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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

**JESSICA GESSELE, ASHLEY ORTIZ,  
NICOLE GESSELE, TRICIA TETRAULT,**  
and **CHRISTINA MAULDIN**, both on  
behalf of themselves individually and, in  
addition, on behalf of the other similarly  
situated employees,

Plaintiffs,

vs.

**JACK IN THE BOX INC.,**  
Defendant.

Case No. 3:14-cv-01092-HZ

**Supplemental Declaration of Jon  
M. Egan**

I, Jon M. Egan, do hereby declare and say:

1. I am the attorney for plaintiffs in this action and its previous iterations, US District Court case number 3:10-cv-960-BR, Multnomah County case number 14CV06380, and Ninth Circuit case numbers 15-35262 and 20-80096. I have personal knowledge

of all of the facts herein and am competent to testify thereto. I submit this supplemental declaration per the Court's direction in Dkt. 457.

2. Below is a breakdown by year of the routine emails for which I billed only 0.05 hours (previously totaled in paragraph 12 of Dkt. 446).

<b>Email correspondent</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>Total</b>
Class administrator	0	0	42	20	11	0	11	3	189	7	0	0	10	4	<b>297</b>
Client/class member	11	21	58	41	18	95	54	28	64	31	10	20	155	7	<b>613</b>
Co-counsel	0	0	3	7	8	4	8	1	1	1	7	170	1,004	223	<b>1,437</b>
Court	0	33	57	68	37	31	38	26	30	11	12	21	93	19	<b>476</b>
Court reporter	0	0	81	25	7	25	37	0	3	0	5	5	48	0	<b>236</b>
Jennifer Murphy	0	0	0	0	0	0	0	0	0	0	0	0	208	1	<b>209</b>
Jury consultant	0	0	0	0	0	0	0	0	0	0	0	0	29	2	<b>31</b>
Kesten team	0	0	0	0	0	0	0	0	0	0	0	31	225	3	<b>259</b>
Legal research	13	3	62	28	59	34	5	3	5	9	3	8	28	4	<b>264</b>
Mediator	0	0	0	0	0	0	0	0	1	8	38	3	0	0	<b>50</b>
Opposing counsel	1	92	186	106	68	286	219	78	147	99	66	39	292	48	<b>1,727</b>
Witnesses/subpoena recipients	0	18	88	3	3	41	8	0	0	0	0	1	0	0	<b>162</b>
<b>Total</b>	<b>25</b>	<b>167</b>	<b>577</b>	<b>298</b>	<b>211</b>	<b>516</b>	<b>380</b>	<b>139</b>	<b>440</b>	<b>166</b>	<b>141</b>	<b>298</b>	<b>2,092</b>	<b>311</b>	<b>5,761</b>

3. In addition to those minor or routine emails, I spent 75.5 hours worth of more substantial amounts of time associated with the following emails (previously listed alphabetically in paragraph 13 of Dkt. 446, presented here in date order):

<b>Date</b>	<b>Item</b>	<b>Hrs</b>
8/31/2010	Emails to NV, IL, NC, HI re foia	0.4
9/1/2010	Review email from North Carolina department of labor and closed complaints against Jack in the Box	0.8
1/10/2011	Emails with opposing counsel and Jack in the Box in-house counsel re documentation needed for Rule 4 reimbursement	0.2
1/26/2011	Prepare email to opposing counsel re 26(f) notes, written Rule 16 report, magistrate consents, pretrial dates, order of consideration/phasing of the case, ADR, Rule 4 costs	0.4
1/31/2011	Emails with opposing counsel re 26(f) notes	0.3
2/14/2011	Review correspondence from Shoes for Crews and attached documents	0.2
3/30/2011	Email to SFC with details on why production is deficient	0.8

<b>Date</b>	<b>Item</b>	<b>Hrs</b>
6/1/2011	Prepare email to Jennifer Nelson re	0.7
6/14/2011	Exchange emails with Christie Laird re	0.8
6/16/2011	Prepare email to Douglas Parker re	1.2
7/3/2011	Prepare email to Jennifer Nelson re	0.4
12/28/2011	Review email from Joanna Aufmuth of opposing counsel and attached documents	0.4
2/2/2012	Review email from Cheryl Grace and attached depo rough drafts	1.4
2/3/2012	Review email from Cheryl Grace and attached depo rough drafts	1.5
2/6/2012	Review email from Dylan Smith re transcripts of Basham and Layfield, review transcripts	0.9
2/6/2012	Review email from Cheryl Grace and attached depo rough drafts	1.3
2/7/2012	Review email from Cheryl Grace and attached depo rough drafts	1.8
2/8/2012	Review email from Leo Kneibel and attached rough depo transcripts	0.6
2/9/2012	Review email from Leo Kneibel and attached rough depo transcripts	0.8
2/10/2012	Review email from Leo Kneibel and attached rough depo transcripts	1.3
2/11/2012	Review email from Leo Kneibel and attached rough depo transcripts	0.7
2/11/2012	Review email from Leo Kneibel and attached rough depo transcripts	0.4
2/13/2012	Review email from Dylan Smith re transcript of Tennant, review transcript	0.8
2/16/2012	Exchange emails with Erik Kingaard of Mower, Carreon & Desai re previous depositions of JITB witnesses	0.2
2/21/2012	Review depo TRANSCRIPTS OF GENE JAMES AND SHELLY ROHLFS TAKEN FEBRUARY 6, 2012, make notes for trial excerpts and/or cross-examination	2.0
2/22/2012	Review depo TRANSCRIPTS OF SUSAN BURTCHETT, SUSAN PETTIJOHN AND SUSAN HALLELAND TAKEN FEBRUARY 7, 2012, make notes for trial excerpts and/or cross-examination	2.3
2/22/2012	Review depo TRANSCRIPTS OF SHELLY MOSTELLER, ROGER SALVATORE, ASLI PLUNKETT AND WENDY SANDERLIN TAKEN FEBRUARY 8, 2012, make notes for trial excerpts and/or cross-examination	2.8

