

1 Bonner Walsh (*pro hac vice*)  
WALSH PLLC  
2 1561 Long Haul Road  
Grangeville, ID 83530  
3 Telephone: (541) 359-2827  
Facsimile: (866) 503-8206  
4 bonner@walshpllc.com

5 *One of Attorneys for Plaintiffs and the Proposed Class*

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

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MEGAN SCHMITT, DEANA  
REILLY, CAROL ORLOWSKY, and  
STEPHANIE MILLER BRUN,  
individually and on behalf of  
themselves and all others similarly  
situated,

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

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**DECLARATION OF BONNER  
C. WALSH IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
AWARD OF ATTORNEYS'  
FEES AND REIMBURSEMENT  
OF LITIGATION EXPENSES  
TO CLASS COUNSEL AND  
SERVICE AWARDS**

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Plaintiffs,

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v.

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YOUNIQUE, LLC,

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Defendant.

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Complaint Filed: 8/17/17

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Hearing Date:

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I, Bonner C. Walsh, declare as follows:

1. I am a member of the law firm of Walsh PLLC. I submit this declaration in support of Plaintiffs’ Motion for Award of Attorneys’ Fees and Reimbursement of Litigation Expenses to Class Counsel and Service Awards. I have personal knowledge of the matters set forth herein based upon my active supervision and participation in all material aspects of the litigation.

**A. Class Counsel Experience and Reasonableness of Fees.**

2. My firm acted as one of the Co-Lead counsel in this matter. My firm has extensive class action experience. The firm represents individuals, debtors, and small businesses in class action cases litigated in the United States. My firm has served as sole lead-counsel, as co-lead counsel, or on an executive committee in numerous class actions, including cases brought on behalf of consumers in various states. I am admitted to practice fully in the states of Idaho, Oregon, Washington, and Texas and in the following Federal Courts: U.S.D.C. for Eastern District of Texas, U.S.D.C. for Northern District of Texas, U.S.D.C. for Southern District of Texas, U.S.D.C. for Western District of Texas, U.S.D.C. for District of Oregon, U.S. Court of Federal Claims, U.S.D.C. for Western District of Washington, U.S.D.C. for Eastern District of Washington, U.S.D.C. for District of Idaho and Bankruptcy Court. I am also admitted to the following Federal Appellate Courts: U.S.C.A. for the Fifth Circuit, U.S.C.A. for the Seventh Circuit, U.S.C.A. for the Eight Circuit, U.S.C.A. for the Ninth Circuit.

3. My firm kept detailed records regarding the amount of time spent by my firm, and the lodestar calculation based on my firm’s current billing rates. The information was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm in the

1 usual course and manner of my firm,<sup>1</sup> which are produced for the court in Exhibit A to this  
2 declaration.<sup>2</sup> Time expended in preparing this application for fees and reimbursement of expenses  
3 has not been included in this request.

4 4. The hourly rates in my firm included in this matter are the same as the regular  
5 current rates charged for their services in non-contingent matters and/or which have been used  
6 most recently in the lodestar cross check accepted by courts in other class litigation.

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

9 6. As of November 1, 2018, the total number of hours expended on this litigation by  
10 my firm is 466 hours. However, this time was re-reviewed and I exercised my billing judgment  
11 to cut approximately 25% of the firm's time to remove any non-essential or duplicative work  
12 done on the case. Additionally, any time related to travel was fully eliminated. After such  
13 reductions there were 349.834 hours of essential billable work in this matter. The resulting total  
14 lodestar based on the law firm's current rates is \$227,392 when rounded down to the nearest  
15 dollar.

16 7. The time described above does not include charges for expense items. Expense  
17 items are billed separately and such charges are not duplicated in my firm's billing rates. Based  
18 upon my firm records, my firm has incurred a total of \$5,781.03 in un-reimbursed expenses in  
19 connection with the prosecution of this litigation. The expenses are categorized as follows:

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23 <sup>1</sup> When possible exact time expended is tracked. Where time keeping software is not available, time is billed in  
three-minute increments (one twentieth of an hour).

24 <sup>2</sup> These records included information concerning privileged and/or confidential attorney-client communications or  
work product and to that extent have been modified or redacted to create Exhibit A.

Expense Type	Amount
Flights and Hotels	\$4,569.17
Ground Transportation Costs (taxi, airport parking, etc.)	\$236.09
Meals	\$565.77
Filing Fees / Pro Hac Vice Costs	\$410.00
<b>Total</b>	<b>\$5,781.03</b>

8. 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.

9. I have general familiarity with the range of hourly rates typically charged by plaintiffs' class action counsel in the districts 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. Courts have recently approved my requested hourly rates in both the UFC and EOTech matters listed below<sup>3</sup>.

10. I have acquired substantial experience in class actions and other complex litigation and have obtained favorable settlements as class counsel. My firm or my previous firm have been

<sup>3</sup> Though my rate has recently increased to \$650 per hour, that is reasonable for class action attorneys with my experience level. Further, the twenty-five percent downward adjustment to my firm's time in this case described above also militates in favor of the reasonableness of my firm's lodestar.

1 certified as class counsel in at least eight consumer class actions since 2010, including: *Eatmon*  
2 *v. Palisades Collection LLC*, No. 2:08-cv-00306 (E.D. Tex. Mar. 24, 2010) (Order adopting report  
3 and recommendations to certify class and appoint class counsel); *Lantrip v. Dodeka L.L.C.*, No.  
4 2:08-cv-00476 (E.D. Tex. Sept. 15, 2011) (Order granting final approval of settlement and  
5 appointing class counsel); *Taylor v. Apex Financial Management*, No. 2:09-cv-00229-TJW (E.D.  
6 Tex. Sept. 21, 2010) (Order Granting Class Certification and appointing class counsel), *Walker*  
7 *v. Asset Acquisition Group, L.L.C.*, No. 9:10-cv-185 (E.D. Tex. Aug. 25, 2011) (Order Granting  
8 Class Certification and appointing class counsel), *Bobby Prescott and Pamela White v. Autovest,*  
9 *L.L.C.*, 2:11-cv-00219, (E.D. Tex. October 28, 2011) (Order Conditionally Certifying Class,  
10 Granting Approval and appointing class counsel), *Michael Cox, et al v. Hilco Receivables, LLC*  
11 *and Central Credit Services, Inc.*, 3:09-cv-0897, (N.D. Tex. Sept. 16, 2011) (Order Granting  
12 Preliminary Approval and appointing class counsel), *Andrew Tyler Foster, et. al, v. L-3*  
13 *Communications EOTech Inc. et. al*, No. 6:15-cv-03519-BCW (W.D. Mo. July 7, 2017) (Order  
14 Granting final approval of settlement and appointing class counsel), and *Cameron Park, et. al, v.*  
15 *Zuffa, LLC et. al*, No 2:17-cv-02282-APG-VCF (D. Nev. July 23, 2018) (Adopting proposed final  
16 approval order). I was an active Executive Committee member in *In Re: Shop-Vac Marketing*  
17 *and Sales Practices Litigation*, MDL 2380 (M.D. Pennsylvania, December 9, 2016)  
18 (Memorandum by Judge Kane in support of Final Approval). Additionally, I currently hold the  
19 sole role on the Executive Committee in *In Re Kia Engine Litigation*, No. 8:17-cv-00838-JLS-  
20 JDE (C.D. Cal. June 15, 2018) (Order Appointing Co-Lead Counsel and Executive Committee).  
21 The above actions resulted in over \$500,000,000.00 in total benefits to those classes of  
22 consumers/debtors.  
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1           11.     The instant matter required a working knowledge of basic chemistry, materials  
2 science and general science. Due to my background, I was well positioned to assist all counsel  
3 in this matter on the scientific aspects of this case. Due to the contested nature of the products  
4 and their actual ingredients, it was necessary to engage an expert to determine the chemical  
5 properties of the materials. Thus FT-IR spectroscopy was utilized to perform fiber  
6 characterization of the materials at issue in this lawsuit. The importance of understanding the  
7 principles behind this area of technology was required to adequately understand the issues here  
8 and to ensure the litigation team was using the proper expert and scientific analysis methods  
9 available. If Class Counsel had not had a technical background, and the ability to understand  
10 these issues, then many of the items of importance in this case would not have been understood  
11 and the class would not have been adequately represented.

