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10 *Attorneys for Plaintiffs*
11 *and the Proposed Class*

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 OAKLAND DIVISION
15

16 MAUDER and ALICE CHAO;
DEOGENESO and GLORINA PALUGOD;
17 and MARITZA PINEL, individually and on
behalf of all others similarly situated,

18 Plaintiffs,

19 vs.

20 AURORA LOAN SERVICES, LLC,

21 Defendant.
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Case No.: CV-10-3118-SBA

CLASS ACTION

DECLARATION OF ALI ABTAHI IN
SUPPORT OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND SERVICE
AWARDS

Date: January 13, 2015

Time: 1:00 p.m.

Place: Courtroom 210, 2nd Floor

Judge: Hon. Sandra B. Armstrong

1 I, Ali Abtahi, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

2 1. This declaration is based upon my personal knowledge.

3 2. I am an attorney currently licensed in good standing to practice law in the states of
4 California, Illinois, and Wisconsin. I am a partner at the law firm Abtahi Thigpen LLP, formerly
5 Abtahi Law Firm, which is Class Counsel in this action.

6 3. I have been actively engaged in the practice of law since 2003. In 2002, I graduated
7 cum laude from University of Wisconsin Law School and I was selected to participate in the
8 University of Wisconsin Law School's Consumer Law Litigation Clinic. In 1999, I obtained an
9 M.S. in epidemiology degree from Harvard School of Public Health. My graduate studies at
10 Harvard focused on the statistical analysis of risk factors for and causal determinant of human
11 disease.

12 4. Following law school, I worked for two years as a Legal Research Attorney initially
13 for Hon. A. James Robertson II and then Hon. Ronald E. Quidachay in the Law and Motion
14 Department of the San Francisco Superior Court. In 2004, I joined the law firm of Cotchett, Pitre &
15 McCarthy ("Cotchett") as an associate. My work at Cotchett focused on class actions and complex
16 litigation.

17 5. In 2007, I left Cotchett to start Abtahi Law Firm. In 2014, I started a partnership
18 with a former colleague and Abtahi Thigpen became the successor to Abtahi Law Firm. For ease of
19 reference, Abtahi Law Firm and Abtahi Thigpen are referred to hereinafter collectively as "Abtahi
20 Thigpen"

21 6. A copy of my firm's resume is attached as Exhibit A.

22 7. Abtahi Thigpen has worked on this litigation for four years. My firm's work on this
23 case has included all key aspects of the litigation, including initial intake, research and analysis of
24 claims, preparation and filing of complaint, preparation of subsequent pleadings, discovery,
25 mediation, and settlement. This case was extensively litigated and vigorously defended by Aurora.
26 This case, for example, involved repeated motion practice, in which Aurora sought dismissal of
27 Plaintiffs' claims.

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2 8. My firm was retained by Maritza Pinel to investigate and address Aurora’s unfair
3 loan practices. Ms. Pinel owned a residential property at 220 Valley Oak Lane, in Vallejo,
4 California. In 2009, Ms. Pinel fell behind on her loan. On or about October 29, 2009, Aurora
5 provided Ms. Pinel with a Workout Agreement. It required her to make six monthly payments of
6 \$1,625, which she did. She also made an extra payment of \$1,625.00 in April 2010. During the
7 Workout Agreement, the foreclosure was “dual tracked” with the sale date serially postponed. In
8 May 2010, unbeknownst to Ms. Pinel, Aurora foreclosed Ms. Pinel’s property. Aurora did not
9 provide Ms. Pinel a loan modification; nor was Ms. Pinel provided another workout option or cure
10 method during the term of the workout. She lost her home to foreclosure without an opportunity to
11 cure the arrearage on her loan.

12 9. Ms. Pinel devoted substantial time to assisting counsel on the litigation of the claims
13 and the settlement outcome for the class. After testifying at her deposition, she attended mediation
14 and then worked extensively with counsel throughout the settlement process.

15 10. Class Counsel’s and Ms. Pinel’s efforts led to an excellent settlement for the
16 common benefit of the Class. Class Counsel obtained a non-reversionary settlement fund that will
17 automatically be paid directly to class members. Moreover, the risk of non-recovery in this case
18 was substantial, particularly when viewed against the winding down of Aurora’s operations and the
19 heavily litigated nature of this case. Resolution only occurred after full briefing of class
20 certification and after numerous settlement attempts over the course of many months.

