

		<u>Hrs/Rate</u>	<u>Amount</u>
5/3/2017	RMW Receive and review RO summary and trial deadlines	0.50 500.00/hr	250.00
5/4/2017	RMW Review and execute notice of association	0.10 500.00/hr	50.00
	RMW Review and analyze case files for developing trial strategy	1.50 500.00/hr	750.00
5/5/2017	RMW Review and analyze file regarding deadlines	0.20 500.00/hr	100.00
5/10/2017	RE Update and insert all calendar deadlines	0.50 175.00/hr	87.50
5/15/2017	EJ Draft email to Kristi Livedalen (NP) regarding coordinating deposition of Dominic Teran	0.10 175.00/hr	17.50
	ARS Review email from Kristi Livedalen (NP) regarding taking deposition of Dominic Teran	0.10 325.00/hr	32.50
5/22/2017	RMW Review and analyze trial calendar	0.10 500.00/hr	50.00
5/24/2017	EJ Draft email to Kristi Livedalen (NP) regarding deposition of Mrs. Teran	0.10 175.00/hr	17.50
	RMW Receive and review notice of deposition of Mrs. Teran	0.20 500.00/hr	100.00
	ARS Receive and review emails from Kristi Livedalen (NP) regarding deposition of Mrs. Teran	0.10 325.00/hr	32.50

			<u>Hrs/Rate</u>	<u>Amount</u>
5/30/2017	EJ	Review email from Kristi Livedalen (NP) regarding deposition of Mrs. Teran (6-15-17)	0.10 175.00/hr	17.50
	EJ	Draft email to Kristi Livedalen (NP) regarding available date for deposition of Mrs. Teran (6-15-17)	0.10 175.00/hr	17.50
	ARS	Review local Tulare rules regarding Mandatory Settlement Conference statements	0.40 325.00/hr	130.00
	ARS	Review complaint, repair orders, CAIRs to prepare to draft the Mandatory Settlement Conference statement	1.00 325.00/hr	325.00
	ARS	Draft, review and revise Mandatory Settlement Conference statement	1.40 325.00/hr	455.00
5/31/2017	ARS	Draft, review and revise email to client regarding status	0.20 325.00/hr	65.00
	ARS	Continue to draft, review and revise Mandatory Settlement Conference statement	1.10 325.00/hr	357.50
	RE	Prepare, file, and serve Plaintiff's Mandatory Settlement Conference Statement and proof(s) of service	0.20 175.00/hr	35.00
6/1/2017	EJ	Review email from Kristi Livedalen (NP) regarding deposition of Mrs. Teran (6-15-17)	0.10 175.00/hr	17.50
	EJ	Draft email to Kristi Livedalen (NP) regarding deposition of Mrs. Teran (6-15-17)	0.10 175.00/hr	17.50
	RMW	Draft, review and revise email to co counsel regarding settlement position for MSC	0.10 500.00/hr	50.00
	ARS	Review and analyze file regarding settlement; Draft, review and revise email to co counsel regarding settlement position	0.20 325.00/hr	65.00
6/2/2017	ARS	Draft, review and revise email to client regarding status	0.20 325.00/hr	65.00
	ARS	Phone call with client	0.40 325.00/hr	130.00
6/5/2017	RMW	Draft, review and revise email to co counsel regarding settlement position for MSC	0.10 500.00/hr	50.00
6/6/2017	ARS	Travel to Visalia ahead of Mandatory Settlement Conference tomorrow	6.00 325.00/hr	1,950.00
	ARS	Phone call with client; draft email to client	0.50 325.00/hr	162.50

