

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

BLAIR DOUGLASS, on behalf of himself
and all similarly situated individuals,

Plaintiff,

v.

P.C. RICHARD & SON, LLC,

Defendant.

Civil Action No. 2:22-cv-00399-MPK

DECLARATION OF KEVIN TUCKER

I, Kevin Tucker, under penalty of perjury under the laws of the United States of America, affirm and state as follows:

1. I have personal knowledge as to all matters set forth in this declaration and could testify to the same if called to do so.

2. I am a co-founder of East End Trial Group LLC and work as an attorney for the firm. I am a consumer and civil rights attorney experienced in prosecuting actions under federal and state consumer protection and anti-discrimination statutes. I am a graduate of the University of Michigan with degrees in English and Anthropology, and of the University of Pittsburgh School of Law, for which I serve as Vice President of its Alumni Board of Governors. My resume was previously filed in this case. (*See* Doc. 31-3.)

3. I am a member in good standing of the Pennsylvania bar. I am admitted to practice before the Third and Ninth Circuit Courts of Appeals and before the following federal courts: the Eastern, Middle, and Western Districts of Pennsylvania, the Northern and Western Districts of New York, the Northern District of Illinois, and the Eastern District of Michigan.

4. In 2023, I received the Young Alumni Award from the University of Pittsburgh School of Law for my contributions in cases concerning consumer protection, cybersecurity and privacy, and the Americans with Disabilities Act.

5. I previously chaired the Allegheny County Bar Association's Civil Rights Litigation Committee.

6. Before founding East End Trial Group, I was a partner at Carlson Lynch LLP, a national plaintiffs-side class action law firm based in Pittsburgh, PA. The Legal Intelligencer named Carlson Lynch the Litigation Department of the Year in 2019 for work the firm did while I was a member of the Carlson Lynch team.

7. Since 2016, I have helped prosecute actions on behalf of consumers.

8. This work includes serving as a committee member representing plaintiffs in *In Re: Philips Recalled CPAP, Bi-Level PAP, and Mechanical Ventilator Products Litigation*, MDL 3014, Doc. 395 (W.D. Pa.) ("*Philips*"); *In Re FedLoan Student Loan Servicing Litigation*, MDL 2833 (E.D. Pa.) ("*FedLoan*"); and *In Re Equifax, Inc. Customer Data Security Breach Litigation*, MDL 2800 (N.D. Ga.) ("*Equifax*").

9. In *Philips*, Judge Conti of the Western District of Pennsylvania appointed me to Plaintiffs' Leadership Development Committee ("LDC"). Following this appointment, the LDC elected me to serve as its Co-Chair, tasked with ensuring LDC members receive opportunities to materially contribute to the prosecution of the MDL.

10. In *FedLoan*, I served as a committee member for the leadership team prosecuting claims against the United States Department of Education and one of the country's largest student loan servicers on behalf of a putative nationwide class of student loan borrowers. This committee work included investigating the factual backgrounds of putative class representatives, identifying

the common policies and practices by which they were harmed, and drafting the consolidated complaint's allegations from this information.

11. In *Equifax*, I served as a committee member for a leadership team that secured a \$30 million recovery for a putative class of financial institutions for injuries they suffered as a result of a 2017 data breach. See Unopposed Motion for Settlement, *In Re Equifax, Inc. Customer Data Security Breach Litigation*, MDL 2800, ECF 1107 (N.D. Ga. May 15, 2020). My contributions centered on research into third-party information sources, including document requests for public filings, congressional testimony, and independent news coverage.

12. In addition to litigating class actions generally, I have litigated Title III digital accessibility claims since 2016, helping to secure landmark decisions across the country confirming public accommodations have a legal obligation to make digital content fully and equally accessible to everyone. See, e.g., *Gniewkowski v. Lettuce Entertain You Enters., Inc.*, 251 F. Supp. 3d 908 (W.D. Pa. 2017); *Access Now, Inc. v. Otter Prods., LLC*, 280 F. Supp. 3d 287 (D. Mass. 2017); *Access Now, Inc. v. Blue Apron, LLC*, No. 17-cv-00116, 2017 U.S. Dist. LEXIS 185112 (D.N.H. Nov. 8, 2017); *Gathers v. 1-800-Flowers.com, Inc.*, No. 17-cv-10273, 2018 U.S. Dist. LEXIS 22230 (D. Mass. Feb. 12, 2018); *Access Now, Inc. v. Sportswear, Inc.*, 298 F. Supp. 3d 296 (D. Mass. 2018); *Murphy v. Bob Cochran Motors, Inc.*, No. 1:19-cv-00239, 2020 U.S. Dist. LEXIS 139887 (W.D. Pa. Aug. 4, 2020), *adopted by, motion denied by, objection overruled by* 2020 U.S. Dist. LEXIS 177593 (W.D. Pa. Sept. 28, 2020).