<b>Date</b>	<b>Item</b>	<b>Hrs</b>
2/22/2012	Review depo TRANSCRIPTS OF SYLVIA DE CHANDT, RAYMOND PEPPER AND CHRIS NIELSEN TAKEN FEBRUARY 9, 2012, make notes for trial excerpts and/or cross-examination	3.1
2/23/2012	Review depo TRANSCRIPTS OF LEANNE TELLEZ, BARBARA KLUSEK AND STEPHANIE BRINSFIELD TAKEN FEBRUARY 10, 2012, make notes for trial excerpts and/or cross-examination	1.9
2/27/2012	Review depo TRANSCRIPTS OF KIMBERLYN SKOLNIK, DIANNE EVANS AND FLORENCE LEA HAGGERTY TAKEN FEBRUARY 13, 2012, make notes for trial excerpts and/or cross-examination	2.5
2/27/2012	Review depo TRANSCRIPTS OF EDDIE NIEVES AND PAUL BARNARD TAKEN FEBRUARY 14, 2012, make notes for trial excerpts and/or cross-examination	1.1
3/1/2012	Review depo TRANSCRIPTS OF WENDY SANDERLIN - VOLUME II AND BARBARA KLUSEK - VOLUME II TAKEN FEBRUARY 16, 2012, make notes for trial excerpts and/or cross-examination	1.8
3/5/2012	Review email from Tom Rinkus Jr. and attached deposition of Jessica Gessele	0.9
3/12/2012	Review email from Tom Rinkus Jr. and attached deposition of Christina Luchau	0.8
3/19/2012	Review email from Tom Rinkus Jr. and attached depositions of Nicole and Ashley Gessele	1.1
3/20/2012	Review email from Tom Rinkus Jr. and attached deposition of Tricia Tetrault	0.8
10/12/2012	Exchange multiple emails with Cameron Azari re notice protocols, declaration, and potential testimony and/or deposition	0.3
11/27/2012	Review email from Tom Rinkus Jr. and attached deposition of Cameron Azari	0.6
12/27/2013	Review letter from Parker and supplementary interrogatory responses, memo to file re compelling	0.6
7/2/2015	Emails to and from Judge Brown re joint proposed case management order	0.2
10/2/2015	Exchange multiple emails with law librarian with previous versions of OAR re meal periods, review and note differences for certification argument	1.1
11/24/2015	Review email from Kris Felix re Northwest Group subpoena and attached 600-plus page production	2.1

<b>Date</b>	<b>Item</b>	<b>Hrs</b>
12/18/2015	Review deposition of Jessica Gessele, make notes for direct exam and potential cross-exam	2.1
2/16/2016	Review email from court re checklist of issues to address at hearing; prepare memo to file gathering information to address those issues	0.5
4/13/2018	Review email from Epiq re data aggregation project, thorough review and analysis of resulting spreadsheet for determination of damages	3.7
9/25/2018	Review Jack in the Box settlement offer, do math to figure out what they're offering	0.7
5/28/2019	Review email from Jody Harper at court re revision necessary for court filing; prepare revision	0.2
12/16/2019	Prepare email to Court with alternative proposed schedules	0.3
8/18/2022	Review email from Erin Staggenborg re opt-out requests (x4)	0.2
8/26/2022	Exchange multiple emails with Jennifer Murphy re data source, requested data analysis	0.2
8/29/2022	Exchange multiple emails with Jennifer Murphy re data source, requested data analysis	1.3
9/2/2022	Review proposed jury instructions from other side	0.4
9/5/2022	Emails re Zoom conferral, Zoom	0.3
9/14/2022	Review and revise joint ruling charts	1.9
9/14/2022	Exchange emails re joint ruling charts, attached charts	0.4
9/20/2022	Exchange emails with opposing counsel re conferral on surresponse	0.2
9/25/2022	Prepare emails x3 to client re case status	0.2
10/3/2022	Exchange multiple emails with Jennifer Murphy re result of data analysis	0.5
10/4/2022	Review transcript from hearing, notes for trial	1.1
10/4/2022	Exchange emails with Houston Bolles re format for remote testimony for trial	0.2
10/4/2022	Exchange multiple emails with Jennifer Murphy re result of data analysis	0.4
10/5/2022	Exchange multiple emails with Jennifer Murphy re result of data analysis	0.9
10/7/2022	Review transcript from hearing, notes for trial	1.8
10/7/2022	Exchange multiple emails with Jennifer Murphy re trial presentation	0.3
10/10/2022	Exchange emails with opposing counsel re their motion to limit Murphy	0.2

<b>Date</b>	<b>Item</b>	<b>Hrs</b>
10/13/2022	Review email from Darcy Deibele re Czechowski backup documents, and review documents	2.9
10/14/2022	Exchange emails with opposing counsel re potential stipulation to damage figures	0.3
10/14/2022	Exchange multiple emails with Jennifer Murphy re trial presentation	0.3
10/16/2022	Exchange emails with opposing counsel and review their and prepare our counterproposals for settlement/stipulation/streamlining trials (includes legal research regarding settlement precluding standing to appeal denial of class certification)	3.4
10/16/2022	Review email from Darcy Deibele re joint depo designations x3	0.2
10/17/2022	Exchange multiple emails with Jennifer Murphy re trial presentation	0.8
10/18/2022	Exchange multiple emails with Jennifer Murphy re trial presentation	2.6
10/18/2022	Review email from Emily Smith Harrington re Jennifer Murphy presentation (x2)	0.3
10/20/2022	Exchange emails with Emily Smith Harrington re closing revisions (x18)	0.7
10/23/2022	Exchange emails with Emily Smith Harrington re closing revisions (x14)	0.7
11/1/2022	Review email from opposing counsel re interest spreadsheet; revise spreadsheet to conform to suggestion, email to opposing counsel with result	1.0

4. The following is a breakdown of the 196 routine telephone calls with clients regarding case dates or scheduling concerns, for which I billed only 0.075 hours each (previously totaled as 14.7 hours on the first line of paragraph 14 in Dkt. 446).

<b>Year</b>	<b>Calls</b>
2010	33
2011	26
2012	51
2013	16
2014	16
2015	19
2016	11
2017	2
2018	5

<b>Year</b>	<b>Calls</b>
2019	1
2020	4
2021	2
2022	6
2023	4

5. Paralegal Michèle Lauzier accrued the following 4.4 hours of multiple and/or nonroutine email exchanges (presented here in date order, previously presented in paragraph 15 of Dkt. 446):

<b>Date</b>	<b>Email</b>	<b>Hours</b>
1/3/2011	Exchange emails from Donna Ausbie re Judge's copies of documents	0.1
1/25/2011	email to Donna Ausbie re WordPerfect document for judge	0.1
1/26/2011	Exchange emails from Donna Ausbie re Judge's copies of documents	0.1
2/2/2011	Exchange emails from Donna Ausbie re Judge's copies of documents	0.1
3/29/2011	Exchange emails from Donna Ausbie re Judge's copies of documents	0.1
4/14/2011	Exchange emails from Donna Ausbie re Judge's copies of documents	0.1
4/15/2011	Exchange emails from Donna Ausbie re Judge's copies of documents	0.1
4/18/2011	Exchange emails from Donna Ausbie re Judge's copies of documents	0.1
1/16/2012	Exchange emails with Naegeli representative re confirmation of deposition dates	0.1
1/30/2012	Exchange emails with Naegeli re depositions	0.1
2/1/2012	Exchange emails with Naegeli re depositions	0.1
2/2/2012	Email with naegeli re depositions and exhibits	0.1
2/3/2012	Exchange emails with Naegeli re depositions	0.1
2/3/2012	Exchange emails with Naegeli representatives re exhibits to be printed for witnesses in San Diego	0.1
2/6/2012	Exchange emails with Naegeli re depositions	0.1
2/10/2012	Exchange emails with Naegeli representatives re rough drafts and realtime	0.1
2/11/2012	Retrieve and review documents from Jack in the Box case in Riverside, CA	0.1
2/13/2012	Exchange emails with Naegeli representatives re rough drafts and realtime	0.1
2/14/2012	Email with naegeli re depositions and exhibits	0.1
2/14/2012	Exchange emails with Naegeli representatives re rough drafts and realtime	0.1
2/15/2012	Emails with naegeli re depositions and exhibits	0.1
2/15/2012	Exchange emails with Naegeli representative re confirmation of deposition dates	0.1
2/27/2012	Email with naegeli re depositions and exhibits	0.1
3/1/2012	Emails with naegeli re depositions and exhibits	0.1

