

EXHIBIT B

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LAW OFFICES OF
 STEFAN COLEMAN P.A.

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 Stefan Coleman

Invoice #	0001270
Invoice Date	June 29, 2016
Balance Due (USD)	\$334,831.49

Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[GMRS 12/14/12] Initial client contact with Henry G regarding calls he is receiving from Global Marketing Research Services. Researched whether they could call him even though he is on the national do not call list. (.4) Spoke to him about autodialer sounds and how they may have gotten his phone number. (.4)	450.00	0.8	360.00
Communication	[GMRS 12/15/12] Spoke with Henry G about the ongoing calls from Defendant to obtain more facts.	450.00	0.5	225.00
Communication	[GMRS 12/19/12] Spoke with Henry G about how this company may have gotten his phone number and consent from him.	450.00	0.4	180.00
Communication	[GMRS 12/20/12] Client communication with Henry G regarding ongoing calls and how to stop the calls. Discussed class action process and his involvement	450.00	0.7	315.00
Communication	[GMRS 12/29/12] Client follow up with Henry G regarding pursuing class action process.	450.00	0.5	225.00
Research	[GMRS 04/29/13] Client call log retrieval and research of a year's worth of call logs from Henry G.	450.00	0.8	360.00
Research	[GMRS 05/11/13] Client contact and research with Maggie N. Got her call logs and history with her receiving calls from Global Marketing Research Services. Research into the company making the calls.	450.00	1.3	585.00
Communication	[GMRS 09/12/13] Initial contact with Ali T. Went over the history of the calls she's receiving. Spoke to her about whether she is on the do not call list. Also researched whether this company is using an autodialer and whether she experienced signs of an autodialer on the calls she picked up.	450.00	1.2	540.00
Communication	[GMRS 11/20/13] Initial client contact with Bill F. Went into whether he gave this company consent and his history of receiving calls with them. Spoke about participating in class action case. Research to corroborate the facts he presented.	450.00	1.3	585.00
Research	[GMRS 01/09/14] Follow up with Bill F about the calls from GMRS. Worked on retrieving his call logs and determining whether the calls came to both his cell phone and landline.	450.00	0.7	315.00

Task	Time Entry Notes	Rate	Hours	Line Total
Research	[GMRS 02/02/14] Client contact with George G. Went over his DNC registration, how many calls he has received, and whether he gave this company consent to call him. Research into whether he would be an appropriate lead plaintiff.	450.00	0.9	405.00
Research	[GMRS 02/02/14] Initial client contact with Michael C. He is receiving multiple calls per day on his cell phone which is interrupting his work. They identify that they are doing market research however the question is where that they are making dual-purpose calls. Michael asked and wants to know what he can do to stop the calls and this company. Researched other complaints about this phone number. Discovered website which shows that there are over 25 pages of complaints against company. I went through each page of the complaint website to understand the commonality of the calls. I went over with Michael what he can do next time they call to get more information from them about their calling campaign. I spoke to him about the class action process and the role of the lead plaintiff.	450.00	2.1	945.00
Communication	[GMRS 02/03/14] Follow-up call with Michael C. He received two calls today from GMRS. He listened and heard something like a recorder or a machine of some sort. When he picked up the call it disconnected. The call was about 5 to 10 seconds long. I spoke to him about his interest in participating in a class action to stop the company. Reviewed the retainer agreement with him. Discussed with him again his responsibilities acting as lead plaintiff to the class.	450.00	1.4	630.00
Communication	[GMRS 02/08/14] Jeff F heard dead air when he picked up the calls. Worked with him to obtain call logs as proof of the calls and the number of calls he received. Went over autodialer claims with him. Researched what items need to be alleged in the complaint to allege the calls were made by an autodialer.	450.00	1.3	585.00
Research	[GMRS 02/09/14] Client contact with Jeff F. Research whether there can be a DNC violation for political calls. Case law research into whether there have been any violation of DNC claims regarding political calls. Case law research regarding dual purpose calls.	450.00	2.3	1,035.00
Communication	[GMRS 02/10/14] Further client contact with Jeff F. about finding out from his carrier how many calls he has received.	450.00	0.4	180.00
Research	[GMRS 02/13/14] Initial client contact with Bill M. Research to find out who they were calling on behalf of. Research to determine if the calls to him were political or for some other purpose. The calls were to his cell phone. Client input into whether he heard autodialer signs. Discussed with him whether he has given a company like this consent to call him.	450.00	1.2	540.00

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Communication	[GMRS 02/16/14] Follow-up contact with Michael C regarding any more calls from GMRS and his interest in participating in a possible class action.	450.00	0.4	180.00
Communication	[GMRS 02/16/14] Client follow up with Bill M. Asked him to speak to operator and find out why they were calling. They were calling about market research. Research to discover if this company is making political calls or also marketing calls. Discussed with him whether he has given this company consent to call him. Discussed with him whether he wants to participate in a class action against this company.	450.00	0.9	405.00
Communication	[GMRS 02/25/14] Client contact with Deborah T. She heard autodialer noise when she picked up the call. She is getting the calls on her cell phone. Spoke to her about the amount of calls she has received and if she has told them to stop calling her. Discussed with her about possibly participating in a class action against the company and her responsibilities and duties as a potential lead plaintiff.	450.00	1.2	540.00
Communication	[GMRS 02/25/14] Client contact with Mary S. They are calling her multiple time per night. Went over her DNC rights and claims. Wants to get the calls to stop. Wants to figure out how to stop the calls on landline. Researched whether there were any successful cases for dual purpose calls violating DNC rules.	450.00	1.3	585.00
Communication	[GMRS 02/26/14] Initial client contact with John M. who is receiving three calls a night. He said that they claim they are a marketing company. Researched whether GMRS makes calls on behalf of businesses which would expand the case to include them as a telemarketer and invoke the DNC regulations. Spoke to John about whether he gave this company consent to call him. Research into what types of companies GMRS makes calls on behalf of.	450.00	2.4	1,080.00
Communication	[GMRS 03/02/14] Client contact with Stan J. They are calling him day and night. He wants the calls to stop and to start a lawsuit. Initial research into whether he gave this company consent to call him. Went over the amount of times he has been receiving their calls, retrieved his call logs, and explained to him the class action process.	450.00	0.8	360.00
Communication	[GMRS 03/03/14] Follow up with client John M. regarding his receiving more calls from this company. Went over questions he had about how to stop the calls and what would be involved in a class action.	450.00	0.5	225.00
Research	[GMRS 03/04/14] Follow up with client Stan J. They are calling on his cell phone. He needs to find out which political org or main company they are working for. He suspects that they are selling his information to data brokers. Research into other	450.00	0.8	360.00

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	cases that made similar claims in the TCPA context and their outcomes.			
Communication	[GMRS 03/13/14] Follow up with client Stan J. regarding whether he was still receiving calls from GMRS. Asked him whether they used the name GMRS or some 3rd party company that they were making the calls on behalf of. Spoke to him more about his interest in participating in a law suit to stop the company calling him. Answered his questions and concerns about the class action process.	450.00	0.9	405.00
Communication	[GMRS 03/18/14] Client contact with Noni B. She is receiving calls constantly from 800-251-5850. Spoke to her about her history of receiving calls from this company. Spoke to her at length about which companies may have hired this company to call on their behalf. Discussed with her how to find out who they were calling on behalf of. Went over with her how she may have given consent to this company to call her.	450.00	1.3	585.00
Research	[GMRS 03/19/14] Client contact with Susan W. They are calling her more than three times per day. She has told them to stop calling her. Spoke to her about how to stop the calls and what legal action she can take. Researched class claims alleging a class that specifically told the caller to stop yet continued to receive autodialed calls. Compiled complaints online of others who have told this company to stop yet reported receiving more calls from them.	450.00	1.3	585.00
Communication	[GMRS 03/19/14] Client contact with Melanie W regarding the calls she is receiving from GMRS. Investigated consent issues with Melanie. Discussed with her my research on the company calling her. Went over with her how to evidence the calls and how to retrieve her answered calls from the phone company. Spoke to her about the class action process and what would be required of her to act as lead plaintiff on behalf of a class.	450.00	1.2	540.00
Communication	[GMRS 03/20/14] Follow up with client Melanie W. Went over the call logs. Asked her whether she heard signs of an autodialer when she would pick up their calls. Revisited issues of her acting as lead plaintiff in a case against GMRS and her responsibilities as a potential lead plaintiff to the class.	450.00	0.8	360.00
Communication	[GMRS 03/21/14] Client contact with Joyce for her unwanted calls from 800-251-5850. Went over how many calls she received, whether she gave them consent, and how to stop the calls.	450.00	0.8	360.00
Communication	[GMRS 03/24/14] Went over Melanie W's role as lead plaintiff in class action. Answered all of her questions regarding the class action process. Went over how a class action process works. Went over the retainer agreement with her. Answered her questions regarding the retainer agreement. Sent the retainer	450.00	2.3	1,035.00

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	agreement to her. Went over the evidence of the calls with her. Started doing preliminary research on the company making the calls.			
Pleadings, Motions, or Other Writing	[GMRS 04/01/14] Reviewed signed retainer agreement from Melanie W. Organized her facts to be drafted into the class action complaint.	450.00	1.6	720.00
Research	[GMRS 04/01/14] Research into Polling.net and its relationship with Diana.	450.00	0.9	405.00
Communication	[GMRS 04/03/14] Initial client contact with Eric M. He is receiving multiple calls on his cell phone regarding GMRS. I spoke to him about participating as a lead plaintiff in a possible class-action suit against GMRS. Answered his questions about the process regarding his role as lead plaintiff. Went over his history of prior litigation. I saw his call logs that evidenced his stop requests. Follow up research on his facts. Case law research of stop call claims.	450.00	1.5	675.00
Communication	[GMRS 04/06/14] Initial client contact with Betsy H. She is receiving five calls per day on her cell phone. They are calling her as early as 8:30 AM as as 9:45 PM. Researched do not call rules related to times of the day a telemarketer can call you and the causes of action for failure to comply with those regulations. Every time she answers the call she does not hear anyone on the other end. I explained to her about the class-action process and discussed with her whether she would be willing to serve as a lead plaintiff in a case against GMRS.	450.00	0.8	360.00
Communication	[GMRS 04/08/14] Client contact with Lindsay D. She picked up the calls and heard signs of an autodialer. Spoke to her about their calls and how they never leave a message. They have called her numerous times. Went over with her how to stop the calls and explained the class action process. Worked with her to get call records of the total number of calls she has received from them. Discussed with her whether she would be willing to take part in a class action.	450.00	1.2	540.00
Communication	[GMRS 04/19/14] Interview with Maryann M. Went over her call logs that she has been receiving from GMRS. Explained to her the class action process and what we would need from her to get involved. Walked her through the class-action process. Answered her questions regarding her role as lead plaintiff. Went over with her the information I have so far uncovered about the company calling her.	450.00	1.3	585.00
Communication	[GMRS 04/21/14] Client contact with Victoria L. These calls are interrupting her sleep. She notes that no human is ever on the line. She said that she can't figure out how to stop the calls. If she calls back it says she can only opt-out on their next call but when she answers the phone no one is on the line. Spoke to her	450.00	1.1	495.00

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	about my investigation into this company and their calls. Discussed with her my interest in bringing a class action against this company and whether she would be willing to participate in a class action against them. Spoke to her about the class action process.			
Communication	[GMRS 04/22/14] Follow up with Victoria L. Explained the class action process in more detail. Went over the legal difference between survey calls to landline and cell phone calls. Explained to her how survey calls to cell phones are protected by the Telephone Consumer Protection Act but not on the landline.	450.00	0.9	405.00
Communication	[GMRS 04/22/14] Follow up with Noni B. Went over her recent call logs with her. Discussed the class action process with her.	450.00	0.6	270.00
Communication	[GMRS 04/23/14] Follow up with Victoria L. Went over how to stop this caller. She sees this as pure harassment. All she hears is "robo-noises" and they continue to call her. Spoke to her about getting calls on her cell phone and how to send all the call records over to me. Worked with her to retrieve her call records.	450.00	1.3	585.00
Communication	[GMRS 04/26/14] Initial client contact with Mary T to obtain the facts of her potential case. She is receiving multiple calls per day from GMRS. Whenever she answers the phone no one speaks. They asked for her name and whenever she is able to speak to somebody they state they are only doing a short survey. She tells them she's not interested and to stop calling. Even so, they continue to call her multiple times per day. Discussed with her my research and whether she would be interested in serving as lead plaintiff in the case. (1.1) Researched recent TCPA decisions in her jurisdiction. (1.2)	450.00	2.3	1,035.00
Communication	[GMRS 04/27/14] Client contact with Chad S. The number is calling his cell phone twice within an hour. They have called him many times in the past few weeks. Whenever he answers, no one is on the other line. Spoke to him about class action process and whether he would be willing to act as a lead plaintiff or at least as a possible witness. Worked with him to get his phone records.	450.00	1.2	540.00
Research	[GMRS 04/29/14] Initial client contact with Robert M. He is reporting hang up calls. He is on the do not call list. Researched relationship between polling.net and GMRS. Research whether these are two distinct entities and who is making the calls and also which one is the main company. Worked with Robert M. to get his screenshots of receiving the calls.	450.00	1.3	585.00
Communication	[GMRS 05/01/14] Client contact with Gaye T. He is bothered since he keeps answering and no one is on the line. Went over whether he got the calls on his cell phone or landline and whether he has told them to stop calling in the past. Spoke to him about whether he wanted to participate in a class action	450.00	1.3	585.00

