

		<u>Hrs/Rate</u>	<u>Amount</u>
12/29/2017	RMW Review and sign Notice of Association	0.10 650.00/hr	65.00
12/30/2017	RMW Receive and review Repair Order summary	0.20 650.00/hr	130.00
	RMW Receive and analyze client file	2.30 650.00/hr	1,495.00
1/5/2018	LBV Prepare for depositions of dealership today; Travel to and from and attend non appearance depositions for ten dealership personnel	3.50 350.00/hr	1,225.00
2/12/2018	RE Draft, review and revise Plaintiff's Objections to Notice of Deposition of Plaintiff; Draft, review and revise proof(s) of service; Draft, review and revise email to Nationwide regarding service; Serve same	0.20 200.00/hr	40.00
2/28/2018	RE Receive and review email from opposing counsel regarding scheduling plaintiff's deposition and the Vehicle Inspection; Draft, review and revise email to opposing counsel regarding same	0.10 200.00/hr	NO CHARGE
3/2/2018	ARS Emails with opposing counsel Corneil regarding plaintiff and Person most knowledgeable depositions, trial schedule, request for continuance (4 emails)	0.20 450.00/hr	90.00
3/7/2018	RE Prepare documents for Person most knowledgeable deposition	0.20 200.00/hr	40.00
	RE Draft, review and revise Plaintiff's Objections to Notice of Deposition of Plaintiff; Draft, review and revise proof(s) of service; Draft, review and revise email to Nationwide regarding service; Serve same	0.20 200.00/hr	40.00

		<u>Hrs/Rate</u>	<u>Amount</u>
3/9/2018	RMW Prepare for deposition of McDowell; Take deposition of McDowell	2.50 575.00/hr	1,437.50
3/19/2018	RE Draft, review and revise Notice of Deposition of FCA's expert Jan Swart or Jeremiah Stepan; Draft, review and revise Notice of Deposition of FCA Expert Richard Schmidt, or Stan Gozzi, or Jeff Richards; Draft, review and revise proof(s) of service; Draft, review and revise email to Nationwide regarding service; Serve same	0.30 200.00/hr	60.00
3/23/2018	RE Draft, review and revise email to opposing counsel regarding confirmation of expert deposition; Receive and review email from opposing counsel regarding same	0.10 200.00/hr	NO CHARGE
3/26/2018	LBV Draft, review and revise opposition to ex parte to continue trial; Prepare for hearings on both ex partes	4.10 350.00/hr	1,435.00
	RE Receive and review email from opposing counsel regarding Defendant's Objections to Expert Depositions; Draft, review and revise email to opposing counsel regarding same	0.10 200.00/hr	20.00
	RE Draft, review and revise email to opposing counsel regarding Defendant's additions to the Joint Trial Readiness Conference Report	0.10 200.00/hr	20.00
	RE Prepare draft of Joint Trial Readiness Conference Report; Review file and pull exhibits for trial	1.50 200.00/hr	300.00
	RE Receive and review email regarding Ex Parte Notice to Continue Trial; Draft, review and revise email to opposing counsel regarding intent to oppose	0.10 200.00/hr	20.00
	RE Draft, review and revise Plaintiff's Objections to Notice of Deposition of Barbara Luna; Draft, review and revise proof(s) of service; Draft, review and revise email to Nationwide regarding service	0.20 200.00/hr	40.00
	ARS Review and revise Joint Trial Readiness Conference Report	0.30 450.00/hr	135.00
	JRU Revise and review Opposition to Defendant's ex parte to continue trial	0.60 400.00/hr	240.00
3/27/2018	LBV Travel to and from and attend ex partes to continue trial and to specially set Motion to Compel hearings	2.80 350.00/hr	980.00
6/20/2018	RE Draft, review and revise email to opposing counsel regarding Defendant's additions to the TRC Report	0.10 200.00/hr	20.00

