

BURSOR & FISHER, P.A.

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Lead Interim Class Counsel

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

In Re: Smashburger IP Holder, LLC, et al.
ALL CASES

Lead Case No. LA CV19-00993-JAK
(JEMx)

**DECLARATION OF MARC G.
REICH IN SUPPORT OF MOTION
FOR AWARD OF ATTORNEYS'
FEES, REIMBURSEMENT OF
EXPENSES, AND PLAINTIFFS'
REQUEST FOR SERVICE AWARDS**

Date: January 30, 2023
Time: 8:30 a.m.
Courtroom: 10B

Hon. John A. Kronstadt

1 I, Marc G. Reich, declare as follows:

2 1. I am an attorney at law licensed to practice in the State of California. I
3 am a partner at Reich Radcliffe & Hoover LLP, co-counsel of record for Plaintiffs. I
4 make this declaration in support of Plaintiffs' Motion for Award of Attorneys' Fees.
5 I have personal knowledge of the facts set forth in this declaration, and, if called as a
6 witness, could and would competently testify thereto under oath.

7 2. My firm took on this case on a contingency fee basis and has not
8 received a single dollar for our work on the case.

9 3. I performed most of the work at my firm on this case. I was assisted at
10 times by attorneys Adam Hoover and Byron Ahn. A copy of my firm's resume is
11 attached as **Exhibit A**. It accurately summarizes my firm's class action experience
12 and the experience and qualifications of the attorneys from my firm who worked on
13 this case. Also, as noted in the firm resume, I frequently co-counsel with Bursor and
14 Fisher in class action cases. In particular, I have worked with Tim Fisher on cases
15 since about 1998 and believe we have developed a very efficient way of sharing the
16 work in cases.

17 4. Attached as **Exhibit B** is a spreadsheet showing my firm's daily time
18 entries in this matter. I have personally reviewed all of my firm's time entries and
19 have used billing judgment to ensure that duplicative or unnecessary time has been
20 excluded and that only time reasonably devoted to the litigation has been included.
21 The time and descriptions displayed in my firm's billing records were regularly and
22 contemporaneously recorded by me and the other timekeepers of the firm pursuant to
23 firm policy and have been maintained in the computerized records of my firm.

24 5. Attached hereto as **Exhibit C** is a spreadsheet for my firm showing (1) a
25 summary of the hours worked by each attorney organized by task and (2) a summary
26 of the hours worked by each attorney organized by attorney including a list of all of
27 the tasks on which the attorney worked, the hours worked on each task, and the
28 hourly rate of each attorney. My practice is based in Newport Beach. Based on my

1 knowledge and experience, the hourly rates charged by my firm are within the range
2 of market rates charged by attorneys of equivalent experience, skill, and expertise in
3 Southern California.

4 6. My firm's rates have been deemed reasonable by numerous courts. For
5 example, about 2 and ½ years ago, on July 22, 2020, in *Moore v. Kimberly Clark*,
6 Circuit Court for the 20th Judicial Circuit, County of St. Clair State of Illinois, Case
7 No. 19L0846, the Court granted in full an attorney fee request that included a \$775
8 hourly loadstar for me. More recently, in August 2022, in *United States ex. rel.*
9 *Maithel and Galvan v. Ventura etc. et al.*, United States District Court for the
10 Central District of California, Case No. CV 15-7760 TJH (JEMx), the firm resolved
11 an attorney fee entitlement based upon an \$875 hourly loadstar for me and a \$775
12 hourly loadstar for my law partner Adam Hoover.

13 7. My firm has incurred \$105.88 in expenses in this case consisting of
14 travel and parking expenses for appearing in Court and at mediation.

15 8. I worked closely with 4 of the 5 Named Plaintiffs in this action;
16 Plaintiffs Andre Galvan, Lucinda Lopez, Thu Thuy Nguyen and Robert Meyer.
17 They were very dedicated to this case and spent significant time assisting us with the
18 prosecution of this case. Throughout the litigation, I regularly consulted with and
19 updated them on the progress of the case and to discuss strategy. They actively
20 assisted us in our pre-suit investigation by sharing information about their experience
21 with purchasing Triple-Double burgers from Smashburger. They likewise assisted in
22 drafting the complaints and reviewed the complaints for accuracy before they were
23 filed. Each of the Plaintiffs were instrumental throughout the long settlement
24 process and were determined to ensure the Class obtained the best settlement
25 possible under the circumstances. They were also prepared to litigate this case
26 through class certification and trial if necessary. Each of the Plaintiffs estimates that
27 he or she spent approximately 10 to 20 hours working on this case. Their dedication
28

1 and efforts have conferred a significant benefit on the tens of thousands of Class
2 Members.

3 I declare under penalty of perjury under the laws of the United States and the
4 State of California that the foregoing is true and correct. Executed on December 5,
5 2022 at RSM, California.

Marc G. Reich

Marc G. Reich (Dec 5, 2022 16:09 PST)

Marc G. Reich

EXHIBIT A

REICH RADCLIFFE & HOOVER

L.L.P

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PARTNERS
MARC G. REICH
RICHARD J. RADCLIFFE
ADAM T. HOOVER

OF COUNSEL
MICHAEL K. BURKE

FIRM PROFILE

Marc G. Reich founded the practice on January 1, 1999. That practice has grown into Reich Radcliffe & Hoover LLP, an innovative law firm that has established a network of attorneys and affiliated law firms to meet the civil litigation and business law needs of its clients. Because of the firm's resources, it can expand or contract to efficiently meet the needs of a particular case or matter, without unnecessary overhead expenses. It is committed to providing high quality, responsive and efficient legal services. The firm is currently litigating several cases with amounts in dispute in the tens of millions of dollars. The firm has received an AV rating from Martindale-Hubbell. Martindale-Hubbell is a legal directory service that has been in existence for more than 133 years and currently maintains a database of over one million lawyers and law firms in 160 countries. The AV rating is Martindale-Hubbell's highest rating and is reserved for firms with very high to preeminent legal ability, and professional and ethical standards.

The firm's clients have included 5thGearSolution, LLC, Acta Laboratories, Advanced Systems Integration, Inc., America West Properties, Inc., Aquatic Rehab and Consulting, Axa Assistance Deutschland GMBH, Bigfoot Entertainment, Ltd., Bigfoot Productions, Inc., Bigfoot Ventures, Ltd., BioData Radiology Services, Inc., Bob-Leon Plastics, Inc., Cam Steel Company, Inc., Canales Holdings Incorporated, Centurion Capital Group, Inc., Chroma Systems Solutions, Inc., The College Network, Columbus Bank & Trust Co., Copy Resources, Inc., DatCard Systems, Inc., De Novo Corporation, Do Justly, LLC, DMS Building Maintenance, Inc., Dynasty Plumbing, Inc., Fairbanks Enterprises, Inc., FileKeepers, LLC, Financial Advisors, Inc., Getac, Global Design Build, Inc., Gosiger, Inc., Harbor Objects, LLC, Hycor Biomedical LLC, Hyter Development Company, Inter Partner Assistance Service GMBH, Global Solutions, Inc., Inter Partner Assistance SA, J & R Imports, Ltd., Kistler & Kistler, Inc., Louisiana Seafood Importers, Lyon Management Group, Inc., Lyon Realty Advisors, Majesco Entertainment, MarKei Contractors, MasterCare Protection & Cleaning, Inc., Maximal Intensity Projection, LLC, Max Q Systems, Inc., Messenger Investment Compan, Microsemi Real Estate, Inc., Monarch Heavy Haul, Multi Sales, Inc., NextPat Ltd., Oceanview Wireless, LLC, OleumTech Corporation, Oceanview Wireless, LLC, Palmar and Company, Payment Resources International, LLC, Pilar M. De Castro & Co., Inc., Pinnacle Window Coverings, Inc., Pomona Valley Educational Foundation, Precision Diagnostic Imaging, Inc., Predictive Health Diagnostics Company, The Ranch Sports Grill, Inc., Southern California Mobile Xray LLC., Redline Remarketing, Inc., Seabreeze Church, Shoreline Pools and Spas, SoCal Airflow Pros, Spartan Motors, Inc., StatMobile, Inc., Strategic Restaurant Engineering Inc., Taitron Components Incorporated,

Terescription, Teamwork Athletic Apparel, Inc., The Most Organization, Inc., The Priority Center, The Senna Corp., The William Lyon Property Management Company, TransFirst, LLC, TransFirst ePayment Services, Inc., Transworld Benefits, Inc., United Futbol Club, Dr. Jose R. Valdez, Valley Academies Foundation, and Vivien and Gloria Enterprises, Inc.

