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CLERK OF SUPERIOR COURT
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR SPOKANE COUNTY

ULISES LOPEZ on behalf of himself and all
others similarly situated,

Plaintiff,

v.

HOBAN & ASSOCIATES, LLC a Washington
Limited Liability Company d/b/a COAST
PROPERTY MANAGEMENT, COAST
SCREENING SERVICES, COAST
COLLECTION SERVICES, COAST
MANAGEMENT COMPANY, INC. (CMC);
and CANYON BLUFFS INVESTORS VII-1,
LLC, a Washington limited liability company,

Defendants.

NO. 20-2-01929-32

**DECLARATION OF SHAYNE J.
SUTHERLAND IN SUPPORT OF
UNOPPOSED MOTION FOR AWARD
OF ATTORNEYS' FEES AND COSTS,
AND SERVICE AWARD**

Shayne J. Sutherland declares the following upon penalty of perjury, as provided for and
by the laws of the state of Washington:

1. I am the lead counsel of record for Plaintiff Ulises Lopez and the class in this
matter. I am of legal age and am competent to testify to and have personal knowledge of the
matters set forth herein.

2. I graduated from Gonzaga University School of Law with honors in 2011.

DECLARATION OF SHAYNE J. SUTHERLAND IN SUPPORT
OF PLAINTIFF'S UNOPPOSED MOTION FOR AWARD OF
ATTORNEYS' FEES AND COSTS, AND SERVICE AWARD -

Cameron Sutherland, PLLC
827 W. 1st Ave., Ste. 301
Spokane, WA 99201
(509) 315-4507

CCPY

1 3. I am a member in good standing admitted to practice by the bars of Washington
2 State and the United States District Court for the Eastern District of Washington.

3 4. I am an owner and managing partner at the law firm of Cameron Sutherland,
4 PLLC, which has operated since 2012.

5 5. The majority of my practice involves representing lower-income and
6 economically distressed individuals. The majority of my fees are earned on a contingency basis
7 under fee-shifting statutory provisions.

8 6. My firm's entire attorney fees in this matter were contingent upon the outcome.
9 As such, if Mr. Lopez did not prevail, or this matter did not settle, my firm would have put forth
10 hundreds of hours of work and received no payment.

11 7. I am a recognized authority in consumer protection and landlord-tenant practice
12 and have presented at multiple educational seminars to community organizations and attorneys
13 concerning consumer and landlord-tenant law.

14 8. I volunteer several weeks a year with the Inland Empire Legal Aid Program
15 (formerly known as the Spokane County Bar Association Volunteer Lawyers Consumer
16 Assistance Program) assisting and/or representing low-income individuals who appear in court
17 with consumer and debt collection defense issues.

18 9. I have previously been determined to be adequate class counsel in several actions
19 in the Washington State Courts and the United States District Court for Eastern Washington.
20 These matters include but are not limited to: *Daley v. Avenue5 Residential, LLC*, Spokane
21 Superior Court Cause No. 19-2-04154-32; *Miller v. Guenther Management, LLC*, Spokane
22 Superior Court Cause No. 20-2-02604-32; *Rainer v. Moland Management Company, Inc.*,
23 Spokane Superior Court Cause No. 20-2-03360-32; *Silver v. Rudeen Mgmt. Co., Inc.*, Spokane
24
25

1 Superior Court Cause No. 17-2-03103-2; *Morris v. FPI Management*, US District Court for the
2 Eastern District of Washington, Cause No. 2:19-CV-0128-TOR; *Dirk v. RC Schwartz &*
3 *Associates, Inc.*, Spokane Superior Court Cause No. 23-2-03085-32; and *Schultz v. Avenue5*
4 *Residential, LLC*, US District Court for the Eastern District of Washington, Cause No. 2:23-CV-
5 00088-SAB. All of those matters concerned tenant-side causes of action like the one here. My
6 co-counsel Brian Cameron has also been deemed adequate class counsel in numerous matters
7 before the state and federal courts of Washington.
8

9 10. My firm has presented landlord-tenant matters of first impression to the
10 Washington Court of Appeals on multiple occasions, in cases such as *Goodeill v. Madison Real*
11 *Est.*, 191 Wn. App. 88 (2015) and *Lewis v. Zanco*, 16 Wn. App. 2d 819 (2021), as well as to the
12 Washington Supreme Court in the matter of *Silver v. Rudeen Mgmt. Co., Inc.*, 197 Wn.2d 535,
13 538 (2021).
14

15 11. My and Mr. Cameron's current contingent hourly rate for class action work is six
16 hundred seventy-five dollars (\$675.00) per hour. Last year the Spokane County Superior Court
17 approved my and Mr. Cameron's class action contingency rate of six hundred twenty-five dollars
18 (\$625.00) per hour in the matter of *Dirk v. RC Schwartz & Associates, Inc.*, SCSC No. 23-2-
19 03085-32 at SNs 29, 38.
20

21 12. Class action litigation is complex and often highly contested. As a plaintiff's
22 attorney in these types of actions my firm is often pitted against some of the largest and most
23 successful defense firms in the state of Washington and other states. Many of these actions
24 require hundreds or thousands of hours of attorney time. If they are unsuccessful, as some of my
25 plaintiff client class action cases have been in the past, they result in no payment or greatly
reduced payment of attorney's fees and no recovery of costs.