21 11. Abtahi Thigpen did not use the possibility of an incentive award to pressure Ms.
22 Pinel to accept the settlement. I am personally aware of the communications and written documents
23 outlining Abtahi Thigpen’s representation of Ms. Pinel, the proposed settlement relief, and its
24 fairness to the Class. Based upon these communications and documents, I believe Ms. Pinel
25 understood and agreed that her duty as a representative plaintiff was to serve the interests of the
26 Class as a whole, and that she would receive no special treatment compared to other Class
27 members. Ms. Pinel was informed of the possibility of a modest service award that would

1 recognize her efforts in bringing this litigation, cooperating with Class Counsel in discovery, and
2 discussing the best possible resolution of this case when viewed against risk factors. Ms. Pinel was
3 also informed that any such service award would be subject to the complete discretion of the Court
4 and that an award of this sort cannot be promised. To my knowledge, Ms. Pinel expected nothing
5 in particular in exchange for her service as a class representative, other than fair and customary
6 treatment in recognition of her service.

7 12. Class Counsel made clear to Ms. Pinel that she had the right to support, object to, or
8 comment on the settlement in this case without affecting the possibility of a service award. I am
9 informed and believe that Ms. Pinel's decision to sign and support the settlement had nothing to do
10 with the possibility of obtaining a service award.

11 **Fees and Expenses Incurred in This Litigation**

12 13. I rendered the Abtahi Thigpen's legal services in this case along with Idene Saam. I
13 was personally responsible for additional staffing and activity conducted on Plaintiffs' behalf by
14 support professionals at my firm, including overseeing all services rendered. Based on my
15 activities and oversight in this case, as well as my review of my firm's billing records maintained
16 in this case, I have personal knowledge of the time attorneys at my firm spent rendering services on
17 behalf of Plaintiffs, the hourly rates charged for those services, and the necessary costs incurred in
18 the normal course of this litigation.

19 14. Idene Saam was an associate at Abtahi Thigpen until October 2014. With my
20 supervision, Mr. Saam assisted in research, drafting of pleadings and motions, discovery, and
21 document review. This case involved substantial discovery and review of hundreds of thousands of
22 pages of documents that were produced by Aurora. Mr. Saam's responsibilities included review
23 and analysis of documents produced by Aurora.

24 15. Exhibit B attached hereto sets forth the time expended by attorneys at Abtahi
25 Thigpen from May 26, 2010, through November 2, 2014, split into ten categories based upon the
26 type of the work. Abtahi Thigpen's billing records are based on routine, contemporaneous
27 timekeeping in increments of one-tenth hour. I have reviewed Abtahi Thigpen's time entries to sort
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1 those reflected tasks into ten categories that generally include the following: case management;
 2 correspondence; discovery; document review; drafting pleading / documents; fact investigation;
 3 law and motion; legal research; meeting / conference; and settlement.

4 16. The rates of Abtahi Thigpen professionals who billed on this case are as follows:

5 Timekeeper	Position	Total Hours	Rate/Hour	Total
6 Ali Abtahi	Partner	508.5	\$550	\$279,675.00
7 Idene Saam	Associate	1131.1	\$375	\$424,162.50
8 Total		1,639.60	Avg: \$429.27	\$703,837.50

9 17. Based on my knowledge and experience, the rates charged by the attorneys and
 10 support professionals at my firm are the same as charged for non-contingent legal services by my
 11 law firm, and are within the range of rates normally and customarily charged in the Northern
 12 District of California by attorneys and support professionals of similar qualifications and
 13 experience in cases of this kind.

14 18. As the partner attorney assigned to this case at Abtahi Thigpen, fees for my time
 15 constitute just over 30% of the total fees that Abtahi Thigpen incurred in this case. Fees for Mr.
 16 Saam's time is just under 70% of the fees that Abtahi Thigpen incurred in this case. Biographies of
 17 all billers are provided below.

