gilead discovery requests
AML	10/7/2021	25 response to Gilead discovery requests
AML	10/12/2021	65 response to Gilead discovery requests, class member communicaiton, review summary of production; counsel meeting
AML	10/13/2021	10 administrative tasks
AML	10/14/2021	65 SROG and FROG responses, class rep communicaiton
AML	10/18/2021	15 email
AML	10/19/2021	15 review CMC docs
AML	10/20/2021	5 review CMC docs
AML	10/22/2021	10 CMC docs, file upkeep
AML	10/25/2021	70 moot discovery motion argument
AML	10/27/2021	100 rev. tentative ruling, MTG with ALPP team re tentative ruling, email, moot for discovery hearing
AML	10/28/2021	40 CMC, hearing
AML	10/29/2021	15 file upkeep, admin
AML	11/2/2021	30 class rep communication, FROGS responses
AML	11/3/2021	10 strategy discussion re lahlouh
AML	11/4/2021	55 srogs, frogs, class rep communication, strategy conversation

AML	11/5/2021	15 file upkeep
AML	11/9/2021	45 P. counsel meeting
AML	11/10/2021	115 discovery and supplemental responses, class rep communication
AML	11/11/2021	50 file upkeep, class rep communication
AML	11/16/2021	75 supplemental answers, class rep communication
AML	11/17/2021	65 supplemental answers, class rep communication
AML	11/18/2021	60 supplemental answers, class rep communication
AML	11/19/2021	10 supplemental answers, class rep communication
AML	11/22/2021	5 file upkeep
AML	11/30/2021	20 discovery follow up
AML	12/1/2021	30 review gilead production
AML	12/2/2021	35 review gilead production
AML	12/3/2021	35 attorney team communications calendar, depositions
AML	12/9/2021	80 plaintiff's counsel meeting
AML	12/10/2021	80 class rep communication, calendar coordination, update file
AML	12/13/2021	100 class rep calls, doc review
AML	12/14/2021	35 doc review, meet and confer
AML	12/15/2021	30 review discovery, edit privilege log letter
AML	12/16/2021	15 doc review, admin
AML	12/17/2021	385 email, file upkeep, review D's production, P's atty meeting
AML	12/20/2021	25 file review
AML	1/4/2022	95 review legal research, meeting prep, counsel meeting
AML	1/5/2022	30 letter, file, class rep communications
AML	1/6/2022	80 admin, meet and confer regarding privilege log & deposition scheduling, class rep communication
AML	1/7/2022	15 admin, deposition scheduling
AML	1/10/2022	70 deposition planning, class rep communication
AML	1/11/2022	15 review gilead correspondence
AML	1/12/2022	45 scheduling meeting, class rep communication
AML	1/13/2022	120 admin, counsel meeting, prep for meet and confer, meet and confer
AML	1/18/2022	35 discovery dispute, class rep communication, deposition scheduling
AML	1/19/2022	65 deposition scheduling, class rep communication
AML	1/20/2022	10 admin, file update
AML	1/21/2022	30 supplemental responses, missouri doe
AML	1/24/2022	75 attorney meeting, class rep communication
AML	1/25/2022	80 scheduling depositions, class rep communication, attorney email, review letter re IDC
AML	1/26/2022	25 scheduling depositions, attorney email, class rep communication
AML	1/27/2022	10 scheduling depositions, attorney email
AML	1/28/2022	20 class rep communication
AML	1/31/2022	65 class rep communication
AML	2/1/2022	15 file update
AML	2/2/2022	20 deposition prep
AML	2/4/2022	40 class rep communication, HIPAA
AML	2/7/2022	105 update file, class rep communication, deposition prep
AML	2/8/2022	95 deposition prep, scheduling email, IDC, attorney meeting, class rep communication
AML	2/8/2022	155 deposition prep, scheduling email, IDC, attorney meeting, class rep communication
AML	2/9/2022	15 deposition logistics, deposition prep
AML	2/10/2022	30 deposition logistics
AML	2/11/2022	125 deposition logistics, class rep communication, dep prep
AML	2/14/2022	20 deposition logistics, tech
AML	2/15/2022	330 deposition tech troubleshooting, logistics, class rep communication; deposition of alabama doe 1
AML	2/16/2022	160 class rep communication, deposition prep.