<b>Date</b>	<b>Email</b>	<b>Hours</b>
3/22/2012	Emails with Beovich Walter re replacement invoices and disregarding previous versions	0.1
3/23/2012	Review email from court reporter re error in transcript of Jessica Gessele	0.1
1/9/2014	Exchange emails with Amanda LeGore re transcript of hearing	0.1
1/10/2014	Exchange emails with Amanda LeGore re transcript of hearing	0.1
6/10/2014	Exchange emails with ABC re process service	0.1
6/10/2014	Exchange emails with ABC re process service	0.1
12/11/2015	Review email from court reporter re copy of transcript	0.1
12/18/2015	Review email from court reporter re copy of transcript	0.1
12/23/2015	Review email from Gina Blalack re transcript of Ray Baluyut	0.1
8/11/2016	Exchange emails with court reporters re videoconference and documents to be printed for witnesses	0.1
8/12/2016	Exchange emails with court reporters re videoconference and documents to be printed for witnesses	0.1
8/12/2016	Exchange emails with court reporters re videoconference and documents to be printed for witnesses (second set)	0.1
6/25/2021	Exchange email with Chris Iba re incorrect word index in transcript	0.1
8/31/2022	Exchange emails with MercuryPDX re document delivery	0.1
9/2/2022	Review email from Darcy Deibele re copies of exhibits	0.1
9/6/2022	Email from Ryan White re transcript	0.1
9/28/2022	Review email from Darcy Deibele re Dropbox file sharing system	0.1
10/2/2022	Review email from Darcy Deibele re exhibit 512 correction	0.1
10/2/2022	Review email from Darcy Deibele re stamped exhibits	0.1
10/14/2022	Exchange emails with MercuryPDX re document delivery	0.1

6. Paralegal Michèle Lauzier and I performed the following tasks in furtherance of this case, in the following years, with the number of hours associated listed in each biller's column (previously presented without years in paragraph 16 of Dkt. 446):

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2010	Gessele I	Intake meeting with Jessica Gessele	5.1	3.4
2010	Gessele I	Intake meeting with Ashley Gessele	3.3	3.3
2010	Gessele I	Intake meeting with Nicole Gessele	4.7	4.7
2010	Gessele I	Intake meeting with Tricia Tetrault	4.4	4.4
2010	Gessele I	Intake meetings with Christina Luchau	7.4	7.4
2010	Gessele I	Review documents to prepare for oral argument, including comparing electronic to paper and vice versa, prepare memorandum to file	4.5	
2010	Gessele I	Web, SEC filings, other research into Jack in the Box		13.4

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2010	Gessele I	Prepare foia requests to AZ, CA, CO Labor, CO Civil Rights, HI, ID, IL Labor, IL Human Rights, LA, MO, NC, NM, NV, OK, SC, TN, TX, USDOL, US EEOC, UT, WA re complaints against Jack in the Box	10.2	
2010	Gessele I	Review filings in Amaya, Gibbs previous cases against JITB	6.2	
2010	Gessele I	Draft complaint (including exhaustive legal research)	29.3	
2010	Gessele I	Review, proofread, and cite check complaint		3.5
2010	Gessele I	Draft motion to extend pretrial deadlines [5]	0.2	
2010	Gessele I	Review D's notice of appearance, motion to dismiss, memo in support [7-9]	0.6	
2010	Gessele I	Prepare for, attend 26(f) conference 12/23/10	2.1	0.6
2011	Gessele I	Prepare response to D's mtn to dismiss [11]	8.9	
2011	Gessele I	Review, proofread, and cite check response to D's mtn to dismiss [11]		2.7
2011	Gessele I	Review D's reply [12]	0.3	
2011	Gessele I	Prepare for, attend, prepare memorandum to file re hearing on D's mtn to dismiss [13] 1/25/11	7.7	3
2011	Gessele I	Prepare for, attend Rule 16 conference 2/2/11	3.8	3
2011	Gessele I	Review F&R re D's mtn to dismiss [16]	0.6	
2011	Gessele I	Prepare objections to [16]	10.8	
2011	Gessele I	Review, proofread, and cite check objections to [16]		3.2
2011	Gessele I	Review D's resp [21]	0.3	
2011	Gessele I	Prepare mtn to compel [22-23]	10.5	
2011	Gessele I	Review, proofread, and cite check mtn to compel [22-23]		3
2011	Gessele I	Prepare JME Dec [24]	0.6	
2011	Gessele I	Review Order [26], prepare memo to file re potential appeal notes	0.3	
2011	Gessele I	Review D's resp to MTC [27] and Nelson Dec [28]	0.6	
2011	Gessele I	Prepare mtn for leave to file Reply [29] and proposed reply	17	
2011	Gessele I	Review, proofread, and cite check mtn for leave to file Reply [29] and proposed reply		3.5
2011	Gessele I	Prepare for, attend hrg on motion to compel 4/18/11	3.8	3
2011	Gessele I	Review Order on MTC [32], prepare notes to file re discovery followup	0.5	
2011	Gessele I	Prepare first amended complaint	16.2	
2011	Gessele I	Review, proofread, and cite check first amended complaint		2.9
2011	Gessele I	Review Answer [35], prepare memo to file re mtn to strike	1.1	
2011	Gessele I	Prepare protective order	1.7	