18 **Ali Abtahi** (Rate: \$550/hr; \$279,675.00 in total fees charged to case):

19 19. A summary of my experience and qualifications are set forth above in Paragraphs 2-5.
 20 My representative work in other consumer class actions includes: *Madanat v. First Data*
 21 *Corporation* (E.D.N.Y. Case No. 1:11-cv-00364-LDW-ETB); *Tofighbaksh v. Wells Fargo &*
 22 *Company* (San Francisco Sup. Ct. Case No. CGC-09-495450). I also have experience in complex
 23 litigation cases involving price manipulation and deceptive practices. My experience in this area
 24 includes: *Ohio Public Employees Retirement System v. McKesson Corporation* (N.D. Cal. Case No.
 25 3:13-cv-02000-SI) (lawsuit brought against McKesson Corporation for an alleged scheme to inflate
 26 the price of drugs prescribed for beneficiaries of the Ohio Public Employees Retirement System,
 27 State Teachers Retirement System of Ohio, and the Ohio Bureau of Workers' Compensation).

1 **Idene Saam** (Rate: \$375/hr; \$424,162.50 in total fees charged to this case):

2 20. Idene Saam worked as an associate in Abtahi Thigpen. Mr. Saam was admitted to
3 the California Bar in 2008. Mr. Saam’s practice focused on consumer class action, and cases
4 requiring quantitative analysis and presentation of scientific evidence. Prior to law school, Mr.
5 Saam received a Master of Science degree in Chemistry (with emphasis on pharmaceutical drug
6 synthesis) from the University of Illinois at Chicago.

7 21. In my judgment, and based on my years of experience, the number of hours
8 expended and the services performed by the attorneys and support professionals at my firm were
9 reasonable and expended for the benefit of Plaintiffs and the Class in this litigation. **However, in
10 light of the possibility of duplication of effort due to four law firms working on this case (even
11 though I have seen no indications of duplication), Class Counsel has decided to reduce each
12 firm’s lodestar by 20% for purposes of determining the reasonableness of Class Counsel’s fee
13 request. As a result, for purposes of the lodestar cross-check of the 30% fee sought, Abtahi
14 Thigpen has reduced its lodestar to \$563,070.**

15 22. Abtahi Thigpen also incurred expenses in the amount of \$1,740.70, as of November
16 2, 2014. These expenses include: filing fees, notary fees, postage and mailing expenses, copying
17 charges, and other case-related expenses, such discovery vendor charges, that commonly benefitted
18 Plaintiffs and the Class. Based on my knowledge and experience, all of these expenses were
19 necessary and reasonable, and incurred for the benefit of Plaintiffs and the Class in this litigation.
20 At the Court’s request, Abtahi Thigpen can provide a detailed report itemizing each expense item
21 charged to the case.

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23. The following table sets forth Abtahi Thipgen's expenses by category:

Filing Fees	\$696.00
Copying / document production	\$548.16
Legal Research	\$393.62
Postage / Mail	54.59
Other (Notary fees, travel)	\$48.33
Total	\$1,740.70

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

Dated: November 14, 2014

/s/ Ali Abtahi

Ali Abtahi

LOCAL RULE 5-1(i)(3) ATTESTATION

In accordance with Local Rule 5-1(i)(3), concurrence in the filing of this document has been obtained from each of the signatories and I shall maintain records to support this concurrence for subsequent production for the court if so ordered or for inspection upon request by a party.

DATED: November 14, 2014

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Thomas E. Loeser
Steve W. Berman (*Pro Hac Vice*)
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Exhibit A

ABTAHI THIGPEN LLP
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FIRM OVERVIEW

Abtahi Thigpen LLP (“Abtahi Thigpen”) is a boutique litigation firm with a diversified practice focusing on civil litigation. Based in the San Francisco Bay Area, we offer a full range of litigation services in high-stakes business litigation, class actions, products liability actions, and public health and environmental litigation.

Our attorneys have litigated individual lawsuits, class actions, and group actions in state and federal courts in California and other states. Our cases hold powerful corporations accountable for abusive and predatory practices.

What distinguishes Abtahi Thigpen is not only the quality of our practice, but also our commitment to our core value of providing service to the community. We have a longstanding commitment toward giving back through our pro bono practice, volunteer activities, and community service.

FIRM PRACTICES

We have experience in a wide range of civil litigation practice areas. Our attorneys litigate civil cases in state and federal courts in California and other states, either as sole counsel or in association with other counsel.

Business Litigation

Abtahi Thigpen has experience representing businesses in high-stakes business litigations. We also have experience in resolving smaller disputes efficiently and with an eye one on the bottom line. Our clients have included public pension plans, private businesses, and small business owners.