AML	2/17/2022	60 file update, deposition logistics, class rep communication
AML	2/18/2022	380 deposition tech troubleshooting; deposition of indiana doe
AML	2/21/2022	20 deposition logistics; scheduling
AML	2/22/2022	50 deposition logistics, prep, case review YFL; Meet and confer with D/ counsel
AML	2/23/2022	105 deposition logistics, class rep communication; team meeting; 24 travel, deposition prep
AML	2/24/2022	240 travel, deposition prep;
AML	2/25/2022	480 deposition of missouri Doe, travel
AML	2/28/2022	60 transcript review, class rep communication
AML	3/1/2022	30 class rep communication, file update
AML	3/3/2022	10 class rep communication
AML	3/4/2022	5 scheduling, review emails, admin
AML	3/7/2022	5 review emails, admin
AML	3/8/2022	75 file update; attorney meeting
AML	3/9/2022	5 email
AML	3/10/2022	40 admin, CMC, review settlement proposal email; calendar
AML	3/11/2022	15 admin, file update, email
AML	3/14/2022	10 review settlement conversation, coordinating for depositions
AML	3/15/2022	30 class rep communication, errata
AML	3/16/2022	25 deposition prep, deposition logistics

AML	3/17/2022	125 class rep communication re: settlement
AML	3/21/2022	15 review DFT settlmenet agreement
AML	3/22/2022	15 correspondence re settlement DFT
AML	3/23/2022	15 admin, file housekeeping
AML	3/24/2022	15 class member communication
AML	3/25/2022	5 class member communication
AML	3/28/2022	30 review and edit settlement exhibits
AML	5/2/2022	15 file upkeep
AML	5/11/2022	120 review joint CMC report, review gilead's edits to settlement agreement
AML	5/12/2022	20 discussion of gilead's edits to settlement agreement, scheduling team meeting
AML	5/13/2022	30 Jnt CMC, file upkeep, settlement edits
AML	5/16/2022	30 settlmet agreement position clarification
AML	6/1/2022	5 review edits to settlement agreement
AML	6/2/2022	30 review edits to settlement agreement
AML	6/3/2022	10 review edits to settlement agreement; research
AML	6/7/2022	10 file upkeep
AML	6/17/2022	5 review joint status report
AML	6/21/2022	5 update file.
AML	6/23/2022	5 file update
AML	6/24/2022	5 file update
AML	7/6/2022	5 email
AML	7/8/2022	15 review settlement agreement edits
AML	7/13/2022	5 admin: file, calendar
AML	7/15/2022	15 review edits to settlement agreement
AML	7/18/2022	15 email, review jt statement
AML	7/19/2022	5 file
AML	8/1/2022	5 email, file
AML	8/2/2022	5 email, file
AML	8/9/2022	5 email, file
AML	8/12/2022	5 email, file
AML	8/22/2022	10 file upkeep, email
AML	8/28/2022	5 admin
AML	9/6/2022	5 file, email
AML	9/7/2022	5 file, email
AML	9/9/2022	15 file, status update w RG
AML	9/23/2022	5 email, admin
AML	9/28/2022	10 administrative
AML	9/30/2022	5 email
AML	10/3/2022	5 update file, case related email
AML	10/6/2022	15 calendar, email
AML	10/7/2022	5 admin
AML	10/10/2022	25 class rep communication
AML	10/11/2022	10 email regarding settlement approval
AML	10/12/2022	5 update file, calendar
AML	10/19/2022	10 calendar, file
AML	10/20/2022	20 research, discussion/planning regarding settlement press
AML	10/21/2022	10 file, admin
AML	11/1/2022	5 admin
AML	11/14/2022	5 logistics, calendar
AML	11/30/2022	30 prep for hearing, review tentative ruling, attorney communicaiton to regroup
AML	12/1/2022	10 scheduling
AML	12/2/2022	280 review tentative ruling and prepare response. state law research. cy pres declaration
AML	12/5/2022	40 RBG declaration, state law research; file upkeep
AML	12/6/2022	90 RBG declaration
AML	12/7/2022	180 motion for settlement - supplemental
AML	12/8/2022	15 motion for settlement - supplemental
AML	12/9/2022	180 motion for settlement - supplemental
AML	12/12/2022	60 motion for settlement - supplemental
AML	12/13/2022	10 motion for settlement - supplemental
AML	12/14/2022	35 preparing supplemental settlement materials
AML	12/15/2022	5 admin
AML	12/27/2022	20 file update, email
AML	1/18/2023	15 review order
AML	1/19/2023	20 review order, calendar
AML	1/20/2023	10 email, calendar
AML	1/24/2023	85 post-settlement callmanagement prep
AML	1/26/2023	5 email
AML	1/30/2023	20 post-settlement call management prep
AML	1/31/2023	25 planning for settlement class member calls

INT	6/9/2021	270 Gilead Class
INT	6/10/2021	60 Gilead Class
INT	6/11/2021	30 Gilead Class
INT	6/14/2021	125 Gilead Class
INT	6/16/2021	120 Gilead Class
INT	6/17/2021	180 Gilead Class
INT	6/23/2021	60 Gilead Class
INT	6/30/2021	180 Gilead Class
jmb	4/17/2020	60
RG	4/23/2020	20 t/c plaintiff
RG	5/15/2020	20 t/c/co-counsel
RG	5/18/2020	120 Review complaint.