		<u>Hrs/Rate</u>	<u>Amount</u>
6/6/2017	ARS Review client deposition summary; review file and create damages spreadsheet ahead of Mandatory Settlement Conference tomorrow	2.50 325.00/hr	812.50
6/7/2017	ARS Attend Mandatory Settlement Conference in Tulare; Drive back to San Diego	8.00 325.00/hr	2,600.00
	RMW Draft, review and revise memorandum email regarding Mandatory Settlement Conference	0.10 500.00/hr	50.00
6/8/2017	EJ Draft, prepare, and serve Plaintiff's Objections to Notice of Deposition of Plaintiff's Experts (6-12-17)	0.60 175.00/hr	105.00
6/13/2017	EJ Review email from Kimberly Taylor (NP) confirming deposition of Mrs. Teran (6-15-17); respond to email	0.10 175.00/hr	17.50
	ARS Print and compile documents to produce at Dessler Teran's deposition	0.20 325.00/hr	65.00
6/14/2017	ARS Travel to Porterville ahead of Dessier Teran's deposition tomorrow	6.00 325.00/hr	1,950.00
6/15/2017	ARS Travel to and attend deposition of Dessier Teran in Porterville; Drive back to San Diego	10.50 325.00/hr	3,412.50
6/16/2017	EJ Draft email to Scott Shepardson (NP) regarding available dates for the deposition of Porterville Chrysler	0.10 175.00/hr	17.50
6/20/2017	RE Draft, review and revise notice in lieu of subpoena, letter and notice to produce financial information, and proof(s) of service; Serve same	0.30 175.00/hr	52.50
6/27/2017	ARS Draft, review and revise email to client regarding damages	0.20 325.00/hr	65.00
	ARS Review and revise motion in limine number 1	0.50 325.00/hr	162.50
	RMW Draft, review and revise email to co counsel regarding trial continuance	0.10 500.00/hr	50.00
	ARS Draft, review and revise Plaintiff's Motions in Limine 2	0.50 325.00/hr	162.50
	ARS Draft, review and revise Plaintiff's Motions in Limine 3	0.50 325.00/hr	162.50
	ARS Draft, review and revise Plaintiff's Motions in Limine 4	0.50 325.00/hr	162.50
	ARS Draft, review and revise Plaintiff's Motions in Limine 5	0.50 325.00/hr	162.50

		<u>Hrs/Rate</u>	<u>Amount</u>
6/27/2017	ARS Draft, review and revise Plaintiff's Motions in Limine 6	0.50 325.00/hr	162.50
	ARS Draft, review and revise Plaintiff's Motions in Limine 7	0.50 325.00/hr	162.50
	ARS Draft, review and revise Plaintiff's Motions in Limine 8	0.50 325.00/hr	162.50
	ARS Draft, review and revise Plaintiff's Motions in Limine 9	0.50 325.00/hr	162.50
	ARS Draft, review and revise Plaintiff's Motions in Limine 10	0.50 325.00/hr	162.50
6/28/2017	ARS Draft, review and revise Plaintiff's Motions in Limine 12	0.50 325.00/hr	162.50
	ARS Draft, review and revise Plaintiff's Motions in Limine 11	0.50 325.00/hr	162.50
	ARS Draft, review and revise Plaintiff's Motions in Limine 13	0.50 325.00/hr	162.50
6/29/2017	ARS Draft, review and revise email to opposing counsel Spataro regarding joint document drafts	0.10 325.00/hr	32.50
	ARS Draft, review and revise email to opposing counsel Spataro regarding provide copy of court order	0.10 325.00/hr	32.50
	ARS Review email from opposing counsel Spataro regarding documents due this week	0.10 325.00/hr	32.50
	ARS Review email from opposing counsel Spataro regarding trial documents due even with stipulation for continuance	0.10 325.00/hr	32.50
	ARS Review email from opposing counsel Spataro regarding request for court order	0.10 325.00/hr	32.50
	ARS Review and revise trial brief draft	0.40 325.00/hr	130.00
	ARS Review and revise affirmative duty trial brief	0.50 325.00/hr	162.50
	JRU Draft, review and revise trial brief	1.60 250.00/hr	400.00
	JRU Review and revise trial brief per note from Amy Smith	1.00 250.00/hr	250.00