13. More recently, I have been appointed class counsel in several Title III class actions concerning digital accessibility. See *Douglass v. Mondelez Global, LLC*, No. 2:22-cv-875, Doc. 16 (W.D. Pa. Apr. 13, 2023) (Hardy, J.), *Murphy v. Le Sportsac, Inc.*, No. 1:22-cv-58, Doc. 45 (W.D. Pa. Jan. 24, 2023) (Lanzillo, J.), *Douglass v. Optavia LLC*, No. 2:22-cv-00594, Doc. 38, p.

3 (W.D. Pa. Jan. 23, 2023) (Wiegand, J.); *Murphy v. The Hundreds Is Huge, Inc.*, No. 1:21-cv-00204, Doc. 41, p. 3 (W.D. Pa. Nov. 17, 2022) (Lanzillo, J.); *Giannaros v. Poly-Wood, LLC*, No. 1:21-cv-10351, Doc. 45, p. 2 (D. Mass. Oct. 27, 2022) (Young, J.); *Murphy v. Charles Tyrwhitt, Inc.*, No. 1:20-cv-00056, Doc. 47, p. 3 (W.D. Pa. Feb. 16, 2022) (Baxter, J.); and *Murphy v. Eyebobs, LLC*, No. 1:21-cv-00017, Doc. 49, p. 3 (W.D. Pa. Feb. 9, 2022) (Lanzillo, J.).

OVERVIEW OF EFFORTS ON BEHALF OF PLAINTIFF AND THE CLASS

14. Class Counsel have pursued this case on behalf of Plaintiff since March 2020, when Plaintiff engaged Class Counsel to bring discrimination claims against Defendant for its inaccessible online store. Since the start of his involvement, Plaintiff has been an exemplary class representative. He has provided Class Counsel with information concerning the access and communication barriers he encountered upon browsing Defendant's online store, reviewed pleadings, reviewed the proposed settlements terms, and approved the Agreement submitted to the Court. (Doc. 31-1.) He is aware of his duties as a class representative and has performed them adequately and in a timely manner.

15. Class Counsel have not been compensated for the work performed on this case, which has required Class Counsel to spend substantial time on this litigation that could have been spent on other matters. The work performed by Class Counsel in this case includes, but is not limited to the following:

(a) Class Counsel completed multiple investigations into the accessibility of Defendant's online store to consumers who use VoiceOver on iPhone and other Apple devices to access digital content. "VoiceOver is an industry-leading screen reader that tells you exactly what's happening on your device." *Accessibility, Apple*, <https://www.apple.com/accessibility/vision/> (last visited June 1, 2023).

(b) Class Counsel investigated the accessibility of Defendant’s online store to consumers who use JAWS to access digital content from computers. “JAWS, Job Access With Speech, is the world’s most popular screen reader, developed for computer users whose vision loss prevents them from seeing screen content or navigating with a mouse. JAWS provides speech and Braille output for the most popular computer applications on your PC. You will be able to navigate the Internet, write a document, read an email and create presentations from your office, remote desktop, or from home.” JAWS®, Freedom Scientific, <https://www.freedomscientific.com/products/software/jaws/> (last visited June 1, 2023).

(c) Class Counsel drafted the Nationwide Class Action Complaint. (Doc. 1.)

(d) Class Counsel successfully moved for preliminary class certification on behalf of “a national class of individuals who are Blind and/or who have a Visual Disability and who use Appropriate Auxiliary Aids and Services to navigate digital content and who have accessed, attempted to access, or been deterred from attempting to access, or who will access, attempt to access, or be deterred from attempting to access, [<https://www.pcrichard.com/>] from the United States” (Doc. 31, p. 2.).

(e) Class Counsel engaged in years of arm’s-length, serious, informed, and non-collusive negotiations with knowledgeable and experienced counsel. These negotiations were adversarial and required thoughtfulness and discipline to steer the action toward a resolution without compromising the injunctive relief sought on behalf of the Settlement Class Members.

(f) On April 13, 2023, as required by the Agreement and ordered by the Court, Class Counsel notified the following organizations of the Agreement, the settlement website published by Defendant, the objection deadline, and various other documents filed in the course of this litigation: ACHIEVA, American Action Fund for Blind Children and Adults, American

Council of the Blind, American Foundation for the Blind, Blinded American Veterans Foundation, Blinded Veterans Association, Foundation Fighting Blindness, Pennsylvania Association for the Blind, Disability Law Center, Disability Rights Education and Defense Fund, and National Federation of the Blind.