RG	6/8/2020	30 Review ADR letter.
RG	6/9/2020	15 Review stipulation.
rg	6/22/2020	45 email with other public interest groupsre:P's
rg	6/22/2020	75 prep for call; call with all parties
rg	6/25/2020	20 t/c co-counsel
rg	6/26/2020	90 create docs-sign for class rep; review email for MO class rep
rg	7/10/2020	20 review email
rg	7/14/2020	45 review pleadings
rg	7/27/2020	30 review and respond email re: G offer
rg	8/19/2020	30 review filings
rg	8/27/2020	120 t/c with co-counsel, review email, review state complaint
rg	8/28/2020	30 t/c with co-counsel, review email, review state complaint
rg	8/28/2020	120 draft revisions to state complaint and state law memo.
rg	8/31/2020	45 email correspondence with co-counsel and review CA state law
rg	9/20/2020	45 email with SC re: [REDACTED]
rg	10/20/2020	30 review scheduling emails
rg	10/28/2020	15 review email re dates, co-counsel work
rg	10/30/2020	120 review/draft response motion to dismiss
rg	10/31/2020	60 email with co-counsel
rg	11/2/2020	60 t/c co-counsel, review notes on motion to dismiss.
rg	11/11/2020	60 review doc production related email
rg	11/13/2020	30 review email
rg	11/17/2020	120 opp to moti for demurrer and mot to strike
rg	11/20/2020	120 review response to motion to demurrer /mot to strike
rg	11/23/2020	120 review response to motion to demurrer /mot to strikereview and PHV
rg	11/30/2020	45 review draft case management order and reply to response to demurrer and opp to strike
rg	12/1/2020	45 review draft case management order, reply to response to demurrer and opp to strike and related emails
rg	12/10/2020	120 moot with David, Grogan and Adrlan
rg	12/11/2020	20 review email
rg	12/11/2020	60 moot with DN, JG
rg	12/11/2020	90 case managmee=nt conferece
rg	12/29/2020	45 review email re: list of nominal damage cases
rg	1/4/2021	75
rg	1/5/2021	20
rg	1/5/2021	30
rg	1/11/2021	90
rg	1/22/2021	20
rg	1/25/2021	10
rg	2/1/2021	60 review draft email to D's counsel re: discovery,mediation and case update; t/c co-counsel re: same
rg	2/4/2021	45 email sre: cmc mediator selection and dates
rg	2/5/2021	10 review new cmc order
rg	2/8/2021	20 review c.m. order for new dates; new mediator dates
rg	2/12/2021	30 review email of mediation q's and sked time to disucss
rg	2/16/2021	20 review leg history
rg	2/16/2021	45 t/c co-counsel re: mediation statement
rg	2/16/2021	60 review draft; research mail procedure for mediation statement
rg	2/17/2021	20 review P.O.
rg	2/17/2021	60 t/c with co- counsel re: mail distribution for mediation statement i
rg	3/1/2021	20 review updated P.O.