1 13. I have investigated and am familiar with the rates charged by attorneys practicing
2 in Spokane, Washington and throughout Washington. A class action contingent rate of \$675.00
3 per hour for a firm principal and attorney with my qualifications and experience is within the
4 market rate for this area. I am aware of class action plaintiff firms that have been awarded \$1,180
5 per hour for partners, and \$710 per hour for associate attorneys with several less years of
6 experience in the western district of Washington. I am aware of another attorney who litigates in
7 this district and charges his corporate clients a **non-contingent fee rate** of \$745.00 per hour or
8 more to defend class actions.
9

10 14. My firm, Cameron Sutherland, PLLC has expended more than 520 hours on legal
11 services directly related to this case, including case analysis, research, discovery, contested
12 motion practice, and settlement negotiations. A true and correct copy of my contemporaneous
13 time records reflecting my representation of this matter is attached hereto as **Exhibit A**.
14

15 15. A reasonable rate for my paralegal legal assistant staff is \$195.00 per hour and
16 \$125.00 per hour for litigation support staff. I have investigated and am familiar with hourly
17 rates charged for paralegals and legal assistants in this region and my firm's rate is at or below
18 the market rate for such services. My firm's litigation support staff has accrued over 55 hours
19 (\$10,725) in billable time in this matter.
20

21 16. My firm incurred over \$5,000 in costs related to this litigation. If Mr. Lopez were
22 unsuccessful in this matter, those costs would not have been returned. My firm's costs are not
23 requested with this Motion as they have been subsumed into the \$466,667 total requested
24 attorneys' fees and costs award.
25

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served upon counsel of record at the address and in the manner described below a copy of the document to which this certificate is attached for delivery to the following:

<p>Eliot M. Harris, WSBA #36590 Maxwell B. Glasson, WSBA #51948 WILLIAMS, KASTNER & GIBBS PLLC 601 Union Street, Suite 4000 Seattle, WA 98101-2380 Email: eharris@williamskastner.com mglasson@williamskastner.com</p> <p><i>Attorneys for Defendants Hoban & Associates, LLC d/b/a Coast Property Management, Coast Screening Services, Coast Collection Services, Coast Management Company, Inc. (CMC), and Canyon Bluffs Investors VII-1, LLC</i></p>	<p><input type="checkbox"/> Via E-Service <input type="checkbox"/> Via Hand Delivery/Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via Electronic Mail <input type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Overnight Courier</p>
<p>Dalton J. Reynolds, WSBA #54055 WINSTON & CASHATT LAWYERS, PS 601 West Riverside Ave., Suite 1900 Spokane, WA 99201 Tel: (509) 838-6131 Fax: (509) 838-1416 Email: djr@winstoncashatt.com</p> <p><i>Co-Counsel for Defendant Canyon Bluffs Investors VII-1, LLC</i></p>	<p><input type="checkbox"/> Via E-Service <input type="checkbox"/> Via Hand Delivery/Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via Electronic Mail <input type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Overnight Courier</p>

DATED this 9th day of March 2026.

s/ Shayne J. Sutherland
Shayne J. Sutherland, WSBA #44593

EXHIBIT A

- CAMERON SUTHERLAND, PLLC

827 W. 1st Ave., Ste. 301
Spokane, WA 99201

CONTEMPORANEOUS TIMESHEET

Lopez, Ulises v. Coast, *et al.*

Shayne J. Sutherland

CLIENT	DATE	ACTIVITY	TIME	RATE	Total	TYPE
Lopez, Ulises	03/16/20	Rvw: Matter and evidence; Conf: with CL conc. LLT issues	1.1	675.00	742.50	Contingent
Lopez, Ulises	03/17/20	Rsch: Possible defendants and causes (1.4); Rvw: application materials and website (2.1); Conf: with CC conc. Case and rep (0.7)	4.2	675.00	2835.00	Contingent
Lopez, Ulises	03/19/20	Conf: with CL conc. Representation; Drft: agreements	1.3	675.00	877.50	Contingent
Lopez, Ulises	04/06/20	Conf: with KDM and staff conc. .257 lawsuit	0.5	675.00	337.50	Contingent
Lopez, Ulises	04/08/20	Rsch: Cause of action, case law, and evidence on file; Lit: Preserve website	6.9	675.00	4657.50	Contingent
Lopez, Ulises	04/10/20	Drft: Complaint; Comm: with CC conc. Complaint and case; Rsch: Business entities	7.1	675.00	4792.50	Contingent
Lopez, Ulises	04/13/20	Comm: with CC KDM conc. causes of action, adverse action notices; Drft: Edits to Complaint	4.4	675.00	2970.00	Contingent
Lopez, Ulises	04/20/20	Comm: with CC and staff conc. case	0.4	675.00	270.00	Contingent
Lopez, Ulises	07/05/20	Rvw: Case and evidence; Drft: discovery	3.2	675.00	2160.00	Contingent
Lopez, Ulises	07/06/20	Drft: First Set of Rogs RFPs and RFAs	7.4	675.00	4995.00	Contingent
Lopez, Ulises	07/07/20	Drft: Edits to Rogs and RFPs (3.4); RFAs (2.6)	6.0	675.00	4050.00	Contingent
Lopez, Ulises	07/08/20	Drft: Edits to RFAs; Comm: with staff conc. Svc	0.3	675.00	202.50	Contingent
Lopez, Ulises	07/15/20	Rvw: LTR from OC conc. Filing of Complaint; Comm: with staff conc. Filing	0.2	675.00	135.00	Contingent
Lopez, Ulises	07/17/20	Comm: with CC BC conc. Filing issue and staff tasks	0.3	675.00	202.50	Contingent
Lopez, Ulises	07/20/20	Rvw: NOA fr. OC; Rsch: OCs	0.6	675.00	405.00	Contingent
Lopez, Ulises	07/31/20	Rvw: Df. Request for extension of time; Comm: with CC conc. Extension	0.2	675.00	135.00	Contingent
Lopez, Ulises	08/01/20	Comm: email from OC conc. Discovery in possession of On Site	0.1	675.00	67.50	Contingent
Lopez, Ulises	08/11/20	Rvw: Dfs responses to RFAs and objections (0.5); Rsch: verify objections case law (1.3)	1.8	675.00	1215.00	Contingent
Lopez, Ulises	08/19/20	Rvw: Answer from Df Coast	0.2	675.00	135.00	Contingent
Lopez, Ulises	09/01/20	Rvw: Discovery answers fr Df. and file evidence	1.9	675.00	1282.50	Contingent
Lopez, Ulises	09/30/20	Rvw: Discovery answers of Defendant (0.4); Rsch: case law re: pre-certification objections (0.8)	1.2	675.00	810.00	Contingent