A significant portion of the firm's practice includes class action, shareholder derivative and false claims act litigation. The firm has been sole lead counsel in the following class action lawsuits: Garcia et al. v. Pilar M. De Castro & Co. et al, OCSC Case No. 03CC03340 (Wage and Hour Overtime Class Action), Reis v. The William Lyon Company et al., OCSC Case No. 04CC1093 (Unfair Competition and Class Action) and Levante et al. v. Pilar M. De Castro & Co., OCSC Case No. 30-2015-00789615 (Wage and Hour Meal and Rest Break Class Action). The firm has been co-lead counsel in the following class action lawsuits: Runner et al. v. United Parcel Service, Inc., OCSC Case No. 04CC0096 (Nationwide Breach of Contract Class Action) and Berryman et al. v. Merit Property Management, Inc. et al., OCSC Case No. 05CC0056 (Unfair Competition and Consumer Class Action). In addition, the firm has actively participated in the following class and derivative action lawsuits: Vitamin Cases, J.C.C.P. No. 4076 (Indirect Purchaser Antitrust Class Action), Polyester Staple Antitrust Litigation, JCCP No. 4278 (Indirect Purchaser Antitrust Class Action), California Indirect Purchaser MSG Antitrust Cases, JCCP No. 304471 (Indirect Purchaser Antitrust Class Action), Kistler & Kistler, Inc. v. Bowater, Inc., et al., S.F. Super. Ct. Case No. CGC-05-438152 (Indirect Purchaser Antitrust Class Action), In re: Cellphone Termination Fee Cases, JCCP No. 4332 (Unfair Competition and Consumer Class Action), Freeland et al. v. AT&T Corp. et al., MDL Master File 02 Civ. 2637 (Direct Purchaser Antitrust Class Action), In Re Wireless Telephone 911 Calls Litigation, MDL Docket No. 1521 (Unfair Competition and Consumer Class Action), Automobile Antitrust Cases I, II, JCCP Nos. 4298 and 4303 (Indirect Purchaser Antitrust Class Action), Pfeiffer derivatively on Behalf of Activision, Inc. v. Kotick et al., C.D. Cal. Case No. CV-06-04771-MRP(JTLx) (Options Backdating Derivative Action), Milton Pfeiffer, derivatively on Behalf of Corinthian Colleges, Inc., C.D. Cal. Case No. CV-06-0777-JVS(ANx) (Options Backdating Derivative Action), In Re: Processed Egg Products Antitrust Litigation, MDL No. 2002 08md02002 (Indirect Purchaser Antitrust Class Action), In Re: Automotive Parts Antitrust Litigation, Master File No. 12-md02311 (Indirect Purchaser Antitrust Class Action); In Re: Lithium Batteries Antitrust Litigation, MDL No. 2420 (Indirect Purchaser Antitrust Class Action), In Re Korean Ramen Antitrust Litigation, N.D. Cal. Case No. 3:13cv04115WHO (Indirect Purchaser Antitrust Class Action), Gastelum v. Verizon California Inc., San Francisco County Superior Court Case No. CGC-11-511467 (Unfair Competition and Consumer Class Action), Roof v. Scott, et al., 2:14-CV-03777-CAS-JEM (Growlife Derivative Action), Bernstein v. Anzalone, et al., 2:14-CV-09247-CBM-AS (Arrowhead Research Derivative Action), da Luz v. Park, et al. SFSC No. CGC 16-552062 (Consolidated FitBit Class Action), Weichel v. Banatao, et al., Alameda SC No. RG15783287 (Ikanos Class Action), McDonald v. Oronsky, et al., Alameda SC No. RG17850330 (Dynavax Derivative Action), Kilpatrick v. Simon, et al. LASC No. BC623167 (Capstone Turbine Derivative Action). In Re: Fisher-Price Rock 'N Play Sleeper Marketing, Sales Practices, And Products Liability Litigation, MDL No. 1:19-md-2903 (Unfair Competition and Consumer Class Action), Choi v. Kimberly-Clark etc., C.D. Cal. Case No. 8:19-cv-00468 (Unfair Competition and Consumer Class Action).

Brief profiles on the attorneys practicing at the firm are listed below. In addition, the firm at times co-counsels with Spach, Capaldi & Waggaman, LLP, and/or Bramson, Plutzik, Mahler & Birkhaeuser, LLP and/or Bursor and Fisher in complex business and class action litigations.

Marc G. Reich

Marc has received an individual AV rating from Martindale-Hubbell, its highest rating, and has been named a Southern California Rising Star and a Southern California Super Lawyer by the Publishers of Los Angeles Magazine and Law & Politics, a distinction reserved for only 5 percent of lawyers practicing in Southern California. Marc has also been listed as one of the top attorneys in Orange County, California by Orange Coast Magazine. Marc is licensed to practice before all the State Courts in California, before all the Federal Courts in the Southern, Central and Northern Districts of California and before the Ninth Circuit Court of Appeals. His practice emphasizes business litigation and business law. He has litigated hundreds of cases, and has had fifteen trials, including four jury trials. Marc obtained a defense verdict in a premises liability case in which the plaintiff sought more than \$1 million in compensatory and punitive damages and was part of a trial team that obtained a verdict that would have resulted in more than a \$100 million recovery to a class of California consumers (the case settled after appeal). Marc has also taught continuing education seminars on deposition taking skills.

Marc graduated from UC Davis Law School in 1991, where he finished in the top 15% of his class. Upon graduation, Marc clerked for the Honorable Justice Warren Matthews of the Supreme Court of Alaska. After his clerkship, Marc entered private practice as an associate at Irell & Manella. Before law school, Marc worked as an accountant for Ernst & Whinney, where Marc passed the CPA Examination.

Marc is involved in his community. Marc is a past treasurer of the Melinda Heights Elementary School PTA, is president of his homeowners' association, is the past treasurer of the United Futbol Club and is on the Board of Directors of The Priority Center (FNA the Orange County Child Abuse Prevention Center). Marc resides in Rancho Santa Margarita with his wife.

Richard J. Radcliffe

Richard J. Radcliffe was formerly a named partner in the AV-rated law firm, Capretz & Radcliffe LLP of Newport Beach, California, and has worked in the Office of General Counsel for Ernst & Young, LLP. He also served as a litigation attorney in the First Amendment and business litigation law firm of Spach, Capaldi & Waggaman, LLP of Newport Beach and San Diego, California. Richard is licensed to practice before all the State and Federal Courts in California and the United States Tax Court. He is certified by the State Bar of California as a specialist in appellate law. His practice emphasizes business probate, and real estate litigation, appellate advocacy, and business planning and counseling. He has had approximately 50 trials.