(g) On April 13, 2023, Class Counsel also notified the following organizations of the Agreement, the settlement website published by Defendant, the objection deadline, and various other documents filed in the course of this litigation: Lighthouse Guild International, Blind and Vision Rehabilitation Services of Pittsburgh, Beaver County Association for the Blind, Blair/Clearfield Association for the Blind and Visually Impaired, Bucks County Association for the Blind and Visually Impaired, Cambria County Association for the Blind & Handicapped, Center for the Blind and Visually Impaired, Central Susquehanna Sight Services, Chester County Association for the Blind and Visually Impaired, Community Services for Sight, Fayette County Association for the Blind, Guide Dogs for the Blind, Keystone Blind Association, Lackawanna Blind Association, Montgomery County Association for the Blind, National Council on Disability, North Central Sight Services, NuVisions Center, Sights for Hope, South Central Blind Association, The Blind Association of Butler and Armstrong, The Sight Center of Northwest PA, Venango County Association for the Blind, Vision Resource Center of Berks County, Vision Resources of Central Pennsylvania, VisionCorps, VisionLink, and Westmoreland County Blind Association.

(h) Class Counsel prepared and filed Plaintiff's final approval motion and supporting documents.

(i) Class Counsel prepared and filed Plaintiff's Motion for Attorneys' Fees and Incentive Award and supporting documents.

(j) In addition to the above efforts, the Agreement includes deadlines during the Agreement Term by which Class Counsel must complete various tasks, other obligations that occur annually, and potentially unlimited representation of Settlement Class Members over the next three years, including during informal meet-and-confers with defense counsel, at mediation, and before the Court.

CLASS COUNSEL’S SUBMITTED LODESTAR

16. Class Counsel have spent a total of 128.3 hours prosecuting Plaintiff’s claim through today’s date.

17. When applied to Class Counsel’s hourly rates, Plaintiff’s lodestar is \$68,727.50.

East End Trial Group LLC									
Attorney	2020		2021		2022		2023		Lodestar
	Rate	Hours	Rate	Hours	Rate	Hours	Rate	Hours	
Kevin Tucker	\$575	6.3	\$575	5.9	\$600	56.2	\$600	14.2	\$49,255.00
Kevin Abramowicz	\$575	—	\$575	—	\$600	4.4	\$600	—	\$2,530.00
Chandler Steiger	—	—	\$350	—	\$400	4.7	\$425	—	\$1,880.00
Stephanie Moore	—	—	\$350	—	\$400	19.7	\$425	16.9	\$15,062.50
								Total Hours	Total Lodestar
								128.3	\$68,727.50

18. Plaintiff seeks \$55,000.00 as a prevailing party attorneys’ fee, which amounts to 80.03% of Class Counsel’s lodestar to date.

19. Time sheets reflecting work billed on behalf of Plaintiff and the class accompany this declaration.

COSTS AND EXPENSES

20. Class Counsel do not seek reimbursement for the costs incurred in connection with this action.

I declare pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: June 6, 2023

/s/ Kevin W. Tucker

Kevin W. Tucker (He/Him) (PA 312144)