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2011	Gessele I	Prepare motion to strike affirmative defenses	20.3	
2011	Gessele I	Review, proofread, and cite check motion to strike affirmative defenses		3
2011	Gessele I	Prepare for and attend Status conference 8/2/11	1.5	1.5
2011	Gessele I	Review D's resp to mtn to strike, prepare memo re reply	1.4	
2011	Gessele I	Prepare Reply re motion to strike	44.6	
2011	Gessele I	Review, proofread, and cite check Reply re motion to strike		4.8
2011	Gessele I	Prepare for and attend hearing on motion to strike 8/30/11	8	3
2011	Gessele I	Review Order on mtn to strike, prepare memo to file re appeal notes	0.6	
2011	Gessele I	Prepare mtn to enlarge pages for MTC, proposed memo	43.1	
2011	Gessele I	Review, proofread, and cite check mtn to enlarge pages for MTC, proposed memo		5.3
2011	Gessele I	Prepare substantial Declaration re MTC, highlight pertinent portions of exhibits	28.8	
2011	Gessele I	Review, proofread, and cite check substantial Declaration re MTC, highlight pertinent portions of exhibits		3.2
2011	Gessele I	Review D's resp to MTC [54], Nelson Dec [55], prepare memo re reply	3	
2011	Gessele I	Prepare reply, mtn for leave to file same re MTC	13.4	
2011	Gessele I	Review, proofread, and cite check reply, mtn for leave to file same re MTC		1.5
2011	Gessele I	Prepare for, attend telephonic motion to compel 12/14/11	3.6	3
2011	Gessele I	Review Order [59] and prepare memo for discovery	0.9	
2012	Gessele I	Curate discovery received to date, prepare memo re exhibits for depositions	15	
2012	Gessele I	Prepare deposition outlines for 30(b)(6), review exhibits, paste appropriate excerpts into outline with highlighting and questions attached	84	
2012	Gessele I	Prepare for and attend 2 weeks of 30(b)(6) depositions at corporate headquarters in San Diego, CA	291.9	225
2012	Gessele I	Depo prep Jessica Gessele	7.7	7.7
2012	Gessele I	Depo prep Ashley Gessele	9.3	9.3
2012	Gessele I	Depo prep Nicole Gessele	7.4	7.4
2012	Gessele I	Depo prep Tricia Tetrault	8.7	8.7
2012	Gessele I	Depo prep Christina Luchau	8.4	8.4
2012	Gessele I	Prepare for, attend Jessica Gessele deposition 2/27/12	10.5	7.7
2012	Gessele I	Prepare for, attend Christina Luchau deposition 3/2/12	10.7	7.4

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2012	Gessele I	Prepare for, attend Ashley Gessele and Nicole Gessele depositions 3/7/12	12.2	9
2012	Gessele I	Prepare for, attend Tricia Tetrault deposition 3/13/12	10.4	8.1
2012	Gessele I	Prepare motion to amend [63] and proposed amended complaint reflecting depo info	8.1	7.7
2012	Gessele I	Review, proofread, and cite check motion to amend [63] and proposed amended complaint reflecting depo info		0.9
2012	Gessele I	Prepare motion to extend pretrial deadlines [66]	0.3	
2012	Gessele I	Prepare for and attend hearing on motion to extend	2.7	2.4
2012	Gessele I	Review D's amended answer [70], prepare memo to file re avenues for attack	1.2	
2012	Gessele I	Prepare mtn for leave to serve additional interrogatories [71], and proposed supplemental interrogatories	15.3	
2012	Gessele I	Review, proofread, and cite check mtn for leave to serve additional interrogatories [71], and proposed supplemental interrogatories		2.1
2012	Gessele I	Review response to mtn for leave [73]	0.3	
2012	Gessele I	Review D's mtn to revise case schedule 74]	0.2	
2012	Gessele I	Prepare response to D's mtn to revise case schedule [75] and supporting Dec	39.5	
2012	Gessele I	Review, proofread, and cite check response to D's mtn to revise case schedule [75] and supporting Dec		4.5
2012	Gessele I	Prepare for and attend hearing on new affirmative defenses 5/22/12	4.1	3.2
2012	Gessele I	Prepare motion to compel, mtn for leave to exceed pages on same, supporting declaration [80-82]	34.5	
2012	Gessele I	Review, proofread, and cite check motion to compel, mtn for leave to exceed pages on same, supporting declaration [80-82]		6.8
2012	Gessele I	Prepare exhibits for declaration re motion to compel		3.6
2012	Gessele I	Review D's reply re one-way intervention and supporting dec [86-87]	0.8	
2012	Gessele I	Prepare sursresponse and mtn for leave to file it [89]	9.2	
2012	Gessele I	Review, proofread, and cite check sursresponse and mtn for leave to file it [89]		1.5
2012	Gessele I	Review D's resp to P's MTC [90]	0.6	
2012	Gessele I	Prepare for and attend argument on motion to compel	5.6	3.2
2012	Gessele I	Review Salvatore declaration, prepare notice of nonfulfillment of court order [94-95]	3.3	

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2012	Gessele I	Review, proofread, and cite check notice of nonfulfillment of court order [94-95]		1.1
2012	Gessele I	Review D response, new Salvatore Dec	2	
2012	Gessele I	Prepare motion to conditionally reconsider case schedule change [98-100]	7.4	
2012	Gessele I	Review, proofread, and cite check motion to conditionally reconsider case schedule change [98-100]		0.9
2012	Gessele I	Review D response to mtn to reconsider, notes for reply	1.1	
2012	Gessele I	Prepare reply re mtn to reconsider [106]	10.5	
2012	Gessele I	Review, proofread, and cite check reply re mtn to reconsider [106]		1.7
2012	Gessele I	Prepare for and attend hearing on mtn to reconsider	1.5	
2012	Gessele I	Prepare motion for class certification [110]	88.4	
2012	Gessele I	Review, proofread, and cite check motion for class certification [110]		8.9
2012	Gessele I	Prepare declaration supporting certification [111]	3.9	
2012	Gessele I	Prepare exhibits for filing, emphasize appropriate sections for Court		15.9
2012	Gessele I	Review D extensive response to cert, multiple happy camper manager decs, and attorney dec with extensive exhibits, prepare notes for reply [115-125]	10.4	
2012	Gessele I	Prepare reply re class cert [127]	201	
2012	Gessele I	Review, proofread, and cite check reply re class cert [127]		39.2
2012	Gessele I	Prepare declaration in support of cert and exhibits [128]	5.7	
2012	Gessele I	Review, proofread, and cite check declaration in support of cert and exhibits [128]		0.6
2012	Gessele I	Meet with notice expert Cameron Azari re notice viability, review proposed declaration, discuss potential testimony	6.2	
2012	Gessele I	Prepare for and attend deposition of Cameron Azari 11/15/12	4.7	
2012	Gessele I	Review D mtn to amend Answer [132-33]	0.6	
2012	Gessele I	Review D mtn to strike Azari Dec, prepare memo re response [134-35]	1.2	
2012	Gessele I	Prepare for and attend argument on certification, prepare memo to file re additional deposition excerpts to supplement record	8.9	3
2012	Gessele I	Review D supplemental mtn to amend, prepare notes for response [140]	0.9	
2012	Gessele I	Prepare notice of D's failure to file add'l evidence [143]	2.1	