Richard holds several graduate degrees. He earned his Juris Doctor degree from Loyola Law School in 1991, where he was an editor of the Law Review, and received the *American Jurisprudence* Award in Trial Advocacy. In addition, Richard has received an advanced law degree, an L.L.M. in Taxation, from the University of San Diego School of Law. On top of his

law degrees, Richard has earned an M.A. in Theology from Fuller Theological Seminary, School of Theology, with a 3.80 GPA. He obtained a B.S., *summa cum laude*, studying accounting, business management, and public administration, from Biola University in 1988 where he finished number one in his class, with a 4.0 GPA. Richard was a member of the Board of Directors and an officer of his homeowner's association, and has obtained a California Real Estate Broker's License (inactive).

Adam T. Hoover

Adam joined the firm in 2005 after graduating from Texas Tech School of Law. Adam was a member of the Texas Tech Law Review, where he served as Manuscript Editor in 2003 and Technology Editor in 2004. In 2005, Adam published a Law Review article on FCC telecommunication rule-making procedures. Since joining the firm in 2006, Adam has litigated disputes in business contracts, real estate, commercial debt collection and employment law. Adam has been involved in four trials and has made appellate arguments before the Second District Court of Appeal. Adam frequently represents credit card processing companies and has litigated over twenty disputes on their behalf.

Adam also assists clients with their transactional needs, including copyright and trademark filings, corporate transactions, employment contracts and compliance research. Adam is a member of the Litigation Section of the State Bar of California and the Business Litigation Section of the Orange County Bar Association.

Michael K. Burke

Michael has extensive experience in both courtrooms and in boardrooms. He has litigated and tried cases in 11 states; he has briefed cases to the US Supreme Court and California Supreme Court; and he has briefed and argued cases before 5 of the federal circuit courts of appeal. Michael has substantial experience in employment matters, trade secret misappropriation, unfair competition and business fraud. He represents clients in partnership and shareholder disputes, media law and defamation, and health care issues.

He has represented clients in class actions to favorable outcomes, and handled law firm dissolutions for numerous Los Angeles law firms. Michael has extensive experience negotiating positive outcomes with state and federal agencies, including the US Department of Justice (DOJ), the Securities and Exchange Commission (SEC), the Federal Trade Commission (FTC), and the Food and Drug Administration (FDA).

Michael is regularly consulted by other lawyers and law firms on legal strategy and ethics matters. He is a speaker in both professional and industry forums on developments in the legal landscape.

Michael began his legal career clerking for the United States Ninth Circuit Court of Appeals and the United States District Court (Central District California), before joining Morrison & Foerster (top 10 international law firm) and later working for Kinsella Boesch (Los Angeles boutique litigation firm). He has also served as General Counsel to companies in

consumer retail, food manufacturing, education, media and entertainment, solar power utilities, and real estate development and has served as a policy analyst and consultant at the RAND Corporation in Santa Monica, California, a nonpartisan global policy think tank.

Michael attended the UCLA School of Law, where he was selected for the UCLA Law Review (journal of scholarly legal articles) and was a member of the Roscoe Pound Moot Court Honors Society (oral argument competition). Michael was a Research Assistant (Prof. Steven Shiffrin, Constitutional Law) and a Teaching Assistant (Legal Writing and Research). Michael was selected as the Greenberg Scholar at UCLA.

Michael also attended Cornell University SC Johnson Graduate School of Management (business management), University of Virginia Darden School of Business (business strategy), and University of Illinois (cognitive psychology).

Michael has served on numerous corporate and non-profit boards of directors and advisory boards. Michael is currently serving on UCLA's Center for Autism Research and Development (CART), UC-Irvine's Center for Autism and Neurodevelopment (CAND), the Saddleback Valley Unified School District, and In STEPPS Academy.

On the personal front, Michael is the father of two special needs children, and is a passionate advocate for advancing research and clinical treatments for those on the autism spectrum.

Byron S. Ahn

Byron is a 2012 graduate of the University of California – Davis School of Law. Byron was an editor for the UC Davis Law Review, where he served as Associate Articles Editor in 2012. Byron also created and co-taught a seminar on the laws and regulations related to the gaming industry.

EXHIBIT B

RRH Detailed Loadstar for Smashburger Case from Inception Through 12/2/22						
Atty	Time	Rate	Value	Date	Code	Description
ATH	1.50	\$775.00	\$1,162.50	2/8/2019	1	Phone calls with MGR and TF re: Smashburger complaint and images for Complaint. Review SB website and marketing for images.
ATH	0.20	\$775.00	\$155.00	2/12/2019	1	Review emails re: new class rep and retainer; emails re: status of summons.
ATH	0.20	\$775.00	\$155.00	2/13/2019	1	Emails with counsel re: website article.
ATH	0.10	\$775.00	\$77.50	2/14/2019	1	Review emails between co-counsel re: summons and status of service.
ATH	0.20	\$775.00	\$155.00	5/23/2019	1	Review email from co-counsel re: reviewing draft complaint. Review and
ATH	0.30	\$775.00	\$232.50	8/20/2019	1	Review emails between co- and def. counsel re: stipulations, proposed order, and draft of Second Amended Complaint.
MGR	7.20	\$875.00	\$6,300.00	2/7/2019	1	Review Law360 article about false claims by Smashburger. .2 Pcs with numerous clients, including Andre Galvan, Marty Canalas, Emma Reich, Tim Runner, Maria Barrera, Joe Panganiban, Janna Choi, Rick Wyand, Keith Shelly, Rob Buller and Ben Azar re same. 3.2. Several more calls with Andre re potential class action claims and class action process. .8 Travel to and from and meet with Mario Soto re same. 2.5 Exchange emails with Tim Fisher re
MGR	11.50	\$875.00	\$10,062.50	2/8/2019	1	Travel to and from and meet with Mike DeArmey re potential class action claims. 2.5 Exchange emails with Tim Fisher re preparing complaint. .5 Numerous calls with Tim and/or Blair re same. .8 Numerous calls, emails and texts with Andre re same and class action process. .9 Meeting with Troy Tayler re his potential claim. .5 Review file from InNOOut case. 2.7. Travel to and from and meet with Handball Players re: their potential claims.2.5. Review
MGR	3.70	\$875.00	\$3,237.50	2/9/2019	1	Travel to and from and meet with Aaron Altman re his potential claim. 2.6. Draft retainer agreement for Andre. .4. Exchange emails with TF re same. .2 Telephone call with Andre re class rep duties. .5
MGR	2.10	\$875.00	\$1,837.50	2/10/2019	1	Exchange texts with Marc Berman re; his potential claims. .2 Telephone call with him re same. .2 Exchange texts with Ira Dannanberg re same. .2. Telephone call with Ira re same. .2. Telephone call with Lucinda re same. .4. Revise retainer agreement to Andre and draft email to him re same. .3 Telephone call with Neil Sorger re his potential claims.3 Exchange texts with