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	against the company calling him. Went over issues that may affect his ability to be an appropriate class representative. Spoke to him about how this company may have obtained his consent.			
Communication	[GMRS 05/08/14] Client contact with Sandy P. She is on the Federal do not call list and yet gets several calls per day from 800-251-5850. Spoke to her about the class action process. Initial research into recent TCPA cases in her jurisdiction.	450.00	0.9	405.00
Communication	[GMRS 05/13/14] Client contact with Yuriy M. She is getting called on her landline. She says she is being harassed and needs help. Spoke to her about how to get these calls to stop. I explained to her that autodialed calls to a landline are legal, just not to a consumer's cell phone. Spoke with her about others she knows who are receiving these types of political calls on their cell phone. Investigated her call logs to determine if they are also calling her cell phone or only on her landline.	450.00	1.2	540.00
Communication	[GMRS 05/20/14] Client contact with Arthur C. He has answered many of their calls and no one is on the line when he answers. Went over with him how many calls he received and whether he told them to stop calling. Helped him to obtain his call log data. Further research into a no-consent class and how to establish with data a stop-call class.	450.00	1.1	495.00
Communication	[GMRS 05/21/14] Client contact with Marcel J. He identified the company that is calling him as Global Marketing Research Solutions. Spoke to him about participating in class action process. Spoke to him about whether he answered calls, what he heard on the call, and how many times they called. Reviewed and analyzed his call logs.	450.00	1.2	540.00
Communication	[GMRS 05/22/14] Client contact with Pat M. She called these calls 'robocalls' since no one was answering, there was just 'dead air.' Spoke to her about how many calls she has received and whether she gave this company consent to call her. Research into whether she may have given another company consent to call her that gave this company consent. Went over with her, her interest in participating in a class action. She asked questions about the class action process and the timeline. Answered her questions and decided we would use her as backup plaintiff in this case.	450.00	1.3	585.00
Communication	[GMRS 05/27/14] Follow up with client Robert M. He is reporting that they call him 2-3 times a day still. Whenever he answers their calls, they hang up. Discussed with him more about the class action process and his role as a lead plaintiff. He agreed to participate and I verified his facts with him. Researched recent TCPA cases in his jurisdiction.	450.00	1.2	540.00
Communication	[GMRS 05/29/14] Interview with Larry B. regarding the calls he is receiving from GMRS. Whenever he picks up their calls, no	450.00	0.8	360.00

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	one answers. Went over class action process and whether he would serve as class representative. Reviewed and analyzed his call logs to determine if we can establish a stop-call class.			
Research	[GMRS 06/09/14] Research into the best jurisdiction to file this TCPA case with the current list of individuals who I am in contact with. Case law research of recent TCPA decisions and TCPA settlements in New Hampshire, North Carolina, Florida, New York, California, Texas, and Pennsylvania to determine the best jurisdiction to file this case in.	450.00	4.3	1,935.00
Communication	[GMRS 06/10/14] Initial client contact with Victoria K. She is receiving several calls per day from GMRS on her cell phone even though she is on the DNC. Went over with her whether she heard signs of an autodialer. Spoke to her about the class-action process and her interest in participating in the class action. Worked with her to retrieve her call logs.	450.00	1.3	585.00
Communication	[GMRS 06/11/14] Follow up call with Victoria K. When she spoke to GMRS, they were asking for the head of her household. They said they were conducting a survey. She told them to take her name off their list. She wanted to know what other information would be needed to file a case against them. Reviewed and analyzed screenshots of her call logs to determine her claims. Organized her facts.	450.00	0.8	360.00
Research	[GMRS 06/11/14] Research into which entities such as GMRS and Kalamata Research are related and who to name in the complaint. Research into GRMS, Kalamata Research, The Strategy Group, and Polling.net. Factual research to determine whether the companies share the same officers and how interrelated they are. (2.5) Factual research to determine whether to name Anthony Diana. (1.3)	450.00	3.8	1,710.00
Research	[GMRS 06/12/14] Online research into other complaints filed by consumers against GMRS and Kalamata Research for the calls. (1.8) Compiled complaints and categorized them for use in the complaint. (.8)	450.00	2.6	1,170.00
Research	[GMRS 06/14/14] Case law research to determine what level of specificity I need to allege joint control from multiple entities and their principle. (1.4) Drafting language to use in the complaint to tie the entities together. (1.3)	450.00	2.7	1,215.00
Research	[GMRS 06/15/14] Research regarding information to gather to determine if GMRS uses an autodialer. Looked at evidence from clients who have contacted me and statements made by GMRS themselves on their website and other places online. (2.1) Researched Calltrol corporation's dialers and whether they fit into the definition of an ATDS according to the TCPA. (1.2)	450.00	3.2	1,440.00
Research	[GMRS 06/16/14] Case law research on successful autodial class definitions that have overcome a motion to dismiss. (1.4)	450.00	2.2	990.00

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	Research into recent TCPA settlements and the specificity of their allegations of the autodialer. (.8)			
Research	[GMRS 06/17/14] Case law research into recent autodialer cases in Florida. (1.4) Organized research and analyzed the information I have from factual research to determine the best allegations to include in the complaint alleging their use of the autodialer. (.6)	450.00	2	900.00
Communication	[GMRS 06/17/14] Initial client contact with Rosie O. They are calling her several times per day on her cell phone. They are not leaving a message and she is registered on the do not call list. Worked with Rosie to find out if they are making the calls for political purposes or for marketing purposes. Spoke to her about why this difference matters so that we can open up the case to a landline class. Discussed with her where I am in the research to bringing a class action against the company calling her.	450.00	0.8	360.00
In-Person Appearances	[GMRS 06/18/14] Follow up with client Rosie O. Spoke to her about class action process and the responsibilities of a class representative.	450.00	0.5	225.00
Communication	[GMRS 06/19/14] Client contact with Seth P. Went over the multiple political calls he has been receiving despite his registry on the DNC. Spoke to him about class action process. Worked with him to do factual research to determine if he was receiving these calls because of his registration with a political or religious organization.	450.00	1.1	495.00
Research	[GMRS 06/21/14] Client contact with Chris P. He is getting multiple call per week from GMRS. Went over that he is getting calls on his cell phone and doesn't know how to stop the calls. (.7) Researched what the opt-out process is to stop these calls. Researched whether they are any opt-out procedures in place for any of the consumers. (.3) Factual research to see the extent that others are complaining about not being able to stop the calls after trying to opt-out. (.7)	450.00	1.7	765.00
Communication	[GMRS 06/21/14] Client contact with Kathleen L. She is receiving multiple calls per day and whenever she answers their calls no one is is on the line. Spoke to Kathleen about whether she has tried to opt-out through any automated system or was even given the choice. Spoke to her how she could participate in the class action. Went over the class action process with her.	450.00	0.9	405.00
Communication	[GMRS 06/21/14] Client contact with Milton S. Initial contact to find out the nature of the calls and whether they are calling him for political or business reasons. Factual research with him to determine where he may have given out his phone number that resulted in him receiving the calls.	450.00	0.5	225.00
Communication	[GMRS 06/21/14] Initial contact with Shelli T regarding the calls she is receiving from GMRS. Went over with her my current	450.00	1.3	585.00

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	research on the case and how we could stop the calls for her. Discussed with her the class action process. Factual research to determine in which states she received the calls. Initial case law research into TCPA cases filed in Massachusetts to determine if Massachusetts would be a beneficial place to file this case.			
Communication	[GMRS 06/22/14] Client follow up Milton S. Reviewed and analyzed his call logs to determine the number of calls he received. Went over the class action process with him to determine if he was willing to act as a class representative.	450.00	0.9	405.00
Communication	[GMRS 06/23/14] Interview with Scott S. about the calls he has been receiving for weeks from GMRS. They call him everyday and twice this morning. Went over his attempts to stop the calls and the different times of the day that they are calling. Went over whether he has given this company consent to call him or whether he has even heard of this company. Updated him on my investigation of this company so far. Showed him how to take screenshots of the calls.	450.00	0.7	315.00
Communication	[GMRS 06/23/14] Client follow up with Shelli T. Worked with her to get her full call logs. (.5) Answered questions about the class action process and her role in it. Spoke to her about her experience in litigation and the class action process. (.5)	450.00	1	450.00
Communication	[GMRS 06/23/14] Interview with Janet R. Research to discover how they may have gotten her phone number. Updated her on my investigation so far. Discussed with her whether she would be willing to take part in a class action against the caller.	450.00	0.5	225.00
Communication	[GMRS 06/23/14] Initial client interview with Barbara H. She is receiving numerous calls per day from GMRS. She has been receiving these calls for weeks from GMRS. Reviewed and analyzed her proposed complaint to file with the BBB. I spoke to her about the research that I've done on so far and my theory of the case. I spoke to her about the class action process and asked her if she would be willing to participate. We discussed her responsibilities and involvement in the class action process.	450.00	0.8	360.00
Communication	[GMRS 06/24/14] Interview with possible client Marc L. Reviewed his call logs with him. They do not leave voicemails so he was confused why he didn't have more evidence of their calls. Interviewed him for more evidence of GMRS using an autodialer when they would call him. Asked him whether he has ever heard of this company or somehow given them his information. Factual research with Marc L. to determine from which source they likely got his phone number from.	450.00	0.9	405.00
Communication	[GMRS 06/27/14] Interview with Jessica M. The calls were coming in on her cell phone from GMRS. She notes they have called several times over the past few weeks and she is frustrated that she sees no way of stopping their calls. Spoke to	450.00	0.8	360.00

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	her about the class action process and whether she would participate as lead plaintiff. Case law research into the recent TCPA decisions from her jurisdiction.			
Communication	[GMRS 06/29/14] Contact with Molly M regarding the calls she is receiving from GMRS. She is receiving multiple calls daily on her cell phone. Went over with her my research with her. Asked her if she may have signed up to receive these types of calls. Vetted her to discern whether she may have given consent to receive survey calls. Answered her questions regarding the timeline of a typical class action case.	450.00	0.7	315.00
Communication	[GMRS 06/30/14] Client contact with David S. regarding the calls to his cell phone from Global Marketing Research Services. Went over whether he has received political and/or business calls from them. Went over the class action process with him. He decided he did not want to participate as a lead plaintiff.	450.00	0.4	180.00
Communication	[GMRS 07/06/14] Client contact with Nancy G. Went over consent issues and the class action process. Asked for her call logs. Asked her to find out why they were calling her the next time they call her. Requested screenshots of the calls that she has received. Described the class action process to gauge whether she would want to participate as a lead plaintiff.	450.00	0.7	315.00
Communication	[GMRS 07/08/14] Interview with Joshua C. Went over consent issues, whether he heard sounds of an autodialer, and whether he would participate in the class action against GMRS. Factual research to determine if he was charged by his phone carrier for their incoming calls.	450.00	0.7	315.00
Communication	[GMRS 07/12/14] Interview with Alicia H. Went over consent issues, whether she heard any evidence indicating an autodialer, and her willingness to participate in the class action.	450.00	0.6	270.00
Communication	[GMRS 07/13/14] Client contact with Wendy C who is receiving calls from GMRS. Went over their calls. Factual online research to find other complaints corroborating her experience. (.6) Continued factual research on connection between polling.net and GMRS. Reviewed and analyzed notes to determine whether to name them both as defendants or just GMRS. (1.2)	450.00	1.8	810.00
Communication	[GMRS 07/14/14] Interview with Kevin M regarding the calls from GMRS. Went over the ATDS issue with him. Went over whether he gave this company consent and researched the possible websites he may have given his consent over to. Also, went over his willingness to perform the lead plaintiff role after explaining to him my intention of filing a class action against this company and his possible role in it.	450.00	0.9	405.00
Communication	[GMRS 07/14/14] Interview with Julie T. regarding the calls she is receiving from GMRS. She did not give this company consent but it turns out that they are calling her on her landline. (.6)	450.00	1.4	630.00

