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7 *One of Attorneys for Plaintiffs and the Class*

8
 9 **UNITED STATES DISTRICT COURT**
 10 **CENTRAL DISTRICT OF CALIFORNIA**

11 MEGAN SCHMITT, DEANA
 12 REILLY, CAROL ORLOWSKY, and
 13 STEPHANIE MILLER BRUN,
 individually and on behalf of
 themselves and all others similarly
 14 situated,
 Plaintiffs,
 15
 v.
 16 YOUNIQUE, LLC,
 17 Defendant.
 18

Case No. 8:17-cv-01397-JVS-JDE

**DECLARATION OF ALISON M.
 BERNAL IN SUPPORT OF
 PLAINTIFF'S MOTION FOR AWARD
 OF ATTORNEYS' FEES AND
 REIMBURSEMENT OF LITIGATION
 EXPENSES TO CLASS COUNSEL AND
 SERVICE AWARDS**

Complaint Filed: 8/17/17

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 21 I, Alison M. Bernal, hereby declare:

22 1. I am a partner in the law firm of Nye, Stirling, Hale & Miller, LLP. I
 23 submit this declaration in support of Class Counsel's Motion for Award of
 24 Attorneys' Fees and Reimbursement of Litigation Expenses to Class Counsel and
 25 Service Awards. I have personal knowledge of the matters set forth herein based
 26 upon my active supervision and participation in all material aspects of the litigation.
 27

1 and \$175 per hour for paralegals. The partners who worked on this case were
2 Jonathan Miller and Alison Bernal. Mr. Miller has been practicing for 17 years. Ms.
3 Bernal has been practicing for 10 years. Prior to joining Nye, Stirling, Hale &
4 Miller, Mr. Miller practiced at a large international firm, and Ms. Bernal at a larger
5 regional firm, for several years. Mr. Miller joined NSHM eleven years ago and is
6 the managing partner. Ms. Bernal joined NSHM six years ago as a partner. Lindsey
7 LeBlanc was the lead paralegal who worked on the case. Ms. LeBlanc attended law
8 school before becoming a paralegal. She has been a paralegal for over ten years.

9 6. My work on this matter, which has occupied a considerable portion of
10 my time since its inception, has precluded me from taking on more hourly work.

11 7. As of November 1, 2019, the total number of hours expended on this
12 litigation by my firm is 251.70 hours. The number of hours reflects the extensive
13 litigation this case required over its two-year lifespan, including opposing motions
14 to dismiss, a motion for summary judgment, moving for class certification, and
15 opposing a motion for decertification, as well as numerous depositions and trial
16 preparation. We did not include any time spent traveling for the various hearings,
17 mediations, or depositions. We cut 26 hours of travel time, or \$15,600 in fees
18 incurred travelling. Additionally, when reviewing our expenses in preparation for
19 the motion, and in furtherance of the goals of serving the class, we cut an additional
20 19 hour of work spent on the case, or \$11,400 in fees. Thus, in total, we cut \$27,000
21 in fees from those we are requesting.

22 8. The total lodestar based on the law firm's current rates is \$131,173
23 when rounded to the nearest dollar. The time described above does not include
24 charges for expense items. Expense items are billed separately and such charges are
25 not duplicated in my firm's billing rates. Based upon my firm records, my firm has
26 incurred a total of \$5,974 in un-reimbursed expenses in connection with the
27 prosecution of this litigation. The expenses are broken down as follows:

Expense Category	Total
Process server fees (majority of charges relate to service of mandatory chambers copies)	\$4,405.00
Deposition fees (transcript)	\$1,168.55
Pro Hac Vice filing fees	\$400.00
Total Expenses	\$5,974.00

9. The expenses incurred in this action are reflected on the books and records of my firm, which are available at the request of the Court. These books and records are prepared from expense vouchers, check records, and other source materials and are an accurate record of the expenses as charged by the vendors. Third-party expenses are not marked up. It is anticipated that costs will continue to accrue including but not limited to travel to the April 6, 2020, Final Fairness Hearing in this matter, and service fees for the chambers copies of the motions for final approval and the motion for attorneys' fees.

10. I have general familiarity with the range of hourly rates typically charged by plaintiffs' class action counsel in the district where my firm practices and throughout the United States, both on a current basis and historically. From that basis, I am able to conclude that the rates charged by my firm are commensurate with those prevailing in the market for such legal services furnished in complex class action litigation, such as this, especially those involving a technical scientific aspect.

11. I and my partner Mr. Miller have acquired substantial experience in class actions and other complex litigation and have obtained favorable settlements as class counsel. My firm has been class counsel in the following class actions: representing a class of consumers who purchased defective car seats (*Julian v. Evenflo Co., Inc.* [Central District of California Case. No. 2:14-CV-01774 RKG-AS]); representing a class of consumers alleging false advertising claims against FRS, who marketed health care products based on Lance Armstrong's use of such