			<u>Hrs/Rate</u>	<u>Amount</u>
6/30/2017	ARS	Review email from opposing counsel Shepardson regarding permission to e-file documents	0.10 325.00/hr	32.50
	ARS	Draft, review and revise email to opposing counsel Shepardson regarding request to e-file joint documents	0.10 325.00/hr	32.50
	ARS	Review email from opposing counsel Shepardson regarding wording of joint statement	0.10 325.00/hr	32.50
	ARS	Draft, review and revise email to opposing counsel Shepardson regarding wording of joint statement	0.10 325.00/hr	32.50
	ARS	Review email from opposing counsel Shepardson regarding receipt of joint documents	0.10 325.00/hr	32.50
	ARS	Review email from opposing counsel Spataro regarding timing of filing joint documents	0.10 325.00/hr	32.50
	ARS	Draft, review and revise email to opposing counsel Spataro regarding timing of filing joint documents	0.10 325.00/hr	32.50
	ARS	Review email from opposing counsel Spataro regarding joint document drafts	0.10 325.00/hr	32.50
	ARS	Review email from opposing counsel Spataro regarding exhibit list	0.10 325.00/hr	32.50
	ARS	Review email from opposing counsel Spataro regarding receipt of order	0.10 325.00/hr	32.50
	ARS	Review email from opposing counsel Spataro regarding drafts of joint exhibit list, witness list, and statement of case	0.10 325.00/hr	32.50
	JRU	Draft, review and revise trial subpoenas and on-call letters	0.90 250.00/hr	225.00
7/3/2017	ARS	Review email from opposing counsel Spataro regarding jury instructions	0.10 325.00/hr	32.50
	ARS	Draft, review and revise email to opposing counsel Spataro regarding jury instructions	0.10 325.00/hr	32.50
7/5/2017	ARS	Review email from opposing counsel Spataro regarding ex parte to continue trial	0.10 325.00/hr	32.50
	ARS	Draft, review and revise email to opposing counsel Spataro regarding ex parte to continue trial	0.10 325.00/hr	32.50
	ARS	Review email from opposing counsel Spataro regarding new exhibit	0.10 325.00/hr	32.50

			<u>Hrs/Rate</u>	<u>Amount</u>
7/5/2017	ARS	Draft, review and revise email to opposing counsel Spataro regarding new exhibit	0.10 325.00/hr	32.50
	ARS	Draft, review and revise email to opposing counsel regarding new exhibit list draft	0.10 325.00/hr	32.50
	ARS	Draft, review and revise email to opposing counsel regarding special verdict form draft	0.10 325.00/hr	32.50
	ARS	Draft, review and revise email to opposing counsel Spataro regarding exhibit stipulations	0.10 325.00/hr	32.50
	ARS	Review email from opposing counsel Spataro regarding exhibit stipulations	0.10 325.00/hr	32.50
	ARS	Draft, review and revise email to opposing counsel Spataro regarding finalizing exhibit list	0.10 325.00/hr	32.50
	ARS	Review email from opposing counsel Spataro regarding trial documents	0.10 325.00/hr	32.50
	ARS	Draft, review and revise email to opposing counsel Spataro regarding jury instructions	0.10 325.00/hr	32.50
	ARS	Review email from opposing counsel Spataro regarding jury instructions	0.10 325.00/hr	32.50
	ARS	Review email from opposing counsel Spataro regarding updated draft of jury instructions	0.10 325.00/hr	32.50
	ARS	Review and revise draft joint exhibit list	0.30 325.00/hr	97.50
	ARS	Draft, review and revise special verdict form	0.50 325.00/hr	162.50
	ARS	Review and revise opposing counsel Spataro's draft of jury instructions	0.50 325.00/hr	162.50
	ARS	Draft, review and revise joint jury instructions	1.20 325.00/hr	390.00
7/6/2017	RMW	Travel to Tulare	6.00 500.00/hr	3,000.00
	RE	Draft, review and revise exhibit tags	0.20 175.00/hr	35.00
	RE	Draft, review and revise table of contents for trial call binder	0.20 175.00/hr	35.00