RRH Detailed Loadstar for Smashburger Case from Inception Through 12/2/22						
Atty	Time	Rate	Value	Date	Code	Description
MGR	1.00	\$875.00	\$875.00	2/11/2019	1	Telephone call from Lucinda Lopez about her retaining my firm. 4. Telephone call with TF re same and pursuing claims for states other than Cal. .2. Review and respond to email from Andre re his question about his retainer agreement. .2 Draft Retainer Agreement for Luciinda. .2
MGR	1.30	\$875.00	\$1,137.50	2/12/2019	1	Review and respond to email from Lucinda re retainer agreement. 2 Draft email to her attaching complaint. .1 Review 6 - Notice of Court ADR Program. .1 Review 5 - Notice of Assignment. .1 Quick research re: Judge Kronstadt. .3 Exchange several emails with Tim re: same. .1 Review 7 - Notice Def in Filing of Summons. .1 Exchange emails with Tim re same. .1 Exchange emails with Tim re fully executed retainer agreement. .1 Review issued summons. .1
MGR	0.10	\$875.00	\$87.50	2/14/2019	1	Draft email to co-counsel re serving defendants.
MGR	0.40	\$875.00	\$350.00	2/15/2019	1	Draft email to Andre re: the article in Top Class Actions. .2 Telephone call with him re same .2
MGR	0.70	\$875.00	\$612.50	3/14/2019	1	Review draft amended complaint. .3 Telephone call with Tim re same and adding 2nd named plaintiff. .2 Draft email to him re: same. .2
MGR	0.80	\$875.00	\$700.00	3/18/2019	1	Review and revise revised draft 1AC. .4 Draft email to clients re: same. .2 Telephone call with Andre Galvan re same. .2
MGR	0.10	\$875.00	\$87.50	4/29/2019	1	Review 23 - Stip to respond to compl
MGR	0.40	\$875.00	\$350.00	5/20/2019	1	Review 28 - Order re Consol, Intervention and Sched Conf. .1 Review and respond to email from Tina Wolfson re meet and confre call. .2 Exchange emails with TF re same. .1
MGR	0.20	\$875.00	\$175.00	6/12/2019	1	Telephone call with TF re preparing for next week's hearing on motion to dismiss. .2

RRH Detailed Loadstar for Smashburger Case from Inception Through 12/2/22						
Atty	Time	Rate	Value	Date	Code	Description
MGR	2.30	\$875.00	\$2,012.50	7/17/2019	1	Telephone call with Mark Cooper re: his NY Smashcurger purchases. .2 Telephone call with Rob Meyer re: same, re the claims against Smashburger and re: the class action process. .6 Telephone call with Larry Fredella re: whether he wants to be a NY class rep. .3 Review draft amended consolidated complaint and draft insert to amended consolidated complaint to add Meyer. .7. Draft email to Meyer re: same. .1 Draft email to Matt Berman re: case and re: his NY purchases at Smashburger. .2. Draft email to TF re: status of potential NY Plaintiffs. .2
MGR	0.30	\$875.00	\$262.50	7/19/2019	1	Discussions with TF re: adding additional named plaintiffs.
MGR	2.60	\$875.00	\$2,275.00	7/21/2019	1	Review and revise draft Consolidated Amended Complaint.
MGR	0.50	\$875.00	\$437.50	7/23/2019	1	Exchange emails with Nguyen re: her retainer agreement. .1 Draft email to TF re same. .1. Draft email to Nguen re: her allegations in the Consolidated complaint.. .1 Exchange emails with her re: her changes to complaint. .2
MGR	1.10	\$875.00	\$962.50	7/23/2019	1	Review new version of draft consolidated amended complaint from Fisher firm. .7 Draft email to TF with additional revisions. .2 Review revisions suggested by Trevino firm. .2
MGR	0.60	\$875.00	\$525.00	7/24/2019	1	Take one more read through current version of consolidated compl. Exchange emails with Blair re same.
MGR	0.50	\$875.00	\$437.50	7/26/2019	1	Draft email to Andre and Lucinda attached consolidated amended complaint and updating them on the status of the case.
MGR	0.80	\$875.00	\$700.00	8/13/2019	1	Prepare for Local Rule 7-3 conference regarding Smashburger's anticipated motion to challenge the consolidated amended class action complaint. .3 Telephone call with Blair re same. .1 Participate in call. .2 Telephone call with TF after conference. .2
MGR	0.10	\$875.00	\$87.50	8/21/2019	1	Review 44 - Order re Filing of 2AC.pdf
MGR	0.20	\$875.00	\$175.00	9/9/2019	1	Review answer to compl.
ATH	0.30	\$775.00	\$232.50	4/4/2019	2	Reivew notice from court re: new standing order and new standing order.

RRH Detailed Loadstar for Smashburger Case from Inception Through 12/2/22						
Atty	Time	Rate	Value	Date	Code	Description
ATH	0.30	\$775.00	\$232.50	4/17/2019	2	Review emails re: call with def. counsel re: motion to relate case. Prepare for/attend conference call with def. counsel by reviewing copycat case and comparing to Galvan case.
ATH	0.10	\$775.00	\$77.50	4/18/2019	2	Exchange emails with MGR re: yesterday's call with defense counsel.
ATH	0.20	\$775.00	\$155.00	5/20/2019	2	Review order re: Motion to Consolidate and Appoint Class Counsel and calendar hearing.
ATH	0.20	\$775.00	\$155.00	6/4/2019	2	Review emails from co-counsel re: draft of 26f report and emails with other pl. counsel re: same.
ATH	0.20	\$775.00	\$155.00	7/8/2019	2	Review emails from co-counsel re: edits to joint status report. Review draft and respond.
MGR	0.20	\$875.00	\$175.00	2/20/2019	2	Review Judge Kronstadt standing order.
MGR	0.60	\$875.00	\$525.00	2/22/2019	2	Telephone call with opposing counsel Mark Finkelstein re several issues including his request from more time to respond to complaint, whether all Ds were properly served and whether one D should be dismissed. .2 Quick research Mark's background. .3 Review and respond to email from Mark re extension of time to respond to complaint. .1
MGR	0.10	\$875.00	\$87.50	2/25/2019	2	Review POS's for all 3 defs.
MGR	0.20	\$875.00	\$175.00	2/27/2019	2	Review stip re extension of time to respond to complaint. .1 Review Order re submission of courtesy copies. .1
MGR	0.20	\$875.00	\$175.00	3/21/2019	2	Review stip for ext of time to file motion for class cert and for Ds to respond to compl.
MGR	0.40	\$875.00	\$350.00	3/22/2019	2	Review order on stip for ext of time to file motion for class cert and for Ds to respond to compl. .1 Review Sched Order. .3
MGR	0.30	\$875.00	\$262.50	4/2/2019	2	Review notice re: amended sched order. .1 Review amended sched order. .2
MGR	0.10	\$875.00	\$87.50	4/18/2019	2	Exchange emails with ATH re: yesterday's call with defense counsel.
MGR	0.80	\$875.00	\$700.00	6/3/2019	2	Review Court's 16 page order re: scheduling conferences. Review and revise TF's proposed JOINT RULE 26(f) REPORT