Task	Time Entry Notes	Rate	Hours	Line Total
	Online research into whether political survey companies gather information from their calls, enter that information into a database to sell to political organizations, thereby profiting from the 'political calls. (.8)			
Research	[GMRS 07/14/14] Interview with Rob G regarding the calls he's been receiving from GMRS even though he's on the DNC. (.4) Case law research to determine how a VOIP number is treated under the TCPA. Additional research to determine how a VOIP number forwarded to a cell phone is treated under the TCPA. (1.4). Client follow up on whether he is charged for incoming calls to his VOIP number. Additionally discussed how he can stop these calls and to be in touch if he continues to receive more calls. (.3)	450.00	2.1	945.00
Research	[GMRS 07/15/14] Interview with Vicki B. regarding the calls she is receiving from GMRS. (.5) Researched which states have their own autodialed and telemarketing laws and whether to add those plaintiffs and states as additional classes to the case. (2.3)	450.00	2.8	1,260.00
Communication	[GMRS 07/15/14] Interview with April A. who is receiving calls from GMRS. She went over the damage that these calls from GMRS have cost her. They are calling her at different hours of the day which interferes with her sleep and her work. Also went over whether these calls are diminishing her cell phone minutes. Discussed with her the class action process and whether she would be willing to act as a lead plaintiff.	450.00	0.6	270.00
Communication	[GMRS 07/16/14] Interview with Kevin B regarding receiving calls from GMRS. He is registered on the DNC. He is also receiving calls at night even though he's on the DNC. Spoke to him about participating in a class-action case against GMRS. Spoke to him about whether he is a member of a political organization and whether they were calling on behalf of a political organization. (.9) Continued factual research into what political organization GMRS may be affiliated with that has hired them to make the calls. (.8)	450.00	1.7	765.00
Communication	[GMRS 07/16/14] Interview with client Tom C. who is receiving calls on his land line from GRMS which is forwarded to his cell phone. (.6) Researched case law regarding whether forwarded calls to cell phone are considered a call received by a cell phone under the TCPA. (.8)	450.00	1.4	630.00
Communication	[GMRS 07/17/14] Interview with client David B. He is on the DNC, yet he is still receiving almost daily calls including night calls from GMRS. He is very upset about the calls and wanted to know what immediate action could be taken to stop the calls. I explained to him my current investigation and how widespread the complaints are regarding this company. I informed him about the class action process and how the class action process can	450.00	1.2	540.00

Task	Time Entry Notes	Rate	Hours	Line Total
	be effective in stopping this company. Analyzed his facts to determine if he would be the best lead plaintiff.			
Research	[GMRS 07/18/14] Researched which entities to name in the GMRS complaint. (1.2) Researched all entities owned by Anthony Diana. (.6) Continued factual research of connections between GMRS and Polling.net. (.5) Researched Global Strategy Group and their possible relationship with GMRS. (1.5)	450.00	3.8	1,710.00
Research	[GMRS 07/19/14] Continued factual research on Anthony Diana's entities. Factual research of Bleeker Street Investments, On Target Research, Polling.net, Payroll.net, Kalamata Research Services, and GMRS to see whether they were all related and who should be named in the complaint. (2.3) Factual research into Diana's oversight and control of GMRS and Kalamata Research. (1.2)	450.00	3.5	1,575.00
Research	[GMRS 07/20/14] Case law research regarding what type of documentation and consent a company needs before autodialing consumers about political calls. (1.3) Researched and analyzed the FCC, warning survey companies not to autodial the cell phones of consumers. (.9) Researched all FCC reports regarding making non-telemarketing calls to cell phones. (1.2) Researched all FCC reports focused on restrictions of survey calls. (1.3)	450.00	4.7	2,115.00
Research	[GMRS 07/21/14] Researched and organized notes regarding the FCC 2012 Report and Order regarding autodialed calls to cell phones and its application to political calls to cell phones. Case law research into cases citing the FCC 2012 Report and Order.	450.00	2.8	1,260.00
Research	[GMRS 07/21/14] Continued case law research into the best states to file an autodialed survey call TCPA case. Case law research into whether California, New York, Massachusetts, Michigan, Texas, or Florida would be the best place to file this case given the individuals and their facts who have contacted me. (2.3) Online research to find the most recent TCPA settlements and review of the language of their class definition and allegations contained in their complaints. (1.3)	450.00	3.6	1,620.00
Research	[GMRS 07/22/14] Continued factual research to determine the extent of the calls being made by GMRS with an autodialer. (.7) Continued online research that Kalamata Research works with GMRS. Analysis to determine whether to name Kalamata Research. (.8) Online research regarding autodialing technology and database systems used by GMRS (.7)	450.00	2.2	990.00
Research	[GMRS 07/22/14] Organized, compiled, and analyzed notes to structure the complaint. (1.6) Drafted the common factual allegations. (1.4) Rough draft of the remaining sections of the complaint including Plaintiff's allegations. (2.1)	450.00	5.1	2,295.00

Task	Time Entry Notes	Rate	Hours	Line Total
Pleadings, Motions, or Other Writing	[GMRS 07/23/14] Review of draft of class action complaint with Melanie W. Verified the facts of her experience receiving calls from GMRS.	450.00	0.6	270.00
Pleadings, Motions, or Other Writing	[GMRS 07/24/14] Further research on class definition for case and whether to use subclasses (1.1). Researched Florida case law on pick offs and what would be required to make a viable class certification motion this early in the litigation (2.4). Began drafting class certification motion to protect the class from a pick off (3.6).	450.00	7.1	3,195.00
Communication	[GMRS 07/25/14] Interview with Malee T who is receiving daily calls from GMRS. Every time she answers the calls, the phone number hangs up on her signaling an autodialer. Until now she has not been able to stop the calls on her own. Discussed with her my research on this company and strategy for the class action case. Discussed with her the possibility of her acting as a backup lead plaintiff. She agreed to give me updates on all future calls.	450.00	0.8	360.00
Pleadings, Motions, or Other Writing	[GMRS 07/26/14] Edited new version of the complaint. Tightened up the language and allegations of the complaint. Checked for spelling and grammar. Checked all footnotes for accuracy. Confirmed formatting follows local rules.	450.00	2.3	1,035.00
Pleadings, Motions, or Other Writing	[GMRS 07/27/14] Continued drafting of the class certification motion. (2.4) Research on the procedure for filing class certification motion with the complaint. (.7) Case law research on the Judges in the middle district of Florida on their view of pick-offs to moot the lead plaintiff. (1.9) Research on Damasco's impact on the Middle District of Florida, cited in case law. (.9) Case law research including Dickerson v. Laboratory Corporation of America. (.8) Decided to hold off on filing the class certification motion until the Judge is assigned to the case. Once the Judge is assigned, depending upon their decision on picking-off lead plaintiffs, I will either file or not file the drafted class certification motion.	450.00	6.7	3,015.00
Communication	[GMRS 07/29/14] Interview with potential back-up client Perry T. She is getting numerous calls especially at night after 9 PM. Researched whether calls past 9 PM are a violation of the do not call rules and even a violation of her state rules. Spoke to her about the class-action process and her involvement in this process and where I am in the process of bringing a complaint against this company. Discussed that I will follow up with her about whether I will need her involvement going forward in a few months.	450.00	0.8	360.00
Communication	[GMRS 07/30/14] Interview with potential backup-client Gary W. He received numerous calls the last four days from GMRS. He claims that he hears a digital tone of some sort when he answers the calls and then it hangs up. He said said they're	450.00	0.6	270.00

Task	Time Entry Notes	Rate	Hours	Line Total
	using an autodialer. Spoke to him about the class-action process and whether he would be willing to act as a backup plaintiff if needed.			
Communication	[GMRS 07/31/14] Initial client contact with Matt B. He's receiving daily calls from GMRS. He's receiving these calls all times of the day. If he does not pick up the call, they will continue to call him every few hours throughout the day. He told them to stop calling a few times and yet they still keep calling him. They call him after 9 PM. He wanted to hear more about the class action process and what he could expect to receive from it. He also wanted to know how long after I file the case will the calls stop.	450.00	0.8	360.00
Communication	[GMRS 08/01/14] Follow up call and research with Matt B. He does not usually stay on the phone long enough to find out what they want from him. He believes that the calls are in reference to research and sales. He told me he told them to stop calling him last week and has received more calls since then. He was very clear with them to stop calling him. (.8) Discussed possibly adding him to the case for a stop calling class. (.6) Factual research on how telemarketers keep records of requests to opt out. (.9)	450.00	2.3	1,035.00
Pleadings, Motions, or Other Writing	[GMRS 08/02/14] Reviewed local rules for compliance and what to expect throughout the case.	450.00	1.2	540.00
Communication	[GMRS 08/03/14] Updated Melanie W about the status of the case and discussed what to expect after the case is filed.	450.00	0.8	360.00
Research	[GMRS 08/06/14] Factual research on the mechanics of random digit dialing and its impact on the definition of an autodialer. (.8) Case law research whether any other political auto dialed cases cited a random digit dialer and how it impacted their arguments for it facilitating their autodialer claim. (1.3)	450.00	2.1	945.00
Pleadings, Motions, or Other Writing	[GMRS 08/07/14] Reviewed final draft of complaint. (1.2) Factual research to figure out which address to serve GMRS and Anthony Diana. (.8) Drafted the civil cover sheet and summonses. (.6) Reviewed the civil cover sheet and summonses. (.3) Reviewed and checked all local rules for filing against the documents drafted. (.7) Drafted instructional cover sheet for the clerk and mailed out the packet to the clerk. (1.2)	450.00	4.8	2,160.00
Communication	[GMRS 08/09/14] Interview with potential backup-client Phyllis B. She received many calls from 800-251-5850. I spoke to her about status of the case and what we hoped to accomplish for the class in the case. I interviewed her to see whether she would be willing to be a backup plaintiff if called upon.	450.00	0.4	180.00
Pleadings, Motions, or Other Writing	[GMRS 08/11/14] Review of filed complaint. (.3) Analysis whether I should file the class certification motion now or wait to first speak with opposing counsel. (.5)	450.00	0.8	360.00

Task	Time Entry Notes	Rate	Hours	Line Total
Pleadings, Motions, or Other Writing	[GMRS 08/12/14] Drafted litigation hold letter and preservation letter. (1.3) Review of Summons to GMRS and Anthony Diana. Contacted process servers and worked out rate to serve both GMRS and Diana. Sent the documents to the process server. (.8)	450.00	2.1	945.00
Research	[GMRS 08/13/14] Researched and analyzed any opinions from Judge Presnell on the issue of picking off a lead plaintiff in a class action through an offer of Judgment. Reviewed and analyzed the Judge's opinion on the Neurocare Institute of Central Florida v. Healhtap, Inc and Jeffrey Pollard case. Decided not to immediately file a class certification motion to stop Defendant's possible attempts to pick off the lead plaintiff in light of the Judge's opinion in the Neurocare case.	450.00	1.4	630.00
Communication	[GMRS 08/13/14] Client contact with potential backup client Kristin A. regarding the calls she is receiving from GMRS. She alleges actual damage for the calls because they interfered with her work. Took notes of all of her facts regarding receiving unwanted calls from GMRS. Discussed the recent case I filed against GMRS and its impact on stopping the calls for her and the class. Spoke to her about being a backup plaintiff in this case and how she could help us in the class action by participating if called upon. Went over the class action process with her. Worked with Kristen to receive evidence of her calls through screenshots. Verified all of her facts.	450.00	1.4	630.00
Communication	[GMRS 08/14/14] Initial client contact with potential backup client Alex H. He's receiving numerous calls from GMRS even after 9pm. He is upset that these political callers continue to call him and when he picks up they hangup. He believes the calls are harassment and needs to be stopped. I informed him that I had recently filed a class-action case against this company and sought his approval to call upon him as backup plaintiff if needed. Went over class-action process with him and the relief sought in the case. Worked with him to get the call logs of the calls he has received from GMRS.	450.00	1.2	540.00
Pleadings, Motions, or Other Writing	[GMRS 08/14/14] Reviewed Related Case Order and Track Two Notice. Entered all deadlines into calendar. Worked on preparing for case management conference. Worked on notice of pendency of other actions document. Reviewed Notice, Consent, and Reference of a Civil Action to Magistrate Judge. Reviewed Interested Persons Order. Worked on drafting response to Interested Persons Order. Called client to ask her a few questions to fill out forms and to update her in the case. Reviewed local rules for compliance with above forms.	450.00	2.3	1,035.00
Pleadings, Motions, or Other Writing	[GMRS 08/28/14] Reviewed and analyzed Notice of Pendency form and Interested Person and Corporate Disclosure Statement. Finalized Notice of Pendency form and filed it.	450.00	1.2	540.00