1 products, when in fact it was Armstrong’s use of anabolic steroids that contributed
2 to his success (*Hyle, et al. v. FRS, et al.* [Central District of California Case No. CV
3 13-01456 BRO (MANx)]); representing a class of consumers alleging false
4 advertising claims against Pharmavite for its marketing of Vitamin E supplements
5 (*Weintraub v. Pharmavite, LLC* [Central District of California Case No. 2:14-cv-
6 03218]); represented a class of consumers alleging false advertising claims against
7 Walmart to the Ninth Circuit (*Boris v. Walmart* [Ninth Circuit Case No. 14-55752]);
8 defended a corporation against class claims of wage and hour violations [*Knapp v.*
9 *Cellular Sales of California* [Santa Barbara Superior Court Case No. 17CV03596]];
10 representing a class of consumers who purchased vehicles with defective engines (*In*
11 *re Kia Engine Litigation* [Central District of California Case No. 8:17-cv-00838-
12 JLS-JDE]); representing a class of mobility-disabled consumers injured by
13 excessive sloping in parking lots, in violation of the ADA (*Shetler v. Amerco Real*
14 *Estate Company; U-Haul International, Inc.* [W.D. Penn. Case No. 2:18-cv-00867];
15 *Sigmon v. Tanger Factory Outlet Centers, Inc., et al.* [Dist. of S.C., Case No. 2:18-
16 CV-03325]; *Sigmon v. Bridgestone Americas, Inc., et al.* [Dist. of S.C., Case No.
17 2:18-cv-03324]; *Murphy v. Aaron’s, Inc.* [Dist. of Colo., Case No. 1:19-cv-601];
18 *Murphy v. Western Alta Holdings, LP, et al.* [Dist. of Colo., Case No. 1:19-cv-498];
19 *Block, et al. v. Red Lobster Management, LLC* [N.D. Ill., Case No. 1:19-cv-01434];
20 *Murphy v. United States Beef Corp.* [Dist. Colo., Case No. 1:19-cv-471]; *Sigmon v.*
21 *Urban Edge Properties, et al.* [Dist. S.C., Case No. 2:2018-cv-01354]; *Kouri, et al.,*
22 *v. Regency Centers Corp.* [Dist. Colo, Case No. 1:19-cv-00658]; *Dieter v. Aldi, Inc.*
23 [W.D. Penn., Case No. 2:2018-cv-00846]; *Mellenthin, et al., v. Casey’s General*
24 *Stores, Inc.* [S.D. Ill., Case No. 3:2017-cv-00068]; defended a corporation against
25 class claims of illegal recording of telephone calls (*Zamar v. Mercury* [Los Angeles
26 Superior Court Case No. C469266]); defended a corporation against claims of wage
27 and hour violations (*Johnson v. Renaud’s Bakery & Bistro, Inc.* [Los Angeles

1 Superior Court Case No. 19STCV35046]).

2 12. The instant matter required an extensive amount of litigation, up to and
3 including trial preparation. Due to my firm's practice in the Central District, and
4 before this Court in particular, we have specific knowledge of the local rules for
5 general litigation and trial preparation.

6 13. My firm's work in this case includes, but is not limited to: liaison with
7 clients and potential clients; reviewing and editing all documents before filing and
8 service; defending clients at depositions; appearing and arguing at status
9 conferences and hearing; corresponding with counsel for Defendant; corresponding
10 with and handling negotiations and disputes with opposing counsel; conducting
11 legal research and developing Plaintiffs' claims; working with co-counsel to develop
12 arguments related to class certification under Fed. R. Civ. P. 23; engaging in
13 extended settlement discussions with defense counsel; addressing disputes related to
14 the form and methods of disseminating the settlement notice; data processing,
15 coding and mathematical modeling cross checks for damages; drafting pretrial
16 documents; working through various disputes regarding and iterations of pretrial
17 documents with Defendant; drafting and revising motion papers and briefs
18 submitted to the court during the settlement approval phase; drafting all applications
19 to seal and making appropriate redactions. The foregoing is just a general summary
20 of the work I and my firm have done on this case to date. There are other unlisted
21 items that can be seen in the time records produced by me in this matter. I and my
22 firm have devoted a significant amount of my time to this case since the inception of
23 this case reach the current benefit for the class.

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

25 Signed this 18th day of November, 2019, in Santa Barbara, California.

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/S/

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ALISON M. BERNAL, Declarant

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Transaction Date	Timekeeper	Time Spent (Hourly Rate	Lodestar	Description
8/21/2017	Alison M. Bernal	0.80	\$600.00	\$480.00	Preparation of notices of appearance for Alison Bernal and Jonathan Miller.
8/23/2017	Alison M. Bernal	0.50	\$600.00	\$300.00	Exchange multiple emails with co-counsel re: Preparation of Hac Vice applications.
8/23/2017	Alison M. Bernal	0.40	\$600.00	\$240.00	Review of Pro Hac Vice applications in preparation of filing.
8/25/2017	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange multiple emails re: Walsh Pro Hac Vice application.
8/25/2017	Alison M. Bernal	0.40	\$600.00	\$240.00	Review of PHV application of Walsh in preparation of filing.
8/28/2017	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange multiple emails re: Kilpela Pro Hac Vice application.
8/28/2017	Alison M. Bernal	0.20	\$600.00	\$120.00	Review of Pro Hac Vice application of Kilpela in preparation of filing.
9/11/2017	Alison M. Bernal	0.90	\$600.00	\$540.00	Review and analysis of initial case management order from Judge Selna to ensure compliance with dates.
9/28/2017	Alison M. Bernal	0.40	\$600.00	\$240.00	Exchange multiple correspondence re: proposed order on stipulation extending time to respond to complaint.
10/13/2017	Alison M. Bernal	2.90	\$600.00	\$1,740.00	Preparation of extensive revisions and edits to First Amended Complaint.

10/13/2017	Alison M. Bernal	0.50	\$600.00	\$300.00	Exchange multiple correspondence with co-counsel re: First Amended Complaint.
11/2/2017	Alison M. Bernal	0.40	\$600.00	\$240.00	Exchange multiple correspondence with co-counsel re: local rule relating to timing of class certification motion and plan going forward.
11/3/2017	Alison M. Bernal	1.90	\$600.00	\$1,140.00	Review and analysis of Defendant's motion to dismiss and exchange multiple emails re: strategy in opposing motion.
11/5/2017	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange multiple emails re: clarifying request to court re: class certification deadline.
11/6/2017	Alison M. Bernal	2.30	\$600.00	\$1,380.00	Preparation of stipulation and proposed order re class certification continuance; emails with clerk, emails with co-counsel.
11/8/2017	Alison M. Bernal	0.60	\$600.00	\$360.00	Review and analysis of Court's order and exchange multiple emails with co-counsel re: class certification deadlines.
11/12/2017	Alison M. Bernal	0.20	\$600.00	\$120.00	Exchange correspondence with co-counsel re: opposition to motion to dismiss.