RRH Detailed Loadstar for Smashburger Case from Inception Through 12/2/22						
Atty	Time	Rate	Value	Date	Code	Description
MGR	1.90	\$875.00	\$1,662.50	6/5/2019	2	Review and revise protective order proposed by Tina Wolfson. Review ND Form Protective Order. Review Judge Guilford's Form Prot Order. Review Edwards case as suggested by Mag. Judge McDermitt's Procedure's. Draft email to TF re same.
MGR	0.50	\$875.00	\$437.50	6/6/2019	2	Review draft joint report incorporating Tina's changes. Draft emails to TF with additional suggested changes.
MGR	0.70	\$875.00	\$612.50	6/11/2019	2	Prepare for today's 26(f) conf with defense counsel. .3 Participate in 26(f) conf with defense counsel. .4
MGR	0.20	\$875.00	\$175.00	6/14/2019	2	Review final filed version of joint status report
MGR	0.30	\$875.00	\$262.50	6/27/2019	2	Review Court Minute Order from 6/24 hearing and calendar related dates.
MGR	0.40	\$875.00	\$350.00	7/2/2019	2	Review draft joint status report re: collaboration in case. Exchange emails wiith TF re same. Telephone call with TF re same.
MGR	0.20	\$875.00	\$175.00	7/7/2019	2	Review Tina Wolfson's redlines to our joint statement for working together. Draft email to TF re same.
MGR	0.20	\$875.00	\$175.00	7/8/2019	2	Review TF and ATH further edits to joint report. .05 Exchange emails with TF re same. .05. Review additional redlines from TF. .05. Exchange emails with TF re same. .05
MGR	0.10	\$875.00	\$87.50	11/26/2019	2	Review stip to dismiss Trevino
MGR	0.10	\$875.00	\$87.50	2/18/2020	2	Review status report
MGR	0.20	\$875.00	\$175.00	4/7/2020	2	Review stip to continue case deadlines and supporting papers.
MGR	0.80	\$875.00	\$700.00	6/29/2020	2	Review stip and supporting papers to continue case deadlines. .1 Exchange email with Tim re: suggested changes. .1 Review Judge's requirements for stips .2 Exchange emails with Tim re same. .2 Draft email to opposing counsel with suggested change. .1 RReview filed version of stip papers.
ATH	0.40	\$775.00	\$310.00	5/23/2019	3	Conference call with co-counsel to prepare for call with Trevino counsel; conference call with Trevino counsel.
ATH	0.20	\$775.00	\$155.00	6/12/2019	3	Phone call with MGR and T.Fisher re: hearing on Motion to Appoint lead.
ATH	0.10	\$775.00	\$77.50	6/19/2019	3	Review emails between co-counsel re: conferring with Trevino counsel

RRH Detailed Loadstar for Smashburger Case from Inception Through 12/2/22						
Atty	Time	Rate	Value	Date	Code	Description
MGR	0.10	\$875.00	\$87.50	4/17/2019	3	Exchange emails with Tim and Adam re meet and confer re motion for appt of interim lead counsel.
MGR	0.80	\$875.00	\$700.00	4/24/2019	3	Review draft motion for appointment of interim class counsel. Draft email to co-counsel with my comments.
MGR	0.10	\$875.00	\$87.50	4/26/2019	3	Review Order advancing hearing on motion to appoint lead counsel.
MGR	0.10	\$875.00	\$87.50	5/13/2019	3	Review D statement of non-opp to motion to appoint lead counsel.
MGR	1.40	\$875.00	\$1,225.00	5/15/2019	3	Review Trevino Motion for Appointment of Lead Counsel. .7 Review Trevino opp to our mot. .3 Review Trevino mot to intervene. .4
MGR	2.00	\$875.00	\$1,750.00	5/19/2019	3	In person meeting with Tim re staffing and strategy. Travel to and from meeting.
MGR	0.10	\$875.00	\$87.50	5/21/2019	3	Review and respond to email from TF re negotiations with Ahdoot & Wolfson.
MGR	0.50	\$875.00	\$437.50	5/23/2019	3	Exchange emails with TF re: preparing for today's conf call with Ahdoot firm. .1 .Prepare for call. .2 Telephone call with TF to prepare. .1 Conf call with Tina Wolson re 26(f) scheduling. .1
MGR	1.40	\$875.00	\$1,225.00	5/23/2019	3	Review and revise opp to Trevino Motion to be appointed lead.
MGR	0.20	\$875.00	\$175.00	6/18/2019	3	Draft email to TF re: voice mail from Brad King.
MGR	0.50	\$875.00	\$437.50	6/19/2019	3	Research Brad King's background. .2. Telephone call with Brad King re: fee and work sharing.. .1 Draft email to TF re: same. .2
MGR	1.50	\$875.00	\$1,312.50	6/23/2019	3	Prepare to tomorrow's hearing.
MGR	7.30	\$875.00	\$6,387.50	6/24/2019	3	Travel to and from LA. Meeting with TF to prepare for hearing. Appear at Status Conference and on hearing for motion to appoint lead counsel.
MGR	0.30	\$875.00	\$262.50	7/7/2019	3	Review transcript from 6/24 hearing.
ATH	2.30	\$775.00	\$1,782.50	7/23/2019	4	Contacts with friends/family re: Smashburger purchases
ATH	0.30	\$775.00	\$232.50	11/26/2019	4	Review emails re: logging in to e-discovery platform.
ATH	0.20	\$775.00	\$155.00	1/14/2020	4	Emails with B.Reed re: status of document review and assigned batches.
ATH	0.20	\$775.00	\$155.00	10/6/2020	4	Review and respond to email from MGR re: new "double" representations from Smashburger.

RRH Detailed Loadstar for Smashburger Case from Inception Through 12/2/22						
Atty	Time	Rate	Value	Date	Code	Description
BSA	2.10	\$575.00	\$1,207.50	1/14/2020	4	Review complaint. .7 Reviewed and coded 160 documents. 1.4
BSA	1.10	\$575.00	\$632.50	1/15/2020	4	Reviewed and coded 240 documents. 1.1
BSA	1.00	\$575.00	\$575.00	1/16/2020	4	Reviewed and coded 200 documents.
MGR	2.40	\$875.00	\$2,100.00	6/30/2019	4	Research re: Smashburger locations in the US. Review firm records re: clients located near Smashburger locations. Draft email to TF re: same.
MGR	1.90	\$875.00	\$1,662.50	7/1/2019	4	Exchange emails with TF re: investigating claims in other states. .2. Draft email to Bob Longobucco about Smashburger allegations. .2 Drafft email to Larry Fredella re same. .2 Telephone call with Elycee Burger re same. .3 Telephone call with Thomas McManus re same. .5 Telephone call with Lawrence Fredella re same. .4 Draft email to TF re my conversation with Fredella. .2
MGR	0.30	\$875.00	\$262.50	7/2/2019	4	Draft email to Larry Fredella attaching 1AC. Review and respond to email from him re same.
MGR	1.90	\$875.00	\$1,662.50	7/5/2019	4	Telephone call with Steven Rubinfeld about case against Smashburger and his Smashburger purchases in NY. .6 Telephone call with Marc Cooper re same. .4 Telephone call with Rob Asen re same. ..5 Telephone call with Rob Strell re same. .4
MGR	0.80	\$875.00	\$700.00	7/8/2019	4	Review Judge's Standing Order re: initial disclosures. Review FRCP 26 re same. Review and revise draft initial disclosures. Exchange emails with Blair Reed re same. Sev calls with Blair re same.
MGR	0.20	\$875.00	\$175.00	7/8/2019	4	Review Ds Initial Disclosures
MGR	1.40	\$875.00	\$1,225.00	7/9/2019	4	Telephone call with Yim Noble about case against Smashburger and her Smashburger purchases in NY. .4 Telephone call with Ji Choi re same. .3 Telephone call with Charles Chung re same .3. Telephone call with Joyce Beamer gainst Smashburger and her Smashburger purchases in Mich. .4
MGR	0.30	\$875.00	\$262.50	7/12/2019	4	Telephone call with Ira Dananberg re: his NY Smashburger purchases.
MGR	0.20	\$875.00	\$175.00	7/15/2019	4	Exchange texts with Marc Berman re: his NY Smashburger purchases.

