

1 John P. Kristensen (SBN 224132)  
David L. Weisberg (SBN 211675)  
2 Christina M. Le (SBN 237697)  
3 **KRISTENSEN WEISBERG, LLP**  
12450 Beatrice Street, Suite 200  
4 Los Angeles, California 90066  
5 Telephone: 310-507-7924  
6 Fax: 310-507-7906  
7 john@kristensenlaw.com  
david@kristensenlaw.com  
christina@kristensenlaw.com

8  
9 Todd M. Friedman (SBN 216752)  
Adrian R. Bacon (SBN 280332)  
10 **LAW OFFICES OF TODD M. FRIEDMAN, P.C.**  
21550 Oxnard Street, Suite 780  
11 Woodland Hills, CA 91367  
12 Telephone: (216) 220-6496  
13 Facsimile: (866) 633-0028  
tfriedman@attorneysforconsumers.com  
14 abacon@attorneysforconsumers.com

15 *Attorneys for Plaintiff and all others similarly  
situated*

16  
17 **THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

18 LISA KIM, individually on behalf of  
19 herself and all others similarly  
situated,

20 Plaintiff,

21 vs.

22  
23 TINDER, INC., a Delaware  
24 corporation; MATCH GROUP, LLC,  
25 a Delaware limited liability company;  
MATCH GROUP, INC., a Delaware  
26 corporation; and DOES 1 through 10,  
27 inclusive, and each of them,

28 Defendants.

) Case No.: 2-18-cv-03093

) **PLAINTIFF LISA KIM’S  
) NOTICE OF MOTION &  
) MOTION FOR ATTORNEYS’  
) FEES COSTS AND INCENTIVE  
) AWARDS**

) Date: June 17, 2019  
) Time: 1:30 p.m.  
) Courtroom: 7A  
) Hon. John F. Walter

1 **TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR**  
2 **ATTORNEYS OF RECORD:**

3 **PLEASE TAKE NOTICE** that on June 17, 2019, at 1:30 p.m., in  
4 Department 7A of the United States District Court for the Central District of  
5 California, located at 350 West First Street, Los Angeles, California 90012,  
6 plaintiff Lisa Kim (“Plaintiff”), for herself and other similarly situated, will move  
7 this Court for an order granting preliminary approval of the class action settlement  
8 and certification of the settlement class as detailed in Plaintiff’s memorandum of  
9 points and authorities.

10 This Motion is based upon this Notice, the accompanying Memorandum of  
11 Points and Authorities, the declaration and exhibits thereto, the Complaint, all  
12 other pleadings and papers on file in this action, and upon such other evidence and  
13 arguments as may be presented at the hearing on this matter.

14  
15 Dated: April 22, 2019

Respectfully submitted,

16 By:

17 /s/ Todd M. Friedman

18 Todd M. Friedman (SBN 216752)  
19 Adrian R. Bacon (SBN 280332)  
20 **LAW OFFICES OF TODD M. FRIEDMAN,**  
21 **P.C.**

22 John P. Kristensen (SBN 224132)  
23 David L. Weisberg (SBN 211675)  
24 Christina M. Le (SBN 237697)  
25 **KRISTENSEN WEISBERG, LLP**

26 *Attorneys for Plaintiff and all other*  
27 *similarly situated.*  
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**CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 7-3**

Plaintiff’s counsel certifies that prior to filing the instant motion, the parties, through counsel, met and conferred pertaining to the subject matter of the instant motion. Specifically, Plaintiff’s counsel Adrian R. Bacon and Defendant’s counsel Donald Brown met and conferred telephonically regarding the subject and content of the Motion on April 19, 2019, in fulfillment of Local Rule 7-3. Defendant indicated that it would not oppose Plaintiff’s Motion.

Dated: April 22, 2019

Respectfully submitted,

By: /s/ Todd M. Friedman

Todd M. Friedman (SBN 216752)  
Adrian R. Bacon (SBN 280332)  
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Christina M. Le (SBN 237697)  
**KRISTENSEN WEISBERG, LLP**

*Attorneys for Plaintiff and all others  
similarly situated.*

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**TABLE OF AUTHORITIES**

**Cases**

*In re Washington Pub. Power Supply Sys. Sec. Litig.*, 19 F.3d 1291, 1299 (9th Cir. 1994)..... 17

*Bellinghausen v. Tractor Supply Co.*, 306 F.R.D. 245 (N.D. Cal. Mar. 20, 2015).....24

*Blum v. Stevenson*, 465 U.S. 886 (1994).....22

*Briggs v. United States*, Case No. C 07-05760 WHA, 2010 WL 1759457 (N.D. Cal. Apr. 30, 2010) ..... 13

*Carter v. City of Los Angeles*, 224 Cal.App.4th 808 (2014)..... 14

*Cullinane v. Uber Technology, Inc.* 893 F.3d 53 (1st Cir. 2018) .....6

*Davis v. City and County of San Francisco*, 976 F.3d 1536 (9th Cir. 1992).....22

*Dennis v. Kellogg Co.*, 2010 WL 4285011 (S.D. Cal. Oct. 14, 2010)..... 11, 13, 14

*Di Giacomo v. Plains All Am. Pipeline*, 2001 U.S. Dist. LEXIS 25532 (S.D. Tex. Dec. 18, 2001) ..... 22

*Dukes v. Wal-Mart Stores, Inc.*, 603 F.3d 571 ..... 14

*Fischel v. Equit. Life Assurance Soc’y*, 307 F.3d 997 (9th Cir. 2002)..... 19, 21

*Glass v. UBS Fin. Servs.*, 2007 U.S. Dist. LEXIS 8476 (N.D. Cal. Jan. 26, 2007)..... 19

*Hanlon v. Chrysler Corp.*, 150 F.3d 1011 (9th Cir. 1998).....3, 10, 11, 19

*Hartless v. Clorox Co.*, 273 F.R.D. 630 (S.D. Cal. 2011) .....23

*Hensley v. Eckerhart*, 461 U.S. 424 (1983) ..... 13

*Hopson v. Hanesbrands Inc.*, Case No. CV-08-0844 EDL, 2009 WL 928133, at \*11 (N.D. Cal. Apr. 3, 2009) ..... 13

*In re Activision Sec. Litig.*, 723 F. Supp. 1373 (N.D. Cal. 1998)..... 12

*In re Beverly Hills Fire Litigation*, 639 F. Supp. 915 (E.D. Ky. 1986) .....22

*In re Bluetooth Headset Prods. Liab. Litig.*, 654 F.3d 935 (9th Cir. 2011)..... 10

*In re EasySaver Rewards Litig.*, 921 F. Supp. 2d 1040, 1049 (S.D. Cal. 2013)..... 14

*In re Global Crossing Sec. and ERISA Litig.*, 225 F.R.D. 436, 460 (E.D. Pa. 2000) ..... 14

*In re Immune Response Sec. Litig.*, 497 F. Supp. 2d 1166 (S.D. Cal. 2007) .....23

*In re Media Vision Tech. Sec. Litig.*, 913 F. Supp. 1362 (N.D. Cal. 1996) .....23

*In re Mego Fin’l Corp. Sec. Litig.*, 213 F. 3d 454, 459 (9th Cir. 2000)..... 14

*In re Mercury Interactive Corp.*, 618 F.3d 988 (9th Cir. 2010)..... 10

1	<i>In re Omnivision Techs.</i> , 559 F. Supp. 2d 1036 (N.D. Cal. 2007).....	12, 13, 15, 17, 18
2	<i>In re Omnivision Techs.</i> , 559 F. Supp. 2d 1036, 1047 (N.D. Cal. 2007).....	12
3	<i>In re Online DVD-Rental Antitrust Litigation</i> , 779 F.3d 934 (9th Cir. Feb. 27, 2015) .....	24
4	<i>In re Toys R Us – Delaware, Inc. – Fair and Accurate Credit Transactions Act (FACTA) Litigation</i> , 295 F.R.D. 438 (C.D. Cal. Jan. 17, 2014).....	24
5	<i>In re Washington Pub. Power Supply Sys. Sec. Litig.</i> , 19 F.3d 1291 (9th Cir. 1994).....	17
6	<i>Kerr v. Screen Extras Guild, Inc.</i> , 526 F.2d 67, 70 (9th Cir. 1975).....	19, 20
7	<i>Lane v. Facebook, Inc.</i> , 709 F.3d 791, 793 (9th Cir. 2013).....	14
8	<i>Lundell v. Dell, Inc.</i> , CIVA C05-3970 JWRS, 2006 WL 3507938 (N.D. Cal. Dec. 5, 2006) ...	11
9	<i>McGill v. Citibank, N.A.</i> , 2 Cal.5th 945 (2017) .....	5, 21
10	<i>Milliron v. T-Mobile USA, Inc.</i> , 2009 WL 3345762 (D.N.J. Sept. 14, 2009).....	11
11	<i>Mills v. Electric Auto-Lite Co.</i> , 396 U.S. 375, 391-392 (1970) .....	23
12	<i>Molski v. Gleich</i> , 318 F.3d 937, 954-55 (9th Cir. 2003).....	14
13	<i>Nachshin v. AOL, LLC</i> , 663 F.3d 1034, 1038 (9th Cir. 2011).....	14
14	<i>National Rural Tele. Coop. v. DIRECTV, Inc.</i> , 221 F.R.D. 523, 527 (C.D. Cal. 2004) .....	14
15	<i>O'Connor v. Uber Technologies, Inc.</i> , 904 F.3d 1087 (9 <sup>th</sup> Cir. 2018) .....	15
16	<i>Officers for Justice v. Civil Serv. Comm'n of City &amp; Cnty. of San Francisco</i> , 688 F.2d 615, 625 (9th Cir. 1982).....	11
17	<i>POM Wonderful, LLC v. Purely Juice, Inc.</i> , 2008 WL 4351842 (C.D. Cal 2008) .....	23
18	<i>Sandoval v. Tharaldson Emp. Mgmt., Inc.</i> , 2010 WL 2486346 (C.D. Cal. June 15, 2010) .....	11
19	<i>Serrano v. Unruh</i> , 32 Cal. 3d 621 (1982) .....	22
20	<i>Shames v. Hertz Corp.</i> , Case No. 07-CV-2174-MMA WMC, 2012 WL 5392159 at *13 (S.D. Cal. Nov. 5, 2012).....	13
21	<i>Staton v. Boeing Co.</i> , 327 F.3d 938 (9th Cir. 2003).....	10
22	<i>Van Vranken v. Atlantic Richfield Co.</i> , 901 F. Supp. 294, 298 (N.D. Cal. 1995).....	22
23	<i>Vizcaino v. Microsoft Corp.</i> , 290 F.3d 1043 (9th Cir. 2002).....	12, 13, 15, 17, 18, 19
24	<b>Statutes</b>	
25	<i>Cal. Bus. &amp; Prof. Code</i> §§ 17200, et seq. ....	5, 6, 14, 15, 16, 17, 22
26	<i>Cal. Civ. Code</i> §§ 51, et seq.....	5, 14, 15, 16, 17
27	<b>Other Authorities</b>	

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2 McLaughlin on Class Actions (8th ed.) .....11  
Federal Judicial Center, Manual for Complex Litigation (4th Ed. 2004) .....13  
Federal Judicial Center, Manual for Complex Litigation, § 27.71 .....13  
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2 **MEMORANDUM OF POINTS AND AUTHORITIES**

3 **I. INTRODUCTION**

4 Plaintiff moves the Court for an award of attorneys' fees, costs and  
5 incentive payment as part of this preliminarily approved class action settlement  
6 (see Dkt. No. 60 and 62) between plaintiff Lisa Kim ("Plaintiff") and defendants  
7 Tinder, Inc., Match Group, LLC and Match Group, Inc., (hereinafter referred to as  
8 "Defendants" or "Tinder").<sup>1</sup> Defendant does not oppose this Motion. The  
9 Settlement Agreement provides for a substantial financial benefit to the Class  
10 Members, of which there are an estimated 230,000.<sup>2</sup> The estimated Settlement  
11 benefit to the Class is \$23 million, which is comprised of three components: 1)  
12 \$11.5 million in guaranteed Super Likes under the universal participation  
13 component (not requiring submission of claims), 2) \$5.75 million in potential cash  
14 or cash-equivalent benefits is available to every Member who submits a claim, and  
15 3) an injunction providing for public injunctive relief against Defendants on behalf  
16 of the Class and all members of the California public, which is estimated at a value  
17 to Class Members of at least \$5.75 million. By any means this is a substantial  
18 settlement, insofar as it provides for recovery for a wide scope of consumers, who  
19 will receive meaningful relief, as well as an end to an allegedly unlawful practice.  
20 This robust Settlement on behalf of hundreds of thousands of consumers was  
21 achieved after hard-fought litigation, arm's length negotiations, and the careful and  
22 skilled efforts of Class Counsel.

23 The Settlement benefits that will be provided to Class Members will be  
24 completely and separately recoverably by all Class Members from the attorneys'

25 <sup>1</sup> Collectively referred to as the "Parties."

26 <sup>2</sup> Notice was provided to over 240,000 consumers' email addresses, based on  
27 geolocation data that suggested California residency (a requisite of Unruh Act and  
28 UCL standing). A small percentage of these individuals might not be Class  
Members, but it was important to ensure that if anything, the Notice was slightly  
over-inclusive rather than risk being under-inclusive.

1 fees that are requested herein. In deciding this Motion, the Court should give  
2 special consideration to the following: 1) Class Counsel negotiated the fees in this  
3 case completely separate and apart from any Class Member recovery, meaning that  
4 the only part which would benefit from a reduction of the fees would be Defendant,  
5 the one who is alleged to have violated the law and who has already agreed to the  
6 reasonableness of the fees requested herein; 2) As the Court noted in its Order  
7 Granting Preliminary Approval (Dkt. No. 60), the amount of attorney's fees sought  
8 was negotiated only after the Class Members' portion of the settlement had been  
9 negotiated fully, and with the oversight of one of the most respected neutral  
10 mediators in Southern California, meaning there is an absence of evidence of  
11 collusion (Dkt. No. 60 at Pg 12), and 3) the settlement benefits to Class Members  
12 are meaningful and robust, which the Court already found to be fair and adequate  
13 under the requirements of Rule 23(e) (Dkt. No. 60, and 62).

14 On March 1, 2019, the Court granted preliminary approval of the Settlement  
15 and its terms enumerated above, observing, that the Settlement appeared  
16 reasonable and disclosed no grounds to doubt its fairness. Dkt. No. 60. The Court  
17 preliminarily approved the fairness of the anticipated fees, taking particular note  
18 of the fact that fees were not negotiated or discussed at all between the parties until  
19 the class recovery was fully negotiated in principle, and also due to the fact that  
20 the fees requested were only approximately 5% of the Settlement Benefit to the  
21 Class. The Court noted that it would scrutinize the fee request at the final fairness  
22 hearing. Dkt. No. 60, Pg 12.

23 Federal Rules of Civil Procedure provide that "[i]n a certified class action,  
24 the court may award reasonable attorneys' fees and nontaxable costs that are  
25 authorized by law or by the parties agreement." Fed. R. Civ. P. 23. As noted by  
26 Plaintiff's Motion for Preliminary Approval of Class Action Settlement and  
27 Certification of Settlement Class, which was approved by this Court (Dkt. No. 60  
28 and 62), the Settlement Agreement in this action resulted from extensive arm's



1 length negotiations, including a full-day mediation session before Hon. Judge  
2 Louis M. Meisinger (Ret.). Friedman Decl ¶ 17. The arm's length negotiations,  
3 especially those before Judge Meisinger, serve as "independent confirmation" of  
4 the reasonableness of the Settlement's terms including the attorneys' fees, costs,  
5 and incentive award sought by this Motion. *See Hanlon v. Chrysler Corp.*, 150  
6 F.3d 1011, 1029 (9th Cir. 1998). Under these circumstances, the Court may give  
7 deference to the judgment of the parties regarding the reasonableness of the  
8 requested fees.

9 The reasonableness of the requested fees is also supported by the  
10 "percentage-of-the-fund" and "lodestar" approach. The \$1,200,000 in attorneys'  
11 fees sought equates to approximately 5% of the estimated \$23,000,000 in  
12 settlement benefit provided to the Class, the majority of which is not subject to the  
13 claims process. This is but a small fraction of the Ninth Circuit's benchmark  
14 percentage of 25% for attorneys' fee awards. Additionally, Class Counsel have  
15 incurred a combined total of 669.95 hours litigating this action for a combined  
16 lodestar of \$411,237.75. Notably, Class Counsel estimate that they will spend  
17 approximately another 100-150 hours working on the case including overseeing  
18 the administration of class settlement benefits, communicating with class  
19 members, , responding to any potential objectors, moving for final approval,  
20 preparing for and attending the final approval hearing, and ensuring the final  
21 distribution of settlement benefits are carried out in full. Without taking into  
22 account these additional anticipated hours, the fee request currently represents a  
23 reasonable lodestar multiplier of 2.9, which serves as an independent cross check  
24 as to the reasonableness of the fee request.<sup>3</sup>

25 Through this fee brief, which is unopposed by Defendant, Plaintiff seeks  
26 Court approval of the agreed-upon costs and fees as follows: (1) attorneys' fees in

27 \_\_\_\_\_  
28 <sup>3</sup> The Lodestar multiplier is estimated by counsel to be 2.3 once administration is complete.

1 the amount of \$1,200,000; (2) litigation costs in an amount of \$12,137.51; and (3)  
2 an incentive award of \$5,000 to Plaintiff Lisa Kim. As more thoroughly stated  
3 herein and as detailed in the supporting declaration filed herewith, these sums are  
4 fair and reasonable as they resulted from extensive arm's length negotiations and  
5 are further supported by the percentage-of-the-fund and loadstar methodologies.  
6 Friedman Decl. ¶¶ 17-61.

## 7 **II. STATEMENT OF FACTS**

### 8 **A. Factual Background**

9 Tinder is a smartphone-based dating application that is used by consumers  
10 throughout the world, including California. The core functionality of the app  
11 enables users to view profiles of other users in the same geographic locale and to  
12 either indicate an interest in (i.e., to "like") another user or, alternatively, indicate  
13 a lack of interest. If two users indicate an interest in each other's profile, they can  
14 then communicate with each other through the app. The app also allows a user to  
15 indicate a heightened degree of interest in another user through a feature known as  
16 a "Super Like." The app may be downloaded and used for free, but certain  
17 additional or premium features can only be accessed by purchasing a subscription  
18 to Tinder Plus or Tinder Gold. Such features include, among other things,  
19 unlimited likes (whereas the free version has a daily limit), no paid advertisements,  
20 the ability to undo dislikes, the ability to view profiles in other locales, and to  
21 ability to exert more control over other variables involved in using the app. Also,  
22 subscribers receive more free Super Likes than non-subscribers, but any user of the  
23 app may purchase additional Super Likes for a typical price of 99 cents each.

24 Plaintiff, a female user over the age of 29, alleges that when she and Class  
25 Members purchased Tinder premium services (Plus or Gold), Defendants  
26 discriminated against such consumers based on age, by charging more money for  
27 the same service for consumers age 29 and older. Plaintiff claims that Defendants'  
28 widespread and uniform conduct is in direct violation of the Unruh Civil Rights

1 Act, *Cal. Civ. Code* §§ 51, et seq. (“Unruh Act”), which generally outlaws age  
2 discrimination by businesses operating in California. In addition, Plaintiff alleges  
3 that Defendants’ pricing scheme violates the Unfair Competition Law, *Cal. Bus.  
4 & Prof. Code* §§ 17200, et seq. (“UCL”). Plaintiff sought three categories of relief:  
5 1) monetary relief under the Unruh Act in the form of statutory penalties; 2)  
6 restitutionary relief, i.e. a refund of the unlawful premiums charged to users age 29  
7 or older (\$10 per month per user); and 3) public injunctive relief putting a halt to  
8 Defendants’ unlawful age-based price discrimination scheme. Defendants  
9 vigorously dispute Plaintiff’s claims, dispute that Plaintiff will prevail on her  
10 appeal of the Court’s Order granting Defendants’ motion to compel arbitration, and  
11 deny all charges of wrongdoing or liability asserted against them in the Litigation.

12 **B. Proceedings to Date**

13 On April 12, 2018, Plaintiff filed her class action lawsuit against Defendants,  
14 alleging that Defendants violated the Unruh Act. Defendants responded on June  
15 11, 2018 by filing filed a Motion to Compel Arbitration or Stay Under the Colorado  
16 Abstention Doctrine. On June 22, 2018, Plaintiff filed her First Amended  
17 Complaint, adding the UCL cause of action for public injunctive relief. In their  
18 Motion, Defendants claimed that Plaintiff had entered into an arbitration agreement  
19 based on her alleged assent to the arbitration provision in Tinder app’s Term of  
20 Use through the use of “sign-up wrap” consent in order to access the app.  
21 Defendants’ Motion to Compel Arbitration was granted on July 5, 2018, and the  
22 Court compelled Plaintiff’s claims to arbitration.

23 On July 16, 2018, Plaintiff filed her appeal of the Court’s decision on the  
24 Motion, based on her position that the Court did not appropriately consider  
25 California Supreme Court precedent interpreting substantive California law in  
26 *McGill v. Citibank, N.A.*, 2 Cal.5th 945 (2017), which states that claims for public  
27 injunctive relief, such as the one brought in Plaintiff’s case under the UCL, cannot  
28 be compelled to arbitration. In addition, Plaintiff would argue that the Court

1 disregarded recent relevant appellate case law, *Cullinane v. Uber Technology, Inc.*  
2 893 F.3d 53 (1st Cir. 2018), which bore directly on whether there was appropriate  
3 assent by Plaintiff and the Class Members to the Tinder app's Term of Use.<sup>4</sup>

4 A mediation was scheduled for November 29, 2018, and the Parties  
5 stipulated to continue the initial briefing deadlines in the appeal. The Parties  
6 attended a mediation with Judge Meisinger on November 29, 2018. The Parties  
7 did not resolve the case at the mediation, but engaged in subsequent discussions  
8 with Judge Meisinger. With his guidance, this Settlement was reached on  
9 December 1, 2018. On March 1, 2019, the Honorable Court granted Plaintiff's  
10 Motion for Preliminary Approval, finding that the requirements of Rule 23(e) were  
11 preliminarily satisfied. Dkt. No. 60. The Court requested that counsel file a revised  
12 proposed notice, and lodge a revised proposed order granting preliminary approval.  
13 Dkt. No. 60 Pg. 13. Counsel did so. Dkt. No. 61. The Court thereafter granted  
14 preliminary approval. Dkt. No. 62.

15 **C. Class Notice Was Successfully Disseminated**

16 On April 5, 2019, Epiq disseminated the Class Notice to Class Members via  
17 email, as was approved as the best notice practicable by This Honorable Court.  
18 The email campaign was highly successful at delivering targeted notice directly to  
19 the hands of Class Members, who almost certainly all used smartphone devices  
20 hooked to these same email accounts as part of their everyday life. Friedman Decl.  
21 ¶¶ 24-30. Epiq reported that approximately 85% of the Class Members received  
22 direct notice, much higher than the 70% threshold that the Rule 23 guidelines  
23 specify for due process purposes. Epic was able to send 240,592 emails to Class  
24 Members, with 203,741 of those emails delivered. Email addresses for all but 19  
25

---

26 <sup>4</sup> The *Cullinane* opinion was rendered the same day Plaintiff's opposition to  
27 Defendants' Motion was due, leaving Plaintiff no time to incorporate arguments  
28 and facts related to the on-point case into her opposition. The Court did not consider  
Plaintiff's Notice of the new case, and denied Plaintiff's Ex Parte Application.

1 of the Class Members were located in Tinder’s records. *Id.* Since that time, neither  
2 Plaintiffs’ counsel nor Defense counsel have received any objections from absent  
3 Class Members, and only one individual has expressed a desire to opt out of the  
4 settlement as of the time of the filing of this Motion. *Id.*

5 **III. THE SETTLEMENT**

6 **A. The Settlement Class.**

7 The “Settlement Class” is defined in the Agreement as follows:

8 *“Every California subscriber to Tinder Plus or Tinder Gold*  
9 *during the Class Period who at the time of subscribing was at*  
10 *least 29 years old and was charged a higher rate than*  
11 *younger subscribers, except those who choose to opt out of*  
12 *the Settlement Class.”* (Agreement § 2.21.)

13 The Class Period is from March 2, 2015 through the date that the Court grants  
14 preliminary approval of the Settlement. (*Id.* § 2.6.) Defendants maintain email  
15 addresses for the vast majority of users of the app, and based on data provided by  
16 Defendants and their counsel, the Class contains approximately 230,000 Members.

17 **B. Settlement Benefits.**

18 Under the Settlement, Defendants agree to a multifaceted Settlement  
19 structure, which includes a universal participation component (automatic benefits  
20 to all Class Members); an additional cash or cash-equivalent payout to Class  
21 Members who submit timely valid claims; and an agreement to substantially halt  
22 Defendants’ allegedly discriminatory practices going forward. Attorneys’ fees,  
23 costs, administration expenses, and the Incentive Payment to Plaintiff will all be  
24 separately paid by Defendants. These benefits are significant, tangible and offer  
25 fair remuneration for the Class.

26 Pursuant to the Agreement, Class Notice will be sent via email to the  
27 approximately 230,000 persons in the Settlement Class. (Agreement § 1.4, 4.3-4.4;  
28 Ex A-2). The Class Notice will explain that if the Member has a Tinder account,  
or has reactivated a Tinder account associated with the same email address that

1 pertained to his or her previous account, the Member will automatically receive 50  
2 Super Likes (equivalent to \$50 in value). *Id.* This benefit will be issued to each  
3 and every Class Member irrespective of whether the Member submits a claim. In  
4 addition, each Member may submit a claim form to obtain one of the following  
5 benefits: (1) \$25.00 in cash; (2) 25 Super Likes (but only if the Member has a  
6 Tinder account); or (3) a one-month subscription of Tinder Plus or Tinder Gold,  
7 depending on which of those services the Member had previously purchased (but  
8 only if the Member does not already have a subscription). (Agreement § 3.2-3.3).  
9 In addition to foregoing monetary relief, Defendants have agreed to alter their  
10 practices and largely halt their price differentiation practices in California as they  
11 pertain to age. *Id.* at ¶ 3.4. Plaintiff estimates this revision to pricing  
12 discrimination is worth at least \$5.75 million to the Class. Friedman Decl. ¶ 34.

13 Separate and apart from these Class benefits, Defendants have agreed to  
14 retain a Settlement Administrator and to pay for any and all costs associated with  
15 administering the Settlement, including Class and CAFA Notice, handling of  
16 claims and the distribution of monetary payments to Members who choose that  
17 option, and developing and maintaining the Settlement Website. (Agreement §§  
18 4.3-4.5, 5.4). Defendants have also agreed to pay the proposed \$5,000.00 Incentive  
19 Payment to the Plaintiff (Agreement § 7.2) and the proposed Attorneys' Fee Award  
20 in the amount of \$1,200,000.00 plus reasonable Cost Reimbursement to Class  
21 Counsel, pending approval by the Court. (Agreement § 7.1). Class Notice was  
22 provided on April 5, 2019, giving Class Members ample time and notice in advance  
23 of the Final Approval Hearing.<sup>5</sup> (Agreement § 4.9). Before Class Notice is  
24 provided, the Settlement Administrator will develop the Settlement Website,

25 \_\_\_\_\_  
26 <sup>5</sup> Email is the best notice practicable because Defendants generally maintain email  
27 address data for Class Members but not physical addresses or other information  
28 (such as landline phone numbers) that would permit Class Counsel to efficiently  
conduct a reverse lookup and send mail notice. Given the 85% successful  
transmission rate of the email notice, due process has been satisfied.



1 which shall contain relevant documents pertaining to the Settlement including the  
2 Settlement Agreement, the Claim Form, the Class Notice, and the Preliminary  
3 Approval Order. (Agreement §§ 4.5, 5.2). Under the terms of the proposed  
4 Settlement, Members will have the right to opt out of the Settlement or object to  
5 its terms. A Member who wishes to opt out of the Settlement must, no later than  
6 30 days after the Class Notice Date, mail an opt-out request to counsel for the  
7 Parties. (Agreement § 4.8). A Member who does not opt out and who wishes to  
8 object to the Settlement may do so by filing with the Court and mailing to counsel  
9 for the Parties, no later than May 6, 2019. Dkt. No. 60; Agreement § 4.7.

10 The Settlement contemplates that Class Counsel may apply to the Court for  
11 an award of attorneys' fees in the amount of \$1,200,000.00 (plus reimbursement  
12 of costs), representing 5% of the total estimated value of the Settlement (including  
13 the value of the injunctive component), which provides significant value to the  
14 Class. Defendants have agreed not to oppose an application by Class Counsel for  
15 an award of attorneys' fees and costs, as long as it does not exceed this stated  
16 amount. (Agreement § 7.1). The Settlement contemplates that Class Counsel will  
17 request an Incentive Award in the amount of \$5,000.00 to be distributed to the  
18 Class Representative, subject to Court approval. Defendants have agreed not to  
19 oppose this request. (Agreement § 7.2).

#### 20 **IV. ARGUMENT**

##### 21 **A. The Requested Fee Award Is Fair, Reasonable And Justified**

22 Class Counsel respectfully assert that (A) the requested fee award of  
23 \$1,200,000 is fair, reasonable, and justified; and (B) the payment of \$12,137.51 in  
24 costs is fair and reasonable. Friedman Decl., ¶¶ 17-61. The Federal Rules of Civil  
25 Procedure provide that “[i]n a certified class action, the court may award  
26 reasonable attorneys’ fees and nontaxable costs that are authorized by law or by  
27 the parties agreement.” Fed. R. Civ. P. 23(h) (emphasis added). As explained by  
28 the Ninth Circuit, “[a]ttorneys’ fees provisions included in proposed class action

1 settlement agreements are, like every other aspect of such agreements, subject to  
2 the determination whether the settlement is ‘fundamentally fair, adequate, and  
3 reasonable.’” *Staton v. Boeing Co.*, 327 F.3d 938, 963 (9th Cir. 2003). In common  
4 fund cases, Courts within the Ninth Circuit have discretion to use one of two  
5 methods to determine whether the fee request is reasonable: (1) percentage-of-the-  
6 fund; or, (2) lodestar plus a risk multiplier. *Staton*, 327 F.3d at 967-68. *See also*  
7 *In re Mercury Interactive Corp.*, 618 F.3d 988, 992 (9th Cir. 2010). “Though  
8 courts have discretion to choose which calculation method they use, their  
9 discretion must be exercised so as to achieve a reasonable result.” *In re Bluetooth*  
10 *Headset Prods. Liab. Litig.*, 654 F.3d 935, 942 (9th Cir. 2011).

11 Class Counsel maintain the request for attorneys’ fees is reasonable based  
12 solely upon the arm’s length formal negotiations that serve as independent  
13 confirmation of the fairness of the settlement, including attorneys’ fees. *See*  
14 *Hanlon*, 150 F.3d at 1029. However, the requested fees are also fully supported  
15 under the percentage-of-the-fund and lodestar approach, which Class Counsel offer  
16 as an additional and optional means of cross-checking the requested fees.

### 17 **1. The Requested Fees Resulted from Arm’s Length** 18 **Negotiations**

19 While attorneys’ fee provisions included in class action settlements are  
20 subject to the determination of whether the provision is fundamentally fair,  
21 adequate and reasonable, the Ninth Circuit has opined that “the court’s intrusion  
22 upon what is otherwise a private consensual agreement negotiated between the  
23 parties to a lawsuit must be limited to the extent necessary to reach a reasoned  
24 judgment that the agreement is not the product of fraud or overreaching by, or  
25 collusion between, the negotiating parties, and that the settlement, taken as a  
26 whole, is fair, reasonable and adequate to all concerned.” *Hanlon*, 150 F.3d at  
27 1027 (citing *Officers for Justice v. Civil Serv. Comm’n of City & Cnty. of San*  
28



1 *Francisco*, 688 F.2d 615, 625 (9th Cir. 1982)) (emphasis added). *See also Lundell*  
2 *v. Dell, Inc.*, CIV A C05-3970 JWRS, 2006 WL 3507938 (N.D. Cal. Dec. 5, 2006).

3 In *Hanlon*, the Ninth Circuit went on to state that where settlement terms,  
4 including attorneys' fees, are reached through formal mediation, the Court may  
5 rely upon the mediation proceedings "as independent confirmation that the fee was  
6 not the result of collusion or a sacrifice of the interests of the class." *Hanlon*, 150  
7 F.3d at 1029.<sup>6</sup> Here and as previously stated in Plaintiff's Motion For Preliminary  
8 Approval of Class Action Settlement and Certification of Settlement Class, which  
9 this Court has approved (Dkt. No. 60 and 62), the Settlement Agreement resulted  
10 from extensive arm's length negotiations. Friedman Decl. ¶¶ 17-19. More  
11 specifically, the Parties attended a full-day mediation session with the Honorable  
12 Louis M. Meisinger (Ret.), where the parties were able to agree on the terms of a  
13 settlement agreement. *Id.* The parties had also conducted extensive informal and  
14 formal discovery surrounding Plaintiff's claims and Defendant's defenses. Agr. §  
15 c; Friedman Decl., ¶¶ 4-19. Additionally, and as noted by The Court in its Order  
16 Granting Preliminary Approval, the attorneys' fees sought were not discussed at  
17 all during settlement negotiations at mediation until after the Class Members'  
18 portion of the recovery had been fully negotiated in principle. Dkt. No. 60 Pg. 12.  
19 Under these circumstances, the Court may give deference to the mediation  
20 proceedings and the judgment of the Parties regarding the reasonableness of fees.

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21 <sup>6</sup> *See also Milliron v. T-Mobile USA, Inc.*, 2009 WL 3345762, at \*5 (D.N.J. Sept.  
22 14, 2009) ("the participation of an independent mediator in settlement negotiation  
23 virtually insures that the negotiations were conducted at arm's length and without  
24 collusion between the parties"); *Sandoval v. Tharaldson Emp. Mgmt., Inc.*, 2010  
25 WL 2486346, at \*6 (C.D. Cal. June 15, 2010) ("the assistance of an experienced  
26 mediator in the settlement process confirms that the settlement is non-collusive");  
27 *Dennis v. Kellogg Co.*, 2010 WL 4285011, at \*4 (S.D. Cal. Oct. 14, 2010) (the  
28 parties engaged in a "full-day mediation session," which helped to establish that the  
proposed settlement was noncollusive). *See also* 2 McLaughlin on Class Actions,  
§ 6:7 (8th ed.) ("A settlement reached after a supervised mediation receives a  
presumption of reasonableness and the absence of collusion").

1 However, the requested fee is also wholly supported by the both the percentage-  
2 of-the-fund and lodestar methods, which the Court may employ as a means of  
3 assessing the reasonableness of the requested fee.

4 **2. The Requested Fees are Reasonable, Fair, and Justified**  
5 **Under the Percentage-of-the-Fund Method**

6 Courts consider a number of factors to determine the appropriate percentage  
7 of the fund to awarding as attorneys' fees in a common fund case including: (a) the  
8 results achieved; (b) the risk of litigation; (c) the skill required and the quality of  
9 work; (d) the contingent nature of the fee; and, (e) awards made in similar cases.  
10 *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043, 1047, 1048-1050 (9th Cir. 2002). The  
11 "benchmark" percentage for attorney's fees in the Ninth Circuit is 25% of the  
12 common fund with costs and expenses awarded in addition to this amount.  
13 *Vizcaino*, 290 F.3d at 1047. "However, in most common fund cases, the award  
14 exceeds that [25%] benchmark." *In re Omnivision Techs.*, 559 F. Supp. 2d 1036,  
15 1047 (N.D. Cal. 2007) (citing *In re Activision Sec. Litig.*, 723 F. Supp. 1373, 1378  
16 (N.D. Cal. 1998)). Both the *Omnivision* and *Activision* Courts concluded that  
17 "Absent extraordinary circumstances that suggest reasons to lower or increase the  
18 percentage, the rate should be set at 30%." *Omnivision*, 559 F. Supp. 2d at 1048.

19 Class Counsel's request for attorneys' fees in the amount of \$1,200,000  
20 equates to only approximately 5% of the Settlement Benefits negotiated as part of  
21 the Settlement Agreement. This falls far below the Ninth Circuit's benchmark. In  
22 most cases, the benchmark 25% in attorneys' fees are most often paid from the  
23 fund, thereby reducing class members' recovery, which is not how this agreement  
24 is structured. In fact, Defendant is agreeing to pay fees completely separate from  
25 the Class Members' recoveries, which makes this Settlement Structure even more  
26 favorable for Class Members, and makes the fee request even more reasonable.  
27 The Court does not need to be concerned that the funds paid to Class Counsel will  
28 be coming out of the pockets of Class members. Moreover, the fee request is fully

1 supported by the factors enunciated in *Vizcaino* including: (a) the results achieved;  
2 (b) the risk of litigation; (c) the skill required and the quality of work; (d) the  
3 contingent nature of the fee; and, (e) awards made in similar cases.

4 **a. Class Counsel Obtained Excellent Results for the Class**

5 The results obtained for the class are generally considered to be the most  
6 important factor in determining the appropriate fee award in a common fund case.  
7 *See Hensley v. Eckerhart*, 461 U.S. 424, 435 (1983); *Omnivision*, 559 F. Supp. 2d  
8 at 1046. *See also* Federal Judicial Center, Manual for Complex Litigation, § 27.71,  
9 p. 336 (4th Ed. 2004) (the “fundamental focus is on the result actually achieved for  
10 class members”) (citing Fed. R. Civ. P. 23(h) committee note). Standing alone,  
11 this factor supports Class Counsel’s fee request. The settlement secured by  
12 Plaintiff and Class Counsel provides an excellent recovery for Class Members.  
13 The three-pronged recovery provided to Class Members ensures that Class  
14 Members all will benefit from the agreement, that additional monetary relief will  
15 be available to participating Class Members, and that Defendant will halt its  
16 alleged unlawful price discrimination, which was one of the core goals of the  
17 litigation. As a result, it is anticipated that the vast majority of the Settlement will  
18 provide direct and meaningful benefits to the Settlement Class.<sup>7</sup>

19 This Settlement intentionally avoids providing significant benefits to a *cy*  
20 *pres* recipient at the expense of the class. *See Dennis v. Kellogg Co.*, 697 F.3d 858,  
21 862-63 (9th Cir. 2012) (the amount of a *cy pres* award “must be examined with  
22 great care to eliminate the possibility that it serves only the ‘self-interests’ of the

23 \_\_\_\_\_  
24 <sup>7</sup> *See Shames v. Hertz Corp.*, Case No. 07-CV-2174-MMA WMC, 2012 WL  
25 5392159 at \*13 (S.D. Cal. Nov. 5, 2012) (settlement was fair where the parties  
26 “negotiated a settlement that provide[d] direct payment to class members”); *Hopson*  
27 *v. Hanesbrands Inc.*, Case No. CV-08-0844 EDL, 2009 WL 928133, at \*11 (N.D.  
28 Cal. Apr. 3, 2009) (“the benefits can be accurately traced because they are monetary  
payments directly to Class Members”); *Briggs v. United States*, Case No. C 07-  
05760 WHA, 2010 WL 1759457 (N.D. Cal. Apr. 30, 2010) (settlement agreement  
was fair where it did not require class members to file claim forms).

1 attorneys and the parties, and not the class”); *Lane v. Facebook, Inc.*, 709 F.3d 791,  
2 793 (9th Cir. 2013) (“We require district judges to be reasonably certain that class  
3 members will benefit before approving a cy pres settlement.”); *In re EasySaver*  
4 *Rewards Litig.*, 921 F. Supp. 2d 1040, 1049 (S.D. Cal. 2013).<sup>8</sup>

5 The settlement award that each Settlement Class Member will receive is fair,  
6 appropriate, and reasonable given the purposes of the Unruh Act and UCL and in  
7 light of the anticipated risk, expense, and uncertainty of continued litigation.  
8 Although the Unruh Act provides for statutory damages of \$4,000.00 per violation,  
9 it is well-settled that a proposed settlement may be acceptable even though it  
10 amounts to a percentage of the potential recovery that might be available to the  
11 class members at trial.<sup>9</sup> Indeed, California Appellate Courts have upheld the  
12 reasonableness of Unruh Act class action settlements which provided for no  
13 monetary relief, but rather only injunctive relief. *See Carter v. City of Los Angeles*,  
14 224 Cal.App.4th 808 (2014) (injunction only class settlement under Unruh Act  
15 upheld as fair and reasonable, however overturning district court order based solely  
16 on the fact that non-opt out provision violated due process). The case at bar not

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17 <sup>8</sup> Courts favor payment to class members over *cy pres*. *See Molski v. Gleich*, 318  
18 F.3d 937, 954-55 (9th Cir. 2003) *overruled on other grounds by Dukes v. Wal-*  
19 *Mart Stores, Inc.*, 603 F.3d 571 (9th Cir. 2010) (*cy pres* provision is a disfavored  
20 substitute for distribution of benefits directly to class members); *Nachshin v. AOL,*  
21 *LLC*, 663 F.3d 1034, 1038 (9th Cir. 2011) (“[T]he *cy pres* doctrine—unbridled by  
a driving nexus between the plaintiff class and the *cy pres* beneficiaries—poses  
many nascent dangers to the fairness of the distribution process.”).