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DF: defendant
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PF: plaintiff

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Rsch: research
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CLIENT	DATE	ACTIVITY	TIME	RATE	Total	TYPE
Lopez, Ulises	10/09/20	Comm: with OC conc. Status conference; Drft: edits to JSR	0.3	675.00	202.50	Contingent
Lopez, Ulises	10/20/20	Rvw: Dfs first set of Rogs RFPs to PI	0.5	675.00	337.50	Contingent
Lopez, Ulises	10/26/20	Conf: with TB conc. Discovery responses and call with CL	0.6	675.00	405.00	Contingent
Lopez, Ulises	11/05/20	Rvw: Disc. responses; analyze file for steps going forward	0.7	675.00	472.50	Contingent
Lopez, Ulises	11/23/20	Rvw: Discovery questions and answers (1.1) ; Drft: finalize answers, production of documents and objections (4.2)	5.3	675.00	3577.50	Contingent
Lopez, Ulises	12/14/20	Conf: with TB conc. 26(i)s	0.3	675.00	202.50	Contingent
Lopez, Ulises	12/15/20	Rvw: Subpoena to On Site; Conf: with CC BC conc. Subpoena; Comm: with TB conc. Canyon Bluff Answer	0.5	675.00	337.50	Contingent
Lopez, Ulises	12/16/20	Rvw: Discovery answers and file (0.5); Comm: to Canyon Bluff OC conc. 26(i) (0.1); Conf: with CI conc. Discovery and case (0.5)	1.1	675.00	742.50	Contingent
Lopez, Ulises	12/22/20	Rvw: Discovery responses (0.3); Lit: Prep for and attend 26(i) (0.4); 26(i) (0.2); Rsch: Objections to discovery (2.1)	3.0	675.00	2025.00	Contingent
Lopez, Ulises	01/14/21	Drft: Motion, Memo and Dec. re: compel discovery	5.2	675.00	3510.00	Contingent
Lopez, Ulises	01/15/21	Drft: Finalize compel pleadings; Comm: with CC KDM conc. Compel	2.4	675.00	1620.00	Contingent
Lopez, Ulises	01/19/21	Conf: with TB conc. Svc. of motion	0.1	675.00	67.50	Contingent
Lopez, Ulises	01/26/21	Rvw: Dfs responses to Rogs and RFS and Supp Answers to RFAs	0.8	675.00	540.00	Contingent
Lopez, Ulises	02/08/21	Comm: with CC KDM conc. Discovery issues re Df	0.1	675.00	67.50	Contingent
Lopez, Ulises	02/10/21	Rvw: E SVC agreement; Comm: with TB conc. E SVC agreement	0.2	675.00	135.00	Contingent
Lopez, Ulises	03/08/21	Rvw: Discovery answers of Defendant Coast (2.8); Comm: Email to OC conc. 26(i) (0.3)	3.1	675.00	2092.50	Contingent
Lopez, Ulises	03/09/21	Lit: prep for conference re: discovery (1.1); Conf: With OC conc. discovery (0.3); Comm: Email to OC conc. conference (0.3)	1.7	675.00	1147.50	Contingent
Lopez, Ulises	03/12/21	Rvw: Dfs Motion and pleadings for out of state subpoena	0.5	675.00	337.50	Contingent
Lopez, Ulises	04/28/21	Rvw: Subpoena fr TX Court; Rsch: court rules	0.3	675.00	202.50	Contingent
Lopez, Ulises	06/15/21	Comm: with OC conc. On Site request for protective order	0.4	675.00	270.00	Contingent
Lopez, Ulises	06/25/21	Rvw: Drafted witness list (0.2)	0.2	675.00	135.00	Contingent
Lopez, Ulises	07/08/21	Rvw: Protection order	0.7	675.00	472.50	Contingent
Lopez, Ulises	07/09/21	Comm: with OC and CC conc. Protective order and scheduling	0.9	675.00	607.50	Contingent
Lopez, Ulises	07/13/21	Conf: with OC Miles Stewart and CC conc. protective order	0.8	675.00	540.00	Contingent
Lopez, Ulises	07/13/21	Lit: prep for and conference with OCs conc. protective order	0.3	675.00	202.50	Contingent
Lopez, Ulises	08/02/21	Rvw; protective order; Conf: with CC conc. protective order; Comm: email to Oc conc. protective order	0.5	675.00	337.50	Contingent