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11/13/2017	Alison M. Bernal	2.10	\$600.00	\$1,260.00	Exchange multiple emails re: opposition to motion to dismiss, and further preparation of opposition to motion to dismiss.
11/28/2017	Alison M. Bernal	0.50	\$600.00	\$300.00	Rule 26 disclosures and Review and analysis of tentative order, multiple emails with co-counsel re: arguments and hearing on motion to dismiss.
12/1/2017	Alison M. Bernal	1.60	\$600.00	\$960.00	Preparation of revisions and edits to Rule 26 report and exchange multiple correspondence with counsel re: same.
12/4/2017	Alison M. Bernal	0.90	\$600.00	\$540.00	Exchange multiple emails with co-counsel and defense counsel re: scheduling conference.
12/6/2017	Alison M. Bernal	0.50	\$600.00	\$300.00	Exchange correspondence with counsel re: scheduling conference.
12/10/2017	Alison M. Bernal	0.20	\$600.00	\$120.00	Exchange multiple correspondence with counsel re: Second Amended Complaint.
1/3/2018	Alison M. Bernal	0.40	\$600.00	\$240.00	Exchange multiple correspondence with counsel re: Second Amended Complaint; revise and edit Second Amended Complaint for filing.
1/4/2018	Alison M. Bernal	1.60	\$600.00	\$960.00	

1/10/2018	Alison M. Bernal	0.40	\$600.00	\$240.00	Review and analysis of Rule 26 disclosure in preparation for serving.
1/11/2018	Alison M. Bernal	0.60	\$600.00	\$360.00	Review and analysis of defendant's rule 26 disclosures.
1/18/2018	Alison M. Bernal	0.50	\$600.00	\$300.00	Review and analysis of defendant's answer.
2/8/2018	Alison M. Bernal	1.10	\$600.00	\$660.00	Preparation of revisions and edits to Request for Production, set one, to defendant.
3/16/2018	Alison M. Bernal	0.80	\$600.00	\$480.00	Review and analysis of defendant's discovery responses.
3/22/2018	Alison M. Bernal	2.10	\$600.00	\$1,260.00	Telephone call with potential client related to Younique sellers and exchange multiple correspondence with counsel re: same.
4/25/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange multiple correspondence with co-counsel re: client depositions.
4/25/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange multiple correspondence with co-counsel re: discovery meet and confer requirements.
4/26/2018	Alison M. Bernal	0.50	\$600.00	\$300.00	Telephone call and multiple emails with co-counsel re: defendants' document production.

4/27/2018	Alison M. Bernal	1.50	\$600.00	\$900.00	Preparation of deposition objections for 4 clients, and multiple emails with co-counsel re: same.
5/1/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange multiple emails with co-counsel re: scheduling extension.
5/2/2018	Alison M. Bernal	0.40	\$600.00	\$240.00	Exchange multiple emails with co-counsel re: scheduling extension.
5/4/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Telephone call with defense counsel re: proposed extension.
5/8/2018	Alison M. Bernal	1.30	\$600.00	\$780.00	Exchange multiple emails with defense counsel, co-counsel re: defendant's settlement offer, including analysis of aggregate offer.
5/8/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange multiple emails with defense counsel re: scheduling extension.
5/9/2018	Alison M. Bernal	0.80	\$600.00	\$480.00	Exchange multiple emails, and telephone call with co-counsel re: settlement offer.
5/10/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange correspondence with defense counsel re: clarification on settlement offer.
5/11/2018	Alison M. Bernal	1.90	\$600.00	\$1,140.00	Preparation of draft stipulation extending scheduling dates; email with co-counsel re: same.

5/14/2018	Alison M. Bernal	0.70	\$600.00	\$420.00	Preparation of revisions and edits to meet and confer letter.
5/14/2018	Alison M. Bernal	1.00	\$600.00	\$600.00	Preparation of revisions and edits to responses to discovery, set two.
5/16/2018	Alison M. Bernal	3.20	\$600.00	\$1,920.00	Emails, stips, emails, proposed order.
5/17/2018	Alison M. Bernal	3.50	\$600.00	\$2,100.00	Request for Production responses, emails, emails, stip and proposed order.
5/17/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Review and analysis of Bell deposition notice.
5/23/2018	Alison M. Bernal	0.20	\$600.00	\$120.00	Review and analysis of notice of taking Bell deposition off calendar.
5/24/2018	Alison M. Bernal	0.20	\$600.00	\$120.00	Exchange correspondence with counsel re: plaintiff depositions.
5/25/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange correspondence with counsel re: plaintiff depositions.
5/29/2018	Alison M. Bernal	0.50	\$600.00	\$300.00	Exchange correspondence with defense counsel re: settlement position.
5/30/2018	Alison M. Bernal	0.40	\$600.00	\$240.00	Exchange multiple correspondence with counsel re: plaintiff depositions.
5/31/2018	Alison M. Bernal	0.50	\$600.00	\$300.00	Telephone call with co-counsel re: discovery issues.
6/1/2018	Alison M. Bernal	1.90	\$600.00	\$1,140.00	Exchange multiple emails with co-counsel re: 30b6 notice and other deposition issues.