12           12.     I have a Bachelor of Sciences in Physics from the Washington State University.  
13 Additionally, I did another year of further graduate studies in Physics prior to going to law school.  
14 Prior to law school, I did significant research concerning defects in metals as it pertained to  
15 defects and solid-state physics and gained familiarity with laboratory testing protocols. This has  
16 enabled me to liaison with experts in this litigation and to streamline many aspects regarding  
17 scientific concepts and how they apply to the litigation at hand as well as to go through various  
18 mathematical models with our experts to ensure that the conclusions we were being presented  
19 were supported by the data.

20           13.     My research has been published in *Hyperfine Interactions*, an international journal  
21 devoted to research in solid state physics, atomic physics, nuclear physics and relevant chemistry.  
22 *See* Matthew O. Zacate, Bonner C. Walsh, et al., Segregation of Solutes In Two-Phase Mixtures,  
23 Vol. 136:3, *Hyperfine Interactions*, 653-658 (2002). I also presented my research, Site  
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1 Preferences of Solutes in the Two-phase Field Between Pd<sub>3</sub>Ga<sub>7</sub> And PdGa, to the American  
2 Physics Society in March 2001.

3       14. My work in this case includes, but is not limited to: liaising with clients and many  
4 potential clients; developing the legal claims to be presented; drafting of discovery, liaising with  
5 a testifying experts; development of discovery; drafting pleadings; corresponding with counsel  
6 for Defendant; attending some key court appearances; corresponding with and handling  
7 negotiations and disputes with opposing counsel; assisting the named Plaintiffs/putative Class  
8 Representatives in gathering evidentiary materials; advising Class Representatives of settlement  
9 progress; preparing for the Rule 30(b)(6) depositions of Defendant; conducting legal research and  
10 developing Plaintiffs' claims; working with co-counsel to develop arguments related to class  
11 certification under Fed. R. Civ. P. 23; coordinating with Missouri co-counsel and defense counsel;  
12 engaging in extended settlement discussions with defense counsel; addressing disputes related to  
13 the form and methods of disseminating the settlement notice; addressing and researching disputes  
14 concerning email notice; researching present and historical claims made about the products by  
15 Defendant; data processing, coding and mathematical modeling cross checks for damages;  
16 drafting pretrial documents; working through various disputes regarding iterations of pretrial  
17 documents with Defendant; drafting motion papers and briefs submitted to the court during the  
18 settlement approval phase; working with the settlement administrator to set up the initial notice  
19 program. The foregoing is just a general summary of the work I have done on this case to date.  
20 There are other unlisted items that can be seen in the time records produced by me in this matter.  
21 I have devoted a significant amount of my time to this case since the inception of this case reach  
22 the current benefit for the class.

23       I declare under penalty of perjury that the foregoing is true and correct.  
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Executed on this 13<sup>th</sup> day of November 2019 in Grangeville, Idaho.