22 <sup>9</sup> *See e.g., National Rural Tele. Coop. v. DIRECTV, Inc.*, 221 F.R.D. 523, 527 (C.D.  
23 Cal. 2004) (“well settled law that a proposed settlement may be acceptable even  
24 though it amounts to only a fraction of the potential recovery”); *In re Global*  
25 *Crossing Sec. and ERISA Litig.*, 225 F.R.D. 436, 460 (E.D. Pa. 2000) (“the fact that  
26 a proposed settlement constitutes a relatively small percentage of the most  
27 optimistic estimate does not, in itself, weigh against the settlement; rather, the  
28 percentage should be considered in light of the strength of the claims”); *In re*  
*Omnivision Tech., Inc.*, 559 F. Supp. 2d 1036 (N.D. Cal. Jan. 9, 2008) (court-  
approved settlement amount that was small fraction of the maximum potential  
recovery); *In re Mego Fin'l Corp. Sec. Litig.*, 213 F. 3d 454, 459 (9th Cir. 2000).

1 only provides meaningful injunctive relief, but also provides a universal  
2 participation component via the automatic provision of Super Likes to Class  
3 Members, as well as a monetary relief component to any Class members who  
4 participate in the filing of a claim form. As such, the benefits to Class Members  
5 far exceed the result achieved in other Unruh Act and UCL actions.

6 **b. The Risks of Litigation Support the Requested Fees**

7 “The risk that further litigation might result in Plaintiffs not recovering at  
8 all, particularly a case involving complicated legal issues, is a significant factor in  
9 the award of fees.” *Omnivision*, 559 F. Supp. 2d at 1046-47. *See also Vizcaino*,  
10 290 F.3d at 1048 (risk of dismissal or loss on class certification is relevant to  
11 evaluation of a requested fee). Throughout litigation and mediation, Defendants  
12 have vigorously contested the claims asserted by Plaintiff. While both sides  
13 strongly believe in the merits of their respective cases, there are risks to both sides  
14 in continuing the Litigation. If the Litigation were to continue, the primary initial  
15 challenge for Plaintiff would be overcoming the pending appeal. Defendants  
16 represented that over 95% of the Class Members entered into arbitration  
17 agreements such as the one entered into by Plaintiff. The Ninth Circuit has recently  
18 held that such agreements can be a bar to class certification under the right  
19 circumstances. *See O'Connor v. Uber Technologies, Inc.*, 904 F.3d 1087 (9<sup>th</sup> Cir.  
20 2018). Even if Plaintiff won her appeal, Defendants would likely challenge any  
21 class certification motion made by Plaintiff, thereby placing in doubt whether  
22 certification of a class could be obtained and/or maintained in the Litigation. Also,  
23 additional substantive challenges to the claims might be raised, including a  
24 challenge on summary judgment. In considering the Settlement, Plaintiff and Class  
25 Counsel carefully balanced the risks of continuing to engage in protracted and  
26 contentious litigation, against the benefits to the Class.

27 Similarly, Defendants believe that they have strong and meritorious defenses  
28

1 not only in the Litigation as a whole, as well as on the appeal, but also as to class  
2 certification and the amount of damages sought. However, Defendants recognize  
3 that if a class were certified, there is some risk of a damages award substantially  
4 higher than the value of the Settlement. The negotiated Settlement reflects a  
5 compromise between avoiding that risk and the risk that the Class might not  
6 recover. These risks put the strength of the settlement achieved by Class Counsel  
7 into context. Because of the costs, risks to both sides, and delays of continued  
8 litigation, the Settlement presents a fair and reasonable alternative to continuing to  
9 pursue the Litigation.

10 In considering the Settlement, Plaintiff and Class Counsel carefully balanced  
11 the risks of continuing to engage in protracted and contentious litigation against  
12 the benefits to the Class including the significant benefit and the deterrent effects  
13 it would have. As a result, Class Counsel supports the Settlement and seeks its  
14 Approval. *Id.* . The negotiated Settlement is a compromise avoiding the risk that  
15 the class might not recover and presents a fair and reasonable alternative to  
16 continuing to pursue the Action as a class action for alleged violations of the Unruh  
17 Act and UCL. Furthermore, Judge Meisiger, who is intimately familiar with the  
18 instant litigation as well as the current climate of UCL and Unruh Act litigation as  
19 a whole, agrees with the parties. The Honorable Court agreed with this reasoning  
20 in preliminarily approving the settlement. Thus, the risks of continued litigation  
21 not only depicts the high degree of results obtained for the Class, but also further  
22 support the reasonableness of the requested fees.

23 **c. The Skill Required and Quality of Work Performed**  
24 **Support the Requested Fees**

25 The “prosecution and management of a complex [] class action requires  
26 unique legal skills and abilities” that are to be considered when evaluating fees.  
27 *Omnivision*, 559 F. Supp. 2d at 1047. Class Counsel are experienced class action  
28 litigators who have been appointed “class counsel” in numerous UCL and related



1 consumer protection class actions. Class Counsel have successfully prosecuted  
2 numerous complex consumer class actions, and secured noteworthy recoveries for  
3 those classes. Class Counsel’s proven track record demonstrates not only the  
4 quality of work performed, but also the skill required to successfully prosecute  
5 large complex class actions. Friedman Decl. ¶¶ 31-37; Kristensen Decl. ¶¶ 16-38.

6 Class Counsel performed significant factual investigation prior to bringing  
7 the action, going back three years to a prior action where the Unruh Act claims at  
8 issue in this litigation were first alleged by Class Counsel. Friedman Decl. ¶¶ 4-8.  
9 Class Counsel conducted extensive discovery into the scope of the violations as  
10 well as the legal and procedural challenges in the case. Nobody could say that this  
11 case was not fully investigated, or thoroughly and vigorously litigated. Class  
12 Counsel requested and was provided with all necessary information necessary to  
13 make a meaningful settlement decision on behalf of the Class, and vigorously  
14 negotiated for and secured this robust and highly favorable result during a full-day  
15 mediations session. Thus, Class Counsels’ skill and expertise, reflected in the  
16 prompt and significant Settlement, supports the requested fees.

17 **d. Class Counsels’ Undertaking of this Action on a**  
18 **Contingency-Fee Basis Supports the Requested Fees**

19 The Ninth Circuit has long recognized that the public interest is served by  
20 rewarding attorneys who undertake representation on a contingent basis by  
21 compensating them for the risk that they might never be paid for their work. *In re*  
22 *Washington Pub. Power Supply Sys. Sec. Litig.*, 19 F.3d 1291, 1299 (9th Cir. 1994)  
23 (“Contingent fees that may far exceed the market value of the services if rendered  
24 on a non-contingent basis are accepted in the legal profession as a legitimate way  
25 of assuring competent representation for Plaintiffs who could not afford to pay on  
26 an hourly basis regardless of whether they win or lose”); *Vizcaino*, 290 F.3d at  
27 1051 (courts reward successful class counsel in contingency cases “for taking risk  
28 of nonpayment by paying them a premium over their normal hourly rates”).

1           Class Counsel prosecuted this matter on a purely contingent basis while  
2 agreeing to advance all necessary expenses knowing that Class Counsel would only  
3 receive a fee if there were a recovery. *See* Friedman Decl., ¶¶ 38-60. In pursuit of  
4 this litigation, Class Counsel have spent considerable outlays of time and money  
5 by, among other things, (1) investigating the actions; (2) conducting discovery on  
6 Defendant; (3) opposing motions; (4) filing an appeal; (5) negotiating the  
7 Settlement in private mediation; (6) Class counsel will also be required to oversee  
8 administration of the Settlement; and, (7) respond to Class Member inquiries.  
9 Class Counsel expended these resources despite the risk that Class Counsel may  
10 never be compensated especially in light of the fluctuating interpretations of the  
11 merits issues, certification issues, and arbitration issues, and the difficulty in  
12 securing class certification.

13           Class Counsel here incurred \$12,137.51 in costs (as of April 22, 2019) and  
14 spent 669.95 hours litigating this action. Friedman Decl., ¶¶ 33-51 and Ex. A;  
15 Kristensen Decl ¶ 16-38; Ex 1. There were no guarantees of victory, and there  
16 were numerous risks raised by Defendant. Thus, Class Counsels’ “substantial  
17 outlay, when there is a risk that none of it will be recovered, further supports the  
18 award of the requested fees” in this matter. *Omnivision*, 559 F. Supp. 2d at 1047.  
19 As articulated above, the percentage-of-the-fund method is the preferred and most  
20 widely used method for determining attorneys’ fees. The requested fees are fully  
21 supported by the factors enunciated by *Vizcaino* and is commensurate with the  
22 excellent results obtained for the Class. While the requested fees are fully  
23 supported by the percentage-of-the-fund method, it should again be noted that the  
24 application of the percentage-of-the-fund method is optional and may be applied  
25 at the Court’s discretion. In addition, the Court may also apply the lodestar method  
26 as another optional means of cross- checking the requested fees.



1                                   **3. The Requested Fee is Reasonable, Fair, and Justified Under**  
 2                                   **the Lodestar Method**

3                   A court applying the percentage-of-the-fund method may use the lodestar  
 4 method as a “cross-check on the reasonableness of a percentage figure.” *Vizcaino*,  
 5 290 F.3d at 1050. However, a cross-check is optional. *See Glass v. UBS Fin.*  
 6 *Servs.*, 2007 U.S. Dist. LEXIS 8476, at \*48 (N.D. Cal. Jan. 26, 2007) (finding that  
 7 “where the early settlement resulted in a significant benefit to the class,” there is  
 8 no need “to conduct a lodestar cross-check”). If the Court chooses to perform such  
 9 a cross-check in this matter, it will confirm that an approximately 5% fee award of  
 10 \$1,200,000 is reasonable. The first step in the lodestar-multiplier approach is to  
 11 multiply the number of hours counsel reasonably expended by a reasonable hourly  
 12 rate. *Hanlon*, 150 F.3d at 1029. Once this raw lodestar figure is determined, the  
 13 Court may then adjust that figure based upon its consideration of many of the same  
 14 “enhancement” factors considered in the percentage-of-the-fund analysis, such as:  
 15 (1) the results obtained; (2) whether fee is fixed or contingent; (3) the complexity  
 16 of the issues involved; (4) the preclusion of the other employment due to  
 17 acceptance of the case; and, (5) the experience, reputation, and ability of the  
 18 attorneys. *See Kerr v. Screen Extras Guild, Inc.*, 526 F.2d 67, 70 (9th Cir. 1975).<sup>10</sup>

19                                   **a. Class Counsels’ Lodestar is Reasonable**

20                   The accompanying declaration of Class Counsel set forth the hours of work  
 21 and billing rates used to calculate their lodestar. Plaintiff’s attorneys’ work is  
 22 summarized as follows:  
 23  
 24

25 \_\_\_\_\_  
 26 <sup>10</sup> The risk inherent in contingency representation is a critical factor. The Ninth  
 27 Circuit stresses that “[i]t is an abuse of discretion to fail to apply a risk multiplier  
 28 when...there is evidence that the case was risky.” *Fischel v. Equit. Life Assurance*  
*Soc’y*, 307 F.3d 997, 1008 (9th Cir. 2002); *see also Glass v. UBS Fin. Servs., Inc.*,  
 2007 WL 221862, at \*16 (N.D. Cal. 2007).

**THE LAW OFFICES OF TODD M. FRIEDMAN - LODESTAR**

Name	Number of Hours	Rate/Hr	Total
Todd M. Friedman	97.5	\$725.00	\$70,687.50
Adrian R. Bacon	221.2	\$625.00	\$138,250.00
Thomas E. Wheeler	7.7	\$370.00	\$2,849.00
Lauren Walker	2	\$175.00	\$385.00
Bianca Zinnanti	2.2	\$175.00	\$350.00
<b>TOTAL</b>	<b>330.6</b>		<b>\$212,521.50</b>

**KRISTENSEN WEISBERG, LLP - LODESTAR**

Name	Number of Hours	Rate/Hr	Total
John Kristensen	94.6	\$725.00	\$68,585.00
David Weisberg	34.6	\$725.00	\$25,085.00
Christina Le	137.2	\$625.00	\$85,750.00
Jesenia A. Martinez	37.3	\$350.00	\$13,055.00
Justin Farzadkish	25.3	\$175	\$4,430.00
Vanessa Brahm	10.35	\$175	\$1,811.25
<b>TOTAL</b>	<b>339.35</b>		<b>\$198,716.25</b>

Friedman Decl. ¶¶ 57-60; Ex A; Kristensen Decl. ¶¶ 16-38, Ex 1. As described in the accompanying declarations, Plaintiff's attorneys have devoted a total of 669.95 hours to this litigation to date, and have a total lodestar to date of \$411,237.75 which represents approximately a 2.9 multiplier. *See* Friedman Decl. ¶¶ 43-60. It is estimated that the lodestar multiplier will be approximately 2.3 by the time administration is completed. *Id.*

Thus, Class Counsel's lodestar is reasonable. Class Counsel prosecuted the claims at issue efficiently and effectively, making every effort to prevent the duplication of work that might have resulted from having multiple firms working on this case. In this regard, tasks were reasonably divided among attorneys to ensure avoiding the replication of work. Further, tasks were delegated appropriately among partners, associate attorneys, paralegals, and other staff according to their complexity such that the attorneys with higher billing rates billed

1 time only where necessary. The reality is that the complexity of this matter was  
2 high, and required senior attorneys to handle to majority of tasks. In addition,  
3 Class Counsels' contemporaneous time records were carefully reviewed.  
4 Friedman Decl., ¶ 57-60, Ex A; Kristensen Decl. ¶¶ 33-37, Ex. A.

5 **b. A Modest Lodestar Multiplier Is Warranted**

6 A lodestar multiplier in this case is appropriate given the various factors  
7 outlined under prevailing Ninth Circuit jurisprudence. *Kerr v. Screen Extras*  
8 *Guild, Inc.*, 526 F.2d 67, 70 (9th Cir. 1975). There can be no doubt that the result  
9 achieved was robust, widespread in scope, and meaningful. Class Counsel set out  
10 to hold Defendant accountable for its price discrimination, and successfully  
11 achieved a settlement which provides for an estimated \$23 million in class-wide  
12 relief, and put an end to the very practices that were the subject of this litigation.  
13 The first Ninth Circuit factor heavily supports a reasonable enhancement.

14 Second, the fees earned in this matter were entirely contingent. Class  
15 Counsel have been paid nothing to date, and would have been paid nothing had  
16 they not been able to achieve the robust settlement that has been approved  
17 preliminarily by The Court. Indeed, This Court's order granting Defendant's  
18 Motion to Compel Arbitration, which sparked the subsequent Ninth Circuit appeal  
19 by Plaintiff, and eventually resulted in a settlement dialogue between the Parties,  
20 shows the high stakes at issue for Class Members – Class Members could have  
21 received nothing if the Court's Order was upheld on appeal, or if Class Counsel  
22 had not continued to vigorously fight on behalf of Class Members' rights. This is  
23 the very definition of risk that the Ninth Circuit has held would be improper to  
24 ignore when considering whether and to what extent to grant a lodestar multiplier.  
25 *Fischel v. Equit. Life Assurance Soc'y*, 307 F.3d 997, 1008 (9th Cir. 2002).

26 Third, this matter is a complex class action involving complicated and novel  
27 procedural and legal issues which are actively in flux, including the legality of the  
28

1 alleged conduct by Defendant under applicable law, the arbitrability of public  
 2 injunctive relief claims under the UCL, as guided by the recent *McGill v Citibank*  
 3 matter, and the enforceability of Defendants' arbitration agreements generally,  
 4 among other complex and evolving issues. Navigating these waters required a deft  
 5 hand, and experienced Class Counsel who would be able to ensure that the rights  
 6 of Class Members were advanced effectively.

7 Fourth, Class Counsel are seasoned litigators with heavy active caseloads,  
 8 as can be seen by a brief docket search, as well as by the Accompanying  
 9 Declarations of Class Counsel. The Law Offices of Todd M. Friedman for  
 10 instance, is currently appointed class counsel on dozens of class actions, and is  
 11 actively litigating well over 100 cases. Time spent working on this case was time  
 12 that could not be spent on other cases. Accordingly the fourth factor is satisfied.

13 Finally, the experience and reputation of Class Counsel warrants a  
 14 multiplier.<sup>11</sup> "Multipliers in the 3-4 range are common in lodestar awards for  
 15 lengthy and complex class action litigation." *Van Vranken v. Atlantic Richfield*  
 16 *Co.*, 901 F. Supp. 294, 298 (N.D. Cal. 1995).<sup>12</sup> For these reasons, the modest  
 17 multiplier requested by Class Counsel is appropriate and warranted.

18 **c. Class Counsels' Hourly Rates are Reasonable**

19 Similarly, Class Counsels' hourly rates are also reasonable. In assessing the  
 20 reasonableness of an attorney's hourly rate, courts consider whether the claimed  
 21 rate is "in line with those prevailing in the community for similar services by  
 22 lawyers of reasonably comparable skill, experience and reputation." *Blum v.*

23 \_\_\_\_\_  
 24 <sup>11</sup> Class Counsel are highly skilled and reputable class action attorneys. The Law  
 25 Offices of Todd M. Friedman have secured over \$160 million in class-wide relief  
 26 over the past four years, been appointed class counsel on over 50 class actions by  
 stipulated settlement, and been appointed class counsel by contested motion in 10  
 cases over that same time period.

27 <sup>12</sup> See *In re Beverly Hills Fire Litigation*, 639 F. Supp. 915 (E.D. Ky. 1986)  
 28 (awarding multiplier of 5 for lead counsel); *Di Giacomo v. Plains All Am. Pipeline*,  
 2001 U.S. Dist. LEXIS 25532 (S.D. Tex. Dec. 18, 2001) (approving 5.3 multiplier)

1 *Stevenson*, 465 U.S. 886, 895, n.11 (1994). *See also Davis v. City and County of*  
2 *San Francisco*, 976 F.3d 1536, 1546 (9th Cir. 1992); *Serrano v. Unruh*, 32 Cal. 3d  
3 621, 643 (1982). Class Counsel here are experienced, highly regarded members  
4 of the bar with extensive expertise in the area of class actions and complex  
5 litigation involving consumer claims like those at issue here. *See Friedman Decl.*,  
6 ¶¶ 31-37. Mr. Friedman and Mr. Bacon are also very experienced in litigating  
7 UCL and other consumer protection cases, including class actions, and serve as  
8 class counsel in multiple certified UCL class actions. *Id.*

9 According to the well-respected Laffey Matrix, last reviewed on April 22,  
10 2019, reasonable rates for a Partner of a law firm practicing 11-19 years are  
11 calculated at \$742 per hour. *Friedman Decl. Ex B.* Mr. Friedman has dedicated  
12 his career to consumer protection, including class action litigation. He has secured  
13 eight figure class-wide settlements on behalf of millions of consumers. Thus, the  
14 billing rate for Mr. Friedman of \$725 per hour is well within the normal range of  
15 fees charged by firms in Southern California for partner work.<sup>13</sup> Additionally,  
16 Adrian R Bacon, who has contributed much to this litigation, has significant  
17 experience in litigating consumer class actions, including UCL class actions, which  
18 justifies his hourly rate of \$625. *Friedman Decl. ¶¶ 37-52.* Mr. Bacon is a Partner  
19 at The Law Offices of Todd M. Friedman, P.C., and has secured class certification  
20 status in numerous cases by contested motion, as well as worked on dozens of  
21 actions which settled on a class-wide basis. The hourly rates of Mr. Friedman and  
22 Mr. Bacon requested herein have been approved by courts numerously. *Friedman*  
23 *Decl. ¶¶ 46-60, Ex B.* The same is true with respect to the rates sought by  
24

25 \_\_\_\_\_  
26 <sup>13</sup> *See Hartless v. Clorox Co.*, 273 F.R.D. 630, 643-44 (S.D. Cal. 2011), *aff'd in*  
27 *part*, 473 F. Appx. 716 (9th Cir. 2012) (approving hourly rates of \$675-795 for  
28 partners, up to \$410 for associates, and up to \$345 for paralegals); *see also POM*  
*Wonderful, LLC v. Purely Juice, Inc.*, 2008 WL 4351842 at \*4 (C.D. Cal 2008)  
(finding partner rates of \$750 and associate rates of \$425 reasonable).

1 Kristensen Weisberg, LLP. Kristensen Decl. ¶ 37. Hence, Class Counsels’  
2 combined lodestar of \$411,237.75 is reasonable and supports the requested fees.

3 **B. The Requested Costs Are Fair And Reasonable**

4 “Reasonable costs and expenses incurred by an attorney who creates or  
5 preserves a common fund are reimbursed proportionately by those class members  
6 who benefit from the settlement.” *In re Media Vision Tech. Sec. Litig.*, 913 F.  
7 Supp. 1362, 1366 (N.D. Cal. 1996) (citing *Mills v. Electric Auto-Lite Co.*, 396 U.S.  
8 375, 391-392 (1970)). The significant litigation expenses Class Counsel incurred  
9 in this case were necessary to secure the resolution of this litigation. *See In re*  
10 *Immune Response Sec. Litig.*, 497 F. Supp. 2d 1166, 1177-78 (S.D. Cal. 2007).  
11 Based upon the discussion herein, Class Counsel believe that the costs incurred in  
12 this matter are fair and reasonable.

13 Throughout the course of this litigation, Class Counsel had to incur costs  
14 totaling \$12,137.51. *See* Friedman Decl., ¶¶ 44-45; Kristensen Decl. ¶ 38, Ex 2.  
15 These costs were necessary to secure the resolution of this litigation and Class  
16 Counsel put forward said costs without assurance that Class Counsel would ever  
17 be repaid. Such costs include the cost of filing the case, service, courier fees,  
18 mediation expenses, and appeal fees. All of these expenses were necessary to  
19 advancing the litigation on behalf of the Class. Moreover, none of this expense  
20 will be borne by Class Members, as Defendants have agreed to separately pay for  
21 these expenses. Class Counsel will likely incur additional costs as this case moves  
22 to the final approval stage, which final approval hearing is set for June 17, 2019.

23 **V. KIM’S APPLICATION FOR INCENTIVE AWARD**

24 The proposed Settlement contemplates that Class Counsel will request an  
25 Incentive Award in the amount of \$5,000 to be distributed to the Class  
26 Representative, subject to Court approval. Mediacredit has agreed not to oppose  
27 the request as long as it is not greater than \$5,000. Agreement § 7. District Courts  
28 in California have opined that in many cases, an incentive award of \$5,000 is



1 presumptively reasonable.<sup>14</sup> Plaintiff played an active role in litigation, providing  
2 documents and information to Class Counsel necessary to litigate the case.  
3 Plaintiff participated in mediation and settlement discussions on behalf of the  
4 Class, as well as in informal discovery, and in the drafting of the Complaint. Had  
5 she not done so, the class members would have received nothing, unless another  
6 consumer came forward to bring the case and was successful and achieving a  
7 settlement or judgment on behalf of the other 230,000 Class Members. Plaintiff  
8 acted dutifully in her role as a class representative, and should be awarded this  
9 reasonable sum of \$5,000 for her part in the litigation.

10 **IV. CONCLUSION**

11 For the foregoing reasons, Class Counsel respectfully request that the Court  
12 grant Plaintiff's motion for an award of attorneys' fees in the total amount of  
13 \$1,200,000, litigation costs of \$12,137.51; and a Class Representative Incentive  
14 Award of \$5,000.

15 Dated: April 22, 2019

Respectfully submitted,

16  
17 By: /s/ Todd M. Friedman

18 Todd M. Friedman (SBN 216752)  
19 Adrian R. Bacon (SBN 280332)  
20 **LAW OFFICES OF TODD M. FRIEDMAN, P.C.**

21 John P. Kristensen (SBN 224132)  
22 David L. Weisberg (SBN 211675)  
23 Christina M. Le (SBN 237697)  
24 **KRISTENSEN WEISBERG, LLP**  
*Attorneys for Plaintiff and all others*  
*similarly situated.*

25 \_\_\_\_\_  
26 <sup>14</sup> *Bellinghausen v. Tractor Supply Co.*, 306 F.R.D. 245, 266-\*67 (N.D. Cal. Mar.  
27 20, 2015); *In re Online DVD-Rental Antitrust Litigation*, 779 F.3d 934, 942-\*43  
28 (9th Cir. Feb. 27, 2015); *In re Toys R Us – Delaware, Inc. – Fair and Accurate  
Credit Transactions Act (FACTA) Litigation*, 295 F.R.D. 438, 472 (C.D. Cal. Jan.  
17, 2014).

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**PROOF OF SERVICE**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business Address is 21550 Oxnard St., Suite 780, Woodland Hills, CA 91367.

On April 22, 2019, I served the following document(s) described as: **MOTION FOR ATTORNEYS' FEES, COSTS AND INCENTIVE AWARD**, on all interested parties in this action by placing:

a true copy  
 the original thereof enclosed in sealed envelope(s) addressed as follows:

Alexandra Hill  
ahill@manatt.com  
Donald R. Brown  
dbrown@manatt.com  
Robert H. Platt  
rplatt@manatt.com  
Manatt Phelps and Phillips LLP  
11355 West Olympic Boulevard  
Los Angeles, CA 90064-1614

**BY CM/ECF:** I transmitted the document(s) listed above electronically to the e-mail addresses listed above. I am readily familiar with the Court's CM/ECF system and the transmission was reported as complete, without error.

STATE – I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 22, 2019, at Woodland Hills, California.

By: /s/ Todd M. Friedman

Todd M. Friedman



THE LAW OFFICES OF TODD M. FRIEDMAN, PC  
WOODLAND HILLS, CA 91367

1 Todd M. Friedman (SBN 216752)  
2 Adrian R. Bacon (SBN 280332)  
3 **LAW OFFICES OF TODD M. FRIEDMAN, P.C.**  
4 21550 Oxnard Street, Suite 780  
5 Woodland Hills, CA 91367  
6 Phone: 877-206-4741  
7 Fax: 866-633-0228  
8 tfriedman@toddfllaw.com  
9 abacon@toddfllaw.com  
10 *Attorneys for Plaintiff*

8 **UNITED STATE DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 LISA KIM, individually on behalf of  
11 herself and all others similarly  
12 situated,

13 Plaintiff,

14 vs.

15 TINDER, INC., a Delaware  
16 corporation; MATCH GROUP, LLC,  
17 a Delaware limited liability company;  
18 MATCH GROUP, INC., a Delaware  
19 corporation; and DOES 1 through 10,  
20 inclusive, and each of them,

21 Defendants.

Case No.: 2-18-cv-03093

**CLASS ACTION**

**DECLARATION OF TODD M.  
FRIEDMAN IN SUPPORT OF  
PLAINTIFF’S MOTION FOR  
ATTORNEYS’ FEES, COSTS  
AND INCENTIVE AWARD**

Assigned to the Hon. John F. Walter

**Date:** June 17, 2019

**Time:** 1:30 P.M.

**Place:** Courtroom 7A

**Judge:** Hon. John F. Walter

[Filed and Served Concurrently with  
Motion for Attorneys’ Fees, and Costs  
and Incentive Award; Declaration of  
John Kristensen; Declaration of Lisa  
Kim; [Proposed] Order]

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**DECLARATION OF TODD M. FRIEDMAN**

**I, TODD M. FRIEDMAN, declare:**

1. I am one of the attorneys for the plaintiff in this action, Lisa Kim (“Kim” or “Plaintiff”). I am an attorney licensed to practice law in the State of California since 2001, the State of Illinois since 2002, and the State of Pennsylvania since 2011. I have been continuously licensed in California since 2001, Illinois since 2002, and Pennsylvania since 2011, and am in good standing with the California State Bar, Illinois State Bar, and Pennsylvania State Bar. I have litigated cases in both state and federal courts in California, Colorado, Florida, Ohio and Illinois. I am also admitted in every Federal district in California and have handled federal litigation in the federal districts of California.
2. The declaration is based upon my personal knowledge, except where expressly noted otherwise.
3. I submit this declaration in support of the Plaintiff’s Motion for Attorneys’ Fees and Costs, and Plaintiff’s Incentive Award.

**CASE HISTORY**

4. This case began long before the instant action was filed. Originally, on March 6, 2015, my office filed a class action against Defendant Tinder, Inc. on behalf of our client Billy Warner, in the matter of *Billy Warner v. Tinder, Inc.* Case No. 2:15-cv-01668-MMM-AJW, Central District Court of California. The case was assigned to Judge Margaret Morrow (ret.). It was in the course of the *Warner* case, that the theory that ultimately was resolved in the instant matter, was first uncovered, developed, and litigated. See Dkt. No. 13 of Case No. 2:15-cv-01668-MMM-AJW (The Second Amended Complaint – filed April 20, 2015). It is important to note that my office was the first to formulate and assert the Unruh Act theories that gave rise to this class action lawsuit.

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- 1 5. We filed a follow up action with a California Plaintiff in the case of *Manapol*  
2 *v Tinder, Inc.*, Case No. BC589036, Los Angeles Superior Court. We took  
3 these actions after Defendant challenged Warner’s right to bring an Unruh  
4 Act claim due to the fact that he was a Florida resident.
- 5 6. The *Warner* action was subject to a motion to dismiss, based on numerous  
6 challenges, primarily regarding Rule 9 particularity, challenges based on  
7 Warner being a Florida resident not subject to California Law, and challenges  
8 that the alleged conduct was not unlawful. These challenges were met with  
9 varying degrees of success, with the motion being granted, with leave to  
10 amend.
- 11 7. Part of the Order on the Motion to Dismiss held that Warner should be  
12 bringing his claims under Florida law, not California law. We refiled the  
13 *Warner* action in Florida District court in the case of *Warner v. Tinder, Inc.*,  
14 U.S. District Court for the Southern District of Florida, Case No. 15-cv-  
15 23790-JLK (filed October 9, 2015). After filing, Defendant filed a renewed  
16 Motion to Dismiss. The court took the matter under submission and *sua*  
17 *sponte* dismissed the action with prejudice for forum shopping. We appealed  
18 to the Eleventh Circuit for abuse of discretion and prevailed. See *Warner v.*  
19 *Tinder, Inc.*, Case No. 16-10537 675 Fed.Appx. 945 (11<sup>th</sup> Cir. Jan. 17, 2017).  
20 The case was later resolved during early discovery. Defendant was  
21 represented by the same counsel in the *Warner* and *Manapol* actions as in  
22 this action.
- 23 8. I bring up this backstory to explain the full history of the litigation between  
24 my office and Defendant relating to the theories which gave rise to this  
25 action. This is important because the diligence that went into my office filing  
26 the instant matter goes back over four years. We put a significant amount of  
27 time into this case going back far earlier than the filing of the *Kim* action.  
28 While the costs and fees expended during the *Warner* and *Manopla* actions

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- 1 are not being included in the instant fee petition, the context is important for  
2 This Court to consider in finally approving settlement and the proposed fees.
- 3 9. Plaintiff filed the initial class action complaint (“Complaint”) on April 12,  
4 2018. In the Complaint, Plaintiff alleged one cause of action for a violation  
5 of the California Unruh Civil Rights Act. Based on those allegations,  
6 Plaintiffs restitution, statutory damages, as well as injunctive relief.  
7 Plaintiffs’ claims were brought on behalf of a class of individuals who were  
8 over the age of 30, but did not receive a discount for the Tinder plus service  
9 based on their age. (Dkt. No. 1.)
- 10 10. The parties filed a joint stipulation on May 3, 2018, extending Defendants’  
11 time to respond to Plaintiff’s Complaint to June 11, 2018.
- 12 11. Defendants filed a Motion to Compel Arbitration or in the Alternative, stay  
13 the Case on June 11, 2018. (Dkt. No. 24.)
- 14 12. Plaintiff filed a First Amended Complaint on June 22, 2018, asserting an  
15 additional cause of action under the Unfair Competition Law, Cal. Bus. &  
16 Prof. Code §§ 17200 *et. seq.* (“UCL”). Plaintiffs sought restitution and  
17 injunctive relief under this claim. (Dkt. No. 30.)
- 18 13. After extensive briefing in Defendant’s Motion, This Honorable Court  
19 granted the Motion to Compel Arbitration on July 12, 2018. (Dkt. No. 44.)
- 20 14. On July 13, 2018, Plaintiff filed a notice of appeal regarding said order to the  
21 Ninth Circuit Court of Appeals. (Dkt. No. 46.)
- 22 15. During the appellate process and before full briefing on the appeal, both  
23 parties engaged in informal settlement discussions and eventually agreed to  
24 mediate this matter on a class wide basis.
- 25 16. Thereafter, the Parties engaged in informal discovery, including the exchange  
26 of documents in order to determine the size and other aspects of a proposed  
27 class-wide settlement, as well as information about the number of class  
28 members who signed arbitration agreements, and the policies and practices

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1 of Defendants.

2 17. On November 19, 2018 both parties attended a mediation in Los Angeles,  
3 CA with the Hon. Louis M. Meisinger (Ret.) at Signature Resolution. My  
4 office prepared a mediation brief, extensively reviewing the law and the facts,  
5 as yielded by the evidence to date, along with several pages of exhibits.  
6 Defendant submitted a similar brief. After a full day of mediation which  
7 lasted late into the evening, both parties were able to resolve this matter on a  
8 class wide basis.

9 18. Defendants strongly contested both the legal and factual issues in this matter,  
10 as evidenced by it Motion to Compel Arbitration, which was granted by this  
11 Honorable Court. (Dkt. No. 44.) Defendant further contested class  
12 certification on numerous grounds as well.

13 19. With Judge Meisinger’s guidance, a Settlement Agreement and Release  
14 (“Settlement Agreement”) was ultimately agreed upon in principle by the  
15 Parties.

16 20. Plaintiff seeks the Court’s approval of the following to be paid by Defendant  
17 pursuant to the terms of the Settlement Agreement:

- 18 i. Attorneys’ fees in the amount of \$1,200,000, representing a sum
- 19 of approximately 5% of the Settlement benefits available to Class
- 20 Members;
- 21 ii. Costs of litigation incurred by Class Counsel in the amount of
- 22 \$12,137.51 as of April 22, 2019; and
- 23 iii. An Incentive Award to Plaintiff in the amount of \$5,000.

24 THE PRELIMINARY APPROVAL ORDER

25 21. Plaintiff moved for Preliminary Approval of the settlement. On March 1,  
26 2019, The Honorable Court granted Preliminary Approval. Dkt. No. 60. The  
27 Court found that

28 22. The Court granted Plaintiff’s proposed deadlines and proposed Class Notice

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1 on March 12, 2019. Dkt. No. 62. In doing so, the Court conditionally  
2 certified the following Settlement Class:

3 Every person in California who subscribed to Tinder Plus or  
4 Tinder Gold during the period between March 2, 2015 and March  
5 1, 2019 and at the time of the subscription was at least 29 years  
6 old and was charged a higher rate than younger subscribers,  
7 except those who timely opt out of the Settlement Class

8 23. The Court approved Plaintiff’s counsel as Class Counsel and appointed Epiq  
9 to administer the Settlement. The Court went to great lengths in a very  
10 detailed order to look into all of the fairness factors under Rule 23(4e) and  
11 found, among other things: 1) that the proposed settlement was fair and  
12 adequate to absent Class Members, and 2) the proposed settlement was free  
13 from collusion. The Court came to this conclusion after evaluating the *In RE*  
14 *Bluetooth* factors. See Dkt. No. 60. The only factors which have yet to be  
15 evaluated are the reaction of the Class Members to the proposed settlement,  
16 and, at least in part, the reasonableness of the attorney fee request. The Court  
17 set a deadline of April 22, 2019 for Class Counsel to file a fee petition.

18 ADMINISTRATION AND CLASS RESPONSE

19 24. On April 5, 2019, Epiq disseminated the Class Notice to Class Members via  
20 email, as was approved as the best notice practicable by This Honorable  
21 Court. The email campaign was highly successful at delivering targeted  
22 notice directly to the hands of Class Members, who almost certainly all used  
23 smartphone devices hooked to these same email accounts as part of their  
24 everyday life.

25 25. Epiq reported that approximately 85% of the Class Members received direct  
26 notice, a much higher threshold than the Rule 23 guidelines specify for due  
27 process purposes. That benchmark is around 70% reach, and Class Counsel  
28 was pleased that we were significantly over target.

26. Epic was able to send 240,592 emails to Class Members, with 203,741 of

1 those emails delivered. Email addresses for all but 19 of the Class Members  
2 were located in Tinder's records.

3 27. Since that time, neither Plaintiffs' counsel nor Defense counsel have received  
4 any objections from absent Class Members.

5 28. My office has received several inquiries from Class Members regarding the  
6 settlement, and promptly responded to all inquiries.

7 29. Only one individual to date has expressed any interest in opting out of the  
8 settlement and indicated that he would be sending us an opt out notice.

9 30. I consider the foregoing to be both a considerably favorable amount of reach  
10 achieved with the Class Notice, as well as a favorable reaction to the  
11 Settlement by Class Members thus far.

12 CLASS COUNSEL'S EXPERIENCE

13 31. The Law Offices of Todd M. Friedman, P.C. has been preliminarily  
14 appointed as Class Counsel in this Action. I am informed and believe that  
15 Class Counsel are qualified and able to conduct this litigation as a class  
16 action.

17 32. As one of the main plaintiff litigators of consumer rights cases in Southern  
18 of California, I have been requested to and have made regular presentations  
19 to community organizations regarding debt collection laws and consumer  
20 rights.

21 33. I have extensive experience prosecuting cases related to consumer issues.  
22 My firm, The Law Offices of Todd M. Friedman, P.C., in which I am a  
23 principal, has litigated over 1000 individual based consumer cases and  
24 litigated over 200 consumer class actions. These class actions were litigated  
25 in federal courts in California, as well as California State Courts.  
26 Approximately 100% percent of my practice concerns consumer litigation in  
27 general, with approximately 90% of my class action experience involving  
28 consumer protection, and approximately 30% percent of my class action



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1 practice involves litigating claims under the UCL.

2 34. My firm has numerously been approved by courts as adequate class counsel,  
3 and is highly experienced in litigating UCL class actions. My office recently  
4 was granted class action status in the case of *Anne Wolf v Hewlett Packard*  
5 *Company*, Case No. 5:15-cv-01221-TJH-GJS (C.D. Cal.). The case was a  
6 UCL/FAL/CLRA class action against HP, which we successfully certified by  
7 contested motion, and thereafter resolved favorably on behalf of the Class  
8 Members on a claims made basis, with a similar structure to this case. Final  
9 approval of the settlement was recently granted by Judge Hatter. My firm is  
10 also currently litigating several Unruh Act/UCL class actions, and have  
11 successfully brought over a dozen individual cases under the Unruh Act. The  
12 certification and merits theory in this case was developed primarily by my  
13 office over the course of several years, and with a great deal of experience  
14 and effort.

15 35. My experience in litigating class actions and my years in practice allow me  
16 to provide outstanding representation to the Settlement Class. I will continue  
17 to strive to fairly, responsibly, vigorously and adequately represent the  
18 putative class members in this action.