Class Actions

Abtahi Thigpen represents consumers and business owners in California and nationwide in a variety of important actions that challenge fraudulent and deceptive business practices. Our attorneys have taken a leading role in state and federal class actions involving consumer protection claims.

Product Defect

Abtahi Thigpen has experience in the prosecution of consumer litigation, including claims arising from defective products. Our attorneys have represented individuals in cases involving the pricing, fees, advertising, disclosures, warranties, sales, and marketing issues arising from the sale or lease of consumer products. We actively investigate product defect cases that pose serious health and injury risks to consumers.

Public Health and Environmental Litigation

Abtahi Thigpen's attorneys have significant educational and professional backgrounds in public health, life sciences, and physical sciences. As a result, we are uniquely positioned to offer litigation services in high-stake cases involving public health, healthcare, and environmental issues. Our attorneys have experience in a variety of public health issues ranging from the representation of elderly patients who were victims of physical abuse in care facilities to the representation of homeowners who purchased properties contaminated with oilfield-related byproducts.

Intellectual Property

Abtahi Thigpen has experience representing individuals and companies in connection with trademark and copyright disputes. Our attorneys have successfully registered trademarks before the United States Patent and Trademark Office and copyright claims before the United States Copyright Office. We have also successfully litigated disputes involving copyright and trademark disputes on behalf of clients in the entertainment industry.

Pro Bono

Abtahi Thigpen is committed to community service and providing pro bono legal services in issues of social importance. Each year, we provide pro bono services to individuals and charitable organizations that otherwise could not afford legal counsel. The firm's pro bono work includes:

Human Rights

Our attorneys are committed to representing and assisting individuals around the world who are victims of human rights abuses or face political persecution in their home countries. We have assisted refugees in Turkey with their applications for refugee status before the United Nations High Commissioner for Refugees. We continue to investigate potential avenues to seek justice for individuals who have suffered crimes against humanity, including political imprisonment, rape, and torture.

Charities and Non-Profit Organizations

Our attorneys assist several non-profit organizations. As one example, we helped establish Iraneda, a non-profit media company founded by prominent Iranian journalists, intellectuals, and human rights advocates who currently live in the United States and Europe. Iraneda's mission is to foster citizen journalism and increase public awareness on issues related to Iranian culture, history, politics, and current events. Following the establishment of Iraneda, we successfully represented the company in its application to obtain 501(c)(3) status from the IRS. Iraneda is believed to be the first organization of its kind to obtain charitable status.

Consumer and Community Advocacy

Our attorneys have provided legal services to lower income consumers who otherwise could not afford legal representation. We have handled on a pro bono basis a variety of consumer protection issues, housing issues, misrepresentation and fraud, mortgage foreclosure, and abusive debt collections practices. Examples of recent pro bono engagements in the area of consumer and housing advocacy include:

- Successful representation of homeowners in litigation against a real estate developer who attempted to take a narrow unpaved driveway on the clients' property and turn it into a roadway serving Defendant's residential subdivision development.
- Successful representation of a graduate student in litigation against a real estate vulture fund that purchased the student's rental unit at a foreclosure auction and subsequently locked out and forcibly barred the student from entering his residence without prior court order or judgment.
- Successful representation of a low-income farmer in obtaining a waiver from a county ordinance to add two modular homes to his property.
- Successful representation of a consumer who was deceptively pressured into purchasing non-cancellable career counseling and vocational "coaching" services that in fact provided no tangible benefits to consumers.
- Successful representation of a local artist in the registration of trademark and artistic work with the United States Patent and Trademark Office and the United States Copyright Office.

REPRESENTATIVE ENGAGEMENTS

Business Litigation

Ohio Public Employees Retirement System v. McKesson Corporation (N.D. Cal. Case No. 3:13-cv-02000-SI). Served as special counsel for the Ohio Attorney General in a lawsuit against McKesson Corporation for an alleged scheme to inflate the price of drugs prescribed for beneficiaries of the Ohio Public Employees Retirement System, State Teachers Retirement System of Ohio, and the Ohio Bureau of Workers' Compensation. The Ohio entities alleged that McKesson conspired to intentionally inflate the average wholesale price (AWP) markup factor applied to over 400 pharmaceutical, thereby causing the Ohio entities whose payments are based on the published AWP, to make substantial excess payments for those pharmaceuticals. \$18.325 million dollar settlement.

