11/29/2017 RMW	Recieve and review RO summary	0.30 500.00/hr	NO CHARGE
12/26/2017 RMW	Recieve and sign notice of association	0.10 500.00/hr	NO CHARGE
1/4/2018 R M W	Review and analyze case file	2.50 575.00/hr	1,437.50
1/23/2018 DW	Draft email to co-counsel	0.10 175.00/hr	NO CHARGE
1/29/2018 DW	Draft, review and revise plaintiff's objections to defendant's Notice of Deposition for plaintiff	0.40 175.00/hr	70.00
2/1/2018 DW	Edit and finalize plaintiff's objections to defendants Notice of Deposition and Request for production of docs for plaintiff	0.20 175.00/hr	35.00
DW	Email nationwide process servers plaintiff's objections to defendants' Notice of Deposition and request for production documents for plaintiff to be served on defendants	0.10 175.00/hr	NO CHARGE
2/2/2018 DW	Draft, review and revise plaintiff's expert designation for Micale	0.30 175.00/hr	52.50
2/6/2018 DW	Email opposing counsel regarding plaintiff's availability for his deposition(s) and Vehicle Inspection	0.10 175.00/hr	17.50
2/19/2018 DW	Client communication	0.20 175.00/hr	35.00

Hrs/Rate

Amount

		Hrs/Rate	Amount
2/19/2018 JRU	Draft, review and revise Plaintiff's Mandatory Settlement Conference brief; Review repair orders to compile summary table; Review CAIR logs regarding Plaintiff's contacts with FCA; Review prior settlement offer and demand	2.60 350.00/hr	910.00
2/20/2018 DW	Email opposing counsel regarding rescheduling plaintiff's deposition for 2/21/2018 due to plaintiff no longer being available on that date.	0.10 175.00/hr	17.50
RE	Prepare, file, and serve Plaintiff's Mandatory Settlement Conference Statement; Draft, review and revise proof(s) of service; Draft, review and revise email to Nationwide regarding service; Serve same	0.20 175.00/hr	35.00
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	0.30 175.00/hr	52.50
2/23/2018 JRU	Client communication	1.50 350.00/hr	525.00
2/26/2018 RE	Telephone message to clerk regarding trial counsel unable to appear for Mandatory Settlement Conference and another attorney will be specially appearing	0.10 175.00/hr	17.50
JRU	Telephone conference with co-counsel	0.50 f 350.00/hr	NO CHARGE
3/1/2018 RE	Draft, review and revise Plaintiff's Notice of Deposition of FCA's Expert; Draft, review and revise proof(s) of service; Draft, review and revise email to Nationwide regarding service; Serve same	0.20 175.00/hr	35.00
3/5/2018 DW	Draft, review and revise plaintiff's objections to defendants' Notice of Vehicle Inspection and proof(s) of service	0.20 175.00/hr	35.00
DW	Draft, review and revise plaintiff's objection to Notice of Deposition of Fabiola Ruvalcaba for 3/6/2018	0.10 175.00/hr	17.50
DW	Client communication	0.20 175.00/hr	35.00
DW	Client communication	0.20 175.00/hr	35.00
DW	Email opposing counsel plaintiff's objections to defendants' Notice of Vehicle Inspection and request an amended notice for the time mutually agreed upon	0.10 N 175.00/hr	NO CHARGE
DW	Email nationwide process servers plaintiff's objection to defendants' notice of Vehicle Inspection for 3.8.18 to be served on opposing counsel	0.10 N 175.00/hr	NO CHARGE