19 36. The Law Offices of Todd M. Friedman has served as plaintiff's counsel in at  
20 least the following class action cases involving various class actions claims  
21 consumer rights claims, where a settlement was reached on a class-wide  
22 basis, and have achieved over \$160,000,000 in class-wide relief for  
23 consumers:

- 24 a. *Dancer v. L.A. Times*, BC472154 (L.A. Superior Court) (common fund  
25 class-wide settlement of \$3 million to \$4 million granted final  
26 approval);



- b. *Couser v. Comenity Bank*, 3:12-cv-02484-MMA-BGS (S.D. Cal.) (\$8.475 million class-wide settlement achieved and granted final approval);
- c. *Stemple v. QC Financial Services Group of California, Inc.*, 3:12-cv-01997-CAB-WVG (S.D. Cal.) (certified class achieved by motion, and subsequent class-wide settlement of \$1.5 million achieved, with final approval granted);
- d. *Couser v. Apria Healthcare, Inc.* 8:13-cv-00035-JVS-RNB (C.D. Cal.) (common fund class-wide settlement of \$400,000 to \$750,000, granted final approval);
- e. *Abdeljalil v. General Electric Capital Corporation*, 12-CV-02078-IEG-RBB (S.D. Cal.) (class-wide settlement with common fund of \$6.125 million achieved, preliminary approval granted, final approval granted);
- f. *Fox v. Asset Acceptance*, 3:13-CV-00922-DMS-BGS (S.D. Cal.) (common fund of \$1 million in class-wide relief achieved, granted final approval);
- g. *Friedman v. LAC Basketball Club, Inc.*, 2:13-cv-00818-CBM-AN (C.D. Cal.) (class-wide settlement achieved and granted final approval);
- h. *Gerich et al. v. Chase Bank USA et al.* Case No 1:12-cv-5510 (N.D. Ill.) (class-wide settlement of \$34 million, granted final approval);
- i. *Than Zaw v Nelnet, Inc.*, Penal Code § 632 class – (Achieved class-wide settlement of \$1,188,110, granted final approval of court);
- j. *Medeiros v HSBC*, (common fund settlement of between \$4.5 million and \$6.5 million achieved, final approval granted);

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- 1 k. *Ann Fox v. Spectrum Club Holding Company et al.*, Case No. 2:14-  
2 CV-06766-PSG-FFMx (class-wide settlement, final approval  
3 granted);
- 4 l. *Sayan Aboudi v. T-Mobile USA, Inc.*, Case No. 3:12-cv-02169-BTM-  
5 NLS (class-wide settlement in TCPA case, with common fund of \$2.5  
6 million to \$5 million, with average per class member payment of \$500,  
7 final approval granted);
- 8 m. *Andrew Roseman v. BGASC, LLC, et al.*, Case No. EDCV 15-1100-  
9 VAP (SPx) (C.D. Cal.) (class-wide relief achieved, final approval  
10 granted);
- 11 n. *Everado Gonzalez v The Scotts Company*, Case No. BC577875,  
12 Consolidated with Case No: BC570350 (LASC) (class-wide  
13 settlement of \$925,000 in wage and hour class action on behalf of  
14 approximately 603 employees achieved, final approval granted);
- 15 o. *Payton v Luxe Valet*, Case No. BC588462 (LASC) (class-wide  
16 settlement in wage and hour independent contractor misclassification  
17 class action, on behalf of 1,800 employees, settled for \$2.4 million,  
18 final approval granted);
- 19 p. *Shelby v Two Jinn, Inc.*, Case No. 2:15-cv-03794-AB-GJS (C.D. Cal.)  
20 (EFTA class action involving no cognizable actual damages, with net  
21 worth of company of \$25 million, settled for non-reversionary  
22 common fund of \$457,000, despite liability under 15 U.S. Code §  
23 1693m(a) likely being only \$250,000; final approval granted, zero  
24 objections);
- 25 q. *Couser v Dish One Satellite*, Case No. 5:15-cv-02218-CBM-DTB  
26 (C.D. Cal.) (TCPA class action, final approval granted);
- 27 r. *Couser v Dish One Satellite*, Case No. RIC 1603185 (Riverside S.C.)  
28 (Penal Code 632 class action, preliminary approval granted);

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- 1 s. *De La Paz v Accurate Courier NCA LLC*, Case No. 16CV00555 (Santa  
2 Cruz County Superior Court) (PAGA and Labor Code class action,  
3 final approval granted);
- 4 t. *Ross v Zurixx LLC*, Case No. 34-2016-00190874 (Sacramento SC)  
5 (UCL, FAL and CLRA class action alleging false advertising for real  
6 estate educational courses, non-reversionary common fund settlement  
7 for over \$600 per class member, final approval granted);
- 8 u. *Eubank v Terminix International, Inc.*, Case No. 3:15-cv-00145-  
9 WQH-JMA (PAGA settlement reached in wage and hour action on  
10 behalf of pest control technicians, final approval granted);
- 11 v. *Holland v Tenet Healthcare Corporation*, Case No. 15CVP0226  
12 (Superior Court of San Luis Obispo County) (PAGA settlement  
13 reached in wage and hour action on behalf of nurses, final approval  
14 granted);
- 15 w. *Jonathan Weisberg, v. HD Supply, Inc.*, Case No. 15-cv-08248-FMO  
16 (MRWx) (class-wide settlement in TCPA class action, settled for  
17 \$1.225 million, final approval granted);
- 18 x. *Miler v Pacific Auto Wash Partners*, Case No. 30-2015-00813013-  
19 CU-OE-CXC (wage and hour class action, final approval granted);
- 20 y. *Sonia Barrientos v Law Office of Jeffrey H. Jordan*, Case No. 2:15-cv-  
21 06282-JAK-GJS (FDCPA/RFDCPA letter class action, settled on class  
22 wide basis, final approval granted);
- 23 z. *Tahmasian v Midway Rent A Car*, Case No. 30-2015-00813013-CU-  
24 OE-CXC (LASC) (PAGA and Labor Code class action, final approval  
25 granted);
- 26 aa. *Craig Cunningham v Lexington Law Firm*, Case No. 1:17-cv-00087-  
27 EJF (N.D. UT) (TCPA class action MDL involving solicitation  
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1 prerecorded voice calls made by a third party, vicarious liability  
2 alleged, preliminary approval pending).

3 bb. *Sheena Raffin v Medicredit, Inc.*, et al., Case No. 2:15-cv-04912-  
4 MWF-PJW (C.D. Cal.) (Cal. Penal Code § 632.7 class action certified  
5 by Hon. George H. King Ret under Rule 23(b)(2) and (b)(3) by  
6 contested motion on behalf of 11,000 class members whose calls were  
7 recorded without knowledge or consent, settled for \$5 million, final  
8 approval granted);

9 cc. *Fernandez v Reliance Home Services, Inc.* Case No. BC607572 Los  
10 Angeles Superior Court (wage and hour plus PAGA class action, final  
11 approval granted);

12 dd. *Anne Wolf v Hewlett Packard Company*, Case No. 5:15-cv-01221-  
13 TJH-GJS (C.D. Cal.) (CLRA class action certified by contested motion  
14 on behalf of tens of thousands of class members who purchased printer  
15 that was falsely advertised to include Smart Install feature, settled on  
16 a wider multi-state, multi-product basis, final approval granted);

17 ee. *Jaylinda Girardot et al v. Bail Hotline Bail Bonds, Inc.*, Case No.  
18 BC700131 Los Angeles County Superior Court (wage and hour plus  
19 PAGA class action, final approval granted);

20 ff. *Ryoo Dental, Inc. v OCO Biomedical, Inc.*, Case No. 8:16-cv-01626-  
21 DOC-KES (TCPA fax blast class action, settled on class wide basis,  
22 final approval granted);

23 gg. *Wondra Curtis v The Anthem Companies, Inc.*, Case No. 8:16-cv-  
24 01654-DOC-JCG (wage and hour class action for off the clock work,  
25 settled on class wide basis, final approval granted);

26 hh. *Weinberg v Clariant, Inc.* Case No. 56-2017-00494914-CU-NP-VTA  
27 Ventura County Superior Court (Rosenthal Fair Debt Collection  
28 Practices Act class action settled on behalf of 1,830 class members for

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- 1 privacy infringements through clear envelope debt collection letters,  
2 final approval granted);
- 3 ii. *Aliav v Sunset Eats, LLC*, Case No. BC655401 Los Angeles Superior  
4 Court (false advertising class action on behalf of approximately 10,000  
5 class members, settled on class wide basis; preliminary approval  
6 pending);
- 7 jj. *Alfred Zaklit, et al. v. Nationstar Mortgage LLC*, Case No. 5:15-cv-  
8 02190-CAS-KK (C.D. Cal.) (Cal. Penal Code § 632.7 class action  
9 certified by contested motion under Rule 23(b)(2) and (b)(3) on behalf  
10 of over 40,000 class members whose calls were recorded without  
11 knowledge or consent, preliminary approval pending);
- 12 kk. *Mark Silva v. Olson and Co. Steel* Case No. 17CV001045 Contra  
13 Costa County Superior Court (wage and hour class action settled on  
14 behalf of 563 class members, preliminary approval granted);
- 15 ll. *Richards v. CoreCivic of Tennessee, LLC*, Case No. 1:17-cv-01094-  
16 LJO-JLT (E.D. Cal.) (wage and hour class action settled for  
17 approximately \$3 million, preliminary approval pending);
- 18 mm. *Manopla v. Home Depot USA, Inc.* Case No. 15-1120 (D. N.J.)  
19 (TCPA class action, preliminary approval pending);
- 20 nn. *Bonilla et al. v. Windsor Fashion, LLC* Case No. CIVDS1723088  
21 (wage and hour class action settled on behalf of over 5,000 employees,  
22 preliminary approval pending);
- 23 oo. *Cawthorne v Rush Truck Centers of California, Inc.* Case No. 5:17-cv-  
24 01541-JGB-SP (wage and hour class action on behalf of 560  
25 employees, preliminary approval granted);
- 26 pp. *Lizama v Medical Data Systems, Inc.* Case No. 34-2017-00210986-  
27 CU-NP-GDS (Sacramento County Superior Court) (Penal Code 632.7  
28

1 class action alleging illegal call recording, settled for \$2.2 million on  
2 behalf of over 30,000 consumers, preliminary approval pending);  
3 qq. *Romano v SCI, Inc.* Case No. 2:17-cv-03537-ODW-JEM (wage and  
4 hour class action for independent contractor misclassification, settled  
5 for \$2.5 million on behalf of 230 employees, preliminary approval  
6 pending);  
7 rr. *Caldera v. American Medical Collection Association*, (C.D. Cal.) Case  
8 No. 2:16-cv-00381-CBM-AJW (TCPA class action certified by  
9 contested motion, settled on a Rule 23(b)(2) basis for classwide  
10 injunctive relief, preliminary approval pending);  
11 ss. *Edward Makaron v. Enagic USA, Inc.*, Case No. 2:15-cv-05145-DDP-  
12 E (C.D. Cal.) (TCPA class action certified on behalf of approximately  
13 2,000,000 class members under Rule 23(b)(2) and 23(b)(3),  
14 subsequently settled on a Rule 23(b)(2) and 23(b)(3) basis, preliminary  
15 approval pending);  
16 tt. *Audrey Hernandez v. Pegasus Building Services, Inc.*, SDSC Case No.  
17 37-2018-00023176-CU-OE-CTL (consolidated wage and hour and  
18 PAGA class action on behalf of janitorial workers, preliminary  
19 approval pending);  
20 uu. *Walsh v Fry's Electronics, Inc.* Case No. MSC18-01681 (Contra Costa  
21 County Superior Court) (Gift Card Act, CLRA, UCL, FAL class action  
22 settled for class-wide public injunctive relief, preliminary approval  
23 pending);  
24 vv. *In RE HP Firmware Update Litigation*, Case No. 5:16-cv-05820-EJD  
25 (N.D. Cal.) (co-lead class counsel in consolidated Unfair Competition  
26 class action alleging HP pushed a firmware update on consumers'  
27 printers that blocked their ability to use third party ink cartridges,  
28 preliminary approval granted, final approval pending);



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ww. *Nishimoto v T&S Business Corporation*, Case No. 34-2017-00211426 (Sacramento County Superior Court) (wage and hour and PAGA class action on behalf of janitorial workers, preliminary approval pending);

xx. *Rodriguez v. Experian Information Solutions, Inc. et. al.* Case No. 2:15-cv-01224-RAJ (W.D. Wash.) (FCRA class action for improper credit pulls; certified under Rule 23 by contested motion, and settled on class-wide basis, preliminary approval pending);

yy. *Ahmed v HSBC Bank USA*, Case No. 5:15-cv-02057-FMO (SPx) (C.D. Cal.) (TCPA class, preliminary approval pending);

zz. *Garcia et. al. v. HMS Host, Inc.*, Case Jo. 17-cv-03069-RS (N.D. Cal.) (wage and hour class action, preliminary approval granted); and

aaa. *Aiken v. Malcolm Cisneros, A Law Corporation*, Case No. 5:17-cv-02462-JLS-SP (C.D. Cal.) (Fair Debt Collection Practices Act class action, settled on class wide basis, preliminary approval pending).

37. My firm also certified the following cases as class actions under Rule 23 by contested motion and was appointed class counsel:

- a. *Anne Wolf v Hewlett Packard Company*, Case No. 5:15-cv-01221-TJH-GJS (C.D. Cal.) (class action certified by contested motion on behalf of tens of thousands of class members who purchased printer that was falsely advertised to include Smart Install feature);
- b. *Caldera v. American Medical Collection Association*, (C.D. Cal.) Case No. 2:16-cv-00381-CBM-AJW (TCPA class action certified by contested motion)
- c. *Alfred Zaklit, et. al. v. Nationstar Mortgage LLC*, Case No. 5:15-cv-02190-CAS-KK (C.D. Cal.) Cal. Penal Code § 632.7 class action certified under Rule 23(b)(2) and (b)(3) on behalf of class members whose calls were recorded without knowledge or consent);

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- d. *D'Angelo Santana vs Rady Children's Hospital*, Case No. 37-2014-00022411-CU-MT-CTL (San Diego Superior Court) Confidentiality of Medical Information Act, Cal. Civ. Code § 56 *et seq.*;
- e. *Edward Makaron v. Enagic USA, Inc.*, Case No. 2:15-cv-05145-DDP-E (C.D. Cal.) (TCPA class action certified on behalf of approximately 2,000,000 class members under Rule 23(b)(2) and 23(b)(3)); and
- f. *Rodriguez v. Experian Information Solutions, Inc. et. al.* Case No. 2:15-cv-01224-RAJ (W.D. Wash.) (FCRA class action for improper credit pulls; certified under Rule 23).
- g. *Sheena Raffin v Mediacredit, Inc. et. al.*, Case No. 2:15-cv-04912-MWF-PJW (C.D. Cal.) (Cal. Penal Code § 632.7 class action certified by Hon. George H. King Ret. under Rule 23(b)(2) and (b)(3) on behalf of class members whose calls were recorded without knowledge or consent);
- h. *Stemple v. QC Financial Services Group of California, Inc.*, 3:12-cv-01997-CAB-WVG (S.D. Cal.) (certified class achieved by motion, and subsequent class-wide settlement);
- i. *Abdeljalil v. General Electric Capital Corporation*, 12-CV-02078-IEG-RBB (S.D. Cal.) (certified class achieved by motion, and subsequent class-wide settlement); and
- j. *McCurley and Deforest v Royal Seas Cruises, Inc.* Case No. 17-cv-00986-BAS-AGS (certified class achieved by motion in TCPA class action on behalf of over 2 million class members).

II. Overview of Law Offices of Todd M. Friedman, P.C.'s Efforts in this Action

A. CONTINGENT NATURE OF ACTION

38.Plaintiff filed the initial class action complaint (“Complaint”) on April 12, 2018. Dk. No. 1. As described above, that is hardly when the investigation

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1 or efforts surrounding the theories which gave rise to this case were first  
2 uncovered, investigated, or litigated by my office. This settlement is a result  
3 of four years of diligence, and my office was the first to assert the claims that  
4 were resolved on behalf of the Class Members.

5 39. In the Complaint, Plaintiff alleged causes of action for violations of the UCL  
6 and Unruh Act stemming from allegedly unlawful price discrimination in the  
7 Tinder App based on age. Based on these allegations, Plaintiff sought  
8 monetary relief as well as injunctive relief on behalf of the Class and  
9 members of the California Public.

10 40. The history of the case is described above in my Declaration and is further  
11 evident from the docket and from the docket of the Warner actions. However  
12 it is important to note that this case was brought on a contingency basis, with  
13 my office and my co-counsel's office having advanced all costs of litigation,  
14 time and effort to date on behalf of the Class Members, without having been  
15 paid anything. The case was brought purely on contingency.

16 41. As evidenced by the record of the case, including the Court's ruling granting  
17 the motion to compel arbitration, Defendant strongly contested the legal issues  
18 in this matter, and had legitimate procedural defenses which my office was  
19 contesting on appeal, but which could have been upheld, either in whole or in  
20 part, by the Ninth Circuit. If that had occurred, the Class Members would  
21 have received nothing, as such a ruling in Defendant's favor on appeal would  
22 have completely dispensed with the class action claims.

23 42. This action, required the Law Offices of Todd M. Friedman, P.C. to spend  
24 time and money on this litigation that could have been spent on other matters.  
25 At various times during the litigation of this class action, this lawsuit has  
26 consumed my time as well as my firm's resources. Over 2,000 emails have  
27 been exchanged during that time between members of my firm, co-counsel,  
28

1 counsel for Defendant, the claims administrator, class members, Plaintiff, our  
 2 experts, and others. Plaintiff's Counsel have not been paid anything for our  
 3 work on this case since it was filed and we have spent over \$12,137.51 in  
 4 hard costs prosecuting this action on behalf of Plaintiff and the proposed  
 5 class. I run a relatively small law firm, which carries a high case volume.  
 6 Currently we are appointed Class Counsel in dozens of cases that are in  
 7 various stages of either litigation or settlement proceedings, and we are  
 8 actively litigating well over 100 pending cases, many of which are class  
 9 actions. Those cases all require oversight and effort. An expenditure of time  
 10 and costs in a hotly contested case such as this one is a risk that we took for  
 11 the sake of standing up for the Class. It is my opinion that law firms in such  
 12 a position expect to receive a multiplier in cases such as these because of the  
 13 risk taken, the extent to which firms are unable to take on other cases, the  
 14 delay in getting paid and the costs we have to advance.

15 **B. LAW OFFICES OF TODD M. FRIEDMAN, P.C.'S LODESTAR**

16 43. Law Offices of Todd M. Friedman, P.C. has maintained contemporaneous  
 17 time records since the commencement of this action. To date, I have incurred  
 18 330.60 hours of attorney time for this case,<sup>1</sup> with a total lodestar of  
 19 \$212,521.50. This figure does not include the estimated hours for preparing  
 20 the final approval hearing papers, responding to any objectors, appearing at  
 21 the hearing and overseeing the settlement administration. I anticipate my firm  
 22 will expend approximately 100-150 hours working on these matters, in  
 23 addition to the hours described herein. My billing rate is \$725 per hour in this  
 24 case, the billing rate for Adrian R. Bacon is \$625 per hour, the billing rate for

25 \_\_\_\_\_  
 26 <sup>1</sup> In calculating these hours, I have excluded time spent by legal clerks and  
 27 paralegals. While dozens of hours' worth of time were spent by such individuals on  
 28 this case, we have not included those hours in the lodestar calculation, because the  
 lodestar of just the attorneys comprise enough billable time as to reach a lodestar  
 cross-check amount roughly equivalent to the amount of attorney's fees requested.

1 Thomas E. Wheeler is \$370 per hour, and the billing rate for various  
2 paralegals from my office is \$175 per hour.

3 **C. LAW OFFICES OF TODD M. FRIEDMAN, P.C.'S COSTS**

4 44. My firm has incurred litigation costs in this matter in the amount of  
5 \$5,547.55, for which my firm is seeking reimbursement. These costs are  
6 comprised of costs for filing and serving the complaint, transmitting copies  
7 of ECF filings to the Honorable Court, payment of mediation fees to Judge  
8 Meisinger, and appeal costs. The breakdown of costs is as follows:

Description	Cost
Payment of Mediation Fee	\$4,725.00
Parking Fees	\$45.40
Mileage Expenses	\$62.90
Appeal Filing Fee	\$505
Filing fees Courtesy Copies via one Legal	\$209.25
<b>TOTAL - LOTF</b>	<b>\$5,547.55</b>
<b>TOTAL - KRISTENSEN WEISBERG</b>	<b>\$6,589.96</b>
<b>TOTAL PLAINTIFF'S COUNSEL</b>	<b>\$12,137.51</b>

16 45. Should my firm incur costs through final approval of this action, Plaintiff will  
17 seek reimbursement of such costs, as set forth in the Settlement Agreement.  
18 If there are any objectors to the Settlement, my office reserves the right to  
19 take their depositions, which would be an additional expense (there have been  
20 no objectors to date). Importantly, regardless of the costs that my firm incurs  
21 or is reimbursed through a Court Order, such costs will be borne solely by  
22 Defendant, and will not detract from Class Members' recoveries.

23 **D. REASONABLENESS OF HOURLY RATES**

24 46. Law Offices of Todd M. Friedman, P.C.'s hourly rates are reasonable in  
25 respect to the ranges charged by comparable law firms in the State of  
26 California.<sup>2</sup> My billing rate is \$725 per hour in this case, the billing rate for  
27

28 <sup>2</sup> See Laffey Matrix attached hereto as Exhibit B.

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1 Adrian R. Bacon is \$625 per hour, the rate of Thomas E. Wheeler is \$370 per  
2 hour, and the rate for paralegals is \$175 per hour.

3 47.Regarding my rate, I have been practicing law since 2001, and am the  
4 managing partner of one of the most active consumer protection law firms in  
5 California. I have been counsel of record on hundreds of class action  
6 lawsuits, over 50 of which have resolved on a class-wide basis, and  
7 approximately 10 of which were certified by contested motion after  
8 considerable litigation.

9 48.The hourly rates sought herein have been approved by numerous courts.  
10 Recently in the case of *Sheena Raffin v Medicredit, Inc. et. al.*, Case No. 2:15-  
11 cv-04912-MWF-PJW (C.D. Cal.), Judge Fitzgerald of the Central District of  
12 California explicitly found that my rate of \$725 and Mr. Bacon’s rate of \$625  
13 per hour, Mr. Wheeler’s rate of \$370 per hour and a rate of \$175 for our law  
14 clerks were all reasonable. The court awarded us fees and granted final  
15 approval of a class action settlement, which my office had litigated for over  
16 three years. Our fees were also recently approved as reasonable at these same  
17 rates in the case of *Jaylinda Girardot et al v. Bail Hotline Bail Bonds, Inc.*,  
18 Case No. BC700131 Los Angeles County Superior Court, where Judge Berle  
19 found at oral argument that our hourly rates were fair and reasonable and  
20 granted approval. Judge Hayes of the Southern District of California recently  
21 granted our fee petition in a PAGA settlement that my office oversaw. The  
22 court approved our hourly rates at the same rates sought in this matter and  
23 found in pertinent part: “The attorneys’ fees and costs sought are reasonable  
24 and appropriate. The rates that Plaintiff’s Counsel have charged are  
25 reasonable and within the range of rates customarily charged by attorneys of  
26 comparable skill, qualifications, and experience.” See *Eubank v. Terminix*  
27 *International, LLC*, Case No. 3:15-cv-00145-WQH-LL (CA. S.D.) Dkt. No.  
28 76. Mr. Bacon’s hourly rate of \$625 was also recently approved in a motion



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1 for sanctions he filed against a defendant in the case of *Fryt v. SRBV Staffing,*  
2 *LLC* Case No. BC682078 Los Angeles Superior Court.

3 49. My partner Adrian R Bacon is the head of litigation at my firm. He has been  
4 practicing law since 2011, and has practiced primarily class action litigation.  
5 He began working on consumer protection class action litigation, including  
6 extensive work on the Toyota Unintended Acceleration Litigation. Mr.  
7 Bacon played a pivotal role in drafting numerous complex class action briefs  
8 in his first year of practice, including drafting significant portions of the  
9 briefs in notable cases such as *Nguyen v. Barnes & Noble, Inc.*, 2012 WL  
10 3711081 (C.D. Cal. August 28, 2012) affirmed at *Nguyen v. Barnes & Noble*  
11 *Inc.*, 763 F.3d 1171 (9<sup>th</sup> Cir. 2014), and *Corvello v. Wells Fargo Bank, NA*,  
12 728 F.3d 878 (9<sup>th</sup> Cir. 2013).

13 50. In only his third year of practice he was approved as class counsel, at an  
14 hourly billing rate of \$475 per hour in three class action matters that were  
15 granted final approval:

16 a. *Miller v. Ikea California, LLC* , Case No.: 30-2009 00331682,  
17 California Superior Court County of Orange (\$5.75M class settlement  
18 granted final approval and motion for fees and approved at a rate of  
19 \$475 per hour);

20 b. *David Paiva et al v. Denny Corporation et al.*, Case No. 37-2010-  
21 00103831-CU-OE-CTL, California Superior Court County of San  
22 Diego (granted final approval and motion for fees and approved at a  
23 rate of \$475 per hour); and

24 c. *Juan Martinez et al v. Valley Pride, Inc. et al.*, Case No. M108688,  
25 California Superior Court County of Monterey

26 51. Mr. Bacon is responsible for drafting and filing the majority of the Complex  
27 Motions filed by my firm in Class Action cases, as well as managing  
28

1 discovery, taking depositions and overseeing and engaging in virtually every  
2 aspect of litigation as either lead or co-lead counsel in hundreds of active  
3 cases handled by my firm. He also oversees and managers the firm's Orange  
4 County office. My office recently successfully achieved class certification  
5 by contested motion in six hotly contested class actions, the motions for  
6 which Mr. Bacon took point in drafting:

- 7 a. *Sheena Raffin v Mediacredit, Inc.* et. al., Case No. 2:15-cv-04912-  
8 MWF-PJW (C.D. Cal.);
- 9 b. *Anne Wolf v Hewlett Packard Company*, Case No. 5:15-cv-01221-  
10 BRO-GJS (C.D. Cal.) (CLRA class action certified on behalf of tens of  
11 thousands of class members who purchased printer that was falsely  
12 advertised to include Smart Install feature);
- 13 c. *Caldera v. American Medical Collection Association*, (C.D. Cal.) Case  
14 No. 2:16-cv-00381-CBM-AJW (TCPA class action on behalf of  
15 30,000-100,000 class members, certified by contested motion); and
- 16 d. *Alfred Zaklit, et. al. v. Nationstar Mortgage LLC*, Case No. 5:15-cv-  
17 02190-CAS-KK (C.D. Cal.) Cal. Penal Code § 632.7 class action  
18 certified under Rule 23(b)(2) and (b)(3) on behalf of approximately  
19 70,000 class members whose calls were recorded without knowledge  
20 or consent);
- 21 e. *Edward Makaron v. Enagic USA, Inc.*, Case No. 2:15-cv-05145-DDP-  
22 E (C.D. Cal.) (TCPA class action certified on behalf of approximately  
23 1,000,000 class members under Rule 23(b)(2) and 23(b)(3)); and
- 24 f. *McCurley and Deforest v Royal Seas Cruises, Inc.* Case No. 17-cv-  
25 00986-BAS-AGS (certified class achieved by motion in TCPA class  
26 action on behalf of over 2 million class members).

27 52. Following class certification, five of the six matters above were resolved on  
28 a class-wide basis and are in various stages of approval, as described above.

1 Mr. Bacon's efforts were instrumental in achieving this class-wide results, as  
2 he was the primary attorney who took the depositions in these matters,  
3 handled motion practice, drafted the motions for class certification, and  
4 argued the motions for class certification.

5 53.Mr. Bacon also oversees my firm's Appellate briefs, one of which he  
6 prevailed we prevailed on in the aforementioned 11<sup>th</sup> Circuit *Warner* action,  
7 and one of which he recently argued before the Ninth Circuit. See *Gallion v*  
8 *Charter Communications, Inc.* Case No. 18-55667 (9<sup>th</sup> Cir.). He has also  
9 been principally involved in drafting several petitions to the FCC on new  
10 rules and regulations the FCC is considering regarding dozens of different  
11 potential standards that are in flux with respect to consumer privacy statutes.

12 54.Mr. Bacon was recently approved at a rate of \$575 at final approval in close  
13 to a dozen class actions over the past two years, including the case of *Shelby*  
14 *v Two Jinn, Inc.*, Case No. 2:15-cv-03794-AB-GJS (C.D. Cal.). More  
15 recently, he has been approved on several instances at a rate of \$625 per hour.

16 55.Mr. Wheeler is a graduate of U. Penn Law and an associate at my firm. He  
17 has worked extensively on consumer protection matters, including class  
18 actions, during his two years with my firm. His work includes assisting on  
19 the *Caldera* and *Makaron* matters cited above, a certified TCPA class action.  
20 In light of his experience, an hourly rate of \$370 is warranted, and is further  
21 warranted in light of customary rates for associates on the Laffey Matrix.

22 56.I anticipate Law Offices of Todd M. Friedman, P.C. will incur an additional  
23 100-150 hours drafting the final approval papers, preparing for the final  
24 approval hearing, appearing at the hearing, and overseeing the settlement  
25 administration, including addressing any questions by settlement Class  
26 Members (there are zero objectors and one opt-out to date), addressing and  
27 responding to any objections, as well as filing status reports after final  
28 approval.

1 57. With regard to a bare bones loadstar amount, our current billing records  
 2 reflect approximately 330.6 hours of time. Based on these rates, and the  
 3 accompanying time entries for each corresponding individual, the loadstar  
 4 estimate for my office is \$212,521.50. I understand from reviewing the  
 5 records of my co-counsel that Kristensen Weisberg's records reflect 339.35  
 6 hours of time and a lodestar estimate of 198,716.25. Thus, the total Lodestar  
 7 to date for both firms is \$411,237.75.

8 58. Here is a breakdown and summary of the fees incurred by my office in  
 9 connection with this Case:

Name	Number of Hours	Rate/Hr	Total
Todd M. Friedman	97.5	\$725.00	\$70,687.50
Adrian R. Bacon	221.2	\$625.00	\$138,250.00
Thomas E. Wheeler	7.7	\$370.00	\$2,849.00
Lauren Walker	2	\$175.00	\$385.00
Bianca Zinnanti	2.2	\$175.00	\$350.00
<b>TOTAL</b>	<b>330.6</b>		<b>\$212,521.50</b>

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16 59. Attached hereto as Exhibit A is a true and correct list of all time entries in my  
17 firm's records for this matter.

18 60. Based on the foregoing, I submit that our request for an award of 1,200,000,  
19 which is only approximately 5% of the available Settlement benefits for Class  
20 Members, is reasonable. This represents a multiplier of 2.9 based on current  
21 billing records, which will be closer to 2.3 after the case is fully resolved and  
22 after administration efforts are complete. In my experience and based on  
23 prevailing case law, as cited in our contemporaneous papers, I believe this  
24 multiplier is well within the range of reasonableness for a case of this  
25 complexity and risk, based on the considerable results achieved for Class  
26 Members.

27 61. I also would submit that in light of the fact that Plaintiff took an active role  
28 in the investigation and litigation of this case, that Ms. Kim should be

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1 awarded an incentive award of \$5,000. Ms. Kim diligently participated  
2 throughout the case in investigating the allegations, providing information  
3 and cocumentation necessary to the litigation, participated in motions and  
4 settlement discussions, and ensured that the Class Members received the  
5 substantial recovery made available to them. I believe the incentive award  
6 sought is reasonable and fair under the circumstances.

7  
8 I declare under penalty of perjury under the laws of California and the United  
9 States of America that the foregoing is true and correct, and that this declaration  
10 was executed on April 22, 2019.

11 By: /s/ Todd M. Friedman  
12 Todd M. Friedman, Esq.

# EXHIBIT A

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THE LAW OFFICES OF TODD M. FRIEDMAN, PC  
WOODLAND HILLS, CA 91367



**Kim, Lisa v. Tinder**

**TIME ENTRIES: Thomas E Wheeler, Esq. – Associate Attorney**

**Time Entry – .3 Hours June 11, 2018**

Discuss Case with Adrian Bacon, review case file; Wheeler, Thomas/Attorney

**Time Entry – 2 Hours June 13, 2018**

Discuss Case with Adrian Bacon, prepare for, travel to and attend in person meeting with defense counsel to meet and confer under Local Rules and Standing Order regarding motion for extension of time to file motion for class certification; Wheeler, Thomas/Attorney

**Time Entry – .3 Hours June 25, 2018**

Review court order re class certification, emails with firm re same; Wheeler, Thomas/Attorney

**Time Entry – .6 Hours June 25, 2018**

Draft stipulation to extend class certification deadlines; emails with defense counsel re same; Wheeler, Thomas/Attorney

**Time Entry – .1 Hours July 2, 2018**

Emails with defense counsel re stipulation to extend class certification deadlines; Wheeler, Thomas/Attorney

**Time Entry – .1 Hours July 3, 2018**

Emails with defense counsel re stipulation to extend class certification deadlines; Wheeler, Thomas/Attorney

**Time Entry – .4 Hours July 5, 2018**

Emails with defense counsel re stipulation to extend class certification deadlines; finalize and file stipulation, and send courtesy copies to chambers; Wheeler, Thomas/Attorney

**Time Entry – 2 Hours July 5, 2018**

Draft Rule 26F report, discuss with Adrian Bacon and Todd Friedman; emails with defense counsel re same; Wheeler, Thomas/Attorney

**Time Entry – .5 Hours July 9, 2018**

Finalize Rule 26F report for filing, emails with defense re same; Wheeler, Thomas/Attorney

**Time Entry – .5 Hours July 12, 2018**

Review Order on motion to compel arbitration; discuss with Adrian Bacon and Todd Friedman; Wheeler, Thomas/Attorney

**Time Entry – .3 Hours September 11, 2018**

Request streamlined extension on opening brief in 9<sup>th</sup> circuit appeal; emails with co-counsel re same; Wheeler, Thomas/Attorney

**Time Entry – .1 Hours October 5, 2018**

Emails with co-counsel re appeal status and deadlines; Wheeler, Thomas/Attorney

**Time Entry – .5 Hours April 19, 2019**

Case file review and hours report summary; Wheeler, Thomas/Attorney

**TOTAL TIME – 7.7**  
**HOURLY RATE - \$370.00**  
**LODESTAR - \$2,849.00**

**TIME ENTRIES: Kim, Lisa v. Tinder - Bianca Zinnanti Paralegal**

**Time Entry – 0.2 Hours July 5, 2018**

Send Courtesy Copies of Stipulation to Extend Class Certification to Judge; Zinnanti, Bianca/Paralegal

**Time Entry – 0.5 Hours August 15, 2018**

Send Judge letter regarding Client's position re Mediation; Zinnanti, Bianca/Paralegal

**Time Entry – 1.5 Hours January 18, 2019**

Draft Table of Authorities and Table of Contents for Stipulation for Preliminary Approval; Zinnanti, Bianca/Paralegal

**TOTAL TIME – 2.2**  
**HOURLY RATE - \$175**  
**LODESTAR - \$385**

**Kim, Lisa v. Tinder**

**TIME ENTRIES: Lauren Walker –Paralegal**

**Time Entry – 1 Hours January 19, 2019**

Review Standing Order, download motion for preliminary approval and prepare chambers copies to be sent to court per standing order requirements; Walker, Lauren/Paralegal

**Time Entry – 1 Hours April 22, 2019**

Review Standing Order, download motion for attorneys' fees and costs and prepare chambers copies to be sent to court per standing order requirements; Walker, Lauren/Paralegal

**TOTAL TIME – 2**

**HOURLY RATE - \$175.00**

**LODESTAR - \$350.00**

**Kim, Lisa v. Tinder****TIME ENTRIES: Adrian R. Bacon, Esq. – Partner**

<b>Date</b>	<b>Task</b>	<b>Hours</b>
2/1/2018	Review initial case materials, discuss new case with Todd Friedman and John Kristensen	2
2/1/2018	Initial call to Lisa Kim regarding claims	0.2
2/6/2018	discuss new case with John Kristensen	0.3
2/7/2018	discuss new case with John Kristensen and Todd Friedman	0.3
2/8/2018	discuss new case with John Kristensen and Todd Friedman; review client retainer agreement, strategize about pre-filing diligence; case file review	0.7
2/12/2018	call with Todd Friedman and John Kristensen re case strategy	0.2
2/22/2018	discuss pre-filing diligence, case file review	0.5
3/14/2018	Legal Research - Unruh Act	2
4/12/2018	review/revise complaint	1
4/12/2018	emails with staff re new complaint filing and assignment of tasks	0.3
4/12/2018	update case file, review case materials	1
4/13/2018	review case assignment, thoroughly review court's standing order and local rules	1.5
4/13/2018	discussion with Todd Friedman and John Kristensen re case strategy	0.5
4/16/2018	review case file discuss with Todd Friedman	0.2
4/17/2018	case litigation discussion with cocounsel	0.1
4/18/2018	case litigation discussion with cocounsel	0.1
4/19/2019	case litigation discussion with cocounsel	0.1
4/23/2019	case litigation discussion with cocounsel	0.1
4/30/2018	emails with defense counsel re early exchange of information, extension of responsive pleading deadline, LR 7-3 compliance, LR 23-3 extension and possible motion to dismiss	0.3
4/30/2018	case litigation discussion with cocounsel	0.1
5/1/2018	further discussions with defense counsel re early 26f conference, LR 7-3 and 23-3 meet and confer and extension of pleading deadline	0.2
5/2/2018	further discussions with defense counsel re early 26f conference, LR 7-3 and 23-3 meet and confer and extension of pleading deadline	0.2
5/3/2018	further discussions with defense counsel re early 26f conference, LR 7-3 and 23-3 meet and confer and extension of pleading deadline	0.2
5/3/2018	review and approve stipulation to extend time to answer complaint; emails with defense counsel re same	0.2
5/4/2018	review initial scheduling conference order	0.3
5/7/2018	review additional documents provided by client	0.1
5/9/2018	draft motion for extension to file LR 7-3 deadline	0.5
5/9/2018	extensive diligence on Tinder Arbitration Agreement including recent revisions to arbitration clause language	2

5/9/2018	legal research on effectuation of opt out in arbitration agreements	1
5/9/2018	roundtable discussion with co-counsel re arbitration clause revisions made by Tinder	0.5
5/10/2018	roundtable discussion with co-counsel re arbitration clause and next steps	0.5
5/10/2018	revise/approve opt out letter for Plaintiff Lisa Kim	0.3
5/11/2018	meet and confer emails with defense counsel re LR 7-3 compliance	0.2
5/14/2018	meet and confer call with defense counsel re LR 7-3 compliance on motion to dismiss, motion to extend class certification deadline, and case management issues;	0.5
5/22/2018	emails with co-counsel re deadlines, update firm calendar	0.1
5/30/2018	meet and confer emails with defense counsel re motion to compel arbitration	0.2
5/30/2018	extensive discussions regarding arbitration agreement with co-counsel and client	1
5/31/2018	emails with Todd Friedman and co-counsel re arbitration issues	0.2
6/1/2018	emails with defense counsel re meet and confer on arbitration and motion to stay	0.2
6/1/2018	meet and confer call with defense counsel re arbitration, motion to stay, and discuss informal exchange of class data and information for settlement purposes	0.5
6/1/2018	call with Todd Friedman and John Kristensen re case strategy	0.3
6/1/2018	legal research on arbitration issues	1
6/5/2018	email discussion with all co-counsel regarding class settlement demand and case strategy	0.5
6/5/2018	draft and send class settlement demand to defense counsel	0.2
6/6/2018	review standing order, review/revise LR 7-3 joint stipulation, emails with defense counsel re same	0.3
6/7/2018	draft motion to extend deadline to file class certification motion, declaration of Adrian Bacon in support thereof; legal research re same	2
6/8/2018	draft motion to extend deadline to file class certification motion, declaration of Adrian Bacon in support thereof	1.5
6/8/2018	emails with Todd Friedman re case strategy	0.3
6/11/2018	review order striking motion to extend deadline, review standing order	0.4
6/11/2018	emails with Tom Wheeler re meet and confer	0.1
6/11/2018	emails with defense counsel re further meet and confer on motion to extend	0.3
6/11/2018	review motion to compel and motion to stay case; notes to file for outline of opposition brief, discuss with Todd Friedman	2
6/13/2018	call with Tom Wheeler; telephonically attend meet and confer conference with defense counsel re various matters; notes to file	1
6/13/2018	legal research on arbitration issues, including extensive keycite analysis on cases involving McGill v Citibank	1.5



6/13/2018	emails with co-counsel re case strategy and settlement	0.2
6/13/2018	draft LR 7-3 compliance statement, circulate to defense counsel for review, emails re same, file	0.4
6/19/2018	emails with co-counsel re arbitration	0.1
6/19/2018	emails with defense counsel re settlement	0.1
6/20/2018	call with John Kristensen re arbitration motion	0.3
6/20/2018	draft amended complaint	1
6/21/2018	further research on legal issues re arbitration and stay motion	1
6/21/2018	emails with co-counsel re motion and amended complaint	0.3
6/22/2018	further revisions to amended complaint	1
6/24/2018	draft written discovery to defendant	3
6/24/2018	draft revisions to Opposition to motion to compel and motion to stay	1.5
6/25/2018	draft revisions to Opposition to motion to compel and motion to stay; emails with co-counsel re same	2.5
6/25/2018	review court order denying motion to extend; emails with co-counsel re same	0.3
6/25/2018	finalize written discovery requests to Defendant	2.5
6/25/2018	review court order re motion for class certification deadline; discuss with Tom Wheeler	0.3
6/26/2018	review Cullaine v Uber First Circuit decision on arbitration - notes to file re impact on case at bar, discuss with co-counsel	1.2
6/27/2018	review and approve stipulation; emails with defense re same	0.3
6/29/2018	emails with defense counsel re sex parte application requesting supplemental briefing	0.2
7/2/2018	emails with defense counsel re sex parte application requesting supplemental briefing	0.2
7/2/2018	emails with defense counsel re stipulation to extend class certification deadline	0.1
7/3/2018	review and approve ex parte application for supplemental briefing	0.3
7/5/2018	emails with defense counsel re stipulation to extend class certification deadline	0.1
7/5/2018	emails with defense counsel re stipulation to extend class certification deadline	0.1
7/5/2018	review/revise Rule 26f report, discuss case with Todd Friedman and Tom Wheeler	1
7/6/2018	review court order denying ex parte application; emails with co-counsel re same	0.5
7/9/2018	emails with defense counsel re rule 26f report; revisions re same	0.3
7/11/2018	review court order re stipulation to extend responsive pleading deadline, update calendar	0.2
7/12/2018	prepare for hearing on motion to compel arbitration and stay case	1.5