6/6/2018	Alison M. Bernal	0.60	\$600.00	\$360.00	Exchange multiple correspondence with counsel re: plaintiff's depositions, plaintiff's responses to Request for Production. Review and analysis of defense response to meet and confer
6/8/2018	Alison M. Bernal	0.50	\$600.00	\$300.00	letter.
6/11/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange multiple correspondence with opposing counsel re: discovery.
6/12/2018	Alison M. Bernal	0.40	\$600.00	\$240.00	Exchange multiple correspondence with opposing counsel re: discovery. Telephone call with co-counsel and opposing counsel re:
6/13/2018	Alison M. Bernal	0.40	\$600.00	\$240.00	discovery.
6/14/2018	Alison M. Bernal	0.50	\$600.00	\$300.00	Exchange multiple correspondence with opposing counsel and co-counsel re: deposition.
6/18/2018	Alison M. Bernal	0.50	\$600.00	\$300.00	Exchange multiple correspondence with opposing counsel re: discovery.
6/22/2018	Alison M. Bernal	0.60	\$600.00	\$360.00	Exchange multiple correspondence with co-counsel, and conduct telephone call with co-counsel re: plaintiff's depositions.

6/25/2018	Alison M. Bernal	0.50	\$600.00	\$300.00	Exchange multiple emails with co-counsel and clients re: deposition.
6/26/2018	Alison M. Bernal	1.30	\$600.00	\$780.00	Telephone call with co-counsel, client re: deposition; multiple emails re: same.
6/26/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange correspondence with defense counsel re: info for Reilly deposition.
6/27/2018	Alison M. Bernal	5.00	\$600.00	\$3,000.00	Defend Deana Reilly deposition.
6/28/2018	Alison M. Bernal	0.50	\$600.00	\$300.00	Review and analysis of defendant's letter re: confidentiality of depositions.
7/3/2018	Alison M. Bernal	1.00	\$600.00	\$600.00	Review and analysis of defendant's documents produced with discovery.
7/5/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange multiple correspondence re: date for Schmitt deposition.
7/11/2018	Alison M. Bernal	0.20	\$600.00	\$120.00	Exchange correspondence with co-counsel re: Reilly transcript.
7/12/2018	Alison M. Bernal	0.70	\$600.00	\$420.00	Review and analysis of subpoenas and further meet and confer letter; multiple emails with damages expert and co-counsel.
7/15/2018	Alison M. Bernal	0.80	\$600.00	\$480.00	Telephone call with all counsel re: discovery issues and process for motion to compel in central district.

7/17/2018	Alison M. Bernal	1.30	\$600.00	\$780.00	Exchange multiple correspondence with co-counsel, telephone call with counsel, and review of proposed outline of discovery dispute, in preparation of call with magistrate.
7/18/2018	Alison M. Bernal	3.20	\$600.00	\$1,920.00	Revise and edit ex parte application for extension of time, and exchange email with co-counsel re: suggested. Preparation of detailed email to Judge Early re: discovery dispute; exchange
7/19/2018	Alison M. Bernal	1.90	\$600.00	\$1,140.00	correspondence with co-counsel re: same. Exchange multiple
7/22/2018	Alison M. Bernal	0.50	\$600.00	\$300.00	correspondence with co-counsel re: pre-motion conference with Judge Early. Exchange correspondence with
7/23/2018	Alison M. Bernal	0.20	\$600.00	\$120.00	defense counsel re: Schmitt deposition. Pre-discovery call with Judge
7/23/2018	Alison M. Bernal	1.30	\$600.00	\$780.00	Early; multiple telephone calls with co-counsel. Exchange multiple
7/24/2018	Alison M. Bernal	0.50	\$600.00	\$300.00	correspondence with counsel re: depositions. Exchange correspondence with
7/26/2018	Alison M. Bernal	0.60	\$600.00	\$360.00	counsel re: under seal procedure for class cert motion.

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7/27/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange correspondence with counsel re: ex parte application for continuance.
7/30/2018	Alison M. Bernal	4.30	\$600.00	\$2,580.00	Ex parte motion for stay and app to file under seal, with supporting documents, exchange email notice with defense counsel.
7/31/2018	Alison M. Bernal	2.20	\$600.00	\$1,320.00	Preparation of firm bio for class certification motion.
8/1/2018	Alison M. Bernal	5.10	\$600.00	\$3,060.00	Exchange multiple correspondence with co-counsel, and perform extensive revisions and edits to motion for class certification and supporting documents.
8/2/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange correspondence with defense counsel re: unredacted documents.
8/8/2018	Alison M. Bernal	0.40	\$600.00	\$240.00	Exchange multiple correspondence with co-counsel re: clerk's request related to ex parte application.
8/9/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange correspondence with co-counsel re: mediators.
8/10/2018	Alison M. Bernal	0.40	\$600.00	\$240.00	Exchange correspondence with defense counsel re: proposed mediators.
8/20/2018	Alison M. Bernal	0.40	\$600.00	\$240.00	Exchange multiple correspondence with co-counsel re: mediation.

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8/23/2018	Alison M. Bernal	0.70	\$600.00	\$420.00	Multiple emails re mediation, telephone call with counsel re: same.
8/24/2018	Alison M. Bernal	2.20	\$600.00	\$1,320.00	Preparation of revisions and edits to mediation brief.
8/30/2018	Alison M. Bernal	0.40	\$600.00	\$240.00	Exchange multiple emails re: mediation report.
9/4/2018	Alison M. Bernal	0.80	\$600.00	\$480.00	Telephone call with Louisiana presenter and multiple emails with counsel re: same.
9/18/2018	Alison M. Bernal	0.40	\$600.00	\$240.00	Emails with co-counsel and opposing counsel re: motion for summary judgment hearing date.
9/19/2018	Alison M. Bernal	0.90	\$600.00	\$540.00	Emails, telephone calls with co-counsel and opposing counsel re: motion for summary judgment hearing date.
9/19/2018	Alison M. Bernal	1.60	\$600.00	\$960.00	Revise and edit ex parte application.
9/20/2018	Alison M. Bernal	0.90	\$600.00	\$540.00	Exchange multiple correspondence with defense counsel re: request to move motion for summary judgment hearing.
9/20/2018	Alison M. Bernal	0.50	\$600.00	\$300.00	Exchange multiple correspondence with co-counsel re: bases to move motion for summary judgment hearing.
9/21/2018	Alison M. Bernal	1.30	\$600.00	\$780.00	Telephone calls and emails with all counsel re: stipulation to move hearing date.