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Lopez, Ulises	08/03/21	Comm: with CC and OC conc. Protective order	0.2	675.00	135.00	Contingent
Lopez, Ulises	08/12/21	Comm: with TB conc. Discovery issues and scheduling order; Rvw: finalized PO	0.2	675.00	135.00	Contingent
Lopez, Ulises	08/23/21	Rvw: signed PO	0.1	675.00	67.50	Contingent
Lopez, Ulises	09/27/21	Comm: to/fr OC conc. Supplemental discovery and CSO issues	0.3	675.00	202.50	Contingent
Lopez, Ulises	09/28/21	Comm: PC with OC conc. CSO and discovery; Rvw: OnSite Docs	1.5	675.00	1012.50	Contingent
Lopez, Ulises	10/22/21	Drft: Motion and Supp pleadings re: Mt to Continue; Comm: with OC	0.6	675.00	405.00	Contingent
Lopez, Ulises	10/27/21	Comm: with OC conc. Stipulation to continue	0.2	675.00	135.00	Contingent
Lopez, Ulises	10/28/21	Drft: final edits to stipulated orders and prep for filing	0.4	675.00	270.00	Contingent
Lopez, Ulises	11/12/21	Rvw: OS supplemental production	0.2	675.00	135.00	Contingent
Lopez, Ulises	12/20/21	Rvw: File for missing discovery; Comm: to OC conc. 26(i)	1.7	675.00	1147.50	Contingent
Lopez, Ulises	01/03/22	Rvw: Discovery issues	0.9	675.00	607.50	Contingent
Lopez, Ulises	01/05/22	Lit: prep for and attend 26(i)	1.8	675.00	1215.00	Contingent
Lopez, Ulises	01/06/22	Rvw: Discovery answers; Conf: with CC conc. Case strategy	1.1	675.00	742.50	Contingent
Lopez, Ulises	01/13/22	Lit: prep witness lists: Comm: with TB conc. same and instructions	1.3	675.00	877.50	Contingent
Lopez, Ulises	02/01/22	Comm: With OC conc. discovery	0.1	675.00	67.50	Contingent
Lopez, Ulises	02/08/22	Conf: with CC and staff conc. Issues tasks; Comm: with CL re case	1.8	675.00	1215.00	Contingent
Lopez, Ulises	02/10/22	Drft: Continuance docs	0.5	675.00	337.50	Contingent
Lopez, Ulises	02/11/22	Comm: with OC conc. Continuance	0.2	675.00	135.00	Contingent
Lopez, Ulises	02/16/22	Rvw: new Court CSO	0.1	675.00	67.50	Contingent
Lopez, Ulises	03/08/22	Comm: emails from to OC conc. discovery	0.1	675.00	67.50	Contingent
Lopez, Ulises	03/28/22	Rvw: Supp Discovery responses; Conf: disc. Answers case with CC	2.6	675.00	1755.00	Contingent
Lopez, Ulises	04/11/22	Comm: to OC conc. OS discovery responses; Rvw: On Site docs; Conf: with CC conc. Discovery discrepancies	1.7	675.00	1147.50	Contingent
Lopez, Ulises	05/16/22	Comm: with OC conc. Continuance	0.2	675.00	135.00	Contingent
Lopez, Ulises	05/16/22	Rvw: CR 68 Offer of Judgment (0.1); Rsch: case law CR 68 and class actions (3.8); Conf: with CC conc. CR 68 (0.6)	4.5	675.00	3037.50	Contingent
Lopez, Ulises	05/20/22	Conf: with CL conc. CR 68 offer of judgment-rejected	0.4	675.00	270.00	Contingent
Lopez, Ulises	06/16/22	Lit: review discovery on file, prep for 26(i)	3.8	675.00	2565.00	Contingent
Lopez, Ulises	06/17/22	Lit: 26(i) conference; Comm: Email conc. requested discovery to OC	4.1	675.00	2767.50	Contingent
Lopez, Ulises	07/01/22	Rvw: response from OC conc. discovery (0.7); Conf: with CC conc. OC response and strategy (0.5)	1.2	675.00	810.00	Contingent
Lopez, Ulises	07/05/22	Rvw: discovery issues for conference (2.1)	2.1	675.00	1417.50	Contingent

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Lopez, Ulises	07/06/22	RsCh: case law discovery re class action and compels; Conf: with OC re: 26(i)	4.3	675.00	2902.50	Contingent
Lopez, Ulises	07/07/22	Rvw: Discovery on file and organize for motion (2.9); Drft: Motion to Compel (6.3)	9.2	675.00	6210.00	Contingent
Lopez, Ulises	07/08/22	Drft: Motion to Compel	4.3	675.00	2902.50	Contingent
Lopez, Ulises	07/10/22	Rvw: discovery file; Drft: 30(b)(6)	2.2	675.00	1485.00	Contingent
Lopez, Ulises	07/11/22	Drft: Motion to Compel	6.5	675.00	4387.50	Contingent
Lopez, Ulises	07/12/22	Drft: 30 (b)(6); Conf: with CC conc. 30(b)(6) and discovery issues	5.2	675.00	3510.00	Contingent
Lopez, Ulises	07/12/22	Drft: Compel	2.4	675.00	1620.00	Contingent
Lopez, Ulises	07/13/22	Drft: Compel	3.1	675.00	2092.50	Contingent
Lopez, Ulises	07/13/22	Rvw: email from OC (0.1)	0.1	675.00	67.50	Contingent
Lopez, Ulises	07/15/22	Drft: Compel	5.6	675.00	3780.00	Contingent
Lopez, Ulises	07/17/22	Conf: with OC conc. Discovery issues; Rvw: email from OC conc. Discovery issues	1.4	675.00	945.00	Contingent
Lopez, Ulises	07/18/22	Drft: Mt. to Continue; Rvw: Dfs motion and memo to deny class cert; RsCh: Mts to deny class cert case law	6.9	675.00	4657.50	Contingent
Lopez, Ulises	07/19/22	Drft: Mt. To continue and Compel, supp. docs; Rvw: Dfs objection to 30(b)(6)	8.2	675.00	5535.00	Contingent
Lopez, Ulises	07/20/22	Drft: Prop. Orders; Comm: with CC conc. Orders and pleadings	0.8	675.00	540.00	Contingent
Lopez, Ulises	07/28/22	Drft: Mt to seal and order	0.8	675.00	540.00	Contingent
Lopez, Ulises	08/09/22	Drft: 3rd Mt. to Continue docs; Comm: with OC conc. Continuance	1.2	675.00	810.00	Contingent
Lopez, Ulises	08/15/22	Rvw: Def.'s Response to Compel, verify authorities (2.3); Drft: Reply (6.1)	8.4	675.00	5670.00	Contingent
Lopez, Ulises	08/16/22	Rvw: Def.'s Motion for Protective Order, verify authority (1.5); RsCh: Protective order case law (3.1); Drft: Response (3.2)	7.8	675.00	5265.00	Contingent
Lopez, Ulises	08/17/22	Drft: Response re protective order	7.5	675.00	5062.50	Contingent
Lopez, Ulises	08/18/22	Drft: Response	2.9	675.00	1957.50	Contingent
Lopez, Ulises	08/19/22	Lit: Prep for hearing (3.2) Attend hearing (0.8)	4.0	675.00	2700.00	Contingent
Lopez, Ulises	08/23/22	Drft: proposed order (0.3); Conf: with CC and CL conc strategy moving forward (0.6)	0.9	675.00	607.50	Contingent
Lopez, Ulises	08/29/22	Conf: with CC and OC conc. 3rd party complaint	0.9	675.00	607.50	Contingent
Lopez, Ulises	08/30/22	Rvw: Drafted order re hearing; Comm: with CC and OC conc. Order	0.9	675.00	607.50	Contingent