		<u>Hrs/Rate</u>	<u>Amount</u>
7/6/2017	RE Prepare exhibits for exhibit binder	1.00 175.00/hr	175.00
	ARS Review and revise exhibit list to change stipulations	0.20 325.00/hr	65.00
	RE Prepare and print documents for trial call binder	0.40 175.00/hr	70.00
	RE Bates Stamp exhibits for exhibit binder	0.60 175.00/hr	105.00
	RE Assemble exhibit binder	0.60 175.00/hr	105.00
	ARS Continue to review and revise joint jury instructions	0.50 325.00/hr	162.50
	RE Prepare and print motions in limine for trial call binder; prepare binder	0.50 175.00/hr	87.50
	RE Print exhibits for exhibit binder	1.00 175.00/hr	175.00
7/7/2017	JRU Draft, review and revise email to Barbara Luna regarding damage calculations	0.10 250.00/hr	25.00
	JRU Draft, review and revise email to Linda Pette regarding damage calculations	0.10 250.00/hr	25.00
	JRU Left voicemail for Department 1 clerk regarding trial logistics	0.10 250.00/hr	25.00
	JRU Phone call with Linda Pette regarding damage calculations	0.10 250.00/hr	25.00
	JRU Phone call with Department 1 clerk regarding trial logistics	0.20 250.00/hr	50.00
	JRU Review and analyze produced documents regarding calculating damages	0.30 250.00/hr	75.00
	JRU Phone call with Client	0.30 250.00/hr	75.00
	JRU Review and analyze case law and statutes regarding use of testimony from a prior lawsuit when witness is unavailable	0.30 250.00/hr	75.00
	RMW Prepare for and attend Motion to Continue and TrialCall; return travel to San Diego	5.00 500.00/hr	2,500.00

			<u>Hrs/Rate</u>	<u>Amount</u>
7/7/2017	JRU	Draft, review and revise email to Linda Pette regarding damage calculations	0.10 250.00/hr	25.00
	JRU	Phone call with Linda Pette regarding damage calculations	0.30 250.00/hr	75.00
	RMW	Review and analyze exhibits; Review and analyze depositions	4.50 500.00/hr	2,250.00
7/8/2017	RE	Prepare and print repair orders for counsel's trial binders	0.10 175.00/hr	17.50
	RE	Assemble exhibit binders for trial	3.80 175.00/hr	665.00
	JRU	Draft, review and revise timeline demonstrative exhibit; prepare exhibit binders	3.90 250.00/hr	975.00
	RE	Print Plaintiff's deposition for trial binder	0.10 175.00/hr	17.50
	RE	Draft, review and revise email to Anthony Micale regarding exhibits for trial	0.10 175.00/hr	17.50
	RE	Draft, review and revise email to opposing counsel regarding exhibits for trial	0.10 175.00/hr	17.50
	RE	Prepare exhibits for exhibit binder; Draft, review and revise cover pages; Draft, review and revise exhibit tags; Bates Stamp Defendant's exhibits	0.50 175.00/hr	87.50
	ARS	Draft, review and revise email to client	0.20 325.00/hr	65.00
	JRU	Draft, review and revise witness outline for direct examination of Mr. Teran	3.10 250.00/hr	775.00
	ARS	Phone call with client	0.60 325.00/hr	195.00
	RMW	Trial prep: Review voir dire questions	0.50 500.00/hr	250.00
	RMW	Trial prep: Review timeline	0.50 500.00/hr	250.00
	RMW	Trial prep: Review jury instructions and Motions in Limine(s)	1.00 500.00/hr	500.00
	RMW	Trial prep: Prepare damage model	1.50 500.00/hr	750.00