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Date	Attorney Name	Hours	Rate	Amount	Description
9/24/2018	Alison M. Bernal	0.20	\$600.00	\$120.00	Emails with co-counsel re: Motion for Summary Judgment stipulation.
10/17/2018	Alison M. Bernal	1.50	\$600.00	\$900.00	Multiple emails, telephone call with counsel re: Motion for Summary Judgment hearing.
10/19/2018	Alison M. Bernal	2.10	\$600.00	\$1,260.00	Revisions and edits to Motion for Summary Judgment fact sections for opposition.
10/21/2018	Alison M. Bernal	0.80	\$600.00	\$480.00	Review and analysis of docket and exchange correspondence on scheduling issues related to potential motion to strike.
10/22/2018	Alison M. Bernal	5.80	\$600.00	\$3,480.00	Revisions and edits to Motion for Summary Judgment opposition documents.
10/23/2018	Alison M. Bernal	0.20	\$600.00	\$120.00	Exchange correspondence with co-counsel re: class cert reply.
11/5/2018	Alison M. Bernal	1.50	\$600.00	\$900.00	Revisions and edits to reply in support of motion for class certification.
11/9/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange emails re: expert depositions.
11/14/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange emails re: meeting to discuss Motion for Summary Judgment.
11/16/2018	Alison M. Bernal	0.50	\$600.00	\$300.00	Telephone call with counsel re: Motion for Summary Judgment hearing.

11/16/2018	Alison M. Bernal	0.50	\$600.00	\$300.00	Telephone call with counsel re: Motion for Summary Judgment hearing.
11/17/2018	Alison M. Bernal	1.00	\$600.00	\$600.00	Telephone call with counsel re: tentative on class certification and Motion for Summary Judgment, and review and analysis of same.
11/18/2018	Alison M. Bernal	0.60	\$600.00	\$360.00	Call with co-counsel re: strategy for Motion for Summary Judgment hearing.
11/19/2018	Alison M. Bernal	3.50	\$600.00	\$2,100.00	Prepare for and attend hearing on class certification and Motion for Summary Judgment.
11/26/2018	Alison M. Bernal	0.40	\$600.00	\$240.00	Exchange mails re: settlement demand.
11/26/2018	Alison M. Bernal	0.20	\$600.00	\$120.00	Exchange emails re: court orders on class cert and Motion for Summary Judgment.
11/28/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange emails re: Missouri complaint.
11/29/2018	Alison M. Bernal	0.40	\$600.00	\$240.00	Exchange emails re motion to quash and status of settlement proposal.
12/3/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Perform research re: mascara coding project emails for damages expert.
12/8/2018	Alison M. Bernal	5.60	\$600.00	\$3,360.00	Perform further research re: mascara coding project for damages expert.
12/11/2018	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange multiple emails re: expert depositions.

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12/16/2018	Alison M. Bernal	0.50	\$600.00	\$300.00	Exchange multiple emails with counsel and damages expert.
12/24/2018	Alison M. Bernal	0.40	\$600.00	\$240.00	Exchange emails re: trial prep.
1/2/2019	Alison M. Bernal	0.50	\$600.00	\$300.00	Exchange multiple emails re: sample trial documents.
1/7/2019	Alison M. Bernal	4.90	\$600.00	\$2,940.00	Motion for adverse inference. Exchange multiple emails re:
1/8/2019	Alison M. Bernal	0.50	\$600.00	\$300.00	16-2 conference. Exchange emails re: trial
1/9/2019	Alison M. Bernal	0.30	\$600.00	\$180.00	subpoenas. Review and analysis of final
1/10/2019	Alison M. Bernal	0.90	\$600.00	\$540.00	order on class certification. Revisions and edits to motion
1/14/2019	Alison M. Bernal	2.90	\$600.00	\$1,740.00	in limine opposition documents. Exchange emails re: jury
1/14/2019	Alison M. Bernal	0.30	\$600.00	\$180.00	instructions. Emails and call with co-
1/15/2019	Alison M. Bernal	1.50	\$600.00	\$900.00	counsel, clerk re: pretrial procedure for Judge Selna.
1/16/2019	Alison M. Bernal	0.50	\$600.00	\$300.00	Exchange emails re: PTO. Preparation of statement of
1/17/2019	Alison M. Bernal	4.90	\$600.00	\$2,940.00	the case, review of jury instructions and witness list
1/18/2019	Alison M. Bernal	3.70	\$600.00	\$2,220.00	and other pretrial documents. Further preparation of jury
1/18/2019	Alison M. Bernal	0.20	\$600.00	\$120.00	instructions and PTO, emails re same. Exchange emails re: MILs.

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1/19/2019	Alison M. Bernal	4.10	\$600.00	\$2,460.00	Further preparation of jury instructions and PTO, emails re same.
1/22/2019	Alison M. Bernal	2.40	\$600.00	\$1,440.00	Revisions and edits to Motion in Limine replies.
1/23/2019	Alison M. Bernal	2.70	\$600.00	\$1,620.00	Meet and confer conference re: trial documents, prepare for meet and confer meeting by review of court's trial order and draft trial documents.
1/25/2019	Alison M. Bernal	0.50	\$600.00	\$300.00	Review 9th circuit filing, email to co-counsel re: same.
1/28/2019	Alison M. Bernal	6.20	\$600.00	\$3,720.00	Further preparation of trial documents, per Judge Selna trial order; telephone call with co-counsel re: same.
1/29/2019	Alison M. Bernal	5.90	\$600.00	\$3,540.00	Further preparation of trial documents, per Judge Selna trial order, telephone call and multiple emails with co-counsel and defense counsel re: pretrial documents, PHV for Joe Lipari.
1/30/2019	Alison M. Bernal	0.70	\$600.00	\$420.00	Exchange emails re: class notice and trial dates, review of proposed class notice.
2/1/2019	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange emails re: pretrial conference.
2/5/2019	Alison M. Bernal	0.90	\$600.00	\$540.00	Exchange multiple emails and calls with co-counsel re: Order to Show Cause issue.