Bonner C. Walsh



# **EXHIBIT**

# **A**

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
8/14/2017	2.25	Review complaint prior to filing.	\$650.00	\$1,462.50	Bonner Walsh
8/16/2017	1.45	Review filed complaint and orders from court.	\$650.00	\$942.50	Bonner Walsh
8/17/2017	0.33	Exchange case emails with adam.	\$650.00	\$214.50	Bonner Walsh
8/17/2017	0.75	Review presenter agreement discuss with Adam Gonnelli.	\$650.00	\$487.50	Bonner Walsh
8/24/2017	0.23	Exchange case emails with adam.	\$650.00	\$149.50	Bonner Walsh
9/5/2017	0.13	Exchange case emails with adam.	\$650.00	\$84.50	Bonner Walsh
9/19/2017	0.45	Discuss meet and confer with Adam Gonnelli.	\$650.00	\$292.50	Bonner Walsh
10/11/2017	0.45	Emails and discussions with Adam Gonnelli re Coty defendant.	\$650.00	\$292.50	Bonner Walsh
10/13/2017	1.25	Review amended complaint, discuss with adam, ed and alison.	\$650.00	\$812.50	Bonner Walsh
10/21/2017	0.12	Follow up with Adam Gonnelli Re Meet and confer.	\$650.00	\$78.00	Bonner Walsh
10/22/2017	0.19	Follow up with Adam Gonnelli Re Meet and confer.	\$650.00	\$123.50	Bonner Walsh
10/26/2017	0.55	Plan and prepare for and attend meet and confer call with defendant.	\$650.00	\$357.50	Bonner Walsh
10/31/2017	0.33	Review and discuss follow up meet and confer emails with Adam Gonnelli.	\$650.00	\$214.50	Bonner Walsh
11/1/2017	0.25	Exchange emails re class cert brief requirments.	\$650.00	\$162.50	Bonner Walsh
11/2/2017	0.75	Exchange emails re class cert brief requirements discuss with Adam Gonnelli and defendant review draft stips.	\$650.00	\$487.50	Bonner Walsh
11/3/2017	1.45	Receipt and review motion to dismiss.	\$650.00	\$942.50	Bonner Walsh
11/4/2017	0.35	Discuss motion with Adam Gonnelli.	\$650.00	\$227.50	Bonner Walsh
11/6/2017	0.3	Review new stip and comment to team.	\$650.00	\$195.00	Bonner Walsh
11/8/2017	0.33	Prepare to file stipulation.	\$650.00	\$214.50	Bonner Walsh
11/10/2017	0.1	Review emails from defendant.	\$650.00	\$65.00	Bonner Walsh
11/12/2017	0.1	Review emails from team.	\$650.00	\$65.00	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
11/13/2017	0.1	Meet and confer email with defendant.	\$650.00	\$65.00	Bonner Walsh
11/13/2017	0.8	Review and edit response motion to dismiss.	\$650.00	\$520.00	Bonner Walsh
11/13/2017	0.25	Team discussions MTD by email.	\$650.00	\$162.50	Bonner Walsh
11/14/2017	0.22	Meet and confer emails with defendant.	\$650.00	\$143.00	Bonner Walsh
11/17/2017	1.15	Draft rule 26 report.	\$650.00	\$747.50	Bonner Walsh
11/20/2017	1.25	Review reply to motion to dismiss, research.	\$650.00	\$812.50	Bonner Walsh
11/21/2017	0.35	Finalize draft rule 26 report, circulated to defendant exchange emails.	\$650.00	\$227.50	Bonner Walsh
11/28/2017	0.3	Emails with team and defense counsel, call with Adam Gonnelli.	\$650.00	\$195.00	Bonner Walsh
11/28/2017	0.75	Exchange emails for meet and confer RE rule 26 report, prepare for call and have call.	\$650.00	\$487.50	Bonner Walsh
11/30/2017	0.35	Review and revise defendant rule 26 report.	\$650.00	\$227.50	Bonner Walsh
12/1/2017	0.35	Discuss further revisions to rule 26 motion with Adam Gonnelli and opposing counsel.	\$650.00	\$227.50	Bonner Walsh
12/1/2017	0.5	Review tentative order from court.	\$650.00	\$325.00	Bonner Walsh
12/4/2017	1.15	Make changes to rule 26 report; discussion with Adam Gonnelli re: same.	\$650.00	\$747.50	Bonner Walsh
12/6/2017	0.22	Exchange emails regarding hearing and schedule due to fires in CA.	\$650.00	\$143.00	Bonner Walsh
12/6/2017	0.25	Make plans for hearing and discuss with team.	\$650.00	\$162.50	Bonner Walsh
12/6/2017	1.75	Review draft protective order make revisions.	\$650.00	\$1,137.50	Bonner Walsh
12/20/2017	0.35	Phone call with Adam Gonnelli discussing possible other states.	\$650.00	\$227.50	Bonner Walsh
1/4/2018	0.15	Follow ups with Sascha Henry regarding initial disclosures.	\$650.00	\$97.50	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
1/4/2018	1.45	Review and revise amended complaint, discuss with Adam Gonnelli.	\$650.00	\$942.50	Bonner Walsh
1/8/2018	1.25	Draft and circluate initial disclosures.	\$650.00	\$812.50	Bonner Walsh
1/10/2018	0.75	Finalize draft 26a1 disclosures for filing.	\$650.00	\$487.50	Bonner Walsh
1/11/2018	0.33	Review defendant's initial disclosures.	\$650.00	\$214.50	Bonner Walsh
1/18/2018	0.45	Review answer.	\$650.00	\$292.50	Bonner Walsh
1/19/2018	0.1	Review notice of interested parties.	\$650.00	\$65.00	Bonner Walsh
2/8/2018	1.33	Review and revise possible document requests.	\$650.00	\$864.50	Bonner Walsh
2/21/2018	1.75	Draft/revise discovery requests.	\$650.00	\$1,137.50	Bonner Walsh
3/2/2018	0.1	Follow up with defendant regarding protective order.	\$650.00	\$65.00	Bonner Walsh
3/4/2018	0.1	Follow up with defendant regarding protective order.	\$650.00	\$65.00	Bonner Walsh
3/5/2018	0.35	Follow up with Adam Gonnelli regarding defendant's protective order.	\$650.00	\$227.50	Bonner Walsh
3/14/2018	0.75	Review defendant's discovery response.	\$650.00	\$487.50	Bonner Walsh
3/14/2018	1.65	Review and revise our discovery responses.	\$650.00	\$1,072.50	Bonner Walsh
3/22/2018	0.55	Discuss and review contacts from previous presenter.	\$650.00	\$357.50	Bonner Walsh
4/25/2018	0.45	Call with Adam Gonnelli and follow ups regarding discovery.	\$650.00	\$292.50	Bonner Walsh
4/26/2018	0.33	Review and revise objections to plaintiffs' depos.	\$650.00	\$214.50	Bonner Walsh
4/27/2018	0.4	Review objections to notices of deposition.	\$650.00	\$260.00	Bonner Walsh
4/30/2018	2.15	Draft and revise discovery responses our clients.	\$650.00	\$1,397.50	Bonner Walsh
5/2/2018	0.65	Call with Adam Gonnelli regarding discovery.	\$650.00	\$422.50	Bonner Walsh
5/8/2018	0.1	Review email from Alison Bernal re settlement offer.	\$650.00	\$65.00	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
5/8/2018	0.75	Team discussions regarding case direction and possible resolutions.	\$650.00	\$487.50	Bonner Walsh
5/14/2018	0.2	Review meet and confer letter discuss with Adam Gonnelli.	\$650.00	\$130.00	Bonner Walsh
5/16/2018	0.75	Review stip and discuss with team.	\$650.00	\$487.50	Bonner Walsh
5/17/2018	0.8	Final review RFPs to serve.	\$650.00	\$520.00	Bonner Walsh
5/18/2018	0.15	Exchange emails regarding discovery with team.	\$650.00	\$97.50	Bonner Walsh
5/21/2018	0.1	Exchange emails with Adam Gonnelli.	\$650.00	\$65.00	Bonner Walsh
5/22/2018	0.25	Call with opposing counsel and follow up emails, discuss with Adam Gonnelli.	\$650.00	\$162.50	Bonner Walsh
5/24/2018	0.35	Call with Adam Gonnelli and follow up regarding depositions and settlement.	\$650.00	\$227.50	Bonner Walsh