Sobhani v. Bamahang Productions, LLC (San Francisco Sup. Ct. Case No. CGC-09-495279). Represented the lead singer of Kiosk, an Iranian rock band that is widely popular among Iranians for its lyrics that provide political and social commentary, in a dispute with the band's former record label and promotional company. Successfully negotiated a settlement under which the production company transferred ownership of the band's promotion material, waived all trademark interests in the Kiosk name and logo, and waived all copyright interests in Kiosk's work.

Consumer Fraud and Deceptive Business Practices

Pinel v. Aurora Loan Services, LLC (N.D. Cal. Case No. 3:10-cv-03118-SBA). A class action challenging Aurora Loan Services, LLC's ("Aurora") mortgage servicing practices directed at financially distressed borrowers. Aurora offers distressed borrowers so-called "Workout Agreements" that are supposed to provide borrowers the opportunity to cure the arrearage in their loan payments while they are being considered for a loan modification.

Madanat v. First Data Corporation (E.D.N.Y. Case No. 1:11-cv-00364-LDW-ETB) (class counsel). Represent a nationwide class of 101,000 merchants in an action against First Data Corporation. The case challenges First Data's business practice of enforcing an optional liquidated damages provision against defaulting merchants who seek to terminate Point of Sale terminal leases.

Gabali v. OneWest Bank, FSB (N.D. Cal. Case No. 5:12-cv-02901-EJD). Represented a Stanford University instructor in a lawsuit challenging OneWest Bank, FSB. According the lawsuit, OneWest Bank induced the plaintiff to default on her monthly mortgage payments, and improperly made adverse credits reports and collected substantial late payment charges and foreclosure-related fees.

Tofighbaksh v. Wells Fargo & Company (San Francisco Sup. Ct. Case No. CGC-09-495450). Represented a borrower in an action challenging the manipulation the Cost of Savings Index (COSI). As alleged in the case, Wells Fargo artificially inflated the interest rate on borrowers' mortgage payments by changing the type of deposit accounts used to calculate the COSI.

Alavi v. Pacific Gas and Electric Company (JAMS File No. 1100060942). Represented a PG&E customer who was charged a so-called "minimum transportation charge" of approximately 10¢ per day, even when they had their gas services shut off by PG&E and, accordingly, did not utilize any natural gas services.

Product Defect

Peterson v. Mazda Motor of America (C.D. Cal. Case No. 8:13-cv-01972-DOC-AN). Represent a putative nationwide class in an action alleging breach of warranty claims involving Mazda vehicles equipped with a defective continuous variable valve timing ("VVT") assembly. As alleged in the lawsuit, when owners of defective Mazda vehicles present their vehicles for repair or replacement of the VVT system and resulting engine damage, Mazda's practice is to deny warranty claims.

Dajani v. Dell, Inc. (N.D. Cal. Case No. 3:08-cv-05285-SI). Represented an individual consumer in a breach of warranty action arising from an alleged defective printer ink management system that underestimated the level of ink remaining in inkjet cartridges. Settlement confidential.

Public Health and Environmental Litigation

Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)

We are actively investigating potential claims arising from the marketing of food products and other consumer products that contain chemicals known to cause cancer, birth defects, or reproductive toxicity.

Metcalf v. Crestwood Behavioral Health, Inc. (Alameda Case No. RG08370107). Represented an elderly woman in an elder abuse action against a nursing home and staff physician whose medical license was suspended by the California Medical Board.

ALI ABTAHI

Partner

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Ali Abtahi is a partner with Abtahi Thigpen LLP. Mr. Abtahi started the Abtahi Thigpen with the goal of pursuing impact cases focused on consumer, healthcare-related, and environmental litigation.

Experience: Mr. Abtahi has experience in consumer protection, public health, and environmental litigation. In recent years, Mr. Abtahi's practice has focused on the prosecution of class actions and complex business litigation. Mr. Abtahi has prosecuted class actions arising from abusive lending and foreclosure practices, automobile defects, and deceptive business practices.

Education: University of Wisconsin - Madison (B.S., political science and molecular biology, 1996); Harvard School of Public Health (M.S., epidemiology, 1999); University of Wisconsin Law School (J.D., 2001).

Clerkships: Legal Research Attorney, San Francisco Superior Court, Law and Motion Department (2002-2004, Hon. A James Robertson II, Hon. Ronald E. Quidachay).