			<u>Hrs/Rate</u>	<u>Amount</u>
6/20/2018	RE	Receive and review email from opposing counsel regarding court reporter for Person most knowledgeable deposition; Draft, review and revise email to opposing counsel regarding same	0.10 200.00/hr	20.00
	RE	Prepare updated draft of TRC Report	0.20 200.00/hr	40.00
	ARS	Review and revise updated draft of TRC Report	0.20 450.00/hr	90.00
6/25/2018	LBV	Prepare for dealer deposition this week	1.30 350.00/hr	455.00
6/28/2018	LBV	Travel to and from and attend dealer depositions of Carl Burger Dodge	5.80 350.00/hr	2,030.00
	RE	Draft, review and revise email to opposing counsel regarding finalized TRC Report	0.10 200.00/hr	20.00
	RE	Draft, review and revise email to opposing counsel regarding adding witness to TRC Report	0.10 200.00/hr	20.00
	ARS	Review and revise TRC Report after Defendant's additions	0.20 450.00/hr	90.00
	RE	Receive and review email from opposing counsel regarding Defendant's additions to the Trial Readiness Conference Report	0.10 200.00/hr	20.00
6/29/2018	JRU	Travel to and from and attend Trial Readiness Conference (split with 3 other cases)	1.10 400.00/hr	440.00
7/3/2018	JRU	Client communication	1.20 400.00/hr	480.00
7/4/2018	ARS	Travel to Rochester MN for deposition tomorrow	12.00 450.00/hr	5,400.00
7/5/2018	ARS	Prepare for, travel to and from and attend deposition of Maged Taha	5.50 450.00/hr	2,475.00
7/6/2018	ARS	Travel to and from and attend Vehicle Inspection	4.00 450.00/hr	1,800.00
	ARS	Travel back to San Diego	10.00 450.00/hr	4,500.00
7/10/2018	LBV	Conference with Blasjo regarding deposition tomorrow	0.30 350.00/hr	105.00

			<u>Hrs/Rate</u>	<u>Amount</u>
7/11/2018	LBV	Prepare for deposition of Blasjo; Attend deposition of Blasjo	4.10 350.00/hr	1,435.00
7/13/2018	SLA	Draft, review and revise damages model	0.40 175.00/hr	70.00
	RE	Draft, review and revise email to opposing counsel regarding change in location of FCA's expert's deposition; Receive and review email from opposing counsel regarding same	0.10 200.00/hr	NO CHARGE
7/17/2018	RE	Receive and review email from opposing counsel regarding transmission fluid test; Draft, review and revise email to opposing counsel regarding same	0.10 200.00/hr	20.00
	RE	Draft, review and revise email to opposing counsel regarding Defendant's additions to the Joint Jury Instructions	0.10 200.00/hr	20.00
	RE	Prepare draft of Joint Jury Instructions	0.50 200.00/hr	100.00
	RE	Receive and review email from opposing counsel regarding confirmation of FCA's expert's deposition; Draft, review and revise email confirming	0.10 200.00/hr	NO CHARGE
7/19/2018	RE	Draft, review and revise follow up email to opposing counsel regarding Defendant's additions to the jury instructions	0.10 200.00/hr	20.00
	RE	Prepare, file, and serve Plaintiff's Affirmative Duty Trial Brief, Plaintiff's Claims and Relief Sought Trial Brief; Draft, review and revise proof(s) of service; Draft, review and revise email to Nationwide regarding service	0.20 200.00/hr	40.00
	RE	Review and revise joint jury instructions after Defendant's additions; Draft, review and revise email to opposing counsel regarding jury instructions for signature	0.20 200.00/hr	40.00
	RE	Prepare draft of Plaintiff's Affirmative Duty Trial Brief	0.30 200.00/hr	60.00
	RE	Prepare draft of Plaintiff's Claims and Relief Sought Trial Brief	0.40 200.00/hr	80.00
	RE	Prepare, file, and serve Plaintiff's Motions in Limine No. 1-13; Draft, review and revise proof(s) of service; Draft, review and revise email to Nationwide regarding service	0.70 200.00/hr	140.00
	RE	Receive and review email from opposing counsel regarding Defendant's additions to the joint jury instructions	0.10 200.00/hr	20.00