rg	3/2/2021	10 review executed Protective Order
rg	3/5/2021	45 review filing re interlocutory appeal and stay request
rg	3/15/2021	20 email re: document conversion
rg	3/16/2021	20 email re: document production
rg	3/17/2021	20 email re: Berger doc plan
rg	3/18/2021	50 email re: Berger doc plan

rg	3/22/2021	50	re mails re: discovery, review discovery: state list
rg	3/23/2021	75	emails re: discovery production
rg	3/31/2021	75	email re: relativity platform; draft responses to Gilead discovery requests
rg	4/5/2021	120	review, edits mediation statement and exhibit 1
rg	4/6/2021	75	review, edits mediation statement and exhibit 1; sked mediation
rg	4/13/2021	600	prep and attend mediation - Day 1
rg	4/14/2021	390	mediation - Day 2
rg	4/15/2021	75	t/c social media and co-counsel re settlement
rg	4/16/2021	120	S. Wolfson and CB re: Grindr; email to JQH; t/c JIG re: SC settlement;
rg	4/20/2021	75	review grindr ad requirement; email talento new account; email Co-counsel re media plan; email Joann re: online advertisong
rg	4/21/2021	45	Gilead summary for ALPP website
rg	4/22/2021	45	t/c and email with SS re AHF and potential plaintiff ntiff
rg	4/25/2021	120	update cse summary
rg	4/26/2021	100	emails re: updated summary, posting summary; review ad rates Instinct and Grindr, email to Shamus re: ad rates
rg	4/27/2021	45	email re: update website, email re; ad meeting
rg	4/29/2021	150	mtg and emails re: atty advertsing
rg	5/4/2021	110	review discovery request and email re: co-counsel meeting; review advertising rules; docu-sign retainer
rg	5/5/2021	75	t/c with AML re: [REDACTED]
rg	5/6/2021	240	review e-discovery production plan; reew emails re: stay and writ; email draft to AHF; mtg re: stay, prelim writ, advertising,
rg	5/11/2021	120	review P's draft preliminary objection to writ
rg	5/21/2021	20	review final response to writ
rg	5/26/2021	20	review jt CMC statement
rg	5/27/2021	60	review email and docs re: P's response to Gilead discovery
rg	6/1/2021	30	order re: continued cmc and email re: same
rg	6/8/2021	60	co-counsel mtg, [REDACTED]
rg	6/9/2021	20	email [REDACTED]
rg	6/11/2021	30	email re: docusign and retained to FL rep
rg	6/17/2021	30	review J. Albanese email re: discovery leads
rg	6/18/2021	10	t/c w/AML re: discovery
rg	6/22/2021	75	mtg with co-counsel; t/c AML re: objection
rg	6/23/2021	30	review letter re: extension on mot to compel prodcution
rg	6/24/2021	30	review email re: production
rg	6/28/2021	20	email re: meet and confer
rg	6/29/2021	20	email re: meet and confer
rg	7/1/2021	35	t/c co counsel re: discovery and status
rg	7/7/2021	45	review G's letter re: P's response to interrogs and RFP
rg	7/12/2021	30	review denial Gilead appeal
rg	7/13/2021	50	research re: ethics in contacting Plaintiffs; co-counsel mtg and review next steps
rg	7/14/2021	120	edits to spec interrogs RFP; amended complaint
rg	7/16/2021	60	edits to spec rogs letter; t/c J. Albanese re: same
rg	7/19/2021	20	emails re: records search
rg	7/27/2021	60	co-counsel mtg, email re: motion to compel; email re rules
rg	7/29/2021	15	sked mot to compel
rg	7/30/2021	30	scheduling mot to compel
rg	8/3/2021	20	email re: Alabama Doe; search terms and informal conference
rg	8/5/2021	45	review email re: timeline and codes; email re IFC brief
rg	8/6/2021	20	review IFC letter
rg	8/9/2021	75	edit IDC letter; attned co-counsel meeting,prep IDC
rg	8/12/2021	180	prep, attned Gilead IDC
rg	8/20/2021	30	review emails orders/dates
rg	8/26/2021	30	email re: sealed mption
rg	8/27/2021	30	email [REDACTED]
rg	8/30/2021	20	email with [REDACTED]
rg	8/31/2021	30	email re: [REDACTED]
rg	9/14/2021	75	review motion to compel, t/c co-counsel, email PB re: epxert
rg	9/23/2021	30	emails re: discovery
rg	9/28/2021	110	review discovery, team mtg; realtivey account
rg	10/1/2021	15	review emails re: CMC
rg	10/12/2021	30	t/c co-counsel
rg	10/25/2021	75	co-counsel t/c, review pleadins
rg	10/27/2021	75	review tentative; email and t/c to co-counsel;
rg	10/28/2021	125	t/c [REDACTED], Gilead mot to oppose
rg	11/9/2021	60	mtg with co-counsel, review emails
rg	11/15/2021	60	email with [REDACTED] review with [REDACTED]
rg	11/23/2021	30	review email re: discovery production
rg	12/2/2021	45	q re: accessing production; email with J.A. re: dep notices
rg	12/3/2021	20	sked mtg; t/c co-counsel re: status
rg	12/9/2021	75	mtg co-counsel
rg	12/13/2021	180	review RIOCH, HB
rg	12/14/2021	45	relativity production

rg	12/15/2021	60 production review
rg	12/16/2021	120 review privilege letter, and upload HB
rg	12/17/2021	75 t/c with co-counsel; t/c AML re: doc production
rg	12/20/2021	75 t/c J. Grogan, t/c J. Albanese, t/c ALPP
rg	12/22/2021	30 emails protective order, deps
rg	12/28/2021	30 t/c [REDACTED]
rg	12/30/2021	45 review Lahlouh production
rg	1/2/2022	review correspondence re: privilege log
rg	1/10/2022	30 review dep emails
rg	1/13/2022	60 mtg to discuss settlement, 3rd party discovery
rg	1/24/2022	60 mtg re 3rd party discovery, P ¹ deps.