RRH Detailed Loadstar for Smashburger Case from Inception Through 12/2/22						
Atty	Time	Rate	Value	Date	Code	Description
MGR	2.30	\$875.00	\$2,012.50	7/16/2019	4	Travel to and from and meet with Mike Freeland regarding his NY Smashburger purchases and claims against Smashburger.
MGR	0.90	\$875.00	\$787.50	7/17/2019	4	Telephone call with Thu-Thuy Nguyen re: case and her Cal Smashburger purchases.
MGR	0.20	\$875.00	\$175.00	7/18/2019	4	Exchange texts with Marc Berman re: his son's Smashburger purchases.
MGR	0.50	\$875.00	\$437.50	7/20/2019	4	Review Smashburger locations in MI and compare them to address for clients located there. .3 Telephone call with Joyce Beamer re: case and her SB purchases in MI. .2
MGR	0.50	\$875.00	\$437.50	7/20/2019	4	Review Smashburger locations in Denver. Draft email to Damian Arguello re: case.
MGR	0.30	\$875.00	\$262.50	7/20/2019	4	Review Smashburger locations in Texas and North Carolina. Draft email to ATH re same.
MGR	0.40	\$875.00	\$350.00	7/20/2019	4	Review Smashburger in Florida and compare them to addresses of Florida clients. Draft email to Steven Toskes re same.
MGR	0.20	\$875.00	\$175.00	7/20/2019	4	Draft retainer agreement for Rob Meyer. Draft email to him re same.
MGR	0.30	\$875.00	\$262.50	7/20/2019	4	Draft retainer agreement for Thu-Thyy Nguyen. Draft email to her re same.
MGR	0.30	\$875.00	\$262.50	7/20/2019	4	Review Smashburger locations in NY, Conn and NJ. Draft email to Rob Meyer re same.
MGR	0.80	\$875.00	\$700.00	7/21/2019	4	Review and respond to texts from Dr. Meyer re: SB pulling triple double from menus in NY. .2 Research re same. .4. Review and respond to email from him re: retainer agreement. .1 Draft email to co-counsel re same. .1
MGR	0.30	\$875.00	\$262.50	8/21/2019	4	Review and revise draft RFPs.
MGR	0.40	\$875.00	\$350.00	9/4/2019	4	Review and revise class rep questionnaire.
MGR	0.10	\$875.00	\$87.50	10/3/2019	4	Review and respond to email from TF re: P questionnaires.

RRH Detailed Loadstar for Smashburger Case from Inception Through 12/2/22						
Atty	Time	Rate	Value	Date	Code	Description
MGR	2.60	\$875.00	\$2,275.00	10/4/2019	4	Review final version of Plaintiff Questionnaire. .2 Draft separate emails to clients re same. .6 Telephone call with w Thu Thuy Ngyuen re: same. .3. Several telephone calls with Andre Galvan re same .4. Draft text to him re same. .1 Exchange emails and texts with Rob Meyer to answer his questions about the questionnaire. .5 Review Dr. Meyer's responses to the questionnaire and exchange texts with him re same. .3. Draft email to TF re same. .2
MGR	0.60	\$875.00	\$525.00	10/28/2019	4	Review and revise Galvan answers to questionnaire. Several calls with him re same.
MGR	0.20	\$875.00	\$175.00	11/8/2019	4	Review stipulation for protective and proposed prot order.
MGR	0.20	\$875.00	\$175.00	11/13/2019	4	Review prot order entered into by court.
MGR	0.40	\$875.00	\$350.00	11/24/2019	4	Review and revise updated questionnaire from Andre
MGR	0.20	\$875.00	\$175.00	12/2/2019	4	Exchange emails with Lucinda re: questionnaire.
MGR	0.40	\$875.00	\$350.00	2/7/2020	4	Telephone call with Peter Moroh re: Smashburger case and harm to Illinois purchasers. Draft email to him re same.
MGR	0.20	\$875.00	\$175.00	3/18/2020	4	Review draft discovery meet and confer letter. Exchange emails with Blair re same.
MGR	0.30	\$875.00	\$262.50	3/23/2020	4	Review request from opposing to delay meet and confer efforts. Review TF proposed response. Review Tina Wolfsans comments. Telephone call with TF re same.
ATH	0.20	\$775.00	\$155.00	1/2/2020	5	Review emails re: mediation dates and respond.
ATH	4.20	\$775.00	\$3,255.00	10/14/2020	5	Begin drafting settlement documents: Review of Term Sheet and incorporate terms into formal settlement agreement.
ATH	4.80	\$775.00	\$3,720.00	10/15/2020	5	Continue drafting settlement documents: Revisions to settlement agreement; draft short and long form notice and proposed orders. Forward to MGR for review.
ATH	0.40	\$775.00	\$310.00	10/16/2020	5	Phone call with MGR re: review of and edits to Settlement Agreement.
ATH	1.50	\$775.00	\$1,162.50	10/20/2020	5	Exchange emails with MGR re: revisions to short form notice; draft revisions as per discussions and forward for review.
ATH	0.20	\$775.00	\$155.00	10/21/2020	5	Exchange emails with MGR re: status of settlement drafts

RRH Detailed Loadstar for Smashburger Case from Inception Through 12/2/22						
Atty	Time	Rate	Value	Date	Code	Description
MGR	0.70	\$875.00	\$612.50	12/10/2019	5	Telephone call with opposing counsel re mediators. .2. Telephone call with TF re same. .2 Exchange emails with colleagues re: info on Judge Andler. .3
MGR	0.10	\$875.00	\$87.50	12/11/2019	5	Review and respond to email from TF re: whether to use Judge Andler.
MGR	0.20	\$875.00	\$175.00	1/5/2020	5	Draft email to Tim re: need to modify scheduling order to extend deadlines to mediate and report on mediation.
MGR	1.70	\$875.00	\$1,487.50	1/31/2020	5	Review draft mediation statement. .6 Telephone call with TF re: the basis of the amount of our initial demand, the methodology of calculating class damages and other issues. .3 Review Weir settlement anal. .5 Telephone call with Tim re: same. .3
MGR	0.70	\$875.00	\$612.50	2/5/2020	5	Review final version of mediation statement. .3 Draft email to each client re same. .4
MGR	10.20	\$875.00	\$8,925.00	2/6/2020	5	Meeting with Tim and Blair to prepare for mediation. 1.5. Attend mediation . 7.2. Travel to and from mediation. 1.5
MGR	0.20	\$875.00	\$175.00	2/20/2020	5	Review and respond to client Lopez re: mediation results.
MGR	0.30	\$875.00	\$262.50	2/26/2020	5	Exchange emails with Tim re: Smash new settlement offer. .1 Telephone call with Tim re same. .2
MGR	0.80	\$875.00	\$700.00	3/12/2020	5	Telephone call with Tim, Blair and Tina re: responding to Ds' settlement offer. .2 Review 2 orders issued last week concerning in other cases our expert Colin Weir. .6
MGR	0.10	\$875.00	\$87.50	4/8/2020	5	Exchange emails with Tim re new mediation date.
MGR	0.10	\$875.00	\$87.50	4/14/2020	5	Review email confirmation from mediator re 5/7 mediation.
MGR	0.10	\$875.00	\$87.50	4/16/2020	5	Review emails and attachments from mediator re 5/7 mediation.
MGR	0.20	\$875.00	\$175.00	4/20/2020	5	Exchange emails with Tim re 5/7 mediation. .2
MGR	0.20	\$875.00	\$175.00	5/2/2020	5	Review Judicate West Confidentiality Agreement. .1 Exchange emails with Judicate West re same. .1
MGR	0.20	\$875.00	\$175.00	5/4/2020	5	Telephone call with Tim re: potential of non-class settlement.
MGR	0.60	\$875.00	\$525.00	5/6/2020	5	Prepare for tomorrow's mediation.
MGR	8.50	\$875.00	\$7,437.50	5/7/2020	5	Mediation