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2012	Gessele I	Review, proofread, and cite check notice of D's failure to file add'l evidence [143]		0.3
2012	Gessele I	Prepare response to D's mtn to amend Answer [145]	27.3	
2012	Gessele I	Review, proofread, and cite check response to D's mtn to amend Answer [145]		4.6
2012	Gessele I	Review D reply re mtn to amend answer [146-47], notes for argument	0.6	
2012	Gessele I	Prepare motion to amend [149] and proposed amended complaint	57	
2012	Gessele I	Review, proofread, and cite check motion to amend [149] and proposed amended complaint		9.5
2013	Gessele I	Review D 2nd amended answer; prepare memo re potential motions against	2.1	
2013	Gessele I	Review D resp to P's mtn to amend, Rand Dec [154-55]	1.5	
2013	Gessele I	Prepare Reply re P mtn to amend [156]	26.1	
2013	Gessele I	Review, proofread, and cite check Reply re P mtn to amend [156]		4.4
2013	Gessele I	Review 78-page F&R re class certification [158], prepare memorandum to file re objection potentials	6.2	
2013	Gessele I	Review D objections, prepare memo to file re response	1.7	
2013	Gessele I	Prepare proposed objections to [157]	116.9	
2013	Gessele I	Review, proofread, and cite check proposed objections to [157]		19.5
2013	Gessele I	Briefings re request to expand page limit for objections (including reply)	3.2	
2013	Gessele I	Review, proofread, and cite check briefings re request to expand page limit for objections (including reply)		0.5
2013	Gessele I	Curate briefing so as to reduce it to court-allowed limit [166]	12.2	
2013	Gessele I	Review, proofread, and cite check revised briefing		2
2013	Gessele I	Prepare response to D's objections [167]	35.4	
2013	Gessele I	Review, proofread, and cite check response to D's objections [167]		5.9
2013	Gessele I	Prepare notice of supplemental authority re Amgen case [168]	1.2	
2013	Gessele I	Review, proofread, and cite check notice of supplemental authority re Amgen case [168]		0.2
2013	Gessele I	Review D notice of supplemental authority re Wang [169], Wang, consider response and notes for oral argument	1.2	

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2013	Gessele I	Review D resp to P's objections [170], update memo to file re argument	4.7	
2013	Gessele I	Prepare response to D supp authority notice re Wang [171]	1.8	
2013	Gessele I	Review, proofread, and cite check response to D supp authority notice re Wang [171]		0.3
2013	Gessele I	Review D notice of authority re Comcast [172], Comcast, update notes for oral argument	1.4	
2013	Gessele I	Review D mtn for summary judgment [175] and declaration	1.1	
2013	Gessele I	Review D mtn to amend [178]	0.6	
2013	Gessele I	Prepare motion to revise schedule [180} and memo	3.2	
2013	Gessele I	Review, proofread, and cite check motion to revise schedule [180} and memo		0.5
2013	Gessele I	Prepare resp to D's mtn to amend [186]	45.6	
2013	Gessele I	Review, proofread, and cite check resp to D's mtn to amend [186]		7.6
2013	Gessele I	Prepare objection to order granting amendment [196]	39.6	
2013	Gessele I	Review, proofread, and cite check objection to order granting amendment [196]		6.6
2013	Gessele I	Prepare FRCP 56(d) declaration [204]	5.4	
2013	Gessele I	Prepare motion for notice [206]	3.5	
2013	Gessele I	Review, proofread, and cite check motion for notice [206]		0.6
2013	Gessele I	Review D resp to 56(d), Dec and exhibits accompanying [209-210]	1.7	
2013	Gessele I	Review D motion to stay, prepare response [219]	2.9	
2013	Gessele I	Review, proofread, and cite check response [219]		0.5
2013	Gessele I	Prepare reply re notice [222]	15.6	
2013	Gessele I	Review, proofread, and cite check reply re notice [222]		2.6
2013	Gessele I	Review D resp to notice mtn, prepare surreply [236]	42.5	
2013	Gessele I	Review, proofread, and cite check surreply [236]		7.1
2013	Gessele I	Review D resp to our MSJ / D's cross-MSJ, prepare response/reply to same [245-46]	56.7	
2013	Gessele I	Review, proofread, and cite check response/reply to D resp/cross-msj [245-46]		9.5
2013	Gessele I	Prepare Declaration with extensive exhibits	10.4	
2013	Gessele I	Review, proofread, and cite check Declaration with extensive exhibits		1.7
2014	Gessele I	Prepare motion to compel and/or strike [Dkt. 254-55]	45.3	

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2014	Gessele I	Review, proofread, and cite check motion to compel and/or strike [Dkt. 254-55]		7.6
2014	Gessele I	Prepare resp to D's SOL MSJ [261]	57.3	
2014	Gessele I	Review, proofread, and cite check resp to D's SOL MSJ [261]		9.6
2014	Gessele I	Prepare declarations re 261	4.4	
2014	Gessele I	Review, proofread, and cite check declarations re 261		0.7
2014	Gessele I	Review D reply re SOL MSJ, declarations in support; prepare motions to strike new declarations submitted by D with reply	5.4	
2014	Gessele I	Review, proofread, and cite check motions to strike new declarations submitted by D with reply		0.9
2014	Gessele I	Review resp, prepare reply re mtn to strike [282]	2.7	
2014	Gessele I	Review, proofread, and cite check reply re mtn to strike [282]		0.5
2014	Gessele I	Review substantial order re pending motions [283], do legal research and prepare notes for potential appeal and/or refile in state court	15.3	
2014	Gessele I	Review D's cost bill (initial, then withdrawn, then new bill and memo), prepare objection	10.8	
2014	Gessele I	Review, proofread, and cite check objection		1.8
2014	Gessele I	Prepare motion to clarify or amend order and judgment to provide for dismissal without prejudice rather than with prejudice	13.4	
2014	Gessele I	Review, proofread, and cite check motion to clarify or amend order and judgment to provide for dismissal without prejudice rather than with prejudice		2.2
2014	Gessele I	Prepare motion to revise schedule [289]	3	
2014	Gessele I	Review, proofread, and cite check motion to revise schedule [289]		0.5
2014	Gessele I	Review D resp to mtn to amend order/judgment	0.5	
2014	Gessele I	Prepare Plaintiffs' cost bill, memo and declaration in support [302-304]	18.9	
2014	Gessele I	Review, proofread, and cite check Plaintiffs' cost bill, memo and declaration in support [302-304]		3.2
2014	Gessele I	Review D's resp to our cost bill; prepare reply [308]	7.4	
2014	Gessele I	Review, proofread, and cite check reply [308]		1.2
2014	Gessele I	Review D's reply re their cost bill; prepare notes for potential surreply	4.5	