Task	Time Entry Notes	Rate	Hours	Line Total
	Finalized draft of Interested Person and Corporate Disclosure Statement and filed it. Drafted and filed certificate of service.			
Research	[GMRS 09/02/14] Legal research on the impact of filing a corporate bankruptcy on a pending class action. Legal research on what happens to the claims of the putative class members when a defendant corporation files for bankruptcy. Legal research on methods to circumvent the corporate bankruptcy attempted to end the class action. Legal research on factors to lift the automatic stay in a chapter 11 bankruptcy. (2.6) Factual research to determine assets of GMRS to pay creditors including class members. (.8) Legal research on whether the class action is stayed even against the corporate individual who is also named as a Defendant in the class action though the defendant corporation has filed for corporate bankruptcy. (2.1)	450.00	5.5	2,475.00
Pleadings, Motions, or Other Writing	[GMRS 09/09/14] Reviewed and analyzed opposing counsel's motion for enlargement of time.	450.00	0.6	270.00
Pleadings, Motions, or Other Writing	[GMRS 09/10/14] Reviewed Defendant's corporate disclosure statement. Researched and analyzed names listed as interested persons such as Andrew Williams, David Larkin, and Jesse Kabaservice to determine their role and involvement in the case and in the calls.	450.00	2.8	1,260.00
Research	[GMRS 10/03/14] Reviewed and analyzed lengthy insurance documents to determine if the TCPA violations would be covered by the insurance policies. (4.8) Researched case law in FI on TCPA coverage for insurance. (2.4) Analysis of the terms of a proposed settlement in light of the insurance risks and analysis of strategy going forward without the settlement. (1.6)	450.00	8.8	3,960.00
Research	[GMRS 10/06/14] Further review and analyses of the insurance documents to determine if their language would cover the TCPA violations. (2.3) Further research and analysis into the insurance documents to determine how much insurance would be available if the insurance would cover the TCPA violations. (1.3) Review, analysis, and research of the insurance documents to determine if any exceptions would be carved out to block TCPA violations. (2.3) Researched Penzer v Transportation decision and analyzed it's probable impact on this insurance coverage both pros and cons. (1.4) Conferred with opposing counsel Jim Fallace about pursuing the insurance (.2)	450.00	7.5	3,375.00
Research	[GMRS 10/07/14] Reviewed yesterday's research regarding possible insurance coverage to determine whether the case has a probable outcome of insurance coverage given the case law and language of the insurance documents. Further case law research into insurance coverage given the insurance documents language, coverage limits, and exceptions.	450.00	2.3	1,035.00

Task	Time Entry Notes	Rate	Hours	Line Total
Research	[GMRS 10/07/14] Contacted clerk regarding filing a motion to extend. (.3) Researched the technical procedures for how the Defendant triggers the insurance coverage to bring the insurance company into the case. Research to understand the insurance company Old Dominion and their potential litigation style when defending insurance claims. Research to determine Old Dominion's participation and history in class actions litigation. (2.6) Communication with opposing counsel Jim Fallace. (.2)	450.00	3.1	1,395.00
Pleadings, Motions, or Other Writing	[GMRS 10/09/14] Edited and filed unopposed motion to extend time until November 21 to meet regarding rule 26f. (.8) Reviewed local rules to see if we could meet by phone instead of in-person. (.7)	450.00	1.5	675.00
Pleadings, Motions, or Other Writing	[GMRS 10/10/14] Reviewed order granting motion to extend time for rule 26f conference. Scheduled CMR deadline. Reviewed information necessary to complete CMR.	450.00	1.4	630.00
Pleadings, Motions, or Other Writing	[GMRS 10/11/14] Reviewed and analyzed both Motions to Dismiss the Complaint.	450.00	2.3	1,035.00
Research	[GMRS 10/12/14] Case law research regarding consent is an affirmative defense. (1.8) Case law research regarding autodialed calls are a violation of the TCPA even if not commercial calls. (1.7) Review and analysis of FCC orders showing that autodialed non-commercial calls that are autodialed are a violation of the TCPA. (1.9)	450.00	5.4	2,430.00
Research	[GMRS 10/13/14] Case law research on whether need to include in the complaint that the Plaintiff's phone number was not ported from a landline (.9) Client communication with plaintiff to verify the amount of calls she received from Defendant and updating her on the status of the case. (.8) Research on amending as a matter of right. (.5) Case law research regarding the harm necessary for standing under the TCPA, if at all, based on motion to dismiss and in this District. (1.6) Analysis and strategy regarding the timing of amending the complaint to address a few of the issues raised in the motion to dismiss. (1.4)	450.00	5.2	2,340.00
Research	[GMRS 10/14/14] Case law research in the TCPA context holding the owner/officer of the company liable for the TCPA violations. (2.6) Factual research into Diana's role in GMRS and how he controls their operation including their dialing. Further online research to see if there is anything linking Diana to the autodialing. (1.2)	450.00	3.8	1,710.00
Research	[GMRS 10/15/14] Case law research on piercing the corporate veil and its application to this case. (1.8) Researched factors and standards of holding owner of company liable for torts of a closely-held corporation. (1.5) Researched the specificity required to allege the owner of a company controlled the torts	450.00	4.8	2,160.00

Task	Time Entry Notes	Rate	Hours	Line Total
	created by the company. (.7) Drafting opposition to MTD to deal with piercing the corporate veil issues. (.8)			
Research	[GMRS 10/16/14] Research on Mais v. Gulf Coast case and its implication on the liability of a corporate officer. (.8) Case law research to see if alleging at this stage in the litigation is enough since this information is only known to Defendants. (1.4) Research case law cited in MTD regarding personal participation by corporate officers holding them liable for the TCPA violations. Analysis of cases to determine whether they apply to our case. (2.3)	450.00	4.5	2,025.00
Pleadings, Motions, or Other Writing	[GMRS 10/17/14] Reviewed and analyzed issue of whether the complaint could be considered a shotgun complaint. (.5) Case law research on effect of 'shotgun complaint.' (.6) Re-worked complaint to separate how, when, and who the allegations are against and whether to dismiss Diana from the case altogether. Analysis and strategy on whether to keep Diana as a Defendant in the case. (2.3)	450.00	3.4	1,530.00
Research	[GMRS 10/18/14] Researched issue raised in MTD regarding the motion to strike the complaints from third parties' comments in the complaint. Case law research and analysis to show that these complaints were being used not as hearsay but rather to the knowledge that the owner of GMRS and the corporation knew or should have known that their calls were violating the TCPA and that people did not consent to these calls. Research whether these complaints can be included in the complaint for that purpose.	450.00	1.3	585.00
Research	[GMRS 10/19/14] Further online research linking Diana to the control and oversight of the calling campaigns. (.7) Further analysis to determine whether to keep Anthony Diana in the case based on the facts that we have and the case law we researched or whether to allow him to be dismissed based on the evidence at this point in the litigation (1.3)	450.00	2	900.00
Research	[GMRS 10/20/14] Review of case law regarding constitutionality of the TCPA. Case law research on whether the TCPA is unconstitutional as applied to GMRS. (2.8) Case law research on whether the Wreyford v Citizens for Transportation Mobility assertion is correct or upheld by any other courts that a consumer can ok an autodialed call after she has answered the call though the TCPA specifically writes that callers must get prior written express consent to call. (1.8) Case research on whether political calls do not violate the TCPA if they are somehow immediately transferred to a live person. (1.7) Case law research on strict liability of TCPA and the effect of best reasonable efforts. (1.8)	450.00	8.1	3,645.00
Communication	[GMRS 10/20/14] Went over facts with potential backup plaintiff Michael P. He's receiving numerous calls. He hears what	450.00	0.5	225.00

Task	Time Entry Notes	Rate	Hours	Line Total
	appears to be a prerecord message. He is receiving 4 to 5 calls per day he's receiving these calls before 8 AM and as late as 9:30 PM. Went over the class-action process and how he may be helpful in getting involved if we need him going forward. Discussed with him what to expect if we would need him as a backup plaintiff.			
Research	[GMRS 10/21/14] Researched FCC document from 2012 which suggests that oral consent may be valid for autodialed cell calls but that you need some sort of consent. Researched regulations regarding the implementation. (1.2) Researched consent defenses to (b)(1)(A)(iii) and (b)(1)(B). (1.1) Researched what is required to maintain vicarious liability in TCPA context and check with facts regarding Diana. (.9) Drafted response addressing that the complaint is not a shotgun complaint. (.8) Drafted response that paragraph 20 should not be stricken (1.2). Drafted response that the constitutional challenge is an affirmative defense. (1.4)	450.00	6.6	2,970.00
Research	[GMRS 10/22/14] Further research on whether to keep Diana in the case or not. Research facts that I know of and whether we can overcome the motion to dismiss based on those facts and the researched case law. (1.7) Drafted stipulation of dismissal as to Diana (.4)	450.00	2.1	945.00
Pleadings, Motions, or Other Writing	[GMRS 10/23/14] Edited stipulation regarding Diana for opposing counsel.	450.00	0.2	90.00
Communication	[GMRS 11/03/14] Emailed opposing counsel Jim Fallace regarding setting up the Case Management Conference. Offered to complete it by phone.	450.00	0.2	90.00
Communication	[GMRS 11/11/14] Updated client Melanie W about the status and updates in the case since the last time we spoke.	450.00	0.8	360.00
Communication	[GMRS 11/12/14] Communication with opposing counsel Jim Fallace regarding replacement of The Schwartz Law Firm to replace him representing GMRS.	450.00	0.2	90.00
Pleadings, Motions, or Other Writing	[GMRS 11/12/14] Drafted stipulation motion for clarification regarding docket #14 endorsed order granting motion to extend time. Requesting deadline for the submission of the case management report. Researched whether I can meet with opposing counsel by phone.	450.00	1.2	540.00
Communication	[GMRS 11/13/14] Communication with opposing counsel Schwartz.	450.00	0.3	135.00
Pleadings, Motions, or Other Writing	[GMRS 11/17/14] Drafted and filed the motion for extension to submit the case management report.	450.00	0.6	270.00
Communication	[GMRS 11/18/14] Phone meeting with opposing counsel Schwartz. Review of notes and dates after the meeting	450.00	0.7	315.00

Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[GMRS 11/20/14] Communication with opposing counsel Jim Fallace of his withdrawal. (.2) Review of new deadline for joint case management conference due by 12/2/14. (.4)	450.00	0.6	270.00
Pleadings, Motions, or Other Writing	[GMRS 11/21/14] Drafted initial draft for case management report and sent to opposing counsel Schwartz.	450.00	2.3	1,035.00
Pleadings, Motions, or Other Writing	[GMRS 11/24/14] Review of GMRS' certificate of interested person and corporate disclosure statement.	450.00	0.4	180.00
Pleadings, Motions, or Other Writing	[GMRS 11/25/14] Review of OC Schwartz's correction to the case management report. Incorporated changes into the CMR.	450.00	0.5	225.00
Pleadings, Motions, or Other Writing	[GMRS 11/26/14] Review and edited final draft of CMR and filed case management report.	450.00	1.1	495.00
Pleadings, Motions, or Other Writing	[GMRS 12/01/14] Reviewed court's case management and scheduling order. Calendared all deadlines. (.9) Reviewed the implications of a case referred to mediation. (.4)	450.00	1.3	585.00
Research	[GMRS 12/02/14] Researched to see if I have any client's who signed a retainer or who contacted me who received calls in 2013. Organized all clients who want to participate in the class action case and where each one is located by state to see if they are still interested in participating now.	450.00	2.8	1,260.00
Research	[GMRS 12/02/14] Worked on getting clients signed up from other states in case we need to file in other jurisdictions to expand the discovery since GMRS will not release information from other states even though the complaint pleads a 'national class.' Also speaking to clients to see if we can trigger earlier years of insurance. Need to find out the earliest these clients were called. Researched Ali Thompson's facts for when she first reported the calls to me. Called Ali and spoke to her about the case. I updated her on all aspects of the case. I discussed with her the possibility filing a new case against GMRS in her state Pennsylvania. Explained to her the role of a lead plaintiff. Explained to her the responsibilities that she would have to the class as a lead plaintiff. I explained to her the value of filing a new case for a Pennsylvania class. Organized notes from discussion with her. Further case research into recent TCPA decisions in Pennsylvania.	450.00	1.4	630.00
Communication	[GMRS 12/03/14] Call with Shelli T to update her on the GMRS case. Went over why I wanted to possibly file a new case with her against GMRS. Went over the facts of her case with her. Spoke with her a lot about where she was located when she received the calls and where she is normally domiciled. We spoke about her expectations for the case. Went over the class action process. Worked with her to get her call logs. (1.3) Case law research regarding jurisdiction since she received calls in Massachusetts and New York. (1.0)	450.00	2.3	1,035.00

Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[GMRS 12/03/14] Follow up call with Maryann M from Virginia. Went over the current status of the case against GMRS. Went over her role as a possible new plaintiff against GMRS to be filed in Virginia. Went over what we would be accomplishing with the new case against GMRS. Went over with her any questions she had about her role in the process. Got her feedback on filing a new case. Went over the retainer agreement with her. Organized and edited her facts so that it is ready to be included in a new complaint.	450.00	1.1	495.00
Communication	[GMRS 12/03/14] Client contact with Mary T regarding the status of the current case against GMRS. Organized and edited her notes to be included in possible case against GMRS in New York.	450.00	0.4	180.00
Communication	[GMRS 12/03/14] Follow-up call with Ali Thompson regarding her involvement in the GMRS case. (.9) Went over the retainer agreement with her and coordinated her signing. Reviewed all evidence of the calls she received from GMRS. (.6) Reviewed her letter to her congressman regarding the spam calls she received from GMRS. (.3) Went over her expectations of the case. Organized all of her notes and her experience with this company in order to draft an initial complaint with her as lead plaintiff in Pennsylvania. (1.6)	450.00	3.4	1,530.00
Communication	[GMRS 12/03/14] Contacted Eric M regarding filing a new lawsuit against GMRS in Ohio. Informed him about the case we filed in Florida. Researched and analyzed his facts to better understand if he would be the best lead plaintiff if we bring an additional case.	450.00	0.4	180.00
Communication	[GMRS 12/03/14] Contact with Matt B from Michigan to discuss whether he would be interested in participating in a new case against GMRS in Michigan. Reviewed and analyzed his facts of his receiving calls from GMRS. (.6) Started drafting factual allegations of a complaint if we want to file another case in Michigan with Matt B. (.9)	450.00	1.5	675.00
Communication	[GMRS 12/03/14] Contact with Nicole Z regarding status of case of GMRS. Explained to her the value in bringing a California class against GMRS. Went over her facts. Went over consent issues. Went over with her the role as lead plaintiff in the case. Went over the retainer agreement with her. (.7) Reviewed and analyzed all of her evidence of the calls and her claims. (.7) Online research to explore whether she consented to the calls. (.5)	450.00	1.9	855.00
Communication	[GMRS 12/04/14] Follow up with Barbara H regarding the GMRS case. She is located in New York. I informed her about the ongoing case in Florida. Reviewed and analyzed her facts. Organized and drafted writeup of her facts to be included in a new complaint against GMRS.	450.00	0.5	225.00

Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[GMRS 12/04/14] Follow up call with Maryann M. Helped her get her call logs from the dates in question. Culled through her phone bills to mark all calls from GMRS. Outlined her facts to possibly be included as an additional plaintiff in Florida or a new case in Virginia.	450.00	1.7	765.00
Communication	[GMRS 12/04/14] Contacted Chad H. regarding updating him on the status of the case against GMRS. Organized and edited notes in case he is interested in filing a new case against GMRS.	450.00	0.4	180.00
Communication	[GMRS 12/04/14] Called Jennifer C regarding her possibly getting involved in a new class action against GMRS in Nebraska. I went over the current case that I have against GMRS now and where we stand. I spoke to her about some of the problems in the current case and how we could help the class by filing a new case with a Nebraska only class with her as lead plaintiff in Nebraska. I went over all aspects of her role as a lead plaintiff with her. I also went over the possible settlements goals with GMRS if we can overcome certain hurdles. Organized and drafted up factual allegations after the call.	450.00	0.9	405.00
Communication	[GMRS 12/04/14] Spoke with Robert G regarding the calls he received from GMRS a few months back. Updated him on the case in Florida and whether he would be willing to either be added as another lead plaintiff in Florida or in a new case in Texas. Reviewed and analyzed his facts with him. Organized and edited his facts to be used as a new plaintiff in Florida or a new case in Texas.	450.00	1.2	540.00
Communication	[GMRS 12/04/14] Spoke with client Kristin A regarding updates in the GMRS case. Spoke to her about her substituting in as lead plaintiff in the Florida action. Updated her on the current status of the GMRS case. Went over the possibility of her having her deposition taken. Went over the retainer agreement with her. Discussed what she could expect throughout the case. (.8) Worked with her to get her phone records to evidence the calls in addition to her screenshots. (.6) Organized and edited initial draft of her facts to be included into the complaint. (.8)	450.00	2.2	990.00
Communication	[GMRS 12/05/14] Follow-up contact with client Michael C. I explained to him the current status of the class action complaint against GMRS. Organized and edited his facts to possibly be included in a new draft complaint to be filed against GMRS.	450.00	0.6	270.00
Communication	[GMRS 12/05/14] Contacted client Betsy H regarding filing a case against GMRS in Georgia. Organized and edited her facts to be included in a draft complaint for a Georgia only class.	450.00	0.4	180.00
Discovery	[GMRS 12/06/14] Outline of materials and evidence to seek in discovery.	450.00	1.3	585.00

Task	Time Entry Notes	Rate	Hours	Line Total
Discovery	[GMRS 12/07/14] Drafting discovery (.8) Reviewing FCC decisions on political calls (.4) and drafted proposed RFPs to GMRS. (.2)	450.00	3.9	1,755.00
Communication	[GMRS 12/08/14] Updated client Melanie W about the status of the case. Went over her need to keep and preserve all evidence including the cell phone that received the calls from GMRS. Went over with her the need to get her cell phone bills to evidence the calls. Answered questions from Melanie about the process.	450.00	0.8	360.00
Discovery	[GMRS 12/08/14] Researched, drafted, edited, and reviewed 26a disclosures. (1.6) Draft email to opposing counsel Schwartz regarding 26a disclosures and requesting the last 4-years of insurance policies. (.2)	450.00	1.8	810.00
Discovery	[GMRS 12/11/14] Revised initial Disclosures. (.6) Revised draft email to opposing counsel. (.3)	450.00	0.9	405.00
Discovery	[GMRS 12/13/14] Research to whether GMRS sent more than the 2014 insurance policy. Researched GMRS' naming former senators and case law research on whether GMRS can call ex-senators who drafted the TCPA to speak to its original intent. (2.3) Drafted and revised first set of interrogatories to GMRS. (3.3)	450.00	5.6	2,520.00
Discovery	[GMRS 12/14/14] Draft of Rule 30(b)(6) deposition notice. (2.1) Researched whether I should make an insurance claim on the building which might cover advertising injury. (1.8)	450.00	3.9	1,755.00
Discovery	[GMRS 12/15/14] Revised and edited draft Requests to Produce.(2.7) Editing and revising draft interrogatories (3.2)	450.00	5.9	2,655.00
Discovery	[GMRS 12/16/14] Edited Requests to Produce, Interrogatories, and Rule 30(b) Deposition.	450.00	1.8	810.00
Pleadings, Motions, or Other Writing	[GMRS 12/16/14] Reviewed and analyzed Court's Order denying the motion to dismiss. Checked back in with the original MTD against GMRS to see what the court denied in GMRS' motion to dismiss.	450.00	0.6	270.00
Discovery	[GMRS 12/18/14] Factual research related to any other issues to address in discovery. (1.6) Reviewed, edited, and proofed Requests to Produce, Interrogatories, and Deposition notice. (2.1)	450.00	3.7	1,665.00
Discovery	[GMRS 12/20/14] Final review of requests to produce, interrogatories, and deposition notice prior to service.	450.00	1.4	630.00
Discovery	[GMRS 12/21/14] Finalized and served discovery docs on Defendant.	450.00	0.8	360.00
Research	[GMRS 12/22/14] Reviewed and analyzed opposing counsel's email stating all documents in the case must be sent to his assistance and that a certificate of service is required for the	450.00	2.1	945.00

Task	Time Entry Notes	Rate	Hours	Line Total
	initial disclosures. (.4) Legal research regarding need to file or serve a certificate of service with initial disclosure served via email (.6) Review of case law regarding attorney's ability to ignore documents not served on a designee of attorney per the attorney's request. (1.1)			
Discovery	[GMRS 12/23/14] Mailed out interrogatories, RFPs, and Deposition notice.	450.00	0.2	90.00
Research	[GMRS 12/24/14] Reviewed CMC statement and case deadlines.	450.00	0.3	135.00
Research	[GMRS 12/26/14] Researched, organized, and drafted email to Schwartz regarding special email designation, exchanging discovery, issues in initial disclosures, and other discovery issues.	450.00	3.2	1,440.00
Discovery	[GMRS 12/29/14] Reviewed, printed, and mailed 26a1 disclosures for opposing counsel Schwartz.	450.00	0.3	135.00
Communication	[GMRS 01/05/15] Conference with Woodrow & Peluso regarding participating in GMRS case. Discussed facts of the case, case history, and where the case is heading.	450.00	1.2	540.00
Communication	[GMRS 01/07/15] Conference with Woodrow and Peluso regarding discovery	450.00	0.7	315.00
Discovery	[GMRS 01/08/15] Conference with Woodrow regarding discovery.	450.00	0.7	315.00
Discovery	[GMRS 01/09/15] Conference with Woodrow regarding insurance and whether there are other policies. (.6) Researched discovery issues. Drafted and edited letter to Schwartz regarding arranging a sit-down meeting and issues in their 26a1 disclosures. (1.5)	450.00	2.1	945.00
Communication	[GMRS 01/11/15] Conference with Woodrow regarding meeting opposing counsel in person and draft letter to that effect.	450.00	0.8	360.00
Communication	[GMRS 01/12/15] Communication with client Melanie Walsh regarding updates in the case. (.5) Finalize communication with opposing counsel Steven Schwartz regarding letter inviting him to set up a meeting and the 261 disclosures. (.9) Conference with Peluso and Woodrow regarding updates in the case. (.5)	450.00	1.9	855.00
Communication	[GMRS 01/14/15] Conference with Woodrow and Peluso regarding discovery and meeting upcoming deadlines (.6)	450.00	0.6	270.00
Pleadings, Motions, or Other Writing	[GMRS 01/21/15] Reviewed and analyzed GMRS' answer and affirmative defenses. Noted that GMRS admits to using an ATDS. Initial research into their affirmative defenses and structured initial research and plotted what issues need to be addressed.	450.00	3.3	1,485.00
Research	[GMRS 01/22/15] Researched affirmative defense related to whether political calls are not bound by TCPA since they are not	450.00	4.4	1,980.00

Task	Time Entry Notes	Rate	Hours	Line Total
	telemarketing calls. (1.3) Researched defense that publishing your telephone number to a voter registration board amounts to consent to be contacted by an autodialer. (1.2) Researched issues related to insurance coverage. Researched whether filing separate cases in different states can trigger then \$1 Million policy limits. (1.3) Conference with Peluso and Woodrow regarding insurance and their answers and defenses (.6)			
Research	[GMRS 01/23/15] Extensive case law research analyzing the premise that the TCPA is unconstitutional as applied to GMRS.	450.00	3.6	1,620.00
Pleadings, Motions, or Other Writing	[GMRS 01/24/15] Review and analyzed Defendant's Renewed Motion to Strike Improper Allegations of Plaintiff's Complaint and Incorporate Memorandum of Law. Researched parameters of a motion to strike and whether a response is required for this renewed motion.	450.00	2.5	1,125.00
Research	[GMRS 01/25/15] Researched issue regarding porting landline phone to cell phone and an autodialers duty to check for ported numbers. (1.7) Analyzed why GMRS is making a motion to strike 2 paragraphs of the complaint. Thought of legal ramifications in terms of willfulness and its implications on insurance. (1.4) Conference with Woodrow regarding strategy of opposing counsel to make the motion to strike and its possible impact on insurance (.7)	450.00	3.8	1,710.00
Pleadings, Motions, or Other Writing	[GMRS 01/26/15] Reviewed endorsed order docket text that Defendant's renewed motion to strike has been denied.	450.00	0.1	45.00
Discovery	[GMRS 02/01/15] Conference with Woodrow regarding defendant's discovery responses.	450.00	0.7	315.00
Pleadings, Motions, or Other Writing	[GMRS 02/02/15] Conference with Peluso and Woodrow regarding discovery letter.	450.00	0.6	270.00
Research	[GMRS 02/03/15] Case law research and strategy on insurance issues: Whether we can increase the cap for each person potentially. (1.6) Whether we can increase the cap by adding a plaintiff from 2013 in addition to our plaintiffs from 2014. Factual research to see if I can still be in contact with those who were called in 2013. (2.1) Whether we can increase the cap by filing different cases in different states with different class definitions, let's say for all calls made by 800-251-5850 to callers in San Francisco for the campaign between the months of August-September 2014 and another case with another class definition for all callers made from a particular campaign to people in New Hampshire from September - October 2014. For now, I want to assume that they were all political survey calls generated by the same company but probably conducted by local campaigns in each state so I'm assuming the campaigns are distinguishable but I'd like to find out what factors I need in order to distinguish	450.00	6	2,700.00

Task	Time Entry Notes	Rate	Hours	Line Total
	them. (1.7) Conference with Peluso and Woodrow regarding bringing clients in other states. (.6)			
Research	[GMRS 02/04/15] Updated Shelli T on the status of the case. (.7) Organized all other plaintiffs that we are ready to file in other jurisdictions. Updated co-counsel on signed retainers from other plaintiffs. (1.8)	450.00	2.5	1,125.00
Communication	[GMRS 02/04/15] Follow up with client Seth P regarding status of GMRS case.	450.00	0.8	360.00
Communication	[GMRS 02/04/15] Conference with Woodrow regarding discovery and bringing new cases in other states. Research on best states to bring new cases in. (1.1) Drafted email to opposing counsel Schwartz (.5)	450.00	1.6	720.00
Communication	[GMRS 02/05/15] Conference with Woodrow and Peluso regarding new clients and discovery.	450.00	0.4	180.00
Discovery	[GMRS 02/08/15] Marked up comments on Defendant's answers to interrogatories and what we will need with further discovery. Plotted possible discovery paths on how to get the information needed for the class.	450.00	3.1	1,395.00
Research	[GMRS 02/09/15] Communicated with co-counsel regarding discovery responses. (.7) Discussed issue of their MTD when they tried to claim that the FCC got it wrong on whether a non-profit can autodial cell phones. Research into Shamblin v Obama for America to show that the American Association of Political Consultants tried to file an amicus brief on the constitutionality of that case but the Judge denied hearing their amicus brief. (1.3) Researched public notice on Sept 11, 2012 warning political campaigns and promoters not to autodial cell phones. (.8) Researched Dept of Justice defended the TCPA in Edholm v Americans for Responsible Leadership. (1.2) Research showing Mountain West Research settled case for \$65/caller regarding polling and public opinion research calls. (.8)	450.00	4.8	2,160.00
Research	[GMRS 02/09/15] Further research on insurance issues related to cap of insurance. Explored new clients for different class periods to increase the amount for the class.	450.00	2.6	1,170.00
Research	[GMRS 02/09/15] Worked with Robert M to get his call logs. Went over retainer agreement with him. Culled through call logs of Robert M to find all calls received by GMRS. Prepared client for potentially filing the new case with him.	450.00	2.3	1,035.00
Communication	[GMRS 02/10/15] Communication with Woodrow regarding updates in discovery and insurance issues.	450.00	1.1	495.00
Communication	[GMRS 02/12/15] Communication with Woodrow and Peluso regarding discovery meet and confer. Also discussed Walsh's involvement in the case.	450.00	0.4	180.00