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Class Counsel's Time Sheets

Date	Timekeeper	Task Description	Hourly Rate (\$)	Hours	Fee (\$)
3/25/2020	K. Tucker	Email to client re PC Richard website	\$ 575.00	0.5	\$ 287.50
3/25/2020	K. Tucker	Review accessibility of Website on VoiceOver, and end-user usability testing results	\$ 575.00	1.5	\$ 862.50
3/25/2020	K. Tucker	Prepare draft complaint	\$ 575.00	0.5	\$ 287.50
3/25/2020	K. Tucker	Email to attorney C. Lewis re accessibility of PC Richard Website and client's claim	\$ 575.00	0.3	\$ 172.50
4/2/2020	K. Tucker	Email to/from attorney C. Fenlon re Douglass claim	\$ 575.00	0.2	\$ 115.00
4/9/2020	K. Tucker	Review 408 email from attorney G. Castello	\$ 575.00	0.1	\$ 57.50
4/10/2020	K. Tucker	408 email to G. Castello	\$ 575.00	0.5	\$ 287.50
4/24/2020	K. Tucker	408 email to G. Castello	\$ 575.00	0.5	\$ 287.50
4/28/2020	K. Tucker	Case update email to G. Castello	\$ 575.00	0.1	\$ 57.50
4/29/2020	K. Tucker	Conference call with G. Castello	\$ 575.00	0.5	\$ 287.50
5/2/2020	K. Tucker	Email to client re case update	\$ 575.00	0.2	\$ 115.00
5/20/2020	K. Tucker	Case update email to G. Castello	\$ 575.00	0.1	\$ 57.50
5/22/2020	K. Tucker	Review email from G. Castello	\$ 575.00	0.1	\$ 57.50
5/27/2020	K. Tucker	Conference call with G. Castello	\$ 575.00	0.5	\$ 287.50
6/2/2020	K. Tucker	Case update email to G. Castello	\$ 575.00	0.1	\$ 57.50
7/16/2020	K. Tucker	Case update email to G. Castello	\$ 575.00	0.1	\$ 57.50
7/17/2020	K. Tucker	Conference call with G. Castello	\$ 575.00	0.5	\$ 287.50
1/9/2021	K. Tucker	Case update email to G. Castello	\$ 575.00	0.1	\$ 57.50
1/11/2021	K. Tucker	Conference call with G. Castello	\$ 575.00	0.5	\$ 287.50
1/14/2021	K. Tucker	408 email to G. Castello	\$ 575.00	0.7	\$ 402.50
1/25/2021	K. Tucker	Case update email to G. Castello	\$ 575.00	0.1	\$ 57.50
2/26/2021	K. Tucker	Conference call with G. Castello	\$ 575.00	0.5	\$ 287.50
2/26/2021	K. Tucker	408 email to G. Castello re Charles Tyrwhitt	\$ 575.00	0.4	\$ 230.00
3/4/2021	K. Tucker	Review accessibility of Website on TalkBack, and end-user usability testing results	\$ 575.00	1.5	\$ 862.50
4/27/2021	K. Tucker	Case update emails to G. Castello	\$ 575.00	0.2	\$ 115.00
6/3/2021	K. Tucker	Case update emails to G. Castello	\$ 575.00	0.1	\$ 57.50
6/3/2021	K. Tucker	Conference call with G. Castello	\$ 575.00	0.5	\$ 287.50
10/26/2021	K. Tucker	Case update email to G. Castello	\$ 575.00	0.4	\$ 230.00
10/27/2021	K. Tucker	Conference call with G. Castello	\$ 575.00	0.5	\$ 287.50
11/5/2021	K. Tucker	408 email to G. Castello	\$ 575.00	0.4	\$ 230.00
1/12/2022	K. Tucker	Case update email to G. Castello	\$ 600.00	0.2	\$ 120.00
1/18/2022	K. Tucker	Conference call with G. Castello	\$ 600.00	0.5	\$ 300.00
1/18/2022	K. Tucker	Email to/from G. Castello re scheduling conflict	\$ 600.00	0.2	\$ 120.00
2/11/2022	K. Tucker	408 email to G. Castello	\$ 600.00	0.2	\$ 120.00
2/11/2022	K. Tucker	Prepare draft class action settlement agreement	\$ 600.00	2.3	\$ 1,380.00
2/17/2022	K. Tucker	Conference call with G. Castello	\$ 600.00	0.5	\$ 300.00
2/27/2022	K. Tucker	Case update email to client	\$ 600.00	0.1	\$ 60.00
3/3/2022	K. Tucker	Prepare class action complaint	\$ 600.00	1.5	\$ 900.00
3/3/2022	K. Tucker	Conference call with client re case update and filing of complaint	\$ 600.00	0.5	\$ 300.00
3/4/2022	K. Tucker	Review accessibility of Website on VoiceOver, and end-user usability testing results	\$ 600.00	1.4	\$ 840.00
3/4/2022	K. Tucker	Prepare summons, civil cover sheet	\$ 600.00	0.2	\$ 120.00
3/4/2022	K. Tucker	File complaint, summons, civil cover sheet, and save ECFs	\$ 600.00	0.5	\$ 300.00
3/4/2022	K. Tucker	Forward copy of filed complaint to G. Castello	\$ 600.00	0.1	\$ 60.00
3/4/2022	K. Tucker	Case update email to client	\$ 600.00	0.3	\$ 180.00