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2014	Gessele I	Prepare motion to remand [309]	7.5	
2014	Gessele I	Review, proofread, and cite check motion to remand [309]		1.3
2014	Gessele II	Legal research re 12.220 application	4.7	
2014	Gessele II	Prepare complaint incorporating additional information acquired since previous filings	4.4	
2014	Gessele II	Review D's removal documents [1-5], make notes re potential remand	6.8	
2014	Gessele II	Prepare motion to remand [7]	4.7	
2014	Gessele II	Review, proofread, and cite check motion to remand [7]		0.8
2014	Gessele II	Review D's response to motion to remand; prepare reply [10]	14.1	
2014	Gessele II	Review, proofread, and cite check reply [10]		2.4
2014	Gessele II	Review order remanding, and D's motion to stay	3.8	
2014	Gessele II	Review D's petition to appeal under 1453(c) and appendix, make notes for answer	6.2	
2014	Gessele II	Prepare answer in opposition to petition	51.8	
2014	Gessele II	Review, proofread, and cite check answer in opposition to petition		8.6
2015	Gessele II	Prepare appellees' brief for accepted appeal	182.6	
2015	Gessele II	Review, proofread, and cite check appellees' brief for accepted appeal		30.4
2015	Gessele II	Prepare outline for supplemental excerpt of record	5.1	
2015	Gessele II	Prepare supplemental excerpt of record		9.2
2015	Gessele II	Review JITB brief and ER, make outline for addressing arguments	10.7	
2015	Gessele II	Prepare for oral argument (including moot courts)	41.1	
2015	Gessele II	Attend oral argument	7.5	
2015	Gessele II	Review mandate and memorandum disposition	1.2	
2015	Gessele II	Prepare joint case management proposal 24	1.5	
2015	Gessele II	Review D's discovery plan	0.3	
2015	Gessele II	Review D's MSJ and declarations [27-31], take notes re response	3.2	
2015	Gessele II	Prepare MSJ re SOL [32]	16.5	
2015	Gessele II	Review, proofread, and cite check MSJ re SOL [32]		2.8
2015	Gessele II	Prepare MSJ re JITB's aff defs [33]	27.2	
2015	Gessele II	Review, proofread, and cite check MSJ re JITB's aff defs [33]		4.5
2015	Gessele II	Review D's resp to 32, notes for reply	1.1	

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2015	Gessele II	Review D's resp to 33, notes for reply	1.4	
2015	Gessele II	Prepare resp to D's MSJ [36], JME Dec [37]	40.5	
2015	Gessele II	Review, proofread, and cite check resp to D's MSJ [36], JME Dec [37]		6.8
2015	Gessele II	Prepare reply re 32	9	
2015	Gessele II	Review, proofread, and cite check reply re 32		1.5
2015	Gessele II	Prepare reply re 33	24.2	
2015	Gessele II	Review, proofread, and cite check reply re 33		4
2015	Gessele II	Review D resp re D MSJ/Dec, notes re surresponse needed	3.2	
2015	Gessele II	Work on protective order	1.7	
2015	Gessele II	Prepare discovery plan [45]	1.5	
2015	Gessele II	Prepare motion to compel [46] and JME dec [47]	11.4	
2015	Gessele II	Review, proofread, and cite check motion to compel [46] and JME dec [47]		1.9
2015	Gessele II	Prepare motion to compel information from franchisees, JME Dec	4.5	
2015	Gessele II	Review franchisees' mtns to quash	0.9	
2015	Gessele II	Prepare response to franchisees' mtn to quash [54]	6	
2015	Gessele II	Review Order re MSJs, notes for argument	0.3	
2015	Gessele II	Review D's mtn for reconsideration and supporting dec [63-64]	0.8	
2015	Gessele II	Prepare response to D's mtn for reconsideration	5.1	
2016	Gessele II	Prepare motion for certification, mtn for excess pages [67]	167.4	
2016	Gessele II	Review, proofread, and cite check motion for certification, mtn for excess pages [67]		27.9
2016	Gessele II	Prepare JME dec for cert [68]	13.4	
2016	Gessele II	Prepare for, attend oral argument re PMSJ mtns [27, 32, 33]	6.8	3.2
2016	Gessele II	Prepare declarations for clients re cert	4.4	
2016	Gessele II	Review D's mtn to stay cert briefing, prepare resposne	4.7	
2016	Gessele II	Prepare joint statement [84]	6.9	
2016	Gessele II	Review Order on MSJs [85], memo to file re potential avenues for appeal	3.2	
2016	Gessele II	Prepare joint statement [87]	2.9	
2016	Gessele II	Prepare joint status report [89]	3.9	
2016	Gessele II	Prepare for and attend 8/12/16 depositions x2	12.5	9
2016	Gessele II	Work on joint statement of agreed facts [92]	3	

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2016	Gessele II	Review Ds' partial MSJ and Warberg Dec [95-96], notes for reply	2.9	
2016	Gessele II	Prepare response and mtn for overlong response [97]	110.7	
2016	Gessele II	Review, proofread, and cite check response and mtn for overlong response [97]		18.5
2016	Gessele II	Prepare JME Dec [98]	15.9	
2016	Gessele II	Review, proofread, and cite check JME Dec [98]		2.7
2016	Gessele II	Review D's reply re MSJ [101], declarations, supplemental authority, notes for surresponse	4.7	
2016	Gessele II	Prepare response to D's mtn for supplemental authority [105]	2.7	
2016	Gessele II	Review order on MSJs [108], memo re potential avenues for appeal	5.1	
2017	Gessele II	Prepare joint status report [110]	0.8	
2017	Gessele II	Prepare for and attend status conference 1/25/17	3.8	3
2017	Gessele II	Prepare motion to certify [113], plaintiff declarations (2.1)	102.6	
2017	Gessele II	Review, proofread, and cite check motion to certify [113], plaintiff declarations (2.1)		17.1
2017	Gessele II	Prepare JME dec [119] and exhibits	19.8	
2017	Gessele II	Review D's resp to cert mtn [128], decs in support, notes for reply	4.4	
2017	Gessele II	Prepare reply re cert [138]	51	
2017	Gessele II	Review, proofread, and cite check reply re cert [138]		8.5
2017	Gessele II	Review Ordeer granting cert [139], prepare memo re appeal	2.6	
2017	Gessele II	Prepare joint status report [140]	0.3	
2017	Gessele II	Prepare motion for class notice [143]	28.4	
2017	Gessele II	Review D resp, prepare reply [145]	18	
2018	Gessele II	Prepare for and attend 1/25/18 hearing on motion to appoint class administrator and authorize notice [143]	8	3
2018	Gessele II	Prepare joint status [150]	0.6	
2018	Gessele II	Review D's pre-JSC letters, Prepare pre-JSC settlement offer letters	1.8	
2018	Gessele II	Attend scheduling conference 12/18/18	5.3	3
2019	Gessele II	Prepare joint statement of agreed facts for MSJs (several drafts)	6	
2019	Gessele II	Review D's mtn for excess pages [159]	0.2	