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Lopez, Ulises	09/01/22	Rvw: Drft order from OC; Drft: revised order; Comm: with OC conc. Order	0.7	675.00	472.50	Contingent
Lopez, Ulises	09/01/22	Rvw: RAP rules and modify case law (1.1); Drft: Response (1.6)	2.7	675.00	1822.50	Contingent
Lopez, Ulises	09/07/22	Comm: With OC conc. order	0.2	675.00	135.00	Contingent
Lopez, Ulises	09/09/22	Comm: with OC conc. Mt. for PO; Rvw: Coast Supp. Disc. Answers; Conf: with CC conc. Production	1.6	675.00	1080.00	Contingent
Lopez, Ulises	09/28/22	Drft: Class Cert motion	4.2	675.00	2835.00	Contingent
Lopez, Ulises	10/12/22	Rvw: email from OC	0.1	675.00	67.50	Contingent
Lopez, Ulises	10/24/22	Rvw: amended witness list	0.3	675.00	202.50	Contingent
Lopez, Ulises	10/31/22	Drft: Motion for Class Cert	4.3	675.00	2902.50	Contingent
Lopez, Ulises	11/01/22	Drft: Mot. for class cert; Comm: with CL conc. Motion	3.7	675.00	2497.50	Contingent
Lopez, Ulises	11/02/22	Drft: motion for class cert and supporting docs	4.6	675.00	3105.00	Contingent
Lopez, Ulises	12/04/22	RsCh: Case law class cert	4.9	675.00	3307.50	Contingent
Lopez, Ulises	12/05/22	RsCh: Class Cert case law; Drft: Class cert pleadings	9.1	675.00	6142.50	Contingent
Lopez, Ulises	01/05/23	Drft: Edits to class cert motion and attendant pleadings; verify citations; Comm: with CL conc. motion	5.3	675.00	3577.50	Contingent
Lopez, Ulises	01/06/23	Drft: Edits to class cert motion and attendant pleadings	3.4	675.00	2295.00	Contingent
Lopez, Ulises	01/09/23	Comm: email TC with OC Stewart re certification schedule	0.6	675.00	405.00	Contingent
Lopez, Ulises	01/26/23	Comm: with OC conc. Scheduling	0.2	675.00	135.00	Contingent
Lopez, Ulises	02/06/23	Rvw: Pleadings of OC and file (0.5); RsCh: Case law in brief (0.4); Drft: Reply (4.6)	5.5	675.00	3712.50	Contingent
Lopez, Ulises	02/07/23	Drft: Final edits to reply and declaration	2.1	675.00	1417.50	Contingent
Lopez, Ulises	02/10/23	Lit: prep for hearing and attend hearing	1.6	675.00	1080.00	Contingent
Lopez, Ulises	02/13/23	Conf: with CC disc case BC (0.3); Kirk Miller (0.4); Drft: Prop0sed order (0.7)	1.4	675.00	945.00	Contingent
Lopez, Ulises	02/14/23	Conf: With BC conc. Strategy (0.4); Comm: Email to OC re proposed order (0.1)	0.5	675.00	337.50	Contingent
Lopez, Ulises	02/16/23	Comm: with OC conc. continuance; Conf: with CC/ CL conc. continuance and deadlines; Drft: edits to pleadings	0.9	675.00	607.50	Contingent
Lopez, Ulises	05/12/23	Comm: Emails with Counsel; Rvw: file for dates	0.2	675.00	135.00	Contingent
Lopez, Ulises	06/12/23	Rvw: discovery provided	3.5	675.00	2362.50	Contingent
Lopez, Ulises	06/13/23	Comm: with OC conc. 26i	0.1	675.00	67.50	Contingent
Lopez, Ulises	06/14/23	Comm: with OC conc. 26i	0.1	675.00	67.50	Contingent