3/7/2022	K. Tucker	Email to C. Steiger, S. Moore, and K. Abramowicz re entries of appearance	\$ 600.00	0.1 \$	60.00
3/7/2022	K. Tucker	Review and save ECF 6 re 12b motions	\$ 600.00	0.1 \$	60.00
3/7/2022	K. Tucker	Prepare and serve waiver, complaint, summons, cover sheet	\$ 600.00	0.3 \$	180.00
3/7/2022	K. Tucker	Review email from attorney J. Berry re waiver	\$ 600.00	0.2 \$	120.00
3/7/2022	C. Steiger	prepare and file notice of appearance	\$ 400.00	0.3 \$	120.00
3/8/2022	K. Tucker	File and save ECF 8, Waiver of Service	\$ 600.00	0.1 \$	60.00
3/8/2022	K. Tucker	Forward copy of filed waiver to opposing counsel	\$ 600.00	0.1 \$	60.00
3/14/2022	K. Tucker	Review/respond to 408 emails from G. Castello	\$ 600.00	0.3 \$	180.00
4/26/2022	K. Tucker	Case update email to G. Castello	\$ 600.00	0.1 \$	60.00
5/5/2022	K. Tucker	Prepare notice of settlement and circulate to G. Castello to obtain Defendant's consent to file	\$ 600.00	0.5 \$	300.00
5/6/2022	K. Tucker	Case update email to G. Castello	\$ 600.00	0.1 \$	60.00
5/6/2022	K. Tucker	Review and save ECF 9, stipulation	\$ 600.00	0.1 \$	60.00
5/6/2022	K. Tucker	Review/respond to emails from J. Berry re stipulation	\$ 600.00	0.1 \$	60.00
5/17/2022	K. Tucker	Conference call with G. Castello	\$ 600.00	0.5 \$	300.00
5/20/2022	K. Tucker	Review/respond to G. Castello email re notice of settlement and extension	\$ 600.00	0.2 \$	120.00
5/23/2022	K. Tucker	Review and save ECF 10, motion for extension	\$ 600.00	0.1 \$	60.00
5/23/2022	K. Tucker	Review and save ECF 11, errata	\$ 600.00	0.1 \$	60.00
5/23/2022	K. Tucker	Review and consent to draft motion for extension	\$ 600.00	0.2 \$	120.00
5/26/2022	K. Tucker	Review and save ECF 12, order	\$ 600.00	0.1 \$	60.00
6/2/2022	K. Tucker	Conference call with G. Castello	\$ 600.00	0.3 \$	180.00
6/3/2022	K. Tucker	Finalize and file notice of settlement	\$ 600.00	0.3 \$	180.00
6/3/2022	K. Tucker	Email to G. Castello re notice of settlement	\$ 600.00	0.2 \$	120.00
6/6/2022	K. Tucker	Review and save ECF 14, motion	\$ 600.00	0.1 \$	60.00
6/6/2022	K. Tucker	Review/approve J. Berry's motion for extension	\$ 600.00	0.2 \$	120.00
6/7/2022	K. Tucker	Review and save ECF 15, order	\$ 600.00	0.1 \$	60.00
6/14/2022	K. Tucker	Case update emails to client	\$ 600.00	0.3 \$	180.00
6/17/2022	K. Tucker	408 email to G. Castello	\$ 600.00	0.2 \$	120.00
6/29/2022	K. Tucker	Preliminary review of Defendant's proposed revisions to class action settlement agreement	\$ 600.00	1 \$	600.00
7/18/2022	K. Tucker	Review and save ECF 16, status report	\$ 600.00	0.1 \$	60.00
7/18/2022	K. Tucker	Review and approve J. Berry's draft status report	\$ 600.00	0.2 \$	120.00
7/20/2022	K. Tucker	Review and save ECF 17, Order	\$ 600.00	0.1 \$	60.00
8/17/2022	K. Tucker	Prepare and file consent motion for extension	\$ 600.00	0.3 \$	180.00
8/17/2022	K. Tucker	Review and save ECF 19, order	\$ 600.00	0.1 \$	60.00
8/17/2022	K. Tucker	Email to K. Abramowicz re class action settlement agreement	\$ 600.00	0.2 \$	120.00
8/17/2022	K. Tucker	Prepare extension request and circulate for defendant's consent	\$ 600.00	0.3 \$	180.00
8/17/2022	K. Abramowicz	Review and propose revisions to class action settlement agreement	\$ 575.00	2.9	\$ 1,667.50
8/18/2022	K. Tucker	Review defendant's proposed revisions to class action settlement agreement and revise	\$ 600.00	3.5 \$	2,100.00
8/18/2022	K. Abramowicz	Review and propose revisions to class action settlement agreement	\$ 575.00	1.5	\$ 862.50
8/19/2022	K. Tucker	Review defendant's proposed revisions to class action settlement agreement and revise	\$ 600.00	3 \$	1,800.00
9/8/2022	K. Tucker	Case update email to G. Castello	\$ 600.00	0.1 \$	60.00
9/8/2022	K. Tucker	Conference call with G. Castello	\$ 600.00	0.4 \$	240.00