Publications: "Preying on the Elderly: How Predatory Lenders Have Robbed Elderly Californians of Millions of Dollars," *Forum* (January/February 2006. 20-23); "The Effect of Population Safety Belt Usage Rates on the Number of Motor Vehicle-Related Fatalities," *Accident Analysis & Prevention* (Vol. 34 2002); "Consumer Law: Advances and Setbacks," *Advancing the Consumer Interest*" (Vol. 12, No. 2, Fall 2000); "Lack of Evidence for a Role of HTLV-I in the Occurrence of Subclinical HAM/TSP in the Miyazaki Cohort Study," *Journal of AIDS* (May 1, 2000. 24(1): 86-87).

Admissions: California; Illinois; Wisconsin; United States Court of Appeals for the Ninth Circuit; United States District Court for the Northern District of California; United States District Court for the Central District of California; United States District Court for the Eastern District of California; United States District Court for the Southern District of California; United States District Court for the Northern District of Illinois; United States District Court for the Western District of Wisconsin.

JORDANNA THIGPEN

Partner

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Jordanna Thigpen is a partner with Abtahi Thigpen LLP. Ms. Thigpen's practice is focused on complex business litigation, financial fraud and securities litigation, and transportation law. Ms. Thigpen also provides general business advice and counseling, and specializes in partnership disputes of all kinds.

Experience: Ms. Thigpen is a former business owner and a Small Business Commissioner for the City and County of San Francisco. She also served as Deputy Director and Executive Director of the San Francisco Taxi Commission from 2006-2009, where she established administration of the City's historic hybrid taxi program and secured the closure of a cab company accused of defrauding dozens of taxi driver and passenger victims. As a litigator, she has achieved over \$229 million in settlements and verdicts for her clients, including what is believed to be the largest settlement against an indenture trustee in United States history, in *In re Medical Capital Sec. Litig.*, 2010-ML-02145 DOC (RNBx) (C.D. Cal.) in 2013. Ms. Thigpen also works as a film producer in Hollywood, California.

Education: University of California at Davis (B.A., U.S. History 1999); University of San Francisco School of Law (J.D. 2004)

Clerkships: Legal Research Attorney, San Francisco Superior Court, Law and Motion Department (2004-2006), Hon. Ronald Quidachay, Hon. Peter Busch, Hon. James Warren (Ret.)

Public Service Awards: *The Recorder's* Women Leaders in Law (2012); Small Business Commissioner, City and County of San Francisco (2004-2008); Small Business Advocate, San Francisco Small Business Network (2008); Service Commendation, San Francisco Chief of Police Greg Suhr.

Admissions: California; District of Columbia; New York; United States Court of Appeals for the Ninth Circuit; United States District Court for the Northern District of California; United States District Court for the Central District of California; United States District Court for the District of Colorado; United States District Court for the District of Columbia.

Exhibit B

Attorney	Category	Time	Amount
Ali Abtahi	Case Management	47.45	\$26,097.50
Ali Abtahi	Correspondence	67.5	\$37,125.00
Ali Abtahi	Discovery	50	\$26,397.50
Ali Abtahi	Document Review	25.15	\$13,832.50
Ali Abtahi	Draft Pleading / Documents	57.15	\$31,432.50
Ali Abtahi	Fact Investigation	74.25	\$40,837.50
Ali Abtahi	Law and Motion	88.45	\$48,647.50
Ali Abtahi	Legal Research	63.7	\$35,035.00
Ali Abtahi	Meeting / Conference	39.9	\$21,945.00
Ali Abtahi	Settlement	1.25	\$687.50
	Subtotal Ali Abtahi	514.8	\$282,037.50
Idene Saam	Case Management	37.9	\$14,212.50
Idene Saam	Correspondence	196.7	\$73,762.50
Idene Saam	Discovery	117	\$43,875.00
Idene Saam	Document Review	350	\$131,250.00
Idene Saam	Draft Pleading / Documents	41.7	\$15,637.50
Idene Saam	Fact Investigation	31.5	\$11,812.50
Idene Saam	Law and Motion	136.8	\$51,300.00
Idene Saam	Legal Research	151.6	\$56,850.00
Idene Saam	Meeting / Conference	57.8	\$21,675.00
Idene Saam	Settlement	3.8	\$1,425.00
	Subtotal Idene Saam	1124.8	\$421,800.00
	TOTAL	1639.6	\$703,837.50