		<u>Hrs/Rate</u>	<u>Amount</u>
7/8/2017	RMW Trial prep: Prepare witness	3.50 500.00/hr	1,750.00
	RMW Trial prep: Review and analyze exhibits	4.50 500.00/hr	2,250.00
	RMW Trial prep: Outlines - opening statements	3.50 500.00/hr	1,750.00
	ARS Trial prep: organize exhibits	1.00 325.00/hr	325.00
	ARS Trial prep: create trial binder	2.30 325.00/hr	747.50
	ARS Trial prep: Draft, review and revise trial documents, and email Opposing counsel regarding docs	3.00 325.00/hr	975.00
	ARS Trial prep: Review transcripts of client and Mrs. Teran (highlight and make notes for meeting with Terans)	3.00 325.00/hr	975.00
7/9/2017	RMW Prepare for trial with clients	6.00 500.00/hr	3,000.00
	LBS Draft, review and revise cross examination of McDowell	4.10 250.00/hr	1,025.00
	RMW Trial prep: Work on openings and witness outlines	2.00 500.00/hr	1,000.00
	RMW Travel to Visalia	6.50 500.00/hr	3,250.00
	ARS Trial prep: Draft, review and revise trial documents, draft outlines, organize exhibits, review transcripts	4.50 325.00/hr	1,462.50
	ARS Trial prep: meet with clients	6.00 325.00/hr	1,950.00
	ARS Drive to Visalia	6.50 325.00/hr	2,112.50
7/10/2017	RMW Travel to and from and attend trial	9.00 500.00/hr	4,500.00
	LBS Research and analysis regarding exclusion of experts rules; Draft, review and revise email to Amy Smith and Richard M. Wirtz regarding research	0.60 250.00/hr	150.00
	ARS Prepare for trial day; Draft witness outlines and print trial documents	2.00 325.00/hr	650.00

		<u>Hrs/Rate</u>	<u>Amount</u>
7/10/2017	RE Telephone conference with First Legal Deposition Services regarding Dessier Teran's transcript; Receipt and review email from First Legal Deposition Services regarding same, Draft, review and revise email response	0.20 175.00/hr	35.00
	ARS Travel to and from and attend first day of trial	9.00 325.00/hr	2,925.00
	ARS Prepare for second day of trial; phone call with clients, draft Dessler witness outline, print trial docs	6.00 325.00/hr	1,950.00
	RMW Trial prep: review and revise witness outlines	3.00 500.00/hr	1,500.00
	RMW Prepare for next day's trial; draft, review and revise witness outlines, work with witnesses	6.00 500.00/hr	3,000.00
7/11/2017	RMW Travel to and from and attend trial	9.00 500.00/hr	4,500.00
	RMW Prepare for next day's trial; draft, review and revise witness outlines, work with witnesses	5.60 500.00/hr	2,800.00
	EKB Telephone conference with Amy Smith regarding filing a writ regarding ruling on MIL 3; Research and analysis regarding same; Telephone conference with Jessica Underwood regarding same; Exchange emails with Jessica Underwood regarding same; Telephone conference with Richard M. Wirtz regarding same	1.40 325.00/hr	455.00
	ARS Prepare for second day of trial: finalize outlines, trial documents, trial brief regarding Plaintiff's experts	3.00 325.00/hr	975.00
	RE Draft, review and revise email to Jen Mullenix regarding Defendant's Motions in Limine; Receipt and review response; Save documents to file	0.10 175.00/hr	17.50
	ARS Travel to and from and attend day 2 trial	9.00 325.00/hr	2,925.00
	JRU Draft, review and revise writ for immediate stay	2.60 250.00/hr	650.00
	ARS Prepare for third day of trial; meet with expert Anthony Micale, attend Anthony Micale deposition, meet with expert Barbara Luna	5.00 325.00/hr	1,625.00
	RMW Prepare for day's trial; draft, review and revise witness examinations; prepare closing statement	2.50 500.00/hr	1,250.00
7/12/2017	RMW Travel to and from and attend trial	9.00 500.00/hr	4,500.00