rg	2/1/2022	30 review email re: med records, 3rd party discovery
rg	2/3/2022	60 edit brief for IDC
rg	2/4/2022	15 email re IDC brief
rg	2/8/2022	75 IDC, mtg with counsel, review IDC brief
rg	2/9/2022	120 email with JIG re: IDC
rg	2/15/2022	60 t/c with co-counsel re settlement terms
rg	2/22/2022	60 t/c with co-counsel re settlement terms
rg	2/28/2022	30 email with co-counsel
rg	3/8/2022	100 t/c JIG re: settlement, co-counsel meeting, review time charts, settlement offer
rg	3/14/2022	30 t/c co-counsel, review settlement email.
rg	3/15/2022	15 email re stay on deps
rg	3/25/2022	45 review settlement exhibitvts
rg	4/20/2022	20 review extensio nemail
rg	5/12/2022	120 review settlement docs
rg	5/16/2022	30 t/c AML
rg	6/1/2022	30 review Gilead settlement
rg	6/2/2022	30 review Aetna settlement terms for comparison
rg	6/17/2022	30 email re CMC joint statement
rg	7/7/2022	30 slection Cy pres
rg	7/12/2022	30 review settlement drafts
rg	7/29/2022	30 review settlementn docs
rg	8/8/2022	90 review mot to approval of settlement
rg	8/9/2022	15 t/c Co-counsel re: settlement
rg	8/19/2022	60 email re : cy pres
rg	8/28/2022	90 edits for prelim motion (ALPP CV)
rg	8/30/2022	60 reiev mot for prelim apporval, etc
rg	9/6/2022	10 review joint status report
rg	9/16/2022	30 reiev jt settlement, update cy pres
rg	9/23/2022	20 review jt status report
rg	9/30/2022	15 review joint standing order
rg	10/3/2022	30 emails re: non-dispargement
rg	10/6/2022	20 sked hearing, update to cy pres
rg	10/11/2022	15 review filing
rg	12/4/2022	45 PWN dec
rg	12/9/2022	150 email to Naina, edits to supp filing, PWN dec
rg	12/14/2022	30 PWN dec
rg	12/19/2022	30 review supp filings ,
rg	12/21/2022	75 t/c Grogan, edit RBG dec, email Naina
rg	12/22/2022	30 review suppl
rg	12/26/2022	20 review email suppl submission
rg	1/19/2023	30 reiewi order; email with co-counsel re: approval
rg	1/24/2023	30 review settlement scripts
rg	1/26/2023	20 review edits to settlement notice
YFL	10/27/2012	90 review tentative ruling, meeting with ALPP team about tentative ruling, moot for discovery hearing
YFL	5/15/2020	20 t/c with co-counsel
YFL	5/15/2020	120 reviewing complaint
YFL	6/8/2020	25 reviewing ADR letter
YFL	6/9/2020	25 review stipulation
YFL	6/22/2020	15 t/c with co-counsel
YFL	6/22/2020	35 t/c with Gilead counsel
YFL	7/13/2020	15 reviewing stipulation and declaration
YFL	7/28/2020	15 reading emails about settlement
YFL	7/30/2020	30 co-counsel confernece call
YFL	7/31/2020	20 lreviewing egal research).
YFL	8/25/2020	30 meeting with co-ccounsel
YFL	8/25/2020	30 reviewing D motion to dismiss in federal court
YFL	8/25/2020	45 research for state cpmplaint
YFL	8/31/2020	60 review state court complaint

YFL	11/2/2020	60 Enter a brief Description of the task(s).
YFL	11/3/2020	40 Enter a brief Description of the task(s).
YFL	11/4/2020	60 Enter a brief Description of the task(s).
YFL	4/5/2021	45 Enter a brief Description of the task(s).
YFL	4/13/2021	45 researching post office manual
YFL	4/13/2021	330 mediation
YFL	4/14/2021	180 mediation
YFL	5/6/2021	90 meeting with alpp team regarding strategy for reaching potenital class memebbers.