9/14/2022	K. Tucker	Emails to/from G. Castello re possible continuance	\$	600.00	0.2	\$	120.00
9/15/2022	K. Tucker	Review/approve attorney Kelli Lee's draft status report	\$	600.00	0.2	\$	120.00
9/15/2022	K. Tucker	Review and save ECF 20, status report	\$	600.00	0.1	\$	60.00
9/15/2022	K. Tucker	Review and save ECF 21, order	\$	600.00	0.1	\$	60.00
9/26/2022	K. Tucker	Case update email to G. Castello	\$	600.00	0.1	\$	60.00
9/28/2022	K. Tucker	Conference call with G. Castello	\$	600.00	0.5	\$	300.00
10/7/2022	K. Tucker	Conference call with G. Castello	\$	600.00	0.3	\$	180.00
10/12/2022	K. Tucker	Zoom conference with G. Castello and Defendant's experts	\$	600.00	3.5	\$	2,100.00
10/14/2022	K. Tucker	Case update emails with K. Lee and G. Castello	\$	600.00	0.2	\$	120.00
10/17/2022	K. Tucker	Review and save ECF 22, status report	\$	600.00	0.1	\$	60.00
10/17/2022	K. Tucker	Review and approve K. Lee's draft status report	\$	600.00	0.1	\$	60.00
10/18/2022	K. Tucker	Review and save ECF 23, order	\$	600.00	0.1	\$	60.00
10/20/2022	K. Tucker	Review consultant's email re logbook	\$	600.00	0.5	\$	300.00
10/20/2022	K. Tucker	Zoom conference with G. Castello and Defendant's experts	\$	600.00	4	\$	2,400.00
10/21/2022	K. Tucker	Case update email to G. Castello	\$	600.00	0.1	\$	60.00
10/29/2022	K. Tucker	Review defendant's proposed revisions to class action settlement agreement and revise	\$	600.00	2	\$	1,200.00
10/31/2022	K. Tucker	Review defendant's proposed revisions to class action settlement agreement and revise	\$	600.00	2.5	\$	1,500.00
11/1/2022	K. Tucker	Review defendant's proposed revisions to class action settlement agreement and revise	\$	600.00	3.1	\$	1,860.00
11/14/2022	K. Tucker	Case update emails with G. Castello	\$	600.00	0.3	\$	180.00
11/14/2022	K. Tucker	Conference call with G. Castello	\$	600.00	0.6	\$	360.00
11/16/2022	K. Tucker	Review and save ECF 24, status report	\$	600.00	0.1	\$	60.00
11/16/2022	K. Tucker	Review and approve K. Lee's draft status report	\$	600.00	0.1	\$	60.00
11/17/2022	K. Tucker	Review and save ECF 25, order	\$	600.00	0.1	\$	60.00
11/28/2022	K. Tucker	Case update emails with G. Castello	\$	600.00	0.2	\$	120.00
11/28/2022	S. Moore	Begin drafting Motion for Preliminary Approval and Notice Plan	\$	400.00	5.2	\$	2,080.00
11/29/2022	S. Moore	Continue drafting Notice Plan, Proposed order	\$	400.00	2.3	\$	920.00
11/29/2022	S. Moore	Begin drafting brief in support of motion for preliminary approval	\$	400.00	3.2	\$	1,280.00
11/30/2022	S. Moore	Continue drafting brief in support of motion for prelim. approval	\$	400.00	6.1	\$	2,440.00
12/1/2022	K. Tucker	Case update emails with G. Castello	\$	600.00	0.1	\$	60.00
12/1/2022	K. Tucker	Conference call with G. Castello	\$	600.00	0.4	\$	240.00
12/1/2022	K. Tucker	Preliminary review of S. Moore's draft motion for preliminary approval and supporting documents	\$	600.00	0.8	\$	480.00
12/1/2022	S. Moore	Finalize first drafts of motion for prelim. approval, brief in support, notice plan, and proposed order; sent to K. Tucker for review, revision, approval	\$	400.00	2.2	\$	880.00
12/2/2022	K. Tucker	Review and save ECF 26, status report	\$	600.00	0.1	\$	60.00
12/5/2022	K. Tucker	Review and save ECF 27, order	\$	600.00	0.1	\$	60.00
12/5/2022	K. Tucker	Review and save ECF 28, notice	\$	600.00	0.1	\$	60.00
12/7/2022	K. Tucker	Review defendant's proposed revisions to class action settlement agreement and revise	\$	600.00	0.5	\$	300.00
12/8/2022	K. Tucker	Review defendant's proposed revisions to class action settlement agreement and revise	\$	600.00	0.4	\$	240.00
12/14/2022	K. Tucker	Case update email to client	\$	600.00	0.3	\$	180.00
12/14/2022	K. Tucker	Case update email to client	\$	600.00	0.1	\$	60.00