RRH Detailed Loadstar for Smashburger Case from Inception Through 12/2/22						
Atty	Time	Rate	Value	Date	Code	Description
MGR	0.80	\$875.00	\$700.00	6/30/2020	5	Review new settlement offer from D emailed from mediator today and review records for prior settlement term discussions. .4 Exchange emails with TF re our reactions to the settlement offer. .4
MGR	0.40	\$875.00	\$350.00	7/6/2020	5	Telephone call with Tim re: D latest settlement offer. .3 Review and respond to email from Tim with his proposed response to Ds. .1
MGR	0.50	\$875.00	\$437.50	8/23/2020	5	Review settlement term sheet email from Tim on Friday. Draft email to team with my comments.
MGR	0.50	\$875.00	\$437.50	9/9/2020	5	Review and respond to email from Lucinda re: status of the case. 2. Review new redlined settlement term sheet. Draft email to Tim with my comments. .3
MGR	0.50	\$875.00	\$437.50	9/9/2020	5	Review and respond to email from Lucinda re: status of the case. 2. Review new redlined settlement term sheet. Draft email to Tim with my comments. .3
MGR	0.20	\$875.00	\$175.00	9/10/2020	5	Telephone call with Tim re: NDA and financial disclosure provisions of settlement term sheet.
MGR	0.50	\$875.00	\$437.50	9/18/2020	5	Review revised settlement term sheet. Exchange emails with Tim re same. .4 Exchange emails with TF re: preparing formal settlement agreement. .1
MGR	0.10	\$875.00	\$87.50	9/29/2020	5	Review and respond to email from Blair re: settlement agreement. .1
MGR	1.50	\$875.00	\$1,312.50	9/30/2020	5	Draft email to clients re: settlement agreement. .3 Sev calls and texts with Rob Meyer re same. .4. Telephone call with Thu Thuy Ngyen re: same. .2 Telephone call with Andre Galvan re: same. .2 Telephone call with Lucinda Lopez re: same. .1 Draft email to team attaching signature received back from Rob. .1 Exchange emails with Tim re preparing full settlement agreement. 1. Cf w ATH re: same. .1

RRH Detailed Loadstar for Smashburger Case from Inception Through 12/2/22						
Atty	Time	Rate	Value	Date	Code	Description
MGR	1.00	\$875.00	\$875.00	10/1/2020	5	Review and respond to email from Nguyen re: settlement term sheet. .1 Telephone call with Andre Galvan to walk him thru agreement. .3 Draft email to him re: same. .1 Draft text to Lopez re: term sheet. .1 Draft email to co-counsel attaching signed term sheets for Nguyen and Galvan. .1 Exchange emails with Lopez re: settlement term sheet. .1 Exchange texts with Lopez re: settlement approval process. .1. Draft email to co-counsel attaching Lopez signature on term sheet. .1
MGR	0.90	\$875.00	\$787.50	10/15/2020	5	Review and revise draft settlement agreement from ATH.
MGR	1.40	\$875.00	\$1,225.00	10/16/2020	5	Continue to revise draft settlement agreement from ATH. Telephone call with him re same.
MGR	5.30	\$875.00	\$4,637.50	10/18/2020	5	Continue to revise draft settlement agreement from ATH.
MGR	2.40	\$875.00	\$2,100.00	10/19/2020	5	Review and revise ATH draft of settl agr exhs A, B and C.
MGR	5.50	\$875.00	\$4,812.50	10/20/2020	5	Review and revise exhs D, E and F.
MGR	0.20	\$875.00	\$175.00	10/21/2020	5	Exchange emails with ATH re: status of settlement drafts
MGR	0.20	\$875.00	\$175.00	10/28/2020	5	Review Notice of Settlement filed with Court. .1 Telephone call with TF re: status of edits to settlement agreement papers. .1
MGR	1.60	\$875.00	\$1,400.00	10/29/2020	5	Review Tim and Blair's changes to settlement agreement and draft email to Tim with my comments. .8 Review Tim and Blair's changes to settlement agreement exhibits and draft email to Tim with my comments. .8
MGR	0.10	\$875.00	\$87.50	11/4/2020	5	Review 61 - Order re Notice of Settlement
MGR	0.60	\$875.00	\$525.00	11/5/2020	5	Review Wolfson firm's proposed edits to settlement agreement docs.
MGR	1.30	\$875.00	\$1,137.50	12/28/2020	5	Review D's revisions to settlement documents and draft email to TF with my comments.
MGR	0.50	\$875.00	\$437.50	1/4/2021	5	Review and respond to email from Tim re: additional changes to settlement papers. .2 Telephone call with Tim re: same. .3
MGR	0.60	\$875.00	\$525.00	1/6/2021	5	Telephone call with Tim, Blair and opposing counsel re: revisions to settlement papers. .4 Sep call with Tim re same. .2
MGR	0.20	\$875.00	\$175.00	1/27/2021	5	Telephone call with Tim re: motion for prelim approval.
MGR	2.40	\$875.00	\$2,100.00	1/27/2021	5	Review and revise motion for prelim approval.

RRH Detailed Loadstar for Smashburger Case from Inception Through 12/2/22						
Atty	Time	Rate	Value	Date	Code	Description
MGR	0.40	\$875.00	\$350.00	1/28/2021	5	Telephone call with Tim re: payouts under settlement agreement. .2. Exchange emails with Tim re: motion for prelim approval. .2
MGR	1.50	\$875.00	\$1,312.50	2/3/2021	5	Review new version of motion for prelim approval emailed to me today from Blair and draft email to Tim and Blair with my comments and concerns.
MGR	0.40	\$875.00	\$350.00	2/4/2021	5	Internal Case Management Meeting. .2 Telephone call with Tim and Blair re: inconsistency between stip of settlement and claim form. .2
MGR	0.30	\$875.00	\$262.50	2/5/2021	5	Review exchange of emails with Tnia and Tim re: potential problem with settlement agreement. .2 Telephone call with Tim re same. .1
MGR	3.30	\$875.00	\$2,887.50	2/7/2021	5	Review Selna's tentative in Sirius, Tima's supplemental briefing and Selna's new ruling. 1.4 Review Chambers v. Whirlpool and draft email to Tim my thoughts on how it impacts our settlement.
MGR	0.60	\$875.00	\$525.00	2/9/2021	5	Telephone call with Tim and Blair re: coupon law issue. .2 Telephone call with Tim, Blair and Tina re: same. .2. 2nd call with Tim and Blair re: same. .2
MGR	0.20	\$875.00	\$175.00	2/17/2021	5	Telephone call with TF re: remaining issues with settlement agreement
MGR	0.40	\$875.00	\$350.00	5/24/2021	5	Draft email to clients regarding motion for prelim approval.
MGR	0.20	\$875.00	\$175.00	7/5/2021	5	Review Order from Court taking motion for prelim approval under submission. Exchange emails with TF re: same.
MGR	0.90	\$875.00	\$787.50	10/21/2021	5	Review yesterday's 9th Cir opinion in Message Envy. Draft email to TF re same.
MGR	0.40	\$875.00	\$350.00	12/31/2021	5	Sev calls over the last 5 months from Andre and Dr. Meyer re: status of case.
MGR	1.20	\$875.00	\$1,050.00	1/31/2022	5	Review Taylor v. Shutterfly, Inc. and draft notice of suppl auth.
MGR	0.40	\$875.00	\$350.00	2/20/2022	5	Draft update email to clients.
MGR	1.50	\$875.00	\$1,312.50	5/24/2022	5	Research re: getting a court to act a motion that has been pending for a lengthy time. Draft request to reset hearing on our motion for pre-lim. approval of class action settlement.