		Hrs/Rate	Amount
3/5/2018 DW	Email nationwide process servers plaintiff's objection to defendant's Notice of Deposition for Fabiola Ruvalcaba for 3/6/2018 and proof(s) of service	0.10 175.00/hr	NO CHARGE
3/6/2018 RE	Draft, review and revise Amended Notice of Deposition of FCA's Expert; Draft, review and revise proof(s) of service; Draft, review and revise email to Nationwide regarding service; Serve same	0.20 175.00/hr	35.00
RMV	Travel to and from and attend deposition of Fabiola Cuevas	9.00 575.00/hr	5,175.00
JRU	Draft, review and revise opposition to Defendant's ex parte application regarding protective order for Vehicle Inspection issues	3.40 350.00/hr	1,190.00
3/7/2018 RE	Draft, review and revise Amended Notice of Deposition of FCA Expert; Draft, review and revise proof(s) of service; Draft, review and revise email to Nationwide regarding service; Serve same	0.20 175.00/hr	35.00
RE	Draft, review and revise email to opposing counsel regarding Anthony Micale's timely served designation; Receive and review email from opposing counsel regarding same	0.20 175.00/hr	35.00
RE	Draft, review and revise email to opposing counsel regarding scheduling FCA's expert's deposition and Plaintiff's experts availability; Draft, review and revise email to opposing counsel regarding same	0.20 175.00/hr	35.00
JRU	Prepare for and appear via CourtCall for Defendant's ex parte application hearing regarding protective order for Vehicle Inspection	2.00 350.00/hr	700.00
3/8/2018 RE	Receive and review email from opposing counsel regarding stipulation to hear motions on same day; Draft, review and revise email to opposing counsel regarding signed stipulation	0.20 175.00/hr	35.00
ARS	Review and sign stipulation to hear motions on same day	0.20 375.00/hr	75.00
LBV	Travel to and from and attend vehicle inspection	8.20 350.00/hr	2,870.00
3/9/2018 RE	Review file and create sharefile; Draft, review and revise email to opposing counsel regarding Anthony Micale's expert file	0.20 175.00/hr	35.00
RE	Review file and create sharefile; Draft, review and revise email to opposing counsel regarding case documents	0.20 175.00/hr	35.00
JRU	Draft, review and revise opposition to Defendant's motion for Vehicle Inspection protective order; complete additional legal research and analyze controlling law	3.80 350.00/hr	1,330.00

		Hrs/Rate	Amount
3/9/2018 LBV	Draft, review and revise email to co-counsel	0.50 350.00/hr	175.00
3/10/2018 JRU	Telephone calls with Anthony Micale regarding Vehicle Inspection data issues; Draft, review and revise expert declaration	3.60 350.00/hr	1,260.00
3/11/2018 JRU	Telephone calls with Darrell Blasjo regarding Vehicle Inspection data issues; Draft, review and revise expert declaration	3.20 350.00/hr	1,120.00
3/12/2018 RE	Prepare, file, and serve Plaintiff's Opposition to Defendants Motion for Protective Order regarding Vehicle Inspection; Draft, review and revise proof(s) of service; Draft, review and revise email to nationwide regarding service; Serve same	0.20 175.00/hr	35.00
RE	Draft, review and revise email to opposing counsel regarding Plaintiff's Opposition to Defendant's Motion for Protective Order	0.20 175.00/hr	35.00
3/13/2018 RE	Receive and review email from Anthony Micale regarding remaining documents for his expert file; Save documents to file	0.20 175.00/hr	35.00
RE	Draft, review and revise email to opposing counsel regarding Anthony Micale's remaining documents for his expert file	0.20 175.00/hr	35.00
RMW	/ Attend Deposition of Micale	3.00 575.00/hr	1,725.00
3/14/2018 RMW	Review and annotate trial exhibits	3.50 575.00/hr	2,012.50
3/15/2018 RE	Draft, review and revise email to opposing counsel regarding Defendant's additions to the joint trial documents	0.10 175.00/hr	17.50
RE	Prepare draft of Joint Pretrial Statement	0.20 175.00/hr	35.00
RE	Prepare draft of Joint Witness List	0.20 175.00/hr	35.00
RE	Prepare and serve Plaintiff's Motions in Limine 1-14; Draft, review and revise proof(s) of service; Draft, review and revise email to opposing counsel regarding service; Serve same	0.40 175.00/hr	70.00
RE	Receive and review email from Darrell Blasjo regarding his expert file; Save documents to file	0.10 175.00/hr	17.50
RE	Prepare draft of Joint Statement of the Case	0.20 175.00/hr	35.00
RE	Prepare draft of Joint Exhibit List; Review file and pull exhibits for trial	1.00 175.00/hr	175.00

		Hrs/Rate	Amount
3/15/2018 RE	Prepare Plaintiff's Motions in Limine 1-14	1.00 175.00/hr	175.00
RE	Prepare draft of Joint Non Controverted Issues	0.10 175.00/hr	17.50
RE	Prepare draft of Joint Jury Instructions	0.20 175.00/hr	35.00
RE	Prepare draft of Plaintiff's Special Jury Instructions	0.30 175.00/hr	52.50
ARS	Review and revise Plaintiff's Special Jury Instructions	0.20 375.00/hr	75.00
ARS	Review and revise Joint Non Controverted Issues	0.20 375.00/hr	75.00
ARS	Review and revise Joint Exhibit List	0.20 375.00/hr	75.00
ARS	Review and revise Joint Pretrial Statement	0.20 375.00/hr	75.00
ARS	Review and revise Joint Witness List	0.20 375.00/hr	75.00
ARS	Review and revise Joint Jury Instructions	0.50 375.00/hr	187.50
JRU	Review and revise Plaintiff's Motions in Limine 6	0.50 350.00/hr	175.00
JRU	Review and revise Plaintiff's Motions in Limine 7	0.50 350.00/hr	175.00
JRU	Review and revise Plaintiff's Motions in Limine 8	0.50 350.00/hr	175.00
JRU	Review and revise Plaintiff's Motions in Limine 9	0.50 350.00/hr	175.00
JRU	Review and revise Plaintiff's Motions in Limine 10	0.50 350.00/hr	175.00
JRU	Review and revise Plaintiff's Motions in Limine 11	0.50 350.00/hr	175.00
JRU	Review and revise Plaintiff's Motions in Limine 12	0.50 350.00/hr	175.00