		<u>Hrs/Rate</u>	<u>Amount</u>
7/19/2018	RE Draft, review and revise Plaintiff's Motions in Limine No. 2	0.20 200.00/hr	40.00
	RE Draft, review and revise Plaintiff's Motions in Limine No. 3	0.20 200.00/hr	40.00
	RE Draft, review and revise Plaintiff's Motions in Limine No. 4	0.20 200.00/hr	40.00
	RE Draft, review and revise Plaintiff's Motions in Limine No. 5	0.20 200.00/hr	40.00
	RE Draft, review and revise Plaintiff's Motions in Limine No. 6	0.20 200.00/hr	40.00
	RE Draft, review and revise Plaintiff's Motions in Limine No. 7	0.20 200.00/hr	40.00
	RE Draft, review and revise Plaintiff's Motions in Limine No. 8	0.20 200.00/hr	40.00
	RE Draft, review and revise Plaintiff's Motions in Limine No. 9	0.20 200.00/hr	40.00
	RE Draft, review and revise Plaintiff's Motions in Limine No. 10	0.20 200.00/hr	40.00
	RE Draft, review and revise Plaintiff's Motions in Limine No. 11	0.20 200.00/hr	40.00
	RE Draft, review and revise Plaintiff's Motions in Limine No. 12	0.20 200.00/hr	40.00
	RE Draft, review and revise Plaintiff's Motions in Limine No. 13	0.20 200.00/hr	40.00
	ARS Review and revise Plaintiff's Claims and Relief Sought Trial Brief	0.20 450.00/hr	90.00
	ARS Review and revise Plaintiff's Affirmative Duty Trial Brief	0.20 450.00/hr	90.00
	RE Draft, review and revise Plaintiff's Motions in Limine No. 1	0.20 200.00/hr	40.00
	JRU Review and revise Plaintiff's Motion in Limine No. 6	0.50 400.00/hr	200.00

			<u>Hrs/Rate</u>	<u>Amount</u>
7/19/2018	JRU	Review and revise Plaintiff's Motion in Limine No. 7	0.50 400.00/hr	200.00
	JRU	Review and revise Plaintiff's Motion in Limine No. 8	0.50 400.00/hr	200.00
	JRU	Review and revise Plaintiff's Motion in Limine No. 9	0.50 400.00/hr	200.00
	JRU	Review and revise Plaintiff's Motion in Limine No. 10	0.50 400.00/hr	200.00
	JRU	Review and revise Plaintiff's Motion in Limine No. 11	0.50 400.00/hr	200.00
	JRU	Review and revise Plaintiff's Motion in Limine No. 12	0.50 400.00/hr	200.00
	JRU	Review and revise Plaintiff's Motion in Limine No. 13	0.50 400.00/hr	200.00
	JRU	Review and revise Plaintiff's Motion in Limine No. 1	0.50 400.00/hr	200.00
	JRU	Review and revise Plaintiff's Motion in Limine No. 2	0.50 400.00/hr	200.00
	JRU	Review and revise Plaintiff's Motion in Limine No. 3	0.50 400.00/hr	200.00
	JRU	Review and revise Plaintiff's Motion in Limine No. 4	0.50 400.00/hr	200.00
	JRU	Review and revise Plaintiff's Motion in Limine No. 5	0.50 400.00/hr	200.00
7/20/2018	RE	Prepare, file, and serve Joint Jury Instructions and Plaintiff's Special Jury Instructions; Draft, review and revise proof(s) of service; Draft, review and revise email to opposing counsel regarding service	0.10 200.00/hr	20.00
	RE	Draft, review and revise Plaintiff's Special Jury Instructions	0.10 200.00/hr	20.00
	RE	Receive and review email from opposing counsel regarding signed jury instructions	0.10 200.00/hr	20.00
7/24/2018	RE	Prepare draft of Joint Statement of the Case	0.10 200.00/hr	20.00