7/12/2018	review court order granting motion to compel arbitration; extensive roundtable discussions with Todd Friedman and co-counsel	2.5
7/13/2018	discuss appeal with co-counsel	0.2
7/13/2018	draft and file notice of appeal	0.3
7/16/2018	review 9th circuit record on appeal opening docket entries	0.2
7/23/2018	emails with cocounsel re appeal	0.1
8/1/2018	review 9th circuit mediation issues	0.2
8/14/2018	review/revise/approve mediation response correspondence	0.5
8/15/2018	emails with cocounsel re mediation issues, revisions to 9th circuit mediation letter	0.8
8/16/2018	review mediation order, emails with cocounsel re same	0.2
9/6/2018	Begin shell outline of appeal brief; legal research re appeal	6
9/13/2018	emails with cocounsel re appeal	0.1
9/16/2018	further research on appeal brief, draft opening brief	2
9/17/2018	further research on appeal brief, draft opening brief	1
9/20/2018	further research on appeal brief, draft opening brief	1.2
9/22/2018	further research on appeal brief, draft opening brief	1.4
9/26/2018	emails with defense re settlement and mediation	0.2
9/26/2018	emails with cocounsel re settlement strategy	0.4
9/28/2018	call with John Kristensen and Todd Friedman re settlement demand response from Tinder	0.4
9/28/2018	draft response to defendant's settlement demand, emails with co-counsel and defense counsel re same	0.6
10/1/2018	emails with defense counsel re mediation	0.2
10/3/2018	emails with defense counsel re mediation	0.4
10/3/2018	draft request for extension on appeal brief deadline	1
10/4/2018	finalize and file motion for extension on appeal brief	0.5
10/4/2018	emails with cocounsel re mediation	0.3
10/4/2018	emails with defense re mediation	0.3
10/4/2018	emails with mediators	0.3
10/5/2018	emails with cocounsel re mediation	0.2
10/5/2018	emails with defense re mediation	0.2
10/5/2018	emails with mediators	0.2
10/12/2018	call with defense counsel re further information and documentation necessary for mediation	0.5
10/12/2018	emails with cocounsel re mediation information and preparation for mediation	0.5
10/12/2018	emails with mediator	0.2
11/19/2018	emails with co-counsel re mediation	0.2
11/19/2018	draft mediation brief and assemble documents and information	5
11/20/2018	emails with co-counsel re mediation	0.2

11/27/2018	revisions to mediation brief	1.5
11/28/2018	revisions to mediation brief	1
11/29/2018	emails with cocounsel re mediation and strategy	1.2
11/29/2018	prepare for mediation	2.5
11/29/2018	call with Todd Friedman re mediation	0.5
11/29/2018	travel to mediation and attend all day mediation	15
11/30/2018	communications with Judge Meisinger re mediator's proposal	0.3
12/1/2018	emails with cocounsel and defense counsel and mediator re mediator's proposal and settlement	0.3
12/5/2018	emails with defense counsel re settlement	0.2
12/5/2018	emails with cocounsel re settlement	0.3
12/6/2018	emails with defense counsel re settlement	0.4
12/6/2018	emails with cocounsel re settlement	0.6
12/7/2018	emails with cocounsel re appeal and settlement	0.3
12/7/2018	revise/approve notice of settlement	0.2
12/9/2018	emails with defense and cocounsel re settlement	0.2
12/10/2018	emails with defense and cocounsel re settlement	0.2
12/10/2018	call with Todd Friedman re settlement	0.2
12/12/2018	emails with defense and cocounsel re settlement	0.2
12/16/2018	review/revise settlement agreement documents	3.5
12/16/2018	call with Todd Friedman re settlement	0.2
12/18/2018	review/revise settlement agreement documents	2
12/20/2018	review/revise settlement agreement documents	2.2
12/20/2018	emails with cocounsel and defense counsel re changes to settlement agreement	0.3
12/24/2018	emails with defense counsel re further revisions to settlement documents	0.2
12/27/2018	further revisions to settlement documents, review additional redlines	1.2
12/27/2018	emails with defense counsel re further revisions to settlement documents	0.2
12/27/2018	call with Todd Friedman re settlement	0.2
12/30/2019	draft motion for preliminary approval and declarations in support thereof; assemble exhibits	8.2
12/31/2018	further revisions to settlement documents, review additional redlines	1
12/31/2018	emails with co-counsel re preliminary approval papers, and client declaration	0.5
12/31/2018	draft client declaration in support of preliminary approval	0.7
12/31/2018	draft motion for preliminary approval	7.2
12/31/2018	emails with defense counsel re preliminary approval	0.2
1/2/2019	emails with cocounsel and defense re settlement	0.3
1/8/2019	emails with defense counsel re revisions to preliminary approval papers	0.5
1/9/2019	review comments and revisions to approval papers; revise approval papers per redlines and comments	2.5

1/9/2019	meet and confer call with defense counsel re preliminary approval motion	0.5
1/11/2019	further emails with defense counsel re settlement	0.2
1/11/2019	review case file including documents produced pursuant to mediation privilege, and other information in file as further diligence in preliminary approval efforts	3.2
1/16/2019	draft LR 7-3 compliance statement, circulate to defense counsel for review, emails re same, file	0.4
1/17/2019	meet and confer call with defense counsel re preliminary approval brief	0.2
1/17/2019	finalize and file LR 7-3 statement	0.3
1/18/2019	further revisions to approval papers; emails with co-counsel re same	3.5
1/20/2019	finalize and file preliminary approval brief	4.5
1/28/2019	discuss preliminary approval with defense counsel and cocounsel	0.3
1/29/2019	discuss preliminary approval with defense counsel and cocounsel	0.3
2/4/2019	review notice of opposition to approval motion	1.5
2/4/2019	discuss opposition brief with cocounsel	0.5
2/4/2019	extensive outline of opposition brief, memo to file re same	1.5
2/5/2019	discuss opposition brief with defense counsel	0.7
2/5/2019	begin draft of reply in support of preliminary approval	2
2/5/2019	emails with cocounsel re reply brief	0.3
2/7/2019	emails with cocounsel re reply brief	0.1
2/8/2019	emails with defense counsel and cocounsel re statement of decision	0.3
2/8/2019	emails with cocounsel re reply brief and case strategy	0.5
2/8/2019	legal research re reply brief	1.2
2/10/2019	revisions to draft of reply brief	5.2
2/10/2019	emails with cocounsel and defense counsel re preliminary approval	0.3
2/11/2019	further revisions to reply in support of preliminary approval and accompanying filings	6
2/11/2019	discussions with cocounsel re reply brief	0.8
2/11/2019	emails with defense counsel re reply brief	0.4
2/13/2019	emails with defense counsel and cocounsel re joint statement of decision; revisions to joint statement	0.6
2/20/2019	begin preparations for preliminary approval hearing	1.2
2/21/2019	review court order taking motion under submission, discuss next steps with cocounsel	0.3
2/28/2019	emails with cocounsel re joint status report	0.1
3/1/2019	review order granting preliminary approval	1.2
3/1/2019	discuss next steps with cocounsel and Todd Friedman	0.5
3/5/2019	emails with Todd Friedman and defense re preliminary approval and administration	0.3
3/6/2019	draft revised proposed order granting preliminary approval, and revised class notice pursuant to the court's order	1

3/6/2019	call with defense counsel re class notice and proposed order	0.2
3/6/2019	emails with defense counsel re preliminary approval	0.3
3/7/2019	emails with defense counsel re preliminary approval	0.1
3/8/2019	emails with defense counsel re preliminary approval	0.3
3/8/2019	facilitate the filing of the revised preliminary approval documents with cocounsel's office	0.4
3/11/2019	emails regarding administration procedures	0.1
3/12/2019	emails regarding administration procedures	0.1
3/18/2019	emails regarding administration procedures	0.1
3/26/2019	review and approve final notice documents prepared by Epiq	0.5
3/27/2019	emails with defense re class notice	0.1
4/1/2019	emails with claims administrator and defense counsel	0.3
4/3/2019	review and approve email notice in final form, as well as IVR script used by claims administrator for questions from class members	1.5
4/3/2019	review class notice website; emails re same	0.6
4/4/2019	emails with cocounsel re fee petition, and administration status	0.3
4/6/2019	discuss class settlement with class member	0.3
4/6/2019	emails with co-counsel re settlement	0.2
4/7/2019	discuss class settlement with class member	0.1
4/8/2019	emails with cocounsel re fee petition, and administration status	0.1
4/11/2019	call with cocounsel re fee petition	0.3
4/11/2019	call with Todd Friedman re case status	0.3
4/11/2019	emails with cocounsel re case status	0.1
4/13/2019	emails with class member re opt out procedure	0.1
4/15/2019	emails with class member re opt out procedure; review class notice	0.2
4/16/2019	emails with defense counsel and Todd Friedman re administration status	0.3
4/17/2019	emails with cocounsel re fee petition	0.1
4/18/2019	draft motion for attorneys fees and costs	6
4/19/2019	draft motion for attorneys fees and costs	4.2
4/19/2019	call with defense counsel re meet and confer on motion for fees and costs and incentive award	0.2
4/19/2019	emails with cocounsel re motion for fees and costs and incentive award	1.2
4/20/2018	revisions to Motion for Fees and Costs and Declaration of Todd Friedman, assemble firm hours reports	8.2
4/21/2018	revisions to Motion for Fees and Costs and Declaration of Todd Friedman, assemble firm hours reports	10.3
4/22/2018	revisions to Motion for Fees and Costs and Declaration of Todd Friedman, assemble firm hours reports	7.2
	TOTAL HOURS	221.2
	TOTAL LODESTAR	\$138,250.00

**Kim, Lisa v. Tinder****TIME ENTRIES: Todd M. Friedman, Esq. – Managing Senior Partner**

<b>Date</b>	<b>Task</b>	<b>Hours</b>
2/1/2018	Review initial case materials, discuss new case with Adrian Bacon and John Kristensen	2
2/7/2018	discuss new case with John Kristensen and Adrian Bacon	0.3
2/8/2018	discuss new case with John Kristensen and Adrian Bacon; review client retainer agreement, strategize about pre-filing diligence; case file review	1
2/8/2018	Open new case file in firm calendar system; diary all deadlines and assign internal tasks	1
2/12/2018	call with Adrian Bacon and John Kristensen re case strategy	0.2
2/21/2018	call with John Kristensen re case strategy	0.2
2/22/2018	discuss pre-filing diligence, case file review	0.5
4/12/2018	review/revise complaint	1
4/13/2018	review case assignment and standing order	1
4/13/2018	review notice of court directed ADR program	0.1
4/16/2018	review case file discuss with Adrian Bacon	0.2
4/17/2018	case litigation discussion with cocounsel	0.1
4/18/2018	case litigation discussion with cocounsel	0.1
4/18/2018	call with John Kristensen re case strategy	0.2
4/18/2018	review standing order	0.5
4/19/2019	case litigation discussion with cocounsel	0.1
4/23/2018	draft/approve declaration of Todd Friedman; case discussions with co-counsel re same	0.2
4/30/2018	case litigation discussion with cocounsel and opposing counsel	0.2
5/1/2018	case litigation discussion with cocounsel and opposing counsel	0.1
5/2/2018	case litigation discussion with cocounsel and opposing counsel	0.1
5/3/2018	case litigation discussion with cocounsel and opposing counsel	0.1
5/4/2018	review initial scheduling conference order; update file	0.3
5/7/2018	review additional documents provided by client	0.1
5/9/2018	roundtable discussion with co-counsel re arbitration clause revisions made by Tinder	0.5
5/10/2018	roundtable discussion with co-counsel re arbitration clause and next steps	0.5
5/22/2018	emails with co-counsel	0.1
5/30/2018	extensive discussions regarding arbitration agreement with co-counsel and client	1
5/31/2018	emails with Adrian Bacon and co-counsel re arbitration issues	0.2
6/1/2018	call with Adrian Bacon and John Kristensen re case strategy	0.3
6/5/2018	email discussion with all co-counsel regarding class settlement demand and case strategy	0.5
6/5/2018	email with class member re claims	0.1

6/8/2018	emails with Adrian Bacon re case strategy	0.3
6/11/2018	review motion to compel and motion to stay case; discuss with Adrian Bacon	1
6/21/2018	emails with co-counsel re motion and amended complaint	0.3
6/22/2018	review and approve final draft of first amended complaint	0.7
6/25/2018	review court order denying motion to extend; emails with co-counsel re same	0.3
6/25/2018	review and approve final draft of opposition brief	0.6
6/26/2018	review Cullaine v Uber First Circuit decision on arbitration, discuss with co-counsel	0.5
7/5/2018	review/revise Rule 26f report, discuss case with Adrian Bacon and Tom Wheeler	0.5
7/6/2018	review court order denying ex parte application; emails with co-counsel re same	0.5
7/12/2018	review court order granting motion to compel arbitration; extensive roundtable discussions with Adrian Bacon and co-counsel	2.5
7/13/2018	discuss appeal with co-counsel	0.2
7/16/2018	review 9th circuit record on appeal opening docket entries; update firm calendar system with appeal deadlines	0.5
7/17/2018	prepare and file mediation questionnaire	0.7
8/15/2018	review and approve final draft of mediation letter to 9th circuit	0.3
8/16/2018	review mediation order, emails with cocounsel re same	0.2
9/11/2018	request streamlined extension to file 9th circuit appeal brief	0.3
9/26/2018	emails with defense re settlement and mediation	0.2
9/26/2018	emails with cocounsel re settlement strategy	0.4
9/28/2018	call with John Kristensen and Todd Friedman re settlement demand response from Tinder	0.4
9/28/2018	Emails with defense counsel and cocounsel re settlement	0.2
10/1/2018	emails with defense counsel re mediation	0.2
10/1/2018	emails with defense counsel re mediation	0.2
10/4/2018	emails with cocounsel re mediation	0.3
10/4/2018	emails with defense re mediation	0.3
10/4/2018	emails with mediators	0.3
10/5/2018	emails with cocounsel re mediation	0.2
10/5/2018	emails with defense re mediation	0.2
10/5/2018	emails with mediators	0.2
10/12/2018	emails with cocounsel re mediation information and preparation for mediation	0.5
10/12/2018	emails with mediator; review and pay mediation invoice	0.4
11/2/2018	review and approve joint status statement	0.3
11/19/2018	emails with co-counsel re mediation	0.2
11/20/2018	emails with co-counsel re mediation	0.2



11/27/2018	revisions to mediation brief	3
11/28/2018	finalize mediation brief send to mediator	2
11/28/2018	emails with co-counsel re mediation	0.3
11/28/2018	emails with cocounsel re mediation and strategy	0.7
11/28/2018	reach out to claims administrators for class notice bids	0.5
11/28/2018	call with Adrian Bacon re mediation	0.5
11/29/2018	participate telephonically in mediation, numerous calls with mediator and Adrian Bacon	2
12/1/2018	emails with cocounsel and defense counsel and mediator re mediator's proposal and settlement	0.3
12/3/2018	emails with cocounsel re settlement	0.5
12/3/2018	begin draft of settlement agreement	2.5
12/5/2018	emails with defense counsel re settlement	0.5
12/5/2018	emails with cocounsel re settlement	0.4
12/6/2018	emails with defense counsel re settlement	0.3
12/6/2018	emails with cocounsel re settlement	0.4
12/7/2018	emails with cocounsel re appeal and settlement	0.3
12/9/2018	draft motion for preliminary approval	1
12/9/2018	emails with defense and cocounsel re settlement	0.2
12/10/2018	emails with defense and cocounsel re settlement	0.5
12/10/2018	call with defense counsel re settlement	0.2
12/10/2018	call with Adrian Bacon re settlement	0.2
12/10/2018	approve notice of settlement documents	0.2
12/11/2018	review 9th circuit order, update file with new deadlines	0.2
12/12/2018	emails with defense and cocounsel re settlement	0.2
12/16/2018	call with Adrian Bacon re settlement	0.2
12/20/2018	review and revise settlement agreement documents	1.8
12/20/2018	emails with cocounsel and defense counsel re changes to settlement agreement	0.3
12/21/2018	revisions to class notice documents	1.2
12/22/2018	emails and call with defense counsel re revisions to settlement and notice documents	0.5
12/22/2018	revisions to class notice and settlement documents	0.5
12/24/2018	emails with defense counsel re further revisions to settlement documents	0.2
12/27/2018	emails with defense counsel re further revisions to settlement documents	0.2
12/27/2018	call with Adrian Bacon re settlement	0.2
12/28/2019	draft motion for preliminary approval and declaration in support thereof	6.4
12/31/2018	final review of settlement papers	1
12/31/2018	emails with co-counsel re preliminary approval papers, and client declaration	0.5
12/31/2018	draft declaration in support of motion for preliminary approval	3.5

1/2/2019	emails with cocounsel and defense re settlement	0.3
1/2/2019	receipt of and review of signed settlement agreement	0.2
1/2/2019	review and approve stipulation to lift stay; emails with counsel re same	0.4
1/2/2019	review declaration of John Kristensen, revisions to preliminary approval brief	1.2
1/8/2019	emails with defense counsel re stipulation to lift stay, review comments and revisions approve for filing	0.3
1/18/2019	emails with co-counsel re preliminary approval papers and accompanying filings	0.8
1/19/2019	final review and revisions to preliminary approval papers	2.5
1/20/2019	emails with staff re service of chambers copy of papers to court and standing order requirements	0.3
1/28/2019	emails with cocounsel re preliminary approval	0.2
1/29/2019	discuss preliminary approval with defense counsel and cocounsel	0.3
2/4/2019	review notice of opposition to approval motion	1.5
2/4/2019	discuss opposition brief with cocounsel	0.5
2/5/2019	emails with cocounsel re reply brief	0.3
2/7/2019	emails with cocounsel re reply brief	0.1
2/8/2019	emails with defense counsel and cocounsel re statement of decision	0.3
2/8/2019	emails with cocounsel re reply brief and case strategy	0.5
2/10/2019	review and revise draft of reply brief	1.2
2/10/2019	emails with defense counsel and cocounsel re preliminary approval	0.5
2/11/2019	review final draft of reply brief, additional revisions; discuss with Adrian Bacon	1.6
2/11/2019	emails with defense counsel and cocounsel re preliminary approval	0.5
2/13/2019	review ninth circuit order, update calendar in file	0.2
2/21/2019	review court order taking motion under submission, discuss next steps with cocounsel	0.3
2/28/2019	emails with cocounsel re joint status report	0.1
3/1/2019	discuss next steps with cocounsel and Adrian Bacon	0.5
3/1/2019	review order granting preliminary approval	0.6
3/5/2019	emails with Adrian Bacon and defense counsel re preliminary approval and administration	0.3
3/6/2019	emails with defense counsel re preliminary approval	0.2
3/7/2019	emails with defense counsel re preliminary approval	0.1
3/8/2019	emails with defense counsel re preliminary approval	0.3
3/8/2019	facilitate the filing of the revised preliminary approval documents with cocounsel's office	1
3/11/2019	emails regarding administration procedures	0.1
3/12/2019	emails regarding administration procedures	0.1
3/18/2019	emails regarding administration procedures	0.1
4/1/2019	emails with claims administrator and defense counsel	0.3

4/4/2019	emails with cocounsel re fee petition, and administration status	0.2
4/6/2019	emails with co-counsel re settlement	0.2
4/8/2019	emails with cocounsel re fee petition, and administration status	0.1
4/11/2019	call with Adrian Bacon re case status	0.3
4/11/2019	emails with cocounsel re case status	0.1
4/16/2019	emails with defense counsel and Adrian Bacon re administration status	0.3
4/17/2019	emails with cocounsel re fee petition	0.1
4/18/2018	Draft Motion for Attorneys' Fees and Costs and accompanying Declaration,	6
4/19/2019	emails with cocounsel re motion for fees and costs and incentive award	1.2
4/19/2018	Draft Motion for Attorneys' Fees and Costs and accompanying Declaration,	5
4/22/2018	Finalize Motion for Attorneys' Fees and Costs and accompanying Declaration, instructions to staff re filing	6
	TOTAL HOURS	97.5
	TOTAL LODESTAR	\$70,687.50

**TOTAL TIME – 330.6**  
**LODESTAR - \$212,521.50**

# EXHIBIT B

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THE LAW OFFICES OF TODD M. FRIEDMAN, PC  
WOODLAND HILLS, CA 91367

# LAFFEY MATRIX

- [History](#)
- [Case Law](#)
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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375

6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363
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The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., McDowell v. District of Columbia, Civ. A. No. 00-594 (RCL), LEXSEE 2001 U.S. Dist. LEXIS 8114 (D.D.C. June 4, 2001); Salazar v. Dist. of Col., 123 F.Supp.2d 8 (D.D.C. 2000).

\* “Years Out of Law School” is calculated from June 1 of each year, when most law students graduate. “1-3” includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). “4-7” applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier “1-3” from June 1, 1996 until May 31, 1999, would move into tier “4-7” on June 1, 1999, and tier “8-10” on June 1, 2003.

\*\* The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.



1 John P. Kristensen (SBN 224132)  
 2 David L. Weisberg (SBN 211675)  
 3 Christina M. Le (SBN 237697)  
 4 **KRISTENSEN WEISBERG, LLP**  
 5 12450 Beatrice Street, Suite 200  
 6 Los Angeles, California 90066  
 7 Telephone: 310-507-7924  
 8 Facsimile: 310-507-7906  
 9 *john@kristensenlaw.com*  
 10 *david@kristensenlaw.com*  
 11 *christina@kristensenlaw.com*

12 Todd M. Friedman (SBN 216752)  
 13 Adrian R. Bacon (SBN 280332)  
 14 **LAW OFFICES OF TODD M. FRIEDMAN, P.C.**  
 15 21550 Oxnard Street, Suite 780  
 16 Woodland Hills, CA 91367  
 17 Telephone: (216) 220-6496  
 18 Facsimile: (866) 633-0028  
 19 *tfriedman@attorneysforconsumers.com*  
 20 *abacon@attorneysforconsumers.com*

*Attorneys for Plaintiff and all others similarly situated*

**THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

LISA KIM, individually on behalf of herself and all others similarly situated,

Plaintiff,

vs.

TINDER, INC., a Delaware corporation; MATCH GROUP, LLC, a Delaware limited liability company; MATCH GROUP, INC., a Delaware corporation; and DOES 1 through 10, inclusive, and each of them,

Defendants.

Case No.: 2-18-cv-03093

**DECLARATION OF PLAINTIFF  
LISA KIM IN SUPPORT OF  
PLAINTIFF’S MOTION FOR  
ATTORNEYS’ FEES AND COSTS  
AND CLASS REPRESENTATIVE  
INCENTIVE PAYMENT**

Date: June 17, 2019

Time: 1:30 p.m.

Courtroom: 7A



**DECLARATION OF LISA KIM**

I, Lisa Kim, hereby declare as follows:

1. I am the named plaintiff in this action. I have personal knowledge of the following facts and, if called upon as a witness, could and would competently testify thereto, except as to those matters which are explicitly set forth as based upon my information and belief and, as to such matters, I am informed and believe they are true and correct.

2. My attorneys informed me at the beginning of this litigation of the responsibilities of a class representative. I understand these responsibilities and am willing and prepared to put the interest of the class members before my own. Throughout this case, I believe that I served as an adequate class representative. I worked with my attorneys throughout the case, assisting in both formal and informal discovery that was requested of me, and assisting in drafting the complaint. I also regularly discussed the case with my attorneys when they had questions, and was involved and kept apprised of the status of settlement discussions and subsequently approved of the settlement that was obtained.

3. I am now seeking an incentive award of \$5,000.

4. I have agreed to a class settlement in this case with Defendants. I have reviewed the Complaint, the Settlement Agreement, which I executed, and other related materials, and have discussed their contents with my attorneys. I also provided a Declaration in support of the Motion for Preliminary Approval of the Settlement and Class Certification. I believe that the settlement achieved is an outstanding result for the Class, and is fair and reasonable, considering the potential risks of going forward with litigation, especially in light of some of the defenses that Defendants have raised. In determining that this Settlement is fair and reasonable, my attorneys advised me that about the substantial risks of not having class certification approved. In light of the serious risks of going forward



**KW** KRISTENSEN WEISBERG LLP  
Attorneys for Plaintiffs

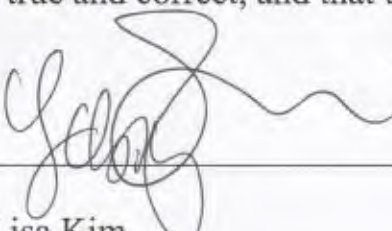
1 with this case, the chance that we did not win class certification, the likelihood of  
2 appeals, the potential for lengthy delay, and the ultimate uncertainty of recovery  
3 through litigation of the claims brought under the Unruh Act, I believe the  
4 settlement is fair and reasonable and represents an outstanding result for Class  
5 Members.

6 5. I understand that by settling this case, both Parties were able to avoid  
7 costly and time consuming additional litigation and trial. I understand that there  
8 are approximately 230,000 Class Members who will receive benefits from this  
9 Settlement.

10 6. To my knowledge, I have no interest that is not in line with the class  
11 members. My goal in bringing this case was to ensure that Defendants were made  
12 aware of their violations under the Unruh Act of price discrimination based on  
13 age, and that I could achieve a fair result for the Class Members who I believed  
14 were affected by the policies and practices that affected me. I believe that both of  
15 these goals have been achieved by this settlement, which includes obtaining  
16 Defendants agreement to stop these acts according to the current California laws,  
17 and I am proud to have been a part of it.

18 7. I respectfully request the Court approve the Motion for Final  
19 Approval, the Motion for Attorneys' Fees, and Incentive Award.

20 8. I declare under penalty of perjury under the laws of California and  
21 the United States that the foregoing is true and correct, and that this declaration  
22 was executed on April 21, 2019.

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24   
25 Lisa Kim

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28 **DECLARATION OF PLAINTIFF LISA KIM IN SUPPORT OF MOTION FOR  
ATTORNEYS' FEES AND COSTS AND REPRESENTATIVE INCENTIVE AWARD**



1 John P. Kristensen (SBN 224132)  
 2 David L. Weisberg (SBN 211675)  
 3 Christina M. Le (SBN 237697)  
 4 **KRISTENSEN WEISBERG, LLP**  
 5 12450 Beatrice Street, Suite 200  
 6 Los Angeles, California 90066  
 7 Telephone: 310-507-7924  
 8 Facsimile: 310-507-7906  
 9 *john@kristensenlaw.com*  
 10 *david@kristensenlaw.com*  
 11 *christina@kristensenlaw.com*

12 Todd M. Friedman (SBN 216752)  
 13 Adrian R. Bacon (SBN 280332)  
 14 **LAW OFFICES OF TODD M. FRIEDMAN, P.C.**  
 15 21550 Oxnard Street, Suite 780  
 16 Woodland Hills, CA 91367  
 17 Telephone: (216) 220-6496  
 18 Facsimile: (866) 633-0028  
 19 *tfriedman@attorneysforconsumers.com*  
 20 *abacon@attorneysforconsumers.com*  
 21 *Attorneys for Plaintiff and all others similarly*  
 22 *situated*

23 **THE UNITED STATES DISTRICT COURT**  
 24 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

25 LISA KIM, individually on behalf of  
 26 herself and all others similarly  
 27 situated,

28 Plaintiff,

vs.

TINDER, INC., a Delaware  
 corporation; MATCH GROUP, LLC,  
 a Delaware limited liability company;  
 MATCH GROUP, INC., a Delaware  
 corporation; and DOES 1 through 10,  
 inclusive, and each of them,

Defendants.

Case No.: 2-18-cv-03093

**DECLARATION OF CHRISTINA  
 M. LE IN SUPPORT OF  
 PLAINTIFF’S MOTION FOR  
 ATTORNEYS’ FEES AND COSTS  
 AND CLASS REPRESENTATIVE  
 INCENTIVE PAYMENT**

Date: June 17, 2019

Time: 1:30 p.m.

Courtroom: 7A



**DECLARATION OF CHRISTINA M. LE**

I, Christina M. Le, hereby declare as follows:

1. I am an attorney at law, duly licensed to practice in all Courts in the State of California. I am a Senior Associate at the firm of Kristensen Weisberg, LLP, and counsel of record for Lisa Kim (“Plaintiff”), the Class Representative in this action.

2. I am licensed to practice law before this court and all California state courts and all federal courts located in the State of California. I have personal knowledge of the following facts, and if called to do so, could and would testify as follows.

**QUALIFICATIONS OF CLASS COUNSEL**

3. I am an attorney licensed to practice in the state California. I am admitted to practice before the United States District Courts for the Northern, Southern, and Central Districts of California and the Ninth Circuit Court of Appeal. I am currently admitted *pro hac vice* in the State of Indiana for a Title IX case I am currently working on against Purdue University and its former professor on behalf of our client, the professor’s victim.

4. I graduated from U. C. Berkeley in 1999 and received my law Degree from Loyola Law School in 2004. I have worked for several well-known regional and national defense litigation firms, such as Archer Norris, PLC and Lewis Brisbois Bisgaard & Smith, LLP, in addition to working in the corporate and litigation department of Mercury Insurance Company. At these firms and companies, I gained extensive litigation experience handling hundreds of cases in both State and Federal Court, where I have represented individuals and various commercial enterprises in a wide array of cases.

5. In February of 2017, I joined Kristensen Weisberg, LLP as a Senior Associate. Our firm specializes in class action cases along with employment,



1 product liability, personal injury, and business /consumer fraud litigation. I have  
2 worked on several of our firm’s various class action cases, involving TCPA  
3 claims, claims of false advertising and fraud, and this current case against the  
4 Tinder defendants. I worked closely with my Managing Partner, John P.  
5 Kristensen, my other colleagues at Kristensen Weisberg, LLP, our staff, and our  
6 Co-Counsel from the Law Offices of Todd M. Friedman, P.C., on this case.

7 6. As of April 19, 2019, I have billed almost 200 hours on this case, as  
8 evidenced in my law firm’s time invoices. All of the work indicated in my billing  
9 was necessary to further the litigation of Plaintiff’s case.

10 7. I declare the foregoing under penalty of perjury under the laws of the  
11 United States of America. Given this 22nd day of April, 2019 at Los Angeles,  
12 California.

13 /s/ Christina M. Le

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15 Christina M. Le  
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 21 *Attorneys for Plaintiff and all others similarly*  
 22 *situated*

23 **THE UNITED STATES DISTRICT COURT**  
 24 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

25 LISA KIM, individually on behalf of  
 26 herself and all others similarly  
 27 situated,

28 Plaintiff,

vs.

TINDER, INC., a Delaware  
 corporation; MATCH GROUP, LLC,  
 a Delaware limited liability company;  
 MATCH GROUP, INC., a Delaware  
 corporation; and DOES 1 through 10,  
 inclusive, and each of them,

Defendants.

Case No.: 2-18-cv-03093

**DECLARATION OF JOHN P.  
 KRISTENSEN IN SUPPORT OF  
 PLAINTIFF’S MOTION FOR  
 ATTORNEYS’ FEES AND COSTS  
 AND CLASS REPRESENTATIVE  
 INCENTIVE PAYMENT**

Date: June 17, 2019

Time: 1:30 p.m.

Courtroom: 7A

**DECLARATION OF JOHN P. KRISTENSEN**

I, John P. Kristensen, hereby declare as follows:

1. I am an attorney at law, duly licensed to practice in all Courts in the State of California. I am the Managing Partner of the firm of Kristensen Weisberg, LLP, and counsel of record for Lisa Kim (“Plaintiff”), the Class Representative in this action.

2. I am licensed to practice law before this court and all California state courts and all federal courts located in the State of California. I have personal knowledge of the following facts, and if called to do so, could and would testify as follows.

**SUMMARY OF CASE HISTORY AND SETTLEMENT**

3. Plaintiff, a putative class member, retained my firm on or around February 8, 2018, to represent her individually, and the Class in their claims against Defendants Tinder, Inc., Match Group, LLC, and Match Group, Inc. (“Defendants”).

4. On April 12, 2018, Plaintiff filed her class action lawsuit against Defendants, alleging that Defendants violated the Unruh Act. Defendants Tinder, Inc., Match Group, LLC, and Match Group, Inc., (“Defendants”) responded on June 11, 2018 by filing a Motion to Compel Arbitration or Stay Under the Colorado Abstention Doctrine. On June 22, 2018, Plaintiff filed her First Amended Complaint, adding the UCL cause of action for public injunctive relief. In their Motion, Defendants claimed that Plaintiff had entered into an arbitration agreement based on her alleged assent to the arbitration provision in Tinder app’s Term of Use through the use of “sign-up wrap” consent in order to access the app. Defendants’ Motion to Compel Arbitration was granted on July 5, 2018, and the Court compelled Plaintiff’s claims to arbitration. Since this matter was brought to the attention of Class Counsel, they initiated a thorough







1 investigation, and conducted relevant factual and legal research. The information  
2 learned through this investigation was invaluable during settlement negotiations.

3 5. Class Counsel and Defendant engaged in extensive negotiations  
4 including an exchange of letters, emails, and telephone conversations that  
5 thoroughly analyzed the relevant legal, social, and factual matters at issue, and  
6 explored the parties' respective positions on the merits of the action and viability  
7 of class certification.

8 6. On July 16, 2018, Plaintiff filed her appeal of the Court's decision on  
9 the Motion, based on her position that the Court did not appropriately consider  
10 California Supreme Court precedent interpreting substantive California law in  
11 *McGill v. Citibank, N.A.*, 2 Cal.5th 945 (2017), which states that claims for public  
12 injunctive relief, such as the one brought in Plaintiff's case under the UCL, cannot  
13 be compelled to arbitration. In addition, Plaintiff would argue that the Court Case  
14 2:18-cv-03093-JFW-AS Document 52 Filed 01/20/19 Page 13 of 33 Page ID  
15 #:512 disregarded recent relevant appellate case law, *Cullinane v. Uber*  
16 *Technology, Inc.* 893 F.3d 53 (1st Cir. 2018), which bore directly on whether  
17 there was appropriate assent by Plaintiff and the Class Members to the Tinder  
18 app's Term of Use.

19 7. A mediation was scheduled for November 29, 2018, and the Parties  
20 stipulated to continue the initial briefing deadlines in the appeal. The Parties  
21 attended a mediation with Judge Meisinger on November 29, 2018. The Parties  
22 did not resolve the case at the mediation, but engaged in subsequent discussions  
23 with Judge Meisinger. With his guidance, this Settlement, which was considerable  
24 and unprecedented for an Unruh Act claim, was reached on December 1, 2018.

25 8. The specific terms of the Settlement are described in further detail in  
26 the Motion for Attorneys' Fees and Costs and Representative Incentive Award  
27 and accompanying documents. Specifically as it applies to this Motion, after  
28

1 negotiation of the substantive terms were completed, it was agreed that  
2 Defendants would not oppose any request by Plaintiff's counsel for attorneys'  
3 fees up to \$1.2 million based on Plaintiff's efforts in obtaining substantive and  
4 meaningful relief for Plaintiff and the Class.

5 9. Afterwards, the Parties worked together and finalized the Settlement  
6 Agreement and it was executed by all parties by early January of 2019.

7 10. Thereafter, on January 20, 2019, Plaintiff filed her Motion for  
8 Preliminary Approval of the Class Settlement and Certification of the Settlement  
9 Class, with the Defendants filing a Non-opposition to the Motion. On February 4,  
10 2019, Allan Candelore, an individual and non-party to this case who has a  
11 separate action filed against the Tinder defendant (Los Angeles Superior Court  
12 Case No. BC583162), filed an Opposition to the Motion. On February 11, 2019,  
13 Plaintiff filed a Reply to the Opposition.

14 11. On March 1, 2019, the Court granted Plaintiff's Motion for Motion  
15 for Preliminary Approval of the Class Settlement and Certification of the  
16 Settlement Class, requesting that a revised proposed Notice be submitted to the  
17 Court, with the Parties submitting a Joint Proposed Order.

18 12. After the parties complied with these further submissions, on March  
19 12, 2019, the Court entered the final order on the Motion, preliminarily approving  
20 the Settlement and the certifying the Class. The Court also designated the Law  
21 Offices of Todd M. Friedman, P.C. and Kristensen Weisberg, LLP as Class  
22 Counsel, with Plaintiff as the Class Representative; all who would be able to  
23 fairly and adequately represent the Class. The Court also approved and  
24 designated Epiq to serve as the Settlement Administrator. The Court ordered that  
25 Plaintiff and Class Counsel could make a written application to the Court for an  
26 award of attorneys' fees, costs and expenses, and Plaintiff's fee award by April  
27 22, 2019. The Court also set a Final Approval hearing at 1:30 p.m. on June 17,  
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1 2019.

2 13. Taking into account the burdens, uncertainty and risks inherent in  
3 this litigation, the Parties have concluded that further prosecution and defense of  
4 this action could be protracted, unduly burdensome, and expensive, and that it is  
5 desirable, fair, and beneficial to the class that the action now be fully and finally  
6 compromised, settled and terminated in the manner and upon the terms and  
7 conditions set forth in the Settlement Agreement.

8 14. I believe as Class Counsel that the claims asserted in the action have  
9 merit. However, I recognize the burdens, uncertainty and risks inherent in  
10 continuing this litigation. Taking into account the burdens, uncertainty and risks  
11 inherent in this litigation, I and my Co-Counsel have concluded that further  
12 prosecution of this action could be protracted, unduly burdensome, and expensive,  
13 and that it is desirable, fair, and beneficial to the class that the action now be fully  
14 and finally compromised, settled and terminated in the manner and upon the terms  
15 and conditions set forth in the Settlement Agreement. These risks include  
16 uncertainties particular to the class action lawsuit process such as class  
17 certification. These risks also include the expense and effort required to pursue  
18 the Litigation and perhaps the difficulties of proof related to prosecuting such  
19 claims. Even if a favorable determination is reached, the possibility of subsequent  
20 appeals further suggests that this action could be protracted, unduly burdensome,  
21 and expensive. Thus, we believe the terms and conditions of this Settlement  
22 Agreement are fair, reasonable and adequate to the proposed class, and that it is in  
23 the best interests of the proposed class to settle the Action. As a result, based  
24 upon my experience in litigating Class Actions, I strongly believe the Settlement  
25 is fair and reasonable and deserves final approval.

26 15. At this time, the Parties are moving forward with our efforts to  
27 implement the terms of Settlement. Plaintiff and her counsel, which includes my  
28



1 office, have filed our Motion for Attorneys' Fees and Costs and Representative  
2 Incentive Award for efforts in this litigation and substantive settlement, which has  
3 provided a significant benefit to Plaintiff and over 200,000 members in the Class  
4 for their Unruh Act claims.

5 **QUALIFICATIONS OF CLASS COUNSEL**

6 16. I am currently the Managing Partner at Kristensen Weisberg, LLP. I  
7 am an attorney licensed to practice in the state California. I am admitted to  
8 practice before the United States District Courts for the Northern, Eastern,  
9 Southern, and Central Districts of California. I have also been admitted pro hac  
10 vice for the United States District Court for Idaho, Oregon, Arizona, Minnesota,  
11 the Northern District of Texas, the Western District of Virginia as well as two  
12 complex helicopter fatality cases in Arizona State Court.

13 17. I graduated from Washington & Lee University School of Law in  
14 Lexington, Virginia in 2002 where I received an academic scholarship. Upon  
15 graduation, I moved back to Los Angeles and quickly gained admission to the  
16 California bar. I began my civil career at Daniels, Fine, Israel, Schonbuch &  
17 Lebovits, LLP in Century City. I then spent four years at a multi-disciplinary  
18 practice, Avila & Peros, LLP.

19 18. In 2008, I accepted employment at a firm, O'Reilly & Danko, which  
20 subsequently changed its name to O'Reilly || Collins. The firm was one of the  
21 preeminent plaintiffs' law firms in the country obtaining numerous seven and  
22 eight figure verdicts and settlements during my tenure.