Task	Time Entry Notes	Rate	Hours	Line Total
Discovery	[GMRS 02/13/15] Reviewed and analyzed Old Dominion's insurance in light of the discovery responses.	450.00	2.4	1,080.00
Discovery	[GMRS 02/15/15] Continued review and analysis of insurance policies from 2012-2014.	450.00	2.3	1,035.00
Communication	[GMRS 02/16/15] Spoke with Robert M about the possibility of him participating in a deposition. Spoke to him about what a deposition entails. Worked on travel arrangements for him.	450.00	2.8	1,260.00
Research	[GMRS 02/16/15] Drafted email to co-counsel Woodrow regarding current GMRS case. Outlined two possible avenues for this litigation and triggering the insurance. (.6) Conference with Peluso and Woodrow regarding updates in the litigation. (.3)	450.00	0.9	405.00
Pleadings, Motions, or Other Writing	[GMRS 02/17/15] Reviewed and analyzed Woodrow's letter to opposing counsel outlining settlement structure outline.	450.00	1.3	585.00
Communication	[GMRS 02/18/15] Conference with Woodrow and Peluso regarding settlement letter.	450.00	0.2	90.00
Communication	[GMRS 02/23/15] Reviewed and analyzed Schwartz's email regarding settlement structure.	450.00	0.7	315.00
Research	[GMRS 02/24/15] Research Millward Brown docket and settlement, and drafted email to Woodrow and Peluso regarding the Millward Brown TCPA class action settlement involving autodialed political calls.	450.00	1.8	810.00
Communication	[GMRS 02/25/15] Reviewed and analyzed responses to Schwartz's email. (.8) Conference with Woodrow and Peluso regarding response. (.4)	450.00	1.2	540.00
Research	[GMRS 03/03/15] Reviewed and analyzed docket of Shamblin v Obama for America. Communicated with co-counsel Woodrow regarding its impact on our GMRS case.	450.00	2.7	1,215.00
Communication	[GMRS 03/06/15] Conference with Woodrow regarding settlement. (.3) Follow up email with Schwartz regarding settlement structure email. (.2)	450.00	0.5	225.00
Communication	[GMRS 03/08/15] Conference with Woodrow regarding discovery and settlement call.	450.00	0.2	90.00
Communication	[GMRS 03/10/15] Conference with Woodrow regarding communicating to Schwartz about claims rate insurance. Discussed with Woodrow on the best dates for a possible mediation.	450.00	0.2	90.00
Discovery	[GMRS 03/10/15] Analysis of discovery responses in preparation for conference call. (1.3) Conference call regarding settlement. (.9) Analyzed issues discussed in conference. (.6) Research into claims-made insurance (.8) Research into historical claims rate in class actions. (.6) Researched Millward Brown Inc case TCPA case for survey calls. Looked at structure of settlement and basis for case in docket. (2.3)	450.00	6.5	2,925.00

Task	Time Entry Notes	Rate	Hours	Line Total
Discovery	[GMRS 03/11/15] Conference with Peluso and Woodrow regarding filing in other states and going over the clients I have been in touch with. Discussed strategy heading to mediation.	450.00	1.2	540.00
Communication	[GMRS 03/13/15] Call with Woodrow regarding clients in other states.	450.00	0.3	135.00
Communication	[GMRS 03/18/15] Conference with Woodrow regarding outstanding discovery and settlement strategy.	450.00	0.2	90.00
Communication	[GMRS 03/23/15] Conference with Woodrow and Peluso regarding mediation strategy.	450.00	0.4	180.00
Communication	[GMRS 03/24/15] Communication with mediator's assistant to get dates for mediation. (.3) Conference with Woodrow regarding mediation strategy (1.0)	450.00	1.3	585.00
Pleadings, Motions, or Other Writing	[GMRS 04/01/15] Review and analysis of notice of mediation selecting Terry White, not the mediator we agreed on. (.3) Review and analysis of email with Schwartz regarding mediators (.9) Conference with Woodrow regarding Schwartz's notice with court that we selected Terry White when we already agreed with opposing counsel to use Rod Max. [.6] Conference with Peluso regarding pro hac (.3)	450.00	2.1	945.00
Communication	[GMRS 04/02/15] Conference with Woodrow and Peluso to discuss strategy for mediation.	450.00	1.1	495.00
Pleadings, Motions, or Other Writing	[GMRS 04/03/15] Review and edited draft mediation statement.	450.00	2.3	1,035.00
Pleadings, Motions, or Other Writing	[GMRS 04/05/15] Edited draft mediation statement.	450.00	0.7	315.00
Communication	[GMRS 04/06/15] Conference with Woodrow and Peluso regarding mediation strategy.	450.00	0.8	360.00
Pleadings, Motions, or Other Writing	[GMRS 04/07/15] Draft and edited pro hac vice motions. (.8) Conference with Woodrow regarding mediation (.4)	450.00	1.2	540.00
Pleadings, Motions, or Other Writing	[GMRS 04/08/15] Review of final draft of mediation statement. (1.2) Reviewed order denying pro hac vice motions. (.5) Researched issue of local rule 2.02 and the regular practice of law in Florida by non-barred lawyers. (.6) Conference with Peluso and Woodrow regarding pro hac vice applications. (.4) Edited previous pro hac vice motion to be refiled in accordance with local rules. (.4) Conference with Woodrow regarding mediation (.6)	450.00	3.7	1,665.00
Pleadings, Motions, or Other Writing	[GMRS 04/10/15] Reviewed order granting Steven Woodrow and Patrick Peluso to appear pro hac vice.	450.00	0.2	90.00
Communication	[GMRS 04/16/15] Conference with Woodrow and Peluso regarding settlement issues and strategies.	450.00	1.3	585.00

Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[GMRS 04/17/15] Communication with co-counsel Woodrow regarding update in the settlement process. We discussed the class size and the type and cost of notice.	450.00	0.7	315.00
Research	[GMRS 04/21/15] Reviewed and analyzed mediation statement in preparation for the mediation. Reviewed docket and discovery in preparation for the mediation. Outlined key points that need to be resolved in the mediation.. Prepared strategy to implement during the mediation and negotiations.	450.00	4.2	1,890.00
In-Person Appearances	[GMRS 04/22/15] Mediation: Travel to mediation (.9) Preparation for mediation. (2.1) Participating in full day mediation. (7.0) After the mediation, consolidated notes from the mediation and outlined the issues resolved and unresolved from the mediation. (1.4) Travel back from the mediation (1.2)	450.00	12.6	5,670.00
Research	[GMRS 04/23/15] Consolidated mediation notes and worked on term sheet. (1.6) Conference Peluso and Woodrow regarding mediation strategy. (.7)	450.00	2.3	1,035.00
Communication	[GMRS 04/26/15] Conference with Woodrow regarding insurance's impact on the settlement and whether we should seek out settlement insurance information to provide info for GMRS.	450.00	0.4	180.00
Communication	[GMRS 04/30/15] Conference with Woodrow regarding updates in the case and settlement.	450.00	0.4	180.00
Research	[GMRS 05/01/15] Obama for America denied class certification. Analysis and find out if our case is distinguishable.	450.00	2.4	1,080.00
Communication	[GMRS 05/01/15] Reviewed and analyzed Woodrow email regarding Obama for America case.	450.00	0.3	135.00
Communication	[GMRS 05/07/15] Conference with Woodrow and Peluso regarding updates in settlement discussions.	450.00	0.4	180.00
Communication	[GMRS 05/11/15] Conference with co-counsel regarding updates in settlement discussions and whether we should break off settlement discussions.	450.00	0.3	135.00
Communication	[GMRS 05/17/15] Conference with Woodrow regarding updates in the case.	450.00	0.2	90.00
Communication	[GMRS 05/22/15] Reviewed and analyzed communication between co-counsel Woodrow and Schwartz.	450.00	0.5	225.00
Communication	[GMRS 05/25/15] Conference with Woodrow and Peluso on amending the complaint and its implications in the case.	450.00	0.7	315.00
Communication	[GMRS 05/26/15] Reviewed mediator's report to court. (.1) Discussed with Woodrow and Peluso about filing other complaints in other states. (.5)	450.00	0.6	270.00
Communication	[GMRS 05/27/15] Phone call with Shelli T to discuss her involvement in the GMRS case. Discussed with her, her	450.00	1.3	585.00

Task	Time Entry Notes	Rate	Hours	Line Total
	availability to appear for a deposition if necessary and what a deposition entails.			
Communication	[GMRS 05/27/15] Client contact with Nicole Z. Went over the facts of her case to get her approval for the case to be filed in California.	450.00	0.5	225.00
Pleadings, Motions, or Other Writing	[GMRS 05/29/15] Organizing facts to be included in factual allegations for the Zilveti case. Drafting complaint for the California Zilveti case.	450.00	3.6	1,620.00
Communication	[GMRS 05/31/15] Updated Seth P on status of the case to see whether he would be willing to file another case in his home state against GMRS. (.6) Updated co-counsel on all plaintiffs and their states we could file in (1.3)	450.00	1.9	855.00
Pleadings, Motions, or Other Writing	[GMRS 05/31/15] Worked on California Zilveti case. Reviewed, analyzed, and edited draft. Went over the complaint with Nicole.	450.00	2.3	1,035.00
Communication	[GMRS 05/31/15] Updated Kristin A. on the status of the GMRS case and her involvement in the case.	450.00	0.8	360.00
Pleadings, Motions, or Other Writing	[GMRS 06/01/15] Conference with Woodrow and Peluso and Woodrow regarding new clients. (.3) Went over the facts to be included in the amended complaint with Kristen A. Verified all facts with Kristen A. Reviewed and edited draft of amended complaint. (2.3)	450.00	2.6	1,170.00
Discovery	[GMRS 06/02/15] Culled through recent call records Robert M provided. Requested phone bill with his name on them that also show how many minutes he pays for each month. Received cover pages for each of the bills	450.00	1.3	585.00
Communication	[GMRS 06/02/15] Incorporating rule 4.04 into the complaint. Client contact with Robert M regarding his phone bills.	450.00	1.3	585.00
Pleadings, Motions, or Other Writing	[GMRS 06/02/15] Reviewed order to show cause why Woodrow and Peluso not complying with the Court's order regarding electronic filing.	450.00	0.1	45.00
Pleadings, Motions, or Other Writing	[GMRS 06/04/15] Drafted, edited, and reviewed complaint to be filed in Pennsylvania.	450.00	3.6	1,620.00
Communication	[GMRS 06/04/15] Reviewed and analyzed communication between co-counsel Woodrow and Scwhartz.	450.00	0.3	135.00
Communication	[GMRS 06/04/15] Conferred with Peluso and reviewed Peluso's response to order to show cause.	450.00	0.3	135.00
Communication	[GMRS 06/05/15] Reviewed and analyzed Schwartz's communication to Woodrow.	450.00	0.4	180.00
Communication	[GMRS 06/07/15] Communication with co-counsel Woodrow regarding substituting two new plaintiffs for Walsh.	450.00	0.4	180.00
Research	[GMRS 06/07/15] Continued research and notes for Pennsylvania complaint with Alicia Thompson.	450.00	1.3	585.00