Slip Listing
#9256

2/6/2019	Alison M. Bernal	1.10	\$600.00	\$660.00	Exchange multiple emails and calls with co-counsel re: Order to Show Cause issue.
2/7/2019	Alison M. Bernal	2.00	\$600.00	\$1,200.00	Exchange multiple emails, revisions and edits re: opposition to motion to stay.
2/11/2019	Alison M. Bernal	1.80	\$600.00	\$1,080.00	Perform legal research for Order to Show Cause response, exchange emails re: same.
2/11/2019	Alison M. Bernal	0.40	\$600.00	\$240.00	Exchange multiple emails re: defense motion to stay.
2/12/2019	Alison M. Bernal	1.10	\$600.00	\$660.00	Perform legal research for Order to Show Cause response, further preparation of Order to Show Cause response, emails re: same.
2/13/2019	Alison M. Bernal	1.90	\$600.00	\$1,140.00	Further preparation of opposition to motion for stay. Exchange multiple emails and telephone calls with counsel re: status of pretrial documents, class notice and stay issues.
2/15/2019	Alison M. Bernal	2.30	\$600.00	\$1,380.00	Further preparation of revisions and edits to Order to Show Cause response and supporting documents, per court order, multiple emails re: same.
2/18/2019	Alison M. Bernal	0.60	\$600.00	\$360.00	

Slip Listing
#9257

2/20/2019	Alison M. Bernal	1.80	\$600.00	\$1,080.00	Further preparation of revisions and edits to Order to Show Cause response and supporting documents, per court order, multiple emails re: same.
2/21/2019	Alison M. Bernal	0.70	\$600.00	\$420.00	Exchange multiple emails re: 23f response and further preparation of same.
2/25/2019	Alison M. Bernal	2.30	\$600.00	\$1,380.00	Further preparation of 23f response and supporting documents and multiple emails re: same.
3/22/2019	Alison M. Bernal	1.40	\$600.00	\$840.00	Review of 9th circuit order and multiple telephone calls and emails with counsel re: same and strategy going forward.
3/25/2019	Alison M. Bernal	0.90	\$600.00	\$540.00	Exchange multiple emails with counsel re: class notice information, defendant's motion to decertify, notice issues.
3/27/2019	Alison M. Bernal	0.50	\$600.00	\$300.00	Emails, telephone calls re opposition to motion to decertify.
3/29/2019	Alison M. Bernal	0.80	\$600.00	\$480.00	Exchange multiple emails re opposition to motion to decertify and Legal research 7-3 requirements.
4/1/2019	Alison M. Bernal	2.40	\$600.00	\$1,440.00	Further preparation of opposition to motion to decertify, multiple emails re: same.

Slip Listing
9238

4/2/2019	Alison M. Bernal	0.60	\$600.00	\$360.00	Preparation of revisions and edits to amended Rule 26 report, per court order, and multiple emails re: same.
4/3/2019	Alison M. Bernal	0.40	\$600.00	\$240.00	Exchange multiple correspondence with co-counsel and defense counsel re: Rule 26 report.
4/8/2019	Alison M. Bernal	0.50	\$600.00	\$300.00	Exchange multiple correspondence with co-counsel and defense counsel re: Rule 26 report.
4/12/2019	Alison M. Bernal	0.90	\$600.00	\$540.00	Telephone call and multiple emails re: judge's order on trial setting.
4/15/2019	Alison M. Bernal	0.20	\$600.00	\$120.00	Review of Court's order continuing trial setting conference.
4/17/2019	Alison M. Bernal	0.20	\$600.00	\$120.00	Exchange correspondence with co-counsel re: mediation brief.
4/24/2019	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange emails and telephone calls with co-counsel re: Papas mediation.
4/25/2019	Alison M. Bernal	0.70	\$600.00	\$420.00	Conference call with co-counsel and multiple emails re: strategy after mediation.
4/26/2019	Alison M. Bernal	0.40	\$600.00	\$240.00	Review and analysis of tentative ruling on motion to decertify class and multiple emails re: same.
5/7/2019	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange multiple emails re: continued hearing on motion to decertify.

Slip Listing
#9239

5/9/2019	Alison M. Bernal	0.10	\$600.00	\$60.00	Review of Court order continuing hearing on motion to decertify.
5/17/2019	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange multiple emails with co-counsel re: defendant's request for further extension on decertification hearing.
5/28/2019	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange multiple emails re: continued hearing on motion to decertify.
5/31/2019	Alison M. Bernal	0.10	\$600.00	\$60.00	Review of Court order continuing decertification hearing.
6/14/2019	Alison M. Bernal	0.20	\$600.00	\$120.00	Exchange multiple emails with co-counsel re: continued hearing on motion to decertify.
7/22/2019	Alison M. Bernal	0.10	\$600.00	\$60.00	Exchange emails with co-counsel re: motion for preliminary approval.
7/25/2019	Alison M. Bernal	0.50	\$600.00	\$300.00	Preparation of revisions and edits to stipulation and proposed order continuing date for preliminary approval motion.
7/26/2019	Alison M. Bernal	0.20	\$600.00	\$120.00	Review of court's order continuing date for preliminary approval, and emails with counsel re: same.
8/8/2019	Alison M. Bernal	1.00	\$600.00	\$600.00	Preparation of stipulation and proposed order for additional pages; emails with counsel re: same.