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Lopez, Ulises	06/15/23	Rvw: Disclosure variances; Rsch: subclasses and notice issues	3.8	675.00	2565.00	Contingent
Lopez, Ulises	06/19/23	Rvw: Discovery responses re 26 (i)	2.1	675.00	1417.50	Contingent
Lopez, Ulises	06/19/23	Conf: with CC conc. class issues	0.6	675.00	405.00	Contingent
Lopez, Ulises	06/20/23	Lit: prep for and attend 26 (i)	2.5	675.00	1687.50	Contingent
Lopez, Ulises	06/22/23	Rvw: Order and comm. with OC and Court re: continuance	0.4	675.00	270.00	Contingent
Lopez, Ulises	06/27/23	Rvw: Ct Order	0.1	675.00	67.50	Contingent
Lopez, Ulises	06/29/23	Rvw: Class discovery information	3.2	675.00	2160.00	Contingent
Lopez, Ulises	07/25/23	Lit: prep for and attend 26(i) regarding production	0.8	675.00	540.00	Contingent
Lopez, Ulises	07/25/23	Rvw: Discovery docs from OC	2.1	675.00	1417.50	Contingent
Lopez, Ulises	08/11/23	Comm: With OC conc. discovery	0.3	675.00	202.50	Contingent
Lopez, Ulises	08/21/23	Conf: with CC and CL conc case and OC conc. discovery issues	0.8	675.00	540.00	Contingent
Lopez, Ulises	08/21/23	Rvw: Comms and information from Defendant re: class size and motions	0.6	675.00	405.00	Contingent
Lopez, Ulises	08/25/23	Comm: with OC conc. Continuance due to discovery issues and 3rd party complaint	0.1	675.00	67.50	Contingent
Lopez, Ulises	09/25/23	Comm: rvw email re new Judge	0.2	675.00	135.00	Contingent
Lopez, Ulises	10/10/23	Rvw: disc. issues: Comm: PC to OC conc. discovery	0.7	675.00	472.50	Contingent
Lopez, Ulises	10/16/23	Rvw: email from OC conc. ORCA discovery	0.2	675.00	135.00	Contingent
Lopez, Ulises	10/20/23	Comm: with OC conc. ORCA issue	0.1	675.00	67.50	Contingent
Lopez, Ulises	10/23/23	Lit: Prep for 26(i) conference, review discovery; Comm: PC with OC conc. Case	1.6	675.00	1080.00	Contingent
Lopez, Ulises	10/24/23	Comm: Email to OC regarding discovery issues	1.1	675.00	742.50	Contingent
Lopez, Ulises	10/25/23	Rvw: Comm from OC conc. Disc issues	0.4	675.00	270.00	Contingent
Lopez, Ulises	11/10/23	Comm: with OC conc. Class issues	0.2	675.00	135.00	Contingent
Lopez, Ulises	11/14/23	RsCh Class Notices; Rvw: evidence and facts on file	4.7	675.00	3172.50	Contingent
Lopez, Ulises	11/14/23	Lit: Prep for conf with OC (0.5); Comm: PC and email with OC conc. Class and notice (0.3); Drft: Notices (5.3)	6.1	675.00	4117.50	Contingent
Lopez, Ulises	11/28/23	Comm: with OC and CL conc. Continuance	0.2	675.00	135.00	Contingent
Lopez, Ulises	11/28/23	Lit: Rvw and approve stipulation to continue	0.3	675.00	202.50	Contingent
Lopez, Ulises	01/03/24	Comm: with OC and Court conc. Continuance	0.2	675.00	135.00	Contingent
Lopez, Ulises	01/29/24	Rvw: Third party complaint	0.5	675.00	337.50	Contingent
Lopez, Ulises	01/30/24	Rvw: Pleadings re pro hac vice	0.2	675.00	135.00	Contingent
Lopez, Ulises	02/08/24	Lit: Rvw: 3rd party pleadings to sever and to dismiss; Rsch: issues	2.3	675.00	1552.50	Contingent

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Lopez, Ulises	02/13/24	Comm: PC with CL conc. Update on case and road forward and representation	0.8	675.00	540.00	Contingent
Lopez, Ulises	02/14/24	Comm: with OC conc. meeting	0.1	675.00	67.50	Contingent
Lopez, Ulises	02/15/24	Lit: Prep for conf. with OC; Conf: with OC conc. Case, discovery, and potential settlement	0.4	675.00	270.00	Contingent
Lopez, Ulises	02/20/24	Conf: with CC BC conc. Case status and strategy	0.6	675.00	405.00	Contingent
Lopez, Ulises	02/29/24	Comm: with Ocs conc. Filing of docs for Mt. to Dismiss	0.2	675.00	135.00	Contingent
Lopez, Ulises	03/08/24	Rvw: Pleadings of Coast re: response to Dismiss and Sever	0.8	675.00	540.00	Contingent
Lopez, Ulises	03/11/24	Rvw: Discovery issue (1.3); Conf: with OC conc. Motion and settlement (0.4)	1.7	675.00	1147.50	Contingent
Lopez, Ulises	03/14/24	Rvw: Pleading for motion; Verify case law	0.4	675.00	270.00	Contingent
Lopez, Ulises	03/15/24	Lit: Attend hearing on motion to dismiss and sever	0.9	675.00	607.50	Contingent
Lopez, Ulises	04/30/24	Comm: with OC conc. Class member information; Conf: with BC conc. Discovery issues and sever issues	1.6	675.00	1080.00	Contingent
Lopez, Ulises	05/13/24	Rvw: Removal docs	0.3	675.00	202.50	Contingent
Lopez, Ulises	05/20/24	Rvw: Dfs supplemental witness disclosure	0.1	675.00	67.50	Contingent
Lopez, Ulises	05/22/24	Rvw: File: Comm. With OC conc. Case and discovery issues	0.8	675.00	540.00	Contingent
Lopez, Ulises	06/06/24	Rvw: Spreadsheet class member information (0.5); Conf: with BC conc. Missing information and road forward (0.6)	1.1	675.00	742.50	Contingent
Lopez, Ulises	06/11/24	Rvw: Evidence of class members; Comm: with OC conc. Issues; Conf: with CC conc settlement	3.1	675.00	2092.50	Contingent
Lopez, Ulises	06/11/24	Conf: with OC conc. Discovery issues; Rvw: new spreadsheet	0.9	675.00	607.50	Contingent
Lopez, Ulises	06/18/24	Rvw: File information; Conf: with CL conc settlement offer; Comm: PC and email to class administrator conc. matter	3.2	675.00	2160.00	Contingent
Lopez, Ulises	06/18/24	Drft: Settlement offer (0.9); Conf: with BC conc. Settlement offer (1.1)	2.0	675.00	1350.00	Contingent
Lopez, Ulises	07/02/24	Conf: with OC; Prep for Conference	0.7	675.00	472.50	Contingent
Lopez, Ulises	07/02/24	Comm: with OC conc. Case and mediation	0.3	675.00	202.50	Contingent
Lopez, Ulises	07/08/24	Comm: Email to OC; Rvw: case scheduling order	0.2	675.00	135.00	Contingent
Lopez, Ulises	07/11/24	Comm: with OC conc. Continuance	0.2	675.00	135.00	Contingent
Lopez, Ulises	07/15/24	Comm: with Mediator conc. Dates	0.3	675.00	202.50	Contingent
Lopez, Ulises	07/16/24	Rsch: Prior mediators and results; Comm: with Mediation office and OC conc. mediation	1.3	675.00	877.50	Contingent