Task	Time Entry Notes	Rate	Hours	Line Total
Pleadings, Motions, or Other Writing	[GMRS 06/08/15] Drafting Pennsylvania complaint with Alicia Thompson.	450.00	2.7	1,215.00
Pleadings, Motions, or Other Writing	[GMRS 06/09/15] Drafted declaration in support of Plaintiff's motion for class certification. (.8) Communicated with co-counsel regarding class certification documents. (.4)	450.00	1.2	540.00
Research	[GMRS 06/09/15] Research into Pennsylvania class actions and how preliminary class certification motions are treated regarding attempted pick-offs.	450.00	1.9	855.00
Research	[GMRS 06/09/15] Case law research into which cases to cite for the Pennsylvania preliminary class cert motion.	450.00	2.4	1,080.00
Pleadings, Motions, or Other Writing	[GMRS 06/09/15] Edited and filed motion for leave to file first amended class action complaint and adding new Named Plaintiffs and John doe Defendants and Amending the Class Definition. (1.8) Edited and filed Plaintiff's Motion for Class Certification (2.3)	450.00	4.1	1,845.00
Pleadings, Motions, or Other Writing	[GMRS 06/10/15] Drafted preliminary class certification for Alicia Thompson Pennsylvania case.	450.00	4.1	1,845.00
Communication	[GMRS 06/11/15] Communication with Peluso regarding serving amended complaint and other updates in the case.	450.00	0.3	135.00
Pleadings, Motions, or Other Writing	[GMRS 06/13/15] Drafted and edited new version of Pennsylvania class certification motion.	450.00	1.3	585.00
Pleadings, Motions, or Other Writing	[GMRS 06/14/15] PA complaint and motion for class certification draft and review.	450.00	0.5	225.00
Communication	[GMRS 06/16/15] Conference with Peluso and Woodrow regarding motion to compel.	450.00	0.3	135.00
Communication	[GMRS 06/17/15] Reviewed complaint with Ali Thompson before filing it. Got her approval to file the case and confirmation on the facts.	450.00	0.8	360.00
Pleadings, Motions, or Other Writing	[GMRS 06/17/15] Worked on adding a table of contents and table of authorities for the PA class certification motion.	450.00	1.6	720.00
Communication	[GMRS 06/17/15] Conference with Woodrow regarding the filing of additional cases.	450.00	0.2	90.00
Communication	[GMRS 06/23/15] Communicated with Woodrow and Peluso regarding fees of Pennsylvania local counsel (.6) Conference with Woodrow regarding outstanding discovery issues and the motion to compel (.8)	450.00	1.4	630.00
Communication	[GMRS 06/24/15] Communicated With Ali Thompson to update her on the status of her case and to ask her more questions.	450.00	0.3	135.00
Pleadings, Motions, or Other Writing	[GMRS 06/25/15] Reviewed court's endorsed order granting motion to amend/correct complaint.	450.00	0.1	45.00
Pleadings, Motions, or Other Writing	[GMRS 07/13/15] Reviewed, analyzed, and edited Plaintiff's first motion to compel discovery responses.	450.00	3.8	1,710.00

Task	Time Entry Notes	Rate	Hours	Line Total
Pleadings, Motions, or Other Writing	[GMRS 07/14/15] Reviewed and analyzed the court's order denying the motion to certify the class without prejudice and the order striking the motion to compel for not complying with local rule 3.01(a).	450.00	0.5	225.00
Communication	[GMRS 07/14/15] Reviewed and analyzed the communication between Woodrow and Schwartz (.4) Conference with Woodrow regarding the court's order on the motion to compel. (.3)	450.00	0.7	315.00
Communication	[GMRS 07/15/15] Conference with Woodrow regarding striking of motion and how to resolve it.	450.00	0.7	315.00
Discovery	[GMRS 07/16/15] Reviewed subpoena to the Civitas Institute. (.3) Conference with Peluso regarding subpoena. (.2)	450.00	0.5	225.00
Communication	[GMRS 07/17/15] Reviewed communication between Woodrow and Schwartz.	450.00	0.2	90.00
Communication	[GMRS 07/19/15] Communication with client Kristin Armstrong and updating her about the case. (.5) Conference with Woodrow regarding client Armstrong. (.3)	450.00	0.8	360.00
Discovery	[GMRS 07/21/15] Reviewed Defendant's' privilege log to determine if it is sufficient to establish attorney-client privilege. (1.6) Conference with Woodrow and Peluso regarding privilege log and new client issues. (.5)	450.00	2.1	945.00
Communication	[GMRS 07/22/15] Communication with client Kristin Armstrong and updating her about the case.	450.00	0.4	180.00
Communication	[GMRS 07/27/15] Conference with Woodrow regarding mediation costs.	450.00	0.3	135.00
Pleadings, Motions, or Other Writing	[GMRS 07/28/15] Reviewed and analyzed Plaintiff's opposing GMRS Notice of Pendency of Other Actions.	450.00	0.8	360.00
Communication	[GMRS 07/29/15] Conference with Woodrow and Peluso regarding client Armstrong.	450.00	0.3	135.00
Research	[GMRS 07/31/15] Reviewed Defendant's Motion to Vacate In Part Order Granting Leave to Amend Complaint or for Reconsideration and for Sanctions with Memorandum. Research to see what issue of confidentiality were allegedly broken by Plaintiff's counsel. (2.6) Case law research regarding first to file principles and action-splitting. (3.1) Research into whether Schwartz has conferred regarding this motion for sanctions. (.5)	450.00	6.2	2,790.00
Pleadings, Motions, or Other Writing	[GMRS 08/02/15] Drafted, edited and reviewed letter responding to Defendant's Motion to Vacate and for Sanctions. Safe harbor letter against Schwartz.	450.00	2.7	1,215.00
Communication	[GMRS 08/03/15] Spoke with former client Walsh regarding update in the case. (.3) Spoke with Steve Woodrow regarding edits to letter and motion for sanctions. (.4) Spoke with Patrick Peluso separately regarding the motion and other edits. (.3)	450.00	0.7	315.00

Task	Time Entry Notes	Rate	Hours	Line Total
Pleadings, Motions, or Other Writing	[GMRS 08/03/15] Edited and reviewed latest draft letter to Schwartz regarding sanctions issue. (1.1) Reviewed, edited, and researched Plaintiff's Motion for Rule 11 Sanctions. (3.2)	450.00	4.3	1,935.00
Research	[GMRS 08/05/15] Research case deadlines and calendar. (.3) Conference with Woodrow regarding the deadline to add parties or amend the pleadings in the FL GMRS reasons. (.2)	450.00	0.5	225.00
Research	[GMRS 08/06/15] Review and analysis of communication from Schwartz regarding deposing Diana. Worked on issue of getting dates for depositions of plaintiffs in our cases. (1.1) Analyzed issue of Schwartz's proposal to give us national call data in return for dismissing CA and PA cases. Analyzed positive and negatives of dismissing current cases in PA and CA. (1.4)	450.00	2.5	1,125.00
Communication	[GMRS 08/10/15] Communication with Melanie Walsh regarding updates in the case.	450.00	0.7	315.00
Research	[GMRS 08/11/15] Discussion with Woodrow about DOJ in Zilveti case	450.00	0.2	90.00
Research	[GMRS 08/13/15] Case law research regarding the issue of discovery requests outside the bounds of the litigation regarding opposing counsel asking for medical records of client's father who we allege was sick in the complaint.	450.00	1.5	675.00
Pleadings, Motions, or Other Writing	[GMRS 08/14/15] Edited and reviewed latest draft response to sanctions and reconsideration.	450.00	1.4	630.00
Discovery	[GMRS 08/18/15] Reviewed and analyzed GMRS' RFP to Robert Martin and Kristin Armstrong, Interrogatories to Armstrong and Martin, and their amended responses to P's first request for production. (3.8) Conference with Woodrow and Peluso regarding GMRS discovery (.3)	450.00	4.1	1,845.00
Pleadings, Motions, or Other Writing	[GMRS 08/19/15] Review and analyzed Order denying Motion to Vacate.	450.00	0.2	90.00
Discovery	[GMRS 08/19/15] Reviewed Defendant's Amended Answers to Interrogatories and email from Woodrow to Schwartz regarding motion for sanctions.	450.00	2.2	990.00
Pleadings, Motions, or Other Writing	[GMRS 08/20/15] Review and analyzed unopposed motion to modify case management and scheduling order.	450.00	0.5	225.00
Pleadings, Motions, or Other Writing	[GMRS 08/21/15] Reviewed and analyzed Order granting in part motion to modify case management and scheduling order. Docketed all dates. Review and analyzed Defendant's verified motion for extension to serve answer to amended complaint.	450.00	1.2	540.00
Communication	[GMRS 08/21/15] Reviewed and analyzed communication and attachments regarding opposing counsel seeking leave to file answer to amended complaint.	450.00	0.8	360.00
Pleadings, Motions, or Other Writing	[GMRS 08/25/15] Review and edits of Rule 11 motion against GMRS and attorney Steven Schwartz.	450.00	2.6	1,170.00

Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[GMRS 08/26/15] Review and analyzed communication between Woodrow and Schwartz.	450.00	0.5	225.00
Pleadings, Motions, or Other Writing	[GMRS 08/28/15] Edited Plaintiffs' Second Motion to Overrule Defendant's Objection and To Compel Further Answers to Discovery.	450.00	3.6	1,620.00
Discovery	[GMRS 08/31/15] Reviewed Kristin Armstrong's responses to discovery. (.7) Reviewed and analyzed draft responses Robert Martin's answers to requests for production and interrogatories. (1.3)	450.00	2	900.00
Pleadings, Motions, or Other Writing	[GMRS 09/01/15] Reviewed and analyzed Defendant and Defense Counsel's Response to Plaintiffs' Motion for Rule 11 Sanctions.	450.00	0.8	360.00
Pleadings, Motions, or Other Writing	[GMRS 09/02/15] Review of Defendant's Second Amended Answers to Interrogatories.	450.00	1.2	540.00
Pleadings, Motions, or Other Writing	[GMRS 09/03/15] Final review and edits regarding Plaintiffs Second Motion to Overrule Defendant's Objection and to Compel Answer to Discovery	450.00	2.9	1,305.00
Discovery	[GMRS 09/10/15] Reviewed, edited, and analyzed Martin's draft discovery responses.	450.00	1.3	585.00
Pleadings, Motions, or Other Writing	[GMRS 09/11/15] Reviewed and analyzed order denying motion for sanctions.	450.00	0.4	180.00
Pleadings, Motions, or Other Writing	[GMRS 09/15/15] Reviewed and analyzed Defendant's Motion for a Protective Order and Objection to Plaintiff's Second Motion to Compel. Reviewed and analyzed Defendant's Request for Oral Argument. (2.6) Review of Robert Martin's final responses to interrogatories and requests for production. (1.2)	450.00	3.8	1,710.00
Pleadings, Motions, or Other Writing	[GMRS 09/16/15] Reviewed and edited motion for leave to file Reply brief in support of Second Motion to Compel.	450.00	1.6	720.00
Research	[GMRS 09/17/15] Review and analysis of Response in Opposition for oral argument.	450.00	1.8	810.00
Pleadings, Motions, or Other Writing	[GMRS 09/25/15] Reviewed and analyzed Plaintiffs' Reply Brief in Support of Second Motion to Compel Answers to Discovery.	450.00	2.3	1,035.00
Discovery	[GMRS 09/29/15] Reviewed and analyzed subpoena to Tampa Bay DSL d/b/a PBX-Change Inc.	450.00	0.2	90.00
Pleadings, Motions, or Other Writing	[GMRS 10/08/15] Reviewed and analyzed motion to re-set Oral Argument on Discovery Motions. Reviewed and analyzed Plaintiff's Response to Defendant's Motion for Reconsideration.	450.00	1.8	810.00
Pleadings, Motions, or Other Writing	[GMRS 10/09/15] Reviewed and analyzed order denying motion for reconsideration.	450.00	0.3	135.00
Research	[GMRS 10/13/15] Reviewed and analyzed email regarding settling on a class wide basis from GMRS' counsel. Conferred with co-counsel Woodrow strategy for settlement.	450.00	2.3	1,035.00

Task	Time Entry Notes	Rate	Hours	Line Total
Discovery	[GMRS 10/13/15] Reviewed and analyzed email from PBX Change regarding the data they have about the calls.	450.00	0.9	405.00
Communication	[GMRS 10/14/15] Conference with Woodrow and Peluso regarding settlement negotiation strategy. 1.7	450.00	1.7	765.00
Pleadings, Motions, or Other Writing	[GMRS 10/15/15] Review and analyzed Order on Second Motion to Compel. Communicating with co-counsel regarding impact of this order on the settlement.	450.00	2.3	1,035.00
Research	[GMRS 10/15/15] Communication with co-counsel regarding the Unites States of America in Support of the Constitutionality of the TCPA. Reviewed and analyzed their intervention memorandum.	450.00	3.2	1,440.00
Communication	[GMRS 10/15/15] Conference with Woodrow and Peluso for settlement strategy going into mediation. (.6) Separate conference with Woodrow regarding mediation issues. (.3)	450.00	0.9	405.00
Research	[GMRS 10/19/15] Reviewed and analyzed recent court filings and discovery issues in preparation for the mediation. Outlined issues to be decided on at mediation.	450.00	2.6	1,170.00
Communication	[GMRS 10/20/15] Participated by phone with Woodrow who appeared in-person at the 2nd mediation. (2.7) Research to find Florida First Financial v Superior Pharmacy in Circuit Court in Florida. (.8)	450.00	3.5	1,575.00
Research	[GMRS 10/26/15] Follow up research to find the case First Financial case and settlement doc. There was no blow up provision if the claims rate exceeded a certain amount, rather the provision was a blow up if enough people opted out of the system. Communication to co-counsel regarding First Financial case.	450.00	1.6	720.00
Pleadings, Motions, or Other Writing	[GMRS 10/26/15] Review and edited proposed term sheet, focused on insurer's contribution and claims rate clause.	450.00	2.7	1,215.00
Pleadings, Motions, or Other Writing	[GMRS 10/27/15] Reviewed and analyzed final proposed term sheet. (.5) Reviewed and analyzed unopposed motion to extend time to add parties after GMRS producing documents. (.8)	450.00	1.3	585.00
Communication	[GMRS 10/27/15] Reviewed and analyzed Order granting in part motion to extend time. Time to add parties is extended. Added dates into calendar. (.5)	450.00	1.7	765.00
Communication	[GMRS 10/28/15] Conference with Woodrow and Peluso regarding settlement.	450.00	1.2	540.00
Communication	[GMRS 10/29/15] Communication with co-counsel regarding current status of settlement negotiations and whether we should terminate negotiations because of opposing counsel's changes.	450.00	0.6	270.00
Settlement	[GMRS 11/02/15] Reviewed and analyzed proposals to present to Jeff Blaker and mediator Rod Max.	450.00	0.7	315.00