		<u>Hrs/Rate</u>	<u>Amount</u>
7/12/2017	RMW Prepare for next day's trial; draft, review and revise closing statement	5.90 500.00/hr	2,950.00
	RE Research format of writ and format of record regarding writ; Draft, review and revise table of contents for writ	1.70 175.00/hr	297.50
	EKB Draft, review and revise writ; Research and analysis regarding same; Telephone conference with Amy Smith regarding same	4.10 325.00/hr	1,332.50
	LBS Draft, review and revise chronology for writ; Telephone conference with Senior associate attorney Erin Barns regarding chronology for writ;	1.90 250.00/hr	475.00
	ARS Prepare for fourth day of trial: help to draft closing, create powerpoint, finalize verdict form and jury instructions with opposing counsel Shepardson	5.00 325.00/hr	1,625.00
	ARS Travel to and from and attend third day of trial	9.00 325.00/hr	2,925.00
	RE Telephone conference with clerk regarding trial readiness conference transcript; Telephone message to court reporter regarding same	0.10 175.00/hr	17.50
	RE Telephone conference with court reporter regarding trial readiness conference transcript; Receipt and review email from court reporter regarding same; Draft, review and revise email to Amy Smith regarding same; Save transcript to file	0.20 175.00/hr	35.00
	RMW Prepare for day's trial	2.20 500.00/hr	1,100.00
	EKB Telephone conference with Richard M. Wirtz regarding status and writ	0.10 325.00/hr	NO CHARGE
	EKB Telephone conference with Amy Smith regarding scheduling trial	0.10 325.00/hr	NO CHARGE
	EKB Receive and review emails from Richard M. Wirtz and Amy Smith with transcripts for writ record; Draft, review and revise response	0.10 325.00/hr	NO CHARGE
7/13/2017	RMW Travel to and from and attend trial	9.00 500.00/hr	4,500.00
	ARS Drive back to San Diego from Visalia	6.70 325.00/hr	2,177.50
	RMW Drive to San Diego	6.70 500.00/hr	3,350.00
	ARS Travel to and from and attend attend fourth day of trial	9.00 325.00/hr	2,925.00

		<u>Hrs/Rate</u>	<u>Amount</u>
7/16/2017	RMW Drive to Visalia	8.00 500.00/hr	4,000.00
7/17/2017	RMW Travel to and from and attend trial (verdict deliberation)	7.00 500.00/hr	3,500.00
	RMW Drive to San Diego	7.00 500.00/hr	3,500.00
	ARS Phone call with client	0.10 325.00/hr	32.50
7/18/2017	ARS Draft, review and revise message to client	0.10 325.00/hr	32.50
	ARS Review message from client	0.10 325.00/hr	32.50
	ARS Draft, review and revise letters for Dominic and Dessier	0.50 325.00/hr	162.50
	ARS Review message from client	0.10 325.00/hr	32.50
7/19/2017	RE Receipt and review email from Roselen Mills regarding the final transcript from trial 7/7/17; Save documents to file	0.10 175.00/hr	17.50
7/27/2017	ARS Draft, review and revise notice of judgment, final verdict form to attach	1.00 325.00/hr	325.00
8/1/2017	RE Prepare, file, and serve Proposed Judgment on Jury Verdict; Draft, review and revise proof(s) of service	0.20 175.00/hr	35.00
	ARS Review and revise proposed judgment, finalize for filing	0.20 325.00/hr	65.00
8/2/2017	RE Telephone conference with court clerk regarding trial transcript; Telephone message to court reporter regarding same	0.20 175.00/hr	35.00
8/23/2017	JRU Review Anthony Micale's trial testimony	1.30 250.00/hr	325.00
8/24/2017	JRU Review Micale's testimony at trial for summarization	1.90 250.00/hr	475.00
9/11/2017	RMW Receive and review notice of entry of judgment	0.10 500.00/hr	50.00
9/20/2017	ARS Draft, review and revise email to client regarding status of recovery	0.10 325.00/hr	32.50

		<u>Hrs/Rate</u>	<u>Amount</u>
9/20/2017	ARS Review email from client regarding status of recovery	0.10 325.00/hr	32.50
9/22/2017	RMW Emails with Guadalupe regarding drafting of fees motion	0.10 500.00/hr	50.00
9/26/2017	RMW Receive and review memo of costs	0.10 500.00/hr	50.00
10/4/2017	RE Receive and review email from co-counsel with W9 form for court reporter; Draft, review and revise email to court reporter with W9	0.10 175.00/hr	17.50
	RE Receive and review email from court reporter regarding invoice for transcript; Draft, review and revise email to co-counsel regarding payment	0.10 175.00/hr	17.50
10/17/2017	ARS Draft, review and revise motion for prejudgment interest, declaration, and proposed order	4.00 325.00/hr	1,300.00
11/8/2017	ARS Review email and text message from client regarding status	0.10 325.00/hr	32.50
	ARS Draft, review and revise email to client regarding case status	0.10 325.00/hr	32.50