5/25/2018	0.33	Follow up with team regarding depositions and settlement.	\$650.00	\$214.50	Bonner Walsh
5/29/2018	0.4	Team call.	\$650.00	\$260.00	Bonner Walsh
5/29/2018	0.55	Work through 30b6 topics talk with Adam Gonnelli.	\$650.00	\$357.50	Bonner Walsh
5/30/2018	0.25	Follow ups with Adam Gonnelli re plaintiffs depos.	\$650.00	\$162.50	Bonner Walsh
6/1/2018	0.25	Further follow ups regarding plaintiffs' depos.	\$650.00	\$162.50	Bonner Walsh
6/3/2018	0.08	Emails re discovery.	\$650.00	\$52.00	Bonner Walsh
6/3/2018	0.3	Review depo notice; conference with Adam Gonnelli.	\$650.00	\$195.00	Bonner Walsh
6/6/2018	0.42	Depo follow ups with team and defendant.	\$650.00	\$273.00	Bonner Walsh
6/7/2018	0.25	Depo follow ups with team and defendant.	\$650.00	\$162.50	Bonner Walsh
7/3/2018	2.85	Discovery review and follow up with Adam Gonnelli.	\$650.00	\$1,852.50	Bonner Walsh
7/9/2018	3.35	Doc review.	\$650.00	\$2,177.50	Bonner Walsh
7/10/2018	4.15	Doc review.	\$650.00	\$2,697.50	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
7/10/2018	0.75	Emails and calls with team regarding defendant position on stipulation.	\$650.00	\$487.50	Bonner Walsh
7/12/2018	4	Doc review and further research for expert.	\$650.00	\$2,600.00	Bonner Walsh
7/12/2018	0.65	Follow up emails and calls with team regarding defendant's position on stipulation.	\$650.00	\$422.50	Bonner Walsh
7/15/2018	0.5	Call with Alison Bernal and Adam Gonnelli re: dispute over stipulation position.	\$650.00	\$325.00	Bonner Walsh
7/15/2018	1.25	Call with team re: issues to raise with court.	\$650.00	\$812.50	Bonner Walsh
7/17/2018	2	Follow ups to get discovery issue before Judge Early. Follow up with Alison Bernal and Adam Gonnelli to get items together.	\$650.00	\$1,300.00	Bonner Walsh
7/17/2018	0.75	Review dispute items, follow up with Adam Gonnelli.	\$650.00	\$487.50	Bonner Walsh
7/18/2018	1.45	Discussions and follow ups regarding motion for extension.	\$650.00	\$942.50	Bonner Walsh
7/18/2018	0.44	Emails and revision of draft motion for extension.	\$650.00	\$286.00	Bonner Walsh
7/18/2018	1.3	Follow up regarding ex parte application regarding scheduling, review Younique's position and discuss.	\$650.00	\$845.00	Bonner Walsh
7/19/2018	0.75	Finalize letter to judge early discuss with team and circulate, AB to transmit.	\$650.00	\$487.50	Bonner Walsh
7/19/2018	0.75	Review Younique opposition and discuss with Adam Gonnelli.	\$650.00	\$487.50	Bonner Walsh
7/20/2018	0.75	Follow up discussion regarding upcoming call with Judge Early.	\$650.00	\$487.50	Bonner Walsh
7/22/2018	0.5	Discussion with Adam Gonnelli and Alison Bernal regarding documents and upcoming hearing.	\$650.00	\$325.00	Bonner Walsh
7/23/2018	0.35	Discussion with expert and exchange of emails with Adam Gonnelli.	\$650.00	\$227.50	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
7/23/2018	0.45	Exchanges of emails regarding depositions. Follow up with Adam Gonnelli and opposing counsel.	\$650.00	\$292.50	Bonner Walsh
7/23/2018	0.6	Prep for and call with Judge Early.	\$650.00	\$390.00	Bonner Walsh
7/24/2018	0.25	Conference with Adam Gonnelli regarding follow up email to opposing counsel.	\$650.00	\$162.50	Bonner Walsh
7/24/2018	2.75	Doc review and sort data for use at future depositions.	\$650.00	\$1,787.50	Bonner Walsh
7/25/2018	3.5	Review of website data on Younique and further research. assemble site grabs and further info.	\$650.00	\$2,275.00	Bonner Walsh
7/26/2018	2.75	Further research of historic info from Younique websites and advertising.	\$650.00	\$1,787.50	Bonner Walsh
7/26/2018	1.25	Review efilng of sealed docs procedures and discuss with Alison Bernal.	\$650.00	\$812.50	Bonner Walsh
7/26/2018	0	Travel time to Utah depositions.	\$650.00	\$0.00	Bonner Walsh
7/27/2018	5	Prepare for and attend depositions.	\$650.00	\$3,250.00	Bonner Walsh
7/28/2018	0.65	Receipt and review roughs from depositions.	\$650.00	\$422.50	Bonner Walsh
7/28/2018	0	Return from depositions.	\$650.00	\$0.00	Bonner Walsh
7/30/2018	0.75	Calls with expert and Jason Sultzer and Adam Gonnelli.	\$650.00	\$487.50	Bonner Walsh
7/30/2018	1.75	Draft objections 30b6, research regarding notice issues.	\$650.00	\$1,137.50	Bonner Walsh
7/30/2018	1.55	Review expert report regarding nylon testing.	\$650.00	\$1,007.50	Bonner Walsh
7/30/2018	1.75	Review and revise class cert motion.	\$650.00	\$1,137.50	Bonner Walsh
7/30/2018	1.55	Review and revise motion for stay and sanctions.	\$650.00	\$1,007.50	Bonner Walsh
7/30/2018	1.12	Update information in declaration for class cert.	\$650.00	\$728.00	Bonner Walsh
7/31/2018	0.95	Cross check bates numbers claimed to be in deposition binder from depo transcript.	\$650.00	\$617.50	Bonner Walsh
7/31/2018	1.15	Further review regarding class cert motion.	\$650.00	\$747.50	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
7/31/2018	3.25	Online research regarding green tea claims, call with expert; emails to Adam Gonnelli and Cara Walsh.	\$650.00	\$2,112.50	Bonner Walsh
7/31/2018	0.33	Review expert declaration and circulate changes to Adam Gonnelli.	\$650.00	\$214.50	Bonner Walsh
7/31/2018	0.55	Review opposition to ex parte call with Adam Gonnelli.	\$650.00	\$357.50	Bonner Walsh
8/1/2018	1.45	Review of expert reports to be tendered to opposing counsel.	\$650.00	\$942.50	Bonner Walsh
8/1/2018	2.1	Reviews, revisions and suggestions to the motion for class cert through several versions.	\$650.00	\$1,365.00	Bonner Walsh
8/2/2018	0.5	Follow ups with team and opposing counsel post filing of motion for class cert regarding unredacted copies and ensuring the Court and counsel have copies as required under the rules.	\$650.00	\$325.00	Bonner Walsh
8/3/2018	0.12	Review doc 81.	\$650.00	\$78.00	Bonner Walsh
8/8/2018	0.85	Review doc 82 denying motion to stay and for sanctions discuss with Adam Gonnelli.	\$650.00	\$552.50	Bonner Walsh
8/8/2018	0.75	Review IRI response, call and discuss with Adam Gonnelli.	\$650.00	\$487.50	Bonner Walsh
8/9/2018	0.25	Review docs filed for updated ex parte application for stay and sanctions.	\$650.00	\$162.50	Bonner Walsh
8/9/2018	0.75	Review request from opposing counsel to suggest mediators follow up discussions with team.	\$650.00	\$487.50	Bonner Walsh
8/10/2018	0.33	Further discussion regarding possible mediators.	\$650.00	\$214.50	Bonner Walsh
8/10/2018	0.12	Review courts order doc 86.	\$650.00	\$78.00	Bonner Walsh
8/10/2018	0.5	Review opposition (doc 87) discuss with Adam Gonnelli.	\$650.00	\$325.00	Bonner Walsh
8/13/2018	0.12	Review emails between team and opposing counsel regarding mediation.	\$650.00	\$78.00	Bonner Walsh



Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
8/14/2018	0.55	Review doc 90 denying stay and sanctions, discuss with Adam Gonnelli.	\$650.00	\$357.50	Bonner Walsh
8/16/2018	0.25	Further internal discussion re mediators.	\$650.00	\$162.50	Bonner Walsh
8/17/2018	0.25	Talk with Adam Gonnelli regarding opposing counsel's email concerning IRI Subpoena.	\$650.00	\$162.50	Bonner Walsh
8/20/2018	0.33	Team discussion regarding availability for mediation.	\$650.00	\$214.50	Bonner Walsh
8/22/2018	0.12	Review packet from mediator for 8.28 mediation.	\$650.00	\$78.00	Bonner Walsh
8/23/2018	0.65	Call with Adam Gonnelli regarding mediation; follow up with Alison Bernal re: communications with defendant re: mediation.	\$650.00	\$422.50	Bonner Walsh
8/23/2018	0.95	Finalization of mediation dates, internal discussion on mediation strategy.	\$650.00	\$617.50	Bonner Walsh
8/24/2018	0.3	Final review of mediation brief.	\$650.00	\$195.00	Bonner Walsh
8/24/2018	0.35	Further review of mediation statement.	\$650.00	\$227.50	Bonner Walsh
8/24/2018	0.75	Initial review of mediation statement.	\$650.00	\$487.50	Bonner Walsh
8/27/2018	0	Travel to mediation.	\$650.00	\$0.00	Bonner Walsh
8/28/2018	6.5	Plan for and attend mediation.	\$650.00	\$4,225.00	Bonner Walsh
8/29/2018	1.5	Research and review Comcast issue raised by defendant.	\$650.00	\$975.00	Bonner Walsh
8/29/2018	0	Return travels from mediation.	\$650.00	\$0.00	Bonner Walsh
8/30/2018	0.33	Proposed revisions to joint report.	\$650.00	\$214.50	Bonner Walsh
8/30/2018	1.15	Review mediation report, conference with Adam Gonnelli.	\$650.00	\$747.50	Bonner Walsh
9/7/2018	0.25	Follow up with opposing counsel regarding possible meeting on monday.	\$650.00	\$162.50	Bonner Walsh
9/10/2018	1.45	Discussion with opposing counsel regarding summary judgment, review follow up email, research and discuss.	\$650.00	\$942.50	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
9/12/2018	0.5	Further follow up with opposing counsel.	\$650.00	\$325.00	Bonner Walsh
9/17/2018	1.45	Further discussion with opposing counsel and team regarding motion for summary judgment.	\$650.00	\$942.50	Bonner Walsh
9/17/2018	0.75	Initial review MSJ from defendant.	\$650.00	\$487.50	Bonner Walsh
9/18/2018	0.4	Conference on our own ex parte motion regarding upcoming hearings.	\$650.00	\$260.00	Bonner Walsh
9/18/2018	0.75	Discussion regarding local rules and requested hearing dates.	\$650.00	\$487.50	Bonner Walsh
9/18/2018	0.55	Further discussion re: scheduling issues.	\$650.00	\$357.50	Bonner Walsh
9/18/2018	1.25	Further review and research MSJ.	\$650.00	\$812.50	Bonner Walsh
9/18/2018	0.4	Review draft opp to ex parte and revise.	\$650.00	\$260.00	Bonner Walsh
9/18/2018	0.33	Review Defendant's ex parte application.	\$650.00	\$214.50	Bonner Walsh
9/19/2018	0.35	Review order (doc 99) that moots our ex parte response but gives us an extra week to respond, discuss with Adam Gonnelli.	\$650.00	\$227.50	Bonner Walsh
9/19/2018	0.5	Team follow ups regarding coordination due to mass unavailability on the proffered date (which would have been covered in our reply).	\$650.00	\$325.00	Bonner Walsh
9/20/2018	0.55	Multiple follow ups with co-counsel re: scheduling.	\$650.00	\$357.50	Bonner Walsh
9/24/2018	0.75	Follow ups and review stip regarding hearing dates and briefing schedule.	\$650.00	\$487.50	Bonner Walsh
9/25/2018	0.5	Final review of stip, discuss with Adam Gonnelli and circulate.	\$650.00	\$325.00	Bonner Walsh
10/5/2018	0.75	Review erratta sheet compare with depo testimony, discuss with Adam Gonnelli.	\$650.00	\$487.50	Bonner Walsh
10/17/2018	2.25	Team discussions and follow up research for MSJ, exchange initial drafting.	\$650.00	\$1,462.50	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
10/18/2018	1.25	Further research MSJ motion, follow up with Adam Gonnelli.	\$650.00	\$812.50	Bonner Walsh
10/20/2018	1.5	Initial review and revisions of MSJ response.	\$650.00	\$975.00	Bonner Walsh
10/21/2018	1.25	Further review and revise MSJ.	\$650.00	\$812.50	Bonner Walsh
10/22/2018	0.55	Final edits to MSJ.	\$650.00	\$357.50	Bonner Walsh
10/22/2018	1.35	Finalize counterstatements.	\$650.00	\$877.50	Bonner Walsh
10/22/2018	0.45	Team call re filings.	\$650.00	\$292.50	Bonner Walsh
10/23/2018	2.15	Review opp to class cert and do research on defendant's claims.	\$650.00	\$1,397.50	Bonner Walsh
10/23/2018	1.05	Review rebuttal expert report served yesterday.	\$650.00	\$682.50	Bonner Walsh
10/25/2018	1.25	Further review of opposition to class cert.	\$650.00	\$812.50	Bonner Walsh
11/4/2018	1.25	Call with Adam Gonnelli re: further work to finalize reply.	\$650.00	\$812.50	Bonner Walsh
11/4/2018	1.25	Review and revise reply ISO class cert.	\$650.00	\$812.50	Bonner Walsh
11/5/2018	0.65	Finalize reply.	\$650.00	\$422.50	Bonner Walsh
11/6/2018	1.25	Review msj reply and research.	\$650.00	\$812.50	Bonner Walsh
11/8/2018	0.55	Discussion with team regarding defendant's request for further depositions.	\$650.00	\$357.50	Bonner Walsh