		Hrs/Rate	Amount
3/15/2018 JRU	Review and revise Plaintiff's Motions in Limine 13	0.50 350.00/hr	175.00
JRU	Review and revise Plaintiff's Motions in Limine 14	0.50 350.00/hr	175.00
ARS	Review and revise Joint Statement of the Case	0.20 375.00/hr	75.00
JRU	Review and revise Plaintiff's Motions in Limine 1	0.50 350.00/hr	175.00
JRU	Review and revise Plaintiff's Motions in Limine 2	0.50 350.00/hr	175.00
JRU	Review and revise Plaintiff's Motions in Limine 3	0.50 350.00/hr	175.00
JRU	Review and revise Plaintiff's Motions in Limine 4	0.50 350.00/hr	175.00
JRU	Review and revise Plaintiff's Motions in Limine 5	0.50 350.00/hr	175.00
3/19/2018 RE	Draft, review and revise email to Darrell Blasjo regarding Notice of Deposition	0.20 175.00/hr	35.00
LBV	Review file in preparation for deposition of Blasjo this week	0.30 350.00/hr	105.00
3/20/2018 RE	Receive and review email from Defendant's regarding ex parte application; Save documents to file; Draft, review and revise email to opposing counsel regarding Plaintiff's intent to oppose	0.20 175.00/hr	35.00
LBV	Travel to and from and attend deposition of Darrell Blasjo	8.50 350.00/hr	2,975.00
3/21/2018 JRU	Appear via CourtCall for Defendant's Ex Parte Application regarding Person most knowledgeable deposition scheduling	1.50 350.00/hr	525.00
3/22/2018 RE	Receive and review email from Phillip Reznik regarding Notice of Deposition of Barbara Luna; Draft, review and revise email to Phillip regarding same	0.20 175.00/hr	35.00
RE	Draft, review and revise follow up email to opposing counsel regarding Defendant's additions to the joint trial documents	0.20 175.00/hr	35.00
RE	Draft, review and revise Second Amended Notice of Deposition of FCA Expert; Draft, review and revise proof(s) of service; Draft, review and revise email to opposing counsel regarding service	0.20 175.00/hr	35.00

			Hrs/Rate	Amount
3/22/2018	RE	Receive and review email from Linda Pette regarding changing location of Barbara's deposition; Draft, review and revise email to Linda regarding same	0.10 175.00/hr	NO CHARGE
	RE	Draft, review and revise email to opposing counsel regarding changing location of FCA experts' and Barbara's depositions; Receive and review email from opposing counsel confirming change	0.10 175.00/hr	NO CHARGE
	RE	Draft, review and revise email to Atkinson Baker regarding scheduling court reporter for FCA Expert deposition	0.10 175.00/hr	NO CHARGE
	RE	Receive and review email from Phillip Reznik regarding time and location of Barbara's deposition, Draft, review and revise email regarding same	0.10 175.00/hr	NO CHARGE
3/23/2018	RE	Receive and review email from Linda Pette regarding Notice of Deposition of Barbara Luna; Draft, review and revise email to Linda regarding same	0.20 175.00/hr	35.00
	RE	Receive and review email from Phillip Reznik regarding Barbara Luna's expert file; Save to file	0.20 175.00/hr	35.00
	SLA	Draft, review and revise damages model	1.00 175.00/hr	175.00
	RE	Draft, review and revise email to opposing counsel regarding Barbara Luna's expert file and Plaintiff's exhibits 101-324	0.20 175.00/hr	35.00
	RE	Draft, review and revise email to Atkinson Baker regarding scheduling a court reporter for FCA's expert deposition	0.10 175.00/hr	NO CHARGE
3/26/2018	RE	Draft, review and revise follow up email to opposing counsel regarding Defendant's additions to the joint trial documents	0.20 175.00/hr	35.00
3/27/2018	RE	Receive and review email from opposing counsel regarding Defendant's additions to the joint trial documents; Save documents to the file	0.20 175.00/hr	35.00
	RE	Review and revise Joint Exhibit List after Defendant's revisions	0.20 175.00/hr	35.00
	RE	Review and revise Joint Witness List after Defendant's revisions	0.20 175.00/hr	35.00
	RE	Review and revise Joint List of Non Controverted Issues after Defendant's revisions	0.20 175.00/hr	35.00
	RE	Review and revise Joint Statement of the Case after Defendant's revisions	0.20 175.00/hr	35.00
	RE	Draft, review and revise email to opposing counsel regarding clean versions of the joint trial documents for signature	0.20 175.00/hr	35.00