23 19. In 2011, I was responsible for a then record and maximum fine  
24 against an automotive company after I requested the federal government  
25 investigate an auto-manufacturer for its statements regarding why it was  
26 conducting a recall overseas, but not for similar vehicles in the United States. The  
27 manufacturer paid the maximum fine in excess of \$16,000,000.00 as a result of



1 my investigation.

2 20. In 2011, the Daily Journal selected me as one of five associates to  
3 watch in the state of California in its annual 20 under 40 edition. I was the sole  
4 plaintiffs' attorney to receive the accolade. I have also been named to Super  
5 Lawyers' Rising Stars for Southern California in 2012, 2013 and 2014.

6 21. I have tried employment and wrongful death trials and obtained  
7 numerous million dollar settlements for my clients.

8 22. I have litigated against NBC, Enterprise Rent-A-Car, Spearmint  
9 Rhino, Ford Motor Company, Toyota Motor Company, General Motors, Taco  
10 Bell, Sony and numerous other large corporations. My practice has included in  
11 multiple appellate cases where I have argued successfully before the California  
12 Courts of Appeal.

13 23. During the course of the Toyota Sudden Acceleration litigation, I  
14 was appointed by Hon. Anthony J. Mohr to the Plaintiffs' Steering Committee  
15 and was re-appointed in 2012 by Hon. Lee Edmon. Judge Edmon also appointed  
16 me as a member of the national fee committee to recommend the allocations and  
17 disbursements of the common benefit fund.

18 24. In 2012, I took a position with one of the nation's top Class Action  
19 law firms, Strange & Carpenter, where I was instrumental in preparing one of the  
20 bellwether sudden acceleration cases that resolved in December 2012. That case  
21 was a model for the California class claim that resolved along with the national  
22 case. Today, I remain in the role as the youngest attorney appointed to the  
23 plaintiffs' steering committees in the California Toyota Sudden Acceleration  
24 cases.

25 25. At Strange & Carpenter and since opening Kristensen Weisberg, LLP  
26 in 2013, I have litigated numerous class action claims, including privacy cases,  
27 illegal phone recording, UCL, and TCPA claims.





1           26. In 2017, I obtained what was then a record Title IX settlement  
2 against UC Regents.

3           27. I was appointed Class Counsel in the matter of *Mankin v. Mountain*  
4 *West Research Center, L.C.*, case number 2:13-cv-06447-DSF-AGR in the  
5 Central District of California. The class settlement in that matter was approved by  
6 Hon. Dale S. Fischer.

7           28. Therefore, my experience is sufficient to act as Class Counsel in this  
8 case.

9           29. Other than myself, several members of my firm have knowledge of  
10 this case and have worked on this case with me with my oversight.

11           30. Christina M. Le, a Senior Associate at my law firm, has been the  
12 primary associate that has been working on this case with me. She has over  
13 thirteen (13) years of legal experience working as a litigator in both State and  
14 Federal Courts. She has submitted a separate declaration detailing her legal  
15 experience.

16           31. David L. Weisberg, who is Partner at my firm, has also provided  
17 work on this case on behalf of Plaintiff and the Class. A graduate of McGeorge  
18 School of Law, University of Pacific in Sacramento, California, in 2000, David  
19 has been practicing law since 2001. Since we started our firm in 2013, David and  
20 I have worked together on several of our firm's class action cases, including  
21 *Mankin* which I referenced earlier.

22           32. Jesenia A. Martinez, an Associate at my firm, has also worked on  
23 this case. Jesenia attended Tufts University for her undergraduate degree and  
24 attended Southwestern University School of Law, graduating from its prestigious  
25 SCALE accelerated program in May 2017. While in law school, Jesenia  
26 completed externships with Judge Kim McLane Wardlaw at the United States  
27 Court of Appeals for the Ninth Circuit and Judge Dean D. Pregerson at the United  
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1 States District Court for the Central District of California. Jesenia was also part of  
2 Law Review and was a Dean’s Fellow and Teaching Assistant while in law school  
3 where she earned several CALI and Witkin awards for excellence. She began  
4 working at Kristensen Weisberg, LLP after taking the bar.

5 **CLASS COUNSEL’S ATTORNEYS’ FEES AND LITIGATION COSTS AND EXPENSES**

6 33. I have attached as Exhibit “1” hereto a true and correct copy of a  
7 detailed itemization of the attorneys’ fees. I have attached as Exhibit “2” hereto a  
8 true and correct copy of a detailed itemization of the litigation costs and expenses  
9 incurred by Kristensen Weisberg, LLP, Class Counsel for Plaintiff. The  
10 itemization covers the period from February 1, 2018 to April 19, 2019. My firm’s  
11 services have been listed chronologically in a single document so that the Court  
12 can readily determine what services were rendered by all timekeepers on each  
13 day. The time and costs were recorded daily.

14 34. Exhibit “1” states for each entry: (i) the name or initials of the  
15 timekeeper, (ii) the hourly rate sought for the timekeeper, (iii) a description of the  
16 services performed, (iv) the amount of time billed and (v) the dollar amount  
17 charged for that entry. The dollar amounts of these entries were not “rounded up.”  
18 The entries were also coded consistently with the litigation and expense codes set  
19 forth in the Uniform Task-Based Management System (“UTBMS”) via EBillity,  
20 Westlaw’s billing software. Exhibits “1” and “2” show each daily entry of fees or  
21 costs, along with one-page summaries showing the total fees and costs incurred  
22 under each category of UTBMS coding.

23 35. Exhibit “1” also describes the services rendered in sufficient detail  
24 for the Court to determine the nature and reasonableness of the services; (ii)  
25 wherever possible, my firm sought to avoid overly general or non-specific entries;  
26 (iii) time records were maintained on a contemporaneous and daily basis, in  
27 increments of one-tenth of an hour; (iv) my firm avoided block-billing and







1 multiple appearances by my firm at the same event; (v) my firm also sought to  
2 minimize time charged for emails and inter-office communications; and (vi) the  
3 fee requested reflected in Exhibit “1” represent historical hourly rates.

4 36. Litigation costs and expenses are listed in Exhibit “2” in a reasonably  
5 narrow and descriptive manner using the UTBMS expense codes; (ii) only actual  
6 costs and expenses of the type normally billed to a client are included in Exhibit  
7 “2”; (iii) my firm is not seeking reimbursement for items generally regarded as  
8 overhead, such as photocopy costs or Westlaw/Lexis charges; and (iv) my firm  
9 did not incur litigation costs and expenses for first class airfare, expensive hotels  
10 and high-priced meals.

11 37. Exhibit “1” reflects that my firm spent 339.35 hours investigating,  
12 prosecuting and settling this Action. In addition, I estimate that Class Counsel  
13 will incur an additional \$100,000.00 in legal fees and costs in our efforts to  
14 finalize the Settlement, which will include addressing the anticipated objections to  
15 the Settlement. The lodestar value of my firm’s fee for these services is  
16 \$198,716.25.<sup>1</sup> My firm’s applicable hourly rates during the pendency of the  
17 Action as Class Counsel have been: (i) \$725.00 per hour for John P. Kristensen;  
18 (ii) \$725.00 per hour for David L. Weisberg; (iii) \$625.00 per hour for Christina  
19 M. Le; and \$350.00 per hour for Jesenia A. Martinez. I also had legal assistants  
20 that worked on this case, Justin Farzadkish and Vanessa Brahm – they are billed  
21 at \$175.00 per hour. These are reasonable rates in line with comparable hourly  
22 rates charged by other firms that handle complex litigation in the Southern  
23 California market.

24 38. The cost entries in Exhibit “2” reflect that Class Counsel incurred

25 \_\_\_\_\_  
26 <sup>1</sup> The hours listed for David L. Weisberg are less than what Mr. Weisberg actually billed for  
27 this matter due to a software glitch in the timekeeping software. That is why the billing time for  
28 each entry is correct and the total number listed at the end of Exhibit “1” is off.

1 \$6,589.96 in costs.

2 39. Our firm entered into a standard retainer with Plaintiff and that  
3 pursuant to that retainer, Plaintiff will only be awarded an incentive award and not  
4 receive any other funds and the retainer complied with California Rules of  
5 Professional Conduct Rule 2-200.

6 I declare the foregoing under penalty of perjury under the laws of the  
7 United States of America. Given this 22nd day of April, 2019 at Los Angeles,  
8 California.

9 */s/ John P. Kristensen*

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11 John P. Kristensen  
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# **EXHIBIT “1”**

**Kristensen Weisberg, LLP**

Invoice submitted to:  
**Lisa Kim**

**Invoice # 10218**

Invoice Date: 04/22/19
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Services Through: 04/22/19
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Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
In Reference To: <b>Kim v. Tinder (Professional Services)</b>						
01/31/18	JK	Prepare	prepare email to TMF re potential class rep.	0.10	725.00	\$72.50
01/31/18	JK	Research	Legal research re: Unruh Act.	0.20	725.00	\$145.00
01/31/18	JK	Review	review email from AB re: amendment or new filing and chances of a stip.	0.10	725.00	\$72.50
01/31/18	JK	Review	review email from CML re: potential class rep.	0.10	725.00	\$72.50
02/01/18	JK	Review	review email from AB re class representatives.	0.10	725.00	\$72.50
02/01/18	JK	Review	review email from TMF re: class rep.	0.10	725.00	\$72.50
02/01/18	JK	Review	review email from AB re: former client standing.	0.10	725.00	\$72.50
02/01/18	JK	Review	review email from CL re: plaintiff.	0.10	725.00	\$72.50
02/01/18	JK	Review	review email from AB re call to client.	0.10	725.00	\$72.50
02/01/18	CL	Legal Services	Telephone conversation with Lisa Kim to discuss her involvement and role as named class member for case, and how class cases work.	0.60	625.00	\$375.00
02/01/18	CL	Legal Services	Analyze and respond to emails with co-counsel discussing Ms. Kim serving as named class member in case.	0.50	625.00	\$312.50
02/05/18	JK	Prepare	prepare email requesting JAM assisting with opening new file.	0.10	725.00	\$72.50
02/05/18	JK	Prepare	prepare edits to retainer.	0.20	725.00	\$145.00
02/05/18	JK	Review	review email from CML to plaintiff accompanying retainer.	0.10	725.00	\$72.50
02/06/18	JK	Review	review email from CL re: prepping retainer.	0.10	725.00	\$72.50
02/06/18	CL	Legal Services	Prepare email to client with contingency fee retainer for class action and directions re review and execution.	0.20	625.00	\$125.00
02/07/18	JK	Prepare	Prepare email to CML re: status of retainer.	0.10	725.00	\$72.50
02/07/18	JK	Review	review email from CML re: following up with plaintiff re retainer.	0.10	725.00	\$72.50
02/07/18	JK	Review	review email from TMF re: status of plaintiff.	0.10	725.00	\$72.50
02/08/18	JK	Review	review executed retainer from client and accompanying email from CML.	0.10	725.00	\$72.50
02/08/18	JK	Prepare	Prepare email to TMF and AB accompanying retainer.	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
02/08/18	JK	Review	review email from CML to plaintiff with status report.	0.10	725.00	\$72.50
02/08/18	JK	Prepare	prepare email to TMF and AB and review responses re: strategy re filing.	0.30	725.00	\$217.50
02/08/18	CL	Legal Services	Analyze client's email with executed contingency fee retainer attached for class actions.	0.20	625.00	\$125.00
02/08/18	CL	Legal Services	Analyze case law and conduct legal research to understand claims for preparation of complaint.	0.70	625.00	\$437.50
02/08/18	CL	Legal Services	Prepare retainer agreement.	0.40	625.00	\$250.00
02/08/18	CL	Legal Services	Email and respond to emails from client Lisa Kim regarding the review, approval and return of executed retainer agreement.	0.40	625.00	\$250.00
02/12/18	JK	Prepare	email to co counsel re: call.	0.10	725.00	\$72.50
02/12/18	JK	Phone Call	phone call with co counsel.	0.20	725.00	\$145.00
02/21/18	JK	Phone Call	phone call with TMF re: strategy.	0.20	725.00	\$145.00
02/22/18	JK	Prepare	prepare email to co-counsel re filing amended complaint.	0.10	725.00	\$72.50
02/22/18	JK	Review	review email from TMF re: fling in CA.	0.10	725.00	\$72.50
02/22/18	CL	Legal Services	Analyze and respond to emails with co-counsel discussing status to file Ms. Kim's case.	0.40	625.00	\$250.00
02/28/18	JK	Review	review email from CML re:: drafting complaint.	0.10	725.00	\$72.50
02/28/18	CL	Legal Services	Analyze and respond to emails with Partner John Kristensen re recommendations on content of client's class action complaint.	0.20	625.00	\$125.00
03/01/18	CL	Legal Services	Research regarding complaints with similar allegations to assist in preparation of class complaint.	1.20	625.00	\$750.00
03/01/18	CL	Legal Services	Conduct further legal research in preparation for drafting complaint	0.40	625.00	\$250.00
03/01/18	JK	Review	review email from CML to staff requesting other Federal Complaint.	0.10	725.00	\$72.50
03/01/18	JK	Review	review Warner Complaint and accompanying email.	0.20	725.00	\$145.00
03/01/18	JK	Review	review email from CML with retainer.	0.10	725.00	\$72.50
03/01/18	JF	Prepare	Prepare shell of complaint based on samples provided by attorneys, under direction of the attorneys.	0.70	175.00	\$122.50
03/05/18	JK	Prepare	review and prepare initial draft (outline) of Complaint.	0.60	725.00	\$435.00
03/05/18	JK	Review	review email from CML re: status of drafting Complaint	0.10	725.00	\$72.50
03/08/18	CL	Prepare	Begin initial draft of complaint.	2.30	625.00	\$1,437.50
03/13/18	JF	Prepare	Assist attorney in preparation of complaint by formatting and checking grammar to draft complaint prepared by attorney.	0.60	175.00	\$105.00
03/13/18	CL	Prepare	Continue preparation of initial draft of complaint.	3.10	625.00	\$1,937.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
03/13/18	CL	Research	Conduct research regarding correct Tinder entities to include as defendants based on who has been sued in other cases.	2.60	625.00	\$1,625.00
03/14/18	CL	Legal Services	Prepare email to partner John Kristensen with draft of complaint for his review.	0.10	625.00	\$62.50
03/14/18	JK	Review	email from AB re: Tinder petitioning CA Scotus.	0.10	725.00	\$72.50
03/14/18	JK	Prepare	prepare email to CML re: status of draft of Complaint.	0.10	725.00	\$72.50
03/14/18	JK	Review	review draft complaint.	0.60	725.00	\$435.00
03/14/18	JK	Meeting	discuss complaint with CML.	0.10	725.00	\$72.50
03/14/18	CL	Legal Services	Analyze and respond to emails with Partner John Kristensen regarding the current draft of complaint and information from client regarding what she recalls regarding purchase of the Tinder Plus product.	0.30	625.00	\$187.50
03/21/18	JM	Review	Review email from CML re draft Complaint	0.10	350.00	\$35.00
03/21/18	CL	Legal Services	Further prepare draft of complaint by including Unruh claim.	0.60	625.00	\$375.00
03/21/18	CL	Legal Services	Conference with John Kristensen, partner, re proposed changes to the draft complaint.	0.50	625.00	\$312.50
03/21/18	DW	Review	CL email re: draft complaint	0.10	725.00	\$72.50
03/21/18	DW	Review	draft of complaint	0.40	725.00	\$290.00
03/21/18	JK	Review	review edits from CML to complaint.	0.30	725.00	\$217.50
03/21/18	JK	Meeting	Meeting with CML re: proposed changes to Complaint.	0.50	725.00	\$362.50
03/21/18	CL	Prepare	Complete preparation of initial draft of complaint.	1.40	625.00	\$875.00
03/26/18	JK	Review	review CML Complaint draft.	0.20	725.00	\$145.00
04/10/18	JK	Review	Review email form TMF re: strategy.	0.10	725.00	\$72.50
04/10/18	JK	Prepare	Prepare email to co-counsel re status of filing Complaint.	0.10	725.00	\$72.50
04/11/18	JK	Review	review draft of complaint from CML.	0.10	725.00	\$72.50
04/12/18	JM	Review	Review ECF Notice email re Plaintiff's Complaint	0.10	350.00	\$35.00
04/12/18	JM	Review	Review ECF Notice email re Civil Cover Sheet	0.10	350.00	\$35.00
04/12/18	JM	Review	Review ECF Notice emails re Request for Clerk to Issue Summons on Complaint for each Defendant	0.30	350.00	\$105.00
04/12/18	JM	Review	Review ECF Notice email re Certification and Notice of Interested Parties	0.10	350.00	\$35.00
04/12/18	CL	Legal Services	Analyze and respond to emails with co-counsel re their review and approval of complaint for filing.	0.30	625.00	\$187.50
04/12/18	CL	Legal Services	Analyze and respond to emails from co-counsel's office regarding information and documents pertaining to mutual client.	0.30	625.00	\$187.50
04/12/18	DW	Review	ECF notice re: notice of interested parties	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
04/12/18	DW	Review	ECF notice re: request for issuance of summons	0.10	725.00	\$72.50
04/12/18	DW	Review	ECF notice re: civil cover sheet	0.10	725.00	\$72.50
04/12/18	DW	Review	ECF notice re: filing of complaint	0.10	725.00	\$72.50
• 04/12/18	JF	Prepare	Prepare complaint for filing with the appropriate certification of service and Notice of Interested Parties.	0.50	175.00	\$87.50
• 04/12/18	JF	Prepare	Assist attorney in preparation of complaint by confirming appropriate contact information and state bar numbers for co-counsel in case and including information in complaint.	0.40	175.00	\$70.00
04/12/18	JK	Review	review email from AB re: status of filing.	0.10	725.00	\$72.50
04/12/18	JK	Meeting	meeting with CML re: status of complaint.	0.10	725.00	\$72.50
04/12/18	JK	Prepare	review draft of complaint, edit scope of class.	0.40	725.00	\$290.00
04/12/18	JK	Prepare	prepare email to CML re: scope of class.	0.10	725.00	\$72.50
04/12/18	JK	Prepare	Prepare civil case cover sheet.	0.30	725.00	\$217.50
04/12/18	JK	Prepare	Prepare Summons to Tinder, Match Group, LLC and Match Group, Inc.	0.30	725.00	\$217.50
04/12/18	JK	Prepare	Prepare Certificate of Interested Parties.	0.30	725.00	\$217.50
04/12/18	JK	Review	review email from CML re:" co-counsel address and edits to Complaint.	0.10	725.00	\$72.50
04/12/18	JK	Review	review email from MS re: TMF address.	0.10	725.00	\$72.50
04/12/18	JK	Review	review email from JF re co counsel.	0.10	725.00	\$72.50
04/12/18	JK	Review	review edits to Complaint by staff.	0.20	725.00	\$145.00
04/12/18	JK	Review	review Complaint by CML and accompanying email to co-counsel.	0.20	725.00	\$145.00
04/12/18	JK	Review	review email from co-counsel approving edits to Complaint.	0.10	725.00	\$72.50
04/12/18	JK	Review	review email from co-counsel's office re: retainer.	0.10	725.00	\$72.50
04/12/18	JK	Review	review ECF of Complaint filing.	0.10	725.00	\$72.50
04/12/18	JK	Review	review email from CML re: client contact.	0.10	725.00	\$72.50
04/12/18	JK	Review	review ECF re Civil Cover Sheet.	0.10	725.00	\$72.50
04/12/18	JK	Review	review ECF re Request to issue summons to Tinder.	0.10	725.00	\$72.50
04/12/18	JK	Review	review ECF re Request to issue summons to Match, LLC. (DE 4).	0.10	725.00	\$72.50
04/12/18	JK	Review	review ECF re Request to issue summons to Match Group, Inc. (DE 5).	0.10	725.00	\$72.50
04/12/18	CL	Prepare	Prepare final draft of complaint by making final changes.	1.30	625.00	\$812.50
04/12/18	CL	Legal Services	Prepare summons, cover sheet and other filing documents for District Court filing.	0.40	625.00	\$250.00
04/13/18	JM	Review	Review ECF Notice email re Notice of Assignment	0.10	350.00	\$35.00
04/13/18	JM	Review	Review ECF Notice email re Notice to Parties of Court-Directed ADR Program	0.10	350.00	\$35.00



Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
04/13/18	JM	Review	Review ECF Notice email re Notice of Deficiencies in Requests to Issue Summons	0.10	350.00	\$35.00
04/13/18	JM	Review	Review ECF Notice emails re corrected Request for Clerk to Issue Summons as to each defendant	0.30	350.00	\$105.00
04/13/18	JM	Review	Review email from JF re docket entries	0.10	350.00	\$35.00
04/13/18	DW	Review	JF email re: docket entries	0.10	725.00	\$72.50
04/13/18	DW	Review	ECF notice re: corrected request to issue summons	0.10	725.00	\$72.50
04/13/18	DW	Review	ECF notice re: deficiencies in request for summons	0.10	725.00	\$72.50
04/13/18	DW	Review	ECF notice re: ADR	0.10	725.00	\$72.50
04/13/18	DW	Review	ECF notice re: notice of assignment	0.10	725.00	\$72.50
04/13/18	JK	Review	Review NOTICE OF ASSIGNMENT to District Judge John F. Walter and Magistrate Judge Alka Sagar	0.10	725.00	\$72.50
04/13/18	JK	Review	review ECF Notice of Parties of Court to ADR Program.	0.10	725.00	\$72.50
04/13/18	JK	Review	review email from AB re: assignment.	0.10	725.00	\$72.50
04/13/18	JK	Review	review email from TMF re assignment.	0.10	725.00	\$72.50
04/13/18	JK	Review	review email re: deficiencies in Summons.	0.10	725.00	\$72.50
04/13/18	JK	Prepare	prepare edited Summons with Central District.	0.20	725.00	\$145.00
04/13/18	JK	Prepare	prepare email to co counsel re strategy.	0.10	725.00	\$72.50
04/13/18	JK	Review	review email from AB re: strategy.	0.10	725.00	\$72.50
04/13/18	JK	Prepare	Prepare email to CML re: Summons.	0.10	725.00	\$72.50
04/16/18	JM	Review	Review ECF Notice email re Notice of Deficiencies in revised Request for Clerk to Issue Summons for each Defendant	0.10	350.00	\$35.00
04/16/18	DW	Review	ECF notice re: notice of deficiencies of request for issuance of summons	0.10	725.00	\$72.50
04/16/18	JK	Review	review AB email re strategy.	0.10	725.00	\$72.50
04/16/18	JK	Review	review TMF email re: strategy.	0.10	725.00	\$72.50
04/17/18	JK	Review	review TMF email re strategy.	0.10	725.00	\$72.50
04/17/18	JK	Prepare	prepare email to TMF re strategy.	0.10	725.00	\$72.50
04/18/18	JM	Review	Review ECF Notice email re Standing Order by Judge John F. Walter	0.10	350.00	\$35.00
04/18/18	JM	Review	Review email from JF re Judge Walter's Standing Order	0.10	350.00	\$35.00
04/18/18	JM	Review	Review email from DLW responding to JF's email	0.10	350.00	\$35.00
04/18/18	JM	Review	Review email from JF noting calendar entry	0.10	350.00	\$35.00
04/18/18	CL	Legal Services	Analyze and respond to emails with co-counsel regarding the assignment of the Judge in matter.	0.40	625.00	\$250.00
04/18/18	DW	Review	JF e-mail re: calendar entry	0.10	725.00	\$72.50
04/18/18	DW	Prepare	E-mail to JF re: calendar entry	0.10	725.00	\$72.50
04/18/18	DW	Review	JF email re: standing order	0.10	725.00	\$72.50
04/18/18	DW	Review	ECF notice re: standing order	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
• 04/18/18	JF	Review	Review emails from attorneys giving directions on how to prepare shell, and what content to use from samples, in preparing shell of the draft complaint.	0.40	175.00	\$70.00
• 04/18/18	JF	Review	Review email from Co-Counsel's assistant indicating that current emails for her attorneys on case are the old addresses in the Court filing system, and she is seeking help to correct the.	0.30	175.00	\$52.50
04/18/18	JK	Review	review Judge Walter's Standing Order.	0.30	725.00	\$217.50
04/18/18	JK	Prepare	Prepare email to counsel re strategy.	0.10	725.00	\$72.50
04/18/18	JK	Phone Call	Phone call with TMF.	0.20	725.00	\$145.00
04/18/18	JK	Review	review email from JF accompanying Judge Walter Standing Order and request for deadlines.	0.10	725.00	\$72.50
04/18/18	JK	Review	review email from DLW re strategy and pleadings.	0.10	725.00	\$72.50
04/18/18	JK	Review	review email from JF re: deadline for efilng.	0.10	725.00	\$72.50
04/18/18	JK	Review	review email from CML re: request input from call with co counsel.	0.10	725.00	\$72.50
04/18/18	JK	Review	review email from TMF and request for client documents.	0.10	725.00	\$72.50
04/18/18	JK	Review	review further email require requests for documentation.	0.10	725.00	\$72.50
04/18/18	JK	Prepare	prepare Notice of Standing Order.	0.40	725.00	\$290.00
04/19/18	JM	Review	Review email from JF re draft Notice of Standing Order	0.10	350.00	\$35.00
04/19/18	JM	Review	Review email from JPK re draft Notice of Standing Order	0.10	350.00	\$35.00
04/19/18	CL	Legal Services	Analyze and respond to emails with client regarding proof of tinder purchase.	0.40	625.00	\$250.00
04/19/18	DW	Review	JK email re: notice of standing order	0.10	725.00	\$72.50
04/19/18	DW	Review	Standing Order	0.10	725.00	\$72.50
04/19/18	DW	Review	JF email re: standing order	0.10	725.00	\$72.50
04/19/18	JK	Review	review status report to client.	0.20	725.00	\$145.00
04/19/18	CL	Prepare	Brief status report to client	0.10	625.00	\$62.50
04/20/18	JM	Review	Review email from JF re draft of JPK declaration re ECF filing	0.10	350.00	\$35.00
04/20/18	JM	Review	Review email from CML re formatting of draft JPK Declaration re ECF filing	0.10	350.00	\$35.00
04/20/18	DW	Review	CL email re: JK declaration	0.10	725.00	\$72.50
04/20/18	DW	Review	JF email re: JK declaration	0.10	725.00	\$72.50
• 04/20/18	JF	Prepare	Prepare and respond to emails with attorneys advising of my receipt of issue with service upon one of the defendants.	0.20	175.00	\$35.00
04/20/18	JK	Prepare	Prepare and review declaration re: e filing.	0.20	725.00	\$145.00
04/20/18	JK	Review	review email from JF re service of process.	0.10	725.00	\$72.50
04/20/18	JK	Review	review response from CML to JF email re service of process in Delaware.	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
04/20/18	JK	Review	review follow up email from CML re: actual service through CT Corp.	0.10	725.00	\$72.50
04/20/18	JK	Review	review CML comments re declaration for e filing.	0.10	725.00	\$72.50
04/23/18	JM	Review	Review email from JF re revised draft of TMF Declaration re ECF filing	0.10	350.00	\$35.00
04/23/18	JM	Review	Review email from CML re revised draft of TMF Declaration re ECF filing	0.10	350.00	\$35.00
04/23/18	JM	Review	Review email from TMF re revised draft of TMF Declaration re ECF Filing	0.10	350.00	\$35.00
04/23/18	JM	Review	Review email from CML re final draft of TMF Declaration re ECF filing	0.10	350.00	\$35.00
04/23/18	JM	Review	Review ECF Notice email re TMF Declaration re ECF Filing	0.10	350.00	\$35.00
04/23/18	CL	Legal Services	Analyze and respond to emails with co-counsel re declaration prepared to indicate Todd Friedman as lead counsel.	0.30	625.00	\$187.50
04/23/18	DW	Review	ECF notice re: TF declaration	0.10	725.00	\$72.50
04/23/18	DW	Review	CL email re: draft declaration of TF	0.10	725.00	\$72.50
04/23/18	DW	Review	TF email re: revised declaration	0.10	725.00	\$72.50
04/23/18	DW	Review	CL email re: revised TF declaration	0.10	725.00	\$72.50
04/23/18	DW	Review	JF email re: revised TF declaration	0.10	725.00	\$72.50
04/23/18	JF	Investigate	Look into finding out how to correct and then making efforts to correct Co-counsel's email address during electronic service of issues in matter, as system shows their old email addresses.	0.50	175.00	\$87.50
04/23/18	JK	Review	review email from client re client documents.	0.10	725.00	\$72.50
04/23/18	JK	Review	review edits to dec of lead counsel and TMF declaration.	0.10	725.00	\$72.50
04/23/18	JK	Review	review email correspondence from JF accompanying edits to dec of lead counsel and TMF declaration.	0.10	725.00	\$72.50
04/23/18	JK	Review	Review TMF email re declaration.	0.10	725.00	\$72.50
04/23/18	JK	Review	review ECF filing of TMF declaration.	0.10	725.00	\$72.50
04/23/18	JK	Review	review email from TMF office re: declaration.	0.10	725.00	\$72.50
04/27/18	JM	Review	Review email from JF re receipt of POS re Match Group, Inc.	0.10	350.00	\$35.00
04/27/18	JM	Review	Review email from CML re status of service on defendants	0.10	350.00	\$35.00
04/27/18	JM	Review	Review email from JF re status of service on defendants	0.10	350.00	\$35.00
04/27/18	JM	Review	Review email from CML responding to JF re status of service on defendants	0.10	350.00	\$35.00
04/27/18	DW	Review	CL email re: service of defendants	0.10	725.00	\$72.50
04/27/18	DW	Review	JF email re: status of service of defendants	0.10	725.00	\$72.50
04/27/18	DW	Review	CL email re: service of defendants	0.10	725.00	\$72.50
04/27/18	DW	Review	JF email re: service of Match	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
• 04/27/18	JF	Prepare	Preparation of Notice of Proof of Service for Defendants for filing.	0.60	175.00	\$105.00
• 04/27/18	JF	Investigate	Pursuant to attorney's request, inquire with service company used status of service of complaint upon defendants.	0.20	175.00	\$35.00
04/27/18	JK	Review	review POS of Match Group Inc.	0.10	725.00	\$72.50
04/27/18	JK	Review	review email from CML re status of other defendants.	0.10	725.00	\$72.50
04/27/18	JK	Review	review email from JF re: status of other defendants' service.	0.10	725.00	\$72.50
04/27/18	CL	Legal Services	Analyze status of service of the various defendants in case.	0.30	625.00	\$187.50
04/30/18	JM	Review	Review email from JF re draft Notice of POS and POS for Match Group, Inc.	0.10	350.00	\$35.00
04/30/18	JM	Review	Review email from JPK responding to JF re draft Notice of POS and POS for Match Group, Inc.	0.10	350.00	\$35.00
04/30/18	JM	Review	Review ECF Notice email re Notice of POS filing re Match Group, Inc.	0.10	350.00	\$35.00
04/30/18	JM	Review	Review email from JF re Match Group, Inc.'s deadline to file responsive pleading to Complaint	0.10	350.00	\$35.00
04/30/18	JM	Review	Review email from JF re docket entry for Notice of POS re Match Group, Inc.	0.10	350.00	\$35.00
04/30/18	CL	Legal Services	Prepare email to defense counsel providing client's information for Tinder's tracking of her account.	0.10	625.00	\$62.50
04/30/18	DW	Review	JF email re: notice of POS of Match	0.10	725.00	\$72.50
04/30/18	DW	Review	JF email re: Match deadline to respond to complaint	0.10	725.00	\$72.50
04/30/18	DW	Review	ECF notice re: POS of Match	0.10	725.00	\$72.50
04/30/18	DW	Review	JK email re: POS of Match	0.10	725.00	\$72.50
04/30/18	DW	Review	JF email re: draft of notice of filing POS of Match	0.10	725.00	\$72.50
04/30/18	JK	Prepare	prepare Notice of POS for Match Group, Inc.	0.30	725.00	\$217.50
04/30/18	JK	Prepare	Prepare email to staff to file POS for Match Group, Inc.	0.10	725.00	\$72.50
04/30/18	JK	Review	Review email from JF to co counsel re: status of ECF.	0.10	725.00	\$72.50
04/30/18	JK	Review	Review email from TMF office re: email status and ECF.	0.10	725.00	\$72.50
04/30/18	JK	Review	Review email from TMF re: documentation from client.	0.10	725.00	\$72.50
04/30/18	JK	Review	review email from AB re:: judge Walter procedure.	0.10	725.00	\$72.50
04/30/18	JK	Review	review ECF of Notice of Service upon Match Group, Inc.	0.10	725.00	\$72.50
04/30/18	JK	Review	review email from AB forwarding email from Don Brown.	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
04/30/18	JK	Review	review email from JF re deadline for Match Group to Answer Complaint.	0.10	725.00	\$72.50
04/30/18	JK	Review	review email from CML to Don Brown with client contact information.	0.10	725.00	\$72.50
04/30/18	JK	Review	review following email from CML to client re documentation.	0.10	725.00	\$72.50
04/30/18	JK	Review	review correspondence from Don Brown acknowledging receipt of information re: plaintiff.	0.10	725.00	\$72.50
04/30/18	JK	Review	review email from Don Brown requesting extension to respond to Complaint and not oppose 23-3 extension.	0.10	725.00	\$72.50
• 04/30/18	JF	Prepare	Prepare email to co-counsel's staff re: ECF ability	0.10	175.00	\$17.50
05/01/18	JK	Review	review email from AB confirming extensions and requesting Rule 26 conference.	0.10	725.00	\$72.50
05/01/18	JK	Review	review email from Don Brown re: Rule 26 conference.	0.10	725.00	\$72.50
05/02/18	JK	Review	review email from AB re: scheduling Rule 26 conference.	0.10	725.00	\$72.50
05/02/18	JK	Review	review email from DB confirming Rule 26 Conference.	0.10	725.00	\$72.50
05/03/18	JM	Review	Review ECF Notice email re Stipulation Extending Time to Answer	0.10	350.00	\$35.00
05/03/18	JM	Review	Review email from JF re calendar entry for defendants' deadline to file and serve responsive pleading	0.10	350.00	\$35.00
05/03/18	DW	Review	JF email re: responsive pleading deadline	0.10	725.00	\$72.50
05/03/18	DW	Review	ECF notice re: stipulation extending time to answer	0.10	725.00	\$72.50
05/03/18	JK	Prepare	prepare email to counsel re: Rule 26.	0.10	725.00	\$72.50
05/03/18	JK	Review	review email and accompanying proposed stipulation re extension.	0.20	725.00	\$145.00
05/03/18	JK	Review	review AB emails and comments re stip.	0.10	725.00	\$72.50
05/03/18	JK	Review	review email of ECF filing of Stipulation re extension of time.	0.10	725.00	\$72.50
05/03/18	JK	Review	review email from JF re: calendaring.	0.10	725.00	\$72.50
05/04/18	DW	Review	JF email re: scheduling conference minute order	0.10	0.00 OT	\$0.00
05/04/18	DW	Review	ECF notice re: order setting scheduling conference	0.10	725.00	\$72.50
05/04/18	JK	Review	review Minute Order setting Scheduling Conference.	0.10	725.00	\$72.50
05/04/18	JK	Review	review email from JF with dates.	0.10	725.00	\$72.50
05/04/18	JM	Review	Review ECF Notice email re Minute Order in Chambers re setting Scheduling Conference	0.10	350.00	\$35.00
05/04/18	JM	Review	Review email from JF re calendar entries re Minute Order setting Scheduling Conference	0.10	350.00	\$35.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
05/06/18	CL	Legal Services	Analyze email received from client with screen shot of proof of purchase of Tinder Plus.	0.20	625.00	\$125.00
05/07/18	JK	Review	review email from MCL accompanying client documentation.	0.10	725.00	\$72.50
05/07/18	JK	Review	review TMF comments on documentation.	0.10	725.00	\$72.50
05/07/18	CL	Prepare	Email to team accompanying client documentation	0.10	625.00	\$62.50
05/09/18	JK	Review	review analysis and comments from TMF re: arbitration clause.	0.10	725.00	\$72.50
05/09/18	JK	Prepare	prepare email re arbitration clause.	0.10	725.00	\$72.50
05/09/18	JK	Review	review further analysis from Yoel re: arbitration.	0.20	725.00	\$145.00
05/09/18	JK	Review	review AB email re strategy.	0.10	725.00	\$72.50
05/09/18	JK	Review	review CML email re strategy.	0.10	725.00	\$72.50
05/09/18	CL	Legal Services	Analyze Tinder's terms of service and Tinder's revision to its terms of service and changes to the arbitration clause, to determine if client needs to take any other steps/how it impacts case.	0.70	625.00	\$437.50
05/09/18	CL	Legal Services	Analyze emails from co-counsel regarding the handling of change to Term of Service for Tinder with arbitration clause.	0.30	625.00	\$187.50
05/10/18	DW	Review	JF email re: proofs of service of Match and Tinder	0.10	725.00	\$72.50
05/10/18	DW	Review	TF email re: opt out of arb agreement	0.10	725.00	\$72.50
05/10/18	DW	Review	AB email re: opt out of arb agreement	0.10	0.00 OT	\$0.00
05/10/18	DW	Review	CL email re: opt out of arb agreement	0.10	725.00	\$72.50
05/10/18	DW	Review	AB email re: Hansen settlement	0.10	725.00	\$72.50
05/10/18	DW	Review	JK email re: Hansen settlement	0.10	725.00	\$72.50
05/10/18	DW	Review	JF email re: Hansen settlement	0.10	725.00	\$72.50
• 05/10/18	JF	Research	Conduct research for attorney regarding the new Term of Service just circulated by Tinder.	0.40	175.00	\$70.00
• 05/10/18	JF	Research	Prepare email to attorneys in case with email that friend received from Tinder with notice of class action settlement, but it appears to be for another class action with Tinder.	0.20	175.00	\$35.00
05/10/18	CL	Legal Services	Analyze emails with co-counsel re: Tinder's arbitration clause	0.40	625.00	\$250.00
05/10/18	JK	Review	review email from AB re: arbitration clause.	0.10	725.00	\$72.50
05/10/18	JK	Review	email from CML to client re: arbitration.	0.10	725.00	\$72.50
05/10/18	JK	Review	review AB further comments re strategy re arbitration.	0.10	725.00	\$72.50
05/10/18	JK	Review	review TMF email re strategy.	0.10	725.00	\$72.50
05/10/18	JK	Prepare	prepare correspondence re: strategy re arbitration.	0.10	725.00	\$72.50
05/10/18	JK	Prepare	prepare correspondence to outside counsel re strategy re arbitration.	0.10	725.00	\$72.50



Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
05/10/18	JK	Review	review CML and JF emails re: opt out correspondence.	0.40	725.00	\$290.00
05/10/18	JK	Review	review AB comments re opt out.	0.10	725.00	\$72.50
05/10/18	JK	Review	review correspondence to client re: opt opt.	0.10	725.00	\$72.50
05/10/18	JK	Review	review email form outside counsel re: attacking arb clauses post putative class.	0.10	725.00	\$72.50
05/10/18	JM	Review	Review email from JF re Hansen settlement	0.10	350.00	\$35.00
05/10/18	JM	Review	Review email from JPK re Hansen settlement	0.10	350.00	\$35.00
05/10/18	JM	Review	Review email from AB re Hansen settlement	0.10	350.00	\$35.00
05/10/18	JM	Review	Review email from CML re Plaintiff opting out of arbitration agreement	0.10	350.00	\$35.00
05/10/18	JM	Review	Review email from AB re Plaintiff opting out of arbitration agreement	0.10	350.00	\$35.00
05/10/18	JM	Review	Review email from CML re Plaintiff opting out of arbitration agreement draft	0.10	350.00	\$35.00
05/10/18	JM	Review	Review email from AB re Plaintiff opting out of arbitration agreement draft	0.10	350.00	\$35.00
05/10/18	JM	Review	Review email from TMF re Plaintiff opting out of arbitration agreement draft	0.10	350.00	\$35.00
05/10/18	JM	Review	Review email from JF re drafts of Notice of POS re Match Group, LLC and Tinder, Inc.	0.10	350.00	\$35.00
05/10/18	CL	Legal Services	Analyze and respond to emails with co-counsel regarding the handling of change to Term of Service for Tinder with arbitration clause, including preparation of opt out letter for client.	0.70	625.00	\$437.50
05/10/18	CL	Legal Services	Prepare client's opt out of Tinder Term of Service arbitration clause letter.	0.60	625.00	\$375.00
05/10/18	CL	Legal Services	Prepare email to client re review and return of executed opt out of Tinder's term of service arbitration clause letter.	0.20	625.00	\$125.00
05/10/18	CL	Legal Services	Telephone call with client regarding her review and return of the letter to Tinder indicating she is opting out of arbitration clause in the new Term of Service recently circulated.	0.50	625.00	\$312.50
05/22/18	DW	Review	ECF notice re: Match Group LLC filing	0.10	725.00	\$72.50
05/22/18	DW	Review	ECF notice re: POS of Tinder	0.10	0.00 OT	\$0.00
05/22/18	JK	Prepare	Prepare Notice of Proof of Service on Tinder.	0.30	725.00	\$217.50
05/22/18	JK	Prepare	Prepare Notice of Proof of Service on Match Group, LLC.	0.30	725.00	\$217.50
05/22/18	JK	Review	review ECF re: service on Tinder.	0.10	725.00	\$72.50
05/22/18	JK	Review	review ECF re service on Match Group, LLC.	0.10	725.00	\$72.50
05/22/18	JK	Review	review email from TMF re: deadline for class certification.	0.10	725.00	\$72.50



Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
05/22/18	JK	Review	review email from AB re: extension to motion for class cert.	0.10	725.00	\$72.50
05/22/18	JK	Prepare	prepare email to JF re calendaring for class certification.	0.10	725.00	\$72.50
05/22/18	JM	Review	Review ECF Notice email re Notice of POS re Tinder, Inc. filing	0.10	350.00	\$35.00
05/22/18	JM	Review	Review ECF Notice email re Notice of POS re Match Group, LLC filing	0.10	350.00	\$35.00
• 05/30/18	JF	Prepare	Assist in preparation of client opt out letter by formatting letter for finalization adding defendant attorney information, per the request of supervising attorneys.	0.40	175.00	\$70.00
05/30/18	JK	Review	review email from AB requesting info re: opt out.	0.10	725.00	\$72.50
05/30/18	JK	Review	review email from Alexandra Hill to AB re: opt out.	0.10	725.00	\$72.50
05/30/18	JK	Review	review email from CML re status of opt out.	0.10	725.00	\$72.50
05/30/18	JK	Review	review email from AB re: arbitration.	0.10	725.00	\$72.50
05/30/18	JK	Review	review cML follow up email to client re opt out.	0.10	725.00	\$72.50
05/30/18	JK	Prepare	prepare email to CML re: status of opt out.	0.10	725.00	\$72.50
05/30/18	JK	Review	review follow up emails re: client's authorization.	0.50	725.00	\$362.50
05/30/18	JK	Review	review term changes by Tinder.	0.20	725.00	\$145.00
05/30/18	JK	Review	review email from AB to defense counsel re: Rule 7-3 conference.	0.10	725.00	\$72.50
05/30/18	JK	Prepare	Prepare email to CML re: deadline for opt out.	0.10	725.00	\$72.50
05/30/18	JK	Review	review email from CML re: status of POA.	0.10	725.00	\$72.50
05/30/18	JK	Review	review CML draft of opt out correspondence.	0.10	725.00	\$72.50
05/30/18	JK	Review	review email from Alexandra Hill re: scheduling Rule 7-3 conference.	0.10	725.00	\$72.50
05/30/18	JK	Review	review email from Don Brown re: scheduling conference.	0.10	725.00	\$72.50
05/30/18	JK	Review	review further edits by CML to opt out.	0.20	725.00	\$145.00
05/30/18	JK	Review	review AB email re 7-3 and request for Rule 26 to occur concurrently.	0.10	725.00	\$72.50
05/30/18	JK	Review	review DB response to AB email re conferences.	0.10	725.00	\$72.50
05/30/18	JK	Review	review final correspondence re: opt out sent via JF.	0.10	725.00	\$72.50
05/30/18	JK	Review	review email from CML re client.	0.10	725.00	\$72.50
05/30/18	CL	Prepare	Email to co-counsel re status of POA	0.10	625.00	\$62.50
05/30/18	CL	Prepare	Message to client re: authority for POA	0.10	625.00	\$62.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
05/30/18	CL	Legal Services	Analyze emails with co-counsel re discussions with defense counsel re case and re status of sending in opt out notice for client to the arbitration clause in Tinder's Term of Service.	0.70	625.00	\$437.50
05/30/18	CL	Legal Services	Telephone conversation with client re the review and execution of the opt out letter to Tinder's term of service arbitration clause.	0.40	625.00	\$250.00
06/01/18	JK	Review	review decision in fitbit case to analysis re: Tinder.	0.30	725.00	\$217.50
06/01/18	JK	Review	review email from Alexandra Hill re: call in for Rule 7-3 conference.	0.10	725.00	\$72.50
06/01/18	JK	Review	Review AB email re: Rule 7-3 conference and strategy.	0.20	725.00	\$145.00
06/01/18	JK	Prepare	Prepare email to TMF and AB re: follow up call.	0.10	725.00	\$72.50
06/01/18	JK	Review	review email from AB re: client and strategy re Tinder.	0.10	725.00	\$72.50
06/01/18	JK	Phone Call	Phone call with AB and TMF re strategy.	0.30	725.00	\$217.50
06/03/18	CL	Legal Services	Prepare proposed order to Ex Parte re Supplemental Authority in support of opposition to Motion to Compel Arbitration.	0.50	625.00	\$312.50
06/05/18	JK	Review	review email from AB re strategy.	0.10	725.00	\$72.50
06/05/18	JK	Review	review email from TMF re strategy	0.10	725.00	\$72.50
06/05/18	JK	Review	review and prepare multiple follow up emails with TMF and AB re: strategy.	0.40	725.00	\$290.00
06/05/18	JK	Review	review Statement re: Local Rule 7-3 filed by Tinder.	0.20	725.00	\$145.00
06/05/18	JK	Review	review motion for extension of time to file class certification.	0.30	725.00	\$217.50
06/06/18	DW	Review	ECF notice re: motion for extension to file motion for class cert	0.10	0.00 OT	\$0.00
06/06/18	DW	Review	ECF email re: defendant's statement of 7-3 conference	0.10	725.00	\$72.50
06/06/18	JM	Review	Review ECF Notice email re Defendants' Statement re Local Rule 7-3 Conference	0.10	350.00	\$35.00
06/06/18	JM	Review	Review ECF Notice email re Plaintiff's Notice of Motion and Motion for Extension of Time to File Motion for Class Certification	0.10	350.00	\$35.00
06/11/18	DW	Review	CL email re: defendant's motion to compel arbitration	0.10	725.00	\$72.50
06/11/18	DW	Review	ECF notice re: defendant's notice of interested parties	0.10	725.00	\$72.50
06/11/18	DW	Review	ECF notice re: defendant's corporate disclosure statement	0.10	725.00	\$72.50
06/11/18	CL	Legal Services	Analyze emails with co-counsel's office re coordination of work for opposition to Tinder Defendants' Motion to Compel Arbitration.	0.20	625.00	\$125.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
06/11/18	DW	Review	ECF notice re: defendant's motion to compel arbitration	0.10	725.00	\$72.50
06/11/18	DW	Review	ECF notice re: striking of motion for extension of time to file class cert motion	0.10	725.00	\$72.50
06/11/18	JK	Review	review order re: filing motion for class certification.	0.10	725.00	\$72.50
06/11/18	JK	Review	review motion to compel arbitration.	0.90	725.00	\$652.50
06/11/18	JK	Review	review corporate disclosures by Defendants.	0.20	725.00	\$145.00
06/11/18	JK	Review	review certificate of interested parties filed by defendants.	0.10	725.00	\$72.50
06/11/18	JK	Review	review email from AB re: division of labor and responding to motion to compel arbitration.	0.10	725.00	\$72.50
06/11/18	JK	Prepare	prepare email response to AB re: division of labor in responding to motion to compel arbitration.	0.10	725.00	\$72.50
06/11/18	JK	Review	review email from CML re: deadlines.	0.10	725.00	\$72.50
06/11/18	JM	Review	Review ECF Notice email re Court striking Plaintiff's Motion for Extension of Time to File Motion for Class Certification	0.10	350.00	\$35.00
06/11/18	JM	Review	Review ECF Notice email re Defendants' Notice of Motion and Motion to Compel Arbitration or Stay Case re Colorado River Abstention	0.10	350.00	\$35.00
06/11/18	JM	Review	Review ECF Notice email re Defendants' Corporate Disclosure Statement	0.10	350.00	\$35.00
06/11/18	JM	Review	Review ECF Notice email re Notice of Interested Parties filed by Defendants	0.10	350.00	\$35.00
06/11/18	JM	Review	Review email from CML re calendaring deadlines re Defendants' Motion to Compel Arbitration	0.10	350.00	\$35.00
06/13/18	DW	Review	JF email re: deadlines associated with motion to compel arbitration	0.10	725.00	\$72.50
06/13/18	DW	Review	ECF notice re: motion for extension of time to file class certification motion	0.10	0.00 OT	\$0.00
06/13/18	DW	Review	ECF notice re: plaintiff's statement on Rule 7-3 conference	0.10	0.00 OT	\$0.00
06/13/18	DW	Review	ECF notice re: Platt Declaration on local rules compliance	0.10	725.00	\$72.50
06/13/18	CL	Legal Services	Analyze Motion to Compel Arbitration filed by Tinder defendants.	0.70	625.00	\$437.50
06/13/18	CL	Legal Services	Analyze emails between our office and co-counsel regarding strategy for opposition to Tinder Defendants' Motion to Compel Arbitration.	0.50	625.00	\$312.50
06/13/18	JK	Review	review Decl. of Platt re Compliance with Local Rules re: electronic filing.	0.10	725.00	\$72.50
06/13/18	JK	Review	review email from AB re: strategy.	0.10	725.00	\$72.50
06/13/18	JK	Review	review email from AB re: Judge Chen decision re: McGill.	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
06/13/18	JK	Review	review case law and follow up research for opposition to motion to compel arbitration.	0.80	725.00	\$580.00
06/13/18	JK	Review	review statement re: local rule 7-3 conference filed by TMF.	0.10	725.00	\$72.50
06/13/18	JK	Review	review motion for extension of time.	0.20	725.00	\$145.00
06/13/18	JK	Review	review JAM email re: extension of time.	0.10	725.00	\$72.50
06/13/18	JK	Review	review JAM re: deadlines for motion.	0.10	725.00	\$72.50
06/13/18	JM	Review	Review ECF Notice email re Declaration of Robert H. Platt re Compliance with Local Rules re ECF filing	0.10	350.00	\$35.00
06/13/18	JM	Review	Review ECF Notice email re Plaintiff's Statement re Local Rule 7-3 Conference	0.10	350.00	\$35.00
06/13/18	JM	Review	Review ECF Notice email re Plaintiff's Notice of Motion and Motion for Extension of Time to File Plaintiff's Motion for Class Certification	0.10	350.00	\$35.00
06/13/18	JM	Review	Review email from JF re calendar entries for Defendants' Motion to Compel Arbitration	0.10	350.00	\$35.00
06/19/18	JK	Review	review email from TMF re: strategy.	0.10	725.00	\$72.50
06/19/18	JK	Review	review emails from AB re: settlement discussion.	0.10	725.00	\$72.50
06/19/18	JK	Prepare	prepare email to AB re: mediators.	0.10	725.00	\$72.50
06/19/18	JK	Prepare	prepare email to AB re: call on 6/20.	0.10	725.00	\$72.50
06/20/18	JM	Research	Review and research Defendant's Motion to Compel Arbitration or Stay re Colorado River Abstention	1.40	350.00	\$490.00
06/20/18	JM	Draft	Draft email re Defendant's Motion to Compel Arbitration or Stay re Colorado River Abstention research	0.20	350.00	\$70.00
06/20/18	DW	Review	AB email re: amended complaint	0.10	725.00	\$72.50
06/20/18	DW	Review	AB email re: research in opposition to defendant's motion to compel arbitration	0.10	725.00	\$72.50
06/20/18	DW	Review	JK email re: research in opposition to defendant's motion to compel arbitration	0.10	0.00 OT	\$0.00
06/20/18	DW	Review	JM email re: motion to compel arbitration	0.10	725.00	\$72.50
06/20/18	JK	Review	review memo by JAM re: Colorado River Abstention and application to motion to compel arbitration; review cases.	0.60	725.00	\$435.00
06/20/18	JK	Phone Call	Phone call with AB re: motion to compel arbitration.	0.30	725.00	\$217.50
06/20/18	JM	Review	Review email from JPK re research on Defendants' Motion to Compel Arbitration	0.10	350.00	\$35.00
06/20/18	JM	Review	Review email from AB re research on Defendants' Motion to Compel Arbitration	0.10	350.00	\$35.00
06/20/18	JM	Review	Review emails from AB re amended complaint	0.20	350.00	\$70.00
06/21/18	JM	Draft	Draft amended complaint, email re same	0.90	350.00	\$315.00
06/21/18	JM	Draft	Draft Plaintiff's Opposition to Defendants' Motion to Compel Arbitration or Stay re Colorado River Abstention	0.80	350.00	\$280.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
06/21/18	DW	Review	AB email re: amended complaint	0.10	725.00	\$72.50
06/21/18	DW	Review	AB email re: further edits to amended complaint	0.10	725.00	\$72.50
06/21/18	DW	Review	JM email re: draft amended complaint	0.10	725.00	\$72.50
06/21/18	JK	Review	review multiple emails re: Colorado River Abstention and strategy.	0.60	725.00	\$435.00
06/21/18	JM	Review	Review email from AB re draft amended complaint	0.10	350.00	\$35.00
06/21/18	JM	Review	Review email from AB re edits to amended complaint	0.10	350.00	\$35.00
06/22/18	JM	Draft	Draft revised amended complaint, email re same	0.40	350.00	\$140.00
06/22/18	JM	Draft	Continue drafting Plaintiff's Opposition to Defendants' Motion to Compel Arbitration or Stay re Colorado River Abstention	1.60	350.00	\$560.00
06/22/18	DW	Review	ECF notice re: first amended complaint	0.10	725.00	\$72.50
06/22/18	DW	Review	TF email re: revised draft of first amended complaint	0.10	0.00 OT	\$0.00
06/22/18	DW	Review	AB email re: revised draft of amended complaint	0.10	725.00 OT	\$72.50
06/22/18	DW	Review	AB email re: revisions to amended complaint	0.10	725.00	\$72.50
06/22/18	DW	Review	JM email re: amended complaint	0.10	725.00	\$72.50
06/22/18	DW	Review	amended complaint	0.20	725.00	\$145.00
06/22/18	JK	Review	Review FAC draft.	0.40	725.00	\$290.00
06/22/18	JK	Meeting	meet and discuss FAC with JAM.	0.10	725.00	\$72.50
06/22/18	JM	Review	Review email from AB re revised draft of amended complaint	0.20	350.00	\$70.00
06/22/18	JM	Review	Review email from AB re edits to revised draft of amended complaint	0.10	350.00	\$35.00
06/22/18	JM	Review	Review email from AB re further revised draft of amended complaint	0.10	350.00	\$35.00
06/22/18	JM	Review	Review email from TMF re further revised draft of amended complaint	0.10	350.00	\$35.00
06/22/18	JM	Review	Review ECF Notice email re Plaintiff's First Amended Complaint	0.10	350.00	\$35.00
06/23/18	DW	Research	cases cited in defendant's motion to compel arbitration and perform legal research in preparation for opposition thereto	1.50	725.00	\$1,087.50
06/25/18	JM	Draft	Finish drafting Plaintiff's Opposition to Defendants' Motion to Compel Arbitration or Stay re Colorado River Abstention, email draft for review	1.40	350.00	\$490.00
06/25/18	JM	Draft	Revise draft of Plaintiff's Opposition to Defendants' Motion to Compel Arbitration or Stay re Colorado River Abstention, email draft for review	0.60	350.00	\$210.00
06/25/18	JM	Draft	Finalize draft of drafting Plaintiff's Opposition to Defendants' Motion to Compel Arbitration or Stay re Colorado River Abstention, email draft for review	0.80	350.00	\$280.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
06/25/18	DW	Review	JK email re: striking motion for extension to file class cert motion	0.10	725.00	\$72.50
06/25/18	DW	Review	ECF notice re: striking motion for extension of time to file motion for class certification	0.10	0.00 OT	\$0.00
06/25/18	DW	Review	and edit opposition to motion to compel	1.40	725.00	\$1,015.00
06/25/18	CL	Legal Services	Review and revision of draft of opposition to Tinder Defendants' Motion to Compel Arbitration prior to filing.	1.10	625.00	\$687.50
06/25/18	DW	Review	ECF notice re: opposition to motion to compel arb	0.10	725.00	\$72.50
06/25/18	DW	Review	JK email re: redlined opposition to motion to compel arb	0.10	725.00	\$72.50
06/25/18	DW	Review	updated draft re: opposition to motion to compel arb	0.20	725.00	\$145.00
06/25/18	DW	Review	AB email re: redlines to opposition to motion to compel arb	0.10	725.00	\$72.50
06/25/18	DW	Review	AB email re: filing deadline	0.10	725.00	\$72.50
06/25/18	DW	Review	JK email re: opposition to motion to compel arb	0.10	725.00	\$72.50
06/25/18	JK	Review	review order re continuance of clas cert deadline.	0.10	725.00	\$72.50
06/25/18	JK	Review	review email from AB re Order.	0.10	725.00	\$72.50
06/25/18	JK	Review	review email re: suggesting stipulation from Tom Wheeler.	0.10	725.00	\$72.50
06/25/18	JK	Review	review email from TMF re: filing stip for class cert.	0.10	725.00	\$72.50
06/25/18	JK	Prepare	prepare email to JAM re: Order re stip.	0.10	725.00	\$72.50
06/25/18	JK	Review	review draft opposition to motion to compel arb; confer with co counsel, prepare edits	2.50	725.00	\$1,812.50
06/25/18	JM	Review	Review ECF Notice email re striking Plaintiff's Motion for Extension of Time to File Motion for Class Certification	0.10	350.00	\$35.00
06/25/18	JM	Review	Review email from JPK re ECF Notice email re striking Plaintiff's Motion for Extension of Time to File Motion for Class Certification	0.10	350.00	\$35.00
06/25/18	JM	Review	Review email from AB re draft Opposition to Defendants' Motion to Compel Arbitration	0.10	350.00	\$35.00
06/25/18	JM	Review	Review email from JPK re draft Opposition to Defendants' Motion to Compel Arbitration	0.10	350.00	\$35.00
06/25/18	JM	Review	Review email from AB re filing deadline	0.10	350.00	\$35.00
06/25/18	JM	Review	Review email from AB re Opposition to Defendants' Motion to Compel Arbitration	0.10	350.00	\$35.00
06/25/18	JM	Review	Review email from JPK responding to AB email re Opposition to Defendants' Motion to Compel Arbitration	0.10	350.00	\$35.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
06/25/18	JM	Review	Review email from AB re revised draft of Opposition to Defendants' Motion to Compel Arbitration	0.10	350.00	\$35.00
06/25/18	JM	Review	Review email from AB re redlined draft of Opposition to Defendants' Motion to Compel	0.10	350.00	\$35.00
06/25/18	JM	Review	Review email from JPK re redlined draft of Opposition to Defendants' Motion to Compel	0.10	350.00	\$35.00
06/25/18	JM	Review	Review ECF Notice email re Plaintiff's Opposition to Defendants' Motion to Compel Arbitration	0.10	350.00	\$35.00
06/27/18	DW	Review	CL email re: ex parte	0.10	725.00	\$72.50
06/27/18	DW	Review	CL email re: ex parte procedures	0.10	725.00	\$72.50
06/27/18	DW	Review	CL email re: ex parte to submit supplemental authorities	0.10	725.00	\$72.50
06/27/18	DW	Review	JK email re: supplemental authority	0.10	725.00	\$72.50
06/27/18	JF	Prepare	Pursuant to attorney request, prepare shells to ex parte motion to request supplemental briefing to opposition to Motion to Compel Arbitration and proposed order, and notice of supplemental cases.	0.70	175.00	\$122.50
06/27/18	JK	Prepare	prepare email to CML, DW and JAM re: supplemental opposition due to 3d cir. Uber opinion.	0.10	725.00	\$72.50
06/27/18	JK	Review	review CML memo re: dates and deadlines for potential ex parte.	0.20	725.00	\$145.00
06/27/18	JK	Review	review follow up email from CML re: Ex Parte or further case filing.	0.10	725.00	\$72.50
06/27/18	JK	Review	CML email to JF requesting shells on ex parte.	0.10	725.00	\$72.50
06/27/18	JM	Review	Review email from JPK re supplemental authority	0.10	350.00	\$35.00
06/27/18	JM	Review	Review email from CML re supplemental authority	0.10	350.00	\$35.00
06/27/18	JM	Review	Review email from JPK responding to CML re supplemental authority	0.10	350.00	\$35.00
06/27/18	JM	Review	Review email from CML responding to JPK re supplemental authority	0.10	350.00	\$35.00
06/27/18	JM	Review	Review email from CML re ex parte application re supplemental authority	0.10	350.00	\$35.00
06/27/18	JM	Review	Review email from CML re ex parte procedure	0.10	350.00	\$35.00
06/27/18	JM	Review	Review email from CML re ex parte papers	0.10	350.00	\$35.00
06/29/18	JM	Draft	Draft Notice of Supplemental Authority	0.80	350.00	\$280.00
06/29/18	CL	Legal Services	Conference with partner John Kristensen re preparing ex parte application with supplemental authority for court to consider for our opposition to Motion to Compel Arbitration.	0.50	625.00	\$312.50



Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
06/29/18	CL	Legal Services	Prepare draft meet and confer correspondence to defense counsel re ex parte application with supplemental authority for court to consider for our opposition to Motion to Compel Arbitration.	0.40	625.00	\$250.00
06/29/18	CL	Legal Services	Analyze and respond to emails with co-counsel re approval of draft email to defense counsel to meet and confer re ex parte application with supplemental authority for court to consider for our opposition to Motion to Compel Arbitration.	0.30	625.00	\$187.50
06/29/18	CL	Legal Services	Analyze and respond to emails with defense counsel re meet and confer re ex parte application with supplemental authority for court to consider for our opposition to Motion to Compel Arbitration.	0.50	625.00	\$312.50
06/29/18	DW	Review	CL email re: ex parte	0.10	725.00	\$72.50
06/29/18	DW	Review	and edit notice of supplemental authority	0.30	725.00	\$217.50
06/29/18	JK	Review	review CML draft notice of ex parte to defense counsel for edits.	0.20	725.00	\$145.00
06/29/18	JK	Prepare	prepare edits and oversee preparation of ex parte to file supplemental briefing re Cullinane v. Uber Technologies, Inc., et al.,	3.20	725.00	\$2,320.00
06/29/18	JK	Review	review Don Brown response re supplemental briefing.	0.10	725.00	\$72.50
06/29/18	JM	Review	Review email from CML re meet and confer re ex parte application	0.10	350.00	\$35.00
06/29/18	JM	Review	Review email from CML re ex parte papers	0.10	350.00	\$35.00
07/02/18	CL	Legal Services	Analyze and respond to additional emails with defense counsel re meet and confer re ex parte application with supplemental authority for court to consider for our opposition to Motion to Compel Arbitration.	0.20	625.00	\$125.00
07/02/18	CL	Legal Services	Telephone call with defense counsel to complete meet and confer re ex parte application with supplemental authority for court to consider for our opposition to Motion to Compel Arbitration.	0.30	625.00	\$187.50
07/02/18	DW	Review	JF email re: reply to motion to compel arb	0.10	725.00	\$72.50
07/02/18	DW	Review	ECF notice re: reply to motion to compel arb	0.10	725.00	\$72.50
07/02/18	JK	Review	review CML email to Don Brown re: meet and confer.	0.10	725.00	\$72.50
07/02/18	JK	Review	review Tinder Reply for Motion to Compel/Stay.	0.50	725.00	\$362.50
07/02/18	JK	Review	review email from JAM re: assistance for filing ex parte.	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
07/02/18	JM	Review	Review ECF Notice email re Reply to Defendants' Motion to Compel Arbitration	0.10	350.00	\$35.00
07/02/18	JM	Review	Review email from JF re Reply to Defendants' Motion to Compel Arbitration	0.10	350.00	\$35.00
07/03/18	JM	Draft	Prepare draft Plaintiff's Ex Parte Application for Order Permitting Plaintiff to File Supplemental Briefing Pertaining to New Authority	0.50	350.00	\$175.00
07/03/18	JM	Review	Review and prepare for filing Plaintiff's Ex Parte Application for Order Permitting Plaintiff to File Supplemental Briefing Pertaining to New Authority	0.80	350.00	\$280.00
07/03/18	CL	Legal Services	Prepare Ex Parte re Supplemental Authority in support of opposition to Motion to Compel Arbitration.	3.20	625.00	\$2,000.00
07/03/18	CL	Legal Services	Analyze and revise draft of Notice of Supplemental Authority to be filed with Ex Parte re Supplemental Authority in support of opposition to Motion to Compel Arbitration.	0.30	625.00	\$187.50
07/03/18	CL	Legal Services	Prepare notice to defendants of Ex Parte.	0.40	625.00	\$250.00
07/03/18	DW	Review	ECF notice re: notice of supplemental authority	0.10	725.00	\$72.50
07/03/18	DW	Review	ECF notice re: ex parte to submit supplemental briefing	0.10	725.00	\$72.50
07/03/18	DW	Review	CL email re: letter to defense re ex parte application	0.10	725.00	\$72.50
07/03/18	DW	Review	letter to defense re: ex parte application	0.10	725.00	\$72.50
07/03/18	DW	Review	and edit ex parte application to submit supplemental briefing	0.40	0.00 OT	\$0.00
• 07/03/18	JF	Prepare	Pursuant to attorney request, take content of letter prepared by attorney for letter to defense counsel re notice for the ex parte for supplementla briefing and prepare letter and formatting.	0.40	175.00	\$70.00
07/03/18	JK	Review	review ex parte application.	0.20	725.00	\$145.00
07/03/18	JK	Review	review joint stip re: class cert.	0.10	725.00	\$72.50
07/03/18	JM	Review	Review email from CML re letter to Defendants re ex parte application	0.10	350.00	\$35.00
07/03/18	JM	Review	Review ECF Notice email re Plaintiff's Ex Parte Application re Supplemental Briefing	0.10	350.00	\$35.00
07/03/18	JM	Review	Review ECF Notice email re Notice of Supplemental Authority	0.10	350.00	\$35.00
07/05/18	DW	Review	ECF notice re: lodging of defendant's proposed statement of decision	0.10	725.00	\$72.50
07/05/18	DW	Review	ECF notice re: opposition to ex parte	0.10	725.00	\$72.50
07/05/18	DW	Review	ECF notice re: stip to extend class cert motion deadline	0.10	725.00	\$72.50
07/05/18	DW	Review	ECF notice re: stip to extend time to respond to complaint	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
07/05/18	JK	Review	review email from Alexandra Hill re: ex parte.	0.10	725.00	\$72.50
07/05/18	JK	Review	review draft Rule 26 conference report.	0.20	725.00	\$145.00
07/05/18	JK	Review	review stipulation for extension of time	0.10	725.00	\$72.50
07/05/18	JK	Review	review opposition to ex parte.	0.50	725.00	\$362.50
07/05/18	JK	Review	review notice of lodging proposed statement of decision by Tinder.	0.20	725.00	\$145.00
07/05/18	JM	Review	Review ECF Notice email re Stipulation for Extension of Time to Respond to First Amended Complaint	0.10	350.00	\$35.00
07/05/18	JM	Review	Review ECF Notice email re Joint Stipulation for Extension of Time to File Motion for Class Certification	0.10	350.00	\$35.00
07/05/18	JM	Review	Review ECF Notice email re Defendants' Opposition to Plaintiff's Ex Parte Application	0.10	350.00	\$35.00
07/05/18	JM	Review	Review ECF Notice email re Notice of Lodging re Defendants' Proposed Statement of Decision re Motion to Compel Arbitration	0.10	350.00	\$35.00
07/06/18	CL	Legal Services	Analyze Court order denying Ex Parte re Supplemental Authority in support of opposition to Motion to Compel Arbitration.	0.30	625.00	\$187.50
07/06/18	DW	Review	ECF notice re: order denying ex parte application	0.10	725.00	\$72.50
07/06/18	DW	Review	email re Joint Status Report d/l (JF)	0.10	725.00	\$72.50
07/06/18	DW	Review	email re minute order denying P's Ex Parte App (CML)	10.00	725.00	\$7,250.00
07/06/18	CL	Legal Services	Prepare email to partner John Kristensen re: arguments in support for our Ex Parte re Supplemental briefing to our Opposition to Motion to Compel Arbitration.	0.30	625.00	\$187.50
07/06/18	JK	Review	review Order denying ex parte.	0.20	725.00	\$145.00
07/06/18	JK	Review	review AB email re standard for briefing and discretion.	0.10	725.00	\$72.50
07/06/18	JK	Prepare	prepare email response to AB re: EP Order.	0.10	725.00	\$72.50
07/06/18	JK	Review	review emails from AB and CML re: surreply.	0.20	725.00	\$145.00
07/06/18	JK	Review	review email from JF re: upcoming deadline for Rule 26 Report.	0.20	725.00	\$145.00
07/06/18	JM	Review	Review ECF Notice email re Minute Order denying Plaintiff's Ex Parte Application	0.10	350.00	\$35.00
07/06/18	JM	Review	Review email from CML re Minute Order denying Plaintiff's Ex Parte Application	0.10	350.00	\$35.00
07/06/18	JM	Review	Review email from JF re Joint Status Report deadline	0.10	350.00	\$35.00
07/09/18	DW	Review	ECF ntc email re Joint Status Report	0.10	725.00	\$72.50
07/09/18	JK	Review	review email and accompanying edits from Tinder to Rule 26 Report.	0.20	725.00	\$145.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
07/09/18	JK	Review	review email from defense counsel approving Rule 26 report for filing.	0.10	725.00	\$72.50
07/09/18	JM	Review	Review ECF Notice email re Joint Status Report	0.10	350.00	\$35.00
07/11/18	DW	Review	ECF ntc re order stip for ext for Defs to respond to FAC	0.10	725.00	\$72.50
07/11/18	JK	Review	review Order re extension to defendant.	0.10	725.00	\$72.50
07/11/18	JM	Review	Review ECF Notice re Order re Stipulation for Extension of Time for Defendants to respond to the First Amended Complaint	0.10	350.00	\$35.00
07/12/18	DW	Review	ECF ntc re order denying stip ext d/l to file Mx for Class Cert	0.10	725.00	\$72.50
07/12/18	DW	Review	ECF ntc of stmt of decision re order granting Defs' Mx to Compel Arbitration.	0.10	725.00	\$72.50
07/12/18	DW	Review	ECF ntc re Order granting Defs' Mx to Compel Arbitration	0.10	725.00	\$72.50
07/12/18	JK	Review	review email from TMF office re: attendance at hearing.	0.10	725.00	\$72.50
07/12/18	JK	Review	review Order re: Order granting Motion to Compel arbitration.	0.20	725.00	\$145.00
07/12/18	JK	Review	review email from TMF re: appeal.	0.10	725.00	\$72.50
07/12/18	JK	Review	Review Statement of Decision.	0.30	725.00	\$217.50
07/12/18	JK	Review	review Order denying class cert as moot.	0.10	725.00	\$72.50
07/12/18	JK	Prepare	prepare email to CML re: appellate deadlines.	0.10	725.00	\$72.50
07/12/18	JM	Review	Review ECF Notice re Order Granting Defendants' Motion to Compel Arbitration	0.10	350.00	\$35.00
07/12/18	JM	Review	Review ECF Notice re Statement of Decision re Order Granting Defendants; Motion to Compel Arbitration	0.10	350.00	\$35.00
07/12/18	JM	Review	Review ECF Notice re Order Denying Stipulation Extending Plaintiffs' Deadline to File Motion for Class Certification	0.10	350.00	\$35.00
07/13/18	DW	Review	ECF ntc re Ntc of Appeal to 9th Circ.	0.10	725.00	\$72.50
07/13/18	JK	Review	Review Notice of Appeal.	0.10	725.00	\$72.50
07/13/18	JM	Review	Review ECF Notice re Notice of Appeal to the Ninth Circuit	0.10	350.00	\$35.00
07/17/18	DW	Review	email re case number assigned d/l (9th Circ/CML)	0.10	725.00	\$72.50
07/17/18	DW	Review	email re case number assigned d/l (9th Circ/JF)	0.10	725.00	\$72.50
07/17/18	DW	Review	ECF notice re case number assigned d/l (9th Circ)	0.10	725.00	\$72.50
07/17/18	JK	Review	review notification of Ninth Cir. re: notice of appeal and briefing schedule.	0.10	725.00	\$72.50
07/17/18	JK	Review	review email from JF re: deadlines for appeal.	0.10	725.00	\$72.50
07/17/18	JM	Review	Review ECF Notice email re Notification from Ninth Circuit re Case Number Assigned	0.10	350.00	\$35.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
07/17/18	JM	Review	Review email from JF re Notification from Ninth Circuit re Case Number Assigned deadlines	0.10	350.00	\$35.00
07/17/18	JM	Review	Review email from CML re Notification from Ninth Circuit re Case Number Assigned deadlines	0.10	350.00	\$35.00
07/23/18	CL	Legal Services	Prepare client's answer to mediation questionnaire to file in appeals matter.	0.70	625.00	\$437.50
07/23/18	CL	Legal Services	Prepare and respond to emails with co-counsel re review and approval of draft of client's answer to mediation questionnaire to file in appeals matter.	0.30	625.00	\$187.50
07/23/18	DW	Review	email re 9th Circ Questionnaire (JF)	0.10	725.00	\$72.50
07/23/18	DW	Review	draft email re 9th Circ Questionnaire (JF)	0.10	725.00	\$72.50
07/23/18	JF	Research	Per attorney request, look up form for mediation questionnaire and Judge's requirements for the Court.	0.40	175.00	\$70.00
07/23/18	JK	Review	review email from JAM re: status of hearing dates.	0.10	725.00	\$72.50
07/23/18	JK	Review	review 9th Cir. Mediation Questionnaire and accompanying emails.	0.20	725.00	\$145.00
07/23/18	JK	Review	review email from JAM re: filing of Mediation Questionnaire.	0.10	725.00	\$72.50
07/23/18	JM	Draft	Draft email to JF re Ninth Circuit Mediation Questionnaire	0.10	350.00	\$35.00
07/23/18	JM	Review	Review email from JF re Ninth Circuit Mediation Questionnaire	0.10	350.00	\$35.00
08/01/18	CL	Legal Services	Analyze Appeal's court order re mediation issued today.	0.30	625.00	\$187.50
08/01/18	DW	Review	email re ltr to circuit mediator (JPK)	0.10	725.00	\$72.50
08/01/18	JK	Review	review Mediation Order from 9th Cir.	0.10	725.00	\$72.50
08/01/18	JK	Review	review email from AB re: contacting mediator.	0.10	725.00	\$72.50
08/01/18	JK	Prepare	prepare email to staff re: mediation order.	0.10	725.00	\$72.50
08/01/18	JM	Review	Review email from JPK re letter to Circuit mediator	0.10	350.00	\$35.00
08/02/18	DW	Review	email re ltr to circuit mediator (CML)	0.10	725.00	\$72.50
08/02/18	JM	Review	Review email from CML re letter to Circuit mediator	0.10	350.00	\$35.00
08/14/18	CL	Legal Services	Prepare draft letter to Appeals Court mediator re issues in dispute in matter and position re mediation.	0.80	625.00	\$500.00
08/14/18	CL	Legal Services	Analyze and respond to emails with co-counsel re approval of draft letter to Appeals Court mediator re issues in dispute in matter and position re mediation.	0.20	625.00	\$125.00
08/14/18	DW	Review	email re: draft ltr to circuit mediator (AB)	0.10	725.00	\$72.50
08/14/18	DW	Review	email re: ltr to circuit mediator (CML)	0.10	725.00	\$72.50
08/14/18	DW	Review	email re appellate docket (JF)	0.10	725.00	\$72.50
08/14/18	DW	Review	email re mediator's order (CML)	0.10	725.00	\$72.50
08/14/18	DW	Review	email re mediator's order (JF)	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
• 08/14/18	JF	Research	Per the attorney's request, look up assigned court mediator's contact information for submission of our report to court mediator.	0.30	175.00	\$52.50
08/14/18	JK	Review	review email from AB re email to mediator.	0.10	725.00	\$72.50
08/14/18	JK	Review	review email from JF re: deadline to contact Circuit Mediator Kyungah Suk	0.10	725.00	\$72.50
08/14/18	JK	Review	review CML draft correspondence to mediator.	0.30	725.00	\$217.50
08/14/18	JK	Review	review AB suggested edit to mediator.	0.10	725.00	\$72.50
08/14/18	JK	Review	review final version and email to co-counsel of correspondence to mediator.	0.10	725.00	\$72.50
08/14/18	JK	Review	review final correspondence to Ms. Suk, mediator.	0.10	725.00	\$72.50
08/14/18	JM	Review	Review email from JF re Mediator's Order	0.10	350.00	\$35.00
08/14/18	JM	Review	Review email from CML re Mediator's Order	0.10	350.00	\$35.00
08/14/18	JM	Review	Review email from JF re appellate docket	0.10	350.00	\$35.00
08/14/18	JM	Review	Review email from CML re letter to Circuit Mediator	0.10	350.00	\$35.00
08/14/18	JM	Review	Review email from AB re draft letter to Circuit Mediator	0.10	350.00	\$35.00
08/15/18	DW	Review	email to circuit mediator (TW)	0.10	725.00	\$72.50
08/15/18	DW	Review	email re sending ltr to circuit mediator (TW)	0.10	725.00	\$72.50
08/15/18	DW	Review	email re final ltr to circuit mediator (CML)	0.10	725.00	\$72.50
08/15/18	DW	Review	email re: revised ltr to circuit mediator (AB)	0.10	725.00	\$72.50
08/15/18	DW	Review	email re: revised ltr to circuit mediator (CML)	0.10	725.00	\$72.50
08/15/18	JK	Correspondence	to co-counsel re: status of email to mediator.	0.10	725.00	\$72.50
08/15/18	JM	Review	Review email from CML re revised letter to Circuit Mediator	0.10	350.00	\$35.00
08/15/18	JM	Review	Review email from AB re revised letter to Circuit Mediator	0.10	350.00	\$35.00
08/15/18	JM	Review	Review email from CML re final letter to Circuit Mediator	0.10	350.00	\$35.00
08/15/18	JM	Review	Review email from TW re sending letter to Circuit Mediator	0.10	350.00	\$35.00
08/15/18	JM	Review	Review email from TW to Circuit Mediator	0.10	350.00	\$35.00
08/16/18	JK	Review	review Order release case from 9th Cir. mediation.	0.10	725.00	\$72.50
09/06/18	CL	Legal Services	Analyze and respond to emails with co-counsel re handling of upcoming appeals deadline.	0.40	625.00	\$250.00
09/06/18	DW	Review	email re req ext opening brief (CML)	0.10	725.00	\$72.50
09/06/18	DW	Review	email re procedure appeal ext opening brief (CML)	0.10	725.00	\$72.50
09/06/18	DW	Review	email re appeal ext opening brief (CML)	0.10	725.00	\$72.50
09/06/18	DW	Review	email re deadline appeal brief (JPK)	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
09/06/18	DW	Review	email re deadline appeal brief (AB)	0.10	725.00	\$72.50
09/06/18	DW	Review	email re deadline appeal brief (CML)	0.10	725.00	\$72.50
09/06/18	CL	Legal Services	Conduct legal research to prepare Ex Parte re Supplemental Briefing to our Opposition to Motion to Compel Arbitration.	0.30	625.00	\$187.50
09/06/18	JK	Review	review email from CML re: deadline for filing opening brief.	0.10	725.00	\$72.50
09/06/18	JK	Review	review AB email re: filing opening brief.	0.10	725.00	\$72.50
09/06/18	JK	Prepare	Prepare email to KW counsel re: opening brief.	0.10	725.00	\$72.50
09/06/18	JK	Prepare	Prepare email to CML re: obtaining extension to opening brief deadline.	0.10	725.00	\$72.50
09/06/18	JK	Review	review email from CML re: extension.	0.10	725.00	\$72.50
09/06/18	JK	Review	review CML email re: extension procedures.	0.10	725.00	\$72.50
09/06/18	JK	Review	review request from CML for Ninth Circuit exemplar pleading.	0.10	725.00	\$72.50
09/06/18	JM	Review	Review email from CML re appeal brief deadline	0.10	350.00	\$35.00
09/06/18	JM	Review	Review email from AB re appeal brief deadline	0.10	350.00	\$35.00
09/06/18	JM	Review	Review email from JPK re appeal brief deadline	0.10	350.00	\$35.00
09/06/18	JM	Review	Review email from CML re appeal brief extension	0.10	350.00	\$35.00
09/06/18	JM	Review	Review email from CML re appeal brief extension procedure	0.10	350.00	\$35.00
09/06/18	JM	Review	Review email from CML re opening brief extension request	0.10	350.00	\$35.00
09/07/18	DW	Review	email re req ext opening brief (JF)	0.10	725.00	\$72.50
09/07/18	JM	Review	Review email from JF re opening brief extension request	0.10	350.00	\$35.00
09/09/18	CL	Legal Services	Research re options to obtain extension to pleading deadlines in Appeals Court Local Rules.	0.50	625.00	\$312.50
09/10/18	CL	Legal Services	Prepare streamlined request for extension to legal briefing in appeals matter.	0.40	625.00	\$250.00
09/10/18	DW	Review	email re status of opening brief ext (CML)	0.10	725.00	\$72.50
09/10/18	DW	Review	email CML to JPK re procedure to req opening brief ext.	0.10	725.00	\$72.50
09/10/18	DW	Review	email re procedure to req opening brief extension (JPK)	0.10	725.00	\$72.50
09/10/18	DW	Review	email re procedure to req ext opening brief (CML)	0.10	725.00	\$72.50
09/10/18	DW	Review	email re req. extension opening brief (JPK)	0.10	725.00	\$72.50
09/10/18	DW	Review	email re req ext opening brief (CML)	0.10	725.00	\$72.50
09/10/18	JF	Prepare	Per attorney request, create shell for streamlined request in appeals court to extend briefing deadlines.	0.20	175.00	\$35.00
09/10/18	JK	Review	review draft request for extension.	0.20	725.00	\$145.00



Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
09/10/18	JK	Meeting	meeting with CML re: extension.	0.10	725.00	\$72.50
09/10/18	JK	Prepare	prepare email to CML re: extension request.	0.10	725.00	\$72.50
09/10/18	JK	Review	review CML email re: FRAP.	0.10	725.00	\$72.50
09/10/18	JK	Review	review email from JAM re:: DM/ECF for 9th Cir.	0.10	725.00	\$72.50
09/10/18	JK	Prepare	Prepare email to appellate counsel re: double checking procedures for extension.	0.10	725.00	\$72.50
09/10/18	JK	Review	review email from appellate counsel to cross-check re: Form 13.	0.10	725.00	\$72.50
09/10/18	JK	Review	review email from CML to AB/TMF accompanying request for extension, and need for filing.	0.10	725.00	\$72.50
09/10/18	JM	Review	Review email from CML re opening brief extension request	0.10	350.00	\$35.00
09/10/18	JM	Review	Review email from JPK re opening brief extension request	0.10	350.00	\$35.00
09/10/18	JM	Review	Review email from CML re opening brief extension request procedure	0.10	350.00	\$35.00
09/10/18	JM	Review	Review email from JPK re opening brief extension request procedure	0.10	350.00	\$35.00
09/10/18	JM	Review	Review email from CML responding to JPK re opening brief extension request procedure	0.10	350.00	\$35.00
09/10/18	JM	Review	Review email from CML re opening brief extension filing	0.10	350.00	\$35.00
09/11/18	DW	Review	email re req. for ext opening brief (CML)	0.10	725.00	\$72.50
09/11/18	JK	Review	review email from TMF office re: filing.	0.10	725.00	\$72.50
09/11/18	JM	Review	Review email from CML re opening brief extension requested	0.10	350.00	\$35.00
09/12/18	DW	Review	email re appellate docket;status of opening brief ext (JF)	0.10	725.00	\$72.50
09/12/18	DW	Review	email re status of opening brief extension (CML)	0.10	725.00	\$72.50
09/12/18	JK	Review	review email from CML re: status of request for extension.	0.10	725.00	\$72.50
09/12/18	JK	Prepare	Prepare email to CML re: checking on status via Pacer.	0.10	725.00	\$72.50
09/12/18	JK	Review	review email from JF with docket from 9th Cir.	0.10	725.00	\$72.50
09/12/18	JM	Review	Review email from CML re status of opening brief extension	0.10	350.00	\$35.00
09/12/18	JM	Review	Review email from JF re appellate docket, status of opening brief extension	0.10	350.00	\$35.00
09/13/18	JK	Review	review email from AB re granting of extension.	0.10	725.00	\$72.50
09/26/18	JK	Review	review email from AB re Tinder offer.	0.10	725.00	\$72.50
09/26/18	JK	Review	review TMF email in response to Tinder offer.	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
09/26/18	JK	Review	review email setting conference for 9/28 of plaintiff counsel.	0.10	725.00	\$72.50
09/26/18	JK	Prepare	Prepare email with thoughts on Tinder offer.	0.10	725.00	\$72.50
09/26/18	JK	Review	email from TMF looking to discuss Thursday.	0.10	725.00	\$72.50
09/26/18	JK	Prepare	prepare email responding to TMF and AB re call.	0.10	725.00	\$72.50
09/26/18	CL	Legal Services	Analyze emails between co-counsel regarding recent settlement discussions with defense counsel.	0.40	625.00	\$250.00
09/27/18	DW	Review	email re phone conf calendar (CML)	0.10	725.00	\$72.50
09/27/18	JK	Review	review email from TMF re schedule.	0.10	725.00	\$72.50
09/27/18	JK	Prepare	Prepare email re: strategy to Tinder	0.10	725.00	\$72.50
09/27/18	JK	Review	review TMF email re: legal strategy.	0.10	725.00	\$72.50
09/27/18	JK	Review	review correspondence to Tinder's counsel with settlement demand.	0.10	725.00	\$72.50
09/27/18	JM	Review	Review email from CML re phone conference calendar	0.10	350.00	\$35.00
09/28/18	DW	Review	email re phone conf discussion (CML)	0.10	725.00	\$72.50
09/28/18	JK	Phone Call	Phone call with TMF and AB re: responding to Tinder.	0.40	725.00	\$290.00
09/28/18	JK	Review	review AB draft response to Tinder after call.	0.20	725.00	\$145.00
09/28/18	JM	Review	Review email from CML re hone conference discussion	0.10	350.00	\$35.00
10/01/18	DW	Review	email re admission to 9th Circ. (CML)	0.10	725.00	\$72.50
10/01/18	DW	Review	email re appellate briefing (CML)	0.10	725.00	\$72.50
10/01/18	JK	Review	review Don Brown response to email and issue re: appellate briefing.	0.10	725.00	\$72.50
10/01/18	JK	Review	review TMF response to Tinder re: appellate briefing.	0.10	725.00	\$72.50
10/01/18	JK	Review	review email from Bronw re: contacting mediator.	0.10	725.00	\$72.50
10/01/18	JK	Review	review proposed email to 9th Cir. mediator prepared by Tinder's counsel.	0.10	725.00	\$72.50
10/01/18	JK	Review	review email from CML re: 9th Cir. ECF and JPK status.	0.10	725.00	\$72.50
10/01/18	JK	Review	review correspondence from Don Brown to Mediator Suk.	0.10	725.00	\$72.50
10/01/18	JM	Review	Review email from CML re appellate briefing	0.10	350.00	\$35.00
10/01/18	JM	Review	Review email from CML re admission to Ninth Circuit	0.10	350.00	\$35.00
10/03/18	DW	Review	email re appellate briefing caption page (CML)	0.10	725.00	\$72.50
10/03/18	JK	Review	review email from mediator.	0.10	725.00	\$72.50
10/03/18	JK	Review	Review Don Brown email commenting on 9th Cir. mediator email.	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
10/03/18	JK	Review	review email from AB re: length of extension and mediators.	0.10	725.00	\$72.50
10/03/18	JK	Review	review email from AB re: KW writing motion for extension.	0.10	725.00	\$72.50
10/03/18	JK	Prepare	Prepare email to CML assigning task for motion for extension.	0.10	725.00	\$72.50
10/03/18	JK	Review	review email from and 9th Cir. Rules re: extension.	0.20	725.00	\$145.00
10/03/18	JK	Review	Review Don Brown email re: 60 days extension and mediators.	0.10	725.00	\$72.50
10/03/18	JK	Review	review email from AB of potential mediators.	0.10	725.00	\$72.50
10/03/18	JK	Review	review exemplar motions for extensions.	0.30	725.00	\$217.50
10/03/18	JK	Prepare	Prepare email to G. Simms re exemplar motions for extension.	0.10	725.00	\$72.50
10/03/18	JK	Prepare	Prepare email to co counsel re: potential mediators.	0.10	725.00	\$72.50
10/03/18	JK	Review	review email from AB to D. Brown with proposed mediators.	0.10	725.00	\$72.50
10/03/18	JK	Review	Review draft of Motion for Extension and Dec of TMF.	0.40	725.00	\$290.00
10/03/18	JK	Prepare	Prepare email to TMF and AB accompanying motion.	0.10	725.00	\$72.50
10/03/18	CL	Prepare	Unopposed motion for extension for filing brief and declaration of Todd M. Friedman	2.80	625.00	\$1,750.00
10/03/18	JM	Review	Review email from CML re appellate briefing caption page	0.10	350.00	\$35.00
10/04/18	DW	Review	email re calendaring appellate briefing d/l (extended) (CML)	0.10	725.00	\$72.50
10/04/18	JK	Review	review email from G. Simms re: motion.	0.10	725.00	\$72.50
10/04/18	JK	Review	review email from CML to TMF re: motion.	0.10	725.00	\$72.50
10/04/18	JK	Review	review email from TMF re filing.	0.10	725.00	\$72.50
10/04/18	JK	Review	review CML email re deadline for fling motion to extend.	0.10	725.00	\$72.50
10/04/18	JK	Review	review email from TMF to AB re filing.	0.10	725.00	\$72.50
10/04/18	JK	Review	review AB email re filing motion for extension.	0.10	725.00	\$72.50
10/04/18	JK	Review	review email from AB confirming filing of motion for extension.	0.10	725.00	\$72.50
10/04/18	JK	Review	review email from Don Brown re: mediators.	0.10	725.00	\$72.50
10/04/18	JK	Review	review email from AB re: Judge Meisinger.	0.10	725.00	\$72.50
10/04/18	JK	Prepare	Prepare email to Don Brown re: Judge Meisinger.	0.10	725.00	\$72.50
10/04/18	JK	Review	review email from AB re: motion for extension being granted.	0.10	725.00	\$72.50
10/04/18	JK	Review	Reviewing email from AB with potential mediation dates.	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
10/04/18	JK	Review	review email from Don Brown re: mediation dates.	0.10	725.00	\$72.50
10/04/18	JK	Review	review email from CML re: deadlines for brief.	0.10	725.00	\$72.50
10/04/18	JK	Review	review email from TMF re: mediation date and appellate date.	0.10	725.00	\$72.50
10/04/18	JK	Review	review email from Don Brown re: mediation dates.	0.10	725.00	\$72.50
10/04/18	JK	Review	review email from CML re: plaintiff.	0.10	725.00	\$72.50
10/04/18	JK	Prepare	Prepare email to all counsel re: appellate briefing date and mediation dates.	0.10	725.00	\$72.50
10/04/18	JM	Review	Review email from CML re calendaring extended appellate briefing deadlines	0.10	350.00	\$35.00
10/05/18	JK	Review	review email from Don Brown re mediation date.	0.10	725.00	\$72.50
10/05/18	JK	Review	review email from AB re date and class discovery.	0.10	725.00	\$72.50
10/05/18	JK	Review	review email from Don Brown re: class discovery.	0.10	725.00	\$72.50
10/05/18	JK	Review	review email from AB confirming mediation.	0.10	725.00	\$72.50
10/05/18	JK	Review	review email form mediators office with agreement and fee rate.	0.10	725.00	\$72.50
10/12/18	VB	Documentation	calendared mediation information	0.10	175.00	\$17.50
10/12/18	JK	Review	review email from AB re: all with defense counsel and strategy.	0.20	725.00	\$145.00
10/12/18	JK	Prepare	prepare email to KW re costs of Tinder mediation.	0.10	725.00	\$72.50
10/12/18	CL	Legal Services	Analyze confirmation of mediation and details from mediator's office.	0.20	625.00	\$125.00
10/15/18	DW	Review	email re mediator (CML)	0.10	725.00	\$72.50
10/15/18	JK	Prepare	Prepare email to MS and VB accompanying fee schedule.	0.10	725.00	\$72.50
10/15/18	JK	Review	review email from CML re costs of mediation.	0.10	725.00	\$72.50
10/15/18	JM	Review	Review email from CML re mediator	0.10	350.00	\$35.00
11/02/18	JK	Review	Review email from Don Brown and accompanying Joint Status Report.	0.20	725.00	\$145.00
11/02/18	JK	Review	review email from TMF re Joint Status Report.	0.10	725.00	\$72.50
11/08/18	DW	Review	ECF notice email re Joint Status Report	0.10	725.00	\$72.50
11/08/18	JK	Review	review ECF re Joint Status Report.	0.10	725.00	\$72.50
11/08/18	JM	Review	Review ECF Notice email re Joint Status Report	0.10	350.00	\$35.00
11/11/18	VB	Documentation	reviewed and saved docket 48	0.10	175.00	\$17.50
11/19/18	DW	Review	email re mediation brief (CML)	0.10	725.00	\$72.50
11/19/18	DW	Review	email re mediation calendaring (VB)	0.10	725.00	\$72.50
11/19/18	DW	Review	email re mediation invoice (TMF)	0.10	725.00	\$72.50
11/19/18	DW	Review	email re mediation invoice (CML)	0.10	725.00	\$72.50
11/19/18	DW	Review	email re mediation brief (CML)	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
11/19/18	DW	Review	email re mediation brief (AB)	0.10	725.00	\$72.50
11/19/18	DW	Review	email re mediation brief (CML)	0.10	725.00	\$72.50
11/19/18	DW	Review	email re mediation calendaring (CML)	0.10	725.00	\$72.50
11/19/18	VB	Documentation	calendared brief deadline	0.10	175.00	\$17.50
11/19/18	VB	E103 Word processing	Prepared mediation brief shell	0.50	175.00	\$87.50
11/19/18	JK	Review	review CML email re: mediation brief scheduling.	0.10	725.00	\$72.50
11/19/18	JK	Review	review email from CML re: delegation of duties for mediation brief.	0.10	725.00	\$72.50
11/19/18	JK	Review	review email from AB re: mediation brief.	0.10	725.00	\$72.50
11/19/18	JK	Review	review email from CML re: mediation brief and drafting.	0.10	725.00	\$72.50
11/19/18	JK	Review	review CML email re costs of mediation.	0.10	725.00	\$72.50
11/19/18	JK	Review	review email from TMF re: costs at mediation.	0.10	725.00	\$72.50
11/19/18	JK	Review	review email from CML re costs at mediation.	0.10	725.00	\$72.50
11/19/18	JK	Review	review VB email to staff re mediation.	0.10	725.00	\$72.50
11/19/18	JK	Review	review CML email to staff re logistics of mediation brief.	0.10	725.00	\$72.50
11/19/18	JK	Prepare	prepare email to co counsel re: being in trial and needing assistance on brief.	0.10	725.00	\$72.50
11/19/18	JK	Review	review correspondence from Judge Meisinger's office re: mediation.	0.10	725.00	\$72.50
11/19/18	JM	Review	Review email from CML re mediation calendaring	0.10	350.00	\$35.00
11/19/18	JM	Review	Review email from CML re mediation brief	0.10	350.00	\$35.00
11/19/18	JM	Review	Review email from AB re mediation brief	0.10	350.00	\$35.00
11/19/18	JM	Review	Review email from CML re mediation brief	0.10	350.00	\$35.00
11/19/18	JM	Review	Review email from CML re mediation invoice	0.10	350.00	\$35.00
11/19/18	JM	Review	Review email from TMF re mediation invoice	0.10	350.00	\$35.00
11/19/18	JM	Review	Review email from VB re mediation calendaring	0.10	350.00	\$35.00
11/19/18	JM	Review	Review email from CML re mediation brief	0.10	350.00	\$35.00
11/19/18	CL	Legal Services	Analyze emails between counsel for defense and plaintiffs regarding the set up of a mediation.	0.50	625.00	\$312.50
11/19/18	CL	Legal Services	Analyze and respond to emails with co-counsel re strategy and preparation for upcoming mediation.	0.50	625.00	\$312.50
11/20/18	DW	Review	email re mediation brief (VB)	0.10	725.00	\$72.50
11/20/18	VB	Research	Researched 9th Circuit admittance	0.25	175.00	\$43.75
11/20/18	JK	Review	review email from TMF re: attendance at mediation.	0.10	725.00	\$72.50
11/20/18	JK	Review	review email from Christina Le re: attendants at mediation.	0.10	725.00	\$72.50
11/20/18	JM	Review	Review email from VB re draft mediation brief	0.10	350.00	\$35.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
11/20/18	CL	Legal Services	Prepare Ninth Circuit appeals documents for application to practice in court for work on Tinder appeal and to file Notice of Appearance for firm.	0.40	625.00	\$250.00
11/21/18	JK	Prepare	prepare email correspondence to Judge Meisinger's staff.	0.10	725.00	\$72.50
11/21/18	JK	Review	review email from CB re: ECF login and Tina's application for Ninth Circuit.	0.10	725.00	\$72.50
11/21/18	JK	Review	review email from CML re: ECF login and notices of appearance in 9th Cir. appeal.	0.10	725.00	\$72.50
11/21/18	CL	Legal Services	Analyze emails from mediator's office following up on attendance and mediation briefs for the mediation.	0.20	625.00	\$125.00
11/26/18	VB	Documentation	Troubleshooting and Updating 9th Circuit information	0.50	175.00	\$87.50
11/26/18	JK	Review	review email from Judge Meisinger's staff re briefs.	0.10	725.00	\$72.50
11/26/18	JK	Review	review email from CML re: status of brief to Judge Meisinger's office.	0.10	725.00	\$72.50
11/26/18	JK	Review	review notice of appearance filing for JPK in 9th Cir.	0.10	725.00	\$72.50
11/27/18	DW	Review	email re draft mediation (AB)	0.10	725.00	\$72.50
11/27/18	DW	Review	email re mediation brief (CML)	0.10	725.00	\$72.50
11/27/18	VB	Research	Researched related docket for attorneys	0.25	175.00	\$43.75
11/27/18	VB	Documents for Court	Prepped and filed notice of appearance	0.50	175.00	\$87.50
11/27/18	VB	E103 Word processing	Formatted mediation brief	1.00	175.00	\$175.00
11/27/18	JK	Review	review CML notice of appearance in 9th Cir.	0.10	725.00	\$72.50
11/27/18	JK	Review	Review mediation brief.	0.70	725.00	\$507.50
11/27/18	JK	Review	review AB email re: brief.	0.10	725.00	\$72.50
11/27/18	JK	Review	review email from AB re: contacting potential administrators.	0.10	725.00	\$72.50
11/27/18	JM	Review	Review email from CML re draft mediation brief	0.10	350.00	\$35.00
11/27/18	JM	Review	Review email from AB re draft mediation brief	0.10	350.00	\$35.00
11/27/18	CL	Legal Services	Analyze status of the Court's acceptance of our Notice of Appearance in appeals case.	0.30	625.00	\$187.50
11/27/18	CL	Legal Services	Analyze current status of Candelore v. Tinder, similar matter, in anticipation of potential objection by plaintiff in that case to any settlement in our case.	0.60	625.00	\$375.00
11/27/18	CL	Legal Services	Prepare initial draft of mediation brief.	6.10	625.00	\$3,812.50
11/27/18	CL	Legal Services	Analyze and respond to emails with co-counsel re review and completion of mediation brief.	0.40	625.00	\$250.00
11/28/18	DW	Review	email re mediation brief (AB)	0.10	725.00	\$72.50
11/28/18	DW	Review	email re mediation brief (VB)	0.10	725.00	\$72.50
11/28/18	DW	Review	email re redlined med brief (CML)	0.10	725.00	\$72.50
11/28/18	DW	Review	email re redlined mediation brief (AB)	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
11/28/18	DW	Review	email re mediation brief (TMF)	0.10	725.00	\$72.50
11/28/18	DW	Review	email re mediation brief (CML)	0.10	725.00	\$72.50
11/28/18	DW	Review	email re mediation brief (AB)	0.10	725.00	\$72.50
11/28/18	DW	Review	email re mediation brief (CML)	0.10	725.00	\$72.50
11/28/18	DW	Review	email re mediation brief AB	0.10	725.00	\$72.50
11/28/18	JK	Review	review email from CML to Judge Meisinger's staff re attendance at mediation.	0.10	725.00	\$72.50
11/28/18	JK	Review	review email from AB re: upcoming revisions to brief.	0.10	725.00	\$72.50
11/28/18	JK	Review	review email from AB re incentive award.	0.10	725.00	\$72.50
11/28/18	JK	Review	review email from CML re incentive award.	0.10	725.00	\$72.50
11/28/18	JK	Review	review TMF email re class incentive.	0.10	725.00	\$72.50
11/28/18	JK	Review	review AB edits to mediation brief.	0.30	725.00	\$217.50
11/28/18	JK	Research	research case law in anticipation of mediation.	0.30	725.00	\$217.50
11/28/18	JK	Review	review final draft of mediation brief.	0.20	725.00	\$145.00
11/28/18	JK	Review	review correspondence accompanying final mediation brief to Judge Meisinger.	0.10	725.00	\$72.50
11/28/18	JK	Prepare	Prepare email to Judge Meisinger.	0.10	725.00	\$72.50
11/28/18	JK	Review	review email from Judge Meisinger's office re: acknowledging acceptance of brief.	0.10	725.00	\$72.50
11/28/18	JM	Review	Review email from AB re draft mediation brief	0.10	350.00	\$35.00
11/28/18	JM	Review	Review email from CML re draft mediation brief	0.10	350.00	\$35.00
11/28/18	JM	Review	Review email from AB re content of draft mediation brief	0.10	350.00	\$35.00
11/28/18	JM	Review	Review email from CML re content of draft mediation brief	0.10	350.00	\$35.00
11/28/18	JM	Review	Review email from TMF re content of draft mediation brief	0.10	350.00	\$35.00
11/28/18	JM	Review	Review email from AB re redlined mediation brief	0.10	350.00	\$35.00
11/28/18	JM	Review	Review email from CML re redlined mediation brief	0.10	350.00	\$35.00
11/28/18	JM	Review	Review email from VB re final draft of mediation brief	0.10	350.00	\$35.00
11/28/18	JM	Review	Review email from AB re final draft of mediation brief	0.10	350.00	\$35.00
11/28/18	CL	Legal Services	Analyze and respond to emails with co-counsel regarding changes to the mediation brief draft.	1.10	625.00	\$687.50
11/28/18	CL	Legal Services	Prepare additional revisions to mediation brief after review by co-counsel.	0.70	625.00	\$437.50
11/29/18	JK	Mediation	Travel from Riverside to Mediation downtown, then home.	5.00	725.00	\$3,625.00
11/29/18	JK	Review	review email from VB re: status of brief.	0.10	725.00	\$72.50



Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
11/29/18	JK	Review	review email from CML re: payment for mediation.	0.10	725.00	\$72.50
11/29/18	JK	Review	review TMF email re payment.	0.10	725.00	\$72.50
11/29/18	JK	Review	review email from MS re: payment for mediation.	0.10	725.00	\$72.50
11/29/18	JK	Prepare	prepare multiple texts to CML and AB re status of mediation.	0.30	725.00	\$217.50
11/29/18	JK	Phone Call	Phone calls with AB and CML re: mediation status.	0.50	725.00	\$362.50
11/29/18	CL	Legal Services	Attendance at mediation with all parties and Mediator Meisinger.	10.60	625.00	\$6,625.00
11/29/18	CL	Travel	Travel to and from office to attend mediation in Downtown LA.	1.70	625.00	\$1,062.50
11/29/18	CL	Legal Services	Analyze and respond to emails with co-counsel's office to follow-up re payment for mediation.	0.50	625.00	\$312.50
11/30/18	JK	Review	review email from AB acceptance proposal.	0.10	725.00	\$72.50
12/01/18	JK	Review	review email from Judge Meisinger confirming agreement of proposal.	0.10	725.00	\$72.50
12/01/18	JK	Review	review email from TMF re settlement.	0.10	725.00	\$72.50
12/01/18	JK	Review	review email from CML re: settlement.	0.10	725.00	\$72.50
12/01/18	CL	Legal Services	Analyze and respond to emails with co-counsel information our office that Mediator Meisinger reported that the parties have reached a settlement.	0.30	625.00	\$187.50
12/03/18	JK	Review	review email from CML re: next steps to effectuate settlement.	0.10	725.00	\$72.50
12/03/18	JK	Review	review TMF email re draft settlement agreement.	0.10	725.00	\$72.50
12/03/18	JK	Prepare	Prepare email re: procedures with appeal and settlement.	0.10	725.00	\$72.50
12/03/18	JK	Review	review TMF email re: delegation of duties between firms.	0.10	725.00	\$72.50
12/03/18	JK	Prepare	Prepare email re: delegation and instructions to CML.	0.10	725.00	\$72.50
12/03/18	JK	Review	Review email from TMF re: prelim papers.	0.10	725.00	\$72.50
12/03/18	JK	Review	email from CML re: terms of settlement.	0.10	725.00	\$72.50
12/03/18	JK	Review	review email from TMF to AB re settlement.	0.10	725.00	\$72.50
12/03/18	JK	Review	review email from AB re settlement terms.	0.10	725.00	\$72.50
12/03/18	CL	Legal Services	Analyze and respond to emails with co-counsel regarding coordination of handling of work related to finalization of the settlement.	0.40	625.00	\$250.00
12/05/18	JK	Review	review email from TMF re: Tinder and allocation between plaintiff and defendant re: motions/agreement.	0.10	725.00	\$72.50
12/05/18	JK	Prepare	Prepare email to TMF re: delegation of duties.	0.10	725.00	\$72.50
12/05/18	JK	Review	review email between DB and TMF.	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
12/05/18	JK	Review	review email from TMF to CML re: motion.	0.10	725.00	\$72.50
12/05/18	JK	Review	review email from CML re: status of motion.	0.10	725.00	\$72.50
12/05/18	JK	Review	review email form TMF re status of motion.	0.10	725.00	\$72.50
12/05/18	CL	Legal Services	Analyze and respond to emails with defense counsel regarding coordination of work to prepare and finalize settlement agreement and other settlement finalization documents.	0.50	625.00	\$312.50
12/05/18	CL	Legal Services	Analyze emails with co-counsel re coordination of work for finalization of the settlement.	0.30	625.00	\$187.50
12/06/18	JK	Review	review email from TMF to CML re status of motion.	0.10	725.00	\$72.50
12/06/18	JK	Review	review email from CML re: status of procedures to file motions.	0.10	725.00	\$72.50
12/06/18	JK	Review	review exemplar motions for approval from TMF to CML.	0.20	725.00	\$145.00
12/06/18	JK	Review	review email from CML re status of motion.	0.10	725.00	\$72.50
12/06/18	JK	Review	review email from CML re: MOU terms.	0.10	725.00	\$72.50
12/06/18	JK	Review	review email from AB re: MOU.	0.10	725.00	\$72.50
12/06/18	JK	Review	Review email from CML to Don Brown re: MOU.	0.10	725.00	\$72.50
12/06/18	JK	Review	review email from Don Brown re: terms.	0.10	725.00	\$72.50
12/06/18	CL	Legal Services	Analyze additional emails with co-counsel re coordination of work for completion of the motion for preliminary approval of settlement.	0.40	625.00	\$250.00
12/06/18	CL	Legal Services	Analyze emails between defense counsel, our office and co-counsel regarding all the agreed to terms for the settlement agreement.	0.40	625.00	\$250.00
12/07/18	JK	Review	review email from CML re guidance on appeals.	0.10	725.00	\$72.50
12/07/18	JK	Review	review email from TMF re: appeal briefing.	0.10	725.00	\$72.50
12/07/18	JK	Review	review email from CML re: appeal status report.	0.10	725.00	\$72.50
12/07/18	JK	Review	review notice of settlement in 9th Cir.	0.20	725.00	\$145.00
12/07/18	JK	Review	review email from CML re: sending notice of settlement to defense counsel.	0.10	725.00	\$72.50
12/07/18	JK	Review	review email from CML to Don Brown re notice of settlement.	0.10	725.00	\$72.50
12/07/18	JK	Review	review Don Brown email re notice of settlement.	0.10	725.00	\$72.50
12/07/18	JK	Review	review draft of Motion for Preliminary Approval.	0.80	725.00	\$580.00
12/07/18	CL	Legal Services	Start initial draft of Motion for Preliminary Approval of Settlement.	8.40	625.00	\$5,250.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
12/07/18	CL	Legal Services	Analyze and respond to appeals expert Gary Simms with question regarding handling of current appeal with settlement of matter pending.	0.30	625.00	\$187.50
12/07/18	CL	Legal Services	Research relevant 9th Circuit Court of Appeal rules and any relevant cases to determine what to report to Court re status of settlement and stay of the appeal deadlines.	3.10	625.00	\$1,937.50
12/07/18	CL	Prepare	Prepare draft of Notice of Settlement to file in the Appeals Court.	0.50	625.00	\$312.50
12/07/18	CL	Legal Services	Analyze and respond to emails with defense counsel regarding their review and approval of the Notice of Settlement for filing in the Appeals case.	0.40	625.00	\$250.00
12/07/18	CL	Legal Services	Analyze and respond to emails with co-counsel regarding input on relief requested in Notice of Settlement to be filed in Appeals Court.	0.40	625.00	\$250.00
12/08/18	CL	Legal Services	Continue preparation of initial draft of motion for preliminary approval of settlement.	2.40	625.00	\$1,500.00
12/09/18	JK	Review	review defense redlines to notice of settlement.	0.10	725.00	\$72.50
12/09/18	JK	Prepare	Prepare email to co counsel re defense redlines to notice of settlement.	0.10	725.00	\$72.50
12/09/18	CL	Legal Services	Analyze email from defense counsel with revisions to the Notice of Settlement to be filed in Appeals Court.	0.30	625.00	\$187.50
12/10/18	JK	Review	Review TMF email re: defense redlines to Notice of settlement.	0.10	725.00	\$72.50
12/10/18	JK	Review	review TMF email to Don Brown re: call and redlines.	0.10	725.00	\$72.50
12/10/18	JK	Review	review email from Don Brown re: call.	0.10	725.00	\$72.50
12/10/18	JK	Review	review TMF email to Don Brown re: call.	0.10	725.00	\$72.50
12/10/18	JK	Review	review motion to extend time.	0.10	725.00	\$72.50
12/10/18	JK	Review	review CML email re filing of motion to extend time and new deadlines.	0.10	725.00	\$72.50
12/10/18	CL	Legal Services	Analyze emails between Plaintiff and defense counsel discussing finalization of the content and draft of the Notice of Settlement.	0.60	625.00	\$375.00
12/11/18	DW	Review	email re app briefing ext (LP)	0.10	725.00	\$72.50
12/11/18	DW	Review	email re app briefing ext (VB)	0.10	725.00	\$72.50
12/11/18	DW	Review		0.10	725.00	\$72.50
12/11/18	JK	Review	review Order granting motion to extend time.	0.10	725.00	\$72.50
12/11/18	JK	Review	review VB email with dates on appellate briefing.	0.10	725.00	\$72.50
12/11/18	JM	Review	Review email from CML re appellate briefing extension deadline calendaring	0.10	350.00	\$35.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
12/11/18	JM	Review	Review email from VB re appellate briefing extension calendaring	0.10	350.00	\$35.00
12/11/18	JM	Review	Review email from LP re appellate briefing extension calendaring	0.10	350.00	\$35.00
12/11/18	CL	Legal Services	Analyze Court of Appeal's order after providing to the Court of Appeal with notice of settlement in District Court case.	0.20	625.00	\$125.00
12/12/18	JK	Prepare	Prepare email to AB and Don Brown re status of agreement.	0.10	725.00	\$72.50
12/12/18	JK	Review	review email from Don Brown re status of agreement.	0.10	725.00	\$72.50
12/12/18	JK	Review	review email from AB re administrators.	0.10	725.00	\$72.50
12/12/18	JK	Review	review email from Don Brown re administrators.	0.10	725.00	\$72.50
12/13/18	JK	Review	review draft Settlement Agreement, Notice and Claim Form	0.60	725.00	\$435.00
12/13/18	CL	Legal Services	Analyze draft of settlement agreement with the attachments prepared by defense counsel, received via email.	0.50	625.00	\$312.50
12/14/18	JK	Review	review proposed orders for preliminary and final approval.	0.30	725.00	\$217.50
12/14/18	CL	Legal Services	Analyze email from defense counsel with additional attachments to the draft settlement agreement.	0.40	625.00	\$250.00
12/16/18	JK	Prepare	Prepare correspondence to CML re status of Motion for Preliminary Approval.	0.10	725.00	\$72.50
12/18/18	JK	Review	review Ab email re: status of reviewing settlement agreement and claim notices.	0.10	725.00	\$72.50
12/18/18	JK	Review	review CML updates to motion for preliminary approval.	0.20	725.00	\$145.00
12/20/18	JK	Review	review email from Don Brown re status of agreement.	0.10	725.00	\$72.50
12/20/18	JK	Review	review email and accompany edits to release from AB.	0.30	725.00	\$217.50
12/20/18	JK	Review	review TMF re: notice of finalization of agreement.	0.10	725.00	\$72.50
12/20/18	CL	Legal Services	Analyze emails between defense and plaintiff's counsel discussing finalization of the Settlement Agreement.	0.40	625.00	\$250.00
12/21/18	JK	Review	review email from Don Brown re phone call to discuss redlines.	0.10	725.00	\$72.50
12/21/18	JK	Review	review TMF edits to notices.	0.20	725.00	\$145.00
12/21/18	CL	Legal Services	Analyze email from co-counsel with revisions to the settlement agreement prepared by defense counsel, with the attachments.	0.50	625.00	\$312.50
12/24/18	JK	Review	review email with edits from Don Brown to Agreement.	0.20	725.00	\$145.00
12/24/18	CL	Legal Services	Analyze emails from defense counsel discussing changes to the draft settlement agreement.	0.30	625.00	\$187.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
12/31/18	DW	Review	email re settlement agreement (CML)	0.10	725.00	\$72.50
12/31/18	DW	Review	email re: settlement agreement (CML)	0.10	725.00	\$72.50
12/31/18	DW	Review	email re settlement agreement (AB)	0.10	725.00	\$72.50
12/31/18	DW	Review	email re settlement agreement (CML)	0.10	725.00	\$72.50
12/31/18	JK	Review	review AB edits to settlement agreement.	0.20	725.00	\$145.00
12/31/18	JK	Review	review email from Ab re: obtaining declaration from client.	0.10	725.00	\$72.50
12/31/18	JK	Review	review email from Don Brown re executing agreement.	0.10	725.00	\$72.50
12/31/18	JK	Review	review email from TMF to CML re: executing agreement.	0.10	725.00	\$72.50
12/31/18	JK	Review	review email with client's executed agreement.	0.10	725.00	\$72.50
12/31/18	JK	Review	review email from TMF re: filing motion to get case in front of District Court Judge for approval.	0.10	725.00	\$72.50
12/31/18	JK	Review	review email from CML to client.	0.10	725.00	\$72.50
12/31/18	JK	Review	review email from AB re: KW signature to agreement.	0.10	725.00	\$72.50
12/31/18	JK	Review	review email from TMF re sending client's executed agreement to defense counsel.	0.10	725.00	\$72.50
12/31/18	JK	Review	review email from Ab re procedure.	0.10	725.00	\$72.50
12/31/18	JK	Review	review email from Don Brown with his signature to agreement.	0.10	725.00	\$72.50
12/31/18	JK	Review	review email from TMF re: filing motion for district court being performed by KW.	0.10	725.00	\$72.50
12/31/18	JK	Review	review AB email re strategy.	0.10	725.00	\$72.50
12/31/18	JK	Review	review AB email and accompanying draft motion for preliminary approval.	0.30	725.00	\$217.50
12/31/18	JM	Review	Review email from CML re settlement agreement and release signature	0.10	350.00	\$35.00
12/31/18	JM	Review	Review email from AB re settlement agreement and release signature	0.10	350.00	\$35.00
12/31/18	JM	Review	Review email from CML re settlement agreement and release signature	0.10	350.00	\$35.00
12/31/18	JM	Review	Review email from CML re signed settlement agreement and release	0.10	350.00	\$35.00
12/31/18	JM	Review	Review email from DB re signed settlement agreement and release	0.10	350.00	\$35.00
12/31/18	JM	Review	Review email from AB re motion for preliminary approval	0.10	350.00	\$35.00
12/31/18	DW	Review	AB email re: motion for preliminary approval	0.10	725.00	\$72.50
12/31/18	DW	Review	DB email re: settlement agreement	0.10	725.00	\$72.50
12/31/18	CL	Legal Services	Analyze emails between Plaintiff and Defense counsel with additional changes confirmed to the settlement agreement and discussion regarding obtaining executed documents and other efforts to finalize settlement.	0.60	625.00	\$375.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
12/31/18	CL	Legal Services	Analyze emails between our office and co-counsel's office regarding obtaining client's execution of the settlement agreement and completing the preparation of other documents pertaining to the Motion for Preliminary Approval of the Settlement.	0.80	625.00	\$500.00
12/31/18	CL	Legal Services	Communications with client via text message and email to coordinate the execution of the Settlement Agreement.	0.50	625.00	\$312.50
12/31/18	CL	Legal Services	Analyze email from co-counsel to all counsel with current draft of Motion for Preliminary Approval of Settlement, with review of draft.	0.50	625.00	\$312.50
01/02/19	JK	Review	review email from CML re status of JPK declaration and Stip.	0.10	725.00	\$72.50
01/02/19	JK	Review	review email from Don Brown re plaintiff edits.	0.10	725.00	\$72.50
01/02/19	JK	Review	review email from Don Brown with Tinder signatures to settlement agreement.	0.10	725.00	\$72.50
01/02/19	JK	Review	review email accompanying AB signature to agreement.	0.10	725.00	\$72.50
01/02/19	JK	Review	review joint stipulation to lift stay and proposed order.	0.20	725.00	\$145.00
01/02/19	JK	Review	review draft declaration for motion for preliminary approval.	0.50	725.00	\$362.50
01/02/19	JK	Review	review edited joint stipulation re stay and proposed order.	0.10	725.00	\$72.50
01/02/19	JK	Review	review email of fully executed settlement agreement.	0.10	725.00	\$72.50
01/02/19	JK	Review	review email to defense counsel accompanying joint stipulation.	0.10	725.00	\$72.50
01/02/19	JM	Review	Review email from CML re JPK declaration and draft stipulation	0.10	350.00	\$35.00
01/02/19	JM	Review	Review email from DB re motion for preliminary approval	0.10	350.00	\$35.00
01/02/19	JM	Review	Review email from DB re signatures re settlement agreement and release	0.10	350.00	\$35.00
01/02/19	JM	Review	Review email from MW re signature re settlement agreement and release	0.10	350.00	\$35.00
01/02/19	DW	Review	MW email re: settlement agreement	0.10	725.00	\$72.50
01/02/19	DW	Review	DB email re: settlement agreement	0.10	725.00	\$72.50
01/02/19	DW	Review	DB email re: motion for preliminary approval	0.10	0.00 OT	\$0.00
01/02/19	DW	Review	CL email re: JK declaration and draft stipulation	0.10	725.00	\$72.50
01/08/19	JK	Review	review edits by defense counsel to joint motion to lift stay.	0.10	725.00	\$72.50
01/08/19	JK	Review	review edits by defense counsel to motion for preliminary approval.	0.20	725.00	\$145.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
01/08/19	JK	Review	review email from defense counsel approving filing joint stipulation to lift stay.	0.10	725.00	\$72.50
01/08/19	JK	Review	review email from CML where KW will file joint stipulation to lift stay.	0.10	725.00	\$72.50
01/08/19	JM	Review	Review email from DB re motion for preliminary approval	0.10	350.00	\$35.00
01/08/19	JM	Review	Review email from AB re conference call	0.10	350.00	\$35.00
01/08/19	JM	Review	Review email from DB re conference call	0.10	350.00	\$35.00
01/08/19	JM	Review	Review email from AB re conference call	0.10	350.00	\$35.00
01/08/19	DW	Review	AB email re: conference call	0.10	725.00	\$72.50
01/08/19	DW	Review	DB email re: motion for preliminary approval	0.10	725.00	\$72.50
01/09/19	VB	Documents for Court	Reviewed and filed Joint Stip to Lift Stay	0.50	175.00	\$87.50
01/09/19	VB	Documents for Court	Sent chambers copies	0.20	175.00	\$35.00
01/09/19	JK	Review	review AB email re motion for preliminary approval.	0.10	725.00	\$72.50
01/09/19	JK	Review	review email from TMF re status of filing joint stipulation.	0.10	725.00	\$72.50
01/09/19	JK	Review	review ECF re: stipulation to lift case.	0.10	725.00	\$72.50
01/09/19	JM	Review	Review email from CML re draft joint stipulation to lift stay	0.10	350.00	\$35.00
01/09/19	JM	Review	Review email from AB re motion for preliminary approval	0.10	350.00	\$35.00
01/09/19	JM	Review	Review email from TMF re joint stipulation to lift stay	0.10	350.00	\$35.00
01/09/19	JM	Review	Review email from CML re filing joint stipulation to lift stay	0.10	350.00	\$35.00
01/09/19	JM	Review	Review email from DB re filing joint stipulation to lift stay	0.10	350.00	\$35.00
01/09/19	JM	Review	Review ECF Notice email re Joint Stipulation to Lift Stay	0.10	350.00	\$35.00
01/09/19	DW	Review	ECF notice re: stip to lift stay	0.10	0.00 OT	\$0.00
01/09/19	DW	Review	DB email re: joint stip to lift stay	0.10	725.00	\$72.50
01/09/19	DW	Review	CL email re: stip to lift stay	0.10	0.00 OT	\$0.00
01/09/19	DW	Review	TF email re: stip to lift stay	0.10	0.00 OT	\$0.00
01/09/19	DW	Review	AB email re: motion for preliminary approval	0.10	725.00	\$72.50
01/09/19	DW	Review	CL email re: stip to lift stay	0.10	725.00	\$72.50
01/09/19	CL	Legal Services	Analyze emails between our office and co-counsel re review of the Joint Motion to Lift stay in the District Court.	0.40	625.00	\$250.00
01/09/19	CL	Legal Services	Prepare joint motion/stip to lift stay in District Court matter and proposed order.	0.80	625.00	\$500.00
01/09/19	CL	Legal Services	Analyze and respond to emails between counsel for defense re changes to the draft of joint motion/stip to lift stay in district court.	0.40	625.00	\$250.00



Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
01/09/19	CL	Legal Services	Analyze notice from the court confirming Joint Motion/Stip to Lift Stay and Proposed Order were filed with the Court.	0.20	625.00	\$125.00
01/10/19	VB	Documentation	Reviewed and saved docket 50	0.10	175.00	\$17.50
01/10/19	JK	Review	review Order granting joint stipulation to lift stay.	0.10	725.00	\$72.50
01/10/19	JM	Review	Review ECF Notice email re Order Granting Request and Joint Stipulation to Lift Stay	0.10	350.00	\$35.00
01/10/19	DW	Review	ECF notice re: order on stip to lift stay	0.10	725.00	\$72.50
01/11/19	JK	Review	review email from Don Brown re discovery and confidentiality.	0.10	725.00	\$72.50
01/11/19	JK	Review	review email from AB re: discovery.	0.10	725.00	\$72.50
01/11/19	JK	Review	review discovery production.	1.20	725.00	\$870.00
01/11/19	JM	Review	Review CML email re document production	0.10	350.00	\$35.00
01/11/19	JM	Review	Review email from LP re document production	0.10	350.00	\$35.00
01/11/19	DW	Review	LP email re: document production	0.10	725.00	\$72.50
01/11/19	DW	Review	CL email re: document production	0.10	725.00	\$72.50
01/11/19	CL	Legal Services	Analyze email from Defense counsel attaching documents supporting some of the data provided by Tinder pertaining to the settlement for review.	0.50	625.00	\$312.50
01/11/19	CL	Legal Services	Analyze emails with co-counsel discussing handling of data provided by defense counsel pertaining to the settlement.	0.30	625.00	\$187.50
01/16/19	JK	Review	review CML draft of LR 7-3 compliance.	0.20	725.00	\$145.00
01/16/19	JK	Review	review ECF re: LR Rule 7-3 compliance.	0.10	725.00	\$72.50
01/16/19	JM	Review	Review email from CML re draft JPK declaration	0.10	350.00	\$35.00
01/16/19	JM	Review	Review email from CML re conference call	0.10	350.00	\$35.00
01/16/19	DW	Review	CL email re: conference call	0.10	725.00	\$72.50
01/16/19	DW	Review	CL email re: draft JK declaration	0.10	0.00 OT	\$0.00
01/16/19	CL	Legal Services	Analyze emails between co-counsel and defense counsel re further meet and confer on Motion for Preliminary Approval re settlement prior to filing.	0.20	625.00	\$125.00
01/17/19	JM	Review	Review ECF Notice email re Notice re Local Rule 7-3 Conference	0.10	350.00	\$35.00
01/17/19	DW	Review	ECF notice re: local rule 7-3 conference	0.10	725.00	\$72.50
01/17/19	CL	Legal Services	Analyze email between co-counsel and defense counsel regarding meet and confer re compliance statement prior to filing preliminary approval motion.	0.30	625.00	\$187.50
01/17/19	CL	Legal Services	Analyze email from the Court confirming that compliance statement has been filed.	0.10	625.00	\$62.50
01/18/19	JK	Review	review AB edits to JPK declaration.	0.20	725.00	\$145.00
01/18/19	JK	Review	review email re: client signature.	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
01/18/19	JK	Prepare	prepare email accompanying declaration in support of motion for preliminary approval.	0.10	725.00	\$72.50
01/18/19	JK	Review	ECF Motion for Settlement Approval.	0.10	725.00	\$72.50
01/18/19	DW	Review	DB email re: conference call	0.10	725.00	\$72.50
01/18/19	CL	Legal Services	Analyze emails between co-counsel and our office re finalization of the Motion for Preliminary Approval of Settlement, including preparation of declarations and execution of.	1.10	625.00	\$687.50
01/18/19	CL	Legal Services	Prepare and respond to communications with client regarding the review and execution of her declaration in support of motion for preliminary approval of settlement.	0.50	625.00	\$312.50
01/20/19	VB	Documents for Court	Filed, saved, calendared Mx for Class Settlement	0.50	175.00	\$87.50
01/20/19	CL	Legal Services	Analyze email confirming that the Motion for Preliminary Approval of Settlement was filed.	0.10	625.00	\$62.50
01/21/19	JM	Review	Review 1/20 ECF Notice email re Motion for Settlement Approval of Class Action Settlement	0.10	350.00	\$35.00
01/21/19	DW	Review	ECF notice re: motion for preliminary approval	0.10	725.00	\$72.50
01/22/19	CL	Legal Services	Analyze emails between our office and counsel re: status	0.20	625.00	\$125.00
01/24/19	JK	Review	review email from VB re motion for preliminary approval deadlines.	0.10	725.00	\$72.50
01/24/19	JK	Review	review email from Don Briwn and AB re hearing date.	0.10	725.00	\$72.50
01/24/19	JM	Review	Review email from VB re Motion for Preliminary Approval of Class Action Settlement calendaring	0.10	350.00	\$35.00
01/24/19	DW	Review	VB email re: motion for preliminary approval	0.10	725.00	\$72.50
01/30/19	VB	Documentation	Reviewed and saved docket 53	0.10	175.00	\$17.50
01/30/19	JM	Review	Review ECF Notice email re Notice of Non-Opposition to Plaintiff's Motion for Preliminary Approval of Class Action Settlement	0.10	350.00	\$35.00
01/30/19	DW	Review	ECF notice re: notice of non opposition to motion for preliminary approval	0.10	725.00	\$72.50
01/30/19	CL	Legal Services	Analyze notice of non-opposition to motion for preliminary approval of settlement filed by defendants.	0.30	625.00	\$187.50
02/04/19	VB	Documentation	Reviewed and saved docket 54	0.20	175.00	\$35.00
02/04/19	JK	Review	review Opposition papers filed by Candelore plaintiffs.	1.00	725.00	\$725.00
02/04/19	JK	Review	review email from TMF re: standing of Candelore plaintiffs.	0.10	725.00	\$72.50
02/04/19	JK	Review	review AB review of opposition.	0.20	725.00	\$145.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
02/04/19	JM	Review	Review ECF Notice email re Opposition to Plaintiff's Motion for Preliminary Approval of Class Action Settlement	0.10	350.00	\$35.00
02/04/19	JM	Review	Review email from VB re Opposition to Plaintiff's Motion for Preliminary Approval docket entries	0.10	350.00	\$35.00
02/04/19	JM	Review	Review email from CML re Opposition to Plaintiff's Motion for Preliminary Approval of Class Action Settlement	0.10	350.00	\$35.00
02/04/19	DW	Review	CL email re: opposition to motion for preliminary approval	0.10	725.00	\$72.50
02/04/19	DW	Review	VB email re: opposition to motion for preliminary approval	0.10	725.00	\$72.50
02/04/19	DW	Review	ECF email re: opposition to motion for preliminary approval	0.10	725.00	\$72.50
02/04/19	CL	Legal Services	Analyze Candelore's Opposition to Motion for Preliminary Approval of Settlement, with two attached declarations.	0.70	625.00	\$437.50
02/04/19	CL	Legal Services	Analyze emails between co-counsel re thoughts for addressing the opposition filed to Motion for Preliminary Approval of the Settlement, including reading cases circulated re District Court judge's handling of such Motions.	2.10	625.00	\$1,312.50
02/05/19	JK	Phone Call	conference call re briefing.	0.20	725.00	\$145.00
02/05/19	CL	Legal Services	Analyze and respond to additional emails with co-counsel regarding further strategy re addressing reply to opposition to Motion for Preliminary Approval of Settlement.	0.30	625.00	\$187.50
02/07/19	CL	Legal Services	Analyze emails between co-counsel and our office confirming that we are proceeding with an reply to the Candelore opposition to Motion for Preliminary Approval of Settlement.	0.20	625.00	\$125.00
02/08/19	JK	Review	review CML email re Proposed Statement of Decision	0.10	725.00	\$72.50
02/08/19	JK	Review	review TMF email re Proposed Statement of Decision.	0.10	725.00	\$72.50
02/08/19	JK	Review	review email from CML to Don Brown re: Proposed Statement of Decision.	0.10	725.00	\$72.50
02/08/19	JK	Review	review Don Brown email re: Proposed Statement of Decision.	0.10	725.00	\$72.50
02/08/19	JK	Review	review research re: standing of opposing class settlement.	0.20	725.00	\$145.00
02/08/19	JK	Review	review AB email re intervenors.	0.10	725.00	\$72.50
02/08/19	CL	Legal Services	Conduct legal research supporting settlement was reasonable and a product of arms length negotiation with no collusion, to support Reply to Candelore Opposition to Motion for Preliminary Approval of Settlement.	1.70	625.00	\$1,062.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
02/08/19	CL	Legal Services	Prepare initial draft of Reply to Candelore Opposition to Motion for Preliminary Approval of Settlement.	2.70	625.00	\$1,687.50
02/08/19	CL	Legal Services	Analyze and respond to emails with co-counsel discussing the preparation of proposed statement of decision and draft of reply to opposition to Motion for Preliminary Approval of Settlement.	0.60	625.00	\$375.00
02/08/19	CL	Legal Services	Prepare and respond to emails with defense counsel re handling of statement of decision to file with the Court, per Court rules.	0.30	625.00	\$187.50
02/08/19	CL	Legal Services	Conduct legal research supporting that Candelore Opposition to Motion for Preliminary Approval of Settlement is defective procedurally, to assist in preparation of Reply.	2.30	625.00	\$1,437.50
02/10/19	JK	Review	review email re deadline for appellate brief.	0.10	725.00	\$72.50
02/10/19	JK	Review	review email from CML re appeal procedure.	0.10	725.00	\$72.50
02/10/19	JK	Review	review email from AB to Don Brown re: motion.	0.10	725.00	\$72.50
02/10/19	JK	Review	review email from Don Brown re motion.	0.10	725.00	\$72.50
02/10/19	JK	Review	review reply draft.	0.50	725.00	\$362.50
02/10/19	JK	Review	review AB email to defense counsel re: Reply.	0.20	725.00	\$145.00
02/10/19	JK	Review	review Joint Proposed Statement of decision.	0.20	725.00	\$145.00
02/10/19	CL	Legal Services	Complete preparation of initial draft of Reply to Candelore Opposition to Motion for Preliminary Approval of Settlement.	6.10	625.00	\$3,812.50
02/10/19	CL	Legal Services	Analyze emails between plaintiff and defense counsel discussing content of Reply to Candelore Opposition to Motion for Preliminary Approval of Settlement.	0.40	625.00	\$250.00
02/10/19	CL	Legal Services	Analyze and respond to emails with co-counsel re coordination of work to complete Reply to Candelore Opposition to Motion for Preliminary Approval of Settlement.	0.30	625.00	\$187.50
02/11/19	JM	Review	Review Plaintiff's Reply to Opposition to Motion for Preliminary Approval	0.80	350.00	\$280.00
02/11/19	JM	Review	Finalize and prepare for filing Plaintiff's Reply to Opposition to Motion for Preliminary Approval	0.60	350.00	\$210.00
02/11/19	VB	Documents for Court	Filed Motion in 9th circuit	0.50	175.00	\$87.50
02/11/19	VB	Documentation	Reviewed and saved docket 55	0.10	175.00	\$17.50
02/11/19	VB	Documents for Court	Filed Reply to Motion and sent chambers copies	0.50	175.00	\$87.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
02/11/19	VB	Documents for Court	Filed Notice of Errata and sent chambers copies	0.50	175.00	\$87.50
02/11/19	JK	Review	review email from Don Brown re: Reply.	0.10	725.00	\$72.50
02/11/19	JK	Review	review email from AB to Don Brown re: Reply.	0.10	725.00	\$72.50
02/11/19	JK	Review	review email from CML re: service on "purported" intervenors.	0.10	725.00	\$72.50
02/11/19	JK	Review	review email from AB re: motion for extension in 9th Cir.	0.10	725.00	\$72.50
02/11/19	JK	Review	review Tinder position on Reply.	0.20	725.00	\$145.00
02/11/19	JK	Review	review stipulation for extension on deadlines.	0.10	725.00	\$72.50
02/11/19	JK	Review	review CML email to Don Brown re: extension in 9th Cir.	0.10	725.00	\$72.50
02/11/19	JK	Review	review draft of Reply.	0.30	725.00	\$217.50
02/11/19	JK	Review	review ECF from Joint Motion.	0.10	725.00	\$72.50
02/11/19	JK	Review	review ECF from Tinder Reply	0.10	725.00	\$72.50
02/11/19	JM	Review	Review email from CML re draft Reply to Opposition to Plaintiff's Motion for Preliminary Approval of Class Action Settlement	0.10	350.00	\$35.00
02/11/19	JM	Review	Review email from JPK re draft Reply to Opposition to Plaintiff's Motion for Preliminary Approval	0.10	350.00	\$35.00
02/11/19	JM	Review	Review email from CML re draft Stipulation re Further Extension of Briefing Deadlines filing	0.10	350.00	\$35.00
02/11/19	JM	Review	Review email from VB re draft Stipulation re Further Extension of Briefing Deadlines filing	0.10	350.00	\$35.00
02/11/19	JM	Review	Review ECF Notice email re Declaration of Joseph Ciesla in support of Motion for Preliminary Approval of Class Action Settlement	0.10	350.00	\$35.00
02/11/19	JM	Review	Review ECF Notice email re Reply re Motion for Preliminary Approval of Class Action Settlement	0.10	350.00	\$35.00
02/11/19	JM	Review	Review email from AB re draft Reply re Motion for Preliminary Approval of Class Action Settlement	0.10	350.00	\$35.00
02/11/19	JM	Review	Review email from CML re notice of errata re Reply re Motion for Preliminary Approval of Class Action Settlement	0.10	350.00	\$35.00
02/11/19	JM	Review	Review email from AB re corrected Reply re Motion for Preliminary Approval of Class Action Settlement	0.10	350.00	\$35.00
02/11/19	JM	Review	Review ECF Notice email re Notice of Errata re Reply re Motion for Preliminary Approval of Class Action Settlement	0.10	350.00	\$35.00
02/11/19	DW	Review	ECF notice re: reply to motion for preliminary approval	0.10	0.00 OT	\$0.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
02/11/19	DW	Review	ECF notice re: declaration of Ciesla in support of motion for preliminary approval	0.10	725.00	\$72.50
02/11/19	DW	Review	VB email re: draft stip to extend briefing deadlines	0.10	725.00	\$72.50
02/11/19	DW	Review	CL email re: stip for extension of briefing deadlines	0.10	725.00	\$72.50
02/11/19	DW	Review	JK email re: draft reply to opposition to motion for preliminary approval	0.10	725.00	\$72.50
02/11/19	DW	Review	CL email re: draft reply to opposition to motion for preliminary approval	0.10	725.00	\$72.50
02/11/19	DW	Review	and edit reply to opposition to motion for preliminary approval	0.50	725.00	\$362.50
02/11/19	CL	Legal Services	Analyze emails between plaintiff and defense counsel re additional input for Reply to Candelore Opposition to Motion for Preliminary Approval of Settlement.	0.80	625.00	\$500.00
02/11/19	CL	Legal Services	Prepare and respond to emails with co-counsel re additional changes to the Reply to Candelore Opposition to Motion for Preliminary Approval of Settlement and coordination re filing of Reply.	1.60	625.00	\$1,000.00
02/11/19	CL	Legal Services	Further review and prepare Reply to Candelore Opposition to Motion for Preliminary Approval of Settlement based on input of co-counsel and defense counsel.	1.70	625.00	\$1,062.50
02/11/19	CL	Legal Services	Prepare notice of errata re Reply to Candelore Opposition to Motion for Preliminary Approval of Settlement.	0.40	625.00	\$250.00
02/11/19	CL	Legal Services	Telephone conversation with co-counsel Adrian Bacon to discuss issue with filing of Reply to Candelore Opposition to Motion for Preliminary Approval of Settlement and preparation of Errata.	0.30	625.00	\$187.50
02/11/19	CL	Legal Services	Prepare stipulation for further extension of briefing deadlines in appeals court.	0.40	625.00	\$250.00
02/11/19	CL	Legal Services	Prepare and respond to emails with co-counsel re review of stipulation re further extension of briefing deadlines prior to sending to defense counsel for review.	0.20	625.00	\$125.00
02/11/19	CL	Legal Services	Analyze and respond to emails with defense counsel and co-counsel re revisions to the proposed stipulation to request court of appeal for further extension to briefing deadline.	0.40	625.00	\$250.00
02/11/19	CL	Legal Services	Further prepare revisions to joint motion to request court of appeal for further extension to deadlines for appellate briefing.	0.40	625.00	\$250.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
02/11/19	CL	Legal Services	Analyze receipt of email from court of appeal confirming joint stipulation to extend appellate briefing was filed with the court.	0.10	625.00	\$62.50
02/11/19	CL	Legal Services	Analyze declaration of Joseph Ciesla of Tinder filed in support of Motion for Approval of Preliminary Settlement, providing additional information for consideration.	0.40	625.00	\$250.00
02/11/19	CL	Legal Services	Analyze email from the Court confirming filing of Reply to Candelore Opposition to Motion for Preliminary Approval of Settlement.	0.10	625.00	\$62.50
02/11/19	CL	Legal Services	Analyze email from the Court confirming filing of Notice of Errata to Reply to Candelore Opposition to Motion for Preliminary Approval of Settlement.	0.10	625.00	\$62.50
02/11/19	DW	Review	ECF notice re: errata re: reply for motion for preliminary approval	0.10	725.00	\$72.50
02/11/19	DW	Review	AB email re: corrected reply re: motion for preliminary approval	0.10	0.00 OT	\$0.00
02/11/19	DW	Review	CL email re: notice of errata re: reply to motion for preliminary approval	0.10	725.00	\$72.50
02/11/19	DW	Review	AB email re: draft reply to motion for preliminary approval	0.10	725.00	\$72.50
02/12/19	VB	Documentation	Calendared new brief deadlines	0.15	175.00	\$26.25
02/12/19	JK	Review	review order granting extension.	0.10	725.00	\$72.50
02/12/19	JM	Review	Review email from CML re extended appellate briefing deadlines	0.10	350.00	\$35.00
02/12/19	JM	Review	Review email from VB re extended appellate briefing deadlines	0.10	350.00	\$35.00
02/12/19	DW	Review	VB email re: extension of appeal brief	0.10	0.00 OT	\$0.00
02/12/19	DW	Review	CL email re: extension of appeal deadlines	0.10	725.00	\$72.50
02/13/19	CL	Legal Services	Analyze Court of Appeal's order granting our request for extension to briefing deadlines.	0.10	625.00	\$62.50
02/13/19	CL	Legal Services	Analyze email from co-counsel with comment on Court of Appeal's grant of our request to continue briefing deadline.	0.10	625.00	\$62.50
02/13/19	CL	Legal Services	Prepare joint proposed statement of decision.	2.30	625.00	\$1,437.50
02/13/19	CL	Legal Services	Analyze and respond to emails with counsel for defense regarding his review and proposed changes to the proposed statement of decision.	0.50	625.00	\$312.50
02/13/19	CL	Legal Services	Prepare further revisions to proposed statement of decision based on comments of co-counsel and defense counsel.	0.50	625.00	\$312.50
02/13/19	VB	Documents for Court	Reviewed and filed Proposed Statement of Decision, and sent courtesy copies	0.75	175.00	\$131.25
02/13/19	JK	Review	review proposed joint statement and order.	0.10	725.00	\$72.50



Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
02/13/19	JK	Review	review ECF for Notice of Lodging Joint Statement.	0.10	725.00	\$72.50
02/13/19	JM	Review	Review email from CML re draft Joint Proposed Statement of Decision	0.10	350.00	\$35.00
02/13/19	JM	Review	Review email from DB re draft Joint Proposed Statement of Decision	0.10	350.00	\$35.00
02/13/19	JM	Review	Review email from CR re draft Joint Proposed Statement of Decision	0.10	350.00	\$35.00
02/13/19	JM	Review	Review email from CR re Plaintiff's Proposed Statement of Decision	0.10	350.00	\$35.00
02/13/19	JM	Review	Review email from AB re Plaintiff's Proposed Statement of Decision	0.10	350.00	\$35.00
02/13/19	JM	Review	Review email from CR re edits to Proposed Statement of Decision	0.10	350.00	\$35.00
02/13/19	JM	Review	Review email from CML re revisions to Proposed Statement of Decision	0.10	350.00	\$35.00
02/13/19	JM	Review	Review ECF Notice email re Notice of Lodging of Proposed Statement of Decision	0.10	350.00	\$35.00
02/13/19	DW	Review	ECF email re: lodging of statement of decision	0.10	0.00 OT	\$0.00
02/13/19	DW	Review	CML email re: revision to proposed statement of decision	0.10	0.00 OT	\$0.00
02/13/19	DW	Review	CR email re: edits to proposed statement of decision	0.10	0.00 OT	\$0.00
02/13/19	DW	Review	AB email re: proposed statement of decision	0.10	725.00	\$72.50
02/13/19	DW	Review	CR email re: proposed statement of decision	0.10	725.00	\$72.50
02/13/19	DW	Review	CR email re: draft joint proposed statement of decision	0.10	725.00	\$72.50
02/13/19	DW	Review	DB email re: draft joint proposed statement of decision	0.10	725.00	\$72.50
02/13/19	DW	Review	CL email re: draft joint proposed statement of decision	0.10	0.00 OT	\$0.00
02/21/19	CL	Legal Services	Analyze minute order from the Court indicating Court is taking case under submission on issue of Motion for Preliminary Approval of Class Settlement.	0.10	625.00	\$62.50
02/21/19	CL	Legal Services	Analyse email from co-counsel with comments on Court's minute order taking Motion for Preliminary Approval of Settlement under submission.	0.10	625.00	\$62.50
02/21/19	VB	Documentation	Reviewed, saved, calendared Dockets 59 and 60	0.50	175.00	\$87.50
02/21/19	JK	Review	review ECF taking hearing off and takign motion under submission.	0.10	725.00	\$72.50
02/21/19	JK	Review	review AB email re: Motion under submission.	0.10	725.00	\$72.50
02/21/19	JK	Review	review email from TMF re: hearing being taken under submission.	0.10	725.00	\$72.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
02/21/19	JM	Review	Review ECF Notice email re Minute Order taking Plaintiff's Motion for Preliminary Approval of Class Action Settlement under submission	0.10	350.00	\$35.00
02/21/19	JM	Review	Review email from VB re hearing on Plaintiff's Motion for Preliminary Approval off calendar	0.10	350.00	\$35.00
02/21/19	DW	Review	VB email re: preliminary approval motion hearing off calendar	0.10	0.00 OT	\$0.00
02/21/19	DW	Review	ECF notice re: preliminary approval motion under submission	0.10	725.00	\$72.50
02/28/19	CL	Legal Services	Analyze and respond to emails with co-counsel re handling of the completion of joint report to district court re status of matter.	0.30	625.00	\$187.50
02/28/19	JK	Review	review email from CML re: status report.	0.10	725.00	\$72.50
02/28/19	JK	Review	review email from AB re status report.	0.10	725.00	\$72.50
02/28/19	JM	Review	Review email from CML re Joint Status Report	0.10	350.00	\$35.00
02/28/19	JM	Review	Review email from AB re Joint Status Report	0.10	350.00	\$35.00
02/28/19	JM	Review	Review email from CML response re draft Joint Status Report	0.10	350.00	\$35.00
02/28/19	DW	Review	CL email re: joint status report	0.10	725.00	\$72.50
02/28/19	DW	Review	AB email re: joint status report	0.10	725.00	\$72.50
03/01/19	CL	Legal Services	Analysis of Court's minute order granting Motion for Preliminary Approval of Settlement with request that revised proposed notice is prepared.	0.50	625.00	\$312.50
03/01/19	CL	Legal Services	Analyze and respond to emails with co-counsel regarding the analysis of the Court's grant of Motion for Preliminary Approval of Settlement.	1.10	625.00	\$687.50
03/01/19	JK	Review	review Order on Motion for Settlement.	0.50	725.00	\$362.50
03/01/19	JK	Review	review email from TMF re motion for fees.	0.10	725.00	\$72.50
03/01/19	JM	Review	Review ECF Notice email re Minute Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement	0.10	350.00	\$35.00
03/01/19	JM	Review	Review email from VB re Minute Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement	0.10	350.00	\$35.00
03/01/19	DW	Review	Email from VB re: minute order granting motion for preliminary approval	0.10	725.00	\$72.50
03/01/19	DW	Review	ECF email re: order granting motion for preliminary approval	0.10	725.00	\$72.50
03/05/19	CL	Legal Services	Prepare joint statement re case status.	0.60	625.00	\$375.00
03/05/19	CL	Legal Services	Send email to co-counsel with draft joint statement of case status for review prior to sending it to defense counsel.	0.10	625.00	\$62.50
03/05/19	JM	Review	Review email from CML re draft Joint Status Report	0.10	350.00	\$35.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
03/05/19	DW	Review	Email from CL re: joint status report	0.10	0.00 OT	\$0.00
03/06/19	CL	Legal Services	Analyze emails between co-counsel and defense counsel re changes to the proposed order granting motion for preliminary approval of settlement, and the notice contained within, per court's order.	0.60	625.00	\$375.00
03/06/19	JK	Review	review proposed order granting preliminary approval.	0.30	725.00	\$217.50
03/06/19	JK	Review	review email from AB to Don Brown re proposed order re preliminary approval.	0.10	725.00	\$72.50
03/07/19	CL	Legal Services	Analyze additional emails between co-counsel and defense counsel re changes to the proposed order granting motion for preliminary approval of settlement, and the notice contained within, per court's order.	0.30	625.00	\$187.50
03/08/19	JM	Review	Review revised proposed Notice and proposed Order Granting Motion for Preliminary Approval	0.90	350.00	\$315.00
03/08/19	JM	Review	Finalize and prepare for filing proposed Notice and proposed Order Granting Motion for Preliminary Approval	0.70	350.00	\$245.00
03/08/19	CL	Legal Services	Analyze emails between co-counsel, our office and defense counsel re finalization of the revised proposed order and class notice.	1.10	625.00	\$687.50
03/08/19	VB	Documents for Court	Filed Declaration and sent chambers copies	0.50	175.00	\$87.50
03/08/19	JK	Review	review JAM email re Joint Status Report.	0.10	725.00	\$72.50
03/08/19	JK	Prepare	Prepare Declaration re Order for Settlement and accompanying documents.	0.60	725.00	\$435.00
03/08/19	JM	Draft	Draft email to AB and TMF re proposed Notice and Order Granting Motion for Preliminary Approval of Class Action Settlement	0.10	350.00	\$35.00
03/08/19	JM	Review	Review ECF Notice email re JPK Declaration	0.10	350.00	\$35.00
03/08/19	DW	Review	ECF e-mail re: JPK declaration	0.10	725.00	\$72.50
03/08/19	DW	Review	JM email to AB and TMF re: proposed order granting motion for preliminary approval	0.10	0.00 OT	\$0.00
03/08/19	DW	Review	Proposed order re: motion for preliminary approval	0.10	725.00	\$72.50
03/11/19	CL	Legal Services	Analyze email from defense counsel with questions to clarify settlement administration.	0.20	625.00	\$125.00
03/11/19	JK	Review	review email from Don Brown re: website name for settlement.	0.10	725.00	\$72.50
03/12/19	CL	Legal Services	Analyze Court's final approval of Motion for Preliminary Approval of Class Settlement.	0.50	625.00	\$312.50

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
03/12/19	CL	Legal Services	Analyze additional emails between co-counsel, our office and defense counsel re discussion of settlement administration now that court has preliminarily approved class settlement.	0.30	625.00	\$187.50
03/12/19	VB	Documentation	Reviewed, saved, calendared Docket 62	0.50	175.00	\$87.50
03/12/19	JK	Review	review ECF and Order.	0.10	725.00	\$72.50
03/12/19	JK	Review	review email from AB to class administrator.	0.10	725.00	\$72.50
03/12/19	JM	Review	Review ECF Notice email re Order Granting Motion for Preliminary Approval of Class Action Settlement	0.10	350.00	\$35.00
03/12/19	DW	Review	ECF e-mail re: order granting motion for preliminary approval	0.10	725.00	\$72.50
03/13/19	JM	Review	Review email from VB re Order deadlines	0.10	350.00	\$35.00
03/13/19	DW	Review	Email from VB re: order deadlines	0.10	0.00 OT	\$0.00
03/18/19	CL	Legal Services	Analyze emails from between Plaintiff and Defense counsel re issues brought up with Epiq's set up of the administration of the class settlement.	0.30	625.00	\$187.50
03/26/19	CL	Legal Services	Analyze emails between Plaintiff and Defense counsel re review and approval of changes to the Notice and Claim form for settlement administration.	0.30	625.00	\$187.50
03/26/19	JK	Review	review notice and claim form.	0.20	725.00	\$145.00
03/27/19	CL	Legal Services	Analyze additional emails between Plaintiff and Defense counsel re review and approval of changes to the Notice and Claim form for settlement administration.	0.20	625.00	\$125.00
04/01/19	CL	Legal Services	Analyze emails between co-counsel, our office, defense counsel and Epiq, settlement administrators, re introduction and discussion re handling of settlement.	0.50	625.00	\$312.50
04/01/19	CL	Legal Services	Analyze emails between co-counsel, our office, and defense counsel re clarification on questions from Epiq re settlement administration.	0.50	625.00	\$312.50
04/02/19	CL	Legal Services	Analyze emails between counsel for defense regarding proposed IVR script for administration of settlement, with proposed IVR script attached.	0.40	625.00	\$250.00
04/02/19	JK	Review	review email from Don Brown re: Notice.	0.10	725.00	\$72.50
04/02/19	JK	Review	review IVR script.	0.10	725.00	\$72.50
04/03/19	CL	Legal Services	Analyze emails between counsel for defense and plaintiff addressing the proposed IVR script for administration of settlement, with proposed IVR script attached.	0.20	625.00	\$125.00

Date	By	Type	Service Summary	Hours/Qty	Rate	Amount
04/03/19	CL	Legal Services	Analyze emails between counsel for defense and plaintiff addressing the settlement website for the administration of settlement.	0.20	625.00	\$125.00
04/04/19	CL	Legal Services	Analyze and respond to emails with co-counsel re coordination of work and content for Motion for Attorney fees.	0.50	625.00	\$312.50
04/08/19	CL	Legal Services	Analyze and respond to additional emails with co-counsel re coordination of work and content for Motion for Attorney fees.	0.40	625.00	\$250.00
04/08/19	VB	Correspondence	Circulated dial-in for conference call	0.10	175.00	\$17.50
04/11/19	CL	Legal Services	Telephone call with co-counsel Adrian Bacon and John Kristensen re coordination of work and content for Motion for Attorney fees.	0.40	625.00	\$250.00
04/17/19	CL	Legal Services	Begin draft declaration of John P. Kristensen in support of Motion for Attorneys' Fees & Incentive Award.	0.70	625.00	\$437.50
04/17/19	CL	Legal Services	Analyze and respond to emails with co-counsel to confirms specifics to include in our declarations in support of Motion for Attorneys' Fees and Incentive Award.	0.40	625.00	\$250.00
04/18/19	VB	Research	Checked brief deadlines for attorneys	0.10	175.00	\$17.50
04/18/19	CL	Legal Services	Complete preparation of draft declaration of John P. Kristensen in support of Motion for Attorneys' Fees and Incentive Award.	3.20	625.00	\$2,000.00
04/18/19	CL	Legal Services	Complete preparation of draft declaration of Christina M. Le in support of Motion for Attorneys' Fees and Incentive Award.	0.70	625.00	\$437.50
04/18/19	JK	Prepare	Prepare edits to declaration and motion for fees.	2.10	725.00	\$1,522.50
04/18/19	JK	Meeting	Meeting with CML re: Motion for Fees.	0.40	725.00	\$290.00
04/19/19	JK	Prepare	Prepare edits to declaration and motion for fees.	1.20	725.00	\$870.00
04/19/19	JK	Prepare	Prepare edits to declaration and motion for fees.	4.50	725.00	\$3,262.50
04/19/19	JK	Prepare	Prepare edits to declaration and motion for fees.	4.20	725.00	\$3,045.00
04/21/19	VB	Documents for Court	Filed 9th Circuit Admittance	0.25	175.00	\$43.75
04/21/19	VB	Documents for Court	Researched and Prepped Application for 9th Circuit	1.00	175.00	\$175.00

Total Hours:	328.75
Total Labor:	198,716.25
<b>Total Invoice Amount:</b>	<b>\$198,716.25</b>
<b>Total Amount Due:</b>	<b>\$198,716.25</b>

# **EXHIBIT “2”**

**Kristensen Weisberg, LLP**  
 12540 Beatrice Street, # 200  
 Los Angeles, CA 90066  
 (310) 507-7924  
 www.kristensenlaw.com

**Invoice**



BILL TO
Kim v. Tinder

INVOICE #	DATE	TOTAL DUE	DUE DATE	TERMS	ENCLOSED
753	04/05/2019	\$6,589.96	05/05/2019	Net 30	

DATE	ACTIVITY	QTY	RATE	AMOUNT
04/13/2018	COURTS/USDC-CA-C 461LOS ANGELES CA			400.00
04/19/2018	IN *LEGAL DOCUMENT MDALLAS TX			225.00
04/24/2018	Court Filing			75.60
05/08/2018	Pacer Ir PACER800-676-6856IR SAN ANTONIO TX			7.90
05/15/2018	70762-01			14.10
05/30/2018	Certified Letter to Match Group Inc.			6.30
05/30/2018	Certified Letter to Match Group LLC			6.30
05/30/2018	Certified Letter to Tinder Inc.			6.30
05/31/2018	73421-01			154.10
07/13/2018	Pacer Charges - July 2018 Quarterly Invoice			9.40
07/15/2018	77065-01			152.85
07/15/2018	77204-01			27.50
07/15/2018	78044-01			40.00
10/12/2018	50% of Plaintiff's portion paid by Todd Friedman			-4,725.00
10/12/2018	Admin Fee			450.00
10/12/2018	50% Full Mediation Fee			9,000.00
11/22/2018	U.S. COURT OF APPEA SAN FRANCISCO CA			230.00
11/30/2018	ABM US BANK TOWER 25LOS ANGELES CA			15.00
11/30/2018	Deadlines Demand DEADLINES ON DEMAND LOS ANGELES CA			10.00
12/31/2018	Deadlines Demand DEADLINES ON DEMAND LOS ANGELES CA			10.00
01/24/2019	Joint Stipulation			32.06
01/31/2019	Deadlines Demand DEADLINES ON DEMAND LOS ANGELES CA			10.00
01/31/2019	Deadlines Demand DEADLINES ON DEMAND			10.00



DATE	ACTIVITY	QTY	RATE	AMOUNT
02/07/2019	LOS ANGELES CA Pacer Ir PACER800-676-6856IR SAN ANTONIO TX			11.20
02/22/2019	Chamber Copy: Objection and Reply			88.69
02/22/2019	Chamber Copy (2/11/19)			88.69
02/22/2019	Filing - Doc. #58			36.31
03/02/2019	Deadlines Demand DEADLINES ON DEMAND LOS ANGELES CA			10.00
03/02/2019	Deadlines Demand DEADLINES ON DEMAND LOS ANGELES CA			10.00
03/21/2019	Courtesy Copy - Declaration			37.06
03/31/2019	Deadlines Demand DEADLINES ON DEMAND LOS ANGELES CA			10.00
03/31/2019	Deadlines Demand DEADLINES ON DEMAND LOS ANGELES CA			10.00
04/05/2019	603 pages @ \$0.20/page			120.60

BALANCE DUE

**\$6,589.96**

1 John P. Kristensen (SBN 224132)  
2 David L. Weisberg (SBN 211675)  
3 Christina M. Le (SBN 237697)  
4 **KRISTENSEN WEISBERG, LLP**  
5 12450 Beatrice Street, Suite 200  
6 Los Angeles, California 90066  
7 Telephone: 310-507-7924  
8 Fax: 310-507-7906  
9 john@kristensenlaw.com  
10 david@kristensenlaw.com  
11 christina@kristensenlaw.com

12 Todd M. Friedman (SBN 216752)  
13 Adrian R. Bacon (SBN 280332)  
14 **LAW OFFICES OF TODD M. FRIEDMAN, P.C.**  
15 21550 Oxnard Street, Suite 780  
16 Woodland Hills, CA 91367  
17 Telephone: (216) 220-6496  
18 Facsimile: (866) 633-0028  
19 tfriedman@attorneysforconsumers.com  
20 abacon@attorneysforconsumers.com

21 *Attorneys for Plaintiff and all others similarly situated*

22 UNITED STATES DISTRICT COURT  
23 CENTRAL DISTRICT OF CALIFORNIA

24 LISA KIM, individually and on behalf  
25 of all others similarly situated,

26 Plaintiff,

27 vs.

28 TINDER, INC., a Delaware  
corporation; MATCH GROUP, LLC,  
a Delaware limited liability company;  
MATCH GROUP, INC., a Delaware  
corporation; and DOES 1 through 10,  
inclusive, and each of them,

Defendants.

Case No. CV 18-03093 JFW (AS)

Hon. John F. Walter

**[PROPOSED] ORDER GRANTING  
MOTION FOR ATTORNEYS'  
FEES, COSTS AND INCENTIVE  
AWARD**

Hearing Date: June 17, 2019  
Hearing Time: 1:30 p.m.  
Courtroom: 7A

1 Plaintiff Lisa Kim (“Plaintiff”) has moved the Court for attorneys’ fees and  
2 costs, and a class representative incentive award as set forth in the Class Action  
3 Settlement Agreement filed with the Court on January 20, 2019 (Dkt. No. 52-1 Ex  
4 A) (“Agreement”).

5 Having considered all matters submitted to it at the hearing on the motion and  
6 otherwise, including the complete record of this action, and good cause appearing  
7 therefore, the Court hereby finds and concludes as follows:

- 8 1. In addition to any recovery that Plaintiff may receive under the Settlement, and  
9 in recognition of the Plaintiff’s efforts and risks taken on behalf of the  
10 Settlement Class, the Court hereby approves the payment of an incentive  
11 award to the Plaintiff Lisa Kim, in the amount of \$5,000.
- 12 2. The Court approves the payment of attorneys’ fees to Class Counsel in the sum  
13 of \$1,200,000, and the reimbursement of litigation expenses in the sum of  
14 \$12,137.51. The Court finds these fees were reasonably incurred, and that the  
15 hourly rates sought by counsel are reasonable.
- 16 3. This Court shall retain jurisdiction with respect to all matters related to the  
17 administration and consummation of the settlement, and any and all claims,  
18 asserted in, arising out of, or related to the subject matter of the lawsuit,  
19 including but not limited to all matters related to the Settlement and the  
20 determination of all controversies related thereto.

21 **IT IS SO ORDERED.**

22  
23 Dated: \_\_\_\_\_, 2019

\_\_\_\_\_  
24 Honorable John F. Walter  
25 United States District Court Judge  
26  
27  
28