Slip Listing
9200

8/12/2019	Alison M. Bernal	1.30	\$600.00	\$780.00	Exchange multiple emails re: preliminary approval documents; further preparation of preliminary approval documents.
8/13/2019	Alison M. Bernal	0.10	\$600.00	\$60.00	Review of court order setting approval hearing.
8/20/2019	Alison M. Bernal	0.10	\$600.00	\$60.00	Email co-counsel re: 9/16/19 hearing.
9/12/2019	Alison M. Bernal	0.20	\$600.00	\$120.00	Email co-counsel re: 9/16/19 hearing.
9/16/2019	Alison M. Bernal	0.10	\$600.00	\$60.00	Email co-counsel re: 9/16/19 hearing.
9/18/2019	Alison M. Bernal	0.10	\$600.00	\$60.00	Email co-counsel re: working with administrator.
10/1/2019	Alison M. Bernal	0.30	\$600.00	\$180.00	Exchange multiple emails with all counsel re: preliminary approval order date issue.
8/28/2018	Jonathan D. Miller	4.50	\$600.00	\$2,700.00	Attend mediation with Judge Wagner.
8/29/2018	Jonathan D. Miller	0.80	\$600.00	\$480.00	Telephone conference with counsel re: mediation.
12/27/2018	Jonathan D. Miller	1.00	\$600.00	\$600.00	Telephone conference with counsel re: trial prep.
12/28/2018	Jonathan D. Miller	0.20	\$600.00	\$120.00	Email to co-counsel re: trial guidelines.
3/25/2019	Jonathan D. Miller	0.20	\$600.00	\$120.00	Email to co-counsel re: motion to decertify.
9/28/2017	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to United Process Servers re: delivery of courtesy copies to Judge Selna re: stipulation to file First Amended Complaint.

Slip Listing
9201

9/28/2017	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to Judge Selna re: stipulation to file First Amended Complaint.
10/13/2017	Lindsey K. LeBlanc	1.20	\$175.00	\$210.00	Further preparation and review of First Amended Complaint.
10/14/2017	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to United Process Servers re: delivery of courtesy copies to Judge Selna re: First Amended Complaint and Stipulation for Protective Order.
11/14/2017	Lindsey K. LeBlanc	1.50	\$175.00	\$262.50	Further preparation of opposition to Motion to Dismiss First Amended Complaint.
12/1/2017	Lindsey K. LeBlanc	0.20	\$175.00	\$35.00	Prepare and send email to court clerk Karla Tunis re: status of Gonnelli pro hac application.
1/4/2018	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to United Process Servers re: delivery of Second Amended Complaint to judge's chambers.
1/4/2018	Lindsey K. LeBlanc	1.10	\$175.00	\$192.50	Further preparation and revisions to Second Amended Complaint.
4/27/2018	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to opposing counsel re: objections to notice of taking plaintiff depositions.

Slip Listing
9202

4/27/2018	Lindsey K. LeBlanc	0.40	\$175.00	\$70.00	Preparation of objection to notice of taking deposition of plaintiff Carol Orlowsky.
4/27/2018	Lindsey K. LeBlanc	0.40	\$175.00	\$70.00	Preparation of objection to notice of taking deposition of plaintiff Stephanie Miller Brun.
4/27/2018	Lindsey K. LeBlanc	0.40	\$175.00	\$70.00	Preparation of objection to notice of taking deposition of plaintiff Deana Reilly.
4/27/2018	Lindsey K. LeBlanc	0.40	\$175.00	\$70.00	Preparation of objection to notice of taking deposition of plaintiff Megan Schmitt.
5/17/2018	Lindsey K. LeBlanc	0.40	\$175.00	\$70.00	Further preparation and revision of responses to Request for Production, Set Two, from plaintiff Deana Reilly.
5/17/2018	Lindsey K. LeBlanc	0.40	\$175.00	\$70.00	Further preparation and revision of responses to Request for Production, Set Two, from plaintiff Megan Schmitt.
5/17/2018	Lindsey K. LeBlanc	0.40	\$175.00	\$70.00	Further preparation and revision of responses to Request for Production, Set Two, from plaintiff Carol Orlowsky.
5/17/2018	Lindsey K. LeBlanc	0.40	\$175.00	\$70.00	Further preparation and revision of responses to Request for Production, Set Two, from plaintiff Stephanie Miller Brun.

Slip Listing
#9265

5/29/2018	Lindsey K. LeBlanc	0.20	\$175.00	\$35.00	Conference with court clerk Karla Tunis re: status of stipulation to modify scheduling order.
7/19/2018	Lindsey K. LeBlanc	1.30	\$175.00	\$227.50	Further preparation and revision to ex parte application to modify scheduling order and supporting declaration of Adam Gonnelli.
7/30/2018	Lindsey K. LeBlanc	1.50	\$175.00	\$262.50	Further preparation and revisions to ex parte application to stay case and request for discovery sanctions, and supporting declaration of Adam Gonnelli.
7/30/2018	Lindsey K. LeBlanc	2.10	\$175.00	\$367.50	Preparation of application to file under seal the ex parte application to stay case and request for discovery sanctions, supporting declaration of Adam Gonnelli, proposed order, and sealed exhibits.
7/30/2018	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to United Process Servers re: delivery of sealed documents re: ex parte to stay and request for sanctions to Judge Selna.

Slip Listing
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7/31/2018	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to United Process Servers re: ex parte application to stay case and request for discovery sanctions, and supporting declaration of Adam Gonnelli to be delivered to judge's chambers.
8/1/2018	Lindsey K. LeBlanc	1.60	\$175.00	\$280.00	Further preparation and revisions to plaintiffs' motion for class certification .
8/1/2018	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to United Process Servers re: ex parte application to modify scheduling order and declaration of Adam Gonnelli to be delivered to judge's chambers.
8/1/2018	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to Judge Selna re: Plaintiffs' Application to Stay the Case, and Application to File Exhibits Under Seal.
8/2/2018	Lindsey K. LeBlanc	2.50	\$175.00	\$437.50	Preparation of application to file under seal, declaration of Adam Gonnelli, Declaration of Donald May, proposed order to seal, and sealed exhibits re: motion for class certification.