		Hrs/Rate	Amount
3/28/2018 RE	Receive and review email from opposing counsel regarding Defendant's revisions to the Jury Instructions and Joint Pretrial Statement; Save drafts to file	0.20 175.00/hr	35.00
RE	Receive and review email from opposing counsel regarding accepted changes to the joint trial documents; Draft, review and revise email to opposing counsel regarding all joint documents for signature	0.20 175.00/hr	35.00
RE	Client Communication	0.20 175.00/hr	35.00
RE	Client Communication	0.20 175.00/hr	35.00
RE	Receive and review email from opposing counsel regarding signed Joint Trial Documents; Save to file	0.20 175.00/hr	35.00
RE	Prepare and serve Joint Trial Documents; Draft, review and revise email to proof(s) of service; Draft, review and revise email to opposing counsel regarding service	0.20 175.00/hr	35.00
RE	Draft, review and revise email to opposing counsel regarding clean versions of the joint jury instructions and joint pretrial statement for signature	0.20 175.00/hr	35.00
ARS	Review and revise Joint Pretrial Statement after Defendant's revisions	0.20 375.00/hr	75.00
ARS	Travel to and from and attend deposition of Jeff Richards in Los Angeles (split with other case)	2.50 375.00/hr	937.50
ARS	Review and revise Joint Jury Instructions after Defendant's revisions	0.30 375.00/hr	112.50
3/29/2018 ARS	Travel to and from and attend Mandatory Settlement Conference and trial call in Riverside	7.00 375.00/hr	2,625.00
4/9/2018 LBV	Prepare for deposition of Luna tomorrow	0.50 350.00/hr	175.00
4/10/2018 LBV	Travel to and from and attend deposition of Barbara Luna	9.00 350.00/hr	3,150.00
4/18/2018 DW	Download and save to file deposition transcript of Jeff Richards	0.20 175.00/hr	35.00
6/25/2018 LBV	Audit fees and costs invoices	2.00 N 350.00/hr	O CHARGE

		Hrs/Rate	Amount
6/29/2018 LBV	Draft, review and revise motion for prejudgment interest	6.00 350.00/hr	2,100.00
7/5/2018 LBV	Draft, review and revise costs invoice; Draft, review and revise ex parte for 473(b) relief	1.80 350.00/hr	630.00
7/6/2018 LBV	Draft, review and revise ex parte for 473(b) relief, declaration of ARS, proposed order	3.80 350.00/hr	1,330.00
7/9/2018 ARS	Review and revise ex parte for 473b relief for untimely memorandum of costs, declaration of Associate attorney Amy Smith R Smith in support, and proposed order	1.50 375.00/hr	562.50
7/10/2018 RE	Prepare, file, and serve Plaintiff's Ex Parte Application for 473(b) Relief, Declaration of Associate attorney Amy Smith, Proposed Order; Draft, review and revise proof(s) of service; Draft, review and revise email to opposing counsel regarding service	0.20 175.00/hr	35.00
RE	Review and revise Plaintiff's Ex Parte Application for 473(b) Relief	0.40 175.00/hr	70.00
7/17/2018 RE	Prepare draft of Declaration of Associate attorney Amy Smith in support of Plaintiff's Motion to Tax Costs	0.20 175.00/hr	35.00
RE	Prepare draft of Plaintiff's Motion to Tax Costs	1.00 175.00/hr	175.00
RE	Prepare draft of Proposed Order for Plaintiff's Motion to Tax Costs	0.20 175.00/hr	35.00
7/18/2018 RE	Prepare, file, and serve Plaintiff's Motion to Tax Costs, Declaration of Associate attorney Amy Smith, Proposed Order; Draft, review and revise proof(s) of service; Draft, review and revise email to Nationwide regarding service	0.30 175.00/hr	52.50
ARS	Review and revise Plaintiff's Motion to Tax Costs	0.50 375.00/hr	187.50
ARS	Review and revise Declaration of Associate attorney Amy Smith in support of Plaintiff's Motion to Tax Costs	0.20 375.00/hr	75.00
8/7/2018 LBV	Draft, review and revise opposition to motion for jnov	6.10 350.00/hr	2,135.00
8/8/2018 LBV	Draft, review and revise opposition to motion for jnov; Draft, review and revise 403(b) ex parte motion	7.70 350.00/hr	2,695.00
8/9/2018 RE	Reserve Plaintiff's Ex Parte hearing for 473(a) Relief	0.10 175.00/hr	17.50

