

DATE	NAME	DESCRIPTION	HOURS	RATE	TOTAL
17.04.14	MR	Received and reviewed request to associate as trial counsel; received and reviewed pleadings and discovery; teleconference with client regarding assignment of case	2.50	\$500.00	\$1,250.00
17.04.27	RH	Reviewed and analyzed client file in preparation to draft motions in limine; reviewed local rules of the court; reviewed Department rules; reviewed Court's orders	1.50	\$275.00	\$412.50
17.04.27	RH	Drafted Plaintiff's motion in limine number 1; drafted declaration regarding the same; drafted proposed order on the same	1.00	\$275.00	\$275.00
17.04.27	RH	Drafted Plaintiff's motion in limine number 2; drafted declaration regarding the same; drafted proposed order on the same	0.75	\$275.00	\$206.25
17.04.27	RH	Drafted Plaintiff's motion in limine number 3; drafted declaration regarding the same; drafted proposed order on the same	0.75	\$275.00	\$206.25
17.04.27	RH	Drafted Plaintiff's motion in limine number 4; drafted declaration regarding the same; drafted proposed order on the same	1.00	\$275.00	\$275.00
17.04.27	RH	Drafted Plaintiff's motion in limine number 5; drafted declaration regarding the same; drafted proposed order on the same	0.75	\$275.00	\$206.25
17.04.27	RH	Drafted Plaintiff's motion in limine number 6; drafted declaration regarding the same; drafted proposed order on the same	1.00	\$275.00	\$275.00
17.04.27	RH	Drafted Plaintiff's motion in limine number 7; drafted declaration regarding the same; drafted proposed order on the same	0.75	\$275.00	\$206.25
17.04.27	RH	Drafted Plaintiff's motion in limine number 8; drafted declaration regarding the same; drafted proposed order on the same	0.75	\$275.00	\$206.25
17.04.28	RH	Drafted Plaintiff's motion in limine number 9; drafted declaration regarding the same; drafted proposed order on the same	0.50	\$275.00	\$137.50
17.04.28	RH	Drafted Plaintiff's motion in limine number 10; drafted declaration regarding the same; drafted proposed order on the same	0.75	\$275.00	\$206.25

DATE	NAME	DESCRIPTION	HOURS	RATE	TOTAL
17.04.28	RH	Drafted Plaintiff's motion in limine number 11; drafted declaration regarding the same; drafted proposed order on the same	1.00	\$275.00	\$275.00
17.04.28	RH	Drafted Plaintiff's motion in limine number 12; drafted declaration regarding the same; drafted proposed order on the same	1.00	\$275.00	\$275.00
17.04.28	RH	Drafted Plaintiff's motion in limine number 13; drafted declaration regarding the same; drafted proposed order on the same	1.25	\$275.00	\$343.75
17.04.28	RH	Drafted Plaintiff's motion in limine number 14; drafted declaration regarding the same; drafted proposed order on the same	1.00	\$275.00	\$275.00
17.04.28	RH	Drafted Plaintiff's motion in limine number 15; drafted declaration regarding the same; drafted proposed order on the same	1.00	\$275.00	\$275.00
17.04.28	MR	Reviewed and revised Plaintiff's motions in limine; directed associate attorney regarding the same	1.25	\$500.00	\$625.00
17.04.28	RH	Finalized Plaintiff's motions in limine for service and filing; directed staff regarding service and filing of Plaintiff's motions in limine	1.00	\$275.00	\$275.00
17.04.28	MR	Read and summarize Plaintiff's deposition; review depo transcript and outline Plaintiff's trial direct examination outline	3.50	\$500.00	\$1,750.00
17.05.08	RH	Reviewed paralegal's notes regarding dealership personnel in preparation to draft notices to appear at trial and trial subpoenas	0.50	\$275.00	\$137.50
17.05.08	RH	Drafted 1987 (b) (c) Notice to Appear at Trial for Defendant FCA	0.50	\$275.00	\$137.50
17.05.08	RH	Drafted Trial Subp for Glendora Dodge Chrysler Jeep Ram PMQ, and on-call agreement for the same	0.25	\$275.00	\$68.75
17.05.08	RH	Drafted Trial Subp for Glendora Dodge Chrysler Jeep Ram SA 851, and on-call agreement for the same	0.25	\$275.00	\$68.75