YFL	5/6/2021	100 Review writ standards and meeting with co-counsel
YFL	7/1/2021	35 Discovery update with yfl, rg and aml
YFL	7/13/2021	30 meeting with co-counsel
YFL	7/16/2021	30 review draft letter tomopposing counsel
YFL	7/27/2021	30 Co-counsel meeting
YFL	8/11/2021	30 meeting with co-counsel regarding IDC
YFL	8/12/2021	30 IDC
YFL	8/12/2021	30 moot with co=counsel for IDC
YFL	9/28/2021	30 Discovery/motion to compel strategy meeting with co-counsel
YFL	10/12/2021	30 ALPP co-counsel discovery meeting
YFL	10/25/2021	75 moot argument for discovery motion
YFL	11/9/2021	45 Enter a brief Description of the task(s).co-counsel meeting re discovery
YFL	12/9/2021	45 meeting w ALPP, Grogan and Berger regarding discovery
YFL	12/15/2021	75 reading Lahlouh's discovery responses
YFL	12/16/2021	120 reading Lahlouh's discovery responses
YFL	12/21/2021	45 reading Lahlouh's discovery responses
YFL	12/30/2021	100 drafting summary of Lahlouh's discovery responses
YFL	1/4/2022	60 mtg w/co-counsel re discovery
YFL	1/13/2022	60 mtg w/ co-counsel re meet and cionfer
YFL	1/24/2022	60 mtg w/ co-counsel re discovery
YFL	2/23/2022	60 meeting with co-counsel
YFL	3/8/2022	45 co-counsel meeting to discuss settlement proposal
YFL	3/15/2022	30 reading proposed settlement emails
YFL	3/17/2022	30 reviewing proposed settlement emails
YFL	3/21/2022	45 reviewing draft settlement agreement
YFL	3/22/2022	15 reading proposed edits to settlement agreement
YFL	12/2/2022	20 Co-counsel meeting regarding changes to settlement agreement

Exhibit D

Date	Timekeeper	Description	Time
5/15/2020	D. Nagdeman	Gilead - Telephone Conference Call	0.50
5/15/2020	J. Grogan	(Gilead) Call with larger group on extent of data breach.	0.40
5/18/2020	D. Nagdeman	Gilead - Telephone Conference Call	0.50
5/18/2020	D. Nagdeman	Gilead - Complaint Draft Review	1.00
5/18/2020	J. Grogan	(Gilead) review compliant draft and call on same	1.40
5/19/2020	J. Grogan	General) Draft of Retainer Agreement for General Consulting	1.10
5/20/2020	D. Nagdeman	Gilead - Telephone Conference Call	0.50
5/20/2020	J. Grogan	(Gilead) Reviews of complaint draft and retainer agreement. Call on Complaint Draft	0.80
5/21/2020	D. Nagdeman	Gilead - Complaint Draft Review	0.30
5/21/2020	J. Grogan	Gilead) Final review and edits to Complaint and press release	1.20
5/22/2020	D. Nagdeman	Gilead - Press Release Draft	0.50
6/8/2020	D. Nagdeman	Gilead - Draft letter review	1.00
10/27/2020	J. Grogan	(Gilead) Initial review of Demurer	1.20
10/28/2020	D. Nagdeman	Gilead - Demurrer Response drafting	1.60
10/28/2020	J. Grogan	(Gilead) Research on Response to Motion to Dismiss	2.70
10/29/2020	D. Nagdeman	Gilead - Demurrer Research	3.00
10/30/2020	D. Nagdeman	Gilead - Demurrer Research	2.60
10/30/2020	J. Grogan	(Gilead) Research on motion to dismiss	3.50
10/31/2020	J. Grogan	(Gilead) research on motion to dismiss	1.20
11/2/2020	D. Nagdeman	Gilead - Demurrer Response drafting	6.00
11/2/2020	D. Nagdeman	Gilead - Discussion re demurrer	1.00
11/2/2020	J. Grogan	(Gilead) Draft of response on demurer	4.50
11/3/2020	D. Nagdeman	Gilead - Demurrer Response drafting	4.20
11/4/2020	D. Nagdeman	Gilead - Demurrer Response drafting	7.80
11/4/2020	J. Grogan	(Gilead) review of dismissal response drafts	1.10
11/5/2020	D. Nagdeman	Gilead - Demurrer Response drafting	2.00
11/5/2020	J. Grogan	(Gilead) Work on demurrer response	2.20
11/9/2020	D. Nagdeman	Gilead - Demurrer Response drafting	4.00
11/10/2020	D. Nagdeman	Gilead - Demurrer Response drafting	7.70