12/14/2022	K. Tucker	Case update emails to/from G. Castello	\$	600.00	0.3	\$	180.00
12/15/2022	K. Tucker	Preliminary review of S. Moore's proposed revisions to class action settlement agreement	\$	600.00	0.5	\$	300.00
12/15/2022	K. Tucker	Conference call with G. Castello	\$	600.00	0.5	\$	300.00
12/15/2022	K. Tucker	Circulate proposed final agreement	\$	600.00	0.3	\$	180.00
12/15/2022	S. Moore	Reviewed K. Tucker's revisions to the class action settlement agreement and made further edits	\$	400.00	0.7	\$	280.00
12/16/2022	K. Tucker	Preliminary review of C. Steiger's proposed revisions to brief in support of preliminary approval and other docs	\$	600.00	0.7	\$	420.00
12/16/2022	K. Tucker	Case update email to client	\$	600.00	0.1	\$	60.00
12/16/2022	K. Tucker	Review and save ECF 29, Answer	\$	600.00	0.3	\$	180.00
12/16/2022	K. Tucker	Send class action settlement agreement to client for review and execution	\$	600.00	0.2	\$	120.00
12/16/2022	K. Tucker	Circulate proposed final, final agreement	\$	600.00	0.2	\$	120.00
12/16/2022	K. Tucker	Conference call with G. Castello	\$	600.00	0.4	\$	240.00
12/16/2022	C. Steiger	edited memorandum in support of plaintiff's motion for class certification and preliminary approval; created tables of contents and authorities for same; emailed same to K. Tucker for review	\$	400.00		\$	1,760.00
12/17/2022	K. Tucker	Proofread, revise, finalize motion for preliminary approval and supporting documents	\$	600.00	3	\$	1,800.00
12/18/2022	K. Tucker	Proofread, revise, finalize motion for preliminary approval and supporting documents	\$	600.00	3.9	\$	2,340.00
12/18/2022	K. Tucker	File motion for preliminary approval and supporting documents	\$	600.00	0.3	\$	180.00
12/18/2022	K. Tucker	Circulate fully executed class action settlement agreement among counsel	\$	600.00	0.1	\$	60.00
12/19/2022	K. Tucker	Attend ICMC	\$	600.00	0.5	\$	300.00
12/19/2022	K. Tucker	Review and save ECF 33, minute entry	\$	600.00	0.1	\$	60.00
1/4/2023	K. Tucker	Case update email to G. Castello	\$	600.00	0.1	\$	60.00
1/4/2023	K. Tucker	Prepare joint proposed order granting preliminary approval motion, in word format, with spaces for dates	\$	600.00	0.3	\$	180.00
1/6/2023	K. Tucker	Review and save ECF 35, Defendant's response to motion for preliminary approval	\$	600.00	0.2	\$	120.00
1/9/2023	K. Tucker	Circulate joint proposed order among counsel	\$	600.00	0.2	\$	120.00
1/9/2023	K. Tucker	Conference call with G. Castello	\$	600.00	0.4	\$	240.00
1/11/2023	K. Tucker	Case update email to G. Castello	\$	600.00	0.1	\$	60.00
1/12/2023	K. Tucker	File notice of parties' joint proposed order	\$	600.00	0.2	\$	120.00
1/12/2023	K. Tucker	Email Word copy of proposed order to N. Fabi	\$	600.00	0.2	\$	120.00
1/20/2023	K. Tucker	Coordinate new hearing date with defense counsel	\$	600.00	0.2	\$	120.00
1/24/2023	K. Tucker	Review and save ECF 38, motion to continue	\$	600.00	0.1	\$	60.00
1/24/2023	K. Tucker	Review and approve K. Lee's draft motion to adjourn/continue	\$	600.00	0.2	\$	120.00
2/22/2023	K. Tucker	Case update email to G. Castello	\$	600.00	0.1	\$	60.00
2/23/2023	K. Tucker	Conference call with G. Castello	\$	600.00	0.4	\$	240.00
3/6/2023	K. Tucker	Conference call with G. Castello re settlement website	\$	600.00	0.5	\$	300.00
3/13/2023	K. Tucker	Prepare, coordinate, and file joint consent to proceed before magistrate form	\$	600.00	0.3	\$	180.00
3/15/2023	K. Tucker	Review S. Moore's revisions to proposed order	\$	600.00	0.2	\$	120.00
3/15/2023	S. Moore	Traveled to and from Federal Courthouse for MFPA hearing	\$	425.00	0.4	\$	170.00
3/15/2023	S. Moore	Participated in MFPA Hearing	\$	425.00	1.3	\$	552.50