11/12/2018	1.15	Review and save doc 125, discuss with Adam Gonnelli.	\$650.00	\$747.50	Bonner Walsh
11/12/2018	0.85	Review and save to file docs 123 and 124, discuss with Adam Gonnelli.	\$650.00	\$552.50	Bonner Walsh
11/14/2018	1.45	Plan and prepare for team call and have call.	\$650.00	\$942.50	Bonner Walsh
11/14/2018	0.25	Team discussion regarding upcoming conference and expert depositions.	\$650.00	\$162.50	Bonner Walsh
11/16/2018	1.85	Review tentatives that were posted, minor research follow up.	\$650.00	\$1,202.50	Bonner Walsh
11/18/2018	0.5	Discussion with Adam Gonnelli then follow up email for expert depositions.	\$650.00	\$325.00	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
11/18/2018	2.25	Plan for and prepare for class cert and MSJ.	\$650.00	\$1,462.50	Bonner Walsh
11/19/2018	4	Further Planning and attendence of MSJ and Class cert hearing.	\$650.00	\$2,600.00	Bonner Walsh
11/26/2018	1.35	Review file to formulate demand, discuss with Adam Gonnelli.	\$650.00	\$877.50	Bonner Walsh
11/27/2018	1.5	Discuss with Adam Gonnelli Washington potential case, and Missouri case. Review answer in Missouri.	\$650.00	\$975.00	Bonner Walsh
11/28/2018	0.5	Follow ups with team and opposing counsel regarding expert depositions.	\$650.00	\$325.00	Bonner Walsh
11/28/2018	0.25	Review Massachusetts demand letter sent to Younique.	\$650.00	\$162.50	Bonner Walsh
11/29/2018	0.5	Follow up with defendant and experts regarding additional proposed dates for depositions.	\$650.00	\$325.00	Bonner Walsh
11/30/2018	0.25	Further follow up with Sasha Henry regarding expert depos.	\$650.00	\$162.50	Bonner Walsh
11/30/2018	1.15	Plan for and attend team call regarding pretrial matter.	\$650.00	\$747.50	Bonner Walsh
11/30/2018	0.5	Review Younique sales figures again and send to Adam Gonnelli.	\$650.00	\$325.00	Bonner Walsh
12/3/2018	2.25	Follow up with economist and Adam Gonnelli regarding sales data, begin initial analysis.	\$650.00	\$1,462.50	Bonner Walsh
12/3/2018	0.75	Review depo notice and work on objections.	\$650.00	\$487.50	Bonner Walsh
12/5/2018	3	Coding for damages analysis.	\$650.00	\$1,950.00	Bonner Walsh
12/5/2018	4.25	Coding of data for expert.	\$650.00	\$2,762.50	Bonner Walsh
12/5/2018	2.25	Prepare for and attend call with Don May and Adam Gonnelli re: coding.	\$650.00	\$1,462.50	Bonner Walsh
12/6/2018	5.25	Coding and multiple consultations with expert by phone and emails.	\$650.00	\$3,412.50	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
12/7/2018	5.55	Coding and multiple consultations with expert by emails.	\$650.00	\$3,607.50	Bonner Walsh
12/8/2018	6	Work through final coding and follow ups with team and economist.	\$650.00	\$3,900.00	Bonner Walsh
12/9/2018	5.25	Finalization of coding and circulate to expert.	\$650.00	\$3,412.50	Bonner Walsh
12/10/2018	1.15	Finalize objections to May notice and circulate to team.	\$650.00	\$747.50	Bonner Walsh
12/12/2018	0.75	Receipt and review final expert report.	\$650.00	\$487.50	Bonner Walsh
12/13/2018	0.75	Review docs produced to us by McFadden in anticipation of depositions.	\$650.00	\$487.50	Bonner Walsh
12/17/2018	0.56	Work with team to assemble docs for production at MCFadden depo.	\$650.00	\$364.00	Bonner Walsh
12/19/2018	0.25	Work with opposing counsel to try and schedule a meet and confer.	\$650.00	\$162.50	Bonner Walsh
12/21/2018	0.75	Review doc 136 order.	\$650.00	\$487.50	Bonner Walsh
12/24/2018	0.85	Work with team to set up Wednesday call and do prep for call.	\$650.00	\$552.50	Bonner Walsh
12/27/2018	0.35	Team call.	\$650.00	\$227.50	Bonner Walsh
12/28/2018	0.33	Call with Adam Gonnelli and follow up emails on general case strategy.	\$650.00	\$214.50	Bonner Walsh
12/28/2018	0.45	Final review Missouri case RFPs.	\$650.00	\$292.50	Bonner Walsh
12/29/2018	2	Review May depo transcript.	\$650.00	\$1,300.00	Bonner Walsh
12/29/2018	0.65	Revisions to rogs and circulate to Adam Gonnelli.	\$650.00	\$422.50	Bonner Walsh
12/30/2018	0.5	Review Younique response to demand, discuss with Adam Gonnelli.	\$650.00	\$325.00	Bonner Walsh
12/31/2018	1.25	Review McFadden deposition.	\$650.00	\$812.50	Bonner Walsh
1/2/2019	1.25	Review rule 37 motion from Alison Bernal; discuss additional motion with Adam Gonnelli.	\$650.00	\$812.50	Bonner Walsh
1/3/2019	0.75	Review and revise negative inference motion circulate to team.	\$650.00	\$487.50	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
1/6/2019	0.5	Near final review of negative inference motion; circulate to team.	\$650.00	\$325.00	Bonner Walsh
1/7/2019	1.25	Finalizations of motions and team follow ups prefiling.	\$650.00	\$812.50	Bonner Walsh
1/8/2019	0.65	Follow up with local counsel regarding scheduling and setting in person meeting with defense counsel for pretrial.	\$650.00	\$422.50	Bonner Walsh
1/8/2019	2.15	Review defendant's filing regarding our experts filed 1.7 followup research.	\$650.00	\$1,397.50	Bonner Walsh
1/9/2019	0.2	Follow up regarding conference.	\$650.00	\$130.00	Bonner Walsh