11/10/2020	J. Grogan	(Gilead) Draft and edit response brief	6.60
11/11/2020	D. Nagdeman	Gilead - Demurrer Response drafting	3.00
11/11/2020	J. Grogan	(Gilead) draft and edit demurrer response	3.20
11/12/2020	J. Grogan	(Gilead) work on revised draft	3.20
11/13/2020	D. Nagdeman	Gilead - Demurrer Response drafting	6.20
11/13/2020	J. Grogan	Gilead further revisions on motion to dismiss & Motion to Strike	2.40
11/13/2020	J. Grogan	Gilead Team call	0.40
11/14/2020	J. Grogan	(Gilead) Revision of motion	1.40
11/16/2020	D. Nagdeman	Gilead - Demurrer Response drafting	3.50
11/16/2020	D. Nagdeman	Gilead - Discussion re demurrer	0.50
11/16/2020	J. Grogan	(Gilead) final revisions to demurrer response and motion to strike response	2.40
11/17/2020	D. Nagdeman	Gilead - Demurrer Response drafting	1.00
11/17/2020	J. Grogan	(Gilead) final review of papers prior to filing	1.50
11/17/2020	J. Grogan	(Aetna) Review of Google Cooki and confer with RG	0.80
11/20/2020	D. Nagdeman	Gilead - PHV Apps	1.30
11/25/2020	D. Nagdeman	Gilead - Case management report review	0.40
12/10/2020	D. Nagdeman	Gilead - Moot for hearing	0.50
12/10/2020	J. Grogan	(Gilead) moot for oral argument and review of tentative.	1.20
12/11/2020	D. Nagdeman	Gilead - Hearing on Demurrer	1.50
12/11/2020	D. Nagdeman	Gilead - Moot for hearing	0.50
12/29/2020	D. Nagdeman	Gilead - Contract cases research	1.50
1/6/2021	D. Nagdeman	Gilead - Protective Order Review	0.50
1/8/2021	D. Nagdeman	Gilead - Discovery production draft	1.00
2/1/2021	D. Nagdeman	Gilead - ADR email review	0.20
2/4/2021	D. Nagdeman	Gilead - ADR Joint Statement review	0.50
2/16/2021	D. Nagdeman	Gilead - Case Management call	0.50
2/16/2021	D. Nagdeman	Gilead - Legal research into legislative history of CMIA	2.20
3/5/2021	D. Nagdeman	Gilead - Review of interlocutory appeal filing	0.40
3/17/2021	D. Nagdeman	Gilead - Review of discovery materials	0.50
3/17/2021	J. Grogan	(Gilead) review of ediscovery agreement	0.70
4/6/2021	D. Nagdeman	Gilead - Review of mediation statement	0.50
4/12/2021	D. Nagdeman	Gilead - Premediation call	1.00
4/13/2021	J. Grogan	(Gilead) mediation	8.50
4/14/2021	D. Nagdeman	Gilead - Mediation	8.00
4/14/2021	J. Grogan	(Gilead) Second Day of Mediation	5.40
4/15/2021	D. Nagdeman	Gilead - Mediation	6.00
5/6/2021	D. Nagdeman	Gilead - case management call	0.50
5/10/2021	D. Nagdeman	Gilead - Preliminary response to writ of mandate	2.50
5/21/2021	D. Nagdeman	Gilead - Preliminary response to writ of mandate	0.50
5/21/2021	D. Nagdeman	Gilead - CMC review	0.50

Date	Timekeeper	Description	Time
6/2/2021	D. Nagdeman	Gilead - Discovery review	0.50
6/22/2021	D. Nagdeman	Gilead - Case Management call	0.50
6/29/2021	D. Nagdeman	Gilead - Meet and Confer	1.20
7/6/2021	D. Nagdeman	Gilead - Discovery letter draft	2.00
7/7/2021	D. Nagdeman	Gilead - Discovery letter draft	2.50
7/13/2021	D. Nagdeman	Gilead - Case Management call	0.50
7/13/2021	J. Grogan	(Gilead) Team meeting	0.40
7/19/2021	D. Nagdeman	Gilead - Search term review	2.50
8/10/2021	D. Nagdeman	Gilead - Case Management call	0.50
8/10/2021	D. Nagdeman	Gilead - Dispute letter	0.50
8/13/2021	D. Nagdeman	Gilead - draft motion leave to amend	0.50
9/2/2021	J. Grogan	(Gilead) Confer with KT re motion to compell response	0.60
9/5/2021	J. Grogan	(Giilead) review and response to Motion to Compel	2.20
9/13/2021	J. Grogan	(Gilead) review internal edits to resp to motion to compell	0.70
9/14/2021	J. Grogan	(Gilead) Team Meeting	0.60
9/14/2021	J. Grogan	(Gilead) Review of Revised Opp. Motion to Compel	0.80