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Lopez, Ulises	07/16/24	Comm: Email to and from OC; Court email	0.3	675.00	202.50	Contingent
Lopez, Ulises	07/16/24	Comm: with OC conc. continuance	0.3	675.00	202.50	Contingent
Lopez, Ulises	07/22/24	Rvw: Order of Court on Continuance, new CSO	0.2	675.00	135.00	Contingent
Lopez, Ulises	07/25/24	Comm: with Louis Peterson conc. Mediation	0.2	675.00	135.00	Contingent
Lopez, Ulises	07/30/24	Rvw: Real Page Motion for Judgment on Pleadings	0.7	675.00	472.50	Contingent
Lopez, Ulises	09/09/24	Lit: prep for mediation call (0.6); Conf: with Mediator conc. Mediation (0.5); Comm: PC to CL conc. Mediation (0.5); Pc to OC conc. Case and mediation (0.2)	1.8	675.00	1215.00	Contingent
Lopez, Ulises	09/17/24	Conf: with OC conc. Case (0.3); with CC and CL conc strategy (1.5)	1.8	675.00	1215.00	Contingent
Lopez, Ulises	09/19/24	Comm: emails and PC to CL conc. Mediation; PC with OC conc. Resetting mediation date	0.9	675.00	607.50	Contingent
Lopez, Ulises	09/19/24	Comm: with OC and Mediation conc. Mediation: Lit: prep for mediation; Drft: mediation statement	3.3	675.00	2227.50	Contingent
Lopez, Ulises	10/02/24	Rvw: Calendar and comms from Peterson; Email to OCs conc. mediation	0.2	675.00	135.00	Contingent
Lopez, Ulises	10/02/24	Comm: with Ocs conc. New mediation dates	0.2	675.00	135.00	Contingent
Lopez, Ulises	10/03/24	Comm: Email from OC; Conf: with CC conc. Strategy re: case deadlines, mediation, dates	0.7	675.00	472.50	Contingent
Lopez, Ulises	10/04/24	Comm: email to administrator	0.1	675.00	67.50	Contingent
Lopez, Ulises	10/15/24	Drft: Motion to Continue and Proposed Order; Comm: email to OC conc. Continuance, with CL conc. same	1.0	675.00	675.00	Contingent
Lopez, Ulises	10/15/24	Drft: Motion and Dec. to continue; Comm: with Ocs conc. Mediation and continuance	1.3	675.00	877.50	Contingent
Lopez, Ulises	10/22/24	Comms: with OCs conc. Continuance of trial date; Conf: with CC conc. scheduling	0.6	675.00	405.00	Contingent
Lopez, Ulises	10/22/24	Comm: with CL conc. Continuance	0.1	675.00	67.50	Contingent
Lopez, Ulises	10/23/24	Comm: with OC	0.1	675.00	67.50	Contingent
Lopez, Ulises	10/29/24	Rvw: witness filing	0.2	675.00	135.00	Contingent
Lopez, Ulises	11/06/24	Comm: with OC conc. Mediation date	0.1	675.00	67.50	Contingent
Lopez, Ulises	11/12/24	Comm: with OC conc. Mediation date	0.1	675.00	67.50	Contingent
Lopez, Ulises	11/13/24	Comm: with Mediator and OCs conc. mediation	0.3	675.00	202.50	Contingent
Lopez, Ulises	12/02/24	Comm: with OCs conc. Mediation	0.1	675.00	67.50	Contingent
Lopez, Ulises	12/12/24	Comm: with OC, Mediator, CL conc. Mediation dates	0.3	675.00	202.50	Contingent