		<u>Hrs/Rate</u>	<u>Amount</u>
7/24/2018	RE Prepare draft of Joint Witness List	0.10 200.00/hr	20.00
	RE Draft, review and revise email to opposing counsel regarding Defendant's additions to the joint trial documents	0.10 200.00/hr	20.00
	ARS Review and revise Joint Statement of the Case	0.10 450.00/hr	45.00
	ARS Review and revise Joint Witness List	0.20 450.00/hr	90.00
	ARS Review and revise Joint Exhibit List	0.20 450.00/hr	90.00
	JRU Draft, review and revise Opposition to Defendant's Motion in Limine No. 7	0.50 400.00/hr	200.00
	RE Prepare draft of Joint Exhibit List	0.60 200.00/hr	120.00
	JRU Draft, review and revise Opposition to Defendant's Motion in Limine No. 1	0.50 400.00/hr	200.00
	JRU Draft, review and revise Opposition to Defendant's Motion in Limine No. 2	0.50 400.00/hr	200.00
	JRU Draft, review and revise Opposition to Defendant's Motion in Limine No. 3	0.50 400.00/hr	200.00
	JRU Draft, review and revise Opposition to Defendant's Motion in Limine No. 4	0.50 400.00/hr	200.00
	JRU Draft, review and revise Opposition to Defendant's Motion in Limine No. 5	0.50 400.00/hr	200.00
	JRU Draft, review and revise Opposition to Defendant's Motion in Limine No. 6	0.50 400.00/hr	200.00
7/25/2018	RE Draft, review and revise email to Nationwide regarding courtesy copies of the Joint Jury Instructions, Plaintiff's Special Jury Instructions, Declaration of Associate attorney Amy Smith regarding Jury Instructions	0.10 200.00/hr	20.00
	ARS Review and revise Declaration of Associate attorney Amy Smith regarding Jury Instructions	0.10 450.00/hr	45.00
	RE Prepare draft of Declaration of Associate attorney Amy Smith regarding Jury Instructions	0.20 200.00/hr	40.00

			<u>Hrs/Rate</u>	<u>Amount</u>
7/25/2018	RE	Prepare, finalize, and serve Plaintiff's Opposition to FCA's Motions in Limine 1-12; Draft, review and revise proof(s) of service; Draft, review and revise email to Nationwide regarding service	0.50 200.00/hr	100.00
	RE	Prepare drafts of Plaintiff's Opposition to FCA's Motions in Limine 1-12	0.80 200.00/hr	160.00
	JRU	Draft, review and revise Opposition to Defendant's Motion in Limine No. 8	0.50 400.00/hr	200.00
	JRU	Draft, review and revise Opposition to Defendant's Motion in Limine No. 9	0.50 400.00/hr	200.00
	JRU	Draft, review and revise Opposition to Defendant's Motion in Limine No. 10	0.50 400.00/hr	200.00
	JRU	Draft, review and revise Opposition to Defendant's Motion in Limine No. 11	0.50 400.00/hr	200.00
	JRU	Draft, review and revise Opposition to Defendant's Motion in Limine No. 12	0.50 400.00/hr	200.00
7/26/2018	RE	Draft, review and revise email to opposing counsel regarding Plaintiff's revisions to the joint trial documents	0.10 200.00/hr	20.00
	RE	Review and revise Joint Witness List	0.10 200.00/hr	20.00
	RE	Review and revise Joint Statement of the Case	0.10 200.00/hr	20.00
	RE	Draft, review and revise email to opposing counsel regarding the joint trial documents for signature	0.10 200.00/hr	20.00
	RE	Receive and review email from opposing counsel regarding not agreeable to joint statement; Draft, review and revise email to opposing counsel regarding same	0.10 200.00/hr	20.00
	ARS	Review and revise Joint Statement of the Case	0.10 450.00/hr	45.00
	ARS	Review and revise Joint Witness List	0.10 450.00/hr	45.00
	ARS	Review and revise Joint Exhibit List	0.10 450.00/hr	45.00