17.05.08	RH	Drafted Trial Subp for Glendora Dodge Chrysler Jeep Ram SA "Chuck", and on-call agreement for the same	0.25	\$275.00	\$68.75
17.05.08	RH	Drafted Trial Subp for Glendora Dodge Chrysler Jeep Ram SA "Rick", and on-call agreement for the same	0.25	\$275.00	\$68.75
17.05.08	RH	Drafted Trial Subp for Glendora Dodge Chrysler Jeep Ram Tech 846, and on-call agreement for the same	0.25	\$275.00	\$68.75
17.05.08	RH	Drafted Trial Subp for Glendora Dodge Chrysler Jeep Ram tech 863, and on-call agreement for the same	0.25	\$275.00	\$68.75
17.05.08	RH	Drafted Trial Subp for Glendora Dodge Chrysler Jeep Ram Tech 867, and on-call agreement for the same	0.25	\$275.00	\$68.75
17.05.08	RH	Drafted Trial Subp for Browning Dodge Chrysler Jeep Ram PMQ and on call agreement for the same	0.25	\$275.00	\$68.75
17.05.08	RH	Drafted Trial Subp for Browning Dodge Chrysler Jeep Ram SA 9247 Maximono Llamas and on call agreement for the same	0.25	\$275.00	\$68.75
17.05.08	RH	Drafted Trial Subp for Browning Dodge Chrysler Jeep Ram Tech 9012 and on call agreement for the same	0.25	\$275.00	\$68.75
17.05.08	RH	Drafted Trial Subp for Browning Dodge Chrysler Jeep Ram Tech 9156 and on call agreement for the same	0.25	\$275.00	\$68.75
17.05.08	RH	Finalized trial subpoenas and notices to appear at trial for service; directed staff regarding service of the same	0.50	\$275.00	\$137.50

DATE	NAME	DESCRIPTION	HOURS	RATE	TOTAL
17.05.08	MR	Review pleadings on Concealment; repair history of claims and TIPM related issues; review Velasco class action materials/discovery for case salient documents for expert and outline on fraud claims; Trail exhibit binder outline and compilation	2.75	\$500.00	\$1,375.00
17.05.08	BM	Reviewed local rules regarding trial documents; reviewed local Department rules regarding the same; reviewed court orders regarding the same; reviewed Court's docket	0.75	\$350.00	\$262.50
17.05.08	BM	Met and conferred with opposing counsel regarding joint trial documents	0.25	\$350.00	\$87.50
17.05.08	BM	Reviewed and analyzed client file in preparation to draft joint trial documents; reviewed pleadings; reviewed discovery and document production; reviewed depositions and deposition notices	1.50	\$350.00	\$525.00
17.05.08	BM	Drafted joint statement of the case	0.75	\$350.00	\$262.50
17.05.08	BM	Drafted joint statement of stipulated facts	0.50	\$350.00	\$175.00
17.05.08	BM	Drafted joint witness list	0.75	\$350.00	\$262.50
17.05.08	BM	Drafted joint list of jury instructions	0.50	\$350.00	\$175.00
17.05.08	BM	Drafted CACI jury instructions	1.50	\$350.00	\$525.00
17.05.08	BM	Drafted Plaintiff's special jury instructions	0.50	\$350.00	\$175.00
17.05.08	BM	Drafted proposed special verdict form-express warranty	0.75	\$350.00	\$262.50
17.05.08	BM	Drafted proposed special verdict form-implied warranty	0.50	\$350.00	\$175.00
17.05.08	BM	Drafted proposed special verdict form-Concealment	0.75	\$350.00	\$262.50
17.05.08	BM	Reviewed documents provided by client; reviewed documents produced in connection with written discovery; reviewed document produced in connection with depositions	1.25	\$350.00	\$437.50
17.05.08	BM	Gathered, organized and serially numbered documents for use as trial exhibits	1.00	\$350.00	\$350.00
17.05.08	BM	Drafted exhibit list	0.75	\$350.00	\$262.50
17.05.08	MR	Reviewed and revised Plaintiff's proposed trial documents; directed associate attorney regarding the same	1.00	\$500.00	\$500.00
17.05.08	BM	Met and conferred with opposing counsel regarding joint trial documents	0.25	\$350.00	\$87.50
17.05.09	RH	Received and reviewed Defendant's motion in limine no. 1; saved the same to client's file	0.50	\$275.00	\$137.50
17.05.09	RH	Drafted Plaintiff's opposition to Defendant's motion in limine no. 1	1.00	\$275.00	\$275.00