9/15/2021	J. Grogan	(Gilead) final edits to opp. mot. comp.	0.80
10/12/2021	J. Grogan	(Glilead) prep for and participate in team meeting	1.40
10/25/2021	J. Grogan	(Gilead) prep for and conduct moot for motion to compel	2.60
10/25/2021	Kevin Trainer	Attend mootng for motion to compel, prep and followup.	1.50
10/27/2021	J. Grogan	(Gilead) review tentative and meet re same	1.20
10/28/2021	J. Grogan	(Gilead) attend argument on motion to compel	0.50
11/9/2021	Kevin Trainer	Attended team meeting, plus prep.	1.00
12/17/2021	J. Grogan	(gilead) Team call and doc review	1.70
12/19/2021	J. Grogan	(Gilead) DOc review batch one and report	2.40
12/21/2021	J. Grogan	(Gilead) report on batch review	0.80
12/27/2021	Kevin Trainer	prepare and finalize memorandum on CMIA claim.	2.50
12/28/2021	Kevin Trainer	Began researching [REDACTED]	2.00
12/29/2021	Kevin Trainer	Began researching [REDACTED]	2.00
12/30/2021	Kevin Trainer	Began researching [REDACTED]	2.00
12/31/2021	Kevin Trainer	Began researching a [REDACTED]	2.00
12/31/2021	Kevin Trainer	Researching alternative [REDACTED]	2.00
1/1/2022	Kevin Trainer	Researching alternative [REDACTED]	2.00
1/2/2022	Kevin Trainer	Researching alternative CM [REDACTED]	2.00
1/4/2022	J. Grogan	(Gilead) Team call; review of Trainer memo	1.20
1/4/2022	Kevin Trainer	Finished drafting [REDACTED] and	8.00
1/11/2022	J. Grogan	(Gilead) review of gilead response on settlement and witness outreach	0.70
1/12/2022	Kevin Trainer	analyzed discovery and deposition proposals.	1.50
1/13/2022	J. Grogan	(gilead) discovery prep, team meeting discussion	0.80
1/13/2022	Kevin Trainer	joined call with trial team to discuss discovery/deposition strategy; prepared for a met	2.50
1/19/2022	J. Grogan	(Gilead) consult with Lowe re dep. Arrnage for Tampa office space	0.70
1/24/2022	J. Grogan	(Gilead) Team meeting	0.60
1/24/2022	Kevin Trainer	attend team meeting	1.00
1/26/2022	Kevin Trainer	Review draft email to opposing counsel, offer edits.	0.25
1/28/2022	Kevin Trainer	Reviewed discovery proposals and defendants' responses to them.	0.50
1/31/2022	Kevin Trainer	Prepare for and attend team meeting concerning next steps for depos; worked on	2.75
2/7/2022	J. Grogan	(Gilead) call RG re discovery requests	0.20
2/15/2022	J. Grogan	(Gilead) prep for and attend dep of Alabama Doe 1	5.10
2/16/2022	J. Grogan	(Gilead) review of Alabama Doe dec. Call with Team re dep debrief; prep for and	6.40
2/22/2022	J. Grogan	(Gilead) prep for deposition in Boston.	1.40
2/22/2022	J. Grogan	Gilead meet and confer	0.40
2/22/2022	J. Grogan	Call Goldfein and Albanese	0.40
2/23/2022	J. Grogan	Gilead. Call on discovery and settlemnt	0.70
2/23/2022	Kevin Trainer	Prepare for and attend team strategy meeting.	1.50
2/24/2022	J. Grogan	Travel to and prep for Boston Dep	7.00
2/25/2022	J. Grogan	Gilead Deposition of Missouri Doe	7.00
3/8/2022	Kevin Trainer	Prepared for and attended team strategy call. Reviewed and revised memorandum	2.50
3/8/2022	Kevin Trainer	Prepared for and met with co-counsel to discuss settlement progress and strategy.	2.25
3/15/2022	Kevin Trainer	Reviewed email from co-counsel discussing framework for settlement, drafting	0.75
3/22/2022	Kevin Trainer	Reviewed settlement agreement, summarized edits and thoughts to team.	1.00
5/12/2022	Kevin Trainer	Reviewed Case-Management-Conference order and provided nits.	0.75
8/9/2022	J. Grogan	(Gilead) Review settlement brief and t/c with Ronda	1.10
10/3/2022	J. Grogan	(Gilead) Declaration in Support of Settlement	0.80

Grand Total

255.05