Task	Time Entry Notes	Rate	Hours	Line Total
Communication	[GMRS 11/11/15] Conference with Woodrow and Peluso regarding settlement terms.	450.00	0.4	180.00
Settlement	[GMRS 11/11/15] Research and analysis regarding settlement proposal regarding class size, overall claim amount, capital insurer's cap, and how claims will be processed in 2010-2011. Research into typical claims rate to come to an out of pocket cost to Defendant. Priced out direct notice.	450.00	3.2	1,440.00
Communication	[GMRS 11/12/15] Conference with Woodrow and Peluso regarding settlement proposal and how to respond.	450.00	1.5	675.00
Communication	[GMRS 11/13/15] Communication with Woodrow regarding counter-offer.	450.00	0.6	270.00
Settlement	[GMRS 11/17/15] Continued draft and edits of settlement agreement (2.2). Reviewed and analyzed relief to class members. (.8) Researched legality of text messages as a notice function. (1.2)	450.00	4.2	1,890.00
Communication	[GMRS 11/18/15] Conference with Woodrow and Peluso regarding claim amounts for class members. (1.4) Research into publication notice given GMRS' data. (1.3) Analyzed best per claim amount given their available funds and insurance. (.8)	450.00	3.5	1,575.00
Settlement	[GMRS 11/19/15] Research on getting bids from KCC and GCC from admin costs.	450.00	0.7	315.00
Communication	[GMRS 11/20/15] Conference with Woodrow regarding settlement administrators.	450.00	0.4	180.00
Settlement	[GMRS 11/23/15] Communication with co-counsel Woodrow regarding getting quotes for class administrators. (.7) Legal research regarding plaintiff contributing to notice costs. (1.2) Review and edits of draft of settlement agreement. (1.6)	450.00	3.5	1,575.00
Settlement	[GMRS 11/24/15] Worked on further negotiating settlement. (1.6). Research on due process requirements for class action notice to class members. (1.3)	450.00	2.9	1,305.00
Settlement	[GMRS 12/02/15] Reviewed, analyzed, and edited third draft settlement agreement.	450.00	2.6	1,170.00
Settlement	[GMRS 12/03/15] Reviewed and analyzed defense counsels draft of settlement agreement.	450.00	1.3	585.00
Communication	[GMRS 12/06/15] Reviewed and analyzed Woodrow's email to opposing counsel.	450.00	0.3	135.00
Settlement	[GMRS 12/06/15] Reviewed and edited notice documents short and long form and the claim form. (2.5)Reviewed KCC's cost breakdown for class action administration. (.9)	450.00	3.4	1,530.00
Settlement	[GMRS 12/07/15] Reviewed and analyzed edits of opposing counsel. Outlined outstanding issues. (1.3) Conference with Woodrow and Peluso regarding edits to the settlement agreement by opposing counsel. (.8)	450.00	2.1	945.00

Task	Time Entry Notes	Rate	Hours	Line Total
Pleadings, Motions, or Other Writing	[GMRS 12/17/15] Review and analyzed unopposed motion for extension of time to February, 2016.	450.00	0.5	225.00
Pleadings, Motions, or Other Writing	[GMRS 12/18/15] Reviewed and analyzed Order denying motion for extension of time to amend and that Defendant shall respond to Plaintiff's Motion for Class Certification. (.5) Conference with Peluso and Woodrow regarding seeking additional time (.9)	450.00	1.4	630.00
Pleadings, Motions, or Other Writing	[GMRS 12/19/15] Discussed motion for reconsideration. Reviewed and analyzed Rod Max's declaration in Support of Joint Motion to Reconsider.	450.00	0.5	225.00
Communication	[GMRS 12/21/15] Conference with Woodrow regarding mediation expenses and the Zilveti case.	450.00	0.4	180.00
Pleadings, Motions, or Other Writing	[GMRS 12/23/15] Reviewed, analyzed, and edited Joint Motion for Reconsideration.	450.00	2.3	1,035.00
Pleadings, Motions, or Other Writing	[GMRS 12/28/15] Review of Court's Order granting Motion for Reconsideration.	450.00	0.5	225.00
Communication	[GMRS 12/29/15] Conference with Peluso and Woodrow regarding further settlement negotiations.	450.00	0.5	225.00
Settlement	[GMRS 12/30/15] Reviewed, analyzed, and edited settlement agreement. (2.5) Reviewed, analyzed, and edited proof for claims forms (1.2) Conference with Woodrow and Peluso regarding edits to settlement agreement (.7)	450.00	4.4	1,980.00
Settlement	[GMRS 12/31/15] Reviewed updated draft of settlement agreement and settlement docs. (2.3) Researched what could happen if GMRS files for bankruptcy after settlement. (1.6)	450.00	3.4	1,530.00
Communication	[GMRS 01/06/16] Discussion with co-counsel regarding whether to leave the attorney's fee issue to the court.	450.00	0.4	180.00
Communication	[GMRS 01/10/16] Communicated with Woodrow regarding new insurance coverage from Mapfre.	450.00	0.8	360.00
Research	[GMRS 01/14/16] Reviewed and analyzed email from Schwartz to Mapfre inviting them to participate in a new mediation. (.4) Research into Mapfre's involvement in prior TCPA litigation and class action settlements. (1.3)	450.00	1.7	765.00
Settlement	[GMRS 01/20/16] Reviewed and analyzed latest draft of settlement agreement to account for Mapre and transfer of PA and CA actions.	450.00	1.3	585.00
Research	[GMRS 01/31/16] Conference with Peluso and Woodrow regarding Mapfre's denial of coverage and how to proceed. (1.1) Legal research whether an insurance company can renege on their representation once engaged in defending the lawsuit. (.8) Also factual investigation whether Mapfre has formally denied coverage or just made a reservation of rights. (.9)	450.00	2.8	1,260.00
Communication	[GMRS 02/01/16] Conference with Peluso regarding research on Mapre's insurance coverage.	450.00	1.1	495.00

Task	Time Entry Notes	Rate	Hours	Line Total
Settlement	[GMRS 02/02/16] Prepared for full day mediation. Review of docket and current terms of an apparent settlement. (2.1) Research and analysis on how Mapfre can add value to the class. Analysis to figure out how to incentivize them to take part in the settlement as a paying party. (1.9) Review of their denial of coverage letter. (1.3)	450.00	5.3	2,385.00
Settlement	[GMRS 02/03/16] Prepared for and participated in all-day third mediation with GMRS. (7.0) Consolidated all my notes from the mediation into an internal summary. Research and analysis to resolve final issues. (.8)	450.00	7.8	3,510.00
Communication	[GMRS 02/04/16] Conference regarding new phase of negotiations with Peluso and Woodrow.	450.00	0.4	180.00
Settlement	[GMRS 02/06/16] Reviewed and analyzed Schwartz's latest edits of the settlement agreement, including their reservation of right of GMRS to pursue Mapre. Research on whether GMRS or Diana has a good faith basis to pursue an action against Mapfre. Researched whether the class members could pursue a claim against Mapfre. Reviewed and analyzed edits of short and long term notices.	450.00	2.6	1,170.00
Settlement	[GMRS 02/08/16] Further reviewed, analyzed, and edited settlement agreement. (1.8) Further reviewed, analyzed, and edited long form and short form notices. (.9) Conference with Woodrow and Peluso regarding negotiations (.5)	450.00	3.2	1,440.00
Settlement	[GMRS 02/20/16] Review and analysis of communication with Schwartz regarding fees and whether the settlement is complete and also whether the mediator's rule of 'nothing is agreed to until everything is agreed to.' Outlined strategy regarding fees going forward.	450.00	1.3	585.00
Communication	[GMRS 02/25/16] Conference with Woodrow regarding outstanding settlement issues to be resolved.	450.00	0.7	315.00
Settlement	[GMRS 02/29/16] Review and edited letter to opposing counsel regarding negotiating fees. (.8) Conference with Woodrow and Peluso regarding settlement of fees. (.5)	450.00	1.3	585.00
Settlement	[GMRS 03/03/16] Review and edits of newest version of the settlement agreement.	450.00	2.3	1,035.00
Research	[GMRS 03/08/16] Communication with Woodrow regarding negotiating attorney's fees. Reviewed and analyzed Judge Presnell's decisions regarding attorney's fees.	450.00	2.7	1,215.00
Settlement	[GMRS 03/09/16] Research to locate an expert to attest to hourly rate fees for our fee petition in Florida.	450.00	0.8	360.00
Settlement	[GMRS 03/12/16] Reviewed and analyzed latest version of short form and long form notices and Woodrow's edits. (.8) Reviewed and edited latest version of the settlement agreement. (1.4)	450.00	2.2	990.00

Task	Time Entry Notes	Rate	Hours	Line Total
Pleadings, Motions, or Other Writing	[GMRS 03/15/16] Reviewed, analyzed, and commented on motion for preliminary approval. (1.3) Researched what GMRS admitted or didn't admit to in court paper filed regarding their using an autodialer (.5) Research regarding other non-telemarketing TCPA settlement payouts to cite in preliminary approval motion (1.4)	450.00	3.2	1,440.00
Settlement	[GMRS 03/16/16] Analyzed, Edited, and Reviewed updated settlement agreement.	450.00	0.6	270.00
Research	[GMRS 03/17/16] Communication with S. Woodrow regarding contested fee petition. Case law research on fee related discovery in the 11th circuit.	450.00	1.3	585.00
Settlement	[GMRS 03/17/16] Final review and signing of settlement agreement.	450.00	0.7	315.00
Pleadings, Motions, or Other Writing	[GMRS 03/29/16] Review and analysis of Preliminary approval order and calendared dates.	450.00	0.3	135.00
Pleadings, Motions, or Other Writing	[GMRS 04/05/16] Review and analysis of motion to enlarge opt out/objection deadline.	450.00	0.4	180.00
Pleadings, Motions, or Other Writing	[GMRS 06/27/16] Reviewed, analyzed, and edited motion for attorney's fees.	450.00	3.8	1,710.00
Pleadings, Motions, or Other Writing	[GMRS 06/28/16] Continued analysis and edits of Motion for Attorney's Fees.	450.00	1.6	720.00
Pleadings, Motions, or Other Writing	[GMRS 06/29/16] Drafted declaration in support of motion for attorney's fees.	450.00	0.9	405.00
Pleadings, Motions, or Other Writing	[GMRS 06/29/16] Reviewed, analyzed, and edited draft declaration in support of motion for attorneys' fees. Reviewed and edited law firm resume.	450.00	0.7	315.00
Pleadings, Motions, or Other Writing	[GMRS 06/29/16] Analyzed and edited Plaintiff's Motion for Attorney's Fees.	450.00	1.7	765.00

Item	Description	Unit Cost	Quantity	Line Total
Expense	[GMRS 03/24/16] Professional Services, UPCHURCH WATSON WHITE & MAX: Mediation's Fee Invoice #4	6,468.75	1	6,468.75
Expense	[GMRS 01/04/16] Professional Services, UPCHURCH WATSON WHITE & MAX: Mediation Fee Invoice #3	4,240.62	1	4,240.62
Expense	[GMRS 10/22/15] Legal Fees, UPCHURCH WATSON WHITE & MAX: Mediation fee Invoice #2	6,290.87	1	6,290.87
Expense	[GMRS 05/27/15] Professional Services, UPCHURCH WATSON WHITE & MAX: Mediation Fee Invoice #1	5,606.25	1	5,606.25
Expense	[GMRS 08/13/14] Professional Services, World Class Investigations, Inc.: Service on GMRS and Diana	110.00	1	110.00
Expense	[GMRS 08/11/14] Legal Fees, Court: Filing fee	400.00	1	400.00

Total	334,831.49
Amount Paid	0.00
Balance Due (USD)	\$334,831.49

PAYMENT STUB

Law Offices of Stefan Coleman
201 S Biscayne Blvd, 28th Floor
Miami FL 33131

Client	Law Offices of Stefan Coleman
Invoice #	0001270
Invoice Date	June 29, 2016
Balance Due (USD)	\$334,831.49
Amount Enclosed	