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2019	Gessele II	Review D's MSJs re arbitration [161], tax bar [162], deduction remedy [163], SOL on breach of fiduciary duty [164], equity [165], and supporting declarations, and make notes re responses	3.8	
2019	Gessele II	Prepare P's response to 161	18.8	
2019	Gessele II	Review, proofread, and cite check P's response to 161		3.1
2019	Gessele II	Prepare P's response to 162	15.3	
2019	Gessele II	Review, proofread, and cite check P's response to 162		2.6
2019	Gessele II	Prepare P's response to 163	7.7	
2019	Gessele II	Review, proofread, and cite check P's response to 163		1.3
2019	Gessele II	Prepare P's response to 164	1.8	
2019	Gessele II	Review, proofread, and cite check P's response to 164		0.3
2019	Gessele II	Prepare P's response to 165	8.1	
2019	Gessele II	Review, proofread, and cite check P's response to 165		1.4
2019	Gessele II	Prepare MSJ 172	23.1	
2019	Gessele II	Review, proofread, and cite check MSJ 172		3.9
2019	Gessele II	Prepare MSJ 174	1.4	
2019	Gessele II	Review, proofread, and cite check MSJ 174		0.2
2019	Gessele II	Prepare MSJ 175	0.6	
2019	Gessele II	Review, proofread, and cite check MSJ 175		0.1
2019	Gessele II	Prepare MSJ 176	0.6	
2019	Gessele II	Review, proofread, and cite check MSJ 176		0.1
2019	Gessele II	Prepare MSJ 177	0.6	
2019	Gessele II	Review, proofread, and cite check MSJ 177		0.1
2019	Gessele II	Prepare MSJ 178	0.6	
2019	Gessele II	Review, proofread, and cite check MSJ 178		0.1
2019	Gessele II	Prepare MSJ JME Dec re all MSJs	9.2	
2019	Gessele II	Review, proofread, and cite check MSJ JME Dec re all MSJs		1.5
2019	Gessele II	Review D replies 185-189, prepare memo re potential surresponse	4.7	
2019	Gessele II	Review D responses 190-201, prepare memo re replies	3.2	
2019	Gessele II	Prepare motion to strike and/or for leave to file surresponse 202)	2.3	
2019	Gessele II	Convert and aggregate Czechowski Excel spreadsheets, perform data analysis for damage figures, Draft MLL declaration	14.3	
2019	Gessele II	Prepare Reply 205	16.2	

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2019	Gessele II	Review, proofread, and cite check Reply 205		2.7
2019	Gessele II	Prepare Reply 207	2.1	
2019	Gessele II	Review, proofread, and cite check Reply 207		0.4
2019	Gessele II	Prepare Reply 208	1.7	
2019	Gessele II	Review, proofread, and cite check Reply 208		0.3
2019	Gessele II	Prepare Reply 209	14.4	
2019	Gessele II	Review, proofread, and cite check Reply 209		2.4
2019	Gessele II	Prepare Reply 210	12.8	
2019	Gessele II	Review, proofread, and cite check Reply 210		2.1
2019	Gessele II	Prepare Reply 211	16.7	
2019	Gessele II	Review, proofread, and cite check Reply 211		2.8
2019	Gessele II	Prepare Reply 216	17.6	
2019	Gessele II	Review, proofread, and cite check Reply 216		2.9
2019	Gessele II	Review MSJ order 217 (142 pages), prepare notes re appeal	5.6	
2020	Gessele II	Review, proofread, and cite check Reply [229]		6.2
2020	Gessele II	Review D filing re Jack's Timekeeping conversion dates [230-231], notes re response	1.7	
2020	Gessele II	Prepare joint status report [234]	0.3	
2020	Gessele II	Prepare joint status report [238]	0.3	
2020	Gessele II	Prepare joint status report [241]	1.7	
2020	Gessele II	Prepare joint summary of all remaining unresolved claims and defenses [243], multiple drafts	3	
2021	Gessele II	Prepare proposed pretrial schedule [247]	3.2	
2020	Gessele II	Prepare mediation statement for Teresa Wakeen	12.3	
2020	Gessele II	Review, proofread, and cite check mediation statement for Teresa Wakeen		2.1
2020	Gessele II	Prepare for and attend Zoom mediation	14	
2022	Gessele II	Review D's mtns for trial plan and to talk to class members (!), 286-89	0.5	
2022	Gessele II	Prepare response to D mtn to talk to class members [291] (includes extensive legal research of trial court opinions regarding topic)	18.8	
2022	Gessele II	Review, proofread, and cite check response to D mtn to talk to class members [291] (includes extensive legal research of trial court opinions regarding topic)		3.1
2022	Gessele II	Prepare response to D mtn for trial plan [292]	7.7	
2022	Gessele II	Review, proofread, and cite check response to D mtn for trial plan [292]		1.3

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2022	Gessele II	Review D replies re talking to class members and trial plan	2	
2022	Gessele II	Review all discovery, prepare Ps' exhibit list [302]	15.9	
2022	Gessele II	Review, proofread, and prepare exhibits		3
2022	Gessele II	Prepare P lay witness statements (revise draft prepared by co-counsel) [303]	4.7	
2022	Gessele II	Review, proofread P lay witness statements (revise draft prepared by co-counsel) [303]		0.8
2022	Gessele II	Prepare P statement of itemized damages 304]	11	
2022	Gessele II	Review, proofread P statement of itemized damages 304]		1.8
2022	Gessele II	Prepare P trial memorandum [305]	27.2	
2022	Gessele II	Review, proofread, and cite check P trial memorandum [305]		4.5
2022	Gessele II	Review D initial filings, prepare notes for conferral re objections, prepare notes re rebuttal, begin preparing notes for cross-examinations	6.8	
2022	Gessele II	Review D mtn to strike Murphy and MLL testimony	3.6	
2022	Gessele II	Prepare objections to D witnesses and exhibits [318]	3.5	
2022	Gessele II	Review D voir dire, proposed verdict form, objections to witnesses and exhibits, MILs, prepare notes for responses	6.2	
2022	Gessele II	Prepare P MILs [315]	34.7	
2022	Gessele II	Review, proofread, and cite check P MILs [315]		5.8
2022	Gessele II	Prepare proposed voir dire [316]	6.5	
2022	Gessele II	Review, proofread proposed voir dire [316]		1.1
2022	Gessele II	Prepare proposed verdict form [317]	9.3	
2022	Gessele II	Review, proofread proposed verdict form [317]		1.6
2022	Gessele II	Prepare proposed jury instructions [our part of 319]	41	
2022	Gessele II	Review, proofread proposed jury instructions [our part of 319]		6.8
2022	Gessele II	Review D resp to objections, D resp to MILs, extensive Parker Dec	5.6	
2022	Gessele II	Prepare response to D mtn to strike Murphy and MLL testimony [326]	19.2	
2022	Gessele II	Review, proofread, and cite check response to D mtn to strike Murphy and MLL testimony [326]		3.2
2022	Gessele II	Prepare opposition to D's MILs [327]	27.5	
2022	Gessele II	Review, proofread, and cite check opposition to D's MILs [327]		4.6
2022	Gessele II	Prepare resp to D obj to witnesses, exhibits, Declaration to accompany [328-331]	39.3	