			<u>Hrs/Rate</u>	<u>Amount</u>
7/26/2018	RE	Receive and review email from opposing counsel regarding Defendant's additions to the joint trial documents	0.10 200.00/hr	20.00
	RE	Receive and review email from opposing counsel regarding Defendant's revisions to the joint trial documents	0.10 200.00/hr	20.00
	JRU	Telephone call with David Corneil regarding stipulation to continue trial	0.20 400.00/hr	80.00
	JRU	Communication with client	0.30 400.00/hr	120.00
7/27/2018	JRU	Travel to and from and attend Trial Call	2.00 400.00/hr	800.00
8/20/2018	AM	Calendaring deadlines	0.20 175.00/hr	NO CHARGE
9/12/2018	JRU	Travel to and from and attend deposition of Defendants' Expert Richard Schmidt	4.00 400.00/hr	1,600.00
9/19/2018	AM	Draft and revise repair order history table	0.30 200.00/hr	60.00
9/20/2018	AM	Draft review and revise Page line summary of Person most knowledgeable deposition	2.90 200.00/hr	580.00
9/26/2018	RE	Review and revise Joint Witness List	0.10 200.00/hr	20.00
	RE	Draft, review and revise email to opposing counsel regarding updated joint exhibit and witness lists	0.10 200.00/hr	20.00
	ARS	Review and revise Joint Exhibit List	0.20 450.00/hr	90.00
	RE	Review and revise Joint Exhibit List; Review file and pull exhibits for trial	0.70 200.00/hr	140.00
	ARS	Review and revise Joint Witness List	0.10 450.00/hr	45.00
9/27/2018	RE	Receive and review email from opposing counsel regarding Micale on the trial documents; Draft, review and revise email to opposing counsel regarding same	0.10 200.00/hr	20.00
10/3/2018	AM	Review and update Repair Order history table and timeline	0.70 200.00/hr	140.00

			Hrs/Rate	Amount
10/3/2018	JRU	Draft, review and revise Plaintiff's Opposition to FCA's Motion in Limine No. Amended 12	0.70 400.00/hr	280.00
	JRU	Draft, review and revise Plaintiff's Opposition to FCA's Motion in Limine No. 14	0.70 400.00/hr	280.00
	JRU	Draft, review and revise Plaintiff's Opposition to FCA's Motion in Limine No. 15	0.70 400.00/hr	280.00
	JRU	Draft, review and revise Plaintiff's Opposition to FCA's Motion in Limine No. 13	0.70 400.00/hr	280.00
10/5/2018	RMW	Travel to and from and attend trial call	1.00 575.00/hr	575.00
	ARS	Client communication	0.20 450.00/hr	90.00
2/26/2019	EKB	Review and audit fees and costs invoices for memorandum of costs and Motion for Attorney's Fees	1.00 450.00/hr	450.00
3/25/2019	EKB	Travel to and from and attend hearing on Motion for Attorney's Fees (anticipated)	3.00 450.00/hr	1,350.00
	EKB	Draft, review and revise reply in support of Motion for Attorney's Fees (anticipated)	5.00 450.00/hr	2,250.00
	EKB	Draft, review and revise Motion for Attorney's Fees	7.00 450.00/hr	3,150.00
		For professional services rendered	121.20	\$47,367.50
		For professional services rendered	121.20	\$47,367.50

#### Legal Team Member Summary

Name	Hours	Rate	Amount
RMW-Richard M. Wirtz, Managing Attorney	2.60	650.00	\$1,690.00
RMW-Richard M. Wirtz, Managing Attorney	3.50	575.00	\$2,012.50
JRU-Jessica R. Underwood, Associate Attorney	24.70	400.00	\$9,880.00
LBV-Lauren B. Veggian, Associate Attorney	21.90	350.00	\$7,665.00
AM-Andrea Munoz, Paralegal	3.90	200.00	\$780.00
AM-Andrea Munoz, Paralegal	0.20	0.00	\$0.00
RE-Rebecca Evans, Paralegal	13.40	200.00	\$2,680.00
RE-Rebecca Evans, Paralegal	0.40	0.00	\$0.00
SLA-Samuel Albert, Director of Legal Services	0.40	175.00	\$70.00
ARR-Amy R. Rotman, Senior Attorney	34.20	450.00	\$15,390.00
EKB-Erin K. Barns, Senior Attorney	16.00	450.00	\$7,200.00