17.05.09	RH	Received and reviewed Defendant's motion in limine no. 2; saved the same to client's file	0.50	\$275.00	\$137.50
17.05.09	RH	Drafted Plaintiff's opposition to Defendant's motion in limine no. 2	0.75	\$275.00	\$206.25
17.05.09	RH	Received and reviewed Defendant's motion in limine no. 3; saved the same to client's file	0.50	\$275.00	\$137.50
17.05.09	RH	Drafted Plaintiff's opposition to Defendant's motion in limine no. 3	1.25	\$275.00	\$343.75
17.05.09	RH	Received and reviewed Defendant's motion in limine no. 4; saved the same to client's file	0.50	\$275.00	\$137.50
17.05.09	RH	Drafted Plaintiff's opposition to Defendant's motion in limine no. 4	1.00	\$275.00	\$275.00
17.05.09	MR	Reviewed and revised Plaintiff's oppositions to Defendant's motions in limine; directed associate attorney regarding the same	0.75	\$500.00	\$375.00

DATE	NAME	DESCRIPTION	HOURS	RATE	TOTAL
17.05.09	RH	Finalized Plaintiff's oppositions to Defendant's motions in limine for service and filing; directed staff regarding service and filing of the same	0.75	\$275.00	\$206.25
17.05.09	MR	Reviewed paralegal's notes regarding trial scheduling and deadlines; reviewed courtroom rules and local rules regarding the same, reviewed client file in preparation for trial	1.00	\$500.00	\$500.00
17.05.10	BM	Met and conferred with opposing counsel regarding joint trial documents	0.25	\$350.00	\$87.50
17.05.16	BM	Met and conferred with opposing counsel regarding joint trial documents	0.25	\$350.00	\$87.50
17.05.17	BM	Received and reviewed email from opposing counsel re joint trial documents; replied re same	0.25	\$350.00	\$87.50
17.05.17	RH	Prepared to conduct dealership depositions; reviewed and analyzed repair orders; reviewed paralegal's notes on the same	1.25	\$275.00	\$343.75
17.05.17	RH	Drafted deposition outlines for Browning Dodge Jeep Ram dealership depositions	1.50	\$275.00	\$412.50
17.05.17	RH	Gathered, organized and prepared exhibits for Browning Dodge Jeep Ram dealership depositions	1.00	\$275.00	\$275.00
17.05.18	RH	Travelled to Browning Dodge Jeep Ram dealership depositions; conducted depositions; return travel	7.00	\$275.00	\$1,925.00
17.05.18	RH	Drafted summary of Browning Dodge dealership depositions; directed staff and co-counsel regarding the same	0.50	\$275.00	\$137.50
17.05.18	JM	Received and reviewed Plaintiff's ex parte application to continue trial; prepared for oral argument on the same	0.75	\$275.00	\$206.25
17.05.19	JM	Travelled to Plaintiff's ex parte hearing to continue trial; attended hearing on the same; return travel	3.50	\$275.00	\$962.50
17.05.19	JM	Drafted summary of Plaintiff's ex parte hearing; directed staff and co-counsel regarding the same	0.25	\$275.00	\$68.75
17.05.19	RH	Prepared to conduct Glendora Dodge Chrysler Jeep Ram dealership depositions; reviewed and analyzed repair orders; reviewed paralegal's notes on the same	1.25	\$275.00	\$343.75
17.05.19	RH	Drafted deposition outlines for Glendora Dodge Chrysler Jeep Ram dealership depositions	1.50	\$275.00	\$412.50
17.05.19	RH	Gathered, organized and prepared exhibits for Glendora Dodge Chrysler Jeep Ram dealership depositions	1.00	\$275.00	\$275.00
17.05.20	RH	Travelled to Glendora Dodge Chrysler Jeep Ram dealership depositions; conducted depositions; return travel	8.00	\$275.00	\$2,200.00
17.05.20	RH	Drafted summary of Glendora Dodge Chrysler Jeep Ram dealership depositions; directed staff and co-counsel regarding the same	0.50	\$275.00	\$137.50
17.8.17	MR	Reviewed and analyzed client file in preparation to conduct deposition of FCA's PMK	1.50	\$500.00	\$750.00
17.8.17	MR	Gathered, organized and prepared exhibits for deposition of FCA's PMK	1.00	\$500.00	\$500.00
17.8.17	MR	Drafted deposition outline for FCA's PMK's depositions	1.25	\$500.00	\$625.00
17.8.18	MR	Travelled to depositions of FCA's PMK; deposed FCA's PMK; return travel	2.50	\$500.00	\$1,250.00