Slip Listing
#9205

8/2/2018	Lindsey K. LeBlanc	0.20	\$175.00	\$35.00	Prepare and send email to opposing counsel with unredacted, sealed documents re: motion for class certification.
8/2/2018	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to United Process Servers re: sealed documents re: motion for class certification for delivery to judge's chambers.
8/23/2018	Lindsey K. LeBlanc	0.60	\$175.00	\$105.00	Further preparation and revision to plaintiffs' mediation statement.
8/24/2018	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to Judge Wagner re: plaintiffs' mediation statement.
10/22/2018	Lindsey K. LeBlanc	2.40	\$175.00	\$420.00	Further preparation of revision of plaintiffs' opposition to motion for summary judgment, separate statement and declarations.
10/22/2018	Lindsey K. LeBlanc	1.00	\$175.00	\$175.00	Preparation of application to file under seal, supporting declaration and proposed order re: opposition to motion for summary judgment.
10/22/2018	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to opposing counsel re: unredacted documents related to opposition to motion for summary judgment.

Slip Listing
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10/23/2018	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to United Process Servers re: sealed documents re: opposition to motion for summary judgment to be delivered to Judge Selna.
11/5/2018	Lindsey K. LeBlanc	0.80	\$175.00	\$140.00	Further preparation and revisions to reply in support of motion for summary judgment.
11/5/2018	Lindsey K. LeBlanc	2.00	\$175.00	\$350.00	Prepare application to file under seal, declaration of Adam Gonnelli, and proposed order re: reply in support of motion for summary judgment.
11/5/2018	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to opposing counsel re: unredacted documents related to reply in support of motion for summary judgment.
12/7/2018	Lindsey K. LeBlanc	1.50	\$175.00	\$262.50	Further research and preparation re: mascara advertisement language to be included in Excel sheet.
1/7/2019	Lindsey K. LeBlanc	0.90	\$175.00	\$157.50	Further preparation and revisions to motion for evidentiary sanctions.
1/7/2019	Lindsey K. LeBlanc	1.80	\$175.00	\$315.00	Preparation of application to file under seal, supporting declaration, and proposed order re: motion for evidentiary sanctions.

1/7/2019	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to Judge Selna re: proposed order to motion for evidentiary sanctions.
1/14/2019	Lindsey K. LeBlanc	1.70	\$175.00	\$297.50	Preparation of application to file under seal, declaration of Adam Gonnelli, and proposed order re: reply to motion for class certification .
1/14/2019	Lindsey K. LeBlanc	1.10	\$175.00	\$192.50	Further preparation and revisions to reply to motion for class certification.
1/22/2019	Lindsey K. LeBlanc	0.50	\$175.00	\$87.50	Further preparation and revisions to reply in support of motion for evidentiary sanctions.
1/22/2019	Lindsey K. LeBlanc	1.00	\$175.00	\$175.00	Preparation of application to file under seal, declaration of Adam Gonnelli, and proposed order re: reply in support of motion for evidentiary sanctions.
1/29/2019	Lindsey K. LeBlanc	1.50	\$175.00	\$262.50	Further preparation and revisions to joint jury instructions.
1/30/2019	Lindsey K. LeBlanc	1.20	\$175.00	\$210.00	Further preparation and revisions to motion to adjourn trial date.
2/13/2019	Lindsey K. LeBlanc	0.80	\$175.00	\$140.00	Further preparation and revisions to opposition to emergency motion to stay.

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2/20/2019	Lindsey K. LeBlanc	1.40	\$175.00	\$245.00	Further preparation and revision to response to Order to Show Cause, declaration of Gonnelli, declaration of Sultzer, declaration oh Hilsee, declaration of Marcus, and declaration of Miller.
2/25/2019	Lindsey K. LeBlanc	1.80	\$175.00	\$315.00	Further preparation and revision to opposition to petition for permission to appeal.
2/25/2019	Lindsey K. LeBlanc	0.70	\$175.00	\$122.50	Preparation of motion to file under seal re: opposition to petition for permission to appeal.
4/1/2019	Lindsey K. LeBlanc	0.60	\$175.00	\$105.00	Further preparation and revision of opposition to motion to decertify class.
4/1/2019	Lindsey K. LeBlanc	0.80	\$175.00	\$140.00	Preparation of application to file under seal, declaration of Adam Gonnelli, and proposed order re: opposition to motion to decertify class.
4/1/2019	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to opposing counsel re: sealed documents related to opposition to motion to decertify class.
4/8/2019	Lindsey K. LeBlanc	1.20	\$175.00	\$210.00	Further preparation and revision to joint Rule 26 report.

Slip Listing
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7/25/2019	Lindsey K. LeBlanc	0.50	\$175.00	\$87.50	Further preparation and revision to stipulation and proposed order to extend time to file preliminary approval motion.
7/25/2019	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to United Process Servers re: court delivery of stipulation and proposed order to extend time to file preliminary approval motion.
8/12/2019	Lindsey K. LeBlanc	1.50	\$175.00	\$262.50	Further preparation and revision to motion for preliminary approval and supporting documents.
8/12/2019	Lindsey K. LeBlanc	1.00	\$175.00	\$175.00	Preparation of application to file under seal re: motion for preliminary approval.
8/12/2019	Lindsey K. LeBlanc	0.10	\$175.00	\$17.50	Prepare and send email to Judge Selna re: application to file under seal and motion for preliminary approval.
Total Fees		251.70		\$131,172.50	