1/10/2019	0.25	Discussion with Adam Gonnelli regarding settlement negotiation strategy.	\$650.00	\$162.50	Bonner Walsh
1/10/2019	0.12	Follow up regarding pretrial meeting with defendant.	\$650.00	\$78.00	Bonner Walsh
1/10/2019	1.25	Review defendant's filing regarding our experts, follow up with team, do research.	\$650.00	\$812.50	Bonner Walsh
1/11/2019	0.5	Research for brief opposing striking of experts, circulate info to Jeremy Francis.	\$650.00	\$325.00	Bonner Walsh
1/11/2019	0.33	Work to finalize meeting time with defendant for pretrial.	\$650.00	\$214.50	Bonner Walsh
1/12/2019	1.25	Review and revise May Daubert opposition, team discussion with May.	\$650.00	\$812.50	Bonner Walsh
1/12/2019	2	Review motion and circulate to team.	\$650.00	\$1,300.00	Bonner Walsh
1/14/2019	0.75	Final review opposition to exclude May.	\$650.00	\$487.50	Bonner Walsh
1/14/2019	0.75	Final review opposition to exclude McFadden.	\$650.00	\$487.50	Bonner Walsh
1/14/2019	1	Review class notice and circulate comments.	\$650.00	\$650.00	Bonner Walsh
1/14/2019	2	Review filing from defendant Docs 150-153, research MIL issue.	\$650.00	\$1,300.00	Bonner Walsh
1/15/2019	1.25	Initial review and revisions to Joint exhibit list provided by defendant.	\$650.00	\$812.50	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
1/15/2019	0.65	Plan for and attend team call.	\$650.00	\$422.50	Bonner Walsh
1/15/2019	1.15	Team call regarding trial, consult regarding trial counsel.	\$650.00	\$747.50	Bonner Walsh
1/16/2019	0.75	Further review and revise to trial exhibit list.	\$650.00	\$487.50	Bonner Walsh
1/16/2019	1.65	Review and revise proposed class notice discuss with Adam Gonnelli.	\$650.00	\$1,072.50	Bonner Walsh
1/17/2019	1.35	Work on jury instructions circulate edits.	\$650.00	\$877.50	Bonner Walsh
1/17/2019	2.25	Work on PTO circulate edits.	\$650.00	\$1,462.50	Bonner Walsh
1/17/2019	0.75	Work on statement of the case circulate edits.	\$650.00	\$487.50	Bonner Walsh
1/18/2019	4.15	Review and revise jury instructions circulate to team.	\$650.00	\$2,697.50	Bonner Walsh
1/18/2019	1.15	Review opposition filed by defendant.	\$650.00	\$747.50	Bonner Walsh
1/19/2019	0.5	Full review reply motion to exclude.	\$650.00	\$325.00	Bonner Walsh
1/19/2019	1.25	Work to finalize jury instructions.	\$650.00	\$812.50	Bonner Walsh
1/20/2019	1	Work to finalize PTO.	\$650.00	\$650.00	Bonner Walsh
1/21/2019	0.12	Work with CW to get defendant docs downloaded.	\$650.00	\$78.00	Bonner Walsh
1/22/2019	0.85	Review draft reply MIL.	\$650.00	\$552.50	Bonner Walsh
1/22/2019	2	Travel for meet and confer in LA.	\$650.00	\$1,300.00	Bonner Walsh
1/23/2019	0.9	Attend meet and confer, follow up with team.	\$650.00	\$585.00	Bonner Walsh
1/23/2019	2.5	Plan and prepare for meet and confer.	\$650.00	\$1,625.00	Bonner Walsh
1/23/2019	0.85	Review email from opposing counsel follow up with Adam Gonnelli.	\$650.00	\$552.50	Bonner Walsh
1/24/2019	1.15	Review and revise updated exhibit list and PTO.	\$650.00	\$747.50	Bonner Walsh
1/25/2019	2.25	Review appeal items that came out of the blue from defendant, research, discuss with team.	\$650.00	\$1,462.50	Bonner Walsh
1/25/2019	1.06	Review opposing counsel email RE proposed affirmative defenses etc., draft reply and circulate	\$650.00	\$689.00	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
1/25/2019	0	Travel back for meet and confer in LA.	\$650.00	\$0.00	Bonner Walsh
1/25/2019	0.4	Work on email to opposing counsel regarding case conduct, purposeful omissions and general gamesmanship.	\$650.00	\$260.00	Bonner Walsh
1/27/2019	0.65	Review call agenda for tomorrow, prepare for call.	\$650.00	\$422.50	Bonner Walsh
1/28/2019	1	Discuss all pretrial docs and exchange thoughts on next steps prior to trial.	\$650.00	\$650.00	Bonner Walsh
1/28/2019	0.7	Further follow ups with team and opposing counsel regarding docs to be filed.	\$650.00	\$455.00	Bonner Walsh
1/28/2019	2	Plan for and attend team call.	\$650.00	\$1,300.00	Bonner Walsh
1/28/2019	0.3	Review deposition highlights provided by Sheppard Mullin.	\$650.00	\$195.00	Bonner Walsh
1/28/2019	1.75	Review motion to send class notice of class certification and review notice to ensure final.	\$650.00	\$1,137.50	Bonner Walsh
1/28/2019	0.6	Review pretrial docs sent internally to ensure Jeremy Francis has all the final versions.	\$650.00	\$390.00	Bonner Walsh
1/28/2019	0.45	Review trial subpoenas and suggest revisions.	\$650.00	\$292.50	Bonner Walsh
1/28/2019	0.8	Review updated docs sent by defendant.	\$650.00	\$520.00	Bonner Walsh
1/28/2019	0.82	Team discussion regarding phone call to finalize docs.	\$650.00	\$533.00	Bonner Walsh
1/29/2019	0.33	Follow ups with mediator and Adam Gonnelli following offer inquiry from Defendant.	\$650.00	\$214.50	Bonner Walsh
1/29/2019	6.25	Further work on all docs to be filed in pre trial filings, with opposing counsel and with team.	\$650.00	\$4,062.50	Bonner Walsh
1/29/2019	0.25	Review trial witness list.	\$650.00	\$162.50	Bonner Walsh



Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
1/30/2019	0.33	Review Doc. 184, discuss with Adam Gonnelli.	\$650.00	\$214.50	Bonner Walsh
1/30/2019	0.45	Review of Doc 57 to see what deadlines we must address because of rejection of jury instructions, team followups.	\$650.00	\$292.50	Bonner Walsh
1/30/2019	2.15	Review of notice, and motion to send notice and continue trial follow ups with Adam Gonnelli.	\$650.00	\$1,397.50	Bonner Walsh
1/31/2019	0.35	Review orders vacating pretrial conference, work with Jeremy Francis on trial exhibits.	\$650.00	\$227.50	Bonner Walsh
2/5/2019	1.45	Review show cause order and follow up with team.	\$650.00	\$942.50	Bonner Walsh
2/6/2019	0.25	Call with opposing counsel regarding a motion they will be filing a postponement on notice.	\$650.00	\$162.50	Bonner Walsh
2/6/2019	0.3	Follow ups regarding mediator and continued settlement negotiations.	\$650.00	\$195.00	Bonner Walsh
2/6/2019	0.4	Plan and prepare and attend call with Tom Hershewe regarding being expert on notice.	\$650.00	\$260.00	Bonner Walsh
2/6/2019	0.75	Review filings; brief research into claims.	\$650.00	\$487.50	Bonner Walsh
2/6/2019	4.05	Research regarding show cause, discuss with Adam Gonnelli getting AM and TH as experts to address notice requirements under the rules and typical procedure.	\$650.00	\$2,632.50	Bonner Walsh
2/7/2019	1.25	Work on opposition to delay enforcement of order.	\$650.00	\$812.50	Bonner Walsh
2/8/2019	0.12	Brief follow up with economic expert.	\$650.00	\$78.00	Bonner Walsh
2/11/2019	0.75	Review 9th circuit filings by opposing counsel.	\$650.00	\$487.50	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
2/11/2019	0.55	Review email from opposing counsel seeking stay; discuss with team.	\$650.00	\$357.50	Bonner Walsh
2/11/2019	0.65	Review Hilsee declaration, discuss Adam Gonnelli.	\$650.00	\$422.50	Bonner Walsh
2/12/2019	0.25	Review 9th circuit order re: reply due by tomorrow; discuss with Adam Gonnelli.	\$650.00	\$162.50	Bonner Walsh
2/12/2019	2.05	Review and revise draft of opposition to stay.	\$650.00	\$1,332.50	Bonner Walsh
2/13/2019	0.75	Discuss filing issues with local counsel; final review of docs and file.	\$650.00	\$487.50	Bonner Walsh
2/13/2019	0.65	Further review and revise draft of opposition to stay.	\$650.00	\$422.50	Bonner Walsh
2/14/2019	0.55	Review defendant's 9th circuit reply, team follow up.	\$650.00	\$357.50	Bonner Walsh
2/15/2019	1.85	Prepare for and attend team call regarding show cause.	\$650.00	\$1,202.50	Bonner Walsh
2/15/2019	0.35	Review grant of emergency stay by Ninth Circuit.	\$650.00	\$227.50	Bonner Walsh
2/18/2019	0.35	Review emails regarding missing exhibits.	\$650.00	\$227.50	Bonner Walsh
2/19/2019	0.25	Review emails from Court on 9th Circuit filings, follow up with team.	\$650.00	\$162.50	Bonner Walsh
2/20/2019	1.75	Review final response order to show cause prior to filing.	\$650.00	\$1,137.50	Bonner Walsh
2/21/2019	0.75	Review response 23(f) petition, make revisions circulate.	\$650.00	\$487.50	Bonner Walsh
2/22/2019	0.65	Final review response 23(f) petition, draft revisions and circulate.	\$650.00	\$422.50	Bonner Walsh
2/23/2019	0.35	Review Michael Liskow revisions to response 23(f) petition.	\$650.00	\$227.50	Bonner Walsh
2/25/2019	1.15	Follow ups with team pre-filing response to 9th circuit today.	\$650.00	\$747.50	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
2/26/2019	0.45	Team discussions regarding filing deficiencies.	\$650.00	\$292.50	Bonner Walsh
2/27/2019	0.65	Review objections to response order to show cause follow up with Adam Gonnelli.	\$650.00	\$422.50	Bonner Walsh
3/5/2019	0.65	Review discovery response for Missouri matter.	\$650.00	\$422.50	Bonner Walsh
3/20/2019	0.6	Discuss motion with team divy up response duties.	\$650.00	\$390.00	Bonner Walsh
3/22/2019	0.75	Call with Tom Hershewe in Missouri regarding schedule and discovery.	\$650.00	\$487.50	Bonner Walsh
3/22/2019	0.65	Review and revise RFAs for Missouri matter.	\$650.00	\$422.50	Bonner Walsh
3/22/2019	0.45	Review Courts order accelerating key dates; follow up with local for emails to opposing counsel.	\$650.00	\$292.50	Bonner Walsh
3/22/2019	0.9	Review denial of petition for review, follow up with Adam Gonnelli on case strategy.	\$650.00	\$585.00	Bonner Walsh
3/25/2019	1.35	Prepare for and attend call with opposing counsel regarding filing motion to decertify, potential resolution; discuss same with team.	\$650.00	\$877.50	Bonner Walsh
3/25/2019	1.75	Receipt and review opposing counsel motion to decertify, research local rules re: notice requirement.	\$650.00	\$1,137.50	Bonner Walsh
3/25/2019	0.65	Receipt and review opposing counsel response to our response show cause motion.	\$650.00	\$422.50	Bonner Walsh
3/27/2019	0.45	Follow up with May re declaration for response after initial review earlier.	\$650.00	\$292.50	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
3/27/2019	2.15	Prepare for and attend team call regarding decertification motion.	\$650.00	\$1,397.50	Bonner Walsh
3/27/2019	0.55	Review order discharging order to show cause; call to Adam Gonnelli re: same.	\$650.00	\$357.50	Bonner Walsh
3/27/2019	0.75	Review May declaration for response decertification, follow up with team.	\$650.00	\$487.50	Bonner Walsh
3/28/2019	2.25	Review final forms of declarations, and review motion response.	\$650.00	\$1,462.50	Bonner Walsh
3/29/2019	0.5	Follow ups with notice provider.	\$650.00	\$325.00	Bonner Walsh
3/30/2019	0.5	Review of may declaration, and circulate comments to team.	\$650.00	\$325.00	Bonner Walsh
3/30/2019	0.65	Work through May declaration by email with team.	\$650.00	\$422.50	Bonner Walsh
3/31/2019	2.25	Review of response to motion to decertify, comment and circulate.	\$650.00	\$1,462.50	Bonner Walsh
3/31/2019	0.65	Work to finalize response.	\$650.00	\$422.50	Bonner Walsh
4/1/2019	1.45	Draft proposed rule 26 report, circulate to team.	\$650.00	\$942.50	Bonner Walsh
4/1/2019	1	Final review of opposition to file.	\$650.00	\$650.00	Bonner Walsh
4/1/2019	0.5	Work to finalize response.	\$650.00	\$325.00	Bonner Walsh
4/3/2019	0.75	Finalize rule 26 to circulate.	\$650.00	\$487.50	Bonner Walsh
4/4/2019	0.65	Review response to Missouri discovery requests.	\$650.00	\$422.50	Bonner Walsh
4/4/2019	1.15	Talk with Adam Gonnelli and Tom Hershewe re Younique discovery; review discovery responses.	\$650.00	\$747.50	Bonner Walsh
4/8/2019	0.85	Review revise rule 26, and coordinate with opposing counsel and local to coordinate filing.	\$650.00	\$552.50	Bonner Walsh
4/8/2019	2.55	Work with team and opposing counsel to get final version of joint rule 26(f).	\$650.00	\$1,657.50	Bonner Walsh
4/9/2019	0.55	Review filings made in Younique by opposing counsel.	\$650.00	\$357.50	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
4/16/2019	0.15	Follow up regarding extension in Missouri action.	\$650.00	\$97.50	Bonner Walsh
4/18/2019	0.65	Review mediation statement circulate to Adam Gonnelli.	\$650.00	\$422.50	Bonner Walsh
4/19/2019	0.75	Review defendant's mediation brief, follow up Adam Gonnelli.	\$650.00	\$487.50	Bonner Walsh
4/22/2019	1.75	Data analysis on damages, follow up with Adam Gonnelli.	\$650.00	\$1,137.50	Bonner Walsh
4/22/2019	0.3	Follow up with notice group.	\$650.00	\$195.00	Bonner Walsh
4/23/2019	0.2	Various follow ups with cocounsel over the course of mediation.	\$650.00	\$130.00	Bonner Walsh
4/25/2019	0.8	Plan and prepare for team call and attend.	\$650.00	\$520.00	Bonner Walsh
4/26/2019	1.15	Review tentative on motion to decertify and follow up with opposing counsel, and team.	\$650.00	\$747.50	Bonner Walsh
5/8/2019	1.15	Review and revise proposed protective order Missouri matter.	\$650.00	\$747.50	Bonner Walsh
5/15/2019	1.149	Receipt and review responses to discovery from defendant, as well as first requests to Missouri plaintiff.	\$650.00	\$746.85	Bonner Walsh
5/31/2019	0.5	Follow ups with Adam Gonnelli regarding resolution of resolution of case.	\$650.00	\$325.00	Bonner Walsh
6/19/2019	0.35	Follow up with Missouri counsel regarding settings now that we are resolved, working to get all off calendar.	\$650.00	\$227.50	Bonner Walsh
8/12/2019	1.45	Final review preliminary approval brief.	\$650.00	\$942.50	Bonner Walsh
8/12/2019	1.25	Review settlement agreement and sign off.	\$650.00	\$812.50	Bonner Walsh
8/29/2019	0.15	Brief follow up with economist re: end of his role in case.	\$650.00	\$97.50	Bonner Walsh
9/11/2019	2.255	Review preliminary approval and do brief research, talk with team.	\$650.00	\$1,465.75	Bonner Walsh
10/15/2019	0.25	Follow up with outside attorney regarding contact by class member.	\$650.00	\$162.50	Bonner Walsh

Date	Hours	Description	Rate (\$)	Billable (\$)	Time Keeper
10/15/2019	1.15	Review final form of administrator docs, revisions made to long form and postcard notice. Circulate to team.	\$650.00	\$747.50	Bonner Walsh
10/15/2019	0.45	Revisions to long form notice, claims form and postcard notice and circulate.	\$650.00	\$292.50	Bonner Walsh
	349.834		<b>Total Lodestar</b>	<b>\$227,392.10</b>	