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Lopez, Ulises	01/14/25	Comm: with OC conc. Case	0.2	675.00	135.00	Contingent
Lopez, Ulises	01/15/25	Conf: with OC conc. Case	0.2	675.00	135.00	Contingent
Lopez, Ulises	01/17/25	Comm: PC with OC conc. Mediation (0.2); Conf: with CC BC conc. Lopez strategy (0.6)	0.8	675.00	540.00	Contingent
Lopez, Ulises	01/27/25	Comm: with OC conc. Mediation and trial issues	0.4	675.00	270.00	Contingent
Lopez, Ulises	02/06/25	Conf: with CC conc. case	1.2	675.00	810.00	Contingent
Lopez, Ulises	02/06/25	Conf: with CL conc. Facts; Drft: LTR	3.6	675.00	2430.00	Contingent
Lopez, Ulises	02/07/25	Rvw: comm from OC; Conf: with CC conc. Continuance and discovery	0.6	675.00	405.00	Contingent
Lopez, Ulises	02/10/25	Rvw: Continuance pleadings; comms with Court	0.2	675.00	135.00	Contingent
Lopez, Ulises	02/11/25	Conf: with CC conc. Response to Motion	0.4	675.00	270.00	Contingent
Lopez, Ulises	02/12/25	Drft: Email to OC; Rvw: records re: discovery	2.4	675.00	1620.00	Contingent
Lopez, Ulises	02/13/25	Rvw: Correspondence and records; Drft: Email to OC conc. Status and offer; Conf: with CC BC conc. Offer and case	3.6	675.00	2430.00	Contingent
Lopez, Ulises	03/03/25	Lit: Rvw evidence; Comm: with OC conc. case	0.9	675.00	607.50	Contingent
Lopez, Ulises	03/13/25	Comm: with CL, OC, Mediator conc. Mediation dates	0.8	675.00	540.00	Contingent
Lopez, Ulises	03/21/25	Comm: with Mediator conc. Mediation; Rvw: mediation docs	0.3	675.00	202.50	Contingent
Lopez, Ulises	05/09/25	Rvw: File for evidence; Conf: with CL conc. Mediation; Rsch: Other case settlements	7.2	675.00	4860.00	Contingent
Lopez, Ulises	05/10/25	Rvw: evidence and pleadings on file; Drft: Mediation LTR	6.4	675.00	4320.00	Contingent
Lopez, Ulises	05/11/25	Drft: Mediation LTR; Lit: Prep for mediation	7.4	675.00	4995.00	Contingent
Lopez, Ulises	05/12/25	Drft: Mediation LTR; Lit: Prep for mediation; Conf: with CL conc. Mediation; Rvw: Position of Defendant' Conf. with CC conc strategy	9.4	675.00	6345.00	Contingent
Lopez, Ulises	05/13/25	Conf: with BC conc. Case and mediation	2.2	675.00	1485.00	Contingent
Lopez, Ulises	05/14/25	Lit: Prep for mediation	8.4	675.00	5670.00	Contingent
Lopez, Ulises	05/15/25	Lit: Prep for and attend mediation	9.9	675.00	6682.50	Contingent
Lopez, Ulises	06/04/25	Drft: Settlement Agreement	2.8	675.00	1890.00	Contingent
Lopez, Ulises	06/10/25	Drft: Sett. Agreement, Class Orders and Notices,	7.8	675.00	5265.00	Contingent
Lopez, Ulises	06/11/25	Comm: PC with OC conc. Settlement docs; Drft: settlement docs	3.1	675.00	2092.50	Contingent
Lopez, Ulises	06/12/25	Drft: finish settlement draft docs	8.5	675.00	5737.50	Contingent
Lopez, Ulises	06/13/25	Comm: with OP conc. pleadings	0.4	675.00	270.00	Contingent
Lopez, Ulises	06/24/25	Rvw: Email from Court: Comm: with OC conc. Trial continuance	0.2	675.00	135.00	Contingent
Lopez, Ulises	12/16/25	Rvw: Dfs edits fr. to preapproval docs	0.6	675.00	405.00	Contingent

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Lopez, Ulises	12/31/25	Drft: Prelim Appr. docs	2.1	675.00	1417.50	Contingent
López, Ulises	01/08/26	Comm: with OC and Court conc. Prelim approval; Drft: Memo in support; Rsch: issues	7.2	675.00	4860.00	Contingent
Lopez, Ulises	01/09/26	Drft: Memo and declaration in support	8.8	675.00	5940.00	Contingent
Lopez, Ulises	01/13/26	Comm: with OC and Court conc. preapproval	0.3	675.00	202.50	Contingent
Lopez, Ulises	01/16/26	Rvw: changes to Settlement agreement; Comm: with OC and Class administrator conc. case	0.9	675.00	607.50	Contingent
Lopez, Ulises	01/23/26	Drft: final edits to pleadings; comm: with Court OC and Class Admin regard. Settlement and preapproval	4.2	675.00	2835.00	Contingent
Lopez, Ulises	02/04/26	Comm: with Court and OC conc. Fairness hearing dates; Drft: edits to Order	0.9	675.00	607.50	Contingent
Lopez, Ulises	02/09/26	Comms: with Class Admin and OC conc. Class data; Rvw: class data	0.4	675.00	270.00	Contingent
Lopez, Ulises	03/05/26	Rsch: Fee Petitions re class action case law; Drft: Memo and Declaration in Support	9.3	675.00	6277.50	Contingent
Lopez, Ulises	03/06/26	Drft: edits to memo and declaration and exhibit	5.2	675.00	3510.00	Contingent
Lopez, Ulises	03/07/26	Drft: Petition and exhibits	5.1	675.00	3442.50	Contingent
Lopez, Ulises	03/08/26	Drft: Edits to Memo and supporting docs	5.6	675.00	3780.00	Contingent
Lopez, Ulises	03/09/26	Drft: Edits to Atty fee motion; Conf: with CC and staff conc. Pleadings and filings	6.1	675.00	4117.50	Contingent
TOTAL			483.7	675.00	\$326,497.50	

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