RRH Detailed Loadstar for Smashburger Case from Inception Through 12/2/22						
Atty	Time	Rate	Value	Date	Code	Description
MGR	0.60	\$875.00	\$525.00	5/26/2022	5	Draft email to clients re status and our filing yesterday .3 Review order setting hearing for 7/25 and draft email to clients re same. .3
MGR	1.50	\$875.00	\$1,312.50	7/12/2022	5	Review doc 71 order requesting additional info and begin compiling same.
MGR	0.50	\$875.00	\$437.50	7/20/2022	5	Begin gathering info in response to court's request for additional info.
MGR	3.40	\$875.00	\$2,975.00	7/22/2022	5	Review email from TF re: work clients have performed .1 Telephone call with him re same. .2 Review my time records and email exchanges with clients re: same and create spreadsheet of client work performed and draft email to clients attaching spreadsheet and providing case update. 3.1
MGR	0.60	\$875.00	\$525.00	7/23/2022	5	Review emails received from each client approving of their work summaries. .4 Draft email to TF re: same. .2
MGR	1.80	\$875.00	\$1,575.00	7/25/2022	5	Review draft docs to be filed tomorrow in response to Order requesting additional info ISO motion to prelim approval of class settlement and draft email to Tim with my suggested changes. .8 Research re: Judge Kronstadt reliance on Laffey Matrix and draft email to Tim re same. 1
MGR	0.30	\$875.00	\$262.50	7/26/2022	5	Research re: authorities for atty fee rates and draft email to TF re: same.
MGR	0.40	\$875.00	\$350.00	7/26/2022	5	Review filed versions of docs and excel spreadsheets submitted to court. Review email to court attaching Excel docs and draft email to Tim re: whether to provide further explanation to Court.
MGR	0.30	\$875.00	\$262.50	7/26/2022	5	Draft email to clients re documents filed today.
MGR	0.20	\$875.00	\$175.00	8/2/2022	5	Telephone call with TF re: preparing for 8/15 hearing. .2
MGR	1.70	\$875.00	\$1,487.50	8/9/2022	5	Begin preparing for next Monday's hearing 1.1. Draft email to TF re: same. .2 Review order from court continue hearing and exchange emails with Tim re: same. .2 Draft email to clients re: same. .2
MGR	1.80	\$875.00	\$1,575.00	9/19/2022	5	Review Order Granting Motion for Prelim approval of settlement. 1.2. Draft email to clients re: same. .3. Review and respond to email from Lucinda Lopez re: same. .1 Telephone call with Andre Galvan re: same. .2

RRH Detailed Loadstar for Smashburger Case from Inception Through 12/2/22						
Atty	Time	Rate	Value	Date	Code	Description
MGR	0.30	\$875.00	\$262.50	9/23/2022	5	Review draft statement of proposed settlement deadlines and exchange emails with TF re: same.
MGR	0.60	\$875.00	\$525.00	9/28/2022	5	Review filed version of statement re: proposed future deadlines. .1 Exchange emails with TF re: preparing final approval motion and quickly look at template sent to me from Tim. ..5
MGR	0.30	\$875.00	\$262.50	9/29/2022	5	Review opinion issued yesterday by 9th Cir in an Apple case re: legal standard for reviewing pre-class cert settl agreements.
MGR	0.20	\$875.00	\$175.00	9/29/2022	5	Telephone call with TF re: final approval motion .2
MGR	1.00	\$875.00	\$875.00	10/6/2022	5	Review Court docket. .1 Draft email to clients attached statement we filed with the court last week. .2 Exchange emails with Rob Meyer re: benefits under the settlement agreement and review settlement agreement re: same. .4 Draft email to TF re: same. .2. Review and respond to email from him re same. .1
MGR	0.50	\$875.00	\$437.50	10/19/2022	5	Review doc 76, Order setting deadlines related to fairness hearing. Calendar same. Exchange emails with TF re: same. Draft email to clients re: same.
MGR	0.10	\$875.00	\$87.50	10/25/2022	5	Exchange emails with TF re: claims made to date.
Total	190.20		\$163,285.00			

Categories: (1) Pre-suit investigation/complaint; (2) case management; (3) leadership; (4) discovery; and (5) settlement.

EXHIBIT C

Reich Radcliffe & Hoover LLP - In re Smashburger IP Holder Hours Summary Through 12/2/2022				
Total Lodestar				
ATTORNEY	TITLE	HOURS	RATE	TOTAL
Marc G. Reich, Esq. (MGR)	Partner	167.2	\$875	\$146,300.00
Adam T. Hoover (ATH)	Partner	18.8	\$775	\$14,570.00
Byron S. Ahn (BSA)	Associate	4.2	\$575	\$2,415.00
		190.2		\$163,285.00
			Expenses:	\$105.88
			Total:	\$163,390.88

Reich Radcliffe & Hoover LLP - In re Smashburger IP Holder Hours Summary Through 12/2/2022				
Pre-Suit & Pleadings				
ATTORNEY	TITLE	HOURS	RATE	TOTAL
Marc G. Reich, Esq. (MGR)	Partner	38.5	\$875	\$33,687.50
Adam T. Hoover (ATH)	Partner	2.5	\$775	\$1,937.50
		Total:	41.0	\$35,625.00

Reich Radcliffe & Hoover LLP - In re Smashburger IP Holder Hours Summary Through 12/2/2022				
Case Management				
ATTORNEY	TITLE	HOURS	RATE	TOTAL
Marc G. Reich, Esq. (MGR)	Partner	8.5	\$875	\$7,437.50
Adam T. Hoover (ATH)	Partner	1.3	\$775	\$1,007.50
		Total:	9.8	\$8,445.00

Reich Radcliffe & Hoover LLP - In re Smashburger IP Holder Hours Summary Through 12/2/2022				
Leadership				
ATTORNEY	TITLE	HOURS	RATE	TOTAL
Marc G. Reich, Esq. (MGR)	Partner	16.3	\$875	\$14,262.50
Adam T. Hoover (ATH)	Partner	0.7	\$775	\$542.50
		Total:	17.0	\$14,805.00

Reich Radcliffe & Hoover LLP - In re Smashburger IP Holder Hours Summary Through 12/2/2022				
Discovery				
ATTORNEY	TITLE	HOURS	RATE	TOTAL
Marc G. Reich, Esq. (MGR)	Partner	22.0	\$875	\$19,250.00
Adam T. Hoover (ATH)	Partner	3.0	\$775	\$2,325.00
Byron S. Ahn (BSA)	Associate	4.2	\$575	\$2,415.00
		Total:	29.2	\$23,990.00

Reich Radcliffe & Hoover LLP - In re Smashburger IP Holder Hours Summary Through 12/2/2022				
Settlement				
ATTORNEY	TITLE	HOURS	RATE	TOTAL
Marc G. Reich, Esq. (MGR)	Partner	81.9	\$875	\$71,662.50
Adam T. Hoover (ATH)	Partner	11.3	\$575	\$6,497.50
Total:		93.2		\$78,160.00

Reich Radcliffe & Hoover LLP - In re Smashburger IP Holder Hours Summary Through 12/2/2022

ATTORNEY	RATE	TASK	HOURS	TOTAL
Marc G. Reich, Esq. (MGR)	\$875	Pre-Suit and Pleadings	38.5	\$146,300.00
		Case Management	8.5	
		Leadership	16.3	
		Discovery	22.0	
		Settlement	81.9	
Adam T. Hoover (ATH)	\$775	Pre-Suit and Pleadings	2.5	\$14,570.00
		Case Management	1.3	
		Leadership	0.7	
		Discovery	3.0	
		Settlement	11.3	
Byron S. Ahn (BSA)	\$575	Pre-Suit and Pleadings	0.0	\$2,415.00
		Case Management	0.0	
		Leadership	0.0	
		Discovery	4.2	
		Settlement	0.0	

Total Firm Lodestar \$163,285.00

Expenses \$105.88

Total Value of Time and Expenses \$163,390.88