3/16/2023	K. Tucker	Review S. Moore's email to N. Fabi re proposed order	\$ 600.00	0.1	\$ 60.00
3/16/2023	K. Tucker	Review and save ECF 46, Order granting preliminary approval	\$ 600.00	0.2	\$ 120.00
3/16/2023	K. Tucker	Meet with S. Moore to discuss Defendant's request for accessible versions of filed documents	\$ 600.00	0.3	\$ 180.00
3/16/2023	S. Moore	Prepared proposed order and emailed to opposing counsel and court	\$ 425.00	1	\$ 425.00
3/17/2023	K. Tucker	Review S. Moore's email to G. Castello re PDFs	\$ 600.00	0.1	\$ 60.00
3/20/2023	K. Tucker	Provide summary of defendant's notice obligations to G. Castello	\$ 600.00	0.5	\$ 300.00
3/21/2023	K. Tucker	Case update email to client	\$ 600.00	0.1	\$ 60.00
3/27/2023	K. Tucker	Test accessibility of complaint PDF on VoiceOver	\$ 600.00	0.2	\$ 120.00
3/27/2023	K. Tucker	Review/respond to G. Castello emails re accessibility of PDFs for settlement website	\$ 600.00	0.7	\$ 420.00
3/28/2023	K. Tucker	Conference call with G. Castello	\$ 600.00	0.3	\$ 180.00
3/29/2023	K. Tucker	Review/respond to G. Castello emails re notice	\$ 600.00	0.4	\$ 240.00
4/6/2023	K. Tucker	Review and respond to email from class member T.	\$ 600.00	0.4	\$ 240.00
4/6/2023	K. Tucker	Review/respond to G. Castello emails re notice	\$ 600.00	0.3	\$ 180.00
4/6/2023	K. Tucker	Review S. Moore emails re notice	\$ 600.00	0.1	\$ 60.00
4/12/2023	K. Tucker	Email to S. Moore re notice contact list	\$ 600.00	0.3	\$ 180.00
4/13/2023	K. Tucker	Review/revise/approve S. Moore draft notice to advocacy organizations	\$ 600.00	0.4	\$ 240.00
4/13/2023	S. Moore	Prepared notice email to be sent to organizations per the SA	\$ 425.00	1	\$ 425.00
4/13/2023	S. Moore	Sent notice to organizations per the SA	\$ 425.00	0.4	\$ 170.00
5/10/2023	K. Tucker	Review/respond to G. Castello email re notice declaration	\$ 600.00	0.1	\$ 60.00
5/11/2023	K. Tucker	Update email to client	\$ 600.00	0.1	\$ 60.00
5/12/2023	K. Tucker	Review S. Moore email re defendant's notice declaration	\$ 600.00	0.1	\$ 60.00
5/12/2023	K. Tucker	Review, revise, approve S. Moore notice declaration	\$ 600.00	0.2	\$ 120.00
5/12/2023	K. Tucker	Review and save ECF 48, declaration	\$ 600.00	0.1	\$ 60.00
5/17/2023	K. Tucker	Conference call with class member	\$ 600.00	0.7	\$ 420.00
5/30/2023	S. Moore	Draft motion for final approval	\$ 425.00	0.4	\$ 170.00
5/30/2023	S. Moore	Draft motion for final approval proposed order	\$ 425.00	1	\$ 425.00
5/30/2023	S. Moore	Draft brief in support of motion for final approval	\$ 425.00	2.5	\$ 1,062.50
5/30/2023	S. Moore	Draft motion for fees	\$ 425.00	0.1	\$ 42.50
5/30/2023	S. Moore	Draft proposed order to motion for fees	\$ 425.00	0.3	\$ 127.50
5/30/2023	S. Moore	Draft brief in support of motion for fees	\$ 425.00	2	\$ 850.00
5/30/2023	S. Moore	Draft K. Tucker declaration in support of motion for fees	\$ 425.00	0.3	\$ 127.50
6/1/2023	K. Tucker	Preliminary review of S. Moore's draft motion for final approval, motion for fees, and supporting documents	\$ 600.00	0.6	\$ 360.00
6/1/2023	S. Moore	Draft motion for fees	\$ 425.00	0.1	\$ 42.50
6/1/2023	S. Moore	Drafted brief in support of motion for fees	\$ 425.00	2.5	\$ 1,062.50
6/1/2023	S. Moore	Finalize first drafts of motion for fees and motion for final approval, and all supporting documents and send to K. Tucker to review/revise	\$ 425.00	1.5	\$ 637.50
6/2/2023	K. Tucker	Review time submitted by K. Abramowicz, C. Stieger, and S. Moore for redundancies	\$ 600.00	0.5	\$ 300.00
06/02/23	K. Tucker	Email to G. Castello re Motion for Fees and Motion for Final Approval	\$ 600.00	0.1	\$ 60.00

6/5/2023	K. Tucker	Review, revise motion for final approval, fees, and supporting documents, and send revisions to S. Moore	\$ 600.00	2.3	\$ 1,380.00
6/6/2023	K. Tucker	Finalize Tucker delcaration and brief in support of fees with lodestar calculations	\$ 600.00	0.7	\$ 420.00
6/6/2023	K. Tucker	Assist S. Moore with finalizing motion for final approval, fees, and supporting documents for filing	\$ 600.00	0.5	\$ 300.00
6/6/2023	S. Moore	Review/accept K. Tucker's revisions to motion for final approval and motion for fees, and supporting documents, proofread	\$ 425.00	1.1	\$ 467.50
6/6/2023	S. Moore	Prepare and file motion for final approval and motion for fees, and supporting documents	\$ 425.00	1	\$ 425.00
06/06/23	K. Tucker	Email to G. Castello re Motion for Fees and Motion for Final Approval	\$ 600.00	0.1	\$ 60.00
				128.3	\$ 68,727.50