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2022	Gessele II	Review, proofread resp to D obj to witnesses, exhibits, Declaration to accompany [328-331]		6.6
2022	Gessele II	Review D reply re mtn to strike Murphy, notes for surresponse	3.5	
2022	Gessele II	Prepare proposed surresponse, mtn for leave 335-36]	20.6	
2022	Gessele II	Review, proofread, and cite check proposed surresponse, mtn for leave 335-36]		3.4
2022	Gessele II	Prepare for and attend pretrial conference 10/3/22	11	3.8
2022	Gessele II	Review D opp to mtn for surresponse, revised witness and exhibit lists, brief re absent class members	2	
2022	Gessele II	Prepare response to D suggestion to exclude absent class members [includes substantial legal research] [342]	12.5	
2022	Gessele II	Review, proofread, and cite check response to D suggestion to exclude absent class members [includes substantial legal research] [342]		2.1
2022	Gessele II	Review D memo re absent witnesses, Maher Dec	0.8	
2022	Gessele II	Review D mtn to limit Murphy testimony, Czechowski declaration (includes double-checking statistical assertions, characterizations of extensive exhibits, prepare notes for response)	16.4	
2022	Gessele II	Review D mtn to compel Murphy information	0.3	
2022	Gessele II	Prepare response to D mtn to limit Murphy testimony [353]	18.6	
2022	Gessele II	Prepare mtn to compel Czechowski documents, Dec to support [354-55]	3	
2022	Gessele II	Review D resp to our MTC, D reply re Murphy testimony	1.2	
2022	Gessele II	Prepare response to D mtn to compel [360]	4.7	
2022	Gessele II	Review, proofread, and cite check response to D mtn to compel [360]		0.8
2022	Gessele II	Prepare pocket brief re D using 30(b)(6) in case in chief [368]	8.9	
2022	Gessele II	Prepare revised jury instructions [369] re court rulings	4.2	
2022	Gessele II	Prepare revised verdict form [370} re court rulings	3.9	
2022	Gessele II	Review JITB revised verdict form and jury instructions, prepare notes for argument	2.9	
2022	Gessele II	Review D memo re Late Pay 1 category	1.2	
2022	Gessele II	Prepare response to D Late Pay 1 memo	12.2	
2022	Gessele II	Review D resp to 30(b)(6) pocket memo	0.6	

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2022	Gessele II	Zoom meetings and calls with co-counsel re pretrial and trial issues	6.2	6.2
2022	Gessele II	Prepare direct examinations and do Zoom meetings with clients for trial prep	35.1	12.2
2022	Gessele II	Jennifer Murphy witness interactions and document and presentation review: Zoom meetings phone calls with Jennifer Murphy re data analysis, trial testimony, powerpoint review and revise, looking over numbers and running simulations to test nonduplication, overlap of penalties	40.4	40.4
2022	Gessele II	AV work for trial: Zoom meetings and live meetings with Kesten Media reps re draft opening, draft closing, visualization strategies, video deposition synchronizing and excerpting, exhibit display	20.7	20.7
2022	Gessele II	Trial day 1	18.9	15.1
2022	Gessele II	Trial day 2	17.9	14.3
2022	Gessele II	Trial day 3	15.6	12.5
2022	Gessele II	Trial day 4	14.4	11.5
2022	Gessele II	Trial day 5	12.6	10.1
2022	Gessele II	Review trial transcripts from first week, work on closing statement and powerpoint	15.5	
2022	Gessele II	Continue working on closing statement and powerpoint, prepare proposed avenues for rebuttal	14.9	
2022	Gessele II	Trial day 6	12.8	9.3
2022	Gessele II	Prepare verdict analysis spreadsheet for calculation of prejudgment interest, draft judgment	5.4	
2022	Gessele II	Revise spreadsheet and draft judgment per opposing counsel's request to break out WBF and shoe penalties for named plaintiffs (includes reviewing records to see which violations caused which penalties in which statute-of-limitations periods)	3.2	
2022	Gessele II	Prepare response to defendant's motion to revise jury verdict [401]	11.7	
2022	Gessele II	Review, proofread, and cite check response to defendant's motion to revise jury verdict [401]		2.9
2022	Gessele II	Prepare response to defendant's motion to reduce prejudgment interest [403]	23.6	
2022	Gessele II	Review, proofread, and cite check response to defendant's motion to reduce prejudgment interest [403]		5.9

<b>Year</b>	<b>Subcase</b>	<b>Task</b>	<b>JME</b>	<b>MLL</b>
2022	Gessele II	Review and revise Vogele drafts of response to defendant's due process motion [404]	13.4	
2022	Gessele II	Prepare declaration in support of motion to correct the verdict [402]	2.9	
2022	Gessele II	Review, proofread, and cite check declaration in support of motion to correct the verdict [402]		0.7
2023	Gessele II	Review defendant's replies [405-409]	1.6	
2023	Gessele II	Prepare motion for leave to file attached surresponse, and surresponse [410]	10.4	
2023	Gessele II	Review, proofread, and cite check motion for leave to file attached surresponse, and surresponse [410]		2.6
2023	Gessele II	Review defendant's response to motion for leave [412]	0.3	
2023	Gessele II	Review Order on post-trial motions [414], cross-check with motions and spreadsheets previously submitted to Court	0.9	
2023	Gessele II	Prepare proposed judgment, cross-check with verdict and stipulations in trial transcript	1.1	
2023	Gessele II	Review, proofread proposed judgment, cross-check with verdict and stipulations in trial transcript		0.3
2023	Gessele II	Prepare motion for attorney fees	8.2	
2023	Gessele II	Review, proofread motion for attorney fees		2.1
2023	Gessele II	Review Judgment [416], prepare memo to file re post-judgment motions, attorney fees, appeal bases	1.7	
2023	Gessele II	Prepare response to defendant's 50(b) motion [428]	11.5	
2023	Gessele II	Review, proofread response to defendant's 50(b) motion [428]		2.9
2023	Gessele II	Review defendant's 50(b) reply, Maher Dec, Order, prepare notes for appeal [432-33]	3.3	
2023	Gessele II	Prepare for and attend hearing on defendant's motion for supersedeas bond [430], including reviewing motion and comparing math to our firm's post-judgment interest calculations	0.9	
2023	Gessele II	Revise and amend motion for attorneys post-50(b) ruling	5.1	
2023	Gessele II	5,761 routine emails	288.1	
2023	Gessele II	Detailed emails	75.5	
2023	Gessele II	MLL emails enumerated above		4.4
		<b>Totals:</b>	<b>4,539.10</b>	<b>1,034.30</b>

DATED this 10<sup>th</sup> day of October, 2023

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

JON M. EGAN, P.C.

*/s/ Jon M. Egan*

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