		Hrs/Rate	Amount
8/9/2018 RE	Prepare, file, and serve Plaintiff's Opposition to FCA's Motion for JNOV, Declaration of associate attorney Amy Smith, and Proposed Order; Draft, review and revise proof(s) of service; Draft, review and revise email to nationwide regarding service	0.30 175.00/hr	52.50
RE	Draft, review and revise email to opposing counsel regarding Notice of Plaintiff's Ex Parte regarding 473(b) Relief	0.10 175.00/hr	17.50
8/10/2018 RE	Prepare, file, and serve Plaintiff's Ex Parte regarding 473(b) Relief and Declaration of Associate attorney Amy Smith; Draft, review and revise proof(s) of service; Draft, review and revise email to Nationwide regarding service	0.30 175.00/hr	52.50
JRU	Review and revise Declaration of associate attorney Amy Smith in support of Plaintiff's Ex Parte regarding 473(b) Relief	0.10 350.00/hr	35.00
JRU	Review and revise Plaintiff's Ex Parte regarding 473(b) Relief	0.10 350.00/hr	35.00
RE	Prepare draft of Declaration of associate attorney Amy Smith in support of Plaintiff's Ex Parte regarding 473(b) Relief	0.20 175.00/hr	35.00
RE	Prepare draft of Plaintiff's Ex Parte regarding 473(b) Relief	0.80 175.00/hr	140.00
8/14/2018 RE	Review and revise Motion for Prejudgment Interest, Declaration of Associate attorney Amy Smith, and Proposed Order	0.50 175.00/hr	87.50
LBV	Research and analysis regarding motion for PJI and opposition to motion to tax/strike; Draft, review and revise PJI from 998 date	1.30 350.00/hr	455.00
8/16/2018 RE	Prepare, file, and serve Motion for Prejudgment Interest, Declaration of Associate attorney Amy Smith, and Proposed Order; Draft, review and revise proof(s) of service; Draft, review and revise email to Nationwide regarding service	0.30 175.00/hr	52.50
8/23/2018 LBV	Research and analysis regarding MAF deadline when JNOV filed	1.20 350.00/hr	420.00
8/30/2018 ARS	Review FCA's opposition; Draft, review and revise reply in support of motion for prejudgment interest	3.00 375.00/hr	1,125.00
8/31/2018 RE	Prepare, file, and serve Plaintiff's Reply to Motion for Prejudgment Interest; Draft, review and revise proof(s) of service; Draft, review and revise email to Nationwide regarding service	0.20 175.00/hr	35.00
9/4/2018 LBV	Draft, review and revise order denying motion for jnov	0.70 350.00/hr	245.00

		Hrs/Rate	Amount
9/4/2018 LBV	Draft, review and revise fee motion	4.00 350.00/hr	1,400.00
9/5/2018 LBV	Draft, review and revise fee motion	1.00 350.00/hr	350.00
9/7/2018 LBV	Draft, review and revise fee motion	3.00 350.00/hr	1,050.00
9/10/2018 ARS	Travel to and from and attend hearing on plaintiff's motion for prejudgment interest in Riverside	5.50 375.00/hr	2,062.50
LBV	Draft, review and revise declaration for motion for attorneys fees	2.00 350.00/hr	700.00
9/25/2018 ARS	Draft, review and revise reply to FCA's opposition to Pltf's motion to tax costs	6.00 375.00/hr	2,250.00
9/26/2018 ARS	Draft, review and revise opposition to FCA's motion to tax costs	4.00 375.00/hr	1,500.00
10/2/2018 ARS	Travel to and from and attend hearing on Pltf's motion to tax costs	5.50 375.00/hr	2,062.50
10/9/2018 ARS	Travel to and from and attend hearing on FCA's motion to tax costs	5.50 375.00/hr	2,062.50
11/16/2018 ARS	Draft, review and revise reply to opposition to motion for attorneys fees	4.00 375.00/hr	1,500.00
12/6/2018 RMW	Travel to and from and attend hearing on motion for attorneys fees	5.00 575.00/hr	2,875.00